

*DEFENDERS OF CROOKED LAKE,
INCORPORATED
P.O. Box 191
Babson Park, Florida 33827*

October 23, 2007

Department of Community Affairs
Division of Community Planning
Via fax and e-mail:
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City of Frostproof
111 West First Street
Frostproof, FL 33843

Re: Objections to City of Frostproof Plan Amendment LS-07-02; Crooked Lake

Dear Department of Community Affairs and City of Frostproof:

Please find these additional comments and information relevant to DCA review of the proposed City of Frostproof Comprehensive Plan Amendment.

The proposed land use change will increase the impervious surface on the parcel. This will decrease surface recharge rates, increase stormwater runoff decreasing stormwater quality. Urbanization of the area will decrease the time it takes for stormwater runoff to reach Crooked Lake. It will also reduce the aquifer recharge area and affect the quantity of water in Crooked Lake.

The sandy soils of the Lake Wales Ridge allow rain to drain, filter and recharge the deep Floridian aquifer, our primary source of drinking water. The Southwest Florida Water Management District estimates a 40 - foot drop in water levels of the underground Floridian aquifer just west of the Ridge since the 1940's.

Since 1991 Crooked Lake has been on SWFWMD's "Stressed Lake List" with chronic fluctuation below normal range of lake levels. This increase in use of underground water by the number of home sites proposed would lead to further drastic reduction of the level of Crooked Lake.

The proposed land use change is premature and exceeds the local government's present ability to service the area. As reflected in City minutes "City Planner Hetty Harmon gave her report and stated that the density of up to four units per acre would greatly impact services of fire, police and traffic. She recommended a lower density in this area to lower the impact."

The plan amendment fails under the majority of the indicators of urban sprawl and is detrimental to the surrounding natural resources such as Crooked Lake, aquifer recharge areas, and Polk County's Crooked Lake Prairie.

The **proposed amendment exhibits the characteristics of urban sprawl**. Our objections under the urban sprawl criteria of 9J-5.006(5)(G) F.A.C are set forth below in our previous objection letter dated September 28, 2007. Internal consistency with the duly adopted existing plan is required by ch. 163.3177 and 163.3187.

The proposed Comp Plan Amendment is internally inconsistent with Future Land Use Element **FLUE Objective 17 and Policy 17.1** prohibiting urban sprawl by expressly adopting the criteria of 9J-5.006(5)(G) F.A.C. into the local comprehensive plan. The proposed CPA does not represent a logical extension of services and growth as it encroaches into instead of away from less dense/less intense uses bordering Crooked Lake, leapfrogs across lakes and other areas without services and allows additional density and urbanized growth in a narrow serpentine pattern that is not significantly well-connected to the remainder of the urbanized areas within the City of Frostproof. Sufficient coordination with Polk County concerning proposed uses and services in this annexation has not occurred. **FLUE Policy 12.1**.

The proposed admendment is also internally inconsistent with FLUE Objective 3.1 protecting existing agricultural uses and natural resources and policies requiring the City to adopt agricultural land use districts to plan for, preserve and encourage existing agricultural uses within the City of Frostproof. **FLUE Policy 11.4; Policy 17.1; Capital Improvement Element CIE Policy 1.9**.

2 Developments by Bill Bair, The Ledger



Published Wednesday, August 15, 2007

“The Frostproof City Council transmitted proposed land use designations for two housing developments that could eventually triple the population of the city of 3,000. The western project would have up to 1,500 homes on 395 acres that are now citrus property adjacent to the county's Crooked Lake Prairie preserve on Breezy Point.

When the property was under Polk County zoning rules, each housing unit had to have a five-acre lot. The new land use district will allow four units on each acre. That difference means that 20 houses could be built on every five acres. This reflects an increase of 20 times over the amount allowable under the county's land use plan.

*The council, which has been eager to see growth, voted 3-1 in favor of the zoning designation, with Council member Kay Hutzelman opposing the measure. **Planning Consultant Hetty Harmon** also recommended denial, saying her "main concern" was traffic. She also recommended a lower housing density, noting the impact the project would have on police and fire services, and utilities.”*

Please recommend that the City not adopt the Plan Amendment as proposed, and find the proposed Comprehensive Plan Amendment not in compliance with 9J-5 and chapter 163, Florida Statutes.

Sincerely,

Defenders of Crooked Lake, Inc. and the following, as individuals and members of
Defenders of Crooked Lake, Inc:

Name: Address: