



Southwest Florida Regional Planning Council

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August 8, 2002

*9mm  
8-15-02*

Mr. D. Ray Eubanks  
Planning Manager  
Department of Community Affairs  
2555 Shumard Oak Boulevard  
Tallahassee, Florida 32399-2100



**Re: Collier County / DCA 02-R2**

Dear Mr. Eubanks:

The Southwest Florida Regional Planning Council received the proposed amendments (DCA 02-R2) to the Comprehensive Plan of Collier County. Council staff prepared a report that addressed the information provided in the proposed amendments and provided your office with a copy of the report on July 29, 2002.

The Council staff report was reviewed by Council as agenda item 4(b) at its meeting on August 8, 2002. The Council's official recommendations remained unchanged from the previously provided Council staff recommendations, but three typos were found by Council and staff was requested to make the necessary corrections to staff report. A copy of the official SWFRPC report and recommendations is attached.

Should you have any questions concerning this matter, please do not hesitate to contact David Crawford or myself.

Sincerely,  
Southwest Florida Regional Planning Council

David Y. Burr, AICP  
Interim Executive Director

DYB/DEC  
Attachment

cc: Stan Litsinger, Comprehensive Planning Manager, Collier County Planning Services Dept.

**LOCAL GOVERNMENT COMPREHENSIVE PLAN AMENDMENTS  
COLLIER COUNTY**

The Council staff has reviewed proposed amendments to the Collier County Comprehensive Plan known as the Rural Lands Growth Management Plan Amendments. These amendments are sometimes referred to as the "Eastern Lands" amendments. These amendments were developed under the Local Government Comprehensive Planning and Land Development Regulation Act. A synopsis of the requirements of the Act and Council responsibilities is provided as Attachment I. Staff comments are provided in Attachment II and Maps are provided in Attachment III.

Staff review of the proposed amendments was based on whether they were likely to be of regional concern. This was determined through assessment of the following factors:

1. Location--in or near a regional resource or regional activity center, such that it impacts the regional resource or facility; on or within one mile of a county boundary; generally applied to sites of five acres or more; size alone is not necessarily a determinant of regional significance;
2. Magnitude--equal to or greater than 80% of the county threshold for a development of regional impact of the same type (a DRI-related amendment is considered regionally significant); and
3. Character--of a unique type or use, a use of regional significance, or a change in the local comprehensive plan that could be applied throughout the local jurisdiction; updates, editorial revisions, etc. are not regionally significant.

A summary of the results of the review follows:

<u>Proposed Amendment</u>	<u>Factors of Regional Significance</u>			<u>Consistent with SRPP</u>
	<u>Location</u>	<u>Magnitude</u>	<u>Character</u>	
DCA 02-R2	yes	yes	yes	yes regionally significant

**RECOMMENDED ACTION:**

Approve staff comments. Authorize staff to forward comments to the Department of Community Affairs and Collier County.

**LOCAL GOVERNMENT COMPREHENSIVE PLANNING AND LAND  
DEVELOPMENT REGULATION ACT**

**Local Government Comprehensive Plans**

The Act requires each municipal and county government to prepare a comprehensive plan that must include at least the following nine elements:

1. Future Land Use Element;
2. Traffic Circulation Element;  
A local government with all or part of its jurisdiction within the urbanized area of a Metropolitan Planning Organization shall prepare and adopt a transportation element to replace the traffic circulation; mass transit; and ports, aviation, and related facilities elements. [9J-5.019(1), FAC]
3. General Sanitary Sewer, Solid Waste, Drainage, and Potable Water and Natural Groundwater Aquifer Recharge Element;
4. Conservation Element;
5. Recreation and Open Space Element;
6. Housing Element;
7. Coastal Management Element for coastal jurisdictions;
8. Intergovernmental Coordination Element; and
9. Capital Improvements Element.

The local government may add optional elements (e. g., community design, redevelopment, safety, historical and scenic preservation, and economic).

