

MEMORANDUM

TO: *Collier County Comprehensive Planning Review Staff*
FROM: *Tim Hancock, AICP*
RE: *Additional Commercial Land Inventory Data, PL-20120002909/CP-2013-3*

October 3, 2013

Part of the application for GMP Amendment related to the Buckley Mixed Use District was an analysis of existing commercial inventory within a one to three mile radius of the subject site, with the primary focus being on those properties within two miles. The basis for this analysis was to show the lack of availability of zoned, 'developer ready' sites within that area and particularly the Airport Road corridor as a basis for the petitioner's position that there is inadequate supply to meet this particular demand. The demand side of the analysis was supported with elements of the Bergstrom Report included with the application which showed that end-user retail starts are increasing and showing higher demand than other commercial sectors. This is also anecdotally supported by the new construction of commercial end-users in the Pine Air Lakes project. The petitioner contends that the demand is growing, but the supply is dwindling and nearly non-existent in near proximity to the subject property.

Staff included in their report an analysis of the available square footage, both built and available in the project area. Due to a short review time frame, staff was limited to analyzing the projects based on the submitted annual PUD monitoring reports and came to the conclusion that the supply was more than adequate to meet the future demand.

The petitioner responding with a site specific analysis at the Planning Commission hearing that identified all available sites within a two mile radius of the subject property, using project aerials and site visits to confirm availability. That updated data is included as Exhibit A. Further data addressing the staff analysis is also attached as Exhibit B.

Also providing testimony at the Planning Commission was Mr. David Stevens, a commercial property broker with more than 20 years' experience in the local market. Mr. Stevens confirmed that the demand for end-user retail was present and growing and provided further testimony that vacant land within a 2-mile radius of the site was scarce. His testimony further indicated that most of not all of the 26 vacant, commercially zoned acreage within the Pine Air Lakes project was 'spoken for' and therefore not available, reducing the available acreage even further than shown by the applicant. Mr. Stevens then noted that projects such as the recent purchase of the

Temple Citrus Groves property which will bring some 500 new homes to the area will be cause for increased demand in the future and only exacerbate the issue of minimal supply for this type of commercial property. It was Mr. Stevens's testimony that the Buckley project will fill a demonstrated need for commercial, end-user parcels in the project area.

End of Memo.

