

June 12, 2018

Ms. Helen Gibson  
*CRA Administrator*

The Community Redevelopment Agency (CRA) of City of Pensacola  
222 W. Main St., Third Floor  
Pensacola, Florida 32502

**RE: Proposed CRA Urban Design Overlay**

Ms. Gibson,

I appreciate you meeting with me on May 21<sup>st</sup> to discuss the proposed CRA overlay, as well as notifying me of the posting of the revised draft overlay on May 31<sup>st</sup>. As you know, my brother and I have partnered to create the Galveztown development on the former YMCA site at the NE corner of Palafox Street and Belmont Street. We are excited about bringing a mix of commercial and residential uses to this site.

As discussed with you previously, I had pre-development meetings with Brandi Deese and other city staff on August 3, 2016 and again, along with my civil engineer, on October 26, 2016 to confirm our plans for the parcel were allowed under the City of Pensacola's land development code. Once confirmed, we moved forward and closed on the property on January 4, 2017. Since then, an asbestos remediation was performed on the building, followed by its demolition. Subsequently, most of the site was capped with two feet of clean fill, as required by the state of Florida. The completed work was formally approved last month and the driveways and parking area are being completed this week. The new residential lots have been surveyed and underground utilities have been placed, at our expense, to accommodate the new single family homes on these lots. Design is almost complete for the total renovation and adaptive reuse of an existing commercial building on the site, as well as the design of a single family home we intend to build. We have several buyers for the lots who have been working on home designs and should be ready to close within the next 60 days. With the assistance of Dalrymple Sallis Architecture, we have created a set of design guidelines and planned a new development which will be a great addition to our downtown. As you know, the addition of residential units, and getting "eyes on the street" is critical to creating a more walkable environment. To my knowledge, our nine single family homes are the only residential units downtown which will be located on Palafox until you travel South of Garden Street.

In addition, we have incorporated the following into our design:

- 1.) Rear entry garages
- 2.) Conversion of the site to underground utilities at our expense
- 3.) Collaboration with the Downtown Improvement Board to help implement a road diet on Palafox and other recommendations from their parking study

The design of our development has been publicly praised by the North Hill Neighborhood Association and Mr. Christian Wagley, who is part of the DPZ team. Unfortunately, the proposed overlay regulations on window proportions and size, and requirements for tree placement could force us and our lot buyers to redesign these homes. According to DPZ, anyone who has been issued a development order or a building permit is exempt from these overlay requirements, however those of us who are developing in accordance with the existing subdivision plat have been completely overlooked. As described earlier, we met with the City in advance of purchasing the YMCA property to determine the proposed use was acceptable, have made very significant expenditures towards improvements and design since then, and are now suddenly being told all of the requirements will change within a few months. These sudden changes are a hardship.

As you know, I have requested that property owners who have already attended pre-development meetings with the City and have developments in process be exempted from the new requirements of the overlay. I have also offered solutions as to how the City's planning department could accomplish this, such as writing a letter explaining that development of a particular property was underway at the time the overlay was passed and as a result, it is exempt from the new overlay requirements. The latest draft of the overlay does not address this problem. As a result, I am writing you to formally request the inclusion of this provision in the overlay once again.

The resolutions which formed our CRA, continually refer to the CRA's purpose as "fostering the development and redevelopment" of the CRA area. The CRA's 2010 Urban Core Plan specifically mentions the need to "support private investment in new real estate development". It goes on to state "The CRA may assist private property owners and developers in redeveloping properties in a number of ways including recruiting businesses and/or developers to do business within the CRA urban core and connecting would-be developers with potential property owners to facilitate redevelopment."

DPZ, the CRA's consultant, has stated, "Research proves that communities which adopt urban design standards outperform those who do not" and "Research shows that design standards do not curtail development." I found no research offered by DPZ to support these claims. If you compare the City of Pensacola's CRA areas to planned communities such as Seaside and Alys Beach, I have no doubt these communities do outperform us, however this cannot be held up as proof that imposing strict design standards increases property values and does not discourage new development. Regardless of the methodology, no study has been done on the effects of implementing the particular set of draft design requirements being considered, so to generally say "design standards do not curtail development" is misleading at best.

