



## LOCAL PLANNING AGENCY (LPA) STAFF REPORT

**Case Number:** FLU-25-04

**LPA Public Hearing:** September 10, 2025

**Applicant:** Twin City MHC, LLC

**Representative:** Todd Pressman, Pressman & Associates, Inc.

**Subject Property:** Approximately 8.94 acres at 10636 Gandy Boulevard in unincorporated St. Petersburg

**Parcel ID(s):** 17-30-17-00000-340-0800



### **REQUEST:**

Future Land Use Map (FLUM) amendment from Residential Urban (RU) (8.54 acres) and Commercial General (CG) (0.4 acre) to Residential Medium (RM). A companion Zoning Atlas amendment (Case No. ZON-25-02) is also proposed.

### **LOCAL PLANNING AGENCY (LPA) RECOMMENDATION:**

The LPA finds the proposed Future Land Use Map amendment **inconsistent** with the Pinellas County Comprehensive Plan and recommends **denial** by the Board of County Commissioners (vote 4-2).

### **Development Review Committee (DRC) RECOMMENDATION:**

- **Staff recommends** that the LPA find the proposed Future Land Use Map amendment **inconsistent** with the Pinellas County Comprehensive Plan, based on this report.
  - **Staff further recommends** that the LPA recommend **denial** of the proposed Future Land Use Map amendment to the Pinellas County Board of County Commissioners.
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## **SUMMARY REPORT**

The Development Review Committee reviewed this application on August 11, 2025. Staff's summary discussion and analysis follows:

The subject property consists of one parcel totaling 8.94 acres located at 10636 Gandy Boulevard North, on the south side of the roadway about 400 feet west of the intersection with San Martin Boulevard and about a mile west of the Gandy Bridge. Much of the surrounding area is within the City of St. Petersburg. The northern 0.4-acre 'panhandle' portion of the property closest to Gandy Boulevard is designated Commercial General (CG) on the Future Land Use Map (FLUM) while the remaining 8.54 acres are designated Residential Urban (RU). The existing use on the property is the Twin City Mobile Home Park (MHP). The master plan on file for Twin City indicates 103 mobile home spaces and three (3) apartment units. The MHP has flooded heavily multiple times during recent storm events and there are approximately 24 mobile home units that remain occupied.

Twin City was established in the 1950s prior to the County's zoning code and is considered nonconforming. If redeveloped, the existing FLUM categories would allow a maximum of 64 residential units (the RU category allows a maximum of 7.5 units per acre and the CG category does not allow residential uses in this location). The applicants desire to redevelop the property with multifamily housing at a higher density than is allowed by the RU category. A FLUM amendment to Residential Medium (RM) for the entire property is proposed. With a maximum density of 15.0 dwelling units per acre, RM would allow up to 134 residential units, subject to site plan review. A zoning change from Residential Mobile/Manufactured Home to Multi-family Residential would also be required for the proposed redevelopment, which the applicants are requesting via companion Zoning Case No. ZON-25-02.

### **Surrounding Uses, Land Use Designations and Zoning**

The subject property is surrounded by a variety of adjacent uses. To the north across Gandy Boulevard is an apartment complex within the City of St. Petersburg and to the northeast along the south side of Gandy (also within the City) are a retail strip center and car wash. The remaining adjacent properties are all unincorporated and include single family homes to the east, boat repair and storage to the southeast, the Derby Lane (former dog racing facility) property to the south, and a motel, a communications tower, and a retail establishment to the west. Importantly, the waters of Tampa Bay and its connecting wetlands are relatively close to the subject property, particularly to the south. In terms of FLUM categories, RU is predominant to the east, CG is to the west, Commercial Recreation (CR) is to the south, and the City of St. Petersburg has its own designations to the north and northwest. In addition, the adjacent boat repair and storage facilities are designated Employment (E). In terms of zoning, R-4 residential covers the single-family homes to the east, E-2 employment covers the boat-related uses to the southeast, C-2 commercial covers the Derby Lanes property to the south as well as the commercial uses to the west, and City designations exist to the north and northeast.

