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Longwater and Bellmar Villages: A grand deal or a raw deal for Collier County?

What are Longwater and Bellmar?

Longwater and Bellmar are two proposed 1,000 acre villages located in the Rural Lands Stewardship Area (RLSA) of eastern Collier County. The landowner-developer is Collier Enterprises. The location of both 1,000-acre villages is east of Golden Gate Estates and south of Oil Well Rd. The developer has plans to combine Longwater, Bellmar, and Rivergrass (their third village) into an even larger town, called Town of Big Cypress, by connecting all three villages with a 515-acre Town Core along a new road, called Big Cypress Parkway. The \$111 million Big Cypress Parkway¹ will be mostly be funded by Collier County's taxpayers.

How Many Homes and People are anticipated?

According to the developer's plans, the two villages would add approximately 5,300 homes and 11,000 permanent and seasonal residents to Collier County. When Rivergrass' population is included, approximately 16,000 new residents would live in the developer's three villages just east of Golden Gate Estates.² Additional housing within the Town Core will add even more people. The estimated build out date of all three villages is twelve years from approval or approximately year 2032-2033. The developer states that the Town Core will be

¹ Total estimated cost of Big Cypress Parkway is \$110,854,883 from Collier MPOs 2040 LRTP Amendment Adoption Report -Table 5 – Cost of LRTP Amendment Needs Projects.

² Hyde Park Village is another village off of De Soto Blvd and Oil Well Road from a different developer. Hyde Park was recently approved and it will add 1,800 more homes and an additional 4,300 residents, according to the developer's plan. If all four villages are approved, they would equate to approximately 20,000 new residents in the same vicinity of eastern Collier.

built based on market conditions. However, it is nearly certain that the Town Core will not be built until the taxpayer-funded Big Cypress Parkway is built.

Both sides of the coin:

At the hearings and in their advertising, Collier Enterprises proudly exclaims that in exchange for the County's approval of three 1,000-acre villages and a 515-acre town core, that 12,300-acres will be preserved. The developer's website states: *"Collier Enterprises will preserve more than 12,000 environmentally sensitive acres as part of the plan for the Town of Big Cypress and the villages of Rivergrass, Longwater, and Bellmar."*³ The Conservancy believes that preservation of important environmental lands is the most significant benefit of the Rural Lands Stewardship Area (RLSA) program. However, preservation is only one side of the coin, development is the other side. Before Collier County makes a deal with Collier Enterprises it is important to have all the facts. Here are the facts and the other side of the coin that Collier Enterprises is not telling you:

- **IN EXCHANGE FOR THE PRESERVE, THE DEVELOPER CAN BUILD SIX VILLAGES, NOT THREE!** In exchange for those 12,300 acres, the landowner generates enough credits to not only build Rivergrass, Longwater and Bellmar Villages plus the 515-acre Town Core, but they can build **three additional villages of nearly 1,000-acre each!**⁴ That's a total of six villages, plus the town core! Should Collier Enterprises choose to build villages that

³ TownofBigCypress.com. Accessed April 30, 2021.

⁴ The applicant earns credits for preserving areas called "Stewardship Sending Areas" or SSAs. These SSAs generate credits toward Stewardship Receiving Areas (SRAs). SRAs include villages and towns. **The developer will generate 52,295 credits** for setting aside SSA14, SSA15, SSA17, and SSA18. (SSA14 = 12,893 credits; SSA 15 = 31,367 credits; SSA 17 = 4,528 credits; SSA 18 = 3,507 credits) Those SSAs equate to 12,372 acres (SSA14 = 1,713 acres; SSA 15 = 5,253 acres; SSA 17 = 3,148 acres; SSA 18 = 2,258 acres). The developer is using credits right now from those SSAs toward three villages totaling 3,000 acres: Rivergrass, Longwater, and Bellmar. Rivergrass Resolution 2020-024 shows that 6,198 credits were used; Longwater's Submittal 5 -SRA Credit agreement shows that 6,697 credits will be used; Bellmars's Submittal 6 - SRA Credit agreement shows that 6,742 credits will be used. Total Credits applied toward 3,000 acres for 3 villages = 19,637. The proposed Town Core would consume an estimated 3,559 credits (515.1 acres – 159.2 acres for public benefit acres which do not consume credits Per Amendment 4.20 = 355.9 acres); 355.9 acres x 10 credits = 3,559 credits). Credits used for villages = 19,637 + estimated 3,559 credits used per Town Core = 23,196 estimated credits to be consumed. Therefore, there are 29,099 remaining credits (52,295 – 23,196 = 29,099 remaining credits.) Based on the proposed RLSA Amendments, 10 credits per SRA acre would be required. So 29,009 credits / 10 credits per acre = 2,909 remaining SRA acres. **This means that from the 12,300 acres of preserves there are enough credits for an additional 2,909-acre Town or three additional 970 acre villages, in addition to Longwater, Bellmar, and Rivergrass and the 515-Town Core.**

