



PLANNING & DEVELOPMENT DEPARTMENT COMMUNITY DEVELOPMENT BOARD STAFF REPORT

MEETING DATE: September 18, 2018
AGENDA ITEM: E.6
CASE: TA2018-06003
ORDINANCE NO.: 9161-18
REQUEST: To amend the Clearwater Community Development Code, to expand the allowance of self-storage warehouses as a Flexible Standard Use in the Regional Center Subdistrict of the US 19 Zoning District, where it is currently allowed only in the Corridor Subdistrict
INITIATED BY: Savelle Clearwater Countryside, LLC

BACKGROUND:

Pursuant to Community Development Code Section 4-601.B, amendments to the Code may be initiated by the City Council, the Community Development Coordinator or by any person in conjunction with an application for a development approval. Savelle Clearwater Countryside, LLC, owner of property located at 26489 US Highway 19, submitted an application for a text amendment to allow self-storage warehouses in the Regional Center Subdistrict of the US 19 Zoning District, along with the required development application. The original proposed text amendment was presented to the Community Development Board at its August 21, 2018 meeting. Prior to the Board making a recommendation, the applicants' requested a continuation to a date uncertain to allow time to make changes to the proposed amendments. The applicant submitted the revised text amendment for staff review. The remainder of this staff report has been updated to reflect the amended application.

The US 19 Zoning District allows this warehouse use but limits it to the Corridor Subdistrict. This amendment is being initiated because this property is located within a Regional Subdistrict and the owner has a pending purchase agreement with Broome Capital, a real estate investment and development company that pursues infill self-storage development opportunities. According to Broome's website, their ". . . primary takeout objective is to select sites and design high quality facilities in strong retail locations that the self-storage REITS are aggressively procuring."

Planning for US Highway 19

The City of Clearwater, with the assistance and support of Forward Pinellas and Pinellas County Economic Development has invested significant time and resources planning for the redevelopment of the US Highway 19 corridor. The goal for these efforts is to reposition the corridor to make Clearwater a more economically competitive, sustainable, and livable community. Efforts began as early as 2008, when the Clearwater Comprehensive Plan designated the areas around Countryside Mall and Clearwater Mall as activity centers through the Citywide Design Structure (Map A-14), which serves as the City's guide to development and land use decisions. Additionally, the area in between these centers and to the City limits were identified as a redevelopment corridor.

In 2011 Clearwater Greenprint recognized the opportunity to create vibrant, mixed-use, transit-supportive activity centers on US Highway 19 that link people with jobs and services and the need to incentivize such development. In that year the City also completed the Economic Development Strategic Plan which is organized around the core goals of pursuing tax base diversification, higher paying jobs, and business vitality. A priority strategy identified in the Plan is to establish an employment center overlay district to encourage higher-wage employment along US Highway 19 due to its transportation access and strategic location in region. The Plan's objective for the corridor is to facilitate development projects generating higher wage jobs for the region by permitting higher density development and transitioning out incompatible uses.

In 2012 the City Council approved the US 19 Corridor Redevelopment Plan which is a guiding document that contains strategies to leverage the corridor's unique locational advantages, capitalize on market opportunities and maximize benefits of planned transit and transportation improvements. A major component of the Plan is organizing the corridor into three different revitalization areas – regional and neighborhood centers and corridor areas - that have different objectives based on different locational characteristics. The Plan also includes general guidance on design standards to ensure projects along the corridor contribute to the creation of more compact, accessible, and attractive pedestrian- and transit-friendly destinations. Revitalization and redevelopment strategies provide more details on how to achieve this vision. During this same time, the Pinellas Planning Council, now known as Forward Pinellas, prepared a significant update to the Countywide Plan which created the framework for the City to designate US Highway 19 with activity center and multimodal corridor designations on the Countywide Map and on the City's future land use map. These amendments resulted in significant increases in development potential to ensure critical mass for transit-supportive development.

