AGENDA

MONROE COUNTY SPECIAL BOARD OF COUNTY COMMISSIONERS MEETING
December 19, 2024
10:00 AM

The Board will convene at the Marathon Government Center
2798 Overseas Hwy, Marathon
The meeting is open to the public.
Members of the public can also attend via Communications Media Technology at:
Zoom webinar: https://mcbocc.zoom.us/j/89204098700
To report problems with the broadcast or Zoom webinar, please call (305) 872-8831.

ADA ASSISTANCE: If you are a person with a disability who needs special accommodations in order to participate in this proceeding, please contact the County Administrator's Office, by phoning (305) 292-4441, between the hours of 8:30 a.m. - 5:00 p.m., prior to the scheduled meeting; if you are hearing or voice impaired, call "711". Live Closed Captioning is available via the MCTV portal @ https://cloud.castus.tv/vod/monroe/video/60832c9dcf67bb7ac0c21791?page=HOME&type=live for meetings of the Monroe County Board of County Commissioners.

A person may submit written comments or other physical evidence on a particular agenda item for consideration at the BOCC meeting via email to Lindsey Ballard @ ballard-lindsey@monroecounty-fl.gov County Administrator's Office, no later than 3:00 P.M. on the Monday prior to the meeting. The email must include the submitter's name, address, phone number and email address and the agenda item number the documents/comments are regarding. Any intellectual property submitted must include the appropriate authorization for use. Any person who wishes to be heard shall, prior to an item being called, provide the Clerk with his/her name and residence, and the agenda item on which he or she wishes to be heard. An individual has three minutes to address the Commission. However, the first person representing an organization has five minutes to address the Commission. Subsequent speakers for the same organization have three minutes to address the Commission. For land use items, the petitioner and, if the owner is different than the petitioner, then the owner of the property that is the subject of the land use item, will be allowed 20 minutes to address the Commission. Other people are allowed five minutes to address the Commission. Speakers appearing remotely via communications media technology may speak under the same time constraints as those speakers appearing live before the Commission. Remote speakers need not fill in a speaker card before speaking but must identify themselves and their addresses at the beginning of their remarks. Failure to do so may result in early termination of their speaking privileges for that item. For additional assistance, please call (305) 292-4441 or email your inquiry to: ballard-lindsey@monroecounty-fl.gov.

If a person decides to appeal any decision made by the board with respect to any matter considered at such meeting or hearing, he or she will need a record of the proceedings, and that, for such purpose, he or she may need to ensure that a verbatim record of the proceedings is made, which record includes the testimony and evidence upon which the appeal is to be based.

A. ADDITIONS, CORRECTIONS AND DELETIONS

B. SPECIAL BOCC MEETING

B1. An Ordinance by the Monroe County Board of County Commissioners Deferring: New ROGO Applications for Market Rate and Affordable ROGOs for ROGO Year 33, Quarter 3 and following, Awards by the Planning Commission of Market Rate and Affordable ROGO Allocations for ROGO Year 33, Quarter 3 and following, Reservations of Affordable ROGO Allocations, and New Applications for Administrative Relief, Commencing January 14, 2025, Until the BOCC Can Review and Possibly Amend the Comprehensive Plan and Land Development Code to Update the Criteria for ROGO Awards and Re-Distribute the County's Remaining Market Rate, Affordable, and Administrative Relief ROGO Allocations; Providing for Expiration Within 365 Days of the Effective Date of an Emergency Interim Development Ordinance or When Comprehensive Plan and Land Development Code Amendments Become Effective, Whichever Comes First; Providing for Severability; Providing for Transmittal to the State Land Planning Agency and the Secretary of State; Providing for an Effective Date.

B2. Consideration of a Resolution Requesting That The State of Florida Approve Additional Rate of Growth Ordinance (ROGO) Permit Allocations for Unincorporated Monroe County, Following an Analysis of Vacant Privately-Owned Land, Risk of Takings Liability, Workforce and Affordable Housing Considerations, and Considering Hurricane Evacuation Timeframe Requirements.

B3. Consideration of a Resolution By The Board Of County Commissioners Of Monroe County (â€œBoardâ€) Requesting Approval, By The State Of Florida, Of Additional Rate Of Growth Ordinance Building Permit Allocations And Board-Proposed Changes To Section 380.0552 Florida Statutes To Increase The Statutorily Required Hurricane Evacuation Clearance Time For The Florida Keys Area Of Critical State Concern From 24 Hours To 24.5 Hours To Accommodate The Building Of 500Â Units Of Additional Residential Development Within The Florida Keys And Key West Areas Of Critical State Concern, Following The Monroe County Planning And Environmental Resources Departmentâ€™s Analysis Of Privately Owned Vacant Parcels And Potential Affordable Housing Development Project Sites.

B4. Public Comment

C. COMMISSIONERS COMMENTS

COUNTY of MONROE
The Florida Keys

BOARD OF COUNTY COMMISSIONERS
Mayor James K. Scholl, District 3
Mayor Pro Tem Michelle Lincoln, District 2
Craig Cates, District 1
David Rice, District 4
Holly Merrill Raschein, District 5

Special Board of County Commissioners Meeting Meeting
December 19, 2024
Agenda Item Number: B1
2023-3446

BULK ITEM: No **DEPARTMENT:** Planning & Environmental Resources

TIME APPROXIMATE: **STAFF CONTACT:** Emily Schemper

AGENDA ITEM WORDING:

An Ordinance by the Monroe County Board of County Commissioners Deferring: New ROGO Applications for Market Rate and Affordable ROGOs for ROGO Year 33, Quarter 3 and following, Awards by the Planning Commission of Market Rate and Affordable ROGO Allocations for ROGO Year 33, Quarter 3 and following, Reservations of Affordable ROGO Allocations, and New Applications for Administrative Relief, Commencing January 14, 2025, Until the BOCC Can Review and Possibly Amend the Comprehensive Plan and Land Development Code to Update the Criteria for ROGO Awards and Re-Distribute the County's Remaining Market Rate, Affordable, and Administrative Relief ROGO Allocations; Providing for Expiration Within 365 Days of the Effective Date of an Emergency Interim Development Ordinance or When Comprehensive Plan and Land Development Code Amendments Become Effective, Whichever Comes First; Providing for Severability; Providing for Transmittal to the State Land Planning Agency and the Secretary of State; Providing for an Effective Date.

ITEM BACKGROUND:
On December 11, 2024, the BOCC directed Staff to draft an Interim Development Ordinance to establish a Moratorium on ROGO Applications and Awards starting in ROGO Year 33, Quarter 3 (for which the application cycle begins January 14, 2025), in order to allow time for review and potential adoption of Comprehensive Plan and Land Development Code amendments that would re-distribute the currently remaining ROGO allocations (92 market rate, approximately 12 affordable, 144 administrative relief) over a longer time period, in anticipation of limited or no additional ROGO allocations being approved by the State.

This direction was preceded by meetings with the Commerce Department and the Executive Office of the Governor, whereby county staff met and discussed the BOCC request for issuance of 100 of 220 ROGO allocations available within the State hurricane model that can be issued prior to permanent residents exceeding 24 hours to evacuate in the event of a hurricane.

During these meetings, Commerce and the Governor's Office staff indicated they were not willing to

process the request to issue 220 allocations through the state Administration Commission and asked that all jurisdictions in the Keys finish issuing the allocations they currently have on hand and process the request for their respective portion of the 220 ROGO allocations through a Comprehensive Plan amendment. Based on this input, it became apparent that, because the timing to process a Comprehensive Plan amendment is close to one year and there is a risk to the County's long-term liability, the County should hold off issuing the currently remaining allocations and instead spread the allocations over a longer time period. Continuing to issue the remaining allocations with no moratorium would mean by the time the outcome of the Comprehensive Plan amendment is known in a year, there would not be enough allocations to spread out over time to stave off potential lawsuits if additional allocations are not approved and the County runs out of allocations.

Therefore, staff is recommending the BOCC institute a moratorium through the attached emergency interim development ordinance and hold off on issuing allocations until Comprehensive Plan and Land Development Code amendments are processed to spread out the allocations. If the State approves more allocations, the BOCC can then re-adjust the annual allocation amounts and resume permitting at the rate adopted by the BOCC.

If we do not start the comprehensive plan amendment process and put the allocations on hold, by the time we know whether any additional units will be given by the State of Florida to the Keys areas of critical state concern (which would likely be known around summer of 2025), we may use too many of the remaining allocations to make a

meaningful revision to allocations rate and therefore put the county at risk for potential takings lawsuits from private property owners who are not able to obtain a permit for construction of a residential dwelling unit.

Attached are two tables showing: 1) The remaining County allocations and when the final units will be awarded, at which point the County will no longer have market rate allocations available; and 2) How the remaining County allocations could be re-distributed over a longer time period following the proposed moratorium.

PREVIOUS RELEVANT BOCC ACTION:
On December 11, 2024, the BOCC directed staff to draft an IDO to defer applications and awards of ROGO alloacations beginning ROGO Year 33 Quarter 3 until amendments can be considered to re-distribute remaining allocations.

INSURANCE REQUIRED:
No

CONTRACT/AGREEMENT CHANGES:
N/A

STAFF RECOMMENDATION: Approval.

DOCUMENTATION:

Monroe County 100 of 220 ALLOCATIONS request timeline
Remaining Allocation Re-Distribution with Moratorium
Draft_Emer._IDO__Rev.__EMS_PM.doc
Draft_Emer._IDO__Rev.__EMS_PM (Stamped-and-Signed Version).pdf

---

FINANCIAL IMPACT:
N/A

Remaining ROGO Allocations Monroe County		2024	2025				2026				2027				2028				2029			
	Balance of Allocations as of November, 2024	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
		ROGO Year 33; Qtr. 2	ROGO Year 33; Qtr. 3	ROGO Year 33; Qtr. 4	ROGO Year 34; Qtr. 1	ROGO Year 34; Qtr. 2	ROGO Year 34; Qtr. 3	ROGO Year 34; Qtr. 4														
Legislative Session																						
Comprehensive Plan Amendments after Session																						
Comprehensive Plan amendments if we get 220 on December 17																						
Administration Commission Meeting Dates		**December 17, 2024**																				
Unincorporated Monroe County																						
Market-rate ROGO/BPAS from 2012 Allocation	**110**	16	15	15	16	16	15	15														
Affordable ROGO/BPAS from 2012 Allocation	**12**	Affordable available on first come, first serve basis.																				
Administrative Relief Allocations	**144**	Administrative Relief allocations are reserved for administrative relief and beneficial use processes.																				
Early Evacuation Unit Allocations	**214**	Not available at this time. Comprehensive Plan text amendment pending. Can only be used for multi-family sites.																				
Request for 220 Allocations (2024)	**100**								16	16	15	15	16	16	6							

Interim Development Ordinance (IDO)

Moratorium until January 2026

40/Year Distribution

92 Market Rate + 12 Affordable + 144 Administrative Relief = 248 Total

2025	2026	2027	2028	2029	2030	2031	2032	Total
Moratorium	40	40	40	40	40	40	8	248
	Comprehensive Plan Amendment Effective				*2030 Census			
0 Affordable remaining (converted to market rate)								
214 Early Evac Affordable remaining								

MONROE COUNTY, FLORIDA
MONROE COUNTY BOARD OF COUNTY COMMISSIONERS

ORDINANCE NO. _____ - 2024

AN ORDINANCE BY THE MONROE COUNTY COMMISSIONERS DEFERRING THE ACCEPTANCE OF OR RECEIPT OF OR APPROVAL OF NEW MARKET RATE AND AFFORDABLE ROGO APPLICATIONS BEYOND Y33 Q2 THROUGH JANUARY 13TH, 2025, ROGO AWARDS BEYOND Y33 Q2, ROGO APPLICATION REVISIONS BEYOND JANUARY 13TH, 2025, REMAINING AFFORDABLE HOUSING ROGOS, ADMINISTRATIVE RELIEF ROGO AWARDS, AND APPLICATIONS FOR ADMINISTRATIVE RELIEF ROGOS AND/OR APPLICATIONS FOR ADMINISTRATIVE RELIEF ROGO AWARDS RECEIVED BEYOND JANUARY 13TH, 2025, UNTIL THE MONROE COUNTY BOARD OF COUNTY COMMISSIONERS CAN REVIEW AND POSSIBLY AMEND THE MONROE COUNTY LAND DEVELOPMENT CODE AND/OR COMPREHENSIVE PLAN REGARDING THE ALLOCATION AND PERMITTING OF RESIDENTIAL DEVELOPMENT; PROVIDING FOR EXPIRATION IN NO MORE THAN 365 DAYS OF THE DATE OF THIS EMERGENCY INTERIM DEVELOPMENT ORDINANCE OR WHEN THE COMPREHENSIVE PLAN AND LAND DEVELOPMENT CODE AMENDMENTS BECOME EFFECTIVE, WHICHEVER COMES FIRST; PROVIDING FOR SEVERABILITY; PROVIDING FOR TRANSMITTAL TO THE STATE LAND PLANNING AGENCY AND THE SECRETARY OF STATE; PROVIDING FOR AN EFFECTIVE DATE.

WHEREAS, the unincorporated Florida Keys constitute a countywide State-designated Area of Critical State Concern ("Florida Keys ACSC"), as established by and through Rule 28-29.002, Florida Administrative Code, and Sections 380.05 and 380.0552, Florida Statutes; and

WHEREAS, the enabling legislation for the designation of areas of critical state concern provide and hold as follows: "An area of critical state concern may be designated only for: An area containing, or having a significant impact upon, environmental or natural resources of . . . statewide significance, . . . the uncontrolled private or public development of which would cause substantial deterioration of such resources." Fla. Stat. § 380.05(2)(a); and

WHEREAS, pursuant to Section 380.0552(9)(a)(2.), Florida Statutes, all local comprehensive plans within the Florida Keys ACSC must include goals, objectives, and policies to protect public safety and welfare in the event of a natural disaster by maintaining a hurricane evacuation clearance time for the permanent residents of the Florida Keys of no more than 24 hours, the hurricane evacuation clearance time shall be determined by a hurricane evacuation study conducted in accordance with a professionally accepted methodology and approved by the state land planning agency ("Florida Department of Commerce"), and for purposes of hurricane evacuation clearance time:

a. Mobile home residents are not considered permanent residents.

b. The City of Key West Area of Critical State Concern established by Chapter 28-36, Florida Administrative Code, shall be included in the hurricane evacuation study and is subject to the evacuation requirements of this subsection; and

WHEREAS, in 2023, following the 2020 U.S. Census, the Florida Department of Commerce completed an update to the hurricane evacuation modeling task which included Baseline Modeling and, per the December 2023 Florida Keys Hurricane Evacuation Modeling Report (the "Report"), "**five additional scenarios (S1-S5)…that examined the effect of prospective building allocations, to facilitate discussion…to help inform future policy considerations that may be considered by state and local officials and stakeholders**"; and

WHEREAS, Table 3 from the Report, which summarized Hurricane Evacuation Clearance times for each scenario modeled, is attached hereto as Exhibit A.; and

WHEREAS, the Report's Scenario 4 ("S4") showed that 220 additional residential permit allocations would be the maximum that may be legally awarded without exceeding and violating the statutorily required 24-hour hurricane evacuation clearance timeline, distributed Keys-wide as follows: Unincorporated Monroe County: 100, Marathon: 40, Islamorada: 40, and Key West: 40 affordable; and

WHEREAS, Monroe County has begun the necessary steps to establish a new category of housing within the Monroe County Comprehensive Plan and Land Development Code, "Workforce Market Rate Housing", which would be limited to use and occupancy by those who derive at least 70 percent of their income as members of the Workforce in Monroe County, gainfully employed providing goods and/or services to Monroe County residents or visitors; and

WHEREAS, as was explained by the County's professional staff per the below, state law, as informed by the State of Florida's latest hurricane evacuation modeling, allows 220 residential building permit allocations to be granted to the County and municipalities without violating the 24-hour hurricane evacuation clearance time requirement enshrined at Section 380.0552, Florida Statutes, and Chapter 28-20, Florida Administrative Code, however that the State of Florida is uncomfortable issuing said 220 allocations at this time, as follows:

Monroe County Planning and Environmental Resources Department Senior Director Emily Schemper[1]: "Option 1, from last month, was to stay within the 24-hour evacuation maximum of 220 for all jurisdictions in the Keys. So this was [the Florida Department of] Commerce's modeled scenario that kept us within 24 hours, the maximum countywide was 220 units, 100 of those were modeled for unincorporated Monroe County, and then 40 each for Islamorada, Marathon, and Key West, as affordables for Key West. The chart below is a portion, it's the unincorporated County portion of a chart that we have been using to communicate with the State about the need for the 220 units or the 100 for Monroe County, and it shows how . . . Our current allocations here that are remaining are set to run out at the end of Quarter 2 of 2026. So the red bar starts where we're out of our normal market rate allocations. We do of course have 12 affordable housing and 144 administrative relief [allocations] and 214 early evacuation [allocations] that are, or, hopefully soon will be available, for those types of housing. But those are not your general ROGO allocations that your normal everyday applicant for a housing unit is applying for. In pink at the bottom here, if the County were to receive our 100 units from the 220, we would hopefully start those up right after our normal allocations run out, and if we continue at the same rate of distribution as today, it would take us through about a year and a half, almost two years, of additional out-time for allocations, before we would then run out of those.

. . .

The next two slides are basically a summary of what's been happening over the last week. . . . The County of course requested, through a letter to the State [of Florida], that they approve the 220 units that are already included in the 24-hour evacuation timeframe per their model. We sent that letter in October, staff met with Commerce in October, got positive feedback regarding workforce housing especially. Our request was very specific to match the modeling they had already done to be able to say 'Yes, per your model, this shows 24 hours, no need to change the statute.' That was 100 for unincorporated Monroe County, 40 each for Islamorada and Marathon, and Key West. The Key West units were very specific that they would be affordable. And our original intent then was to get approval from the Administration Commission and then we would process Comprehensive Plan amendments. That's what happened with the 1,300 early evacuation [allocation units]. It [i.e., the category of 1,300 early evacuation allocations] was approved by the Administration Commission, and then each jurisdiction processed their local amendments to accept them and figure out how to give them out.

. . .

[1] A.I.C.P. (American Institute of Certified Planners – Certified Planner), C.F.M. (Association of State Floodplain Managers (A.S.F.M.) – Certified Floodplain Manager (C.F.M.)).

Staff has now been told by the State [of Florida] they are not in favor of even approving those 220 units until all remaining allocations, including administrative relief, have been expended.

. . .

The State [of Florida] also told staff that would like the County to give a portion of the County's remaining market rate allocations, which we have stretched out through 2026, and kept in our administrative relief pool, to Marathon and Islamorada who have a more urgent 'need' for units. Staff was very clear with [the State of Florida] that staff would not support something like this, because of the long-term liability that the County has. We [the County] have been looking ahead, planning, for *this*. And have tried to be strategic. We did agree to put this request in front of the Board though, because they were asking.

Another thing the State requested is that, and this is a little confusing: That the County proceed with a Comprehensive Plan amendment to accept our share of the 220 (100 Monroe County allocations) because the Administration Commission is not planning to approve it, but they said 'proceed with your Comprehensive Plan amendment.' What that would do is basically force a decision from the State; they did not say it this way, but when we transmit that [Comprehensive Plan] amendment to Florida Commerce, they need to review it and decide if it's consistent with Florida Statute. So staff's in favor of that, we should do what they said, and move forward with that Comprehensive Plan amendment if you want those 100 units, and we'll see how it plays out. That leads me to specific things we're requesting direction on today.

So number one would be to begin processing that Comprehensive Plan and also a Code amendment to accept our 100 ROGOs.

And then number two, given that the State is saying they're not in favor of even giving the 220 without us expending all of our units, staff's recommendation and request would be that we bring back to you on December 19 a moratorium through an emergency interim development ordinance, that we put a hold on issuing any more ROGO allocations or taking in any more ROGO applications, it would last about a year while we process amendments that also take our remaining allocations – market rate, and administrative relief – and stretch those out for a longer time-frame.

If we skip the moratorium and just process an amendment like that it would take a year to complete and at that point we would only have about 30 market rate units left to stretch out.

So that's why we're requesting a moratorium: Put everything on hold for about a year, the numbers would be (by the time we get to it) about 108 market rate, plus our 144 administrative relief, so a total of 252 [allocations], [and] if we stretched

those out at 40 per year (which again we're trying to stay within the comfort zone but make it as low as possible), 40 per year, that would bring us past the next Census, which is good because there may be more new information and modeling then, it would bring us into about 2032.

We would of course still have our 12 affordable, and once our amendment goes through with the 214 early evacuation, we could still continue to issue those if there are projects ready to go.

But this [moratorium] would be for the market rates and also administrative relief.

At the same time we would be processing that Comprehensive Plan amendment to accept an additional 100 [allocations] that stay within the 24 hours. If that gets accepted [by the State of Florida], then we could modify this timeline, either add to it, or add more years on the end, we can work on that. But our request would be that we take immediate action to protect ourselves if worst case scenario we're not getting any more units at all."

See Monroe County Board of County Commissioners Meeting (Dec. 11, 2024).

WHEREAS, Monroe County policies and regulations adopted in the Monroe County Comprehensive Plan and Land Development Code are to maintain the public health, safety, and welfare of the citizens of the Florida Keys and to strengthen our local capability to responsibly manage land use and development; and

WHEREAS, the Monroe County Comprehensive Plan requires that all "development" must be consistent with the State of Florida's statutory Principles for Guiding Development in the Florida Keys Area of Critical State Concern. *Introduction*, Monroe County Comprehensive Plan ("[A]ll planning and development within the Florida Keys must be consistent with Sections 380.05 and 380.0552(7), F.S., Principles for Guiding Development."). Accordingly, "development" in Monroe County must be consistent with the following Principles for Guiding Development in the Florida Keys Area of Critical State Concern:

(g) Protecting the historical heritage of the Florida Keys.

(l) Making available adequate affordable housing for all sectors of the population of the Florida Keys.

(n) Protecting the public health, safety, and welfare of the citizens of the Florida Keys and maintaining the Florida Keys as a unique Florida resource.

Fla. Stat. §§ 380.0552(7)(g), (l), and (n).

WHEREAS, the statutorily adopted State Comprehensive Plan's Goals and Policies, which provide(s) basic policy direction to all levels of government concerning

"the orderly social, economic, and physical growth of the state", similarly direct(s) the State and Monroe County to conduct their growth management framework and regulatory activities as follows:

(4)(a) HOUSING.– *Goal*.– The public and private sectors shall increase the affordability and availability of housing for low-income and moderate-income persons, including citizens in rural areas, while at the same time encouraging self-sufficiency of the individual and assuring environmental and structural quality and cost-effective operations.

(4)(b)(3.) *Policies*.– Increase the supply of safe, affordable, and sanitary housing for low-income and moderate-income persons and elderly persons by alleviating housing shortages, recycling older houses and redeveloping residential neighborhoods, identifying housing needs, providing incentives to the private sector to build affordable housing, encouraging public-private partnerships to maximize the creation of affordable housing, and encouraging research into low-cost housing construction techniques, considering life-cycle operating costs.

(5)(b)(2.)(c.) HEALTH.– *Policies*.– Government shall ensure that future growth does not cause the environment to adversely affect the health of the population.

(6)(a) PUBLIC SAFETY.– *Goal*.– Florida shall protect the public by preventing, discouraging, and punishing criminal behavior, lowering the highway death rate, and protecting lives and property from natural and manmade disasters.

(6)(b)(22.) *Policies*.– Require local governments, in cooperation with regional and state agencies, to prepare advance plans for the safe evacuation of coastal residents.

(6)(b)(23.) *Policies*.– Require local governments, in cooperation with regional and state agencies, to adopt plans and policies to protect public and private property and human lives from the effects of natural disasters.

(15) LAND USE.– *Goal*.– In recognition of the importance of preserving the natural resources and enhancing the quality of life of the state, development shall be directed to those areas which have in place, or have agreements to provide, the land and water resources, fiscal abilities, and service capacity to accommodate growth in an environmentally acceptable manner.

(15)(b)(1.) *Policies*.– Promote state programs, investments, and development and redevelopment activities which encourage efficient development and occur in areas which will have the capacity to service new population and commerce.

Fla. Stat. §§ 187.101(1), 187.201(4)(a), 187.201(4)(b)(3.), 187.201(5)(b)(2.)(c.), 187.201(6)(a), 187.201(6)(b)(22.), 187.201(6)(b)(23.), 187.201(15), and 187.201(15)(b)(1.).

WHEREAS, the legislative intent of the Florida Keys Area Protection Act include(s):

(b) Establish a land use management system that conserves and promotes the community character of the Florida Keys.

(d) Provide affordable housing in close proximity to places of employment in the Florida Keys.

(e) Establish a land use management system that promotes and supports a diverse and sound economic base.

(j) Ensure that the population of the Florida Keys can be safely evacuated.

Fla. Stat. §§ 380.0552(2)(b), (d), (e), and (j).

WHEREAS, the Monroe County Board of County Commissioners finds, concludes, and adopts as the basis for, intent and purpose of the adoption of this ordinance the local and state laws of Monroe County and Florida cited and memorialized at the above and foregoing first, second, seventh, ninth, tenth, eleventh, and twelfth prefatory recitals to this ordinance; and

WHEREAS, the Monroe County Board of County Commissioners concurs with, approves, and adopts as the basis for, intent and purpose of the adoption of this ordinance the considered analysis and explanation articulated by Monroe County professional staff cited and memorialized at the above and foregoing eighth prefatory recital to this ordinance; and

WHEREAS, the above and foregoing prefatory recitals to this ordinance setting forth the express basis for, intent and purpose of adoption of this ordinance constitute a non-exhaustive list of the conceivable rational and legitimate reasons for the adoption of this ordinance; and

WHEREAS, an ordinance addressing the interim time period between the current adopted Land Development Code and Comprehensive Plan and the adoption of any new amendment(s) is necessary to ensure that any new Comprehensive Plan and Code requirements are fully and responsibly evaluated to ensure the public health, safety, and welfare of the citizens of unincorporated Monroe County; and

WHEREAS, the Monroe County Board of County Commissioners hereby finds and concludes that all of these foregoing bases for and that the intent and purpose of adopting this ordinance accordingly has an eminent foundation in reason and has a substantial relation to the public health, public safety, and the public welfare; and

WHEREAS, the Monroe County Board of County Commissioners hereby finds and concludes that, therefore, there is an eminently rational relationship between the

adoption of this ordinance and conceivable legitimate governmental objective(s) and that such finding and conclusion is not beyond fair debate; and

WHEREAS, the Monroe County Board of County Commissioners hereby finds and concludes that the finite moratorium enumerated herein is rationally related to the County's sensible and prudent attempt to preserve the status quo while it formulates and/or works toward adoption of regulatory land use framework amendments during said moratorium; and

WHEREAS, "[i]t is well-settled that permissible bases for land use" regulations "include concern about the effect of" development "on traffic, on congestion, on surrounding property values, on demand for" local public "services, and on other aspects of the general welfare. It is" further "within the power of the [local] legislature to determine that the community should be beautiful as well as healthy, spacious as well as clean, well-balanced as well as carefully patrolled." *WCI Communities, Inc. v. City of Coral Springs*, 885 So. 2d 912, 915 (Fla. 4th DCA 2004);

WHEREAS, "temporary moratoria are widely used among land-use planners to preserve the status quo while formulating a more permanent development strategy[.]" *WCI Communities, Inc.*, 885 So. 2d at 915-16 (Fla. 4th DCA 2004) (internal citation omitted); and

WHEREAS, Monroe County desires to impose a temporary moratorium upon certain development, development applications, and/or activities and/or applications associated with development as described more particularly in the title of this ordinance and further below, due to pending quasi-legislative policy formulation and/or policy adoption more particularly described at the above first, second, seventh, eighth, ninth, tenth, eleventh, and twelfth prefatory recitals to this ordinance;

NOW, THEREFORE, BE IT ORDAINED BY THE BOARD OF COUNTY COMMISSIONERS OF MONROE COUNTY, FLORIDA:

Section 1. **Recitals.** The foregoing recitals, findings of fact, statements of local quasi-legislative purpose and intent, and conclusions of law are true and correct and are hereby incorporated as if fully stated herein.

Section 2. **Emergency Declaration.** Pursuant to subsection (4) of Section 125.66, Florida Statutes, the Board of County Commissioners of Monroe County, Florida, declare that the above-stated recitals constitute an emergency that justifies waiving the requirement to issue a notice of intent to adopt an ordinance in subsection (2) and dispensing with the publication of a business impact statement required by subsection (3).

Section 3. **Moratorium Imposed.** Monroe County professional staff shall defer the acceptance of, receipt of, and/or approval of market rate ROGO ("Rate of Growth Ordinance") applications, commencing December 19, 2024, until

the Board can review and possibly amend the Monroe County Land Development Code and/or Comprehensive Plan regarding the allocation and permitting of residential development. This temporary moratorium shall be applied and enforced as more particularly enumerated below:

(a) New ROGO Applications for market rate and/or affordable allocations will continue to be received and accepted for ROGO Year 33, Quarter 2, per normal established procedures through the quarter's closing date, which is January 13th, 2025.

(b) No new ROGO Applications for market rate and/or affordable allocations will be received or accepted following the closing date of ROGO Year 33, Quarter 2, which is January 13th, 2025.

(c) No Revisions of ROGO Applications will be received or accepted following the closing date of ROGO Year 33, Quarter 2, which is January 13th, 2025.

(d) ROGO Awards for market rate and/or affordable allocations for ROGO Year 33, Quarter 2 will be considered and approved by the Planning Commission, as per normal distribution schedule.

(e) No ROGO Awards for market rate and/or affordable allocations will be considered or approved for ROGO Year 33, Quarter 3 or any quarter that follows, until the temporary moratorium expires.

(f) No new applications for Administrative Relief will be received or accepted following the closing date of ROGO Year 33, Quarter 2, which is January 13th, 2025.

(g) Applications for Administrative Relief received and accepted prior to January 13th, 2025, will be processed according to normal procedures during the temporary moratorium.

(h) ROGO Applications that become eligible for Administrative Relief during the temporary moratorium will be notified of eligibility upon expiration of the temporary moratorium and given the opportunity to submit an Administrative Relief application at that time.

(i) No new Reservations of affordable ROGO allocations shall be approved by the BOCC after January 13th, 2025. Extensions of existing Reservations may be approved by the BOCC during the temporary moratorium.

(j) Current, previously submitted and accepted ROGO Applications shall continue to accrue perseverance points during the temporary moratorium, per the adopted rate of accrual for each particular application.

(k) Property owners may continue to submit Building Permit applications for new dwelling units during the temporary moratorium. However, in the event that the Florida Building Code and/or a FEMA flood insurance rate map (FIRM) is amended during the temporary moratorium, if necessary, the applicant shall submit plan revisions to the building permit application demonstrating full compliance with the current Florida Building Code and the adopted FIRM in effect.

(l) Building permit applications that are reviewed during the temporary moratorium and determined to be "ready" to submit a ROGO application shall be given 180 days following expiration of the moratorium to submit the ROGO application. If no ROGO application is submitted within this timeframe, the building permit application is subject to expiration unless an extension is obtained from the Building Official.

(m) Building permit applications for which the deadline to submit a ROGO application falls within the temporary moratorium will be given a new deadline of 180 days following expiration of the moratorium to submit the ROGO application.

Section 4. **Temporary Nature of Moratorium.** This moratorium is temporary and shall automatically expire after 365 days' passage following the adoption of this Ordinance or shall automatically expire when all above-referenced forthcoming Land Development Code and Comprehensive Plan amendments have been fully and finally adopted, whichever occurs first. In no event shall the moratorium imposed by this ordinance extend beyond 365 days from the adoption of this Ordinance. This Section does not foreclose the right and power of the Board to extend this temporary moratorium in order to effectuate the adoption and legal effectiveness of the above-referenced Land Development Code and Comprehensive Plan amendments in progress.

Section 5. The Monroe County Board of County Commissioners finds and concludes that approval of this ordinance in fact and law will benefit the health, safety, and welfare of the public at large.

Section 6. **Inconsistency, Partial Invalidity, Severability, and Survival of Provisions.** If any provision of this Ordinance, or part or any portion thereof, is held to be invalid or unenforceable in or by any administrative hearing officer or court of competent jurisdiction, the invalidity or unenforceability of such provision, or any part or portion thereof, shall neither limit nor impair the operation, enforceability, or validity of any other provision of this Ordinance, or any remaining part(s) and/or portion(s) thereof. All other provisions of this Ordinance, and remaining part(s) and/or portion(s) thereof, shall continue unimpaired in full force and effect.

Section 7. **Captions and Paragraph Headings.** Captions and paragraph headings, where used herein, are inserted for convenience only and are not intended to descriptively limit the scope and intent of the particular paragraph or text to which they refer.

Section 8. **Conflicting Provisions.** All ordinances or parts of ordinances in conflict with this Ordinance are hereby repealed to the extent of said conflict. The

repeal of an ordinance herein shall not repeal the repealing clause of such ordinance or revive any ordinance which has been repealed thereby.

Section 9. **Transmittal.** This Ordinance shall be transmitted to the Florida State Land Planning Agency pursuant to Chapter 163 and 380, Florida Statutes.

Section 10. **Effective Date.** This Ordinance shall become effective as provided by the general law requirements for ordinance adoption within the Florida Keys Area of Critical State Concern enumerated at Chapters 163 and 380, Florida Statutes.

PASSED AND ADOPTED by the Board of County Commissioners of Monroe County, Florida, at a regular meeting held on this 19th day of December, 2024.

Mayor James K. Scholl, District 3	_____
Mayor *Pro Tem* Michelle Lincoln, District 2	_____
Commissioner Craig Cates, District 1	_____
Commissioner Holly Merrill Raschein, District 5	_____
Commissioner David Rice, District 4	_____

By: _____
Mayor James Scholl

(SEAL)

ATTEST: KEVIN MADOK, CLERK

_____
AS DEPUTY CLERK

MONROE COUNTY, FLORIDA
MONROE COUNTY BOARD OF COUNTY COMMISSIONERS

ORDINANCE NO. _____ - 2024

AN ORDINANCE BY THE MONROE COUNTY COMMISSIONERS DEFERRING THE ACCEPTANCE OF OR RECEIPT OF OR APPROVAL OF NEW MARKET RATE AND AFFORDABLE ROGO APPLICATIONS BEYOND Y33 Q2 THROUGH JANUARY 13TH, 2025, ROGO AWARDS BEYOND Y33 Q2, ROGO APPLICATION REVISIONS BEYOND JANUARY 13TH, 2025, REMAINING AFFORDABLE HOUSING ROGOS, ADMINISTRATIVE RELIEF ROGO AWARDS, AND APPLICATIONS FOR ADMINISTRATIVE RELIEF ROGOS AND/OR APPLICATIONS FOR ADMINISTRATIVE RELIEF ROGO AWARDS RECEIVED BEYOND JANUARY 13TH, 2025, UNTIL THE MONROE COUNTY BOARD OF COUNTY COMMISSIONERS CAN REVIEW AND POSSIBLY AMEND THE MONROE COUNTY LAND DEVELOPMENT CODE AND/OR COMPREHENSIVE PLAN REGARDING THE ALLOCATION AND PERMITTING OF RESIDENTIAL DEVELOPMENT; PROVIDING FOR EXPIRATION IN NO MORE THAN 365 DAYS OF THE DATE OF THIS EMERGENCY INTERIM DEVELOPMENT ORDINANCE OR WHEN THE COMPREHENSIVE PLAN AND LAND DEVELOPMENT CODE AMENDMENTS BECOME EFFECTIVE, WHICHEVER COMES FIRST; PROVIDING FOR SEVERABILITY; PROVIDING FOR TRANSMITTAL TO THE STATE LAND PLANNING AGENCY AND THE SECRETARY OF STATE; PROVIDING FOR AN EFFECTIVE DATE.

WHEREAS, the unincorporated Florida Keys constitute a countywide State-designated Area of Critical State Concern ("Florida Keys ACSC"), as established by and through Rule 28-29.002, Florida Administrative Code, and Sections 380.05 and 380.0552, Florida Statutes; and

WHEREAS, the enabling legislation for the designation of areas of critical state concern provide and hold as follows: "An area of critical state concern may be designated only for: An area containing, or having a significant impact upon, environmental or natural resources of . . . statewide significance, . . . the uncontrolled private or public development of which would cause substantial deterioration of such resources." Fla. Stat. § 380.05(2)(a); and

WHEREAS, pursuant to Section 380.0552(9)(a)(2.), Florida Statutes, all local comprehensive plans within the Florida Keys ACSC must include goals, objectives, and policies to protect public safety and welfare in the event of a natural disaster by maintaining a hurricane evacuation clearance time for the permanent residents of the Florida Keys of no more than 24 hours, the hurricane evacuation clearance time shall be determined by a hurricane evacuation study conducted in accordance with a professionally accepted methodology and approved by the state land planning agency ("Florida Department of Commerce"), and for purposes of hurricane evacuation clearance time:

a. Mobile home residents are not considered permanent residents.

b. The City of Key West Area of Critical State Concern established by Chapter 28-36, Florida Administrative Code, shall be included in the hurricane evacuation study and is subject to the evacuation requirements of this subsection; and

WHEREAS, in 2023, following the 2020 U.S. Census, the Florida Department of Commerce completed an update to the hurricane evacuation modeling task which included Baseline Modeling and, per the December 2023 Florida Keys Hurricane Evacuation Modeling Report (the "Report"), "**five additional scenarios (S1-S5)…that examined the effect of prospective building allocations, to facilitate discussion…to help inform future policy considerations that may be considered by state and local officials and stakeholders**"; and

WHEREAS, Table 3 from the Report, which summarized Hurricane Evacuation Clearance times for each scenario modeled, is attached hereto as Exhibit A.; and

WHEREAS, the Report's Scenario 4 ("S4") showed that 220 additional residential permit allocations would be the maximum that may be legally awarded without exceeding and violating the statutorily required 24-hour hurricane evacuation clearance timeline, distributed Keys-wide as follows: Unincorporated Monroe County: 100, Marathon: 40, Islamorada: 40, and Key West: 40 affordable; and

WHEREAS, Monroe County has begun the necessary steps to establish a new category of housing within the Monroe County Comprehensive Plan and Land Development Code, "Workforce Market Rate Housing", which would be limited to use and occupancy by those who derive at least 70 percent of their income as members of the Workforce in Monroe County, gainfully employed providing goods and/or services to Monroe County residents or visitors; and

WHEREAS, as was explained by the County's professional staff per the below, state law, as informed by the State of Florida's latest hurricane evacuation modeling, allows 220 residential building permit allocations to be granted to the County and municipalities without violating the 24-hour hurricane evacuation clearance time requirement enshrined at Section 380.0552, Florida Statutes, and Chapter 28-20, Florida Administrative Code, however that the State of Florida is uncomfortable issuing said 220 allocations at this time, as follows:

Monroe County Planning and Environmental Resources Department Senior Director Emily Schemper[1]: "Option 1, from last month, was to stay within the 24-hour evacuation maximum of 220 for all jurisdictions in the Keys. So this was [the Florida Department of] Commerce's modeled scenario that kept us within 24 hours, the maximum countywide was 220 units, 100 of those were modeled for unincorporated Monroe County, and then 40 each for Islamorada, Marathon, and Key West, as affordables for Key West. The chart below is a portion, it's the unincorporated County portion of a chart that we have been using to communicate with the State about the need for the 220 units or the 100 for Monroe County, and it shows how . . . Our current allocations here that are remaining are set to run out at the end of Quarter 2 of 2026. So the red bar starts where we're out of our normal market rate allocations. We do of course have 12 affordable housing and 144 administrative relief [allocations] and 214 early evacuation [allocations] that are, or, hopefully soon will be available, for those types of housing. But those are not your general ROGO allocations that your normal everyday applicant for a housing unit is applying for. In pink at the bottom here, if the County were to receive our 100 units from the 220, we would hopefully start those up right after our normal allocations run out, and if we continue at the same rate of distribution as today, it would take us through about a year and a half, almost two years, of additional out-time for allocations, before we would then run out of those.

. . .

The next two slides are basically a summary of what's been happening over the last week. . . . The County of course requested, through a letter to the State [of Florida], that they approve the 220 units that are already included in the 24-hour evacuation timeframe per their model. We sent that letter in October, staff met with Commerce in October, got positive feedback regarding workforce housing especially. Our request was very specific to match the modeling they had already done to be able to say 'Yes, per your model, this shows 24 hours, no need to change the statute.' That was 100 for unincorporated Monroe County, 40 each for Islamorada and Marathon, and Key West. The Key West units were very specific that they would be affordable. And our original intent then was to get approval from the Administration Commission and then we would process Comprehensive Plan amendments. That's what happened with the 1,300 early evacuation [allocation units]. It [i.e., the category of 1,300 early evacuation allocations] was approved by the Administration Commission, and then each jurisdiction processed their local amendments to accept them and figure out how to give them out.

. . .

[1] A.I.C.P. (American Institute of Certified Planners – Certified Planner), C.F.M. (Association of State Floodplain Managers (A.S.F.M.) – Certified Floodplain Manager (C.F.M.)).

Staff has now been told by the State [of Florida] they are not in favor of even approving those 220 units until all remaining allocations, including administrative relief, have been expended.

. . .

The State [of Florida] also told staff that would like the County to give a portion of the County's remaining market rate allocations, which we have stretched out through 2026, and kept in our administrative relief pool, to Marathon and Islamorada who have a more urgent 'need' for units. Staff was very clear with [the State of Florida] that staff would not support something like this, because of the long-term liability that the County has. We [the County] have been looking ahead, planning, for *this*. And have tried to be strategic. We did agree to put this request in front of the Board though, because they were asking.

Another thing the State requested is that, and this is a little confusing: That the County proceed with a Comprehensive Plan amendment to accept our share of the 220 (100 Monroe County allocations) because the Administration Commission is not planning to approve it, but they said 'proceed with your Comprehensive Plan amendment.' What that would do is basically force a decision from the State; they did not say it this way, but when we transmit that [Comprehensive Plan] amendment to Florida Commerce, they need to review it and decide if it's consistent with Florida Statute. So staff's in favor of that, we should do what they said, and move forward with that Comprehensive Plan amendment if you want those 100 units, and we'll see how it plays out. That leads me to specific things we're requesting direction on today.

So number one would be to begin processing that Comprehensive Plan and also a Code amendment to accept our 100 ROGOs.

And then number two, given that the State is saying they're not in favor of even giving the 220 without us expending all of our units, staff's recommendation and request would be that we bring back to you on December 19 a moratorium through an emergency interim development ordinance, that we put a hold on issuing any more ROGO allocations or taking in any more ROGO applications, it would last about a year while we process amendments that also take our remaining allocations – market rate, and administrative relief – and stretch those out for a longer time-frame.

If we skip the moratorium and just process an amendment like that it would take a year to complete and at that point we would only have about 30 market rate units left to stretch out.

So that's why we're requesting a moratorium: Put everything on hold for about a year, the numbers would be (by the time we get to it) about 108 market rate, plus our 144 administrative relief, so a total of 252 [allocations], [and] if we stretched

those out at 40 per year (which again we're trying to stay within the comfort zone but make it as low as possible), 40 per year, that would bring us past the next Census, which is good because there may be more new information and modeling then, it would bring us into about 2032.

We would of course still have our 12 affordable, and once our amendment goes through with the 214 early evacuation, we could still continue to issue those if there are projects ready to go.

But this [moratorium] would be for the market rates and also administrative relief.

At the same time we would be processing that Comprehensive Plan amendment to accept an additional 100 [allocations] that stay within the 24 hours. If that gets accepted [by the State of Florida], then we could modify this timeline, either add to it, or add more years on the end, we can work on that. But our request would be that we take immediate action to protect ourselves if worst case scenario we're not getting any more units at all."

See Monroe County Board of County Commissioners Meeting (Dec. 11, 2024).

WHEREAS, Monroe County policies and regulations adopted in the Monroe County Comprehensive Plan and Land Development Code are to maintain the public health, safety, and welfare of the citizens of the Florida Keys and to strengthen our local capability to responsibly manage land use and development; and

WHEREAS, the Monroe County Comprehensive Plan requires that all "development" must be consistent with the State of Florida's statutory Principles for Guiding Development in the Florida Keys Area of Critical State Concern. *Introduction*, Monroe County Comprehensive Plan ("[A]ll planning and development within the Florida Keys must be consistent with Sections 380.05 and 380.0552(7), F.S., Principles for Guiding Development."). Accordingly, "development" in Monroe County must be consistent with the following Principles for Guiding Development in the Florida Keys Area of Critical State Concern:

(g) Protecting the historical heritage of the Florida Keys.

(l) Making available adequate affordable housing for all sectors of the population of the Florida Keys.

(n) Protecting the public health, safety, and welfare of the citizens of the Florida Keys and maintaining the Florida Keys as a unique Florida resource.

Fla. Stat. §§ 380.0552(7)(g), (l), and (n).

WHEREAS, the statutorily adopted State Comprehensive Plan's Goals and Policies, which provide(s) basic policy direction to all levels of government concerning

"the orderly social, economic, and physical growth of the state", similarly direct(s) the State and Monroe County to conduct their growth management framework and regulatory activities as follows:

(4)(a) HOUSING.– *Goal*.– The public and private sectors shall increase the affordability and availability of housing for low-income and moderate-income persons, including citizens in rural areas, while at the same time encouraging self-sufficiency of the individual and assuring environmental and structural quality and cost-effective operations.

(4)(b)(3.) *Policies*.– Increase the supply of safe, affordable, and sanitary housing for low-income and moderate-income persons and elderly persons by alleviating housing shortages, recycling older houses and redeveloping residential neighborhoods, identifying housing needs, providing incentives to the private sector to build affordable housing, encouraging public-private partnerships to maximize the creation of affordable housing, and encouraging research into low-cost housing construction techniques, considering life-cycle operating costs.

(5)(b)(2.)(c.) HEALTH.– *Policies*.– Government shall ensure that future growth does not cause the environment to adversely affect the health of the population.

(6)(a) PUBLIC SAFETY.– *Goal*.– Florida shall protect the public by preventing, discouraging, and punishing criminal behavior, lowering the highway death rate, and protecting lives and property from natural and manmade disasters.

(6)(b)(22.) *Policies*.– Require local governments, in cooperation with regional and state agencies, to prepare advance plans for the safe evacuation of coastal residents.

(6)(b)(23.) *Policies*.– Require local governments, in cooperation with regional and state agencies, to adopt plans and policies to protect public and private property and human lives from the effects of natural disasters.

(15) LAND USE.– *Goal*.– In recognition of the importance of preserving the natural resources and enhancing the quality of life of the state, development shall be directed to those areas which have in place, or have agreements to provide, the land and water resources, fiscal abilities, and service capacity to accommodate growth in an environmentally acceptable manner.

(15)(b)(1.) *Policies*.– Promote state programs, investments, and development and redevelopment activities which encourage efficient development and occur in areas which will have the capacity to service new population and commerce.

Fla. Stat. §§ 187.101(1), 187.201(4)(a), 187.201(4)(b)(3.), 187.201(5)(b)(2.)(c.), 187.201(6)(a), 187.201(6)(b)(22.), 187.201(6)(b)(23.), 187.201(15), and 187.201(15)(b)(1.).

WHEREAS, the legislative intent of the Florida Keys Area Protection Act include(s):

(b) Establish a land use management system that conserves and promotes the community character of the Florida Keys.

(d) Provide affordable housing in close proximity to places of employment in the Florida Keys.

(e) Establish a land use management system that promotes and supports a diverse and sound economic base.

(j) Ensure that the population of the Florida Keys can be safely evacuated.

Fla. Stat. §§ 380.0552(2)(b), (d), (e), and (j).

WHEREAS, the Monroe County Board of County Commissioners finds, concludes, and adopts as the basis for, intent and purpose of the adoption of this ordinance the local and state laws of Monroe County and Florida cited and memorialized at the above and foregoing first, second, seventh, ninth, tenth, eleventh, and twelfth prefatory recitals to this ordinance; and

WHEREAS, the Monroe County Board of County Commissioners concurs with, approves, and adopts as the basis for, intent and purpose of the adoption of this ordinance the considered analysis and explanation articulated by Monroe County professional staff cited and memorialized at the above and foregoing eighth prefatory recital to this ordinance; and

WHEREAS, the above and foregoing prefatory recitals to this ordinance setting forth the express basis for, intent and purpose of adoption of this ordinance constitute a non-exhaustive list of the conceivable rational and legitimate reasons for the adoption of this ordinance; and

WHEREAS, an ordinance addressing the interim time period between the current adopted Land Development Code and Comprehensive Plan and the adoption of any new amendment(s) is necessary to ensure that any new Comprehensive Plan and Code requirements are fully and responsibly evaluated to ensure the public health, safety, and welfare of the citizens of unincorporated Monroe County; and

WHEREAS, the Monroe County Board of County Commissioners hereby finds and concludes that all of these foregoing bases for and that the intent and purpose of adopting this ordinance accordingly has an eminent foundation in reason and has a substantial relation to the public health, public safety, and the public welfare; and

WHEREAS, the Monroe County Board of County Commissioners hereby finds and concludes that, therefore, there is an eminently rational relationship between the

adoption of this ordinance and conceivable legitimate governmental objective(s) and that such finding and conclusion is not beyond fair debate; and

WHEREAS, the Monroe County Board of County Commissioners hereby finds and concludes that the finite moratorium enumerated herein is rationally related to the County's sensible and prudent attempt to preserve the status quo while it formulates and/or works toward adoption of regulatory land use framework amendments during said moratorium; and

WHEREAS, "[i]t is well-settled that permissible bases for land use" regulations "include concern about the effect of" development "on traffic, on congestion, on surrounding property values, on demand for" local public "services, and on other aspects of the general welfare. It is" further "within the power of the [local] legislature to determine that the community should be beautiful as well as healthy, spacious as well as clean, well-balanced as well as carefully patrolled." *WCI Communities, Inc. v. City of Coral Springs*, 885 So. 2d 912, 915 (Fla. 4th DCA 2004);

WHEREAS, "temporary moratoria are widely used among land-use planners to preserve the status quo while formulating a more permanent development strategy[.]" *WCI Communities, Inc.*, 885 So. 2d at 915-16 (Fla. 4th DCA 2004) (internal citation omitted); and

WHEREAS, Monroe County desires to impose a temporary moratorium upon certain development, development applications, and/or activities and/or applications associated with development as described more particularly in the title of this ordinance and further below, due to pending quasi-legislative policy formulation and/or policy adoption more particularly described at the above first, second, seventh, eighth, ninth, tenth, eleventh, and twelfth prefatory recitals to this ordinance;

NOW, THEREFORE, BE IT ORDAINED BY THE BOARD OF COUNTY COMMISSIONERS OF MONROE COUNTY, FLORIDA:

Section 1. **Recitals.** The foregoing recitals, findings of fact, statements of local quasi-legislative purpose and intent, and conclusions of law are true and correct and are hereby incorporated as if fully stated herein.

Section 2. **Emergency Declaration.** Pursuant to subsection (4) of Section 125.66, Florida Statutes, the Board of County Commissioners of Monroe County, Florida, declare that the above-stated recitals constitute an emergency that justifies waiving the requirement to issue a notice of intent to adopt an ordinance in subsection (2) and dispensing with the publication of a business impact statement required by subsection (3).

Section 3. **Moratorium Imposed.** Monroe County professional staff shall defer the acceptance of, receipt of, and/or approval of market rate ROGO ("Rate of Growth Ordinance") applications, commencing December 19, 2024, until

the Board can review and possibly amend the Monroe County Land Development Code and/or Comprehensive Plan regarding the allocation and permitting of residential development. This temporary moratorium shall be applied and enforced as more particularly enumerated below:

(a) New ROGO Applications for market rate and/or affordable allocations will continue to be received and accepted for ROGO Year 33, Quarter 2, per normal established procedures through the quarter's closing date, which is January 13th, 2025.
(b) No new ROGO Applications for market rate and/or affordable allocations will be received or accepted following the closing date of ROGO Year 33, Quarter 2, which is January 13th, 2025.
(c) No Revisions of ROGO Applications will be received or accepted following the closing date of ROGO Year 33, Quarter 2, which is January 13th, 2025.
(d) ROGO Awards for market rate and/or affordable allocations for ROGO Year 33, Quarter 2 will be considered and approved by the Planning Commission, as per normal distribution schedule.
(e) No ROGO Awards for market rate and/or affordable allocations will be considered or approved for ROGO Year 33, Quarter 3 or any quarter that follows, until the temporary moratorium expires.
(f) No new applications for Administrative Relief will be received or accepted following the closing date of ROGO Year 33, Quarter 2, which is January 13th, 2025.
(g) Applications for Administrative Relief received and accepted prior to January 13th, 2025, will be processed according to normal procedures during the temporary moratorium.
(h) ROGO Applications that become eligible for Administrative Relief during the temporary moratorium will be notified of eligibility upon expiration of the temporary moratorium and given the opportunity to submit an Administrative Relief application at that time.
(i) No new Reservations of affordable ROGO allocations shall be approved by the BOCC after January 13th, 2025. Extensions of existing Reservations may be approved by the BOCC during the temporary moratorium.
(j) Current, previously submitted and accepted ROGO Applications shall continue to accrue perseverance points during the temporary moratorium, per the adopted rate of accrual for each particular application.
(k) Property owners may continue to submit Building Permit applications for new dwelling units during the temporary moratorium. However, in the event that the Florida Building Code and/or a FEMA flood insurance rate map (FIRM) is amended during the temporary moratorium, if necessary, the applicant shall submit plan revisions to the building permit application demonstrating full compliance with the current Florida Building Code and the adopted FIRM in effect.

(l) Building permit applications that are reviewed during the temporary moratorium and determined to be "ready" to submit a ROGO application shall be given 180 days following expiration of the moratorium to submit the ROGO application. If no ROGO application is submitted within this timeframe, the building permit application is subject to expiration unless an extension is obtained from the Building Official.

(m) Building permit applications for which the deadline to submit a ROGO application falls within the temporary moratorium will be given a new deadline of 180 days following expiration of the moratorium to submit the ROGO application.

Section 4. **Temporary Nature of Moratorium.** This moratorium is temporary and shall automatically expire after 365 days' passage following the adoption of this Ordinance or shall automatically expire when all above-referenced forthcoming Land Development Code and Comprehensive Plan amendments have been fully and finally adopted, whichever occurs first. In no event shall the moratorium imposed by this ordinance extend beyond 365 days from the adoption of this Ordinance. This Section does not foreclose the right and power of the Board to extend this temporary moratorium in order to effectuate the adoption and legal effectiveness of the above-referenced Land Development Code and Comprehensive Plan amendments in progress.

Section 5. The Monroe County Board of County Commissioners finds and concludes that approval of this ordinance in fact and law will benefit the health, safety, and welfare of the public at large.

Section 6. **Inconsistency, Partial Invalidity, Severability, and Survival of Provisions.** If any provision of this Ordinance, or part or any portion thereof, is held to be invalid or unenforceable in or by any administrative hearing officer or court of competent jurisdiction, the invalidity or unenforceability of such provision, or any part or portion thereof, shall neither limit nor impair the operation, enforceability, or validity of any other provision of this Ordinance, or any remaining part(s) and/or portion(s) thereof. All other provisions of this Ordinance, and remaining part(s) and/or portion(s) thereof, shall continue unimpaired in full force and effect.

Section 7. **Captions and Paragraph Headings.** Captions and paragraph headings, where used herein, are inserted for convenience only and are not intended to descriptively limit the scope and intent of the particular paragraph or text to which they refer.

Section 8. **Conflicting Provisions.** All ordinances or parts of ordinances in conflict with this Ordinance are hereby repealed to the extent of said conflict. The

repeal of an ordinance herein shall not repeal the repealing clause of such ordinance or revive any ordinance which has been repealed thereby.

Section 9. **Transmittal.** This Ordinance shall be transmitted to the Florida State Land Planning Agency pursuant to Chapter 163 and 380, Florida Statutes.

Section 10. **Effective Date.** This Ordinance shall become effective as provided by the general law requirements for ordinance adoption within the Florida Keys Area of Critical State Concern enumerated at Chapters 163 and 380, Florida Statutes.

PASSED AND ADOPTED by the Board of County Commissioners of Monroe County, Florida, at a regular meeting held on this 19th day of December, 2024.

Mayor James K. Scholl, District 3	_____
Mayor *Pro Tem* Michelle Lincoln, District 2	_____
Commissioner Craig Cates, District 1	_____
Commissioner Holly Merrill Raschein, District 5	_____
Commissioner David Rice, District 4	_____

By: _____
Mayor James Scholl

(SEAL)

MONROE COUNTY ATTORNEY
APPROVED AS TO FORM
_____
PETER MORRIS
ASSISTANT COUNTY ATTORNEY
Date: 12/16/24

ATTEST: KEVIN MADOK, CLERK

_____
AS DEPUTY CLERK

COUNTY of MONROE
The Florida Keys

BOARD OF COUNTY COMMISSIONERS
Mayor James K. Scholl, District 3
Mayor Pro Tem Michelle Lincoln, District 2
Craig Cates, District 1
David Rice, District 4
Holly Merrill Raschein, District 5

Special Board of County Commissioners Meeting Meeting
December 19, 2024
Agenda Item Number: B2
2023-3444

BULK ITEM: No **DEPARTMENT:** Planning & Environmental Resources

TIME APPROXIMATE: **STAFF CONTACT:** Emily Schemper

AGENDA ITEM WORDING: Consideration of a Resolution Requesting That The State of Florida Approve Additional Rate of Growth Ordinance (ROGO) Permit Allocations for Unincorporated Monroe County, Following an Analysis of Vacant Privately-Owned Land, Risk of Takings Liability, Workforce and Affordable Housing Considerations, and Considering Hurricane Evacuation Timeframe Requirements.

ITEM BACKGROUND:
In 2023, following the 2020 U.S. Census, the State of Florida Department of Commerce ("FL Commerce") completed an update to the State's hurricane evacuation modeling which included Baseline Modeling and, per the December 2023 Florida Keys Hurricane Evacuation Modeling Report (the Report), "**five (5) additional scenarios (S1-S5) that examine the effect of prospective building allocations, to facilitate discussion…to help inform future policy considerations that may be considered by state and local officials and stakeholders**." Scenario 4 of the modeling indicated that an additional 220 residential permit allocations Keys-wide was the maximum that could be legally awarded without exceeding and violating the statutorily required (Section 380.0552, Florida Statutes) 24-hour hurricane evacuation timeline for the permanent residents of the Florida Keys. Monroe County officially requested the 220 units through Commerce and Commerce has directed the County complete a comprehensive plan amendment to request 100 of the 220 units. The BOCC gave direction to staff to process a comprehensive plan amendment on December 11, 2024.

During a meeting with Commerce, as well as during discussions with the Office of the Governor, state officials indicated a desire for Monroe County to focus on providing workforce housing.

Over the past year, Monroe County's staff were directed to pursue data collection and analysis, stakeholder input, community education and outreach, and public discussions regarding environmental concerns, infrastructure capacity/concurrency, possible takings liability, and public safety concerns regarding hurricanes and safe/timely hurricane evacuation. This process was intended to provide the Board of County Commissioners with the necessary information to make a decision/recommendation on the future of ROGO and whether the BOCC should itself request a change, through legislation, to the statutorily required 24-hour hurricane evacuation time-frame in order to make it legal to build

additional residential development.

The attached draft resolution may be finalized to memorialize whether the BOCC recommends proposing additional residential units and/or another timeframe to evacuate the Florida Keys in the event of a hurricane following discussion at the December 19, 2024 Special Meeting.

Further, attached is a definition of Workforce Housing, which staff will incorporate into the Comprehensive Plan amendments moving forward with the comprehensive plan amendment to request the 100 of the 220 allocations.

Staff have also been directed to process a comprehensive plan amendment to require the Land Authority to pay up to 150% of appraised value for administrative relief, in an effort to incentivize permit applicants to sell their lots and to cover additional expenses of design, permitting and processing of permits.

Marathon, Key West, and Islamorada have requested additional units and/or an increase in the number of hours Florida Statute requires all permanent residents can evacuate within. Attached is a table that shows what each community requested. Marathon, Key West, and Islamorada resolutions are attached.

PREVIOUS RELEVANT BOCC ACTION:
On November 20, 2024, the BOCC directed staff to proceed with Comprehensive Plan and Land Development Code amendments to request/accept the County's portion (100 units) of the 220 additional ROGO units that would be the maximum that could be awarded without exceeding general law's 24-hour required evacuation timeline, per Scenario 2 of the December 2023 Florida Keys Hurricane Evacuation Modeling Report.

INSURANCE REQUIRED:
No

CONTRACT/AGREEMENT CHANGES:
N/A

STAFF RECOMMENDATION: If the Board of County Commissioners ("BOCC") desires additional ROGO units beyond the 220 units (100 for Monroe County) that would be the maximum that could be legally awarded without exceeding and violating the statutorily required 24-hour hurricane evacuation timeline, County professional staff request the BOCC to indicate to the State its desired number of additional ROGO units and/or hurricane evacuation timeframe and/or distribution term.

DOCUMENTATION:

Workforce Market Rate Housing proposed definition.pdf
evacuation-modeling-report-final-with-appendices FL COMMERCE.pdf
Exhibit A to Resolution - Clearance Times Summary Table
Islamorada 24-12-134 Additional BPAS Recommendation.pdf
Marathon Resolution 2024-125 for 26 hours.pdf
Draft_Resolution_Requesting_Additional_ROGO_Allocations_v4.docx
Key West Res. 24-320 Stating BPAS Intent.pdf
KW-MAR-ISL-UNI to date.pdf

FINANCIAL IMPACT:
N/A

EXISTING LAND DEVELOPMENT CODE DEFINITIONS

LDC Section 101-1

Workforce means individuals or families who are gainfully employed supplying goods and/or services to Monroe County residents or visitors.

Workforce housing means dwelling units for those who derive at least 70 percent of their income as members of the Workforce in Monroe County and who meet the affordable housing income categories of the Monroe County Code. Workforce housing shall be interchangeable with the terms detached or attached dwellings, employee housing or commercial apartments included in the land use districts and shall be a permitted use in all land use districts where detached dwelling, attached dwellings, employee housing or commercial apartments are included as a current permitted use. An applicant choosing to develop workforce housing is subject to the requirements of Chapter 139 and all other requirements included in the land development code, including but not limited to, density, parking, bufferyards, access, etc.

DRAFT PROPOSED DEFINITON

Workforce market rate housing means dwelling units for those who derive at least 70 percent of their income as members of the Workforce in Monroe County. Workforce market rate housing shall be interchangeable with the terms detached or attached dwellings, or commercial apartments included in the land use districts and shall be a permitted use in all land use districts where detached dwelling, attached dwellings, or commercial apartments are included as a current permitted use. An applicant choosing to develop workforce market rate housing shall be subject to a deed restriction limiting occupancy to members of the workforce for a period of 99 years, and shall comply with all other requirements included in the land development code, including but not limited to, density, parking, bufferyards, access, etc.

FLORIDACOMMERCE

STATE OF FLORIDA

Florida Keys Hurricane Evacuation Modeling Report

DECEMBER 2023

December 8, 2023

The Honorable Ron DeSantis
Governor of Florida
The Capitol
400 South Monroe Street
Tallahassee, FL 32399

The Honorable Jimmy Patronis
Chief Financial Officer
The Capitol
400 South Monroe Street
Tallahassee, Florida 32399

The Honorable Ashley Moody
Attorney General
The Capitol
400 South Monroe Street
Tallahassee, FL 32399

The Honorable Wilton Simpson
Commissioner of Agriculture
The Capitol
400 South Monroe Street
Tallahassee, Florida 3239

Dear Governor and Members of the Administration Commission:

Section 380.0552(9)(a)2., Florida Statutes, requires that the local governments within the Florida Keys Area of Critical State Concern establish goals, objectives, and policies that "protect public safety and welfare in the event of a natural disaster by maintaining a hurricane evacuation clearance time for permanent residents of no more than 24 hours."

FloridaCommerce, in its capacity as the state land planning agency, assists the local governments in meeting this statutory requirement by updating the data for the Florida Keys Evacuation Model as professionally acceptable sources of information are released pursuant to Administration Commission rules. With new census information recently available, and the close of a 10-year building permit allocation planning horizon initiated in 2013 ending in 2023, FloridaCommerce has facilitated new baseline modeling scenarios and data gathering.

FloridaCommerce recognized early on that community engagement and facilitating public feedback is essential to this process. In June, the FloridaCommerce team traveled to the Florida Keys to hold public workshops and meet with leadership from Monroe County and the Florida Keys local governments, including the City of Key West, Village of Islamorada, City of Marathon, City of Key Colony Beach, and the City of Layton. The workshops were publicly noticed and live streamed in coordination with Monroe County, and all citizens who attended were given an opportunity to provide input. Recordings and copies of all public comments received are available online at FloridaJobs.org/FLKeysEvac.

In addition to the public workshops, the FloridaCommerce team facilitated several meetings and briefings with state leadership and executive agencies, including the Governor's Office, Attorney's General's Office, Commissioner of Agriculture's Office, Office of the Chief Financial Officer, Florida Division of Emergency Management, the Florida Department of Business and Professional Regulation, and the Florida Department of Transportation. The agency also held

An equal opportunity employer/program. Auxiliary aids and service are available upon request to individuals with disabilities. All voice telephone numbers on this document may be reached by persons using TTY/TTD equipment via the Flori Relay Service at 711.

several briefings throughout the year with local legislators and received data from the U.S. Navy and Smith Travel Research Group.

These meetings, along with the public workshops, helped ensure feedback regarding various public safety, infrastructure, environmental, and housing impacts was considered as part of the overall baseline modeling process facilitated in partnership with a nationally recognized expert. By November, the FloridaCommerce team had concluded its baseline modeling research, and publicly presented the baseline modeling results to Keys Local Governments and citizens through two publicly noticed webinars. The agency allowed for questions to be submitted by members of the public for answers by subject matter experts. Recordings and materials from these webinars are also available online at FloridaJobs.org/FLKeysEvac.

The enclosed report contains the results of FloridaCommerce's 2023 Florida Keys Hurricane Evacuation Modeling Study, as well as a thorough summary of our agency's robust community and stakeholder engagement efforts and all materials shared over the course of this year. The report also includes a history of managed growth in the Florida Keys and additional research to help inform future policy decisions that may be considered by state and local officials.

Sincerely,



J. Alex Kelly

Contents

Executive Summary 2
About the Florida Keys 4
Areas of Critical State Concern within the Florida Keys 4
A History of Managed Growth in the Florida Keys 5
Building Permit Allocation System 5
Work Program 5
Memorandum of Understanding 6
Hurricane Evacuation Modeling Overview 7
2012 Evacuation Modeling 7
Figure 1 8
2023 Evacuation Modeling 9
2023 Community Engagement and Public Comments 11
2023 Baseline Modeling Results 13
Table 1 13
Table 2 14
2023 Prospective Modeling to Inform Future Policy Considerations 15
Table 3 15
Heat Maps 17
Figure 2 17
Figure 3 18
Figure 4 19
Figure 5 20
Figure 6 21
Study Summary & Policy Considerations 22
Study Summary 22
Policy Considerations 22
Table 4 – Possible Paths Forward Across Multiple Policy Considerations 24
Appendix 25

Executive Summary

Pursuant to section 380.032 of the Florida Statutes, FloridaCommerce, in its capacity as the state land planning agency, is responsible for overseeing the administration and enforcement of areas of critical state concern throughout the State of Florida, including the Florida Keys Area of Critical State Concern and the Key West Area of Critical State Concern. Additionally, section 380.0552(9)(a)2., Florida Statutes (F.S.), requires that the local governments within the Florida Keys Area of Critical State Concern establish goals, objectives, and policies that "protect public safety and welfare in the event of a natural disaster by maintaining a hurricane evacuation clearance time for permanent residents of no more than 24 hours."

Within the Florida Keys, land development and growth have been tethered to this statutory 24-hour clearance time of permanent residents. In 2012, at the direction of the Administration Commission, a hurricane evacuation study was conducted to model the statutory 24-hour clearance time and implement a 10-year planning horizon (2013-2023) for managed growth in the Florida Keys. A Memorandum of Understanding (MOU) was entered into between FloridaCommerce, the Florida Division of Emergency Management, and local governments in the Florida Keys at the direction of the Administration Commission.

The MOU established a maximum issuance of 3,550 building permits over a 10-year period to be distributed to local governments in the Florida Keys. Local governments subsequently amended their local comprehensive plans and associated land development regulations to reflect the revised allocations established in the MOU. The 10-year planning horizon initiated by the MOU ends in 2023. Additionally, pursuant to Administration Commission rules, FloridaCommerce is required to update the Hurricane Evacuation Modeling as new data becomes available. That new data became available to the state of Florida through the 2020 United States Census and American Community Survey, coinciding with the end of the 10-year planning horizon.

FloridaCommerce recognized early on that community engagement and facilitating public feedback is essential to this process. In June 2023, the FloridaCommerce team traveled to the Florida Keys to hold public workshops and meet with leadership from Monroe County and the Florida Keys local governments, including the City of Key West, Village of Islamorada, City of Marathon, City of Key Colony Beach, and the City of Layton. The workshops were publicly noticed and live streamed in coordination with Monroe County, and all citizens who attended were given an opportunity to provide input. Recordings and copies of all public comments received are available online at FloridaJobs.org/FLKeysEvac.

In addition to the public workshops, the FloridaCommerce team facilitated several meetings and briefings with state executive agencies and Florida Cabinet aides this year, including the Governor's Office, Attorney's General's Office, Commissioner of Agriculture's Office, Office of the Chief Financial Officer, the Florida Division of Emergency Management, the Florida Department of Business and Professional Regulation, and the Florida Department of Transportation. The agency also held several briefings throughout the year with local legislators and received data from the U.S. Navy and Smith Travel Research Group.

These meetings, along with the public workshops, helped ensure feedback regarding various public safety, infrastructure/environmental, and housing impacts were considered as part of the overall baseline modeling process facilitated in partnership with a nationally recognized expert. By November 2023, the FloridaCommerce team had concluded its baseline modeling research, and publicly presented the baseline modeling results through two publicly noticed webinars open to Keys Local Governments and citizens. The agency allowed for questions to be submitted by members of the public for answers by subject matter experts. Recordings and materials from these webinars are also available online at FloridaJobs.org/FLKeysEvac.

The enclosed report contains the results of FloridaCommerce's 2023 Florida Keys Hurricane Evacuation Modeling Study, as well as a thorough summary of our agency's robust community and stakeholder engagement efforts and all materials shared over the course of this year. The report also includes a history of managed growth in the Florida Keys and additional research to help inform future policy decisions that may be considered by state and local officials.

The intention of this report is not to provide recommendations for future policy decisions, but rather, to give options and considerations for Keys residents, the Legislature, and the Administration Commission to help ensure the continued safety and well-being of Florida Keys residents for generations to come.

About the Florida Keys

The Florida Keys are a chain of lushly vegetated tropical islands surrounded by clear shallow ocean waters teeming with sea life, situated between the Gulf of Mexico and Atlantic Ocean at the southernmost point of the state of Florida and Continental United States. Renown across the world for their natural beauty and magnificent ecosystems, balancing the unique needs of the environment, quality of life for residents and visitors, and ensuring public safety alike are essential for responsible management of the Florida Keys.

Access to and from the Keys is primarily by the narrow ribbon of U.S. Highway 1, stretching 125 miles and spanned by 19 miles of bridges. For many, driving on U.S. 1 is a memorable experience, with motorists and passengers surrounded by sparkling waters as far as the eye can see. However, this unique roadway also requires special consideration for another reality of living in paradise – hurricanes and evacuations. Timely evacuation of the Keys' population in advance of a hurricane strike is essential for public safety. The Florida Keys are isolated from the rest of the state and receive electricity and potable water from Florida City, located on the Florida mainland. There are currently no hurricane shelters available in the Florida Keys for residents to safely evacuate to in the event of a hurricane designated as a Category 3 or greater.

Areas of Critical State Concern within the Florida Keys

Areas of Critical State Concern are governed by Chapter 380 of the Florida Statutes and specific rules established by the Administration Commission. There are two areas of critical state concern that are located within the Florida Keys: the Florida Keys Area of Critical State Concern and the Key West Area of Critical State Concern.

The Florida Keys Area of Critical State Concern includes unincorporated Monroe County and the municipalities of Layton, Islamorada, Marathon, and Key Colony Beach. Section 380.0552, F.S., and Administration Commission Rules under Chapter 28 of the Florida Administrative Code (F.A.C.) govern the Florida Keys Area of Critical State Concern.[1]

The Key West Area of Critical State Concern is a separate designation from the Florida Keys Area of Critical State Concern and was established for property within the boundary of the City of Key West. The Key West Area of Critical State Concern is subject to the general requirements of areas of critical state concern under Chapter 380 of the Florida Statutes and Administration Commission Rules 28-36 and 28-37 of the F.A.C.

Both the Florida Keys Area of Critical State Concern and the Key West Area of Critical State Concern were created for the purposes of establishing a managed growth system throughout the Florida Keys in a manner that would protect the natural environment, history, and community character of the Keys while also balancing interests of private property owners and promoting land acquisition and protection strategies for environmentally sensitive lands.

[1] The Administration Commission rules establish land planning regulations and work program tasks for each municipality located within the Florida Keys Area of Critical State Concern. The City of Marathon is subject to Rule 28-18, the Village of Islamorada is subject to Rule 28-19, Monroe County is subject to Rule 28-20, and Key Colony Beach is subject to 28-21 of the F.A.C.

A History of Managed Growth in the Florida Keys

The designation of the Keys as areas of critical state concern assisted in establishing a system of managed growth that has evolved over the past several decades. This system of managed growth has been achieved through the use of comprehensive land planning initiatives, such as the implementation of rate of growth ordinances (ROGOs) by establishing Building Permit Allocation Systems (BPAS). The main purpose of this system of managed growth is to facilitate the safe evacuation of the residents and visitors of the Florida Keys in the event of a hurricane.[2] ROGOs are codified in the local governments' comprehensive plans and/or Land Development Regulations (LDRs), and the BPAS application and awarding process is outlined in each local governments' comprehensive plans and/or LDRs.

Building Permit Allocation System

ROGO is used to help manage the growth and development of the Florida Keys and BPAS was created to implement ROGO. Local governments within the Florida Keys, except for the City of Key Colony Beach, have limited residential growth through BPAS. BPAS establishes an annual cap on new residential development to ensure the ability of the population of the Florida Keys to safely evacuate.

BPAS is a permit allocation system where residential and commercial building projects must apply and compete for a limited number of building permits each year. In other words, BPAS is a competitive process that uses a rating system to award building permits to BPAS applicants. The applications with the highest scores are awarded a building permit on a limited basis each year.

Marathon, Islamorada, and Monroe County have implemented BPAS based on the maximum number of building permits that may be allocated over a 10-year period, as determined by Administration Commission rules[3]. The cities of Layton and Key West established the number of available allocations through their adopted comprehensive plans.

Work Program

In 2011, the Administration Commission promulgated rules formally establishing the Florida Keys Work Program to implement section 380.0552, F.S. Since 2011, by November 30th of each year, FloridaCommerce presents an annual report summarizing updates to the Governor and Cabinet regarding the milestones and tasks associated with the work program. The report includes the Village of Islamorada, the City of Marathon, and Monroe County work program tasks addressed in detail, the requirements of each local government to achieve environmental and water quality improvements, as well as goals for land acquisition and hurricane evacuation. Under the direction

[2] In 2011, the Legislature created Section 380.0552(9)(a)2., F.S. to ensure that "… [a]mendments to local comprehensive plans in the Florida Keys Area must also be reviewed for compliance with the following … 2. Goals, objectives, and policies to protect public safety and welfare in the event of a natural disaster by maintaining a hurricane evacuation clearance time for permanent residents of no more than 24 hours. The hurricane evacuation clearance time shall be determined by a hurricane evacuation study conducted in accordance with a professionally accepted methodology and approved by the state land planning agency." *Emphasis added.*

[3] Since 2012, some local governments have amended their comprehensive plans to extend the planning horizon longer than 10 years, reducing the amount of allocations issued per year. However, each local government retained their original number of allocations.

of Governor DeSantis, the Work Programs for Islamorada, Marathon, and Monroe County were updated again in 2020 to implement a canal restoration program.

Memorandum of Understanding

Included in the Work Program are several tasks related to hurricane evacuation modeling and establishing a build-out analysis. The first of these tasks required FloridaCommerce to enter into an MOU with the Florida Division of Emergency Management and local governments in the Florida Keys. The MOU specified the input variables and assumptions for utilizing evacuation models to accurately depict evacuation clearance times for the population of the Florida Keys. The Administration Commission rules further provided that FloridaCommerce utilize the variables and assumptions in the model to complete a build-out analysis and determine clearance times.

Hurricane Evacuation Modeling Overview

Computer modeling is used to estimate the maximum number of vehicles and people that can be evacuated within the established 24-hour clearance time criteria. In 2012, as part of the MOU, FloridaCommerce facilitated the first hurricane evacuation study to model the statutory 24-hour clearance time and implement a 10-year planning horizon (2013-2023) for managed growth in the Florida Keys through the MOU.

The MOU also established a maximum issuance of 3,550 building permits over a 10-year period to be distributed to local governments in the Florida Keys. Local governments amended their local comprehensive plans and associated LDRs to reflect the revised allocations established in the MOU. The 10-year planning horizon initiated by the MOU ends in 2023.

Additionally, pursuant to Administration Commission rules, FloridaCommerce is required to update the Hurricane Evacuation Modeling as new data becomes available. With new data available through the U.S. Census and American Community Survey, FloridaCommerce conducted baseline modeling in the summer of 2023 to understand how growth in the Florida Keys correlated with the statutory 24-hour hurricane evacuation clearance mandate.

FloridaCommerce utilized the Transportation Interface for Modeling Evacuations (TIME) Model in 2012 and 2023. The TIME Model is a state-of-the-art transportation evacuation model developed for statewide application for the Florida Division of Emergency Management. At its core, the TIME Model is a transportation model designed specifically for hurricane evacuation.

Hurricane evacuation modeling takes the number of housing units, subtracts the vacant housing units, and multiplies that sum by the participation rate (established by behavioral surveys), the number of available vehicles per occupied housing unit, and by the vehicle use rate (established by behavioral surveys). The number of evacuating vehicles is the final product, and the model loads the evacuating vehicles on the road using a traffic assignment algorithm to produce an evacuation clearance time.

2012 Evacuation Modeling

In 2012, FloridaCommerce facilitated hurricane evacuation modeling in coordination with local governments and stakeholders. The modeling inputs included variables such as census data, behavioral studies, hurricane forecasting, military evacuation procedures, traffic flow rates, private property rights, vacant platted lots, public comments, and relevant studies and research. The model was then updated with recent statistical information.

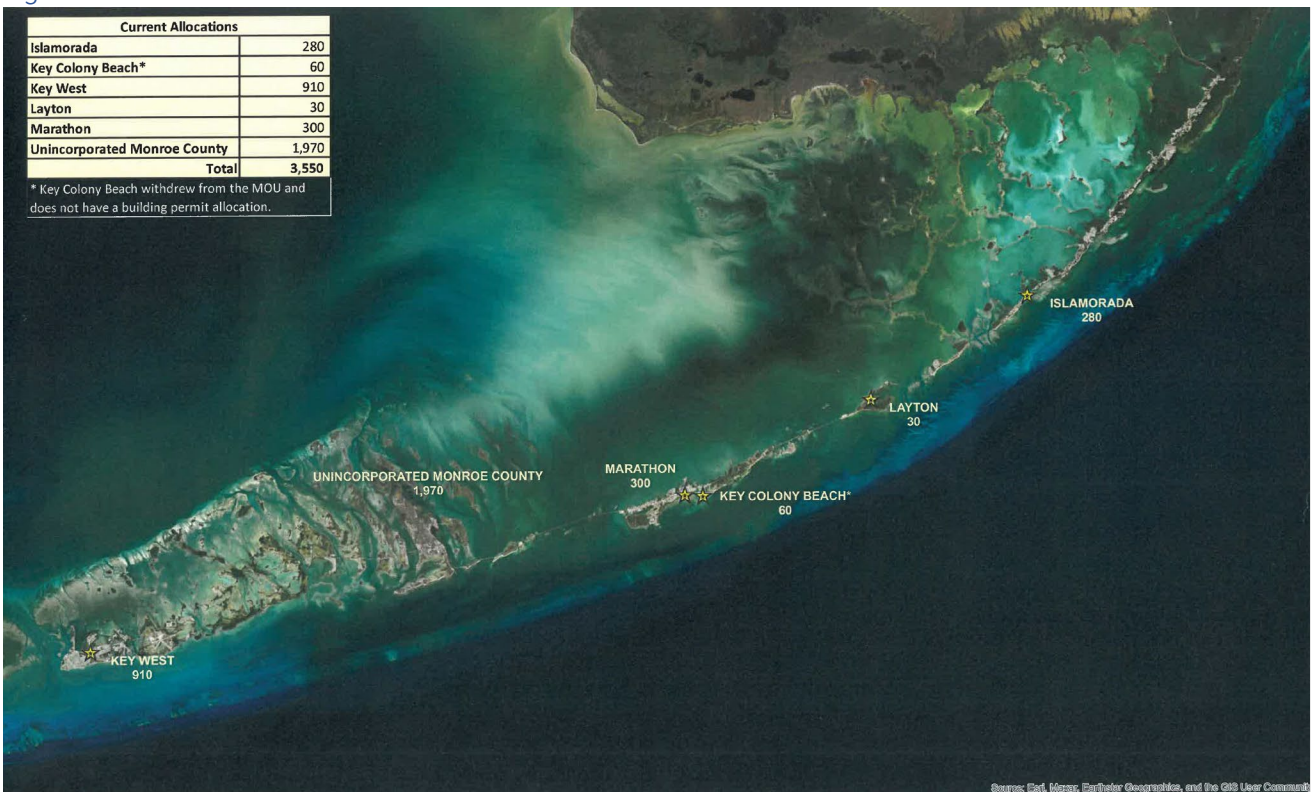
The 2012 TIME Model assumed a two-phase evacuation as follows and also assumed that the whole of the Florida Keys - the Florida Keys Area of Critical State Concern and the Key West Area of Critical Concern - were modeled as part of the evacuating population:

- Phase I occurs 24-48 hours in advance of tropical storm force winds and includes the evacuation of tourists, mobile homeowners, the dorms associated with the College of the Florida Keys, and other non-permanent residents.

- Phase 2 occurs 0–24 hours in advance of tropical force winds and includes the evacuation of all site-built permanent residents.

The results of evacuation modeling and build-out analysis were provided on March 7, 2013, to the Administration Commission as part of the 2012 Florida Keys Annual Report. At that meeting, the Commission voted to accept FloridaCommerce's build-out analysis. The allocation of 3,550 building permits was allotted to Islamorada, Key Colony Beach, Key West, Layton, Marathon, and unincorporated Monroe County to be issued over a 10-year period. Figure 1 shows the allocation allotments.

Figure 1



2023 Evacuation Modeling

In 2023, FloridaCommerce procured the same consultant that developed the TIME Model to update the model with 2020 U.S. Census and the American Community Survey data for the number and occupancy rates of dwelling units by type (site-built and mobile home) and their associated characteristics such as vehicles per household.

Tourist unit data was provided by the Florida Department of Business and Professional Regulation and Florida Keys local governments. Tourist unit occupancy rates were collected from Smith Travel Research (CoStar Group) in coordination with Monroe County. Human behavioral assumptions were provided from studies conducted for the Statewide Regional Evacuation Study Program for the South Florida Region. Roadway characteristics, including roadway capacity and flow rates were provided by the Florida Department of Transportation.

Hurricane evacuation modeling scenarios were also completed based on the following input variables:

1. Tourist Units (Phase I only)
2. 1,300 Workforce-Affordable Early-evacuation Units (Phase I only, *2023 Live Local Act)*
3. Mobile Home Units
4. Site-Built Units (Phase II only)
5. Participation Rates
6. Response Curve: 12 hours
7. Vehicle Usage by Unit Type
8. Vehicle Usage by the Special Populations
9. Evacuation Stream
10. Roadway Capacity

The 2023 TIME Model continues to assume a two-phase evacuation. FloridaCommerce had additional baseline modeling scenarios performed that were not run in 2012 to account for a decision from the Third District Court of Appeals (DCA), in *Mattino v. City of Marathon*[4] (2022):

- In 2012, mobile homes were modeled to evacuate in Phase I. However, in *Mattino* (2022), the Third DCA held that mobile home units should be categorized as permanent residents under Section 380.0552(9)(a)2., F.S., which means that mobile home residents should evacuate in Phase II. To facilitate discussion, FloridaCommerce ran baseline modeling scenarios accounting for mobile homes as Phase I and Phase II evacuees.

- In 2012, both the Florida Keys Area of Critical State Concern and the Key West Area of Critical State Concern were included in the model as part of the entire Florida Keys evacuating populations. In other words, in 2012, Key West ACSC residents were required to evacuate in Phases I and II as appropriate (e.g., permanent residents vs. non-permanent residents). However, in *Mattino (2022)*, the Third DCA held that Key West ACSC is not subject to the 24-hour evacuation requirement of section 380.0552(9)(a)2., F.S. To facilitate discussion, baseline modeling scenarios were performed that include and exclude the Key West Area of Critical State Concern.

[4] In Mattino, the Third District Court of Appeals (DCA), overturned, in part, FloridaCommerce's (formerly DEO) 's Final Order determining comprehensive plan amendments adopted by the City of Key West, the City of Marathon, and the Village of Islamorada to provide allocations for workforce affordable housing in the Florida Keys were "in compliance" with state and local laws. Cecilia Mattino and other residents of the Florida Keys challenged the amendments on the basis that the comprehensive plan amendments were not in compliance because they provided for the allocation of units in a manner that failed to adhere to the statutorily mandated 24-hour hurricane evacuation clearance time. The Third DCA reversed the agency's Final Order as to the plan amendments adopted by the City of Marathon and the Village of Islamorada and found those plan amendments to be in violation of the 24-hour requirement under section 380.0552(9), Florida Statutes. The Third DCA affirmed the agency's Final Order as to the plan amendment adopted by the City of Key West on the basis that that Key West is subject to the Principles for Guiding Development contained in Florida Administrative Code, Rule 28-36.003 rather than section 380.0552(9), Florida Statutes. See Mattino v. City of Marathon, 345 So. 3d 939 (Fla. 3d DCA 2022), reh'g denied (Sept. 20, 2022), review denied sub nom. Islamorada, Vill. of Islands v. Mattino, SC22-1422, 2023 WL 180738 (Fla. Jan. 13, 2023), and review denied sub nom. City of Marathon, Florida v. Mattino, SC22-1424, 2023 WL 180743 (Fla. Jan. 13, 2023).

2023 Community Engagement and Public Comments

To support the hurricane evacuation modeling, FloridaCommerce engaged in discussions with local governments, Keys residents and stakeholders, legislators, and the Florida Division of Emergency Management to gather input on public safety, evacuation, affordable housing, environmental protection, water quality, infrastructure needs, and development concerns.

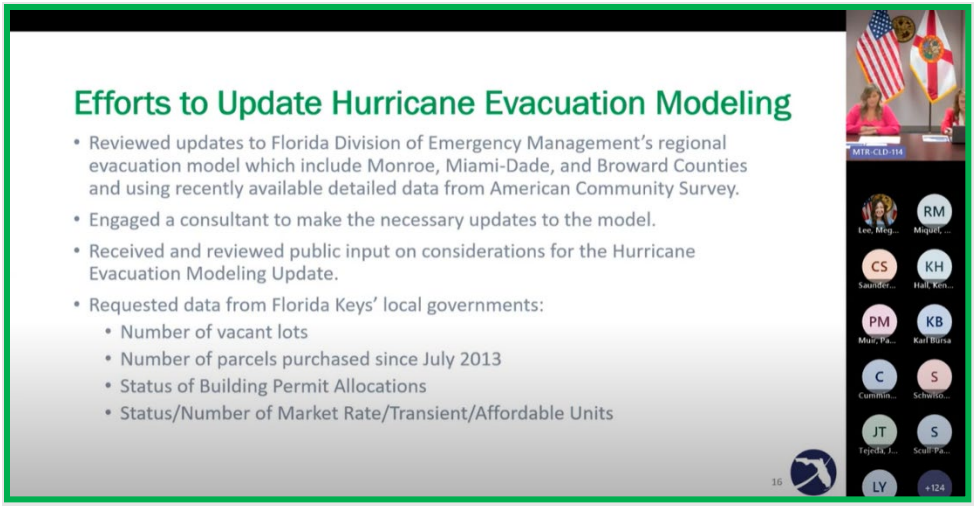




This community engagement included three televised, public workshops in June 2023, to gather input on Hurricane Evacuation Modeling in the cities of Key West, Marathon, and Key Largo. The workshops provided an overview of the relevant legislation and Administration Commission rules, a presentation on the 2012 hurricane evacuation modeling, and an outline of how the modeling data was utilized over the 10-year planning period. Finally, FloridaCommerce presented the next steps for the 2023 modeling effort and sought feedback from the stakeholders within the Florida Keys communities. More than 110 individuals participated in these workshops.

In November 2023, FloridaCommerce held two public virtual webinars to share an in-depth overview of the 2023 baseline modeling process, featuring a nationally recognized transportation modeling expert the agency engaged at the outset of the project.[5] The webinars offered a thorough review of the results of the 2023 baseline modeling and provided an overview of modeling scenarios that may be used to inform future land development and growth decisions. More than 230 participants attended these webinars.

[5] In 2023, FloridaCommerce contracted with recognized transportation modeling expert Roberto Miquel of Whitman, Requardt and Associates to assist the agency with the Hurricane Evacuation Baseline Modeling and scenarios regarding the possibility of future allocations.



Copies and recordings of all public meetings and webinars are available online at FloridaJobs.org/FLKeysEvac. Additionally, FloridaCommerce set up an email inbox (FLKeysEvac@Commerce.fl.gov) to provide a method for the public to submit comments on an ongoing basis.

A majority of the public comments raised by the community included the proliferation of vacation rental units, decreased drinking water supply capacity, deteriorating pump lines, and worsening traffic conditions due to ongoing development. In total, more than 125 public comments were received and reviewed by FloridaCommerce. The public comments are set forth in Appendix D.

2023 Baseline Modeling Results

The baseline modeling conducted by FloridaCommerce assists the local governments in meeting the statutory requirement to maintain a hurricane evacuation clearance time by ensuring the hurricane evacuation modeling is performed.

Tables 1 and 2 below summarize the results of the 2023 baseline modeling scenarios and variables described above, which was "conducted in accordance with a professionally accepted methodology and is updated periodically, as new data may become available," Section 380.0552(9)(a)2., Florida Statutes.

As demonstrated by the tables below, baseline scenarios modeled to include Key West ACSC have a dramatically increased evacuation clearance time versus the models that do not include Key West ACSC.

Table 1

Table 1, below, shows the results of two scenarios performed for Phases I and II. Baseline Scenario 1 places mobile homes in Phase II, while Baseline Scenario 2 places mobile homes in Phase I. Both scenarios include Key West ACSC (KW).

EVACUATION CLEARANCE TIMES (Hours)				
	Baseline Scenario 1 (Includes KW, Mobile Homes in Phase II)		Baseline Scenario 2 (Includes KW, Mobile Homes in Phase I)	
	Phase I	Phase II	Phase I	Phase II
KEY WEST	12.5	12.5	12.5	12.5
LOWER KEYS	13.0	19.5	13.0	17.5
MIDDLE KEYS	14.0	23.0	14.0	21.0
UPPER KEYS	15.0	25.5	15.0	23.5
OUT OF COUNTY	**15.5**	**26.0**	**15.5**	**24.0**

Table 2

Table 2, below, shows the results of two scenarios performed for Phases I and II. Baseline Scenario 3 places the mobile homes in Phase II, while Baseline Scenario 4 places mobile homes in Phase I. Both scenarios exclude Key West ACSC (KW).

EVACUATION CLEARANCE TIMES (Hours)				
	Baseline Scenario 3 (Excludes KW, Mobile Homes in Phase II)		Baseline Scenario 4 (Excludes KW, Mobile Homes in Phase I)	
	Phase I	Phase II	Phase I	Phase II
LOWER KEYS	14.0	13.0	14.0	13.0
MIDDLE KEYS	13.5	14.0	13.5	14.0
UPPER KEYS	14.5	15.0	14.5	15.0
OUT OF COUNTY	15.0	15.5	15.0	15.5

2023 Prospective Modeling to Inform Future Policy Considerations

Following the input received from local governments and the public, FloridaCommerce ran additional evacuation modeling scenarios to inform future policy considerations.

Table 3

After establishing the evacuation time for the current conditions, five additional scenarios (S1-S5) were modeled on top of the four baseline modeling scenarios described in Tables 1 and 2 that examined the effect of prospective building allocations.

To facilitate discussion, FloridaCommerce provides S1-S5 to help inform future policy considerations that may be considered by state and local officials and stakeholders.

Baseline Modeling			Phases	Florida Keys Including Key West		Florida Keys Excluding Key West	
				Mobile Homes in Phase 2 (hours)	Mobile Homes in Phase 1 (hours)	Mobile Homes in Phase 2 (hours)	Mobile Homes in Phase 1 (hours)
Baseline Modeling		Shows baseline - does not include additional prospective allocations	Phase 2	26.0	24.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
Prospective Modeling to Inform Future Policy Considerations							
S1	3,550 Allocations	Distribute based on county/municipality population size	Phase 2	27.5	25.5	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S2	3,550 Allocations	Distribute based percentage of vacant lands per county/municipality	Phase 2	28.0	26.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S3	3,550 Allocations	Distribute based on current allocations: (1,970-Monroe, 300-Marathon, 280-Islamorada, 910-Key West, 30-Layton, 60-Key Colony Beach)	Phase 2	28.0	26.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S4	Minimal Allocations (11 allocations/yr)	Distributes Monroe County (5); Marathon (2); Islamorada (2); Key West (2 – affordable only)	Phase 2 (10 Years Growth)	26.5	24.0	15.5	15.5
			Phase 2B (20 Years Growth)	26.5	24.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S5	One Unit/Vacant Lot	Distributes 7,954 units	Phase 2	31.0	28.5	17.0	16.5
			Phase 1	15.5	15.5	15.0	15.0

Scenarios 1, 2, and 3 model 3,550 prospective allocations, the same number of allocations that were established in the 2012 modeling efforts. While each of the three scenarios models the same number of allocations, the scenarios vary based on the distribution of the allocations throughout the Florida Keys:

- Scenario 1 (S1) distributes the prospective 3,550 allocations based on the population distribution, which would allow more growth to happen in the urbanized areas.

- Scenario 2 (S2) distributes the prospective allocations based on the vacant parcels per local government.

- Scenario 3 (S3) distributes the prospective allocations based on the current distribution initiated in 2013 and ending in 2023 (see Figure 1, above).

Scenarios 4 and 5 model minimal versus maximum allocations regarding vacant parcels in the Florida Keys:

- Scenario 4 (S4) provides for a minimal amount of prospective allocations.

- Scenario 5 (S5) provides prospective allocations equal to the amount of remaining vacant parcels in the Florida Keys (7,954 units).[6]

[6] Most lots in the Keys have a density greater than one unit per parcel. In other words, allocations and vacant parcels are not a 1:1 ratio.

Heat Maps

The following heat maps (Figures 2-6) are intended to serve as visual aids to support the information presented in Tables 1-3.

Figure 2

Figure 2 is a heat map intended to orient the reader to the color coding that are used in the heat maps contained within this report. The left end of the spectrum of colors shown here starting with light green represents less congestion while the right end of the spectrum in dark red represents more congestion. The images of cars on a road above each color is meant to convey a sense of the level of traffic represented by each color.



Figure 3

Figure 3 represents a map of a Phase II baseline run that excludes Key West and includes mobile homes without additional allocations being added (Baseline Scenario III). As shown, there is relatively light congestion in this scenario with some bottlenecking as one approaches Key Largo, as well as approaching Islamorada. The graph included in this map shows the anatomy of the clearance time for this scenario along with the total clearance time, in this case, 15.5 hours. The graph shows a tan portion called Mobilization, which is also referred to as the response curve period. The blue portion of the graph is the evacuation time under relatively free flow conditions for the last evacuees that began their journey at the end of the response curve period.

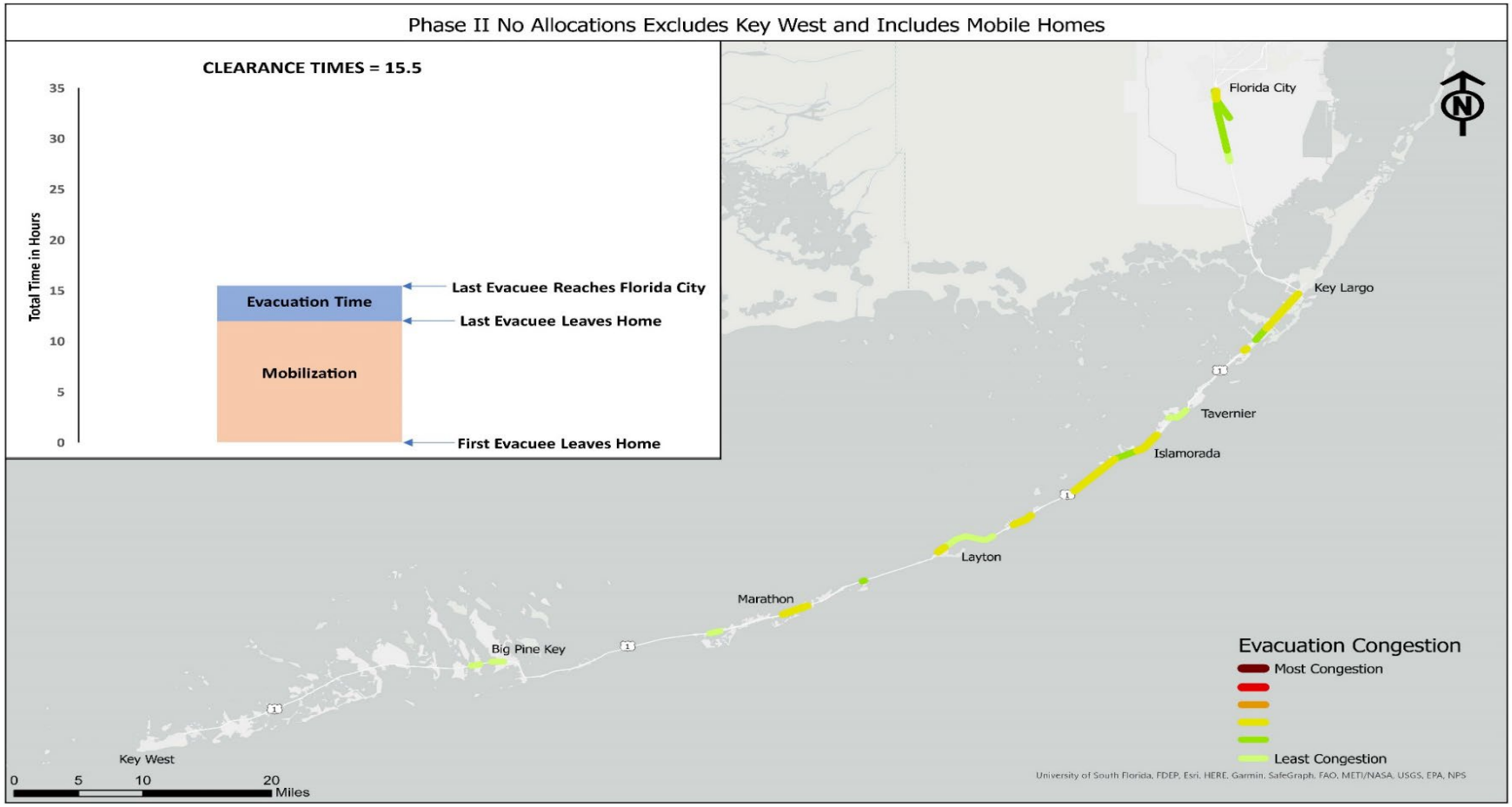


Figure 4

Figure 4 represents a map of a Phase II baseline run that includes Key West and mobile homes without additional allocations being added (Baseline Scenario I). In this case the graph shows a purple area that indicates additional evacuation time due to congestion. Congestion on the map is apparent approaching Islamorada, along with several hot spots shown in red between Marathon and Islamorada. The clearance time is 26 hours

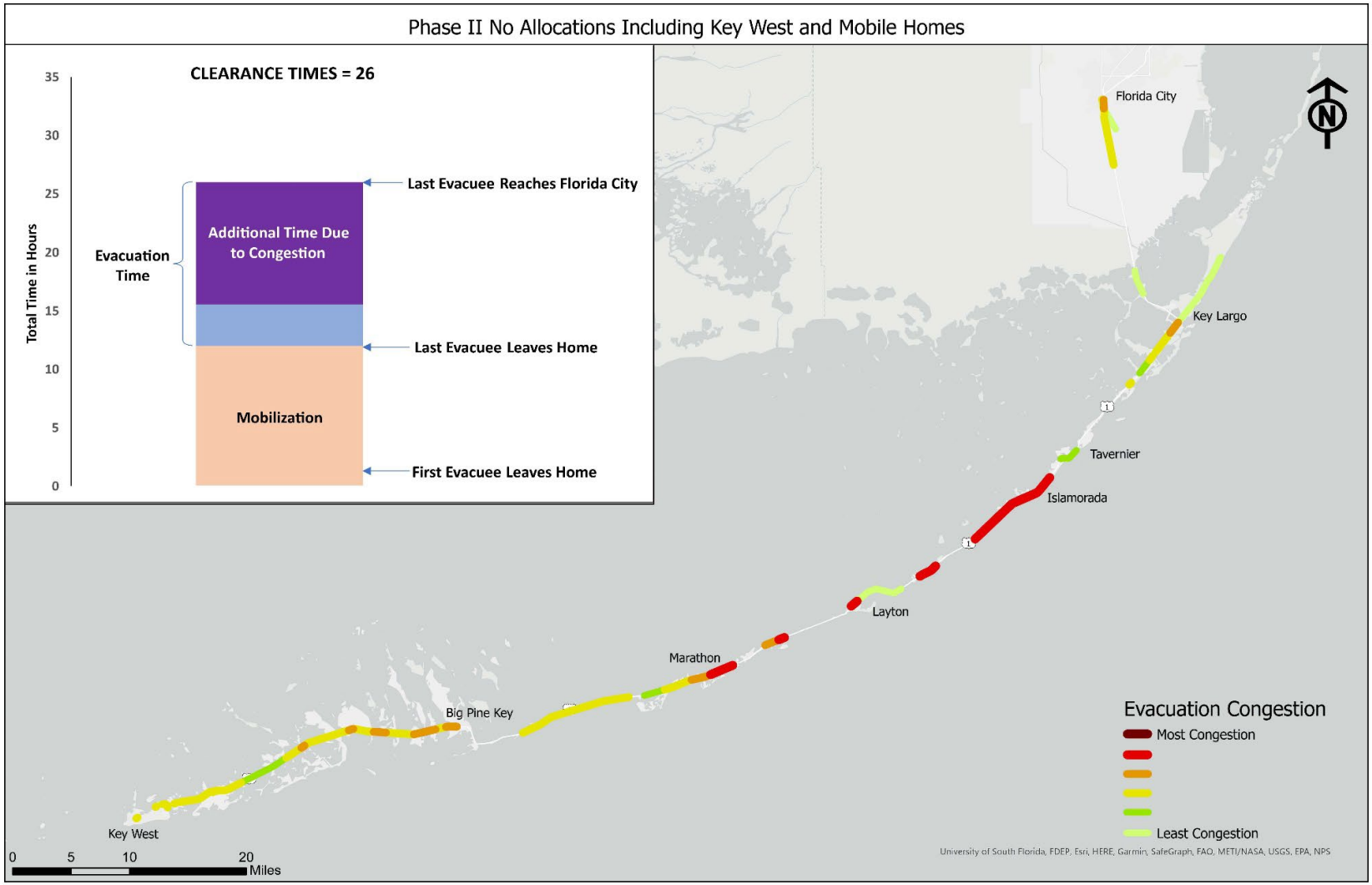


Figure 5

Figure 5 shows the heat maps representing a Phase II scenario using prospective allocations of 3,550 and including Key West and mobile homes. The clearance time here is 28 hours. As illustrated, there is an additional purple area on the graph that represents additional time due to congestion. This is the portion of the clearance time that can be attributed to the high number of vehicles on the road trying to evacuate. The map itself shows substantially more congestion than shown in Figure 4. The major hotspot here appears to be at Islamorada, with additional hotspots near Key Largo, Layton, and east of Marathon.

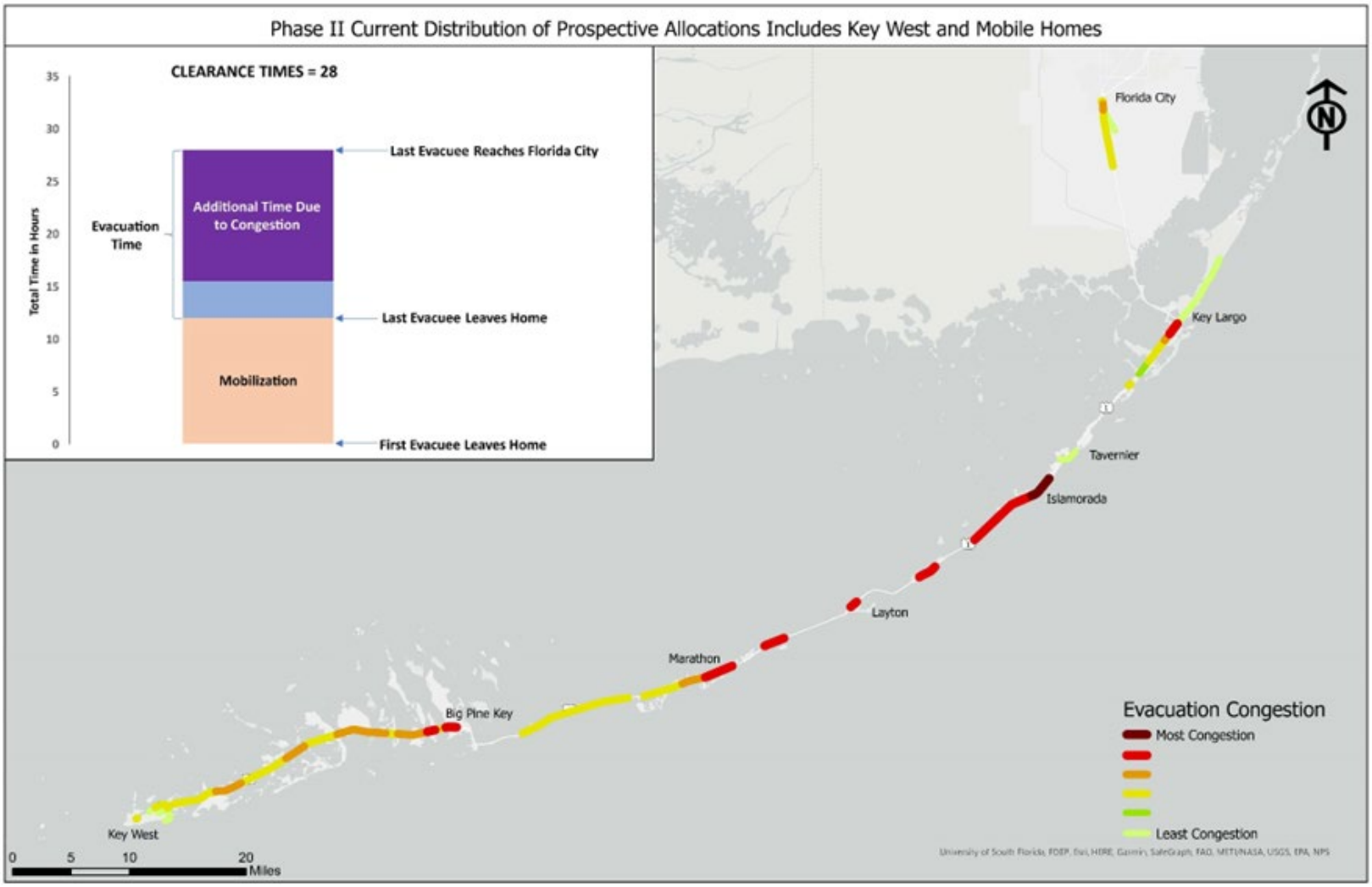
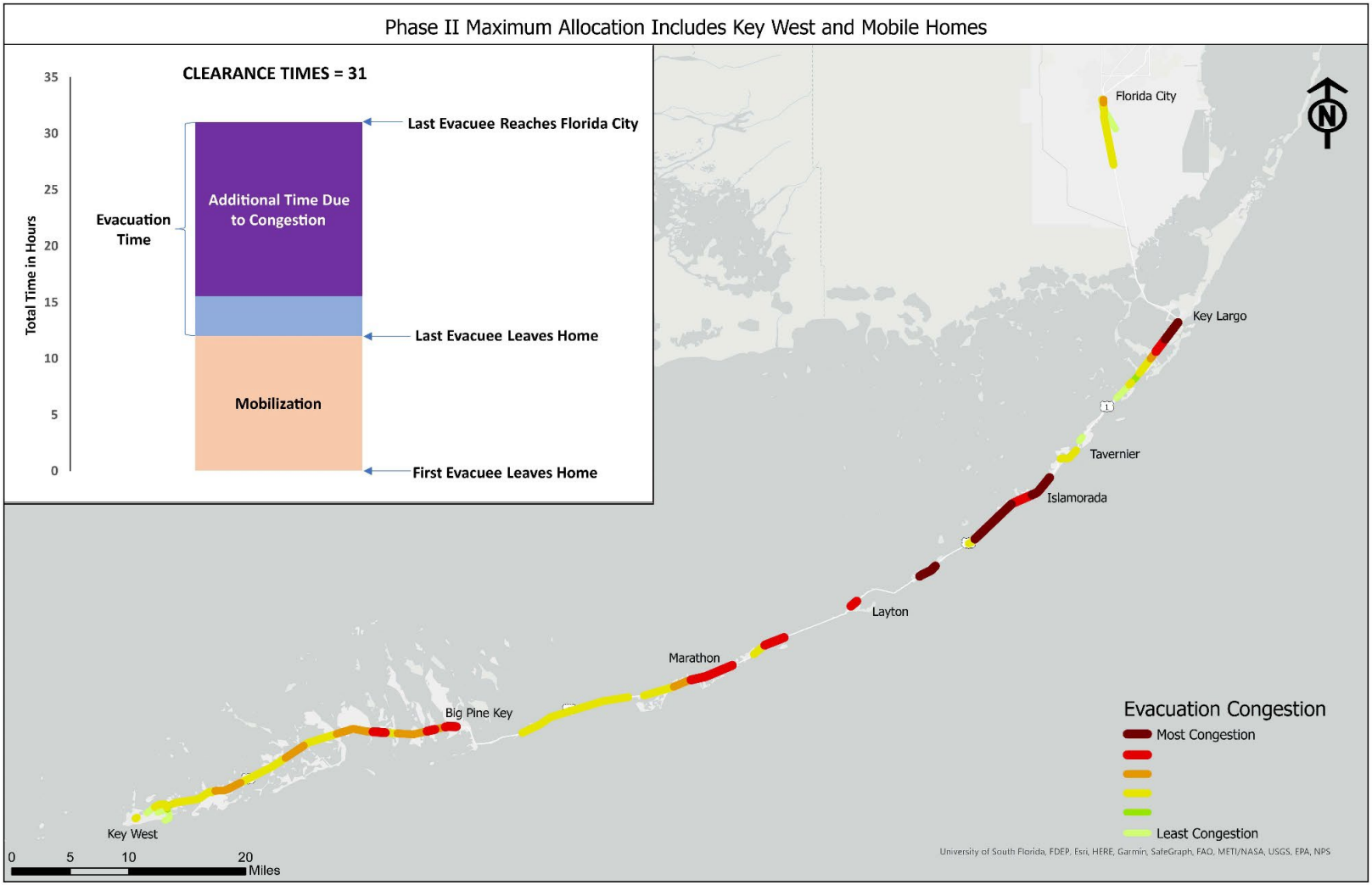


Figure 6

Figure 6 shows what clearance times look like for a Phase II evacuation with Key West and mobile homes included and enough prospective allocations to address all vacant parcels. In this case, maximum allocation represents an additional dwelling unit per vacant parcel in the Keys, or approximately 7,900 units. The clearance time increases to 31 hours in this scenario. Hotspots are in the same locations as shown on the previous slides, but more intense.



Study Summary & Policy Considerations

Study Summary

The 2023 Florida Keys Hurricane Evacuation Study has been performed in coordination with industry recognized standards and experts, and includes considerations from key stakeholders, local officials, and citizens within the Florida Keys. FloridaCommerce has fulfilled its responsibility of performing hurricane evacuation modeling according to Administration Commission Rules by providing a thorough analysis through multiple baseline modeling scenarios in an effort to help demonstrate whether permanent residents of the Florida Keys may evacuate in 24 hours pursuant to section 380.0552(9)(a)2., Florida Statutes. These baseline modeling scenarios and prospective modeling provided, are intended to inform future policy making decisions.

Policy Considerations

Ultimately, FloridaCommerce recognizes that the voice of citizens who live and work in the Florida Keys is paramount as scenarios are considered for future decision making, and it is our hope that the baseline modeling and scenarios included as part of this study help drive discussions and decision making at the local level in coordination with state officials.

As paths forward are considered regarding potential future growth within the Florida Keys, there are three major topics that were consistently voiced by citizens and local officials as top considerations:

- Infrastructure & Environmental Impact Considerations are front and center of the public safety discussion in the Florida Keys. Over the past twenty years, approximately one billion dollars has been spent by residents, as well as local, state, and federal governments, on septic to sewer conversion and stormwater management in the Keys to improve the near shore water quality. There is also a growing need to address the aging potable water conveyance system.[7] Roadway capacity and utility needs may be impacted if additional allocations are issued in the future.

- Affordable & Workforce Housing continues to be a major challenge in the Florida Keys for myriad reasons. Currently, there are large numbers of workers – from leisure and hospitality workers to public safety employees, such as firefighters - that commute daily from Florida City and farther north into the Florida Keys. Any discussions related to the possibility of future allocations for vacant parcels should keep affordable and workforce housing solutions top of mind.

[7] In March of 2023, a section of waterline ruptured in Islamorada, cutting off water to the rest of the Keys. A five-mile section of pipe is currently being replaced at a cost of $42 million and is expected to be complete in February of 2025.

- Evacuation Shelters are an important consideration when discussing growth in the Florida Keys. Currently, there are no evacuation shelters in the Florida Keys for a Category 3 storm or higher. The closest shelter on the mainland is in Miami-Dade County at Florida International University (FIU), and that shelter is at maximum capacity with existing evacuating populations. Any policies related to evacuation shelters should be developed in coordination with the Florida Division of Emergency Management.

Finally, in Table 4, FloridaCommerce has developed a table summarizing some of the possible paths forward that have been shared through the public comment and community engagement process. This table is meant to serve as a guide and is not meant to be an exhaustive list.

Table 4 – Possible Paths Forward Across Multiple Policy Considerations

Growth and Property Rights Considerations: • Explore the prospective allocations for additional building units over another planning horizon for vacant parcels. There are currently 7,954 vacant parcels in the Florida Keys. • Determine an appropriate planning horizon to ensure market stability. In 2012, it was determined that there would be a 10-year planning horizon (2013-2023) for 3,550 allocations. • Perform economic analysis to determine if prospective additional allocations would result in increased tax base allowing for more local investments in public safety. • Explore options for state land purchases.	Legislative Considerations: • Change law to increase evacuation time for permanent residents, which is currently 24 hours. • Create a definition in Florida Law for "permanent resident." (A definition does not currently exist.) • Allow for a specified number of allocations to be distributed.
Baseline Model Considerations: • Determine whether Key West residents are considered in the modeling. • Determine whether mobile home residents are included in Phase I or Phase II evacuation.	Local Considerations: • Consider ongoing and future system of managed growth strategies. • Review comprehensive plan policies and land development regulations, and revise as necessary. • Determine a planning horizon if any future allocations are issued (e.g.,10 years, 20 years, 30 years, etc.)

Appendix

Hurricane Evacuation Modeling Presentation (June 2023) ..... Appendix A
Hurricane Evacuation Modeling Presentation (November 2023) ..... Appendix B
Methodology and Data / 2023 Florida Keys Hurricane Evacuation Modeling ..... Appendix C
2023 Public Comments. ..... Appendix D

- Summary of Public Comments
- Copies of all public comments received

Section 380.0552, Florida Statutes.....Appendix E
2012 Hurricane Evacuation Memorandum of Understanding .....Appendix F
Rule 28-18, F.A.C. (Marathon Land Planning Regulations) ..... Appendix G
Rule 28-19, F.A.C. (Islamorada Land Planning Regulations) ..... Appendix H
Rule 28-20, F.A.C. (Monroe County Land Planning Regulations).....Appendix I
Rule 28-36, F.A.C. (Key West - Land Planning/Boundary and..... Appendix J
Principles for Guiding Development)
Section 163.3178, Florida Statutes..... Appendix K

Hurricane Evacuation Modeling

June 2023

Introduction

- Meredith Ivey, Office of the Secretary
- Kate Doyle, Assistant Deputy Secretary, Division of Community Development
- Valerie Wright, Deputy General Counsel
- Mary Clare Futch, Director of Legislative Affairs
- Justin Domer, Director of Office of Long-Term Resiliency
- Barbara Powell, Deputy Bureau Chief, Bureau of Community Planning and Growth
- Yazmin Valdez, Regional Planning Administrator
- Hannah Crow, External Affairs Coordinator
- Jason Eugene, Creative Director
- Megan Lee, Communications Liaison

Our Mission

PUBLIC SAFETY - Ensure safe and timely evacuation of residents in an emergency, pursuant to Section 380.0552, Florida Statutes.

QUALITY OF LIFE - Promote balanced growth, affordable housing solutions, and a sound economic base.

ENVIRONMENTAL PROTECTION - Protect the natural beauty and unique ecosystems in the Keys, some of the most magnificent in the world.

Agenda

- Hurricane Evacuation Modeling
  - Hurricane Evacuation Modeling Overview
  - Process to Update Hurricane Model
  - Next Steps
- Public Comments
- Closing Remarks

Florida Keys Area Protection Act, 380.0552, Florida Statutes

Legislative Intent:

- Establish a land use management system that:
  - Protects the natural environment of the Florida Keys;
  - Conserves and promotes the community character of the Florida Keys;
  - Promotes orderly and balanced growth in accordance with the capacity of available and planned public facilities and services; and
  - Promotes and supports a diverse and sound economic base.
- Provide affordable housing in close proximity to places of employment in the Florida Keys.

Florida Keys Area Protection Act, 380.0552, Florida Statutes

Legislative Intent Continued:

- Protect the constitutional rights of property owners to own, use, and dispose of their real property.
- Promote coordination and efficiency among governmental agencies that have permitting jurisdiction over land use activities in the Florida Keys.
- Promote an appropriate land acquisition and protection strategy for environmentally sensitive lands within the Florida Keys.
- Protect and improve the nearshore water quality of the Florida Keys through federal, state, and local funding of water quality improvement projects, including the construction and operation of wastewater management facilities.
- Ensure that the population of the Florida Keys can be safely evacuated.

Hurricane Evacuation Modeling Overview

- Land management system established in the Florida Keys to promotes orderly and balanced growth:
  - Manages the number of building permit allocations that can be issued for development in the Florida Keys.
  - System is often referred to as the Rate of Growth Ordinance (ROGO) or the Building Permit Allocation System (BPAS).

"Protect public safety and welfare in the event of a natural disaster by maintaining a hurricane evacuation clearance time for permanent residents of no more than 24 hours."

Section 380.0552(9)(a)2., Florida Statutes

Administration Commission Rules

1. Develop a Memorandum of Understanding (MOU) that stipulates the input variables and assumptions used in the model.
2. Update the data for the Florida Keys Hurricane Evacuation Model as professionally acceptable sources of information are released (such as the Census, American Communities Survey, Bureau of Economic and Business Research, and other studies).
3. Use the variables and assumptions in the model to complete a build-out analysis.
4. Apply the derived clearance times to determine the remaining allocations.
5. Amend comprehensive plans to reflect the new allocations as needed.

Hurricane Evacuation Modeling Overview

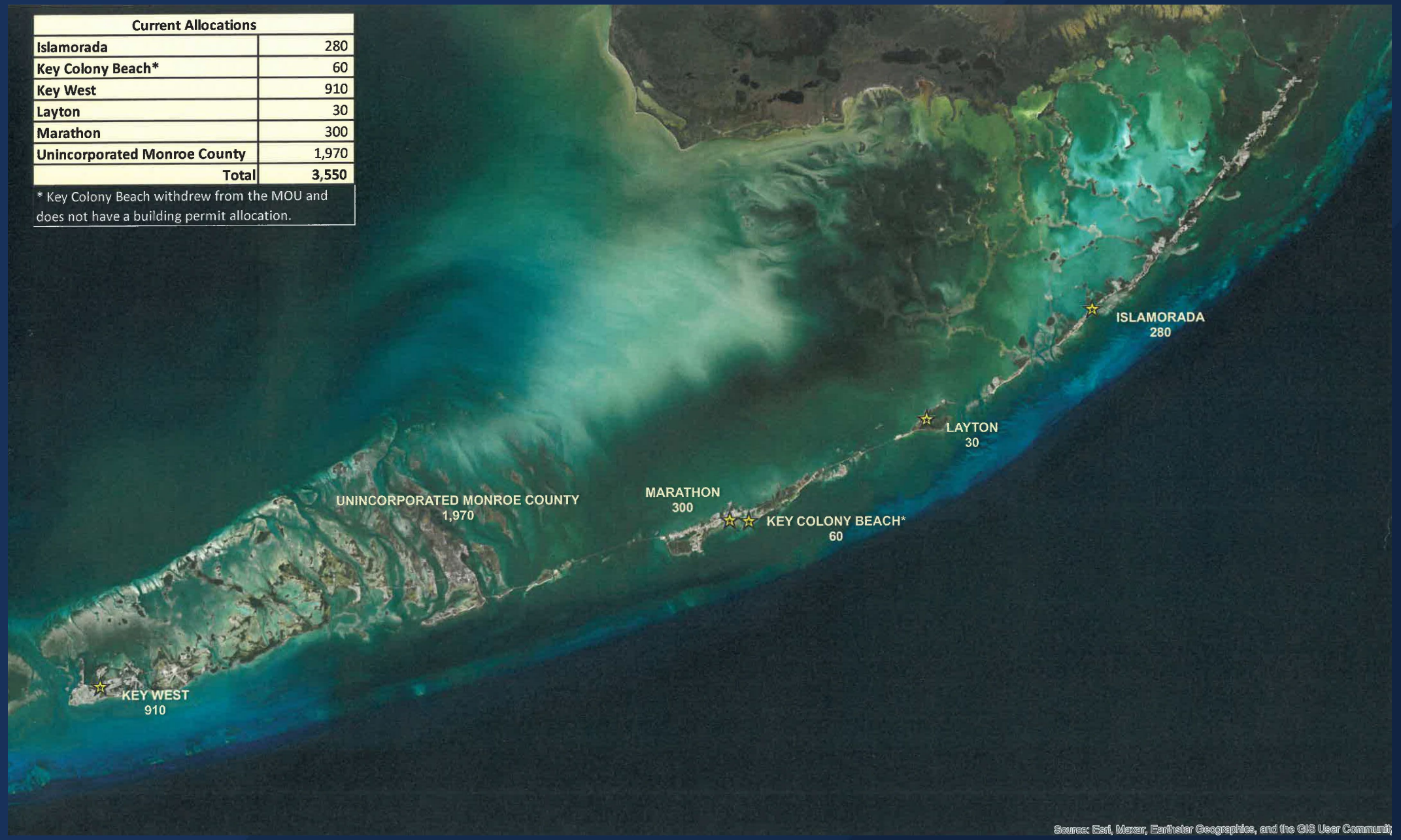
The MOU established 3,550 new residential building permit allocations modeled to be distributed.

Allocation Distribution	
Islamorada	280
Key Colony Beach*	60
Key West	910
Layton	30
Marathon	300
Unincorporated Monroe County	1,970

*Key Colony withdrew from the MOU

Current Allocations	
Islamorada	280
Key Colony Beach*	60
Key West	910
Layton	30
Marathon	300
Unincorporated Monroe County	1,970
Total	3,550

* Key Colony Beach withdrew from the MOU and does not have a building permit allocation.



Hurricane Evacuation Modeling Overview

Variables in the Transportation Interface for Modeling Evacuations (TIME)

- Tourist Units
- Mobile Home Units
- Site-Built Units
- Response Curve
- Participation Rates
- Vehicle Usage by Unit Type
- Vehicle Unit by Special Population
- Evacuation Stream
- Roadway Capacity
- Evacuation Procedures

Hurricane Evacuation Modeling Overview

- The 2012 MOU was based on a model that assumed a two-phase evacuation.
  - Phase I (24 - 48 hours in advance of tropical storm force winds)
    - Non-residents and others, mobile home residents and military personnel evacuate.
  - Phase 2 (0 – 24 hours in advance of tropical storm force winds)
    - All permanent residents must evacuate.

Memorandum of Understanding (MOU) - 2012

- Directed by the Administration Commission (Governor and Cabinet).
- Signed by local governments within the Florida Keys, the Florida Department of Economic Opportunity, and the Florida Division of Emergency Management.
- Memorialized an analysis of maximum build-out capacity for the Florida Keys, consistent with the requirement to maintain a 24-hour evacuation clearance time.
- Established 3,550 new residential building permit allocations.
- Modeled using 2010 census data. (The 2020 census detailed data necessary for updated modeling recently became available)

Updating the Hurricane Evacuation Model

- Ongoing communication with Keys local government staff.
- Review of updates to Florida Division of Emergency Management's regional evacuation model which include Monroe, Miami-Dade and Broward Counties and uses American Community Survey Data.
- DEO has engaged a consultant to make the necessary updates to the model:
  - Monroe County only
  - Mobile home/site-built/Navy PCOS [spell this out please]
  - Review of roadway capacity
  - 2020 Census data
  - Updated Transient data

Next Steps

- Receive and review public input on considerations for the Hurricane Evacuation Modeling Update.
- Request data from Florida Keys' local governments:
  - Number of vacant lots
  - Number of parcels purchased since July 2013
  - Status of Building Permit Allocations
    - Status/Number of Market Rate/Transient/Affordable Units

Public Comments

Contact



Thank You.

If you have questions or comments about this presentation, please contact our office.



Bureau of Community Planning and Growth
Email: **FL**KeysEvac@DEO.MyFlorida.com



FLORIDA COMMERCE

2023 Florida Keys Hurricane Evacuation Modeling

November 2023

Agenda

- FloridaCommerce Hurricane Evacuation Modeling Goals
- Community Engagement
- Florida Keys Evacuation Modeling Overview
- 2023 Baseline Modeling Process
- Results of 2023 Baseline Modeling Process
- Prospective Modeling for Possible Future Allocations
- Questions & Answers

FloridaCommerce Hurricane Evacuation Modeling Goals

- **Public Safety** - Ensure safe and timely evacuation of residents in an emergency, pursuant to Section 380.0552, Florida Statutes.

- **Quality of Life** - Promote balanced growth, affordable housing solutions, and a sound economic base.

- **Environmental Protection** - Protect the natural beauty and unique ecosystems in the Florida Keys, some of the most magnificent in the world.

Robust Community Engagement

- In June 2023, FloridaCommerce met with local leadership in Monroe County to discuss long-term recovery efforts post-hurricanes Ian and Nicole.
- FloridaCommerce received critical input from workshop attendees to inform future hurricane evacuation modeling to keep Florida Keys residents and visitors safe.



Hurricane Evacuation Modeling Workshops

- More than 100 individuals – from community members to local government representatives and stakeholders – participated in the public workshops to provide valuable insight.
- Public workshops were held in Key West, Marathon, and Key Largo.
- FloridaCommerce staff also held individual meetings with local government leadership and Monroe County staff.
- All workshops were live streamed in coordination with Monroe County and are available at www.floridajobs.org/FLKeysEvac







Florida Keys Evacuation Modeling Overview

Memorandum of Understanding (MOU) - 2012

- Directed by the Administration Commission (Governor and Cabinet).
- Signed by local governments within the Florida Keys, FloridaCommerce, and the Florida Division of Emergency Management.
- Memorialized an analysis of maximum build-out capacity for the Florida Keys, consistent with the requirement to maintain a 24-hour evacuation clearance time.
- Established 3,550 new residential building permit allocations.
- Modeled using 2010 census data (the 2020 census detailed data necessary for updated modeling recently became available).

Section 380.0552(9)(a)2., Florida Statutes

FloridaCommerce is the "State Land Planning Agency" and is responsible for facilitating a hurricane evacuation study for the Florida Keys …

"… Amendments to local comprehensive plans in the Florida Keys Area must also be reviewed for compliance with the following … 2. Goals, objectives, and policies to protect public safety and welfare in the event of a natural disaster by maintaining a hurricane evacuation clearance time for permanent residents of no more than 24 hours. The hurricane evacuation clearance time shall be determined by a hurricane evacuation study conducted in accordance with a professionally accepted methodology and approved by the state land planning agency."

Administration Commission Rules

1. Develop a Memorandum of Understanding (MOU) that stipulates the input variables and assumptions used in the model.
2. Update the data for the Florida Keys Hurricane Evacuation Model as professionally acceptable sources of information are released (such as the Census, American Communities Survey, Bureau of Economic and Business Research, and other studies).
3. Use the variables and assumptions in the model to complete a build-out analysis.
4. Apply the derived clearance times to determine the remaining allocations.
5. Amend comprehensive plans to reflect the new allocations as needed.

Building Permit Allocation System

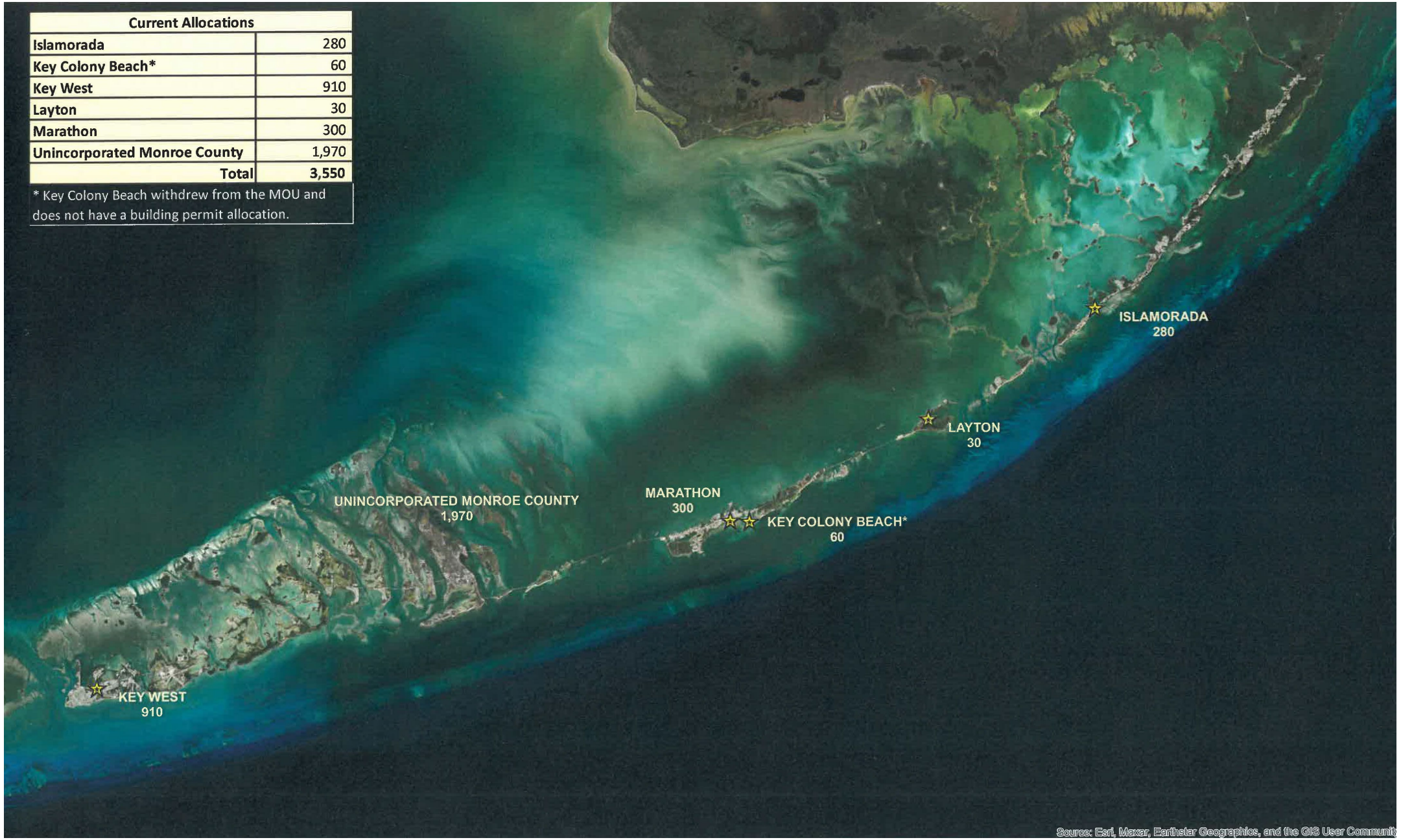
- As part of the overall evacuation strategy, the Florida Administration Commission adopted a building permit allocation system (BPAS) that caps the number of permits that can be issued for new residential structures.
- Based on existing infrastructure and evacuation strategies, and computer modeling that was performed in 2012, the projected maximum build out for the Florida Keys was estimated to be the development of an additional 3,550 allocations beginning July 2013. A portion of these allocations have been set-aside for affordable housing.
- At the March 7, 2013, meeting of the Administration Commission, the Commission voted to accept FloridaCommerce's recommendation of a building allocation of 3,550 and to distribute those allocations over a ten-year period, which ends in 2023.

Areas of Critical State Concern & Key West

- Areas of Critical State Concern are designated and administered under Section 380.05, F.S. Specific Areas of Critical State Concern are governed by certain statute and/or Administration Commission Rules.
- There are two Areas of Critical State Concern in the Florida Keys:
  - The City of Key West and the Florida Keys Area.
- The Florida Keys Area includes unincorporated Monroe County, and the municipalities of Layton, Islamorada, Marathon and Key Colony Beach.
- The Key West Area of Critical State Concern is governed by Chapter 28-36, Florida Administrative Code (F.A.C.), while the Florida Keys Area of Critical State Concern is governed by Section 380.0552, F.S.

Current Allocations	
Islamorada	280
Key Colony Beach*	60
Key West	910
Layton	30
Marathon	300
Unincorporated Monroe County	1,970
Total	3,550

* Key Colony Beach withdrew from the MOU and does not have a building permit allocation.



2023 Baseline Modeling Process

Hurricane Evacuation Modeling Overview

Variables in the Transportation Interface for Modeling Evacuations (TIME)

- Tourist Units
- Mobile Home Units
- Site-Built Units
- Response Curve
- Participation Rates
- Vehicle Usage by Unit Type
- Vehicle Unit by Special Population
- Evacuation Stream
- Roadway Capacity
- Evacuation Procedures

Hurricane Evacuation Modeling Overview

- The 2012 MOU was based on a two-phase evacuation methodology. We continued this methodology for 2023.
  - Phase I (24 - 48 hours in advance of tropical storm force winds)
    - Non-residents and others, mobile home residents and military personnel evacuate.
  - Phase 2 (0 – 24 hours in advance of tropical storm force winds)
    - All permanent residents must evacuate.

Efforts to Update Hurricane Evacuation Modeling

- Reviewed updates to Florida Division of Emergency Management's regional evacuation model which include Monroe, Miami-Dade, and Broward Counties and using recently available detailed data from American Community Survey.
- Engaged a consultant to make the necessary updates to the model.
- Received and reviewed public input on considerations for the Hurricane Evacuation Modeling Update.
- Requested data from Florida Keys' local governments:
  - Number of vacant lots
  - Number of parcels purchased since July 2013
  - Status of Building Permit Allocations
  - Status/Number of Market Rate/Transient/Affordable Units

Developing Baseline Modeling

1. Based on 2012 two-phased modeling.
2. Factoring mobile homes in Phase 2 evacuation (permanent residents).
3. Including the Florida Keys Area of Critical State Concern and not including the Key West Area of Critical State Concern factoring mobile homes in Phase 2 evacuation.
4. Baseline Model including the Florida Keys Area of Critical State Concern and not including the Key West Area of Critical State Concern factoring mobile homes in Phase 2 evacuation.

Input Parameters for all Baseline Modeling

Phase 1: Non-Permanent Population
12-Hour Response Curve
Evacuation Level: E (maximum threat)

SCENARIO INPUT PARAMETERS	
REGION	South Florida
BEHAVIORAL ASSUMPTION	100% Response
NETWORK PERIOD	2020
POPULATION PERIOD	2020
MODEL	Run Full Model
University POPULATION	Fall/Spring Session (100% in residence)
SHELTER STATUS	Primary Open
TOURIST INCLUDED	Yes (no override rates)

Phase 2: Permanent Population
12-Hour Response Curve
Evacuation Level: E (maximum threat)

SCENARIO INPUT PARAMETERS	
REGION	South Florida
BEHAVIORAL ASSUMPTION	Planning Assumptions
NETWORK PERIOD	2020
POPULATION PERIOD	2020
MODEL	Run Full Model
University POPULATION	Out of Session (0% in residence)
SHELTER STATUS	Primary Open
TOURIST INCLUDED	No

Results of 2023 Baseline Modeling Process

Population Demographics Including Key West

Mobile Homes in Phase 2

Baseline Model 1: Phase 1 Non-Permanent Population

Areas	Site-Built Population	Mobile Home Population	University Population	Tourist Population	Total Evacuating Population
Key West	2,193	54	0	8,311	10,558
Lower Keys	225	190	0	292	707
Middle Keys	4,350	49	0	2,373	6,773
Upper Keys	2,118	38	0	4,291	6,447

RV/Van/Boat no Mobile Homes

Baseline Model 1: Phase 2 Permanent Population

Areas	Site-Built Population	Mobile Home Population	University Population	Tourist Population	Total Evacuating Population
Key West	23,798	2,792	0	0	26,590
Lower Keys	10,703	1,762	0	0	12,464
Middle Keys	9,318	1,083	0	0	10,402
Upper Keys	16,645	2,064	0	0	18,709

Vehicle Demographics Including Key West

Mobile Homes in Phase 2

Baseline Model 1: Phase1 Non-Permanent Population

Areas	Site-Built Evacuating Vehicles	Mobile Home Evacuating Vehicles	University Evacuating Vehicles	Tourist Evacuating Vehicles	Total Evacuating Vehicles
Key West	1,737	33	0	4,155	5,925
Lower Keys	170	133	0	146	449
Middle Keys	2,214	16	0	1,187	3,417
Upper Keys	930	29	0	2,146	3,105

RV/Van/Boat no Mobile Homes

Baseline Model 1: Phase 2 Permanent Population

Areas	Site-Built Evacuating Vehicles	Mobile Home Evacuating Vehicles	University Evacuating Vehicles	Tourist Evacuating Vehicles	Total Evacuating Vehicles
Key West	12,541	1,096	0	0	13,637
Lower Keys	6,114	1,143	0	0	7,257
Middle Keys	4,428	431	0	0	4,859
Upper Keys	7,377	1,326	0	0	8,703

Population Demographics Including Key West

Mobile Homes in Phase 1

Baseline Model 2: Phase 1 Non-Permanent Population

Areas	Site-Built Population	Mobile Home Population[1]	University Population	Tourist Population	Total Evacuating Population
Key West	2,193	3,237	0	8,311	13,741
Lower Keys	225	2,078	0	292	2,595
Middle Keys	4,350	1,247	0	2,373	7,971
Upper Keys	2,118	2,350	0	4,291	8,759

Mobile Homes added to RV/Van/Boat

Baseline Model 2: Phase 2 Permanent Population

Areas	Site-Built Population	Mobile Home Population	University Population	Tourist Population	Total Evacuating Population
Key West	23,798	0	0	0	23,798
Lower Keys	10,703	0	0	0	10,703
Middle Keys	9,318	0	0	0	9,318
Upper Keys	16,645	0	0	0	16,645

Vehicle Demographics Including Key West

Mobile Homes in Phase 1

Baseline Model 2: Phase1 Non-Permanent Population

Areas	Site-Built Evacuating Vehicles	Mobile Home Evacuating Vehicles[1]	University Evacuating Vehicles	Tourist Evacuating Vehicles	Total Evacuating Vehicles
Key West	1,737	1,263	0	4,155	7,155
Lower Keys	170	1,353	0	146	1,669
Middle Keys	2,214	496	0	1,187	3,897
Upper Keys	930	1,508	0	2,146	4,584

Mobile Homes added to RV/Van/Boat

Baseline Model 2: Phase 2 Permanent Population

Areas	Site-Built Evacuating Vehicles	Mobile Home Evacuating Vehicles	University Evacuating Vehicles	Tourist Evacuating Vehicles	Total Evacuating Vehicles
Key West	12,541	0	0	0	12,541
Lower Keys	6,114	0	0	0	6,114
Middle Keys	4,428	0	0	0	4,428
Upper Keys	7,377	0	0	0	7,377

Clearance Times Including Key West

EVACUATION CLEARANCE TIMES (Hours)				
	Baseline Model 1 (Includes KW, Mobile Homes in Phase 2)		Baseline Model 2 (Includes KW, Mobile Homes in Phase 1)	
	Phase 1	Phase 2	Phase 1	Phase 2
KEY WEST	12.5	12.5	12.5	12.5
LOWER KEYS	13.0	19.5	13.0	17.5
MIDDLE KEYS	14.0	23.0	14.0	21.0
UPPER KEYS	15.0	25.5	15.0	23.5
OUT OF COUNTY	15.5	26.0	15.5	24.0

Population Demographics Excluding Key West

Mobile Homes in Phase 2

Baseline 3: Phase 1 Non-Permanent Population

Areas	Site-Built Population	Mobile Home Population	University Population	Tourist Population	Total Evacuating Population
Lower Keys	225	190	0	292	707
Middle Keys	4,350	49	0	2,373	6,773
Upper Keys	2,118	38	0	4,291	6,447

RV/Van/Boat no Mobile Homes

Baseline 3: Phase 2 Permanent Population

Areas	Site-Built Population	Mobile Home Population	University Population	Tourist Population	Total Evacuating Population
Lower Keys	10,703	1,762	0	0	12,464
Middle Keys	9,318	1,083	0	0	10,402
Upper Keys	16,645	2,064	0	0	18,709

Population Demographics Excluding Key West

Mobile Homes in Phase 1

Baseline 4: Phase 1 Non-Permanent Population

Areas	Site-Built Population	Mobile Home Population[1]	University Population	Tourist Population	Total Evacuating Population
Lower Keys	225	2,078	0	292	2,595
Middle Keys	4,350	1,247	0	2,373	7,971
Upper Keys	2,118	2,350	0	4,291	8,759

Mobile Homes added to RV/Van/Boat

Baseline 4: Phase 2 Permanent Population

Areas	Site-Built Population	Mobile Home Population	University Population	Tourist Population	Total Evacuating Population
Lower Keys	10,703	0	0	0	10,703
Middle Keys	9,318	0	0	0	9,318
Upper Keys	16,645	0	0	0	16,645

Vehicle Demographics Excluding Key West

Mobile Homes in Phase 2

Baseline 3: Phase 1 Non-Permanent Population

Areas	Site-Built Evacuating Vehicles	Mobile Home Evacuating Vehicles	University Evacuating Vehicles	Tourist Evacuating Vehicles	Total Evacuating Vehicles
Lower Keys	133	133	0	146	449
Middle Keys	2,214	16	0	1,187	3,417
Upper Keys	930	29	0	2,146	3,105

RV/Van/Boat no Mobile Homes

Baseline 3: Phase 2 Permanent Population

Areas	Site-Built Evacuating Vehicles	Mobile Home Evacuating Vehicles	University Evacuating Vehicles	Tourist Evacuating Vehicles	Total Evacuating Vehicles
Lower Keys	6,114	1,143	0	0	7,257
Middle Keys	4,428	431	0	0	4,859
Upper Keys	7,377	1,326	0	0	8,703

Vehicle Demographics Excluding Key West

Mobile Homes in Phase 1

Baseline 4: Phase 1 Non-Permanent Population

Areas	Site-Built Evacuating Vehicles	Mobile Home Evacuating Vehicles[1]	University Evacuating Vehicles	Tourist Evacuating Vehicles	Total Evacuating Vehicles
Lower Keys	133	1,353	0	146	1,632
Middle Keys	2,214	496	0	1,187	3,897
Upper Keys	930	1,508	0	2,146	4,584

Mobile Homes added to RV/Van/Boat

Baseline 4: Phase 2 Permanent Population

Areas	Site-Built Evacuating Vehicles	Mobile Home Evacuating Vehicles	University Evacuating Vehicles	Tourist Evacuating Vehicles	Total Evacuating Vehicles
Lower Keys	6,114	0	0	0	6,114
Middle Keys	4,428	0	0	0	4,428
Upper Keys	7,377	0	0	0	7,377

Clearance Times Excluding Key West

EVACUATION CLEARANCE TIMES (Hours)				
	Baseline Model 3 (Excludes KW, Mobile Homes in Phase 2)		Baseline Model 4 (Excludes KW, Mobile Homes in Phase 1)	
	Phase 1	Phase 2	Phase 1	Phase 2
LOWER KEYS	14.0	13.0	14.0	13.0
MIDDLE KEYS	13.5	14.0	13.5	14.0
UPPER KEYS	14.5	15.0	14.5	15.0
OUT OF COUNTY	15.0	15.5	15.0	15.5

Phase 1 & 2 Results Summary

Out-of-County Clearance Times

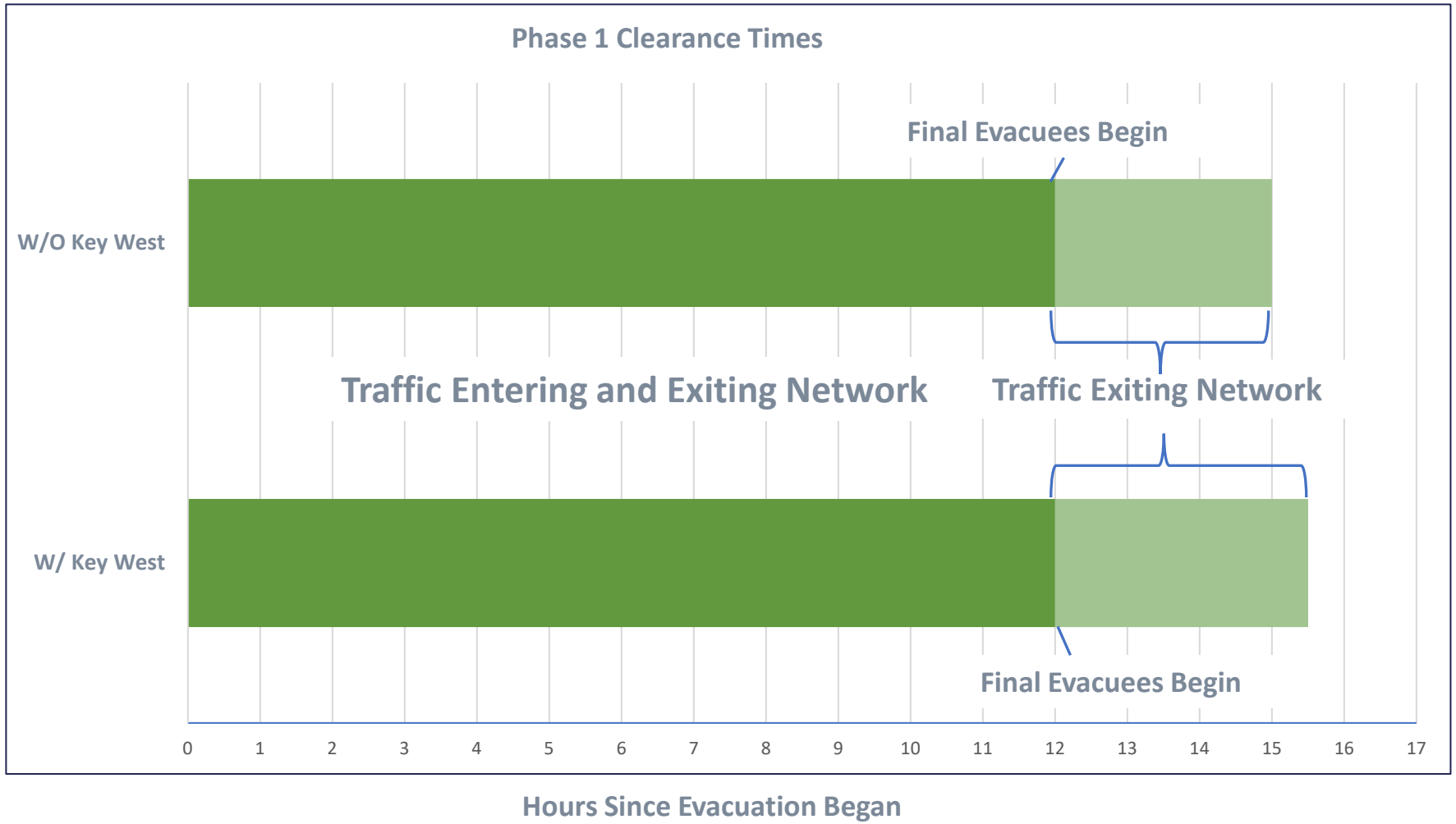
FLORIDA KEYS INCLUDING KEY WEST	
Mobile Homes in Phase 2	Mobile Homes in Phase 1
Phase 1	**Phase 1**
15.5	15.5
Phase 2	**Phase 2**
26.0	24.0

FLORIDA KEYS EXCLUDING KEY WEST	
Mobile Homes in Phase 2	Mobile Homes in Phase 1
Phase 1	**Phase 1**
15.0	15.0
Phase 2	**Phase 2**
15.5	15.5

Clearance Time Differences in Phase 1

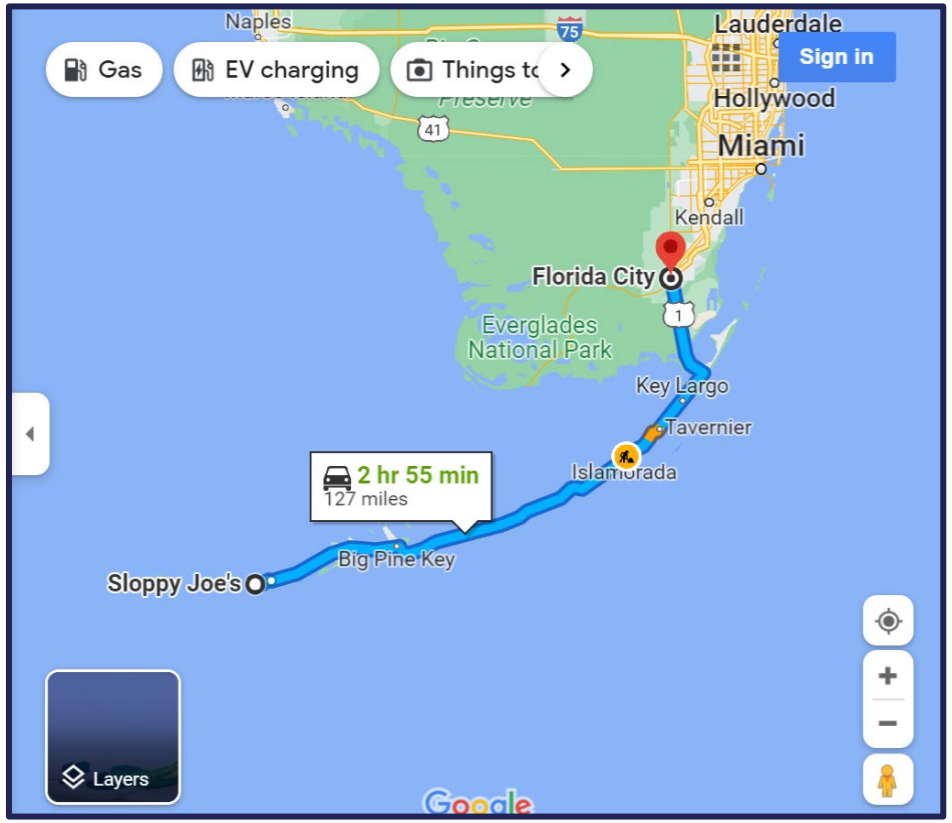
- Only 0.5-hour difference with Key West and Without Key West
- Congestion is not linear
  - System breaks down only when too many vehicles are present
  - Fewer vehicles means free-flowing traffic
- Not enough vehicles to cause congestion in Phase 1
- Clearance Times are longer when Key West is included in Phase 1 only because Key West is farther away

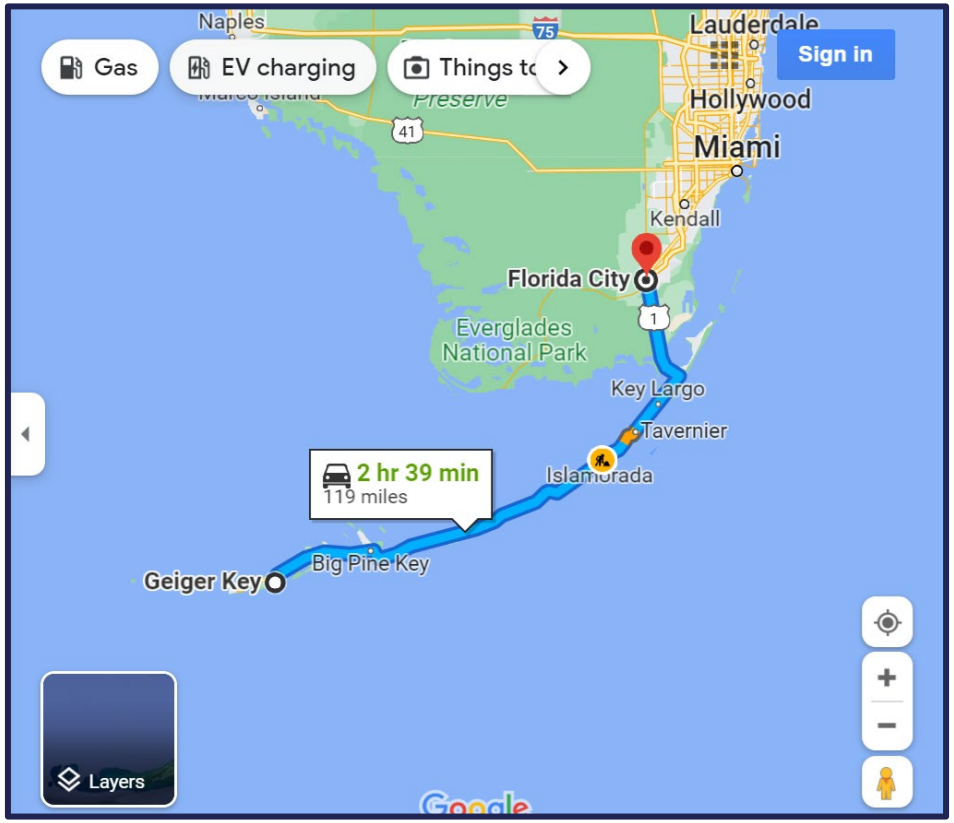
Clearance Time Differences in Phase 1



Clearance Time Differences in Phase 1

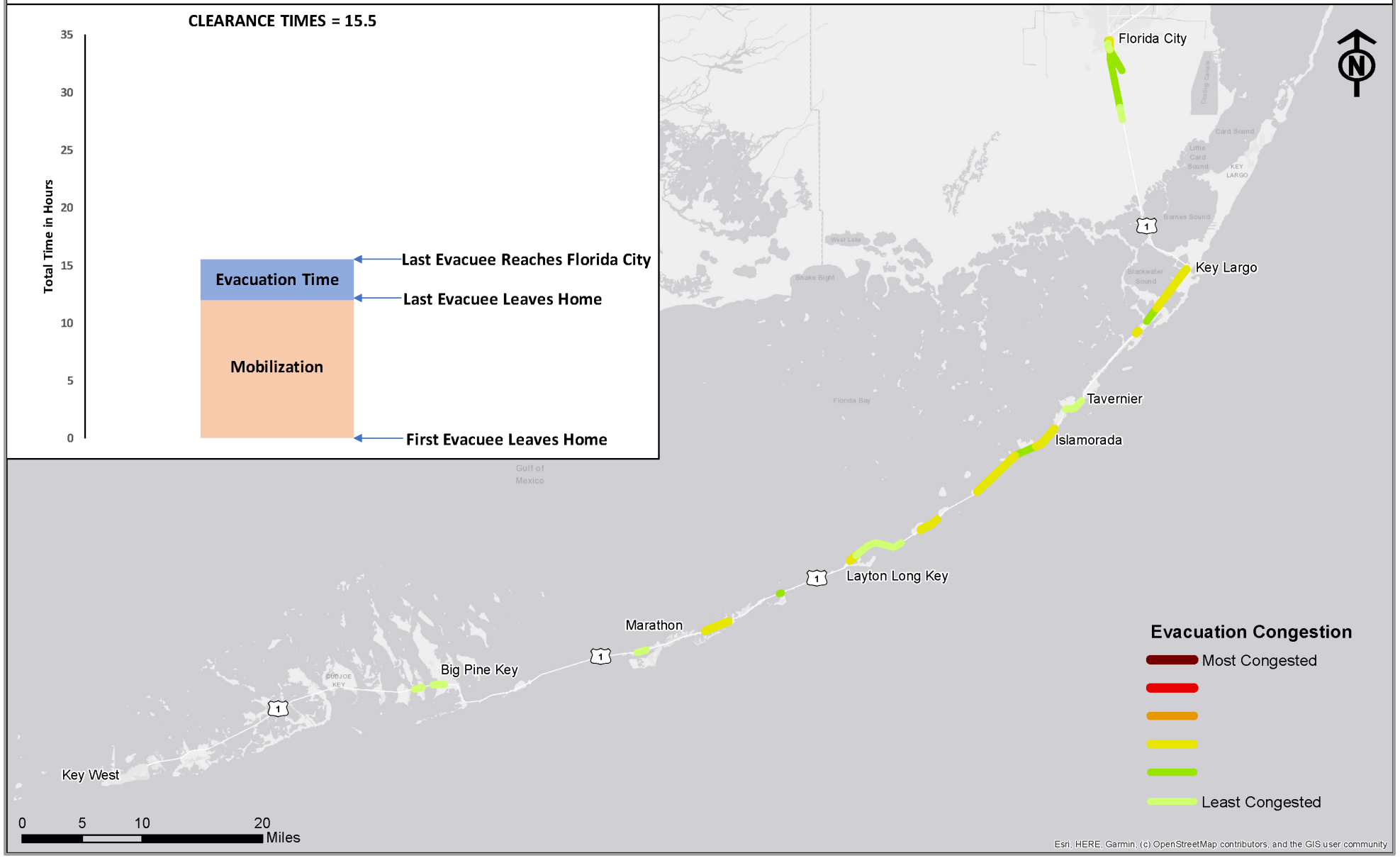
Key West is farther away from Florida City.



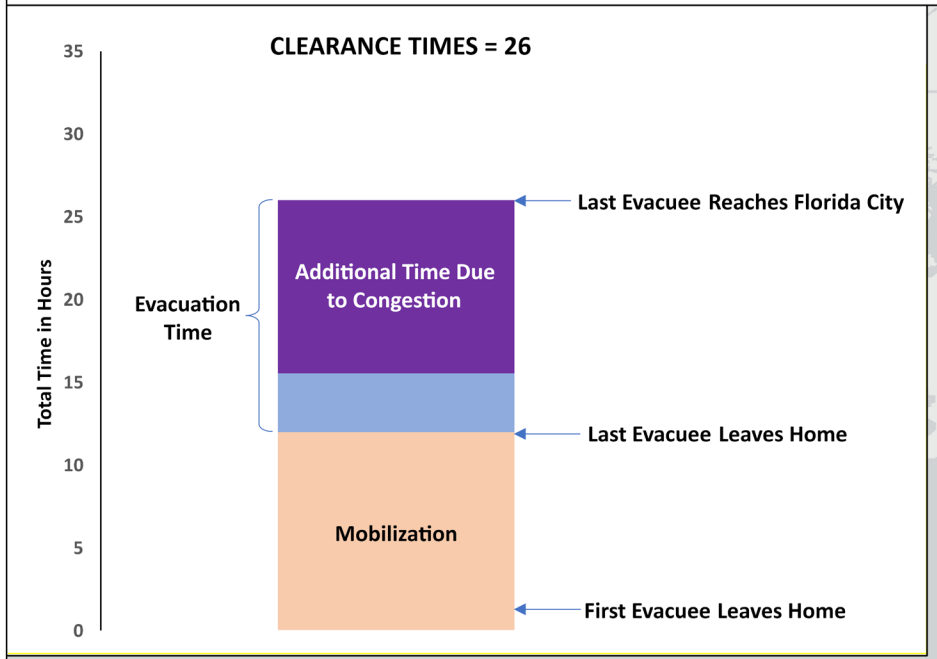



Less
Congestion
More
Congestion

Phase 2 No Allocations Excludes Key West and Includes Mobile Homes



Phase 2 No Allocations Including Key West and Mobile Homes



Baseline Modeling Recap

Baseline Modeling		Phases	Florida Keys Including Key West		Florida Keys Without Key West	
			Mobile Homes in Phase 2 (Vehicles)	Mobile Homes in Phase 1 (Vehicles)	Mobile Homes in Phase 2 (Vehicles)	Mobile Homes in Phase 1 (Vehicles)
Baseline Modeling	Shows Baseline- Does not include additional prospective allocations	Phase 2	26.0	24.0	15.5	15.5
		Phase 1	15.5	15.5	15.0	15.0

Baseline Modeling Results + Prospective Modeling

- Baseline Modeling is based on current Census and American Community Survey Data.
- Prospective Modeling adds dwelling units to the model to determine evacuation times if additional building permit allocations were permitted.
- The 2023 Hurricane Evacuation Model looked at five different prospective scenarios and evaluated the time it would take to evacuate the Keys.

Prospective Modeling for Possible Future Allocations

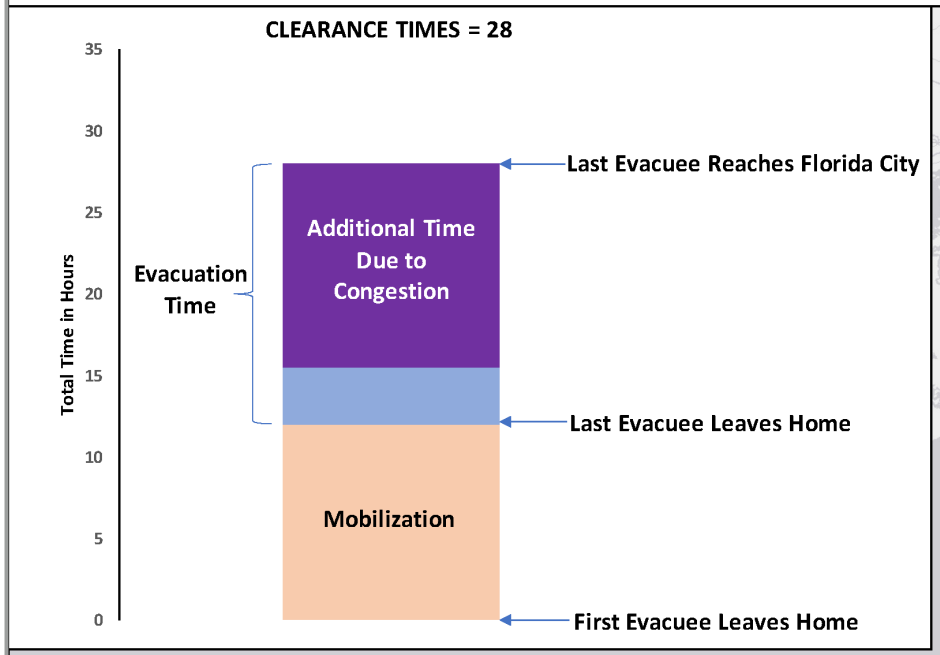
Clearance Times Summary

Deliverable 5: Baseline Modeling			Phases	Florida Keys Including Key West		Florida Keys Excluding Key West	
				Mobile Homes in Phase 2 (hours)	Mobile Homes in Phase 1 (hours)	Mobile Homes in Phase 2 (hours)	Mobile Homes in Phase 1 (hours)
Baseline Modeling		Shows baseline - does not include additional prospective allocations	Phase 2	26.0	24.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
Deliverable 6: Prospective Modeling for Future Allocations							
S1	3,550 Allocations	Distribute based on county/municipality population size	Phase 2	27.5	25.5	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S2	3,550 Allocations	Distribute based percentage of vacant lands per county/municipality	Phase 2	28.0	26.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S3	3,550 Allocations	Distribute based on current allocations: (1,970-Monroe, 300-Marathon, 280-Islamorada, 910-Key West, 30-Layton, 60-Key Colony Beach)	Phase 2	28.0	26.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S4	Minimal Allocations (11 allocations/yr)	Distributes Monroe County (5); Marathon (2); Islamorada (2); Key West (2 – affordable only)	Phase 2 (10 Years Growth)	26.5	24.0	15.5	15.5
			Phase 2B (20 Years Growth)	26.5	24.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S5	One Unit/Vacant Lot	Distributes 7,954 units	Phase 2	31.0	28.5	17.0	16.5
			Phase 1	15.5	15.5	15.0	15.0

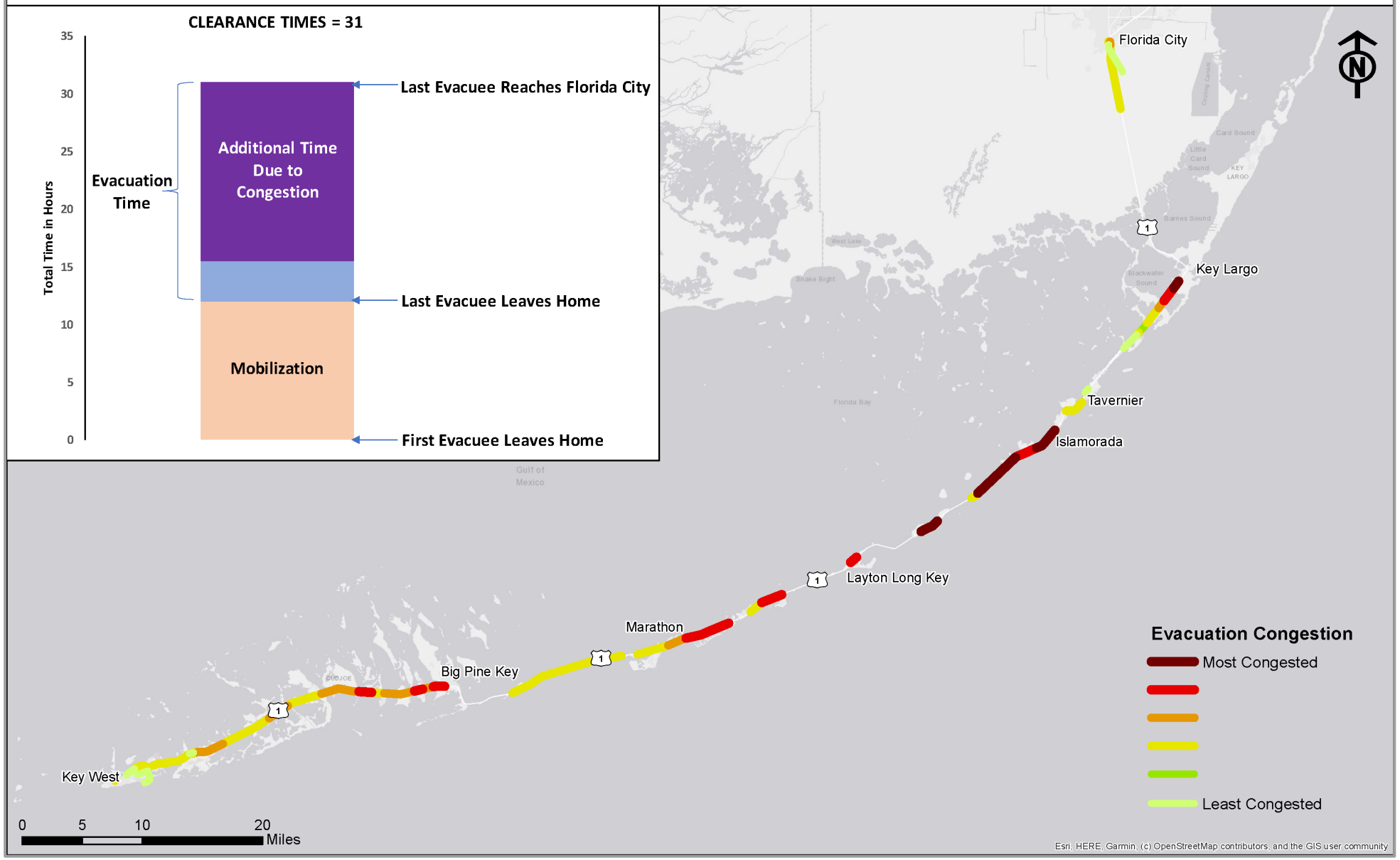
Vehicle Demographics Summary

Deliverable 5: Baseline Modeling			Phases	Florida Keys Including Key West		Florida Keys Excluding Key West	
				Mobile Homes in Phase 2 (vehicles)	Mobile Homes in Phase 1 (vehicles)	Mobile Homes in Phase 2 (vehicles)	Mobile Homes in Phase 1 (vehicles)
Baseline Modeling		Shows baseline - does not include additional prospective allocations	Phase 2	34,456	30,460	20,819	17,919
			Phase 1	12,896	17,305	6,934	10,113
Deliverable 6: Prospective Modeling for Future Allocations							
S1	3,550 Allocations	Distribute based on county/municipality population size	Phase 2	36,876	32,765	22,164	19,176
			Phase 1	12,896	17,305	6,934	10,113
S2	3,550 Allocations	Distribute based percentage of vacant lands per county/municipality	Phase 2	37,214	33,101	22,612	19,623
			Phase 1	12,896	17,305	6,934	10,113
S3	3,550 Allocations	Distribute based on current allocations: (1,970-Monroe, 300-Marathon, 280-Islamorada, 910-Key West, 30-Layton, 60-Key Colony Beach)	Phase 2	37,208	33,096	22,189	19,201
			Phase 1	12,896	17,305	6,934	10,113
S4	Minimal Allocations (11 allocations/yr)	Distributes Monroe County (5); Marathon (2); Islamorada (2); Key West (2 – affordable only)	Phase 2 (10 Years Growth)	34,646	30,536	20,948	17,961
			Phase 2B (20 Years Growth)	34,721	30,609	20,992	18,004
			Phase 1	12,896	17,305	6,934	10,113
S5	One Unit/Vacant Lot	Distributes 7,954 units	Phase 2	40,489	36,377	24,726	21,738
			Phase 1	12,896	17,305	6,934	10,113

Phase 2 Current Allocation Includes Key West and Mobile Homes



Phase 2 Maximum Allocation Includes Key West and Mobile Homes



Questions & Answers

Contact Us

Thank You.

If you have questions or comments about this presentation, please contact us.



Bureau of Community Planning and Growth
Email: FLKeysEvac@Commerce.fl.gov

Methodology and Data

2023 Florida Keys Hurricane Evacuation Modeling

Prepared for: *Florida Department of Commerce*
Date: *12.01.2023*

Prepared by:
Whitman, Requardt & Associates, LLP
1201 Edwards Mill Road, Suite 320
Raleigh, NC 27607

Table of Contents

1 Introduction 3

2 Transportation Interface for Modeling Evacuations 4

3 Demographic Data 6

4 Roadway Network Modifications 16

5 Modifications of TIME Model Scripts 18

6 Scenario Analysis 20

Appendix A – Early Out Unit Allocation Distribution 30

Appendix B – Network Link Modifications 31

Appendix C – TEZ Allocation Distribution 37

Appendix D – Graphs and Maps 43

1 INTRODUCTION

This document represents a 2023 update to a similar effort previously conducted in 2012. The purpose of this effort was to calculate hurricane evacuation clearance times to support the Florida Department of Commerce, in its capacity as the state land planning agency, to assist the local governments in meeting a statutory requirement by updating the data for the Florida Keys Evacuation Model as professionally acceptable sources of information were released pursuant to Administration Commission rules. This document details the data, data sources, tools, and methods used to calculate evacuation clearance times for the Florida Keys. For the purposes of this study, these evacuation clearance times represent the time it takes from when an evacuation first begins (as measured from when an order to evacuate is first given) to when the last evacuee reaches Florida City. These clearance times are used as the determining metric as to whether an evacuation can be completed within 24 hours.

The data, tools, and methods used in this study accord with professionally accepted methodologies and was conducted on behalf of the state's land planning agency, the Florida Department of Commerce. Data was sourced from the U.S. Census, the American Community Survey, the Florida Department of Transportation, Florida's Regional Planning Councils, county emergency managers, the U.S. Navy, and others. The methods used are those that are integrated in the Transportation Interface for Modeling Evacuations (TIME). TIME is a custom-built evacuation model developed for the Florida Division of Emergency Management (FDEM) and used by FDEM since 2010 to calculate evacuation clearance times for hurricane evacuation studies across Florida and covering every county in the state.

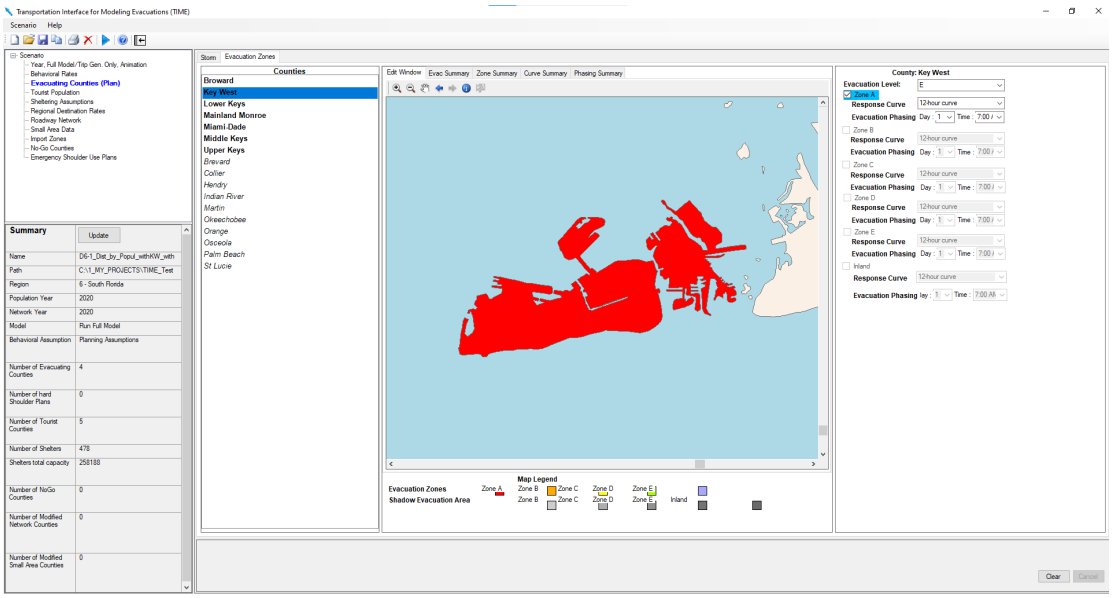
To conduct this transportation analysis and evacuation modeling, the Florida Department of Commerce contracted the services of Whitman, Requardt and Associates, LLP (WRA). WRA is a full-service engineering, architectural, construction management and environmental firm. Established in 1915, WRA's services focus on the needs of state highway transportation agencies, local governments, and transit agencies. WRA's transportation group has over 400 staff addressing transportation planning, traffic engineering and modeling, design, and environmental challenges. The WRA project manager, Roberto Miquel, was part of the original model development team that developed TIME back in 2010 and has been maintaining and updating that model on behalf of FDEM since. He was also involved in the previous 2012 Florida Keys hurricane evacuation modeling study.

2 TRANSPORTATION INTERFACE FOR MODELING EVACUATIONS

The Transportation Interface for Modeling Evacuations (TIME) is the standard modeling system used by the State of Florida to simulate hurricane evacuation scenarios for the purposes of measuring evacuation clearance times. TIME was initially developed in 2010 by the Statewide Regional Evacuation Study Program (SRESP) to serve as a standardized platform for conducting transportation analyses for hurricane evacuation studies throughout Florida. The purpose of the SRESP is to ensure that hurricane evacuation studies in Florida are conducted at a regional level. This encourages each county's emergency management office to properly account for the impacts to their own residents when ordering an evacuation during an event in which neighboring counties may also be evacuating.

TIME contains a statewide database of demographic data for each county separated into small area geographies known as Traffic Evacuation Zones (TEZ). These TEZs contain data concerning the population of Florida relevant to evacuation modeling. Data include numbers of households separated by dwelling unit type (site-built vs. mobile home), vehicle ownership, population, hotel/motel units expressed as rooms, and university dwelling units. TIME also contains data concerning the roadway system throughout Florida. This roadway system database is focused only on those facilities relevant to evacuating traffic and includes all evacuation routes, major roads, and other facilities as needed to convey evacuees from their points of origins onto the evacuation route system. TIME includes a comprehensive database of evacuation shelters. **Figure 1** shows an image of TIME. Additional information concerning the technical details of TIME can be found in the model's technical documentation.[1]

Figure 1 The Transportation Interface for Modeling Evacuations



[1] Whitman, Requardt & Associates, LLP. (2022). *Evacuation Study Methodology and Support Documentation: Chapter II: Evacuation Model Technical Document*. Florida Division of Emergency Management. https://portal.floridadisaster.org/preparedness/RES/Studies/Shared%20Documents/Supporting%20Documents/Evacuation%20Study%20Methodology/Chapter%20II%20Evacuation%20Transportation%20Model%20Technical%20Document.pdf

Prior to this study, TIME was updated in 2021 to meet the needs of the latest round of regional hurricane evacuation studies. This update included the following:

- 2019 American Communities Survey data to update the demographics in the model,
- An updated roadway network database,
- An updated evacuation shelter database, and
- New behavioral data explaining how Florida residents evacuate including their likelihood of evacuating and their likely destinations.

For the current Florida Keys evacuation study, the 2021 version of TIME was used as a starting point. From this, it was necessary to review and update the model. This review and update process focused on the following three features:

- *Demographic Data* – Since the 2021 update to TIME was completed, the 2020 Decennial Census data has become available. Also, updated information concerning vacation rentals, available vacant land, and Navy personnel has been made available. Demographic data for the Florida Keys was updated to reflect the new data. This is discussed in **Section 3** of this report.

- *US 1* – As the only road in and out of the Florida Keys, US 1 was thoroughly reviewed for accurate coding in the model. This is discussed in **Section 4** of this report.

- *TIME Modeling Methodology* – Up to and including the 2021 update, TIME made assumptions concerning excluding mobile home populations from the Florida Keys for default modeling scenarios for use in statewide modeling. These assumptions had to be revisited for the current study. This is discussed in **Section 5** of this report.

3 DEMOGRAPHIC DATA

The purpose of this section is to describe the process undertaken to update the Monroe County socioeconomic data to 2020 for the Transportation Interface for Modeling Evacuations (TIME). It addresses those socioeconomic variables in TIME that are directly available from the U.S. Census Bureau or derived from the U.S. Census Bureau as well as information concerning vacation rentals, early out units, and naval personnel.

3.1 Census Data Sources

The primary data source used in this analysis is the 2016 – 2020 American Community Survey (ACS) and the 2020 Decennial Census (PL94-171). While the PL94-171 file provides information on the total population, total housing units, and housing by occupied and vacant units by Census block, the ACS data provides the more detailed information about single family, multi-family, mobile homes as well as vehicle availability.

3.1.1 Redistricting Data Summary File (P.L. 94-171)

Public Law 94-171 directs the Census Bureau to provide the data that may be used for redistricting to the governors and the officers or public bodies having responsibility for redistricting in each of the 50 states. This file includes demographic and housing characteristics about detailed geographic areas including states, counties, and places. The subjects covered include voting age, race, Hispanic or Latino origin, housing occupancy status, group quarters population by major group quarters type at the Census block level.

The following variables are used from the PL 94-171 file:

- Total Population
- Total Housing Units
    - Occupied Housing Units
    - Vacant Housing Units

3.1.2 2016 – 2020 American Community Survey (ACS)

The American Community Survey (ACS) is a nationwide survey designed to provide communities with reliable and timely social, economic, housing, and demographic data every year. A separate annual survey, called the Puerto Rico Community Survey (PRCS), collects similar data about the population and housing units in Puerto Rico. The Census Bureau uses data collected in the ACS and the PRCS to provide estimates on a broad range of population, housing unit, and household characteristics for states, counties, cities, school districts, congressional districts, census tracts, block groups, and many other geographic areas.

The ACS has an annual sample size of about 3.5 million addresses, with survey information collected nearly every day of the year. Data are pooled across a calendar year to produce estimates for that year. As a result, ACS estimates reflect data that have been collected over a period of time rather than for a single point in time as in the decennial census, which is conducted every 10 years and provides population counts as of April 1 of the census year.

ACS 1-year estimates are data that have been collected over a 12-month period and are available for

geographic areas with at least 65,000 people. Starting with the 2014 ACS, the Census Bureau is also producing "1-year Supplemental Estimates"—simplified versions of popular ACS tables—for geographic areas with at least 20,000 people. The Census Bureau combines 5 consecutive years of ACS data to produce multiyear estimates for geographic areas with fewer than 65,000 residents. These 5-year estimates represent data collected over a period of 60 months.

The main categories of data used from the 2016-2020 ACS (as there are numerous subcategories under each) for this analysis are:

- Total Housing Units, by Units in Structure (B25024, Subcategories B25024_001-011)
- Occupied Housing Units, by Units in Structure (B25032, Subcategories B25032_001-023)
- Residents by Tenure, by Units in Structure (B25033, Subcategories B25033_001-013)
- Aggregate Vehicles by Tenure (B25046, Subcategories B25046_001-003)

Using these two main sources, the unit, population, and vehicle data needed for the TIME Model small area data is calculated into two main groupings: Derivation of Main SRESP Inputs and Derivation of Additional SRESP Inputs.

3.1.3 TIME Inputs

The main TIME inputs are those which proportion out mobile home and site-built unit data from the overall unit data totals for the following attribute types:

- Total Housing Units
- Occupied Housing Units
- Residents in Occupied Housing Units
- Vehicles in Occupied Housing Units

Secondary TIME inputs are those which proportion out single-family and multi-family from the overall site-built units only. Single-family site-built units are defined in ACS data subcategory as "1, detached" dwelling unit while multi-family site-built units are those dwelling units which are not defined as "1, detached", "Mobile home", or "Boat, RV, Van, etc.". The following attribute types for the secondary inputs are:

- Total Site-Built Units
- Occupied Site-Built Units
- Residents in Occupied Site-Built Units
- Vehicles in Occupied Site-Built Units

3.2 Methodology to Map TEZ Geography to Census Geography

To get the SRESP inputs onto the TEZs, it was necessary to map the Census data onto the TEZs. To achieve this, it was critical to ensure that the geographies of both the TEZ file and the Census Block Group (ACS data for the variables of interest is not available at the block-level) have the same coordinate system. The TEZs follow WGS 84 / UTM zone 17N coordinate reference system and there are 40 TEZs in Monroe County. The Census Block Groups follow the NAD83 coordinate reference system and there are 70 Block Groups in Monroe County. Therefore, the first step undertaken was to reproject the Census Block Groups so that it was in the same coordinate reference system as the TEZs. This reprojection was undertaken using the built-in processes in QGIS where the Census Block Group

geography file was reprojected from NAD83 to WGS 84/UTM zone 17N.

Once both geographies were in the same coordinate reference system, they were joined spatially by using an intersect join in QGIS. The Census Block Group was joined to features in the TEZ file where Block Group features intersected[2] the TEZ features. The join type was specified to take attributes of the feature with the largest overlap only. This was done to ensure that each Block Group was associated with a TEZ. This join resulted in almost all Block Groups having a single TEZ associated with it, except for ten TEZs that resulted in having more than one Block Group associated with them. **Table 1** shows the Block Groups and the associated TEZs.

Table 1 Block Groups with Multiple TEZs

Block Group GEOID	TEZID	TEZID
120879709003	1232	1233
120879714021	1223	1225
120879718001	1218	1219
120879727003	1244	1245
120879800001	1246	1247

The Census data for these ten TEZs were allocated equally. 50-percent of the demographic data from one Block Group was allocated to one TEZ associated with the Block Group and the other 50-percent of the demographic data was allocated to the other TEZ associated with the same Block Group.

Once all TEZs were assigned to individual Block Groups, the data was aggregated by TEZ to create the required SRESP inputs unique to each TEZ.

3.2.1 Normalizing to 2020 Census Totals

The ACS estimates are normalized to 2020 Census data for population total, and occupied housing units. The reason for doing this is to anchor our estimates to the 2020 Census and not to the ACS. The way this was done for the various subcategories such as single family, multi family, mobile homes etc. was to take the 2020 Census (P.L. 94-171) data and multiply that by the distribution of the subcategories in each TEZ.

3.2.2 Vehicles by Occupied Households

The Census provides the total number of vehicles by occupied households and does not distinguish between site built and mobile homes. In order to obtain the number of vehicles by occupied site built and mobile homes, the total vehicles by occupied households were proportionally allocated by the percent of occupied site built and mobile homes in each TEZ. The vehicles occupied by site-built households were further allocated into single family and multiple family occupied households.

3.3 Distribution of Census Data

Table 2 shows the 2020 SRESP Inputs for site built and mobile homes.

[2] Two features are considered to intersect if their geometries share at least one point in common. This relationship includes cases where one feature is entirely contained within another, as well as cases where features partially overlap.

Table 2 2020 SRESP Inputs

SRESP Input	Upper Keys	Middle Keys	Lower Keys	Key West	Rest of Monroe	Monroe County
Total Units	17,268	9,938	9,901	16,836	18	53,961
Total Single Family (Site Built)	10,029	4,952	7,700	6,920	-	29,601
Total Multi Family (Site Built)	4,824	3,960	725	8,805	18	18,332
Total Mobile (including Boat, RV, Van)	2,415	1,026	1,474	1,114	-	6,029
Total Occupied Units	10,233	5,741	6,813	13,631	18	36,436
Occupied Single Family (Site Built)	6,743	3,121	5,102	5,668	-	20,634
Occupied Multi Family (Site Built)	2,246	2,023	664	6,909	18	11,860
Occupied Mobile (including Boat, RV, Van)	1,229	597	1,044	1,051	-	3,921
Total Population	22,682	12,634	15,238	32,240	80	82,874
Occupied Population Single Family (Site Built)	16,550	7,912	12,093	17,778	-	54,333
Occupied Population Multi Family (Site Built)	3,773	3,453	974	11,279	80	19,559
Occupied Population Mobile (including Boat, RV, Van)	2,360	1,269	2,173	3,185	-	8,987
Vehicles by Occupied Mobile Homes (including Boat, RV, Van)	1,893	628	1,775	1,486	-	5,782
Vehicles by Occupied Site Built Homes	12,015	7,190	9,956	17,269	-	46,430

Source: U.S. Census Bureau. 2020 PL 94-171 and 2016 – 2020 ACS.

In order to identify the growth in the County since 2010, a comparison was made with the 2006 – 2010 ACS to determine the changes between 2010 and 2020. This is shown in **Table 3**. While there has been an overall increase in the site-built homes, actual residential occupancies have remained relatively flat over the course of the decade. Furthermore, the number of available vehicles has gone down. This coincides with a general reduction in the mobile home population within the Florida Keys.

Table 3 Growth Changes between 2010 and 2020

Total	2020	2010
Site-Built Homes		
Total Dwelling Units	47,933	46,412
Occupied Units	32,494	32,168
Vehicles	46,430	50,156
Mobile Homes		
Total Dwelling Units	6,029	9,002
Occupied Units	3,921	5,807
Vehicles	5,782	9,039

3.4 Non-Census Demographic Data

The four major areas in Monroe County considered for this study are the Upper Keys, Middle Keys, Lower Keys, and Key West. Mainland Monroe County comprised primarily of undeveloped land in the Everglades is not considered for this study. Monroe County/Florida Keys in TIME is comprised of Traffic Evacuation Zones (TEZs) 1208 to 1247. **Table 4** shows the TEZ number ranges included in each Monroe County area. Modifications to the TEZ demographic data were performed according to each specific evacuation scenario; however, preliminary modifications were necessary to incorporate non-permanent resident data.

Table 4 TEZs per Monroe County Area

MONROE COUNTY AREAS	TEZ RANGES
Key West	1208-1219
Lower Keys	1220-1225
Middle Keys	1226-1231
Upper Keys	1232-1245

3.4.1 Vacation Rentals

Information on a total of 3,668 vacation rentals was provided by the localities for Islamorada, Key Colony Beach, Marathon, Key West, and Monroe County. The spreadsheet for Monroe County listed a combination of vacation rental addresses for Key Largo, Key Haven, Tavernier, Stock Island, Cudjoe Key, and Big Coppitt Key, which were added to the corresponding areas in the county. The total number of vacation rentals per area is shown in **Table 5**.

Table 5 Distribution of Vacation Rentals

	Monroe County Areas			
	Upper Keys	Middle Keys	Lower Keys	Key West
Key West Transient Rentals	0	0	0	860
Vacation Rental Islamorada	259	0	0	0
Vacation Rental Key Colony Beach	0	641	0	0
Vacation Rental Marathon	0	1,248	0	0
Vacation Rental Monroe County (VR Exemption)	593	5	21	41
Total Vacation Rental Units	852	1,894	21	901

Furthermore, a check was performed to verify the additional number of vacation rentals did not exceed

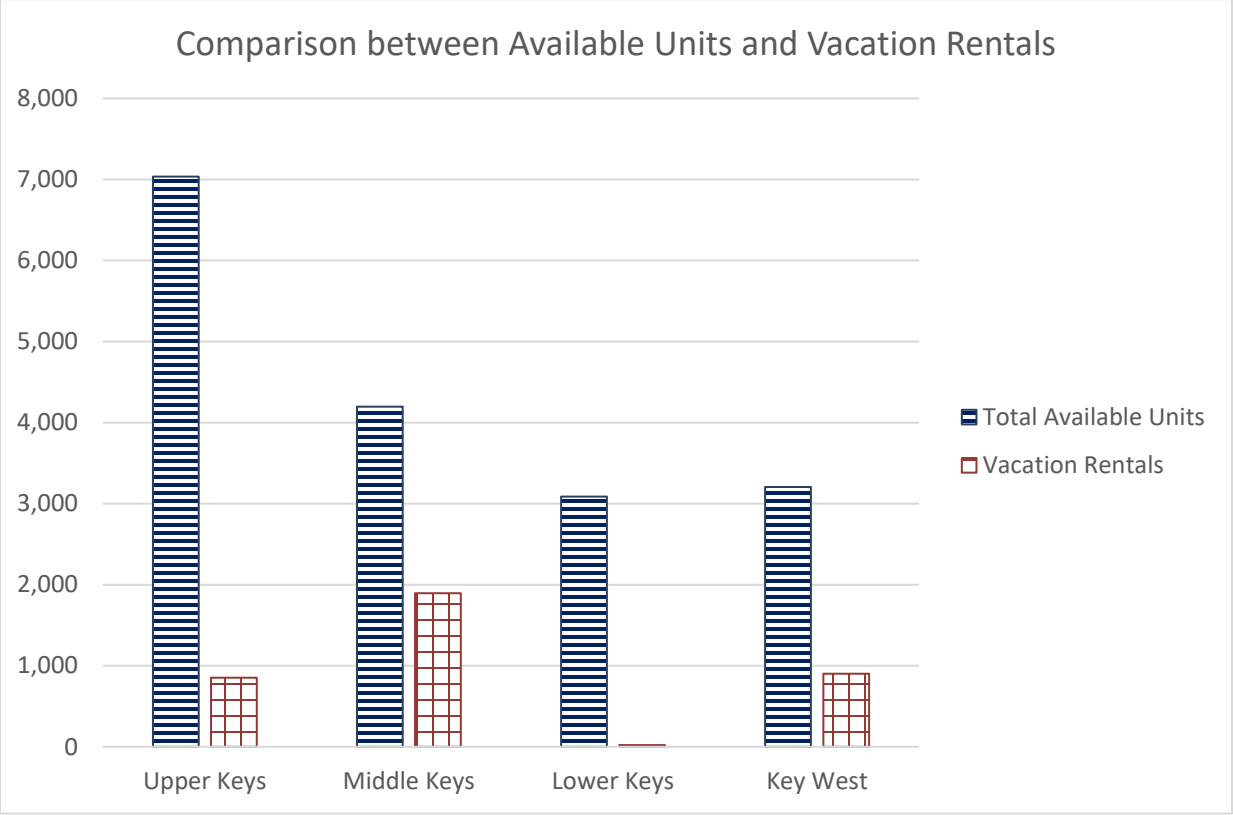
the total number of available (not permanently occupied) units. **Table 6** shows the total available units for each area of the Florida Keys defined as the difference between the total units and the total occupied units for each area.

Table 6 Total Available (Not Permanently Occupied) Units

	Upper Keys	Middle Keys	Lower Keys	Key West
Total Units (TUs)	17,268	9,938	9,901	16,836
Total Occupied Units (TOUs)	10,233	5,741	6,813	13,631
Total Available Units	7,035	4,197	3,088	3,205

Figure 2 compares the number of total available units to the number of vacation rental units. As can be seen, there are fewer vacation rental units than there are total available units. This confirms that sufficient unoccupied housing stock exists in each area of the Florida Keys to account for the presence of vacation rentals thus establishing consistency between the vacation rental data and the Census-based demographic data.

Figure 2 Comparison between Total Available Units and Vacation Rentals by Area



Once all vacation rental addresses were verified and properly categorized, an online geocoding service[3] was used to obtain the corresponding geographic coordinates to associate each vacation rental with a model TEZ.

3.4.2 Early-Out Units

Table 7 shows the early out unit information. Early out units are those residential units that have been permitted for the Florida Keys on the condition that their inhabitants would evacuate during Phase I. A total of 1,200 early out units were identified and allocated as follows: Key West (300), Islamorada (300), Marathon (300), and Monroe County (300). The 300 early outs for Monroe County were evenly distributed among the Upper, Middle, and Lower Keys.

Table 7 Number of Early-Out Units Added to TEZs per County

AREA	EARLY-OUTS
Key West	300
Lower Keys	100*
Middle Keys	400*
Upper Keys	400*

* 300 for Monroe County, split evenly between Lower, Middle, and Upper Keys

A proportionality analysis was conducted to determine how to distribute the given number of units among the TEZs within the four Monroe County areas. The early out units were distributed based on the proportions of each county/municipality permanent population size using the 2020 SRESP Input data. From the given totals for each area shown in **Table 7**, the early out units were allocated among the TEZs. Proportionality percentages and TEZ allocation distributions for each area are given in **Appendix A**.

3.4.3 Naval Personnel

The Navy provided information on assigned personnel at Naval Air Station Key West (NASKW). This information distinguished between assigned personnel who were considered part of the permanent population and temporary duty assignments who were considered as part of the non-permanent population. Data was provided in terms of evacuating vehicles associated with each population group. These vehicles were used as direct inputs to the model. For the permanent population portion of the NASKW data, the vehicle estimations were included in the respective TEZs as shown in **Table 8.**

[3] Geoapify Online Geocoding Tool, Copyright 2023 - https://www.geoapify.com/tools/geocoding-online

Table 8 Vehicle Estimates for Military Permanent Population

MILITARY VEHICLE ESTIMATES PER TEZ – PERMANENT POPULATION		
TEZ	**LOCATION**	**VEHICLE ESTIMATE***
1208	Truman Annex Bachelor Housing	60
1209	Truman Annex Dwelling and Other Family Units	147
1214	Trumbo Point Annex Bachelor Housing, Sigsbee Park Annex, Navy Branch Health Clinic Housing,	840
1215	Trumbo Point Annex Dwelling	174

*Source: 2023 NASKW Hurricane Evacuation Spreadsheet

To account for the NASKW non-permanent population, the vehicle estimations were included in the respective TEZs as shown in **Table *9***. Naval personnel were accounted for in the SPEC_GEN field of the TEZ layer of the model.

Table 9 Vehicle Estimates for Military Non-Permanent Population

MILITARY VEHICLE ESTIMATES PER TEZ – NON-PERMANENT POPULATION		
TEZ	**LOCATION**	**VEHICLE ESTIMATE****
1209	Truman Annex	52
1214	Trumbo Point Annex, MWR Townhouses and Trailers, Sigsbee Park Annex & RV Park	541
1215	Fleming Key Army Barracks	25
1220	Boca Chica Marina Moorings and Slips	37*

* Source spreadsheet combines Moorings and Slips between the Boca Chica and Sigsbee marinas for a total of 75. Therefore, 37 was added to TEZ 1220 (Boca Chica) and 38 to TEZ 1214 (Sigsbee).
**Source: 2023 NASKW Hurricane Evacuation Spreadsheet

3.4.4 University Population

The population for the College of the Florida Keys, formerly known as Florida Keys Community College, is accounted for as non-permanent residents. Lagoon Landing student apartments is designated for university housing with 4-bed and 5-bed unit, servicing approximately 100 beds. Therefore, 100 units were accounted for in Key West, TEZ 1216, and entered into the SPEC_GEN field in lieu of the D_UNIV field of the TEZ layer.

3.4.5 Tourist Occupancy

As discussed earlier in Section 3.4, the vacation rentals (Table 5) and early-out units (Table 7) were added to the TEZ layer of the network and treated as site-built units. Mobile home data was not used in the Phase I test run but was instead replaced by Boat/RV/Van data. Additionally, hotel/motel tourist occupancy rates were updated. Monthly occupancy rates were provided for Monroe County, Key West, Marathon, and Key Largo from 2019 to 2023. From this data, the 2020 COVID year was removed, and the rates recalculated to avoid skewness from the COVID year anomaly. Once recalculated, the July average rates were applied, as shown in **Table 10**, as this month represents the peak hurricane season.

Table 10 Tourist Occupancy Rates

TOURIST OCCUPANCY RATES USED	
Key West	85%
Lower Keys	83%**
Middle Keys	83%
Upper Keys	79%

** No data provided for the Lower Keys, therefore the Middle Keys rate was used

3.4.6 Accounting for Future Allocations

As the purpose of this study is to determine the impacts to evacuation clearance times in the Florida Keys due to additional development, it is necessary to be able to account for growth within the model. This growth is represented in each scenario that is modeled by a budget of dwelling units that is allocated throughout the Florida Keys to represent different growth scenarios. TIME uses a TEZ geodatabase feature to house the input demographic data for each model run. For the Florida Keys evacuation scenarios, the following demographic variables were modified when including additional allocations:

- DTSB_20 – Number of site-built dwelling units – Total
- ODTSB_20 – Number of occupied site-built dwelling units – Total
- PTSB_20 – Population in occupied site-built dwelling units – Total
- VTSB_20 – Number of vehicles in occupied site-built dwelling units – Total
- PCTSO_20 – Percent of site-built dwelling units occupied – Total
- PHTSB_20 – Persons per occupied site-built dwelling unit – Total
- VHTSB_20 – Vehicles per occupied site-built dwelling unit - Total

When allocations are added to the DTSB_20 attribute variable, the subsequent calculations are performed to revise the associated attributes:

- ODTSB_20 = DTSB_20 * PCTSO_20
- PTSB_20 = ODTSB_20 * PHTSB_20

- VTSB_20 = ODTSB_20 * VHTSB_20

All scenarios that incorporate future year allocations of dwelling units assume the following:

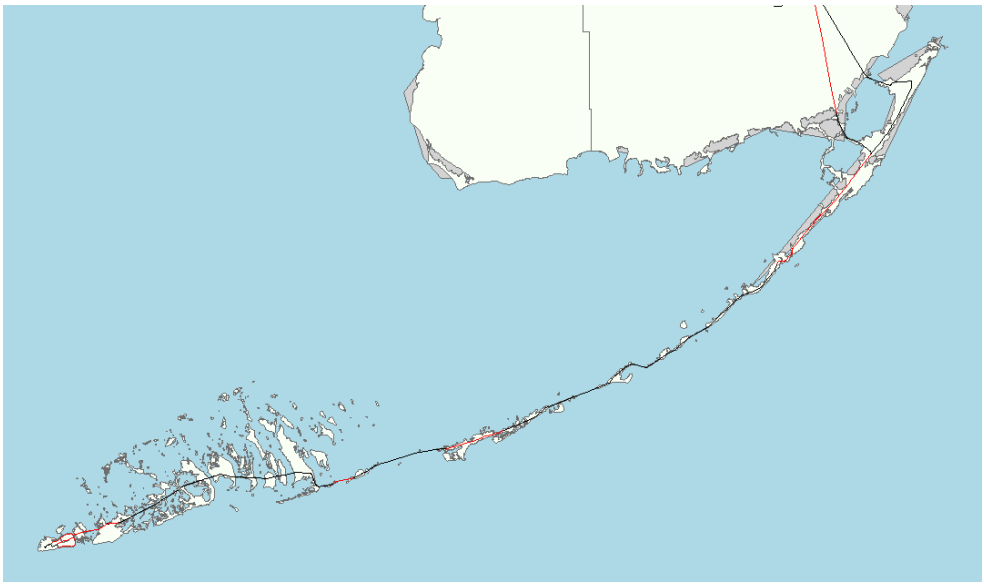
- The future dwelling units are site-built units.
- The future dwelling units are occupied by permanent residents.
- Residents of these future dwelling units will only evacuate in Phase II.

More information concerning the allocation-based scenarios is given in **Section 5**.

4 ROADWAY NETWORK MODIFICATIONS

All network links in TIME from Key West to Florida City along US Highway 1 (Overseas Highway) were checked and edited, if necessary, to match the 2020 conditions. Specifically, roadway links beginning at the intersection of US 1 and Card Sound Road (SR 905) to Truman Avenue in Key West were analyzed for inaccuracy. **Figure 3** shows the TIME network of the Florida Keys from the Upper Keys to Key West.

Figure 3 TIME Network Model



The Memorandum of Understanding – Exhibit 6 Table, dated August 2, 2012[4] is the primary source of information used to verify that the MSEG (segment ID), FLKEYCAP (hourly lane capacity), MMKEYLANE (number of lanes), and MMKEYCAP (hourly lane capacity) network link fields in the model concurred with the agreed upon methodology for determining roadway capacities in the Florida Keys for the purposes of evacuation modeling. In addition, 2020 Google Earth imagery was utilized to ensure that the facility type, area type, and number of lanes were coded accurately in the model network. **Table 11** lists the network link attributes examined.

[4] The source data for this MOU Exhibit 6 table is from the Florida Department of Transportation: Letter to Department of Community Affairs on June 18, 2010 – Table 2A and 2B; Statewide Regional Evacuation Study for the South Florida Region

Table 11 Analyzed Network Link Fields

Network Link Fields	Source Comparison
MSEG	MOU Exhibit 6 Table
LANE_20	Google Earth
FTYPE_20	Google Earth
ATYPE_20	Google Earth
FLKEYCAP	MOU Exhibit 6 Table
MMKEYCAP	Match FLKEYCAP
MMKEYLANE	MOU Exhibit 6 Table Match LANE_20

In the TIME evacuation model, approximately 350 roadway network links in the FL Keys were examined for accuracy among the fields mentioned in Table 11. Extensive changes were made as discrepancies for 145 links were corrected to meet the 2020 roadway conditions. All changes were achieved using ArcMap 10.8.1. A table identifying all updated highway network links for this study is found in **Appendix B**.

5 MODIFICATIONS OF TIME MODEL SCRIPTS

Evacuation policy for the Florida Keys distinguishes between two phases. Phase I is the first 24 hours of an evacuation. Phase II is the second 24 hours of an evacuation. TIME version 2022 04.26.14 (as well as earlier versions of TIME) assumed that the standard policy for evacuations in the Florida Keys was that mobile home residents evacuate in Phase I. The TIME model assumed that Phase I occurs before the evacuation of the general population and therefore only modeled Phase II evacuations for the Florida Keys. As a result, the programming of the model did not allow the mobile home population to evacuate in Phase II. This restriction was only in effect for the Florida Keys and did not impact how evacuations were modeled in TIME for the rest of the state. In the prior 2012 study, targeted adjustments to the model were required to allow TIME to simulate a Phase I evacuation. These adjustments were specific to a single Phase I scenario and were not intended to impact how TIME would be used for evacuation modeling throughout the rest of Florida.

To accommodate the needs of the current study, it was necessary to modify the way in which TIME deals with evacuations in the Florida Keys. The Department identified a need to be able to consider different definitions of Phase I and Phase II population groups. In particular, the Department wanted to be able to test the impacts of assigning the mobile home population in the Florida Keys to either Phase I or Phase II. To accomplish this, the portions of TIME that dealt with the evacuation of the mobile home population in the Florida Keys had to be reprogrammed.

5.1 Methodology Change

The primary change made to TIME for this study was to alter the underlying assumption concerning what evacuations could be modeled by default for the Florida Keys. Rather than defaulting to modeling only Phase II evacuations, it was necessary to build the flexibility to model any scenario foreseeable by the Department. To that end, it was necessary to remove the restrictions in TIME that permitted that only Phase II evacuations could be modeled in the Florida Keys. A methodology meeting was held with Department staff on July 17, 2023. At this meeting, it was decided that the most appropriate course of action was to remove the elements of the TIME program that enforced a Phase II-only evacuation for the Florida Keys. This change would permit mobile homes to evacuate in every scenario by default.

Rather than relying on pre-programmed assumptions as to whether mobile homes (or any other population group) can evacuate in a given scenario, the updated methodology now relies entirely on the TEZ demographic data developed for a given scenario. To simulate a Phase II evacuation in which mobile homes are expected to evacuate in Phase II, the TEZ demographic data must include the mobile home population for the Florida Keys. To simulate a Phase II evacuation in which mobile homes evacuate in Phase I, it is now necessary to remove the mobile home population from the TEZ demographic data. The presence of relevant data (mobile homes, site-built homes, military personnel) in a scenario's TEZ demographic database is now the sole factor in determining whether a population group is eligible to evacuate in a given scenario. Scenario specific TEZ demographic data were developed for each scenario modeled for this study.

5.2 Scripting Change

To make this change, it was necessary to alter the portions of the script that govern how the model operates. The TIME scripts were reviewed in their entirety to determine which portions of the model

governed the default assumptions concerning the manner in which evacuation trips are generated for the Florida Keys. Following this review, specific blocks of code were identified for further review and revision. The relevant scripts were then modified and the model tested with the changes to ensure that TIME would function properly using the revised methodology discussed earlier in this section.

Specifically, there was a series of conditional statements that defaulted mobile home evacuation participation rates to 0% for the Florida Keys. This would prevent mobile home dwelling units from generating any evacuation trips. These conditional statements were removed, thus allowing the true evacuation participation rates to be applied to mobile home households in the Florida Keys. No other sections of the model scripts needed to be altered. Testing of the model with the new scripts showed that the alterations had the intended effects, and no further complications or errors were discovered.

6 SCENARIO ANALYSIS

The purpose of this chapter is to define each evacuation scenario run performed for this study. The scenarios were conducted for two phases: evacuating non-permanent residents in Phase I and evacuating permanent residents in Phase II. Baseline model runs were completed for permanent and non-permanent residents which did not include additional prospective allocations. **Table 12** provides a description overview for baseline test run and future allocation scenarios.

Table 12 Scenario Descriptions for Test and Prospective Runs

RUN TYPE	SCENARIO NO.	SCENARIO DESCRIPTION
Baseline Modeling Runs	B1 B2	• Phase I and Phase II • Does not include additional prospective allocations
Prospective Modeling Runs	S1	• 3,550 prospective allocations distributed • Based on county/municipality population size
	S2	• 3,550 prospective allocations distributed • Based on percentage of vacant lands per county/municipality
	S3	• 3,550 prospective allocations distributed • Distribute based on current allocation pattern: ○ Monroe County - 1,970 ○ Marathon - 300 ○ Islamorada - 280 ○ Key West - 910 ○ Layton - 30 ○ Key Colony Beach - 60
	S4A	• Minimal Allocations (11 allocations/year) • 10 years of growth • Distributed among: ○ Monroe County – 5 ○ Marathon - 2 ○ Islamorada - 2 ○ Key West - 2 (affordable only)
	S4B	• Minimal Allocations (11 allocations/year) • 20 years of growth • Distributed among: ○ Monroe County – 5 ○ Marathon - 2 ○ Islamorada - 2 ○ Key West - 2 (affordable only)
	S5	• One unit per vacant lot • 7,954 units distributed

Additionally, prospective model runs for future allocations were completed on permanent residents and therefore assumed that only Phase II evacuations would need to be analyzed. As no future allocations were made for non-permanent residents, the results for the Phase I baseline modeling runs apply in all

cases. For both baseline and prospective model runs, evacuation scenarios included and excluded the Key West population and the mobile home population to examine the impact on the clearance times of Monroe County.

The four Key West/mobile home combinations run for each scenario described in **Table 12** are:

- Excluding Key West and excluding Mobile Homes
- Excluding Key West and including Mobile Homes
- Including Key West and excluding Mobile homes
- Including Key West and including Mobile Homes

As mentioned, scenarios in Phase I are for evacuating non-permanent residents, while Phase II for permanent residents. The differing populations represented for each phase is as follows:

- Phase I:
    - Non-permanent residents
    - Tourists
    - Occupants of Boats, RVs, and Vans
    - College students
    - Naval personnel on temporary duty assignment
- Phase II:
    - Permanent residents
    - Naval personnel assigned to NASKW

6.1 Baseline Model – Test Runs

6.1.1 Phase II Evacuation Scenarios

For the Phase II baseline test runs, the TIME scenarios were run using a 12-hour response curve at evacuation level E. **Table 13** lists additional parameter inputs for each run.

Table 13 TIME Input Parameters – Phase II Baseline Test Runs

ADDITIONAL SCENARIO INPUT PARAMETERS	
Region	South Florida
Behavioral Assumption	Planning Assumptions
Network Period	2020
Population Period	2020
Model	Run Full Model
University Population	Out of Session (0% in residence)
Shelter Status	Primary Open
Tourist Included	No

6.1.2 Phase I Evacuation Scenarios

For the Phase I baseline test runs, the TIME scenarios were run using a 12-hour response curve at evacuation level E. **Table 14** lists the additional parameter inputs for each run.

Table 14 TIME Input Parameters – Phase I Baseline Test Runs

ADDITIONAL SCENARIO INPUT PARAMETERS	
Region	South Florida
Behavioral Assumption	100% Response
Network Period	2020
Population Period	2020
Model	Run Full Model
University Population	Fall/Spring Session (100% in residence)
Shelter Status	Primary Open
Tourist Included	Yes (no override rates)

6.2 Prospective Model Runs for Future Allocations

Prospective model runs for future allocations were completed on permanent residents and therefore only Phase II evacuations were assumed. A proportionality analysis was conducted on all prospective model run scenarios to determine how to distribute the given number of allocations among the TEZs within the four Monroe County areas. The allocations were distributed based on the description of each scenario given in **Table 12**.

Further details for each scenario are provided in the following sections.

6.2.1 Scenario 1 (S1) – 3,550 Allocations Distributed Based on Population Size

For Scenario 1, 3,550 allocations were distributed based on the county/municipality population size. The allocations were allotted to each TEZ by first using the proportions of the populations within each of the four Florida Keys areas (**Table 15)** and then using the proportions among each area's TEZs. The exact number of units allocated to each TEZ for Scenario 1 is shown in Table 27 of **Appendix C**.

Table 15 Allocations per Area Distributed Based on Population Size – Scenario 1

AREA	POPULATION SIZE	DISTRIBUTION	ALLOCATION DISTRIBUTION
Key West	29,057	39.37%	1,398
Lower Keys	13,067	17.70%	628
Middle Keys	11,365	15.40%	548
Upper Keys	20,323	27.53%	976
	73,812		3,550

6.2.2 Scenario 2 (S2) - 3,550 Allocations Distributed Based on Vacant Lands

For Scenario 2, 3,550 allocations were distributed based on the percent of vacant lands per county/municipality. **Table 16** shows the total number of allocations for the four Monroe County areas. The exact number of units allocated to each TEZ for Scenario 2 is shown in Table 28 of **Appendix C**.

Table 16 Allocations per Area Distributed Based on Vacant Lands per Municipality – Scenario 2

AREA	VACANT LOTS	DISTRIBUTION	ALLOCATION DISTRIBUTION
Key West	84	1.1%	37
Monroe	6,086	76.5%	2,718
Marathon	764	9.6%	341
Islamorada	971	12.2%	433
Key Colony Beach	39	0.5%	17
Layton	10	0.1%	4
	7,954		3,550

6.2.3 Scenario 3 (S3) - 3,550 Allocations Distributed Based on Current Allocations

For Scenario 3, 3,550 allocations were distributed based on the patterns used for the current allocations per city, as shown in **Table 17**. Current allocations were provided for Key West, Marathon, Islamorada, Key Colony Beach, Layton, and Monroe County. The exact number of units allocated to each TEZ for Scenario 3 is shown in Table 29 of **Appendix C**.

Table 17 Allocations Per City/Area Distributed Based on Current Allocations – Scenario 3

CITY	TEZs	CURRENT ALLOCATIONS	NO. of TEZs	APPROX NO. of UNITS ALLOTTED PER TEZ
Key West	1208-1216	910	9	101
Monroe	1217-1225	1,970	9	219
Marathon	1226-1229	300	4	75
Islamorada	1230-1235	280	6	47
Key Colony Beach	1228	60	1	60
Layton	1230	30	1	30
		3,550		

6.2.4 Scenario 4 (S4) – Minimal Allocations (11 Allocations per Year)

For Scenario 4, the minimal allocations at 11 allocations per year were distributed among the TEZs for 10 years of growth (S4A) and 20 years of growth (S4B). The locations provided for distribution are Monroe County, Marathon, Islamorada, and Key West. **Tables 18 and 19** show the breakdown of which areas the units are allocated. The exact number of units allocated to each TEZ for Scenarios 4A and 4B is shown in Tables 30 and 31, respectively in **Appendix C**.

Table 18 Minimal Allocations per Area (11 allocations/year) for 10 Years of Growth - Scenario 4A

AREA	TEZs	NO. OF ALLOCATIONS	TOTAL ALLOCATIONS FOR 10 YEARS OF GROWTH	NO. of TEZs	UNITS IN EACH TEZ
Key West	1208-1216	2	20	9	2
Monroe	1217-1225	5	50	9	6
Marathon	1226-1229	2	20	4	5
Islamorada	1230-1235	2	20	6	3
			110		

Table 19 Minimal Allocations per Area (11 allocations/year) for 20 Years of Growth - Scenario 4B

AREA	TEZs	NO. OF ALLOCATIONS	TOTAL ALLOCATIONS FOR 20 YEARS OF GROWTH	NO. of TEZs	UNITS IN EACH TEZ
Key West	1208-1216	2	40	9	4
Monroe	1217-1225	5	100	9	11
Marathon	1226-1229	2	40	4	10
Islamorada	1230-1235	2	40	6	7
			220		

6.2.5 Scenario 5 (S5) – 7,954 Units Distributed

For scenario 5, 7,954 units were distributed proportionally among each area to correspond to the available vacant lots, one unit per vacant lot. The units were then approximately evenly distributed among the TEZs within each area. **Table 20** shows the vacant lot data provided for each area. The exact number of units allocated to each TEZ for Scenario 5 is shown in Table 32 of **Appendix C**.

Table 20 Allocations per Area Distributed as One Unit/Vacant Lot – Scenario 5

AREA	1 UNIT PER VACANT LOT
Key West	84
Unincorporated Monroe County	6,086
Marathon	764
Islamorada	971
Key Colony Beach	39
Layton	10
	7,954

For all Phase II prospective runs, the TIME scenarios were run using a 12-hour response curve at evacuation level E. **Table 21** lists additional parameter inputs for each run.

Table 21 TIME Input Parameters – Phase II Prospective Runs

ADDITIONAL SCENARIO INPUT PARAMETERS	
Region	South Florida
Behavioral Assumption	Planning Assumptions
Network Period	2020
Population Period	2020
Model	Run Full Model
University Population	Out of Session (0% in residence)
Shelter Status	Primary Open
Tourist Included	No

6.3 Summary Tables for Test and Prospective Runs

The results for each future allocations scenario described in Table 10 and detailed in Sections 6.1 and 6.2 are summarized in the following tables. **Table 22** shows the results for the scenario clearance times. For the purposes of this study, scenario clearance times are defined as the time it takes from when an evacuation begins to when the last evacuee reaches Florida City. Florida City was chosen as it is the southernmost terminus of the Florida Turnpike. The additional roadway capacities provided by the Turnpike makes it so that evacuees can expect to encounter no further congestion as they continue their journey. This clearance time is measured by taking the out-of-county clearance time for the Upper Keys and adding 0.5 hours to represent the time required to reach the Florida Turnpike.

Table 23 displays the results for the total evacuating household (HH) population; this total includes site-built, mobile home (when applicable), and tourist (when applicable) populations. **Table 24** provides the results for the total number of evacuating vehicles; this total includes site-built, mobile home (when applicable), and tourist (when applicable) evacuating vehicles.

In addition to the summary tables for the test and prospective run scenarios, **Appendix D** provides the corresponding graphs and maps.

Table 22 Scenario Clearance Times

CLEARANCE TIMES (in hours)			Phases	Florida Keys Including Key West		Florida Keys Excluding Key West	
				Mobile Homes in Phase II (hours)	Mobile Homes in Phase I (hours)	Mobile Homes in Phase II (hours)	Mobile Homes in Phase I (hours)
Baseline Modeling							
Baseline Modeling		Shows baseline - does not include additional prospective allocations	Phase II	26.0	24.0	15.5	15.5
			Phase I	15.5	15.5	15.0	15.0
Prospective Modeling to Inform Future Policy Considerations							
S1	3,550 Allocations	Distribute based on county/municipality population size	Phase II	27.5	25.5	15.5	15.5
			Phase I	15.5	15.5	15.0	15.0
S2	3,550 Allocations	Distribute based percentage of vacant lands per county/municipality	Phase II	28.0	26.0	15.5	15.5
			Phase I	15.5	15.5	15.0	15.0
S3	3,550 Allocations	Distribute based on current allocations: (1,970-Monroe, 300-Marathon, 280-Islamorada, 910-Key West, 30-Layton, 60-Key Colony Beach)	Phase II	28.0	26.0	15.5	15.5
			Phase I	15.5	15.5	15.0	15.0
S4A	Minimal Allocations (11 allocations per year)	Distributes Monroe County (5); Marathon (2); Islamorada (2); Key West (2 – affordable only)	Phase II (10 Years of Growth)	26.5	24.0	15.5	15.5
S4B			Phase II (20 Years of Growth)	26.5	24.0	15.5	15.5
S4			Phase I	15.5	15.5	15.0	15.0
S5	One Unit per Vacant Lot	Distributes 7,954 units	Phase II	31.0	28.5	17.0	16.5
			Phase I	15.5	15.5	15.0	15.0

Table 23 Total Evacuating HH Population

TOTAL EVACUATING HOUSEHOLD POPULATION (Key West, Lower Keys, Middle Keys, Upper Keys)			PHASES	FLORIDA KEYS Including Key West		FLORIDA Excluding Key West	
				Mobile Homes in Phase II	Mobile Homes in Phase I	Mobile Homes in Phase II	Mobile Homes in Phase I
Baseline Modeling							
Baseline Modeling		Shows baseline - does not include additional prospective allocations	Phase II	68,165	60,464	41,575	36,666
			Phase I	24,485	33,066	13,927	19,325
Prospective Modeling to Inform Future Policy Considerations							
S1	3,550 Allocations	Distribute based on county/municipality population size	Phase II	73,162	65,229	44,285	39,233
			Phase I	24,485	33,066	13,927	19,325
S2	3,550 Allocations	Distribute based percentage of vacant lands per county/municipality	Phase II	73,297	65,365	44,873	39,822
			Phase I	24,485	33,066	13,927	19,325
S3	3,550 Allocations	Distribute based on current allocations: (1,970-Monroe, 300-Marathon, 280-Islamorada, 910-Key West, 30-Layton, 60-Key Colony Beach)	Phase II	73,431	65,498	44,101	39,049
			Phase I	24,485	33,066	13,927	19,325
S4A	Minimal Allocations (11 allocations per year)	Distributes Monroe County (5); Marathon (2); Islamorada (2); Key West (2 – affordable only)	Phase II (10 Years of Growth)	68,544	60,612	41,800	36,749
S4B			Phase II (20 Years of Growth)	68,689	60,757	41,885	36,834
S4			Phase I	24,485	33,066	13,927	19,325
S5	One Unit per Vacant Lot	Distributes 7,954 units	Phase II	79,375	71,442	48,789	43,737
			Phase I	24,485	33,066	13,927	19,325

Table 24 Total Evacuating Vehicles

TOTAL EVACUATING VEHICLES (Key West, Lower Keys, Middle Keys, Upper Keys)			Phases	Florida Keys Including Key West		Florida Keys Excluding Key West	
				Mobile Homes in Phase II	Mobile Homes in Phase I	Mobile Homes in Phase II	Mobile Homes in Phase I
Baseline Modeling							
Baseline Modeling		Shows baseline - does not include additional prospective allocations	Phase II	34,456	30,460	20,819	17,919
			Phase I	12,896	17,305	6,934	10,113
Prospective Modeling to Inform Future Policy Considerations							
S1	3,550 Allocations	Distribute based on county/municipality population size	Phase II	36,876	32,765	22,164	19,176
			Phase I	12,896	17,305	6,934	10,113
S2	3,550 Allocations	Distribute based percentage of vacant lands per county/municipality	Phase II	37,214	33,101	22,612	19,623
			Phase I	12,896	17,305	6,934	10,113
S3	3,550 Allocations	Distribute based on current allocations: (1,970-Monroe, 300-Marathon, 280-Islamorada, 910-Key West, 30-Layton, 60-Key Colony Beach)	Phase II	37,208	33,096	22,189	19,201
			Phase I	12,896	17,305	6,934	10,113
S4A	Minimal Allocations (11 allocations per year)	Distributes Monroe County (5); Marathon (2); Islamorada (2); Key West (2 – affordable only)	Phase II (10 Years of Growth)	34,646	30,536	20,948	17,961
S4B			Phase II (20 Years of Growth)	34,721	30,609	20,992	18,004
S4			Phase I	12,896	17,305	6,934	10,113
S5	One Unit per Vacant Lot	Distributes 7,954 units	Phase II	40,489	36,377	24,726	21,738
			Phase I	12,896	17,305	6,934	10,113

APPENDIX A – EARLY OUT UNIT ALLOCATION DISTRIBUTION

Table 25 Early Out Distribution Percentage and Allocation Distribution

AREA	TEZ	POPULATION SIZE	PROPORTIONS	ALLOCATION	SUBTOTALS	
COUNTY 68 (KEY WEST) 15,725 Total Population Size	1208	1,965	0.125	38*		
	1209	2,460	0.156	47		
	1210	1,450	0.092	28		
	1211	3,293	0.209	63		
	1212	664	0.042	13		
	1213	859	0.055	16		
	1214	538	0.034	10		
	1215	1,835	0.117	35		
	1216	842	0.054	16		
	1217	1,261	0.080	24		
	1218	279	0.018	5		
	1219	279	0.018	5	**300**	**Subtotal**
COUNTY 69 (LOWER KEYS) 8,425 Total Population Size	1220	1,184	0.141	14		
	1221	1,187	0.141	14		
	1222	1,262	0.150	15		
	1223	1,836	0.218	22		
	1224	2,442	0.290	29		
	1225	514	0.061	6	**100**	**Subtotal**
COUNTY 70 (MIDDLE KEYS) 8,912 Total Population Size	1226	246	0.028	11		
	1227	2,270	0.255	102		
	1228	3,710	0.416	166*		
	1229	1,032	0.116	46		
	1230	546	0.061	25		
	1231	1,108	0.124	50	**400**	**Subtotal**
COUNTY 71 (UPPER KEYS) 14,853 Total Population Size	1232	651	0.044	18		
	1233	210	0.014	6		
	1234	1,722	0.116	46		
	1235	1,494	0.101	40		
	1236	664	0.045	18		
	1237	1,112	0.075	30		
	1238	503	0.034	14		
	1239	483	0.033	13		
	1240	2,783	0.187	75		
	1241	1,249	0.084	34		
	1242	615	0.041	17		
	1243	1,599	0.108	43		
	1244	884	0.060	23*		
	1245	884	0.060	23*	**400**	**Subtotal**
	TOTAL ALLOCATIONS			**1200**		

*Due to rounding, these counts were adjusted to ensure subtotals match and to ensure a total of 1,200 allocations.

APPENDIX B – NETWORK LINK MODIFICATIONS

Table 26 Network Link Modifications

Road Name	A-NODE	B-NODE	MSEG (Ex. 6 Table)	DISCREPANCIES	
				Model:	Changed to:
Card Sound Road	514486	537267	31	MSEG = 29 MMKEYCAP = 0 MMKEYLN = 0	MSEG = 31 MMKEYCAP = 1100 MMKRYLN = 1
	537267	514799			
	514799	515004			
	515004	538482			
	538482	516495			
	516495	516523			
	516523	517248			
County Hwy 905	517046	517248	29	MMKEYCAP = 0 MMKEYLN = 0	MMKEYCAP = 1100 MMKRYLN = 1
	515654	517046			
US 1	514486	514490	27	FTYPE = 30 MMKEYCAP = 1500	FTYPE = 20 MMKEYCAP = 1200
US 1	514490	514545		MMKEYCAP = 1500	MMKEYCAP = 1200
	514545	514564			
	514564	514665			
	514665	514699			
	514699	514769			
	514769	537232		MMKEYCAP = 1500 MMKEYLN = 2	MMKEYCAP = 1200 MMKEYLN = 1
	537232	515199			
	515199	515654			
US 1	515500	515654	26	MMKEYLN = 3 ATYPE_20 = 52	MMKEYLN = 2 ATYPE_20 = 40
US 1	515500	515288	25		
	515288	515127			
	515127	515086			
	515086	515033			
	515033	515010			
	515010	536904			
	536904	514716			
US 1 (SB one way)	514689	514695	24		
	535879	514689			
	514529	535879			
	514499	514529			
US 1 (NB one way)	514693	514695			
	514692	514693			
	535880	514692			
	514499	535880			
US 1	514491	514499			
	514478	514491			
	514420	539235			
	539235	514371			
US 1 (SB one way)	514371	514363			
	514363	514359			

Road Name	A-NODE	B-NODE	MSEG (Ex. 6 Table)	DISCREPANCIES	
				Model:	Changed to:
US 1 (NB one way)	514367	514371			
	514371	514366			
	514366	514364			
	514364	514359			
US 1	514359	514357			
	514357	514312			
	514312	514307			
US 1	514307	536905	23	MMKEYCAP = 1350 MMKEYLN = 2 FTYPE-20 = 30 ATYPE_20 = 52	MMKEYCAP = 1100 MMKEYLN = 1 FTYPE-20 = 20 ATYPE_20 = 40
	536905	514258			
	514258	514238			
US 1	514167	514238	22	MMKEYCAP = 1350 MMKEYLN = 2 ATYPE_20 = 52	MMKEYCAP = 1100 MMKEYLN = 1 ATYPE_20 = 40
	539234	514167			
US 1	513848	539234	21		
US 1	513818	513848	20		
	513367	513530			
	513364	513367			
	513530	513818	20	MMKEYCAP = 1350 MMKEYLN = 2	MMKEYCAP = 1100 MMKEYLN = 1
US 1	513333	513364	19		
	512951	513333			
	512930	512951			
	512460	512930			
	512367	512460			
	512361	512367			
	512350	512361			
	512294	512350			
	512225	512294			
US 1	512120	512225	18		
	511978	512120			
US 1	511644	511567	15	FTYPE_20 = 30 ATYPE_20 = 51	FTYPE_20 = 20 ATYPE_20 = 30
	511567	511463			
US 1	511463	511364	14	FTYPE_20 = 30 ATYPE_20 = 51	FTYPE_20 = 20 ATYPE_20 = 30
	511364	511278		ATYPE_20 = 51	ATYPE_20 = 30
	511278	511270			
US 1	511264	511256		ATYPE_20 = 51 MSEG = 13 FLKEYCAP = 1100 MMKEYCAP = 1350	ATYPE_20 = 30 MSEG = 14 FLKEYCAP = 900 MMKEYCAP = 900

Road Name	A-NODE	B-NODE	MSEG (Ex. 6 Table)	DISCREPANCIES	
				Model:	Changed to:
US 1	511256	511157	13	ATYPE_20 = 51 MMKEYCAP = 1350 MMKEYLN = 2	ATYPE_20 = 30 MMKEYCAP = 1100 MMKEYLN = 1
US 1	511157	510424	12	MMKEYCAP = 1350	MMKEYCAP = 1200
	510424	509895		MMKEYCAP = 1500	MMKEYCAP = 1200
US 1	509895	509271	10	MMKEYCAP = 1350	MMKEYCAP = 1100
US 1	509271	508773	8	MMKEYLN = 2	MMKEYLN = 1
	508773	508699		FTYPE_20 = 30 MMKEYLN = 2	FTYPE_20 = 20 MMKEYLN = 1
	508699	508450		ATYPE_20 = 52 MMKEYLN = 2	ATYPE_20 = 30 MMKEYLN = 1
	508450	508234		ATYPE_20 = 52 FTYPE_20 = 30 MMKEYLN = 2	ATYPE_20 = 30 FTYPE_20 = 20 MMKEYLN = 1
	508234	508201			
US 1	508201	507712	7	ATYPE_20 = 52 FTYPE_20 = 30 MMKEYCAP = 1350	ATYPE_20 = 30 FTYPE_20 = 20 MMKEYCAP = 1100
	507712	507331		MMKEYCAP = 1350	MMKEYCAP = 1100
	507331	507098			
	507098	506898		ATYPE_20 = 52 MMKEYCAP = 1350	ATYPE_20 = 30 MMKEYCAP = 1100
	506898	506331		MMKEYCAP = 1350	MMKEYCAP = 1100
	506331	506322		FTYPE_20 = 30 MMKEYCAP = 1350	FTYPE_20 = 20 MMKEYCAP = 1100
US 1	506322	506027	6	ATYPE_20 = 52 FTYPE_20 = 30 MMKEYCAP = 1350	ATYPE_20 = 30 FTYPE_20 = 20 MMKEYCAP = 1100
US 1	506027	505762	5	MMKEYCAP = 1350	MMKEYCAP = 1100
	505762	505669		FTYPE_20 = 30 MMKEYCAP = 1350	FTYPE_20 = 20 MMKEYCAP = 1100
	505669	505243		ATYPE_20 = 52 FTYPE_20 = 30 MMKEYCAP = 1350	ATYPE_20 = 40 FTYPE_20 = 20 MMKEYCAP = 1100
	505243	505223		ATYPE_20 = 52 MMKEYCAP = 1350	ATYPE_20 = 40 MMKEYCAP = 1100
US 1	505223	505119	4	ATYPE_20 = 52 FTYPE_20 = 30 MMKEYCAP = 1350	ATYPE_20 = 40 FTYPE_20 = 20 MMKEYCAP = 1100

Road Name	A-NODE	B-NODE	MSEG (Ex. 6 Table)	DISCREPANCIES	
				Model:	Changed to:
	505119	505063		ATYPE_20 = 52 FTYPE_20 = 30 MMKEYCAP = 1350	ATYPE_20 = 30 FTYPE_20 = 20 MMKEYCAP = 1100
	505063	504878		MMKEYCAP = 1350	MMKEYCAP = 1100
	504878	504610		ATYPE_20 = 52 MMKEYCAP = 1350	ATYPE_20 = 40 MMKEYCAP = 1100
	504610	503962		MMKEYCAP = 1350	MMKEYCAP = 1100
US 1	503962	503879	3	ATYPE_20 = 52 FTYPE_20 = 30 MMKEYCAP = 1350	ATYPE_20 = 30 FTYPE_20 = 20 MMKEYCAP = 1100
	503879	503465		MMKEYCAP = 1350	MMKEYCAP = 1100
	503465	503329			
	503329	501848			
	501848	501501		ATYPE_20 = 52 FTYPE_20 = 30 MMKEYCAP = 1350	ATYPE_20 = 30 FTYPE_20 = 20 MMKEYCAP = 1100
US 1 (←)	501285	501222	2	MMKEYLN = 0 MSEG = 0 FLKEYCAP = 0 MMKEYCAP = 0	MMKEYLN = 2 MSEG = 2 FLKEYCAP = 900 MMKEYCAP = 900
US 1 (←)	501146	501222		MMKEYLN = 0 MSEG = 0 FLKEYCAP = 0 MMKEYCAP = 0 FTYPE_20 = 20	MMKEYLN = 1 MSEG = 2 FLKEYCAP = 900 MMKEYCAP = 900 FTYPE_20 = 30
US 1 (→)	501222	501245		MMKEYLN = 0 MSEG = 0 FLKEYCAP = 0 MMKEYCAP = 0 FTYPE_20 = 70	MMKEYLN = 1 MSEG = 2 FLKEYCAP = 900 MMKEYCAP = 900 FTYPE_20 = 20
	501245	501231			
US 1	501501	501285		ATYPE_20 = 52	ATYPE_20 = 30
	500258	500250		FTYPE_20 = 30	FTYPE_20 = 20
N. Roosevelt Blvd.	500250	536906	1	FTYPE_20 = 30	FTYPE_20 = 20
	536906	500094			
	500094	500075			
	500003	500064			
	499940	500003			
	499843	499940		MMKEYLN = 0 MSEG = 0 FLKEYCAP = 0 MMKEYCAP = 0 FTYPE_20 = 30	MMKEYLN = 2 MSEG = 1 FLKEYCAP = 900 MMKEYCAP = 900 FTYPE_20 = 20
	499825	499843			
	499824	499825		MMKEYLN = 0	MMKEYLN = 2

Road Name	A-NODE	B-NODE	MSEG (Ex. 6 Table)	DISCREPANCIES	
				Model:	Changed to:
	499824	499800		MSEG = 0 FLKEYCAP = 0 MMKEYCAP = 0	MSEG = 1 FLKEYCAP = 900 MMKEYCAP = 900
	499800	499745			
Truman Ave.	499745	499635		MMKEYLN = 0 MSEG = 0 FLKEYCAP = 0 MMKEYCAP = 0	MMKEYLN = 1 MSEG = 1 FLKEYCAP = 900 MMKEYCAP = 900
	499635	499613			
	499613	499588			
	499588	499508			
Truman Ave.	499508	499477		MMKEYLN = 0 MSEG = 0 FLKEYCAP = 0 MMKEYCAP = 0 ATYPE_20 = 13	MMKEYLN = 1 MSEG = 1 FLKEYCAP = 900 MMKEYCAP = 900 ATYPE_20 = 33
	499477	499466			
S. Roosevelt Blvd. (Hwy A1A)	536907	500250		MMKEYLN = 0 MSEG = 0 FLKEYCAP = 0 MMKEYCAP = 0	MMKEYLN = 2 MSEG = 1 FLKEYCAP = 900 MMKEYCAP = 900
	500262	536907			
	537987	500262		MMKEYLN = 0 MSEG = 0 FLKEYCAP = 0 MMKEYCAP = 0	MMKEYLN = 2 MSEG = 1 FLKEYCAP = 900 MMKEYCAP = 900
	537988	537987			
Bertha St.	499916	537988		MMKEYLN = 0 MSEG = 0 FLKEYCAP = 0 MMKEYCAP = 0 LANE_20 = 2	MMKEYLN = 1 MSEG = 1 FLKEYCAP = 900 MMKEYCAP = 900 LANE_20 = 1
Flagler Ave.	500247	500262		MMKEYLN = 0 MSEG = 0 FLKEYCAP = 0 MMKEYCAP = 0	MMKEYLN = 2 MSEG = 1 FLKEYCAP = 900 MMKEYCAP = 900
	500151	500247			
	500112	500151			
	500042	500112			
	500022	500042			
	500004	500022			
	499916	500004			
Flagler Ave.	499893	499916		MMKEYLN = 0 MSEG = 0 FLKEYCAP = 0 MMKEYCAP = 0 FTYPE_20 = 30	MMKEYLN = 1 MSEG = 1 FLKEYCAP = 900 MMKEYCAP = 900 FTYPE_20 = 20
	499888	499893			
Flagler Ave.	499746	499888		MMKEYLN = 0 MSEG = 0 FLKEYCAP = 0 MMKEYCAP = 0	MMKEYLN = 1 MSEG = 1 FLKEYCAP = 900 MMKEYCAP = 900
White St.	499711	499746		MMKEYLN = 0 MSEG = 0	MMKEYLN = 1 MSEG = 1

Road Name	A-NODE	B-NODE	MSEG (Ex. 6 Table)	DISCREPANCIES	
				Model:	Changed to:
	499635	499711		FLKEYCAP = 0 MMKEYCAP = 0 FTYPE_20 = 40	FLKEYCAP = 900 MMKEYCAP = 900 FTYPE_20 = 30

APPENDIX C – TEZ ALLOCATION DISTRIBUTION

Table 27 Allocation Distribution for Each TEZ – Scenario 1

AREA	TEZ	ADDED ALLOCATIONS TO HOUSEHOLDS	SUBTOTALS	
COUNTY 68 (KEY WEST)	1208	135		
	1209	162		
	1210	152		
	1211	299		
	1212	65		
	1213	79		
	1214	60		
	1215	143		
	1216	101		
	1217	143		
	1218	30		
	1219	29	**1,398**	**Subtotal**
COUNTY 69 (LOWER KEYS)	1220	122		
	1221	104		
	1222	75		
	1223	115		
	1224	176		
	1225	36	**628**	**Subtotal**
COUNTY 70 (MIDDLE KEYS)	1226	16		
	1227	165		
	1228	242		
	1229	56		
	1230	23		
	1231	46	**548**	**Subtotal**
COUNTY 71 (UPPER KEYS)	1232	35		
	1233	14		
	1234	123		
	1235	101		
	1236	43		
	1237	84		
	1238	35		
	1239	43		
	1240	150		
	1241	118		
	1242	38		
	1243	122		
	1244	35		
	1245	35	**976**	**Subtotal**
TOTAL ALLOCATIONS		**3,550**		

Table 28 Allocation Distribution for Each TEZ – Scenario 2

AREA	TEZ	ADDED ALLOCATIONS TO POPULATION	SUBTOTALS	
KEY WEST	1208	4		
	1209	4		
	1210	4		
	1211	4		
	1212	4		
	1213	4		
	1214	4		
	1215	4		
	1216	5	**37**	**Subtotal**
MONROE COUNTY	1217	302		
	1218	302		
	1219	302		
	1220	302		
	1221	302		
	1222	302		
	1223	302		
	1224	302		
	1225	302	**2,718**	**Subtotal**
MARATHON & KCB	1226	85		
	1227	85		
	1228	102		
	1229	86	**358**	**Subtotal**
ISLAMORADA & LAYTON	1230	76		
	1231	72		
	1232	72		
	1233	72		
	1234	72		
	1235	73	**437**	**Subtotal**
TOTAL ALLOCATIONS		**3,550**		

Table 29 Allocation Distribution for Each TEZ – Scenario 3

AREA	TEZ	ADDED ALLOCATIONS TO POPULATION	SUBTOTALS	
KEY WEST	1208	101		
	1209	101		
	1210	101		
	1211	101		
	1212	101		
	1213	101		
	1214	101		
	1215	101		
	1216	101	**909**	**Subtotal**
MONROE COUNTY	1217	219		
	1218	219		
	1219	219		
	1220	219		
	1221	219		
	1222	219		
	1223	219		
	1224	219		
	1225	218	**1,970**	**Subtotal**
MARATHON & KCB	1226	75		
	1227	75		
	1228	135		
	1229	75	**360**	**Subtotal**
ISLAMORADA & LAYTON	1230	77		
	1231	47		
	1232	47		
	1233	47		
	1234	47		
	1235	46	**311**	**Subtotal**
TOTAL ALLOCATIONS		**3,550**		

Table 30 Allocation Distribution for Each TEZ – Scenario 4A

AREA	TEZ	ADDED ALLOCATIONS TO POPULATION	SUBTOTALS	
KEY WEST	1208	2		
	1209	2		
	1210	2		
	1211	2		
	1212	2		
	1213	2		
	1214	2		
	1215	3		
	1216	3	**20**	**Subtotal**
MONROE COUNTY	1217	6		
	1218	6		
	1219	6		
	1220	6		
	1221	6		
	1222	5		
	1223	5		
	1224	5		
	1225	5	**50**	**Subtotal**
MARATHON	1226	5		
	1227	5		
	1228	5		
	1229	5	**20**	**Subtotal**
ISLAMORADA	1230	3		
	1231	3		
	1232	3		
	1233	3		
	1234	4		
	1235	4	**20**	**Subtotal**
TOTAL ALLOCATIONS		**110**		

Table 31 Allocation Distribution for Each TEZ – Scenario 4B

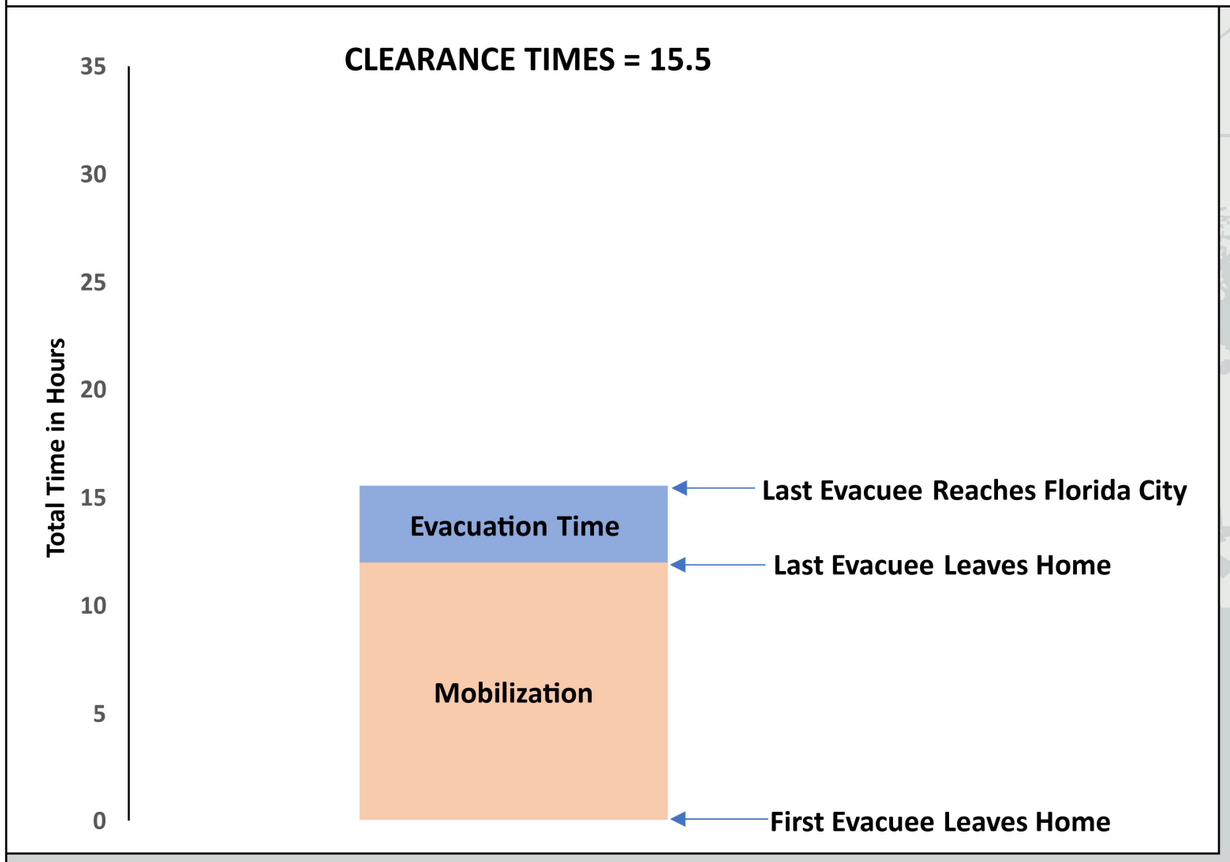
AREA	TEZ	ADDED ALLOCATIONS TO POPULATION	SUBTOTALS	
KEY WEST	1208	4		
	1209	4		
	1210	4		
	1211	4		
	1212	4		
	1213	5		
	1214	5		
	1215	5		
	1216	5	**40**	**Subtotal**
MONROE COUNTY	1217	11		
	1218	11		
	1219	11		
	1220	11		
	1221	11		
	1222	11		
	1223	11		
	1224	11		
	1225	12	**100**	**Subtotal**
MARATHON	1226	10		
	1227	10		
	1228	10		
	1229	10	**40**	**Subtotal**
ISLAMORADA	1230	7		
	1231	7		
	1232	7		
	1233	7		
	1234	6		
	1235	6	**40**	**Subtotal**
TOTAL ALLOCATIONS		**220**		

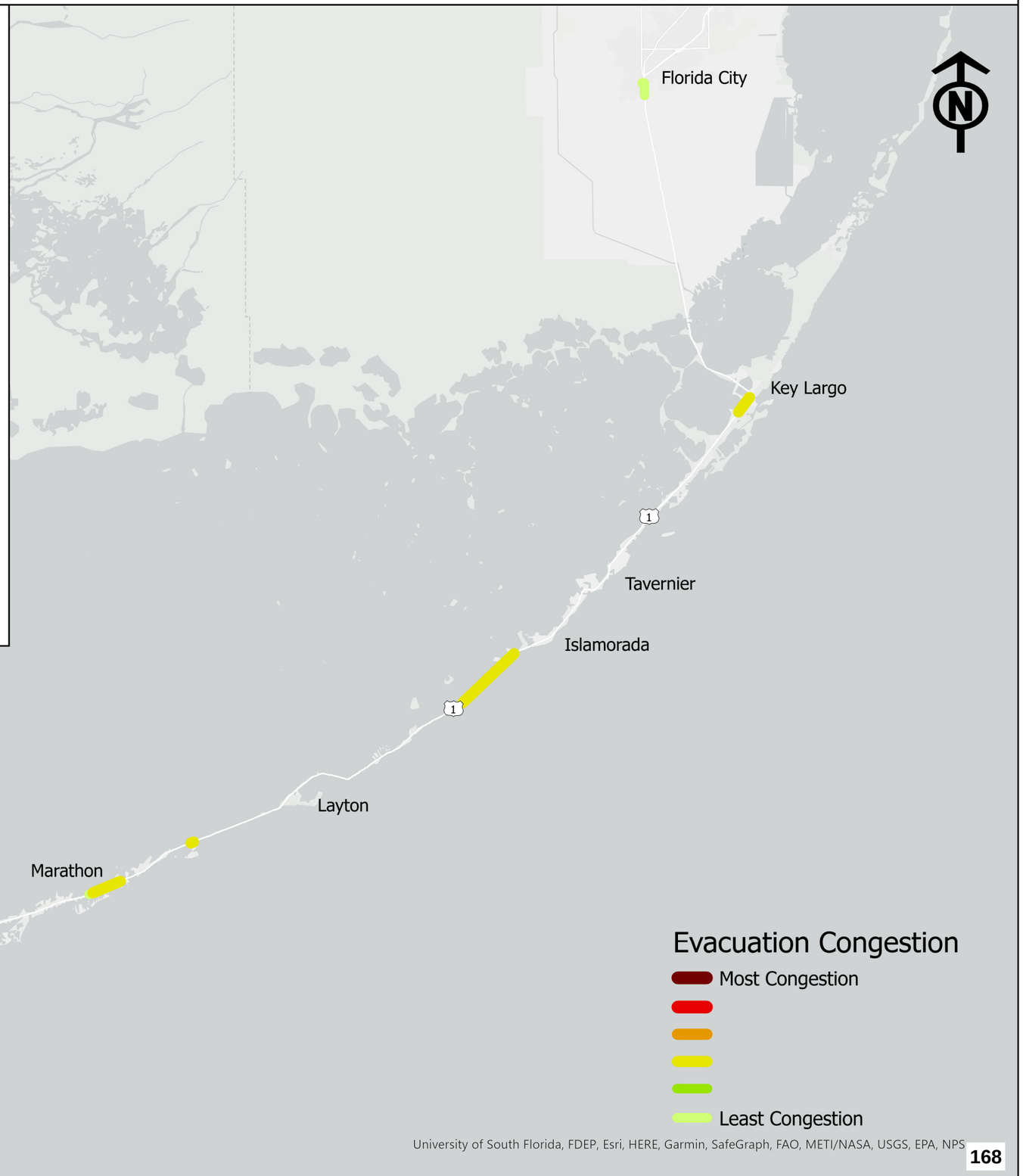
Table 32 Allocation Distribution for Each TEZ – Scenario 5

AREA	TEZ	ADDED ALLOCATIONS TO POPULATION	SUBTOTALS	
KEY WEST	1208	9		
	1209	9		
	1210	9		
	1211	9		
	1212	9		
	1213	9		
	1214	10		
	1215	10		
	1216	10	**84**	**Subtotal**
MONROE COUNTY	1217	676		
	1218	676		
	1219	676		
	1220	676		
	1221	676		
	1222	676		
	1223	676		
	1224	677		
	1225	677	**6,086**	**Subtotal**
MARATHON & KCB	1226	191		
	1227	191		
	1228	230		
	1229	191	**803**	**Subtotal**
ISLAMORADA & LAYTON	1230	172		
	1231	162		
	1232	162		
	1233	162		
	1234	162		
	1235	161	**981**	**Subtotal**
TOTAL ALLOCATIONS		**7,954**		

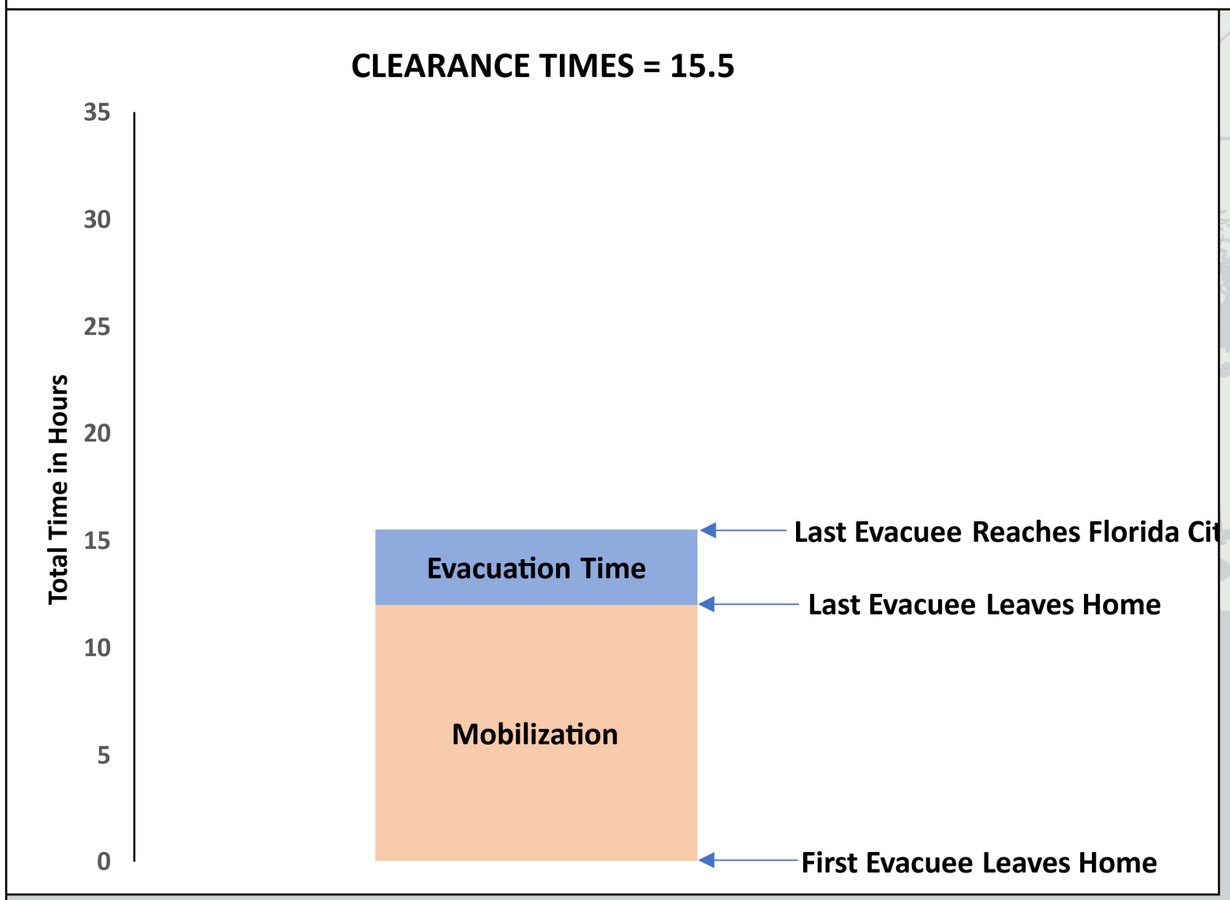
APPENDIX D – GRAPHS AND MAPS

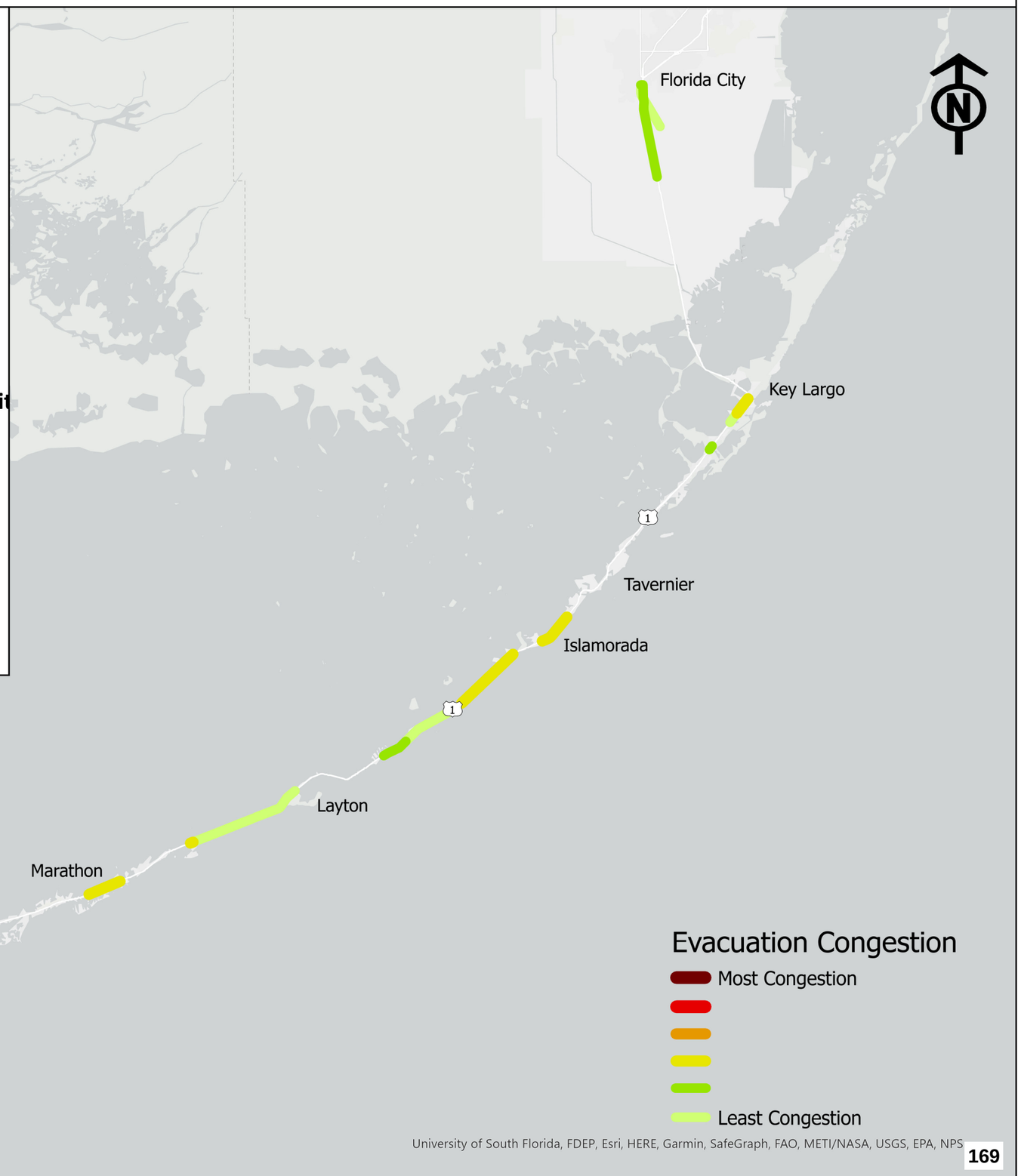
Scenario B1-A: No Allocation, Includes Key West and Excludes Mobile Homes - Phase I



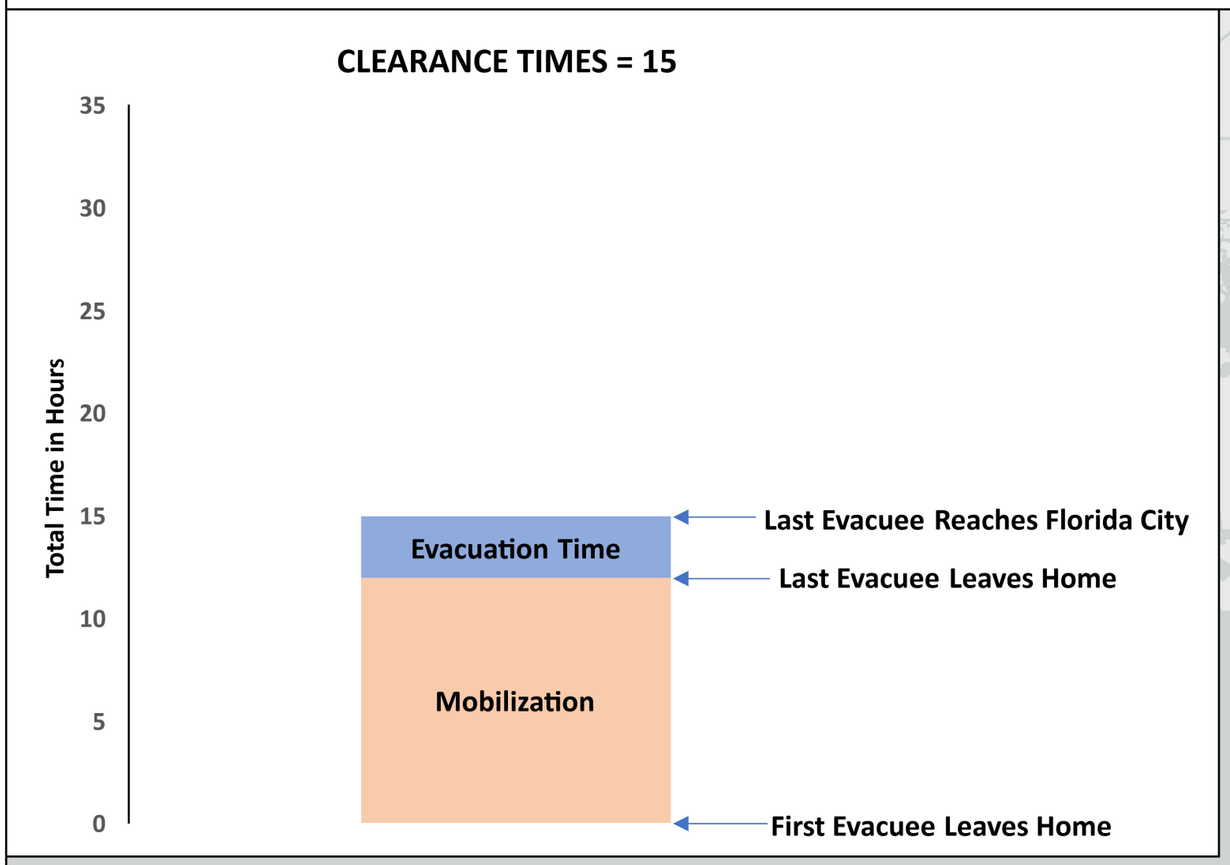


Scenario B1-B: No Allocation, Includes Key West and Mobile Homes - Phase I

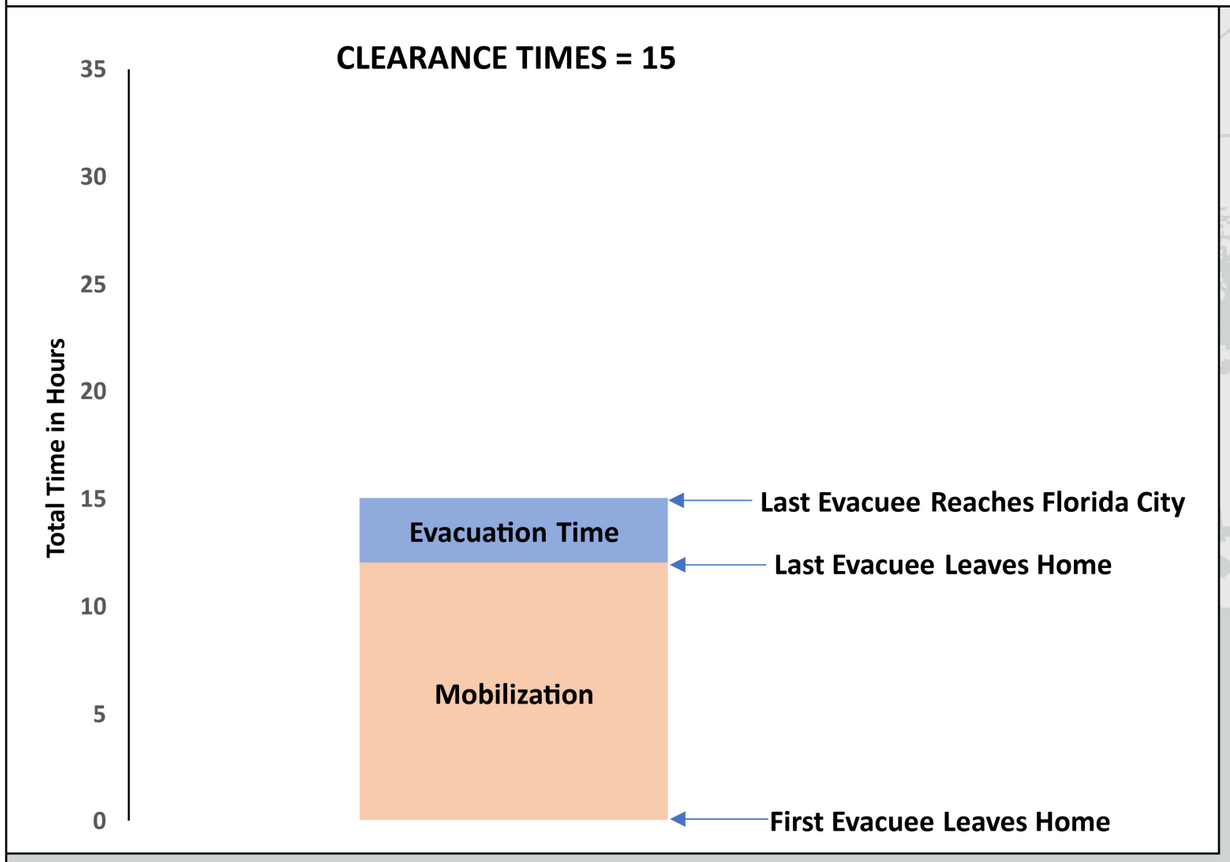


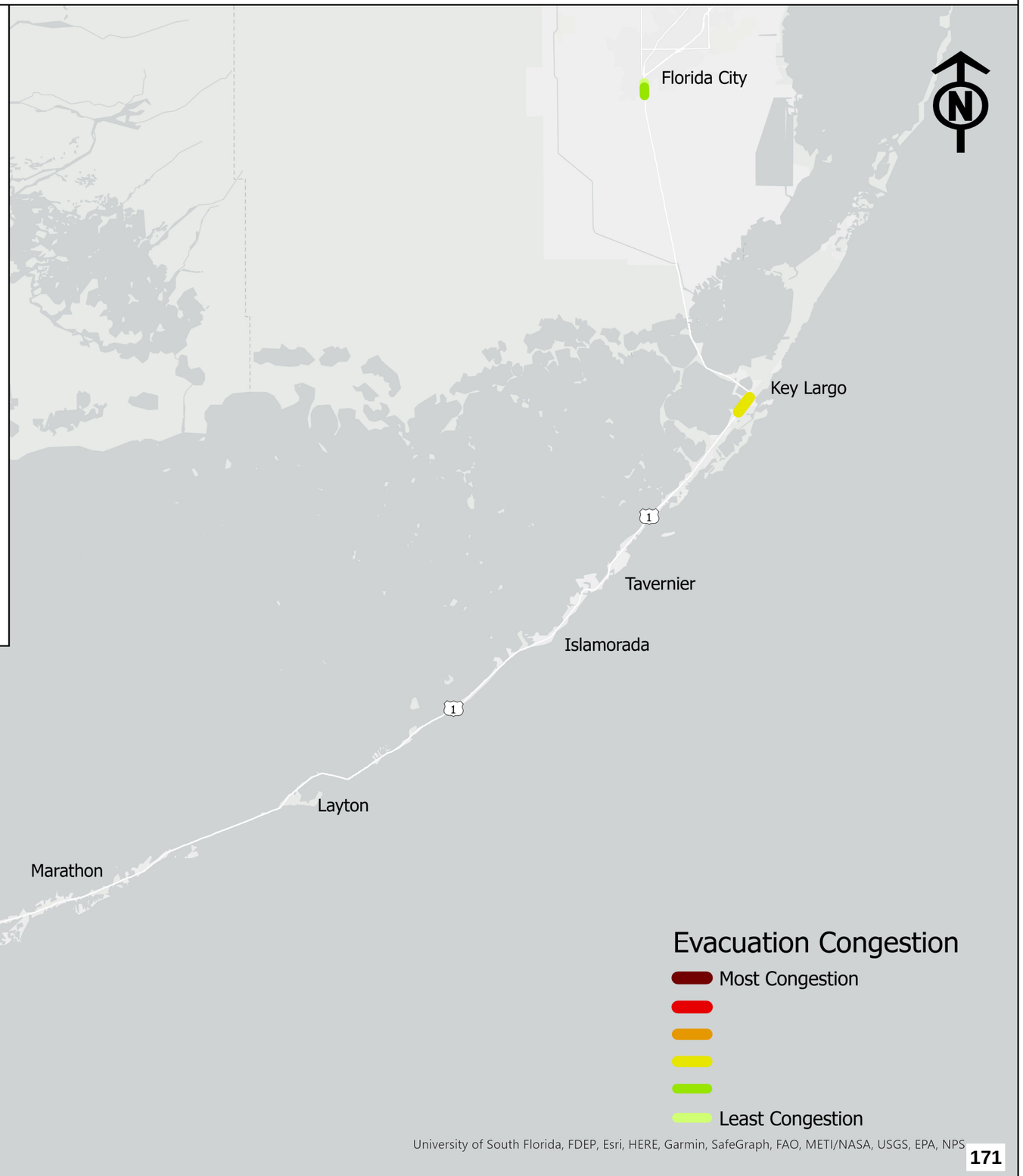


Scenario B1-C: No Allocation, Excludes Key West and Mobile Homes - Phase I

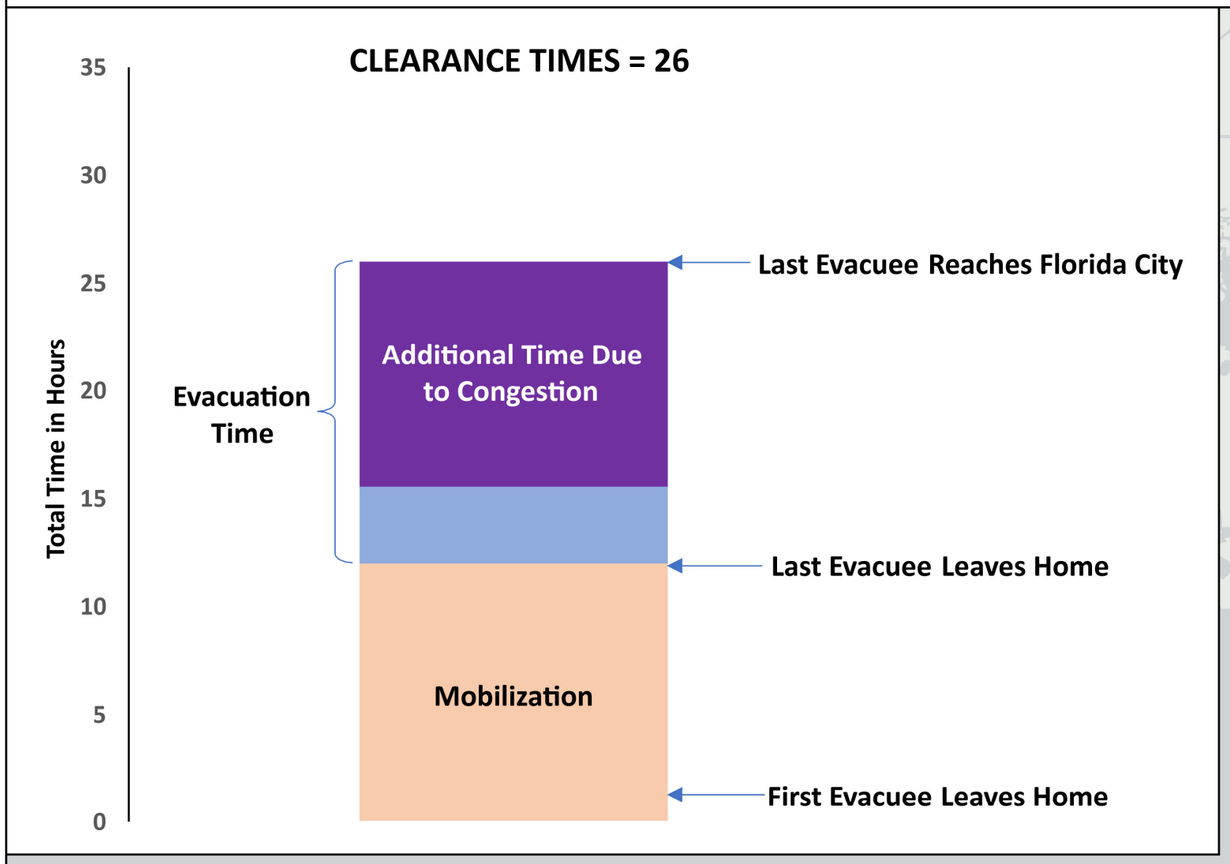


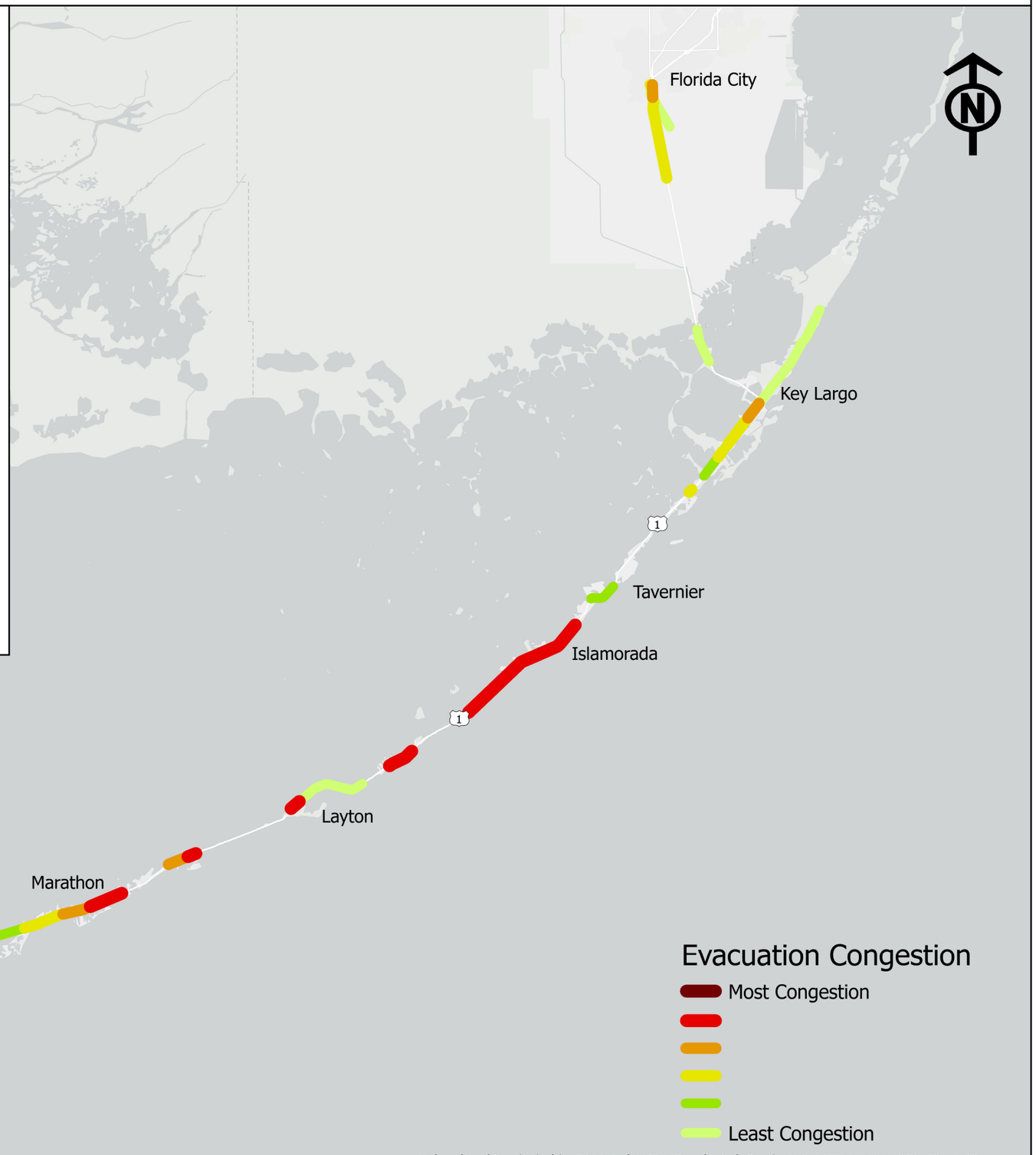
Scenario B1-D: No Allocation, Excludes Key West and Includes Mobile Homes - Phase I





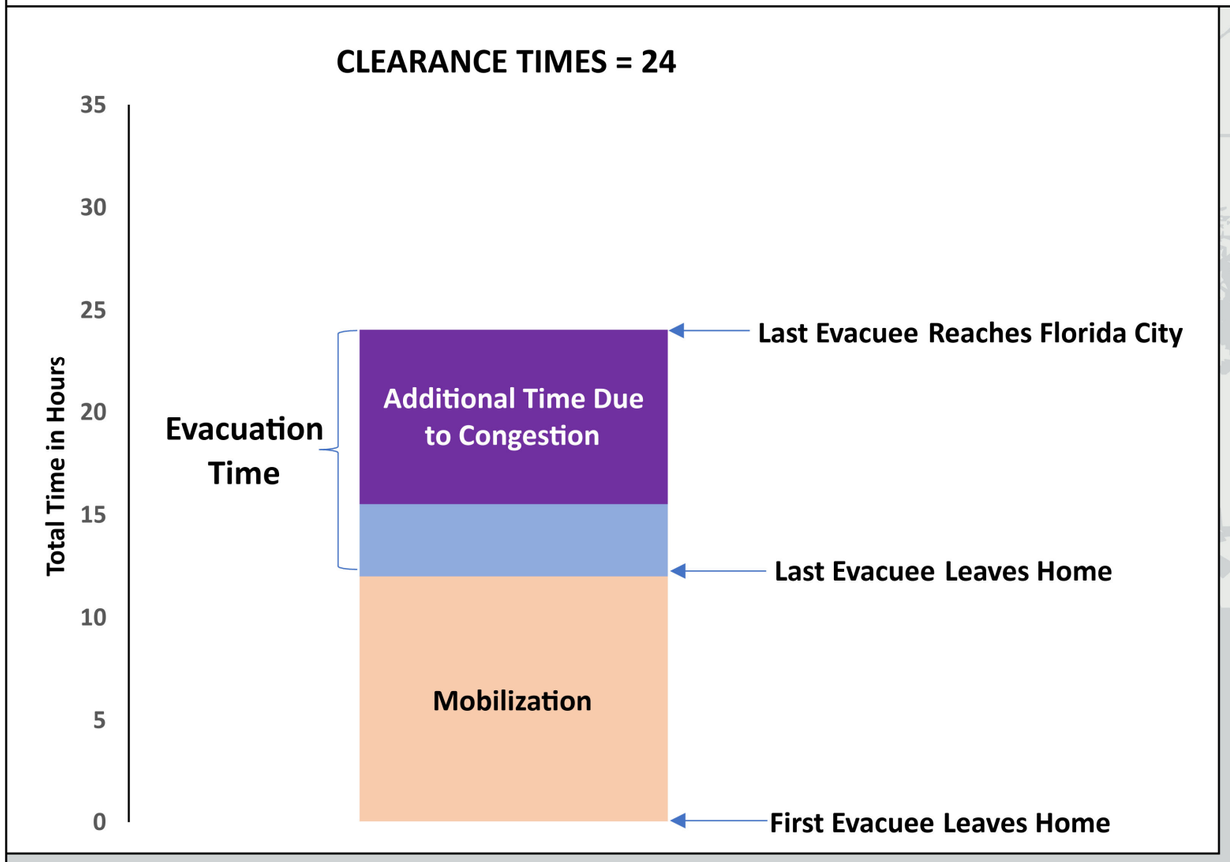
Scenario B2-A: No Allocation, Includes Key West and Mobile Homes - Phase II

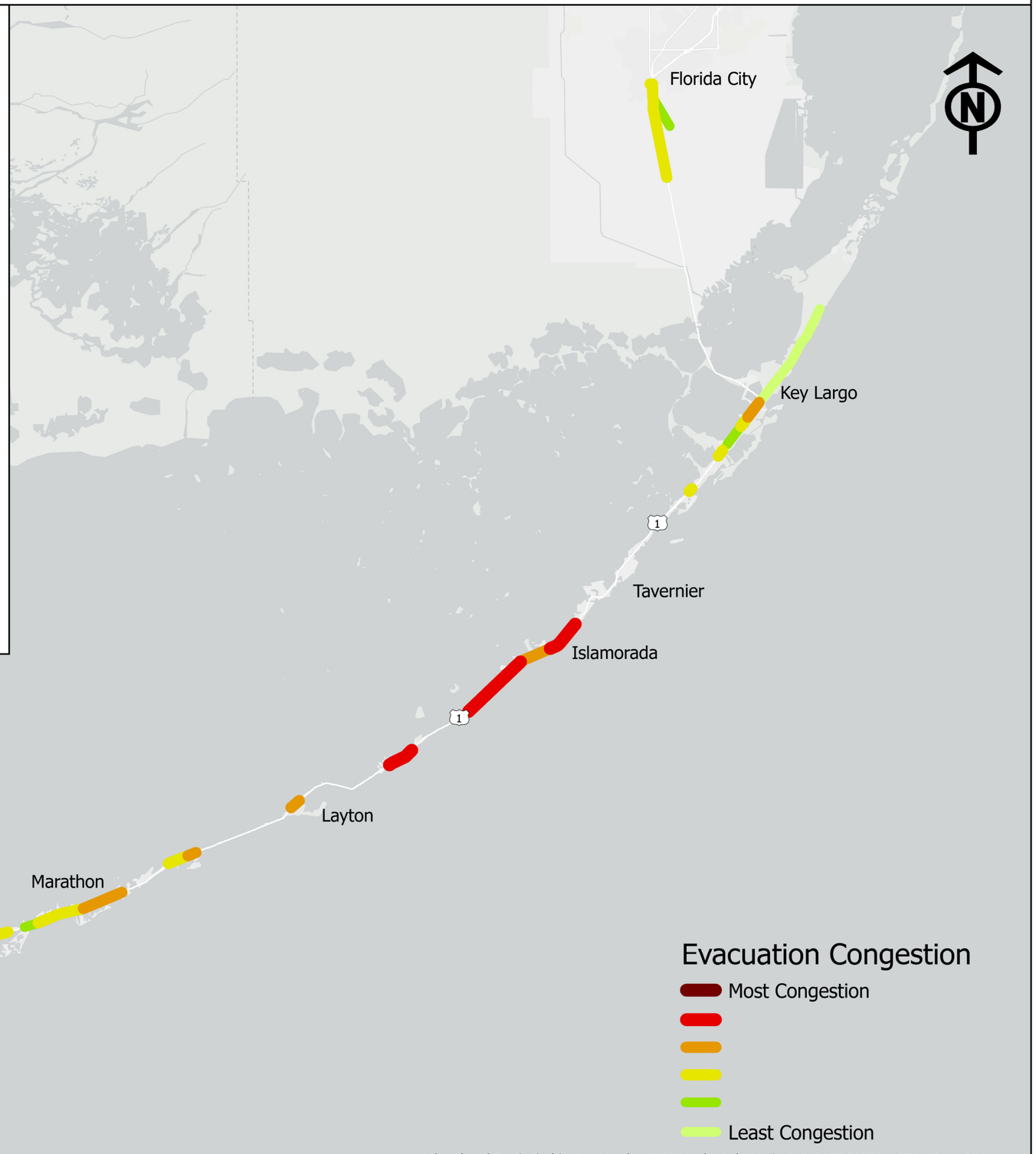




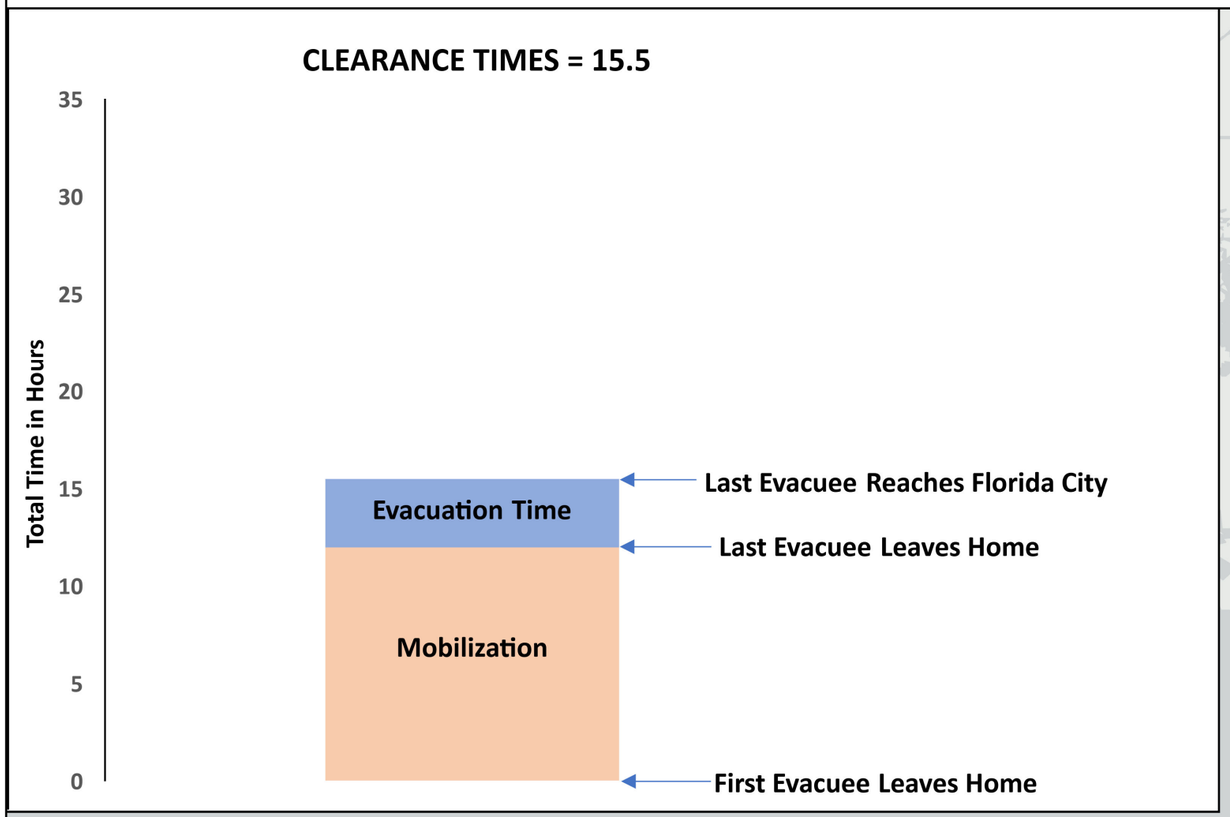
University of South Florida, FDEP, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS

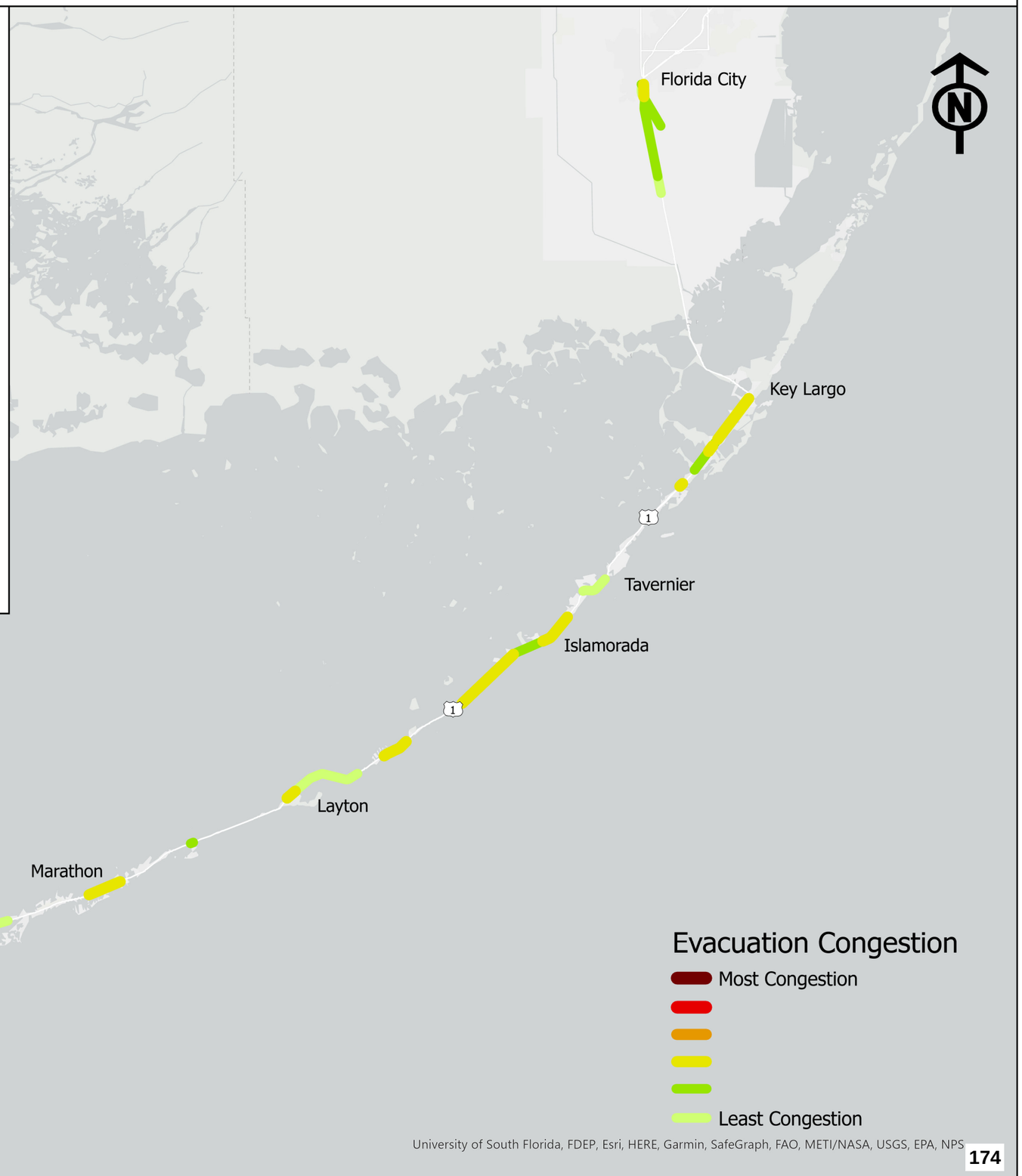
Scenario B2-B: No Allocation, Includes Key West and Excludes Mobile Homes - Phase II



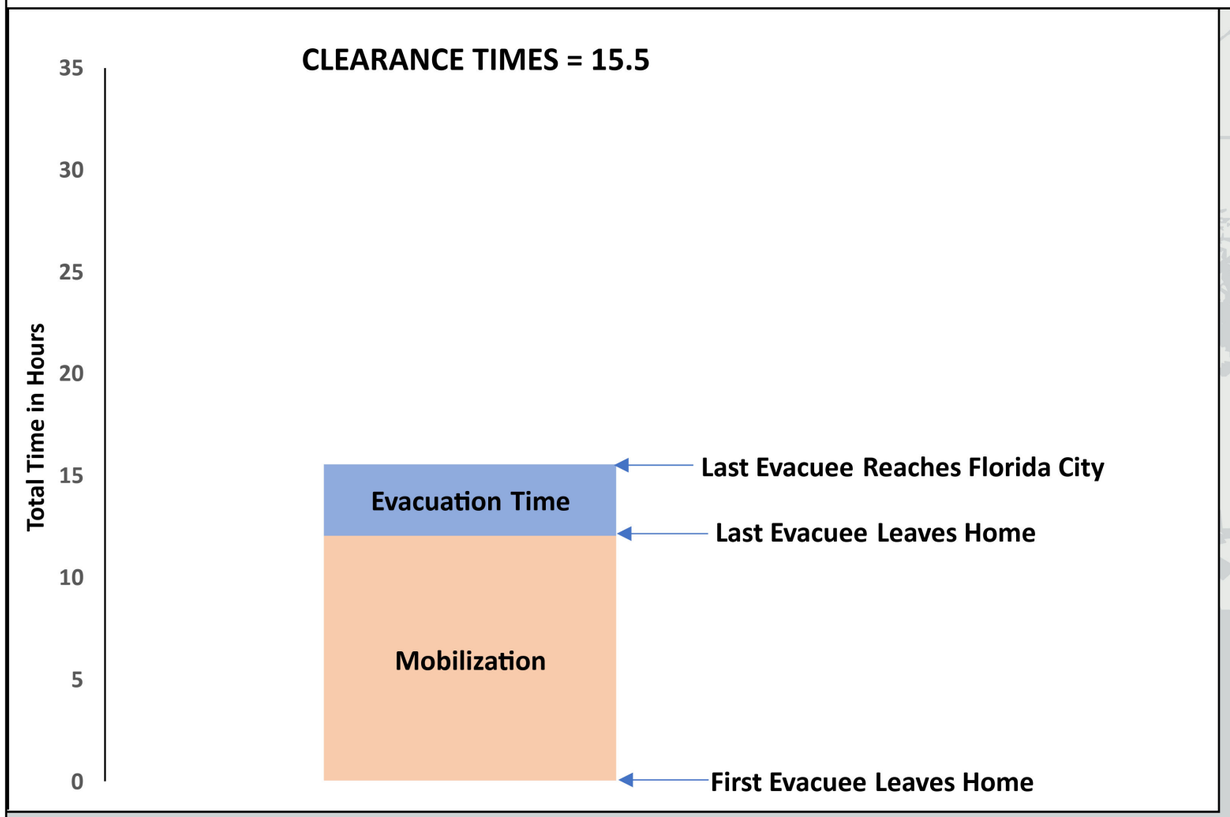


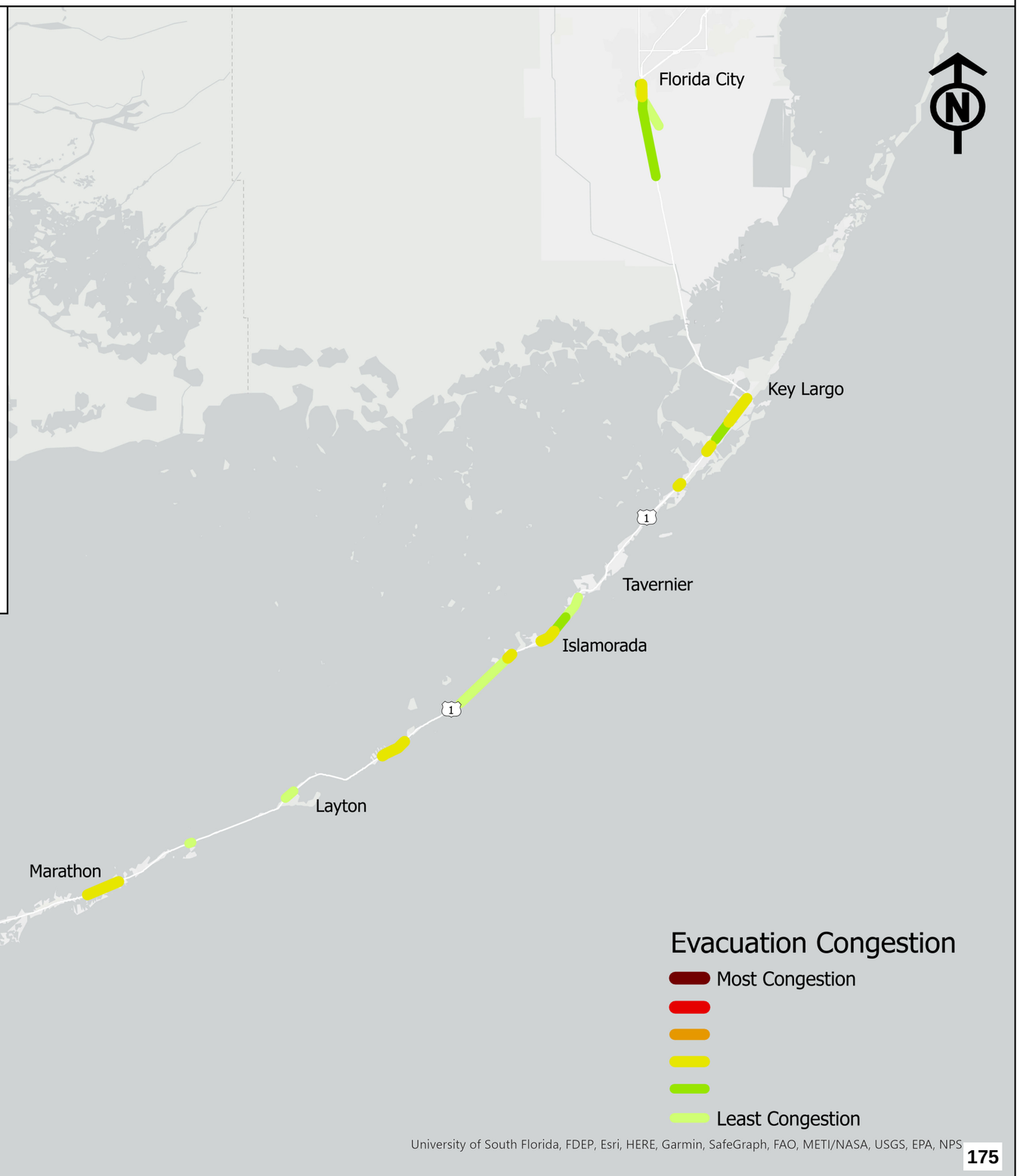
Scenario B2-C: No Allocation, Excludes Key West and Includes Mobile Homes - Phase II



