

TESTIMONY:

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Hello, I am here today to raise concerns about PLANPinellas. I am active in the League of Women Voters of North Pinellas County, Advocates for Race Amity, the budding Pinellas Conservation Coalition, and serve on the Board of the WK Preservation Group among other activities.

I carefully reviewed the entire document and will present an overview today and am leaving you a list of specific changes I believe should be in the plan before it is sent on to the state for approval. I also plan to send my recommended changes to the Pinellas County Commissioners.

Overall, there are 3 major problems with the plan.

- 1. A plan without specific measurements is not a plan, it is a vision. Without the metrics, we have no idea what the plan can actually accomplish.**

RESPONSE: A series of metrics that will assist the County in tracking the success of associated policies are in the process of being created. As these measures will relate back to specific policies, they will be finalized after the Comprehensive Plan update has been adopted, to ensure the policies are in place. When available, these metrics will be shared on the PLANPinellas website.

- 2. The word equity, is used in several places in the plan but equity, the process, is not addressed. Equity means providing the ability of all members of the county, regardless of race or income, the ability to achieve at the same level. For people who have faced years of discrimination, this means that extra efforts will need to be taken to bring them up to the standard. For example. 1/3 of current residents live in cost burdened housing, minorities at a higher rate. The plan speaks to equality going forward but has no specific measures to address past inequities.**

RESPONSE: A key factor of the update is to improve choice and access for all residents. Issues surrounding equity are built into the language of the Guiding Principles and of the goals, objectives and policies across the document. This intention is outlined in PLANPinellas' Vision (<https://plan.pinellas.gov/vision/>) chapter, which serves as the introduction to the comprehensive plan, discussing the underlying themes of the plan. Additionally, PLANPinellas calls for the creation of community planning process (FLU Objective 2.1) and will enhance the involvement of our community participation in the process of community-based planning efforts.

Addressing housing affordability and the needs of the cost-burdened is also stressed in the Housing Chapter – with the overarching Goal to provide a range of housing options for all current and anticipated future residents, with a defined objective (among others) to facilitate affordable housing for very low-, low- and moderate-income households and support efforts to eliminate homelessness. HOU Policy 1.1.3 also calls for a coordinated Countywide Housing

Strategy, working with our municipal partners, Forward Pinellas (the countywide land use and transportation agency) and others, to address affordable housing throughout the Pinellas. The County is highly committed to meeting the housing needs of our residents and is a leader in the 'Homes for Pinellas' effort (<https://www.homesforpinellas.org/>).

3. **And lastly—yes, this is our last chance--native and natural land preservation goals and objectives are lacking. The county identified several parcels four years ago--areas above 5 acres-- and still in a natural condition. Several of these parcels have since been turned over to developers or are in process. The county has only reacted when the general public has become upset with county lack of leadership. Gladys-Douglas and WK Preserve were both offered to the county for purchase before being offered to private developers, thereby jacking up the cost and making purchase more costly. The county, rich with dollars from the economic rescue plan, must purchase these lands before any more are torn up for development. PLANPinellas suggests but does not demand purchase—which it should.**

RESPONSE: Natural resource protection is stressed through PLANPinellas' guiding principles (i.e.: Sustainable Future; Healthy Communities; Protect Natural Resources). The Plan addresses land acquisition as a tool that can be used to address natural resource protection and provides criteria to consider when determining if acquisition is appropriate. Funding for acquisition is not addressed in the comprehensive plan but would be part of other County programs, such as Penny for Pinellas.

Thank you for this opportunity to speak. Please contact me if you would like more information.

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RECOMMENDED CHANGES: SPECIFIC TO PLANPinellas

1. **Future Land Use:**
 - a. **FLU Policy 1.1.4: Restricting urban sprawl should be an objective of its own—not correlated with conducting analysis and other planning efforts and should have its own policies and strategies. This is too important to be overlooked.**

RESPONSE: Pinellas County is primarily built-out and does not have large parcels of land subject to new development. This Comprehensive Plan promotes concepts that align redevelopment patterns that are counter to urban sprawl. Future Land Use Objectives and Policies (e.g. FLU 2.2; 5.1); Housing strategies associated with HOU Objective 1.1; Transportation Objectives and Policies (e.g., TRA 2.1) and others address issues about efficient use of land and focusing growth in locations that are planned around proximity of uses and where they are supported by existing infrastructure and services.

- b. **FLU Policy 1.2.2.2: “Consider regulatory opportunities” and “Consider opportunities” is so weak as to have no meaning. There is no Policy to restrict local annexations of county land which is very important to controlling what happens on county land.**

RESPONSE: Annexations are subject to State Statute requirements and outside of reviewing proposed annexations for adherence to statutory requirements, the County does not regulate annexations. The intent behind this Strategy is to provide the opportunity for the use of alternative regulatory tools to help guide redevelopment as part of community-specific, (or topic-specific [e.g., food access]), planning efforts that may have unique characteristics. This language allows for flexibility to utilize innovative approaches.

- c. **FLU Objective 2.2: “Encourage new population and employment growth in areas where existing infrastructure housing, jobs, and services are available to support (re)development.” Concern that this may result in the creation of silos along major highways of large apartment units—which we are already seeing—which will eventually be used to house low-income populations and will be susceptible to poor air quality, lack of greenspace, access to services, creating the same problems that high rises have in other urban areas.**

RESPONSE: Focusing redevelopment to accommodate growth in areas where resources and infrastructure are in place to support that growth is an important strategy for maximizing return on public investment in infrastructure, avoiding sprawl and creating neighborhoods/communities that have convenient access to jobs and other resources. This also supports transportation options, including the opportunity to support transit.

Additionally, no one policy within PLANPinellas stands on its own. Each objective/policy is coupled with the intent of other objectives and policies across the document, whether it be promoting mixed-income communities (FLU Goal 3; HOU Strategy 1.3.1.2); supporting placemaking (FLU Objective 2.3; EP Objective 1.4); or balancing the built and natural environments (FLU Goal 6).

- d. **FLU Strategy 2.3.1.2: Again, middle- and upper-income residents will live in their gated and greenway blessed communities while others will be forced to live in industrial areas. This needs to be rethought. It sounds convenient but most residents do not want to live near industrial areas. Also, employment opportunities have changed as evidenced by the population that now works from home. Most folks still want to live in a walkable, quiet community. I have never lived next to my work and my guess is that most commissioners have not either. Again, the silo effect. We need better public transportation in all sections of our county.**

RESPONSE: See response above. These approaches support walkable communities. PLANPinellas supports options for housing and lifestyle through the provision of different land use categories. Additionally, it directs the County to pursue strategies to support housing choice (HOU Goal 1 and associated objectives; FLU 3.1.2), and the support for placemaking – which centers around community identity and addressing the needs of the community.

