

**COMMENTS SUBMITTED
BY THE PUBLIC ON THE
FISCAL NEUTRALITY METHODOLOGY DEVELOPMENT
LAST UPDATED
May 21, 2015**

Submit comments via the [Sarasota 2050 Evaluation](#) web page
Comments posted within two working days.

Date Received Name Representation email	Comments received in response to the following request: Please review the latest information on developing a clear and transparent methodology for determining Fiscal Neutrality on 2050 developments and share your thoughts in the box below (Latest information is within Category: 04/ Fiscal Neutrality Methodology).
<p>5/21/2015 Vicki Nighswander MAT, MPH Nighswan1@gmail.com</p>	<p>Rather than to spend hours mulling over the particulars of the revised report, I have some questions:</p> <ol style="list-style-type: none"> 1. It's all fine and dandy to look at the historical methodologies and the tried and true but where are the strategies that deal with new variables as we are being hit with right now? I'm talking about the consequences of growth variables. That should be a whole section or this old methodology doesn't meet the dynamic need. Yes, for example, if a new development that will have 5000 people and 2,500 cars doesn't impact on an already defined and growing dangerous intersection within a mile of the new development, I strongly believe the developers should pay something to make the intersection safer and not add to the further crashes and congestion. How can the new methodology deal with such a scenario? The impact of growth on University was predicable but the planning and approval process wasn't geared toward bringing the players on board to deal with prevention. There are ways to make this a win win but I don't see it with the continued old methodologies that don't bring in dynamic growth variables and their consequences. 2. I do feel as a prevention variable, access to care should be addressed with each new building and development approval process. I know that care facilities do their own strategic planning but there should be at minimal a noted communication. I will not be attending the planning meeting tonight but please incorporate my comments. And hopefully I will get some answers too. Thank you, Vicki Nighswander MAT, MPH
<p>5/21/2015 Teresa Castleberry terryberry05@gmail.com</p>	<p>Developers should be fully responsible for the improvements to roads to accommodate the increase in traffic that future development will cause. I believe developers should not pay less, but should carry the full burden.</p>
<p>5/21/2015 Cindy Christian siestakeycindy@aol.com</p>	<p>"Developers should be fully responsible for the improvements to roads to accommodate the increase in traffic that future development will cause. I disagree with this methodology. Developers should not pay less, but should carry the full burden."</p> <p>Regarding Benderson development at US41 and Stickney Point Road Cindy Christian Pine Shores</p>
<p>5/21/2015 Martha Bohn marthabohn@yahoo.com</p>	<p>Dear Planner. It is ludicrous not to hold the developer (Benderson) responsible for repair/maintaining the roads in the Pine Shores area. They will be traversing neighborhood roads with heavy equipment, cement trucks, etc to build this</p>

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	<p>development. These neighborhood roads are relatively narrow and fragile. They are aging. They will not withstand the development construction traffic.</p> <p>Why should I/the county have to foot the bill to repair these roads????</p> <p>I urge you to please hold Benderson responsible!! Martha Bohn, resident since 1989.</p>
<p>5/21/2015 Mary Finnegan flarepgal@aol.com</p>	<p>In response to; " All interested parties are encouraged to review and provide input on the revised report for the Fiscal Neutrality Methodology Development process which is presented within Category: 04/ Fiscal Neutrality Methodology on the County webpage at https://www.scgov.net/CompPlan/Pages/Sarasota2050Evaluation.aspx"</p> <p>Many of us have lived here for decades and we believe that the developers should be fully responsible for the improvements to roads to accommodate the increase in traffic that future development will cause. I disagree with your proposed methodology. Developers should not pay less, but should carry the full burden. Mary F</p>
<p>5/21/2015 Ruth A.Steinbrecher ruthsteinb@aol.com</p>	<p>I support the practice of developers' paying the full burden of traffic costs caused by a new development. Ruth A.Steinbrecher</p>
<p>5/21/2015 Mary M. Murray mmmbainbridge@usa.net</p>	<p>"Developers should be fully responsible for the improvements to roads to accommodate the increase in traffic that future development will cause. I disagree with this methodology. Developers should not pay less, but should carry the full burden." Mary M. Murray</p>
<p>5/21/2015 Bill Archibald Billa@micromasters.to</p>	<p>While I agree that charging developers fees just because we can that are above and beyond actual costs is bad, I very strongly believe that developers should be fully responsible for the improvements to roads and other infrastructure to accommodate the increase in traffic, water, sewer, etc. that future development will cause. Developers should not pay less than the cost of improvements, nor more. They are not doing the development for the sake of county residents, but to make money. That's not a bad thing, but as a business endeavor, it must carry ALL costs. I'm all for being more friendly to developers, but this is swinging the pendulum too far.</p> <p>I would strongly recommend smaller steps and see how they pan out as you go. There is no need to try to correct the errors of the past overnight.</p>
<p>5/21/2015 Adrien Lucas atomicholidaybazaar@gmail.com</p>	<p>It was with great enthusiasm I read the report produced by AECOM regarding Fiscal Neutrality. At the November 2015 county commission meeting it was fascinating to watch our County Commissioners vote and pass a methodology that didn't even exist at the time of that particular meeting. I was very curious about the "methodology" that AECOM was tasked to produced and plowed through it, I applaud the report, talk about tedium and appropriation. How much did that report cost? I could have cut and pasted pretty much everything they included from items that are easily found in a Google search.</p>

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However, one item occurred to me that was not included as a possibility in the AECOM report taken from:

Sarasota County Zoning Regulations Article 11, Development Program and Land Sales Value Assumptions -

...Conclusions and Recommendations - ...Also, economic conditions can change. That is why a fiscal neutrality plan is necessary to identify potential courses of action that can be taken to mitigate unanticipated lower values or significant changes in absorption and pacing. AECOM page 12

I couldn't find any methodology or assumption regarding the potential risk of land that has been identified as dangerous to the public. Which leads me to the Carlos Beruff owned property that was rezoned by the current commissioners in November so he can develop homes on top of the former toxic city dump. You all denied the public the possibility of further soil and water testing. That alone was a curiosity, as, if a person is told they have cancer, we are constantly told to get a second opinion. How expensive would it have been to satisfy the surrounding neighbors near Foxfire with two more testings from companies outside of Sarasota? The company hired to perform the soil boring test does business on a regular basis for all of the large developers in town. I am not suggesting that Ardaman is unfit to perform accurate tests, it's just that it appears to be a conflict of interest to have hired Ardaman, when it is known that their biggest clients are the developers in town.

Which leads me to, if the Foxfire Medallion home site turns out to be a true Cancer Cluster site, who financially is responsible for this problem? Will AECOM create a fiscal neutrality recommendation since it is clear that the health and safety of the public in Sarasota is merely an afterthought. However, it may be in the counties best interest to include some kind of rainy day fund for items related to this subject. I know you'd all like to think that things like this will never happen in SRQ but had you truly taken the time to listen to your constituents public comments at that November meeting instead of listening to Carlos Beruff's pocketbook, perhaps this question would not have occurred to me. Will the developers be fiscally responsible for any damages to a home owner's health if found to be directly related to the quality of the land they are living on? Or will the burden of this type of lawsuit fall upon Sarasota tax payers?

Thank you, oh and thanks for sliding the meeting to a very inconvenient hour, you should all have great success pushing this through!

Respectfully,
Adrien Lucas

5/21/2015
Daniel J. Lobeck, Esq.
dlobeck@lobeckhanson.com

Note: The Sarasota County Planning Commission will hold a public hearing on **Fiscal Neutrality**, the subject discussed below, Thursday, May 21, 2015, inconveniently placed near the end of its agenda at a meeting that begins at 6:30 at the Anderson Administration Building in Venice. Although concerned citizens are urged to appear and speak out, unfortunately another commitment prevents my participation at this meeting. Nevertheless, I have provided these comments for

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the record and urge others to do so, at the meeting or by email to **Sarasota County Officials**. The County Commission will have a public hearing on the Fiscal Neutrality changes which is tentatively scheduled for July 8.

Please note also that the County Commission has scheduled meetings on its **Mobility Plan**, a scheme to further slash road impact fees, relieve developers of traffic studies and their proportionate share of road improvements by repealing concurrency, and embrace traffic congestion by those actions as well as by abandoning most road improvements, on the premise that we should be forced to walk and bike wherever we go as well as take buses that get caught in gridlock too. This outrageous proposal, which Commissioners Maio and Hines say "excites" them, is scheduled for a "workshop" (probably a walkaround to talk with staff) at 2 pm Thursday May 28 at the County Operations Center at 1001 Center Boulevard. A draft of the proposal will then be presented to the County Commission at its June 2 meeting. A public hearing for formal consideration will be scheduled at a future date.

I will seek to keep you posted.

-- Dan Lobeck

Control Growth Now Website

Please consider these as my comments on the Fiscal Neutrality methodology the Planning Commission will consider near the end its May 21 meeting in south County. I unfortunately will be unable to attend the meeting.

Thank you,

-- Dan Lobeck

Gutting Fiscal Neutrality

After gutting the rest of the Sarasota 2050 Plan and some parts of fiscal neutrality, the County Commission hired political consultant Donna Arduin to review fiscal neutrality, the requirement that Sarasota 2050 developments (urban growth allowed in rural lands) pay their own way. She recommended that it be repealed, as well as virtually all other controls on development in the County. (The County Administrator Randy Reid had recommended that a neutral expert academic be hired for that review, but he was fired for that and for other postures that did not please the big developers). Next, the Commission hired AECOM, which has a history of giving a pass to developers in its "independent" reviews of their fiscal neutrality reports, despite demonstrated flaws.

Now as the County's fiscal neutrality consultant, AECOM has produced a revised "methodology" for developers to prove their Sarasota 2050 developments are not a burden on the taxpayers. It is more a mythology than a methodology, a fiction designed to insure that developers pay no more than other developers in the County, which is far too low to make growth pay its own way, as evidenced by ever-growing shortfalls today in meeting the demands of new development.

Consider for example that the County Commission recently concluded that it is \$350

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million dollars short in funds for needed expansion of administrative and justice facilities, evidence that County impact fees for those purposes are inadequate. And the lack of sufficient impact fee revenue for a new fire station near the University Town Center Mall. And on and on. Impact fees are demonstrably insufficient for fiscal neutrality. That is why fiscal neutrality was created in the Sarasota 2050 Plan, to add revenue to that produced by impact fees in order to achieve true fiscal neutrality. Now AECOM, and the County Commission if it adopts its report, would throw fiscal neutrality in the trash.

For operating expenses in a fiscal neutrality report, AECOM requires merely a simple “per-capita” analysis. That simply divides the total County budget for each category of expense (law enforcement, fire and rescue, general government, etc.) by the total County population and then multiplies that by the number of residents in the new development, or the proportionate property value of nonresidential development.

AECOM rejects the “case study” approach which it says is used in some fiscal neutrality analyses, saying that is “difficult” for a developer because it “requires an ample amount of time and budget to conduct.” However, that ignores the fact that urban development in rural lands will be more expensive for the County to service in many regards, such as longer trips for law enforcement, fire and rescue, code enforcement and other purposes.

For capital expenses, AECOM says that impact fees will be deemed sufficient, except where County staff somehow identifies an “extraordinary expense” which it requires the developer to pay. Again, no specific study is required to determine each capital facility impact of the development.

This directly and indisputably violates Section 11.2.14.b.3 of the Sarasota County Zoning Code, which provides, “Fiscal Neutrality shall be determined for each development project on a case-by-case basis, considering the location, phasing, and development program of the project.” So AECOM rejects the “case study” approach to fiscal neutrality because it is difficult and expensive for the developer, even though the County Code requires it!

AECOM’s rejection of the “case study” approach also violates Policy VOS 2.9 of the Sarasota County Comprehensive Plan, which requires a detailed report of anticipated facility needs and expenses for each proposed Sarasota 2050 development “on a case-by case basis” for its impact on a list of public facilities depending on the location, phasing and program of the development, according to procedures adopted by the County. Very significantly, that legally binding and mandatory Comprehensive Plan policy then states: “For off-site impacts, the procedures will require that the total proportionate share cost of infrastructure be included and **not simply the existing impact fee rates**” (*emphasis added*). Not just “extraordinary expenses”, as AECOM would require, but all expenses for the expansion of public facilities.

For example, if impact fees for courts, jails and administrative facilities are too low, as is evident by the current large shortfall for those needs, a Sarasota 2050 developer would be required to pay nothing for those facilities beyond the lowballed impact fees, unless an “extraordinary expense” for those purposes was identified by County staff to be specifically triggered by that particular development. And the same for roads throughout the County and for all other facilities.

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AECOM states in its initial draft that a detailed study should not be required because that would be costly to the developer and as such might “have the effect of deterring development.” Can the bias for the developer and against the taxpayer be any more evident?

Section 11.2.14 of the Sarasota County Zoning Code also provides at substantial length the requirements for a detailed analysis of the facility and service impacts of each Sarasota 2050 development, including a specific assessment of each facility impacted by the development according to the County’s adopted levels of service. It further provides, “The [Fiscal Neutrality] Plan shall include reasonable estimates of the cost of such facilities, prepared by a civil engineer, registered in the state of Florida.”

Indeed, AECOM itself, in providing a required independent review of one fiscal neutrality report, faulted it for failing to include those cost estimates by a civil engineer. (The County Commission ended up approving that report despite that legal violation, against the recommendation of its Planning Commission, which sought denial because of that violation and others).

It should also be noted that County financial staff, in reviewing a fiscal neutrality report by Henry Fishkind for Village of Lakewood Ranch South, faulted his conclusion that impact fees are adequate for fiscal neutrality, observing that in fact they are not because impact fees have been proven over time to produce inadequate revenues to pay for all required new public facilities.

Further, the Sarasota County Commission has never implemented full impact fees, most recently slashing already reduced road impact fees by 50% and now proposing to cut them even further, including for “mixed use” developments which may include Sarasota 2050 Villages.

AECOM even states that if impact fees are “temporarily” suspended or reduced even below the artificially reduced rate at which they are adopted, revenues from full impact fees shall be assumed. Although AECOM now states in its revised report that the developer in that instance shall provide a plan to “mitigate” that circumstance, it gives the developer an out. It provides that the developer, as an option to paying higher impact fees, may offer that the County reduce capital facility expenditures – even though that may inadequately handle the development’s impacts -- or “identify other revenue sources.”

Further, by accepting impact fees as adequate to pay for roads, other than “extraordinary expenses” of the County which immediately serve that development, AECOM ignores the requirement of the Comprehensive Plan that fiscal neutrality pay for “Countywide impacts on County, City, State and Federal transportation facilities.” Impact fees are levied only for County-funded roads, excluding for example I-75, on which Sarasota 2050 developments will have a huge impact. The Comprehensive Plan requires that Sarasota 2050 developers pay the County for those impacts, which the County then would contribute towards needed improvements of those state and federal roads.