are less than 1,000 acres, they could build far more than six villages. Another option the landowner has, in exchange for the credits generated from the 12,300-acre preserve, is to build Longwater, Bellmar, and Rivergrass Village and the 515-acre Town Core **plus an additional 2,909 acre Town!**

- **DEVELOPMENT IS ALREADY PROHIBITED WITHIN 86% OF THE 12,300 ACRE PRESERVE SITE.**

Collier Enterprises' is not giving up rights to develop all 12,300 acres by placing those lands in preservation. The 12,300-acre property is located in an area of the RLSA that strictly limits development. In other words, even if the developer wanted to develop the 12,300 acres, most of it is protected anyway. Nearly all of the developer's 12,300 acres are located in a Flowway Stewardship Area (FSAs), Habitat Stewardship Areas (HSAs), or Water Retention Areas (WRAs). The RLSA program includes Policy 5.3.1, which states that only 20% of FSAs, HSAs, and WRAs' sites can be cleared and altered, thus, 80% cannot be cleared and altered. Also, Policy 5.1 prohibits all residential uses, general conditional uses, mining, and recreational uses within FSAs, unless the lands have an NRI score of 1.2 or less. Under these policies, 10,625 acres or 86% of the 12,300 acre preserve would be off limits to development and mining by virtue of the property's location within the RLSA.⁵ Furthermore, since the preserve is an agricultural preserve, the landowner may continue to use the lands for farming and ranching operations.

- **IF THE DEVELOPER DID NOT SET ASIDE THE PRESERVE, THEY COULD BUILD LESS THAN 2,500 HOMES. USING CREDITS FROM THE PRESERVE, THE DEVELOPER COULD BUILD MORE THAN 20,000 HOMES.**

Developers who choose to utilize benefits of the RLSA program can earn a 20-fold increase in residential density over the baseline zoning. Instead of building one home per 5 acres, they can build up to 4 homes per acre. This

⁵ Math: SSA14, 15, 17, and 18 = 5,057.2 acres of WRAs; 4,260.4 acres of FSAs; and 2,996.4 acres of HSAs. Policy 5.1 prohibits development and mining within all FSAs, unless the acre has an NRI score of 1.2 or less. There are 77 acres within the acres of FSAs that score 1.2 or less. Thus, 4,183 acres of the total 4,260.4 acres of FSAs is protected. Policy 5.3.1 prohibits site clearing and alteration in FSAs, WRAs, and HSAs within 80% of the property, unless lands are to be used for agriculture. Since FSAs are already protected, then we will apply Policy 5.3.1 to the remaining 8,053 acres of WRAs and HSAs. $8,053 \times 80\% = 6,442$ acres. Thus, there are approximately 6,442 acres of WRAs and HSAs which are protected, plus 4,183 acres of FSAs = 10,625 total areas of the 12,372 site is already protected simply by being located within the RLSA. $10,625 / 12,372 = 86\%$.

is accomplished through a credit system. In exchange for the 12,300 acre preserve, Collier Enterprises will generate enough credits to entitle more than 20,918 homes over 5,230 acres, should they choose to maximize allowable density of 4 homes per acre.⁶ Furthermore, the developer can continue to utilize the 12,300 acre preserve for agricultural uses, in the same way they have been using the land for decades. However, if the developer chooses to build under the baseline zoning of one home per 5 acres and not set aside the preserved lands, Collier Enterprises would be allowed to build less than 2,500 homes over a 12,300 acre footprint.⁷

- THE DEVELOPER STATES THEY ARE RESTORING FLOWWAYS WITHIN THE CAMP KEAIS STRAND, WITHIN THE 12,300 ACRE PRESERVE, BUT THE RESTORATION IS INADEQUATE FOR HYDROLOGIC RESTORATION.

