



# **PUBLIC COMMENTS**

**Received through  
April 17, 2025**

**Broward County Board of County Commissioners  
Broward County Planning Council**



**From:** [Jean Dolan](#)  
**To:** [Von Stetina, Deanne](#)  
**Cc:** [David Recor](#)  
**Subject:** RE: BrowardNext Update  
**Date:** Thursday, December 5, 2024 2:31:11 PM

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Deanne – Pompano only has this one comment so far:

1. *Consider the addition of affordable housing opportunities on lands designated Recreation and Open Space (mimic Community Facilities permitted use and criteria up to 5 acres) or other Permitted Uses as appropriate.* – Pompano does not support this. It would make it too easy to entitle remaining golf courses without a Comp Plan amendment. Commercial and industrial land is already subject to potentially incompatible affordable housing development due to Live Local, we don't need communities with private golf courses being consumed by housing without proper compatibility and sustainability (drainage) review.

Thanks for the opportunity to review.

Jean



Hours of Operation Mon – Thurs 7am to 6pm



**From:** [mmadfis@gmail.com](mailto:mmadfis@gmail.com)  
**To:** [Planning Council](#)  
**Cc:** [leannbarber@gmail.com](mailto:leannbarber@gmail.com)  
**Subject:** The Broward County comprehensive plan should include food policy.  
**Date:** Wednesday, January 8, 2025 10:06:49 AM

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The Broward County comprehensive plan should include food policy. Currently we have no food policy in Broward County at all. It's left up to the industry. The access to and quality of our food is his primary to the population's health and economic well-being. Without any plan at all we are likely to face serious issues in the future just relying on the industry. We are a County heading into food insecurity. Unlike other Florida counties We have no production in our county of tabletop foods.

Architect Michael Madfis  
520 SW. 16th Ct.  
Fort Lauderdale, FL 33315  
954-854-8788 [mmadfis@gmail.com](mailto:mmadfis@gmail.com)

**From:** [Maximiliano Goldstein](#)  
**To:** [Planning Council](#); [Blake Boy, Barbara](#)  
**Subject:** Comments for BrowardNext  
**Date:** Wednesday, January 8, 2025 2:20:16 PM

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Good afternoon Barbara and other Planning Council Staff,

For the BrowardNext update, there are three things I'd like to see included, all related to transportation policies.

The first is that it is mandated/prioritized that the county adopts a multimodal level of service standard that places more priority on frequent transit and for safe and connected walking and biking than current standards allow. I know that the previous BrowardNext plan included a goal of adopting a new standard, but it hasn't been done yet and it needs to happen as our county continues to urbanize.

The second is that I believe the BrowardNext plan should give priority to transit operations on corridors identified in the PREMO plan, for example by making it standard policy that such corridors be redesigned with transit-only lanes/facilities. This way, as those roads get repaved/resurfaced, FDOT and our county agencies can do the prep work for those future transit facilities to make the actual construction less time consuming and costly.

The third is that the county should adopt the Broward Safety Action Plan and Low Stress Multimodal Master Mobility plan as mandatory/enforceable documents, and require projects on county and state owned facilities to use the guidelines and designs identified in those two plans. I know that the two plans are not finished yet, but they will be finished very soon and need to have teeth to improve the safety of our transportation network.

Let me know if you have any questions or concerns!

Kind regards,  
Max

**From:** [Lourdes Donikian](#)  
**To:** [Planning Council](#)  
**Subject:** Food planning for Broward County  
**Date:** Wednesday, January 8, 2025 8:50:08 PM

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Dear Sir/Madam,

Please, the planning for food distribution for Broward County it's included in the master plan.

Sincerely,  
Lourdes Donikian

**From:** [sueregev@gmail.com](mailto:sueregev@gmail.com)  
**To:** [Planning Council](#)  
**Subject:** Comprehensive Plan Issue  
**Date:** Thursday, January 9, 2025 8:56:17 AM  
**Importance:** High

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Dear Broward County Planning Council,

I hope this message finds you well. As Broward County works on amending its comprehensive plan, I would like to draw your attention to a critical oversight: the absence of provisions for food policy.

The access to and quality of our food is vital to our population's health, as well as our environmental and economic well-being. Relying solely on industry regulations is not enough to ensure the necessary standards are met.

It is imperative that food policy is included in the comprehensive plan to safeguard the health of our residents and the sustainability of our local economy. Please consider this matter with the importance it deserves.

Thank you for your attention to this important issue.

Thank you Kindly,

Susan Regev  
954-857-4975

**From:** [jaime@thefruitfulfield.org](mailto:jaime@thefruitfulfield.org)  
**To:** [Planning Council](#)  
**Subject:** Food Planning should be in the comprehensive plan  
**Date:** Thursday, January 9, 2025 12:05:08 PM

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Dear Broward County Planning Council,

I read the county is updating the Comprehensive Plan.

I hope this message finds you well. As Broward County works on amending its comprehensive plan, I would like to draw your attention to a critical oversight: the absence of provisions for food policy. The access to and quality of our food is vital to our population's health, as well as our environmental and economic well-being. Relying solely on industry regulations is not enough to ensure the necessary standards are met.

Through COVID, we learned that FOOD ACCESS is an important piece of urban planning. Broward county is primarily an urban area and a plan for food access should be a part of the comprehensive plan.

Access to fresh food is considered to be a human right. Florida is a leading producer of fruits and vegetables. Most are shipped outside the area. Broward county is between two of the leading counties for food production. Yet during COVID, food was left to rot in the fields because there was no direction or plan to remove it and get it to the tables of local residents.

It is imperative that food policy is included in the comprehensive plan to safeguard the health of our residents and the sustainability of our local economy. Please consider this matter with the importance it deserves.

Thank you!

Jaime Castoro  
954 922 0220

**From:** [Carrie Roach](#)  
**To:** [Planning Council](#)  
**Subject:** Food Policy: BC Planning Council\_ comprehensive plan needed  
**Date:** Friday, January 10, 2025 5:00:05 PM

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Dear Broward County Planning Council,

I hope this message finds you well. As Broward County works on amending its comprehensive plan, I would like to draw your attention to a critical oversight: the absence of provisions for food policy.

The access to and quality of our food is vital to our population's health, as well as our environmental and economic well-being. Relying solely on industry regulations is not enough to ensure the necessary standards are met.

It is imperative that food policy is included in the comprehensive plan to safeguard the health of our residents and the sustainability of our local economy. Please consider this matter with the importance it deserves.

Thank you for your attention to this important issue.

Sincerely,

Carrie Roach

Broward County Resident since 1985

Community Member of the State of Florida since 1957

<https://www.linkedin.com/in/carrie-roach-0a370120/>



**From:** [Leann Barber](#)  
**To:** [Teetsel, Dawn](#)  
**Cc:** [mmadfis@gmail.com](mailto:mmadfis@gmail.com)  
**Subject:** Re: The Broward County comprehensive plan should include food policy.  
**Date:** Saturday, January 11, 2025 12:07:47 AM

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Hi Dawn,

Michael copied me on this email as I am very involved in urban gardening in Broward County. I am also involved in affordable housing and homeless issues. I'm not sure your process for taking comments, but I'll make a couple here, which you can use as you see fit.

Having studied the housing crisis for several years now, it seems to me that the fundamental issues are:

- 1) our housing design is not aligned with today's demographics. New houses are being built today 3-bed, 2-bath, to accommodate the "standard" family size of 2 adults that share a bedroom and 2 children that don't share. The reality is that the vast majority of households are different from that. So you have over capacity, houses being occupied by a single person or two, or houses being shared by multiple adults and children maybe related, maybe not, with lack of the appropriate separation and privacy.
- 2) it is almost impossible to have adaptive reuse of the property you own. Land use restrictions, permitting process, etc. means that as the family grows, shrinks, ages, etc. the government/banking system/land developers are so intent on maintaining "the look" of the neighborhood and a commodity for financing mortgages that the family cannot utilize the property in the best possible use. Maybe it would be better to make an addition or rent out a room, or subdivide a lot, but most of these things are nearly impossible. This leads to people having to disrupt their lives, move to a new neighborhood, loose connections with family and friends, etc. We think it's a great idea to simply sweep the granny to an old folks home rather than make an accommodation to allow her to age in place, being a resource to the community, looking after the children, etc.
- 3) It makes no sense to try to solve this problem with incremental building and not addressing the existing housing stock, especially in a county that is completely developed. Whenever I raise the issue of changes to zoning, since that is what got us into this pickle, I'm told it is a sacred cow and cannot be changed. It has to change, as it is the only way we can accommodate the reality of the way people live today. Houses, especially those in the mid and lower price ranges should be built in a much more modular fashion to accommodate multiple dwelling units and allow for flexibility of occupancy. Student housing is a great example, four ensuite bathrooms with shared kitchen and small living room. I don't see any of this type of housing being built in Broward, but it should be readily available for anyone in an entry level position, or on a limited income.

The county cannot build its way out of this problem, so it's bad policy to interfere with a property owner's desire to adapt his/her property to meet his changing circumstances.

on the food front, echoing Michael.

- 1) in 2019, the state legislature passed the gardening bill to stop local government interference with citizens that want to grow their own food. The county should encourage and celebrate anyone that wants to take the initiative to improve their own health and financial wellbeing, but 6 years later, the county is

still trying to thwart the efforts of everyday residents to grow their own food. When is the county going to recognize that this is bad policy and start to empower people to take more responsibility for their own health? Do we really think that "curb appeal" should override a family's right to develop their own legitimate food sources? Can't there not be a discussion and compromise without code enforcement patrolling the neighborhoods and fining taxpayers that are living peacefully and committing no crime?

It's bad policy to thwart the efforts of citizens and taxpayers that are trying to legally and peacefully make a better life for themselves. This should be encouraged rather than regulated, restricted, and punished. The current approach contributes to poverty, homelessness, poor health, despondency, and crime.

Kind regards,

Leann Barber  
Made in Broward  
208 NW 28th Terrace  
Fort Lauderdale FL 33311  
954-303-6750

**From:** [Marianne Winfield](#)  
**To:** [Planning Council](#)  
**Subject:** Request for Comments  
**Date:** Tuesday, January 28, 2025 1:44:36 PM

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Good afternoon,

I have been following the Broward Next presentations over the last several months and in my humble opinion the presentations are filled with worthwhile information.

I have been a resident of Broward County since 1976 and have watched the growth and amazed that "no more land to build" has been a myth since everywhere we look something is being built.

My personal comments relate to what we have witnessed in Southern California in the last few weeks.

We live in fear of what could happen if there is a hurricane that will impact Broward County - what is our water supply capable of handling?

The comments I have heard are at least with a hurricane we have a few days notice - what impact will we have in evacuation areas since getting across many streets and roadways is already impossible on most days.

Housing is already an issue - where will people evacuate to if something catastrophic occurs.

I don't expect any response to these comments - there is not much that can be said..

Thank you for the opportunity to share my thoughts.

Marianne Winfield

**From:** [Cooper, Joy](#)  
**To:** [Geller, Steve](#)  
**Cc:** [Blake Boy, Barbara](#); [Furr, Beam](#); [MBrogan@Broward.org](mailto:MBrogan@Broward.org); [Udine, Michael](#); [Fisher, Lamar](#); [Davis, Aviance](#); [RMcKenzie@Broward.org](mailto:RMcKenzie@Broward.org); [HRogers@Broward.org](mailto:HRogers@Broward.org); [Cepero, Monica](#); [JErale@cohb.org](mailto:JErale@cohb.org); [Leroy, Vanessa](#)  
**Subject:** Todays Meeting  
**Date:** Thursday, January 30, 2025 9:23:51 AM

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Good morning ,

As mentioned, I am unable to attend today. Please include this as part of the public record.

Thank you!

Joy

Dear Commissioner Geller

Thank you very much for your service to our County. Over the years I have been involved with development and redevelopment efforts in our city, Hallandale Beach. I have also served in leadership positions on various boards including the Florida Redevelopment Agency Board.

As an eastern city that has been developed over the past 96 years, I understand the complexities of in-fill redevelopment. Many laws that we must follow are dated and often are one size rules that have stymied the ability to add much need housing units and additional commercial within our urban boundary.

While there have been many changes incorporated by your board to provide flexibility in governing development and land use, cities like Hallandale Beach have been hitting a wall when it comes to our ability to implement additional RAC units due to existing comprehensive plan requirements.

Broward County is remarkably diverse, and we are just seeing western cities utilizing their green fields for development. Cities like Hallandale Beach that are built out have no areas to add green space. Our city has been the most densely populated area for years at 10,000 per square mile. We are an urban city.

Within those 4.4 square miles we have seventeen parks of many sizes including a beach. While

we continue to try and expand open space the process is simply limited as there are not city owned sites to make an impact on the existing requirements.

Recently, Broward Next adopted changes to allow a percentage of onsite amenities to provide credit towards our open space requirements. They have also added a percentage for "shared use" parks. Our city has also adopted urban plazas and other changes to include roof amenities that add access to recreational opportunities. These are good steps but not are not impactful enough when it comes to compliance with comprehensive plan restraints.

I am reaching out to suggest just like Broward County created transformational changes from roads to Transportation Concurrency Areas the planning council and County Commission should consider establishing a Park and Open Space Concurrency Area for communities such as Hallandale Beach that are fully built out.

Our city declared our parks in perpetuity when we passed our Parks GO Bond. These parks add vitality and economic value to our community. They also require ongoing maintenance and upkeep. Even our beach is in constant need of maintenance and renourishment. These items cost millions of dollars.

Rather than requiring a set percentage of mandatory green space in our city, the county should provide an "in lieu of payment system." Developments would still be required to provide . public spaces where they make sense, but impact fees could be set for both city parks as part of small developments and in the case of developments of regional impact contribute to the county park system.

I will be unbale to attend the meeting but want to go on record with this concept. It is extremely timely as we look at ways to create viable infill development opportunities.

Sincerely,

Mayor Joy Cooper

cc: Ex. Dir. Barbara Blake-Boy

Mayor Beam Furr

Vice Mayor Mark Brogan

Broward Commissioners

County Administrator Monica Cepero

City Manager Dr Jermey Earle

Director Vannesa Leroy

**From:** [Garcia-Arteaga, Jacqueline](#)  
**To:** [Blake Boy, Barbara](#)  
**Subject:** FW: Follow up--Potential Geller Amendments  
**Date:** Thursday, January 30, 2025 4:09:59 PM  
**Attachments:** [image001.png](#)

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**See Hollywood below. Thanks for the compliment, Barbara! We're a great team!**

**JACQUELINE GARCIA-ARTEAGA, ESQ.**  
**CHIEF OF STAFF**

**OFFICE OF COMMISSIONER STEVE GELLER OF DISTRICT 5**

115 S. Andrews Avenue, Room 414, Fort Lauderdale, FL 33301

PHONE: 954-357-7005 | [jgarciaarteaga@broward.org](mailto:jgarciaarteaga@broward.org) | [www.broward.org/commission/district5](http://www.broward.org/commission/district5)



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**From:** Andria Wingett <[AWingett@hollywoodfl.org](mailto:AWingett@hollywoodfl.org)>

**Sent:** Tuesday, January 28, 2025 7:15 PM

**To:** [steve@gellerlawfirm.com](mailto:steve@gellerlawfirm.com)

**Cc:** [jgarciaarteaga@broward.org](mailto:jgarciaarteaga@broward.org) ; Raelin Storey <[rstorey@hollywoodfl.org](mailto:rstorey@hollywoodfl.org)>; [gkeller@hollywoodfl.org](mailto:gkeller@hollywoodfl.org);  
Damaris Henlon <[DHENLON@hollywoodfl.org](mailto:DHENLON@hollywoodfl.org)>; Anand Balram <[ABALRAM@hollywoodfl.org](mailto:ABALRAM@hollywoodfl.org)>; Deena Kapp  
<[dkapp@HollywoodFL.org](mailto:dkapp@HollywoodFL.org)>; Joann Hussey <[JHUSSEY@hollywoodfl.org](mailto:JHUSSEY@hollywoodfl.org)>; Vincent Morello  
<[vmorello@hollywoodfl.org](mailto:vmorello@hollywoodfl.org)>; Russell Long <[RLong@hollywoodfl.org](mailto:RLong@hollywoodfl.org)>; [bkopec@broward.org](mailto:bkopec@broward.org)  
[[MAILTO:bkopec@broward.org](mailto:bkopec@broward.org)]; Alicia Vereia-Feria <[AVEREA-FERIA@hollywoodfl.org](mailto:AVEREA-FERIA@hollywoodfl.org)>; Adam Reichbach  
<[AREICHBACH@hollywoodfl.org](mailto:AREICHBACH@hollywoodfl.org)>; Gus Zambrano <[GZAMBRANO@hollywoodfl.org](mailto:GZAMBRANO@hollywoodfl.org)>; Mary Johns  
<[MJOHNS@hollywoodfl.org](mailto:MJOHNS@hollywoodfl.org)>

**Subject:** Follow up--Potential Geller Amendments

Commissioner Geller,

Thank you for brainstorming with staff on some of the upcoming amendments you are thinking about proposing. Please note that the following reflects an unresearched high-level recommendation of city staff and should not be interpreted as the official position of the City of Hollywood.

