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MEMORANDUM

TO: Members of the Tallahassee-Leon County Local Planning Agency

FROM: Vivian Young, AICP, Special Projects Director

DATE: March 28, 2025

RE: Comments for April 1, 2025, LPA Transmitting Public Hearing on Draft Update

Thank you for the opportunity to provide input on the draft update to the Land Use and Mobility Element of the Tallahassee-Leon County Comprehensive Plan.

As you are aware, a community's comprehensive plan is the legal document that codifies community vision on where and how our community will develop over a specified timeframe. We would like to start by saying that we strongly support the overarching goal of keeping urban lands urban and rural lands rural. If carefully crafted, this can be a strong foundation for protecting sensitive natural lands, limiting sprawl, creating more vibrant urban areas, and limiting the cost to taxpayers for costly infrastructure expansion into rural areas.

We wish to make several recommendations regarding the update. As an aside, our recommendations below were based on the documents released in mid-March. Considerable additional documents and policy changes were released with the March 26 LPA agenda. Due to time constraints, we have only undertaken a cursory review of these additional documents which include a plethora of information.

- 1. Timeline – We continue to believe that the comprehensive planning update process is rushed and urge you to recommend that the City and County pause the process, address identified community concerns, conduct one or two citizen workshops to discuss the updates with the public, and postpone the transmittal process until at least the fall to allow time for a more robust review by all involved.**

While we understand that the comprehensive plan update process has been under way since 2015 with reports, surveys, and public meetings subsequently undertaken, it was not until January 2025 that the roll out of goals and objectives began, followed by a draft and very general Future

Land Use Map (FLUM), and finally policies and a detailed FLUM in mid-March. Hundreds of pages of new information were released with the March 26 LPA agenda, including new provisions in the previously released updated goals, objectives, and policies, a 90-page addendum of additional policies that are up for adoption, a 155-page document outlining changes, and more. This chronology is shown in [Attachment 2](#) of the agenda packet.

The result is that citizens and members of the LPA have only been able to review all the documents in their entirety since March 26, less than a week before the April 1 LPA Transmittal Hearing.

Why the rush? This process began almost a decade ago, and while a number of public meetings were held to gather public input at the front end, only minimum legal requirements are now being met to review the proposed updates, even as new information continues to be released. We urge the LPA and the Tallahassee and Leon County Commissions to meet not just the minimum statutory requirements but also the intent of robust citizen participation in the planning process.

1. **Comparison Review – On March 26, the 155-page [Future Land Use Crosswalk](#) was released which identifies the differences between current goals, objectives and policies, and those proposed. With a week until the meeting, there is insufficient time to review all of the changes to gain a clear understanding of the implications. This provides further justification for the need to pause the process.**

As but one example, with regard to expansion of the currently adopted Urban Services Area (USA), the existing plan Objective 1.1 [L] notes:

“The location and size of the USA shall be depicted on the Future Land Use Map and is based upon the area necessary to accommodate 90% of new residential dwelling units within the County by the Plan Horizon; the ability to provide urban infrastructure; and, the presence of environmentally sensitive lands and water bodies, requiring protection from the impacts of urban development.”

There are several objectives and policies related to the USA in the proposed plan, but none seem to address that the USA is intended to accommodate 90% of new residential dwelling units within the County. This appears to be a substantive change that merits informed evaluation by members of the community. We expect there are numerous other examples.

The following recommendations relate to statutory requirements related to the comprehensive plan update process:

- 2. Measurable Objectives – [163.3164 \(36\), F.S.](#) related to the Community Planning Act includes this definition: “Objective’ means a specific, measurable, intermediate end that is achievable and marks progress toward a goal.” There are numerous objectives in the update that are neither specific nor measurable and need refinement.**

The need for measurability is further reinforced in the Tallahassee-Leon County Planning Department report [2016], [Vibrant Tomorrow: State of the Land Use Element](#), which is included under the data and analysis drop down on the update webpage. On page 9, it discusses the lack of measurable objectives in the current plan, and includes the following example:

Current Plan, Immeasurable: *Land Use Element Objective 3.2 – Provide for the convenient, aesthetically pleasing and compatible location of office uses to provide business and professional services and employment opportunities that are easily accessible through planning integration into the existing transportation network.*

Vibrant Tomorrow goes on to note: “The above objective is vague regarding how the provision of convenient, aesthetically pleasing and compatible location of office uses should be achieved, resulting in an immeasurable objective. No specific area of Tallahassee or Leon County is referenced, nor is “convenient” defined. **Overall, the above objective does not provide any direction or measurable provisions to achieve its purpose or mark progress towards a goal.**” [emphasis added]

Proposed Update, Immeasurable:

Below are a series of a few examples of immeasurable objectives in the proposed plan. In most cases, these are worded in the form of goals and not objectives, all include general adjectives and are not specific, and none are measurable.

Objective 1.2 – Preservation of Natural Areas: *Preserve natural areas, including conservation areas, environmentally sensitive features, and water resources. Prioritize and maximize the protection of these areas when making decisions regarding land use, transportation, and infrastructure extension.*

Objective 2.1 – Growth and Population Accommodation. *Tallahassee and Leon County will accommodate our population growth in a responsible manner. A growth and development strategy that provides for well-managed, orderly growth that preserves natural resources and promotes fiscal responsibility shall be leveraged to maximize economic and environmental stewardship while accommodating the increased population.*

Objective 3.1 – Residential Character: *Provide for connectivity and a balanced mix of residential uses that allow for greater housing diversity while protecting the character of existing, viable residential areas and neighborhoods.*

Objective 4.1 – Missing Middle Housing: *Ensure diverse housing options along a spectrum of affordability and housing types in residential areas to support walkable neighborhood commercial uses, and public transportation options. Allow for diverse housing options in new and existing neighborhoods to ensure that the housing types are not homogeneous and provide a solution to the mismatch between the available housing stock, shifting demographics, and a growing demand for walkability.*

Objective 5.1 – Economic Health: *Initiate community planning, urban development, and redevelopment strategies that prepare business, production facilities, trades, and related activities that provide the livelihoods of the population to withstand positive and negative changes in the economy and continue providing jobs and incomes to support the community.*

Objective 6.1 – Land Use and Transportation Coordination for Livability: **Coordinate** land use and transportation **systems** that **foster vibrant** communities with compact urban forms and a mixture of uses to **minimize** travel distances, **reduce** greenhouse gas emissions, and **enhance** pedestrian, bicycle, and transit mobility.

3. **Data and Analysis – 163.3177(1)(f), F.S. requires that all elements of the comprehensive plan and plan amendments “shall be based upon relevant and appropriate data and an analysis by the local government.... To be based on data means to react to it in an appropriate way and to the extent necessary indicated by the data available on that particular subject at the time of adoption of the plan or plan amendment at issue.” This information appears to be missing on key topics.**

The **data and analysis drop down menu** includes hundreds of pages of information but there does not appear to be accompanying analysis of what information within each of those studies informed the creation of the update.

- As one example, in a March 19 interview with Matt Hoffman of WCTV, staff indicated that the community requires 23,000 new housing units by 2050. As of March 26, while the data includes the required population projections by BEBR, there does not seem to be detailed population accommodation projections identify the basis for 23,000 units and whether and how the plan meets this need. This could be supported by the following data: How many units are currently available in the USA area and the non-USA area?
- How many units are currently approved but not yet completed, (for example, in Welaunee), and how are these included in the calculations?
- How many units would be available in each area if current zoning reached build out, and what year is build-out anticipated based on BEBR projections?
- How many units will be available in each area with just the updates to the FLUM?
- How many units will be available if the new FLUM is adopted, and zoning is updated to be consistent with the FLUM?

In a related area, the 2023 Live Local Act made considerable mandatory changes to allowable heights, densities, and more in all communities in the state. Tallahassee

has prepared the [Live Local Height Tool](#) to analyze the impacts of this act on development patterns in the City. However, it is our understanding that this data was not used in the preparation of the FLUM because it was not required. It would be helpful to incorporate this data.

