



# HOUSING FOR ALL

EXPANDING LARGO'S HOUSING OPTIONS

## RECOMMENDATIONS REPORT

Prepared for:  
**City of Largo, Florida**

**DRAFT**  
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### Executive Summary

The City of Largo undertook the Housing for All Initiative to identify strategies to support development of housing affordable at all income levels in response to the shortage of affordable units. Particular emphasis was given to the possibilities for “Missing Middle” housing as a tool for diversifying the types, sizes and costs of new housing. “Missing Middle” refers to housing that encompasses a range of smaller, multi-unit or clustered housing types that are between the scale of suburban single-family houses and large multi-unit buildings.



The study included an assessment of current and future housing needs, identification of barriers in the City of Largo Comprehensive Development Code (CDC) and stormwater regulations that raise costs or make the development of smaller and more affordable housing more difficult and to develop policy and process recommendations to improve the City's efforts to support affordable housing development. The review also included a detailed review of the processes for helping mobile home park residents facing displacement due to development (will be presented to the City under a separate report).

#### Housing Needs & Projections (Current-2033)

- **One-quarter of all renter households** in Largo spend more than 50 percent of their income on housing (**severely cost-burdened**).
  - 2033 projections **estimate 5,040 renter households** will be **severely-cost-burdened**
- **Owner households** are faring better than renters, but their situation is worsening with **major increases in insurance costs**. **High mortgage interest rates** and **housing prices** make it difficult for first-time homebuyers to find a home they can afford.
  - **By 2033**, 3,370 owner households will be severely cost-burdened.
- **Vulnerable populations** with **higher rates of cost burdens** include **seniors**, **Black households** and **households that include one or more persons with a disability**.
- **Only 10 percent of people** who **work in Largo** also **live in Largo** causing significant commuting for people living elsewhere to work in Largo and vice versa.
- To keep pace with the current countywide population growth rate and replace demolished units, the **City would need to add 2,100 units to the housing stock by 2033**.
  - Highest need is among households earning up to 50 percent of Area Median Income (AMI).

**Conclusion:** Alleviating severe costs burdens will require many different strategies. Increasing the housing supply will help avoid spikes in prices when demand exceeds supply and will allow people who work in Largo to live, work and age in place within the community. Expanding different types of housing can help naturally provide housing at



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different price points. Ideally, City programs and development incentives should seek to focus on alleviating cost burdens of households at 50 and 80 percent of AMI.

### Key Recommendations – CDC Amendments

1. Reduce barriers in the City’s Comprehensive Development Code to allow different types of housing to be constructed.



#### ACCESSORY DWELLING UNITS (ADUs)

- a. Allow ADUs in all residential land uses if it complies with all other CDC requirements.
- b. Allow property owner to live in the main home **or** in the ADU.



#### SMALL-TYPE MISSING MIDDLE HOUSING

- a. 2-4 detached or attached units that can be built on single-family lots and are compatible with house-sized buildings.
- b. Suitable in all residential and mixed-use land uses (currently permissible). Only provide ‘Missing Middle’ Density Bonus in Residential Low (RL) and higher land use categories.
- c. Reduce parking requirement to match the per unit parking requirement for single family homes.



#### MEDIUM-TYPE MISSING MIDDLE HOUSING

- a. 5-12 attached units such as rowhomes and courtyard buildings where the building massing is larger than what would be found in lower-density residential areas.
- b. Suitable in all residential, mixed-use and commercial land uses (currently permissible). Only provide ‘Missing Middle’ Density Bonus in Residential Low Medium (RLM) or higher land use categories (areas closer to main transit corridors).
- c. Allow flexibility in parking standards for properties on transit corridors and within Activity Centers.



#### MOBILE HOMES

- a. Preserve this important source of affordable housing.
- b. Improve flexibility in housing types allowed in mobile home parks to improve resiliency and emergency preparedness while still maintaining neighborhood-scale communities.

#### Land Use Scale

<b>RR</b>	<b>RE</b>	<b>RS</b>	<b>RL</b>	<b>RU</b>	<b>RLM</b>	<b>RM</b>	<b>RH</b>	<b>CN</b>	<b>CG</b>	<b>ROL</b>	<b>ROR</b>	<b>ROG</b>
Low Density Suburban			Suburban		Urban			Urban/Mixed Use				

Note: Largo uses Future Land Use Designations in lieu of “zoning.”





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2. Utilize “Missing Middle” density bonuses (increase in additional units if certain criteria are met) as a method to allow flexibilities in development while simultaneously including affordability requirements and/or design standards.
3. Streamline approval processes for smaller scale (infill) development.
4. Revise affordable housing density bonuses to require units affordable at 50 and 80 percent of AMI, corresponding to the City’s affordable housing needs.
5. Introduce incentives to encourage housing in mixed-use development areas, including Major Activity Centers and Mixed-use Corridors.

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### Other Housing Strategies

1. Improve the transition process for mobile home park residents displaced by redevelopment (addressed in a separate document).
2. Explore creation of new regional stormwater ponds to relieve the need for on-site stormwater retention, allowing better use of existing residential lots.
3. As resources allow, increase City funding for affordable housing.
4. Consider co-location of affordable housing with new City facilities.
5. Encourage use of surplus property in institutional land uses (e.g. property owned by houses of worship, hospitals, educational institutions) to be available for new housing (or mixed use).



## I. Introduction

The City of Largo undertook the Housing for All Initiative to identify strategies to support development of housing affordable at all income levels in response to the extreme shortage of affordable units. Particular emphasis was given to the possibilities for Missing Middle housing as a tool for diversifying the types, sizes and costs of new housing.

Missing Middle refers to housing that encompasses a range of smaller, multi-unit or clustered housing types (such as shotgun, skinny, duplex, triplex, fourplex, courtyard apartment, bungalow court, townhouse, multiplex, and live/work units), which are compatible in scale and design with single-family homes, and are designed to encourage walking, biking, and transit use.

The Initiative has included several elements:

- Assessment of current and future housing needs
- Review of the City of Largo Comprehensive Development Code (CDC) to identify provisions that act to raise the costs of or prevent development of smaller and more affordable housing
- Review of local, state and federal stormwater regulations and their impact on opportunities for infill development and redevelopment
- Testing of Missing Middle housing designs on specific sites to identify issues impacting the potential to develop Missing Middle housing, including financial analysis
- Evaluation of the existing range of City of Largo and Pinellas County density/intensity bonus provisions and incentives for affordable housing and Missing Middle housing
- Detailed review of the processes for helping mobile home park residents facing displacement due to land use changes
- Preparation of handbooks to guide the mobile home park transition process
- Development of a series of policy and process recommendations to improve the City's efforts to support affordable housing development

The study results will be provided in four separate documents:

- *Housing for All Initiative Recommendations* (this report): Provides an overall summary of the study's findings and recommendations
- *Housing Needs Assessment*: Details gaps in the housing supply and unmet housing needs today and in 2033
- *Housing for All Phase 2 Technical Report*: Includes detailed analysis of Largo's Comprehensive Development Code (CDC), evaluation of housing incentives, and recommended revisions for the CDC and mobile home park transitions process that will be used as a guide for drafting code amendments
- *Mobile Home Park Transitions Best Practices Guide*: Designed to aid City administration of the codes that guide developer's responsibilities and support systems for mobile home owners and other park residents facing displacement due to redevelopment or other land use changes.

## A. Housing Needs

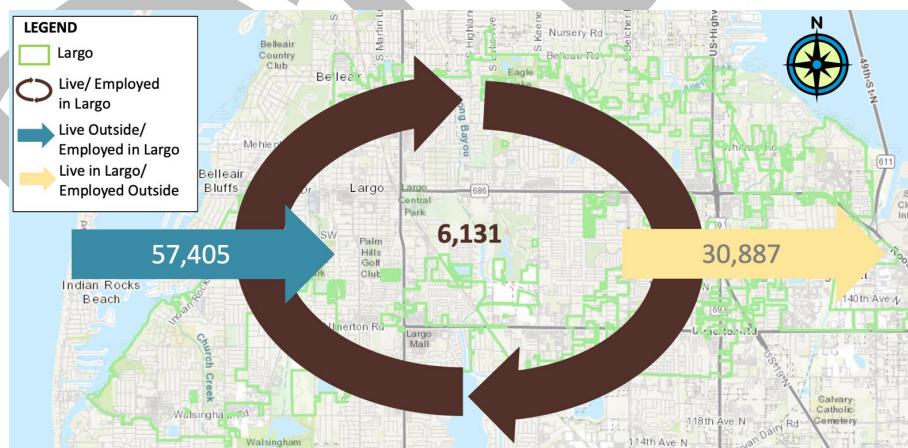
An analysis of current and future housing needs was conducted as part of this initiative. A summary of the key conclusions is provided below. The full Housing Market Analysis & Needs Assessment will be posted on the [Housing for All website](#).

### **Housing construction has not kept pace with the growing demand for Largo housing, leading to escalating rents and prices and a shortage of affordable housing.**

Largo has added an average of 253 new housing units annually over the last five years. The city is almost fully built out with few undeveloped parcels. Assuming that it maintains its historical share of county population growth, Largo's population is projected to reach 85,600 by 2033, a 2.5-percent increase over the 2022 level. The City's 2020 population of 83,252 was below its projection in the City's Comprehensive Plan for 2020, which was projected to be 84,806. Largo's household growth of 4.3 percent from 2010-2020 (1,674 new households) did not keep pace with Pinellas County's growth trend of 6.5 percent. The City would need to add 2,100 new units to accommodate that growth and replace demolished units at a pace of 210 units per year.