EXHIBIT A

COMMERCIAL PROPERTIES INVENTORY LISTING AND MAPS



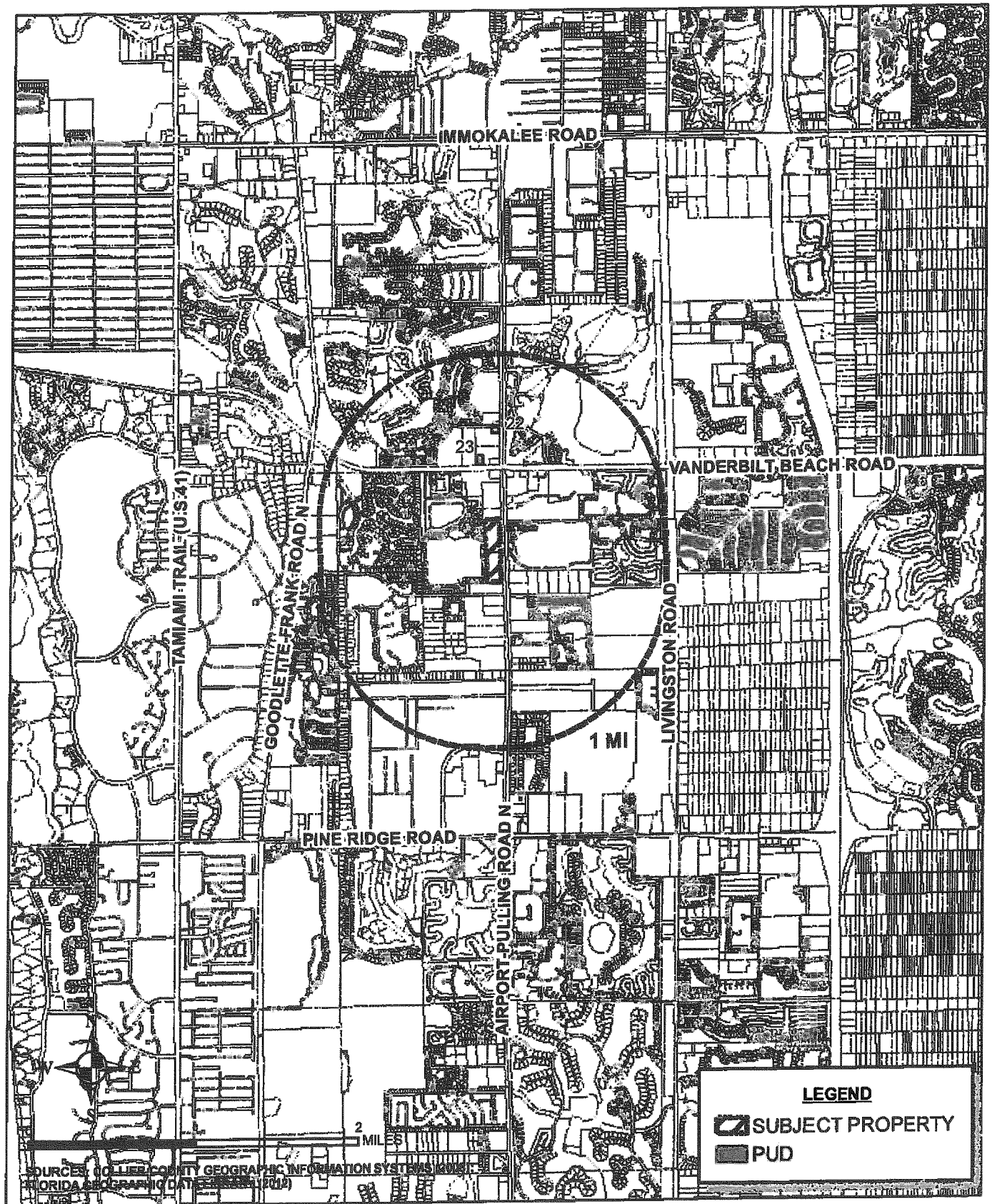
EXHIBIT Q - COMMERCIAL PROPERTIES

UNDEVELOPED C-3, C-4 and PUD ZONED PROPERTIES WITHIN 1 MILE RADIUS							
ZONING	PUD/DEVELOPMENT NAME	ACTIVE/SUNSET	PARCEL NUMBER	ACREAGE	TRAVEL DISTANCE FROM SUBJECT PROPERTY	APPLICABLE/NON-APPLICABLE	USES PERMITTED
22	PUD	ACTIVE	34569500020	0.90	1.4 MI	HAS FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY	C-4 USES
23	PUD	ACTIVE		1.37	1.1 MI	HAS FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY	C-4 USES
UNDEVELOPED C-3, C-4 and PUD ZONED PROPERTIES WITHIN 2 MILE RADIUS							
1	CPUD	ACTIVE	66760010345	1.09	1.8 MI	NO FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY.	C-4 USES
2	CPUD	ACTIVE	66760001723	8.89	1.8 MI	NO FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY.	C-4 USES
3	CPUD	ACTIVE	66760013025	4.68	1.8 MI	NO FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY.	C-4 USES
4	CPUD	ACTIVE	66760013041	11.36	1.8 MI	NO FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY.	C-4 USES
5	CPUD	ACTIVE	38450040006	10.56	3.1 MI	HAS FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY	C-4 USES
	CPUD	ACTIVE	38450041005		3.1 MI	HAS FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY	C-4 USES
	CPUD	ACTIVE	38451000003		3.1 MI	HAS FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY	C-4 USES
6	MPUD	ACTIVE	00203042108	9.04	1.6 MI	HAS FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY.	C-3 USES
7	PUD	ACTIVE	00240280101	3.94	3.1 MI	HAS FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY.	C-3 USES
8	PUD	ACTIVE	61789000043	1.85	3.6 MI	HAS FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY.	C-4 USES



