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July 27, 2022

Sarasota Board of County Commissioners
1660 Ringling Blvd.
Sarasota, FL 34236

Via electronic mail

Re: Sarasota County Village Transition Zone/Comprehensive Plan Amendment 2022-B

Dear Commissioners:

1000 Friends of Florida is a nonprofit growth management organization that has worked extensively to promote smart planning for communities and discourage urban sprawl throughout Florida, including in Sarasota County. Our commitment to these goals compels us to declare and explain our opposition to the Village Transition Zone comprehensive plan amendment now pending before you.

This amendment is precisely the type of significant land use change that Sarasota's existing comprehensive plan was meant to prevent. The property to which this CPA would apply consists of 4,120 acres of agricultural and vacant land with a handful of low-density residential uses that are appropriate and reflective of the rural community of Old Miakka. The future land use designation on the Sarasota County FLUM for this property is Rural. The applicant is unable to plausibly squeeze its desired land use densities into any of the existing land use categories that Sarasota County planning staff, elected officials and the public have created as part of the vision for smart growth in the county. So instead, the applicant seeks to create an entirely new land use category to best suit private financial expectations.

The new land use category would be "Village Transition Zone/Greenway RMA Overlay." A more appropriate label would be to simply call this type of land use what it is: sprawl. The property is outside both the current and future Urban Service Boundaries and would require the extension of new wastewater service lines, potable water, roads and other public facilities. These are all primary indicators of sprawl. These proposed changes run counter to our mission to promote smart growth and discourage sprawl.

To understand the extent of the density being sought, a comparison of what is currently allowable with what is being applied for is warranted. Existing zoning for the 4,120 acres would allow only 717 dwelling units. If rezoned to the existing land use category of Hamlet, it would allow a maximum of 1,600 dwelling units. The new sprawl land use category that is being sought by this developer-initiated CPA would allow a residential density of two dwelling units per gross developable acre, resulting in a total of 8,000 dwelling units — 5,000 as the capped density with 3,000 units available for the transfer of development rights.

The amendment would cause suburban sprawl, increase traffic congestion and would violate the intent of the transitional density zones already contemplated by the establishment of Hamlets in the area that lies around the historic agricultural community of Miakka. Continuing to create "transition" zones between

rural and suburban land uses would obviate the need for any transition at all if the entire land mass is sprawling development.

One of the primary tenets to good land use planning is transparency and robust public engagement. This principle is codified in Policy 1.3.4 of the Sarasota County Comprehensive Plan, which states that the purpose of the workshop shall be for the applicant and community to work collaboratively and discuss the nature of the proposed development, to solicit suggestions and concerns. The workshop for this CPA only involved one 15-minute neighborhood workshop hosted in a remote location. This hardly meets the intention of the Policy.

The amendment also violates Policy VOS 2.9 of the Sarasota County Comprehensive Plan requiring that each Village development “shall provide adequate infrastructure that meets or exceeds the level of service standard adopted by the County and be Fiscally Neutral or Fiscally Beneficial.” Certainly a transitional zone emanating from a Village development must likewise demonstrate that it is fiscally neutral or fiscally beneficial. Sarasota County requires that the total proportionate share cost of infrastructure be included, not simply the existing impact fee rates but all expenses for the expansion of public facilities. This is because impact fees have proved over time to produce inadequate revenue to pay for all the required expenses associated with new public facilities. This developer-initiated comprehensive plan amendment fails to provide this requisite data and analysis and as such, must not be adopted.

As a result of the sprawl and economic impact this proposed comprehensive plan amendment would have on the residents and taxpayers of Sarasota County, not to mention the legacy of forever altering the agricultural community of Miakka, 1000 Friends of Florida respectfully requests that you reject this amendment as currently proposed. Please feel free to contact us if you have any questions. Thank you.

Sincerely,



Jane West
Policy and Planning Director

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