Although AECOM states that if a developer is required to pay a proportionate share of the cost of any specific road improvement, that will be added to its fiscal neutrality

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payment. However, in its pending "Mobility Plan", the Sarasota County Commission has proposed to repeal the current requirement for a developer to identify and pay for such costs, known as concurrency. Also, although that requirement was also contained in the state law for a Development of Regional Impact (which Sarasota 2050 Villages are generally big enough to fall under), that law was repealed by the 2015 Florida Legislature. So that proportionate share requirement will soon be meaningless.

Although the Sarasota County Comprehensive Plan explicitly requires that each fiscal neutrality analysis conduct an inventory of the facility improvements required for each Sarasota 2050 development, AECOM in its initial report dismissed that legally binding requirement as not "feasible" due to the time and cost of that study by the developer. AECOM also violates the Comprehensive Plan by excluding public hospitals and transit as expenses for which the developer must pay its share, in AECOM's latest draft of its Fiscal Neutrality Guide. Although AECOM begrudgingly revised its Analysis to acknowledge that hospital and transit impacts are required (after its omission of those expenses in its initial draft was criticized) it continues to omit them in the AECOM Fiscal Neutrality Guide itself. Even in the revised analysis, AECOM states that only a "marginal" consideration of hospitals and transit should be provided, after interviews with hospital and transit staff, not based on a professional study of the development's impacts on hospital and transit needs, as required by the Comprehensive Plan and County Code.

AECOM also violates the Comprehensive Plan by omitting water supply and delivery, sewage transmission and treatment, solid waste and storm and surface water management from fiscal neutrality analysis, again on the basis that there are impact fees for such facilities and that they are funded by utility rates. What this disregards is that taxes and utility rates are also used for those purposes. Fiscal neutrality requires that the applicant demonstrate that taxpayers and ratepayers will not have to pay for facility improvements required to serve the Sarasota 2050 development.

AECOM allows a developer to overestimate income by assuming tax revenues in the year occupied, even though AECOM acknowledges that "there is typically a 'lag' of one year" after occupancy for taxes to begin to be assessed. This is typical of AECOM overstating revenues and understating expenses, to the benefit of the developer and the detriment of the taxpayers. Because of the one year lag, tax revenues should be counted beginning in the year following occupancy. AECOM offers as its only explanation for its recommendation that it is a matter of "simplicity". Starting tax revenues in the year after occupancy is not only also simple, it is by contrast accurate.

AECOM allows a developer to assume revenue from commercial development based on the gas tax and telecommunications tax paid by the employees. While there is some basis to allow a count of some portion of an employee's gas tax, it overstates revenue to allow all of that gas tax because only part of the employee's driving is to and from work. And there is no basis whatsoever for counting the telecommunication (phone and Internet bill) tax paid by the employees.

This gutting of fiscal neutrality, if approved by the County Commission, is a betrayal to the taxpayers as and a threat to the adequacy of public facilities. It well serves the big developers who are so influential in recruiting and bankrolling County Commission candidates but it ill serves those who our public servants are supposed to be elected to

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	<p>serve. -- Dan Lobeck</p>
<p>5/20/2015 Condello pam223@comcast.net</p>	<p>"Developers should be fully responsible for the improvements to roads to accommodate the increase in traffic that future development will cause. Developers should not pay less, but should carry the full burden." Please do not let the developer of Siesta Key Promenade get away with not paying completely for the wear and tear on our old roads and they should pay completely for the new roads. We do not need another shopping center. There are too many vacant commercial buildings in town already. There is too much traffic at Stickney Point and 41 and this center will clog the intersection even more. Many times we sat thru 4 to 5 lights to get thru that intersection in season. This will make is worse. If you vote to allow it, then the developer should bear all the costs as developer gets the profits and we get the headaches.</p> <p>Condello 5914 Tidewood Ave Sarasota, FL 34231</p>
<p>5/20/2015 Sura Kochman skbaystate@aol.com</p>	<p>I feel that developers should be fully responsible for the improvements to roads to accommodate the increase in traffic that future development will cause. I disagree with this methodology. Developers should not pay less, but should carry the full burden.</p> <p>Sura Kochman Resident, Pine Shores</p>
<p>5/20/2015 Lucy Gallo lucy.gallo@dpfg.com Development Planning & Financing Group, Inc.</p>	<p>Development Planning & Financing Group, Inc. (DPFG) sincerely appreciates the opportunity to provide comments on the revised draft report "Sarasota County Fiscal Neutrality Analysis" dated May 8, 2015.</p> <p>The following observations are shared for your consideration. <i>Capital Revenues and Expenses</i> The revised guide states, "<i>Capital revenue sources</i> include impact fees in effect at the time of the application (note that the full impact fee—in the event of any temporary reduction— must be used). A temporary reduction of impact fees may result in a gap between revenues generated by fully calculated impact fees and the reduced impact fee schedule. In such case, the Fiscal Neutrality Plan submission must include a mitigation strategy to close that gap and achieve fiscal neutrality. Applicants may offer to reduce County capital expenses relative to the development, <i>pay additional impact fees</i> above and beyond the reduced amount, or identify other revenue sources." The guide also states, "For areas where levels of service are adequate and there are no extraordinary expenses, the full impact fee structure will be considered an adequate representation of [<i>capital</i>] costs to the county."</p> <p>The proposed language implies that temporarily reduced (or suspended) impact fees would apply to certain developments (i.e. those not subject to fiscal neutrality requirements); whereas, other developments would pay reduced impact fees plus mitigation (voluntary impact fees?) in amounts as if the full impact fees were assessed. Is</p>

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	<p>the intent of the guide to imply reduced impact fees would apply to some, but de facto full impact fees would apply to others? If so, this is an inequitable outcome as each new housing unit in the County bears the same (proportionate) capital cost per service unit (equivalent dwelling unit or EDU). Has the legality of this methodology been investigated?</p> <p>The inventory replacement method is by far the most aggressive of the various impact fee methodologies and its application commonly results in the discounting of calculated fees to levels that are deemed appropriate by elected officials.</p> <p><i>Proportionate Share</i></p> <p>To properly reflect the fiscal impact of proportionate share capital road improvements, the costs should be compared to the projected road impact fee revenues of the proposed development. According to Sarasota County Transportation Planning staff, "While fiscal neutrality may share some common methods and studies with impact analysis for capital facilities, fiscal neutrality is not part of the adequate facilities or concurrency requirement. It is a test only designed to show that the revenues generated and payments made by the development will offset the impacts created." This approach has been consistently applied and approved in the 12 fiscal neutrality submissions to date. To avoid misinterpretation, I suggest clarification of the text on page 22 of the report and page 13 of the guide and modification of the presentation below.</p> <p>We will be happy to discuss these comments further at your convenience. Thank you again for the opportunity to be part of the process.</p> <p>Sincerely, Lucy L. Gallo Managing Principal - Southeast</p>
5/19/2015 Vicki Nighswander MAT, MPH Nighswan1@gmail.com	<p>I finally have found a dynamic website on crash/accident data at intersections. As I digest this information, I felt it should be shared. This is the data that should be considered in the building and development approval process as a consequence of growth in the area. Static data from 2010 or earlier makes for an antiquated and inappropriate approach when the safety of our populace is said to be of prime importance and growth consequences are increasing. The impact of development at radii intervals from high incidence intersections must be added to the approval process and impact fees and also in the fiscal neutrality methodology. Feel free to pass this on to AECOM.</p> <p>Vicki Nighswander https://firesportal.com/Pages/Public/PublicSearchMap.aspx?Id=19&CL=1</p>
4/10/2015 Daniel J. Lobeck, Esq. dlobeck@lobeckhanson.com	<p>Again, this is to inquire whether AECOM will be revising its first draft of the proposed new fiscal neutrality methodology in response to public comments, or whether the County is plowing ahead with the draft prepared by AECOM in consultation with developer representatives, for consideration by the Planning Commission on May 21.</p> <p>If the latter, will the County and AECOM at least be consulting about the public comments before the May 21 meeting and if so, will there be any written communications in that regard?</p> <p>Thank you, -- Dan Lobeck</p>

