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March 20, 2019

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 4 Response

Dear Mr. Schmidt:

This correspondence is our formal response to the sufficiency review letter provided to us on February 19, 2019. Responses to staff comments have been provided in **bold**.

Rejected Review: Comprehensive Planning Review

Reviewed By: Corby Schmidt

Email: corbyschmidt@colliergov.net Phone #: (239) 252-2944

Correction Comment 1:

Miscellaneous Corrections

All other Review Correction Comments must be individually addressed by the applicant and resolved before Comprehensive Planning Review staff may determine the outcome of the overall review to be "sufficient".

Response:

Acknowledged.

In Staff's previous sufficiency letter, staff remarked, the Submittal 2, "Statutory Criteria for Plan Amendments" narrative does not appear 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., and a number of other GMP objectives and policies. Portions of the

narrative are provided in revised data and analysis, the Submittal 4 Exhibit V.E., Public Facilities Level of Service Analysis (rev 3 - dated January 7, 2019). Additional portions of the narrative are provided in revised data and analysis, the Submittal 4 exhibit, Comprehensive Plan Consistency (rev 3 exhibit - dated December 6, 2018).

These materials still do not provide staff with the support they had desired to support the proposed amendment, and you are encouraged to use this time to add additional data and analysis to your application. Ensure application materials provide full explanations of all impacts to the surrounding area. Give 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.

Address 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 the:

- appropriateness of uses/compatibility with surrounding area, and
- impacts and unintended consequences on surrounding properties – addressing whether it will make them more, or less, developable under their present FLUM designations, and showing how the approval of this request will not create a domino effect leading to future designation changes on the surrounding properties.

Response:

The Statutory Criteria for Plan Amendments and the Comprehensive Plan Consistency have been revised to address staffs comment.

Rejected Review: County Attorney Review

Reviewed By: Heidi Ashton-Cicko

Email: heidiashton@colliergov.net Phone #: (239) 252-8773

Correction Comment 4:

Miscellaneous Corrections: new affidavit: CSG Group LLC is not listed as the manager of BCHD Partners III, LLC in the online records of the Department of State. Please provide proof that CSG Group LLC is the managing entity of BCHD Partners III, LLC. [If CSG Group, LLC is the managing entity: please complete the name of its managing entity, Barron Collier Management, on the affidavit by adding LLC]

Response:

A copy of the updated 2019 Annual Report for BCHDP III, LLC, which now reflects CSG Group, LLC as the Manager is included with this submittal.

Rejected Review: Transportation Planning

Review Reviewed By: Michael Sawyer

Email: michaelsawyer@colliergov.net Phone #: (239) 252-2926

Correction Comment 3:

Additional Items that need to be addressed for Transportation Operations Review:

Rev.4: New review comment due to recent submittal and review of companion PUD document; which is not consistent with the TIS provided for both GMPA and PUD petition. The use scenario provided in the TIS apparently represents what is now only potentially possible for development and not fully represent the highest-best-most traffic generation possible for this development.

This causes concern for both the GMPA as well as the PUD. This use issue must be addressed consistently across both petitions. Please also make sure that all review comments provided with the PUD petition are continued with this review as needed.

Response:

The TIS is based upon what could be the most-intense land uses that might be developed from a wide range of land uses that are being proposed. It is not possible for the TIS to reflect all the potential uses, but rather evaluates the most intense. A trip cap will be established that will ensure that the TIS's estimated maximum intensity is not exceeded

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