



Growth Management Department
Zoning Division
CONSISTENCY REVIEW MEMORANDUM

To: James Sabo, AICP, Principal Planner, Zoning Services Section
From: Sue Faulkner, Principal Planner, Comprehensive Planning Section
Date: December 4, 2020
Subject: *Future Land Use Element (FLUE) Consistency Review of Proposed Stewardship Receiving Area*

PETITION NUMBER: SRA PL20190001837 Review of Submittal 6

PETITION NAME: Bellmar Village SRA

NOTE: This Consistency Review is based on a number of submitted documents including: SRA document, narrative, deviations, and Master Plans that were submitted on 11-13-20.

REQUEST: This petition seeks to establish a Stewardship Receiving Area (SRA) known as Bellmar Village on a ±999.74-acre site in accordance with provisions of the Rural Lands Stewardship Area Overlay (RLSAO), as contained in the Collier County Growth Management Plan's Future Land Use Element and the Collier County Land Development Code (LDC). The SRA Development Document states the Village contains two distinct Context Zones: Neighborhood General and mixed use Village Center. The SRA Development Document Overview states that the Village includes primarily a residential community (of ±976.11 acres) and a ±23.63-acre mixed-use Village Center which will provide neighborhood-scaled retail, office, civic and community uses. The residential portion will include a maximum of 2,750 dwelling units, with no fewer than 275 multi-family dwelling units (required 10%), up to 85,000 Square Feet (sq. ft.) of retail/office uses [the minimum sq. ft. proposed is 68,750 sq. ft. within the village center]. The Economic Assessment used the following development assumptions:

- total condo, duplex, single-family attached = 1,160 units
- total single family < 4,000 sq. ft. = 1,590 units
- non-residential 50,001 – 100,000 sq. ft. = 85,000 sq. ft. of retail/office uses
- neighborhood civic = 27,500 sq. ft. of civic, government and institutional uses

The Project Narrative & Statement of Compliance states that the 35% Open Space requirement for an SRA (which is ±349.91 acres) will be met and exceeded. The Master Plan shows a total of ±507.66 acres of Open Space (including a % of road ROW, % of Amenity Centers, % of Village center, % of lakes, % of lake maintenance easement, % of neighborhood general, % of perimeter buffers, and % of utility easement) which totals approximately 157.75 acres over the requirement. The Open Space totals listed on the Master Plan include 4.64 acres of the 15.4 acres for amenity centers will be open space. The Project Narrative & Statement of Compliance states there is to be a minimum of 10 acres for Parks & Community Green Space (1%). There is a Developer Commitment for only one children's playground with a minimum of 2,500 sq. ft. The location of this playground is to be identified at the time of subdivision platting or SDP.

LOCATION: The ±999.74-acre property is located approximately 4 miles south of Oil Well Road, and approximately 1/3 mile east of DeSoto Blvd. (lying between 4th Ave. NE and 6th Ave. SE); and lies within Sections 2, 3, 10, and 11, Township 49 South, Range 28 East.

COMPREHENSIVE PLANNING COMMENTS:

The subject property is designated Agricultural/Rural (Agricultural/Rural Mixed Use District) and is within the Rural Lands Stewardship Area Overlay (RLSAO), as depicted on the Future Land Use Map (FLUM) and in the Future Land Use Element (FLUE) of the Growth Management Plan (GMP). The proposed Stewardship Receiving Area (SRA) site is zoned A-MHO-RLSAO, Rural Agricultural within the Mobile Home Overlay and Rural Lands Stewardship Area Overlay. Lands to the north are zoned A-MHO-RLSAO and contain Water Retention Area (WRA) and Open, and the SSA 17 and the SSA 15 to the north; lands to the east are zoned A-MHO-RLSAO and contain Habitat Stewardship Area (HAS), WRA, and Open, and SSA 6; lands to the south is zoned A-MHO-RLSAO and contain WRA and HSA and Flowway Stewardship Area (FSA) on the RLSAO's Stewardship Overlay Map in the FLUE; lands to the west are zoned A-MHO-RLSAO and contain Open and abut the proposed future Big Cypress Parkway right-of-way and a channel relocation; and, further to the west, lands are zoned Estates and designated Estates on the Rural Golden Gate Estates Sub-Element of the Golden Gate Area Master Plan.

Owners of property within the RLSAO may develop their property under the baseline conditions - agriculture and related uses, essential services, residential at a maximum density of 1 dwelling unit per 5 acres, parks and open space, earth mining, etc. – or choose to participate in the Stewardship Program. The Stewardship Program provides for the protection of valuable habitats by designation as a Stewardship Sending Area (SSA) where land use layers are removed, which generates Stewardship Credits that can be used to entitle mixed use developments known as Stewardship Receiving Areas (SRAs) on lands appropriate for development. SRAs may vary in size and must contain a mixture of uses, as provided for in the RLSAO policies contained in the FLUE and the RLSA zoning Overlay in the LDC. Details of the RLSAO are provided in the RLSAO Policies and RLSAO Attachment C, Stewardship Receiving Area Characteristics, in the FLUE as well as the implementing RLSAO zoning overlay in the LDC - also referred to as the LDC Stewardship District.