The reality is, if an individual wants to design and build a modern home in Pensacola and the CRA prohibits modern design elements, that individual will simply build elsewhere. If builders and developers cannot depend on City staff to tell them what can be built on a property without the rules suddenly changing, they will either pay less for properties within the CRA in order to offset the risk involved or build elsewhere in a place where they are confident they will be treated with some basic level of decency. These scenarios clearly do not help foster development or redevelopment within the CRA. In fact, they do exactly the opposite.

I appreciate your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred Gunther". The signature is fluid and cursive, with a large initial "F" and "G".

Fred Gunther  
Galveztown, LLC

cc: Brandi Deese, Assistant Planning Services Administrator  
City of Pensacola Planning Board



COMMUNITY REDEVELOPMENT AGENCY

July 18, 2018

Gunther Properties, LLC.  
Galveztown, LLC.  
Attn: Fred Gunther  
503 East Government Street  
Pensacola, FL 32502

**Re: PROPOSED CRA URBAN DESIGN OVERLAY DISTRICT**

Dear Mr. Gunther:

Thank you for providing comments in reference to the proposed CRA Urban Design Overlay District. You have submitted meaningful feedback to us throughout the course of the proposed overlay district's development, which been addressed and incorporated into the final recommended document to the extent practicable. Please find below a summary of the items of concern presented to us and their corresponding response(s):

**1) Setbacks and lot occupation within the Dense Business Area.**

*Property located within the Dense Business Area will adhere to the existing front setback and lot coverage requirements, as defined in the Land Development Code (LDC) for the Dense Business Area.*

**2) Front yard tree planting requirements.**

*The provision contained within the draft overlay which required that trees planted on private property be setback at least three (3) feet from the right-of-way has been removed. The language has been modified to allow required trees to be planted elsewhere on the block (including within rear, and/or side yards, the right-of-way or clustered on adjoining lots) for lots with a front setback of less than eight (8) feet, where planting in the front yard is not possible.*

**3) Maximum entry grade – 48”.**

*Maximum entry grade heights have been removed for all façade types except common entry.*

**4) Request that pre-development meetings be considered for grandfathering.**

*Grandfathering must be limited to circumstances where a formal approval related to site development has been granted. The authorization must establish a set time period for development, and be based on a final set of plans. Since a final set of plans are typically unavailable, and therefore not considered during a pre-development or development review meeting, and no*

*approval is granted or set time period established, these meetings cannot be considered for grandfathering.*

**5) Permissibility of flat roofs.**

*Flat roofs are permitted for all building types.*

**6) Minimum height standards for substantial modifications to existing buildings.**

*A provision has been added to the overlay exempting the adaptive re-use of buildings from compliance with minimum height standards.*

**7) Standard yard type within the C-2A zoning district.**

*The form standards tables have been clarified to permit a standard yard type for single family detached and two-family (duplex) units within the C-2A zoning district. In the Dense Business Area, front setbacks are limited to a maximum of 10 feet under the existing regulations. The Galveztown development would adhere to this rule as it is located within the Dense Business Area.*

**8) Muntin requirements for windows.**

*The muntin requirement for windows has been changed from a “shall” to a “should” statement.*

**9) Building width limitations for 30’ lot due to 20’ parking setback requirement.**

*Parking requirements have been modified to allow driveways within a maximum of two feet from the property line to allow for wider homes on 30’ lots. Options for wider homes on 30’ lots also include on-street parking, where permitted, and rear access, where feasible.*

**10) Horizontal windows and restriction of modern building types.**

*The overlay seeks to retain key characteristics which exist within the CRA neighborhoods to ensure that new development and redevelopment blends into the authenticity of the surrounding community and is conducive to a walkable, urban environment. The proposed overlay does not prohibit modern design, however, it does require that modern designs respect the context of the surrounding neighborhoods. Our consultant, DPZ, has recommended, however, that the original language be modified to allow square windows, transoms and special windows. Vertical windows placed side by side would also be permissible. These requirements would be limited to frontages only. Interior, non-street fronting sides would not be required to adhere to window proportionality requirements.*

**11) Consideration of existing subdivision plats for grandfathering.**

*Plat approvals authorize the subdivision of land and supporting infrastructure, they do not constitute a design approval for site development or an authorization to build.*

*Grandfathering must be limited to circumstances where a formal approval related to site development has been granted. Authorization must be limited to a set period of time, and based on*



*a final set of plans. Therefore, grandfathering is limited to the issuance of a building permit or development order.*

**12) DPZ assertions that “research proves that communities which adopt urban design standards outperform those who do not” and “research shows that design standards do not curtail development.”**