#### Barrier Island

The existing county-imposed density cap of 25 units per acre on the Barrier Island has created challenges, particularly as many existing structures exceed this threshold. Due to the age of these developments, many no longer reflect best practices in building siting, configuration, or compatibility with surrounding areas. Furthermore, these older buildings often fail to comply with FEMA requirements, potentially leaving residents at increased risk due to habitable units located below flood elevation.

Staff supports addressing non-conforming structures through potential policy amendments that align land use policies with existing conditions. Such amendments should allow for beach revitalization. Additionally, the intersection of insurance requirements and development feasibility necessitates careful examination to guide sustainable redevelopment policies.

Policies enabling like-for-like rebuilding after disasters or demolitions—whether through replacement of the number of units or habitable space—should integrate FEMA compliance and safety considerations into new

development. Staff encourages exploring an "Activity Center"-like designation or overlay tailored to the beach area. This approach could establish a pool of redevelopment units that can be reallocated to support redevelopment across the island. It would provide site-specific flexibility for properties to exceed the density target in certain areas without increasing the overall density island-wide.

It is equally important that proposed policies distinguish between hotel and residential density regulations to reduce confusion and ensure compliance.

The rebuilding process also presents an opportunity to enhance the island's resilience by incorporating infrastructure improvements, such as raising streets and undergrounding utilities. These measures would strengthen the island's overall infrastructure against future hazards. Policies should include provisions for establishing reasonable rebuild timelines to avoid long-term vacancies and ensure timely revitalization.

Finally, staff supports allowing greater flexibility for taller structures during redevelopment. This approach could encourage innovative design while minimizing environmental and infrastructure strain. Staff are supportive of policies that address non-conformity, with respect to density, height and parking. Generally staff would encourage that flexibility be left at the discretion of local municipalities, as opposed to being governed too prescriptively by the County.

#### Geller Amendment

Staff supports the redevelopment of underutilized commercial properties along transit corridors as part of a broader strategy to enhance mobility, improve modal splits, and optimize land use. Including residential areas under the Geller Amendment would allow the city to respond more effectively to redevelopment trends occurring in commercial sites. This would enable better transitions between high-density development and stable residential areas while incorporating urban design principles that promote sustainable, well-designed cities. Such transitions would also activate transit-oriented corridors, providing opportunities for affordable and attainable housing while fostering a balanced and integrated community fabric.

#### Protected Economic Zones

Staff encourage that the County's Land Use Plan should prioritize the preservation of protected economic zones, safeguarding them from residential conversion. Employment lands are a finite resource that are increasingly threatened by state interventions such as the Live Local Act, which encourages residential redevelopment. Staff emphasizes the critical importance of preserving regionally significant areas, particularly those around the port and airport, to ensure economic and municipal fiscal sustainability. Preventing these areas from being converted to non-economic uses is essential to maintaining their role as key drivers of regional prosperity.

Staff also recommends the County consider prescribing employment density targets in line with modern planning practices and urban economics. Prescribing employment density could ensure that municipalities provide sufficient job opportunities for their residents, reducing vehicle miles traveled, fostering local economic stability, and supporting transit viability. Policies promoting proximity between jobs and housing would improve quality of life and reduce the environmental impact of long commutes. For reference, best practices include planning frameworks from cities such as Vancouver and Portland, which emphasize employment targets within transit-oriented development areas to balance jobs and housing needs.

We appreciate the opportunity to provide input on these important matters and remain committed to developing policies and strategies that enhance the City of Hollywood's resilience, economic sustainability,

and quality of life. Should additional information or discussion be required, please do not hesitate to contact us.

**Andria Wingett**

Director, Development Services

Department of Development Services

**P.O. Box 229045**

**City of Hollywood, Florida 33022**

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**Email:** [AWingett@hollywoodfl.org](mailto:AWingett@hollywoodfl.org)

**Telephone:** [954-921-3471](tel:954-921-3471) x6621

**Fax:** [954-921-3347](tel:954-921-3347)

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**[www.HollywoodFL.org](http://www.HollywoodFL.org)**

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**From:** [Garcia-Arteaga, Jacqueline](#)  
**To:** [Blake Boy, Barbara](#)  
**Subject:** Tamarac Email Chain  
**Date:** Thursday, January 30, 2025 4:08:58 PM  
**Attachments:** [image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[image010.png](#)  
[image012.png](#)  
[image013.png](#)

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**See email chain below.**

**JACQUELINE GARCIA-ARTEAGA, ESQ.**  
**CHIEF OF STAFF**

**OFFICE OF COMMISSIONER STEVE GELLER OF DISTRICT 5**

115 S. Andrews Avenue, Room 414, Fort Lauderdale, FL 33301

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**From:** Stone, Ralph <[RSTONE@broward.org](mailto:RSTONE@broward.org)>  
**Sent:** Tuesday, January 21, 2025 4:42 PM  
**To:** Kopec, Barbara <[BKOPEC@broward.org](mailto:BKOPEC@broward.org)>; [steve@gellerlawfirm.com](mailto:steve@gellerlawfirm.com)  
**Cc:** Garcia-Arteaga, Jacqueline <[JGARCIAARTEAGA@broward.org](mailto:JGARCIAARTEAGA@broward.org)>  
**Subject:** RE: [EXTERNAL] \*\*Upcoming 2.16.4 Policy Discussion on Jan. 30 10 AM

Sure, when we (Barbara Boy and the city Planning Directors) crafted this split, they recognized issue was that the City's do not have the depth of resources to fund even a single affordable rental project, which is where the overwhelming need is. The 50% that goes to the County goes into the Affordable Housing Trust Fund which supplements the large funding commitments that the BCC makes each year. For example, this year the funding amount for the FY 25 RFA is \$20M. In addition the gap deals that are selected are guaranteed HFA bond funding, which is generally another \$20M-\$30M dollars per project. No city can match that level of funding which is required for a rental deal.

Which means the cities generally add their 50% of the funding to home repair and purchase assistance programs, which are already funded in each city with CDBG, HOME and SHIP grant funds.

Final thought, Broward is still last of all counties in the state for available affordable units servicing households at 60% AMI. Coincidentally, half of ALL employees in Broward County (meaning in each city) earn 60% AMI or less. None of these households can afford to purchase a home and most cannot afford rent in the available rental stock.



**Ralph Stone**

**Director Housing Finance Division**

**Executive Director Housing Finance Authority**

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Office: 954-357-4900 | Fax: 954-357-8221

[RStone@Broward.org](mailto:RStone@Broward.org)

[www.Broward.org/housing](http://www.Broward.org/housing)

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**From:** Kopec, Barbara <[BKOPEC@broward.org](mailto:BKOPEC@broward.org)>  
**Sent:** Tuesday, January 21, 2025 2:10 PM  
**To:** [steve@gellerlawfirm.com](mailto:steve@gellerlawfirm.com); Stone, Ralph <[RSTONE@broward.org](mailto:RSTONE@broward.org)>  
**Cc:** Garcia-Arteaga, Jacqueline <[JGARCIAARTEAGA@broward.org](mailto:JGARCIAARTEAGA@broward.org)>

**Subject:** RE: [EXTERNAL] \*\*Upcoming 2.16.4 Policy Discussion on Jan. 30 10 AM

Hi Ralph:

Senator Geller asked that I forward the below email to you from the City of Tamarac and if you could please provide the Senator with your response. Thank you.



*Barbara Kopec  
County Commission Aide  
Commissioner Steve Geller  
District 5  
Broward Government Center  
115 S. Andrews Avenue  
Room 416  
Ft. Lauderdale, FL 33301  
Phone: (954) 357-7005*

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**From:** Steve Geller <[steve@gellerlawfirm.com](mailto:steve@gellerlawfirm.com)>  
**Sent:** Tuesday, January 21, 2025 1:42 PM  
**To:** Kopec, Barbara <[BKOPEC@broward.org](mailto:BKOPEC@broward.org)>  
**Cc:** Garcia-Arteaga, Jacqueline <[JGARCIAARTEAGA@broward.org](mailto:JGARCIAARTEAGA@broward.org)>  
**Subject:** RE: [EXTERNAL] \*\*Upcoming 2.16.4 Policy Discussion on Jan. 30 10 AM

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Please forward to Ralph Stone and ask him for his response.

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**From:** Kopec, Barbara <[BKOPEC@broward.org](mailto:BKOPEC@broward.org)>  
**Sent:** Tuesday, January 21, 2025 12:01 PM  
**To:** Steve Geller <[steve@gellerlawfirm.com](mailto:steve@gellerlawfirm.com)>  
**Cc:** Garcia-Arteaga, Jacqueline <[JGARCIAARTEAGA@broward.org](mailto:JGARCIAARTEAGA@broward.org)>  
**Subject:** FW: [EXTERNAL] \*\*Upcoming 2.16.4 Policy Discussion on Jan. 30 10 AM

FYI. Regarding next week's meeting.

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**From:** Maxine Calloway <[Maxine.Calloway@tamarac.org](mailto:Maxine.Calloway@tamarac.org)>  
**Sent:** Tuesday, January 21, 2025 11:22 AM  
**To:** Geller, Steve <[SGELLER@broward.org](mailto:SGELLER@broward.org)>; Garcia-Arteaga, Jacqueline <[JGARCIAARTEAGA@broward.org](mailto:JGARCIAARTEAGA@broward.org)>  
**Cc:** Kopec, Barbara <[BKOPEC@broward.org](mailto:BKOPEC@broward.org)>; [levent.sucuoglu@tamarac.org](mailto:levent.sucuoglu@tamarac.org); Maher Mansour <[Maher.Mansour@tamarac.org](mailto:Maher.Mansour@tamarac.org)>; Tanya Sterling <[Tanya.Sterling@tamarac.org](mailto:Tanya.Sterling@tamarac.org)>  
**Subject:** RE: [EXTERNAL] \*\*Upcoming 2.16.4 Policy Discussion on Jan. 30 10 AM

Commissioner Geller,

The City of Tamarac will not have representation at the upcoming Policy Discussion. We however offer the following point of discussion for your consideration.

- The City currently has an Affordable Housing Trust Fund and strongly objects to the retention of only fifty (50%) percent of the in-lieu fees as outlined in Section (10) of the Policy. We recommend that the Policy be amended to allow municipalities with Affordable Housing Trust Funds be allowed to retain one hundred (100%) or all in lieu fees paid to the applicable municipality.

Please advise if any additional information is needed for your consideration.

Best regards,

Maxine

**Maxine A. Calloway, Esq. AICP**  
Deputy City Manager  
7525 NW 88th Ave, Tamarac, FL 33321  
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**From:** Geller, Steve <[SGELLER@broward.org](mailto:SGELLER@broward.org)>  
**Sent:** Tuesday, January 14, 2025 10:49 AM  
**To:** Garcia-Arteaga, Jacqueline <[JGARCIAARTEAGA@broward.org](mailto:JGARCIAARTEAGA@broward.org)>  
**Cc:** Kopec, Barbara <[BKOPEC@broward.org](mailto:BKOPEC@broward.org)>  
**Subject:** [EXTERNAL] \*\*Upcoming 2.16.4 Policy Discussion on Jan. 30 10 AM

Importance: High

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## YOU'RE INVITED TO PARTICIPATE IN A POLICY DISCUSSION ABOUT LUP 2.16.4 "THE GELLER AMENDMENT"

The meeting is set for January 30, 2024, and will be held at  
Broward County Government Center in the Workshop Room.  
115 S Andrews Avenue, Room 430 Fort Lauderdale, FL 33301

**from 10:00 am - 12:00 PM**

**PLEASE REGISTER FOR THE MEETING ON THE EVENTBRITE LINK BELOW.**



**Eventbrite Link:** <https://www.eventbrite.com/e/policy-discussion-on-broward-county-lup-2164-the-geller-amendment-tickets-1118014404179?aff=oddtcreator>

Dear All,

As you may recall, Broward County Land Use Plan Policy 2.16.4 was initially adopted in early 2021. After the implementation of the ordinance, I held a roundtable discussion in 2022 to address municipal concerns and ideas regarding retail or office requirements and payment in lieu of fees and the updated ordinance was effective January 2023. Please follow the [Link to BCLUP Policy 2.16.4](#), for the effective language, which also includes the passenger rail station update. I would like to hold a roundtable discussion on potential policy modifications that continue to focus on creating cities and mixed-use opportunities, including a strong residential component, as well as retail and office uses to support the same. Other changes will also be considered, such as the potential for redevelopment East of the Intracoastal.

**I have scheduled the discussion for Thursday, January 30<sup>th</sup> at Governmental Center East, 115 South Andrews Avenue, Room 430 from 10 am to 12 noon.**

If you cannot make it to the meeting, feel free to send in your points of discussion in

writing before the date of the meeting to my email: [sgeller@broward.org](mailto:sgeller@broward.org) by Jan. 29 5pm, and I will be sure to read your comments into the record. I wish you all a happy holiday season and look forward to seeing you in the new year.

Warmly,  
Steve Geller.

STEVE GELLER, ESQ.  
COMMISSIONER FOR DISTRICT 5 OF BROWARD COUNTY  
OFFICE OF COMMISSIONER STEVE GELLER OF DISTRICT 5  
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## Comments Received from the Broward MPO on February 6, 2025 (condensed for ease of reference)

### General Comments:

- Broward County currently uses Level of Service (LOS) as a primary consideration for transportation needs. The way the system is set up now gives greater emphasis to moving vehicles.
  - The emphasis on congestion has implications for roadway safety. Adding turn lanes and widening roads quite often can make it more difficult for vulnerable roadway users to cross streets. There are various examples where there is no pedestrian crosswalk because of impacts to traffic flow.
  - Is there an opportunity to adjust the measures that set the expectations for the roadway system to add an emphasis for addressing safety in combination with congestion?
  - The document outlines numerous strategies (e.g., climate resilience, disaster recovery, affordable housing), is there a way to include clear, measurable outcomes or timelines? Consider adding specific benchmarks or indicators of success to track progress effectively.
- 

### Targeted Redevelopment Vision

“...to direct growth to areas which maximize the efficient use of land and create places to shop, work and play.”

**Comment:** growth should also be directed consistent with the county's investments in transit, especially premium transit.

---

### Targeted Redevelopment Vision

To facilitate the availability of affordable housing in proximity to ^ public facilities, services, amenities, and economic opportunities, the County's “Affordable Housing Density Bonus Program” shall be structured to target established and planned “activity centers,” such as downtowns and transit corridors and hubs.

