July 1, 2026 -
October 23, 2026

Naples 2045 Comprehensive Plan

Public Comments on the Extended Review Draft Plan











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No.	Date Sent	Source	Commenter	Comprehensive Plan Element	Synopsis of Comment
1	8/1/2026	Letter	Penny Taylor (Lake Park resident)	FLU	Questioned whether residents were given adequate opportunity and factual context in the Public Engagement Questionnaire to reconsider the value of low-rise development, step-down building heights, setbacks, and neighborhood compatibility in light of post-Hurricane Ian flood elevations and rebuilding requirements. 1) What info was provided to participants about post-Hurricane Ian requirements and how those affect height, scale, setbacks, and compatibility? 2) How are Round 2 Questionnaire responses going to be evaluated based on different development rules in place today?
2	8/1/2026	Letter	Penny Taylor (Lake Park resident)	Intro	Questioned the Draft's use of a 20% seasonal-population increase over permanent population for projections. 1) Why is there such a large difference among these population estimates, and why was 20% selected for the Naples 2045 planning assumption? 2) Whose responsibility is it to determine which population figures and methodology are used — the consultant or City staff — and what data support that decision? 3) Were the most recent population and seasonal-residency figures used during the 2025–2026 review and if not, why not? 4) Where different population estimates or methodologies are used among elements, what supporting data and analysis justify those differences, and how is consistency among the elements ensured under Florida Statute §163.3177(2)?
3	8/1/2026	Letter	Penny Taylor (Lake Park resident)	FLU	Stated that the Future Land Use Element does not appear to forecast the amount or scale of redevelopment through 2045 or compare pre- and post-Hurricane Ian redevelopment intensity, despite Naples being largely built out and redevelopment affecting infrastructure demand. 1) Since Hurricane Ian, there is a perception that redevelopment is occurring at a greater scale or intensity than the development it replaces. Has the City verified this by comparing pre- and post-Hurricane Ian development in terms of square footage, building footprint, height, residential units, hotel rooms or lot coverage? If so, how was that information considered in preparing the Naples 2045 Draft Plan?
4	8/1/2026	Letter	Penny Taylor (Lake Park resident)	H	Questioned whether the Housing Element uses the most recent data, noting reliance on 2019-2023 ACS estimates and unidentified dates for rent, value, owner-cost, affordability, and cost-to-income data after 2020-2024 ACS estimates became available. 1) What are those dates of the housing data used to evaluate rents, housing values, owner costs, affordability and cost-to-income ratios in the Housing Element? 2) The Draft relies principally on the 2019–2023 American Community Survey 5-year estimates. The Census Bureau released the 2020–2024 ACS 5-year estimates on January 29, 2026. Were the 2024 estimates reviewed for the current Draft, and if not, why not?
5	8/1/2026	Letter	Penny Taylor (Lake Park resident)	CCM	Asked which conservation, coastal, flood, hazard-mitigation, and stormwater sources reflect post-Hurricane Ian conditions and how 2045 flooding and stormwater needs were evaluated while the updated Stormwater Master Plan remains incomplete. 1) Which studies, maps, datasets and other supporting materials used for the Conservation and Coastal Management Element incorporate post-Hurricane Ian conditions, and which rely principally on pre-Ian information? 2) Given the extent of flooding and damage caused by Hurricane Ian, if the updated Stormwater Master Plan is still forthcoming, how were current and future flooding and stormwater conditions evaluated for purposes of the 2045 planning horizon?
6	8/1/2026	Letter	Penny Taylor (Lake Park resident)	R	Asked whether the 2023 Vulnerability Assessment and 2024 Adaptation Plan fully incorporate conditions observed during and after Hurricane Ian and whether significant 2025-2026 findings should be added to the Plan.
7	8/1/2026	Letter	Penny Taylor (Lake Park resident)	PFWR	Noted that the Water Supply Facilities Work Plan relies on older population, supply, and demand information; that water/sewer and stormwater master plans remain pending; and that the solid-waste section appears to contain outdated landfill information. 1) What current 2025–2026 data and analysis were used to update or validate the older population, water-demand and water-supply information contained in the Water Supply Facilities Work Plan? 2) If the updated Water/Sewer and Stormwater Master Plans will not be completed until 2027, how were the City's public-facility, water, wastewater and stormwater needs evaluated for the 2045 planning horizon? 3) What current solid-waste data replaced or validated that information?
8	8/1/2026	Letter	Penny Taylor (Lake Park resident)	T	Requested the dates and current versions of the principal transportation plans, corridor studies, traffic counts, level-of-service data, and seasonal/peak-hour analyses supporting the Transportation Element.
9	8/1/2026	Letter	Penny Taylor (Lake Park resident)	PROS	Questioned the data used to project parks and recreation needs through 2045 while the 2026 Parks and Recreation Master Plan and needs survey were unfinished and the Draft still referenced a 2015 needs assessment. 1) If the 2026 Parks and Recreation Master Plan and its community needs survey were not complete when the Naples 2045 Draft was prepared, what current data were used to determine the City's parks and recreation needs through 2045? 2) Once the 2026 Parks and Recreation Master Plan is completed, will its findings — including any updated needs assessment and changes to level-of-service standards — be incorporated into the Naples 2045 Comprehensive Plan before adoption?
10	8/1/2026	Letter	Penny Taylor (Lake Park resident)	IC	Requested dates and current status for the interlocal agreements, coordinated studies, shared datasets, and government plans supporting cross-jurisdictional land use, infrastructure, services, and flood-risk planning through 2045. 1) What are the dates and current status of the principal interlocal agreements, coordinated studies, shared data and governmental plans relied upon to support the Intergovernmental Coordination Element, and were the most current versions available during the 2025–2026 review used? 2) What current intergovernmental data and analysis were used to evaluate cross-jurisdictional land-use, infrastructure, public-service and flood-risk issues through the 2045 planning horizon?

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11	8/1/2026	Letter	Penny Taylor (Lake Park resident)	N/A	Asked how Hurricane Ian affected capital assumptions and priorities, and whether findings from the 2026-2027 stormwater, watershed, water/sewer, and parks master plans can be incorporated before transmittal or adoption. 1) How did what the City learned from Hurricane Ian affect the assumptions, priorities or projects being developed in the City's major infrastructure master plans? 2) Given that several of the master plans (Water/Sewer Master Plan, Parks and Recreation) are expected to be completed in 2026 or early 2027, can their findings be incorporated into the Naples 2045 Comprehensive Plan before the Plan is transmitted or adopted?
12	8/1/2026	Letter	Penny Taylor (Lake Park resident)	N/A	Recommended completing the major pending studies—especially public facilities/water resources, conservation/coastal management, parks, and capital improvements—and incorporating their findings before moving the Comprehensive Plan forward for adoption.
13	9/29/2026	Email	Penny Taylor	N/A	Requested an estimate of the additional consultant cost and schedule implications of pausing the Comprehensive Plan process until the Water/Sewer and Stormwater Master Plans are completed and reviewed in early 2027.
14	8/13/2026 & 9/5/2026	Email	James & Joan DeVore (Moorings residents)	FLU	Supported Florida-Friendly Landscaping and requested that Policy FLU 4.1 clearly govern the street-tree policies, directing the City Arborist to migrate unsuitable street trees (debris, require excessive irrigation, not storm resistant) over time under the principle 'Right Tree, Right Place, Florida Friendly.' Suggests strengthening FLU-4.3.7
15	8/13/2026 & 9/5/2026	Email	James & Joan DeVore (Moorings residents)	FLU	Provided warning not to allow Policy FLU 6.5 and Action FLU-6.5.1 to dictate architectural styles for single-family low-density housing, arguing that styles change over time and the City should avoid 'style police.'
16	8/13/2026 & 9/5/2026	Email	James & Joan DeVore (Moorings residents)	T	Requested that Policy T-1.5 clearly state that rights-of-way regulations be brought to date with current safety standards despite grandfathered conditions, especially in older high-use coastal areas, to support safe walking and bicycling.
17	8/13/2026	Email	Barbara J. Rudd (Naples Diamond Realty)	FLU	Expressed concern over the loss of traditional Naples charm and recommended establishing clear building guidelines that require traditional awnings, appropriate shutters, and architectural details, while explicitly prohibiting glass or Plexiglass railings. Stated that Naples should not imitate Miami style.
18	8/13/2026	Email	Barbara J. Rudd (Naples Diamond Realty)	FLU	Noted a need for more public art.
19	8/13/2026	Email	Barbara J. Rudd (Naples Diamond Realty)	PROS	Highlighted Cambier Park as a key focal point ("Central Park") for Naples, but expressed concern that it looks neglected and in terrible shape, emphasizing that parks/public spaces are vital to community character and deserve higher maintenance standards.
20	10/6/2026	Email	Barbara J. Rudd (Naples Diamond Realty)	FLU	Expressed concern that repetitive Miami-style condominium designs, glass railings, out-of-scale buildings and repeated developer branding are eroding downtown Naples' traditional charm, architectural detail and distinct visual identity. Also noted the loss of independent shops and the everyday character that once made downtown feel unique.
21	10/6/2026	Email	Barbara J. Rudd (Naples Diamond Realty)	FLU & PROS	Stated that downtown has less public art and fewer unique touches; that beautification appears concentrated on Fifth Avenue South while other areas and rotary gateways look neglected; and that potholes and poor street conditions detract from safety, appearance and the overall downtown experience.
22	10/6/2026	Email	Barbara J. Rudd (Naples Diamond Realty)	PROS	Expressed concern about delays, open work areas, cleanliness and maintenance at Cambier Park .
23	8/14/2026	Website Comment Form	Bob Bernardi (Old Naples resident)	N/A	Downtown Old Naples is excessively loud from loud car/truck/motorcycle mufflers, speeding bursts, cars left in 1st gear so engines rev loudly. There's little enforcement or attention paid to the issue. Hardly 'small town charm and peacefulness'.
24	8/17/2026	Email	Rene Lewin (Miracle Mile)	N/A	Noted that nearly 500 Miracle Mile residents participated in a neighborhood survey with questions similar to the Comprehensive Plan process and asked whether the planning team used the survey results.
25	8/18/2026	Email	Gregory B. Myers	T & FLUM	Asserted that Gulf Street is an existing, unvacated 60-foot public right-of-way integral to the historic Plan of Naples street and waterfront-access network and should be expressly recognized in the Plan text and depicted on applicable maps. Wants the Plan to recognize Gulf Street and depict the corridor on the FLUM and map series. Recommends adding: "Gulf Street. The City recognizes Gulf Street, as depicted on the Plan of Naples recorded in Plat Book 1, Page 8, as an existing sixty-foot public right-of-way extending north-south along the Gulf of Mexico and forming part of the historic Plan-of-Naples street and waterfront-access network. Gulf Street shall be depicted on the applicable Comprehensive Plan maps. The physical presence of sand, dunes, vegetation, or beach conditions within the Gulf Street corridor shall not be construed to vacate, extinguish, abandon, reclassify, or diminish the legal status of Gulf Street or any existing public or private right arising from the Plan of Naples."
26	8/18/2026	Email	Gregory B. Myers	CCM	Concerned that the Draft treats 'beach' as a single legal category and should distinguish State-owned land seaward of the Erosion Control Line, public rights-of-way such as Gulf Street, beach approaches, easements, private rights, and coastal regulatory lines.
27	8/18/2026	Email	Gregory B. Myers	CCM	Stated that shoreline policies must recognize recorded public and private property interests, including easements and dedications, and should not allow physical labels such as beach, dune, or shoreline to obscure the legal status of those interests. Recommends adding: "Beach and Shoreline Legal Framework. The City's Gulf shoreline consists of lands subject to differing fee ownership, public-use rights, private property interests, dedications, easements, rights-of-way, and governmental jurisdictions. The Comprehensive Plan shall distinguish those interests where material to land use, transportation, coastal management, public access, or development review. The physical designation of land as 'beach,' 'dune,' or 'shoreline' shall not alter or obscure the legal status of an underlying street, right-of-way, easement, dedication, or other property interest."

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28	8/18/2026	Email	Gregory B. Myers	IC	Requested identification of the respective ownership, regulatory, permitting, maintenance, public-access protection, and enforcement responsibilities of the State, FDEP, Collier County, and City within the shoreline area. Recommends adding: "Intergovernmental Responsibilities. The City shall identify the respective ownership, regulatory, permitting, maintenance, public-access protection, and enforcement responsibilities of the State of Florida, Florida Department of Environmental Protection, Collier County, and the City for lands within the City's beach and shoreline area."
29	9/4/2026	Email	Callhan Soldavini (Lake Park resident)	PROS	Supported preserving diverse community special events and requested a Comprehensive Plan commitment to reasonable opportunities for nonprofit, charitable, cultural, and community organizations, noting that rising permit costs and barriers are pushing events outside the City.
30	9/30/2026	Email	HOA Coalition	V	Recommends updating the Vision Statement to the following: Naples is a vibrant and sophisticated coastal community distinguished by its exceptional quality of life, natural beauty and beaches, safety and security, distinct neighborhoods, healthy economy, small-town charm, and unique sense of place. As Naples continues to evolve and renew, it will protect these defining qualities while embracing thoughtful change, respecting individual property rights, and preparing for the needs of future generations. Naples will continue to strengthen community resiliency, protect and enhance its natural resources, and modernize essential infrastructure. Through responsible stewardship and collaboration with local, state, and regional partners, Naples will embrace opportunities to improve mobility, expand workforce housing, adapt to a changing coastal environment, and remain a resilient, thriving community for generations to come.
31	9/30/2026	Email	HOA Coalition	Appendix	Recommends updating the following definitions as follows: GREEN JEWEL The Green Jewel is a guiding community vision for Naples to preserve and enhance its distinctive green character as the City evolves. It recognizes the City's trees, landscaping, parks, open spaces, natural areas, waterways, and other environmental resources as elements of Naples' identity, sense of place, quality of life, and long-term resilience. CHARACTER A city's character refers to distinct look and feel of an area shaped by the following: its physical features, land use, architecture, streetscapes, natural elements, neighborhoods, lifestyle, buildings, community activities that create a unique sense of place. SMALL-TOWN CHARM Naples' Small-town charm comes from the welcoming, safe, walkable residential neighborhoods and shopping districts enhancing the quality of life through a resilient, environmentally balanced approach. The term recognizes these valued qualities while allowing Naples to thoughtfully grow, continuously renew, and evolve in ways that enhance its character and quality of life.
32	10/23/2026	Letter	HOA Coalition	V & Appendix	Recommended a forward-looking Vision balancing preservation with responsible renewal, resilience, infrastructure, mobility, workforce housing and property rights, together with clearer definitions of Green Jewel, character and small-town charm.
33	10/23/2026	Letter	HOA Coalition	FLU & IC	Requested stronger neighborhood-level planning and ongoing coordination with Collier County, FDOT, SFWMD and other partners for land use, transportation, water, beaches, emergency planning, housing and infrastructure.
34	10/23/2026	Letter	HOA Coalition	R, PFWR, T, PROS & CIE	Recommended actionable resilience and aging-infrastructure policies with priorities, responsible parties, timelines, measurable indicators and capital links for stormwater, water, wastewater, beaches, streets, utilities, transportation, parking, evacuation and multimodal safety.
35	10/23/2026	Letter	HOA Coalition	All Elements & CIE	Requested an integrated implementation framework linking Plan elements to the CIP, master plans, budgets and work programs, with clear responsibilities, sequencing, public engagement, periodic reporting, realistic funding and long-term fiscal sustainability.
36	10/23/2026	Letter	HOA Coalition	H & All Elements	Identified workforce housing as a regional economic priority and requested practical partnerships that protect neighborhood character and property rights; also urged legal review under SB 180 and sufficient time beyond October 2027 if needed for a lawful, well-vetted Plan.
37	10/1/2026	Letter	Carrie Schuman, PhD (Conservancy of Southwest Florida)	All Elements & CIE	Supported the draft's stronger resilience policies and urged clear, enforceable language, consistent implementation, measurable progress reporting, legal review of state preemption issues, and follow-through through subsequent code amendments.
38	10/1/2026	Letter	Carrie Schuman, PhD (Conservancy of Southwest Florida)	FLU & CCM	Recommended stronger standards for permeable surfaces and impervious coverage; climate-informed habitat and wildlife protection; pervious beach parking; and balanced coastal protection using dunes, mangroves and hybrid green/gray strategies while minimizing impacts from seawalls and hardened facilities.
39	10/1/2026	Letter	Carrie Schuman, PhD (Conservancy of Southwest Florida)	R	Supported the new Resiliency Element and recommended regular updates to vulnerability data, consideration of future land-use patterns, expanded agency and nonprofit partnerships, nature-based stormwater strategies, resilient road design, public education, directing development away from vulnerable areas, and use of vacant land, parks, dunes and mangroves for resilience.
40	10/1/2026	Letter	Carrie Schuman, PhD (Conservancy of Southwest Florida)	PFWR	Recommended actively using stormwater retention and biofiltration for aquifer recharge; considering alternative drinking-water supplies; prioritizing septic-to-sewer conversion as sea levels rise; and adding policy to reduce wastewater discharges caused by storm surge.
41	10/1/2026	Letter	Carrie Schuman, PhD (Conservancy of Southwest Florida)	T & PROS	Supported flood-resilient transportation and park policies and recommended assessing resilience when new roads are built and using parks and open spaces proactively for stormwater storage, water-quality treatment and flood management.
42	10/1/2026	Letter	Carrie Schuman, PhD (Conservancy of Southwest Florida)	IC & CIE	Supported regional resilience coordination and capital-planning integration; recommended including SFWMD, CHNEP and nonprofit partners in data sharing and forums, and periodically revisiting levels of service as future storm, flooding and heat conditions change.
43	10/1/2026	Email	Jeff Penn	PROS	Supported retaining Naples Pride Fest and other diverse community events and requested a Comprehensive Plan commitment to reasonable and equitable opportunities for nonprofit, charitable, cultural and community organizations to host events.
44	10/1/2026	Email	Beth Petrunoff	V	Expressed support for the City's work and for retaining the Vision developed through prior broad public participation.
45	10/2/2026	Email	Anonymous (sender: Flats)	PROS	Urged the City to protect Naples Pride Fest and other diverse community events and to ensure fair and equitable opportunities for nonprofit, charitable, cultural and community organizations to host them.

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46	10/5/2026	Email	John F. Baumann	CCM & R	Asked the City to more directly incorporate solar energy into the Plan to reduce energy costs.
47	10/5/2026	Email	John F. Baumann	CCM & R	Recommended rainwater-capture requirements or incentives for homes, condominiums and commercial properties, including roof collection and underground cistern systems.
48	10/5/2026	Email	John F. Baumann	T & FLU	Expressed concern about worsening seasonal traffic and overdevelopment.
49	10/5/2026	Email	Susan Brown	CCM	Recommended adding the following policy under CCM 1.5: To encourage organic methods of pest control and fertilization, less grass or at least indigenous grass and plants, and the planting of useful plants (such as herbs) appropriate for the climate in southern Florida instead of all ornamental plants in both public spaces and private yards.
50	10/5/2026	Email	Duncan J. Cameron	T	Requested improved maintenance, cleaning and marking of streets and sidewalks around hospitals, clinics and residential neighborhoods.
51	10/5/2026	Email	Duncan J. Cameron	N/A	Requested a well-trained and fully staffed Police Department to support community safety.
52	10/5/2026	Email	Kelley Cole	PROS	Requested additional accessible parking spaces at beach ends, noting that existing ADA beach-access improvements are difficult to use when designated parking is unavailable.
53	10/5/2026	Email	Jose Luis Cuin	PROS	Requested evaluation of a compact outdoor National Fitness Campaign Fitness Court at Baker Park as a free public wellness amenity.
54	10/5/2026	Email	Colrick Kaufmann	PROS	Requested an additional dog park because the Baker Park dog park is frequently crowded.
55	10/5/2026	Email	Vincent O'Byrne	CIE	Recommended adding current baselines, numerical targets and timeframes to Plan goals so progress on parks, tree planting and other objectives can be measured over five- and ten-year periods.
56	10/5/2026	Email	Patricia Patierno	FLU	Stated that oversized development and building-height approvals are inconsistent with the Plan's stated goal of preserving Naples' small-scale, quiet character.
57	10/5/2026	Email	Patricia Patierno	T	Expressed concern that airport runway and aircraft changes will increase noise and conflict with neighborhood quiet.
58	10/20/2026	Email	Patricia Patierno	FLU	Expressed concern that Naples is overbuilt and that zoning standards are being set aside for large developments, MUDs and PUDs with greater height, density and reduced spacing, threatening community character and increasing traffic and water demands.
59	10/20/2026	Email	Patricia Patierno	T	Opposed airport expansion and larger or additional aircraft, citing adverse noise and quality-of-life impacts on surrounding residents and stating that larger-aircraft traffic should use RSW.
60	10/5/2026	Email	JM Petrillo	CCM & PROS	Stated that recent beach-use decisions and the pier reconstruction plan are exclusionary and requested continued meaningful public access to beaches and pier amenities, including restrooms and concessions.
61	10/5/2026	Email	Christa Suerken	T & PFWR	Expressed concern that peak-season tourism overtaxes roads, water, electricity and other resources and requested planning based on seasonal demand.
62	10/5/2026	Email	Christa Suerken	H	Identified the need for affordable workforce housing for landscaping, hospitality, cleaning, medical-aide and other service workers, while locating it appropriately.
63	10/5/2026	Email	Christa Suerken	FLU & CCM	Recommended preventing development from expanding onto additional land, directing construction to previously designated or developed sites, and protecting environmental and wildlife resources.
64	10/5/2026	Email	Olya Volpe	FLU	Supported requiring meaningful professional architectural and design review for significant commercial and multifamily development, covering architecture, massing, materials, landscaping, streetscape and compatibility.
65	10/5/2026	Email	Olya Volpe	FLU	Recommended design standards that discourage repetitive, cookie-cutter architecture and promote diversity, craftsmanship, enduring materials, thoughtful landscaping and site-specific design.
66	October 2026	Email	Scott Perry	FLU	Requested that the pace of development slow.
67	October 2026	Email	Scott Perry	FLU	Expressed concern that green spaces, trees and grass are being replaced by concrete and condominiums.
68	October 2026	Email	Scott Perry	CCM	Requested stronger protection for old-growth and landmark trees, citing removal of a banyan tree for development.
69	October 2026	Email	Scott Perry	T & FLU	Opposed additional condominium development because existing roads and signals cannot accommodate the resulting traffic.
70	October 2026	Email	Susan F. Chase	N/A	Stated that the Plan is dense and difficult to read online and recommended simplified wording, more graphics and division into smaller documents.
71	October 2026	Email	Susan F. Chase	T	Requested stronger road-infrastructure and traffic-relief strategies to address extreme seasonal traffic volumes.
72	10/7/2026	Email	Susan F. Chase	CCM & IC	Objected to extensive tree and shrub removal at the Pine Ridge Road/I-75 interchange as inconsistent with green-space and tree-canopy goals.
73	10/7/2026	Email	Susan F. Chase	T & IC	Requested additional sound barriers for the I-75 widening between Golden Gate and Immokalee Road to protect nearby neighborhoods from traffic noise.
74	10/7/2026	Email	Susan F. Chase	T & IC	Expressed concern that additional commercial flights at Naples Airport are increasing aircraft noise in Old Naples and surrounding areas.
75	10/12/2026	Email	Mary Young (Old Naples Association)	V	Recommended retaining the existing Naples Vision without modifications.
76	10/12/2026	Email	Mary Young (Old Naples Association)	V	Submitted the “Naples Ten” as companion principles for the Plan.
77	10/12/2026	Email	Mary Young (Old Naples Association)	FLU	Proposed a Community Value framework with 25 amendments.
78	10/12/2026	Email	Mary Young (Old Naples Association)	n/a	Proposed a new Home Rule and Local Authority Element.
79	10/15/2026	Email	Sandy Smyth (Digital Artist)	PROS	Expressed support for the arts as important to personal and community well-being, emphasizing that creative activity connects people emotionally, physically and socially.
80	10/19/2026	Email	Caien Darling	PROS	Supported retaining Naples Pride Fest and other diverse community events and requested equitable opportunities for nonprofit, charitable, cultural and community organizations to host them.

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81	10/19/2026	Letter	Naples Airport Authority	T & FLU	Supported recognition of the Airport's economic role and continuation of land-use compatibility policies, including protection of safe operations and limits on residential or noise-sensitive uses within the 60 dB DNL contour.
82	10/19/2026	Letter	Naples Airport Authority	T, FLU & IC	Requested clear acknowledgment that federal law preempts City regulation of aeronautical operations, development and noise control and that Airport management is the Authority's responsibility; cautioned against policies implying City approval or management authority.
83	10/19/2026	Letter	Naples Airport Authority	T, FLU & IC	Requested revisions to specific Airport policies, clarification of runway safety and utilization-plan terminology, use of current FAA land-use definitions, flexible intergovernmental coordination language and collaboration with Authority counsel on legally appropriate text.
84	10/19/2026	Letter	Joan Tobin, Anthony Solomon & Matthew Kragh (Naples Business Principals)	V	Recommended a new public process to update the Vision to reflect post-Ian flood risk, infrastructure needs, redevelopment, demographic change, recovery and resiliency before advancing an elective Plan update described as implementing that Vision.
85	10/19/2026	Letter	Joan Tobin, Anthony Solomon & Matthew Kragh (Naples Business Principals)	All Elements & Appendix	Recommended removing or revising vague terms such as community character, Green Jewel, intensity and compatibility when used for development decisions, and replacing them with clear, objective and measurable standards.
86	10/19/2026	Letter	Joan Tobin, Anthony Solomon & Matthew Kragh (Naples Business Principals)	FLU & PR	Requested removal or revision of provisions affecting setbacks, building area, lot coverage, open space and other development rights until impacts on residential and commercial property owners are identified, legally reviewed and publicly vetted.
87	10/19/2026	Letter	Joan Tobin, Anthony Solomon & Matthew Kragh (Naples Business Principals)	All Elements	Recommended removing detailed regulatory and administrative “Actions” from the Comprehensive Plan or restating them as policy direction, with implementation handled through the Land Development Code, budgets and work programs following public review.
88	10/19/2026	Letter	Joan Tobin, Anthony Solomon & Matthew Kragh (Naples Business Principals)	All Elements	Asserted that numerous proposed policies and Actions may be more restrictive or burdensome than the adopted Plan and conflict with Senate Bill 180; requested a provision-by-provision legal comparison and removal or deferral of conflicting language before transmittal or adoption.
89	10/20/2026	Email	Mary Allen	FLU & CCM	Expressed concern that agricultural and undeveloped land is being rezoned and built upon, resulting in loss of green and natural areas; recommended limiting further development and preserving land for walking paths and quiet open space.
90	10/20/2026	Email	Mary Allen	T & PSFE	Raised concerns about school siting and transportation planning, including inadequate parent parking, limited access points, added traffic and lack of shade trees along expanded roads and sidewalks.
91	10/20/2026	Email	Mary Allen	PROS & PFWR	Requested more neighborhood-scale parks so children do not need to be driven to major parks and urged planning to protect future water availability.
92	10/20/2026	Email	Frank Cerveny (Aqualane Shores)	R, PFWR & CIE	Urged infrastructure resilience—especially stormwater drainage—as the City's top capital priority, with an independent capacity assessment, measurable standards, risk-based investment, a funded schedule, public reporting and development review tied to available capacity and downstream flood impacts.
93	10/20/2026	Email	Tom Jennings	T, IC & HR	Requested that the City prioritize regaining control of the Naples Airport Authority/Airport and defend other municipal powers threatened by state action through available legal measures.
94	10/20/2026	Email	Anis Khalil	FLU & CCM	Requested retention of Plan provisions that preserve Naples' architectural and community character, natural resources and ecological health.
95	10/20/2026	Email	David Mason	V, Appendix & T	Recommended recognizing peace and quiet as components of the Green Jewel, community character and small-town charm, including protection of homes, parks and natural areas from aircraft and airport noise impacts.
96	10/20/2026	Email	Ron Petrunoff	FLU, T & CCM	Recommended less-intensive, resident-focused development to preserve small-town charm, ecological resilience and mobility; opposed oversized hotels, condominiums, restaurants, variances and parking garages serving tourism where they increase traffic, water demand, pollution and wastewater needs.
97	10/20/2026	Email	Joanne Robinson	T	Requested completion and improvement of sidewalks in Old Naples, noting missing segments and abrupt sidewalk endings that create pedestrian-safety risks.
98	10/20/2026	Email	Ron Sills	T & IC	Suggested overpasses at Pine Ridge Road over Airport-Pulling Road and Livingston Road, and at Golden Gate Parkway over Livingston Road.
99	10/21/2026	Email	James Bowens	T & IC	Described severe seasonal congestion on City, County and interstate roads and urged earlier, coordinated roadway-capacity improvements, including additional I-75 capacity.
100	10/21/2026	Email	James Bowens	FLU & CIE	Requested slower population, tourism and development growth and recommended providing adequate housing, hotels, parks, beaches and transportation infrastructure before accommodating additional residents and visitors.
101	10/21/2026	Email	Joe Migliara	FLU & T	Proposed prohibiting principal-use public or commercial multilevel parking garages within 500 feet of specified single-family and low-density residential districts to protect neighborhoods from traffic, noise and commercial intensity, subject to legal and data review.
102	10/23/2026	Letter	Collier Building Industry Association (CBIA)	All Elements & Appendix	Requested objective, measurable standards for project consistency, compatibility and character; restoration of predictable consistency tests and overlay/CRA provisions; and clarification that Vision concepts are not independent grounds for denial.
103	10/23/2026	Letter	Collier Building Industry Association (CBIA)	FLU, PFWR & R	Requested feasibility and cost testing for proposed building-envelope, open-space, tree, stormwater, resilience and permit-stage requirements, with protections for completed applications and compliance with the Florida Building Code and impact-fee law.
104	10/23/2026	Letter	Collier Building Industry Association (CBIA)	All Elements & PR	Requested preservation of existing provisions supporting redevelopment, remodeling, historic-property flexibility and property rights, or an on-record explanation for removals; opposed untested provisions that reduce buildable area or add burdens.
105	10/23/2026	Letter	Collier Building Industry Association (CBIA)	All Elements & IC	Requested stakeholder working sessions, an Action-to-Code mapping table, written legal review under SB 180 and the new compatibility statute, Collier County coordination and no transmittal until key legal, technical and public-review steps are complete.

Penny Taylor (Lake Park resident)

Dates sent: August 1, 2026; September 29, 2026

Evaluation Comments

Naples 2045 Comprehensive Plan

August 2026

Florida law requires every local government to maintain a Comprehensive Plan and it is one of the most important planning tools a municipality has.

At its heart, the Plan is about the growth of a community — how the residents want their community to grow and how the government will provide for both current and future residents. The Comprehensive Plan combines the technical knowledge of professional planners with critical input from the people who live and work in that community to establish how the community should grow and change over time.

Once adopted, the Plan also becomes an important tool used by the Planning Department when reviewing development petitions and determining whether proposed growth is consistent with the community's long-range plans.

At the June 5, 2024 City Council meeting, Planning Director Erica Martin described the Comprehensive Plan as the City's *"big guiding document"* — the document that guides the City's code and, in turn, its planning decisions.

The foundation of my comments on the Naples 2045 Draft Comprehensive Plan is the timeliness of the studies, reports and information used to develop and support the policies in the Draft Plan.

I am not qualified to question the professional validity of that information. I am, however, aware of the requirements of Florida law.

Florida Statute §163.3177(1)(f) provides:

"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" and may include *"surveys, studies, community goals and vision, and other data available at the time of adoption."*

Vision Element

The Vision is not a required element of a Comprehensive Plan under Florida law; it is an optional element.

It was, however, historically included in the Naples Comprehensive Plan, later removed, and ultimately restored as an optional element in 2024, as allowed by Florida Statute as confirmed by Erica Martin, Planning Director.

The Vision being considered in the Naples 2045 Draft Comprehensive Plan was developed through a community visioning process conducted in 2019–2020, before Hurricane Ian.

At the June 5, 2024 City Council meeting, Planning Director Erica Martin described the purpose of the Vision Work Plan (the document that connects the Vision to the goals, objectives and policies in the other elements of the Comprehensive Plan) as showing how *"all the goals, objectives and policies in the various elements tie[d] back to your vision."*

Comparison of Stated Intent:

2019–2020 Vision Process vs. 2025–2026 Process

The Naples 2045 Draft states that the 2019 process assessed the earlier version — the 2007 Vision — to determine whether the City had been successful in implementing it and *"to decide if a change in direction or priorities was warranted."*

By contrast, the 2045 Draft states that the current 2025–2026 process reaffirmed the Initiatives and Priorities of the Vision developed through the 2019–2020 visioning process. The Vision was adopted by City Council in March 2020 and incorporated into the Comprehensive Plan in August 2024. The Draft further states that community input *"validated the City's Vision priorities"* and that the 2025 effort was focused on *"reinforcing the newly adopted Vision."*

- In 2019–2020, the City asked the public to consider whether a *"change in direction or priorities was warranted."*
- In 2025–2026, the City described the public process as one intended to reaffirm, validate and reinforce the existing Vision.

Why The Change In Conditions Matters

Florida Statute §163.3191(3) states that local governments *"shall comprehensively evaluate and, as necessary, update comprehensive plans to reflect changes in local conditions."*

Section 163.3177(1)(f) requires mandatory and optional elements of the Plan to be based upon *"relevant and appropriate data"* and explains that being based on data means the local government must *"react to it in an appropriate way and to the extent necessary indicated by the data available."*

In 2022, Hurricane Ian made landfall on the southwest coast of Florida and represented a significant change in local conditions. In 2024, new FEMA Flood Insurance Rate Maps took effect, changing flood-zone or elevation requirements for some properties. In addition, the City's longstanding NFIP substantial-damage/substantial-improvement requirements, including the 50% threshold, continue to affect how damaged or substantially improved properties may be reconstructed. Naples is also subject to federal National Flood Insurance Program requirements under 44 C.F.R. Parts 59 and 60.

Those requirements can directly affect neighborhood scale.

Yet the Naples 2045 Vision engagement questions continued to ask residents about such concepts as *"Low rise buildings"* as a characteristic of Naples' small-town feel and whether the *"height of [a] new home steps down to adjacent lower height homes."*

That is why the distinction between reaffirming the existing Vision and reassessing it after Hurricane Ian becomes important.

The issue is not whether residents still value low-rise buildings, neighborhood scale or the character of Naples.

The question is whether residents were given the opportunity to consider those values in light of the post-Ian rebuilding requirements that now affect how those values can actually be implemented.

Round 2 Questionnaire and Current Rebuilding Requirements

At the January 20, 2026 joint City Council–Planning Advisory Board workshop, the consultants **recognized the difficulty of reconciling the City's current development standards and community-character expectations with the practical requirements that now affect redevelopment.**

The point was raised briefly and somewhat indirectly during this joint workshop. Neither the Planning Advisory Board nor City Council commented on the issue or developed it into a broader discussion.

This is important because the Round 2 questionnaire asked residents to express preferences about building height, scale, setbacks, compatibility and redevelopment, yet

the questionnaire did not explain the practical requirements that may affect how those preferences can actually be implemented.

In other words, residents were being asked what future redevelopment should look like without being given the factual context necessary to understand some of the requirements that now affect what future redevelopment can look like.

This omission is particularly important after Hurricane Ian. New flood elevations and rebuilding requirements can affect the height and form of a structure, its relationship to neighboring buildings and, ultimately, neighborhood scale and compatibility.

Questions Raised

1. **At the in-person public meetings, what information, if any, was provided to the participants about the post-Hurricane Ian rebuilding requirements and how those requirements may affect building height, scale, setbacks and compatibility?**
2. **How are the Round 2 questionnaire responses concerning building height, scale, compatibility and redevelopment going to be evaluated by the consultants and our elected officials against the backdrop of the very different development rules in place today?**

Population & Demographics Element

Population is fundamental to planning because it affects the demand for roads, water, sewer, parks and other public services.

The Naples 2045 Draft uses a **20% increase over permanent population** to estimate peak-season population for land-use planning. Yet earlier City estimates were considerably higher:

- The **2005 Evaluation and Appraisal Report** estimated a seasonal increase of more than **50%**.
- The **FY 2018–19 City Budget** showed a permanent population of 20,195 and a potential seasonal population of 33,748 — an increase of approximately **67%**.
- The Naples 2045 Draft itself estimates **19,421 permanent residents and as many as 14,626 seasonal residents** in 2023, while acknowledging that seasonal trends could result in a peak population greater than the 20% assumption.

Questions

1. **Why is there such a large difference among these population estimates, and why was 20% selected for the Naples 2045 planning assumption?**
2. **Whose responsibility is it to determine which population figures and methodology are used — the consultant or City staff — and what data support that decision?**
3. **Were the most recent population and seasonal-residency figures used during the 2025–2026 review and if not, why not?**
4. **Where different population estimates or methodologies are used among elements, what supporting data and analysis justify those differences, and how is consistency among the elements ensured under Florida Statute §163.3177(2)?**

Future Land Use / Redevelopment Element

Florida Statute §163.3177(6)(a)2 specifically identifies projected permanent and seasonal population and the need for redevelopment among the data applicable to the Future Land Use Plan.

Naples is largely built out. As a result, development through 2045 will increasingly occur through redevelopment of properties rather than through the development of vacant land.

Redevelopment can also change the scale and intensity of a property as owners respond to new building codes or the market. Permanent population alone may not describe the development pressure that redevelopment can place on roads, water, sewer, stormwater and other public facilities.

There does not seem to be an analysis that projects the amount and scale of redevelopment through 2045, or that separates pre- and post-Hurricane Ian redevelopment to determine whether the scale of redevelopment has increased since the storm.

The City's 2025 materials identify **106 approved projects from 2020 through 2025 — 52 commercial, 31 mixed-use and 23 residential —** and map their locations and associated intensity.

The Future Land Use designations do not forecast the amount or scale of redevelopment that is reasonably expected through 2045.

Questions

1. **Since Hurricane Ian, there is a perception that redevelopment is occurring at a greater scale or intensity than the development it replaces. Has the City verified this by comparing pre- and post-Hurricane Ian development in terms of square footage, building footprint, height, residential units, hotel rooms or lot coverage? If so, how was that information considered in preparing the Naples 2045 Draft Plan?**

Housing Element

The Housing Element states that its goals, objectives and policies are based on an inventory and analysis of the existing housing stock and that the supporting information represents the **"best available data"** and **"recent data available."** Because the Housing Element is intended to address housing needs through **2035 and 2045**, the date of the information used to evaluate current housing conditions and affordability is important.

The City-specific housing information identified in the Draft, however, is principally from the **2023 American Community Survey**. The dates of much of the other supporting data are not identified, even though the data address rent, housing value, monthly costs of owner-occupied housing, and rent or cost-to-income ratios.

Questions

1. **What are those dates of the housing data used to evaluate rents, housing values, owner costs, affordability and cost-to-income ratios in the Housing Element?**
2. **The Draft relies principally on the 2019–2023 American Community Survey 5-year estimates. The Census Bureau released the 2020–2024 ACS 5-year estimates on January 29, 2026. Were the 2024 estimates reviewed for the current Draft, and if not, why not?**

Conservation and Coastal Management Element

The Conservation and Coastal Management Element states that it is based on technical studies, environmental data and planning documents, including flood data, the Naples Bay SWIM Plan, the Coastal Resources Map, hazard-mitigation information and the forthcoming update to the City's Stormwater Master Plan…but dates are not identified for most of the supporting data.

Hurricane Ian's effect on the City of Naples was an unwelcome but powerful generator of data for this element.

Questions

1. **Which studies, maps, datasets and other supporting materials used for the Conservation and Coastal Management Element incorporate post-Hurricane Ian conditions, and which rely principally on pre-Ian information?**
2. **Given the extent of flooding and damage caused by Hurricane Ian, if the updated Stormwater Master Plan is still forthcoming, how were current and future flooding and stormwater conditions evaluated for purposes of the 2045 planning horizon?**

Resiliency Element

The Resiliency Element is supported by comparatively recent information, including the City's **2023 Critical Assets and Facilities Vulnerability Assessment**, **2024 Critical Assets and Facilities Adaptation Plan**, and **2024 Green Print**. These efforts reflect a substantial and commendable investment by the City in understanding Naples' exposure to flooding, storm surge, infrastructure vulnerability and other environmental risks.

The Element also calls for continued use of the **best available data**, including observed hazard impacts, repetitive-loss information and the latest scientific predictions, in future planning and policy decisions.

Question

Do the 2023 Vulnerability Assessment and 2024 Adaptation Plan fully incorporate the flooding and other conditions observed during and after Hurricane Ian, and have any significant 2025–2026 data or findings emerged that should also be incorporated into the Naples 2045 Plan?

Public Facilities and Water Resources Element

The Public Facilities and Water Resources Element contains some current information, including 2025 water and wastewater service-area estimates, but the Water Supply Facilities Work Plan incorporated into the Element relies on considerably older information, including the **2008 Integrated Water Resources Plan, the 2017 Lower West Coast Water Supply Plan, 2010 Census-based population projections, a 2016 service-area population and 2014–2015 water-demand data**.

At the same time, the Draft states that updated **Water/Sewer and Stormwater Master Plans are not expected to be completed until early 2027**.

The July 2026 Extended Public Review Draft also contains solid-waste language stating that Collier County's landfill contract and raw-land capacity extended to 2016.

Questions

1. **What current 2025–2026 data and analysis were used to update or validate the older population, water-demand and water-supply information contained in the Water Supply Facilities Work Plan?**
2. **If the updated Water/Sewer and Stormwater Master Plans will not be completed until 2027, how were the City's public-facility, water, wastewater and stormwater needs evaluated for the 2045 planning horizon?**
3. **What current solid-waste data replaced or validated that information?**

Transportation Element

The Draft states that the Transportation Element is supported by the **FDOT Five-Year Transportation Plan, Collier County Long Range Transportation Plan, Collier MPO Transit Plan, Naples Pedestrian and Bicycle Master Plan, corridor studies, other master plans, and 10- and 25-year transportation planning alternatives**. However, it does **not identify the dates of these principal supporting plans and studies**.

The **Downtown Naples Mobility & Connectivity Study was completed in 2017** and is still referenced for transportation, parking and multimodal planning in the U.S. 41/downtown area.

The Element also calls for monitoring traffic volumes, peak-hour and peak-season traffic, levels of service and transportation capacity. But the Draft does not identify the dates of

the traffic counts used, how those counts fit within the City's annual, monthly and quarterly traffic-counting schedule, or whether the level-of-service data used by the City are shared or coordinated with Collier County's transportation department.

Question

What are the dates of the principal transportation plans, studies and data used to support the Transportation Element, and were the most current versions available during the 2025–2026 review used?

Parks, Recreation and Open Space Element

The Parks, Recreation and Open Space Element contains an inventory of public recreation facilities identified as current **"as of March 2026."** The Element also directs new park facilities to use the City's **2023 Critical Assets and Facilities Vulnerability Assessment** and references the **2024 Green Print**.

However, the Draft does **not provide a complete, clearly dated data-and-analysis foundation for the Element**. The principal **Parks and Recreation Master Plan is still being updated**, and the Draft states that the plan will be based on site inventories, a community needs survey and public engagement and will guide future City investment through the Capital Improvements Plan.

At the same time, the Element still refers to the **2015 Needs Assessment** for recreational programming, even though the Element itself calls for a statistically valid resident needs survey **every five years**. The Draft also states that the City will review and update its park level-of-service standards **after completion of the 2026 Parks and Recreation Master Plan**.

Questions

1. **If the 2026 Parks and Recreation Master Plan and its community needs survey were not complete when the Naples 2045 Draft was prepared, what current data were used to determine the City's parks and recreation needs through 2045?**
2. **Once the 2026 Parks and Recreation Master Plan is completed, will its findings — including any updated needs assessment and changes to level-of-service standards — be incorporated into the Naples 2045 Comprehensive Plan before adoption?**

Intergovernmental Coordination Element

The Intergovernmental Coordination Element states that it is based on **interlocal agreements, shared data, coordinated studies, relevant plans and technical information** involving Collier County, the State of Florida, the Southwest Florida Regional Planning Council, the Naples Airport Authority, the District School Board and other agencies. However, the Draft does **not identify the dates of most of the agreements, plans, studies or shared data relied upon for this Element**.

That is important because one of the principal purposes of the Element is to ensure that the City's Comprehensive Plan is consistent with current **State, regional and County plans** and to coordinate land use, infrastructure and public services that cross jurisdictional boundaries.

The Element refers, for example, to existing **City–County interlocal agreements for water and sewer services, septic-to-sewer projects, school planning and concurrency**, as well as coordinated land-use studies and level-of-service standards. The Draft generally does not identify when those agreements or supporting studies were adopted or last updated.

The Element also places considerable emphasis on future intergovernmental coordination concerning **flooding, storm impacts, infrastructure vulnerability and emergency preparedness**, including sharing the best available data among the City, County, state and federal agencies.

Questions

1. **What are the dates and current status of the principal interlocal agreements, coordinated studies, shared data and governmental plans relied upon to support the Intergovernmental Coordination Element, and were the most current versions available during the 2025–2026 review used?**
2. **What current intergovernmental data and analysis were used to evaluate cross-jurisdictional land-use, infrastructure, public-service and flood-risk issues through the 2045 planning horizon?**

Concurrency and Capital Improvements Element

The Concurrency and Capital Improvements Element identifies relatively current supporting information, including the City's **2024–2025 Adopted Budget, the 2024 and 2025 Annual Level of Service Reports, the 2023 Critical Assets and Facilities Vulnerability Assessment, and the 2024 Critical Assets and Facilities Adaptation Plan**.

The Element relies principally on the City's **Five-Year Capital Improvements Program (CIP)** to identify and fund capital projects. The CIP is updated annually, while the Comprehensive Plan has a **20-year planning horizon through 2045**. The Draft states that the Five-Year CIP is intended to be internally consistent with implementation of that 20-year planning period.

Hurricane Ian provided a real-world test of the City's infrastructure and stormwater systems. That experience is particularly important because several of the plans intended to identify and prioritize future infrastructure needs are still being completed or updated.

The Draft states that the **Water/Sewer Master Plan** and **Stormwater Master Plan** are anticipated to be completed in **early 2027**, with the Stormwater Master Plan having a **20-year investment horizon**. The Draft separately refers to a **2026 Watershed Master Plan** and provides that the City will review its stormwater level-of-service standards within one year after that plan is completed. It also refers to the **2026 Parks and Recreation Master Plan**, after which the City will review and update its parks and recreation level-of-service standards as needed.

Questions

1. **How did what the City learned from Hurricane Ian affect the assumptions, priorities or projects being developed in the City's major infrastructure master plans?**
2. **Given that several of the master plans are expected to be completed in 2026 or early 2027, can their findings be incorporated into the Naples 2045 Comprehensive Plan before the Plan is transmitted or adopted?**

Private Property Rights Element

No comment.

The Element is primarily statutory in nature and does not raise the same data-timeliness issues identified in the other elements reviewed.

Conclusion

Several of the most important plans that will determine Naples' long-term needs are still being completed or updated. The four elements where **current post-Hurricane Ian information is particularly important** are:

- **Public Facilities and Water Resources**
- **Conservation and Coastal Management**
- **Parks, Recreation and Open Space**
- **Concurrency and Capital Improvements**

Based upon what Hurricane Ian revealed about the City's infrastructure and future needs,

would it make more sense to finish those studies first and then incorporate what they tell us into the Comprehensive Plan?

Once incorporated, the Plan could move forward for adoption.

Penny Taylor, Resident Lake Park

239-269-0331

Naples 2045 Draft Comprehensive Plan

Summary of Submitted Comments

Penny Taylor | Lake Park Neighborhood | 239-269-0331

I am advocating for an accurate and legally defensible Naples 2045 Comprehensive Plan that reflects current conditions.

Plans expected in early 2027

- Water/Sewer Master Plan — expected in early 2027.
- Stormwater Master Plan — expected in early 2027.
- The Draft also refers to 2026 Watershed and Parks and Recreation Master Plans. The City should confirm their status and how their findings will be considered before adoption.

What Florida law requires

- The Plan must use relevant and appropriate information and analysis, and be reviewed and updated as needed when local conditions change (§§163.3177(1)(f) and 163.3191(3), Florida Statutes).

Why the 2020 Vision needs another look

- The Vision came from public input gathered in 2019–2020, before Hurricane Ian in September 2022. Adding it to the Plan in 2024 did not update those survey responses.
- The 2025 and 2026 process was described as confirming the existing Vision. That does not replace reviewing it against current conditions.
- The questionnaire asked about building height and neighborhood character without explaining the applicable laws and rebuilding requirements, including the effects of the 2024 flood maps. Residents need that information to judge how their preferences can be carried out.

What would waiting actually cost

- I have exchanged several emails with Erica Martin, the Planning Director, about the additional cost of adjusting the schedule to accommodate the two critically important Master Plans.
- Those email threads are included in my comment submission.
- What would it cost, beyond the amended consultant agreement already signed, to pause remaining work, let the plans be completed and publicly reviewed, include their relevant findings, and then resume? Council needs a breakdown of any extra work and cost.

My request to Council and the Planning Advisory Board

- Consider completing the studies and using their relevant findings before adopting the Plan.
- Review the earlier Vision against current conditions and applicable requirements.
- Identify the additional cost and time needed to do this.

Source Submitted Evaluation Comments, August 2026.

From: Penny Taylor
To: Erica Martin
Subject: Re: Comprehensive Plan Process
Date: Tuesday, September 29, 2026 8:02:58 AM

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Good Morning Erica,

Thank you for your prompt response to my email last week. It would be helpful to this process if we could get an idea about any additional costs related to changing the timeline. There are at least two developing plans that will be completed in early 2027 according to the City — the Water/Sewer and Stormwater Master Plans. That less than six months away from this date if the completion dates for both of these master plans remains "early 2027".

Of course, this is ultimately a City Council decision and I respect that process. However, another delay may increase the taxpayers cost of the process and it would be helpful to know that cost before the hearings start in the City Council chambers.

Thank you Erica and enjoy your day.

Best regards,

Penny



Penny Taylor
Government Consultant | Public Policy, Grants, and Program Leadership
+1 (239) 269-0331 | penny@pennytaylor.biz | LinkedIn

On Sep 24, 2026, at 9:19 AM, Erica Martin <emartin@naplesgov.com> wrote:

Penny,

I would have to verify with the consultant. All changes to the contract, including to the timeline, must be approved by City Council.

Thank you,

<image001.png>

Erica J. Martin
Planning Director
City of Naples
295 Riverside Circle, Naples, FL 34102
emartin@naplesgov.com
Office: (239) 213-1050 | Mobile: (239) 227-4377

From: Penny Taylor <penny@pennytaylor.biz>
Sent: Wednesday, September 23, 2026 4:19 PM
To: Erica Martin <emartin@naplesgov.com>
Subject: Re: Comprehensive Plan Process

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Hi Erica,

So, the tasks determine the expense and in theory, and I am not suggesting that this is what I am advocating, but in theory if the comprehensive plan process was temporarily put on hold, there would not be additional costs during that 'hold' time?

Thank you Erica.

Penny
<image002.jpg>

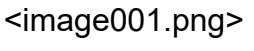
Penny Taylor
Government Consultant | Public Policy, Grants, and Program Leadership
+1 (239) 269-0331 | penny@pennytaylor.biz | LinkedIn

On Sep 23, 2026, at 4:14 PM, Erica Martin <emartin@naplesgov.com> wrote:

Hi Penny,

Pursuant to the Amended Professional Services Agreement (previously provided) the cost additional cost was assessed based upon the revised tasks outlined in the Agreement, not the extended timeline. If additional tasks (including drafting, meetings, presentations, etc.) are added, additional costs will be incurred.

Thank you,



Erica J. Martin
Planning Director
City of Naples
295 Riverside Circle, Naples, FL 34102
emartin@naplesgov.com
Office: (239) 213-1050 | Mobile: (239) 227-4377

From: Penny Taylor <penny@pennytaylor.biz>
Sent: Friday, September 18, 2026 9:11 AM
To: Erica Martin <emartin@naplesgov.com>
Subject: Re: Comprehensive Plan Process

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caution when opening attachments or clicking links, especially from unknown senders.

Good Morning Erica,

Thank you for the executed amendment to the Professional Service Agreement with Johnson Engineering.. I read through the agreement but didn't find any penalty if the dates noted in the agreement were moved to future dates based on the completions and PAB/Council review of specific engineering plans referenced in the Draft.

Basically the tasks would remain the same but are 'put on hold' (and the dates noted in the agreement would change, of course) until these specific plans are completed. It is aniicipated that would be next year.

Would this temporary cessation of the Comprehensive Plan process UNTIL these plans were completed and approved by the PAB/ City Council incur additional costs? And if so, what is an estimate of those costs?

Thank you Erica.

Best regards,

Penny

<image002.jpg>

Penny Taylor
Government Consultant | Public Policy, Grants, and Program Leadership
+1 (239) 269-0331 | penny@pennytaylor.biz | LinkedIn

On Sep 17, 2026, at 4:21 PM, Erica Martin <emartin@naplesgov.com> wrote:

Hi Penny,

Attached is the executed amendment to the Professional Services Agreement with Johnson Engineering, which includes (on the last page) the cost. The cost was assessed based upon the revised tasks outlined in the Agreement.

Thank you,

<image001.png>

Erica J. Martin
Planning Director
City of Naples
295 Riverside Circle, Naples, FL 34102
emartin@naplesgov.com
Office: (239) 213-1050 | Mobile: (239) 227-4377

From: Penny Taylor <penny@pennytaylor.biz>
Sent: Thursday, September 17, 2026 1:31 PM
To: Erica Martin <emartin@naplesgov.com>
Subject: Comprehensive Plan Process

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Good Afternoon Erika,

Do you have an estimates of what the additional costs have been for this most recent 'delay' in the Comprehensive Plan process (I believe October is the

month the Draft Plan with the most recent comments goes to the PAB). Is this the standard add on price? Of there was another delay what would that be?

Or maybe these additional expenses are de minimis because the intensive part of the process had already been completed? And I guess, the final question is: what was the bid price from the consultant who was selected by the City Council last year.

Thank you!

Best regards,

Penny

<image002.jpg>

Penny Taylor
Government Consultant | Public Policy, Grants, and Program Leadership
+1 (239) 269-0331 | penny@pennytaylor.biz | LinkedIn

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James & Joan DeVore (Moorings residents)

Dates sent: August 13, 2026; September 5, 2026

From: James DeVore
To: Erica Martin
Subject: Fwd: My Input for Naples 2045 Comprehensive plan update.
Date: Monday, August 17, 2026 10:15:54 AM

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Please confirm you received this Input email. Otherwise I'll feel obligated to drive downtown and deliver a hard copy.
Thank You,
James DeVore
239-300-8303

---------- Forwarded message ---------
From: **James DeVore** <jamesdevore.jd@gmail.com>
Date: Thu, Aug 13, 2026 at 3:25 PM
Subject: My Input for Naples 2045 Comprehensive plan update.
To: <emartin@naplesgov.com>

To: Erica Martin,

Having participated in each stage of the Comprehensive Plan Update I want to say that the latest version has continued improvements.

My Input for further Improvements:

1) Policy FLU 4.1 Promote Florida Friendly Landscaping should be stated such that is clear that it applies as an overriding Policy that must be applied when considering Policy FLU-1.24 Street Tree Program and Policy T-9.111 Street Tree Program. My meaning is that it should be made clear that the Trees to be used in the Street Tree Program should and will be revised and changed when those street trees conflict with FLU 4.1 and that the overriding principle to be followed on city property is "Right Tree, Right place, Florida Friendly." Today we have numerous street trees along specific roads that do not meet this criteria. They are fouling our storm water systems with over abundant Tree Debris and some are not capable of with standing our storm season weather, or our dry season without excessive irrigation. The City Arborist should be given the authority and policy direction to migrate street trees over time to comply with Policy 4.1. The city has already taken action in this regard on an ad hoc basis by replacing Banyan Trees with Native Oaks. Changes of this type should be regular action following clear policy, not ad hoc reactions to disasters. Perhaps Action FLU-4.3.7.does this? If so, it should be stated clearly and strengthened.

2) Policy FU 6.5 Identifying Character elements to protect and Action FU-6.5.1
when applied to single family low density housing is a slippery slope indeed! Naples has gone through wave after wave of prevalent house designs with each new wave making the prior obsolete and non-preferred. Let me site some examples. a) In moorings we still have many

"Michigan Houses" from the original homes built in the neighborhood. Today, while some are still successfully gutted and rebuilt, they no longer serve as an example for New Construction. b) In the 80's the Mediterranean or Tuscan style was the rage for new homes. But now you must remodel inside and out to "De-Tuscanize" those homes in order to sell them. c) The current trend was "west Indies" that has morphed into Coastal, and as a result you have White Houses with Black Roofs and non-structural vertical roof supports, being made by multiple builders all over town. I have three in a row across from my house that were built in the last 5 yrs. Two have roof leaks. The more the builders make of those, the sooner the style trend will move on to something else. My advice is to stay well clear of any policy or action that specifically dictates Style. Naples will be better off without style police and will naturally adapt to changes in individual, demographic, and sociological changes over time.

3) Policy T-1.5 Should clearly state that ROW regulations will be brought up to date when it serves the public safety. Regardless, of previously "Grandfathered" exceptions and Code changes that were not made retroactive allowing older mid/high density housing to avoid compliance with modern ROW safety Codes. Many properties that were built 60 or more years ago are now in densely populated and heavily used areas along the coast (Ex: Gulf Shore Blvd North). Those must and should be brought up to current standards for ROW use to support other initiatives that promote walking and bike riding safely. All Street ROW areas should be brought up to the latest code requirements.

Thank you for your time and consideration.

James DeVore
2393008303
3000 Regatta Rd
Naples FL 34103
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From: Joan Devore
To: Erica Martin
Subject: Input on Comprehensive Plan Update
Date: Saturday, September 5, 2026 11:00:21 AM

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Erica,
I wish to express my support for the Florida Friendly Landscaping policy and this policy should governThe Street Program and Policy .

I wish to express my support for "Right Tree,Right Place, Florida Friendly". A policy direction should be made in order to migrate street trees over time to comply with policy 4.1.

Do not support Policy FU6.5 identifying character elements to protect and action FU-6.5.1 when applied to single family low density housing.

Regarding Policy T-1.5 , It should clearly state that ROW regulations will be brought up to date when it serves public safety. Regardless of code changes that were not made retroactive and previously "grandfathered " exceptions.

Thank you for allowing me to provide this additional input.

Kindest Regards,
Joan Mobley DeVore
3000 Regatta Rd. 34103
812-343-8813 cell
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Barbara J. Rudd (Naples Diamond Realty)

Dates sent: August 13, 2026; October 6, 2026

From: Barbara Rudd
To: Erica Martin
Date: Thursday, August 13, 2026 8:22:51 PM

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I am not sure where the Naples city area is headed, but I do know why so many of us came here in the first place: the charm of Naples.
Everyone talks about preserving that charm, but I'm not sure everyone truly understands what "charm" means when it comes to building codes and the character of our city.
We need basic, thoughtful guidelines that protect what makes Naples special and ensure it remains a place people want to visit, love, and come back to. There used to be more art! Creative things people saw and thought wow this is great!
With regards to building, things like traditional awnings, appropriate shutters, and architectural details that reflect the character of Naples matter. No glass or Plexiglas railings!
We are not Miami, and we don't want to become Miami.
Cambier Park is another example. It should be our "Central Park," yet it has been looking neglected and is in terrible shape. Our parks and public spaces are a huge part of the beauty and character of Naples and deserve to be treated that way.
Thank you for working on these issues. It really isn't that difficult—but we need clear guidelines for builders, developers, and architects.
Most importantly, we need to establish those guidelines before we lose the very charm that made Naples so special in the first place.
Let's set the standards and protect the character of Naples for generations to come.

Thank you for working on all this..
We love Naples

Barbara J. Rudd
Naples Diamond Realty
D: (239) 961.0775
EM: Naplesdiamondrealty@gmail.com

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From: Barbara Rudd
To: Erica Martin
Subject: Naples evaluation from people who live here
Date: Tuesday, October 6, 2026 12:27:19 PM

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Erica (sorry its so long)

I have attended several of the comprehensive meetings, and I also work downtown, where I speak with and interact with many people who live here. Based on those conversations, as well as my own observations, I feel strongly that downtown Naples is losing much of the charm and character that made it special in the first place.

In the opinion of many people I speak with, downtown has already "lost its charm."

We are seeing Miami-style condominium buildings going up that lack the character, architectural detail, and sense of place that once defined Naples. Glass railings, repetitive designs, and buildings that seem out of scale with the traditional character of downtown are becoming increasingly common. What exactly are the standards or restrictions governing building design? And who is making sure that new construction actually compliments Naples rather than turning it into something that could be anywhere? MHK can design what you Want! Just set the bar!

With the Hoffman name appearing on building after building, it is beginning to feel less like Naples and more like "Hoffman Town." Regardless of the company involved, I don't believe any one developer's name should come to dominate the visual identity of an entire downtown.

There also seems to be less public art and fewer of the unique touches that once made downtown interesting. There used to be more art scattered throughout Cambier Park, Fifth Avenue South, and Third Street South. There were more interesting and independent shops. There was more character.

I worry that Naples is gradually losing the everyday person.

Beautification seems heavily concentrated on Fifth Avenue South, while other parts of downtown can feel neglected, bland, and drab. And then there are the potholes. So many potholes.

I have personally seen equipment fall out of a truck when they hit a pothole downtown! That was a shock!

Florida is generally known for having relatively great roads, yet our downtown streets seem to be in worse condition than roads in New England that have to endure snow and plowing.

The rotary areas are another example. They look bare and drab when they could instead be beautiful gateways that reflect the beauty of Naples. Look at the landscaping at some of our communities. Gorgeous Not here

And then there is Cambier Park.

I watched children crying when the playground was torn apart right in front of them during the Thanksgiving holiday. Nearly a year later, people are still asking what is happening and when will the project actually be completed. Seems that is being pushed back too… 5th Ave must need the money??? There have been open holes that have been dug out with orange cones on top, sitting for months with seemingly No visible progress. I walk my dogs around Cambier and for 4 days there was a used condom on the sidewalk across from Captain & Crew and the cigar shop. No one picked it up. No workers actually walk around the park and keep track of anything. It truly seems like no one cares anymore…

Where is the planning?

Who is coordinating all of this? Is there a Leader??????

Who is looking at the city as a whole rather than approving individual projects one at a time?

Where do these commissioners live? Anywhere near downtown?

It sometimes feels as though residents can attend meeting after meeting, raise concern after concern, and express the same frustrations repeatedly, yet the direction of the city continues unchanged.

Naples is valuable because of its character, beauty, scale, history, landscaping, architecture, public spaces, art, and sense of community. Those things should not be treated as obstacles to development. They should be the Foundation upon which development is built.

Growth does not have to mean losing what made Naples special.

Please listen to the people who live here, work here, and experience downtown every day. Please look beyond individual development projects and consider what the cumulative effect is doing to the character of Naples.

We can do better.

You can have all the meetings you want, but meetings only matter if the concerns expressed in them actually influence decisions.

I sincerely hope the people making these decisions will stop, look at what is happening to

downtown, and ask a simple question:

What do we want Naples to look and feel like ten, twenty, or thirty years from now?

OMG — doesn't anyone see what is happening?

Because once the character of a place is gone, it is gone…

Good luck Thanks for listening.. Naples hopeful :)

Barbara J. Rudd
Naples Diamond Realty
D: (239) 961.0775
EM: Naplesdiamondrealty@gmail.com

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Bob Bernardi (Old Naples resident)

Date sent: August 14, 2026

NAPLES 2045 COMPREHENSIVE PLAN UPDATE - COMMENT FORMS

Submission Date	Name	Address	Email	Do you reside or own a business in the City of Naples?	Other:	Please select which neighborhood you reside in or own a business:	Other:	Please select the topic you would like to comment on. Once you have selected the topic, please type your comments in the box shown below:	Comments:	Notes:
Aug 14, 2026	Bob Bernardi	600 5th Avenue South	bob.bernardi@comcast.net	Resident		Old Naples		Noise control	Downtown Old Naples is excessively loud from loud car/truck/motorcycle mufflers, speeding bursts, cars left in 1st gear so engines rev loudly. There's little enforcement or attention paid to the issue. Hardly 'small town charm and peacefulness'.	

Rene Lewin (Miracle Mile)

Date sent: August 17, 2026

From:	Rene Lewin
To:	Bob Meier, Port Royal; Bruce Robin; Cliff Holland; Dan Barone - Sun Terrace President; Deb Bowen; Doug Haughey; GSPOA President (gspoanaples@gmail.com); Helen McGrath; jafdjf@aol.com; James Whittaker; Jamie Gibbs c/o Jenna Heiderman; Joe Murray - Royal Harbor (President@royalharbornaples.org); Maegan Evans; Mary Young; Mike Faucett; Mike Shields; Mike Stoots - Village Green; Nancy Walkenhorst; Patrick Wack; president@gsacnaples.com; Sally Mainquist, Royal Harbor VP; seagatepoa@gmail.com; Steve Barrett, Naples Cay; Sun Terrace Assn (melanie@gcipnaples.com); Monique Barnhart
Cc:	Gary Young; Erica Martin
Subject:	Re: Naples 2045 Comprehensive Plan Update - Extended Public Review Draft
Date:	Monday, August 17, 2026 4:36:00 PM
Attachments:	image001.png

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Hi Monique. I have sent your email to my Miracle Mile Board. Please recall that nearly 500 residents along the Miracle Mile participated in our neighborhood survey and the survey results was given to the Comprehensive Plan team . The survey responses were similar to the questions in the Comp Plan . I do not know if the Comprehensive Plan team used the information and survey results .

Rene
908-625-5544

On Wednesday, August 12, 2026 at 04:34:22 PM EDT, Monique Barnhart <mbarnhart@naplesgov.com> wrote:

Good afternoon, Presidents Council,

Please be advised that the Extended Public Review Draft of the Naples 2045 Comprehensive Plan Update is now available on the Naples2045.com website.

Please see the email below from Planning Director Erica Martin for additional information and links to the draft Plan.

Please let me know if you have any questions.

Best,

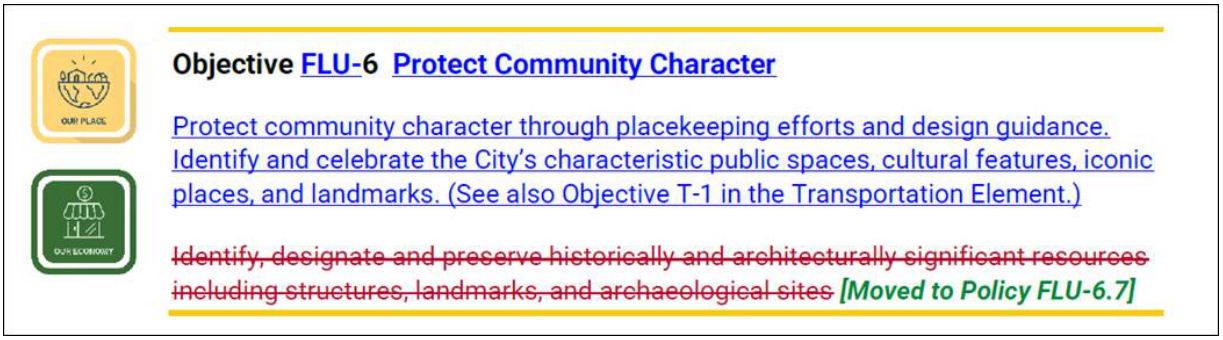
Monique Barnhart-Tiberio
Communications and Public Outreach Manager
Public Information Officer

City of Naples
735 8th Street South, Naples, FL 34102
mbarnhart@naplesgov.com
Office: (239) 213-1001 | Mobile: (239) 571-9426

From: Erica Martin <emartin@naplesgov.com>
Sent: Wednesday, August 12, 2026 2:45 PM
To: Erica Martin <emartin@naplesgov.com>
Cc: Gary Young <GYoung@naplesgov.com>; Monique Barnhart <mbarnhart@naplesgov.com>
Subject: Naples 2045 Comprehensive Plan Update - Extended Public Review Draft

Good afternoon,

Following City Council's decision in June to extend the project schedule for the Comprehensive Plan Update (Naples 2045) to allow the public additional time to review the draft and provide feedback on the Plan, staff requested that the consultant provide a supplemental version of the draft in which they include notations within the text depicting where language has moved to and/or from (in instances where language was neither added nor removed, but simply relocated within the Plan). An example is provided below (the green caption indicates that this language was not removed from the Plan, but was relocated to Policy FLU-6.7 elsewhere in the Plan):



Objective FLU-6 Protect Community Character

Protect community character through placekeeping efforts and design guidance. Identify and celebrate the City's characteristic public spaces, cultural features, iconic places, and landmarks. (See also Objective T-1 in the Transportation Element.)

~~Identify, designate and preserve historically and architecturally significant resources including structures, landmarks, and archaeological sites~~ ***[Moved to Policy FLU-6.7]***

This is the only change in this version of the draft Plan; no changes were made to the content or language in the previously published draft. The intent of this additional draft is to aide in the review of the amended plan by making it more clear to the reader when language is new, removed, or relocated.

This amended version has been published on the Naples2045 website

https://www.naples2045.com/ (a link to which is provided on the City of Naples website homepage) and is available here: Extended Public Review Draft

The City's Communications and Public Outreach Manager will also send emails to the Presidents' Council, subscribers to the City's electronic newsletter, and those who have registered for updates on the Naples2045 website informing them of the amended draft and providing information on how to access the document.

Thank you,

Erica J. Martin
Planning Director
City of Naples
295 Riverside Circle, Naples, FL 34102
emartin@naplesgov.com
Office: (239) 213-1050 | Mobile: (239) 227-4377

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Gregory B. Myers

Date sent: August 18, 2026

From:	gregbmyers@verizon.net
To:	MayorHeitmann; Council; Gary Young; Erica Martin; Matthew McConnell; Pat Rambosk
Cc:	Christopher Ranson; gregbmyers@verizon.net
Subject:	Fw: Naples 2045 Comprehensive Plan Update: View the Latest Draft
Date:	Tuesday, August 18, 2026 3:11:09 PM
Attachments:	19230907_PLAN OF NAPLES_PB1 PG 8.pdf 19540405_City of Naples Ordinance 413.pdf 19540408_COQUINA SANDS UNIT 1_PB 3 PG 21-22.pdf 20180103_ALTA Survey_Gulf Street.pdf 20201006_THE NAPLES BEACH CLUB_PB 68 PG 52.pdf 20220217_Dagostino Affidavit.pdf 20200526_Plat Opinion_THE NAPLES BEACH CLUB.pdf

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Subject: 2045 Comprehensive Plan Draft — Gulf Street, Beach Ownership, Public Access, and Coastal Jurisdiction

Mayor and Council:

I want to focus on one concrete issue that exposes several fundamental deficiencies in the proposed 2045 Comprehensive Plan: **Gulf Street and the City's treatment of the beach.**

Gulf Street is shown on the recorded **Plan of Naples, Plat Book 1, Page 8**, as a 60-foot north-south street running along the Gulf of Mexico. The Plan of Naples also established the east-west avenues connecting the interior street grid to Gulf Street. In other words, Gulf Street was the western spine of an integrated street and waterfront-access system.

The avenues did not "lead nowhere." They led to Gulf Street. And Gulf Street did not lead nowhere. It ran along the navigable Gulf of Mexico.

Yet the proposed 2045 Comprehensive Plan does not show Gulf Street on any map and, as far as I can determine, does not identify or discuss it anywhere in the text. That omission needs to be corrected.

The City's own records have repeatedly recognized Gulf Street. The City's subdivision regulations expressly refer to **"Gulf Street (according to plat of the Plan of Naples)."** Ordinance 413 repeatedly uses Gulf Street as a legally operative boundary. The recorded Coquina Sands plat repeatedly depicts Gulf Street. Former City Clerk Tara Norman confirmed from City records that Gulf Street had never been vacated. And the surveyor of record for **The Naples Beach Club, Plat Book 68, Pages 52–56**, later swore that Gulf Street "has always been a public road."

The Naples Beach Club's 2019 ALTA survey also depicted Gulf Street. Gulf Street is not depicted on **The Naples Beach Club, Plat Book 68, Pages 52–56**, even though that plat expressly replats portions of several earlier recorded subdivisions that form part of the historical street framework. The May 26, 2020 Plat Opinion submitted to City Council in connection with approval of Plat Book 68, Pages 52–56 likewise reviewed historical plats, ordinances, dedications, easements, and other title materials.

That history is important to the 2045 Comprehensive Plan because it demonstrates that Gulf Street and the surrounding street architecture are not obscure or newly discovered features. They are part of the City's recorded land-use history and should be accurately addressed in the City's long-range planning documents.

This is not a minor drafting oversight or an obscure title issue that a professional planning team could reasonably be expected to miss. Gulf Street is shown on the recorded Plan of Naples; it is recognized in the City's own subdivision regulations; it appears in later recorded plats, ordinances, surveys, and title materials; and it bears directly on public access, transportation, coastal management, property rights, and development along the City's most important shoreline.

A professional planner preparing a comprehensive plan for Naples should identify and address that legal

geography as a matter of basic due diligence.

The complete omission of Gulf Street from both the text and map series therefore raises a serious question about the adequacy, independence, and completeness of the planning process.

The omission is particularly difficult to understand because the Draft devotes substantial attention to generalized concepts such as beach access, coastal resilience, transportation, property rights, and "placekeeping," while failing to identify a recorded 60-foot waterfront street that directly implicates every one of those subjects. That is not the kind of omission that should survive competent professional review.

Council should require the Planning Department and its consultants to explain, on the record, what title, survey, plat, and legal materials they reviewed concerning Gulf Street before concluding that it warranted **no recognition whatsoever** in the 2045 Plan.

There is a second and related problem: the Draft repeatedly uses the word **"beach"** as though all sand along the Gulf constituted one homogeneous legal category. It does not.

At the Naples Beach Club property, the recorded **Erosion Control Line ("ECL")** is the western boundary of the upland ownership. Under Florida law, lands seaward of an established ECL are State-owned. The modern survey and plat materials themselves depict the ECL and the various coastal regulatory lines.

But portions of that State-owned dry sand also encompass **Gulf Street**, a separate 60-foot recorded public right-of-way. Thus, the same physical area can involve several legally distinct interests:

- the State's fee ownership;
- public-use rights arising from the dedication of Gulf Street;
- private property rights arising from recorded plats, easements, and chains of title;
- coastal regulatory jurisdiction;
- municipal police and planning authority; and
- maintenance, permitting, enforcement, and management responsibilities assigned to different governmental entities.

The proposed Comprehensive Plan explains virtually none of this.

That becomes a real problem when the Draft contains directives such as **"restrict motorized vehicles on beaches."**

Which "beach"?

Does that mean ordinary State-owned beach outside the Gulf Street right-of-way?

Does it include the 60-foot Gulf Street corridor merely because Gulf Street presently has sand on top of it?

Does calling Gulf Street "beach" somehow change its legal status as an unvacated public street?

Who regulates travel within Gulf Street—the State, the City, Collier County, or some combination of them?

Who is responsible for keeping public access unobstructed?

Who has authority to authorize commercial or private uses on State-owned land seaward of the ECL?

Those are not academic questions. The Comprehensive Plan is supposed to establish **meaningful and predictable standards** for governmental decision-making. It should not use an undefined physical term —"beach"—in a way that obscures materially different ownership interests, rights-of-way, easements, jurisdictions, and governmental responsibilities.

The Coastal Management Element should therefore identify and distinguish, at minimum:

1. **State-owned lands seaward of recorded Erosion Control Lines;**
2. **City-owned and County-owned shoreline property, if any;**
3. **recorded public streets and rights-of-way within the shoreline area, including Gulf Street;**
4. **the east-west avenues and beach approaches connecting to Gulf Street;**
5. **public beach-access easements and dedications;**
6. **the Coastal Construction Control Line and other material State coastal regulatory lines;**
7. **the existence and legal significance of recorded private property rights affecting public-access corridors;** and
8. **the respective ownership, regulatory, permitting, maintenance, access-protection, and enforcement responsibilities of the State of Florida, DEP, Collier County, and the City of Naples.**

The Comprehensive Plan does not need to become a title insurance commitment. But neither should it depict legally significant land, streets, rights-of-way, and public-access corridors as though they do not exist.

This is particularly important because Florida's growth-management statutes require the Comprehensive Plan to be based upon relevant data and analysis, to contain internally consistent elements, to address the existing transportation system and coastal resources, and to recognize property rights. The required Property Rights Element expressly recognizes interests in property **"including easements."** The Coastal Management Element addresses coastal uses and public access. The Transportation Element addresses the existing transportation system.

Gulf Street implicates all three.

The fact that the City may not own the underlying fee is irrelevant to whether Gulf Street belongs in the Comprehensive Plan. The Comprehensive Plan is not an inventory of City-owned real estate. It is the governing land-use and transportation document for the City. State highways, County roads, utility corridors, public easements, and other transportation facilities do not disappear from a municipal Comprehensive Plan simply because the municipality does not hold fee-simple title to the underlying land.

The Draft should therefore expressly recognize Gulf Street and depict the entire 60-foot corridor on the appropriate Comprehensive Plan map or map series.

I suggest language along these lines:

"Gulf Street. The City recognizes Gulf Street, as depicted on the Plan of Naples recorded in Plat Book 1, Page 8, as an existing sixty-foot public right-of-way extending north-south along the Gulf of Mexico and forming part of the historic Plan-of-Naples street and waterfront-access network. Gulf Street shall be depicted on the applicable Comprehensive Plan maps. The physical presence of sand, dunes, vegetation, or beach conditions within the Gulf Street corridor shall not be construed to vacate, extinguish, abandon, reclassify, or diminish the legal status of Gulf Street or any existing public or private right arising from the Plan of Naples."

The Plan should also contain a broader provision:

"Beach and Shoreline Legal Framework. The City's Gulf shoreline consists of lands subject to differing fee ownership, public-use rights, private property interests, dedications, easements, rights-of-way, and governmental jurisdictions. The Comprehensive Plan shall distinguish those interests where material to land use, transportation, coastal management, public access, or development review. The physical designation of land as 'beach,' 'dune,' or 'shoreline' shall not alter or obscure the legal status of an underlying street, right-of-way, easement, dedication, or other property interest."

And finally:

"Intergovernmental Responsibilities. The City shall identify the respective ownership, regulatory, permitting, maintenance, public-access protection, and enforcement responsibilities of the State of Florida, Florida Department of Environmental Protection, Collier County, and the City for lands within the City's beach and shoreline area."

There is a broader problem here.

The beach is Naples's defining natural, recreational, economic, historical, and civic resource. It is one of the principal reasons people choose to visit, live, and invest here. Yet the proposed Comprehensive Plan says remarkably little about **who owns the beach, what recorded rights exist within it, who regulates it, who maintains it, who may authorize private or commercial uses of it, and how those responsibilities change from one portion of the shoreline to another.**

That is not sufficient for the City's principal governing land-use document.

If the Comprehensive Plan is going to regulate **"the beach,"** it first needs to tell the public what "the beach" legally consists of.

And if the City knows Gulf Street exists, knows that it has never been vacated, knows that it forms the western spine of the Plan-of-Naples street system, and knows that public and private rights remain associated with it, then Gulf Street cannot simply disappear from the City's 2045 planning maps.

A professional planning process should not produce a governing map that is less complete than the recorded plats, surveys, ordinances, and title materials already in the City's possession.

Please direct the Planning Department and the City's consultants to address these issues expressly, and on the record, before this Draft advances further.

For ease of reference, I have attached a limited set of representative documents illustrating the historical and present-day record concerning Gulf Street. These attachments are not intended to be exhaustive.

