

June 03, 2025

To Whom It May Concern,

On behalf of the Town Council of Howey-in-the-Hills, please accept this letter as formal opposition to Application No. RZ-PZ2024-105, which proposes to rezone approximately 16.6 acres located in unincorporated Lake County from Agricultural (A) to Residential R-4. The subject property lies adjacent to the Town's gateway near the S.R. 19 bridge, within the Interlocal Service Boundary Agreement (ISBA) area, and is adjacent to existing Town limits.

After careful review of the application, citizen input, and staff analysis, the Town of Howey-inthe-Hills finds the proposed rezoning to be incompatible with surrounding land uses and inconsistent with the Town's adopted Comprehensive Plan. Specifically:

1. Incompatible Density and Lot Size - The proposed R-4 zoning allows for lot widths as narrow as 50 feet with minimal setbacks, which is in sharp contrast to the Town's adopted development standards. For example:

- The Town's Low Density Residential (LDR) future land use and corresponding zoning districts generally require larger minimum lot sizes and lower density, typically not exceeding 3 dwelling units per acre, often with wider lots and deeper setbacks.
- The proposed 49-lot layout (approx. 3 units/acre gross) undercuts the Town's intent to preserve rural and semi-rural residential character at its boundaries, particularly near key visual corridors such as the S.R. 19 entrance to Town.
- 2. Inconsistency with the Town's Comprehensive Plan The proposed rezoning conflicts with several goals, objectives, and policies of the Town's Comprehensive Plan, including:
 - Future Land Use Element, Objective 1.1: Encourage compact, compatible, and well-planned development that protects rural character.
 - Policy 1.1.6: New development adjacent to the Town's boundaries should be compatible in scale and intensity with existing development patterns.
 - Policy 1.1.7: The Town shall discourage uncoordinated, high-density development in areas without adequate infrastructure or land use compatibility.

The proposed rezoning from Agricultural to R-4 does not align with these policies, especially given the lack of utility coordination, inconsistent lot sizes, and its visual prominence at the Town's primary gateway.

3. Negative Gateway Aesthetic and Community Impact - The proposed development would establish a visually dense edge at the Town's entrance, creating a "tunnel effect" as described by local residents.

Town of Howey-in-the-Hills

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This density and design are not in keeping with the traditional open character of the Town's lakefront approach, and may create long-term community and aesthetic impacts, particularly near the lakefront and S.R. 19 bridge corridor.

<u>4. Infrastructure and Traffic Concerns</u> - Multiple residents and Council members expressed concern about the cumulative effect of this proposed rezoning on local traffic flow, especially near the already congested Savage Circle and S.R. 19 intersection, where turning delays and line-of-sight limitations pose safety concerns.

The County's application has not demonstrated adequate mitigation or coordination with the Town regarding roadway impacts, nor does it align with prior planning related to annexation infrastructure upgrades.

5. Failure to Coordinate Under the ISBA and Lack of Joint Planning - The parcel lies within the Howey-in-the-Hills Interlocal Service Boundary Area (ISBA)—a designated area intended to promote cooperative planning, infrastructure coordination, and consistent growth standards between the Town and County. However, the Town Council was not adequately engaged during the staff-level review process. Additionally, the record inaccurately reflected that the Town had "no comments," which has now been corrected through this letter.

The Town is open to future discussions about how to improve long-range coordination, whether through amendments to the ISBA or other frameworks such as a Joint Planning Agreement (JPA). Whatever the methods, it is essential that the County and the Town work together to define compatible densities, infrastructure responsibilities, and transitional land use expectations before development of this scale is approved in such a sensitive and visible location, adjacent to municipal boundaries. Proceeding with this rezoning before such coordination takes place undermines the intent of the ISBA and risks long-term land use conflicts.

<u>6. Public Opposition and Lack of Community Support</u> - Numerous residents and property owners—including the Cypress Point Homeowners Association—have voiced strong opposition to this rezoning. The Town Council echoed these concerns during its May 27, 2025 regular Town Council Meeting, where it reached unanimous consensus to formally oppose the application and pursue annexation strategies for the area to ensure more compatible development standards are applied.

<u>Conclusion</u> - For the reasons above, the Town of Howey-in-the-Hills respectfully requests that the Lake County Board of County Commissioners deny Application No. RZ-PZ2024-105. The proposed rezoning undermines the Town's established planning framework, introduces incompatible density at a critical gateway, and lacks the coordinated planning necessary for appropriate growth.

We strongly urge the County to delay action on this application until a Joint Planning Agreement can be negotiated between the County and the Town of Howey-in-the-Hills to ensure shared goals, compatible land use, and long-term planning success in the ISBA area.

We value our partnership with Lake County and look forward to working collaboratively on a better path forward.

Sincerely,

Sean O'Keefe

Town Manager

Town of Howey-in-the-Hills

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cc (via email):

Margaret Brock

Councilor Jon Arnold, Town of Howey-in-the-Hills

Councilor Tim Everline, Town of Howey-in-the-Hills

Councilor Reneé Lannaman, Town of Howey-in-the-Hills

Councilor David Miles, Town of Howey-in-the-Hills

Mayor Graham Wells, Town of Howey-in-the-Hills

Commissioner Leslie Campione, Chair of the Lake County Board of County Commissioners

Commissioner Timothy Morris, Lake County Board of County Commissioners

Commissioner Sean Parks, Lake County Board of County Commissioners

Commissioner Anthony Sabatini, Lake County Board of County Commissioners

Commissioner Kirby Smith, Lake County Board of County Commissioners

Shari Holt, Lake County Office of Planning & Zoning

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