

Growth Management Department
Zoning Division, Comprehensive Planning Section
2800 North Horseshoe Drive, Naples, FL 34104 www.colliergov.net

Sent Via E-Mail

December 15, 2016

Mr. D. Wayne Arnold, AICP
Q. Grady Minor and Associates, P.A.
3800 Via Del Rey
Bonita Springs, FL 34134

and

Mr. Richard D. Yovanovich, Esq.
Coleman, Yovanovich and Koester, P.A.
4001 Tamiami Trail North, Suite 300
Naples, FL 34103

**RE: Sufficiency Review of Growth Management Plan Amendment Petition
PL20160002360/CP-2016-3, a large-scale amendment to the Goodlette/Pine Ridge
Commercial Infill Subdistrict for the Addition of Residential Use**

Dear Mr. Arnold and Mr. Yovanovich:

Thank you for your submittal of the Growth Management Plan Amendment (GMPA) Petition PL20160002360/CP-2016-3, a large-scale amendment to the Future Land Use Element (FLUE) to amend the Goodlette/Pine Ridge Commercial Infill Subdistrict text to add language that includes an additional use for residential. Pursuant to Paragraph B (ii) of Resolution No. 12-234, this letter serves to inform you that the above-referenced application is inadequate and insufficient to enable staff to conduct a formal [substantive] review. Below is the list of deficiencies that need to be corrected/addressed. Certain entries below correspond to the application form's numbers and letters. [In addition, application materials are lacking certain backup data that will be necessary for substantive review.]

Collier County Comprehensive Planning has found the petition insufficient for the following reasons:

Cover Letter Subject line - States the wrong PL # for this project. Please revise with **PL20160002360**.

Comprehensive Planning Comments related to the application form:

Page 1

I. B. – Please include contact phone number.

I.B1. – Please correct Richard Yovanovich's address and include phone number.

I.C. and I.C.1. – Please include contact phone numbers.

IV.B. – Page numbers are incorrectly referenced for the Goodlette/Pine Ridge Commercial Infill Subdistrict in the currently approved Future Land Use Element (FLUE) on pages 65 and 66. See additional staff comments under Exhibit IV.B.

Comprehensive Planning Comments on Application Backup Documents:

Exhibit IV.B – The title of this Subdistrict should be renamed, since it is proposed to include non-commercial uses, “Goodlette/Pine Ridge Mixed Use Subdistrict.” A title change will need to be included in the proposed text wherever the Subdistrict is mentioned in the FLUE (Policy 1.1, Urban Designation paragraph #12, Urban Commercial District paragraph #10, Future Land Use Map Series list). The Subdistrict would be more appropriately located in the FLUE under Future Land Use Designation Description Section, I. Urban Designation, A. Urban Mixed Use District.

Please correct the inserted text in the first and third paragraphs to capitalize the ‘S’ in Subdistrict. Please correct the spelling of “*stories* over parking” in this text and remove the hyphen.

If it is intended that residential density be calculated based upon total Subdistrict acreage, then this should be stated in the text.

Exhibit V.E. – On page 3 of 4 under “Parks: Community and Regional,” please revise the wording of the sentence, “No adverse impacts to Community or Regional Parks result from the *creation* of the Subdistrict.” This amendment is not *creating* a new Subdistrict, rather *amending* an existing Subdistrict.

Exhibit F. – “Location of Wellfields” Map should have legible street names, a north arrow and a scale. Please revise this map. This may necessitate enlarging this exhibit to 11” x 17” or dividing it into two or more sheets.

Market Study of Magnolia Square Apartments:

The Magnolia Square Apartments Maps on Pages 7 - 10 incorrectly show the Subdistrict boundary. (The PUD and Subdistrict boundaries are identical.) You can view the Goodlette-Pine Ridge Commercial Infill Subdistrict map on a Comprehensive Planning page (17th one down under “Other Flue Maps) towards the bottom of the page at <http://www.colliergov.net/your-government/divisions-a-e/comprehensive-planning/growth-management-plan-current-continued>.

The title on all 4 maps is identical and differences between what information is being shown is difficult to discern. Could they be retitled to distinguish one from another? We also suggest that all maps within this study include scales and north arrows. Please revise these maps.

Some maps depicting apartment complexes extend to the Lee County line while others do not, resulting in some projects not being depicted on some maps (reference pages 14 & 16 for example). Please rectify.

The study states the subject site is within the North Naples submarket but does not describe or provide a visual depiction of that area. Please provide.

