Diana Watters
273 Mestre Place
N. Venice, FL 34275

April 9, 2025

Subject: Appeal of Planning Commission's Approval of Site and Development Plan Petition No. 22-40SP for the Development of a Shopping Center in the Milano PUD Located at the Southwest Corner of Laurel Road and Jacaranda Boulevard

Dear Venice City Council Members:

Surely, the developer can't build a 70,000-square-foot shopping center there. Wrong. The City of Venice continues to greenlight this project for Neal.

The city of Venice had multiple opportunities to protect their residents. They chose not to. The 10.4 acres should have been formally dedicated as open space in perpetuity.

Another regulation was explicit — commercial in a PUD is meant to serve the PUD only. The city failed to enforce both.

Unbeknownst to Cielo residents, their HOA Board (while still controlled by Neal) transferred the 10.4 acres back to Neal. The lone Board member chosen by the Cielo residents had no knowledge. The City Council reaction? A shrug of the shoulders — not our problem.

A group representing residents of North Venice sued to challenge the rezoning decision. The Circuit Court denied the appeal. The ruling judge was nominated by Neal. How about those optics?

At a recent Planning Commission meeting, the residents complained that the 7-lane intersection outside the Venetian was unsafe without a traffic light.

An exchange ensued — who would "have blood on their hands?" The City or the County? The Planning Commission approved the site plan with this unresolved dangerous condition.

In his concluding remarks, Neal noted he has only ever sued the city of Venice. Was that a threat?

In concluding, all I can say is Welcome to Venice — A Neal Community.

Respectfully Submitted,

Diana P Watters

Diana Watters

April 8, 2025
Venice Planning Commission
Re: Proposed Neal Shopping Center on Laurel Rd.

Our names are Dawn Rhodes & Ron DiGiovine, I live in Venetian Golf & River Club on Avalini Way, my home is adjacent to Laurel Road and across from the firehouse, this is located where the proposed new traffic light will be installed. Along this portion of Laurel Road, we have only a fence line with little foliage barrier due to the last 3 hurricanes. No wall was installed 23 years ago because this high traffic was not anticipated.

Widening of Laurel Rd and placing a light at Jacaranda will destroy our homes privacy and home value. There was no consideration of the impact to our homes with the high density of traffic.

If a shopping center with high volume of traffic is to be built, we are completely against it. It will have the following implications:

1. Noise
2. Traffic which will become too much for the current density we have
3. Loss of more wetland and habitat for our wildlife
4. Safety: Danger for those living in the VGRC in traffic exiting and entering our community
5. Flooding danger (we already had our streets flooded during Hurricane Ian with fish!)
6. Lighting- there will be street lights and headlights shining in my home
7. We already have 3 Publix close to our homes, we have no need for a fourth!
8. The current Laurel Road Publix shopping strip is not full occupancy and has availability for new stores, please fill those before you add more shopping centers.
9. This shopping center Neal is proposing is Not Compatible with our residentials area
10. It is reducing the value of our home because of the increase of traffic on the widened road which is only a few bushes away from our property
11. The additional 10 acres that Neal took will also allow for another high traffic volume convenience store and possible gas station- Is this necessary

with the two other convenience stores at Laurel and Knights Rd. Again, not compatible with our properties and communities here.

12. There is no need for the road to be expanded on Laurel Rd to 7 lanes, entrances for the shopping center should come off from Jacaranda.

13. Why would there be any need at all to expand Laurel Road size between Jacaranda and the Venice Park? This stretch of road only services Vincenza, the exit to VGRC and the park. This is a traffic nightmare, and will cause accidents for residents trying to make left turns out of VGRC. The City of Venice will be held accountable for accidents here!

As an alternative we suggest:

1. An alternative to the high-density strip mall; Medical building or medical offices which would help the SMH Venice Hospital down the street and people in the community
2. A wall **must** be constructed all along Laurel Road from Jacaranda down to the exit gate of the VGRC to protect from the added density and traffic, this at the **expense of the developer, or the City of Venice** whom approved this complex, without thought to those living here.
3. Street lighting must be of a restricted height and brightness
4. Move the main entrance of shopping center to Jacaranda for a safer entrance.

Please help save our community from becoming over developed. It is not the Venice we moved here for. It is becoming a place for developers to place any cheap housing and strip malls. Enough! Half of what is currently available is not occupied. Please use what we already have and keep our area with a sense of relaxation, good architecture and community!!!

I hope that our voice and those of my neighbors will be considered and not allow developers to ruin our community.

Dawn Rhodes / Ron DiGiovine / 147 Avalini Way / Cell: 517-712-0449

Ruth Cordner
246 Montelluna Dr.
N. Venice, FL 34275

April 9, 2025

Subject: Appeal of Planning Commission's Approval of Site and Development Plan Petition No. 22-40SP for the Development of a Shopping Center in the Milano PUD Located at the Southwest Corner of Laurel Road and Jacaranda Boulevard

Dear Venice City Council Members:

The Planning Commission chair, Barry Snyder, in his comments at the January 7th Planning Commission meeting, stated "SWFWMD makes final approval on stormwater". This is not entirely correct.

The following is from Chapter 87 of the Land Development regulations, Section 3.3:C. Stormwater Facilities.

2. Stormwater facilities must provide adequate disposal of surface water, maintain any natural watercourses, and provide that historic drainage patterns from adjacent parcels shall be maintained.

3. Stormwater facilities adjacent to regions with historical flooding or ponding shall minimize impacts and be designed to not further increase discharge volume in the region.

Stormwater facility designs are to be submitted for approval by the City Engineer through the site and development plan process or as part of construction plan review.

5. The engineer is to provide the following statement on all plans requiring a SWFWMD permit: "The post-development runoff will not exceed the pre-development runoff for a 25-year, 24-hour storm event."

6. Drainage calculations must be provided to verify that the peak flow rate and total volume, do not exceed the pre-developed runoff.

Proposed development runoff may not additionally impact areas of existing flooding or ponding nor negatively impact adjacent property.

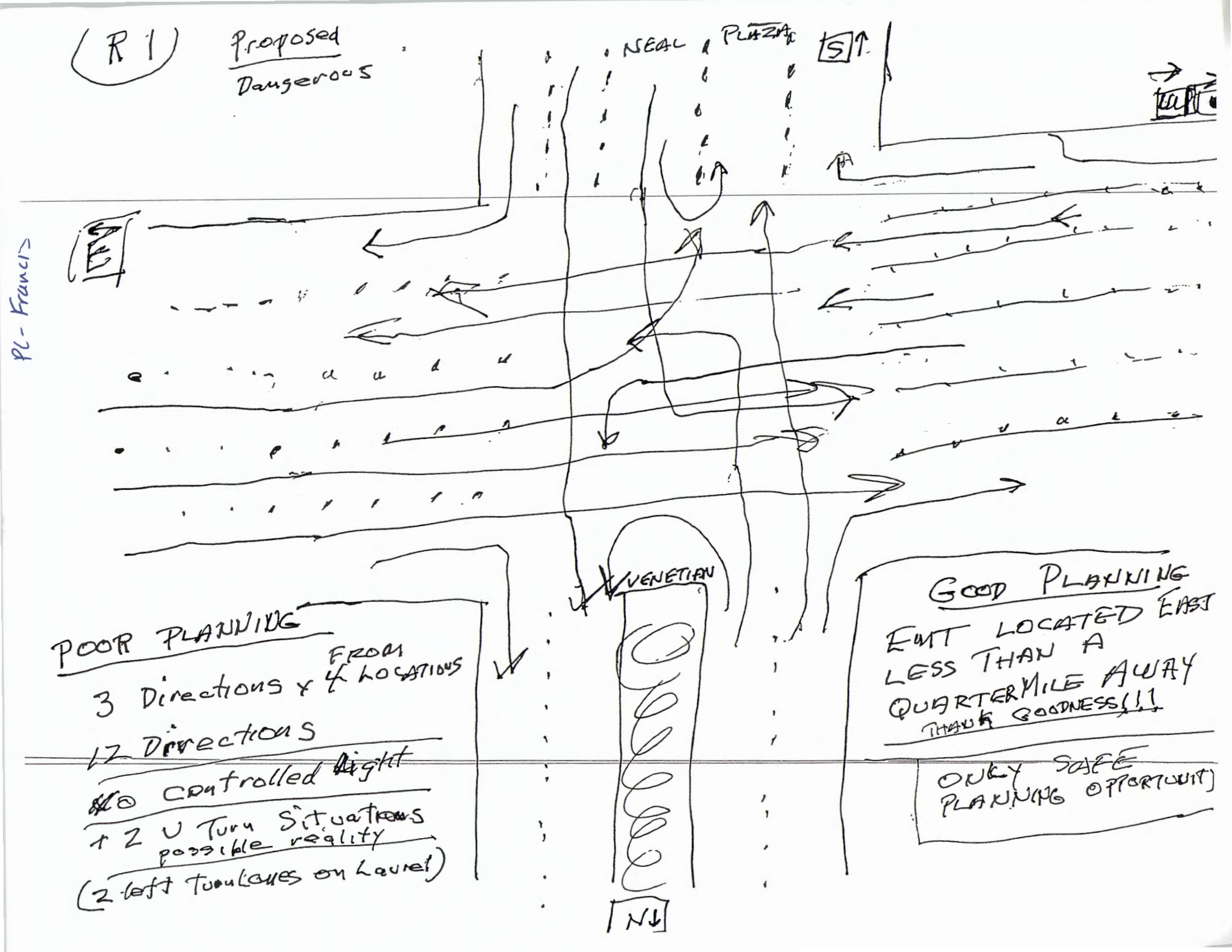
a. The stormwater collection system shall be designed in order to completely capture and convey the runoff for the 25-year, 24-hour storm event, unless otherwise determined by the City.

