



Protecting Southwest Florida's unique natural environment and quality of life ... now and forever.

August 13, 2020

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Collier County Growth Management Department
2800 North Horseshoe Drive
Naples, FL 34104

RE: Longwater Village SRA #PL20190001836 & SSA17 #PL20160000295

Dear Ms. Gundlach, Mr. Schmidt, Mr. McLean, Ms. Wilkie, Ms. Cook, Mr. Sabo, Mr. Sawyer, and Mr. Giblin:

On behalf of the Conservancy of Southwest Florida (Conservancy) and over 7,000 supporting families, we are writing this letter to express our strong objection to the proposed Longwater Village Stewardship Receiving Area (SRA) for the following reasons, addressed in this order:

- I. Collier Enterprises' villages must be held to town standards.**
- II. Longwater Village would destroy panther habitat, not only within the SRA, but also within the "preserves".**
- III. The project is a typical suburban-style development, not innovative planning.**

Based on your reviews of the application, there appears to be some alignment between the concerns we are raising in our letter and those raised by County staff, in your review of the project. In addition to those concerns, there are other concerns that we would like to draw your attention to, not yet addressed in your review. We very much appreciate your consideration of the issues raised in our letter. It is our hope that you will recommend denial of the project based on these concerns.

I. Collier Enterprises' villages must be held to town standards.

A. The applicant's three villages equate to a town:



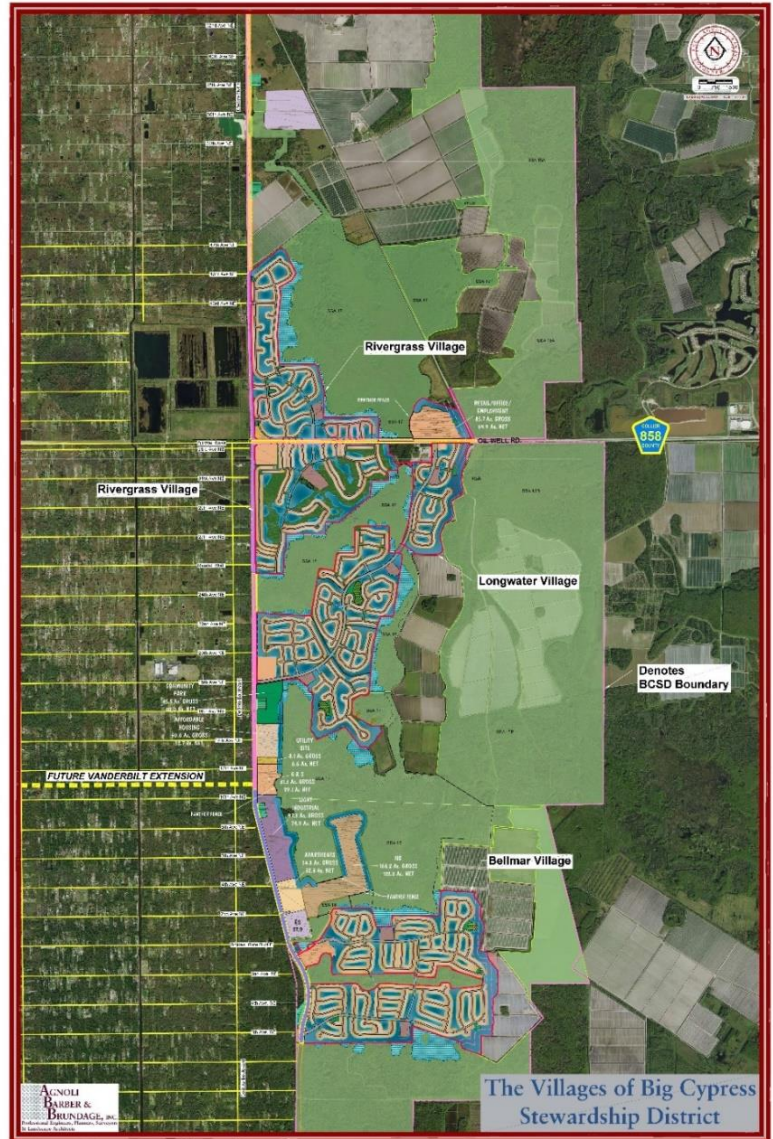
Conservancy of Southwest Florida has been awarded Charity Navigator's prestigious 4-Star top rating for good governance, sound fiscal management and commitment to accountability and transparency. Charity Navigator is America's largest and most respected independent evaluator of charities.

All three of the applicant’s contiguous villages (Rivergrass, Longwater, and Bellmar) have essentially the same build-out date¹ and, when aggregated, the three villages fall within the acreage parameters of a town. Policy 4.7.1 states, “*Towns shall not be less than 1,000 acres or more than 4,000 acres and are comprised of several villages and/or neighborhoods that have individual identity and character.*” Rivergrass, Longwater, and Bellmar equate to three thousand acres and have an estimated build-out population of 13,482 permanent residents and 7,850 homes,² which would be considered a larger town under the RLSA program. It is undeniable; the total population, traffic impacts, infrastructure, goods and service needs of the three villages are **town-sized** and must be treated as such.

The applicant seems to acknowledge that they are planning for a town, as they provided the County with an unofficial master plan of the three villages on one unified plan, which they call “The Villages of Big Cypress Stewardship District” (Figure 1). Their unofficial new town master plan includes essentially the same designs as provided in the three village SRA applications. This consolidated plan was never formally submitted as an SRA town application, nor has it been revealed in a public hearing.

Policy 4.2 affirms that “SRAs [are] to be compact, mixed-use and self-sufficient in the provision of services, facilities, and infrastructure,” which is important so that Collier County’s existing urban communities are not overwhelmed by increased traffic congestion and demands from RLSA residents who are compelled to travel west to find work and to obtain daily essential goods and services. **Table 1** provides a few examples of how the applicant is short-changing Collier County taxpayers by planning for separate villages in lieu of a more self-supporting town. As an example, Collier County’s Land Development Code (LDC) requires a minimum of 65

Figure 1: Collier Enterprises’ unofficial town plan.



¹ SRA application documents for all three village state that anticipated build-out is 12 years from date of approval. Since Rivergrass was approved in 2020, this would place Rivergrass’ build-out at approximately 2032. Longwater’s and Bellmar’s build-out would be 2032-2033, if they are approved in 2020 or 2021).