All local governments in Southwest Florida have adopted revised plans:

Charlotte County, Punta Gorda  
Collier County, Everglades City, Marco Island, Naples  
Glades County, Moore Haven  
Hendry County, Clewiston, LaBelle  
Lee County, Bonita Springs\*, Cape Coral, Fort Myers, Fort Myers Beach, Sanibel  
Sarasota County, Longboat Key, North Port, Sarasota, Venice

\* A newly incorporated local government must establish a local planning agency within one year after incorporation, and prepare and adopt a comprehensive plan within three years after the date of incorporation. The County comprehensive plan shall be deemed controlling until a municipality adopts a comprehensive plan. (s.163.3167 (4), Florida Statutes)

## Comprehensive Plan Amendments

A local government may amend its plan twice a year. (Amendments related to developments of regional impact, certain small developments, compliance agreements, and the Job Siting Act are not restricted by this limitation.) Six copies of the amendment are sent to the Department of Community Affairs for review. A copy is also sent to the regional planning council, the water management district, the Florida Department of Transportation, and the Florida Department of Environmental Protection.  
[s. 163.3184(3)(a)]

The proposed amendment will be reviewed by DCA in two situations. In the first, there must be a written request to DCA. The request for review must be received within forty-five days after transmittal of the proposed amendment. [s. 163.3184(6)(a)] Review can be requested by one of the following:

- the local government that transmits the amendment,
- the regional planning council, or
- an affected person.

In the second situation, DCA can decide to review the proposed amendment without a request. In that case, DCA must give notice within thirty days of transmittal.  
[(s. 163.3184(6)(b))]

Within five working days after deciding to conduct a review, DCA must forward copies to various reviewing agencies, including the regional planning council. [s. 163.3184(4)]

### Regional Planning Council Review

The regional planning council must submit its comments in writing within thirty days of receipt of the proposed amendment from DCA. It must specify any objections and may make recommendations for changes. The review of the proposed amendment by the regional planning council must be limited to "effects on regional resources or facilities identified in the strategic regional policy plan and extra-jurisdictional impacts which would be inconsistent with the comprehensive plan of the affected local government." [s. 163.3184(5)]

After receipt of comments from the regional planning council and other reviewing agencies, DCA has thirty days to conduct its own review and determine compliance with state law. Within that thirty-day period, DCA transmits its written comments to the local government.

**NOTE: THE ABOVE IS A SIMPLIFIED VERSION OF THE LAW. REFER TO THE STATUTE (CH. 163, FS) AND THE RULE (9J-11, FAC) FOR DETAILS.**

**SWFRPC COMMENTS**  
**Collier County Comprehensive Plan Amendments**

**Introduction**

Collier County has proposed to amend its Comprehensive Plan to provide for the Eastern Lands Portion of the Rural and Agricultural Assessment-based Growth Management Plan amendments. The proposed amendment is to the Future Land Use Elements (FLUE) and Future Land Use Map (FLUM) of the Comprehensive Plan.

Portions of these proposed amendments were based upon the Assessment of the Eastern (Rural) Lands portion of the County's Agricultural/Rural and Conservation designated areas. Based on the County's statements the amendments are intended to address the Final Order (AC-99-002) requirements for these Eastern Lands.

**County Approvals**

The following paragraphs address specific requirements of Rule 9J-11.006, F.A.C.:

The Collier County Planning Commission / Local Planning Agency (LPA) held a public hearing on the amendments and recommended transmittal of its recommendations to the Board of County Commissioners on May 24, 2002.

The Collier County Board of County Commissioners reviewed the proposed amendments approved them by the adoption of Resolution 2002-273, as the Local Governing Body, for transmittal to DCA on June 12, 2002.

**PROPOSED AMENDMENT**

**Background and Purpose of the Amendment**

Pursuant to the Final Order imposed by the Governor and Cabinet on June 22, 1999, the State of Florida has mandated certain revisions to Collier County's Growth Management Plan. The Final Order directs the County to conduct a Rural and Agricultural Area Assessment (the "Assessment") to collect the appropriate data, gather public input and to develop amendments to the Growth Management Plan. Major issues to be addressed by the Assessment include: protecting wetlands, wildlife and their habitats; protecting prime or unique agricultural land from premature conversion to other uses; and, assessing the growth potential of the Area by assessing the potential conversion of these rural lands to other uses, in appropriate locations. All of this is to occur while discouraging urban sprawl, directing incompatible land uses away from critical habitat and encouraging development that utilizes creative land use planning techniques. The Final Order acknowledges there must be there must be a balance between meeting these regulatory

requirements and protecting private property rights. The creative techniques may include, but not be limited to, public and private schools, urban villages, new towns, satellite communities, area-based allocations, clustering and open space provisions, and mixed-use development.