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<p>4/7/2015 Daniel J. Lobeck, Esq. dlobeck@lobeckhanson.com</p>	<p>I find it alarming that there is evidently no plan to have AECOM consider the preparation of a revised draft in response to public comments but that instead the current draft will go directly to a public hearing of the Planning Commission on May 21, with AECOM apparently defending its current report at that time.</p> <p>And I see that no one from the development sector commented on the draft report, only members of the public who all found serious fault with it. That is not surprising however in light of the fact that representatives of the development sector were given exclusive access to the consultant in preparing the current report and, as evidenced by an email in the public records, got everything they want.</p> <p>Am I wrong in any of these conclusions? Thank you, -- Dan Lobeck</p>
<p>4/4/2015 Lawrence Smith tenith@yahoo.com</p>	<p>The draft report should be rejected.</p>
<p>4/4/2015 Jason Boehk jbeck.star@gmail.com</p>	<p>I submit for the public record my comments on the "Draft Project Report -- Sarasota Fiscal Neutrality Analysis."</p> <p>County taxpayers like myself expect that County professionals tasked with developing important fiscal methodologies, will do so in the spirit of a keen fidelity to our County Charter.</p> <p>Implementing a sound and genuinely enforceable fiscal neutrality methodology will be critically important for ensuring the future "quality of life" of Sarasota County.</p> <p>With this in mind, I urge you to reject the AECOM report, because it is unfairly biased towards developers, guts fiscal neutrality and violates the County Comprehensive Plan and Zoning Code.</p> <p>The biggest defect in the report is its conclusion that impact fees paid by any developer are enough to satisfy fiscal neutrality by a Sarasota 2050 developer. That has the effect of making the fiscal neutrality requirement meaningless, and directly violates the fiscal neutrality requirement of the Comprehensive Plan.</p> <p>In examining the AECOM report, I urge you to ask the following substantive questions:</p> <p>1. Was the report prepared with the public interest in mind, by providing access regarding its input and content to qualified civic leaders, including those who have been integrally involved in advocating for genuine "sensible planning," fiscal integrity, and sustainability? Or were public interest advocates excluded, with input and access limited solely to development interests and developer consultants?</p> <p>If the latter, then the report is fundamentally biased and must be rejected.</p>

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2. Is it true that the AECOM report substantially incorporates positions promoted by developers and their consultants in a January 30, 2015 conference call?

If so, the report is fatally flawed by not properly representing the full scope of legitimate public interests, and must be rejected.

3. Is the AECOM draft methodology designed to minimize and/or eliminate, any requirement for a fiscal neutrality payment from developers of Sarasota 2050 developments, as well as to relieve them from required studies and reports?

If so, the report betrays the interests of Sarasota taxpayers and must be rejected.

4. Does the AECOM report propose that instead of a detailed report of anticipated facility needs and expenses, impact fees will be deemed sufficient to meet fiscal neutrality?

If so, the report contravenes the County Comprehensive Plan and Zoning Code, and therefore must be rejected.

5. Does the AECOM report violate Policy VOS 2.9 of the Sarasota County Comprehensive Plan, which requires a detailed report of anticipated facility needs and expenses for each proposed Sarasota 2050 development "on a case-by case basis" for its impact on a list of public facilities depending on the location, phasing and program of the development, according to procedures adopted by the County.

If so, you have no choice but to reject the AECOM report.

6. Does the AECOM draft state that a detailed study should not be required because that would be costly to the developer and as such might "have the effect of deterring development?"

If so, the report appears designed to promote superfluous, costly-to-taxpayer development and must be rejected.

7. Does the AECOM report argue that the cost of the fiscal neutrality study required by the Comprehensive Plan is "not practical" because of the expense of the study?

If so, the AECOM report is embarrassingly transparent in its true purpose of undermining the Chartered goal of genuine fiscal neutrality, and must be rejected.

8. Does this AECOM draft directly violates Section 11.2.14 of the Sarasota County Zoning Code, which provides at substantial length the requirements for a detailed analysis of the facility and service impacts of each Sarasota 2050 development, including a specific assessment of each facility impacted by the development according to the County's adopted levels of service?

If so, this report must be rejected.

9. Does the AECOM report promote the false notion that impact fees alone are sufficient for fiscal neutrality?

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If so, the report must be rejected, because it brazenly ignores the very reason why fiscal neutrality was created in the Sarasota 2050 Plan.

10. Does the AECOM report suggest that the County suspend or reduce impact fees and still deem the result to be sufficient for fiscal neutrality?

If so, the report must be rejected, because such a scheme would be neither fiscally neutral nor legal, according to the Comprehensive Plan and Zoning Code.

11. Does the AECOM report propose to accept impact fees as being adequate to pay for roads?

If so, the report must be rejected, as it ignores the requirement of the Sarasota County Comprehensive Plan that fiscal neutrality pay for "Countywide impacts on County, City, State and Federal transportation facilities."

12. Does the AECOM report violate the Comprehensive Plan by stating that Sarasota 2050 developers should be excused from paying for their impacts on public hospitals, simply because the County Commission does not decide the expenses and persons outside the County can use the hospitals?

If so, the report must be rejected.

13. Does the AECOM report also violate the Comprehensive Plan by omitting public transit from its list of fiscal neutrality items?

If so, and for this and other reasons, the AECOM report must be rejected.

To conclude:

In light of the questions posed above, and the self-evident answers as outlined in the AECOM report, I urge you to reject the AECOM report, because it is unfairly biased towards developers, guts fiscal neutrality and violates the County Comprehensive Plan and Zoning Code.

The biggest defect in the report is its conclusion that impact fees paid by any developer are enough to satisfy fiscal neutrality by a Sarasota 2050 developer. That has the effect of making the fiscal neutrality requirement meaningless, and directly violates the fiscal neutrality requirement of the Comprehensive Plan.

Thank you for your time and consideration.

Sincerely,
Jason Boehk
Sarasota, Florida

4/4/2015
S. Kochman
skbaystate@aol.com

The report by the County's consultant is unfairly biased towards developers, guts fiscal neutrality and violates the County Comprehensive Plan and Zoning Code.

It's time our government is for the people, not perceived as in the developers pockets.