Chairman Snyder of the Planning Commission believes that SWFWMD makes the final approval on stormwater in the city of Venice. The forementioned city regulations dictate otherwise. The city is approving this site plan, of which the stormwater system is a vital component. Per these sections of Chapter 87, the city certifies the plan and has the authority to mandate a better design.

So, today, the ball is in your court. Thank you!

Respectfully Submitted,

Ruth Cordner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THANK GOODNESS!!!
ONLY SAFE
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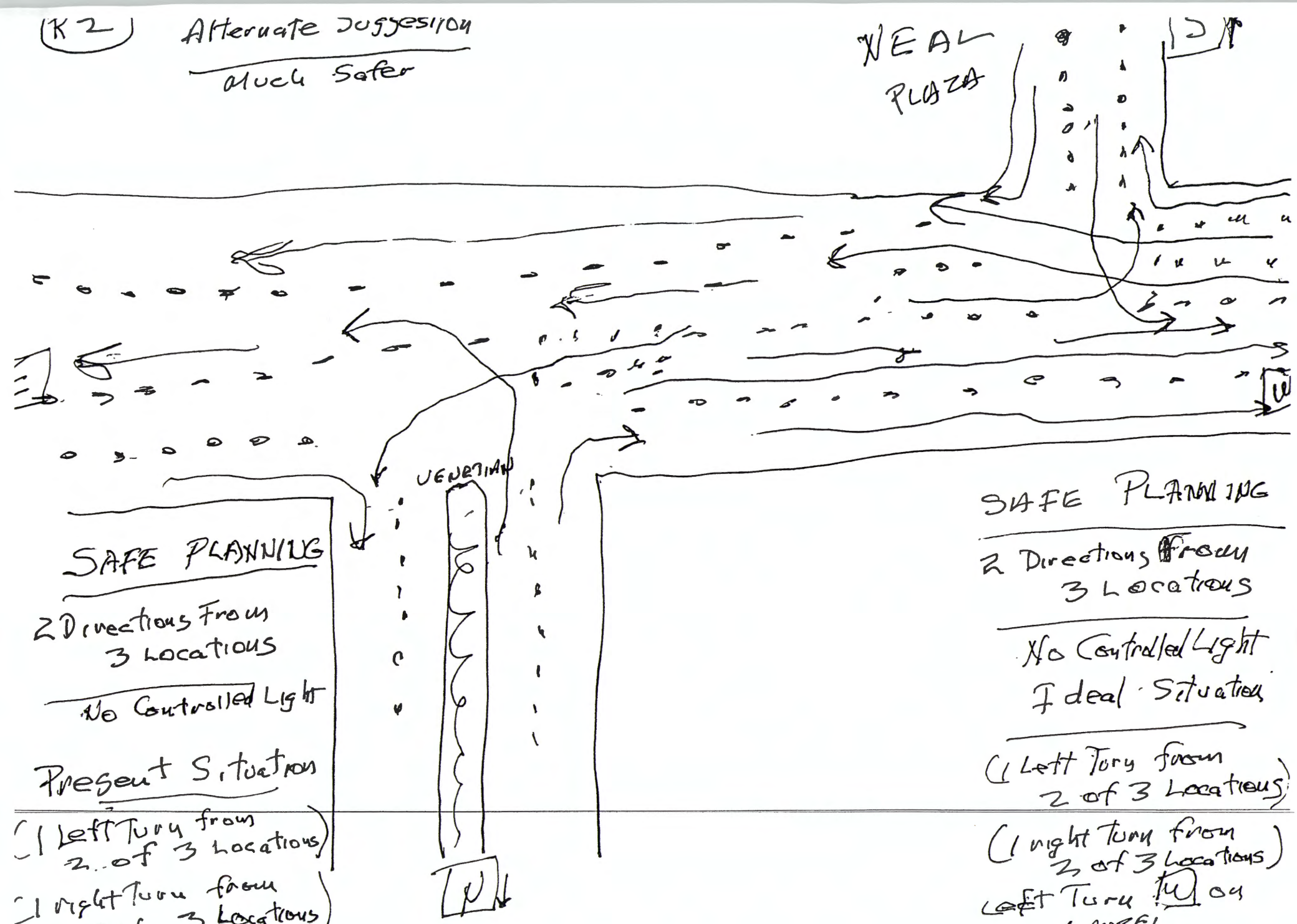
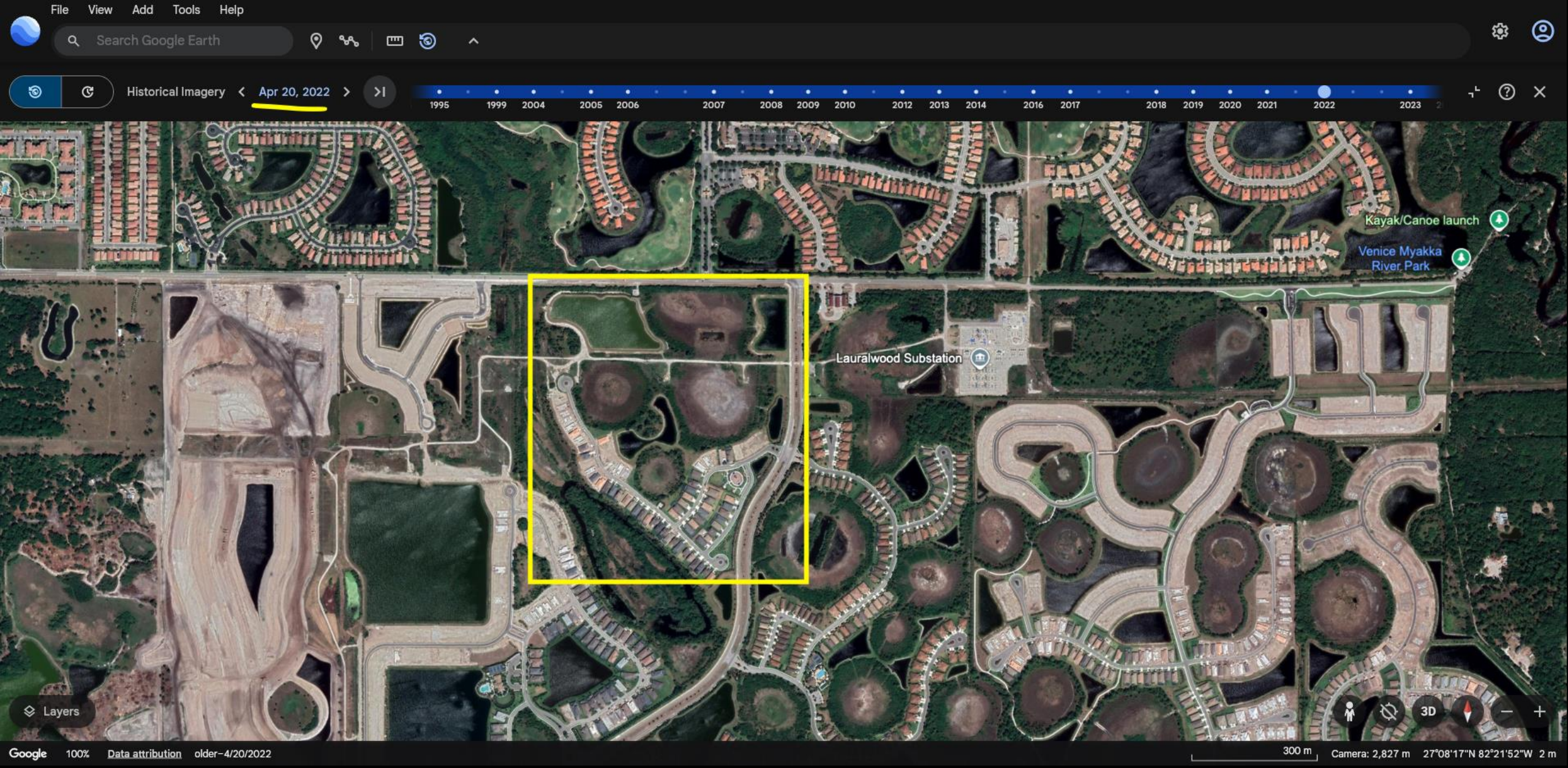
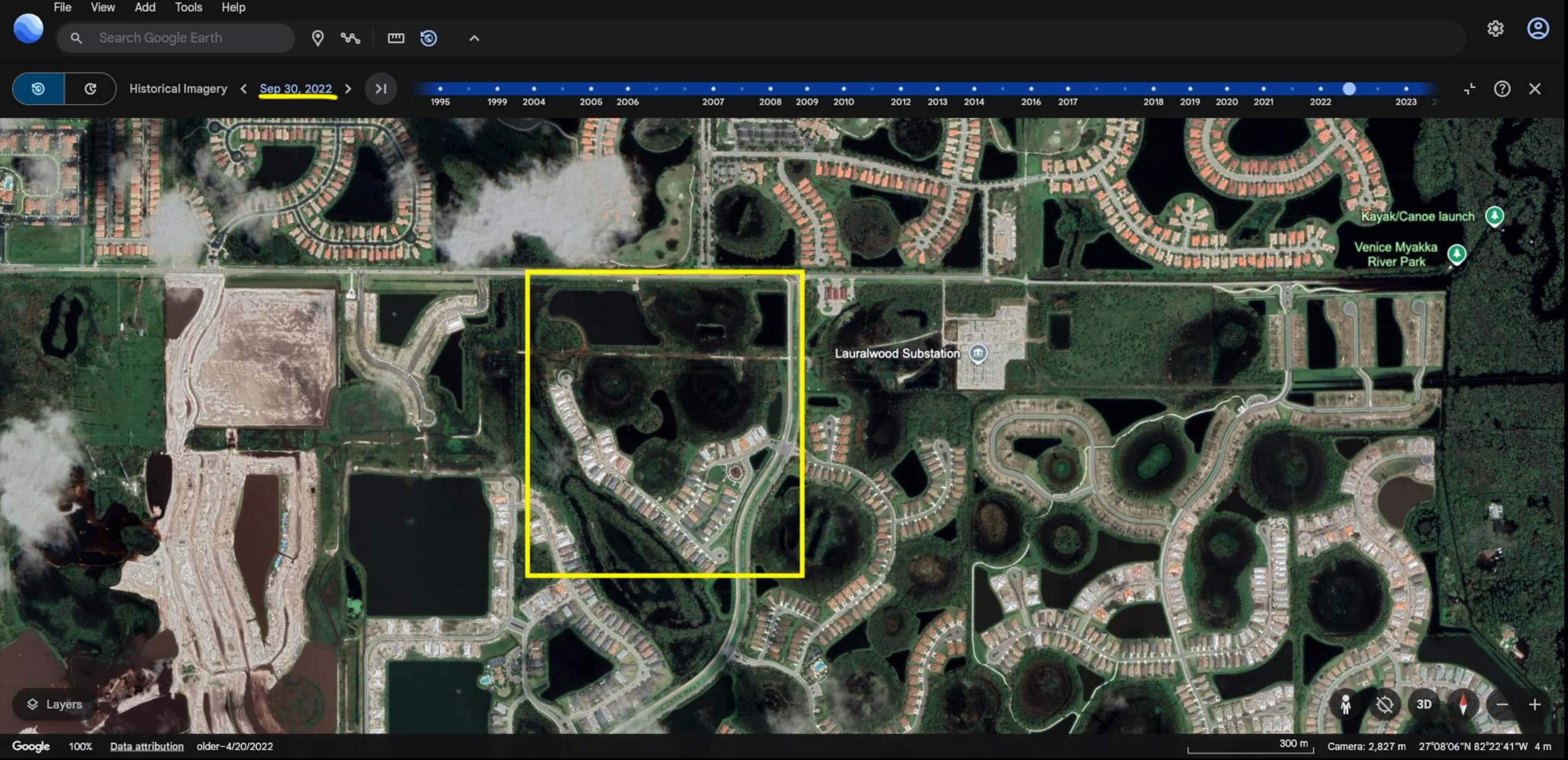
(K2) Alternate Suggestion

