

# MANATEE COUNTY GOVERNMENT

## AGENDA MEMORANDUM

69

<b>SUBJECT</b>	Proposed City of Bradenton Comprehensive Plan amendments for Riverdale	<b>TYPE AGENDA ITEM</b>	Report
<b>DATE REQUESTED</b>	July 24, 2001	<b>DATE SUBMITTED/REVISED</b>	July 18, 2001
<b>BRIEFINGS?/WHO?</b>	Memo to BCC on May 30, 2001	<b>CONSEQUENCES IF DEFERRED</b>	Miss comment period to Florida Department of Community Affairs, comments due 7/31/01.
<b>DEPARTMENT/DIVISION</b>	Planning Department Comprehensive Planning Division	<b>AUTHORIZED BY TITLE</b>	Carol B. Clarke, AICP Planning Director <span style="float: right;"><i>CBC</i></span>
<b>CONTACT PERSON TELEPHONE/EXTENSION</b>	Michael R. Wood, AICP Comprehensive Planning Administrator Ext 6831	<b>PRESENTER/TITLE TELEPHONE/EXTENSION</b>	Michael R. Wood, AICP Comprehensive Planning Administrator Ext. 6831

**ADMINISTRATIVE APPROVAL**

*DR for E Padgett 7/18/01*

**ACTION DESIRED**

INDICATE WHETHER "REPORT or "DISCUSSION, "FORM OF MOTION, or "OTHER ACTION REQUIRED:

**Provide report to the Board of County Commissioners regarding the proposed City of Bradenton Comprehensive Plan amendment for Riverdale.**

**ENABLING/REGULATING AUTHORITY**

Federal/State law(s), administrative ruling(s), Manatee County Comp Plan/Land Development Code, ordinances, resolutions, policy.)

Manatee County Comprehensive Plan Policy 11.1.5.2

**BACKGROUND/DISCUSSION**

- On June 13, 2001 the Bradenton City Council transmitted a second cycle of plan amendments to the Florida Department of Community Affairs for review. **APPROVED IN OPEN SESSION**
- The DCA requires all commenting agencies to provide input by July 31, 2001. JUL 24 2001
- Of primary interest to Manatee County in this cycle of amendments is the recently announced **BOARD OF COUNTY COMMISSIONERS  
-  
MANATEE COUNTY, FLORIDA**
- The City proposes to place a future land use designation of Res - 10 (Residential 10 du/ga) on the property.
- The existing County designation is Res - 6 (Residential 6 du/ga). The property is also part of the Coastal Storm Vulnerability Area Overlay (CSVA), the Coastal Evacuation Area Overlay (CEA), and the Coastal Planning Area (CPA).
- The County Comprehensive Plan would prohibit a future land use designation of Res-10, as this would be increasing residential density within the CEA. Policy 2.2.2.4.5 prohibits a future land use map amendment within the CEA which would increase residential density.
- The City indicates they will be zoning the property R-1B which will limit the density to about 4 du/ga. The City also indicates that the annexation approval was stipulated so that the single family lot area be a minimum of 7,500 sq. ft. or greater.
- If the Board wishes to provide comment to the DCA, the appropriate action would be to authorize the Chairman to sign a letter outlining concerns / issues as discussed in the May 30, 2001 (attached) Memorandum from Carol Clarke to the Board in this memorandum.