RURAL LANDS STEWARDSHIP AREA POLICIES AND PROVISIONS AND GENERAL OBSERVATIONS:

The GMP together with the LDC are used in determining the consistency of the request. To determine consistency with the more-general Policies and provisions of the FLUE's RLSAO, the specific policies and provisions of the RLSA zoning overlay found in the LDC are taken into consideration.

Within the RLSAO, the conversion of rural and agricultural lands to urban villages, new towns and satellite communities is based on area-based allocations, clustering and open space provisions, mixed-use development, and other planning strategies and techniques, while protecting environmentally sensitive areas, maintaining the economic viability of agricultural and other predominantly rural land uses, and providing for the cost-efficient delivery of public facilities and services.

Specifically, the RLSAO allows development in the form of towns, villages, hamlets, and compact rural developments (CRD), subject to certain criteria and development parameters, as a Stewardship Receiving Area, and allows "public benefit uses" such as public schools and public or private post-secondary institutions, including ancillary uses; community parks exceeding the minimum acreages required, municipal golf courses; regional parks; and governmental facilities.

This application proposes the Bellmar Village SRA development using the Rural Land Stewardship Credit System, as provided for under RLSAO Policy 1.4 in the FLUE. The SRA application further proposes that Stewardship Credits, enabling this SRA to be developed as a Village, will be obtained from permanent restrictions on the use of environmentally sensitive land (from approved SSAs). The SRA procedures and standards are outlined in Section 4.08.07 of the LDC. Specifically, the SSAs to be used to enable the project to proceed as an SRA are subject to County review and approval at the SRA submittal stage. The SSA documents submitted for review include the *Stewardship Receiving Area (SRA) Credit Use and Reconciliation Application* (draft uploaded 11/14/2019) for SSA no.18 and are under review from the Office of the Collier

County Attorney to determine whether they have been reconciled, updated and may be found internally consistent with other proposed SRA materials.

All SSAs must be approved and Stewardship Credits submitted before or concurrent with this SRA.

This SRA must meet the Collier County RSLA Overlay Stewardship Receiving Area Characteristics as identified for Villages in the table below. The table lists characteristic land uses and threshold requirements from the RLSA Overlay, [FLUE] Attachment C, followed by *staff comments/analysis [in bold italics]*. Underlined uses in the table are not required uses.

Typical Characteristics	Village
Size (Gross Acres)	100 – 1,000 acres; <i>[The SRA is ±999.74 acres total.]</i>
Residential Units (DUs) per gross acre base density	1 – 4 DUs per gross acre; <i>[2,750 DU/ ±999.74 acres = ±2.75 DU/A proposed in the SRA. The acreage that are receiving credits is 841.99ac and that density calculates to 3.266 DU/A]</i>
Residential Housing Styles	Diversity of single-family and multi-family housing types, styles, lot sizes; <i>[According to the SRA Development Document, the SRA includes a maximum of 2,750 DUs, with no fewer than 275 multi-family dwelling units (10% of DUs). According to the Neighborhood General Development and Design Standards, the other 2475 SF DUs can vary in DU types allowed, e.g. zero lot line, SF detached and attached, villas, townhomes, etc. Lot sizes vary also.] Staff hopes to see a mix of housing types more reflective of the housing types mentioned in the Economic Assessment including condo, duplex, single-family attached and single family detached. The Economic Assessment's Development Assumptions proposed a mix between single family and multi-family housing with 58% single family and 42% multi-family, which is similar to the countywide ratio and very different from the proposed SRA ratio.]</i>
Maximum Floor Area Ratio or Intensity	Retail and Office – 0.5; <i>[The Village Center Development and Design Standards Table states a minimum of 800 sq. ft. for commercial units.]</i> Civic/Governmental/Institution – 0.6; <i>[These uses are provided for in the mixed-use Village Center.]</i> <u>Group Housing</u> – 0.45; <i>[not required – ALFs (Adult Living Facility) and CCRCs (Continuing Care Retirement Community) proposed (with residential equivalency ratio).]</i> <u>Transient Lodging</u> – 26 units/ac. net; <i>[not required – not proposed.]</i>
Goods and Services	Village Center with Neighborhood Goods and Services in Village Centers – Minimum 25 sq. ft. gross building area per DU; <i>[2,750 DUs x 25 sq. ft./DU = 68,750 sq. ft. required. The SRA allows 68,750 to 85,000 sq. ft. of all commercial uses. No provisions are in place to ensure the minimum neighborhood scale goods and services in village center are provided however.]</i>
Water and Wastewater	Centralized or decentralized community treatment system; <i>[Served by centralized County facilities.]</i> <u>Interim Well and Septic</u> ; <i>[not required – not proposed.]</i>
Recreation and Open Spaces	Parks and Public Green Spaces within Neighborhoods (minimum 1% of gross acres); <i>[10.0 acres are required (999.74 acres x 1%), and 11.32 acres are to be provided as stated on page 3 of the Project Narrative and Statement of Compliance. However, in the Development Commitments of the SRA Document there is no</i>