Much Safer

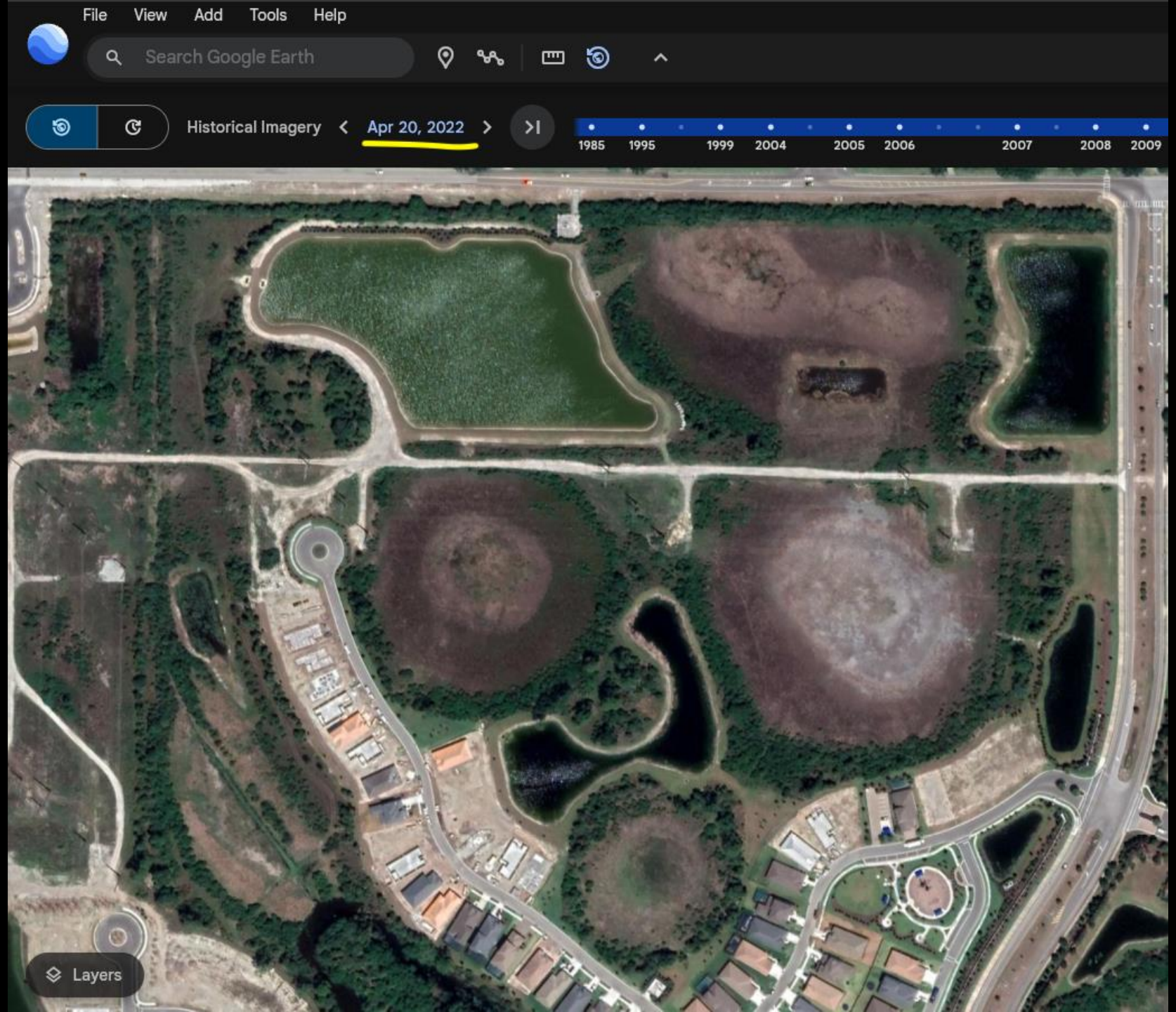




Cielo and former Cielo property April 20, 2022



Cielo and former Cielo property 48 hours post Ian after ~18 inches of rainfall.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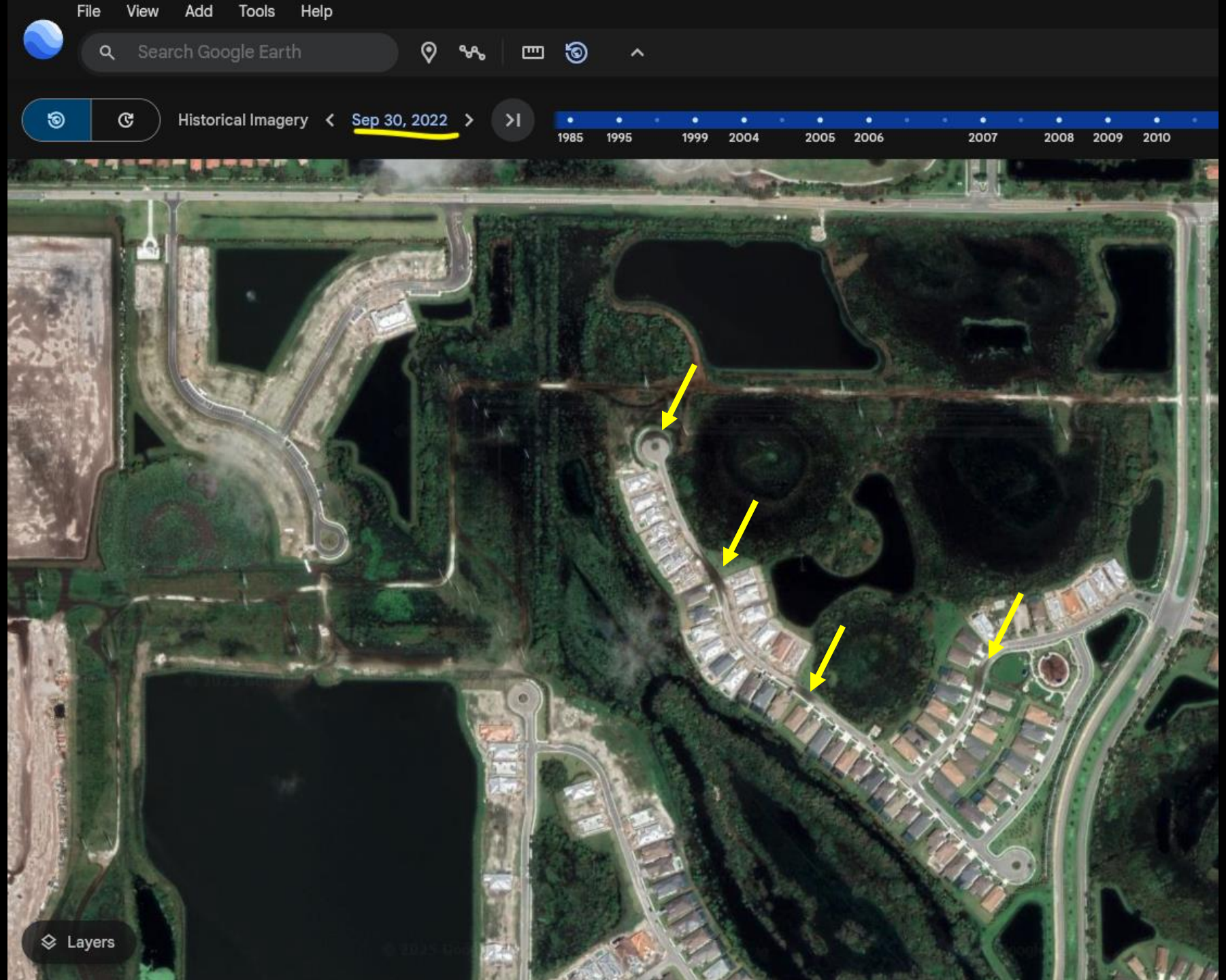
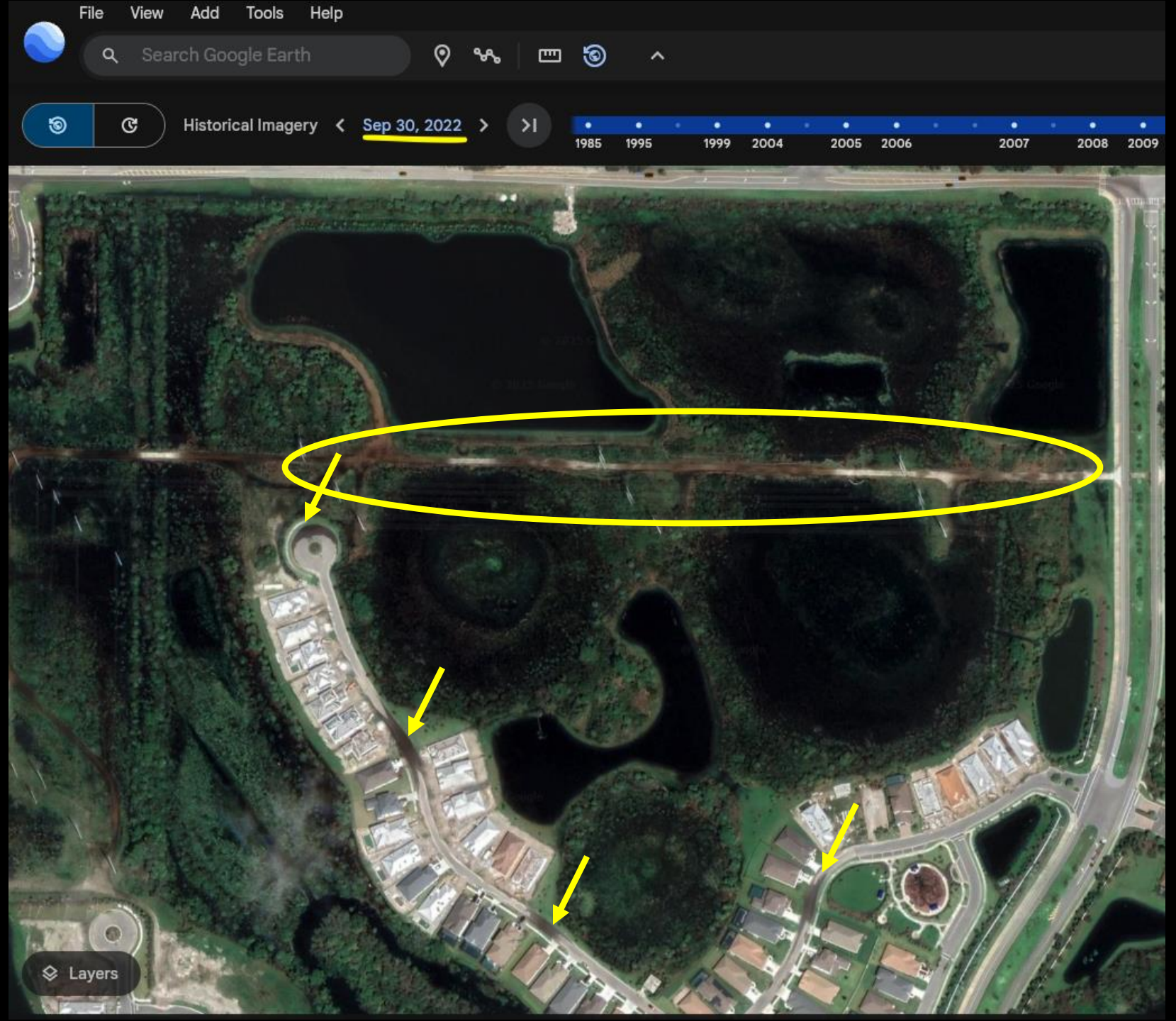
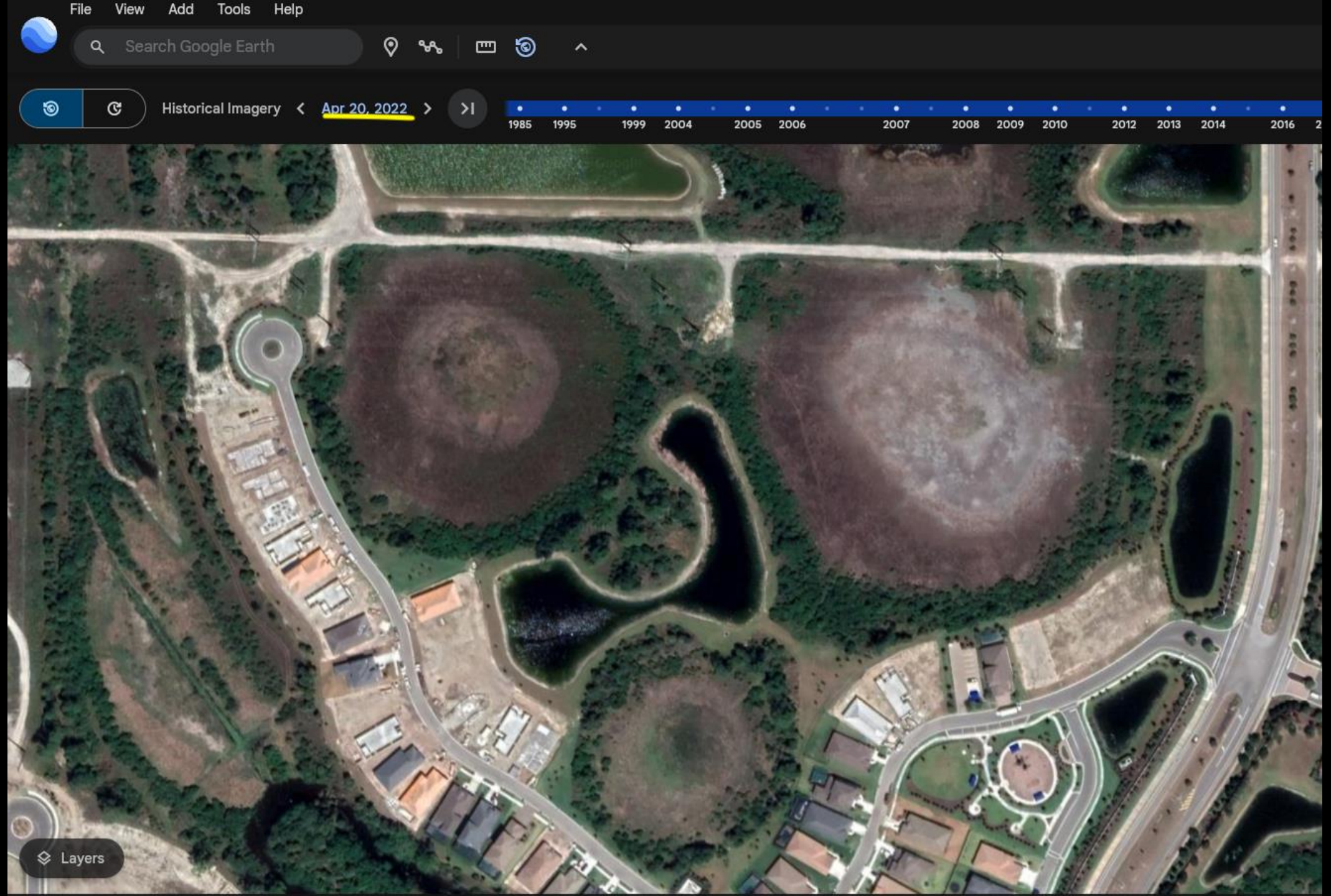
Standing, deep water 48 hours post Ian. All flooded locations are where storm water management inlets are located. The inlets became outlets during and post Ian.



Inundation from the pond and wetlands that would be removed with this project.