### **Many workers employed in Largo cannot afford to live in the City.**

Less than one in 10 of workers in Largo live in the City. St. Petersburg houses 31 percent of its workforce. Pricing out workers has adverse impacts on traffic congestion in Largo and commuting costs for its workforce. Expanding the availability and price points of housing in Largo can help increase the amount of the community's workforce that could live in the City closer to their jobs.



### **Housing costs impact large segments of Largo's households, especially at lower incomes.**

Analyses of housing needs break households among income groups based on household size and the percent of the Area Median Family Income (AMI), which is estimated by the U.S. Department of Housing and Urban Development (HUD) at \$89,400 in the Tampa-St. Petersburg-Clearwater metro area. Fifty-two percent of Largo households fall into the Extremely Low Income, Very Low Income and Low-Income categories. The following analysis references three-person households, which are more common than four-person households in Largo.

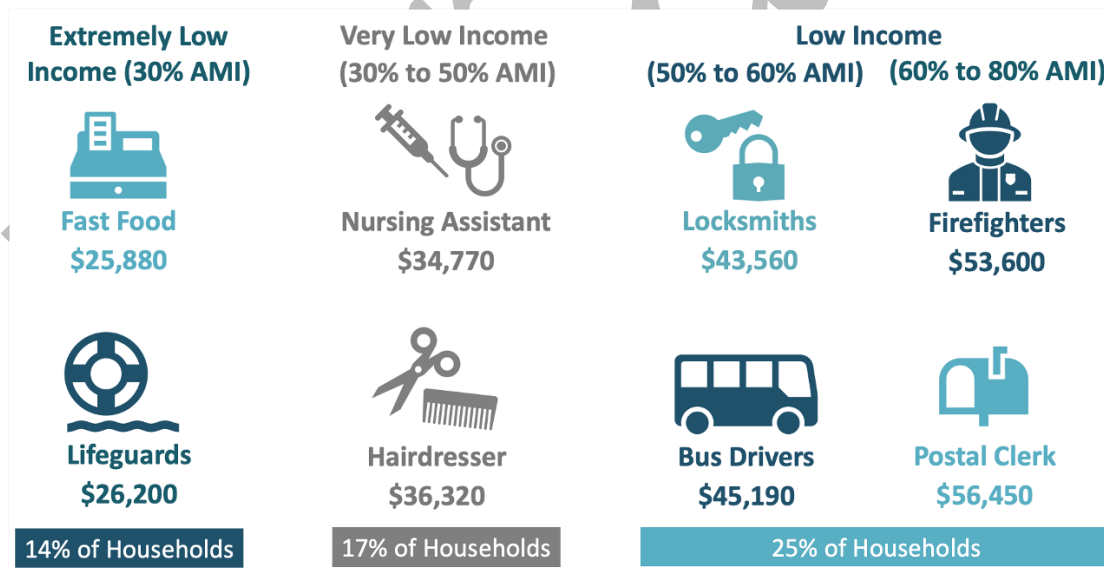


2023 Household Income Level Definitions		
Income Level	Percent of AMI	3-Person Household
Extremely Low Income	30%	\$24,860
Very Low Income	50%	\$39,150
Low Income	80%	\$62,550
Median Income	100%	\$78,260

Note: AMI is Area Median Family Income.  
Source: US Department of Housing and Urban Development, 2023; Florida Housing Finance Corporation, 2023.

The average retiree or person with disabilities living on Social Security Disability Income (SSDI) or Supplemental Security Income (SSI) has income below 30 percent of AMI. Following are examples of occupations associated with the different income levels. They assume a single earner with a family of three working full-time (40 hours per week, 52 weeks per year). However, often workers are unable to find full-time employment. According to the Federal Reserve, retail workers average 30.2 hours per week and leisure/hospitality workers average 25.5 hours per week nationally, whereas the average weekly hours of all employees nationally was 37.5 hours per week<sup>1</sup>.

**Jobs by Income Level for Three-Person Households<sup>2</sup>**



<sup>1</sup> Federal Reserve Economic Data (FRED), St. Louis Fed, October 2022

<sup>2</sup> Few full-time, year-round workers make less than 30 percent of AMI. The occupational wage statistics shown here likely overstate the incomes of fast-food workers and lifeguards, few of which work full-time, year-round.

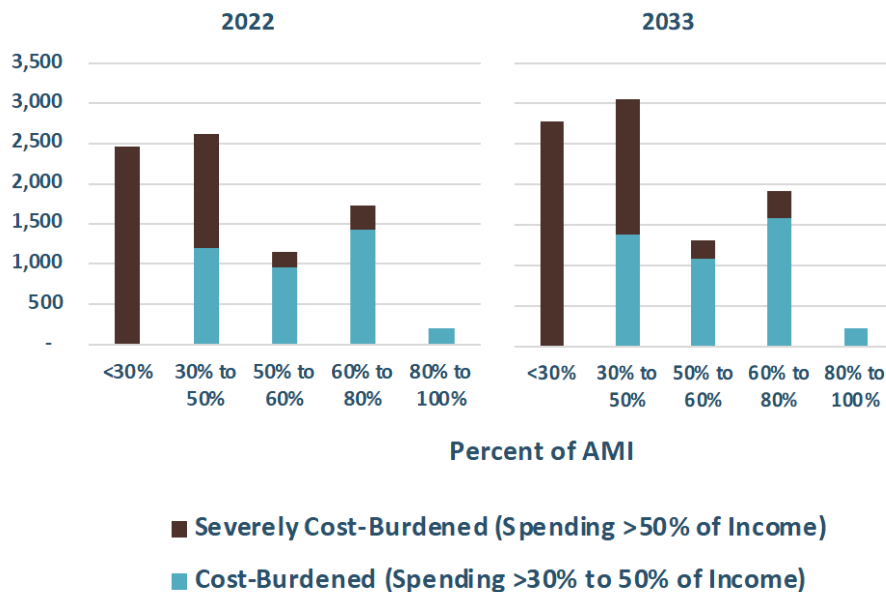
**Affordability is defined as spending not more than 30 percent of gross income on total housing costs, including utilities.**

Households spending more than 30 percent of their income are described as “cost burdened.” Those spending more than half their income are “severely cost burdened.”



**Almost one-half of all renter households in Largo spend more than 30 percent of their income for housing with one-quarter of all renter households severely cost-burdened.** Almost one out of four Largo renter households – 3,930 households at all income levels – spent more than 30 percent but less than 50 percent of their income for housing in 2022; they are considered “cost-burdened.” Twenty-seven percent or 4,410 renter households are “severely cost-burdened,” spending more than half of their income for housing. These ratios are much higher among lower-income households with incomes up to 80 percent of AMI. Projections to 2033 estimate that the number of severely-cost-burdened renter households will reach 5,040 households, a 14-percent increase.

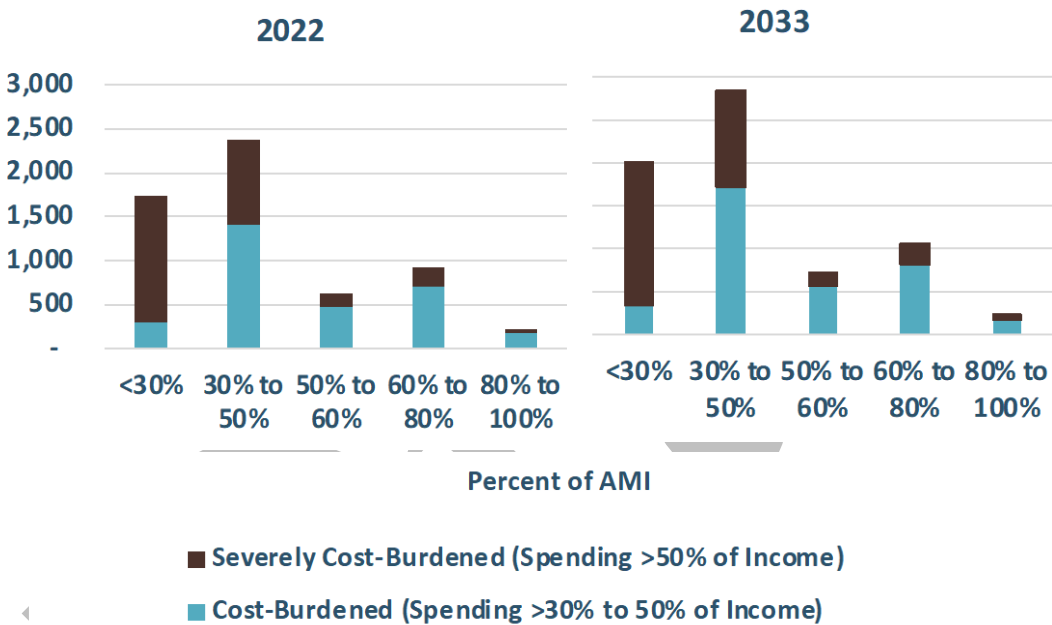
**Largo Renter Household Cost Burdens, 2022-2033**





**Owner households are generally faring better than renters but their situation is worsening with major increases in insurance costs.** Fourteen percent of all owner households spend 30 to 50 percent of their income for housing and 12 percent spend more than half their income. The statewide insurance crisis has restricted the availability of home policies that cover storm damage and caused substantial increases in premiums over the last two decades. These escalating costs are creating even greater affordability problems for many homeowners, particularly those on fixed incomes. With high mortgage interest rates and housing prices, first-time homebuyers are struggling to find a home they can afford to buy. By 2033, severe cost burdens are projected to impact 3,370 owner households – more than 13 percent of all Largo homeowners.

