

**INNISBROOK RESORT
RPD MASTER PLAN REVISION
LAND USE PLANNING EXPERT REPORT**

Presented to:

**Pinellas County
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Clearwater, Florida**

Prepared for:

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Prepared by:

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Revised March 29, 2022

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I. INTRODUCTION

Innisbrook Resort was created as a golf resort and residential community in 1968 as one of the earliest Residential Planned Developments in Pinellas County. The initial size of Innisbrook Resort was 581 acres and after expansions in 1969 and 1976, the total size of the development is currently 845 acres. Innisbrook Resort is located in northern Pinellas County south of Klosterman Road, west of U.S. Highway 19 and east of Alternate Highway 19. Access to the Resort is via three roads: Klosterman Road, U.S. Highway 19 and Belcher Road.

The Innisbrook Residential Planned Development (RPD) is approved for 2,305 residential units and 38,075 square feet of commercial uses. Of the total approved development, 1,876 units have been constructed leaving 429 residential units available for development. At this time, none of these commercial entitlements have been constructed.

Residential development within Innisbrook Resort is composed of a mixture of condominiums, apartments and single family homes situated within and adjacent to the four golf courses. There are three clubhouses and four golf courses in the Resort: the Island Course, the Copperhead Course, the Osprey North Course, and the Osprey South Course. There are also three buildings with convention and event space located generally in the northern section of the site: Inverness Hall, Stirling Hall and Edinburgh Hall.

The Copperhead Course has been the location of the PGA Tour's Valspar Championship held every year since 1990, with the exception of 2001 when it was cancelled due to the September 11, 2001 national crisis and in 2020 when it was cancelled due to the pandemic. The Valspar Championship at Innisbrook is televised nationally and around the world, and in the most recent pre-pandemic year of 2019, the event attracted an attendance of 108,000 persons. Due to this extensive coverage and high attendance, the Championship has contributed tens of millions of dollars to local charities in the Tampa Bay area.

In addition to the golf courses, Innisbrook Resort has a variety of recreational activities for its residents and visitors including these facilities:

- Golf Driving Ranges and Teaching Facility,
- Tournament Tennis and Racquetball Facilities,
- Loch Ness Family Pool Facility and four additional pools,
- State of the Art Fitness Center,
- Salamander Spa and Wellness Facility, and
- Four Restaurants.

Although golf remains a major spectator sport, the continuous decline of resort guest and member play over the past 20 years is well documented. Consequently, the game of golf is changing throughout the United States to meet demographic and lifestyle changes. One of the key changes in the industry is the growing demand for golf course that can be played in a shorter time period and that can appeal to players of all ages and skill levels. These courses are shorter in length and are carefully designed to also challenge even the best players.

The owners of Innisbrook Resort have taken notice of these trends changes and wish to adapt one of the existing golf courses to remain competitive among the finest golf resorts in America, such as Pinehurst in North Carolina, Koehler in Wisconsin, Bandon Dunes in Oregon, and Pebble Beach in California. To feasibly address these changes, Innisbrook proposes to convert a portion of the Osprey North Course to a newly designed short course and redevelop 53.710 acres of this course for a new residential neighborhood. The Osprey North Course is located in the northern section of Innisbrook in proximity to Klosterman Road on the west side of Millridge Road, the development's north/ south spine road.

The new residential development will be located on new Parcel L with a maximum development potential of 180 single family detached and townhouse homes on 53.710 acres. There will not be any increase in the approved development potential within the Innisbrook RPD since the source of the proposed units for new Parcel L will be derived solely from the transfer of units from existing parcels. The three remaining golf courses, Island, Copperhead and Osprey South, will not be affected by this proposal and will remain fully operational in their current configuration. If the Plan Amendment and RPD Master Plan Revision Applications are approved, there will still be four golf courses providing recreational and open space for Innisbrook residents, members and visitors within Innisbrook Resort.

In addition to the Osprey North Golf Course, there are other existing improvements located on new Parcel L. These improvements include the Inverness Hall, a convention center with approximately 32,000 square feet and surface parking; and two office buildings located east of the Klosterman Road Gate with a total of approximately 11,000 square feet and surface parking. All of these buildings and their surface parking will be demolished to construct the proposed residential development on Parcel L.

In order to accomplish this proposal, the Applicant has submitted two applications simultaneously to Pinellas County for review:

1. Plan Amendment Application with two parts:

- a. For new Parcel L: Amend the Future Land Use Map from Residential Suburban, Residential Low Medium, and Recreation/ Open Space Categories to the Residential Low Plan Category;
- b. For Existing Parcels B, D, E, G and H: Amend the Future Land Use Map from Residential Estate and Residential Low Medium Plan Categories to Recreation/ Open Space Plan Category; and
For New Parcels L-6, L-7, L-8, L-9 and L-10: Amend the Future Land use Map from the Residential Suburban and Residential Low Medium Plan Categories to Recreation/ Open Space Plan Category.

2. **Master Plan Revision** to create new Parcel L with a maximum of 180 dwelling units and reflect the transfer of existing density to Parcel L; extinguish the approved development of 92 units on Existing Parcels B, D, E, G and H, and reduce the approved development on Existing Parcel F to 202 units reflect the units transferred from Parcel F to new Parcel L.

It should be noted that the existing entitlements within the RPD will not be increased with these applications and the location and amount of development for Innisbrook Resort will continue to be regulated by the RPD Master Plan.

This Planning Report has been prepared for the RPD Master Plan revision to describe the proposed new Parcel L Development parameters, the changes to the Master Plan, and to demonstrate the Master Plan's compliance with the criteria for a Type 3 Use. A separate Planning Report has been prepared to describe the proposed Plan Amendment Application and demonstrate its consistency with the County's *Comprehensive Plan*.

II. DESCRIPTION OF PROJECT

A. Proposed Redevelopment Project

The new Parcel L is proposed to be developed with a total of 180 single family detached homes and townhouses on a site of 53.710 acres. The residential units proposed for new Parcel L will be derived solely from existing entitlements within the Innisbrook RPD and there will not be any increase in the overall Innisbrook RPD approved units. Specifically, the units for new Parcel L will be transferred from approved but unused units on Parcels B, D, E, F, G and H. Additionally, the Plan Amendment proposes to extinguish the development rights for Parcels B, D, E, G and H by requesting the Recreation/ Open Space Plan Category for these five parcels.

- Parcel F was originally approved for 400 residential units and has been developed with 110 single family homes, leaving 290 remaining units. Of the remaining 290 units, 88 units are proposed to be moved from Parcel F to new Parcel L, leaving 202 residential units assigned to Parcel F.
- Parcels B, D, E, G and H are vacant parcels generally located in the southern and central portions of the Resort and the total number of units on these five parcels is 92 units, all of which are proposed to be transferred to new Parcel L.
- Summary: The Parcel F transfer of 88 units plus the Parcels B, D, E, G and H transfer of 92 units equals a total of 180 units to be developed on new Parcel L.

