



Coalition of City Neighborhood Associations of Sarasota, Inc. – PO Box 1851 Sarasota, FL 34230
Sarasotaccna.org

Date: February 26, 2026

To: City of Sarasota Commissioners

Steve Cover, Director of Planning

Lucia Panica, Directory of Development Services

From: Board of Directors, Coalition of City Neighborhood Associations of Sarasota

Topic: Saravela Project: Supporting Staff Enforcement of Attainable Housing Bonus and Short-Term Rental Restrictions

We write to support and reinforce the work of city staff in their review of the proposed Saravela condominium development and its use of the Downtown Attainable Housing Density Bonus Program. Our goal is to ensure that staff have clear policy backing from the community as they enforce the City's Zoning Code, Florida Building Code requirements, and the intended purpose of the density bonus program.

The Saravela project proposes using the Attainable Housing Density Bonus to increase density while seeking approval for a 3-day minimum rental period.

We respectfully underscore three core areas where strong staff enforcement and clear policy direction are essential:

1. Zoning Code: Household Living vs. Transient Use Section II-304(b)(1) of the City Zoning Code defines "Household Living" as occupancy longer than one week and treats one week or less as transient lodging. The project appears to rely on these units being "dwelling units" to earn a fourfold density increase while also marketing and designing them as short-term transient rentals, a contradiction that staff are right to question and that we strongly encourage the City to resolve in favor of permanent housing consistent with the bonus program.
2. Building Code R-1/R-2 Separation and Attainable Unit Interspersion: Under the Florida Building Code, transient units (R-1) and permanent residential units (R-2) in the same building require physical separation, often by floor or fire-rated sections. This necessity directly conflicts with the density bonus requirement that attainable units be interspersed and indistinguishable from market-rate units across at least 50% of the development, and we support staff in insisting that any building design comply with both the separation requirements and the true interspersion of attainable units, not a de facto segregation of uses.

The purpose of the association is to protect and enhance city neighborhoods.

The coalition shall address the needs of neighborhoods and stand in support of these needs.



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3. Integrity and Precedent of the Density Bonus Program: The Attainable Housing Density Bonus Program was adopted to create permanent housing downtown, with density calculated in dwelling units per acre and attainable units committed for at least 30 years. If a project can receive bonus units beyond base density while operating a substantial portion of those units as transient lodging, the program risks being transformed into a mechanism for high-density short-term rental resorts, a precedent that would undermine neighborhood stability and contradict the City Commission's stated policy goals.

In light of these concerns, we respectfully support and encourage the following staff-centered actions:

- Uphold the more than 7-day minimum rental requirement for units counted as dwelling units under the density bonus, and confirm that units used as transient lodging cannot simultaneously qualify as dwelling units for bonus calculations.
- Require full compliance with the Florida Building Code including separation standards while preserving genuine interspersed and functional equivalence of attainable units as required by the density bonus program.
- Elevate any unresolved legal or policy conflicts to the City Commission for direction, and consider recommending amendments to the density bonus ordinance to explicitly limit bonus-counted units to permanent residential use, closing potential loopholes for future projects.

CCNA appreciates the diligence of Development Services and other departments in reviewing this complex and precedent-setting application. We stand firmly behind staff efforts to enforce the letter and spirit of the City's codes and look forward to working collaboratively to protect both the attainable housing program and the livability of downtown neighborhoods.

CCNA Board; Kelly Brown, President Jim Ludwig, 1st Vice President Ron Kashden, 2nd Vice President

Melinda Delpech, Daniel Frank, Beth Nothstine, Will Luera, Leslie Spangler

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