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February 13, 2017

Ms. Sue Faulkner
Principal Planner
Collier County Growth Management Division/ Planning and Regulation
Land Development Services Department
Comprehensive Planning Section
2800 North Horseshoe Drive
Naples, FL 34104

RE: Collier County Growth Management Plan Amendment Application
PL20160002360, Goodlette/Pine Ridge Commercial Infill Subdistrict
Review 1 Response

Dear Ms. Faulkner:

This correspondence is our formal response to the sufficiency review letter provided to us on December 15, 2016. Responses to staff comments have been provided in **bold**.

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*.

Response:

The cover letter has been revised and is included with this submittal.

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.

Response:

Page one of the application has been revised as requested.

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.

Response:

The referenced page numbers have been corrected as requested.

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.

Response:

The inserted text has been revised as requested.

Please correct the spelling of “*stories* over parking” in this text and remove the hyphen.

Response:

The inserted text has been revised as requested.

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

Response:

The subdistrict is proposed to permit a maximum of 400 units within the 31± acre subdistrict. Providing a density calculation in the subdistrict text is unnecessary.

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.

Response:

Exhibit V.E. has been revised as requested.

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.

Response:

Exhibit F has been revised as requested and is included with this submittal.

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.

Response:

The Market Analysis has been revised as requested. The revised analysis is included in this resubmittal.

The Market Analysis is correct in only addressing multi-family rental as multi-family for sale is not contemplated.

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

Response:

The criteria found in Chapter 163.3177(6)(2) and (8), F.S. has been addressed and is included with this submittal.

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.

Response:

The LOS analysis has been revised as requested.

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.

Response:

The sewer analysis has been revised as requested.

Please feel free to contact me should you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Wayne Arnold". The signature is stylized with a large, sweeping "D" and a long, horizontal stroke extending to the right.

D. Wayne Arnold, AICP

c: David Genson
Richard D. Yovanovich
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