



## **City of Largo**

### **Clearwater-Largo Road Community Redevelopment District**

#### **Finding of Necessity**

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**Date: 11/19/20**



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# Clearwater-Largo Road Community Redevelopment District: Finding of Necessity - 2020

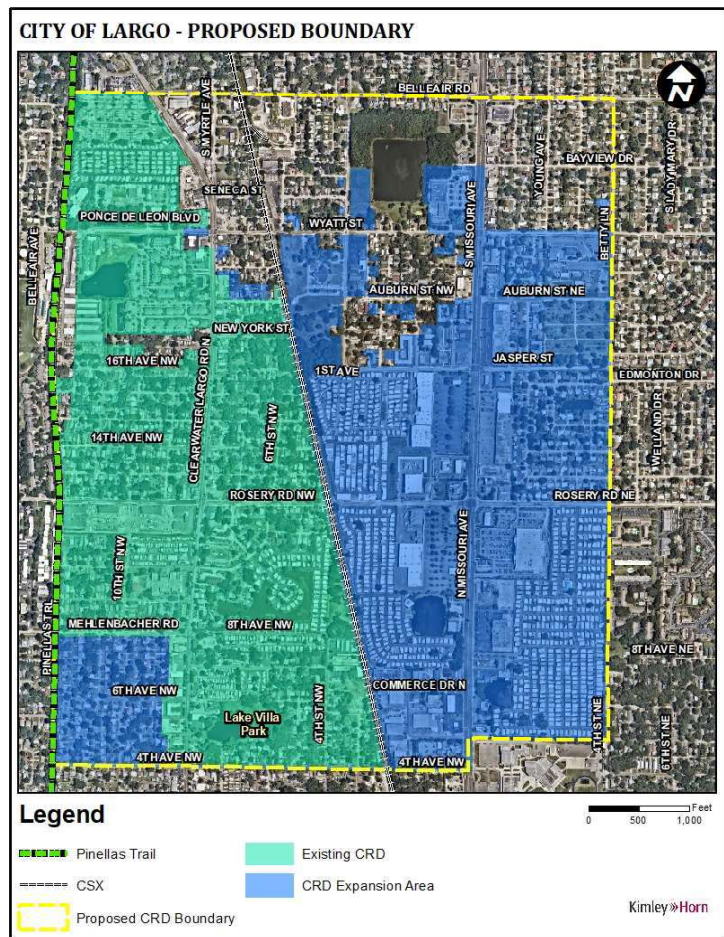
## EXECUTIVE SUMMARY

The City of Largo City Commission has requested an update to the 2015 Finding of Necessity (FON) as a basis for expanding the existing Community Redevelopment District (CRD) within the area generally referred to as the Clearwater-Largo Road CRD (CLR-CRD). This CRD was approved by the Pinellas County Board of County Commissioners (BOCC) in 1996 and has been previously expanded in 2002 and 2007. The purpose of this FON is to analyze the recommended expansion of the current CRD boundaries (as identified and established in 2015). This FON and recommended expansion has been prepared in accordance with Chapter 163, Part III, Florida Statutes (F.S.) and the Pinellas County Board of County Commissioners 2016 Community Redevelopment Area Policy Program and Implementation Guidelines, as amended.

As part of this update, the City is requesting a delegation of redevelopment authority from the Pinellas County BOCC including an expansion to the existing CLR-CRD boundaries as previously identified. In addition, the City will request the corresponding Tax Increment Finance (TIF) revenues establishing the redevelopment trust fund as part of the current process. If delegation is approved, a new (amended) redevelopment master plan (Plan) will be prepared for the entire expanded CRD.

Figure 1 identifies the boundaries of the existing CRD and the proposed expansion areas. The study area (identified in blue) is bordered by Belleair Road to the north, 4th Avenue NW to the south, Pinellas Trail to the west, and Betty Lane to the east. For this analysis, only the properties within the City of Largo limits are included. The study area consisting of the existing CRD and the proposed CRD expansion area totals 844 acres with approximately 672 acres within the City of Largo, the remaining lands are possible future expansion/annexation areas.

Figure 1: CLR-CRD Proposed Expansion Boundary



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## PROJECT OVERVIEW

The purpose of developing a CRD is to encourage targeted redevelopment of identified areas, as well as to reduce the burden placed on the community through revenue losses due to extra services required for police, fire, accident, hospitalization, and other forms of public protection, public services, infrastructure and facilities to the area. Benefits of a CRD are not limited to just those properties within the Community Redevelopment District but also provide secondary or “trickle-down” benefits and positive impacts to adjacent properties including those not within the City. The FON identifies properties which may qualify for redevelopment in accordance with the Florida Statutes (F.S) Chapter 163, Part III and *Pinellas County Community Redevelopment Area Policy Program and Implementation Guidelines*.

In October 2016 the Pinellas County Board of County Commission decided to develop a Community Redevelopment Area (CRA) Policy to evaluate and score CRAs to determine the level of funding participation and use of County Tax Increment Financing (TIF) funds. The policy enables Pinellas County to determine how to fund and prioritize areas of economic and social distress. The updates presented to the Board of County Commissioners in March 2020 identified **nine qualifying conditions** used to qualify an area for a CRD designation and County TIF funding.

These qualifying conditions are:

- 1 **Economic Potential**
- 2 **Community Development Block Groups (within eligible Census Tracts)**
- 3 **Coastal High Hazard Area**
- 4 **Median Average Age of Housing Stock**
- 5 **Demonstrated Blight Factors (Consistent with Florida Statute 163.340(8))**
- 6 **Unemployment**
- 7 **Households Below Poverty Level**
- 8 **Median Per Capita Income**
- 9 **Median Residential Values**

Subsequent to approval of the FON, the City must obtain from Pinellas County a formal delegation of authority to create the Community Redevelopment Agency or in this case, to expand the existing CRD. Over the next few pages, the FON includes the sections listed below to provide a profile of the proposed CRD as well as background on the qualifying conditions.

- Description on the Methodology Applied to Identify the Qualifying Conditions;
- Proposed Community Redevelopment District Profile;
- Additional Information on the Expansion Area Qualifying Conditions;
- Conclusion

## STATUTORY BACKGROUND & REQUIREMENTS

Per Florida Statute Chapter 163 Part III Community Development, blighted areas are a risk to the health, safety and welfare of residents and contribute to numerous negative effects such as tax base decreases, increases in crime, traffic hazards and other social and economic burdens. Per Section 163.340(8), a blighted area contains a “substantial number of deteriorated structures” based on government statistics or studies leading to overall economic distress within an area. The definition lists 15 conditions that are able to be reviewed to prove an area is blighted. These 15 conditions include the following:

- a) **Predominance of defective or inadequate street layout, parking facilities, roadways, bridges, or public transportation facilities.**
- b) **Aggregate assessed values of real property in the area for ad valorem tax purposes have failed to show any appreciable increase over the 5 years prior to the finding of such conditions.**
- c) Faulty lot layout in relation to size, adequacy, accessibility, or usefulness.
- d) **Unsanitary or unsafe conditions.**
- e) Deterioration of site or other improvements.
- f) Inadequate and outdated building density patterns.
- g) Falling lease rates per square foot of office, commercial, or industrial space compared to the remainder of the county or municipality.
- h) Tax or special assessment delinquency exceeding the fair value of the land.
- i) Residential and commercial vacancy rates higher in the area than in the remainder of the county or municipality.
- j) **Incidence of crime in the area higher than in the remainder of the county or municipality.**
- k) **Fire and emergency medical service calls to the area proportionately higher than in the remainder of the county or municipality.**
- l) A greater number of violations of the Florida Building Code in the area than the number of violations recorded in the remainder of the county or municipality.
- m) Diversity of ownership or defective or unusual conditions of title which prevent the free alienability of land within the deteriorated or hazardous area.  
To have an effective redevelopment; need effective aggregation.
- n) Governmentally owned property with adverse environmental conditions caused by a public or private entity.
- o) A substantial number or percentage of properties damaged by sinkhole activity which have not been adequately repaired or stabilized.

The proposed CRD boundary has met **five** of the adopted blight conditions directly: defective or inadequate street layout and transportation facilities, increase in aggregate assessed values of property in the past 5 years, unsanitary or unsafe conditions, higher incidence of crime and fire and emergency medical service calls compared to the city as a whole (conditions a, b, d, j, and k). The proposed CRD boundary also meets additional blight conditions to a lesser degree (conditions c, e, and m underlined above). These additional conditions are evident throughout this report and the sub district analysis for ownership, housing stock, street layout, connectivity issues, code violations, and sub district observations on deteriorating infrastructure, businesses and neighborhoods.



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Local governments must establish that a given area meets the statutory definitions, and that the revitalization and redevelopment of that area is in the interests of the community. Using available data, the Finding of Necessity Report (the next phase of this assessment) establishes the existence of certain conditions; identifies the specific problems that may be addressed through adoption of a Redevelopment Plan; and importantly, creates the findings necessary to designate the area as blighted and delegating authority for creation of the CRD. Since Pinellas County is a charter county under Florida Statutes, the City of Largo must receive delegation from Pinellas County to exercise the authorities granted by Chapter 163, Part III, Florida Statutes.