	<i>commitment to provide the 11.32 acres for parks only a commitment to provide a 2,500 sq. ft. children's playground. Locations are shown on the Master Plan, Exhibit A. Approximately 26.79 ac of active and passive parks and community green space is provided.]</i> <u>Active Recreation/Golf Courses; [not required – not provided.]</u> <u>Lakes; [provided, covering more than ±283 acres.]</u> <u>Open Space – minimum 35% of SRA; [±350 acres of Recreation and Open Spaces required, ±511 acres provided.]</u>
Civic, Governmental and Institutional Services	Moderate Range of Services – minimum 10 sq. ft./DU; <i>[27,500 sq. ft. required (2,750 DUs x 10 sq. ft./DU); 27,500 sq. ft. proposed. No provisions are in place to ensure the minimum services are provided however.]</i> <u>Full Range of Schools; [not required – not proposed. School sites not set aside, improved, and/or dedicated for public use in the Village.]</u>
Transportation	Auto-interconnected system of collector and local roads; required connection to collector or arterial; <i>[a central roadway will loop through the entire residential village acting as the main connecting thoroughfare; loop will connect in two places to the future north-south thoroughfare of Big Cypress Parkway. A mostly-grid system of local streets is provided.]</i> Interconnected sidewalk and pathway system; <i>[will be provided.]</i> <u>Equestrian Trails; [not required – not proposed.]</u> <u>County Transit Access; [not required – not proposed.]</u>

The relevant RLSAO Policies (Group 4 Policies) are listed below, followed by *staff comments/analysis [in italics]*.

Group 4 – Policies to enable conversion of rural lands to other uses in appropriate locations, while discouraging urban sprawl, and encouraging development that utilizes creative land use planning techniques by the establishment of Stewardship Receiving Areas.

Policy 4.1:

Collier County will encourage and facilitate uses that enable economic prosperity and diversification of the economic base of the RLSA. Collier County will also encourage development that utilizes creative land use planning techniques and facilitates a compact form of development to accommodate population growth by the establishment of Stewardship Receiving Areas (SRAs). Incentives to encourage and support the diversification and vitality of the rural economy such as flexible development regulations, expedited permitting review, and targeted capital improvements shall be incorporated into the LDC Stewardship District.

[The subject petition is for the establishment of a Stewardship Receiving Area (SRA).]

Policy 4.2:

All privately owned lands within the RLSA which meet the criteria set forth herein are eligible for designation as a SRA, except land delineated as a FSA, HSA, WRA or land that has been designated as a Stewardship Sending Area. Land proposed for SRA designation shall meet the suitability criteria and other standards described in Group 4 Policies. Due to the long-term vision of the RLSA Overlay... and in accordance with the guidelines [previously] established in Chapter 163.3177(11) F.S. [now: 163.3248] the specific location, size and composition of each SRA cannot and need not be predetermined in the GMP. In the RLSA Overlay, lands that are eligible to be designated as SRAs generally have similar physical attributes as they consist predominately of agriculture lands which have been cleared or otherwise altered for this purpose. Lands shown

on the Overlay Map as eligible for SRA designation include approximately 74,500 acres outside of the ACSC (and 18,300 acres within the ACSC). Approximately 2% of these lands achieve an Index score greater than 1.2. Because the Overlay requires SRAs to be compact, mixed-use and self-sufficient in the provision of services, facilities and infrastructure, traditional locational standards normally applied to determine development suitability are not relevant or applicable to SRAs. Therefore, the process for designating a SRA follows the principles of the Rural Lands Stewardship Act as further described herein.

[Land proposed for the SRA designation meets the suitability criteria and many of the other standards described in RLSA Overlay Group 4 Policies. The subject site is designated on the RLSA Overlay Map as eligible for SRA designation ("Open"). The site is not within the ACSC.]