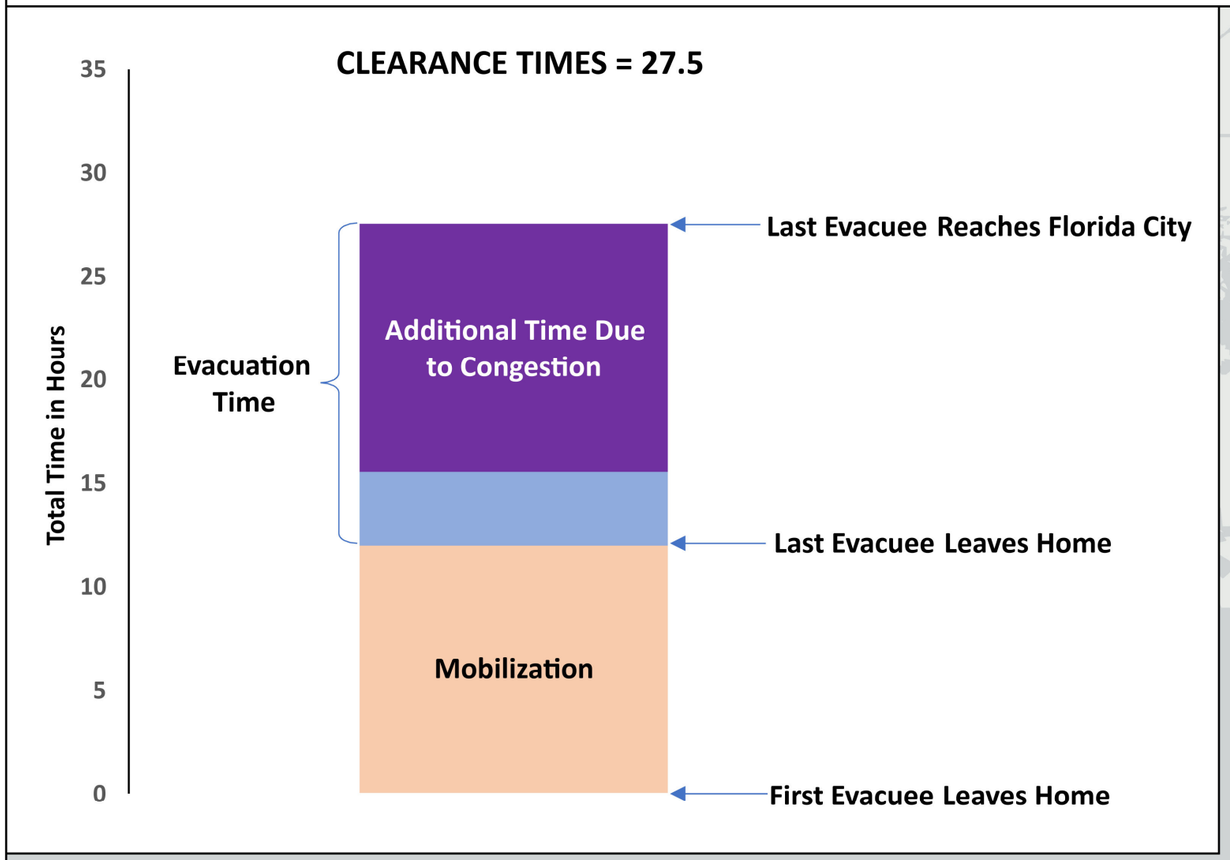


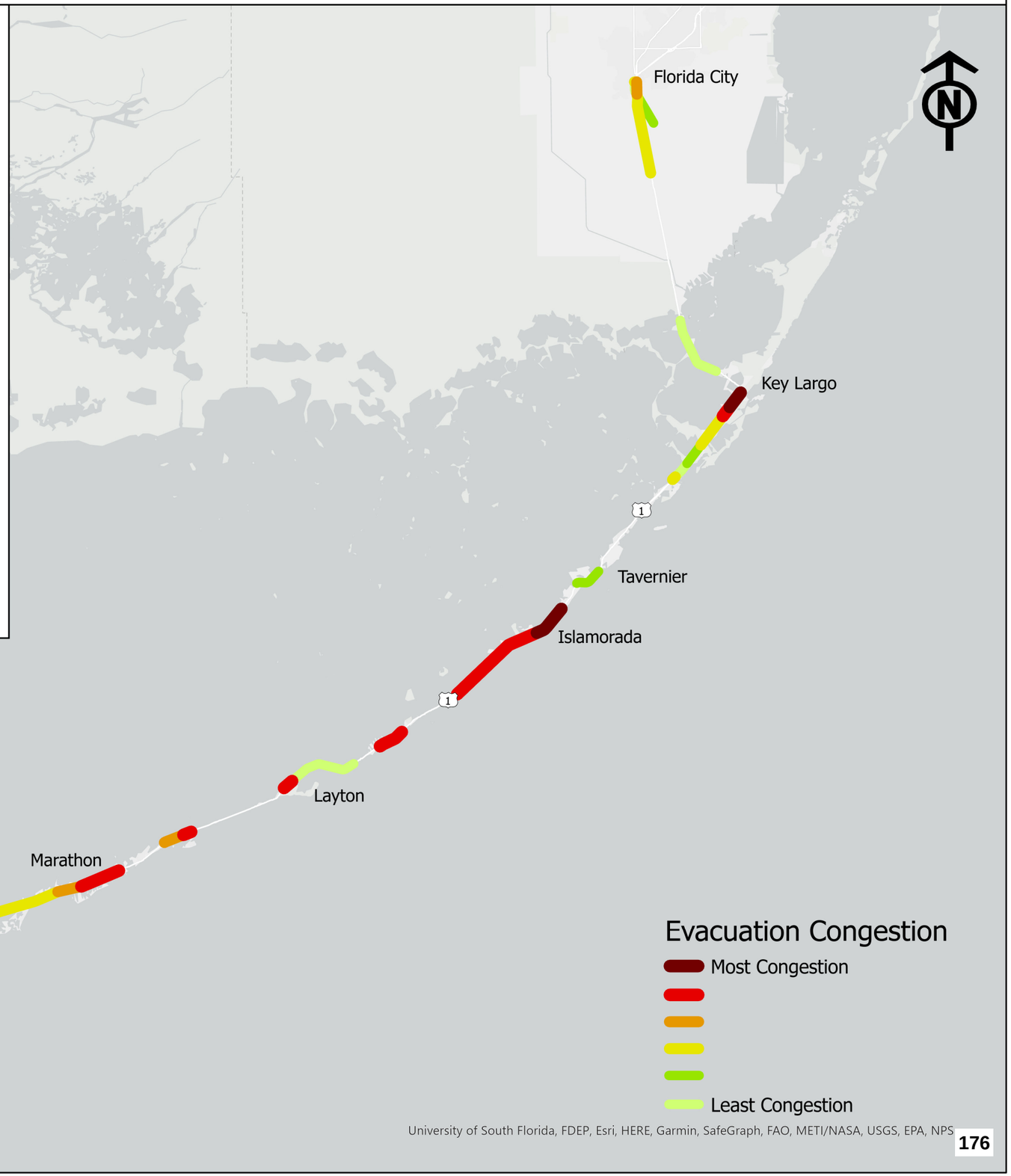
Scenario B2-D: No Allocation, Excludes Key West and Mobile Homes - Phase II





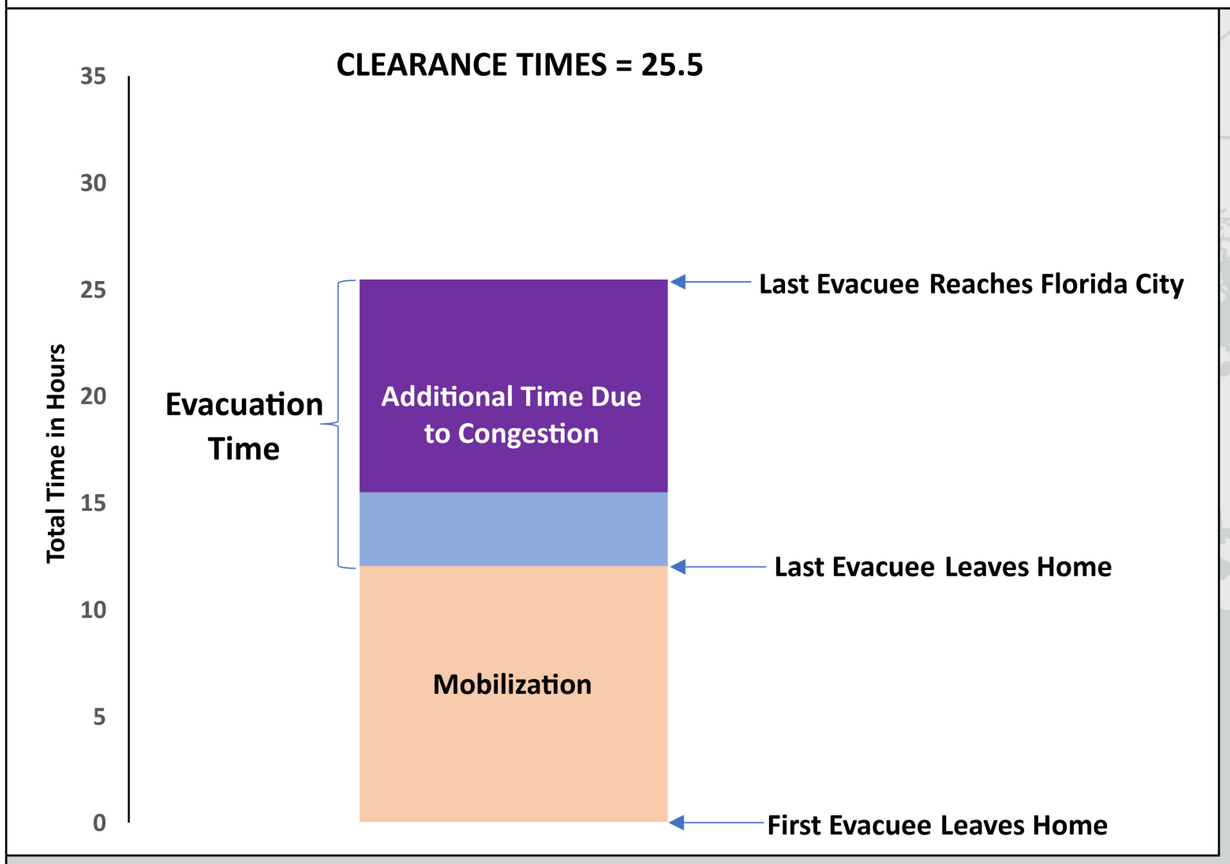
Scenario S1-A: Allocation of 3,550 Units Based on Population, Includes Key West and Mobile Homes - Phase II

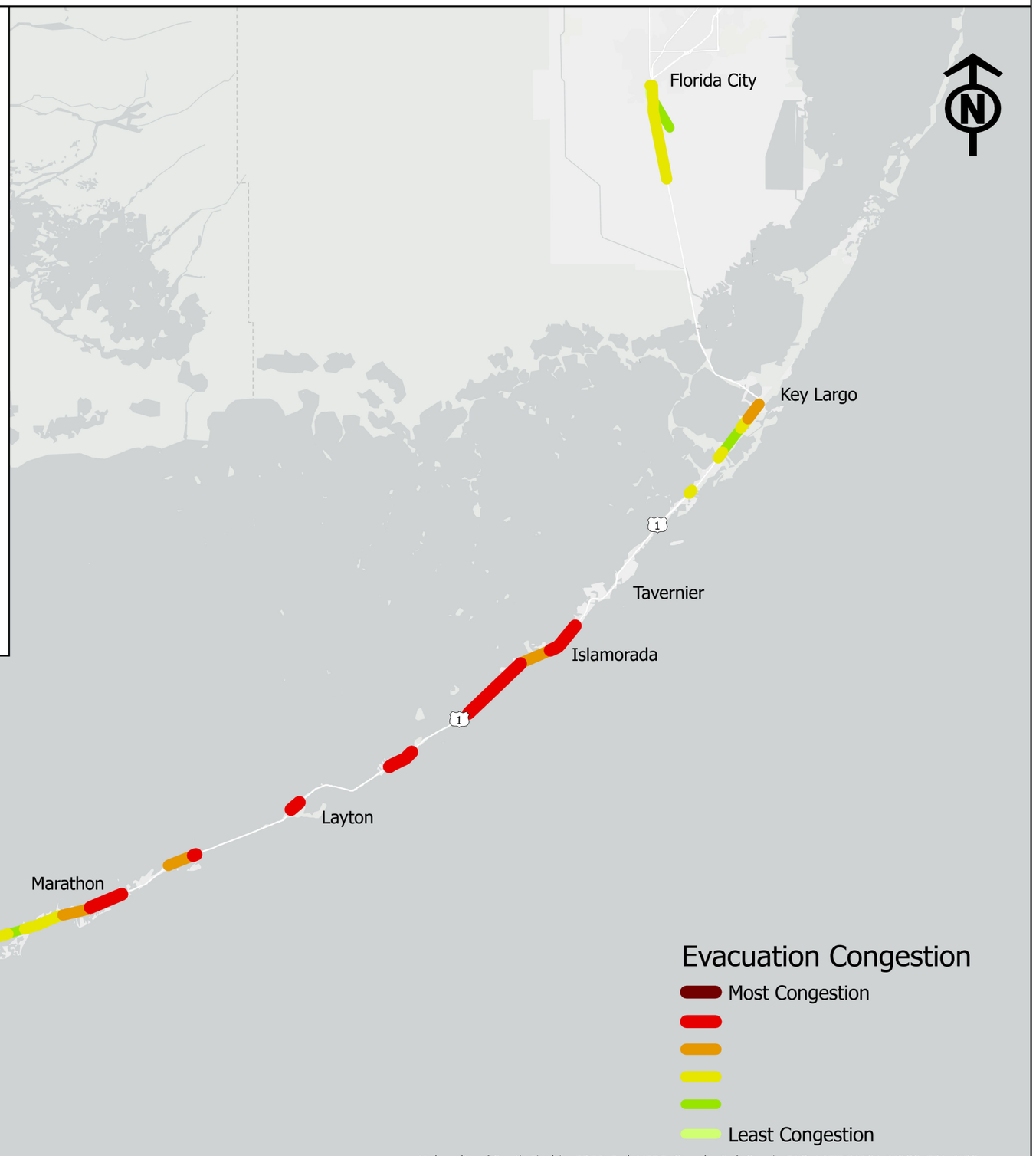




University of South Florida, FDEP, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS

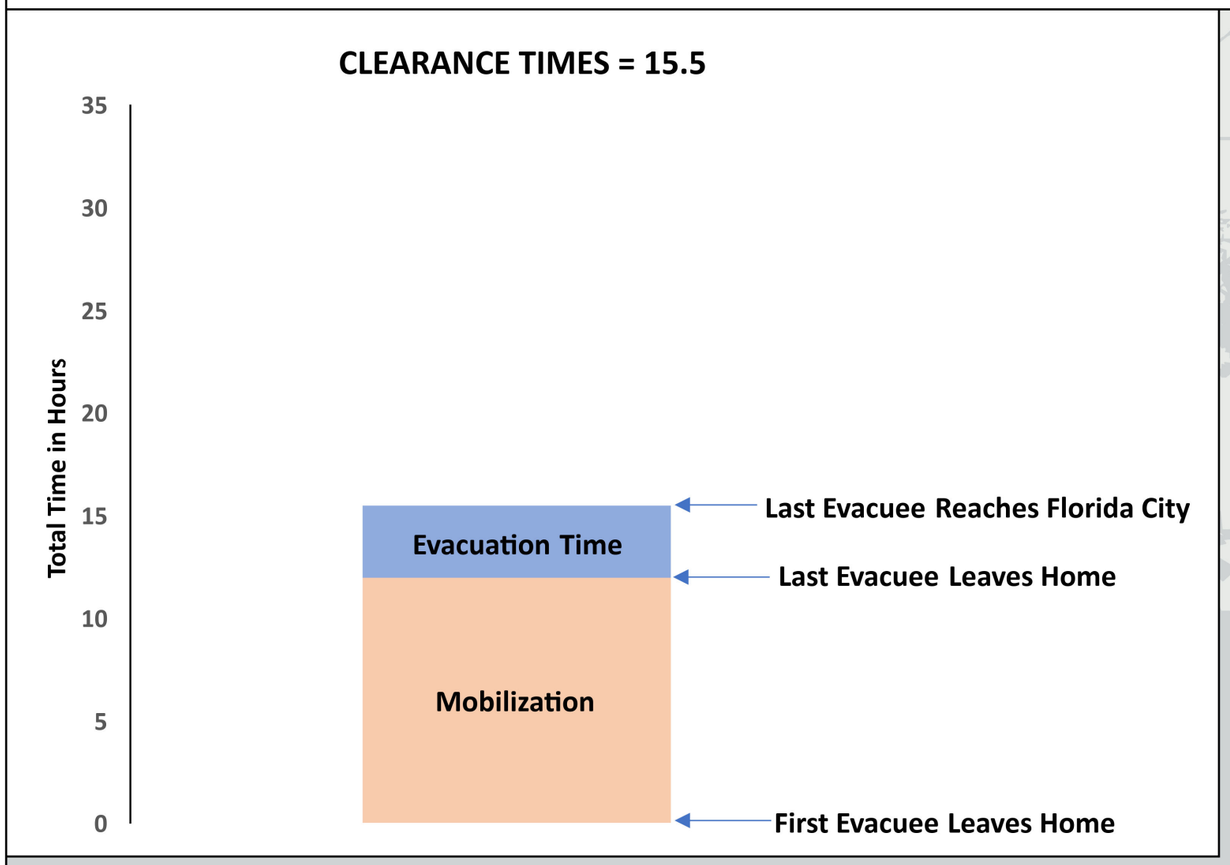
Scenario S1-B: Allocation of 3,550 Units Based on Population, Includes Key West and Excludes Mobile Homes - Phase II

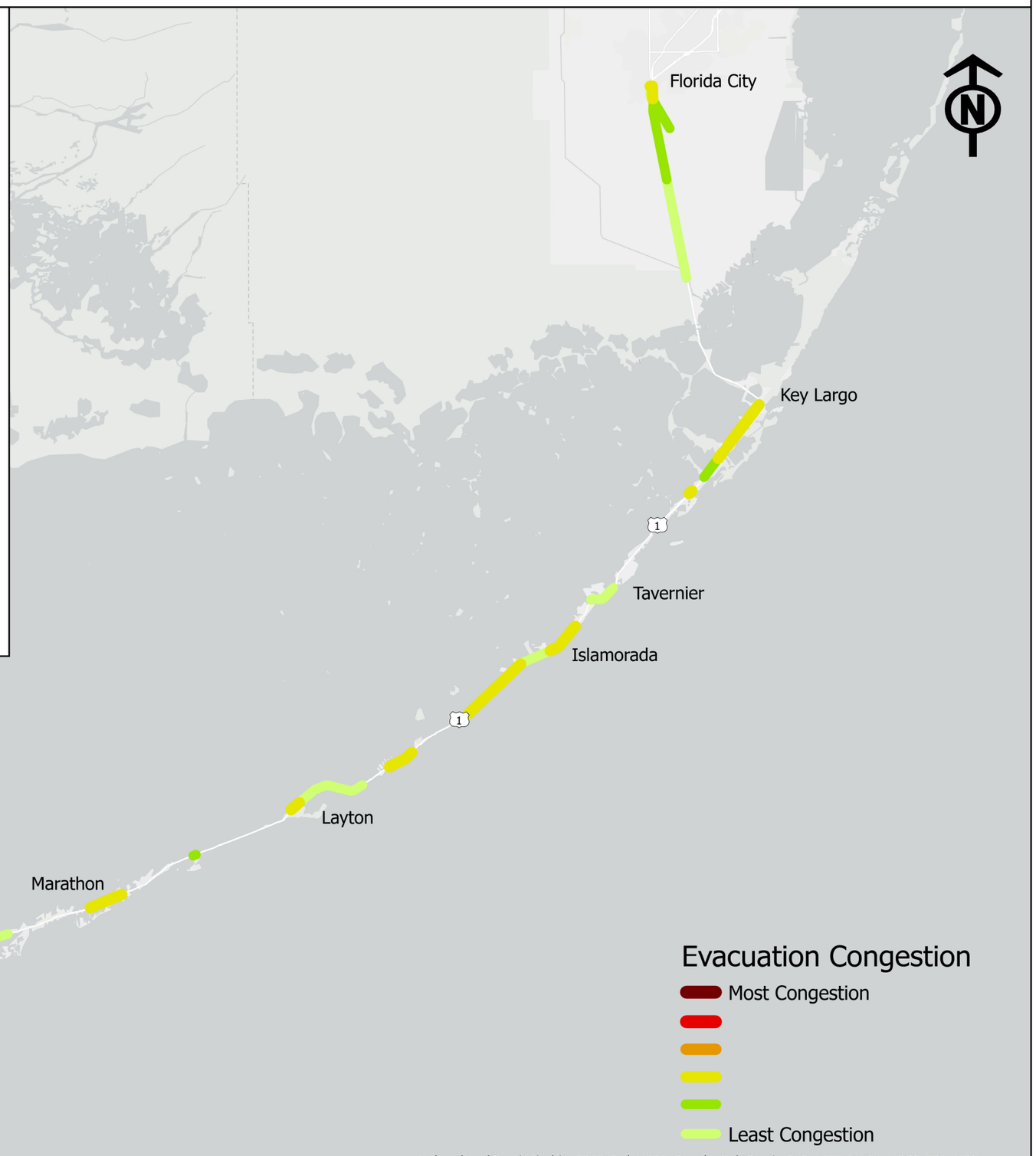




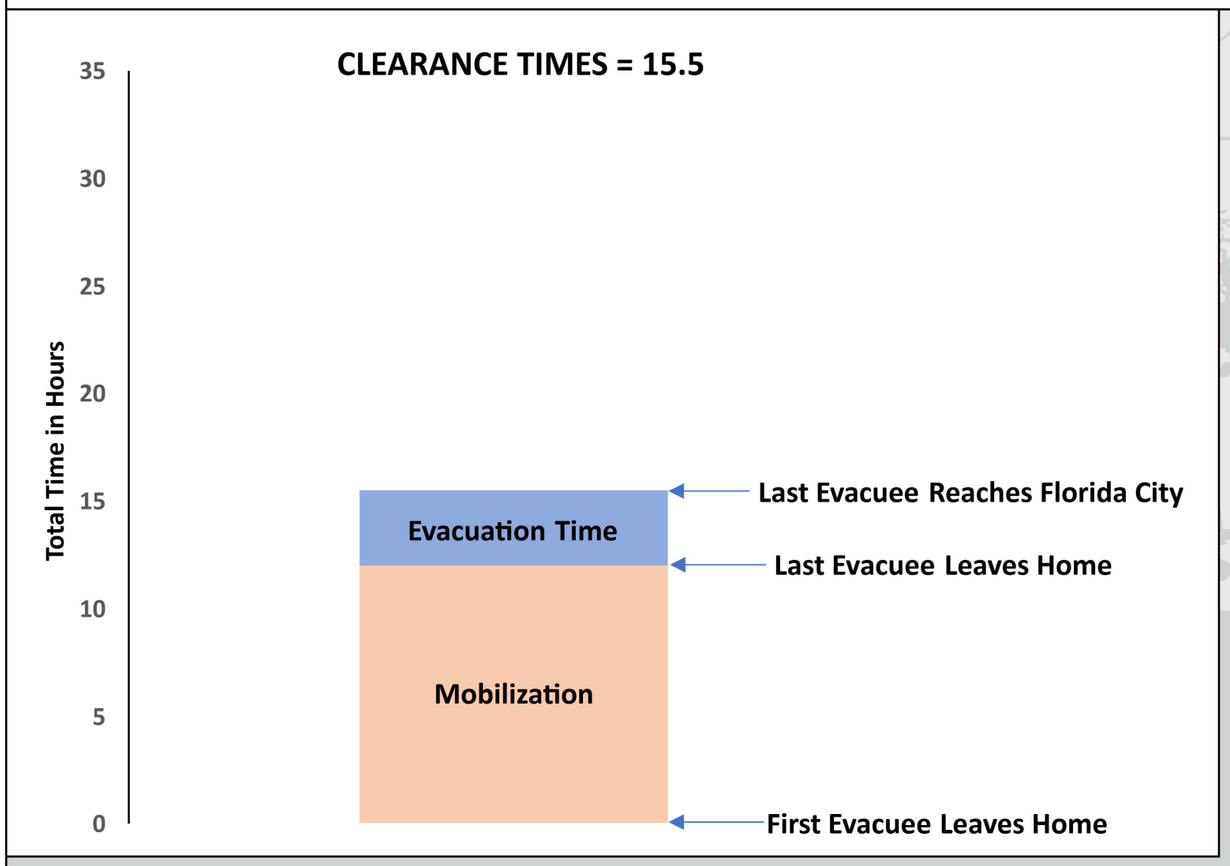
University of South Florida, FDEP, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS

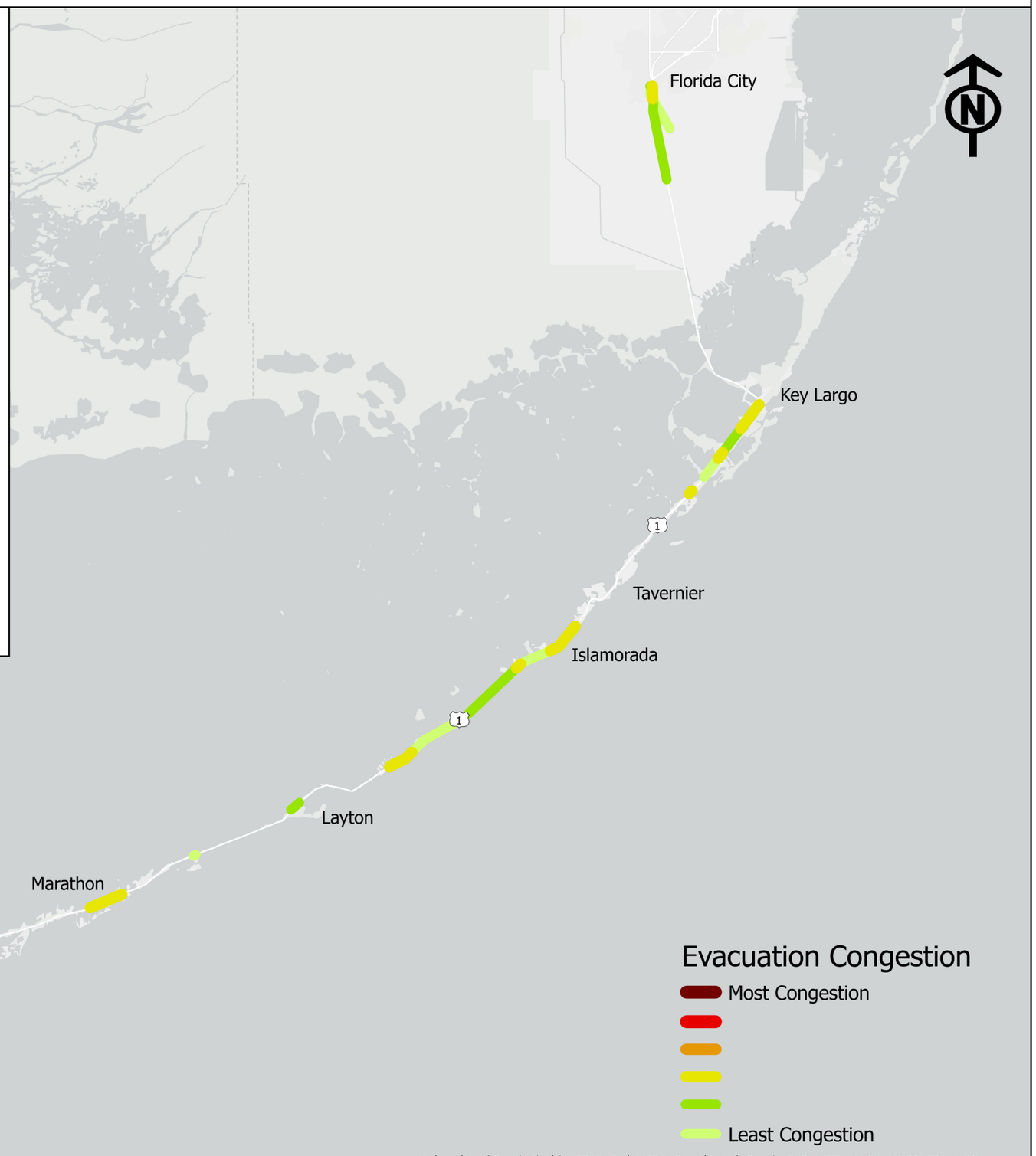
Scenario S1-C: Allocation of 3,550 Units Based on Population, Excludes Key West and Includes Mobile Homes - Phase II



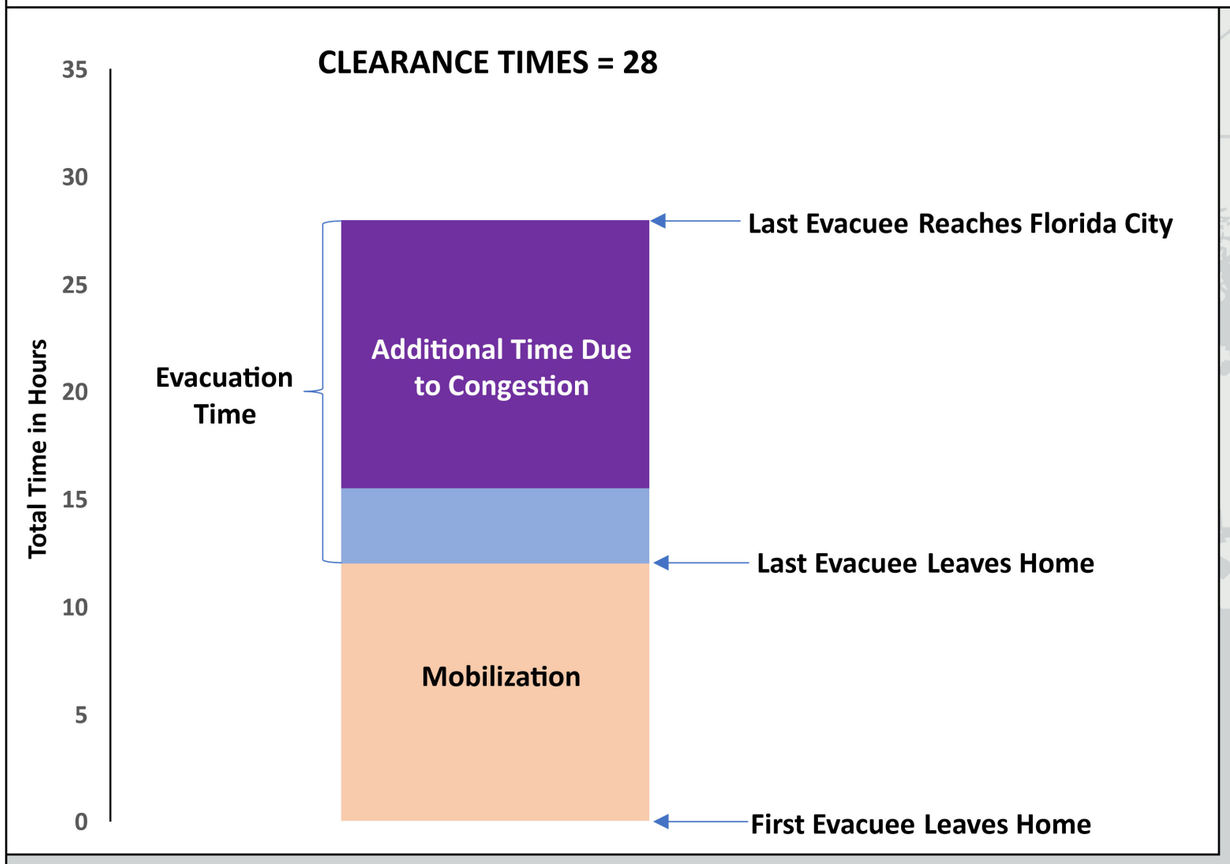


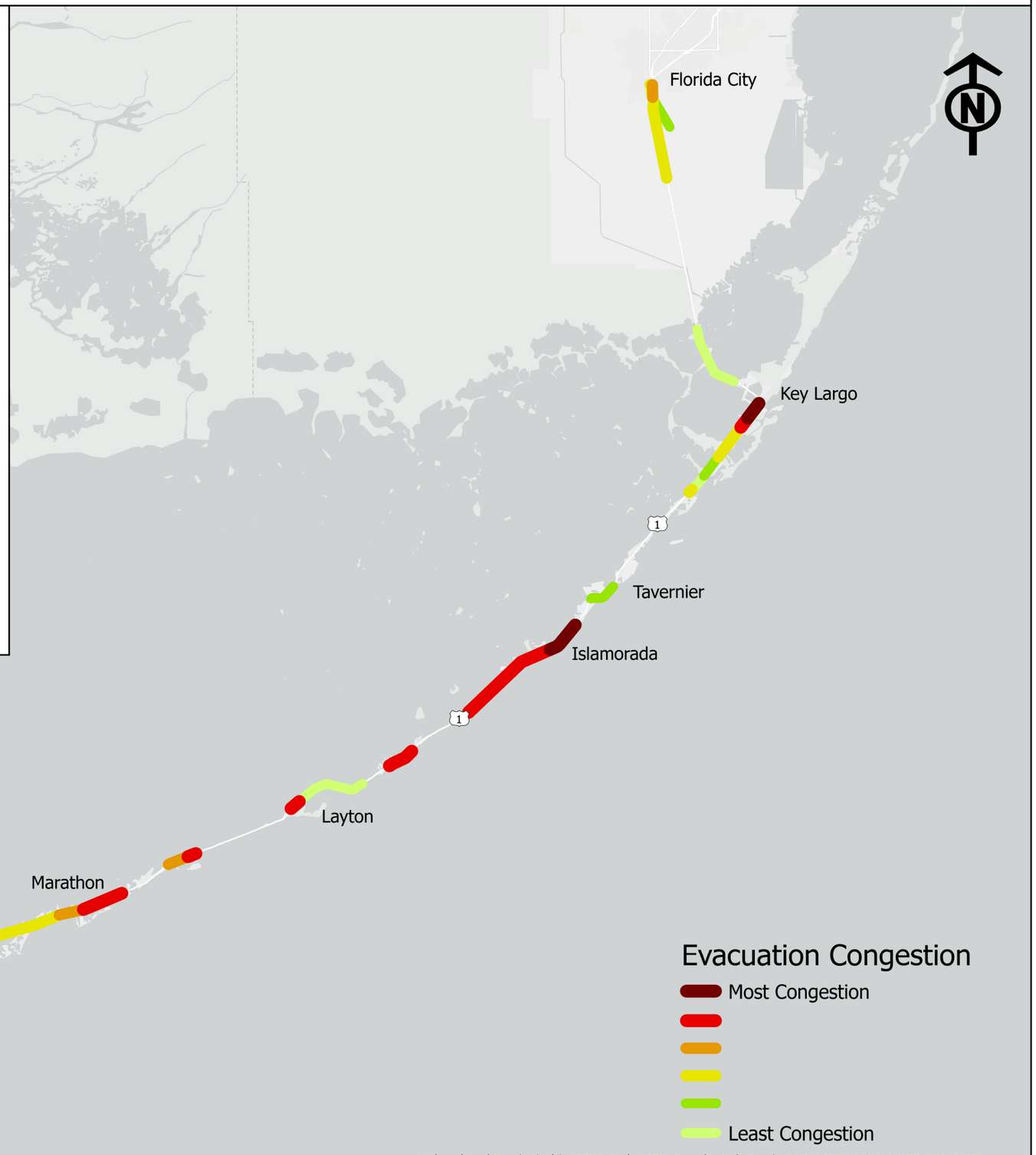
Scenario S1-D: Allocation of 3,550 Units Based on Population, Excludes Key West and Mobile Homes - Phase II





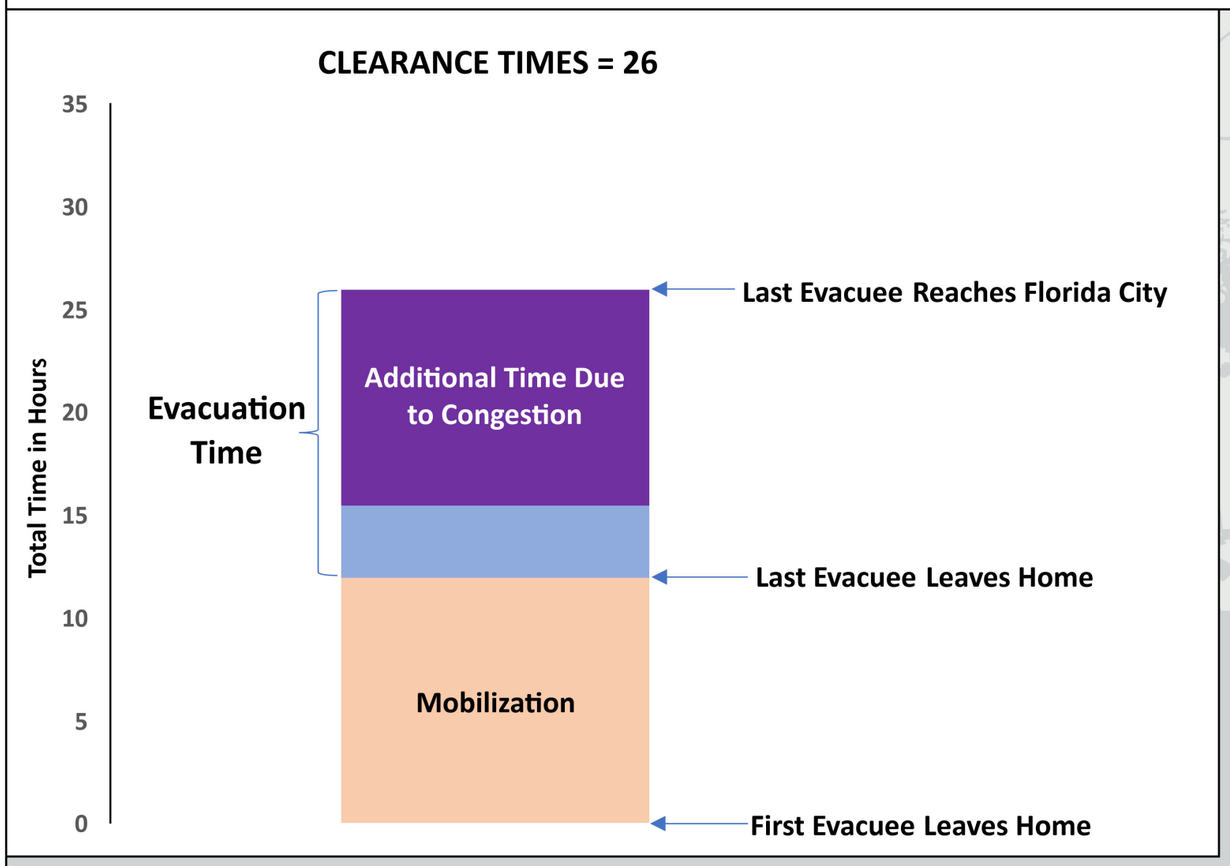
Scenario S2-A: Allocation of 3,550 Units Based on Available Land, Includes Key West and Mobile Homes - Phase II

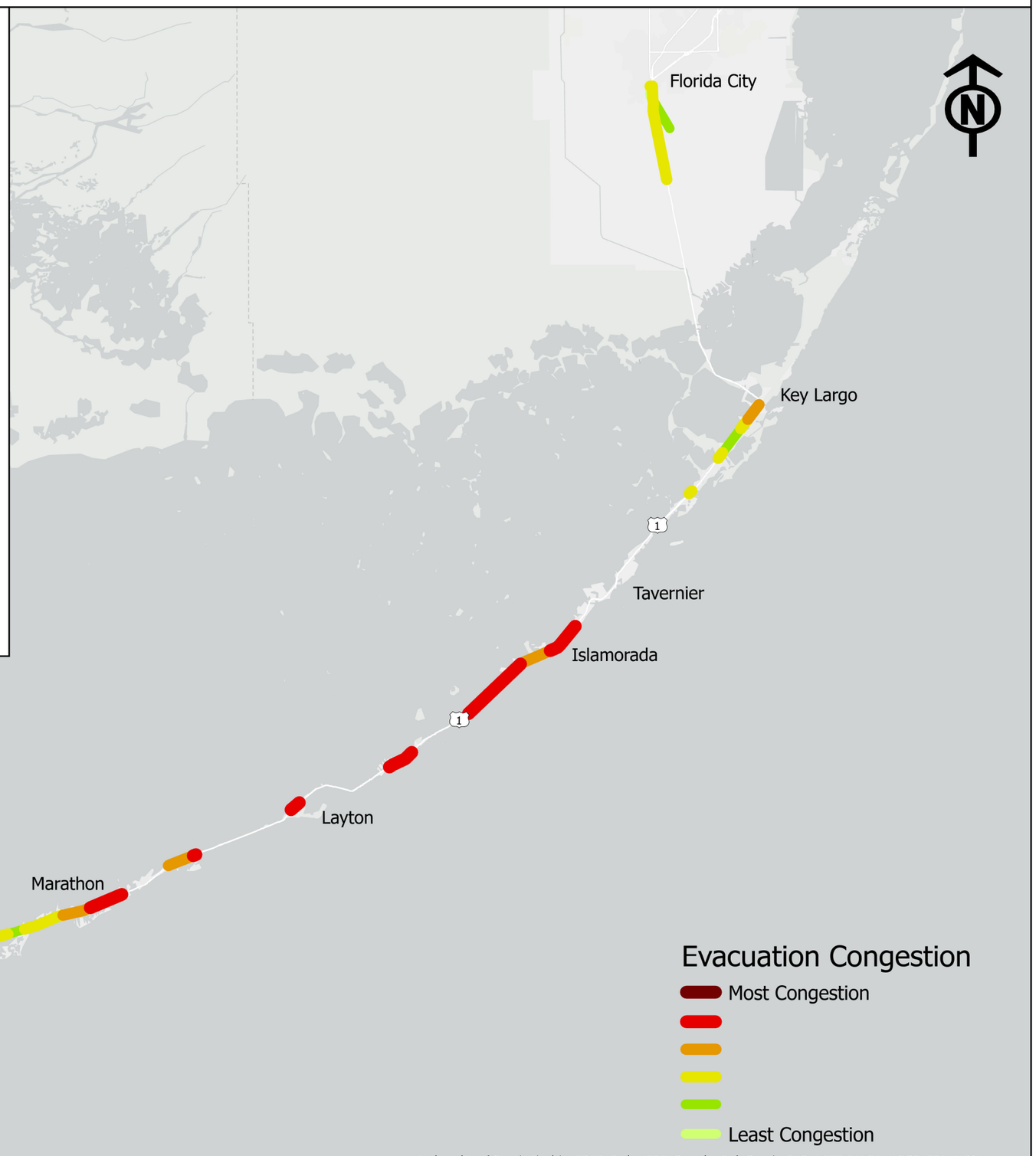




University of South Florida, FDEP, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS

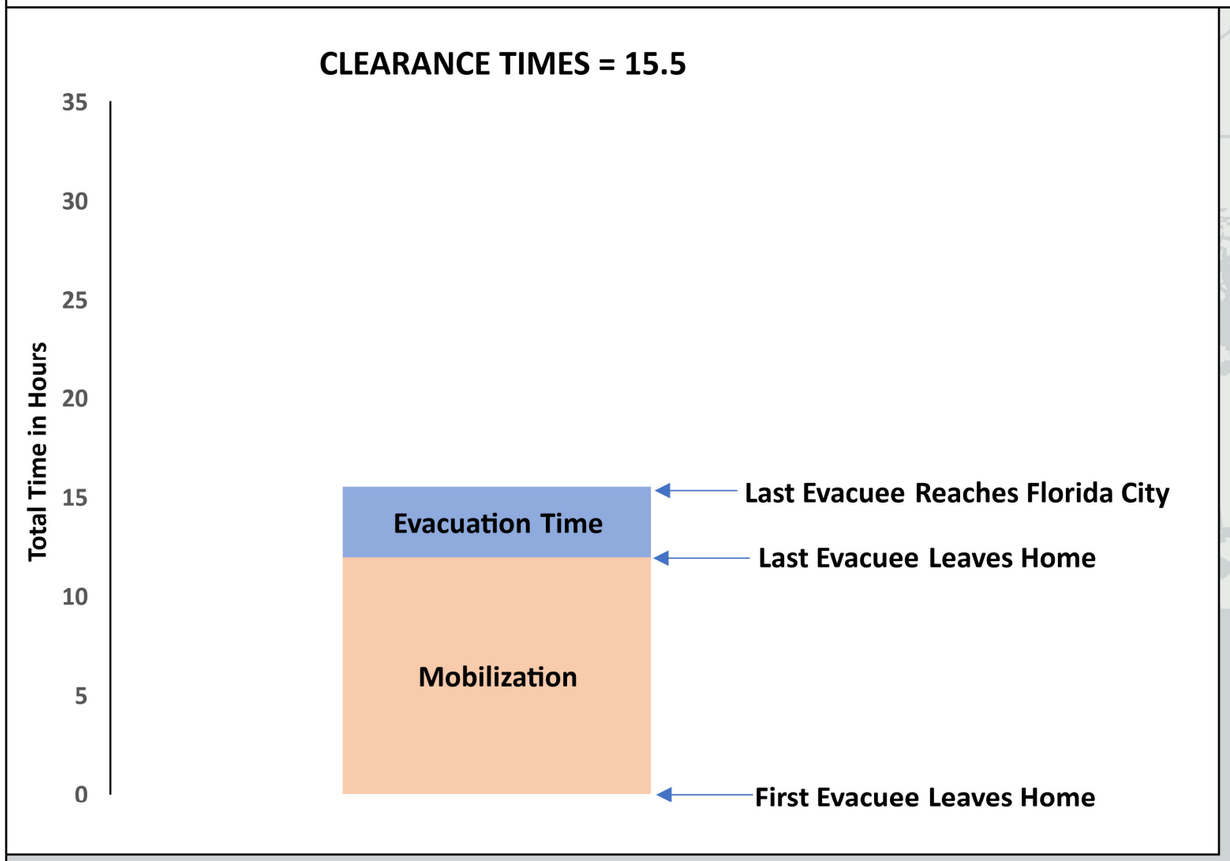
Scenario S2-B: Allocation of 3,550 Units Based on Available Land, Includes Key West and Excludes Mobile Homes - Phase II

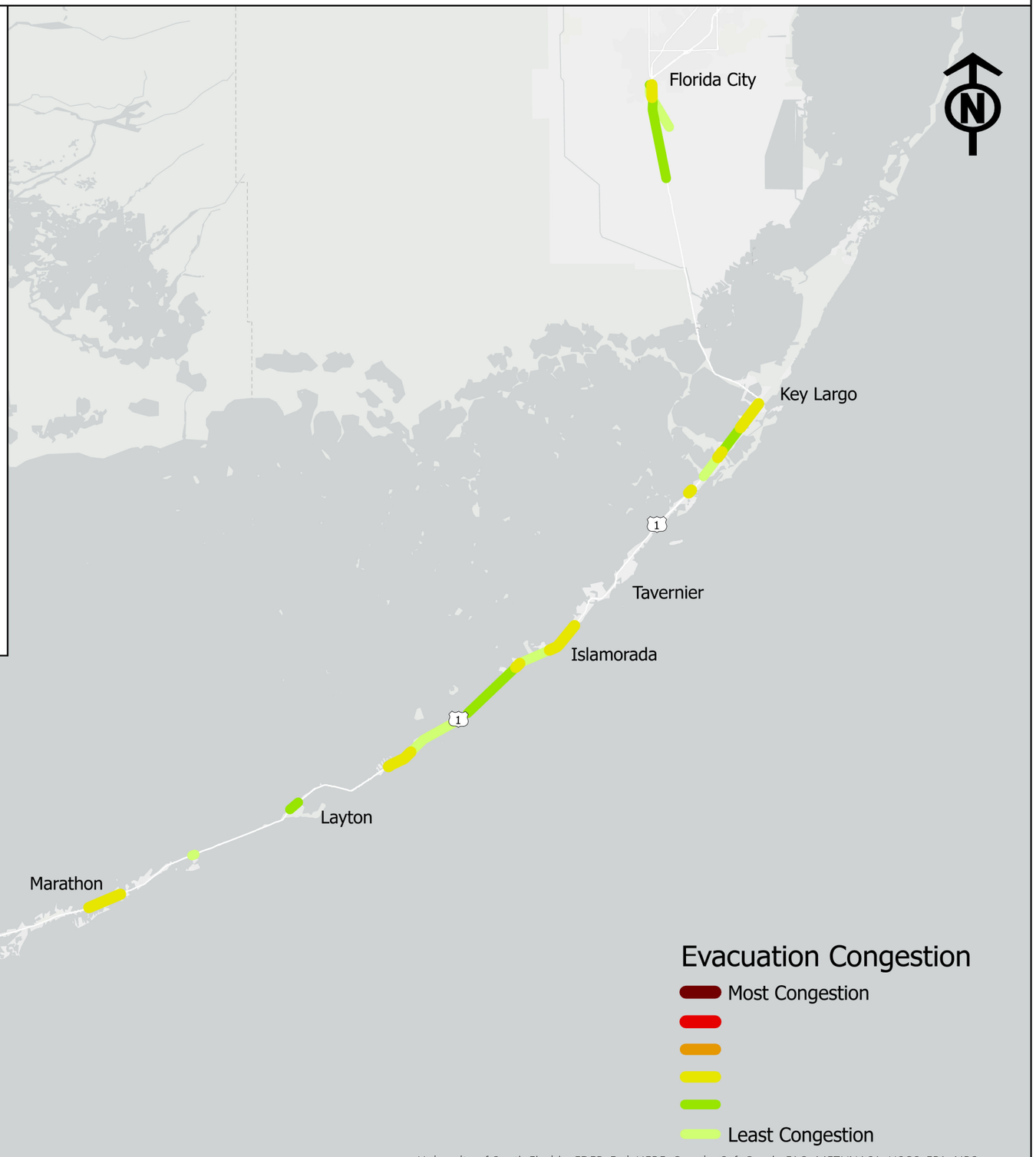




University of South Florida, FDEP, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS

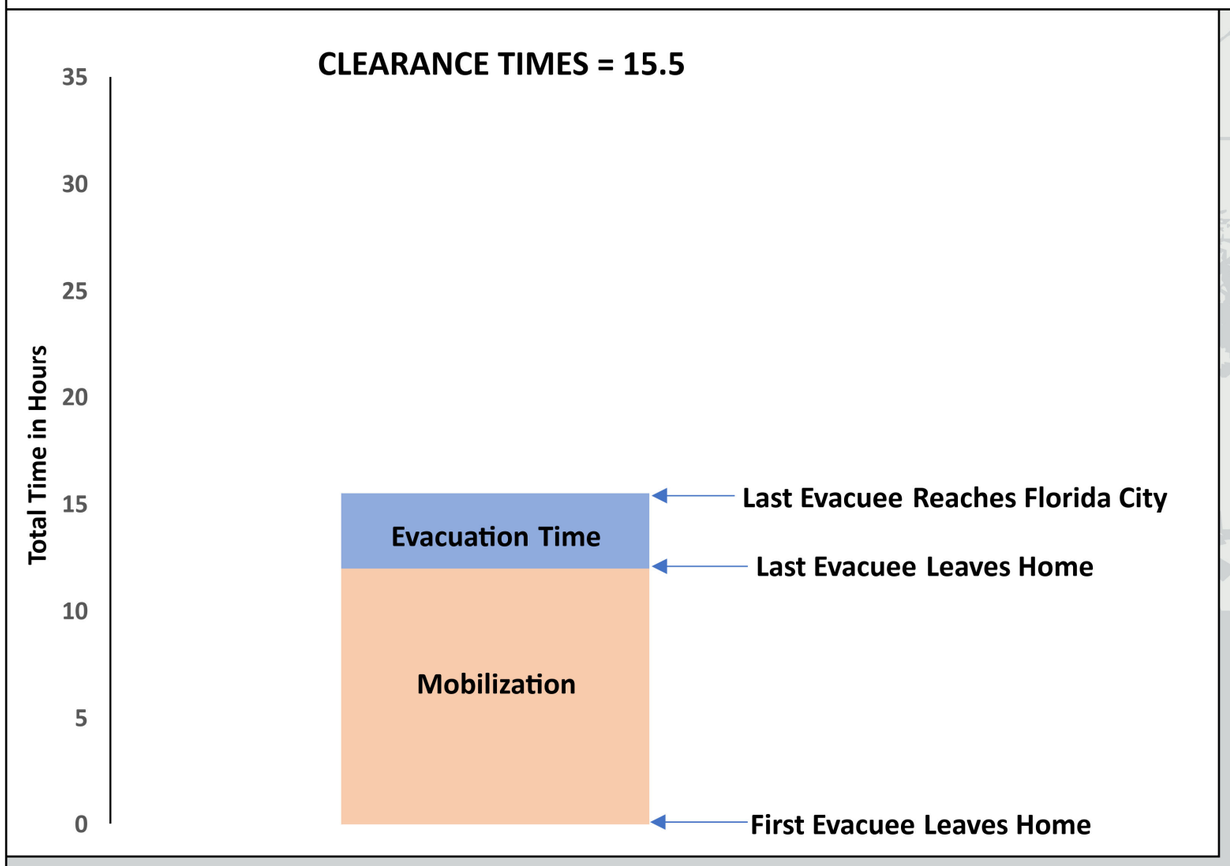
Scenario S2-C: Allocation of 3,550 Units Based on Available Land, Excludes Key West and Includes Mobile Homes - Phase II

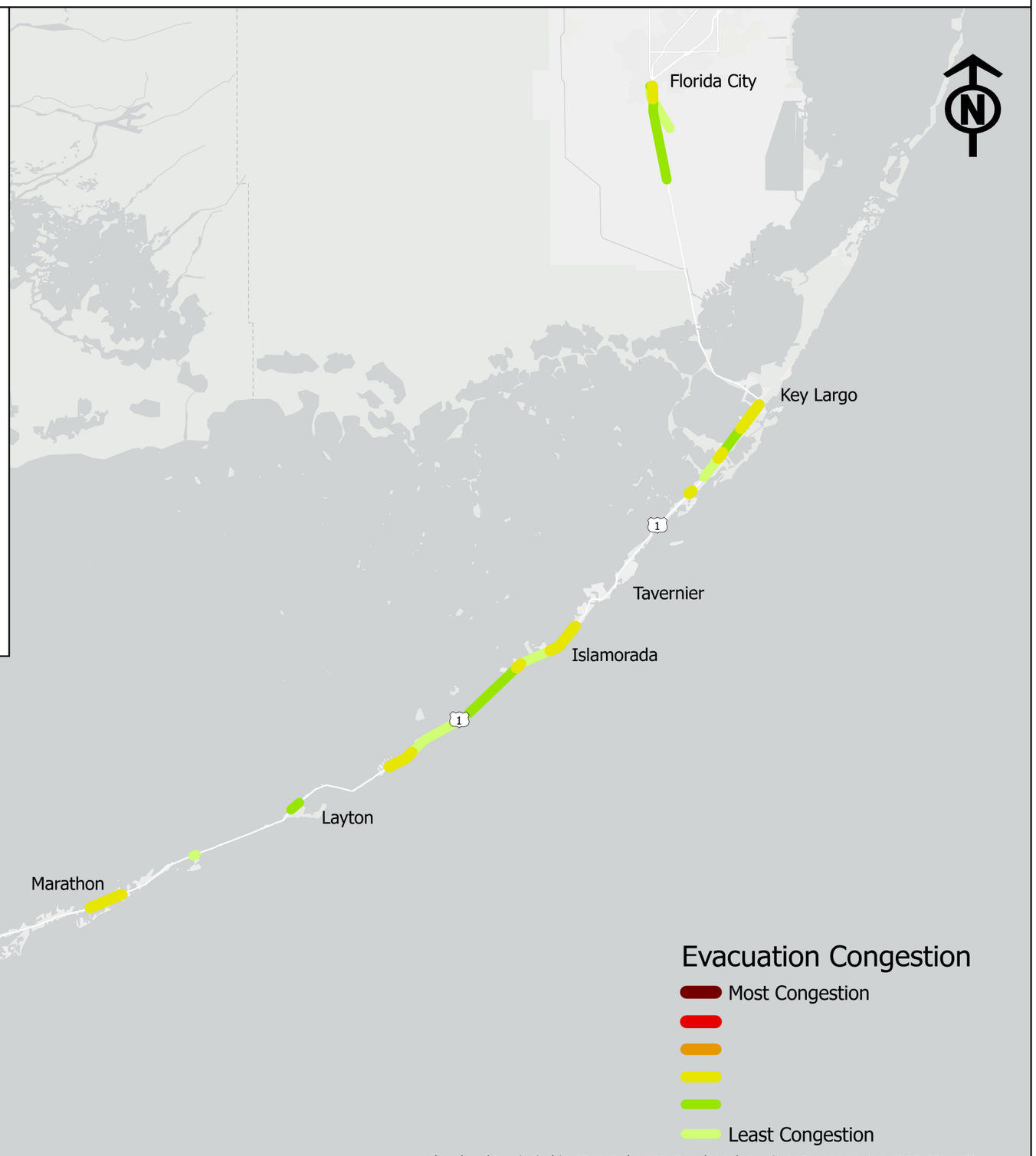




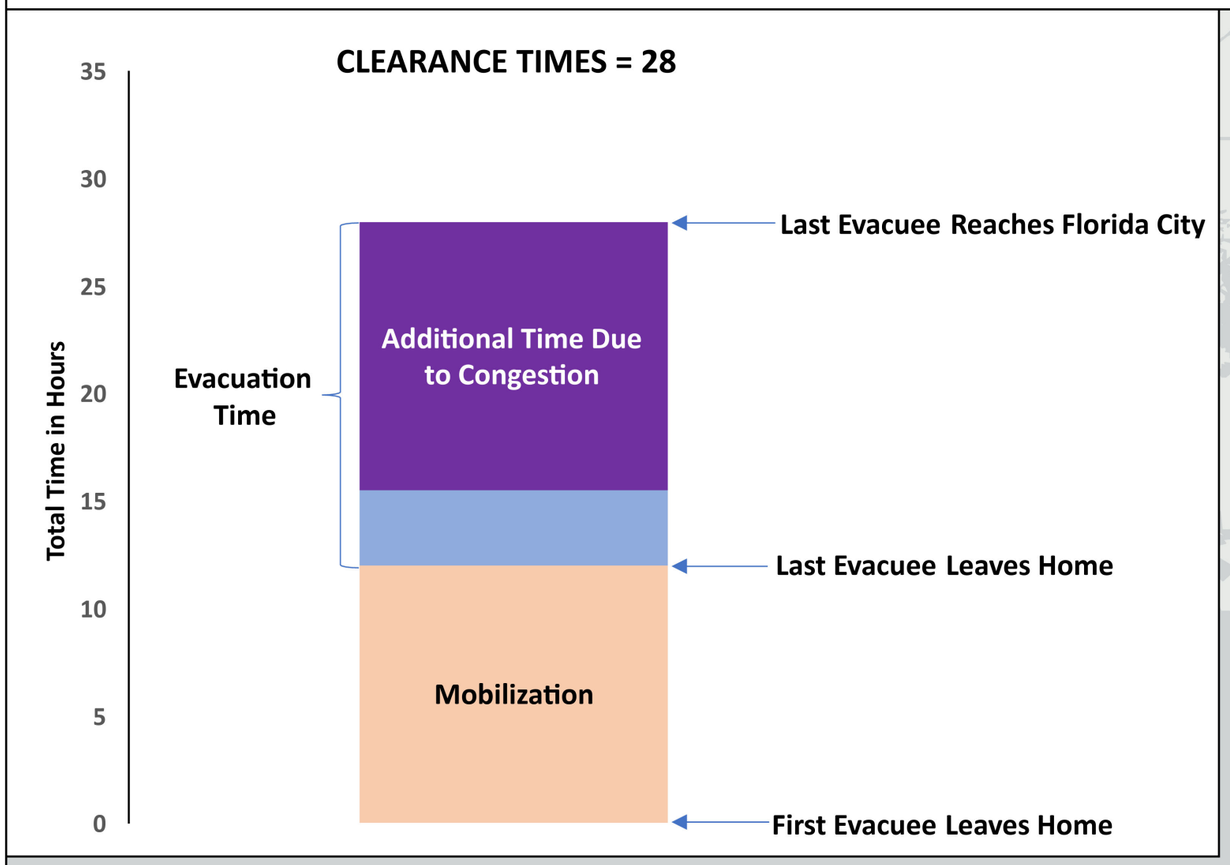
University of South Florida, FDEP, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS

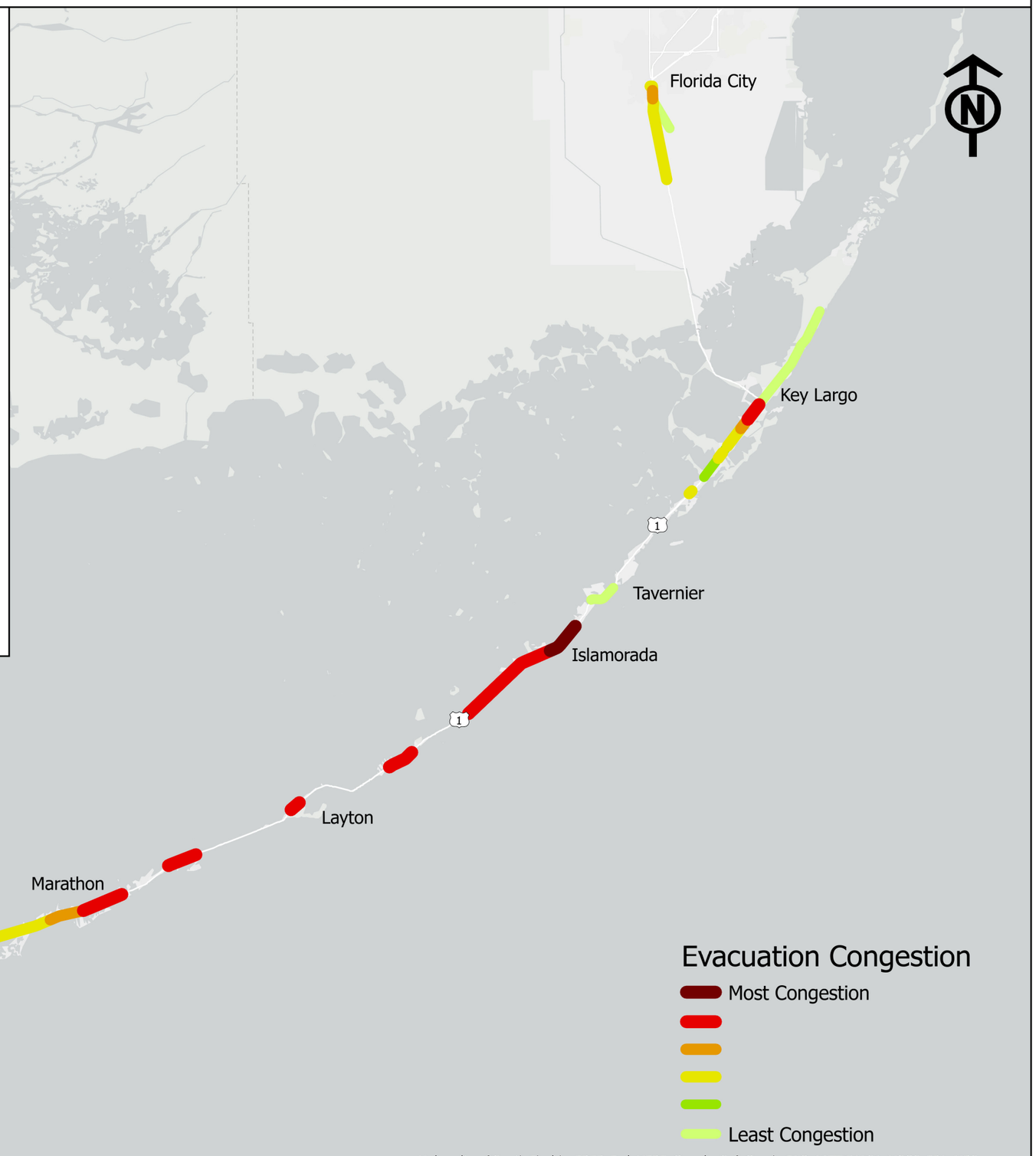
Scenario S2-D: Allocation of 3,550 Units Based on Available Land, Excludes Key West and Mobile Homes - Phase II





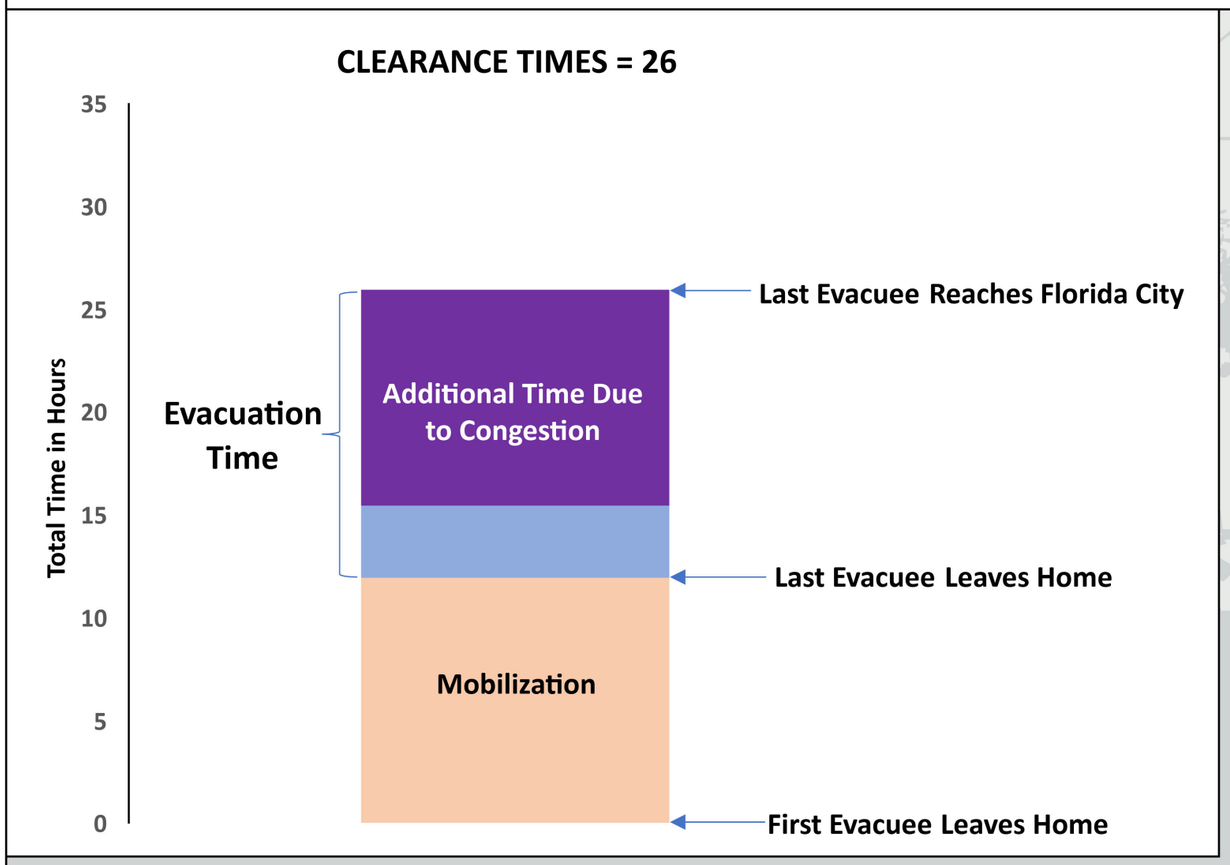
Scenario S3-A: Allocation of 3,550 Units Based on Current Allocation, Includes Key West and Mobile Homes - Phase II

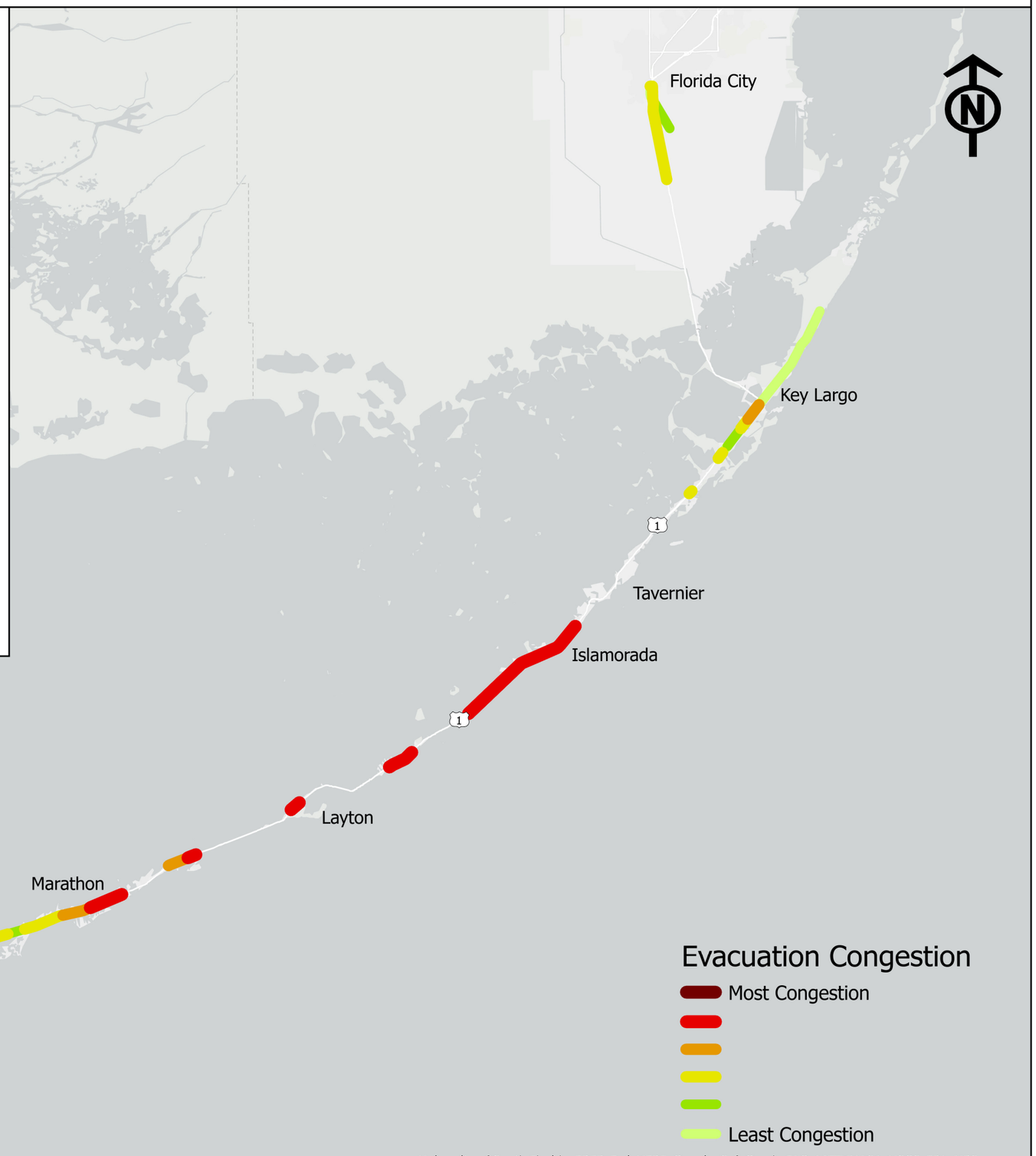




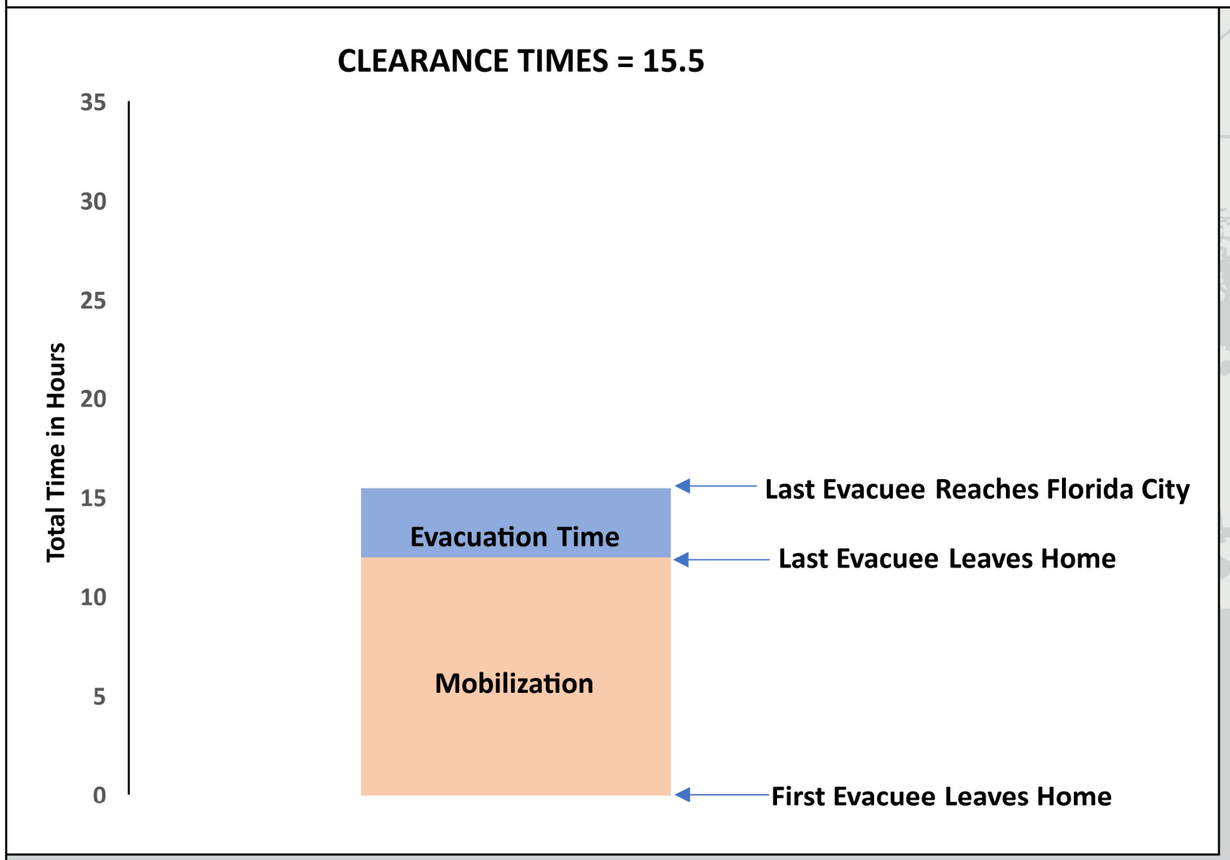
University of South Florida, FDEP, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS

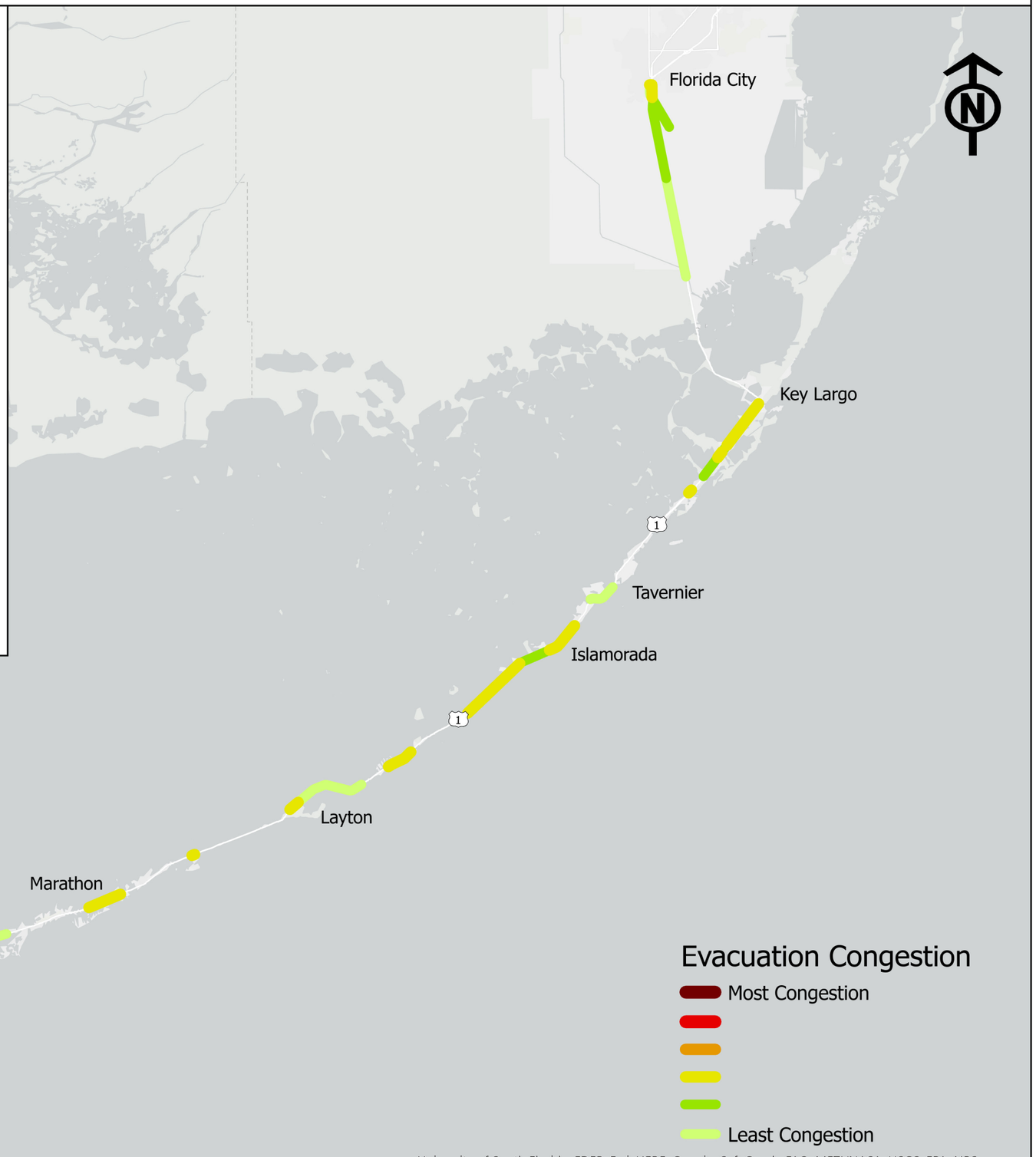
Scenario S3-B: Allocation of 3,550 Units Based on Current Allocation, Includes Key West and Excludes Mobile Homes - Phase II



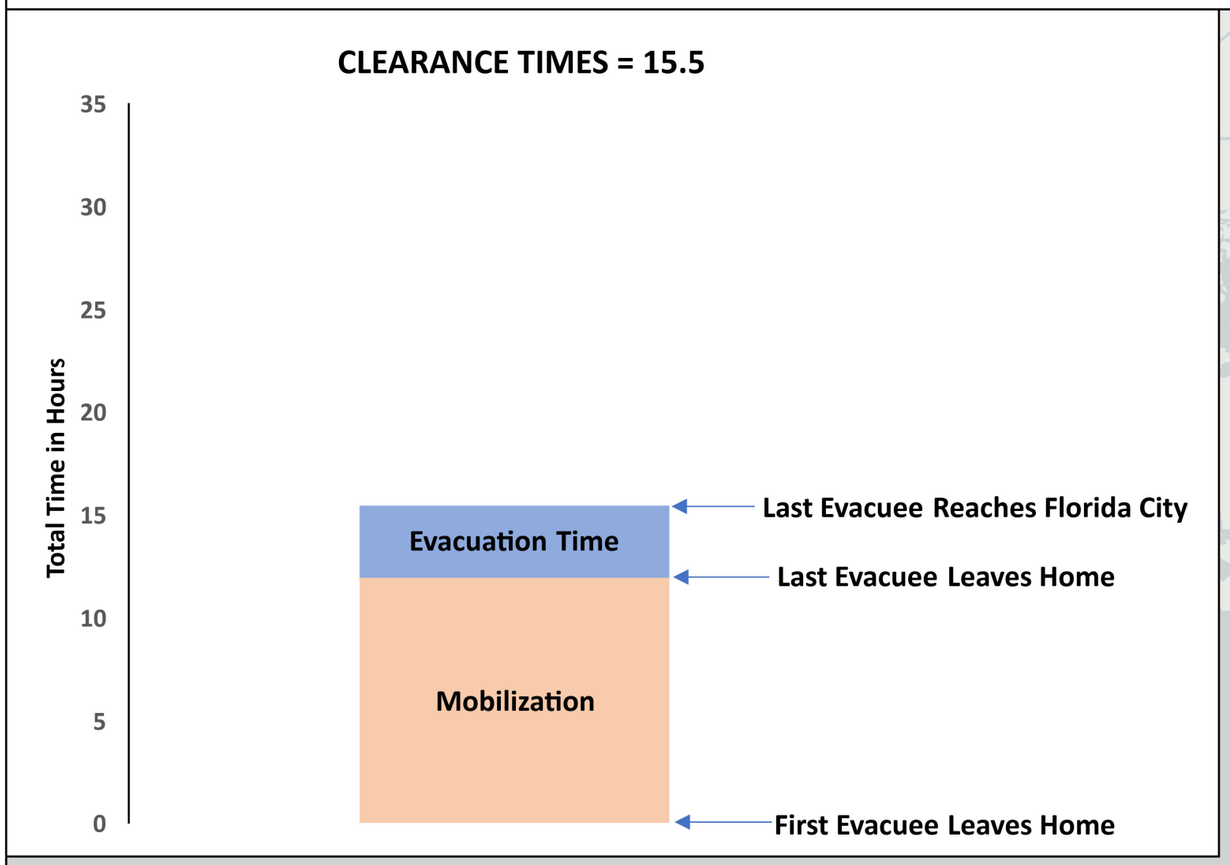


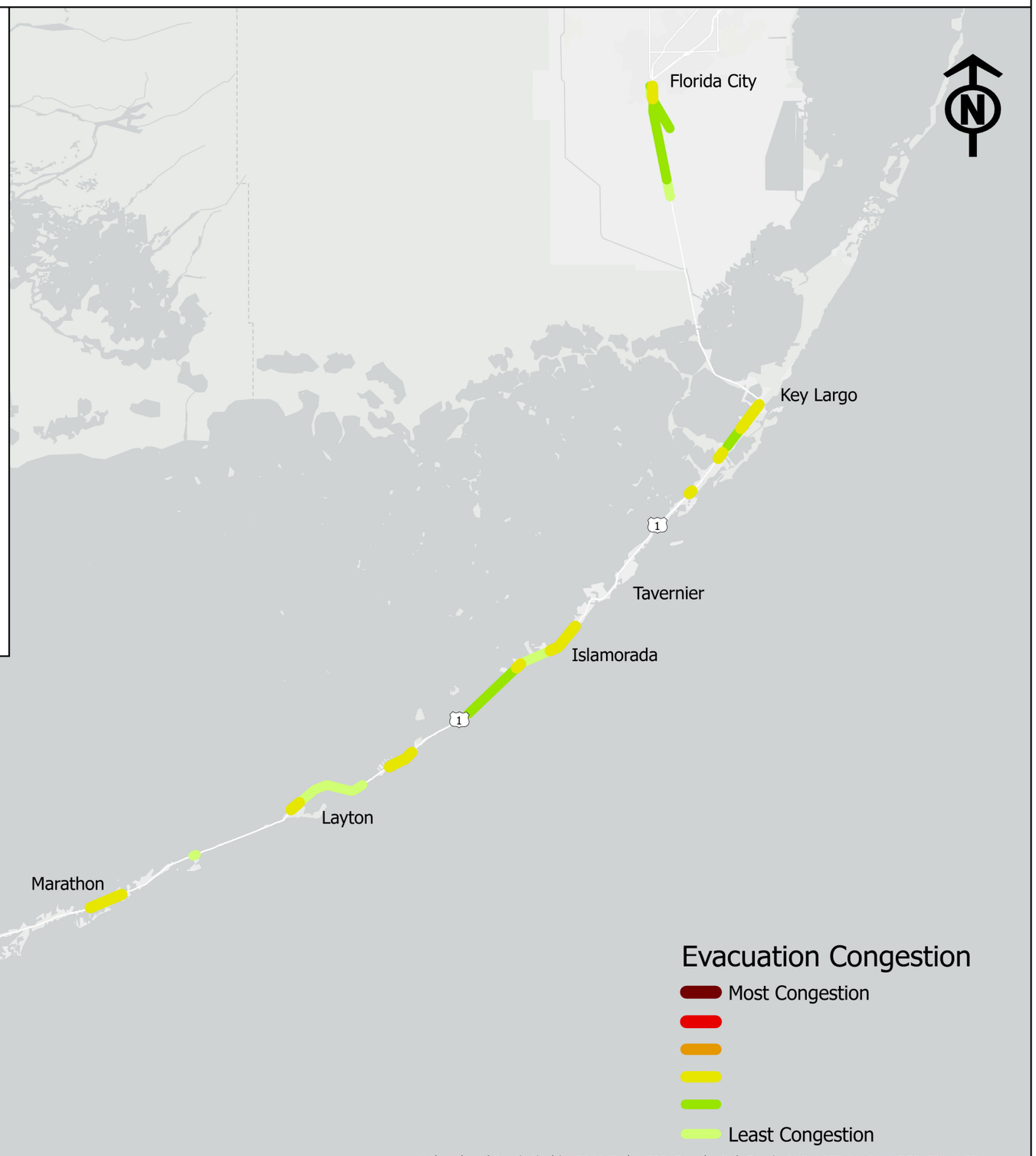
Scenario S3-C: Allocation of 3,550 Units Based on Current Allocation, Excludes Key West and Includes Mobile Homes - Phase II



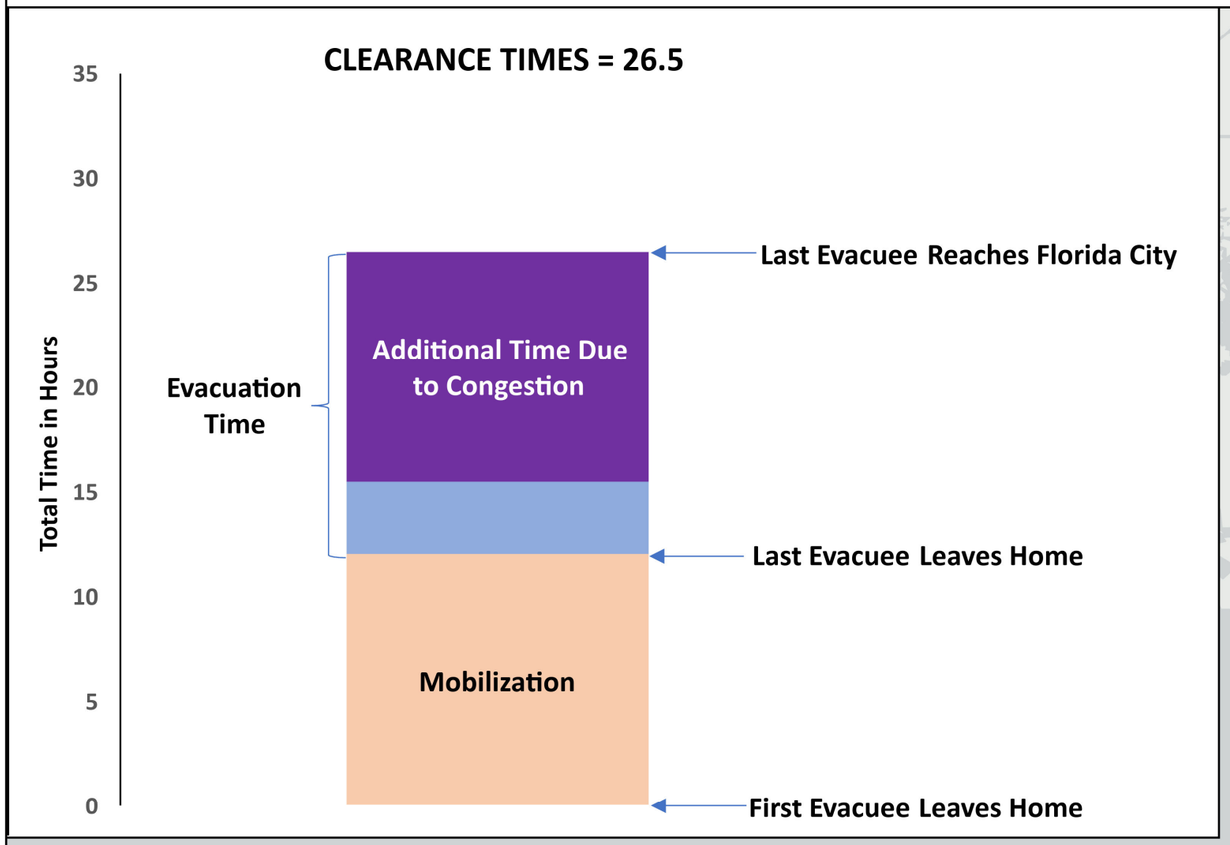


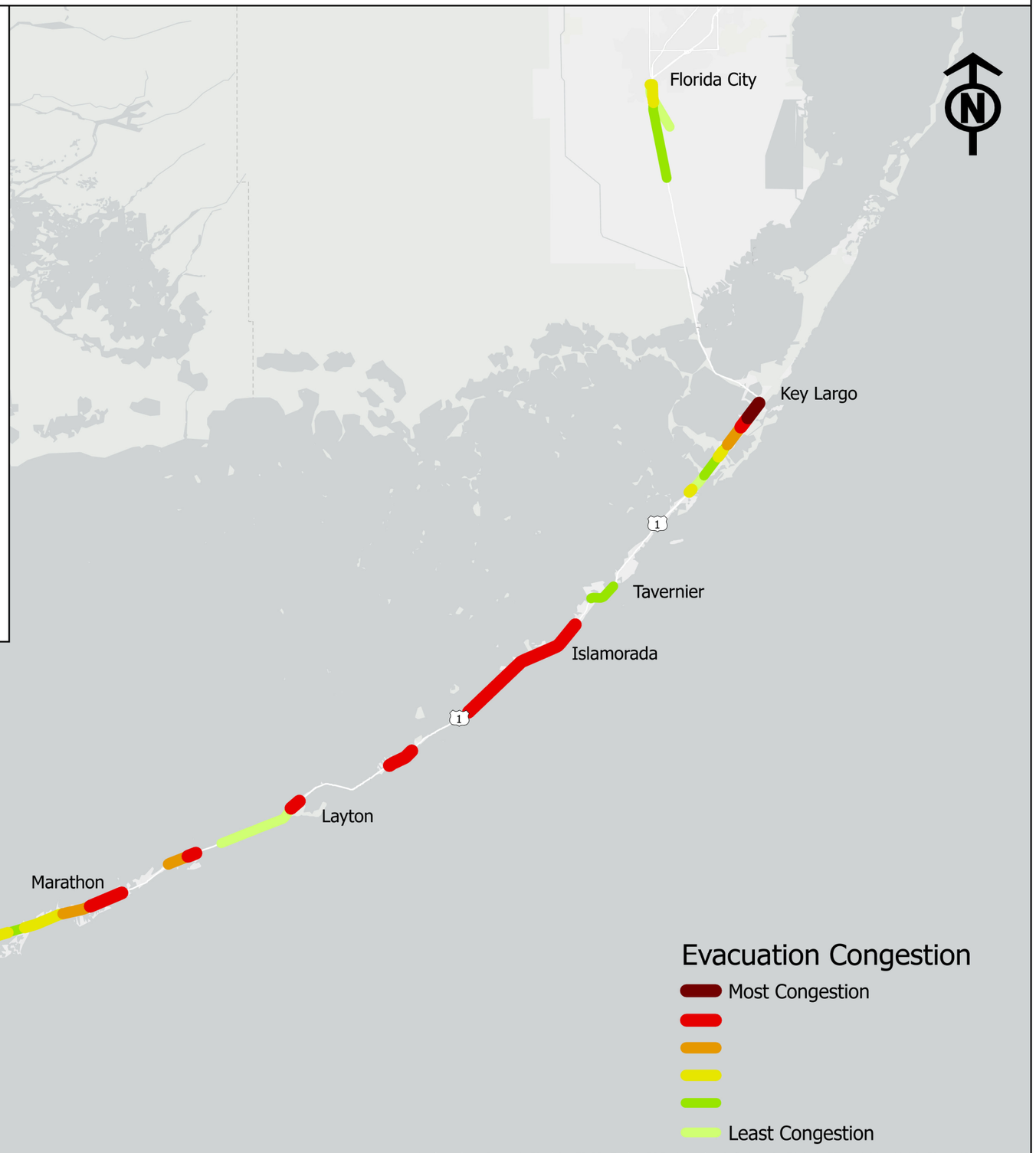
Scenario S3-D: Allocation of 3,550 Units Based on Current Allocation, Excludes Key West and Mobile Homes - Phase II





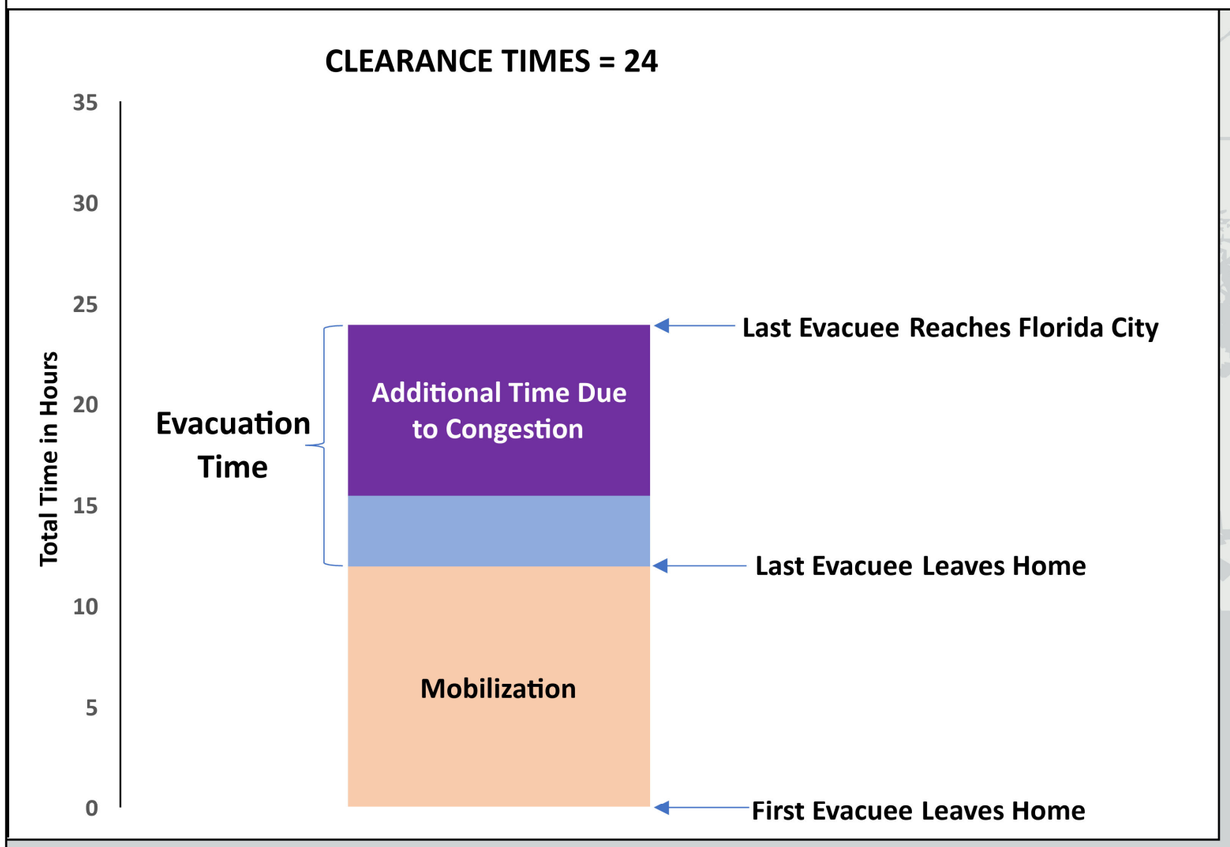
Scenario S4A-A: Allocation of 110 Units Based on Minimum 10 Year Allocation, Includes Key West and Mobile Homes - Phase II