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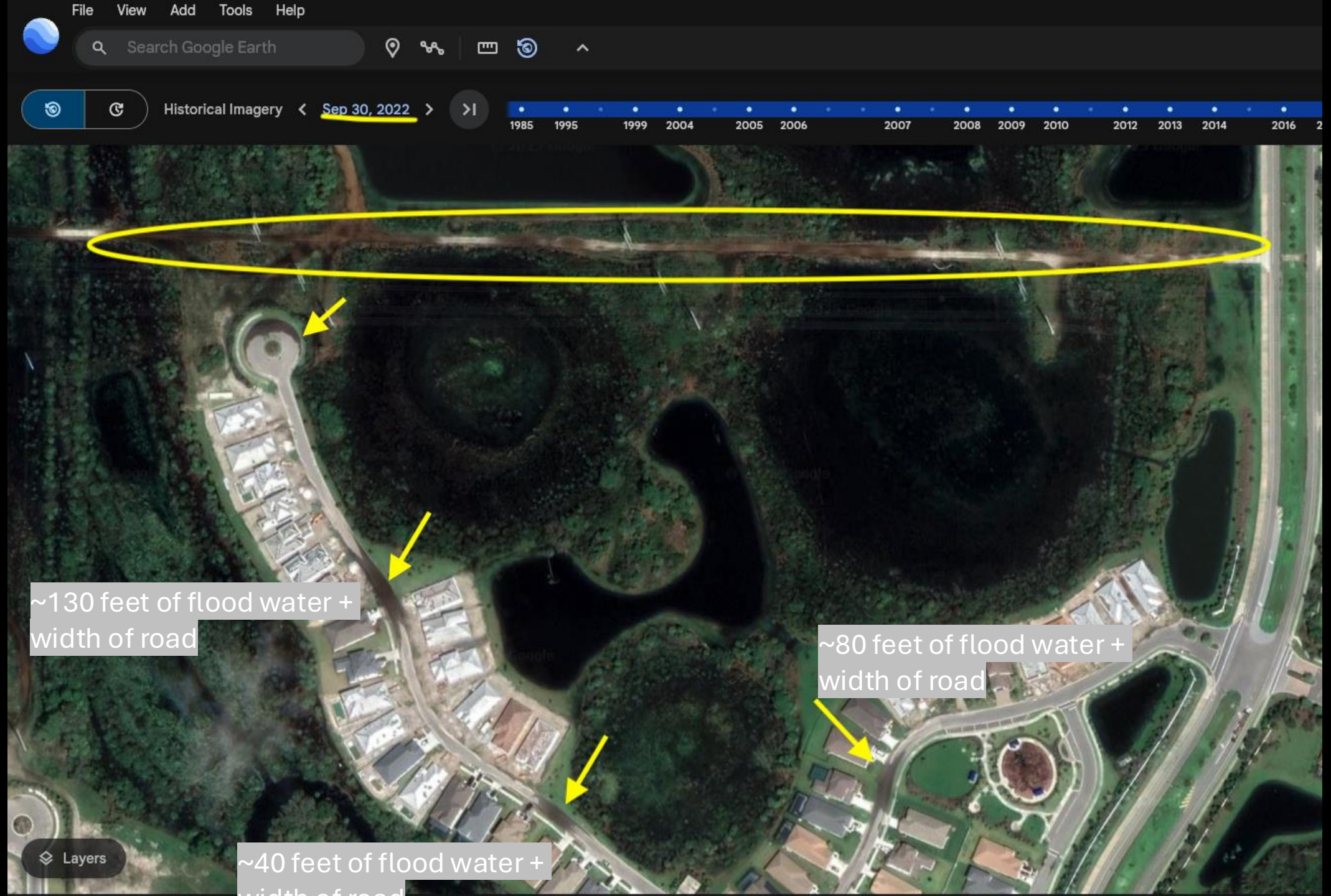
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~130 feet of flood water + width of road
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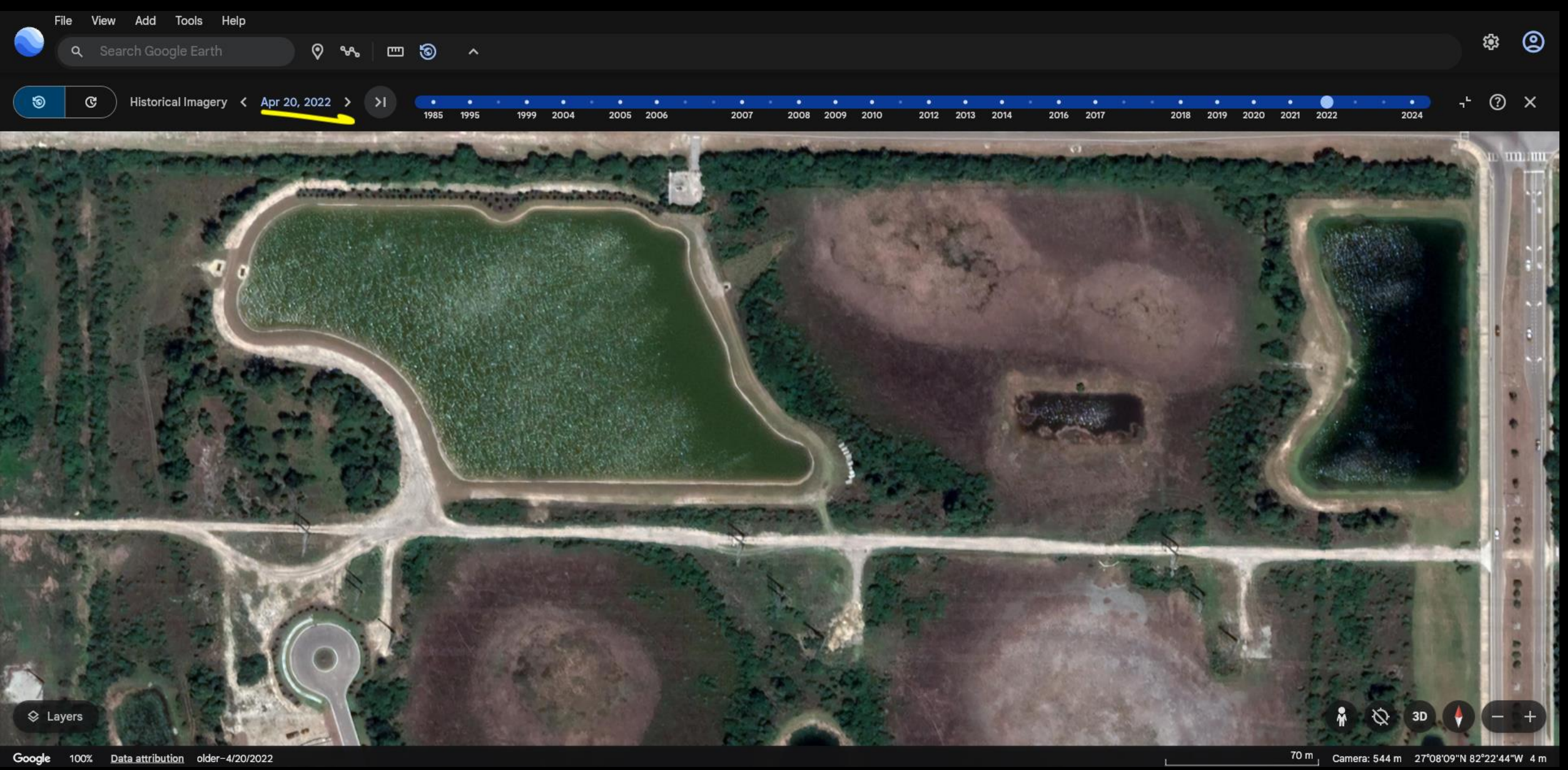
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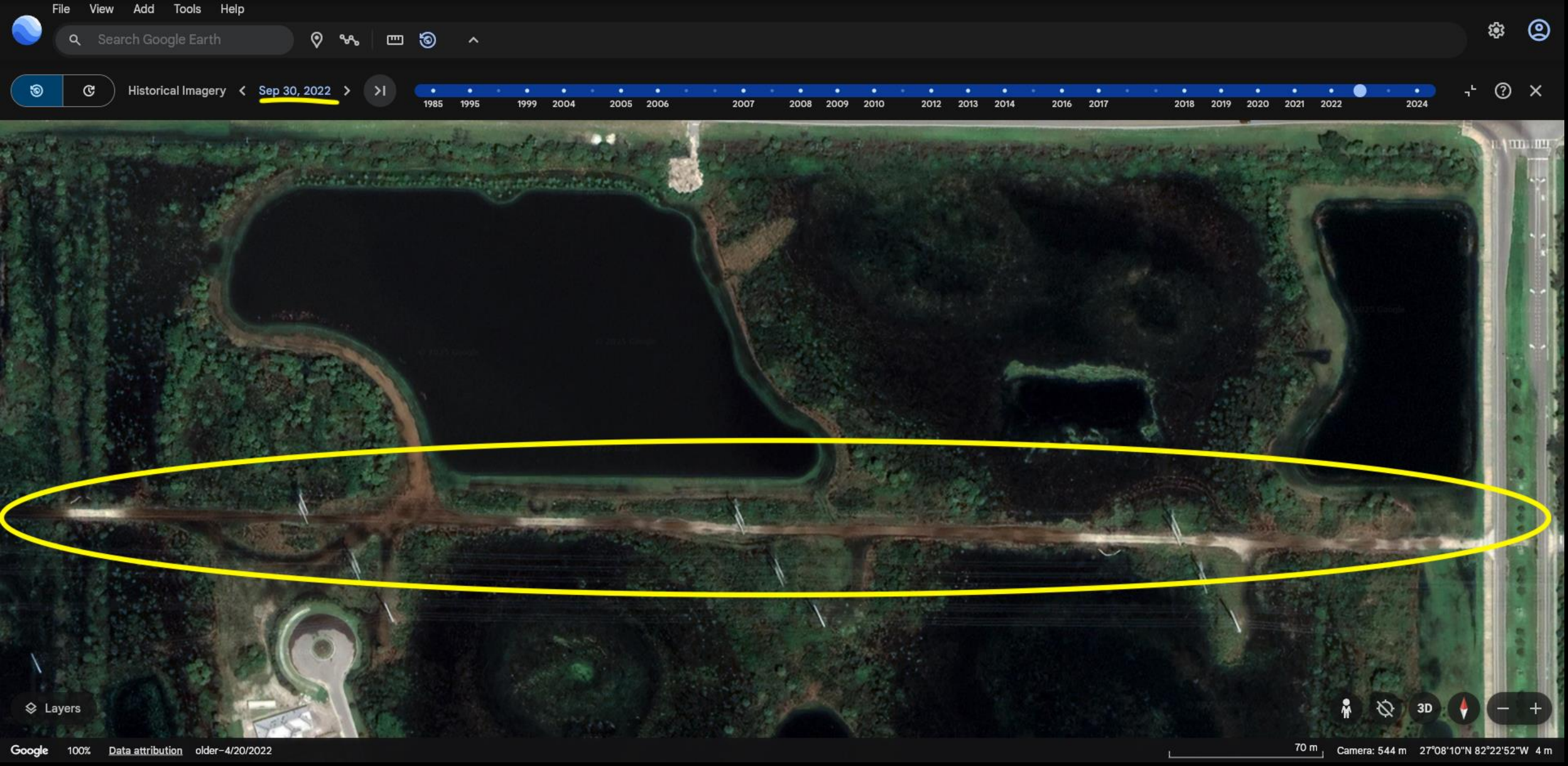
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TO: Mayor Pachota

Venice City Councilmembers

FROM: Kenneth Baron

SUBJECT: Safety and stormwater concerns: *Village at Laurel and Jacaranda Site and Development Plan Petition No. 22-40SP*

I am Kenneth Baron, an Aria resident and board member of the North Venice Neighborhood Alliance. I am not an appellant in this matter nor am I writing this letter as a NVNA board member. I am writing this letter to you as a concerned resident who is wary of this project and its effect on safety in my community.

