

1.5.J - Brief Assessment of Successes & Shortcomings – Immokalee Area Master Plan Element

A. Introduction & Background:

The Immokalee Area Master Plan (IAMP) is an “optional element,” under Section 163.3177(7), Florida Statutes. As such, there are no specific criteria to guide the format and purposes of this Element. The Immokalee Area Master Plan was originally developed, as mandated by (1988) Policy 6.4 of the Future Land Use Element of the Collier County Growth Management Plan.

Work on the original Master Plan began with the appointment of a Technical Advisory Committee in November 1988. An initial public workshop was held in February 1989, and subsequent informational workshops were held periodically, thereafter. The Collier County Board of County Commissioners adopted the Immokalee Area Master Plan, as an element of the County’s Growth Management Plan, on February 5, 1991. The first set of amendments to the plan, involving changes to both the text and the Immokalee Future Land Use Map, were adopted in 1993.

In 1996, based upon recommendations contained in Collier County’s adopted Evaluation and Appraisal Report (EAR), staff initiated amendments to the Immokalee Area Master Plan. Unlike the 1988 – 1991 process, the process initiated in 1996 did not involve an advisory committee specific to the Immokalee Area. Instead, the proposed IAMP amendments were formulated and reviewed by staff, aided by an Evaluation & Appraisal Report Advisory Committee, which also helped staff formulate and review amendments to other Elements of the Growth Management Plan. The EAR-based amendments affected virtually the entire Immokalee Area Master Plan, including the Immokalee Area Future Land Use Map. Various subdistrict boundaries were revised and two new subdistricts were created. Based upon the EAR recommendations, in October of 1997, the Board of County Commissioners adopted an Ordinance enacting the revised Master Plan.

Currently, County staff is working with a second advisory Committee, the Immokalee Area Master Plan Restudy Committee, to review proposed changes to the Immokalee Area Master Plan.

B. Objective Analysis:

GENERAL:

The Goal, Objective and Policy numbering system used within the Immokalee Area Master Plan uses Roman Numerals to denote the Goals. This system dates back to the 1989 Growth Management Plan (GMP) and is no longer used in the majority of the County’s GMP Elements and sub-elements. Therefore, the County will recommend (in the EAR-based amendments) that the IAMP’s numbering system be reformatted for consistency with the rest of the GMP.

Although there are seven goal areas within the Immokalee Area Master Plan, the last Goal is denoted as VIII. This misnumbering was apparently a result of the 1997 EAR-based Amendments and was never corrected. This Goal will be changed to 7 as part of the EAR-based amendments.

(The following Objective and policies are part of the IAMP's Goal Area I. As noted below, the County proposes to delete this entire Goal Area.)

OBJECTIVE I.1:

Provide accurate annual estimates of the housing units and the population residing in the Immokalee community.

Objective Achievement Analysis:

Objective I.1 contains policies that outline the methodology for establishing and maintaining demographic information relative to the Immokalee Area Master Plan. Within this Goal Area there is one Objective and two Policies. Objective I.1 requires the preparation of annual population and housing projections for the Immokalee Area. Policy I.1.1 relates the annual demographic projections to adequate housing and public facility Levels of Service (LOS). Policy I.1.2 lists entities that County staff may gather demographic information from. In regard to demographics, County Comprehensive Planning staff employs a standardized methodology to develop annual demographic projections for all areas of Collier County, including Immokalee. This analysis is more sophisticated than the guidelines contained within the two policies described above. Therefore the County is recommending that the Ear-based amendments to the IAMP include deletion of this entire Goal Area (the Objective and its related Goal and Policies).

Policy Relevance:

The two policies discussed above were reviewed for relevance to current Comprehensive Planning staff demographic methodologies. The current staff analysis methods are more sophisticated than the guidelines contained within Policies I.1.1 and I.1.2. Therefore, these policies, along with the Objective and Goal, will be deleted.

(Note: The following Objectives are part of Goal Area II of the Immokalee Area Master Plan. Goal II deals with a number of facets of the Immokalee Community, such as quality of life, natural beauty, environmental features and stable neighborhoods. The current Goal also specifically recognizes the Community's status as a "hub" for the surrounding agricultural area. The County's Immokalee Area Master Plan Restudy Committee has recommended that this Goal be revised to reflect the area's status as a tourist destination and the Port of Entry status of the Immokalee regional Airport.)

