



NAPLES 2045 COMPREHENSIVE PLAN UPDATE

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COMPREHENSIVE PLAN EVALUATION

Summary of Plan Review and
Initial Findings to Support Vision
Element Implementation

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INTRODUCTION

Naples is a community of distinction. Its beaches and natural environment, attractive neighborhoods, and high-quality commercial corridors are key elements of its unique identity. With few remaining lands left undeveloped within the City, Naples is now experiencing redevelopment of aging properties and corresponding changes in community character. The City is also navigating climate and weather changes that produce more intensive storms, high frequency tidal floods, and increasing rainfall that leaves public areas, private properties, and essential infrastructure vulnerable to flooding.

To address these core issues, Naples has embarked upon a voluntary update to the City's Comprehensive Plan. This effort centers on infusing the principles and directives of the Vision Element throughout the other Elements of the Plan and addressing new and emerging concerns.

About this Report

This report is the second deliverable of the Naples 2045 Comprehensive Plan Update, following the *Public Involvement Plan* (April 2025). It summarizes the findings and initial recommendations resulting from a policy review prepared by the consultant team. The policy review focused on the adopted 2024 *Comprehensive Plan* ("the Plan") and data available from other adopted City plans and policy documents, including:

- *City of Naples Vision* and survey data (Ordinance 2024-15434)
- *Critical Assets and Facilities Vulnerability Assessment* (updated 2024)
- *Critical Assets and Facilities Adaptation Plan* (2024)
- *Adopted Budget Fiscal Year 2024-2025*
- *Capital Improvement Plan Fiscal Years 2025-2029*
- *2022-2023 Collier County Community Assessment*
- *Pedestrian & Bicycle Master Plan 2022 Update*
- *Naples Design District Master Plan* (2022)
- *Naples Parks Master Plan* (2019)
- *Stormwater Master Plan Update* (2018)
- *Downtown Naples Mobility & Connectivity Study* (2017)
- *Naples Redevelopment Plan* (2014)

The evaluation used the Vision Element of the Plan as a framework for assessing the individual goals, objectives, and policies in the Plan. Each component of the Plan was categorized as (i) strongly supporting the intent of the Vision, (ii) could be further strengthened to support the Vision, or (iii) contradictory with the Vision. Findings of this detailed policy review are synthesized in this report using the Vision Element framework, outlined here:

Naples Comprehensive Plan Vision Element

- **OUR PLACE – Preserve Small Town Character and Culture**
 - Scale of development and redevelopment
 - Historic assets
 - Safer streets and traffic calming
 - Zoning and building code enforcement
- **OUR NATURE – Environmental Sensitivity**
 - Water quality

- Recycling and water reclamation programs
- Environmental enhancement and monitoring
- Stormwater Management
- Drinking water
- Beach maintenance and shoreline erosion
- Resilience
- **OUR EXPERIENCE – Extraordinary Quality of Life for Residents**
 - Safety
 - Cleanliness
 - Affordability
 - Comfort and peacefulness
 - Greenspace, recreation, and water access
 - Community fabric and the arts
 - Landscaping and spaciousness
 - Emergency services
- **OUR ECONOMY – Economic Health and Vitality**
 - Health care
 - Businesses
 - Airport
- **OUR GOVERNANCE – High performing government**
 - Engaged and collaborative with local and regional partners
 - Transparency
 - Ethics
 - Infrastructure sensitive to the look and feel of Naples

This report consists of three main sections:

1. **Policy Review Findings** – This section highlights the overarching concepts that resonate as most important and recurring from the policy review. These concepts will drive the Plan Update, and proposed policy changes will be reviewed against these concepts for alignment throughout the Plan Update process.
2. **Summary of Policy Recommendations by Vision Themes** – This section is organized according to the Vision Element and provides more specific ideas for implementing the Vision themes through updates to goals, objectives and policies of the Plan.
3. **Vision Validation** – While conducting the policy review and identifying concepts for implementing the Vision throughout the Plan, some topics resonated as opportunities to engage with the community to validate community priorities so that the ultimate policy updates are crafted according to the community intent. This section of the report includes suggested public engagement topics for community discussion anticipated in the Fall of 2025.

POLICY REVIEW FINDINGS

The policy review revealed the following key overarching concepts that resonate as most important and recurring.

1. **Integrate Resilience** – The City has completed a Critical Assets and Facilities Vulnerability Assessment that identifies assets and models various flood scenarios showing how sensitive various assets are to different modes of flood risk. The City has also completed a Critical Assets and Facilities Adaptation Plan that helps prioritize actions and strategies to address prioritized assets at risk. These are the best sources of data to indicate actions the City should take to become a more resilient community. With these data sources and recommended strategies, the City has an opportunity to implement these recommendations through existing policy frameworks such as the Comprehensive Plan and Code. Given the City’s commitment to becoming a more resilient community, a holistic approach to integrate the outcomes of these efforts should be considered.

Integrating resilience principles consistently across various elements of the Comprehensive Plan is a primary directive for this Comprehensive Plan Update. Resilience is the ability to anticipate, prepare for and respond to acute shocks, disruptions and hazardous events or longer-term, chronic stressors related to or exacerbated by weather conditions. Improving environmental resilience involves assessing how weather conditions will create new, or alter current, weather-related risks, and taking steps to better cope with these risks. Resilience includes both adaptation and mitigation strategies.

Incorporating resilience into all Elements of the Plan will be important to ensure a comprehensive approach to climate resilience. This effort will include integration of non-physical strategies from the Adaptation Plan, review of the physical project recommendations to ensure there are no constraints to their implementation, and review of key areas of flood risk to determine the type of flooding impacting those areas as well as policy initiatives that can help facilitate adaptation responses within them. Specific recommendations and identification of key opportunities and constraints related to the integration of resilience throughout the Plan follow in this summary.