During the 7 January 2025 Planning Commission meeting, the applicant's attorney questioned why area residents did not meet with county commissioners to appeal for a traffic light at the intersection of Laurel Road, Veneto Blvd, and the entrance to the proposed commercial site. While the county commissioners expressed no interest in meeting with us, the Publics Works staff did. On 18 March 2025, Olen Thomas and I met with traffic and stormwater engineers from the Sarasota County Public Works department. The primary topic was a traffic light at this intersection. The secondary topic was stormwater and its relationship to the Laurel Road widening project. I will

summarize these meetings and address my concerns individually.

As we all know, there is a traffic signal programmed for the intersection of Laurel Rd and Jacaranda Blvd. Sarasota County denied a traffic light at the intersection of Veneto Blvd (the entrance to the Venetian Golf and River Club, VGRC) and Laurel Rd. The current plan will be to have a two stop signs at this intersection: one at the exit of the VGRC and other at the proposed shopping center exit. There will be 13 different directions a driver can take when approaching that intersection. This IS a dangerous situation. Sarasota County's explanation for denial of the traffic signal is as follows:

While many believe a traffic signal solves all traffic problems, it is more of a detriment than an asset. The reason for this is that if a light is spaced less than 1,320 feet from another light, it will lead to traffic back-ups at the first light, in this case, the light at Laurel and Jacaranda. A traffic circle would likely have the exact same effect. Both may affect response times for the nearby fire station. If this site plan gets approved, Sarasota County's plan for the Veneto/shopping center intersection will be to study the types of crashes that occur and then determine a solution. The most likely implementable solution would be to install median barriers to prevent left hand turns out of the Venetian and the Villages. When the traffic engineer was asked what her solution would be if she were the developer, she stated, "I would move the entrance as far to the west as possible. This is a bad location for this project all around".

To my knowledge there are no transcripts for this meeting and quite frankly you do not have to take my word for this. The issues I have mentioned above are intuitive. This is an unsafe intersection no matter how you look at it. This is a mistake that I do not want rectified after one of my loved ones is "studied" following a car crash. I would ask that if this project MUST be approved due to fears of a lawsuit from the applicant, you approve it conditionally based on the applicant moving the entrance to the shopping center to a safer location.

In addition to the traffic signal issue, we also discussed stormwater concerns, primarily those associated with the Laurel Road widening project. Before highlighting this meeting, I need to illustrate the chronology of events which led us to this meeting.

Understanding that this project was already permitted by SWFWMD, the NVNA hired an independent stormwater engineer, Jennifer Menendez of Catalyst Engineering, LLC, in July 2024. The intent was to evaluate the impact of this project on surrounding neighborhoods. We asked Catalyst to consider if the stormwater system could handle the additional rate and volume of stormwater once a 6.6-acre wetland and its adjacent storage pond (LL-4) were filled in and paved over with impervious surface. The report from Catalyst Engineering is part of the public record and was presented at the 7 January 2025 planning commission. During this meeting, the applicant's stormwater engineer was asked by Chairman Snyder where the water from this

project was going. Mr. Lein replied, “I think to the southwestern lake….and probably ends up at Curry Creek…I don’t know….”. He also didn’t know if any of the lakes overflowed because of last year’s storms. (1’ 33” of 7 January 2025 planning commission meeting) When the applicant’s attorney asked the engineer if he agreed with the report from Catalyst Engineering, he stated “No, I do not”. Not an unanticipated answer given the fact that it was not an independent assessment. Both answers the engineer provided to the commission were not, in my opinion, “competent and substantial”. In addition, the Planning Commission chair, in his comments, stated the “SWFWMD makes final approval on stormwater”. This is not entirely correct, and I am very concerned that the planning commission ignored this report. This is not my definition of protecting citizens and their property. The complete disregard for our concerns precipitated the meeting with the Sarasota County Stormwater department and the Southwest Florida Water Management District (SWFWMD). I will summarize both and illustrate why the applicant’s stormwater plan must be scrutinized.

I e-mailed the Catalyst report to Dan Golus, a senior engineer with SWFWMD, on 24 January 2025. In the e-mail, I told him of our concerns with the approved stormwater system for this project and our concerns of flooding in the wetlands adjacent to Cielo. He replied immediately and stated he would investigate our concerns once he was up to speed on the project. On 24 February I contacted Mr. Golus, and he scheduled a virtual meeting with me and Jennifer Menendez for 26 February. During our meeting, Mr. Golus saw the model discrepancies in the

outfall structure and bubble up identified by Ms. Menendez. Mr. Golus told us he would follow up with Brandee Alexander, the SWFWMD engineer who reviewed the stormwater application. They would investigate the issue further and would follow up in a few weeks. On 4 April I called Mr. Golus for a status update. I was told that he and Ms. Alexander didn't have the time to review the calculations because "they could barely keep up with the over 1400 applications they already have". He also cited the fact that there are over 13,000 pages of calculations and he didn't have time to review them but asked if Ms. Menendez could review the calculations and "point him in the right direction". Ms. Menendez previously identified this exact issue in her opinion, writing that reviewing a 13,517-page report with no summary page is "overwhelming to review" and "does not lead to a thorough review due to time constraints of the reviewer". I would imagine that this, in-fact, is the case and is precisely why this stormwater plan must be scrutinized by the city.

Our meeting with the Sarasota County Stormwater Division centered around the Laurel Road widening project and its effect on stormwater in the area. We were told that the runoff would likely go east to the Myakka River. We were further informed that the ponds in the local area, including LL-7, are joint use ponds and that some runoff from the Laurel Road project may enter them. Pond LL-7 is the pond to the west of this project and is proposed to accept runoff from the Village. This same pond is currently

in use by the Cielo and Fiore. For this project, Pond LL-7 WILL NOT be modified to accept additional runoff.

We also learned that Sarasota County has more restrictive stormwater criteria than the SWFWMD. Here is a chart from the Sarasota County "Stormwater Manual":

3.1 COMPARISON OF COUNTY AND SWFWMD CRITERIA

The UDC explicitly adopts SWFWMD criteria provided in SWFWMD's *Permit Information Manual* and applicants are directed to SWFWMD's *Environmental Resource Permit (ERP) Applicants Handbook I and II* for further guidance on state criteria. The County requires additional stormwater design criteria that are established in the UDC as summarized in Table 3.1.

Table 3.1 Summary of Additional Stormwater Design Criteria

Design Criteria	Sarasota County	SWFWMD
Regulated design storm return periods	10-year, 25-year, and 100 year	25-year
Treatment volume for dry retention ponds	1 inch of rainfall	0.5 inch of runoff
Treatment volume for wet detention ponds	1 inch of runoff	1 inch of runoff
Treatment volume when discharging directly into saltwater tidal systems, bays, or the gulf	1.5 X required treatment	No additional treatment criteria
Demonstration of no adverse impact via watershed-scale modeling[1]	Required when land development equals or exceeds 35 acres total area or 8 acres impervious area	Not required for land development
Definition of adverse off-site impact	0.01 foot or more of model-predicted stage increase[2]	No quantitative definition

[1] SWFWMD uses presumptive flow criteria (pre-development peak discharge greater than or equal to post-development peak discharge) to protect against adverse impacts. Sarasota County uses presumptive flow criteria for projects less than 35 acres total area and less than 8 acres impervious area.

[2] The County may allow model-predicted stage increases that do not create adverse off-site impacts.

Furthermore, we were informed that the city of North Port is leaning forward in their approach to stormwater management for new development. They are requesting that developers model stormwater systems for a 100-yr/24-hour event versus the 25-year/24-hour event mandated by SWFWMD. This will become mandatory in 2027. The City

of North Port stormwater engineer e-mailed me the following LDR excerpt after I cold called him and with the understanding that I am not a North Port resident:

IV.	**New Site Development:** : The available stormwater pond attenuation volume for new site developments must be capable of attenuating for the 100-year 24-hour duration storm per SWFWMD criteria. Within a new development, the stormwater runoff piping and conveyance system hydraulic grade line (HGL) analysis shall be based on a 100-year 24-hour duration storm event and shall not cause any adverse flooding impacts on-site or off-site. Deliberate flooding of a parking area in a 100-year 24- hour duration storm event is not allowed. The tail water for the HGL analysis shall be based on the stage in the receiving pond at the time of peak flow. For the HGL analysis, The City Stormwater Manager can allow a greater level of flooding during the peak of a 100-year 24-hour duration storm event on a case-by-case basis, if sufficient documentation is provided to show that this level of flooding cannot be avoided, and the flooding can be demonstrated to not adversely impact public health and safety, natural resources or other property. The flood depth and duration of the flooding must be defined in the attenuation analysis, and justification provided to show why public health and safety is not compromised. This regulation will become effective on July 1, 2027, or upon amendment, expiration, or repeal of Chapters 2023-304 and 2023-349, Laws of Florida; voluntary compliance is encouraged in advance of the effective date of this provision.

The City of Venice stormwater standards may be found in Chapter 87, Section 3.3 of the Land Development Code. Important points are highlighted in yellow.

C. Stormwater Facilities. It shall be the developer's responsibility to provide all necessary stormwater facilities such as stormwater culverts, pipes, junction boxes, outfalls, swales, canals, structures, ponds, drainage wells, and all other associated improvements to serve the proposed development. The developer shall obtain an approved SWFWMD permit, permit modification, or exemption prior to commencement of construction activities. A complete stormwater management system shall be provided in all areas of development.

1. All stormwater facilities shall be designed and installed under the direction and supervision of a state-licensed professional engineer and in accordance with the City Standard Details.

2. Stormwater facilities must provide adequate disposal of surface water, maintain any natural watercourses, and provide that historic drainage patterns from adjacent parcels shall be maintained.