**HAS COUNTY ATTORNEY REVIEW BEEN REQUESTED?** Indicate "NO" or "YES" @ right.

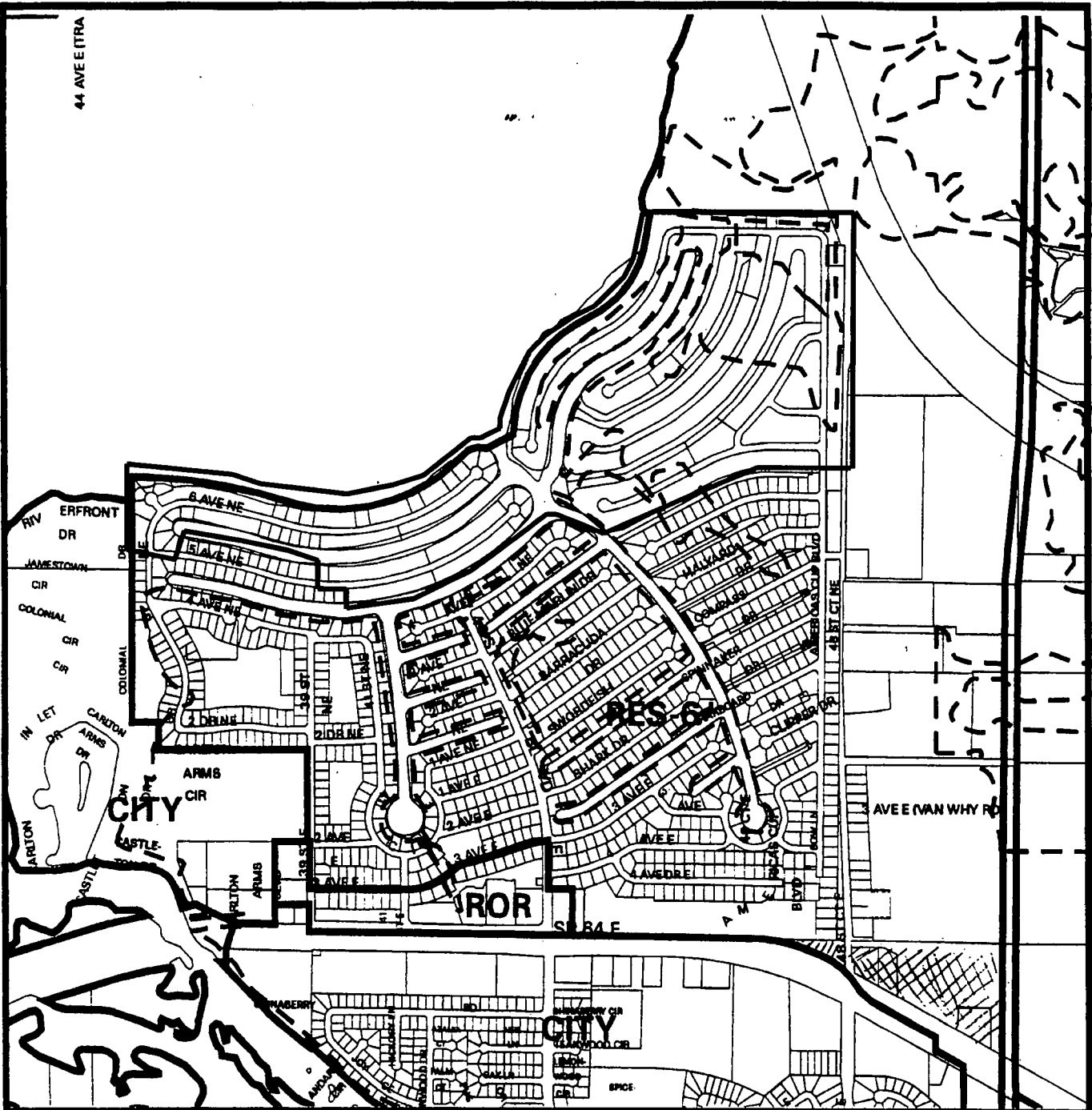
NO

If "NO," proceed to 1A/1B below. If "YES," proceed to 2A/2B below

**BC20010724DOC096**

- 1) IF "NO" TO ABOVE,
- A) PLEASE EXPLAIN BELOW: (see also following section 1B re: contract, agreement, lease, etc.)
- Legal review is not required at this time.
- B) IF A CONTRACT, AGREEMENT, LEASE OR OTHER DOCUMENT WAS PREVIOUSLY APPROVED, STATE YEAR OF LAST USE @ RIGHT:
- 2) IF "YES" TO FIRST QUESTION IN THIS SECTION,
- A) HAS ENTIRE MATTER, OR ONLY A PORTION, BEEN REVIEWED? IF ONLY A PORTION, WHICH PORTION?
- B) HAVE ALL COMMENTS/SUGGESTIONS RAISED BY COUNTY ATTORNEY BEEN ADDRESSED/INCORPORATED; IF NOT, PLEASE EXPLAIN. A COPY OF FINAL COUNTY ATTORNEY MEMO RE THIS MATTER MUST BE ATTACHED (If comments were verbal, so indicate.)

<p><b>ATTACHMENTS: (List in order as attached)</b></p> <p>Future Land Use Map                  Zoning Map                  May 30, 2001 Memorandum to the BCC from Ms. Clarke                  May 24, 2001 Memorandum to the City Council from Ms. Seewer                  City of Bradenton Riverdale plan amendment staff report</p>	<p><b>INSTRUCTIONS TO BOARD RECORDS:</b></p>
<p><b>COST</b></p>	<p><b>SOURCE (ACCT# &amp; NAME)</b></p>
<p><b>COMMENTS</b></p>	<p><b>AMT./FREQ. OF RECURRING COSTS (ATTACH FISCAL IMPACT STATEMENT)</b></p>



**Project Number:** RIVERDALE  
**Proposed Use:**  
**Proposed FLUC:**  
**Existing Zoning:**  
**Existing FLUC:** RES-6  
**Flood Zone:** X8  
**Floodway:**  
**Acraege:**  
**Drainage Basin:** LOWER MANATEE DIR.  
**Commissioner:** Jonathan Bruce  
**Map Prepared:** October 18, 2000  
**Requested By:**  
**Section: 28 Township: S4 Range: 18**

**Tax I.D.:** 112391000  
**ANNEXATION AREA**

**Manatee County  
 Future Land Use  
 Staff Report Map**  
**1 Inch = 1020'**

**Overlays:**  
**ST, AI, HA, WR, RV:** NONE  
**Watershed:** NONE  
**Coastal Hazard:** NO

 **Coastal High Hazard Line**



## MEMORANDUM

**Date:** May 30, 2001

**To:** Manatee County Board of County Commissioners

**Through:** Ernie Padgett,  
County Administrator *E Padgett 6/4*

**From:** Carol B. Clarke, AICP *Carol B. Clarke  
for CBL*  
Planning Director

**Re:** RIVERDALE - PROPOSED VACATION AND COMPREHENSIVE  
PLAN AMENDMENT

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On June 13, 2001 the City Council of Bradenton is scheduled to hear development request regarding the recently annexed Riverdale property. These request include the vacation of rights-of-way known as Sardine Court and the north portion of River Pointe Drive North, along with a comprehensive plan map amendment to a Residential-10 future land use category.

### COMPREHENSIVE PLAN AMENDMENT

The Manatee County future land use category for this property is Res-6 (6 dwelling units per acre) including the CEA (Coastal Evacuation Area) overlay and the CPA (Coastal Planning Area) overlay. The City proposes a future land category of Res-10 (Residential 10 dwelling units per acre). The City does not have coastal overlays similar to Manatee County.

Please see the attached development application which provides a comparison of the City's and County's Comprehensive Plans .

The primary contention for consistency between the two plans is predicated on the following. The City has only three residential future land use classifications Res-3, Res-10, and Res-15. The application states that while the change in future land use category may appear to be an increase in density, from Res-6 in the County to Res-10 in the City, the annexation ordinance limits development of this property to single family detached dwellings with a density level no greater than the R-1B City zoning standards. The R-1B standard requires 7,500 sq. ft. minimum lot area as compared to the existing RSF-4.5 county zoning designation which requires 7,000 sq. ft. The developer contends that this will result in density less than the actual platted density, as the proposed lot sizes will be larger.

## RIGHT OF WAY VACATION REQUEST


Nordic of Florida Development, Inc. proposes to vacate River Pointe Drive and Sardine Court. They propose to relocate and re-dedicate right-of-way in order to avoid impacting wetlands. The proposal would eliminate a substantial number of lots while leaving the northern tier of lots intact. The vacation request would not require re-subdivision under the Manatee County Land Development Code. The lots are considered Lots of Record under both the Comprehensive Plan and Land Development Code and have Special Exemption status under the Comprehensive Plan. The proposed vacation request will decrease the number of homes that could be built while minimizing impacts to wetlands.

JAS/mar

Attachments: Exhibit A  
Exhibit B  
Exhibit C  
Exhibit D  
Exhibit E (Part of)  
Exhibit E (Part of)

MEMORANDUM

TO: MAYOR AND CITY COUNCIL

FROM: RUTH SEEWER, PLANNING 

RE: M-CPA-01-06 STEPHEN THOMPSON/NORDIC

M-CPA-01-07 STEPHEN THOMPSON/PERICO HARBOR MARINA AND  
WALID SABA

M-CPA-01-08 CITY OF BRADENTON

DATE: MAY 24, 2001

Attached is information pertaining to the above referenced comprehensive plan amendments proposed for the city's second cycle of 2001. The first two have been submitted by private parties, and the third is proposed by the City. They will each need to be reviewed, and action must be taken on an individual bases. Following is a synopsis of the amendments.