OBJECTIVE II.1:

Unless otherwise permitted in this Master Plan for Immokalee, new or revised uses of land shall be consistent with designations outlined on the Future Land Use Map. The Future Land Use Map and companion Future Land Use Designations, Districts and Subdistricts shall be binding on all Development Orders effective with the adoption of the Master Plan for Immokalee. Through the magnitude, location and configuration of its components, the Future Land Use Map is designed to coordinate land use with the natural environment including topography, soil and other resources; maintain and develop cohesive neighborhood units; promote a sound economy; and discourage undesirable growth and development patterns. (This objective shall supersede Objective 1 in the Countywide Future Land Use Element of the Growth Management Plan.)

Objective Analysis:

Objective II.1 also includes the Land Use Designation Section. Objective II.1 requires new land uses in Immokalee to be consistent with the Land Use Designations contained on the Immokalee Area Future Land Use Map. The County is recommending that the IAMP's Future Land Use Designations be moved to a completely separate section of the Element (outside of the Goals, Objectives and Policies, but still within the Implementation Section. Additionally, if current Goal I is deleted, the current Goal II would become Goal I, thus the Objective numbering would change.

With regard to the Future Land Use Designation Description Section of this Objective, it should be noted that, within the format used by the County's Growth Management Plan, these Future Land Use Designations (including both the map designation and the text) have the legal force of the Goals, Objectives and Policies. Therefore, the Future Land Use Designation Description Section is discussed in this report.

Policy Relevance:

Policy II.1.1 is the list of Future Land Use Designations for the Immokalee Future Land Use Map and Land Use Designation Section. Policy II.1.2 relates future development in Immokalee to the County's Adequate Public Facilities Ordinance. Policy II.1.3 requires vegetative or open space buffers or berms between low intensity and high intensity land uses. Policy II.1.4 requires certain types of land uses to be located within a reasonable walking distance of residential areas. Policy II.1.5 allows continuance of agricultural activities within the Immokalee Urban Area. Policy II.1.6 requires preparation of a zoning overlay for the South Immokalee Redevelopment Area. With regard to this last policy, it appears to be outdated. The whole Immokalee Community is currently a designated redevelopment area. Therefore, Policy II.1.6 should be deleted. Finally, this Section should contain a new Policy reflecting recent interlocal agreements between the Board of County Commissioners and the Collier County School Board.

LAND USE DESIGNATION DESCRIPTION SECTION:

Within the Immokalee Area Master Plan, the Land Use Designation Section follows Policy II.1.6. This Section divides the Immokalee Area, via the Future Land Use Map, into three overall designations: Residential, Commercial and Industrial. There is also a subsection regarding Overlays and Special Features. Within each designation are one or more “Districts.”

Regarding the Residential Designation, the Plan states:

“This designation is intended to accommodate a variety of residential land uses including single-family, duplexes, multi-family, and mobile homes, which does not preclude seasonal, temporary and migrant farmworker housing.”

There are three Districts within the Residential Designation. These are:

Low Residential District: The purpose of this designation is to provide for a low-density residential district. The maximum allowable density is 4 units per acre.

Mixed Residential District: The purpose of this designation is to provide for a mixture of housing types within medium density residential areas. The maximum allowable density is 6 units per acre.

High Residential District: The purpose of this designation is to provide for a district of high-density residential development. The unit types within this District are limited solely to multi-family structures. The maximum allowable density is 8 units per acre.

Both the Low Residential District and the Mixed Residential District allow mobile homes, as these units form a significant percentage of the housing stock in Immokalee. All three residential districts allow certain non-residential uses, including parks, open space and recreational uses, churches, libraries, cemeteries, public and private schools, day-care centers and essential services as defined in the Collier County Land Development Code.

The Residential Designation is followed by a description of the County’s Density Rating System, as it applies to the Immokalee Area. In the IAMP, the system is limited to Density Bonuses. This system allows a residential project, or the residential portion of a mixed-use project, to request increased residential density (i.e., the number of units allowed per acre) if the project meets certain criteria. There are four density bonus provisions. A project may be eligible for any number or combination of these bonuses (or not). The four bonus provisions are:

Proximity to Neighborhood Center and Commerce

For a discussion of Neighborhood Centers and the Commerce Center Mixed-Use District, see below. If 50% or more of a project is within a Neighborhood Center or the Commerce Center-Mixed Use District, then the maximum density allowed within the

Neighborhood Center or Commerce Center-Mixed Use District of twelve (12) units per acre can be averaged in with the density of the portion of the project outside of the Neighborhood Center for the entire project. At the May 17, 2004 Joint Board of County Commissioners/Collier County Planning Commission Workshop, the joint Commissions voted to eliminate all relevant density bonus provisions except that for Affordable Housing. Therefore, this provision will be deleted.

Affordable Housing

Provision of Affordable Housing as defined in the Housing Element would add eight (8) dwelling units per gross acre above the maximum density of the district; however, no density may exceed sixteen (16) units per acre. Sixteen (16) units per acre is the maximum allowable density within Collier County's Urban Areas.

Residential In-Fill

To encourage residential in-fill, three (3) residential dwelling units per gross acre may be added if the following criteria are met: the project is ten (10) acres or less in size; at the time of development, the project will be served by central public water and sewer; at least one abutting property is developed; the project is compatible with surrounding land uses; the property in question has no common site development plan with adjacent property; there is no common ownership with any adjacent parcels; and the parcel in question was not created to take advantage of the in-fill residential density bonus and was created prior to the adoption of this provision in the Growth Management Plan on January 10, 1989. At the May 17, 2004 Joint Board of County Commissioners/Collier County Planning Commission Workshop, the joint Commissions voted to eliminate all relevant density bonus provisions except that for Affordable Housing. Therefore, this provision will be deleted.

Roadway Access

If the project has direct access to two (2) or more arterial or collector roads or if there is project commitment for provision of interconnection of roads with existing or future adjacent projects, one (1) residential dwelling unit per gross acre may be added above the maximum density of the surrounding district. At the May 17, 2004 Joint Board of County Commissioners/Collier County Planning Commission Workshop, the joint Commissions voted to eliminate all relevant density bonus provisions except that for Affordable Housing. Therefore, this provision will be deleted.

The above provisions are followed by a discussion of Density and Intensity Blending. This is a new section of the Immokalee Area Master Plan, resulting from creation of the Rural Lands Stewardship Area Overlay (RLSA Overlay) in the Countywide Future Land Use Element (FLUE). If a residential project includes portions of the RLSA and certain specific portions of the Immokalee Urban Area, it may be eligible to blend the residential density and/or commercial intensity allowed within the RLSA with the same parameters as allowed in the Urban Area. This provision allows RLSA credits to be utilized to

support development within Immokalee. For further discussion of the RLSA, please see the analysis of the Future Land Use Element, as contained in this report.

The Density and Intensity Blending provision is followed by discussion of the Commercial Designation. This designation is described as follows:

“The designation is intended to accommodate a variety of commercial land uses including neighborhood oriented commercial uses, commerce center uses, general highway commercial and commercial development within Planned Unit Developments. Migrant Labor Camps are also permitted within the Commercial designations.”

There are four (4) districts within the Commercial Designation. These are:

Commercial District

The purpose of this designation is to provide for retail, office, transient lodging facilities and highway commercial that serve the needs of the traveling public generally C-1 through C-4 Commercial Zoning Districts as identified in the Land Development Code. These commercial uses must be located on a major arterial or collector roadway.

Neighborhood Center District

The purpose of this land use classification is to provide for centers of activity that serve the needs of the surrounding neighborhoods. The centers should contain a mix of neighborhood-oriented uses such as day care center, parks, schools, and governmental activities. Specific criteria apply to the uses allowed within this District.

Commerce Center – Mixed Use District

The purpose of this designation is to create a major activity center that services the entire Immokalee Urban Designated Area and surrounding agricultural area. Accordingly only one such area is displayed on the Future land Use Map. The Mixed-Use District shall function as an employment center and shall encourage commercial and institutional uses. Uses permitted within this Subdistrict shall include shopping center, governmental institutions, middle or high school, Community Park and other employment generating uses. Other permitted commercial uses shall include transient lodging facilities at 26 dwelling units per acre. The appropriate zoning districts include C-1 through C-4 as identified in the Land Development Code.

Planned Unit Development Commercial District

This designation permits commercial planned unit developments (PUDs) within Immokalee, provided that certain size and development criteria are met.

Recreational/Tourist District

This District was created as part of an amendment adopted in 2003. The purpose of this District is to provide centers for recreational and tourism activity that utilizes the natural environment as the main attraction. The centers should contain low intensity uses that attract tourists and residents while preserving the environmental features of the area. Uses permitted in this district include: passive parks, nature preserves; wildlife sanctuaries; open space; museums; cultural facilities; marinas; transient lodging facilities including: hotel/motel, rental cabins, bed & breakfast establishments, campsites, restaurants; recreational vehicles; sporting and recreational camps; low-intensity retail; single family homes; agriculture; and those essential services as defined in the Land Development Code. Geographically, this District includes the northwest shoreline of Lake Trafford, including the existing Lake Trafford Marina. The County is recommending increasing the number of hotel/motel rooms per acre allowed within this District.

Except for the Commercial District, the Commercial Designation allows residential development, subject to specific criteria for each District. The Designation also allows non-commercial and non-residential uses, such as parks, open space and recreational uses, churches, libraries, cemeteries, public and private schools, day-care centers and those essential services as defined in the Land Development Code.

The Industrial Designation is intended to accommodate a variety of industrial land uses such as Industrial, Commerce Center - Industrial, and Business Parks. There are three districts within this designation.

Industrial District

The purpose of this designation is to provide industrial type uses including those uses related to light manufacturing, processing, storage and warehousing, wholesaling, distribution, packing houses, recycling, high technology, laboratories, assembly, storage, computer and data processing, business services, limit commercial such as child care centers, and restaurants and other basic industrial uses but not including retail, as described in the Land Development Code for the Industrial and Business Park Zoning Districts. Accessory uses and structures customarily associated with the uses permitted in this district, including offices, retail sales, and structures, which are customarily accessory and clearly incidental and subordinate to permitted principal uses and structures are also permitted. Although the Immokalee Regional Airport is geographically contained within the Industrial District, "airport" is not listed as an allowable use within this District. The County recommends including the airport as an allowed use within the Industrial District. Similarly, the County is also recommending that the drag racing strip and campground, currently existing on the airport property through expired temporary use (TU) permits, be listed as allowed uses within Industrial District.

Commerce Center – Industrial District

This District includes the portion of the Immokalee Core Area located adjacent to the southwest corner of the Immokalee Airport property, as well as a portion of the Airport property, itself. The purpose of this District is to create a major Activity Center that serves the entire Immokalee Urban Designated Area and surrounding agricultural area. The Industrial District shall function as an employment center and shall encourage industrial and commercial uses as described in the Land Development Code for the Commercial (C-1 through C-5), Industrial and Business Park Zoning Districts. Higher intensity commercial uses including packinghouses, industrial fabrication operation and warehouses shall be permitted within this District. Accessory uses and structures customarily associated with the uses permitted in this district, including offices, retail sales, and structures, which are customarily accessory and clearly incidental and subordinate to, permitted principal uses and structures are also permitted.

Business Park District

Business Parks are intended to include a mix of industrial uses and offices designed in an attractive park-like environment with low structural density where building coverage ranges between 25% to 45% and where large landscaped areas provide for buffering and enjoyment by the employees and patrons of the Park. The District also contains specific land use and access criteria.

The Industrial Designation does not permit residential development. It does permit commercial uses, subject to specific criteria for each District. Finally, the designation also allows essential services.

The Immokalee Area Master Plan Land Use Designation Description section also contains a subsection dealing with Overlays and Special Features. Currently, the subsection includes one overlay, the Urban Infill and Redevelopment Overlay. This Overlay includes the entire Immokalee Urban Area and essentially recognizes the existence of the Immokalee Community Redevelopment Area Designation. This Overlay has no regulatory effect.

Section Relevance:

As part of this EAR Report, the County recommends that the Urban Infill and Redevelopment Overlay be replaced with a new Overlay containing development criteria and/or incentives concerning redevelopment in the Immokalee Area. The County also recommends that the entire Land Use Description Section be relocated to a different portion of the IAMP Implementation Section.

OBJECTIVE II.2:

By 2005, improve the physical appearance of the commercial building stock by 10% in the Main Street Program area.

Objective Achievement Analysis:

This objective refers to the now defunct “Main Street Program” in Immokalee, and requires that the appearance of commercial buildings in the Main Street Program Area be improved by 10%, with a target date of 2005. The County is recommending that the goals and objectives of the old Main Street Program be incorporated into the IAMP. Also, the reference to a percentage of improvement should be dropped as it has an unclear meaning in this context.