Kevin Godsea, Refuge Manager of the US Fish and Wildlife Service's (USFWS) Florida Panther National Wildlife Refuge (FPNWR), states in a letter⁸ to the Collier County Planning Commission that the USFWS is concerned that the villages' conservation plan omits important wetland restoration activities necessary to improve and restore hydrology in the Camp Keais Strand flow way:

"The application does not address the need for hydrologic restoration of the adjacent Camp Keais Strand Flowway Stewardship Area. Hydrologic restoration of the Camp Keais Strand is clearly a component of the RLSA Stewardship Sending Areas, and is critically important for downstream conservation lands such as the FPNWR ... The applicant's original plans for the Town of Rural Lands West included restoring these approximately 935 acres of farmland in the middle of Camp Keais Strand Stewardship flowway in SSA15, to

⁶ Math: Footnote 4 shows that SSA14, 15, 17, and 18 = 12,372 total acres and will generate 52,295 total credits for Collier Enterprises. If the RLSA Amendments are approved, then 10 credits per acre are required. Landowners who opt to use the RLSA program can build up to 4 homes per acre. Thus, 52,295 credits / 10 credits per acre = 5,229.5 SRA acres x 4 homes = 20,918 homes. If the RLSA Amendments are not approved, then 8 credits per acre is required. 52,295 credits / 8 credits per acre = 6,537 acres for SRAs. 6,537 acres x 4 = 26,147 homes. Although the applicant is choosing to build less than 4 homes per acre for the villages, averaging about 2.6 homes per acre; the applicant is still building far more homes per acre utilizing credits generated from the preserve than the than 1 home per 5 acres allowed under baseline zoning. Furthermore, the three villages will only consume some of the 52,295 credits generated from the preserve. All other villages and/or Towns can be built at 4 homes per acre.

⁷ One home per 5 acres = .20 or 20%. 12,372 acres x 20% = 2,474 homes.

⁸ United States Department of Interior, United States Fish and Wildlife Service, Florida Panther National Wildlife Refuge. Letter to Collier County Planning Commission, dated May 2, 2021 from Kevin Godsea, Refuge Manager

benefit the hydrology of downstream conservation lands. This wetlands restoration was not included in the plans for Rivergrass Village, Longwater Village or Bellmar Village, and we believe that it should, as this type of wetland restoration was clearly the intent when the RLSA was established.”

- LONGWATER AND BELLMAR ARE JUST ONE PART OF A MASSIVE DEVELOPMENT PLAN⁹ FOR THE RLSA.

Development plans do not stop at Longwater and Bellmar. Twelve landowners, including Collier Enterprises, comprise a group called Eastern Collier Property Owner or ECPO. ECPO has plans for 45,000 acres of development is enormous. Forty-five thousand acres is about the same geographic extent as two Fort-Lauderdales or one Washington D.C.

Longwater and Bellmar fail to be fiscally neutral:

Per the RLSA’s rules, villages are **required** to be *“planned and designed to be fiscally neutral or positive to Collier County . . .”*¹⁰ In other words, developers cannot rely on funds from taxpayers to cover costs for infrastructure and services necessary to support the villages. This strict fiscal neutrality rule is unique to RLSA developments because the RLSA is 20 to 30 miles from the coast, making costs for pipes, roads, and services, such as school bussing, more expensive than for developments within the County’s urban boundary.

- A BUSINESS-AS-USUAL APPROACH IS INAPPROPRIATE FOR ESTIMATING THE VILLAGES’ COSTS.

Despite the RLSA’s unique but stringent rule for fiscal neutrality, Collier County planning staff stated that they are using an existing framework for calculating the villages’ fair share of costs. A business-as-usual approach to calculating a developer’s fair share of costs for infrastructure and services is not appropriate for RLSA development miles past the urban boundary. Longwater and Bellmar must be held accountable to meet the RLSA’s strict fiscal neutrality rules not using the existing framework.

⁹ Stantec Consulting Services (2018, August) Eastern Collier Multiple Species Habitat Conservation Plan.

¹⁰ Collier County Future Land Use Element RLSA Overlay Policy 4.18

- LONGWATER AND BELLMAR WILL RESULT IN A \$92.2 MILLION DEFICIT FOR TRAFFIC IMPACTS.

