



**Report Concerning Proposed Amendments to Hillsborough County's
Comprehensive Land Use Plan – CPA 10-14 and CPA 10-15
aka “Green Technology Corridor” Plan Amendments
May 3, 2010**

Summary of Findings

A review of the Planning Commission staff reports that accompany CPA 10-14 and CPA 10-15 reveals that **the proposed amendments do not meet the requirements of Administrative Rule 9J5, contain unsubstantiated data and analysis, represent unsound economic development policy and are not consistent with the Hillsborough County Comprehensive Plan.**

The Green Technology Corridor plan amendments are largely an admitted attempt to simply rebrand the I-4 Corridor...apparently for public relations purposes. “Green industries” are not defined as a part of the amendments, and there are no intrinsic advantages identified along I-4 that would make it a desirable location for green industries as they are normally defined. **This rebranding and public relations exercise is proposed at the expense of underlying principles of the County’s comprehensive plan which encourage compact growth and threaten the rural lifestyle of thousands of Hillsborough County residents who currently live within the affected area.** It is suggested that the incentives identified in the amendments be applied to the extremely large amount of vacant property with entitlements and existing vacant structures within the Urban Service Area in order to encourage development and redevelopment where the Plan directs it to occur.

The following are highlights of the findings that are presented in greater detail below.

The proposed amendments...

- Do not include data and analysis to justify need and do not meet the Needs Analysis requirements of the DCA

Within active Developments of Regional Impact (DRI) in Hillsborough County, there are over 36,000,000 square feet of approvals remaining for Light Industrial/R&D development on vacant land and 27,000,000 square feet of approvals remaining for Office development on vacant land. This is sufficient space to house approximately 157,500 employees in new structures built on vacant land with existing entitlements (assumption of one employee per 400 square feet of space).

- Do not meet the Urban Sprawl Criteria established by the DCA and are the embodiment of urban sprawl as it is commonly conceived



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- Are in effect expansions of the Urban Service Boundary (USA) under the guise of an overlay without meeting the requirements for expanding the USA
- Are inconsistent with numerous Objectives and Policies in the Future Land Use Element relating to preservation of agricultural land, the creation of economic development areas and other issues noted below
- Do not support Objectives and Policies within the adopted Future Land Use element which directs the BOCC to encourage development of the I-75 Corridor.

Introduction

The following report was prepared as a public service to the residents and property owners of Hillsborough County. The report was prepared by the Managing Director of the South Hillsborough County Economic Development (SHED) Council (Jim Hosler). The Managing Director of the SHED Council has nearly 30 years of land planning and economic development experience in Florida and is the owner of Demographic Decision Dynamics, LLC – a Tampa-based demographic and land use consulting company.

The proposed plan amendments address a laudable goal of improving the Hillsborough County economy. **The laudable goal; however, cannot be addressed by simply providing more vacant land for unidentified businesses that may one day expand to Hillsborough County.** If there were unmet demand for vacant industrial or office-related land, then the entitlements at existing Developments of Regional Impact (DRI's...discussed below) would have been consumed. Instead, vacancy rates for Office space are approaching 20% in 2010Q1 compared to 14% in 2008Q1 (Grubb and Ellis). Within the Industrial sector, vacancy rates are over 11% for the Tampa Bay area compared to 5% two years previously (Grubb and Ellis).

Hillsborough County's long and short term economic challenges are not related to a shortage of raw land or space for new companies. Our challenges are much more complex and should be addressed with a comprehensive strategy. Our challenges will not be met with these ill-conceived plan amendments that treat economic development as if it were a rebranding exercise. There are accepted definitions of Green Industries which are not addressed or encouraged by these plan amendments in the proposed locations. If found to be consistent with the comprehensive plan, the plan amendments would set a dangerous precedent that would allow the BOCC to ignore the guiding principles of the comprehensive plan and economic development in the pursuit of public relations as opposed to sound policy.

We should not use the recession as a reason to ignore good planning and economic principles and open up more land outside of the USA for development. It is suggested that the BOCC consider using the incentives noted in Objective 51 of CPA 10-14 to help develop all existing entitlements on vacant land within the USA and redevelop empty structures. As the applicant, the



BOCC is attempting to hold itself to a much lower standard than it would a private sector applicant.

The Proposed Plan Amendments Do Not Justify the Need for Additional Industrial/Office Vacant Land or Existing Structures

The proposed plan amendments begin with the simple undocumented assertion that there is the need for more industrial/office vacant land in order to address Hillsborough County's need for employment opportunities. The plan amendments make reference to "data made available" that demonstrates the need for more employment opportunities; however, this data is not presented as a part of the amendment request. More importantly, there is no data and analysis presented that links a hypothesized shortage of land to our employment shortages.

