



Comprehensive Planning Memorandum

August 7, 2013

Sent Via E-Mail

Mr. Richard Yovanovich, Esq.
Coleman, Yovanovich and Koester, P.A.
850 Park Shore Drive, Trianon Centre
Naples, FL 34103

and

Mr. Wayne Arnold, AICP
Q. Grady Minor and Associates, P.A.
3800 Via Del Rey
Bonita Springs, FL 34134

RE: Sufficiency Review of Growth Management Plan Amendment Petition PL20130001345/CP-2013-8, a Growth Management Plan amendment to the Immokalee Area Master Plan Element and Future Land Use Map of the Growth Management Plan to allow the re-designation of ± 24.5 acres from the Neighborhood Center Subdistrict (± 19.07 ac.) , Low Residential Subdistrict (± 5.28 ac.) and High Residential Subdistrict (± 20 ac.) to the S.R. 29 and Jefferson Avenue Commercial Subdistrict to accommodate a Large Format Retail Center of up to 162,000 sq. ft.

Dear Mr. Yovanovich and Mr. Arnold:

Pursuant to Paragraph B. (ii) of Resolution No. 12-234, this letter is to inform you that the referenced application is not sufficient to enable staff to conduct a formal [substantive] review. Below is the list of deficiencies that need to be corrected/addressed.

APPLICATION AND EXHIBITS:

Each deficiency below corresponds to the application numbers and letters.

- Generally Sequentially number all text/exhibits/maps
- I.A. Provide documentation that authorizes David Genson to act on behalf of Barron Collier Investments, Ltd.
- II.D. Disclosure of Interest Information: Provide the beneficiaries of each Trust
- II.D. Disclosure of Interest Information and Limited Partnership Annual Report: Explain why the partnership information is not consistent on both documents
- Exhibit IV.B. Text modifications may be proposed by staff as part of the ongoing review of the petition. [Please note that the S.R. 29 and Jefferson Ave. Commercial Subdistrict limits commercial uses/intensities to those commercial uses of the C1 through C4 zoning districts of the Collier County Land Development Code (LDC). Additionally,

the proposed project shall be subject to the S.R. 29 and Jefferson Ave. Commercial Overlay of the LDC, unless exempted.]

Narrative/
Exhibit V.D./
Pre-app. Notes

Data and analysis to support the suitability of land for the proposed use.

Narrative: Provide the justification/explanation for expanding the commercial boundary for the proposed project beyond the limits of the existing Neighborhood Center acreage into the Low Residential and High Residential Subdistricts.

Exhibit V.D (Request for supplemental data is based on the meeting between staff and representatives from Fishkind and Associates – held on June 10, 2013 – prior to the formal project submittal; pre-application meeting notes, dated May 31, 2013; and, the formal market study submittal – Exhibit V.D.):

- Provide an economic and fiscal impact assessment. This analysis should address the following: (1) evaluate the impacts of the large format retailer on the local economy and community (i.e. (a.) identify goods and services offered by proposed retailer, forecast sales for each line of goods and services, and estimate jobs and wages associated with the forecast sales; and (b.) compare the proposed retailer's line of goods and services with existing local businesses to determine product overlap and if the new retailer provides additional public choice); (2) evaluate how the existing retail/service economy will likely respond to the proposed retailer (i.e. estimate (low and high range) how much of the proposed retailer's projected sales will be drawn from existing retailers/service providers and how much will be new to the community); and (3) evaluate the project's impact on retail/service employment, wages, tax revenues, community's potential changes in spending patterns, costs to the County/CRA, and, etc.
- Commercial Needs Analysis document. Provide the following additions, revisions and/or explanations: (1) page 2, demonstrate that the proposed project is a "Pareto improvement" (response may be incorporated into the above economic and fiscal assessment); (2) page 7, table 2, (a.) provide 2010 Census base year data; (b.) provide support data/specific source information for household (occupied unit) and household income figures, as the figures within the table appear higher than staff's data, which includes figures from the 2010 Census and ACS estimates; (3) page 12, Appendix A 2, same request as noted for table 2, on page 7; (4) page 12, based on data provided within the "income and expenditure table," the income expenditure percentage on retail is ± 54 percent – please provide specific data source and raw data, so staff may verify figure (figure appears high); (5) page 12, provide a table that includes *all* potential retail expenditures and supportable square feet within the community; (6) pages 12 – 14, revise the footnotes on all tables to include the source year for "Dollars and Cents of Shopping Centers," (7) quantify actual retail sales within the market area by the line of goods and services; and, (8) quantify the existing retail and service employment within the community.

Pre-application Meeting Notes:

- Economic Incentives & Market Demand Analysis – (1) provide a listing of all state, federal or local economic incentives, including tax increment financing, that the proposed development may receive (response may be incorporated into above request); and, (2) provide an employment analysis, including earnings calculations, for the potential \pm 400 jobs resulting from the proposed development (response may be incorporated into above request).

Exhibit V.E. Public Facilities

- Potable Water, page 1: (1) delete incorrect references to the County and replace with "Immokalee Water and Sewer District or IWSD"; (2) delete incorrect square feet figure and replace with "162,000" square feet; (3) delete incorrect single-family figure and replace with "20" single-family units; and, (4) provide a footnote to explain the "1.5 max month" figure.
- Sanitary Sewer, page 2: Delete incorrect single-family figure and replace with "20" single-family units.
- Potable Water and Sanitary Sewer, "Request for Service Availability": Provide the water and sewer available capacity response letter from the IWSD.
- Transportation: Refer to John Podczerwinsky's review comments below

Exhibit V.G. Notarized Letter of Authorization: Based on the document titled "Action by Unanimous Consent and Designation of Authority of Barron Collier Investments, LTD," it appears that two individuals must provide authorization for the Agents' to act on their behalf; please review document and address accordingly.

Additional Staff Comments

Stephen Lenberger, Senior Environmental Specialist, Surface Water and Environmental Planning:

The subject property is partially vegetated with native vegetation, fifteen percent of which is required to be retained in accordance with CCME Policy 6.1.1, if the project is developed as commercial. According to arials available on the Property Appraisers website, much of the property was cleared for pasture prior to 1985. Clearing for agricultural purposes prior to Ordinance No. 76-42 is exempt from the requirements for an agricultural clearing permit. Documentation of when the property was cleared will be required during review of the PUD.

A listed species survey was conducted on June 12, 2013 by the environmental consultant for the project and no listed species or signs of listed species were observed during the survey. Given the disturbed nature and location of the site, it is unlikely that listed species would occur on the property.

A letter from the Florida Master Site File regarding previously recorded cultural resources was not included in the application package. The project would be subject to the requirement for accidental discovery of archaeological or historical sites as required by Conservation and Coastal Management Element Policy 11.1.3. The provision is also included in Subsection 2.03.07 E of the Land Development Code.

The proposed GMP amendment will have no affect on the requirements of the Conservation and Coastal Management Element.

John Podczerwinsky, Development Review Project Manager, Transportation Planning Section:

Transportation Element Objective 5, Policy 5.1:

TIS Comments (Also reflected in the PUD review comments):

1. Table 2A- There is a discrepancy with Figure 2A; 2% distribution versus 5% distribution on Immokalee Rd between Oil Well and SR-29. Please correct.
2. Figure 2B- There should be 29VPH Southbound in PM Peak Hour approaching intersection from Northern access drive.
3. Page A-1 shows PHF=0.95. However, Sheets A-5, A-6, A-8, A-8, and A-9 use PHF=0.97. Staff suggests a PHF=0.90 is more appropriate for this rural area.
4. Please provide an unsignalized analysis of the 2019 condition (with project traffic) for comparison purposes against conditions without project traffic.
5. Please reconcile any discrepancies throughout the report that are caused by these comments. Staff recognizes that some analyses may require to be redone, but that conclusions may not change.

Staff Note – The following are Developer Commitments required in the companion PUD application:

Signal:

1. The requirement of, and permitting for, a signal at the intersection of SR-29 and Westclox/NewMarket is at the discretion of FDOT. Any proportionate, partial, or full payment for signal installation shall be determined by FDOT. Please modify the Transportation commitment to reflect this. Also, remove any statement that requires the County to operate and maintain the signal.
2. If a signal at the intersection of is not determined to be required at the commencement of this project, the developer must commit to provide a signal warrant study annually, along with the PUD Traffic Monitoring Report (for a minimum of the first year after the CO is issued for the main structure). The additional warrant study report shall be due until such time that a signal is deemed unnecessary for two consecutive years.
3. The developer must commit to pay proportionate share for maintenance of the signal at SR-29 and Westclox/New Market once installed.

Transportation Element Objective 4 -Pathways:

*The proposed Growth Management Plan Amendment is **not** consistent with Objective 4, policies 4.2 and 4.6, of the Transportation Element. The developer will be required to interconnect to (and extend) the existing Bicycle and Pedestrian System to serve this project. The following recommendations are made (all are requirements of the simultaneous PUD review that has been submitted):*

1. Staff requests that the developer commit to pay-in-lieu for the LDC required 6' sidewalk along SR-29. Please detail this as a developer commitment in the Transportation section on Exhibit E of the PUD. Payment would be required at the time of SDP application. The amount of the payment should follow FDOT guidelines.

2. Connection to all existing and committed pedestrian facilities at the intersection of SR-29 and Westclox/New Market intersection is necessary. Off-site improvements (such as curb ramps and crosswalks) will be necessary to provide connection to this site. As an informational comment, the developer shall be required to make these connections at the time of SDP application.
3. Please add a developer commitment to install or fund, at no cost to Collier County, pedestrian facilities (ped-heads) at the time this intersection is signalized. Pedestrian crossing(s) at this intersection are site-related and are attributable to this development, as they would not be necessary to install without this proposed up-zoning.
4. Please provide a commitment to include bicycle racks within the PUD.

Transportation Element Objective 6 Policy 6.1:

Demonstrate consistency with the MPO's Long Range Transportation Plan. SR-29 along the project frontage is demonstrated to have a "need" to be widened to 4LD, and is also within the SR-29 Loop Road study area.

Transportation Element, Objective 12- Transit Requirements:

Demonstrate consistency with Objective 12 of the Transportation Element by addressing Transit-related accommodations at, or within, the site.

