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STAFF REPORT

TO:               COLLIER COUNTY PLANNING COMMISSION
FROM:             GROWTH MANAGEMENT DEPARTMENT, ZONING DIVISION,
                   COMPREHENSIVE PLANNING SECTION
HEARING DATE:     September 19, 2019
SUBJECT:          PETITION PL20180003659 / CPSS-2019-1, SMALL SCALE GROWTH
                   MANAGEMENT PLAN AMENDMENT
                   [ADOPTION HEARING]
                   ( Companion to PL20180003658, Courthouse Shadows PUDA)
ELEMENT:          FUTURE LAND USE ELEMENT (FLUE)

PETITIONER/OWNER/AGENTS:

Petitioner/Owner:  Mark S. Jenkins, Sr. V.P., for
                   KRG Courthouse Shadows, LLC
                   30 South Meridian Street, Suite 1100
                   Indianapolis, IN 46204
Agent:            D. Wayne Arnold, AICP
                   Q. Grady Minor & Associates, PA
                   3800 Via Del Rey
                   Bonita Springs, Florida 34134
                   Richard D. Yovanovich, Esq.
                   Coleman Yovanovich & Koester, PA
                   4001 Tamiami Trail North, Suite 300
                   Naples, Florida 34103

GEOGRAPHIC LOCATION

The subject property comprises ten (10) acres and is located off-frontage, south of the intersection of Tamiami Trail East, (US 41) and Airport-Pulling Road South, and south and east of Peters Avenue, in Section 12, Township 50 South, Range 25 East. The subject property makes up a portion of the larger Courthouse Shadows Commercial Planned Unit Development (a companion PUD amendment (PUDA) petition would change this to a Mixed Use PUD) (±20.35 acres), and lies within both the Mixed Use Activity Center Subdistrict #16 and the Bayshore/Gateway Triangle Redevelopment Overlay (B/GTRO). (East Naples Planning Community) The 10-acre site is depicted with a diagonal striped pattern on the Activity Center #16 map excerpt on the next page.
REQUESTED ACTION

This petitioner seeks to amend Mixed Use Activity Center #16, US 41 and Airport-Pulling Road, in the FLUE Future Land Use Map Series of the Growth Management Plan (GMP), affecting ten (10) or fewer acres, by amending the:

1) FLUM inset map for Mixed Use Activity Center #16 to depict the affected 10-acre area,

2) Bayshore/Gateway Triangle Redevelopment Overlay (B/GTRO) text to revise provisions regarding the uses and density allowed within the affected area.

Both the amended map and Overlay language proposed by this amendment are found in Ordinance Exhibit “A”. [Note: Though the amendment text in petition materials differs from that in the Ordinance, the density is the same and the petition agents have seen and approved of the Ordinance language.]

PURPOSE AND DESCRIPTION OF AMENDMENT

The petitioner proposes amended Overlay provisions that allow a residential density increase of 12.8 dwelling units per acre (DU/A) or 128 DUs; these DUs are limited to rental apartments only and to the 10-acre portion of the PUD that is the subject of this GMP amendment petition. Additional density allowances already existing in the FLUE would allow an additional 172 DUs, for a total of 300 DUs, within that portion of the Courthouse Shadows PUD proposed to allow mixed uses via the companion PUDA petition. The FLUE does not limit these 172 DUs to apartments – they could be single family or multi-family, rental or fee simple ownership – but the companion PUDA does. As the subject site
is presently zoned commercial, which has no assigned residential density, none of the proposed density is an entitlement. Refer to the table below.

<table>
<thead>
<tr>
<th>FLUE Provision</th>
<th>Density</th>
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<tbody>
<tr>
<td>GMP Amendment</td>
<td>12.8 DU/A x 10 acs. = 128 DUs</td>
</tr>
<tr>
<td>Mixed Use Activity Center density</td>
<td>4 DU/A x 18.8 acs. within PUD proposed for mixed use = 75 DUs</td>
</tr>
<tr>
<td>Bayshore/Gateway Triangle Redevelopment Overlay density bonus pool</td>
<td>97 DUs</td>
</tr>
<tr>
<td>SUM</td>
<td>300 DUs</td>
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**STAFF ANALYSIS**

**FUTURE LAND USE DESIGNATION, ZONING AND LAND USE:**

**Subject Property:** The subject property, which comprises approximately 10 acres, is currently designated Urban Mixed Use District, Mixed Use Activity Center Subdistrict, which generally provides for concentrating commercial zoning in locations where traffic impacts can readily be accommodated, to avoid strip and disorganized patterns of commercial development, and to create focal points within the community. Mixed Use Activity Centers are intended to be mixed-use in character [including the full array of commercial, residential, institutional, hotel/motel, community facilities, and other land uses] developed at a human-scale, to be pedestrian-oriented, and to be interconnected with abutting projects. This property also lies within the boundaries of the Bayshore/Gateway Triangle Redevelopment Overlay (B/GTRO), and the Coastal High Hazard Area (CHHA).