Policy Relevance:

Policy II.2.1 refers to the “Building Immokalee Together Program.” “Building Immokalee Together” was the name given to the successful application for creation of Immokalee’s current Federal Enterprise Zone Designation. The current policy will be deleted. The County will then develop a new policy that calls for the development of a plan for the Main Street Corridor. Policy II.2.2 requires County staff to investigate alternative funding for the two referenced community programs. Since the Main Street Program is defunct and the Enterprise Zone Program is an independent, not-for-profit entity, this policy should be revised to delete reference to these programs. Also, the revised policy should call for the County to seek partnerships with appropriate non-profit agencies in order to implement the redevelopment activities.

OBJECTIVE II.3:

Encourage innovative approaches in urban and project design which enhance both the environment and the visual appeal of Immokalee.

Objective Achievement Analysis:

This Objective is intended to refer to the built environment, as opposed to the natural environment. However, such an interpretation only becomes apparent from a reading of the subject Objective’s policies. This Objective should be rewritten for clarity. A review of the relevant policies (see below) reveals the need for updated language to reflect changes in County programs and initiatives.

Policy Relevance:

Policy II.3.1 requires County staff to identify alternative funding sources for streetscaping and pedestrian/bicycle activities. The policy also references the Main Street Program. The policy has a target date of 1998. As part of the EAR-based amendments, the County recommends that this policy be revised and updated. Policy II.3.2 allows the Board of County Commissioners to direct staff to amend the IAMP to enable development of projects that clearly benefit low and moderate-income residents of Immokalee. This policy is unnecessary, as the Board has the ability to take such action in any case. Therefore, this policy should be deleted.

OBJECTIVE II.4:

Provide land use designations, criteria and zoning which recognize the needs of that significant portion of Immokalee's population which is primarily pedestrian in nature.

Objective Achievement Analysis:

A review of the single policy contained within this Objective reveals that the Objective's focus is on the completion of a Bicycle/Pedestrian Plan for Immokalee. The Objective should be rewritten for clarity and to reflect current County programs.

Policy Relevance:

Within this Objective is Policy II.4.1, which requires completion of a Bicycle and Pedestrian Plan consistent with the goals of the Building Immokalee Together Project and the Main Street Project. The County recommends rewriting this policy to delete reference to the two programs and to reflect current County programs. The County is also proposing to add two new policies relative to this Objective. These policies would reference the County's Pathways Advisory Committee and call for "pedestrian-friendly" development/redevelopment practices.

OBJECTIVE II.5:

Recognizing the increasing need for farm labor, to ensure an adequate number of decent, safe, healthful, and affordable housing units for farm workers in Immokalee, sites for housing for farm workers which complies with section 10D-25 of Florida's Administrative Code and the Housing Code of Collier County shall be designated so as to keep pace with the population.

Objective Achievement Analysis:

Objective II.5 requires farm labor housing in Immokalee to comply with section 10D-25 of the Florida Administrative Code, as well as applicable portions of the County Codes. Within this Objective are two policies. Enforcement is conducted via Collier County Code Enforcement Regulations. This Objective should be rewritten for clarification and to reference the appropriate section of the Collier County Land Development Code (LDC).

Policy Relevance:

Policy II.5.1 allows seasonal worker housing within any Land Use District that allows residential uses. Policy II.5.2 allows farm labor camps within commercial districts, subject to certain criteria. Both of these policies should be retained with some changes for purposes of clarification.

(Note: The following Objectives and Policies are part of IAMP Goal Area III. This goal area deals with the character of the Community. The County has proposed minor changes to the text of the Goal, for clarity.)

OBJECTIVE III. 1:

Collier County shall promote the conservation and rehabilitation of housing in Immokalee neighborhoods.

Objective Achievement Analysis:

Objective III.1 is a commitment by the County to “promote the conservation and rehabilitation of housing in Immokalee neighborhoods.” This Objective contains two policies. The intended purpose of this Objective is to prevent or remove blighted conditions through the rehabilitation of existing housing stock. This Objective will be retained. However, Policy III.1.1, within this Objective goes somewhat further as it gives priority to public facility expansions and improvements that “enhance or maintain the viability of existing urban residential areas.” Until recently, County staff did not have a mechanism to gauge whether County activities in Immokalee had complied with this Objective. However, the Collier County Financial Administration & Housing Department has recently (late 2003) initiated a “Housing Stock Inventory Survey.” The Survey has recently been completed in Immokalee, and will eventually cover the entire County. The purpose of the survey is to assess the condition of housing within the County and determine needed improvements, repairs or condemnations.

