

A proposal submitted to  
the City of St. Petersburg  
involving the

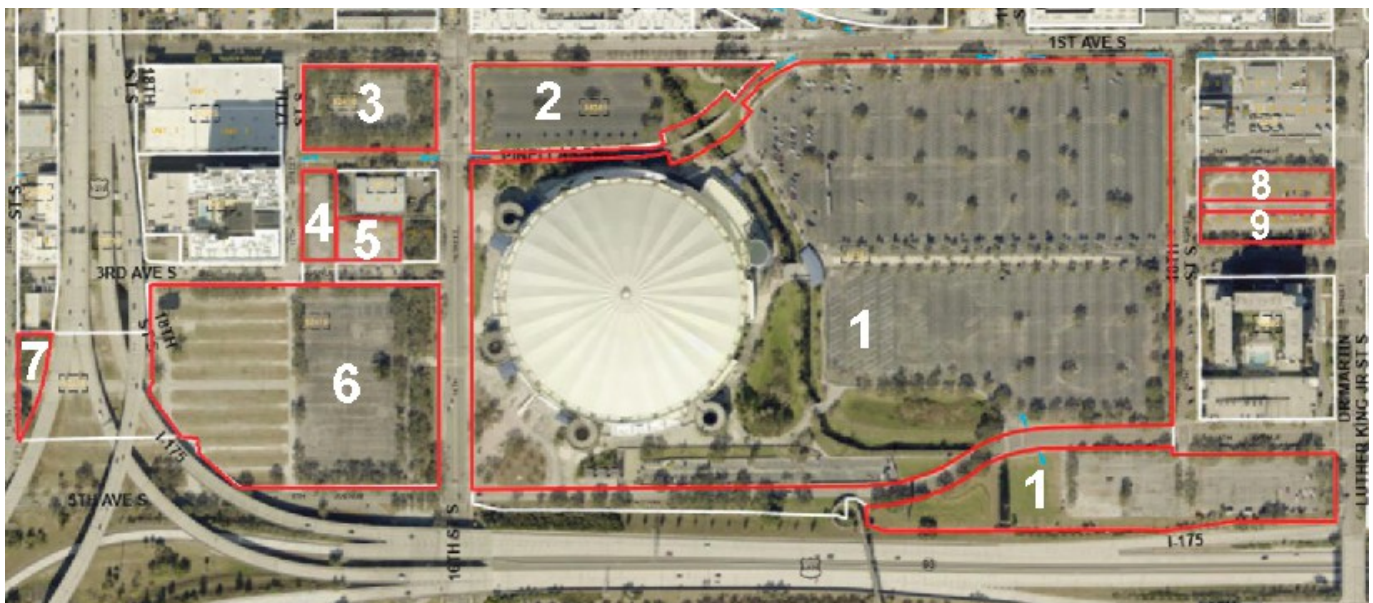
# Historic Gas Plant District

Respectfully submitted on  
February 3rd, 2026

Proposer:

Logical Sites, Inc. & Partners

Logical Sites, Inc. is a Florida Corporation that is  
100% owned by a female immigrant to the United States



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## Letter of Transmittal

To: City of St. Petersburg  
Real Estate & Property Management,  
Municipal Services Center,  
One – 4th Street North, 9th Floor  
St. Petersburg, Florida 33701

(Delivery via email to Aaron Fisch, Real Estate Director, at [aaron.fisch@stpete.org](mailto:aaron.fisch@stpete.org))

Re: Historic Gas Plant District Redevelopment ("HGPR")

Date: February 3, 2026

Dear Mr. Fisch, Mayor Welch and Members of City Council,

On behalf of Logical Sites, Inc. and its development partners, we are pleased to submit this proposal in response to the notice published by the City in the Tampa Bay Times on January 4, 2026. Said notice stated that *"notice is hereby given pursuant to F.S. 163.380 that the City of St. Petersburg is inviting any alternative proposals for undertaking the development for all or a portion of the Historic Gas Plant District property identified by"* certain enumerated Pinellas County Parcel identifier numbers. Our proposal is a response to the aforementioned notice ("Legal Notice").