**Comment:** transit (especially premium transit options),

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### Multi-Modal Vision

**STRATEGY MM-1:** Make the best use of the regional transportation network to move people, goods and services safely and efficiently while incorporating and promoting Complete Streets principles where appropriate in a context sensitive manner.

**Comments:** Remove “where appropriate”. Complete Streets principles/concept should be considered in every corridor. The Term “where appropriate” should be considered when identifying a specific element or treatment.

The County has adopted the Complete Streets Guidelines 2.0. However, transportation projects continue to be designed using County engineering standards. Please consider a strategy to promote complete streets to clarify usage of CS guidelines 2.0

“Complete Streets” are roadways designed and constructed for all modes of transportation – automobiles, buses, bicycles, pedestrians, and freight vehicles, and for all users, regardless of age or ability. Complete Streets enhance the community’s quality of life, results in positive health benefits, and have a positive impact on the economy. Broward County’s transportation network is largely defined and the ability to add new links and lanes for cars is limited. The County must utilize the existing and planned regional transportation network to move people, goods and services safely and efficiently, making use of all modes of transportation, including pedestrian, bicycle and transit.

**Comments:** Recommended revised language: *“Complete Streets” are roadways designed, constructed and operated for safe, comfortable, and convenient travel via all modes of transportation – automobiles, buses, bicycles, pedestrians, and freight vehicles, and for all users, regardless of age or ability. Complete Streets improve safety, enhance the community’s quality of life, results in positive health benefits, reduce environmental impacts, promote equity and have a positive impact on the economy. Broward County’s transportation network is largely defined and the ability to add new links and lanes for cars is limited. The County must utilize the existing and planned regional transportation network to move people, goods and services safely and efficiently, making use of all modes of transportation, including pedestrian, bicycle and transit.*

Broward County shall promote, accommodate, and construct Complete Streets features throughout the County, consistent with the County’s jurisdictional responsibilities, and in a “context sensitive” fashion (e.g. consideration of the surrounding area, the primary existing and planned function of the roadway, including the prevalence of freight traffic and safety).

**Comments:** Should be noted that complete streets are needed to enhance other county investments in transit (PREMO).

#### Implementation strategies include:

- Accommodating Complete Streets features and technology into County-maintained roadways ~~where practical, context sensitive, and financially feasible~~, and capitalize on intergovernmental coordination and technical assistance opportunities to identify and achieve efficient interconnected multi-modal networks throughout the County.
- Supporting municipal, metropolitan planning organization, and state Complete Streets projects, including technical and financial support when available.

**Comments:** Expand Implementation Strategies to include data driven techniques, such as achieving Bike / Ped LTS 1 or 2.

Strike these words. ~~where practical, context sensitive, and financially feasible,~~

Notes explaining recommendation:

- We recommend removing “where practical” and “financially feasible”. This could lead to limited or no implementation of strategies.

-Complete Streets are not prescriptive. Developing context sensitive solutions is key in the implementation of Complete Streets strategies. We would recommend referencing the FDOT Context Classifications or directing staff to develop context classification for County-owned facilities.

---

## **Multi-Modal Vision**

**STRATEGY MM-2:** Recognize and address the transportation and housing connection.

**Comments:** Revise Strategy MM-2 to clarify this issue is about transportation for residents who do not have ability to own their own car (age, disability, or income status). For instance, 32% of Broward population is considered Transportation Disadvantaged. See pg's 16 - 17 of [Link](#)

**Also** here is reference to the housing and transportation brief prepared by FDOT - there is very good language about the connection between transportation and housing. Affordability is just one concern: [Link](#)

Implementation strategies include:

- Promote and support redevelopment and mixed use opportunities within and along ~~major transportation hubs~~ and corridors;
- Support residential affordable housing bonus densities within and along major ~~transportation~~ corridors, ^ stations, and redevelopment areas.

**Comments:**

2 new suggested Implementation Strategies:

- 1 - ensure county's investments for affordable housing are strategically aligned with county's investments for transit.
- 2 - Promote and support implementing multimodal access (bike/ped) to major transportation hubs/stations and transit corridors.

~~major transportation hubs~~ → transit corridors

~~transportation~~ → transit

^ → transportation hubs/  
(Between corridors, stations)



## Multi-Modal Vision

**STRATEGY MM-3:** Promote and support a sustainable funding source for countywide transit and mobility needs.

**Comments:** Revise Strategy to reflect Surtax

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## Multi-Modal Vision

**STRATEGY MM-4:** Identify and implement a multi-modal level of service standard for redevelopment proposals.

**Comments:** We recommend recognizing the Multi Modal LOS tool developed as part of Broward County's Low Stress Multimodal Mobility Network Master Plan

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## World-Class Natural Resource Protection & Enhancement Vision

"...remaining dedicated to strengthening its policies and commitments in the region to protect and conserve natural resources, including the emerging importance of food systems planning."

**Comments:** Reference this goal in the development of transportation projects (encourage transportation projects utilize nature based solutions and water storage potential strategies)

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## Housing Affordability Vision

**STRATEGY AH-3:** The Broward County Land Use Plan shall include an Affordable Housing Density Bonus Program, including promoting a supply of smaller, traditionally affordable units, such as efficiency/studio occupancy units.

**Comments:** Need to mention the importance of location - especially within proximity to transit corridors. Maybe add that as part of the implementation strategies.

---

## Transportation Concurrency and Impact Fees

**POLICY 2.14.2** To maintain those level of service standards identified within the Broward County Comprehensive Plan and local comprehensive plans, Broward County shall, prior to final action on amendments to the Broward County Land Use Plan, determine whether adequate public facilities and services will be available when needed to serve the proposed development.

**Comment:**

Continuing to rely on vehicles, the Level of Service will potentially hinder smart and sustainable development that is accompanied by Complete Street Elements. We recommend revising this policy to recognize multimodal priority over vehicular traffic.

**POLICY 2.14.9** The impact analysis for proposed amendments to the Broward County Land Use Plan shall continue to consider as significant those regional roadway segments that are projected to experience, as a result of the net effect from the proposed amendment, an impact of three percent (3%) or greater than the p.m. peak hour level of service capacity for those regional roadway segments.

**Comments:**

- This policy should include language to ensure Complete Streets elements/amenities are acceptable mitigating strategies.
  - We would recommend looking into Vehicle Miles Traveled (VMT) to evaluate transportation impacts over LOS as it has been proven to be more effective in other jurisdictions.
- 

**Complete Streets**

**POLICY 2.19.1** Broward County shall promote and encourage (re)development, and shall implement to the maximum extent feasible for those (re)development projects and lands owned by the County or within unincorporated areas, to take advantage of compact building design to preserve more open space, support a complete range of transportation choices, ^ make public transportation viable, reduce public infrastructure cost and improve the health condition of residents and the wider community, in a manner generally consistent with the *Broward Complete Streets Guidelines*, or equivalent principles.

**Comment:** (such as bicycle and pedestrian accommodations),

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**Climate Resiliency, Adaptation Actions Areas and Priority Planning Areas**

**POLICY 2.21.4** Broward County shall work cooperatively with local governments and transportation agencies to identify and evaluate transportation infrastructure at risk and help coordinate adaptation efforts for infrastructure immediately landward of coastal high hazard areas, in order to ensure functional access to emergency evacuation routes for coastal populations.

**Comment:** Include criticality (in addition to emergency evacuation routes)

## CLIMATE CHANGE RESILIENCE VISION

Southeast Florida is one of the most vulnerable regions in the United States to the impacts of climate change. Critical action to adapt to the consequences of climate change must occur at the local level through regionally coordinated planning and investments. Broward County has been active in prioritizing efforts to investigate vulnerabilities, improve climate preparedness and identify strategies to increase resilience to extreme weather. Working with the 4-County Southeast Florida Climate Change Compact, Broward County has contributed to the development of a Regional Climate Action Plan, a unified regional sea level rise projection, and vulnerability assessments focused on infrastructure, public health, and natural systems. Independently, the County has developed its own Climate Change Action Plan, and convenes both a countywide Climate Change Task Force and an **internal** Government Operations Work Group to assist in implementing priority actions necessary for climate change preparedness and emissions reductions needed to mitigate future warming and the potential for severe climate disruptions. As a community, we need to be aware of the local impacts of climate change, to understand the vulnerabilities of social systems, natural resources and infrastructure, and to work to develop and implement strategies to adapt and increase our resilience with the goal of reducing risk, avoiding economic losses, and improving community livability and the quality of our natural systems.

➡ **STRATEGY CCR-1:** Mitigate the effects of climate change by reducing greenhouse gas emissions by 2% per year to achieve a 50% reduction by 2030 and countywide carbon neutrality by 2050.

Reduction of heat-trapping greenhouse gas (GHG) emissions which cause global temperature rise is necessary to slow and limit the effects of climate change. According to the 201222 Broward County GHG Emissions Inventory, the main source of GHG emissions in Broward County is burning fossil fuels for electricity and transportation. In order to reduce emissions, energy sources must be diversified to include clean renewable energy for electricity and alternative fuels for transportation and the amount of energy consumed in buildings and for transportation must be reduced. The County must pursue regional strategies and participate in and support local efforts to increase energy efficiency and the use of renewables in order to reduce GHG emissions and mitigate the effects of climate change.

Broward County shall promote sustainable energy consumption through efficiency and conservation efforts, expand renewable and alternative energy accessibility, and create incentive programs to encourage the behavioral and operational transition to cleaner energy sources.

Implementation strategies include:

- Implementing strategies from the Renewable Energy Action Plan, Community Energy Action Plan and the Broward County Climate Change Action Plan and Regional Climate Action Plan.
- Implementing the County's Electric Vehicle (EV) Charging Infrastructure Strategy which includes pursuing municipal and public-private partnerships in order to equitably develop an expanded EV charging infrastructure network that provides supporting public access to alternative fuels and EV charging and opportunities for EV ownership.
- Reducing energy intensity of county and other commercial buildings by promoting energy efficiency practices that reduce energy consumption and encourage energy benchmarking consistent with the goals of at least 20% by 2025 through the Better Buildings Challenge and energy retrofits.

- Integrating transportation and land use decisions with emphasis on multi-modal transportation.
- Increasing the abundance of renewable energy projects, investments, and infrastructure across the County consistent with the County's support for a 2030% renewable energy portfolio by 2030 through public-private partnerships, encouraging financing options and County investment in solar projects.
- Decreasing fuel consumption by 10% by 2020 by improving and Accelerating non-carbon fuel investments and the transition to clean fuel and low or no emission vehicles by integrating multi-modal transportation and land uses that encourage the use of shared public transit proximate to urban areas a reduction in single occupancy vehicle trips and GHG emissions, encourage an increase in walking, bicycling and transit trips and provide affordable housing proximate to urban work centers and transit.

## ➔ STRATEGY CCR-2: Increase the resilience of our community to the effects of climate change.

Climate change, including sea level rise and severe storms, has the potential to fundamentally impact Broward County's beaches, coastal and inland communities, water supplies, natural systems, critical infrastructure and its economic core. An increase of 3 to 5 inches of sea level rise is expected locally by 2030 and up to 3.3 feet by 2070 (relative to 20400). As a community we need to plan and prepare for the impacts of sea level rise and other climate impacts and invest in resilient critical infrastructure, to sustain commerce, services, and natural resources vital to the health of our community and economy. Broward County shall consider and prepare for the following impacts in the planning and design of projects and operations of community services: severe tropical storms, temperature extremes, severe wet and dry seasons, sea level rise along the coast leading to coastal and inland flooding and rising groundwater levels, increased coastal erosion and increased stress and pressure on natural systems.

### Implementation strategies include:

- Requiring all land use and planning decisions within the regionally designated Adaptation Action Areas and Priority Planning Areas to consider and effectively address future climate predictions and recommendations of the countywide Resilience Plan for a 50-year planning horizon.

- Designating Adaptation Action Areas to identify areas vulnerable to coastal flooding, implement adaptation policies, and enhance and prioritize the funding of infrastructure adaptation projects.
- Applying the **regionally**-unified sea level rise projection for Southeast Florida when considering land use (including areas of potential population growth, natural system restoration, and infrastructure adaptation) and long-term functionality of appurtenant infrastructure, especially water management, drainage, water supply and water treatment systems, both coastal and inland.
- Delineating anticipated habitat transition zones from climate impacted areas and expand zones through land use changes to protect environmentally-sensitive greenways and reserves for migrating species.
- Furthering the integration of green infrastructure and natural systems into the urban environment to increase resilience to future climate change impacts.
- Preserving and protecting the County's natural shoreline with an emphasis on the expansion and preservation of sand dunes, protection of beaches from armoring and the encroachment of development, and conservation of our coral reefs.
- In coordination with municipalities, adopting land use regulations to limit development and redevelopment in areas particularly vulnerable to flooding due to sea level rise, stormwater inundation, and other impacts of climate change.
- Using a green infrastructure map series to achieve community equity in the integrated use of green infrastructure ~~as part of~~ to guide and augment community resiliency strategies, including tree canopy coverage, heat maps, water storage needs and presence of solar projects installations infrastructure, access to fresh food, etc.

### **STRATEGY CCR-3: Promote and support a sustainable funding source for countywide resilience investments.**

Evolving climate conditions contribute to escalating flood and heat risk within the Broward landscape, affecting public health and safety, housing affordability, infrastructure, services and the economy. To support timely and coordinated infrastructure improvements consistent with the recommendations of the 2025 Countywide Resilience Plan, a sustainable funding source to advance flood and heat mitigation strategies for residents,

businesses and visitors, Broward County supports a sustainable funding source to accelerate, incentivize and coordinate the requisite investments.

#### Implementation strategies include:

- Identification, support and approval of sustainable resilience funding sources.
- Advance investments in water management and drainage consistent with future conditions analyses and water storage needs.
- Promote green infrastructure countywide and as part of all new development and redevelopment projects.
- Coordinate to ensure all public investments adequately address future conditions considerations.

➔ **STRATEGY CCR-34:** Maintain adequate water supply through efficiency and conservation efforts and increase resilience of natural systems through water resource management.

Saltwater intrusion has contaminated the coastal edge of the Biscayne Aquifer that is the primary source of drinking water in Broward County. While a number of factors have contributed to the inland migration of the saltwater front, sea level rise has accelerated the rate of intrusion and is predicted to drive the front further inland in the coming decades. Saltwater intrusion is anticipated to reduce coastal wellfield capacity 40% by 2060. Broward County shall preserve, protect and enhance the sustainability of County water resources.

#### Implementation strategies include:

- Ensuring existing water resources are protected and remain available through conservation and sustainable management, especially improved surface water storage, redistribution conveyance, reclaimed water reuse and aquifer recharge.
- Preserving capacity by diversifying source alternatives, with an emphasis on the expansion of reclaimed water projects, systems, and infrastructure.
- Preserving green space and consideration of land use in areas of potential regionalization and relocation of wellfields.

- Balancing the water needs of public consumers and natural systems: by affording space for surface water storage to accommodate and conveyance of current and future conditions projected rainfall, tidal flooding, and rising sea level and groundwater level rise.
- Supporting regional water supply and conservation projects such as future phases of the C-51 reservoir project and the expansion of a countywide water reuse network.

Supporting policy and implementation guidelines for the outlined strategies are included as appropriate in Sections 2 and/or 3 of the BrowardNext - Broward County Land Use Plan, the Administrative Rules Document: BrowardNext, and, as may be appropriate, the County's Comprehensive Plan and Code of Ordinances.