**Largo Owner Household Cost Burdens, 2022-2033**



**Vulnerable populations with higher rates of cost burdens include seniors, Black households and households that include a person with a disability.** Black renter households bear cost burdens and severe cost burdens disproportionately to other racial and ethnic groups. Thirty percent are cost burdened with another 38 percent experiencing severe cost burdens. Cost burdens and other housing problems impact seniors disproportionately. Roughly 80 percent of senior renter households with incomes up to 50 percent of AMI have one or more housing problems (cost burden, overcrowding, or lack of complete plumbing or kitchen facilities). Among senior owner households at that income level, 55 to 65 percent experience one or more housing problems.

Approximately 43 percent of Largo households include at least one member with a disability (overlapping the senior population). Of the 6,300 households with a member who had an ambulatory limitation, 43 percent had one or more housing problem, which was most likely cost burdens. The City's limited supply of affordable housing accessible to individuals with limited mobility will become a growing problem as the senior population grows rapidly over the next decade.

## **B. Housing Goal**

**Over the next 10 years, Largo will need new housing and/or other types of housing assistance for:**

- 2,100 new units to accommodate year-round household growth, seasonal households and short-term rentals and to replace demolished units;
- 4,450 severely-cost-burdened renter households up to 50 percent of AMI; and
- 2,800 severely-cost-burdened owner households up to 50 percent of AMI.

At the same time, the City should be taking steps to preserve existing affordable housing and help to make affordable housing more resilient to disasters.

## **C. Addressing Housing Needs through Missing Middle Housing and Accessory Dwelling Units (ADUs)**

Addressing housing affordability will require many different strategies, including increasing the City's supply of housing affordable at all income levels. Three-quarters of Largo households have only one or two persons, indicating a significant need and demand for units smaller than traditional single-family houses.

American cities and suburbs are very good at providing single-family houses and large multifamily buildings. Historically, urban areas offered much greater housing variety often side by side in the same neighborhoods. Such types of housing as duplexes, rowhomes, and small multifamily buildings sprinkled through a neighborhood allowed it to serve households of different types, at different incomes and at different stages of their lives.

Beginning in the 1930s, planning practices increasingly used zoning laws to segregate housing and development types from each other. Concentration of mass-produced subdivisions dedicated to a single housing type and price range has excluded whole segments of the population from accessing suitable housing. As single-family units have gotten larger and larger, prices have increased and fewer affordable options are available to smaller households that do not need or want a four-bedroom house on a large lot. As families age and the children leave home, there is often no suitable housing that would let the empty-nesters and seniors remain in the neighborhood.

Now that Largo is largely built out with few major tracts of land suitable for traditional large subdivisions, the City needs to encourage more effective use of its land in redevelopment to address the critical shortage of affordable housing.

Greater concentration of housing is also supportive of environmental quality. Sustainability is enhanced when more housing is developed with transit links and/or within walking or biking distance of jobs and services, and fewer workers need to suffer long commutes. Concentrating development in areas with supportive water, sewer and stormwater management systems is much better environmentally than sprawl growth that uses more land and requires more auto use.



## Missing Middle Housing

Opticos Design coined the term “Missing Middle Housing” to refer to the full range of housing types between single-family detached houses and mid-rise apartment buildings, including duplexes, triplexes, quadplexes, townhouses, cottage courts and small multifamily buildings.



## Accessory Dwelling Units

Closely related to Missing Middle housing is the accessory dwelling unit (ADU). An ADU is a separate housing unit, frequently on a single-family lot, created by remodeling or expanding an existing home or by building a freestanding structure or an apartment over a garage. Often referred to as “granny flats” or “in-law apartments”, ADUs are typically much smaller than most housing units (often less than 600 square feet).

ADUs can be an important source of affordable housing that can be provided government subsidy. When rented out, monthly rates can be much less expensive than typical apartments by virtue of their small sizes, their use of infrastructure already in place, and the fact that the cost of the land has already been covered in development of the primary structure. Typically, ADUs are built one at a time and are dispersed throughout a city, minimizing disruption and change to any one neighborhood.

At times, these backyard units or internal ADUs may house the family’s adult children or relatives. The flexibility ADUs provide can allow an aging homeowner to remain in the neighborhood as their housing needs change. The rental income generated can help supplement the homeowner’s income, unlocking some of the value of their home and lot.



**Accessory Dwelling Unit** – a smaller, independent dwelling located on the same lot as a home; an ADU may be internal, added onto the home, or stand-alone

Potential Housing Types

**SMALL-TYPE MISSING MIDDLE UNITS**



**Duplex** – two dwelling units in a building, either side-by-side or stacked



**Triplex** – three dwelling units in a building, either side-by-side or stacked



**Quadplex** – four dwelling units in a building, either side-by-side or stacked



**Cottage Court** – a group of small detached dwellings facing into a shared court visible from the street



**Tiny Home** – small dwelling unit with up to about 400 square feet of living space



**Townhouse/townhome** – attached single family homes – limited height compatible with single family detached homes (*see also “rowhome” in Medium-Type definitions below – project team is continuing to refine the differentiation between these two types*)



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## MEDIUM-TYPE MISSING MIDDLE UNITS



**Rowhome** – a multi-floor dwelling unit built near the sidewalk that shares one or two walls with other units (*see also “townhouse/townhome under Small-Type definitions above)*



**Multiplex** – Single structure with 5-12 apartments



**Courtyard Building** – apartments focused on a shared outdoor open space that is framed by apartments entered through the courtyard



**Live/Work** – combines both commercial space or office and an apartment

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## Other Terms

**Largo Comprehensive Development Code (CDC):** Land use regulations adopted by the City

**Largo Comprehensive Plan:** Long-range (20-year) plan that outlines goals and objectives for City planning (housing, infrastructure, etc.)

**Impervious Surface:** Any hard surface that does not readily absorb or retain water

**Density:** Number of housing units per acre of land

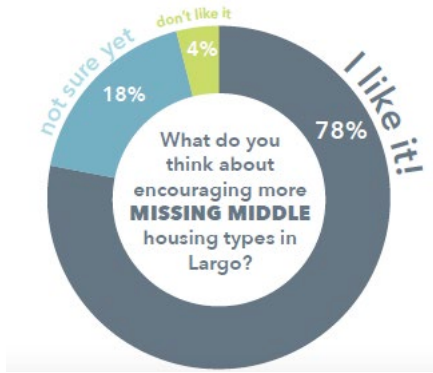


## II. Community Engagement

Throughout the Housing for All Initiative, opportunities for both in-person and online engagement provided input about community priorities and values, which informed the work of the planning team.

### A. Community Kick-off Forum

The Kick-off Forum was the first opportunity for community participation. The meeting began with a short presentation about *Housing for All*, including project goals, timeline, and an introduction to Missing Middle housing types and how they could help the City to meet its goals. After the presentation, participants assembled in small groups to review housing examples and discuss which types could be a good fit for Largo. One representative from each group then reported back to the larger assembly a summary of their conversation.



**COMMON THEMES**  
(preferences of community participants):

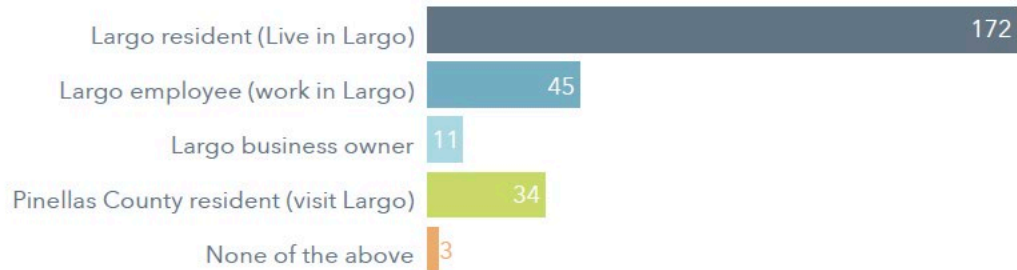
- Variety of housing types placed appropriately; larger buildings on busier streets; allow ADUs
- Affordable / workforce / senior housing
- Housing with green space, in walkable and bikeable communities
- Mixed-use; repurpose commercial space along the corridor
- Include porches, community spaces for stronger sense of community
- Landscaping and design are important with larger buildings that have more units

### B. Housing for All Online Survey

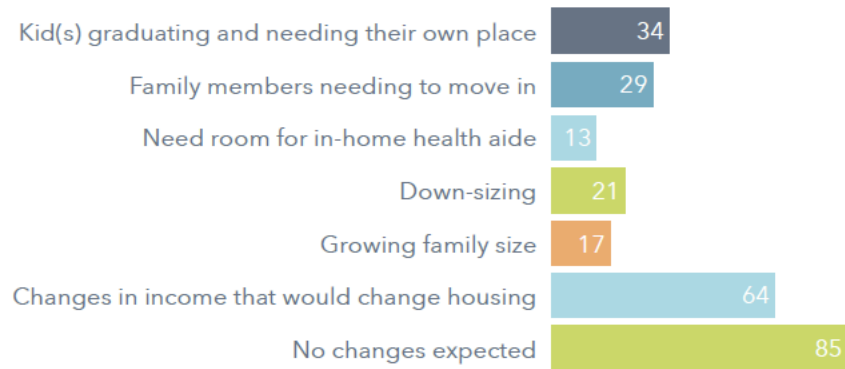
A survey was available on the project website July through September 2023 to gather feedback about housing preferences. Respondents were first asked questions about their current housing

situation and needs (and if they anticipate they will be changing). They were then shown photo examples of a range of missing middle housing types and asked which they would like to see more of in Largo, and what they liked and did not like about the examples. The survey received over 200 responses, primarily from Largo residents from neighborhoods across the city. A sampling of input is summarized here. A fuller reporting of the survey results appears in Appendix A.

**Please select all that apply to you:**



**Do you expect any of these changes in your housing needs in the next 5 years (select all that apply)?**



**Which of these examples of Missing Middle housing would you like to see in Largo? (top responses from online survey)**





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Are there any specific features that you **LIKE** or **DISLIKE** about the Missing Middle housing examples? (sample responses from online survey)

Sense of privacy and ownership with own entry

Having the appearance of a single-family home is very appealing

Legalize adus everywhere in the City

These seem difficult to regulate

Prefer parking in the rear of building

If it's senior living it's great you have close neighbors to chat with

I worry that all of these options for ADUs would be used for Air BNB instead of residential living

Anything that looks more like a house and less like an apartment is good

I like that they are detached and have some traditional features, like a front porch

I'm not crazy about the visual aesthetic of the more modern options for Largo

I would want these only in more urban areas of the city





## C. Second Community Forum

A second community forum was held online via Zoom on October 25, 2023, from 6:00 to 7:30 p.m. The meeting began with a brief presentation to review findings from the housing analysis and community input from the kick-off meeting and online survey. The team then shared site design studies for sample sites in Largo that explored opportunities and barriers to developing Missing Middle housing types and presented draft ideas to expand housing options. These ideas included: expand where ADUs are allowed, define Missing Middle types and where they can be allowed and incentivized, create design standards so that Missing Middle housing can fit the neighborhood context, and review parking standards to be consistent with community goals. After the presentation, small group discussions were held to gather feedback on the ideas; the meeting recording was also posted to the project website for additional viewing and input.

### DRAFT IDEAS TO EXPAND HOUSING OPTIONS:

1. Expand where ADUs are allowed
2. Define Missing Middle housing and where it can be allowed & encouraged
3. Create design standards for Missing Middle housing
4. Review parking standards

What features do you think are most important to consider when thinking about opportunities for Missing Middle housing?

"Affordability ... Location ... Heights & designs should blend in with area ... Design, must fit neighborhood, accessibility, lower price points for rent and ownership, incentives for owners to build ... Not paving paradise ... Design and scope must fit the existing neighborhood, no multi-unit living in single-family areas with exception of ADU ... To keep a neighborhood feel and maintain a small town look while being affordable ... Site design with common areas or common entrances ... Front porch, entrance to lead to sidewalk ... Having a variety of housing styles, sizes, and price points ..."

– Sample of responses from online survey



*Above:* Sample Sites were chosen throughout Largo to illustrate and identify opportunities and barriers for Missing Middle housing types.

### III. Recommendations for Accessory Dwelling Units and Missing Middle Housing

Largo would be well served by the opportunity for a greater variety of housing types and sizes that could meet the housing needs of a variety of households, including the one- and two-person households that form the majority of Largo households as well as seniors and persons with disabilities who need specialized types of housing.

To accommodate smaller units in existing single-family neighborhoods and to help meet the need for smaller, less expensive units, the City should provide for three primary housing types:

- **ADUs**, which are developed one at a time as a new unit or a division of one unit into two. ADUs share a lot with a single-family house and are not considered a full additional unit on a property in terms of density restrictions (units per acre calculations).
- **Small-Type Missing Middle buildings**, close in size to a single-family detached house, could fit easily into neighborhoods of detached homes. These could include duplexes, triplexes, quadplexes, townhomes, small shared co-living quarters, and small bungalow courts (smaller “cottage” style homes with a shared courtyard).
- **Medium-Type Missing Middle buildings** could fit into or near mixed neighborhoods plus anywhere that is suitable for larger multi-family buildings. They could include rowhomes, multiplex buildings with 5 to 12 units and courtyard apartment buildings with up to 12 units.

#### A. Accessory Dwelling Units

1. *Location:*

**Current Barrier:** ADUs are only permitted in the Clearwater-Largo Road and West Bay Drive Community Redevelopment Districts (CRDs).

**Proposed Change:** Allow ADU development citywide on lots with single family homes provided the unit can meet technical requirements that can be outlined and regulated in the CDC.

2. *Design:*

**a. Current Barrier:** ADU cannot exceed the height of the primary structure, which often would prohibit an above-garage apartment or small two-story detached ADU from being built (e.g., ADU with loft).

**Proposed Change:** Allow maximum two stories in height or no higher than the primary structure (whichever is greater). Retain the other design criteria that already exist in the CDC for ADUs.





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**Current Barrier:** The CDC does not allow an ADU to reduce the number of parking spaces (e.g., garage conversion) regardless of how many additional parking spaces exist on the property and regardless of the planned use for ADU. Note: Garage conversion for additional living space for the primary residence is currently permitted in the CDC but requires two parking spaces to be available on the property.

**Proposed Changes:**

- Do not require extra parking spaces for an ADU if the property meets the minimum requirement for a single-family home (currently one space).
- Allow the addition of a parking space if the property owner requests such and provide locational criteria for the additional parking (e.g., parking from alley access if available, etc.).

3. *Occupancy:*

**Current Barrier:** The CDC requires the primary structure to be owner-occupied.

**Proposed Change:** Allow the property owner to occupy either the primary structure or the ADU, which still keeps owner occupancy on the property but allows flexibility if the owner prefers to downsize their own living space.

**Note:** Extensive use of ADUs for short-term leasing could undermine some of the affordability benefits of building these types of units. However, State law limits the City's ability to place controls on short-term rentals unless the City has provided direct support, such as financial incentives for construction.

4. *Affordability:*

**Current Method:** ADUs, due to their small size, are among the most affordable housing in a community. In addition, the State requires property owners to sign an affidavit along with the building permit application stating that the property owner will rent it at an affordable rate to a low- or moderate-income person or persons (up to 120 percent of Area Median Income), which provides some support for these units being used for affordable housing.

**Proposed Changes:**

- Develop financial incentives to help homeowners offset some of the costs of ADU permitting and construction in exchange for an affordability commitment.
- Consider exempting ADUs from development impact fees (e.g., Hillsborough County charges a \$100 "de minimus" impact fee for ADUs). If possible, ADUs should be allowed to connect to the primary unit's utilities.
- Consider loans or grants to offset some of the development costs for ADUs if the owner will commit to long-term affordable rents.
- Establish design standards to guide compatible development. Limit the ADU size to the lesser of 50 percent of the primary structure or 800 square feet.
- Provide pre-approved plans for ADUs to help minimize design and approval costs.

5. *City Development Approval Process:* Continue as with single-family units. Ideally, ADU approvals could be approved administratively without Planning Board or City Commission review.

## B. Small-Type Missing Middle Housing (2-4 Units)

Small-Type Missing Middle housing includes housing types that can be developed on traditional single-family lots in house-sized buildings, including duplexes, triplexes, quadplexes, and cottage courts. Missing Middle Density Bonuses will be provided to allow more units than currently permitted under existing land use classifications.

### 1. *Location:*

**Current Barrier:** Although duplexes and triplexes are generally permitted in most residential, commercial and mixed-use land use classifications, the current locational criteria restrict duplex/triplexes from locating in platted single-family neighborhoods where the housing stock is predominantly single family in nature. Allowable areas for quadplexes, bungalow (cottage courts) courts and small courtyard buildings are not broken out separately from “multi-family” and instead would fall under the same classification as large-scale multi-family developments, even though these types of housing can be compatible with single-family homes.

### Proposed Changes:

- Continue to allow duplexes/triplexes and add allowance for other Small-Type Missing Middle housing in residential, commercial and mixed-used land use classifications and character districts.
- Allow a mix of single-family and Small-Type Missing Middle housing units and Missing Middle Density Bonus for such in all residential land use classifications and character districts except Residential Rural (RR), Residential Estate (RE), and Residential Suburban (RS). See Map 1 later in the report for a depiction of which areas in the City would be suitable for Small-Type Missing Middle and where related Missing Density Bonuses would be permitted (and Medium-Type Missing Middle).

Eligibility for Missing Middle Density Bonuses by General Land Use Scale													
	Low Density Suburban			Suburban		Urban			Urban/Mixed Use				
Land Use Category	RR	RE	RS	RL	RU	RLM	RM	RH	CN	CG	ROL	ROR	ROG
Small-Type Missing Middle	NOT ALLOWED			ALLOWED									
Medium-Type Missing Middle	NOT ALLOWED					ALLOWED							

### 2. *Design:*

**Current Barrier:** In some instances, the minimum lot size for a duplex or triplex exceeds that of the lot sizes of surrounding parcels, which is counterproductive to ensuring that these types of Small-Type Missing Middle housing are compatible in size with surrounding single-family homes.



## HOUSING FOR ALL

EXPANDING LARGO'S HOUSING OPTIONS

### **Proposed Changes:**

- Move away from using higher minimum lot sizes than is required for a single-family home for duplex/triplex (and include quadplex) to encourage neighborhood compatibility.
- Allow some flexibility in applying site standards to projects receiving Missing Middle Bonus Density, similar to the flexibility allowed in CRDs, such as setbacks from property lines. It is important that the incentives not allow development that varies significantly from the established City/community vision, but some permitted deviation (for example, up to a 20-percent difference from established metrics such as setbacks and build-to locations) could allow for greater flexibility in site design and make new housing development more feasible.
- Require form-based or other land development regulations limiting the size and scale of Missing Middle housing to ensure its compatibility with adjacent neighborhood-scale development as well as design features that encourage walking, biking and transit use, such as lower parking standards, reduced setbacks, required sidewalks, etc. in accord with the Countywide Plan rules for Missing Middle Density Bonuses.
- Eliminate the five-year waiting period between demolition of a single-family house and construction of a duplex.

**Current Barrier:** Parking standards are higher for each unit of a duplex/triplex than for a single-family home.

**Proposed Change:** Reduce the parking requirement per unit to no more than required for each single-family home. Consider additional parking reductions in areas along transit corridors and in Major Activity Centers.

**Current Barrier:** State stormwater regulations exempt residential properties with less than five units from on-site stormwater retention as long as the project does not impact or occur over wetlands or surface waters, impede the work of the district, or have an adverse impact on water storage (including impoundments and minimum flows and levels) and water quality. Largo limits the exemption to single-family, duplex and triplex units but not quadplexes.

**Proposed Change:** Extend the City's stormwater retention exemption for single-family, duplex, and triplex units to include quadplexes in accord with State policy while still retaining limits on the extent of impervious surfaces (hard-surfaced area that does not readily absorb or retain water).



## HOUSING FOR ALL

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**Current Barrier:** Duplexes should be included with Small-Type Missing Middle, which will be subject to new design standards. These standards will need to comply with 2021 state legislation that limits certain kinds of architectural and building design standards on duplexes and single-family homes. The state's limitations do not apply in Largo's Community Redevelopment Districts and may not apply elsewhere to duplexes that qualify for density bonuses. The City's Legal Department can confirm this interpretation.



**Proposed Changes:** Create design standards for Small-Type Missing Middle that comply with the state's preemption of certain architectural and building design standards. These standards may include:

- Requirements for a door and windows that front on shaded sidewalks with parking to the side or rear of buildings screened from view of pedestrians;
- Limit the width of buildings to be compatible with the neighborhood;
- Prohibitions on blank wall areas; and
- Encouragement of common design elements such as porches, stoops, and balconies so different housing types fit together.

3. *Affordability:* If a development contains no more than 10 housing units, the units will be market-rate units without any specific affordability commitment. By their size, Small-Type Missing Middle housing units will likely carry lower prices and rents than traditional single-family houses. If more than 10 units of Missing Middle units are proposed under the Missing Middle housing bonus program (see City Development Approval Process below), they would be required to have a certain percentage of units set aside as affordable units in order to take advantage of the density bonus.

The City could require affordable housing density bonus agreements with landowners who use the new Missing Middle Density Bonuses to include language that the unit(s) authorized by the bonus will not be made available for short-term rental. They also could be required to agree not to discriminate against tenants based on source of income used to pay the rent, such as Housing Choice Vouchers, retirement income, veteran's benefits, or child support. Final code amendment language should be reviewed by the City's Legal Department to ensure it is permissible under State statutory preemptions.

4. *City Development Approvals:*

**Current Barrier:** In the development approval process, the CDC treats duplexes and triplexes as if they were multi-family units (requiring full-scale site development plans), complicating the approval process, greatly increasing the associated costs and approval timeframes, and disincentivizing potential developers.

**Proposed Change:** A Missing Middle Density Bonus section would be added to the CDC that would be consistent with Missing Middle Density Bonuses permitted in the Countywide Rules.



## HOUSING FOR ALL

EXPANDING LARGO'S HOUSING OPTIONS

- **Projects with Two to Four Small-Type Missing Middle Units:** Have a streamlined approval process, much like single-family units, with development approvals being completed administratively based on Code criteria.
- **Projects with Five or More Small-Type Missing Middle Units:** These developments would be considered a “subdivision” and require full site plan review process. This would be the case if a developer was building multiple Small-Type Missing Middle buildings in a development (e.g., cottage court with five or more units). Administrative approval could be allowed for the affordable housing density bonus agreements for Missing Middle developments with 10 or more units.

### C. Medium-Type Missing Middle Housing

Medium-Type Missing Middle housing includes rowhomes and multiplexes of 5 to 12 attached units and courtyard buildings, where the building massing is larger than what would be found in lower-density residential areas.

1. *Location:*

**Current Method:** Multi-family development is currently allowed in all residential, mixed-use, and commercial land uses with the main regulating factor for the scale of a development being the density (units allowed per acre) in each land use category. Consistent with current policies regarding density bonuses, no density bonuses for Missing Middle housing could be used in Special Flood Hazard Areas (SFHA) and Coastal High Hazard Areas (CHHA).



**Current Barrier:** The CDC makes no allowance for different scales of multi-family development.

**Proposed Changes:** While multi-family development is allowed in all land uses, the Missing Middle Density Bonuses for Medium-Type Missing Middle housing units would be permitted in Residential Low Medium (RLM) and higher density land uses, and excluded from the following land use categories: Residential Rural (RR), Residential Estate (RE), Residential Suburban (RS), Residential Low (RL) and Residential Urban (RU) as shown in Map 1 below. These higher-density residential categories already allow more units per acre by right, but the Missing Middle Density Bonus in these higher residential, mixed use and commercial categories will provide density options for Missing Middle development that could utilize smaller parcel sites that may not otherwise be able to be developed without land assembly.

Map 1 below identifies the areas where Missing Middle housing could be developed.





# HOUSING FOR ALL

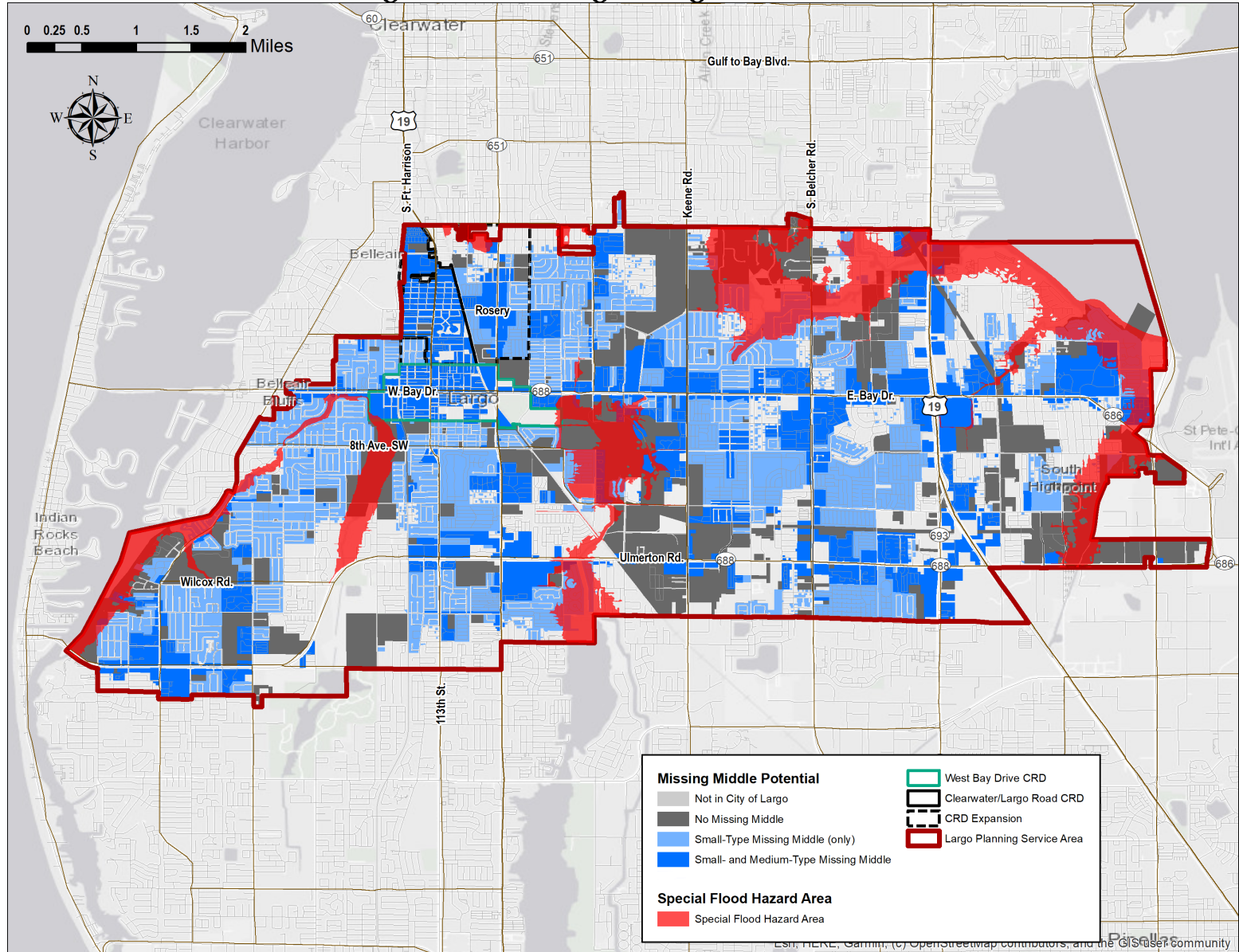
EXPANDING LARGO'S HOUSING OPTIONS

- Light grey on the map indicates land outside Largo’s current city limits;
- Dark grey indicates land that would be unaffected by these changes (such as industrial, institutional, and preservation lands, and the lower-density residential classifications);
- Light blue indicates where Small-Type Missing Middle Density Bonuses would be permitted – which includes all residential land use classifications and character districts except Residential Rural (RR), Residential Estate (RE), and Residential Suburban (RS).
- Dark blue indicates where Small-Type or Medium-Type Missing Middle Density Bonuses would be allowed. The Medium-Type Missing Middle Density Bonuses would be allowed in Residential Low Medium (RLM) and more intense residential, commercial and mixed-use land use categories.
- Red indicates the current Special Flood Hazard Area (SFHA) and Coastal High Hazard Area (CHHA), where the new bonuses would not be permitted.



Eligibility for Missing Middle Density Bonuses by General Land Use Scale													
	Low Density Suburban			Suburban		Urban			Urban/Mixed Use				
Land Use Category	RR	RE	RS	RL	RU	RLM	RM	RH	CN	CG	ROL	ROR	ROG
Small-Type Missing Middle	NOT ALLOWED			ALLOWED									
Medium-Type Missing Middle	NOT ALLOWED					ALLOWED							

Map 1 - Potential Locations for Missing Middle Housing in Largo



2. *Design:*

**Current Barrier:** Because there is no differentiation between size of multi-family development in the current code, smaller sites are held to the same standards as larger parcels. There are 1,028 vacant parcels in Largo; 752 parcels (73 percent) are smaller than 0.5 acres and another 166 parcels (16 percent) are between 0.5 acre and 2 acres. Many of these parcels are along commercial corridors and in Activity Centers. Lot size can also be restrictive for fee-simple Missing Middle housing, such as rowhomes. Although the CDC allows clustering of units (such as for townhouses), which allows each individual lot for a fee-simple unit to be lower than 5,000 square feet, it still requires the same net required amount of land to be provided as part of the common ownership land to make up the differential, thereby still requiring the same overall land size as it would for detached single-family homes. The same is true if a developer wanted to build a cottage court with smaller housing units.

**Proposed Changes:**

- Introduce flexibility in applying site standards similar to those used in CRDs. It is important that the incentives not allow development that varies significantly from the established City/community vision, but some permitted deviation (for example, up to 20-percent difference from established metrics such as setbacks and build-to locations) could allow for greater flexibility in site design and make new housing development more feasible.
- Consider reduction in parking requirements along commercial/transit corridors and within Activity Centers where multiple modes of transportation are available.
- Allow density bonuses (affordable or Missing Middle) to supersede minimum lot sizes for fee-simple developments.
- Utilize similar site design standards such as building widths and parking location standards as stated in the Small-Type Missing Middle section.

3. *Affordability:* Medium-Type Missing Middle housing up to 10 units will be market-rate units without any specific affordability commitment. By their size, most Medium-Type Missing Middle housing units will likely carry lower prices and rents than traditional single-family houses. If more than 10 units of Missing Middle units are proposed under the Missing Middle Density Bonus, the project would be required to have a portion of the units reserved as affordable units.

4. *City Development Approvals:*

Medium-Type Missing Middle developments would be subject to the full site plan review process consistent with current requirements for multi-family development. Administrative approval would be allowed for the affordable housing density bonus agreements for Medium-Type Missing Middle projects.

## IV. Recommendations for Mobile Homes, Manufactured Homes and Tiny Homes

Mobile home parks are the treasured home of many Largo full-time and winter residents, and mobile homes account for 27 percent of Largo’s housing stock. Mobile homes also provide future residents an important source of naturally occurring affordable housing. Yet individual mobile homes are vulnerable to damage from hurricanes, and entire parks and their residents are vulnerable to displacement when redevelopment occurs. Mobile home lot rents have also increased at a faster pace in the past few years similar to increases with other types of rental units.

### A. Definitions

**Current Barrier:** The CDC is not internally consistent in its use of terms regarding manufactured housing.

**Proposed Change:** The CDC would benefit from the consistent use of terms as follows:

- “Manufactured home” would refer to structures that were built to meet the 1976 HUD Code, as amended (to remain consistent with federal terminology).
- “Mobile home” would refer to similar structures built before the HUD Code was created (with the exception of CDC references to Chapter 723, Florida Statutes which does not differentiate between manufactured homes and mobile homes).
- “Mobile home park” would be used to refer to existing parks and subdivisions that currently accommodate manufactured homes and/or mobile homes.
- “Mobile home development” would refer to regulations governing the possible creation of a new mobile home park in Largo.
- “Recreational vehicle” would be defined to match state law.

### B. Future of Existing Mobile Home Parks

**Current Barrier:** The Largo CDC’s current regulations on mobile homes are confusing and contradictory. The CDC does not adequately contemplate or prepare for the future of existing mobile home parks, either after catastrophic damage from a hurricane or as individual mobile homes deteriorate with age. Section 723.041, Florida Statutes does allow a mobile home park to be rebuilt to the same density after a “natural force” (disaster) as existed before the disaster, but this statute is not reflected in the CDC.

Despite the many and varied mobile home parks in Largo, mobile home parks are listed as an allowable use only in the “RU” (Residential Urban) land use classification outside the CRDs. In all other classifications, mobile home parks are not listed as an allowable use. However, many of the existing mobile home parks have more units per acre in the parks than allowed under the RU land use classification.

Additionally, the CDC does not allow mobile home developments and RV parks in Hurricane Evacuation Level A areas as mapped by the Pinellas County Department of Emergency

Management. However, all mobile home parks are required to evacuate when Hurricane Evacuation Level A is required to evacuate (to encourage mobile home residents to be in the first wave of evacuees).

Constraints are even greater for properties within mobile home parks that are not categorized as RU, where replacement of an existing mobile home with another mobile home may not be allowed because it is not considered an allowable use in other land use classifications.

Some small mobile home communities are on city blocks in conventional neighborhoods, comfortably mixing with other dwelling types on adjoining city blocks. The status of these communities is unclear, because Largo's CDC primarily addresses much larger mobile home developments and would not allow these smaller communities to be built today.

**Proposed Changes:**

- Structure CDC policies so as to distinguish those that apply to existing or expanding mobile home parks versus the development of a new mobile home park.
- Designate all mobile home parks that are currently not designated with an RU land use classification in areas currently surrounded by lower-density residential uses with an RU land use classification to allow them to be considered conforming uses.
- Limit mobile home developments and RV parks in Coastal High Hazard Areas and Special Flood Hazard Areas rather than Hurricane Evacuation Level A areas (because all mobile homes are required to evacuate when Level A areas evacuate).
- Clarify the status of small mobile home communities in conventional neighborhoods.

### C. Limits on Replacement of Mobile Homes

**Current Barriers:** The CDC is ambiguous on the right to replace a mobile home in an existing mobile home park with another mobile home.

**Proposed Change:** Remove the barrier to replacing a mobile home with a manufactured home built to meet the 1976 HUD Code outside the Coastal High Hazard Area and Special Flood Hazard Area. At a minimum, removing this barrier would be tremendously useful after a hurricane has destroyed mobile homes.

**Current Barrier:** The CDC does not include procedures for allowing one-for-one replacement of mobile homes in existing parks, particularly those outside Coastal High Hazard Areas and Special Flood Hazard Areas. Once in place, a mobile home cannot be replaced with another dwelling type except on platted lots in the Coastal High Hazard Area. Many dwelling types would not fit easily on most narrow mobile home lots; but other types, such as tiny homes and some modular and site-built homes, could be allowed by the CDC. There is little reason that such an upgrade to a different dwelling type should be categorically forbidden in mobile home parks, especially in the low-lying coastal areas. Mobile home park owners may not wish to allow or encourage these other dwelling types in their parks at this time, but Largo regulations should not continue to be an artificial barrier.



Following a disaster that destroyed multiple mobile homes in an existing mobile home park, more durable structures could be allowed, perhaps required, to replace older mobile homes without changes being required to the CDC or the Largo Comprehensive Plan — and without displacing residents who wish to stay and have the means to upgrade their structures. This would also be consistent with the City’s Sustainability and Resiliency Plan to improve the resiliency of the housing stock.

For affordability considerations, property outside of Special Flood Hazard Areas and Coastal High Hazard Areas may be appropriate for allowing manufactured housing as replacement types for one-for-one replacement of units.

#### **Proposed Changes:**

- To make existing mobile home sites more likely to qualify for replacement homes, apply the Missing Middle Density Bonus for Small-Type Missing Middle housing in the “RU” classification. The explicit intent would be to allow the continued existence of these mobile home parks while facilitating the evolution of their housing stock over time. This density increase would not apply to mobile home parks located within the Coastal High Hazard Area or Special Flood Hazard Area in accordance with the Countywide Rules.
- Another option would be for the City to broach Forward Pinellas about a potential “neighborhood overlay” that countywide could be used over mobile home parks of a certain size to help allow at least the density that is in place, but preserve the sense of neighborhood (on-site recreation, walkable/golf carts, etc.).
- Encourage cottage homes and/or villas with an affordability provision as replacement housing that can maintain the mobile home park sense of community.

### **D. Mobile Home Park Transitions**

The City and State specify a process that mobile home park owners must follow in the event of a land use change to ensure that displaced owners of mobile homes can find affordable replacement housing. A separate document<sup>3</sup> outlines the recommended changes to Chapter 19 of Largo’s CDC, clarifying the process and timeline.

Continue the City’s bonus density incentive to follow the Mobile Home relocation process at five units per acre.

### **E. Preservation of Mobile Home Parks**

Mobile home park preservation at affordable lot rents could protect some of the City’s most affordable units. Many of the existing mobile home parks have developed strong communities around shared amenities and open space that would be lost to redevelopment. Co-op ownership of the mobile home park lots could be encouraged through a partnership with a non-profit like ROC USA to help residents take advantage of their right to purchase the land from the mobile

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<sup>3</sup> See *Best Practices Report* that will be posted on the [Housing for All website](#) when completed

home park owner in the event of a property sale and gain control of their future as a resident-owned community.

## F. Tiny Homes Classification

**Current Method:** At present, the Largo CDC does not specifically allow or disallow tiny homes. Depending on their construction, they might be considered manufactured homes, modular homes, site built or even recreational vehicles. If used as a second unit on a site, a tiny home would be regulated as a duplex or an ADU. The Largo Comprehensive Plan includes a policy to “[e]xplore the options of allowing a greater variety of housing types and sizes, including accessory dwelling units in expanded areas of the City and tiny homes as a possible solution for aging-in-place and affordable housing.”

### Potential Changes:

- Classify tiny homes as a separate type of dwelling in the CDC and then add them to the allowable use tables.
- Alternatively, the location of tiny houses could continue to be regulated based solely on whether they are classified as manufactured homes, site-built or modular homes, or RVs.
- Regardless, the CDC’s minimum building sizes should be eliminated because they are directly contrary to Largo’s housing affordability goals.

## G. Tiny Homes Building Code

**Current Situation:** The Florida Building Code/Residential Code does not have minimum house sizes. Rather, it has minimum room sizes for certain rooms. The large restriction is in the CDC for infill lots which has minimum house sizes. The Florida Building Code/Residential has special provisions specifically for “tiny homes” that have to be adopted separately from the City’s adoption of the Florida Building Code in order to be applicable to tiny houses (up to 400 square feet), however aside from a few certain components that are differentiated in the “tiny home” section, a similar-sized unit can be constructed under the standard section of the Florida Building Code without requiring further adoption of the “tiny home” special provisions. The Florida Building Code requirements apply only to site-built or modular tiny houses used as single-family housing and would never apply to tiny homes that are on a chassis similar to a manufactured home.



### Proposed Changes:

- Encourage the construction of site-built or modular tiny houses that meet the Florida Building Code/Residential Code.

- Modify the CDC to allow tiny houses that are built to federal mobile home standards to be placed in mobile home parks, either on individual lots or as part of a cottage court.
- Remove the minimum house size in the CDC (as indicated in Section F) above.

## VI. Recommendations for Other Increased Housing Options

Encouraging production of a full range of housing types in Largo, targeting potential for new mixed-use development, could help to expand the City’s housing supply.

### A. Overall Housing Densities

**Current Barrier:** Existing mixed-use development standards have limited flexibility, and parking requirements do not recognize the potential for shared parking. Maximum densities may not be sufficient to support mixed use transit-oriented development along transit corridors and urban-scale development in the City’s Activity Centers based on the car-oriented single-use development that is currently occurring in these areas.



**Proposed Changes:** Introduce incentives to encourage housing production in areas/corridors where new mixed-use development is desired, including Major Activity Centers and Mixed-use Corridors such as the Advantage Alt 19 Multi-Modal Corridor. Map 2 on the following page highlights the parcels that could be impacted by such a policy.

Potential mixed-use development incentives for these areas include:

- Lower minimum on-site parking requirements for mixed-use development that includes housing (shared parking).
- Develop new mixed-use design standards that ensure new buildings and site design encourage walkability, including requirements for parking location (to the side or rear of buildings, screened from view of pedestrians), limits on the width of buildings, prohibitions on blank wall areas, and requirements for front door location and shading of sidewalks.
- Extend affordable housing density bonuses to permit higher density in Mixed-use Corridors. Production of a larger number of housing units, even if primarily market rate, will help with housing affordability overall by helping relieve housing supply constraints.
- Consider encouraging housing development in CRDs, Mixed-use Corridors and Activity Centers by using City resources to share infrastructure costs with private developers, including the building of new streets, sidewalks, street trees and other streetscape elements associated with redevelopment.

## B. Live Local Act

**Current Situation:** Florida’s Live Local Act allows owners of commercial, industrial or mixed-use property to redevelop for residential use by committing to maintain at least 40 percent of the units at rents affordable to households at 120 percent of AMI. The housing needs analysis documented the fact that almost all of the Largo households impacted by housing cost burdens have incomes below 80 percent of AMI. Additional units at 120 percent of AMI will have limited value as affordable units.

**Proposed Change:** To reduce the affordability level of some units to 80 percent of AMI, the City could consider offering incentives such as greater density, expedited approvals and/or financial incentives, similar to the City’s recent adoption of the Parkland Impact Fee Waiver for affordable housing serving households up to 80 percent of AMI.

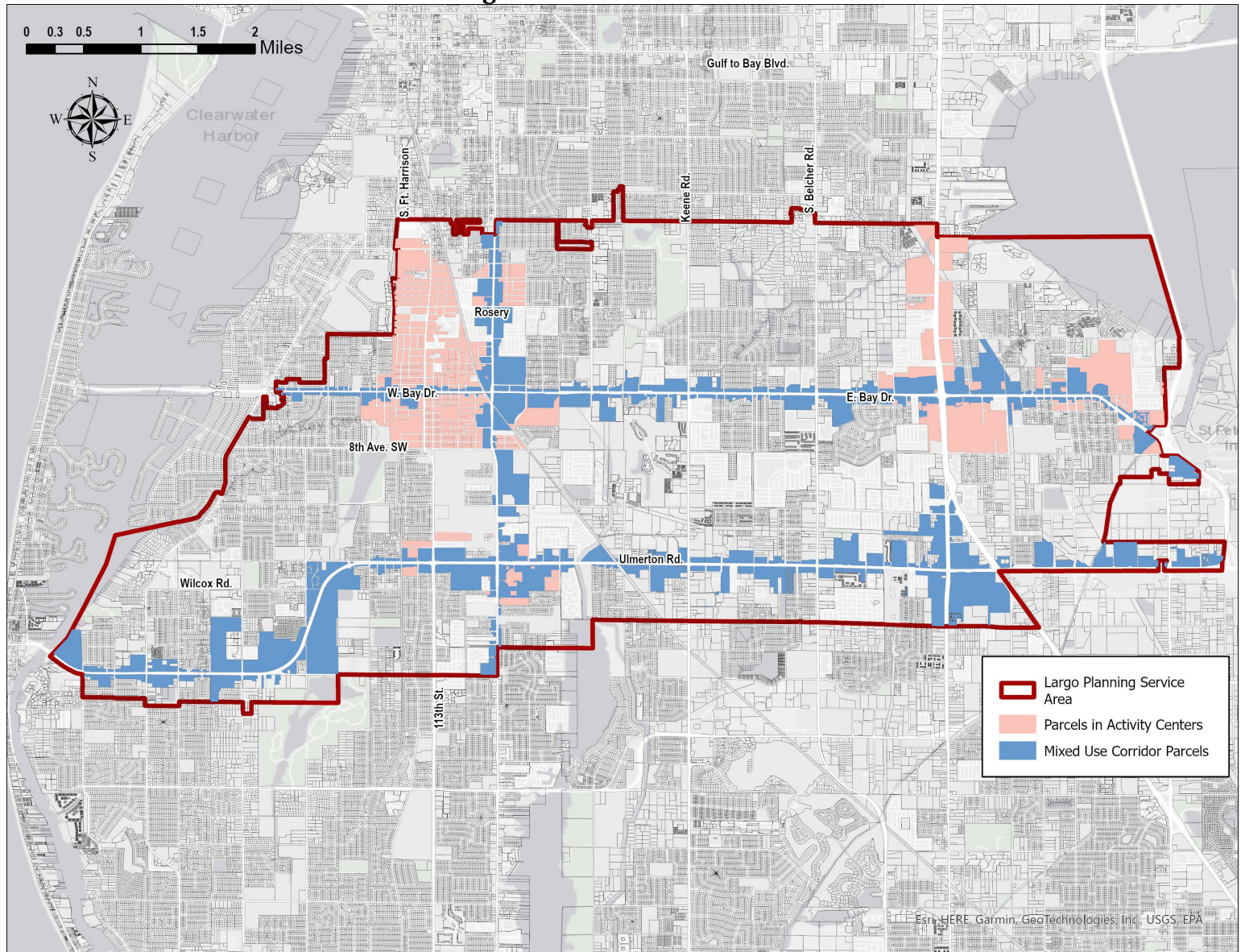
## C. Graywater Bonus Density

**Current Situation:** The State adopted 403.892 F.S., Incentives for the Use of Graywater Technologies, that gives developers a 25-percent density bonus if at least 75 percent of the development will have a graywater system installed or a 35-percent bonus if 100 percent of the development will have a graywater system.

**Proposed Change:** Consider allowing discounts on sewer impact fees to support this sustainable development method as well as expedited processing and fee waivers to encourage developments that are using the State-granted bonus density for graywater use to include some affordable units.



Map 2. Potential Locations for Mixed-Use Housing Incentives





## VII. Additional Recommendations for Affordable Housing

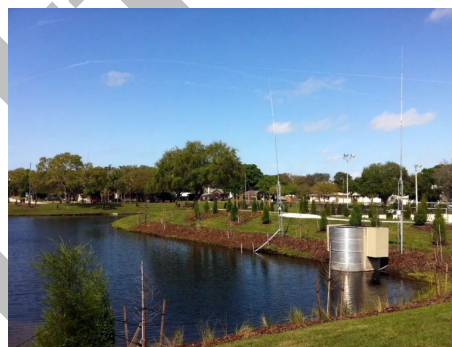
Cutting across ADUs, Missing Middle housing and other affordable housing issues, these additional recommendations address density bonuses, development approval processes, short-term leasing, City funding, provision of land and other issues.

### A. Regional Stormwater Ponds

**Current Barrier:** Requirements for on-site stormwater retention limit the potentials for new housing production, particularly on small lots.

**Proposed Changes:** Shared regional stormwater facilities could remove the need for on-site retention and make residential development feasible on more parcels.

- Undertake a regional stormwater plan to explore creation of new regional stormwater ponds that could relieve the need to retain stormwater on each individual lot, allowing better use of existing residential lots.
- Increase impervious surface ratios on sites located in areas served by a regional stormwater facility.
- Consider on-site retention exemptions in accord with State regulations for small sites (e.g., less than 0.5 acres in size) in the Clearwater Largo Road CRD expansion review to facilitate redevelopment.



### B. Affordable Housing Bonus Density

**Current Situation:** As currently formulated, the City's key affordable housing incentive – bonus density – does not address the City's key housing needs. As discussed in Section I, severe housing cost burdens are largely focused among households at incomes up to 50 percent of AMI. There are minimal cost burdens among households above 80 percent of AMI. The rents affordable to a household at 120 percent of AMI almost equal market rents.

The affordable housing bonus densities offered in the CDC and the Clearwater-Largo Road and West Bay CRDs all target households up to 120 percent of AMI, with Clearwater-Largo Road CRD offering a minor set-aside for units to serve under 80 percent of AMI. The Citywide density bonus (outside of the CRDs) provides density bonuses for housing for 50 and 80 percent of AMI, and the Tri City Small Area Plan provides incentives for developing housing for 60 and 80 percent of AMI.

**Proposed Changes:**

- Adopt a consistent policy, modeled on the Tri City Special Area Plan incentives for housing at 60 and 80 percent of AMI, to be imbedded in the CDC and applied to

CRDs, Major Activity Centers and Multi-use Corridors where higher densities can be supported without unduly impacting low-density neighborhoods.

- Missing Middle housing infill bonus density is essential to allowing more units than now exist. Provide New Missing Middle development with bonus density with developments of more than 10 units required to also meet the requirements of affordable housing bonus density.

## C. City Funding

**Current Situation:** Direct City funding would be the most effective incentive for affordable housing development, but the available City resources are limited. In the context of the City's many budgetary priorities, the City Commission should consider options to increase City funding for affordable housing.

### Proposed Changes:

- Continue to evaluate the effectiveness and efficiency of allocating the City's state and federal housing funds for home renovation for home repairs and energy efficiency upgrades to help preserve existing affordable units, reduce their vulnerability to major storms and reduce energy costs.
- Assist mobile home park tenants displaced by land use changes. State law gives mobile home owners some protections in the event of redevelopment or another land use change, but many renters have few resources to help them transition to other housing.
- Match State and Federal funding sources for rental development (could be loan or grant to development).
- Continue to partner with the County to tap Penny for Pinellas as matching funds for a Low-Income Housing Tax Credit project in the City limits or in unincorporated Pinellas County near Largo.
- Share infrastructure costs to encourage redevelopment, possibly through Tax-Increment Financing in CRDs.

## D. Housing Preservation

**Current Situation:** As the rental housing market tightens and rents increase, the City is facing losses in naturally occurring affordable housing – private housing leasing at rents affordable at 50 or 60 percent of AMI.

**Proposed Changes:** Take steps to preserve the affordability of those units. Multi-year tax abatement and other incentives can be provided in exchange for an additional 10- or 15-year commitment to maintain a share of units at affordable rents. These incentives are most effective when the jurisdiction has the right of first refusal to match the purchase price of a private housing development being sold and then transfer the property to a non-profit for renovation or redevelopment. Explore rental rehabilitation for preserving existing duplex/triplex units and other existing Missing Middle units in the City.

## E. Nonconforming Properties

**Current Barrier:** The CDC's provisions in Chapter 17 inhibit redevelopment of nonconforming properties. Damaged homes must be rebuilt starting within six months or they cannot be rebuilt at all. Many homeowners may still be awaiting insurance settlements at the six-month limit. Given how much of the affordable housing stock is older housing, overly strict nonconforming regulations can work directly against Largo's continuing attempts at providing affordable housing for people at all income levels.

**Proposed Changes:** The nonconforming provisions in Chapter 17 (Nonconforming Lots, Uses & Structures) of the CDC deserve an overhaul, especially on the following subjects:

- Allow small nonconforming lots to use smaller setbacks without requiring individual variances.
- Allow an owner of two adjoining lots to build two homes, instead of deeming those lots to have been converted into a single lot solely because of past common ownership.
- Lengthen the time period for rebuilding severely damaged homes.
- Apply the strictest nonconforming rules only to uses that are or may become actual nuisances, not to benign uses that may no longer be permitted due to simple minor changes in the CDC.

## F. Limits on Short-Term Leasing

**Current Barrier:** Multiple Largo houses and apartments are being rented for short stays, using such platforms as VRBO and Airbnb, thus removing them from the inventory of housing available for monthly rentals or year-long occupancy. The State has preempted much of local government's ability to ban short-term rentals or regulate the frequency or duration of rentals. However, cities may be able to condition direct assistance to a development with contractual requirements that do not apply to all property owners, that includes restrictions on short-term rentals.

**Proposed Changes:**

- Developments receiving direct City assistance through bonus densities or financial incentives could be required to limit use of new units for short-term leasing (recommend legal review for consistency with state preemptions on short-term rentals).
- Largo could require landowners who use bonuses for Missing Middle housing to sign a deed restriction attesting that the unit(s) authorized by the bonus will not be made available for short-term rentals.

## G. Provision of Land

**Current Situation:** Shortages of developable properties in the City constrain development of new housing, particularly affordable housing.

**Proposed Changes:**

- Provide publicly owned lots for affordable housing and/or co-location with City facilities (e.g., recreation centers, fire stations) to reduce a major housing cost factor of land acquisition costs.
- Consider working with local houses of worship and other institutionally designated land owners interested in making their surplus land available for affordable housing development.

## H. Other Housing Provisions

**Current Barrier:** Some local landlords refuse to rent to households with Section 8 Housing Choice Vouchers. Pinellas County’s Tenant Bill of Rights included a provision prohibiting discrimination based on income source; however, the County has concluded the Tenant Bill of Rights has been preempted by a newly adopted Florida law that preempts local governments from any regulation of residential tenants and landlord-tenant relationships.

**Proposed Change:** In situations where Largo provides financial assistance or bonus density, it should use the development agreements to require that the projects that receive assistance may not discriminate based on income source. It is recommended that final language be reviewed by the City’s Legal Department for consistency with state preemptions.

**Current Barrier:** Historically throughout the nation, although not a common occurrence in Largo, many Black families were not allowed to register their property ownership to ensure legal title. They relied instead on informal processes of passing their homes to their children without the legal protections and rights that come with clear title. The current owners of “heirs’ properties” are prevented from participating in many assistance programs, such as home renovation assistance, and even insuring their property. Clearing title to the properties typically involves a lengthy legal process to identify and contact all living heirs that might have a claim on the property.

**Proposed Change:** Continue to explore options for programs to help owners of heirs’ properties clear the title to their properties to allow them to access assistance programs and insurance to continue their homeownership.

## VIII. Priority Next Steps

In moving ahead with the Housing for All Initiative, priority next steps could include:

- Adopt revisions to the CDC by December 2024
  - Allowable Use Table
  - Supplemental Standards
  - Consistency with terminology
  - Nonconforming property provisions
  - Affordable housing bonus density provisions
  - Chapter 19 treatment of mobile home park transitions
- Recommend Missing Middle housing concepts and other housing strategies for potential consideration in the Clearwater-Largo Road CRD plan update currently underway.
- Identify provisions pertaining to the West Bay Drive CRD and the Largo Mall Activity Center that could be used for staff reference in using the “alternate design process” allowed in these areas until such time as the City updates the plans for these areas.
- Educate the public and developers as to the value of adding smaller Missing Middle housing units and the opportunities created by the CDC revisions – code workshop for training.
- Undertake a Regional Stormwater Management Plan to identify opportunities for regional stormwater management facilities that could support new infill development.
- Identify City surplus land or joint development opportunities.
- Identify more streets suitable for on-street parking.
- Develop policies for implementing the Live Local Act.
- Develop programs to assist homeowners with ADU development and consider providing sample plans for ADU's and Small-Type Missing Middle development (e.g., duplexes).