² Rivergrass Economic Assessment September 3, 2019 states permanent population of 4,269; Longwater Economic Assessment May 24, 2020 states permanent population of 4,477; Bellmar Economic Assessment March 12, 2020 states permanent population of 4,736. Rivergrass will provide 2,500 homes, Longwater 2,600 homes, and Bellmar 2,750 homes.

sf gross building area per dwelling unit for goods and services for a town.³ Therefore, a town with 7,850 homes, the same number of homes offered by the applicant’s contiguous villages, must provide a minimum of 510,250 square feet for goods and services. Instead, the applicant proposes a minimum 196,250 sf for goods and services for the three villages, **which is far less than half of the commercial square footage required of a town.** Under the same policy, a minimum of 117,500 sf of civic/governmental/institutional would be required of a town with 7,850 homes. Instead, the applicant offers a minimum of 78,500 sf for the three villages, which is 67% of what is required of a town with the same number of homes. Also, the applicant provides about 263,000 sf less space (or 6 acres less) for community parks than is required of a town, but claim they are exceeding village requirements by providing additional acreage for preserves and amenity centers within two of their village plans.⁴ As example, in Longwater’s Submittal 4 response letter, staff asks the applicant to depict parks within neighborhoods on the Master Plan. The applicant responds by showing segments of the master plan where parks and “park preserves” are located.⁵ The “park preserves” consist of 9.52 acres. However, according to LDC4.08.07.A.1.d,⁶ preserves with an NRI score over 1.2 must be left in a natural state, so preserve acreage cannot be counted toward active public park space. Furthermore, the SRA applications are unclear as to whether the amenity centers would be free and open to the public and, thus, the acreage should not be counted toward park space.

Table 1: Comparison of town requirements to the total amenities provided by Rivergrass, Longwater, and Bellmar Villages.		
	Town Requirements for 7,850 dwelling units	Rivergrass + Bellmar + Longwater Villages commit to provide the following: (7,850 combined dwelling units)
Acreage	1,000 to 4,000 acres	2,997 acres
Housing Diversity	Full range of housing required	Max 90% single family/ Min 10% multi-family (7,065 SF /785 MF) ⁷
Context Zones	3 context zones required	2 context zones provided
Goods and Services	510,250 sf min required (LDC requires min 65 sf per DU)	196,250 sf min provided ⁸ (265,000 sf max provided)
Civic, Government, Institutional	117,500 sf min required (LDC requires min 15 sf per DU)	78,500 sf min provided ⁹
Community Parks	1,570,000 sf min required (LDC requires 200 sf per DU)	1,306,364 sf of “Parks and community green space” provided (29.99 acres) ¹⁰

³ Collier County LDC 4.08.07.J.1
⁴ Longwater Stewardship Receiving Area Credit Agreement SSA14 & SSA17 p. 16/16 states, “Longwater Village contains approximately 39.71 acres of active and passive parks and community green space, exceeding the requirement to provide at least 1 percent of the Village gross acreage, (10 acres, rounded) in the form of Parks and Community Green Space.” Longwater’s master plan shows: 18.01 acres for amenity centers, 12.18 acres for parks, and 9.52 acres for park preserves, totaling 39.71 acres.
⁵ Submittal 4, Response letter dated June 1, 2020. p. 3
⁶ LDC 4.08.07.A.1.d states “Lands or parcels that are greater than one acre and have an Index Value greater than 1.2 shall be retained as open space and maintained in a predominately vegetated state.” LDC 4.08.07.J.6 provides similar language.
⁷ Dwelling units: Rivergrass = 2,500; Longwater; = 2,600; Bellmar --(2,750) Each SRA commits to up to a max of 90% single family homes (7,065) and a minimum of 10% multi-family homes (785). (Information was derived from most recent SRA documents as of 7-12-20 and Rivergrass Resolution 2020-24)
⁸ Commercial provided by Rivergrass = 62,500 sf min to 100,000 sf max; Longwater = 65,000 min sf to 80,000 max sf; Bellmar = 68,750 min sf to 85,000 sf max. (Information was derived from most recent SRA documents as of 7-12-20 and Rivergrass Resolution 2020-24)
⁹ Civic, Government and Institutional provided: Rivergrass = 25,000 sf; Longwater = 26,000 sf; Bellmar = 27,500 sf. (Information was derived from most recent SRA documents as of 7-12-20 and Rivergrass Resolution 2020-24)
¹⁰ Parks and Community Green Space: Rivergrass = 9.98 acres; Longwater = 12.18 acres; Bellmar = 7.83acres. Note: (In addition, Longwater and Bellmar will provide 9.52 acres and 3.44 acres respectively of “park preserves;” however, the acreage cannot count toward public parks. LDC 4.08.07.J.6 states, “Parcels of one (1) acre or more, with a Natural Resource Index rating greater than 1.2, must be preserved as open space and maintained in a

Lastly, **Table 1** shows that towns require a full range of housing types (Policy 4.7.1). If the applicant’s plans are approved, housing within all three villages could consist of 90% single-family homes, which is not only indicative of sprawl, but it is far from providing a full range of housing or even a diversity of housing types as is required of villages under Policy 4.7.2.

In sum, the submission of three adjacent villages -- as well as Collier Enterprises’ recent unofficial acknowledgment that these three villages constitute a unified development plan -- raises important questions including whether the effect of segregating a town into three villages will result in fewer obligations on the developer than intended by the Growth Management Plan and whether the citizens of Collier County will be forced to fund additional infrastructure needs. The bottom line is that Longwater (as well as the other purported villages) should be withdrawn and resubmitted as a Town in order to ensure that the applicant provides the goods and services, housing, design elements, and infrastructure needed for a self-sufficient SRA.

B. Steps taken toward an aggregate review:

The Conservancy appreciates that certain staff have taken a bold and appropriate stance in an attempt to hold the applicant accountable for aggregate impacts from all three developments, pertaining to fiscal neutrality, concurrency management, and traffic. As example, in a February 11, 2020 Consistency Review Memorandum for Longwater Village, staff stated:

“Comprehensive Planning staff also ask that the departments and agencies involved directly with the Concurrency Management give consideration to the cumulative effects or demands of these SRA, rather than considering each only individually.”¹¹

Further down on the same page is a similar statement: *“Comprehensive planning staff also ask that the County staff involved in the review of the Economic Assessment give consideration to the cumulative effects or demands of these SRAs, rather than considering each only individually.”*

Unfortunately, for unknown reasons, both of these statements were redacted in later versions of the Consistency Review Memo.