Hillsborough County and its three cities have sufficient vacant land within urban areas to address decades-worth of employment growth – much more than is noted "as needed" in the limited data and analysis contained in the plan amendments. Our employment challenges do not relate to a shortage of vacant land, rather they are the result of national economic problems and the County's lack of a coherent economic development strategy that looks beyond simply opening up more vacant land outside the USA.

According to the March 31, 2010 *Development of Regional Impact Information Matrix* released by the Tampa Bay Regional Planning Council, Hillsborough County has raw land with entitlements that can support tens-of-millions of square feet of industrial and office employment. Much of this land is located along the I-75 Corridor, which is identified in the comprehensive plan as the preferred location for new employment opportunities.

Active DRI's with Entitlements for Light Industrial/R&D

Florida Corporate Center
Big Basin Corporate Park
Tampa Telecom
Tampa Technology Park West
Oak Creek
Eastshore Commercial Park
University Center Research and Development Park
Walden Woods Industrial Park
Gregg Business Center
The Crescent
SouthShore Corporate Park

Total Square Footage of Industrial/R&D Entitlements Remaining: Approximately 36,000,000 square feet – space sufficient for 90,000 employees which is 2.5 times the Industrial employment in Hillsborough County in 2008. In addition, Grubb and Ellis estimates that in 2009Q4 there are 11,588,764 square feet of vacant light industrial space in



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Hillsborough County which is sufficient to house roughly 28,970 employees – in 2008, Hillsborough County has a total of 28,651 Industrial employees according to the Florida Department of Labor and Employment Security.

Active DRI's with Entitlements for Office

Apollo Beach
Summerfield Crossing
Tampa Downtown
Westchase
Florida Corporate Center
Sabal
International Plaza
Hidden River
Tampa Telecom
Tampa Cruise Ship Terminal
Tampa Technology Park West
Tampa Triangle
Oak Creek
Pavilion
Crosstown Center
Eastshore
North Palms Village
Walden Woods
Gregg Business Center
The Crescent
SouthShore Corporate
Independence Park
Wolf Creek Branch

Total Square Footage of Office Entitlements Remaining: Approximately 27,300,000 square feet or sufficient space to house at least 68,250 employees. In addition, Grubb and Ellis estimates that there are 7,805,232 square feet of vacant space within existing office buildings in 2009Q4.

There is clearly no need for either raw land or existing building space to meet the demands of new industry that can be justified with data and analysis. This fact by itself should be sufficient to find the proposed amendments inconsistent with the comprehensive plan.

The Proposed Plan Amendments Are Urban Sprawl

“Urban sprawl” is defined in the County’s Future Land Use Element as...

“Uncontrolled and untimely expansion and spreading out of an urban community into the outlying non-urban areas exemplified by scattered, unplanned, low density development



without provisions for facilities and services at levels adopted in the comprehensive plan in locations not consistent with the overall concepts of the plan.”

There are at least three portions of the definition that are not met by CPA 10-14 and 10-15 relate to...

- “untimely expansion”
- “without provision of facilities and services”, and
- “in locations not consistent with the overall concepts of the plan”.

The amendments are an “untimely expansion” in that there is no documented need for the expansion, and, if successful, could lead to the reduction in property values within the USA. The adopted comprehensive plan envisions expansions into the rural service area such as these that are proposed only when there is a critical shortage of developable land documented within urban areas. Also, the amendments do not provide sufficient discussion or justification concerning how water and wastewater services will be provided along the entire length of the I-4 corridor. **I-4 is currently a failing transportation facility, and there is no discussion or justification concerning how it will be improved to meet the projected increase in service demand.** Finally, the Future Land Use element clearly envisions the rural service area as a location for agricultural and rural residential uses. The proposed amendments would jeopardize high value agricultural land and unnecessarily diminish rural lifestyle options.

The amendments also fail several of the “Urban Sprawl Indicators” used by the DCA to evaluate plan amendments.

9J-5.006 (5) (g)

2) The proposed amendments designate significant amounts of land (1,000 acres) for development in rural areas while leaping over development approvals that are in place on vacant land within the USA.

5) The proposed amendments will directly destroy or place increased pressure upon active agricultural lands as well as passive or dormant agricultural lands.

9) The proposed amendments do not provide sufficient discussion or justification concerning how there will be a clear separation between rural and urban uses.