**M-CPA-01-06 NORDIC**

This amendment is being requested as a result of the annexation of the Riverdale property in east Bradenton. The area consists of 158.1 acres, a small portion of which are canals. The County Future Land Use category is Res-6, allowing up to 6 units per acre. The County zoning is Res 4.5. The City is proposing a Future Land Use designation of Residential\10, which would allow up to 10 units per acre, however, we will be designating a zoning of R-1B, which would limit density to about four units per acre. Note that a stipulation of the annexation approval was that the developer maintain lot areas equivalent to or exceeding the R-1B standards for the City. This is an existing single family subdivision, and will be developed as such.

All maps within the plan have been revised and updated to include this land area. Charts and tables have also been amended accordingly. Wetland areas are included as conservation on the Future Land Use Map, recreation\open space on the Existing Land Use map, and also indicated on the Wetlands Map. This information was based on a survey presented to the department by Global Surveying Inc.

I have included an impact analysis and comprehensive plan comparison for your review.

**M-CPA-01-07 PERICO HARBOR MARINA & WALID SABA**

This is another amendment made necessary by the annexation of land into the City limits. The area consists of approximately 14 acres, including submerged lands. The County designation is Res 3, a residential designation allowing residential development of up to 3 units per acre as well as convenience stores and recreational facilities. Due to the existing development of the marina and convenience store, we are electing to designate the property as commercial.

Again, all maps have been updated to include this area. Note that the submerged lands have not been included in either the existing land use or future land use calculations. We have included the wetlands as conservation area on both the above mentioned maps and the Wetlands Map located in the Plan.

The impact analysis and comprehensive plan comparison is included for your review of this amendment.

#### **M-CPA-01-07 CITY OF BRADENTON**

A recent review of the Plan indicated some changes were necessary to ensure the Plan was compatible throughout based on the data used for the City's Ear based amendments. We have included these changes in this amendment along with an explanation as to why the change is necessary. Additionally, we have revised the upland area for Pine Island based on a survey. The prior designation was inaccurate because a survey had never been done on the property, and the uplands area was only estimated.

Listed below are the pages designated for changes and a description of each change.

100:1 – The City actually comprises 1.8% of the County's land area. We have revised this to "less than 2%" to avoid changing this in the future, since it is such an insignificant percentage.

100:3 – We have removed the "S" from the source listed on the bottom of Table 1-1. The information used was the US Shimberg Data.

100:4 – Table 1-2 includes several changes. Most significant is the inclusion of seasonal population. The seasonal population increase was 14.7% based on the seasonal calculations in the Housing Element. The Comprehensive Plan adopted in 1989 indicated the seasonal population to be approximately 13%. Information again is based on UF Shimberg Data, and not USF.

100:7 – We have removed the non-white age distribution statistics from Table 1-3. This table is based on the 1990 census, therefore we have removed the source indicated as USF Shimberg Data.

100:9 Adjusts the changes in the undeveloped acreage for the city.

100:10 – The first paragraph has been changed because the definition of Coastal High Hazard Area is all land below 8 feet, and this pertains to land below 2 feet in elevation. Under the section titled "accommodation of projected populations" we have revised the numbers to coincide with those in the Housing Element. These calculations were submitted by Bill Brisson of Adley, Brisson and Engman.

100:13 – summarizes the Future Land Use acreage/density and intensity. Changes in figures were made according to actual acreage, and we included coverage for residential properties as 30% for 3 units per acre, 50% for 10 units per acre, and 70% for 15 units per acre. Commercial uses are restricted by the floor area ratio. We also have changed the current population estimate to 48,011 to be consistent with the housing element.



100:14 – Summarizes all the existing land uses by neighborhood. The changes are based on the adjustments noted below.

100:51 – corrects a scrivners error.

100:82 – Adjusts the land use data table to include the area of Perico that was recently annexed into the City.

100:90 – This land use data table has been revised to include the Riverdale property and to make the property adjustments in the vacant and commercial areas east of 48<sup>th</sup> Street Court East based on the survey and subsequent construction of the Rivers Edge Shopping Center.

100:93 –This land use data table has been adjusted to include the revised Pine Island land calculations based on a survey, to include all the smaller mangrove islands in the river in our recreation\open space category, and to indicate the areas that have been developed along State Road 64 East as commercial rather than vacant. This includes the Lakeside Office Park and the Braden River Business Center.

500:1 – We have changed the land use percentages in accordance with the percentages calculated in the Future Land Use Element.

