

April 8, 2026

Development Services

Attn: Chad Minor | Director

Holmes Beach City Government

Development Services

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Holmes Beach, FL 34217

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Re: Comprehensive Plan Amendment(s) and Zoning Map Amendment

Introduction:

On behalf of the applicant and owner, Florida-Bahamas Synod of the Evangelical Lutheran Church in America, Inc. (FKA Gloria Dei Evangelical of Anna Maria Island), we wish to file applications for a Comprehensive Plan Map Amendment (CPA), Comprehensive Plan Text Amendment (CPA), and a Zoning Map Amendment (RZ) to be reviewed as companion applications.

1. Project Description:

The applicant requests approval of two Comprehensive Plan Amendments and a Zoning Map Amendment for approximately 2.96 acres of land located at 6608 Marina Drive at the intersection of Palm Drive and Marina Drive in the City of Holmes Beach. The subject property consists of three contiguous parcels (PIDs: 7149700002, 7132600003, and 7133000005) currently developed as a church.

Comprehensive Plan Amendment Request:

- a) Map Amendment – Change the Future Land Use Category from Public/Semi-Public (P/SP) to Low Density Residential (LDR),
- b) Text Amendment to reduce the City’s Future Land Use Distribution for Public/Semi-Public (P/SP) from 25.8 acres to 22.84 acres; and increase the Low Density Residential Future Land Use Category from 331.3 acres to 334.26 acres

Zoning Map Amendment Request:

- c) Rezone from Public/Semi-Public (PSP) to R-1 (Single Family Residential).

The proposed entitlements allow for up to seventeen (17) single-family residential units consistent with the maximum gross density permitted under the LDR Future Land Use Category. A conceptual plan has been prepared to illustrate a potential layout; however, final design will be determined at site plan approval.

2. Existing Conditions:

The subject property is designated P/SP on the adopted Future Land Use Map and zoned PSP. The property is currently developed with a 6,437 square foot church building on 1.94 acres that takes direct access from Palm Drive. The remaining acreage of the subject property consists of two vacant parcels adjacent to the north consisting of approximately 1.02 acres.

The subject property was designated with the P/SP Future Land Use category with the adoption of the Comprehensive Plan. It is likely that this designation was selected because the church was an existing use on the property at that time. The Glorinda Dei Lutheran Church on Anna Maria Island in Holmes Beach was founded on August 3, 1958. The existing church building was completed in 1959 and was in continuous operation until its final service on January 18, 2025. Over time, fewer and fewer members of the church's congregation were willing or able to travel to Anna Maria Island to attend the church services. Accordingly, for the good of the church, the decision was made to move the church off the island. At that time, the church structure was utilized as a daycare until the hurricanes of 2024, and the church has remained vacant and unused since that time. Due to the designation of the P/SP future land use category, there are no reasonable uses of the property that are permitted by the City's Comprehensive Plan available to the owners at this time.

The subject property lies within the Coastal Planning Area and the Coastal Evacuation Area (Zone A), and within Flood Zone AE. Based on current information, the subject property does not appear to contain any on-site wetlands.

3. Surrounding Land Use and Compatibility:

The subject property is surrounded by existing residential development. To the north and northwest are Medium Density Residential uses with R-2 zoning. To the west, across Palm Drive, are additional R-2 zoned properties. To the east and southeast, across Marina Drive, are existing Low Density Residential uses zoned R-1.

The proposed LDR FLU category and R-1 zoning is compatible and consistent with the surrounding development pattern.

4. Proposed Development Program:

The Low Density Residential Future Land Use category allows a maximum density of up to 5.8 dwelling units per gross acre. Based on the subject property's 2.96 acres, the property supports a maximum gross density of seventeen (17) single-family dwellings for a gross density of 5.74 du's/acre.

5. Consistency with Comprehensive Plan:

The proposed amendment(s) reduces potential intensity compared to institutional uses, aligns with surrounding residential development, and supports infill redevelopment within an established neighborhood. The subject property is located inside the Coastal Evacuation Area and Flood Zone AE; however, the proposed use is consistent with surrounding residential densities and does not introduce increased evacuation demand beyond typical residential development.