The updated FON aims to score the proposed CRD boundary within the urban revitalization category. No less than eight conditions based on the *Pinellas County Community Redevelopment Area Policy Program and Implementation Guidelines* were present within the study area as a whole. Per the *Pinellas County Community Redevelopment Area Policy Program and Implementation Guidelines*, six of the fifteen conditions are required

to obtain full points. These qualifying conditions identify a negative environment for the residences and businesses; a trend that could be improved upon through the designation and implementation of an expanded CRD. The next several pages will explore these conditions further.

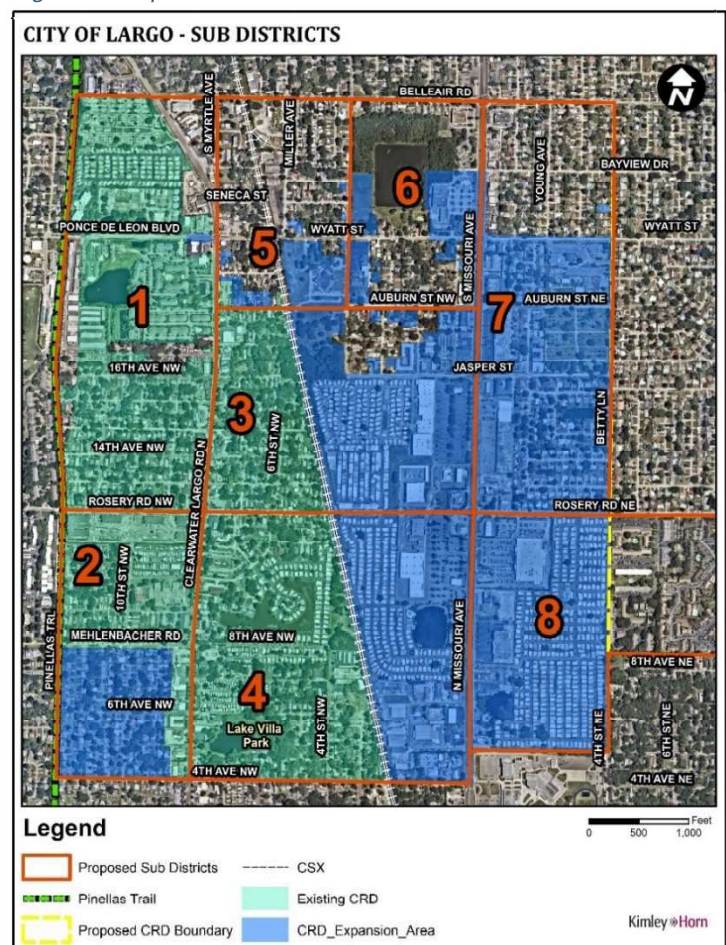
### FINDING OF NECESSITY METHODOLOGY

The existing Clearwater-Largo Road CRD has a current sunset year of 2030. The 2020 FON update focused on identifying items which contribute to deteriorating conditions within the community, based on the qualifying conditions in the Chapter 163, Part III and the *Pinellas County Community Redevelopment Area Policy Program and Implementation Guidelines*.

This analysis evaluated the conditions of properties within the proposed CRD boundary that are within the City of Largo limits. The existing community redevelopment area, shown in teal in *Figure 2*, is within the City of Largo limits and extends from the Pinellas Trail to the CSX rail line. This updated FON evaluated the proposed CRD expansion area, within the City of Largo limits, shown in dark blue in *Figure 2*, which expands the existing Clearwater-Largo Road CRD west to approximately Betty Lane.

The 2015 Preliminary Assessment evaluated the proposed sub districts, as seen in *Figure 2*, and provided in greater detail socioeconomic profiles, characteristics and assessed taxable values for each district. The sub districts were developed using the existing Traffic Analysis

Figure 2: Proposed CRD Sub Districts



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Zone (TAZ) boundaries with the exception of the boundary between sub districts 1 and 2. The current TAZ boundary separating sub district 1 and 2 follows 16th Avenue Northwest and 11th Street Northwest. Based on the field analysis, conditions assessment, and the continuing east-west sub districts alignment, this boundary was recommended to be established along Rosery Road Northwest.

To allow for consistency in the analysis, the sub districts developed during the 2015 Preliminary Assessment were used for this study (2020 FON). This document updates the characteristics, taxable values and initial observations for sub districts 2, 3, 4, 5, 6, 7, and 8 areas. The sub districts are used in the assessment to organize the observations and summarize data collected for ease of reference and analysis.

### DATA COLLECTION

An inventory of the planning and physical characteristics of the study area was performed through windshield surveys and readily available data, evaluating existing conditions and trends within the community. Data relative to the study area was provided by the City of Largo and generally includes information relative to the five-year period from 2016 to 2020. The following is a summary of the data collected and reviewed:

- City and County Comprehensive Plans;
- Existing Redevelopment Proposals;
- City Codes and Ordinances;
- City and CRA Design Standards and Land Development Regulations;
- Existing Landscaping, Lighting, Signage and Utility Locations;
- Pinellas County Community Redevelopment Area Policy Program and Implementation Guidelines
- Pinellas County Property Appraiser's Data;
- State/County Transportation Plans;
- Downtown Largo Multimodal Plan;
- Capital Improvement Plans
- Code Enforcement and Building Department Data;
- Crime Statistics;
- Fire, Rescue and Ambulance calls;
- Existing and Future Land Use Data;
- Roadway and Utility Conditions and Work Orders;
- Public Facilities;
- Sanitation and Drainage;
- Neighborhood Characteristics;
- Urban Design Elements

The data collected and reviewed during the updated FON was summarized by sub district and is provided in greater detail in the Sub District Analysis and the Appendix. Upon completion of the initial data collection phase and approval by City staff of the proposed CRD expansion area, a refined summary of findings was performed for only the areas within the proposed CLR-CRD expansion boundary. The FON focuses specifically on data collected relative to the **nine qualifying conditions** consistent with the Florida statutory requirements and the *Pinellas County Community Redevelopment Area Policy Program and Implementation Guidelines*.

The socioeconomic data in this report was obtained from ESRI Community Analyst for 2020; select portions reflect 2018 or later data. Specific to the property valuation data, this information was obtained from 2016 to 2020. The appropriate source and data year are located above each table or image.



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From 2016 to 2020, 19 properties were annexed into City limits within the proposed CRD boundary. For a property to be considered for inclusion into the CRD, it must be contiguous or adjacent to the existing CRD boundaries, or other properties proposed to be included in the expansion. Currently, there are agreements within the proposed CRD boundary. These agreements, with 34 noncontiguous properties, state the City will annex the properties in the future when the property becomes contiguous. If in the future, those properties are annexed into the City of Largo the Preliminary Assessment could be used as a basis for identifying additional areas to be included within the CRD.

### PROPOSED COMMUNITY REDEVELOPMENT DISTRICT PROFILE

The revised CRD boundary, based on the City Commission's recommendations, includes approximately 844 acres total (including the existing and recommended CRD expansion boundary). Approximately 672 acres of this total are located within the City of Largo city limits. The sub district analysis jurisdictional review identifies 934 acres total acres. Approximately 45% of sub district 8 lies within the proposed study area, the total acreage for the sub district jurisdictional review includes acreage for the entire sub district 8 area. Portions of the proposed expansion area include properties outside the City of Largo city limits (i.e., within unincorporated Pinellas County); however, only properties located within the City of Largo will be considered for inclusion in the final CRD boundary. *Table 1* provides a summary of the total number of acres within the proposed CRD expansion area.