500:3 – Under the table indicating “Flow Projections”, we have changed the 2010 population estimates to coincide with the population projections of Shimberg used throughout the plan.

500:4 - We have changed the land use percentages in accordance with the percentages calculated in the Future Land Use Element.

500:12 - We have changed the land use percentages in accordance with the percentages calculated in the Future Land Use Element.

The Planning Commission has recommended approval of these amendments.

CITY OF BRADENTON  
2001 MAY 11 PM 2 53  
PLANNING & DEVELOPMENT

May 11, 2001

Ms. Ruth Seewer  
City of Bradenton  
Caller Service 25015  
Bradenton, Florida 34206-5015

**Subject: Riverdale Revised - Comprehensive Plan Amendment (Residential Subdivision)**

Dear Ruth:

Pursuant to the application requirements for a Comprehensive Plan Amendment, we are hereby providing an Impact Analysis for the above-referenced project in support of an annexation request to include the subject property into the City of Bradenton.

GENERAL LOCATION

The subject vacant property is generally located east of 41<sup>st</sup> Street East, north of SR 64, south of Manatee River and west of 48<sup>th</sup> Street East in unincorporated Manatee County. Nordic of Florida has sufficient properties within these street boundaries to accommodate an expansion of the existing Riverdale Subdivision which is located directly to the south and east of the subject property for which an annexation request is made.

GENERAL INFORMATION - SURROUNDING PROPERTIES

North	Manatee River
South	Zoned – RSF-4.5 County (Residential Single Family), FLUC - RES-6 Land Use, Residential Single Family – Unincorp. Manatee County
East	Zoned: RSF (Single Family), FLUC – RES-6 Land Use: Residential Single Family, Unincorp. Manatee County
West	Zoned: PDP, FLUC – RES-15 Land Use: Residential Multi Family – City of Bradenton

## SITE CHARACTERISTICS

### Surrounding Land Use

The subject property is currently undeveloped raw land with previously excavated finger canals connected to the main canal and the Manatee River.

Nordic of Florida owns the land located directly to the south and those lands are currently used for residential purposes. Located directly to the east of the subject site is 48<sup>th</sup> Street East and the east side of this street is sparsely developed with single family houses.

### Access

The subject property currently has access to SR 64 via 41<sup>st</sup> Street East, 43<sup>rd</sup> Street East and America's Cup Blvd., as the area is in an existing platted residential area.

### Natural Resources

The subject property has existing mature oak trees located throughout the site. These trees, where possible, will remain and be used within the lot area to provide shade on the various lots within the proposed project. There are salt water wetlands which will be moved and enhanced within the project boundaries subject to agency permitting. There are no known historical resources located on this site.

There are also no known species listed by Federal, State or Local agencies as endangered, threatened or species of special concern on this site due to its present level of development and the level of development on surrounding sites and a check with the appropriate agencies.

### Flood Plains

The subject property lies with Flood Zone A8 as shown on FEMA Map Number 120153 0194C which means the first living floor of each residential structure must be located no lower than eight (8) feet above sea level.

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## AVAILABLE SERVICES/CONCURRENCY

### Water and Sewer

The City of Bradenton will serve the area with potable water distribution and sewage collection lines. The City currently has adequate capacity to provide water service and sewage disposal for the proposed residential development. The acceptable utility level of service (LOS) for the City of Bradenton and Manatee County are as follows:

	City of Bradenton	Manatee County
Sanitary Sewer	110 gal/person/day	115 gal/capita/day
Potable water	125 gal/person/day	110 gal/capita/day
Solid waste	35 lbs/capita/wk	7.1 lbs/capita/day

### Solid Waste

Solid waste collection will be provided by the City of Bradenton. The Manatee County Landfill has sufficient capacity to meet the needs of this property. Whether this property is in the county or the city, all solid waste is disposed in the County Landfill. The City also has a significant recycling and reuse program in place to reduce solid waste leaving the site.

### Emergency Services

The subject area will be served by the City of Bradenton Police, Fire and Emergency Services. All of these services have confirmed that they can provide adequate services and facilities to protect and serve this annexed property.

### Transportation

The site location has direct access to SR 64, an arterial facility, to the south via local roads within the Riverdale subdivision. As the subdivision was platted in the late 1950's, it is not anticipated that the build-out of the subdivision will create any changes to current levels of service on either the local roads or SR 64. The City of Bradenton's Comprehensive Plan identifies the road segment of SR 64 East from the east city limit line to Carlton Arms Apartments as having a Level of Service (LOS) "E". Manatee County identifies the road segment from the Braden River to I-75 as having an LOS "D" in its Comprehensive Plan. Since the subject property was previously platted, it is vested for concurrency and with a recombination of lots, there are fewer lots than the number originally platted. This project has vested rights and is not required to receive a Level of Service Certificate from Manatee County.

