



November 2, 2020

Mr. Blake Lyon
Director, Pinellas County Planning Department
310 Court Street, 1st Floor
Clearwater, FL 33756

Re: Restoration Bay – The Tides
Case Number: Z/LU-14-09-19
Parcel: 33-30-15-00000-240-0100
RFAI Response #1

Dear Blake:

Thank you for the comments you provided regarding the referenced project. Ardurra Group, Inc. (Ardurra) has been working with the Applicant to provide specific responses to the questions. In that regard, please find below a reiteration of each of your comments (in **bold** typeset), each followed by Ardurra's response.

- 1. The layout of the proposed Development Master Plan substantially encroaches into and is reliant upon development within the 100-year flood plain, VE zones, and all levels of expected storm surge inundation from a CAT 1 through a CAT 5 hurricane. This expressly conflicts with Comprehensive Plan policies restricting development within the Coastal Storm Area and directing population concentrations out of the Coastal Storm Area.**

Ardurra Response: The applicant is proposing a conservation easement in perpetuity over those areas most vulnerable. Additionally, we have revised the mix of units to increase lot size and reduce density in each storm surge area and the corresponding Hurricane Evacuation zones thus directing density inland. For example on 100' lots will be proposed in the outer edge and will decrease as it goes inland.

- 2. While the proposed Future Land Use map designation of Residential Low is generally consistent with the surrounding area, the locational characteristics of the category recognize that the more appropriate designation for areas within the 100-year flood plain is Preservation or Recreation/Open Space and that the Residential Low category is only appropriate if Preservation and/or Recreation/Open Space are not feasible, which has not been demonstrated by the applicant.**

Ardurra Response: The Development Master Plan shows both preservation and open space; however, we have added a Conservation Easement layer to further demonstrate what areas will be protected by such Conservation Easement. This amounts to 35 acres of protected open space. Additionally, the applicant has proposed a 1.2 mile long multi-use public trail which connects from the Boca Ciega Millenium Park and goes all around the project boundary and ends at the Boca Ciega Bay Water Access/Trail Head. This will ensure that the public has recreational amenity access for everyone and not just golfers as under the previous use.

- 3. The RPD zoning district requires that the district be master planned as a creative, walkable and context-sensitive community that responds to the surrounding land use pattern and preserves unique natural features. Therefore, the Development Master Plan should seek to set aside the more vulnerable areas of the site for preservation/open**



space uses. The current design does not achieve this, nor does it evaluate and compensate for the impacts of future sea level rise.

Ardurra Response: Several design elements have been incorporated to further demonstrate that the proposed plan is creative, walkable, and context sensitive and preserves until natural features. Please see the revised RPD District Development Plan which shows 35 acres under conservation easement including the 1.2 mile long multiuse path facilitating public access to the coast not previously possible with the golf course. The conservation easement demonstrates that vulnerable areas have been set aside for preservation and open space uses. We have revised the lot mix to ensure that density is directed away from the coast. Consistent with recent creative design standards adopted by the City of St. Petersburg, we are proposing similar design standards to address wind, storm surge and sea level rise.

- 4. While projected roadway intersection levels of service are satisfactory, the proposed density of the project may alter the roadway classification of 66th Avenue North and creates traffic management conflicts that have not been mitigated by the applicant. The application does not consider unmet area needs of other multimodal improvements in the area (incomplete sidewalk gaps, trail connections) as required by the Transportation Element of the Comprehensive Plan when considering decisions on Future Land Use Map amendments.**

Ardurra Response: The applicant is willing to work with the County to determine which unmet area needs are feasible. It should be noted that the proposed plan does satisfy previously unmet needs by providing a public access multiuse path around the development that connects to the neighboring park. This certainly does provide a previously unmet need as the public will have access to the trail. Previously, as a golf course, you would only get to enjoy limited views of the waterfront as a paying golfer.

- 5. While the overall planned density of 3.1 units per acre for the entire site is consistent with existing surrounding densities, the proposed plan results in internal and external impacts that conflict with the County's Comprehensive Plan policies and established Land Development Regulations.**

Ardurra Response: The County has not specifically identified which Comprehensive Plan polices and established Land Development Regulations that pose potential conflict. The proposed RPD District Development Plan demonstrates consistency with the following Comprehensive Plan policies as outlined in the project narrative including but not limited to:

- Objective 1.16 and policies 1.16.1, 1.16.2, 1.16.3, 1.16.4, and 1.16.5 implementing the Brownfield Program to maximize the beneficial reuse of vacant and abandoned properties in a manner that contributes to economic vitality, community revitalization, community health, and environmental improvement.
- Objectives 3.1 and 3.2 together with related policies promoting balance between development and natural environment.
- Policy 1.3.5 preventing amendments in the coastal storm area with a FLUM category that permits more than 5.0 du/gross acre (proposed density is less than 3.0/acre).
- Objective 1.6 encouraging bicycle and pedestrian activity. The multiuse path will allow the area to be accessible to bicyclists and pedestrians.



- Goal Two under Natural Resource Conservation facilitating the restoration of the prior golf course use. The operation of the golf course's historical impacts to the environment will be assessed and remediated to FDEP standards. In addition, the proposed layout will provide stormwater treatment before the water reaches Boca Ciega Bay improving water quality.
- Policies 1.1.2 and 1.1.4 of the Housing Element promoting ways to maximize use of permitted densities on vacant residential land in recognition that urban land is becoming too scarce a resource to tolerate significant underutilization.
- Policy 1.6 of Recreation, Open Space and Culture Element to improve public access to County parks and other facilities including County beach access, parks, multiuse trails and boat ramp facilities.
- Objective 4.2 of the Facility Based Recreation Section encouraging the provision of facility-based recreation opportunities, where feasible, by public agencies, private enterprise and private developers.

6. When viewed in its totality, the proposed external stormwater treatment (while clearly beneficial to the area) comes at the expense of not setting aside the most vulnerable areas of the property for preservation/open space, and places residential development in these areas instead. On balance, the public benefit does not outweigh the overall impacts of the development and the loss of recreation/open space and preservation uses on the property.

Ardurra Response: As stated above, the applicant has proposed to place a conservation easement over 35 acres of the property including a multi-use trail to improve public access. The proposed development in conjunction with the proposed design standards, revised lot mix, public access to the coast, multi-use trails more than adequately demonstrates a balance between private and public needs.

We trust that with the receipt of this response letter and attached revised conditions, will be in a position to conclude the review of this project. Should you have any questions regarding this information, or require the submittal of additional information, please contact me at (813) 880-8881. Thank you for your assistance with this project.

Sincerely,

Clark C. Lohmiller, PLA
Planning & Landscape Architecture
Group Leader

CCL/lag

Enclosure

cc: File: 00121/2019-0195-00