UNDEVELOPED C-3, C-4 and PUD ZONED PROPERTIES WITHIN 3 MILE RADIUS

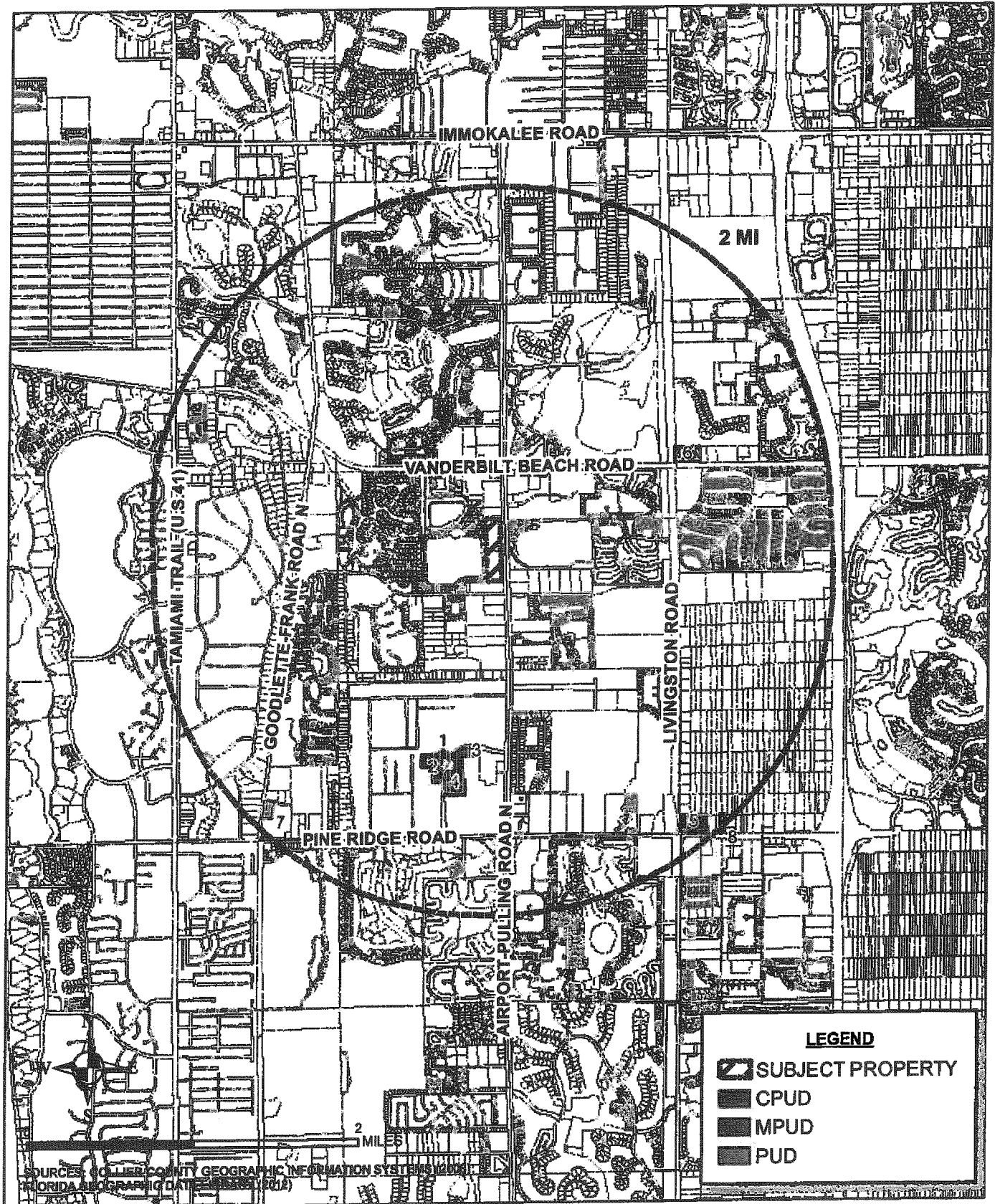
9	CPUD	CREEKSIDE COMMERCE PARK	ACTIVE	29331190725	1.33	3.4 MI	HAS FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY.	C-3 USES
10	CPUD	CREEKSIDE COMMERCE PARK	ACTIVE	29331193201	1.61	3.4 MI	HAS FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY.	C-3 USES
11	CPUD	CREEKSIDE COMMERCE PARK	ACTIVE	29331193188	2.04	3.4 MI	HAS FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY.	C-3 USES
12	CPUD	CREEKSIDE COMMERCE PARK	ACTIVE	00168044005	21.94	3.4 MI	HAS FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY.	C-3 USES
13	CPUD	GASPAR STATION	ACTIVE	34595001027	12.07	3.9 MI	HAS FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY.	C-4 USES
14	CPUD	CLESEN	ACTIVE	38456200002	4.19	4.3 MI	HAS FRONTAGE ON ARTERIAL OR COLLECTOR, BUT NO ACCESS.	C-4 USES
15	CPUD	PINE VIEW	ACTIVE	00287560004	5.65	3.5 MI	VACANT PARCELS HAVE NO FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY.	C-4 USES
	CPUD	PINE VIEW	ACTIVE	00287160006		3.5 MI	VACANT PARCELS HAVE NO FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY.	C-4 USES
16	MPUD	MALIBU LAKES	ACTIVE	24745000545	1.50	4.7 MI	HAS FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY.	C-4 USES
17	PUD	PINE RIDGE CORNERS	SUNSET	38455040001	4.22	4.3 MI	PUD IS SUNSET. HAS FRONTAGE ON ARTERIAL OR COLLECTOR, BUT NO ACCESS.	C-4 USES
18	PUD	ANGILERI	SUNSET	38454000000	2.24	3.5 MI	PUD IS SUNSET.	C-4 USES
	PUD	RAGGE	SUNSET	76715000028	3.60	3.5 MI	PUD IS SUNSET.	C-4 USES
PUD	RAGGE	SUNSET	76715000044	3.5 MI		PUD IS SUNSET.	C-4 USES	
20	PUD	PINE RIDGE CENTER WEST	ACTIVE	76720001546	4.15	3.1 MI	HAS FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY.	C-4 USES
21	C-4	NAPLES TWIN LAKES	ACTIVE	63400040005	1.32	4.4 MI	HAS FRONTAGE ON ARTERIAL OR COLLECTOR ROADWAY.	C-4 USES



SOURCES: COLLIER COUNTY GEOGRAPHIC INFORMATION SYSTEMS; FLORIDA GEOGRAPHIC DATA CENTER (2012)

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BUCKLEY GMPA
 EXHIBIT Q: VACANT COMMERCIAL PROPERTIES
 ZONED C-3, C-4 & PUD (WITHIN 1 MILE)



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BUCKLEY GMPA
 EXHIBIT Q: VACANT COMMERCIAL PROPERTIES
 ZONED C-3, C-4 & PUD (WITHIN 2 MILES)

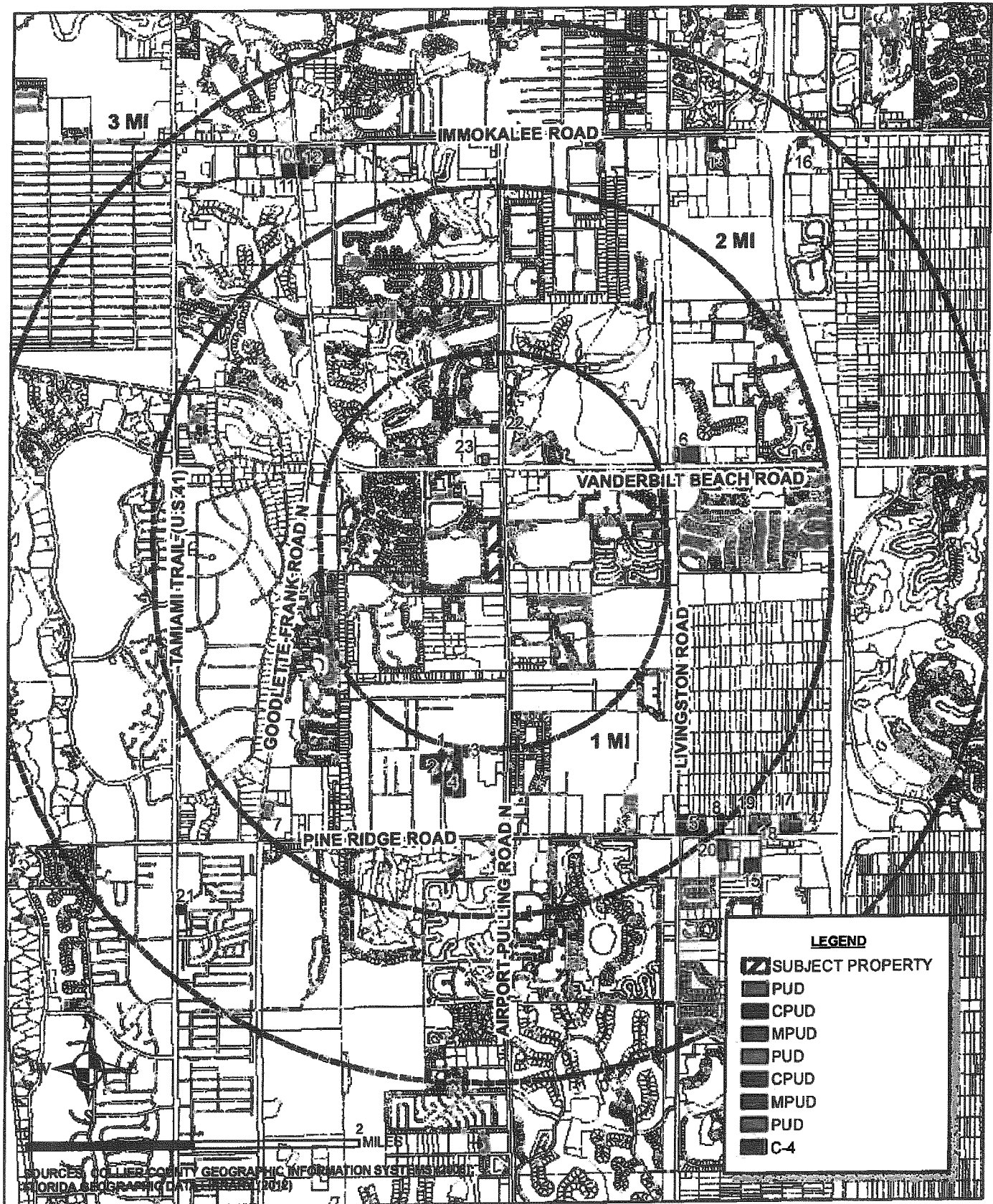


EXHIBIT B

ADDITIONAL LAND USE ANALYSIS IN RESPONSE TO COLLIER COUNTY STAFF REPORT
9-27-2013

Point 1: Staff contends that relevant examples exist within the Collier County of successful Mixed Use Developments that allow for the conclusion that mixed use can be creatively applied to the subject property.

Response: With regard to the mixed use requirement, Collier County Comprehensive Planning staff on page 5 of their staff report points to varying types of mixed use developments as 'working' examples of successful mixed use projects in Collier County. Many of these projects however are not comparable in nature to the Buckley sites.

1. Staff first points to the Town Center components in Village Walk, Island Walk and Verona Walk communities. These are predominantly residential communities with small commercial amenities that exist for the use and benefit of solely their residents. The general public does not have use of these facilities and they are very limited in their size and scope.

2. Staff then cites 5th Avenue South and 3rd Street South as examples of why mixed use could work on this site. Unlike the subject property, 5th avenue and 3rd street are public thorough-fares and part of a grid system of streets in the City of Naples that have been part of the commercial landscape for more than 50 years. The commercial portion of 5th avenue south alone is over ½ mile long and was long established prior to the introduction of residential units over the commercial. This area is considered the center and a focal point in the City of Naples.

3. Also cited is Bayfront, a 65 foot high-rise, water-front up-scale residential development within the city of Naples that has some retail and office components on the lower floors. The project is located on the Gordon River and contains a commercial marina with boat rentals and boat slips.

4. Lastly, staff points to the Mercato MPUD (Ord 06-32) which is a 53 acre commercial development with up to 495,000 commercial square feet and 175 residential units. To date, while over 486,000 sq. ft. of commercial developments has been built, only 92 multi-family units have been constructed. The main thoroughfare through the project connects one arterial road, Vanderbilt Beach Road to another arterial road, US 41. The size, commercial mass and location of the project in no way parallels the Buckley parcel.