As another example, the transportation reviewer persisted in efforts to receive a cumulative review of traffic impacts on Collier County’s road network from all the approved and pending RLSA’s villages. Previously, the applicant’s consultant evaluated Longwater’s traffic in a vacuum. In other words, the project’s Traffic Impact Statement (TIS) failed to include background traffic from the applicant’s other two villages, Rivergrass (approved) and Bellmar (pending approval). Nor did the assessment consider background traffic from Hyde Park, a recently approved village by a different applicant. In the April 15, 2020 Review Comment Letter, transportation review staff stated:¹²

“The TIS does not include any discussion/explanation as to how the cumulative impacts of the four proposed developments’ (Longwater Village, Bellmar Village, Rivegrass Village and Hyde Park Village) traffic on the Collier County roadway network were analyzed.”

predominately naturally vegetated state.” Master Plans for all three SRAs provide acreage for Amenity Centers; however, it is unclear whether the applicant intends to offer the amenity centers to all of the public without a cost. Until then, the acreage should not be counted toward community park space. (Information was derived from most recent SRA documents as of 7-12-20 and Rivergrass Resolution 2020-24).

¹¹ Collier County staff Longwater Consistency Review Memorandum February 11, 2020, p. 13/20

¹² Collier County Review Comment Letter for Longwater. April 15, 2020. p. 4.

In the same paragraph, county transportation review staff explained why a cumulative analysis is important: (highlights added for emphasis)

*“The total am and pm peak hour peak direction trips estimated for Longwater Village, Bellmar Village, and Rivergrass Village are approximately 3,600 trips per hour and 3,750 trips per hour. This is proximately 76% of the total a.m. and p.m. peak hour peak direction trips previously estimated for the build-out year (2040) of Rural Lands West. When the a.m. and p.m. peak hour peak direction trips associated with Hyde Park Village are also included, the total a.m. and p.m. peak hour peak direction trips estimated for all four developments are approximately 4,550 and 4,800 trips per hour. **Given the close proximity of these four proposed developments and the relatively limited roadway network in the surrounding area, it seems very likely that the cumulative impact of all this traffic will result in level of service deficiencies for multiple roadway segments and intersections.**”*

Ultimately, staff succeeded in procuring a cumulative analysis from the applicant’s traffic consultant, which demonstrated that Collier County transportation reviewers were justified in their concerns. When Longwater’s traffic impacts from the March 9, 2020 TIS are compared to the “Accumulation Traffic Analysis” from May 29, 2020 it is evident that many more roads would fail when background traffic from the applicant’s other two developments is considered. Longwater’s March 9, 2020 TIS states the following:¹³

*“As such, the following roadway segments are adversely impacted by the project’s traffic:
- Randall Blvd from Everglades Blvd to Desoto Blvd”*

When the estimated background traffic from Bellmar and Rivergrass Village were included in Longwater’s “Accumulation Traffic Impacts Analysis,” several additional roadway segments were shown to be adversely impacted by the Longwater project. The updated TIS from May 29, 2020 states:

*“As such, the following roadway segments are adversely impacted by the project’s traffic:
- Oil Well Rd from Immokalee Rd to Everglades Blvd
- Randall Blvd from Everglades Blvd to Desoto Blvd
- Golden Gate Blvd from Collier Blvd to Wilson Blvd
- Immokalee Rd from Logan Blvd to Collier Blvd
- Immokalee Rd from Collier Blvd to Wilson Blvd”¹⁴*

Without staff’s insistence that the applicant consider background traffic from Rivergrass and Bellmar, it would appear that Longwater’s traffic would have a detrimental effect on only one roadway segment, when in reality five road segments would be adversely impacted by the project. Still, it is unclear whether the developer will be required to provide mitigation for all five roadway segments or for just one roadway segment, and if not the developer, then who will be on the hook to pay for these infrastructure upgrades?

C. Pressure to approve the villages as a package deal:

Although the villages are being reviewed as three separate stand-alone applications, the landowner-developer negotiated a deal with Collier County that ties approvals of all three villages together, essentially in a packaged deal. This deal places Collier County Board of County Commissioners up against a wall, where the

¹³ Trebilcock Planning Engineering. Traffic Impact Statement Longwater Stewardship Receiving Area. Section 1 – Impacts to Roadway Network – Road Segment Analysis. March 9, 2020, p. 24/77.

¹⁴ Trebilcock Planning Engineering. Traffic Impact Statement Longwater Stewardship Receiving Area. Section 2 – Intersection Analyses. May 29, 2020, p. 13/352.

Commissioners either approve the pending village applications for Longwater and Bellmar or enforce eminent domain to obtain the right of way for Big Cypress Parkway (BCP).

The deal, between the county and Collier Enterprises, was made in the “Rivergrass Village Landowner Agreement,” which provides the following stipulations, among other provisions:¹⁵ (highlights added for emphasis)

“8. If the Longwater Village SRA is approved the Big Cypress Parkway right of way from Randall Blvd. to Vanderbilt Beach Road, depicted in Exhibit D, will be sold to the County under the same terms as paragraph 5 above.”

“10. If the Bellmar Village SRA is approved the Big Cypress Parkway right of way from Vanderbilt Beach Road to 6th Street SE, depicted in Exhibit E, and the Big Cypress Parkway right of way north of Rivergrass to Immokalee Road, depicted in Exhibit F, will be sold to the County under the same terms as paragraph 5 above.”

“12. For a period of five (5) years from the effective date of this Agreement, Landowner agrees to reserve the right of way and provide the water management system referenced in paragraphs 8, 9, 10 and 11 for purchase by the County unless: (1) the Longwater Village is denied by Collier County, (2) the Bellmar Village is denied by Collier County or (3) Collier County elects not to acquire the right of way. During the 5-year reservation period, if Landowner withdraws either the Longwater or Bellmar applications, the County will have the right to purchase the reserved right of way and drainage easements.”

The Executive Summary for Rivergrass’ Landowner Agreement asserts that if Collier County Commissioners vote to deny Longwater and Bellmar Villages, the county must resort to condemnation. Here is what is stated: (highlights added for emphasis)

“Staff’s position has been consistent in requesting that the reservation of the complete right of way should not expire nor should it be conditioned on approval of other developments in the future. These conditions represent the limits of where the developer was willing to commit to at this time. While staff is recommending approval, it is important to note that failure to approve the future SRAs, Longwater and Bellmar, would negate the reservation and force condemnation should the County wish to proceed with the construction of Big Cypress Parkway.”¹⁶

It is no secret; the County *does wish* to proceed with the construction of Big Cypress Parkway project. In 2018, the Collier Metropolitan Planning Organization Board (MPO) approved an amendment, which was paid for by Collier Enterprises, to add the \$111 million roadway project to the Collier MPO’s taxpayer-funded Needs Plan.¹⁷ So why would the same commission members, who voted to place BCP on the Needs Plan, do anything other than approve the villages since their approvals are tied to getting the roadway that they want? Especially, since no elected official wants to be in a position where a vote for denial of Longwater or Bellmar equates to a forced condemnation of private property.