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**Riverdale Subdivision Annexation  
Comparison of the Comprehensive Plans of  
Manatee County and the City of Bradenton**

In order to satisfy the requirements of the City of Bradenton and the Department of Community Affairs (DCA) with regard to the Riverdale Subdivision annexation, George F. Young, Inc. offers you the following analysis and comparison of the future land use, coastal, and intergovernmental coordination elements of the Comprehensive Plans of Manatee County and the City of Bradenton, as they relate to the subject property.

**Future Land Use Element and Density**

Prior to the annexation of the subject property (158.1 acres) by the City of Bradenton, at the request of Nordic of Florida Development, Inc., the subject property was zoned RSF-4.5/CH by Manatee County under its future land use category of RES-6. The intention of Manatee County's RES-6 future land use category is to provide low density urban or clustered low to moderate density urban residential uses in established areas. The maximum allowable gross residential density is 6 dwelling units per acre.

Upon annexation approval of the subject property, the City of Bradenton required a Comprehensive Plan Amendment to establish a future land use category (FLUC) for the subject. Objective #1, Policy #6 of the City's Future Land Use Element of the Comprehensive Plan states that land annexed into the City is to be assigned a future land use category consistent with all policies and appropriate neighborhood recommendations of the Comprehensive Plan and adjacent land use categories. Objective #7 states: "Consistency of the City's land use policies with state and regional plans, and to the extent possible with those of the County and adjacent communities."

The RES-6 (6 units per acre) FLUC in Manatee County does not easily translate into FLUC in the City of Bradenton, which has only three density categories: 3 (very low density), 10 (moderate density) and 15 units per acre (high density). As this project is already platted, a future land use category of Residential-10 units per acre provides consistency "to the extent possible" with Manatee County, as well as maintaining the intention of the developer. This is also consistent with the definition of RES-6 in the County's Comprehensive Plan as having the intention to provide low density urban or clustered low to moderate density urban residential uses in established areas. While it may appear that an increase in density is being allowed, the annexation ordinance limits development of this

property to single family detached dwellings with a density level no greater than R-1B zoning standards. The proposed density will actually be less than the platted density, as proposed lot sizes will be larger. If the City and County had similar density categories, the property would have been classified under the similar future land use category.

The Implementation Mechanism for Policy 2.1.2.5 of the Manatee County Comprehensive Plan Future Land Use Element permits the consideration of new residential development in undeveloped areas that are suitable for new residential use and the designation of the maximum allowable residential densities, encouraging the transition of densities. With a Residential-10 future land use category, the subject would provide this transition between Carlton Arms to the west (Residential-15), Riverdale to the south and east (RES-6), and as yet undeveloped unincorporated land to the east also designated RES-6.

### **Coastal Element**

Both the City and County have limits in place on residential development in low-lying areas. The City limits residential development to low density below the 8 foot contour line (Objective #5, Policy #1 Coastal Management Element). The Future Land Use Element of the Manatee County Comprehensive Plan identifies the subject property as lying in the CSVA (Coastal Storm Vulnerability Area), which is defined as that area which lies seaward of the 5 foot contour line (Policy 2.2.2.5.1). One of the primary purposes of the CSVA, according to Policy 2.2.2.5.2, is to limit the population, infrastructure, and development activity along coastal areas. The County also identifies this property as lying in the CEA (Coastal Evacuation Area) overlay district as well (Policy 2.2.2.4), which corresponds to the coastal high hazard area established by the City. The restrictions imposed by both the CEA and coastal high hazard area are similar to those of the CSVA. Objective # 3, Policy #3 of the City's Comprehensive Plan states that to maintain coordination between the City and County policies regarding land use and development along City/County fringe areas and in hurricane evacuation zones must be coordinated to ensure compatibility between the two governments.

Goal #6 of the City's Comprehensive Plan emphasizes the need for rapid evacuation prior to hurricanes. Policies # 1 and 4 indicate the City's commitment to cooperation and participation in Manatee County's evacuation planning and requiring the submittal of hurricane evacuation plans for new residential developments in high priority evacuation areas to Manatee County Division of Emergency Management. The Manatee County Comprehensive Plan also has

policies under Objective 4.4.2 requiring hurricane evacuation plans of new developments located in the Coastal Planning Area.