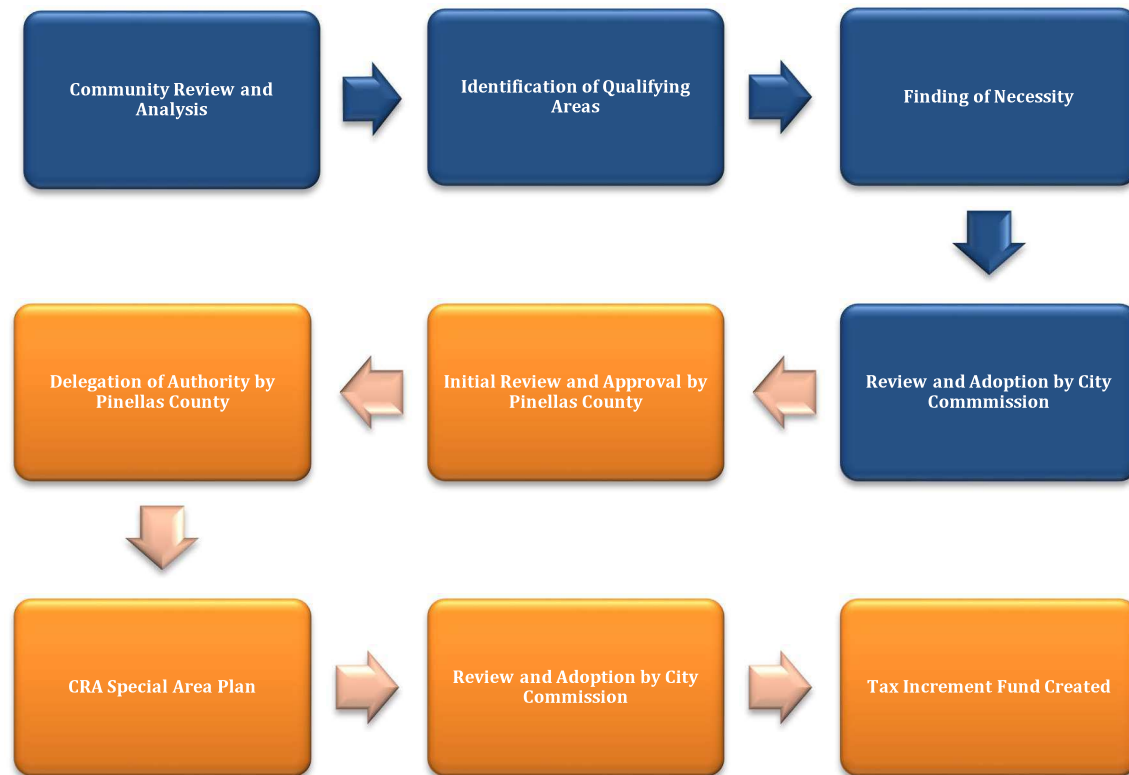
*Table 1: Proposed CRD Expansion Acreage (Source: City of Largo)*

<b>Proposed CRD</b>	<b>Total Acreage</b>	<b>Acreage Within City</b>	<b>Acreage Outside City</b>
Existing	307	307	0
Expansion	537	365	172
<b>Totals</b>	<b>844</b>	<b>672</b>	<b>172</b>

The process for establishing a CRA generally follows the steps outlined in *Figure 1*. This analysis includes the preliminary assessments associated with the Finding of Necessity and is consistent with the regulatory requirements associated with establishing a CRA. The steps indicated in blue represent the FON process; the steps in green represent the master plan phase.

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Figure 1: Process for Establishing a CRA



The State of Florida recognizes the potentially negative impacts to cities created by areas that may be inferior to community standards and quantitative and value-based expectations. These areas tend to be unsustainable and ultimately may become a burden on the jurisdiction in which they exist.

## SOCIOECONOMIC PROFILE SUMMARY

Table 2 shown below is a summary of the socioeconomic profile for the proposed expansion boundary as compared to the city-wide average. The median household income and owner/renter occupied values are lower than the city-wide average.

Table 2: Proposed CRD Socioeconomic Profile (Source: City of Largo and ESRI Community Analyst, 2020)

Category	Proposed CRD Expansion	City Average
Median Household Income	\$ 38,151	\$44,420
Total Households*	1,064	37,174
% Owner and Renter Occupied	54%/56%	60%/40%
Median Age	47.4	51.06
Average Household Size	1.89	2.06

\* 2014 – 2018 ESRI Community Analyst Data

## Clearwater-Largo Road Community Redevelopment District: Finding of Necessity - 2020

### EXISTING LAND USE

Per the Department of Revenue, there are 29 existing land use categories based on 2019 land use codes for the proposed CRD expansion area, including residential, commercial, industrial, automobile, and public uses. The existing land use categories are broken down below in *Table 3*. A map of the existing land uses can be found in the appendix. Total acreage is based on the parcel information provided by the Department of Revenue and does not include roadways.

*Table 3: Existing Land Use (Source: Department of Revenue)*

Category	Total Acreage	Total Percentage
Vacant Residential	0.7	0.21%
Single Family	64	20.64%
Multi-family - 10 units or more	4	1.26%
Miscellaneous Residential (migrant camps, boarding homes, etc.)	0.2	0.06%
Multi-family - fewer than 10 units	4	1.28%
Residential Common Areas	4	1.36%
Vacant Commercial	4	1.42%
One-story Stores	25	8.16%
Mixed Use	1.5	0.49%
Supermarkets	16	5.27%
Community Shopping Centers	20	6.30%
One-story Office Buildings	0.5	0.16%
Professional Service Buildings	1	0.29%
Restaurants/Cafeterias	5	1.41%
Drive-in Restaurants	3	1.04%
Financial Institutions	3	1.08%
Auto Related Uses (sales, rental, repair, storage, service shops, commercial garages, farm and machinery sales and services, marine equipment, trailers, related equipment, mobile home sales, motorcycles and construction vehicle sales)	2.5	0.82%
Parking Lots (commercial or patron)/Mobile Home Parks	87	27.91%
Light Manufacturing	8	2.51%
Warehousing/Distribution/Truck Terminals	9	2.75%
Churches	5	1.68%
Private Schools and Colleges	8	2.58%
Homes for the Aged	0.7	0.24%
Mortuaries/Cemeteries/Crematoriums	9	2.84%
Clubs/Lodges/Union Halls	5	1.72%
Vacant Governmental (including DOT/State of Florida retention and/or detention areas)	0.1	0.02%
Public County Schools - including all property of Board of Public Instruction	9	2.90%
Utilities (gas, electricity, telephone, telegraph, locally assessed railroads, water, sewer service, pipelines, canals, radio/television and communication)	1.5	0.48%
Centrally Assessed	10	3.13%
<b>Total Acreage</b>	<b>311</b>	<b>100.00%</b>

## Clearwater-Largo Road Community Redevelopment District: Finding of Necessity - 2020

### FUTURE LAND USE

Per the City of Largo, there are 13 Future Land Use Categories for the proposed CRD expansion area, ranging from preservation to residential. The 13 categories make up 304 acres. A breakdown of the categories is shown below in *Table 4*. A map of the Future Land Uses can be found in the appendix. Total acreage is based on the parcel information provided by the City of Largo and does not include roadways.

*Table 4: Future Land Use (Source: City of Largo)*

Category	Total Acreage	Total Percentage
Commercial General	89	29%
Industrial Limited	9	3.0%
Institutional	32	10.5%
Residential Office General	1	0.3%
Residential Office Retail	0.5	0.2%
Recreation Open Space	0.8	0.3%
Residential Estate	7	2.3%
Residential Low	21	6.9%
Residential Low Medium	0.3	0.1%
Residential Medium	15	4.9%
Residential Urban	121	39.8%
Transportation Utility	1.5	0.5%
Water	6.0	2.0%
<b>Total Acreage</b>	<b>304</b>	<b>100%</b>

### HOMESTEAD EXEMPTION

An additional item of discussion is the lack of properties receiving a homestead exemption (i.e., those residences/properties qualifying as an owner's primary residence). Based on the analysis, less than 50 percent of the expansion area parcels received this exemption in 2019. A map of properties with the homestead exemption can be found in the appendix.

### OWNERSHIP

Based on parcel data provided by the Pinellas County Property Appraiser, there are 582 parcels within the proposed CRD expansion area. Out of the 582 parcels, there are 528 unique owners including Pinellas County (owns 4 properties) and City of Largo (owns 2 properties). Within the proposed CRD expansion area the average assessed taxable value is lower than the City average property values per parcel based on 2019 tax roll data.

## Clearwater-Largo Road Community Redevelopment District: Finding of Necessity - 2020

### EXPANSION AREA QUALIFYING CONDITIONS

Based on the Pinellas County Board of County Commissioners, there are **nine eligible conditions** developed to evaluate a CRA for the purpose of determining TIF funding. CRD's are scored based on compliance of each eligibility category. A total of 105 points are possible for the nine categories. *Table 5* below depicts each scoring category, criteria scoring range and the maximum possible points.

*Table 5: Consistency with Pinellas County Community Redevelopment Area Policy Program and Implementation Guidelines.*

Conditions	Criteria	Maximum Points
<b>Economic Potential</b>	<b>Employees Per Acre</b>	<b>5</b>
<b>Community Development Block Groups</b>	<b>Majority of CRA within eligible Census Tracts</b>	<b>10</b>
<b>Coastal High Hazard Area</b>	<b>Within Coastal High Hazard Area</b>	<b>5</b>
<b>Median Average Age of Housing Stock</b>	<b>Over/under 35 years old</b>	<b>10</b>
<b>Demonstrated Blight Factors FL Statue 163.340 (8)</b>	<b>6 or more, 3 to 5, 2 or less &amp; FON over 15 years old</b>	<b>10</b>
<b>Unemployment (Civilian Population)</b>	<b>150% Above to Below 110% of County Average</b>	<b>20</b>
<b>Households Below Poverty Level</b>	<b>150% Above to Below 110% of County Average</b>	<b>15</b>
<b>Median Per Capita Income</b>	<b>Not more than 60% to 80% of County Average</b>	<b>15</b>
<b>Median Residential Values</b>	<b>150% Above to Below 100% of County Average</b>	<b>15</b>
<b>Total Points</b>		<b>105</b>

Based on the *Pinellas County Community Redevelopment Area Policy Program and Implementation Guidelines*, classifying a CRA as one of three local designations helps the County to promote investment through TIF by locating priority geographic areas. CRDs are grouped into three local designations based on the total final score of all nine eligible conditions. The following are the descriptions and point ranges for the three local designations.