The accompanying Future Land Use Map Amendment proposes to designate new Parcel L with the Residential Low Plan Category on 42.827 acres and with the Recreation/ Open Space Category on 10.883 acres for a total site size of 53.710 acres. The proposed development of 180 residential units on 42.827 residentially designated acres results in a proposed density for new Parcel L of 4.2 units per acre, which is less than and therefore, consistent with the proposed Residential Low Plan Category which allows up to 5 units per acre.

In addition to the Osprey North Golf Course, there are other existing improvements located on new Parcel L. These improvements include the Inverness Hall, a convention center with approximately 32,000 square feet and surface parking; and two office buildings located east of the Klosterman Road Gate with a total of approximately 11,000 square feet and surface parking. All of these buildings and their surface parking will be demolished to construct the proposed residential development on Parcel L.

The Proposed RPD Master Plan for Innisbrook Resort is enclosed with this application and all of the revisions identified above are shown on the Proposed RPD Master Plan. The current RPD Plan has also been submitted with this application to assist in the review of the Proposed RPD Master Plan. In addition to the revised RPD Master Plan for the overall

Innisbrook, Framework Plans for new Parcel L have been submitted with this application and are described below.

B. Master Plan, Development Parameters & Guidelines

The Master Plan for Parcel L is illustrated on Page 1 of the Framework Plans.

Parcel L is located immediately south of Klosterman Road on both sides of Millridge Road, the north/ south spine road within Innisbrook Resort. The eastern portion of Parcel L is proposed for townhouse development, while the larger western portion will include both townhouses and single family detached homes. The existing Inverness Convention Center, two office buildings and their related surface parking located on new Parcel L will be demolished if the Applications are approved.

Environmental Issues

Wetlands: The location and configuration of Parcel L were carefully determined to exclude any wetlands; and, therefore, the redevelopment will not have any effect on wetlands on the site.

CHHA: With regard to the Coastal High Hazard Area (CHHA), the developer has designed the community to comply with Objective 1.3 of the *Coastal Management Element* as reflected in these commitments:

- The project does not locate any new residential dwellings on lands that are currently designated with the Recreation/ Open Space Plan Category and that are also located within the CHHA. This design has been done to comply with Objective 1.3 to direct population concentrations out of the coastal storm area.
- The entrance road to the western townhouses is located within the CHHA and this road will be designed to at or above the Pinellas County Base Flood Elevation to allow for evacuation of these townhouse residents, in the event of a major storm event.

Potential Sea Level Rise: Additionally, the developer is voluntarily committing to several measures to address the potential for future sea level rise. These measures include the following:

- All roads within the community will be constructed at or above the Pinellas County Base Flood Elevation. The entrance road to the western townhouse area will also include cross culverts to allow for drainage to flow under the road and maintain flood elevations on lands outside of Parcel L.

- The current Pinellas County Coastal Model Base Flood Elevation on the site varies between 10.9' to 11.1'. The current required Minimum Finished Floor Elevation is 12', one foot above the Base Flood Elevation. The National Oceanic and Atmospheric Administration (NOAA) 2050 Intermediate- High Scenario at the nearest coast gauge estimates an additional 1.67' of future sea level rise for this area. Therefore, all residential buildings within Parcel L will be designed and constructed to exceed the required Finished Floor Elevation by two feet (2") to minimize potential impacts from the estimated future sea level rise.

Dimensional Requirements

The single family detached homes within proposed Parcel L are a combination of 50' and 60' wide lots. The final lot size mix and lot location will be determined by the developer during the final construction plan and subdivision platting review. The proposed dimensional regulations for the townhouses and single family homes proposed for Parcel L are shown on the Development Plan and also in the table below.

Innisbrook Resort Parcel L Dimensional Parameters

Lot Size	<u>Single Family Detached:</u> 5,000 sf & 6,000 sf
Lot Dimensions	<u>Single Family Detached:</u> 50' x 130' 60' x 130'
Setbacks- Principal Structure	<u>Single Family Detached</u> Front: 20' Side: 5' Rear: 15' Corner Lot: 15' from Secondary Street <u>Townhouses</u> Front: 20' Rear: 10' Between Buildings: 15'
Setbacks- Accessory Structures	5' from Side & Rear Lot Lines
Height	35' all Residential Units

The location and development of new Parcel L has been carefully designed to minimize impact on the existing condominiums within Innisbrook and with the existing residential development outside of the Resort to the north and west of new Parcel L. Within Innisbrook, the Osprey North Golf Course will remain as open space and buffer between Parcel L and the condominiums to the east and south. It should be noted that the general area surrounding the external boundaries of the Innisbrook Resort is also residential in nature.

In the vicinity of Parcel L is an existing church (to the west of Parcel L) and a single family subdivision, Klosterman Oaks (to the north of Parcel L). Since the proposed use of Parcel L is residential and the existing uses are residential and institutional, the proposed low scale Parcel L is compatible with these low scale existing uses.

To further increase the compatibility between these uses, the Development Master Plan proposes landscape buffers along the perimeter in the vicinity of the existing uses as described below:

- East of Millridge Road and adjacent to Klosterman Road: 20' landscaped buffer.
- West of Millridge Road and adjacent to Klosterman Road: 30' landscaped buffer.
- Along the Parcel L boundaries adjacent the existing church: 30' landscape buffer and opaque fence.
- Along the Parcel L north boundary between the western townhouses and Klosterman Oaks: 15' landscape buffer and opaque fence.

Within all of these proposed landscape buffers, the existing landscaping and trees will be retained as much as is feasible and additional landscape materials will be installed to compose the required buffers. These buffers are shown on both the **Master Plan** (Page 1) and the **Open Space Plan** (Page 4) of the Parcel L **Framework Plan**.

C. Transportation Framework

The Transportation Plan for Parcel L is shown on Page 2 of the Framework Plans.

The current access to Innisbrook Resort is accomplished through three roads: Klosterman Road, U.S. Highway 19 and Belcher Road. The Belcher Road and Klosterman Road entrances are staffed gates. It is assumed that the residents of new Parcel L will use both the Belcher Road and Klosterman Road entrances. There are no changes planned to the Belcher Road entrance as part of this project; however, improvements are proposed to the Klosterman Road entrance for improved access both for new Parcel L and to all of the Resort.

As shown on the **Transportation Plan**, the existing gate house at the Klosterman Road entrance will be relocated to the south for two reasons: to create a new entrance for the western portion of Parcel L and to increase the stacking space at this entrance for the rest

of the Innisbrook residents. From Millridge Road, residents who live in the western part of Parcel L will turn west into the new community before the relocated gate location and continue through the interior gate that provides security for this section only.

In addition to the relocated gate house, the revised Klosterman Road entrance will create two lanes: the outside lane for Innisbrook residents with a key card and/ or scanner feature, and an interior lane for visitors to stop at the gate house. This proposed entrance is much superior to the current entrance that has minimal stacking space and a single lane entrance for both Innisbrook residents and visitors.

A second access to the southern section of Parcel L is proposed via the interior road Pine Burr Drive, and this entrance will also be secured with a gate and key card and/ or scanner feature.

Access to the eastern townhouse parcel is south of the relocated gate house and will be in the same general location as the existing driveway for the two office buildings that will be removed with this development. At the eastern end of the townhouse parcel, an emergency exit only will be constructed on Klosterman Road, if required by the Fire Marshall.

D. Land Use Framework

The Land Use Framework for Parcel L and the surrounding area are shown on Page 3 of the Framework Plans.

The Applicant has submitted a Plan Amendment simultaneously with this RPD Master Plan Revision to change the current Plan Categories on Parcel L to the Residential Low Plan Category (5 units/ acre) for the entire site. As shown on the **Land Use Framework Plan**, Parcel L is currently designated with the Residential Suburban, Residential Low Medium, and Recreation/ Open Space Categories.

As shown on the **Land Use Framework Plan** and in the accompanying *Future Land Use Map* Amendment, Parcel L is proposed to be designated with 42.827 acres as Residential Low and 10.883 acres as Recreation/ Open Space, for a total parcel size of 53.710 acres.

As shown on the **Land Use Framework Plan**, there is no change to the zoning on Parcel L since it is currently zoned RPD as part of the Innisbrook Resort RPD.

As is evident on the **Land Use Framework Plan**, the predominant Plan Categories and Zoning Districts in the vicinity of Innisbrook Resort are for residential use, which is the predominant existing land use adjacent to the new development, second in size only to the larger recreation/ open space lands within Innisbrook.

E. Open Space Framework

The Open Space Plan for Parcel L is shown on Page 4 of the Framework Plan.

Within Parcel L, there will be a total of 10.883 acres of Recreation/ Open Space Plan category property to provide open space for the residents of Parcel L.

Additionally, the residents of Parcel L will have access to all of the recreational uses within Innisbrook Resort including the following amenities:

- Golf Driving Ranges and Teaching Facility,
- Tennis and Racquetball courts and Teaching Facility,
- Loch Ness Family Pool Facility and four additional pools,
- Fitness Center, and
- Salamander Spa.

F. Utilities & Stormwater Framework

The Utilities and Stormwater Plan for Parcel L are shown on Page 5 of the Framework Plan.

The existing utility lines and location and conceptual design of the proposed utility lines are shown on this **Utilities and Stormwater Plan**. The water and sewer utilities for new Parcel L will be constructed by the developer and, after construction, owned and operated by Pinellas County.

There are two proposed stormwater management areas within Parcel L in the locations as shown on the Plan. It is understood that the stormwater management system will be required to meet the design standards and permit process of both Southwest Florida Water Management District (SWFWMD) and Pinellas County.

III. COMPLIANCE WITH CRITERIA FOR TYPE 3 USE

The Pinellas County *Land Development Code* Section 138.241 establishes six criteria for review of a Type 3 Use, which is the review process for the RPD Master Plan Revision. Each of the review criteria is shown below in **bold**, followed by an analysis of how the proposed RPD Revision meets the criteria.

a. The proposed use is consistent with the Pinellas County Comprehensive Plan and with the purpose and intent of the applicable zoning district.

Opinion: The RPD Master Plan's consistency with the *Comprehensive Plan* is demonstrated in the attached analysis and please refer to that document for the full evaluation.

With regard to the Master Plan Revisions' consistency with the site's RPD Zoning district, the *Land Development Code* does not prescribe any development parameters for RPD projects. Rather, each RPD may propose its unique development parameters to reflect the project's character. The development parameters for new Parcel L are shown on the Master Plan, Page 1 of the Framework Plans, and are described below.

- Allowable Use: the RPD District states that residential use shall be the predominate use within the district and the Innisbrook RPD meets this requirement with the residential uses occupying a significant amount of the property, second only to the recreation/ open space lands.
- Variety of Housing Options: The RPD District states that there shall be a variety of housing options with at least two residential styles. Innisbrook currently is developed with single family detached and multifamily styles of residential development. With this revision to the RPD, there will be additional single family detached homes and a third residential style of townhouses added to the RPD.
- Commercial, Office and Accommodation Uses: The RPD District states that commercial, office and accommodation uses may be allowed with certain restrictions. Innisbrook RPD is currently approved for 38,075 square feet of commercial uses but these uses have not yet been constructed in the RPD and no changes are proposed to the commercial uses with this Application.
- Common Open Space: The RPD District requires a minimum of 10% of the site as Common Open Space. The current Innisbrook RPD greatly exceeds that requirement with over 618 acres of open space on the total site of 845 acres, representing 73% of the total RPD site devoted to open space. With this proposed RPD Master Plan Revision and related Plan Amendment Application, the amount of open space will decrease slightly but the RPD will still greatly exceed the

Common Open Space requirement with 604.8 acres of recreation/ open space, representing 71.5 % of the total RPD site.

In summary, based on this analysis, in my expert opinion, the proposed RPD Revision is in compliance with this criterion.

- b. There is adequate separation of the proposed use and related structures from adjacent and nearby uses by screening devices, buffer area, and / or other appropriate means.**

Opinion: Within Innisbrook Resort, the proposed residential development on Parcel L is well separated and buffered from the existing condominiums to the south and southwest by the North Golf Course.

There are buffers proposed between the existing church and Klosterman Oaks subdivision to the northwest of Parcel L as described and depicted on the Master Plan. The Applicant also proposes to retain as much existing landscaping and mature trees in these buffer areas.

Based on this analysis, in my expert opinion, the RPD Master Plan Revisions are in compliance with this criterion.

- c. Adequate driveways, walkways, and parking are available or proposed so that no vehicular circulation or parking problems are created.**

Opinion: The new development on Parcel L is proposed to have two access points for the larger western portion of the site, and one full and one emergency access for the eastern townhouse portion. All entrances to Parcel L will be gated for security purposes. For a project with 180 dwelling units, the number of access points is more than sufficient. The parking for both the single family detached homes and townhouses will be located on each lot, and therefore, the proposed development will not create any parking problems. Therefore, based on this analysis, in my expert opinion, the RPD Master Plan Revisions are in compliance with this criterion.

d. The proposed use will not create excessive vehicular traffic or other traffic problems.

Opinion: As proposed in the **Transportation Framework Plan**, the project proposes to improve the Klosterman Road entrance by relocating the gate house to the south to increase the stacking space and provide separate lanes for residents and visitors. These improvements will assist in the efficient movement of traffic travel to Innisbrook and Parcel L from Klosterman Road.

Although the project is not required by the *Land Development Code* or *Comprehensive Plan* to prepare a Transportation Management Plan or Traffic Impact Study, the Applicant's Traffic Engineer, Kimley Horn, did prepare a Traffic Impact Study to determine if the project would have an effect on the transportation network. The results of the Traffic Study confirm that the proposed project will not have any negative effect on the transportation network. Please refer to the Traffic Impact Study submitted as **Document A-9** of the Plan Amendment application for the detailed analysis.

Therefore, based on this analysis, in my expert opinion, the RPD Master Plan Revisions are in compliance with this criterion.

e. Drainage problems will not be created on the subject property or nearby properties.

