

# City Council Meeting

April 21, 2026

- CITY COUNCIL AGENDA ITEM : XX
- DISCUSSION OF REVISIONS TO CHAPTER 122, ARTICLE II, DIVISION 2, COMMERCIAL AND INSTITUTIONAL VEGETATION BUFFERS

DANA DETTMAR, NATURAL RESOURCES

INCORPORATED

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**City staff have been working on a number of vegetation buffer projects for commercial/institutional properties post-hurricane and surge events. Several challenges have been identified when trying to achieve buffer compliance:**

1. Lawfully existing non-conforming properties
2. Buffers with existing mature trees
3. Overhead powerlines, public utility easements, and stormwater within buffer areas
4. Cost of plants has increased significantly since Hurricane Ian

**Since Hurricane Ian there have been several changes to code language regarding vegetation buffers to assist property owners/businesses with recovery:**

**Ordinance 24-003**

- Created native plant incentive to allow reduction in required plant quantities by 15% when utilizing all native plants.
- Excluded square footage ingress-egress driveways and inter/intra connectivity paths from plant quantity calculations.
- Allowed buffer depths to be increased administratively to accommodate utilities rather. Previously, required Planning Commission approval.

**Ordinance 24-018 & 25-022**

- Allows waivers to buffer standards to be approved administratively until December 31, 2026. Previously, required Planning Commission approval.

**Consideration of potential or recommended revisions to the vegetation buffer standards contained in Chapter 122 related to commercial and institutional uses. To include the following topics:**

1. Plant quantities in front buffer
2. Land use adjacent to side & rear buffers for commercial/institutional properties
3. Buffers with existing mature trees
4. Powerlines and public utility easements within required buffer areas
5. Stormwater areas within required buffer areas
6. Phased installation of buffers
7. Compliance following natural disaster
8. Other?

Working group for the buffer revisions consisted of Natural Resources and Planning staff, Sanibel-Captiva Conservation Foundation, & Coastal Vista Design.

# 1. Plant quantities in front buffer

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**Issue:** Can we achieve the purpose of the front buffer with fewer plants?

Vegetation buffers are required “... as a means of providing a barrier to both light and sound created by such uses and for the purpose of maintaining a rural, natural environment and wildlife corridor along city streets.” (Sec. 122-47).

**Current Requirements (Section 122-49):** Types, varieties, and numbers of plants required.

Plant Category	Quantity	Diversity	Number (2000 sq ft buffer)
Large/Medium Trees	1 per 75 sq ft	6 native species	27
Small Trees/Medium Shrubs	1 per 30 sq ft	5 native species	67; 25% must be small trees
Small Shrubs/Groundcovers	1 per 25 sq ft	3 native species	80

# 1. Plant quantities in front buffer

**Recommended Revision:** Reduce the large and medium tree requirement to 1 tree per 200 sq ft

**Section 122-49(a)1-3**

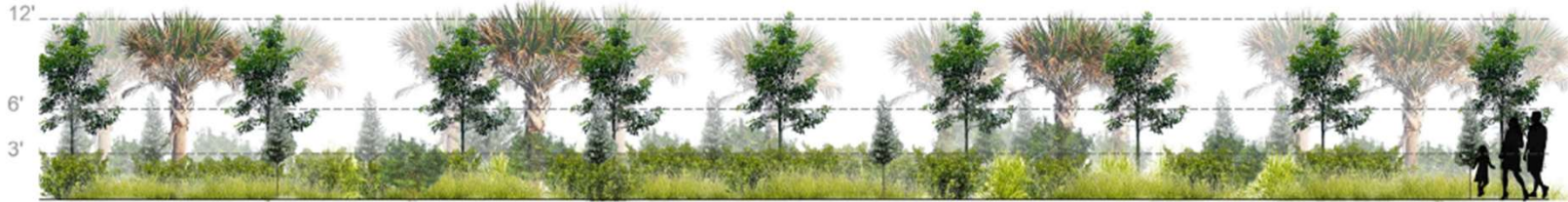
Plant Category	Quantity	Diversity	Number (2000 sq ft buffer)
Large/Medium Trees	<del>1 per 75 sq ft</del> 1 per 200 sq ft	6 native species	<del>27</del> 10
Small Trees/Medium Shrubs	1 per 30 sq ft	5 native species	67; 25% must be small trees
Small Shrubs/Groundcovers	1 per 25 sq ft	3 native species	80