Attachments:

1. Plan of Naples, Plat Book 1, Page 8
2. Coquina Sands Unit No. 1, Plat Book 3, Pages 21–22
3. City of Naples Ordinance No. 413
4. 2019 ALTA Survey depicting Gulf Street
5. The Naples Beach Club, Plat Book 68, Pages 52–56
6. Relevant excerpts from the Affidavit of David S. Dagostino, surveyor of record for Plat Book 68, Pages 52–56, including his sworn statement that Gulf Street "has always been a public road"
7. May 26, 2020 Plat Opinion of G. Helen Athan, addressed to Naples City Council and submitted in connection with Council's consideration of Plat Book 68, Pages 52–56

Sincerely,

Gregory B. Myers

----- Forwarded Message -----
From: City of Naples <monique@cityofnaples.ccsend.com>
To: "gregbmyers@verizon.net" <gregbmyers@verizon.net>
Sent: Wednesday, August 12, 2026 at 04:31:23 PM EDT
Subject: Naples 2045 Comprehensive Plan Update: View the Latest Draft

View as Webpage

View The Latest Naples 2045 Draft Plan

Following discussions at the Planning Advisory Board and City Council meetings in May and June, City Council extended the public review period for the Naples 2045 Comprehensive Plan Update to provide additional time for the community to review the draft Plan and provide feedback. Comments may be submitted by email to Erica Martin, Director of Planning, at emartin@naplesgov.com, by October 23, 2026.

About the Extended Public Review Draft

The latest version of the draft Plan includes supplemental notations to help readers more easily identify where language has been added, removed, or relocated within the Plan. **No changes have been made to the content or language of the previously published draft.** The notations are intended to make the draft easier to review and understand as the community continues to provide input on the Comprehensive Plan Update.

View the Extended Public Review Draft



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Callhan Soldavini (Lake Park resident)

Date sent: September 4, 2026

From: Kristina Majeski
To: Erica Martin
Subject: FW: Naples 2045 Comprehensive Plan
Date: Tuesday, September 8, 2026 8:58:31 AM
Attachments: image001.png

Good morning, Erica,

This email was sent to Council regarding Comp Plan, forwarding if needed.

Thank you.

Best,

Kristina Majeski
Administrative Manager
City Manager's Office
735 8th Street South, Naples, FL 34102
kmajeski@naplesgov.com
www.naplesgov.com
Office: (239) 213-1022

From: Callhan Soldavini <callhansoldavini@gmail.com>
Sent: Friday, September 4, 2026 4:33 PM
To: Council <Council@naplesgov.com>
Subject: Naples 2045 Comprehensive Plan

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Dear Mayor and City Council,

I am a City of Naples resident in Lake Park. I grew up in Naples and am now lucky enough to be raising my own family here. I love our beautiful beaches, restaurants, shops, and yes, even the luxury that has become part of Naples' identity. But one of my favorite things about raising children here is much simpler: our community special events.

Naples is a small town, and these events make it vibrant, connected, and family-

friendly. Naples Pride Fest, India Fest, the MLK Jr. Parade and Celebration, Juneteenth, Chanukah celebrations, Empty Bowls, art festivals, Christmas events, Festival Under the Stars, and so many others expose our children to different cultures, traditions, art, music, history, and people right here at home.

As a parent, it is such a treat to load the kids onto our bikes, ride from Lake Park to Cambier Park or another City space, and find something completely different for them to experience. I want my children to experience the diversity of the world here in their hometown, not only when we travel.

That is why I was happy to see the Naples 2045 Comprehensive Plan recognize “diverse special events” as one of the things that makes Naples special. The Plan appropriately considers their impact on residents, but residents also benefit from these events. Our families attend them, our children learn from them, and our nonprofits raise critical funds through them that are poured right back into our community.

I hope Naples 2045 will include a commitment to supporting and preserving diverse special events and providing reasonable opportunities for nonprofit, charitable, cultural, and community organizations to host them. We are already watching events struggle to remain in the City, with some moving to surrounding areas because it has become too difficult or expensive to stay.
Specific fees and permitting procedures do not belong in a Comprehensive Plan, but the principle of protecting these events does. If costs and other barriers continue to rise, we risk losing even more of the events that make Naples such a vibrant community.

Please ensure Naples 2045 supports measures to protect diverse special events, including keeping permitting requirements and costs reasonable so they do not become barriers for the organizations working to keep these events in our City.

Thank you for your consideration,
Callhan Soldavini
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HOA Coalition

Dates sent: September 30, 2026; October 23, 2026

Christine M. Fisher

From: Erica Martin <emartin@naplesgov.com>
Sent: Thursday, October 1, 2026 10:44 AM
To: Christine M. Fisher; Laura DeJohn
Subject: [EXT] FW: ASA September Newsletter

CAUTION

FYI

Thank you,

Erica J. Martin
Planning Director
City of Naples
295 Riverside Circle, Naples, FL 34102
emartin@naplesgov.com
Office: (239) 213-1050 | Mobile: (239) 227-4377

From: Monique Barnhart <mbarnhart@naplesgov.com>
Sent: Thursday, October 1, 2026 9:23 AM
To: Erica Martin <emartin@naplesgov.com>; Gary Young <GYoung@naplesgov.com>
Subject: FW: ASA September Newsletter

Provided FYI

The Coalition has created their own vision and definitions for the Comp Plan. They are listed at the very bottom of the email.

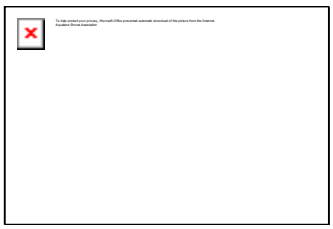
Monique Barnhart-Tiberio
Communications and Public Outreach Manager
Public Information Officer
City of Naples
735 8th Street South, Naples, FL 34102
mbarnhart@naplesgov.com
Office: (239) 213-1001 | Mobile: (239) 571-9426

From: Aqualane Shores Association <admin@aqualaneshores.org>
Sent: Wednesday, September 30, 2026 7:12 PM
To: Monique Barnhart <mbarnhart@naplesgov.com>
Subject: ASA September Newsletter

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ASA September Newsletter



ASA Community Newsletter

AQUALANE SHORES * COQUINA SANDS * GULF SHORE
ASSOCIATION OF CONDOMINIUMS * THE MOORINGS
PARK SHORE * PORT ROYAL * ROYAL HARBOR * SUN TERRACE

HOA COALITION UPDATE — VOLUME 2

A Vision for Naples' Future

As shared in our first newsletter, the HOA Coalition brings together eight Naples neighborhood associations representing nearly 75 percent of City residents.

We continue to work collaboratively to review the City's draft Comprehensive Plan—the long-term blueprint guiding decisions on land use, infrastructure, resiliency, redevelopment, environmental protection and future growth. While each neighborhood has its own history and priorities, we share a common interest in ensuring that the Plan reflects the Naples of today while providing a thoughtful framework for the Naples of tomorrow.

Because this document will guide Naples for decades, we believe it deserves meaningful resident participation. We've been meeting weekly to review the draft Plan element by element, looking for areas where language could be clearer, more objective, forward-looking and more representative of the broader community.
One of the Coalition's first priorities was the Vision Statement, because it establishes the overarching direction for the Comprehensive Plan and should guide the goals, objectives and policies that follow.

We developed an updated Vision that we believe better reflects the Naples of today and the community we aspire to be. It recognizes the qualities residents deeply value—our natural environment, distinct neighborhoods, exceptional quality of life and strong sense of community—while acknowledging an equally important part of Naples' history: this has always been a community of thoughtful renewal and evolution.
The Naples we enjoy today is the product of generations of change, investment and renewal. Homes and neighborhoods have evolved, businesses and institutions have grown, and new generations of residents have contributed to our community. This renewal is guided by thoughtful building codes and responsible growth.

We believe the Comprehensive Plan should recognize this history of continuous renewal while protecting the qualities that make Naples exceptional. That philosophy guided not only our proposed Vision Statement, but our review of the Comprehensive Plan as a whole.

Our review also identified several terms used repeatedly throughout the draft, including "Green Jewel," "Small Town Charm," and "Character." While these phrases are intended to describe qualities residents value, they are inherently subjective. Without clear definitions, such terms can mean different things to different residents, City staff and future decision-makers. Rather than eliminate these concepts, the Coalition developed proposed definitions intended to better reflect the shared values of Naples' broader residential community.

We believe the Comprehensive Plan should not describe an idealized past. It should address challenges and help us responsibly shape the Naples we leave for the next generation.

We Want to Hear From You

The Coalition's proposed Vision Statement and definitions of Green Jewel, Small Town Charm and Character are being shared with residents of our eight member communities for review and comment.

We welcome your thoughts and encourage you to participate. Please send comments, suggestions or questions to: CompPlanHOA@gmail.com. Your feedback will help inform the Coalition's recommendations as we work toward a Comprehensive Plan that protects what makes Naples special while thoughtfully preparing our community for the future.

Sincerely,

Leadership of the HOA Coalition:
Bruce Robin, Aqualane Shores
Maegan Dustin, Coquina Sands
Helen McGrath, Gulf Shore Association of Condominiums
Cliff Holland, The Moorings
Nancy Walkenhorst, Park Shore
Bob Meier, Port Royal
Joseph Murray, Royal Harbor
Nick Zimmerman, Sun Terrace

CURRENT CITY PROPOSED VISION STATEMENT:

The enduring character of Naples reflects our commitment to protect and enhance the natural environment, and to preserve our small town feel and charm. These features, together with a positive business climate, sustain economic vitality. Residents place a high value on our town's unique "sense of place", natural beauty, quality of life, healthy economy, and ethical government; and actively engage and defend them.

HOA COALITION PROPOSED/RECOMMENDED VISION STATEMENT:

Naples is a vibrant and sophisticated coastal community distinguished by its exceptional quality of life, natural beauty and beaches, safety and security, distinct neighborhoods, healthy economy, small-town charm, and unique sense of place. As Naples continues to evolve and renew, it will protect these defining qualities while embracing thoughtful change, respecting individual property rights, and preparing for the needs of future generations. Naples will continue to strengthen community resiliency, protect and enhance its natural resources, and modernize essential infrastructure. Through responsible stewardship and collaboration with local, state, and regional partners, Naples will embrace opportunities to improve mobility, expand workforce housing, adapt to a changing coastal environment, and remain a resilient, thriving community for generations to come.

HOA COALITION PROPOSED/RECOMMENDED DEFINITIONS:

GREEN JEWEL

The Green Jewel is a guiding community vision for Naples to preserve and enhance its distinctive green character as the City evolves. It recognizes the City's trees, landscaping, parks, open spaces, natural areas, waterways, and other environmental resources as elements of Naples' identity, sense of place, quality of life, and long-term resilience.

CHARACTER

A city's character refers to distinct look and feel of an area shaped by the following: its physical features, land use, architecture, streetscapes, natural elements, neighborhoods, lifestyle, buildings, community activities that create a unique sense of place.

SMALL-TOWN CHARM

Naples' Small-town charm comes from the welcoming, safe, walkable residential neighborhoods and shopping districts enhancing the quality of life through a resilient, environmentally balanced approach. The term recognizes these valued qualities while allowing Naples to thoughtfully grow, continuously renew, and evolve in ways that enhance its character and quality of life.

Aqualane Shores Association, P O Box 1724, Naples, FL 34108, United States

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HOA COALITION COMPREHENSIVE PLAN REVIEW

Preliminary Findings & Recommendations
October 23, 2026

Purpose

The HOA Coalition undertook a comprehensive review of the City of Naples Draft Comprehensive Plan with the goal of providing a coordinated residential perspective on the City's long-range planning framework. Since June, Coalition representatives have met on a near-weekly basis to review the Draft element by element, examining its goals, objectives and policies through the perspectives, experiences and priorities of our respective communities, while also considering the needs of Naples as a whole. Given the magnitude and long-term importance of the Comprehensive Plan, our review focused on identifying common themes, areas requiring greater clarity or community input, and opportunities to ensure the final Plan provides a forward-looking, actionable and implementable framework for Naples over the coming decades.

To broaden awareness and encourage resident participation, the Coalition established a newsletter that was distributed throughout each of our member communities to provide updates on our efforts, share our collective work and invite feedback, questions and comments. We also created a dedicated email address through which residents could participate directly in the process, providing Coalition leadership with an ongoing opportunity to hear from and engage with the residents we represent.

This outreach was intended to make the Coalition's work an open and collaborative process, not simply a review conducted by association leadership. By sharing updates and inviting input across member communities, the Coalition sought to identify both common citywide concerns and issues that may be experienced differently from one neighborhood to another. The perspectives received helped inform our discussions and reinforced the importance of providing residents with meaningful opportunities to participate in decisions that will shape Naples for decades.

Our approach has been deliberately constructive. We recognize the substantial work undertaken by City staff, the Planning Advisory Board, consultants, and other participants in preparing the Draft. The Coalition does not seek to revisit every policy or suggest changes for their own sake. Instead, we have focused on targeted recommendations that strengthen clarity, consistency, coordination, and implementation while respecting the City's broader planning responsibilities.

The Coalition believes the Comprehensive Plan should both protect the qualities that make Naples exceptional and recognize that Naples is not a static community. Throughout its history, the City has continuously renewed and evolved in response to changing demographics, environmental conditions, infrastructure needs, technology, transportation patterns and community expectations. The Plan should provide a framework that allows Naples to continue that thoughtful evolution while preserving the fundamental qualities residents value.

The Coalition understands that the City is not required to complete its next state-mandated Comprehensive Plan evaluation and update until 2032, and we appreciate the City's decision to provide additional time for review and public input. Given the long-term significance of this document, we believe this extended timeframe presents an important opportunity to ensure the final Plan is as thoughtful, comprehensive and effective as possible.

The Coalition encourages the City to further consider important and critical engagements of Collier County and other governmental and regional partners, deeper evaluation of significant issues such as resiliency, aging infrastructure, transportation and mobility, and an opportunity to refine policies so they are not only aspirational or reflective of the Naples of the past, but actionable and implementable. The goal should be a Comprehensive Plan that reflects broad community input and provides a clear, practical framework for Naples' future.

1. Establish a Clear, Forward-Looking Vision

The Vision Statement should serve as the foundation for the Comprehensive Plan, with the individual elements, goals, objectives and policies collectively advancing that Vision.

The Coalition's review concluded that the proposed Vision should more clearly acknowledge Naples as a dynamic community that has evolved through generations of thoughtful renewal. Protecting Naples' quality of life and distinctive character should not be interpreted as preserving the City unchanged. Rather, the Plan should balance preservation with responsible growth, renewal, modernization and preparation for emerging challenges.

For this reason, the Coalition developed an alternative Vision Statement intended to better articulate a Naples that protects its natural environment and distinctive communities while remaining resilient, vibrant, forward-looking and prepared for the future.

HOA Coalition Proposed/Recommended Vision Statement:

> Naples is a vibrant and sophisticated coastal community distinguished by its exceptional quality of life, natural beauty and beaches, safety and security, distinct neighborhoods, healthy economy, small-town charm, and unique sense of place. As Naples continues to evolve and renew, it will protect these defining qualities while embracing thoughtful change, respecting individual property rights, and preparing for the needs of future generations.
>
> Naples will continue to strengthen community resiliency, protect and enhance its natural resources, and modernize essential infrastructure. Through responsible stewardship and collaboration with local, state, and regional partners, Naples will embrace opportunities to improve mobility, expand workforce housing, adapt to a changing coastal environment, and remain a resilient, thriving community for generations to come.

2. Clearly Define Recurring Terminology

Terms such as "character," "small-town charm," and "Green Jewel" appear throughout the Comprehensive Plan and influence numerous goals and policies. Yet these terms are inherently subjective unless their intended meaning is clearly established.

The Coalition does not believe these concepts should necessarily be abandoned. To the contrary, they represent qualities that many residents strongly value. However, terminology used to guide long-range public policy should have sufficient clarity that residents, elected officials, staff and future decision-makers share a reasonable understanding of what the Plan intends to protect or accomplish.

The Coalition therefore developed proposed definitions intended to preserve the value of these concepts while providing greater clarity, objectivity and consistency throughout the Plan.

Proposed/Recommended Definitions:

GREEN JEWEL

The Green Jewel is a guiding community vision for Naples to preserve and enhance its distinctive green character as the City evolves. It recognizes the City's trees, landscaping, parks, open spaces, natural areas, waterways, and other environmental resources as elements of Naples' identity, sense of place, quality of life, and long-term resilience.

CHARACTER

A city's character refers to distinct look and feel of an area shaped by the following: its physical features, land use, architecture, streetscapes, natural elements, neighborhoods, lifestyle, buildings, community activities that create a unique sense of place.

SMALL-TOWN CHARM

Naples' Small-town charm comes from the welcoming, safe, walkable residential neighborhoods and shopping districts enhancing the quality of life through a resilient, environmentally balanced approach. The term recognizes these valued qualities while allowing Naples to thoughtfully grow, continuously renew, and evolve in ways that enhance its character and quality of life.

3. Better Incorporate Naples' Communities and Regional Partners

Naples is a city of distinct neighborhoods, each with different physical characteristics, infrastructure needs, vulnerabilities and priorities. The Coalition believes these neighborhood perspectives should be more clearly reflected in the Comprehensive Plan and in its implementation.

Similarly, many of the City's most significant long-term challenges do not stop at municipal boundaries. Transportation, water management, resiliency, environmental protection, beaches, workforce housing,

emergency planning and infrastructure increasingly require coordination with Collier County, state agencies and other regional partners.

The final Plan should therefore place greater emphasis on neighborhood-level planning and meaningful intergovernmental coordination, including clearly identifying opportunities for joint planning, information sharing and implementation.

4. Move from Aspirational Resiliency to Actionable Resiliency

Resiliency emerged as one of the Coalition's strongest recurring themes.

Naples faces significant long-term challenges associated with flooding, stormwater management, coastal vulnerability, aging infrastructure, utilities, beach protection and recovery from major storm events. These challenges are interconnected and require long-term planning and investment.

The Coalition supports making resiliency a central principle of the Comprehensive Plan. However, the Plan will be most effective if resiliency is translated from a broad aspiration into specific and implementable objectives and policies. Particular emphasis should be placed on the long-term protection and restoration of Naples' beaches and coastal resources, recognizing their critical importance to the City's environmental health, economic vitality, storm protection, and overall quality of life.

Where appropriate, resiliency policies should identify priorities, responsible departments or governmental partners, planning mechanisms, capital needs, timelines or milestones, and measurable indicators of progress. The Comprehensive Plan could also connect resiliency objectives directly to the City's Capital Improvement Program and other implementation documents so that long-range policy informs actual investment decisions.

5. Address Aging Infrastructure as a Citywide Planning Priority

Infrastructure is fundamental to nearly every element of the Comprehensive Plan. Naples must simultaneously maintain existing systems, modernize aging infrastructure and prepare those systems for future environmental and community needs.

The Coalition recommends that the Plan more clearly recognize infrastructure renewal as a long-term strategic priority and establish stronger connections among infrastructure planning, resiliency, capital investment and neighborhood needs.

This should include stormwater, water and wastewater systems, streets and rights-of-way, utilities and other critical public infrastructure.

6. Strengthen Transportation and Mobility Planning

Transportation and mobility concerns extend beyond traffic volume alone. The Coalition believes the Plan should address the City's transportation system comprehensively, including vehicular traffic, pedestrian and

bicycle mobility, safety, connectivity, parking, evacuation needs and the cumulative impact of development and redevelopment.

Because much of Naples' transportation network connects directly to County and State systems, transportation planning also illustrates the importance of stronger intergovernmental coordination.

7. Make Intergovernmental Coordination an Operating Principle

Many of Naples' greatest challenges cannot be effectively addressed by the City acting alone.

The Coalition recommends strengthening intergovernmental coordination throughout the Comprehensive Plan rather than treating it principally as a stand-alone element. Where implementation of a policy depends upon Collier County, FDOT, the South Florida Water Management District, state agencies or utility groups, that relationship should be clearly identified.

The Plan should establish a framework for ongoing liaison, joint planning and regular communication on issues of shared importance.

8. Emphasize Implementation and Accountability

The Coalition's overarching recommendation is that the final Comprehensive Plan function not simply as a statement of aspirations, but as a practical framework for decision-making and implementation.

Greater use of implementation mechanisms, responsible parties, measurable benchmarks and connections to the Capital Improvement Program would make the Plan significantly more useful to future Councils, staff and residents.

9. Connect the Elements Through a Consistent Implementation Framework

One of the clearest findings of the Coalition's element-by-element review is that the City's priorities are closely interrelated. Land use decisions affect drainage, transportation, housing, public facilities, and neighborhood conditions. Coastal management and resiliency depend on infrastructure investment and intergovernmental partnerships. Capital planning, in turn, determines whether long-range objectives can be translated into practical improvements. The Coalition therefore encourages the City to examine the final Plan as an integrated whole, reconcile overlapping or inconsistent policies, and ensure that related elements reinforce rather than operate independently of one another.

10. Establish a Practical Path from Adoption to Implementation

The value of this review should extend beyond the adoption of a final document. The Coalition recommends that the City identify opportunities to connect major policy commitments to existing planning and budget processes, including the Five-Year Capital Improvements Program, master plans, departmental work programs, and coordination with regional partners. Where appropriate, implementation should include clear responsibilities, realistic sequencing, opportunities for public engagement, and periodic reporting on

progress. These measures need not create an additional layer of bureaucracy; rather, they should help residents and decision-makers understand how adopted priorities are being advanced over time.

The Coalition further encourages the City to establish ongoing opportunities for meaningful engagement with neighborhood associations and residents as major Comprehensive Plan initiatives are developed and implemented, ensuring that community perspectives continue to inform decisions beyond the Plan's adoption.

11. Recognize Workforce Housing as a Critical Community and Economic Priority

The Coalition believes workforce housing is essential to Naples' long-term economic vitality, community sustainability, and quality of life. The increasing difficulty of attracting and retaining teachers, first responders, healthcare professionals, municipal employees, and other essential workers has implications for public services, local businesses, and transportation.

The Coalition encourages the City to place greater emphasis on practical, regionally coordinated workforce housing solutions through partnerships with Collier County, employers, and other stakeholders. These efforts should balance the needs of the workforce with the preservation of established neighborhoods, property rights, and the City's distinctive character.

12. Ensure Compliance with Senate Bill 180

The Coalition encourages the City to carefully evaluate the implications of Florida Senate Bill 180, which establishes restrictions on certain comprehensive plan amendments and land development regulations through October 1, 2027. Several provisions within the current Draft Plan may warrant additional legal review to determine whether they conflict with the legislation, particularly those affecting redevelopment and individual property rights.

Given these potential concerns, and recognizing that the City's next state-mandated Comprehensive Plan evaluation is not due until 2032, the Coalition believes there is no compelling reason to accelerate adoption. Allowing additional time, potentially beyond October 2027, would provide an opportunity to ensure statutory compliance, incorporate meaningful community input, and develop a legally sound, thoughtful, and implementable Plan.

13. Emphasize Fiscal Responsibility and Long-Term Financial Sustainability

The Coalition believes the Comprehensive Plan should recognize the financial implications of its long-term goals and policies, particularly those involving resiliency, infrastructure modernization, and capital improvements. As the City identifies future priorities, consideration should be given to realistic funding mechanisms, fiscal sustainability, and the potential financial impact on residents and taxpayers.

The Coalition encourages stronger alignment between the Comprehensive Plan, the City's long-term financial planning, and its Capital Improvement Program to ensure that proposed initiatives are achievable, appropriately prioritized, and supported by responsible fiscal stewardship.

Conclusion

The Coalition appreciates the opportunity to participate in this important planning effort and acknowledges the significant time, expertise, and resources the City has committed to developing its Draft Comprehensive Plan. Our review reflects a sustained, collaborative effort among representatives of diverse Naples communities united by a commitment to the City's long-term well-being. Despite our neighborhoods' distinct characteristics and priorities, our discussions consistently reinforced common principles: preserving Naples' exceptional qualities, respecting property rights, modernizing critical infrastructure, strengthening resiliency, encouraging meaningful resident participation, and exercising responsible fiscal stewardship.

We believe a strong Comprehensive Plan must articulate a compelling vision while providing a practical path toward achieving it. It should recognize Naples as an evolving community while protecting its natural resources, neighborhood identities, and quality of life. It must also acknowledge that challenges involving drainage, beaches, transportation, workforce housing, and critical infrastructure often require coordinated solutions beyond City boundaries.

The Coalition also notes that the Future Land Use Element presented particular challenges during our review. Its extensive narrative made it difficult to distinguish substantive policies from broader statements of intent, particularly when assessing potential implications for amendments to the Land Development Code. Accordingly, while we have identified areas of concern and recommended improvements, our suggested revisions to this Element should not be considered comprehensive.

Given the Plan's long-term significance, the Coalition encourages the City to prioritize quality, clarity, legal soundness, and effectiveness over an accelerated adoption schedule. Sufficient time for thoughtful review, meaningful public participation, and regional coordination will result in a stronger, more enduring planning framework.

The Coalition offers these findings and the enclosed recommendations (provided on a Word document as well as a yellow-highlighted Draft Plan) in the spirit of partnership and constructive engagement. We welcome continued dialogue with City staff, the Planning Advisory Board, City Council, and community stakeholders as the Plan is refined. Our shared objective is a clear, cohesive, forward-looking, and implementable Comprehensive Plan that serves Naples residents today and provides a strong foundation for future generations.

Respectfully,

Leadership of the HOA Coalition

Bruce Robin, Aqualane Shores
Maegan Dustin, Coquina Sands
Helen McGrath, GSAC
Cliff Holland, The Moorings
Nancy Walkenhorst, Park Shore Association
Bob Meier, Port Royal Association
Joe Murray, Royal Harbor Association
Nick Zimmerman, Sun Terrace

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HOA Coalition Suggested Additions and Edits

Naples 2045 Draft Comprehensive Plan | October 23, 2026

1. Vision Element: New Vision Statement

(V-1) Naples is a vibrant and sophisticated coastal community distinguished by its exceptional quality of life, natural beauty and beaches, safety and security, distinct neighborhoods, healthy economy, small-town charm, and unique sense of place. As Naples continues to evolve and renew, it will protect these defining qualities while embracing thoughtful change, respecting individual property rights, and preparing for the needs of future generations.

Naples will continue to strengthen community resiliency, protect and enhance its natural resources, and modernize essential infrastructure. Through responsible stewardship and collaboration with local, state, and regional partners, Naples will embrace opportunities to improve mobility, expand workforce housing, adapt to a changing coastal environment, and remain a resilient, thriving community for generations to come.

2. Future Land Use Element

(FLU-2) Naples is recognized as an established yet continually renewing coastal community. The Plan should protect the distinct character and quality of life of its residential neighborhoods while encouraging thoughtful redevelopment, reinvestment, and architectural evolution. Land-use policies should respect private property rights, promote compatibility among neighboring uses, strengthen environmental stewardship and coastal resiliency, and support the modernization of aging infrastructure. The Plan should provide a clear, balanced, and predictable framework that allows Naples to evolve responsibly while preserving the qualities that make it an exceptional place to live.

(FLU-7) Manage new development, redevelopment, and reuse to support orderly, balanced, and resilient growth; encourage thoughtful renewal and private reinvestment; respect private property rights; and promote reasonable compatibility with surrounding neighborhoods and infrastructure capacity.

(FLU-10/Policy FLU 1.6 Adequate Public Facilities in Development Approval Process) The City shall evaluate cumulative impacts of proposed development on drainage, transportation, utilities, public safety, and other public facilities, and identify necessary improvements and funding responsibilities before approvals, consistent with applicable law.

(FLU-11/Policy FLU 1.8 Stormwater Management) Evaluate runoff and downstream effects at the neighborhood and watershed scale, including existing drainage deficiencies, and coordinate stormwater improvements with the capital improvement program.

(FLU-16/Policy FLU 3.3 Resilient Land Use and Investment) This policy shall not be interpreted to discourage lawful rebuilding, elevation, storm-hardening, infrastructure upgrades, or other resilience investments in established coastal residential neighborhoods, subject to applicable safety and environmental requirements.

(FLU-21/Policy FLU 5.3 Buffers and Transitions) Buffering and transitions shall be evaluated using objective criteria addressing scale, intensity, traffic, noise, lighting, drainage, and impacts on adjacent residential properties.

(FLU-22/Policy FLU 5.4 Downtown Mixed Use) Mixed-use redevelopment shall be coordinated with transportation, parking, drainage, utilities, and public-realm capacity, with particular attention to transitions adjoining established residential neighborhoods.

(FLU-23/Objective FLU-6: Protect Community Character) Support Neighborhood Character and Thoughtful Renewal. Protect the distinct character and sense of place of Naples neighborhoods while accommodating compatible architectural evolution, reinvestment, redevelopment, and resilience improvements consistent with applicable zoning and property rights.

(FLU-26/Policy FLU 6.2 Compatibility and Character of Neighborhoods) Preserve and protect stable residential neighborhoods through development practices that promote ***reasonable compatibility in use, scale, and neighborhood context while allowing architectural diversity, property reinvestment, and responsible renewal***. ~~compatibility and consistent character~~.

(FLU-26/Policy FLU 6.4 Align Development Standards with Established Character and the Green Jewel Concept) Any proposed amendments shall be informed by neighborhood-specific conditions, transparent public engagement, objective performance standards, and analysis of impacts on existing property rights and lawful redevelopment.

(FLU-26/Action FLU-6.4.3) Evaluate whether additional single-family open-space, pervious-area, or landscape standards are necessary based on measurable drainage, canopy, and environmental outcomes, with appropriate flexibility for differing lot sizes, zoning districts, and established development patterns.

(FLU-27/Action FLU-6.4.4) Study demonstrable impacts of building scale and lot coverage, including stormwater runoff, drainage, setbacks, and compatibility, rather than treating home size alone as an adverse impact. Consult affected neighborhoods before proposing Code amendments.

(FLU-27/Policy FLU-6.6 Old Naples Area Study) Residential Neighborhood (not singularly Old Naples) Area Study. The City of Naples will initiate a study of the city's neighborhoods to determine architectural and development standards to protect and preserve the existing residential character of the area.

(FLU-32/Policy FLU-7.1) Establish a Neighborhood Planning Process) The Neighborhood Planning Process shall include early, meaningful consultation with residents, recognized neighborhood associations, and property owners, with published opportunities to review and comment on proposed neighborhood boundaries, priorities, and plans.

(FLU-32/Action FLU-7.1.1) Neighborhood plans shall identify prioritized infrastructure and resilience needs, responsible City departments, potential funding sources, and a transparent mechanism for reporting progress and coordinating with the Five-Year Capital Improvements Program.

3. Housing Element

(H-7/Policy H-1.8 Fair Share Affordable Housing Ordinance) Any proposed affordable housing strategies or development incentives shall consider compatibility with established residential neighborhoods, existing land use and zoning designations, infrastructure capacity, and the City's adopted Comprehensive Plan policies. Such strategies should prioritize regional coordination and ensure that affordable housing initiatives do not adversely affect the character, stability, or existing development patterns of established neighborhoods.

(H-10/Policy H-2.4 Flexible Land Development Regulations for Mixed-Use and Diverse Housing Types) Such flexibility shall be consistent with adopted Future Land Use policies and shall consider the compatibility of proposed development with surrounding residential neighborhoods, existing development patterns, transportation networks, and available public infrastructure and services.

(H-14/Objective H-3: Preserve and Protect Existing Residential Neighborhoods Through Housing Programs) The City and County shall also recognize the importance of preserving the stability and integrity of established residential neighborhoods through appropriate land use planning, infrastructure maintenance and improvements, and development standards that encourage compatible redevelopment and reinvestment.

(H-17/Policy H-4.4: Post-Disaster Replacement Housing Standards) Post-disaster housing recovery and redevelopment efforts should also consider long-term community resiliency, flood risk reduction, stormwater management, and the capacity of existing public infrastructure, consistent with the City's Resiliency and Coastal Management Elements.

4. Conservation and Coastal Management Element

(CCM-2/Goal, Objective, Policies, and Actions) Add "resilience" to the Goal section.

(CCM-2/Objective CCM-1 Water Quality) The City shall prioritize the evaluation, maintenance, and improvement of aging stormwater infrastructure, including drainage conveyance systems, outfalls, and stormwater retention facilities, to improve water quality, reduce localized flooding, and enhance the long-term effectiveness of the City's stormwater management system. Prioritization should consider documented infrastructure deficiencies, recurring flooding conditions, environmental impacts, and opportunities for coordinated improvements with Collier County and other regional partners.

(CCM-5/Policy CCM-1.5 Urban Landscaping Best Management Practices) Add "while maintaining Naples' green jewel character.".

(CCM-6/Objective CCM-2 Natural Resource Protection) Add "green jewel character".

(CCM-6/Policy CCM-243 Supporting Ongoing Beach Protection and Renourishment) The City shall work collaboratively with Collier County, state and federal agencies, and affected coastal communities to identify and address regulatory, logistical, and funding barriers that may prevent eligible shoreline areas from participating in regional beach nourishment and restoration programs. Such efforts should seek comprehensive and coordinated shoreline protection throughout the City, recognizing the importance of beaches and dune systems to public safety, environmental protection, and long-term coastal resiliency.

(CCM-10/Policy CCM-4.3 Continue Protective Measures for Trees) Add "to enhance Naples' green jewel character.".

(CCM-12/Policy CCM-5.2 Direct Growth Away from Coastal High Hazard Areas) Add Note: Implementation of this policy shall recognize the distinction between new development that increases population density within Coastal High Hazard Areas and the lawful redevelopment, rehabilitation, or reconstruction of existing properties consistent with adopted land use and zoning regulations.

(CCM-14/Policy CCM-6.4 Development and Redevelopment Techniques) Development and redevelopment standards should seek to prevent adverse off-site drainage impacts and should be coordinated with planned improvements to public stormwater infrastructure.

5. Resiliency Element

(R-5/Action R-1.3.2) In addition to citywide workshops, the City shall seek meaningful engagement with affected neighborhood and homeowners' associations during the planning and prioritization of significant infrastructure and resiliency projects. Such engagement should occur early enough in the planning process to allow community input regarding documented flooding conditions, neighborhood access, project impacts, and potential implementation alternatives.

(R-6/Policy R-2.3 Coalesce Stormwater Planning) The City shall integrate the findings and recommendations of its Stormwater Master Plan, Multi-Basin Assessments, and Critical Infrastructure Resiliency initiatives into a coordinated, phased infrastructure improvement strategy. Such efforts should prioritize immediate remedial actions, targeted improvements to identified drainage deficiencies, and long-term renewal of aging stormwater and utility infrastructure. Implementation priorities shall consider documented flooding conditions, infrastructure age and condition, public safety, adopted levels of service, and opportunities to coordinate improvements across utility systems.

(R-8/Policy R-2.7 Capital Projects and Budget Process) The City shall incorporate identified infrastructure deficiencies, vulnerability assessments, adopted levels of service, and documented recurring flooding conditions into its annual capital improvement planning and budget process. Capital project priorities should be established through a transparent, data-driven evaluation that considers public safety, infrastructure condition, frequency and severity of flooding, service reliability, and long-term community benefit.

(R-10/Action R-2.9.2) Priority shall be given to critical infrastructure exhibiting repeated operational failures, documented flooding deficiencies, or conditions that compromise public safety and essential services. The City shall seek to coordinate the rehabilitation or replacement of aging stormwater, wastewater, potable water, and other utility systems where concurrent improvements provide operational efficiencies, reduce repeated construction impacts, and improve long-term service reliability.

(R-13/Policy R-3.1 Neighborhoods at Risk of Flooding) The City shall prioritize neighborhood-level flood mitigation strategies that address documented drainage deficiencies, recurring flooding, and vulnerabilities associated with aging public infrastructure. Such strategies should consider neighborhood-specific conditions, including stormwater conveyance, tidal influences, roadway elevations, emergency access, and

the interaction between public infrastructure and private property drainage systems. The City should coordinate with affected neighborhood associations in identifying priorities and evaluating potential solutions.

(R-15/Policy R-3.5 Divert Development Away from Vulnerable Areas) The City shall evaluate feasible, voluntary incentives to direct new development away from areas identified as particularly vulnerable to flooding and other natural hazards, consistent with adopted land use policies and applicable state law. Such strategies shall recognize the distinction between new development and the lawful redevelopment, reconstruction, or improvement of existing properties. Implementation shall respect established residential neighborhoods, existing property rights, and the ability of property owners to maintain and improve their properties in accordance with applicable regulations.

(R-18/Policy R-4.3 Shoreline Protection, Restoration Plans, and Funding Strategies) The City shall work collaboratively with Collier County and appropriate state and federal agencies to identify and address regulatory, logistical, and funding barriers to comprehensive shoreline protection and beach nourishment. Regional coordination should seek equitable consideration of coastal areas throughout the City and support long-term strategies that protect public safety, natural resources, and the economic and environmental benefits of healthy beaches and dune systems.

6. Public Facilities and Water Resources Element

(PFWR-5/Policy PFWR 1.1 Capital Improvements Prioritization and Programming) Add "and coordination, where appropriate, with Collier County, regional and state agencies, and public and private utility providers,".

(PFWR-15/Objective PFWR-3 Stormwater Management and Flood Resiliency) Infrastructure planning and investment should consider both existing deficiencies and reasonably anticipated future conditions over the useful life of the infrastructure.

7. Transportation Element

(T-6/Policy 1.6) Why is this deleted?

(T-6/Policy 1.11) Why is this deleted?

(T-7/Objective T-2 Transportation and Land Use Coordination) ~~The City's annual traffic counting programs, monthly counts and quarterly counts, are posted on the City's website within 30 days of completing the~~

~~periodic traffic counts; additionally, historic data for the period 1995 to the current period is posted for public review and use.~~ We suggest keeping this language.

(T-8/Objective T-2.3 Traffic Impact Analyses) Require transportation and traffic impact analysis for all commercial and residential development proposals ~~over one (1) acre~~ per thresholds established in the Code of Ordinances. Note: *The Coalition would like clarification on this language.*

(T-9/Policy T-3.2 Sidewalks Included with Street Projects) Question: what is considered a major street renovation?

(T-13/Policy T-5.6 Peak-Hour and Peak-Season Traffic Counts) Note: Keep monthly or quarterly.

(T-19/Objective T-11 Aviation) Note: this should be revisited following settlement with the NAA.

8. Parks, Recreation and Open Space Element

(PROS-5/Policy PROS-1.2 Parks and Recreation Needs Assessment) Add: evaluate residents' opinions to determine how effectively parks and recreation services create positive, welcoming, and enjoyable experiences;).

(PROS-6/Objective PROS-1.2 Promote Environmental Resiliency and Sustainability) Add: "Responsibility" to the Objective title; add "wildlife" to text.

(PROS-8/Policy PROS-2.12 Promote Enjoyment and Protection of Wildlife) Add new policy: The City shall enact and implement policies for its parks, Naples City Dock, Naples City Pier, beaches, and other public waterfront areas that support and are consistent with the State of Florida's laws, rules, and regulations for the protection of wildlife. Such policies should promote responsible public use while enhancing the experience of nature to represent the commitment of Naples to environmental stewardship. The City should coordinate with relevant state and federal agencies and update its practices as wildlife-protection requirements and best management practices evolve.

10. Intergovernmental Coordination Element

(IC-3/Objective IC-1 Intergovernmental Coordination on Land Use Planning, Public Services, and Infrastructure) Such coordination should include opportunities for meaningful input from established

neighborhood associations and community organizations, particularly when intergovernmental planning decisions may affect neighborhood character, public infrastructure, transportation, stormwater management, or the delivery of essential services.

(IC-5/Policy IC-1.2 Joint Land Use Planning Agreements and Studies) Joint planning efforts should also consider interconnected stormwater and drainage systems, transportation networks, coastal resiliency, emergency evacuation routes, and other critical infrastructure where decisions in one jurisdiction may materially affect neighboring communities.

(IC-5/Policy IC-1.5 Citywide Communications) The City shall promote transparent, timely, and meaningful public communication and participation in intergovernmental planning initiatives. Such efforts should include proactive engagement with established neighborhood associations, community organizations, and affected residents, particularly when proposed policies, infrastructure improvements, or development decisions may have significant neighborhood or communitywide impacts.

(IC-12/Objective IC-4 Interjurisdictional Coordination on Resiliency) Interjurisdictional coordination should prioritize the identification and implementation of critical infrastructure improvements, particularly where interconnected stormwater systems, coastal flooding, transportation corridors, and utility networks require collaborative planning, funding, and implementation across jurisdictional boundaries.

(IC-14/Policy IC-4.5 Regional Collaboration) The City shall collaborate with other governmental partners to provide residents, businesses, established neighborhood associations, and community organizations with information on current and projected resilience challenges, including flooding, sea-level rise, and infrastructure adaptation. The City shall actively solicit stakeholder input early in the planning process and consider such input when establishing priorities, evaluating adaptation alternatives, and developing municipal policy updates.