None of these projects compares favorably to the subject property. While at some point in the future, a small, mixed use project may find a market in Southwest Florida that market remains untested to date with no viable working examples at the same scale and physical characteristics as the Buckley parcel.

Point 2: Staff provided an analysis of built and un-built commercial square footage for lands both zoned and un-zoned as a basis for concluding that there is ample supply of commercial land in the immediate area to meet current and future needs. This analysis utilizes the annual PUD Monitoring reports with address maximum permitted development allowed. A survey of the physical, built environment yields a

different result. Below is a summary of the differences between the data presented by Staff with regard to available commercial and the actual physical land that is available.

On page 9 of the staff analysis, they identify the remaining commercial opportunities in Activity Center #11, which is the intersection of Vanderbilt Beach Road and Airport Road. According to monitoring reports, out of a total of nearly 1,250,000 square feet of approved commercial zoning at this intersection, over 200,000 square feet remains to be developed. Most of this commercial square footage is not currently available.

To illustrate, monitoring reports indicate that the SW Quadrant of Activity Center #11 has over 93,000 square feet of commercial development remaining. However, when you look at an aerial of this area the actual land available is very limited. What appears as a vacant parcel fronting VBR is currently under development for the Alamo Gun Shop and Range, so in reality only two vacant commercially zoned parcels actually exist and at .2 acres and .5 acres respectively, they could support a combined total of 5 to 10,000 square feet. This is a mere fraction of what is identified in the PUD monitoring reports, resulting in a potential over-statement of availability. Additionally, this small acreage does not front on a collector or arterial roadway as the Buckley parcel does and is therefore cannot be considered similar in nature to the Buckley site.

Addressing the balance of the rest of Activity Center #11, similar conditions are present. With regard to the NW and NE quadrants, the staff report indicates 331,400 sq. ft. are approved. The unbuilt acreage however involves only 2 parcels totaling 2.27 acres as shown here that would support 15 to 17,000 square feet of retail space. This is less than 5% of the approved square footage.

Moving to the SE corner of Activity Center #11, Staff indicates 75.86 acres of land, allowing 600,000 square feet is permitted with 18% or 108,000 square feet remaining to be built. While this quadrant of Activity Center #11 lies within the Vineyards PUD, the PUD covers 1,900 acres, nearly 3 square miles. Of the 75.86 acres of commercial in the PUD, only 32 acres lie in Activity Center #11 and it is 100% built out with no vacant land available.

To summarize Activity Center #11, while an analysis of the PUD monitoring report may give the appearance that a significant amount of retail square footage could be constructed, the reality is that only 4 parcels of land totaling less than 3 acres is un-built, which would support just over 20,000 square feet of retail development.

Similarly, summary of the staff analysis for Activity Center #13 shows that of the 306 acres of land cited in the staff report, only 26 acres, or 8% is vacant and available for development. This would support less than 200,000 square feet versus the 325,094 sq. ft. cited as undeveloped square footage. All of these 26 acres lie within the Pine Air Lakes DRI, some of which is of sufficient depth to accommodate the largest of the big-box retailers. The Buckley site may compete with Pine Air Lakes for the small to mid-sized retailers but is not a site that could accommodate the needs of the very large discount type of retailers.

For example, new Super Target, Wal-Mart, etc. have minimum depths in the 800 – 900 foot range with the two older Wal-Marts being over 700 feet in depth. The Buckley site by comparison is only 500 feet in depth, so when it comes to competing for the true big-box retailers, the Buckley site cannot even enter the race.

Staff's analysis of available Commercial also includes the Orange Blossom Mixed Use sub-district, also known as the Longview Center PUD, totaling 14.75 acres with up to 143,500 square feet of commercial development allowed. This Subdistrict contains many of the same regulations and restrictions as the Buckley parcel, with an even more stringent cap on commercial building size. Another unfortunate example of the failed mixed-use concept on smaller parcels, this project will in all likelihood need to be re-tooled at some point if it were to move forward in the current marketplace.

The last example Staff cites in their analysis is the Orange Blossom / Airport Roads Commercial Sub-district which consists of 2 – 5 acre parcels. Both parcels are limited to fraternal and institutional uses and professional or general office uses. Neither parcel has the ability under the current GMP to develop with retail commercial so while they may permit some commercial development, it is not in the same category as what I permitted on the Buckley parcel.

When you look closely at the land within the areas identified in the staff report, less than 6% of this total is actually zoned for retail development and available, and the vast majority of that amount lies within the Pine Air Lakes development, a project geared toward the largest of the large retailers as its target market. The petitioner believes that the low availability of raw land for retail commercial development is insufficient to meet the current and future demands of the area.

The data and analysis provided by the applicant looked at land that is

1. Vacant
2. Zoned for retail commercial development
3. And Fronting a collector or arterial Road.

Our primary focus was the Airport Road Corridor, which has an established, commercial pattern of development. This is supported by Planning staff's testimony in 2001 where they cite the presence of commercial zoning in the area of the Buckley parcel as well as activity centers 11 and 13 as commercial 'anchors' formed the basis for their support commercial development was appropriate in this location.

The airport road corridor is a key corridor for commercial business, and this site has the potential to capture a significant number of trips that are already on Airport Road, accessing existing businesses for residents in the area.

Within one mile of the subject site, only two parcels are available, totaling 2.3 acres. These two parcels were not included in our original analysis, but are the only two parcels within one mile of the site that could accommodate retail commercial and have visibility from a major roadway.