2. **Establish Placekeeping** – Naples has a rich history of preserving its small-town character through decades of intentional planning and design work by the City. Recovery efforts post Hurricanes Irma, Ian and Milton have resulted in changes to community character as areas are redeveloped with greater massing and lot coverage, and structures are elevated in response to new FEMA requirements. Exacerbating this is the presence of growth pressures both within the City, at its borders, and beyond.

This Comprehensive Plan Update can leverage the City’s strong planning foundation and provide additional strategies for addressing emerging issues with a special focus on maintaining community character, guiding the design of redevelopment, and achieving climate resilience. The concept of Placekeeping is a recommended approach for reinforcing the City’s small-town character as these changes occur.

“Placekeeping is the process of preserving the culture, history, ecological landscape, and stories of a place while creating spaces that will meet the

needs of the community for years to come. It incorporates the cultural memories that make up the community's social fabric into the built environment. As a counter to Placemaking, it isn't about creating new spaces, it's about embracing what has always been there.”¹

The City could establish Placekeeping efforts by documenting and celebrating the City's characteristic public spaces, cultural features, iconic places, and landmarks. One idea is a map of iconic community structures and places that are important contributors to the City's identity, historic and new alike. Another is to facilitate community engagement for the design of public spaces to ensure Placekeeping principles are achieved through public improvements. This can also be achieved through the refinement of development standards or design guidelines to make sure physical characteristics and qualities of treasured places in the City are carried forward in the designs of new developments. Citywide preservation and recognition programs can be considered to support placekeeping efforts. Potential areas could include but are not limited to the Pier, Baker Park, Naples Design District, Historical Palm Cottage, Lowdermilk Beach, Fifth Avenue South area, and Third Avenue South. In coordination with the “Green Jewel” concept below, the continued implementation of policies to preserve large canopy trees and heritage tree protection also supports Placekeeping principles.

3. **Infuse Character into Growth Policy** – The experience of a space is more than the use that occupies it. The surrounding context and pattern of development, scale of development, architectural program and building design, and integration of natural and built features are core components that make different parts of Naples unique and distinctive. Policies may be updated to include guidance for public investments in rights-of-way or on public lands that reinforce community character. Examples may include bicycle and pedestrian infrastructure to support the walking and biking experience of Naples' neighborhoods. Other ideas may include enhancing open space, strengthening heritage tree protection or increasing tree plantings, and landscaping requirements to maintain the natural environment character as projects are redeveloped.
4. **Implement the “Green Jewel” Concept** – Naples has already established the objective of being recognized as the “Green Jewel” community in Southwest Florida. The Plan Update could support efforts to proactively implement this concept with additional strategies to enhance the network of environmentally sensitive land and parks. More opportunities to implement the “Green Jewel” concept will be derived from the Naples *Urban Forest Green Print* (2024). The “Green Jewel” concept can be further integrated with the City's priority on resilience by highlighting opportunities for nature-based solutions with resilience co-benefits. Supporting the urban tree canopy reduces runoff, combats the urban heat island effect, enhances walkability and outdoor activities, softens noise pollution, and creates engaging outdoor spaces with beneficial ecological impacts. Promoting green stormwater infrastructure uses natural vegetation to treat stormwater before it is returned to natural waterbodies, providing ecosystem and resilience benefits.

¹ McCoy, E. and Ladner, C. (2025, March 28) *Placekeeping: Setting a New Precedent for City Planners*. Planetizen. <https://www.planetizen.com/features/134652-placekeeping-setting-new-precedent-city-planners>

To this end, the Comprehensive Plan should align with strategies included within the 2024 *Critical Assets and Facilities Adaptation Plan*. Comprehensive shoreline approaches that include vegetation (in addition to seawalls or riprap), floodable parks, low impact development for stormwater retention, and enhancement of tree canopy providing cooling and stormwater benefits are all mechanisms to implement these concepts. Broadly, this could be achieved through policies that contemplate performance measures to guide future public and private green space enhancements, so they increase shade, transition to cool roofs/green roofs, and more specific design standards for green infrastructure and low impact development technologies.

5. **Make Plan More Actionable** – The Comprehensive Plan is a tool that can contribute to government efficiency by effectively organizing information through a user-friendly structure. More can be done to organize the Plan and streamline content to support strategic implementation of the actions identified in the Plan. Specifically, the updated Plan could be organized to distinguish policy guidance from implementation strategies and provide a specific action plan to operationalize efforts. Another strategy to consider is to expand the Conservation Element to capture Conservation, Sustainability and Resilience goals, objectives and policy for both the community and City operations, including infrastructure design and asset management.

SUMMARY OF POLICY REVIEW BY VISION THEMES

This section summarizes the policy review findings organized by the themes of the Vision Element of the Comprehensive Plan, providing more specific ideas for implementing the Vision themes through updates to goals, objectives and policies of the Plan.

OUR PLACE - Preserve Small Town Character and Culture

SCALE OF DEVELOPMENT AND REDEVELOPMENT

1. **Add Objectives for Protecting Community Character through Placekeeping Principles and Design Guidance** – Protecting character through design of the built environment, including the scale of development, is inferred in Comprehensive Plan policies, but not explicitly set out as a Plan objective. Specifically, the Plan should identify character protection as a Future Land Use objective. This objective should be supported by policies and action items that relate to protecting cherished character found in neighborhoods and commercial areas, pedestrian access and experience, protection of natural environment, etc. The Future Land Use Element could also include a new objective related to Placekeeping and establish strategies to protect and celebrate the unique character found in City neighborhoods, iconic places, and public spaces.
2. **Incorporate Character in Future Land Use Category Descriptions** – Design characteristics (spatial distribution, relationship, balance, and intensity/density of land uses) are referenced in the introduction of the Future Land Use Element but could more clearly be addressed in the designation descriptions. There is an opportunity to include building blocks of character in Future Land Use descriptions to provide more specificity for the design character that the community wishes to see. These building blocks could include context for massing, scale, building placement, amenity types, and guidance for open spaces and/or green spaces.
3. **Encourage Innovative Parking Strategies** – In addition to the policies about connecting parking lots on separate lots, policies can be updated to identify innovations in parking and curbside management strategies to be considered for business districts and neighborhoods. Examples of strategies that could be identified for the City, business district entities, or applicants at time of development application to explore include: real-time parking mapping, remote trolley circulators, curb front design solutions, remote parking for long term users, remote staging for vehicles that impede safe passage of rights-of-way, and shared parking to reduce impervious surfaces and incorporate more green spaces on sites. In addition, parking strategies may be tailored by Neighborhood Planning areas to right-size parking ratio requirements based on community character.
4. **Transitional Land Uses for Character Compatibility** – The Plan currently includes Future Land Use Policy 5-3 to establish transitional land use zones to assure compatibility of land uses. This could be expanded to include character compatibility as well and provide clearer guidance for how transitions should be made between uses and between adjacent developments with different intensities, by referencing design standards that address massing, scale, architectural articulation, operational standards, landscape buffering, and setbacks, among others.
5. **Intergovernmental Coordination and Joint Planning to Protect Character** – The City could prioritize implementation of the policy to develop joint planning agreements with Collier County for consistency of land use and design for areas within two miles of City/County line (Intergovernmental Coordination Element Policy 1-6). Related to this, the

City and County have developed Corridor Management Plans for Goodlette Road and Golden Gate Parkway per Intergovernmental Coordination Element Policy 1-10 to improve consistency of land use and character along corridors crossing jurisdictional boundaries. These policies could be furthered by enacting coordinated development review between the City and County as set out in Intergovernmental Coordination Element Policy 1-11. Other areas of interest for interjurisdictional coordination could include US 41/Sandpiper and Davis Boulevard/Tamiami Trail East.

6. **Add Specific Guidance for Green Space** – Increasing green space through appropriate project design is an important policy (Future Land Use Policy 1-6), but more specificity is recommended to link this policy to desired results. Different types of green space can serve different functions (athletic facilities, playgrounds, trails, stormwater, buffering from adjacent land uses, general aesthetic function, thermal heat reduction), so identifying which functions are important for various contexts within Naples is critical. Green space can also be used as important markers of community identity, such as the signature street trees that line City streets. The Plan could amplify the importance of maintaining the signature street tree program and other green space identity markers to be used in new development. Green space policies should be located throughout multiple elements to address the benefits of nature-based solutions, shoreline strategies and flood attenuation in land uses, redevelopment, capital improvements, public facilities, and water resource management. Resilient green spaces and parking—such as, pervious paving materials, or grassed parking applications and green spaces that do not require irrigation and fertilizer—could be encouraged. Finally, the definition of green space should be easily understood, and the difference between green space requirements and lot coverage limitations should be clearly distinguished.
7. **Prepare Studies to Identify Character Elements to Protect** – Housing Policies 3-5 and 3-6 identify actions to study character in Old Naples to determine development standards to protect residential character along with adjustments to the *Code of Ordinances* to address the impact of larger homes on smaller lots. These actions could be more specifically defined and prioritized for implementation in the Plan update.
8. **Aid Private Developers in Achieving City Design Objectives** – The City could consider adding professional design/architectural capacity to the Planning Department that could serve as a type of ombudsman for private project implementation. Through internal coordination and creative problem solving, the focus of the ombudsman would be to achieve the City's design intent at the time of project design and development. Reviews of private projects would apply to the design standards of commercial and multi-family development when submitted for design review, as the City of Naples does not have design standards for single family residences.
9. **Incorporate Alternative Traffic Impact Measures** – Expand Traffic Impact Study requirements to protect the road systems within the community as redevelopment occurs.
10. **Encourage Working Waterfronts** – Working waterfronts are areas of economic activity or industry where people earn a living on or near the sea, such as fishing. Tin City is a historic example of working waterfronts in Naples. The City could consider strategies to support and encourage working waterfronts.

HISTORIC ASSETS

1. **Identify Preservation Priorities for Achieving Placekeeping** – The Plan could identify important historical or cultural sites, structures, and assets, and include strategies

(public and private) for protecting and adapting these places. This could also include protection of heritage trees or preservation of other natural features for historic or cultural value. These efforts should also consider the vulnerability or resilience of those assets to climate risks.

2. **Create Incentives for Historic Preservation** – Housing Policy 5-4 identifies the County and City working together to study potential incentives to “encourage the conservation, maintenance, and rehabilitation of historic structures...” An update to this policy may be warranted to recognize changing climate conditions and resilience efforts as well as adaptation priorities. Consider action items to create performance criteria to guide the redevelopment of these properties to honor historic building characteristics; other strategies may include public-private partnerships.

SAFER STREETS AND TRAFFIC CALMING

1. **Ensure Roadways are Designed with Improved Mobility and Enhanced Safety** – Important public and private services, such as private lawn maintenance vehicles, limit mobility on neighborhood streets. Section 36-104 of the current code lists specific streets in the City where commercial vehicle parking is prohibited (an example is in Port Royal). Public engagement efforts may explore whether this list should be expanded to include other streets.
2. **Implement Mobility Strategies** – Continue to leverage findings and regularly update the *Downtown Naples Mobility & Connectivity Study* (November 2017) and the *Downtown Traffic Study* (2025-26) and prioritize capital projects and operational improvements that improve safety for pedestrians and bicyclists while reducing average network delay for automobiles.
3. **Traffic Calming** – Continue enforcement efforts throughout the area, incorporate more education efforts and if necessary, incorporate infrastructure improvements to support reduced speeds.

ZONING AND BUILDING CODE ENFORCEMENT

1. **Adhere to Adopted Plans and Zoning Code** – Zoning and building code enforcement are guided by the regulatory provisions included in the City’s *Code of Ordinances*, including the *Land Development Code* and the *Florida Building Code*. New policies may identify changes to consider to the Land Development Code that can be implemented through Code enforcement. Another consideration is to incorporate voluntary or incentivized resilience measures in a point-based incentive system. Examples of strategies to achieve certain types of resilience benefits could include voluntary additional freeboard, reduced footprints or elevating homes on piles, and columns or piers to allow for parking under structures. Such strategies would need to be reviewed in the context of other Code provisions such as shoreline protection, elevation through fill, and other site planning characteristics.

OUR NATURE - Environmental Sensitivity

WATER QUALITY

1. **Reduce Threats to Water Quality within Waterbodies** – The City implements many programs and initiatives to address water quality issues through stormwater

management, habitat restoration, watershed protection, and educational strategies. Efforts can be enhanced with innovative approaches embraced by comparable communities. Consider more specificity in policies related to best management practices (example Policy 1-5 in Conservation and Coastal Management Element) or cross reference those listed in Public Facilities and Water Resources Element (PFWRE).

Recognizing the relationship between water quantity and water quality, the City could consider a more detailed and expanded level of service standard for surface water management in Policies 1-10 & 1-11 of Public Facilities and Water Resources Element that incorporates future groundwater conditions attributable to sea level rise and diminished stormwater functionality related to tidal flooding. This may make achieving currently adopted levels of service more difficult thus committing the City to level of service standards that may not even be achievable in certain areas of the City. The City may also want to update the referenced *Stormwater Standards Handbook* (2007) referenced in Public Facilities and Water Resources Element Policy 1-11 given recent updates to state stormwater rules such as Chapter 62-330, F.A.C. Objective 3 in the Public Facilities and Water Resources Element references updating the *Stormwater Master Plan*, but a Policy could be added to the Objective that ensures future updates incorporate data related to current and future flooding conditions to capture the increasing effects of tidal flooding. Under Objective 4 of the Public Facilities and Water Resources Element, a policy could be added requiring more specificity in Policy 4-5 on regulating the listed activities and more broadly throughout the Objective recognizing the increasing effects of tidal flooding on freshwater resources of the City.

RECYCLING AND WATER RECLAMATION PROGRAMS

1. **Improve Recycling and Water Reclamation Efforts** – There are no policies in the current Conservation and Coastal Management Element regarding recycling and water reclamation programs. PFWRE Policy 4-11 could be updated to explore public facilities (other than the golf courses) to utilize reclaimed water, if determined feasible to connect existing systems to the reclaimed water system. There is the potential to explore implementing a recycled goods procurement policy in government offices, if that has not been actualized (PFWRE Policy 5-5).

ENVIRONMENTAL ENHANCEMENT AND MONITORING

1. **Identify Techniques to Protect and Enhance Flora and Fauna** – The City supports the philosophy of planting the “right tree in the right place.” Policies can be updated to align with the Naples Urban Forest Green Print (2024) and support established standards that require a more diverse tree population due to concerns about disease and pest infestation affecting monocultures. This could also standardize the use of the University of Florida Florida-Friendly Landscaping™ to promote sustainable alternatives to conventional landscaping while incorporating both native and non-native tropical vegetation.

STORMWATER MANAGEMENT

1. **Update Mitigation Efforts to Reflect Resilience Strategies** – The 2024 *Critical Assets and Facilities Adaptation Plan* contains recommendations to floodproof stormwater pump stations, consolidate existing coastal stormwater outfalls, and establish a flood

impact monitoring program. Consider adding policies and action items to support these strategies.

Furthermore, the *Multi-Basin Assessment* (2024) evaluated five areas that are susceptible to flooding or having water quality concerns. Separately, the *Basin 4 Stormwater Analysis* (2020) showed several roads within the Aqualane Shores neighborhood do not meet the current standard (5-year, 1-hour storm event). Based on these analyses, City Council approved the consultant, Kimley-Horn & Associates, to prepare the *Project Implementation Plan* to prioritize the projects described in the *Multi-Basin Assessment* and *Basin 4 Stormwater Analysis* to be pursued over the course of a 20-year program. This work was presented to City Council in June 2025. *The Project Implementation Plan* includes improvements to comply with a 25-year, 3-day rain event. This work should assist in a larger conversation about stormwater (rainwater) level of service overall considering current and future tidal flooding (rising water) conditions. Additional strategies could include incorporation of tidal flooding analyses as it impacts current or future level of service delivery.

2. **Update Stormwater Level of Service Standards** – Public Facilities and Water Resources Element policies could more broadly reflect the reality that level of service standards may need to be modified to address evolving flood risk. For example, level of service standards could be updated to add a tailwater condition for surface water management. It is challenging to meet the Element’s Goal of managing assets without that recognition. The City could also consider adding resilience to PFWRE Policy 1-2 relative to providing infrastructure and minimizing adverse environmental effects. Similar to comments above related to water quality, the PFWRE Policy 1-10 establishing levels of service for surface water management may be antiquated and may not reflect current and future flood risk or newly adopted state water quality regulations (and note previous comment to update the Stormwater Standards Handbook from 2007). PFWRE Policy 1-11 should be similarly updated given new South Florida Water Management District permit criteria updates stemming from water quality rule updates statewide. (See also previous comments related to updating the *Stormwater Master Plan* and incorporating assumptions for resilience. See also Future Land Use Element Policy 1-8.5 relative to stormwater management and Objective 2 and supporting policies.)
3. **Update Method of Prioritizing Capital Projects** – Capital Improvement Element policies should be expanded to include specific criteria that drive and prioritize capital improvements such as the condition of facilities and vulnerability/need to adapt them (Example: reflect similar policy language in the Capital Improvements Element as that found in Public Facilities and Water Resources Element Policy 1-1). Such policy language is generally an early policy in a Capital Improvements Element to drive priority decision-making on capital improvements projects. This type of policy (factors for consideration in capital projects) is generally outlined in Objective 5, but the language can be strengthened to capture priorities including adaptation and resilience. An example of where this is important is Capital Improvements Element Policy 6-1 directing projects funded by state or federal assistance away from high hazard areas. This Policy currently contradicts pursuit of grant funding for adaptation projects in precisely those areas to address flood vulnerability and improve resilience. Additionally, Policy 6-2 can be modified to address the fact that the exceptions to directing population growth away

from known or predicted coastal high hazard areas to reflect broader vulnerability to flood risk that is beyond a SLOSH-model driven CHHA designation (inland flood risk occurs as well) and that such exceptions should only be contemplated if they are resilient to flood risk.

DRINKING WATER

1. **Implement the 10-Year Water Supply Facilities Work Plan** – Local governments no longer need to adopt the Water Supply Facilities Work Plan as a sub-element to their Public Facilities Element. To help with streamlining, remove this sub-element from the Comprehensive Plan and add a policy to the Public Facilities and Water Resources Element that adopts by reference the City’s 10-Year Water Supply Facilities Work Plan by AECOM scheduled for completion by September 2025.

BEACH MAINTENANCE AND WATER BODY EROSION

1. **Incorporate Recommendations from the 2024 Critical Assets and Facilities Adaptation Plan** – Add coastal resilience strategies to the Conservation and Parks, Recreation, and Open Space Elements. For instance, Strategy 11 relates to collaboration with the County and US Army Corps of Engineers on beach renourishment and dune revegetation, and Strategy 29 recommends “climate resilience” through shade and splash pads or other water-based recreational alternatives and cool pavement projects as heat refuge solutions. (See also previous comments related to water quality and stormwater management.)

RESILIENCE

1. **Expand Efforts to Implement Resilience in Other Ways** – Numerous Objectives, organizational and policy recommendations regarding resilience were listed above in the water quality and stormwater management themes. As a fundamental matter, the City could view resilience of the community as a new way of doing business and driving decision-making. Given that the City is significantly built out, achieving more protection and resilience for the community can be prioritized in decision making related to updating design considerations for redevelopment, infrastructure adaptation, shoreline policy, etc. The only way to achieve this is by viewing the entire Comprehensive Plan and Code through a resilience lens looking for opportunities to enhance it and removing obstacles to achieving it. For instance, the previously provided example regarding limiting funding for infrastructure in coastal high hazard areas could act as an impediment to implementing adaptation projects. Additionally, policy language could prioritize more innovative shoreline response over seawalls in appropriate water bodies (wider, open water facing, etc.).
2. **Update Future Land Use Element to address Flood Risk** – In the Future Land Use Element, the City could enhance its guiding principles in the Introduction by adding that future growth and redevelopment should also be resilient to changing environmental conditions by addressing current and future flood risk. Most of the element includes the nuts and bolts of any Future Land Use Element. The Element may benefit from a reorganization moving up the Generalized Land Use Section to the beginning of the

Element and adding a new Objective focused on resilience with supporting policies capturing key concepts such as:

- a. Development and redevelopment should be resilient to the risks of current and future flood risk;
- b. Nature-based solutions should be employed as resilience strategies where beneficial and appropriate over traditional construction materials and methods;
- c. Adaptation priorities and needs should be factored into infrastructure and capital project analysis; and
- d. Other broad policy recommendations already described.

3. **Update Transportation Element to Address Infrastructure Vulnerability** – Updating and expanding the Transportation Element is a good opportunity for the City to manage the realities of adaptation. The current element largely focuses on capacity, aesthetics, and congestion, but it could be enhanced with resilience-related policy development. The City could add resilience to the Transportation Goal for delivery of a transportation system. One mechanism to do this is to include policy language that adds flood resilience to transportation design standards beyond capacity-based levels of service or the currently adopted stormwater level of service for certain types of roads that only considers stormwater (not tidal flooding). It is important to acknowledge also what other communities are starting to understand, that there may be limits to the ability to adapt road and companion stormwater systems given the type of tidal flooding that may be occurring. As such, wholesale resilience and adaptation policies related to infrastructure overall, but specifically transportation, need to recognize these potential limitations and provide flexibility for policy-making that may include the decision not to adapt or abandon (retreat). As tidal flooding makes road maintenance more difficult and costly, considerations related to the fiscal implications of adapting transportation facilities should also be considered. For instance, Objective 3 in the Transportation Element states “Improve the condition and appearance of the City’s streets...” This Objective drives a certain type of decision to make the improvement where it may not be preferable or fiscally responsible to do so in the case that a roadway is perpetually inundated by tidal flooding.
4. **Update Housing Element to Recognize the Adaptation Plan** – Similar comments can be made relative to the Housing Element where there is an opportunity to enhance the element by incorporating resilience concepts. For example, maintain policies that identify how stormwater improvements may be implemented to reduce flood vulnerability of neighborhoods. Strategies to mitigate heat, such as requirements for light colored roofs, are another example.
5. **Update the Coastal Management Element to Recognize the Community Rating System** – Additionally, in the current Conservation and Coastal Management Element, there is no mention of FEMA’s Community Rating System. The City is currently a class 5 and is developing a watershed management plan (which examines the City’s stormwater system under required flooding conditions) that may help lead to an improvement in the City’s class rating. Participation in the program should integrate climate response, emergency management, and community education.

The City completed a *Vulnerability Assessment and Adaptation Plan* in 2024. The outcomes of these documents provide an opportunity for integration into the Comprehensive Plan as well. Key concepts that can be integrated:

- a. Adoption of design standards that factor in tidal flooding (such as transportation, parks, and other relevant facilities).
- b. Reviewing vulnerable critical assets to prioritize adaptation measures (capital projects) such as the most vulnerable assets contemplated to be impacted in the nearest timeframes. (See Appendix D for individual asset listing in the *Vulnerability Assessment*.)
- c. Integration of the 47 ranked adaptation strategies from the Adaptation Plan where appropriate. (Note 60% of the strategies are non-physical and may require some level of policy implementation.)
- d. Use the Adaptation Focus Areas from the Adaptation Plan to drive priorities for capital project development or additional policy making.
- e. Determine if specific asset strategies from the Adaptation Plan require design standard changes for implementation.
- f. Expand Strategy 17 of the Adaptation Plan to additionally focus on shorelines as well as seawalls.