## ~~WORLD-CLASS~~ NATURAL AND CULTURAL RESOURCE PROTECTION & ENHANCEMENT VISION

Broward County recognizes its unique natural resources, including its exceptional water bodies, coastlines, open spaces, flora and fauna, and historical, archaeological and paleontological resources. In appreciation of these assets and recognition of their sensitivity, the County continues to be committed to the protection, enhancement and wise use of the environment. Broward County has long maintained its priority to preserve and conserve the environment, understanding it is essential for maintaining community sustainability, as well as being an important economic generator and enhancing the safety, enjoyment and education of residents and visitors alike. As Broward County anticipates approximately 235,315,000 new residents by the year 2040<sup>50</sup>, it is vital for the County to continue to persevere in its commitment to protect and enhance its natural resources. In this light, Broward County strives, in partnership with its municipalities and other stakeholders, to be at the fore of natural resource protection and enhancement best practices, remaining dedicated to strengthening its policies and commitments in the region to protect and conserve natural resources, including the emerging importance of food systems planning.

## ➞ STRATEGY EP-1: Protect and enhance the shoreline and natural waterways of Broward County.

Tourism is vital to Broward County's economy and Broward's beaches and waterway systems lure attract millions of visitors here year after year. Beaches also protect public and private property and provide marine habitats on and along the barrier island coast. However, these beautiful beaches can be compromised by tropical storms and hurricanes, as well as by tides, wave action and natural sand flow erosion. Broward County must protect and maintain this critical environmental and economic resource through beach re-nourishment projects, the creation and enhancement of shoreline vegetation and dunes and sediment sand management plans.

### Implementation strategies include:

- Protect and restore beaches through the use of dunes and vegetation, elevated walkways and conservation easements.
- Require public access to beaches and waterways.
- Designate "Adaptation Action Areas" to identify areas vulnerable to the impacts of climate change, such as sea level rise, flooding and storm surge, and advance create adaptation mitigation strategies to reduce these risks and increase community resiliency.
- Protect and enhance sea turtle nesting areas and require the installation of compliance with regulations mandating sea turtle-friendly lighting in such areas.
- Protect and restore the County's natural ocean reef system.

## ➞ STRATEGY EP-2: Create a countywide water management/flood protection plan.

Broward County is in a unique location of the country, with the Atlantic Ocean along its entire eastern border and over 790 square miles of water conservation and recharge areas within its western limits as part of the Everglades. This unique location presents both problems challenges and opportunities in regards to water supply and management. Broward County must protect, manage and enhance its water recharge areas, surface waters, groundwaters and potable water wellfields and zones of influence, while also preparing for seasonal flooding, groundwater and sea level rise. In this regard, wWetlands

and green infrastructure can play a vital role in improving the County's water quality, and in providing natural areas for storing floodwaters and maintaining surface water flow stormwater storage and conveyance. Wetlands and green infrastructure can function as natural sponges which trap to control surface water flows and filter pollutants and slowly release water. Wetlands These areas can also function as primary fish and wildlife habitats by providing food, water and shelter for a wide variety of plant and animal species.

#### Implementation strategies include:

- Implement a recommendations of the countywide Resilience Plan with an emphasis on achieving water management needs and water storage volumes delineated by basin and across municipalities plan, in coordination with local water management plans, which includes both groundwater and surface water.
- Improve water management infrastructure consistent with countywide water resilience standards and management strategies, and coordinate system improvements in conjunction with local plans and projects.
- Preserve, enhance and create surface waters and minimize direct discharge into such bodies of water through innovative storage and pre-treatment methods technologies.
- Preserve the County's groundwater quality through the provision of pre-treatment, storage, conveyance, drainage and stormwater management systems, minimization of surface water run-off and minimization of soil erosion and prevention of saltwater intrusion.
- Consider Ensure minimum floor elevations for structures and minimum crown elevations for roads based on projected account for future conditions, including compound flood conditions consistent with the County's most current from sea level rise projections and resilience standards, at a minimum.
- Protect and revitalize the functional value of wetlands, hydric soils and vegetative communities within Broward County.

➞ STRATEGY EP-3: Preserve and protect Broward County's natural environment through County and local environmental regulatory programs and well-planned patterns of growth and development.

At the foundation of a healthy environment is an ecosystem with uncontaminated soil and pure air. Because of the clear connection between a healthy environment and the preservation of public health, safety and general welfare, Broward County established regulatory programs to protect the purity of our natural resources and to protect humans, plants and wildlife. Human activities associated with the County's tremendous growth carries the potential for the contamination of our natural environment, making the reasonable control and regulation of the activities that could threaten the quality and purity of these resources of paramount importance.

#### Implementation strategies include:

- Continue to utilize the County's Environmental Assessment and Remediation Program to ensure that contaminated sites are properly remediated and maintained under future conditions, reflective of recent modeling efforts.
- Continue to implement the County's Hazardous Materials Licensing and Compliance Assistance Program to prevent discharges of regulated hazardous materials into soil, groundwater and surface waters under current and future climate conditions.
- Continue to fulfill the goals of the County's Air Monitoring and Air Quality Program to prevent and control emissions from commercial and industrial air pollution sources through regulation and compliance assistance.
- Promote the use of alternative modes of transportation and alternative fuels to reduce carbon emissions and the negative impacts of exhaust fumes on air quality.
- Acquire, pP Protect, preserve and enhance Local Areas of Particular Concern.
- Preserve and enhance Broward County's tree canopy and encourage the use of native vegetation for all new development.
- Continue to restore the County's natural areas and eliminate invasive exotic vegetation.

➡ **STRATEGY EP-4:** Provide recreation and open space areas which serve the diverse interests of both residents and visitors and that are compatible with the tropical and resort character of Broward County.

Recreation and open space areas are a critical part of the high quality of life Broward County wants to offer to its residents. These areas not only provide places for sports and activities, which help to promote healthy lifestyles for all age groups, but also provide places for people to relax and enjoy nature, which improves their mental health as well. Open space areas also promote a sustainable environment by providing natural habitats for various species of wildlife and vegetation. The County's recreation and open space system builds a sense of place, making our community a more attractive place to live and work, thereby increasing the County's economic health. Broward County should protect and enhance its remaining recreation, open space and conservation areas to promote healthy residents, a robust economy and a sustainable environment.

### Implementation strategies include:

- Continue to require a minimum of three (3) acres of local parks and three (3) acres of regional parks for every 1,000 existing and projected permanent residents.
- Encourage the preservation of existing public and private open space areas, including golf courses.
- Provide for an interconnected, countywide system of greenways, bikeways, blueways and equestrian and nature trails.
- Identify, conserve and protect all water conservation and natural reservation areas within Broward County.

### ➡ STRATEGY EP-5: Protect Broward County's historical, archaeological and paleontological resources.

It is vitally important to realize that the protection, enhancement, and perpetuation of historic, archaeological, and paleontological resources represent are distinctive elements of Broward County's unique history. Broward County promotes and supports historic preservation through the enforcement of its historic preservation ordinance, which mandates that the County seek maintain Certified Local Government (CLG) status, including: establishing a with oversight from an historic preservation board; maintaining and updating the historic site surveys; enforcing the state and local preservation laws; and providing opportunities for public participation in historic preservation activities. The County will also pursue actions to educate and advocate for the preservation of the County's cultural, historical, archaeological and paleontological resources.

## Implementation strategies Include:

- Enhance the County's programs to identify, document, designate and protect cultural, historic, archaeological and paleontological resources.
- Promote intergovernmental coordination and cooperation between the County, its municipalities, other CLGs and state and federal agencies.
- Promote protection, adaptive reuse and conservation of historic, archaeological, and paleontological resources as a means for economic revitalization through heritage tourism development, redevelopment, and sustainable growth.

## ⇒ STRATEGY EP-6: Prioritize and support the food system planning efforts of Broward County and its municipalities.

Food system planning is the collaborative planning process of developing and implementing local and regional land use, economic development, public health and environmental goals, programs and policies to promote: sustainable agriculture and food production practices, community food security, physical and economic access to healthy food and reduction of food-related waste. It is considered an important part of sustainable and resilient development by communities around the world, and Broward County seeks to advocate food system planning throughout the region. Understanding that our population will continue to grow, it is important for Broward County and its local governments to advocate food system planning for the overall health and well-being of our communities.

## Implementation strategies include:

- Support and encourage municipalities to provide farm-to-table opportunities throughout Broward County.
- Permit urban agriculture activities in all land use categories of the BCLUP, while also ensuring that protection and promotion of rural agriculture activities remain a priority.
- Update the Best Practices for Food System Planning at least bi-annually to ensure the information is reflective of current practices and technology.

Supporting policy and implementation guidelines for the outlined strategies are included as appropriate in ~~Sections 2 and/or 3~~ of the BrowardNext - Broward County Land Use Plan, the Administrative Rules Document: BrowardNext, ~~and, as may be appropriate,~~ the County's Comprehensive Plan and Code of Ordinances.

## Resiliency Policies

### SECTION 2: POLICIES

**POLICY 2.5.4** Broward County shall strongly encourage the preservation of open space areas. Amendments to the Broward County Land Use Plan which would result in the loss of open space shall be strongly discouraged and be required to address how open space and recreation needs of the existing and projected residents of the community will be met, including how the negative impacts of the loss of open space on surrounding neighborhoods will be minimized or mitigated, inclusive of flood and urban heat implications.

**POLICY 2.5.5** Amendments to the Broward County Land Use Plan containing golf courses, including closed golf courses, shall address the following:

- a. The impact of the loss of open space on the surrounding residential areas. The loss of open space must be mitigated through provision of parks and open space to serve the surrounding neighborhood.
- b. Management of storm water retention taking into account the extent to which the golf course provided storm water retention for the surrounding development and how this will be mitigated, along with any additional storm water impacts created by the new development, consistent with future conditions standards and water storage needs identified in the Future Conditions Water Storage Map.
- c. Minimization of the impact on natural resources including wetlands, lakes, aquifer recharge areas and the tree canopy, including any historic trees on the site.
- d. Mitigation of environmental contamination. The level of environmental contamination must be determined by conducting a Phase 1 environmental assessment or equivalent assessment, as deemed acceptable by the appropriate Broward County staff. A Phase 2 environmental assessment or equivalent assessment, as deemed acceptable by the appropriate Broward County staff may be required based upon the findings of the Phase 1 or equivalent assessment.
- e. Integration of the proposed development with the surrounding areas including how the development will tie into the existing neighborhoods through roads, sidewalks, parks/open space and greenways.

**POLICY 2.5.6** Discourage private development of open, community and recreational areas on the barrier island.

**Policy 2.5.9** Broward County strongly supports the continued preservation of the Conservation – Natural Reservations and Reserve Water Supply Areas consistent with the Conservation Permitted Uses of this Plan. Amendments to the Broward County Land Use Plan which would result in the loss of these natural areas and water storage areas shall be strongly discouraged.

**POLICY 2.9.3** Broward County continues to oppose and prohibit in any land use category the use of conventional or unconventional drilling methods and the use of hydraulic or gas fracturing, acid fracturing, and any form of extreme or other well stimulation techniques, including but not limited to the practice of injecting acids, chemicals, proppants, solvents



and other aqueous and non-aqueous fluids to create fractures, fissures or other areas of increased permeability or porosity for the purposes of resource extraction.

**POLICY 2.11.5** New onsite sewage treatment and disposal systems (such as septic tank systems) shall only be permitted when the Environmental Health section of the Florida Department of Health and Rehabilitative Services or the Florida Department of Environmental Protection (FDEP) determines they are consistent with Broward County's Water, Sanitary Sewer and Septic Tank Ordinance and with the requirements of the FDEP, Florida Statutes and the Florida Administrative Code.

**POLICY 2.11.6** Local governments shall, when it is determined to be practical and financially feasible, require land uses currently on septic systems to be connected to central wastewater treatment facilities, with priority given to those land uses in proximity to surface waters.

**POLICY 2.20.1** Adopt, implement and encourage land use provisions which promote the principles of the "Smart Growth" initiative seeking to maintain and create desirable and efficient communities for Broward County residents, visitors and economic interests including quality housing for all, integrated with excellent and sufficient public facilities and services, recreational opportunities and open space areas, directed to areas with reduced flood risk, and which maximizes preservation and conservation of natural resources.

**POLICY 2.20.16** Broward County shall pursue strategies to diversify and expand clean and renewable energy sources and infrastructure in order to reduce greenhouse gas emissions within Broward County, the region and the state of Florida.

**POLICY 2.21.3** Broward County shall evaluate plan amendments within the Adaptation Action Area - Social Resilience Map and shall discourage those amendments which would contribute to additional flood or heat risk within the basin, and for adjacent properties, under current and future conditions. In review of such amendments, the County shall review for:

- a. Stormwater storage improvements that provide a net benefit to the community.
- b. Green infrastructure projects that present a net benefit to the community.
- c. Additional infrastructure improvements supporting implementation of the 2025 Countywide Resilience Plan.

**POLICY 2.21.4** Plan amendments within the Adaptation Action Area - Social Resilience Map should require a minimum of 20% of site area be dedicated to green infrastructure features, such as tree plantings, vegetated storage (swales, bioswales, stormwater planters), on-site water management systems, and alternatives to paved surfaces. If 20% green infrastructure is not feasible, the applicant or sponsoring municipality may include consideration and implementation of programs and policies involving mechanisms such as, but not limited to, impact fees, in-lieu fees, and other funding sources as appropriate to provide the required green infrastructure investments elsewhere within the sub-basin.

**POLICY 2.21.5** Broward County shall establish and maintain a Future Conditions Water Storage Map to guide redevelopment requirements for enhanced water management investments accounting for future conditions planning and consistent with the 2025 Countywide Resilience Plan.

**POLICY 2.21.6** Site development and redevelopment shall be required to provide sufficient on-site water management infrastructure to achieve enhanced water storage in accordance with the Future Conditions Water Storage Map and the established water storage allocation for the sub-basin. The applicant or sponsoring municipality may include consideration and implementation of the following:

- a. programs and policies involving mechanisms such as, but not limited to, impact fees, in-lieu fees, and other funding sources as appropriate to provide the required storage or equivalent water management improvements elsewhere within the sub-basin or to provide funding to facilitate the same;
- b. programs and policies in which the municipality facilitate the maintenance or upgrade of existing water infrastructure to improve water storage, drainage or flood control within the relevant sub-basin or other priority areas.
- c. property tax abatement programs aimed at generating revenues for resilience investments;
- d. streamlined and reduced-cost permitting procedures for resilience projects investments;
- e. use of appropriate existing public lands, or public land-banking to generate additional water storage areas.

The affected municipality shall demonstrate compliance with this Policy at the time of the County's consideration of the applicable land use plan amendment, by establishing that the municipality has implemented or ensured adoption of appropriate policy and program measures to implement the affected municipality's chosen policies, methods and programs to achieve the required additional water storage to support flood protection under predicted future conditions.

Local governments shall document and track programs and projects implemented for the purpose of enhancing sub-basin storage consistent with the Future Conditions Water Storage Map.

**POLICY 2.21.7** Broward County, affected municipalities, and other appropriate agencies shall coordinate and cooperate to implement policies, methods and programs consistent with the 2025 Countywide Resilience Plan to achieve the targeted additional water storage required throughout the County consistent with future conditions analyses.

**POLICY 2.21.38** Broward County shall update climate related policies and maps in the Land Use Plan, including the Priority Planning Areas for Sea Level Rise Map, in the Land Use Plan with best available data, every 5 years or as available, including findings of the Broward County and USGS Joint Climate Change Inundation Modeling effort and related studies,

which seeks to achieve a better understanding of the impacts of climate change and rising sea level on the County's water supplies, drainage and flood control systems.

**POLICY 2.21.510** Broward County shall, prior to approving land use plan amendments in the areas prone to flooding and/or the impacts of sea level rise, as identified on the Flood Plains, Flood Prone Areas, ~~and Coastal High Hazard Areas Map, and the Priority Planning Areas for Sea Level Rise Map and Adaptation Action Area – Social Resilience Map, respectively,~~ determine that the subsequent development will be served by and further adequate storm water management and drainage facilities consistent with the 2025 Countywide Resilience Plan, not adversely affect groundwater quality or environmentally sensitive lands and not increase saltwater intrusion or area-wide flooding.