Opinion: The **Utility and Stormwater Framework Plan** for Parcel L has identified the conceptual locations for stormwater management areas. It is understood that the specific design must be reviewed and approved by both Pinellas County and Southwest Florida Water Management District (SWFWMD). Therefore, based on this analysis, in my expert opinion, the RPD Master Plan Revision is in compliance with this criterion.

f. All provisions and requirements of the applicable zoning district will be met, unless otherwise varied by the authorized reviewing body as authorized by this Code.

Opinion: The proposed RPD Master Plan Revision is in compliance with the RPD District as demonstrated in the Response to **Criterion a** above.

IV. SUMMARY

The proposed Revision to the Innisbrook Master Plan creates a new Parcel L with a maximum of 180 residential units in the north section of the site on a total size of 53.710 upland acres. There is no increase in the total development potential for the Innisbrook RPD since the source of the proposed units for new Parcel L will be derived solely from the transfer of approved units from existing parcels within Innisbrook. The development potential for Parcel L will be transferred from 92 approved but unbuilt residential units on Parcels B, D, E, F, G and H, leaving no development potential on these five parcels. A total of 88 units are proposed to be transferred from Parcel F, leaving 202 units assigned to Parcel F. The transfer from Parcel F of 88 units plus the transfer from Parcels B, D, E, G and H of 92 units results in a total of 180 units to be transferred to new Parcel L for this project.

The Osprey North Course is proposed to be converted to a newly designed short course as part of this RPD Revision to address the changes in the game of golf; however, no changes are proposed to the three other Courses. If this proposed revision is approved to the RPD, Innisbrook Resort will remain as a high quality golf resort and residential community with four golf courses and extensive recreational amenities.

The location and configuration of Parcel L was carefully determined to exclude any wetlands and therefore, the redevelopment will not have any effect on wetlands on the site. Additionally, there are no residential units proposed to be located within the CHHA on property that is currently designated as Recreation/ Open Space on the *Future Land Use Map*. The purpose of this design is to comply with Objective 1.3 of the *Coastal Management Element* of the *Comprehensive Plan*.

Although not required by County regulations, the developer has voluntarily committed to measures to provide additional protection for the project as a result of potential future sea level rise. The developer will design and construct all roads within the community at or above the Pinellas County Base Flood Elevation. Additionally, the entrance road to the western townhouses will provide drainage flow under the entrance road to maintain stormwater flows. The developer will also construct all residential buildings to exceed the required Finished Floor Elevation by two feet (2') to account for potential future sea level rise as estimated by National Oceanic and Atmospheric Administration for 2050.

In addition to the proposed RPD Master Plan Revisions, the Applicant has submitted the required Framework Plans for new Parcel L to demonstrate its compliance with the RPD Requirements.

This Land Use Planning Expert Report has demonstrated, and my expert opinion is, that the proposed RPD Master Plan Revision for Innisbrook Resort is consistent with the *Comprehensive Plan*, and complies with the Criteria for a Type 3 use as established in the *Land Development Code* Section 138.241.

**INNISBROOK RESORT
RPD MASTER PLAN REVISION
LIST OF SUBMITTAL DOCUMENTS**

DECEMBER 15, 2021

Document #	Document	Date	Prepared by
B-1	Land Use Planning Expert Report	December 15, 2021	Tarapani Planning Strategies
B-2	Certificate of Ownership	December 13, 2021	Salamander Innisbrook LLC
B-3	Title Opinion	December 13, 2021	Coastline Title of Pinellas
B-4	Boundary Survey of New Parcel L	November 17, 2021	Ardurra
B-5	Legal Description of New Parcel L	Not dated	Ardurra
B-6	Innisbrook Resort Proposed RPD Master Plan	December 15, 2021	Ardurra
B-7	Innisbrook Resort Current RPD Master Plan	April 10, 2021	King Engineering
B-8	Innisbrook Resort New Parcel L Framework Plans	November 1, 2021	Ardurra

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MARCH 7, 2022

Document #	Document	Date	Prepared by
B-1	Land Use Planning Expert Report, Revised	March 7, 2022	Tarapani Planning Strategies
B-6	Innisbrook Resort Proposed RPD Master Plan, Revised	March 7, 2022	Ardurra
B-8	Innisbrook Resort New Parcel L Framework Plans, Revised	March 7, 2022	Ardurra

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MARCH 21, 2022

Document #	Document	Date	Prepared by
B-1	Land Use Planning Expert Report, Revised	March 21, 2022	Tarapani Planning Strategies
B-6	Innisbrook Resort Proposed RPD Master Plan, Revised	March 21, 2022	Ardurra
B-8	Innisbrook Resort New Parcel L Framework Plans, Revised	March 21, 2022	Ardurra

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MARCH 29, 2022

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B-1	Land Use Planning Expert Report, Revised	March 29, 2022	Tarapani Planning Strategies

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Evaluation of Application's Consistency with Comprehensive Plan

Plan Amendments must be consistent with the *Comprehensive Plan* with regard to both the Plan Category requested and with the applicable Goals, Objectives and Policies of the Elements of the Plan. This Section of the Planning Report will evaluate the Application's consistency with both major provisions of the *Comprehensive Plan*.

A. CONSISTENCY WITH THE PROPOSED PLAN CATEGORY

New Parcel L is currently designated with three categories, one of which, Recreation/ Open Space, does not allow residential development. In order to allow residential development and consolidate the same plan category on all of Parcel L, the Applicant requests the Residential Low Plan Category with a maximum density of 5 units per acre. The purpose of the Residential Low Category is stated in the *Future Land Use Map Categories, Descriptions and Rules* in the *Future Land Use Element* as follows:

“Purpose- It is the purpose of this category to depict those areas of the County that are now developed, or appropriate to be developed, in a low density residential manner; and to recognize such areas as primarily well suited for residential uses that are consistent with the low density non-intensive qualities and natural resources characteristics of such areas.”

The only primary use in the Residential Low Category is residential use which is the same use as is proposed by this Plan Amendment. The maximum density in the Residential Low Category is five (5) dwelling units per acre. The proposed development on Parcel L of 180 units on 42.827 residentially designated acres results in a project density of 4.2 units per acre, which is less than, and, therefore, in compliance with the Residential Low Category maximum density of five units per acre. It should be noted that the density for Parcel L is calculated solely on the 42.82 acres of the site that are proposed to be designated with the Residential Low Plan Category and does not include the 10.883 acres within Parcel L that are proposed for the Recreation/ Open Space Plan Category.

Innisbrook's original zoning was approved for the RPD-5, Residential Planned Development District at a maximum density of 5 units per acre as applied to the overall site. The current approval for Innisbrook Resort RPD results in a density of 2.87 units per acre, when excluding the wetlands on the site. The Residential Low Plan category is the predominant Plan Category to the north and northwest of the Plan Amendment site, Parcel L. The closest development to the east

of Parcel L is composed of existing Innisbrook condominiums. To the south of Parcel L is the Osprey North Golf Course which will remain in use as a golf course.

Based on this analysis, in my expert opinion, the proposed Plan Amendment is consistent with the purpose, use characteristics, locational characteristics and maximum density of the requested Residential Low Category.

B. CONSISTENCY WITH THE APPLICABLE GOALS, OBJECTIVES AND POLICIES OF THE COMPREHENSIVE PLAN ELEMENTS

The Application will be reviewed against the applicable Goals, Objectives and Policies of Pinellas County's *Comprehensive Plan* Elements. The Goal, Objective or Policy is shown below in **bold**, followed by the planning analysis for this Application.

FUTURE LAND USE ELEMENT

Goal 1: The pattern of land use in Pinellas County shall provide a variety of urban environments to meet the needs of a diverse population and the local economy, conserve and limit demands on natural land economic resources to ensure sustainable built and natural environments, be in the overall public interest, and effectively serve the community and environmental needs of the population.

Objective 1.2: Establish development regulations that respond to the challenges of a mature urban county with established communities that are experiencing infill development and redevelopment activity.

Policy 1.2.3: Plan designations on the Future Land Use Map shall be compatible with the natural environment, support facilities and services, and the land uses in the surrounding area.

Policy 1.2.4: Recognizing that successful neighborhoods are central to the quality of life in Pinellas County, redevelopment and urban infill development should be compatible with and support the integrity and viability of existing residential neighborhoods.

Opinion: Residential development in Northern Pinellas County continues to be very desirable and this Plan Amendment represents a logical infill residential development in an area for which services are currently available. The Plan Amendment site has been configured to contain only uplands and all wetlands are located outside of the Plan Amendment boundary and will be preserved in their current state.

At the southeast corner of the western townhouse parcel, there is a small area of 0.038 acres that is currently designated on the County's *Future Land Use Map* with the Preservation Plan Category. However, based on the Wetlands Survey prepared by Ardurra, this small area is outside

of the actual wetland boundary and has been determined to be uplands. Since this small area is uplands, the Preservation Plan Category is not appropriate for this area and the County has agreed that this area can be adjusted from its Preservation Plan Category to the Recreation/ Open Space Category. Other than this small area which has been adjusted, there are no wetlands on Parcel L.

Therefore, based on this analysis, in my expert opinion, the Plan Amendment is consistent with this goal, objective and policies.

Objective 1.17: Pinellas County shall preserve and seek to enhance established community values, a community unique identify and their social support structure, and will make decisions that are in concert with a community's established vision for their future.

Policy 1.17.2: Consistent with the purpose and intent of the Comprehensive Plan and Section 134-82 of the Land Development Code, Pinellas County shall make decisions, both unincorporated and countywide, that do not detract from the established community identity and social support structure but, instead, serve to preserve and enhance that identity and structure.

Opinion: The proposed Plan Amendment will be developed with the same residential use as exists within Innisbrook currently and the new development will be fully integrated into the Innisbrook Resort. Additionally, the configuration of the Plan Amendment site preserves the significant amount of open space and recreational activities within Innisbrook Resort. Therefore, based on this analysis, in my expert opinion, the Plan Amendment is consistent with this policy.

Objective 1.8 Pinellas County shall continue to implement future land use policies that restrict the proliferation of urban sprawl at a density which is not compatible with support facilities.

Opinion: The Plan Amendment site is located within the substantially built-out Innisbrook Resort in a highly urbanized area of North Pinellas County. Therefore, the Plan Amendment site does not create or contribute to urban sprawl. Based on this analysis, in my expert opinion, the Plan Amendment is consistent with this objective.

Goal Three: Pinellas County's Plan shall promote a balanced relationship between the natural environment and development.

Objective 3.1: The Pinellas County Land Development Code shall be applied in a manner that ensures compatibility between the Future Land Use Map, existing environmental conditions and constraints, as well as environmental management goals.

Policy 3.1.2: Designated preservation areas shall be retained as undeveloped land suitable for passive recreation, conservation, or aesthetic uses to provide opportunities to appreciate the natural environment.

Objective 3.2: Pinellas County shall continue its proactive program for managing the impacts of development upon the County's natural resources (including wetland, uplands, and the marine environment), and shall continue to ensure that these resources are successfully integrated into the urban environment such that the overall function and viability of these areas are maintained, or where practical, enhanced or restored.

Policy 3.2.3: Pinellas County shall continue to use a variety of methods for protecting the County's open space areas and natural resources (including wetlands) which include, but are not limited to, the acquisition of open space and environmentally sensitive areas, allowing the Transfer of Development Right (TDRs), density averaging , and requiring upland buffers adjacent to wetlands and other natural environments identified by Pinellas County.

Opinion: The Plan Amendment site has been carefully created to include only uplands within its borders. There are wetlands outside of the Plan Amendment site that are not included in the development, will be preserved in their current state, and, therefore, will not be affected by this Plan Amendment. Therefore, based on this analysis, in my expert opinion, the Plan Amendment is consistent with this objective and policy.

Goal 4: Pinellas County shall work toward a land use pattern that can be supported by the available community and public facilities that would be required to serve that development.

Objective 4.1: The Pinellas County Concurrency Management System will insure that compatibility of all proposed development with the capacities of the existing and planned support facilities for which a level of service standard has been adopted in this plan.

Policy 4.1.1: The Concurrency Management System will ensure proposed development to be considered for approval shall be in conformance with existing and planned support facilities for which a level of service standard has been adopted and that such facilities and services are available, at the adopted level of service standards, concurrent with the impacts of development.

Objective 4.2: The Concurrency Management system, applicable policies within the Pinellas County Comprehensive Plan, and the standards and the locational and use characteristics as set out in the Future Land Use Category Descriptions and Rules of the Future Land Use and Quality Communities Element comprise the County's Program in which development shall be coordinated with the availability of public and private utilities.

Policy 4.2.1: Land use location and intensity shall be accurately defined and monitored through the Concurrency Management System, the Future Land Use and Quality Communities Element, including Policy 1.2.1, to endure coordination with the availability of facilities and services.

Policy 4.2.3: when making decisions on requests to amend the Future Land Use Map (FLUM) or the Zoning Atlas (other than decisions on appropriate locations for mixed-use development and transit oriented development), Pinellas County shall review the potential impact on the transportation system by considering the following:

- Ability of the surrounding existing and planned transportation network to meet the mobility objectives of the Comprehensive Plan;
- Capacity of the surrounding existing and planned transportation network to accommodate any projected additional demand; and
- Extent to which the proposed FLUM amendment or rezoning furthers the intent of the Comprehensive Plan to improve mobility.

Opinion:

- With regard to water and sewer service, there are existing utility lines that are available to serve the Plan Amendment site.
- With regard to Transportation, a Traffic Impact Study has been prepared and included in this Plan Amendment application. The results of the Study demonstrate that the roads are anticipated to continue to operate at acceptable levels of service if the Plan Amendment is approved. Please also see the section of this Report that evaluates the goals, objectives and policies of the *Transportation Element* for a more detailed discussion.
- With regard to stormwater management, the Plan Amendment site will comply with the stormwater management requirements of both Pinellas County and Southwest Florida Water Management District (SWFWMD), which compliance will be demonstrated during the construction and permit review system of these agencies.
- With regard to solid waste, the development will be served by the County's collection contractor and taken to the Resource Recovery Plant for disposal. Based on Chapter 2 of the *Solid Waste and Resource Recovery Element*, the waste-to-energy plant is operating at approximately 79% of its capacity and, therefore, can accommodate this new development.
- With regard to Recreation, there are a wide variety of recreational opportunities available within Innisbrook that will be available to the residents of the Plan Amendment site. These recreational opportunities include four golf courses, driving ranges and teaching facilities; tennis and racquetball courts and teaching facilities; five swimming pools; a fitness center and spa. Based on these extensive on-site recreational opportunities, except for beach visits, the residents of the Plan Amendment site will not have to leave the site for their recreational needs.

