Rural Lands West –
Why the Conservancy is Concerned About This Proposed New Town

Collier Enterprises would like to build a four thousand acre new town in eastern Collier County, called Rural Lands West, which would have 10,000 homes and over 2 million square feet of commercial and other non-residential uses. If they receive the necessary permits, Rural Lands West (Figure 1) will be the second town within the Rural Lands Stewardship Area (RLSA), after Ave Maria. The RLSA is a 300 square mile planning area east of Golden Gate estates that is known for its ecologically important lands and vast agricultural fields. The area is also home to a multitude of unique species, many of which are listed as federally threatened or endangered, including the Florida panther.

New towns and villages built within the RLSA must meet the three goals of the planning overlay, which are to: (1) protect agriculture, (2) direct incompatible uses away from wetlands and listed species habitat, and (3) discourage sprawl by using innovative planning techniques. Collier Enterprises claims that their proposed new town, Rural Lands West (RLW) meets all of those goals. If the only information you read about RLW was from their website, you probably would think that the proposed town is the perfect model for sustainable...
development and environmental stewardship. Collier Enterprises provides the following statements about their plans for the new town from their website:\(^1\):

“Care and respect for the environment is an essential theme for Rural Lands West;”
“This type of stewardship has been part of Collier Enterprises’ history for more than a century;”
“Collier Enterprises has joined four leading conservation organizations . . . in a collaborative effort to protect the Florida Panther . . .”

The reality of the proposed town is that the project is the antithesis of sustainable planning, environmental stewardship, and the three goals of the RLSA. First, the very location of the proposed new town is completely inappropriate and will have grave impacts on the endangered Florida panther. Collier Enterprises does virtually nothing to avoid or minimize these impacts, as over 75% of the site lies within the Primary Zone panther habitat and adult breeding habitat of the Florida panther (Figure 2), recognized by scientists\(^2\) as essential to the panthers’ recovery and survival. Even though Collier Enterprises owns enough land outside of the primary zone and adult breeding habitat to build their new town, they choose a site for their town that will further imperil the iconic species.

Not only does RLW fail to protect listed species habitat, the plan does little to curb sprawl. One of the main objectives of the RLSA program is to condense density onto a smaller footprint by creating mixed-use compact communities. Policy 1.2 of the RLSA Overlay states, “The Overlay

\(^{1}\) http://rurallandswest.com/


protects natural resources and retains viable agriculture by promoting compact rural mixed-use development as an alternative to low-density single use development.” However, RLW will only average 2.44 dwelling units (DU) per buildable acre. That is far lower gross density than many planned unit developments, such as the Vineyards at 3.02 DU, Lely Resort at 3.10 DU and Pelican Bay at 3.89 DU, which were built without the stringent requirements of the RLSA for building a compact form of development. The RLSA Overlay allows up to 4 DU per acre for Stewardship Receiving Areas (SRA) for towns and villages. In order to truly build compact communities that save agricultural lands and natural resources, RLW should maximize the allowable density per RLSA zoning and reduce the footprint.

Collier Enterprises’ is requesting 51 deviations from the land development code in their application! If they are approved, many of those deviations would allow the applicant to digress even further from creating a compact-walkable town by increasing the block size, lowering the building heights, and increasing auto-dependence. The proposed deviations also reduce the minimum requirements for providing native vegetative, landscape buffers, and the number and size of trees.

Even worse, the applicant recently modified their plans to increase the size of the town’s golf course. A typical golf course community is 18 to 36 holes, but Collier Enterprises wants to build a 54-hole golf course! This is not innovative town planning like the RLSA’s policies require, rather just another sprawling golf course community.

Comments provided by Collier County staff on their review document also question how Rural Lands West fulfills the requirements of the Overlay. The Consistency Review Memorandum from August 3, 2018, states:

“The proposal is rendered inconsistent with the RLSA by the nature and number of deviations requested, while opportunities for meeting or enhancing consistency with the RLSA are not pursued /proposed.”

The report also states: “Development standards (and deviations) do not further enhance the tools, techniques and strategies based on principles of innovative planning and development strategies.”

And: “An interconnected road system is provided; however, it does not reflect the design characteristics intended by the RLSA Overlay.”

There is no doubt that Collier Enterprises can do a much better job at fulfilling the goals of the RLSA.

Since the application materials for RLW are lengthy and contain numerous submittals, a summary of important information regarding the proposed town of Rural Lands West is provided below. After the summary, a list is provided of the Conservancy’s concerns of the proposed town and our solutions to better protect natural resources and to ensure that smart growth principles are implemented.

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3 Collier County Growth Management Department, Zoning Division. Consistency Review Memorandum, dated August 3, 2018.

