

August 16, 2024

3720 Gail Property, LLC  
30533 Biscayne Blvd., Suite 1238  
Adventura, FL 33180

Re: 3720 Davis Boulevard, Naples, Florida

It is my understanding that you desire to construct 96 town house residences on the above referenced property.

The property consists of approximately 12.02 acres of land on the south side of Gail Boulevard, east of Collier Boulevard. The property is designated Urban Residential on the Collier County Future Land Use Map (FLUM) and is within the Coastal High Hazard Area (CHHA). The property is zoned Estates (E), which permits single family residence on lots having a minimum area of 2.25 acres.

#### Conventional Rezoning

The Collier County Growth Management Plan (GMP) Density Rating System (DRS) establishes a maximum density (without affordable housing bonuses or Transfer of Development Rights (TDR's)) of three (3) residential dwelling units per acre for the property within the Urban Residential Designation (CHHA). This designation permits thirty-six (36) residential dwelling units. A rezoning will be required to permit a density of greater than that permitted by the current Estates zoning.

Appropriate conventional zoning districts would be RSF-3, which permits single-family dwellings, and RMF-6. which permits single-family dwellings, duplexes, two-family dwellings, multi-family dwellings and townhouses (townhouses are subject to the site design standards set forth in Land Development Code (LDC) section 5/05/07, which establishes site design standards for townhouses (Copy attached).

Rezoning requires submission of a formal application, a Neighborhood Information Meeting (NIM), two (2) public hearings, one (1) before the Collier County Planning Commission (CCPC) and one (1) before the Board of County Commissioners (BCC). Approval of a Site Development Plan (SDP) and, if necessary, a Plat will be required before development can proceed. Application for SDP and Plat approval can commence while rezoning approval is in process. Typically, a conventional rezoning requires a minimum of nine (9) to twelve (12) months and an additional three (3) to six (6) months to complete approval of a Site Development Plan (SDP)

and, if necessary, Plat approval. It may be anticipated that completion of the approvals necessary to obtain early work permits and commence site development can be achieved in twelve (12) to fifteen (15) months.

#### Growth Management Plan (GMP) Amendment

Rezoning the property to allow a residential density greater than three (3) units per acre will require a Small-Scale Growth Management Plan (GMP) Amendment. The amendment will create a Subdistrict that will permit the desired residential density, establish use limitations and impose general parameters for the development of the property. The GMP amendment will be implemented by a rezoning that will be more detailed than the GMP amendment and will take the form of a rezoning to Planned Development. The Planned Development Ordinance must be consistent with the GMP Subdistrict. Approval of a Site Development Plan (SDP) and, if necessary, a Plat will be required before development can proceed.

The process for GMP and Planned Development approval is similar to that described above with regard to conventional rezoning: a Neighborhood Information Meeting (NIM), two (2) public hearings, one (1) before the Collier County Planning Commission (CCPC) and one (1) before the Board of County Commissioners (BCC).

Applications for GMP and Planned Development rezoning may be submitted and processed simultaneously. Application for SDP and Plat approval can commence while GMP and Planned Development rezoning approval is in process. Typically, a GMP amendment and Planned Development rezoning requires a minimum of twelve (12) to fifteen (15) months and an additional three (3) to six (6) months is required to complete approval of a Site Development Plan (SDP) and, if necessary, a Plat. It may be anticipated that completion of the approvals necessary to obtain early work permits and commence site development can be achieved in fifteen (15) to eighteen (18) months.

The maximum permitted residential density will be determined by the GMP amendment. It must be anticipated that the provision of affordable housing will be a criteria for determining whether density in excess of the current GMP limit of three (3) units and acre will be approved.

#### Affordable Housing

The maximum permitted residential density will be determined by the GMP amendment. It must be anticipated that the provision of affordable housing will be a criteria for determining whether density in excess of the current GMP limit of three (3) units and acre will be approved.

The County’s Growth Management Plan provides for an Affordable Housing Density Bonus. The maximum Affordable Housing Density Bonus (AHDB) is twelve (12) units per acre. Therefore, the maximum density achievable utilizing the AHDB is fifteen (15) units per acre (base 3 + AHDB 12), resulting in a maximum of 180 residential units. However, as this density would be substantially greater than that permitted in the surrounding single family residential neighborhood, and would likely require multi-story apartment structures, it is unlikely that 180 residential units would be approved. A more achievable residential density would be between six (6) and nine (9) units per acre, resulting in between seventy-two (72) and one hundred eight (108) units.

The process for approval of an Affordable Housing Density Bonus requires that an Affordable Housing Density Bonus Allocation be obtained prior to the application for the GMP amendment and rezoning. Due to the County’s policy to expedite approval of affordable housing, it may be anticipated that this can be achieved during the preparation of applications and thus not result in additional approval time.

Potential Affordable Housing Ordinance Amendment

An amendment to the Affordable Housing Density Bonus ordinance is currently under review by the County. If adopted, this amendment could both reduce the time required for approval and reduce the amount of affordable housing required within a development. As currently proposed, this amendment would amend the GMP to allow a density bonus of up to six (6) units without the need for a GMP amendment, which would permit a maximum density of nine (9) units per acre and would establish an expedited review and approval process. The adoption of an expedited review process could reduce the approval times set forth above. It is anticipated that adoption of this amendment will occur within six (6) months..

Summary

The approval time required to obtain zoning entitlements may be summarized as follows:

	Potential Density	Maximum # of Units	Approval Time Months
Conventional Rezoning	3 du/acre	36	9-12
Potential Ordinance	9 du/acre	108	12-15
GMP Amendment/ PD Rezone	15 du/acre	180	9-12

In each instance, an additional three (3) months must be anticipated to complete SDP approval and obtain early work authorizations.

Sincerely,

/s/

Charles J. Thomas

Cc: Noam Kilinsky  
Michael Kilinsky