The study does not indicate in what area there is demand for more apartments; is the demand in the North Naples submarket only or for some larger area? Please explain.

The study concludes that there is a demand for the proposed (400) apartments but does not quantify the demand. Is there a demand for only 400 units as proposed in this amendment, or for some greater number of units, and if so, how many? Please explain.

The study concludes there is demand but does not include an inventory of future apartment sites within the market study area (which area is unclear as noted above). Please provide an inventory of properties zoned and/or designated in FLUE to allow a rental apartment complex meeting the size threshold of ≥ 100 units with an analysis of each such property as to why/how it cannot fulfill some or all of the demand within the market study area.

The historical single family housing starts portrayed in the chart on page 11 only shows 2013-2016 by quarters. This is a fairly small sample. We suggest that you give information by year and not broken down by quarters, since the numbers do not show any definitive and significant quarterly pattern. On page 12, if single family housing starts are growing at a pace consistent with the population growth, what is the analysis of the pace of multi-family housing?

Why is single-family data provided since this petition is only seeking multi-family units?

Many of the numerous charts throughout this study lack labels for the axes. Please label.

The study did not describe and explain in the text how the figures in the charts were calculated. Please explain.

The study shows that there is an undersupply of rental units in Collier County, however there are no population projections for the “market rates” or other empirical data to demonstrate this is the appropriate location to meet the demand. The study only addresses need for multi-family rental units yet the proposed Subdistrict text does not limit to rental. Please revise Subdistrict text or the study to rectify this disconnect.

General comment: The petition did not address GMP amendment criteria found in Chapter 163.3177(6)(2) and (8), F.S. Please do so.

Stormwater and Environmental Planning Sufficiency Comments:

The application materials submitted are sufficient to enable staff to conduct a formal [substantive] review concerning environmental matters.

Transportation Planning Sufficiency Comments:

Collier County Transportation Planning staff has completed their review for completeness. The application materials submitted include a traffic study by Trebilcock Consulting Solutions, and would typically be sufficient for review.

Public Utilities Planning and Project Management Sufficiency Comments:

Collier County Public Utilities Planning & Project Management staff has completed their review for completeness. This application package is not adequate and sufficient to enable staff to conduct a formal [substantive] review concerning public utilities matters. The following comments need to be addressed:

Potable Water Section:

- a) Delete the sentence, "Raw water demand in 2013 was 35.5 mgd and by 2018 the demand county wide is projected to be 41.2 mgd."
- b) Describe the proposed amendment, which would add 400 multi-family dwelling units and not replacing 5 single-family homes with 100,000 sq. ft. of commercial space.
- c) Say "no significant impact" (consistent with the CIE) rather than "no impact."
- d) The LOSS for potable water is 150 gpcd and the average occupancy for Census Tract 102.12 is 1.8 persons per dwelling unit according to 2010 Census redistricting data. Use this information and a peak season multiplier of 1.2 to estimate demand. There is no LOSS associated with commercial space.

Sanitary Sewer Section:

- a) This Subdistrict is in the CCWSD north sewer service area. The second sentence misidentifies the FGUA as the service provider, and the third sentence misidentifies the north sewer service area as a regional sewer system.
- b) Say "no significant impact" (consistent with the CIE) rather than "no impact."
- c) The LOSS for wastewater is 100 gpcd and the average occupancy for Census Tract 102.12 is 1.8 persons per dwelling unit according to 2010 Census redistricting data [5,794 permanent population/3,235 total dwelling units]. Use this information and a peak season multiplier of 1.2 to estimate demand. There is no LOSS associated with commercial space.

Closing remarks:

Due to the original application being an electronic submission, no copies will be returned to you. Once the petition has been modified/enhanced to address the above items, re-submit the petition electronically for a second sufficiency review. Paragraph C. of Resolution No. 12-234 provides 30 days for you to respond to this letter with supplemental data.

Note that this is not a substantive review and that the substantive review will not be completed until this application has been found sufficient.

Should you have any questions, please feel free to contact me. Comprehensive Planning staff is available for assistance and will be happy to sit down with you and discuss this sufficiency review.

Kind Regards,

Sue Faulkner

Sue Faulkner,
Principal Planner

cc: Michael Bosi, AICP, Director, Zoning Division

David Weeks, AICP, Growth Management Manager, Comprehensive Planning Section

[CP-2016-3 Sufficiency Letter.docx](#)