(IC-15/Policy IC-4.6 Stormwater Infrastructure Improvement Coordination) Coordination should also include identifying shared drainage challenges, evaluating downstream and upstream impacts, prioritizing critical infrastructure improvements, and exploring opportunities for coordinated project implementation and funding.

(IC-19/Objective IC-6 Annexations) The City shall provide meaningful opportunities for residents, property owners, and established neighborhood organizations in proposed annexation areas and adjacent City neighborhoods to participate in the planning process, including consideration of infrastructure capacity, service delivery, neighborhood compatibility, and potential fiscal impacts.

11. Concurrency and Capital Improvements Element

(CC1-3/Goal, Objectives, Policies, and Actions) Proactively deliver modern, resilient, facilities and public services that adapt to ongoing growth and redevelopment while future-proofing our infrastructure against changing weather realities and evolving landscapes. This shall be done by responsible fiscal planning, proactive maintenance and modernization of ageing infrastructure, and strategic capital investments that address existing deficiencies, support future needs, and preserve the quality of life of Naples residents.

(CC1-4/Action CCI-1.2.4) Capital projects identified through the Neighborhood Planning process, including documented infrastructure deficiencies and priorities identified through consultation with residents and neighborhood associations, shall be evaluated annually for incorporation into the Five-Year Capital Improvements Program. The City should provide opportunities for affected neighborhoods to participate in identifying and prioritizing infrastructure improvements.

(CC1-6/Policy CCI-1.8 Correct Existing Deficiencies) This will ~~ensure~~ deliver maximum value for taxpayers by balancing fiscal prudence with necessary investments in our city's future. ~~the lowest possible tax burden on City residents~~

(CC1-7/Policy CCI-1.10 Fund Projects and Programs) Add bullet: Prioritize the repair, rehabilitation, and replacement of aging or vulnerable critical infrastructure based on documented condition assessments, public safety considerations, recurring infrastructure deficiencies, and the potential consequences of infrastructure failure.

(CC1-11/Policy CCI-2.3 Update Stormwater LOS Standards) Within one year of completion of the 2026 Watershed Master Plan, the City shall review its Stormwater Management System and update applicable level-of-service standards as needed. The review should consider existing drainage deficiencies, infrastructure conditions, current and projected flood risks, and the anticipated impacts of changing rainfall and coastal conditions. Identified infrastructure improvements should be evaluated and prioritized for inclusion in the City's Five-Year Capital Improvements Program.

(CC1-14/Objective CCI-45 Coordination of Land Use Decisions) Such evaluations should consider the cumulative impacts of development and redevelopment on existing infrastructure, including stormwater systems, transportation networks, utilities, and public services, particularly within established residential neighborhoods.

(CC1-15/Policy CCI-6.5 Determine Fiscal Sustainability of Capital Improvements Program) Add: Fiscal sustainability evaluations should consider the anticipated long-term operating, maintenance, rehabilitation, and replacement costs of proposed capital improvements, together with available funding sources and potential impacts on taxpayers.

HOW TO READ THIS DOCUMENT

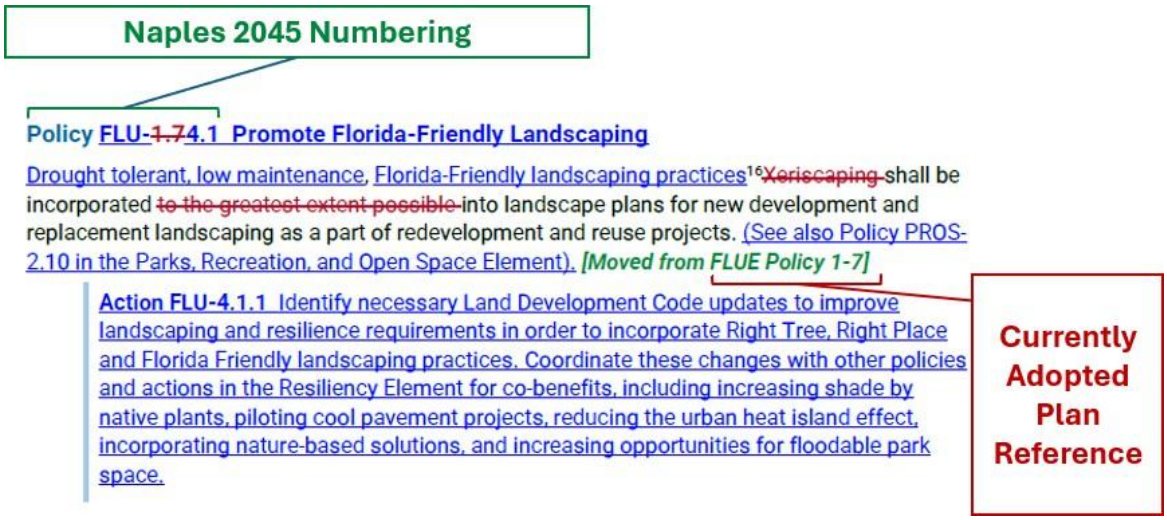
This Extended Public Review version of the Naples 2045 Comprehensive Plan (July 2026) has been formatted to clearly identify which language was carried forward from the currently adopted comprehensive plan, last updated in 2024.

Black text	identifies language that has been included in the Naples 2045 unchanged from the currently adopted comprehensive plan.
Blue, underlined text	delineates language that is proposed new text in the Naples 2045 Plan.
~~Red strikethrough text~~	shows currently adopted Plan language that is proposed to be removed as part of modifications in the Naples 2045 Plan.
[Green, bold, italicized text in brackets]	provide notations about where language has moved as part of the modifications in the Naples 2045 Plan.
Footnotes	provide supplementary information about sources of changes or other editorial notes to aid the reader.

Note: The Naples 2045 Plan utilizes a new numbering system for the Objectives, Policies, and Actions. Each of these is identified with an acronym for the Element, followed by a hyphen and subsequent numbering for the Objectives, Policies, and Actions, as shown below.

- Future Land Use (**FLU-#.#.#**)
- Housing (**H-#.#.#**)
- Conservation and Coastal Management (**CCM-#.#.#**)
- Resiliency (**R-#.#.#**)
- Public Facilities and Water Resources (**PFWR-#.#.#**)
- Transportation (**T-#.#.#**)
- Parks, Recreation, and Open Space (**PROS-#.#.#**)
- Intergovernmental Coordination (**IC-#.#.#**)
- Concurrency and Capital Improvements (**CCI-#.#.#**)
- Property Rights (**PR-#.#.#**)

Policies and actions identified with an E for Element (example below) identify numbering that may have been updated from the currently adopted plan.



July
2026

Naples 2045 Comprehensive Plan:
Implementing the Vision

EXTENDED PUBLIC REVIEW
DRAFT PLAN





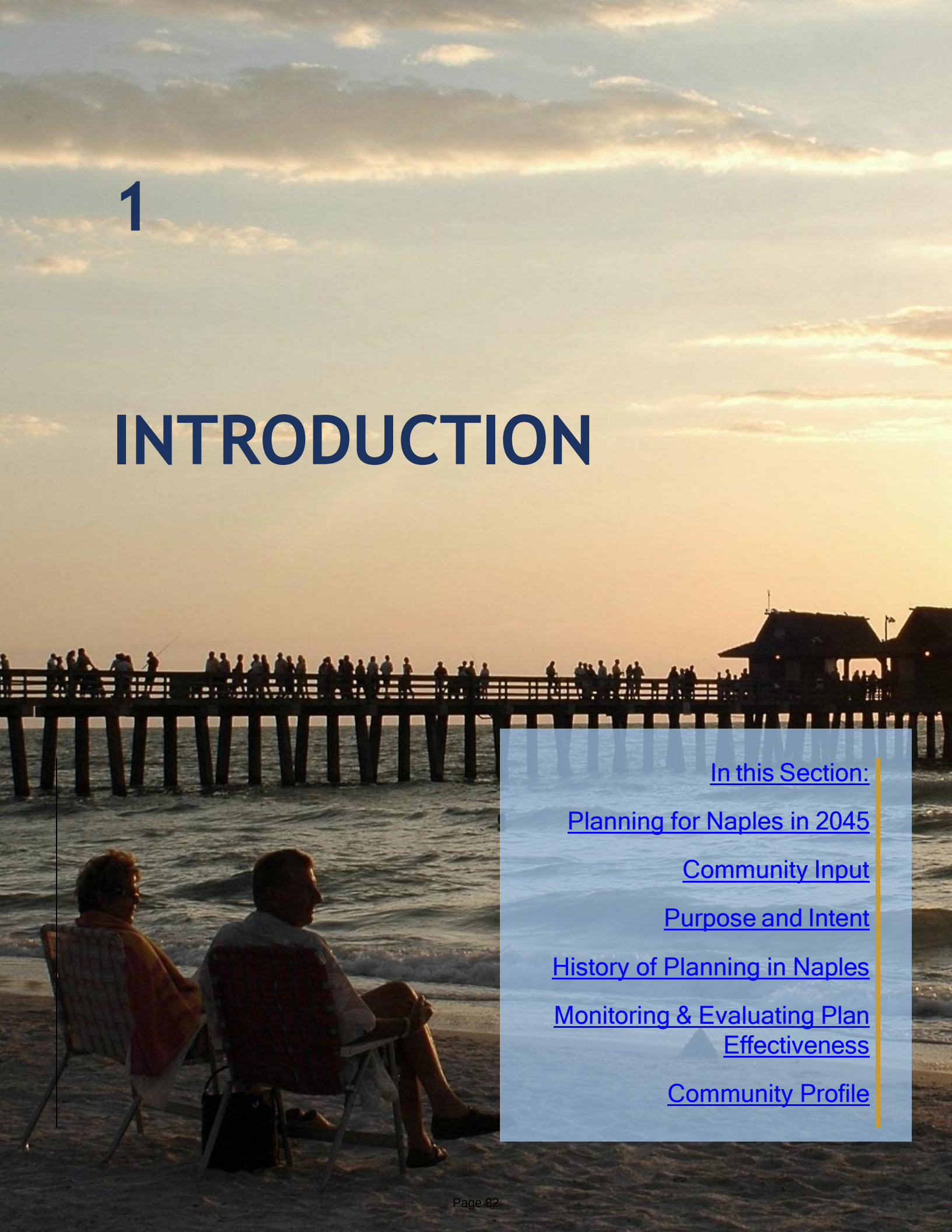






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1

INTRODUCTION

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~~INTRODUCTION~~ PLANNING FOR NAPLES IN 2045

Naples is a community of distinction, characterized by a beautiful natural environment, attractive neighborhoods, and high-quality commercial corridors, all of which will be upheld through thoughtful planning and a commitment to resiliency.

The City has a long and intentional planning history that has led to its strong reputation as a premier coastal community. This Naples 2045 Comprehensive Plan: Implementing the Vision is the next chapter of the City's planning story, focused on achieving the Vision of its residents and protecting the special character that makes Naples such a special place to live.

In 2026, this small Gulf Coast community is nearing full build out. Due to the desirability of the area and related growth pressures, Naples is experiencing redevelopment of aging properties and corresponding changes in community character. The City is 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. It is also working to manage the negative impacts on the City due to growth on its edges in unincorporated areas and beyond.

To address these core issues, the City will use this Naples 2045 Comprehensive Plan to guide policy decisions and public investments through the next two decades and will remain focused on achieving the aspirations of its residents as described in the Plan. This long range policy direction is expressed as Goals, Objectives, Policies, and Actions. It is centered on achieving several community priorities: Protecting community and neighborhood character, establishing a more resilient approach to managing public lands and infrastructure, encouraging more resilient development on private lands, and maintaining the quality of life that residents have come to love by aligning land use, infrastructure, and environmental stewardship. By integrating public input with technical analysis, Naples is leveraging this Comprehensive Plan as a proactive tool to manage growth and change, safeguard natural resources and public investments, and ensure the city remains livable and vibrant through 2045.

THE VISION[1]

The Vision Element is an optional comprehensive plan element per Florida Statute § 163.3177. In 2019, the City of Naples began a visioning process to renew this element that started with four public workshops followed by an online survey that was noticed Citywide. The process focused on assessing the 2007 Vision to determine if the City had been successful in implementation and to decide if a change in direction or priorities was warranted.

In March 2020, City Council updated the City's Vision, and incorporated it into the Comprehensive Plan as an optional element in August 2024. This new Vision Element articulated the key priorities and strategies for community action based on the priorities and

[1] This section was added per recommendation of the PAB.

aspirations of City residents. The Naples Vision includes Initiatives and Priorities under themes of Our Place, Our Nature, Our Experience, Our Economy, and Our Governance. The Naples 2045 Comprehensive Plan update process engaged residents in conversations and questionnaires about the adopted Vision and reaffirmed the Vision's Initiatives and Priorities for Naples. For more information, please see the Vision Element.

The Naples 2045 Comprehensive Plan is focused on implementing the ideas and aspirations contained in the Vision. The icons below represent each of the five components of the Naples Vision; to illustrate the connections between the Objectives in this Plan and the Vision, these icons appear throughout the Plan.



COMMUNITY INPUT

Community input gathered from the 2025-2026 public engagement activities for the Naples 2045 Comprehensive Plan update validated the City's Vision priorities and helped shape plan recommendations around key themes such as resiliency, preservation of small-town character, and managing growth.

The last major update to the City of Naples Comprehensive Plan was adopted in November 2018 by Ordinance 2018-12426. Since that time, City leaders recognized the need to conduct a more thorough review and modification of the Plan and to engage residents in these planning efforts.

In March 2025, the City launched a 22-month planning effort to update the Comprehensive Plan and more fully implement Naples' Vision. This effort was focused on reinforcing the newly adopted Vision; revising Plan goals, objective, and policies; and introducing actions to address emerging challenges facing Naples over the next twenty years. Community outreach and engagement were integral to the Naples 2045 Comprehensive Plan update. Early in the process, a Public Involvement Plan was developed to outline strategies for sharing information and gathering input from residents, including a summary of engagement activities, a proposed outreach approach, and a tentative schedule for key community input opportunities.

The key public engagement activities were conducted between October 2025 and March 2026 and included two rounds of community meetings; workshops with City Council, Planning Advisory Board, and Presidents' Council; updates through social media and a dedicated project website; ongoing collection of comments; and two rounds of questionnaires. The primary objective of the public engagement activities was to solicit discussion on several of the City's adopted Vision themes to ensure the recommendations drafted for the Comprehensive Plan update reflect community priorities. Key topics for discussion included resiliency, balancing redevelopment with preservation of the city's small town character, and managing growth related demands on infrastructure and natural resources. Input received from the first round of public engagement was evaluated, summarized, and shared at joint workshop with the Planning Advisory Board and City Council in January 2026. A second round of public engagement activities was held between January and March 2026 to collect feedback on preliminary recommendations on the Comprehensive Plan update. A Public Engagement Summary Report was prepared in March 2026, including a summary of Questionnaire 1 Responses, Summary of Questionnaire 2 Responses and Community Workshop Executive Summary. The Report serves as a consolidated resource, detailing all public engagement activities conducted for the Naples 2045 Comprehensive Plan update.

PURPOSE AND INTENT[2]

~~Generally,~~Per the Florida Community Planning Act (Chapter 163, Part II of the Florida Statutes) the Comprehensive Plan is designed as a blueprint for development, establishes the regulatory framework for growth, and is used as a guide for land use decision making. ~~Based on the review of the goals of the Comprehensive Plan, the EAR concluded that the Comprehensive Plan has served the City well in that capacity. In addition, the goals reflect the existing policy and direction of the City and continue to provide effective guidance for decision-making.~~ The general roles of the Comprehensive Plan are as follows:

- Preserve and protect desired community conditions
- Guide orderly growth and development and related public infrastructure
- Serve as the primary policy framework for land use decisions
- Protect public health, safety, and welfare
- Coordinate planning across jurisdictions
- Encourage the most appropriate use of land, water, and resources, consistent with the public interest as supported by community input
- Overcome present shortfalls in services and land use related issues
- Deal effectively with future problems that may result from the use and development of land

The Plan is distinct from the City's regulations found in the Naples Land Development Code (LDC) in that it provides direction through identification of Goals, Objectives, Policies, and Actions that promote the Vision for the community, and are then implemented through the Code of Ordinances and other regulating documents, public investments, and related planning initiatives.



As described in the Planning Cycle to the right, the Comprehensive Plan is the long-range policy document that establishes the game plan for the City's departmental work plans, public funding needs, and implementation priorities.

Florida Statutes Section 163.3177(6) establishes the specific comprehensive plan "elements" that local governments must include in their plans. The table below identifies the ten elements required by Florida Statutes and the corresponding Naples 2045 elements.

[2] This section was added per recommendation of the PAB.

STATE-REQUIRED ELEMENTS	NAPLES 2045 ELEMENTS
(Optional Element)	Vision
Future Land Use	Future Land Use
Housing	Housing
Coastal Management	Conservation and Coastal Management
Conservation	*(Included Above)*
(Optional Element)	Resiliency
Infrastructure (Sanitary Sewer, Solid Waste, Drainage, Potable Water and Natural Groundwater Aquifer Recharge)	Public Facilities and Water Resources
Transportation	Transportation
Recreation and Open Space	Parks, Recreation, and Open Space
Intergovernmental Coordination	Intergovernmental Coordination
Capital Improvements	Concurrency and Capital Improvements
Concurrency Management *(Optional Element)*	*(Included above)*
Private Property Rights	Private Property Rights

~~In 1989, the City adopted a Comprehensive Plan pursuant to the 1986 Growth Management Act (Chapter 163, Florida Statutes) which was updated and adopted in 1998. This plan is an update of the 1998 plan based on the Evaluation and Appraisal Report (EAR) adopted by City Council in 2007. Details of the EAR process are provided in Section 2 of the Introduction. The planning timeframe for this document is a five year short-term and ten year long term from adoption. For purposes of transportation planning and in order to be consistent with the Collier County MPO, the City's 10-year planning timeframe is defined by the year 2015 and the 25-year planning timeframe is defined by the year 2030.~~

~~The Growth Management Act (GMA) was approved by the legislature for the purpose of utilizing and strengthening the existing role, processes, and powers of local and state government in the establishment and implementation of comprehensive planning programs to guide and control future development. In part, the Act states that it is necessary to adopt a plan~~

> ~~*"so that local governments can preserve and enhance present advantages; encourage the most appropriate use of land, water, and resources, consistent with the public interest; overcome present handicaps and deal effectively with future problems that may result from the use and*~~

development of land within their jurisdictions. Through the process of comprehensive planning, it is intended that units of local government can preserve, promote, protect, and improve the public health, safety, comfort, good order, appearance, convenience, law enforcement and fire prevention, and general welfare; prevent the overcrowding of land and avoid undue concentration of population; facilitate the adequate and efficient provision of transportation, water, sewerage, schools, parks, recreational facilities, housing and other requirements and services; and conserve, develop, utilize, and protect natural resources within their jurisdictions."

Toward this end, the Act requires that each unit of local government establish a "planning process," and prepare, adopt, and implement a Comprehensive Plan. The planning process is required to be ongoing, based on effective public participation, and provide for the review and evaluation of the Plan on a regular basis. The Plan itself must be internally consistent and based upon reasonable economic assumptions. The GMA recognizes that differing local circumstances will dictate a variety of approaches to planning for future growth.

Chapter 163, F.S., gives the adopted Comprehensive Plan legal stature in that no public or private development shall be permitted except in conformity with adopted Comprehensive Plans. Local governments must relate all development decisions to the Plan and not approve any development programs or actions that would be inconsistent with it. The Plan must be firm enough to provide adequate direction, yet flexible enough to deal with new problems and challenges. Every plan is required to contain the following elements:

a. Future Land Use
b. Traffic Circulation
c. Sanitary Sewer, Solid Waste, Drainage, Potable Water and Natural Groundwater Aquifer Recharge
d. Recreation and Open Space
e. Housing
f. Conservation
g. Coastal Management
h. Intergovernmental Coordination
i. Capital Improvements
j. Public School Facilities

As noted in the table above, Tthese elements may be combined to meet local circumstances, and local jurisdictions may also adopt a variety of optional elements. The City has maintained a combined the Conservation and Coastal Management Elements, integrated the goal, objectives, policies of the Concurrency Management Element into the Concurrency and Capital Improvements Element, carried forward the optional Vision Element, and added a new optional

Resiliency Element. The previously adopted Comprehensive Plan included an optional Public School Facilities Element; however the goal, objectives, and policies are now incorporated into the Future Land Use, Concurrency and Capital Improvements, and Intergovernmental Coordination Elements as applicable to improve coordination, reduce redundancy, and better reflect how school planning intersects with the policies within other required elements. ~~and simplified the title of the Sanitary Sewer, Solid Waste, Drainage, Potable Water and Natural Groundwater Aquifer Recharge Element to Public Facilities and Water Resources Element~~.

~~Section 9J-5, Florida Administrative Code, "Minimum Criteria for Review of Local Comprehensive Plans and Determination of Compliance," provides the detailed requirements for the scope and content of the Plan.~~

~~Specifically, 9J-5 includes criteria for determining: whether the elements are in compliance with the requirements of the GMA; that other elements of the Comprehensive Plan are related to and consistent with each other; consistency of the Plan with the State Comprehensive Plan and the Regional Policy Plan; that water bodies between two jurisdictions are managed in a consistent and coordinated manner; and that the elements identify the mechanisms and procedures for monitoring, evaluating and appraising the Plan's components.~~

~~Section 9J-5.002 recognizes specific situations which allow flexibility in the detail of the data, analyses, and the content of the goals, objectives, policies, and other graphic or textural standards.~~

~~The identified situations in 9J-5.002(2) include: "the local government's existing population and rate of population growth; the geography and size of the local government's jurisdiction, and the extent or existence of undeveloped land; and the scale of public services the local government provides or is projected to provide as it relates to the level of capital improvements planning required.~~

~~For the most part, the Plan meets the minimum criteria outlined in 9J-5. However, the City has a low growth rate, restricted geographic boundaries, limited undeveloped land, and minimal future infrastructure needs. The Plan was drafted primarily to meet the City's needs and provides compliance with 9J-5 requirements at a level appropriate for the City.~~

~~The legislature has recognized the importance of the review criteria of local plans and has defined the term "consistency." Consistency is determined based on whether the Plan is "compatible with" and "furthers" the State Comprehensive Plan and Regional Policy Plan. The term "compatible with" means that the local plan is not in conflict with these plans. The term "furthers" means to take action in the direction of realizing goals or policies of the State or Regional plan.~~

HOW TO READ THIS PLAN

Each Element of this Plan, as noted in the table above, contains the following components:

- **Goals** are the long-term end toward which programs and activities are ultimately directed.
- **Objectives** identify areas of focus.

- **Policies** are the way in which programs and activities are conducted to achieve an identified Goal.
- **Actions** are actionable strategies that involve performing a task or producing a deliverable.

HISTORY OF PLANNING IN NAPLES

The City of Naples originated in the late nineteenth century as a small coastal settlement centered around the Gulf and the historic Naples Pier. Over time, the community evolved from a fishing village and winter resort into a distinctive coastal city characterized by walkable neighborhoods, modest residential scale development, mature vegetation, and diverse architectural traditions. These important characteristics and design elements are the result of decades of intentional planning, as described on the following timeline.

- 1800s: First Settlers in Naples
- 1923: Town of Naples Incorporated
- 1947: Town Council adopts the Naples Plan to "Make Naples a Better Place to Live"
- 1949: Naples incorporated following adoption of its City Charter
- 1952: Harland Bartholomew and Associates contracted to prepare first Comprehensive Plan and the City established the Board of Supervising Architects
- 1953: Naples adopts first Zoning Ordinance
- 1972: City of Naples and Collier County contract a planning consultant to develop a Comprehensive Plan for the Naples Urban Area
- 1976: City establishes the Planning Advisory Board
- 1989: Naples Comprehensive Plan is amended to address the Local Government Comprehensive Planning and Land Development Regulation Act (also known as the Growth Management Act) of 1985
- 1996: City adopts Vision 2025 "Naples Key Challenge: Enhancing a Quality City"
- 2007: City adopts "Preserving Naples" Vision Plan
- 2018: City amends the Comprehensive Plan to address changes in Florida Statutes through the Evaluation and Appraisal Report process
- 2020: City adopts Naples Vision Document, "Our Community's Vision for the Future"
- 2024: City amends the Comprehensive Plan to include a new Vision Element and to address changes in Florida Statutes through the Evaluation and Appraisal Review process
- 2025-2026: City considers elective updates to Comprehensive Plan to incorporate initiatives and priorities of Vision Element

MONITORING AND EVALUATING PLAN EFFECTIVENESS[3]

The planning process does not end with the adoption of the ~~entire p~~Plan. The next step is implementation~~. Implementation mechanisms~~, which takes the form of ~~objectives, policies,~~ actions that include development standards, ~~and~~ special studies, intergovernmental agreements, new planning programs, capital investments, and other initiatives that are contained in the separate elements of the Plan. ~~A specific time frame has been established for each implementation mechanism.~~

Effectiveness of the Plan is measured through various feedback and monitoring mechanisms to measure, control, and balance the system. The following feedback mechanisms are contained within the Plan and are described further in the following sections:

a. Review the actions identified in the Plan on a regular basis and determine implementation efforts based on available staff capacity and project funding resources.

~~a.~~b. Monitor level of service standards as related to the need for public facilities and applicable capital improvements. This will be done on an annual basis and updated to effectively provide public facility needs.

~~b.~~c. Annually review and revise the Capital Improvements Program of the City, to carry out and fund the policies, programs and associated projects. ~~Capital Improvement Element updates will be coordinated with the annual review of neighborhood plans.~~[4]

~~c.~~d. Create new and revise existing development standards to ~~carry out~~accomplish various initiatives outlined in the Plan.

~~d.~~e. ~~Provide flexibility in plan design to allow for adaptation to changing conditions.~~[5] Appropriate amendments should be considered from time to time~~-~~ to~~-~~ ensure that the Plan is continually responsive to changing community desires.

~~e.~~f. Review Collier County plans and codes and, regional and state ~~plans~~ regulations to ensure compatibility and consistency and ensure proper intergovernmental coordination to further common goals, objectives, and programs.

~~Annually review neighborhood plans to evaluate effectiveness, measure progress, and update as necessary.~~[6]

~~f.~~g. Prepare evaluation and appraisal ~~reports~~ reviews (EARs) at intervals as required by ~~State~~ Florida Statutes to measure the Plan's effectiveness and to make the necessary changes required to implement and further the Plan's goals.

[3] This section was added per recommendation of the PAB.

[4] Removed to address current approach for neighborhood planning (FLUE).

[5] Removed to address PABs request for clear and precise language to be adhered to.

[6] Removed to address the current approach that the Future Land Use element guides planning in neighborhoods.

ANNUAL UPDATE OF THE CAPITAL IMPROVEMENTS SCHEDULE

The Concurrency and Capital Improvements Element will be evaluated annually, and the 5-year Capital Improvements Schedule will be reviewed and updated annually in accordance with Florida Statute 163.3177(3)(b). The annual review and update of the Capital Improvements Schedule and the Concurrency and Capital Improvements Element shall coincide with the City's budget adoption process and are approved through a separate ordinance which does not require a Comprehensive Plan amendment. Those policies in other elements of the Comprehensive Plan affecting capital improvements will also be reviewed.

ANNUAL MONITORING OF LEVELS OF SERVICE

Per Naples Code of Ordinances, Section 48-7, by January of each year, lead departments will prepare Levels of Service (LOS) Reports summarizing the current LOS, LOS deficiencies, current and potential options to address LOS deficiencies through the City's capital improvements program, and other important information to support regular monitoring of LOS. Following this reporting in February each year, the City will hold a public hearing to discuss the information and the actions needed to address any shortfalls.

SCHEDULED EVALUATION AND APPRAISAL OF THE COMPREHENSIVE PLAN

In accordance with Florida Statute 163.3191, the City of Naples will evaluate its Comprehensive Plan at least every 7 years to determine if any amendments are needed to reflect the minimum planning period or changes in state requirements since the last plan update. If it is determined that Comprehensive Plan amendments are necessary, the City shall prepare and transmit the proposed amendments within one year.

KEY PERFORMANCE INDICATORS

As part of implementation, Naples will identify key performance indicators (KPIs) for the Comprehensive Plan, the schedule for reporting to the Planning Advisory Board and City Council on the status of KPIs, and the responsible City leads for tracking and evaluating over time.

Many local governments often use the annual budget for documenting KPIs. This offers the opportunity to document the linkage between operational budget requests and capital improvement program projects and the Goals, Objectives, Policies, and Actions of the Plan they support. It is also recommended that KPIs leverage available data that is updated regularly either through normal City operations, regional or state data analyses, or Federal Census or related data and trend analyses.

~~**Evaluation and Appraisal Report**~~

~~The local planning process is not static. It is continuous, evolving, and ongoing. As such, the Comprehensive Plan is audited from time to time.~~

Pursuant to Chapter 163.3191, F.S., and 9J-5.0053, F.A.C., the City completed an Evaluation and Appraisal Report (EAR) of the 1998 Comprehensive Plan during 2006.

In summary, the EAR is a report card to measure the performance of the City's Comprehensive Plan over the past seven (7) years and serves to:

a. Assess the Comprehensive Plan's performance in relation to the accomplishment of established goals, objectives, policies and programs.

b. Identify changing conditions in the community.

c. Determine whether the Plan provides sufficient guidance to the local government regarding land development regulations.

d. Allow for updates to the Plan to reflect changes in state and regional policies on planning and growth management.

In addition, the EAR process establishes the framework for future updates, revisions, and studies in order to ensure that the Plan continues to provide sufficient guidance to the City regarding land development decisions.

To complete the 2007 EAR the City of Naples held a series of public meetings to gather input from the community. The Planning Advisory Board (PAB) was the lead entity in the Evaluation and Appraisal Report public meeting process. A draft of the EAR was provided to the PAB, City Council and interested community residents in December 2004. Copies of the draft document were made available free of charge to the public at the following locations:

Planning Department — Naples City Clerk

295 Riverside Circle — 735 8th Street South

Naples, Florida 34102 — Naples, Florida 34102

A revised draft was subsequently prepared and presented to the Planning Advisory Board and City Council in October and November, 2005.

The Planning Advisory Board, City Planning staff and City Council held the following meetings in 2004, 2005, and 2006.

Date	Location	Comment
March 10, 2004	City Hall Council Chambers	PAB Meeting
March 26, 2004	City Hall Council Chambers	PAB Workshop
April 14, 2004	City Hall Council Chambers	
May 12, 2004	City Hall Council Chambers	

~~May/June 2004~~	~~City Hall Council Chambers~~	~~Major Issues~~
~~October, 2004~~	~~City Hall Media Room~~	~~President's Council~~
~~November 10, 2004~~	~~City Council Chambers~~	~~PAB Workshop update~~
~~November 15, 2004~~	~~City Hall Council Chambers~~	~~City Council Workshop~~
~~December 8, 2004~~	~~City Hall Council Chambers~~	~~PAB~~
~~June, 2005~~	~~City Hall Council Chambers~~	~~City Council to review schedule for completion~~
~~September 13, 2005~~	~~City Hall Council Chambers~~	~~PAB Workshop to review draft EAR - Continued to October 13, 2005~~
~~October 13, 2005~~	~~City Hall Council Chambers~~	~~PAB Workshop to review draft EAR~~
~~November 9, 2005~~	~~City Hall Council Chambers~~	~~Planning Advisory Board Public Hearing~~
~~November 14, 2005~~	~~City Hall Council Chambers~~	~~City Council Workshop to review draft EAR~~
~~May 17, 2006~~	~~City Hall Council Chambers~~	~~City Council Hearing - Transmittal of Proposed EAR to DCA~~
~~October 18, 2006~~	~~City Hall Council Chambers~~	~~City Council Hearing - Adoption of EAR~~

COMMUNITY PROFILE

[This entire section was moved from the Future Land Use Element and updated to reflect current data and trends]

Florida Statutes Section 163.3177(5) requires that local government comprehensive plans include at least two planning periods: a short-term planning horizon of ten years and a long-term horizon of twenty years. The data collected and analyzed for the Naples 2045 Comprehensive Plan include population projections through the years 2035 and 2045. In accordance with Florida Statutes Section 163.3177(1)(f)2., the data used in this analysis are derived from professionally accepted sources and based on a professionally accepted methodology.

This section provides an overview of the City demographics, including population estimates and projections, income, age, race and ethnicity. It also includes a summary of the data analyzed and reviewed for each Comprehensive Plan element. These studies, surveys, and data provide the technical foundation for the development of the Goals, Objectives, Policies, and Actions set forth in the Plan.

POPULATION ESTIMATES, PROJECTIONS, AND DEMOGRAPHICS

Comprehensive plans are designed to ensure that local governments have designated allowable future land uses and density levels and have anticipated the provision of adequate public facilities, to accommodate the anticipated population over the 10- and 20-year planning period. For planning public facilities, Florida Statutes section 163.3180 provides that solid waste,

drainage, and potable water and wastewater (sanitary sewer) are the only public facilities and services subject to concurrency requirements on a statewide basis.

To determine anticipated population, comprehensive plans are required to account for permanent and seasonal population estimates and projections. The source for population estimates and projections must be either those published by the Office of Economic and Demographic Research or generated by the local government based upon a professionally acceptable methodology.

Another hallmark of comprehensive planning is to coordinate the several elements of the plan to be based upon consistent data. It is recognized in Florida Statute Section 163.3177 that alternative data, including for population estimates and projections, can be justified. For the Naples 2045 Comprehensive Plan and associated land use and capital improvement planning, the following sources of data for **permanent population estimates and projections** are recognized:

- The Future Land Use Element and Map is based upon permanent population estimates for Naples by the Bureau of Economic and Business Research (BEBR), University of Florida, April 1, 2024 published on the Office of Economic and Demographic Research website. Permanent population projections are based upon projections for Naples published by the Shimberg Center for Housing Studies, derived from 2010 and 2020 U.S. Census data and population projections by BEBR.
- For areas served by the City's Water and Wastewater Utilities, permanent population estimates and projections are based upon demographics from the 2020 Census modeled by Metro Forecasting Models per a state-accepted methodology used to evaluate system capacity at maximum occupancy within the service area.

Florida Statutes Section 163.3164 and the City of Naples Code of Ordinances define "seasonal population" as part-time inhabitants who use, or may be expected to use, public facilities or services, but are not residents and includes tourists, migrant farmworkers, and other short-term and long-term visitors. The Office of Economic and Demographic Research does not publish seasonal population estimates or projections, and the Census does not report seasonal populations. For determining **seasonal population and projections** for the Naples 2045 Comprehensive Plan and associated land use and capital improvement planning, the following methods of are recognized:

- The Future Land Use Element and Map assumes seasonal population is estimated to be 20% of the permanent population, consistent with the methodology used by Collier County for comprehensive planning purposes. These seasonal population estimates and projections assume population within residentially designated properties for population accommodation purposes, and do not include transient visitors in hotels, which are commercially designated.
- For areas served by the City's Water and Wastewater Utilities, seasonal population is estimated based upon demographics from the 2020 Census modeled by Metro Forecasting Models per a state-accepted methodology used to evaluate system capacity at maximum occupancy within the service area. This model includes transient visitors in

hotels in the estimated and projected seasonal population to plan for service demands generated by both residential and non-residential uses.

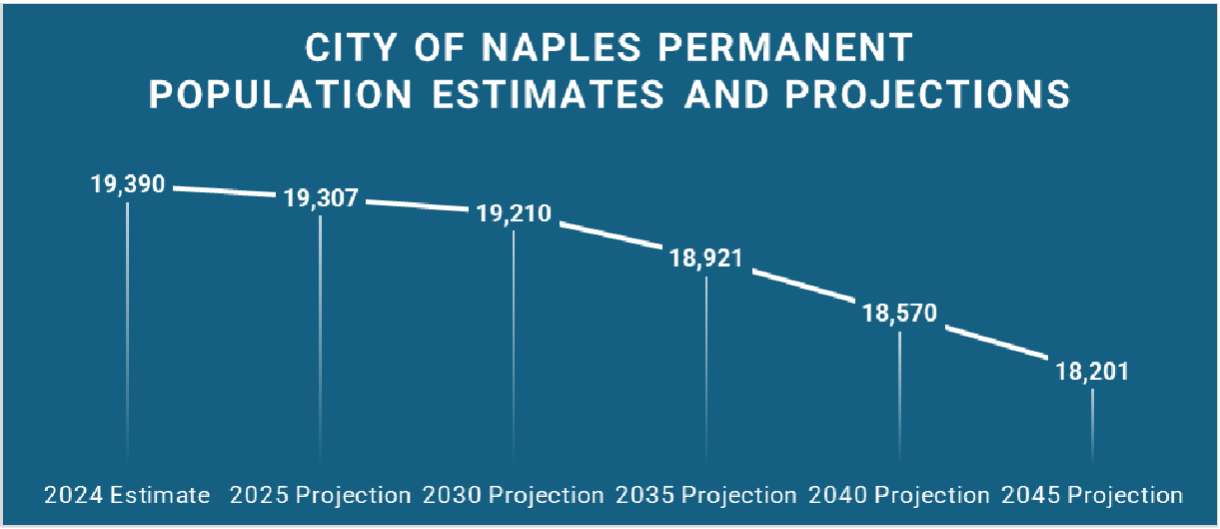
The City of Naples is within one of the fastest growing counties in the United States; however, despite steady countywide permanent population growth, the 2010 and 2020 Census data and projections published by the Shimberg Center for housing Studies indicate **permanent population** in Naples is decreasing. As of the 2020 U.S. Census, the population was 19,115, down from 19,539 at the 2010 U.S. Census. Permanent population in the City is expected to continue decreasing at a moderate pace throughout the 10- and 20- year planning horizon. The City's anticipated permanent population decline may be attributed to physical limitations on population growth, decreases in average household size, progression of an aging population, significantly high median household income, an increasing number of seasonal housing units, and limited developable vacant land.

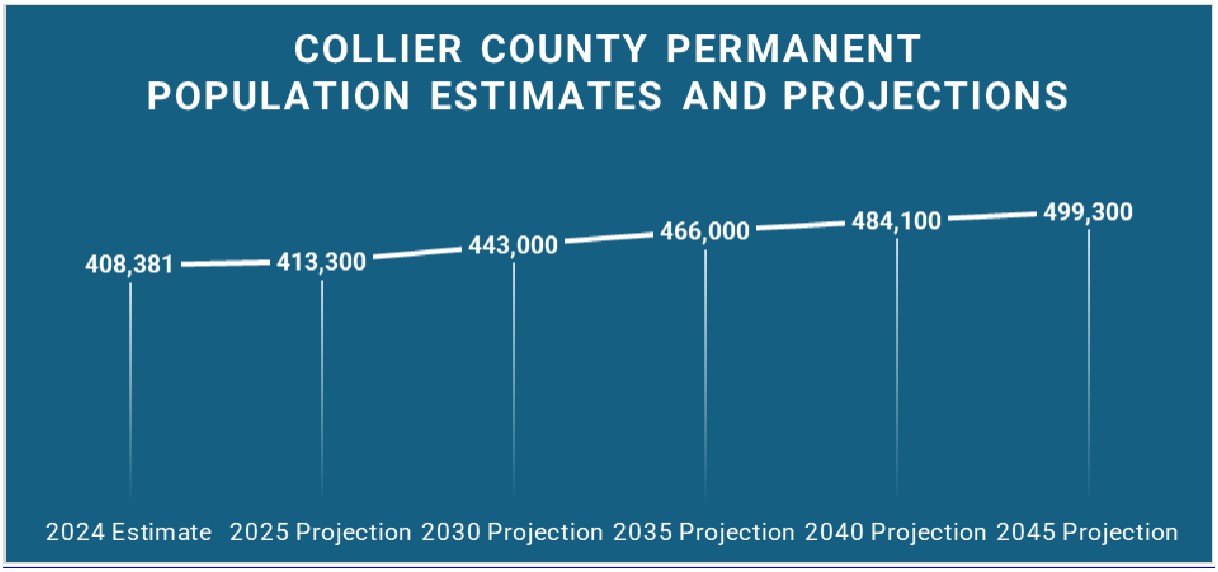
Permanent Population Estimates and Projections

	2024 Estimate	2025 Projection	2030 Projection	2035 Projection	% Change (2024-2035)	2040 Projection	2045 Projection	% Change (2024-2045)
City of Naples	19,390	19,307	19,210	18,921	-2.4%	18,570	18,201	-6.1%
Collier County	408,381	413,300	443,000	466,000	14.1%	484,100	499,300	22.3%

Notes: Counts refer to estimated or projected number of persons.

