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June 4, 2018

Mr. Corby Schmidt, AICP  
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  
Petition PL20170004005/CP-2018-5, proposed Santa Barbara Boulevard/Golden Gate  
Parkway Commercial Subdistrict  
Review 1 Response

Dear Mr. Schmidt:

This correspondence is our formal response to the sufficiency review letter provided to us on May 1, 2018. Responses to staff comments have been provided in **bold**.

*Comprehensive Planning Comments related to the application form:*

- Generally, all documents referred to on the application form should consistently be either an "Attachment" or "Exhibit", but not some of both – so the reader can more easily locate them. Providing Attachments II.A and II.B, for example, as well as Exhibits V.A and V.B, can be confusing. All attachments or exhibits, in turn, must be labeled to match their corresponding application form entries.
- App item I.B.1. – Revise errors found in General "Contact" Information to provide accurate information.

**Response:**

**App item I.B.1. has been revised as requested.**

- App item III.E. – Acreage figure appears different here than other locations in application documents submitted. Review throughout, reconcile and revise as necessary.

**Response:**

**The acreage has been reconciled throughout.**

- App. item III.G. Entry provided is insufficient to describe a “surrounding land use pattern”. Prepare and attach a description of the surrounding land use pattern; and map the land use pattern [of actual land uses] in the “surrounding area”.

**Response:**

**App. Item III.G. has been revised to add “Please see Exhibit V.A”, which describes and shows the surrounding land use pattern.**

- App. item IV.D. Revise entry to provide page no., as the form requests.

**Response:**

**There are no page number listed on the maps in the Comprehensive Plan, therefore we are unable to put a page number on this map.**

- App. item IV.E. Revise “Create new subdistrict map” entry to read, “Santa Barbara Boulevard/Golden Gate Parkway Commercial Subdistrict Inset Map”, and provide (approximate) page no., as the form requests.

**Response:**

**App. Item IV.E. has been revised as requested. As there are no page numbers listed on the maps in the Comprehensive Plan, we are unable to provide an (approximate) page number.**

*Comprehensive Planning Comments related generally to all exhibits and attachments:*

- If an attachment or exhibit is referred to on the application form, i.e., application Section IV, item B, such documents should consistently be labeled as, Attachment or Exhibit IV.B. Other attachments or exhibits that are not specifically referred to on the application form may be labeled as, Attachments or Exhibits A, B, C and so forth. All attachments or exhibits, in turn, must be labeled to match their corresponding application form entries.
- All exhibits should be labeled for ease of finding and consistency throughout. Label first page of each exhibit/attachment [at top center, or in lower right-side corner] whether accompanied by a cover sheet or not. Also, include a tab for each exhibit, as a means of easily identifying and locating each exhibit when submitting paper copies.
- Show dates on exhibits reflecting their dates of preparation. Show the subject property location on map figures – preferably by outlining its shape and size to scale. Realize that the reviewers of this application will include lay persons, including members of the CCPC and BCC.

Double check all aerials and maps for properly oriented north arrow, names & locations of principal roadways, that subject property/boundary is outlined, for source and date of exhibit. Provide summary tables of existing land uses and existing zoning, and each FLUM designation appearing for subject property and adjacent lands.

**Response:**  
**Acknowledged.**

Comprehensive Planning Comments related to specific exhibits:

- Exhibit “IV.B” (Amendment Language).

*Staff observations, comments and suggested changes appear below. The County Attorney’s Office and Comprehensive Planning reviewers have provided recommendations for changes to proposed Subdistrict text, best viewed in their original hand-written mark-ups, which are provided separately and considered part of the recommendations herein. Further revisions may be recommended during subsequent reviews.*

Policy 1.5: The URBAN Future Land Use Designation shall include Future Land Use Districts and Subdistricts for:

A. URBAN - MIXED USE DISTRICT

\*\*\* \*\* text break \*\*\* \*\*

*[Replace full list of existing maps with text break]*

OBJECTIVE 5.2

\*\*\* \*\* text break \*\*\* \*\*

*[Missing is text revision to Policy 5.2.3, which prohibits additional commercial for properties on the segment of Golden Gate Parkway between Livingston Road and Santa Barbara Boulevard.]*

Policy 5.2.3:

[beginning page 8]

\*\*\* \*\* text break \*\*\* \*\*

B. Estates – Commercial District

[beginning page 30]

*[Recommendations for changes to proposed Subdistrict text, are provided separately. Refer to introductory notes above.]*

\*\*\* \*\* text break \*\*\* \*\*

FUTURE LAND USE MAP SERIES

Future Land Use Map

*[Replace list (as with list above) with text break]*

**Response:**

**Exhibit IV.B has been revised and is included with this submittal.**

- Specific proposed map ‘exhibits’ are absent. Provide a color Golden Gate Area-wide GGAMP map, and a black & white Subdistrict [GGAMP inset] map.