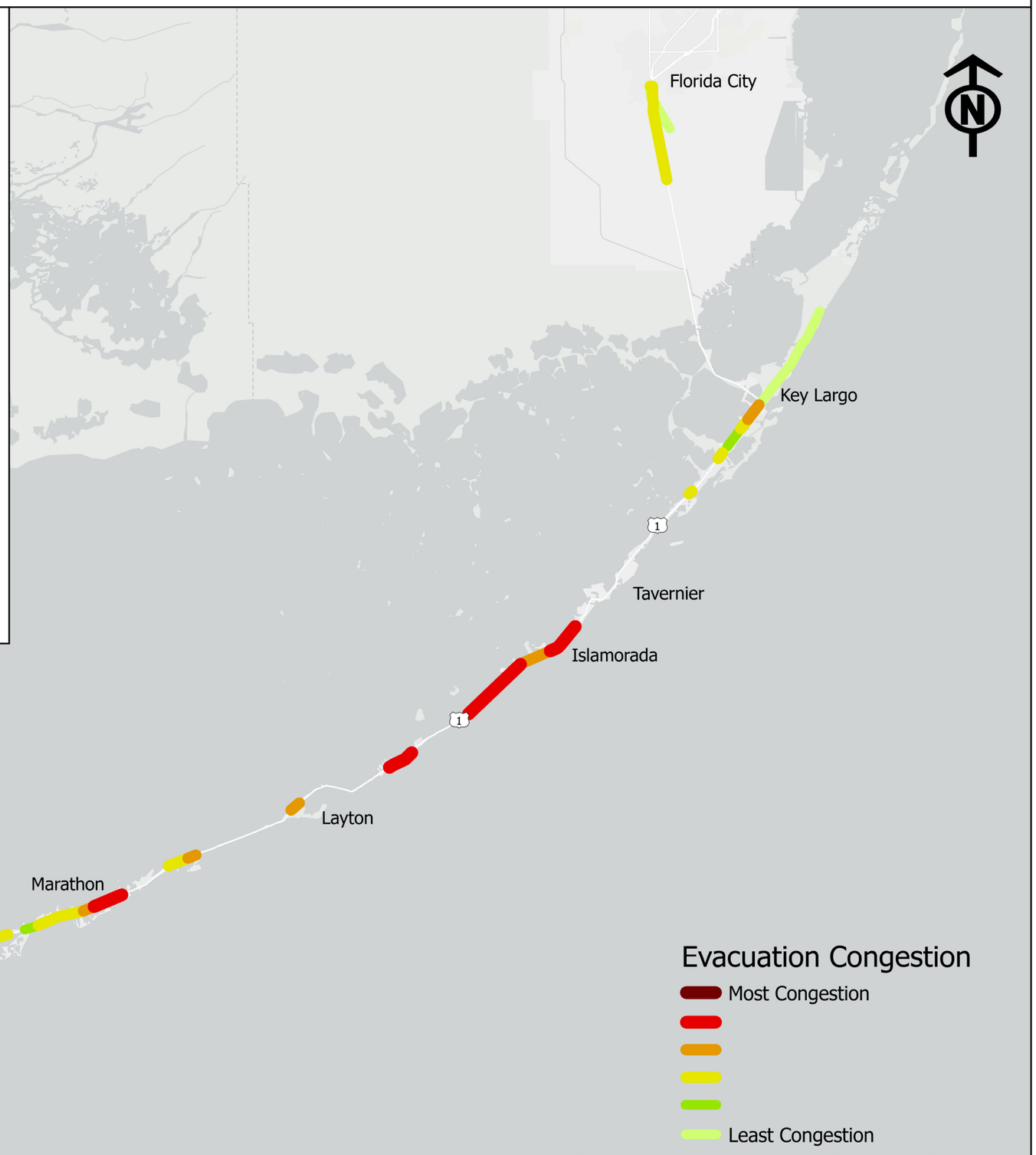




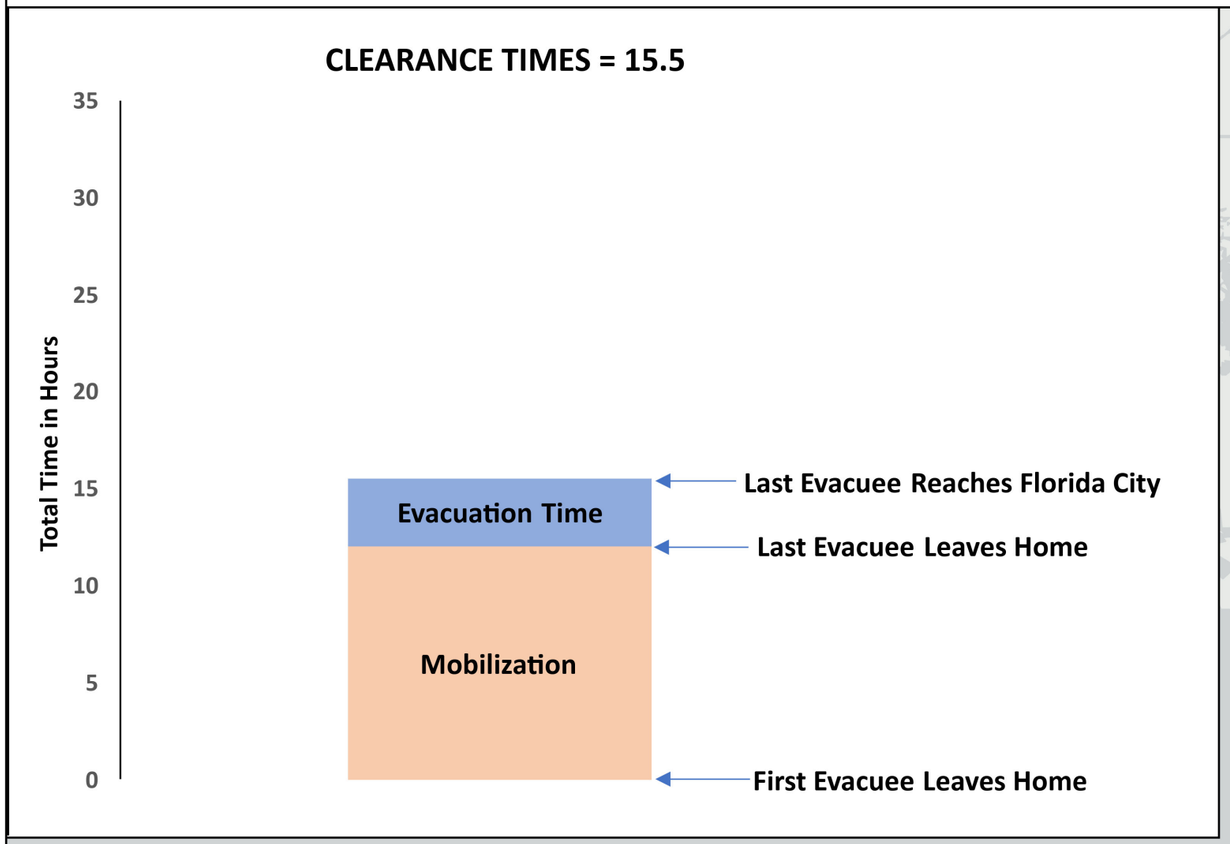
University of South Florida, FDEP, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS

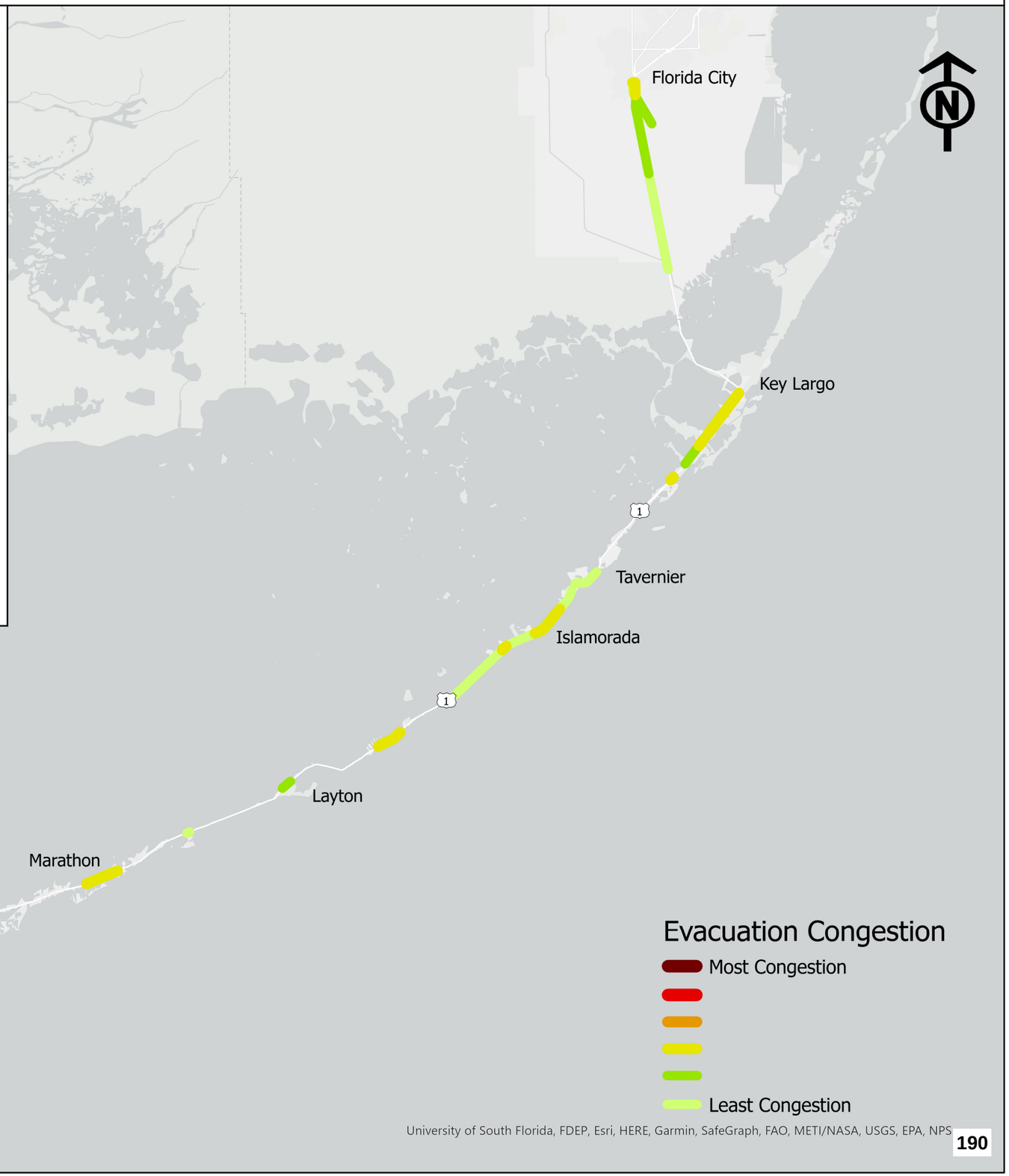
Scenario S4A-B: Allocation of 110 Units Based on Minimum 10 Year Allocation, Includes Key West and Excludes Mobile Homes - Phase II



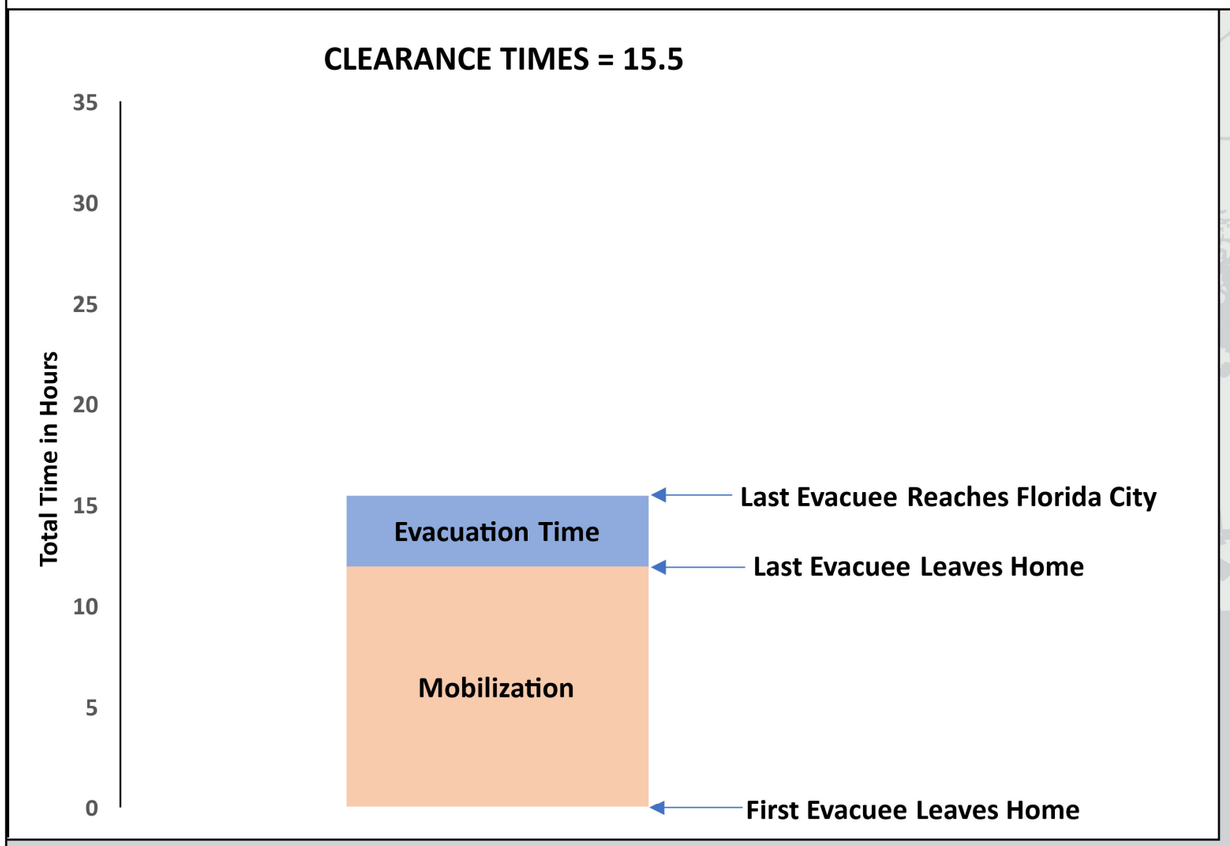


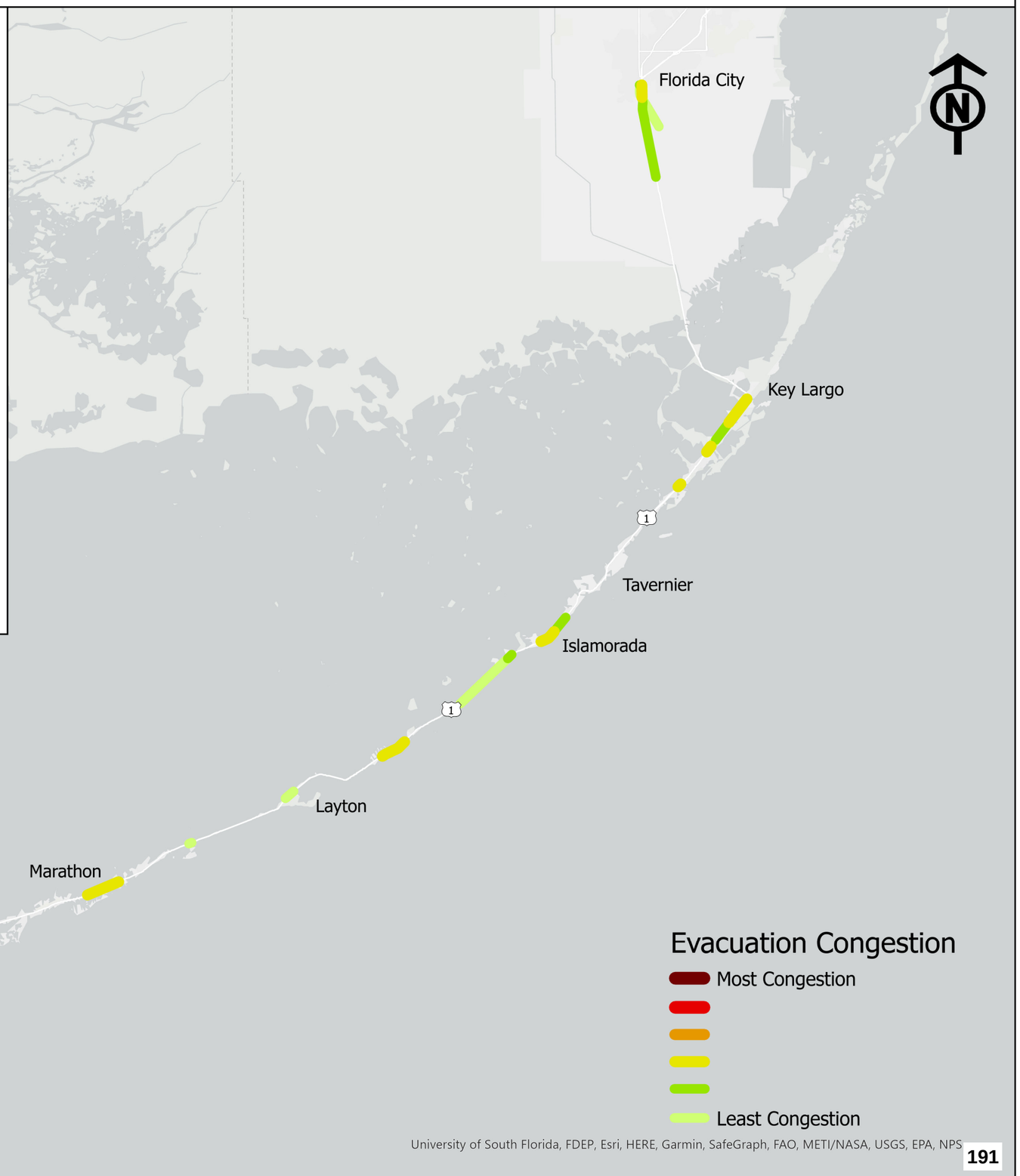
Scenario S4A-C: Allocation of 110 Units Based on Minimum 10 Year Allocation, Excludes Key West and Includes Mobile Homes - Phase II



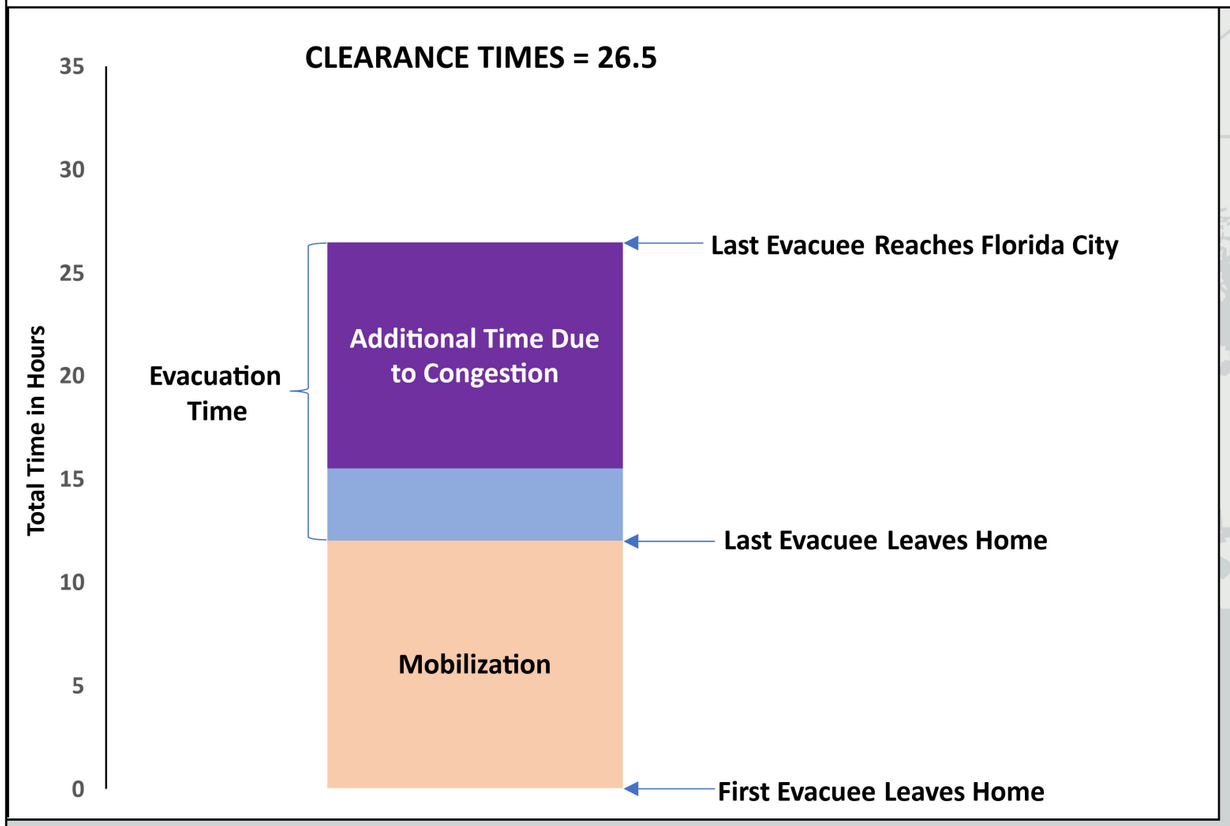


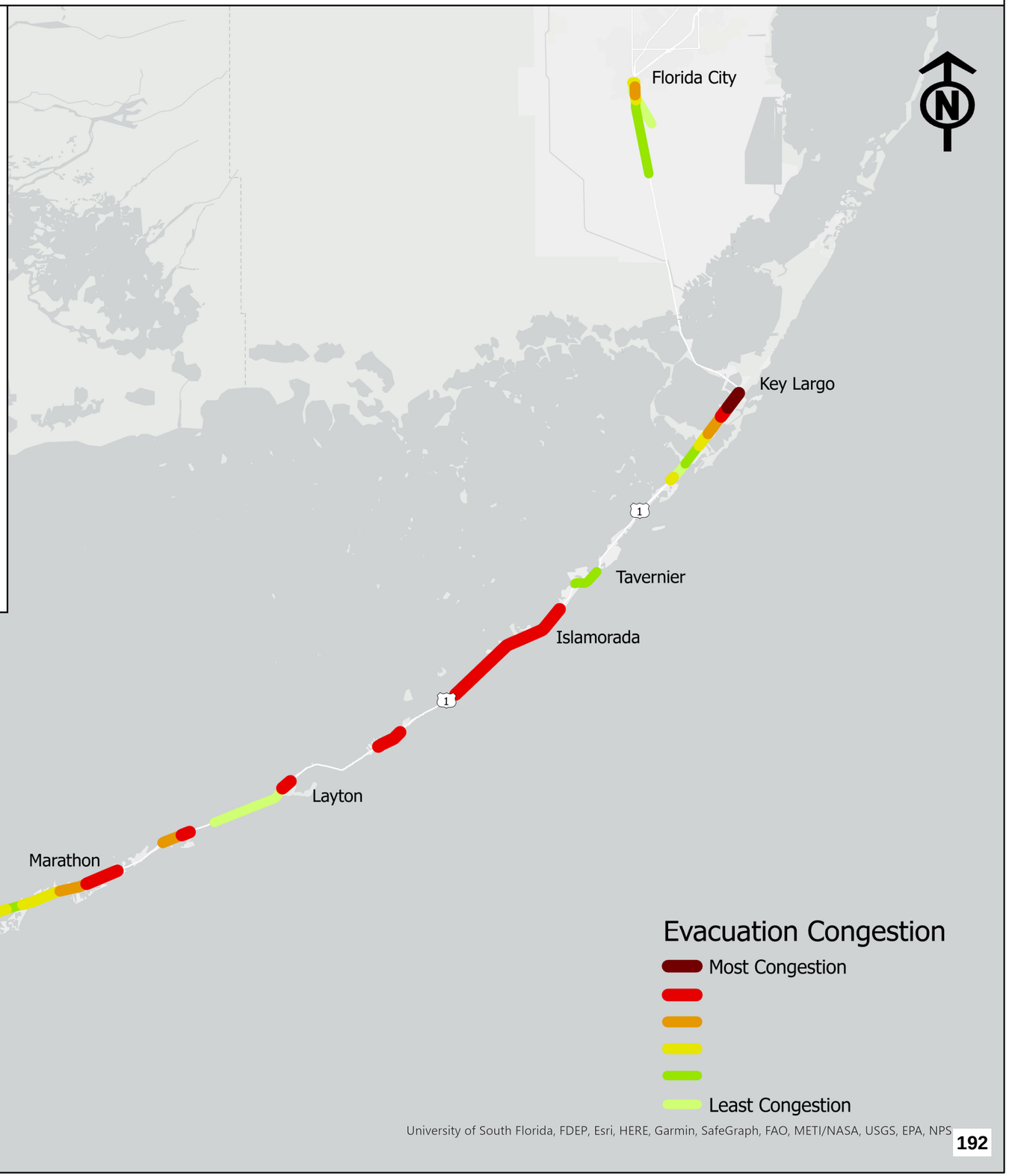
Scenario S4A-D: Allocation of 110 Units Based on Minimum 10 Year Allocation, Excludes Key West and Mobile Homes - Phase II



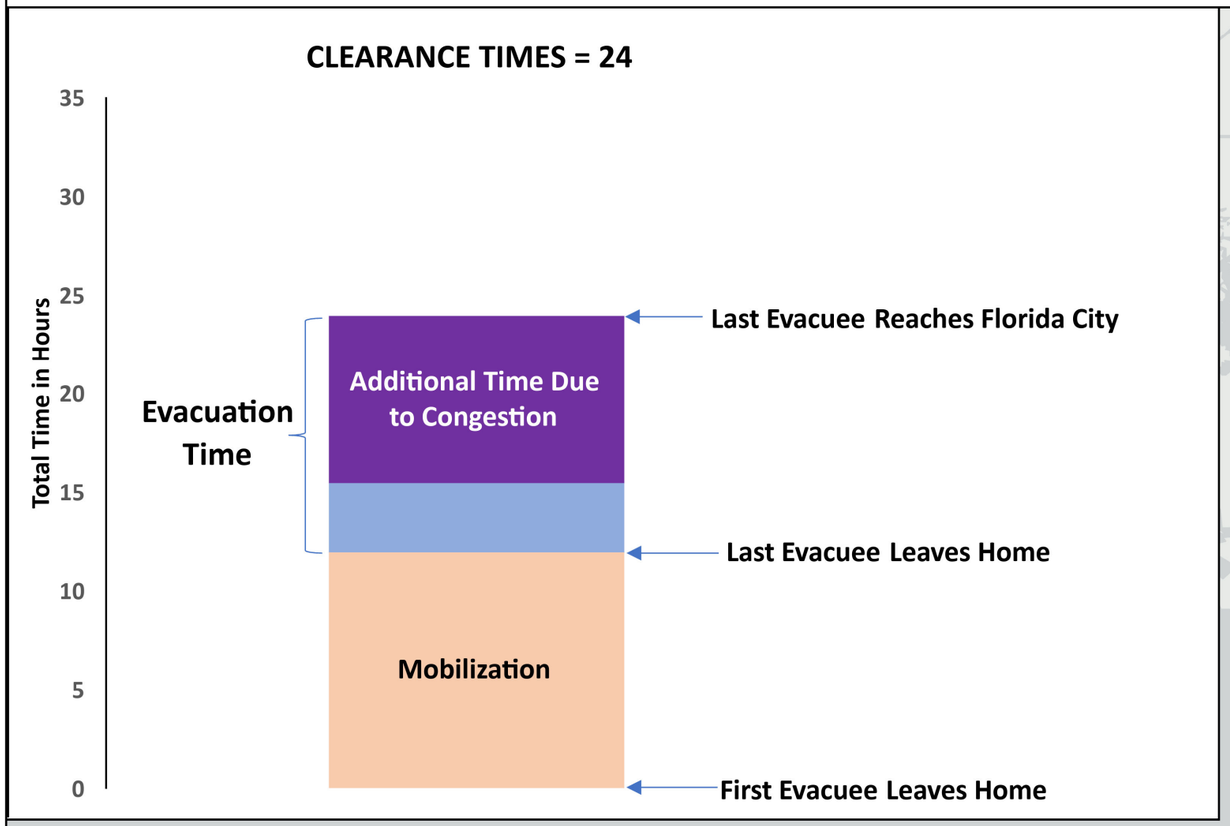


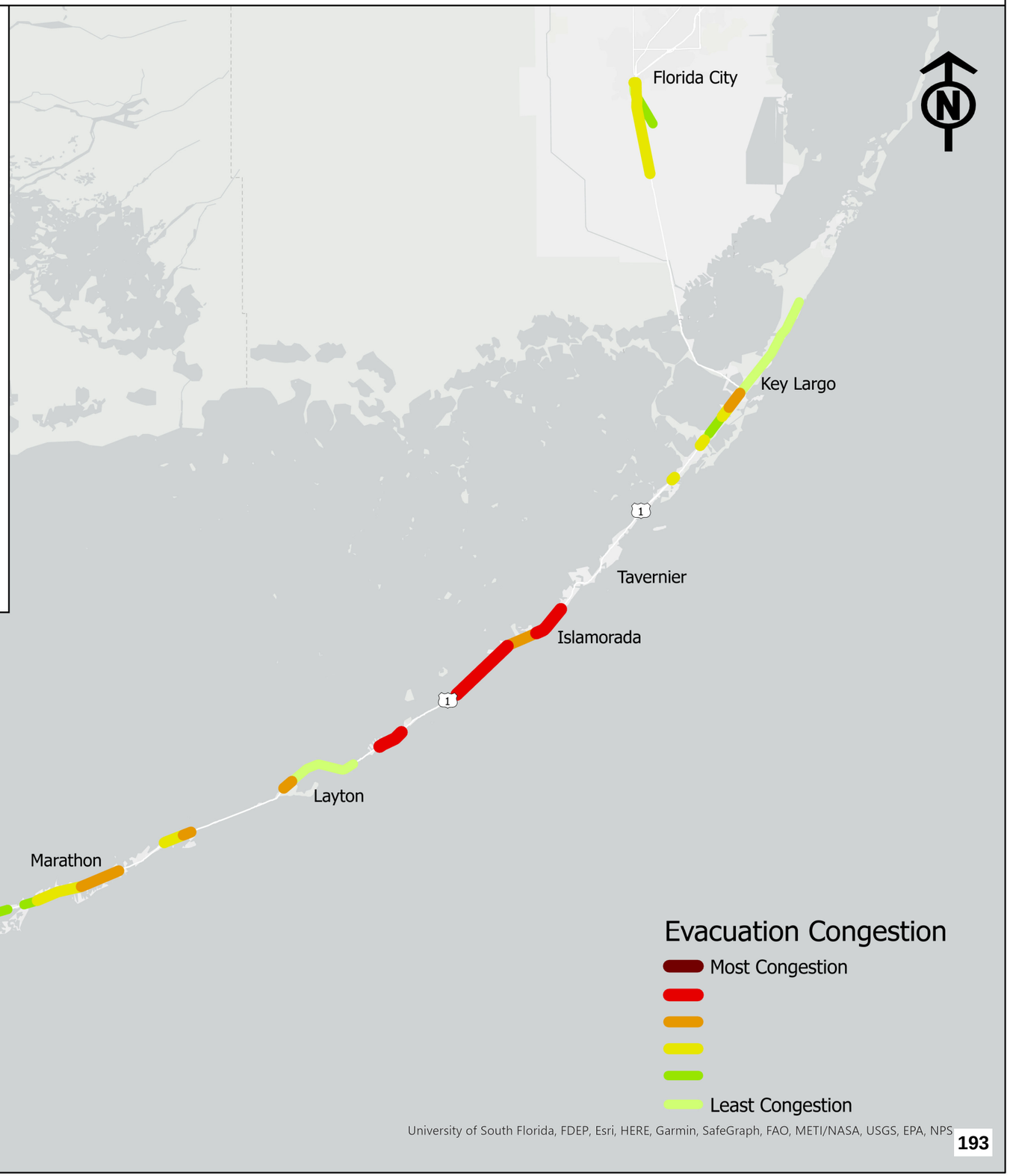
Scenario S4B-A: Allocation of 220 Units Based on Minimum 20 Year Allocation, Includes Key West and Mobile Homes - Phase II



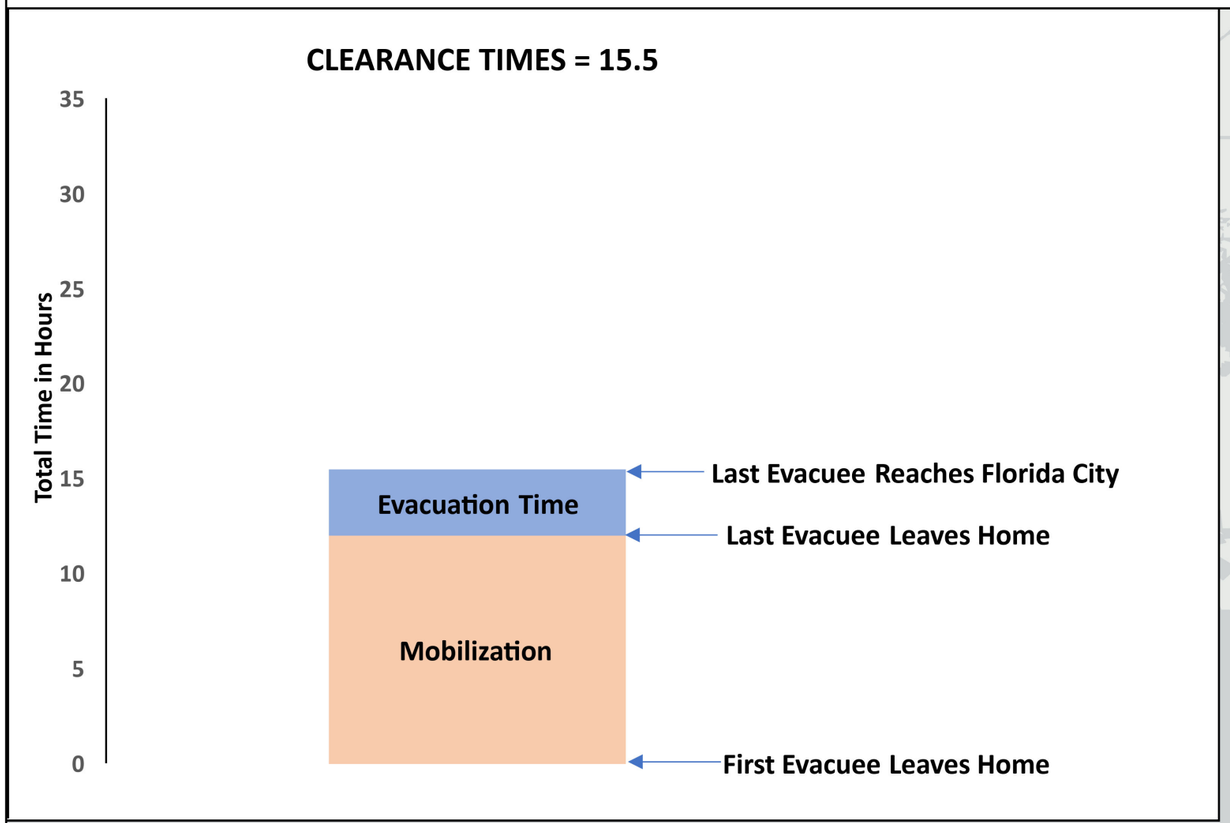


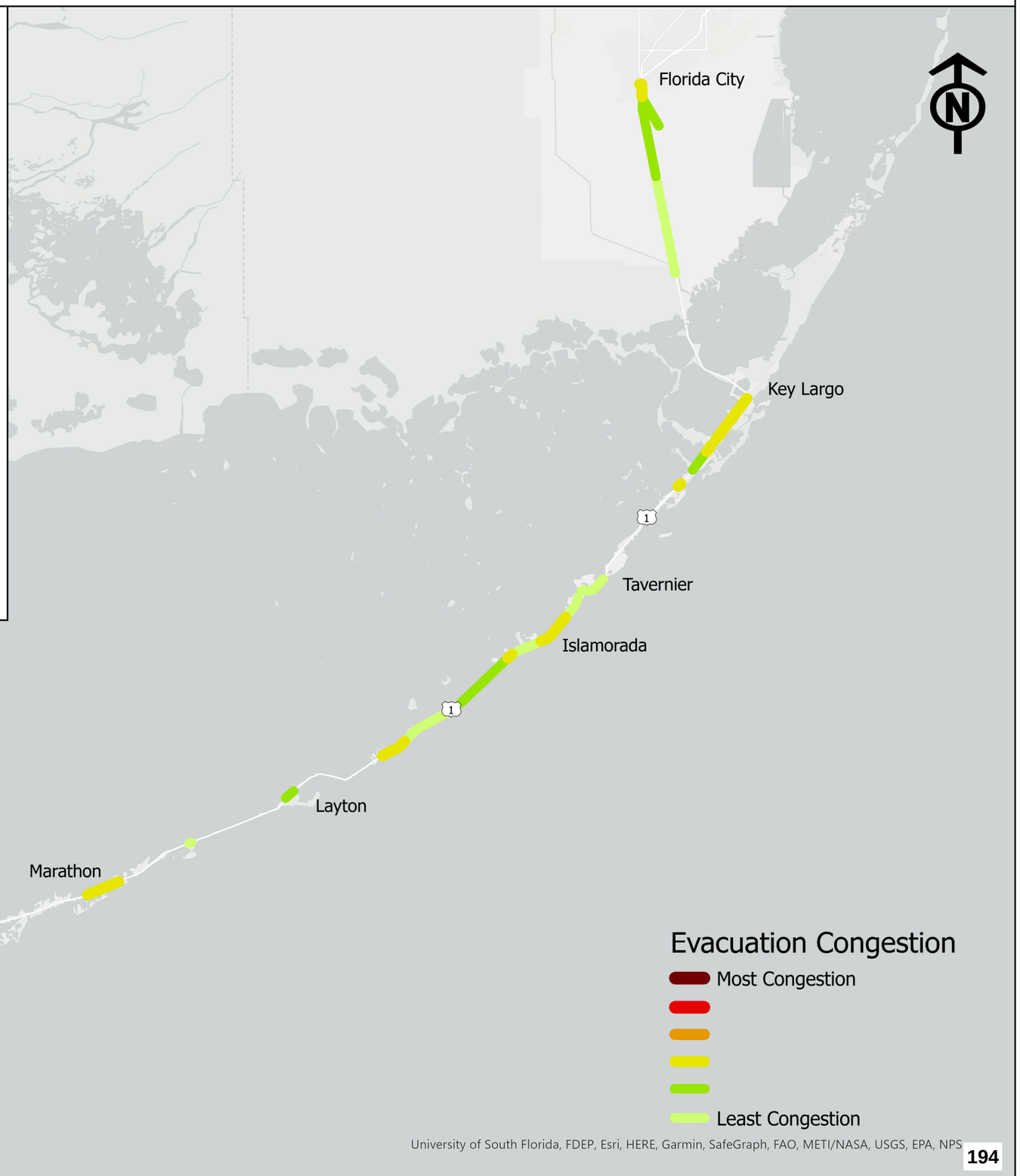
Scenario S4B-B: Allocation of 220 Units Based on Minimum 20 Year Allocation, Includes Key West and Excludes Mobile Homes - Phase II



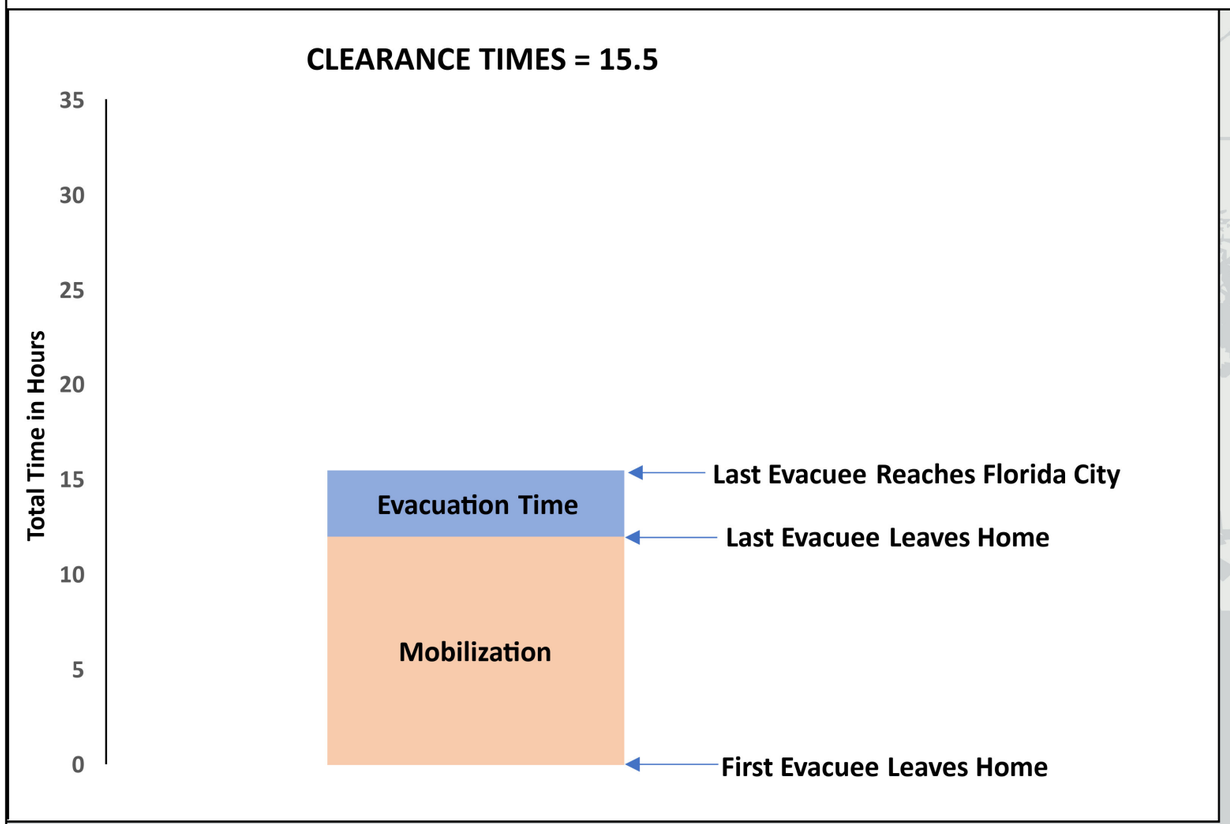


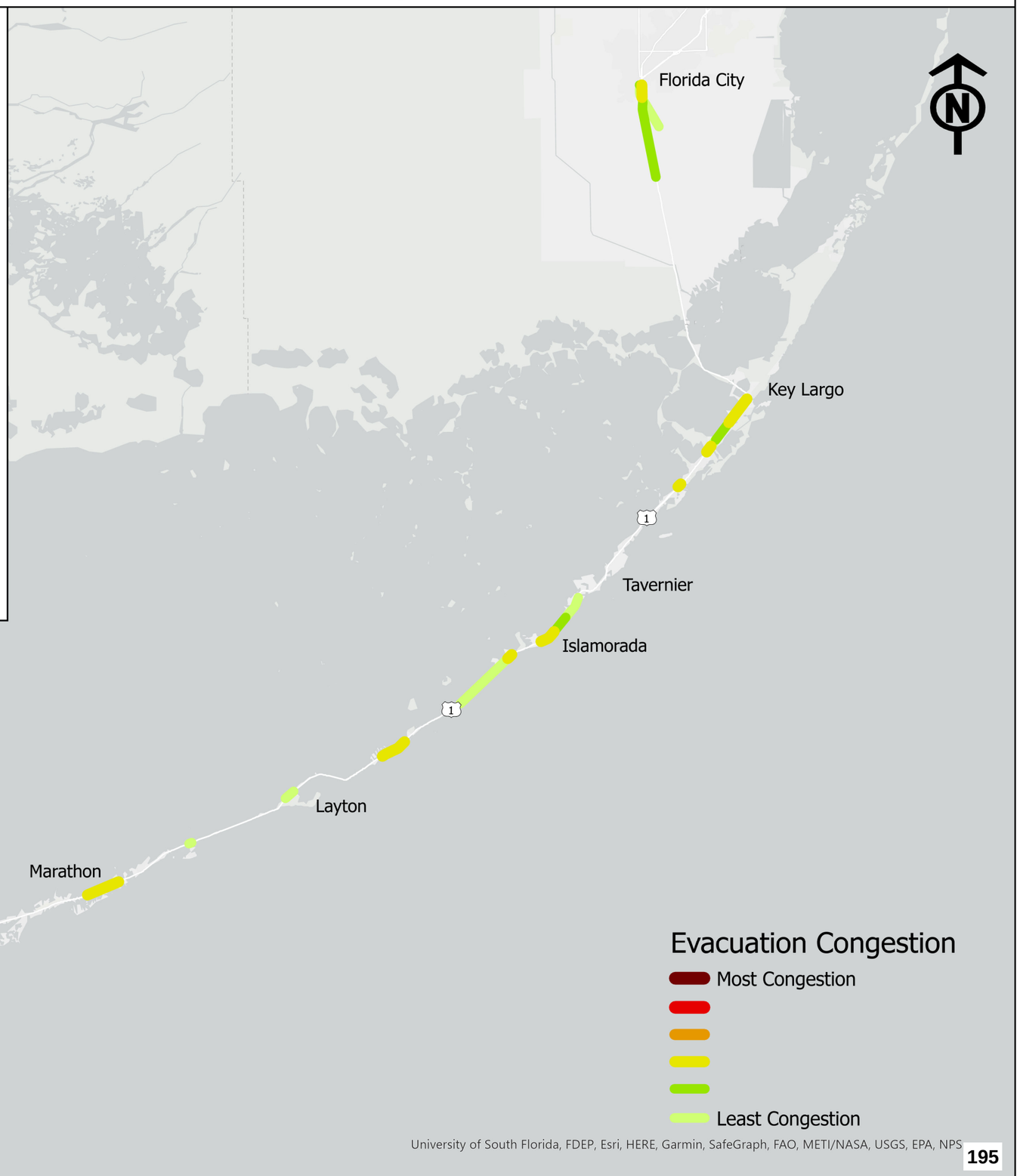
Scenario S4B-C: Allocation of 220 Units Based on Minimum 20 Year Allocation, Excludes Key West and Includes Mobile Homes - Phase II



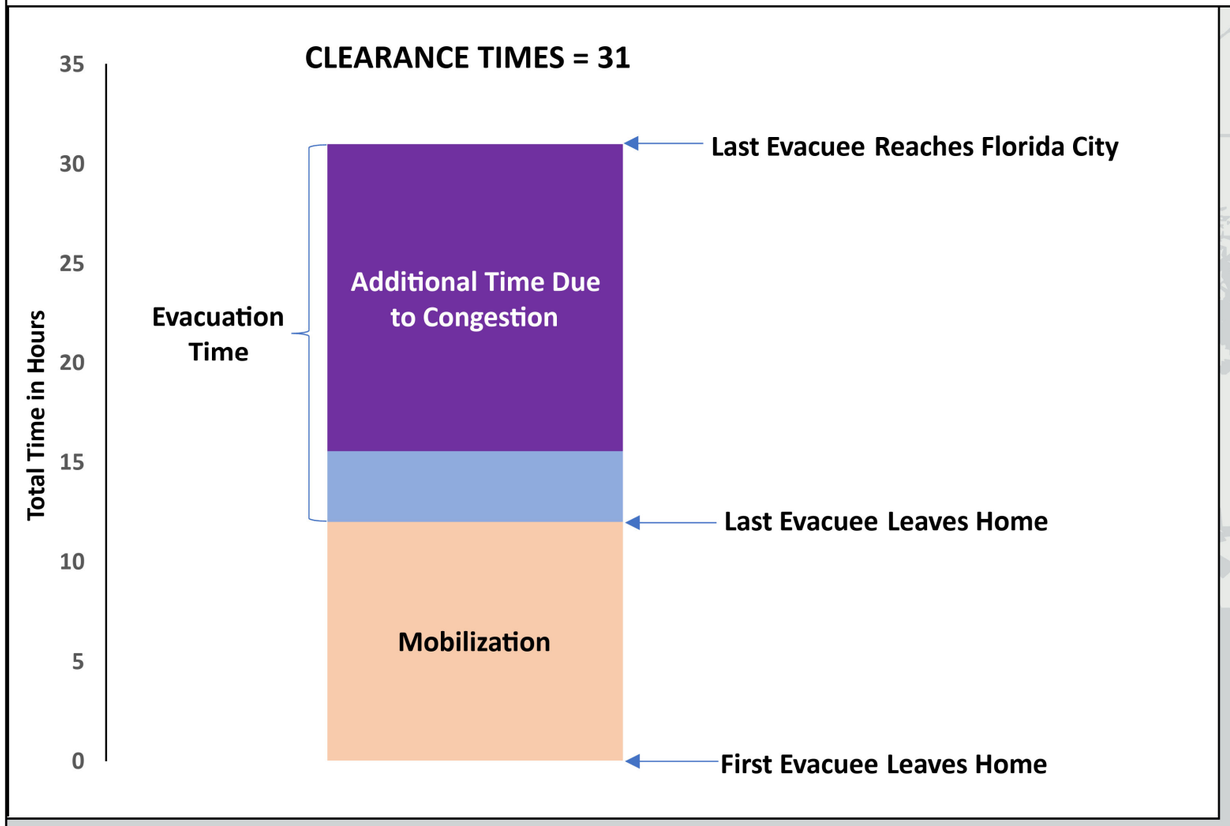


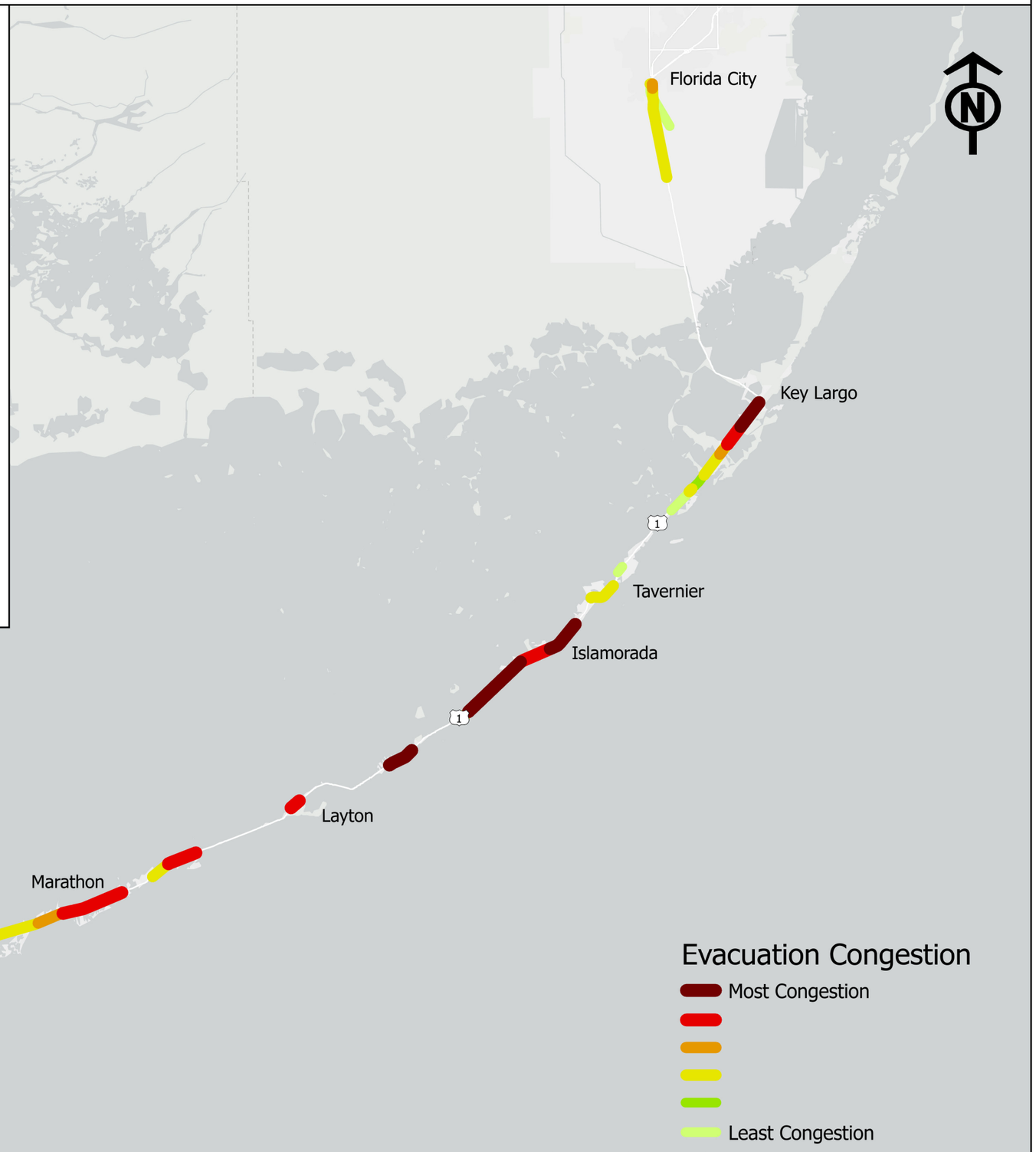
Scenario S4B-D: Allocation of 220 Units Based on Minimum 20 Year Allocation, Excludes Key West and Mobile Homes - Phase II





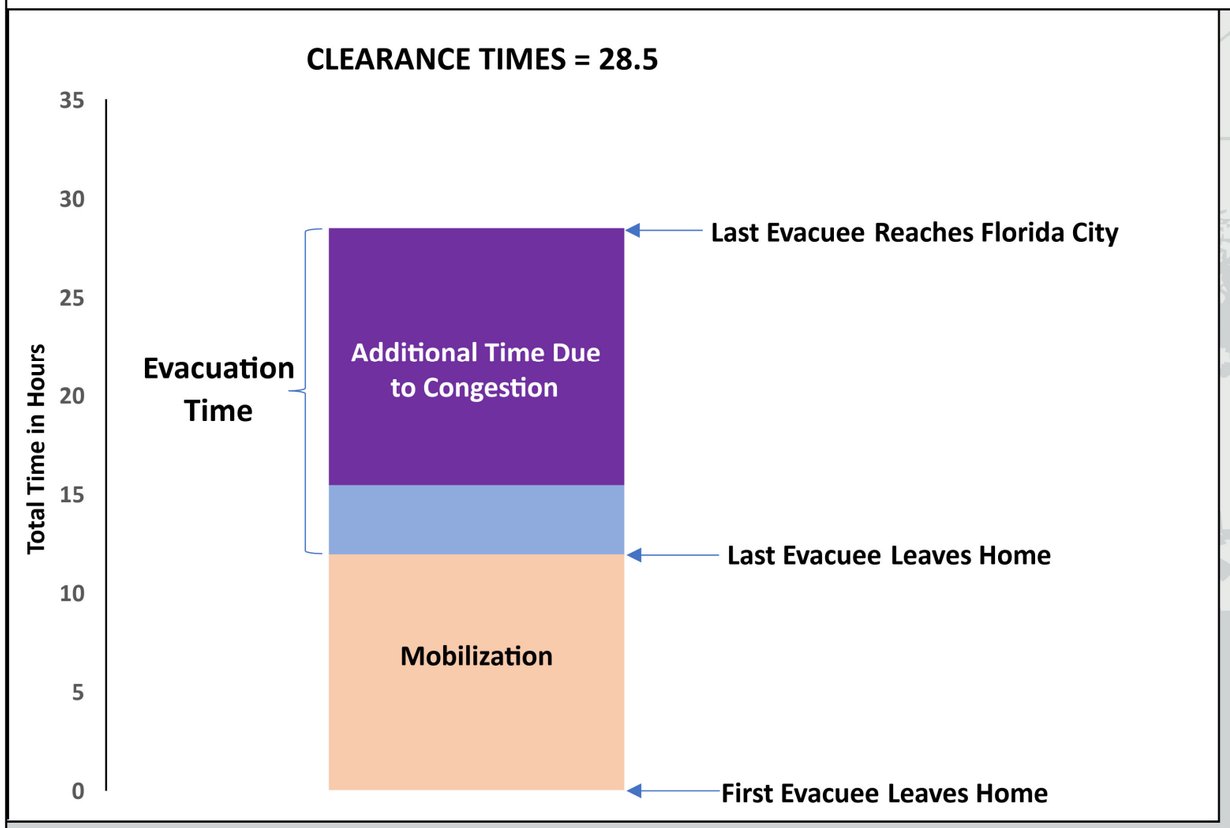
Scenario S5-A: Allocation of 7,954 Units Based on Available Land, Includes Key West and Mobile Homes - Phase II

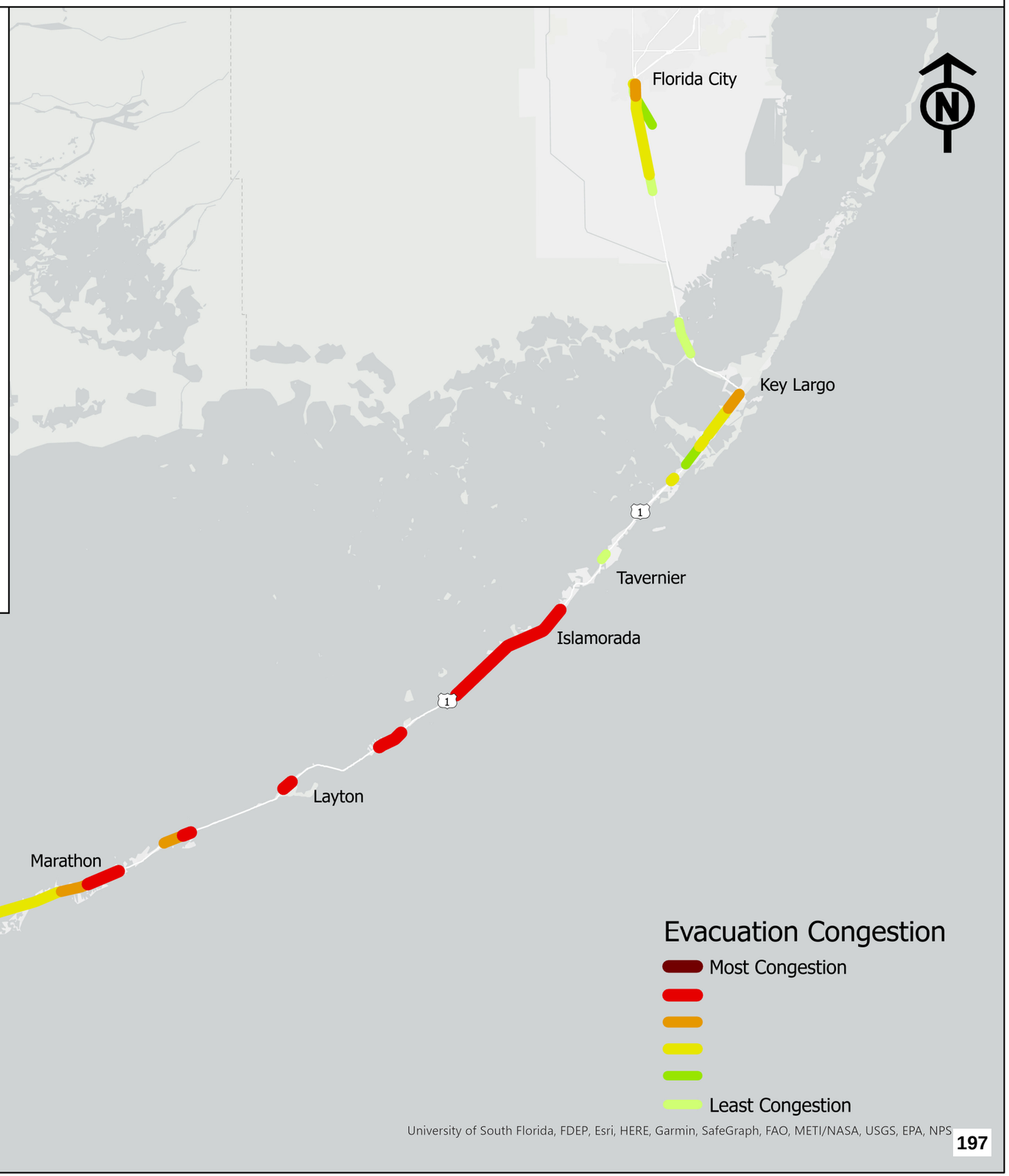




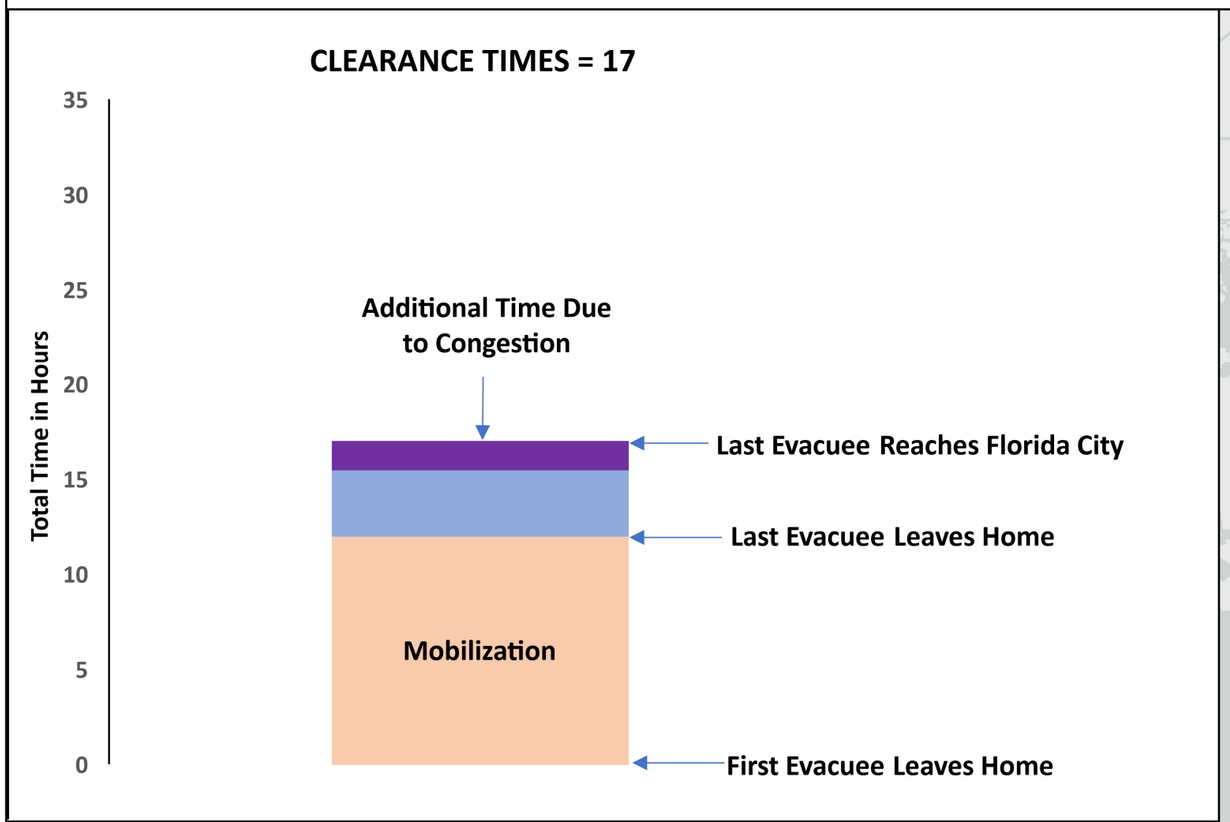
University of South Florida, FDEP, Esri, HERE, Garmin, SafeGraph, FAO, METI/NASA, USGS, EPA, NPS

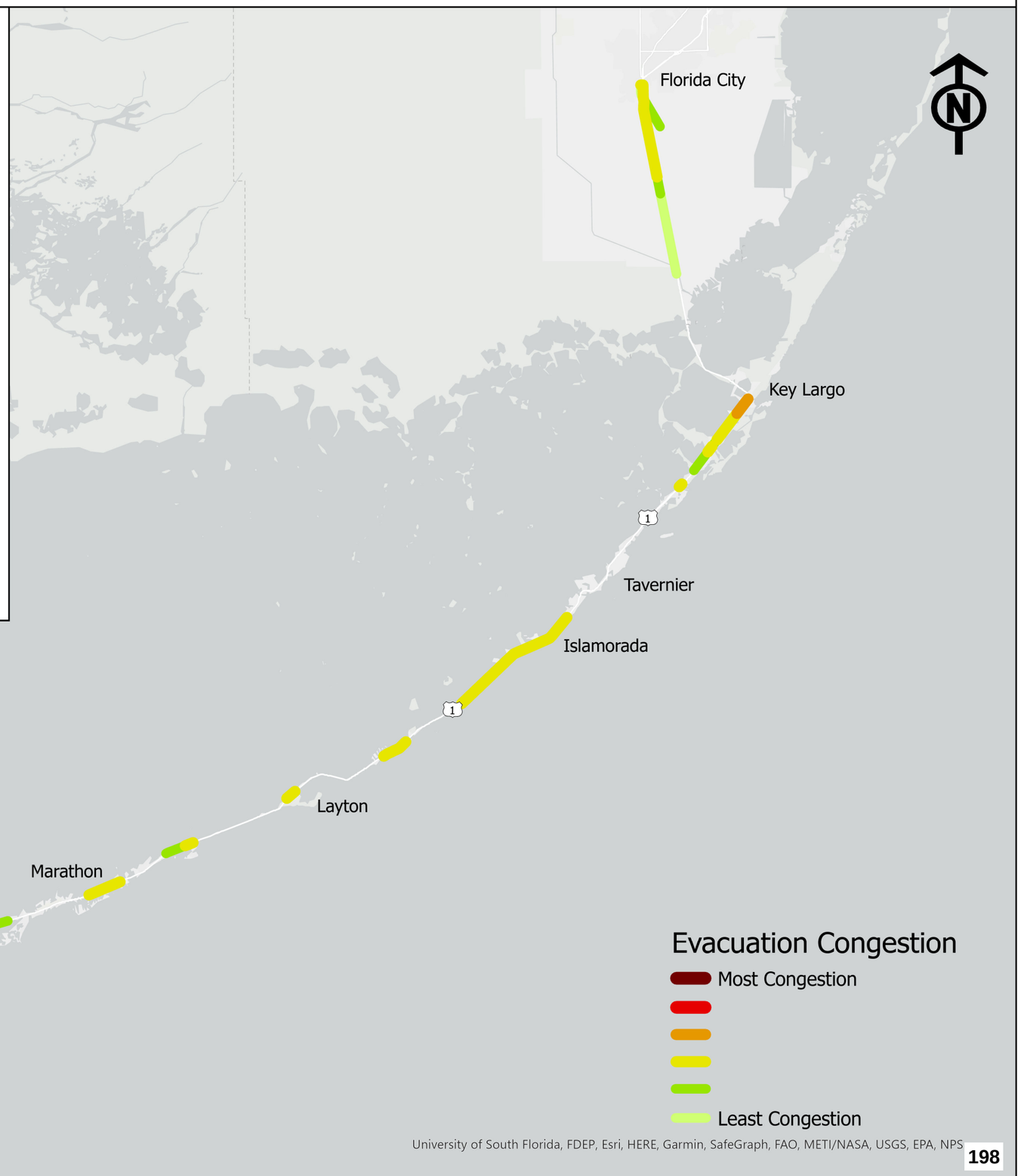
Scenario S5-B: Allocation of 7,954 Units Based on Available Land, Includes Key West and Excludes Mobile Homes - Phase II



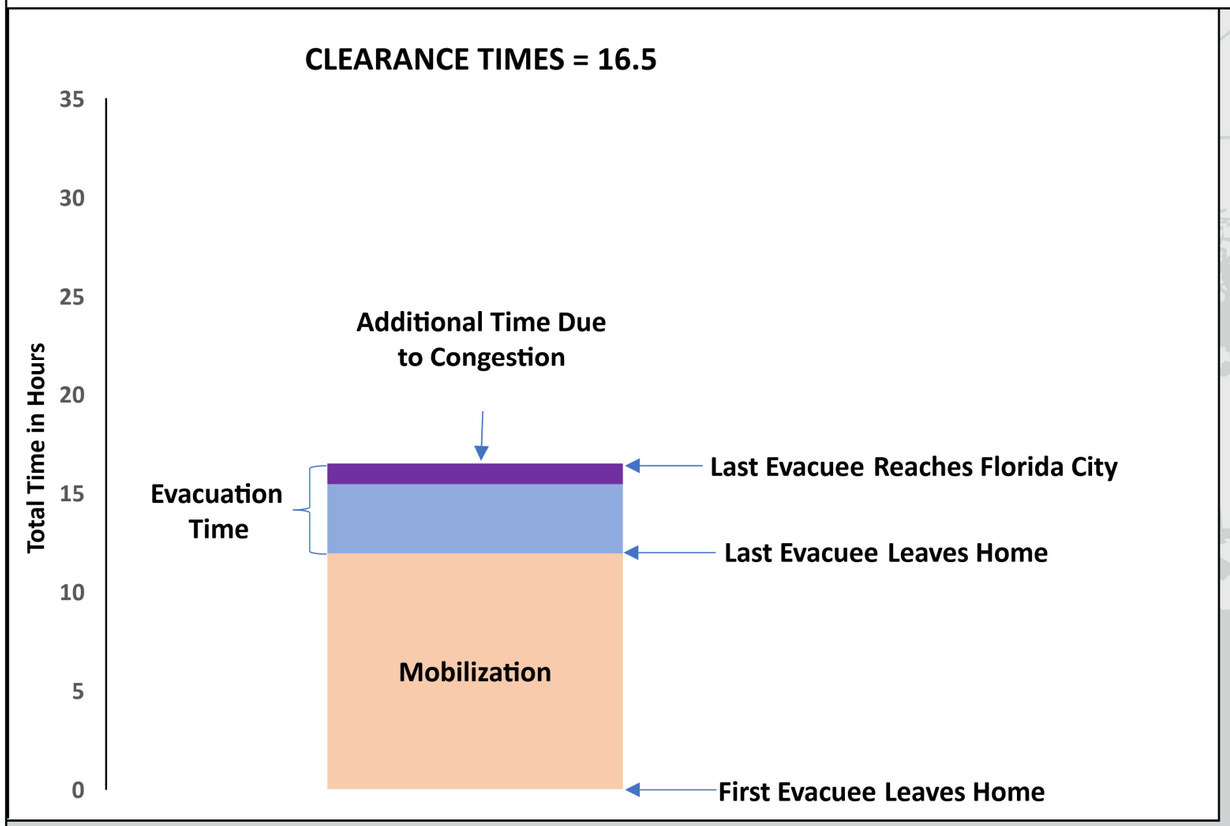


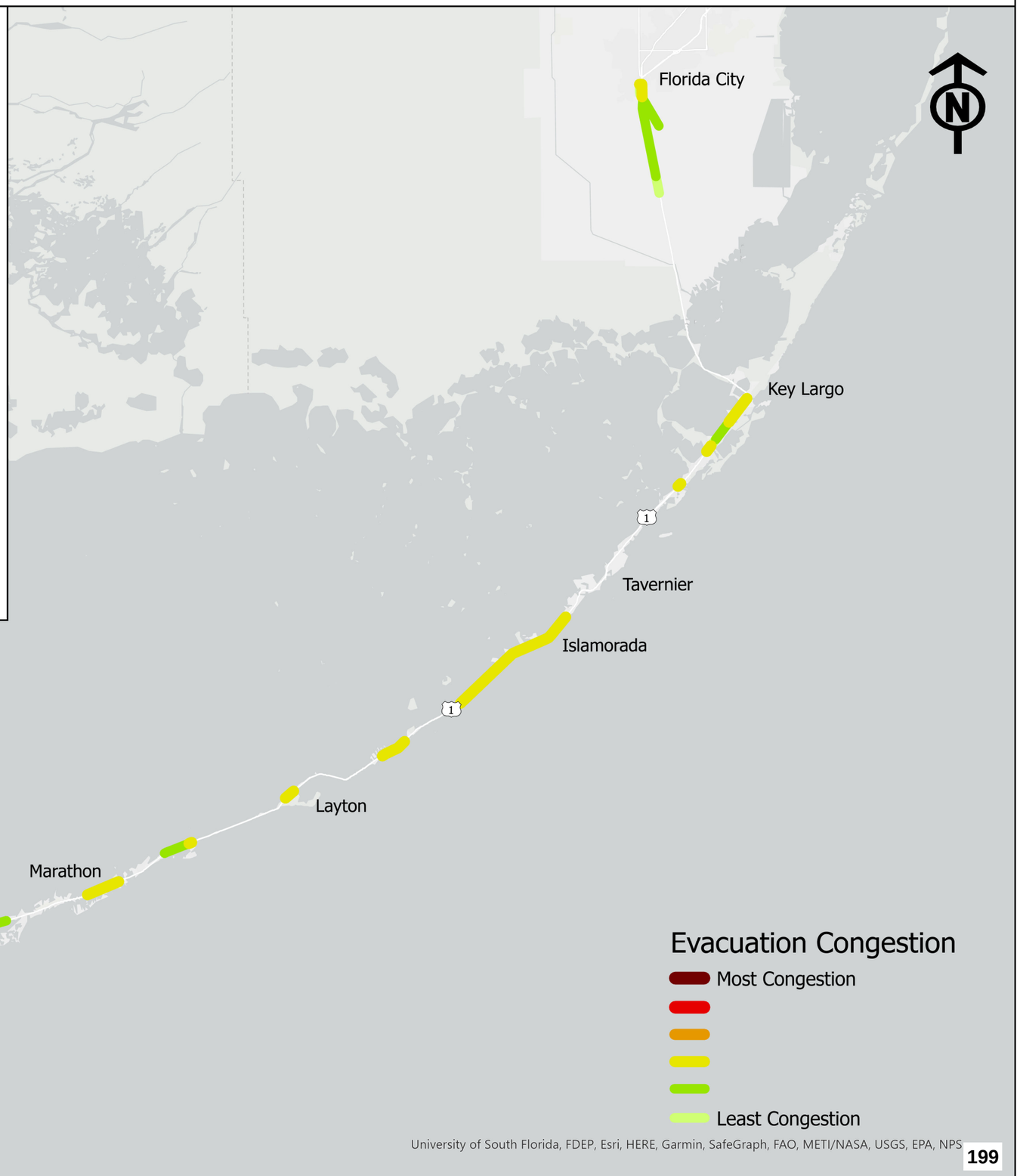
Scenario S5-C: Allocation of 7,954 Units Based on Available Land, Excludes Key West and Includes Mobile Homes - Phase II





Scenario S5-D: Allocation of 7,954 Units Based on Available Land, Excludes Key West and Mobile Homes - Phase II





June workshops

In June 2023, FloridaCommerce engaged in dialogues with local governments and stakeholders throughout the Keys, focused on gathering input on affordable housing needs and the pressures of development related to modeling the Florida Keys hurricane evacuation times. Additionally, FloridaCommerce hosted three televised public workshops on Hurricane Evacuation Modeling in Key West, Key Largo, and Marathon. This effort included the opportunity to speak at the workshops, as well as providing written comments in order to collect community feedback.

During these workshops, community members raised several issues, including: 1) the increasing number of vacation rental units, 2) the decrease in water supply capacity; 3) the deterioration of pump lines; and 4) exacerbating traffic conditions due to ongoing development. Following these Hurricane Evacuation Workshops, FloridaCommerce also received an influx of emails, reflecting concerns from the residents of the Florida Keys. The primary focus of these concerns revolved around the capacity and safety implications of further development in the area. Key issues highlighted were: 1) the inadequacy of infrastructure to support evacuation and manage traffic; 2) arguments that the area is already at full capacity; 3) apprehensions about potential changes to evacuation clearance times; and 4) the impacts of the proliferation of vacation rentals.

November Webinars

In November 2023 FloridaCommerce again engaged the public by holding two webinars to present the baseline models for assessing hurricane evacuation and the different evacuation scenarios that could be considered. Before and after the webinars conducted on November 14 and 16, FloridaCommerce received several emails that posed questions and expressed concerns regarding the modeling. These inquiries primarily centered around several issues: 1) the notable exclusion of Key West from the evacuation models despite it being subject to the same evacuation mandates as the rest of the Keys; 2) the absence of human behavioral data in the evacuation modeling, which raised questions about the lack of consideration for nocturnal evacuation behaviors and response times; 3) the rationale behind basing evacuation times solely on posted speed limits, which was called into question; and 4) the evident lack of modeling for simultaneous evacuations in emergency scenarios. Many of these questions were addressed at the conclusion of each webinar.

From: lindaweber@aol.com
To: FLKeysEvac
Subject: [EXTERNAL] - Building in the Keys
Date: Monday, November 20, 2023 6:07:29 AM

I don't support additional building permits for the keys. Traffic is horrible trying to leave the keys especially with an accident.
Our infrastructure is weak, and this would put additional strain on our roads, water, electricity, etc.

Linda Weber
104500 Overseas Hwy
Apt C202
Key Largo FL 33037

From: Dave Helwig
To: FLKeysEvac
Subject: [EXTERNAL] - FW: Keys Evacuation Model Comments
Date: Saturday, November 18, 2023 12:19:32 PM
Importance: High

Thank you for undertaking this professional analysis and the extensive public outreach program that has accompanied it. I was quite disappointed to read that the Monroe County commissioners have apparently decided to reject the study and rely on outdated information.

Recognizing that you are not involved in policy making, I will limit my comments to modeling methodology and assumptions:

> It does not appear that the modeling has accounted for the significant volume of daily commuter traffic which we experience. Census data does not account for the number of workforce members who travel to/from the Keys for their employment. There are substantial traffic jams each and every weekday morning and evening in Islamorada, Key Largo and on the Stretch. This traffic volume should certainly be accounted for and will only serve to add to congestion and extend evacuation times. If this consideration is not to be included in the analysis, that should at least be highlighted as a potentially significant limitation.
>
> While I do appreciate that the modeling was done using standard accepted methodology, it is only modeling. Efforts should be made to calibrate the model against actual experience. I expect that our actual experience on weekdays (mornings and evenings), around events (Nautical Flee Market) as well as weekends (Friday evening, Sunday afternoon) are the accurate portrayal of reality.

I am 17 year resident who lives at Mile Marker 90 and has the opportunity to experience these issues firsthand. I am also a retired registered professional engineer who has considerable experience with evacuation modeling in the licensing of nuclear power plants.

Thank you for the opportunity to provide comments.

David R. Helwig
156 Bougainvillea Street
Tavernier, FL 33070

Sent from Mail for Windows

From:	Dottie Moses
To:	FLKeysEvac
Cc:	Holly Raschein; David Rice; Lincoln-Michelle; Scholl-Jim; Cates-Craig; Roman Gastesi; Schemper-Emily
Subject:	[EXTERNAL] - Florida Keys Evacuation Modeling Webinar
Date:	Wednesday, November 15, 2023 6:06:48 PM
Attachments:	letter FloridaCommerce Hurricane Evacuation Workshop.docx

---

To FloridaCommerce Bureau of Community Planning and Growth,

Please accept the attached letter from the Island of Key Largo Federation of Homeowner Associations.

Dottie Moses, President

THE FEDERATION
ISLAND OF KEY LARGO FEDERATION OF HOMEOWNER ASSOCIATIONS, INC.

11-15-23

RE: Florida Keys Evacuation Modeling Webinar

Dear Department of Commerce,

Thank you for your presentation on Tuesday, Nov 14, 2023. We appreciate that you shared several modeling scenarios. It may be you were asked to include scenarios where Key West was not included in the evacuation modeling, however, as you mentioned, to ignore Key West is to ignore the most populous area in the Florida Keys**. Wasn't Key West included in the 2012 TIME model? And in the 2012 MOU? Why would it not be included in the 2023 TIME Model? Can you imagine a scenario when Key West would not evacuate when all of the rest of the Keys were ordered to?**

In your presentation, you state that the Roadway Capacity variable was provided by FDOT but it looks like Google Maps was used to provide the time it takes to get from Key West to Florida City (2 hours and 55 minutes). No one who travels on US 1 in the Keys would agree with that slide. Facts on the ground do not equate to travel on US 1 with no delays. Regardless of the current Board of County Commissioner's disappointing dismissal of the 2023 US 1 Arterial Travel Time and Delay Study, congestion on US1 is real and chronic. The Level of Service on US 1 has deteriorated, as the study revealed, and those of us who live here can attest to. **Why was that Google Map variable included and how was it used to evaluate the evacuation capacity or evacuation travel time of the road?**

We are confused as to why in 2013, FloridaCommerce "recommended" to the Administration Commission that 3,550 allocations be distributed over 10 years but in 2023 FloridaCommerce states it is not their role to recommend anything nor do they have the authority to do so. **What happened between 2013 and 2023 that took away your authority and power to recommend?**

As mentioned in the presentation, FloridaCommerce Hurricane Evacuation Modeling Goals include public safety, quality of life, and environmental protection. **Why wasn't quality of life or environmental protection considered in your presentation?**

You also mentioned there are other factors to be considered such as infrastructure, water, utilities, etc. if more allocations were to be issued. We couldn't agree with you more. As property owners in Monroe County, we are quite concerned about our failing infrastructure such as roads that flood, water pipelines that are in need of replacement, buried wastewater systems that are experiencing saltwater intrusion, and polluted nearshore waters. Many of our platted vacant lots are located in sensitive habitat areas with no infrastructure at all. **Have you considered what the environmental impact would be if all the**

vacant lots were suddenly buildable? If we struggle as a community now to address our existing infrastructure problems, how can we afford, financially and environmentally, to expand our buildable footprint? The quality of life in the Keys is sadly declining with traffic congestion, flooding streets, habitat loss, noise pollution, trash pollution, water pollution, dying coral reefs, and loss of native species. **Does the state no longer care about its Area of Critical State Concern?**

Since we are just now receiving this information, I hope we will have time to review and discuss it with our membership before any action is taken by the state.

Thank You very much for allowing us to submit questions and comments.

Dottie Moses, President
Island of Key Largo Federation of Homeowner Associations
P. O. Box 370702, Key Largo, FL 33037

ANGLERS PARK HOMEOWNERS ASSOC., BUTTONWOOD BAY HOMEOWNER'S ASSOC., CALUSA CAMPGROUND CONDOMINIUM ASSOC., HOMEOWNER'S ASSOC. OF CORAL COAST, HAMMER POINT HOMEOWNER'S ASSOC., HIBISCUS PARK HOMEOWNER'S ASSOC., PIRATE'S COVE PROPERTY HOMEOWNERS ASSOC. PORT LARGO RESIDENTIAL HOMEOWNER'S ASSOC., ROCK HARBOR CLUB CONDOMINIUM ASSOC., ROCK HARBOR ESTATES HOMEOWNER'S ASSOC., SEXTON COVE HOMEOWNER'S ASSOC., SILVER SHORES LEASEHOLDERS ASSOC., STILLWRIGHT PROPERTY OWNER'S ASSOC., SUNSET WATERWAYS HOMEOWNER'S ASSOC., TAMARIND BAY CONDOMINIUM ASSOC., TAYLOR CREEK VILLAGE HOMEOWNER'S ASSOC., THE HARBORAGE HOMEOWNER'S ASSOC., THE SANCTUARY CONDOMINIUM ASSOC., WYNKEN BLYNKEN & NOD HOMEOWNER'S ASSOC.

From:	richard grosso
To:	FLKeysEvac; richardgrosso1979
Subject:	[EXTERNAL] - Follow up Questions for the Nov 16 Working Group webinar
Date:	Wednesday, November 15, 2023 11:16:53 AM
Attachments:	Follow-up questions for 11.16.23 Webinar.pdf

Hello

Please see the attached questions that I would ask the Department to answer during tomorrow's Webinar

Thank you for the opportunity to participate in this process.

RG

Richard Grosso, Esq.
Richard Grosso, P.A.
6919 W. Broward Blvd.
Plantation, FL 33317
Mailbox 142

richardgrosso1979@gmail.com
954-801-5662

richardgrossopa.com

Richard Grosso, Esq.
Richard Grosso, P.A.
6919 W. Broward Blvd.
Plantation, FL 33317
Mailbox 142
richardgrosso1979@gmail.com
954-801-5662
richardgrossopa.com

Sent via email to: FLKeysEvac@Commerce.fl.us

Meredith Ivey, Deputy Secretary, Fla. Dept of Commerce

Dear Deputy Secretary Ivey,

I appreciated the opportunity learn more about the Fla Keys Hurricane Evacuation Working Group process and new evacuation model runs during yesterday's webinar. This issue is of particular importance to me, as I was directly involved in the development of the evacuation - based "ROGO" system and its refinements, and was counsel of record in the recent administrative challenge and appellate decision that ruled that the 1,300 unit ROGO increase violated the statutory 24 – hour evacuation limit. As you know, that judicial ruling was effectively overturned by the Legislature last session, with the adoption of a law authorizing those 1,300 ROGO units as an exception to the 24 - hour limitation.

This history and experience, coupled with the information revealed during yesterday's webinar, raise the following crucial questions that I would ask be specifically answered during tomorrow's webinar. Those questions are:

1. Since, the Administration Commission voted to allowed 1,300 units to the Keys in 2018 despite the fact that the "build-out" determined by the last (2013) Working Group process had already been exceeded, **why should the public have any confidence that the results of this current update will matter? Why should the public not expect that the development limits that result from this update will simply be lifted or waived later when development approvals begin to approach those limits?**

2. **Your emphasis of the point that DOC has no authority over the number of development allocations and can only submit the Working Group's findings to the Governor and Cabinet for that body to consider in determining the appropriate rate of growth begs the question of the basis upon which that body will make such a decision. It should be assumed that the Administration Commission will seek the Department's expert guidance on the validity/ reality of certain assumptions underlying each model run. Would the Department not answer those questions? Does it not have opinions now based on the work to date? Several of the question I here would seem likely points of discussion for which the Commission members themselves**

would require expert guidance from the agency, and we think it important to know the Department's views on those issues.

3. Currently, Florida law limits development in the Keys to that which can be evacuated within 24 hours plus the 1300 ROGO units allocated by the Legislature earlier this year. Would the Department support or oppose legislation to increase that current development limit? **If it is the Department's position that it lacks the authority to make this determination, what opinion, statement or recommendation would it make to the Administration Commission on this question?**

4. **How does the Florida Keys' Carrying Capacity Study factor into the Department's recommendation or submittal of information to the Administration Commission. When the former DEO recommended to the Cabinet the approval of the 1,300 new ROGO units, there was no mention of the Carrying Capacity Study, and it seemed the Department acquiesced in the position of the local governments that the Study had no remaining relevance to decisions about the amount or rate of new development in the Keys. Is that the Department's position at this point? If it is the Department's position that it lacks the authority to make this determination, what opinion, statement or recommendation would it make to the Administration Commission on this question?**

5. **What is the expected reality concerning whether evacuating vehicles will be on US 1 in Florida City when evacuees from the Keys arrive there? Does the Department believe it would be professionally acceptable and appropriate to based development decisions on a model run that assumes there are no other evacuating vehicles on US 1 in Florida City when Keys evacuees arrive there on their way to shelter? If it is the Department's position that it lacks the authority to make this determination, what opinion, statement or recommendation would it make to the Administration Commission on this question?**

6. **Is there a valid basis in current scientific and emergency management data and analysis to make development allocation decisions based on an assumption that an evacuation clearance time greater than 24 hours is adequate to protect public safety? If it is the Department's position that it lacks the authority to make this determination, what opinion, statement or recommendation would it make to the Administration Commission on this question?**

7. **Specifically, how is the latest data, information and observations about the rapid intensifications of hurricanes being factored into the decision about the evacuation time that should be the basis of development allocations. If it is the Department's position that it lacks the authority to make this determination, what opinion, statement or recommendation would it make to the Administration Commission on this question?**

8. **For each of the questions I have raised above, what information and opinions has the Department solicited and received from the national Hurricane Center and related federal agencies on these questions?**

9. **Given your very appropriate recognition that the residents and tourists in Key West are, in reality, a major portion of the evacuating public, shouldn't it be a complete non-starter to even consider the approval of any development scenario based on a model run that excludes Key West.**

10. **Is the Department prepared to recommend that the Florida Legislature clarify or change Florida law to make clear that the 24 – hour evacuation standard (or any different standard that might emerge from this Working Group process) applies to Key West along with all other local jurisdictions in the Keys.**

11. **How is the Working Group process factoring into its model runs the substantial rise of the use of otherwise "vacant" homesites as short term / vacation rentals on vacancy rate assumptions?**

I thank you for your consideration of these questions, which I believe go to the fundamental validity of the Working Group process.

From: Dottie Moses
To: FLKeysEvac
Subject: [EXTERNAL] - Fw: Road Closures and Safety Advisory for Ocean Reef Chamber Members
Date: Thursday, November 16, 2023 9:26:51 AM

Sent from AT&T Yahoo Mail on Android

----- Forwarded Message -----
From: "Ocean Reef Chamber of Commerce" <director@oceanreefchamber.org>
To: "dpmoses@bellsouth.net" <dpmoses@bellsouth.net>
Sent: Thu, Nov 16, 2023 at 9:15 AM
Subject: Road Closures and Safety Advisory for Ocean Reef Chamber Members

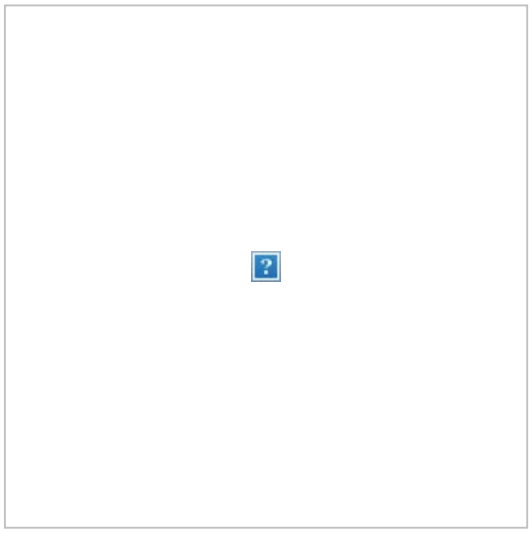
Road Closures and Safety Advisory

Cardsound Road is currently closed, and heavy debris has been reported on Route 905 and the stretch of US1 leading into and out of Key Largo.

Please be advised:
Employees driving into work should exercise extreme caution and expect delays due to the challenging road conditions.

We will continue to provide updates as needed.

Subscribe to the Ocean Reef Chamber of Commerce Newsletter



Ocean Reef Chamber of Commerce | 1 Dockside Lane, Key Largo, FL 33037

Unsubscribe dpmoses@bellsouth.net

Update Profile | Constant Contact Data Notice

Sent by director@oceanreefchamber.org powered by



Try email marketing for free today!

From: Ann Olsen
To: FLKeysEvac
Subject: [EXTERNAL] - Questions for Nov 16 Evacuation Modeling Meeting
Date: Wednesday, November 15, 2023 3:51:43 PM

Dear Ms. Ivey,

I hope you will reply to these questions at tomorrow's 2pm meeting. I look forward to your response.

1. Your presentation placed significant emphasis on the fact that you would simply pass the modeling along to the Governor and cabinet and local decision makers. How can the public expect an informed decision made by people 640 miles away who may only see this presentation with no Carrying Capacity study, no report on Key's infrastructure such as roads, bridges, our aged and impaired drinking water pipe, while only hearing the lobbying that comes from developers' intent upon more building, and not public safety or quality of life for the residents? What data will be provided to lawmakers?

2. How can any model be created, much less published, that excludes Key West, when Key West is clearly a part of the Keys and under the same 24-hour evacuation mandate?
    - Even if Key West's 24-hour evacuation mandate falls under Florida Administrative Code, Chapters 28-36, while the rest of the Keys fall under Florida Statute 380.05 – they say the same thing – ALL must evacuate in 24 hours.
    - Further, there is a Memorandum of Understanding that all local governments must coordinate their evacuation response.

3. Why is there no Human Behavioral data included in the modeling or even noted in the analysis?
    - For example, there is well documented research that shows people do not evacuate at night, yet the Modeling always uses a 24-hour per day flow of traffic.
    - The Modeling reflects a 12-hour Response Curve, yet does not vary the Response or Response Time dependent on the hour the Evacuation is given (if Evacuation is called at 11pm at night, most people wouldn't even be aware of it until 7-8am the next day and 8-9 of the 12 hours is already depleted).

4. How can Evacuation Times be based solely on posted Speed Limits? It is impossible to travel from Key West to Florida City in 2 hours 55 minutes.
    - Further, the Model assumes all Phase 1 Evacuees have cleared the roads before Phase 2 begins, but provides no modeling in the case of a Rapidly Intensifying Hurricane when everyone leaves at once. Why is this not addressed?

5. No actual data was provided, just analysis. What went into these numbers?
    - **How can the Evacuation Time have DECREASED from 26.5* hours for Phase 2/Permanent Residents in the 2012 modeling to 26 hours in the current model, BEFORE 3,550 building allocations were distributed and the population increased over the past decade?** *(Corrected baseline after error was found in the analysis.)
        - 2012 census data did not include people if they weren't in their homes on April 1st. This ignores the proliferation of Vacation Rentals. Why aren't a greater number of residents counted?
        - Population vs Vehicle Demographics:
            - 34,456 vehicles vs 68,165 residents (1 vehicle per household evacuating?)
            - ALL families are leaving in one car and leaving their second car to flood?
        - The Tourist Numbers seem insanely low. Lobster Season may have 3-10 cars per household, plus all will be towing boats. Illegal housing is not mentioned. All numbers err toward the minimum possible scenario.

6. If the top 3 Goals are Public Safety, Quality of Life, and Environmental Protection, why were none of these issues mentioned in the Analysis?

Thank you,

Ann Olsen
President, Last Stand

signature_1082675173

From: wayne_kate@att.net
To: FLKeysEvac
Subject: [EXTERNAL] - Questions re: Evacuation Models
Date: Wednesday, November 15, 2023 12:11:57 PM
Attachments: Evacuation Models.docx

Please see the attached questions regarding the evacuation models you presented yesterday.

Thank you,

Wayne Jessup and Kate Edgerton
29135 Orchid Lane
Big Pine Key, FL 33043

From:	Schemper-Emily
To:	FLKeysEvac
Cc:	Gastesi-Roman; Shillinger-Bob; Wilson-Kevin; Tennyson-Lisa; Ballard-Lindsey; Morris-Peter
Subject:	[EXTERNAL] - Questions regarding draft results of the 2023 Florida Keys Hurricane Evacuation Modeling for the Florida Keys
Date:	Wednesday, November 15, 2023 5:09:56 PM

As follow-up to FL Commerce's November 14 webinar to review the draft results of the 2023 Florida Keys Hurricane Evacuation Modeling for the Florida Keys, Monroe County has several questions, which we hope can be addressed during the November 16 webinar:

1. Are the six scenarios presented (Baseline, and S1 – S5 under "Deliverable 6: Prospective Modeling for Future Allocations") the only modeling scenarios available to us for review, or can we request additional modeling of scenarios with adjusted future allocation distribution proposals?

2. Is there an assumed distribution period of 10 years for allocations in scenarios S1, S2, S3, and S5?

3. What is the basis for running the model with Mobile Homes in Phase 2 rather than just in Phase 1 which is the normal evacuation procedure?

4. Why has the model been run with an option to exclude Key West from evacuation time calculations?

5. What is FL Commerce's anticipated timeline for local comment? By when are you requesting final recommendations from local stakeholders and what is the process for State approval/decision?

6. Do you intend for each local government (County, Marathon, Islamorada, Layton, Key Colony Beach, Key West) to provide an individual recommendation, or are you requesting one unified recommendation from the County as a whole?

We look forward to your feedback.
Thank you,

****

Emily Schemper, AICP, CFM
Senior Director of Planning & Environmental Resources
Monroe County | Planning & Environmental Resources Department
2798 Overseas Highway, Suite 400, Marathon, FL 33050
305.453.8772

****

From: J. Matthew Massoud
To: FLKeysEvac
Subject: [EXTERNAL] - shifting population to phase 1
Date: Tuesday, November 14, 2023 3:58:38 PM

I enjoyed today's presentation. Thank you for putting it together for us. It looks as though even with Mobile Homes included in Phase 1, there is still a significant amount of time to evacuate in accordance with the regulations. Can the evacuation time be mitigated by expanding the population that must evacuate during Phase 1? Say, for instance, certain neighborhoods, individual keys, housing types, or flood risk zones?

V/r,
J.M. Massoud (thou/thee)
KN4SSZ

From: Garcia-Jennifer
To: FLKeysEvac
Subject: [EXTERNAL] - Slides from today's Presentation
Date: Tuesday, November 14, 2023 4:32:30 PM
Attachments: image001.png

Good afternoon,
Could you please send the slides from the Hurricane Evacuation Modeling?
Lincoln-michelle@monroecounty-fl.gov
garcia-jennifer@monroecounty-fl.gov

Jennifer Garcia, Executive Assistant
Commissioner Michelle Lincoln BOCC District 2 (Stop #10B)
243 Key Deer Blvd
Big Pine, FL 33043
Office phone- 305-292-4512
Cell phone- 305-783-8043

PLEASE NOTE: FLORIDA HAS A VERY BROAD RECORDS LAW. MOST WRITTEN COMMUNICATIONS TO OR FROM THE COUNTY REGARDING COUNTY BUSINESS ARE PUBLIC RECORDS AVAILABLE TO THE PUBLIC AND MEDIA UPON REQUEST.

From:	Garcia-Jennifer
To:	FLKeysEvac
Subject:	RE: [EXTERNAL] - Slides from today's Presentation
Date:	Thursday, November 16, 2023 10:43:40 AM
Attachments:	image003.png image009.png image010.png image011.png

---

Thank you so much!

Jennifer Garcia, Executive Assistant
Commissioner Michelle Lincoln BOCC District 2 (Stop #10B)
243 Key Deer Blvd
Big Pine, FL 33043
Office phone- 305-292-4512
Cell phone- 305-783-8043

PLEASE NOTE: FLORIDA HAS A VERY BROAD RECORDS LAW. MOST WRITTEN COMMUNICATIONS TO OR FROM THE COUNTY REGARDING COUNTY BUSINESS ARE PUBLIC RECORDS AVAILABLE TO THE PUBLIC AND MEDIA UPON REQUEST.

From: FLKeysEvac <FLKeysEvac@commerce.fl.gov>
Sent: Wednesday, November 15, 2023 5:23 PM
To: Garcia-Jennifer <Garcia-Jennifer@MonroeCounty-FL.Gov>
Subject: RE: [EXTERNAL] - Slides from today's Presentation

...

CAUTION: This email originated from outside of the County. Whether you know the sender or not, do not click links or open attachments you were not expecting.

Good Afternoon,

The slide deck and recording of the Florida Keys Hurricane Evacuation Modeling webinar have been made available at www.floridajobs.org/FLKeysEvac.

Paul Lim, FCCM
Coastal Resiliency Planner – Southeast Region, Division of Community Development

FloridaCommerce
Office: 850.717.8511
www.FloridaJobs.org

From: Garcia-Jennifer <Garcia-Jennifer@MonroeCounty-FL.Gov>
Sent: Tuesday, November 14, 2023 4:32 PM
To: FLKeysEvac <flkeysevac@commerce.fl.gov>
Subject: [EXTERNAL] - Slides from today's Presentation

Good afternoon,
Could you please send the slides from the Hurricane Evacuation Modeling?
Lincoln-michelle@monroecounty-fl.gov
garcia-jennifer@monroecounty-fl.gov

Jennifer Garcia, Executive Assistant
Commissioner Michelle Lincoln BOCC District 2 (Stop #10B)
243 Key Deer Blvd
Big Pine, FL 33043
Office phone- 305-292-4512
Cell phone- 305-783-8043

PLEASE NOTE: FLORIDA HAS A VERY BROAD RECORDS LAW. MOST WRITTEN COMMUNICATIONS TO OR FROM THE COUNTY REGARDING COUNTY BUSINESS ARE PUBLIC RECORDS AVAILABLE TO THE PUBLIC AND MEDIA UPON REQUEST.

This email communication may contain confidential information protected from disclosure by privacy laws and is intended for the use of the individual named above. If the reader of this message is not the intended recipient, this is notice to you that any dissemination, distribution or copying of this communication or any attachment to it may be a violation of federal and state privacy laws. If you have received this email in error, please notify the sender immediately by return email and delete this message. Please note that Florida has a broad public records law, and that all correspondence to me via email may be subject to disclosure. Under Florida law email addresses are public records.

From: Beth Fennell
To: FLKeysEvac
Subject: Re: [EXTERNAL] - FL Keys evacuation modeling webinar
Date: Wednesday, November 15, 2023 6:31:15 PM
Attachments: image003.png
image004.png
image005.png

Thank you.

On Wed, Nov 15, 2023 at 5:22 PM FLKeysEvac <FLKeysEvac@commerce.fl.gov> wrote:

> Good Afternoon,
>
> The slide deck and recording of the Florida Keys Hurricane Evacuation Modeling webinar have been made available at www.floridajobs.org/FLKeysEvac.
>
> **Paul Lim, FCCM**
>
> Coastal Resiliency Planner – Southeast Region, Division of Community Development
>
> FloridaCommerce
>
> Office: 850.717.8511
>
> FLORIDACOMMERCE www.FloridaJobs.org
>
> **From:** Beth Fennell <bthfennell@gmail.com>
> **Sent:** Tuesday, November 14, 2023 3:53 PM
> **To:** FLKeysEvac <FLKeysEvac@commerce.fl.gov>

Subject: [EXTERNAL] - FL Keys evacuation modeling webinar

Is it possible to get a copy of the powerpoint and any other data/reports or info from the meeting?

