



# CITY OF VENICE

## DEVELOPMENT SERVICES DEPARTMENT

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September 29, 2017

Florida Department of Economic Opportunity  
Attn: Ray Eubanks, Plan Processing Administrator  
State Land Planning Agency  
Caldwell Building  
107 East Madison Street, MSC 160  
Tallahassee, FL 32399

**RE: Expedited Comprehensive Plan Amendment - City of Venice Comprehensive Plan 2017-2027**

Dear Mr. Eubanks:

The City of Venice, in accordance with the procedures for Expedited State Review, Florida Statutes (FS) Chapter 163.3184(3), is transmitting its "City of Venice Comprehensive Plan 2017-2027" replacing in its entirety, the previously adopted 2010 Comprehensive Plan. Enclosed with this letter are one (1) hard copy and two (2) electronic copies on a CD in a PDF format. In addition to the Proposed 2017 – 2027 Comprehensive Plan, which has significant changes to formatting, we are providing one (1) hard copy and two (2) electronic copies of the 2010 Comprehensive Plan shown in "strike through" format to clarify the City's intent to replace the current plan in its entirety. Along with this cover memo, the transmittal package includes a listing of all of the transmittal files found on the associated CD.

The Local Planning Agency held a duly advertised public hearing on May 3, 2017, at which time on a vote of 6-0 they recommended approval of the proposed amendments for transmittal to the City Council. The proposed Comprehensive Plan was heard by the City Council in transmittal hearings held on: June 12, 2017, June 23, 2017, August 30, 2017 and September 19, 2017. City Council, on a vote of 5-1, recommended for approval on first reading at the scheduled and advertised public transmittal hearing held on September 19, 2017. Pursuant to Florida Statutes (FS), Chapter 163.3184(3)(b), the proposed Comprehensive Plan amendments and related documentation is being transmitted to the State Land Planning Agency as well as the other required review agencies including: the Florida Department of Transportation, Florida Department of Education, Florida Department of State, Florida Department of Environmental Protection, Southwest Florida Regional Planning Council, Southwest Florida Water Management District, Sarasota County, and the School District of Sarasota County.

These amendments are not related to:

- an area of critical state concern pursuant to FS Chapter 380.05,
- a rural land stewardship area pursuant to FS Chapter 163.3248,
- a sector plan pursuant to FS Chapter 163.3245,
- a new plan for a newly incorporated municipality pursuant to FS Chapter 163.3167,
- an Evaluation and Appraisal Report (EAR) pursuant to FS Chapter 163.3191.



The proposed City of Venice 2017-2027 Comprehensive Plan replaces in its entirety the currently adopted 2010 Comprehensive Plan due to substantial formatting and structural changes to the document, including the replacement of the typical Goal, Objective, and Policy approach to a system of Vision, Intent, and Strategy statements. As this approach is significantly different than most Florida local governments, there was discussion about this during the public input process regarding this approach as well as informal discussion with the Florida Department of Economic Opportunity. The following highlight the important aspects of the proposed amendments to assist reviewers:

1. **2010 Plan Repealed (strikethrough format).** The 2010 Plan and related information is repealed in its entirety and replaced with the 2017 – 2027 Venice Comprehensive Plan. It is important to note that certain aspects of the 2010 Plan have been incorporated into the proposed 2017 – 2027 Plan including the entire Joint Planning Areas and Agreement with Sarasota County. Other aspects of the current plan have been carried forward and included in a “Transition Section (policies)” of the Land Use Element. Information specific to the amendment including reasons why the Plan has been proposed for change is provided on pages 7-9 (Introduction). Table I-1 Comprehensive Plan Review Summary provides a “snapshot” of the 2010 Element and its GOPs as they relate to changes in Growth Management / Florida Statutes, information deemed to be regulatory in nature, information that was noted as “inconsistent” with other provisions, required, subsequent studies that could not be achieved, requirements for Master Plans, undefined topics and GOPs which did not provide sufficient guidance to the City.
2. **GOP and VIS.** Goals, Objectives and Policies (GOP) are replaced by Vision, Intent and Strategies (VIS). The VIS format achieves the same as the GOPs; however, better reflects comments and direction by the Planning Commission, sitting as the Local Planning Agency (LPA), that this proposed Plan should be “visionary” in its approach and mission in providing guidance for decision makers and for the implementing regulations. The following information is noted within the Plan’s Introduction. “Vision, Intent and Strategies take the place of the traditional form of Goals, Objectives, and Policies; however, serve a similar purpose – to identify the broad-based goals of the City (Vision), what the City hopes to achieve (Intent), and how the City envisions achieving the Vision (Strategies). As used throughout the Comprehensive Plan, the following terms are generally (commonly) referred to by Chapter 163, F.S. as:
  - Vision = “Goal”; identified in the body of the Plan by “Vision” followed by the Element Identifier
  - Intent = “Objective”; identified in the body of the Plan by “Intent” followed by the Element Identifier
  - Strategy = “Policy”; identified in the body of the Plan by “Strategy” followed by the Element Identifier

Information in the proposed Comprehensive Plan is identified by a series of letters and numbers. Specifically, the first number represents the Vision number, the second represents the Intent number and the third number represents the Strategy number. For Example, Strategy LU – 1.1.1 means that the information presented is the first Strategy under the first Intent within the first Vision. Similarly, the Neighborhoods are coded by a two-letter identifier that is also provided in the information to further differentiate between City-wide information and Neighborhood specific information.