**Response:**

**A color Golden Gate Area-wide GGAMP map, Exhibit IV.D and a black & white inset map, Exhibit IV.E, have been prepared and are included with this submittal.**

- Exhibit “V.D”, Market Analysis:

Staff is unable to cull sufficient information from the initially-proposed “Market Analysis” to conduct a substantive review and provide our observations and comments. This Exhibit is incomplete, drafted more as compatibility statements and justifications for the combination of the intensities of C-3 commercial uses on same site with K thru 12 school students; a one-page demographic report is attached, along with a map indicating the beginnings of primary and secondary market areas. Revise and complete the Market Analysis as discussed below:

*Post Pre-Application Conference Notes reflect the apparent Comprehensive Planning issues presented by introducing a commercial subdistrict and establishing commercial uses; with the agent (and applicant) notified of the need to: provide the proper data & analysis for the introduction of commercial land uses; The market study is needed to establish demand for the commercial uses. These studies, even in their most basic form, include data on the: supply of land in the (market) area already having a GGAMP FLUM or FLUE designation allowing the desired uses; supply of land in the (market) area already having a zoning designation allowing the desired uses; inventory of existing commercial uses (acreage & floor area) in the (market) area; and, a professional acceptable analysis of the demand remaining for the desired uses.*

- *Need for the designation change – data and analysis, e.g. market demand study for commercial uses is to demonstrate the change is warranted, and that additional inventory [quantity] of the requested uses is needed; Too often, the data only demonstrates the petition site is viable for the proposed uses (“build it & they will come”) rather than demonstrate there is a need for a new or expanded GMP provision to provide for the proposed uses, and that the need is at this specific location; The data should be specific to the proposed land uses, proposed trade or service area, persons per household in subject area, etc., as applicable; Market demand studies should develop scenarios to explain how the subject property will compete with other ‘like areas’ in or near the market, or trade, area; Market demand studies should also gauge the amount of vacant units/square footage/leasable area of “like area” nodes in the market area, such as within each Mixed Use Activity Center (MUAC), each Estates Neighborhood Center, each Subdistrict, and so on – acknowledging the premise that*

*vacancies and vacancy rates are valid indicators for determining need/demand/support.*

**Response:**

**A revised Market Analysis has been prepared and is provided with this submittal.**

General Comments:

- Not found: Future Land Use Map and table illustrating and identifying land use designations for subject property & adjacent properties. Sufficiently map and report these land uses.

**Response:**

**A revised Market Analysis has been prepared and is provided with this submittal.**

- Include as attachments or exhibits and account for those items noted in the GMPA (*green sheet*) Post Pre-Application Meeting Notes not specified above, in particular:
  - Addressing the Statutory criteria for Plan amendments found in Chapters 163.3167(9), 163.3177 (6)(a) 2 and 8, and 163.3184, Florida Statutes.
  - A full Narrative Statement sufficient to address and support the proposed amendment, including why commercial uses should be allowed at this location contrary to GGAMP Policy 5.2.3. Provide full explanations of: all impacts to the surrounding area, giving particular attention to the Subdistrict and Overlay designations in this area that presently serve as buffers between non-residential and residential land uses; with their limited, transitional land uses (professional offices, low-intensity commercial, personal services, etc.) especially Transitional Uses in the Conditional Uses Subdistrict. To address and support the proposed amendment fully, this should include impacts from the proposed commercial development and high school, college, vocational, technical schools, business schools, and their ancillary services and facilities (ref. “full range of educational services”).

Include and explain any relevant information from the Golden Gate Area Master Plan Restudy.

Explain how the new Subdistrict affects the purposes and intents, etc. of each of the surrounding designations. Explain how the new (Subdistrict- and PUD-allowed) development affects the existing and potential development of uses in these designations, including, but not limited to:

- Appropriateness of uses/compatibility with surrounding area, and
- Impact or unintended consequences on surrounding properties – addressing whether it will make them more, or less, developable under their present FLUM designation? Address whether it create a domino effect leading to future designation changes on the surrounding properties.

**Response:**

**Please refer to "Chapter 163 Criteria" included with this submittal.**

*Stormwater and Environmental Planning Comments:*

Text amendment does not include any revisions related to environmental portions of GMP. Preserve will be required with [companion] PUD or CU petition.

**Response:**

**Acknowledged.**

*Transportation Planning Comments:*

The application is rejected, as additional items need to be addressed to enable staff to conduct a formal [substantive] review concerning Transportation Planning matters. Ten review corrections are commented upon, as follows:

- 1) The ITE trip generation data for Private School (K-12) LUC 536, AM and PM peak hour of adjacent street traffic, and for Charter School LUC 537, PM peak hour of adjacent street traffic, is limited. The sample size is small and the size of the proposed use is outside of the data extremes. Exhibit 4B of the Collier County TIS Guidelines indicates that local data collection is needed to support the trip generation rates. Alternatively, ITE trip generation data for Charter School LUC 537, AM and PM peak hour of the generator, has a significantly larger sample size of data available and the resulting trip generation rate equations have a higher correlation to the data.