The Conservancy's traffic expert, Norm Marshall of Smart Mobility, Inc., estimates that Longwater will result in a \$48.4 million deficit and Bellmar will result in a \$43.8 million deficit for transportation improvements based on the percentage of improvements the developments' traffic will consume and after impact fee revenues are paid by the developer.¹¹ County staff believes they are charging the highest costs per current impact fee rates. However, Villages are required to be held to a higher standard of fiscal neutrality and cover all costs associated with the developments. Even if staff correctly assumed that they cannot charge the developer any more, per the RLSA's rules, staff should have recommended denial of the projects because they are not fiscally neutral.

- COLLIER COUNTY ERRONEOUSLY DISREGARDS VILLAGE TRAFFIC AS BACKGROUND TRAFFIC WHEN ASSESSING FAIR SHARE OF COSTS FOR ROAD IMPROVEMENTS.

How is the developer getting away with not paying their fair share of impact fees for traffic? Collier County staff is failing to require the developer to pay for traffic improvements due to population increases caused by the villages. Staff claims that many of the road improvements that the county is planning for, such as new and widened roads, are due to background traffic from general population growth, rather than traffic from the individual villages. However, the Long Range Transportation Plan provides evidence which proves that the Longwater and Bellmar's traffic *is* the background traffic causing the need for some of the roadway improvements. The County must acknowledge that the villages are the cause of many of the planned road improvements and the developer must pay for their portion of the road improvements.

- TAXPAYERS WILL SUBSIDIZE A NEW ROAD USED PRIMARILY BY TRAFFIC FROM THE DEVELOPER'S VILLAGES.

Traffic expert, Norm Marshall of Smart Mobility, estimates that 86% of the vehicle miles traveled on Big Cypress Parkway will originate and/or end in

¹¹ Norm Marshall of Smart Mobility Inc. in a presentation to the Collier County Planning Commission for Longwater on February 18, 2021.

one of the three villages.¹² Even though Big Cypress Parkway will primarily serve the villages, the \$111 million road is on the County's Long Range Transportation Plan to be paid for by the Collier County taxpayers, not the developer. Big Cypress Parkway is needed by the developments, so the developer must pay for the road, not taxpayers.

- IT IS INAPPROPRIATE TO USE FUEL TAXES AND GRANTS TO SUBSIDIZE TRANSPORTATION IMPROVEMENTS NECESSITATED BY VILLAGE TRAFFIC.

Collier County staff stated at the Longwater and Bellmar hearings that they can apply fuel tax revenue and grant monies to fund road improvements that are needed due to projected population growth in eastern Collier. However, because RLSA rules require that each development must be fiscally neutral or positive to the county's tax base, it is inappropriate to use fuel taxes to fund the road improvements caused by Longwater and Bellmar, unless it can be demonstrated that the fuel tax revenue is generated solely by the villages. Furthermore, grant monies should not be used to fund road improvements necessitated by village traffic. Grant funds should be used to cover other projects, outside of the RLSA.

- THE ECONOMIC ASSESSMENTS UNDERESTIMATE POPULATIONS OF THE VILLAGES, THEREBY UNDERESTIMATING COSTS OF THE VILLAGES:

Because of the RLSA's fiscally neutrality requirement, an accurate economic assessment is imperative to demonstrate that impact fees cover the projects' costs not only for infrastructure, but also for services such as emergency medical services (EMS), fire, schools, and sheriff protection. However, Longwater and Bellmar's economic assessments underestimate the village populations two ways:

- (1) DPFG INCLUDES HIGH VACANCY RATE: Collier Enterprises' economic consultant (DPFG) stated at the hearings that they included Collier County's vacancy rate of 38% when determining person's per housing unit.¹³ This vacancy rate of 38% is much higher than both Immokalee at 27% and Golden Gate at 11%, which are rural areas, like the RLSA, and adjacent to the RLSA.¹⁴

¹² Norm Marshall of Smart Mobility Inc. Review of Rivergrass Village SRA Traffic Impact Statement.

¹³ March 4th, 2021 testimony from Lucy Gallo of DPF. Hearing video 2:39:37.

¹⁴ Collier County 2016-2020 Consolidated Plan and 2016-2017 Annual Action Plan. Vacancy rates found on page 86. The document states that the County's overall vacancy rate is 37%, however, at the March 4, 2021 hearing for

Because Naples has a high percentage of seasonal second homes and vacation homes, the county's overall rate equates to a higher vacancy rate than the other two locations. Immokalee's rate is likely higher than Golden Gate, because the area has a high concentration of seasonal farm workers. Even though Immokalee and Golden Gate are adjacent to the RLSA, the consultant chose to use Collier County's overall higher vacancy rate. Also, the 2045 MPO provides a map of vacancy rates. The map shows that Longwater and Bellmar are predicted to have a vacancy rate of 15 to 25% in 2045¹⁵. Ultimately, a higher vacancy rate equates to a lower population for the villages, which means costs are understated in the fiscal neutrality assessment.

