

**CW 19-04**  
**Forward Pinellas Staff Analysis**

**RELEVANT COUNTYWIDE CONSIDERATIONS:**

- 1) **Consistency with the Countywide Rules** – This proposed amendment is submitted by the City of Largo and seeks to amend the designation of 4.6 acres of property from Resort, Recreation/Open Space and an area with no designation to Resort.

The Countywide Rules state that the Resort category is "...intended to depict areas developed, or appropriate to be developed, in high-density residential and resort use; and to recognize such areas as well-suited for the combination of residential and temporary lodging use consistent with their location, surrounding uses, transportation facilities, and natural resources of such areas." Maximum residential density is limited to thirty (30) units per acre and non-residential uses cannot exceed a floor area ratio (FAR) of 1.2.

The subject property is located east of US Highway 19 and abuts the Largo Inlet which is a tidally influenced body of water that is connected to Old Tampa Bay to the north and east. This portion of US Highway 19 is designated as a primary multimodal corridor.

The subject property is the location of the Cove Cay Marina. The marina offers various services to its customers including boat storage, fuel sales, bait shop, and kayak rentals. The existing marina use is inconsistent with the Recreation/Open Space category but official records indicate that marina-related uses have existed on the property since the early 1970's. The current use is considered legal non-conforming and if approved, the proposed amendment will bring the use into conformance with the future land use plan and the City of Largo's Comprehensive Plan.

The current Countywide Plan Map identifies the western half of the property as Resort however, the remainder of the upland portion is designated as Recreation/Open Space. There is also a sizeable amount of property to the east that appears to be environmentally sensitive and the submerged portion of this area does not have a future land use designation. It should be noted that the new Countywide Rules removed the ability to apply a future land use designation to naturally-occurring bodies of water. With that said, it is staff's opinion that the amendment to Resort should be limited to the upland portion of the subject property which is approximately 1.2 acres.

An amendment inclusive of the subject property's upland areas can be deemed consistent with this Relevant Countywide Consideration.

- 2) **Adopted Roadway Level of Service (LOS) Standard** – The amendment area is located on a roadway segment where the existing Level of Service is operating at a LOS "D" or better, therefore those policies are not applicable.
- 3) **Location on a Scenic/Noncommercial Corridor (SNCC)** – The amendment area is not located on a SNCC, therefore those policies are not applicable.
- 4) **Coastal High Hazard Areas (CHHA)** – The Countywide Rules require a balancing of several criteria when evaluating increases in density and/or intensity within the CHHA. The intent of this approach is to provide flexibility in regulating coastal development by giving careful consideration of the potential impacts upon vulnerable populations (i.e., hospitals, assisted living facilities, mobile homes, etc.), infrastructure, public access to the water, and other relevant effects. The entire amendment area is located within the CHHA. In theory, the amendment to Resort would result in a potential increase in residential density and/or development intensity if the site was to be redeveloped. However, the City of Largo does not have zoning regulations and the local future

land use category limits the allowable uses to marinas, outdoor/active recreational facilities, commercial campgrounds, accessory dwellings in nonresidential districts, and other commercial, recreational, and other ancillary public/semi-public uses. Access to emergency shelter space and evacuation routes would not be significantly affected by the redevelopment of this site. In addition, the redevelopment of the property would utilize existing infrastructure, thus limiting any potential damage of publicly funded water, sewer, or other improvements by storm events. On balance, the requested amendment is consistent with the criteria used to evaluate the potential impacts of the proposed land use category within the CHHA.

- 5) **Designated Development/Redevelopment Areas** – The amendment area is not located within a designated development/redevelopment area, so those policies are not applicable.
- 6) **Adjacent to or Impacting an Adjoining Jurisdiction or Public Educational Facility** – The proposed amendment area is adjacent to unincorporated Pinellas County. Pinellas County staff reviewed the application and made a recommendation that the submerged lands be left with no designation on the Countywide Plan Map. This suggestion was forwarded to Largo staff. Pinellas County will have opportunity to further comment at the PAC meeting on February 4, 2019, if needed. The amendment area is not adjacent to a public educational facility, therefore those standards are not applicable.
- 7) **Reservation of Industrial Land** – The proposed amendment area does not involve the Employment, Industrial, or Target Employment Center categories, therefore those standards are not applicable.

**Conclusion:**

In consideration of, and based upon a balanced determination of the Relevant Countywide Considerations, it has been determined that the proposed Resort category is generally consistent. However, the requested 4.6 acre amendment to Resort would not recognize the site's submerged lands in an appropriate manner. Therefore, it is recommended that the board recommend an alternative compromise recommendation as per Section 6.2.1 of the Countywide Rules to approve an amendment to the Resort category for 1.2 acres of property (the uplands portion currently designated as Recreation/Open Space on the Countywide Plan Map) as identified on Map 7 of this report.