- e. **FLU Strategy 2.3.1.5: Weak effort to provide affordable housing. This needs to be strengthened to an objective and provide for the development of affordable housing purposefully, with policies and strategies to match. This entire section is written to preserve the housing patterns we continue as a result of housing segregation laws in**

our county. Here is the place to develop affordable housing throughout the county to make it equitable. See “existing character” and “sensitive infill” which could be perceived as dog whistles for discrimination. Equity should be paramount in the county’s plan. We must make up for our past transgressions by using the Comprehensive Plan to produce real and achievable equity.

RESPONSE: This is just one strategy tied to affordable housing within PLANPinellas, and ties the need to address placemaking for communities. Affordable housing is stressed through the Future Land Use, Economic Prosperity and Housing chapters. PLANPinellas is committed to a Countywide effort to address the county’s affordable housing needs, as demonstrated through HOU Policy 1.1.3., as shared in Response #2 on Page 1.

- f. **FLU Objective 2.5: Healthy food access: admirable but not controlled by the Comp. Plan. I would add a statement of support for healthy food access but only deal with regulatory issues and support of urban agriculture.**

RESPONSE: The Comprehensive Plan supports this effort by creating the policy of wanting to achieve healthy food access and supporting the creation of food access strategic plan. The county would coordinate with partners to develop an action plan and determine how policies and/or regulations can further support this effort. Additionally, the notion of access is related to both land use and transportation policies; as specific recommendations come out of the action plan, it is important to that the established policies within the comprehensive plan support those needs.

- g. **FLU Goal 3: Excellent use of the Comp Plan to encourage the mixing of development types, the use of ADU’s, but still uses the concept of locational criteria maintaining low income in specific areas rather than providing access to any community, reinforcing the silo-ing of low income.**

RESPONSE: PLANPinellas, including this Goal, supports mixed-income communities and the policies should be enacted with that intent in mind. The intent of the locational criteria associated with Strategy 3.1.3.1, which also calls for affordable housing to be part of mixed-income neighborhoods, is to provide proximate access to services, such as transit and job opportunities. Housing becomes more affordable by lowering commuting costs and the need for reliance on a vehicle to get to daily conveniences.

- h. **FLU Support “economic development” through the use of affordable housing? Cart before the horse? Also seen in FLU Policy 4.3**

RESPONSE: Throughout PLANPinellas the relationship across topics is recognized, so decisions made in one area are considering influences and impacts by others. Having housing that is affordable to the potential work force is one component to attracting business and supporting economic development.

- i. **FLU 3.1.6.3 Strategy: Penny for Pinellas is one mechanism for affordable housing but should not be identified as the only mechanism. The county budget should also include affordable housing.**

RESPONSE: There are multiple resources to address affordable housing and the Comprehensive Plan would not provide an exhaustive list as the specific funding sources can change. The intent of the strategy is to ensure that Penny for Pinellas is used as a mechanism to support this need.

- j. **FLU 5: Sustainable transportation infrastructure: Once again the focus is on the Mixed-use corridors, which by definition will be hubs for public transportation and be pedestrian friendly and follow safe streets—excellent but we should be enhancing public transportation for all parts of the county so people are not limited in where they can live.**

RESPONSE: The messaging across the Transportation section addresses the need to consider multimodal options. Just to note two examples, TRA Policy 1.2.2 identifies an approach that is context-sensitive and considers the modal needs of the area being planned for, including transit needs. Policy 1.1.4 calls for the prioritization of public transit to assist in the development of an equitable transit system. Part of the County’s collaborative approach with PSTA and Forward Pinellas is to understand where gaps in service exist to help inform decisions around investment in infrastructure, while also understanding the need to maximize the benefit of that investment .

- k. **FLU Strategy 5.2.2.3: Landscaping and shade trees should be promoted throughout the county not just transit stops. (See natural section)**

RESPONSE: The County has landscaping programs and design standards that determine the appropriate landscaping and tree types for different locations. This Policy directly relates to transit stops and encourages the use of shade trees, recognizing their contribution to passenger comfort and use of transit stops. As addressed in the Natural Resource and Conservation Chapter, one strategy calls for the creation of an Urban Forestry Master Plan which would provide additional recommendations for appropriate locations to expand canopy coverage throughout the County.

- l. **FLU Strategy 5.3.2.3: Preferred land use strategy of 0-5 units per acre on Scenic Non-Commercial Corridors is not strong enough language here.**

RESPONSE: Intent is to limit residential along these corridors but want to retain flexibility to address unique situations.

RESPONSE: It is the intent of Policy 5.3.2 and the associated strategies to protect the scenic qualities and limit residential development along these corridors while retaining the flexibility to address unique situation. Strategy 5.3.2.3 identifies a preferred residential density and Strategy 5.3.2.3 identifies some criteria when non-residential may be allowed. The majority of unincorporated acreage along these corridors is designated with residential future land use categories that allow for 0-5 units per acre. Amendments can be considered but they will need to be consistent with PLANPinellas and the Countywide Rules, where applicable.

- m. **FLU Goal 6: Balanced relationship is not sufficient. At 98% built out, the relationship is very unbalanced and needs to be reassessed. The future of our children depends on the county preserving what little natural land, trees and clean water are left. The county uprooted the balance years ago. The strategies are excellent if they cannot be changed by annexation. I would like to see stronger protection for native flora and fauna and the encouragement of maintenance of existing tree life.**

RESPONSE: As Pinellas County takes a redevelopment focus in addressing the needs of the County as it continues to grow, the policies reflect the need to understand and balance both the built and natural environments. There are additional policies to protect environmental resources and habitats in other chapters including the Natural Resource and Conservation chapter. As the County makes land use decisions, there are policies across the chapters that will be considered.

- n. **FLU Goal 7: There should be an objective to preserve natural spaces in the land use pattern. Decisions to amend this Goal should also consider the natural importance of preserving what little open space we have left.**

RESPONSE: FLU Goal 6 recognizes the relationship between the built environment and natural protection issues and works with other policies outlined in other chapters, including Natural Resources and Conservation Management and Recreation, Open Space and Culture. Future Land Use Categories are made available to protect open space and environmentally sensitive lands (e.g., Recreation/Open Space, and Preservation.) Goal 7 directly relates to infrastructure planning and development.