**Benefits/Rationale:**

- Increase in sunlight availability to the lower canopy, increases options for plant palette
- Allows more space for tree growth, better growth form to increase resilience
- Lowers cost for property owners



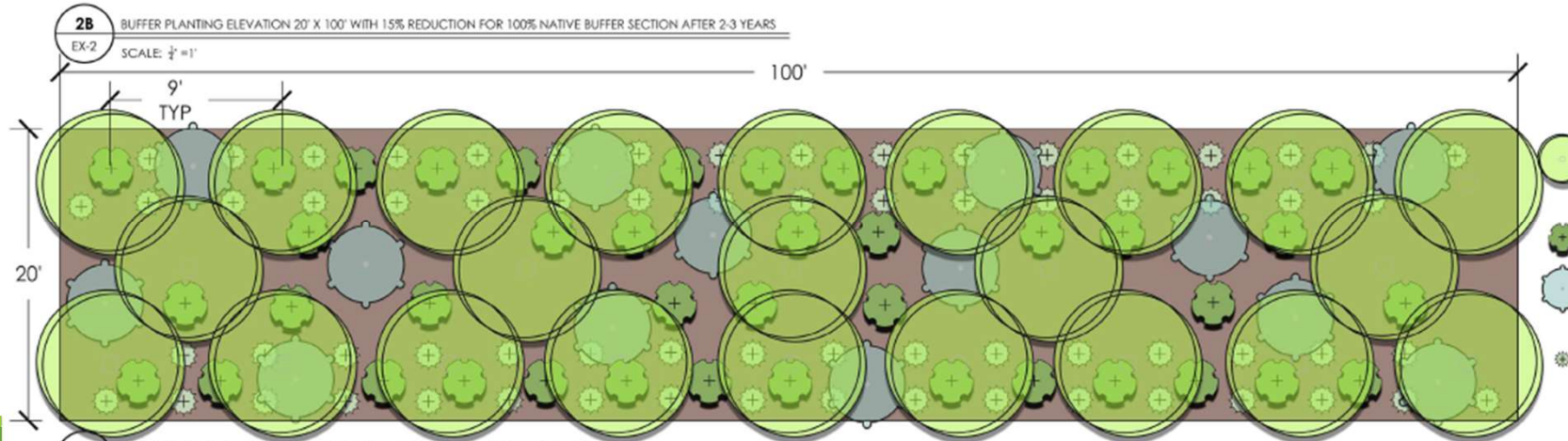
## Current standards with 15% native plant incentive



**2A** BUFFER PLANTING ELEVATION 20' X 100' WITH 15% REDUCTION FOR 100% NATIVE BUFFER SECTION AT TIME OF PLANTING  
EX-2 SCALE: 1/4" = 1'



**2B** BUFFER PLANTING ELEVATION 20' X 100' WITH 15% REDUCTION FOR 100% NATIVE BUFFER SECTION AFTER 2-3 YEARS  
EX-2 SCALE: 1/4" = 1'



**2C** BUFFER PLANTING PLAN 20' X 100' WITH 15% REDUCTION FOR 100% NATIVE BUFFER PLAN  
EX-2 SCALE: 1/4" = 1'

**PLANT MATERIAL SELECTION SAMPLE:**  
Large / Medium Tree Category - minimum of 6 Sanibel native species

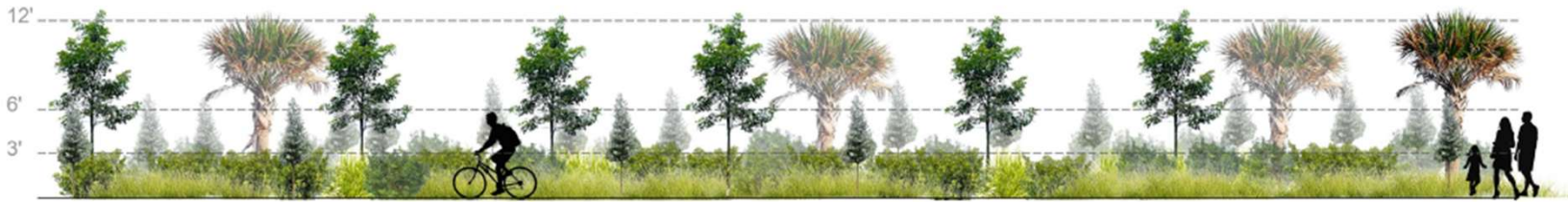
**2000 SF / 75 = 27 X .85 = 23 Large/medium Tree required** (reduction=Tree 87%)  
Sample trees: Cabbage Palm (Sabal palmetto), Green Buttonwood (Conocarpus wrightii), Gumbo Limbo (Bursera simaruba), Pitch Apple (Clusia rosea), Live Oak (Quercus virginiana)  
MIN SIZE 10'-12' HT, 2" CAL

Small Tree/Large Shrub - minimum of 6 Sanibel native species

**2000 SF - 30 = 67 X .85 = 57 Small tree/shrub Required** (reduction=shrub 25%)  
10' x 25' = 14 SMALL TREE REQUIRED  
Sample shrubs: Key Thatch Palm (Thrinax parviflora), Silver Buttonwood (Conocarpus wrightii), Dahoon Holly (Ilex cassine), Bahama Oyster (Scaevola taccada var. shapottiana), Coco Palm (Coccothrinax coarctata), Singaporea (Scaevola taccada), Florida Bay (Scaevola taccada), Myrtle (Rosmaria punctata)  
75% MIN SIZE 7 GAL, 25% MIN SIZE 4" HT

Small Shrub/Groundcover - minimum of 3 Sanibel native species

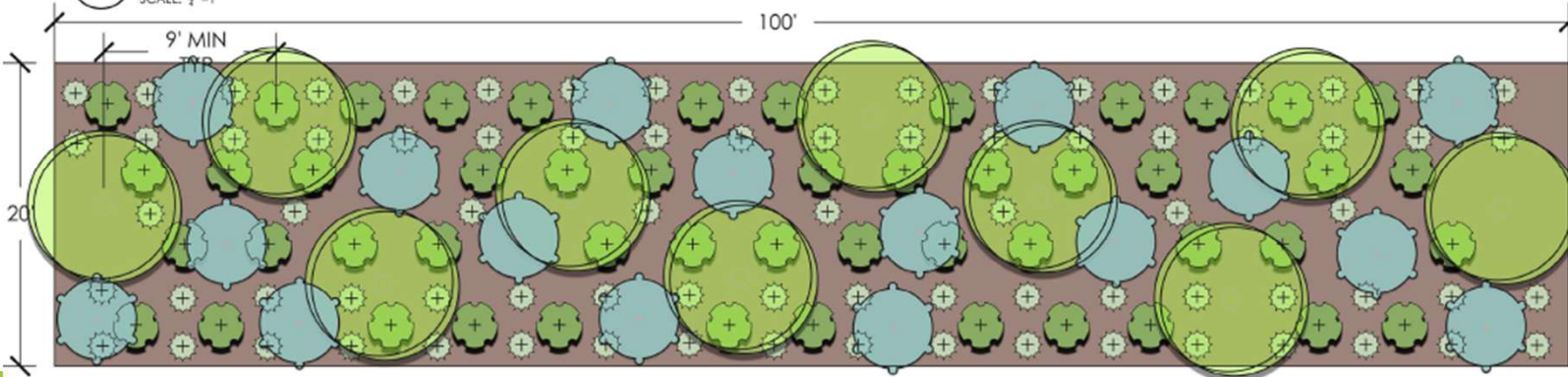
**2000 SF - 25 = 80 X .85 = 68 Small Shrub/groundcover Required** (reduction=groundcover 30%)  
Sample Groundcover: Short Leaf Wild Coffee (Psychotria ligularis), Florida Coarctate (Zinnia punctata), Spike Ivy (Pyrrosocallis latifolia), Murky Grass (Muhlenbergia capillaris), Golden Cheeper (Sporobolus spodiopogon), American Sea Purslane (Carpenteria americana), Peperomia (Peperomia elata), Quailberry (Cosopetalum bicolorum), Wild Coffee (Psychotria nervosa), Spartina (Spartina patens)



**3A** BUFFER ELEVATION 20' X 100' REDUCED LARGE TREE DENSITY (1 TREE / 200 SF) AT TIME OF PLANTING  
EX-3 SCALE: 1/4" = 1'