Note: The following requirement(s) are stated in the companion PUD review:

Please provide transit facilities to serve alternative modes of transportation to this parcel. County requests provision of a bus shelter within the site that will serve both Transit routes connecting to this facility, along with any necessary supporting easements and/or rights of entry. Please contact TrinityScott@Colliergov.net or BrandyOtero@Colliergov.net to discuss design recommendations.

Kris VanLengen, Principal Planner, Public Utilities Engineering:

Public Utilities' staff has determined that there are no issues with the application at this time.

The *original* application is available for pick-up. Once the petition has been modified to address the above items, please re-submit the original, plus three copies – all properly assembled – and an electronic submittal on a CD, for a second sufficiency review. Resolution #12-234 provides 30 days (**September 6, 2013**) for you to respond to this letter with supplemental data.

Should you have questions and/or wish to schedule a meeting with staff to discuss the sufficiency comments, please contact me at **239.252.2466** or via email at micheleamosca@colliergov.net.

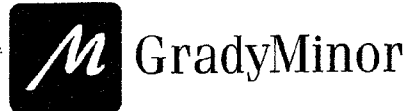
Regards,

Michele R. Mosca, AICP
Principal Planner

cc:

Michael Bosi, AICP, Planning and Zoning Director
David Weeks, AICP, Growth Management Plan Manager, Comprehensive Planning Section
CP-2013-8 File

Page separator only



Civil Engineers • Land Surveyors • Planners • Landscape Architects

October 7, 2013

Michele R. Mosca, AICP
Principal Planner
Growth Management Division/Planning and Regulation
Land Development Services Department
Comprehensive Planning Section
2800 North Horseshoe Drive
Naples, FL 34104

RE: Sufficiency Review of Growth Management Plan Amendment Petition PL20130001345/CP-2013-8, a Growth Management Plan amendment to the Immokalee Area Master Plan Element and Future Land Use Map of the Growth Management Plan

Dear Ms. Mosca:

This letter contains responses to staff comments received August 7, 2013, via email. In addition to the responses below, we have included one original and four copies of the application, including revised exhibits as requested. Please note that the boundary and acreage of the project has been increased slightly along the northern boundary to accommodate a request by FDOT to insure adequate site access from State Road 29.

APPLICATION AND EXHIBITS:

Each deficiency below corresponds to the application numbers and letters.

Generally Sequentially number all text/exhibits/maps
I.A. Provide documentation that authorizes David Genson to act on behalf of Barron Collier Investments, Ltd.

Response:

Documentation of authority is enclosed as requested.

I.I.D. Disclosure of Interest Information: Provide the beneficiaries of each Trust
I.I.D. Disclosure of Interest Information and Limited Partnership Annual Report:
Explain why the partnership information is not consistent on both documents

Response:

The partnership information is different because the Disclosure of Interest is a list of owners, whereas the Annual Report is a list of partners for Barron Collier Investments, LTD.

Exhibit IV.B. Text modifications may be proposed by staff as part of the ongoing review of the petition. [Please note that the S.R. 29 and Jefferson Ave. Commercial Subdistrict limits commercial uses/intensities to those commercial uses of the C1 through C4

Ms. Michele Mosca

Sufficiency Review of Growth Management Plan Amendment Petition PL20130001345/CP-2013-8, a Growth Management Plan amendment to the Immokalee Area Master Plan Element and Future Land Use Map of the Growth Management Plan.

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zoning districts of the Collier County Land Development Code (LDC). Additionally, the proposed project shall be subject to the S.R. 29 and Jefferson Ave. Commercial Overlay of the LDC, unless exempted.]

Response:

Comment acknowledged.

Narrative/Data and analysis to support the suitability of land for the proposed use.

Exhibit V.D./

Pre-app. Notes

Narrative: Provide the justification/explanation for expanding the commercial boundary for the proposed project beyond the limits of the existing Neighborhood Center acreage into the Low Residential and High Residential Subdistricts.

Response:

A description of the proposed amendment is included in the application. The current land use designations do not permit the type of commercial proposed at this location.

Exhibit V.D (Request for supplemental data is based on the meeting between staff and representatives from Fishkind and Associates – held on June 10, 2013 – prior to the formal project submittal; pre-application meeting notes, dated May 31, 2013; and, the formal market study submittal – Exhibit V.D.):

- Provide an economic and fiscal impact assessment. This analysis should address the following: (1) evaluate the impacts of the large format retailer on the local economy and community (i.e. (a.) identify goods and services offered by proposed retailer, forecast sales for each line of goods and services, and estimate jobs and wages associated with the forecast sales; and (b.) compare the proposed retailer's line of goods and services with existing local businesses to determine product overlap and if the new retailer provides additional public choice); (2) evaluate how the existing retail/service economy will likely respond to the proposed retailer (i.e. estimate (low and high range) how much of the proposed retailer's projected sales will be drawn from existing retailers/service providers and how much will be new to the community); and (3) evaluate the project's impact on retail/service employment, wages, tax revenues, community's potential changes in spending patterns, costs to the County/CRA, and, etc.

