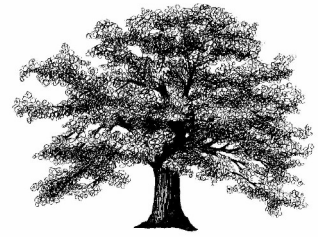


## **Bern Creek Improvement Association**

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941-444-7090



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July 31, 2022

Sarasota County Planning Commissioners

Donna Carter  
Justin Taylor  
Neil Rainford  
T. Andrew Stultz  
Kevin Cooper  
Colin Pember  
Teresa Mast  
Michelle Ryan

RE: Opposition to CPA-2022-B

Dear Commissioner,

Bern Creek Ranches Homeowners' Association is writing to express great concern and strong opposition to the Lakewood Ranch Southeast proposed Comprehensive Plan Amendments. The Bern Creek Board is very concerned about the negative impacts this proposed development will have on our community. This proposed development will surround the long-established rural community of Bern Creek Ranches by development with densities of 10- to 20-times greater than that of the homesteads in Bern Creek and densities of 10- to 20-times greater than the underlying established zoning for most of the land in the proposed development. The 400 dwelling units in the Lakepark Estates hamlet, previously approved by the County and which adjoins Bern Creek along its south and east boundaries, is already a significant density increase in development in this area. Lakepark Estates will now be merged with the proposed Lakewood Ranch Southeast and have even greater density than previously approved.

Bern Creek homeowners as well as other 5- and 10-acre homesteads in the immediate vicinity will suffer significant negative impacts to our quality of life, safety on the roadways, increased flooding, noise and light pollution, loss of habitat and increased danger for existing wildlife, and many other assaults on the rural life we have sought and enjoyed. Many of us purchased our properties prior to adoption of the 2050 Plan when the zoning was one house per 5, 10 or 160 acres. We understood that some changes would occur with the 2050 Plan; but we were also promised that our rural lifestyle would be preserved and respected. In the 2050 Plan, Hamlets were the buffer and transition from the higher density and mix of land uses in Villages, to the rural areas (5 and 10 acre homes sites) and rural roadway character and viewshed was preserved. The proposed Village Transition Zone provides even less transition than hamlets!

The proposed VTZ RMA has higher density, reduced open space, and reduced greenway and buffer requirements compared to Hamlet development.

The bottom line is the Lakewood Ranch Southeast proposal basically guts the 2050 Plan. The County spent years and untold public funds developing the 2050 Plan by hiring experts and consultants, getting the community involved with many workshops, and doing a thorough study of future development in Sarasota County. In contrast, now a single developer will completely change the framework and foundation of the 2050 Plan in just a few short months, without proper community input, and without thorough analysis of the impact of these changes on the entire County!

There are many reasons to deny CPA 2022-B but some of the most compelling reasons include:

- Existing zoning allows only 717 homes. If the full subject property is rezoned to "Hamlet" it would allow a maximum of 1,600 dwelling units. CPA 2022-B will allow construction of 5,000 dwelling units, with additional dwelling unit rights to be sold or transferred. This is completely incompatible with the rural character of lands adjacent to the subject property, including Bern Creek and nearby rural neighborhoods as well as agricultural lands.
- The development allowed under CPA 2022-B will overwhelm a roadway system that is already under pressure. The 5,000 single family dwelling units will generate an **additional 47,150 average daily vehicle trips** on roads for which there are no existing, adequate funding sources to address this impact (using 9.43 trips/day/sfdu, ITE Trip Generation Manual per County Transportation Planning on July 15, 2022). This situation will result in impairment of the only existing evacuation route for eastern Sarasota County, reduced safety from increased accidents, and reduced public health and safety from increased travel times for emergency services. Even using a reduced trip generation number of 7.98/day/sfdu (which County staff uses without any foundation or reference other than CPA 2018-C, a hamlet development intended to have some internal trip capture unlike the proposed VTZ), the proposed development would generate **39,900 additional daily trips**.
- CPA 2022-B is incompatible with a number of policies in the County Comprehensive Plan and Florida Statutes including, but certainly not limited to, the following: 1) FLU Policies 2.2.1 and 2.2.2 (protect and maintain agricultural lands and limit residential development in the Rural Area), 2) FLU Objectives 2.2 and 5 (to maintain governing regulations and protect existing rural character of areas outside of the USB through the design standards of new Village and Hamlet development), and 3) FS §§163.3161(11), 163.3162(1) that recognize agricultural lands are unique and irreplaceable resources of statewide importance and are to be protected. CPA 2022-B clearly is not just inconsistent with these policies but is in opposition to them.
- CPA 2022-B will result in urban sprawl in violation of FS §163.3177(6)(a)(9) by destroying 4,120 acres of agricultural and undeveloped rural lands with a suburban land use that is isolated from the USB and other urban development, by resulting in inefficient and costly use of existing and future public facilities and services, and by failing to provide a clear separation between rural and urban uses.

- The proposed amendment and its novel Village Transition Zone RMA completely fails to promote or adhere to the Comprehensive Plan's policy framework of the Resource Management Area (RMA) system of encouraging a compact development form. Comprehensive Plan, V1-297. In fact, VTZ development is exactly the type of development the 2050 Plan was designed to prevent – urban sprawl.
- CPA 2022-B violates and is inconsistent with ENV Objective 1.2 of the County Comprehensive Plan, which is to protect environmental resources during land use changes and establishment of urban services. The application reflects a significant reduction in open space preservation from 80% for OUE-1 and OUR, 60% for Hamlet RMA down to the initially proposed 50% and down more to the currently proposed 43%. This results in a net loss of 576 acres of open space compared to requirements under existing zoning. The application also proposes to greatly undermine the environmental value of open space by allowing such land to include stormwater facilities, utility facilities, park facilities, telecommunications towers, and other public facilities. This is certainly not consistent with the Sarasota 2050 Resource Management Area Core Principle that open space should implement an inter-connected system that conserves natural habitats and preserves agricultural/ranch lands. In addition the significant reduction in open space and buffers (for example, no buffer on eastern boundary, buffer adjacent to Fruitville Road reduced from 500-feet to 50-feet) will not provide adequate habitat for protection of wildlife and ecological communities.

The Lakewood Ranch Southeast proposal in CPA 2022-B will not protect our rural area and homes but will instead endanger the peaceful enjoyment of our properties, impair our health and safety, and damage our quality of life and properties.

**We respectfully request that you Vote NO on CPA-2022-B.**

Sincerely,  
Bern Creek HOA Board  
By its President,

Michael Hutchinson



Vice President - Michael Resnick  
Treasurer-Secretary – Frank Rich  
Board member – Cindy Martin  
Board member – Kenny Castro  
Board member – Gary Dahl  
Board member – Tommy Gregory

cc: Brett A. Harrington, Planner of the Day