**POLICY 2.22.1** The Broward County ~~Environmental Protection and Growth Management~~ Resilient Environment Department shall protect the functional values of wetlands within Broward County through mechanisms such as its Environmental Resource License requirements.

**POLICY 2.22.3** Broward County shall update the Generalized Wetlands Map of the Broward County Land Use Plan at least once every two years to recognize Environmental Resource Licenses issued by the Broward County ~~Environmental Protection and Growth Management Department~~ Resilient Environment Department and establishment of specific wetland mitigation areas.

**POLICY 2.24.5** In order to enhance water management, heat mitigation and community resiliency, Broward County shall support, further and incentivize the integration of "green infrastructure" into the built urban environment.

**POLICY 2.27.1** Land development codes and regulations shall require the protection, preservation and/or restoration of beaches, particularly dunes and vegetation, including dune construction, through techniques such as conservation easements, vegetation, elevated walkways, and clustering of development.

**POLICY 2.28.1** In order to protect and enhance sea turtle nesting, coastal municipalities, in coordination with the Sea Turtle Conservation Program of the Broward County ~~Environmental Protection and Growth Management~~ Resilient Environment Department, shall prepare and adopt land development regulations consistent with state and federal guidelines. Each coastal municipality shall also, through ordinance, adopt regulations to control beachfront lighting. Those regulations shall be consistent with Chapter 62B-55 (FAC) Model Ordinance for Marine Turtle Protection and they shall additionally be in compliance with Lighting/Development Categories as outlined in the Broward County Technical Report 97-06 Broward County Beach Lighting Management Plan.

**POLICY 2.29.4** Broward County's greenways and trails shall be designed with consideration for use consistent with future climate conditions, especially extreme heat, and shall be designed to include water bottle refill stations, enhanced tree canopy and cool materials.

### **SECTION 3: RECOMMENDED PRACTICES**

**POLICY 3.3.54** Encourage the restoration of Broward County's vegetative communities and hydrologic connections including those hydrologic connections to the Everglades and Big Cypress Swamp.

**POLICY 3.3.76** Support land acquisition and management practices which provide a sufficient fresh source of potable water supply, protect wildlife and natural resources, and provide public access to natural areas.

**POLICY 3.3.7** Support land acquisition for additional surface water storage area to benefit water management and flood protection.

**POLICY 3.3.8** Require reductions in impervious cover and enhanced on-site above and below ground water storage (where feasible) as part of redevelopment projects.

**POLICY 3.3.9** Establish minimum requirements and promote expansion of green infrastructure as integral to water management infrastructure.

**POLICY 3.3.10** Promote resilient design strategies focused on elevating infrastructure and accommodating landward movement of the shoreline, beaches and dunes in conjunction with redevelopment on the barrier island.

**POLICY 3.3.11** Broward County and its local governments should continue to implement the recommendations of the 1986 Study of Water Supply and Selection of Future Wellfield Sites in Broward County, as amended by the Board of County Commissioners.

**POLICY 3.3.1315** The Broward County Environmental Protection and Growth Management Resilient Environment Department and local governments should mitigate the impacts of beach renourishment projects on near shore hard bottom areas through the creation of similar near shore habitat.

**POLICY 3.4.1** Private onsite sewage treatment and disposal systems (such as septic tanks) and wells in Broward County should be phased out and replaced with centralized water and wastewater systems, where necessary, to protect the health, safety, and welfare of Broward County's residents.

**POLICY 3.4.3** The disposal of solid wastes by sanitary landfill should be environmentally sound, climate-focused, and state of the art.

**From:** [Carrie Roach](#)  
**To:** [Blake Boy, Barbara](#)  
**Subject:** Re: Public comment needed!  
**Date:** Monday, February 17, 2025 12:24:37 PM

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### External Email Warning

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Deepest Regards, Barbara,

Hoping your extended weekend is glorious.

Adding additional support for a food policy into our county's "BrowardNext" is a great responsibility but also , pleasure for me personally as this has been a lifelong passion of mine. Thank you for including community members in this 7 year plan . Thank you for reaching out with your email for support for a food policy. What a gift to know I am not alone in this insight per public record.  
Note: Michael Madfis, Susan Regev, Jaime Castoro, and Leann Barber.

I call your attention to further national support in addressing access to healthy food :

### **US HR 484 2025-2026**

**Supporting : 1. Opening new grocery stores in underserved areas (note: funds cannot be used for new construction).**

**2.. Supporting the operations of existing grocery stores.**

**Improving access to healthy food within these communities.**

### **3. Eligibility Criteria for Loans**

**States can only provide loans to entities that meet specific criteria, such as:**

**Being a grocery store or planning to become one.**

**Emphasizing healthful, unprocessed foods and providing staple foods such as fruits and vegetables.**

**Maintaining affordable prices that are at or below market value.**

**Demonstrating qualifications to operate a grocery store or having partnerships for technical assistance.**

### **4. Prioritization of Applications**

**States are encouraged to prioritize loan applications from entities that:**

**Hire local residents from the underserved community.**

**Offer classes on healthful diets.**

**Source food from local farms.**

**Have established connections with the grocery supply chain.**

### **5. Loan Administration and Repayment**

Daniel DeSoto and my US Congressional rep have co-sponsored with 37 others in Congress at this date, Feb. 17, 2025.

<https://www.congress.gov/bill/119th-congress/house-bill/484/cosponsors?q=%7B%22cosponsor-state%22%3A%22Florida%22%7D>

I ask:

Add as a policy : an intention of no more food deserts in our county.

I see this as inserted in either of these policies below but Barbara, I trust you to know best.

Thank you for your service and sharing your intelligence and moral standing to the whole of our local community.

Sincerely,

Carrie Roach

720 South Wind Circle Sunrise 33326

Resident of this address since 1985

Resident of Florida since 1957.

**POLICY 2.18.2**

By 2018, Broward County and the Broward County Planning Council shall study and recommend integrated levels of service standards for bicycle, transit, and pedestrian facilities and services within, at a minimum, designated or proposed and eligible "Activity Centers," or municipal and county approved community redevelopment areas. If a proposed development fails to meet levels of service standards for automobile roadway capacity in such areas, the proposed development may be recommended for approval if levels of service for bicycle, transit, and pedestrian facilities and services are acceptable after considering effects from the proposed development.

**POLICY 2.36.2**

The Broward County Planning Council and Broward County shall, by 2019, work with Broward County municipalities, partner agencies, stakeholders, and interested parties who make and are affected by land use policy and public infrastructure and services decisions, and issue model guidelines, methods, and tools to advance environmental justice.

ADD in either or both policy

**POLICY 2.18.2**

**POLICY 2.36.2**

: as a way to provide environmental justice, food deserts will be addressed as in HR 484

: Activity Centers to include access to local, fair, healthy fresh food

**From:** [Sesodia, Josie](#)  
**To:** [Blake Boy, Barbara](#); [Stone, Ralph](#)  
**Cc:** [Wight, Lisa](#); [Delsalle, Darby](#); [Von Stetina, Deanne](#); [Teetsel, Dawn](#)  
**Subject:** RE: BrowardNext Affordable Housing Comments  
**Date:** Tuesday, February 25, 2025 9:47:24 AM

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One of the topics I think that should be reviewed is ADUs, especially in light of [SB 184](#).  
The state definition of ADU is limited to affordable housing, should the County definition be expanded?

Jo

---

**From:** Blake Boy, Barbara <BBLAKEBOY@broward.org>  
**Sent:** Wednesday, February 19, 2025 11:17 AM  
**To:** Stone, Ralph <RSTONE@broward.org>; Sesodia, Josie <JSESODIA@broward.org>  
**Cc:** Wight, Lisa <LWIGHT@broward.org>; Delsalle, Darby <DDELSALLE@broward.org>; Von Stetina, Deanne <DVONSTETINA@broward.org>; Teetsel, Dawn <DTEETSEL@broward.org>  
**Subject:** BrowardNext Affordable Housing Comments

Good morning—

As you are aware, Planning Council staff has been requesting comments from interested parties the past several months and is working on drafting updates to the Broward County Lane Used plan based on a framework (attached) that the steering committee approved last year as well as public comments that have been received as of today.

I am looking for comments from each of your agencies specifically related to affordable housing and densification opportunities, including single residential occupancy as counting towards density, consistent with the Commission's acceptance of the Broward County Affordable Housing Master Plan last year.

I understand that the concepts are general, but I would appreciate specific updates or proposed language that could reinforce the concepts in the County plan. I have attached the affordable housing primer, which is basically the highlighted regional issue and all the policies and incentive based policies for you to offer ideas from.

I would also like to know if you have specific ideas for updated strategies in the highlighted regional issues section. The opening of the section was updated in

2022 and I didn't know if there was any other language that could be included to modernize the strategies.

I am on a tight schedule as draft language will be provided to the Planning Council Steering Committee in mid-March. Please let me know if you have any questions. Thank you for your continued support and cooperation.

Barbara

**Barbara Blake Boy, Executive Director**

115 South Andrews Avenue, Room 307

Fort Lauderdale, Florida 33301

954.357.6982 (direct) [www.broward.org/planningcouncil](http://www.broward.org/planningcouncil)

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**From:** West, Dan  
**To:** Blake Boy, Barbara  
**Subject:** FW: Affordable housing at CB Smith  
**Date:** Tuesday, February 25, 2025 1:29:23 PM  
**Attachments:** image007.png  
image012.png

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Barbara, thank you for allowing us to comment on this. The only addition I might add is the park's emergency response role in the justification. Over the years, CB Smith Park has served as a critical county wide resource during natural disasters and other emergencies, including recently as the primary COVID-19 testing, vaccination and debris management site. The regional significance as not only a high quality recreational and open space destination attraction for county residences and guests but also its adaptability and importance to our community resilience efforts.

Feel free to not include this or edit, as necessary.

Thanks again.

Dan



Erik Westberg, CRRP  
Assistant Director  
954-357-5107 • [Broward.org/Parks](http://Broward.org/Parks)  
**Recreation. Preservation. Education.**  
   

---

**From:** West, Dan <[danwest@broward.org](mailto:danwest@broward.org)>  
**Sent:** Monday, February 24, 2025 4:08 PM  
**To:** PK\_1STLINE <[PK\\_1STLINE@broward.org](mailto:PK_1STLINE@broward.org)>  
**Subject:** FW: Affordable housing at CB Smith

Please review below and provide any additional suggestions or edits to me that I can respond back to Barbara's to the Planning Council. Commissioner Castillo sits on the council.

Dan

---

**From:** Blake Boy, Barbara <[BBLAKEBOY@broward.org](mailto:BBLAKEBOY@broward.org)>  
**Sent:** Monday, February 24, 2025 4:03 PM  
**To:** West, Dan <[danwest@broward.org](mailto:danwest@broward.org)>  
**Subject:** RE: Affordable housing at CB Smith

Hi again—

This is a draft rationale to respond to the idea. Is there anything that you would suggest to strengthen the rationale? Thank you for your consideration.  
Barbara

Consider the addition of affordable housing opportunities on lands designated **Recreation and Open Space** (mimic Community Facilities permitted use and criteria up to 5 acres) or other Permitted Uses as appropriate. (No change recommended.)

**Rationale:** Upon review of the Broward County Park System and in consultation with the Broward County Parks Director, as well as the County's policies and directives related to resiliency planning, Planning Council staff does not support the addition of affordable housing opportunities on Broward County owned-lands designated Recreation and Open Space. Accessible open space and recreation opportunities are at a premium in Broward County. As the population continues to grow, additional County owned park space will primarily remain static. Although the County could consider authorizing these uses for municipal park spaces, it is Planning Council staff's opinion that this would be a challenging endeavor as many central and eastern county local governments struggle to maintain three (3) acres per existing and projected 1,000 permanent residents. The mechanism to achieve affordable housing on these lands exists in the County/local government land use plan amendment process which is transparent and avails the public of the intention. In addition, loss of open space in in conflict with and must be addressed via BCLUP Policy 2.5.4.

Planning Council staff has prepared a graphic of the BCLUP land use designations that permit residential uses by right or per criteria. In review of that information, Planning Council staff does not recommend the expansion of permitted uses of additional land use designations, but does support the expansion within existing permissible categories.

Barbara Blake Boy, Executive Director  
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**From:** Blake Boy, Barbara  
**Sent:** Monday, February 24, 2025 3:45 PM  
**To:** West, Dan <[danwest@broward.org](mailto:danwest@broward.org)>  
**Subject:** RE: Affordable housing at CB Smith

Thank you and thank you for calling.

Barbara Blake Boy, Executive Director  
115 South Andrews Avenue, Room 307  
Fort Lauderdale, Florida 33301  
954.357.6982 (direct) [www.broward.org/planningcouncil](http://www.broward.org/planningcouncil)

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**From:** West, Dan <[danwest@broward.org](mailto:danwest@broward.org)>  
**Sent:** Monday, February 24, 2025 3:33 PM  
**To:** Blake Boy, Barbara <[BBBLAKEBOY@broward.org](mailto:BBBLAKEBOY@broward.org)>  
**Subject:** FW: Affordable housing at CB Smith

Fyi, thanks so much for sharing

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**From:** West, Dan  
**Sent:** Thursday, February 13, 2025 3:35 PM  
**To:** Campbell, Kimm <[KCAMPBELL@broward.org](mailto:KCAMPBELL@broward.org)>  
**Cc:** Jean, Laurette <[LJFAN@broward.org](mailto:LJFAN@broward.org)>  
**Subject:** RE: Affordable housing at CB Smith

Kimm,

First, attached is the spreadsheet for all municipal and county parks in Pembroke Pines, including acreage and address location. This spreadsheet includes CB Smith Park the only county park within Pembroke Pines and Eagle Nest Conserved Area they mentioned for a potential swap. There is a total of 1503 acres of city and county owned parkland. From our understanding, Eagles Nest is not a dedicated park and would not serve all county residents because the U.S. Fish and Wildlife restrictions prohibit any visitors within a specified distance of an eagle's nest, so it would not serve the public's recreational needs. It also does not have any infrastructure, so the costs for us to maintain and improve this remote park, including removal of the exotics will be significant for the county.

#### BACKGROUND

The mission of Broward County Parks and Recreation is to provide Recreation – Preservation – Education to the residents and visitors of County. Broward County-managed parks are for everyone and are supported by County tax dollars to inclusively benefit all guests that live in the county. C.B. Smith Park is the fifth largest regional park in the Parks and Recreation Division system. Its annual attendance figures, however, belie the assumption that bigger parks are more popular. Attendance to date at C.B. Smith Park in FY25 is 303,231. In FY24, it was more than 861,000, an increase of more than 17% over FY23, and is the second most visited park in the system. Additionally, these figures do not include visitors to All Golf, which welcomed approximately 140,000 guests in FY24 alone.

Our parks are partners in public health, providing free and low-cost spaces to be physically active; connect with nature to improve mental health and well-being; mitigate climate, air, and water pollution impacts; and bring communities together to provide social benefits for everyone in the county, not just one municipality.

#### C.B. Smith Park provides:

- A central location within Broward for residents from Broward and Miami-Dade, as well as to the seniors living at Century Village and visitors to and employees of Memorial West Hospital.
- The Lakeside RV campground has 83 full hook-up sites that are reserved by visitors across North America.
- Paradise Cove is the system's largest and most popular water park.
- The Concert Green with a recently renovated open-air amphitheater (capacity 5,000) for large-scale events.
- All Golf Center, a public/private partnership that offers a driving range, batting cages, miniature golf, and a pro shop.
- Safety Town, a children's program of Joe DiMaggio Children's Hospital.
- Bike and walking paths.