Response:

You had requested an analysis of the impact a large format retail facility would have on locally owned retailers. Answering this question requires very complex analysis, which would require a significant and expensive effort to obtain the required data in order to

complete the analysis. Further, there appears to be no single accepted methodology used in fiscal and economic analyses to attempt to address impacts to small businesses. The fact is that Immokalee already has a significant number of national and regional retail service providers and no required comparison for those businesses was a prerequisite to their establishing business operations in Immokalee. The included market demand information does address the anticipated positive economic impacts that will result from construction of a large format retail center in the Immokalee Community, including employment and taxable real estate values.

- Commercial Needs Analysis document. Provide the following additions, revisions and/or explanations: (1) page 2, demonstrate that the proposed project is a "Pareto improvement" (response may be incorporated into the above economic and fiscal assessment); (2) page 7, table 2, (a.) provide 2010 Census base year data; (b.) provide support data/specific source information for household (occupied unit) and household income figures, as the figures within the table appear higher than staff's data, which includes figures from the 2010 Census and ACS estimates; (3) page 12, Appendix A 2, same request as noted for table 2, on page 7; (4) page 12, based on data provided within the "income and expenditure table," the income expenditure percentage on retail is +54 percent – please provide specific data source and raw data, so staff may verify figure (figure appears high); (5) page 12, provide a table that includes *all* potential retail expenditures and supportable square feet within the community; (6) pages 12 – 14, revise the footnotes on all tables to include the source year for "Dollars and Cents of Shopping Centers," (7) quantify actual retail sales within the market area by the line of goods and services; and, (8) quantify the existing retail and service employment within the community.

Response:

1. Pareto Improvement – addressed in economic and fiscal assessment.
2. Page 7, table 2
 - a. 2010 Census base year data provided in appendix.
 - b. Household Size - Revised report acknowledges 2010 persons per household figure of 4.16 based on 2010 Census population and households. This figure includes group quarters population and therefore differs from the 3.96 persons per household shown in 2010 Census table DP-1. Fishkind revised analysis in years 2015 to 2025 to include a range of persons per household figures from 4.0 to 3.5. The range is intended to better capture future conditions in the community with regard to revitalization efforts currently in place, investment in a more diversified economy and the character of growth

expected to occur in Immokalee – all of which are likely to decrease household size over time as incomes and housing opportunities improve.

Incomes – Analysis uses mean household income from U.S. Census 2009-2011 ACS for the Immokalee CDP escalated at 2% per year through analysis horizon year. Figures shown in 2009-2011 Census ACS table reflect 2011 inflation adjusted-dollars. The revised report uses 2011 as the base year for escalating incomes rather than 2010 used in the original report.

3. Page 12 Appendix A2 tables - 2010 Census base year data provided in appendix; HH Size and income explanation provided above also applies to these tables.
4. Specific data source and raw data provided.
5. Revised report includes appendix tables that show all potential retail expenditures and supportable square feet in the community.
6. Pages 12-14 table notes revised.
7. Information does not relate to submitted land use need study.
8. Revised report includes requested information in appendix.

Pre-application Meeting Notes:

- Economic Incentives & Market Demand Analysis – (1) provide a listing of all state, federal or local economic incentives, including tax increment financing, that the proposed development may receive (response may be incorporated into above request); and, (2) provide an employment analysis, including earnings calculations, for the potential ± 400 jobs resulting from the proposed development (response may be incorporated into above request).

Response:

The above comments have been addressed in the revised demand analysis.

Exhibit V.E. Public Facilities

- Potable Water, page 1: (1) delete incorrect references to the County and replace with “Immokalee Water and Sewer District or IWSD”; (2) delete incorrect square feet figure and replace with “162,000” square feet; (3) delete incorrect single-family figure and replace with “20” single-family units; and, (4) provide a footnote to explain the “1.5 max month” figure.
- Sanitary Sewer, page 2: Delete incorrect single-family figure and replace with “20” single-family units.

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- Potable Water and Sanitary Sewer, "Request for Service Availability": Provide the water and sewer available capacity response letter from the IWSD.
- Transportation: Refer to John Podczerwinsky's review comments below

Response:

Exhibit V.E. has been revised as requested and the water and sewer available capacity letter from IWSD is included with this submittal.

Exhibit V.G. Notarized Letter of Authorization: Based on the document titled "Action by Unanimous Consent and Designation of Authority of Barron Collier Investments, LTD," it appears that two individuals must provide authorization for the Agents' to act on their behalf; please review document and address accordingly.

Response:

Revised authorization forms have been provided with this resubmittal.

Additional Staff Comments

Stephen Lenberger, Senior Environmental Specialist, Surface Water and Environmental Planning:

The subject property is partially vegetated with native vegetation, fifteen percent of which is required to be retained in accordance with CCME Policy 6.1.1, if the project is developed as commercial. According to arials available on the Property Appraisers website, much of the property was cleared for pasture prior to 1985. Clearing for agricultural purposes prior to Ordinance No. 76-42 is exempt from the requirements for an agricultural clearing permit. Documentation of when the property was cleared will be required during review of the PUD.

A listed species survey was conducted on June 12, 2013 by the environmental consultant for the project and no listed species or signs of listed species were observed during the survey. Given the disturbed nature and location of the site, it is unlikely that listed species would occur on the property.