Sources: Estimates by the Bureau of Economic and Business Research (BEBR), University of Florida, April 1, 2024; City projections by Shimberg Center for Housing Studies, based on 2010 and 2020 U.S. Census data and population projections by BEBR. Countywide projections based on BEBR Medium Range growth rate projections, Volume 57, Bulletin 198, January 2024.





Permanent population estimates and projections only include the number of people who reside within the City on a year-round basis and excludes seasonal or transient populations. When planning for future development and for the provision of services, careful consideration should be made to ensure that it is based on a total population to be served within the planning period and not merely full-time residents.

Although the Census does not collect **seasonal population** data, seasonal *housing unit* information, or vacant housing units "for seasonal, recreational, or occasional use," is provided which could be used to determine a total maximum population. As shown in the table below, "seasonal units" represent a significant percentage of housing units in the City. According to the 2023 American Community Survey 5-year estimates, the City of Naples has an estimated total of 18,720 housing units in 2023. Of these total housing units, 9,780 (52%) are occupied and 8,930 (48%) are vacant. Most of these vacant housing units, 7,539 (or 40% of all housing units), are classified as "vacant units for seasonal, recreational, or occasional use." To determine how many additional seasonal residents this may represent, the number of seasonal housing units was multiplied by the average household size for the City which has varied from 1.88 persons per household in 2010, up to 2.05 persons per household in 2020, and estimated to be 1.94 persons per household in 2023. Adding the estimated *seasonal* population to the *permanent* population yields a total population estimate within the City.

City of Naples Housing Occupancy and Permanent and Seasonal Population Estimates

	2010	2020	2023 (estimate)
Total Housing Units	17,753	18,225	18,720
Occupied Housing Units	10,231 (58%)	9,823 (54%)	9,790 (52%)
Vacant Housing Units	7,522 (42%)	8,402 (46%)	8,930 (48%)

	2010	2020	2023 (estimate)
Seasonal Housing Units	5,830 (33%)	7,292 (40%)	7,539 (40%)
Other Vacant	1,692 (9%)	1,110 (6%)	795 (4%)
Average Household Size	1.88	2.05	1.94
Estimated Seasonal Population	10,960 (36%)	14,949 (44%)	14,626 (43%)
Permanent Population	19,537 (64%)	19,115 (56%)	19,421 (57%)
Total Population - Estimated Permanent + Seasonal	30,497	34,064	34,047

Notes: Counts refer to estimated number of housing units

Sources: American Community Survey, ACS 5-year Estimates Data Profiles, Tables DP04, B01003, B25010, and B25004, Year 2023; American Community Survey, ACS 5-year Estimates Data Profiles, Tables B25010, Year 2020; U.S. Census Bureau, Decennial Census, DEC Demographic and Housing Characteristics, Tables H1 and H5, Year 2020; U.S. Census Bureau, Decennial Census, DEC Summary File 1, Tables H1, H5, and H12, Year 2010.

The "Total Population-Estimated Permanent + Seasonal" indicates approximately 34,000 full- and part-time residents are in Naples during seasonal periods that typically occur in the time of year between Thanksgiving and Easter. Although this is valuable information, it is an estimate of the *potential maximum* population which assumes that permanent and seasonal residents are all staying in Naples at the same time and duration of visit. For planning purposes and in compliance with state statutes, the City utilizes *peak season* population estimates and projections for analysis through the extended planning period.

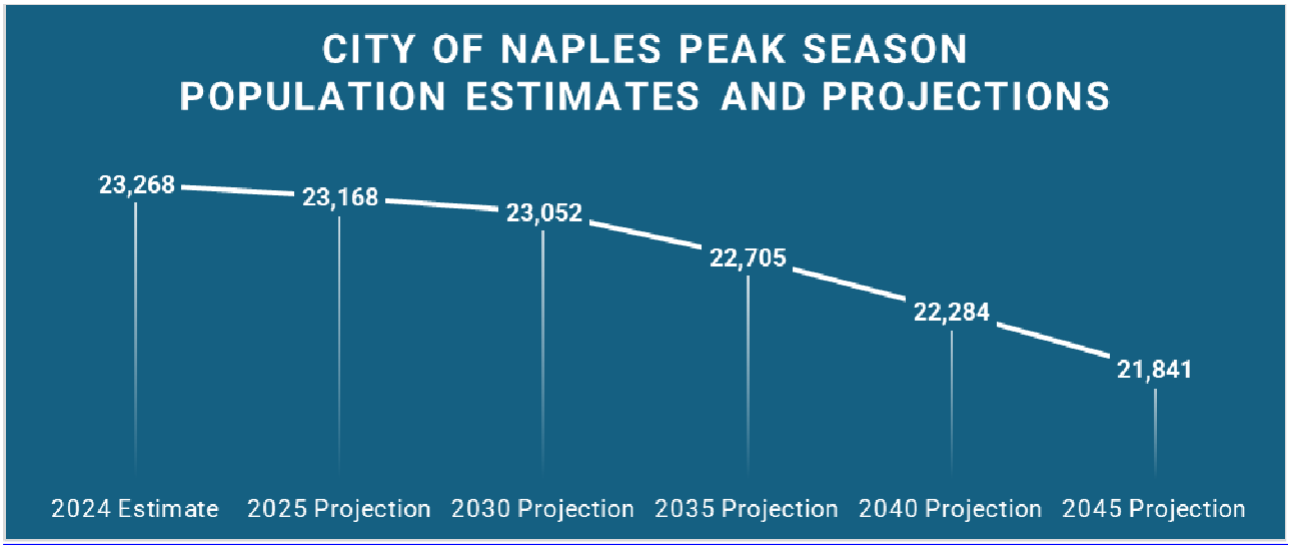
Peak season population estimates and projections for Naples for the 10- and 20- year planning horizon have been derived for planning purposes by assuming the *permanent* population projections increase by a factor of 20% (.20), which is consistent with the methodology used by Collier County. This results in a projected decline in peak season population aligning with the trajectory of the permanent population decline.

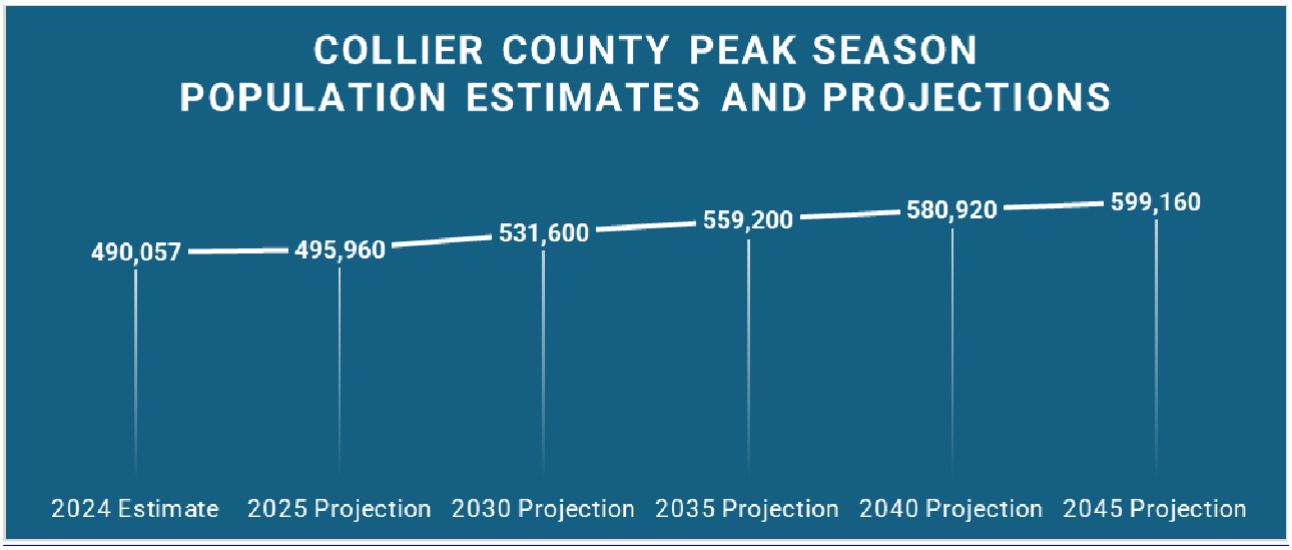
Peak Season Population Estimates and Projections

	2024 Estimate	2025 Projection	2030 Projection	2035 Projection	2040 Projection	2045 Projection
City of Naples	23,268	23,168	23,052	22,705	22,284	21,841
Collier County	490,057	495,960	531,600	559,200	580,920	599,160

Notes: Counts refer to estimated or projected number of persons.

Sources: Estimates by the Bureau of Economic and Business Research (BEBR), University of Florida, April 1, 2024 by 20%; City projections are derived by increasing the permanent population projections prepared by the Shimberg Center for Housing Studies (based on 2010 and 2020 U.S. Census data and population projections by BEBR) by 20%. Countywide projections based on BEBR Medium Range growth rate projections, Volume 57, Bulletin 198, January 2024, increased by 20%.





While the typical assumption has been that the City's permanent population increases by 20% to determine the seasonal population, the trends in recent years reveal that a shift is underway. The total housing units in the City have been increasing (18,225 housing units in 2020 increase to an estimated 18,720 in 2023 per the American Community Survey). Furthermore, seasonality is trending upward (33% in 2010; 40% in 2020 per the seasonal housing unit counts reported by the Census). While persons per household is trending down (2.05 persons per household in 2020 is estimated to reduce to 1.94 persons per household in 2023), the higher degree of households being occupied in season has potential for a more extreme peak season population than the traditionally assumed 20% increase over permanent population. The typical

assumptions yield a projected decrease in peak season population over time; however the City should closely monitor the trends in seasonal occupancies and total housing units as part of the efforts to continually evaluate and identify land use and facilities needed to accommodate the projected seasonal population in 2045.

Income

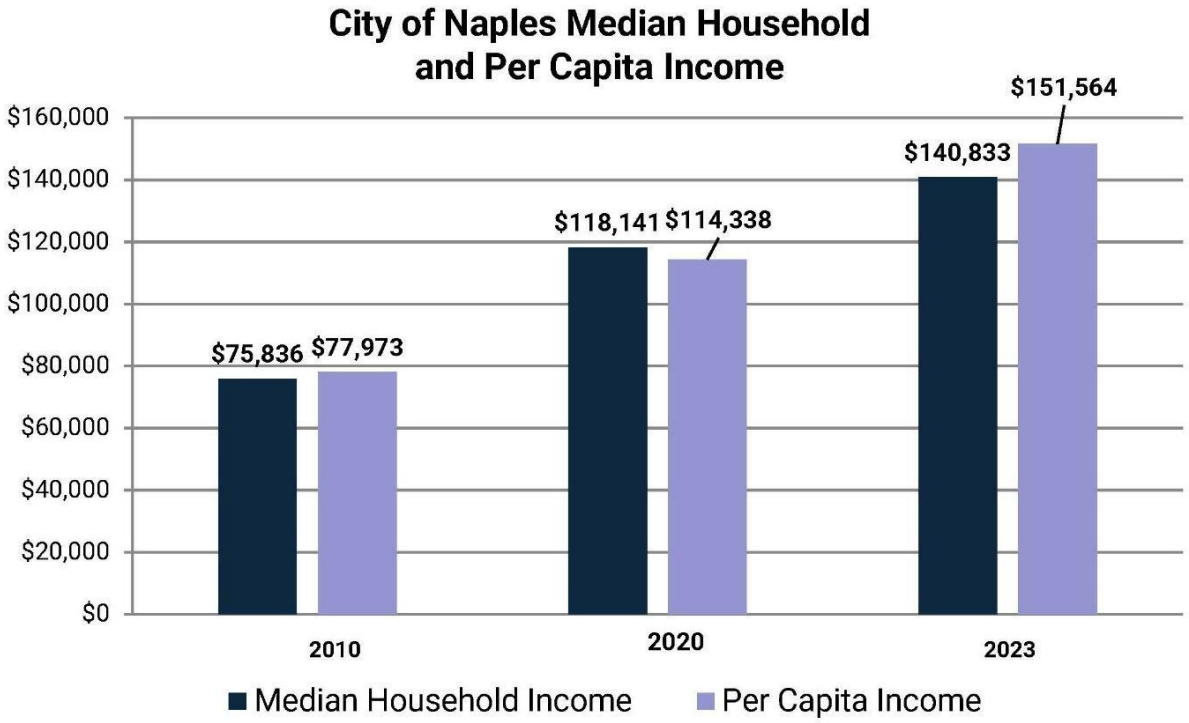
Income data was obtained from the U.S. Census Bureau, American Community Survey, ACS 5-year estimates detailed tables for 2010, 2020 and 2023. The median household income in Naples in 2023 dollars, was $140,833 with only 7.1% of the population considered below poverty level. The per capita income was $151,564, nearly 3.5 times the State's per capita income of $41,055. Meanwhile, the 2023 Collier County median household income was $86,173 and per capita income was $59,973. Approximately 10.5% of the Collier County population and 12.6% of all people in Florida are considered below poverty level. Since 2010, median household income in Naples has increased approximately 86% and income per capita has increased 94% while Countywide income growth has been more modest, with increases of 48% for median household income and 62% for per capita income. The discrepancy in income increases between the City and County is likely due to growth in the County and displacement of workforce housing with redevelopment and gentrification. As property values increased closer to the Gulf, workforce personnel, particularly larger family households, appear to be relocating outside of the City limits.

City of Naples Income and Poverty

	2010	2020	2023
Median Household Income	$75,836	$118,141	$140,833
Per Capita Income	$77,973	$114,338	$151,564
Percent of Population below Poverty Level	7.6% (2012)	7.6%	7.1%

Notes: In inflation-adjusted dollars.

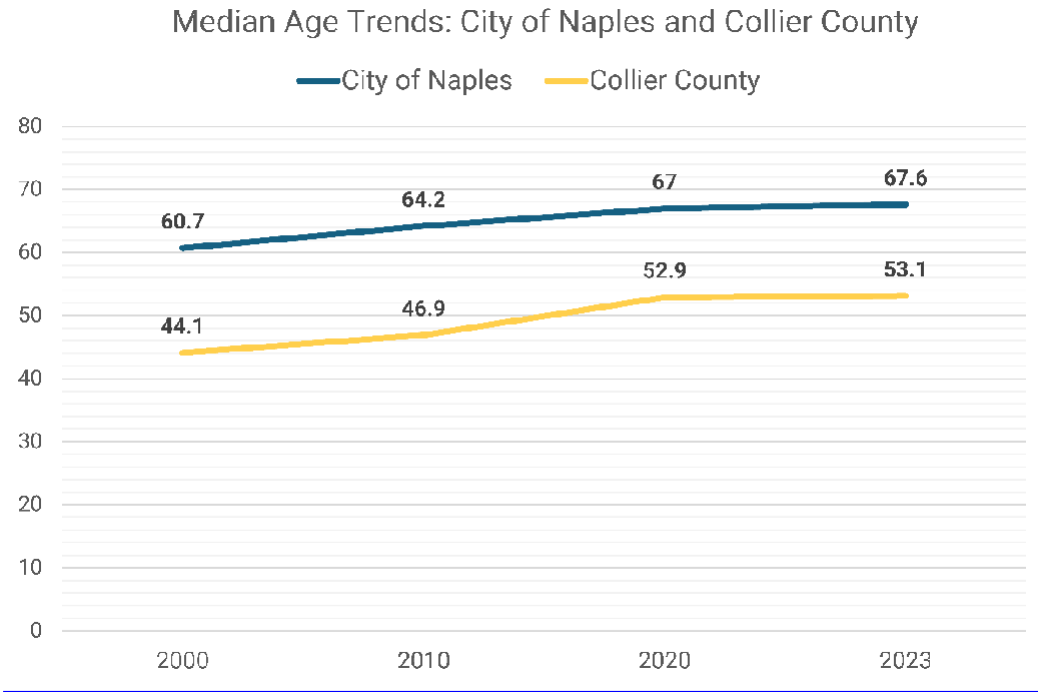
Sources: American Community Survey, ACS 5-year Estimates Data Profiles, Tables B19301, S1903, and S1701, Years 2010, 2012, 2020, 2023.



Sources: American Community Survey, ACS 5-year Estimates Data Profiles (2010, 2020, 2023).

Age

The latest population estimates indicate that the majority of people in the City are retirees and a very small fraction of the population are children. While the median age in the City in 2000 was 60.7 years, the Census reports the median age increased to 64.2 years in 2010 and 67.0 years in 2020. In 2023, the median age increased to 67.6 years. In the County, the median age in 2000 was 44.1 years, and increased to 46.9 years in 2010 and 52.9 years in 2020. In 2023, the median age increased to 53.1 years. Senior residents age 65 and older accounted for 42% of the City's 2000 population compared to 48.5% in 2010 and 54.8% in 2020. As of 2023, 56.2% of Naples' population is now over 65 years of age and 8.7% are under 18 years of age. Countywide, the percentage of residents over 65 increased from 24.5% in 2000 to 25.1% in 2010 and 32.6% in 2020. In 2023, this increased to 33.6% over 65 years of age and 16.4% under 18 years of age. Although the percentage of senior residents in the County has modestly increased, population within the various age categories is fairly balanced.



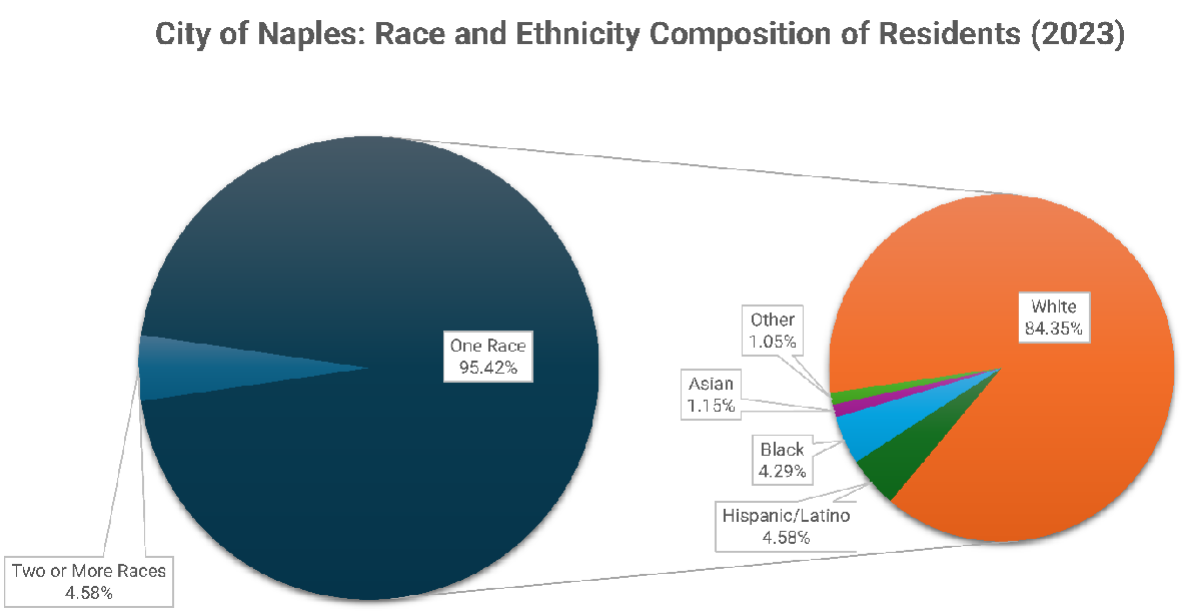
Source: American Community Survey, ACS 5-year Estimates Data Profiles, Table S0101(2000, 2010, 2020, 2023)

Average Household Size

The City's average household size grew from 1.92 in 2000 to 2.02 in 2010 and 2.05 in 2020, before declining to 1.94 in 2023. In comparison, the average household size in Collier County was 2.39 in 2000, increased to 2.63 in 2010, slightly decreased to 2.54 in 2020, and dropped to 2.38 in 2023. Naples' notably low average household size, combined with a steadily aging population, may help explain the projected slowdown in the City's permanent population growth, whereas Countywide population projections anticipate continued increases.

Race & Ethnicity

The racial and ethnic makeup of the City's population has remained relatively stable over the last twenty years. According to the 2000 Census, 92.5% of residents were White, 4.6% were Black, and 2.9% were classified as "other". By 2020, over 95.8% of residents identified with a single race, while 5.2% identified with two or more races. Among those reporting one race, 94.4% were White, 2.8% were Black, 1.1% Asian, and 1.7% were "other." More recent 2023 ACS 5-year estimates indicate that 95.4% of the City's population identify with one race, and 4.6% with two or more races. Of those identifying as one race alone, 84.4% are White, 4.3% Black, 1.2% Asian, and 1.1% "other." Approximately 4.6% of Naples residents identify as Hispanic or Latino of any race.



Sources: American Community Survey, ACS 5-year Estimates Data Profiles, Table DP05 (2020).

FUTURE LAND USE

The Goals, Objectives, Policies, and Actions outlined in the Future Land Use Element were developed in accordance with applicable Florida Statutes and are informed by relevant studies, surveys, and data.

According to the 2022 Collier County Economic, Demographic & Community Profile, Collier County is the largest county in Florida by land area, encompassing approximately 1,998 square miles, and ranks fourth in total area. In contrast, the City of Naples exhibits a more compact, urban development pattern. The City covers a total of 16.4 square miles, including 12.3 square miles of land and 4.1 square miles of water (approximately 25.1% is water). As of 2020, Naples had a population density of 1,553.6 persons per square mile, compared to 188.2 persons per square mile in Collier County. Current estimates indicate a slight increase in density to 1,576.4 persons per square mile in Naples and approximately 204.4 persons per square mile in the County.

The table below summarizes land area distribution within the City by Future Land Use Map designation. As depicted, more than one-third of Naples' land area is classified as "Low Density Residential" making it the predominant classification. In total, nearly 52% of the City's land is designated for residential use, with an additional 5.7% classified as "Commercial Mixed Use". The next largest category - "Public, Semi-Public and Private Recreation and Open Space"- accounts for over 13% of the total land area. Given the City's largely built-out condition and anticipated slower population growth, existing land use designations are expected to

adequately accommodate projected population levels over both the 10-year and 20-year planning horizons.

Future Land Use Map Designation	Acres	%
Residential: Beach Front Estates	53.99	0.67%
Residential: Low Density	2,892.23	35.81%
Residential: Medium Density	720.82	8.92%
Residential: High Density	536.92	6.65%
Residential: Mobile Home	6.82	0.08%
Residential: Senior Living	22.06	0.27%
Commercial: Highway	447.70	5.54%
Commercial: Limited	63.08	0.78%
Commercial: Waterfront Mixed Use	61.72	0.76%
Commercial: Airport	650.56	8.05%
Commercial: Downtown Mixed Use	396.74	4.91%
Commercial: Business Park	111.56	1.38%
Public, Semi-Public Institutional	212.83	2.64%
Public, Semi-Public and Private Recreation and Open Space	1,063.40	13.17%
Conservation	836.50	10.36%
TOTAL	8,076.93	100.00%

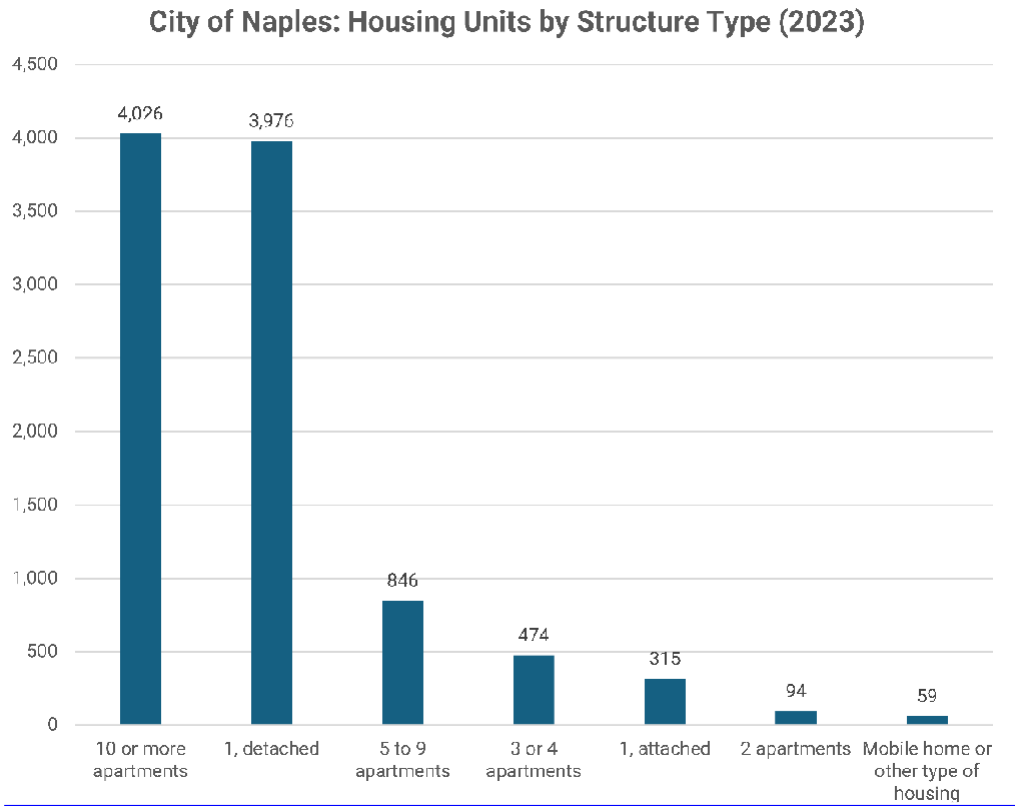
Source: City of Naples Information Technology Services GIS, April 2024.

HOUSING

The Goals, Objectives, Policies, and Actions in the Housing Element were developed in compliance with applicable Florida Statutes and are based on relevant studies, surveys, and data.

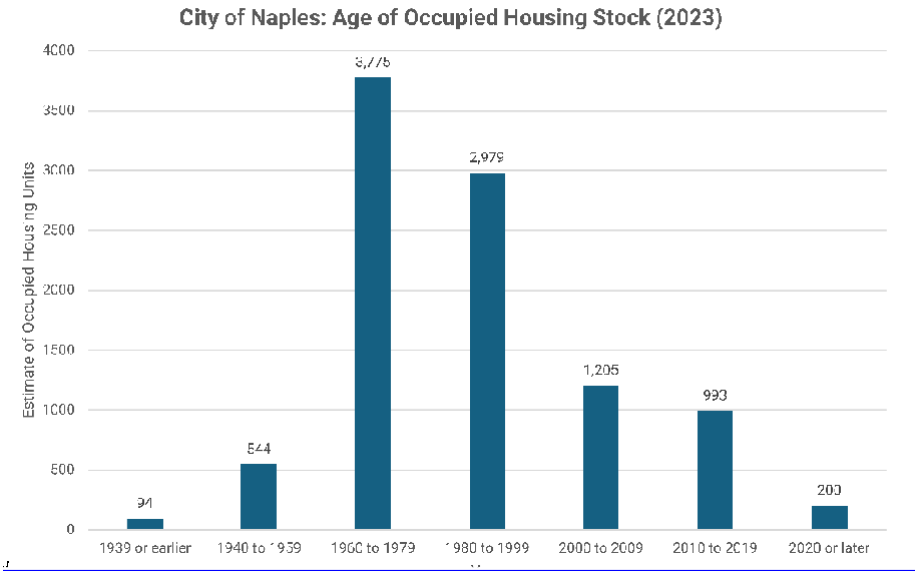
In 2023, the City had an estimated 18,720 housing units, of which, 9,790 (52%) were occupied and the remainder were classified as vacant, including seasonally vacancies. Among occupied

units, 40.6% are single-family detached homes and 41.1% are multifamily apartments with ten or more units.



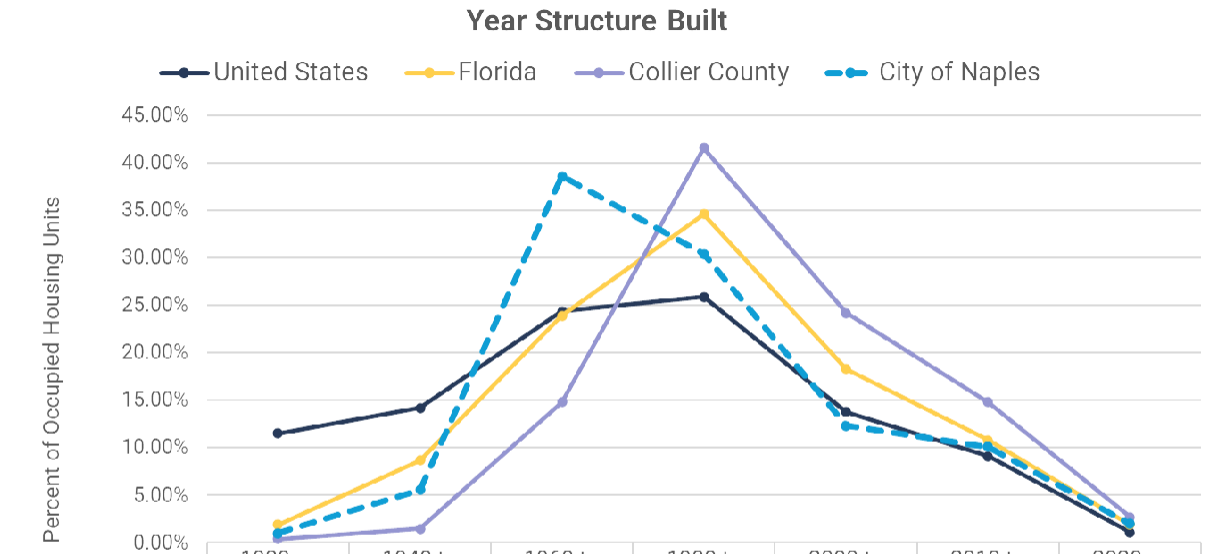
Source: American Community Survey, ACS 5-Year Estimates Data Profiles, Table S2504: Physical Housing Characteristics for Occupied Housing Units, Year 2023.

The majority of homes (69%) in the City were built between 1960-1979 (38.6%) and 1980-1999 (30.4%).



Source: American Community Survey, ACS 5-Year Estimates Data Profiles, Table S2504: Physical Housing Characteristics for Occupied Housing Units, Year 2023.

This decline in housing construction over time mirrors broader statewide and national trends. On average, homes in the City are slightly older than those in Collier County, the State of Florida, and across the nation. This pattern highlights Naples' largely built-out condition and underscores the importance of prioritizing redevelopment focused policies.



	1939 or earlier	1940 to 1959	1960 to 1979	1980 to 1999	2000 to 2009	2010 to 2019	2020 or later
United States	11.50%	14.20%	24.40%	25.90%	13.80%	9.10%	1.10%
Florida	1.90%	8.70%	23.90%	34.60%	18.30%	10.80%	1.90%
Collier County	0.40%	1.50%	14.80%	41.60%	24.20%	14.80%	2.70%
City of Naples	1.00%	5.60%	38.60%	30.40%	12.30%	10.10%	2.00%

Source: ACS 2023, Table S2504: Physical Housing Characteristics for Occupied Housing Units.

CONSERVATION AND COASTAL MANAGEMENT

The Goals, Objectives, Policies, and Actions of the Conservation and Coastal Management Element are based on a range of technical studies, environmental data, and planning documents. Key sources include applicable flood data; information incorporated in the forthcoming update to the City's Stormwater Master Plan; the Surface Water Improvement Management (SWIM) Plan for Naples Bay; the Coastal Resources map; and data on existing coastal and environmental conditions, environmentally sensitive habitats, and hazard mitigation. Additional input is drawn from other statutorily required studies and supporting materials.

RESILIENCY

Data and analyses that informed the Goals, Objectives, Policies, and Actions of the Resiliency Element include the City of Naples Critical Assets and Facilities Vulnerability Assessment (2023); the City of Naples Critical Assets and Facilities Adaptation Plan (2024); the forthcoming update to the City's Stormwater Master Plan; the Naples Green Print (2024); and related regional resiliency, beach, dune and shoreline studies and plans.

PUBLIC FACILITIES AND WATER RESOURCES

Development of the Goals, Objectives, Policies, and Actions of the Public Facilities and Water Resources Element relied on a variety of technical studies, infrastructure plans, and supporting

documentation. These include public facility master plans; the City of Naples Water Distribution System Master Plan; basin-wide master drainage master plans, water reuse feasibility evaluations and planning efforts; the City's Sanitary Sewer and Wastewater System Master Plan; and implementation programs such as the City's septic tank replacement initiative. The Element also incorporates findings from regional efforts led by Collier County, along with other data and materials required by statute.

TRANSPORTATION

The Goals, Objectives, Policies, and Actions of the Transportation Element are supported by a range of data and planning efforts, including regional and state transportation plans such as the Florida Department of Transportation (FDOT) Five-year Transportation Plan; the Collier County Long Range Transportation Plan (LRTP), the Collier Metropolitan Planning Organization (MPO) Transit Plan, and the Naples Pedestrian and Bicycle Master Plan. Additional resources considered include; regional and local corridor planning studies, applicable master plans, the 10-year and 25-year financially feasible transportation plan alternatives; and other statutorily required data and documentation.

PARKS, RECREATION, AND OPEN SPACE FACILITIES

The Goals, Objectives, Policies, and Actions of the Parks, Recreation, and Open Space Element are shaped by a combination of statutory requirements, community input, and supporting data, including the inventory of parks, recreational amenities, and open space facilities summaries below. The City is also actively updating its Parks and Recreation Master Plan, which will help guide future enhancements, expand recreational opportunities, and ensure the continued vitality of the Naples' park system.

Naples is widely recognized for its exceptional network of parks, recreational amenities, and public open spaces that enhance quality of life for residents and visitors alike. This system currently features more than 102 acres of community parks, 23 acres of neighborhood parks, and 28 acres of linear and mini parks reflecting the City's ongoing commitment to accessible, high-quality recreational experiences.

Parks, Recreation and Open Space Facilities	Acres
Community Park Lands	
Baker Park	15
Cambier Park	12.84
Fleischmann Park	25.26
Gordon River Greenway	19.45
Lowdermilk Park	10.3
Naples City Dock	0.65
Naples Dog Park	4.27
Naples Landing	3.81

Parks, Recreation and Open Space Facilities	Acres
Naples Pier	0.73
Naples Preserve & the Hedges Eco Center	9.79
Total Community Park Lands	**102.1**
Neighborhood Park Lands	
Charlie C. Anthony Park	7.00
River Park	1.61
Seagate Park	15.09
Total Neighborhood Park Lands	**23.70**
Linear Parks and Mini Parks	
8th Ave S	0.26
Alligator Lake East Mini Park	0.18
Alligator Lake West Mini Park	0.33
Betsy Jones Mini Park	3.89
Bowline Mini Park	0.78
Broad Ave South Linear Park	4.05
Cambridge Perry Park	0.33
Coconut Point Mini Park	0.21
Goodlette Frank Linear Park	5.2
Gordon Drive Linear (Riley Park)	1.16
Lois Selfon Park	0.5
Lord Horatio Nelson Mini Park	1.37
Menefee Mini Park	0.07
Merrihue Mini Park	0.09
Orchid Banyan Linear Park	7.17
Putter Point Mini Park	0.08
Rodgers Mini Park	0.34
Sandpiper Mini Park	0.6
Seagate-Crayton Rd Linear Park	1.56
Total	**28.17**

Inventory of Recreational Facilities	#
Baseball Fields • Cambier Park (1) • Fleishmann Park (4)	5
Basketball Courts • Anthony Park (1) • Cambier Park (1) • Fleischmann Park (2) • River Park (1)	5
Boat Launch/Ramps • Naples Landing	3
Community Centers • Anthony Park (1) • Baker Park (1) • Cambier Park (1) • Fleishmann Park (1) • River Park (1)	5
Football Fields • Anthony Park (1) • Fleishmann Park (2)	3
Picnic Areas • Anthony Park (7) • Baker Park (4) • Cambier Park (1) • City Dock (1) • Fleishmann Park (6) • Lowdermilk Park (3) • Naples Landing (4) • River Park (1) • Seagate Park (3)	30

Inventory of Recreational Facilities	#
Play Areas (Playgrounds) • Anthony Park (1) • Baker Park (3) • Cambier Park (1) • Fleischmann Park (1) • Lowdermilk Park (1) • Naples Landing (1) • River Park (1)	9
Swimming Pools • River Park (1)	1
Tennis Courts • Anthony Park (1) • Cambier Park (12) • Sea Gate Park (2)	15
Volleyball Courts • Fleischmann Park (2) • Lowdermilk Park (2) • River Park (1)	5

INTERGOVERNMENTAL COORDINATION

The Goals, Objectives, Policies, and Actions of the Intergovernmental Coordination Element reflect a collaborative planning approach grounded in interlocal agreements, shared data, and coordinated studies. Key partners include the State of Florida, Collier County, the Southwest Florida Regional Planning Council, the Naples Airport Authority, and the District School Board of Collier County. This Element also incorporates relevant plans, technical data, and other materials required by Florida Statutes to support coordinated decision-making across jurisdictions.

CONCURRENCY AND CAPITAL IMPROVEMENTS

The Goals, Objectives, Policies, and Actions of the Concurrency and Capital Improvements Element are informed by a comprehensive set of data, analyses, and planning efforts supporting multiple elements of the Comprehensive Plan, including Future Land Use; Housing; Resiliency; Transportation; Parks, Recreation, and Open Space; and Public Facilities and Water Resources. This Element is further guided by the City's Five-year Capital Improvement Program (CIP), as amended, City of Naples Adopted Budget (2024-2025), Annual Level of Service Report (2024 &

2025), and incorporates other statutorily required data and supporting documentation to ensure coordinated infrastructure planning and fiscal responsibility.