### **Flood Risk**

The subject property is highly vulnerable to flooding and storm surge. It is located within the 25-year coastal floodplain and entirely within the Coastal High Hazard Area (CHHA), which is the area defined by the Sea, Lake and Overland Surges from Hurricanes (SLOSH) model to be inundated by a category one hurricane, as reflected in the most recent Regional Evacuation Study, Storm Tide Atlas. It is also within the Coastal Storm Area (CSA), which includes the CHHA in addition to any isolated elevated areas that are surrounded by the CHHA (where evacuation would require crossing the CHHA). Correspondingly, the property and the surrounding area is within Hurricane Evacuation Zone A. The subject property's vulnerable location within the CSA/CHHA is critically important to this FLUM amendment request. The Pinellas County Comprehensive Plan restricts (re)development within and directs population concentrations out of the CSA. Toward this end, the Plan explicitly states that '*Pinellas County shall not approve any request to amend the FLUM to designate parcels of land within the CSA with a FLUM category that permits more than 5.0 dwelling units per gross acre*' (Coastal Management Policy 2.1.3). The property's existing RU FLUM category permits up to 7.5 dwelling units per gross acre,

so it already permits a higher residential density than what would be allowed from any density increase request in the CSA. The RU category has been in place on the subject property for decades and is considered 'grandfathered'. The requested RM category would allow up to 15.0 units per acre. This is double what the existing RU category allows and triple what the Comprehensive Plan permits for any FLUM amendment in the CSA. It is important to note that any redevelopment of the property will be subject to meeting Pinellas County stormwater management requirements and floodplain mitigation.

Information provided with the application states that the proposed development intends to use existing infrastructure and construct a stormwater pond (the existing MHP predates onsite stormwater requirements). Per Pinellas County Public Works, the stormwater infrastructure in the area has a documented history of failing during small and larger rainfall events. This raises the question as to how the existing infrastructure can be effectively utilized with any increase in impervious surface area. Importantly, the Comprehensive Plan restricts public expenditures that subsidize (re)development in the CSA. This is based on Section 163.3177(6)6., Florida Statutes, which requires that local governments limit public expenditures that subsidize development in Coastal High Hazard Areas.

#### Transportation and Service Impacts

Comparing the current development potential of the subject property under the existing RU FLUM designation with that of the proposed RM designation, the proposal could generate approximately 35 additional PM peak hour vehicle trips on Gandy Boulevard, a principal arterial roadway. In this location, Gandy Boulevard is operating at a peak hour level of service (LOS) F with a volume to capacity (V/C) ratio of 1.27. The roadway is considered a deficient facility at this location and mobility mitigation-type improvements may be required as determined during site plan review.

The subject property is within the City of St. Petersburg's wastewater treatment area and water supply service area. The proposal could increase demand on potable water supplies by 14,000 gallons per day; and on wastewater treatment facilities by approximately 10,500 gallons per day. The City has indicated that they review capacity availability at the time of site plan submittal. In reference to solid waste, the proposal could increase the amount of solid waste generated by approximately 47.48 tons per year and could vary depending on dwelling unit sizes.

#### Alternative Options to Increase Density

The subject property is not eligible to utilize the State's Live Local Act due to its residential zoning. To be eligible for the Live Local Act, a property must be zoned commercial, industrial, or mixed use.

The applicants have not stated an intent for the proposed development to include affordable units or that any affordable housing incentives will be sought. Because of the property's location within the CSA, it is not eligible for the County's affordable housing density bonus.

Section 403.892, Florida Statutes allows a density bonus of up to 35 percent for qualifying projects that install and utilize graywater reuse systems, without restriction for vulnerable locations. Based on the existing RU FLUM category, that would allow up to 86 residential units on the subject property. The applicants, through their representative, were advised of this option but indicated a desire to continue to seek additional density via the requested FLUM amendment. Notably, the graywater density bonus could also be applied under the proposed RM category. That would result in a maximum of 181 residential units on the subject property.

#### Resident Relocation

Pinellas County Code Chapter 42 Article X mandates the Mobile Home Transition Program, which implements the requirements of Section 723.083, Florida Statutes regarding determination that adequate mobile home parks or other suitable facilities exist for the relocation of the mobile home unit owners residing on the subject property. All mobile homes on the subject property suffered repeated substantial flooding damage during recent storm events. Federal regulations require elevating homes that receive substantial damage in vulnerable areas to prevent similar damage from future storms. Elevating the

homes on the subject property would be expensive and, due to age and prior damage, many would not survive the process. Any new homes placed on the property would also have to be elevated to protect them from future storm damage.

The applicants have provided information on the status of the MHP residents and their plans for them. Over the past several months, the park owners and Pinellas County have been working to assist mobile home residents with relocation from the subject property. The applicants indicate that most homes are uninhabitable following the 2024 hurricane impacts. The County is utilizing State funding to provide alternative rental housing for the residents. At the time of this writing, 51 residents have applied with the County on the alternative housing program. Of those, 42 were approved and 34 assisted with relocation expenses and rent payments for up to 12 months. The other nine are in budgeting, waitlist, or application review. Per the applicants, a combination of evictions and condemnation proceedings will likely be used to remove any remaining residents due to the condition of the homes and unpaid rents. Further, the applicants contend that several homes are currently occupied by squatters and unauthorized persons.

