

Reply to: Bradenton

May 6, 2019

RESPONSE TO PLANNING COMMENTS

PLN1902-0234

As indicated in the narrative, an amendment to the plan is considered a major policy decision by the Board of County Commissioners and any amendment to the FLUM shall occur only where it is determined that growth and development patterns initially sought by Manatee County are no longer appropriate. The burden is on the applicant to demonstrate the necessity of an amendment and how the amendment will be compatible with adjacent existing uses.

RESPONSE: Per email from Margaret Tusing dated 5.6.19, no response is necessary to this comment.

Based on the following maps, the areas outlined in blue can be developed with the existing FLUCs with non-residential uses up to 150,000 square feet (excluding industrial). Please explain in more detail how the mixed use FLUC would create a more desirable land use pattern in this area than the existing FLUCs. Please further address how the MU FLUC is more compatible with the surrounding area than the existing residential FLUCs. Please explicitly explain why Mixed Use FLUC designation is necessary for this project.



For purposes of responding to the above comment, the identified areas have been addressed separately.

RESPONSE: As you correctly state in your comment, industrial is not an allowable land use under the current FLUC's of RES-3 and RES-6. As clearly indicated in the requested specific property limitation language, the applicant requests that a portion of the site be made available for this land use. Further, as illustrated, the location of future non-residential development is limited to the area identified in the RES-6 area. In reviewing the environmental information provided with the application, it is clear this is an area that may not be the most desired for non-residential development and certainly would not support the amount of non-residential identified. For your reference, the FLUCCS Code for each area is also provided. The quadrant identified as appropriate for commercial under the current FLUC contains wetlands as well as streams and a significant hardwood area. Final design of the land, with the benefit of MU, would allow the landowner to consider these environmental areas for preservation. MU does not require adherence to Commercial Locational Standards which would allow non-residential development, if deemed appropriate, to be internalized.



FLUCCS Code	Description
211	Improved Pastures
434	Hardwood - Conifer Mixed
510	Streams and Waterways
534	Reservoirs less than 10 Acres
630	Wetland Forested Mixed
640	Vegetated Non-Forested Wetlands



RESPONSE: The area identified in the graphic above, presumes both the construction of 49th Avenue East and the specific location of this roadway. The Comprehensive Plan, in defining Commercial Locational Criteria, specifically states that the Roadway Functional Classification Map must be used (see Land Use Operative Provisions contained in Element 2, Future Land Use Element). 49th Avenue East is not identified on this map as it has yet to be designed or constructed. It is, however, identified on the Future Traffic Circulation Functional Classification Map. At such time as the road is built, it could be used for determining compliance with Commercial Locational Criteria. Further, the subject property may not have direct access to a future 49th Avenue East and would therefore be required by the Comprehensive Plan to take access only to 29th Street East as there must be access to at least one roadway classified as collector or higher. For these reasons, the flexibility provided by the MU FLUC and the ability to design the site without locational restrictions is beneficial to the surrounding area.

Please identify, in general, the areas proposed for industrial/commercial/residential so staff can evaluate the potential impacts on the adjacent residential areas.

RESPONSE: The applicant has not undertaken any land planning exercises at this early stage of entitlement procurement. The application includes a specific property condition that would prohibit industrial land uses in the western 100 acres. An analysis of specifically proposed land uses and their locations would occur at the time of rezoning and development plan approval. The consideration of a FLUM amendment must include all possible land uses without regard to specific project design.

How are you planning to integrate the uses to minimize the cost of infrastructure and decrease the dependence on vehicles (Page 4 of narrative)?

RESPONSE: The narrative contained the following statements: “Interestingly, the current thoughts on land use patterns are more historic, from a time when most development occurred organically without the constraints of government regulation. What began as a way to protect society from adverse impacts of different land uses evolved into a complete separation of land uses. The result of that separation is a society wholly dependent on vehicles and escalating costs of infrastructure. MU is one of the few FLUC’s available that allow and encourage land use integration.” The statement recognized that separating residential development from employment and retail opportunities has been the recent practice and the land use pattern that the theory has created the dependence on vehicles. The idea advanced in the narrative was not intended to be site or project specific and the statement was not made as a project goal. Given the vast amount of non-residential development occurring in the other quadrants in the intersection, perhaps the future project will develop with higher density residential within walking distance of major employment or with small convenience retail businesses, daycare centers, medical or dental offices, all of which are complimentary uses to the surrounding area.

The Traffic Impact Statement shows that this general proposal will almost double the daily total trips (from 6,393 to 12,663). Within the TIS, all the traffic from the proposal is shown going to Ellenton-Gillette. Can this roadway maintain an acceptable level of service with this amount of new development?

RESPONSE: The standard of review at the time of reviewing a FLUM amendment is whether there are any current public facility deficiencies in the area and whether

the proposed amendment will further decrease the level of service. There are no currently identified public facility deficiencies in the Plan Amendment Area.

A Traffic Impact Statement provided with a FLUM amendment has a very narrow and specific purpose. Its evaluation must include an estimate of the worst case scenario in the change in traffic generation and the applicant must utilize maximum floor area ratios for non-residential development. Historically, maximum floor area ratios have never been realized and in fact have occurred at substantially lower rates. The Public Works Department's Transportation Planning Division requires a long term analysis to the year 2040. The assumption in the TIS is also that the growth rate applied and all trip generation of the project is immediately on the road. This is why the TIS is not used for the purposes of determining compliance with level of service standards. The County, however, can use the data provided in its long term transportation planning.

Will the traffic generated from the development truly only go to Ellenton-Gillette?

RESPONSE: The property has frontage on both 29th Street East and Ellenton Gillette Road. As 29th Street East is a dead end road to the east (stopping at Interstate 75) any traffic accessing 29th Street East would then be distributed to Ellenton Gillette Road. It would have been disingenuous to prepare a Traffic Impact Statement with project distribution to 29th Street East.

How does this connect the project to the major employment center to the east (referenced on Page 3)?

RESPONSE: As the County is aware, there is no common boundary between the subject property and the referenced employment center. The properties are separated by a strip of land measuring approximately 20 feet in width. It remains to be seen whether this land becomes part of the future planned thoroughfare known as 49th Avenue East. Should the future right of way be located along the boundary of the subject parcel, any future development would likely gain access to the roadway.

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