¹⁵ Landowner Agreement Rivergrass Village approved by Board of County Commissioners January 28, 2020. BCC Agenda item 11.C.

¹⁶ Board of County Commissioner Agenda January 28, 2020. Executive Summary, Landowner Agreement for Rivergrass Village. (January 28, 2020) Agenda Item 11.C, packet page 1032

¹⁷ Cost of right of way, environmental mitigation and construction of 2-Lane road within 4 land ROW is approximately \$111 million. Collier MPO 240 LRTP Amendment Adoption Report (May 25, 2018). Table 5- Costs of LRTP Amendment Needs Projects, p. 10.

Regardless of ties with BCP, it is the Conservancy’s hope that staff base their recommendation for Longwater and Bellmar solely on the merits of the project. A recommendation of approval shall be granted only if the project clearly meets *all* policies and objectives of the GMP and the LDC.

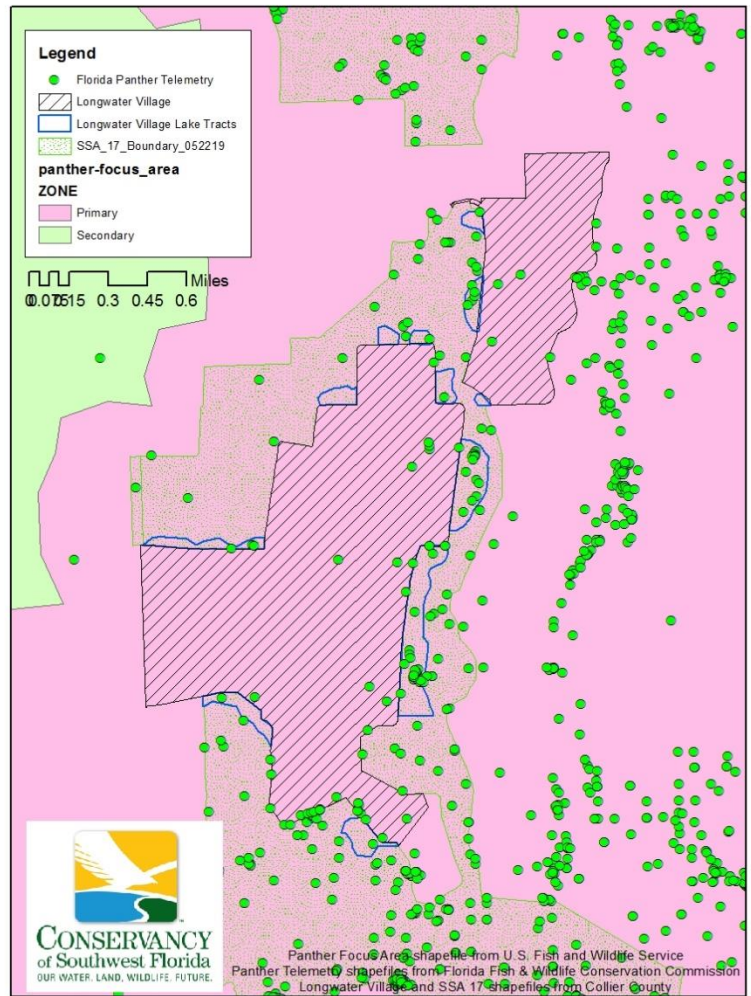
II. Longwater Village would destroy panther habitat, not only within the SRA, but also within the “preserves.”

A. The applicant chose a site that would destroy over 1,000 acres of primary panther habitat.

Leading panther scientists, as established in the best available science Kautz et al. 2006, consider Primary Zone panther habitat “just enough space to support a population that is barely viable demographically as long the habitat base remains stable.”¹⁸ The U.S. Fish and Wildlife Service in their *Florida Panther Recovery Plan* characterizes Primary Zone lands as crucial for the panther’s continued survival and recovery.¹⁹ Considering these facts, one would think that a village, or any SRA for that matter, would be prohibited within Primary Zone habitat of the endangered Florida panther. In direct conflict of the science, the 1,000-acre site that Collier Enterprises has chosen for Longwater Village is *entirely* within Primary Zone panther habitat, shown in pink in **Figure 2**.

The Primary Zone consists of several different land cover types, including agricultural lands that exist within the proposed Longwater Village site. Agricultural lands contain important natural landscape connections that support panther home ranges, panther reproduction, dispersal movements, and availability of large prey.²⁰ Furthermore, Primary Zone habitat, including those consisting of agriculture, helps to support the only breeding population of panthers. Anyone who claims that the Longwater site is not important to panthers

Figure 2: Longwater Village within Primary Zone panther



¹⁸ Kautz, et al. (2006) How much is enough? Landscape-scale conservation for the Florida panther. *Biological Conservation* 130, p. 129

¹⁹ US Fish and Wildlife Service, 2008. “Florida Panther Recovery Plan, 3rd Revision.”

²⁰ Kautz, et al. (2006) How much is enough? Landscape-scale conservation for the Florida panther. *Biological Conservation* 130, p. 118-133 and Cominsky et al (2002). Panthers and Forests in South Florida an Ecological Perspective. *Conservation Ecology* Vol 6, No. 1

because the lands contain agricultural lands is in direct opposition to what best available science and the Panther Recovery Plan states.

Plans by Collier Enterprises to replace 1,000-acres of Primary Zone panther habitat with development not only defies principles of environmental stewardship, but it violates the very goal of the RLSA. The RLSA goal states that “incompatible uses,” such as SRA village development, must be directed away from upland habitat. Clearly, the opposite is occurring with Longwater Village, as the applicant plans on directing development *directly within* listed species habitat.

B. The project would destroy 110 additional acres of Primary Zone and Adult Breeding Habitat within the “preserve.”

Destruction of Primary Zone and Adult Breeding habitat is not limited to just the SRA site; the project would also destroy panther habitat within the adjacent pending Stewardship Sending Area (SSA17), which would become a preserve upon approval. This proposed Stewardship Sending Area (SSA17) is a Water Retention Area (WRA) consisting of 3,113 acres of an ecologically important wetland system, called Shaggy Cypress. SSA17 (**Figure 2**) provides habitat for 12 listed species²¹, including primary habitat for the Florida panther. Longwater’s Master Plan shows that stormwater Lake Tracts (all 110.63 acres) would be excavated within SSA17 (**Figure 2**).