~~HISTORICAL BACKGROUND OF PLANNING IN NAPLES~~

~~Naples has been fortunate to have had progressive city administrations that have recognized the important benefits that an ongoing and functional planning program produces in developing and maintaining a quality urban environment. The business community, land developers, various civic associations, and concerned citizens in general have also contributed greatly to the character of Naples by choosing to build attractive shopping areas, well-planned subdivisions, and distinctive residences. The combination of clean, accessible beaches, prestigious residential neighborhoods, and attractive shopping districts has created a unique resort/retirement community.~~

~~Naples' special uniqueness and charm can be attributed, in part, to its long history of comprehensive planning which began in 1952. Revisions to the original plan were made in 1961. In 1972, both the City and Collier County contracted a planning consultant to develop a Comprehensive Plan for the Naples Urban Area, which was adopted by the City in 1974. A new plan was prepared in 1979 and amended again in 1984. The Growth Management Acts of 1985 and 1986 drastically changed the requirements for local comprehensive plans. The Local Government Comprehensive Planning Act was then amended to include land development regulations and required a greater degree of inventory analysis and significant changes in objectives and policies of the plan. The state was given authority over compliance and consistency of local comprehensive plans.~~

~~Basically, sound land use patterns have been well established under the policies and controls of these past Comprehensive Plans and various zoning ordinance provisions. Efficient and economical water and sewer service, solid waste disposal, parks and recreation facilities, and other amenities have been provided as a result of the City's commitment to careful long-range planning for these City services and facilities. The Department of Community Affairs (DCA) also established procedural rules which now require the formulation of level of service standards to plan for public facility needs. These service standards are designated in the various plan elements.~~
~~The City Council adopted Ordinance 2479 in May 1976, which designated and established the Planning Advisory Board (PAB) as the local planning agency for the City of Naples. In accordance with the Growth Management Act, that ordinance listed the duties and responsibilities of the PAB to include:~~

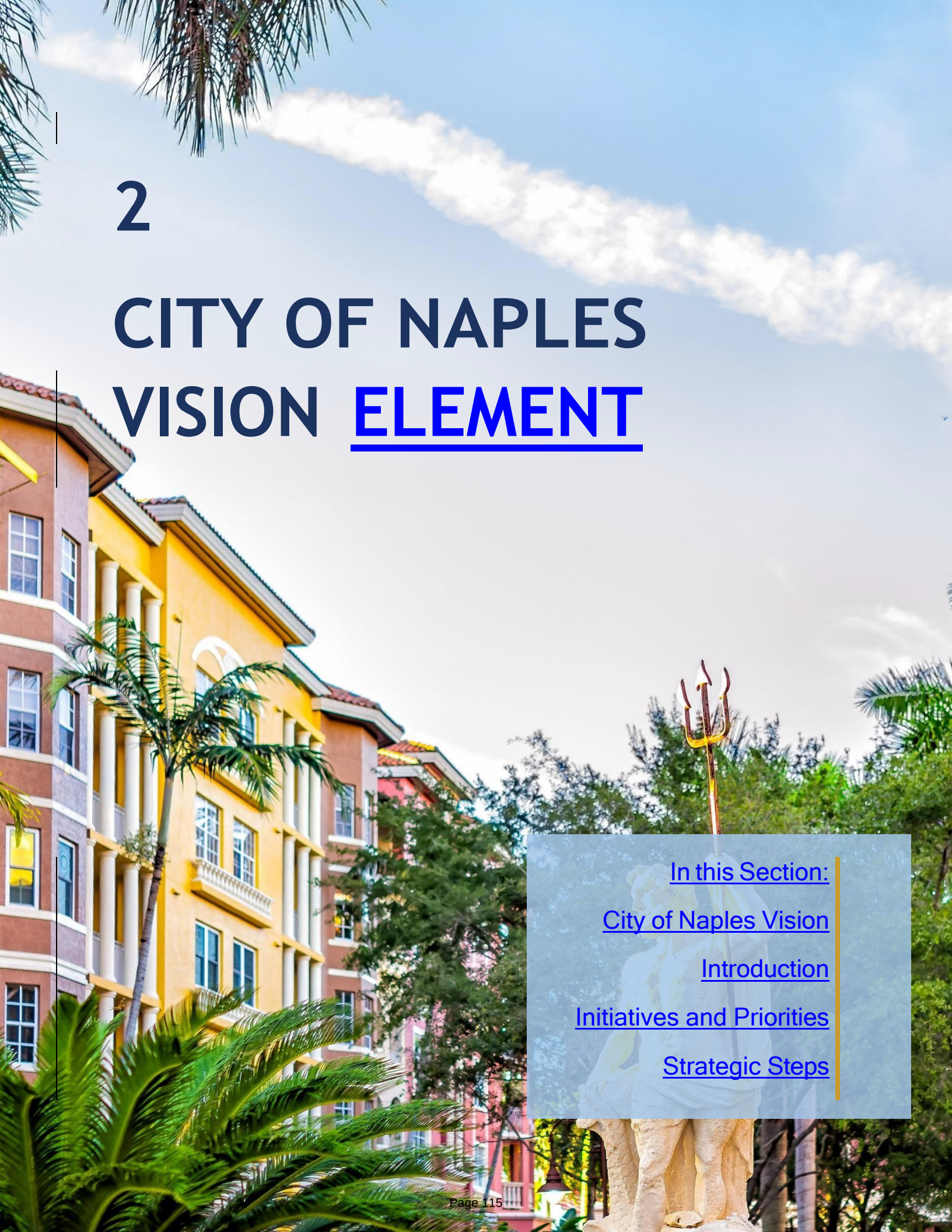
~~1. Conducting the comprehensive planning program and preparing the Comprehensive Plan or elements, or portions thereof, for the City.~~

~~2. Coordinating the Comprehensive Plan or elements, or portions thereof, with the Comprehensive Plans of other appropriate local governments and the state.~~

~~3. Recommending the Comprehensive Plan or elements, or portions thereof, to the City Council for adoption.~~

4. ~~Monitoring and overseeing the effectiveness and status of the Comprehensive Plan, and recommending to the City Council such changes in the Comprehensive Plan as may be required.~~

~~In addition to the goals, objectives, and policies required by 9J-5, the City establishes programs within each element that are also adopted. These programs are specific implementation measures to carry out policies.~~



2

CITY OF NAPLES VISION ELEMENT

In this Section:

City of Naples Vision

Introduction

Initiatives and Priorities

Strategic Steps

CITY OF NAPLES VISION

The enduring character of Naples reflects our commitment to protect and enhance the natural environment, and to preserve our small town feel and charm. These features, together with a positive business climate, sustain economic vitality. Residents place a high value on our town's unique "sense of place,"~~;~~ natural beauty, quality of life, healthy economy, and ethical government; and actively engage and defend them.

This Vision statement and the following Initiatives and Priorities were the fundamental guidance used to develop updates to the Goals, Objectives, Policies, and Actions included in the Naples 2045 Comprehensive Plan. The Vision Element is an optional comprehensive plan element per Florida Statute § 163.3177.

HOA Coalition Proposed/Recommended Vision Statement:
Naples is a vibrant and sophisticated coastal community distinguished by its exceptional quality of life, natural beauty and beaches, safety and security, distinct neighborhoods, healthy economy, small-town charm, and unique sense of place. As Naples continues to evolve and renew, it will protect these defining qualities while embracing thoughtful change, respecting individual property rights, and preparing for the needs of future generations.

Naples will continue to strengthen community resiliency, protect and enhance its natural resources, and modernize essential infrastructure. Through responsible stewardship and collaboration with local, state, and regional partners, Naples will embrace opportunities to improve mobility, expand workforce housing, adapt to a changing coastal environment, and remain a resilient, thriving community for generations to come.

~~BACKGROUND~~INTRODUCTION

In 2019, the City of Naples began a visioning process to renew this element that started with four public workshops followed by an online survey that was noticed Citywide. The process focused on assessing the 2007 Vision to determine if the City had been successful in implementation and to decide if a change in direction or priorities was warranted.

During the workshops, the participants were asked to identify the current features and issues in the City of Naples and assess them in contrast to the 2007 Vision. The attendees were requested to develop seven-word aspirational statements. These responses were included in the final assessment and were used to develop the online survey. The online survey asked respondents to rate the level of importance of each feature and issue that had been identified in the 2007 Vision and to rate their level of satisfaction as to whether the features and issues had been addressed.

Additionally, respondents were asked to choose their top ten features and issues from a list that included both the features and issues of the 2007 Vision and the additional features and issues identified during the public workshops. ~~The quantitative and qualitative results of this survey are attached hereto as Appendix A.~~

The results of the Vision Assessment concluded the residents place a high level of importance on features such as:

- The high-quality image of the City;

- The beauty and accessibility of the beaches;
- The cleanliness of the City; and
- The quality of medical care.

Regarding the issues, respondents placed a high level of importance upon the cleanup of Naples Bay and other water bodies, beach maintenance, red tide and erosion, transportation concerns, and redevelopment in the downtown including its impact on residential neighborhoods.

Among the highest levels of dissatisfaction were with the City's efforts to address transportation and traffic concerns, workforce housing, the water quality of Naples Bay, redevelopment, and beach related issues. These results provided clear direction for the City to target the following:

- Redevelopment must be measured to address the preservation of the City's character;
- Environmental issues such as the impact of stormwater runoff on water bodies and an emphasis on the preservation of the beaches and natural water bodies; and
- Community impacts to the residents of governmental actions.

The respondents indicated these goals be accomplished without negatively impacting the City's economy.

As part of the Naples 2045 Comprehensive Plan Update, the Vision was again assessed and reaffirmed through the responses of residents (see Introduction for more details on Community Input). This engagement effort provided an opportunity to ask deeper questions regarding the aspirations and concerns of residents. The findings of the two questionnaires and four workshop activities were used to prepare the updates to the Naples 2045 Comprehensive Plan. See Initiatives and Priorities below for the Vision.

INITIATIVES AND PRIORITIES

The City Council has reviewed the resulting document and determined that the following initiatives and priorities are appropriate to provide guidance to the elected officials, appointed boards and committees, and City staff in making decisions relative to capital projects, the City's annual budget, and the review of private development.



OUR PLACE - PRESERVE SMALL TOWN CHARACTER AND CULTURE

~~(~~This priority was ~~R~~rank~~k~~ted a ~~V~~ very ~~i~~Important g~~G~~oal by 80% of the ~~Survey r~~Respondents participating in the survey conducted as part of the 2020 Naples Vision Element "Our Community's Vision for the Future." During the Naples 2045 community engagement, residents were asked, "Which of these features best represents why you choose to live within the City of Naples?" and could select more than one answer. The most common response (32%) was "Naples' small town character and culture," indicating that preserving the City's distinctive identity, scale, and sense of place is central to why people choose to live in Naples.

When asked which characteristics best represent the "small town charm" of Naples, residents identified low-rise buildings (21%), quaint shopping districts (19%), defined open and green spaces (17%), and defined residential neighborhoods (16%).

We believe in maintaining and embracing the features that make Naples special: a town of residential neighborhoods, waterfronts, green spaces, boutique shopping areas, thriving arts, diverse special events, and friendly people.

SCALE OF DEVELOPMENT AND REDEVELOPMENT

- We support our pattern of predominantly low-rise buildings that are designed with open space and greenery, and that are sized to be comfortable for people and in scale with the surrounding community and mitigate impacts on our environment.
- We support the provision of resources and infrastructure to meet existing needs, and we support continued evaluation of our infrastructure's adequacy to meet future needs.
- We will maintain the features of our shopping and dining districts that provide a unique sense of place, including comfortable and safe walking environments, high architectural standards, and non-intrusive structures.

HISTORIC ASSETS

- Our City Pier, City Dock, Historic District within Old Naples, and historic buildings help convey the character of our community. We support the continued preservation, maintenance, and protection of these assets.
- We will advocate for the preservation of historic houses in the City, especially in the historic district.

SAFER STREETS AND TRAFFIC CALMING

- Our streets will be scaled to accommodate opportunities for safe and comfortable walking and bicycling and calm vehicular flow.
- We will employ traffic management strategies for our major intersections with a focus on improving mobility and safety for pedestrians, bicyclists, and vehicles.

ZONING AND BUILDING CODE ENFORCEMENT

- Our adopted plans and zoning code are blueprints for our community. We will ensure that any proposed additions or changes to the built environment adhere to our adopted plans and zoning code, and that standards for environmental responsibility are applied to construction activities.
- We will keep our plans and zoning code up to date to ensure they always reflect the values of our community and serve the interests of the residents.



OUR NATURE - ENVIRONMENTAL SENSITIVITY

~~-~~Residents ~~(R~~ranked~~t~~ this priority as a ~~V~~very ~~i~~important g~~G~~oal by 75% of ~~Survey Respondents~~respondents participating in the survey conducted as part of the 2020 Naples Vision Element "Our Community's Vision for the Future."~~.~~ During the Naples 2045 community engagement, resiliency was identified as one of the biggest challenges facing Naples in 2025 and over the next 20 years~~)~~. When asked about hazard events that concerned them the most (residents could select more than one answer), the top three responses were flooding (24% of total responses), hurricanes and tropical storms (24%), and red tide/algae bloom (19%). Residents were also asked where they most enjoy spending time in the City and could select more than one answer. Beaches and waterbodies comprised 23% of responses and green space and parks were another 13%.

We believe in the stewardship of our land and protection of our beaches, bays, river, estuaries, and lakes through education and investment that supports clean water, clean technology, and resilient coastlines.

WATER QUALITY

- Our natural environment is the cornerstone of our economy, and its preservation is an overarching priority for our community's well-being and sustainability.
- Our Gulf beach, bays, and lakes are our community's premiere assets, and we will restore and sustain their health for future generations.
- To address the threats of harmful algal blooms, we will provide for adoption, education, and enforcement of water quality standards that strictly control detrimental impacts caused by human activity such as pollution generated by fertilizers, litter, and runoff.

RECYCLING AND WATER RECLAMATION PROGRAMS

We will maintain our recycling and water reclamation programs and improve them with available knowledge, technology, and resources.

ENVIRONMENTAL ENHANCEMENT AND MONITORING

- We support evaluating plans for new vegetation based on the right tree, right place philosophy to protect and enhance the health of flora and fauna in our community.
- We support monitoring the health of our coastlines, water bodies, drinking water, urban forest, and habitats to inform the design and implementation of maintenance and enhancement programs.

STORMWATER MANAGEMENT

- New public and private stormwater management systems will be designed, and older infrastructure improved, so that retention and treatment mimic natural systems to improve water quality and mitigate the impact of water quantity on City systems.

- Strategically address mitigation efforts to improve resiliency and protect against sea level rise.

DRINKING WATER

We will continue to invest in our potable water system to ensure the supply and distribution of Naples drinking water exceeds state and local capacity and quality standards.

BEACH MAINTENANCE AND WATERBODY EROSION

We will invest in programs for responsible re-nourishment and enhancement of the Gulf coast, bay, estuarine, and lake waters.

RESILIENCY

We will work with Collier County and the State on issues pertaining to sea level rise and flood prevention to preserve the long-term investment of property owners.



OUR EXPERIENCE - EXTRAORDINARY QUALITY OF LIFE FOR RESIDENTS

~~(~~This priority was ~~R~~rank~~k~~ted as a ~~V~~ very ~~I~~important ~~G~~goal by 71% of ~~Survey R~~respondents participating in the survey conducted as part of the 2020 Naples Vision Element "Our Community's Vision for the Future."~~)~~ During the Naples 2045 community engagement, residents were asked, "Which of these features best represents why you choose to live within the City of Naples?" and could select more than one answer. The second most common response (31%) was "extraordinary quality of life," reinforcing that residents value Naples not just for a single attribute, but for the cumulative experience of living there, including lifestyle, amenities, and overall well-being.

We value keeping our community safe, clean, healthy, and balanced with opportunities for living, working, enrichment, and play.

SAFETY

We support the maintenance of police and fire services that proactively ensure the safety of every resident through diligence, helpfulness, and performance at the highest standards.

CLEANLINESS

We will continue to invest in maintaining a clean and manicured appearance of our community.

AFFORDABILITY

We seek to maintain a cost of living that allows our community to be made up of people of all generations.

COMFORT AND PEACEFULNESS

- We will continue protecting the peace and quiet of residential neighborhoods from intrusive activities and from large-scale development.
- We seek to mitigate and control effects of noise from factors such as airplanes, lawn and construction equipment, and traffic.

- We will manage conflicting interests of tourists and residents by prioritizing peace and comfort of residents.
- We will balance the impacts of special events by assessing and managing the geographic locations and levels of activity associated with events so that the comfort and convenience of residents is maintained.
- We are proud to be a Blue Zone community and support initiatives that foster healthy lifestyles.

GREENSPACE, RECREATION, AND WATER ACCESS

- We support the maintenance and creation of green spaces, parks, paths, trails, and public access to the waterfront to provide connections to nature and allow for enjoyment of the outdoors.
- Access to the beach will be maintained in a way that does not compromise the protection of this resource.

COMMUNITY FABRIC AND THE ARTS

- We support keeping the fabric of our community made up of families sharing in the warm weather, friendly people, and gentle pace of life.
- We value the visual and performing arts facilities that enrich the lives of residents.

LANDSCAPING AND SPACIOUSNESS

- Hallmarks of our community are the Gulf front ambiance and predominance of greenery. We will maintain the tradition of providing beach access, passive green spaces, natural green space, parks, and colorful landscapes throughout Naples in an environmentally sensitive way.
- We will maintain the designation of Naples as a Tree City USA, and we will continue maintaining and enhancing the health and size of our urban forest.

EMERGENCY SERVICES

- We will maintain the closest unit fire response system to ensure protective care of life and property is provided by the closest available service provider.
- We will continue to uphold and equip a Fire-Rescue Department comprised of highly qualified and trained emergency personnel.



OUR ECONOMY - ECONOMIC HEALTH AND VITALITY

(This priority was Rranked as a Vvery iImportant Ggoal by 44% of Survey Rrespondents participating in the survey conducted as part of the 2020 Naples Vision Element "Our Community's Vision for the Future."

During the Naples 2045 community engagement, residents were asked, "Which of these features best represents why you choose to live within the City of Naples?" and could select more than one answer. The third most common response (31%) was "economic health and vitality," suggesting that employment opportunities, economic stability, and a strong local economy play a meaningful role in residential choice.

We value the businesses and health care industry that enhance our small-town character as amenities that contribute to our collective success and well-being.

HEALTH CARE

We support efforts to maintain and enhance the medical business community that makes Naples a leader in health care.

BUSINESSES

- We aim to keep our economy vibrant by supporting local businesses that enhance our small-town character.
- We seek to maintain the established geographical diversification of commercial areas that are in scale with surrounding neighborhoods.
- We support maintaining the distinct character and charm that distinguish our commercial districts as premier, mixed-use environments for strolling, dining, and shopping for goods and services in scale with surrounding neighborhoods.
- We will continue balancing the interests of businesses and tourism with the needs of residents.

AIRPORT

We recognize the importance of the airport in the local economy and the convenience of the residents in the community while also acknowledging the need to curb the noise impacts for the peaceful enjoyment of our homes.



OUR GOVERNANCE - HIGH PERFORMING GOVERNMENT

This priority was ~~(R~~ra~~nk~~ted as a ~~V~~very ~~I~~important ~~G~~goal by 42% of ~~Survey R~~respondents participating in the survey conducted as part of the 2020 Naples Vision Element "Our Community's Vision for the Future." During the Naples 2045 community engagement, residents were asked to identify which City Communication methods kept them most informed. Answers revealed strong support for multiple communication platforms, with digital methods receiving the highest number of selections and traditional and in-person methods also remain important.

We support our City government to be proactive, engaging, and responsive to ensure high levels and quality of service for current and future generations of residents.

ENGAGED AND COLLABORATIVE WITH LOCAL AND REGIONAL PARTNERS

- Our government will be engaged with community and regional partners to ensure a collaborative approach to addressing matters related to our environment, quality of life, and municipal assets.
- We will have ongoing coordination and communication with adjoining jurisdictions so that potential impacts of activities proposed along City borders are identified and discussed to reduce impacts on the City.
- We will work with other local governments to preserve our home rule authority.

TRANSPARENCY

We seek to have our city officials maintain strong connections with residents through regular engagement in both formal and informal settings.

ETHICS

- Operation of our government is by the people and for the people, with ethics above all else.
- We count on our government officials and decision makers to be fiscally responsible and to consider residents at the forefront of every decision.

INFRASTRUCTURE SENSITIVE TO THE LOOK AND FEEL OF NAPLES

- Infrastructure replacements or additions will be designed and constructed with sensitivity to neighborhood ambiance and to the environment.
- We will evaluate the amount and location of vehicle parking for commercial, institutional, and mixed-use districts so that comfort and convenience of residents is maintained.
- We will continue evolving our transportation system with multimodal solutions to control congestion.
- Our government will continue to pro~~-~~actively ensure our community is prepared and equipped for natural disasters and hazards.

- We strive to facilitate undergrounding of powerlines for the future resilience and overall appearance of our community.

STRATEGIC STEPS

TOP PRIORITY INITIATIVES

The following top priority initiatives were established as a result of the 2020 Naples Vision Element "Our Community's Vision for the Future."

1. Water Quality-Clean up the lakes system and Naples Bay and keep them clean.
2. Review and amend the planning and building codes which would ensure our small-town feel and charm.
3. Facilitate the re-nourishment of our beaches and sustain them.
4. Balance redevelopment and parking issues with community character and environmental conditions Citywide.
5. Invest in improving the levels of service infrastructure for water quality, resiliency, and sea level rise mitigation.
6. Foster an economic environment where businesses may develop and thrive, and small businesses are encouraged.
7. Actively engage Collier County to address impacts of growth on the City of Naples (i.e., transportation, housing, population increases, beach access, water quality, and infrastructure).
8. Encourage the preservation of the City's historical landmarks and features.
9. Work with the Naples Airport Authority to ensure the airport's vitality while addressing issues of concern such as noise levels.
10. Continue to develop and carryout investment priorities throughout the entire Community Redevelopment Area.
11. Actively engage and defend home rule.
12. Encourage safe multi-modal and pedestrian transportation networks to improve safety for bicycles and pedestrians with a commitment to safer streets and traffic calming.

~~VISION WORK PLAN~~ *[Vision Work Plan has been incorporated throughout all Elements and replaced visually with icons to indicate how vision is being carried forward]*

~~Introduction V.W.P. 2~~

~~Goals, Objectives and Policies .....V.W.P. 2~~

~~INTRODUCTION~~

~~Naples is a premier City that offers a high quality of life exemplified by cleanliness, safety, well-maintained homes and businesses, distinctive architecture, tree-lined streets, landscaped medians, a high level of municipal services, environmental corridors, pristine beaches, and tropical climate. In addition to these assets, the mix and location of residential, commercial, institutional, and recreational land uses within a neo-traditional framework fosters the small town character and charm.~~

~~The City of Naples conducted a visioning process from January 2007 to June 2007 which culminated in "Preserving Naples: A vision plan to keep the best of the past while building a better community for the future." The Vision recognizes the City as one of the nation's premier communities with a high quality of life that the residents want to preserve. The core vision is preservation of those features that make it a distinctive and high quality place to live, work, and play. The Vision presents five goals:~~

~~The core goal:~~

~~1. Preserve the Town's distinctive character and culture The critical element goals:~~

~~2. Make Naples the green jewel of southwest Florida~~

~~3. Maintain an extraordinary quality of life for residents~~

~~4. Strengthen the economic health and vitality of the City The enabling goal:~~

~~5. Maintain and enhance governance capacity for public service and leadership~~

~~The goals and related strategies have been integrated into the City's annual budgeting process and are further described in this work plan with related policies. The Vision Work Plan mirrors the goals and strategies of the Vision. Where applicable, the policies of the Vision Work Plan include a reference to an objective or policy of the Comprehensive Plan elements that will further the policies of the Vision.~~

~~GOALS, OBJECTIVES AND POLICIES~~

~~GOAL 1:~~

~~Preserve the Town's distinctive character and culture by maintaining the small town look and feel of the City.~~

~~GOAL 2:~~

~~Pursue environmental policies and community sustainability to make Naples the green jewel of southwest Florida.~~

~~GOAL 3:~~

~~Maintain and enhance amenities in the City to sustain an extraordinary quality of life for its residents.~~

~~GOAL 4:~~

~~Strengthen the economic health and vitality of the City.~~

~~GOAL 5:~~

~~Encourage the public involvement through public service and leadership.~~

~~The following Objectives and Policies are taken from the Strategies and Actions of the Vision. The related Goals are indicated with each Objective.~~

~~Objective 1: Maintain beach re-nourishment and protection efforts.~~

~~Policy 1-1: Insure that there is consistent quality in the sand used to re- nourish beaches (CCME Policy 4-6).~~

~~Policy 1-2: Consider methods of beach cleaning and litter prevention that would protect natural features and wildlife on the beach (PRE Policy 1-19).~~

~~Objective 2: Continue planned open space, park and recreation facility and program enhancements and improvements.~~

~~Policy 2-1: Develop Pulling Park Property along the Gordon River (PRE Policy 2-1).~~

~~Policy 2-2: Continue Fleishmann Park improvements with County participation (PRE Policy 2-2).~~

~~Policy 2-3: Assess the use and benefit of the River Park pool and determine if use is adequate to support improvement or alternate recreational amenities (PRE Policy 2-3).~~

~~Policy 2-4: Continually seek to match the number and type of cultural programs and activities to match the needs and desires of the community (PRE Policy 2-4).~~

~~Policy 2-5: Develop a Crayton Cove master plan for public use of Naples Bay (CCME Policy 3-1).~~

~~Policy 2-6: Develop additional public facilities and services for children and coordinate efforts with the School District and Collier County (PRE Policy 2-6).~~

~~Policy 2-7: Through the development review process and vacant property assessment, identify and develop more green space opportunities in the 41-10 area and individual neighborhoods (PRE Policy 2-7).~~

~~Policy 2-8: Continue to pursue the annexation of Keewaydin Island to insure the preservation of this resource and to limit development and recreational impacts.~~

~~Policy 2-9: Continue to assess recreational facility use patterns to determine appropriate funding from Collier County and other sources (PRE Policy 2-9).~~

~~Objective 3: Develop a City pathway system that provides connections with schools, greenways and sidewalk interconnections.~~

~~Policy 3-1: Implement the existing pathway study (TE Policy 3-3, Objective 7, Policies 7-1, 7-3, 7-4, 7-5).~~

~~Policy 3-2: Favorably consider annexations that would provide enhancements to the pathway options for existing residents (TE Policies 7-4, 7-6).~~

~~Policy 3-3: Participate in joint projects with the County and other agencies to connect with existing and proposed pathway projects (TE Objectives 6, 8, Policy 6-1).~~

~~Objective 4: Maintain the high aesthetic standards of the community.~~

~~Policy 4-1: Maintain the landscaping in public areas including medians, parks and streetscapes. (PRE Policy 1-2).~~

~~Policy 4-2: Develop a signage program for the City (FLUE Policy 1-2.1 & 1-9).~~

~~Policy 4-3: Implement higher design standards for signage on private property (FLUE Policy 1-2.1).~~

~~Policy 4-4: Increase enforcement and upgrade codes for landscaping on private commercial properties (FLUE Policy 1-4.2 & 1-5.6).~~

~~Policy 4-5: Schedule regular maintenance and debris removal of streets.~~

~~Policy 4-6: Incentivize property improvements on commercial properties (FLUE Policy 1-6.5).~~

~~Policy 4-7: Maintain a post disaster clean-up plan.~~

~~Policy 4-8: Work with FP&L to pursue the burying of power lines and assist neighborhoods in achieving this goal where possible. (FLUE Policy 1-6.5).~~

~~Objective 5: Develop strategies to protect historic resources while not inhibiting private property rights.~~

~~Policy 5-1: Review and revise the City's list of contributing structures (FLUE Policy 6-7).~~

~~Policy 5-2: Incentivize remodeling and renovation by amending the criteria and standards for variances and the expansion of non- conformities and inform property owners of existing incentives (FLUE Policy 6-10).~~

~~Policy 5-3: Provide educational materials on Naples' history and the benefits of historic preservation (FLUE Policy 6-13).~~

~~Objective 6: Adopt and implement an annexation policy that will enhance and preserve the character and culture of the City.~~

~~Policy 6-1: Consider annexations on a case by case basis but do not aggressively pursue annexations (Generalized Future Land Use Section 5).~~

~~Policy 6-2: Adopt and implement criteria and standards for annexation to determine the strategic benefits such as:~~

- Impact on the small town character;
- Impact on the level or quality of existing services to residents;
- Increase in the City's ability to influence or control development that would impact Naples;
- Consistency of the area under consideration with the character of Naples;
- Impact on existing City residents' access to City officials;
- Impact on the voting power of existing City residents;
- Transportation impacts;
- Use of City services by residents of area being considered for annexation;
- Presence within the City's utility service area; and
- Financial benefits and costs.

Policy 6-3: Consider a referendum of existing City residents on the annexation of areas that may have significant impacts on the City.

Objective 7: Develop transportation options while increasing control over existing transportation routes.

Policy 7-1: Complete a motorized and non-motorized traffic study and implementation plan to optimize circulation (TE Objective 2).

Policy 7-2: Examine feasibility of re-routing traffic off U.S. 41 to encourage more destination oriented traffic to the local businesses and through traffic to other arterials. (TE Policies 1-4, 1-6, 1-12, 1-13).

Policy 7-3: Use traffic calming and routing to reduce through traffic and commercial vehicles in residential areas (TE Policy 1-9, Objective 2, Policy 2-1).

Policy 7-4: Assess impacts of the Golden Gate overpass and develop strategies to reduce or address impacts (TE Policies 1-10, 1- 11).

Objective 8: Develop commercial parking options to reduce parking impacts in adjacent residential neighborhoods while supporting commercial businesses.

Policy 8-1: Identify locations and funding for parking and consider partnerships for mixed use parking garages in the high intensity commercial and mixed use districts of the City (FLUE 1-14).

~~Policy 8-2: Calculate parking needs at build-out in the redevelopment area and amend parking requirements and payment in lieu of programs accordingly (FLUE 1-14).~~

~~Objective 9: Provide recreational experiences that are enjoyable, safe and of a high quality.~~

~~Policy 9-1: Address boat speeds in cooperation with other regulating agencies (PRE Policy 3-1).~~

~~Policy 9-2: Work collaboratively with Collier County to address beach access issues (PRE Policy 3-2).~~

~~Policy 9-3: Maintain the quality of the parks and recreational programs (PRE Policy 3-3).~~

~~Policy 9-4: Ensure County pays fair share of beach access costs (PRE Policy 2-9).~~

~~Objective 10: Enhance the quality of the residential experience of Naples to promote the safety, ambiance, beauty and quietness of life.~~

~~Policy 10-1: Develop parking options as outlined in Objective 8.~~

~~Policy 10-2: Continue to pursue ordinances that relieve "mega-house" impacts while protecting property rights (FLUE Policy 1-4.1).~~

~~Policy 10-3: Improve enforcement of the noise ordinance relative to commercial establishments adjacent to residential uses.~~

~~Policy 10-4: Work with Airport to address noise in the flight path (Objective 7).~~

~~Policy 10-5: Establish working groups with representation from residential and commercial interests to address noise impact issues.~~

~~Objective 11: Maintain the diverse cultural, socio-economic, economic and lifestyle aspects of small town life.~~

~~Policy 11-1: Develop and execute a State lobbying strategy, consistent with City revenue and budgeting needs, in collaboration with Collier county and other appropriate stakeholders to address affordability issues of taxes, insurance and associated public policy concerns.~~

~~Policy 11-2: Promote diversity in housing choices consistent with the character of Naples (HE Policy 2-4).~~

~~Policy 11-3: Review City redevelopment strategies in the 41-10 district and promote incentives for mixed use and disincentives for "big box" retailers.~~

~~Policy 11-4: Incentivize businesses that serve local residents through flexible parking requirements (FLUE Policy 1-7.6).~~

~~Objective 12: Support the regional development of workforce housing.~~

~~Policy 12-1: Incentivize workforce housing in the downtown redevelopment area and other areas of the City (HE Policy 2-3, 2-4, 2-5).~~

~~Policy 12-2: Preserve the existing affordable rental housing and homeownership (HE Policy 3-3).~~

~~Policy 12-3: Participate in regional workforce housing efforts (HE Policy 2- 2).~~

~~Objective 13: Support "community character consistent" redevelopment that adds amenities for existing residents.~~

~~Policy 13-1: Provide flexibility in zoning that will promote development that is consistent in scale and design with existing development and will promote voluntary historic preservation (FLUE Policy 6-9).~~

~~Policy 13-2: Implement the recommendations of the Trent Green report for Fifth Avenue South and U.S. 41 East through the establishment of an overlay district and the treatment of the four corners intersection (FLUE Policy 1-13).~~

~~Policy 13-3: Implement the recommendations of the Andres Duany report on Fifth Avenue South by addressing traffic, a west end parking garage, improved pedestrian access and the redevelopment of Park Street (FLUE Policy 1-14).~~

~~Policy 13-4: Amend the land development code as necessary to promote redevelopment strategies.~~

~~Objective 14: Maintain the viability of commercial areas of the City that provide services of value to residents.~~

~~Policy 14-1: Foster public understanding of the importance of downtown in the regional market and the economic impact on the City.~~

~~Policy 14-2: Broaden the development and marketing vision for downtown to include not only a venue for tourists and people from outside the city but as place residents will use and enjoy.~~

~~Objective 15: Adopt and promote one of the Healthy America programs to encourage residents to engage in healthier lifestyles.~~

~~Policy 15-1: Review existing programs designed for community health such as Healthy America 2010 or the National Governor's Association Healthy America program.~~

~~Policy 15-2: Form a partnership with the School Board, Hospital and other major employers to develop and promote a healthy lifestyle program.~~

~~Policy 15-3: In concert with pathway strategy, develop a more walkable and bikeable City (TE Objective 7, Policies 7-1, 7-2, 7-3, 7-4, 7-5, 7-6).~~

~~Policy 15-4: Develop City facilities to encourage physical activity.~~

~~Objective 16: Continue and strengthen the City's leadership role in environmental protection and regional/community sustainability.~~

~~Policy 16-1: Actively participate in regional water and environmental forums (CCME Policies 2-1, 2-4, 2-9, 4-4, 14-8, 15-1 - 15-6).~~

~~Policy 16-2: Update water supply plans and maintain and improve capital improvements for responsible water management (Water Supply Facilities Work Plan).~~

~~Policy 16-3: Adopt Florida Green Building standards.~~

~~Policy 16-4: Expand water reuse system and capacity.~~

~~Policy 16-5: Work collaboratively with other public agencies on solutions to red tide (CCME Policy 15-2, 15-4).~~

~~Policy 16-6: Continue efforts in the Naples Bay Watershed Initiative and the Surface Water Improvement and Management Plan (CCME Policy 15-3).~~

~~Policy 16-7: Partner with Collier County to establish a system of natural filter marshes to capture storm water runoff around Naples Bay (CCME Policy 15-3).~~

~~Policy 16-8: Support efforts by the Big Cypress Basin (South Florida Water Management District) to divert large amounts of water currently entering Naples Bay form the Golden Gate Canal to the south and out of the Naples Bay watershed (CCME Policy 15-3).~~

~~Policy 16-9: Adopt the U.S. Conference of Mayor's Climate Agreement.~~

~~Policy 16-10: Participate in Florida and National League of Cities and U.S. Conference of Mayors forums on environmental issues.~~

~~Policy 16-11: Review approaches and best practices of other cities regarding alternative fuel city vehicles, water conservation, energy conservation and new waste to energy technologies (CCME Policy 1-9).~~

~~Policy 16-12: Enhance the storm water management system to include increases in the storm water fee to fully fund a storm water capital improvements initiative that will benefit Naples Bay and other water bodies and generally benefit storm water management throughout the City.~~

~~Policy 16-13: Work with Florida Power and Light on energy conservation methods the City as an entity and local businesses and residents could institute as well as begin discussions on net metering for residents or businesses that decide to invest in solar energy.~~

~~Objective 17: Maintain a safe community.~~

~~Policy 17-1: Maintain adequate public safety staffing and response times.~~

~~Policy 17-2: Ensure proper credentials, accreditation and certifications are obtained and maintained for public safety staff.~~

~~Policy 17-3: Maintain public safety infrastructures including equipment and public works capacities.~~

~~Policy 17-4: Establish and maintain ongoing relationships with the community as to their desires, concerns and expectations.~~

~~Policy 17-5: Maintain public safety plans, in particular disaster response plans.~~

~~Objective 18: Maintain and enhance governance capacity for public service and leadership to maximize the extensive expertise of Naples residents.~~

~~Policy 18-1: Ensure proper credentials, accreditation and certifications are obtained and maintained for all City staff.~~

~~Policy 18-2: Insure that level of service demands for new development and redevelopment are maintained.~~

~~Policy 18-3: Involve citizens in the implementation of the Vision and Comprehensive Plan.~~

~~Policy 18-4: Increase City staff and citizen participation in regional governance forums.~~

~~Policy 18-5: Attract and retain qualified City personnel through competitive salary and benefits and an excellent workplace.~~

~~Policy 18-6: Continue adherence to best management practices.~~

~~Policy 18-7: Conduct cost/benefit analysis on major capital expenditures.~~

~~Policy 18-8: Encourage a regional perspective on solutions to local problems.~~

~~Policy 18-9: Maintain Blue Ribbon Service policies.~~

~~Policy 18-10: Continue adequate planning and funding of capital maintenance.~~

~~Objective 19: Broaden and enrich citizenship for City residents by increasing citizen involvement and engagement with City government.~~

~~Policy 19-1: Conduct annual satisfaction survey.~~

~~Policy 19-2: Hold informal open public forums with boards for citizen input.~~

~~Policy 19-3: Conduct periodic web or newspaper based straw polls on topical issues.~~

~~Policy 19-4: Continue to secure resident participation on committees, boards and regional forums.~~

~~Policy 19-5: Develop time-limited and role-specific projects related to the Vision and seek citizens with specific skills to participate in those projects.~~

~~Policy 19-6: Offer citizen academies and educational programs on a regular basis.~~

~~Policy 19-7: Formalize a schedule for City Council members to speak at neighborhood and condominium association meetings.~~



3

FUTURE LAND USE ELEMENT

In this Section:

Introduction

Goal, Objectives, Policies, and Actions

Future Land Use

INTRODUCTION

Required per Florida Statutes Section 163.3177(6)(a), ~~T~~the principal purpose of the Future Land Use Element is to establish the physical framework, design character, and appearance of the City. Specifically, it establishes the classification, spatial distribution, relationship, balance, character, and intensity/density of land uses that are supported by the residents of Naples.

The Future Land Use Element provides three (3) principal implementation mechanisms as follows:

1. The Future Land Use Map;
2. The goal~~s~~, objectives, ~~and~~ policies, and actions; and
3. The land use and character designation ~~description~~ section.

Each of these mechanisms serves a separate function but is directly related to and operates in conjunction with the other two (2) mechanisms. In addition, each mechanism is consistent with and furthers the City's vision and the other elements in the Comprehensive Plan. The following provides a description of each mechanism.

The Future Land Use Map establishes the "physical form" of the City and physical relationship of land uses. This is accomplished through the establishment of the various land use categories and by the geographic distribution, location, and extent of each land use category as delineated on the Future Land Use Map.

Existing land use is how land is being used right now; in comparison, future land use outlines the intended or planned uses of that land based on a community's long-term vision established in the comprehensive plan. In planning, the gap between the two helps identify where redevelopment or preservation efforts may be focused.

While the Future Land Use Element provides policy guidance for the appropriate and desired development patterns and natural areas throughout the City, the Naples Land Development Code (LDC) is the legal tool that regulates the use of land, including the types of structures that are permitted in different zoning districts, how they are built, where they can be located on a property, how they are designed, and how they may be used. There may be more than one appropriate zoning district category for each Future Land Use category.

The goal~~s~~, objectives, ~~and~~ policies, and actions serve three (3) functions as follows:

1. To outline the City's development concepts, including desired project appearance, design character, and attributes.
2. To establish site specific guidelines for development, redevelopment, and reuse.
3. To provide direction on City-wide growth management planning issues.

The land use designation ~~description~~ section outlines the character, intent, function, standards, and ~~permitted~~ allowed activities for each land use category. This section also describes the relationship between the various land use categories.

~~The future "physical form" is not expected to vary significantly from existing patterns of development. Past land use plans and accompanying zoning ordinances have produced a generally desirable development pattern. However, opportunity for redevelopment and infill development exists. Thus, this element gives special consideration to redevelopment and reuse of existing structures and property.~~[1]

~~Since~~ As the physical form of the City is fairly well established, the Future Land Use Element proposes a special focus on maintaining community and neighborhood character and small town charm through redevelopment and adaptive reuse. ~~t~~The crux of the Future Land Use Element is the goal~~s~~, objectives, ~~and~~ policies, and actions, ~~. The goals, objectives and policies establish~~which establish a comprehensive approach to ~~focus on~~ attain~~ing~~ a desirable, resilient built environment while protecting and enhancing the established residential areas and the community's natural resources. The Future Land Use Designations complement the goal~~s~~, objectives, policies, and actions to support the desirable resilient built environment envisioned by residents.

Naples is recognized as an established yet continually renewing coastal community. The Plan should protect the distinct character and quality of life of its residential neighborhoods while encouraging thoughtful redevelopment, reinvestment, and architectural evolution. Land-use policies should respect private property rights, promote compatibility among neighboring uses, strengthen environmental stewardship and coastal resiliency, and support the modernization of aging infrastructure. The Plan should provide a clear, balanced, and predictable framework that allows Naples to evolve responsibly while preserving the qualities that make it an exceptional place to live.

The goal~~s~~, objectives, ~~and~~ policies, and actions are designed to provide guidance for future growth and redevelopment as follows:

1. Maintain and improve ~~the~~ neighborhood character and high quality of residential life.
2. Ensure that the use of City resources does not exceed the carrying capacity (the maximum number of users that can be sustained by a given set of facilities), in coordination with the Levels of Service (LOS) in the Concurrency and Capital Improvement Element.
3. Strengthen City and County cooperative planning ~~programs~~and coordination.
4. Protect and enrich the environment, including natural elements like trees, landscaping, green infrastructure, and open space that support community character and resiliency.
5. Establish a long-term plan for the downtown, Gordon riverfront, Miracle Mile, and Naples bayfront development/redevelopment.
6. Increase public recreational opportunities, parks~~,~~.[2] and open space to support quality of life and increase flood storage.
7. Coordinate and maintain resilient infrastructure design that supports community character.
8. Increase the City's resiliency to hazards to improve response and recovery and plan for the impacts of future environmental conditions.
9. Reduce impacts of adjacent development on established neighborhoods.