- **Urban Revitalization: Above 80 points**
  - Most distressed areas with endemic poverty and other CDBG programs with targeted funding
  - Up to 95% TIF for up to 30 years with a 15-year review.
- **Community Renewal: Between 40 and 79 points**
  - Areas with ongoing hurdles and reduced investment/redevelopment; conditions are not as impoverished as the Urban Revitalization areas
  - Up to 75% TIF for up to 20 years with a 10-year review.
- **Economic Development: Below 39 points**
  - Areas with stagnation but opportunities for a diversity of uses, local economy and location
  - Up to 50% TIF for up to 10 years with a 5-year review.



# Clearwater-Largo Road Community Redevelopment District: Finding of Necessity - 2020

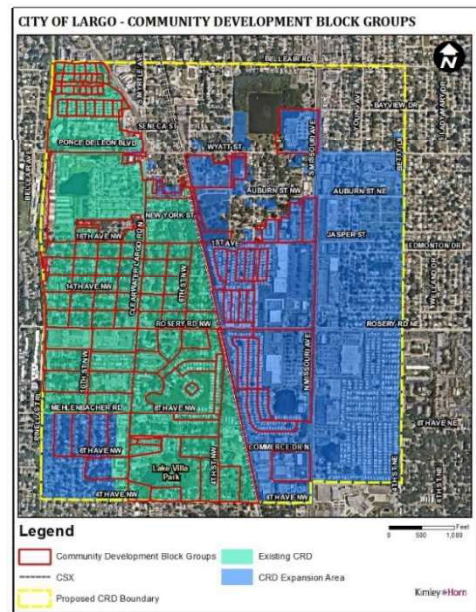
## EMPLOYEES PER ACRE

Based on the 2020 total NAICS Business summary data obtained through the ESRI Community Analyst, there are a total of 1,165 employees within the proposed CRD boundary. The proposed CRD expansion area has a total of 365 acres. For the proposed CRD expanded boundary there are 3.19 employees per acre. **The 3.19 employees per acre falls under the five employees per acre benchmark for the first category, earning the proposed CRD 5 points.**

## COMMUNITY DEVELOPMENT BLOCK GROUPS

The 2020 Qualified Census Tracts, as determined by the Department of Housing and Urban Development, are based off US 2010 Census Data. The first qualifying condition uses census data block groups to determine if the majority of the proposed CRD falls within designated community block development group(s). The community block group data was provided by the City of Largo. As indicated in Figure 4, the proposed CRD expansion area, has approximately 70% within community block groups. The majority of the proposed CRD is within eligible census tracts, earning the proposed CRD the total 10 category points. **The majority of the proposed CRD is within eligible census tracts benchmark for the second category, earning the proposed CRD 10 points.**

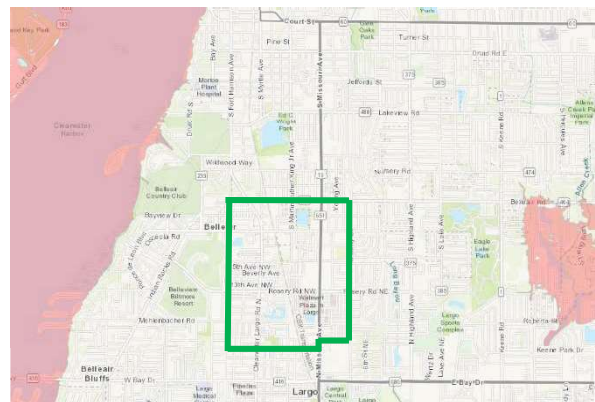
Figure 4: Community Development Block Group  
(Source: City of Largo)



## COASTAL HIGH HAZARD AREAS

As indicated in Figure 5, the current Coastal High Hazard Area (CHHA) Boundary (in red) is located well outside the proposed CRD boundary. The northern part of the proposed boundary contains a limited number of flood zone AE areas, shown in light blue. For this category, the proposed CRD is outside the CHHA and receives zero points. **The proposed CRD is outside the current CHHA zone benchmark for the third category, earning the proposed CRD 0 points.**

Figure 5: Coastal High Hazard (Source: Pinellas County GIS Viewer)



## Clearwater-Largo Road Community Redevelopment District: Finding of Necessity - 2020

### MEDIAN AGE OF HOUSING STOCK

Based on data provided by the City of Largo and the Pinellas County Property Appraiser 2019 tax rolls, the structural age was determined by subtracting the actual year built from the current year. For this analysis, the housing stock structures defined by the Pinellas County Property Appraiser are single-family homes, single-family homes with multiple homes per parcel, condos, multi-family residences (apartments 10 units or more and duplex – triplex- fourplex), vacant residential lots under 5 acres and planned unit developments. This analysis did not include structures defined as recreational/clubhouses, assisted living facilities, boarding houses or stores with offices or apartments. The median age of housing stock for the proposed CRD boundary is 59. For the median age of housing stock category, the criterion is over/under 35-years. **The median age of housing stock falls over the 35 year old benchmark for the fourth category, earning the proposed CRD 10 points.**

### DEFECTIVE OR INADEQUATE INFRASTRUCTURE – MOBILITY AND TRANSPORTATION

#### **Alternative US 19 (SR 595) Corridor Study**

The Florida Department of Transportation District 7 conducted a corridor planning study on Alternate US 19 from Park Street North to the Pasco/Pinellas County line. The study concluded in 2019 identifies several safety related issues along Alternative US 19 at the Rosery Road Northeast and Belleair Road intersections. Issues identified for the Rosery Road intersection include an abundance of access points south of the intersection, business driveways too close to the intersection on south side of westbound approach, and relocation of transit related items (trash cans) to outside the sidewalk area. Issues identified for the Belleair Road intersection include lack of lighting, updates to crosswalk restriping and pedestrian signal buttons. Lane repurposing has been proposed for both intersections to include bicycle lane facilities and additional right and left turn lanes. For Wyatt Street/Ponce De Leon Boulevard and Jasper Street a roundabout is proposed.

#### **Downtown Mobility Plan**

The Largo Downtown Mobility Plan (2010) identified projects designed to improve the bicycle, pedestrian, and transit networks with the overall goal of encouraging multimodal travel citywide. The Rosery Road Improvements were identified in The Largo Downtown Mobility Plan to create a community street and repair the .8-mile corridor stretching from the Pinellas Trail to Missouri Avenue. The improvements are currently ongoing, and a future second phase will provide similar improvements between Missouri Avenue and Eagle Lake Park.

The implementation plan lists seven other projects for the CLR-CRD area, to be phased in through 2035, to increase mobility. Some of the roadways identified needing improvements include, but are not limited to 16<sup>th</sup> Avenue Northwest/Jasper Street, Missouri Avenue, Mehlenbacher Road, and 4<sup>th</sup> Avenue Northwest.

## Clearwater-Largo Road Community Redevelopment District: Finding of Necessity - 2020

### Street Layout

The existing CRD is prone to underlying infrastructure issues that arise through barriers, such as the CSX rail line extending through the study area, large land tracts and neighborhoods that generally reflect or contribute to ongoing deteriorating conditions, poor physical placement, or lack of appropriate facilities. These conditions tend to undermine reinvestment and development alternatives.

Other leading contributors to the underperformance within the expansion area are the minimal public transportation routes, poor parking lot conditions, bad connectivity, minimal sidewalk and bicycle facilities, and poor signage. These and other factors are unfavorable to private reinvestment and a successful economic development environment.

*Figure 6: Barriers to Connectivity*



### Parking

Many of the commercial sites along North Missouri Avenue have expansive parking lots that are outdated and do not include safe pedestrian connections (see Figure 7). Windshield surveys revealed that parking lots were deficient in one or more of the following:

- Overabundance of parking fields;
- Minimal or nonexistent transit stops/shelters;
- Needs striping or re-striping;
- If paved, it is cracked and requires resurfacing;
- Insufficient/no lighting;
- Insufficient/no landscaping
- Large driveway widths;

The location of onsite parking without dedicated pedestrian routes, in front of facilities as opposed to side or rear parking, deny pedestrian priority and related access management issues within the expansion area are elements that require considerable attention.