*DPZ is a nationally acclaimed urban planning and design firm who has developed successful form-based codes and design standards for municipalities all over the world. The firm was selected based on their credentials and qualifications in the field of urban and architectural planning and design. Although providing research citations was not a component of their scope of work, a recent local presentation provided by Ed McMahon with the Urban Land Institute cited a variety of sources which define the value in adopting form-based urban design standards. Some of these sources include:*

- *A study conducted in 2016 by the George Washington University School of Business titled, Foot Traffic Ahead; Ranking Walkable Urbanism in America’s Largest Metros which established that “a majority of new real estate development is occurring in walkable urban neighborhoods.” ;*
- *A study by the Urban Land Institute titled, Value by Design which indicated that landscaping “increases financial return from 5 to 15 percent, increases the rate of project absorption, increases employee productivity, moral and job satisfaction and helps developers win support for proposals.”; and*
- *The book, Building Greener Neighborhoods: Trees as Part of the Plan by the National Association of Home Builders (NAHB) which indicated that: “Studies show that developed lots with trees sell for an average of 20-30 percent more than similarly sized lots without trees.”*

*Additionally, the City’s special review districts have been in effect for many years and have proven to yield positive results without curtailing development. In fact, many of these districts are far more prescriptive than the proposed overlay and all are subject to a review board. The proposed overlay is less prescriptive than the special review districts and will be administratively reviewed, lending itself to greater predictability.*

**13) “If builders and developers cannot depend on City staff to tell them what can be built on a property without the rules suddenly changing, they will either pay less for properties within the CRA in order to offset the risk involved or build elsewhere in a place where they are confident they will be treated with some basic level of decency. These scenarios clearly do not help foster development or redevelopment within the CRA. In fact, they do exactly the opposite.”**

*Public outreach has extended over a period of more than six (6) months, and included an extensive amount of public engagement, including more than sixteen (16) public input sessions, workshops, meetings and/or presentations. Developers/builders with current projects underway may either track the progression of the overlay and design to its specifications or submit their projects for permitting prior to the anticipated effective date. Based on the Planning Board’s recommendation and the current review schedule, the overlay is anticipated to take effect on the fifth business day after adoption or September 20, 2018, pending adoption.*

*The success of Pensacola's special review districts, and new codes and design standards adopted all over the world demonstrate that development is not curtailed by the implementation of these planning methods. Instead, communities are enhanced by the protection and predictability they provide, and their contributions to quality of place.*

We look forward to continued coordination as the overlay progresses. Should you require any further information, please do not hesitate to contact me at (850) 436-5650 or [hgibson@cityofpensacola.com](mailto:hgibson@cityofpensacola.com).

Sincerely,



**M. Helen Gibson**  
CRA Administrator

Cc: file  
Victoria D'Angelo, Asst. CRA Administrator

Enclosures: None.



**Home Builders Association of West Florida**

4400 Bayou Boulevard, Suite 45 • Pensacola, FL 32503-2692 • (850) 476-0318 • Fax (850) 494-9764

June 7, 2018

Ms. Helen Gibson  
*CRA Administrator*  
The Community Redevelopment Agency (CRA) of City of Pensacola  
222 W. Main St., Third Floor  
Pensacola, Florida 32502

**RE: Proposed CRA Urban Design Overlay**

Dear Ms. Gibson:

I appreciate your efforts to revitalize the City of Pensacola's CRA areas. While there are truly positive changes in the proposal, there are some areas of concern that the Home Builders Association's Governmental Affairs Committee would like to address. Please pardon the lateness of this letter but it could not be avoided with the various changes to the document over the past few weeks. We want to make sure that the proposed CRA Urban Design Overlay is not a compilation of unnecessary, costly regulations of home and building design than it is a benefit.

A few examples:

1. Page 28, Illustration 12-2-25.9 demonstrates that parking on one's lot will not be allowed unless it is at least 20' behind the principal building façade. For a 30' wide lot, this means the width of the home would need to be reduced from 20' to 15' to have any parking on site. The overlay proposes alleviating this problem by encouraging shared driveways. A driveway crossing a property line is considered an encroachment, which can prevent a lender from financing the purchase of a property.
2. Section 12-2-25(G)(j) requires:
  - a.) Windows shall be vertical in proportion.
  - b.) Single panes of glass shall not exceed 20 square feet for residential building types.
3. It has been stated in previous meetings that anyone who has been issued a development order or a building permit is exempt from these requirements, however this intentionally ignores properties which are being developed in accordance with their existing plat. Several of our members met with the City in advance of purchasing their properties to determine their proposed use is acceptable. Developers/builders have made very significant expenditures towards improvements and design since then and are now suddenly being told the requirements will change within a few months. The HBA request that the developers/builders who have been through the process be grandfathered in to avoid additional time and expense.