Date Received Name Representation email	Comments received in response to the following request: Please review the latest information on developing a clear and transparent methodology for determining Fiscal Neutrality on 2050 developments and share your thoughts in the box below (Latest information is within Category: 04/ Fiscal Neutrality Methodology).
	S. Kochman
4/4/2015 Harmon Heed harmonheed@yahoo.com	<p>Tom,</p> <p>I strongly urge you and your staff to take the recommendations of the AECOM report lightly in your recommendations to the BOC. I have perused the AECOM report and consider its recommendations to be not what the residents of this county want but what the developers want to make even more money. If you have ever been in a developer's car or home you know they are already making a hell of a lot more money than most county residents.</p> <p>My main concern is fiscal neutrality and impact fees. I firmly believe that I should not have to pay for new infrastructure to support new development. I gladly paid for my infrastructure when I had my home built. I paid for the impact fees the developer passed on to me in the price of my home. Sure, the developer had to spend time and upfront funds for studies but those funds and the interest on them were passed on to me. They didn't cost the developer anything.</p> <p>Sarasota County lowered impact fees twice during the recession to increase development. Who benefitted? Not the county because its up front taxes were reduced. But it definitely benefitted the developers who could sell their houses or commercial/retail property cheaper without lowering their profit margin. If you have ever been in the car or home of a major developer you know they are already making one hell of a lot more money than the average affluent Sarasota County resident.</p> <p>Now they are pushing to have the impact fees become "mobility fees" that the BOC can divert to projects other than new infrastructure to support new development. To me that's asinine as the federal government putting/draining the social security funds into its general funds.</p> <p>The recession is over. Pat Neal says he will pay cash for development property. Manatee County is booming with Southern California sprawl. That's what the developers want but not what we residents of Sarasota County want.</p> <p>I strongly urge you to recommend to the BOC that they increase the impact fees and keep them to pay for new development infrastructure and not a "flexible mobility fee" that come and go commissioners can spend at their whim. And include in those impact fees future mass transit funds to help pay to eliminate future traffic congestion.</p> <p>Sincerely, Harmon Heed</p>
4/3/2015 Joseph F. Knowles Josephk668@aol.com	<p>I think the report by the County's consultant is unfairly biased towards developers, guts fiscal neutrality and violates the County Comprehensive Plan and Zoning Code.</p> <p>As a homeowner and taxpayer since 2007, I don't see why I should pay for costs incurred by developers in neighborhoods I will probably never see let alone live in. While the developers reap profits they are not entitled to.</p> <p>Please reject the report and tell these developers that free enterprise means that they need to invest 100% of the costs if they expect to receive 100% of the profits. That's how the free enterprise system works, isn't it?</p> <p>Joseph F. Knowles 4450 Yacht Club Drive South Venice FL 34293</p>

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<p>4/3/2015 Cathy Antunes Cathy.antunes@comcast.net</p>	<p>In addition to echoing Dan's questions, I'd like to know if AECOM submitted a fiscal neutrality report to the County on behalf of Neal Communities.</p> <p>In a review of 2050 fiscal neutrality documentation, I recall seeing an AECOM fiscal neutrality report prepared for Blackburn Creek, otherwise known as Grand Palm, a Neal Communities 2050 project.</p> <p>Was AECOM hired by the County or Neal Communities to do a fiscal neutrality report for a Neal Communities 2050 project?</p> <p>If AECOM was hired by Neal Communities to produce a 2050 fiscal neutrality report, does AECOM have a conflict in also working for Sarasota County on the same issue?</p> <p>Thank you for including this question in the public feedback regarding the AECOM fiscal neutrality methodology work.</p> <p>Best regards, Cathy Antunes</p>
<p>4/3/2015 Cathy Antunes Cathy.antunes@comcast.net</p>	<p>Here is the document which gives rise to my question. It appears the County hired AECOM as an independent advisor at Neal Communities' expense. As an independent advisor, AECOM notes they take the assumptions and analysis at face value, and they say no original analysis or verification of key assumptions was performed. In other words, AECOM conducted no fact checking, no assumption verification. The also say they did not evaluate the fiscal model being used.</p> <p>I assume then, that AECOM will not be relying on their prior analyses for Sarasota County as support for their current fiscal neutrality methodology work, as they now are charged with developing a reliable fiscal neutrality methodology and it follows that they must concern themselves with the validity of assumptions, fact-checking and accuracy of the methodology. Please verify that AECOM will not be using their prior work for Sarasota County as a basis for their development of our fiscal neutrality methodology, because it appears that to do so would be relying on information, assumptions and methods which have not been verified as accurate.</p> <p>Thank you,</p> <p>Cathy Antunes</p>
<p>4/3/2015 Jonathan R. Katz Jrkatz1@aol.com</p>	<p>I am a resident of Sarasota County. I would like to express my dissatisfaction with how the Draft Report on Fiscal Neutrality has been handled. There has been a strong bias in favor of the interests of developers.</p> <p>While economic development is important and developers held grow our community, what good is this growth if there are not adequate means to deal with its infrastructure repercussions. Developer profits are taken long before the detrimental infratstructural financial impacts rear their extremely challenging head.</p>

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	<p>There must be more fairness here, not a limiting of financial responsibility due to the lobbying and therefore political power of development interests. The draft report appears to give short-shrift to a longer, more well-intentioned perspective of the fiscal neutrality issue.</p> <p>Sincerely, Jonathan R. Katz 4900 Fallcrest Circle Sarasota, FL 34233</p>
<p>4/3/2015 Daniel J. Lobeck, Esq. The Law Offices of Lobeck and Hanson, PA dlobeck@lobeckhanson.com</p>	<p>ALERT ALERT ALERT</p> <p>PLEASE GIVE SARASOTA COUNTY YOUR INPUT TODAY ON FISCAL NEUTRALITY -- TELL THEM THE DRAFT REPORT SHOULD BE REJECTED</p> <p>Today, Friday April 3 by midnight is the stated deadline to give input to the County's consultant on its draft report on fiscal neutrality.</p> <p>You can send an email by clicking here: Email County Here</p> <p>Sorry for the late notice but things have been busy. If you miss today's deadline, please email the County anyway, as it will be part of the record whether or not the County's consultant considers it.</p> <p>Please take a moment to email the County to tell them that the report by the County's consultant is unfairly biased towards developers, guts fiscal neutrality and violates the County Comprehensive Plan and Zoning Code.</p> <p>Again, you can send an email to the County on this by clicking here: Email County Here: Email County Here</p> <p>The biggest defect in the report is its conclusion that impact fees paid by any developer are enough to satisfy fiscal neutrality by a Sarasota 2050 developer. That has the effect of making the fiscal neutrality requirement meaningless, and directly violates the fiscal neutrality requirement of the Comprehensive Plan.</p> <p>That and other observations are in my analysis of the report, below. If you want to tell the County that you support Dan Lobeck's position on this, that would be sufficient, but additional comments by you would be useful.</p> <p>If you want to review the full report by the consultant you can find it here: Draft Report on Fiscal Neutrality</p> <p>Again, my full comments to the County on this are provided below.</p> <p>I appreciate your considerations and support for the public interest and taxpayers of our community.</p> <p>-- Dan Lobeck</p>
<p>4/3/2015 Terry Rawson</p>	<p>Dear Commissioners, Your fiscal neutrality plan does not result in anything like fiscal neutrality. It will</p>

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tandsrawson@gmail.com	<p>saddle those of us paying taxes to Sarasota to take on paying for most of all future infrastructure.</p> <p>You are again burdening we the people to please your masters...the builders and developers.</p> <p>Please listen to the voters, not the rich builders.</p> <p>The draft report must not be approved.</p> <p>Terry Rawson</p>
<p>4/3/2015 Edwin W. Martin edwilsonmartin@hotmail.com</p>	<p>I find this plan shifts the burden to current taxpayers instead of reasonably payment by new owners and project developers. In short, it is not fiscally neutrality.</p>
<p>4/3/2015 Daniel J. Lobeck, Esq. The Law Offices of Lobeck and Hanson, PA dlobeck@lobeckhanson.com</p>	<p>This is to comment on AECOM's draft Fiscal Neutrality Methodology, dated March 11, 2015.</p> <p>I request that you and AECOM consider not only this and other comments submitted by today's stated deadline for comment, but also all others which may come to you after today.</p> <p>First, this is to object to the process by which this draft was prepared. County government provided access to the consultant in preparing the draft only to fiscal neutrality consultants for developers and rejected repeated requests by me and other public interest advocates for such access.</p> <p>It is therefore not surprising from this bias (and perhaps other indications given to AECOM that the County wishes to accommodate the developers' preferences) that the draft report precisely adopts all of the positions advocated by the developer representatives in a January 30, 2015 conference call between them, AECOM and County staff, as set forth in a memo of that date by AECOM representatives Christine Graziano and Mac Nichols.</p> <p>I was the person who initially conceived of and proposed fiscal neutrality as an element of the Sarasota 2050 Plan, as the drafter of the statement for public interest advocates in the Multi Stakeholder Group, which led to the Plan. I also wrote the fiscal neutrality policy which was included in the Comprehensive Plan amendment that created Sarasota 2050, by the Sarasota County Planning Commission, to replace a weaker policy which had been proposed by staff. I have reviewed most of the fiscal neutrality reports and peer reviews produced under the Plan and critiqued several of them, and cross-examined economist Henry Fishkind about fiscal neutrality as a witness for the County in an administrative challenge and as a developer witness at a public hearing. Yet I was purposefully excluded, as were other public interest advocates, from providing input to AECOM is preparing its draft fiscal neutrality methodology. That opportunity instead was provided exclusively to developer consultants, who are now having their way.</p> <p>The current draft methodology is clearly intended to minimize, indeed to eliminate, any requirement for a fiscal neutrality payment from developers of Sarasota 2050 developments, as well as to relieve them from required studies and reports.</p>

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The most pernicious proposal by AECOM is that instead of a detailed report of anticipated facility needs and expenses, impact fees will be deemed sufficient to meet fiscal neutrality.

That means that a developer of a Sarasota 2050 Village or Hamlet will pay nothing more than it would have to pay anyway without the Sarasota 2050 fiscal neutrality requirement, and will be relieved from doing a detailed fiscal neutrality study.

This directly and indisputably violates Policy VOS 2.9 of the Sarasota County Comprehensive Plan, which requires a detailed report of anticipated facility needs and expenses for each proposed Sarasota 2050 development "on a case-by case basis" for its impact on a list of public facilities depending on the location, phasing and program of the development, according to procedures adopted by the County. Very significantly, that legally binding and mandatory Comprehensive Plan policy then states: "For off-site impacts, the procedures will require that the total proportionate share cost of infrastructure be included and not simply the existing impact fee rates" (emphasis added).

AECOM states that a detailed study should not be required because that would be costly to the developer and as such might "have the effect of deterring development." Can the bias for the developer and against the taxpayer be any more evident?

AECOM argues that the cost of the fiscal neutrality study required by the Comprehensive Plan is "not practical" because of the expense of the study, which they suggest would be somehow passed on to consumers and taxpayers. Although this consideration is besides the point because the study is required by the Comprehensive Plan, it is doubtful that a developer will pass on the cost to the consumer (any more than it would impact fees or fiscal neutrality exactions) because it just makes sense that the developer will charge the highest market price it can get from a consumer regardless of the developer's costs. The costs come out of the developer's profits, which is why the developers are so set against fiscal neutrality (and impact fees). And as far as consideration of the taxpayers, surely having a study which could get the developer to pay more and the taxpayers to pay less is worth the extra staff time to review the study, which is the cost to taxpayers that AECOM says it wants to avoid. (In any event, under the County Zoning Code, an independent review of the study is done at the developer's expense).

And if in fact true fiscal neutrality discourages urban sprawl and instead encourages infill, is that not a legitimate planning objective? Additionally, this AECOM proposal directly violates Section 11.2.14 of the Sarasota County Zoning Code, which provides at substantial length the requirements for a detailed analysis of the facility and service impacts of each Sarasota 2050 development, including a specific assessment of each facility impacted by the development according to the County's adopted levels of service. It further provides, "The [Fiscal Neutrality] Plan shall include reasonable estimates of the cost of such facilities, prepared by a civil engineer, registered in the state of Florida."

Indeed, AECOM itself, in providing a required independent review of one fiscal neutrality report, faulted it for failing to include those cost estimates by a civil engineer. (The County Commission ended up approving that report despite that legal violation, against the recommendation of its Planning Commission, which

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sought denial because of that violation and others).

It should also be noted that the County's financial staff, in reviewing a fiscal neutrality report by Henry Fishkind for Village of Lakewood Ranch South, faulted his conclusion that impact fees are adequate for fiscal neutrality, observing that in fact they are not adequate because impact fees have been proven over time to produce inadequate revenues to pay for the expansions of public facilities needed to serve new development.

Further, the Sarasota County Commission has never implemented full impact fees, most recently slashing already reduced road impact fees by 50% and now proposing to cut them even further, including for "mixed use" developments which may include Sarasota 2050 Villages.

Consider also that the County Commission recently concluded that it is \$350 million dollars short in funds for needed expansion of administrative and justice facilities, evidence that County impact fees for those purposes are inadequate. And the lack of sufficient impact fee revenue for a new fire station near the University Town Center Mall. And on and on. Impact fees are demonstrably insufficient for fiscal neutrality. That is why fiscal neutrality was created in the Sarasota 2050 Plan, to add revenue to that produced by impact fees in order to fully make urban growth in the rural lands pay its own way. Now AECOM, and the County Commission if it adopts its report, would throw fiscal neutrality in the trash.

Together with the recent gutting of the other requirements of Sarasota 2050 by the County Commission, this destruction of fiscal neutrality would render the Sarasota 2050 Plan nothing more than a public fraud and the development it allows nothing more than standard urban sprawl on the backs of the taxpaying public.

In its draft methodology, AECOM adds insult to injury by stating that if the County suspends or reduces impact fees that will still be deemed sufficient for fiscal neutrality. How on earth can that be fiscally neutral? And how can it be legal? The Comprehensive Plan and Zoning Code do not allow any reduction or suspension of the fiscal neutrality requirement.

Further, by accepting impact fees as adequate to pay for roads, AECOM ignores the requirement of the Sarasota County Comprehensive Plan that fiscal neutrality pay for "Countywide impacts on County, City, State and Federal transportation facilities." Impact fees are levied only for County-funded roads, excluding for example I-75 -- on which Sarasota 2050 developments will have a huge impact. The Comprehensive Plan requires that Sarasota 2050 developers pay the County for those impacts, which the County then would contribute towards needed improvements of those state and federal roads.

Although AECOM states that if a developer is required to pay a proportionate share of the cost of any specific road improvement, that will be added to its fiscal neutrality payment. However, in its pending "Mobility Plan", the Sarasota County Commission has proposed to repeal the current requirement for a developer to identify and pay for such costs, known as concurrency. Also, although that requirement is also contained in the state law for a Development of Regional Impact (which Sarasota 2050 Villages are generally big enough to be), that law is pending repeal in the State Legislature. So if matters proceed

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on their current course, that proportionate share requirement will be meaningless.

Although the Sarasota County Comprehensive Plan explicitly requires that each fiscal neutrality analysis conduct an inventory of the facility improvements required for each Sarasota 2050 development, AECOM somehow dismisses that legally binding requirement as not "feasible" due to the time and cost of that study by the developer. Instead, AECOM instead prefers the approach of the County's impact fees, which AECOM acknowledges is not inventory driven (as required by the Comprehensive Plan) but instead calculates an increment of impact (such as the length and frequency of trips per resident for residential road impact fees).

AECOM also violates the Comprehensive Plan by stating that Sarasota 2050 developers should be excused from paying for their impacts on public hospitals, simply because the County Commission does not decide the expenses and persons outside the County can use the hospitals. These are not legal justifications for ignoring the Comprehensive Plan requirement that public hospitals be included. The Sarasota Public Hospital Board levies taxes on County property owners and has a capital facility plan, which together can be the basis for calculating the fiscal neutrality impacts for public hospitals. This is not all that different than the calculations for schools.

