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July 9, 2018

Commissioners,

The Lake Morton Neighborhood Association's Board of Directors, as representatives of the Lake Morton Neighborhoods (both East and South), respectfully oppose the proposed ordinance to allow an increase in building heights to 55 feet in the Lake Morton Historic Neighborhood parcels zoned MF-12 and MF-22.

There are many, many challenges to redevelopment in the historic district. A blanket building height increase could have many unintended negative consequences; and it does not appear to address any real obstacle to redevelopment in the neighborhood.

For example, our research shows large-scale developers look for parcels large enough to build a minimum of 250 units. There are no available parcels of that size currently available in the Lake Morton neighborhood. In addition, construction costs for taller residential structures increase exponentially as heights increase, which makes those taller structures not economically feasible in our neighborhood. Even the developer of the 10 acre site north of the police station where the land was assembled by the city and who was offered generous financial incentives said the cost of constructing taller buildings could not be supported by Lakeland's lease rates.

Multi-family development in Lake Morton is not going to look like new apartments in more suburban areas, like Highland City. It's going to occur on a smaller scale, on a parcel-by-parcel basis. We'd like to see planning that reflects this reality, in a way that uses height intelligently and with forethought.

We recognize the desire and need for more residential density in the urban core of our city where infrastructure and city services are readily available. We also understand the important role residential development plays in supporting our neighboring commercial districts – Downtown and Dixieland. The Lake Morton Neighborhood residents want to work with the city to identify appropriate building heights that promote smart growth and could include heights up to 55 feet where site characteristics and market forces could accommodate it.

Therefore we offer the following proposal as an alternative to the blanket height increase:

1. **Reject height increases to MF-12 in the historic Districts.** The MF-12 zoning primarily exists in areas densely populated by historic bungalows. Any multi-family new construction should be sensitive to the dominant one-story

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historic structures and should requires a variance for heights above the existing 40 feet.

- 2. **Put a stay on changes to MF-22 in the historic districts.** We recognize that the Garden District is dominated by vacant parcels and non-contributing structures. The Garden District could benefit from an increase to 55 feet. However, not every parcel is appropriate for 55 feet. LMNA requests the City's Planning Division further examine the Garden District, with input from neighborhood and property owners, potential impacts and benefits of the proposed changes and increased density. This would allow for a more fine-grained identification of subareas that are more suitable for higher building maximums and could potentially be implemented through zoning mechanisms such as the Garden District Special Public Interest zoning overlay district.

The City Commission should recognize that Lakeland's urban historic districts are different than other, more suburban areas, and that a one-size fits all approach is not appropriate.

LMNA desires to work with city staff in an effort to identify appropriate areas where density makes sense. We ask that you give us that opportunity by adopting the above proposed alternative to what is currently presented in regards to the residential districts with mulit-family zoning.

Sincerely,
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