3. Stormwater facilities adjacent to regions with historical flooding or ponding shall minimize impacts and be designed to not further increase discharge volume in the region. Stormwater facility designs are to be submitted for approval by the City Engineer through the site and development plan process or as part of construction plan review.

4. In areas where high groundwater exists and it is deemed necessary by the City Engineer for the protection of paved streets, underdrains shall be installed.

5. The engineer is to provide the following statement on all plans requiring a SWFWMD permit: "The post-development runoff will not exceed the pre-development runoff for a 25-year, 24-hour storm event."

6. Drainage calculations must be provided to verify that the peak flow rate and total volume do not exceed the pre-developed runoff. Proposed development runoff may not additionally impact areas of existing flooding or ponding nor negatively impact adjacent property.

a. The stormwater collection system shall be designed in order to completely capture and convey the runoff for the

25-year, 24-hour storm event, **unless otherwise determined by the City.**

b. The City's EPA/NPDES permit guidelines are to be followed in stormwater system design.

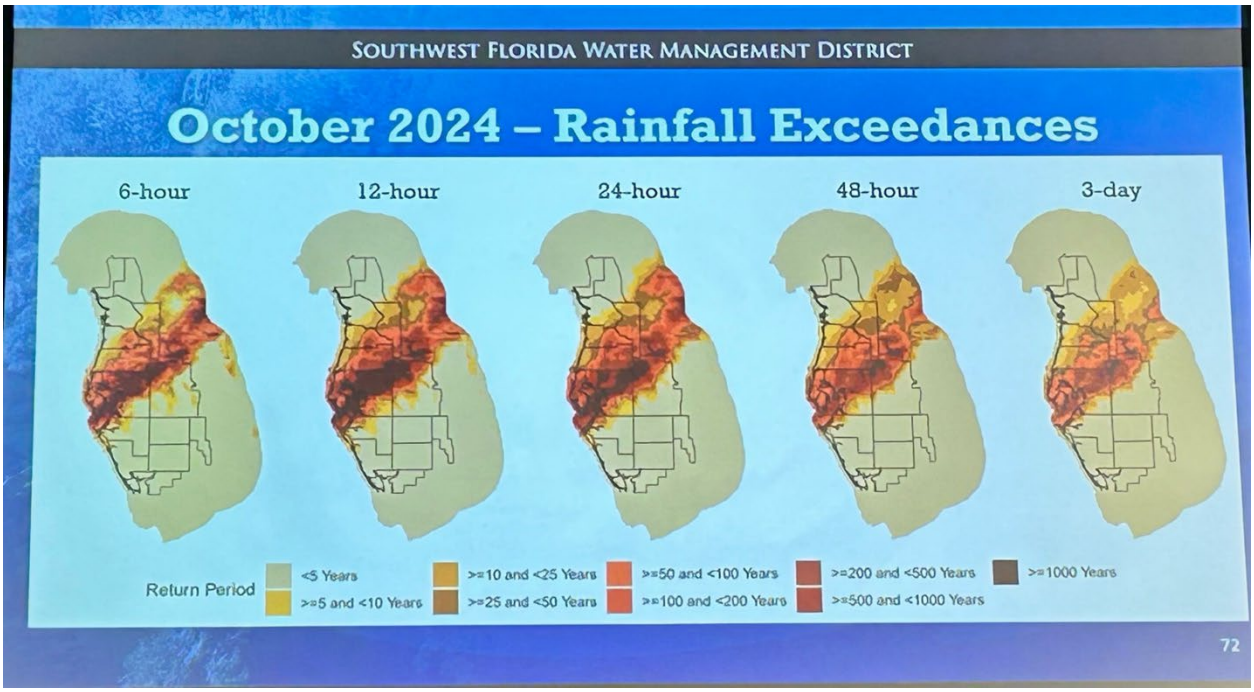
c. Best management practices (BMPs) are to be followed in all permanent constructed systems and in all construction procedures in accordance with the City Standard Details, and all other applicable local, state and federal requirements.

Chairman Snyder of the Planning Commission believes that SWFWMD makes the final approval on stormwater in the city of Venice. The city regulations above dictate otherwise. The city is approving this site plan, of which the stormwater system is a vital component. Per the sections of Chapter 87 highlighted above, the city certifies the plan and has the authority to mandate a better design.

The standards being used by the SWFWMD are based on rainfall amounts from the late 1980's. While the standards utilized by Sarasota County are more stringent, their rainfall amounts are also outdated. During two recent Sarasota County stormwater workshops, many of the county's commissioners expressed concern about this. Commissioner Neunder stated that the fact that the county is working under standards from 1992 gives him heartburn. Commissioner Cutsinger stated, "….part of the solution may be to revise those standards higher based on more current data." At a Sarasota County Commission workshop

on 21 January 2025, professional hydrologist Stephen Suau presented an independent study of the flooding caused by Tropical Storm Debby.

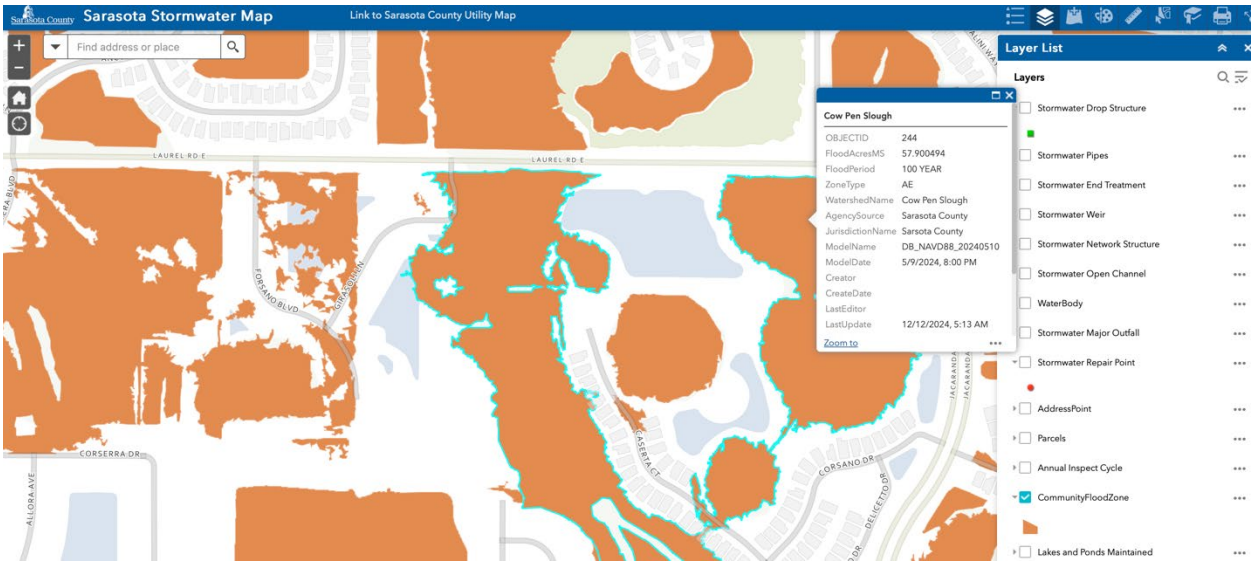
Mr. Suau concluded that SWFWMD and Sarasota County standards are based upon rainfall data nearly 30 years old. He recommended that Sarasota County, SWFWMD and other appropriate authoritative and academic agencies work together to update rainfall volumes for planning and regulatory purposes. This would include updating rainfall amounts using NOAA Atlas-14 standards and potentially modeling storms up to 500-year storms and multi-day storm events. The slide below, from the SWFWMD Board of Governors Stormwater workshop on 25 March 2025, depicts the rainfall Hillsborough County received on 9 October during Hurricane Milton. It is consistent with a 1000-year storm.



Mr. Suau's findings were debated by the Sarasota County Commission on 12 March 2025. The commission expressed further interest in strengthening the stormwater modeling requirements, but chose a "wait and see approach" contingent on changes SWFWMD would make at their 25 March meeting. This workshop, which I attended, was only an informational session for its Board of Governors. They will be debating change over the next several months.

Another important item which must be addressed are the flood zone maps. Currently, FEMA shows the subject 10.4 acres as Zone X. It should be noted that this is based on information from 2014. The Sarasota County Flood Hazard Area map, which is current up to 2020, classifies the

wetland which will be filled and made impervious, as well as the wetlands adjacent to Cielo, as being in Flood Zone AE.



Once Pond LL-4 and the wetland are filled, there will be no floodplain compensation when a 100-year/24-hour storm is considered. With no proposed modification of Pond LL-7, and this flood zone information, it begs the question “where will this water go and are the adjacent homes at risk?”

I have taken the time to write this lengthy letter because it is important, and you are faced with a decision where residents’ lives and property hang in the balance. The key stormwater issues are:

1. A 10.4-acre parcel containing a 6.6-acre wetland and adjacent retention pond will be filled in, paved over and made impervious. This means more and faster runoff.
2. A professional stormwater engineer identified inaccuracies in the applicant’s stormwater

calculations, calculations made with out-of-date rainfall amounts and identifying that the pond and wetland intended to receive stormwater runoff from this project (and Fiore and Cielo) will not being modified. SWFWMD clearly missed this when reviewing the applicant's 13,517-page report.

3. Drone video taken **6 days** after Tropical Storm Debby showing inundated wetlands adjacent to homes in Cielo. https://youtu.be/TZw15RLs2ns?feature=shared

4. A city regulation which states that engineers will certify that post-development runoff will not exceed pre-development runoff for a 25-year/24-hour storm. A 25-year storm produces about 8.5 inches of rain using 30-year-old standards. Consider that Hurricane Ian dropped 15 inches of rain in a 24-hour period and T.S Debby produced 9-12. (Slide from City of North Port Website)

Takeaway #2 - Stormwater system design

The permitted stormwater system was designed with a full build out plan at a 5-day, 10-year storm.