Based on this analysis, in my expert opinion, the Plan Amendment is consistent with this goal, objectives and policies.

TRANSPORTATION ELEMENT

Goal 1: Provide for a safe, convenient, and energy efficient multimodal transportation system that serves to increase mobility, reduce the incidence of single-occupant vehicle, efficiently utilize roadway capacity, reduce the contribution to air pollution from motorized vehicles and improve the quality of life for the citizens of Pinellas County.

Objective 1.1: Develop and maintain a multimodal transportation system that increases mobility for bicyclists, pedestrians and transit users as well as motorists and users of aviation and rail facilities, and that promotes development patterns that reduce vehicle miles traveled and greenhouse gas emissions.

Policy 1.1.1: Pinellas County shall implement a Pinellas County Mobility Management System through the application of Transportation Element policies and site plan and right-of-way utilization review processes. Policies pertaining to the application of the Mobility Management System are listed below.

- a. All development projects generating new trips shall be subject to payment of a multimodal impact fee.**
- b. Development projects that generate between 51 and 300 new peak hour trips on deficient roads shall be classified as tier 1 and required to submit a transportation management plan (TMP) designed to address their impacts while increasing mobility and reducing the demand for single occupancy vehicle travel.**
- c. Development project that generate more than 300 new peak hour trips on deficient roads shall be classified as tier 2, required to conduct a traffic study and submit an accompany report and TP based on the report findings.**
...
- f. Deficient roads shall include those operating at peak hour level of service (LOS) E and F and/ or volume-to-capacity (v/c) ratio 0.9 or greater without a mitigating improvement scheduled for construction within three years.**
...

Opinion: With regard to Policy 1.1.1.a, the Developer is aware of and will pay the appropriate mobility impact fees for the new development on Parcel L, with mobility fee credits given for the existing uses that will be demolished.

With regard to the balance of Policy 1.1.1, the Applicant's traffic consultant, Kimley Horn, has calculated the estimated net trips for the project as 170 PM peak-hour trips. Based on the *Forward Pinellas Level of Service Report*, the two roads accessing the Plan Amendment site (Klosterman Road and Belcher Road) both operate at Level of Service D or better. Since deficient roads are defined in Policy 1.1.1f as having a LOS E or F, neither Klosterman Road nor Belcher Road are defined as deficient roads. Therefore, based on Policy 1.1.1.b, although the Plan Amendment site is expected to generate between 51 and 300 new peak trips, since the project will not impact deficient roads, the Plan Amendment site is not required to prepare a Transportation Management Plan or Traffic Study.

However, Kimley Horn did prepare a Traffic Study to determine if the project would have an effect on the transportation network and this Study has been submitted as **Document A-9** of this Plan Amendment application. The results of the Traffic Study demonstrate that the roads are anticipated to continue to operate at acceptable levels of service with the proposed Plan Amendment. It should be noted that the Applicant intends to improve the current gated access from Klosterman Road that will serve the Plan Amendment site. These improvements are shown in detail on the Framework Plans submitted with the RPD Master Plan Revision.

It should also be noted that due to the variety of recreational activities and restaurants within the Innisbrook Resort, the number of off-site trips for these purposes is reduced since these services are available without leaving the Resort.

Based on the Kimley Horn Traffic Study and the above analysis, in my expert opinion, the Plan Amendment is consistent with this goal, objective and policy.

NATURAL RESOURCE CONSERVATION & MANAGEMENT ELEMENT

Goal 2: Pinellas County will conserve, protect, restore and appropriately manage its natural systems and living resources to ensure the highest environmental quality possible.

Objective 2.1: Pinellas County shall continue to implement management programs for the conservation of natural ecosystems and species of conservation concern (inclusive of native vegetative communities, terrestrial, marine, estuarine and aquatic ecosystems, and native wildlife species).

Policy 2.1.2: Pinellas County shall continue to enforce existing ordinances that protect and conserve native ecosystems and wildlife habitat, including habitat for species of conservation concern, from destruction by development activities.

Opinion: The Applicant's consultant, Ardurra, has prepared a Listed Species Study that evaluated the existence and/ or potential for listed species on the Plan Amendment Site. The Listed Species Study include on-site field evaluation as well as review of applicable data bases. The results of the Study are as follows:

- There was no wildlife observed on the site, primarily due to the current golf course activity.
- There were no gopher tortoises observed on the site and there is limited habitat that is suitable for this species.
- There were no wood storks observed on the site; however, portions of the site may contain suitable habitat for wood storks. During the permitting process, the reviewing agencies will evaluate this issue and determine if there is a potential effect on this species as a result of the proposed development.
- There were no kestrels observed on the site and there also were no snag trees observed on the site that could provide habitat.
- There were no Bald Eagles nests observed on the site.
- Based on the FWC Waterbird Colony locator and data base, there are no wading bird colonies on the site or within one mile of the site.
- Based on the FWC Shorebird Colony locator and data base, it is presumed that the development would not have an impact on shorebirds since their nesting sites have been inactive since 2015.
- There were no Eastern Indigo Snake sightings on the site or within one mile of the site.

Based on the data from the Ardurra Study summarized above, in my expert opinion, the Plan Amendment is consistent with this goal, objective and policy.

Policy 2.1.4 Pinellas County shall continue to require that development of a site require maintenance or improvement of existing native vegetative communities and shall continue to require the removal of ecologically undesirable no-native vegetation.

Opinion: The Applicant intends to remove the exotic vegetation from Parcel L, the subject of the Plan Amendment, during the construction phase as required by the *Land Development Code*.

Innisbrook is also committed to removing invasive, non-native plant species from various areas throughout the Resort. This would eliminate the plant from the affected area and prevent further proliferation. Further, Innisbrook will add to the tree canopy by planting additional native hardwood and palm trees throughout the Resort. Innisbrook and Toll Brothers will utilize landscaped berms and buffers to enhance the design aesthetic of the parcel and the overall resort. This will be a phased approach over the next five years.

It should be noted that the Applicant is voluntarily agreeing to these provisions to comply with the intent of this goal, objective and policy and to provide a public benefit to offset the reduction of open space requested by this Plan Amendment. Based on this analysis, in my expert opinion, the Plan Amendment is consistent with this goal, objectives and policies.

Goal 7: Pinellas County will be a leader in environmentally sustainable government operations, a proponent of smart and sustainable growth management practices and will have a strong economy support by sound environmental principles, programs and practices.

Objective 7.2: Pinellas County will plan responsibly for climate change and will educate citizens and stakeholders so that they are partners in determining the County's future.