US 19 Zoning District and Design Standards

The culmination of the above planning work was the adoption of the US 19 Zoning District and Development Standards in 2017 and the rezoning of seven miles along US Highway 19. The District established three subdistricts to govern development potential, uses and parking: Regional Center, Neighborhood Center and Corridor. According to the US 19 Corridor Redevelopment Plan regional centers are appropriate for mixed-use development with an emphasis on employment-intensive and transit supportive uses. Two areas previously designated as activity centers in the Clearwater Comprehensive Plan are the two Regional Center Subdistricts - the Countryside/Westfield and Clearwater Mall areas. The Neighborhood Centers are applied to areas planned to serve as local shopping and employment destinations and are generally located between

Northeast Coachman and Sunset Point Roads, Curlew Road, and between Nursery and Belleair Roads. The remainder of US Highway 19 is designated Corridor where a wide range of employment-intensive office uses is favored over small-scale retail uses and greater flexibility is provided for site design and larger front landscaped areas required.

To facilitate the goals and objectives of the City's planning efforts, allowable uses and development potential of each Subdistrict reflect the stated objectives and design standards to ensure the uses, development pattern and desired activity is consistent with the vision. Development potential for the Subdistricts are as follows: Regional Center – 2.5 FAR; Neighborhood Center – 1.5 FAR; and Corridor – 1.5 FAR.

The US 19 Zoning District and Development Standards is a form based code, and the standards are intended to ensure that new buildings and significant renovations and additions are designed in accordance with the vision in the US 19 Corridor Redevelopment Plan. Development is regulated by subdistrict, as previously described, as well as by street frontage type. Street Frontage Types A and B identify the most pedestrian- and transit-oriented locations along major streets crossing US 19 and along US 19 frontage roads, respectively. Street Frontage Type C also identifies pedestrian- and transit-oriented locations along US 19 while introducing limited front parking areas. Street Frontage Types E and F are the least pedestrian- and transit-supportive by design and are designated on properties consistent with this approach.

PROPOSED CODE AMENDMENT:

The applicant is proposing to revise Section B-303.A, Table 2, Use and Parking to allow self-storage warehouse as a Flexible Standard Use in the Regional Center Subdistrict. Currently, this use is allowed within the US 19 Zoning District but only in the Corridor Subdistrict. Use specific standards are also proposed for those warehouses located in the Regional Center Subdistrict. Specifically, the amendment would limit the use to parcels with Street Frontage Type C that do not have any other Street Frontage Type. Additionally, 100% of the ground floor frontage and a minimum of 20% of the total ground floor area would be required to be occupied by retail, restaurant and/or office uses. These standards would also require access to the storage units from the building interior and would prohibit any outdoor storage.

The applicant is proposing significant changes in the minimum off-street parking requirements for self-storage warehouses whether located in the Corridor Subdistrict or in the Regional Center Subdistrict. The current parking requirement is one parking space for every 20 units plus two spaces for the manager's office. The proposed amendment would change that to one parking space for every 150 storage units for the warehouse use. As commercial uses would be required to occupy a portion of the ground floor frontage in the Regional Center, the applicant is proposing a standard of four parking spaces for every 1,000 square feet of retail, restaurant and office space, consistent with the current standard for such uses elsewhere in the District.

ANALYSIS:

Use Considerations

Permitted uses in the US 19 Zoning District are organized by Subdistrict. Because the Regional Center Subdistrict objectives focus on creating an environment conducive to attracting high wage employment, activity and transit, the list of uses permitted is very deliberate. Economically unproductive land uses and those that do not generate people and activity, or support transit were not included, while economically productive uses such as light assembly were added throughout the District. While it is recognized the corridor is a place to accommodate a large variety of uses, with the exception of dirty industry, not all uses are appropriate in all Subdistricts. Uses excluded from the Regional Center or Neighborhood Center Subdistricts are generally allowed in the Corridor. Examples include nursing homes, animal boarding, outdoor recreation/ entertainment, problematic uses, self-storage warehouses, social and community centers, and limited vehicle service. These uses were excluded from key locations because they typically do not generate activity or high wage employment.