FUTURE LAND USE

The proposed Comprehensive Plan Amendment is consistent with the Future Land Use Element, which emphasizes the protection of the City's predominantly single-family residential character and the compatibility of land uses.

Goal 1:

Ensure that the predominantly single family residential character of the City of Holmes Beach is maintained and protected while promoting the provision of sustainable and resilient housing opportunities for a population which is diverse in its range of age and income levels and recognizing the potential for economic benefit resulting from the tourist trade.

Further, the City encourages owner operator businesses and the redevelopment of the town center in a way that showcases the City's coastal charm.

Finally, the City realizes its obligation to minimize any threat to health, safety, and welfare posed by hazards, nuisances, incompatible land uses, and to minimize environmental degradation.

Response: The proposed amendment supports Goal 1 by changing the subject property from Public/Semi-Public to Low Density Residential and by aligning the subject property with the surrounding residential development pattern. Moreover, as the current P/SP one is very limited with regard to permitted uses, and as the existing church use is no longer a viable option, there is no reasonable use of the property available to the current owner under the existing future land use designation. The proposed Low Density Residential will permit the property to be redeveloped with additional, sustainable and resilient housing options, rather than leaving the property vacant, unused and deteriorating.

Policy 1.1.1:

The City shall continue to enforce land development regulations which recognize the limitations of development on a barrier island (e.g., vulnerability of tropical storms, topography and soil conditions). Such regulations shall, at a minimum, contain provisions which:

- Regulate the subdivision of land.
- Protect the limited amount of marine wetlands and other environmentally sensitive natural resources found in the community.
- Regulate signage and outdoor lighting.
- Ensure that all development is consistent with Federal Flood Insurance regulations.
- Ensure that all development is consistent with coastal construction regulations.
- Ensure the compatibility of adjacent land uses and require adequate and appropriate buffering.
- Ensure that development orders and permits are issued only when it is documented that such development is consistent with the maintenance of adopted level of service standards.
- Provide for proper drainage and stormwater management, minimize impervious surface area and improve resiliency from storm surge and sea level rise.
- Provide requirements for the provision of open space, and safe and convenient on-site traffic flow and parking requirements.

- Encourage the use of native or Florida Friendly vegetation in the landscaping. Discourage the use of invasive vegetation, trees with poor wind tolerance, and artificial turf or similar surface areas.
- Provide requirements for the control of erosion and runoff from construction sites.
- Reasonably ensure that newly planted trees are located in a manner that will require no more than minimal trimming in order to avoid power lines.

Response: The proposed amendment will remain subject to the City's land development regulations governing barrier island development, including subdivision, floodplain, coastal construction, drainage, stormwater, and compatibility requirements.

Policy 1.2.3:

Existing residential areas shall be protected from the encroachment of incompatible activities; likewise, other land use areas shall be protected from the encroachment of incompatible residential activities.

Response: The proposed amendment is consistent with Policy 1.2.3 because the requested change to Low Density Residential and R-1 will align the subject property with the surrounding residential area and will not introduce any incompatible activity into the existing neighborhood pattern.

Policy 1.2.5:

Residential land development shall take place in a manner which is compatible with the type and scale of surrounding uses and any adjacent environmentally sensitive natural resources. Buffering or landscaping may be required to mitigate differences in scale between new construction and existing adjacent use.

Response: The proposed amendment is consistent with Policy 1.2.5 because the requested Low Density Residential designation is compatible with the type and scale of the surrounding residential uses. Based on current information, the subject property does not appear to contain on-site wetlands.

Policy 1.2.6:

The location and extent of residential land uses shall be in accordance with the Future Land Use Map and the descriptions of types, sizes, and densities of land uses contained in this Element.

Response: The proposed amendment is consistent with Policy 1.2.6 because the application requests an amendment to the Future Land Use Map to designate the subject property as Low Density Residential, and the proposed density of up to 5.8 dwelling units per gross acre is consistent with that category. Compliance with R-1 zoning development standards shall be demonstrated at time of site plan approval.

COASTAL

The proposed amendment is also evaluated under the coastal policies contained in the Future Land Use Element.

Goal 4:

The promotion of sound coastal management shall be encouraged to ensure that maximum long-term benefits are attained in the use of the coastal zone by the residents of and visitors to the City of Holmes Beach.

Response: The subject property is located within the Coastal Planning Area and Coastal Evacuation Area (Zone A). The proposed amendment does not seek to increase density beyond the Low Density Residential category and is consistent with the surrounding residential development pattern.

Policy 5.1.2:

Within the identified coastal high hazard area (CHHA), the City shall, to the extent practical, limit public expenditures that subsidize development only to existing development or new development which is consistent with the Future Land Use Map.

Response: The proposed amendment is consistent with Policy 5.1.2 because the application seeks to amend the Future Land Use Map so that any future development of the subject property is consistent with the adopted Future Land Use Map, which will only permit low density residential development consistent with the surrounding neighborhoods.

Policy 5.1.3:

Hurricane clearance times shall be maintained or reduced through continued support of the Anna Maria Island Emergency Operations Center and cooperation with Manatee County Division of Emergency Management.

Response: The proposed amendment is consistent with Policy 5.1.3 as the proposed Low Density Residential development is limited to seventeen (17) single-family residential units, and the traffic analysis prepared for the application compares the existing potential development scenario to the proposed residential scenario, and the result is fewer anticipated vehicle trips for the proposed residential development than what is permitted on the property under the current future land use category.

TRANSPORTATION

The proposed amendment is also evaluated under the Transportation Element.

Policy 1.1.5:

All development orders and permits shall be issued only when it is documented that such development is consistent with the approved level of service standards adopted by this Comprehensive Plan.

Response: The proposed amendment is consistent with Policy 1.1.5 because a transportation analysis has been prepared comparing the existing potential development under the current designation to the proposed residential development, and the result is fewer anticipated vehicle trips for the proposed residential development than what is permitted on the property under the current future land use category.

Policy 1.3.14:

Through site plan review, connections/access points of driveways resulting from new or redevelopment activities shall not hinder/impede the traffic flow or safety on the adjacent roadway system.

Response: The conceptual plan contemplates access from Marina Drive. Final access design will be determined at the time of site plan review and will be required to comply with Policy 1.3.14.

6. Transportation Considerations:

Response: A methodology meeting was conducted with City officials to discuss the method by which the existing conditions can be compared to the proposed conditions (LDR FLUC and R-1 zoning).

The existing P/SP Future Land Use Category allows institutional uses that generate concentrated peak-hour traffic. The proposed residential development generates lower and more distributed traffic patterns. Traffic analysis compares the existing worst-case scenario to the proposed residential build out of seventeen (17) single-family residential dwellings.

For trip generation comparison purposes, a 50,000 gross square foot school building was converted to student enrollment using a planning ratio of approximately 122 gross square feet per student, consistent with Florida DOE typical elementary school facility parameters, resulting in an estimated enrollment of approximately 410 students

7. Compliance with Land Development Regulations (R-1 Zoning District):

The proposed rezoning of the subject property from Public/Semi-Public (PSP) to R-1 (Single Family Residential) has been evaluated for compliance with the applicable requirements of the R-1 zoning district. The subject property is capable of being developed in accordance with these standards, as outlined below.

A. Permitted Uses:

The R-1 zoning district permits single-family residential dwellings as principal uses, along with customary accessory uses and essential services. The proposed development program consists solely of single-family residential dwellings, which are permitted within the R-1 district.

B. Minimum Lot Area and Density:

The R-1 zoning district requires:

- Minimum Lot Area: 7,510 square feet
- Maximum Density: 5.8 dwelling units per gross acre

The subject property is approximately 2.96 acres, which allows a maximum density of approximately:

$$2.96 \text{ acres} \times 5.8 \text{ du/ac} = 17.17 \text{ dwelling units}$$

As such, the proposed project site can accommodate up to seventeen (17) dwelling units in compliance with the maximum allowable density of the LDR Future Land Use Category in the implementing zoning district of R-1. The conceptual development program is consistent with these density limitations and allows for a subdivision of lots meeting the minimum lot area requirement.

C. Minimum Lot Width and Frontage:

The R-1 zoning district requires:

- Minimum Lot Width and Frontage: 75 feet

The subject property has sufficient width and configuration to allow a subdivision into lots that can comply with these minimum requirements.

D. Yard Setbacks:

The R-1 zoning district establishes the following minimum setbacks:

- Front Yard:
 - 20 feet (first habitable story)
 - 25 feet (second habitable story)
- Side Yard:
 - 10 feet (first habitable story)
 - 15 feet (second habitable story)

- Rear Yard:
 - 10 feet (first habitable story)
 - 15 feet (second habitable story)

The conceptual site plan demonstrates that residential lots can be configured to accommodate building envelopes that can comply with these setback requirements.

E. Building Height:

The R-1 zoning district limits building height to:

- Maximum Height: 36 feet above the crown of the street.

Future development will be required to comply with this height limitation

F. Lot Coverage and Impervious Surface:

The R-1 zoning district establishes:

- Maximum Building Coverage: 30%
- Maximum Impervious Surface Coverage: 40%

The subject property is of sufficient size to accommodate residential development that complies with these limitations, including the provision of pervious areas and stormwater management facilities.

G. Minimum Floor Area:

The R-1 zoning district requires:

- Minimum Living Area: 1,000 square feet per dwelling unit

The proposed development will meet or exceed this requirement.

H. Additional Development Standards:

The R-1 zoning district also includes provisions related to:

- More than one dwelling: More than one dwelling may be constructed on a single parcel provided the parcel is large enough (7,510 square feet per dwelling).
- Adjacent lots or parcels under single ownership: In the case of adjacent lots or parcels owned by a single owner, the lots may be considered a single building plot and the district regulations applying to the minimum size requirements apply to the building plot as a whole. Spacing of buildings: When more than one separate building or structure is erected upon a single parcel, the building lines of the buildings must be separated by a minimum of 20 feet for structures with one habitable story and 30 feet if either or both buildings contain more than one habitable story.
- Prohibition against short-term occupancy: (1) No dwelling or parcel shall be leased, subleased or rented for a term of less than 30 consecutive days and such occupancy shall be by the same individual or family. (2) No time sharing interval associated with any dwelling or parcel shall be for a term of less than 30 consecutive days. (3) No dwelling unit owned, leased, or rented by any corporate entity (including not-for-profit entities), shall be made available to

employees, contractors, subcontractors, executives, officers, clients or guests of said corporate entity for periods of occupancy of less than 30 consecutive days and such occupancy shall be by the same individual or family. (4) When the term "rented" or any derivation of that term is used in this subsection, the meaning of that term shall include the donation or offer of use of a dwelling for a charitable or non-charitable auction or other platform on which the dwelling is offered for use without full or partial compensation payable to the owner or property manager. The definition shall exclude the use of a dwelling by a relative of the owner or when the dwelling is made available to a person without direct or indirect compensation payable to the owner or property manager and not made available for use through an auction or other platform that makes the dwelling available to third parties.

- Required parking: Refer to subsection 8.19.D.2.

8. Access and Circulation

The subject property has frontage along Palm Drive and Marina Drive. Existing access is from Palm Drive. The conceptual plan contemplates access from Marina Drive, which better integrates with the surrounding residential network.

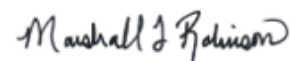
9. Utilities:

Please see email correspondence with the County Engineer. Adequate public water and wastewater utilities are available to connect to the subject property.

10. Public Interest:

The proposed amendment promotes compatibility, reduces intensity, reinforces neighborhood character, and supports context-sensitive infill development.

Sincerely,



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