Policy 7.2.3: In association with the update to the Land Development Code, determine whether there is a need to further amend the Comprehensive Plan and land development regulations to protect public and private coastal infrastructure and investment from the inland advancement of coastal waters, and to coordinate land use planning decisions with the expectations of sea level rise.

Opinion: At this time, Pinellas County has not revised its *Comprehensive Plan* or adopted new land development regulations that address the potential for future sea level rise. However, the Applicant voluntarily proposes several measures to address the potential for future sea level rise as described below.

- All roads within the community will be constructed at or above the current Pinellas County 100-year Base Flood Elevation. The entrance road to the western townhouse area will also include cross culverts to allow for drainage to flow under the road to maintain flood elevations on lands outside of Parcel L.

- The current Pinellas County Coastal Model Base Flood Elevation on the site varies between 10.9' to 11.1'. The current required Minimum Finished Floor Elevation is 12', one foot above the Base Flood Elevation. The National Oceanic and Atmospheric Administration (NOAA) 2050 Intermediate- High scenario at the nearest coast gauge estimates an additional 1.67' of future sea level rise for this area. Therefore, all residential buildings within Parcel L will be designed and constructed to exceed the Minimum Finished Floor Elevation (FFE) by two feet (2') to account for the estimated future sea level rise.

In summary, the Applicant is imposing more restrictive measures on this project than required by the County to comply with the intent of this goal, objective and policy, and to proactively address the potential for future sea level rise within the development as an additional public benefit to offset the reduction of open space requested by this Plan Amendment. Based on this analysis, in my expert opinion, the Plan Amendment is consistent with this goal, objectives and policies.

COASTAL MANAGEMENT ELEMENT

Goal 1: Pinellas County will protect human life, private property and public investment from the effects of hurricanes and other natural disasters.

Objective 1.3: Pinellas County shall restrict development within the coastal storm area, and shall direct population concentrations out of the coastal storm area.

Policy 1.3.1: The coastal high-hazard area (CHHA) shall be the area defined by the *Sea, Lake and Overland Surges from Hurricanes (SLOSH)* model to be inundated from a category one hurricane, as reflected in the most recent *Regional Evacuation Study, Storm Tide Atlas*.

Policy 1.3.5: Pinellas County shall not approve any request to amend the Future Land Use Map (FLUM) to designate parcels of land within the coastal storm area with a FLUM category that permits more than 5.0 dwelling units per gross acre.

Opinion: With regard to the Coastal High Hazard Area, the developer has prepared the Plan Amendment request and designed the community to comply with this goal, objective and policies as reflected in these commitments.

- First, the project does not locate any residential dwellings on lands that are currently designated with the Recreation/ Open Space Plan Category and that are also located within the CHHA. This commitment is consistent with Objective 1.3 to “direct population concentrations out of the coastal storm area” since the new residential development within the CHHA will occur only on lands that are currently designated with a residential plan category.
- Second, the requested Plan Category for the site is Residential Low which limits residential development to a maximum of 5 dwelling units, which is consistent with Policy 1.3.5.
- Third, the entrance road to the western townhouses is located within the CHHA and this road will be designed to the current Base Flood Elevation to allow for evacuation of these townhouse residents, in the event of a major storm event.

All of these commitments are also shown in the accompanying documents in the application to revise the RPD Master Plan.

Based on this analysis, in my expert opinion, the Plan Amendment is consistent with this goal, objectives and policies.

RECREATION, OPEN SPACE AND CULTURE ELEMENT

Goal 1: To administer outstanding countywide recreational, open space and environmental systems that provide, through acquisition, development and maintenance, sufficient resource-based regional parks and environmental lands that are environmentally sustainable, foster environmental stewardship, and enhance the county's economic vitality and the quality of life for residents and visitors.

Objective 1.5: In recognition of the limited amount of available open space remaining within the County, Pinellas County shall prohibit the conversion of dedicated recreation/open space land uses, and encourage the retention of non-dedicated recreation/open space land uses.

Opinion: The Plan Amendment site and all of the recreation/ open space lands within the Innisbrook Resort are privately owned, and, therefore, are not dedicated as recreation/ open space lands. Therefore, the prohibition contained in the first part of Objective 1.5 against changing these lands does not apply to this Plan Amendment.

As shown in **Table 1** of this report, there are 32.625 acres on the Plan Amendment Parcel L that are currently designated as Recreation/ Open Space Plan Category which this Application proposes to change to the Residential Low Plan Category. Also shown on **Table 1** are the ten parcels that are proposed to be changed from various Residential Plan Categories to the Recreation/ Open Space Category and these ten parcels in combination are 21.273 acres in size. Therefore, the net decrease in lands designated as Recreation/ Open Space within the Innisbrook Resort RPD is proposed to be 11.352 acres, a minimal reduction in open space.

The current amount of open space within the Innisbrook Resort is 618.31 acres which comprises 73% of the total Resort site. If this Plan Amendment is approved, the new amount of open space will be 604.80 acres which is 71.5 % of the total Resort site.

The second part of Objective 1.5 encourages the retention of non-dedicated recreation/ open space land uses and this Plan Amendment is consistent with that objective since Innisbrook will still retain 604 acres of recreation/ open space land, if the Plan Amendment is approved. The significant amount of land within Innisbrook Resort in use as recreation/ open space lands reflects the importance of recreation/ open space to the Resort.

Based on this analysis, in my expert opinion, the Plan Amendment is consistent with this goal and objective.

Goal 5: To promote the arts, culture, and historic and archaeological resources within Pinellas county, and their preservation, through public and private investment and by raising awareness of existing facilities and programs.

Objective 5.3: The County shall continue to identify, protect and preserve historic and archaeological resources in Pinellas County including coastal areas. Particular emphasis will be given to increasing the interpretation and appreciation of such resources.

Policy 5.3.9: Pinellas County shall recognize historic and archaeological resources that could potentially be affected by land use and zoning changes.

Opinion: The Applicant has performed a review to determine if there might be any impact on archaeological resources that may exist on the plan amendment site. This review was performed by a registered professional archaeologist and included a review of previous cultural resource studies, evaluation of the environmental setting, a review of the prehistory and history of the site, and field work. This review did not identify any archaeological artifacts and does not recommend further archaeological testing or research of the site. Therefore, the study concluded that the redevelopment of the site as a residential development would not affect any archaeological resources. Based on the archaeological review, in my expert opinion, the Plan Amendment is consistent with this goal, objective and policy.

POTABLE WATER SUPPLY, WASTEWATER, AND REUSE ELEMENT

Goal 1: High quality and affordable potable water will be available to meet the existing and projected demands of Pinellas County utility customers.

Objective 1.1: Pinellas County shall continue to cooperate on a regional level to ensure that adequate and dependable supplies of potable water area available to meet existing and projected potable water demands, and shall coordinate the issuance of building permits and development orders with the availability of potable water. Policies 1.1.1 through 1.1.4 represent the adopted level of service standards for potable water systems serving Pinellas County.

Policy 1.1.3: Pinellas County shall use the following Level of Service when preparing its annual 5-year and 20- year potable water demand projections for the Pinellas County Water Demand Planning Area, which are required by the Master Water Supply Contract to enable Tampa Bay Water to formulate its capital improvement program.