10) **Perhaps most importantly, the proposed amendments will discourage or inhibit infill development and redevelopment by providing incentives for intense development patterns in the rural area that are not available in the urban area.**

The Result of the Proposed Plan Amendments is an Expansion of the USA

The proposed amendments are in effect a staged expansion of the USA in the guise of an overlay. The net result is the same as if the applicant (the County)



had proposed to move the USA boundary to the boundary of the overlay. Consequently, the amendments should be required to meet the criteria specified by the Future Land Use element in Policy 2.2. The amendments cannot meet these criteria in that they do not justify the need for new raw land for economic development purposes. A policy desire to place added emphasis on the I-4 corridor runs counter to the intent of the comprehensive plan to focus growth within the USA.

If a private applicant had approached the BOCC with amendments such as these, the applicant would have been required to meet the criteria specified in Future Land Use Policy 2.2. The BOCC, as the applicant, should hold itself to at least the same level of review as it does private applicants.

The Proposed Plan Amendments Are Inconsistent with Numerous Objectives and Policies in the Adopted Comprehensive Plan

A cursory review of the adopted Hillsborough Comprehensive Plan reveals a large number of Objectives and Policies that are not supported by the proposed amendments. It is not clear why these items were not included in the Staff Reports from the Planning Commission. There may be other Objectives and Policies in the adopted Plan in elements in addition to the Future Land Use Element that are inconsistent with the adopted comprehensive plan. This report only examines Objectives and Policies in the Future Land Use Element.

As a general comment, the proposed levels of intensity at 2.5 FAR (Floor Area Ratio) are in excess of any levels that are currently allowed within the USA. The suggested FAR would allow for intensities that are not compatible with the surrounding rural areas and are on par with those observed in the Westshore Business District. There are no data and analysis offered in justification of these extremely intense allowances.

For the sake of space and brevity, the Objectives and Policies that are inconsistent with the plan amendments are only listed by number and short-title. The full text accompanying each Objective and Policy can be found in the Future Land Use Element.

Objectives and Policies in the Future Land Use Element That Are Inconsistent with the Amendments

- Urban Service Area guidance contained in Policies 1.7, 2.2, 3.1 and 3.2
- Rural Service Area guidance contained in all of Objective 4, in particular Policy 4.7 relating to the extension of water and wastewater services to the rural service area
- Economic Development Area guidance contained in Policy 26.2 which states that all Economic Development Areas are to be located within the Urban Service Area
- Agricultural-related guidance contained in the majority of Objectives 29, 30 and 31 – in particular Policy 29.7 that discourages the conversion of agricultural land, Policy 30.6 that states that the agriculture and support uses are the preferred uses in the rural



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service area, and Policy 31.5 that limits activities (such as large building footprints and parking lots) which have the potential to contaminate water, soil and crops.

The Proposed Plan Amendments Are Inconsistent With and Do Not Support Objectives in the Comprehensive Plan Which Designate the I-75 Corridor as a Major Employment Center

When the comprehensive plan was first adopted and after numerous revisions, the policy guidance has remained that the BOCC is to actively promote and encourage the use of the I-75 Corridor as the primary employment area in Hillsborough County. For reasons that are not addressed at all in the Staff Reports accompanying CPA 10-14 and CPA 10-15, the incredible potential that is already present in the I-75 Corridor has been ignored. **Given the large amount of entitlements that are present along the I-75 Corridor, it is bad planning, bad economic development policy and unfair to existing property owners along I-75 who have paid for their entitlements to direct incentives to undeveloped areas along I-4.**

The I-4 Corridor in Hillsborough County is simply not suitable for development as a major employment area. Given the parcelization of the land surrounding I-4 into small plots and the presence of high-value agricultural land, there is no reason to believe that the I-4 Corridor will attract new businesses or that it is in the interest of area residents to pursue an aggressive development strategy in the hinterland. By proposing aggressive economic incentives from the rural service area in CPA 10-14 and CPA 10-15, the BOCC is encouraging urban sprawl and abandoning its pledge to develop the I-75 Corridor. The I-75 Corridor has more than sufficient approved raw land with entitlements and existing vacant structures to house all of the employment that is projected in the Staff Reports for the proposed amendments.

Specifically, Objectives 34, 35, 36, 37 and 38 in the adopted Future Land Use Element lay out a wide range of actions that the BOCC is required to take within the I-75 Corridor to encourage the development of high-wage employment centers. The proposed amendments are inconsistent with these Objectives in that they would potentially give an economic advantage to raw land in the I-4 Corridor which is far removed from urban areas.

Respectfully submitted as public input for the May 6, 2010 BOCC Public Hearing on CPA 10-14 and CPA 10-15 by:

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