OUR EXPERIENCE - Extraordinary Quality of Life for Residents

SAFETY

1. **Continue Prioritizing Safety** – Naples prioritizes the safety of its community through funding of capital improvements and operational budgets to ensure police and fire services are provided at the highest standards. Any need for updates to policy or action items will be determined based on stakeholder and public feedback.
2. **Safety in Public Spaces** – The City can consider safety strategies for public spaces, such as Crime Prevention Through Environmental Design (CPTED), in both the Plan and subsequent code updates. CPTED is a multi-disciplinary approach to deterring crime by influencing the design and management of the built environment. CPTED also aims to foster a sense of community and social interaction, which can further enhance safety and security. It seeks to reduce criminal opportunities and the fear of crime by making spaces less attractive to offenders and fostering a sense of safety and community. This can be achieved through clear boundaries, landscaping, and signage that define private and public areas. CPTED strategies can also include installing lighting and emergency phones to improve nighttime safety, which could be used for facilities such as Baker Park and City-owned parking garages. Other examples could include security protocols for City buildings and public spaces (such as the ability to close and secure parks or piers after operating hours and supporting the installation of technology for security and safety). Finally, the City can consider an evaluation of supportive measures for public safety during special events. Security barriers, such as bollards or vehicle blocking mechanisms, are options to improve safety during large-scale public events at parks. Other examples of CPTED in practice can include:
 - a. **Improved Lighting/Communication/Cameras:** Well-placed and maintained lighting can increase visibility in parking lots, walkways, and other public areas; along with cameras and emergency response phones.

- b. **Landscaping:** Strategic landscaping can enhance sightlines, create natural barriers, and guide pedestrian traffic (i.e. bollards and other vehicle barriers).
- c. **Building Design:** Building design can incorporate features like windows that allow for natural surveillance and clear sight-lines from inside to outside.
- d. **Access Control:** Fences, gates, public access ways/doors and other barriers can be used to manage access to specific areas and deter unauthorized entry.

CLEANLINESS

1. **Maintain a Clean and Manicured Community** – The City maintains high quality standards for aesthetics in the public and private realms through application of policies, design standards, code enforcement, and maintenance programs. Updates to the Plan policies or action items to address this service area may include educational initiatives to encourage residents and visitors to maintain cleanliness of public spaces and waterways. Further policy or action items will be determined based on public feedback on this service area. The incorporation of resilience in this area could include encouraging *Florida-Friendly Landscaping™* that incorporates a diversity of drought-tolerant native and non-native tropical vegetation on public and private property. The *Urban Forest Report* supports this diversity to prevent disease and pest infestation and avoid dominance and vulnerabilities of monocultures.
2. **Celebrate Community Partners that Help Maintain Visual Quality** – The City could establish a recognition program for the most attractive neighborhood or neighborhood street, businesses that help contribute to the beauty of the City, or other contributions that enhance the visual quality of the City.
3. **Support Community “Greening” Efforts at Local Events** – An objective could be added to the Parks, Recreation, and Open Space Element to support sustainable practices at events, such as onsite recycling and composting receptacles.

AFFORDABILITY

1. **Coordinate with Collier County on Affordable Housing Opportunities** – A review of development activity within Collier County shows many recently approved projects with significant increases in density just outside Naples' boundaries. The Intergovernmental Coordination Element Policies 1-6 and 1-11 support the development of planning agreements for staff collaboration on review of development proposals impacting, but outside of, their respective jurisdictions. Housing Policy 1-1 offers the opportunity for Collier County to pursue interlocal agreements with the City of Naples, and the City and County approved the *SHIP Local Housing Assistance Plan* in 2025 to address the housing needs of low-income households and expanding production and preservation of affordable housing. The City/County could also consider requiring affordability as part of new projects that propose to exceed base density.
2. **Coordinate with Developers on Live Local Act to Promote Affordable Housing** – New affordable housing developments may result from the Live Local Act on commercial or mixed use zoned land. The City should be prepared to provide additional educational materials to developers on this administratively approved process to help inform them about this option and promote affordable housing development opportunities.

COMFORT AND PEACEFULNESS

1. **Airport Noise Abatement** – Future Land Use Policy 7-3 identifies an action that protects the quality of life by “implementing and enforcing appropriate and legal noise abatement

procedures through the work of the Naples Airport Authority.” This action should be continued. Any need for updates to policy or action items will be determined based on stakeholder and public feedback, as well as state-level comprehensive plan requirements.

2. **Expand Blue Zone Community® Initiatives** – In collaboration with health care organizations and other industry partners, seek to implement additional initiatives that aim to improve the overall well-being of the community.

GREENSPACE, RECREATION, AND WATER ACCESS

1. **Improve Access and Connections to Nature** – Adopt policies to create the connected “Green Jewel” infrastructure through accessible parks, recreational facilities, urban forests, nature preserves, beaches, and community open spaces (Parks, Recreation, and Open Space Objective 1). This could include both public and private investment in green space, resilience/adaptation, and water access, including private investments that result in public access. This “Green Jewel” infrastructure could then be documented in a map of the “Green Jewel” network to expand education of and opportunities for enjoyment of the outdoors.
2. **Specify Objectives for Green Space** – Future Land Use Element Policy 1-6 that promotes an increase in the amount of green space through appropriate project design stops short of definition or standards. Different types of green space can serve different functions (athletic facilities, playgrounds, trails, stormwater, buffering from adjacent land uses, general aesthetic function, thermal heat reduction, resilience), so additional guidance for which functions are important for various contexts within Naples is critical. (See similar finding in Scale of Development and Redevelopment themes above.)
3. **Recreation Level of Service** – The existing Plan establishes levels of service as the metric for determining if new facilities need to be created. Using the current method of establishing parks LOS standards by recreational facilities per capita does not help the City achieve its objectives to increase green space. Naples should consider other best practices to measure achievement of recreational facility goals which further the City’s Vision, as a more accurate representation of the values and needs of City residents. In addition, the City is currently in the process of updating its *Parks and Recreation Master Plan*. Careful consideration should be given to updating the level of service standards for parks, recreation, and open space. Options to consider:
 - a. Park access (% of residents within 10 min or ½-mile walk of park or trail)
 - b. Park quality (mix and location of park amenities)
 - c. Park availability (measure of park capacity, use and demand)
 - d. Trail connectivity (total miles versus benchmarked standards or linear miles per 1,000 residents)

COMMUNITY FABRIC AND THE ARTS

1. **The Arts** – Neither visual nor performing arts are mentioned in the existing plan. The city’s Public Arts program could be acknowledged through discussion of programming in the Parks, Recreation and Open Space Element and of community character in the Future Land Use Element. Developing strategies to incorporate public art could reinforce the City’s cultural identity and support further placekeeping strategies.