A letter from the Florida Master Site File regarding previously recorded cultural resources was not included in the application package. The project would be subject to the requirement for accidental discovery of archaeological or historical sites as required by Conservation and Coastal Management Element Policy 11.1.3. The provision is also included in Subsection 2.03.07 E of the Land Development Code.

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The proposed GMP amendment will have no effect on the requirements of the Conservation and Coastal Management Element.

Response:

Comment Acknowledged.

John Podczewinsky, Development Review Project Manager, Transportation Planning Section:

Transportation Element Objective 5, Policy 5.1:

TIS Comments (Also reflected in the PUD review comments):

1. Table 2A- There is a discrepancy with Figure 2A; 2% distribution versus 5% distribution on Immokalee Rd between Oil Well and SR-29. Please correct.
2. Figure 2B- There should be 29VPH Southbound in PM Peak Hour approaching intersection from Northern access drive.
3. Page A-1 shows PHF=0.95. However, Sheets A-5, A-6, A-8, A-8, and A-9 use PHF=0.97. Staff suggests a PHF=0.90 is more appropriate for this rural area.
4. Please provide an unsignalized analysis of the 2019 condition (with project traffic) for comparison purposes against conditions without project traffic.
5. Please reconcile any discrepancies throughout the report that are caused by these comments. Staff recognizes that some analyses may require to be redone, but that conclusions may not change.

Response:

These comments have been addressed and are included with the revised TIS.

Staff Note – The following are Developer Commitments required in the companion PUD application:

Signal:

1. The requirement of, and permitting for, a signal at the intersection of SR-29 and Westclox/NewMarket is at the discretion of FDOT. Any proportionate, partial, or full payment for signal installation shall be determined by FDOT. Please modify the Transportation commitment to reflect this. Also, remove any statement that requires the County to operate and maintain the signal.
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3. The developer must commit to pay proportionate share for maintenance of the signal at SR-29 and Westclox/New Market once installed.

Response:

These comments have been addressed in the PUD sufficiency response letter rather than the GMP amendment.

Transportation Element Objective 4 -Pathways:

*The proposed Growth Management Plan Amendment is **not** consistent with Objective 4, policies 4.2 and 4.6, of the Transportation Element. The developer will be required to interconnect to (and extend) the existing Bicycle and Pedestrian System to serve this project. The following recommendations are made (all are requirements of the simultaneous PUD review that has been submitted):*

1. Staff requests that the developer commit to pay-in-lieu for the LDC required 6' sidewalk along SR-29. Please detail this as a developer commitment in the Transportation section on Exhibit E of the PUD. Payment would be required at the time of SDP application. The amount of the payment should follow FDOT guidelines.
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4. Please provide a commitment to include bicycle racks within the PUD.

Response:

These comments have been addressed in the PUD sufficiency response letter rather than the GMP amendment.

Transportation Element Objective 6 Policy 6.1:

Demonstrate consistency with the MPO's Long Range Transportation Plan. SR-29 along the project frontage is demonstrated to have a "need" to be widened to 4LD, and is also within the SR-29 Loop Road study area.

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Sufficiency Review of Growth Management Plan Amendment Petition PL20130001345/CP-2013-8, a Growth Management Plan amendment to the Immokalee Area Master Plan Element and Future Land Use Map of the Growth Management Plan.

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Response:

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Transportation Element, Objective 12- Transit Requirements:

Demonstrate consistency with Objective 12 of the Transportation Element by addressing Transit-related accommodations at, or within, the site.

Note: The following requirement(s) are stated in the companion PUD review:

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Response:

These comments have been addressed in the PUD sufficiency response letter rather than the GMP amendment.

Please contact me if there are any questions.

Sincerely,



D. Wayne Arnold, AICP

cc: David B. Genson, PE
Richard D. Yovanovich, Esq.
GradyMinor File

Page separator only



Comprehensive Planning Section Memorandum

February 4, 2014

Sent Via E-Mail

Mr. D. Wayne Arnold, AICP
Q. Grady Minor and Associates, P.A.
3800 Via Del Rey
Bonita Springs, FL 34134

and

Mr. Richard Yovanovich, Esq.
Coleman, Yovanovich and Koester, P.A.
4001 Tamiami Trail North, Suite 300
Naples, FL 34103

RE: Sufficiency Review of Growth Management Plan Amendment Petition PL20130001345/CP-2013-8, a Growth Management Plan amendment to the Immokalee Area Master Plan Element and Future Land Use Map of the Growth Management Plan to allow the re-designation of ±24.5 acres from the Neighborhood Center Subdistrict (±19.07 ac.) , Low Residential Subdistrict (±5.28 ac.) and High Residential Subdistrict (±.20 ac.) to the S.R. 29 and Jefferson Avenue Commercial Subdistrict to accommodate a Large Format Retail Center of up to 162,000 sq. ft.

Dear Mr. Arnold and Mr. Yovanovich:

As a follow-up to the January 24, 2014 meeting concerning the market study/needs analysis for the above-referenced petition, below is list of items that should be addressed within the re-submittal.

