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Thank you for your interest in preservation and taking the time to consider the issues associated with the recommended changes to the city's historic preservation ordinance. St. Petersburg Preservation (SPP) believes there are overwhelming reasons why the application process for historic district designation should be changed. Below is a summary of why making those changes and counting only responding owners in the voting process (eliminating non-responding owners being counted as no votes) is good public policy.

- The vote is only to determine if a district application can be submitted not to determine if a neighborhood will be designated. As such, the voting process should be simple and fair as encompassed by the recommended changes.
- The district designation process, in addition to providing for property owner vote, offers multiple and additional opportunities for owners to voice their opinions about a proposed designation, including individual notice of public hearings.
- Property owner vote is neither a legal requirement nor a requirement used by most Florida jurisdictions.
- St. Petersburg adopts neighborhood zoning without a property owner vote. Historic district designation is akin to zoning.
- The recommended change to counting responding owners will fix a broken process that has only allowed small neighborhoods to successfully submit an application. The process needs to allow all neighborhoods; large or small or with high or low owner occupancy rates to reasonably be able to submit an application.
- Assuming a non-responding owner is against application submittal doesn't make sense. There is no more reason to count a non-responding owner as a no vote rather than a yes vote. It is fair and reasonable to only count the ballots of those who vote, a process with which all are familiar.
- By mailing a ballot to each owner the city will reasonably ensure each owner receives a ballot and, thereby, have a fair opportunity to vote.

- Returning a ballot to the city is a simple task. Only counting as votes the ballots that are returned will not impose a burden upon owners who desire to voice their opinion.
- Historic district designation is good for neighborhoods. The vast majority of studies conclude that designation protects and improves property values.
- District designation provides a degree of certainty the neighborhood will retain what makes it special, resulting in increased investment in designated neighborhoods.
- The CPPC extensively examined the voting requirement for district application submittal, held numerous workshops and hearings with opportunities for public comment and recommends a simple majority of responding votes as the prerequisite for application submittal.
- There are thousands of locally designated historic districts around the country. Historic district designation is a common way of providing historic neighborhoods a tool to help them maintain their character and property values.
- Among the small minority of Florida jurisdictions requiring property owner vote, most do not require two thirds of owners to support an application. Some only require 15% support. Thus, even using a majority of responding voter count, St. Petersburg will still have one of the toughest set of district application requirements in the state.

Providing a process for historic neighborhoods that desire to review new development and potential change in their neighborhood character is important and that is what district designation provides. If you have any questions, we would be happy to provide you additional information.

Sincerely,

/s/

Peter Belmont,  
Vice-President