Policy 4.3:

Land becomes designated as a SRA upon petition by a property owner to Collier County seeking such designation and the adoption of a resolution by the BCC granting the designation. The petition shall include a SRA master plan as described in Policy 4.5. The basis for approval shall be a finding of consistency with the policies of the Overlay, including required suitability criteria set forth herein, and assurance that the applicant has acquired or will acquire sufficient Stewardship Credits to implement the SRA uses. The County has adopted LDC amendments to establish the procedures and submittal requirements for designation as a SRA, providing for consideration of impacts, including environmental and public infrastructure impacts, and for public notice of and the opportunity for public participation in any consideration by the BCC of such a designation.

[The petitioner has submitted the required SRA application along with an SRA Master Plan as described in Policy 4.5.]

Policy 4.4 is not directed toward individual applications.

Policy 4.5:

To address the specifics of each SRA, a master plan of each SRA will be prepared and submitted to Collier County as a part of the petition for designation as a SRA. The master plan will demonstrate that the SRA complies with all applicable policies of the Overlay and the LDC Stewardship District and is designed so that incompatible land uses are directed away from wetlands and critical habitat identified as FSAs and HSAs on the Overlay Map.

[The applicant has submitted a master plan with their petition intended to demonstrate the SRA complies with the applicable policies of the Overlay and the LDC Stewardship District. Matters of compliance and noncompliance with applicable policies of the Overlay are addressed throughout this memo. Compliance with applicable policies of the LDC is reviewed and determined by the Zoning Services Section, Comprehensive Planning Section, and other sections and divisions of the Growth Management Department. Matters of noncompliance with the LDC Stewardship District may also be matters of noncompliance with this Overlay.]

Policy 4.6 is not directed toward individual applications.

Policy 4.7:

There are four specific forms of SRA permitted within the Overlay. These are Towns, Villages, Hamlets, and Compact Rural Development (CRD). The Characteristics of Towns, Villages, Hamlets, and CRD are set forth in [FLUE] Attachment C and are generally described in Policies 4.7.1, 4.7.2, 4.7.3 and 4.7.4. Collier County shall establish more specific regulations, guidelines and standards within the LDC Stewardship District to guide the design and development of SRAs to include innovative planning and development strategies as set forth [previously] in Chapter 163.3177 (11), F.S. [now: 163.3248] and 9J-5.006(5)(l). The size and base density of each form shall be consistent with the standards set forth on [FLUE] Attachment C. The maximum base residential density as set forth in [FLUE] Attachment C may only be exceeded through the density blending process as set forth in density and intensity blending provision of the Immokalee Area Master Plan or through the affordable housing density bonus as referenced in the Density Rating System of the Future Land Use Element. The base residential density is calculated by dividing the total number of residential units in a SRA

by the overall area therein. The base residential density does not restrict net residential density of parcels within a SRA. The location, size and density of each SRA will be determined on an individual basis during the SRA designation review and approval process.

[The SRA size, density, and uses are consistent with those set forth on [FLUE] Attachment C, Stewardship Receiving Area Characteristics, for a Village.]

Policy 4.7.1 does not apply to this application.

Policy 4.7.2:

Villages are primarily residential communities with a diversity of housing types and mix of uses appropriate to the scale and character of the particular village. Villages shall be not less than 100 acres or more than 1,000 acres. Villages are comprised of residential neighborhoods and shall include a mixed-use village center to serve as the focal point for the community's support services and facilities. Villages shall be designed to encourage pedestrian and bicycle circulation by including an interconnected sidewalk and pathway system serving all residential neighborhoods. Villages shall have parks or public green spaces within neighborhoods. Villages shall include neighborhood scaled retail and office uses, in a ratio as provided in Policy 4.15. Villages are an appropriate location for a full range of schools. To the extent possible, schools and parks shall be located adjacent to each other to allow for the sharing of recreational facilities. Design criteria for Villages shall be included in the LDC Stewardship District.

[This SRA is primarily a residential development and allows multiple DU types. A mix of uses are allowed – residential, recreational, civic/institutional, and commercial. The site comprises ±999.74 acres. Open space is provided throughout the SRA. The Village Center allows a mix of uses – multi-family dwelling units; a variety of commercial uses (minimum of 68,750 sq. ft. required); and, civic, institutional and governmental uses (minimum of 27,5000 sq. ft. required).]

Policy 4.7.2 refers to directions in Policy 4.15.1 provides, where one would expect smaller Villages (nearer 100 acres) to represent the lower end of the scale for diversity of housing types styles, [and] lot sizes, and mix of uses; while larger Villages (nearer 1,000 acres) would be expected to provide the greatest diversity of housing types styles, [and] lot sizes, and fullest range of uses – much in the same way the store with more floor area would provide a bigger variety of merchandise. Although the Economic Assessment, Development Assumption, Table 1, indicates a mix of housing of 1,590 single family with 1,160 DUs of Condo, Duplex, and Single Family attached creating a single family to multifamily ratio of 58%/42%. However, the proposed ratio committed to in the SRA Document is 90%/10% as compared to the countywide ratio of 50%/45% (remaining DUs are mobile homes, etc.) – thus there is a disconnect between the DU mix assumed vs. that which is required/committed to; staff would prefer to see a more meaningful mix, more like the ratio shown in the Economic Assessment assumptions.]