3. **Neighborhoods.** Planning Areas previously identified and adopted have been replaced by Neighborhoods. The City Council and the Planning Commission (LPA) desired to create a Plan that not only addressed the needs of the City as a whole but also provided area specific (additional) provisions for Neighborhoods. Neighborhoods were identified and analyzed based on their geographic location, composition, natural boundaries, and their “intent”. The previous



Planning Areas did not address the entire City and also did not provide clear, predictable standards and policies to guide land use, transportation, environmental considerations, etc. The Planning Areas also required significant, additional analysis and processes (i.e., future plans including small area plans) thereby replicating the Comprehensive Plan process subsequent to the adoption of that Plan.

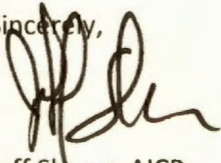
- a. Certain 'regulatory' standards within policies from the 2010 Plan were determined to more applicable/appropriate as Land Development and Zoning Code. Standards included but were not limited to parking ratios, setbacks, architectural standards, building heights and specific development standards.
4. **Future Land Use & Carrying Capacity.** The City's "Carrying Capacity" is identified in Data Inventory and Analysis and summarized on page 17 of the Comprehensive Plan (Background section). The City noted during the initial reviews that detailed land use analysis was not previously undertaken with the 2010 Plan and in order to identify the potential impacts of the 2010 Comprehensive Plan and the 2017-2027 Comprehensive Plan, a corresponding analysis was undertaken. The proposed Plan and its related strategies results in a more appropriate and realistic approach to the City's overall growth and development. **As amended, the proposed Plan would reduce the maximum number of residential units from 50,566 to 39,735, and reduce the maximum non-residential development square feet from 94,159,557 to 76,000,657.** Some level of reduction is attributable to clarification in the previous Plan's language which allowed for the "double counting" of acreage for both residential and non-residential development as well as better reflecting the desires of the community.
5. **Peril of Flood.** Peril of Flood is addressed within the proposed Plan in both the Land Use and Open Space Elements. Specifically, the Land Use Element includes a section identified as "Coastal Management" including Vision LU 3 and related Strategies LU 3.1.1 through LU 3.1.5. The Open Space Element includes not only conservation related measures but also includes additional information, some similar, within Intent OS 1.9 Coastal High Hazard Area (CHHA) development and related Strategies OS 1.9.1 through OS 1.9.10. A copy of the CHHA Map is provided as Map LU-11 and LU-12 (CHHA with corresponding Land Use designations), and Map OS-1 and OS-2. Furthermore, where a CHHA is identified within the respective Neighborhood, the Neighborhood Map Series includes maps identifying the CHHA and Future Land uses.
6. **Transitional Language.** Transitional Language is provided within the proposed Comprehensive Plan to address and provide assurances that certain information deemed necessary by the City was in fact retained until such time as the City's Land Development and Zoning Code are formally amended. It is understood that upon the update of the City's Code, the City would then process a subsequent Comprehensive Plan amendment removing items determined at that time to no longer be needed or relevant. Vision LU 4 and its related Intent and Strategies provide the information deemed necessary in, at a minimum, the interim until the Code is amended. This includes language regarding Land Use Compatibility and Site Plan Design and Architectural Review.
7. **Review Matrix.** Based on the nature of the proposed Plan, a review matrix is provided (digital format only due to the size of the review matrix itself), that identifies the respective Florida Statutes requirement with the proposed VIS. Each VIS is identified as compared to the provisions of F.S. Chapter 163.31.
8. **JPA/ILSBA.** The Joint Planning Agreement and Interlocal Service Boundary Agreement (JPA/ILSBA) with Sarasota County is identified and provided in Intent 5.1. There are no portions of the current JPA/ILSBA that are being amended with this proposed Comprehensive Plan.
9. **Hurricanes including Evacuation.** Similar to recent discussions by Sarasota County and due to Hurricane Irma, the City will continue to work with Sarasota County, analyze hurricane

evacuation data and information, and update the Comprehensive Plan accordingly. Sarasota County is the primary provider of shelter space within the community. This section of the proposed plan will likely be amended as discussions with Sarasota County and surrounding municipalities commence to address appropriate changes as a result of Hurricane Irma.

10. **Intergovernmental Coordination.** The LPA proposed incorporating the specific intergovernmental coordination requirements within the respective Element. This proposal follows similar proposals by the LPA to provide like type information within the Element. While a formal, separate Intergovernmental Coordination Element (ICE) is not provided, all of the coordination measures and standards are provided in each Element

For additional information or clarification regarding this transmittal, please contact Mr. Jeff Shrum, AICP, Development Services Director, City of Venice, 401 West Venice Avenue, Venice, FL 34285 (941) 882-7431, or email at [jshrum@venicegov.com](mailto:jshrum@venicegov.com).

Sincerely,



Jeff Shrum, AICP  
Director of Development Services Director

cc: Department of Economic Opportunity, Bureau of Comprehensive Planning  
Department of Education  
Department of Environmental Protection  
Department of State  
Department of Transportation, District One  
Southwest Florida Regional Planning Council  
Southwest Florida Water Management District  
Sarasota County Planning Department  
Sarasota County School Board