AECOM also violates the Comprehensive Plan by omitting public transit from its list of fiscal neutrality items. County staff and the Board of County Commissioners considered the recommendation of consultant Donna Arduin that public transit be excluded by a Comprehensive Plan amendment, and explicitly rejected that recommendation, deciding that mass transit will remain included. AECOM also violates the Comprehensive Plan by omitting water supply and delivery, sewage transmission and treatment, solid waste and storm and surface water management from fiscal neutrality analysis, again on the basis that there are impact fees for such facilities and that they are funded by utility rates. What this disregards is that taxes and utility rates are also used for those purposes. Fiscal neutrality requires that the applicant demonstrate that taxpayers and ratepayers will not have to pay for facility improvements required to serve the Sarasota 2050 development.

AECOM allows a developer to overestimate income by assuming tax revenues in the year a home or other building is occupied, even though AECOM acknowledges that "there is typically a 'lag' of one year" after occupancy for taxes to begin to be assessed. This is typical of AECOM overstating revenues and understating expenses in its proposal, to the benefit of the developer and the detriment of the taxpayers. Because of the one year lag, tax revenues should be counted beginning in the year following occupancy. AECOM offers as its only explanation for its recommendation that it is a matter of "simplicity". Starting tax revenues in the year after occupancy is not only also simple, it is by contrast accurate.

AECOM allows a developer to assume revenue from commercial development based on the gas tax and telecommunications tax paid by the employees. While there is some basis to allow a count of some portion of an employee's gas tax, it overstates revenue to allow all of that gas tax because only part of the employee's driving is to and from work. And there is no basis whatsoever for counting the telecommunication (phone and Internet bill) tax paid by the

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	<p>employees.</p> <p>Sarasota County government has now put AECOM's draft methodology out for public review. It remains to be seen whether any public comments such as those offered here will be taken seriously or whether that review is just window dressing to make it look like it is not only the developer's views which are considered.</p> <p>Considering however the fact that only the developer's point of view was allowed to be presented to AECOM in preparing its draft and considering that the developer's positions were adopted wholesale by AECOM, one may be allowed some skepticism whether the process is loaded and predetermined to favor the developers over the public interest.</p> <p>As to whether Sarasota 2050 developments will be fiscally neutral, AECOM's draft report is more mythology than methodology, given its fanciful falsehoods and blatant violations of the Comprehensive Plan and Zoning Code.</p> <p>The taxpayers deserve better. Integrity requires it. Daniel J. Lobeck, Esq. The Law Offices of Lobeck and Hanson, PA 2033 Main Street, Sarasota, FL 34237</p>
<p>4/3/2015 Kathy Butler kbofsrq@hotmail.com</p>	<p>PLEASE save Sarasota and stop siding with the few who have deep pockets. We live in a beautiful place...what if your allowing big developers free-reign has Sarasota looking like St. Pete or Tampa ... with overpasses everywhere ...totally ruining our piece of paradise.</p> <p>Yesterday, two historic buildings on the south trail were razed...the Bispham Victorian house (Cy is probably rolling over in his grave) and the service station. Fie on those who allowed this to happen.</p> <p>After WWII, the city of Frankfort, Germany chose to rebuild in a modern style; whereas Munich rebuilt as it was before it was bombed. Frankfort is a city to fly in an out of...Munich is at city to visit and experience its charm. Sarasota has that charm, but if you keep allowing developers to have the upper hand, our jewel of a city will be covered in overpasses, concrete and strip malls.</p> <p>Kathy Butler, a 44 year, tax paying resident</p>
<p>4/3/2015 Margaret Smith hse.margaretsmith@yahoo.com</p>	<p>Dear Sarasota County and all Growth Consultants-</p> <p>Here we go again- Deja vue time! Have we learned nothing in the last decade about community sustainability?</p> <p>Time to stand up for the tried and true and hard-fought policy of fiscal neutrality. I have heard that we have over 12,000 "units" in the permitted and/or build stage right now. More on the way, right? Everywhere I went these last 3-4 months, everyone was complaining about</p> <ol style="list-style-type: none"> 1) roads being insufficient to handle the current and future influx of visitor traffic, esp scary for senior residents 2) infrastructure generally needing serious, sometimes emergency assist (water

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	<p>main breaks under US 41, for example; sewage pump station that just can't get finished; the "forever" conversion plan for septic along Phillippi Creek)</p> <p>3) too much development causing retail blight and "die out" of existing commercial centers</p> <p>4) increased taxes on residents as a result of developers enriching themselves without paying their fair share of the growth they cause (Benderson being No 1 offender).</p> <p>Question for you all- When your leadership takes us to the Ft. Lauderdale, and then the Miami model- Will our taxes go up or down? Will we have additional middle class (not just min. wage) employment to benefit us? How will seniors cope?</p> <p>If you cannot show the clear benefit to our out of control growth- Why allow it? Then again- If there is a clear benefit demonstrated by any other larger city- Why not move there yourselves? Grass is greener there, right?</p> <p>Really, I know the answer-- Heck, we all know the answer! Individuals (you and me) with power want more power and more personal gain, and are willing to do whatever they need to do to get that today, with tomorrow being the other guy's problem. AM I RIGHT? Please ask yourselves in the middle of the night, and see if you are OK with selling out.</p> <p>Margaret Smith Sarasota, Florida</p>
<p>4/3/2015 Sharon M. Guy Law Office of Sharon M. Guy, P.A. shguy2003@yahoo.com</p>	<p>Below is my comment on AECOM's draft Fiscal Neutrality Methodology dated March 11, 2015.</p> <p>Please reject the draft report on fiscal neutrality. It is unfairly biased toward developers, was created without any input from citizens, will destroy fiscal neutrality, and violates the County Comprehensive Plan & Zoning Code. Impact fees paid by developers will not be sufficient to satisfy fiscal neutrality, especially since they have been greatly reduced at the same time that infrastructure needs are growing. The interests of the public and taxpayers should be considered here. This is our community.</p> <p>Sharon M. Guy Law Office of Sharon M. Guy, P.A. 8586 Potter Park Drive Sarasota, FL 34238</p>
<p>4/1/2015 Cathy Antunes cathycantunes@gmail.com</p>	<p>Vicki Nighswander's comments on the AECOM report represent concerns shared by Citizens for Sarasota County, a growing network of Sarasota residents.</p> <p>Please give her questions and concerns appropriate weight. The CFSC currently has over 400 members.</p> <p>Here are some concerns regarding AECOM's fiscal neutrality methodology include:</p> <p>Does AECOM support road impact fees as sufficient to meet fiscal neutrality requirements even though staff has said that is not true, and the County's fiscal neutrality ordinance explicitly states road impact fees are not sufficient? AECOM's analysis appear to deviate</p>

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from County ordinances.

Does AECOM methodology give full credit to a developer for paying "temporarily" reduced impact fees? This is problematic. Is a huge loophole being deliberately created here?

Is AECOM integrating state law changes on concurrency and Developments of Regional Impact into its policy recommendations, so that County fiscal neutrality policy is consistent with the County Charter - requiring development outside the USB to be fiscally neutral, that it pay ALL of its infrastructure costs outlined in County ordinance?

Does the AECOM methodology exempt developers from contributing to any public hospital expansions, in violation of the County Comp Plan which clearly requires appropriate financial contribution to public hospital expansions?

I will review and send any more comment by April 3rd, the deadline for requested public comment.

Thank you,

3/31/2015
Vicki Nighswander
MAT, MPH
Nighswan1@gmail.com

Dear Co. Administrator, County Commissioners and Co. Planners,
Here are my issues with the draft Fiscal Neutrality Analysis Report by AECOM.