According to Sparefoot.com, 9.5 percent of households in the U.S. rent a self-storage unit. Clearly this use serves a community purpose by providing residents and businesses with a place to store items due to downsizing, renovations, death, divorce, dislocation, expanding inventory, etc. When determining which uses should be allowed where in the City, traffic generation is an important factor to consider. According to The Lock-Up Self Storage, self-storage warehouses generate less traffic per square foot than almost any other use and draw only six percent of the traffic of a similarly sized retail development. This data clearly illustrates people do not frequent self-storage warehouses. Lack of activity in an urban environment creates dead zones. While lack of traffic and activity can be beneficial in certain locations, that is not the case for Regional Centers. Self-storage warehousing is not a use that will positively contribute to an activity center as it is a place for things and not people. The US 19 Zoning District makes a place for this use in the Corridor Subdistrict, which includes 473 acres in areas adjacent to and in close proximity to the Regional Center Subdistricts.

Cities in Pinellas County and across the country are dealing with the onslaught of new self-storage warehouse uses, many of which are consuming key sites in redevelopment areas that would otherwise be available for uses that generate activity and jobs. Due to the concerns with the consumption of valuable land for warehousing purposes, cities are taking a variety of approaches such as prohibiting self-storage warehouses in certain zoning districts, instituting distance requirements between self-storage uses, prohibiting warehouses within a certain distance from specific zoning districts, instituting design criteria and requiring a mix of uses, etc. The City of Clearwater has accommodated self-storage warehouses in the Commercial (C) and Industrial, Research, and Technology (IRT) zoning districts and most relevant to this request, in the Corridor Subdistrict of the US 19 Zoning District (which abuts the Regional Center Subdistricts). The use is allowed in the Downtown District provided it is accessory to another principal use. According to industry leader The Lock Up Self Storage, a FAR of 0.8 – 1.2 will accommodate most self-storage projects; the Corridor Subdistrict has a FAR of 1.5. At present there are two pending site plan applications for new self-storage warehouses in the City of Clearwater. One is in the Commercial (C) zoning district which has a FAR of 0.55 and the other is on a site zoned both Commercial (C) and Industrial, Research and Technology (IRT) with a FAR of 0.55 and 0.65

respectively. Both projects are proposed at the maximum allowable FAR and meet the required parking.

This text amendment primarily benefits self-storage warehouse developers as the 2.5 FAR afforded in the Regional Center Subdistrict will enable warehouses to be constructed on smaller properties which in turn allows the developer to purchase less land than would be required in the Corridor Subdistrict and other zoning districts.

Use Specific Standards

In an attempt to mitigate the concerns about self-storage warehouses in the Regional Center Subdistrict, the applicant is proposing some use specific standards:

- Preclude use from locating anywhere except on Street Frontage Type C
- Require 100% of ground floor frontage and a minimum of 20% of the total ground floor area to be occupied by retail, restaurant, and/or office uses not associated with the self-storage warehouse use
- Require access to all storage units from the building interior
- Prohibit outdoor storage

Precluding self-storage from Street Frontage Types A or B will prevent them from locating at key corners. Requiring some commercial space is an attempt to activate the ground floor, however, the amount of space allocated for non-warehouse use would be insignificant compared to the overall size of the building and property. For an example, the applicant's development proposal includes 800 self-storage units. The maximum total building area allowed on the site is 88,209 square feet (0.81 acres, 2.5 FAR), which will be used for this example due to discrepancies in gross floor area shown on the submitted plan. (It should be noted the proposed site plan needs to be revised to meet the requirements of the US 19 Zoning District and to reflect some changes made in the text amendment after it was submitted.) Based on the current design, the building has a width of 75 feet along the street frontage, and the proposed ground floor is 16,090 square feet. Twenty percent (20%) of the total ground floor area would require 3,218 square feet of commercial space to be incorporated into the project. This is an inconsequential amount when compared to an overall building size of almost 90,000 square feet (only 3.6% of the total project area). Furthermore, such a small amount of commercial floor area would not create a dynamic mixed-use or employment intensive project consistent with the intent of the Regional Center Subdistrict. (It should be noted that the Community Development Code defines mixed-use as "a combination of *residential* and non-residential uses on a single property", which can be either horizontally or vertically mixed [emphases added]. The proposed amendment does not require "mixed-use" consistent with this definition, but rather a mix of uses.) Additionally, the requirement is likely to produce such small commercial spaces they may not be marketable to many retailers/restaurants which typically require an average of 1200 – 3500 square feet (e.g. Metro PCS, Dunkin Donuts, Chipotle, Smoothie King, Starbucks, etc.). In this example the commercial use requirement likely would create one small rentable space.

Parking

The applicant is proposing to revise the current parking requirement for self-storage warehouses from one space per 20 units plus two for the manager's office, which is consistent with the requirement in the Commercial (C) and Industrial, Research and Technology (IRT) Districts, to one space per 150 self-storage units. Based on the applicant's proposed 800 self-storage units, six parking spaces would be required for that component of the project. The requirement for the commercial uses (20% of the total ground floor area) is proposed to be four spaces per 1,000 square feet of floor area. Based on the applicant's proposed building, an additional 12 spaces would be required for a total of 18 for the proposed project.

The minimum parking requirements were streamlined in the US 19 Zoning District with the majority of non-residential uses having the same parking requirement (4 spaces per 1,000 square feet). This decrease in required parking for many uses, compared to what is required in other Districts, facilitates the ability to change uses more easily without required parking acting as a barrier. However, this standard also recognizes the characteristics of the corridor as more auto-oriented than Downtown Clearwater, one of the City's other major activity centers. Parking is still a necessary component of new development projects in the corridor, but the District's Development Standards mitigate its impact on walkability through restricting the placement of parking.

Economic Development Strategic Plan Considerations

Another important factor considered when determining the allowable uses in the Regional Center Subdistrict was how that use contributes to the local economy. Self-storage warehouses were excluded due to the lack of positive economic impact associated with this use. Self-storage generates very few direct and in-direct jobs (typically 3-4) and provides low wages. According to data from Indeed.com average self-storage hourly pay ranges from approximately \$9.19 per hour for an Associate to \$13.38 per hour for a Store Manager. (According to Indeed.com this information was based on 188 data points collected directly from employees, users and past and present job advertisements on Indeed over the past 36 months.) Assuming Associates and Store Managers are full-time employees, those average wages fall below 80% of the area median income.

In sum self-storage warehouse facilities account for low – average wages and are extremely limited employment generation at best which does not meet the objectives of the Regional Center Subdistrict. Allowing this use in the Regional Center Subdistrict will remove what would be an opportunity for productive land in terms of job creation and income. If warehousing is allowed in the Regional Center Subdistrict, there will be a reduction in the land area available to accommodate the number and types of jobs the City is targeting for the Regional Centers.

CRITERIA FOR TEXT AMENDMENTS:

CDC Section 4-601 sets forth the procedures and criteria for reviewing text amendments. A determination should be made whether the proposed amendment is consistent with and furthers the goals, policies and objectives of the Comprehensive Plan, and furthers the purposes of the development code and other city ordinances and actions designed to implement plan.

The proposed amendment is inconsistent with and does not further the goals, policies and objectives of the Comprehensive Plan.