The HGPR represents a once-in-a-generation opportunity, perhaps even the last opportunity, for St. Petersburg to see a portion of land so large becoming available for development in the center of the Sunshine City. We take seriously the responsibility that comes with such a momentous undertaking.

Thank you in advance for your thoughtful consideration of our proposal.

Regards,

Thomas Rask  
Authorized Corporate Officer  
Acting on behalf of Logical Sites, Inc.

# Section A — Brief Overview

On October 3, 2025, Ark Ellison Horus, LLC ("AEH") submitted an "unsolicited proposal" to the City. [That proposal](#) ultimately led to the City issuing the Legal Notice, [which can be seen on the City's website](#), and which was also published in the Tampa Bay Times on January 4, 2026. We will refer to the City's current effort that *"invit[es] any alternative proposals"* for the HGPR as "the City's Current Effort."

On page 2 of [the AEH proposal](#), a page which serves as their transmittal letter, AEH outlines its vision in summary form. Among other things, AEH cites a desire to *"create pathways to housing"* and additionally *"to elevate the City's profile as a destination for innovation, culture, and opportunity."*

Logical Sites, Inc. ("LSI") and its partners ("LSI & Partners") share that part of AEH's vision. To achieve those two goals, execution in a transparent manner, where each decision is based on merit and nothing else, and also good financial stewardship, will both be essential in order to retain public trust.

**Our proposal incorporates workforce housing, senior housing, housing for the disabled, the option for a convention center, as well as other options for the City.** However, the more these options are exercised, the number of units of housing will be reduced.

Our starting point involves **an emphasis on affordable housing**, whether that be affordable to seniors, affordable to a workforce within a certain Area Median Income ("AMI") range. And equally important: **affordable and available to intellectually and physically disabled people** who are able to benefit from the project site's prime location to more fully participate in the life of the community.

The nine parcels identified in the City's Legal Notice, collectively "the Site," all lie very close to Interstates 275 and 375. They also lie just south of the City's most important East/West corridor, consisting of 1st Avenues North & South, and Central Avenue (a.k.a. "the Central Avenue Corridor"). Multiple fixed route bus transit lines operate on these three avenues, including PSTA's Sunrunner ("SR"), PSTA's Central Avenue Trolley ("CAT") and at least four other PSTA fixed route bus lines.

The excellent roads and highways with easy on/off, adequate transit options, nearby bicycle lanes for use by both bicyclists and [micromobility device](#) users, and the prime location of the Site all add up to this: the Site provides a truly unique opportunity for the City to enhance the lives and prosperity of **ALL** residents, business owners, as well as others who arguably have a stake ("other Stakeholders") in the outcome of what eventuates on the Site.

In short, the best use of the Site is the one that maximizes just that: the [quality of life](#) and prosperity of **ALL** residents, business owners and other Stakeholders. The present proposal ("our proposal"), was developed by LSI & Partners, and is anchored in that vision of improvement for all. Our vision is that whatever rises on the Site should in turn result in a rising tide that lifts *all* ships.

Our proposal is practical, financially sound, inspirational, and responsive to the four corners provided by the Legal Notice, which makes no mention of the "23 guiding principles of development" contained in section 10 of the ["Historic Gas Plant site Request For Proposal"](#) that was issued on August 26, 2022. That fact and related issues are discussed in Section B "Legal Matters" starting on the very next page.

## Section B — Legal Matters

Regrettably, LSI & Partners can only provide an outline of its plan for the Site. In this section, we identify specific factual inconsistencies that create legal risk for the City and any selected proposer. In such an environment, putting exact plans, numbers, figures and even the name of the development principal into the public record at this point in time would be extremely unwise.

Briefly, below are some of the reasons why the City's Current Effort is unlikely to be successful unless remedial and curative steps are taken by the City.

(1) The Legal Notice gives nine (9) property parcels ("Nine Parcels") identifier numbers after stating that *"notice is hereby given pursuant to F.S. 163.380, that the CITY OF ST. PETERSBURG is inviting any alternative proposals from private redevelopers or any persons interested in providing an alternative proposal for undertaking the development for all or a portion of the Historic Gas Plant District property identified by [the] Pinellas County Parcel I.D. Numbers"* that together make up the Nine Parcels.