*Figure 7: Large Commercial Parking Lot*





## Clearwater-Largo Road Community Redevelopment District: Finding of Necessity - 2020

### Public Transportation

The expansion area has minimal public transportation routes (see Figure 8) which generally serve the north and south corridors of Clearwater-Largo Road (Routes 52 and 521 express) and Martin Luther King Jr. and Missouri Avenues (Routes 61 and 18) respectively. Currently there are varying frequencies that range from 20 minutes to one hour. No transfer stations exist within the expansion area. The Florida Department of Transportation corridor planning study conducted on Alternate US 19 from Park Street North to the Pasco/Pinellas County line indicates a high daily number of boardings and alightings along Alternative US 19 from West Bay Drive to Belleair Road.

Figure 8: Existing PSTA Routes (Source: PSTSA)



### Connectivity Issues

Consistent with the analysis and discussion above, there exists connectivity issues between and within properties within the CRD and the expansion area. Due to the large separated land uses as shown in Figure 9 few of the interior sites have pedestrian, bicycle or vehicular cross community connections, particularly within the manufactured/mobile home communities, commercial areas or apartment complexes. In many instances, pedestrians and/or vehicles must leave the community via one access portal/street, and transverse the periphery of the community as well as the commercial development to reach the areas of commerce.

Opportunities exist to connect employment centers along Clearwater -Largo Road with key destinations along Missouri Avenue, including churches and businesses such as the Walgreens, Walmart, and Able Medical Supply, and the Salvation Army store. In addition, adjacent community facilities both within the expansion area and just outside it - including Belmont Park, Ross Norton Recreation Center (just outside of the expansion area) Largo High School, and Ponce De Leon Elementary School – could be part of the connectivity effort.

Figure 9: Large Separated Land Uses with Connectivity Issues



## Clearwater-Largo Road Community Redevelopment District: Finding of Necessity - 2020

### Pedestrian and Bicycle Facilities

As part of the analysis, the team reviewed pedestrian and bicycle facilities within the CRD and how they contribute or detract. In general, very few streets provide a clearly defined pedestrian realm and are more auto oriented. These combined with narrow lane widths lead to increased conflicts between pedestrians and vehicles and also creates additional barriers to pedestrian connectivity.

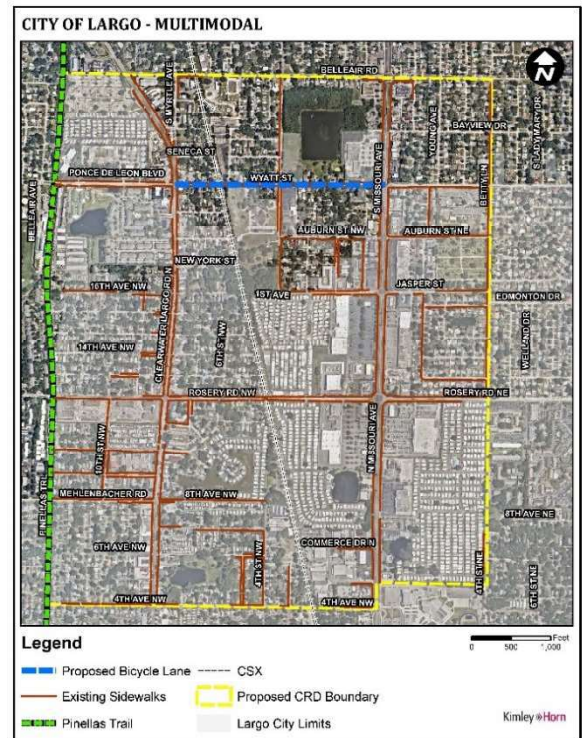
One of the main commercial roadways, Missouri Avenue, lacks streetscape improvements that could improve ease of access for pedestrians and bicyclists. Missouri Avenue has no mid-block crossing facilities, has limited to no buffer between the sidewalk and roadway, needs restriping of crosswalk facilities and has limited landscaping in medians, as indicated in *Figure 10*. In addition, the wide lanes and large parking lots are a crossing hazard for pedestrians and bicyclists.

As indicated in *Figure 11*, sidewalks are generally located along arterial and collector roads, while local roads generally do not have sidewalks or sidewalks are located on only one side of the street. *Figure 11* indicates existing sidewalks in red. The CSX tracks are a west to east barrier, with only Rosery Road providing a continuous sidewalk for pedestrian access. Residential streets have limited sidewalks facilities and streetlights, such as the neighborhoods south of Mehlenbacher Road and west of Clearwater-Largo Road. There are existing sharrows on 4<sup>th</sup> Avenue Northwest and from the Pinellas Trail to Clearwater-Largo Road, Rosery Road beginning at North Missouri Avenue, and Rosery Road from the Pinellas Trail to North Missouri Avenue. Based on data provided by the City of Largo and a windshield survey of the area, there are no other existing bicycle facilities in the proposed CRD boundary. Per the City of Largo, there are capital programmed multimodal improvements to 4<sup>th</sup> Street Northwest. In addition, there is a proposed future bicycle route on Wyatt Street from the CSX rail line to South Missouri Avenue. Based on the City of Largo Forwarding Our Future 2040 Comprehensive Plan, there are long range and proposed bicycle routes on Wyatt Street, North and South Missouri Avenue, South Myrtle Avenue, Clearwater Largo Road North, and Mehlenbacher Road. In addition, there is a proposed and scheduled community trail on Belleair Road.

*Figure 10: North Missouri Avenue Existing Streetscape*



*Figure 11: Multimodal Sidewalk Needs Map (Source: City of Largo)*





# Clearwater-Largo Road Community Redevelopment District: Finding of Necessity - 2020

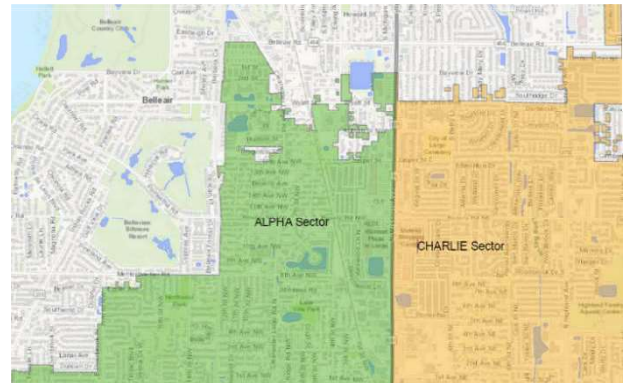
## INCIDENCE OF CRIME IN THE AREA

Consistent with Chapter 163, Part III, F.S., data and analysis are required to find that the redevelopment of the area is necessary in the interest of the public health, safety or welfare. Crime statistics were obtained from the City of Largo for the period between 2019 to 2020 for the City's respective patrol zones and for the City as a whole. The selected data is from the Pinellas County Crime Viewer which includes reports from several law enforcement agencies, including the Largo Police Department and the Pinellas County Sheriff's Office. This data is based upon reasonably available agency information. The City of Largo is divided into three patrol sectors, west, central, and east. The three sectors are divided into smaller districts referred to as dispatch and patrol zones, A-F. The proposed expansion area is within the west patrol sector, dispatch zone A and a portion of central patrol sector, dispatch zone C. Crime statistics for the portion of the study area outside of the city limits was not included in this analysis. *Figure 12* illustrates the Largo Police Dispatch Sector Boundaries within the proposed expansion area. The area shown in green is the portion of the West Patrol – Zone A within the proposed CRD boundary and the area shown in beige is the area of the CRD within the Central Patrol – Zone C sector.

As identified on *Figure 12* portions of Zone A and C are included within the study area. These two zones combined, account for approximately 30 percent of all reported crime within the City for the period 2019 to 2020. Specifically, from 2019 to 2020, these two areas account for approximately 33 percent of reported thefts, 33 percent of reported burglaries, 35 percent of reported assaults, and 34 percent of vandalism/criminal mischief. See *Table 6* for more detail.

The increased incidence of crime and crime related activities can directly contribute to the overall declining health of residents and further deter private investment or reinvestment into necessary economic development initiatives.

