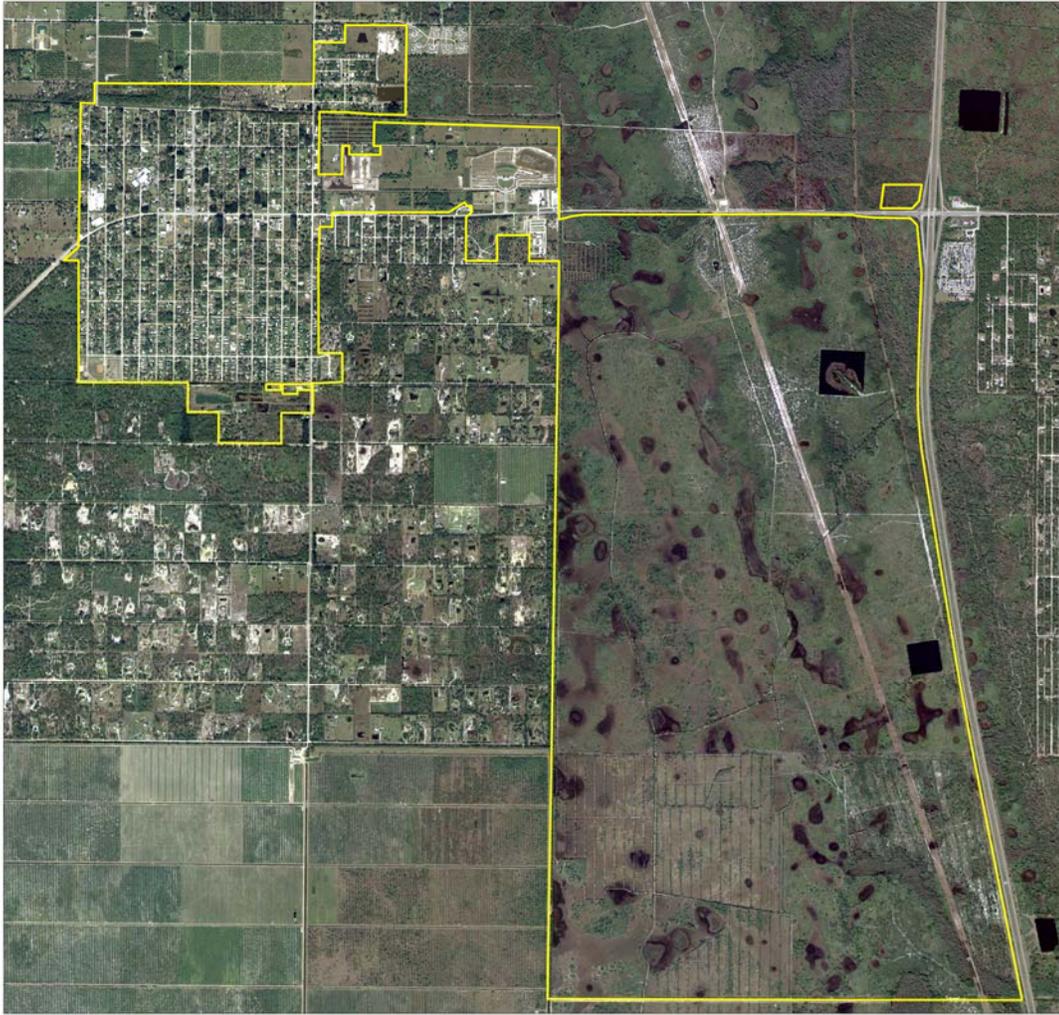


FINAL REPORT
City of Fellsmere Findings of Necessity

Preserve, Reinvest, Revitalize
Blight Study Technical Memo



PREPARED FOR THE HONORABLE
MAYOR
CITY COUNCIL
CITY MANAGER
CITY STAFF

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Introduction

Fellsmere's history is as rich and varied as the sweet citrus contained within and outside its borders. Founded in 1911 and named after E. Nelson Fell, Fellsmere boasts a population today of over 4,400 people. That is, until it is time for the citrus to be picked, when the population grows to an estimated 7,000 people.

Quite different from the early years of the City, when the Dinky Line and trains brought people and goods westward from the boats docked in the Indian River and sweet Indian River citrus eastward from Fellsmere Farms. One thing remains steady—the population is about 73% Latino, mostly Mexican migrants, who left home to pick fruit or do odd jobs in the off season. Fellsmere Farms had a major influence on the City, carving hundreds of miles of canals to provide a drainage system for the fruit to grow. Fellsmere Farms is still one of the largest employers in the area.



The Dinky Line of the Trans-Florida Central Railway was originally constructed for Fellsmere Farms and was completed in September 1910 between Fellsmere and Sebastian to carry logs cut in the swamps to the FEC interchange and carry supplies back to Fellsmere. On May 1, 1911 the line officially opened to the public. There were two passenger stops (River Bridge and Kitching) and the fare for the whole distance was 25 cents. By 1920, the line was extended 6 miles to Broadmoor. Most of these rail trucks were home-built using available parts and the results range from the Model "T" to the #39

(International Harvester), to the 'monster' double ender. The Trans-Florida Central Railway was incorporated on February 18, 1924. It was affectionately dubbed the "dinky line" by the locals. The Trans-Florida Railway was officially abandoned on November 30, 1952, just over 42 years from its beginning.

Fellsmere has never been a wealthy community, except perhaps for a while during the early boom period before the Great Depression, when Federal period commercial buildings lined the main street, still named Broadway. The Estate Building, the Hotel, Fell Library, the Feed and Seed Store, and other graceful buildings remain today as remnants of a time of prosperity. The Estate Building has been made into a fine restaurant, where one can dine on the "Frog Legs" unique to Fellsmere,



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Alligator tail, and other delights of old Florida. The Bank has been converted into the Community Center.

The Community Church and Old Fellsmere Elementary School, both of which are on the National Register, still stand, sentinels to an historic past, that is readying itself to launch into the 21st century with new growth, new population trends, and expanding borders. The citizens of Fellsmere formed the SOS (Save Our Old School) committee to save the Fellsmere Elementary School. Built in 1916, it is a beautiful brick 2-story building, built in the old Prairie style of architecture. Fundraisers and grants are being sought to save the school.

An historically significant neighborhood, Hall-Carter-James (HCJ) subdivision, is the traditional African-American neighborhood in the City.



Despite the best efforts and hundreds of thousands of dollars being spent at improving roads, providing recreation and parks, and some housing rehabilitation, the neighborhood, regrettably, with some exceptions, is severely blighted. Historical information reveals that: "Fellsmere's historic African-American settlement began with the arrival of the Fellsmere Farms Company, which in 1910 employed some 10 black laborers to help construct the railroad and cook for the survey party that laid out the development. A settlement emerged outside of the town plan at the northeast corner of the settlement, where several of Fellsmere's early leaders owned large tracts. Relatively small and roughly bounded by the railroad, Willow and Booker Streets, the area was settled about 1911. In 1913, a school opened, with B.F. James as the instructor. The



settlement expanded over time as the need for laborers increased with the development of packing houses, and planting of new citrus groves and vegetable fields. Between 1912 and 1914, J.G. Carter, R.L. James, and Murray Hall, Fellsmere merchants and community leaders, subdivided the property. The plan guided development using rectilinear blocks, with 40' building lots and a central park. By the mid 1920s, a relatively comprehensive community had emerged that supported some 25 families. Nearly thirty buildings

dotted the settlement, including dwellings, churches, and a general store. Several new buildings appeared during the 1920s land boom and the period of the Great Depression of the 1930s.

Between the rich history and promising future however, stand two corridors and a neighborhood that suffer from blighting conditions that keep the City from receiving new private and public investment—high crime, dilapidated buildings, high vacancy rates, property values disproportionately lower than the rest of the area, transportation problems, inappropriate land uses, lack of parking, vacant lands and a general lack of beautification that hampers development potential. The historic hotel stands in disrepair, in trouble of being torn down due to the extensive costs to rehabilitate it under today's regulations. Other historic structures have been lost.



Statutory Background

Local Governments must establish that a given area is blighted, and that the revitalization and redevelopment of that area is in the interests of the community. Using the best available data, this blight study: establishes the existence of blighted conditions; identifies the specific problems that may be addressed through adoption of a Redevelopment Plan; and more importantly, creates the findings of necessity for use by the City and County in designating the area and delegating authority for an expansion of the existing CRA.

The purpose of this study is to determine if there are areas of the City that qualify under Chapter 163, Part III, to establish a Community Redevelopment Area. The City engaged Lawandales Planning Affiliates, LPA, to assess existing conditions to determine if the statutory definition of slum and/or blight is applicable to the CR 512 corridor, Broadway, Hall-Carter neighborhood, and other nearby streets. The Blight Study Area (BSA) is shown on Map 1.

Chapter 163, Part III "Blight"

In general, Blight is a set of negative physical circumstances that makes an area a burden to the greater community. As a whole, these circumstances discourage the development and redevelopment of individual properties in the area and within the surrounding neighborhoods. Blight is rooted in a basic lack of investment and maintenance. The Community Redevelopment Act requires that the Blight Study Area (BSA) fit the definition of a "blighted area" if the City is to use the powers provided by the Act for redevelopment activities.



"Blighted area," means either of the following as paraphrased from section 163.340 Chapter 163 FS:

1. "Blighted area" means an area in which there are a substantial number of deteriorated, or deteriorating structures, in which conditions, as indicated by government-maintained statistics or other studies, are leading to economic distress or endanger life or property, and in which two or more of the following factors are present:
 - (a) Predominance of defective or inadequate street layout, parking facilities, roadways, bridges, or public transportation facilities;

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- (b) Aggregate assessed values of real property in the area for ad valorem tax purposes have failed to show any appreciable increase over the 5 years prior to the finding of such conditions;
 - (c) Faulty lot layout in relation to size, adequacy, accessibility, or usefulness;
 - (d) Unsanitary or unsafe conditions;
 - (e) Deterioration of site or other improvements;
 - (f) Inadequate and outdated building density patterns;
 - (g) Falling lease rates per square foot of office, commercial, or industrial space compared to the remainder of the county or municipality;
 - (h) Tax or special assessment delinquency exceeding the fair value of the land;
 - (i) Residential and commercial vacancy rates higher in the area than in the remainder of the county or municipality;
 - (j) Incidence of crime in the area higher than in the remainder of the county or municipality;
 - (k) Fire and emergency medical service calls to the area proportionately higher than in the remainder of the county or municipality;
 - (l) A greater number of violations of the Florida Building Code in the area than the number of violations recorded in the remainder of the county or municipality;
 - (m) Diversity of ownership or defective or unusual conditions of title which prevent the free alienability of land within the deteriorated or hazardous area; or
 - (n) Governmentally owned property with adverse environmental conditions caused by a public or private entity.
2. However, the term "blighted area" also means any area in which at least one of the factors identified in paragraphs (a) through (n) are present and all taxing authorities subject to s. 163.387(2)(a) agree, either by interlocal agreement or agreements with the agency or by resolution, that the area is blighted. Such agreement or resolution shall only determine that the area is blighted. For purposes of qualifying for the tax credits authorized in chapter 220, "blighted area" means an area as defined in this subsection.

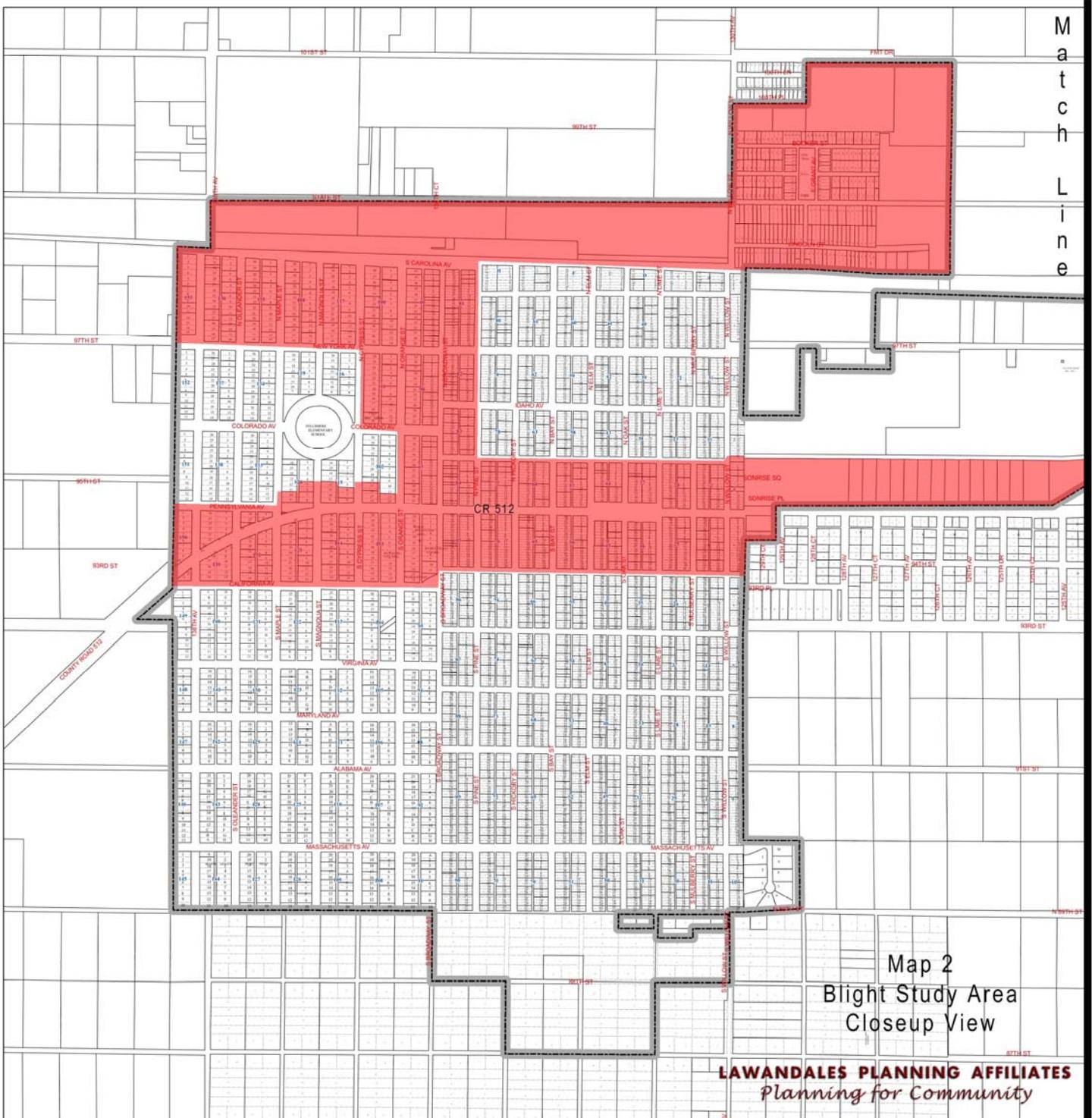
Map 1 indicates the BSA as it related to the rest of the City of Fellsmere. Map 2 & 3 are a closer view of the BSA areas.



Map 1
Blight Study Area

LAWANDALES PLANNING AFFILIATES
Planning for Community

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Blighted Conditions Overview

Over the years Fellsmere, has become one of the most economically distressed areas in Indian River County. A review of demographic data from the Florida Housing Data Clearinghouse indicates several key facts:

1. Fellsmere has a higher number of substandard dwellings than the County; and a higher percentage per capita than other cities in Indian River County
2. Fellsmere has a higher percentage of renters to owners than the County-29% versus 22%
3. 34% of Fellsmere residents have more than 1 person per room, versus 2.9% in the County
4. Fellsmere boasted 41% mobile homes as permanent units in 2002, vis-à-vis the 10.5% in the County
5. And while sales prices of homes in the County have doubled and tripled, in 2002, the median sales price of a home was \$77,000
6. 30% of Fellsmere's population in 2002 earned less than 80% of the area's median income; it is estimated that approximately 60% of those in HCJ earned less than 50% of the median income.
7. While the median income for the County hovered around \$50,900 for a family of 4 in 2004, the median income for the City fluctuates between \$18,000 according to one Chamber of Commerce internet site up to \$25,000 from other demographic data for agricultural workers, the primary "industry" in Fellsmere.
8. In 2002, 24% of Fellsmere's population paid more than 30% of their income on housing.
9. In 2000, the median gross rent was the lowest in the county.
10. While Fellsmere grew by 15%, which amounted to only 600 people, other sections of Indian River County grew by the thousands.
11. While SR 60 has seen a boon with developments such as Pointe West and other major commercial developments, and while Wal-Mart and Publix have gone to nearby Cities, Fellsmere's commercial corridor has languished.
12. While the County's homesteaded properties grew, meaning rising ownership levels, Fellsmere's did not keep pace. Furthermore, almost half of the new units built in Fellsmere were mobile homes or tax credit low-income housing.
13. While the County and its cities have enjoyed a variety of housing stock, Fellsmere has seen a rise in mobile home and affordable housing multi-family complexes, along with some sporadic single family.
14. Commercial and industrial assessed values have remained stagnant, rising little over the last 5 years, based upon records from the Indian River County Property Appraiser.

This new residential development has been in predominately in the southern portion of the City and the multi-family units have been northeast. Despite 600 new residents, commercial development has not found its way to the City. New subdivisions are breaking ground south of the City and new annexations will enable additional residential rooftops to spawn support for commercial development. A CRA is



needed to aid the market in

finding and directing the right kinds of development, installing infrastructure, providing rehabilitation assistance to businesses and homes, preserving neighborhoods and quality residential areas, retaining and supporting existing businesses, and expanding new business opportunities.

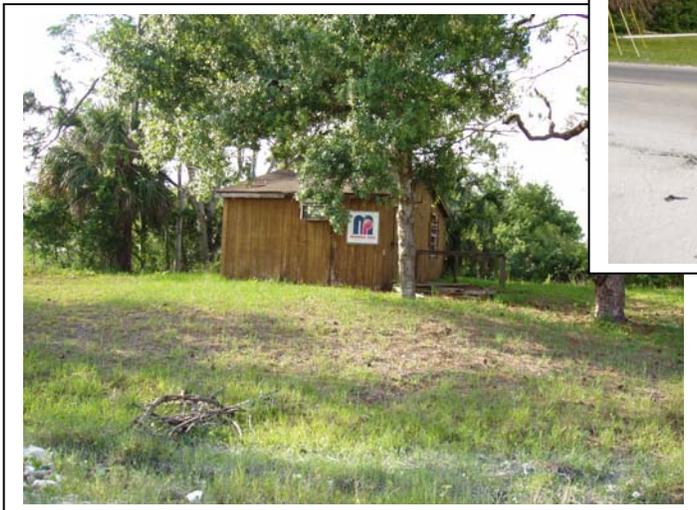


The areas of Broadway and CR 512, Fellsmere's traditional commercial centers, have seen rising vacancy and crime rates,

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and continue to decline. The areas around Broadway and CR 512 have not captured any new residential and little to no new commercial development. A new restaurant, Cendejas, failed; MESA Park failed; stores on Broadway are empty; some are even demolished. In a City of almost 5,000 people, there are only ethnic or convenience grocery stores. Residents must travel almost 15 miles to the nearest grocery store. Commercial and industrial lands with available utilities have sat dormant. Historic structures continue to decay.

The City has a great opportunity to arrest the decline by creating a Community Redevelopment Area (CRA) and establishing a pro-active, strategic redevelopment and economic development program. This Blight Study is the first step toward establishing a CRA. Evidence of meeting the statutory requirements is outlined in the following sections.



Land Usage/Zoning/Lot size/Lot lay-outs

In the BSA, Map 1 not only identifies the study area, but moreover, gives a clear indication lot sizes and configurations. The heart of the City was platted in the early 1900's. HCJ was platted in the 1920's. The lands between I-95 and Willow Street were platted years ago. Those plats, while useful at that time, pose an archaic framework for today's land development and market needs. Without some regulatory modifications, public sector incentives and intervention through a redevelopment agency, the conditions will worsen. HCJ was platted with 40' lots that remain in place today. The lands have also been bi-sected by changes in the roadway system, from the Murphy Act rights-of-way, changes to CR 512/Pennsylvania, and connections to Babcock. The transportation related problems will be discussed in more detail later in this report.

There are 441 parcels on 506.15 acres within the BSA. The area contains a mix of land uses: commercial, institutional, light manufacturing/industrial, and single family and multi-family residential. Most of the residentially used lands have been zoned for other uses, such as commercial, professional, or office for many years, but only a few conversions have occurred.

One problem with the current system of lots is the number of county, City, institutional, and other lands that are off the tax rolls in this area. From the old Fellsmere School, the City Hall, Community Center, Fire Station, churches, and other exempt lands, account for 55.18 acres or 11% of the total acreage in the BSA. Additionally, the School Board acquired 16 acres just outside the BSA, the location of the School, and some of the other uses on strategic lands, poses unique challenges to the development of the area. Additionally, St. Johns River Water Management District (SJRWMD) has acquired ten thousand acres, over 2000 of which separate portions of the City from other portions. This leads to a disconnect, but which can be overcome through eco-tourism, pedestrian connectivity, and prudent resource development that can aid economic development and redevelopment.



Table 1 provides an overview of the land use acreages. Of the total 506.15 acres, approximately 142 acres are developed. Of the 364.20 undeveloped acres, 221 were recently annexed, leaving 143 (28%) acres within the City that are undeveloped. Table 2 provides an overview of the zoning categories.

The Act recognizes that faulty lot sizes and configurations affect development patterns and often impair the sound economic growth of a given area. The BSA was platted in the late 1800's and early 1900's. While this has not affected the residential uses as much, the BSA is affected by a lack of parking, stormwater, small buildable areas, insufficient land to expand, incompatible adjacent uses, and problematic access due to archaic rights-of-ways, canal systems, and dirt roads. Residences still occupy commercially zoned lands, creating non-conformities. Changing the land development regulations will be needed to address these issues, creating a new plan and zoning system in the area will aid in attracting new development.

Broadway was the historical downtown commercial center. Buildings on the Corridor sit flush against the sidewalk, which is desirable in a main street setting where there is parking behind the structures or in a centralized location. The nature of retail and business along this corridor has changed dramatically. Small-scale sites are sometimes at a disadvantage. Today, the original platted lots have insufficient area to meet standard development requirements desired for today's commerce, so through a redevelopment district special considerations can be given for waivers and changes to the strict requirements of the code, without sacrificing value and still demanding high quality development.

In the area north of New York to South Carolina, in some other residential areas of the BSA, many homes are in standard condition and have assembled 3 or more lots for a buildable site. However, many of them are substandard and are rental, housing many more people than the homes were designed for and against current zoning. This area is devoid of paved roadways, much less sidewalks and good drainage. Many code violations exist in this area. Some of the houses are small historic bungalows that if cared for, could revitalize the area into a quaint neighborhood. City or CRA investments of infrastructure, sidewalks, landscaping, stormwater management, paving, and the like, could re-energize this decaying area. Otherwise, the crime and decay will continue, until someone aggregates the parcels for other commercial or mixed-uses.

Faulty lot sizes, shapes, location, and problematic title situations offer little if any value to a community. Lots and buildings are left vacant, leaving them havens for vagrants, illicit behavior, crime, and physical deterioration. These conditions contribute to visual and physical blight. This will hamper new investment opportunities and contribute to further deterioration area.

The City's land use and zoning system has remained unchanged for many years. As such, it has become archaic and a deterrent to smart growth and positive development patterns. Old platted lands, dating from the early part of the City's development, remain in place, providing a parcel system that has small lots, faulty lay-outs, in appropriate accessibility, contributes to poor drainage, and negates development of a sufficient size and type to produce overall community benefits.

Through a redevelopment program, the City can do improvements and aid the market in ways that a City cannot. This would include: creating incentives and grant/loan programs for existing business retention and recruitment; starting a business development assistance program; allowing for small lot developments to spur quality and value, but demanding certain architectural/site design features; providing incentives for lot assembly; provide waivers of some regulatory requirements that inhibit new quality business or residential development.

**TABLE 1
PROPOSED CRA AREA
Existing Land Use***

Land Use	Acres
<i>Vacant Lands</i>	
Residential	39.37
Commercial	49.17
Industrial	13.02
Agricultural	229.96
Forest/Parks/Recreational I	.09
County Foreclosed	.68
Municipal	8.6
Non-Agricultural Acreage <small>(ag class removed due to 2004 sale)</small>	23.31
<i>Subtotal Vacant Lands</i>	<i>364.20</i>
<i>Improved Lands</i>	
Residential	60.58
Commercial	16.04
Industrial	7.60
Agricultural	8.32
Institutional	38.81
County Foreclosed	.48
Municipal	8.12
Drainage	2.0
<i>Subtotal Improved Lands</i>	<i>141.95</i>
TOTAL	506.15

Source: LPA; July, 2005 figures were created by using Indian River County Property Appraiser Data.

TABLE 2

ACREAGE BY ZONING CATEGORY

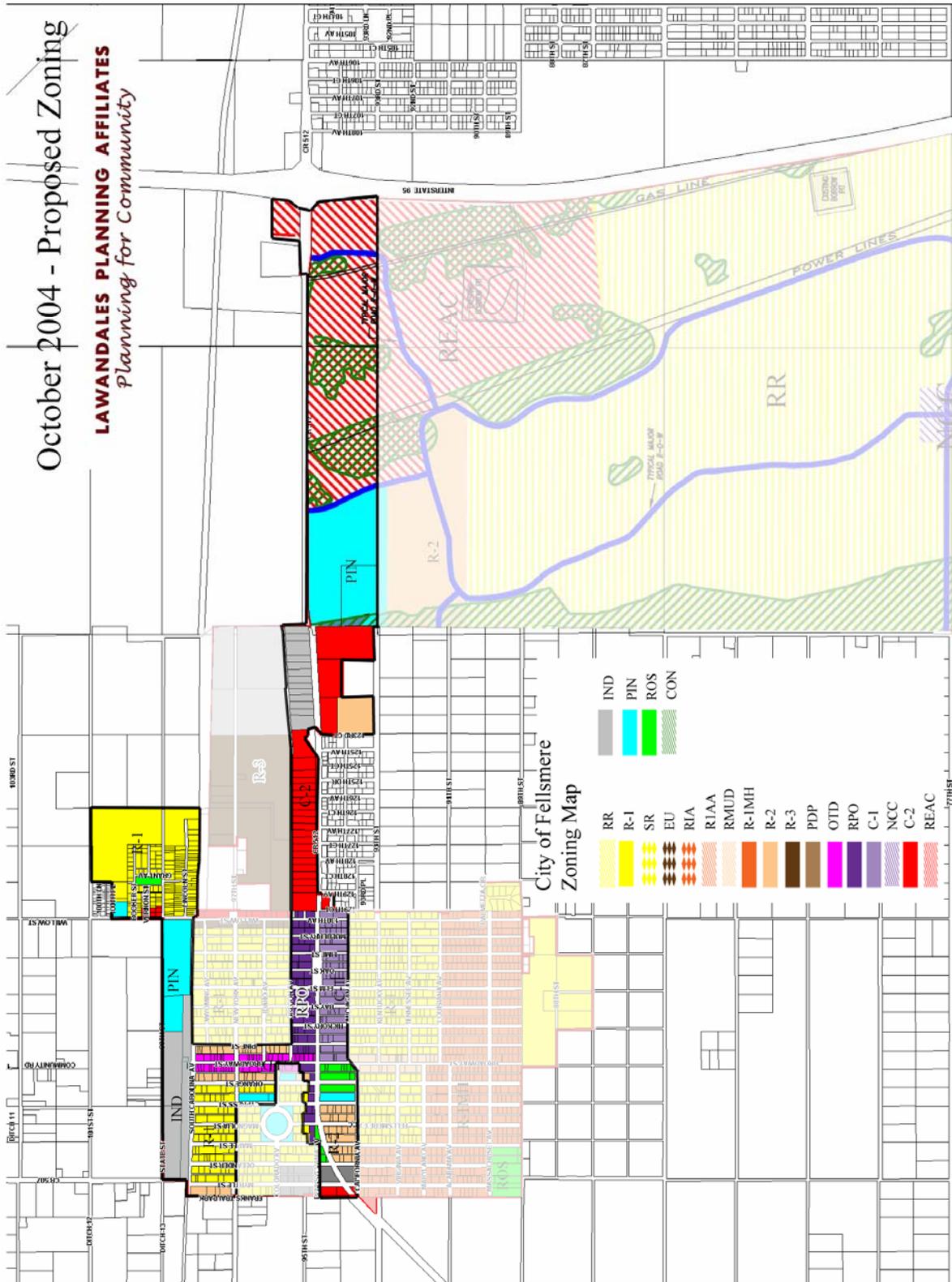
Zoning Category	Vacant	Built	Total
C-1	14.6	8.41	23.01
C-2	38.50	19.88	58.38
IND	13.32	8.21	21.53
OTD	2.97	3.75	6.72
PIN	1.76	27.07	28.83
R-1	65.02	32.7	97.72
R-2	3.51	10.57	14.08
ROS	.63	4.11	4.74
RPO	10.23	10.95	21.18
A-1*	229.96	0.00	229.96
Total	380.50	125.65	506.15

* Denotes County Zoning/

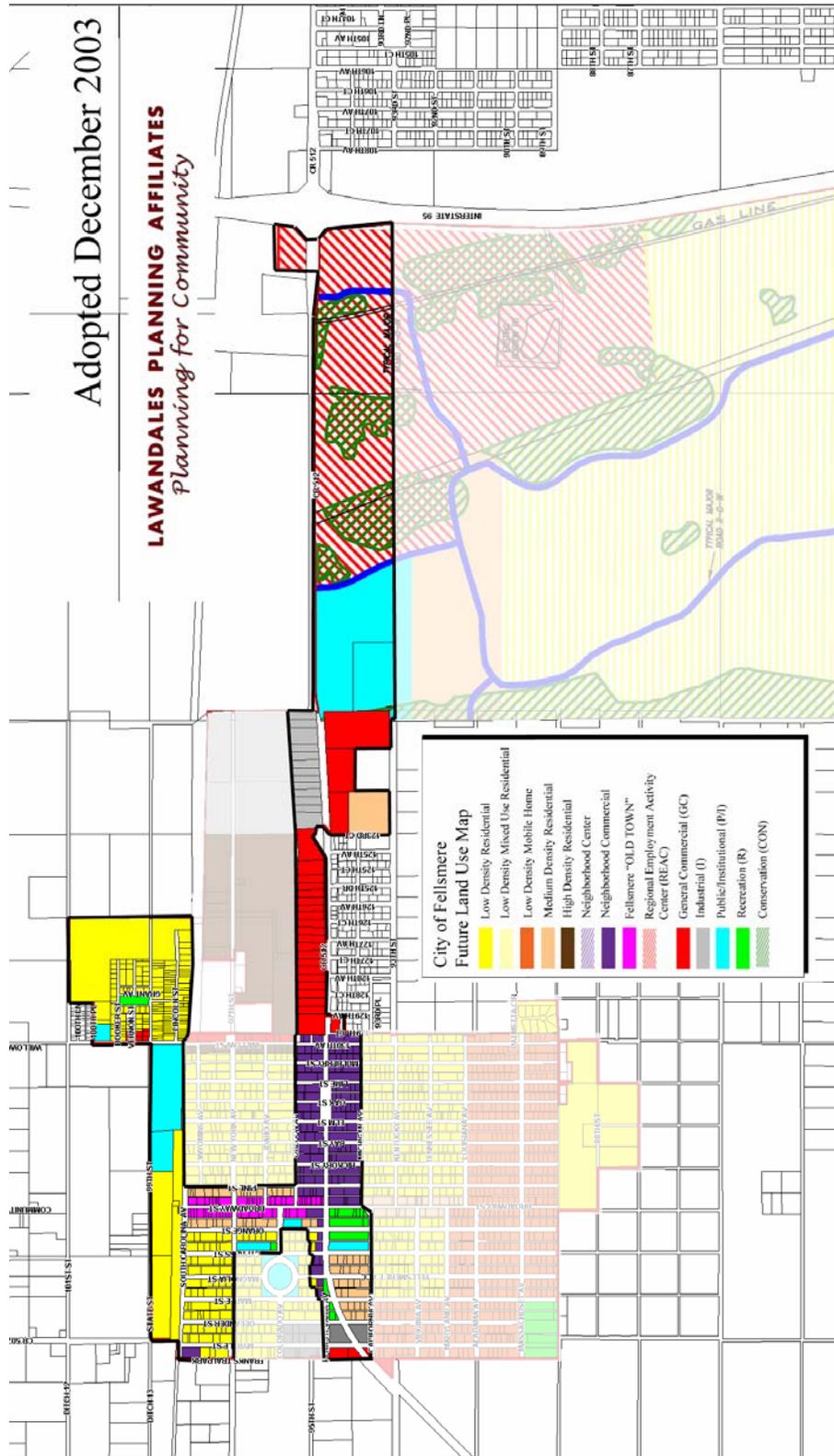
Source: LPA; July, 2005 figures were created by using Indian River County Property Appraiser Data.

Map 2 depicts the zoning in the area.

Map 2
Zoning Map



Map 3
Future Land Use Map



Sites, Building Condition and Appearance

CR 512

There is one road into Fellsmere and one road out: CR 512. At the I-95 Interchange, it is a 4-lane divided highway, tapering to a 2-lane roadway into the City and west, curving around to SR 60. While it has been a "rural collector", its classification needs to be changed to an arterial to reflect anticipated increases in traffic that will come with new development. A redevelopment program will be able to garner funding to make needed improvements for the roadway, including traffic lights, stormwater improvements, beautification, safety, pedestrian/bicycle accessibility. The Redevelopment district designation increases the City's ability to make improvements and obtain grant funding. County funding through the MPO has not been forthcoming for improvements to City roads such as CR 512, Willow and Broadway. As such, these roads lag far behind in the queue for planning and transportation funding.



Trucks barrel through the City on SR 507 (Babcock Street) through Broadway to CR 512 disrupting traffic flow, tearing up the roadway, and disturbing businesses and residents alike. A truck route, to eliminate the truck traffic from the City's downtown has been discussed for years, but no action has been taken. Alternatives include using Myrtle Street,



extending South Carolina Street to Willow, or using another of the County's east-west roads (99th, 101st, etc) as a link from Babcock to Willow Street. In addition, lack of resources leaves many of Fellsmere's roads unpaved. This is not only an eyesore, but is not conducive to business development, good drainage, or safe pedestrian movements.



Along CR 512, the area consists of Residential, Commercial and Industrial land uses and zoning. There are several properties that are vacant, some left so by the 2004 Hurricane season.



CR 512 bisects and traverses the length of the City on an east west axis. Some of the parcels on the north and south side were affected when the road was placed and changed by reduced sizes, vanquished buildings, severed lands, and small lots that are an impediment to quality development without a redevelopment district. There are a few parcels that are not of a size and configuration to produce developable lots.

A windshield survey conducted in June indicated that approximately 35% of the structures or sites were substandard or dilapidated. Approximately 20% were vacant, including a restaurant, MESA Park, a realty office, some homes, trailers, and strip centers.

According to the City's code violation records, in 2004-2005, 83 violations were reported within the CR 512 corridor. Many code violations were noted including:

- Alcohol violations
- Building violations
- Overgrown lot; junk

Many code violations were noted including:

- junk
- overgrown yards
- illegal cars/boats/vehicles
- building code violations

The scene around CR 512 varies from single family to mobile homes, to commercial, industrial and vacant land. There are several decaying structures, which are boarded or falling apart. Many of the sites have been left as overgrown trash dumps, located behind the frontage properties, creating situations that are not inviting for new investment opportunities. In addition, traffic access has altered development patterns and access management has become a problem affecting the developability of the land and the continued movement of traffic. The County's solid waste transfer station greets residents and visitors as the gateway to the City.

The CR 512 area has had little investment over the last few years. The building condition and appearance on these roads, the number of code enforcement problems, crime and other factors have deterred investors. No new investment has occurred on CR 512 since 2002, when the last new structure was built. Prior to that, one (1) building was built in 1990 and 1 in 2001. This clearly indicates an area of disinvestment and economic disadvantage. There are 298 acres of land in the BSA on CR 512. Buildings are worth less than half the land value, and the taxable value is only \$400,000 more than the land value.



The only upgrade to property on CR 512 has been at Giuseppe's Restaurant, where a newly paved parking lot, landscaping and signage enhance the appearance and attractiveness of the place and area.

While some of the buildings are in sound condition, many of the buildings and sites have been neglected, causing eyesores, potential health and environmental problems, and a general malady within the City. The pictures show broken storm-water drainage systems, outmoded solid waste handling, lack of maintenance, disconnected properties, and general lack of caring among existing property owners. The City's Code enforcement capabilities have been taxed by the amount of rising derelict properties.



Broadway, South Carolina, Myrtle, and Babcock Streets

Broadway Street suffers from stagnant or non-existent private investment, with the exception of the March Landings Restaurant and upgrades to the Feed Store. Indeed, the disinvestment of the existing lands and structures is evidenced in the photo's, which show dilapidated buildings, poorly maintained properties, large numbers of vacancies, and inconsistent land uses. The majority of the area is designated for commercial land uses, but the parcels are of a size or contain problems that are a deterrent to improvement and investment. Lack of stormwater, dirt roads, and very poor drainage also serve to deteriorate property values, keep investment options limited, and serve as a blighting factor to the area.



Broadway has seen no new buildings since 1996. The taxable value of all properties on Broadway is less than the building values. Approximately 40% of the buildings are vacant, and 20% are substandard or dilapidated. One structure, on the corner of South Carolina and Broadway was condemned and demolished in May, 2005. One other site is under condemnation on South Carolina. Code enforcement actions in this area have caused several homes to go into foreclosure, with liens being filed as high as \$12,000, due to code enforcement issues.

Only 4 new structures have been built within the entire BSA since 2000. While hundreds of residential building permits have been issued throughout the City. Fellsmere's population has been increasing; however, economic interest on Broadway Street and CR 512 corridors has been negligible. These facts are clearly represented in the photographs shown herein.

Broadway Street and CR 512 have been deteriorating from disinvestment from lot lay-outs, old plats, insufficient infrastructure, code enforcement nightmares, and deterioration of buildings and sites not seen in other areas of the City. Broadway, the heart and soul of the Fellsmere community, is worse than CR 512. Fellsmere major

corridors will continue to deteriorate without government intervention through a community redevelopment agency.

The areas between Michigan and CR 512 and between New York and South Carolina are in severe transition. Over 45% of the structures in these areas are substandard or dilapidated; contain code violations; are not built according to code standards and some could not be rebuilt to current codes. Lot lay-outs, access, zoning anomalies/non-conformities or incompatibles prevent private sector investment. Ramshackle trailers, tenement houses, industrial developments, next to residential areas inhibit good growth and redevelopment. These areas consist of the old 25' and 50' platted lots, many of which have been assembled for some type of development. Some of the structures face CR 512 and South Carolina, while some face the local side. Private sector assemblage of lands to re-orient the buildings, control the numerous access points, and re-invest in the area with a mix of uses that will introduce economic vitality can be crucial to the economic development of the City.

Age of Structures/Decay

The majority of the infrastructure, buildings and site improvements within the BSA range in age from two (2) to over one hundred (100) years old.

**TABLE 3
AGE OF STRUCTURES**

1910's	11
1920's	15
1930's	17
1940's	11
1950'S	10
1960's	35
1970's	31
1980's	32
1990's	31
2000-2002	8

Source: LPA; July, 2005 figures were created by using Indian River County Property Appraiser Data.

At this time, actual building permit data was unavailable to verify the number of homes/commercial structures permitted over the past four years. However, it is clear from Table 3, using the IRC Property Appraiser's data that few new structures have been built since the 1990's. This is a clear market indicator of economic disinvestment and the need for public intervention through a strategic redevelopment program.

Taxable Values and Market Forces

Current assessed values of the area show the lack of significant investment as they relate to the City as a whole. The total taxable value of real property from the Indian River County Property Appraiser is just over \$60 million. The total assessed value of the City is at \$69 million per the Property Appraiser. Assessed values for both the City and the BSA have risen over the last few years, due to annexations, new residential development outside the BSA, and property upgrades. It is important to note that while the City's values have risen over \$10 Million (17%) in one year, it has taken the last 5 years for the BSA's values to rise almost \$7M. According to the Finance Department records, the growth rate for the City's values have been rising 4.5% (2001), 7% (2002), 20% (2003),

and 9% (2004) for the last 4 tax years. Based upon the best available data from the IRC Property Appraiser's office and web-site, each piece of land within the BSA was cataloged. The rate of growth for the BSA has been 8% in 2002, 15% in 2003 (the result of an annexation) and only 4% in 2004. The study area's assessed value of over \$19.7 million amounts to less than 21% of the City total. Table 4 shows that the building values exceed the land values; however, the difference is shrinking as the buildings age.

**TABLE 4
ASSESSED VALUATIONS**

	Assessed	Taxable
Vacant Land only	\$4,542,420 (241 parcels)	\$ 4,349,260.00
Land with Structures	\$15,207,720 (200 parcels)	\$ 8,657,770.00
Building Value (Structures only)	\$11,997,620	
Land Value (Land only, improved and vacant)	\$7,997,800	
Total Assessed Value all properties	\$19,750,140 (441parcels)	
Total Taxable Value all properties		\$13,007,030

Source: Indian River County Property Appraiser's Office, 2005

Table 5 is indicative of the "depressed" economic conditions and disinvestment in the area. As shown in Table 5, land values have only risen just over \$3M in the last 5 years. In 2001, land values in the BSA actually decreased. Between 2002 and 2003, Land values only rose by \$1.8M and building values only rose by just over \$3M. Between 2003 and 2004, land values only increased by \$172,210 (2%), and building values only increased by \$457,122 (3%). . In 2003, the building values exceed the land values by over \$5M. For 2004 the building values only rose by \$1M, while the land values rose by over \$4M. Indeed the total value of lands within the BSA rose. The telltale characteristic of disinvestment and blight is the ratio of building to land value. In this case, the gap is closing, with land values rising faster than the building values. Once land values continue to rise disproportionately to building values, the buildings have outlived their useful, expected lifespan.

**TABLE 5
2001-2004 ASSESSED VALUE COMPARISON**

	<i>Assessed Value</i>	<i>Building Value</i>	<i>Land Value</i>
2000	\$12,614,883	\$8,204,460	\$4,809,146
2001	\$14,403,881	\$9,575,094	\$4,639,726
2002	\$15,810,350	\$10,001,940	\$6,080,870
2003	\$18,798,990	\$11,520,498	\$7,825,590
2004	\$19,750,140	\$11,977,620	\$7,997,800

Source: Indian River County Property Appraiser's Office, 2005

Most startling is the fact that the taxable value of all the lands on CR 512 (\$2.8M) proposed for the BSA is barely 5% of the total taxable value of the City. That is an extraordinary low statistic, recognizing that CR 512 is the City's major transportation corridor and contains some of the most prime properties for development. All the buildings on CR 512 amount to just over \$1.5M, or 2% of the total taxable value of the City. This is perhaps the clearest indication of the problems existing in the BSA.

For the lands just on Broadway, the taxable value (\$1.49M) is less than the building value of \$1.5M. This is inherent of the disinvestment in this area. The Building value is 13% of the total BSA building value and 2% of the

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City's taxable value. The land value is so low (\$729,810) that it amounts to only 1.2% of the total taxable value, 6% of the BSA taxable value, and 9% of the BSA land values. This is the historic downtown of the community.

Table 6 shows an evaluation of the lands within each land use category. The most telling are the low values of the commercial, residential and industrial parcels, considering their values elsewhere in the City and the County. Land values are rising across the state, and that is true for Fellsmere. However, historically, the most telling of all blighting factors is the relationship between the values of the land and buildings.

Broadway has a very large number of non-taxable properties: the IRC Fire Department, the City's Community Center, the Church; and to the rear, the Library, a park, and a municipal lot. Without new private sector investment, the remaining lands cannot continue to support and contribute to the service provisions of the City.

**TABLE 6
VALUATIONS BY LAND USE**

Use	Assessed Value	Taxable Value	Number of Parcels	Average Value
Residential	\$7,471,820	\$5,065,070	269	\$27,776.28
Commercial	\$6,434,730	\$6,434,730	113	\$56,944.51
Industrial	\$1,055,520	\$1,037,620	17	\$62,089.41
Institutional	\$2,630,580	\$0.00	19	\$138,451.57
Agricultural	\$38,850	\$38,850	4	\$9,712.50
Forest/Parks/Recreational	\$3,630.00	\$0.00	1	\$3,630.00
County Foreclosed	\$562,230	\$0.00	4	\$140,557.50
Municipal	\$1,164,400	\$42,480	10	\$116,440.00
Non-Agricultural	\$6,290.00	\$6,290.00	2	\$3,145.00
Drainage	\$381,990	\$381,990	1	\$381,990.00
Right-of-Way	\$0.00	\$0.00	1	\$0.00
Total	\$19,750,990	\$13,007,030	441	

Source: Indian River County Property Appraiser's Office

Within the HCJ area, the total assessed value is \$2,687,700 with the taxable value of \$1,585,130. Not only are the land and building conditions in peril, the area contributes less than 2% of the overall taxable value of the City. All of the streets in the area were analyzed and data is available for each. Using the top three (3) developed streets as a sample, the economic disadvantages of this area and its drain on services are crystal clear. As far as the BSA, Vernon Street's buildings are .4% of the total assessed value of the City and 2% of the total building value of the BSA. Vernon Street's total taxable value is 2% of the total taxable value of the BSA. State Street is 2% of the total BSA taxable value and Lincoln, which has a high taxable value for the area of \$486,890, amounts to 4% of the total BSA. Both of those streets combined equal 7% of the BSA taxable value, and only 1% of the City's taxable value. Table 7 provides a more detailed picture of this neighborhood.

**TABLE 7
HALL – CARTER- JAMES AREA
VALUES**

Assessed Value	Taxable Value	Land Value	Building Value	Acres
\$2,687,700	\$1,585,130	\$816,400	\$1,915,780	73.26

Source: Indian River County Property Appraiser's Office

Property Value is one of the clearest indicators of blight. At this point in time, positive intervention is needed to stop the further decline of the area. Careful monitoring should occur to take proper steps to arrest the decline and to evaluate assessed values. Presently, according to the City's data, the land values are around 66% of building values; however, the trend shows that the building values are either decreasing or not increasing like other areas of the City. Only \$3.9M separates the land from the building values. As the land values increase and the buildings values decrease, the opportunities for redevelopment strengthen. The area will be desirable when land values rise. With building values not increasing, further decay is imminent. Without City intervention through redevelopment, rehabilitation and restoration, the area will continue to decline.

Transportation Issues: Streets, Traffic and Parking

This issue is the predominate factor contributing to the blight of the area. The corridor has not been given a fair share of resources by those in control of the funding sources, whether tax support or impact fees, with the exception of FDOT intervention at the I-95 interchange for 4-laning CR 512 on the approaches. CR 512 had a 2004 average daily trip count of 8738, which is slightly higher than the 2003 AADT of 8,400 and 2002 AADT of 7,400.

The City was instrumental in securing private sector funding for a traffic light at Willow Street; however, the County indicates that one is not needed at Broadway. Broadway captures a majority of the trucks coming from South Brevard and northern Indian River County, is a by-pass from I-95, and is the connector between south Brevard County and Fellsmere. It is in South Brevard where a majority of the shopping areas are, in addition to Sebastian where most of the City's residents must go for goods and services. Tractor trailer rigs, dump trucks, construction trucks, hauling trucks, and others maneuver the curves of CR 507, South Carolina and Broadway, through the downtown. This has had a tremendously negative effect on the economy of Broadway. For several years a truck bypass on Myrtle has been discussed. This is critical for the future vitality and redevelopment of the downtown.

Conversions of land uses that once thrived on the traveling public have given way to more service or marginally surviving retailers. The hotel has died, businesses have moved, and buildings remain empty. The gridded street pattern in the center of the City lends itself well for redevelopment and improved parking and access. On-street parking is available on Broadway; however, parking will be a deterrent to future development until parcels are acquired and either the public or private sector provide off-site centralized parking facilities. Still remaining are the uncontrolled access points, lack of parking, poor signage, poor or non-existent drainage, unpaved alleys, faulty street lay-out, no curb and gutter, and other factors which cause blight. Excessive utility poles and overhead lines, archaic system of signalization, nonconforming access points, vacant property, aged buildings, and unappealing facades, together detract from potential development of the corridor.

Most of the sites along CR 512 have no sidewalk system. Few of the interior sites have a pedestrian connection to the limited commercial areas. There is no formal pedestrian connection to City's amenities, downtown, the

schools, or City Hall. One of the major benefits of the pedestrian system internal to the residential area is that it brings people out and contributes to a natural surveillance. This often leads to crime reduction. Pedestrian accessibility provides alternatives to vehicular transportation as well. On both sides of the corridor, commercial lands front the roadway and to the rear are residential and mixed-use areas.

Many of the commercial sites have parking lots which are less than adequate, particularly those older sites along the CR 512 Corridor, as well as Broadway. *Windshield surveys revealed that parking lots were deficient in one or more of the following areas:*

1. Improper location of parking stalls
2. Insufficient number of parking stalls
3. Insufficient or non-existing pavement
4. Inadequate number of handicap parking spaces as well as a deficiency in width and a lack of access aisles.
5. Lack of drainage and retention
6. If paved, it is cracked and requires resurfacing
7. Needs striping or re-striping
8. Insufficient/no curbing
9. Insufficient/no lighting
10. Insufficient/no landscaping

On-site parking and its related problem of access management, within the BSA is an element that requires considerable attention. The lack of coordination among the sites from small lots and small individual developments contributes to the overwhelming problem of access management and numerous driveways and curb cuts. The parking conditions as described have contributed to the overall blight of the area. The real or perceived lack of parking and the real or perceived accessibility problems have also caused the demise of many of the businesses on the corridor.

The Murphy Act right-of-way poses a problem for investment, accessibility, and visibility of adjacent businesses or services. The act captures additional lands from years ago that often bi-sect properties, take inordinate amounts of land from a development site, create development constraints and cause a good portion of a site to be unusable.

Pine Street and Orange Street roadways in the area are inadequate, poorly maintained, and need repair. Lack of pavement, no curb and gutter, no sidewalks, poor signage, and general conditions are problematic. The appearance and condition of these roads, which serve primarily residential areas or are feeders to the rear parking lots, detracts from the potential development of the area. Lack of curb and gutter also contributes to stormwater management problems, an issue that could be addressed through a regional stormwater management system.

Lastly, a contributor to the blighting conditions from a transportation, as well as site condition and aesthetic standpoint is the IRC Solid Waste Transfer station that sits right on CR 512. On trash days, traffic is backed up in both directions for at least ½ mile. Cars are in the right-of-way, in the ditches, in the swales. With only two lanes on CR 512 for access, friction is high with left turns to go into the dump and left turns to go out. The County and City are working together to move this site, which will aid in overall redevelopment efforts.

Law Enforcement Statistics

Another formidable, predominate blighting influence in this area is the amount of crime. Over 993 crime incidences were reported from January 2002 to May 2005. This factor alone makes the area a prime candidate for creating a Community Redevelopment Area. Crime incidents have continued to increase over time, particularly auto accidents, criminal traffic, and disturbances. The reason that crime is a critical blighting factor is that police service demands for the area burden the City's ability to provide adequate services elsewhere. It also burdens the taxpayer by causing increases in taxes to provide proper coverage and protection. As the need for police protection increases, a larger percentage of tax revenues are used to provide additional services and takes away from other services that an area could receive. High crime rates discourage investment and a vicious cycle starts: real/perceived lack of safety for personal and tangible property; new investment decreases; property values decline; tax revenues decline; no one invests; crime increases; and it starts over.

The following table identifies the enormous amount of criminal activity in the area. The main value represents the total BSA; the number in parenthesis is just for the HCJ subdivision.

**TABLE 8
CRIMES BY YEAR**

Year	Number of Crimes
2002	307 (123)
2003	283 (49)
2004	267 (89)
2005 (as of 5/27/05)	136 (33)

Source: LPA; City of Fellsmere Police Department Records

**TABLE 9
LAW ENFORCEMENT STATISTICS REPORTED IN THE PROPOSED CRA EXPANSION AREA
BETWEEN JANUARY 2002 THROUGH MAY 2005**

Incident	Number
911 Hang Up	51
Abandoned Vehicle	3
Abuse Report	1
Agency Assist	29
Aggravated Battery	5
Alarm	95
Alcohol Violation	2
Altered Tag	1
Animal Call	10
Armed Robbery	1

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Arson	1
Attached Tag not assigned	1
Attempt to locate	1
Attempted Burglary	1
Attempted Robbery	1
Auto Accident	69
Auto Burglary	1
Baker Act	2
Battery	9
Burglary	18
Carjacking	1
Child Abuse	3
Civil	18
Concealed Firearm	2
Criminal Citation	1
Criminal Mischief	24
Criminal Traffic	121
Curfew Violation	1
DAV	4
DCF	7
Disabled Vehicle	1
Disorderly Conduct	2
Disorderly Intoxication	10
Disturbance	79
Domestic Violence	9
Driving with Suspended License	1
Drug Arrest	6
DUI	22
EMS Assist	4
Exhibition of Weapon	1
Felony Drug	1
Fire	1
Flee & Eluding	3
Forgery & Loitering	1
Found Narcotics	1
Found Property	11
Fraud	6
Giving False Name	1
Grand Theft	2
Harassing Phone Call	1

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Hit & Run	1
Illegal Parking	1
Information	44
Injured Animals	1
Loads not Secured	1
Lockout	1
Loitering	1
Lost Property	1
Lost Tag	1
Lost Wallet	4
Medical	5
Miscellaneous	25
Missing Person	3
Narcotics Arrest	1
No Drivers License	7
Noise Complaint	1
Noise Disturbance	23
Obstruction	1
Open Door	12
Overdose	2
Petty Theft	1
Petty Theft/Gas Drive off	1
Physical Disturbance	1
Prowler	1
Reckless Driver	14
Resisting Arrest w/o violence	1
Retail Theft	2
Robbery	5
Runaway	3
Search	8
Seized Van	1
Sexual Battery	2
Shooting	1
Shots Fired	3
Sign on Road	1
Signal 7	1
Standby	3
Stolen Vehicle	4
Stolen Vehicle Recovered	2
Structure Fire	1

Suicide Attempt	1
Suspicious Incident	21
Suspicious Person	18
Suspicious Vehicle	14
Theft	26
Traffic	2
Traffic Arrest	20
Traffic Complaint	1
Traffic Hazard	4
Transport	2
Trespass	1
Trespass/Drug Arrest	1
Unassigned Tag	1
Unknown Problem	1
Vandalism	1
Verbal Disturbance	13
Vin Verification	1
Warrant	2
Warrant Arrest	24
TOTAL	993

Source: LPA; City of Fellsmere, Florida; Police Department, 2005

Historic Structures and Preservation

The City has a wonderful array of remaining historic structures that provide an intrinsic value to the City. However, many if not all of these structures are rapidly moving from substandard into a dilapidated conditions, making their rehabilitation and adaptive re-use not economically feasible. The land values of these parcels exceed the buildings' values, making them ripe for demolition and redevelopment. Through a redevelopment program, the City can institute measures to preserve, protect, rehabilitate, and incentives the restoration of these parcels. Some examples are shown below.



The building above was condemned and has been demolished.

In addition, many of the structures are homesites, which the City might want to consider allowing for other uses or a mix of uses therein to create feasible opportunities for redevelopment. There is a wonderful neighborhood of older bungalows located off Broadway, that could be enhanced, maintaining its residential zoning, doing streetscape improvements, including decorative lights, landscaping, sidewalks, and other amenities adding to its quaint charm, walkable nature, and historic character. It may also be an opportunity where the home is not of an historic nature, to allow for individual lot redevelopment into Townhomes, or urban type duplexes, that add enormous value increasing property values.

The old hotel would be a beautiful bed and breakfast, with sprawling verandas, outdoor eating and sitting areas, a new pool and cabana for inviting travelers to re-live the historic days of Fellsmere. Or, it could become a mixture of restaurant or retail space on the ground floor, with lofts or offices above. The options are endless, if a project can be financially feasible. Special treatment and care can be given to allow it to be adaptively re-used, without sacrificing safety. Grants are available for restorations, and if within a CRA, more points are garnered almost guaranteeing approvals.

Some of the structures are too dilapidated to keep. However, the City can adopt architectural and site design guidelines that mimic the historic flavor for use in both residential and commercial settings within the district and surrounding neighborhoods. In HCJ, there are many structures which could be rehabilitated with CDBG, CRA and other funding sources for upgrading the neighborhood. A Neighborhood Strategic Plan, built from residents' consensus how to reclaim the neighborhood would help direct programs, funding, and human resources. Habitat for Humanity is eyeing the area for new ownership opportunities. These efforts will have far reaching positive consequences on the human capital that is being lost.

Land values are beginning to outpace building values, due to age and conditions. Demolitions are already occurring. Demolition delays can aid in keeping some structures alive until other alternatives are sought if possible. If not, redevelopment of those sites becomes a natural market response. Having guidelines to direct the styles and types of replacement dwellings becomes crucial to maintaining the quality of the neighborhood.

Redevelopment Opportunities

Part II of this study will be to explore redevelopment opportunities and create a Redevelopment Plan for the Fellsmere Community Redevelopment Area. High value, quality growth has occurred north, south, and east. While Fellsmere has attracted quality, valuable single family homes and new residential subdivisions within other areas of the City, little development has occurred in the BSA despite an upsurge in residential populations. This is clearly in part because of the blighted conditions that exist in the surrounding areas for which this study is conducted.

However, the area is ripe for carefully planned, quality development and redevelopment due to several key factors, some negative and some positive:

1. Lack of new, raw land for development nearby or in such a good location, within the City's urban service area,
2. Increased demand to use and convert existing land uses to meet market trends and population demands
3. Rising land costs, often exceeding building values, which is the approaching scenario in Fellsmere
4. Aging infrastructure inadequate to support current regulatory requirements and business needs
5. Aging structures that contribute to prevalent blight and decay

6. The location of the Stick Marsh, the old historic railroad, 10,000 acres of St. Sebastian Preserve, and due east on CR 512-510, the north county Park, Sebastian River, and Indian River Lagoon, which can be wonderful sources of eco-tourism, paired with the rural nature of the community, and the enormous amount of public lands, can be a source of revenue attraction for a CRA.

While there are many blight indicators in the area, there are also several assets:

1. The existing infrastructure base of water, roadway, sewer capacity
2. The proximity to I-95, SR 60
3. The proximity to the Stick Marsh
4. The proximity to and location of historic resources and areas
5. The amount of land that can be assembled to achieve new development opportunity
6. A solid internal roadway network that can be improved

Preliminary Recommendations

The following represents initial observations and recommendations for prospective actions and projects. This list will be expanded as we move into Part II, The Plan.

1. Amend the land development codes to promote mixed-use developments within the BSA.
2. Focus/target efforts at creating a City Center:
 - a. This could include shops, restaurants, entertainment, eco-tourism centers, trail rider options, Stick Marsh promotions, fishing, historic tours, rails-to-trails etc.
 - b. New government complex, including community policing paid for through tax increment financing
 - c. Identify and consider incentives for development bonuses to capture market demands, eco-tourism opportunities, and aggregate parcels in the City Center area and on portions of CR 512, particularly if eco-tourism, public access to the St. Sebastian preserve, equestrian features, historic preservation and natural landscapes are enhanced or included.
 - d. Apply architectural and site design guidelines to promote a style or quality of new construction that would maintain the desired theme and scale of development in the City.
3. Create a system of strategic, planned improvements of publicly owned lands and right-of-ways to maximize their usefulness for the residents of the City and surrounding community, such as with trailheads, greenways, riding trails, special areas for hiking, cycling, horseback riding, and eco-tours; a pedestrian system for walking and bicycling to the City center and environs. These would be superb amenities and attractors to bring people to the area to support existing and new businesses. Using the lands that are off the tax rolls as "people generators" provides remuneration from the loss of tax revenue through sales taxes, fair-share contributions through leases, user fees, and/or rentals, such canoe, kayaks, building leases, walking tours, historic tours, educational classes, etc.
4. Provide protections for historic structures and historic neighborhoods where there are opportunities for market forces to improve and upgrade existing structures or features. Allow for smaller lots where neighborhoods can be preserved and rehabilitated.
5. Identify incentives to homeowners to improve residential facilities,
6. Research the creation of a Community Development Corporation (CDC) to act as the facilitator of public-private investments opportunities and rehabilitation of existing structures, particularly historic structures and low income affordable housing in specified areas.
7. Amend the zoning maps to remove inconsistencies and conform to logical property boundaries and work with property owners to eliminate non-conforming uses.
8. Target and strengthen code enforcement efforts to handle initial "clean-up" of the areas
9. Use Façade Grants/Loans to improve buildings, when funds are available.

10. Create a business development program to aid, expand or retain existing businesses and promote new business opportunities; consider a small business administration loan program to aid small business start-ups from the community; Create incentives for business location and retention.
11. Identify areas for infrastructure and beautification improvements, including water/wastewater, drainage, parking, traffic lights, sidewalks, landscaping, new signage
12. Improve industrial and heavy commercial opportunities for lands CR 512, where compatible with nearby residential (phasing out incompatible uses).
13. Create a system of waivers for parking, setbacks, or other elements, where owners can do site and building improvements that can upgrade existing properties and retain business.
14. Potential private project sites are prevalent throughout the area: Vacant lands; derelict properties; historic sites; and others.
15. Identify a phased streetscape program
16. Improve the gateways into the City to solidify and create Fellsmere's image/theme as you enter the City
17. Identify new parking areas, access management controls for existing locations, and other transportation solutions, including an alternative truck route along Myrtle Street to eliminate truck traffic through downtown.
18. Create a series of special events to complement the existing Frog Leg and Fellsmere Days, such as closing Broadway for a Farmers Market once per month, Friday Fests, and other events as appropriate.

The district should capitalize on its proximity to the St. John's, Sebastian and Indian River, the inherent historic character, Melbourne and Palm Bay to the north, Sebastian/Vero to the east and south, and its close proximity to the Stick Marsh, Fellsmere Farms, and Highway 60, along with other existing public and private amenities. Vacant lands could become new housing opportunities or new mixed-use projects. Reconnecting and re-invigorating the corridor with the residential, commercial, mixed-use, entertainment, would create an unbreakable connection between all land uses and populations. New housing opportunities could reach a diverse clientele. Recreating commercial opportunities downtown and BSA would bring new life, economic development, and help the restore the two aging corridors.

Conclusions and Recommendations

In my opinion, the Blight Study Area, as shown on the enclosed maps, meets the statutory requirements for establishing a Community Redevelopment Area primarily from building conditions, taxable values, lot lay-outs dating back to early plats, transportation and crime issues. This study examined the blighted conditions evident in the proposed redevelopment area, and clearly the need is established for adopting these findings of necessity and creating a strategic plan to capture a vision, address opportunities for public and private reinvestment, redevelopment and overall revitalization.

Blighted areas in general:

- ◆ Impose a costly burden on local communities in terms of service requirements;
- ◆ Cause the loss of much needed tax revenues;
- ◆ Infringe on the general health, safety and welfare of the residents within the area of deterioration; and,
- ◆ Have the effect of impairing and arresting economic growth and vitality because few will invest or reinvest in the area.

There are several key indicators that the proposed Fellsmere BSA qualifies for being designated as a community redevelopment area:

1. Steadily rising crime rates uncharacteristic of the rest of the community.
2. Transportation problems associated with impacts from projects that have left defective or inadequate lots, little access management, poor parking provisions, problems with remaining local streets and their layout

or pattern, other internal roadway issues, poor, if any pedestrian access; and no public transportation facilities.

3. Deterioration or stasis in property values.
4. Faulty lot layout in relations to size, adequacy, accessibility, or usefulness.
5. Deterioration of site or other improvements.
6. Lack of beautification, stormwater management and code enforcement issues, storage and proliferation of junk and other nuisance problems.
7. Disconnection of neighborhoods.
8. Building decay and dis-use.

Map 1 identifies LPA's recommended boundaries for the proposed District. Without the intervention of the City, through establishing a Community Redevelopment Area, the declining conditions in this area will worsen, causing further strain on the City's resources and ultimately affecting the nearby fairly stable residential neighborhoods. The City and community both recognize that sound infrastructure investments, access management, appropriate development codes and incentives for private investment, actions which stem from creating a CRA and adopting a Redevelopment Plan, will contribute to arresting blighting influences in this area.

A Community Redevelopment Program provides opportunities for the community to design a new future for the BSA and create opportunities for public and private investment, consistent with a consensus driven Redevelopment Plan. A Redevelopment Plan can provide some physical solutions to the crime problem as well. Use of Crime Prevention Through Environmental Design (CPTED) standards, new codes, programs or solutions that provide natural surveillance, crime watch programs, new lighting, expansion of community policing, re-use of existing buildings, demolition of dilapidated structures, new street patterns, and other measures can have a positive impact on reducing crime. By encouraging new public and private investment and other physical and social improvements, crime rates decrease and values increase.

In conclusion, it is my opinion that this area qualifies as a Redevelopment area. It has been my privilege to serve the City and conduct this study. I appreciate the opportunity and any assistance rendered. I look forward to your comments and questions, and the opportunity to present these findings to the staff, the Council and community as desired.

Respectfully submitted,
Lawandales Planning Affiliates

Rochelle W. Lawandales

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