However, the three parcels that make up the 9.5 acre "additional boundary" identified on page 9 of the AEH proposal are not included in the Legal Notice. Therefore, proposals from proposers other than AEH are disadvantaged compared to the AEH proposal because it relies on parcels that are not available to other proposers. This difference in available parcels raises concerns about unequal treatment of the unsolicited proposal.

(2) On January 2, 2026, the City published [this communication](#) on its website, which states in part:

*Those interested in submitting a proposal and have questions can reach out to the City's Real Estate and Property Management Department at [business@stpete.org](mailto:business@stpete.org) for more information.*

Despite diligent efforts, LSI & Partners has documented that it has been unable to receive accurate answers in a timely manner from the City's Real Estate and Property Management Department.

(3) Staff provided this legally problematic answer to one of our questions:

*"As stated in the Notice of Intent to Dispose of City-Owned Real Estate, the City is inviting competing, alternative proposals from private developers and other interested parties for the lease, purchase, or development of all or a portion of the Historic Gas Plant District property."* ("Staff Response")  
[underlining added]

However, the Legal Notice simply does not invite "competing" proposals, only "alternative" proposals. Inviting "competing proposals" signals that the City intends to run a formal competitive procurement, which would require a Request For Proposal ("RFP") process. Such a process would require the City to evenhandedly treat the unsolicited proposal as just one of multiple entries in a competitive process.

(4) In late October, several local media outlets (examples [here](#) and [here](#)) reported that Mayor Welch described the AEH proposal as a "very strong proposal" that "meets a lot of the criteria that we laid out in the previous RFP (request for proposals)." But the Legal Notice makes no mention of any "criteria" that must be met, nor have any been promulgated as part of the City's Current Effort.

Words do not equal process. The City appears to be trying to avoid an RFP, yet its conduct looks like one, and that alone means the City's Current Effort is unlikely to survive bid protest(s) and/or legal review.

(5) Under the current "alternative proposals" framing in the Legal Notice, the City is essentially claiming "we're just inviting alternatives; this isn't a competition," yet the Staff Response used the word "competing," which obviously suggests a competition.

Similarly, Mayor Welch in his memo to City Council on 11/12/2025 ("the Welch Memo") wrote:

*"On October 21, 2025, the administration announced that pursuant to Florida Statute 163.380, the City will give public notice allowing an opportunity for competing or alternative proposals from private developers or other interested parties for the lease, purchase, or development of all or a portion of the Historic Gas Plant District (HGPD) property."* [underlining added].

There the word "competing" appears, just as in the Staff Response, yet no word derived from the word "compete" appears in the Legal Notice.

(6) With the mayor praising one proposal in advance ("very strong proposal"), it suggests that alternative proposals will not be meaningfully solicited, that the process may be construed as a sham because it can be argued that the City had already identified a preferred outcome. This is especially problematic when Mayor Welch himself and staff refer to "competing proposals," which implies a fair contest that could be challenged as never actually having existed.

(7) All of the above along with other facts suggest that the City's solicitation of alternatives was *post hoc*, an exercise aimed at substantiating a preferred proposal instead of meaningfully evaluating other options.

(8) In considering the prospects that the City's Current Effort will bear fruit, we also considered whether it conforms with the CRA's [Intown Redevelopment Plan](#) document ("the IRP") as amended in July 2024, conformance with the CRA's [Intown West Redevelopment Plan](#) document ("the IWRP") as amended in December 2021, and whether the IRP and/or IWRP first should be amended before proceeding with a plan for the Site. The purpose would be to avoid the kind of litigation that is often brought by third parties when substantial projects such as this one are decided.

[Florida Statute 163.880 \(1\)](#) states that a CRA may *"...sell...real property or any interest therein acquired by it for community redevelopment in a community redevelopment area... as it deems necessary or desirable to assist in preventing the development or spread of future slums or blighted areas or to otherwise carry out the purposes of this part"* [underlining added].

We have been unable to locate any official findings by showing furtherance of the goals in the above underlined text. We §119 requested records *"of any official findings by the CRA showing furtherance of the goals stated in the above underlined text"* and received none.

Based on the above facts and reasoning, and other facts, we believe that under the City's present posture, there is a non-negligible risk of costly delays for a winning proposer caused by third-party litigation. However, we may amend our opinion as additional relevant information becomes available.