*Figure 12: City of Largo Patrol Sectors – A & C  
(Source: City of Largo GIS Viewer)*



*Table 6: City of Largo Crime Data (2019 – 2020)*

OFFENSE	Zone A	Zone B	Zone C	Zone D	Zone E	Zone F
ARREST-RESISTING	61	37	40	69	18	73
ARSON	3	5	1	2	2	3
ASSAULT	371	301	284	339	166	446
ASSAULT-AGGRAVATED	65	42	39	47	27	58
BAKER ACT	6	36	6	12	13	23
BATTERY	4	8	4	8	3	12
BATTERY	0	1	0	0	1	0
BATTERY-AGGRAVATED	0	1	0	0	3	2
BATTERY-SEXUAL	23	22	27	19	8	39
BURGLARY	0	1	0	1	0	0
BURGLARY-BUSINESS	0	0	1	0	1	6
BURGLARY-RESIDENCE	3	2	0	2	6	2
BURGLARY-STRUCTURE	60	57	54	54	40	60
BURGLARY-VEHICLE	1	6	4	3	2	9

## Clearwater-Largo Road Community Redevelopment District: Finding of Necessity - 2020

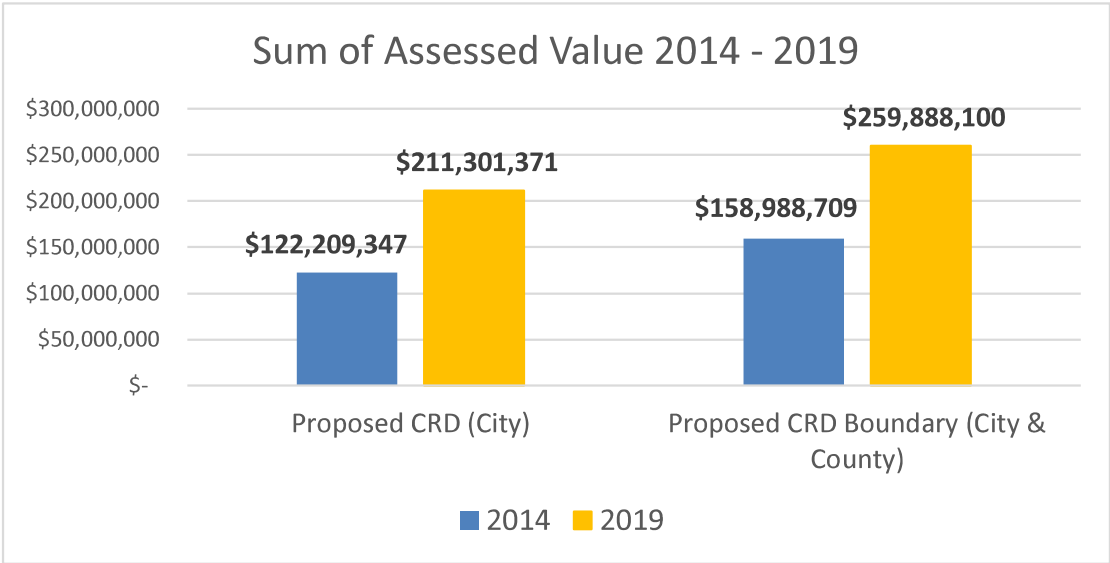
OFFENSE	Zone A	Zone B	Zone C	Zone D	Zone E	Zone F
CHILD ABUSE	13	17	12	13	5	13
DISTURB/DISORD	23	15	22	25	18	38
DOMESTIC	11	6	1	5	4	4
DOMESTIC VIOLENCE	5	15	4	7	10	14
DRUG PARAPHERNALIA	17	17	19	22	8	47
DRUG POSSESSION	96	62	59	70	43	204
DRUG SALE	0	2	0	1	2	2
DUI	25	45	26	50	19	90
FORGERY	24	14	38	45	9	31
FRAUD	152	218	249	211	80	212
HOMICIDE	3	2	0	3	2	1
JUVENILE TROUBLE	0	5	1	1	3	3
KIDNAP/FALSE IMP	6	5	3	5	5	8
LEWD AND LASCIVIOUS	3	9	4	13	2	5
MISSING PERSON	1	5	0	2	1	2
MISSING PERSON RUN	1	2	0	0	0	2
NEIGHBORHOOD TROUBLE	2	2	1	7	3	1
OBSCENITY/ PORN	0	1	0	0	0	0
OBSCENITY/PORN	2	8	39	6		13
PROSTITUTION	2	0	0	0	0	0
PROWLER	3	1	3	3	1	5
ROBBERY-ARMED	0	0	0	1	0	2
ROBBERY-CARJACKING	0	0	0	0	0	1
ROBBERY-UNARMED	18	13	19	19	4	39
SEX OFFENSE	4	3	18	8	3	4
SEX OFFENSE-MINOR	1	66	2	2	0	1
STALKING	0	3	0	1	0	1
STOLEN VEHICLE	29	65	53	55	22	64
STOLEN VEHICLE - REC	0	1	0	0	0	5
THEFT-GRAND	27	38	27	41	20	43
THEFT-PETIT	407	426	385	473	170	515
THEFT-PURSE SNATCH	1		1	2	2	0
THEFT-SHOPLIFTING	63	26	145	166	27	191
TRAFFIC ACCIDENT	18	11	19	24	9	40
TRESPASS	64	48	53	75	51	220
UNDEFINED CATEGORY	394	908	239	469	227	712
VANDAL/CRIM MISCH	112	122	75	98	43	99
WEAPON	11	12	3	8	1	15
UNKNOWN	5	66	11	6	7	42
<b>TOTALS</b>	<b>2,140</b>	<b>2,778</b>	<b>1,991</b>	<b>2,493</b>	<b>1,091</b>	<b>3,422</b>

**Clearwater-Largo Road Community Redevelopment District:  
Finding of Necessity - 2020**

**ASSESSED VALUE**

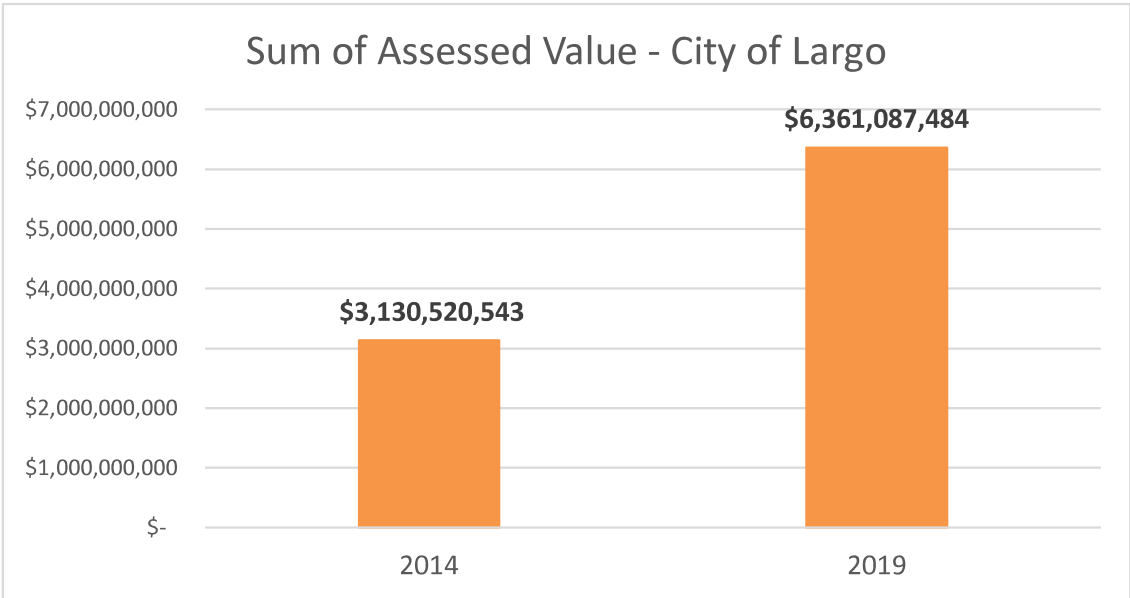
Based on the information obtained from the Pinellas County Property Appraiser, the sum of the assessed value for all City of Largo properties within the proposed CRD expansion area (sub districts 2,3,4,5,6,7 & 8) for 2019 was \$211,301,371, an increase of \$89,092,024 since 2014 as show in *Figure 13*. The sum of the assessed value for all properties within the proposed CRD expansion area (sub districts 2,3,4,5,6,7 & 8) for 2019 is \$259,888,100, an increase of \$100,899,391 since 2014 as show in *Figure 13*. There is a difference in the total number of parcels for the proposed CRD citywide data for 2014 versus 2015 to 2019, which may be attributable to the creation/consolidation of parcels during that time frame.

*Figure 13: Sum of Assessed Value 2014 - 2019 (Source: Pinellas County Property Appraiser & Department of Revenue)*



By comparison, the sum of the assessed value for the City of Largo in 2019 is \$6,361,087,484 an increase of \$3,230,566,941 as shown in *Figure 14*.