Beth Fennell

29412 Independence Ave

BPK

859 912 2562

This email communication may contain confidential information protected from disclosure by privacy laws and is intended for the use of the individual named above. If the reader of this message is not the intended recipient, this is notice to you that any dissemination, distribution or copying of this communication or any attachment to it may be a violation of federal and state privacy laws. If you have received this email in error, please notify the sender immediately by return email and delete this message. Please note that Florida has a broad public records law, and that all correspondence to me via email may be subject to disclosure. Under Florida law email addresses are public records.

From: Cindy Urban
To: FLKeysEvac
Subject: [EXTERNAL] - Cannot get on Webinar today at 3pm on Hurricane evacuation plan
Date: Tuesday, November 14, 2023 3:21:34 PM

I am very interested in this webinar but am unable to get on....
i registered but have not gotten a confirmation email.

Cindy Urban

305-849-1243

Century 21 Circle

17105 Overseas Highway

Sugarloaf, FL 33042

Be Kind. Everyone you meet is fighting some kind of battle.

From: Beth Fennell
To: FLKeysEvac
Subject: [EXTERNAL] - FL Keys evacuation modeling webinar
Date: Tuesday, November 14, 2023 3:53:10 PM

Is it possible to get a copy of the powerpoint and any other data/reports or info from the meeting?
Beth Fennell
29412 Independence Ave
BPK
859 912 2562

From: josephpenar@aol.com
To: FLKeysEvac
Subject: [EXTERNAL] - Additional development in the Keys
Date: Tuesday, June 13, 2023 11:43:22 AM

The keys cannot sustain further development and still meet the evacuation requirements for the
following reasons:
Our sole highway cannot handle its daily traffic much less the mass evacuation required by
a hurricane.

Vacation rentals are numerous in the keys and no one will enforce the 48 hour requirement.

Our aqueduct system is inadequate for present use much less additional development

In my opinion the keys are overdeveloped at the present time and the additional building
permits being considered will lead to quality of life as well as evacuation issues resulting in
many deaths. Remember the keys lost over 400 in 1935 with a fraction of it's current population.

Joseph and Bobbie Penar
Islamorada

From: Bettina Garber
To: FLKeysEvac
Subject: [EXTERNAL] - Changing the 24 hour clearance time parameter
Date: Tuesday, June 27, 2023 3:39:11 PM

To whom it may concern:

Changing the 24 hour clearance time parameters to allow more development in the Keys? We are very concerned about “over development” here.
Please keep living in the Keys safe.

Paul & Bettina Garber
262 Sunset Drive
Islamorada, FL 33036

From: Barbara Hudgins
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Friday, June 30, 2023 6:54:58 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Concerned citizen.
Michael Hudgins

From: Barbara Hudgins
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Friday, June 30, 2023 6:54:49 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Concerned citizen.
Barbara Hudgins

From:	tahenize@aol.com
To:	FLKeysEvac
Cc:	Last Stand; TAndracke Henize
Subject:	[EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date:	Friday, June 30, 2023 4:07:09 PM

Dear DEO and all:

My family and I are all deeply concerned we're already at capacity and it's time to stop putting lives at risk by allowing more new building in the Keys.
Officials have known for decades about Climate Chaos and should have begun depopulating the Keys by the mid 90s.
But instead, greed and deliberate ignorance, aka denial, has meant every day the problem is worse and the safety of all the people and animals is more doubtful every moment.

Do what's right: STOP building and depopulate, too.

Respectfully,
Tina Henize and family
in the Keys and all over Florida

From:	Harry Appel
To:	FLKeysEvac
Cc:	boccdis1@monroecounty-fl.gov; boccdis2@monroecounty-fl.gov; boccdis3@monroecounty-fl.gov; boccdis4@monroecounty-fl.gov; boccdis5@monroecounty-fl.gov; gastesi-roman@monroecounty-fl.gov
Subject:	[EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date:	Friday, June 30, 2023 3:50:13 PM

To Whom It May Concern:

We live and work in the Florida Keys full time, close to 20 years now. We're concerned we're already at capacity (we personally believe we are already way past capacity), and it's time to stop putting lives at risk by allowing more new building in the Keys. We have a perspective that is unfortunately not unique. Our house was destroyed in Hurricane Irma, and our business was shuttered 2 full years as we went through the rebuild process which is not easy anywhere, but particularly difficult in the Keys. We believe our experience was worsened by not only the density but also the poor oversight of what was previously built. Illegal piers and shoreline hardening were in our area and directly impacted both our home and business (both on the same street). Our home was never rebuilt either.

People coming into the Keys are uneducated about the risks, this was evident during Ian when more than half the empty houses on our street had ZERO preparations done, and when the damages occurred, quite a few were not even tended to for MONTHS.

Our business is in hospitality. We speak with many of our guests about evacuations, risks and storms when they ask us. They barely have a clue about the realities down here and there have been times when we've had to be more forceful with the realities of evacuations regarding guests.

We personally believe one of the reasons more loss of life did not occur here in the Keys during Irma was because so many residents took it upon themselves to evacuate before the call was made. And we saw what happened anyway…. major fuel shortages. We cannot imagine the horrible situations that would occur with a shifted evacuation plan!

It's reckless and shortsighted to continue to allow the building. At some point, the "can" simply cannot be "kicked down the road" anymore, and that time is NOW. Issues should have been tended to before now, and we are all paying the price with our safety and quality of life. It's evident we do not have the infrastructure for continued building, our local water authority has not kept up its side of obligations by maintaining and updated its equipment timely. We lost water via several major breaks on high season. It impacted our own business by not having water, and we know for a fact some restaurants, schools and government buildings had to close due to no safe water. Our bridges and roads are getting worse by the day with the heavy traffic passing through at a volume never anticipated when designed and built.

Someone at some point has to say enough and recognize that citizens and visitors lives are truly at risk. Basically despite the poor decisions of the past we've all just been relatively lucky not having more loss of life in recent history. Yes, there has been major property damages and loss (as we said, we are among them) but we are alive. And we're alive not because of any lifesaving decisions being made regarding development.

Since we've moved here, the "carrot" just keeps being moved, spinning numbers this way or that way. We've had enough and it's beyond difficult for us who are full time residents and stakeholders in this community to continue to see a long term future here. You do not want to continue to lose people like us who are completely invested in this community with our personal lives, business lives, as well as both of us being heavily invested in local community volunteering. It is people like us who are exactly what the Keys need, but are being lost every day due to poor decisions and cost of living.

A 48 hour evacuation is a terrible idea, and will lead to loss of life, property loss and continued degradation of our dwindling and overstressed natural resources. Doing the right thing is not always easy, but that doesn't take away that it's still the right thing.

Respectfully,

Harry Appel
Jennifer DeMaria
Big Pine Key, Florida
Full Time Residents, and Business Owners/Operators

From: squirerose@aol.com
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Friday, June 30, 2023 3:45:31 PM

June 30, 2023

To Whom it May Concern at The Department of Economic Opportunity (DEO)

I am extremely concerned with the increased growth that is being permitted in the Keys and Key West. It was 20 years ago when all you heard about was that we exceeded our carrying capacity and yet we continue to allow more and more housing, building, growth, etc. In the past, in order to not be stuck on US1 for an 8 hour crazily stressful trip out the Keys when a storm is approaching, you would have to leave at midnight.

We exceeded our carrying capacity years ago. Evacuation is already a nightmare. Over a decade ago it took 8 hours plus to get out of the Keys when storms were approaching and mandatory evacuation was in place. The gas stations ran out of gas and people were stuck. One accident alone puts the drive to a complete standstill and people are already frenzied at best under these circumstances.

We're already at capacity, and it's time to stop putting our lives at risk by allowing more new building in the Keys.

Please leave the 48 hurricane evacuation mandate and do not change it to 24 hours. Please do not manipulate math and play with my life.

I have lived here since 1983, that is 40 years and I am certain, that we need to

halt the growth and protect our citizens. It starts with you making the conscientious , right decisions and recognizing that we have exceeded the safe carrying capacity in the Keys, many years ago.

Do the right thing for the people, not for profit.

Kindly and Respectfully,

//Marci L. Rose//

Marci L. Rose

From: phillip mcginn
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Friday, June 30, 2023 3:31:37 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Concerned citizen.

From: Patti Biga
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Friday, June 30, 2023 2:55:56 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Concerned citizen.
Patti Biga

Sent from my iPhone

From: mcmechlers@aol.com
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Friday, June 30, 2023 2:20:14 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys. Respectfully, Concerned citizen.

From: Helen Harrison
To: FLKeysEvac
Cc: Last Stand
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Friday, June 30, 2023 2:07:06 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Helen Harrison

Concerned citizen.

Helen Harrison
Harrison Gallery
825 White St.
Key West, FL 33040
305-294-0609

hh@harrison-gallery.com
www.harrison-gallery.com
www.facebook.com/harrisongallery
www.instagram.com/harrisongallery

From: Pernell Larsen
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Friday, June 30, 2023 2:05:54 PM

Took 8 hours to drive middle Keys to Miami hospital. Just too many people and cars. We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Concerned citizen.
Jody Gross
Key West

From: logoblack
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Friday, June 30, 2023 1:38:26 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Concerned citizen.

Sent from my Verizon, Samsung Galaxy smartphone

From: Lawrence Anthony
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Friday, June 30, 2023 1:31:47 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,
Lawrence Anthony
Concerned citizen.

Sent from my iPad

From: ROB SPROGELL
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Friday, June 30, 2023 1:30:52 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Concerned citizen,
Rob Sprogell
13 Bay Dr
Key West
33040

Sent from my iPhone

From: Christopher Hamilton
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Friday, June 30, 2023 1:19:19 PM

Friends at the DEO -

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new buildings in the Keys. Fix the model. These folks say it better than I can.

Thanks,
Chris
--



Chris Hamilton
812 Fleming Street #4, Key West, FL 33040
(305) 340-9942; chrishamilton170@gmail.com
Development Director, Red Barn Theatre
Friends of Car-Free Key West | Facebook | Blog | Twitter
KONK Life newspaper Streets for People column

From: Mehgan Renee
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Friday, June 30, 2023 10:36:41 AM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Concerned citizen.

Mehgan Heaney-Grier
mhg165@gmail.com
305-797-6382

From: rosalind paragus
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Friday, June 30, 2023 7:29:42 AM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,
Rosalind Paragus

Sent from my iPhone

From: Laura Pacanowsky
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Thursday, June 29, 2023 8:50:27 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Concerned citizen.

Sent from my iPhone

From: Diane VANIDERSTINE
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Thursday, June 29, 2023 5:19:46 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Concerned citizen.

Sent from my iPad
Diane VanIderstine

From: Sandra Sujak
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Thursday, June 29, 2023 4:44:53 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Sandra Sujak,
Concerned citizen.

From: Cynthia Comtois
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Thursday, June 29, 2023 1:44:10 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Concerned citizen.

Cynthia Comtois

Sent from my iPhone

From: Keith Tomlinson
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Thursday, June 29, 2023 6:48:07 AM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Concerned citizen.

Sent from my iPhone 3GS on Cingular Wireless

From: Kris Rosu
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Wednesday, June 28, 2023 7:07:31 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,
Kristina Rosu

Sent via the Samsung Galaxy S23+ 5G, an AT&T 5G smartphone
Get Outlook for Android

From: Ellen Emmerich
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Tuesday, June 27, 2023 6:20:01 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Concerned citizen.

From: Lorraine Schack
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Tuesday, June 27, 2023 1:44:53 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Concerned citizen.

Sent from my iPhone

From: Randy Pekarik
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Tuesday, June 27, 2023 1:37:10 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Concerned citizen.
Randy Pekarik
Key West Florida

Sent from my iPhone

From: Amy Russell
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Monday, June 26, 2023 7:43:53 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new buildings in the Keys. You need to stop allowing the building of the big properties with many units, like the one in Islamorada near Founders. That one property, with its box houses and RV park, added SO many more people. Please stop!

Respectfully,

Concerned citizen
Resident of Key Largo

From: Rick Gudoian
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Monday, June 26, 2023 4:30:15 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Concerned citizen.

Sent from my iPhone

From: Hog Fish
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Sunday, June 25, 2023 10:00:50 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,
Michael Kennedy
823 Indies Rd, Ramrod Key, FL 33042

From: captnronbo
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Sunday, June 25, 2023 6:02:19 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Concerned citizen.

Sent from my Galaxy

From: Bob Winterhalter
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Saturday, June 24, 2023 7:19:22 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Concerned citizen.

Sent from my iPad

From: Kim T. Gordon
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Saturday, June 24, 2023 3:27:49 PM

For the past 20 years, my husband and I have resided on South Point Dr. on lower Sugarloaf Key. A huge development — at least 56 rental units in just phase 1 – has been proposed for the corner of US 1 and South Point Drive. Mind you, this is a small residential community with only 98 homes. All of us must exit onto US 1 at this intersection and we must already wait a very long time to safely enter traffic. In fact it's not uncommon for us to have to turn right instead of left and go up to an area with local businesses and make a left turn through their parking lot and another right turn just to enter back onto US 1 south. The addition of 56 or many, many more units on our corner in the two building phases will make exit impossible during certain times of the day. It will be unsafe and not only cause accidents to increase at that intersection – at least one neighbor who was a local veterinarian has already died at that intersection – it will certainly endanger the safety of the community during hurricane season.

Please reduce the size of this proposed development and others like it!
Thank you,
Kim Gordon

Kim T. Gordon
Executive Director, Music With Heart, Inc.
305-745-2030, mobile 305-619-1678
www.KeysMusicWithHeart.com
Raising funds through music and the arts
to help people in need in the Florida Keys

Sent from my iPad

From: Fred Covan
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Saturday, June 24, 2023 2:35:04 PM

I appreciate the power of greed, and I know we are a capitalistic society. However, I'm concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys. We have reached a point where quality of life and our safety has to Trump, excuse the use of the term, greed. No more buildings.!

Respectfully,

Concerned citizen.

Sent from my iPhone

From: Joy Taylor
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Saturday, June 24, 2023 1:25:10 PM

Please put your full time residents at the top of your list of considerations!!
We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,
Joy Brown Taylor
(Concerned citizen).

From:	Bob Winterhalter
To:	FLKeysEvac
Cc:	boccdis1@monroecounty-fl.gov; boccdis2@monroecounty-fl.gov; boccdis3@monroecounty-fl.gov; boccdis4@monroecounty-fl.gov; boccdis5@monroecounty-fl.gov; council@ci.marathon.fl.us; buddy.Pinder@islamorada.fl.us; sharon.mahoney@islamorada.fl.us; mark.Gregg@islamorada.fl.us; elizabeth.Jolin@islamorada.fl.us; henry.Rosenthal@islamorada.fl.us
Subject:	[EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date:	Saturday, June 24, 2023 11:03:09 AM

Dear DEO members,

We're concerned. We are already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys. When is enough?

Our utilities are working at maximum capacity and roads are congested with constant closures because of accidents or maintenance. Our first responders are already understaffed. We all know that our hospitals are not able to handle any major catastrophe. NOAA / Marine Sanctuary is worried about the quality of the surrounding waters and rapid decline of the sea life and the coral reef.

What will happen if there is a hurricane evacuation during lobster season when an additional 60,000 -70,000 people are here with boats, trailers and campers? Do you really think vacationers are going pick up and leave as soon as there's a warning? God forbid if there is an accident with fatalities and the road is closed for hours. That one incident could delay evacuation by hours and risk many more lives.
If you think our roads are not at capacity, try driving to the mainland on a Saturday or Sunday!

When looking at safety and quality of life for the Keys, everything needs to be truthful and on the table. I trust you will consider the true needs of the Keys and its residents. Please remember your decision maybe a matter of life or death for someone when the next hurricane comes.

Respectfully,

Robert Winterhalter
58950 Overseas Hwy 55
Marathon,FL 33050
941-780-2725

From: Jody Smith Williams
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Friday, June 23, 2023 8:22:04 PM

We’re concerned, we’re already at capacity, and it’s time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully, Concerned citizen.

Jody Smith
Key West

From: Logan & Phebe Blackburn
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Friday, June 23, 2023 2:44:27 PM

We’re concerned, we’re already at capacity, and it’s time to stop putting lives at risk by allowing more new building in the Keys. Respectfully, Concerned citizen.

From: Hareen Gershman
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys.
Date: Thursday, June 29, 2023 6:17:07 AM

PUBLIC SAFETY IS AT RISK– you want to be able to safely evacuate, but Keys traffic is already at capacity *without* an approaching storm. The "early evacuation" (48 hours before the arrival of tropical force winds) is a joke -- there is no way to enforce the 48-hour evacuation. More importantly, the National Hurricane Center tells us the recent trend with "rapidly intensifying storms" means they can't predict what a storm will do 48 hours out (where it will hit; how strong it will be; when it will hit). We have water capacity issues, with freshwater and wastewater pipes breaking, and they must be repaired or replaced to the tune of big bucks.

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,
Hareen Gershman / Concerned citizen

From: Beryn Harty
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys.
Date: Friday, June 23, 2023 3:09:09 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Calculations based on expecting hotel visitors, short term renters, and those in mobiles home to leave early don't make any sense for a variety of reasons. The first is that many of them DON'T and WON'T leave early. Then, those with cars will be filling up and depleting gas supplies which are needed by full time residents. Historically, adequate supplies are NOT replaced in time for full evacuation.

Another problem is that there are many more rentals taking place in the summer and fall months now. not just during season.
A great many of these are not legal rentals and are being left out of official calculations, even though everyone here knows they exist.
No one dares contact code enforcement as one can no longer do so anonymously. Using out-dated seasonal models for resident numbers is inappropriate.

It also doesn't make any sense not to include military personal in your calculations as they will be clogging the roads also.
Additionally, many full time residents DON'T leave until the last moment.

A major issue is that the storms are intensifying with incredible rapidity now, so calculation methods and times from
even ten years ago no longer make scientific sense.

Please stop issuing more ROGOS and increasing the population down here. It's not only a matter of hurricane evacuation issues,
but issues of failing infrastructure such as bridges - and water and sewer lines, impossible traffic US 1 - the only road in or out, and more.

Respectfully,

Beryn Harty
Ramrod Key
A Concerned citizen

From: Fred Covan
To: FLKeysEvac
Subject: [EXTERNAL] - ENOUGH! No new ROGOs for the Keys
Date: Tuesday, July 4, 2023 1:02:52 PM

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys. Don't let greed destroy the quality of life in the Keys and compromise our safety.

Respectfully,

Concerned citizen.

Sent from my iPhone

From: Beth Fennell
To: FLKeysEvac
Subject: [EXTERNAL] - Evacuation model Florida Keys
Date: Tuesday, June 13, 2023 8:24:18 PM

To whom it may concern,

Please hear the concerns of residents and do not change the hurricane model to allow more development in the Keys; no matter what political pressure you are experiencing.

This is a safety issue which could prove tragic if another major hurricane like Irma, Georges, Wilma or Ian hits the Keys.

I've lived full time or part time in the Keys for almost 50 years and experienced the above hurricanes. I've also heard the panicked din of politicians, almost the entire time, that there will be no more building or development in the Keys. It never happens. A way is always found whether it is change the hurricane model, ignore an independent traffic carrying capacity study or other sleight of hand.

The signs are all around us. FKAA can't keep up with the current demand for water or adequately process the current sewage load. Traffic has become beyond manageable on our one and only road in or out.

As stewards of our community and state; Please DO THE RIGHT THING!

Thank you.
Beth Fennell
29412 Independence Ave
Big Pine Key
859 912 2562

From: S Miller
To: FLKeysEvac
Subject: [EXTERNAL] - Evacuation modeling
Date: Friday, June 30, 2023 1:21:01 PM

As a long time resident of Islamorada I am extremely concerned about the evacuation modeling.

This is such a critical life and safety issue for the future of our island community - much consideration needs to go into the process. There are so many variables that we cannot even predict that can impact the safe evacuation of people for decades to come.

1. Change in the nature of storms

- rapid intensification happens more frequently now
- more storms are spawned closer to Florida than ever before
- will there be sufficient notice for phased evacuations

2. Change in our demographics

- size of homes and the actual occupancy has increased even with permanent residents, with guests and accessory living spaces (permitted and unpermitted)
- number of homes used part time by owners that may or may not be occupied during hurricane season
- large homes used full time as vacation rentals with occupancy of 10 - 16 adults - couples all needing to evacuation
-
- The demographics of the area can change based on factors not considered in the modeling. Our workforce cannot currently afford to live in the Keys - tourists pay much more for housing. Economic circumstances can change in the future.
-
- Number of adults with vehicles in a home can change - more adult children living with parents, etc. and all evacuating in individual cars.

3. Phased evacuation

- Even with phased evacuations, the clearance time formula seems to ignore the counts of people required to evacuate early. What is the clearance time (18 hours I believe) for early evacuees as the numbers may not be safely evacuated prior to the need to evacuate those in the 24 hour clearance.
- Too many permanent residents of the Keys are required to evacuate early - affordable housing (1300), mobile home owners, tourists and guests etc.
- The phased evacuation could create havoc for those evacuating later - motels full, roads congested, etc.
-
- Number of phased evacuees - vacation rentals now being built with 5- 10 bedrooms to accommodate larger groups -a all with vehicles to evacuate.

4. Long term implications of current decision

- The decision made now will impact our community for decades if we continue to allow

more growth. Being conservative would allow a bit more flexibility in the future, but allowing more growth can never be corrected.
- Not only does the evacuation modeling impact hurricane evacuations, the clearance time provides a statistical limit of growth that is utilized to protect our environment, our infrastructure and the lives of our residents and visitors.

I hope the modeling will be seriously studied to assure the long term safety of the Florida Keys.

Thank you.

Sue Miller
305-664-1167

From: Andrew D
To: FLKeysEvac
Subject: [EXTERNAL] - FL Keys Evacuation
Date: Saturday, June 24, 2023 8:34:47 AM

Please 4 lane the 18 mile stretch, which is currently falling apart.

Start planning NOW to put a replacement bridge next to the existing 7 mile bridge. At the speed of Government, if you start planning now, construction may start in 40 years. Just think of all the studies you can do! At least 10 years of studies before anything can happen.

Sent from Mail for Windows

From: Emilie Stewart
To: FLKeysEvac
Subject: [EXTERNAL] - FL Keys Hurricane Evac Modeling Comment
Date: Saturday, June 17, 2023 1:20:52 PM

Sirs;

I attended the public workshop in Key Largo, June 14, though I did not speak. I was left with the feeling that representatives from Tallahassee were not really receptive to public comment continuously responding with computer modeling/formula comments to the contrary. I observed one of the representatives continuously on their phone as residents were speaking.

I live in Stillwright Point, which has made local, regional, national and international news for having been salt water flooded by King Tides for as long as 94 continuous days. There are county plans to address our problematic annual flooding in the works, though all will be dependent upon state/federal grants, and nothing will happen in the near future. This is NOT nuisance salt water flooding. There are street sections as deep as 18 inches. Basically, if you are one of the 212 homeowners in this development, you must have an SUV or truck you are willing to sacrifice to salt water.

I was here for Hurricane Wilma in 2005. The roads were impassable. I evacuated for Hurricane Irma in 2017. It was impossible to return for over a week because Stillwright Point was without power and water. The center of Irma passed some 70 miles to the south. I personally evacuated with my pit bull to a Residence Inn in Miramar, which also lost power for 20 hours. Fortunately, I was able to afford a total of 11 days in an extended stay hotel. Many people are not. It would not have been possible for me to go to a shelter in Miami-Dade as pit bulls are banned.

I live in a 1982 wood frame stilt house, which has been strengthened against hurricanes with roof straps, new metal roof, impact windows and doors and Trex decking and Hardie Plank siding. I still would not have stayed for Irma. The street was badly flooded. No power and no water for 8 days. Without sufficient funds, where should I have gone? This is a problem for many Keys residents.

Retired FHP Lieutenant McKinney spoke of the horrendous traffic in the Upper Keys. When I evacuated for Irma, I left 2 days prior with a fully tanked Mercedes. I saw lines 30 cars deep attempting to get gas at the Upper Keys stations. I was in bumper to bumper northbound traffic. Now, 6 years later, this describes typical weekend traffic into and out of the Keys. Every resident has become a prisoner in their own houses each weekend. Six years later, I cannot imagine what an evacuation would look like.

I urge those from Tallahassee to come to the Keys on any Friday and leave the Keys on any Sunday. This in itself is probably the biggest problem residents from here will face with an impending hurricane.

Very truly yours,

Emilie Caldwell Stewart
52 North Blackwater Lane
Key Largo, Florida 33037
3059242739

From: Ronald Cheston
To: FLKeysEvac
Subject: [EXTERNAL] - Florida Keys evacuation, and growth
Date: Tuesday, June 20, 2023 12:28:21 PM

It is very clear the growth rate in the Keys has become more than an evacuation plan can handle. We need to look at what is going on they have torn down trailer parks, taking the permits to build, massive condominiums. If we get a storm we will never be able to evacuate in 48 hours. We most slow down the growth of new building not only for storms, but the inter-structure is unable to handle it. The brand new sewage system is already over capacity. This has become a major safety issue. At some point lives have to be more important than making more tax money.

Thank you
Ron Cheston

From: Ronald Cheston
To: FLKeysEvac
Cc: FLKeysEvac
Subject: [EXTERNAL] - Florida Keys evacuation, and growth
Date: Tuesday, June 20, 2023 12:29:43 PM

It is very clear the growth rate in the Keys has become more than an evacuation plan can handle. We need to look at what is going on they have torn down trailer parks, taking the permits to build, massive condominiums. If we get a storm we will never be able to evacuate in 48 hours. We most slow down the growth of new building not only for storms, but the inter-structure is unable to handle it. The brand new sewage system is already over capacity. This has become a major safety issue. At some point lives have to be more important than making more tax money.

Thank you
Ron Cheston

From:	Steve Hartz
To:	FLKeysEvac; FLKeysEvac
Cc:	Janice Hartz
Subject:	[EXTERNAL] - Fw: No More ROGO"s for Florida Keys
Date:	Friday, June 30, 2023 8:51:33 PM

Please note that I OPPOSE new ROGOS. My last letter had a typo that left out NO ROGO's.

----- Forwarded Message -----
From: Steve Hartz <shartz1071@aol.com>
To: FLKeysEvac@DEO.MyFlorida.com <flkeysevac@deo.myflorida.com>
Sent: Friday, June 30, 2023 at 06:36:53 PM EDT
Subject: No More ROGO's for Florida Keys

Please create more ROGO's for the Florida Keys. It took my wife nearly four hours to get back to Key Largo from South Miami this afternoon. Imagine how long it would take to evacuate the entire 126 mile archipelago! Please, lives are at stake here.

Respectfully,

Steve Hartz
Key Largo

From: Judy Collins
To: FLKeysEvac
Subject: [EXTERNAL] - Fw: Safe Hurricane Evacuation and lack of decent water supply for future residents
Date: Wednesday, June 21, 2023 1:24:40 PM

Dear Sirs:
I am a resident of Big Pine Key and am very concerned about Hurricane evacuation planning with the constant increase of population going on in the Keys. We keep building homes and adding residents knowing full well that we are already at or close to capacity for a safe evacuation of our islands in case of a rapidly approaching catastrophic hurricane. Counting on all residents and tourists leaving 48 hours before an approaching hurricane when it is not made mandatory is ludicrous. Building more homes and adding more residents when we are already at our limits is criminal!!
Last winter we suffered from broken water pipes from our aging water system, and people were without water for days. Adding more population to an already fragile water supply system is just wrong.
Please listen to the concerns of your tax paying residents who just want to enjoy our homes with the peaceful knowledge that we can evacuate a potential hurricane safely and that we will always have clean, plentiful water.
Thank you for your time.

Walter Collins
29431 Constitution Ave.
Big Pine Key, FL 33043

From:	lindaweber@aol.com
To:	FLKeysEvac
Subject:	[EXTERNAL] - Fwd: 2023 Hurricane Evacuation modeling
Date:	Sunday, June 25, 2023 8:44:09 PM
Attachments:	IKLFHA Letter - DEO 2023 Hurricane Evacuation model.pdf

---

I agree with the points in the attached email.
Linda Weber
104500 OVerseas Hwy
Apt C202
Key Largo, FL 33037

-----Original Message-----
From: Dottie Moses <dpmoses@bellsouth.net>
Sent: Sun, Jun 25, 2023 11:33 am
Subject: Fw: 2023 Hurricane Evacuation modeling

The attached letter was sent to the Department of Economic Opportunity from the Federation. Please consider sending your own personal comments to the DEO at FLKeysEvac@DEO.MyFlorida.com
by the June 30 deadline. The outcome of the 2023 Hurricane evcauation modeling will determine future development capacity in the Keys. Can we afford to create any more density in the Keys?

Dottie Moses, President
Island of Key Largo Federation of Homeowner Associations

----- Forwarded Message -----
From: Dottie Moses <dpmoses@bellsouth.net>
To: FLKeysEvac@DEO.MyFlorida.com <flkeysevac@deo.myflorida.com>
Sent: Sunday, June 25, 2023 at 11:23:54 AM EDT
Subject: 2023 Hurricane Evacuation modeling

To the Department of Environmental Opportunity,

Please accept and consider our comments as expressed in the attached letter.

Respectfully,

Dottie Moses, President
Island of Key Largo Federation of Homeowner Associations

THE FEDERATION
ISLAND OF KEY LARGO FEDERATION OF HOMEOWNER ASSOCIATIONS, INC.
iklfha.org • P.O. Box 702 • Key Largo, FL 33037

June 23, 2023

To the Florida Department of Economic Opportunity;

Thank you for allowing the public to weigh in on hurricane evacuation safety.

The Island of Key Largo Federation of Homeowner Associations represents over 2500 property owners in 28 different subdivisions in Key Largo. We would like to express our grave concerns about hurricane evacuation capabilities in the Florida Keys.

Our major concerns are:

- Inaccuracy of the 2012 model
- Lack of regional modeling
- Use of all the latest accurate data in the evaluation
- Concerns about ROGOs
- Ultimate safety of our population

We now know the 2012 evacuation model had some missing data and the actual evacuation time it would take to evacuate permanent residents exceeded the 24 hours by several hours. If mobile homes and military housing had been included, which they should have been as they are permanent residents, the 24-hour evacuation window would have been exceeded even more.

Since 2012, we have watched traffic become ever more congested as we travel our island chain. Many of us avoid getting on US 1 on the weekends and at peak usage times during the week. The 2019 Arterial Time and Delay study evaluated the time it takes to travel to and from Key Largo and Key West, and rated the overall roadway Level of Service as a D, with ZERO reserve capacity for additional traffic to be added to overall US1. The study actually showed a negative 7,419 trips. When this news was learned, the methodology was immediately changed to allow for a better score, without addressing the traffic issues, and traffic has only gotten worse since.

We also find it is more difficult to drive up to the mainland as the traffic in Miami-Dade and Broward counties is also very congested. We cannot imagine being able to evacuate the Keys if these counties were also in the cone. Unlike other county models, the Monroe County model eliminates considering a regional evacuation. Why is this not a variable in the model?

In the event of a last-minute evacuation, like Ft Myers Beach when Hurricane Ian's track suddenly changed, will we be able to get to safety in a timely manner? A phased evacuation is a good idea as long as there is time to do so. Will a calculation be done when there is less than 48 hours to evacuate?

The Department of Economic Opportunity is obligated to reevaluate Monroe County's evacuation potential with the latest data available. We already know the county's population has grown because we experience it and the 2020 census confirms it. Homes that were once vacant during part of the year are now occupied. The school enrollment has increased. Our water usage has increased to the point we are experiencing infrastructure failures. Wastewater spills are so frequent and repetitive that the Department of Environmental Protection has issued warnings. All of this indicates the excessive occupancy of the Keys.

In the 2012 evacuation model, permanent residents such as the military and mobile homes were not included in the 24-hour evacuation phase. In the 1300 ROGO court case the judge determined that the law was intended to include ALL permanent residents. We support the inclusion of military and mobile homes in the calculation for a 24-hour evacuation. The Clerk of the Court reports that the US Armed Services employed 14,570 people in Monroe County in 2022. With such high numbers, surely the armed forces effect the evacuation of the Keys. (Question: Don't those employees have family also?)

It is hard to believe, with the additional legislatively created 1350 ROGOs, the increase in population, the inclusion of left out housing (military and mobile homes) and the loss in Level of Service of US 1, that any more residents could be squeezed into the 24-hour evacuation time frame. Please keep our safety in mind when recalculating the new evacuation model. We are hearing rumors that deals are already being made to create more ROGOs. That would imply that politics and not safety is driving the bus.

It is very troubling to see the rules changed every time a limit is reached. The cold hard facts of road capacity, permanent residents and 24-hour time limits, rather than an outcome that generates more ROGOs, should determine our hurricane evacuation results. Please allow us to believe in the integrity of the process by being honest with the data and the rules.

Hurricane Irma left a path of destruction from Ocean Reef in North Key Largo to Key West. Almost all homes and businesses in the Keys lost power, water, sewer, cell service, and Internet service. Hospitals were out of service, law enforcement radio communication was out, there was no water, and the sewer system wasn't working. Our community was not functioning at all. It is easy to see how perilous things become after a storm passes through.

Evacuation, while inconvenient, is necessary because many deaths happen after a hurricane in the midst of the chaos that is left behind. While 66 people died from the direct impact of Hurricane Ian, another 90 died after the storm passed from indirect causes such as accidents and lack of medical care.

Weather forecasting has improved greatly over the years but the National Weather Service still recognize there are forecast errors especially with rapid intensification. Hurricane Harvey was a depression when folks went to work in the morning and a category 1 hurricane by 5 PM the same day.

The weather service reminds us that storm surge has 33 times the force of wind. So, a home built to withstand 180 mph winds may not survive a lesser hurricane with a storm surge and the Keys are very vulnerable to storm surge.

We urge you to consider an evacuation scenario that does not take anything off the table. Consider a scenario where there is full occupancy of the Keys, and less than the full 48 hours available to evacuate.

We rely on you to be sincere in your calculations so that we can trust that the conclusion of the 2023 hurricane evacuation model is the safest outcome possible for all its residents and visitors even if it hits on a completely occupied Labor Day weekend.

Thank You for keeping us safe,

Dottie Moses, President
Island of Key Largo Federation of Homeowner Associations
P. O. Box 370702, Key Largo, FL 33037

ANGLERS PARK HOMEOWNERS ASSOC., BUTTONWOOD BAY HOMEOWNER'S ASSOC., CALUSA CAMPGROUND CONDOMINIUM ASSOC., HOMEOWNER'S ASSOC. OF CORAL COAST, HAMMER POINT HOMEOWNER'S ASSOC., HIBISCUS PARK HOMEOWNER'S ASSOC., PIRATE'S COVE POPERTY HOMEONERS ASSOC. PORT LARGO RESIDENTIAL HOMEOWNER'S ASSOC., ROCK HARBOR CLUB CONDOMINIUM ASSOC., ROCK HARBOR ESTATES HOMEOWNER'S ASSOC., SEXTON COVE HOMEOWNER'S ASSOC., SILVER SHORES LEASEHOLDERS ASSOC., STILLWRIGHT PROPERTY OWNER'S ASSOC., SUNSET WATERWAYS HOMEOWNER'S ASSOC., TAMARIND BAY CONDOMINIUM ASSOC., TAYLOR CREEK VILLAGE HOMEOWNER'S ASSOC., THE HARBORAGE HOMEOWNER'S ASSOC.,THE SANCTUARY CONDOMINIUM ASSOC., WYNKEN BLYNKEN & NOD HOMEOWNER'S ASSOC.

From: Leonel Plasencia
To: FLKeysEvac
Subject: [EXTERNAL] - Hurricane evacuation
Date: Tuesday, June 20, 2023 10:22:42 AM

To whom it may concern,

The last hurricane that hit marathon caused such a nightmare for evacuation for us as residents of the keys. It took over 6 hours to get to Miami because of the traffic. Not sure who's playing with the lives of key's residents but I assure you a group of us has hired a law group to research the legality of a county risking the lives of the residents in favor of more congestion in an already congested county.
When does the safety of us, the residents, become a promover building more infrastructure?
Clearly the only interest is in dollars not lived. Would a giant class action law suit be the answer? We will see……sincerely. A concerned full time resident.

Sent from my iPhone

From: Julie Joyce
To: FLKeysEvac
Subject: [EXTERNAL] - Hurricane Evacuation DEO Meeting Thoughts
Date: Monday, June 12, 2023 5:24:05 PM

From Julie Joyce-Rehbock
Registered Voter and Full Time Resident!

I appreciate the opportunity to share my concerns in this email, however it would be so much better to provide a ZOOM link for this important meeting when so many winter residents are not in residence but still care about these issues. Not everyone knows to send in their concerns.

My husband and I have been in the Keys 43 years. He is now 96 and I am 79. This is our 2nd year as full time residents having spent 8 months here in Marathon each Winter and returning to New York for 4 months each summer. Now we are here Full Time!

We of course are concerned about an evacuation and we certainly want every opportunity to leave safely and with the least amount of stress.
It is so obvious in seeing the increase of Vacation Rentals and theTraffic increasing more each season is quite concerning.
With no way to assure these visitors and rentors will leave at the 48 hour time frame…. It really puts residents possibly in harms way.
Our roads are already full on just normal days… what a situation it would be for so many more people trying to get out in time on ONE ROAD.
Please think this out very carefully and do the right thing for those of us that have loved the Keys for so many years…and want to stay safe in the event of an Hurricane Evacuation!
It is ENOUGH!
Thank You for your consideration!

Respectfully Submitted: Julie and Bob Rehbock

Sent from Yahoo Mail for iPhone

From: nancy diersing
To: FLKeysEvac
Subject: [EXTERNAL] - Hurricane evacuation in Florida Keys.
Date: Thursday, June 29, 2023 11:40:43 AM

Dear DEO representative

I am writing to you to share my concerns regarding hurricane evacuation in the Florida Keys. The 2023 hurricane evacuation modeling should be done in such a way as to err on the side of safety. Accurate data should be used and a regional analysis conducted to produce a realistic outcome. Having lived here for 30 years, I have seen the traffic impacts worsen over time. This also pertains to the traffic in Florida City—a place that must be passed through in order to evacuate prior to the storm. Even several years ago, traffic jams were an issue in Florida City and elsewhere.

The one and only highway in the Keys can become a parking lot in a matter of minutes. The thought of people being caught in a jam as the storm approaches is not a good one. I have also noticed that the landfall location and cone of the storm can and does change at the last minute.

Traffic issues have become routine and road improvements take many studies, time and money More importantly, space to adapt to a growing population is virtually nonexistent. Efficient evacuation should be of the highest priority and is not a luxury. Many people live here during hurricane season and their safety should be of the highest concern.

Thank you for your attention to this matter.

Best Regards,

Nancy Diersing

Sent from my iPad

From: Joyce Newman
To: FLKeysEvac
Subject: [EXTERNAL] - Hurricane Evacuation Modeling - Public Safety Considerations
Date: Friday, June 30, 2023 2:48:46 PM

DEO Staff,

It's no exaggeration to say, "lives are at stake!" Please approach the current Florida Keys Hurricane Modeling process carefully, being mindful of "public safety" and taking into account the many changes have taken place in the Keys during the past decade (more homes, more businesses, more visitors, more people).

As a storm approaches, my neighbors and I want to be able to evacuate safely, however Keys traffic is already congested on a regular basis. US1 is our only evacuation route, and it's single-lane for much of its length in Monroe County. Reaching the Monroe County-Dade County line is only part of the process, however, as my neighbors and I would then be competing with Florida City, Homestead, and South Dade evacuees for evacuation road space.

Something I worry about is the "two-phase evacuation plan" (Phase 1 at 48 hours is supposed to start evacuation of visitors, residents of mobile homes, military personnel and their families, boat liveaboards, and folks living in RVs in RV parks and campgrounds), but there is no way to enforce "early evacuation" of these groups. So "early evacuation" is a paper tiger – the numbers look good on paper, but many Phase 1 folks will be on US1 at the same time as my neighbors and me.

The "two-phase evacuation plan" is predicated upon having adequate warning as a damaging storm approaches. So, of great concern is the advice from folks at the National Hurricane Center that their storm forecasting abilities are limited as the impacts of Climate Change are playing out (warmer ocean waters, king tides, stronger storms, rapidly intensifying storms). We are told the term "rapidly intensifying storms" means storms that appear at a distance as low-grade tropical storms can become strong hurricanes in less than 24 hours. This makes implementation of a "two-phase evacuation plan", starting at 48 hours, virtually impossible.

It appears the Florida Keys are already at, or have exceeded, our "carrying capacity". Between regular traffic congestion on US1, low potable water pressure due to a degraded, decades-old, FKAA pipe system, and problems with various leaking wastewater treatment facilities, adding any new development defies logic. Instead, our emphasis should be on re-development (and possible re-purposing) of existing structures. The reality of our limited land mass and stretched infrastructure needs to be heeded.

Thank you for the opportunity to submit comments on the current Florida Keys Hurricane

Modeling process. I'll say it again, because it's true, "lives are at stake!"

Joyce Newman
Big Pine Key

From: Susan H
To: FLKeysEvac
Subject: [EXTERNAL] - I support the following statement:ENOUGH ! No new ROGOs for the Keys
Date: Sunday, June 25, 2023 1:40:16 PM

We’re concerned, we’re already at capacity, and it’s time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,
Susan Hobbins
Concerned citizen.
--

Inline image



June 30, 2023 Sent by email: FLKeysEvac@DEO.MyFlorida.com

Florida Department of Economic Opportunity
Division of Community Development
Attention: BCPG
The Caldwell Building
107 East Madison Street, MSC-400
Tallahassee, FL 32399

RE: Florida Keys Hurricane Evacuation Model Update

Dear DEO Staff,

Thank you for conducting the recent Hurricane Evacuation Model Update Community Meetings in Monroe County. After listening to your plans, we ask that you prioritize "*safety first"* over all other considerations. As the 2023 Model update will significantly impact public safety, we respectfully submit the following comments and concerns pertinent to the safe evacuation of the Florida Keys in the event of a major hurricane.

Since the update of the Florida Keys Hurricane Evacuation Model in 2012, there have been significant changes in Monroe County (more residential development, more commercial development, and more tourism), resulting in significantly more people and more traffic to safely evacuate on a single, mostly two-lane road out of the Florida Keys.

Related to safe hurricane evacuation is the "carrying capacity" of the Florida Keys. Both freshwater and wastewater infrastructure is already at a breaking point, as evidenced by recent repeated freshwater and wastewater pipe breaks and the associated replacement and repair costs expected to exceed one billion dollars.

We strongly agree that the US Navy personnel and their families, as well as residents of mobile homes, should be included as permanent residents in the updated Model.

We strongly believe the existing paradigm of "two-stage evacuation" (Phase 1 at 48 hours; Phase 2 at 24 hours) is inadequate, unsafe, and problematic for these reasons:

--the reality of "rapid intensification storms" (tropical storms that escalate to CAT 3-4-5 hurricanes in under 24 hours) has become the recent norm

--the reality of *sea-level rise* associated with *climate change* (producing even persistent sunny-day flooding) means storm-surge flooding may inundate portions of the only evacuation route (US1) far earlier than previously calculated

--the assumption, that all tourists and visitors will evacuate 48 hours ahead of predicted landfall of a major hurricane and not create barriers in traffic to a safe evacuation of residents, was unrealistic in 2012 and is much less realistic today

--there has been a significant increase in tourists and visitors occupying *vacation rentals*, due to the proliferation of AirBNB and VRBO lodgings (this fact is underscored by the dramatic increases in Tourist Development Tax revenues); vacation rental occupants are not knowledgeable of Monroe County emergency mandates, notifications, or evacuation timing (48 hours for visitors)

--the 2012 Model excluded over 20,000 “vacant homes”, yet it has been documented that 15,101 of them (75%) are for “seasonal, recreational or occasional use” (IC-12, Vol 1-11 South Florida), meaning they could be occupied at any time

--there is no enforcement mechanism to implement the “two-stage evacuation”

While we understand that FS Section 380.0552 provides general guidance for the Modeling process, we urge your team to consider the need to make substantive changes in the assumptions of the updated Model, to increase the likelihood of safe evacuation for Florida Keys residents.

Those changes should include:

--considering “regional factors” (ending the Evacuation Model at Florida City ignores the massive growth that has taken place over the past 10+ years; the assumption that Dade County residents would not be on US1 and the Florida Turnpike when Florida Keys residents arrive is unrealistic and places lives at risk)

--considering impacts of the additional 1,350 housing units now available to Monroe County *in addition to* the 3,550 housing units previously planned to be available until 2023 (in the 2012 MOU; in 2020, the Third District Court of Appeal made clear that the 1300 additional housing units “fail to maintain a hurricane evacuation clearance time for permanent residents of no more than 24 hours, as required by … Florida Statutes; the Court repudiated the scheme that these new 1,300 building permits [permanent households] would simply be required to evacuate at 48 hours, in order to appear to meet the 24-hour evacuation mandate; *however*, the Florida Legislature recently overruled the Court’s decision, resulting in those additional 1,300 plus another 50 housing units being active)

--adjusting the 24-hour “flow rate” to match the reality that many people will not evacuate at night (the 2012 Model assumes this 24-hour “flow rate”, however model experts dispute this assumption of steady flow during a 24-hour period

--revisiting the hurricane evacuation clearance time for permanent residents of no more than 24 hours (the impacts of climate change and lack of improvements in weather forecasting [to accurately predict rapid intensification, timing, and the path of storms] are important considerations)

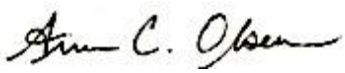
--including the active participation of independent and objective experts and professionals in Weather and Hurricane Forecasting and Emergency Management. This would add critical knowledge to the process and supplement DEO's concentration and experience in economic development and tourism

We also ask you to consider the "lessons learned" from the landfall of Hurricane Ian on the west coast of Florida on September 28, 2022, and the 149 lives lost. It appears changing numbers on paper does not translate into safe hurricane evacuation.

While the recent Hurricane Evacuation Model Update Community Meetings in Monroe County are past, we believe ongoing public input on key decisions is critical to the success of the process, culminating in a robust, updated Model and resulting in safe hurricane evacuation in the Florida Keys. Therefore, we suggest the development and communication of a calendar, with reasonable advance notice, of planned important dates and decisions to facilitate ample opportunities for public input and education of the residents of Monroe County.

Thank you for the opportunity to provide input and feedback to this important process. We believe our shared, #1 concern is *public safety*, and we feel the updated Model should reflect the above known issues. We base our comments on experts in the field and stand ready to supply specific data and/or contacts with knowledgeable experts to aid in the current Modeling process.

For the Last Stand Board of Directors,



Ann Olsen, President

From:	Mary Spillane
To:	FLKeysEvac
Cc:	Last Stand Board
Subject:	[EXTERNAL] - Last Stand"s Hurricane Evacuation Modeling Comments to DEO
Date:	Friday, June 30, 2023 10:31:14 AM
Attachments:	Last Stand Hurricane Evacuation Model Comments to DEO.pdf

---

Good morning,

Attached please find Last Stand's public comment regarding the new Hurricane Evacuation Modeling. If you have any questions or comments, please email us at info@keyslaststand.org.

Thank you for your assistance.

--
Mary Spillane
Executive Coordinator
Last Stand of the Florida Keys



From: David Moreland
To: FLKeysEvac
Subject: [EXTERNAL] - No more development
Date: Monday, June 26, 2023 7:23:38 PM

It’s not a good idea to develop more of Monroe County. Traffic is terrible with too many people and our reef (which draws people here to begin with) is dying. Please stop destroying what is left.

Sent from my iPhone

From: Steve Hartz
To: FLKeysEvac
Subject: [EXTERNAL] - No More ROGO"s for Florida Keys
Date: Friday, June 30, 2023 6:37:02 PM

Please create more ROGO's for the Florida Keys. It took my wife nearly four hours to get back to Key Largo from South Miami this afternoon. Imagine how long it would take to evacuate the entire 126 mile archipelago! Please, lives are at stake here.

Respectfully,

Steve Hartz
Key Largo

From:	Joe Shea
To:	FLKeysEvac
Cc:	Last Stand; Mayor@cityofkeywest.fl.gov; District1@cityofkeywest.fl.gov
Subject:	[EXTERNAL] - No More ROGOs
Date:	Friday, June 23, 2023 5:07:42 PM

Dear Sir:

We are concerned about the ability to evacuate the Florida Keys. At least once a month we drive a round trip from Key West to Miami and observing the continued building of new housing along the way deeply concerns us.

We don't believe the Keys can be safely evacuated as it is, because the model used is deeply flawed. One can't assume all tourists and Naval personnel will evacuate 48 hours in advance. It is human nature to delay (will the hurricane veer away at the last minute?) Everyone knows the slightest accident blocks the highway for hours. There is no alternate route.

We fear a repeat of the 1935 hurricane where the railroad waited to the last minute to evacuate its workers – ending in disaster. Now we fear a crowded highway, at a standstill, with thousands of cars destroyed as the inevitable hurricane hits. Countless lives will be lost.

We need to not only stop expanding the population of the Keys, but to upgrade and make realistic, the evacuation plan.

Sincerely,
Joseph M Shea
Susan H Shea
526 Simonton St.
PO Box 4644
Key West, FL 33041

Sent from Mail for Windows

From: James Doran
To: FLKeysEvac
Subject: [EXTERNAL] - Overdevelopment
Date: Monday, June 26, 2023 7:13:05 PM

As a resident of the Keys for over 50 years and as a south Florida native I have watched as overdevelopment degraded our environment and put tens of thousands of people in jeopardy. You know we have only one road out of the Keys and we are at max population to get people out of the Keys when under the threat of a strong hurricane. The program we have works and keeps people safer. Do not allow more development!!!

Dr. James A Doran
Islamorada

“The world is a book, if you don’t travel you read only one page.” Saint Augustine

From: Fort Nite
To: FLKeysEvac
Subject: [EXTERNAL] - Please, No new ROGOs for the Keys
Date: Tuesday, June 27, 2023 10:29:30 AM

To Whom It May Concern,

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new buildings in the Keys. I'm a mother of 2 children and live in Key West at the end of the road. Traffic on US1 has already increased substantially since I moved here in 1998. I have evacuated on numerous occasions and would like to be able to continue to do so in a safe manner to make sure my family is safe. Please don't add any more building rights to the Keys. We are definitely at capacity and yes we are struggling with affordability but building more is not the answer.

Respectfully,
Alicia Farrer/ Concerned citizen

From:	Joan Scholz
To:	FLKeysEvac
Cc:	boccdis1@monroecounty-fl.gov; boccdis2@monroecounty-fl.gov; boccdis3@monroecounty-fl.gov; boccdis4@monroecounty-fl.gov; DistrictI@cityofkeywest-fl.gov; DistrictII@cityofkeywest-fl.gov; DistrictIII@cityofkeywest-fl.gov; DistrictIV@cityofkeywest-fl.gov; DistrictVI@cityofkeywest-fl.gov; Mayor@cityofkeywest-fl.gov; buddy.Pinder@islamorada.fl.us; sharon.mahoney@islamorada.fl.us; mark.Gregg@islamorada.fl.us; elizabeth.Jolin@islamorada.fl.us; henry.Rosenthal@islamorada.fl.us; jim.mooney@myfloridahouse.gov; boccdis5@monroecounty-fl.gov
Subject:	[EXTERNAL] - Public Comment - Florida Keys Hurricane Evacuation Modeling Workshops
Date:	Monday, June 26, 2023 4:41:45 PM

DEO,

We are already at capacity in the Florida Keys with the overdevelopment, excessive traffic, illegal rentals (massive amounts of people staying in one residence) impact to our extremely fragile ecosystem and environment. I attended the Modeling Workshop in Key Largo at the Murray Nelson Building where I and many other residents provided public comment in opposition to extending the evacuation period over the current 24 hour evacuation time. As demonstrated by the Florida Keys Aqueduct Authority's 3 water main breaks in March and the loss of our drinking water reserve, the Aqueduct cannot keep up with the excessive overdevelopment in the Florida Keys. In addition, with the hurricane development in the Caribbean versus Africa and Hurricane Rapid Intensification, 24-hour evacuation may not be enough time.

Please do not put more development over the safe evacuation of our residents and visitors.

Please feel free to contact me with any questions you may have. I can be reached on 305-619-0139.

Sincerely,
Joan Scholz
Plantation Key

From:	Edie
To:	FLKeysEvac; Lim, Paul
Cc:	Joseph Primavera; edie
Subject:	[EXTERNAL] - Public Comment on FLKeysEvac
Date:	Monday, June 12, 2023 2:34:22 PM

Florida Department of Economic Opportunity
Division of Community Development
Attention: BCPG

Dear Mr. Lim,

Thank you for sending us a copy of the agenda items for the Hurricane Evacuation Modeling Workshop. We plan to attend in person and ask that this email be included for the record in the Public Comment section.

We know that the results of the Hurricane Evacuation will be used to determine if the Florida Keys are following the state evacuation timelines for tropical and hurricane storm landfalls. We ask that the model represent the totality of ALL land and marine dwellings to count residents, military personnel, and visitors. This includes houses, mobile homes, RVs, campsites, and liveaboards. There should also be a factor added for the homeless population and folks that are staying on friends' couches because they cannot afford a place of their own. One house could have 10 people living there.

The model cannot assume homeowners not in-residence April 1 equals an empty house. The summer vacation rental population is increasing and you cannot input the model off who has a rental license, as many are under the licensing radar.

We also cannot rely on the assumption that all visitors, tourists, and military personnel will evacuate 48 hours or more ahead of storm landfall. We cannot rely on our Key's hospitality workforce, which turns over rapidly, to understand the risk of storm surge and know to leave several days ahead. They are barely making ends meet with their hourly wage and want to stay if they have work.

We listened to a hurricane presentation last week given by meteorologist Jon Rizzo. While the NWS is getting better at predicting the cone, they still have challenges with Rapid Intensification. They did a good job forecasting Hurricane Ian's increase, but one data point does not make a trend. We are very concerned what climate change and warming oceans will do to rapid intensification.

As you are aware, the Keys have one road to safety. ONE. If there is an accident that blocks passage north, we are in harms way. This is a public safety issue. Is Emergency Management monitoring or enforcing compliance? Is anyone? The model must add a factor for recalcitrant citizens.

Lastly, and most importantly, we are aware that the DEO is about Economic Development. We think the Keys are reaching their capacity for water, sewage, and

environmental pressures for additional land use. Visitors come to enjoy our Paradise and we cannot lose sight of what that means before it is gone forever.

Respectfully submitted,

Joseph and Edith Primavera Ramrod Key, FL

From: MARY VANDEN BROOK
To: FLKeysEvac
Subject: [EXTERNAL] - Public Comment
Date: Sunday, June 25, 2023 2:21:51 PM

I attended the Hurricane Evacuation Modeling Workshop on June 13, 2023, at the Marathon Government Center. I have been a permanent full-time resident of the Lower Keys for 35 years. I have evacuated the Keys for hurricanes on more than one occasion. I have also remained in my home for a number of hurricanes and tropical storms. I appreciate the necessity of evacuation for personal safety, and I pay close attention to official statements and warnings. The difficulty of evacuation via US 1 is a major concern for me as the density of development continues to increase throughout Monroe County and south Dade.

The information presented at your June 13th Workshop included the fact the current model for evacuation of the Keys has been in effect since 2012. By statute, we are required to evacuate within a 24 hour period. Our ability to do so has been impacted by the staggering amount of development in the Keys since 2012. Even since Hurricane Irma in 2017, development has been increasing dramatically. For example, the small KOA campground in Sugarloaf has added two motel buildings, Knights Key campground in Marathon has become a large luxury resort, numerous small trailer parks from Key West through Key Largo have been redeveloped into higher density housing, and the area of Florida City and Homestead, through which our evacuation route lies, has been transformed from agricultural land to housing, hotels, a new hospital, and commercial developments.

The proliferation of transient rentals, both legal and otherwise, only adds the congestion of the Keys and our one evacuation route. At the Workshop, some the planning assumptions concerning transient rentals seemed off-base. For example, assuming that only one vehicle will be used per transient unit is not the reality. My experience with transient rentals in my neighborhood shows three vehicles per unit, along with trailered boats and jet-skis. All adding to road congestion and difficult evacuation of non-residents.

The Workshop information did not address the mechanism by which evacuation orders are communicated. While residents might have learned where to find this information, the same cannot be said of our visitors. The hotels and lodging association do respond and advise guests to leave, as do State Parks and campgrounds. Transient rental occupants may not get timely notice from owners, and this will add to more traffic congestion as we all hit the road at the same time.

Finally, in the 35 years I have lived in the Keys, the efforts of the tourism industry have done away with the "slow summer season" that coincided with Hurricane Season. There is a festival or event, virtually every weekend, drawing visitors and vehicles to the Keys. Businesses used to close for part of the summer and early fall -- this no longer happens. The Keys are busy year round. And, our population has definitely increased in the past several years. All this combines to make safe and orderly 24 hour evacuation time unrealistic for many residents.

Thank you for considering my comments.

Mary Vanden Brook
739 Hudgins Street
Summerland Key, FL 33042

From: Constitution Canal
To: FLKeysEvac
Subject: [EXTERNAL] - Public comments regarding Hurricane evacuation modeling workshop
Date: Tuesday, June 20, 2023 11:14:46 AM

Dear Department of Opportunity,

I am writing to address the important task undertaken by the DEO of reviewing modeling information and census data every 10 years, specifically in regard to predicting the safety of residents and vacationers during hurricane evacuations in the Florida Keys.

In my view, it is imperative to uphold the current hurricane evacuation modeling process to prioritize the safety of the public and secure the future of our islands. Rather than relying solely on calculated figures, it is crucial to consider the realities on the ground. Every resident and vacationer should be accounted for, adequately informed, and provided with accurate timelines for safe evacuations. To ensure responsible and safe evacuations during emergencies, I strongly believe that we must adopt a conservative approach by slowing down development in the Keys. It is worth noting that we only have one road serving as both entry and exit points which already is at maximum capacity during peak hours. Try driving through Islamorada on a Saturday after 1 pm now.

Within the scope of the review, I would like to draw attention to a few additional factors. Firstly, we need to assess the potential impact of hurricanes on our electric and water utilities. Severe weather conditions can disrupt these essential services, causing further challenges for residents and vacationers during evacuations and in the aftermath of a storm. Adequate planning and infrastructure enhancements should be prioritized to minimize disruptions and ensure the timely restoration of these utilities.

Furthermore, I urge consideration of the rising usage of electric vehicles and the necessity for strategically located rapid charging stations, not only in the upper Keys but also on the mainland. This approach would reduce the risk of individuals becoming stranded and impeding the evacuation process. Additionally, we must address the awareness and preparedness of individuals residing in vacation rental properties who may be uninformed about evacuation procedures, potentially leading to them getting trapped or underestimating the dangers of staying during a storm. Lastly, it is of utmost importance to prioritize the evacuation of individuals residing in ground-level homes, mobile homes, recreation vehicles, and boats, as they comprise a significant segment of our population.

I kindly request that you carefully consider these points while making decisions regarding the future of our community.

Thank you for your attention.

Sincerely,
Suzanne Forbes

From:	Bret Forbes
To:	FLKeysEvac
Cc:	Bretforbes@earthlink.net
Subject:	[EXTERNAL] - Public Comments Regarding Hurricane Evacuation Modeling Workshops
Date:	Tuesday, June 20, 2023 11:15:02 AM

To the Department of Opportunity,

I’m aware that the DEO has the arduous task of reviewing modeling information and census data every 10 years to predict the safety of residents and vacationers regarding hurricane evacuations for the Florida Keys.

I believe that the current hurricane evacuation modeling process is critical to maintain public safety and the future of our islands. Consideration should be based on reality and not just calculated numbers as every resident and vacationer should be counted, informed and given accurate timelines regarding safe evacuations. Due to this, I feel development in the Keys should be slowed down and maintained at a conservative rate in order to safely evacuate everyone in a responsible and safe manner during emergencies. We only have one road in and the same road out.

A couple of things that should be included in the review include: electric vehicle usage and the need for strategic rapid charging stations in the upper Keys and the mainland in order to reduce people becoming stranded and clogging up the process during evacuations; people living in vacation rental properties who may be uninformed regarding the process and may become trapped or feel as though they may be safe to ride out the storm; people who live in ground-level homes, mobile homes, recreation vehicles and boats should be among the first ones evacuated along with the vacationers.
These people make up a large segment of the population and must be evacuated prior to the 48-hour early evacuation plan.

Please take these thoughts into consideration while making your decision on the future of our community.

Thank you.

Bret Forbes

From: dgovus@ellijay.com
To: FLKeysEvac
Subject: [EXTERNAL] - re: Florida Keys evacuation
Date: Friday, June 30, 2023 1:54:52 PM

Managers

There are already too many residents either full or part time at any given moment to evacuate the Keys safely. Traveling up and down the Keys even without a hurricane is tedious, slow and difficult. In advance of a hurricane nearly impossible. If the orderly evacuation of the Keys in event of a hurricane is considered to be desirable there can not be any more building permits issued. The current situation could result in vehicles (and people) being stranded on the highway as a hurricane arrives.and more building permits will just increase the odds of this happening.

Regards

David Govus
823 Galveston Lane
Key West , Florida

From:	Robert S. Gold
To:	Mary Spillane; FLKeysEvac
Cc:	Last Stand Board
Subject:	[EXTERNAL] - Re: Last Stand"s Hurricane Evacuation Modeling Comments to DEO
Date:	Friday, June 30, 2023 11:10:55 AM

Outstanding content. Outstanding team effort.

Robert S. Gold

(847) 724-8376 < tel
RobertSGold@gmail.com

------ Original Message ------
From "Mary Spillane" <mspillane@keyslaststand.org>
To FLKeysEvac@deo.myflorida.com
Cc "Last Stand Board" <Board@keyslaststand.org>
Date 6/30/2023 09:30:19
Subject Last Stand's Hurricane Evacuation Modeling Comments to DEO

Good morning,

Attached please find Last Stand's public comment regarding the new Hurricane Evacuation Modeling. If you have any questions or comments, please email us at info@keyslaststand.org.

Thank you for your assistance.

--
Mary Spillane
Executive Coordinator
Last Stand of the Florida Keys



From: Judy Collins
To: FLKeysEvac
Cc: Joyce Newman; Bret Forbes
Subject: [EXTERNAL] - Safe Hurricane Evacuation and lack of decent water supply for future residents
Date: Monday, June 19, 2023 2:49:08 PM

We are residents of Big Pine Key and are very concerned about Hurricane evacuation planning with the constant increase of population going on in the Keys. We keep building homes and adding residents knowing full well that we are already at or close to capacity for a safe evacuation of our islands in case of a rapidly approaching catastrophic hurricane. Counting on all residents and tourists leaving 48 hours before an approaching hurricane when it is not made mandatory is ludicrous. Building more homes and adding more residents when we are already at our limits is criminal!!
Last winter we suffered from broken water pipes from our aging water system, and people were without water for days. Adding more population to an already fragile water supply system is just wrong.
Please listen to the concerns of your tax paying residents who just want to enjoy our homes with the peaceful knowledge that we can evacuate a potential hurricane safely and that we will always have clean, plentiful water.
Thank you for your time.

Judy and Walter Collins
29431 Constitution Ave.
Big Pine Key, FL 33043

From:	Robert S. Gold
To:	FLKeysEvac
Subject:	[EXTERNAL] - THIS IS MADNESS. NO MORE BUILDING PERMITS IN THE FLORIDA KEYS!
Date:	Thursday, June 29, 2023 5:48:00 PM

To the DEO:

As a property owner in Key West, I am passionately opposed to any adjustment to the Hurricane Evacuation model that results in the issuance of more residential building permits in Monroe County. The model was tweaked in 2012 to allow more growth, and we are now OVER OUR CARRYING CAPACITY. Our fresh water infrastructure has been stretched beyond its capacity, as evident with multiple failures of the main supplying us with fresh water, and reduced pressure. Our sewer and waste treatment systems are poorly managed, stretched beyond their capacity, and directly responsible for dumping raw sewage into the precious near shore waters that are so important to our economy.

The evacuation model is flawed in so many ways, it is laughable. It is clear that DEO did in 2012, and appears poised to again torture the model parameters to gain the outcome that the lobbyists crave; even more development. Putting the economic interests of the few over the public safety of everyone is the hallmark of crony capitalism embraced in Tallahassee. The model assumes no road work (which is constant, especially considering the need for ongoing update to the fresh water infrastructure), assumes that no one on the mainland will be clogging the Turnpike during an approaching storm, and dangerously pushes entire groups from the 24 hour evac group into the 48 hour group with ABSOLUTELY NO MEANS OF ENFORCEMENT. The tragedy of hurricane Ian last year was amplified by short-sighted and ineptitude by state and local government. WILL DEO IGNORE THE LESSONS OF IAN?

At the same time we struggle with demand exceeding supply for vacation rental housing, resulting in an ever-shrinking pool of affordable housing for our workers, the Monroe TDC in a RUNAWAY FREIGHT TRAIN collecting taxes and spending those taxes to promote tourism well beyond rational target geographies. WE NEED FEWER TOURISTS, NOT MORE.

Additional building permits, even if set aside for affordable housing, exacerbate the problem. Every new residence results in more vehicles attempting to evacuate, and every residence draws more fresh water simply to flush toilets.

THIS IS MADNESS. NO MORE BUILDING PERMITS IN THE FLORIDA KEYS!

Robert S. Gold

(847) 724-8376 < tel
RobertSGold@gmail.com

From: SHIRLEY GUN
To: FLKeysEvac
Subject: [EXTERNAL] - Update of the Hurricane Evacuation Model 2023 - Comments
Date: Tuesday, June 27, 2023 4:02:04 PM

I am a full-time resident of Ramrod Key, in the Lower Florida keys, Monroe County.

I have lived here full time since 2002, almost 21 years.

In that timeframe I have experienced several hurricanes and evacuations from my home in Ramrod key to mainland Florida. The furthest I have evacuated to is Winter Haven (Hurricane Irma 2017). The closest is Fort Lauderdale (numerous times in 2004 and 2005).

By far, the most difficult and dangerous part of evacuation is the traffic congestion north of Monroe County, starting in Miami-Dade/ Dade County.

I am a certified Monroe County CERT member for 2023. I have watched a recent presentation given by NOAA KEY WEST NWS on hurricane tracking, historical analysis of storms, tools used, hurricane preparedness and planning.

It concerns me that for all the planning we do in Monroe County, our evacuation efforts are thwarted if your counterparts and designated hurricane emergency management personnel from Dade, broward and palm beach counties are not on the same page and do not take into account the dense populations in those counties that are also taking to the highways at the same time.

We cannot allow changes to the evacuation model that compromise the safety of the residents of Monroe County.

We also cannot allow changes to the evacuation model that provide a loophole or possibility for more development in Monroe County when we are already at maximum carrying capacity in the Keys.

Revisions to evacuation model can not be used to justify increased development in Monroe County.

We are at maximum carrying capacity for Monroe County. Check with Florida Keys Aqueduct Authority FKAA (executive director Greg Veliz) for the latest (2023) on their inability to manage our water usage requirements and our sewage treatment requirements. The water supply infrastructure is old and compromised. The wastewater and sewage treatment facilities are relatively new (the Cudjoe Key wastewater treatment facility is approx 7 yrs) but they were poorly designed and cannot handle the volumes of increased population density, sea level rise and storms.

Thank you for considering my comments.

Shirley Gun
573 Indies Rd, Ramrod Key, FL 33042

From: Office of Long-Term Resiliency
To: FLKeysEvac
Subject: FW: [EXTERNAL] - Do NOT change the evacuation procedures
Date: Tuesday, June 13, 2023 2:55:24 PM

Please see below.

Thank you,

Keon Scott
Constituent Management Services Analyst/Office Of Long-Term Resiliency
CMS@deo.myflorida.com

Florida Department of Economic Opportunity
Office: 850-717-8432 |Keon.Scott@deo.myflorida.com
www.FloridaJobs.org

-----Original Message-----
From: Tomas Vickerman <tomasvickerman@msn.com>
Sent: Tuesday, June 13, 2023 2:02 PM
To: Office of Long-Term Resiliency <cdbg-dr@deo.myflorida.com>
Subject: [EXTERNAL] - Do NOT change the evacuation procedures

Just so developers can build down here. Keep our safety higher!

Sent from my iPhone

From: Office of Long-Term Resiliency
To: FLKeysEvac
Subject: FW: [EXTERNAL] - Do not to play "funny math" with our lives!
Date: Monday, June 26, 2023 3:13:35 PM

Please see below.

From: Amylachatlynch <amylachatlynch@aol.com>
Sent: Sunday, June 25, 2023 11:40 AM
To: Office of Long-Term Resiliency <cdbg-dr@deo.myflorida.com>
Subject: [EXTERNAL] - Do not to play "funny math" with our lives!

To whom it may concern in the DEO,

My family and I have lived and worked in Key West for more than 30 years.
Our income in generated by tourism and real estate.
We depend upon a healthy economy.
We see and acknowledge the issues with affordable housing.

HOWEVER,
WE DO NOT SUPPORT MORE ROGOs for the Keys.
Playing with the hurricane evacuation numbers to allow more building is not the solution;
it is putting our lives at risk.
Please don't allow it.

Sincerely,

Amy Lachat Lynch
Key West, FL

From:	Office of Long-Term Resiliency
To:	FLKeysEvac
Subject:	FW: [EXTERNAL] - evacuation of Florida Keys -- 24 hours
Date:	Monday, June 12, 2023 1:40:02 PM
Attachments:	EXTERNAL - Hurricane evacuation plans for Monroe County .msg EXTERNAL - Florida Keys Hurricane Evacuation Modeling.msg EXTERNAL - .msg EXTERNAL - Hurricane evacuation.msg EXTERNAL - Evacuation times in the keys.msg EXTERNAL - The Beautiful Keys.msg EXTERNAL - Hurricane Evacuation.msg EXTERNAL - Evacuation and false information.msg image002.png image003.png image004.png image005.png

Please see below and attached email regarding the Florida Keys Evacuation process.

Thank you,

Constituent Management Services Team/Office Of Long-Term Resiliency
CMS@deo.myflorida.com

Florida Department of Economic Opportunity
Office: 850-717-8404
www.FloridaJobs.org

From: jastarr789@gmail.com <jastarr789@gmail.com>
Sent: Monday, June 12, 2023 1:29 PM
To: Office of Long-Term Resiliency <cdbg-dr@deo.myflorida.com>
Subject: [EXTERNAL] - evacuation of Florida Keys -- 24 hours

Good afternoon, Department of Economic Opportunity, Division of Community Development,

In the interests of public health and safety, I urge you to ensure that the present minimum time frame for evacuation of the Florida Keys remains in place. In fact, increasing this time may be helpful to ensure that all residents and numerous guests can safely leave prior to an anticipated storm event.

Please keep this in mind in regard to considering economic opportunity and necessary evacuation time. (Plus, development should be planned with consideration of the fragile environment in which the Keys exists.)

Again, please bear in mind the need for public health and safety in considering the minimum time needed for safe evacuation.

Thank you for your time and consideration.

Respectfully,

Judy Starr
Islamorada, Florida

From:	Office of Long-Term Resiliency
To:	FLKeysEvac
Subject:	FW: [EXTERNAL] - evacuation of Florida Keys -- 24 HOURS IS WHERE IT SHOULD REMAIN (Addendum to previous email)
Date:	Wednesday, June 14, 2023 9:38:38 AM
Attachments:	image002.png image003.png image004.png image005.png

Please see below.

Thank you,

Keon Scott
Constituent Management Services Analyst/Office Of Long-Term Resiliency
CMS@deo.myflorida.com

Florida Department of Economic Opportunity
Office: 850-717-8432 |Keon.Scott@deo.myflorida.com
www.FloridaJobs.org

From: jastarr789@gmail.com <jastarr789@gmail.com>
Sent: Tuesday, June 13, 2023 10:17 PM
To: Office of Long-Term Resiliency <cdbg-dr@deo.myflorida.com>
Subject: [EXTERNAL] - evacuation of Florida Keys -- 24 HOURS IS WHERE IT SHOULD REMAIN (Addendum to previous email)

Addendum: Having re-read my email to you (below), please bear in mind that if you believe that any increase in evacuation time would provide a valid rationale to enable greater development, you must also bear in mind the following points in regard to the limits on the amount of growth the Keys can bear:

1. Limited Water Supply
2. Limited capacity of U.S. 1
3. Limit to wastewater capacity
4. Runoff from developed and/or impervious surfaces
5. Fragile habitat, threatened flora and wildlife species.

Nothing I wrote previously was intended to support increased development – on the contrary: the Keys cannot bear it.

Thank you again for your time and consideration.

Respectfully,

Judy Starr
Islamorada, Florida Keys

From: jastarr789@gmail.com <jastarr789@gmail.com>
Sent: Monday, June 12, 2023 1:29 PM
To: cdbg-dr@deo.myflorida.com
Subject: evacuation of Florida Keys -- 24 hours PLS SEE ADDENDUM ABOVE: **KEYS MUST LIMIT DEVELOPMENT**

Good afternoon, Department of Economic Opportunity, Division of Community Development,

In the interests of public health and safety, I urge you to ensure that the present minimum time frame for evacuation of the Florida Keys remains in place. In fact, increasing this time may be helpful to ensure that all residents and numerous guests can safely leave prior to an anticipated storm event.

Please keep this in mind in regard to considering economic opportunity and necessary evacuation time. (Plus, development should be planned with consideration of the fragile environment in which the Keys exists.)

Again, please bear in mind the need for public health and safety in considering the minimum time needed for safe evacuation.

Thank you for your time and consideration.

Respectfully,

Judy Starr
Islamorada, Florida

From:	Office of Long-Term Resiliency
To:	FLKeysEvac
Subject:	FW: [EXTERNAL] - Hurricane Evacuation
Date:	Tuesday, June 13, 2023 10:38:47 AM
Attachments:	EXTERNAL - Comments on 2023 meetings - Update of the Hurricane Evacuation Model.msg image002.png image003.png image004.png image005.png

Please see attached.

Thank you,

Keon Scott
Constituent Management Services Analyst/Office Of Long-Term Resiliency
CMS@deo.myflorida.com

Florida Department of Economic Opportunity
Office: 850-717-8432 |Keon.Scott@deo.myflorida.com
www.FloridaJobs.org

From: Shelly Krueger <gt6657b@gmail.com>
Sent: Tuesday, June 13, 2023 10:06 AM
To: Office of Long-Term Resiliency <cdbg-dr@deo.myflorida.com>
Subject: [EXTERNAL] - Hurricane Evacuation

It is vital that we have enough time to evacuate the Keys. Even 24 or 48 hours is not enough. If Miami is evacuated, and then the hurricane turns and requires Monroe Co to evacuate, we will literally all be sitting ducks on the highways because there will be absolute gridlock between here and Miami. For Hurricane Irma, I evacuated on the Tuesday before the Sunday landfall. I was able to easily evacuate from the Keys, but starting around Bradenton it was chaos because they were evacuating those barrier islands. After passing through Bradenton/Tampa area -- we sat in traffic near Ocala and Gainesville for HOURS. These storms are larger and develop into stronger winds quickly. We have one way out -- if there is a major evacuation occurring anywhere else in Florida, the Keys residents are basically trapped in our cars.

Shelly K
Key West, FL

From: Office of Long-Term Resiliency
To: FLKeysEvac
Subject: FW: [EXTERNAL] - Hurricane evacuation
Date: Monday, June 12, 2023 2:44:28 PM
Attachments: image002.png
image003.png
image004.png
image005.png

Please see below.

Constituent Management Services Team/Office Of Long-Term Resiliency
CMS@deo.myflorida.com

Florida Department of Economic Opportunity
Office: 850-717-8404
www.FloridaJobs.org



From: Nelson Kelly <hapyst.patricksday@gmail.com>
Sent: Monday, June 12, 2023 1:40 PM
To: Office of Long-Term Resiliency <cdbg-dr@deo.myflorida.com>
Subject: [EXTERNAL] - Hurricane evacuation

The rules that are in effect for hurricane evacuation were placed by intelligent people that cared about Homeowners and visitors safety and should not be watered down because developers/Real Estate people want to make money at our personal safety Please do not weaken Hurricane evacuation standards to satisfy profit interest groups. Nelson Kelly Long time visitor to the Keys Paradise.

From: Office of Long-Term Resiliency
To: FLKeysEvac
Subject: FW: [EXTERNAL] - Just Say NO to Increased Hurricane Risk
Date: Thursday, June 15, 2023 10:38:52 AM

Please see below.

Thank you,

Keon Scott
Constituent Management Services Analyst/Office Of Long-Term Resiliency
CMS@deo.myflorida.com

Florida Department of Economic Opportunity
Office: 850-717-8432 |Keon.Scott@deo.myflorida.com
www.FloridaJobs.org

-----Original Message-----
From: Denise Meehan <deemeehan@aol.com>
Sent: Wednesday, June 14, 2023 2:58 PM
To: Office of Long-Term Resiliency <cdbg-dr@deo.myflorida.com>
Subject: [EXTERNAL] - Just Say NO to Increased Hurricane Risk

Dear Department of Economic Opportunity~

I understand you are seeking public input on the hurricane evacuation model for the Florida Keys. Because I believe we are already past the "tipping point" for safe evacuation of all visitors and residents, I am writing to encourage you to halt further development throughout the Keys.

As a permanent resident of the Lower Keys since 2012, and having experienced Hurricane Irma, I am convinced that the Keys are "built out" and any further development will add additional stress to our already overtaxed infrastructure and increase the risk that visitors and permanent residents may not be able to evacuate in time. When you add rapid intensification, a phenomenon that is occurring more and more frequently, the possibility of being trapped by a rapidly moving rapidly intensifying storm is a very real scenario. When a storm changes track at the last minute, as did Hurricane Ian, you just don't have the luxury of a tiered evacuation.

My 88-year-old mother lives in Bonita Springs. It was sheer luck that we were visiting her in our RV when Hurricane Ian decided to rapidly intensify and head south instead of toward Tampa. When her area came under mandatory evacuation (less than 48 hours before Ian arrived, never mind the arrival of storm force winds) we hurried to close up her house and help her leave. We headed across I-75 in tropical storm force winds along with thousands of other people. Rest areas were packed solid. We were forced to overnight in one because reservations in unaffected areas were not available. And the mainland has many evacuation routes. The Keys have only one. I cannot imagine how my mother would have coped with that had we not been there for her. If such a scenario as Ian happened in the Keys, entrapment is already highly likely for some, especially those like my elderly mother who need help to evacuate. Add to that the fact that while Keys visitors are required to leave 48 hours ahead of arrival of tropical storm force winds, many don't. Sure, the hotels clear out, but what about the private rentals? No authority oversees the evacuation of Airbnb and similar such properties. Northerners who aren't really well versed in the dangers a hurricane pose may be tempted to "wait and see" rather than leave as required. With rising property costs pricing out potential residents in favor of investors, we are seeing more of these types of units as well. Where does

that leave us? With possibly thousands of people unaccounted for in the evacuation scenarios who don't evacuate until the last minute, making it even harder for everyone else to evacuate safely.

FKAA has already admitted it can't keep up with the demand for water. You can't drive through Big Pine or Islamorada half the time without getting stuck in traffic, summer or winter. Summer rentals are more and more popular, increasing the numbers of people likely to be in the Keys during hurricane season. Enough is enough.

If you really want to come up with a realistic plan for safe evacuation, why not update the current evacuation model to include ALL of our permanent residents like our Navy base personnel and their families (approximately 5,200 persons), live-aboard boaters, mobile home residents, and residents of the hundreds of recently constructed housing units? Then fold in the percentage of private rental visitors who ignore early evacuation requirements. Then think about rapid intensification and potential for change of course. Then put yourself down on Cudjoe Key, where I live, or even farther South, and think about whether or not YOU could get out safely. Both Hurricane Irma and Hurricane Ian experienced rapid intensification and altered course shortly before making landfall. How many more wake-up calls do we need?

Thank you for considering my thoughts on this matter.

Denise Meehan
701 Spanish Main Drive #244
Cudjoe Key FL 33042
deemeehan@aol.com
201.787.5926

From: Office of Long-Term Resiliency
To: FLKeysEvac
Subject: FW: [EXTERNAL] - Make Public Safety a PRIORITY!
Date: Monday, June 26, 2023 2:45:09 PM

Please see below.

From: Maryann Matter <ma@a2zmatter.com>
Sent: Saturday, June 24, 2023 7:35 AM
To: Office of Long-Term Resiliency <cdbg-dr@deo.myflorida.com>
Subject: [EXTERNAL] - Make Public Safety a PRIORITY!

My name is Mary Ann Matter and I am a fulltime resident and property owner at 1309 Elizabeth Street in Key West. I have witnessed the continued growth of our tiny island over the past four decades. Development and population have exceeded our infrastructure capacity and puts *public safety at risk.* There is NO GOOD JUSTIFICATION for allowing more growth! Greed seems to be the motivator. Our water supply is failing, our sewage system is overwhelmed, our evacuation route is no longer safe, enforcement of “early” evacuations (as an excuse for more building) is ludicrous, and the current model does not reflect reality. ENOUGH ALREADY!!!!

Thank you,

Mary Ann Matter
1309 Elizabeth St
Key West, FL
33040

From:	Office of Long-Term Resiliency
To:	FLKeysEvac
Subject:	FW: [EXTERNAL] - No additional ROGOs for the keys! Do not put us in jeopardy!
Date:	Thursday, July 6, 2023 3:57:12 PM

Please see below

From: Kelly Cummings <kelly.cummings.001@gmail.com>
Sent: Friday, June 30, 2023 5:41 PM
To: Office of Long-Term Resiliency <cdbg-dr@deo.myflorida.com>
Cc: Kelly Cummings <kelly.cummings.001@gmail.com>
Subject: [EXTERNAL] - No additional ROGOs for the keys! Do not put us in jeopardy!

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Please do not create a new "formula" to some how grant additional ROGO permits.

We have serious concerns about our ability to safely evacuate.

Everyone knows that by adding unenforceable restrictions to future allocations like those granted by Mr. Scott (affordable units leave ahead of hurricane event…except that these are the actual workers that will need to be working to secure the businesses, etc).will only make our ability to evacuate the keys impossible.

Please stop the madness. Please begin a real dialogue which is focused on buying vacant properties. State funds are needed.

Stand up to the developers! We can barely get around because the traffic is too terrible.

Respectfully,

Kelly A. Cummings

From: Office of Long-Term Resiliency
To: FLKeysEvac
Subject: FW: [EXTERNAL] - No more Florida Keys Growth
Date: Monday, June 26, 2023 3:14:02 PM

Please see below.

From: Jerald O'Cathey <outlook_E113E712D535E4F6@outlook.com>
Sent: Monday, June 26, 2023 1:40 AM
To: Office of Long-Term Resiliency <cdbg-dr@deo.myflorida.com>
Subject: [EXTERNAL] - No more Florida Keys Growth

January 24, 2023 The Honorable Ron DeSantis, Governor Ashley Moody, Attorney General Jimmy Patronis, Chief Financial Officer Wilton Simpson, Commissioner of Agriculture and Consumer Service Meredith Ivey, Acting Secretary, Department of Economic Opportunity Jim Zingale, Executive Director, Department of Revenue Barbara Leighty, Governor's Office of Policy and Budget Re: Florida Keys – Please Don't Increase Our Hurricane Vulnerability Greetings: We write to you on behalf of our thousands of members in the Florida Keys about unsafe hurricane evacuation. We need your help. There is only one road out of the Keys to escape a hurricane. Too many cars on the road trying to evacuate create a terrible safety risk. This causes many residents not to evacuate, yet the single evacuation route is still highly congested. And that makes it very dangerous. Rapid intensification or a simple wobble in the hurricane path further increases the number of last-minute evacuations, adding to the already dangerous congestion on our one-road-to-safety. And we see from Hurricane Ian how dangerous it can be for people who don't or can't evacuate. To avoid these dangers, Florida law, 1 as well as agreements (MOU)2 which the Department of Economic Opportunity (DEO), all municipalities, and Monroe County have signed, restrict permanent residential growth in the Florida Keys to that which can be evacuated in 24 hours. Yet, despite the dangers, some developers and some local officials are now trying to change the hurricane evacuation statute to allow additional residential growth, regardless of the risks to our residents and visitors alike. 1 Section 380.0552 (9) (a)2, Florida Statutes. 2 "Following the direction of the Governor and Cabinet, seated as the Administration Commission, a Memorandum of Understanding was drafted to address the input variables and assumptions to depict hurricane evacuation clearance time for the Florida Keys. The draft Memorandum of Understanding was the result of four workshops that were organized by the Department and included representatives from each local government in the Florida Keys, several federal and state agencies such as the National Hurricane Center, Florida Division of Emergency Management, and the South Florida Regional Planning Council, and various members of the Keys communities." From DEO website. In 2018, these interests convinced former Governor Rick Scott to order DEO to add an additional 1300 rate of growth allocations (ROGOS) to the Florida Keys, denominated affordable housing, and requiring (without enforcement!) early evacuation by residents of these new buildings. This was directly contrary to §380.0552(9)(a)2, Fla. Statutes, and the MOU which DEO and all local governments had signed. The existing ROGOs allow for yearly growth that would not exceed the 24-hour evacuation limit. The Third District Court of Appeal recently ruled that the 1300 additional ROGOs former Governor Scott had ordered are illegal; it overturned the award. The Supreme Court of Florida recently declined to review that opinion. Now, some local officials and developers are trying to convince the legislature to change the hurricane evacuation statute to enable even more residential growth in excess of the cap set by law. These

interests have indicated to the press that DEO is in agreement with them about changing the evacuation statute and the MOU. But that statement is not based on any publicly available facts. Former Governor Scott ordered the DEO to award the 1300 additional ROGOs, violating §380.0552(9)(a)2, not you or DEO under your administration. On the contrary, DEO in your administration did not intervene in support of the additional ROGOS in the judicial process and has made no public statement of which we are aware claiming it supports the local officials' and developers' efforts to change the law. The Florida Keys are an Area of Critical Concern. The 24-hour evacuation statute and the accompanying MOU are also intended to limit residential growth because of the restrictions of the carrying capacity of the Keys, including the water quality of the Florida Keys National Marine Sanctuary surrounding them. The carrying capacity of the Keys also requires hurricane evacuation limitations and the need to maintain traffic flow at no less than 45 miles per hour on U.S. Highway One. Traffic flow is currently at 45.5, even without the proposed additional residential growth. DEO is in the process of assembling data to run the hurricane model as required by the MOU. However, this exercise likely will not be completed within the next six months. No changes should be made to the hurricane evacuation statute until the results of the most recent hurricane model are available, and then, only if the model results show that the MOU and the hurricane evacuation statute permit such changes. We don't believe you or your administration are in favor of changing the law which will increase the hazards of hurricane evacuations. Your leadership in making known your administration's support for the MOU previously signed and for the existing 24-hour hurricane evacuation statute are crucial to the safety of those of us in the Florida Keys. Thank you, Ann Olsen, FOLKs Spokesperson cc: Ben Melnick, Deputy Secretary DEO; Kate Doyle, Asst Deputy Secretary, DEO; James Stansbury, Bureau Chief, DEO; Barbara Powell, Assistant Bureau Chief, Division of Community Planning, Dept. of Economic Opportunity Representative Jim Mooney Senator Ana Maria Rodriquez Monroe County BOCC: Mayor Craig Cates, David Rice, Michelle Lincoln, Jim Scholl, Holly Raschein
Sent from Mail for Windows

From: Office of Long-Term Resiliency
To: FLKeysEvac
Subject: FW: [EXTERNAL] - NO new ROGOs for the Keys!
Date: Monday, June 26, 2023 2:46:19 PM

Please see below.

-----Original Message-----
From: Hermine Zavar <hcz15@aol.com>
Sent: Saturday, June 24, 2023 11:35 AM
To: Office of Long-Term Resiliency <cdbg-dr@deo.myflorida.com>
Subject: [EXTERNAL] - NO new ROGOs for the Keys!

The Keys are already over capacity. Please stop putting our lives at risk by allowing more new building in the Keys.
Public safety needs to be placed above more development!

Regards,
Mrs. Hermine C. Zavar
Lower Matecumbe Key
Islamorada, FL 33036

Sent from my iPad

From:	Office of Long-Term Resiliency
To:	FLKeysEvac
Subject:	FW: [EXTERNAL] - No new ROGOs for the Keys. Please protect the existing residents.
Date:	Monday, June 26, 2023 2:46:31 PM

Please see below.

From: Janice Hartz <drjanhartz@gmail.com>
Sent: Saturday, June 24, 2023 4:59 PM
To: Office of Long-Term Resiliency <cdbg-dr@deo.myflorida.com>
Subject: [EXTERNAL] - No new ROGOs for the Keys. Please protect the existing residents.

It's time to stop putting lives at risk by allowing more new building in the Keys.
I live in Key Largo, and we are already over capacity. It's dangerous at times to try to enter US 1 from my Pirates Cove neighborhood (of over 300 homes). Two lane traffic flows at us, often going bumper to bumper at least 55 mph in a 45 mph zone. We have to make a sharp right turn onto our hometown street, US 1, that runs through the middle of all of our neighborhoods up and down the Keys. It has become like a super Highway, but with no merge lane. In the past couple years, there have been multiple traffic accident deaths. And several times a week now, routinely there are bad or fatal accidents which shut down our only road. Other times the roads are so clogged that the traffic flows very slowly bumper to bumper. A trip to a nearby grocery store can take a very long time.
I have owned my home here for 37 years. It has become newly overcrowded, especially in the last few years
Our water system is over capacity and often breaks down.
You will be putting our lives at risk if you allow more development. We do not have the infrastructure for this and it would endanger our lives in a hurricane.
Evacuating in a hurricane is already beyond difficult with our one main road.
The assumption that you can get some designated categories of people to evacuate early is also wrong. Our neighborhoods have become full of vacation renters over the past few years. Many renters pay no attention to any local rules. They put their garbage often in resident neighbors' trash cans. They do not pick up dog poop. They let their young children drive golf carts recklessly at high speed through our 15 mph neighborhoods. They play music super loudly often way past midnight. The idea that they would all comply with an early evacuation order is a wrong assumption when they do not even comply with simple decent rules of a community.
Respectfully,

Jan Hartz
Key Largo

Sent from my iPhone

From: Office of Long-Term Resiliency
To: FLKeysEvac
Subject: FW: [EXTERNAL] - No New ROGOs in the Keys
Date: Monday, June 26, 2023 2:46:10 PM

Please see below.

From: tony marra <tonytke@yahoo.com>
Sent: Saturday, June 24, 2023 11:07 AM
To: Office of Long-Term Resiliency <cdbg-dr@deo.myflorida.com>
Subject: [EXTERNAL] - No New ROGOs in the Keys

Please.
No New ROGOs in the Keys .

Tony Marra
tonytke@yahoo.com

From: Office of Long-Term Resiliency
To: FLKeysEvac
Subject: FW: [EXTERNAL] - No New ROGO"s!
Date: Monday, June 26, 2023 2:45:41 PM

Please see below.

From: Cheryl R <scubaqueen1@gmail.com>
Sent: Saturday, June 24, 2023 9:59 AM
To: Office of Long-Term Resiliency <cdbg-dr@deo.myflorida.com>
Subject: [EXTERNAL] - No New ROGO's!

I am a concerned citizen. It's time to stop putting lives at risk by allowing more new building in the Florida Keys. We are already at capacity! Do not approve any new ROGOs.

Sincerely,
Cheryl Rollings
1410 Duncan St, Key West, FL 33040

From:	Office of Long-Term Resiliency
To:	FLKeysEvac
Cc:	Domer, Justin; Garcia, Leo
Subject:	FW: [EXTERNAL] - overbuilt
Date:	Tuesday, June 13, 2023 10:01:23 AM
Attachments:	EXTERNAL - Hurricane evacuation concerns .msg EXTERNAL - Hurricane Evacuation Modeling .msg image002.png image003.png image004.png image005.png

Good Morning Team,

Please see below and attached.

Thank you,

Keon Scott
Constituent Management Services Analyst/Office Of Long-Term Resiliency
CMS@deo.myflorida.com

Florida Department of Economic Opportunity
Office: 850-717-8432 | Keon.Scott@deo.myflorida.com
www.FloridaJobs.org

From: Paul <tailhunterone@aol.com>
Sent: Monday, June 12, 2023 7:02 PM
To: Office of Long-Term Resiliency <cdbg-dr@deo.myflorida.com>
Subject: [EXTERNAL] - overbuilt

The following is MY OPINION, the keys has been built out since before the year 2000 and then around 2008 the powers that be started using their (ways) to start changing the code and zoning laws and tweaking the densities to allow the big builders to gain a foothold in our community and set legal precedence. We have less than 5% of our living reefs left and they still have the build, build, build mentality of corporate America. They want fast real estate money you do not have to work that hard for. Just destroy the environment. Personal opinion

From: Office of Long-Term Resiliency
To: FLKeysEvac
Subject: FW: [EXTERNAL] - Re: Florida Keys Hurricane Evacuation Modeling
Date: Friday, June 16, 2023 9:47:05 AM
Attachments: image002.png
image003.png
image004.png
image005.png

Please see below.

Thank you,

Keon Scott
Constituent Management Services Analyst/Office Of Long-Term Resiliency
CMS@deo.myflorida.com

Florida Department of Economic Opportunity
Office: 850-717-8432 | Keon.Scott@deo.myflorida.com
www.FloridaJobs.org



From: Marlies Tumolo <marliestumolo@gmail.com>
Sent: Thursday, June 15, 2023 7:04 PM
To: Office of Long-Term Resiliency <cdbg-dr@deo.myflorida.com>
Subject: [EXTERNAL] - Re: Florida Keys Hurricane Evacuation Modeling

To Whom it May Concern,

After hearing your presentation at the public meetings I had a few additional comments that I wanted to share. The presentation mentioned that the model assumed 100% of visitors and 90% of residents would evacuate for a category 5 storm. Given the amount of visitors in the Keys each each exceeds 5 million trips it seems unlikely that 100% would evacuate, especially when we consider that there are a plethora of illegal rentals in the Keys. Additionally many residents choose not to evacuate. In addition to emergency evacuation and safety concerns, granting 3,550 new residential building permit allocations will put additional strain on our aging systems, liek our water delivery, and detrimentally impact our environment and quality of life in the Florida Keys. I appreciate the opportunity to provide comments.

Best,
Marlies Tumolo
Key Largo Resident

On Sun, Jun 11, 2023 at 4:47 PM Marlies Tumolo <marliestumolo@gmail.com> wrote:

> To whom it may concern,
>
> As a full time resident of Key Largo I have concerns about the current evacuation modeling which does not include visitors and tourists, vacation rentals, Navy families or those living in Mobil homes or liveaboards. The model should take all these additional people into consideration. The Florida Keys are overwhelmed with people and overdeveloped. This makes evacuating challenging at best and more likely dangerous. Please ensure that any updates models take all these additional people into consideration and make it safe for everyone to be able to leave in time when a storm approaches. The National Weather Service has stated that they have a hard time predicting rapid intensification of storms and as this happens more frequently the ability to safety evacuate is even more critical. Please take this into consideration and put our safety over additional development.
>
> Thank you for the opportunity to provide my comments.
>
> Best,
> Marlies Tumolo
> Key Largo Resident
> --
> Marlies Kirsten Tumolo
> M.Ed. Curriculum and Instruction
> marliestumolo@gmail.com

--
Marlies Kirsten Tumolo
M.Ed. Curriculum and Instruction
marliestumolo@gmail.com

From: Office of Long-Term Resiliency
To: FLKeysEvac
Subject: FW: [EXTERNAL] - Stop Building
Date: Thursday, June 29, 2023 3:51:14 PM

Please see below.

From: c0nchs <c0nchs@aol.com>
Sent: Thursday, June 29, 2023 3:38 PM
To: Office of Long-Term Resiliency <cdbg-dr@deo.myflorida.com>
Subject: [EXTERNAL] - Stop Building

Subject: ENOUGH! No new ROGOs for the Keys.
My family and I are concerned, we're already beyond capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.
I can't be the only one with the mindset that there will never be enough. The more that is built the more people will come. I am here because this is where I was born.
I honestly do not believe, even at this point that we will be able to safely evacuate, not if, but when it becomes necessary.
Respectfully,
Louis and Susan Whidden

From: Office of Long-Term Resiliency
To: FLKeysEvac
Subject: FW: [EXTERNAL] - STOP overdevelopment in the Keys
Date: Monday, June 26, 2023 2:46:00 PM

Please see below.

From: Karen McCarthy <kmdrgnldy@aol.com>
Sent: Saturday, June 24, 2023 10:21 AM
To: Office of Long-Term Resiliency <cdbg-dr@deo.myflorida.com>
Subject: [EXTERNAL] - STOP overdevelopment in the Keys

ENOUGH! No new ROGOs for the Keys.

We're concerned, we're already at capacity, and it's time to stop putting lives at risk by allowing more new building in the Keys.

Respectfully,

Karen McCarthy
3524 Sunrise Dr
Key West, FL 33040

From: Office of Long-Term Resiliency
To: FLKeysEvac
Subject: FW: [EXTERNAL] - Time to stop! No new ROGO"s
Date: Monday, June 26, 2023 2:45:31 PM

Please see below.

From: Cheryl R <scubaqueen1@gmail.com>
Sent: Saturday, June 24, 2023 9:58 AM
To: Office of Long-Term Resiliency <cdbg-dr@deo.myflorida.com>
Subject: [EXTERNAL] - Time to stop! No new ROGO's

I am a concerned citizen. It's time to stop putting lives at risk by allowing more new building in the Florida Keys. We are already at capacity! Do not approve any new ROGOs.

Sincerely,
Cheryl Rollings
1410 Duncan St, Key West, FL 33040

From: Ivey, Meredith
To: David Turner
Cc: FLKeysEvac
Subject: RE: [EXTERNAL] - Meeting
Date: Wednesday, June 14, 2023 5:44:34 PM
Attachments: image002.png
image003.png
image004.png
image005.png

Hi David,

It was a true pleasure meeting with you and your team. We looked forward to continued collaboration on this process.

Thank you,

Meredith Ivey

Florida Department of Economic Opportunity
Office: 850-245-7153
Email: Meredith.Ivey@deo.myflorida.com
www.FloridaJobs.org



From: David Turner <cityadministrator@keycolonybeach.net>
Sent: Wednesday, June 14, 2023 10:27 AM
To: Ivey, Meredith <Meredith.Ivey@deo.myflorida.com>
Subject: [EXTERNAL] - Meeting

Morning Secretary Ivey,
Thank you for hosting and inviting Key Colony Beach to meet in person!
Very impressed with your team.
I received great feedback from 3 of my Commission who attended and of course my total support. If I can be of further assistance please reach out to me, my cell phone is the quickest response.
As we discussed after the public meeting I will work with my staff to help educate my community on the abc's of evacuation during an event.

Thank you
Dave Turner
City Administrator
City of Key Colony Beach
305.849.0273 cell
305.289.1212 ext.2

Please Note: Florida has a very broad public records law. Most written communication to or from the City are public records, and are available to the public and media upon request. Your email communications, including your email address, may therefore be subject to public disclosure. If you have received this email in error, please notify the City immediately by telephone or return email.

From:	Dr. Jonathan Gueverra
To:	Domer, Justin; FLKeysEvac; Rachel Oropeza
Cc:	Powell, Barbara; Valdez, Yazmin
Subject:	RE: [EXTERNAL] - RE: DEO hearings
Date:	Tuesday, June 20, 2023 9:48:17 PM
Attachments:	image002.png image003.png image004.png image005.png image006.png image007.png

Mr. Domer:

Thank you. I hope that some one considers this idea so that we can move us into the future for evacuation purposes. WE still think of evacuation as everyone who wants to leave getting in a car and driving out and there are better ways to do this if we give it some thought. Know that I am willing, able and ready to assist in the creation of any more efficacious plan. As home owner who lost more than 50% of out home and helped many to rebuild, I know we cannot afford the current models in use today.

Contact me any time about this and other issues,
jg

From: Domer, Justin <Justin.Domer@deo.myflorida.com>
Sent: Tuesday, June 20, 2023 1:54 PM
To: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>; FLKeysEvac <FLKeysEvac@deo.myflorida.com>
Cc: Powell, Barbara <Barbara.Powell@deo.myflorida.com>; Valdez, Yazmin <Yazmin.Valdez@deo.myflorida.com>
Subject: RE: [EXTERNAL] - RE: DEO hearings

EXTERNAL EMAIL. Think before you click.

Thank you, Dr. Gueverra. Sharing this with the evacuation team.

Justin R. Domer
Director, Office of Long-Term Resiliency

Florida Department of Economic Opportunity
Office: (850) 717-8415
Cell: (850) 491-1042
www.FloridaJobs.org

From: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Sent: Wednesday, June 14, 2023 5:17 PM
To: Domer, Justin <Justin.Domer@deo.myflorida.com>
Subject: [EXTERNAL] - RE: DEO hearings

Other Approaches to Hurricane Evacuation

The Keys and the rest of Florida is in the midst of another hurricane season. There is nothing new about this scenario. Key West Sector Coast Guard and Naval Air Station Key West are also not new to the Keys. It is time that we consider these two entities as assets and not simply as guests or tenants in the county. Both entities possess and have access to assets that could reduce the considerable time and effort it takes for the residents of the Keys, particularly those of us in the Lower Keys and Key West to be evacuated in the event of a storm. Not everyone needs or desires to drive out of the county when there is a forced evacuation. Let me elaborate.

It is time that our policy makers consider our military partners as part of the solution to some of the local challenges. When the forecast indicates that a hurricane or tropical storm is imminent, our military partners are required to secure all of their assets including human and non-human assets. Non-essential personnel are typically evacuated and other assets are moved to alternate locations to preserve their value and integrity. This makes sense. What is incomprehensible is why our policy makers and the military are unable or unwilling to assist in the evacuation of non-military/civilians. In the aftermath of Hurricane Irma and Maria, our National Guard along with military units provided support for recovery operations. Here is a novel idea. Why don't we use these same systems to assist before the disaster strikes?

In the Key West area, could our leaders develop a "precheck" system that would allow individuals to be screened and registered for evacuation provided by military support? Prescreened residents would need to agree to meet at designated points either on a military installation or at some other location from where they will be transported to the installation for evacuation. It would be the responsibility of the evacuee to prearrange their support upon their transport out of the evacuation zone. Of course there are other details that would need to be ironed out and other challenges to overcome in order to implement such an initiative. Notwithstanding this, it changes the way we think about evacuating individuals and provides the equivalent of a mass transit approach to a problem that we have perennially seen as a private decision and personal problem.

From: Weiner-Shannon <Weiner-Shannon@MonroeCounty-FL.Gov>
Sent: Wednesday, June 14, 2023 2:50 PM
To: Justin.domer@deo.myflorida.com
Cc: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Subject: FW: DEO hearings

EXTERNAL EMAIL. Think before you click.

Hello Justin!
Please see below!

V/r

Shannon Davis Weiner, FPEM
Director| Monroe County | Emergency Management
490 63rd St. Ste 150 | Marathon, FL.
Office: 305.289.602 | Cell: 305.797.1167

From: Weiner-Shannon <Weiner-Shannon@MonroeCounty-FL.Gov>
Sent: Wednesday, June 14, 2023 9:18 AM
To: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Cc: meredith.ivey@deo.myflorida.com; justin.donner@deo.myflorida.com
Subject: RE: DEO hearings

EXTERNAL EMAIL. Think before you click.

Good day, Dr. Gueverra.

Please send your comments and feedback on the DEO hearings to Justin Donner, Director, Long Term Resiliency and Meredith Ivey, Secretary copied herein.

If you have any questions on local operations, do not hesitate to reach out to me.

V/r

Shannon Davis Weiner, FPEM
Director| Monroe County | Emergency Management
490 63rd St. Ste 150 | Marathon, FL.
Office: 305.289.602 | Cell: 305.797.1167

From: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Sent: Tuesday, June 13, 2023 5:23 PM
To: Weiner-Shannon <Weiner-Shannon@MonroeCounty-FL.Gov>
Subject: DEO hearings

...

> **CAUTION:** This email originated from outside of the County. Whether you know the sender or not, do not click links or open attachments you were not expecting.

Ms. Weiner:

Who may I send comments and suggestions to regarding the DEO hearings about evacuation plans?

jg
Jonathan Gueverra
President & CEO
305-809-3203

THE COLLEGE OF THE FLORIDA KEYS

5901 College Road | Key West, FL 33040 | www.CFK.edu

CFK's Marine Science & Technology Division is a 2021 Center of Excellence for Domestic Maritime Workforce Training and Education (CoE) designee by the U.S. Department of Transportation, Maritime Administration.

This email communication may contain confidential information protected from disclosure by privacy laws and is intended for the use of the individual named above. If the reader of this message is not the intended recipient, this is notice to you that any dissemination, distribution or copying of this communication or any attachment to it may be a violation of federal and state privacy laws. If you have received this email in error, please notify the sender immediately by return email and delete this message. Please note that Florida has a broad public records law, and that all correspondence to me via email may be subject to disclosure. Under Florida law email addresses are public records.

From:	Domer, Justin
To:	Dr. Jonathan Gueverra; FLKeysEvac
Cc:	Powell, Barbara; Valdez, Yazmin
Subject:	RE: [EXTERNAL] - RE: DEO hearings
Date:	Tuesday, June 20, 2023 1:54:07 PM
Attachments:	image004.png image005.png image006.png image007.png image008.png image009.png

Thank you, Dr. Gueverra. Sharing this with the evacuation team.

Justin R. Domer
Director, Office of Long-Term Resiliency

Florida Department of Economic Opportunity
Office: (850) 717-8415
Cell: (850) 491-1042
www.FloridaJobs.org

From: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Sent: Wednesday, June 14, 2023 5:17 PM
To: Domer, Justin <Justin.Domer@deo.myflorida.com>
Subject: [EXTERNAL] - RE: DEO hearings

Other Approaches to Hurricane Evacuation

The Keys and the rest of Florida is in the midst of another hurricane season. There is nothing new about this scenario. Key West Sector Coast Guard and Naval Air Station Key West are also not new to the Keys. It is time that we consider these two entities as assets and not simply as guests or tenants in the county. Both entities possess and have access to assets that could reduce the considerable time and effort it takes for the residents of the Keys, particularly those of us in the Lower Keys and Key West to be evacuated in the event of a storm. Not everyone needs or desires to drive out of the county when there is a forced evacuation. Let me elaborate.
It is time that our policy makers consider our military partners as part of the solution to some of the local challenges. When the forecast indicates that a hurricane or tropical storm is imminent, our military partners are required to secure all of their assets including human and non-human assets. Non-essential personnel are typically evacuated and other assets are moved to alternate locations to preserve their value and integrity. This makes sense. What is incomprehensible is why our policy makers and the military are unable or unwilling to assist in the evacuation of non-military/civilians. In the aftermath of Hurricane Irma and Maria, our National Guard along with military units provided

support for recovery operations. Here is a novel idea. Why don't we use these same systems to assist before the disaster strikes?
In the Key West area, could our leaders develop a "precheck" system that would allow individuals to be screened and registered for evacuation provided by military support? Prescreened residents would need to agree to meet at designated points either on a military installation or at some other location from where they will be transported to the installation for evacuation. It would be the responsibility of the evacuee to prearrange their support upon their transport out of the evacuation zone. Of course there are other details that would need to be ironed out and other challenges to overcome in order to implement such an initiative. Notwithstanding this, it changes the way we think about evacuating individuals and provides the equivalent of a mass transit approach to a problem that we have perennially seen as a private decision and personal problem.

From: Weiner-Shannon <Weiner-Shannon@MonroeCounty-FL.Gov>
Sent: Wednesday, June 14, 2023 2:50 PM
To: Justin.domer@deo.myflorida.com
Cc: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Subject: FW: DEO hearings

EXTERNAL EMAIL. Think before you click.

Hello Justin!
Please see below!

V/r

Shannon Davis Weiner, FPEM
Director| Monroe County | Emergency Management
490 63rd St. Ste 150 | Marathon, FL.
Office: 305.289.602 | Cell: 305.797.1167

From: Weiner-Shannon <Weiner-Shannon@MonroeCounty-FL.Gov>
Sent: Wednesday, June 14, 2023 9:18 AM

To: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Cc: meredith.ivey@deo.myflorida.com; justin.donner@deo.myflorida.com
Subject: RE: DEO hearings

EXTERNAL EMAIL. Think before you click.

Good day, Dr. Gueverra.

Please send your comments and feedback on the DEO hearings to Justin Donner, Director, Long Term Resiliency and Meredith Ivey, Secretary copied herein.

If you have any questions on local operations, do not hesitate to reach out to me.

V/r

Shannon Davis Weiner, FPEM
Director| Monroe County | Emergency Management
490 63rd St. Ste 150 | Marathon, FL.
Office: 305.289.602 | Cell: 305.797.1167

From: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Sent: Tuesday, June 13, 2023 5:23 PM
To: Weiner-Shannon <Weiner-Shannon@MonroeCounty-FL.Gov>
Subject: DEO hearings

...

CAUTION: This email originated from outside of the County. Whether you know the sender or not, do not click links or open attachments you were not expecting.

Ms. Weiner:

Who may I send comments and suggestions to regarding the DEO hearings about evacuation plans?

jg

Jonathan Gueverra
President & CEO
305-809-3203



THE COLLEGE OF THE FLORIDA KEYS

5901 College Road | Key West, FL 33040 | www.CFK.edu

CFK's Marine Science & Technology Division is a 2021 Center of Excellence for Domestic Maritime Workforce Training and Education (CoE) designee by the U.S. Department of Transportation, Maritime Administration.

From:	Dr. Jonathan Gueverra
To:	Ivey, Meredith
Cc:	FLKeysEvac; Powell, Barbara; Doyle, Kate; Wright, Valerie
Subject:	RE: [EXTERNAL] - RE: DEO hearings
Date:	Wednesday, June 14, 2023 7:48:10 PM
Attachments:	image002.png image003.png image004.png image005.png image006.png image007.png

Many thanks…

jg

From: Ivey, Meredith <Meredith.Ivey@deo.myflorida.com>
Sent: Wednesday, June 14, 2023 5:39 PM
To: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Cc: FLKeysEvac <FLKeysEvac@deo.myflorida.com>; Powell, Barbara <Barbara.Powell@deo.myflorida.com>; Doyle, Kate <Kate.Doyle@deo.myflorida.com>; Wright, Valerie <Valerie.Wright@deo.myflorida.com>
Subject: RE: [EXTERNAL] - RE: DEO hearings

EXTERNAL EMAIL. Think before you click.

Good evening Dr. Gueverra,

This email confirms receipt of your email.

Thank you,

Meredith Ivey

Florida Department of Economic Opportunity
Office: 850-245-7153
Email: Meredith.Ivey@deo.myflorida.com
www.FloridaJobs.org

From: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Sent: Wednesday, June 14, 2023 11:48 AM
To: Ivey, Meredith <Meredith.Ivey@deo.myflorida.com>
Subject: RE: [EXTERNAL] - RE: DEO hearings

Other Approaches to Hurricane Evacuation

The Keys and the rest of Florida is in the midst of another hurricane season. There is nothing new about this scenario. Key West Sector Coast Guard and Naval Air Station Key West are also not new to the Keys. It is time that we consider these two entities as assets and not simply as guests or tenants in the county. Both entities possess and have access to assets that could reduce the considerable time and effort it takes for the residents of the Keys, particularly those of us in the Lower Keys and Key West to be evacuated in the event of a storm. Not everyone needs or desires to drive out of the county when there is a forced evacuation. Let me elaborate.

It is time that our policy makers consider our military partners as part of the solution to some of the local challenges. When the forecast indicates that a hurricane or tropical storm is imminent, our military partners are required to secure all of their assets including human and non-human assets. Non-essential personnel are typically evacuated and other assets are moved to alternate locations to preserve their value and integrity. This makes sense. What is incomprehensible is why our policy makers and the military are unable or unwilling to assist in the evacuation of non-military/civilians. In the aftermath of Hurricane Irma and Maria, our National Guard along with military units provided support for recovery operations. Here is a novel idea. Why don't we use these same systems to assist before the disaster strikes?

In the Key West area, could our leaders develop a "precheck" system that would allow individuals to be screened and registered for evacuation provided by military support? Prescreened residents would need to agree to meet at designated points either on a military installation or at some other location from where they will be transported to the installation for evacuation. It would be the responsibility of the evacuee to prearrange their support upon their transport out of the evacuation zone. Of course there are other details that would need to be ironed out and other challenges to overcome in order to implement such an initiative. Notwithstanding this, it changes the way we think about evacuating individuals and provides the equivalent of a mass transit approach to a problem that we have perennially seen as a private decision and personal problem.

I am available if anyone wants to talk more about this and other different approaches.

jg
Jonathan Gueverra
President & CEO
305-809-3203

THE COLLEGE OF THE FLORIDA KEYS

5901 College Road | Key West, FL 33040 | www.CFK.edu

CFK's Marine Science & Technology Division is a 2021 Center of Excellence for Domestic Maritime Workforce Training and Education (CoE) designee by the U.S. Department of

From: Ivey, Meredith <Meredith.Ivey@deo.myflorida.com>
Sent: Wednesday, June 14, 2023 9:24 AM
To: Weiner-Shannon <Weiner-Shannon@MonroeCounty-FL.Gov>; Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Cc: justin.donner@deo.myflorida.com; FLKeysEvac <FLKeysEvac@deo.myflorida.com>
Subject: RE: [EXTERNAL] - RE: DEO hearings

EXTERNAL EMAIL. Think before you click.

Good morning Dr. Gueverra,

We look forward to receiving your feedback.

Thank you,

Meredith Ivey

Florida Department of Economic Opportunity
Office: 850-245-7153
Email: Meredith.Ivey@deo.myflorida.com
www.FloridaJobs.org

From: Weiner-Shannon <Weiner-Shannon@MonroeCounty-FL.Gov>
Sent: Wednesday, June 14, 2023 9:18 AM
To: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Cc: Ivey, Meredith <Meredith.Ivey@deo.myflorida.com>; justin.donner@deo.myflorida.com
Subject: [EXTERNAL] - RE: DEO hearings

Good day, Dr. Gueverra.

Please send your comments and feedback on the DEO hearings to Justin Donner, Director, Long Term Resiliency and Meredith Ivey, Secretary copied herein.

If you have any questions on local operations, do not hesitate to reach out to me.

V/r

Shannon Davis Weiner, FPEM
Director| Monroe County | Emergency Management
490 63rd St. Ste 150 | Marathon, FL.
Office: 305.289.602 | Cell: 305.797.1167

From: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Sent: Tuesday, June 13, 2023 5:23 PM
To: Weiner-Shannon <Weiner-Shannon@MonroeCounty-FL.Gov>
Subject: DEO hearings

...

CAUTION: This email originated from outside of the County. Whether you know the sender or not, do not click links or open attachments you were not expecting.

Ms. Weiner:

Who may I send comments and suggestions to regarding the DEO hearings about evacuation plans?

jg
Jonathan Gueverra
President & CEO
305-809-3203

5901 College Road | Key West, FL 33040 | www.CFK.edu

CFK's Marine Science & Technology Division is a 2021 Center of Excellence for Domestic Maritime Workforce Training and Education (CoE) designee by the U.S. Department of Transportation, Maritime Administration.

This email communication may contain confidential information protected from disclosure by privacy laws and is intended for the use of the individual named above. If the reader of this message is not the intended recipient, this is notice to you that any dissemination, distribution or copying of this communication or any attachment to it may be a violation of federal and state privacy laws. If you have received this email in error, please notify the sender immediately by return email and delete this message. Please note that Florida has a broad public records law, and that all correspondence to me via email may be subject to disclosure. Under Florida law email addresses are public records.

From: Ivey, Meredith
To: Dr. Jonathan Gueverra
Cc: FLKeysEvac; Powell, Barbara; Doyle, Kate; Wright, Valerie
Subject: RE: [EXTERNAL] - RE: DEO hearings
Date: Wednesday, June 14, 2023 5:39:04 PM
Attachments: image003.png
image004.png
image005.png
image006.png
image008.png
image009.png

Good evening Dr. Gueverra,

This email confirms receipt of your email.

Thank you,

Meredith Ivey

Florida Department of Economic Opportunity
Office: 850-245-7153
Email: Meredith.Ivey@deo.myflorida.com
www.FloridaJobs.org

From: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Sent: Wednesday, June 14, 2023 11:48 AM
To: Ivey, Meredith <Meredith.Ivey@deo.myflorida.com>
Subject: RE: [EXTERNAL] - RE: DEO hearings

Other Approaches to Hurricane Evacuation

The Keys and the rest of Florida is in the midst of another hurricane season. There is nothing new about this scenario. Key West Sector Coast Guard and Naval Air Station Key West are also not new to the Keys. It is time that we consider these two entities as assets and not simply as guests or tenants in the county. Both entities possess and have access to assets that could reduce the considerable time and effort it takes for the residents of the Keys, particularly those of us in the Lower Keys and Key West to be evacuated in the event of a storm. Not everyone needs or desires to drive out of the county when there is a forced evacuation. Let me elaborate.
It is time that our policy makers consider our military partners as part of the solution to some of the local challenges. When the forecast indicates that a hurricane or tropical storm is imminent, our military partners are required to secure all of their assets including human and non-human assets. Non-essential personnel are typically evacuated and other assets are moved to alternate locations to preserve their value and integrity. This makes sense. What is incomprehensible is why our policy makers and the military are unable or unwilling to assist in the evacuation of non-military/civilians. In

the aftermath of Hurricane Irma and Maria, our National Guard along with military units provided support for recovery operations. Here is a novel idea. Why don't we use these same systems to assist before the disaster strikes?
In the Key West area, could our leaders develop a "precheck" system that would allow individuals to be screened and registered for evacuation provided by military support? Prescreened residents would need to agree to meet at designated points either on a military installation or at some other location from where they will be transported to the installation for evacuation. It would be the responsibility of the evacuee to prearrange their support upon their transport out of the evacuation zone. Of course there are other details that would need to be ironed out and other challenges to overcome in order to implement such an initiative. Notwithstanding this, it changes the way we think about evacuating individuals and provides the equivalent of a mass transit approach to a problem that we have perennially seen as a private decision and personal problem.

I am available if anyone wants to talk more about this and other different approaches.

jg
Jonathan Gueverra
President & CEO
305-809-3203

THE COLLEGE OF THE FLORIDA KEYS

5901 College Road | Key West, FL 33040 | www.CFK.edu

CFK's Marine Science & Technology Division is a 2021 Center of Excellence for Domestic Maritime Workforce Training and Education (CoE) designee by the U.S. Department of Transportation, Maritime Administration.

From: Ivey, Meredith <Meredith.Ivey@deo.myflorida.com>
Sent: Wednesday, June 14, 2023 9:24 AM
To: Weiner-Shannon <Weiner-Shannon@MonroeCounty-FL.Gov>; Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Cc: justin.donner@deo.myflorida.com; FLKeysEvac <FLKeysEvac@deo.myflorida.com>
Subject: RE: [EXTERNAL] - RE: DEO hearings

EXTERNAL EMAIL. Think before you click.

Good morning Dr. Gueverra,

We look forward to receiving your feedback.

Thank you,

Meredith Ivey

Florida Department of Economic Opportunity
Office: 850-245-7153
Email: Meredith.Ivey@deo.myflorida.com
www.FloridaJobs.org

From: Weiner-Shannon <Weiner-Shannon@MonroeCounty-FL.Gov>
Sent: Wednesday, June 14, 2023 9:18 AM
To: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Cc: Ivey, Meredith <Meredith.Ivey@deo.myflorida.com>; justin.donner@deo.myflorida.com
Subject: [EXTERNAL] - RE: DEO hearings

Good day, Dr. Gueverra.

Please send your comments and feedback on the DEO hearings to Justin Donner, Director, Long Term Resiliency and Meredith Ivey, Secretary copied herein.

If you have any questions on local operations, do not hesitate to reach out to me.

V/r

Shannon Davis Weiner, FPEM
Director| Monroe County | Emergency Management
490 63rd St. Ste 150 | Marathon, FL.
Office: 305.289.602 | Cell: 305.797.1167

From: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>

Sent: Tuesday, June 13, 2023 5:23 PM
To: Weiner-Shannon <Weiner-Shannon@MonroeCounty-FL.Gov>
Subject: DEO hearings

...

> **CAUTION:** This email originated from outside of the County. Whether you know the sender or not, do not click links or open attachments you were not expecting.

Ms. Weiner:

Who may I send comments and suggestions to regarding the DEO hearings about evacuation plans?

jg
Jonathan Gueverra
President & CEO
305-809-3203

THE COLLEGE OF THE FLORIDA KEYS

5901 College Road | Key West, FL 33040 | www.CFK.edu

CFK's Marine Science & Technology Division is a 2021 Center of Excellence for Domestic Maritime Workforce Training and Education (CoE) designee by the U.S. Department of Transportation, Maritime Administration.

This email communication may contain confidential information protected from disclosure by privacy laws and is intended for the use of the individual named above. If the reader of this message is not the intended recipient, this is notice to you that any dissemination, distribution or copying of this communication or any attachment to it may be a violation of federal and state privacy laws. If you have received this email in error, please notify the sender immediately by return email and delete this message. Please note that Florida has a broad public records law, and that all correspondence to me via email may be subject to disclosure. Under Florida law email addresses are public records.

From:	Ivey, Meredith
To:	Weiner-Shannon; Dr. Jonathan Gueverra
Cc:	justin.donner@deo.myflorida.com; FLKeysEvac
Subject:	RE: [EXTERNAL] - RE: DEO hearings
Date:	Wednesday, June 14, 2023 9:24:30 AM
Attachments:	image004.png image005.png image006.png image007.png image008.png image009.png

Good morning Dr. Gueverra,

We look forward to receiving your feedback.

Thank you,

Meredith Ivey

Florida Department of Economic Opportunity
Office: 850-245-7153
Email: Meredith.Ivey@deo.myflorida.com
www.FloridaJobs.org

From: Weiner-Shannon <Weiner-Shannon@MonroeCounty-FL.Gov>
Sent: Wednesday, June 14, 2023 9:18 AM
To: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Cc: Ivey, Meredith <Meredith.Ivey@deo.myflorida.com>; justin.donner@deo.myflorida.com
Subject: [EXTERNAL] - RE: DEO hearings

Good day, Dr. Gueverra.

Please send your comments and feedback on the DEO hearings to Justin Donner, Director, Long Term Resiliency and Meredith Ivey, Secretary copied herein.

If you have any questions on local operations, do not hesitate to reach out to me.

V/r

Shannon Davis Weiner, FPEM
Director| Monroe County | Emergency Management
490 63rd St. Ste 150 | Marathon, FL.
Office: 305.289.602 | Cell: 305.797.1167

From: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Sent: Tuesday, June 13, 2023 5:23 PM
To: Weiner-Shannon <Weiner-Shannon@MonroeCounty-FL.Gov>
Subject: DEO hearings

...

> **CAUTION:** This email originated from outside of the County. Whether you know the sender or not, do not click links or open attachments you were not expecting.

Ms. Weiner:

Who may I send comments and suggestions to regarding the DEO hearings about evacuation plans?

jg
Jonathan Gueverra
President & CEO
305-809-3203

5901 College Road | Key West, FL 33040 | www.CFK.edu

CFK's Marine Science & Technology Division is a 2021 Center of Excellence for Domestic Maritime Workforce Training and Education (CoE) designee by the U.S. Department of Transportation, Maritime Administration.

From:	Domer, Justin
To:	Dr. Jonathan Gueverra
Cc:	Powell, Barbara; Valdez, Yazmin; Stansbury, James; FLKeysEvac; Rachel Oropeza
Subject:	RE: [EXTERNAL] - RE: DEO hearings
Date:	Wednesday, June 21, 2023 8:59:14 AM
Attachments:	image002.png image003.png image004.png image005.png image006.png image007.png

Good morning, Dr. Gueverra,

We greatly appreciate your transparent communication and offer to assist. I will make sure that the correct points of contacts here at DEO receive your emails and contact information.

Thank you!

Justin R. Domer
Director, Office of Long-Term Resiliency

Florida Department of Economic Opportunity
Office: (850) 717-8415
Cell: (850) 491-1042
www.FloridaJobs.org

From: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Sent: Tuesday, June 20, 2023 9:48 PM
To: Domer, Justin <Justin.Domer@deo.myflorida.com>; FLKeysEvac <FLKeysEvac@deo.myflorida.com>; Rachel Oropeza <rachel.oropeza@cfk.edu>
Cc: Powell, Barbara <Barbara.Powell@deo.myflorida.com>; Valdez, Yazmin <Yazmin.Valdez@deo.myflorida.com>
Subject: RE: [EXTERNAL] - RE: DEO hearings

Mr. Domer:

Thank you. I hope that some one considers this idea so that we can move us into the future for evacuation purposes. WE still think of evacuation as everyone who wants to leave getting in a car and driving out and there are better ways to do this if we give it some thought. Know that I am willing, able and ready to assist in the creation of any more efficacious plan. As home owner who lost more than 50% of out home and helped many to rebuild, I know we cannot afford the current models in use today.

Contact me any time about this and other issues,
jg

From: Domer, Justin <Justin.Domer@deo.myflorida.com>
Sent: Tuesday, June 20, 2023 1:54 PM
To: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>; FLKeysEvac <FLKeysEvac@deo.myflorida.com>
Cc: Powell, Barbara <Barbara.Powell@deo.myflorida.com>; Valdez, Yazmin <Yazmin.Valdez@deo.myflorida.com>
Subject: RE: [EXTERNAL] - RE: DEO hearings

EXTERNAL EMAIL. Think before you click.

Thank you, Dr. Gueverra. Sharing this with the evacuation team.

Justin R. Domer
Director, Office of Long-Term Resiliency

Florida Department of Economic Opportunity
Office: (850) 717-8415
Cell: (850) 491-1042
www.FloridaJobs.org

From: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Sent: Wednesday, June 14, 2023 5:17 PM
To: Domer, Justin <Justin.Domer@deo.myflorida.com>
Subject: [EXTERNAL] - RE: DEO hearings

Other Approaches to Hurricane Evacuation

The Keys and the rest of Florida is in the midst of another hurricane season. There is nothing new about this scenario. Key West Sector Coast Guard and Naval Air Station Key West are also not new to the Keys. It is time that we consider these two entities as assets and not simply as guests or tenants in the county. Both entities possess and have access to assets that could reduce the considerable time and effort it takes for the residents of the Keys, particularly those of us in the Lower Keys and Key West to be evacuated in the event of a storm. Not everyone needs or desires to drive out of the county when there is a forced evacuation. Let me elaborate.
It is time that our policy makers consider our military partners as part of the solution to some of the

local challenges. When the forecast indicates that a hurricane or tropical storm is imminent, our military partners are required to secure all of their assets including human and non-human assets. Non-essential personnel are typically evacuated and other assets are moved to alternate locations to preserve their value and integrity. This makes sense. What is incomprehensible is why our policy makers and the military are unable or unwilling to assist in the evacuation of non-military/civilians. In the aftermath of Hurricane Irma and Maria, our National Guard along with military units provided support for recovery operations. Here is a novel idea. Why don't we use these same systems to assist before the disaster strikes?

In the Key West area, could our leaders develop a "precheck" system that would allow individuals to be screened and registered for evacuation provided by military support? Prescreened residents would need to agree to meet at designated points either on a military installation or at some other location from where they will be transported to the installation for evacuation. It would be the responsibility of the evacuee to prearrange their support upon their transport out of the evacuation zone. Of course there are other details that would need to be ironed out and other challenges to overcome in order to implement such an initiative. Notwithstanding this, it changes the way we think about evacuating individuals and provides the equivalent of a mass transit approach to a problem that we have perennially seen as a private decision and personal problem.

From: Weiner-Shannon <Weiner-Shannon@MonroeCounty-FL.Gov>
Sent: Wednesday, June 14, 2023 2:50 PM
To: Justin.domer@deo.myflorida.com
Cc: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Subject: FW: DEO hearings

EXTERNAL EMAIL. Think before you click.

Hello Justin!
Please see below!

V/r

Shannon Davis Weiner, FPEM
Director| Monroe County | Emergency Management
490 63rd St. Ste 150 | Marathon, FL.
Office: 305.289.602 | Cell: 305.797.1167

From: Weiner-Shannon <Weiner-Shannon@MonroeCounty-FL.Gov>
Sent: Wednesday, June 14, 2023 9:18 AM
To: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Cc: meredith.ivey@deo.myflorida.com; justin.donner@deo.myflorida.com
Subject: RE: DEO hearings

EXTERNAL EMAIL. Think before you click.

Good day, Dr. Gueverra.

Please send your comments and feedback on the DEO hearings to Justin Donner, Director, Long Term Resiliency and Meredith Ivey, Secretary copied herein.

If you have any questions on local operations, do not hesitate to reach out to me.

V/r

Shannon Davis Weiner, FPEM
Director| Monroe County | Emergency Management
490 63rd St. Ste 150 | Marathon, FL.
Office: 305.289.602 | Cell: 305.797.1167

From: Dr. Jonathan Gueverra <jonathan.gueverra@cfk.edu>
Sent: Tuesday, June 13, 2023 5:23 PM
To: Weiner-Shannon <Weiner-Shannon@MonroeCounty-FL.Gov>
Subject: DEO hearings

...

CAUTION: This email originated from outside of the County. Whether you know the sender or not, do not click links or open attachments you were not expecting.

Ms. Weiner:

Who may I send comments and suggestions to regarding the DEO hearings about evacuation plans?

jg
Jonathan Gueverra
President & CEO
305-809-3203

THE COLLEGE OF THE FLORIDA KEYS

5901 College Road | Key West, FL 33040 | www.CFK.edu

CFK's Marine Science & Technology Division is a 2021 Center of Excellence for Domestic Maritime Workforce Training and Education (CoE) designee by the U.S. Department of Transportation, Maritime Administration.

This email communication may contain confidential information protected from disclosure by privacy laws and is intended for the use of the individual named above. If the reader of this message is not the intended recipient, this is notice to you that any dissemination, distribution or copying of this communication or any attachment to it may be a violation of federal and state privacy laws. If you have received this email in error, please notify the sender immediately by return email and delete this message. Please note that Florida has a broad public records law, and that all correspondence to me via email may be subject to disclosure. Under Florida law email addresses are public records.

South Eastern Aquatechnologies, Inc.
163 63rd Street Ocean
Marathon, FL33050

Florida Department of Economic Opportunity
Division of Community Development
Attn: BCPG
The Caldwell Building
107 East Madison Street, MSC-400
Tallahassee, FL 32399

30 June 23

To Whom It May Concern:

I am writing this letter in response to your request for public feedback regarding your agency's modeling of hurricane evacuation times in the Florida Keys and how it relates to the current resident and transient populations of the Keys.

In terms of this model, one aspect which I am sure that you are aware but was not brought up at the meeting is the increasing prevalence of electric vehicles (EVs) on the roadways. I think that this needs to be carefully considered in any evacuation model for several reasons.

First, such vehicles require much longer times to "refuel" compared to vehicles with internal combustion engines (ICE). If the time window for evacuation is only 24 hours and it may require hours to recharge an EV (depending upon the charger), this may significantly extend the required evacuation time. As I understand, Level 2 chargers typically require 8 hours to charge an EV.

Second, there is a question as to the capacity to refuel all of these vehicles in the Keys for the relatively long trip required to evacuate. That is, could all of them be charged at the same time in anticipation of a mass exodus? This relates not only to the availability of charging stations but the ability of the power grid to handle such a load.

Third, if an EV were to become disabled on the road, it may be more challenging to remove them from the roadway than that of an ICE vehicle because they are much heavier because of the battery weight. The concern with EVs catching fire when exposed to seawater should also be considered.

In summary, the increasing prevalence of EVs creates a large and in some ways incalculable variable affecting evacuation time, since it will depend highly upon the number of EVs on Keys roads in the future and the available infrastructure for their use. To me, this does not seem easy to predict with certainty, especially since EV adoption is in an upward state of flux. Thus, there is the risk of significantly underestimating its impact as your model is only updated every 10 years.

This brings up another issue of which I was unclear: Are you modeling for best case scenario only? That is, does your model anticipate vehicle breakdowns and other road hazards or all other events that may significantly impede the efficiency of evacuation?

While the focus of your inquiry was feedback on evacuation times for your model, I feel that it is important to address the highly related issue of environmental quality in the Keys. The mandate that you provided for this meeting focused on evacuation times, but as I understand it, your agency is tasked with promoting economic development in Florida. I would think that implicit in that mandate is sustainability, since without a sustainable environment, economic viability is adversely impacted. This is of especially significant concern in the Keys, where there is no question that the environment has continued to deteriorate over the decades since the Florida legislature designated the Keys as an Area of Critical State Concern. I have witnessed this firsthand since I grew up in Florida, have spent most of my life here, and first started visiting the Keys in the 1970s. It is clear that the most important factor negatively affecting the Keys environment is the significant population growth in both transient and residential populations that has occurred over that time. Thus, the DEO should not make any decisions about whether or not to allow more building in the Keys without taking this important issue into consideration. If it is considered, I do not think that one could justify allowing the issuance of any more building permits, since this threatens to negatively impact the economic sustainability of the Keys.

I urge you to please carefully consider the long-term ramifications of your deliberations on this matter. You as a group and individually have an opportunity to have a major positive impact on preventing further degradation of the Keys and hopefully allowing the reversal of much of the damage that has occurred due to overdevelopment. I sincerely hope that you make it your legacy for future generations.

Sincerely,

Edward J. Noga M.S., D.V.M
President

Valdez, Yazmin

From: John Hammerstrom <johnhammerstrom@mac.com>
Sent: Tuesday, November 21, 2023 5:09 PM
To: FLKeysEvac
Subject: [EXTERNAL] - Florida Keys Hurricane Evacuation & Development
Attachments: Hurricane Evacuation letter 2023.pdf

James D. Stansbury, Chief
Florida Bureau of Community Planning and Growth
November 21, 2023

It would be starkly irresponsible for state and county officials to further relax hurricane-evacuation standards to facilitate more development in the Florida Keys.

I have studied Monroe County's hurricane evacuation policy for thirty years and was a member of the Monroe County 2012 Clearance Time Working Group that established the current evacuation and development limits. During those three decades, the public-safety protections intended for "Hurricane Evacuation Clearance Time", or the time it takes to evacuate the Keys in the face of a major hurricane, have been progressively eroded.

Originally, all Keys inhabitants were included in the statutory 24-hour clearance-time limit. In 2001, the Director of Emergency Management, Billy Wagner stated, *"…traffic generated by hotels and other tourist units were included in determining clearance times, rather than discounted because they will be required to evacuate early… not all hurricanes approaching the Keys will be 'considerate' enough to provide ample warning for advanced tourist evacuation."*

Nevertheless, in 2004, over objections from the public, significantly greater development was facilitated by removing all tourists and a significant portion of the residents from the clearance-time calculation based on the false assumption that 48 hours advance warning of hurricane landfall would always be available. It was dangerous then and is increasingly so.

The Royal Meteorological Society published the following recently. *"Hurricane Otis struck very near Acapulco, Mexico, late at night on 24 October 2023 as a monster 165 mile-per-hour category 5 cyclone. The previous night, about 24 hours before landfall, the National Hurricane Center was predicting it would do so as 70 mile-per-hour tropical storm. With the energy content (and destructive potential) of the wind increasing with the cube of the windspeed, that means that Otis reached Mexico with 13 times more destructive potential than what had been expected!…Otis grew from a tropical storm into a category 3 hurricane in the span of 6 hours!…A whopping 80 percent of this year's storms have undergone rapid intensification."*

Greater density, dismal traffic flows, warming oceans, rising sea level, rapid hurricane intensification and higher insurance premiums describe objectively greater risk. Monroe County and the state are weighing further reduction of the already diminished evacuation-safety margin in order to facilitate yet more development beyond the limits agreed to by the state, county and municipalities in 2012. Do not increase the probability of an evacuation disaster.

John Hammerstrom
Papaaloa, Hawaii

Valdez, Yazmin

From: HOA President <hphoapresident93@gmail.com>
Sent: Monday, December 4, 2023 11:53 AM
To: FLKeysEvac
Cc: Jim.mooney@myfloridahouse.gov; rodriguez.anamaria.web@flsenate.gov; Holly Raschein; BOCCDIS3; boccdis4@monroecounty-fl.gov; boccdis2@monroecounty-fl.gov; Craig Cates
Subject: [EXTERNAL] - Hurricane Evacuation Modeling
Attachments: 2023 HPHOA response to Dept Commerce Hurricane Evacuation Model.pdf

Attached please find our response and comments regarding the Hurricane Evacuation Modeling.
Thank you for allowing us to participate in this process.
Helen Shinners, President
Hammer Point Owners Association
PO BOx 90
Tavernier, Fl 33070

Hammer Point Owners Association
PO BOX 90
Tavernier, FL 33070

November 17, 2023

To: Florida Commerce Division of Community Development
Caldwell Building107 East Madison Street, MSC-400
Tallahassee, FL 32399

Via: FlkeysEvac@DEO.MyFlorida.com

RE: Florida Keys Evacuation Modeling/Development

Dear Department of Commerce,

Thank you for your presentation on Tuesday Nov 14, 2023. I attended the workshop, and also reviewed the video presentation and slide presentation subsequent to that.

I am submitting comments and concerns on behalf of the residents of Hammer Point Park, Hammer Point Owners Association.

The existing conditions that the FL Keys are currently experiencing make these issues of outmost importance to our communities. We are at a pivotal moment for the Florida Keys.

The mere thought that almost 8,000 building allocations (ROGOS and BPAS) could be allocated in the next 10 years, is alarming and realistically unsustainable.

According to your modeling, the State mandated timeline for Keys evacuation is currently 24 hours for residents and 48 hours for tourists. The current conditions, without future development, indicate that the evacuation clearance time for residents is at about 26 hours. If the State were to allow these roughly 7,954 ROGO and BPAS units, the evacuation time is pushed to about 31 hours. If only one half of these units were allocated, the time would be about 27.5 hours. These times seem realistically low.

Not including Key West in some of your clearance models is also unrealistic. We can think of no scenario where Key West would not evacuate, given an order to evacuate the rest of the Keys.,

How would our current failing infrastructure issues including water and electric utilities, roads and bridges, factor into the state allocating more of these units to the Keys? And how is Department of Commerce factoring these issues in the recommendations or information submitted to the State Administration Commission?

Can you please summarize how your departments goals of, public safety, quality of life and environmental protection, factor in to your modeling? We did not see these issues addressed or presented in the workshops.

The 2023 US 1 Arterial Travel Time and Delay Study, congestion on US1 is real and chronic. The Level of Service on US 1 has deteriorated, as the study revealed, and those of us who live here experience this on a daily basis.

How does the failed Keys Carrying Capacity Study, factor into the Department of Commerce recommendations or submittal of information to the State Administration Commission?

We agree with other environmental groups and community organizations, , that the decisions the Florida Governor and Cabinet will make without being well informed on the issues of concerns to the Keys residents, will instead mislead them to favor the interests of developers.

If the State of Florida cares about the Florida Keys as an Area of Critical Concern then, allocating these units without consideration of the environmental and economic impacts that will result when the quality of life and infrastructure decline, in favor of more unsustainable development, would be devastating.

We hope that more community and residents input regarding these critical issues can be incorporated into your modeling, when recommendations or information are submitted to the State Administration Commission

Thank you for allowing us to participate in this process.

Respectfully submitted

Helen Shinners, President
Hammer Point Owners Association
PO BOX 90, Tavernier FL 33070

Appendix E

Select Year: 2023 Go

The 2023 Florida Statutes

Title XXVIII	Chapter 380	View Entire Chapter
NATURAL RESOURCES; CONSERVATION, RECLAMATION, AND USE	LAND AND WATER MANAGEMENT	

1380.0552 Florida Keys Area; protection and designation as area of critical state concern.—

(1) SHORT TITLE.—This section may be cited as the "Florida Keys Area Protection Act."

(2) LEGISLATIVE INTENT.—It is the intent of the Legislature to:

(a) Establish a land use management system that protects the natural environment of the Florida Keys.

(b) Establish a land use management system that conserves and promotes the community character of the Florida Keys.

(c) Establish a land use management system that promotes orderly and balanced growth in accordance with the capacity of available and planned public facilities and services.

(d) Provide affordable housing in close proximity to places of employment in the Florida Keys.

(e) Establish a land use management system that promotes and supports a diverse and sound economic base.

(f) Protect the constitutional rights of property owners to own, use, and dispose of their real property.

(g) Promote coordination and efficiency among governmental agencies that have permitting jurisdiction over land use activities in the Florida Keys.

(h) Promote an appropriate land acquisition and protection strategy for environmentally sensitive lands within the Florida Keys.

(i) Protect and improve the nearshore water quality of the Florida Keys through federal, state, and local funding of water quality improvement projects, including the construction and operation of wastewater management facilities that meet the requirements of ss. 381.0065(4)(l) and 403.086(11), as applicable.

(j) Ensure that the population of the Florida Keys can be safely evacuated.

(3) RATIFICATION OF DESIGNATION.—The designation of the Florida Keys Area as an area of critical state concern, the boundaries of which are described in chapter 27F-8, Florida Administrative Code, as amended effective August 23, 1984, is hereby ratified.

(4) REMOVAL OF DESIGNATION.—

(a) The designation of the Florida Keys Area as an area of critical state concern under this section may be recommended for removal upon fulfilling the legislative intent under subsection (2) and completion of all the work program tasks specified in rules of the Administration Commission.

(b) Beginning November 30, 2010, the state land planning agency shall annually submit a written report to the Administration Commission describing the progress of the Florida Keys Area toward completing the work program tasks specified in commission rules. The land planning agency shall recommend removing the Florida Keys Area from being designated as an area of critical state concern to the commission if it determines that:

1. All of the work program tasks have been completed, including construction of, operation of, and connection to central wastewater management facilities pursuant to s. 403.086(11) and upgrade of onsite sewage treatment and disposal systems pursuant to s. 381.0065(4)(l);

2. All local comprehensive plans and land development regulations and the administration of such plans and regulations are adequate to protect the Florida Keys Area, fulfill the legislative intent specified in subsection (2), and are consistent with and further the principles guiding development; and

3. A local government has adopted a resolution at a public hearing recommending the removal of the designation.

(c) After receipt of the state land planning agency report and recommendation, the Administration Commission shall determine whether the requirements have been fulfilled and may remove the designation of the Florida Keys as an area of critical state concern. If the commission removes the designation, it shall initiate rulemaking to repeal any rules relating to such designation within 60 days. If, after receipt of the state land planning agency's report and recommendation, the commission finds that the requirements for recommending removal of designation have not been met, the commission shall provide a written report to the local governments within 30 days after making such a finding detailing the tasks that must be completed by the local government.

(d) The Administration Commission's determination concerning the removal of the designation of the Florida Keys as an area of critical state concern may be reviewed pursuant to chapter 120. All proceedings shall be conducted by the Division of Administrative Hearings and must be initiated within 30 days after the commission issues its determination.

(e) After removal of the designation of the Florida Keys as an area of critical state concern, the state land planning agency shall review proposed local comprehensive plans, and any amendments to existing comprehensive plans, which are applicable to the Florida Keys Area, the boundaries of which were described in chapter 28-29, Florida Administrative Code, as of January 1, 2006, for compliance as defined in s. 163.3184. All procedures and penalties described in s. 163.3184 apply to the review conducted pursuant to this paragraph.

(f) The Administration Commission may adopt rules or revise existing rules as necessary to administer this subsection.

(5) APPLICATION OF THIS CHAPTER.—Section 380.05(1)-(5), (9)-(11), (15), (17), and (21) shall not apply to the area designated by this section for so long as the designation remains in effect. Except as otherwise provided in this section, s. 380.045 shall not apply to the area designated by this section. All other provisions of this chapter shall apply, including s. 380.07.

(6) RESOURCE PLANNING AND MANAGEMENT COMMITTEE.—The Governor, acting as the chief planning officer of the state, shall appoint a resource planning and management committee for the Florida Keys Area with the membership as specified in s. 380.045(2). Meetings shall be called as needed by the chair or on the demand of three or more members of the committee. The committee shall:

(a) Serve as a liaison between the state and local governments within Monroe County.

(b) Develop, with local government officials in the Florida Keys Area, recommendations to the state land planning agency as to the sufficiency of the Florida Keys Area's comprehensive plan and land development regulations.

(c) Recommend to the state land planning agency changes to state and regional plans and regulatory programs affecting the Florida Keys Area.

(d) Assist units of local government within the Florida Keys Area in carrying out the planning functions and other responsibilities required by this section.

(e) Review, at a minimum, all reports and other materials provided to it by the state land planning agency or other governmental agencies.

(7) PRINCIPLES FOR GUIDING DEVELOPMENT.—State, regional, and local agencies and units of government in the Florida Keys Area shall coordinate their plans and conduct their programs and regulatory activities consistent with the principles for guiding development as specified in chapter 27F-8, Florida Administrative Code, as amended effective August 23, 1984, which is adopted and incorporated herein by reference. For the purposes of reviewing the consistency of the adopted plan, or any amendments to that plan, with the principles for guiding development, and any amendments to the principles, the principles shall be construed as a whole and specific provisions may not be construed or applied in isolation from the other provisions. However, the principles for guiding development are repealed 18 months from July 1, 1986. After repeal, any plan amendments must be consistent with the following principles:

(a) Strengthening local government capabilities for managing land use and development so that local government is able to achieve these objectives without continuing the area of critical state concern designation.

(b) Protecting shoreline and marine resources, including mangroves, coral reef formations, seagrass beds, wetlands, fish and wildlife, and their habitat.

(c) Protecting upland resources, tropical biological communities, freshwater wetlands, native tropical vegetation (for example, hardwood hammocks and pinelands), dune ridges and beaches, wildlife, and their habitat.

(d) Ensuring the maximum well-being of the Florida Keys and its citizens through sound economic development.

(e) Limiting the adverse impacts of development on the quality of water throughout the Florida Keys.

(f) Enhancing natural scenic resources, promoting the aesthetic benefits of the natural environment, and ensuring that development is compatible with the unique historic character of the Florida Keys.

(g) Protecting the historical heritage of the Florida Keys.

(h) Protecting the value, efficiency, cost-effectiveness, and amortized life of existing and proposed major public investments, including:

1. The Florida Keys Aqueduct and water supply facilities;
2. Sewage collection, treatment, and disposal facilities;
3. Solid waste treatment, collection, and disposal facilities;
4. Key West Naval Air Station and other military facilities;
5. Transportation facilities;
6. Federal parks, wildlife refuges, and marine sanctuaries;
7. State parks, recreation facilities, aquatic preserves, and other publicly owned properties;
8. City electric service and the Florida Keys Electric Co-op; and
9. Other utilities, as appropriate.

(i) Protecting and improving water quality by providing for the construction, operation, maintenance, and replacement of stormwater management facilities; central sewage collection; treatment and disposal facilities; the installation and proper operation and maintenance of onsite sewage treatment and disposal systems; and other water quality and water supply projects, including direct and indirect potable reuse.

(j) Ensuring the improvement of nearshore water quality by requiring the construction and operation of wastewater management facilities that meet the requirements of ss. 381.0065(4)(l) and 403.086(11), as applicable, and by directing growth to areas served by central wastewater treatment facilities through permit allocation systems.

(k) Limiting the adverse impacts of public investments on the environmental resources of the Florida Keys.

(l) Making available adequate affordable housing for all sectors of the population of the Florida Keys.

(m) Providing adequate alternatives for the protection of public safety and welfare in the event of a natural or manmade disaster and for a postdisaster reconstruction plan.

(n) Protecting the public health, safety, and welfare of the citizens of the Florida Keys and maintaining the Florida Keys as a unique Florida resource.

(8) COMPREHENSIVE PLAN ELEMENTS AND LAND DEVELOPMENT REGULATIONS.—The comprehensive plan elements and land development regulations approved pursuant to s. 380.05(6), (8), and (14) shall be the comprehensive plan elements and land development regulations for the Florida Keys Area.

(9) MODIFICATION TO PLANS AND REGULATIONS.—

(a) Any land development regulation or element of a local comprehensive plan in the Florida Keys Area may be enacted, amended, or rescinded by a local government, but the enactment, amendment, or rescission becomes effective only upon approval by the state land planning agency. The state land planning agency shall review the proposed change to determine if it is in compliance with the principles for guiding development specified in chapter 27F-8, Florida Administrative Code, as amended effective August 23, 1984, and must approve or reject the requested changes within 60 days after receipt. Amendments to local comprehensive plans in the Florida Keys Area must also be reviewed for compliance with the following:

1. Construction schedules and detailed capital financing plans for wastewater management improvements in the annually adopted capital improvements element, and standards for the construction of wastewater treatment and disposal facilities or collection systems that meet or exceed the criteria in s. 403.086(11) for wastewater treatment and disposal facilities or s. 381.0065(4)(l) for onsite sewage treatment and disposal systems.

2. Goals, objectives, and policies to protect public safety and welfare in the event of a natural disaster by maintaining a hurricane evacuation clearance time for permanent residents of no more than 24 hours. The hurricane evacuation clearance time shall be determined by a hurricane evacuation study conducted in accordance with a professionally accepted methodology and approved by the state land planning agency.

(b) The state land planning agency, after consulting with the appropriate local government, may, no more than once per year, recommend to the Administration Commission the enactment, amendment, or rescission of a land development regulation or element of a local comprehensive plan. Within 45 days following the receipt of such recommendation, the commission shall reject the recommendation, or accept it with or without modification and adopt it by rule, including any changes. Such local development regulation or plan must be in compliance with the principles for guiding development.

History.—s. 6, ch. 79-73; s. 4, ch. 86-170; s. 1, ch. 89-342; s. 641, ch. 95-148; s. 3, ch. 2006-223; s. 34, ch. 2010-205; s. 26, ch. 2011-4; s. 7, ch. 2016-225; s. 39, ch. 2020-150.

[1]**Note.**—Section 7, ch. 2006-223, provides that "[i]f the designation of the Florida Keys Area as an area of critical state concern is removed, the state shall be liable in any inverse condemnation action initiated as a result of Monroe County land use regulations applicable to the Florida Keys Area as described in chapter 28-29, Florida Administrative Code, and adopted pursuant to instructions from the Administration Commission or pursuant to administrative rule of the Administration Commission, to the same extent that the state was liable on the date the Administration Commission determined that substantial progress had been made toward accomplishing the tasks of the work program as defined in s. 380.0552(4)(c), Florida Statutes. If, after the designation of the Florida Keys Area as an area of critical state concern is removed, an inverse condemnation action is initiated based upon land use regulations that were not adopted pursuant to instructions from the Administration Commission or pursuant to administrative rule of the Administration Commission and in effect on the date of the designation's removal, the state's liability in the inverse condemnation action shall be determined by the courts in the manner in which the state's liability is determined in areas that are not areas of critical state concern. The state shall have standing to appear in any inverse condemnation action."

Copyright © 1995-2023 The Florida Legislature • Privacy Statement • Contact Us

Appendix F

08-02-12

HURRICANE EVACUATION CLEARANCE TIME MEMORANDUM OF UNDERSTANDING

BY AND BETWEEN

THE FLORIDA DEPARTMENT OF ECONOMIC OPPORTUNITY AND THE COUNTY OF MONROE, CITY OF KEY WEST, ISLAMORADA, VILLAGE OF ISLANDS, CITY OF LAYTON, CITY OF KEY COLONY BEACH, CITY OF MARATHON, AND FLORIDA DIVISION OF EMERGENCY MANAGEMENT

This Memorandum of Understanding ("MOU") is entered into by and between the State of Florida's Department of Economic Opportunity (the "DEO"), the Florida Division of Emergency Management (the "Division"), and Monroe County, the City of Key West, Islamorada, Village of Islands, the City of Layton, the City of Key Colony Beach, and the City of Marathon (the "Local Governments") (all collectively known as the "Parties") for the purpose of complying with Rules 28-18, 28-19, and 28-20, Florida Administrative Code.

RECITALS:

WHEREAS, the Local Governments of the Florida Keys are within two areas that the Florida Legislature and the Administration Commission have designated as Areas of Critical State Concern (the Florida Keys ACSC and the City of Key West ACSC), pursuant to Sections 380.05 and 380.0552, Florida Statutes, and Florida Administrative Code Chapter 28-36, hereinafter referred to as the "Keys ACSCs"; and

WHEREAS, the Local Governments have adopted state-mandated Comprehensive Plans and Land Development Regulations, which have been approved by the State, as required by law; and

WHEREAS, the State's Legislative Intent in designating the Local Governments as Areas of Critical State Concern includes:

(a) Establish a land use management system that protects the natural environment of the Florida Keys;

(b) Establish a land use management system that conserves and promotes the community character of the Florida Keys;

(c) Establish a land use management system that promotes orderly and balanced growth in accordance with the capacity of available and planned public facilities and services;

(d) Provide affordable housing in close proximity to places of employment in the Florida Keys;

(e) Establish a land use management system that promotes and supports a diverse and sound economic base;

(f) Protect the constitutional rights of property owners to own, use, and dispose of their real property;

(g) Promote coordination and efficiency among governmental agencies that have permitting jurisdiction over land use activities in the Florida Keys;

(h) Promote an appropriate land acquisition and protection strategy for environmentally sensitive lands within the Florida Keys;

(i) Protect and improve the nearshore water quality of the Florida Keys through the construction and operation of wastewater management facilities that meet the requirements of Sections 381.0065(4)(l) and 403.086(10), Florida Statutes, as applicable; and

(j) Ensure that the population of the Florida Keys can be safely evacuated (Section 380.0552(2) Florida Statutes); and

WHEREAS, the Florida Keys remain one of the most vulnerable areas in the United States to hurricanes; and

WHEREAS, the Florida Legislature and the Administration Commission have mandated that the Local Governments (except the City of Key West) include within the goals, objectives, and policies of their respective Comprehensive Plans measures to protect public safety and welfare in the event of a hurricane by maintaining an evacuation clearance time for permanent residents of no more than 24 hours (Section 380.0552(9)(a)2. Florida Statutes, Rule 28-18.400(5)(a)10., F.A.C., Rule 28-19.310(5)(a)5., F.A.C., and Rule 28-20.140(5)(a)14., F.A.C.); and

WHEREAS, Florida Administrative Code Rule 28-36.003(2)(a)7. requires that the City of Key West prepare and adopt an evacuation plan which is consistent with the regional and County plans; and

WHEREAS, the Florida Legislature further mandated that the hurricane evacuation clearance time for the Florida Keys ACSC shall be determined by a state-approved hurricane evacuation study, conducted in accordance with a professionally accepted methodology; and

WHEREAS, the Division of Emergency Management evacuation study, titled "Statewide Regional Evacuation Studies Program" dated November 2010, which includes Regional Behavioral Surveys Volumes 2-11, and was funded by the state Legislature and the Federal Emergency Management Agency ("FEMA"), provided the State's principal source of professionally acceptable data and analysis, augmented by other sources of data and analysis as referenced herein, for determining input variables and assumptions depicting evacuation clearance times for the population of the Florida Keys; and

WHEREAS, the Administration Commission has directed DEO, by July 1, 2012, to apply the derived clearance time to assess and determine the remaining allocations for the Florida Keys ACSC or identify alternative evacuation strategies that support the 24 hour evacuation clearance time; and

WHEREAS, the Administration Commission has directed DEO, the Division, and the Local Governments to enter into this MOU to stipulate to the input variables and assumptions, including regional considerations, for utilizing the Florida Keys Hurricane Evacuation Model or other models

acceptable to DEO in order to accurately depict evacuation clearance times for the population of the Florida Keys ACSC; and

WHEREAS, DEO has determined that the Florida Division of Emergency Management's Transportation Interface for Modeling Evacuations ("TIME") Model is the model acceptable to DEO to accurately depict evacuation clearance times for the population of the Keys ACSCs; and

WHEREAS, the Local Governments of the Florida Keys, except the City of Key Colony Beach, have regulated the rate and distribution of growth by implementing permit allocation systems to address hurricane evacuation clearance times; and

WHEREAS, DEO and the Local Governments recognize that significant vacant lands remain in the Florida Keys: Monroe County with 8,758 vacant parcels (77% of total vacant lands), Marathon with 1,281 vacant parcels (11%), Islamorada with 1,109 vacant parcels (10%), Key Colony Beach with 92 vacant parcels (0.81%), Key West with 84 vacant parcels (0.74%), and Layton with 13 vacant parcels (0.11%); and

WHEREAS , DEO and the Local Governments recognize the need to balance limiting the maximum number of building permits for new construction of residential units to be issued annually in the Florida Keys with fairness and consideration of private property rights; and

WHEREAS, to address hurricane evacuation modeling for the Florida Keys ACSCs, DEO established a Hurricane Evacuation Clearance Time Work Group ("Work Group") consisting of elected officials from each Local Government and representatives from DEO and DEM; in addition DEO invited representatives of special interests in the Florida Keys to participate, including the Florida Keys Federation of Chambers of Commerce, the Florida Restaurant and Lodging Association, the Lodging Association of the Florida Keys and Key West, the Monroe County Sheriff's Office, Naval Air Station-Key West, the environmental community, and a citizen's advocacy group; and further DEO requested technical advisors from DEO, the Division, and the Local Governments as well as the Northeast Florida Regional Planning Council, the South Florida Regional Planning Council, Monroe County Emergency Management, the National Weather Service, the National Hurricane Center, and the Florida Department of Transportation to participate in meeting discussion; and

WHEREAS, four advertised public workshops were conducted in the Florida Keys where the Work Group reviewed studies and data from DEO and other agencies related to the occupancy, participation, human behavior, response curves, capacity of the evacuation route, and the number of automobiles that will likely be evacuated, and other factors; and

WHEREAS, the Work Group evaluated information, provided input, and ultimately recommended Scenario M5; and

WHEREAS, from among the scenarios provided by DEO at the June 8, 2012, Work Group meeting, Scenario M5 included the 2010 Census site-built units (43,760 units); the maximum number of residential building permits for new construction for all Local Governments per year for 10 years (annually, County 197, Marathon 30, Islamorada 28, Key West 90, Key Colony Beach 6 and Layton 3); 1,248 mobile home units projected to convert to site-built units; the exclusion of 870 dwelling units on

the Naval Air Station; as well as two (2) functional evacuation lanes from MM 108-126. Further, the Work Group recommended Scenario M5 with the provision that the City of Key West would transfer annually (by July 13th) any remaining or unused (90 allocations) allocations to the other Local Governments based upon the Local Governments' ratio of vacant land; and

WHEREAS, following the June 8, 2012, Work Group meeting, technical corrections were made to the Census site built units revising that number to 43,718 and revising the Key West building permit allocation to 91, which corrections do not affect the hurricane evacuation clearance time for the population of the Florida Keys; and

WHEREAS, the Local Governments acknowledge that the safe and timely evacuation of the population of the Florida Keys in the event of a hurricane requires a consistent and cooperative approach and to that end, having participated as members of the Work Group, acknowledge that the input variables and assumptions identified in this MOU are those which DEO finds accurately depict evacuation clearance times for the population of the Florida Keys for a Category 3-5 hurricane event, as required by Administrative Rule; and

WHEREAS, Marathon, Key West, Layton, Monroe County, and Islamorada requested new participation rate studies be conducted, due principally to the low sample rates primarily for mobile homes relied upon by DEO; and,

WHEREAS, the Work Group accepted the participation rates recommended by DEO, including those for mobile homes, and DEO agreed to seek funding to provide education to mobile home occupants regarding the need to evacuate during Phase I due to the vulnerability of mobile homes; and

WHEREAS, the Local Governments recognize that the data, input variables, and assumptions DEO has incorporated into its hurricane evacuation model and this MOU are subject to change when the 2020 Census data becomes available.

NOW THEREFORE, the parties set forth the following understandings:

PART ONE: RECITALS

The above recitals are incorporated into this MOU and made a part hereof.

PART TWO: DATA, INPUT VARIABLES AND ASSUMPTIONS

The Human Behavioral Studies from the 2010 Statewide Regional Evacuation Study, the 2010 Census as supplemented by the 2006-2010 American Community Survey, Smith Travel Research, and data from the Department of Business and Professional Regulation, Division of Hotels and Restaurants, and Statewide Regional Evacuation Study Program for the South Florida Region are the best available and most relevant data and analysis. The following input variables and assumptions provide the basis, when used in the TIME model, to accurately calculate evacuation clearance times for the population of the Florida Keys, and DEO will recommend same to the Administration Commission to determine the remaining development allocations for the Florida Keys:

08-02-12

A. Number and Occupancy of Units by type of Unit:

1. **Tourist Units**: 13,665 tourist units with 11,287 occupied units for the month of July (the month with highest average number of permanent and seasonal residents and tourists). The data source for the number and type of units and vehicular use is the Statewide Regional Evacuation Study Program for the South Florida Region and the Department of Business and Professional Regulation, Division of Hotels and Restaurants, Licensee File Database, District 1 (March 29, 2010). The data source for occupancy of tourist units is the Smith Travel Research 2012: Historic Trend Report for 2011 for the month of July. A listing of the units is within the Statewide Regional Evacuation Study Table of Traffic Evacuation Zone Occupancy Data: Hotel, Motel and other Vacation Rental Units is attached and incorporated herein as **Exhibit 1**.

2. **Mobile Home Units**: 8,134 Mobile Home units with 4,576 occupied units. The data source for the number and type of units, the vehicular use and occupancy of the units is the 2010 Census supplemented by the 2006-2010 American Community Survey for Monroe County and the Statewide Regional Evacuation Study Program for the South Florida Region. A listing of the units is within the Statewide Regional Evacuation Study Table of Traffic Evacuation Zone Occupancy Data for Site-Built and Mobile Homes, is attached and incorporated herein as **Exhibit 2**.

3. **Site-Built Units:** 43,718 Site-built units with 27,320 occupied units. The data source for the number, type, occupancy, and vehicular use is the 2010 Census supplemented by the 2006-2010 American Community Survey and the Statewide Regional Evacuation Study Program for the South Florida Region. See **Exhibit 2**.

B. Response Curve: The assumed Response Curve for model runs is 12 hours for all unit types as utilized in the 2010 Statewide Regional Evacuation Study Program for the South Florida Region.

C. Participation Rates: The assumed Participation Rates are:

1. Tourist units:	100%
2. Mobile home units:	100%
3. Site-built units:	90% for a Category 5 event

The participation rates are based upon the 2010 Statewide Regional Evacuation Study, Regional Behavioral Analysis Volumes 2-11, prepared for the South Florida Region, which DEO has determined reflect the best available data at this time.

D. Vehicle Usage by Units by type of Unit: A listing of the vehicle count and usage by Traffic Evacuation Zone quantifies the number of vehicles owned (**Exhibit 3**) and the percent of vehicles owned that will be evacuated (**Exhibit 4**). Exhibits 3 and 4 are based upon the 2010 Statewide Regional Evacuation Study and are attached and incorporated herein.

E. Vehicle Usage by the Special Population: Exhibit 5 represents the number of vehicles that will be contributed by Naval Air Station – Key West and the Florida Keys Community College and is

based upon correspondence from Naval Air Station – Key West and the assumption that each of the 100 dorm beds from the Florida Keys Community College will contribute one evacuating vehicle per bed.

F. Evacuation Stream. The evacuation stream from Monroe County is the only assumed traffic demand considered.

G. Roadway Capacity. The Roadway Capacity, dated July 18, 2010, established by the Florida Department of Transportation is attached and incorporated herein as **Exhibit 6**.

H. Evacuation Procedures. The following evacuation procedures have been adopted or substantially adopted by the Local Governments (except the City of Key West) into their comprehensive plans, and by the City of Key West in Resolution No. 06-244:

1. Approximately 48 hours in advance of tropical storm winds, a mandatory evacuation of non-residents, visitors, recreational vehicles (RV's), travel trailers, live-aboards (transient and non-transient), and military personnel from the Keys shall be initiated. State parks and campgrounds should be closed at this time or sooner and entry into the Florida Keys by non-residents should be strictly limited.

2. Approximately 36 hours in advance of tropical storm winds, a mandatory evacuation of mobile home residents, special needs residents, and hospital and nursing home patients from the Keys shall be initiated.

3. Approximately 30 hours in advance of tropical storm winds, a mandatory phased evacuation of permanent residents by evacuation zone (described below) shall be initiated. Existing evacuation zones are as follows:

    a) Zone 1 –Key West, Stock Island and Key Haven to Boca Chica Bridge (MM 1-6)
    b) Zone 2 –Boca Chica Bridge to West end of 7-mile Bridge (MM 6-40)
    c) Zone 3 –West end of 7-Mile Bridge to West end of Long Key Bridge (MM 40-63)
    d) Zone 4 –West end of Long Boat Key Bridge to CR 905 and CR 905A intersection (MM 63-106.5)
    e) Zone 5 –905A to, and including Ocean Reef (MM 106.5–126.5)

The actual sequence of the evacuation by zones will vary depending on the individual storm. The concepts embodied in this staged evacuation procedures should be embodied in the appropriate operational Emergency Management Plans. The evacuation plan shall be monitored and updated on an annual basis to reflect increases, decreases and or shifts in population; particularly the resident and non-resident populations.

PART THREE: MISCELLANEOUS

A. **Liability**. As this MOU represents only the Parties' acknowledgement of the data, input variables, and assumptions DEO has utilized in its hurricane evacuation model, nothing in this MOU shall be construed to impose any liability on the State of Florida, DEO, the Division, or the Local Governments. Nothing in this MOU may be interpreted as a waiver of sovereign immunity by any

Party. Any provision of this MOU that is inconsistent with the State's sovereign immunity statute shall be considered null and void.

B. **Modification**. Modifications to the Memorandum of Understanding shall be valid only when reduced to writing and duly signed by all parties.

C. **Severability**. If any term or provision of this Memorandum of Understanding shall be invalid or unenforceable to any extent, the Parties agree to comply with remaining terms and provisions, unless compliance with the remaining terms and provisions would prevent the accomplishment of the original intent of the agreement between the Parties.

D. **Termination**. Any Party may terminate this Memorandum of Understanding at any time, with or without cause. Termination shall take effect upon receipt of written notification by a Party to all other Parties.

E. **Notification**. Notifications under this MOU shall be made by hand delivery, U. S. certified mail, return receipt requested, or an express mail service that provides proof of delivery. Notification by a Party to the DEO shall be directed to the Areas of Critical State Concern Administrator, Department of Economic Opportunity, 107 East Madison Street, Tallahassee, FL 32399-4128. Notification to the other parties to this Memorandum of Understanding shall be directed as follows:

1. **Monroe County.** Mayor, Monroe County, 2798 Overseas Hwy. Marathon, FL 33050 with a copy to the Growth Management Division Director, 2798 Overseas Hwy. Marathon, FL 33050.

2. **City of Key West.** Mayor, City of Key West, 3126 Flagler Avenue Key West, FL 33040, with a copy to the Planning Director, 3126 Flagler Avenue Key West, FL 33040.

3. **City of Marathon.** Mayor, City of Marathon, 9805 Overseas Highway Marathon, FL 33050, with a copy to the Planning Director, 9805 Overseas Highway Marathon, FL 33050.

4. **City of Layton.** Mayor, City of Layton, 68260 Overseas Highway, P.O. Box 778 Long Key, FL 33001.

5. **City of Key Colony Beach.** Mayor, City of Key Colony Beach, P.O. Box 510141, Key Colony Beach, FL 33051-0141 with a copy to the City Clerk at P.O. Box 510141, Key Colony Beach, FL 33051-0141.

6. **Islamorada, Village of Islands.** Mayor, Islamorada, Village of Islands, 86800 Overseas Highway Islamorada, FL 33036, with a copy to the Director of Planning and Development Services, 86800 Overseas Highway Islamorada, FL 33036.

7. **Division of Emergency Management.** Director, Florida Division of Emergency Management, 2555 Shumard Oaks Boulevard, Tallahassee, FL 32399-2100, with a copy to the Division's Hurricane Program Manager at the same address.

F. **Effective Date**. This Memorandum of Understanding is effective upon execution by all parties and approval by the Florida Administration Commission and ends upon the termination of the Florida

08-02-12

Keys Area of Critical State Concern designations, unless terminated earlier according to Part 4(D) above.

IN WITNESS WHEREOF, the parties have executed this Memorandum of Understanding on the dates below written.

CITY OF KEY WEST, FLORIDA

August 24, 2012
Date

Craig Cates, Mayor

ATTEST: Cheryl Smith
Cheryl Smith, City Clerk

Approved as to form and legal sufficiency:

Shawn Smith, City Attorney

08-02-12

BOARD OF COUNTY COMMISSIONERS
OF MONROE COUNTY, FLORIDA

September 21, 2012
Date

David Rice, Mayor

ATTEST: DANNY L. KOLHAGE, Clerk

Clerk

Approved as to form and legal sufficiency:

Steven T. Williams, County Attorney

08-02-12

CITY OF MARATHON, FLORIDA

10/4/2012, 2012
Date

Peter Worthington, Mayor

ATTEST:

Diane Clavier
_____, City Clerk

Approved as to form and legal sufficiency:

_____
John R. Herin, City Attorney

08-02-12

CITY OF LAYTON, FLORIDA

Sept. 18, 2012
Date

Norman S. Anderson, Mayor

ATTEST:

Mimi Young, City Clerk

Approved as to form and legal sufficiency:

, City Attorney

08-02-12

CITY OF KEY COLONY BEACH, FLORIDA

8/27, 2012
Date

Ron Sutton, Mayor

ATTEST:

~~Vickie L. Bollinger~~, City Clerk
Cathy Henninger

Approved as to form and legal sufficiency:

Thomas D. Wright, City Attorney

08-02-12

ISLAMORADA, VILLAGE OF ISLANDS, FLORIDA

September 27th, 2012
Date

Michael Reckwerdt, Mayor

ATTEST:

Deputy Village Clerk

Approved as to form and legal sufficiency:

Nina Boniske, Village Attorney

08-02-12

STATE OF FLORIDA
DIVISION OF EMERGENCY MANAGEMENT

September 27, 2012
Date

Bryan W. Koon, Director

Approved as to form and legal sufficiency:

Assistant General Counsel

08-02-12

STATE OF FLORIDA DEPARTMENT
OF ECONOMIC OPPORTUNITY

November 5, 2012

J. Thomas Beck, AICP
Director, Division of Community
Development

Approved as to form and legal
sufficiency, subject only to full and
proper execution by the parties

Office of the General Counsel
Department of Economic Opportunity

By: _____
Assistant General Counsel
Approved Date: 11-5-12

08-02-12

Exhibits to
Hurricane Evacuation Clearance Time Memorandum of Understanding

Exhibit 1	Statewide Regional Evacuation Study Table of Traffic Evacuation Zone Occupancy Data: Hotel, Motel and other Vacation Rental Units
Exhibit 2	Statewide Regional Evacuation Study Table of Traffic Evacuation Zone Occupancy Data for Site-Built and Mobile Homes
Exhibit 3	Listing of the vehicle count and usage by Traffic Evacuation Zone (based on the 2010 Statewide Regional Evacuation Study)
Exhibit 4	Percent of vehicles owned that will be evacuated (based on the 2010 Statewide Regional Evacuation Study)
Exhibit 5	Identification of contributing vehicles from Naval Air Station–Key West and Florida Keys Community College.
Exhibit 6	Roadway Capacity, dated July 18, 2010, established by the Florida Department of Transportation

Exhibit 1
Table of Traffic Evacuation Zone (TEZ) Occupancy Data: Hotel, Motel and Other Vacation Rental (Tourist) Units

TEZ	Monroe County Tourist Development Council Districts	Total	Occupancy Rate for July	Occupied Total for July	Occupancy Rate for September	Occupied Total for September	Occupancy Rate for October	Occupied Total for October	Occupancy Rate for November	Occupied Total for November	Occupancy Rate for Hurricane Season	Occupied Total for Hurricane Season
1208	Key West	1,993	90.50%	1,804	63.20%	1,260	74.70%	1,489	85.20%	1,698	79.40%	1,582
1209	Key West	1,696	90.50%	1,535	63.20%	1,072	74.70%	1,267	85.20%	1,445	79.40%	1,347
1210	Key West	162	90.50%	147	63.20%	102	74.70%	121	85.20%	138	79.40%	129
1211	Key West	1,144	90.50%	1,035	63.20%	723	74.70%	855	85.20%	975	79.40%	908
1212	Key West	210	90.50%	190	63.20%	133	74.70%	157	85.20%	179	79.40%	167
1213	Key West	0	90.50%	0	63.20%	0	74.70%	0	85.20%	0	79.40%	0
1214	Key West	31	90.50%	28	63.20%	20	74.70%	23	85.20%	26	79.40%	25
1215	Key West	230	90.50%	208	63.20%	145	74.70%	172	85.20%	196	79.40%	183
1216	Key West	992	90.50%	898	63.20%	627	74.70%	741	85.20%	845	79.40%	788
1217	Monroe w/o Key West*	1	75.90%	1	45.30%	0	52.80%	1	63.50%	1	61.80%	1
1218	Monroe w/o Key West*	25	75.90%	19	45.30%	11	52.80%	13	63.50%	16	61.80%	15
1219	Monroe w/o Key West*	1	75.90%	1	45.30%	0	52.80%	1	63.50%	1	61.80%	1
1220	Monroe w/o Key West*	1	75.90%	1	45.30%	0	52.80%	1	63.50%	1	61.80%	1
1221	Monroe w/o Key West*	136	75.90%	103	45.30%	62	52.80%	72	63.50%	86	61.80%	84
1222	Monroe w/o Key West*	105	75.90%	80	45.30%	48	52.80%	55	63.50%	67	61.80%	65
1223	Monroe w/o Key West*	82	75.90%	62	45.30%	37	52.80%	43	63.50%	52	61.80%	51
1224	Monroe w/o Key West*	217	75.90%	165	45.30%	98	52.80%	115	63.50%	138	61.80%	134
1225	Monroe w/o Key West*	6	75.90%	5	45.30%	3	52.80%	3	63.50%	4	61.80%	4
1226	Marathon	496	79.00%	392	44.90%	223	52.90%	262	62.30%	309	63.10%	313
1227	Marathon	191	79.00%	151	44.90%	86	52.90%	101	62.30%	119	63.10%	121
1228	Marathon	1,461	79.00%	1,154	44.90%	656	52.90%	773	62.30%	910	63.10%	922
1229	Marathon	576	79.00%	455	44.90%	259	52.90%	305	62.30%	359	63.10%	363
1230	Islamorada	87	67.50%	59	40.30%	35	46.10%	40	58.50%	51	54.80%	48
1231	Islamorada	173	67.50%	117	40.30%	70	46.10%	80	58.50%	101	54.80%	95
1232	Islamorada	202	67.50%	136	40.30%	81	46.10%	93	58.50%	118	54.80%	111
1233	Islamorada	1,156	67.50%	780	40.30%	466	46.10%	533	58.50%	676	54.80%	633
1234	Islamorada	106	67.50%	72	40.30%	43	46.10%	49	58.50%	62	54.80%	58
1235	Islamorada	103	67.50%	70	40.30%	42	46.10%	47	58.50%	60	54.80%	56
1236	Key Largo	21	77.80%	16	47.90%	10	55.90%	12	67.30%	14	64.20%	13
1237	Key Largo	169	77.80%	131	47.90%	81	55.90%	94	67.30%	114	64.20%	108
1238	Key Largo	52	77.80%	40	47.90%	25	55.90%	29	67.30%	35	64.20%	33
1239	Key Largo	212	77.80%	165	47.90%	102	55.90%	119	67.30%	143	64.20%	136
1240	Key Largo	840	77.80%	654	47.90%	402	55.90%	470	67.30%	565	64.20%	539
1241	Key Largo	232	77.80%	180	47.90%	111	55.90%	130	67.30%	156	64.20%	149
1242	Key Largo	1	77.80%	1	47.90%	0	55.90%	1	67.30%	1	64.20%	1
1243	Key Largo	186	77.80%	145	47.90%	89	55.90%	104	67.30%	125	64.20%	119
1244	Key Largo	284	77.80%	221	47.90%	136	55.90%	159	67.30%	191	64.20%	182
1245	Key Largo	85	77.80%	66	47.90%	41	55.90%	48	67.30%	57	64.20%	55
1246	Key Largo	0	77.80%	0	47.90%	0	55.90%	0	67.30%	0	64.20%	0
1247	Key Largo	0	77.80%	0	47.90%	0	55.90%	0	67.30%	0	64.20%	0
Total of Units		**13,665**		**11,287**		**7,299**		**8,578**		**10,034**		**9,540**

*The "Big Pine Key and Lower Keys" District did not participate in the current Smith Travel Research survey.

For the purposes of the TIME Model, the Lower Keys will be using "Monroe County w/o Key West" as default occupancy.

Source data: Monroe County Tourist Development Council; Smith Travel Research 2012: Historic Trend Report; Department of Business and Professional Regulation: Division of Hotels and Resturants; 2010 Statewide Regional Evacuation Study: South Florida Region

Exhibit 2

Table of Traffic Evacuation Zone (TEZ) Occupancy Data: Site-Built and Mobile Home Units

TEZ	Sub-County Location	Site-Built			Mobile Home		
		Total	Occupancy Rate	Occupied Total	Total	Occupancy Rate	Occupied Total
1208	Key West	2,196	67.85%	1,490	1	100.00%	1
1209	Key West	2,252	65.32%	1,471	69	100.00%	69
1210	Key West	1,387	87.89%	1,219	8	100.00%	8
1211	Key West	2,779	77.69%	2,159	42	100.00%	42
1212	Key West	514	92.61%	476	0	0.00%	0
1213	Key West	1,069	87.65%	937	365	96.44%	352
1214	Key West	289	85.35%	247	10	100.00%	10
1215	Key West	1,586	77.96%	1,236	15	100.00%	15
1216	Key West	699	78.40%	548	10	100.00%	10
1217	Key West	610	81.97%	500	576	89.06%	513
1218	Key West	106	84.91%	90	304	79.28%	241
1219	Key West	448	86.61%	388	0	0.00%	0
1220	Lower Keys	1,041	86.36%	899	517	56.87%	294
1221	Lower Keys	1,112	71.22%	792	50	100.00%	50
1222	Lower Keys	1,521	55.03%	837	472	40.25%	190
1223	Lower Keys	2,477	66.98%	1,659	376	48.14%	181
1224	Lower Keys	1,174	59.20%	695	343	62.97%	216
1225	Lower Keys	464	63.79%	296	20	100.00%	20
1226	Middle Keys	747	56.09%	419	458	77.95%	357
1227	Middle Keys	1,613	58.15%	938	204	69.12%	141
1228	Middle Keys	3,854	49.35%	1,902	298	45.64%	136
1229	Middle Keys	1,093	37.60%	411	192	44.79%	86
1230	Middle Keys	258	62.79%	162	422	9.01%	38
1231	Middle Keys	1,155	34.37%	397	9	66.67%	6
1232	Upper Keys	525	57.52%	302	123	33.33%	41
1233	Upper Keys	273	57.88%	158	64	34.38%	22
1234	Upper Keys	885	49.83%	441	122	53.28%	65
1235	Upper Keys	2,299	57.16%	1,314	79	37.98%	30
1236	Upper Keys	619	53.96%	334	162	54.94%	89
1237	Upper Keys	933	52.52%	490	366	45.63%	167
1238	Upper Keys	377	75.86%	286	177	20.90%	37
1239	Upper Keys	1,509	55.53%	838	105	2.86%	3
1240	Upper Keys	1,547	46.15%	714	371	46.90%	174
1241	Upper Keys	1,009	79.58%	803	293	49.15%	144
1242	Upper Keys	487	63.24%	308	809	48.21%	390
1243	Upper Keys	1,114	52.96%	590	649	63.64%	413
1244	Upper Keys	605	32.23%	195	10	50.00%	5
1245	Upper Keys	1,071	34.08%	365	32	46.88%	15
1246	Mainland Monroe	4	50.00%	2	11	45.46%	5
1247	Mainland Monroe	17	70.59%	12	0	0.00%	0
Totals		**43,718**		**27,320**	**8,134**		**4,576**

Source data: 2010 US Census and 2006-2010 American Community Survey for Monroe County

Exhibit 3

Table of Traffic Evacuation Zone (TEZ) Vehicle Per Unit Data: Site-Built, Mobile Home and Tourist Units

TEZ	Sub-County Location	Site-Built			Mobile Home			Tourist (based on July Occupancy)		
		Occupied Units	Vehicle per Unit	Total Vehicles	Occupied Units	Vehicle per Unit	Total Vehicles	Occupied Units	Vehicle per Unit	Total Vehicles
1208	Key West	1,490	1.08859	1,622	1	1.00000	1	1,804	1.1	1,984
1209	Key West	1,471	0.99544	1,464	69	0.85507	59	1,535	1.1	1,689
1210	Key West	1,219	1.36423	1,663	8	1.37500	11	147	1.1	162
1211	Key West	2,159	1.41147	3,048	42	1.45238	61	1,035	1.1	1,139
1212	Key West	476	1.22899	585	0	0.00000	0	190	1.1	209
1213	Key West	937	1.31910	1,236	352	1.36080	479	0	1.1	0
1214	Key West	247	1.45398	359	10	1.50000	15	28	1.1	31
1215	Key West	1,236	1.29993	1,607	15	1.26667	19	208	1.1	229
1216	Key West	548	1.31934	723	10	1.30000	13	898	1.1	988
1217	Key West	500	1.40800	704	513	1.40156	719	1	1.1	1
1218	Key West	90	1.64444	148	241	1.63900	395	19	1.1	21
1219	Key West	388	0.00000	0	0	0.00000	0	1	1.1	1
1220	Lower Keys	899	1.22914	1,105	294	0.62925	185	1	1.1	1
1221	Lower Keys	792	1.92045	1,521	50	1.92000	96	103	1.1	113
1222	Lower Keys	837	1.24134	1,039	190	1.60000	304	80	1.1	88
1223	Lower Keys	1,659	1.41772	2,352	181	1.70166	308	62	1.1	68
1224	Lower Keys	695	1.01727	707	216	1.71759	371	165	1.1	182
1225	Lower Keys	296	1.75000	518	20	1.70000	34	5	1.1	6
1226	Middle Keys	419	0.94033	394	357	1.03081	368	392	1.1	431
1227	Middle Keys	938	1.51386	1,420	141	1.39716	197	151	1.1	166
1228	Middle Keys	1,902	1.71451	3,261	136	1.75735	239	1,154	1.1	1,269
1229	Middle Keys	411	1.52555	627	86	1.58140	136	455	1.1	501
1230	Middle Keys	162	1.71605	278	38	1.71053	65	59	1.1	65
1231	Middle Keys	397	1.62972	647	6	1.66667	10	117	1.1	129
1232	Upper Keys	302	1.89073	571	41	1.90244	78	136	1.1	150
1233	Upper Keys	158	1.88608	298	22	1.86364	41	780	1.1	858
1234	Upper Keys	441	0.00000	0	65	0.00000	0	72	1.1	79
1235	Upper Keys	1,314	1.86758	2,454	30	1.76667	53	70	1.1	77
1236	Upper Keys	334	1.79042	598	89	1.78652	159	16	1.1	18
1237	Upper Keys	490	1.32245	648	167	0.93413	156	131	1.1	144
1238	Upper Keys	286	1.60140	458	37	1.56757	58	40	1.1	44
1239	Upper Keys	838	1.95346	1,637	3	2.00000	6	165	1.1	182
1240	Upper Keys	714	1.88936	1,349	174	1.40230	244	654	1.1	719
1241	Upper Keys	803	1.81071	1,454	144	1.83333	264	180	1.1	198
1242	Upper Keys	308	1.42532	439	390	1.40513	548	1	1.1	1
1243	Upper Keys	590	2.12881	1,256	413	1.93220	798	145	1.1	160
1244	Upper Keys	195	0.46154	90	5	1.60000	8	221	1.1	243
1245	Upper Keys	365	0.81096	296	15	1.86667	28	66	1.1	73
1246	Mainland Monroe	2	1.50000	3	5	1.40000	7	0	1.1	0
1247	Mainland Monroe	12	0.00000	0	0	0.00000	0	0	1.1	0
Totals		**27,320**		**38,579**	**4,576**		**6,533**	**11,287**		**12,416**

Source data: 2010 US Census and 2006-2010 American Community Survey for Monroe County; Smith Travel Research 2012: Historic Trend Report; 2010 Statewide Regional Evacuation Study: South Florida Region

Exhibit 4

Table of Traffic Evacuation Zone (TEZ) Vehicle Use Rate Data: Site-Built, Mobile Home and Tourist Units

TEZ	Sub-County Location	Site-Built			Mobile Home			Tourist (based on July Occupancy)		
		Total Vehicles	Vehicle Use Rate	Available Vehicles	Total Vehicles	Vehicle Use Rate	Available Vehicles	Total Vehicles	Vehicle Use Rate	Available Vehicles
1208	Key West	1,622	90%	1,460	1	90%	1	1,984	100%	1984
1209	Key West	1,464	90%	1,318	59	90%	53	1,689	100%	1,689
1210	Key West	1,663	90%	1,497	11	90%	10	162	100%	162
1211	Key West	3,048	90%	2,743	61	90%	55	1,139	100%	1,139
1212	Key West	585	90%	526	0	90%	0	209	100%	209
1213	Key West	1,236	90%	1,112	479	90%	431	0	100%	0
1214	Key West	359	90%	323	15	90%	14	31	100%	31
1215	Key West	1,607	90%	1,447	19	90%	17	229	100%	229
1216	Key West	723	90%	651	13	90%	12	988	100%	988
1217	Key West	704	90%	634	719	90%	647	1	100%	1
1218	Key West	148	90%	133	395	90%	356	21	100%	21
1219	Key West	0	90%	0	0	90%	0	1	100%	1
1220	Lower Keys	1,105	75%	829	185	75%	139	1	100%	1
1221	Lower Keys	1,521	75%	1,141	96	75%	72	113	100%	113
1222	Lower Keys	1,039	75%	779	304	75%	228	88	100%	88
1223	Lower Keys	2,352	75%	1,764	308	75%	231	68	100%	68
1224	Lower Keys	707	75%	530	371	75%	278	182	100%	182
1225	Lower Keys	518	75%	388	34	75%	26	6	100%	6
1226	Middle Keys	394	80%	315	368	80%	294	431	100%	431
1227	Middle Keys	1,420	80%	1,136	197	80%	158	166	100%	166
1228	Middle Keys	3,261	80%	2,609	239	80%	191	1,269	100%	1,269
1229	Middle Keys	627	80%	502	136	80%	109	501	100%	501
1230	Middle Keys	278	80%	222	65	80%	52	65	100%	65
1231	Middle Keys	647	80%	518	10	80%	8	129	100%	129
1232	Upper Keys	571	85%	485	78	85%	66	150	100%	150
1233	Upper Keys	298	85%	253	41	85%	35	858	100%	858
1234	Upper Keys	0	85%	0	0	85%	0	79	100%	79
1235	Upper Keys	2,454	85%	2,086	53	85%	45	77	100%	77
1236	Upper Keys	598	85%	508	159	85%	135	18	100%	18
1237	Upper Keys	648	85%	551	156	85%	133	144	100%	144
1238	Upper Keys	458	85%	389	58	85%	49	44	100%	44
1239	Upper Keys	1,637	85%	1,391	6	85%	5	182	100%	182
1240	Upper Keys	1,349	85%	1,147	244	85%	207	719	100%	719
1241	Upper Keys	1,454	85%	1,236	264	85%	224	198	100%	198
1242	Upper Keys	439	85%	373	548	85%	466	1	100%	1
1243	Upper Keys	1,256	85%	1,068	798	85%	678	160	100%	160
1244	Upper Keys	90	85%	76	8	85%	7	243	100%	243
1245	Upper Keys	296	85%	252	28	85%	24	73	100%	73
1246	Mainland Monroe	3	75%	2	7	80%	6	0	100%	0
1247	Mainland Monroe	0	75%	0	0	80%	0	0	100%	0
Totals		**38,579**		**32,394**	**6,533**		**5,461**	**12,416**		**12,416**

Source data: 2010 US Census and 2006-2010 American Community Survey for Monroe County; Smith Travel Research 2012: Historic Trend Report; 2010 Statewide Regional Evacuation Study: South Florida Region

Exhibit 5 Table of Traffic Evacuation Zone (TEZ) Data: Special Population				
TEZ	**Sub-County Location**	**Special Population Type**	**Originating Location**	**Number of Beds/Vehicles Used**
1216	Key West	University Population	Florida Keys Community College - Blue Lagoon Residence Hall	100 vehicles
1220	Lower Keys	NAS Key West Personnel	NAS Key West - Boca Chica	2,338 vehicles

Source data: Naval Air Station (NAS) Key West; Florida Keys Community College

Exhibit 6

Maximum Sustainable Traffic Flow Rates per Functional Evacuation Lane: US Highway 1 (Overseas Highway) and CR 905/Card Sound Road in the Florida Keys, Monroe County, Florida

Area	Milemarkers		Location/Description	Functional Evacuation Lane	Maximum Sustainable Flow Rate per Functional Lane
	From	To			
Lower Keys	2	4	Key West to Stock Island	2	900
Lower Keys	4	9	Stock Island To Big Coppitt Key	2	900
Lower Keys	9	17	Big Coppitt to Sugarloaf Key	1	1,100
Lower Keys	17	22	Sugarloaf to Cudjoe Key	1	1,100
Lower Keys	22	24	Cudjoe Key to Summerland Key Cove Airport	1	1,100
Lower Keys	24	25	Summerland Key Cove Airport to Summerland Key	1	1,100
Lower Keys	25	30	Summerland Key to Big Pine Key	1	1,100
Lower Keys	30	34	Big Pine Key to West Summerland Keys	1	1,050
Lower Keys	34	35.2	West Summerland Keys to Spanish Harbor Keys	1	1,100
Lower Keys	35.2	36.5	Spanish Harbor Keys to Bahia Honda Bridge	2	1,100
Lower Keys	36.5	37.5	Bahia Honda Bridge to Bahia Honda Key	1	1,100
Middle Keys	37.5	47	Bahia Honda Key to Hog Key	1	1,200
Middle Keys	47	48	Hog Key to Boot Key	1	1,100
Middle Keys	48	50.2	Boot Key to Marathon	2	900
Middle Keys	50.2	58	Marathon to Marathon Shores	2	900
Middle Keys	50.8	54	Marathon Shores to Key Colony Beach	2	900
Middle Keys	54	54.5	Key Colony Beach to Deer Key	2	900
Middle Keys	54.5	58	Deer Key to Grassy Key	1	1,100
Upper Keys	58	74	Grassy Key to Matecumbe Harbor	1	1,100
Upper Keys	74	80	Matecumbe Harbor to Teatable Key	1	1,100
Upper Keys	80	83.5	Teatable Key to Islamorada	1	1,100
Upper Keys	83.5	85.6	Islamorada to Windley Key	1	1,100
Upper Keys	85.6	90	Windley Key to Plantation Key	1	1,100
Upper Keys	90	100	Tavernier Key to Newport Key	2	900
Upper Keys	100	105	Newport Key to Sexton Cove	2	900
Upper Keys	105	106.3	Sexton Cove to Rattlesnake Key	2	900
Upper Keys	106.3	126.5	Rattlesnake Key to Card Sound Road	1	1,200
Upper Keys	126.5	HEFT	Card Sound Road to HEFT	1	900

Exhibit 6

Maximum Sustainable Traffic Flow Rates per Functional Evacuation Lane: US Highway 1 (Overseas Highway) and CR 905/Card Sound Road in the Florida Keys, Monroe County, Florida

Area	Milemarkers		Location/Description	Functional Evacuation Lane	Maximum Sustainable Flow Rate per Functional Lane
	From	To			
Upper Keys	106.3	Int CR 905/CR 905A	Lake Surprise to Crocodile Lake	1	1,100
Upper Keys	Ocean Reef	Int CR 905/CR 905A	Tanglefish Key to Crocodile Lake	1	1,100
Upper Keys	Int CR 905/CR 905A	US1	Crocodile Lake to South Miami Dade	1	1,100

Source data: Florida Department of Transportation: Letter to Department of Community Affairs on June 18, 2010 - Tables 2A and 2B; Statewide Regional Evacuation Study for the South Florida Region

Appendix G

CHAPTER 28-18
LAND PLANNING REGULATIONS
FOR THE FLORIDA KEYS AREA OF CRITICAL STATE CONCERN – CITY OF MARATHON

28-18.100 Purpose and Effect (Repealed)
28-18.200 Comprehensive Plan (Repealed)
28-18.300 Purpose and Effect
28-18.400 Comprehensive Plan

28-18.100 Purpose and Effect.

Rulemaking Authority 380.0552(9) FS. Law Implemented 380.0552 FS. History–New 10-29-02, Repealed 11-28-05.

28-18.200 Comprehensive Plan.

Rulemaking Authority 380.0552(9) FS. Law Implemented 380.0552 FS. History–New 10-29-02, Repealed 11-28-05.

28-18.300 Purpose and Effect.

As provided in Sections 380.05(10) and 380.0552(7), F.S., the Comprehensive Plan of the City of Marathon shall be superseded by amendments which are proposed by Marathon and approved by the Department of Commerce pursuant to Sections 380.05(6) and 380.0552(9), F.S.

Rulemaking Authority 380.0552(9), 380.05(22) FS. Law Implemented 380.0552 FS. History–New 6-17-11.

28-18.400 Comprehensive Plan.

(1) The Comprehensive Plan of the City of Marathon, as the same exists on January 1, 2011, is hereby amended to read as follows:

(2) Policy 1-3.5.18 Marathon Work Program Conditions and Objectives.

(a) The number of allocations issued annually for residential development under the Residential Building Permit Allocation System (BPAS) shall not exceed a total annual unit cap of 30, plus any available unused BPAS allocations from a previous year. Unused BPAS allocations may be retained and made available only for affordable housing and Administrative Relief from BPAS year to BPAS year. Unused market rate allocations shall be available for Administrative Relief. Any unused affordable allocations will roll over to affordable housing. This BPAS allocation represents the total number of allocations for development that may be issued during a year. A BPAS year means the twelve-month period beginning on July 13. Policy 1-3.5.18 supersedes Policy 1-3.5.2 of the City of Marathon Comprehensive Plan.

(b) No exemptions or increases in the number of allocations may be allowed, other than that which may be expressly provided for in the comprehensive plan or for which there is an existing agreement as of September 27, 2005, for affordable housing between the Department and the local government in the critical areas.

(c) Through the Permit Allocation Systems, Marathon shall direct new growth and redevelopment to areas served by a central sewer system by 2015 that has committed or planned funding sources. Committed or planned funding is funding that is financially feasible and reflected in a Capital Improvements Element approved by the Department of Commerce. Prior to the ranking and approval of awards for an allocation authorizing development of new principal structures. Marathon shall coordinate with the central wastewater facility provider and shall increase an applicant's score by four points for parcels served by a collection line within a central wastewater facility service area where a central wastewater treatment facility has been constructed that meets the treatment standards of Sections 381.0065(4)(l) and 403.086(10), F.S., and where treatment capacity is available. The points shall only be awarded if a construction permit has been issued for the collection system and the parcel lies within the service area of the wastewater treatment facility.

(3) Reporting and Oversight.

(a) Beginning November 30, 2011, Marathon and the Department of Commerce shall annually report to the Administration Commission documenting the degree to which the work program objectives for the work program year have been achieved. The Commission shall consider the findings and recommendations provided in those reports and shall determine whether progress has

been achieved toward accomplishing the tasks of the work program. If the Commission determines that progress has not been made, the unit cap for residential development shall be reduced by 20 percent for the following year.

(b) If the Commission determines that progress has been made for the work program year, then the Commission shall restore the unit cap for residential development for the following year up to a maximum of 30 allocations per BPAS year.

(c) Notwithstanding any other date set forth in this plan, the dates set forth in the work program shall control where conflicts exist.

(d) Wastewater treatment and disposal in Marathon is governed by the requirements of Sections 381.0065(4)(l) and 403.086(10), F.S., as amended. Nothing in this rule shall be construed to limit the authority of the Department of Environmental Protection or Department of Health to enforce Sections 381.0065(4)(1) and 403.086(10), F.S., as amended.

(4) Policy 1-2.2.4 Hurricane Modeling.

For hurricane evacuation clearance time modeling purposes, clearance time shall begin when the Monroe County Emergency Management Coordinator issues the evacuation order for the permanent population for a hurricane that is classified as a Category 3-5 wind event or Category C-E surge event. The termination point shall be the intersection of U.S. Highway One and the Florida Turnpike in Homestead/Florida City.

(5) WORK PROGRAM.

(a) Carrying Capacity Study Implementation.

1. By July 1, 2011, and each July thereafter, Marathon shall evaluate its land acquisition needs and state and federal funding opportunities and apply annually to at least one state or federal land acquisition funding opportunity.

2. By July 1, 2012, Marathon shall enter into a memorandum of understanding with the Department of Commerce, Division of Emergency Management, Monroe County, Islamorada, Key West, Key Colony Beach, and Layton after a notice and comment period of at least 30 days for interested parties. The memorandum of understanding shall stipulate, based on professionally acceptable data and analysis, the input variables and assumptions, including regional considerations, for utilizing the Florida Keys Hurricane Evacuation Model or other models acceptable to the Department of Commerce to accurately depict evacuation clearance times for the population of the Florida Keys.

3. By July 1, 2012, the Florida Keys Hurricane Evacuation Model shall be run with the agreed upon variables from the memorandum of understanding. Marathon and the Department of Commerce shall update the data for the Florida Keys Hurricane Evacuation Model as professionally acceptable sources of information are released (such as the Census, American Communities Survey, Bureau of Business and Economic Research, and other studies). The City shall also evaluate and address appropriate adjustments to the hurricane evacuation model within each Evaluation and Appraisal Report.

4. By December 1, 2012, Marathon shall complete an analysis of maximum build-out capacity for the Florida Keys Area of Critical State Concern, consistent with the requirement to maintain a 24-hour evacuation clearance time and the Florida Keys Carrying Capacity Study constraints. This analysis shall be prepared in coordination with the Department of Commerce, Monroe County and each municipality in the Keys.