[1] Removed based on 2018-2021 PAB Recommendations

[2] 2018-2021 PAB Recommendations

~~7.~~10. Establish a traffic management system that ~~facilitates accessibility and movement while protecting~~protects residential quality, pedestrian safety, and accessibility.[3]

~~8.~~11. Strengthen and diversify the economic base of the City. Improve the appearance and urban design of commercial corridors while protecting the residential character and charm of the City.

~~9.~~12. Enhance the appearance of streets within the City.

~~10.~~13. Ensure that the Airport is operated in the best interests of the residents of the City.[4]

~~11.~~14. Maintain an annexation policy that carefully considers the benefits and impacts of each annexation.

15. Preserve the City's historic assets, landmarks, open space, and other cultural resources. (See also Housing Element Objective H-5.)

16. Align future land use to enhance, develop, and create workforce housing opportunities.[5] (See also Housing Element Objectives H-1 and H-2.)

The Future Land Use Element, with its focus on policies for ~~future growth~~balanced growth, upholding community character, and environmentally responsible development and redevelopment, sets the framework for the other elements in the P~~p~~lan. For example, the Future Land Use Element accommodates needed housing, recreation areas, and transportation rights-of-way. At the same time, other P~~p~~lan elements, such as the Conservation and Coastal Management Element, provide specific goals, requirements, and/or constraints on areas with significant natural resources that will affect the Future Land Use Element. A new Resiliency Element includes policies to support decision-making on changing environmental conditions, predominantly increasing flood risk. The elements are intended to complement each other and support the City's vision and its goals, objectives, and policies. Maps associated with this Comprehensive Plan include Future Land Use ~~; Existing Land Use; Natural Resources; Parks, Recreation and Open Space; Traffic Circulation;~~ and Coastal Resources and are located at the end of the Plan. ~~The Existing Land Use Map shows the generalized land uses adjacent to the boundaries of the City.~~ There is no agricultural land within the City.

The Community Profile, which provides an overview of existing conditions and relevant data, is available in the Introduction of this Plan. ~~The projected future "physical form" of Naples is based, in part, on the data and analysis contained in the support document of the Comprehensive Plan.~~ The Future Land Use Element is based on current and projected population, demographic, housing and future land use data and analysis, which are also found in ~~this~~the Introduction. ~~. These projections are also found in the support document.~~

[3] 2018-2021 PAB Recommendations

[4] 2018-2021 PAB Recommendations

[5] 2018-2021 PAB Recommendations

The following sections contain the goal~~s~~, objectives, ~~and~~ policies, and actions and the description of the generalized future land uses. The Future Land Use Map is contained in the map series located in the ~~end of this document~~Appendix.

GOAL~~S~~, OBJECTIVES, ~~AND~~ POLICIES, AND ACTIONS

The goal, objectives, ~~and~~ policies, and actions are separated into two (2) categories - City ~~development~~ Development ~~guidelines~~ Guidelines and ~~growth management~~Future Land Use.

The City's D~~d~~evelopment G~~g~~uidelines establish the general ~~framework~~ direction for City-wide comprehensive planning issues. ~~the location, distribution, and intensity/density of land uses.~~ They also outline general development, character, and land use concepts and provide site design guidelines for new development, redevelopment, and reuse.

~~The growth management category provides general direction for City-wide comprehensive planning issues.~~ Future Land Use is set out in the two subsequent sections: Generalized Future Land Use and Future Land Use Designations. These provide the intended location, distribution, intensity/density, and character of land uses.

All ~~of~~ the objectives, ~~and~~ policies, and actions work in unison to further the City's planning efforts and assist in land use decision making.

GOAL

Provide for the best distribution, interrelationship, and balance of land uses ~~in order to~~to produce a safe, healthy, convenient, and attractive environment within which the residents of Naples can live, work, and recreate. ~~Applications for new development, redevelopment, and reuse shall be evaluated in accordance with the following objective and policies.~~[6] ~~Applications~~ Land development or redevelopment applications that are not in compliance with one or more of the policies shall be found to be inconsistent with the ~~Future Land Use Element~~Comprehensive Plan ~~unless otherwise provided for by a special overlay district or located within the Community Redevelopment Area.~~[7] The following policies reflect design guidelines consistent with the goal of this element.

[6] 2018-2021 PAB Recommendations.

[7] 2018-2021 PAB Recommendations.

CITY DEVELOPMENT GUIDELINES ~~(OBJECTIVE 1 AND ENSUING POLICIES)~~



Objective FLU-1 Support Balanced, Well-Designed, and Resilient Development

Manage new development, redevelopment, and reuse to ensure that it is orderly, balanced, resilient, and compatible with the City's desire to maintain its goals around the **built environment** (~~and~~ protect ~~its~~ existing residential and community character and~~, to~~ maintain the viability of ~~its~~ commercial areas), **natural environment** (~~,~~ provide open space and ~~/~~green space ~~,~~ and protect environmentally sensitive lands), and **quality of life and social connections** (encourage pedestrian/bicycle linkages) ~~, and protect environmentally sensitive lands~~

Manage new development, redevelopment, and reuse to support orderly, balanced, and resilient growth; encourage thoughtful renewal and private reinvestment; respect private property rights; and promote reasonable compatibility with surrounding neighborhoods and infrastructure capacity.

Policy FLU-1.1 ~~Permitted~~Maximum Intensity/Density of Land Use Designations

The ~~permitted~~ maximum intensity/density in each land use designation is as follows:

Land Use Category	Intensity/Density
Beach Front Estates	1 dwelling unit per 1.5 acres
Low Density Residential	0-6 dwelling units per acre
Medium Density Residential	0-12 dwelling units per acre
High Density Residential Low Rise - Coquina Sands	0-15 dwelling units per acre
High Density Residential Low Rise - Moorings	0-15 dwelling units per acre
High Density Residential Mid Rise	15-18 dwelling units per acre
High Density Residential High Rise	0-18 dwelling units per acre
High Density Residential Tower	0-25 units per acre and further limited by applicable PD/ Developer's Agreement
Mobile Home Residential	Total units capped at 141 mobile homes and 31 recreational vehicle spaces per approved Planned Development (Ordinance 92-6778 dated 10/21/92)
Senior Living Residential	18 units per acre for independent living, assisted living or skilled nursing units plus one accessory assisted living unit or skilled nursing unit for every four independent living units.
Limited Commercial	50% building coverage
Highway Commercial	30% building coverage
Airport Commercial	40% building coverage
Business Park Commercial	60% building coverage

Downtown Mixed Use	Residential Density for area within 5th Ave S, 8th Street, 7th Ave N, and Goodlette Rd is limited to 12 units/ac overall with open space provisions. Residential Density for areas in the Downtown Mixed Use Land Use, outside of the above described boundary and

	further limited as being with the area south of 4th Avenue South, north of 6th Avenue South, east of 3rd Street South and West of 9th Street South, density and intensity shall be limited according to the parking requirements and by a height limitation of three stories and 42 feet and a floor area ratio of 3. Total number of dwelling units in this area shall not exceed 1000. Parking requirements are as follows: Commercial uses - 3 parking spaces per 1000 square feet (gross) of building area Dwelling units developed as strictly residential - 2 parking spaces per unit Transient lodging units - 1 parking space per unit Residential Density for areas in the Downtown Mixed Use Land Use, outside of the above described boundaries shall be limited according to the zoning regulations but not to exceed 12 units per acre.
Waterfront Mixed Use	Marinas or marine research, development and testing 50%; other 40% building coverage
Public, Semi-Public and Private Recreation	N/A
Public, Semi-Public Institutional	45% building coverage
Conservation	1 unit per 5 net acres (as determined through the DSEI)

Policy FLU-1.2 ~~Permitted~~Allowed Uses of Land Use Designations

Unless otherwise ~~permitted~~ identified in the Comprehensive Plan, new development, redevelopment and reuse shall be consistent with the ~~permitted~~ allowed use ~~and density/intensity~~ of each designation as listed in Policy FLU-1.1 and each associated Future Land Use category (found later in the Future Land Use Designations section that follows).

Policy FLU-1.~~2.1~~3 Design of ~~Multi-Family~~ and Non-Residential Projects

~~Encourage~~ Ensure through a review process that professional standards of architectural and urban design, site planning, and landscaping are applied for all new projects. This review process will be conducted by the Design Review Board and guided by the Design Review Board Handbook as amended.

~~**Policy 1-3** Preserve and protect stable residential neighborhoods through development practices that promote compatibility and consistent character~~. ***[Moved to Policy FLU-6.2]***

Policy FLU-1.4 Non-Residential Development

Non-residential development shall be ~~compact~~ concentrated and in a readily accessible location for the market it is intended to service and shall not encroach into ~~stable~~ established residential areas.

Policy FLU-1.~~4.5~~5 Landscaping and Buffering

Landscaping and buffering shall be provided where commercial uses adjoin residential neighborhoods to avoid a negative impact on the residential neighborhood.[8]

~~**Policy 1.6** Increase the amount of green space in the City through appropriate project design and attributes.~~ ***[Moved to Policy FLU-4.2]***

~~**Policy 1.7** Xeriscaping shall be incorporated to the greatest extent possible into landscape plans for new development and replacement landscaping as a part of redevelopment and reuse projects.~~ ***[Moved to Policy FLU-4.1]***

Policy FLU-1.~~8~~6 Adequate Public Facilities in Development Approval Process

The provision of adequate public facilities (as defined by ~~Policy 1.1 of~~ the Concurrency and Capital Improvement Element) shall be discussed and negotiated with the developer during the development approval process. The City shall evaluate cumulative impacts of proposed development on drainage, transportation, utilities, public safety, and other public facilities, and identify necessary improvements and funding responsibilities before approvals, consistent with applicable law.

Policy FLU-1.~~8.1~~7 Infrastructure to Serve New Development

Require that water and sewer construction and extensions, and street rights-of-way dedication and improvements, or related construction, for new development be the financial obligation of the developer when new or improved facilities are needed as a result of the new development.

~~**Policy 1-8.2** Public facilities may be used as a transitional land use provided they do not create an incompatible situation themselves.~~[9]

~~**Policy 1-8.3** Require new, DRI scale developments to the east of U.S. 41 to provide shelters for hurricane protection~~. ***[Replaced with Policy FLU-3.2]***

[8] Original plan does not include a Policy 1.5.

[9] Removed based on 2018-2021 PAB Recommendations

Policy FLU-1.~~8.4~~8 Stormwater Management

Enforce existing development standards for stormwater management as defined in ~~Policy 1-10 of~~ the Public Facilities and Water Resources Element. Evaluate runoff and downstream effects at the neighborhood and watershed scale, including existing drainage deficiencies, and coordinate stormwater improvements with the capital improvement program.

Policy FLU-1.~~8.5~~9 Water Reuse Systems

New non-residential development, redevelopment, and reuse shall be evaluated for the potential to connect to available reuse water systems.

~~**Policy 1-8.6** Commercial and Multifamily development shall provide sidewalks per standards in the Code of Ordinances.~~[10]

Policy FLU-1.~~9~~10 Commercial Development

Commercial properties shall be ~~properly~~ appropriately[11] screened, provide adequate parking, include orderly traffic circulation patterns, and integrate appropriate design features to enhance safety, efficiency, and site appearance.

Policy FLU-1.~~9.1~~11 Parking Lots for Contiguous Developments

Parking lots for ~~separate~~ contiguous[12] developments shall be connected, ~~when~~ where appropriate~~possible~~.

Policy FLU-1.~~9.2~~12 Parking within Same Development

Parking areas within a single development shall be interconnected unless it can be demonstrated that on-site traffic and pedestrian circulation will properly function and traffic movement on adjacent public streets will not be impacted.

Policy FLU-1.~~9.3~~13 Adequate Parking

Sites shall provide adequate parking. The Code of Ordinances shall provide standards which address construction standards, location, design, configuration, dimension, and number of parking spaces. The reduction in parking for new construction shall not result in a reduction of open space or an increase in lot coverage.[13] ~~shall result in a commensurate increase in green/open space.~~

Policy FLU-1.~~9.4~~14 Ingress and Egress Configuration

Redevelopment and reuse sites shall be appropriately configured as to number, location, and design features of the ingress and egress points.

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[10] Removed as not necessary to restate individual Code of Ordinance provisions in plan.

[11] 2018-2021 PAB Recommendations

[12] 2018-2021 PAB Recommendations.

[13] 2018-2021 PAB Recommendations.

Policy FLU-1.~~9.5~~15 Pedestrian Access

Site design shall ensure safe pedestrian access from parking areas to commercial activities. Pedestrian conflicts within vehicular circulation shall be minimized.

Policy FLU-1.16 Crime Prevention Through Environmental Design

Require Crime Prevention Through Environmental Design (CPTED) review for commercial development.

Policy FLU-1.~~10~~17 Multimodal Connections

New development, redevelopment, and reuse shall be evaluated to identify potential linkages to existing pedestrian walkways and bikeways.[14] If the linkage is appropriate, physical improvements meeting City specifications shall be provided by the property owner. (See also Policy T-1.3 in the Transportation Element.)

Policy FLU-1.~~11~~18 Signage

Signage shall be compatible with the surrounding uses and character of the City and be designed and located so as not to interfere with safety or visibility.

~~**Policy 1.12**~~

~~To protect, preserve and enhance areas having significant ecological, hydrological, physical or socioeconomic importance to the public, new development or redevelopment located in areas of environmental sensitivity shall be consistent with the provisions of the Conservation and Coastal Management Element. The Code of Ordinances shall include development standards based on habitat types, suitability, storm protection, clearing, and submittal of a Development of Significant Environmental Impact Assessment. Preserving the integrity of those areas enhances the aesthetics and quality of life for city residents and visitors, provides a degree of natural protection against storms, helps maintain air and water quality, promotes fish and wildlife and habitat diversification and productivity, and promotes soil stabilization.~~ ***[Moved to Policy FLU-4.5]***

~~**Policy 1-12.1**~~

~~Review development requests for impacts on natural resources, which are identified on the Natural Resources and Coastal Resources Map. Proposed development must be consistent with goals, objectives, and policies of the Conservation and Coastal Management Element, including impacts on soils and natural topography.~~ ***[Moved to Policy FLU-4.6]***

[14] 2018-2021 PAB Recommendations.

Policy FLU-1.~~13~~19 Improve Air Quality, Reduce Energy Costs, Reduce Waste, and Conserve Water Resources

To improve air quality and reduce energy costs, ~~I~~identify and implement strategies to reduce ~~greenhouse gas emissions~~ air pollution, conserve water, and reduce waste. (See also Objective T-9 and related policies and actions in the Transportation Element.)

~~**Policy 1.13.1** Continue to promote and maintain mixed use land use and zoning that reduces trip lengths, number of trips, time of travel and promotes pedestrian activity.~~ ***[Moved to Policy FLU-1.20]***

~~**Policy 1.13.2** Maintain the existing street grid system so as to continue to disburse travel trips, provide alternative routes, maintain and/or decrease the time of travel and to reduce the carbon 'footprint' of transportation impacts within the City.~~ ***[Moved to Policy FLU-1.21]***

~~**Policy 1.13.3** Promote intermodal facilities to provide both travel options and more efficient travel by insuring that transit stops and pedestrian connections are addressed in the development review process.~~ ***[Moved to Policy FLU-1.22]***

~~**Policy 1.13.4** Promote public use of intermodal facilities through the use of public meetings, use of the City's website and direct support of service providers.~~ ***[Moved to Action FLU-1.22.1]***

~~**Policy 1.13.5** Support walkable community initiatives by insuring that on-site and off-site pedestrian connections are addressed in the development review process.~~ ***[Moved to Policy FLU-1.23]***

~~**Policy 1.13.6** Maintain a street tree program for traffic calming, reduced greenhouse gases and a more pleasant pedestrian environment.~~ ***[Moved to Policy FLU-1.24]***

> ~~**Policy 1.13.7**~~ **Action FLU-1.19.1** Amend the land development regulations as necessary to accommodate new energy producing technology such as roof mounted solar panels, floating solar facilities (floatovoltaics), as defined in F.S. Sec. 163.3205~~(2)~~ as amended, and wind turbines.

> ~~**Policy 1.13.8**~~ **Action FLU-1.19.2** Coordinate with local utilities to provide for the location and expansion of facilities that promote energy efficiency.

> ~~**Policy 1.13.9**~~ **Action FLU-1.19.3** ~~Provide an expedited review process~~Consider incentives for Florida Green Building Coalition or Leadership in Energy and Environmental Design[15] ~~for~~ (LEED) certified plans.

[15] 2018-2021 PAB Recommendations.

> **Action FLU-1.19.4** Explore methods to optimize municipal waste operations, such as improving recycling programs and decreasing solid waste generation.

> **Action FLU-1.19.5** In coordination with the Resiliency Element, explore options to improve smart water use, such as sustainably managing urban water supplies and improving urban water infrastructure. (See also Resiliency Element Policy R-2.9.)

Policy FLU-1.~~13.1~~20 Promote Mixed Use Development

Continue to promote and maintain mixed use land use and -zoning that reduces trip lengths, number of trips, time of travel and promotes pedestrian and bicycle activity while supporting adjacent neighborhood character. ***[Moved from FLUE Policy 1-13.1]***

Policy FLU-1.~~13.2~~21 Street Grid System

Maintain the existing street grid system so as to continue to disburse travel trips, provide alternative routes, maintain and/or decrease the time of travel and to reduce ~~the carbon 'footprint' of~~ impacts on air pollution from transportation ~~impacts~~ within the City. ***[Moved from FLUE Policy 1.13.2]***

Policy FLU-1.~~13.3~~22 Intermodal Facilities

Promote intermodal facilities to provide both travel options and more efficient travel by ~~insuring~~ensuring that transit stops and pedestrian connections are addressed in the development review process. ***[Moved from FLUE Policy 1-13.3]***

> ~~Policy 1-13.4~~ **Action FLU-1.22.1** Promote public use of intermodal facilities and active transportation through ~~the use of public meetings~~public education and outreach campaigns, leveraging ~~, use of~~ the City's website, public meetings, and direct support of service providers. ***[Moved from FLUE Policy 1-13.4]***

Policy FLU-1.~~13.5~~23 Pedestrian Connections

Support walkable community initiatives by e~~i~~nsuring that on-site and off-site pedestrian connections are addressed in the development review process. [***Moved from FLUE Policy 1-13.5]***

Policy FLU-1.~~13.6~~24 Street Tree Program

Maintain a street tree program ~~for~~ to support traffic calming, reduced ~~greenhouse gases~~ air pollution, reduced heat island effect, and a more pleasant pedestrian environment. [***Moved from FLUE Policy 1-13.6]***

Policy FLU-1.25 Green Public Spaces

Encourage the creation of greener public spaces like pocket parks, greenways, community gardens, and green roofs that include green installations such as planters, vertical gardens, and trees as applicable.





Objective FLU-2 Provision of Public Facilities and Services

Provide necessary public facilities, services, and utilities for existing development based on level of service standards, and plan for the provision of land for necessary public facilities for new development. Designate the financial resources needed in the Five-Year Capital Improvements Program. Public facilities shall be provided in a manner to discourage urban sprawl in accordance with Florida Statute 163.3177, recognizing that urban sprawl has limited potential due to the built-out nature of the City of Naples.

Policy FLU-2.1 Public Facilities Management

Discourage haphazard, uncontrolled, incompatible, and unserviceable growth and urban sprawl by assuring that resilient public facilities and services are in place at the time building permits are issued consistent with ~~Policies 2-1, 2-2 and 2-3~~the policies of the Concurrency ~~Management System~~and Capital Improvement Element.

> ~~**Policy 2-4**~~ **Action FLU-2.1.1** Prepare an annual level of service report ~~per~~ as required by the City's Concurrency Management Program and Monitoring Requirements. ***[Moved from FLUE Policy 2-4]***

> ~~**Policy 2-5**~~ **Action FLU-2.1.2** Coordinate the level of service report and annual update of the Concurrency and Capital Improvements Element with the Five-Year Capital Improvements Program ~~as applicable to correct deficiencies~~. ***[Moved from FLUE Policy 2-5]***

Policy FLU-2.2 Adequate Public Facilities and Access

Permit new development only in areas where adequate public facilities ~~(as defined by level of service standards)~~, and access exists or will be provided prior to occupancy.

Policy FLU-2.3 Impacts on Public Facilities

Review all site and building plans for impacts on public facilities and require all new development to maintain or contribute to established level of service standards.

~~**Policy 2.4** Prepare an annual level of service report per the City's Concurrency Management Program and Monitoring Requirements.~~ ***[Moved to Action FLU-2.1.1]***

~~**Policy 2.5** Coordinate the level of service report and annual update of the Capital Improvements Element with the Five-Year Capital Improvements Program as applicable to correct deficiencies~~. ***[Moved to Action FLU-2.1.2]***



Objective FLU-3 Comprehensive Land Use Planning and Resilience Coordination

Land uses and population densities shall be coordinated with the City's and Collier County's hurricane evacuation policies and with other relevant plans and policies related to hazard planning and resiliency.

Policy FLU-3.~~2~~1 Regional Planning for Hurricane Evacuation

Where applicable, implement regional plans as part of the City's hurricane evacuation plans.

> ~~**Policy 3.1**~~**Action FLU-3.1.1** On an annual basis, review the City's evacuation plans for consistency with the County's and Regional Planning Council's evacuation plans and policies. The City's policies and plans shall be revised as applicable.

Policy FLU-3.2 Emergency Preparedness for New Development

Applicants for new residential or mixed use development shall work with City of Naples Emergency Management staff to develop an Emergency Preparedness Plan to include provisions for storm shelter space, a plan for emergency evacuation, and other provisions that may be deemed appropriate and necessary to mitigate against a potential disaster.

~~**Policy 3-3** Limit public expenditure that encourages or subsidizes private development in the coastal high hazard area to the provision of services per density levels as determined by the Future Land Use Map, Policy 1-1 and as further limited by the Code of Ordinances.~~ ***[Moved to Policy FLU-3.4]***

~~**Policy 3-4** Limit public expenditure on vital barrier islands to the restoration or enhancement of natural resources.~~ ***[Moved to Policy FLU-3.5]***

Policy FLU-3.~~5~~3 Resilient Land Use and Investment

This policy shall not be interpreted to discourage lawful rebuilding, elevation, storm-hardening, infrastructure upgrades, or other resilience investments in established coastal residential neighborhoods, subject to applicable safety and environmental requirements.

Direct new population growth away from known or predicted coastal high hazard areas and environmentally sensitive areas except for residential development in compliance with the Future Land Use Map and as may be further limited by the Code of Ordinances. (See also Objective CCM-5 and related policies in the Conservation and Coastal Management Element.)

Policy FLU-3.~~3~~4 Coastal High Hazard Area

Limit public expenditure that encourages or subsidizes private development in the coastal high hazard area~~ to the provision of services per density levels as determined by the Future Land~~

~~Use Map, Policy 1-1 and as further limited by the Code of Ordinances.~~ ***[Moved from FLUE Policy 3-3]***

Policy FLU-3.~~4~~5 Barrier Islands

Limit public expenditure on vital barrier islands to the restoration or enhancement of natural resources and the hardening or adaptation of public facilities. ***[Moved from FLUE Policy 3-4]***



Objective FLU-4 Advance the Vision of the Green Jewel

In alignment with the Naples Vision of being the Green Jewel of Southwest Florida, proactively implement this community character concept by supporting and enhancing a network of environmentally sensitive land, parks, open space, and trees.

~~Natural resources of the City as shown on the Natural Resources and Coastal Resources Map will be protected and coordinated with future land use decisions according to the Future Land Use Map. Plans will be coordinated with Collier County and the State of Florida resource planning and management plans and procedures. Development approvals will consider the availability of public facilities and constraints due to topography and soil conditions.~~ ***[Moved to Policy FLU-4.4]***

~~**Policy 4-1** Review development requests for impacts on natural resources, which are identified on the Natural Resources Map and Coastal Resources Map. Proposed development must be consistent with the goals, objectives, and policies of the Conservation and Coastal Management Element, including impacts on soils and natural topography.~~ ***[Moved to Policy FLU-4.6]***

Policy FLU-~~1.7~~4.1 Promote Florida-Friendly Landscaping

Drought tolerant, low maintenance, Florida-Friendly landscaping practices[16] ~~Xeriscaping~~ shall be incorporated ~~to the greatest extent possible~~ into landscape plans for new development and replacement landscaping as a part of redevelopment and reuse projects. (See also Policy PROS-2.10 in the Parks, Recreation, and Open Space Element). ***[Moved from FLUE Policy 1-7]***

> **Action FLU-4.1.1** Identify necessary Land Development Code updates to improve landscaping and resilience requirements in order to incorporate Right Tree, Right Place and Florida Friendly landscaping practices. Coordinate these changes with other policies and actions in the Resiliency Element for co-benefits, including increasing shade by native plants, piloting cool pavement projects, reducing the urban heat island effect, incorporating nature-based solutions, and increasing opportunities for floodable park space.

[16] 2018-2021 PAB Recommendations.

> **Action FLU-4.1.2** Evaluate Land Development Code changes to open space requirements to better align with the Future Land Use Designations. (See also Policy PROS-1.8 in the Parks, Recreation, and Open Space Element).

> **Action FLU-4.1.3** Explore ways to advance local Florida Friendly landscaping through code regulations (incentives).

~~**Policy 4.2** Coordinate the Conservation and Coastal Management Element with the Future Land Use Element.~~ ***[Moved to Policy FLU-4.7]***

~~**Policy 4.3** Assist, where applicable, in the coordination and review of relevant policies of resource permitting agencies and of other government jurisdictions and establish specific procedures to do so.~~ ***[Moved to Policy FLU-4.8]***

~~**Policy 4.4** Coordinate the policies of the City of Naples and Collier County relating to the protection of potable water wellfields, recharge areas and other environmentally sensitive lands. Protection of these areas will be based on an annual evaluation of the existing wellfield protection ordinance that provides for the protection of health, life, resources and property through regulation of hazardous substances, sewage disposal, well construction, stormwater management, earth mining, solid waste and other related aspects of land use and development in the vicinity of public water supply wells.~~ ***[Moved to Policy FLU-4.9]***

~~**Policy 4.5** Assure consistency of local policy with other permitting agencies by reviewing permits issued within the City by other resource agencies.~~ ***[Moved to Policy FLU-4.10]***

~~**Policy 4.6** Review resource permitting agencies' functional plans on an annual basis to ensure consistency with local plans.~~ ***[Moved to Action FLU-4.10.1]***

Policy FLU-~~1.6~~4.2 Increase Green Space

Increase the amount of green space in the City through appropriate project design and attributes and through acquisition of land considering the current and future flood risk associated with lands.[17] ***[Moved from FLUE Policy 1-6]***

> **Action FLU-4.2.1** Identify funding mechanisms to support acquisition of land and integrate green space set asides into capital projects.

Policy FLU-4.3 Promote Tree Protection

Promote opportunities for nature-based solutions with resilience co-benefits by supporting the urban tree canopy, which reduces stormwater runoff, combats the urban heat island effect, enhances walkability and outdoor activities, softens noise pollution, promotes quiet enjoyment

[17] 2018-2021 PAB Recommendations to add "through acquisition of land." Balance of policy is carried forward from Policy 1-6.

for residents, and creates engaging outdoor spaces with beneficial ecological impacts including air quality. Promoting green stormwater infrastructure uses natural vegetation to treat stormwater before it is returned to natural waterbodies, providing ecosystem and resilience benefits. (See also Policy PROS-5.5 in the Parks, Recreation, and Open Space Element.)

> **Action FLU-4.3.1** Identify and protect the urban forest and large canopy trees. Expand the Code of Ordinance's protection of publicly owned trees to include protection of large canopy trees that are privately owned.

> **Action FLU-4.3.2** Create a program and associated Code of Ordinances amendments to support heritage tree protection (typically greater than 30 inches diameter at breast height (DBH).

> **Action FLU-4.3.3** Continue to support and expand the reach of community programs to encourage tree planting, such as the Arbor Day Giveaway.

> **Action FLU-4.3.4** Consider the creation of development incentives for preserving mature trees to protect tree canopy and support the urban forest. Potential incentives could include reduced landscape buffer requirements, expedited approvals, or credits toward open space or landscaping standards.

> **Action FLU-4.3.5** Continue to support the designation of Naples as Tree City USA, which includes maintaining a Tree Board, community tree ordinance, municipal spending on urban forestry, and celebrating Arbor Day.

> **Action FLU-4.3.6** Per the Urban Forest Green Print (2024) plan, identify, and implement strategies to mitigate notable canopy loss.

> **Action FLU-4.3.7** Per the Urban Forest Green Print (2024) plan, continue current successful tree programs, including the Invasive Exotic Tree Management Program and Designated Street Trees Program, which utilizes Right Tree, Right Place. Coordinate the Designated Street Tree Program with homeowners associations and the Urban Forestry Divisions in coordinated with the Concurrency and Capital Improvement Element.

> **Action FLU-4.3.8** Per the Urban Forest Green Print (2024) plan, continue the capital improvement funding of tree fill-in program and coordinate future efforts with the Resiliency Element.

Policy FLU-4.4 Coordinate Natural Resource Protection and Future Land Use

Natural resources of the City as shown on the ~~Natural Resources and~~ **Coastal Resources Map** will be protected and coordinated with future land use decisions according to the **Future Land Use** Map (see Appendix). Plans will be coordinated with Collier County and the State of Florida resource planning and management plans and procedures. Development approvals will consider the availability of public facilities and constraints due to topography and soil conditions. ***[Moved from Objective 4]***

Policy FLU-~~1-12~~4.5 Coordination with Conservation and Coastal Management Strategies

To protect, preserve, and enhance areas having significant ecological, hydrological, physical or socioeconomic importance to the public, new development or redevelopment located in areas of environmental sensitivity shall be consistent with the provisions of the Conservation and Coastal Management Element. The Code of Ordinances shall include development standards based on habitat types, suitability, ~~storm~~ flood protection, clearing, and submittal of a Development of Significant Environmental Impact Assessment. Preserving the integrity of those areas enhances the aesthetics and quality of life for city residents and visitors, provides a degree of natural protection against ~~storms~~floods, helps maintain air and water quality, promotes fish and wildlife and habitat diversification and productivity, and promotes soil stabilization. ***[Moved from FLUE Policy 1-12]***

Policy FLU-4.~~1~~6 Review for Impacts on Natural Resources

Continue to ~~R~~review development requests for impacts on natural resources, which are identified on the ~~Natural Resources and~~ **Coastal Resources Map** (see Appendix). Proposed development must be consistent with goals, objectives, and policies of the Conservation and Coastal Management Element, including impacts on soils and natural topography. ***[Moved from FLUE Policy 1-12.1 which was repeated in Policy 4-1]***

Policy FLU-4.~~2~~7 Coordination with Conservation and Coastal Management Strategies

Coordinate the Conservation and Coastal Management Element with the Future Land Use Element. ***[Moved from FLUE Policy 4-2]***

Policy FLU-4. ~~3~~8 Natural Resource Coordination

Assist, where applicable, in the coordination and review of relevant policies of resource permitting agencies and of other government jurisdictions and establish specific procedures to do so. ***[Moved from FLUE Policy 4-3]***

Policy FLU-4.~~4~~9 Environmentally Sensitive Land Protection

Coordinate the policies of the City of Naples and Collier County relating to the protection of potable water wellfields, recharge areas, and other environmentally sensitive lands. Protection of these areas will be based on an annual evaluation of the existing wellfield protection ordinance that provides for the protection of health, life, resources and property through regulation of hazardous substances, sewage disposal, well construction, stormwater

management, earth mining, solid waste and other related aspects of land use and development in the vicinity of public water supply wells. ***[Moved from FLUE Policy 4-4]***

Policy FLU-4.~~5~~10 Review of Permits

~~Assure~~ Ensure consistency of local policy with other permitting agencies by reviewing permits issued within the City by other resource agencies. ***[Moved from FLUE Policy 4-5]***

> ~~**Policy 4.6**~~ **Action FLU-4.10.1** Review resource permitting agencies' functional plans on an annual basis to ensure consistency with local plans. ***[Moved from FLUE Policy 4-6]***

Objective FLU-5 Future Land Use



Future development will be directed ~~as designated on the~~by the **Future Land Use Map** (located in the Appendix), Future Land Use Designations, and as described ~~and described in these~~ in the Future Land Use goals, objectives, ~~and~~ policies, and actions to provide opportunities for development consistent with the City's ~~2035 and 2045~~ projected populations. Designations are established to protect residential neighborhoods, ~~balance~~ identify and address inconsistent design and character of ~~land uses~~redevelopment with surrounding areas, provide opportunities for redevelopment of older commercial areas ~~and renewal of blighted areas~~, and encourage mixed use development.

Policy FLU-5.1 Consistent Land Uses

Land uses shall be consistent with permitted activities as detailed in Objective 1 and the designation description section of this element.

Policy FLU-5.2 Development Standards

Development shall be consistent with standards for subdivisions (regulating platting, design standards and improvement requirements), signs (regulating size, height, location and number), and stormwater management (regulating quantity and quality of stormwater runoff).

Policy FLU-5.3 Buffers and Transitions

Control land uses by requiring buffer areas between ~~inconsistent~~ incompatible land uses and establish transitional land use zones to ~~assure~~ ensure compatibility of land uses and surrounding character of the area. Buffering and transitions shall be evaluated using objective criteria addressing scale, intensity, traffic, noise, lighting, drainage, and impacts on adjacent residential properties.

> **Action FLU-5.3.1** Evaluate current buffering standards in the Code of Ordinances and identify if updates are needed to achieve the desired buffers and transitions between uses and adjacent developments with different intensities. Impacts to consider include noise, lighting, privacy, odor, and similar nuisances.

Policy FLU-5.4 Downtown Mixed Use

The downtown mixed use district shall encourage a broad range of service businesses and shall provide an opportunity for mixed uses, with emphasis on upper-story residential in commercial structures. Mixed-use redevelopment shall be coordinated with transportation, parking, drainage, utilities, and public-realm capacity, with particular attention to transitions adjoining established residential neighborhoods.

~~Policy 5.5 New residential development shall not be permitted within the high noise impact zone of the airport.~~ *[Moved to Policy FLU-8.4]*

Objective FLU-6 Protect Community Character

Protect community character through placekeeping efforts and design guidance. Identify and celebrate the City's characteristic public spaces, cultural features, iconic places, and landmarks. (See also Objective T-1 in the Transportation Element.)

Support Neighborhood Character and Thoughtful Renewal. Protect the distinct character and sense of place of Naples neighborhoods while accommodating compatible architectural evolution, reinvestment, redevelopment, and resilience improvements consistent with applicable zoning and property rights.

~~Identify, designate and preserve historically and architecturally significant resources including structures, landmarks, and archaeological sites~~ ***[Moved to Policy FLU-6.7]***



WHAT IS PLACEKEEPING?

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.

~~**Policy 6-1** Avoid adverse impacts on property, places, or sites that are on the Federal Register of Historic Places, Florida Master Site File, or designated as a local historic resource through official action by the City of Naples.~~ ***[Moved to Policy FLU-6.8]***

~~**Policy 6-2** Encourage private preservation and renovation of historically significant structures.~~ ***[Moved to Policy FLU-6.10]***

~~**Policy 6-3** Encourage owners of historic sites, places, or structures which are being considered for destruction to consider renovation through the approval of necessary variances to development standards.~~ ***[Moved to Policy FLU-6.9]***

~~**Policy 6-4** Coordinate Future Land Use policies with the Housing Element policies relevant to historical preservation.~~ ***[Moved to Policy FLU-6.13]***

~~**Policy 6-5** The City has designated the Palm Cottage Historic House Museum property, located at 137 Twelfth Avenue South, as "Public, Semi-Public and Institutional" on the Future Land Use~~

~~Map. This designation is intended only to support the continued use of this property as a local historic resource. If the structures on this property are damaged beyond repair, or if the property is no longer used as an historic house museum, this property will be reclassified as "Low Density Residential" on the Future Land Use Map.~~ ***[Moved to Policy FLU-6.14]***

~~**Policy 6-6** The City has designated the Wilkinson Home as an Historic House Museum property, located at 40 Ninth Avenue South, as "Public, Semi-Public and Institutional" on the Future Land Use Map. This designation is intended only to support the continued use of this property as a local historic resource. If the structures on this property are damaged beyond repair, or if the property is no longer used as an historic house museum, this property will be reclassified as "Low Density Residential" on the Future Land Use Map and the property will require a rezoning to "R1-15," Residence District from "PS," Public Service.~~ ***[Moved to Policy FLU-6.15]***

~~**Policy 6-7** Continue to monitor and identify historic sites, structures, landmarks and archaeological sites within the City limits.~~

~~**Policy 6-8** In conjunction with the Florida Historic Preservation office, establish criteria, standards, and procedures which should be used to avoid adverse impacts on historic properties and the encouragement of voluntary identification of historic resources.~~ ***[Moved to Action FLU-6.7.8]***

~~**Policy 6-9** Develop a voluntary mechanism for the identification and designation of properties outside of the existing Historic District as locally significant historic resources.~~ ***[Moved to Policy FLU-6.12]***

~~**Policy 6-10** Amend the Code of Ordinances criteria for the issuance of a variance or expansion of nonconformity to allow for the renovation, rehabilitation and compatible additions to historic or architecturally significant structures.~~ ***[Moved to Action FLU-6.7.7]***

~~**Policy 6-11** Continually evaluate incentives to offer to property owners of historic resources for the maintenance, rehabilitation and conservation of those historic resources.~~ ***[Moved to Action FLU-6.7.9]***

~~**Policy 6-12** Assist property owners of historic resources in obtaining designation on the Florida Master Site Files and/or Federal Register of Historic Places.~~ ***[Moved to Action FLU-6.12.1]***

~~**Policy 6-13** Publicize the incentives and assistance programs which are available for the protection and preservation of historic resources.~~ ***[Moved to Action FLU-6.12.2]***

Policy FLU-6.1 Update Guidelines and Regulations to Support Placekeeping Principles

Identify changes or additions to development standards that can better align with established character and site designs specifically addressing building heights, building massing, and open space.

> **Action FLU-6.1.1** Continue to update the Design Review Handbook as needed to provide more clear guidance about size and massing of redevelopment and new development and consider enhancing open space guidance and including guidance for pervious surfaces.

> **Action FLU-6.1.2** Update the Design Review Handbook to incorporate recommendations from the Green Print 2024 Urban Forestry Plan.

Policy FLU-~~1.3~~6.2 Compatibility and Character of Neighborhoods

Preserve and protect stable residential neighborhoods through development practices that promote reasonable compatibility in use, scale, and neighborhood context while allowing architectural diversity, property reinvestment, and responsible renewal. ~~compatibility and consistent character.~~ *[Moved from FLUE Policy 1-3]*

> **Action FLU-6.2.1** Following adoption of this Plan, conduct a one-time analysis of recent development projects with opportunity for improvement regarding character and design as identified through Naples 2045 community engagement. Utilize recommendations to propose amendments to the Land Development Code or the Design Review Board Handbook accordingly.

Policy FLU-6.3 Aid Private Developers in Achieving City Design Objectives

Consider ways to achieve the City's design intent at the time of project design and development and in the review of commercial and multifamily development design.

> **Action FLU-6.3.1** Consider adding professional design and/or architecture capacity to support the Planning Department. This role could serve as a type of ombudsman for private project implementation.

Policy FLU-6.4 Align Development Standards with Established Character and the Green Jewel Concept

Evaluate the Naples Land Development Code to identify and implement changes or additions to development standards that can better align with established character and site designs and support the concept of the Green Jewel of Southwest Florida within private commercial and residential developments. Any proposed amendments shall be informed by neighborhood-specific conditions, transparent public engagement, objective performance standards, and analysis of impacts on existing property rights and lawful redevelopment.

> **Action FLU-6.4.1** For Commercial and Mixed Use developments, evaluate minimum yards and setbacks, maximum building areas, and consider requiring open space, green space, or pervious areas.