The Final Order allows the County to conduct the Assessment in phases. Accordingly, Collier County has divided the Assessment into two geographical areas –the Rural Fringe Area (previously reviewed by Council in May) and the Eastern Lands Area, also known as the “Immokalee Area Study” (and sometimes referred to as the “Rural Lands Area”). The Final Order requires that the County adopt Growth Management Plan Amendments developed as a result of the Assessment process by Jun 22, 2002, excluding the “Eastern Lands Area”, for which adoption of the amendments is required by November 1, 2002.

### **Study Area Description**

The Eastern Lands portion (Immokalee Area Study) of the Rural Assessment encompasses approximately 195,000 +/- acres, the vast majority supporting agricultural land uses. Approximately 113,000 acres (58% of the area) is classified as Agriculture with infrastructure. Grazing leases account for another 63,600 acres (33%). Public lands account for approximately 13,000 acres (7%). Other land uses such as residential, commercial, mining, etc. account for only 3,600 acres (2%). Water accounts for 2,000 acres (1%).

As to the land cover classifications in the Study Area, wetland land cover comprises 74,900 acres (38% of the area’s land cover), and includes 19,200 acres of permitted agricultural water retention areas; uplands comprise 20,300 acres (10%); agriculture land cover was mapped at 93,800 acres (48%); and, other land cover classifications account for 6,000 acres (3%).

Within the Study Area, the major Public areas are the Corkscrew Marsh (Corkscrew Regional Ecosystem Watershed Lands) and the Okaloacoochee Slough State Forest. Existing preservation lands account for approximately 7% of the Study Area. The Florida Panther National Wildlife Preserve occurs along the southern boundary of the Study Area. Privately held lands account for approximately 182,300 acres (93%).

The interim Natural Resource Protection Areas (NRPAs) comprise approximately 41,000 acres (21% of the area). An objective of the Assessment was to evaluate the interim NRPAs as suitable natural resource protection mechanisms for the Study Area. The interim NRPAs and Study Areas approved by the Collier County Board of County Commissioners in November 1999 were evaluated in the Immokalee Study Area. The Study has recommended the interim NRPAs be replaced by delineation of Flow way Stewardship Areas (FSAs), Habitat Stewardship Areas (HSAs), and Water Retention Areas WRAs). These areas total 85,000 acres.

## Rural Lands Stewardship Overlay Strategy

The primary basis for providing natural resource protection and addressing the Final Order requirements in the Study Area is the establishment of a Rural Lands Stewardship program through the creation of the Collier County Rural Lands Stewardship Area Overlay (RLSAO). The RLSAO will become a feature of Collier County's FLUM and be governed by the adoption of the proposed Plan policies.

The Rural Lands Stewardship Program is an incentive-based program that rewards owners for voluntarily agreeing to protect important natural or agricultural features. For example, the program compensates property owners for preserving environmentally sensitive land, open space and/or certain types of agricultural operations. Compensation to the property owner occurs through the awarding of "stewardship credits" which can then be used in "receiving" areas that will require the credits in order to be developed.

Stewardship Credits are created from any lands with the Overlay area that are to be kept in permanent agriculture, open space or conservation uses. These lands will be identified as Stewardship Sending Areas (SSAs). Credits are calculated using a specific methodology set forth in a Stewardship Credit Worksheet. Natural resource values of the land are measured by the Natural Resource Stewardship Index as specified on the Worksheet.

Credits can be transferred only to lands with the Overlay area that meet defined suitability criteria. These lands are defined as Stewardship Receiving Areas (SRAs). SRAs are the target areas for a compact mixed use development pattern, rather than the traditional single-family 5-acre tract development that characterizes rural residential uses. SRAs have the least environmental sensitivity. A minimum of eight (8) Credits must be expended to develop each acre of an SRA. An SRA must be at least 20 acres in size and meet various development criteria. Although there are 115,300 ± acres of potential SRAs, it has been estimated that the "8 credit requirement" will set aside approximately 16,800 acres, or 9% of the Study Area, for clustered development. It is estimated that only 6,700 acre as would be need to meet the Study Area's population projections for the year 2025.

