Dear Mr. White,

The League of Women Voters of Tallahassee (League or LWVT) now has decades of experience supporting responsible growth management, resource stewardship, and long-range planning consistent with the public policy positions of LWV Florida and national LWVUS. Being engaged in the Land Use and Mobility Elements update of the TLCPD Comprehensive Plan has allowed us to continue this legacy.

League members participated in the public outreach efforts to date that include open houses, public meetings, on-line surveys, and ‘deep-dive’ workshops. We appreciate the February 6, 2019 presentation you made to our Local Government Study and Action Group, individual meetings, and the July 18, 2018 Public Participation Workshop that LWVT organized with your Planning and Growth Management colleagues. Promoting public understanding and participation in decision making are core policies of the League, at all levels, and we stand ready to continue collaborative efforts.

Thank you for your time and consideration of the enclosed comments and recommendations presented by the LWVT Local Government and Climate Change & Sustainability Study and Action Groups. Please contact Beth Hollister (850-524-2139 or bethholl@yahoo.com) if you have any questions.

Sincerely,

Teri Cleeland, President
League of Women Voters of Tallahassee

Enclosure

cc: Cherie Bryant, Planning Manager, TLCPD
Wayne Tedder, Assistant City Manager, COT Development Services & Economic Vitality
Danielle Irwin, Chair, LWVT Local Government Study and Action Group
Linda Lee, Chair, LWVT Climate Change and Sustainability Study and Action Group
Beth Hollister, Member, LWVT Local Government Study and Action Group
Richard G. RuBino, Member, LWVT Local Government Study and Action Group, and Professor Emeritus of Urban & Regional Planning at Florida State University
Comments on the Comprehensive Plan - Land Use and Mobility Elements Update

1. Preamble
The population of Leon County is projected to grow from the 2018 estimate of 292,332 to nearly 350,000 by 2045. Also by 2045, the City of Tallahassee is estimated to have a population density higher than today but still lower than the current population densities of many vibrant and sustainable cities across the nation (Figure 1).

![Graph showing population per square mile for select US cities in 2018 and Tallahassee 2045]

Figure 1. Population per Square Mile, Select US Cities in 2018 and TALLAHASSEE 2045

The population density of larger cities is off the chart: Miami and Amsterdam are already five times as dense as what Tallahassee is projected to be in 2045 at around 13,000 persons/square mile. Naturally, other cities like New York are even denser at 27,752 persons/square mile.

Chapter 163, Florida Statutes (F.S.), provides good development and growth policies that support reduction in vehicular travel and lower carbon footprints, more resilient and vibrant developments, conservation of water and energy, walkable and bike-friendly healthy communities, and judicious use of tax dollars expended for public facilities and infrastructure. These sustainable practices are also fundamental to Traditional Neighborhood Developments (TNDs), Sustainable Communities, and in New Urbanism, and include, for example:

- Addressing outdated development patterns, such as antiquated subdivisions

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1 University of Florida, Bureau of Economic and Business Research (BEBR), [https://www.bebr.ufl.edu/population](https://www.bebr.ufl.edu/population).
3 “The transportation sector generates the largest share of greenhouse gas emissions ... from burning fossil fuel for our cars, trucks, ships, trains, ...” [https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions](https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions).
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- Compact urban forms
- Discouraging urban sprawl
- Fiscally strong urban centers
- Housing diversity for all current and anticipated future residents
- Mixed-use developments
- Multimodal transportation system and multimodal transportation districts (MMTDs)
- Revitalization, redevelopment, and renewal of blighted areas
- Urban infill
- Walkable and connected communities

Recommendation 1. Ensure strategies that support sustainable practices are prominently included. Note that design standards, form-based land development regulations, and broad-based public consultations would likely be necessary for successful implementation.

2. Process
Coordination and consistency of the several elements of the Plan are required by statute (s. 163.3177(2), F.S.) and are meant to be a major objective of the planning process. Also, continuation of public participation is important to implement Recommendation 1.

Recommendation 2.1. Because other major elements of the Comp Plan are already touched upon in current draft goals and objectives, all elements can be reviewed and updated before finalizing the Land Use and Mobility element. Accordingly, the Future Land Use Map (FLUM), related map series, and any major policies or ordinances affecting land use and transportation would not be revised until satisfactory completion of the update process. This will also afford an opportunity to simplify the Plan and avoid duplicative and potentially conflicting goals, objectives, and policies.