It is zoned the Courthouse Shadows CPUD, and developed with a commercial shopping center. (The entire Courthouse Shadows CPUD lies with the Mixed Use Activity Center #16, the B/GTRO, and the CHHA.)

**Surrounding Lands:** The Collier County Government Center, including the Collier Area Transit station, is across US 41 East to the north, and a Walmart store lies to the east across US 41 East. A shopping center lies within ½ mile to the southeast and northwest, as well as several strip centers and individual buildings containing retail, restaurant, office and personal service uses.

**North and East:** The Future Land Use Map designates land north and east of the subject property, across US 41 East, as Urban Mixed Use District, Mixed Use Activity Center Subdistrict; this land is within the boundaries of Mixed Use Activity Center #16. Generally, the governmental properties to the north lie within the boundaries of the B/GTRO and the CHHA, while those commercial properties to the north lie outside the Overlay.

Land nearer Airport-Pulling Road South is zoned Collier County Government Complex PUD and is developed with the County’s Main Administrative Facilities. Land further south and east along US 41 East is zoned C-5, General Commercial, and is developed with a major commercial retailer.
South: The Future Land Use Map designates land lying south of the subject property, across College Court, and across Henderson Creek, as Urban Mixed Use District, Urban Coastal Fringe Subdistrict and within B/GTRO. Generally, properties to the southwest lie within the boundaries of the B/GTRO and the CHHA, while those properties to the southeast, across US 41 East, lie outside the Overlay.

These areas are zoned C-3, Commercial (BMUD R-1), RSF-4, Residential Single-Family (BMUD R-1), and are developed residentially.

West: The Future Land Use Map designates land immediately west of the subject property as Urban Mixed Use District, Urban Coastal Fringe Subdistrict and within the B/GTRO and the CHHA; areas are also within the boundaries of Mixed Use Activity Center #16. These areas are zoned RMF-6, Residential Multi-Family (BMUD R-1), and RSF-4, Residential Single-Family, and are developed residentially. A small number of properties fronting US 41 East, and west of the subject property across Peters Avenue, are zoned C-3, Commercial (GTMUD MXD), and developed as such.

In summary, the subject property lies along the transitional US 41 East corridor – the existing and planned land uses, and current zoning, in the area to the north and east of the subject property are primarily commercial and institutional, while in the area to the south and west of the subject property are primarily residential.

Criteria for GMP Amendments in Florida Statutes

The data and analysis requirements for comprehensive plans and plan amendments are noted in Chapter 163, F.S., specifically as listed below.

Identification and Analysis of the Pertinent Criteria in Florida Statutes, Chapter 163.3187, to Qualify as a Small-Scale Comprehensive Plan (GMP) Amendment:

The process for adoption of small-scale comprehensive plan amendment requires (in part) the following statutory standards be met, [followed by staff analysis in bracketed text].

1. A small scale development amendment may be adopted under the following conditions:
   (a) The proposed amendment involves a use of 10 acres or fewer. [The amendment pertains to a 10-acre property.]
   (b) The proposed amendment does not involve a text change to the goals, policies, and objectives of the local government’s comprehensive plan, but only proposes a land use change to the future land use map for a site-specific small scale development activity. However, text changes that relate directly to, and are adopted simultaneously with, the small scale future land use map amendment shall be permissible under this section. [This amendment involves text changes that relate directly to site-specific Future Land Use Map changes.]
   (c) The property that is the subject of the proposed amendment is not located within an area of critical state concern, unless the project subject to the proposed amendment involves the construction of affordable housing units meeting the criteria of s. 420.0004(3), and is located within an area of critical state concern designated by s. 380.0552 or by the
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Administration Commission pursuant to s. 380.05(1). [The subject property is not within an Area of Critical State Concern.]

(4) Comprehensive plans may only be amended in such a way as to preserve the internal consistency of the plan pursuant to s. 163.3177. [The amendment preserves the internal consistency between and among GMP elements.]

Section 163.3177(1)(f), Florida Statutes:
The process for adoption of a comprehensive plan amendment requires (in part) that plan amendments shall be based upon relevant and appropriate data and an analysis by the local government,

(f) All mandatory and optional elements of the comprehensive plan and plan amendments shall be based upon relevant and appropriate data and an analysis by the local government that may include, but not be limited to, surveys, studies, community goals and vision, and other data available at the time of adoption of the comprehensive plan or plan amendment. To be based on data means to react to it in an appropriate way and to the extent necessary indicated by the data available on that particular subject at the time of adoption of the plan or plan amendment at issue.

1. Surveys, studies, and data utilized in the preparation of the comprehensive plan may not be deemed a part of the comprehensive plan unless adopted as a part of it. Copies of such studies, surveys, data, and supporting documents for proposed plans and plan amendments shall be made available for public inspection, and copies of such plans shall be made available to the public upon payment of reasonable charges for reproduction. Support data or summaries are not subject to the compliance review process, but the comprehensive plan must be clearly based on appropriate data. Support data or summaries may be used to aid in the determination of compliance and consistency.

2. Data must be taken from professionally accepted sources. The application of a methodology utilized in data collection or whether a particular methodology is professionally accepted may be evaluated. However, the evaluation may not include whether one accepted methodology is better than another. Original data collection by local governments is not required. However, local governments may use original data so long as methodologies are professionally accepted.

3. The comprehensive plan shall be based upon permanent and seasonal population estimates and projections, which shall either be those published by the Office of Economic and Demographic Research or generated by the local government based upon a professionally acceptable methodology. The plan must be based on at least the minimum amount of land required to accommodate the medium projections as published by the Office of Economic and Demographic Research for at least a 10-year planning period unless otherwise limited under s. 380.05, including related rules of the Administration Commission. Absent physical limitations on population growth, population projections for each municipality, and the unincorporated area within a county must, at a minimum, be reflective of each area’s proportional share of the total county population and the total county population growth.
Section 163.3177(6)(a)2, Florida Statutes:
The process for adoption of a comprehensive plan amendment requires (in part) that plan amendments shall be based upon surveys, studies and data regarding the area,

2. The future land use plan and plan amendments shall be based upon surveys, studies, and data regarding the area, as applicable, including:
   a. The amount of land required to accommodate anticipated growth.
   b. The projected permanent and seasonal population of the area.
   c. The character of undeveloped land.
   d. The availability of water supplies, public facilities, and services.
   e. The need for redevelopment, including the renewal of blighted areas and the elimination of nonconforming uses which are inconsistent with the character of the community.
   f. The compatibility of uses on lands adjacent to or closely proximate to military installations.
   g. The compatibility of uses on lands adjacent to an airport as defined in s. 330.35 and consistent with s. 333.02.
   h. The discouragement of urban sprawl.
   i. The need for job creation, capital investment, and economic development that will strengthen and diversify the community's economy.
   j. The need to modify land uses and development patterns within antiquated subdivisions.

Section 163.3177(6)(a)8., Florida Statutes:
The process for adoption of a comprehensive plan map amendment [which this is] requires (in part) that plan amendments shall be based analyses of the availability of facilities and services, the suitability of the plan amendment for its proposed uses, and of the minimum amount of land needed to achieve the goals and requirements of the existing subdistricts, overlays and special designations, within which land use programs and activities are ultimately directed.

(a) A future land use plan element designating proposed future general distribution, location, and extent of the uses of land for residential uses, commercial uses, industry, agriculture, recreation, conservation, education, public facilities, and other categories of the public and private uses of land. The approximate acreage and the general range of density or intensity of use shall be provided for the gross land area included in each existing land use category. The element shall establish the long-term end toward which land use programs and activities are ultimately directed.

8. Future land use map amendments shall be based upon the following analyses:
   a. An analysis of the availability of facilities and services.
   b. An analysis of the suitability of the plan amendment for its proposed use considering the character of the undeveloped land, soils, topography, natural resources, and historic resources on site.
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Amending Mixed Use Activity Center #16 in the FLUE
The site is also within the Bayshore/Gateway Triangle Redevelopment Overlay, an Overlay specifically created to encourage redevelopment. The existing shopping center in the Courthouse Shadows CPUD is almost completely vacant.

Though the site lies within the CHHA, mitigation is provided (via the companion PUDA petition) as requested by Bureau of Emergency Services (BES); both US 41 East and Airport-Pulling Road South are emergency evacuation routes; and, for lower intensity storm events, the BES typically encourages shelter-in-place for residents in well-built structures (e.g. concrete block structures built to current Code requirements).

The site is also within the South US 41 Transportation Concurrency Exception Area (TCEA). This area may be exempt from transportation concurrency requirements, so long as impacts to the transportation system are mitigated using the procedures established in Policies 5.5 and 5.6 of the Transportation Element.

Meyers Research prepared a Rental Apartment Needs Analysis (January 2019) as part of the supporting data & analysis submitted with GMPA application materials. The Meyers Research analyzes the [specific] need for market rate rental apartments, revealing that a healthy apartment market is evidenced by rental rates for market-based apartments that steadily increased from the beginning of 2011, by several projects at lease-up stage, and by market rate rental apartments historically hovering near full occupancy rates. The Analysis indicates that the projected population growth provides sufficient demand for market-based apartments, with the ability to absorb from 7,055 (2020) to 7,490 residents (2022).

At the macro level at which a GMP amendment is reviewed, staff is of the opinion that the proposed GMP amendment is appropriate for the site. The companion PUDA petition to implement the subdistrict provisions will need to address specific compatibility measures. These could include maximum building height; landscape buffers, preserve area location, and open space; building locations and minimum setbacks; building massing and orientation.

**Environmental Impacts:**

The subject property is 10 acres of the parent Mixed Use Activity Center #16 and the site is developed with a shopping center.

It is not designated as being located within a County Wellfield Protection Area, but is located in the CHHA.

Policy 12.2.5 of the Conservation and Coastal Management Element (CCME) defines the CHHA. The CHHA boundary is generally depicted on the FLUE’s Countywide Future Land Use Map and is more precisely shown in the Future Land Use Map series.

CCME Policy 12.2.6 requires “all new sanitary sewer facilities in the CHHA be flood proofed, and be designed to reduce leakage of raw sewage during flood events to the maximum extent practicable.” This policy applies to “structures or systems designed for the collection, transmission, treatment, or disposal of sewage” and encompasses both on-site (and typically privately owned) and off-site (publicly owned, in the right-of-way and on County owned lands) facilities. Notwithstanding the objective under which this policy lies, this policy is not limited to public infrastructure – it also applies to private infrastructure.
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As it applies to the proposed small-scale GMPA, there is no action or design required by this policy beyond that which is already required by Collier County, FDEP and possibly other agencies.

Turrell, Hall & Associates, Inc. prepared an *Environmental Due Diligence Report* (amended to January 2019) as part of the supporting data & analysis submitted with GMPA application materials. The *Due Diligence Report* provides a preliminary site assessment and document research in evaluating the proposal, indicating:

- Wetland permitting will be limited to the relocation or improvements to the stormwater outfall structure from the development to the Creek.
- If docks are proposed, then additional state and federal permitting will be required for the docks.
- A gopher tortoise relocation permit may be required if the burrow observed remains active and the proposed redevelopment impacts the area within 25 feet of where the burrow is located.
- Redevelopment will likely require native habitat preservation for the County, which would result in a conservation easement over at least 25% of the shoreline mangroves (assuming they are not within the existing drainage easement).

Staff reviewed the *Report* and determined these evaluation remarks do not directly impact Comprehensive Planning findings. The companion PUDA petition will need to address specific compatibility measures.

**Traffic Capacity/Traffic Circulation Impact Analysis, Including Transportation Element Consistency Determination:**

Both US 41 East and Airport-Pulling Road South are emergency evacuation routes; and, for lower intensity storm events, BES typically encourages shelter-in-place for residents in well-built structures (e.g. concrete block structures built to current Code requirements).

The site is also within the South US 41 Transportation Concurrency Exception Area (TCEA). This area may be exempt from transportation concurrency requirements, so long as impacts to the transportation system are mitigated using the procedures established in Policies 5.5 and 5.6 of the Transportation Element.

JMB Transportation Engineering, Inc. submitted a *Traffic Impact Statement* (revised to April 2019). [Review comments from Transportation Planning staff were not received with regard to the TIS generally, nor to the specific issues of how project traffic engineers are addressing pedestrian traffic issues, including...].
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with the Collier Area Transit station, across US 41 East; the impacts of US 41 East and Airport-Pulling Road South serving as emergency evacuation routes; and, TCEA transportation concurrency requirements.]

Public Facilities Impacts:
The petitioner submitted a Public Facilities Analysis, dated June 18, 2019 (Exhibit V.E). Staff reviewed the Analysis and provide the following [bracketed] remarks:

- Potable Water and Wastewater Treatment Systems: The subject property lies within the City of Naples Potable Water Service Area and the Collier County Water-Sewer District. [System capacity is confirmed at the time of development permit (SDP or PPL) review, and a commitment to provide service will be established upon permit approval.]

  [Eric Fey, P.E., Senior Project Manager Public Utilities Department]

- Solid Waste Collection & Disposal: The solid waste disposal service provider is Collier County Solid Waste Management. The 2018 AUIR notes that the County projects no landfill capacity issues [nor does the pending 2019 AUIR].

- Stormwater Management System: The Facilities Analysis indicates stormwater retention and detention will comply with the SFWMD requirements, and, with County standards for basin [stormwater] discharge rates.

- Park and Recreational Facilities: [A full analysis of impacts to Community or Regional Parks and Recreation Facilities is not provided.] The analysis simply states that parks and recreational facilities are not adversely impacted by the “creation of the subdistrict”, going on to state that the associated multi-family residential development “will pay park impact fees to mitigate their impacts”. [Review comments from Parks & Recreation staff were not received with regard to the lack of an analysis of parks and recreational facilities’ impacts.]

- Schools: [A full analysis of impacts to schools and school facilities is not provided.] The analysis simply states that school facilities are not adversely impacted by the “creation of the subdistrict”, going on to state that the associated multi-family residential development “will pay school impact fees to mitigate their impacts”. [Review comments from Collier County School District staff were not received with regard to the lack of an analysis of schools and school facilities’ impacts.]

- Emergency Medical (EMS) and Fire Rescue Services: The subject property is located within the Greater Naples Fire and Rescue District, who’s collocated EMS/fire station 22 is located at 4375 Bayshore Drive, approximately 1.0 mile to the southwest. No adverse impacts to these safety services result from the proposed development.

NEIGHBORHOOD INFORMATION MEETING (NIM) SYNOPSIS
A Neighborhood Information Meeting (NIM) required by LDC Section 10.03.05.F. was [duly advertised, noticed and] held, jointly for this small-scale Growth Management Plan amendment petition and companion PUD amendment petition, on May 7, 2019, 6:00 p.m. at the Naples Botanical Garden Buehler Auditorium meeting facilities, located at 4820 Bayshore Drive, Naples. Approximately thirty-five people other than the application team and County staff attended.
Wayne Arnold, of Q. Grady Minor (agent representing the applications), introduced other principals present, including Sharon Umpenhour, also of Q. Grady Minor, Rob Sucher of Johnson Development (developer of the residential component), Doug Kirby of Kite Realty (current owners), Christina Johnson of J.R. Evans Engineering (project engineers), Jim Banks of Banks Engineering, and Rich Yovanovich of Coleman Yovanovich & Koester (attorney). James Sabo and Sue Faulkner, AICP, Principal Planners with the Growth Management Department, Zoning Division, and Commissioner Donna Fiala, Board of County Commissioners, were also in attendance.

Mr. Arnold described the existing characteristics of the property, located southwest of US 41 East and south of Airport-Pulling Road. He explained how the small-scale GMPA and PUDA requests will allow the option for residential development, plus existing commercial uses. He displayed a site plan showing a possible arrangement of buildings for the multi-family residential uses.

Mr. Arnold explained how the Activity Centers generally allow for residential uses. This amendment is similar to that previously proposed for the Sam’s Club uses, in that it allows for another development option in Courthouse Shadows. Commercial uses will remain on outparcels, while residential buildings can be located centrally, on a 16-acre internal parcel.

Neighbors in attendance expressed their concerns on automobile traffic, and how this intersection’s high volume in particular, creates lengthy back-ups and a dangerous pedestrian environment. Pedestrian interconnections and safety are major concerns. Mr. Arnold explained that the major employers nearby and pedestrian traffic were characteristics that made this site attractive, and how project traffic engineers will be addressing these issues.

One speaker asked about the residential density, and unit types. Rob Sucher, of Johnson Development addressed this, describing up to 300 market rate apartments, of 1- to 3-bedroom units. Building heights and fire suppression capabilities were discussed.

Concerns were raised over the traffic maneuvers at Peters Avenue. Team discussed how proposal will remove the extra access onto Peters previously approved for Sam’s Club. Mr. Sucher said the developer has prepared a Transportation Impact Study (TIS) to address traffic issues, which directs the residential traffic onto US 41 East access points.

One speaker asked about the type of development and amenities proposed. Rob Sucher discussed how the residential concept included utilization of Haldeman Creek for residents’ recreational access. a dog park, swimming pool, and on-site work centers as office space available to residents. Examples of similar projects located elsewhere were given.

Concerns regarding a history of construction activities, their related problems, and an inability for neighbors to contact someone about them, led Mr. Arnold to commit to providing the surrounding residents with contact phone number(s) for 24-hour responses to their concerns during the construction of the residential component of the project. This may also include during the demolition of the commercial building(s).

Neighbors asked about the public hearing process before the Planning Commission and County Board, and the anticipated schedule these two companion petitions are on. Mr. Arnold explained hearing dates would be posted on their website.

The Information Meeting was ended at approximately 7:10 p.m.
FINDINGS AND CONCLUSIONS

- The subject site is currently zoned CPUD and developed with a 30-year-old commercial shopping center. The entire Courthouse Shadows PUD is designated Mixed Use Activity Center Subdistrict on the FLUM, which allows and encourages mixed use development, and lies within the boundaries of the Bayshore/Gateway Triangle Redevelopment Overlay, an area where numerous incentives promote redevelopment projects.

- The site lies within the South US 41 TCEA, an area where it may require employment of Transportation Demand Management (TDM) strategies to reduce traffic impacts.

- The site also lies within the Coastal High Hazard Area (CHHA). However, the companion PUDA includes mitigation, and both US 41 East and Airport-Pulling Road South are hurricane evacuation routes.

- The site is proximate to major employment opportunities, goods and services, and public transit.

- Analysis indicates that projected population growth provides sufficient demand for market-based apartments.

- At the macro level at which a GMP amendment is reviewed, staff is of the opinion that the proposed GMP amendment is compatible with surrounding properties. The companion PUDA petition will need to address specific compatibility measures.

- No issues regarding impacts upon potable water, wastewater collection and treatment or solid waste collection and disposal services have been identified, nor concerns for impacts upon other public infrastructure.

- The proposed GMP amendment has no effect on the requirements of the Conservation and Coastal Management Element (CCME), and there is no action or design required by Policy 12.2.6 beyond that which is already required by existing regulations.

- People attending the Neighborhood Information Meeting expressed a strong consensus that developing the property needs to take both vehicular and pedestrian traffic and safety into consideration.

- A companion PUDA petition has been submitted concurrent with this GMPA petition to permit 300 market rate rental apartments. Approval of this amendment, and the companion PUDA, would allow the subject property to develop with any one or more of the commercial uses permitted, or with a mixed use (commercial-residential) project.

- A commitment will be fulfilled through the companion PUDA to provide onsite signs posting, or by other means to keep people informed of, contact phone number(s) for 24-hour responses to their concerns during the construction of the residential component of the project. This commitment may also include the period during the demolition of the commercial building(s).
LEGAL CONSIDERATIONS

The Office of the County Attorney reviewed this report on September 9, 2019. In addition to pertinent small-scale (GMP) amendment criteria in Florida Statutes, Section 163.3187 addressed above, the criteria for GMP amendments to the Future Land Use Element and map series are in Sections 163.3177(1)(f) and 163.3177(6)(a)2 and 163.3177(6)(a)8, Florida Statutes. [HFAC]

STAFF RECOMMENDATION

Staff recommends that the Collier County Planning Commission forward Petition PL20180003659/CPSS-2019-1 to the Board of County Commissioners with a recommendation to approve for adoption and transmittal to the Florida Department of Economic Opportunity.
PETITION No.: PL20180003659/CPSS-2019-1
Staff Report for the September 19, 2019, CCPC meeting.

NOTE: This petition has been scheduled for the October 22, 2019, BCC meeting.