Mapping the areas of high ecological value, using the best available data and analysis, has led to the mapping of flow ways and native habitat areas in the Study Area. Wetland flow ways are mapped as Flow way Stewardship Areas (FSAs) and Habitat Stewardship Areas (HSAs). Within the Stewardship Overlay System, FSAs and HSAs are defined as Stewardship Sending Areas (SSAs), and are precluded from being Stewardship Receiving Areas (SRAs). FSAs comprise approximately 31,000 acres; HSAs comprise of approximately 36,000 acres. Combined, FSAs and HSAs represent roughly one-third of the Study Area.

The Stewardship Overlay also has identified Water Retention Areas (WRAs) as having unique status. These areas (approximately 18,000 acres) are part of the permitted stormwater management system for agricultural operations, yet typically are considered wetlands and have an important ecological function. The proposed policies will allow WRAs to be either SSAs or be incorporated into SRAs. If they are incorporated into SRAs, then any modifications to the WRA will have to insure that there will be no net loss of habitat functions.

Of the 78,000 ± acres of wetland land cover mapped in the Overlay area, the Collier County staff estimated that approximately 51,000 ± acres are located in the FSAs and HSAs, and another 14,000 ± acres of wetland land cover are located in the WRAs. Thus approximately 65,000 acres, or 83% of the Overlay's wetland land cover is located in the FSAs, HSAs, and WRAs. Additionally, it was estimated that approximately 91% of the Panther telemetry points have been recorded FSAs, HSAs, and WRAs.

### **Minimum Regulatory Requirements**

The basic premise of the Stewardship Overlay Program is that the economic incentive for generating credits by preserving environmentally sensitive land, open space and/or certain types of agricultural operations, will discourage land owners from developing land within FSAs and HSAs; or, conversely, will encourage landowners to transfer development rights out of FSAs and HSAs. Thus, the primary focus of the strategy is an incentive-based program designed to direct incompatible land uses away from wetlands and listed species habitats in addition to preventing the premature conversion of agricultural lands.

According to the County, the proposed policies, however, do provide for some minimum regulatory standards. Key among the policies for habitat protection is the requirement that, when a property owner does not participate in the Stewardship program, site clearing and alteration within FSAs and HSAs – outside the Area of Critical State Concern (ACSC) – be limited to 30% of the property, of which no more than 50% may be non-permeable surfaces. Areas with the ACSC (approximately 63,700 acres, or 33% of the Study Area) will still be subject to the ACSC regulations, e.g. 10% clearing standard. Additionally, the design of SRAs will demonstrate that ground water table draw down will not adversely impact adjacent FSAs, HSAs, WRAs or Conservation lands. Open space and recreational uses will be used to provide a buffer within an SRA adjoining an FSA, HAS, or the existing Conservation Lands.

### **Allowable Land Uses**

Properties located outside of an FSA and HAS that are not participating in the program, will experience no change in the current residential density (1 unit per 5 acres), permitted uses, or property rights of their land. For properties located within the FSA, and not participating in the program, all uses are prohibited except for agriculture. Properties



located with a HAS, and not participating in the program, will experience no change in the current residential density (1 unit per 5 acres), permitted uses, or property rights of their land; however, site alteration (for non-agricultural uses) will be limited to 30%.

However, once a landowner has voluntarily designated property as a Stewardship Sending Area (SSA), by petitioning the Board of County Commissioners, the allowable land uses on that property become strictly defined. SSA designation is considered to be perpetual; in essence, it runs with the land and cannot be removed. Properties designated as Stewardship Receiving Areas (SRAs) are allowed higher residential density, and possibly other types of land uses as well, depending upon the number and types of credits used, as applied to the Receiving Area Characteristic Table, and depending upon the size of the receiving property. Densities within SRAs will not be less than 1 unit per 2 acres (0.5 units per 1 acre), and cannot exceed 4 units per acre. An individual SRA must be at least 20 acres in size.

An SRA is established via a petition submitted by the property owner to the Board of County Commissioners; the location, size, and density of each SRA will be determined on a case-by-case basis. This petition must include a master plan that demonstrates the SRA: complies with applicable policies of the Overlay; is designed to direct incompatible land uses away from wetlands and critical habitat areas designated as FSAs and HSAs; and, is designed to discourage urban sprawl. The SRA master plan must also identify the mixture of uses to be provided, which, in addition to residential uses, must include necessary support services and facilities. The uses allowed include: residential, office and retail commercial, schools, parks recreational facilities, churches, civic and governmental, libraries, and essential services. The form of development for the SRAs – which are to be compact and contain a mixture of uses (or be proximate to) – may include towns, villages and hamlets; these developments may include commercial centers and “smart parks.” Adequate infrastructure to serve the SRA is required concurrent with demand. The perimeter of SRA must provide for a transition to uses outside the SRA; the transition area may consist of setbacks, landscape buffers, recreation/open space uses, and other appropriate uses/techniques. Where agriculture uses exist on the adjoining lands outside of the SRA, the SRA must be designed in such a way as to allow for the continuation of the agricultural use and to minimize potential conflicts between the agricultural use and SRA uses. Where an FSA, HSA or conservation land exist on the adjoining lands outside the SRA, open space and recreational uses shall be provided as a buffered.

