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July 23, 2019

VIA ELECTRONIC AND US MAIL

Teri Hasbrouck, CPM
Brownfield Land Recycling Program
County of Pinellas
13805 58th Street North, Suite 1-200
Clearwater, FL 33760

Re: Request for Brownfield Area Designation - Restoration Bay
11832 66th Ave, FL
Parcel ID No.: 33-30-15-00000-240-0100

Dear Ms. Hasbrouck:

As you know, Cobb Cole has the pleasure of representing TTGC, LLC (the "Applicant") with respect to redevelopment of the property located at 11832 66th Avenue in Seminole, Florida (the "Property"). A figure depicting the approximate location of the Property is attached hereto as Exhibit A. Please accept this letter as the Applicant's formal request to have Pinellas County designate the Property as a Brownfield Area in accordance with Section 376.80, Florida Statutes. In addition, enclosed herein please find a completed Pinellas County Brownfields Redevelopment Program Individual Application for Brownfield Designation with attachments.

The Applicant is interested in redeveloping the Property for residential, recreational, and conservation uses focused around the natural resources present on the property. However, the redevelopment of the Property is complicated by environmental issues associated with the historic use and operation of the Property as a golf course. The Applicant is interested in redeveloping the Property using the Florida Brownfields Redevelopment Program to facilitate the cleanup of any environmental issues.

Under Section 376.80(2)(c), Florida Statutes, a local government designates a property as a Brownfield Area if the applicant meets the applicable criteria provided for in the statute. A description of said criteria and an analysis of how the Applicant meets the same is provided below.

I. Section 376.80(2)(c)1, Florida Statutes. A person who owns or controls a potential brownfield site is requesting the designation and has agreed to rehabilitate and redevelop the brownfield site.

The Applicant, who is the owner of the Property, is requesting the Brownfield Area designation. As the owner of the property, the Applicant plans to enter into a Brownfield Site Rehabilitation Agreement with the Florida Department of Environmental Protection in order to complete site rehabilitation and redevelopment of the brownfield site.

II. Section 376.80(2)(c)2, Florida Statutes. The rehabilitation and redevelopment of the proposed brownfield site will result in economic productivity of the area, along with the creation of at least 5 new permanent jobs at the brownfield site that are full-time equivalent positions not associated with the implementation of the brownfield site rehabilitation agreement and that are not associated with redevelopment project demolition or construction activities pursuant to the redevelopment of the proposed brownfield site or area. However, the job creation requirement does not apply to the rehabilitation and redevelopment of a brownfield site that will provide affordable housing as defined in s. 420.0004 or the creation of recreational areas, conservation areas, or parks.

The redevelopment of the Property for residential uses will include the creation of recreational areas, conservation areas, and/or park areas. As such, the job creation requirement does not apply to the proposed redevelopment. However, the Applicant anticipates that the redevelopment of the Property will result in the creation of more than 10 new permanent, full-time equivalent jobs for association management, home sales, and maintenance of the new residential community, which will not be associated with redevelopment project demolition or construction at the Property.

III. Section 376.80(2)(c)3, Florida Statutes. The redevelopment of the proposed brownfield site is consistent with the local comprehensive plan and is a permissible use under the applicable local land development regulations.

The proposed Future Land Use categories associated with the redevelopment are Residential Low, and Preservation. The proposed designations allow for the development of a residential subdivision while preserving sensitive natural lands and habitat. As a part of the proposed development, the Applicant is dedicating roughly 6 acres for public open space uses, which includes a Greenscape Corridor which connects the Boca Ciega Millennium Park all the way to Boca Ciega Bay. The installation of educational signage, pedestrian access walkways, and canoe/kayak launches can be utilized to encourage individuals to observe and understand the importance of protecting natural spaces. The Property, located next to a 187-acre resource-based park, is the perfect opportunity for smart development that allows for an interconnected wildlife and habitat corridor while providing for the continued growth of Pinellas County.

The Property's current Future Land Use categories are Recreation/Open Space and Preservation. These land use designations were meant to depict the areas of the County that are now used, or appropriate to be used for open space and recreational purposes and in this instance, were specific to the previous Golf Course use (now terminated). Concurrent with this Brownfield Area designation request, there are pending, concurrent applications for FLUM and zoning designation amendments to coincide with the proposed redevelopment of the Property for residential, open space, recreation, and conservation uses. Consequently, upon concurrent approval of all related applications, the Brownfield designation will be consistent with the current Future Land Use category.

Redevelopment of the Property for residential use requires an amendment to the Future Land Use Designation and Zoning Designations applicable to the property. The proposed Future Land Use is Residential Low. The property's current Future Land Use is not compatible with the current zoning on the Property, which allows for large residential lots associated with agricultural development. The proposed Future Land Use change and rezoning will clarify the permitted uses and ensure a consistent application of the regulations on the Property.

Policy 1.16.2 of the Pinellas County Land Development Code states that "[t]he Pinellas County Brownfield Program will work with public and private entities, landowners and purchasers to assess the impacts of previous site uses and to facilitate cleanup of eligible properties in order to return them to a productive economic purpose and desirable community use." While the Property's former use as a golf course was considered a viable open space use under the Comprehensive Plan, the golf course has since gone out of operation and is no longer economically productive. If left undeveloped, the property may fall into a state of overgrowth and disrepair that will negatively affect the overall character of the surrounding area. Further, the landscaping used on the former golf course included non-native vegetation, and the continued growth of these species may result in impacts to local habitat and wildlife. The Applicant has committed to providing native vegetation throughout the redevelopment to ensure a healthy and vibrant natural corridor. The Applicant further proposes to protect the Boca Ciega waterfront corridor through appropriate limitation of permissible passive uses therein.

The operation of a golf course can have significant impacts to local waterbodies, groundwater, and soil resulting from the application of pesticides and herbicides in large quantities. The contaminants found in pesticides and herbicides can negatively affect human health and safety, impact water quality, and disrupt natural food chain processes. As a part of the redevelopment, any environmental impacts resulting from the former golf course operation will be assessed and remediated to the standards required by the Florida Department of Environmental Protection. In addition, the proposed layout of the ponds and swales will provide an opportunity for stormwater treatment before the water reaches Boca Ciega Bay, which will further improve water quality in the area.

The Property's current zoning is Residential Agricultural, with a small portion of the property designated as Aquatic Lands. The proposed zoning includes is to a Residential Planned

Development (RPD). The proposed residential redevelopment includes a density of less than 2.5 units per acre, which is less than the maximum allowed of 5 units per acre, and is in line with the 273-lot plat approved for the Property before its use as a golf course. This density is less than what is developed in adjoining subdivisions and provides for greater open space and recreational areas as part of the development.

The proposed redevelopment of the former golf course into a residential subdivision will help provide for the continued growth by converting disused land into new living opportunities for residents. The proposed development preserves approximately 39% of the property for recreational and open space uses, in addition to the open space areas that will be contained within the development area itself. This Property presents the opportunity to remediate potential impacts resulting from its former use as a golf course while continuing to provide open space recreational opportunities to residents through the use of the planned nature boardwalks and conservation areas. The planned development and associated open space preservation meets Objective 3.2 of the Pinellas County Comprehensive Plan, which states that Pinellas County shall “ensure that [natural] resources are successfully integrated into the urban environment such that the overall function and viability of these areas is maintained, or where practical, enhanced or restored.”

IV. Section 376.80(2)(c)4, Florida Statutes. Notice of the proposed rehabilitation of the brownfield area has been provided to neighbors and nearby residents of the proposed area to be designated pursuant to paragraph (1)(c), and the person proposing the area for designation has afforded to those receiving notice the opportunity for comments and suggestions about rehabilitation. Notice pursuant to this subparagraph must be posted in the affected area.

The Applicant is committed to providing proper notice and facilitating public involvement in the brownfield area designation process and the redevelopment of the Property. The Applicant will assist the County in complying with the required notice provisions for the Brownfield Area, including notifying neighbors and stakeholders, providing the County with any and all comments and suggestions it receives regarding site rehabilitation, posting the notice at the proposed Brownfield Area, and reimbursing the County with all costs incurred in complying with the notice requirements.

V. Section 376.80(2)(c)5, Florida Statutes. The person proposing the area for designation has provided reasonable assurance that he or she has sufficient financial resources to implement and complete the rehabilitation agreement and redevelopment of the brownfield site.

Information regarding the Applicant’s financial resources is attached to the enclosed Application. As an affiliate of a successful, state-wide business with a history of responsible redevelopment, the Applicant has sufficient financial resources to implement and complete site rehabilitation and redevelopment of the Property.