#### REASONS WE CAN NOT DO THE PARCEL EXCHANGE

- It goes against the Charter of Broward County, Section 8.13 Broward County Park Preservation, A(2). "Park Purposes" shall mean the use of an area of land in the pursuit of outdoor leisure, athletic, or recreational activities and facilities ancillary thereto including, but not limited to, cultural, educational, and civic facilities, animal exhibits, habitats, band shells, pavilions, outdoor classrooms, and concessions," and this parcel exchange doesn't serve a park purpose as stated above.
- The Declaration of Restrictive Covenants prohibits use of the site to provide housing (See Attached).
- The County-wide Park system only has approximately 6,500 acres of which 3,500 acres are natural areas. The remaining 3,000 acres are for recreational purposes while the City's Parks own system has approximately 759 acres out of a total of 1,200 acres for recreational purposes. It does not make sense to pull from the County's critically limited Regional Park acreage to fill this non-recreational City need.
- Use of the site for the County's Emergency Response, i.e., during the COVID-19 pandemic when the park served as a testing and vaccination site for the State of Florida Department of Health, as well as debris site after storms in the northeast corner of the park.
- The Master Plan recommended that we seriously consider the future expansion of Paradise Cove water park with relocation to the north of the campgrounds with parking in the northwest quadrant. This site was also being considered in the future as an expansion of the campground which is rapidly becoming a very popular for residents and guests and is an economic revenue producer for the park system and local businesses.
- According to an article published on [Local10.com](http://Local10.com) on April 7, 2022, the commission changed the zoning of the Eagle Preserve parcel from residential property to a nature preserve with a unanimous vote.
- The suggested parcel, now considered a nature preserve, contains invasives – Australian pines and melaleuca – and two protected Bald Eagles, which would limit public access and is not zoned for diverse recreational opportunities.
- There is no mention of the preserve in the Citywide Parks Master Plan published in 2023 and it is not listed as a nature preserve on the City's Park Website.

As we previously discussed with them several years ago, if the areas outlined below in red are what they are considering now, this would be a poor location as it would take away our critical access to the area north of the campground which is currently utilized for large special events and the area north of All-Golf is used for parking vehicles. During gray skies, the site is also the designated debris management areas as identified in our Emergency Plan.

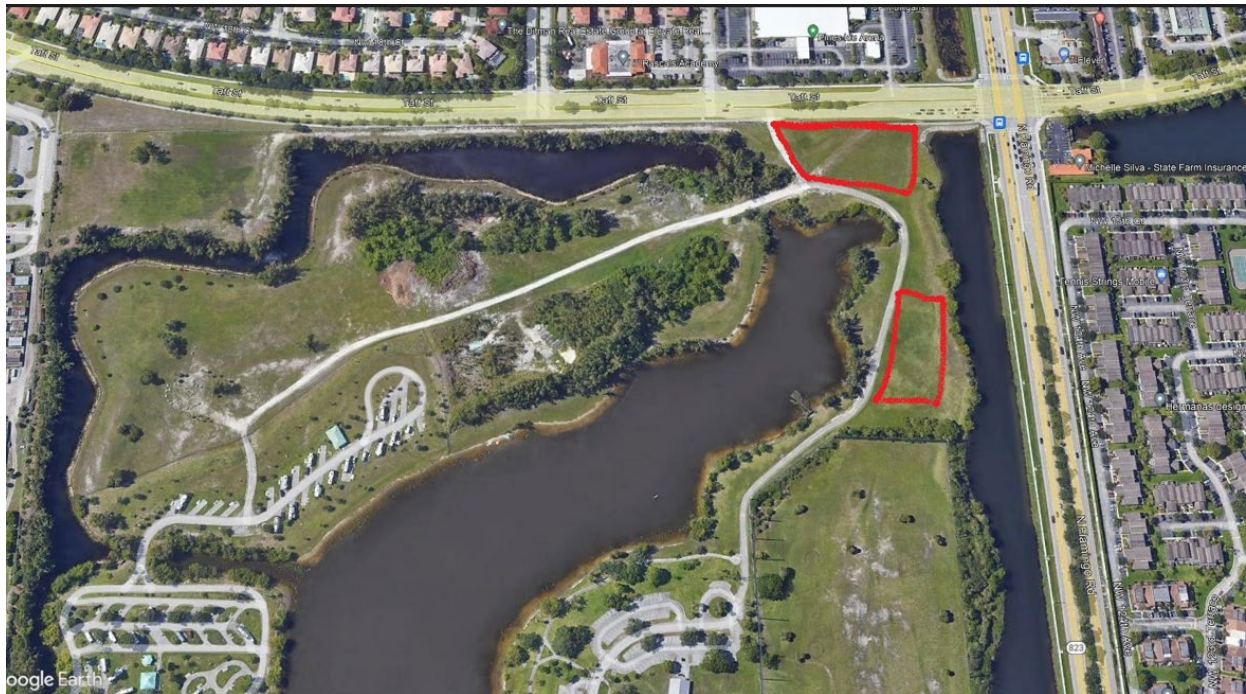
Although, we certainly realize the crucial need for affordable housing, removing land from a regional park sets a very dangerous precedent for the county park system. Access to and from this location would need to come from the Taft Street entrance and since Taft Street is one of the major roadways to get to and from Flanigan High School and Walter C. Young Middle School, the traffic congestion for us and the public would be challenging to say the least, especially when we are hosting larger events. There would also be additional logistical and operational issues for us to absorb because we would be carving out an area for a neighborhood inside the park that would require additional gates, fencing and security systems.

It's no secret that Broward County Parks and Recreation Division have one of the lowest ratios of accessible dedicated park lands vs # of residence in the entire country, especially considering the size and population of the county. Only 6500 acres in our entire system. We are already a critically land-poor park system and the few regional parks we have provide residences and guests easy and safe access to recreation areas within a ten to fifteen

minutes' drive from home. Although three quarters of the sawgrass is conservation lands, much of it is inaccessible to most Broward County residences. According to a study performed by Parks Environmental Management Group, the County's publicly accessible park land stands at 3,972 acres. Additionally, according to United States Census Bureau data and the County's annual growth rate of 0.99% (WorldPopulationReview.com), Broward's population is projected to exceed 2 million residents by 2026, creating the need for regional level parks at 6,000 acres. With 3,972 acres of publicly accessible regional park land, less than 2 acres are available per 1,000 residents, falling well short of the Land Use Plan's minimum standard. This was one of many reasons why the Park Charter and Deed of Restrictive Covenants were approved by the Board of Commissioners due to increasing urban sprawl, insufficient availability of county park lands and pressures by local cities, developers, and others to develop the very few acres we have left for public enjoyment for current and future generations. County regional parks are for everyone no matter where they live in the county, taxpayers who are all county residents and visitors paid for these parks and the intention was not to allow one community to divert the use of a county park intentionally or unintentionally for their own advantage (s). In summary, County Park systems fill the needs that are generally unmet by local municipalities and park visitors are treated equally whether they live in the city or not. We do not have residence requirements or charge differential fees depending on where you live. In conclusion, giving in now and taking open space from one of our most popular regional parks that serve almost a million visitors annually will have highly undesirable consequences for generations to come.

Please let me know if you need any further information. Thank you for allowing us to provide our comments.

Dan



**From:** Campbell, Kimm <[KICAMPBELL@broward.org](mailto:KICAMPBELL@broward.org)>  
**Sent:** Wednesday, February 12, 2025 3:08 PM  
**To:** West, Dan <[danwest@broward.org](mailto:danwest@broward.org)>  
**Cc:** Jean, Laurette <[LJEAN@broward.org](mailto:LJEAN@broward.org)>  
**Subject:** Affordable housing at CB Smith

Hey there. You will recall that a few years back Angelo Castillo proposed a land swap with Pembroke Pines so they could build affordable housing at the corner of flamingo and Taft. We declined the offer last time and it's re-emerging now. They swap they want to make us the Eagle preserve in a melaleuca forest/ nature preserve. Please send me whatever you have on it including why we said no ASAP.

Dr. Kimm R. Campbell, DSW, LCSW  
Deputy County Administrator  
Broward County

Message sent from iPhone. Please excuse typos.

**From:** [Delsalle, Darby](#)  
**To:** [Blake Boy, Barbara](#)  
**Cc:** [Sesodia, Josie](#); [Cunniff, Heather](#)  
**Subject:** RE: I have a thought on what to do with these policies...give me a call whenever you have a chance  
**Date:** Thursday, March 6, 2025 11:09:53 AM  
**Attachments:** [image003.png](#)

---

Barbara,

I believe we should hold off on any policy changes to transportation concurrency and impact fees until after the Mobility Fee study is concluded and the Board provides direction. This will likely not be till the end of this year or early next.

Regards,

Darby



**DARBY P. DELSALLE, AICP, ASSISTANT DIRECTOR**

Resilient Environment Department

**URBAN PLANNING DIVISION**

1 North University Drive, Box 102, Plantation, Florida 33324

[ddelsalle@broward.org](mailto:ddelsalle@broward.org) | 954.357.9792

<http://www.broward.org/Planning>

---

**From:** Blake Boy, Barbara <BBLAKEBOY@broward.org>  
**Sent:** Wednesday, March 5, 2025 2:04 PM  
**To:** Delsalle, Darby <DDELSALLE@broward.org>  
**Subject:** I have a thought on what to do with these policies...give me a call whenever you have a chance

### ***TRANSPORTATION CONCURRENCY AND IMPACT FEES***

**POLICY 2.14.1** Broward County will continue, through the criteria established within the Broward County Land Development Code, to provide a transportation concurrency fee credit for new development located in proximity to transit stops.

**POLICY 2.14.3** Prior to plat or site plan approval, whichever occurs first, Broward County and/or the appropriate local government shall ensure that the

public facilities and services necessary to meet the level of service standards established within the Broward County Comprehensive Plan and affected municipal comprehensive plan will be available to serve new development.

**POLICY 2.14.4** In order to ensure that land development contributes a proportionate share of the cost of public facilities and services, Broward County shall continue to implement the improvement, dedication and impact fee requirements contained within the Broward County Land Development Code, as amended.

**POLICY 2.14.5** For those portions of the regional roadway network within their respective jurisdictions, local governments within Broward County shall adopt levels of service and concurrency management systems consistent with the Broward County Transportation Element.

**POLICY 2.14.8** No municipal government shall accept a building permit application, nor issue a building permit, unless the applicant presents evidence from Broward County either that the impact of the proposed development on the regional transportation network has been mitigated by payment of road impact fees or transit impact fees, based on the appropriate provisions of the Broward County Land Development Code, or that no such payment is due. The County Commission may adopt land development regulations which exempt from this requirement categories of building permits that clearly do not create additional transportation impacts.

**Barbara Blake Boy, Executive Director**

115 South Andrews Avenue, Room 307

Fort Lauderdale, Florida 33301

954.357.6982 (direct) [www.broward.org/planningcouncil](http://www.broward.org/planningcouncil)

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The Planning Council offices are open Monday through Friday. I am in the office every Monday through Thursday from 7:00 a.m. to 5:00 p.m.



Resilient Environment Department

**URBAN PLANNING DIVISION**

1 N. University Drive, Box 102 | Plantation, FL 33324 | 954-357-6634 | Fax 954-357-6521

**DATE:** March 17, 2025

**TO:** Barbara Blake Boy, Executive Director  
Broward County Planning Council

**FROM:** Darby Delsalle, AICP, Assistant Director  
Urban Planning Division

**SUBJECT: Administrative Rules/Broward County Land Use Plan Comments**

Attached are the Urban Planning Division's comments that address the following:

- I. Environmentally Sensitive Lands Map,
- II. Housing Affordability Vision,
- III. Residential Policies,
- IV. Commerce Policies,
- V. Parks/Conservation Policies,
- VI. Compatibility Policies,
- VII. Platting and Land Development Code Policies,
- VIII. Public School Concurrency Policies,
- IX. Affordable Housing Policies,
- X. Smart Growth Policies,
- XI. Affordable Housing-Definitions,
- XII. Affordable Housing-Permitted Uses,
- XIII. Broward Next Administrative Rules Document, Sections 5.2, 5.3, 5.4, and 5.5.

If you have any questions, please contact me at 954-357-9792 or [ddelsalle@broward.org](mailto:ddelsalle@broward.org).

Attachments (1)

cc: Josie P. Sesodia, AICP, Director  
Heather E. Cunniff, AICP, Planner Section Supervisor



## Urban Planning Division Comments

March 14, 2025

**Please note:** The changes reflected below are combined with initial suggestions previously provided by Planning Council Staff.

### I. Environmentally Sensitive Lands Map

The Environmentally Sensitive Lands Map is out-of-date and should be reviewed and parcels that have been fully developed or reflect changed environmental conditions should be considered for removal.

### II. Affordable Housing Vision

Broward County includes a wide range of housing types, from large lot single family “estates” to multi-family high rise towers. Although the Broward County Land Use Plan accommodates a wide range of residential density, the availability of affordability of housing for large segments of our population has become increasingly difficult to provide. ~~The challenge of The scarcity of housing affordability housing became evident came to be recognized as a crisis during the County’s housing “bubble” between 2003 and 2007. The “bubble” resulted in~~ During this time, housing costs rapidly escalated housing appreciation and created a severe lack shortage of affordable housing ~~affordable. to those in moderate to lower income ranges~~ While people in lower income groups have historically struggled to afford adequate housing, the rapid escalation of housing costs expanded this struggle to moderate income people. Since that time, the housing supply and affordability problem has amplified. ~~have become an even more significant problem.~~ The 2022 Broward County Affordable Housing Needs Assessment found the following:

- ~~that~~ Over 150,000 renter households in Broward County are cost-burdened, meaning they pay in excess of 30 percent of their incomes on housing costs.
- Many renters and owners are severely cost burdened due to paying greater than 50 percent of their incomes on housing costs. ~~The Study further revealed that~~
- ~~Only 8 percent of all households in the County are able to~~ can afford to purchase a the median priced home.
- ~~The Needs Assessment also found that the~~ majority (54 percent) of Broward County’s workers are employed in lower wage service sector occupations at wages equivalent to 40 to 60 percent of the median household income.
- ~~Currently Compared with similarly sized county’s in Florida,~~ Broward County is the lowest ranked, county in the State of Florida for affordable housing for this population with fewer than 25 units available for every 100 households.

~~In this light, t~~ The County is committed to implements a variety of policies and programs to maximize affordable housing opportunities. for persons and households of moderate to lower incomes. Such policies and programs include local and state funding sources, bonus market rate units in exchange for supplying affordable housing units, and modern construction techniques. While these practices do help provide affordable housing, they pose the following challenges:

## Urban Planning Division Comments

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- Delivery of such housing is slow;
- Housing location may or may not be conducive to the economic stability of its inhabitants; and,
- Required agreements are labor intensive, their implementation uncertain, and information is not readily accessible for the public to locate units that are available.

Broward County will continue to seek ways to alleviate affordable housing supply challenges and implement current affordable housing policies and programs.

### III. Residential Policies

#### SECTION 2: POLICIES

\*\*\*

##### POLICY 2.2.5

- A. A studio housing unit or efficiency housing unit, no greater than 500 square feet in size may be counted by the local government as 0.5 dwelling units for residential density calculations.
- B. Alternative housing types such as student or adaptive dwelling units that accommodate a multitude of living scenarios such as multiple single individuals may be counted by the local government as a single dwelling unit for residential density calculations up to four (4) sleeping rooms per kitchen and shared living space regardless of the number of bathrooms.
- C. Single room occupancy (SRO) units may be calculated by the local governments as 0.25 dwelling units for residential density.

### IV. Commerce Policies

~~POLICY 2.3.4 Local certified land use plans governments may decrease by 20 percent the lands designated "Commerce" or similar designation on the Broward County Land Use Plan Map its local certified land use plan map for residential use in accordance with the rules established within Article 3.5(A)(1) of the "Administrative Rules Document: Broward County Land Use Plan" and the Chapter 163, Florida Statutes plan adoption and amendment process.~~

### V. Parks/Conservation Policies

**POLICY 2.5.5** Amendments to the Broward County Land Use Plan containing golf courses, including closed golf courses, shall address the following:

\*\*\*



## Urban Planning Division Comments

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d. Mitigation of environmental contamination. The level of environmental contamination must be determined by conducting a Phase 1 environmental assessment. A Phase 2 environmental assessment may be required based upon the findings of the Phase 1 assessment or equivalent assessment, as deemed acceptable by the appropriate Broward County staff.