- (2) OLD DATA: The second way the developer underestimates population of the villages and impact fees is by using old county data that provides fewer people per home than more recent county data showing more residents per home.¹⁶

Ultimately, an underestimation of populations within the economic assessments equates to a lower representation of costs to provide Longwater and Bellmar with infrastructure and services.

- THE DEVELOPER FAILED TO PROVIDE THE REQUIRED FISCAL IMPACT ANALYSIS FOR WATER AND WASTEWATER IMPACTS.

Longwater, Ms. Gallo of DPFPG stated they applied a vacancy rate of 38%. The report states that Immokalee's rate is likely higher than Golden Gate's because there is a high percentage of seasonal migrant workers.

¹⁵ Collier MPO 2045 Long Range Transportation Plan, Technical Compendium, p. 23. Figure 16.

¹⁶ Longwater and Bellmar's economic assessments state that only 1.05 persons per housing unit will reside in the multi-family homes and 2.21 person's per housing unit will reside in the single family homes (permanent populations). This data is from Collier County's 2016 Emergency Medical Services Impact Fee Update, which in turn, gets its data from a 2011 American Housing Survey and 2013 American Community Survey. So the data is approximately ten years old. Ms. Gallo, the DPFPG consultant stated, that they are using data from the County's most recent impact fee data. However, we found numerous more recent sources from the county. Even though the newer data provides person's per household, which excludes the vacancy rate, the numbers could be adjusted to reflect vacancy. The more recent data includes the following: The Collier County Fiscal Year 2019 Water and Wastewater Impact Fee Study, which provided data showing between 2.25 and 2.55 person's will live per household in Collier County; the 2020 Collier County Annual Update and Inventory Report provides an average of 2.5 person's per household for Collier County; and the 2045 Long Range Transportation Plan (LRTP) shows that 2.01 to 3.00 person's per household will live in the area of Longwater or Bellmar. DPFPG argued that their study included only permanent populations and accounted for housing types. However, the LRTP's and the other studies could be adjusted to include a vacancy rate and housing types.

Per RLSA Policy 4.18, Collier Enterprises is required to provide a fiscal analysis for Longwater and Bellmar’s impacts on the Collier County Water Sewer District. However, this analysis was never provided by the developer. According to the AUIR, the County is building a new water and wastewater treatment plant in the Northeast Service Area to serve the villages, and a few other nearby developments, at a cost of \$156.4 million, for just phase one.¹⁷ Also, the 2020 AUIR shows that \$28 million will be spent for storage tanks and pipelines for an interim wastewater facility that will be decommissioned once phase one of the new plant is operational. Longwater and Bellmar will consume over 41% of the capacity for phase one of the new plant,¹⁸ making it even more imperative to provide an analysis to correctly assess the developer’s fiscal impact on those plants. However, instead of requiring the developer to provide the legally required analysis for water and wastewater, Collier County accepted the developer’s flawed methodology, which not only excluded this important analysis, but excluded a third party review. The County provided their own fiscal impact analysis during the Longwater and Bellmar hearing using previously undisclosed sources and data. The Conservancy has yet to fully review the new analysis.

- THE COUNTY COULD COLLECT MORE IMPACT FEES IF THEY WANTED TO. Collier County could collect more impact fees from the developer. At the March 18, 2021 Longwater hearing, the Collier County Attorney stated: *“We do not charge the full impact fees that we can. That’s a policy decision [by the Board of County Commissioners].” “If you really want to be fiscally neutral you would set impact fees, and I mean all the impact fees as high as legally possible. We don’t do that.”*

The Villages will result in severe traffic issues:

Because the projects are not designed according to the RLSA’s rules which require self-sufficient walkable/bikeable communities, traffic from the 11,000+ new