Even though WRAs are identified by the RLSA program, along with FSAs and HSAs, as lands with “the highest priority for natural resource protection,”²² ironically excavation within WRAs is allowed. LDC 4.08.06.A.4.b, states:

“During permitting to serve new uses within an SRA, additions and modifications to WRAs may be required, including but not limited to changes to control elevations, discharge rates, storm water pre-treatment, grading, excavation or fill. Such additions and modifications shall be allowed subject to review and approval by the SFWMD in accordance with best management practices.

However, the same policy also states that there **shall be no net loss of habitat function, unless the applicant provides mitigation or restoration**. LDC 4.08.06.A.4.b continues: (highlights added)

“Such additions and modifications to WRAs shall be designed to ensure that there is no net loss of habitat function within the WRAs unless there is compensating mitigation or restoration in other areas of the RLSA District that will provide comparable habitat function. Compensating mitigation or restoration for an impact to a WRA contiguous to the Camp Keais Strand or Okaloacoochee Slough shall be provided within or contiguous to that Strand or Slough.”

Figure 2 shows that all of SSA17, including the location of the proposed lake tracts, fall within the Primary Zone, depicted in pink. Obviously, excavation of those lands for lake tracts would destroy primary panther habitat resulting in a net loss of habitat function (and loss of spatial extent of habitat) for the endangered Florida panther. In addition to a reduction in Primary Zone habitat, panther breeding habitat would also be demolished. The Conservancy hired Dr. Robert Frakes, a leading panther scientist, to assess any loss of Adult Breeding panther habitat from the construction of the applicant’s villages, including Longwater Village. The authors of the Frakes et al. (2015) study²³ describe the critical nature of maintaining Adult Breeding Habitat for the panther:

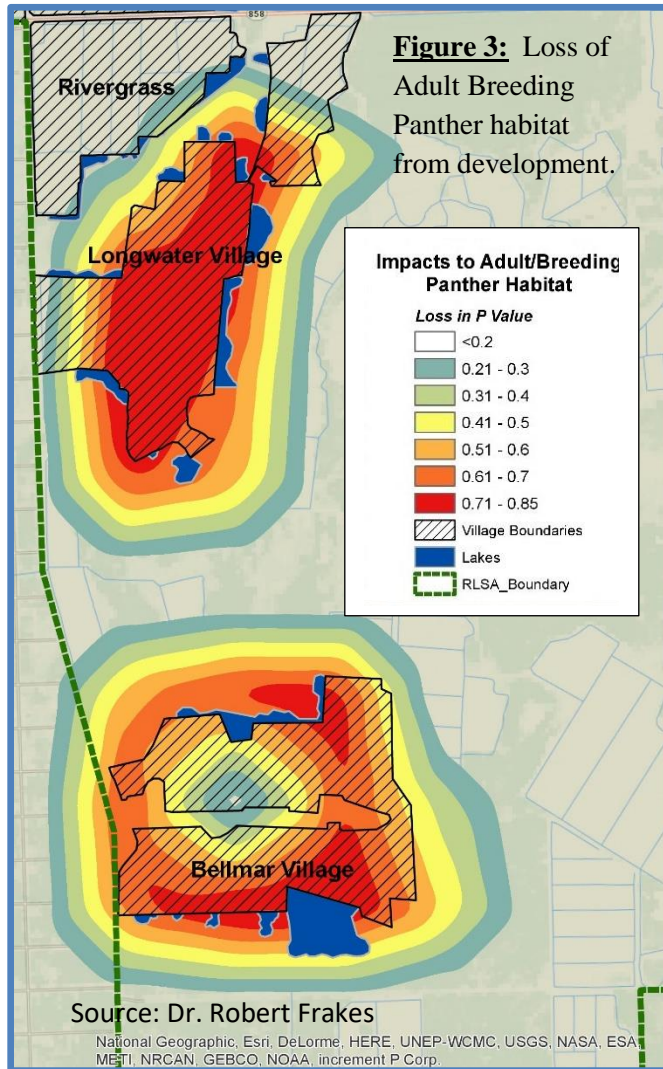
²¹ Passarella and Associates. Stewardship Sending Area 17 NRI Assessment Listed Species Occurrence Map (July 2018).

²² Collier County Future Land Use Element, RLSA Overlay Policy 1.18

²³ Frakes RA, Belden RC, Wood BE, James FE (2015). Landscape Analysis of Adult Florida Panther Habitat. *PLoS ONE* 10(7): e0133044. doi: 10.1371/journal.pone.0133044

“Because there is less panther habitat remaining than previously thought, we recommend that all remaining breeding habitat in south Florida should be maintained, and the current panther range should be expanded into south-central Florida.”²⁴

Dr. Robert Frakes, the leading author of the study, provided the Conservancy with a map showing the location of



where significant loss in function of Adult Breeding Habitat is predicted if the villages were to move forward. According to Frakes et al. 2015 model, lands with a value of 0.338 or higher are considered Adult Breeding Habitat. If direct or indirect impacts occur and the value of the lands become less than 0.338, they lose their function for adult breeding panthers. **Figure 3** shows the loss of Adult Breeding Habitat value from the proposals, with the shaded yellow, orange, and red areas showing the worst impacts to Adult Breeding Habitat. Not only do the SRA sites result in a significant and devastating loss of Adult Breeding Habitat, but nearly all of the lake tracts (shown in blue) within the Water Retention Areas of Longwater and Bellmar²⁵ would also result in habitat function loss.

Undoubtedly, Longwater and Bellmar projects would not comply with the standard under LDC 4.08.06.A.4.b, that states, “**shall be no net loss of habitat function.**” What about the other stipulation that says “**unless the applicant provides mitigation or restoration**”? According to the application materials for SSA17, no restoration activities are planned.²⁶ Also, the Conservancy is unaware of any mitigation provided by the applicant to compensate for the loss of panther habitat destruction specific to the lake tracts within SSA17. In fact, SSA17 lands are considered “preserves” under Collier Enterprises’ application for a federal incidental take permit with the US Fish and Wildlife Service.

Collier Enterprises, along with 11 other landowners formed Eastern Collier Property Owner, LLC (ECPO), where they jointly applied for a federal incidental take permit to develop 45,000 acres of RLSA lands. Their development plan states that “preserves” are offered as mitigation for destruction of nearly 20,000 acres²⁷ of Primary Zone panther habitat. Within their [HCP Land Designations plan](#) for their federal permit, the

²⁴ *Ibid.* p. 1

²⁵ Bellmar Village Master Concept Plan (June 3, 2020) shows that there would be 120.16 acres of lakes tracts within the WRA.

²⁶ We also confirmed with county environmental staff via email May 22, 2020 that no restoration is proposed for SSA17. It appears, based on applicant’s maps of SSA17, that Bellmar’s lake tracts would be located outside of SSA17, unlike Longwater’s lake tracts. However, Bellmar’s MCP depicts that the project is located adjacent to the proposed SSA18. Because the application for SSA18 has not yet been submitted to Collier County it is not possible to determine if the lake tracts fall within SSA18 or whether restoration is proposed.

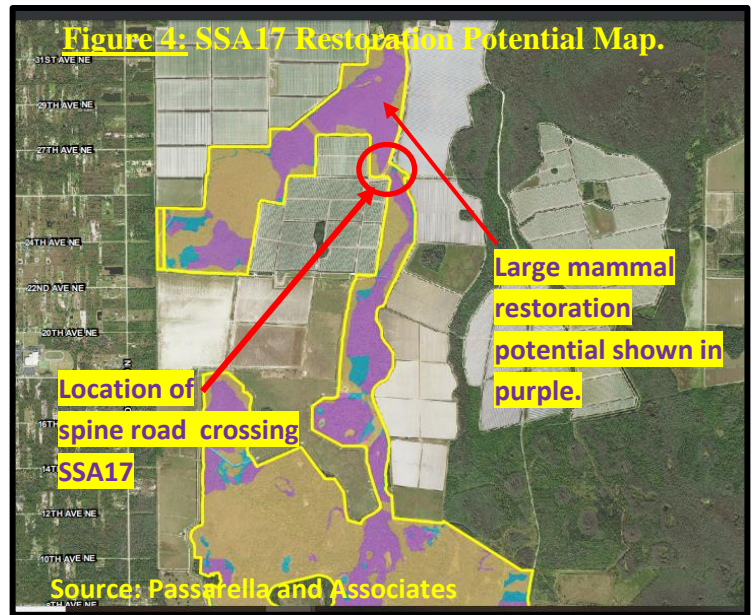
²⁷ Stantec Consulting, Inc. (2018, August). “Eastern Collier Multiple Species Habitat Conservation Plan, prepared for Eastern Collier Property Owners.” p. 88.

Longwater Village SRA site is considered a “Covered” activity, whereas, SSA17 is depicted as a “Preserve.” Their HCP states that “*under the Plan, the primary mitigation for the covered activities includes the phased perpetual preservation of 107,000 acres of diverse habitats, and the maintenance of these preservation lands in perpetuity.*”²⁸ How, then, can the project be consistent with 4.08.06.A.4.b if the applicant plans to destroy habitat within the very preserve lands they are using as mitigation? The answer is simple: the project is *not* consistent with LDC 4.08.06.A.4.b because there would be a loss of habitat function *without* restoration or mitigation for those impacts.

C. Applicant proposes to destroy mammal corridor, while seeking credit for mammal corridor restoration:

Figure 2 provides the location of panther telemetry points. The map demonstrates that not only do panthers traverse the proposed SRA site, but they also regularly travel within the surrounding preserves (SSA17 and SSA15). The preserves are part of the larger Camp Keais Strand wildlife corridor. Wildlife corridors, by definition, are continuous and connecting swaths of natural lands and habitat where mammals can travel unimpeded by development and roads.

The RLSA program grants *Restoration Potential Credit* for lands within Stewardship Sending Areas that have the “potential” to restore large mammal corridors.²⁹ Credit is also given for other restoration purposes, such as the potential to restore wading bird habitat. **Figure 4** shows, in purple, an area where the applicant has applied for Restoration Potential Credit for large mammal corridor restoration, and wading bird habitat restoration, in blue.³⁰ If SSA17 is approved by the county, the applicant would receive Restoration Potential Credit over 626 acres of lands for having the “potential” to restore a large mammal corridor and additional credit for the potential to restore 114 acres of land for wading bird habitat.³¹ What is surprising is that the landowner can earn Restoration Potential Credit even though zero restoration work will be performed, which is the case with SSA17. Regardless, our primary concern for this application is that Longwater’s development plan would destroy the existing wildlife corridor in two ways:



1. Mammal access to the preserves would be deterred for two reasons: First, the applicant plans to build a perimeter stormwater lake system, which would block access to the mammal corridor within the preserve. The applicant’s SRA document states (highlights added): “*Within SSAs 15 and 17, along the eastern boundary of the Village there is a perimeter lake system, designed for stormwater purposes, and as a deterrent to wildlife.*”³² In addition, the surrounding development of Longwater Village would deter mammals from using the preserves within SSA15 and SSA17 due to traffic, lights, and noise.

²⁸ *Ibid*, p. ii.

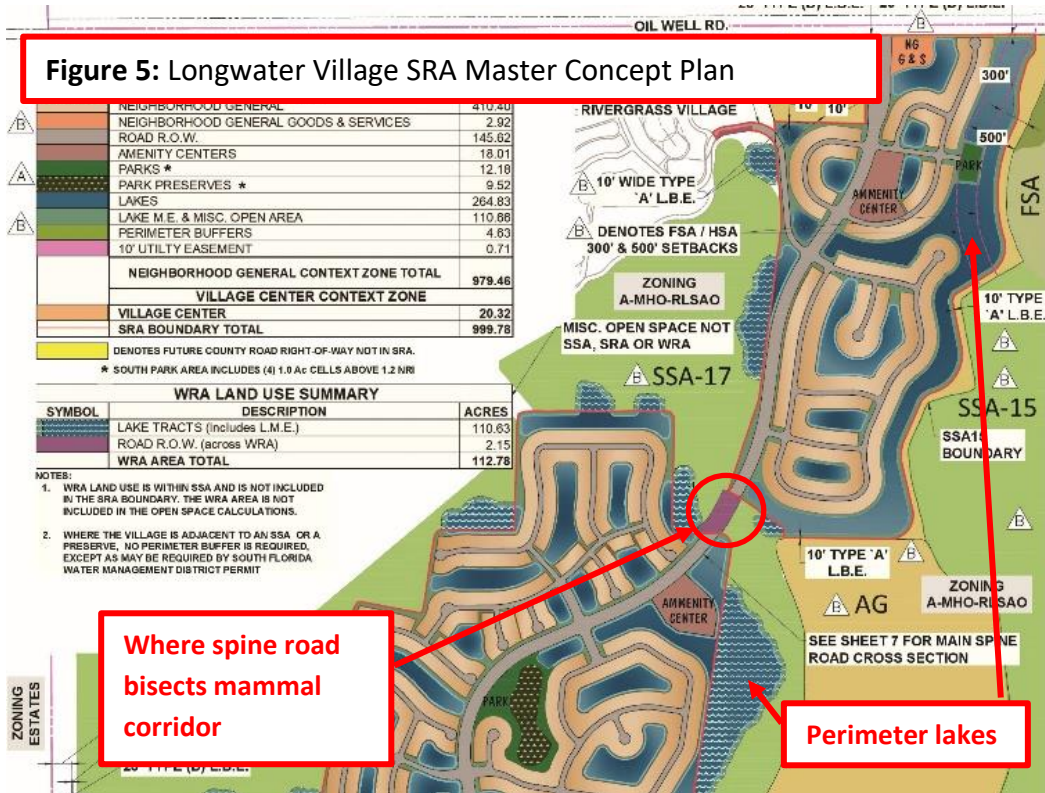
²⁹ Collier County Rural Lands Stewardship Overlay Stewardship Credit Worksheet.