### VI. Compatibility Policies

**POLICY 2.10.1.** Allocations of “Flexibility Units” ~~and “Redevelopment Units”~~ shall be subject to the following restriction: Within areas east of the Intracoastal Waterway, in no instance shall allocations of “Flexibility Units” ~~or “Redevelopment Units”~~ result in a residential density greater than twenty five (25) dwelling units per gross acre for the residentially designated parcel or portion of a nonresidentially designated parcel to be developed with residential use, or exceed one hundred percent (100%) of the maximum number of dwelling units indicated for the parcel by the local land use plan map, whichever resulting residential density is less.

### VII. Platting and Land Development Code Policies

**Policy 2.13.4:** When a development application is proposed on a plat, which has two or more future land use designations on the Broward County Land Use Plan, the uses may be located anywhere within the boundaries of the plat, provided the uses are consistent with density, intensity, and permitted use requirements of the Broward County Land Use Plan.

### VIII. Public School Concurrency Policies

**POLICY 2.15.6** Broward County and its local governments continue to encourage the School Board of Broward County to exempt school impact fees for affordable dwelling units without a maximum as permitted by Florida Statute

\*\*\*

**POLICY 2.15.6** Broward County and its local governments continue to encourage the School Board of Broward County to exempt school impact fees for affordable dwelling units without a maximum as permitted by Florida Statute.

### IX. Affordable Housing Policies

#### **POLICY 2.16.3**

\*\*\*

(4) The total number of units, including affordable and bonus units, on lands designated as “Residential” below 16 dwelling units per acre may not exceed a maximum of 50 dwelling units per acre on the Broward County Land Use Plan and those lands designated “Residential” 16 dwelling units per acre and above may not exceed a maximum of 75 dwelling units per acre on

## Urban Planning Division Comments

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the Broward County Land Use Plan. When at least 15 percent of the units are affordable with a minimum of 12 percent at the moderate-income level and a minimum of 3 percent at the low- and/or very-low income levels, these maximum densities shall not apply for lands designated "Residential" 16 dwelling units per acre and above, excluding dashed-line areas. For parcels designated "Commerce" or similar designation on the local land use plan map, these maximum densities shall not be applicable. If the total density, including the affordable and bonus units, exceeds the density permitted by the existing zoning classification, the governing body of the local government shall make a finding of compatibility with existing and future land uses and its local land development regulations at a publicly noticed meeting, consistent with its notification requirements; otherwise, the local planning agency of the local government may make the finding of compatibility at a publicly noticed meeting, consistent with the above.

(5) At the time of allocation of bonus density, the applicable local government must make a finding of compatibility with existing and future land uses, and that adequate public facilities and services are in place or will be in place with completion of project construction, to accommodate all bonus and affordable units.

\*\*\*

**POLICY 2.16.4** Within parcels located west of and including US 1\* that are designated "Commerce" on the Broward County Land Use Plan and are either, (1) fronting with direct access to a roadway classified as a State road, County arterial, per the Broward Highway Functional Classification map, or other road or portion thereof, as approved by the Board of County Commissioners ("Board"), herein after referred to as a "Qualified Road," or (2) are located no more than one-half (1/2) mile from a passenger rail station, defined as a station for the transportation of passengers by rail on board trains, locomotives, rail cars, or rail equipment pursuant to a passenger rail service provided by a governmental or non-governmental entity ("Qualified Rail Station"); or (3) are within a parcel designated "Activity Center," multi-family residential use is permitted in addition to that permitted otherwise in those designations by this Plan, subject to the following:

\*\*\*

(3) Single-family dwelling units are not permitted. ~~Residential units shall not be permitted on the ground floor portion of any building that fronts a Qualified Road.~~ As per Policy 2.2.5 of the Broward County Land Use Plan, studio or efficiency housing units, no greater than 500 square feet in size, may be counted by the local government as 0.5 dwelling units for residential density purposes.

\*\*\*

(5) Within a development containing residential units, the following shall apply:

(a) Office and commercial use may either be vertically or horizontally integrated providing the following:

## Urban Planning Division Comments

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1. At least fifty percent (50%) of the ground floor of any portion of a building or development, excluding ingress and egress and other ground floor development requirements (mechanical/plumbing rooms, trash rooms, fire apparatus, lobbies, etc.), facing a Qualified Road shall provide office and/or commercial uses;
  2. Portions of a development not facing a Qualified Road within an Activity Center is not required, but encouraged, to provide for office and/or commercial uses.
- (b) On parcels fronting a qualified road, greater than five (5) acres, a minimum of three ~~ten~~ percent (31~~10~~%) of the gross floor area, excluding parking garages, must be reserved or utilized for office and/or commercial uses not ancillary to the residential units.

\*\*\*

~~(9) In addition to the provisions of this Policy, parcels designated "Commerce" and meeting the location, frontage, and access requirements of this Policy or within an Activity Center, where the residential development will be located within ¼ mile of a State road, County arterial, or other road or portion thereof, as approved by Board of County Commissioners ("Board"), the Board shall consider the following in the review of funding applications submitted by local governments for future public infrastructure and economic development projects:~~

- ~~(a) Local government adoption of this Policy into the municipal Comprehensive Plan;~~
- ~~(b) Local government adoption of specific regulations, in the municipal zoning and/or land development code, to allow allocation of additional residential density units as a permitted use, by right, within specific zoning district(s);~~
- ~~(c) Local government adoption of specific regulations to implement the provisions and criteria of this Policy, including:~~
  - ~~1. Establishment of a minimum net residential density of twenty five (25) dwelling units per acre;~~
  - ~~2. Where a building is located within 100 feet of any parcel which prohibits, through the applicable zoning regulations, residential development of ten (10) dwelling units per gross acre or more, the local government may establish a maximum building height limit of not less than five (5) stories; and~~
  - ~~3. The zoning regulations that establish reduced on-site parking to accommodate the mixed uses.~~
- ~~(d) The Urban Planning Division, in consultation with the Office of the County Attorney, must certify that all the foregoing requirements of this Section (9) have been satisfied.~~

\*\*\*

\* includes all parcels that front and have direct access to US 1 and, at the option of the applicable municipality as a permitted or special exception use, on parcels east of US 1

## Urban Planning Division Comments

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and west of the Intracoastal Waterway, provided the municipality makes a finding that the additional dwelling units on said parcels will not negatively impact hurricane evacuation clearance times and/or emergency shelter capacities. ~~A local government is not required to apply this Policy to properties east of US 1 in order to be eligible for funding consideration by the Board of County Commissioners pursuant to Section (9) herein.~~

\*\*\*

**POLICY 2.16.5:** Suggest the following language change:

Within parcels located west of and including US 1 and designated “Community” on the Broward County Land Use Plan, dwelling units may be permitted subject to the following:

- (1) The parcel is ~~and will remain~~ publicly owned by a municipality and within its jurisdiction or is ~~and will remain~~ publicly owned by the Broward County Board of County Commissioners or School Board of Broward County, or the parcel is owned by an on-site or off-site community facility use, such as a religious institution, with direct access to city, county or state roads as defined by the Broward County Road Jurisdiction map;

\*\*\*

**POLICY 2.16.6** Broward County and its local governments are encouraged to promote mixed-income development to optimize the economic sustainability of its residents and affordable housing supply.

\*\*\*

### X. Smart Growth Policies

**POLICY 2.20.18** In an effort to promote sustainable communities with a variety of housing options, the Broward County Land Use Plan shall encourage Broward County and its local governments to consider adaptive reuse of underutilized non-residential uses, such as office, retail and hotel uses to residential uses, where such adaptive reuse is in proximity to supportive services for residential uses, such as transit, healthy food, schools, employment, etc.

\*\*\*

### XI. Affordable Housing - Definitions

#### SECTION 2: DEFINITIONS

ASSISTED LIVING FACILITY - Any building or buildings, section or distinct part of a building, private home, boarding home, home for the aged, or other residential facility, regardless of whether operated for profit, that through its ownership or management provides housing, meals, and one (1) or more personal services for a period exceeding twenty-four (24) hours to fifteen (15) or

## Urban Planning Division Comments

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more adults who are not relatives of the owner or administrator. Facilities with a licensed capacity of fewer than fifteen (15) adults who are not relatives of the owner or administrator shall be considered a Community Residential Home, as defined below.

COMMUNITY RESIDENTIAL HOME - Shall have the same meaning as a “community residential home” defined in Section 419.001, Florida Statutes, as may be amended.

COMMUNITY RESIDENTIAL ONE-FAMILY DWELLING: A detached dwelling unit licensed to serve six (6) or fewer unrelated residents and that otherwise meets the definition of a Community Residential Home. A Community Residential One-Family Dwelling shall be deemed a one-family dwelling unit and a noncommercial, residential use for the purposes of local laws and ordinances.

~~GROUP HOME – means a facility which provides a living environment for unrelated residents who operate as the functional equivalent of a family, including such supervision and care as may be necessary to meet the physical, emotional and social needs of the residents. Adult Congregate Living Facilities comparable in size to group homes are included in this definition. It shall not include rooming or boarding homes, clubs, fraternities, sororities, monasteries or convents, hotels, residential treatment facilities, nursing homes, or emergency shelters.~~

NURSING HOME - Any facility that provides nursing services as defined in Part I of Chapter 464, Florida Statutes, as may be amended, and is licensed pursuant to state law.

SINGLE ROOM OCCUPANCY (SRO): A living situation in which a rented room is equipped with its own lock, which is accessed through a common area or hallway, with access to a shared kitchen. SRO dwelling units may be calculated by the local governments as 0.25 dwelling units for residential density.

\*\*\*

## **XII. Affordable Housing – Permitted Uses**

### **SECTION 2: PERMITTED USES**

\*\*\*

#### **AGRICULTURAL USE**

Agricultural areas are designated on the Future Broward County Land Use Plan Map (Series) to promote agriculture and agricultural related uses. Residential development may occur within specific limits.

\*\*\*

9. Special Residential Facility Categories 1 and 2 ~~Category (1) and (2), subject to the requirements of this land use category for the location of one (1) dwelling unit as defined in the Definition section and as further provided for in the Special Residential Facilities subsection of the Broward~~

## Urban Planning Division Comments

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County Land Use Plan, are permitted subject to each facility type be allocated Residential Flexibility reflective of the Density Provision of that subsection.

\*\*\*

### COMMERCE USE

The areas designated for commerce use on the Future Broward County Land Use Plan Map (Series), provide land area for commercial, employment center, industrial and office park enterprises which support the resident and tourist populations of Broward County. Accordingly, municipal land use designations that are under the umbrella of commerce include Commercial, Employment Center, Industrial and Office Park.

\*\*\*

13. Special Residential Facilities Category (1), (2) and (3) as defined in the Definition section and as further provided for in the Special Residential Facilities Permitted Uses subsection of the Plan Implementation Requirements section of the Broward County Land Use Plan, are permitted subject to each facility type be allocated Residential Flexibility reflective of the Density Provision of that subsection.

~~a. — Special Residential Facility Category A (1) development shall be subject to the allocation of one (1) flexibility or redevelopment unit in accordance with the provisions and policies as contained in the “Administrative Rules Document: Broward County Land Use Plan.”~~

~~b. — Special Residential Facility Category B (2) development shall be subject to the allocation of two (2) flexibility or redevelopment units in accordance with provisions and policies as contained in the “Administrative Rules Document: Broward County Land Use Plan.”~~

~~c. — Special Residential Facility Category (3) development shall be subject to the allocation of flexibility or redevelopment units in accordance with the provisions and policies as contained in the “Administrative Rules Document: Broward County Land Use Plan”; each flexibility or redevelopment unit shall permit two (2) sleeping rooms regardless of the number of kitchens or baths.~~

\*\*\*

### COMMUNITY USE

The areas designated for community use on the Future Broward County Land Use Plan Map (Series), ensure the availability of land necessary to provide for a full range of regional and community facilities and utilities to meet the current and future needs of Broward County. Municipal land use designations that are under the umbrella of community use include Community Facilities and Utilities.

\*\*\*

## Urban Planning Division Comments

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6. Special Residential Facilities Category (1), (2) and (3) as defined in the Special Residential Facilities Permitted Uses subsection of the Plan Implementation Requirements section of the Broward County Land Use Plan.

\*\*\*

### RESIDENTIAL USE

The areas designated for residential use on the Future Broward County Land Use Map (Series) are intended primarily for dwellings, but other land uses related to a residential environment, including neighborhood shopping centers, neighborhood parks and schools may also be appropriate therein.

The permitted uses in areas designated residential are as follows, as deemed appropriate by the local jurisdiction:

1. Dwelling units, subject to the density limits for a parcel as designated on the Future Broward County Land Use Plan Map (Series) or certified local land use plan map and as explained in the following subsection entitled "Residential Density."

Accessory dwelling units are permitted in single-family residential areas ~~per and subject to Florida Statutes Chapter 163.31771.~~

\*\*\*

9. Offices and/or neighborhood retail sales of merchandise or services, subject to the following:

f. Regardless of the constraints above, parcels up to 10 acres designated for Medium-High (25) Residential or higher density may include the horizontal integration of offices and/or retail sales of merchandise or services, as long as no more than 50% of the parcel area is used for said purposes.

\*\*\*

11. ~~Special Residential Facilities; subject to: meeting one of the Category definitions, as further described in the Definitions Section, and as contained in~~ provided by the Special Residential Facilities Permitted Uses subsection of the Plan Implementation Requirements section of the Broward County Land Use Plan; ~~meeting density provisions as provided therein by Category type stated below;~~ and the limitations as expressed by the certified land use plan map; and if applicable, the provisions regarding the use and allocation of redevelopment units, flexibility units or bonus sleeping rooms as contained in the "Administrative Rules Document: Broward County Land Use Plan."

~~Density Provisions:~~

## Urban Planning Division Comments

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- ~~a. Special Residential Facility Category (1) development shall count as one (1) dwelling unit each.~~
- ~~b. Special Residential Facility Category (2) development shall count as two (2) dwelling units each.~~
- ~~c. Special Residential Facility Category (3) development shall count as one (1) dwelling unit per every two (2) sleeping rooms regardless of the number of kitchens or baths.~~

\*\*\*

### Residential Density

#### a. Density Standards

\*\*\*

Other land use categories and land uses are subject to density standards as follows:

\*\*\*

- Special Residential Facilities are subject to the density standards contained within applicable land use categories in the Permitted Uses subsection of the Plan Implementation Requirements section of this plan as further described by the Density Provision of the Special Residential Facilities Permitted Uses subsection of the Plan Implementation Requirements section of the Broward County Land Use Plan.

\*\*\*

- Accessory dwelling units permitted in single-family residential areas ~~per and subject to Florida Statutes Chapter 163.31771 and~~ shall not be included in density calculations. Local governments shall report to the Planning Council the number of accessory dwelling units granted building permits on an annual basis.

\*\*\*

#### d. Dashed-Line Areas

Selected Developments of Regional Impact, planned unit developments and partially completed large scale developments, are identified on the Future Broward County Land Use Plan Map (Series) by dashed lines circumscribing their edges. In the modern era, dashed-line areas may be appropriate for redevelopment areas that are less than 50 acres to facilitate redevelopment opportunities that may be best suited for a limited mix of uses that have access to transit and offers multi-modal opportunities on a less intense scale



## Urban Planning Division Comments

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than is encouraged in Activity Centers. For each of these areas, the maximum overall density in dwelling units per acre is the number which appears in the circle inside the dashed line. That number can be multiplied by the number of acres inside the dashed line, including areas not designated for residential use, to ascertain the maximum number of dwelling units allowable within the dashed line. The dwelling units that are permitted within areas circumscribed by a dashed line may only be applied within the boundaries of the circumscribed area and may not be transferred. Additional dashed-line areas may be designated on the Future Broward County Land Use Plan Map (Series) through amendments to the plan consistent with the provisions of this section.