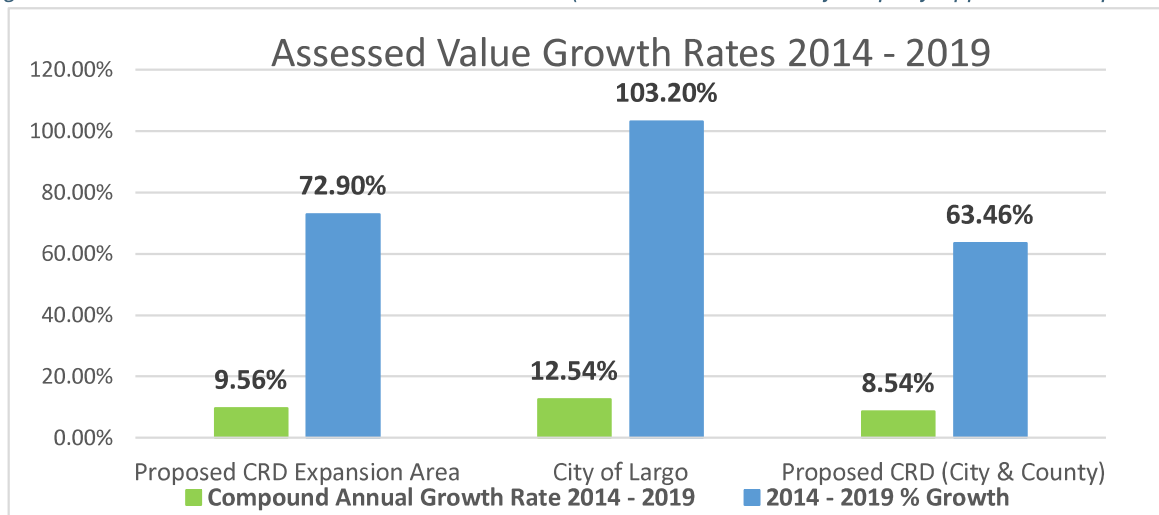
*Figure 14: Sum of Assessed Value - City of Largo (Source: Pinellas County Property Appraiser)*



## Clearwater-Largo Road Community Redevelopment District: Finding of Necessity - 2020

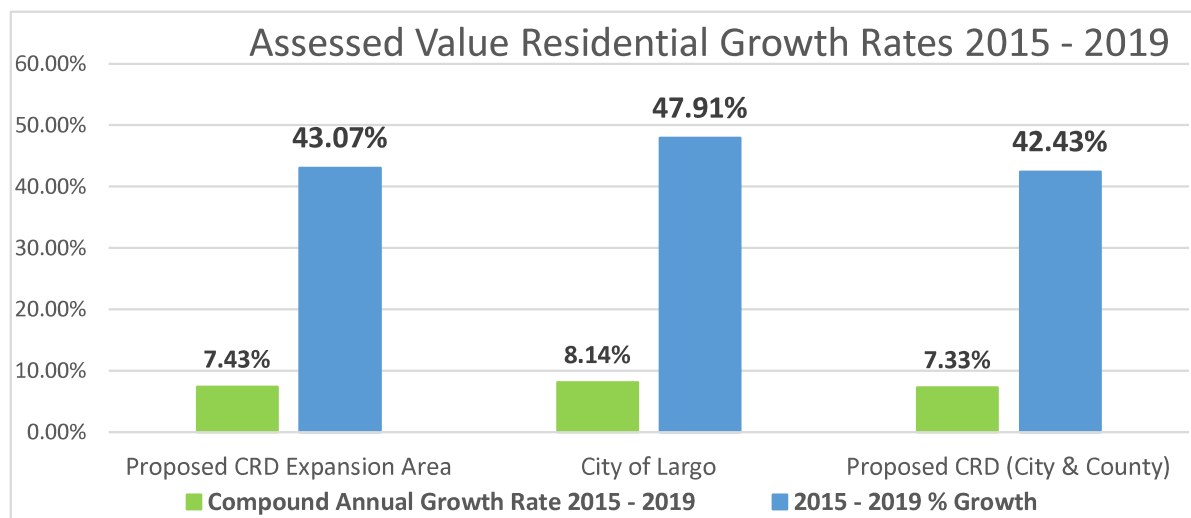
Growth rates were calculated for the proposed CRD expansion area, the proposed CRD boundary (city & county) (sub districts 2,3,4,5,6,7 & 8) and the City of Largo. An overall 6-year growth rate showing the difference in assessed value for the period from 2014 to 2019 (blue) and a compounded annual growth rate for the period 2014 to 2019 (green) is shown in *Figure 15*. For the proposed CRD expansion area, there is approximately a 6-year growth rate of 72.90% and a 6-year compound annual growth rate of 9.56% for the period from 2014 to 2019. For the proposed CRD expansion area, there is approximately a 6-year growth rate of 72.90% and a 6-year compound annual growth rate of 9.56% for the period from 2014 to 2019. **Both of these growth rates are lower than the Citywide growth rates for the period from 2014 to 2019.** By comparison, for the City of Largo there is approximately a 6-year growth rate of 103.20% and a 6-year compound annual growth rate of 12.54% for the period from 2014 to 2019.

Figure 15: Assessed Value Growth Rates 2014 – 2019 (Source: Pinellas County Property Appraiser & Department of Revenue)



Growth rates for residential values were calculated based on 2019 Department of Revenue land use code data. Residential land uses codes used in the analysis include single family, mobile homes, multi-family 10 units +, multi-family < 10 units, condominiums and mobile home parks. There are certain sub districts which may show increased values, albeit on a limited basis, due to construction within those areas, a smaller number of parcels which may be inherently skewed by redevelopment of a single parcel, etc. **On balance, the proposed CRD residential valuations are 7.33% which is less than those experienced city-wide.**

Figure 16: Residential Assessed Value Growth Rates 2015 – 2019 (Source: Department of Revenue)



## Clearwater-Largo Road Community Redevelopment District: Finding of Necessity - 2020

### UNSANITARY OR UNSAFE CONDITIONS

Unsanitary conditions including but not limited to cracked roadway pavement, damaged wastewater pipes, and code violations related to property maintenance (i.e. inoperable cars, high grass, broken windows, and maintenance of a structure) can lead to further deterioration, actual and or perceived, within an area. The City continuously tracks multiple condition inventories for various citywide infrastructure including roadway and stormwater pipes. **Even though the proposed CRD expansion area only accounts for 3.0% of the total City of Largo acreage, the proposed CRD expansion area rates higher than the City in unsanitary and unsafe conditions per the citywide roadway conditions and wastewater conditions inventories.** The following is a summary of roadway and wastewater conditions.

#### Roadway Pavement Condition

The City of Largo provided a roadway pavement condition inventory for roadways within the City of Largo limits. The City of Largo's goal for all roads is to achieve a pavement condition inventory of 75. The score was developed in MicroPAVER using data collected by consultants during three previous surveys conducted over the past decade. **For the proposed CRD area, 41% of roads fail to reach the goal of 75. This is above the Citywide average of 37% of roads failing to reach the goal of 75.**

Table 7: City of Largo Roadway Conditions Inventory (Source: City of Largo)

Section	Number of Road Segments	% of Roads below Goal
Proposed CRD	82	41%
All Largo Roads	1,836	37%

#### Wastewater Condition

The City of Largo provided a wastewater condition inventory based on the Pipeline Assessment Certification Program which is the North American Standard for pipeline defect identification and assessment. For this inventory, pipelines are rated on a 1 to 5 standard with 5 defined as a wastewater pipe needing immediate attention needed and a 1 defined as a wastewater pipe as excellent with minor defects. For this analysis, an average overall pipeline index and an average likelihood of wastewater pipe failure were calculated. **For the proposed CRD expansion area, the average likelihood of failure is 2.47 which is higher than the citywide average likelihood of failure at 2.19. For the proposed CRD expansion area, the average overall pipe index score is 1.74 which is higher than the citywide average pipe overall index score at 1.35.**

Table 8: City of Largo Wastewater Condition Inventory (Source: City of Largo)

Section	Number of Pipe Segments	Likelihood of Failure	Overall Pipe Index
Proposed CRD	55	2.47	1.74
All Largo Roads	2,094	2.19	1.35



# Clearwater-Largo Road Community Redevelopment District: Finding of Necessity - 2020

## FIRE AND EMS

Based on 2016 to 2020 Fire and EMS data received from the City of Largo, there are 5,357 reported Fire and EMS responses within the proposed CRD expansion area. Citywide, there are 134,418 reported Fire and EMS responses. **The proposed CRD expansion area equals 3.0% of the City of Largo total acreage and equals 4.15% of the total Citywide responses.** A map of the Fire and EMS responses within the proposed CRD boundary can be found in the appendix.