³⁰ Passarella and Associates. SSA17 Aerial with Restoration Potential Index Value Map, Exhibit 3-8. (posted July 16, 2020)

³¹ Passarella and Associates. Natural Resource Index Assessment Stewardship Sending Area 17. Revised January 2020. p. 4 of 4.

³² Submittal 4 –Longwater Village SRA Development Document, p. 3.

2. The applicant’s plan would fragment the wildlife corridor. **Figure 5** is of the project’s Master Concept Plan (MCP), which shows where the proposed spine road would bisect the existing large mammal corridor within SSA17. Each neighborhood, or development pod, within Longwater’s master plan, must exit and enter off of the spine road to travel to the Village Center, Big Cypress Parkway, and Oil Well Road. Vehicular traffic on the village spine road would be heavy and continuous. The applicant’s current Army Corps of Engineers and South Florida Water Management District plans shows only a 4x6 wildlife crossing at this area, which is meant only to accommodate small wildlife species. The applicant does not propose a large mammal crossing at this location because their fencing plans and lake design specifically intend to keep large mammals outside of these preserve areas. The county should seek clarity from the applicant about these plans, as their submittals for their wetland permits seem to be inconsistent with their request to receive large mammal corridor *restoration potential credits* for an area that has specifically been designed to preclude access by these type of species. Additionally, if panthers do gain access to this area by swimming the moat or climbing the fencing, the 4x6 size of the crossing would likely be too small for panthers or other large mammals to dependably utilize to gain safe passage under the roadway.



D. Other options:

In this section of the letter, we explained to you how plans for Longwater Village would impact habitat of an endangered species and an existing mammal corridor. However, Collier Enterprises has other options to build in a way that is less impactful to listed species habitat. The landowner-developer could

build truly sustainable communities on lands outside of the Primary Zone and Adult Breeding panther habitat, while continuing to farm their lands within the Primary Zone. If Collier Enterprises’ property outside of Primary Zone panther habitat is limited, then they could partner with other landowners who own lands outside of essential habitat areas, but are within the Overlay’s “Open” areas. They also have an option of selling Stewardship Credits from SSA14, SSA15, and SSA17 to other landowners who are in need of stewardship credits for increasing SRA acreage.

III. The project is a typical suburban-style development, not innovative planning.

A. Longwater's Village "Center" is on the edge, not the center:

RLSA Policy 4.7.2 states, "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.**" Longwater's Village Center is clearly not the focal point of the community as it is located nowhere near the center. Instead the Village "Center" is located on the extreme western edge of the property, alongside the future taxpayer-funded Big Cypress Parkway. The applicant is placing the commercial "center" along a future county road to take advantage of drive-by-traffic, instead of designing the village to provide its residents with walkable access to goods and services, as is required by the Overlay. This is not innovative planning, as the RLSA requires, this is quintessential suburban-style development.

B. Where is the continuum?:

LDC 4.08.07.3.a.v states that the village must be "*developed in a progressive rural to urban continuum with the greatest density, intensity, and diversity occurring within the village center, to the least density, intensity, and diversity occurring within the Neighborhood Edge.*" In addition, Policy 4.11 states, "*The perimeter of each SRA shall be designed to provide a transition from higher density and intensity uses within the RLSA to lower density and intensity on adjoining property.*" The plan is inconsistent with these two policies for two reasons:

1. Because the developer has placed the mixed-use village "center" along the far western edge of the property, along a spine road and a future county road, no development is planned on two sides of the Village Center. If no development is planned on two sides of the Village Center, then how can a transition or continuum of density and intensity be achieved? Obviously, a continuum or transition on those two sides of the village center are not possible, therefore, the plan does not reach consistency with the Overlay.
2. Up to 90% of the 2,600 homes are single-family spread throughout the Neighborhood General Context Zone. Although the applicant agrees to place 40 multi-family units within the Village Center and some within a ½ mile walk to the center, this does not constitute a progressive continuum of residential density.

C. The plan provides minimal walkability:

Placing the mixed-use Village's "Center" along the edge of the community creates conditions where most residents must drive to get to the Village Center to obtain goods and services. Collier County's Community Character Plan recommends as the optimum distance for creating a walkable neighborhood a ¼ mile radius from the mixed-use center to the neighborhoods.³³ However, most neighborhoods in Longwater MCP are located over a ½ mile from the Village "Center" and many neighborhoods are located over two miles from the center. This is not acceptable, as the majority of the homes should be within walking distance to the mixed-use center. The plan is inconsistent with the following policies which require a walkable SRA:

- LDC 4.08.07.J.3.a.ii: "*Villages shall be designed in a compact, pedestrian-friendly form.*"
- LDC 4.08.07.J.3.b.i: "*The transportation network shall provide for a high level of mobility for all residents through a design that respects the pedestrian and accommodates the automobile.*"

³³ Dover, Kohl & Partners (2001, April). "Toward Better Places: The Community Character Plan for Collier County, Florida." p. 2.8

- Smart Growth Policy 7.4: *“The County shall encourage new developments to provide walkable communities with a blend of densities . . .”*

D. The project lacks connections:

Instead of providing a street grid system with multiple routes to the Village Center, Longwater’s plan provides a “non-village like spine road”³⁴ running through the middle of the elongated project. Each development pod would dump neighborhood traffic onto the 3-mile long spine road, which provides access to the Village Center to the south or Oil Well Road to the north. Because the Village “Center” is on the edge and because the plan provides a spine road instead of a street grid system, the Village Center provides only two pedestrian connections to only one of Longwater’s neighborhoods, or development pods (**Figure 6**). All other neighborhoods must access the spine road to get to the commercial center. As a comparison, the Town of Ave Maria provides nine or ten connections to the Town Center from the surrounding neighborhoods and the campus, which creates multiple routes for the pedestrians, bicyclists, or vehicles (**Figure 7**).