4 Retrieved from https://www.colliercountyfl.gov/home/showdocument?id=73654 on 9/1/2018

5 Rural Lands West Deviation Request posted on Collier County’s GMD public portal on 9/18/2018. Appendix F – “Deviations and Justifications – Rural Lands West”

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## Rural Lands West Phase 1 - SRA Application Summary

<table>
<thead>
<tr>
<th>LOCATION</th>
<th>East of Golden Gate Estates bisected by Oil Well Road, within the RLSA Overlay planning area.</th>
</tr>
</thead>
<tbody>
<tr>
<td>APPLICANT</td>
<td>Collier Enterprises</td>
</tr>
<tr>
<td>STATUS OF SRA APPLICATION (SRA = Stewardship Receiving Area. In this case the SRA is for a new town)</td>
<td>To date, 7 submittals of the SRA application for RLW have been posted on the County’s website, with staff asking for additional modifications and/or clarifications, many of which have yet to be addressed by applicant.</td>
</tr>
<tr>
<td>SIZE OF RURAL LANDS WEST (SRA) (Figure 3)</td>
<td>4,092 acres (RLW will be approximately 6 miles long by 2 miles wide)</td>
</tr>
<tr>
<td>PROJECT AREA</td>
<td>South Florida Water Management District (SFWMD) permitted project area is 10,264.63 acres (incudes SSAs &amp; WRAs –used for water retention and storm water systems)</td>
</tr>
<tr>
<td>NUMBER OF NEW HOMES PROPOSED</td>
<td>10,000 Homes (+6,285 single family; +500 multi-family rental; +3,215 condominiums; + 200 Accessory DU through Pilot Program)</td>
</tr>
<tr>
<td>SQUARE FEET OF NON-RESIDENTIAL DEVELOPMENT &amp; OTHER USES</td>
<td>Approximately 2,093,00 square feet (800,000 sf retail; 450,000 sf office use; 100,000 sf medical office and facilities; 250,000 sf light industrial; 211,000 sf civic uses; 220 hotel rooms; and 3 public schools)</td>
</tr>
<tr>
<td>DWELLING UNITS (DU) PER ACRE</td>
<td>2.44 Residential DU per gross acre</td>
</tr>
<tr>
<td>GOLF COURSES</td>
<td>54 holes</td>
</tr>
<tr>
<td>PROJECTED POPULATION FOR SRA</td>
<td>14,879 (permanent residents); 17,855 (includes seasonal); 23,208 (permanent, seasonal, &amp; employment)</td>
</tr>
<tr>
<td>CONSTRUCTION TIME FRAME</td>
<td>Start 2021 to build out in 2040</td>
</tr>
<tr>
<td>LISTED SPECIES FOUND ON SITE</td>
<td>Federally listed species – Florida panther, wood stork, crested caracara; State listed species – little blue heron, snowy egret, tricolored heron, roseate spoonbill, limpkin, white ibis, Florida sandhill crane, Big Cypress fox squirrel; Bald eagle &amp; Florida black bear – No longer listed but protected</td>
</tr>
<tr>
<td>ACRES OF PRIMARY ZONE PANTHER HABITAT</td>
<td>Approximately 3,100 acres or 76% of site</td>
</tr>
<tr>
<td>INCIDENTAL TAKE PERMIT (ITP) &amp; EASTERN COLLIER MULTI-SPECIES</td>
<td>RLW is part of a larger “Habitat Conservation Plan” (HCP) that includes adjacent lands within the RLSA. The HCP is in quote</td>
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</tbody>
</table>
**“HABITAT CONSERVATION PLAN”**

connection with an application for an incidental take permit (ITP), under the Endangered Species Act. If approved, the ITP will allow new towns to be built within habitat of federally listed species, including the Florida panther. The Conservancy does not agree that the landowner’s HCP will protect habitat. In fact, the HCP will do the exact opposite.

**IMPORTANT HABITAT CONNECTIONS TO STATE & FEDERAL PRESERVES**

1. Corkscrew Swamp Sanctuary
2. Florida Panther National Wildlife Refuge
3. Picayune Strand State Forest
4. Fakahatchee Strand Preserve State Park

**ACREAGE OF WETLAND IMPACTS**

Total wetland impacts from project = **479.48 acres.**

**IMPORTANT FLOW-WAYS**

RLW site is adjacent to Camp Keais Strand, which is an important natural slough that conveys sheet flow through wetlands starting at Lake Trafford through Florida Panther National Wildlife Refuge and to Fakahatchee Strand.

**STORM WATER MANAGEMENT SYSTEM**

Stormwater from development will be discharged into linear lakes (moats) around the development and then treated and discharged into Shaggy Cypress (SSA) & then into Camp Keais flow-way.

**COST OF BIG CYPRESS PKWY**

$110,854,883

**REQUIRED STEWARDSHIP CREDITS FOR RURAL LANDS WEST SRA (town)**

31,699 Stewardship Credits
(Total credits to be earned from SSAs 14, 15, 16, & 17 = 68,839.40, but only 31,699 will be applied to RLW SRA)

**SHAGGY CYPRESS PORTION OF SSA 17**

1,158.32 acres (SSA 17 totals 2,716 acres)

**CREDITS PROPOSED FOR “PROTECTING” SSA 17 & ACRES ENTITLED FOR DEVELOPMENT**

4,707.6 Stewardship Credits proposed to be earned, entitling 588.5 acres for development. (See Conservancy’s concern regarding Shaggy Cypress in section below)

**APPLICATION /PERMIT STATUS**

State – South Florida Water Management District - issued Environmental Resource Permit, April 2018

Local - Collier County – Application is currently on hold until applicant addresses numerous concerns by County staff.

