

Land Use Equivalency Matrix (LUEM) Residential Exchange Policy

Manatee County, Florida | Discussion Proposal

Purpose

Request: County staff to review the continued use of Land Use Equivalency Matrices where approved commercial, office, or lower-intensity residential entitlements may be exchanged for additional or higher-intensity residential development. The objective is not to eliminate reasonable flexibility within long-term planned developments, but to determine whether current exchange provisions adequately preserve the residential/nonresidential balance originally contemplated and remain appropriate under today's growth and infrastructure conditions.

Why a Review Is Appropriate

Existing Manatee County LUEMs demonstrate that the same amount of commercial entitlement can produce materially different residential outcomes depending on the development and the trip-generation assumptions incorporated into its approved matrix. Several matrices expressly derive their conversion factors from PM peak-hour traffic generation. While broader development review can address utilities and other public-facility impacts, traffic equivalency alone does not necessarily measure the long-term planning value of retaining commercial and employment-generating land uses.

- Commercial-to-residential exchanges can add permanent population while simultaneously reducing nearby employment, shopping, and service capacity.
- Project-specific LUEMs can yield substantially different residential quantities from the same amount of surrendered commercial entitlement.
- Residential product exchanges can also increase development intensity even when the overall exchange remains permissible under an existing matrix.

Illustrative Manatee County Examples

The following examples normalize selected approved LUEM rates to show the residential entitlement associated with surrendering 100,000 square feet of commercial/retail space. They are illustrations, not a claim that every development may use the same rate.

Development / Example	SF Detached per 100,000 SF	MF / Attached per 100,000 SF	Basis / Observation
Gateway North / Artisan Lakes	709	966 MF apartments	May 2021 LUEM; conversion formulas based on PM peak-hour trip generation.
Parrish Lakes	371	598 apartments 714 condo/townhome	ITE 9th Ed.; adjacent-street peak hour between 4-6 PM.
Lakewood Centre	721	388 multifamily	Approved LUEM: 1,000 SF commercial = 7.21 SF or 3.88 MF units.
Northwest Sector (2024 exchange)	—	~388 MF*	124,000 SF commercial contributed 481 MF units; combined with 88 SF units for 606 MF total.

*Approximate normalized commercial component: 481 MF units / 124,000 SF commercial ≈ 388 MF units per 100,000 SF.



Requested Staff Evaluation

I request that staff evaluate the following three policy options and return recommendations for potential Comprehensive Plan, Land Development Code, development-order, or other appropriate amendments:

1. Limit Commercial / Employment-to-Residential Exchanges

Evaluate substantially reducing or, where appropriate, prohibiting the conversion of approved commercial or employment-generating entitlement into additional residential units. At minimum, consider whether residential-producing exchanges should require a higher standard of review than exchanges that preserve or increase nonresidential uses.

2. Establish a Commercial / Employment Retention Floor

Evaluate requiring planned mixed-use developments to retain a defined minimum percentage of their originally approved commercial, office, or employment-generating entitlement. The purpose would be to prevent cumulative exchanges from materially changing an approved mixed-use development into a predominantly residential project.

3. Control Exchanges to Higher-Intensity Residential Uses

Evaluate separate limitations on exchanges from single-family or other lower-intensity residential products to multifamily, attached, or otherwise higher-intensity residential development when the exchange materially increases unit count, population, or public-service demand.

Suggested Review Criteria

In evaluating these options, staff should consider whether an LUEM exchange should demonstrate more than traffic equivalency. A modern review could consider the resulting development mix and cumulative effects on:

- Transportation and internal trip capture
- Potable water / wastewater and stormwater
- Employment and neighborhood-serving commercial
- Schools and permanent population
- Fire, EMS, sheriff, parks and recreation
- Fiscal / tax-base and land-use balance

Policy Direction

The requested review would preserve flexibility for legitimate changes in market conditions while recognizing that commercial and employment-generating entitlements have community value beyond their PM peak-hour trip rate. The central question is whether a traffic-based equivalency should continue to permit substantial additional residential entitlement when doing so materially changes the approved balance of uses.

Suggested staff tasking: Inventory active Manatee County LUEMs; identify the age and methodology of their conversion factors; compare commercial-to-residential and residential-intensity exchange provisions; evaluate current ITE assumptions where applicable; and return options for a consistent County policy addressing residential-producing exchanges.

Source Notes

- Manatee County Ordinance 21-06, Gateway North (Artisan Lakes) DRI - May 2021 LUEM; PM peak-hour trip-generation basis.
- Manatee County Ordinance 17-36, Parrish Lakes DRI #28 - LUEM based on adjacent-street peak-hour traffic and ITE Trip Generation Manual, 9th Edition; includes minimum/maximum development ranges.
- Manatee County Ordinance 20-01, Lakewood Centre DRI #27 - approved LUEM including commercial-to-residential conversion factors.
- Manatee County August 22, 2024 public hearing notice, Northwest Sector DRI #26 - exchange of 88 single-family units and 124,000 SF commercial for 606 multifamily units.
- Manatee County 2026 Parrish Lakes public notices - illustrate ongoing amendments to residential and nonresidential entitlements.