Policy Relevance:

Policy III.1.1 requires that expansion of urban facilities and services “should enhance or maintain the viability of existing urban residential areas.” This policy should be retained. Policy III.1.2 requires the County to use a combination of code enforcement and capital improvements to remove blighted conditions from the Community. This policy should be retained, with minor changes for purposes of clarity. The Immokalee Area Master Plan Restudy Committee has recommended the addition of a new policy that would ensure that government support activities with regard to housing continue to meet the needs of the Immokalee Community.

OBJECTIVE III.2:

Collier County will respond to the housing needs identified in the housing study of Immokalee by county initiatives which will reduce the cost of housing development for low and very low income households.

Objective Achievement Analysis:

Objective III.2 requires the County to reduce the cost of housing development for low and very-low income Immokalee residents through the development of County initiatives. This Objective has one policy. The County recommends that the Objective be updated to reflect the recently completed “Housing Stock Inventory Survey.”

Policy Relevance:

The County is recommending the creation of a new policy that requires the County to employ the data gathered through the “Housing Stock Inventory Survey” to improve housing conditions in Immokalee. Current Policy III.2.1 requires the County to “pursue research into initiatives such as land banking of foreclosed land due to County held liens, land grants from County and other public holdings, as well as tax incentives for private owners who commit to development for affordable housing for very low and low income families.” The County proposes to broaden this policy to apply to housing for “working class families.”

OBJECTIVE: III.3:

By January 1998 the County will have in place a pilot plan of innovative programs and regulatory reforms to reduce the costs of development and maintenance of safe, healthful, and affordable housing for low and very low income households in Immokalee.

Objective Achievement Analysis:

Objective III.3 requires that the County establish programs and regulatory reforms designed to reduce development and maintenance costs for affordable housing in Immokalee. The Objective has a target date of 1998. This Objective should be updated with a revised date. Also, the County recommends broadening this Objective to apply to “working class families.”

Policy Relevance:

This Objective has five (5) policies. Policy III.3.1 requires Community Development Services staff to develop two pre-approved housing plans (as in blueprints, building plans, etc.) by 1997. This policy has not been accomplished. Rather, the County’s Financial Administration & Housing Department has worked with non-profit agencies and affordable housing developers to actually fund and construct affordable housing in the Immokalee Area. This policy should be deleted. Policy III.3.2 requires the County Attorney’s Office to determine the feasibility of deferring ad valorem and/or special tax assessments on new apartment developments in Immokalee. This policy has a deadline of 1998. The policy was never implemented. The County intends to replace this policy with a policy that references various economic development initiatives that were adopted by the County in November 2003. Among these is a tax deferral program. Policy III.3.3 requires County staff to develop a networking strategy to place affordable housing developers in contact with potential residents. This activity is ongoing. The policy needs to be updated to reflect changes to County Agency Names. The County is also revising the policy to stress both the affordability and availability of housing in the Community. Policy III.3.4 concerns the demolition or alleviation of unsafe housing through Code Enforcement Action. This activity has been ongoing for approximately three years. For more on this program, please see the Major Issues Section. The County is recommending minor revision of this policy for purposes of clarification. Policy III.3.5 requires County staff to “research and develop strategies to replace and provide affordable housing

through non-profit providers in and around the South Immokalee area that is compatible with the Redevelopment Plan.” In this regard, the South Immokalee Redevelopment Area was absorbed into a larger redevelopment area that includes the whole community. However, the County does maintain agreements with non-profit housing entities in the Immokalee Area. The Financial Administration & Housing Department has partnered with the Empowerment Alliance of Southwest Florida (Urban Infill grant, CDBG, state HOME & SHIP) to build 26 affordable housing units in the South Immokalee Area. The recently completed Housing stock inventory survey will also provide data that is necessary to upgrade and/or replace current housing stock. This data will be used in the Consolidated Plan (CDBG & HOME) for housing strategies.