Policies 4.7.3 and 4.7.4 do not apply to this application.

Policy 4.8:

An SRA may be contiguous to a FSA or HSA, but shall not encroach into such areas, and shall buffer such areas as described in Policy 4.13. A SRA may be contiguous to and served by a WRA without requiring the WRA to be designated as a SRA in accordance with Policy 3.12 and 3.13.

[The SRA is contiguous to lands designated HSA and WRA. The project abuts WRA land uses (lakes and road rights-of-way) that are “Preserve/Reservoir WRA (not within SRA)” according to Exhibit A Master Plan or calculated as project open space. The Master Plan does note HSA setbacks. FSA designated land is not contiguous to the SRA.]

Policy 4.9:

A SRA must contain sufficient suitable land to accommodate the planned development in an environmentally acceptable manner. The primary means of directing development away from wetlands and critical habitat is the prohibition of locating SRAs in FSAs, HSAs, and WRAs. To further direct development away from

wetlands and critical habitat, residential, commercial, manufacturing/light industrial, group housing, and transient housing, institutional, civic and community service uses within an SRA shall not be sited on lands that receive a Natural Resource Index value of greater than 1.2. In addition, conditional use essential services and governmental essential services, with the exception of those necessary to serve permitted uses and for public safety, shall not be sited on lands that receive a Natural Resource Index value of greater than 1.2. The Index value of greater than 1.2 represents those areas that have a high natural resource value as measured pursuant to Policy 1.8. Less than 2% of potential SRA land achieves an Index score of greater than 1.2.

[The SRA does not include any lands designated FSA, HSA or WRA, and there are no lands in SRA with an NRI score of >1.2.]

Policy 4.10:

Within the RLSA Overlay, open space, which by definition shall include public and private conservation lands, underdeveloped areas of designated SSAs, agriculture, water retention and management areas and recreation uses, will continue to be the dominant land use. Therefore, open space adequate to serve the forecasted population and uses within the SRA is provided. To ensure that SRA residents have such [open space] areas proximate to their homes, open space shall also comprise a minimum of thirty-five percent of the gross acreage of an individual SRA Town, Village, or those CRDs exceeding 100 acres. Lands within a SRA greater than one acre with Index values of greater than 1.2 shall be retained as open space. As an incentive to encourage open space, such uses within a SRA, located outside of the ACSC, exceeding the required thirty-five percent shall not be required to consume Stewardship Credits.

[Open space exceeds the minimum of thirty-five percent of the gross acreage by over 157.75 acres. Approximately 349 acres are required (± 999.74 acres \times 35%), and additional acres are provided. All 999.74 acres have an NRI Value of less than 1.2 in the Bellmar SRA Natural Resource Index Values.]

Policy 4.11:

The perimeter of each SRA shall be designed to provide a transition from higher density and intensity uses within the SRA to lower density and intensity uses on adjoining property. The edges of SRAs shall be well defined and designed to be compatible with the character of adjoining property. Techniques such as, but not limited to setbacks, landscape buffers, and recreation/open space placement may be used for this purpose. Where existing agricultural activity adjoins a SRA, the design of the SRA must take this activity into account to allow for the continuation of the agricultural activity and to minimize any conflict between agriculture and SRA uses.

[All perimeter lands not abutting the future Big Cypress Parkway are planned to contain road rights-of-way, lakes or perimeter buffers. Comprehensive Planning staff defers the determination of compatibility with surrounding land uses to Zoning Services Section reviewers based on the totality of the project.]

Policy 4.12:

Where an SRA adjoins a FSA, HSA, WRA or existing public or private conservation land delineated on the Overlay Map, best management and planning practices shall be applied to minimize adverse impacts to such lands. SRA design shall demonstrate that ground water table draw down or diversion will not adversely impact the adjacent FSA, HSA, WRA or conservation land. Detention and control elevations shall be established to protect such natural areas and be consistent with surrounding land and project control elevations and water tables.

[The SRA is contiguous to lands designated HSA and WRA. The SRA is not contiguous to existing public or private conservation lands delineated on the Overlay Map. The project abuts WRA land uses (lakes and road rights-of-way) that are "Preserve/Reservoir WRA (not within SRA)" according to Exhibit A Master Plan or calculated as project open space. The Master Plan does note HSA setbacks. FSA designated land is not contiguous to the SRA. Staff defers review and comment pertaining to these aspects of the SRA to specialists of the Environmental Planning Section of the County's Development Review Division regarding impacts upon groundwater, and the water detention and control elevations.]

Policy 4.13:

Open space within or contiguous to an SRA shall be used to provide a buffer between the SRA and any adjoining FSA, HSA, or existing public or private conservation land delineated on the Overlay Map. Open space contiguous to or within 300 feet of the boundary of a FSA, HSA, or existing public or private conservation land may include: natural preserves, lakes, golf courses provided no fairways or other turf areas are allowed within the first 200 feet, passive recreational areas and parks, required yard and set-back areas, and other natural or man-made open space. Along the west boundary of the FSAs and HSAs that comprise Camp Keais Strand, i.e., the area south of Immokalee Road, this open space buffer shall be 500 feet wide and shall preclude golf course fairways and other turf areas within the first 300 feet.

[The SRA is contiguous to lands designated HSA. The Master Plan notes 300 feet HSA setbacks. FSA designated land is not contiguous to the SRA but is contiguous to abutting HSA designated land. The SRA is not contiguous to existing public or private conservation lands delineated on the Overlay Map.]

Policy 4.14:

The SRA must have either direct access to a County collector or arterial road or indirect access via a road provided by the developer that has adequate capacity to accommodate the proposed development in accordance with accepted transportation planning standards. No SRA shall be approved unless the capacity of County collector or arterial road(s) serving the SRA is demonstrated to be adequate in accordance with the Collier County Concurrency Management System in effect at the time of SRA designation. A transportation impact assessment meeting the requirements of Section 2.7.3 of the LDC, or its successor regulation shall be prepared for each proposed SRA to provide the necessary data and analysis.

[Access is via the future Big Cypress Parkway, a future collector roadway. Capacity analysis is deferred to Transportation Planning Section staff. Concurrency is determined at the time of subsequent development orders. This SRA project is just one of several similar proposals, with its application materials templated upon, other SRA or SRA applications. Comprehensive Planning staff also asks that Transportation Planning Section give consideration to the cumulative effects or demands of these SRAs, rather than considering each one individually.]

Policy 4.15.1:

SRAs are intended to be mixed use and shall be allowed the full range of uses permitted by the Urban Designation of the FLUE, as modified by Policies 4.7, 4.7.1, 4.7.2, 4.7.3, 4.7.4 and [FLUE] Attachment C. An appropriate mix of retail, office, recreational, civic, governmental, and institutional uses will be available to serve the daily needs and community wide needs of residents of the RLSA. Depending on the size, scale, and character of a SRA, such uses may be provided either within the specific SRA, within other SRAs in the RLSA or within the Immokalee Urban Area. By example, each Village or CRD shall provide for neighborhood retail/office uses to serve its population as well as appropriate civic and institutional uses, however, the combined population of several Villages and Hamlets may be required to support community scaled retail or office uses in a nearby CRD. Standards for the minimum amount of non-residential uses in each category are set forth in [FLUE] Attachment C and shall be also included in the Stewardship LDC District.

[This SRA includes mixed uses – residential, civic/institutional, recreational, and commercial uses similar to those in the LDC's C-3, Commercial Intermediate, zoning district.]

Policy 4.15.2:

The Board of County Commissioners (BCC) may, as a condition of approval and adoption of an SRA development, require that suitable areas for parks, schools and other public facilities be set aside, improved, and/or dedicated for public use. When the BCC requires such a set aside for one or more public facilities, the set aside shall be subject to the same provisions of the LDC as are applicable to public facility dedications required as a condition for PUD rezoning.

[No acreage exceeding the minimum acreage is proposed for "public benefit use." In the Developer Commitments a single 2,500 sq. ft. children's playground is to be provided. Open space is provided in excess

of that required by 161 acres. Collier County Public Schools is working on a Developer Contribution Agreement, according to the Economic Assessment.]

Policy 4.15.3:

Applicants for SRA designation shall coordinate with Collier County School Board staff to allow planning to occur to accommodate any impacts to the public schools as a result of the SRA. As part of the SRA application, the following information shall be provided:

1. Number of residential units by type;
2. An estimate of the number of school-aged children for each type of school impacted (elementary, middle, high school); and,
3. The potential for locating a public educational facility or facilities within the SRA, and the size of any sites that may be dedicated, or otherwise made available for a public educational facility.

[Project development is planned in a single phase. School sites are not set aside, improved, and/or dedicated for public use in the development.]

The Public Facilities Report projects 670 new students to be generated from the 2,750 residences [4,175 permanent / 5,683 seasonal residents]. This overall student figure is allocated to the number of school-aged children for each type of school impacted (elementary - 305, middle - 148, high school - 217.) Staff defers review and comment on the adequacy and accuracy of data submitted with this application to School District personnel – which did not identify a need for a school site in this SRA.]

Policy 4.16:

A SRA shall have adequate infrastructure available to serve the proposed development, or such infrastructure must be provided concurrently with the demand. The level of infrastructure provided will depend on the form of SRA development, accepted civil engineering practices, and LDC requirements. The capacity of infrastructure necessary to serve the SRA at build-out must be demonstrated during the SRA designation process. Infrastructure to be analyzed includes transportation, potable water, wastewater, irrigation water, stormwater management, and solid waste. Transportation infrastructure is discussed in Policy 4.14. Centralized or decentralized community water and wastewater utilities are required in Towns, Villages, and those CRDs exceeding one hundred (100) acres in size and may be required in CRDs that are one hundred (100) acres or less in size, depending upon the permitted uses approved within the CRD. Centralized or decentralized community water and wastewater utilities shall be constructed, owned, operated and maintained by a private utility service, the developer, a Community Development District, the Immokalee Water Sewer Service District, Collier County, or other governmental entity. Innovative alternative water and wastewater treatment systems such as decentralized community treatment systems shall not be prohibited by this Policy provided that they meet all applicable regulatory criteria. Individual potable water supply wells and septic systems, limited to a maximum of 100 acres of any Town, Village or CRD of 100 acres are permitted on an interim basis until services from a centralized/decentralized community system are available. Individual potable water supply wells and septic systems are permitted in Hamlets and may be permitted in CRDs of 100 acres or less in size.

[According to the Public Services Report, the demand for potable water will be approximately 1.14 million gallons per day (average) and 1.66 million gallons per day (on a maximum monthly basis). Sanitary sewers must be designed to accommodate approximately 0.727 million gallons per day (average) and 1.091 million gallons per day (3-day maximum).]

Adequate infrastructure to develop the project is planned with centralized water supply facilities and wastewater collection and treatment services provided by Collier County.

The application included a discussion of potential for reclaimed water for irrigation in the Public Services Report.]

Policy 4.17:

The BCC will review and approve SRA designation applications in accordance with the provisions of Policy 1.1.2 [now Policy 1.2] of the Capital Improvement Element (CIE) of the GMP for Category A public facilities. Final local development orders will be approved within an SRA designated by the BCC in accordance with the Concurrency Management System of the GMP and LDC in effect at the time of local development order approval.

[This project does not create a significant impact on countywide population as defined in Policy 1.1.2 of the CIE. Staff defers to the departments and agencies involved directly with Concurrency Management – for which review occurs at time of subsequent development order. The necessary information to evaluate the impacts on Category A is provided with the Public Facilities Report. This SRA project is just one of several similar proposals, with its application materials templated upon, other SRA or SRA applications. Comprehensive Planning staff also ask that the departments and agencies involved directly with Concurrency Management give consideration to the cumulative effects or demands of these SRAs, rather than considering each only individually.]

Policy 4.18:

The SRA will be planned and designed to be fiscally neutral or positive to Collier County at the horizon year based on a public facilities impact assessment, as identified in LDC 4.08.07.K. The BCC may grant exceptions to this Policy to accommodate affordable housing, as it deems appropriate. Techniques that may promote fiscal neutrality such as Community Development Districts, and other special districts, shall be encouraged. At a minimum, the assessment shall consider the following public facilities and services: transportation, potable water, wastewater, irrigation water, stormwater management, solid waste, parks, law enforcement, and schools. Development phasing, developer contributions and mitigation, and other public/private partnerships shall address any potential adverse impacts to adopted levels of service standards.

[The applicant asserts the development will be fiscally neutral to Collier County in the analysis provided in the Economic Assessment Report. Staff defers to the other County staff involved in the review of the Economic Assessment Report. However, staff notes there appears to be a disconnect between the DU mix assumptions in the EA Report vs. that which is required/committed to in the SRA document.]

Policy 4.19:

Eight (8) credits shall be required for each acre of land included in a SRA, except for open space in excess of the required thirty-five percent as described in Policy 4.10 or for land that is designated for a public benefit use described in Policy 4.19. In order to promote compact, mixed use development and provide the necessary support facilities and services to residents of rural areas, the SRA designation entitles a full range of uses, accessory uses and associated uses that provide a mix of services to and are supportive to the residential population of a SRA, as provided for in [FLUE] Policies 4.7, 4.15 and [FLUE] Attachment C. Such uses shall be identified, located and quantified in the SRA master plan.

[The proposed SRA comprises ±999.74 acres; of those, ±841.99 acres require ±6,735.92 credits – 157.75 acres are for open space and do not require credits, and this 1:8 ratio is met. (see Policy 4.3 comments).]

