

To: Sarasota County Planning and Development Services
From: Katie LaBarr, AICP
Stantec
Project/File: 215616736 Lakewood Ranch Southeast
Date: June 3, 2022
Application No.: 22-01

Reference: Sufficiency Review - Response to Comments

We are in receipt of the Sufficiency Review – Staff Comments. Please find our responses to comments below sectioned by discipline and written **in bold**.

LONG-RANGE PLANNING

After initial sufficiency review by Sarasota County Planning staff, the initial submittal has been found to be *Insufficient*. Please address the following concerns:

1. Question 10b and c on the Application. Applicant needs to clarify whether the line extension(s) noted are shown in either the County or Peace River Water Supply Authorities Capital Improvements Budget.

Response: Please see updated Section 1.1 of the application package. A potable extension and booster pump stations, which are listed in the County's Capital Improvement Program (CIP), are currently being installed near the project. A potable line from this project, which will need to be extended throughout the subject property, is not identified in the County's CIP. An additional extension is identified regarding a supply line per the Peace River Manasota Regional Water Supply Authority's CIP.

2. Please revise the amendment to RMA Goal I by making the fonts consistent with what is in the adopted Comprehensive Plan, and by cleaning up the final paragraph to avoid large spaces between words.

Response: Please see updated Section 3.1 of the application package, the proposed text amendment language formatting has been updated to reflect the requested edits.

3. In proposed VTZ Policy 2.5 the language states: "*... should development incentives (i.e. Incentivized Community Housing) yield more units than development can support, any undeveloped units (up to, and in excess of the Maximum VTZ Density) may be transferred from the VTZ to another project, in accordance with TDR obj 1. VTZ obj 1.*"

Staff has concerns with the phrase "*may be transferred from the VTZ to another project.*"

Please define what is meant by the term "*another project*." Does this mean another approved LWR Ranch project in Sarasota County? What if other projects are already capped for the number of residences? Does this imply that the additional units could be used for projects in LWR in Manatee County? As written, the proposed policy is vague and unclear.

Response: Please see updated Section 3 of the application package. VTZ Policy 2.5 has been updated to state *"In order to promote Community Housing and integration of a variety of housing options, upon development, should development incentives (i.e. Incentivized Community Housing) yield more units than development can support, any undeveloped units (up to, and in excess of the Maximum VTZ Density) may be sold or otherwise transferred from the VTZ by the Master Developer pursuant to TDR obj 1 contained elsewhere in this Chapter 8."*

The intent of this Policy is to enable SMR, the Master Developer, to sell additional units beyond the 5,000 maximum that could be developed at Lakewood Ranch Southeast, to another developer utilizing the TDR procedures that exist in Policy today. Such a sale could not take place without the recipient project being able to demonstrate fiscal neutrality and otherwise conform to the other Policy requirements (particularly density and form in the governing RMA/zoning district). The ability to use this incentive within the VTZ is essential in furthering the County's intent to encourage affordable housing beyond the bare minimums necessary to achieve the 5,000 maximum dwelling units.

Please note that all of the updates made to the proposed Text Amendment language are displayed in red for ease of reference for the reviewer.

4. Proposed VTZ Policy 4.4 addresses Fiscal Neutrality and Fiscal Neutrality Plans. Staff has concerns regarding level of review required by County staff in the process and, importantly, would like the VTZ to be tied directly to the Stewardship District. Staff has worked with the Applicant and is recommending the following changes to this proposed policy:

VTZ Policy 4.4 Fiscal Neutrality

Development within the VTZ shall provide adequate infrastructure that meets or exceeds the levels of service standards adopted by the County and be Fiscally Neutral ~~or fiscally beneficial to~~ Sarasota County Government, the School Board, and residents outside that development. The intent of Fiscal Neutrality is that the costs of additional local government services and infrastructure that are built or provided for the VTZ shall be funded by properties within the VTZ.

A Fiscal Neutrality Analysis, completed for ~~Stewardship District~~ lands within the VTZ, shall be demonstrated and deemed complete with the approval of the MDO. The MDO shall require that Fiscal Neutrality be determined for the entirety of the VTZ. In addition, the MDO may allow for incentives to provide affordable housing. For off-site impacts, the MDO will address the costs of infrastructure needed for the development. This shall include, but not be limited to, both

localized and Countywide impacts on County, City, State, and Federal transportation facilities (such as roads, intersections, sidewalks, lighting, medians, etc.). Such transportation related components shall be analyzed as a separate item from the remaining items of: public transit, schools, water supply and delivery, sewage transmission and treatment, solid waste, storm and surface water management, law enforcement, fire and emergency management, justice, general government, libraries, parks and recreation, and public hospitals. Fiscal Neutrality for funds that are not fungible (i.e, generally enterprise funds) shall be measured separately. Nothing within this Policy is intended to establish a school concurrency system.

The BOCC shall require that these procedures for measuring Fiscal Neutrality and the Fiscal Neutrality plans be submitted as part of the application for the MDO and reviewed for compliance by County staff. Fiscal Neutrality procedures and calculations for school demands shall be submitted to the School Board for review prior to review by the BOCC. All calculations of costs shall be based on current cost data.

The Fiscal Neutrality provisions applicable to the VTZ are expressly determined to be overarching to achieving the public benefits of the Sarasota 2050 RMA-1 Comprehensive Plan Amendments.

Response: Please see updated Section 3.1 of the application package. The “or fiscally beneficial” has been removed from VTZ Policy 4.4 as recommended by Staff. The addition of “Stewardship District” has not been added to VTZ Policy 4.4 but instead please see the proposed introductory language for the VTZ RMA, with the following language added in:

“The purpose of this VTZ RMA is specifically intended to support the expansion and extension of an existing community, not the creation of a separate new community or development. Utilization of the VTZ RMA should be limited to specific lands that meet the following criteria:

- The VTZ RMA is intended for use only to support the extension of an existing community, as opposed to the creation of a new and separate community which happens to be adjacent to a planned or existing Village. Other RMA’s should be utilized to create a new community as opposed to extend an existing community.***
- The VTZ RMA is only to be used in instances where it can be demonstrated that a Master Developer will commit to long-range planning and oversight of the project through implementation and buildout.***
- Finally, the VTZ RMA is only intended for use where there is an existing financing mechanism in the form of a stewardship district or community development district capable of making a financial commitment sufficient to construct and maintain the infrastructure necessary to support the development in question. All of the land proposed to be within the VTZ boundary must be within the boundary of such a district.”***

In addition, the Applicant has also made updates to the 2050 RMA Chapter introduction, VTZ obj 1, and VTZ Policy 1.1 language to further clarify that the VTZ shall only be applied on the 4,120± property

identified on Map 8-5 RMA-5: VTZ Land Use Map and shall not be applied elsewhere.

5. For the Neighborhood Workshop Report, please add the following names of Sarasota County PDS staff that attended this meeting:

Brett Harrington, AICP, Planner III - Planning and Development Services

Ana Messina, Planner I – Planning and Development Services

Response: The summary of the Neighborhood Workshop has been updated to include the above names of Sarasota County PDS staff that attended the Neighborhood Workshop meeting. Please see updated Section 4.6 of the application package.

6. Mapping: Upon review of the proposed Comprehensive Plan mapping amendments staff has identified some internal map numbering issues and additional items that can and need to be addressed with this amendment as follows:

(a) Proposed Map 8-5: RMA-1, Resource Management Areas actually should be labeled as Map 8-1.

(b) 2050 Map 8-3 should be amended to indicate the proposed location of the new Village Transition Area.

(c) Please amend Future Land Use Policy 1.1.2 to include Map 8-5, VTZ Land Use Map as part of the Map Series.

Response: Proposed Map 8-5 RMA-1: Resource Management Areas has been updated to be labeled as Map 8-1, please see updated Section 3.2 of this Application Package. The 2050 Map 8-3 has been amended to indicate the proposed location of the new Village Transition Area, please see updated Section 3.2 of this Application Package. Additionally, FLU Policy 1.1.2 has been added into the proposed Text Amendment language and shown as amended to include “Map 8-5 RMA-5: Village Transition Zone Land Use Map” as a part of the Map Series, please see updated Section 3.1 of the application package.

TRANSPORTATION

Application is *Insufficient*.

1. The proposed development will generate more than 100 PM Peak Hour trips. As such a transportation impact analysis shall be submitted with the application. Per Resolution No. 2019 - 106, transportation impact analysis shall be conducted in accordance with an approved methodology. The submitted methodology for the required transportation impact analysis has not been approved. The submitted analysis is incomplete as submitted.

Response: A methodology statement was submitted on April 14, 2022. Comments were received on May

16, 2022, and a revised methodology statement was resubmitted on May 27, 2022 which incorporated the comments received. The transportation impact analysis has also been revised to incorporate the methodology comments. Please see Section 5 of the application package for the updated transportation methodology and analysis.

RESOURCE PROTECTION

Application is Insufficient.

1. The narrative for the proposed Comprehensive Plan amendment contains the following statement:

"The Applicant is requesting a concurrent Comprehensive Plan Large-Scale Map Amendment to reflect the VTZ RMA and Greenway RMA for the subject property and to amend the Countryside Line to shift it to the east side of the subject property (See Section 3 of this application package)."

If the amendment is looking to accurately identify the Greenway on the property it will need to provide the site-by-site analysis required by Chapter 124, Article 14, Section 124-271 (i)(2)(b) for review. This may also need to be followed up with a site verification meeting with EPD staff. The information on the Greenway RMA map located in the Comprehensive Plan is approximate. The site-by-site analysis is required at the Master Land Use Plan (aka MDO) but there is not a provision that restricts it to not being done sooner. If the accurate identification of the Greenway RMA on the project site is not being sought, then please update the narrative accordingly to reflect it being done at the Master Land Use Plan stage.

Response: Please see updated Section 2 of the application package. The narrative has been updated to state "Please note as a part of the Large-Scale Map Amendment, the Greenway RMA will be reflected as it currently is reflected in the Comprehensive Plan".

The requirements, regulations, and processes in Chapter 124, Article 14, Section 124-271 of the UDC are not applicable to the VTZ RMA as they are specific to Village, Hamlet, and Settlement Area Regulations. The intent of the VTZ RMA is to not utilize Chapter 124, Article 14, Section 124-271 of the UDC during its implementation but instead utilize the regulations within the proposed Comprehensive Plan Text Amendments, the RSF-2/PUD standards, and the Master Development Order (MDO).

2. Please confirm that no addition uses are being proposed for Greenway RMA than what is currently contemplated by the Comprehensive Plan and allowable by the UDC. The application lumps Greenway into Open Space and prescribes uses that are not permissible under current 2050 regulations. Staff is looking for confirmation that these proposed uses will not be applied to Greenway RMA areas identified within the VTZ RMA boundaries.

Response: Please see updated Section 3.1 of the application package. VTZ Policy 3.1 has been updated to clarify that *“Lands designated as Greenway RMA shall count towards the Open Space requirement for properties within the VTZ, yet allowable uses within the Greenway RMA itself as it is currently mapped shall be in compliance with GS Policy 2.5 contained elsewhere in this Chapter 8.”* In addition, the *Open Space (VTZ)* definition has been updated within the proposed text amendment language to clarify that *“Open Space can be used for parks, recreation, agriculture, conservation, preservation of native habitat and other natural resources, surface/irrigation water impoundment, historic, or scenic purposes. Allowable uses within the Greenway RMA itself as it is currently mapped shall be in compliance with GS Policy 2.5.”*

STORMWATER

1. Application is *Sufficient*.

Response: It is noted that Stormwater finds that the Application is Sufficient, thank you.

UTILITIES DEPARTMENT

1. Application is *Sufficient*.

Response: It is noted that the Utilities Department finds that the Application is Sufficient, thank you.

MITIGATION & RESTORATION

1. Application is *Sufficient*.

Response: It is noted that Mitigation and Restoration finds that the Application is Sufficient, thank you.

Best regards,

STANTEC CONSULTING SERVICES INC.



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