Recommendation 2.2. Continue and enhance public outreach and public participation. Ensure that any consultant inputs are regularly shared with the public and equally balanced with a continuation of public consultations. Endeavor to tailor presentation content appropriately to diverse audiences representative of all Leon County residents and interest groups and streamline presentations to maximize meaningful public input and exchange of views.

3. The Future and Beyond
Tallahassee and Leon County are already facing challenges that are likely to continue for the foreseeable future. American society is aging, health indicators are in decline, poverty and homelessness persists; and the spotlight of criminal activity continues to glare on our capital city.

Florida's capital is already an urban oasis and magnet of prosperity in a sea of rural underserved areas. The Northwest Rural Area of Opportunity (RAO)\(^4\) rims Leon County to the west and south, the North Central RAO book-ends Leon to the east and southeast, and rural counties and small towns blanket northern areas across state lines.

Florida is already experiencing the impacts of climate change with sea level rise, extreme weather events, and inordinate flooding. Leon County's resilient shelters and Seven Hills already provide

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refuge for thousands during major storm events. Over time, Leon County may become a more frequent destination for temporary or permanent climate migrants and refugees.

Our built environment and American lifestyle resonate around the globe. They are not proactively exported but through globalization aspired to and copied in developing and newly industrializing countries (NICs) worldwide.5

Innovation and technology can be key tools on the path to a more sustainable future. Artificial intelligence (AI) and the “internet of things” are already bringing us driverless cars and “geo-fenced” scooters. Meanwhile, these tools can put both blue-collar and knowledge workers jobs at risk.6

**Recommendation 3.** Consider the role of land use and mobility in better responding to an aging society, in human health and safety of our communities, and in socio-economic challenges. Keep the future in mind and think regionally and globally. During coordination with adjacent counties, consider policies that could help balance access to prosperity and opportunity and potentially reduce the pull into Leon County. Consider how important our built environment and preserving natural systems can be in setting good (or bad) examples, near and far; and how it can promote economic diversity and adaptation to future threats and uncertainties. Borrow from good practices where applicable, e.g., the Broward County Comp Plan Climate Change Element.7

4. Monitoring

Data and analyses are important to monitor, evaluate, and appraise implementation of the Plan. Community goals and vision, and surveys and studies, are all valid data (s. 163.3177(1)(f), F.S.). Understand that changes in legal frameworks over time may skew data and resulting analyses with unintended and perhaps misleading results. Also, not everything that is important is measurable, and much that is measurable is unimportant.8

**Recommendation 4.1.** Data and analyses should focus on developing current and meaningful metrics as a complement to professional judgement for useful future appraisals. Consider to what purpose will measurements be put, and to what desired outcome or results.

**Recommendation 4.2.** The overriding standard of success should be a healthy Quality of Life. This applies to all permanent and seasonal residents, and visitors; and could equally apply to the life and vitality of businesses, neighborhoods, the city and county, and to our economy. Ideally, measurable Quality of Life indicators would be developed in partnership with relevant private, community, and non-governmental organizations. Further, Quality of Life indicators should not be constrained by a perceived scope of the Plan or by outdated level of service metrics (i.e. miles of road constructed for transportation). Consider the following Quality of Life parameters, and how the built environment and preservation of natural features play a role in these measures:

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- Human health, socio-economic equity and well-being, including safety and security.
- Economic diversity, vitality, resiliency, and sufficiency (i.e., not “growth” that implies unrestrained development and consumption) and employment opportunities for all.
- Good governance, a peaceful society, and levels of satisfactory public participation.
- Health of the environment and natural resources to sustain all other Quality of Life indicators including resiliency and recovery from natural hazards.

**Recommendation 4.3.** Review county-level health statistics and investigate potential analyses at the more granular zip code level. Consider poor health indicators such as asthma, diabetes, heart disease, infant mortality, mental health ailments, respiratory diseases, obesity, and stroke; and how quality of the natural and built environment may impact health indicators. For example:

- Accessibility, in linear feet, to Basic Services (see Housing, below).
- Average resident distance, in linear feet, to parks and open spaces.
- Linear feet of sidewalk per household.
- Miles of bike or multi-modal lanes and trails per person.
- Proximity of residential areas, in linear feet, to incompatible or hazardous uses.

**5. Land Use and Mobility**

Good land use and transportation practices are co-dependent. Walkability is enhanced with a vibrant mix of land uses within walking distances, bus operations require people to be on foot or riding bikes, and mass transit is dependent upon having a critical mass of people (living, working, etc.) to patronize ridership. Land use and mobility cannot be in silos.