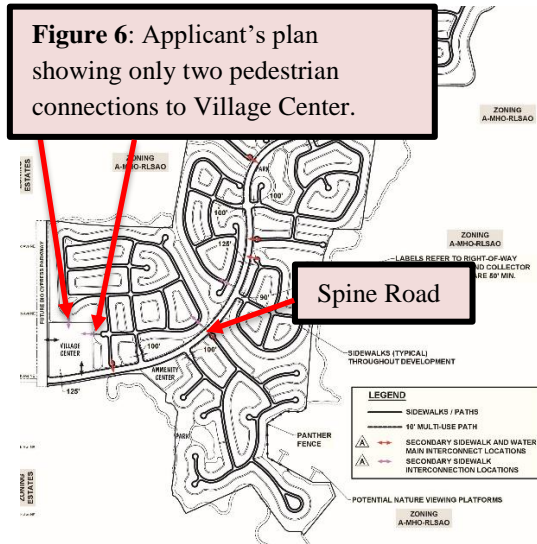
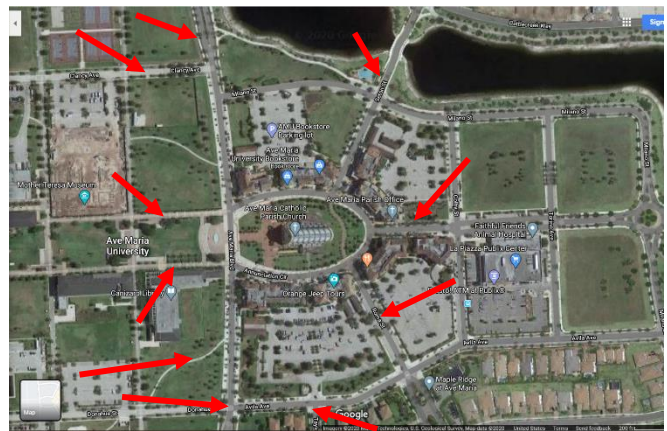


Figure 7: Pedestrian connections to Town Center in Ave Maria.



The lack of interconnections within Longwater Village from the Village Center and to adjoining neighborhoods is inconsistent with several policies, including the following:

- LDC 4.08.07.J.3.a.ii (Village Design Criteria): *“Create an interconnected street system designed to disperse and reduce the length of automobile trips.”*
- RLSA Policy 4.7.2: *“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.”*
- LDC 4.08.07.J.1.a (Village Characteristics Table B. Transportation. Required Uses): *“Auto-interconnected system of collector and local roads;”*

³⁴ Staff commented in the July 8, 2020 Consistency Review Memorandum that *“Internal accesses are provided for the proposed development, including indirect accesses in to the northerly and southerly residential areas from the non-village like spine road and indirect access into the residential area and Village Center tract.”* p. 13

- LDC 4.08.07.J.3.b (Transportation Network) states, *“The transportation network shall be designed in an interconnected system of streets, sidewalks, and pathways.”*
- Smart Growth Policy 7.3, states, *“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.”*

E. Longwater Village lacks housing diversity and affordability:

A plan consisting 90% of single-family homes is not only a prime characteristic of sprawl, but it would be detrimental for the future of eastern Collier County. A village plan lacking in a variety of housing types, sizes, and prices ranges, would force those employed within Longwater’s Village Center to seek suitable and affordable housing elsewhere in the county. Because the Overlay requires villages to be self-sufficient, every village and town must provide housing for all ages, diverse family-types, and income brackets. This ensures that essential personnel, such as fire and EMS workers, teachers, nurses, and utility workers, are able to work and live in eastern Collier County.

The Conservancy supports staff’s statement: *“diversity is achieved in allowing different configurations among single-family detached and attached, and two-family dwellings, zero lot line, town home, and other multi-family dwellings.”*³⁵ We, also, fully support staff’s recommendation to require a housing needs analysis to *“estimate the affordable housing demand generated by Longwater Village, as well as a plan to address the supply of those units”* or staff’s recommendation to require a minimum commitment of affordable housing.³⁶

As stated in staff’s housing review, the applicant has not reached consistency with the following policy:

- LDC 4.08.07.J.3.a.iv (Village Design Criteria): *“Offer a range of housing types and price levels to accommodate diverse ages and incomes.”*

In addition to 4.08.07.3.a.iv, Longwater Village SRA fails to conform to these other policies pertaining to housing diversity:

- Policy 4.7.2: *“Villages are primarily residential communities with a diversity of housing types and mixes of uses appropriate to the scale and character of the particular village.”*
- LDC 4.08.01.UU: *“Villages are a form of SRA and are primarily residential communities with a diversity of housing types and mix of uses appropriate to the scale and character of the particular village.”*
- LDC 4.08.07.C.2: *“Villages. 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 .”*
- Attachment C: Stewardship Receiving Characteristics for a village: Requires *“Diversity of single family and multi-family housing types, styles, and lots.”*
- Smart Growth 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.”*

³⁵ Collier County Longwater Village SRA Consistency Review Memorandum, February 11, 2020. p. 7.

³⁶ Collier County. Longwater Village CHS Staff Review, April 13, 2020. Community and Human Services Division.

Conclusion

The Conservancy of Southwest Florida urges you to recommend denial of the SRA Application for Longwater Village as the project contradicts the fundamental goal of the RLSA Overlay to protect listed species habitat and to prevent urban sprawl. The proposed location of the development, which is entirely within habitat for the endangered Florida panther, flies in the face of responsible environmental and rural land stewardship. Moreover, the design of the project defies basic smart growth design principles which are a fundamental element of the overlay.

We urge you to require the applicant go back to the drawing board to drastically modify the development footprint outside of Primary Zone panther habitat, re-apply under town standards, and design the project to uphold the principles of the Overlay. If you have any questions or if you would like to discuss these matters further, you may reach us at (239) 262-0304.

Sincerely,

A handwritten signature in blue ink, appearing to read 'April Olson', is placed on a light yellow rectangular background.

April Olson
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AprilO@Conservancy.org