The County staff believes that the adoption and implementation of the Rural Lands Stewardship Area Overlay will not result in an increase to the total number of allowable dwelling units or population in the Eastern Lands area, but rather will result in a reallocation of the density and population allowed under the baseline standards (pre-Final Order conditions) from a land-consuming checkerboard pattern into compact, clustered developments. However, not unlike the Rural Fringe amendments, the potential certainly

exists from an increased amount of commercial development and other non-residential development in the allowed compact, mixed-use developments (towns, hamlets, villages).

### **Pepper Ranch**

The County staff has worked with the representative of the Pepper Ranch lands, an area containing some 2500 ± acres of which 2270 ± acres are within the Rural Stewardship Overlay Area and 235 ± acres are within the Immokalee Urban Area. The Urban lands are designated RT on the Immokalee Area Master Plan (IAMP), contain a high degree of wetlands and have significant habitat value. These lands are adjacent to Lake Trafford and to the Camp Keais Strand (an FSA). Along with the land owner representative, the County staff has developed a Density and Intensity Blending policy, which is included with the draft GMP's currently under consideration. This Density and Blending policy is only applicable to the RT designation and adjacent lands under the same ownership along the northwest side of Lake Trafford. (The landowner's representative executed an analysis that revealed that the earlier language would have a much broader application, perhaps as much as 4,500 ± acres along the periphery of the IAMP boundaries.) Based on these findings the County staff recommends that the IAMP be amended to cross-reference this FLUE policy.

### **REGIONAL SIGNIFICANCE**

Based on the information in the County's report, the *location* of the proposed amendment in the eastern lands of Collier County, the *magnitude* of the 195,000 ± acres involved in the proposed Rural Lands Stewardship Program and the *character* of the proposed development pattern changes and environmental resource impacts, Council staff finds that the proposed amendments are regionally significant.

### **CONSISTENCY WITH THE REGIONAL POLICY PLAN**

With the County's commitment to follow-through with the implementation Rural Lands Stewardship Area Program and because no additional population or housing units are being added to the Eastern Lands area of the County, the proposed amendment is consistent with and helps implement Goals and Policies of the Strategic Regional Policy Plan, August 1995, including:

#### **II Regional Economic Infrastructure**

##### **Goal II-6**

All local governments will eliminate deficiencies in public facilities and services and establish properly financed maintenance schedules.

**Policy 8** Land development plans and regulations should:

- a. be coordinated with support services;

- b. encourage or direct development to areas with adequate current or programmed facilities and services.
- d. ensure or pursue urban land development in areas that will have the capacity to service the associated new population and commerce;
- e. prioritize new development, including that sponsored by government, to areas that have underutilized infrastructure and service capacity; and
- f. ensure that the necessary public facilities and services are provided concurrently with future development.

**Goal II-7**

The public facilities and services needed for economic development in existing rural communities will continue to improve, consistent with environmental protection.

**Policy 1** State and regional agencies should prioritize discretionary technical assistance for rural areas.

**Goal II-9**

The regulatory programs in the Region should recognize the desirability of improving existing developed areas and businesses.

**Policy 7** Comprehensive plans and land development regulations should:

- a. provide for flexible land use regulations, such as mixed-use zoning, planned unit development ordinances, and performance zoning, as alternatives to traditional fixed-use zoning, and
- b. increased densities and infill developments in centralized urban areas.

**Policy 8** Planning or regulatory programs should include incentives to encourage private participation in the achievement of public benefits.

**III Economic Stability**

**Goal II-14**

The natural resources essential to the overall development of the Region will be identified and protected.

**Policy 1** Wetland areas should be maintained, enhanced, restored, or re-created to provide natural cleansing of surface water runoff, water storage, and aquifer recharge less expensively than manmade alternatives.