- o. **Overall: there is no discussion of the potential negative impacts on some communities of “gentrification” potential.**

RESPONSE: PLANPinellas incorporates policies in the Economic Prosperity chapter to reduce involuntary displacement of residents and businesses, and promotes investment in vulnerable areas, and to ‘mitigate anticipated impacts to residents and businesses.’ (EP Policy 1.7.3). The Comprehensive Plan as a whole supports an effort to develop and preserve affordable housing across the County, (e.g.; planning towards mixed-income communities; encouraging the expansion of transit; looking at funding mechanisms; etc.) (Please also see related Response 2.g on Page 7.)

2. Economic Prosperity:

- a. **EP Goal 1: States that the goal is to “ensure Equity and economic prosperity for its residents and businesses.” The strategies, while mentioning economic equity, do not address any attempt to make up for past inequities. To offer all the same opportunity, which these do, is not the same as providing equity.**

RESPONSE: As the County moves forward with implementing this Plan, the intent to find ways to provide citizens with the resources and amenities addressed in the Plan in an equitable way. To do this, it will be important to understand the specific needs of the community at the neighborhood level and involve stakeholders in the process of planning.

- b. **EP Strategy 1.1.2.1. states that public programs should be measured to understand and address equity impacts—but does not require that they have a strategy to resolve past inequities.**

RESPONSE: See previous response.

- c. **EP Objective 1.3: again, relates to corridors to provide siting for these corridors—again concerned about the silo effect.**

RESPONSE: See response to 1.c, above.

- d. **EP Policy 1.3.3: concerns about gentrification and destruction of viable neighborhoods with redevelopment without safeguards.**

RESPONSE: See response to 1.o, above.

- e. **EP Policy 1.3.4.1: Jobs to housing ratio? For siting industry? Sounds like the old work farms?**

RESPONSE: A jobs to housing ratio provides one tool to gauge if there are job opportunities for the local workforce, or conversely if there is enough housing for the workforce generated by available jobs. Types of jobs, among other factors, are addressed through market trends and efforts made by the County to attract employers.

- f. **EP Objective 1.6: Again, gentrification protections need to be included.**

RESPONSE: See response to 1.o, above.

- g. **EP Objective 1.7: “Reduce involuntary displacement of residents...” Does not refer to gentrification at all? Should be protect neighborhood ripe for gentrification.**

RESPONSE: Gentrification is the process of involuntary dislocation of businesses and residents primarily due to market forces. Although we do not use the term gentrification, this Objective and associated policies are intended to mitigate its impacts. These policies direct the County to address this involuntary displacement and aligns policies to ‘advance a comprehensive approach’ and evaluate projects and regulatory changes that may contribute to displacement and mitigate anticipated impacts.

- h. **EP Policy 1.8.5: Support housing programs that meet the needs of the service industry? Near hotels, not sure what is meant. What would these look like?**

RESPONSE: While the County could consider different approaches to address this Policy, the intent is to ensure that the service industry workforce has viable (i.e., workers can safely and efficiently access their jobs) housing options. This section of the workforce would be captured as part of the overall effort to provide housing to meet the income-levels predominant in the service industry. Understanding where those industries exist

geographically, availability housing affordability in proximity to where those jobs exist within the County.

3. Housing

- a. **HOU Policy 1.1.2: "Ensure freedom of Choice...for all" would be a good place to discuss equity—but it does not appear here. Choice is limited by income---perhaps some additional funding to resolve past inequities such as red-lining and specific ordinances that limited where the Black population could live.**

RESPONSE: The use of the term 'for all' calls for an equitable approach to implementation. Please also see Response #2 on Page 1.

- b. **HOU Strategy: 1.1.2.1 "Maintain and enforce Fair Housing Ordinance" has appeared in every public housing plan for years yet is rarely followed—need stronger language here.**

RESPONSE: The County is committed to implementation the Florida Fair Housing Act's building and housing program and enforces Chapter 70, Division 3 Housing and Public Accommodations of the County Code and will be part of future programs that come out of the Countywide Housing Strategy.

- c. **HOU Strategy 1.2.1.2.: How about the development of manufactured homes, which is not listed here? Low-income condos?**

RESPONSE: HOU Strategy 1.2.1.2 specifically addresses support for the preservation and redevelopment of manufactured homes communities. All buildings, whether low-income or otherwise, would have to meet applicable Federal, State, and local building standards.

- d. **HOU Strategy 1.3.1.1: "Encourage" has not worked. Pinellas County should require a certain number of units designated for lower income in any approved project.**

RESPONSE: Identifying this type of requirement is a regulatory tool and would not be identified in the Comprehensive Plan. The specific details of this type of requirement would be carried out through the Land Development Code. The County is working with the Affordable Housing Advisory Committee to review the existing Affordable Housing Development regulations to update the current regulations and incentives. Recommendations will be brought back to the BCC for discussion and consideration.

- e. **HOU Strategy 1.3.1.6: Housing for low income and special needs populations. Suggest we look into SROs as a possibility with supportive services.**

RESPONSE: SROs are a potential part of the solution. While the Comprehensive Plan would not provide an exhaustive list of unit types, SROs can be looked at as an implementation method.

- f. **HOU Policy 1.3.2: Prioritize affordable housing in concentrations of employment, accessible to public transportation and accessible to range of services is making**

assumptions about the nature of poverty and contributing to the warehousing of low-income populations in central areas.

RESPONSE: See response 1.c, above.

- g. HOU Policy 1.4.2: “Allow?” housing for special needs populations in residential neighborhoods should read “encourage countywide”. What is a residential neighborhood? Do those with apartment buildings located near employment and public transportation qualify? This reinforces the notion that some people deserve to live in residential neighborhoods with certain protections while other are encouraged to live in silos, near industry and one major traffic routes.**

RESPONSE: The intent of this Policy is to have these uses be allowable residential uses from a zoning perspective. So anywhere residential uses are an allowable use, there would be an allowance for (often multiunit) special living needs housing. Currently, our Code allows for community residential homes in most residential areas based on the number of residents.

4. Transportation

- a. Overall—limit development, especially on failed roads, and therefore limit population to current capabilities. Increase public transportation countywide to reduce auto usage.**

RESPONSE: PLANPinellas strongly aims to advance a multimodal transportation network to promote options in how people move through the county and mass transit is a key component of the system. Increased density to accommodate growth in focused areas supports potential expansion the transit system both in transit routes and frequency of service, by PSTA and other agencies.

- b. TRA Strategy:1.1.3.1: “address transportation inequity” I assume means to low income and not to middle and upper incomes who rely on private transportation. But it should be addressed to non-users of public transportation as well. This section appears to refer to disability and not income inequity which should be included.**

RESPONSE: Addressing transportation inequity means to bring service/facilities to those who are underserved. This will mean investment in infrastructure and service expansion. Transit, being one piece of that puzzle, is expanded in areas where there is a demonstrated need. As noted in the Response above, there needs to be a density of population to be able to support an increase in transit routes and/or frequency of service.

As the County pursues strategies to create more affordable housing throughout the County, create mixed-income communities, develop activity centers and mixed-use corridors (as supported by PLANPinellas) the expansion of transit and other means of non-auto transportation is also supported. This strategy works along with the implementation of other related strategies across the other chapters of the document to ensure the infrastructure is in place to support the growth and meet the needs of all the users of the community.

- c. **TRA Strategy 1.1.5.2: Be forward thinking and look at combining public school transportation with general public transportation into one system. This would bring public transportation to more parts of the county, offer a means for parents to engage the school and allow student participation in all special specialty schools throughout the county.**

RESPONSE: Both the Pinellas Suncoast Transportation Authority (PSTA) and the School Board are the decision-making authorities as it relates to public transit and school transportation. The role of the County is to collaborate with these organizations and support transportation options through investment in infrastructure (sidewalks; bike lanes, bus lanes, etc.) to accommodate the community's needs. Strategy TRA 1.1.5.2, along with other policies across PLANPinellas, supports this collaboration and investment.

The County has signed the Safe Streets Pinellas resolution to work collaboratively to create a transportation system that is safe for everyone, as supported by TRA Goal 1 and the associated Objectives and Policies.

- d. **TRA 1.1.8.3: add past equity issues here.**

RESPONSE: See response 2 on Page 1.

- e. **TRA Goal 2: 'support efficient land use patterns' which are the result of inequities developed over the years. Equity goals need to be asserted here.**

RESPONSE: See response 2 on Page 1.

- f. **TRA Policy 3.1.1: add the equity issue of past transportation decisions, such as I275, which needs to be changed.**

RESPONSE: See response 2 on Page 1.

5. Natural Resources

- a. **NRC Strategy 1.1.1.1: Change "encourage and incentivize" to require especially as relates to the mature and native tree canopy. Trees act as our lungs for the county and we can no longer allow them to be torn up.**

RESPONSE: Different situations have unique circumstances and issues and the use of encourage and incentivize allows the County to determine in which situations 'requires' is supported and when some level of flexibility should be applied. NRC Objective 1.3 and associated policy and strategies seek to protect and enhance the County's urban and natural tree canopy.

- b. **NRC Strategy 1.1.2.3: Add all new development should support an aggressive tree canopy for energy efficiency and climate control.**

RESPONSE: NRC Strategy 1.3.1.3 calls for the creation of an Urban Tree Master Plan to identify recommendations for preserving and enhancing the County’s tree canopy to address a range of environmental issues.

- c. **NRC Objective 1.2 is excellent to “protect, restore, enhance ad manage environmental lands and resourced-based parts in perpetuity.”**

RESPONSE: Noted.

- d. **NRC Policy 1.2.2 should be stronger in stating that the county should purchase these lands to avoid their redevelopment rather than just be the land manager.**

RESPONSE: The Plan addresses land acquisition as a tool that can be used to address natural resource protection and provides criteria to consider when determining if acquisition is appropriate. Funding for acquisition is not addressed in the comprehensive plan but would be part of other County programs, such as Penny for Pinellas.

- e. **Unfortunately, there is not time to wait for others to lead the way to purchase. The lands have already been identified. The county should ensure these lands are saved.**

RESPONSE: See Response 5.d, above.

- f. **NRC Strategy 1.2.2.1: Equitably distribute environmental lands and resource-based parks—based on new acquisitions or prior inequitable distribution?**

RESPONSE: As noted on Page 6, as the County moves forward with implementing this Plan, the intent to find ways to provide citizens with the resources and amenities addressed in the Plan in an equitable way. As different approaches are implemented, whether it be requirements of new development or prioritizing land acquisition, equitable access will be a factor in the decision-making process. This statement under NRC Strategy 1.2.2.1 - ‘equitably distribute environmental lands and resource-based parks throughout the County’ – is one of the criteria when prioritizing land acquisition.

- g. **NRC Objective 1.2: “Protect and enhance the urban and natural tree canopy” should also follow if the land is annexed by a city within the county. Also, the planting of non-native trees should not be allowed to replace native trees.**

RESPONSE: Annexed land would be required to follow the regulations of the annexing jurisdiction. NRC Strategy 1.1.1.1 encourages the retention of a native urban tree canopy and of trees removed for development. While natives are preferred and encouraged, there are times when non-natives may be the only alternative in some highly urbanized locations. In other situations, the availability of native species can be a limiting factor.

- h. **NRC 1.3.1.3: Master plan for post-disaster tree canopy restoration needs to include plan for current restoration of tree canopy.**

RESPONSE: The Urban Forestry Master Plan would address the County’s restoration policies. This Strategy is identifying that it should include a post-disaster restoration component.

i. NRC Strategy 1.5.1.5 is excellent.

RESPONSE: Noted.

j. NRC Strategy 3.1.1.3: Need strong language that this is past and that in the future county lands will not be allowed to substitute a recovery plan in order to develop a property as shown in NRC Strategy 3.1.4.1.

RESPONSE: The intent of Strategy 3.1.4.1 is to ensure that regulatory standards limit environmental impacts from development. Strategy 3.1.1.3 aims to address impacts that may have already occurred.

k. NRC Strategy 3.1.2. should apply to all new and restoration development.

RESPONSE: This Strategy identifies that County projects should be included in these protection measures. Non-County development remains subject to the protection policies through this Chapter.

l. NRC Strategy 3.1.4.2: Statement is weak and rather than “evaluate” it should read “ensure buffers”, “ensure the continued development of the ecological greenway system”.

RESPONSE: This Strategy recognizes that there may be more than one appropriate tool to protect the natural environment. The intent is not to commit to one solution but provide flexibility while still protecting our natural resources.

m. NRC Policy 4.1.3: Add a strategy to map air quality issues throughout the county and distribute to residents annually.

RESPONSE: There are several existing resources that are available to the public that provide air quality information, including:

- [Pinellas County Air Monitoring | Florida Department of Environmental Protection](https://floridadep.gov/air/air-monitoring/content/pinellas-county-air-monitoring)
(<https://floridadep.gov/air/air-monitoring/content/pinellas-county-air-monitoring>)
- [Air Resource Management System \(ARMS\) Facilities | Air Resource Management System \(ARMS\) Facilities | Florida Department of Environmental Protection Geospatial Open Data \(state.fl.us\)](https://geodata.dep.state.fl.us/datasets/FDEP::air-resource-management-system-arms-facilities/explore?location=27.920563%2C-82.588037%2C10.66)
(<https://geodata.dep.state.fl.us/datasets/FDEP::air-resource-management-system-arms-facilities/explore?location=27.920563%2C-82.588037%2C10.66>)
- [AirData Air Quality Monitors \(arcgis.com\)](https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=5f239fd3e72f424f98ef3d5def547eb5&extent=-146.2334,13.1913,-46.3896,56.5319)
(<https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=5f239fd3e72f424f98ef3d5def547eb5&extent=-146.2334,13.1913,-46.3896,56.5319>)

- n. **NRC Policy 4.2.1: Consider a strategy of charging for single use auto travel when sufficient public transportation options are available.**

RESPONSE: The issue is complex and a much longer-term possibility for County-level roadways. Efforts to expand public transportation as a viable alternative is priority for the County and in PLANPinellas.

- 6. **Coastal Management: CM Policy 2.1.3 is excellent but may be inconsistent with earlier policies.**

- a. **Excellent policies on flood control issues.**

RESPONSE: Staff has not identified any inconsistency in policies. CM Policy 2.1.3 addresses density and does not allow for an increase in density within the Coastal Storm Area (above that allowed within the subject Future Land Use Category up to 5.0 dwelling units per gross acre). It works in conjunction with other policies that may further limit development on a specific property.

- 7. **Surface Water Management:**

- a. **Good: Restricting development on areas known to flood, discouraging density in these areas and protecting flood plains from development is all good.**

RESPONSE: Noted.

- 8. **Recreation, Open Space and Culture**

- a. **ROS Policy 1.1.1.: Rather than establish, “protect open spaces and retention of scenic vistas.”**

RESPONSE: The Objective defines the need to protect these resources. The Policy establishes the direction to establish regulations in order to achieve that protection.

- b. **ROS Strategy 1.1.1.3: Rather than address the need, “develop standards and procedures to retain recreation/opens space land use designations...”**

RESPONSE: There is an analysis process that must occur to further understand what the appropriate criteria and standards should be, including the need for incentives. Utilizing 'address the need' supports this consideration.

- c. **ROS Policy 1.1.4: Good” Pursue the acquisition and management of environmental lands, resource-based park lands and open space.”**

RESPONSE: Noted.

- d. **ROS Objective 2.1: remove the word “balance” as that can be defined in many different ways: by cost allotment, by region of the county. Heritage sites should not be balanced off against recreational sites and ecological sites...all are important.**

RESPONSE: The term 'balance' will be revised to say 'complement'.

- e. **ROS Strategy 2.1.1.1: Plan must include climate change impact on Gulf areas and resulting decrease in park and environmental lands. Why 14 acres per 1,000 residents? Why not 20 acres? Rationale?**

RESPONSE: Understanding climate and sea level rise impacts is part of the County's on-going efforts, including vulnerability assessments and the Sustainability and Resiliency Action Plan, as supported by PLANPinellas. The park and environmental lands Level of Service (LOS) was established as part of past County analysis efforts related to the Park Master Plan. Changes to the LOS could be considered as future efforts are undertaken to update the Parks Master Plan or related efforts.

- f. **ROS Policy 2.1.3: Excellent greenways, blueways and trails master plan**

RESPONSE: Noted

- g. **ROS Strategy 2.1.4.: "Maintain and enhance equitable access" How is this determined? Is the Parks and Conservation Advisory Board able to determine this? How will you ensure adequate representation?**

RESPONSE: Addressing equitable access means to identify where there may be gaps in access to these resources currently and to address those needs as part of the decision-making process. This process is a balancing act exacerbated by the challenges of working within a built-out county.

- h. **ROS Policy 3.1.2: "Acquire beach access sites that enhance equitable public access" Cost and transportation are limiting factors but are not addressed.**

RESPONSE: Decisions associated with implementing policies will always have to weigh a number of factors, such as community need, investment needs, and availability of funding and other resources. While there may be many locations across the County that could be identified as appropriate for acquisition, scheduling/prioritization of these properties would happen over time.

- i. **ROS Goal 4: "Preserve history through Protection of Special Places and Resources". This goal assumes concern for the history of BIPOC but does not state it. Heritage Village, for example, shows very little history of Black, Hispanic and early Native American populations. Even the cemeteries have been lost.**

RESPONSE: Pinellas County endeavors to document, recognize, and preserve the history and related resources of those who lived here before us. The history of BIPOC, along with other ethnic and cultural groups in the County, have contributed significantly to our collective story. Pinellas County is actively seeking to incorporate the historical storyline of groups that have been overlooked in the past. Several existing County programs and facilities currently demonstrate a commitment to the telling of these storylines and the preservation of associated resources. The Pinellas County Planning Division is preparing a GIS archaeological overlay that will include all documented

African-American cemeteries and burial grounds for indigenous peoples in Pinellas County to be used as a planning and preservation tool for the County and its municipalities.

9. Potable Water, Wastewater and Reuse

- a. **PWWW Objective 1.3: 1.1.: Consider a base rate for all based on family size or occupancy at lower rate and charge heavy users a much higher rate over this base to discourage excessive water usage.**

RESPONSE: There are several factors used to determine water rates. The County's current metering infrastructure presents challenges to consider a tiered rate structure. However, the County is working towards upgrading meters to an advanced metering platform which could provide the opportunity to explore this approach. PW Strategies 1.3.1.1 and 1.3.1.3 identify the need to consult national best practices, Tampa Bay Water's unitary rate, and area competitive rates, with consideration of sound fiscal policy. PW Strategy 1.1.4.2 calls for educational efforts to promote potable water conservation.

10. Solid Waste

- a. **Consider composting centers**

RESPONSE: The County continues to consider additional strategies to support sustainably and resiliency efforts and could address composting in the future.

11. Lifelong Learning

- a. **LL Strategy 1.2.1.1 Include equity issues in siting**

RESPONSE: This item will be added accordingly to read as:

- Equitable access for underserved populations in accordance with LL Goal 2

- b. **LL Policy 2.11: Include child care**

RESPONSE: Policy 2.1.1 identifies the at-risk communities. Consideration and identification of childcare as one of the areas of investment would be a programmatic decision.

12. Governance

- a. **GOV Policy 2.2.1 Must include equitable**

RESPONSE: This Policy is reflective of and must be consistent with State Statute language as per §163.3177(1).