- Both how much rain *and* how quickly it falls make a difference in stormwater management.

PDS-based precipitation frequency estimates with 90% confidence intervals (in inches)[1]

Duration	Average recurrence interval (years)									
	1	2	5	10	25	50	100	200	500	1000
5-min	0.580 (0.481-0.695)	0.652 (0.540-0.782)	0.765 (0.631-0.921)	0.856 (0.702-1.04)	0.976 (0.768-1.21)	1.06 (0.818-1.35)	1.15 (0.851-1.50)	1.23 (0.871-1.66)	1.33 (0.905-1.86)	1.41 (0.930-2.01)
10-min	0.849 (0.704-1.02)	0.954 (0.790-1.14)	1.12 (0.925-1.35)	1.25 (1.03-1.52)	1.43 (1.12-1.78)	1.56 (1.20-1.98)	1.68 (1.25-2.20)	1.80 (1.28-2.43)	1.95 (1.32-2.72)	2.06 (1.36-2.94)
15-min	1.04 (0.858-1.24)	1.16 (0.964-1.40)	1.37 (1.13-1.64)	1.53 (1.25-1.85)	1.74 (1.37-2.17)	1.90 (1.46-2.41)	2.05 (1.52-2.68)	2.20 (1.56-2.86)	2.38 (1.62-3.32)	2.51 (1.66-3.59)
30-min	1.57 (1.30-1.88)	1.76 (1.46-2.12)	2.07 (1.71-2.49)	2.32 (1.90-2.80)	2.64 (2.08-3.28)	2.88 (2.21-3.65)	3.11 (2.30-4.06)	3.33 (2.36-4.49)	3.61 (2.44-5.02)	3.80 (2.51-5.43)
60-min	2.04 (1.69-2.45)	2.29 (1.89-2.74)	2.68 (2.21-3.22)	3.00 (2.46-3.63)	3.43 (2.70-4.28)	3.75 (2.89-4.76)	4.07 (3.01-5.32)	4.38 (3.10-5.91)	4.78 (3.25-6.68)	5.08 (3.36-7.25)
2-hr	2.51 (2.10-2.99)	2.81 (2.34-3.35)	3.29 (2.73-3.93)	3.68 (3.04-4.42)	4.21 (3.35-5.23)	4.62 (3.58-5.84)	5.02 (3.75-6.53)	5.43 (3.87-7.29)	5.96 (4.07-8.27)	6.35 (4.22-9.01)
3-hr	2.73 (2.29-3.24)	3.05 (2.56-3.62)	3.58 (2.99-4.26)	4.03 (3.34-4.82)	4.65 (3.72-5.77)	5.14 (4.01-6.49)	5.63 (4.23-7.32)	6.14 (4.40-8.24)	6.82 (4.69-9.46)	7.34 (4.90-10.4)
6-hr	3.07 (2.60-3.62)	3.47 (2.93-4.09)	4.15 (3.49-4.91)	4.75 (3.97-5.64)	5.62 (4.54-6.97)	6.32 (4.98-7.97)	7.06 (5.35-9.16)	7.84 (5.68-10.5)	8.93 (6.19-12.4)	9.79 (6.58-13.8)
12-hr	3.43 (2.92-4.01)	3.94 (3.35-4.61)	4.86 (4.12-5.70)	5.69 (4.79-6.71)	6.93 (5.67-8.60)	7.97 (6.34-10.0)	9.09 (6.95-11.8)	10.3 (7.51-13.7)	12.0 (8.28-16.9)	13.4 (9.03-18.6)
24-hr	3.92 (3.36-4.55)	4.54 (3.89-5.27)	5.67 (4.84-6.61)	6.73 (5.70-7.88)	8.36 (6.91-10.4)	9.75 (7.82-12.2)	11.3 (8.69-14.5)	12.9 (9.54-17.2)	15.3 (10.8-21.0)	17.2 (11.7-23.9)
2-day	4.66 (4.03-5.37)	5.34 (4.61-6.16)	6.63 (5.70-7.66)	7.85 (6.70-9.12)	9.76 (8.14-12.1)	11.4 (9.24-14.3)	13.2 (10.3-17.0)	15.2 (11.3-20.2)	18.1 (12.9-24.8)	20.5 (14.1-28.3)
3-day	5.18 (4.50-5.94)	5.96 (5.17-6.84)	7.40 (6.38-8.52)	8.73 (7.49-10.1)	10.8 (9.02-13.2)	12.6 (10.2-15.6)	14.5 (11.3-18.5)	16.6 (12.3-21.8)	19.6 (13.9-26.6)	22.0 (15.1-30.2)
4-day	5.64 (4.90-6.44)	6.49 (5.64-7.43)	8.03 (6.95-9.22)	9.44 (8.12-10.9)	11.6 (9.69-14.1)	13.4 (10.9-16.5)	15.3 (12.0-19.5)	17.4 (13.0-22.9)	20.4 (14.6-27.6)	22.9 (15.8-31.3)
7-day	6.88 (6.02-7.82)	7.83 (6.85-8.91)	9.50 (8.28-10.8)	11.0 (9.51-12.6)	13.2 (11.1-15.9)	15.0 (12.2-18.3)	16.9 (13.3-21.3)	19.0 (14.2-24.7)	21.9 (15.7-29.3)	24.2 (16.8-32.9)
10-day	7.99 (7.03-9.05)	9.01 (7.91-10.2)	10.7 (9.40-12.2)	12.3 (10.7-14.0)	14.5 (12.2-17.3)	16.3 (13.3-19.8)	18.2 (14.3-22.7)	20.2 (15.1-26.0)	22.9 (16.5-30.6)	25.1 (17.5-34.0)
20-day	11.2 (9.90-12.6)	12.4 (11.0-14.0)	14.5 (12.7-16.3)	16.1 (14.1-18.3)	18.5 (15.6-21.7)	20.3 (16.7-24.3)	22.1 (17.5-27.3)	24.0 (18.1-30.6)	26.4 (19.1-34.9)	28.3 (19.8-38.1)
30-day	13.9 (12.4-15.6)	15.4 (13.7-17.3)	17.8 (15.8-20.0)	19.7 (17.3-22.3)	22.3 (18.9-25.9)	24.2 (19.9-28.7)	26.0 (20.6-31.8)	27.8 (21.0-35.2)	30.1 (21.8-39.4)	31.8 (22.4-42.6)
45-day	17.6 (15.7-19.5)	19.4 (17.3-21.6)	22.3 (19.8-24.9)	24.6 (21.7-27.6)	27.5 (23.2-31.7)	29.5 (24.4-34.8)	31.5 (25.0-38.2)	33.3 (25.3-41.8)	35.5 (25.8-46.2)	37.0 (26.2-49.5)
60-day	20.7 (18.6-23.0)	22.9 (20.6-25.5)	26.3 (23.5-29.3)	28.9 (25.7-32.4)	32.2 (27.3-37.0)	34.5 (28.6-40.4)	36.6 (29.2-44.2)	38.5 (29.2-48.1)	40.7 (29.6-52.6)	42.1 (29.8-56.1)

[1] Precipitation frequency (PF) estimates in this table are based on frequency analysis of partial duration series (PDS).

Numbers in parenthesis are PF estimates at lower and upper bounds of the 90% confidence interval. The probability that precipitation frequency estimates (for a given duration and average recurrence interval) will be greater than the upper bound (or less than the lower bound) is 5%. Estimates at upper bounds are not checked against probable maximum precipitation (PMP) estimates and may be higher than currently valid PMP values.

Please refer to NOAA Atlas 14 document for more information.

The City's Stormwater System was designed to handle a 10 year frequency, 5 day duration storm*

*5 day duration storms are no longer tracked

Hurricane Ian 9/28/22 delivered over 15 inches of rain in a 24 hour period

NOAA Rainfall Data Downloaded 9/4/24

5. Sarasota County and the city of North Port have adopted tighter stormwater standards. State agencies are debating making them more stringent by adopting current rainfall data.
6. Sarasota County Community Flood Hazard Area, using data up to 2020, has this site and the adjacent wetlands in Flood Zone AE

Given the information contained in this letter, the only conclusion that can be reached is that this stormwater system may very well be inadequate. **With no modifications to storage pond LL-7 and the wetland it drains into, and considering a functional wetland and existing retention pond will be filled and made**

impervious, how on earth can post-development runoff NOT be more than pre-development? We have experienced unprecedented rainfall in this area. If we experience rainfall amounts commensurate with a 1000-year storm, will this stormwater system be able to handle the volume and speed of the stormwater runoff? A stormwater engineer questions its ability to do so in her report. Additionally, other municipalities and state agencies have recognized the urgent need to avoid minimum standards and apply modern stormwater standards to development.

As far as the "Village at Laurel and Jacaranda" is concerned, Venice has an opportunity to do the right thing, in both instances, NOW! This can be accomplished by hiring an independent stormwater engineer to review the applicant's stormwater calculations and models, which have been called into question. In addition, the engineer can run models for ***at least*** a 100-year/24-hour event and preferably model a 500-year storm given what is at stake. Current rainfall amounts using NOAA Atlas-14 standards can be plugged in. If the proposed stormwater system is modeled using the above criteria and it performs well, case closed. Everyone sleeps well at night. If the stormwater system cannot handle the rate and volume of water similar to the types of storms we've experienced in the recent past, then it should be modified to do so.

The question that must be asked is given this information, is it prudent to approve this site plan without a thorough

analysis of its deficiencies? If the answer is yes, one must get comfortable with the idea that someday these decisions will have to be justified to a homeowner whose home just flooded or a person who lost a family member in a traffic accident. Passing the buck to an overburdened government agency or to the county will not suffice. The buck stops with this city council, and the decision is now yours.

Respectfully,

//signed// 7 April 2025

Kenneth Baron

209 Corelli Dr

443-867-4172