4. **Internal Consistency – [163.3177\(2\), F.S.](#) notes: “Coordination of the several elements of the local comprehensive plan shall be a major objective of the planning process. The several elements of the comprehensive plan shall be consistent.”** Among other things, this means that the goals, objectives, and policies included in this element must be consistent with provisions in the other adopted elements. This also relates to the issue of timeline, as careful review of consistency between the elements is not feasible with such a short timeframe.

The final series of recommendations relate to keeping urban areas urban, as identified as the overarching goal of the plan:

5. **Keeping Urban Areas Urban – Again, 1000 Friends strongly supports this concept. But we feel that further steps could be undertaken as part of the update.**

Planning Period – It is within the authority of the city and county to have the plan address the 2050 planning horizon but include provisions to address development demand over a ten-year time frame instead of by 2050. This allows “phasing” development allowances as conditions change over the coming decades. While the planning horizon of 2050 is reasonable, we urge you to shorten the development capacity timeframe to 10 years to allow for needed development but provide the opportunity to refine the plan for future changing conditions.

Authority to have two timeframes is included in [163.3177\(5\)\(a\), F.S.](#), which states: “Each local government comprehensive plan must include at least two planning periods, one covering at least the first 10-year period occurring after the plan’s adoption and one covering at least a 20-year period. Additional planning periods for specific components, elements, land use amendments, or projects shall be permissible and accepted as part of the planning process.”

The authority to address development capacity over a shorter time frame is included in [163.3177\(1\)\(f\)3, F.S.](#) which further states: “The plan must be based on at least the minimum amount of land required to accommodate the medium projections as published by the Office of Economic and Demographic Research for at least a 10-year planning period....”

Concentration of Urban Development – While directing development to within the USA is appropriate, a more refined approach is needed to determine where in the USA more intensive development is most appropriate.

The broadbrush approach taken would set the stage for the upzoning of large areas within the USA, without consideration of other planning factors. For example, Objective 2.6 – Recognizable Places, calls for redevelopment with higher density and intensity land uses along several corridors, and Policies 4.2.2 and 4.2.3 on Transit Oriented Development (TOD) outline density incentives to promote walkability and transit. Instead of intensifying allowable future land uses in large areas, it would make more sense to identify appropriate corridors for greater density, craft desired incentives, and update the FLUM to support intensified development in those areas while leaving other areas for less intensive development. This also is a more fiscally responsible approach and will not require even greater economic incentives to compensate for areas that may have been inappropriately densified in this update.

Making Urban Areas More Livable – Vibrant urban areas are walkable and bikeable, support transit, and include a mixture of residences, offices, and commercial uses in close proximity. Having separated pockets of more urbanized development can be counterproductive.

A concern with the approach of having large areas approved for more intensive development is that instead of creating concentrated and cohesive urban area(s), it will create scattered pockets of denser development that may not support TOD or greater urban design goals.

Density Increases – We understand and support the need for increased density in urban areas based on need and the appropriateness of location. However, in the interest of transparency, we believe there should be clearer messaging on this issue as this document is intended to reflect the community vision.

In response to citizen concerns about density increases, the routine response (as seen in [Attachment 7, Public Comment](#)) is that this update focuses on changes to future land use, and does not involve zoning changes that would be needed to increase density. While this is technically correct, it appears disingenuous.

What is not mentioned is that if the FLUM and policies are updated, it establishes the legal foundation needed to make zoning changes to reflect the “community vision” that increased density is appropriate in certain areas. For example, as shown in the LPA [Attachment 6, Land Use Comparison](#), the proposed Urban Residential Preservation category doubles allowable density from “6 units per acre” to “12 units per acre 5,000 sq ft per acre.”

Based on these comments, we urge you to slow the process down to address technical issues, reexamine the urban policies, and provide more opportunity for citizen input through workshops and other means.

With thanks,

A handwritten signature in black ink that reads "Vivian Young". The signature is written in a cursive, flowing style.

Vivian Young, AICP
Special Projects Director