Resolution 54-80, which formed the City's CRA, states the purpose of the CRA is the elimination of blight and "rehabilitation, conservation and redevelopment" of the CRA area. Subsequent resolution 55-80 directs the CRA to "Work with private investors, other government agencies, its agents and consultants, employees and community groups and interests to foster the development and redevelopment" of the CRA area. The HBA encourages the CRA to address these issues and work to make meaningful changes to the proposed CRA document. This will be helpful in fostering development or redevelopment.

I appreciate your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "David Peaden". The signature is fluid and cursive, with a large initial "D" and "P".

David Peaden  
Executive Director



COMMUNITY REDEVELOPMENT AGENCY

July 18, 2018

Home Builders Association  
of West Florida  
Attn: David Peaden  
4400 Bayou Blvd., Suite 45  
Pensacola, FL 32503

**Re: PROPOSED CRA URBAN DESIGN OVERLAY DISTRICT**

Dear Mr. Peaden:

Thank you for providing comments in reference to the proposed CRA Urban Design Overlay District. You have submitted meaningful feedback to us which has been addressed and incorporated into the final recommended document to the extent practicable. Please find below a summary of the items of concern presented to us and their corresponding response(s):

- 1) **Page 28, Illustration 12-2-25.9 demonstrates that parking on one's lot will not be allowed unless it is at least 20' behind the principal building façade. For a 30' wide lot, this means the width of the home would need to be reduced from 20' to 15' to have any parking on site. The overlay proposes alleviating this problem by encouraging shared driveways. A driveway crossing a property line is considered an encroachment, which can prevent a lender from financing the purchase of a property.**

*Uncovered driveway parking is permitted in front of the building façade. To allow for wider homes on 30' lots, parking requirements have been modified to allow driveways within a maximum of two feet from the property line. Options for wider homes on 30' lots also include on-street parking, where permitted, and rear access, where feasible.*

- 2) **Section 12-2-25(G)(j) requires: a.) Windows shall be vertical in proportion. b.) Single panes of glass shall not exceed 20 square feet for residential building types.**

*Window requirements were established to preserve the unique character of the CRA neighborhoods, and to encourage contextual development which is conducive to a walkable, urban environment. Our consultant, DPZ, has recommended, however, that the original window verticality language be modified to allow square windows, transoms and special windows. Vertical windows placed side by side would also be permissible. This provision would be limited to frontages only.*

- 3) **It has been stated in previous meetings that anyone who has been issued a development order or a building permit is exempt from these requirements, however this intentionally ignores properties which are being developed in accordance with their existing plat.**

Several of our members met with the City in advance of purchasing their properties to determine their proposed use is acceptable. Developers/builders have made very significant expenditures towards improvements and design since then and are now suddenly being told the requirements will change within a few months. The HBA request that the developers/builders who have been through the process be grandfathered in to avoid additional time and expense.

*Plat approvals authorize the subdivision of land and supporting infrastructure, they do not constitute a design approval for site development or an authorization to build.*

*Grandfathering must be limited to circumstances where a formal approval related to site development has been granted. Authorization must be limited to a set period of time, and based on a final set of plans. Since a final set of plans are typically unavailable, and therefore not considered during a pre-development or development review meeting, and no approval is granted or set time period established, these meetings cannot be considered for grandfathering.*

*Public outreach has extended over a period of more than six (6) months and included an extensive amount of public engagement, including more than sixteen (16) public input sessions, workshops, meetings and/or presentations. Developers/builders with current projects underway may either track the progression of the overlay and design its specifications or submit their projects for permitting prior to the anticipated effective date. Based on the Planning Board's recommendation and the current review schedule, the overlay is anticipated to take effect on the fifth business day after adoption or September 20, 2018, pending adoption.*

- 4) **Resolution 54-80, which formed the City's CRA, states the purpose of the CRA is the elimination of blight and "rehabilitation, conservation and redevelopment" of the CRA area. Subsequent resolution 55-80 directs the CRA to "Work with private investors, other government agencies, its agents and consultants, employees and community groups and interests to foster the development and redevelopment" of the CRA area. The HBA encourages the CRA to address these issues and work to make meaningful changes to the proposed CRA document. This will be helpful in fostering development or redevelopment.**

