



City of Venice
Development Services Department

MEMORANDUM

To: City Council Members
Ed Lavalley, City Manager
David Persson, City Attorney
Lori Stelzer, City Clerk

From: Jeff Shrum, Development Services Director

Date: November 17, 2017

Re: Adoption Hearing: City of Venice 2017-2027 Comprehensive Plan

On September 29, 2017, the City transmitted Ordinance 2017-22, adopting on First Reading the City of Venice 2017-2027 Comprehensive Plan for transmittal to the Florida Department of Economic Opportunity (DEO). In response to the transmittal, State reviewing agencies issue a response commonly referred to as an Objections, Recommendations, and Comments (ORC) report. All of the agency responses (including those received from other local governments) have been included in the public record for your review. I have summarized the individual department comments below along with the staff response to those comments indicating 'proposed changes' to address the comments. The following ORC responses were received:

Florida Department of Economic Opportunity: DEO found "...no comments related to important state resources and facilities...". DEO goes on to indicate "We are, however, providing a technical assistance comment consistent with Section 163.3168(3) F.S. The technical assistance comment will not form the basis for a challenge." The comment is as follows:

The map (referring to the Future Land Use Map) should be revised to include the new planning horizon established by the comprehensive plan.

Proposed Response: Include the Planning Horizon years 2017 – 2027 on the Future Land Use Map Series.

Southwest Florida Water Management District (SWFMD): Planning and Utility staff along with our consultant Kimley-Horn & Associates had a conference call with the SWFMD reviewing staff (Mr. James Golden) on November 7, 2017 to discuss their comments. The following **(three comments)** are the comments from Mr. Golden along with the response from staff that was discussed for resolution to the comments. Note: Mr. Golden indicated the comments provided were not intended as basis for a challenge to the Plan adoption and he was accepting of the response / approach.

Regional Water Supply:

1. *Section 163.3177(6)(c)3, F.S., requires that local governments update their Ten- Year Water Supply Facility Work Plans (Work Plans) within 18 months of the local water management district's approval of its Regional Water Supply Plan (RWSP). The District last updated its RWSP in November of 2015; however, we have not received the City's Work Plan update. District staff is available to provide technical assistance in this effort.*

Proposed Response: Utilities staff has initiated an update to the Water Supply Plan anticipated to be completed in 6-8 months.

2. *The City's proposed potable water level of service (LOS) is 90 gallons per capita per day (gpcd). The City's current use, based on 2008-2013 Public Supply Annual Report (PSAR) data, is 65 gpcd. The District's preference is for a LOS that is more reflective of actual water use for the entire planning horizon.*

Proposed Response: Added a statement to page 167 of the Data, Inventory, and Analysis (DIA) as follows: "The update to the City's Water Supply Facilities Master Plan is required by this Element and the applicable Florida Statutes; re-evaluation of the LOS standard for potable water may be required upon an update to this Master Plan."

Floodplains and Floodprone Areas:

3. *The comprehensive plan should include strategies that address floodplain protection, as required by Section 163.3177(6)(d)1.b., F.S.*

Proposed Response: Upon review, our consultant has indicated it would be appropriate to add language to the Open Space Element similar to language from Sarasota County's Comprehensive Plan on this topic, as follows (new text is in underlined format):

Strategy OS 1.4.2 - Protection of Native Habitats and Natural Resources

The City shall protect significant native habitats through its Land Development Code and review process including the following:

1. Preserve existing native vegetation and natural areas including threatened native habitats
2. Encourage development forms that provide protection of significant native habitats such as clustered development and alternative roadway designs (i.e., reduced rights-of-way)
3. Development shall first avoid impact to significant native habitats
4. Mitigate adverse impacts whenever areas of native habitats are involved in the development of property
5. Require development to first impact lower quality habitats and resources before impacts to higher quality habitats and resources are considered and used
6. Native habitat shall be used whenever possible to fulfill open space requirements
7. Protect environmentally sensitive/significant areas (i.e., floodplain, watersheds, water recharge areas, etc.).

Strategy OS 1.4.5 – Floodplain and Flood Prone Areas

The City will not issue any development order which would permit unmitigated development in 100 year floodplains, as designated on Federal Emergency Management Agency Flood Insurance Rate Maps or adopted County flood studies,

or on floodplain associated soils, defined as Soils of Coastal Islands, Soils of the Hammocks, Soils of Depressions and Sloughs, and Soils of the Floodplains that would adversely affect the function of the floodplains or that would degrade the water quality of water bodies associated with said floodplains in violation of any local , State or federal regulation, including water quality regulations.

Southwest Florida Regional Planning Council (SWFRPC): No comments.

Proposed Response: No change.

The Office of Intergovernmental Programs of the Florida Department of Environmental Protection (Department): No comments.

Proposed Response: No change.

Sarasota County: No comments

Proposed Response: No change.

Based upon review of the ORC comments received from the State and local agencies, staff is recommending **Adoption with Changes (as indicated)** of the City of Venice 2017 – 2027 Comprehensive Plan.

Cc: Comprehensive Plan Update File