**Response:**

**It was discussed with the reviewer that ITE's PM peak hour of the generator trips mostly occur before 4 PM. Therefore, a 50% reduction in PM peak hour results was an appropriate adjustment to reflect the school's 4-6 PM site-generated traffic demands.**

- 2) Project traffic volumes are missing from Figure 2A.

**Response:**

**Figure 2A provides traffic distribution by percentage and remains unchanged. The revised TIS has Figure 2B that depicts the traffic assignments.**

- 3) Address the traffic impact during the AM peak hour. The trip generation during the AM peak is 1,585 vph and is 1,000 vph higher than the PM peak hour trip generation.

**Response:**

**To be addressed at the time of subsequent submittals.**

- 4) What is the impact of the net new and diverted pass-by trips on the intersection of Golden Gate Parkway and Santa Barbara Boulevard during the AM and PM peak hours? Can the intersection be reasonably expanded to accommodate the increase in turning movements? Provide a comparison of the background turning movement projections to the build-out turning movement projections (including project trips, background trips and diverted pass-by trips) for the AM and PM peak hours.

**Response:**

**To be addressed at the time of subsequent submittals.**

- 5) Does Figure 2A include pass-by trips? Why are no trips assigned to I-75?

**Response:**

**See response to comment 2. Trips were assigned to I-75 as suggested.**

- 6) The pass-by capture rate for LUC 960 exceeds the maximum rate of 50% for this category per the Collier County TIS Guidelines.

**Response:**

**JMB disagrees that the ITE or FDOT established pass-by rates cannot be used, but the TIS was revised as requested.**

- 7) The combined pass-by trip capture for the site during the AM and PM peak hours is 765 vph and 519 vph respectively. Both of these values exceed the maximum site pass-by capture rate of 25% of the project's external trip generating potential and possibly 10% of the background traffic on the adjacent roadway per the Collier County TIS Guidelines.

**Response:**

**Pass-by trips have been revised.**

- 8) The number of pass-by trips should be equally split between the inbound and outbound trips.

**Response:**

**JMB disagrees that the pass-by trips occur equally within the same hour, but they should be close to a 50/50 split. The inbound/outbound direction of travel should also be close to a 50/50 split.**

- 9) Verify all trip generation calculations. The Enter/Exit split for LUC 537 in the PM peak should be 69/127. Table 1 shows 84/112.

**Response:**

**The TIS was revised which includes a 15% shared commercial/school trip. That is, 15% of the total "new" commercial trips were estimated to be a shared trip generated by the school.**

10) Provide copy of methodology meeting notes.

**Response:**

**The TIS methodology was not previously established, by default the first review and follow-up discussions with staff represent the established methodology.**

*Public Utilities Planning and Project Management Comments:*

The application is rejected, as additional items need to be addressed to enable staff to conduct a formal [substantive] review concerning public utilities matters. Two review corrections are commented upon, as follows:

- 1) Per GMP/CIE Policy 1.5, the potable water and wastewater treatment system LOS standards are based on population. Non-residential development does not facilitate population growth. So, the proposed uses will have no impact on potable water facility or wastewater treatment system capacity. Revise the "Potable Water" and "Sanitary Sewer" sections of Exhibit V.E "Public Facilities Level of Service Analysis" accordingly.
- 2) The project is located in the Golden Gate City sub-regional wastewater service area of the Collier County Water-Sewer District. Revise the "Sanitary Sewer" section of Exhibit V.E "Public Facilities Level of Service Analysis" accordingly.

**Response:**

**The Public Facilities LOS Analysis has been revised to correct the water-sewer District and to remove the non-residential calculations from the analysis.**

*Collier County Attorney's Office Comments:*

The County Attorney's Office has reviewed this proposed 2018 Cycle One, large-scale GMPA petition.

Reviewers point out that the application's disclosure of ownership lists the owners as Goodwill Industries of Southwest Florida, Inc. and Naples Christian Academy Association, Inc. The disclosure of ownership lists the owners as Goodwill Industries of Southwest Florida, Inc. and MG3 Developer Group, LLC. Revise or explain why [the listings] are different.

**Response:**

**The application has been revised, a copy is included with this submittal. Please disregard Exhibit II as the correct information is provided in the application document.**



Mr. Corby Schmidt, AICP

RE: Petition PL20170004005/ CP-2018-5, proposed Santa Barbara Boulevard/Golden Gate Parkway Commercial  
Subdistrict; Review 1 Response

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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  
GradyMinor File