



April 30, 2019

Mrs. Becky Ayech, President
Miakka Community Club
15800 Wilson Road
Sarasota, FL 34240

Re: Application for Comprehensive Plan Amendment (CPA 2019-C), a publicly-initiated amendment to the Future Land Use Map (FLUM) series for approximately 6000 acres located northeast of Fruitville Road and Verna Road from a designation of Village/Open Space Resource Management Area (RMA) to Rural Heritage/Estate RMA under the optional 2050 Plan policies.

Dear Mrs. Ayech;

On March 21, 2019, Planning Services received the above referenced application for CPA 2019-C. It is an application for a publicly initiated Comprehensive Plan Amendment submitted pursuant to Chapter 94, Section 94-85 of the County Code. The requested change involves "Map 8-1 RMA-1: Resource Management Areas from Sarasota 2050 Plan" and "Map 8-3 RMA-3: Village/Open Space RMA Land Use Map from Sarasota 2050 Plan", both of which are from the FLUM series as listed within FLU Policy 1.1.2.

Publicly initiated Comprehensive Plan Amendments require Sarasota County Commission (Board) authorization prior to being fully processed. The initial step requires that County staff establish a proposed scope for the amendment and identify potential issues. A public workshop on the proposed scope is then required prior to obtaining a recommendation from the Planning Commission for the Board on whether the proposed amendment should be processed or not. The application along with the scope and all public comments and the Planning Commission recommendation are then presented to the Board for their determination on whether to proceed with the review of the CPA application.

The Development Review Coordination (DRC) staff have reviewed the material submitted with the application, and the listed agencies below hereby provide the following comments at this time:

PLANNING SERVICES / LONG RANGE (William Spaeth) 861-5207, wspaeth@scgov.net

Fundamentally, the suggested change being proposed by the application submitted involves residential capacity for which the optional 2050 Plan policies were primarily adopted to address. The request reduces the optional density and intensity of development that could be derived from the +/- 6000 acres designated for the Village/Open Space (V/OS) RMA at the northwest corner of Fruitville Road and Verna Road. The optional RMA system of the 2050 Plan is an incentive-based policy for managing growth in the County out to the year 2050.

This application sets forth a rationale as to why the subject area should be encouraged to maintain the existing land use pattern established by the Miakka Community area, and presents it within the context of the RMA "Ideals". The assertion is that the Rural Heritage/Estate (RH/E) RMA is a more appropriate designation that more closely maintains the rural character of the land uses in the Miakka Community area. Those portions of the following 2050 Plan policy highlighted below were specifically addressed within the application in support of this application for a CPA.

Staff's initial review of this application's sufficiency is provided within two sections:

- **Planning Section One – Application statements and staff comments; and**
- **Planning Section Two – Application response to foundational concerns with applications for a CPA.**

Planning Section One – Application statements and staff comments.

RMA Policy 1.1 Resource Management Area Ideals (RMA Ideals)

The Resource Management Area Map, depicted in Map 8-1 RMA-1, is an overlay to the Sarasota County Future Land Use Map. The Resource Management Areas are designed to:

- *Preserve and strengthen existing communities*
- *Provide for a variety of land uses and lifestyles to support residents of diverse ages, incomes, and family sizes, including housing that is affordable to residents at or below the median income for Sarasota County*
- *Preserve environmental systems*
- *Direct population growth away from floodplains*
- *Avoid Urban Sprawl*
- *Reduce automobile trips*
- *Create efficiency in planning and provision of infrastructure*
- *Provide County central utilities*
- *Conserve water and energy*
- *Allocate development costs appropriately*
- *Preserve rural character, including opportunities for agriculture*
- *Balance jobs with housing*

The additional development opportunities afforded by the Sarasota 2050 Resource Management Area Goal, Objectives and Policies are provided on the condition that they are implemented and can be enforced as an entire package. For example, the densities and intensities of land use made available by the Sarasota 2050 Resource Management Area Goal, Objectives and Policies may not be approved for use outside the policy framework and implementing regulatory framework set forth herein.

RMA Policy 1.1 - Preserve and strengthen existing communities.

Applicant Statement:

Old Miakka was founded in 1850. This community predates Sarasota County. Old Miakka, with the assistance of Sarasota County planners, prepared a Neighborhood Plan which defined the boundaries of Old Miakka as Hwy 70 to the north, Myakka River State park to the south, the County line to the east and Cow Pen Slough to the west. Property owners in the above area were notified by Sarasota County and were asked to participate in the Neighbor Plan. One strong statement in the plan was to NOT HAVE COMMERCIAL DEVELOPMENT UNLESS IT WAS AGRICULTURALLY RELATED i.e. NO STORES.

A community is not defined by the whims of current property owners as to inclusion or exclusion. A community is defined by its history. In planning, communities are also identified by the service area (our Fire Department) or a natural boundary (Cow Pen Slough). The existing hamlet overlay protrudes into the Community of Old Miakka. Hamlets allow for commercial development.

Hamlets are urban/suburban development. "Specifically, suburban cluster concepts are inapplicable to rural areas because of their unique issues related to rural character and lifestyles, environmental protection, and compatibility with agriculture."

Hamlets are supposed to preserve open space. "Our interviews indicated, however, that opponents of cluster developments (read hamlets, added) believe the open space will not be permanent and, eventually, be more development will occur..." Think Foxfire or Sarasota Golf Club which are now housing developments instead of the promised open space. Additionally, open space can be stormwater ponds.

Staff Comment:

The Hamlet form of development doubles the density and intensity of the land use from the Rural designation on the Comprehensive Plan FLUM. This application attempts to make the case for recognizing the even lower density and intensity levels that exist in the Miakka Community area, which is lower than the FLUM designation of Rural. There is also a skeptical view point being presented related to the undependable commitments made regarding "preserved open space" that have been established in the past and subsequently allowed to be developed in the County. The Miakka Community represented by this application believes that the RH/E RMA designation of the subject lands better serves the stated "Ideals" taken from the goals of the Directions for the Future County document that established the RMA organizing concepts and principles for the 2050 Plan policies.

RMA Policy 1.1 - Provide for a variety of land uses and lifestyles to support residents of diverse ages, incomes, and family sizes, including housing that is affordable to residents at or below the median income for Sarasota County.

Applicant Statement:

Rural Heritage/Estate designation on this property will meet goals. Rural Heritage/Estates provide for an agricultural/rural lifestyle. This is the only RMA that allows for a broad range of animals to be raised and slaughtered. Looking at the currently designated Rural Heritage/Estate area located on the west, south and east of the proposed change, you will find generations of families that have lived in this area.

The incomes are very diverse because of the age of the area as a community. Many of the residents are in the construction trade. This is the only land use that allows their vehicles and equipment to be stored. The retired residents' incomes vary as well. Rural residents are not afraid of the dark and do not need outdoor lighting. Rural Heritage/Estates allows for zoning of 1 per 160 acres, 1 per 10 acres and 1 per 5 acres.

The existing hamlet overlay does not provide for diversity. Housing starting in the \$300 thousands are not for low or even medium income families. If any animals can be raised, it will be on a very small scale. Deed restrictions are usually the norm. Urban/suburban people are afraid of the dark. Even with lighting restrictions, the potential for 400 houses each hamlet to light up the sky is a reality. Lakepark Estates has set the norm. 400 houses on 1 acre parcels. No diversity of land use.

Staff Comment:

The applicant makes a legitimate point that there is no variety of land use within the Hamlet form as demonstrated by the only Hamlet development approved by the County called Lakepark Estates. The form is more in keeping with that of a typical suburban subdivision with +/- 10,000 sq. ft. lots, and nothing inherently about the form indicates affordability or diversity. The existing ranchettes in the area are more organic in nature having developed very slowly over a long period of time, which has established some degree of diversity.

RMA Policy 1.1 - Preserve environmental systems

Applicant Statement:

The area for the proposed Comprehensive Map Plan change is improved, unimproved pasture and undeveloped partially grazed from at least 1971 to the current time. The environmental significance of this land is that it is located in the Myakka River Watershed and the Southern Coastal Watershed. The Myakka River is designated as Class I waters from Manatee County line to Border Road at river mile 20. The portions within the park are also designated as a wild and Scenic River and as an Outstanding Florida Water.

Most notable on the updated list are impairments to Howard Creek and Clay Gully which both enter the Upper Myakka Lake. Howard Creek runs through part of the proposed map change property. The houses in the hamlet will be supplied with 100s of thousands of reclaimed water for lawn irrigation (an urban practice, not a rural one) allowing this high nutrient rich water to make its way into the Myakka River and Howard Creek. The Southern Coastal watershed extends along the southwestern shore of Florida from the mouth of Tampa Bay to the mouth of Charlotte Harbor and includes portions of Manatee, Sarasota and Charlotte counties. Within this watershed are barrier islands and some of Florida's most productive estuaries, wetlands, coastal streams and canal systems.

"EPA Watershed Academy provides 8 tools of Watershed Protection in Developing Areas. Watershed based Zoning: ... involves defining existing watershed conditions, measuring current and potential future impervious cover, classifying sub water basin based on the amount of future imperviousness, and most importantly modifying master plans and zoning to shift the locations and density of future development to the appropriate sub water sheds management categories." The article goes on to say: "Large Lot Zoning: This land use planning technique is perhaps most widely used to mitigate the impacts of development. The technique involves zoning development at very low densities to disperse impervious cover over very large areas."

The proposed Comprehensive Plan RMA Map change to Rural Heritage/Estates (maximum homes 1,200) from Hamlets (2,400 houses) will better protect both watersheds. The use of reclaimed water (high in nutrients) will only runoff this land due to high water tables and go to the Myakka River or the Gulf. Both of these waterbodies are experience nutrient problems. To add to the problem would not be preserving environmental systems

An important management tool for environmental preservation is fire. Sarasota County and Myakka River State Park regularly burn to manage the vegetation. Sarasota has a community park at the end of Fruitville Road. When controlled burns occur, smoke and dust and ashes are blown throughout the area. Rural residents accept this as a management tool. City folks complain about the ashes in their pool (yes, the ashes come through the pool cage).

Staff Comment:

The applicant is presenting the straight forward point that "less is more" when it comes to preserving the environmental systems. The less intrusion into these important water sheds, the better off they will be. Reducing the number of DUs being introduced into the area will inherently reduce the impact on these environmental systems, and therefore be less impactful. Sometimes less intensive residential development is more beneficial for the preservation of the environmental systems.

RMA 1.1 - Direct population growth away from floodplains.

Applicant Statement:

Looking at Soil Survey of Sarasota County, Florida by the United States Department of Agriculture, soil Conservation Service the soils of the proposed Rural Heritage/Estates are Soils of Flatwoods.

"EAUGALLIE-MYAKKA-HOLLLLLLOPAW-PINEDA: Nearly level, poorly drained and very poorly drained soils that have a sandy surface layer and a sandy and loamy subsoil, are sandy throughout, or have a sandy surface layer and a loamy subsoil."

In the letter dated December 21 2018, from Sarasota County to Mr. Donald A. Neu, AICP, Neumorris, LLC, Re: Preapplication Conference Review by the Development Review Coordination Staff North Fruitville Hamlet Area, CPA No. 2018-C Benjamin Choroser II (Stormwater) noted this site is located in a local community flood hazard area (CFHA).

So while this area is not in a flood plain, EauGalle and Myakka soils have an apparent high water table of 0.5-1.5 feet June - October. Holopaw and Pineda soils have high water of +2-1.0 feet June - February and 0-1.0 feet June - February respectively.

Rural Heritage/Estate will allow the maximum of 1,200 homes on the 6000± acres of the proposed amendment. The homes will most likely dig a small pond to use for a house pad and for a water source for the animals. The lack of an impact from a small pond are clearly visible throughout the Rural Heritage/Estate RMA in the Old Miakka area. That is, there aren't any impacts that the county has identified. Hamlets would allow a maximum of 2,400 houses.

Lakepark Estates is a good example of the type of topographical destruction that will occur. There will be 400 houses and 600 acres of lakes. One house per acre next to another and another along with roads would cause the entire 400 acres to be raised. Since the water table is above land surface 6 to 8 months out of the year, you can't dig a stormwater pond that will hold the water because the land is saturated above land surface.

The County hasn't done any analysis on what happens to the sheet flow, vegetation changes and impacts, habitat destruction, rainfall patterns and impacts to wildlife due to changing land to stormwater ponds.

Staff Comment:

The subject area is not heavily impacted by floodplain. However, there is merit to the applications assertion that the seasonal water levels are an environmental consideration that should be taken into account. While the subject area is not within a regulated floodplain, the stormwater regulatory review will need to incorporate the areas unique characteristics into the evaluation of any form of development.

RMA 1.1 - Avoid Urban Sprawl.

Applicant Statement:

Rural Heritage/Estate by its very name is not urban sprawl. The Hamlet designation area that is the subject of this Comprehensive Plan Amendment is urban sprawl. This is the farthest east and north you can go in the County. The fact that they will need water to irrigate their yards is a CLEAR indication that this is an urban lifestyle. For 2,120 the reclaimed water flow in gallons per day (GPD) is 424,000. This is also the amount of sewer GPD.

Staff Comment:

The Hamlet form of development was incorporated within the 2050 Plan to facilitate development in a clustered form with a large amount of open space around it to assist with the mitigation of its impact. The question being raised by this application is the location of this form of development this far east in the County, and the extent of that form currently available to be pursued. A series of Hamlets having a total of 6000 acres with 2400 homes would be considered urban sprawl when looking at it with the typical concerns raised related to residential development sprawling eastward.

RMA 1.1 - Reduce automobile trips.

Applicant Statement:

The proposed comprehensive Plan Amendment to change the land north of Fruitville Road and west of Verna to Rural Heritage/ Estates would reduce automobile trips to 3,000 (1,200 homes) rather than the 6,000 (2,400 houses) to be generated by the Hamlet overlay. Trips were determined by giving 2.5 persons per household and letting each 2.5 persons have a car.

While focusing on the automobile trips, the real traffic from the development must include the trips generated by the construction traffic. In the "DRAFT of Phase I of the Fruitville Hamlet Benefit Area (June 19, 2017), with an estimate of 2,120 Dwelling Units, planning horizon of 20 years, (absorption rate of 106 homes per year on average)" the construction traffic would also last for 20 years.

Here is a list, not all inclusive, of the traffic generated to build a house and road:

1. Surveyors
2. Site prep dumb trucks (plural) with back up beepers
3. Earth moving equipment with back up beepers
4. Grading equipment with back up beepers
5. Crew for concrete forms (several cars)
6. Concrete trucks (plural) with back up beepers
7. Crews to work concrete (several cars)
8. Road paving heavy equipment with back up beepers
9. Road paving crew (several cars)
10. Concrete block delivery with back up beepers
11. Wood delivery with back up beepers
12. Framing crew (several cars)
13. Concrete block setters (several cars)
14. Roofing delivery with back up beepers
15. Roofers (several cars)
16. Electrician with helper (two cars potential) rough in
17. Plumber with helper (two cars potential) rough in
18. Drywall delivery with back up beepers
19. Drywall crew (2 car minimum)
20. County inspectors (several visits)
21. Lunch Wagon daily
22. Painters (2 car minimum)
23. Window delivery truck with back up beepers
24. Window installers (2 car minimum)
25. Cabinet delivery with back up beepers
26. Cabinet installation crew (minimum of 2)
27. Floor covering crew (minimum of 2)

28. General contractor visits (several)
29. Door delivery with back up beepers
30. Door installation crew (minimum of 2)
31. Irrigation crew (minimum of 2)
32. Landscape crew (minimum of 2)
33. AC person (minimum of 2)
34. Sod delivery with back up beeper
35. Punch out list could have several installers called back

By the County's own analysis, this traffic would plague the residents and their livestock of the Rural Heritage/Estates for twenty years. It would disrupt the quiet of the rural area making it akin to living next to Home Depot or Lowes. Couple this with the fact that most traffic, large and small, exceed the speed limit of 55 mph on an hourly basis.

The FINAL SUMMARY REPORT YEAR 2020 FINANCIALLY FEASIBLE TRANSPORTATION PLAN prepared for: Florida Department of Transportation and the Sarasota/Manatee Metropolitan Planning Organization does not show any road improvements on Fruitville Road or Verna Road. The traffic is already a continuous parade in a rural area. The proposed Comprehensive Plan Map change will reduce the amount of traffic.

Staff Comment:

The basic fact is that more DUs will bring more traffic, this is an undisputable fact. It is also true that construction traffic will be involved with any form of development. These facts do not negate traffic analysis of the impacts from whatever form of development that may occur.

RMA 1.1 - Create efficiency in planning and provision of infrastructure.

Applicant Statement:

In 1971, Sarasota County commissioned Consulting engineers Smally, Welford & Nalven and Russell & Axon to prepare a WATER AND WASTEWATER SYSTEMS MASTER PLAN. This is a true regional plan to serve the needs of Sarasota County for the next 40 year, through 2010. (Letter dated June 15, 1971 to Board of County Commissioners from Donald J. Smalley P.E. and Frank T. Osteen, Jr. P.E) Individual well-water and individual septic tank system could provide adequate solutions for a rural homestead (Section II, B. Purpose of Report).

As stated earlier, 424,000 Gallons of flow Per Day of Reclaimed Water are expected to be generated. Currently, Sarasota County does not have the capacity to contain all their reclaimed water in an environmentally safe way. The County is dumping their reclaimed water at the Bee ridge Plant into Cow Pen Slough (although the person writing the report spells slough slew). State Warning Point <https://floridadep.gov/pollutionnotice> shows that 218+ gallons per day were discharged to Cow Pen Slough and Philippi Creek since December 2018. The County cannot handle what is being generated currently. Adding 424,000 million more gallons per day is not efficiency in planning.

Appendix B TECHNICAL MEMORANDUM ON SEPTIC TANK LITERATURE REVIEW AND ANALYSIS, MEMORANDUM TO: Mike Heyl, CDM/ Sarasota FROM: Rich Wagner, CDM/ Annadale SUBJECT: Literature Review of Septic Tank Loadings, DATE: January 27, 1992, TABLE 1, FLOW RATES FOR SEPTIC TANK EFFLUENT shows a Flow Rate (gal/capita/day) of between 38 -80 gallons. Using a maximum build out of 1,200 homes under the densest Rural Heritage/Estate the rate would be 288,000 gallons per day which would be dispersed over the 6,000+ acres in 5-acre increments. This is certainly more efficient than shipping waste water from the furthest eastern and northern reaches of the County.

Sarasota County has never proven that septic systems in the Rural Heritage/Estates located in Old Miakka are polluting. Individuals pay for their own septic tank, maintenance and repair. The proposed change to Rural Heritage/Estate will eliminate the County's responsibility and associated costs to provide drinking water since each home will provide their own water by individual wells.

Previously, using the County's TDR program, development rights could be sold to help offset the infrastructure costs. With the change in the TDR program, there will not be that money available.

Staff Comment:

The applicant presents a valid point related to the use of septic systems being employed to deal with sanitary sewage rather than a centralized system. The greater number of DUs allowed leads to a self-fulfilling argument for a centralized system. The question of whether the subject area is better served by a dispersed system (septic fields) or a centralized system should be analyzed from both perspectives.

RMA 1.1 - Conserve water and energy.

Applicant Statement:

Homes in the Rural Heritage/Estates supply their own drinking water, outdoor water use and animal husbandry needs from one ground water well. Typically, subdivisions in the adjoining area (Rainbow Ranches, Oakford and Ranches at Bern Creek) typically have one well per parcel. There were only two parcels with 2 wells. "The overwhelming numbers of homeowners in these developments are able to meet both their potable and irrigation needs through one well." "Per capita use for domestic self-supply water wells is 58 gallons per day per person". "Per capita use for public supply service population and water use, 2000 is 90 gallons per day per person."

The proposed Comprehensive Plan Map Amendment would reduce the amount of water consumption. The Rural Heritage/Estates would produce 1,200 homes with a daily use of 124 gallons per day and the Hamlet overlay would produce 2,400 houses with a daily demand of 215 gallons per day. That is 148,800 gallons per day self-supplied compared to 516,000 public supply. This is using the above public per capita amount. Sarasota County estimated 530,000 gallons per day for 2,120 houses in the Fruitville hamlet Benefit Area. 17

Staff Comment:

This once again makes the case for "less is more" in that if the desire of the County is to encourage development that is less impactful on water and energy consumption, then the Rural Heritage/Estate RMA appears to be the more appropriate choice based on the basic facts presented. Ranchettes with individual water supplies do not experience loss within distributions systems, and do not incur costs associated with those systems. This includes the energy costs from operating those systems.

RMA 1.1 - Preserve rural character, including opportunities for agriculture.

Applicant Statement:

Attached are the comments from two public meetings on rural character (the pluses of 5/10 /160-acre home sites versus the minuses for hamlets /urban sprawl.

Staff Comment:

The Hamlet form does allow for agriculture uses to take place on the 60% of open space required within them. The general question that has been raised in this application is whether agricultural uses can be compatible with the "suburban" form of development that is the Hamlet residential. The applicant presents the case for the Rural Heritage/Estate RMA designation being the more appropriate form that would allow for actual agricultural uses without impacting "suburban" residential.

RMA 1.1 - Balance jobs with housing.

Applicant Statement:

As pointed out previously, many people involved in the construction industry live in the Rural Heritage/Estates RMA designated areas. This map use change would allow for more housing opportunities for this work force.

Staff Comment:

There is no inherent difference between the Hamlet form of development and the Rural Heritage/Estate form of development as related to balancing jobs with housing, other than the more housing units that are built the more labor required. It is true that with the ranchette form of development, construction trade workers generally can store their equipment on-site without negatively impacting their neighbors.

Planning Section Two – Application response to foundational concerns with applications for a CPA.

The first question to answer within an application for a CPA to make a change to the 2050 Plan is:

1. Has anything changed related to the underpinning conditions to which the 2050 Plan was responding when it was developed?

The applicant has stated in meetings with staff in preparation for the filing of this application that among their group's various reasons for filing this CPA is that it is in response to an application for CPA-2018-C filed by agent Don Neu of NeuMorris LLC on behalf of the North Fruitville Hamlet Utility Group (NFHUG).

That application (CPA 2018-C) is requesting to triple the density incentive for the Hamlet Land Use form by doubling density allowed within the Hamlet Land Use Developed Area for those lands so designated on the V/OS RMA. The only discernable reason extracted from that application for the need to adjust 2050 Plan policy is that the demand for Transfer of Development Rights (TDRs) within the Village Land Use designated areas has been dramatically reduced. This is claimed to be due to the low residential density being approved within the Village Land Use designated areas by the County, and the outright granting of residential density to a major portion of the South Village Area (south of Clark Road) by the County.

The assertion by that application (CPA 2018-C) is that this reduced demand for TDRs has a significant impact on the Hamlet Land Use designated areas. The logic presented suggests that the Hamlet Land Use designated areas potentially would have been the source of those TDRs for the Village Land Uses, and this would have facilitated the Hamlet Land Use areas being able to financially subsidize the extension of utilities for certain Hamlet development. This is apparently why the only qualifier being suggested within the application for CPA-2018-C is that said Hamlet areas must enter into a utility extension agreement with the County for sanitary sewer and potable water supply, although this is not incorporated within that proposed CPA in any way.

There is no disputing the fact that the Village Land Use designated areas zoned to date have been at a lower density level than originally anticipated by the 2050 Plan. Additionally, a major portion of the South Village Area was in fact granted residential density without the need for purchasing TDRs at all. These actions by the County have reduced the demand for TDRs. Therefore, there is less demand for the excess TDRs that may have been produced from designated Hamlet Land Use areas.

This application CPA 2019-C relies on this fact of reduced demand for TDRs as the basis for their assertion that the Hamlet Land Use designation on the subject +/- 6000 acres is no longer needed for the 2050 Plan to function. The applicant is presenting the argument that the subject +/- 6000 acres should be re-designated as RH/E RMA to more closely match the existing Miakka Community area land

use pattern. This is a coherent argument for this narrowly defined application for CPA 2019-C, especially in light of the fact that certain property owners of interest within the subject area have presented this argument within their application CPA 2018-C.

Staff's initial comments on this application's content focuses on the following topics:

- A. 2050 Plan fundamentals related to the Hamlet Land Use form;
- B. Projected need for housing units on which the 2050 Plan is based; and
- C. Potential scope of this requested change.

A. 2050 Plan fundamentals related to the Hamlet Land Use form:

This requested change must be looked at within the context of what the 2050 Plan was essentially designed to accomplish. The 2050 Plan was established as a vehicle for planning the continued development of Sarasota County out to the year 2050. It set forth an urban corridor (Village Land Use designated area) along the east side of Interstate 75 to facilitate a major portion of the County's projected growth, which was held to be essential for the County's future.

This urban corridor was east of the Urban Service Boundary Area (USBA) line established by the Comprehensive Plan. The USBA applied limits on growth east of that line based on residential capacity needs. The urban corridor of the 2050 Plan set up parameters under which development would be allowed to occur east of the USBA line.

The 2050 Plan also established a Countryside Line that limited the urban corridor (Village Land Use designated lands) to those lands west of it, creating a demarcation line east of which the County would maintain a rural land use character [VOS Policy 2.1(c)]. Primarily, the residential density and intensity of development within the urban corridor was to be derived by removing it from environmentally sensitive lands and other lands potentially being developed east of the Countryside Line. The Hamlet Land Use designated area of the Village/Open Space RMA is the primary form of development identified within the 2050 Plan for those lands east of the Countryside Line.

A major element of the 2050 Plan's Transfer of Development Rights (TDR) program was to facilitate the shifting of density and intensity from those lands east of the Countryside Line to those lands west of that line. There was a built-in enticement that provided the Hamlet form of development with the option to develop at a maximum of 0.4 DUs/acre. This enticement already represents a doubling of the allowed density and intensity existing on said lands because the existing FLUM designation for these same lands still limits them to 0.2 DUs/acre.

B. Projected need for housing units on which the 2050 Plan is based:

The County based the 2050 Plan on the University of Florida Bureau of Economic and Business Research (BEBR) medium population projections for the years 2000 to 2030. These figures were converted to housing units and extrapolated out to the year 2050. Those BEBR projections indicated that the number of housing units within unincorporated Sarasota County were 126,006 in the year 2000 and would be 143,399 by 2010. The U.S. Census figures coincide with the BEBR based housing units for the year 2000 and indicate that there were actually 146,554 housing units in 2010 within unincorporated Sarasota County. This is a clear indication that the County is not off course when it comes to the number of housing units being made available having 3000 more housing units than projected for 2010. The 2020 U.S. Census will afford the County with another accurate check point.

Additionally, pursuant to FLU Policy 3.1.3 the County is to monitor the Residential Housing Capacity with each Comprehensive Plan Evaluation and Appraisal Report (EAR) conducted on a 7-year interval. It is to inform the evaluation and appraisal process for updating the Comprehensive Plan. The most up to date analysis is the County's 2014 Residential Capacity Analysis which indicated that there was a 259% potential capacity for the following 10-year demand period. The next EAR cycle is due to be initiated in 2020 and the residential capacity analysis will be a part of that effort to provide monitoring of dwelling unit availability.

Using past practice as a guide and doing a basic accounting for those 2050 residential projects that have been approved subsequent to the 2014 Residential Capacity Analysis indicates that the residential capacity would not fall to a level that would be considered impactful. An impactful level would be when the residential capacity drops to a level that is no longer sufficient to accommodate projected future housing demand. While a full residential capacity analysis would be needed to determine a more up to date residential capacity percentage level, the basic accounting described above indicates that it would remain above the level considered to be impactful on the housing market.

Should this CPA 2019-C change be granted, there would be a 1200 DU reduction in residential capacity $[(6000 \text{ acres} \times 0.4) - (6000 \text{ acres} \times 0.2)]$ due to this area being designated Rural (1DU/5 acres) on the FLUM. Effectively, there is no deleterious drop in residential capacity as examined against the County's 2014 Residential Capacity Analysis, which had indicated a 259% potential capacity for the 10-year demand (most up to date analysis done by the County). The potential reduction in residential capacity does not rise to the level of being significantly impactful on the 2050 Plan.

C. Potential scope of this requested change:

This application CPA 2019-C is specifically applicable to +/- 6000 acres northwest of Fruitville Road and Verna Road. The change in designation requested would result in the potential reduction of 1200 DUs in residential capacity under the optional 2050 Plan. This would also reduce the potential source for TDRs under the optional 2050 Plan.

The reduction in TDR demand is a change to the underpinning conditions on which the 2050 Plan was based. This is due to the fact that with a reduced demand for TDRs comes the straightforward connection to the mechanisms that were established to potentially create those TDRs. If there is less of a demand needed for TDRs in order for the 2050 Plan to function, then there does not appear to be a critical need for the mechanism to create as many of them.

Therefore, the answer to this basic question as related to the application for CPA-2019-C is that this is a change related to the underpinning conditions to which the 2050 Plan was responding when it was developed.

A secondary question to answer is:

2. If there has been a change to the underpinning conditions for the 2050 Plan that would indicate a need for less housing units, should the potential for additional housing units be removed from the subject area?

The subject area consisting of +/- 6000 acres designated Hamlet Land Use on "Map 8-3 RMA-3: Village/Open Space RMA Land Use Map from Sarasota 2050 Plan" are the most easterly lands within the County designated as such. The fact that these lands are also not developable in the form of Hamlet Land Use without the financial assistance afforded through a utility extension agreement with the

County is a further indication that these subject +/- 6000 acres are a likely candidate for reducing the ability to produce TDRs. The need for a utility extension agreement in order to develop the Hamlet form on the subject lands also raises questions related to a main principle of the 2050 Plan that development be fiscally neutral to the County and its residents.

ENVIRONMENT PROTECTION (Bryan Beard) 915-7717, bbeard@scgov.net

Scope of work will need to include an analysis of how the proposed change will affect the Greenway RMA. Hamlets are large land use applications that require the ground truthing of Greenways and their protections during the review and adoption process. The proposed change of converting Hamlet designations to Rural Heritage needs to be reviewed to ensure that no loss of the Greenway functions and wildlife linkages would be a result of an unintended consequence of this proposed change.

Please feel free to meet with me or other staff to discuss our comments. If you have any questions regarding this letter, call me at (941) 861-5107.

Sincerely,

Wm. K. Spaeth

William K. Spaeth, Planner
941-851-5207