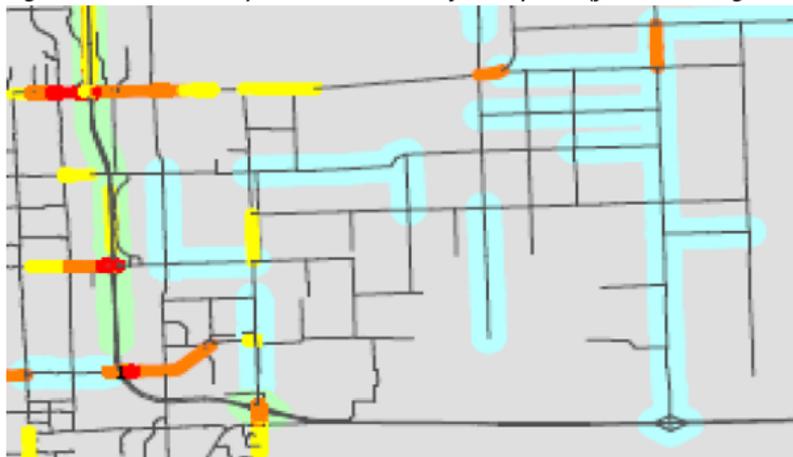
¹⁷ Collier County 2019 and 2020 AUIR/Capital Improvement Element Schedule Update on Public Facilities provided cost for Phase 1 water and wastewater plant.

¹⁸ Longwater and Bellmar’s SRA Public Facilities Impact Assessments. The two projects will consume 41% of the capacity of the 4MGD wastewater plant and 43% of the capacity of the water plant. Note: This includes the potable water and wastewater demand for residential, commercial, and civic uses.

residents will pour out of Longwater and Bellmar and head west towards Naples. Village residents will be compelled to drive toward existing coastal communities to seek out goods, services, entertainment and employment opportunities that the villages will not provide. The additional traffic will exacerbate the county's existing traffic congestion issues.

- **IMMOKALKEE ROAD WILL BE AN "AVOIDABLE TRAIN WRECK".**
Longwater and Bellmar will cause significant traffic impacts to deficient Immokalee Road. Traffic expert, Norm Marshall of Smart Mobility, Inc., reviewed development plans for Longwater and Bellmar and stated that Immokalee Rd will be "An Avoidable Train Wreck." The 2045 Long Range Transportation Plan confirms Mr. Marshall's prediction. Figure A-9 from the 2045 LRTP depicts several segments along Immokalee Road that will fail, even with planned projects that are supposed to alleviate congestion.

Figure 1: Collier County LRTP Network Deficiency Plot (from LRTP Figure A-9)



Key: Red extremely deficient (V/C > 1.15), Orange deficient (V/C 1.0 to 1.15) and Yellow barely adequate (V/C 0.9 to 1.0).

The blue highlights in the figure show planned MPO road expansion projects which are generally designed to serve development as discussed below.

- **LONGWATER AND BELLMAR WILL ADD TRAFFIC TO FAILING ROADS, EVEN AFTER COMMITTED ROAD IMPROVEMENTS ARE COMPLETE.**
At the March 18, 2021 Longwater hearing, Collier County staff admitted that there are several roadways that are projected to fail capacity limits even before the projects are built; however the villages' traffic will make those same roads even worse. Although the County has committed roadway improvement plans to alleviate traffic congestion on some of the roadway

segments, not all failing road segments will be cured. Logic follows that more traffic should not be added to failing roads. Regardless, staff is still recommending approval.

- COUNTY TRANSPORTATION STAFF STATED THAT THE CUMULATIVE TRAFFIC IMPACTS FROM THE VILLAGES WILL BE SIGNIFICANT.

In their August 15, 2020 Review of Longwater, Collier County Planning Staff stated, *“Given the close proximity of these four proposed developments [includes Hyde Park] 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.”* Why then did staff ultimately recommend approval?

What are the environmental concerns?

- LONGWATER AND BELLMAR WOULD DESTROY 2,000 ACRES OF PRIMARY PANTHER HABITAT.

The endangered Florida panther is our state animal and a symbol of Florida. Longwater and Bellmar would result in destruction of 2,000 acres of primary panther habitat. The newly proposed Town of Big Cypress increases the loss of primary panther habitat to over 3,200 acres.¹⁹ This would be a tragic loss for the panther as the species is already restricted to less than 5% of its historic range and only 120 to 230 panthers are left in existence. The loss of additional primary habitat from these two villages places the panther closer toward the brink of extinction.

- THE PROJECTS WOULD RESULT IN A SIGNIFICANT LOSS OF ADULT BREEDING PANTHER HABITAT

The panther will also lose very important adult breeding habitat not only within Longwater and Bellmar’s sites, but also within the adjacent preserves due to the light, noise, and traffic from the developments. Leading panther habitat modeler Dr. Robert Frakes explains why Adult Breeding Habitat is so important to the panther:

¹⁹ GIS data from USFWS shows the following impacts to Primary Zone Panther habitat: Longwater – 1,000 acres; Bellmar – 1,000 acres, Rivergrass – 739 acres; Town Core – 515 acres. The total impact within the SRA boundaries is 3,254 acres. There are additional impacts to primary panther habitat outside of the boundaries for lake tracts that we did not include in the total acres.

“This population may already be at or close to carrying capacity, yet the panther population is probably below what is required for long-term genetic viability. Therefore, protection of the remaining breeding habitat in south Florida is essential to the survival and recovery of the subspecies and should receive the highest priority by regulatory agencies.”²⁰

- THE VILLAGE PLANS FAIL TO ADDRESS LANDSCAPE CONNECTIVITY FOR WILDLIFE.

Bellmar’s site is located only about 1.25 miles from the Florida Panther National Wildlife Refuge and serves as part of a critical wildlife corridor to the panther refuge. The refuge was established in 1989 to aid in the recovery of endangered species, including the Florida panther. The Refuge Manager is concerned that Longwater and Bellmar’s plans do not *“Address the landscape connectivity needs of wildlife such as the Florida panther and black bear.”²¹*

- VILLAGE RESIDENTS COULD PRESSURE PANTHER REFUGE TO HALT PRESCRIBED BURNING.

The Florida Panther National Wildlife Refuge (FPNWR) manager states that they use *“prescribed burning to manage the fire-adapted ecosystems for the benefit of wildlife and to reduce high fuel loads”²²*. The villages are within the path of the smoke that will emanate from some of the prescribed burns. Even if residents and businesses sign an agreement acknowledging the need for prescribed burning, we are concerned that village residents and business owners will eventually pressure the Refuge to stop this necessary management tool, which would impact the ecosystem health of tens of thousands of acres of conservation lands.

- AGRICULTURAL LANDS ARE AN IMPORTANT COMPONENT OF PRIMARY PANTHER HABITAT.

Do not be fooled by those who argue that the endangered Florida panther does not use agricultural lands within designated primary panther habitat.

²⁰ 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

²¹ United States Department of Interior, United States Fish and Wildlife Service, Florida Panther National Wildlife Refuge. Letter to Collier County Planning Commission, dated May 2, 2021 from Kevin Godsea, Refuge Manager

²² *Ibid.*

This claim is simply untrue and it is unsupported by the best available science. The science clearly shows that agricultural lands within primary panther habitat, such as Longwater and Bellmar, provide the Florida panther with core life cycle needs for the purposes of prey support, hunting and stalking, and landscape connections to forested habitats and movement corridors.

Loss of Agricultural Lands will be significant:

The goal of the RLSA's Group 2 policies is to "protect agricultural lands from premature conversion" to other uses, such as development, and to "continue the viability of agricultural production through the Collier County Rural Lands Stewardship Area Overlay." However, Longwater and Bellmar provide evidence that productive agricultural lands are not being adequately protected.

- **THE VILLAGES WILL CONTRIBUTE TO 10% OF THE STATES' ANNUAL LOSS OF AGRICULTURAL LANDS.**

Agricultural lands are a finite resource. However, each year nearly 20,000 acres of Florida's agricultural lands are converted to development or are compromised.²³ Longwater and Bellmar alone would contribute to a loss equivalent to nearly 10% of the states' total yearly loss of agricultural lands. The majority of the village's sites are used for active row crops.²⁴ This is very unfortunate, because agricultural lands provide long-term food security for the region, more access to healthy foods, significant contributions to the economy, employment, water recharge, habitat for listed species and habitat connections, and flood risk reduction.

- **71% OF THE LANDS TARGETED FOR DEVELOPMENT WITHIN THE RLSA ARE USED FOR AGRICULTURAL PRODUCTION.**

²³ American Farmland Trust. 2020 Farms Under Threat. The State of the States, Agricultural Land Conversion Highlight Summary: Florida. From 2001-2006, 298,400 acres of farmlands were developed or compromised. That equates to 19,893 acres per year over 15 years. Longwater and Bellmar will convert 1,911 acres of agricultural lands to development, which is 10% of the state's yearly average of 19,893.