2. **Address Impacts of Visitors at City Events** – The City could consider different approaches for addressing impacts of non-city residents attending City events. Potential solutions could include:
 - a. Temporary event parking plans
 - b. Temporary signage or traffic officers to divert drivers away from parking on neighborhood streets
 - c. Promote visitors to use active modes of travel by providing bike racks and walking maps
 - d. Increase waste management services during and after events
 - e. Provide a hotline for complaints during the event
 - f. Limit the number or size of high-impact events per year
 - g. Charge event organizers fees to pay for public service costs
 - h. Survey residents after an event to identify lessons learned and enact policies and efforts to address these impacts

LANDSCAPING AND SPACIOUSNESS

1. **Balance Resilience and Character Protection** – The Plan could clarify in Conservation and Coastal Management Element Policy 4-9 where Low-Impact Development strategies should be prioritized. There is an opportunity to balance resilience objectives with character protection objectives in this strategy.
2. **Increase Tree Canopy Protection** – The City has strong guidance and programs in place regarding canopy trees. The City of Naples Urban Forest Green Print 2024 includes over 20,000 trees and palms lining public streets and in medians and parks. Almost 30% of the city is currently covered by tree canopy including both public and private trees. The City's Tree Fill-In program provides annual funding for the planting of canopy trees and palms along identified rights-of-way and vacant locations to replace trees that have been removed or died. Chapter 38 of the *Code of Ordinances* establishes regulations for the protection and management of city-owned trees and palms within rights-of-way, parks, medians, and other public lands. Furthermore, the Naples Urban Forest Green Print 2024 provides an overview of the care, preservation, pruning, planting, removal, or disposition of City trees and palms. Explore ways to recognize this in the Comprehensive Plan and introduce policies to increase the tree canopy through innovative strategies and best management practices. In addition, Article III of Chapter 50 (Development and Design Standards) of the Code of Ordinances needs to be updated and modernized; these updates need to include requiring green space, providing information about planting types, and other landscaping regulations to further these objectives.

EMERGENCY SERVICES

1. **Ensure the Community is Served by the Closest Fire Service Provider** – The City regularly monitors response times and has achieved the Insurance Services Organization (ISO) rating of Class 1, the highest national benchmark. The 5-Year Capital Improvement Program is updated to address any needs that arise due to facility or equipment deficiencies. The City adopted a Comprehensive Emergency Management Plan in 2017 and maintains Mutual Aid Agreements and Memorandums of Understanding with various vendors for assistance during emergencies. In addition, the Public and Semi-Public Institutional Future Land Use Map designation has been established for governmental buildings such as

emergency services facilities. See comment above in the Resilience theme related to participation and coordination with FEMA's Community Rating System program.

OUR ECONOMY - Economic Health and Vitality

HEALTH CARE

1. **Maintain and Enhance the Medical Business Community** – A robust and ever evolving medical industry is established within the City. Consider designating a "Health Care" Overlay designation to recognize and facilitate continuity of this important business community and consider collaborating with stakeholders to develop standards that accommodate the medical business-related community in context with the City's character objectives.

BUSINESSES

1. **Support Local Businesses that Enhance the Small-Town Character** – The City has distinct shopping districts and future land use designations that accommodate a variety of retail based on location: Commercial-Business Park, Commercial-Highway, Commercial-Limited, and Waterfront-Mixed Use Future Land Use designations. Similar to the approach for maintaining and enhancing the medical industry, if desired the plan may be updated to consider collaborating with stakeholders to develop standards that accommodate local business retention and diversity of commercial uses to modernize in context with the City's character objectives.

AIRPORT

1. **Recognize the Importance of the Airport while Balancing its Impacts** – The Airport is identified on the Future Land Use Map with a specialized Future Land Use category and noise contours. The Naples Airport Authority is established to manage operations of the airport, and the City Council and Authority coordinate with one another. Compliance with Chapter 333 of Florida Statutes is accomplished through the adoption of Airport Overlay District in the Land Development Code. Any need for updates to policy or action items will be determined based on stakeholder and public feedback.

OUR GOVERNANCE - High Performing Government

ENGAGED AND COLLABORATIVE WITH LOCAL AND REGIONAL PARTNERS

1. **Intergovernmental Coordination and Joint Planning to Protect Character** – Policies and action items could be updated to prioritize the development of joint planning agreements with Collier County for consistency of land use and design for areas within two miles of the City/County line (Intergovernmental Coordination Element Policy 1-6). This could be furthered by establishing coordinated development review protocols between the City and County as set out in Intergovernmental Coordination Element Policy 1-11.

TRANSPARENCY

1. **Maintain Strong Connections with Residents** – The City operates public outreach, public relations, and public information on many platforms, managed by staff within the City Manager's office. The City also conducts Level of Service reporting to

demonstrate the standards that apply to public facilities and their operational performance on an annual basis. Any need for updates to policy or action items will be determined based on public feedback on opportunities for strengthening transparency and connection with residents.