**Policy 18** Comprehensive plans and land development regulations should:

- a. depict on maps the appropriate distribution of urban uses necessary for the balanced growth of the forecasted population;
- b. designate existing urban lands and transportation corridors for development and redevelopment, and ensure adequate access and services are provided to such lands;

- c. ensure existing urban areas are protected from the adverse impacts of future growth;
- d. ensure future growth is directed to lands most suitable through natural capacity, accessibility, previous preparation for urban purposes, and the provision of adequate public facilities;
- e. identify environmentally sensitive areas that should be protected from agriculture, industrial, and urban development; and
- f. protect state, regional, and local public facilities, corridors, and rights-of-way.

#### **IV Natural Resources**

##### **Goal IV-2**

The diversity and extent of the Region's protected natural systems will increase consistently beyond that existing in 1990.

**Policy 2** Unique natural habitats including beaches, primary dunes, estuaries, and wetlands should be protected, conserved and restored to maintain their environmental, economic, aesthetic, and recreational values through land management programs, land acquisition programs and land development regulations.

**Policy 3** The ecological functions of wetlands systems should be protected and resorted, if needed, to ensure their long-term environmental, economic and recreational value.

##### **Goal IV-8**

Declining trends in quality and quantity of coastal resources will reverse due to the success of pollution control measures and restoration efforts.

**Policy 1** Growth management regulations for the coastal zone should be adopted and implemented which:

- a. prevent new development, in coastal or inland areas, that will degrade the quality, or hamper the productivity of marine or estuarine environments;
- a. protect dune systems, mangroves, estuaries, and salt marshes to ensure the continual functioning of the coastal ecosystem;
- e. prevent new development which degrades high marsh areas, mangroves, freshwater or saltwater wetlands, or any regionally significant natural resource; and
- i. promote the restoration of degraded coastal resources.

#### **Conclusions**

Council staff agrees with the County staff's conclusions that the proposed Stewardship Program is an innovative and incentive-based approach to protect agricultural lands and

natural resources in the Eastern Lands Area of the County. The Stewardship Credit program is designated to provide landowners incentives to direct incompatible land uses away from wetlands, listed species and their habitats. Much of the area's natural resources are found within the FSAs, HSAs and WRAs. The FSAs and HSAs combined acreage of 67,000 ± acres exceed the interim NRPA acreage of 41,000 ± acres by 26,000 ± acres. The Overlay also identifies and provides for the protection of approximately 18,000 acres of WRAs. These three areas combined 83% of the area's wetland land cover; additionally, FSAs and HSAs contain approximately 91% of the area's panther telemetry points. In addition to the incentive program, the Overlay also contains some minimum standards for protecting the area's natural resources.

Council staff also agrees with the County staff in recognizing that additional analyses are needed with regard to the public infrastructure and some other GMP Elements will be needed to coordinate the proposed FLUE Overlay at Adoption time.

Council staff would offer the same comments that were made during the County's Rural Area amendments. The proposed amendments provide for the transfer of density from the sending areas to the receiving areas. The amendment speaks to providing an urban form of towns, villages, and hamlets with the residential, commercial and other uses that will be used to provide the new urban format in the Eastern Lands area; however, the proposed amendments provide no standards as to what these urban forms will eventually look like. Often these standards are delayed to amendments of the County's Land Development Code.

Council staff would recommend that the town, village and hamlet forms be at least generally described as to the development parameters of the future urban development in this amendment. This description should be included so that future development interests know specifically what will be expected in terms of development patterns in the Eastern Lands Area in the future. In addition, the general locations suitable for the different types of development patterns should be identified on the Future Land Use Map. It is unclear whether all new development will take the town, village and hamlet form or whether some of this more compact development will occur in traditional standard type subdivisions in and adjacent to Immokalee or will occur in new gated golf course communities nearer to the coast or along SR 29.

SWFRPC staff review find that the proposed amendments to the Comprehensive Plan of Collier County are consistent with the Strategic Regional Policy Plan, August 1995.

This review is based on information provided by the Collier. It covers only the proposed amendments. This is not a recommendation of approval or disapproval or consistency or inconsistency for other cases in which these amendments might be applied. The comments and conclusions offered here do not limit or restrict the comments that could be provided and the conclusions that might be reached by SWFRPC as a part of the DRI process.