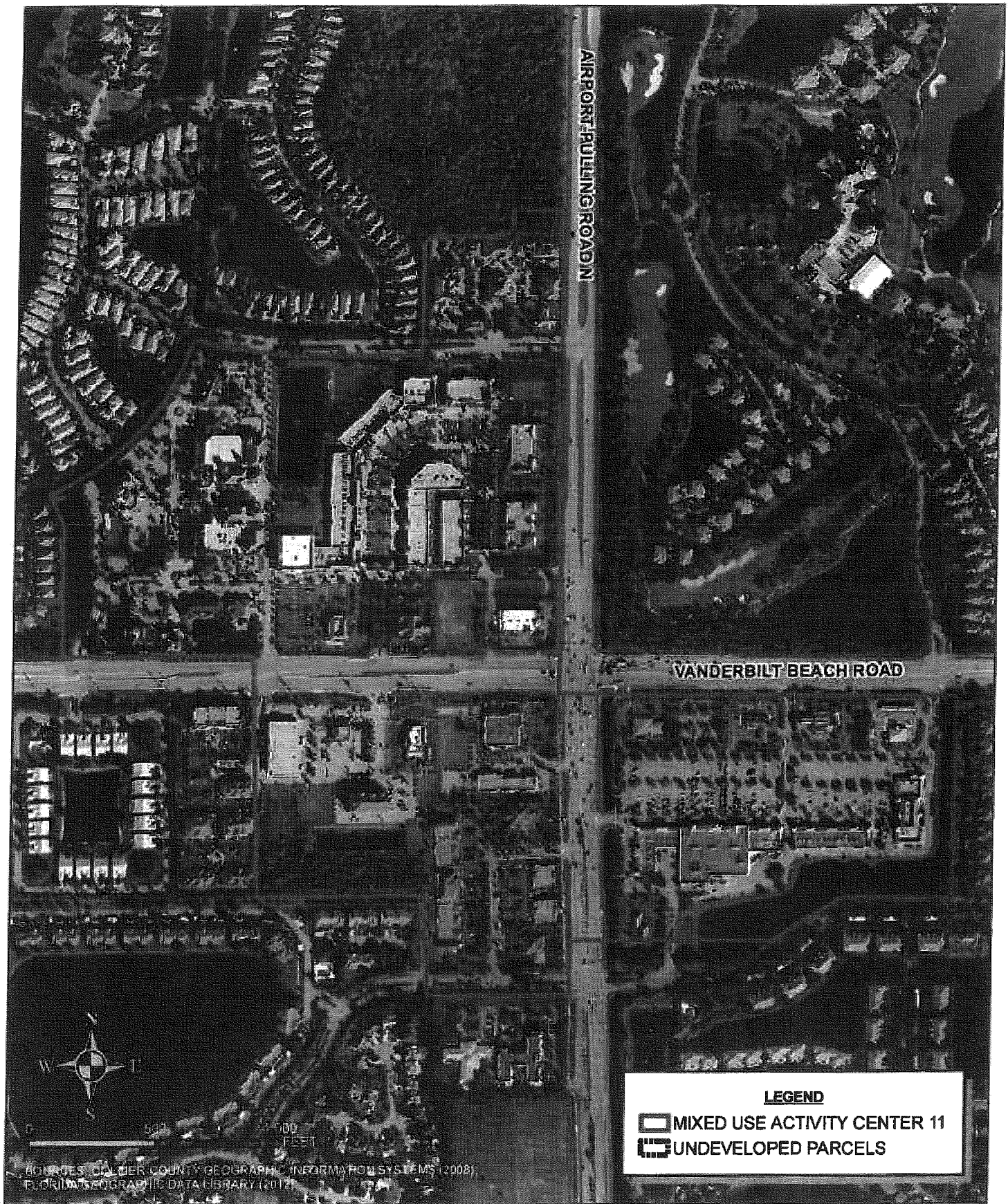
Extending out to a two-mile radius, you see the addition of the land within Pine Air Lakes in addition to three other parcels. The total acreage of parcels shown on this exhibit is just over 51 acres, 26 acres of which lies within the Pine Air Lakes DRI as previously discussed.

Extending out to 3 miles, which translates to drive distances in some cases of more than 4.5 miles from the subject site, we begin to see some of the land located in the I-75 Interchange Activity Center on Pine Ridge Road. Many of these PUD's have Sunset, several have no current viable access due to interconnection requirements, and a couple are not adjacent to or visible from the roadway and would not compete with the Buckley parcel, but we have chosen to include them anyway.

Looking to the Northeast, you see primarily the Creekside Commerce Park, more than 3 miles driving distance from the subject property. While there exists almost 27 vacant acres, as cited in the Naples Daily News in September, a new hospital is planned for this land, scheduled to open in 2015. This could spark additional medical related development in Creekside with the co-location of NCH north and the new hospital.

Using the two mile radius as a market area, the total area is more than 2,000 acres, 52 acres of which, or less than 3% remains available for commercial development. Of that 3%, half is located in Pine Air Lakes, and only ONE TENTH OF 1 PERCENT of this area lies within one mile of the subject property and meets the criteria to be considered 'developer ready'.

The information presented by the petitioner identifies the limited availability of pad-ready commercial sites in near proximity to the subject site. The testimony provided by Mr. David Stevens at the CCPC serves to identify an existing and future demand for these kinds of sites along the Airport Road Corridor. When viewed in total, it is the petitioner's position that this proposed change to the GMP will help meet the demand for more community commercial development in the area in a form that is more conducive to what the market requires.