### Conclusion

The proposed FLUM amendment is clearly inconsistent with the Pinellas County Comprehensive Plan, particularly Coastal Management Policy 2.1.3, and Staff cannot support it. Per Section 163.3194 (1)(a), Florida Statutes, after a comprehensive plan, or element or portion thereof, has been adopted in conformity with state law, all development undertaken by, and all actions taken in regard to development orders by, governmental agencies in regard to land covered by such plan or element shall be consistent with such plan or element as adopted. The Plan outright prohibits the requested density increase in the CSA and directs population concentrations outside of such storm vulnerable areas. Population increases within the CSA would in turn impact storm shelter demand and hurricane evacuation times. The request would be precedent setting for others to follow.

While the subject property would benefit from redevelopment, the current RU FLUM category would allow up to 64 newly constructed units, which is more than the maximum 5.0 units per acre (45 units) the Comprehensive Plan permits for FLUM changes in the CSA. In addition, the property developer could utilize the available graywater density bonus to increase the maximum number of units to 86, the equivalent of 9.6 units per acre. Multifamily development can be considered appropriate for the subject property based on compatibility with surrounding uses but needs to be limited to the number of residential units currently allowed due to its highly vulnerable coastal location.

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### **SURROUNDING ZONING AND LAND USE FACTS:**

	Land Use Category	Zoning District	Existing Use
<b>Subject Property:</b>	Residential Urban (RU) Commercial General (CG)	RMH	Mobile Home Park
<b>Adjacent Properties:</b>			
<b>North</b>	City of St. Petersburg	City	Apartments, Retail
<b>South</b>	Commercial Recreation (CR)	C-2	Derby Lanes
<b>East</b>	Residential Urban (RU) Employment (E)	R-4, E-2	Single Family, Boat Repair/Storage
<b>West</b>	Commercial General (CG)	C-2	Retail, Motel, Tower

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## **IMPLEMENTATION OF THE PINELLAS COUNTY COMPREHENSIVE PLAN**

Staff finds that the proposed amendment is inconsistent with the following adopted objective, policies and strategy of the Pinellas County Comprehensive Plan:

### **COASTAL MANAGEMENT ELEMENT**

Objective 2.1: Restrict (re)development within and direct population concentrations out of the Coastal Storm Area (CSA).

Policy 2.1.2: Establish the "Coastal Storm Area" (CSA) to include the Coastal High Hazard Area (CHHA) defined as areas projected to be inundated from category one hurricane storm surge in the most recent "Sea, Lake, and Overland Surges from Hurricanes" (SLOSH) model or most recent storm surge model compliant with applicable State Statutes.

- All land connected to the mainland of Pinellas County by bridges or causeways;
- Isolated areas projected to be inundated by storm surge from a Category two hurricane or above by the SLOSH or most recent surge model that are surrounded by the CHHA or by CHHA and a body of water; and
- All land located in Coastal "A" zones, "V", "VE", or "V1-30" velocity zones designated by the Federal Emergency Management Agency (FEMA) flood insurance rate maps.

Policy 2.1.3: Pinellas County shall not approve any request to amend the Future Land Use Map (FLUM) to designate parcels of land within the CSA with a FLUM category that permits more than 5.0 dwelling units per gross acre.

Policy 2.1.4: Restrict public infrastructure expenditures that subsidize (re)development in the CSA.

### **FUTURE LAND USE ELEMENT**

Strategy 3.1.3.2: Implement a density bonus for Affordable Housing Developments (AHDs) in the Land Development Code consistent with the Countywide Plan. The density bonus shall not be allowed for AHDs located within the CSA.

Policy 6.3.1: Limit (re)development in hurricane velocity zones and flood-prone areas.

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## **COUNTY DEVELOPMENT REGULATIONS**

Approval of this request does not ensure that the site can meet County development regulations, which apply at the time of site plan review.

**PROPOSED BCC HEARING DATE:** October 21, 2025, at 6:00 p.m.

**CORRESPONDENCE RECEIVED TO DATE:** None Received.

**PERSONS APPEARING AT THE LOCAL PLANNING AGENCY HEARING:** No one appeared.

**ATTACHMENTS:** Case Maps, Impacts Analysis, Transportation Analysis, Application