²⁴ The Conservancy viewed GIS land cover data of the village sites April 28, 2021. The GIS data shows that the developments of Longwater and Bellmar Villages would result in a loss of 1,911 acres of agricultural lands, which includes 1,511 of row crops and 360 acres of improved pastures. (1,911/approx. 20,000 acres of state loss = .0955 or 10%)

As previously mentioned, Collier Enterprises, along with eleven other RLSA landowners have plans to develop 45,000 acres of the RLSA. Most of the 45,000-acres worth of development would convert agricultural lands. The Town of Ave Maria, which is partially built, is included in the 45,000 acres. Excluding 5,027 acres for Ave Maria, 39,973 acres remain for development under the landowners plan.²⁵ Of those 39,973 acres, 28,319 acres or 71% of the lands targeted for development in the RLSA are farmlands used for production.²⁶ This equates to a great loss of agricultural jobs and rural character of Collier County.

Longwater and Bellmar are not villages:

Because of the RLSA's vast distance from the County's existing urban area where most of the infrastructure, road network and services are already provided, the RLSA has stricter rules for development. All RLSA development is required to be innovative, compact, self-sufficient, pedestrian-friendly and adhere to smart growth standards. Instead, Longwater and Bellmar are sprawling, auto-centric developments, and typical of most gated suburban developments within Southwest Florida. Longwater and Bellmar must be denied as they do not meet the RLSA's design standards. Collier County planning staff made strong negative statements about Longwater and Bellmar's designs.

- **COLLIER COUNTY PLANNING STAFF STATED THAT LONGWATER'S DESIGN DEPICTS A TYPICAL SUBURBAN DEVELOPMENT, RATHER THAN A VILLAGE.** Here is what staff stated: *"The Longwater Village SRA does not fully meet other requirements of, and does not reflect the innovative planning tools . . . pertaining to design, compactness, housing diversity, walkability, mix of uses, use density/intensity continuum or gradient, etc. In staff's view, this SRA is with some exceptions, a suburban development plan typical of that in the coastal urban area placed in the RLSA and is contrary to what is intended*

²⁵ *Ibid*, Table 4-3 p.88; Covered (development and mining) activities equate to 39,973 acres (19,596.5 acres within Primary Zone Panther habitat and 20,376.5 acres within Secondary Zone)

²⁶ Stantec Consulting Services (2018, August) Eastern Collier Multiple Species Habitat Conservation Plan. Table 4-3 p.88 shows that 19,467 acres of citrus groves, 8,722 acres of row crops, and 130 acres of pecan farms would be converted to development. This totals 28,319 acres.

in the RLSAO.”²⁷ Even though very minimal changes were made to Longwater’s design since the statement was made, staff ultimately recommended approval of the projects. The question is: *Why?*

- COLLIER COUNTY PLANNING STAFF STATED THAT BELLMAR’S DESIGN DEPICTS A TYPICAL SUBURBAN DEVELOPMENT, RATHER THAN A VILLAGE.

Here is what planning staff stated: “*The Bellmar Village SRA still does not fully meet the intent of the policies in the RLSAO pertaining to innovative design, compactness, housing diversity, walkability, mix of uses, use density/intensity continuum or gradient, interconnectness, etc. In staff’s view, this SRA is, with some exceptions, a suburban development plan typical of that in the coastal urban area placed in the RLSA and is contrary to what is intended in the RLSAO...*”²⁸

Again, even though very minimal changes were ultimately made to Bellmar’s design since the statement was made, staff ultimately recommended approval of the projects. The question is: *Why?*

To summarize, here is the *real* deal that the County and Collier Enterprises are negotiating:

In summary, the real deal that the developer is offering to the county is 12,300 acres of lands that are mostly protected through the RLSA program and a flow-way restoration plan that provides inadequate hydrologic restoration, in exchange for credits that would allow the developer to build **SIX 1,000-acre villages!** Longwater and Bellmar Villages alone would significantly increase the county’s population, create severe traffic impacts, contribute to 10% of the states’ total yearly loss of agricultural lands, pass tens of millions of dollars of costs on to taxpayers, and destroy two thousand acres of primary panther habitat of the endangered Florida panther. Instead of a grand deal, as portrayed by the developer, Collier County would be getting a raw deal by approving Longwater and Bellmar.

²⁷ Collier County Consistency Review Memorandum for Longwater Village SRA. February 11, 2020, p. 19 of 20

²⁸ Collier County Consistency Review Memorandum for Bellmar Village SRA. May 27, 2020, p. 11 of 11.