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If you have any questions or comments regarding the Applicant's request, please do not hesitate to contact me. We look forward to working with Pinellas County on this matter.

Sincerely,



Michael O. Sznajstajler

Direct Dial (386) 323-9222
Michael.Sznajstajler@CobbCole.com
Fax (386) 944-7963

Enclosure

cc: Ron Carpenter, MSRE
Joel Tew, Esquire
(each with enclosure)

Exhibit A

Property Description



EXHIBIT A

LEGAL DESCRIPTION: PER COMMITMENT FOR TITLE INSURANCE
PREPARED BY OLD REPUBLIC NATIONAL TITLE INSURANCE COMPANY,
FILE NUMBER 12062805 JJS, EFFECTIVE DATE JULY 19, 2012 at 5:00PM.

TIDES GOLF COURSE (PARCEL 1)

Commence at the Northwest corner of Lot 12, Block 35 of said Section B Seminole Estates for a Point of Beginning, proceed South 01°08'22" West, 391.13 feet; thence South 88°51'38" East, 10.00 feet; thence South 01°08'22" West, 150.00 feet; thence South 05°42'12" East, 121.02 feet; thence South 01°08'22" West, 30.00 feet; thence South 88°51'38" East, 4.50 feet; thence South 01°08'22" West, 30.00 feet; thence South 05°48'04" East, 151.11 feet; thence South 01°08'22" West, 146.27 feet; thence South 00°47'39" East, 30.00 feet; thence North 89°12'21" East, 28.70 feet; thence South 00°47'39" East, 30.00 feet; thence South 00°00'28" East, 120.00 feet; thence North 89°59'32" East, 19.27 feet; thence South 00°00'28" East, 58.59 feet; thence South 11°46'19" West, 51.00 feet; thence South 83°24'57" East, 132.86 feet; thence 50.28 feet along the arc of said curve to the right radius 736.67 feet, chord South 08°29'38" West, 50.27 feet; thence North 88°50'33" West, 5.47 feet; thence South 547.01 feet; thence 377.26 feet along the arc of a curve to the right, radius 317.02 feet; chord South 34°05'32" West, 355.39 feet; thence South 68°11'02" West, 144.02 feet; thence North 89°57'30" West, 134.22 feet; thence South 68°11'02" West, 33.27 feet; thence 106.22 feet along the arc of a curve to the left, radius 340.00 feet, chord South 59°14'01" West, 105.80 feet; thence North 00°08'29" East, 17.76 feet; thence along the government meander line North 65°03'45" West, 850.03 feet; thence North 45°03'45" West, 790.22 feet; thence North 00°18'27" East, 1464.36 feet; thence South 88°47'05" East, 1221.57 feet; thence 182.85 feet along the arc of a curve to the left, radius 550.00 feet, chord South 79°18'51" East, 182.01 feet; thence South 88°50'33" East, 324.45 to the Point of Beginning.

AND (PARCEL 2)

A portion of Government Lot 2, Section 33, Township 30 South, Range 15 East, Pinellas County, Florida, being described as follows:

Commence at the Southwest corner of the Southeast 1/4 of the Northwest 1/4 of said Section 33 for a Point of Beginning; said Point of Beginning being on the Northern boundary line of Government Lot 2, thence South 00°18'27" West, 124.93 feet; thence South 46°00'00" West, 270.00 feet More or Less to Point "A", said Point "A" being on the approximate Mean High Water Line; thence return to the Point of Beginning; thence North 88°50'33" West, 128.30 feet; thence South 46°00'00" West, 170.00 feet More or Less to a point on the approximate Mean High Water Line, thence meandering in a Southeasterly direction along the approximate Mean High Water Line 210 feet More or Less to Point "A" as previously described. Government Lot 2 together with any accretions to Government Lot 2, which lies within the following described tract: From the Southeast corner of Section 33, Township 30 South, Range 15 East, run West along

EXHIBIT A

Section line, 1320 feet; thence South 43°30'00" West, 1450.00 feet; thence North 45°00'00" West, 1950.00 feet to a Point of Beginning; continue North 45°00'00" West, 1850.00 feet (deed) (calculated 1882.82 feet); thence North 46°00'00" East 1450.00 feet; thence Southeasterly following the Government meander line of Boca Ciega Bay to a point where Government Lot 2 and Government Lot 3 intersect; thence South 36°26'49" West, 1813.09 feet, more or less to the Point of Beginning.