Market Study: Items 1-14

- (1) Page 8, Household PPH figures: Use a 4.0 pph figure, and also provide the pph studies referenced on page 7 of the Report. (Note: Comprehensive Planning's population figures include all population groups, including group quarters. So, the 4.17 pph figure from the 2010 Census is most accurate considering that pph figure includes all pop. groups, consistent with Comp. Planning data.)
- (2) Page 8: Delete the 3.75 pph and 3.5 pph figures and corresponding data, unless justification can be provided to support use of those figures. (Note: These figures have the potential to inflate the number of households, thereby resulting in greater retail expenditure figures.)
- (3) Page 8, Household Income: Evaluate the use of a weighted average for median household income rather than using the "mean" which has the potential for skewing income figures.

- (4) Page 9, Table 4: Remove the 3.75 and 3.5 pph tables/data, unless justification can be provided to support the use of these figures/data.
- (5) Page 13, Expenditure tables: The consumer expenditure figure of 53.9% does not appear to be consistent with the manual calculation of 52%; accordingly, provide an explanation or revise to reflect the 52% figure. Also, provide a narrative with the consumer expenditures document that explains how the figures are characteristic of the Immokalee community, including age, race, expenditures, and etc.
- (6) Appendix A-2, Pages 13-17: Remove the 3.75 and 3.5 pph data, unless justification can be provided to support the use of these figures/data.
- (7) Page 16, 4.0 PPH Table: This table provides community square feet demand for various categories for years 2015, 2020 and 2025. Explain why square feet caps should not be imposed, consistent with these categories.
- (8) Appendix A-4, DP-1, page 4: The occupied household unit count is listed as 5,795 and the DP03 (2009 – 2011) report lists a household unit count of 3,836; accordingly, please explain the difference in these figures.
- (9) Provide legible copy of the Consumer Expenditures document.
- (10) Economic Contribution Tables 1 and 2: (1) Employment figures/calculations appear to be inconsistent; accordingly, provide explanation/footnotes; and, (2) Table 2 – provide raw data (on CD) for all employment data.
- (11) Economic Contribution Tables 3 and 4: (1) Employment figures/calculations appear to be inconsistent; accordingly, provide explanation/footnotes; and, (2) Table 4 – provide raw data (on CD) for all employment data.
- (12) Pareto Improvement – If result of development leads to business closures/layoffs – explain how proposed project is a pareto improvement.
- (13) Economic Information, page 4 of 6, last paragraph: This statement may not necessarily be true if jobs aren't filled by Immokalee residents; remove, modify or provide explanation.
- (14) Economic Information, Tax Dollar Calculations, page 5 of 6: The square feet figure of 140,000 is not consistent with project's square feet figure of 162,000; please correct or provide an explanation.

General Discussion Items – Evaluate Project's Impacts on Businesses within the Community

- (1) (This is a repeat from the staff letter dated, August 7, 2013, and is the preferred approach to evaluating the project impacts.) Provide an economic and fiscal impact assessment. This analysis should address the following: (1) evaluate the impacts of the large format retailer on the local economy and community, i.e. (a.) identify goods and services offered by proposed retailer, forecast sales for each line of goods and services, and estimate jobs and wages associated with the forecast sales; and (b.) compare the proposed retailer's line of goods and services with existing local businesses to determine product overlap and if the new retailer provides additional choice; (2) evaluate how the existing retail/service economy will likely respond to the proposed retailer (i.e. estimate how much of the proposed retailer's projected sales will be drawn from existing retailers/service providers and how much will be new to the community); and, (3) evaluate the project's impact on retail/service

employment, wages, tax revenues, community's potential changes in spending patterns, costs to the County/CRA, and, etc. As an alternative, see number (2) below.

- (2) Windshield Survey: Evaluate competing commercial projects within the community to determine potential impacts (positive and/or negative). This evaluation should include employment impacts.
- (3) Calculate or estimate the capture rate of persons and/or households presently leaving Immokalee for goods and services (e.g. to Lehigh Acres, Naples, etc.) that may instead utilize the proposed project site.

Please call me at 239.252.2466 should you have any questions.

Regards,



Michele R. Mosca, AICP
Principal Planner

cc: CP-2013-8 File

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MEMORANDUM

TO: Michele R. Mosca, AICP
Principal Planner
Collier County Comprehensive Planning Section

FROM: G. Russell Weyer
Senior Associate

SUBJECT: Re-submittal of market study/needs analysis report for
GMP Amendment Petition PL20130001345/CP 2013-8

DATE: March 5, 2014

Michele R. Mosca, AICP
Principal Planner
Collier County Comprehensive Planning Section
2800 North Horseshoe Drive
Naples, FL 34104

Dear Ms. Mosca,

The following are responses to your sufficiency letter #2 questions dated February 4, 2014 regarding Growth Management Plan Amendment Petition PL20130001345/CP 2013-8:

Market Study: Items 1-14

(1) Page 8, Household PPH figures: Use a 4.0 pph figure, and also provide the pph studies referenced on page 7 of the Report. (Note: Comprehensive Planning's population figures include all population groups, including group quarters. So, the 4.17 pph figure from the 2010 Census is most accurate considering that pph figure includes all pop. groups, consistent with Compo Planning data.)

