



Collier County Master Mobility Plan Phase III Working Draft #1
Conservancy of Southwest Florida Comments
Submitted 4-11-12

MMP PHASE III RECOMMENDATION 1:

Use impact/mobility fee incentives based on calculated reductions generated by providing optimal employment to population ratios and a full range of housing types and affordability that result in reduced commuter-related trips, both within specific mixed-use developments and within large sub-areas.

CONSERVANCY COMMENT 1:

While incentives can prove to be a compelling motivator for guiding development in a manner that will provide benefits to the entire County through reduction of Vehicle Miles Traveled (VMT), the Conservancy would recommend that incentives be balanced with additional regulations and disincentives. Regulations provide assurances that minimum VMT reduction policies are met. Disincentives would serve the purpose of guiding projects, from a mobility perspective, in a direction aligned with sustainability and connectivity, without creating an outright prohibition on an individual developer choosing not to participate. However, if the developer does not participate, there could be additional costs or regulations imposed.

CONSERVANCY COMMENT 2:

The applicability of this recommendation is proposed to be countywide, which could be appropriate if the policies pursued do in fact address mobility both within and external to the project and address the very different planning issues within the various Master Mobility Plan (MMP) sub areas. However, the draft policies, as currently written, we believe are too broad-based and do not sufficiently address mobility within these sub areas.

The key concept for Growth Management Plan (GMP) changes based on this recommendation is creation of standards for Low Vehicle Miles Traveled Development (LVMTD), which would be designed to reduce the need to travel, reduce the length of

trips or encourage/facilitate the use of alternative modes. If a project, which could potentially be as small as an urban Planned Unit Development (PUD), to as large as a new SRA, meets the LVMTD criteria as established in the LDC, it could be eligible for benefits such as reduced impact fees.

For the Coastal Urban Area (CUA), one of the sub areas identified in the MMP, the Conservancy agrees that such incentives could be beneficial, since today there is little the County can do to require developments to be designed for high internal capture rates. In addition, the CUA has an extensive road network that, in many instances, is built out to its maximum width. Therefore, creative ways to keep residents within their community for at least some of their trips, or to design alternative modes for residents to travel outside their community, could be beneficial.

At the opposite end of the County, there is the Rural Lands Stewardship Area (RLSA), containing approximately 195,000 acres of land primarily used for agricultural purposes and sparsely populated. The road network contains both State and County roads, predominantly two-lane and rural. The infrastructure in this area is not currently configured to accommodate the heavy use of urban traffic. The exception is, of course, Oil Well Road, which is being widened to create a connection between the new SRA town of Ave Maria and the CUA.

If the RLSA is built-out as anticipated in the GMP, the 5,000 acre town of Ave Maria will be joined by approximately 40,000 additional acres of new urban towns and villages, located within the 95,000 acre envelope of the RLSA Open Lands. However, unlike the CUA, where there are no strict requirements to have a sufficient mix of uses internal to the project, the RLSA *requires* that new SRAs provide a sufficient mix of residential, commercial, retail and employment uses.

Such a demonstration is necessary, or an SRA is not (or at least should not) be approved. If SRAs are not operating in this manner, or if the County believes additional requirements should be in place to maximize self-sufficiency and reduce VMT internal to the project, then these requirements should be moved forward as an amendment to the RLSA, not through additional incentives as part of new countywide policies.

Development within the RLSA creates challenges for the County that are very different from the considerations given to the CUA and other sub areas. The Conservancy believes that the key concern within SRAs from a MMP perspective should not be improvements on the internal design, which is already required to be sustainable, but should be focused on the reality that such projects so far from the urban areas *will* have

a significant impact on rural roads that connect them to urban Collier County. The VMT from residents driving from remote new towns into the UCA must be examined.

The necessity to create incentives which specifically target each of the sub-areas is highlighted by the map prepared by the landowners' consultants of the extensive transportation infrastructure project that they believe will be necessary when the RLSA is built out (See Attachment 1). This map indicated that most of the currently rural roads in the RLSA will need to be expanded and new roads constructed in order to accommodate approximately 45,000 acres of new urban development in eastern Collier County. Considering the significant increase to VMT that this vision map represents, any incentives developed as a result of this recommendation must specifically target achieved reductions in demand for such a road network in the RLSA.

With regard to the other sub areas within the MMP – Golden Gate Estates, Rural Fringe Mixed-Use District, Orange Tree and the Immokalee Urban Area – the Conservancy believes that they also should be assessed on a sub area basis to see what types of incentives would best serve to reduce VMT and make more sustainable communities, instead of putting them in with a one-policy-fits-all approach.

CONSERVANCY COMMENT 3:

Another incentive proposed for projects qualifying as LVMTD is a reduction in the minimum open space requirements.

Collier County's open space requirements currently ensure new developments provide adequate greenspace to residents including native vegetation preserves, conservation areas, and recreational facilities like parks and nature trails. Open and green spaces, even in urban environments, have been shown to increase property values and improve the mental and physical health of residents. Although preserves and native vegetation are sometimes isolated in urban infill locations, they still provide essential services like water quality treatment and aquifer recharge.

Perhaps most apropos of the MMP goals is the ability of open space requirements to encourage clustered development. In fact, the MMP's Phase II Final Report spoke to the necessity of providing more clustered development patterns in Collier County and Section 2 specifically identified compact mixed-use development as one of the most important currently available planning tools in the RLSA and RFMUD in order to decrease VMT. In this way, open space requirements will also serve to reduce the County's costs of providing services like water, sewer and roads to new developments by reducing the area to be served. Current open space requirements in Collier County do not extinguish any development rights but allow the same amount of development while also encouraging the application of smart growth principles.

Given the many benefits realized by the community, the value of open space cannot be over-estimated. Given the compatibility of open space and clustered development

requirements with the goals of the MMP, one would expect to see disincentives for conventional development with decreased open space rather than provisions to reduce the use of such a valuable planning tool. It is unclear how reduced open space requirements as an incentive for designing LVMTD communities furthers the MMP's goal of reducing VMT. With this in mind, the Conservancy suggests reconsidering the inclusion of reduced open space requirements as an incentive for meeting LVMTD requirements.

RECOMMENDATION 2:

Recommend that the BCC appoint an advisory board or task force to be comprised only of residents or property owners within Golden Gate Estates to evaluate all viable tools and programs to reduce density in North Golden Gate Estates.

CONSERVANCY COMMENT:

The Collier County Planning Commission (CCPC) recommended that this advisory board be comprised of only residents and property owners in Golden Gate Estates. Staff has not agreed with this recommendation, and it is unclear if the Board of County Commissioners (BCC) will place such a restriction on this committee. However, staff is recommending that this effort be combined with the transfer of development rights (TDR) discussion that was an outcome of the Watershed Management Plan (WMP) process. The Conservancy believes this would be a logical combination, but we want to make sure it is understood that the WMP TDR discussion did not anticipate any restriction for a future stakeholder committee and thus, if the MMP and WMP efforts are to be combined, there should not be a restriction on the make-up of the committee.

RECOMMENDATION 3:

Incentivize approved neighborhood-serving retail and service uses in GGE, RFMUD Receiving Areas, and Orange Tree to reduce trip lengths for neighborhood serving uses.

CONSERVANCY COMMENT:

One of the policy recommendations is to allow incentives to increase the maximum density for RFMUD Villages from 3 to 4.5 units per acre. The Conservancy supports increasing density as a mechanism to make alternative transportation a realistic concept. However, has analysis been done to determine that 4.5 units per acre will be sufficient for achieving the desired VMT and sustainability concepts? In addition, since alternative modes of transportation often are dependent on a specific minimum density, should the County also be examining what the necessary minimum density should be? The Conservancy believes that both maximum and minimum densities are critical

factors and both should be closely examined to make sure the proper numbers are in place.

RECOMMENDATION 4:

Review and revisit requirements that already exist for self-sustaining Towns and Villages within the RLSA/RFMUD Receiving Areas to provide for internal capture and use of alternative modes.

CONSERVANCY COMMENT:

No changes to the GMP were proposed. However, as the Conservancy stated above, this does not address the issue of how these towns connect with areas outside their boundaries, specifically the CUA and how this impacts VMT.

The LDC amendments described by this section indicate that the Mobility Analysis will be required in addition to a Traffic Impact Statement (TIS). Again, it will be important to remember that multi-modal developments will effect VMT to very different degrees depending on whether the development is located in the rural or urban areas of the county, and the Mobility Analysis will need to be sensitive to those differences.

RECOMMENDATION 5:

Revisit policies within the Urban Area to encourage: A) and further incentivize infill and redevelopment; B) internal capture; and C) Use of alternative modes within localized mixed-use developments.

CONSERVANCY COMMENT 1:

The term Transit Oriented Development (TOD) is used often, and density/intensity bonuses and increases are contemplated for TODs. However, a TOD has certain elements essential to it, one being a minimum level of density much higher than we are used to in this County. For suburban TOD, the FDOT suggests 5-10 du/ac. For Urban areas, these densities are even higher. In order to ensure these incentives are not simply allowing more development, and are in fact actually providing the TOD benefits, examination of what minimum densities are needed should be done. If the County is not willing to set these higher minimum densities, then TOD incentives should be reexamined.

CONSERVANCY COMMENT 2:

This section also will allow commercial uses in the urban area to encroach on preserves up to 3 additional acres, if they show reduction of VMT. Preserves are set aside for a number of purposes – aesthetic, water filtration, habitat “pockets”. There currently are LDC policies that allow for very small commercial parcel to mitigate their preserve requirements off-site. The Conservancy would strongly suggest that this policy be further refined to apply only to small commercial sites, where preserves are 2 acres or less in size, which corresponds to LDC Section 3.05.07.H.1.f.i.a.

RECOMMENDATION 15:

Through regular and ongoing communication and coordination between Collier County and regulatory agencies and stakeholders, identify opportunities and implement strategies to enhance efficiency and reduce costs of the permitting process. This objective should be accomplished while balancing the protection of water, wildlife, other natural resources and private property rights, and with consideration for a particular sub-area’s socio-economic characteristics.

CONSERVANCY COMMENT:

The description and examples for this recommendation states that the County will, “Plan for the Florida panther and other listed species”, and that the County will, “Pursue a fast-track program with outside agencies for projects that support mobility”. The Conservancy would like additional details and clarification as to what these examples mean and how language to further these objectives will be stated in the GMP and/or LDC.

RECOMMENDATION 16:

Use the mitigation cost component of the County’s current roadway impact fee or future mobility fee to fund specifically identified mitigation strategies.

CONSERVANCY COMMENT:

The proposed policy language states, “...identifies strategic improvement that can be or are to be used...” The Conservancy asks that this policy language be clarified as to whether this is an option or a requirement.