(9) The foregoing eight (8) points are not the totality of our legal concerns with the City's Current Effort.

(10) The first six items above provide sufficient justification for LSI & Partners to refrain from placing exact plans, numbers, figures, or developer principal and their business associates into the public record at this time, as doing so could undermine our ability to be ultimately selected as the winning HGPR proposer.

## Section C — About Us

Logical Sites, Inc. began its operation in 2004, and its predecessor corporation began operations in 1996. Beginning in 2008, Logical Sites, Inc. ("LSI") expanded by providing unique loan arrangements for select companies and individuals all over the US, holding collateral that banks and other traditional loan providers would not accept.

Through its work over the last decade, LSI has formed business relations, partnerships and also friendships with very accomplished developers specializing in various aspects of development.

LSI's founder and now treasurer, Thomas Rask, also serves on the board of a non-profit corporation that seeks to transform the way adult autistic people live after their parents are no longer able to assist them in their daily lives. Over the years, Mr. Rask has also become acquainted with and assisted individuals with significant physical disabilities, whether congenital or acquired.

These intellectually and physically handicapped people are just that: they have a handicap, But they are not really "disabled"...not unless the community in which they live disables the life they strive for.

The developer principal and their network of associates that has partnered with LSI do not wish to come forward at this time, for the reason explained in Section B (10). However, they share Mr. Rask's passion for helping the *truly* needy in our community. These are those people who are in their present circumstance through no fault of their own, and want to live their lives as fully as possible as their friends and neighbors who have no handicaps.

The developer principal is a high net worth individual with a proven track record of real estate development in Florida. He has developed land for thousands of single-family housing units, as well as has other experience relevant to the HGPR. Our development team also includes minority-owned firms.

Mr. Rask is an immigrant from Sweden, where he graduated high school in Stockholm before moving to the US at age 18. He had previously lived in Liberia as a child, has since lived and worked in three other countries, and has traveled extensively. He is married and has two children aged 26 and 23.

The owner of LSI is Mr. Rask's wife Jennifer Rask, who is herself also an immigrant (from the UK). These facts explain the statement on the cover page that LSI is *"a Florida Corporation that is 100% owned by a female immigrant to the US."*

We are truly sorry that LSI & Partners feel it necessary to, at this time, not disclose who LSI's partners are in this project. Having said that, we are ready and willing to enter into discussion with the City.

If we are not selected, we anticipate that there will be a future and legally sufficient invitation for new proposals, an invitation which we will be happy to respond to more fully.

# Section D — Outline of Our Unique Plan

Our approach is unique for the following reasons:

(1) In addition to making room for senior living, it also makes room for intellectually and physically handicapped people. Many of them want the same things the rest of us want, and it is our view that we all have a moral duty to help make it possible for the truly needy to live as "normal" a life as possible.

(2) Our starting point is "100% affordable housing" on the Site, and with substantially more housing units than the AEH proposal provides. A park, playground(s) and making what will be a densely populated few acres walkable will of course be included in such a "100% affordable housing" base case.

(3) By providing as much workforce housing as is needed and/or possible, the city's hotels, restaurants, bars and other businesses that employ people with incomes in the AMI +/- 20% range will benefit and become more competitive. These businesses will better be able to compete for talent because of the nearby affordable housing.

Their valued employees will also have shorter commute times on average, and they can avoid downtown parking hassles if they walk, use a bicycle or a micromobility device, or take transit to work.

In summary: it's a win-win-win-win for City government, residents, employers and employees.

(4) A plan centered on affordable workforce housing also makes nearby businesses more competitive, driving further economic growth.

(5) Under our plan, the HGPR would be financed through a strategic combination of debt, equity, and public incentives, designed to ensure strong alignment between public and private interests.

(6) The City would be able to exercise various options, and here are just a few of those options that it could ask be part of any final agreement on the HGPR:

- Convention center and/or other types of venues
- Office space
- The Woodson African American Museum of Florida
- Transient lodging (in the form of e.g. hotel rooms).
- Additional park space
- Retail space

However, and quite obviously: for each such option that the City desires, fewer affordable housing units (using that term broadly) will be built.

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Thanks in advance to all for your thoughtful consideration of our proposal.