A: Took out 3.5 and 3.75 PPH portions of the report and only used 4.0 PPH. The two studies referenced on page 7 of the report are included with this response: The FGCU Immokalee Master Plan Economic Analysis Study and the RWA Data Analysis Rewrite 32410.

1415 Panther Lane, Suite 164 Naples, FL 34109 (239) 254-8585

(2) Page 8: Delete the 3.75 pph and 3.5 pph figures and corresponding data, unless justification can be provided to support use of those figures. (Note: These figures have the potential to inflate the number of households, thereby resulting in greater retail expenditure figures.)

A: We took out the references to the 3.5 PPH and 3.75 PPH in the resubmitted report.

(3) Page 8, Household Income: Evaluate the use of a weighted average for median household income rather than using the "mean" which has the potential for skewing income figures.

A: The commercial needs analysis relies on consumer expenditure survey data from the Bureau of Labor statistics which is based on average incomes and average expenditures; therefore the analysis is also based on average incomes. We have included the Bureau of Labor Statistics CEX methodology for collecting data for the consumer expenditure surveys. The methodology explains why the mean and not the median is used in their collection methods.

(4) Page 9, Table 4: Remove the 3.75 and 3.5 pph tables/data, unless justification can be provided to support the use of these figures/data.

A: We took out the references to the 3.5 PPH and 3.75 PPH in the resubmitted report.

(5) Page 13, Expenditure tables: The consumer expenditure figure of 53.9% does not appear to be consistent with the manual calculation of 52%; accordingly, provide an explanation or revise to reflect the 52% figure. Also, provide a narrative with the consumer expenditures document that explains how the figures are characteristic of the Immokalee community, including age, race, expenditures, and etc.

The BLS CEX table provided with this response shows how the 53.9% is calculated. The attached Bureau of Labor Statistics data collection methodology document indicates that their methodology is impractical to narrow the focus of the survey to cover a small area such as Immokalee. There are currently no known sources that track the spending patterns of the Immokalee therefore the BLS survey is considered the best available data.

(6) Appendix A-2, Pages 13-17: Remove the 3.75 and 3.5 pph data, unless justification can be provided to support the use of these figures/data.

A: We took out the references to the 3.5 PPH and 3.75 PPH in the resubmitted report.

(7) Page 16,4.0 PPH Table: This table provides community square feet demand for various categories for years 2015, 2020 and 2025. Explain why square feet caps should not be imposed, consistent with these categories.

A: The total square feet of the proposed large format retailer building is 162,000 square feet. The square footage of each category will be dictated by market demand. The supplier will adjust each category accordingly based on that market demand.

(8) Appendix A-4, DP-I, page 4: The occupied household unit count is listed as 5J95 and the DP03 {2009 - 2011} report lists a household unit count of 3,836; accordingly, please explain the difference in these figures.

A: The difference in figures is due to the Census collection methodology. DP-1 is the complete decennial census from 2010 and DP-3 is the American Community Survey (also conducted by the Census Bureau), which is a three-year on-going estimate of a small percentage of the population rather than a complete census.

(9) Provide legible copy of the Consumer Expenditures document.

A: A legible copy of the BLS CEX table is provided as a part of this sufficiency response.

(10) Economic Contribution Tables 1 and 2: (1) Employment figures/calculations appear to be inconsistent; accordingly, provide explanation/footnotes; and, (2) Table 2 - provide raw data {on CD} for all employment data.

A: The Implan economic model default table only provides the top 10 job descriptions from the total direct, indirect and induced employment figures. Since Table 2 defaults to the top 10, there is no other raw data to provide.

(11) Economic Contribution Tables 3 and 4: (1) Employment figures/calculations appear to be inconsistent; accordingly, provide explanation/footnotes; and, (2) Table 4 - provide raw data {on CD} for all employment data.

A: The Implan economic model default table only provides the top 10 job descriptions from the total direct, indirect and induced employment figures. Since Table 2 defaults to the top 10, there is no other raw data to provide.

(12) Pareto Improvement - If result of development leads to business closures/layoffs – explain how proposed project is a pareto improvement.

A: The focus of the revised report is on the numerical need calculation which shows that there is a net positive need for the development.

(13) Economic Information, page 4 of 6, last paragraph: This statement may not necessarily be true if jobs aren't filled by Immokalee residents; remove, modify or provide explanation.

A: We have modified the statement by adding the word 'could' in the first sentence and added the last sentence noting that the unemployment rate should fall in a certain range depending on the number of Immokalee residents that are hired.

(14) Economic Information, Tax Dollar Calculations, page 5 of 6: The square feet figure of 140,000 is not consistent with project's square feet figure of 162,000; please correct or provide an explanation.

A: We corrected the project's square feet to 162,000 in the calculation.