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BUCKLEY GMPA
 MIXED USE ACTIVITY CENTER #11
 (UNDEVELOPED PARCELS)

LEGEND

-  MIXED USE ACTIVITY CENTER 13
-  UNDEVELOPED PARCELS





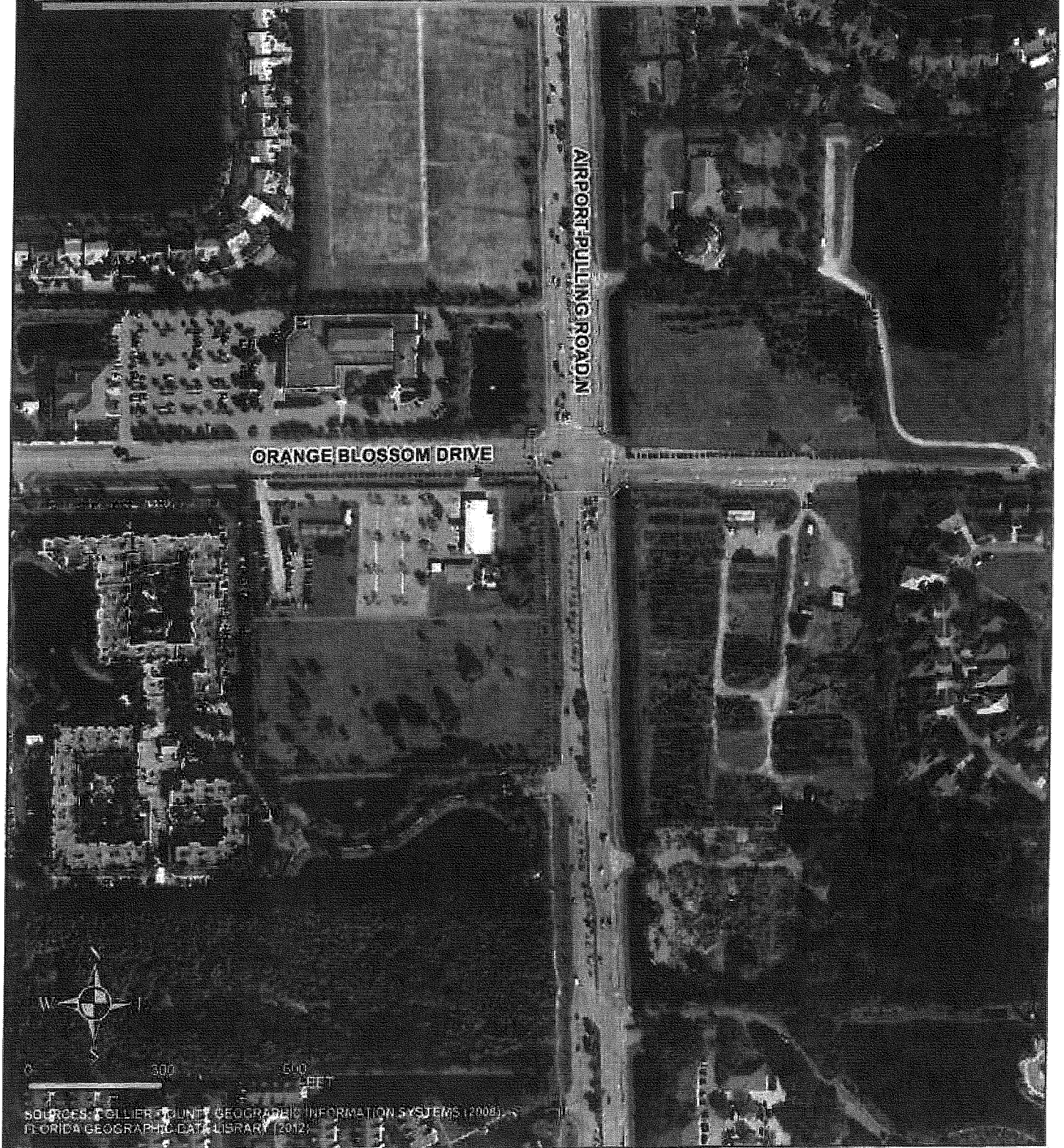
SOURCES: PALMER COUNTY GEOGRAPHIC INFORMATION SYSTEMS (2011)
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BUCKLEY GMPA
MIXED USE ACTIVITY CENTER #13
(UNDEVELOPED PARCELS)

LEGEND

-  ORANGE BLOSSOM/AIRPORT CROSSROADS COMMERCIAL SUBDISTRICT
-  ORANGE BLOSSOM MIXED-USE SUBDISTRICT



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BUCKLEY GMPA
ORANGE BLOSSOM/AIRPORT CROSSROADS
COMMERCIAL SUBDISTRICT &
ORANGE BLOSSOM MIXED-USE SUBDISTRICT