



November 20, 2020

Glenn Bailey, AICP
Zoning Manager
Pinellas County Planning & Zoning
440 Court Street, 4th Floor
Clearwater, FL 33756

RE: Review of Proposed Amendments to the Pinellas County Land Development Code Chapters 138 and 154 and Adoption of Transportation Design Manual

Dear Glenn:

Thank you for forwarding the proposed amendments to the Pinellas County Land Development Code for review for consistency with the Countywide Rules. We commend the County for its thoughtful and detailed approaches to the proposed amendments, especially where the Land Development Code addresses the standards set forth by the Rules.

The proposed amendments to the Land Development Code are consistent with the Countywide Rules. We found only a few minor issues in need of clarification:

- The definitions for “personal service” and “business service” in Section 138-356 are respectively similar to, but differently named from, those for “office service/office support use” and “personal/business service use” in Section 138-1. The nomenclature should be internally clarified.
- In Section 138-3254, a personal service use is only permitted as an accessory to a primary use in the E-1 zoning district, with no size limitation specified. In the corresponding Employment category in the Rules, personal service/office support is limited to three contiguous acres. While the required relationship to a primary use can be expected to keep the size of a personal service use well below that threshold, a size limit should be clarified.
- In reference to Section 138-352(m), staff recommends amending this section to directly reference Countywide Rules section 5.2.1.1.1(E.2), which addresses the determination of remnant use and density/intensity for mixed uses as they pertain to the Transfer of Development Rights. Currently, this specific point is missing in this section of the Land Development Code.

The proposed Transportation Design Manual is not subject to consistency with the Countywide Rules. However, as a courtesy, it was forwarded to MPO staff for their review, and the following recommendations were provided. If you have any questions about these recommendations, we will be happy to connect you to MPO staff for further guidance or clarification:

- References to the Bicycle Pedestrian Master Plan in Sections 4.2.3.1 and 4.2.3.2 should refer to the Forward Pinellas Active Transportation Plan.
- Staff suggests considering a preference for a buffer in between suggested sidewalks and roadway where posted speeds exceed 35 miles per hour (mph) in Chapter 6.
- In Chapter 7, staff suggests considering a minimum width preference for bike facilities, if it is a striped bike lane, even if following the Florida Department of Transportation (FDOT) Design Manual (FDM).
- Similarly for Chapter 8, staff suggests considering a minimum width preference for trail and shared-use paths, even if following the FDM.
- Staff suggests re-evaluating Section 9.2 on the basis that many jurisdictions are currently re-evaluating their design speeds and favoring lower thresholds across various functional classifications. A speed of 45 mph is generally considered high for the safety of the various roadway users on certain types of facilities. Additionally, the requirement that design speeds 'shall not be less' than those posted in Table 9-1 poses potential roadblocks for design projects that might be of high quality, but are seeking to calm traffic on roadways that are not intended for high-speed/regional traffic.
- Similar to the comments above, in Section 9.4, the requirement that 'lane widths for any County roadway shall not be less than' the standards set forth in Table 9-2, particularly for collector roadways and minor/principal arterial roadways, have similar implications in potentially limiting certain projects. Staff recognizes that sections of US Highway 19 have recently been and are being designed with an 11 foot travel lane as becoming a more standard practice. As such, staff suggests adjusting this section to allow for more flexibility.

If you have any questions, please feel free to call me at 424-3351.

Sincerely,

A handwritten signature in cursive script that reads "Linda Fisher". The signature is written in black ink on a white background.

Linda Fisher, AICP
Principal Planner