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June 14, 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 2 Response

Dear Ms. Faulkner:

This correspondence is our formal response to the sufficiency review letter provided to us on March 21, 2017. Responses to staff comments have been provided in **bold**.

Please note that the applicant has reduced the proposed number of rental units from 400 to 375. The application materials have been revised to reflect the 375 units; however the market analysis will continue to reflect the market demand for 400 dwelling units. The market analysis was modified to evaluate the feasibility of rental units and not fee simple or condominium multi-family dwelling units.

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

Comprehensive Planning Comments on Application Backup Document Exhibit IV.B:

- Page 3 of 6; Urban Designation b. Non-residential uses including: 12 – Please revise the existing title to “~~Goodlette/Pine Ridge Commercial Infill Subdistrict~~” and insert the new title “Goodlette/Pine Ridge Mixed Use Subdistrict” before “Henderson Creek Mixed Use Subdistrict”.
- Page 3 of 6; 19. Goodlette/Pine Ridge Mixed Use Subdistrict: Since the market study was very specific to recognize a demand for market rate apartments, please revise the proposed Subdistrict text, “The Subdistrict also permits *multi-family* residential dwelling units” to be more specific to “*apartments*” OR revise the market study to include fee simple multi-family units.

- Page 4 of 6; 19. Goodlette/Pine Ridge Mixed Use Subdistrict: Please revise 'multi-family' to 'apartments' in the next to last paragraph and anywhere else it is possible, unless the market study is revised to include fee simple multi-family units.

Response:

Page 3 has been revised as requested in the first bullet point.

The subdistrict text has been revised to state "multi-family rental dwelling units".

Comprehensive Planning Comments on Market Study of Magnolia Square Apartments:

- The study states the subject site is within the North Naples submarket/North Naples Planning District and refers to "market area" and "Collier County market," but does not describe or identify the market area. Is it the greater Naples Urban area north of US41/SR951 intersection as depicted on the maps in the study? Whatever the actual study area is, please provide a description or visual depiction.

Response:

A map showing the North Naples Planning Community is located in the revised report, along with the location of the Magnolia Square Property.

- 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.

Response:

Within the North Naples Planning Community, only the Imperial Lakes PUD, located north of the subject site, has approval for 430 multifamily sites. This limited supply, provides market support of the lack of properties where additional rental units could be developed.

- The study only addresses need for multi-family rental units yet the proposed Subdistrict text does not limit to rental. Please revise Subdistrict text to specifically limit to apartments OR revise the study to include and address fee simple multi-family units.

Response:

The subdistrict text has been revised to indicate that only rental units will be permitted.

- Page 30: A) Please explain why the rating is weighted as shown - age 15%, occupancy 50%, rent 35%; is this an industry standard? B) In the table of apartments, please include the missing Brittany Bay I & II apartments.

Response:

The weighing of each criteria for the market performance score, is based on the overall relationship of Price to Occupancy and how the properties age impact those economic factors. The weighting is based on the relevant importance of each factor.

Brittany Bay Apartments are not Market Rate, therefore they are not included in the analysis.

- Page 31: A) Please remove from legend the “less than 3” score as no apartment complex rated below 4.0 per the table on page 30. B) Please correct the color coding on the map for the several apartments that are incorrectly colored based upon their scores in the table on page 30.

Response:

The consultant believes that the entire score range should be included on the map as it provides support that the market rate apartments have higher pricing and are generally newer. The map has been revised in the report.

- Page 32: In first paragraph, for accuracy, suggest removing Aster at Lely and replace with San Marino (Aventine) – based upon the scores in the table on page 30.

Response:

The paragraph references the highest scored apartments based on their general location.

- Page 33: Table Column G lists the top of range at \$100K whereas the text twice lists \$99K; suggest rectifying for consistency.
- Page 36: Sec. 9.2, first paragraph, refers to “two most recently developed rental apartment complexes ... in the immediate area of the subject.” However, *three* complexes are then noted. Also, the first two complexes are roughly ten miles from the subject site and the third is about 3.5 miles away. Suggest revisions for accuracy.

Response:

The report has been revised.

Assistant Attorney’s Office Sufficiency Comments:

Collier County Assistant Attorney’s Office has completed their review for completeness. The following comments need to be addressed:

- Please provide the Goodlette/Pine Ridge Mixed Use Subdistrict Map (inset map)
- Page 1 of Exhibit IV.B.Amendment Text: Table of Contents: Please delete page “140.”

Response:

A copy of the inset map has been provided.

Page one of Exhibit IV.B has been revised and is included with this submittal.

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, looped "D" and a long, sweeping horizontal stroke at the end.

D. Wayne Arnold, AICP

c: David Genson
Richard D. Yovanovich
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