5. By December 1, 2012, the Department of Commerce shall apply the derived clearance time to assess and determine the remaining allocations for the Florida Keys Areas of Critical State Concern. The Department will recommend appropriate revisions to the Administration Commission regarding the allocation rates and distribution of allocations to Monroe County, Marathon, Islamorada, Key West, Layton and Key Colony Beach or identify alternative evacuation strategies that support the 24-hour hurricane evacuation clearance time. If necessary, the Department of Commerce shall work with each local government to amend the respective Comprehensive Plans to reflect revised allocation rates and distributions or propose rule making to the Administration Commission.

6. By July 1, 2013, based on the Department of Commerce's recommendations, Marathon shall amend the current building permit allocation system (BPAS in the Comprehensive Plan and Land Development Regulations) based on infrastructure availability, level of service standards, environmental carrying capacity, and hurricane evacuation clearance time.

(b) Wastewater Implementation.

1. By July 1, 2011 and each July 1 thereafter, Marathon shall annually evaluate and allocate funding for wastewater implementation. Marathon shall identify any funding in the annual update to the Capital Improvements Element of the Comprehensive Plan.

2. By July 1, 2011, Marathon shall evaluate its wastewater needs and state and federal funding opportunities and apply annually to at least one state or federal funding opportunity for wastewater projects and connections.

(c) Canal Restoration Implementation

1. By December 30, 2020, Marathon and its partners shall update the 2013 Canal Management Master Plan (CCMP) to include any updated water quality assessment of canals, a methodology to prioritize need for water quality improvement, appropriate restoration options and revised canal rankings based on new information.

2. By December 30, 2020, Marathon shall develop and adopt guidelines to select canals for restoration, including a process to evaluate the feasibility of the project, the proposed restoration design (evaluate long-term cost-effective solutions) and associated funding needs.

3. By December 30, 2020, and each year thereafter until 2030, the Department of Commerce shall work with each stakeholder, including but not limited to each local government, Environmental Protection Agency (EPA), United States Army Corps of Engineers (ACOE), Florida Department of Environmental Protection (DEP), National Oceanic and Atmospheric Administration (NOAA), Florida Keys National Marine Sanctuary (FKNMS), and the South Florida Water Management District (SFWMD) to facilitate intergovernmental coordination and expedite review of canal restoration projects within the Florida Keys.

4. By July 1, 2021, Marathon shall identify and evaluate funding sources for the implementation of canal restoration projects and the continual operation and maintenance of canals post restoration.

5. By July 1, 2021, and each year thereafter until 2030, Marathon shall identify canal restoration projects and implementation plans for each canal project. Marathon shall provide a list of selected canal restoration projects to the Department of Commerce by October 1st of each year to be completed during the following work program reporting period.

6. By July 1, 2021, and each year thereafter until 2030, Marathon shall evaluate its canal restoration needs and state and federal funding opportunities and apply annually to at least one state or federal funding opportunity for canal restoration projects.

7. By July 1, 2021 and each year thereafter until 2030, Marathon shall annually evaluate and allocate funding for canal restoration implementation. Marathon shall identify any funding in the annual update to the Capital Improvements Element (CIE) of the Comprehensive Plan.

8. By July 1, 2021, the Department of Commerce shall work with each stakeholder, including but not limited to each local government, EPA, ACOE, DEP, NOAA/FKNMS, SFWMD, to facilitate intergovernmental coordination and review of alternative solutions, including reduced regulatory costs, for canal systems that are susceptible to receiving large inputs of seagrass and other accumulated organic material from near shore waters.

9. By July 1, 2022, and each year thereafter until 2030, Marathon shall report which canal restoration projects have been initiated and projects that were completed during the reporting period to the Department of Commerce for submission to the Administration Commission.

10. By July 1, 2022, the Department of Commerce shall work with each stakeholder, including but not limited to each local government, EPA, ACOE, DEP, NOAA/FKNMS, SFWMD, to facilitate the permitting approval of the alternative solutions identified for canal systems with accumulated organic material issues to substantially reduce those inputs to levels that do not contribute to eutrophication, hypoxia, or other water and sediment quality issues within the canals.

11. By July 1, 2023, Marathon shall submit a plan to assess the effectiveness of completed canal restoration projects. The plan shall describe the methods, timeframes and potential funding sources to monitor the effectiveness of restoration projects based on water quality and ecological response factors. Marathon shall consult with the DEP Division of Environmental Assessment and Restoration to develop a cost-effective plan. The Department of Commerce will coordinate review of the completed plan with the DEP. Marathon shall account for agency review comments and modify the plan as necessary.

12. Beginning July 1, 2024, and annually thereafter until 2030, Marathon shall assess the effectiveness of canal restoration in accordance with the plan identified in subparagraph (5)(c)11. The DEP will make monitoring information related to Keys water quality available to Marathon to inform the assessment.

Rulemaking Authority 380.0552(9), 380.05(22) FS. Law Implemented 380.0552 FS. History–New 6-17-11, Amended 11-26-20.

Appendix H

CHAPTER 28-19
LAND PLANNING REGULATIONS FOR THE FLORIDA KEYS AREA OF CRITICAL STATE CONCERN, ISLAMORADA, VILLAGE OF ISLANDS

28-19.100 Purpose and Effect
28-19.200 Comprehensive Plan (Repealed)
28-19.310 Comprehensive Plan

28-19.100 Purpose and Effect.

(1) The purpose of this Chapter is to amend the Transitional Comprehensive Plan of Islamorada, Village of Islands, within the Florida Keys Area of Critical State Concern, pursuant to Section 380.0552(9), F.S.

(2) In order to provide an accurate record of the amendments approved by this chapter, each set of amendments is set forth in a separate rule section. If any provision of the comprehensive plan is amended by two rule sections, the latest amendment shall control.

(3) As provided in Sections 380.05(10) and 380.0552(7), F.S., the Transitional Comprehensive Plan of the Village adopted herein shall be superseded by amendments which are proposed by the Village and approved by the Department of Commerce pursuant to Sections 380.05(6) and 380.0552(9), F.S. The Village Transitional Comprehensive Plan shall be superseded by the new Village Comprehensive Plan upon approval by the Department of Commerce pursuant to Sections 380.05(6) and 380.0552(9), F.S.

Rulemaking Authority 380.0552(9) FS. Law Implemented 380.0552 FS. History–New 7-26-99.

28-19.200 Comprehensive Plan.

Rulemaking Authority 380.0552(9) FS. Law Implemented 380.0552 FS. History–New 7-26-99, Repealed 1-12-14.

28-19.310 Comprehensive Plan.

(1) The Comprehensive Plan of Islamorada, Village of Islands, as the same exists on January 1, 2011, is hereby amended to read as follows:

(2) Policy 1-3.1.1 Islamorada Work Program Conditions and Objectives.

(a) The number of permits issued annually for residential development under the Residential Building Permit Allocation System (BPAS) shall not exceed a total annual unit cap of 22 market rate units and 6 affordable housing units, plus any available unused BPAS allocations from the previous BPAS year. Unused BPAS allocations may be retained and made available only for affordable housing and Administrative Relief from BPAS year to BPAS year. Unused market rate allocations shall be available for Administrative Relief. Any unused affordable allocations will roll over to affordable housing. This BPAS allocation represents the total number of allocations for development that may be issued during a year. A BPAS year means the twelve-month period beginning on July 13.

(b) Beginning November 30, 2011, the Village and the Department of Commerce shall annually report to the Administration Commission documenting the degree to which the work program objectives for the work program year have been achieved. The Commission shall consider the findings and recommendations provided in those reports and shall determine whether progress has been achieved toward accomplishing the tasks of the work program. If the Commission determines that progress has not been made, the unit cap for residential development shall be reduced by 20 percent for the following year.

(3) Policy 2-1. 2.10 Hurricane Modeling.

For hurricane evacuation clearance time modeling purposes, clearance time shall begin when the Monroe County Emergency Management Coordinator issues the evacuation order for the permanent population for a hurricane that is classified as a Category 3-5 wind event or Category C-E surge event. The termination point shall be the intersection of U.S. Highway One and the Florida Turnpike in Homestead/Florida City.

(4) Reporting and Oversight.

(a) Through the Permit Allocation Systems, Islamorada shall direct new growth and redevelopment to areas served by or that would be served a central sewer system by December 2015, that has committed funding or planned funding sources. Committed or planned funding is funding that is financially feasible and reflected in a Capital Improvements Element approved by the Department of Commerce. Prior to the ranking and approval of awards for an allocation authorizing development of new principal structures, the

Village of Islamorada shall coordinate with the central wastewater facility provider and shall increase an applicant's score by two points for parcels served by a collection line within a central wastewater facility service area where a central wastewater treatment facility has been constructed that meets the treatment standards of Sections 381.0065(4)(1) and 403.086(10), F.S., and where treatment capacity is available. The points shall only be awarded if a construction permit has been issued for the collection system and the parcel lies within the service area of the wastewater treatment facility.

(b) If the Commission determines that progress has been made for the work program year, then the Commission shall restore the unit cap for residential development for the following year up to a maximum of 28 allocations per BPAS year.

(c) Wastewater treatment and disposal in Islamorada is governed by the requirements of Sections 381.0065(4)(1) and 403.086(10), F.S. Nothing in this rule shall be construed to limit the authority of the Department of Commerce or Department of Health to enforce Sections 381.0065(4)(1) and 403.086(10), F.S.

(d) Notwithstanding any other date set forth in this plan, the dates set forth in the work program shall control where conflicts exist.

(5) WORK PROGRAM.

(a) Carrying Capacity Implementation.

1. By July 1, 2011 and each July 1 thereafter, Islamorada shall evaluate its land acquisition needs and state and federal funding opportunities and apply to at least one state or federal land acquisition funding opportunity.

2. By July 1, 2012, Islamorada shall enter into a memorandum of understanding with the Department of Commerce, Division of Emergency Management, Marathon, Monroe, Key West, Key Colony Beach, and Layton after a notice, public workshop and comment period of at least 30 days for interested parties. The memorandum of understanding shall stipulate, based on professionally acceptable data and analysis, the input variables and assumptions, including regional considerations, for utilizing the Florida Keys Hurricane Evacuation Model or other models acceptable to the Department to accurately depict evacuation clearance times for the population of the Florida Keys.

3. By July 1, 2012, the Florida Keys Hurricane Evacuation Model shall be run with the agreed upon variables from the memorandum of understanding. Islamorada and the Department of Commerce shall update the data for the Florida Keys Hurricane Evacuation Model as professionally acceptable sources of information are released (such as the Census, American Communities Survey, Bureau of Business and Economic Research, and other studies). Islamorada shall also evaluate and address appropriate adjustments to the hurricane evacuation model within each Evaluation and Appraisal Report.

4. By July 1, 2012, Islamorada shall complete an analysis of maximum build-out capacity for the Florida Keys Area of Critical State Concern, consistent with the requirement to maintain a 24-hour evacuation clearance time and the Florida Keys Carrying Capacity Study constraints. This analysis shall be prepared in coordination with the Department of Commerce, Monroe County and each municipality in the Keys.

5. By July 1, 2012, the Department of Commerce shall apply the derived clearance time to assess and determine the remaining allocations for the Florida Keys Areas of Critical State Concern. The Department will recommend appropriate revisions to the Administration Commission regarding the allocation rates and distribution of allocations to Monroe County, Marathon, Islamorada, Key West, Layton and Key Colony Beach or identify alternative evacuation strategies that support the 24-hour evacuation clearance time. If necessary, Department of Commerce shall work with each local government to amend the Comprehensive Plans to reflect revised allocation rates and distributions or propose rule making to the Administration Commission.

6. By July 1, 2013, based on the Department of Commerce's recommendations, Islamorada shall amend the current building permit allocation system (BPAS in the Comprehensive Plan and Land Development Regulations) based on infrastructure availability, level of service standards, environmental carrying capacity constraints, and hurricane evacuation clearance time.

(b) Wastewater Implementation.

1. Beginning July 1, 2011 and each July 1 thereafter, Islamorada shall identify any funding for wastewater implementation. Islamorada shall identify any funding in the annual update to the Capital Improvements Element of the Comprehensive Plan.

2. By July 1, 2011 and by July 1 of each year thereafter, Islamorada shall evaluate its wastewater needs and state and federal funding opportunities and apply annually to at least one state or federal funding opportunity for wastewater projects and connections.

(c) Canal Restoration Implementation.

1. By December 30, 2020, Islamorada and its partners shall update the 2013 Canal Management Master Plan (CCMP) to include any updated water quality assessment of canals, a methodology to prioritize need for water quality improvement, appropriate

restoration options and revised canal rankings based on new information.

2. By December 30, 2020, Islamorada shall develop and adopt guidelines to select canals for restoration, including a process to evaluate the feasibility of the project, the proposed restoration design (evaluate long-term cost-effective solutions) and associated funding needs.

3. By December 30, 2020, and each year thereafter until 2030, the Department of Commerce shall work with each stakeholder, including but not limited to each local government, Environmental Protection Agency (EPA), United States Army Corps of Engineers (ACOE), Florida Department of Environmental Protection (DEP), National Oceanic and Atmospheric Administration (NOAA), Florida Keys National Marine Sanctuary (FKNMS), and the South Florida Water Management District to facilitate intergovernmental coordination and expedite review of canal restoration projects within the Florida Keys.

4. By July 1, 2021, Islamorada shall identify and evaluate funding sources for the implementation of canal restoration projects and the continual operation and maintenance of canals post restoration.

5. By July 1, 2021, and each year thereafter until 2030, Islamorada shall identify canal restoration projects and implementation plans for each canal project. Islamorada shall provide a list of selected canal restoration projects to the Department of Commerce by October 1st of each year to be completed during the following work program reporting period.

6. By July 1, 2021, and each year thereafter until 2030, Islamorada shall evaluate its canal restoration needs and state and federal funding opportunities and apply annually to at least one state or federal funding opportunity for canal restoration projects.

7. By July 1, 2021 and each year thereafter until 2030, Islamorada shall annually evaluate and allocate funding for canal restoration implementation. Islamorada shall identify any funding in the annual update to the Capital Improvements Element (CIE) of the Comprehensive Plan.

8. By July 1, 2021, the Department of Commerce shall work with each stakeholder, including but not limited to each local government, EPA, ACOE, DEP, NOAA/FKNMS, SFWMD, to facilitate intergovernmental coordination and review of alternative solutions, including reduced regulatory costs, for canal systems that are susceptible to receiving large inputs of seagrass and other accumulated organic matter from near shore waters.

9. By July 1, 2022, and each year thereafter until 2030, Islamorada shall report which canal restoration projects have been initiated and projects that were completed during the reporting period to the Department of Commerce for submission to the Administration Commission.

10. By July 1, 2022, the Department of Commerce shall work with each stakeholder, including but not limited to each local government, EPA, ACOE, DEP, NOAA/FKNMS, SFWMD, to facilitate the permitting approval of the alternative solutions identified for canal systems with accumulated organic matter issues to substantially reduce those inputs to levels that do not contribute to eutrophication, hypoxia, or other water and sediment quality issues within the canals.

11. By July 1, 2023, Islamorada shall submit a plan to assess the effectiveness of completed canal restoration projects. The plan shall describe the methods, timeframes and potential funding sources to monitor the effectiveness of restoration projects based on water quality and ecological response factors. Islamorada shall consult with the DEP Division of Environmental Assessment and Restoration to develop a cost-effective plan. The Department of Commerce will coordinate review of the completed plan with the DEP. Islamorada shall account for agency review comments and modify the plan as necessary.

12. Beginning July 1, 2024, and annually thereafter until 2030, Islamorada shall assess the effectiveness of canal restoration in accordance with the plan identified in subparagraph (5)(c)11. The DEP will make monitoring information related to Keys water quality available to Islamorada to inform the assessment.

Rulemaking Authority 380.0552(9), 380.05(22) FS. Law Implemented 380.0552 FS. History–New 6-17-11, Amended 11-26-20.

Appendix I

CHAPTER 28-20
LAND PLANNING REGULATIONS FOR THE FLORIDA KEYS AREA OF CRITICAL STATE CONCERN – MONROE COUNTY

28-20.019 Purpose and Effect
28-20.020 Comprehensive Plan (Repealed)
28-20.021 Land Development Regulations (Repealed)
28-20.022 Second Administration Commission Amendments to the Comprehensive Plan (Repealed)
28-20.023 Second Administration Commission Amendments to Land Development Regulations (Repealed)
28-20.024 Third Administration Commission Amendments to Land Development Regulations (Repealed)
28-20.025 Land Development Regulations (Repealed)
28-20.100 Comprehensive Plan (Repealed)
28-20.110 Comprehensive Plan (Repealed)
28-20.120 Land Development Regulations (Repealed)
28-20.140 Comprehensive Plan

28-20.019 Purpose and Effect.

(1) The purpose of this chapter is to establish land development regulations and a local comprehensive plan applicable within the Florida Keys Area of Critical State Concern, pursuant to Section 380.05(8), F.S. It is the intent of the Administration Commission that this rule shall supplement those land development regulations and those portions of the comprehensive plan approved by the Department of Commerce for the Florida Keys Area of Critical State Concern. To the extent that existing ordinances are not adopted in this rule or approved in Chapter 9J-14, F.A.C., such ordinances are not deemed to be "land development regulations" within the definition of Section 380.031(8), F.S.

(2) In order to provide an accurate record of the amendments approved by this chapter, each set of amendments is set forth in a separate rule section. If any provision of the comprehensive plan or the land development regulations is amended by two rule sections, the latest amendment shall control.

(3) As provided in Section 380.05(10), F.S., the comprehensive plan and land development regulations adopted herein shall be superseded by regulations or amendments which are proposed by Monroe County and approved by the Department of Commerce under the procedures found in Section 380.05(6), F.S.

(4) Land Development Regulations, including Official Land Use District Maps, shall be construed to implement the provisions of Chapter 163, F.S. (1985) and Chapter 86-170, Laws of Florida (1986).

(5) All development, in addition to being consistent with the provisions of these land development regulations which include the official land use district maps, shall be consistent with the goals, policies and objectives of the comprehensive plan. All land use decisions based upon the map designations must be consistent with the text of volumes I and II.

(6) The purpose of Part II of this chapter is to adopt amendments to the Monroe County Comprehensive Plan adopted by Monroe County Ordinance No. 016-1993, and approved by the Department of Commerce in Rules 9J-14.020-.023, F.A.C., including maps, consistent with the Principles for Guiding Development for the Florida Keys Area of Critical State Concern, pursuant to Sections 380.0552(7) and (9), F.S. The Monroe County Comprehensive Plan adopted by Ordinance 016-1993 and approved by the Department of Commerce in Rules 9J-14.020-.023, F.A.C., supersedes the Comprehensive Plan addressed in Part I of this chapter.

Rulemaking Authority 380.05(8), 380.0552(9) FS. Law Implemented 380.0552 FS. History–New 9-15-86, Amended 10-5-89, 1-2-96.

28-20.020 Comprehensive Plan.

Rulemaking Authority 380.05(8) FS. Law Implemented 380.05(8), 380.0552(4) FS. History–New 9-15-86, Repealed 1-12-14.

28-20.021 Land Development Regulations.

Rulemaking Authority 380.05(8) FS. Law Implemented 380.05(8), 380.0552(4) FS. History–New 9-15-86, Repealed 1-12-14.

28-20.022 Second Administration Commission Amendments to the Comprehensive Plan.

Rulemaking Authority 380.0552(9) FS. Law Implemented 380.0552 FS. History–New 10-5-89, Repealed 1-12-14.

28-20.023 Second Administration Commission Amendments to Land Development Regulations.

Rulemaking Authority 380.0552(9) FS. Law Implemented 380.0552 FS. History–New 10-5-89, Repealed 1-12-14.

28-20.024 Third Administration Commission Amendments to Land Development Regulations.

Rulemaking Authority 380.0552(9) FS. Law Implemented 380.0552 FS. History–New 8-12-92, Repealed 1-12-14.

28-20.025 Land Development Regulations.

Rulemaking Authority 380.0552(9) FS. Law Implemented 380.0552 FS. History–New 1-2-96, Repealed 1-12-14.

28-20.100 Comprehensive Plan.

Rulemaking Authority 380.05(8), 380.0552(9) FS. Law Implemented 380.0552 FS. History–New 1-2-96, Amended 7-17-97, 7-26-99, 10-29-02, Repealed 1-12-14.

28-20.110 Comprehensive Plan.

Rulemaking Authority 380.0552(9) FS. Law Implemented 380.0552 FS. History–New 9-27-05, Repealed 1-12-14.

28-20.120 Land Development Regulations.

Rulemaking Authority 380.0552(9) FS. Law Implemented 380.0552 FS. History–New 9-27-05, Repealed 1-12-14.

28-20.140 Comprehensive Plan.

(1) The Monroe County Comprehensive Plan Policy Document, as the same exists on January 1, 2011, is hereby amended to read as follows:

(2) Policy 101.2.13 Monroe County Work Program Conditions and Objectives.

(a) Monroe County shall establish and maintain a Permit Allocation System for new residential development. The Permit Allocation System shall supersede Policy 101.2.1.

(b) The number of permits issued annually for residential development under the Rate of Growth Ordinance shall not exceed a total annual unit cap of 197, plus any available unused ROGO allocations from a previous ROGO year. Each year's ROGO allocation of 197 units shall be split with a minimum of 71 units allocated for affordable housing in perpetuity and market rate allocations not to exceed 126 residential units per year. Unused ROGO allocations may be retained and made available only for affordable housing and Administrative Relief from ROGO year to ROGO year. Unused allocations for market rate shall be available for Administrative Relief. Any unused affordable allocations will roll over to affordable housing. A ROGO year means the twelve-month period beginning on July 13.

(c) This allocation represents the total number of allocations for development that may be issued during a ROGO year. No exemptions or increases in the number of allocations may be allowed, other than that which may be expressly provided for in the comprehensive plan or for which there is an existing agreement as of September 27, 2005, for affordable housing between the Department and the local government in the critical areas.

(d) Through the Permit Allocation Systems, Monroe County shall direct new growth and redevelopment to areas served or that would be served by a central sewer system by December 2015 that has committed or planned funding. Committed or planned funding is funding that is financially feasible and reflected in a Capital Improvements Element approved by the Department of Commerce. Prior to the ranking and approval of awards for an allocation authorizing development of new principal structures, Monroe County, shall coordinate with the central wastewater facility provider and shall increase an applicant's score by four points for parcels served by a collection line within a central wastewater facility service area where a central wastewater treatment facility has been constructed that meets the treatment standards of Section 403.086(10), F.S., and where treatment capacity is available. The points shall only be awarded if a construction permit has been issued for the collection system and the parcel lies within the service area of the wastewater treatment facility.

(3) Reporting and Oversight.

(a) Beginning November 30, 2011, Monroe County and the Department of Commerce shall annually report to the

Administration Commission documenting the degree to which the work program objectives for the work program year have been achieved. The Commission shall consider the findings and recommendations provided in those reports and shall determine whether progress has been achieved. If the Commission determines that progress has not been made, the unit cap for residential development shall be reduced by 20 percent for the following ROGO year.

(b) If the Commission determines that progress has been made for the work program year, then the Commission may restore the unit cap for residential development for the following year up to a maximum of 197 allocations per ROGO year.

(c) Notwithstanding any other date set forth in this plan, the dates set forth in the work program shall control where conflicts exist.

(d) Wastewater treatment and disposal in Monroe County is governed by the requirements of Sections 381.0065(4) and 403.086(10), F.S. Nothing in this rule shall be construed to limit the authority of the Department of Environmental Protection or the Department of Health to enforce Sections 381.0065(4) and 403.086(10), F.S.

(4) Policy 216.1.19. Hurricane Modeling.

For the purposes of hurricane evacuation clearance time modeling purposes, clearance time shall begin when the Monroe County Emergency Management Coordinator issues the evacuation order for permanent residents for a hurricane that is classified as a Category 3-5 wind event or Category C-E surge event. The termination point shall be U.S. Highway One and the Florida Turnpike in Homestead/Florida City.

(5) WORK PROGRAM.

(a) Carrying Capacity Study Implementation.

1. Prior to the County adopting a resolution recommending the removal of the designation of Monroe County as an Area of Critical State Concern, pursuant to Section 380.0552(4)(b)3., F.S., Monroe County shall adopt the conservation planning mapping (the Tier Zoning Overlay Maps and System) into the Comprehensive Plan as an overlay to the Future Land Use Map.

2. By July 1, 2012 and each July thereafter, Monroe County and the Monroe County Land Authority shall submit a report annually to the Administration Commission on the land acquisition funding and efforts in the Florida Keys to purchase Tier I and Big Pine Key Tier II lands and the purchase of parcels where a Monroe County building permit allocation has been denied for four (4) years or more. The report shall include an identification of all sources of funds and assessment of fund balances within those sources available to the County and the Monroe County Land Authority.

3. By July 1, 2011, Monroe County shall evaluate its land acquisition needs and state and federal funding opportunities and apply annually to at least one state or federal land acquisition funding opportunity.

4. By July 1, 2012, Monroe County shall enter into a memorandum of understanding with the Department of Commerce, Division of Emergency Management, Marathon, Islamorada, Key West, Key Colony Beach and Layton after a notice and comment period of at least 30 days for interested parties. The memorandum of understanding shall stipulate, based on professionally acceptable data and analysis, the input variables and assumptions, including regional considerations, for utilizing the Florida Keys Hurricane Evacuation Model or other models acceptable to the Department to accurately depict evacuation clearance times for the population of the Florida Keys.

5. By July 1, 2012, the Florida Keys Hurricane Evacuation Model shall be run with the agreed upon variables from the memorandum of understanding to complete an analysis of maximum build-out capacity for the Florida Keys Area of Critical State Concern, consistent with the requirement to maintain a 24-hour evacuation clearance time and the Florida Keys Carrying Capacity Study constraints. This analysis shall be prepared in coordination with the Department of Commerce and each municipality in the Keys.

6. By July 1, 2012, the County and the Department of Commerce shall update the data for the Florida Keys Hurricane Evacuation Model as professionally acceptable sources of information are released (such as the Census, American Communities Survey, Bureau of Economic and Business Research, and other studies). The County shall also evaluate and address appropriate adjustments to the hurricane evacuation model within each Evaluation and Appraisal Report.

7. By July 1, 2012, the Department of Commerce shall apply the derived clearance time to assess and determine the remaining allocations for the Florida Keys Areas of Critical State Concern. The Department will recommend appropriate revisions to the Administration Commission regarding the allocation rates and distribution of allocations to Monroe County, Marathon, Islamorada, Key West, Layton and Key Colony Beach or identify alternative evacuation strategies that support the 24 hour evacuation clearance time. If necessary, the Department of Commerce shall work with each local government to amend the Comprehensive Plans to reflect revised allocation rates and distributions or propose rulemaking to the Administration Commission.

8. By July 1, 2013, if necessary, the Department of Commerce shall work with each local government to amend the Comprehensive Plan to reflect revised allocation rates and distribution or propose rule making to the Administration Commission.

(b) Wastewater Implementation.

1. By July 1, 2011, Monroe County shall annually evaluate and allocate funding for wastewater implementation. Monroe County shall identify any funding in the annual update to the Capital Improvements Element of the Comprehensive Plan.

2. By July 1, 2011, Monroe County shall evaluate its wastewater needs and state and federal funding opportunities and apply annually to at least one state or federal funding opportunity for wastewater projects and connections.

(c) Wastewater Project Implementation.

1. Key Largo Wastewater Treatment Facility. Key Largo Wastewater Treatment District is responsible for wastewater treatment in its service area and the completion of the Key Largo Wastewater Treatment Facility.

2. Hawk's Cay, Duck Key and Conch Key Wastewater Treatment Facility.

By July 1, 2014, Monroe County shall complete all remaining connections to Hawk's Cay WWTP.

3. South Lower Keys Wastewater Treatment Facility (Big Coppitt Regional System).

By July 1, 2013, Monroe County shall complete all remaining connections to the South Lower Keys WWTP.

4. Cudjoe Regional Wastewater Treatment Facility.

By December 1, 2015, Monroe County shall complete remaining hook-ups to Cudjoe Regional WWTP.

(d) Canal Restoration Implementation.

1. By December 30, 2020, Monroe County and its partners shall update the 2013 Canal Management Master Plan (CCMP) to include any updated water quality assessment of canals, a methodology to prioritize need for water quality improvement, appropriate restoration options and revised canal rankings based on new information.

2. By December 30, 2020, Monroe County shall develop and adopt guidelines to select canals for restoration, including a process to evaluate the feasibility of the project, the proposed restoration design (evaluate long-term cost-effective solutions) and associated funding needs.

3. By December 30, 2020, and each year thereafter until 2030, the Department of Commerce shall work with each stakeholder, including but not limited to each local government, Environmental Protection Agency (EPA), United States Army Corps of Engineers (ACOE), Florida Department of Environmental Protection (DEP), National Oceanic and Atmospheric Administration (NOAA), Florida Keys National Marine Sanctuary (FKNMS), and the South Florida Water Management District (SFWMD) to facilitate intergovernmental coordination and expedite review of canal restoration projects within the Florida Keys.

4. By July 1, 2021, Monroe County shall identify and evaluate funding sources for the implementation of canal restoration projects and the continual operation and maintenance of canals post restoration.

5. By July 1, 2021, and each year thereafter until 2030, Monroe County shall identify canal restoration projects and implementation plans for each canal project. Monroe County shall provide a list of selected canal restoration projects to the Department of Economic Opportunity by October 1st of each year to be completed during the following work program reporting period.

6. By July 1, 2021, and each year thereafter until 2030, Monroe County shall evaluate its canal restoration needs and state and federal funding opportunities and apply annually to at least one state or federal funding opportunity for canal restoration projects.

7. By July 1, 2021 and each year thereafter until 2030, Monroe County shall annually evaluate and allocate funding for canal restoration implementation. Monroe County shall identify any funding in the annual update to the Capital Improvements Element (CIE) of the Comprehensive Plan.

8. By July 1, 2021, the Department of Commerce shall work with each stakeholder, including but not limited to each local government, EPA, ACOE, DEP, NOAA/FKNMS, SFWMD, to facilitate intergovernmental coordination and review of alternative solutions, including reduced regulatory costs, for canal systems that are susceptible to receiving large inputs of seagrass and other accumulated organic material from near shore waters.

9. By July 1, 2022, and each year thereafter until 2030, Monroe County shall report which canal restoration projects have been initiated and projects that were completed during the reporting period to the Department of Economic Opportunity for submission to the Administration Commission.

10. By July 1, 2022, the Department of Commerce shall work with each stakeholder, including but not limited to each local government, EPA, ACOE, DEP, NOAA/FKNMS, SFWMD, to facilitate the permitting approval of the alternative solutions identified for canal systems with accumulated organic material issues to substantially reduce those inputs to levels that do not

contribute to eutrophication, hypoxia, or other water and sediment quality issues within the canals.

11. By July 1, 2023, Monroe County shall submit a plan to assess the effectiveness of completed canal restoration projects. The plan shall describe the methods, timeframes and potential funding sources to monitor the effectiveness of restoration projects based on water quality and ecological response factors. Monroe County shall consult with the DEP Division of Environmental Assessment and Restoration to develop a cost-effective plan. The Department of Economic Opportunity will coordinate review of the completed plan with the DEP. Monroe County shall account for agency review comments and modify the plan as necessary.

12. Beginning July 1, 2024, and annually thereafter until 2030, Monroe County shall assess the effectiveness of canal restoration in accordance with the plan identified in subparagraph (5)(c)11. The DEP will make monitoring information related to Keys water quality available to Monroe County to inform the assessment.

Rulemaking Authority 380.0552(9), 380.05(22) FS. Law Implemented 380.0552 FS. History–New 6-17-11, Amended 11-26-20.

Appendix J

CHAPTER 28-36
LAND PLANNING – BOUNDARY AND PRINCIPLES FOR GUIDING DEVELOPMENT FOR THE CITY OF KEY WEST

28-36.001 Purpose
28-36.002 Boundary
28-36.003 Principles for Guiding Development
28-36.004 Administration

28-36.001 Purpose.

(1) Pursuant to Section VII, Article II, of the Florida Constitution, and Section 380.05, F.S., it is the purpose of these rules to define the boundary of the City of Key West Area of Critical State Concern and to provide principles for guiding development within the critical area in order to conserve and protect the natural, environmental, historical and economic resources, the scenic beauty, and the public facilities within the Area of Critical State Concern.

(2) The 1979 legislation designating the Florida Keys Area of Critical State Concern contained a special provision, Section 380.0552(3), F.S., that required the removal of the City of Key West upon approval by the State Land Planning Agency of the Land Use Element of the Local Government Comprehensive Plan. This was accomplished on June 26, 1981.

(3) Based on the recommendation of the Keys Resource Planning and Management Committee and the State Land Planning Agency, the Administration Commission determined to again designate the City of Key West as an Area of Critical State Concern. These principles are the basis for the City of Key West to prepare the Comprehensive Plan and Land Development Regulations for the designated Area of Critical State Concern. When the principles are properly implemented by the adoption and enforcement of the Comprehensive Plan and Development Regulations, then the advantages of coordinating development in the Area of Critical State Concern should be achieved.

Rulemaking Authority 380.05(1) FS. Law Implemented 380.05(1) FS. History–New 2-28-84, Formerly 27F-15.01, 27F-15.001.

28-36.002 Boundary.

The area designated as an Area of Critical State Concern encompasses the territorial boundaries of the City of Key West, Florida, including the entire Island of Key West, Monroe County, Florida, and all territories whether natural or filled, separated from the Island of Key West by artificial canals or natural channels or waterways, and all territories that have been filled in, built up and developed and areas not contiguous, adjacent to, or abutting on said Island of Key West and served by bridges or other direct connections therewith including bay bottoms owned by the City of Key West, Florida, also including all that part of Stock Island and bay bottoms lying northerly of United States Highway No. 1 which is now owned by the existing municipality of the City of Key West, Florida, the Florida Keys Junior College, and privately owned property and islands including natural or filled or submerged lands lying contiguous to or separated from Stock Island by artificial canals, natural channels, or waterways, particularly described as follows:

A tract of submerged land in the Bay of Florida in Section 27, Township 67 South, Range 25 East, Stock Island, Monroe County, Florida, being more particularly described as follows:

Commence at the point of intersection of U.S. Highway No. 1 with the center line of "Old Country Club Road;" thence northwesterly along said center line of "Old Country Club Road" a distance of 1400 feet; thence North 60º00" West a distance of 200 feet to the P. O. B.; thence continue North 60º00" West distance of 1548 feet to a point; thence continue North 30º00" East a distance of 1100 feet to a point; thence continue South 60º00" East a distance of 1548 feet to a point; thence continue South 30º00" West a distance of 1100 feet to the P. O. B. containing 39.06 acres, more or less.

A tract of submerged land in Section 27, Township 67 South, Range 25 East, offshore from the northwesterly shoreline of Stock Island in Monroe County, Florida, more particularly described as follows:

Commence at the intersection of the center line of U.S. Highway No. 1 and "Old Country Club Road;" thence northwesterly along the center line of said "Old Country Club Road" for a distance of 1400 feet; thence North 60º West, 200 feet; thence at right angles to the last named course, North 30º East, 1100 feet to the point of beginning of the property herein after described; from said point of beginning, thence at right angles to the last named course North 60º West, 1548 feet; thence North 76º East, 900 feet; thence South 34º East, 1040 feet; thence South 30º West, 160 feet, more or less, back to the point of beginning. Containing 13.05 acres, more or less. Lying and being in Section 27, Township 67 South, Range 25 East, Monroe County, Florida; provided, that no island lying

between Roosevelt Boulevard on the easterly shore of the Island of Key West and Cow Key Channel shall be included in the territorial boundaries of the City of Key West, Florida, nor shall the property commonly known as Key Haven be included in the territorial boundaries of the City of Key West, Florida, nor shall the property known as Wisteria Island and/or any other islands situated and lying west of the Island of Key West be included in the territorial boundaries of the City of Key West, Florida (Sp. Acts, 70-762, Section 1).

Rulemaking Authority 380.05(1) FS. Law Implemented 380.05(1) FS. History–New 2-28-84, Formerly 27F-15.02, 27F-15.002.

28-36.003 Principles for Guiding Development.

(1) Objectives to Be Achieved.

(a) Strengthen local government capabilities for managing land use and development;

(b) Protection of tidal mangroves and associated shoreline and marine resources and wildlife;

(c) Minimize the adverse impacts of development of the quality of water in and around the City of Key West and throughout the Florida Keys;

(d) Protection of scenic resources of the City of Key West and promotion of the management of unique, tropical vegetation;

(e) Protection of the historical heritage of Key West and the Key West Historical Preservation District;

(f) Protection of the value, efficiency, cost-effectiveness and amortized life of existing and proposed major public investments, including:

1. The Florida Keys Aqueduct and water supply facilities,

2. Sewage collection and disposal facilities,

3. Solid waste collection and disposal facilities,

4. Key West Naval Air Station,

5. The maintenance and expansion of transportation facilities, and

6. Other utilities, as appropriate;

(g) Minimize the adverse impacts of proposed public investments on the natural and environmental resources of the City of Key West; and

(h) Protection of the public health, safety, welfare and economy of the City of Key West, and the maintenance of Key West as a unique Florida resource.

(2) Elements Requiring Regulation.

(a) Planning and Administration.

1. The City of Key West shall modify the Comprehensive Plan which guides development within its boundaries to be consistent with these principles. The Comprehensive Plan shall be implemented through development regulations, including zoning ordinances and maps, which are kept current and made available for reasonable public distribution and inspection. Development orders shall be issued only in conformance with the policies and standards of the Comprehensive Plan, development regulations and maps.

2. The City of Key West shall prepare and implement Capital Improvement Plans based on viable funding sources to provide adequate infrastructure for existing and future development.

3. Issuance of development orders shall be coordinated with and contingent upon provisions contained within the Capital Improvement Plan. Development shall not be approved which is inconsistent with or exceeds the services specified in the Plan.

4. Special planning and zoning districts shall be created for:

a. Environmentally sensitive areas including, without limitation, mangrove communities. Such areas shall be zoned with a maximum use density of one dwelling unit per acre. Site alteration in these areas shall be limited to 10% of the total site size. Density credit should be considered by local governments as an incentive for the preservation of environmentally sensitive areas.

b. Noise and hazard zones of the Key West Naval Air Station as delineated by the U.S. Navy Office of the Chief of Naval Operations. Development within such zones should be limited to that compatible with air operations. Implementation of this section should be closely coordinated with the Office of the Chief of Naval Operations. Similar districts should be created around civilian airfields in cooperation with the Florida Department of Transportation and the Federal Aviation Administration. Codes for airfield districts should clearly specify height limits for structures and other appropriate restrictions on development necessary to protect air operations and public health and safety.

5. A community impact statement shall be designed to enable local governmental officials to determine the proposed development's favorable or unfavorable impact on the environment, natural resources, economy and the potential of the project to

meet local or regional housing needs. The statement shall also require information relative to the project's potential impact on public facilities, including without limitation, water, sewer, solid waste disposal and transportation facilities. A community impact assessment statement shall be submitted and approved prior to the issuance of development orders or site plan approval for the following developments:

a. Any development which includes building(s) in excess of 45 feet in height;

b. Any intensive land uses including: residential uses of 10 or more dwelling units per acre or 50 or more total dwelling units; and

c. Intensive business, commercial, or industrial uses.

6. Developments shall be encouraged in the Comprehensive Plan and development regulations to use clustering and other design techniques which would reduce public facilities costs, produce energy savings, and improve the scenic quality of the development. In addition, they shall conform to appropriate setback and open space requirements, stringent landscaping and land use compatibility requirements. Building and siting requirements shall reduce hurricane and fire damage potential and control access to City thoroughfares.

7. An evacuation plan consistent with regional and County plans shall be prepared and adopted which provides an opportunity for residents and visitors to evacuate to a place of safety during a natural disaster.

(b) Site Alteration Regulations.

Site alteration and landscaping regulations shall provide for:

1. A land clearing permit of limited duration issued upon approval of a site plan which includes a natural vegetation map, excepting minimal clearing required for survey.

2. Limitation of the size and species of trees allowed to be removed in clearing, including reasonable exceptions for structure sites and public safety. The ordinance shall provide protection for native tropical vegetation and tree species characteristic of West Indian tropical hardwood hammocks.

3. Revegetation and landscaping of cleared sites after construction.

(c) Waste Control and Water Quality Protection.

1. The City of Key West, in cooperation with the Monroe County Waste Collection and Disposal District, shall establish criteria and regulations for the methods and location of the disposal of all solid waste and waste-water effluents and residuals.

2. Site alteration and subdivision regulations shall provide for:

a. Retention of runoff or discharge of such runoff into adequately sized natural vegetative filtration areas in a manner approximating the natural runoff regime.

b. Permanent drainage systems which make maximum use of natural drainage patterns, vegetative retention and filtration.

c. Maintenance of habitat for wildlife species, prevent the introduction of noxious vegetation, and minimize the alteration of transitional wetlands.

(d) Protection of Public Facilities and Investments.

1. The City of Key West, in cooperation with the Florida Keys Aqueduct Authority, shall amend all applicable plumbing codes to provide for the mandatory installation of water conserving fixtures in all new development and redevelopment.

2. Business, commercial and industrial development shall provide off street parking and limited controlled access points to City thoroughfares.

3. Existing and future waste treatment and disposal sites shall be protected from encroachment by land uses which would endanger their functions or existence.

(e) Historical Resource Protection.

1. A management and enforcement plan and ordinance shall be adopted by the City of Key West providing that designs and uses of development reconstruction within the Key West Historical Preservation District shall be compatible with the existing unique architectural styles and shall protect the historical values of the District.

2. The City of Key West shall maintain an architectural review board established pursuant to Section 266.207(2), F.S. Furthermore, the architectural review board shall receive notice of all applications for development within the City of Key West and participate in hearings as appropriate.

Rulemaking Authority 380.05 FS. Law Implemented 380.05(1) FS. History–New 2-28-84, Formerly 27F-15.03, 27F-15.003.

28-36.004 Administration.

(1) The above guidelines are oriented towards protection of natural and historical resources and public investments of regional and State importance.

(2) The Comprehensive Plan and development regulations developed pursuant to these principles shall be:

(a) Performance oriented to maximize design flexibility.

(b) Administered by the municipal government in the same manner as local comprehensive plans, ordinances, and codes.

Rulemaking Authority 380.05 FS. Law Implemented 380.05(1) FS. History–New 2-28-84, Formerly 27F-15.04, 27F-15.004.

Appendix K

Select Year: 2023 Go

The 2023 Florida Statutes

Title XI	Chapter 163	View Entire Chapter
COUNTY ORGANIZATION AND INTERGOVERNMENTAL RELATIONS	INTERGOVERNMENTAL PROGRAMS	

163.3178 Coastal management.—

(1) The Legislature recognizes there is significant interest in the resources of the coastal zone of the state. Further, the Legislature recognizes that, in the event of a natural disaster, the state may provide financial assistance to local governments for the reconstruction of roads, sewer systems, and other public facilities. Therefore, it is the intent of the Legislature that local government comprehensive plans restrict development activities where such activities would damage or destroy coastal resources, and that such plans protect human life and limit public expenditures in areas that are subject to destruction by natural disaster.

(2) Each coastal management element required by s. 163.3177(6)(g) shall be based on studies, surveys, and data; be consistent with coastal resource plans prepared and adopted pursuant to general or special law; and contain:

(a) A land use and inventory map of existing coastal uses, wildlife habitat, wetland and other vegetative communities, undeveloped areas, areas subject to coastal flooding, public access routes to beach and shore resources, historic preservation areas, and other areas of special concern to local government.

(b) An analysis of the environmental, socioeconomic, and fiscal impact of development and redevelopment proposed in the future land use plan, with required infrastructure to support this development or redevelopment, on the natural and historical resources of the coast and the plans and principles to be used to control development and redevelopment to eliminate or mitigate the adverse impacts on coastal wetlands; living marine resources; barrier islands, including beach and dune systems; unique wildlife habitat; historical and archaeological sites; and other fragile coastal resources.

(c) An analysis of the effects of existing drainage systems and the impact of point source and nonpoint source pollution on estuarine water quality and the plans and principles, including existing state and regional regulatory programs, which shall be used to maintain or upgrade water quality while maintaining sufficient quantities of water flow.

(d) A component which outlines principles for hazard mitigation and protection of human life against the effects of natural disaster, including population evacuation, which take into consideration the capability to safely evacuate the density of coastal population proposed in the future land use plan element in the event of an impending natural disaster. The Division of Emergency Management shall manage the update of the regional hurricane evacuation studies, ensure such studies are done in a consistent manner, and ensure that the methodology used for modeling storm surge is that used by the National Hurricane Center.

(e) A component which outlines principles for protecting existing beach and dune systems from human-induced erosion and for restoring altered beach and dune systems.

(f) A redevelopment component that outlines the principles that must be used to eliminate inappropriate and unsafe development in the coastal areas when opportunities arise. The component must:

1. Include development and redevelopment principles, strategies, and engineering solutions that reduce the flood risk in coastal areas which results from high-tide events, storm surge, flash floods, stormwater runoff, and the related impacts of sea-level rise.

2. Encourage the use of best practices development and redevelopment principles, strategies, and engineering solutions that will result in the removal of coastal real property from flood zone designations established by the Federal Emergency Management Agency.

3. Identify site development techniques and best practices that may reduce losses due to flooding and claims made under flood insurance policies issued in this state.

4. Be consistent with, or more stringent than, the flood-resistant construction requirements in the Florida Building Code and applicable flood plain management regulations set forth in 44 C.F.R. part 60.

5. Require that any construction activities seaward of the coastal construction control lines established pursuant to s. 161.053 be consistent with chapter 161.

6. Encourage local governments to participate in the National Flood Insurance Program Community Rating System administered by the Federal Emergency Management Agency to achieve flood insurance premium discounts for their residents.

(g) A shoreline use component that identifies public access to beach and shoreline areas and addresses the need for water-dependent and water-related facilities, including marinas, along shoreline areas. Such component must include the strategies that will be used to preserve recreational and commercial working waterfronts as defined in s. 342.07.

(h) Designation of coastal high-hazard areas and the criteria for mitigation for a comprehensive plan amendment in a coastal high-hazard area as defined in subsection (8). The coastal high-hazard area is the area below the elevation of the category 1 storm surge line as established by a Sea, Lake, and Overland Surges from Hurricanes (SLOSH) computerized storm surge model. Application of mitigation and the application of development and redevelopment policies, pursuant to s. 380.27(2), and any rules adopted thereunder, shall be at the discretion of local government.

(i) A component which outlines principles for providing that financial assurances are made that required public facilities will be in place to meet the demand imposed by the completed development or redevelopment. Such public facilities will be scheduled for phased completion to coincide with demands generated by the development or redevelopment.

(j) An identification of regulatory and management techniques that the local government plans to adopt or has adopted in order to mitigate the threat to human life and to control proposed development and redevelopment in order to protect the coastal environment and give consideration to cumulative impacts.

(k) A component which includes the comprehensive master plan prepared by each deepwater port listed in s. 311.09(1), which addresses existing port facilities and any proposed expansions, and which adequately addresses the applicable requirements of paragraphs (a)-(k) for areas within the port and proposed expansion areas. Such component shall be submitted to the appropriate local government at least 6 months prior to the due date of the local plan and shall be integrated with, and shall meet all criteria specified in, the coastal management element. “The appropriate local government” means the municipality having the responsibility for the area in which the deepwater port lies, except that where no municipality has responsibility, where a municipality and a county each have responsibility, or where two or more municipalities each have responsibility for the area in which the deepwater port lies, “the appropriate local government” means the county which has responsibility for the area in which the deepwater port lies. Failure by a deepwater port which is not part of a local government to submit its component to the appropriate local government shall not result in a local government being subject to sanctions pursuant to s. 163.3184. However, a deepwater port which is not part of a local government shall be subject to sanctions pursuant to s. 163.3184.

(3) Expansions to port harbors, spoil disposal sites, navigation channels, turning basins, harbor berths, and other related inwater harbor facilities of ports listed in s. 403.021(9); port transportation facilities and projects listed in s. 311.07(3)(b); intermodal transportation facilities identified pursuant to s. 311.09(3); and facilities determined by the state land planning agency and applicable general-purpose local government to be port-related industrial or commercial projects located within 3 miles of or in a port master plan area which rely upon the use of port and intermodal transportation facilities may not be designated as developments of regional impact if such

expansions, projects, or facilities are consistent with comprehensive master plans that are in compliance with this section.

(4) Improvements and maintenance of federal and state highways that have been approved as part of a plan approved pursuant to s. 380.045 or s. 380.05 shall be exempt from the provisions of s. 380.27(2).

(5) The appropriate dispute resolution process provided under s. 186.509 must be used to reconcile inconsistencies between port master plans and local comprehensive plans. In recognition of the state's commitment to deepwater ports, the state comprehensive plan must include goals, objectives, and policies that establish a statewide strategy for enhancement of existing deepwater ports, ensuring that priority is given to water-dependent land uses. As an incentive for promoting plan consistency, port facilities as defined in s. 315.02(6) on lands owned or controlled by a deepwater port as defined in s. 311.09(1), as of the effective date of this act shall not be subject to development-of-regional-impact review provided the port either successfully completes an alternative comprehensive development agreement with a local government pursuant to ss. 163.3220-163.3243 or successfully enters into a development agreement with the state land planning agency and applicable local government pursuant to s. 380.032 or, where the port is a department of a local government, successfully enters into a development agreement with the state land planning agency pursuant to s. 380.032. Port facilities as defined in s. 315.02(6) on lands not owned or controlled by a deepwater port as defined in s. 311.09(1) as of the effective date of this act shall not be subject to development-of-regional-impact review provided the port successfully enters into a development agreement with the state land planning agency and applicable local government pursuant to s. 380.032 or, where the port is a department of a local government, successfully enters into a development agreement with the state land planning agency pursuant to s. 380.032.

(6) Each port listed in s. 311.09(1) and each local government in the coastal area which has spoil disposal responsibilities shall provide for or identify disposal sites for dredged materials in the future land use and port elements of the local comprehensive plan as needed to assure proper long-term management of material dredged from navigation channels, sufficient long-range disposal capacity, environmental sensitivity and compatibility, and reasonable cost and transportation. The disposal site selection criteria shall be developed in consultation with navigation and inlet districts and other appropriate state and federal agencies and the public. For areas owned or controlled by ports listed in s. 311.09(1) and proposed port expansion areas, compliance with the provisions of this subsection shall be achieved through comprehensive master plans prepared by each port and integrated with the appropriate local plan pursuant to paragraph (2)(k).

(7) Each county shall establish a county-based process for identifying and prioritizing coastal properties so they may be acquired as part of the state's land acquisition programs. This process must include the establishment of criteria for prioritizing coastal acquisitions which, in addition to recognizing pristine coastal properties and coastal properties of significant or important environmental sensitivity, recognize hazard mitigation, beach access, beach management, urban recreation, and other policies necessary for effective coastal management.

(8)(a) A proposed comprehensive plan amendment shall be found in compliance with state coastal high-hazard provisions if:

1. The adopted level of service for out-of-county hurricane evacuation is maintained for a category 5 storm event as measured on the Saffir-Simpson scale; or

2. A 12-hour evacuation time to shelter is maintained for a category 5 storm event as measured on the Saffir-Simpson scale and shelter space reasonably expected to accommodate the residents of the development contemplated by a proposed comprehensive plan amendment is available; or

3. Appropriate mitigation is provided that will satisfy subparagraph 1. or subparagraph 2. Appropriate mitigation shall include, without limitation, payment of money, contribution of land, and construction of hurricane shelters and transportation facilities. Required mitigation may not exceed the amount required for a developer to accommodate impacts reasonably attributable to development. A local government and a developer shall enter into a binding agreement to memorialize the mitigation plan.

(b) For those local governments that have not established a level of service for out-of-county hurricane evacuation by following the process in paragraph (a), the level of service shall be no greater than 16 hours for a category 5 storm event as measured on the Saffir-Simpson scale.

(c) This subsection shall become effective immediately and shall apply to all local governments. Local governments shall amend their future land use map and coastal management element to include the new definition of coastal high-hazard area and to depict the coastal high-hazard area on the future land use map.

History.—s. 7, ch. 85-55; s. 8, ch. 86-191; s. 24, ch. 87-224; s. 7, ch. 93-206; s. 899, ch. 95-147; s. 11, ch. 96-320; s. 65, ch. 99-251; s. 2, ch. 2005-157; s. 2, ch. 2006-68; s. 4, ch. 2009-85; s. 44, ch. 2010-102; s. 14, ch. 2011-139; ss. 7, 80, ch. 2012-96; s. 6, ch. 2012-99; s. 1, ch. 2015-69; s. 27, ch. 2020-2; s. 2, ch. 2022-204.

Copyright © 1995-2023 The Florida Legislature • Privacy Statement • Contact Us

Clearance Times Summary

Deliverable 5: Baseline Modeling			Phases	Florida Keys Including Key West		Florida Keys Excluding Key West	
				Mobile Homes in Phase 2 (hours)	Mobile Homes in Phase 1 (hours)	Mobile Homes in Phase 2 (hours)	Mobile Homes in Phase 1 (hours)
Baseline Modeling		Shows baseline - does not include additional prospective allocations	Phase 2	26.0	24.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
Deliverable 6: Prospective Modeling for Future Allocations							
S1	3,550 Allocations	Distribute based on county/municipality population size	Phase 2	27.5	25.5	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S2	3,550 Allocations	Distribute based percentage of vacant lands per county/municipality	Phase 2	28.0	26.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S3	3,550 Allocations	Distribute based on current allocations: (1,970-Monroe, 300-Marathon, 280-Islamorada, 910-Key West, 30-Layton, 60-Key Colony Beach)	Phase 2	28.0	26.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S4	Minimal Allocations (11 allocations/yr)	Distributes Monroe County (5); Marathon (2); Islamorada (2); Key West (2 – affordable only)	Phase 2 (10 Years Growth)	26.5	24.0	15.5	15.5
			Phase 2B (20 Years Growth)	26.5	24.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S5	One Unit/Vacant Lot	Distributes 7,954 units	Phase 2	31.0	28.5	17.0	16.5
			Phase 1	15.5	15.5	15.0	15.0

RESOLUTION NO. 24-12-134

A RESOLUTION OF THE VILLAGE COUNCIL OF ISLAMORADA, VILLAGE OF ISLANDS, FLORIDA, PROVIDING A RECOMMENDATION TO THE MONROE COUNTY BOARD OF COUNTY COMMISSIONERS REGARDING THE NUMBER OF ADDITIONAL RESIDENTIAL BUILDING PERMIT ALLOCATIONS THE VILLAGE WOULD LIKE TO RECEIVE IN POTENTIAL FUTURE ALLOCATIONS; REPEALING RESOLUTION NO. 24-10-122; PROVIDING FOR TRANSMITTAL OF THIS RESOLUTION TO CERTAIN PEOPLE WITH THE COUNTY

WHEREAS, Islamorada, Village of Islands (the "Village") has implemented the Building Permit Allocation System ("BPAS") as codified in Chapter 30, Article IV, Division 11 of the Village's Code of Ordinances (the "Village Code"); and

WHEREAS, in the Fall of 2023, the State Department of Commerce issued their Florida Keys Hurricane Evacuation Modeling Report which provided several scenarios for clearance times in the event of a hurricane; and

WHEREAS, all the jurisdictions in Monroe County, including the Village, decided to let the County lead the effort on future consideration of additional ROGO[1]/BPAS allocations; and

WHEREAS, the Village Planning Department has held a community engagement process to discuss the impacts of receiving additional allocations including infrastructure, the environment and takings claims; and

WHEREAS, based upon, *inter alia*, the community input received and recommendations of Village staff, the Village Council desires to recommend to the Monroe County Board of County Commissioners ("BOCC") that the Village of Islamorada receive 199.25 additional BPAS allocations; and

---

[1] / ROGO refers to Rate of Growth Ordinance, which is a term utilized by other jurisdictions.

WHEREAS, on October 10, 2024, the Village Council passed and adopted Resolution No. 24-10-122; and

WHEREAS, the Village Council believes that the repeal of Resolution No. 24-10-122 is in the best interest of the Village;

WHEREAS, the Village Council desires to repeal Resolution No. 24-10-122 and replace it with this resolution.

NOW THEREFORE, BE IT RESOLVED BY THE VILLAGE COUNCIL OF ISLAMORADA, VILLAGE OF ISLANDS, FLORIDA, AS FOLLOWS:

Section 1. Recitals. The above recitals are true and correct and are incorporated herein by this reference.

Section 2. Recommendation. The Village hereby recommends to the BOCC that the Village receive 199.25 BPAS allocations, should future allocations be made available by the State of Florida.

Section 3. Repeal of Resolution No. 24-10-122. Resolution No. 24-10-122 is hereby repealed in its entirety.

Section 4. Direction to the Clerk. The Village Clerk is directed to furnish copies of this resolution to:

A. Mayor Jim Scholl and all members of the BOCC;
B. County Clerk Kevin Madok; and
C. County Administrator Christine Hurley.

Section 5. Effective Date. This resolution shall become effective immediately upon its adoption.

[REMAINDER OF THIS PAGE INTENTIONALLY LEFT BLANK]

Motion to adopt by Vice Mayor Horton, seconded by Councilwoman Gillis

FINAL VOTE AT ADOPTION

Mayor Sharon Mahoney	No
Vice Mayor Don Horton	Yes
Councilman Joseph B. Pinder, III	Yes
Councilwoman Deb Gillis	Yes
Councilman Steve Friedman	No

PASSED AND ADOPTED THIS 10TH DAY OF DECEMBER 2024.

Sharon Mahoney
SHARON MAHONEY, MAYOR

ATTEST:

MARNE MCGRATH, VILLAGE CLERK

APPROVED AS TO FORM AND LEGALITY
FOR THE USE OF AND RELIANCE BY
ISLAMORADA, VILLAGE OF ISLANDS ONLY:

JOHN QUICK, VILLAGE ATTORNEY

This Resolution was filed in the Office of the Village Clerk of this 10 day of December, 2024.

Sponsored by: Garrett

CITY OF MARATHON, FLORIDA
RESOLUTION 2024-125

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF MARATHON, FLORIDA, IDENTIFYING THE APPROXIMATE NUMBER OF VACANT BUILDABLE RESIDENTIAL PROPERTIES WITHIN THE CITY OF MARATHON; RELATING TO THE STATE DEPARTMENT OF COMMERCE'S 2023 HURRICANE EVACUATION CLEARANCE TIMES SUMMARY AND THE BUILDING PERMIT ALLOCATION SYSTEM (BPAS); REQUIRING THAT THIS RESOLUTION BE PROVIDED TO APPROPRIATE STAFF OF THE MONROE COUNTY BOARD OF COUNTY COMMISSIONERS TO BE INCLUDED AS PART OF THEIR COLLABORATIVE DECISION MAKING PROCESS ON THE SAME SUBJECT; AND DIRECTING STAFF TO TAKE NECESSARY ACTIONS TO PROVIDE THIS RESOLUTION TO THE FLORIDA LEGISLATURE DURING THE 2025 LEGISLATIVE SESSION; PROVIDING FOR SEVERABILITY; AND PROVIDING FOR AN EFFECTIVE DATE.

WHEREAS, the Florida Legislature and the Administration Commission have included the City of Marathon and all other jurisdictions except the City of Key West within the designated Florida Keys Area of Critical State Concern (Section 380.05, 380.0552, Florida Statutes); and

WHEREAS, the Florida Legislature and the Administration Commission have included the City of Key West within the designated Key West Area of Critical State Concern (Rule 28-36, F.A.C.); and

WHEREAS, the Florida Legislature and the Administration Commission have mandated that the City of Marathon, Florida include within the goals, objectives, and policies of its Comprehensive Plan measures to protect public safety and welfare in the event of a hurricane, by maintaining an evacuation clearance time for permanent residents of no more than 24 hours (Section 380.0552 (9) (a) 2., Florida Statutes; Rule 28-18.400 (5) (a) 4. and 5., F.A.C.); and

WHEREAS, the Florida Legislature further mandated that the hurricane evacuation clearance time for Monroe County and other local governments within the Florida Keys Areas of Critical State Concern (ACSC) and the Key West Area of Critical State Concern shall be determined by a state-approved hurricane evacuation study, conducted in accordance with a professionally accepted methodology (Rule 28-18.400 (5) (a), F.A.C. and Rule 28-36, F.A.C.); and

WHEREAS, Hurricane Evacuation Clearance Times are the basis for the Florida Keys Area of Critical State Concern's Building Permit Allocation System (Rate of Growth Ordinance), and updated data may determine whether additional residential units will be authorized by the State of Florida beyond the existing allocation; and

WHEREAS, the Florida Department of Commerce has provided different clearance time and BPAS scenarios, based on its data, input variables, and assumptions as set forth in the

Clearance Times Summary, attached as Exhibit A. The Summary depends on several hurricane evacuation scenarios with future allocations ranging from zero (0) additional units to 7,954 additional units. These include columns where evacuation was modeled both with and without of Key West residents; and with mobile home residents evacuated in both Phase 1 and in Phase 2; and

WHEREAS, in order to accurately depict evacuation clearance times for the population of the Keys ACSCs, City of Key West residents are now included in the model and mobile home residents in Monroe County are modeled as evacuated in Phase 1 (early phase) of the evacuation with the tourists due to the less substantial construction and limited elevation of mobile homes, which the state treats as vehicles; and

WHEREAS, the City of Marathon, Florida acknowledges and accepts the work completed in 2023 in the hurricane evacuation model whose general results are presented in Exhibit A; and

WHEREAS, the City of Marathon supports Monroe County's deliberative approach in not yet accepting the recent 2023 US 1 Arterial Travel Time and Delay Study for travel times from Key West to Key Largo; and

WHEREAS, the City of Marathon has clear "takings" liability as BPAS allocations will have all been distributed during 2025; and

WHEREAS, the City has significant concerns related to "takings" liability in light of recent decisions rendered by the 3rd District Court of Appeals for the State of Florida; and

WHEREAS, the City holds applications for 65 market rate BPAS allocations and 53 affordable BPAS allocations; and

WHEREAS, among the 118 applications for BPAS allocations, 53 have reached a point at which they could potentially request Administrative Relief BPAS allocations of which there are only 12; and

WHEREAS, recent estimates of remaining vacant parcels in Marathon, as provided in Exhibit B, indicate that there are approximately 700 vacant parcels within the City, 560 of which are estimated as buildable; and

WHEREAS, thirteen (13) RH zoned and 42 RM zoned vacant parcels are large enough to allow more than one residence per parcel; and

WHEREAS, the thirteen (13) RH zoned parcels are large enough to allow 70 residential units while the RM zoned parcels would allow up to 149 residential units; and

WHEREAS, based on the analysis above, the City will require 724 allocations; and

WHEREAS, assuming that we will require approximately fifty (50) percent more units for affordable workforce housing, then the City will require approximately 1,086 residential allocations, and

WHEREAS, the City is committed to continuing to work with the County and each of the

other municipalities to develop a positive future scenario for BPAS (ROGO); and

WHEREAS, such scenario should seek a minimum 30 year BPAS (ROGO) horizon and operate within any current and future Level Of Service (LOS) and environmental constraints; and

WHEREAS, the City has also indicated that future allocations should prioritize owner-occupied residences and workforce housing through strongly worded revisions to each of the Keys jurisdictions Comprehensive Plans; and

WHEREAS, the City Council has indicated that we must work on this scenario and a potential Legislative modification this year and during this Legislative Session,

NOW THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF MARATHON, FLORIDA, THAT:

Section 1. The Council urges the Legislature to collectively and collaboratively work with Monroe County and other municipalities this year and during this Legislative Session to develop a Legislative solution to the continuation of BPAS (ROGO) and the cessation of the "takings" dilemma.

Section 2. The City Council requests that language similar to or approximating the following language be utilized to amend Chapter 380.0552 (9):

1. Amend 380.0552 (9)

(9) MODIFICATION TO PLANS AND REGULATIONS.—

(a) Any land development regulation or element of a local comprehensive plan in the Florida Keys Area may be enacted, amended, or rescinded by a local government, but the enactment, amendment, or rescission becomes effective only upon approval by the state land planning agency. The state land planning agency shall review the proposed change to determine if it is in compliance with the principles for guiding development specified in chapter 27F-8, Florida Administrative Code, as amended effective August 23, 1984, and must approve or reject the requested changes within 60 days after receipt. Amendments to local comprehensive plans in the Florida Keys Area must also be reviewed for compliance with the following:

1. Construction schedules and detailed capital financing plans for wastewater management improvements in the annually adopted capital improvements element, and standards for the construction of wastewater treatment and disposal facilities or collection systems that meet or exceed the criteria in s. 403.086(10) for wastewater treatment and disposal facilities or s. 381.0065(4)(l) for onsite sewage treatment and disposal systems.

2. Goals, objectives, and policies to protect public safety and welfare in the event of a natural disaster by maintaining a hurricane evacuation clearance time for permanent residents of no more than ~~24~~ 26 hours. The hurricane evacuation clearance time shall be determined by a hurricane evacuation study conducted in accordance with a professionally accepted methodology and approved by the state land planning agency.

2. Amend by adding 380.0552 (9) (a) 3. / 28-36.004 (3) F.A.C.

3. Predicated upon a maximum hurricane evacuation time of 26 hours, to include all jurisdictions within the Florida Keys and Key West Areas of Critical State Concern:
    a. Residential allocations are hereby provided to these Areas of Critical State Concern based upon an assessment that this number approximates the number of vacant buildable residential lots remaining within the Florida Keys and the understanding that the development of this number of additional residential units will not cause the two Areas of Critical State Concern to exceed the calculated hurricane evacuation time.
    b. Residential allocations provided herein shall be distributed among jurisdictions within the two Areas of Critical State concern based upon the relative number of vacant buildable residential lots within each jurisdiction; to be determined by the jurisdictions.
    c. Within each participating jurisdiction, distribution of residential allocations provided herein shall be accomplished approximately evenly each year and shall occur over a minimum forty-year (40) horizon.
    d. Any individual jurisdiction may borrow residential allocations forward from future years if those allocations will be utilized for affordable / workforce housing development which would be deed restricted as affordable / workforce housing for a minimum period of ninety-nine (99) years.
    e. The distribution of residential allocations by any jurisdiction shall be limited by any adopted Level Of Service (LOS) standard within that jurisdiction which would be compromised by the issuance of additional allocations.
    f. Separate consideration shall be made for transportation LOS which may act across all jurisdictions.
    g. The distribution of residential allocations within each jurisdiction shall adhere to all environmental priorities and limitations in adopted comprehensive plans relative to the distribution of residential allocations through respective Building Permit Allocation Systems or Rate Of Growth Ordinance.
    h. Under this provision, buildable lots shall be considered those whose environmental designation is not characterized exclusively as wetlands (Submerged Lands, Mangroves, Saltmarsh and Buttonwood, Freshwater Wetlands). With the residential allocations provided herein, distribution by each jurisdiction shall be prioritized to buildable lots.
    i. Distribution of residential allocations shall be prioritized to owner occupied residences and affordable / workforce housing project types.
    j. Acquisition of environmentally sensitive workforce and affordable housing, and necessary infrastructure properties remain a priority for state and local land acquisition agencies regardless of the residential allocations which the 26-hour hurricane evacuation time may provide.
    k. Authority is herein granted for local jurisdictions to adopt Ordinances to carry out the intent of this legislation.

Section 3. Directs the City Clerk to transmit a certified copy of this resolution to other Monroe County local government jurisdictions, the Governor, Senate President, House Speaker, and members of the Monroe County State Legislative Delegation.

Section 4. This resolution shall be effective upon adoption.

PASSED AND APPROVED BY THE CITY COUNCIL OF THE CITY OF MARATHON, FLORIDA, THIS 10TH DAY OF DECEMBER 2024.

THE CITY OF MARATHON, FLORIDA

Lynn Landry, Mayor

AYES: Smith, Still, Matlock, DelGaizo, Landry
NOES: None
ABSENT: None
ABSTAIN: None

ATTEST:

Diane Clavier, City Clerk

(City Seal)

APPROVED AS TO FORM AND LEGALITY FOR THE USE AND RELIANCE OF THE CITY OF MARATHON, FLORIDA ONLY:

Steve Williams, City Attorney

EXHIBIT “A”

Clearance Times Summary

Deliverable 5: Baseline Modeling			Phases	Florida Keys Including Key West		Florida Keys Excluding Key West	
				Mobile Homes in Phase 2 (hours)	Mobile Homes in Phase 1 (hours)	Mobile Homes in Phase 2 (hours)	Mobile Homes in Phase 1 (hours)
Baseline Modeling		Shows baseline - does not include additional prospective allocations	Phase 2	26.0	24.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
Deliverable 6: Prospective Modeling for Future Allocations							
S1	3,550 Allocations	Distribute based on county/municipality population size	Phase 2	27.5	25.5	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S2	3,550 Allocations	Distribute based percentage of vacant lands per county/municipality	Phase 2	28.0	26.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S3	3,550 Allocations	Distribute based on current allocations: (1,970-Monroe, 300-Marathon, 280-Islamorada, 910-Key West, 30-Layton, 60-Key Colony Beach)	Phase 2	28.0	26.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S4	Minimal Allocations (11 allocations/yr)	Distributes Monroe County (5); Marathon (2); Islamorada (2); Key West (2 – affordable only)	Phase 2 (10 Years Growth)	26.5	24.0	15.5	15.5
			Phase 2B (20 Years Growth)	26.5	24.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S5	One Unit/Vacant Lot	Distributes 7,954 units	Phase 2	31.0	28.5	17.0	16.5
			Phase 1	15.5	15.5	15.0	15.0

EXHIBIT “B”

CITY OF MARATHON

VACANT PARCELS

Monroe County Property Appraiser Office tax roll October2024 data, PC codes vacant residential (0000).

Removed parcels with known projects, Condo association parcels, access easements, docks, conservation easement parcels, and nonzoned areas, and City of Marathon parcels.

Total Vacant Parcels ~ 700

Total Buildable Vacant Parcels

140 most likely unbuildable due to habitat including 6 red flag wetlands.

(Source: Marathon habitat layer & KEYWEP).

Zoning	All Vacant Parcels total
MU & MU-M	36
PR	1
RL-C	52
R-MH	41
RH	35
RL	31
RM	289
RM-1	17
RM-2	3
I-G & I-M	1
C-NA	65
C-OI	4
Total	**575**
FL Forever list	

LOTS PURCHASED OR DONATED SINCE JULY 2013: 15 parcels as of Jan2023

Credit: City of Marathon Planning Department, Oct 2024

RESOLUTION NO. _____-2024

A RESOLUTION BY THE BOARD OF COUNTY COMMISSIONERS OF MONROE COUNTY ("BOARD") REQUESTING APPROVAL, BY THE STATE OF FLORIDA, OF ADDITIONAL RATE OF GROWTH ORDINANCE BUILDING PERMIT ALLOCATIONS AND BOARD-PROPOSED CHANGES TO SECTION 380.0552 FLORIDA STATUTES TO INCREASE THE STATUTORILY REQUIRED HURRICANE EVACUATION CLEARANCE TIME FOR THE FLORIDA KEYS AREA OF CRITICAL STATE CONCERN FROM 24 HOURS TO XXX HOURS TO ACCOMMODATE THE BUILDING OF ADDITIONAL DEVELOPMENT WITHIN THE FLORIDA KEYS, FOLLOWING ANALYSIS OF PRIVATELY OWNED VACANT PARCELS AND POTENTIAL AFFORDABLE HOUSING DEVELOPMENT PROJECT SITES WITHIN UNINCORPORATED MONROE COUNTY.

WHEREAS, the Florida Keys constitutes an Area of Critical State Concern ("Florida Keys ACSC") in Florida, as established through Rule 28-29.002, Florida Administrative Code, and Sections 380.05 and 380.0552, Florida Statutes; and

WHEREAS, pursuant to Section 380.0552(9)(a)(2.), Florida Statutes, all local comprehensive plans within the Florida Keys ACSC must include goals, objectives, and policies to protect public safety and welfare in the event of a natural disaster by maintaining a hurricane evacuation clearance time for the permanent residents of the Florida Keys of no more than 24 hours, the hurricane evacuation clearance time shall be determined by a hurricane evacuation study conducted in accordance with a professionally accepted methodology and approved by the state land planning agency ("Florida Department of Commerce"), and for purposes of hurricane evacuation clearance time:

a. Mobile home residents are not considered permanent residents.
b. The City of Key West Area of Critical State Concern established by Chapter 28-36, Florida Administrative Code, shall be included in the hurricane evacuation study and is subject to the evacuation requirements of this subsection; and

WHEREAS, in 2023, following the 2020 U.S. Census, the Florida Department of Commerce completed an update to the hurricane evacuation modeling task which included Baseline Modeling and, per the December 2023 Florida Keys Hurricane Evacuation Modeling Report (the "Report"), "**five additional scenarios (S1-S5)…that examined the effect of prospective building allocations, to facilitate discussion…to help inform future policy considerations that may be considered by state and local officials and stakeholders**"; and

WHEREAS, Table 3 from the Report, which summarized Hurricane Evacuation Clearance times for each scenario modeled, is attached hereto as Exhibit A.; and

WHEREAS, the Report's Scenario 4 ("S4") showed that 220 additional residential permit allocations would be the maximum that may be legally awarded without exceeding and violating the statutorily required 24-hour hurricane evacuation clearance timeline, distributed Keys-wide as follows: Unincorporated Monroe County: 100, Marathon: 40, Islamorada: 40, and Key West: 40 affordable; and

WHEREAS, the Report included three (3) scenarios (S1, S2, and S3) that modeled an additional 3,550 permit allocations Keys-wide, distributed by county/municipality population size (S1), percentage of vacant lands per county/municipality (S2), and distributed based on current allocations (S3); and

WHEREAS, Monroe County (the "County") has, through reliable professional staff research and analysis of materially relevant data and information, reduced the assumed number of vacant, privately-owned, buildable parcels within the unincorporated County that pose a possible risk of a takings claim from the initial State-modeled 6,086 parcels to a final figure of approximately 1,618 parcels, in actuality; and

WHEREAS, in addition to privately-owned vacant residential parcels, there are approximately 204 vacant parcels within Unincorporated Monroe County currently zoned for mixed use and multifamily development that hold development potential for approximately 676 affordable housing dwelling units based on current zoning and density standards; and

WHEREAS, Monroe County has begun the necessary steps to establish a new category of housing within the Monroe County Comprehensive Plan and Land Development Code, Workforce Market Rate Housing, which would be regulatorily limited to use and occupancy by those who derive at least 70 percent of their income as members of the Workforce in Monroe County, gainfully employed providing goods and/or services to Monroe County residents or visitors;

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COUNTY COMMISSIONERS OF MONROE COUNTY, FLORIDA:

Section 1. **Recitals.** The above recitals are true and correct and are hereby incorporated as if fully set forth herein.

Section 2. The Board of County Commissioners of Monroe County requests that the state legislature adopt amendments to Section 380.0552(9)(a) to:

(a) increase the required hurricane evacuation clearance time for permanent residents of the Florida Keys ACSC from 24 hours to a greater timeframe of xx hours; and

(b) require that at least ____xx__(1,618 or 1,208 or 799)___ new permit allocations in unincorporated Monroe County shall be reserved for issuance of only 1 allocation per vacant buildable parcel, regardless of maximum development

potential, the majority of which shall be designated as Workforce Market Rate Housing as defined in the Monroe County Comprehensive Plan; and

(c) require that each local jurisdiction shall distribute its allocations evenly over a _____xx____(40-year?)_____ time period.

Section 3. The extended hurricane evacuation timeframe is understood to include 220 permit allocations (100 for Monroe County) as modeled in Scenario 4 of the December 2023 Florida Keys Hurricane Evacuation Modeling Report.

Section 4. This Resolution shall become effective as upon adoption and/or as otherwise provided by law.

PASSED AND ADOPTED by the Board of County Commissioners of Monroe County, Florida, at a regularly scheduled public meeting held on the ___th day of December, 2024.

Mayor James K. Scholl _____
Mayor *Pro Tem* Michelle Lincoln _____
Commissioner Craig Cates _____
Commissioner David Rice _____
Commissioner Holly Merrill Raschein _____

BOARD OF COUNTY COMMISSIONERS OF MONROE COUNTY, FLORIDA

By: _____
Mayor James Scholl

ATTEST: KEVIN MADOK, CLERK

_____
AS DEPUTY CLERK

RESOLUTION NO. 24-320

A RESOLUTION OF THE CITY COMMISSION OF THE CITY OF KEY WEST, FLORIDA, STATING ITS INTENT TO REQUEST THE MAXIMUM AMOUNT OF BUILDING PERMIT ALLOCATIONS (BPAS) FROM THE STATE OF FLORIDA DEPARTMENT OF COMMERCE AND MONROE COUNTY, BASED ON THE 2023 HURRICANE EVACUATION CLEARANCE TIMES; DIRECTING THE CITY MANAGER TO SUBMIT THIS RESOLUTION TO THE LEGISLATIVE DELEGATION FOR THE FLORIDA KEYS TO BE PRESENTED DURING THE 2025 LEGISLATIVE SESSION, THE FLORIDA DEPARTMENT OF COMMERCE, AND THE MONROE COUNTY BOARD OF COUNTY COMMISSIONERS; PROVIDING FOR AN EFFECTIVE DATE

WHEREAS, the Florida Keys and most of its municipalities are part of an Area of Critical State Concern wherein growth is regulated by mechanisms known as the Rate of Growth Ordinance (ROGO) and Building Permit Allocations (BPAS) that are based in large measure on hurricane evacuation times; and

WHEREAS, Monroe County is currently considering a request to the State of Florida's Department of Commerce (DOC) to allocate more ROGO/BPAS based on the latest 2023 hurricane evacuation modeling; and

WHEREAS, while Monroe County and other municipalities in Monroe County has a stated concern for more ROGOs based on potential takings liability, the City of Key West's desire for

more BPAS units is based on its current crisis regarding a shortage of affordable housing inventory; and

WHEREAS, unlike other municipalities in Monroe County, as well as a considerable portion of unincorporated Monroe County, the City of Key West is geographically the furthest away from the larger workforce pool on mainland Florida. This has isolated Key West and the lower Florida Keys from the workforce market and has therefore exacerbated the affordable housing inventory to crisis levels; and,

WHEREAS, the City of Key West Area of Critical State Concern that was created pursuant to Ch. 28-36 of the FL Administrative Code is included in the hurricane evacuation study and is subject to evacuation pursuant to F.S. 380.0552(9)(a)2.b.; and,

WHEREAS, F.S.380.0552(9) requires evacuation of permanent residents within 24 hours in the event of a hurricane, which currently makes 220 ROGO/BPAS allocations available to Monroe County and its 3 main municipalities according to the 2023 hurricane evacuation modeling study, which would conceivably allocate 40 affordable units to Key West; and,

WHEREAS, the City Commission for the City of Key West believes that it has the highest exposure to a need for affordable BPAS units after the passage of the Live Local Act, which among other things, preempts city regulations concerning density and height

regarding the construction of affordable housing; and,

WHEREAS, the City Commission for the City of Key West believes that its anticipated share of the 220 ROGO/BPAS units that were identified in the 2023 study is inadequate to address the City of Key West's affordable housing crisis, which is made more critical by the passage of the Live Local Act; and,

WHEREAS, The Key West Housing Authority, as the principle developer and operator of affordable housing in the City of Key West has the ability to develop approximately 330 additional units of affordable housing at its public housing sites, which is more affordable units than the city currently stands to likely acquire. There are also other potential affordable housing projects by other private developers that would also cause a need for more than the 40 anticipated affordable allocations; and,

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COMMISSION OF THE CITY OF KEY WEST, FLORIDA, AS FOLLOWS:

Section 1:

The City Commission for the City of Key West supports any methodology that would result in the maximum amount of affordable BPAS units being allocated to the City of Key West, including supporting a statutory change to increase hurricane evacuation times from 24 to ~~26~~ 25.5 hours for permanent residents.

Section 2:

The City Commission for the City of Key West supports any county-wide assignment of affordable BPAS allocations based on percentage of population of the county and the relevant municipalities therein.

Section 3: That the City Manager is directed to submit this Resolution to the state legislative delegation for the Florida Keys, the Monroe County Board of County Commissioners, the Monroe County Administrator, and the Secretary of the Florida Department of Commerce.

Section 4: That this Resolution shall go into effect immediately upon its passage and adoption and authentication by the signature of the Presiding Officer and the Clerk of the Commission.

REMAINDER OF PAGE LEFT INTENTIONALLY BLANK

Passed and adopted by the City Commission at a meeting held this 12th day of December, 2024.

Authenticated by the Presiding Officer and Clerk of the Commission on 13th day of December, 2024.

Filed with the Clerk on December 13, 2024.

Mayor Danise Henriquez	Yes
Vice Mayor Lissette Carey	No
Commissioner Aaron Castillo	Yes
Commissioner Monica Haskell	No
Commissioner Mary Lou Hoover	Yes
Commissioner Sam Kaufman	No
Commissioner Donald "Donie" Lee	Yes

DANISE HENRIQUEZ, MAYOR

ATTEST:

KERI O'BRIEN, CITY CLERK

Comparison of Requests by Marathon, Key West, Islamorada
December 19, 2024 Board of County Commissioners Meeting

		Marathon	Key West				Current	40 year annual distribtuion		30 year annual distribtuion		20 year annual distribtuion		10 year annual distribution	
		Recommendation	Recommendation	Islamorada	Monroe County	TOTAL	Allocation	S2	S1	S2	S1	S2	S1	S2	S1
# of Buildable Lots (Potential Takings Liability)		560	84	214	1618	2476									
# buildable lots including large lots using maximum density		724			*										
# of units requested for affordable housing		362			676										
# of Units Requested at a minimum including affordables		1086		199.75	2294	3580									
Evacuation Time		26	25.5	X	X										
Scenario from Commerce report		S2	S1	Did Not Choose	X										
	Unincorporated Monroe	2718	1604	a scanario		Unincorporated Monroe	62	68	40	91	53	136	80	272	160
	Marathon	341	548			Marathon	30	9	14	11	18	17	27	34	55
	Islamorada	433				Islamorada	22	11		14		22		43	
	KCB	17				KCB	N/A	0		1		1		2	
	Layton	4				Layton	N/A	0		0		0		0	
	Key West	37	1398			Key West	N/A	1	35	1	47	2	70	4	140
		3550	**3550**					89	89	118	118	178	178	355	
Method of Distribution		# of vacant buildable lots													
	With	Priority to vacant buildable lots													
	With	Priority to be to owner occupied residences and affordable/workforce projects													
Minimum Distribution Time period		40			40										
	Unless	Borrow forward for affordable/workforce housing													
	Unless	Issuance of allocations would trigger concurency issue within jurisdiction based on the jurisdictions LOS requirements													
Continue to purchase environmentaly sensitive land															

* Takings liability wasn't calculated for large lots with maximum density since only 1 units will satisty liability

Clearance Times Summary

Deliverable 5: Baseline Modeling			Phases	Florida Keys Including Key West		Florida Keys Excluding Key West	
				Mobile Homes in Phase 2 (hours)	Mobile Homes in Phase 1 (hours)	Mobile Homes in Phase 2 (hours)	Mobile Homes in Phase 1 (hours)
Baseline Modeling		Shows baseline - does not include additional prospective allocations	Phase 2	26.0	24.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
Deliverable 6: Prospective Modeling for Future Allocations							
S1	3,550 Allocations	Distribute based on county/municipality population size	Phase 2	27.5	25.5	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S2	3,550 Allocations	Distribute based percentage of vacant lands per county/municipality	Phase 2	28.0	26.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S3	3,550 Allocations	Distribute based on current allocations: (1,970-Monroe, 300-Marathon, 280-Islamorada, 910-Key West, 30-Layton, 60-Key Colony Beach)	Phase 2	28.0	26.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S4	Minimal Allocations (11 allocations/yr)	Distributes Monroe County (5); Marathon (2); Islamorada (2); Key West (2 – affordable only)	Phase 2 (10 Years Growth)	26.5	24.0	15.5	15.5
			Phase 2B (20 Years Growth)	26.5	24.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S5	One Unit/Vacant Lot	Distributes 7,954 units	Phase 2	31.0	28.5	17.0	16.5
			Phase 1	15.5	15.5	15.0	15.0

COUNTY of MONROE
The Florida Keys

BOARD OF COUNTY COMMISSIONERS
Mayor James K. Scholl, District 3
Mayor Pro Tem Michelle Lincoln, District 2
Craig Cates, District 1
David Rice, District 4
Holly Merrill Raschein, District 5

Special Board of County Commissioners Meeting Meeting
December 19, 2024
Agenda Item Number: B3
2023-3463

BULK ITEM: No

DEPARTMENT: Planning & Environmental Resources

TIME APPROXIMATE:

STAFF CONTACT: Emily Schemper

AGENDA ITEM WORDING:

Consideration of a Resolution By The Board Of County Commissioners Of Monroe County ("Board") Requesting Approval, By The State Of Florida, Of Additional Rate Of Growth Ordinance Building Permit Allocations And Board-Proposed Changes To Section 380.0552 Florida Statutes To Increase The Statutorily Required Hurricane Evacuation Clearance Time For The Florida Keys Area Of Critical State Concern From 24 Hours To 24.5 Hours To Accommodate The Building Of 500 Units Of Additional Residential Development Within The Florida Keys And Key West Areas Of Critical State Concern, Following The Monroe County Planning And Environmental Resources Department's Analysis Of Privately Owned Vacant Parcels And Potential Affordable Housing Development Project Sites.

ITEM BACKGROUND:

In 2023, following the 2020 U.S. Census, the State of Florida Department of Commerce ("FL Commerce") completed an update to the State's hurricane evacuation modeling which included Baseline Modeling and, per the December 2023 Florida Keys Hurricane Evacuation Modeling Report (the Report), "five (5) additional scenarios (S1-S5) that examine the effect of prospective building allocations, to facilitate discussion…to help inform future policy considerations that may be considered by state and local officials and stakeholders." Scenario 4 of the modeling indicated that an additional 220 residential permit allocations Keys-wide was the maximum that could be legally awarded without exceeding and violating the statutorily required (Section 380.0552, Florida Statutes) 24-hour hurricane evacuation timeline for the permanent residents of the Florida Keys, distributed Keys-wide as follows - Unincorporated Monroe County: 100, Marathon: 40, Islamorada: 40, and Key West: 40 affordable. Monroe County officially requested the 220 units through Commerce and Commerce has directed the County complete a comprehensive plan amendment to request 100 of the 220 units. The BOCC gave direction to staff to process a comprehensive plan amendment on December 11, 2024.

During a meeting with Commerce, as well as during discussions with the Office of the Governor, state officials indicated a desire for Monroe County to focus on providing workforce housing.

Over the past year, Monroe County's staff were directed to pursue data collection and analysis,

stakeholder input, community education and outreach, and public discussions regarding environmental concerns, infrastructure capacity/concurrency, possible takings liability, and public safety concerns regarding hurricanes and safe/timely hurricane evacuation. This process was intended to provide the Board of County Commissioners with the necessary information to make a decision/recommendation on the future of ROGO and whether the BOCC should itself request a change, through legislation, to the statutorily required 24-hour hurricane evacuation time-frame in order to make it legal to build additional residential development.

Following a December 17, 2024, meeting with the State and administrative, planning, and legal professional staff from all local government jurisdictions within the Florida Keys and Key West Areas of Critical State Concern, a consensus was reached to propose to each local government board that 500 additional residential permit allocations countywide, 220 of which would be distributed to the subject local government jurisdictions based on Scenario 4 of the State modeling and 280 of which would be distributed to the subject local government jurisdictions based on proportion of vacant, privately-owned, buildable parcels, be requested from the State through a legislative (statutory) change to 380.0552 to increase the required evacuation timeframe from 24 hours to 24.5 hours. The attached draft resolution reflects the request for 500 additional units with the terms as discussed.

PREVIOUS RELEVANT BOCC ACTION:
On November 20, 2024, the BOCC directed staff to proceed with Comprehensive Plan and Land Development Code amendments to request/accept the County's portion (100 units) of the 220 additional ROGO units that would be the maximum that could be awarded without exceeding general law's 24-hour required evacuation timeline, per Scenario 2 of the December 2023 Florida Keys Hurricane Evacuation Modeling Report.

INSURANCE REQUIRED:
No

CONTRACT/AGREEMENT CHANGES:
N/A

STAFF RECOMMENDATION:

Based on the meeting held with the County's legislative delegation and staff from all of the local government jurisdictions on December 17, 2024, staff developed this resolution to reflect the policy preference of Representative Mooney and Senator Rodriguez. If the Board wishes to pursue any additional units during the 2025 legislative session, staff recommends approval.

DOCUMENTATION:

Exhibit A to Resolution - Clearance Times Summary Table
Draft_Resolution_Requesting_500_ROGO_Allocations (Final - Stamped-and-Signed).pdf

---

FINANCIAL IMPACT:
N/A

Clearance Times Summary

Deliverable 5: Baseline Modeling			Phases	Florida Keys Including Key West		Florida Keys Excluding Key West	
				Mobile Homes in Phase 2 (hours)	Mobile Homes in Phase 1 (hours)	Mobile Homes in Phase 2 (hours)	Mobile Homes in Phase 1 (hours)
Baseline Modeling		Shows baseline - does not include additional prospective allocations	Phase 2	26.0	24.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
Deliverable 6: Prospective Modeling for Future Allocations							
S1	3,550 Allocations	Distribute based on county/municipality population size	Phase 2	27.5	25.5	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S2	3,550 Allocations	Distribute based percentage of vacant lands per county/municipality	Phase 2	28.0	26.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S3	3,550 Allocations	Distribute based on current allocations: (1,970-Monroe, 300-Marathon, 280-Islamorada, 910-Key West, 30-Layton, 60-Key Colony Beach)	Phase 2	28.0	26.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S4	Minimal Allocations (11 allocations/yr)	Distributes Monroe County (5); Marathon (2); Islamorada (2); Key West (2 – affordable only)	Phase 2 (10 Years Growth)	26.5	24.0	15.5	15.5
			Phase 2B (20 Years Growth)	26.5	24.0	15.5	15.5
			Phase 1	15.5	15.5	15.0	15.0
S5	One Unit/Vacant Lot	Distributes 7,954 units	Phase 2	31.0	28.5	17.0	16.5
			Phase 1	15.5	15.5	15.0	15.0

RESOLUTION NO. _____-2024

A RESOLUTION BY THE BOARD OF COUNTY COMMISSIONERS OF MONROE COUNTY ("BOARD") REQUESTING APPROVAL, BY THE STATE OF FLORIDA ("STATE"), OF ADDITIONAL RATE OF GROWTH ORDINANCE ("ROGO") BUILDING PERMIT ALLOCATIONS AND BOARD-PROPOSED CHANGES TO SECTION 380.0552 FLORIDA STATUTES TO INCREASE THE STATUTORILY REQUIRED HURRICANE EVACUATION CLEARANCE TIME FOR THE FLORIDA KEYS AND KEY WEST AREAS OF CRITICAL STATE CONCERN UNDER THE FLORIDA KEYS AREA PROTECTION ACT FROM 24 HOURS TO 24.5 HOURS TO ACCOMMODATE THE BUILDING OF 500 UNITS OF ADDITIONAL RESIDENTIAL DEVELOPMENT WITHIN THE FLORIDA KEYS AND KEY WEST AREAS OF CRITICAL STATE CONCERN, FOLLOWING THE MONROE COUNTY PLANNING AND ENVIRONMENTAL RESOURCES DEPARTMENT'S PROFESSIONAL ANALYSIS OF PRIVATELY OWNED VACANT PARCELS AND POTENTIAL AFFORDABLE HOUSING DEVELOPMENT PROJECT SITES.

WHEREAS, the Florida Keys constitutes an Area of Critical State Concern ("Florida Keys ACSC") in Florida, as established through Rule 28-29.002, Florida Administrative Code, and Sections 380.05 and 380.0552, Florida Statutes; and

WHEREAS, pursuant to Section 380.0552(9)(a)(2.), Florida Statutes, all local comprehensive plans within the Florida Keys ACSC must include goals, objectives, and policies to protect public safety and welfare in the event of a natural disaster by maintaining a hurricane evacuation clearance time for the permanent residents of the Florida Keys of no more than 24 hours, the hurricane evacuation clearance time shall be determined by a hurricane evacuation study conducted in accordance with a professionally accepted methodology and approved by the state land planning agency ("Florida Department of Commerce"), and for purposes of hurricane evacuation clearance time:

a. Mobile home residents are not considered permanent residents.
b. The City of Key West Area of Critical State Concern established by Chapter 28-36, Florida Administrative Code, shall be included in the hurricane evacuation study and is subject to the evacuation requirements of this subsection; and

WHEREAS, in 2023, following the 2020 U.S. Census, the Florida Department of Commerce completed an update to the hurricane evacuation modeling task which included Baseline Modeling

and, per the December 2023 Florida Keys Hurricane Evacuation Modeling Report (the "Report"), "**five additional scenarios (S1-S5)…that examined the effect of prospective building allocations, to facilitate discussion…to help inform future policy considerations that may be considered by state and local officials and stakeholders**"; and

WHEREAS, Table 3 from the Report, which summarized Hurricane Evacuation Clearance times for each scenario modeled, is attached hereto and incorporated herein as Exhibit A.; and

WHEREAS, the Report's Scenario 4 ("S4") showed that 220 additional residential permit allocations would be the maximum that may be legally awarded without exceeding and violating the statutorily required 24-hour hurricane evacuation clearance timeline, distributed Keys-wide as follows: Unincorporated Monroe County: 100, City of Marathon: 40, Village of Islamorada: 40, and City of Key West: 40 affordable; and

WHEREAS, Monroe County (the "County") has officially reduced the number of vacant, privately-owned, buildable parcels within the unincorporated County that pose a possible risk of an takings claim from the initial State-modeled 6,086 parcels to a final figure of approximately 1,618 parcels; and

WHEREAS, the City of Marathon has officially reduced the number of vacant, privately-owned, buildable parcels within the City of Marathon that pose a possible risk of a takings claim from the initial State-modeled 764 parcels to a final figure of approximately 560 parcels, as stated and memorialized in City of Marathon, Florida, Resolution No. 2024-125; and

WHEREAS, the Village of Islamorada has officially reduced the number of vacant, privately-owned, buildable parcels within the Village of Islamorada that pose a possible risk of a takings claim from the initial State-modeled 971 parcels to a final figure of approximately 214 parcels; and

WHEREAS, Monroe County has begun the necessary steps to establish a new category of housing within the Monroe County Comprehensive Plan and Land Development Code, Workforce Market Rate Housing, which would be regulatorily limited to use and occupancy by those who derive at least 70 percent of their income as members of the Workforce in Monroe County, gainfully employed providing goods and/or services to Monroe County residents or visitors; and

WHEREAS, following a December 17, 2024, meeting with the State and administrative, planning, and legal professional staff from all local government jurisdictions within the Florida Keys and Key West Areas of Critical State Concern, a consensus was reached to propose to each local government that 500 additional residential permit allocations countywide, 220 of which would be distributed to the subject local government jurisdictions based on Scenario 4 of the State modeling and 280 of which would be distributed to the subject local government jurisdictions based on proportion of vacant, privately-owned, buildable parcels, be requested from the State through a legislative (statutory) change to Section 380.0552, Florida Statutes, to increase the required and mandatory hurricane evacuation timeframe from 24 hours to 24.5 hours;

NOW, THEREFORE, BE IT RESOLVED BY THE BOARD OF COUNTY COMMISSIONERS OF MONROE COUNTY, FLORIDA:

Section 1. **Recitals.** The above recitals, findings of fact, and conclusions of law are true and correct and are hereby incorporated as if fully set forth herein.

Section 2. The Board of County Commissioners of Monroe County, Florida, requests that the state legislature adopt amendments to Section 380.0552(9)(a)(2.) to:

(a) Increase the required hurricane evacuation clearance time for permanent residents of the Florida Keys ACSC from 24 hours to 24.5 hours; and

(b) Allow a maximum of 500 new residential permit allocations in the Florida Keys and Key West Areas of Critical State Concern, 220 of which can be issued within the existing 24 hour time frame and shall be distributed as shown in the table below according to Scenario 4 of the December 2023 Florida Keys Hurricane Evacuation Modeling Report; and 280 of which would be beyond the 24 hour timeframe and shall be distributed between Monroe County, Islamorada, Marathon, and Key West, as shown in the table below based on the current proportion of vacant buildable parcels within each jurisdiction:

Government	220	Vacant Private Lot inventories	Percentage of total	280	TOTAL 500
Monroe	100	1618	65.3%	183	283
Marathon	40	560	22.6%	63	103
Islamorada	40	214	8.6%	24	64
Key West	40 affordable	84	3.4%	10 affordable	50
	220	2476	100%	280	500

; and

(c) The 500 new residential permit allocations as referenced above shall be reserved for issuance of only 1 allocation per vacant buildable parcel, regardless of maximum development potential; and

(d) Within each local government jurisdiction, a minimum of 70% of the respective jurisdictions above-referenced share of the 500 new residential permit allocations shall be designated as Workforce Market Rate Housing whereby the units are deed restricted for 99 years for occupancy by the workforce defined as county residents who are gainfully employed supplying goods and/or services to county residents or visitors to the county and derive at least 70% of their income from such gainful employment within Monroe County.

Section 3. The extended hurricane evacuation timeframe is understood and acknowledged to include 220 permit allocations as modeled in Scenario 4 of the December 2023 Florida Keys Hurricane Evacuation Modeling Report.

Section 4. This Resolution shall become effective upon adoption and/or as otherwise provided by law.

PASSED AND ADOPTED by the Board of County Commissioners of Monroe County, Florida, at a regularly scheduled special public meeting held on the 19th day of December, 2024.

Mayor James K. Scholl	_____
Mayor *Pro Tem* Michelle Lincoln	_____
Commissioner Craig Cates	_____
Commissioner David Rice	_____
Commissioner Holly Merrill Raschein	_____

BOARD OF COUNTY COMMISSIONERS OF MONROE COUNTY, FLORIDA

By: _____
Mayor James Scholl

ATTEST: KEVIN MADOK, CLERK

_____
AS DEPUTY CLERK

MONROE COUNTY ATTORNEY
APPROVED AS TO FORM

PETER MORRIS
ASSISTANT COUNTY ATTORNEY
Date: 12/18/2024

COUNTY of MONROE
The Florida Keys

BOARD OF COUNTY COMMISSIONERS
Mayor James K. Scholl, District 3
Mayor Pro Tem Michelle Lincoln, District 2
Craig Cates, District 1
David Rice, District 4
Holly Merrill Raschein, District 5

Special Board of County Commissioners Meeting Meeting
December 19, 2024
Agenda Item Number: B4
2023-3439

BULK ITEM: No **DEPARTMENT:** Administration

TIME APPROXIMATE: **STAFF CONTACT:**

AGENDA ITEM WORDING: Public Comment

ITEM BACKGROUND:

PREVIOUS RELEVANT BOCC ACTION:

INSURANCE REQUIRED:
No

CONTRACT/AGREEMENT CHANGES:

STAFF RECOMMENDATION:

DOCUMENTATION:

FINANCIAL IMPACT: