

July 13, 2021

Renea Vincent, Planning Director
City of Tarpon Springs
324 E. Pine Street
Tarpon Springs, FL 34689

RE: June 21, 2021 Requested Hays Rd Review

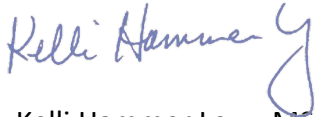
1. Alternative 2 was stated as the selected alternative, but Alternative 1 is shown in the Preliminary Development plan submitted.
2. The report identifies several waivers/variances that will be required with their recommended alternative, including right-of-way width, lane width, and sidewalk requirements. Waiver for the right-of-way width has typically been limited to long rectangular parcels with development limited to one side of the road.
3. Section 2.4 - The report recognizes that the elevation difference between the proposed road and the existing property's driveways may make it difficult to provide access but doesn't propose a solution. The elevation difference may also require additional protection.
4. Section 2.10 – the report recognizes a detailed traffic study would be required to evaluate the impacts to the adjacent roadway network. That study will be required in order to determine if a connection in this area is feasible or should be considered.
5. Figure 10 – the title is for Alternative 4, but the figure is Alternative 2.
6. Section 3.4 – it appears the No Build option was eliminated from consideration because it “did not meet the project purpose and need.” However, Ordinance 2020-32 # 22 states there is an alternative connection to US19.
7. Is there a drawing/sketch showing what the emergency access to SR19 would look like?
8. How would the nature trail be tied into the road for access?
9. The roadway will need to meet the requirements found in the Pinellas County Stormwater Manual (PCSM) as described in Chapters 3, 4, 5, and 6. These requirements relate to the maximum allowable discharge rates, required stormwater quality treatment, and general stormwater design. (http://www.pinellascounty.org/plan/stormwater_manual.htm).

10. Proposed roadway it will increase elevations and will may cause floodplain impacts to unincorporated County residents. "The proposed horizontal and vertical alignments will result in a significant elevation increase from the existing ground to the proposed roadway." Offsite impacts would need to be evaluated as well as the connecting roadway.
11. Alternative 2 proposes using exfiltration trench to meet PCSM. Exfiltration trench is generally not recommended for this application and would not likely be able to meet requirements due to the site conditions.
12. Treatment swales may be permitted in the Right of way for water quality requirements.
13. All proposed utilities that will serve the site through the Hays Road ROW must be shown on the plans.
14. Section 163.3177(6)6., Florida Statutes, requires that local governments limit public expenditures that subsidize development in Coastal High Hazard Areas. Per the Pinellas County Comprehensive Plan (see excerpt), Coastal Element, the County may not fund infrastructure for new or redevelopment in the Coastal Storm Area, which is what this proposed road would require.
15. From the proposed road at the property line to access to US 19, via the three main routes, at least two miles of roadway through residential unincorporated area would need O&M and potential improvements to accommodate the additional use from the residents and workers serving the 404 unit complex. If Hays Rd were extended, travelers would have to travel in between two residential homes onto low lying residential roadway through residential neighborhoods for a minimum of a mile depending on route to reach US 19. Additionally, the connection to the significantly higher elevation would likely have additional adverse flooding impacts to the existing neighborhood to the east of the proposed development.
16. The proposed project area and proposed road are currently highly vulnerable to flooding and storm surge. Sea level rise projections also indicate significant impact from blue sky flooding and increased storm surge in this area. The proposed project site and road are also entirely located within the current conditions 25-year coastal floodplain and portions of the proposed site will be inundated with a king tide in 2040 when accounting for an intermediate sea level rise trend (Pinellas County Vulnerability Assessment, 2020). Flooding impacts from these vulnerabilities may include reductions in Level of Service (LOS), such as inundated roadways during small flood events; damaged property, such as vehicles, or infrastructure, such as sanitary sewer lift stations, from moderate or large flood events; and long term loss of use, such as displaced residents while property and infrastructure is repaired or replaced.
17. Avoidance of flood losses (Loss of use, property damage (e.g. buildings, vehicle, other property located below flood elevation), infrastructure level of service (e.g. roads, sidewalks, stormwater, sanitary system), and infrastructure damage) and its negative impact on people is the first line of defense and floodplain management best practice. Per Florida Statutes, 163.3178, "it is the intent of the Legislature that local government comprehensive plans restrict development activities

where such activities would damage or destroy coastal resources, and that such plans protect human life and limit public expenditures in areas that are subject to destruction by natural disaster.” Even if built to a higher standard, this proposed development does the opposite by placing more people in a highly vulnerable area, which does not protect them nor limit public expenditures. Additionally, federal regulations for floodplain management require that any community participating in the National Flood Insurance Program “must take into account flood, mudslide (i.e. mudflow) and flood-related erosion hazards, to the extent that they are known, in all official actions relating to land management and use” (44 Code of Federal Regulations § 60.1, Purpose of subpart, Section (c)). Further, 44 CFR § 60.22(c), among other things, requires communities consider human safety, diversion of development to areas safe from flooding, adverse effects of floodplain development on existing development, and coordination of plans with neighboring communities.

This is a preliminary courtesy review utilizing the information provided. Based on the identified impacts and the recommended option’s inability to meet most of our design criteria, the No Build alternative should be given more consideration.

Sincerely,

A handwritten signature in blue ink that reads "Kelli Hammer Levy". The signature is written in a cursive style with a large, stylized "y" at the end.

Kelli Hammer Levy, MS, MPA, CPM, ENVSP
Director, Pinellas County Public Works

Cc. Jill Silverboard, Deputy County Administrator/Chief of Staff