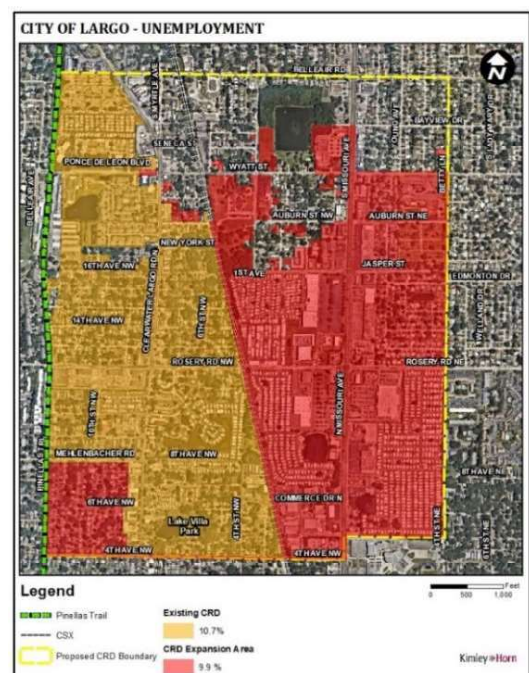
Table 9: Fire & EMS (2016-2020) (Source: City of Largo)

Year	Proposed CRD Expansion	Citywide Minus Proposed	Total Citywide
2020	527	17,822	18,349
2019	1,710	27,013	28,723
2018	1,134	28,620	29,754
2017	1,074	28,142	29,216
2016	912	27,464	28,376
<b>Total</b>	<b>5,357</b>	<b>129,061</b>	<b>134,418</b>
<b>Citywide Minus Proposed Percentage</b>	<b>4.15%</b>		
<b>Total Citywide Percentage</b>	<b>3.99%</b>		

## UNEMPLOYMENT

As indicated in *Figure 14*, the proposed CRD expansion, within the City of Largo limits, has a 2020 unemployment level of 9.9%. The County unemployment average, provided in the draft Pinellas County CRA Priority Scoring documentation provided in 2020, is 5.5%. The unemployment levels for both the existing and proposed CRD are above the 150% County average criterion. **For this category, the proposed CRD meets the criteria for the full 20 points.**

Figure 17: Unemployment Rate (Community Analyst, ESRI 2020)



## Clearwater-Largo Road Community Redevelopment District: Finding of Necessity - 2020

### SOCIOECONOMIC CONDITIONS

Table 10: Socioeconomic Conditions (Community Analyst, ESRI 2020)

Criteria	Proposed District Average	County Average
Households below Poverty Level*	23%	12%
Median Per Capita Income	\$23,783	\$31,960
Median Residential Values	\$97,642	\$178,980

\* 2014 – 2018 ESRI Community Analyst Data

#### Households Below Poverty Line

For the proposed expansion area, the 2014-2018 households below poverty level within the City of Largo limits is 23%. As provided in the draft Pinellas County CRA Priority Scoring documentation provided in 2020, the average County households below poverty level is 12%. The households below poverty level for the proposed CRD is above the County average by approximately 92%. **The high median capita per income ranks the proposed CRD in the highest criterion at 15 points.**

#### Median Per Capita Income

For the proposed expansion area, the median per capita income within the City of Largo limits is \$23,783. As provided in the draft Pinellas County CRA Priority Scoring documentation provided in 2020, the average County median per capita income is \$31,960. The median per capita income for the proposed CRD is below the County average by approximately 74%. **The median capita per income ranks the proposed CRD in the third highest criterion at 7 points.**

#### Median Residential Values

For the proposed expansion area, the median residential value within the City of Largo limits is \$97,642. As provided in the draft Pinellas County CRA Priority Scoring documentation provided in 2020, the average County median residential value is \$178,980. The median residential value for the proposed CRD is below the County average by approximately 55% and the County average is above the proposed CRD by 83%. **The median residential value ranks the proposed CRD in the highest criterion at 15 points.**

# Clearwater-Largo Road Community Redevelopment District: Finding of Necessity - 2020

## CONCLUSION

Based upon an independent assessment of the proposed expansion of the City of Largo Clearwater-Largo Road CRD sufficient criteria have been met to qualify the area for consideration pursuant to the requirements of the Chapter 163, Part III and *Pinellas County Community Redevelopment Area Policy Program and Implementation Guidelines*. As identified in the Conditions of Finding of Necessity and summarized in this Analysis, no less than eight (8) qualifying conditions were present within the proposed CRD expansion area.

The proposed CRD expansion will encourage targeted redevelopment within the designated district to enrich and enliven the street presence through scale, mass, form and activity. The expansion proposes to increase the Clearwater-Largo Road CRD within the City of Largo limits by 365 acres for a total of 672 acres. Portions of the proposed CRA expansion area are located in the northern section of the proposed expansion boundary and include properties outside the City of Largo City limits. From 2016 to 2020, 19 properties were annexed into City limits within the proposed CRD boundary. Properties located within the City of Largo limits will be considered for inclusion in the final CRD boundary. If in the future those properties outside the city jurisdiction are annexed into the City of Largo, the Preliminary Assessment could be used as a basis for identifying additional areas to be included within the CRD.

The FON identified redevelopment challenges of mobility and safety consistent with the *Pinellas County Community Redevelopment Area Policy Program and Implementation Guidelines*. This report focused on the **nine qualifying conditions** outlined in the CRA Implementation Guidelines and Chapter 163, Part III.

These qualifying conditions are:

- 1 **Economic Potential**
- 2 **Community Development Block Groups (within eligible Census Tracts)**
- 3 **Coastal High Hazard Area**
- 4 **Median Average Age of Housing Stock**
- 5 **Demonstrated Blight Factors (Consistent with Florida Statue 163.340(8))**
- 6 **Unemployment**
- 7 **Households Below Poverty Level**
- 8 **Median Per Capita Income**
- 9 **Median Residential Values**

## Clearwater-Largo Road Community Redevelopment District: Finding of Necessity - 2020

Data collected and field visits showed that the study area does have defective or inadequate transportation infrastructure including minimal public transportation routes, uncontrolled access points, disarray of parking, poor street layout or connectivity, poor sidewalk and bicycle connections, and poor signage that lead to limited access to food, health and economic opportunity. Through crime statistics the area also has a higher than city-wide average of incidence of crime. These considerations are factors in the lower property values shown previously in this Report (Socio-Economic Profile) in comparison to the city-wide averages. In conclusion, the **eight qualifying conditions** were described in this report as being particularly deficient within the study area and provide a “Finding of Necessity” and the basis for the recommended Community Redevelopment District (CRD) boundary expansion.

The City and community recognize that sound infrastructure investments, access management, appropriate development codes and incentives for private investment, actions which stem from expanding the existing Community Redevelopment Area and adopting an amended Redevelopment Plan, will contribute to arresting deteriorating economic influences in this area.

The Plan will provide a vision for the CLR-CRD outlining the next thirty years of policy changes and investments. The identified projects will be focused on maximizing the aesthetic, economic and social impact, in a cooperative effort with private investment to become a safer, more livable, vibrant mixed-use district. The CLR-CRD will reinforce the intent established in four key areas or goals by the City:

- Streetscape and Pedestrian Orientation – Connectivity, Mobility and Place Making
- Business Development – Partnering, Collaboration, and Provide Incentives
- Strengthen Neighborhoods –Safety and Accessibility to Education, Employment and HealthCare
- Mixed-Use – Live, Work, Recreate, Educate and Thrive.

By encouraging new public and private investment and other physical improvements and social activities, property values will increase, and the overall community quality of life will improve for Largo, the citizenry and the surrounding Pinellas County areas.

## Clearwater-Largo Road Community Redevelopment District: Finding of Necessity - 2020

### FINAL SCORING MATRIX

Based on the Pinellas County Board of County Commission Policy, there are **nine eligible conditions** developed to evaluate a Community Redevelopment Area for the purpose of determining County TIF funding. **This Finding of Necessity for the CLR-CRD meets eight out of the nine eligible conditions.** CRDs are scored based on compliance of each eligibility category. A total of 105 points are possible for the nine categories. The previous section discussed in detail each category as it relates to the proposed CRD expansion area. The following table shows the final score for each category for the proposed CRD expansion area.

Table 11: Final Score - Pinellas County Community Redevelopment Area Implementation Guidelines

Conditions	Criteria	Proposed CRD Points
Economic Potential	Employees Per Acre	5
Community Development Block Groups	Majority of CRA within eligible Census Tracts	10
Coastal High Hazard Area	Within Coastal High Hazard Area	0
Median Average Age of Housing Stock	Over/under 35 years old	10
Demonstrated Blight Factors FL Statue 163.340 (8)	6 or more, 3 to 5, 2 or less & FON over 15 years old	7
Unemployment (Civilian Population)	150% Above to Below 110% of County Average	20
Households Below Poverty Level	150% Above to Below 110% of County Average	15
Median Per Capita Income	Not more than 60% to 80% of County Average	7
Median Residential Values	150% Above to Below 100% of County Average	15
<b>Total Points</b>		<b>89</b>

The updated FON aims to score the proposed CRD boundary within the urban revitalization category. No less than eight conditions based on the *Pinellas County Community Redevelopment Area Policy Program and Implementation Guidelines* were present within the study area as a whole. Based on Chapter 163, Part III, there are 15 blight conditions. The proposed CRD boundary has met **five** of the adopted blight conditions directly: defective or inadequate street layout and transportation facilities, increase in aggregate assessed values of property in the past 5 years, unsanitary or unsafe conditions, higher incidence of crime and fire and emergency medical service calls compared to the city as a whole (conditions a, b, d, j, and k). The proposed CRD boundary also meets additional blight conditions to a lesser degree (conditions c, e, and m). These additional conditions are evident throughout this report and the sub district analysis for ownership, housing stock, street layout, connectivity issues, code violations, and sub district observations on deteriorating infrastructure, businesses and neighborhoods. **The total points for the proposed Community Redevelopment Expansion area is 89 points; which qualifies the area for the urban revitalization category.**