ETHICS

1. **Be Fiscally Responsible and Prioritize Residents in Every Decision** – The City has an Independent Ethics Commission. In accordance with State Statutes, the City has adopted a Private Property Rights Element that ensures open and accountable decision-making regarding property rights, promoting fair treatment and preventing corruption. The City embraces fiscal responsibility in its decision-making and prioritizes residents' needs. Any need for updates to policy or action items will be determined based on public feedback on opportunities for strengthening fiscal responsibility and prioritization of residents.

INFRASTRUCTURE SENSITIVE TO THE LOOK AND FEEL OF NAPLES

1. **Establish Role of Road Design in Defining Character** – Consider reinforcing street tree requirements and evaluating where neighborhood or area-specific mobility plans, or parking and curb front management programs, may be applied. See also previous comments under the Resilience theme related to enhancing resilience efforts in the Transportation Element.
2. **Enhance Landscape Buffers that Support the “Green Jewel” Concept** – Evaluate circumstances and locations of high-to-low intensity land use transitions that warrant expanding the requirements for landscape buffers to require linear parks to implement Future Land Use Element Policy 5-3 (see additional comments above regarding the Scale of Development and Redevelopment theme).
3. **Maintain Comfortable Levels of Vehicle Parking** – Policies can be updated to identify innovations in parking and curbside management strategies to be evaluated for business districts and neighborhoods. Examples include managed/paid parking, encouraging grassed parking areas within low turnover areas, real-time parking mapping, remote trolley circulators, curb front design solutions, remote parking for long term users, remote staging for vehicles via operational agreements or similar mechanisms to accommodate work trucks and other construction/maintenance vehicles in a manner that does not impede safety within rights-of-way.
4. **Promote Multimodal Alternatives to Control Congestion** – The City implements transportation concurrency. Levels of service are based on ratios of volume to capacity and do not support multimodal solutions to control congestion. When roadway segments fail to meet minimum LOS standards, the typical solution is to expand the right-of-way; however, this is not always possible in an urban setting due to limited space and existing infrastructure. It may also be counter to community character objectives for an area. Many communities have adopted mobility plans and funding systems that focus on safely and conveniently moving people using various modes. Continue to leverage findings and regularly update *the Downtown Naples Mobility & Connectivity Study* (November 2017) and the *Downtown Traffic Study* (2025) and prioritize capital projects and operational improvements that improve safety for pedestrians and bicyclists while reducing average network delay for automobiles. In addition, the City should reevaluate the thresholds for requiring a

Comprehensive Plan Evaluation

SUMMARY OF POLICY REVIEW BY VISION THEMES

development project to provide a traffic impact analysis based on criteria other than lot size.

VISION VALIDATION

It is important to validate the Vision during the planning process to ensure the recommendations drafted for the Comprehensive Plan Update represent community priorities. The following Vision themes warrant community engagement to better understand the topic in context for tailoring meaningful policy.

- **Identify, Preserve, and Accentuate Community Character** – The City of Naples is known for its unique community character and has expressed the need to preserve existing features while ensuring new development embraces and strengthens these traditions. Feedback from residents and business owners on the spaces, locations, and structures that best represent their neighborhoods will aid in developing policies that recognize and reinforce the features of the community that are considered special.
- **Expanding the “Green Jewel” Concept** – The purpose of this Vision theme is to establish Naples as the “Green Jewel of Southwest Florida.” With nearly 30% of its jurisdiction covered by tree canopy, including over 20,000 trees and palms in public areas alone, the City has been very successful in “greening” the community. This is supported through the adopted 2024 Naples Green Print, Tree Fill-In Program, Urban Forest Program, Naples Tree Walk, and Tree Protection Ordinance. Green space can mean various things to different people, whether it is street trees, athletic fields, passive parks, stormwater areas, conservation lands, resilient infrastructure, or lush landscaping. Feedback from residents and business owners on how they perceive the “Green Jewel” concept and what they consider as contributing to this goal will help ensure policy updates align with community intentions.
- **Integrating Resilience** – To resolve the most relevant recommendations from the City’s 2024 *Critical Assets and Facilities Adaptation Plan* and best management practices for resilience, the community’s feedback will help define top priorities and concerns of the community, so that the Plan Update addresses resilience in a manner that reflects what matters most to the community. This includes leveraging public engagement conducted during the process to develop the *Critical Assets and Facilities Adaptation Plan*.
- **Increasing Mobility Options** – Florida communities are encouraged to embrace alternative modes of transportation, but established communities may not be equipped with infrastructure or rights-of-way to accommodate these facilities. By asking community members how they travel within the City; if the existing bicycle, pedestrian, and vehicular facilities meet their needs; and how their transportation needs might change in the future, policy updates can better reflect the realities of the City’s community member experiences and expectations for the built environment.
- **Improving Safety** – The City places a high priority on the safety of its constituents, and emergency services are expected to be at the highest standards. Feedback from citizens on their perception of safety within the City and any suggested improvements will aid in determining if policy updates are warranted.
- **Enhancing Cleanliness** – This Vision theme seeks to invest in maintaining a clean and manicured appearance in the community. This is achieved through code enforcement

and implementation of property maintenance standards, but there are additional ways to enhance the aesthetic quality of the community, such as implementing educational initiatives, recognition programs, and promoting greening efforts. Community feedback identifying problem areas and if there is consensus for desired programs to promote the cleanliness of the community will help inform policy updates that align with resident interests.

- **Prioritizing City Residents** – The Vision themes related to Transparency and Ethics in Our Governance affirm the prioritization of residents; City leaders are committed to maintaining strong connections with residents and prioritizing resident needs in all decisions. Community feedback on whether additional communication efforts are desired to inform residents of new projects, initiatives, or government actions would help guide policy updates to implement this Vision theme.
- **Ensuring Airport Compatibility** – The Vision recognizes the importance of the Airport as an economic driver but also places priority on balancing the impacts on the surrounding community, particularly noise impacts. The City regularly coordinates with the Naples Airport Authority on implementation strategies to improve compatibility. If any Plan Updates are to be crafted to address airport compatibility, it would require feedback from community members on their preferences, and what they would like to be emphasized in policies relative to noise impacts and economic considerations.