Policy 4.20:

The acreage of a public benefit use shall not count toward the maximum acreage limits described in Policy 4.7. For the purpose of this Policy, public benefit uses include: public schools (preK-12) and public or private post-secondary institutions, including ancillary uses; community parks exceeding the minimum acreage requirements of [FLUE] Attachment C, municipal golf courses; regional parks; and governmental facilities excluding essential services as defined in the LDC. The location of public schools shall be coordinated with the Collier County School Board, based on the interlocal agreement, 163.3177 F.S. and in a manner consistent with 235.193 F.S. Schools and related ancillary uses shall be encouraged to locate in or proximate to Towns, Villages, and Hamlets subject to applicable zoning and permitting requirements.

[The Master Plan does not show any acreage set aside for public benefit. However, in the SRA's Developer Commitments it lists the 2500 sq. ft. for a playground, which is for public benefit.]

Policy 4.21 does not apply, as this site is not within the ACSC, Area of Critical State Concern.

Review of select FLUE Policies (followed by staff analysis in *[italics]*):

Policy 5.6:

New developments shall be compatible with, and complementary to, the surrounding land uses as set forth in the Land Development Code (Ordinance 04-41. Adopted June 22, 2004 and effective October 18, 2004, as amended). *[Comprehensive Planning leaves this determination to the Zoning Services staff as part of their review of the petition in its entirety, giving special consideration to the specific policies and provisions of the Rural Lands Stewardship Area Overlay District in the LDC.]*

The compatibility analysis is encouraged to be comprehensive and include reviews of both the subject property and surrounding or nearby properties regarding allowed use intensities and densities, development standards (building heights, setbacks, landscape buffers, etc.), building mass, building location and orientation, architectural features, amount and type of open space and location, traffic generation/attraction, etc. Like the subject property, surrounding or nearby properties are under review for SRAs or eligible for future SRAs; these may be viewed as an interrelated set of projects, each of which affects the others.]

The County recognizes *Smart Growth* policies and practices in its consideration of future land use arrangements and choice-making options. FLUE Objective 7 and Policies 7.1 through 7.4 promote Smart Growth policies for new development and redevelopment projects pertaining to access, interconnections, open space, and walkable communities.

Objective 7:

Promote smart growth policies, reduce greenhouse gas emissions, and adhere to the existing development character of the Collier County, where applicable, and as follows:

Policy 7.1:

The County shall encourage developers and property owners to connect their properties to fronting collector and arterial roads, except where no such connection can be made without violating intersection spacing requirements of the Land Development Code. *[This property will front on the future N–S Big Cypress Parkway, classified as a future collector road in the Transportation Element. The SRA is designed to have two access points where the village east-west loop road intersects with the future Big Cypress Parkway along the western edge of the project.]*

Policy 7.2:

The County shall encourage internal accesses or loop roads in an effort to help reduce vehicle congestion on nearby collector and arterial roads and minimize the need for traffic signals. *[The Master Plan indicates a three-sided loop road that runs through the residential area and the village center tract. The project is proposed as a Village. The loop road acts as a connector road through the entire village. There is currently no connection between the proposed village and existing county roads.]*

Policy 7.3:

All new and existing developments shall be encouraged to connect their local streets and/or interconnection points with adjoining neighborhoods or other developments regardless of land use type. The interconnection of local streets between developments is also addressed in Policy 9.3 of the Transportation Element. *[This property fronts the future N–S Big Cypress Parkway, classified as a future collector road in the Transportation Element, along the western edge of Bellmar. The proposed SRA is located south of the proposed Longwater Village. No interconnection is proposed between the two projects. Staff recommends interconnection be provided to the proposed Longwater Village to the northeast via the Open area to the N-NW and abutting the NE corner of this Bellmar Village SRA.]*

Policy 7.4:

The County shall encourage new developments to provide walkable communities with a blend of densities, common open spaces, civic facilities and a range of housing prices and types. *[This SRA provides for different dwelling unit types and sizes, open space, and civic/institutional/government facilities. A deviation is being requested to allow a 10' sidewalk or multi-use pathway on one-side of the street only wherever there are houses on one side of the street only; as with other previous petitions, staff has no objection.]*

CONCLUSIONS:

1. The size and base density indicated in the Bellmar Village *SRA Development Document* (dated 8/31/2020) are consistent with those set forth on [FLUE] Attachment C of the FLUE (requirements of the RLSAO).
2. In the SRA document VIII Developer/Owner Commitments, Section 8.3 Transportation C., the applicant states “No more than 1,925 dwelling units will be issued certificates of occupancy until a minimum of 30,000 sq. ft. of the neighborhood retail and office uses have been developed and issued certificate (s) of occupancy.”

cc: Anita Jenkins, Director, Zoning Division
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