A review of the Clearwater Comprehensive Plan identified the following Goals, Objectives and Policies which will be not be furthered by the proposed text amendment to the Community Development Code:

- Goal A.5 The City of Clearwater shall identify and utilize a Citywide design structure comprised of a hierarchy of places and linkages. The Citywide design structure will serve as a guide to development and land use decisions while protecting those elements that make the City uniquely Clearwater.
- Policy A.5.1.1 Identify Activity Centers: high intensity, high-density multi-use areas designated as appropriate for intensive growth and an integrated pattern of development that routinely provide service to a significant number of citizens of more than one county or that serve multiple residential communities by providing a mix of neighborhood-serving shopping centers as well as a mix of employment and residential opportunities. Activity centers are composed of multiple destination points, landmarks and character features, and are proximate and accessible to interstate or major arterial roadways or to minor arterial roadways, collector or local major streets, if the activity center is neighborhood serving. Activity Centers are served by enhanced transit commensurate with the type, scale and intensity of use.
- Policy A.5.4.5 U.S. Highway 19 North from Curlew Road to Belleair Road, including cross streets and Gulf-to-Bay Boulevard east of U.S. Highway 19 North. Amendments to the Future Land Use Map and Zoning Atlas should promote redevelopment and land assembly. Redevelopment should prioritize pedestrian- and transit-supportive street frontages and establish mixed-use destinations at major cross streets that provide safe, attractive and accessible settings in order to create a safe and attractive environment and an economically competitive community. Annexations and the installation of appropriate streetscape improvements should be encouraged.
- Policy A.5.5.6 Implement design standards for US Highway 19, which has transitioned from a roadway providing land access to a controlled access highway with ramps that are located less than two miles apart. Such standards should allow for higher intensities and a mix of land uses to allow for greater employment opportunities along the corridor, while improving accessibility and safety for cars, people and bicycles.
- Policy A.6.1.6 Land use decisions in Clearwater shall support the expansion of economic opportunity, the creation of jobs and training opportunities as well as the maintenance of existing industries through establishment of enterprise zones, activity centers and redevelopment areas and by coordination with

the Chamber of Commerce, Tourist Development Council and other economic development organizations and agencies.

Policy A.6.1.11 US Highway 19 is recognized on the Countywide Plan Map as a Multimodal Corridor (MMC), with major intersections designated as Activity Center (AC). The applicable Multimodal Corridor and Activity Center subcategories are shown on the Transit-Oriented Land Use Vision Map within the Countywide Plan Strategies.

Policy A.6.1.12 Redevelopment of US Highway 19 shall be encouraged through the establishment of development standards which implement the Planning and Urban Design Principles within the Countywide Plan Strategies by allowing for more intense development while also promoting more employment-intensive, transit- and pedestrian-supportive development, establishing mixed-use destinations and providing safe and attractive settings for working, living and shopping. These standards should:

- a. Concentrate office and other employment-intensive uses in places with easy access to US 19;
- b. Provide for retail, entertainment and other uses that serve the needs of surrounding neighborhoods;
- c. Promote high-intensity uses in close proximity to potential or planned transit routes;
- d. Lessen demands on local and regional street network by maximizing opportunities for the localization of work, shopping and leisure trips;
- e. Support shared parking and “park once” trips;
- f. Promote active lifestyles by encouraging walking and biking as convenient alternatives to automobile travel; and
- g. Contribute to street-level pedestrian activity and the informal surveillance of public spaces.

Policy A.6.8.2 Encourage mixed-use development that includes a combination of compatible land uses having functional interrelationships and aesthetic features. Commercial and mixed-use buildings shall be sited to maximize pedestrian connections from the building to adjacent streets. Buildings should be sited and parking arranged to minimize the off-site impacts to residential areas.

Because the City recognizes a community need for self-storage, the US 19 District has provided a place for it in the Corridor Subdistrict. A total of 473 acres are available to accommodate that use, which is almost the size of the area governed by Clearwater Downtown Redevelopment Plan. The Corridor, which is outside of the designated activity center, has more flexibility in terms of permitted uses, site and parking lot design and overall form of development due to its location and function. Direct access to a US 19 interchange is less critical to the success for uses like self-storage warehouses with lower volumes of customer traffic, so location within the Corridor Subdistrict is appropriate. Establishing self-storage warehouses in the Regional Center Subdistrict introduces a use which does not support the goals of the activity centers on US Highway 19 as designated on the Citywide Design Structure and does not prioritize or support an employment

producing or transit supportive land use in the Regional Center. The Regional Center Subdistrict is an inappropriate place for self-storage warehouses in the US 19 Zoning District. The Corridor Subdistrict is the appropriate place for this use as due to their locational characteristic and the fact the planned level of pedestrian activity and compact development is significantly less than in the Regional Centers.