**Urban Core and Multi-Modal Transportation District**

**Recommendation 5.1.** To emphasize transitioning to a community less reliant on cars, the Multi-Modal Transportation District (MMTD) is a useful existing instrument with the potential of being entirely mixed-use zoning and focus of urban infill with a vibrant urban core and walkable, connected, and compact developments; with the following caveats:

1. Ensure that planning and design standards (with CPTED and Complete Streets⁹), form-based land development code, and broad-based public consultations are included.

2. Embrace the good practices in s. 163.2517, F.S., ‘Designation of urban infill and redevelopment area’, and consider over time full implementation, with an emphasis on:
   - “... a collaborative and holistic community participation process ... to include each neighborhood ... to participate in the design and implementation ...”
   - “... the local government shares decision-making authority ...”
   - “Identify and adopt a package of financial and local government incentives ...”
   - “... partnerships with the financial and business community ...”

3. Consider how a thorough inventory of existing vacant and underutilized structures can be adaptively reused as an alternative to new developments.

4. Proposed increases in density and intensity should be incremental in nature, in particular, in areas that may impact long-established neighborhoods and historic districts. The fabric of our neighborhoods and resident’s Quality of Life should be strengthened and improved by implementing comp plan changes. At the same time, strong neighborhoods do not necessarily equate to stagnant neighborhoods.

5. Develop a regional stormwater management (RSWM) plan and construct more public/common regional stormwater management facilities within the MMTD. The RSWM plan would benefit from green infrastructure techniques, low impact development practices, and integration with greenways, the Urban Forest Master Plan, and multi-modal infrastructure (next item).

6. Efforts are supported with an expansion and fine-grain network of safe and pleasant walkable and multi-modal routes, access-ways, paths, and trails:
   - The City of Peachtree City, Georgia, is one example with over 100 miles of multimodal trails in an area of about 25 square miles.\(^{10}\) The type of allowed mobility includes golf carts, low speed motor vehicles (LSMVs), and electric personal assistive mobility devices (EPAMDs, e.g., Segways) - all maximum 20 mph; wheelchairs and bicycles (manual and electric); all non-motorized vehicles including roller skates and skateboards; and, of course, pedestrians.
   - Consider adopting incentives\(^{11}\) as noted in s. 163.2517(3)(j), F.S., to encourage private sector cooperation in land acquisition, granting of easements, and the implementation of multi-modal infrastructure.
   - Consider commercial or mixed land uses at multi-modal infrastructure nodes and trailheads to help build the recreational and nature-based tourism industry, e.g.: birding, hiking, mountain biking, horseback riding, track and field events, Capital City-related tourism, food and drink, historic properties/landmarks, etc.

Throughout Leon County

**Recommendation 5.2.** All residential communities should have reasonable access to Basic Services\(^{12}\) that may be in a nearby small commercial district, enterprise zone or entrepreneurial hub, or a rural agricultural industrial center. Basic Services should always include fresh produce and healthy foods markets, and a healthy environment that includes reasonable access to basic

\(^{10}\) [https://peachtree-city.org/216/Paths-Golf-Carts](https://peachtree-city.org/216/Paths-Golf-Carts).

\(^{11}\) Examples of incentives include waiver of license and permit fees, exemption of local option sales surtaxes, waiver of delinquent local taxes or fees, lower impact fees or concurrency costs, etc.

\(^{12}\) LEED for Neighborhood Development, and, the traditional Thai ‘puk soi’ (BC Hollister personal experience and MS ‘Sustainable Communities’ thesis; Bangkok, Thailand).
health care services (Endnote 1). Each node or hub would be linked with a comprehensive web of interconnected transportation linkages.

New housing developments and redevelopment can be screened for accessibility to Basic Services, and land use changes to commercial or mixed use proposed as needed. More detailed planning studies, in cooperation with current residents where applicable, can help prepare for future changes. Screening would identify and put priority attention on areas with food and health deserts and propose more urgent land use and mobility changes to address these basic human needs.

Recommendation 5.3. During site plan review, new developments and redevelopments should indicate their “mobility interface” or plans for mobility interconnections with other parts of the county. This may include, for example, walking access to greenways, adding a transit or bus stop, a new multi-modal path, bike lane connections, or Uber parking or loading areas.