Federal - Army Corps of Engineers – Application is currently under review. Decision will be made when applicant completes Endangered Species Act review. Applicant has included RLW in the proposed HCP. Public comment period for HCP will be 45 days upon release of revised HCP, which will occur soon.

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12 Passarella & Associates. (2018, January 4). Rural Lands West SFWMD Wetland Impact Map. P. 1 of 52. Exhibit No. 3.7. (282.33 acres of direct wetland impacts + 143.69 acres of PFW impacts + 35.72 acres of secondary impacts + 2.09 acres secondary PFW impacts + 15.65 impacts to other surface waters)
13 Collier County MPO 2040 LRTP Amendment Adoption Report, p. 10.
14 Collier County Growth Management Department, Zoning Division. Consistency Review Memorandum, dated August 3, 2018
15 Collier Enterprises Management, Inc. Sketch and Description of SSA-17.
In 2007, Collier Enterprises submitted an application for the Town of Big Cypress, which was a similar footprint as Rural Lands West. However, Collier Enterprises did not move forward with that application, likely due to the recession. A new application for Rural Lands West SRA was submitted in 2016. Since then, Collier Enterprises has revised their SRA application seven times.

The Conservancy reviewed both the RLW’s and Town of Big Cypress’ applications submitted to Collier County, South Florida Water Management District, and the US Army Corp of Engineers. Below are some of our concerns of the proposed town, as well as our solutions to better protect natural resources and create a more compact sustainable community.
| CONCERN: | Rural Lands West needs to be drastically modified or the development will gravely impact the recovery and survivability of the endangered Florida panther. |
| SOLUTION: | The majority of RLW’s site lies within Primary Zone panther habitat and adult breeding habitat. Recent panther science shows that in addition to Primary Zone panther habitat, all adult breeding habitat should be maintained. Rural Lands West development footprint should be moved north of the current site where Collier Enterprises owns other parcels in the Secondary Zone panther habitat, outside of primary panther and adult breeding habitats. This would conserve greater areas of agricultural lands; while at the same time provide far greater protections for the Florida panther. (See our solution for a better alternative footprint in Figure 4). |

| CONCERN: | Rural Lands West will create sprawl, which is contradictory to one of the main goals of the RLSA program. |
| SOLUTION: | The Master Concept Plan for Rural Lands West Needs to be redesigned so that the development footprint is condensed (See Figure 4 for our solution for a more sustainable development footprint). By condensing the development footprint to 2,500 acres, agricultural lands, wetlands and listed species habitat will be saved; thereby better achieving the goals of the RLSA program. Collier Enterprises could increase the number of dwelling units per acre to 4 DU to achieve the maximum number of dwelling units. The increased in dwelling units per acre on a smaller footprint can be accomplished by increasing building heights and by removing the plans for a 54- hole golf course. The applicant’s proposed deviations from Collier County’s land development code that stray from compactness and walkable communities should be denied. |

| CONCERN: | The Shaggy Cypress WRA located in the northern half of the site (Figure 3), provides the panther with 1,158 acres of primary zone habitat and adult breeding habitat. The town’s development footprint completely encircles Shaggy Cypress WRA, which will severely impact the functionality of the habitat and could also impact the hydrology of the wetland system. This negates the goal of the RLSA which states that incompatible uses should be directed away from listed species habitat and wetlands. |
| SOLUTION: | Modify site plan to remove development that surrounds Shaggy Cypress WRA. (See our solution for a better alternative footprint in Figure 4). |

| CONCERN: | If Rural Lands West is approved, taxpayers could be on the hook to pay some or all of the $110,854,883 cost for Big Cypress Parkway, which is a roadway proposed within the town. |
| SOLUTION: | Even though the location for the proposed alignment of Big Cypress Parkway is within the site of Rural Lands West, the construction costs for the roadway were added to the Needs Plan of the 2040 Long Range Transportation Plan by Collier County’s Metropolitan Planning Organization (MPO) (See Figure 5). We must stay vigilant to ensure that Collier Enterprises pays for design, permitting, mitigation, construction and maintenance costs for all road projects that would not be needed but for their new town. |

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Figure 4: Conservancy’s Alternative development footprint for Rural Lands West.
Once Rural Lands West is approved, there is no going back! We only have one chance to make sure that the plan adheres to the goals of the Rural Lands Stewardship Overlay. We hope that you get involved in the planning process. Collier County is accepting comments regarding the project now. The first public hearing to the Collier County Planning Commission could take place as soon as November 2018.

To find out more go to: Conservancy.org/RLW or contact April Olson at AprilO@Conservancy.org / 239-262-0304, ext. 250.