- b. **GOV Policy 3.1.2 Must include equity issues in capital improvement goals.**

- c. **GOV Policy 3-4-11: Include equity in this statement.**

- d. **GOV Policy 3/4/12: Include equitable and historic equity.**

RESPONSE: The intent of 'equity' runs through the Plan, in line with the Guiding Principles, and the objectives and policies throughout the Plan as it relates to investment and meeting our residents', business's and workforce needs.

- e. **GOV Policy 3.5.1: Includes both recreational and environmental lands—perhaps they should be separated as environmental lands are not used for recreation.**

RESPONSE: As noted in Response #8e on Page 13, the park and environmental lands Level of Service (LOS) was established as part of past County analysis efforts. Changes to the LOS could be considered as future efforts are undertaken to update the Parks Master Plan or related efforts.

- f. **Gov Policy 3.5.2. is poorly written and does not set standards for amending.**

RESPONSE: Standards are not established in a comprehensive plan but in the implementing tools and methods. The criteria in GOV Policy 3.5.2 establish the guide for what must be under consideration. To be revised as follows:

GOV POLICY 3.5.2: Amendments to the Comprehensive Plan and requests for (re)development shall be evaluated ~~according to the following guidelines with consideration for their:~~

- ~~Contribute-ion~~ to a condition of a public hazard as described in the Comprehensive Plan.
 - ~~Aggravate-ion of~~ any existing condition of public facility deficiencies, as described in the Comprehensive Plan.
 - ~~Generate-ion of~~ public facility demands that may exceed capacity increases planned in the capital improvement program described in the annual budget.
 - ~~Conform-ity~~ to land uses as shown on the Future Land Use Map.
 - ~~Accommodate-ion of~~ public demands based upon adopted level of service standards and attempts to meet specified measurable objectives when public facilities are provided by developers.
 - ~~Demonstrate-ion of~~ financial feasibility when public facilities will be provided, in part or whole, by Pinellas County.
 - ~~Effect on state agencies and SWFWMD's facility plans.~~
- g. **GOV Goal 4: "Equitable improve the county's health" is not clear. Are we directing resources towards resolving past inequities or starting at ground zero?**

RESPONSE: See response 2 on Page 1.

Comments on PLANPinellas

Pinellas Conservation Coalition

Overview

One of the Strategic Goals of the Pinellas County Strategic Plan is to “Practice Superior Environmental Stewardship” by 3.2 *“Preserve and Manage Environmental lands, beaches, parks and historical assets.”*

We agree with this goal and encourage you to strengthen it within PLANPinellas. The county did an excellent job in identifying environmental areas, over 5 acres in size, that were valuable to the existence of Pinellas. Since the development of the strategic plan, several of those properties have been sold into development or threatened by developer interests. Slowly, many of the areas designated as rural residential, have been annexed by communities and developed as high-density units—completely the opposite of the intent of the Comp Plan.

The county owned area in decreasing in size but not in importance for preserving the mixture of residential to environmental—where our flora and fauna survive. Wandering the county one sees acre after acre going being denuded and transformed into “imaginary” Florida rather than natural Florida. The county has the last right of refusal to this rezoning but needs a strong plan for protection.

Reviewing the draft PLANPinellas we recommend:

Future Land Use (FLU) Comments

FLU Policy 1.1.4: Restricting urban sprawl should be an objective of its own—not correlated with conducting analysis and other planning efforts and should have its own policies and strategies. This is too important to be overlooked.

RESPONSE: Pinellas County is primarily built-out and does not have large parcels of land subject to new development. This Comprehensive Plan promotes concepts that align redevelopment patterns that are counter to urban sprawl. Future Land Use Objectives and Policies (e.g. FLU 2.2; 5.1); Housing strategies associated with HOU Objective 1.1; Transportation Objectives and Policies (e.g., TRA 2.1) and others address issues about efficient use of land and focusing growth in locations that are planned around proximity of uses and where they are supported by existing infrastructure and services.

Comments on PLANPinellas

Pinellas Conservation Coalition

FLU Policy 1.2.2.2: "Consider regulatory opportunities" and "Consider opportunities" is so weak as to have no meaning. There is no Policy to restrict local annexations of county land which is very important to controlling what happens to county land.

Suggest this section to add a specific percentage of open land be set aside as conservation use. Further suggest the percentage is 30%.

RESPONSE: Annexations are subject to State Statute requirements and outside of reviewing proposed annexations for adherence to statutory requirements, the County does not regulate annexations. The County does not have the ability to regulate annexations. The intent behind this Strategy is to provide the opportunity for the use of alternative regulatory tools to help guide redevelopment as part of community-specific, (or topic-specific [e.g., food access]), planning efforts that may have unique characteristics. This language allows for flexibility to utilize innovative approaches.

The Future Land Use chapter identifies land use categories that can preserve open space and environmentally sensitive land. The County also oversees a network of preserves and public parks. PLANPinellas outlines a series of objectives and policies to assist in the protection of natural resources and the Preservation and Recreation/Open Space land use categories are a tool to use to that end. However, identifying a specific percentage without a full understanding of the potential impacts to private property owners would not be appropriate at this time.

FLU Goal 6: Balanced relationship is not sufficient. At 98% built out, the relationship is very unbalanced and needs to be reassessed. The future of our children depends on the county preserving what little natural land, trees and clean water are left. The county uprooted the balance years ago. The strategies are excellent if they cannot be changed by annexation. We need stronger protection for native flora and fauna and the encouragement of maintenance of existing tree life.

RESPONSE: As Pinellas County takes a redevelopment focus in addressing the needs of the County as it continues to grow, the policies reflect the need to understand and balance both the built and natural environments. There are additional policies to protect environmental resources and habitats in other chapters including the Natural Resource and Conservation chapter. As the County makes land use decisions, there are policies across the chapters that will be considered.

FLU Goal 7: There should be an objective to preserve natural spaces in the land use pattern. Decisions to amend this Goal should also consider the natural importance of preserving what little open space we have left.

Comments on PLANPinellas

Pinellas Conservation Coalition

RESPONSE: FLU Goal 6 recognizes the relationship between the built environment and natural protection issues and works with other policies outlined in other chapters, including Natural Resources and Conservation Management and Recreation, Open Space and Culture. Future Land Use Categories are made available to protect open space and environmentally sensitive lands (e.g., Recreation/Open Space, and Preservation.) Goal 7 directly relates to infrastructure planning and development.

Natural Resources & Conservation (NRC) Comments

1. Natural Resources

- a. **NRC Strategy 1.1.1.1:** Change “encourage and incentivize” to require especially as relates to the mature and native tree canopy. Trees act as our lungs for the county and we can no longer allow them to be torn up.