*The proposed CRA Urban Design Overlay District is intended to ensure that rehabilitated and redeveloped properties blend into the traditional character of the existing CRA neighborhoods, therefore, conserving the authenticity of these areas. The extensive public engagement process undertaken as a component of this project has proven to ensure that many, meaningful comments provided by private investors, outside government agencies, their agents and consultants, City staff, community groups and neighborhood associations, and the general public were incorporated into the final recommended overlay district. All comments provided have been addressed to the extent practicable.*

We look forward to continued coordination as the overlay progresses. Should you require any further information, please do not hesitate to contact me at (850) 436-5650 or [hgibson@cityofpensaocla.com](mailto:hgibson@cityofpensaocla.com).

Sincerely,

A handwritten signature in black ink, appearing to read "M. Helen Gibson". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

**M. Helen Gibson**  
CRA Administrator

Cc: file  
Victoria D'Angelo, Asst. CRA Administrator

Enclosures: None.



Charles S. Liberis

Real Estate Closing Department  
Kaylan Walden- Licensed Closing Agent

June 11, 2018

Ms. Helen Gibson  
*CRA Administrator*  
The Community Redevelopment Agency (CRA) of City of Pensacola  
222 W. Main St., Third Floor  
Pensacola, FL 32502

**RE: Proposed CRA Urban Design Overlay**

Dear Ms. Gibson:

I write this letter on behalf of Olde City Developers, LLC. In the past 24 months, Olde City has constructed (and sold) 22 houses in the Government and Intendencia core area. Those houses were affordable and proved to be very popular. All 22 houses were sold before completion and are now on the tax rolls replacing vacant lots or abandoned buildings. The proposed regulation would have prevented this vital revitalization.

A few examples:

1. Page 28, Illustration 12-2-25.9 demonstrates that parking on one's lot will not be allowed unless it is at least 20' behind the principal building façade. For a 30' wide lot, this means the width of the home would need to be reduced from 20' to 15' to have any parking on site. This would have prevented development of all 22 houses completed by Olde City Developers, LLC.
2. It has been previously stated that anyone who has obtained a development order or building permit is exempt from these requirements. This ignores properties which are being developed in accordance with their existing plat. Olde City has purchased 16 lots for future development in the Government and Intendencia core area. Olde City has made significant expenditure on engineering and design. These changes will impose a financial hardship and greatly increase the cost of infill housing. We wish to build similar houses and do not want to reinvent what has worked and been well received by all.

**PENSACOLA** (reply here)  
212 West Intendencia Street  
Pensacola, FL 32502  
(850) 438-9647 Fax (850) 433-5409

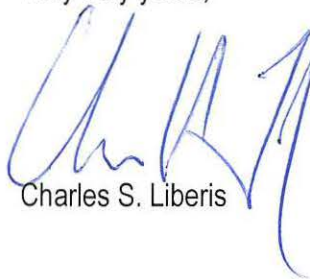
[www.liberislaw.com](http://www.liberislaw.com)

**PERDIDO KEY**  
13700 Perdido Key Dr., Suite 223  
Pensacola, FL 32507  
(850) 492-2109



Resolution 55-80 directs the CRA to "Work with private investors, other government agencies, its agents and consultants, employees and community groups and interests to foster the development and redevelopment" of the CRA area. Notwithstanding, numerous meeting and workshops, the CRA has failed to address the issues facing developers and builders nor to address needed changes to the proposed CRA document. Adoption of the proposed CRA Urban Development Design Overlay will discourage future development of the CRA area.

Very truly yours,



Charles S. Liberis

CSL/kw

cc: Mayor Ashton Hayward

City Council

PNJ





COMMUNITY REDEVELOPMENT AGENCY

July 18, 2018

Liberis Law Firm  
Attn: Charles S. Liberis  
212 West Intendencia Street  
Pensacola, FL 32502

**Re: PROPOSED CRA URBAN DESIGN OVERLAY DISTRICT**

Dear Mr. Liberis:

Thank you for providing comments in reference to the proposed CRA Urban Design Overlay District. You have submitted meaningful feedback to us which has been addressed and incorporated into the final recommended document to the extent practicable. Please find below a summary of the items of concern presented to us and their corresponding response(s):