**3B** BUFFER ELEVATION 20' X 100' REDUCED LARGE TREE DENSITY (1 TREE / 200 SF) AFTER 2-3 YEARS  
EX-3 SCALE: 1/4" = 1'



**3C** BUFFER PLAN 20' X 100' REDUCED LARGE TREE DENSITY (1 TREE / 200 SF)  
EX-3 SCALE: 1/4" = 1'

**Proposed standards  
with reduced tree  
density (1/200 sqft)**

- PLANT MATERIAL SELECTION SAMPLE:**  
Large / Medium Tree Category - minimum of 6 Sanibel native species
- 2000 SF / 200 = 10 Large/medium Tree required**  
Sample trees: Cabbage Palm (*Sabal palmetto*), Green burtonwood (*Conocarpus erectus*), Gumbo limbo (*Bursera simarouba*), Pitch Apple (*Coussipora*), Live Oak (*Quercus virginiana*)  
MIN SIZE 10-12" HI, 2" CAL
  - Small Tree/Large Shrub - minimum of 6 Sanibel native species**  
**2000 SF / 25 = 67 Small Tree/shrub Required**  
Sample trees: Bay Branch Palm (*Phoenix montana*), Silver Burtonwood (*Conocarpus erectus* 'Silver'), Dibbon Holly (*Ilex cassina*), Bahama Cassia (*Diantha maritima* var. *chagnoni*), Coco Plum (*Chrysobalanus icaya*), Simpson Stopper / Twilberry (*Myrsine floridana*), Manilla (*Stapelia purpurata*)  
75% MIN SIZE 7 GAL, 25% MIN SIZE 4" HT
  - Small Shrub/Groundcover - minimum of 3 Sanibel Native species**  
**2000 SF / 25 = 80 Small Shrub/groundcover Required**  
Sample Groundcovers: Short leaf Wild Coffee (*Psychotria tenuifolia*), Florida Corolla (*Damia pumila*), Spider Lily (*Hymerocallis latifolia*), Murry Grass (*Andropogon scoparius*), Golden Creeper (*Borreria floridana*), American Scaevola (*Colicarpa americana*), Peperomia (*Peperomia alata*), Quailberry (*Onoseris bicolorum*), Wild Coffee (*Psychotria nervosa*), Spornia (*Sporobolus*)  
MIN SIZE 1 GAL

## 2. Adjacent land use for side & rear buffers

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**Issue:** Should the side and rear buffer standards take into consideration the adjacent land use?

1. **Another commercial property**
2. **Residential property**
3. **Conservation lands**

**Current Requirements:** Section 122-50(4) requires that a vegetation buffer between a commercial building or parking or loading area and any dwelling unit be *“sufficiently dense, between (2) feet and 6 feet above ground level, as to screen light and sound passage to the extent reasonably practical. As a minimum, all required small trees and shrubs in such portions of a buffer must be at least 6 feet in height...”* at the time of CO.

Other types of adjacent land uses are not considered.

## 2. Adjacent land use for side & rear buffers

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Side & rear commercial/institutional buffers located adjacent to:

**Another Commercial Property**

### Current Requirements

Plant Category	Quantity	Diversity	Number (2000 sq ft buffer)
Large/Medium Trees	1 per 75 sq ft	6 native species	27
Small Trees/Medium Shrubs	1 per 30 sq ft	5 native species	67; 25% small trees = 17
Small Shrubs/Groundcovers	1 per 25 sq ft	3 native species	80

## 2. Adjacent land use for side & rear buffers

Side & rear commercial/institutional buffers located adjacent to:

### Another Commercial Property

#### Recommended Revisions

- 1 large/medium tree per 300 sq ft
- Eliminate requirement that 25% of small tree/medium shrub category be small trees

#### Section 122-29(b)(1)a-c

Plant Category	Quantity	Diversity	Number (2000 sq ft buffer)
Large/Medium Trees	<del>1 per 75 sq ft</del> 1 per 300 sq ft	6 native species	<del>27</del> 7
Small Trees/Medium Shrubs	1 per 30 sq ft	5 native species	67; <del>25% small trees = 17</del>
Small Shrubs/Groundcovers	1 per 25 sq ft	3 native species	80

## 2. Adjacent land use for side & rear buffers

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Side & rear commercial/institutional buffers located adjacent to:

### **Residential property**

#### **Current Requirements**

<b>Plant Category</b>	<b>Quantity</b>	<b>Diversity</b>	<b>Number (2000 sq ft buffer)</b>
Large/Medium Trees	1 per 75 sq ft	6 native species	27
Small Trees/Medium Shrubs	1 per 30 sq ft	5 native species	67; 25% must be small trees
Small Shrubs/Groundcovers	1 per 25 sq ft	3 native species	80

## 2. Adjacent land use for side & rear buffers

Side & rear commercial/institutional buffers located adjacent to:

### Residential property

#### Recommended Revision

Keep the same standards as proposed changes to the front buffer to ensure a more robust visual/sound barrier between commercial/institutional and residential areas.

#### *Section 122-49(a)1-3*

Plant Category	Quantity	Diversity	Number (2000 sq ft buffer)
Large/Medium Trees	<del>1 per 75 sq ft</del> 1 per 200 sq ft	6 native species	<del>27</del> 10
Small Trees/Medium Shrubs	1 per 30 sq ft	5 native species	67; 25% must be small trees
Small Shrubs/Groundcovers	1 per 25 sq ft	3 native species	80

## 2. Adjacent land use for side & rear buffers

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Side & rear commercial/institutional buffers located adjacent to:

### Conservation lands

#### Current Requirements

Plant Category	Quantity	Diversity	Number (2000 sq ft buffer)
Large/Medium Trees	1 per 75 sq ft	6 native species	27
Small Trees/Medium Shrubs	1 per 30 sq ft	5 native species	67; 25% must be small trees
Small Shrubs/Groundcovers	1 per 25 sq ft	3 native species	80

## 2. Adjacent land use for side & rear buffers

Side & rear commercial/institutional buffers located adjacent to:

### Conservation lands

#### Recommended Revisions

- Require small tree/medium shrub category only to create a distinct barrier between conservation lands to discourage encroachment
- Eliminate large/medium tree and small shrub/groundcover requirements

#### *Section 122-49(b)(2)a*

Plant Category	Quantity	Diversity	Number (2000 sq ft buffer)
<del>Large/Medium Trees</del>	<del>1 per 75 sq ft</del> Remove	<del>6 native species</del>	<del>27</del> 0
Small Trees/Medium Shrubs	1 per 30 sq ft	5 native species	67; 25% must be small trees
<del>Small Shrubs/Groundcovers</del>	<del>1 per 25 sq ft</del> Remove	<del>3 native species</del>	<del>80</del> 0

# 3. Buffers with existing mature trees

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**Issue:** Existing, mature trees within a buffer can limit the available planting area, making it difficult to comply with the large/medium tree requirement for a new buffer.

**Current Requirements:** The code does not distinguish between newly installed and existing trees within buffers.

**Recommended Revision:**

## ***Section 122-49(e)***

Allow property owners to receive "credit" for existing mature large/medium size trees within a buffer based on diameter at breast height (DBH) measurements of the existing tree(s)

- DBH 6-10" = two trees
- DBH 10.1-20" = three trees
- DBH 20" or greater = four trees

### **Benefits/Rationale:**

- Recognizes the benefits of large, mature trees
- Reduces harm to existing tree roots and promotes survivability of newly installed trees
- Lowers cost for property owners

# 4. Powerlines and public utility easements within required buffer areas

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**Issue:** Overhead powerlines or underground utility easements can be present within the buffer area making it difficult to accommodate certain plant types

**Current Requirements:** Section 122-48(d) allows for buffers to be increased in size (depth) to avoid conflicts with overhead powerlines or public utility easements; however, sometimes this is not feasible.

Plant Category	Quantity	Diversity	Number (2000 sq ft buffer)
Large/Medium Trees	1 per 75 sq ft	6 native species	27
Small Trees/Medium Shrubs	1 per 30 sq ft	5 native species	67; 25% must be small trees
Small Shrubs/Groundcovers	1 per 25 sq ft	3 native species	80

# 4. Powerlines and public utility easements within required buffer areas

## Powerlines Recommended Revision

Change the quantities required for large/medium trees to small trees for the area of buffer located beneath the powerlines.

### Section 122-49(f)(1)

Plant Category	Quantity	Diversity	Number (2000 sq ft buffer)
<del>Large/Medium Trees</del> Small Trees	<del>1 per 75 sq ft</del> 1 per 200 sq ft	<del>6 native species</del> 5 native species	<del>27</del> 10
Small Trees/Medium Shrubs	1 per 30 sq ft	5 native species	67; 25% must be small trees
Small Shrubs/Groundcovers	1 per 25 sq ft	3 native species	80

### Benefits/Rationale:

- Reduces conflict with plants growing into powerlines as they mature
- Eliminates need for a variance
- Lowers cost for property owners

# 4. Powerlines and public utility easements within required buffer areas

## Public Utility Easement Recommended Revisions

- Eliminate requirements for large/medium trees and small trees/medium shrubs for the portion of the buffer within the easement. Require groundcovers only.
- Plant quantities for large/medium trees and small trees/medium shrubs will be calculated for the remaining buffer outside of the easement.

### Section 122-49(f)(2)

Plant Category	Quantity	Diversity	Number (2000 sq ft buffer)
Large/Medium Trees	1 per 75 sq ft	6 native species	27
Small Trees/Medium Shrubs	1 per 30 sq ft	5 native species	67; 25% must be small trees
Small Shrubs/Groundcovers	1 per 25 sq ft	3 native species	80

### Benefits/Rationale:

- Reduces likelihood of root systems compromising below ground utilities
- Eliminates need for a variance
- Lowers cost for property owners

# 5. Stormwater areas within required buffer areas

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**Issue:** Increasingly, stormwater areas overlap with required buffer areas. Because these areas hold water and can be subject to holding storm surge for extended periods of time, the plant palette is limited making it difficult to comply with species diversity requirements.

**Current Requirements:** Not currently addressed in the code

**Recommended Revisions:** Decrease species diversity requirements in areas where vegetation buffers overlap with designated stormwater areas.

## ***Section 122-49(f)(3)***

Species Diversity	Large/Med Trees	Small Trees/Med Shrubs	Small Shrubs/ Groundcovers
Current Requirement	6 species	5 species	3 species
Proposed Requirement	3 species	3 species	3 species

### **Benefits/Rationale:**

- Increases plant survival by following "right plant, right place"
- Limits replacement of plants that don't survive, lowering cost for property owners

## 6. Phased installation of buffers

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**Issue:** Installation can be costly, especially for new development or lawfully existing non-conforming properties with little to no existing plants within required buffer areas.

**Current Requirements:** The code does not contain any language regarding phased buffer installation, but this is often a request from property owners/applicants.

**Recommended Revision:** Mirror current buffer compliance deferment stipulation agreement language

**Section 122-50(f):** A property owner may provide a request in writing for phased installation of required vegetation buffers. The property owner must sign a Stipulation of Phased Vegetation Buffer Installation Agreement and incorporate an approved vegetation buffer plan to ensure the property owner will fully comply with the requirements of this division. Under phased installation, front buffers shall be installed first and must be completed within 12 months of permit approval. Twelve months shall be provided for each additional buffer (i.e. side and rear buffers), up to 48 months for vegetation buffer compliance along all property lines.

**Benefits/Rationale:**

- Provides property owners a longer timeline for compliance
- Allows cost of buffer installation to be spread over multiple years

# 7. Compliance following natural disaster

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**Issue:** Recent hurricanes and storm surge events have impacted buffer compliance; i.e. required quantities of plants within buffer areas

**Current Requirements:** Sec. 122-51 – Maintenance standards require buffers that fall out of compliance to be restored within 30 days of notification. The language is general and would currently apply to natural disasters.

**Recommend Revision:** Mirror language under the post natural disaster build-back standards in Sec. 126-212.

**Section 122-51(b):** Required vegetation buffers destroyed or damaged by accidental fire or other natural and disastrous force must be brought into compliance within two years of the date of destruction or damage. If the declared state of local emergency extends beyond six months, all required vegetation buffers must be reestablished within three years. If the declared state of local emergency extends beyond one year, all required buffers must be reestablished within four years. If another state of local emergency is declared during an existing reestablishment period, the more recent state of local emergency will reset the reestablishment period for buffer compliance. To the extent practicable, the first buffer to be reestablished shall be the front buffer followed by side and rear buffers.

**Benefits/Rationale:**

- Provides property owners a longer timeline for compliance

# Questions/Discussion

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1. Plant quantities in front buffer
2. Land use adjacent to side & rear buffers for commercial/institutional properties
3. Buffers with existing mature trees
4. Powerlines and public utility easements within required buffer areas
5. Stormwater areas within required buffer areas
6. Phased installation of buffers
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8. Other?