OBJECTIVE III.4:

There shall be an annual effort to coordinate with federal, state, local, and private agencies to seek funding to meet the housing needs as identified in the Housing Element of the Comprehensive Plan and to assure consistency with federal, state, and local regulations in regards to migrant land camps.

Objective Achievement Analysis:

Objective III.4 requires the County to make “an annual effort to coordinate with federal, state, local, and private agencies to seek funding to meet the housing needs as identified in the Housing Element of the Comprehensive Plan and to assure consistency with federal, state, and local regulations in regards to migrant land camps.” There are four (4) policies within this Objective. The Objective, in general, reflects ongoing activities. However, it needs to be revised to reflect current County programs and initiatives. The County also recommends revising this Objective to refer to the “Collier County Growth Management Plan,” instead of the comprehensive plan.

Policy Relevance:

Policy III.4.1 requires County Housing staff to meet with representatives of the Federal Rural Economic Development Administration “to improve the County's ability to attract more government grants and loans to develop housing for very low and low-income households.” The County recommends revising this policy to reflect the current name of the County’s affordable housing agency and to refer to “working class families.” Policy III.4.2 requires the County to revise the Collier County Land Development Code (LDC) to adopt health codes relative to migrant camps. The target date for this policy is 1998. The target date for this policy should be revised. Policy III.4.3 requires the County Manager to prepare an annual report on conditions in migrant camps. This has never been done. The County recommends retaining this policy with some minor revisions for clarification. The Policy III.4.4 requires County staff to work with “all private groups seeking to furnish shelters for the homeless, and/or abused women and children in Immokalee.” This activity is ongoing. This policy should be retained.

OBJECTIVE IV.1:

The County shall protect and preserve natural resources within and adjacent to the Immokalee Urban Designated Area in accordance with the Growth Management Plan.

Objective Achievement Analysis:

This is the sole Objective within the Immokalee Area Master Plan's "Conservation" Goal Area (Goal IV). The Objective currently has only one (1) policy. The Objective contains no specific guidelines for natural resource protection within Immokalee. Also, the Objective requires revisions consistent with the provisions of the Rural Lands Stewardship Area Overlay of the Future Land Use Element. The County will retain this Objective with revisions to the existing policy and the addition of a new policy.

Policy Relevance:

Policy IV.1.1 requires a periodic update of the IAMP, to keep pace with new programs and provisions contained in the Conservation and Coastal Management Element. The IAMP has not been previously revised for this purpose. The County recommends revising current Policy IV.1.1 to reflect the correct name of the Element (Immokalee Area Master Plan). Also, the County proposes to create an additional policy related to County services and facilities concerning the conservation and management of natural resources in the Immokalee Area.

(Note: The following Objectives and Policies are contained within current Goal Area V of the IAMP, which is concerned with recreational opportunities. The County recommends rewriting the language of the subject Goal for purposes of Clarity.)

OBJECTIVE V.1:

Collier County shall implement a parks and recreation program for Immokalee that is equivalent to Collier County standards, taking into consideration plans that reflect citizens' recreational preferences and offer recreational opportunities to all age groups.

Objective Achievement Analysis:

This is the only Objective under Goal V, which is concerned with Recreation. The Objective has two (2) policies. Objective V.1 requires the County to implement a parks and recreation program for Immokalee, equivalent to programs offered to other portions of the County. This has been done. The County will retain this Objective with a minor revision for grammatical purposes.

Policy Relevance:

Policy V.1.1 requires the creation of a five-year park plan for the Immokalee Area. The target date is 1998. County Parks & Recreation Department staff implements a countywide park and recreation program, which includes the Immokalee Area.

Therefore, this policy should be revised to require that the countywide plan address the specific needs of the Immokalee Area and to reflect a new target date. Policy V.1.2 encourages park location within designated Neighborhood Centers. There are five existing Neighborhood Centers, none of which contain a park. However, two of the designated Centers contain recreational facilities associated with public schools. The Collier County Parks & Recreation Department maintains public recreational activities at these schools, through an interlocal agreement with the School District. This policy should be revised to reflect the overall need for more parks and recreation programs in Immokalee, and not focus on Neighborhood Centers. The County is also recommending the creation of a new policy related to County services and facilities concerning parks and recreation in the Immokalee Area.

OBJECTIVE VI.1:

The County shall provide for the safe and convenient movement of pedestrians, motorized and non-motorized vehicles.