### **Intergovernmental Coordination Element**

Policy #1 of the Intergovernmental Coordination Element of the City of Bradenton's Comprehensive Plan states that to ensure consistency, coordination between the City and Manatee County's Comprehensive Plan is necessary through mutual review and criticism. By law, Manatee County reviews all amendments to the City of Bradenton's Comprehensive Plan. Therefore, all policies and objectives of the City of Bradenton's Comprehensive Plan should be consistent with those of Manatee County's Comprehensive Plan. The City of Bradenton Comprehensive Plan Intergovernmental Coordination Element, Objective #3, Policy #8 states: "Amendments to the City's Comprehensive Plan to address annexed property shall be compatible with Manatee County's Comprehensive Plan in regard to density and intensity limits and level of service standards."

Manatee County's Comprehensive Plan echoes a similar policy in Policy 11.1.2.1 of the Intergovernmental Coordination Element: "Attempt to negotiate interlocal agreements with the City of Bradenton...regarding annexation of any area within Manatee County. The interlocal agreement sought by Manatee County shall ensure consistency with this Comprehensive Plan including consistent level of service standards, designation of the annexation area on the Future Land Use Map of the municipality in a manner consistent with the Future Land Use Map in this Comprehensive Plan, and ensure compatibility of land uses in other areas."

### **Concurrency**

As stated in Objective 11.1.2, Manatee County allows annexations that maintain consistency with the Comprehensive Plan. Conversely, Manatee County objects to any proposed annexations that have a "significant adverse impact" (GFY quotes) on the County's infrastructure and facilities or are inconsistent with the Comprehensive Plan unless mitigation measures are taken (Policy 11.1.2.2).

Objective #2 of the Future Land Use Element of the City of Bradenton Comprehensive Plan states: "Timing of development to ensure the provision of adequate utilities and roadways." Since the number of proposed single family lots will be reduced from what was approved by Manatee County, the impact on roads and utilities will also be reduced. Objective #8, Policy #2 of the City's Comprehensive Plan encourages the annexation of property where it promotes efficiency of utilities and roadways.

The City of Bradenton Comprehensive Plan identifies the road segment of SR 64 East from the east City limits to Carlton Arms Blvd. as having an LOS "E". Manatee County identifies the road segment from the Braden River to I-75 as having an LOS "D" in the Comprehensive Plan.

The acceptable level of service (LOS) standards for utilities, as indicated in the City of Bradenton's Comprehensive Plan Capital Improvement Element and in the Manatee County Comprehensive Plan Wastewater Treatment Sub-Element, Solid Waste Sub-Element, and Water Supply Sub-Element, are as follows:

	City of Bradenton	Manatee County
Sanitary Sewer	110 gal/person/day	115 gal/capita/day
Potable Water	125 gal./person/day	110 gal/capita/day
Solid Waste	35 lbs./capita/wk	7.1 lbs./capita/day

### **Conclusion**

In conclusion, the City of Bradenton and Manatee County have similar policies in their respective comprehensive plans, with regards to limits on density and development and coordination with each other to maintain consistency. Although the City future land use category of Residential-10 indicates greater density than the Manatee County future land use category of RES-6, the developer intends to reduce the already low density of the existing plat by combining single family lots and increasing lot sizes. The density is also limited by the annexation ordinance to a level no greater than that allowed by R-1B zoning district standards.



July 24, 2001

**DRAFT**

Florida Department of Community Affairs  
Ray Eubanks, Community Program Administrator  
2555 Shumard Oak Boulevard  
Tallahassee, FL 32399

Re: Proposed City of Bradenton Comprehensive Plan Amendments DCA Ref # 01-2

Dear Mr. Eubanks:

Manatee County offers the following comments regarding the City of Bradenton's plan amendment for the recently annexed Riverdale property. Manatee County is continuing to pursue a challenge to this annexation.

The City has proposed to amend the property into their Comprehensive Plan with a future land use category of Res-10 (Residential 10 du/ga). Manatee County believes this is an inappropriate category due to the increase in density.

The existing future land use category in the Manatee County Comprehensive Plan is Res-6 (Residential 6 du/ga). This area is also within the Coastal Storm Vulnerability Area Overlay (CSVA), the Coastal Evacuation Area Overlay (CEA), and the Coastal Planning Area.

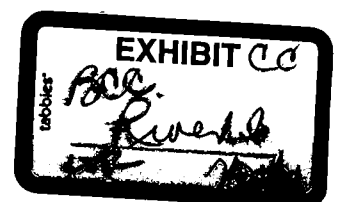
The Manatee County Comprehensive Plan Policy 2.2.2.4.5 prohibits an increase in residential density on the Future Land Use Map within the Coastal Evacuation Area. This policy was added to the County's Comprehensive Plan with the Evaluation and Appraisal Report amendments in 1998. That specific policy was added at the direction of the Department.

The materials provided by the City of Bradenton, reference that the annexation ordinance adopted by the City was stipulated in such a manner to limit the density to approximately four dwelling units per gross acre. County staff review of this ordinance only finds reference to the housing unit type being limited to single family.

Manatee County recommends that a future land use designation more consistent with 4 du/ga would be a more appropriate category, especially when considering the elimination of the overlay districts.

If there are additional question regarding these comments, please contact the Planning Director Carol B..Clarke, AICP at 941-749-3070.

Respectfully,



Florida Department of Community Affairs  
July 24, 2001  
Page two

*Manatee*

Manatee County recommends that a future land use designation more consistent with 4 du/ga would be a more appropriate category, especially when considering the elimination of the overlay districts.

Your consideration is greatly appreciated. If there are additional question regarding these comments, please contact the Planning Director, Carol B. Clarke, AICP at 941-749-3070.

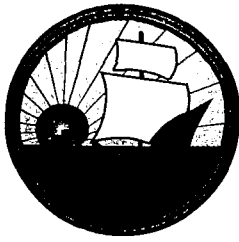
Sincerely,

BOARD OF COUNTY COMMISSIONERS  
MANATEE COUNTY, FLORIDA

JOE McCLASH  
Chairman

JM:MW:fl

cc: Mayor Poston  
City Council  
Jerry West  
Ken Keating  
Stephen Thompson



# MANATEE COUNTY

BOARD OF COUNTY COMMISSIONERS

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July 24, 2001

Florida Department of Community Affairs  
Ray Eubanks, Community Program Administrator  
2555 Shumard Oak Boulevard  
Tallahassee, FL 32399

**Re: Proposed City of Bradenton Comprehensive Plan Amendments DCA Ref # 01-2**

Dear Mr. Eubanks:

Manatee County offers the following comments regarding the City of Bradenton's plan amendment for the recently annexed Riverdale property. As you may know, Manatee County is continuing to pursue a challenge to this annexation.

The City has proposed to amend the property into their Comprehensive Plan with a future land use category of Res-10 (Residential 10 du/ga). Manatee County believes this is an inappropriate category due to the potential increase in density.

The existing future land use category in the Manatee County Comprehensive Plan is Res-6 (Residential 6 du/ga). This area is also within the Coastal Storm Vulnerability Area Overlay (CSVA), the Coastal Evacuation Area Overlay (CEA), and the Coastal Planning Area.

The Manatee County Comprehensive Plan Policy 2.2.2.4.5 prohibits an increase in residential density on the Future Land Use Map within the Coastal Evacuation Area. This policy was added to the County's Comprehensive Plan with the Evaluation and Appraisal Report amendments in 1998, at the direction of the Department of Community Affairs.

While the materials provided by the City of Bradenton indicate that the annexation ordinance adopted by the City was stipulated in such a manner to limit the density to approximately four dwelling units per gross acre, County staff review of this ordinance only finds reference to the housing unit type being limited to single family.

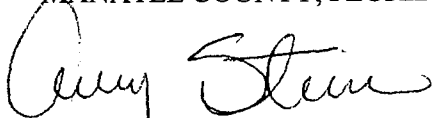
Florida Department of Community Affairs  
July 24, 2001  
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Manatee County recommends that a future land use designation more consistent with 4 du/ga would be a more appropriate category, especially when considering the elimination of the overlay districts.

Your consideration is greatly appreciated. If there are additional question regarding these comments, please contact the Planning Director, Carol B. Clarke, AICP at 941-749-3070.

Sincerely,

BOARD OF COUNTY COMMISSIONERS  
MANATEE COUNTY, FLORIDA



AMY STEIN  
1<sup>st</sup> Vice-Chairman

JM:MW:fl

cc: Mayor Poston  
City Council  
Jerry West  
Ken Keating  
Stephen Thompson