RESPONSE: Different situations have unique circumstances and issues and the use of encourage and incentivize allows the County to determine in which situations ‘requires’ is supported and when some level of flexibility should be applied. NRC Objective 1.3 and associated policy and strategies seek to protect and enhance the County’s urban and natural tree canopy.

- b. **NRC Strategy 1.1.2.3:** Add all new development should support an aggressive tree canopy for energy efficiency and climate control.

RESPONSE: NRC Strategy 1.3.1.3 calls for the creation of an Urban Tree Master Plan to identify recommendations for preserving and enhancing the County’s tree canopy to address a range of environmental issues.

- c. **NRC Objective 1.2** is excellent to “protect, restore, enhance and manage environmental lands and resourced-based parts in perpetuity.”

RESPONSE: Noted

- d. **NRC Policy 1.2.2** should be stronger in stating that the county should purchase these lands to avoid their redevelopment rather than just be the land manager. Unfortunately, there is not time to wait for others to lead the way to purchase. The lands have already been identified. The county should ensure these lands are saved.

Comments on PLANPinellas

Pinellas Conservation Coalition

RESPONSE: The Plan addresses land acquisition as a tool that can be used to address natural resource protection and provides criteria to consider when determining if acquisition is appropriate. Funding for acquisition is not addressed in the comprehensive plan but would be part of other County programs, such as Penny for Pinellas.

- e. **NRC Strategy 1.2.2.1:** Equitably distribute environmental lands and resource-based parks—based on new acquisitions or prior inequitable distribution?

RESPONSE: As the County moves forward with implementing this Plan, the intent to find ways to provide citizens with the resources and amenities addressed in the Plan in an equitable way. As different approaches are implemented, whether it be requirements of new development or prioritizing land acquisition, equitable access will be a factor in the decision-making process. This statement under NRC Strategy 1.2.2.1 - 'equitably distribute environmental lands and resource-based parks throughout the County' – is one of the criteria when prioritizing land acquisition

- f. **NRC Objective 1.2:** "Protect and enhance the urban and natural tree canopy" should also follow if the land is annexed by a city within the county. Also, the planting of non-native trees should not be allowed to replace native trees.

RESPONSE: Annexed land would be required to follow the regulations of the annexing jurisdiction. NRC Strategy 1.1.1.1 encourages the retention of a native urban tree canopy and of trees removed for development. While natives are preferred and encouraged, there are times when non-natives may be the only alternative in some highly urbanized locations. In other situations, the availability of native species can be a limiting factor.

- g. **NRC 1.3.1.3:** Master plan for post-disaster tree canopy restoration needs to include plan for current restoration of tree canopy.

RESPONSE: The Urban Forestry Master Plan would address the County's restoration policies. This Strategy is identifying that it should include a post-disaster restoration component.

- h. **NRC Strategy 1.5.1.5** is excellent.

RESPONSE: Noted.

Comments on PLANPinellas

Pinellas Conservation Coalition

- i. **NRC Strategy 3.1.1.3:** Need strong language that this is past and that in the future county lands will not be allowed to substitute a recovery plan in order to develop a property as shown in NRC Strategy 3.1.4.1.

RESPONSE: The intent of Strategy 3.1.4.1 is to ensure that regulatory standards limit environmental impacts from development. Strategy 3.1.1.3 aims to address impacts that may have already occurred.

- j. **NRC Strategy 3.1.2:** should apply to all new and restoration development.

RESPONSE: This Strategy identifies that County projects should be included in these protection measures. Non-County development remains subject to the protection policies through this Chapter.

- k. **NRC Strategy 3.1.4.2:** Statement is weak and rather than “evaluate” it should read “ensure buffers”, “ensure the continued development of the ecological greenway system”.

RESPONSE: This Strategy recognizes that there may be more than one appropriate tool to protect the natural environment. The intent is not to commit to one solution but provide flexibility while still protecting our natural resources.

- l. **NRC Policy 4.1.3:** Add a strategy to map air quality issues throughout the county and distribute to residents annually.

RESPONSE: There are several existing resources that are available to the public that provide air quality information, including:

- [Pinellas County Air Monitoring | Florida Department of Environmental Protection](https://floridadep.gov/air/air-monitoring/content/pinellas-county-air-monitoring)
(<https://floridadep.gov/air/air-monitoring/content/pinellas-county-air-monitoring>)
- [Air Resource Management System \(ARMS\) Facilities | Air Resource Management System \(ARMS\) Facilities | Florida Department of Environmental Protection Geospatial Open Data \(state.fl.us\)](https://geodata.dep.state.fl.us/datasets/FDEP::air-resource-management-system-arms-facilities/explore?location=27.920563%2C-82.588037%2C10.66)
(<https://geodata.dep.state.fl.us/datasets/FDEP::air-resource-management-system-arms-facilities/explore?location=27.920563%2C-82.588037%2C10.66>)

Comments on PLANPinellas

Pinellas Conservation Coalition

- [AirData Air Quality Monitors \(arcgis.com\)](https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=5f239fd3e72f424f98ef3d5def547eb5&extent=-146.2334,13.1913,-46.3896,56.5319)
(https://epa.maps.arcgis.com/apps/webappviewer/index.html?id=5f239fd3e72f424f98ef3d5def547eb5&extent=-146.2334,13.1913,-46.3896,56.5319)

2. Recreation, Open Space and Culture

- a. **ROS Policy 1.1.1:** Rather than establish, “protect open spaces and retention of scenic vistas.”

RESPONSE: The Objective defines the need to protect these resources. The Policy establishes the direction to establish regulations in order to achieve that protection.

- b. **ROS Strategy 1.1.1.3:** Rather than address the need, “develop standards and procedures to retain recreation/opens space land use designations...”

RESPONSE: There is an analysis process that must occur to further understand what the appropriate criteria and standards should be, including the need for incentives. Utilizing 'address the need' supports this consideration.

- c. **ROS Policy 1.1.4:** Good. Pursue the acquisition and management of environmental lands, resource-based park lands and open space.”

RESPONSE: Noted

- d. **ROS Objective 2.1:** remove the word “balance” as that can be defined in many different ways: by cost allotment, by region of the county. Heritage sites should not be balanced off against recreational sites and ecological sites...all are important.

RESPONSE: The term ‘balance’ will be revised to say ‘complement’.

- e. **ROS Strategy 2.1.1.1:** Plan must include climate change impact on Gulf areas and resulting decrease in park and environmental lands. Why 14 acres per 1,000 residents? Why not 20 acres? Rationale?