General Discussion Items - Evaluate Project's Impacts on Businesses within the Community

(1) {This is a repeat from the staff letter dated, August 7, 2013, and is the preferred approach to evaluating the project impacts.} Provide an economic and fiscal impact assessment. This analysis should address the following: {1} evaluate the impacts of the large format retailer on the local economy and community, i.e. {a.} identify goods and services offered by proposed retailer, forecast sales for each line of goods and services, and estimate jobs and wages associated with the forecast sales; and (b.) compare the proposed retailer's line of goods and services with existing local businesses to determine product overlap and if the new retailer provides additional choice; (2) evaluate how the existing retail/service economy will likely respond to the proposed retailer {i.e. estimate how much of the proposed retailer's projected sales will be drawn from existing retailers/service providers and how much will be new to the community}; and, {3} evaluate the project's impact on retail/service 2 employment, wages, tax revenues, community's potential changes in spending patterns, costs to the County/CRA, and, etc. *As an alternative, see number (2) below.*

(2) Windshield Survey: Evaluate competing commercial projects within the community to determine potential impacts (positive and/or negative). This evaluation should include employment impacts.

(3) Calculate or estimate the capture rate of persons and/or households presently leaving Immokalee for goods and services (e .g. to Lehigh Acres, Naples, etc.) that may instead utilize the proposed project site.

A: We have provided an analysis of the impact a large format retailer would have on the Mom & Pop businesses in Immokalee and an analysis of the impact on the nearby regional and national chains. This analysis is complete with independent studies supporting the study. The independent studies provide empirical evidence and good sound post-development data on the effect of a large format retailer on local businesses. Included in this analysis are studies showing the pull factors that a large format retailer has on small rural communities like Immokalee.

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Via email

Collier County Planning Commission
Attn: Mark Strain, Chairman
Collier County Growth Management Division
2800 North Horseshoe Drive
Naples, FL 34104
MarkStrain@CollierGov.net
239.252.4446

April 22, 2014

RE: CP-2013-8 Proposed Amendment to the Immokalee Area Master Plan for Large Format
Retailer

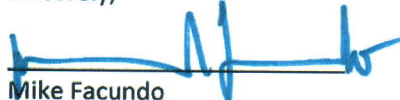
Dear Chairman Strain:

During the March 19, 2014 Immokalee Community Redevelopment Agency (CRA) regular monthly Advisory Board meeting, the Advisory Board voted unanimously in support of the above referenced amendment. However, the Advisory Board also passed a companion motion voicing its concern over the effect that this project will have on the local transportation network. See minutes below.

Although we are specifically concerned with the lack of signalization at the intersection of Westclox Road and SR 29 (North 15th Street), we are also concerned with the overall volume of traffic along the already busy and frequently congested SR 29 corridor. Items such as roadway widening, acceleration/deceleration lanes, off-site pedestrian facilities (sidewalks/crosswalks/CAT bus stops/etc) and street lights need to be addressed.

Please see that this letter is included in the agenda packet for next Tuesday's CCPC public meeting in Immokalee, related to this proposed amendment. Feel free to contact me directly if you would like to discuss this matter.

Sincerely,


Mike Facundo

Cc: Michelle Mosca, Principal Planner, Collier County Comprehensive Planning Department

Minutes from the 3/19/14 Immokalee CRA Advisory Board Meeting:

CRA Old Business

a. CP-2013-8 Proposed Amendment to the IAMP for large scale retailer - Q&A (Enc 5)

CRA staff provided board with a hard copy and email copy of the new back-up documentation in the application packet for the large scale retailer. Mr. Wayne Arnold reported that his firm updated the economic impact data in their packet and that the application would now go before the Collier County Planning Commission on Tuesday, April 29, 2014 at 5:00 PM at the Immokalee High School auditorium. Notices will be sent out to residents within 500 ft. of the property and signs will be posted at the site location.

The Collier County Growth Planning Department staff will provide translators at the meeting and will be sending out the meeting notice.

Board Comments:

- Floyd Crews would like to see road improvements on the corner of Westclox Road and State Road 29.
- Frank Nappo supports the proposed amendments and he informed the board, public and staff that 125 families that live within the Immokalee Housing and Family Services area would benefit from a large retailer in their area.
- Carrie Williams said she took a poll from her local bank and all were in support their only concern was traffic congestion and the cleanliness of the area. They said that most businesses in Immokalee don't keep up with the upkeep regarding the façades of their building and the parking lot areas.
- Estil Null supports the proposed amendments but would like to know if roads are sufficient to handle a large retailer.

Public Speakers on this item:

- Paul Midney said he was in support of the proposed amendment.
- Armando Yzaguirre who works with A & M Maintenance is in support of the proposed amendment.
- Danny Gonzalez who owns Lozano's Restaurant in Immokalee is in support of the proposed amendment. He said that his family is expanding the restaurant and encourages competitive business.

Action: Mr. Nappo made a motion to support CP-2013-8 Proposed Amendment to the Immokalee Area Master Plan for the large scale retailer. Ms. Williams seconded the motion and the motion passed by unanimous vote 7-0.

Action: Mr. Crews made a motion that the Advisory Board send a letter to the Collier County Planning Commissioner to voice concern over the road traffic congestion that will be coming from CP-2013-8 Proposed Amendment to the Immokalee Area Master Plan for larger scale retailer. Mr. Nappo seconded the motion and the motion passed by unanimous vote 7-0.

Other areas of concern that were discussed by the board were adding a stop light and a merge lane from New Market Road to SR 29. They would also like to see the MSTU triangle area either moved or made smaller.