- 1) I write this letter on behalf of Olde City Developers, LLC. In the past 24 months, Olde City has constructed (and sold) 22 houses in the Government and Intendencia core area. Those houses were affordable and proved to be very popular. All 22 houses were sold before completion and are now on the tax rolls replacing vacant lots or abandoned buildings. The proposed regulation would have prevented this vital revitalization.**

*Thank you for your investment in the CRA area. Models of special review districts, new codes and design standards in many cities prove that while Land Development Code (LDC) changes may require adaptation, they do not prevent revitalization. In fact, urban planning efforts such as the proposed overlay district, protect real estate and development investments by providing predictable outcomes which enhance market strength and stability.*

- 2) Page 28, Illustration 12-2-25.9 demonstrates that parking on one's lot will not be allowed unless it is at least 20' behind the principal building facade. For a 30' wide lot, this means the width of the home would need to be reduced from 20' to 15' to have any parking on site. This would have prevented development of all 22 houses completed by Olde City Developers, LLC.**

*To allow for wider homes on 30-foot lots, parking requirements have been modified to allow driveways within a maximum of two feet from the property line. Options for wider homes on 30-foot lots also include on-street parking, where permitted, and rear access, where feasible.*

- 3) It has been previously stated that anyone who has obtained a development order or building permit is exempt from these requirements. This ignores properties which are being developed in accordance with their existing plat. Olde City has purchased 16 lots for future development in the Government and Intendencia core area. Olde City has made significant expenditure on engineering and design. These changes will impose a financial hardship and greatly increase**

EVERYTHING THAT'S GREAT ABOUT FLORIDA IS BETTER IN PENSACOLA.

222 West Main Street Pensacola, FL 32502/T: 850.436.5650/[www.cityofpensacola.com](http://www.cityofpensacola.com)

**the cost of infill housing. We wish to build similar houses and do not want to reinvent what has worked and been well received by all.**

*Any development which has obtained a development or building permit by the effective date would be exempt from the overlay district requirements.*

*Plat approvals authorize the subdivision of land and supporting infrastructure, they do not constitute a design approval for site development or an authorization to build.*

*Grandfathering must be limited to circumstances where a formal approval related to site development has been granted. Authorization must be limited to a set period of time, and based on a final set of plans. Therefore, grandfathering is limited to the issuance of a building permit or development order.*

*Public outreach has extended over a period of more than six (6) months and included an extensive amount of public engagement, including more than sixteen (16) public input sessions, workshops, meetings and/or presentations. Developers/builders with current projects underway may either track the progression of the overlay and design to its specifications or submit their projects for permitting prior to the anticipated effective date. Based on the Planning Board's recommendation and the current review schedule, the overlay is anticipated to take effect on the fifth business day after adoption or September 20, 2018, pending adoption.*

*Additionally, CRA staff has surveyed local builders and architectural firms to determine the estimated costs associated with the proposed standards. Associated costs were determined to be nominal, especially when factoring potential cost reductions related to parking exemptions.*

- 4) **Resolution 54-80, which formed the City's CRA, states the purpose of the CRA is the elimination of blight and "rehabilitation, conservation and redevelopment" of the CRA area. Subsequent resolution 55-80 directs the CRA to "Work with private investors, other government agencies, its agents and consultants, employees and community groups and interests to foster the development and redevelopment" of the CRA area. The HBA encourages the CRA to address these issues and work to make meaningful changes to the proposed CRA document. This will be helpful in fostering development or redevelopment.**

*The proposed CRA Urban Design Overlay District is intended to ensure that rehabilitated and redeveloped properties blend into the traditional character of the existing CRA neighborhoods, therefore, conserving the authenticity of these areas. The extensive public engagement process undertaken as a component of this project has proven to ensure that many, meaningful comments provided by private investors, outside government agencies, their agents and consultants, City staff, community groups and neighborhood associations, and the general public were incorporated into the final recommended overlay district. All comments provided have been addressed to the extent practicable.*

We look forward to continued coordination as the overlay progresses. Should you require any further information, please do not hesitate to contact me at (850) 436-5650 or [hgibson@cityofpensaocla.com](mailto:hgibson@cityofpensaocla.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'M. Helen Gibson', with a stylized, cursive script.

**M. Helen Gibson**  
CRA Administrator

Cc: file  
Victoria D'Angelo, Asst. CRA Administrator

Enclosures: None.