RESPONSE: Understanding climate and sea level rise impacts is part of the County's on-going efforts, including vulnerability assessments and the Sustainability and Resiliency Action Plan, as supported by PLANPinellas. The park and environmental lands Level of Service (LOS) was established as part of

Comments on PLANPinellas

Pinellas Conservation Coalition

past County analysis efforts related to the Park Master Plan. Changes to the LOS could be considered as future efforts are undertaken to update the Parks Master Plan or related efforts.

- f. **ROS Policy 2.1.3:** Excellent greenways, blueways and trails master plan.

RESPONSE: Noted

- g. **ROS Strategy 2.1.4:** "Maintain and enhance equitable access" How is this determined? Is the Parks and Conservation Advisory Board able to determine this? How will you ensure adequate representation?

RESPONSE: Addressing equitable access means to identify where there may be gaps in access to these resources currently and to address those needs, understanding the challenges of being a built-out county, as part of the decision-making process.

We appreciate the planning department and your time in developing this Comprehensive Plan for the county. Thank you in advance for reviewing our comments.

If we can be of any assistance, please contact us at sswanson999@gmail.com or bethse@gmail.com.

Pinellas Conservation Coalition

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January 7, 2022

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RE: PC CD 21-03- Review of update to Comprehensive Plan (PLANPinellas)

Dear Rebecca:

Thank you for your submission of PLANPinellas for consistency review with the Countywide Rules. We commend the County for its thoughtful and detailed approaches to the proposed amendments, especially the detail to which it addresses the Future Land Use Categories & Rules as it relates to the Countywide Plan Rules. We also appreciate the County addressing our previous comments and for submitting this plan multiple times for review.

Below are our comments for the Future Land Use Map Categories and Rules Part 1:

- All permitted uses for local future land use categories are consistent with the Countywide Rules

RESPONSE: Noted.

- While addressed on Page 48, staff recommends that the acreage limitations for secondary uses be listed within the description of each land use category where relevant, for clarity and to avoid the appearance of inconsistency with the Countywide Rules
- Example - Residential Rural (corresponds to Countywide Rules Section 2.3.3.1):
Secondary Uses subject to Three Acre Maximum - Ancillary Nonresidential;
Transportation/Utility Secondary Uses subject to Five Acre Maximum - Institutional

RESPONSE: Addressed. An asterisk has been added to each of the associated uses directing the reader to the Additional Standards, noting the following:

**See 'Additional Standards' section of these Category Descriptions and Rules for the identified uses that have acreage thresholds.*

- The Target Employment Center section references the "Pinellas County Countywide Land Use Plan Map" as the location where the TEC overlay is depicted. Does this refer to the Forward Pinellas Countywide Plan Map, or is there a Pinellas County map by that name? As a reminder, the TEC overlay needs to be shown on an adopted map within the local comprehensive plan in order to be used.

RESPONSE: Text amended to provide the correct map title 'Forward Pinellas Countywide Plan Map.' The TEC Overlay map has been incorporated into the Categories and Rules document, to be adopted as part of this update.

Next, are our comments for the Future Land Use Map Categories and Rules Part 2:

- Recommend clarifying Section C to state that "Density/intensity averaging shall be allowed to

include any development rights available to, but previously unused by, existing developed property that is being added to or redeveloped, if part of a unified development, using the density/intensity averaging provisions of these Mandatory Rules." (While the language as currently written is the same as in the current Countywide Rules, we will be adding this language to the provisions for Density/Intensity Averaging in an upcoming amendment, consistent with a longstanding Rules interpretation.)

RESPONSE: Revised.

Lastly, are some minor comments regarding the Transportation and Governance Elements:

TRA Element

- Minor typo in NRC Strategy 4.2.2.1 - Amend 'forward Pinellas' to 'Forward Pinellas'

RESPONSE: Revised.

Governance

- Under GOV STRATEGY 1.1.1.1, "Countywide Future Land Use Plan" should be "Countywide Plan Map."

RESPONSE: Revised.

If you have any questions, please feel free to email me nrahman@forwardpinellas.org.

Sincerely,

N

Nousheen Rahman
Planning Analyst

Countywide Rules Determination of Consistency

Type of amendment:	Update to Comprehensive Plan
Submitted by:	Pinellas County
Date received:	12/22/2021
Subject of amendment(s):	Update to Comprehensive Plan - PLANPinellas
Consistency status:	<p><i>General Comments</i></p> <ul style="list-style-type: none"> We commend the County for its thoughtful and detailed approaches to the proposed amendments, especially the detail to which it addresses the Future Land Use Categories & Rules as it relates to the Countywide Plan Rules We also appreciate the County addressing our previous comments and for submitting this plan multiple times for review <p><i>FLUM C&R Part 1 Comments</i></p> <ul style="list-style-type: none"> All permitted uses for local future land use categories are consistent with the Countywide Rules While addressed on Page 48, staff recommends that the acreage limitations for secondary uses be listed within the description of each land use category where relevant, for clarity and to avoid the appearance of inconsistency with the Countywide Rules Example - Residential Rural (corresponds to Countywide Rules Section 2.3.3.1): Secondary Uses subject to Three Acre Maximum -Ancillary Nonresidential; Transportation/Utility Secondary Uses subject to Five Acre Maximum - Institutional The Target Employment Center section references the "Pinellas County Countywide Land Use Plan Map" as the location where the TEC overlay is depicted. Does this refer to the Forward Pinellas Countywide Plan Map, or is there a Pinellas County map by that name? As a reminder, the TEC overlay needs to be shown on an adopted map within the local comprehensive plan in order to be used. <p><i>FLUM C&R Part 2 Comments</i></p> <ul style="list-style-type: none"> Recommend clarifying Section C to state that "Density/intensity averaging shall be allowed to include any development rights available to, but previously unused by, existing developed property that is being added to or redeveloped, if <u>part</u> of a unified <u>development</u>, using the density/intensity averaging provisions of these Mandatory Rules." (While the language as currently written is the same as in the current Countywide Rules, we will be adding this language to the provisions for Density/Intensity Averaging in an upcoming amendment, consistent with a longstanding Rules interpretation.) <p><i>TRA Element</i></p> <ul style="list-style-type: none"> Minor typo in NRC Strategy 4.2.2.1-Amend 'forward Pinellas' to 'Forward Pinellas'

	<p><i>Governance</i></p> <ul style="list-style-type: none">• Under GOV STRATEGY 1.1.1.1, "Countywide Future Land Use Plan" should be "Countywide Plan Map."
Reviewed by:	Nousheen Rahman
Approved by:	