1. The present congestion and safety problems were predictable. Growth in population and all that goes along with it is inevitable. At another level and a precursor to Fiscal Neutrality analysis for new development, a dynamic process of needs assessment that documents local health, safety and sustainability needs to be a priority discussion and consideration for any new construction initiative with all impacted entities of concern. These present considerations will present the lay of the land and predictions for impact. Lack of attention to on-going needs assessment with priority areas of health, safety and sustainability is leading this region into a growth pattern that no one wants, a reactionary verses proactive approach to growth and its consequences.
2. Among others, hospitals do need to be part of this discussion, not excluded as indicated in the AECOM report. We have a growing elderly population with accessibility and other particular needs that should be part of the local growth equation along with health needs of the other segments of our growing population.
3. I would like to see the following questions considered with new development both residential and commercial.
 - a. Potential traffic impact on roads and intersections at 1-10 mile radii from the proposed development.
 - b. At the time of the proposal what are the statistics on intersection accidents from 1-5 miles from the proposed development?
 - c. There should be a discussion on placement of the proposed buildings and parking with safety enhancement as the priority consideration.
Eg. The new Walmart at BeeRidge and Beneva which is consistently one of the highest accident/incident intersections in Sarasota County, SAFETY seemed to be left out or carry no priority in the development approval process. However, the 93 new jobs seemed to be the driving force for approval. The safety concerns should have carried weight in this process or at least been a

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	<p>consideration in the placement of the building and parking lot along with entrances and exits. With 300 residents signing a petition against the Walmart, safety and public input seems to not carry weight in the planning process. The May annual report on accidents at intersections will shed further light on this important consideration that must be included in such development considerations as growth further impacts on our health, safety and sustainability. I have learned that the County doesn't include intersections with I75 in their annual report of accidents at Co. intersections. FDOT has the data on I75 accidents and intersections in Sarasota Co. Therefore a complete picture of the impact isn't reflected in a user friendly modality. However, the impact of neglecting this important aspect has significant safety consequences. Please put this data together and use it for planning considerations. MPO, County, City and state officials should be coordinating and proactively pursuing this effort for all who live and visit here.</p> <ol style="list-style-type: none"> 4. Please elaborate on the types of reviewers for the Fiscal Neutrality Analysis. What is a "Qualified Professional and Peer"? There should be at least 3 reviewing and criteria for these reviewers indicated so that objective review is the goal. 5. A formula for adjustments to impact fees that also takes into account health, safety and sustainability is in order. <p>Thank you for your consideration.</p>
3/19/2015 Margaret Jean Cannon bruceandmargaret@comcast.net	<p>I am very concerned that current changes approved by the Commissioners are not in line with the stated purpose of land use, especially recreational use. I also believe that our infrastructure isn't up to speed with the growth and building currently approved by the Commissioners.</p>
3/19/2015 Christine Thurber Knupp Chrisstreet7@gmail.com	<p>I am asking you to draft the new Sarasota County Plan to protect native habitat and parks.</p> <p>If lands abutting Myakka Park, other wetlands, hammocks, and mangroves are not preserved our County will no longer be as attractive to tourists, birders, and fishermen; and land values will decrease. We do not need more strip malls and blacktop destroying our lands. We do not need to become another Dade County.</p> <p>We need to protect the limited wildlife that we currently have. We need to expand wildlife corridors for panthers and other large Florida mammals that still roam our lands. We need to protect the coastal waterways and mangroves so essential to our fishing industry, seabirds, and tourism. We need to preserve the wetlands that are found throughout our county to protect our water supply and sustain wildlife.</p> <p>We need to preserve what is left of Old Florida in Sarasota County.</p> <p>Respectfully submitted, Christine Knupp 1598 Landings Terrace, Sarasota, FI (permanent Florida resident)</p>
1/16/2015 Susan Schoettle-Gumm	<p>I would like to be placed on the email list for all information related to fiscal neutrality, including all documents, information distributed by the consultant and an</p>

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sschoettle@yahoo.com	y scheduled meetings/workshops, etc. Thanks.
12/21/2014 President Desoto Lakes Neighborhood Association desotolks@comcast.net	<p>As president of the Desoto Lakes Neighborhood Assn., I am very concerned about the potential negative impact which changes to "2050" will have on established neighborhoods. "Controlled growth" can help to maintain the pleasurable ambience to which Sarasotans have become accustomed; unbridled growth will turn our city into a pasture of urban sprawl and drive down the value of homes in established neighborhoods. It is of paramount importance that developers pay to maintain the "fiscal neutrality" of their projects. Mature neighborhoods within the USB should not need to pay for the infrastructure requirements of development beyond the USB to add to the profits of those developers.</p> <p>Neighborhoods, and the residents of those neighborhoods, should participate in all aspects of "2050", and any changes to that vision of Sarasota which is intended to take us (with minor adjustments, through the year 2050. Neighborhoods are the primary stakeholders and should be active participants in the planning process.</p> <p>Neighborhoods are the primary stakeholders in 2050 (including changes to "fiscal neutrality" currently under consideration) and should play a more active role than to just be provided a questionnaire for comments.</p>
12/6/2014 Michael Saba desotolks@comcast.net	Send the latest updates on fiscal neutrality reporting 2050 plans to interested parties as they occur.
11/24/2014 Cathy Antunes 2050 Action Network Cathy.antunes@comcast.net	<p>Thank you for the clarification you have provided regarding the status of 2050 fiscal neutrality policy creation and how the County is ensuring transparency and public participation. As I shared in my first e-mail, the members of our network see taxpayers are key stakeholders in fiscal neutrality policy creation, who deserve a prime seat at the policy creation table.</p> <p>We are interested in ensuring the following for citizens/taxpayers:</p> <ul style="list-style-type: none"> • Opportunity for input during the draft policy creation stage - public input solicited and incorporated from inception & forward • Access to fiscal neutrality meetings • Timely (real time/swift) access to policy creation information, including: <ul style="list-style-type: none"> - terminology, definitions being employed in policy creation - all methodology under consideration <p>When the County brought in NIGP to review procurement policy, NIGP gathered feedback from the public and incorporated the information into its policy review and recommendations. The public had a high degree of trust in their process and findings. The same approach would be welcome here.</p> <p>During a recent review of County records, I saw a report from AECOM reviewing the fiscal neutrality findings of Fishkind with regard to the Blackburn Creek development. Would it make sense to sit down as a group and review the Fishkind methodology along with AECOM's review of the Fischkind/Blackburn Creek analysis? As there is already some precedent here with fiscal neutrality as well as the work product of AECOM, it seems like a good idea to take a look at the findings and methodology of those reports.</p>

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	<p>You stated below "The county will have involvement in who may be selected for background/research interviews". Members of our groups would like to know who the County taps to advise on this process and what criteria is being used to select them. We'd like to have the County consider experts we recommend - professionals who we understand command a high level of public trust.</p> <p>As we have noted, It is the citizens of Sarasota County who will, after all, be responsible for resulting infrastructure costs if the fiscal neutrality methodology is lacking. Inequity in information or access undermines public confidence. Our goal is an open, transparent fiscal neutrality policy process which taps the best information available and is inclusive from the beginning.</p> <p>Member,</p>
11/22/2014 David Feagles FL Native Plant Soc. feaglesd@msn.com	<p>Thank you! This is an important first step in restoring trust with the public. It had appeared to many of us that our concerns were falling on deaf ears. I want to remain involved and look forward to opportunities for input and review.</p> <p>Director at Large</p>
11/21/2014	Comment submittal tracking initiated.