Pinellas County Water Demand Planning Area (Gpcpd)

Year	1990	1994	1995	1997	2000	2005	2010	2015	2020	2025
Gpcpd	150	145	135	125	125	120	120	120	115	115

Opinion: Pinellas County receives its potable water through Tampa Bay Water, the regional water supplier. Tampa Bay Water’s current plan demonstrates its ability to provide water to its customers through 2028 and TBW is currently preparing an update to its plan. Based on a slow growing population in Pinellas County and conservation methods, potable water is available for future growth, including this Plan Amendment. Based on this analysis, in my expert opinion, the Plan Amendment is consistent with this goal, objective and policy.

Goal 2: Wastewater collection treatment, reuse and disposal facilities are available to safely meet existing and future demands in a manner that contributes to water conservation and does not degrade the surrounding natural environment.

Objective 2.1: Pinellas County Utilities (PCU) shall provide the levels of service necessary for proper wastewater treatment, reuse and disposal in order to ensure the protection of tits citizens and the environment and to provide adequate wastewater treatment capacity for all current and projected wastewater facility demands of Pinellas County Utility customers.

Policy 2.1.1: Wastewater flows associated with existing and permitted development cannot exceed the wastewater treatment plant’s permitted design capacity.

Opinion: Based on the data shown in Chapter 2 of the *Potable Water Supply, Wastewater and Reuse Element*, the Plan Amendment site will be served by the William E. Dunn Wastewater Treatment Reclamation Facility located in north County. The Dunn Treatment Facility has a design capacity of 9 million gallons per day and the current demand is 6.41 million gallons per day. Therefore, the Dunn Facility is operating at 71 % of its capacity with capacity for future developments, including the Plan Amendment site. Therefore, based on this analysis, in my expert opinion, the Plan Amendment is consistent with this goal, objective and policy.

SOLID WASTE ELEMENT

Goal 3: Regulate in the most economically feasible cost-effective, and environmentally safe manner, the processing, source reduction, recycling and disposal of solid and hazardous waste in order to protect the public health and safety.

Objective 3.2: The County shall establish a level of service standard for disposal of refuse countywide.

Policy 3.2.1: The level of service standard shall be to dispose of 1.3 tons per person per year.

Opinion: Based on the data shown in Chapter 2 of the *Solid Waste and Resource Recovery Element*, the County's Waste-to energy plant's capacity is 1,149,750 tons per day. The current usage at the waste-to-energy plant in the most recent year was 906,489 tons per day. Therefore, the waste-to-energy plant is operating at approximately 79% of its capacity and can accommodate this new development.

Based on this information, the waste-to-energy plant is operating with excess capacity that can handle future growth, including this Plan Amendment site. Therefore, based on this analysis, in my expert opinion, the Plan Amendment is consistent with this goal, objective and policy.

SURFACE WATER MANAGEMENT ELEMENT

Goal 1: Surface waters shall be managed to provide flood protection for the citizens of Pinellas County to preserve and enhance the water quality of receiving water bodies, and for the purposes of natural resource protection, enhancement and restoration, plant and wildlife diversity, and estuarine productivity.

Objective 1.2: The County shall apply its stormwater management concurrency management provisions at the time of site plan review, and utilize the following level-of-service standards to support the goals of the Surface Water Management Element.

Policy 1.2.1: The following level of service standards are adopted for major drainage projects to support stormwater management goals:

Pinellas County Level-of-Service Standards for Stormwater Management
All applicable federal, state, and local regulations (as indicated in the Regulatory Framework section of the Surface water Management Element) relating to flood control, stormwater treatment and wetland protection, shall continue to be met in public and private project design.
The twenty-five year storm design standard shall confine the runoff from a 25 year, 24 hour rainfall event within drainage channel banks, or within designated twenty-five year floodplains in order to protect human life and minimize property damage.
The one-hundred year storm design standard shall protect homes and commercial buildings against flooding by a 100 year, 24 your rainfall event.
Preference shall be given to stormwater management options which restore floodplains and remove obstructions from floodways.

Opinion: The Applicant is aware of the County's stormwater design standards and will comply with these regulations which will be demonstrated during the construction and permit review process. Based on this analysis, in my expert opinion, the Plan Amendment site is consistent with this goal, objective and policy.

HOUSING ELEMENT

Goal 1: Support the provision of decent, safe and sound housing in a variety of types, sizes, locations and costs to meet the needs of current and future residents of unincorporated Pinellas county and those county residents that benefit from housing initiatives under the authority of the Board of County Commissioners, regardless of race, color, religion, sex, national origin, handicap or familial status.

Objective 1.1: Support the provision of dwelling units in a variety of types, locations and costs so that housing supply matches the projected housing need in Pinellas County while encouraging development that is consistent with the Future Land Use and Quality Communities Element.

Opinion: If approved, the Plan Amendment would allow the development of housing in the growing North Pinellas County area in a neighborhood that is very desirable. The proposed single family detached and townhouse development is located within Innisbrook Resort which currently has both single family detached and multifamily styles of development, resulting in the proposed types of residential units being compatible with the existing development. Therefore, based on this analysis, in my expert opinion, the Plan Amendment is consistent with this goal and objective.

ECONOMIC ELEMENT

Goal 1: To facilitate a strong and robust local economy that provides growth opportunities for existing businesses, attracts new high-wage primary employers and promotes a diverse ranges of industries through innovative, sustainable methods that, in a responsible manner, enhance the County's vitality and the quality of life for residents and visitors.

Objective 1.7: To continue Pinellas County's strong history of tourism and recognition as one of Florida's prime tourist destinations.

Policy 1.7.1: Pinellas County will continue to promote and support tourism and tourist-related businesses, as tourism is one of the County's largest economic industries.

Policy 1.7.5: Pinellas County will promote and support local parks, recreation and cultural amenities, environmental lands, entertainment establishments, and retail goods and service providers as important quality of life components and workforce and business attractors.

Opinion: Innisbrook Resort has operated as a successful tourist attraction since its initial development in 1968, for over 53 years. Since 1990, the Copperhead Golf Course has been the host of the PGA Tour's Valspar Championship. The most recent pre-pandemic attendance at the Valspar Championship in 2019 was 108,000 persons, representing a major tourist event in Pinellas County.

Visit St. Pete/ Clearwater, the County's tourist agency, commissioned Destination Analysts to conduct an Economic Impact Study of the PGA Tour's Valspar Championship for the 2021 event. The Economic Impact Study estimated that the total economic impact to Pinellas County from this event was \$56 million, 651 jobs were supported, a total of \$ 1.97 million of taxes were generated for the County, and significant donations to local charities. The continued viability of Innisbrook Resort and its ability to host the Valspar Championship is a public benefit due to the creation of a direct economic impact of \$56 million dollars for this annual event.

If approved, the Plan Amendment will allow Innisbrook Resort to adapt one of its courses to remain competitive with other high-end golf resorts, while retaining four golf courses functioning as the predominant recreational activity at the resort.

Based on this analysis, in my expert opinion, the Plan Amendment is consistent with this goal, objective and policies.