### e. ~~Redevelopment in Coastal High Hazard Area~~

Local certified land use plans may permit the redevelopment of residentially designated areas, including existing hotel uses, ~~located within the coastal high hazard area~~ which were subject to past decreases in density resulting from the adoption of the 1977 or 1989 Broward County Land Use Plan. Such redevelopment shall be limited to the actual built density/intensity (number of dwelling units and building square footage) and meet all public safety codes in effect at the time of redevelopment including applicable building code, flood elevation and hurricane evacuation standards. ~~Building square footage may be increased by one percent for every two percent reduction in the number of dwelling units, subject to local land development regulations addressing building bulk, shadow and form. Local certified land use plans shall also comply with the natural resource protection policies addressing the protection of beaches, rivers and marine resources enumerated within the Broward County Land Use Plan.~~

\*\*\*

## RURAL ESTATES

\*\*\*

The permitted uses in areas designated rural estates are as follows, as deemed appropriate by the local jurisdiction:

\*\*\*

### 7. Special Residential Facility Category 1.

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## RURAL RANCHES

\*\*\*

## Urban Planning Division Comments

March 14, 2025

The permitted uses in areas designated rural ranches are as follows, as deemed appropriate by the local jurisdiction:

\*\*\*

### 8. Special Residential Facility Category 1.

\*\*\*

#### **SPECIAL RESIDENTIAL FACILITIES**

This Subsection implements Chapters 419 and 429, Florida Statutes, and only applies to those facilities licensed by the State of Florida. These uses, as further described in the Definitions Section, consist of the following categories:

1. Community Residential One-Family Dwelling, one to six (1-6) residents;
2. Community Residential Home, seven to fourteen (7-14) residents; and
3. Assisted Living Facility; fifteen (15) or more residents.

~~The Broward County Land Use Plan defines categories of Special Residential Facilities, in accordance with Broward County Ordinance 85-92, for the purpose of determining permitted locations and density standards.~~

~~Special Residential Facilities development such as group homes and foster care facilities are defined by category type below and~~ are subject, when applicable, to the Special Residential Facilities provisions and allocation of redevelopment, flexibility, or bonus sleeping rooms as contained in the “Administrative Rules Document: Broward County Land Use Plan.” ~~In order to~~ To facilitate implementation of this section, each local government may permit a maximum of one hundred (100) “bonus” sleeping rooms, consistent with Broward County Ordinance 85-92, that are permanently dedicated to Special Residential use without allocating density. Special residential facilities are not specifically designated on the Future Broward County Land Use Plan Map (Series) as a separate land use category.

Special residential facilities are permitted within limitations as stated in the Permitted Uses section of this plan in the following land use categories:

1. Agricultural
2. Commerce
3. Community
4. Residential

Density calculation for Special Residential Facilities shall be calculated as follows:

- Community Residential One-Family Dwelling with one to six (1-6) shall count as one (1) dwelling unit each.

**Urban Planning Division Comments**  
**March 14, 2025**

- Community Residential Home with seven to ten (7-10) residents shall count as two (2) dwelling units each.
- Community Residential Home with ten to fourteen (10-14) residents shall count as three (3) dwelling units each.
- Assisted Living Facilities shall count Every bedroom as a half (0.5) dwelling unit.

Broward County does not encourage local governments to locate special residential facilities in commercial, office park or community facilities areas. Special residential facilities should be integrated into residential neighborhoods. However, due to the need to locate special residential facilities, the Broward County Land Use Plan recognizes that, in some instances, local governments may have need to allocate special residential facilities in these areas.

~~Definitions of Special Residential Facilities Categories: SPECIAL RESIDENTIAL FACILITY, CATEGORY (1) means a housing facility which is licensed by the State of Florida for no more than eight (8) individuals who require treatment, care, rehabilitation or education. The facility is usually referred to as a group home. This includes individuals who are elderly, dependent children, physically disabled, developmentally disabled or individuals not overtly of harm to themselves or others. The facility provides a family living environment including supervision and care necessary to meet the physical, emotional and social needs of the individuals. It may or may not provide education or training. There may be more than one kitchen within the housing facility. There may be more than one Special Residential Facility Category (1) development on a parcel. SPECIAL RESIDENTIAL FACILITY, CATEGORY (2) means a housing facility which is licensed by the State of Florida for nine (9) to sixteen (16) non-elderly individuals who require treatment, care, rehabilitation or education. This includes individuals who are dependent children, physically disabled, developmentally disabled or individuals not overtly of harm to themselves or others. The facility provides a family living environment including supervision and care necessary to meet the physical, emotional and social needs of the individuals. It may or may not provide education or training. There may be more than one kitchen within the housing facility. There may be more than one Special Residential Facility Category (2) development on a parcel.~~

~~SPECIAL RESIDENTIAL FACILITY, CATEGORY (3) means (a) Any housing facility licensed by the State of Florida for more than sixteen (16) non-elderly individuals who require treatment, care, rehabilitation or education. This includes individuals who are dependent children, physically disabled, developmentally disabled or individuals not overtly of harm to themselves or others; or (b) Any housing facility licensed by the State of Florida for more than eight (8) unrelated elderly individuals; or (c) Governmentally subsidized housing facilities entirely devoted to care of the elderly, dependent children, the physically handicapped, developmentally disabled or individuals not overtly of harm to themselves or others; or (d) Any not for profit housing facility for unrelated elderly individuals; or (e) Any housing facility which provides a life care environment. A life care environment shall include, but is not limited to, creation of a life estate in the facility itself and provision of off-site or on-site medical care.~~

### **XIII. BROWARD NEXT ADMINISTRATIVE RULES DOCUMENT**

#### **5.2 BROWARDNEXT - BROWARD COUNTY LAND USE PLAN POLICY 2.16.2**

For amendments which propose to add 100 or more residential dwelling units to the existing densities approved by the BCLUP, Broward County and affected municipalities shall coordinate and cooperate to implement the affected municipality's chosen policies, methods and programs to achieve and/or maintain a sufficient supply of affordable housing.

In addressing amendments which propose to add 100 or more residential dwelling units to the existing densities approved by the BCLUP, the municipality, without limitation, shall ~~may include consideration and implementation of~~ the following affordable housing strategies:

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- b. programs and policies involving mechanisms such as, but not limited to, impact fees, in-lieu fees, and/or public funds, in which the municipality, and/or Broward County, and/or other appropriate agencies/entities (including, but not limited to, major employers), provide funding to facilitate the affordable purchase or renting of housing;

Further, in addressing amendments which propose to add 100 or more residential dwelling units to the existing densities approved by the BCLUP, the municipality, without limitation, may include consideration and implementation of the following affordable housing strategies:

- ae. programs and policies in which the municipality and/or Broward County, and/or other appropriate agencies, facilitate the maintenance of the existing supply of affordable housing stock, if any;
- bd. property tax abatement programs aimed at preserving or creating affordable housing;
- ce. streamlined and reduced-cost permitting procedures for affordable housing;
- df. specific minimum set-aside requirements for new affordable housing construction;

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- eg. use of appropriate existing public lands, or public land-banking, to facilitate an affordable housing supply;
- fh. programs and policies to facilitate the development and use of municipal and/or Broward County affordable housing density bonus provisions;
- gi. land development regulations which promote the availability of affordable housing such as reduced lot size and floor area for dwelling units, construction of zero lot line and cluster housing, vertical integration of residential units with non-residential uses, and the allowance of accessory dwelling units;
- hj. the existing supply of affordable housing.

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### 5.3 DESCRIPTION OF SELECT TERMS USED IN POLICY 2.16.2

The following are descriptions of select terms used in Policy 2.16.2 as they relate to implementation of the Policy.

#### **Professionally Accepted Methodologies, Policies and Best Available Data and Analysis:**

Used to prepare a study, report, or information submitted by the local governing body which includes estimates of the existing supply of affordable housing (i.e. “very low,” “low” and “moderate”) within the local government boundary in comparison to the estimated affordable housing supply that is needed to achieve and/or maintain a sufficient supply.

The local government shall estimate its supply of affordable housing utilizing the most recent “Broward County Affordable Housing Needs Assessment,” ~~2018~~, prepared by The Metropolitan Center Florida International University, as may be updated and accepted by the Broward County Board of County Commissioners, ~~after January 7, 2021~~. The local government may submit additional data and analysis regarding the unique circumstances of its municipality.

A sufficient supply for affordable housing must be consistent with a minimum 5 year planning horizon, but no greater than the adopted planning horizon of the local government comprehensive plan.

~~The demand and supply may consider the existing availability of affordable housing within 3 miles within a contiguous local government, subject to approval by such contiguous local government.~~

**In-Lieu:** Refers to either a commitment to provide on-site affordable dwelling units or monies paid to the local government or the Broward County Affordable Housing Trust

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Fund by developers when affordable housing is not included on-site in a development in compliance with a standard adopted by the local government, as follows:-

- Broward County will use 15% of project housing units as a default guideline for an affordable housing standard within proposed residential development subject to Policy 2.16.2; however, a local government may officially adopt a different standard. However, if the standard is lower than 15% the local government must demonstrate that the proposed level is consistent with demand in the applicable area; or
- An in-lieu payment to the local government or the Broward County Affordable Housing Trust Fund equal to \$10,609 per unit (which sum shall increase by 3% annually, effective January 1, 2025, and consistent with Broward County Land Use Plan Policy 2.16.4 in-lieu payment) for the total number of units within the development.

Such monies must be used by the local government to fund affordable housing construction and/or programs. In-lieu monies shall be sufficient to provide for the availability of affordable housing consistent with the standard set by the local government.

Should the local government and developer agree to an in-lieu of fee, the local government shall have the sole and absolute discretion regarding how and where said payment shall be utilized, consistent with its housing policies and programs and shall not be subject to review by the Broward County Commission. If the local government and developer agree to an in-lieu of fee and direct the funds to the Broward County Affordable Housing Trust Fund, the Broward County Commission shall have sole and absolute discretion regarding how and where said payment shall be utilized, consistent with its housing policies and programs.

~~The in-lieu methodology identifies the costs associated with achieving the development of affordable housing units within the local government. For example, an in-lieu methodology may be calculated at a rate per gross square foot per new market rate residential unit. As an alternative example, the in-lieu methodology may be based on a percentage of the costs of construction or sales price of all new market rate units within a project.~~

~~Broward County will use one dollar (\$1) per gross square foot (gross floor area) of the residential dwelling unit as a default guideline in the review of in-lieu methodologies for all additional market rate units within a project; however, a local government may officially approve, as part of their affordable housing report and strategy, a different standard and program utilizing professionally accepted methodologies, policies and best available data and analysis.~~

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~~**Gross Square Footage (Gross Floor Area):** The sum (in square feet) of the area of each floor level, measured from principal outside faces of exterior walls, including, but not limited to, basements, corridors, hallways, utility areas, elevators, storage rooms, stair cases, and mezzanines, but not including architectural projections. Included are areas that have floor surfaces with clear standing head room (6 feet, 6 inches minimum) regardless of their use. This definition includes areas which are not enclosed, but roofed; however, it does not include unroofed areas.~~

### **5.4 COUNTY STAFF GUIDELINES: DETERMINATIONS OF APPLICATION CONSISTENCY WITH POLICY 2.16.2**

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- (C) The study, report, or information submitted by the local governing body addressing Article 5.3 must utilize the most recent “Broward County Affordable Housing Needs Assessment,” ~~2018~~, prepared by The Metropolitan Center Florida International University, as may be updated and accepted by the Broward County Board of County Commissioners, ~~after January 7, 2021~~.
- (D) At a minimum, if a deficit of affordable housing is projected or assumed, Broward County will use 15% of ~~additional~~ project housing units as a default guideline for an affordable housing standard within proposed residential development subject to Policy 2.16.2; however, a local government may officially approve, as part of their affordable housing report and strategy, a different standard and program utilizing professionally accepted methodologies, policies and best available data and analysis.

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### **5.5 REVIEW PROCEDURES FOR LAND USE PLAN AMENDMENTS SUBJECT TO POLICY 2.16.2**

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- (B) If a land use plan amendment application is subject to Policy 2.16.2, Planning Council staff shall forward the application to the Broward County ~~Environmental Protection and Growth Management~~ Resilient Environment Department and request comments in a timeframe consistent with the Planning Council’s standard land use plan amendment review schedule.

**From:** [RICHARD BROWNSCOMBE](#)  
**To:** [Planning Council](#)  
**Subject:** Broward Next: Affordable Housing  
**Date:** Tuesday, March 18, 2025 9:16:21 PM  
**Attachments:** [Mixed-Income Projects.pdf](#)

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Dear Broward County Planning Council,

In Broward, where high-end private housing development is prevalent, mixed-income building requirements are an underutilized zoning strategy.

Typically, mixed-income apartment developers are required to construct and rent 20-30% of units for low- and middle-income tenants. These units must have rents within 30-50% of an occupant's income. These lower-rent units may be indistinguishable from high-rent units except in size and the luxury detailing of their interiors.

Well-designed mixed-income (and mixed-use) buildings are often perceived as more desirable by tenants, the neighborhood, and the city as a whole compared to exclusively high-end or exclusively low-end developments. Mixed-income and mixed-use buildings may raise the livability and appeal of a neighborhood. Our cities already have options for those who prefer high-end exclusivity. The success of mixed-income (and mixed-use) buildings effectively promotes this strategy and rewards those willing to implement an innovative housing strategy.

Broward County can utilize the experience and expertise of those who have already developed successful mixed-income housing in other communities. The recent scandal of public incentives to developers who ultimately failed to benefit low- and middle-income renters underscores the importance of requiring mixed-income rentals for the life of the building and drafting codes and contracts with care. I have attached examples of mixed-income housing projects for your reference.

Best regards,  
Richard Brownscombe

PDF Attachment:  
Mixed-Income Projects



## 1. Inclusionary Zoning Models

Many cities implement inclusionary zoning policies that require developers to include affordable units in market-rate developments:

- **Massachusetts Chapter 40B** allows developers to bypass certain local zoning restrictions if they make 20-25% of units affordable. While developers receive zoning relief, the financing is often entirely private.
- **New York City's Mandatory Inclusionary Housing (MIH)** requires 20-30% affordable units in rezoned areas. Some developers choose to build these even without utilizing tax incentives, particularly in high-value neighborhoods where market-rate units can cross-subsidize affordable ones.

## 2. Private Cross-Subsidization Models

Some developers have created business models around cross-subsidization without direct public funding:

- **Jonathan Rose Companies** has developed several projects where market-rate units effectively subsidize affordable ones. Their "Communities of Opportunity" model integrates various income levels with private financing, though they often utilize zoning bonuses.
- **Related Companies** began as an affordable housing developer and has created mixed-income

developments primarily through private financing, with higher-end units supporting the economics of lower-cost units.

### **3. Community Land Trusts with Private Development Partners**

While not purely private, some models separate land ownership from building ownership:

- **Champlain Housing Trust** in Vermont has partnered with private developers who finance and build mixed-income housing on trust-owned land, which reduces overall costs while maintaining permanent affordability.

### **4. Standards and Best Practices**

For operational standards in mixed-income developments:

- **Urban Land Institute** has published best practices for managing mixed-income communities, including design considerations that avoid stigmatizing affordable units while maintaining different price points.
- **Enterprise Community Partners** has developed standards for financially sustainable mixed-income operations that private developers can implement.

Note: Most successful examples involve some form of regulatory advantage or incentive, even if direct financial subsidies aren't used. The economics of purely private mixed-income housing typically work best in strong housing markets where premium units can generate sufficient revenue to offset below-market returns on affordable units.