



April 7, 2026

City of Clearwater Government

RE: Research and Review of Sunshine LLC's Plan for The Landings

Dear Mayor, City Council, City Manager, Asst. City Manager, Parks Director and Planning Director

As the Chair of the Conservation Committee for Suncoast Sierra Club and as a resident of Clearwater, I was asked by the Sierra Club Executive Committee and by Clearwater residents who live near The Landings to research and review the unsolicited bid by Sunshine, LLC to transform seventy acres of city owned park and green space known as the Landings Golf Course (see Exhibit A) into a commercially operated "Sports, Recreation and Entertainment Complex. (See Exhibit B.)

The research and review conducted identifies many problems and deficiencies with the plan as presented beginning with a review of important language in Clearwater's City Charter, as it relates to land use. I then researched and reviewed Clearwater's Comprehensive Plan 2045 in detail and found many unacceptable deficiencies with the plan as it relates to many goals and objectives clearly defined in the Comprehensive Plan. Let's begin with the City Charter's "new use" requirement on municipally owned land.

I. Clearwater City Charter

City Charters are like the "municipal constitution" and are legally binding. Clearwater's City Charter language is clear in Subpart A, Section 1.5 , as it reads: **"No municipally owned real property which was identified as recreation/open space on the city's comprehensive land use plan map on November 16, 1989, or at any time thereafter, may be sold, donated, leased for a new use, or otherwise transferred without prior approval at referendum..."**

In the words of the developer Sunshine, LLC, they "propose transforming this site into a Sports, Recreation, and Entertainment Complex". Transforming a "municipally owned" public golf course with natural, green open space into a commercially operated multi-sport complex is clearly a "new use". Therefore, as presented, this plan would require approval by the voters in a city wide "referendum". To avoid a city-wide referendum, the planned development and use of the property would require the plan to be scaled back significantly in order for it to maintain a similar land use.

II. Clearwater Comprehensive Plan

Let's look at Clearwater's Comprehensive Plan 2045, adopted in 2024. Comprehensive Plans are mandated by Florida Statute Chapter 163, Part II. Like City Charters, Comprehensive Plans are legally binding and act as a "constitutional guide for local growth and development". All development, zoning changes, and building permits are required to be consistent locally adopted Comp Plans.

A. Parks and Open Spaces Chapter - The following goals and objectives are quoted from the Parks and Open Space Chapter in the Comp Plan. Ask yourself if the plan conforms to each goal and objective below. An answer is provided based on the plan presented.

1. **Goal PPP 1. Equitable Design.** Does this plan **"Promote the equitable design of trails, open spaces, parks and recreation facilities to make it safe and easy for residents to be physically active, regardless of their age, race, ethnicity, income, ability, or disability."** **"**No. The user costs the commercial operator is asking the public to pay to use the sports facilities will be unaffordable for most city residents. Second, there's a concern the sports complex focuses too heavily on youth sports and is not an equitable design for the large population of retired residents living in the community.
2. **Goal PPP 2. Parks Facilities** Does the plan for this municipally owned parkland help to **"Ensure that trails, open spaces, and parks and recreation facilities are located throughout the city."** No, under this development plan, this city owned park will lose 70 acres of green open space and trails to a 1,500-car parking lot, a sports stadium, restaurant, swimming pool and 13 multi-use synthetic fields. This plan eliminates any opportunity for a nature park with trails in this part of Clearwater.
3. **Goal PPP 3. Natural Features Preservation** Does the plan: **"Preserve and expand natural features of the city."** No, the plan will eliminate most if not all natural features in the seventy acres of city parkland.
 - a. Does it **"Preserve natural open space areas which constitute aesthetic or ecological community assets."** No, this development plan will virtually eliminate the natural open space and cut down scores of mature, healthy trees. The ecological community assets within the seventy acres of this parkland will be lost.
 - b. Does it **"Preserve, enhance, and maintain the city's existing and future trails, open space, and park and recreation facilities."** No, this development plan will virtually eliminate any opportunity for walkable and natural open space for residents to enjoy in this part of the city.

B. Conservation and Coastal Management Chapter - The following goals and objectives are quoted from the Conservation and Coastal Management Chapter in the Comp Plan. Ask yourself if the plan conforms to each goal and objective below. An answer is provided based on the plan presented.

1. **Goal CCM 1. Conserving Natural Resources** Does the plan: “**Continue to protect, enhance, and conserve natural resources within the city to provide for the long-term accessibility, enhancement, safety, economic viability, and environmental integrity of those resources.** No, this plan will pave and develop over most of the natural resources on what is the only tract of natural city-owned parkland of this size in the city. The plan would replace nearly all the natural resources with parking lots, a stadium, a pool, a restaurant and 13 synthetic ball fields.

- a. **Objective CCM 1.3** Does the plan: “**Continue to protect, maintain, enhance, and manage wetlands, estuaries, wildlife habitats, conservation areas, and city-owned lands that are in their natural state from unnatural disturbances or adverse impacts from development.**”

No, this plan on city-owned parkland will eliminate the last large tract of natural green space. The plan will disturb or remove three retention ponds and nearly 100 mature, healthy trees in place since 1970 that a variety of wild birds and aquatic animals depend on for habitat. Residents in the local community have come to enjoy this rare open space, and its peace and comfort.

- b. **Objective CCM 1.3.8** Does the plan: “**Continue to protect and recognize the importance of natural ecosystems and city parks as integral parts of the city’s urban environment.**”

No, the plan will develop and disturb all the natural open space in this city park with a large impervious parking lot, a stadium, restaurant and 13 artificial fields. The plan would need to integrate a substantial tree buffer and sound wall along the perimeter to “protect” the residents living in the apartment complex adjacent to such a sports complex.

- c. **Objective CCM 1.3.9** Does the plan: “**Coordinate recreation planning with other plans concerning water quality, stormwater management, fish and wildlife management, and environmental education.**”

No, the plan will develop and pave roughly 75% of the seventy acres with impervious surfaces that would require enormous drainage and stormwater management

challenges. The plan does not show topography, details about onsite drainage, stormwater management and where runoff will flow offsite. The best onsite stormwater management practices would be required to not adversely impact downstream communities or increase localized flooding. An environmental impact assessment must be conducted to satisfy this requirement.

- d. **Objective CCM 1.3.10** Does the plan: “**Continue to designate environmentally sensitive wetlands, floodways, or other environmentally significant areas with the Preservation (P) future land use category and zoning district.**”

No, the plan as presented does not show watersheds, waterways or drainage systems on the seventy-acre property. The Landings is located at the headwaters of three local watersheds: Stevenson Creek, Allegator Creek and Allens Creek. The best onsite stormwater management practices would be required, to not increase localized flooding downstream in any of the three local watersheds. This large tract of natural green space naturally charges groundwater and aquifers in the watersheds. Developing and paving over the natural green space will provide major stormwater management challenges. An environmental impact assessment must be conducted to satisfy this requirement.

- e. **Objective CCM 1.4** Does the plan: “**Continue to protect all city-owned and maintained potable water wells from contamination and conserve current and future water sources.**”

No, as presented, the plan does not show water utilities or potable water consumption for a large-scale, commercially operated sports complex, which will require supplying large quantities of potable water for its customer base, especially during the summer months. The plan does not include a hazard assessment of the old decommissioned municipal dump site at the northern corner of the seventy-acre site, which was an active dump site until the late 1960s. A professional hazard assessment of the decommissioned dump site must be conducted, and any groundwater contamination or hazardous leachate must be mitigated.

Conclusion:

For the reasons previously stated, the plan for a “Sports, Recreation and Entertainment Complex” as presented by Sunshine, LLC is a significant new land use for this municipally owned parkland. According to the City Charter, Subpart A, Section 1.5, the plan, as presented, requires a referendum.

Furthermore, as previously stated, the plan has many deficiencies for not conforming to the goals and objectives in the Parks and Conservation Chapters of the Clearwater Comprehensive Plan 2045; adopted in 2024. *(Note: This report does not include a review of the Transportation Chapter.)* An aerial view (see Exhibit C) of Clearwater's urban sprawl environment around The Landings shows how rare and special the seventy-acres of natural open space is for the citizens of Clearwater. A legal and legitimate plan would conform to the Parks, Conservation and Transportation Chapters in the Comprehensive Plan. A development of this magnitude on city parkland requires a professional and comprehensive environmental assessment to ensure conformance to the Comprehensive Plan.

It is strongly recommended that Sunshine LLC's plan be rejected and sent back to the drawing board, because of how much it conflicts with the City's Strategic Plan and Comprehensive Plan. There are just too many nonconforming elements and deficiencies with this unsolicited plan. Clearwater governments desire to lease a for-profit business expansion onto this very special municipally owned parkland and highlights inconsistencies with the City's Strategic Plan, as well as the Comprehensive Plan. During the City's internal review of any plans that involve for-profit business expansion on municipally owned parkland, it must be consistent with the City's Strategic Plan and Comprehensive Plan 2045. An internal City review should involve resolving such inconsistencies.

Finally, it is highly recommended that the City of Clearwater form an ad hoc citizen's committee to assist the city in doing a thorough review of this plan or any other plan of this magnitude on municipally owned parkland. An ad hoc committee with local citizen stakeholders involving diverse residents and small business owners could be formed with the goal of arriving at a consensus on a plan that is both reasonable and consistent with the City's Strategic Plan and Comprehensive Plan.

Sincerely,



Tim C. Hughes

Sierra Club - Suncoast Group

Conservation Committee Chair

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<https://www.sierraclub.org/florida/suncoast>



"Non-profit serving the greater public good"

Exhibit A: Aerial view of The Landings Golf Course (2026 Google Maps)

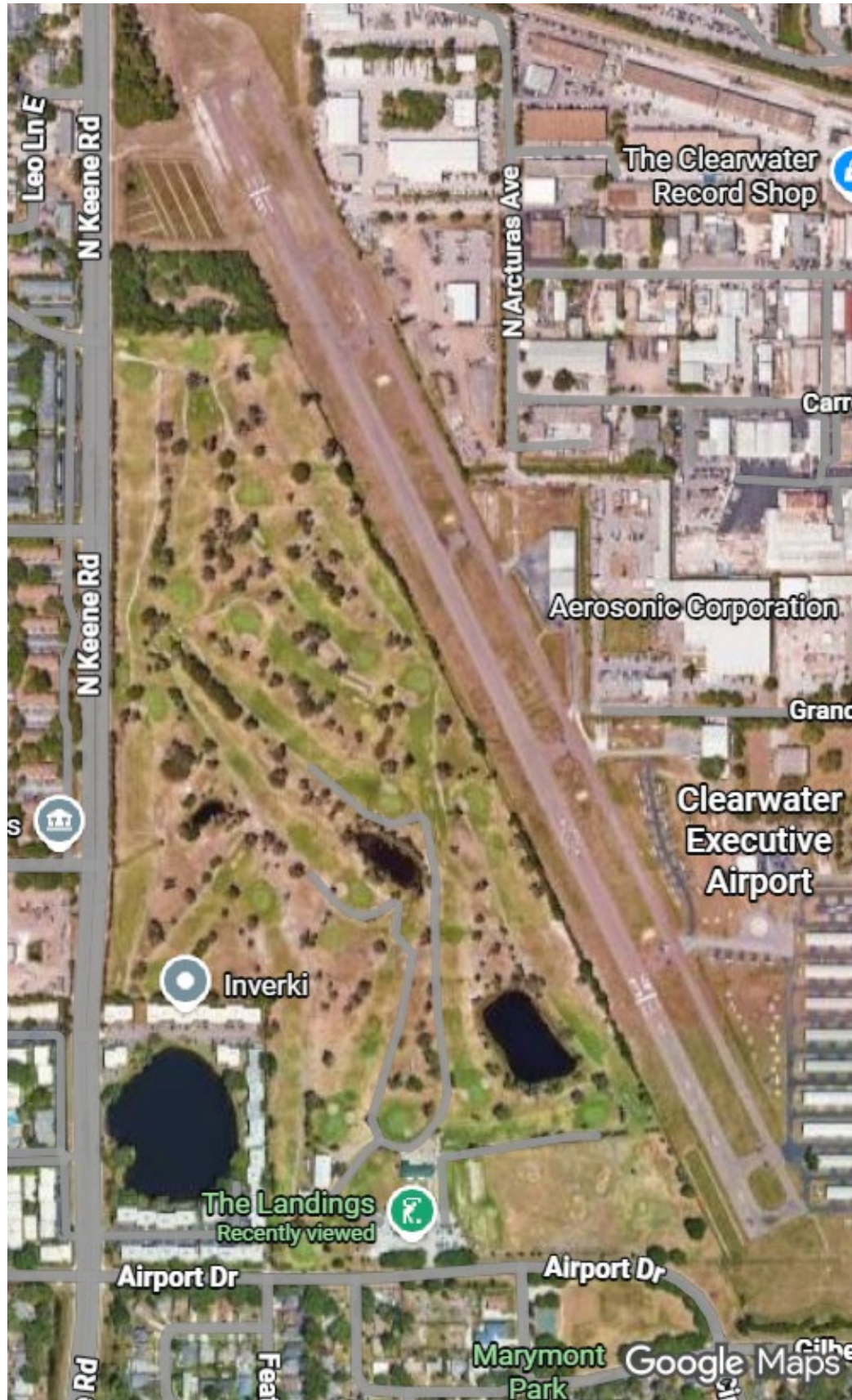


Exhibit B: Rendering of Sunshine, LLC Sports Complex development plan



1 SITE PLAN

FISHER
ARCHITECTS
P.L.L.C.

CLEARWATER, FL

10.10.2026

SRE SPORTS COMPLEX
DESIGN DEVELOPMENT MASTER PLAN

Exhibit C: Panview of Clearwater's dense urban sprawl (2026 Google Maps)