Recommendation 5.4. Expand regional stormwater management planning and construct more public/common regional stormwater management facilities. Use innovative technology to improve the quality of our water, especially in the Wakulla Springs Protection Zone, such as having “smart” stormwater ponds that utilize continuous monitoring and adaptive technology and alternatives to septic systems where the extension of sewers is not feasible.

Recommendation 5.5. Consider adopting incentives as noted in s. 163.2517(3)(j), F.S., and/or other promotional or awards programs to encourage good practices such as LEED13 for neighborhood development and for building construction.

Recommendation 5.6. Consider all of the following together with land use decision-making:

- Plan for higher density with mixed use areas, Basic Service pods, or commercial nodes in appropriate locations to set the stage for more transit routes.
- Strengthen coordination with CRTPA and FDOT and emphasize the need for Complete Streets and more pedestrian-oriented, walkable, and multi-modal routes.
- Expand shuttle and other mobility options to meet specific needs and opportunities, e.g., from airport to downtown during Legislative Committees and Spring Session, to Doak and Bragg during football season; all may be pilot programs for possible future expansion.
- Further collaborate in regional discussions regarding high speed rail and passenger trains.
- Take a holistic view to the accommodation of a renewable energy grid in the built environment (next item).

Recommendation 5.7. In support of the City’s commitment to renewable energy, envision a future where solar panels blanket commercial buildings and homes, and city streetscapes are dotted with urban turbines and wind trees (Figure 2, below);14 and how land use and mobility planning can not only accommodate but fully embrace this more sustainable future.

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6. Housing

The traditional nuclear family with two parents and children has been evolving. There is an increasing number of aging seniors, single adults or childless households, and other non-traditional family structures. Communities that provide for the diversity of our changing population with a wide range of incomes also meet the needs of people over their lifetimes.

Recommendation 6.1. Housing policy and land development regulations should allow for the most flexible and diverse range of housing types and options, which may include, for example:

- Adaptive reuse of existing structures, revitalization, and historic preservation.
- Missing middle\(^\text{15}\) dwelling types include cottages, bungalows, and:\(^\text{16}\)
  - Accessory dwelling units (ADUs), live-work units, lofts and flats, duplexes, etc.
  - Bungalow courts and co-housing developments, including senior co-housing
  - Courtyard apartments, townhomes, small multi-plex, etc.
- Relaxation of setback requirements related to attached and detached structures.

Recommendation 6.2. Be open to all possibilities of adaptive reuse and property conversion for housing purposes, for example, a commercial strip mall converted to affordable housing units.\(^\text{17}\)

Recommendation 6.3. Accessory dwelling units (ADUs), the Tiny House, and similar dwellings are naturally more expensive per square foot because they lack the economies of scale of a typical single-family home. Yet, they can play an important role in facilitating compact urban forms needed to support viable public transit systems and may be a reasonable alternative to mid- or high-rise infill; and provide more diverse housing options including support for aging in place.

Recommendation 6.4. Consider adopting incentives as noted in s. 163.2517(3)(j), F.S., to encourage the development of the most flexible and diverse range of dwelling units.

7. In Closing

The Comp Plan can and should be simple and concise, and readily understood by the ordinary citizen; it can and should be without duplication, and it can still be comprehensive.

As a final recommendation, try to enjoy the update process 😊.

\(^{15}\) Missing Middle Housing Brief. Created for AARP Florida by Opticos Design, Inc. November 8, 2018.

\(^{16}\) Most were common in pre-1940s Traditional Neighborhood Developments (TNDs).

\(^{17}\) Example: Norwich Corridor, Brunswick, Georgia. See Figure 3, below.
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Endnote 1. Basic Services should always include grocery stores or markets that provide fresh produce and healthy foods, and a healthy environment that includes reasonable access to basic health care services. Basic Services may also include:

- Barber and hair salon
- Bike or other mobility device rental and parking areas
- Coffee and sandwich shops
- Community center
- Day care and schools
- Fitness/recreational center
- Food services and restaurants
- Laundry/cleaners
- Library and bookstores
- Parks and outdoor recreation
- Pharmacy
- Senior services
- Transit stop
- Worship, places of -

Other enterprises include banks, building or garden supplies, furniture and furnishings, hardware, post office, theatre, museum or cultural center; and many others.

Figure 3. Norwich Corridor, Brunswick, Georgia (image courtesy of Danielle Irwin)

18 Director of Cummins Cederberg’s Tallahassee Office https://www.cumminscederberg.com/.