The proposed amendment does not further the purposes of the Community Development Code and other City ordinances and actions designed to implement the Plan.

The proposed text amendment does not further the purposes of the CDC in that it will be inconsistent with the intent and purpose of the US 19 Zoning District and Design Standards as set forth in in CDC Section B-101:

The intent and purpose of the US 19 District & Development Standards (“Development Standards”) is to guide the development and redevelopment of sites along US 19 consistent with strategies defined in the US 19 Corridor Redevelopment Plan. The standards are designed to accomplish the following.

- Promote employment-intensive and transit supportive forms, patterns and intensities of development;
- Encourage the development of mixed use destinations at major cross streets;
- Provide for the design of safe, attractive, and accessible settings for working, living and shopping.

The proposed text amendment allows a warehouse use in the Regional Center Subdistrict which is the most intensive designated activity center outside of Downtown Clearwater. The Regional Center Subdistrict has a significant FAR allowance to incentivize dynamic high wage employment and commercial activity. Consistent with the Countywide Plan these activity centers are intended to maximize the concentration of jobs and populations along transit routes. Self storage warehouses are antithetical to these goals as they do not attract people and result in dead space in an area where vibrancy and vitality are measures of success. Self-storage is not compatible with the intent and purpose of the Regional Center Subdistrict of the US 19 District or US19 Corridor Redevelopment Plan, regardless of the applicants’ intent to limit it to Street Frontage Type C and to require a limited amount of commercial use in addition to the self-storage warehouse use.

The proposed text amendment does not further the following general purposes of the Community Development Code:

Sec. 1-103.A. It is the purpose of this Development Code to implement the Comprehensive Plan of the city; to promote the health, safety, general welfare and quality of life in the city; to guide the orderly growth and development of the city; to establish rules of procedure for land development approvals; to enhance the character of the city and the preservation of neighborhoods; and to enhance the quality of life of all residents and property owners of the city.

- Sec. 1-103.B. It is the purpose of this Community Development Code to create value for the citizens of the City of Clearwater by:
- Allowing property owners to enhance the value of their property through innovative and creative redevelopment;
 - Ensuring that development and redevelopment will not have a negative impact on the value of surrounding properties and wherever practicable promoting development and redevelopment which will enhance the value of surrounding properties; and
 - Strengthening the city's economy and increasing its tax base as a whole.
- Sec. 1-103.E.2. Protect the character and the social and economic stability of all parts of the city through the establishment of reasonable standards which encourage the orderly and beneficial development of land within the city.
- Sec. 1-103.E.9. Establish permitted uses corresponding with the purpose and character of the respective zoning districts and limit uses within each district to those uses specifically authorized.

As outlined above, the proposed text amendment does not further the goals, objectives and policies of numerous city plans related to the redevelopment of US Highway 19. The proposed addition of self-storage warehouses in the Regional Center Subdistrict does not promote the economic stability of the subdistrict, will not strengthen the economy, and does not establish a use consistent with the purpose and character of the Regional Center.

SUMMARY AND RECOMMENDATION:

The proposed amendment to the Community Development Code is inconsistent with and in direct conflict with the goals and objectives of Clearwater Greenprint, Clearwater Economic Development Strategic Plan, US 19 Corridor Redevelopment Plan and the Clearwater Comprehensive Plan and is inconsistent with purposes of the Community Development Code. Furthermore, it is unnecessary to accommodate the proposed activity. Based upon the above, the Planning and Development Department recommends **DENIAL** of Ordinance No. 9161-18 that amends the Community Development Code.

Prepared by Planning and Development Department Staff: _____

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Revised by Planning and Development Department Staff: _____

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ATTACHMENTS: Ordinance No. 9161-18 (Revised 8/24/18)
Resume