Objective Achievement Analysis:

This is the only Objective within the Master Plan's Transportation Goal Area. The Objective contains four policies. The Objective requires the safe movement of pedestrians, and both motorized and non-motorized vehicles. This is an ongoing task; therefore, the Objective remains relevant.

Policy Relevance:

Policy VI.1.1 requires the County Metropolitan Planning Organization (MPO) to complete a transportation study of Immokalee by September 1999. This policy indicates that the MPO is part of the Community Development & Environmental Services Administration (CDES). However, the MPO has since been moved to the Transportation Administration. The Immokalee Area Transportation Study was actually completed in 2002. Finally, the 5-year Bicycle Ways Plan referenced in the Policy has been superseded by the County's Pathways Plan. Therefore, the County recommends deletion of this policy. Policy VI.1.2 requires County staff to revise the 5-year schedule of Capital Improvement projects to reflect needed road improvements in Immokalee. This policy remains relevant and should be retained. Policy VI.1.3 requires the County's 5 Year Bicycle Ways Plan to reflect necessary improvements in Immokalee. The Collier County Pathways Plan has superseded this plan. Collier County MPO staff and the County's appointed Pathways Advisory Committee have expressed interest in establishing bicycle and pedestrian paths within Immokalee. Policy VI.1.3 should be revised to reference the proposed improvements contained in the Pathways Plan. Policy VI.1.4 requires proposed bicycle paths in Immokalee to be depicted on the Traffic Circulation Map of the Immokalee Area Master Plan. The Traffic Circulation Map is not part of the adopted Implementation Section of the IAMP. Therefore, it has no legal or planning relevance. Also, the policy references the 5 Year Bicycle Ways Plan, which is obsolete. The policy should be changed to reference the Pathways Plan, and to incorporate appropriate recommendations from that plan. The County is also recommending a new policy that

would require the County to ensure that the Immokalee Community’s sidewalks and bike paths keep pace with development of the area.

(Note: The following objective and policies are part of Goal Area VIII of the IAMP, which relates to economic development. The County is not proposing any change to the language contained in the Goal. The reader should also note that the IAMP currently has no Goal VII. As part of the EAR-based amendments, the entire set of Goals, Objectives and Policies contained in the IAMP will be renumbered and reformatted to Arabic numerals.)

OBJECTIVE VIII.1:

Prepare a plan for economic development for the Immokalee Area.

Objective Achievement Analysis:

This is the only Objective within the Economic Goal Area of the IAMP. As previously noted, this whole Goal Area is misnumbered. It should be VII instead of VIII. However, as the County is recommending a reformat of the entire Element, the numbering issue will be addressed at that time. The Objective contains five policies. Staff notes that the County has recently adopted a countywide Economic Element. This Goal, Objective and Policies should either be revised to be consistent with the Economic Element, or otherwise deleted. As to the Objective, the County recommends revising the language to emphasize the promotion of economic development opportunities rather than the preparation of an Immokalee Area economic development plan.

Policy Relevance:

Policy VIII.1.1 calls for the preparation of a countywide Economic Plan. This has been done. This policy should be deleted and replaced with a policy that recognizes the participation of the Immokalee Chamber of Commerce, the Collier County Airport Authority and the Economic Development Council of Collier County in the promotion of economic development in Immokalee. Policy VIII.1.2 requires the County to “promote the development of the Immokalee Airport and surrounding commercial and industrial areas as set forth in the Immokalee Airport Master Plan.” With regard to this Policy, the County's recommendation is to delete this policy. Further analysis is contained in Section 2.36 of this Evaluation & Appraisal Report. Policy VIII.1.3 promotes the designation of the Immokalee Area as a Federal Enterprise Zone. The target date is 1997. As the Community’s Enterprise Zone designation was successful, the County recommends deletion of this policy. Policy VIII.1.4 requires CDES staff and the Collier County Sheriff’s Department to pursue funding opportunities under the Federal “Safe Neighborhoods Act.” It also requires implementation of CPTED (Crime Prevention Through Environmental Design) principles in Immokalee. This policy has not been implemented consistently. Therefore, it should be retained. Policy VIII.1.5 calls for coordination between County and School District staffs to ensure that Immokalee residents have access to employment training programs. This policy should be retained. Also, the County is proposing a new policy regarding County implementation of economic development programs in Immokalee.