> **Action FLU-6.4.2** For Multifamily developments, evaluate maximum lot coverage, minimum yards and setbacks, and heights to be in better alignment with the City's Charter (three floors and building heights of 42 feet to the peak of the roof, measured from the first floor, FEMA elevation). Also consider requiring open space, green space, or pervious areas.

> **Action FLU-6.4.3** For single-family homes, evaluate opportunities to 1) require a certain percentage of a site for open space, green space, or pervious surface area, and 2) implement landscaping requirements.

Evaluate whether additional single-family open-space, pervious-area, or landscape standards are necessary based on measurable drainage, canopy, and environmental outcomes, with appropriate flexibility for differing lot sizes, zoning districts, and established development patterns.

Action FLU-6.4.4 The City of Naples will study and make recommendations to amend the ~~Code of Ordinances~~Land Development Code to address impacts of larger homes on smaller lots within the City of Naples. These changes will be reviewed to determine their effectiveness. ***[Moved from Housing Policy 3-6]***

Study demonstrable impacts of building scale and lot coverage, including stormwater runoff, drainage, setbacks, and compatibility, rather than treating home size alone as an adverse impact. Consult affected neighborhoods before proposing Code amendments.

Policy FLU-6.5 Identify Character Elements to Protect

Identify character elements that are important to protect in established neighborhoods.

Action FLU-6.5.1 The City of Naples will prepare studies to identify character elements for protection.

Policy FLU-6.6 Old Naples Area Study Residential Neighborhood Area Study

The City of Naples will ~~initiate a~~use the existing study ~~of~~ prepared for the Old Naples area to guide determinations for ~~determine~~ architectural and ~~development standards~~site designs to protect and preserve the existing residential character of the area. ***[Moved from Housing Policy 3-5]***

The City of Naples will initiate a study of the city's neighborhoods to determine architectural and development standards to protect and preserve the existing residential character of the area.

Policy FLU-6.7 Protect Historically and Architecturally Significant Resources

~~Identify, designate, and~~ Preserve historically and architecturally significant resources including structures, landmarks, and archaeological sites. ***[Moved from Objective 6]***

Action FLU-6.7.1 ~~By 2019, Collier County and the City of Naples, will study~~ Study potential incentives to encourage the conservation, maintenance and rehabilitation of historic homes and ~~will~~ make recommendations to the City Council and to the Board of County Commissioners as to which incentives should be adopted. Recognize changing climate conditions and resilience and adaptation priorities in this effort. Consider the creation of performance criteria to guide the redevelopment of these properties to honor historic building characteristics and develop public-private partnerships to support this work. ***[Moved from Housing Policy 5-4]***

Action FLU-6.7.2 Create a public-facing map of iconic community structures and places

that are important contributors to the City's identity.

> **Action FLU-6.7.3** Develop citywide preservation and recognition programs to support placekeeping efforts, in particular for areas including the Pier, Baker Park, Naples Design District, Historical Palm Cottage, Lowdermilk Park, Fifth Avenue South (including the Fifth Avenue South Special Overlay District), and Third Street South (including the Third Street Commercial Area Special Overlay District).

Action FLU-6.7.4 Support the redevelopment of Naples Pier.

Action FLU-6.7.5 Coordinate preservation efforts with tree protection efforts, identifying heritage trees or other natural features. Consider climate risks and support efforts in collaboration with the Resiliency Element.

Action FLU-6.7.6 Establish policies, create partnerships, and consider development standards that encourage the inclusion of public art in public spaces and private development projects.

~~**Policy 6.10**~~ **Action FLU-6.7.7** ~~Amend the Code of Ordinances~~ Consider ~~criteria~~criteria for planning petitions that encourage the renovation, rehabilitation, and compatibility of ~~the issuance of a variance or expansion of nonconformity to allow for the renovation, rehabilitation and compatible~~[18] additions to historic or architecturally significant structures. ***[Moved from FLUE Policy 6-10]***

~~**Policy 6.8**~~ **Action FLU-6.7.8** In conjunction with the Florida Historic Preservation office and the Naples Historical Society, establish criteria, standards, and procedures which should be used to avoid adverse impacts on historic properties and the encouragement of voluntary identification of historic resources. ***[Moved from FLUE Policy 6-8]***

~~**Policy 6.11**~~ **Action FLU-6.7.9** Continually evaluate incentives to offer to property owners of historic resources for the maintenance, rehabilitation and conservation of those historic resources. ***[Moved from FLUE Policy 6-11]***

Policy FLU-6.~~1~~8 Avoid Adverse Impacts

Avoid adverse impacts on property, places, or sites that are on the ~~Federal~~ National[19] Register of Historic Places, Florida Master Site File, or designated as a local historic resource through official action by the City of Naples. ***[Moved from FLUE Policy 6-1]***

Policy FLU-6.~~3~~9 Encourage Renovation

Encourage owners of historic sites, places, or structures which are being considered for destruction to consider renovation through the approval of necessary variances to development standards. ***[Moved from FLUE Policy 6-3]***

[18] 2018-2021 PAB Recommendations.

[19] 2018-2021 PAB Recommendations.

Policy FLU-6.~~2~~10 Private Preservation and Renovation

Encourage private preservation and renovation of historically significant structures. ***[Moved from FLUE Policy 6-2]***

Policy FLU-6.11 Support Working Waterfronts

Working waterfronts are areas of economic activity or industry where people earn a living on or near the sea, such as fishing. Encourage preservation of recreational and commercial working waterfronts for water-dependent uses in coastal communities (in accordance with Florida Statute 163.3177 and 342.201, as amended). Consider strategies to support and encourage working waterfronts, such as the historic example of Tin City.

Policy FLU-6.~~9~~12 Identify New Historic Resources

Develop a voluntary mechanism for the identification and designation of properties outside of the existing Historic District as locally significant historic resources. ***[Moved from FLUE Policy 6-9]***

> ~~**Policy 6-12**~~ **Action FLU-6.12.1** Assist property owners of historic resources in obtaining designation on the Florida Master Site Files and/or Federal Register of Historic Places. ***[Moved from FLUE Policy 6-12]***

> ~~**Policy 6-13**~~ **Action FLU-6.12.2** Publicize the incentives and assistance programs which are available for the protection and preservation of historic resources. ***[Moved from FLUE Policy 6-13]***

Policy FLU-6.~~4~~13 Coordinate Historical Preservation Efforts

Coordinate Future Land Use policies with the Housing Element policies relevant to historical preservation. (See Housing Element Objective H-5.) ***[Moved from FLUE Policy 6-4]***

Policy FLU-6.~~5~~14 Palm Cottage Historic House Museum

The City has designated the Palm Cottage Historic House Museum property, located at 137 Twelfth Avenue South, as "Public, Semi-Public and Institutional" on the **Future Land Use Map** (located in the Appendix). This designation is intended only to support the continued use of this property as a local historic resource. If the structures on this property ~~are damaged beyond repair, or if the property is~~ are[20] no longer used as an historic house museum, this property will be reclassified as "Low Density Residential" on the Future Land Use Map. ***[Moved from FLUE Policy 6-5]***

Policy FLU-6.~~6~~15 Wilkinson Home

The City has designated the Wilkinson Home as an Historic House Museum property, located at 40 Ninth Avenue South, as “Public, Semi-Public and Institutional” on the Future Land Use Map.

[20] 2018-2021 PAB Recommendations.

This designation is intended only to support the continued use of this property as a local historic resource. If the structures on this property are damaged beyond repair, or if the property is no longer used as an historic house museum, this property will be reclassified as "Low Density Residential" on the Future Land Use Map and the property will require a rezoning to "R1-15," Residence District from "PS," Public Service. ***[Moved from FLUE Policy 6-6]***

Policy FLU-6.16 Expand Healthy Community Initiatives in Naples

In collaboration with health care organizations and other industry partners, seek to implement additional initiatives that aim to improve the overall health and well-being of the community.

Objective FLU-7 Neighborhood Planning



The City is comprised of neighborhoods and neighborhood planning is a tool to assist with identifying issues, needs, and proposed operational or capital improvements for different geographic areas of the City (See also the Concurrency and Capital Improvement Element, Objective CCI-1 and the Housing Element, Policy H-3.4.)

~~Assure the Naples Municipal Airport is managed in a manner which will best serve the overall interests of the community.~~ ***[Moved to Objective 8]***

~~**Policy 7.1** Prevent potential incompatibilities in land use surrounding the airport through zoning and land use planning.~~ ***[Moved to Policy FLU-8.1]***

~~**Policy 7.1.1** Land outside of the airport site, and located within the 60 LDN contour area shall require site plan approval by City Council.~~ ***[Moved to Policy FLU-8.2]***

~~**Policy 7-1.2** The Naples Airport Authority and City Council will meet quarterly annually for review and comment on proposed airport budget and development.~~ ***[Moved to Intergovernmental Coordination Action IC-1.11.1]***

~~**Policy 7.1.3** Prohibit any construction within the runway safety areas off of the airport property which would create potential safety hazards.~~ ***[Moved to Policy FLU-8.3]***

~~**Policy 7.2** Protect the water quality of Naples Bay by reducing the effects of runoff.~~ ***[Moved to Policy FLU-8.5]***

~~**Policy 7.2.1** Utilize a combination of existing wetlands, created wetlands, and other stormwater management technology, as appropriate, to manage stormwater runoff consistent with South Florida Water Management District regulations.~~ ***[Moved to Policy FLU-8.6]***

~~**Policy 7.2.2** Future development within airport boundaries shall be required to include a stormwater management system to meet the 25- year, 3-day storm event standard.~~ ***[Moved to Policy FLU-8.7]***

~~**Policy 7.3** Protect the quality of life in the community by implementing and enforcing appropriate and legal noise abatement procedures through the work of the Naples Airport Authority.~~ ***[Moved to Policy FLU-8.8]***

~~**Policy 7.4** Development within the "Future Development Designation" as delineated on the Overall Utilization Plan will require site plan approval by City Council.~~ ***[Moved to Policy FLU-8.10]***

~~**Policy 7.5** The Naples Airport should present the best possible image as an aviation gateway to the community.~~ ***[Moved to Policy FLU-8.12]***

~~**Policy 7.5.1** Maintain landscaping and aesthetic improvements along Airport Road and North Road frontage as delineated on the Overall Utilization Plan.~~ ***[Moved to Action FLU-8.12.1]***

~~**Policy 7.6** Emphasize the maintenance and enhancement of existing facilities before the development of additional facilities.~~ ***[Moved to Policy FLU-8.11]***

Policy FLU-7.1 Establish a Neighborhood Planning Process

The City shall create and maintain a Neighborhood Planning Process with neighborhood boundaries that will be used for neighborhood planning areas, a framework for neighborhood planning activities, neighborhood plan contents, and planning timeframes.

The Neighborhood Planning Process shall include early, meaningful consultation with residents, recognized neighborhood associations, and property owners, with published opportunities to review and comment on proposed neighborhood boundaries, priorities, and plans.

> **Action FLU-7.1.1** City staff will provide City Council with an assessment and recommendation for geographic areas of the City to be used for neighborhood planning areas, with neighborhood boundaries determined by areas of common development types and integrated infrastructure.

> **Action FLU-7.1.2** City staff will prepare neighborhood plans and determine the timing of updates to City Council to account for updates to the neighborhood plans and status of corresponding operational or capital improvement projects.

Neighborhood plans shall identify prioritized infrastructure and resilience needs, responsible City departments, potential funding sources, and a transparent mechanism for reporting progress and coordinating with the Five-Year Capital Improvements Program.



Objective FLU-8 Naples Municipal Airport

~~Assure~~ Ensure the Naples Municipal Airport is managed in a manner which will best serve the overall interests of the community. ***[Moved from Objective 7]*** (See also Intergovernmental Coordination Element Objective-IC.1 and Transportation Element Objective -T.1.)

Policy FLU-~~7~~8.1 Land Use Compatibility

Prevent potential incompatibilities in land use surrounding the airport through zoning and land use planning. ***[Moved from FLUE Policy 7-1]***

Policy ~~7-1.1~~FLU-8.2 Site Plan Approval in 60 LDN Contour Area

Land outside of the airport site, and located within the 60 LDN contour area shall require site plan approval by City Council. ***[Moved from FLUE Policy 7-1.1]***

Policy ~~7-1.3~~FLU-8.3 Prohibit Potential Safety Hazards

Prohibit any construction within the runway safety areas off of the airport property which would create potential safety hazards consistent with FAA requirements.[21] ***[Moved from FLUE Policy 7-1.3]***

Policy FLU-~~5.5~~8.4 Limit Residential Development near Airport

To address incompatibility of future development within the Naples Airport's Noise Impact Zone, ~~N~~new residential development shall not be permitted within the high noise impact zone ~~of the airport~~. ***[Moved from FLUE Policy 5-5]***

Policy FLU-~~7.2~~8.5 Airport Stormwater Management

Protect the water quality of Naples Bay by reducing the effects of runoff from the airport. ***[Moved from FLUE Policy 7-2]***

Policy FLU-~~7-2.1~~8.6 Managing Stormwater Runoff

Utilize a combination of existing wetlands, created wetlands, and other stormwater management technology, as appropriate, to manage stormwater runoff for the airport and surrounding areas consistent with South Florida Water Management District regulations. ***[Moved from FLUE Policy 7-2.1]***

Policy FLU-~~7-2.2~~8.7 Stormwater Management System

Future development within airport boundaries shall be required to include a stormwater management system.~~to meet the 25- year, 3-day storm event standard.~~[22] ***[Moved from FLUE Policy 7-2.2]***

Policy FLU-~~7-3~~8.8 Airport Noise Abatement

Protect the quality of life in the community by implementing and enforcing appropriate and legal noise abatement procedures through the work of the Naples Airport Authority. ***[Moved from FLUE Policy 7-3]***

> **Action FLU-8.8.1** Work with the Naples Airport Authority to implement the Noise Compatibility Program as designated.

Policy FLU-8.9 Airport Planning Coordination with City Council

Airport master planning efforts and any development or redevelopment projects will be closely coordinated with City Management leadership and City Council.

[21] 2018-2021 PAB Recommendations.

[22] 2018-2021 PAB Recommendations.

Policy FLU-~~7-4~~8.10 Site Plan Approval in Future Development Designation

Development within the "Future Development Designation" as delineated on the[23] ~~Overall~~ Airport Utilization Plan will require site plan approval by City Council. ***[Moved from FLUE Policy 7-4]***

Policy FLU-~~7-6~~8.11 ~~-~~Maintenance and Enhancement of Existing Facilities

Emphasize the maintenance and enhancement of existing facilities before the development of additional facilities. ***[Moved from FLUE Policy 7-6]***

Policy FLU-~~7-5~~8.12 Airport Landscaping and Overall Appearance

The Naples Airport should present the best possible image as an aviation gateway to the community. ***[Moved from FLUE Policy 7-5]***

> ~~**Policy 7-5.1**~~ **Action FLU-8.12.1** Maintain landscaping and aesthetic improvements along Airport Road and North Road frontage as ~~delineated~~ approved[24] on the ~~Overall~~ Airport Utilization Plan. ***[Moved from FLUE Policy 7-5.1]***

GENERALIZED FUTURE LAND USE

The location and configuration of the future land use designations are delineated on the **Future Land Use Map**. Essentially, the Future Land Use Map recognizes the existing land use patterns with one exception.

> The Downtown Mixed~~-~~ Use ~~District~~ area as detailed on the Future Land Use Map contains a mixture of existing uses with significant opportunity for future infill development and redevelopment. This district will continue to promote mixed uses with emphasis on commercial and residential uses in the same structure.

~~It is not the intention of this Comprehensive Plan to prohibit the issuance of development orders in which an existing legal nonconformity is significantly reduced in density or intensity of use, even though that reduction does not make it consistent with the Future Land Use Map.~~[25]

The **Future Land Use Map** is not intended to be used as a zoning map, but rather as a general indicator of desirable future land use and character relationships. In instances where lands are designated for a specific land use on the Future Land Use Map, such a designation shall not confer upon the land~~-~~owner the automatic right to such use. Before land may be utilized for the use indicated on the Future Land Use Map, it must be zoned in a district which permits the proposed use. Rezoning shall be in accordance with the standards and procedures as established by the Code of Ordinances and other applicable regulations. The Future Land Use Map identifies the most intense land uses that should be permitted. However, in some

[23] 2018-2021 PAB Recommendations.

[24] 2018-2021 PAB Recommendations.

[25] 2018-2021 PAB Recommendation.

instances, a less intense use (i.e., residential rather than commercial) may be acceptable and consistent with the intent of the Plan. Such instances will be evaluated on a case-by-case basis through the rezoning process.

In addition, the **Coastal Resources Map** (see Appendix) is not all-inclusive; it shows resources that have currently been identified but the extent of coastal and natural resources may be greater than what is identified on the map. The Coastal Resources Map does not replace the need for natural resource surveys such as individual project environmental surveys or submerged resources surveys.

The following pages provide~~s~~ a description of each land use designation including purpose, permitted uses, intensity/density, relationship with adjacent land uses, community character, and applicable development standards.

1. RESIDENTIAL

Residential areas designated on the Future Land Use Map are divided into nine (9) ~~classifications~~ designations according to use, density, and height. The permitted standards for each category are consistent with existing patterns in the City and will provide for a variety of housing types.

The factors used to determine the appropriate standards for each designation include existing development characteristics (use, density, and height), availability of public services and facilities, and the land uses of adjacent property. It is the intent of the Future Land Use Element to retain the predominant residential character of the City and promote balanced redevelopment and infill residential development that achieves residents' desired protection of community character.

a. **Beach Front Estates** areas designated on the Future Land Use Map are intended to provide low density single-family dwelling units along the southern beachfront area of the City. The minimum lot size in this district is one and one half (1½) acres.

b. **Low Density Residential** areas designated on the Future Land Use Map are intended to accommodate single-family or other similar residential uses of up to a maximum of six (6) dwelling units per net acre. The residential housing types in these areas may include traditional single-family detached homes and innovative cluster housing types, when such housing types can introduce a positive element of diversity into a neighborhood. This land use type is the most sensitive to disruption from the encroachment of incompatible uses; and protective strategies, such as transition zones of higher density residential areas, landscaped buffer areas, natural barriers, and other screening devices may be required.

c. The **Medium Density Residential** areas designated on the Future Land Use Map are intended to accommodate single- and multi-family residential densities of up to a maximum of twelve (12) dwelling units per net acre. Residential housing types in these areas may include traditional single-family detached, cluster, and low profile multi-family structures. Medium density residential areas encourage

the concentration of residential units with less open space per occupant than low density residential areas and may accommodate either transient, seasonal, or permanent residents, depending on the location. Certain uses other than residential may be permitted as conditional uses, subject to restrictions necessary to protect the residential integrity of these neighborhoods. Generally, medium-density residential areas are located adjacent to commercial or high-density residential areas, serving as transition zones to protect low density neighborhoods, and to take advantage of the benefits inherent in being in close proximity to the varied uses and activities found in commercial areas. Other medium density areas are located adjacent to water bodies to take advantage of the amenities and open space they provide.

d. The **High Density Residential** ~~District~~ designation is divided into five (5) subareas ~~districts~~ that permit multi-family development at densities ranging from fifteen (15) to eighteen (18) units per acre. The ~~districts~~ subareas are categorized primarily based on the number of permitted stories. Certain uses other than residential may be permitted as conditional uses subject to restrictions necessary to protect the integrity of these areas. Generally, the high density residential areas are located along Gulf Shore Boulevard North on some of the most desirable gulf and bayfront sites. The five High Density Residential designations include:

(1) **High Density Residential Low Rise Coquina Sands** Permits two (2) habitable stories over one (1) story of parking at fifteen (15) dwelling units per acre.

(2) **High Density Residential Low Rise Moorings** - Permits three (3) habitable stories over one (1) story of parking at fifteen (15) units per acres.

(3) **High Density Residential Mid Rise** - Permits seven (7) habitable stories over one (1) story of parking at fifteen (15) to eighteen (18) dwelling units per acre.

(4) **High Density Residential High Rise** - Permits nine (9) habitable stories over one (1) story of parking at eighteen (18) dwelling units per acre.

(5) **High Density Residential Towers -**Permits heights and density per the PD document (Park Shore) and applicable developer's agreement (Naples Cay).

e. **Mobile Home Residential** ~~The land use designation~~ encompasses an 8.1- acre site that accommodates a mobile home park. The mobile home park contributes to the diversity of affordable housing opportunities in the area. Uses are limited to mobile homes and recreational vehicles. Land uses other than mobile homes and recreational vehicles shall require an amendment to the Comprehensive Plan. No more than one hundred forty-one (141) mobile homes and thirty-one (31) recreational vehicle spaces shall be allowed on the site.

f. **Senior Living Residential areas designated on the Future Land Use Map** are intended to accommodate continuing care retirement communities and similar adult living facilities with residential units and complementary accessory healthcare and amenity uses that will allow the residents a full range of activities and progressive levels of care as they age. They may be comprised of independent living units, assisted living units, and skilled nursing units, or a combination of the foregoing, as well as accessory amenities. Independent living units qualify as dwelling units and include full kitchen facilities. Assisted living units are smaller hotel or suite sized units within a facility where medical care and basic living assistance is 24 hours a day. Skilled nursing units and supporting facilities provide a high level of around-the-clock specialized care for infirm persons suffering from acute illnesses and who require medical, skilled nursing or rehabilitative service including, without limitation, intravenous injections and physical therapy. The maximum permitted density is 18 dwelling units per acre for independent living, assisted living or skilled nursing units. Additional assisted living units and skilled nursing units are permitted at a ratio of one for every four independent living units as accessory to the independent living units. Non-residential uses within the community shall exist primarily to serve the residents of the community and shall be considered accessory to the residential development.

2. COMMERCIAL

Commercial areas designated on the Future Land Use Map identify the land areas appropriate for office, retail, service, and other commercial enterprises which primarily support ~~the~~ residents, while also supporting ~~and~~the tourist population in the City and the surrounding urban area.

Commercial areas should be consolidated into compact and cohesive areas in order to control strip commercial uses, provide spatial definition to shopping districts, prevent or correct destabilizing encroachment into residential neighborhoods, and to maintain property values.

a. **Highway Commercial** - The Land Use Plan recognizes the need for areas of "Highway Commercial" activities along the Tamiami Trail. The keys to controlling highway commercial development are strict traffic control measures and protection of adjoining incompatible land uses. This type of commercial activity shall be planned and developed with due consideration given to the principles of limited access, with controlled curb cuts, service or frontage roads to provide secondary access on large parcels or contiguous smaller parcels, "right-turn-only" exits when signalization is not used, lot sizes large enough to accommodate adequate on-site circulation and parking, landscaped buffer areas, professional architectural design standards, and sign controls.

b. **Limited Commercial –** These areas ~~are areas that~~ have distinct and limited commercial use. Two (2) such areas include the Third Street South Shopping District and the Crayton Cove Shopping District. These commercial areas shall be kept compact and unified so that all locations within these districts are within

convenient walking distances. Adequate and easily recognized off-street parking areas shall be provided at convenient locations on the perimeter of such districts. A mixture of compatible activities, such as retail, service, office, cultural, institutional, tourist-oriented facilities, and residential uses are appropriate and should encourage "twenty-four hour use" of these areas. A professional level of architectural and landscaping design should be encouraged, building intensity and height regulations should be carefully balanced, and landscaping and street plantings should be well established and maintained in order to present an attractive and pleasing environment, retain a "human scale," and create a sense of cohesiveness within each area. Adjoining residential areas must be properly protected to minimize adverse impacts by the commercial districts. Areas designated as "Limited Commercial" accommodate similar specialized commercial uses.

c. **Waterfront Mixed Use** – These areas designated on the Future Land Use Map are provided for flexibility in allowing different types of land uses within close proximity to one another. The intent of this district is to guide the redevelopment of bayfront property to allow for water-related and dependent uses as well as innovative waterfront development which provides public benefits in the redevelopment of this area. This area circles the north bay area from the Thirteenth Avenue South bayfront to U.S. 41 and east to the City limits. Development and redevelopment in these areas should be reviewed through the General Development Site Plan Review process. The primary factors for approval of waterfront areas should consider the degree of water dependent or related use, public waterfront access, and adequate parking. The ground floor of buildings in this district may only be used for commercial office or retail. All of the permitted uses within this district are allowed on the remaining stories.

d. **Airport Commercial** – This area designated on the Future Land Use Map is a limited commercial district intended to accommodate the Naples Municipal Airport and its related commercial and light industrial uses and related service facilities. These include the passenger and freight terminals, accessory uses and structures which are incidental to and customarily associated with such facilities; for example, runways, hangars, control tower, and navigation equipment. Related commercial and industrial uses may include aircraft sales and service, flight instruction, light industrial uses directly related to the airport and dependent upon an airport location for goods, services, or economic support; commercial uses that are intended to serve the needs of the travelling public, such as auto rentals, restaurants, and gift shops. Non-aviation related commercial activity shall also be permitted. All such uses and activities shall be consistent with the Airport Master Plan as approved by the City Council, and consistent with this Plan and other relevant City regulations such as the Code of Ordinances.

e. **Downtown Mixed- Use District** – This area currently contains a mixture of uses including commercial, heavy commercial, office, cultural, and institutional. The permitted uses in this district will continue to be mixed use with emphasis on

residential and commercial uses within the same structure. The dwelling units within this district are primarily intended for employees who work at businesses within the City, retirees and seasonal residents. By providing housing for employees, travel time and vehicle trips will be reduced, traffic impacts minimized, and the quality of life of the residents enhanced. The primary function of this district is to encourage redevelopment, improve the aesthetics and physical appearance, and provide for a prosperous, viable downtown. Redevelopment themes for this area shall include:

(1) Enhance building aesthetics and appearance.

(2) Encourage a cohesive and integrated district.

(3) Promote pedestrian access and activity.

(4) Encourage mixed uses.

(5) Emphasize an orderly pattern of circulation for both vehicular and pedestrian traffic.

(6) Enhance streetscape in the rights-of-way and medians.

(7) Encourage quality urban design including street lighting, landscaping, and consistent signage.

To protect the integrity of the downtown area as it relates to surrounding neighborhoods, the area that is designated as Downtown Mixed Use bounded by 5th Avenue South, 8th Street, 7th Avenue north, and Goodlette-Frank Road shall be subject to the following development standards:

- Maximum Aggregate density: 12 units per acre for 118 acres, or 1,416 units.
- Maximum Site Density: Up to 30 units per acre with provision for open space or payment into an open space fund, however, aggregate density limit of 1,416 units cannot be exceeded.
- Other areas designated as Downtown Mixed Use shall be limited to the standards in Policy 1-1 or by the more restrictive limitations imposed by zoning.

f. Business Park Commercial - This area designated on the Future Land Use Map is intended to accommodate a mix of industrial uses and office uses, with supporting commercial uses and service establishments. The primary function of this designation is to support the strengthening and diversification of the economic base of the city by situating industries, businesses, offices, institutional, commercial and service establishments in close proximity in an attractive park-like setting that benefits employees and patrons of the area. Landscaped streetscapes and architectural controls are encouraged to create a cohesive character within the Business Park area.

3. PUBLIC AND SEMI-PUBLIC

Lands designated for public and semi-public uses are divided into two (2) sub- classifications: one to identify land presently being used, or proposed to be used in the future, for open space and recreational purposes, and the other to identify land occupied, or to be occupied, by institutional or governmental buildings. (See also Objective IC-5 and related policies in the Intergovernmental Coordination Element.)

Land designated for "Public, Semi-Public and Private Recreation and Open Space" use on the Future Land Use Map includes such facilities as public parks, playgrounds, beaches, and other similar recreational areas, and private recreational uses such as private beaches, boating facilities, golf courses, tennis clubs, and other similar uses. ~~Floating solar facilities (floatovoltaics), as defined in F.S. Sec. 163.3205(2), shall also be permitted.~~

Land designated for "Public and Semi-Public Institutional" uses includes such public facilities as schools, libraries, governmental administration buildings, the City's Public Works complex, and private uses such as educational, religious, or cultural facilities.

Floating solar facilities (floatovoltaics), as defined in F.S. Sec. 163.3205(2), shall also be permitted in both Public and Semi-Public land use designations.~~.~~

4. CONSERVATION

The areas designated as environmentally sensitive lands are delineated on the Future Land Use Map. Preserving the integrity of these areas enhances the aesthetics and quality of life for City residents and tourists, provides a degree of natural protection against storms, helps maintain air and water quality, promotes marine and wildlife diversification and productivity, and promotes soil stabilization. Some of these areas have significant ecological, hydrological, physical, or socioeconomic importance to the public. Other areas have moderate resource benefits or have substantial benefits that are less susceptible to adverse effects from alterations. Within conservation zones, there may also be areas which are suitable for limited development. Before development can be approved, an environmental assessment must be prepared which details the specific habitats and communities present on the property and ~~takes into account~~considers site topography and hydrology. This environmental assessment must be submitted with the other applications required for such development. For more information on key types of conservation areas, see the Conservation and Coastal Management Element.

[Removed the description of conservation areas to avoid duplication with the Conservation and Coastal Management Element]

a. ~~**Submerged Resources** are defined as benthic habitat including, but not limited to, seagrass beds, oyster beds, shallow mud/sand flats (approximately 5 feet or less in depth), attached and drift algae, and intertidal zones.~~

b. ~~**Seagrass communities** are highly productive habitats which act as nurseries for a broad group of organisms such as juvenile fish and crustaceans. The grasses are a vital food source for many animals, including the endangered West Indian manatee. They also stabilize bottom sediments (which aids in water quality improvement) and add oxygen to the water during daylight hours. Marine grass beds should be identified on a project-by-project basis through the normal local,~~

state and federal dredge and fill permitting procedures, bulkhead and dock construction and maintenance dredging permitting, the general development and site plan review process, the development of significant environmental impact assessment, or the State's development of regional impact process.

c. **Oysters** are the ultimate filter feeders, continuously feeding on bacteria and fine particles in the water. This makes them excellent cleansers of bay waters. The predisposition of oysters to grow in clumps, or reefs, in the subtidal and intertidal zones, makes them exceptional shoreline protectors. Oysters are an important food source for many animals.

d. **Shallow Benthic Habitat**, whether or not it contains visible resources, is an important habitat to preserve due to the invertebrates that bury in the sediment and that live on the surface of the substrate, the potential of the substrate to house seagrass as a result of being in the photic zone, and the opportunities it provides for habitat restoration. Much of the historic shallow areas within the City have been dredged away, so protecting the remaining shallows is essential. For the purpose of this definition, shallow areas shall be defined as those areas 5 feet in depth or less at Mean High Water.

e. **Tidal swamp and marsh areas** are the vegetated areas above the low tide mark and below the yearly high storm mark. They are naturally vegetated with wet soil plants, usually salt tolerant types of grasses, rushes, or some combination of red, black, or white mangrove. They cleanse runoff waters and regularize their flow. They take up, convert, store, and supply basic nutrients to the coastal ecosystems. They provide essential habitats for various coastal birds, marine species, and wildlife. They stabilize shorelines, prevent erosion, slow the surge of flood waters, and reduce inland flooding.

f. **Freshwater swamp and marsh areas** are areas contiguous to, or that provide a continued connection between, surface water areas and tidal waters, mangroves, or marshes. They have a high freshwater table and support water tolerant vegetation. These wetlands serve to store and gradually release fresh water into tidal waters, thereby maintaining the salinity cycle of the estuarine system. By maintaining a high hydrostatic head, they provide a barrier to saltwater intrusion.

g. **Gulf beaches and dunes** extend landward of the mean high water (MHW) line and may include one (1) or more low dune ridges. They protect inland areas from storm and wave action, provide habitat and food sources to shorebirds and marine animals, and stabilize the shoreline.

h. **City Stormwater Lakes/Other Artificial Ponds** There are 31 ponds, or lakes, within City boundaries that were constructed 40-50 years ago to treat surface storm water runoff. Of these 31 ponds, 11 are managed by the City. These ponds, which are a part of the City's storm water management system, are antiquated with little to no maintenance being performed on them. This greatly reduces their ability to filter out pollutants, provide wetland habitat, and serve their storm water retention function. With many having direct outfalls or

flowways into our natural bays and Gulf, the impacts these ponds can have on estuarine water quality is significant. Most of these ponds are surrounded by residential homes, so engaging the homeowner regarding enhancements of these ponds is essential. Other artificial ponds are those ponds that are not a part of the City's stormwater system.

i. **Conservation Lands** are areas within the City that are acquired for conservation, preservation, restoration and maintenance of vital and significant resources and their biodiversity. These lands include: threatened natural lands, forest, upland and wetland communities, environmentally sensitive lands, lands that have been altered but are capable of being restored, improved or unimproved lands that may be useful and lands that contain conservation easements, scenic easements or any other similar designations, located within and adjacent to the City, for the benefit of present and future generations.

j. **Parks and Open Space** are public parks within the City as well as undeveloped lands that could potentially become parks.

5. ANNEXATION

The City of Naples does not seek to aggressively pursue or promote annexation to the City. The following standards and objectives will be considered when reviewing a petition for annexation (See also Objective IC-6 and related policies in the Intergovernmental Coordination Element):

a. Does the annexation provide greater control over natural resources and environmentally sensitive land?

b. Is the character of the built environment in the area to be annexed similar or complementary to the built environment in the City?

c. Will the voting power of existing constituents be diluted annexation potentially diminish access to public officials or access to public officials be diminished by the annexationdilute the voting power of existing constituents?

d. Is the area to be annexed within the existing City utility service areas?

e. Will the annexation significantly impact the City's level of service?

f. Will the annexation afford greater control over growth and related transportation and economic impacts?

g. Does the annexation provide a positive fiscal impact on the City immediately or over a short period of time?

h. Would a citywide referendum be advisable?

For Llands that are annexed into the City, formal annexation documents shall identify the applicable Collier County zoning and the comparable City zoning to be applied.use the following table for converting County zoning districts to City zoning districts and land use designations.

COUNTY ZONING	CITY ZONING	CITY LAND USE
PUD	PD	As applicable

COUNTY ZONING	CITY ZONING	CITY LAND USE
Estates	RE	Low Density Residential
RSF-3	R1-10	Low Density Residential
RSF-4	R1-7.5	Low Density Residential
RMF-6	R3-6	Low Density Residential
RMF-12	R3-12	Med. Density Residential
RMF-16	R3-15	High Density Residential
C-1	O	HC
C-2	HC	HC
C-3	HC	HC
C-4	HC	HC
C-5	C-3	HC
RO	PS	Institutional
GC	PS	Recreation
A-2	RE	Low Density Residential
ST	Conservation	Conservation

6. VESTED RIGHTS CLAIMS

The City of Naples recognizes that a potential exists for one or more property owners to assert a claim of vested rights or other claim as a result of because of the adoption or implementation of this Comprehensive Plan. In order to adequately address and establish a process for the City of Naples to receive and evaluate potential claims of vested rights or other legally recognized claims for relief including, but not limited to, a claim for relief pursuant to the Private Property Rights Protection Act embodied in Chapter 70, Florida Statutes and the City of Naples procedure for a vested rights or claims determination as provided in Chapter 46 of the Code of Ordinances.

FUTURE LAND USE DESIGNATIONS

The following pages provide summary descriptions by each Future Land Use Designation, organized by residential and then commercial categories from least to most dense or intense land use. Each land use designation includes:

- **Description and Intent:** general description of the Future Land Use Designation and the intended purpose of the category
- A list of the **Primary** and **Secondary Uses**
- Images to share examples of the land use **pattern** and **character** intended for that future land use type
- Building Blocks: a table identifying:
  - **Building height,** in the categories of Low, Medium, and High;
  - **Open space** recommendations; and
  - **Density** for residential uses and **intensity** for mixed-use and commercial uses.

BEACH FRONT ESTATES

DESCRIPTION

"Beach Front Estates" ~~areas designated on the Future Land Use Map~~ are intended to provide for low density single-family dwelling units along the southern beachfront area of the City. ***[Moved from Generalized Future Land Use (1.a) summary]***

INTENT

Most of the areas within this category are established neighborhoods. Larger single-family homes are on larger lots in this designation compared to other areas. Low-impact development methods are encouraged for new development to reduce stormwater runoff impacts and support adjacent coastal surface water quality.

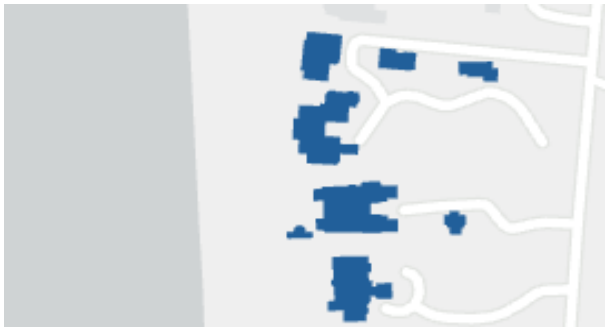
PRIMARY USES

- Single-family residential

SECONDARY USES

- Accessory dwelling units (also referred to as guest units)
- Accessory structures
- Recreational facilities

EXAMPLE PATTERN



EXAMPLE PATTERN



Example Pattern Photo Credit: Clarion Associates
Example Character Photo Credit: Google Maps Street View

BUILDING BLOCKS

Building Height	Low (1-3 stories, subject to limitations in Land Development Code and City Charter) ***[This building height range is based on an analysis of building heights allowed within existing zoning districts that overlap with this Future Land Use category as applied in the currently adopted Naples Comprehensive Plan]***
Open Space	Parks, tree-lined walkways, and/or trails should be provided as open space amenities. To the extent practicable, natural areas on private lots should be protected or reestablished through site design to support natural function and buffer adjacent uses. Incorporation of resilient elements into open space amenities should be prioritized, such as pervious surfaces.
Density/Intensity	Up to one (1) dwelling unit per 1.5 acres ***[Moved from Policy FLU-1.1 table]***

DESCRIPTION

"Low Density Residential" areas designated on the Future Land Use Map are intended to accommodate single-family or other similar residential uses. ~~of up to a maximum of six (6) dwelling units per net acre.~~ ***[Moved from Generalized Future Land Use (1.b) summary; redundant portion deleted and moved to Density/Intensity on next page]***

INTENT

The residential housing types in these areas may include traditional single-family detached homes and innovative cluster housing types~~, when such housing types can introduce a positive element of~~ to encourage a diversity of housing types in~~to~~ a neighborhood. This land use type is the most sensitive to disruption from the encroachment of incompatible uses.~~; and p~~Protective strategies, such as transition zones of higher density residential areas, landscaped buffer areas, natural barriers, and other screening devices may be required. ***[Moved from Generalized Future Land Use (1.b) summary]***

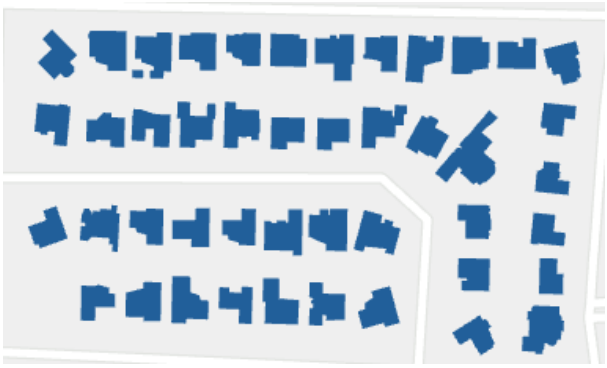
PRIMARY USES

- Single-family residential

SECONDARY USES

- Accessory dwelling units (also referred to as guest units)
- Civic/institutional
- Small and human-scale, neighborhood-serving commercial
- Parks and Open Space
- Cluster housing

EXAMPLE PATTERN



EXAMPLE CHARACTER





Example Pattern Photo Credit: Clarion Associates
Example Character Photo Credit: Google Maps Street View

BUILDING BLOCKS

Building Height	Low (1-3 stories) subject to limitations in Land Development Code and City Charter) ***[This building height range is based on an analysis of building heights allowed within existing zoning districts that overlap with this Future Land Use category as applied in the currently adopted Naples Comprehensive Plan]***
Open Space	Parks, tree-lined walkways, and/or trails should be provided as open space amenities. To the extent practicable, natural areas on private lots should be protected or reestablished through site design to support natural function and buffer adjacent uses. Incorporation of resilient elements into open space amenities should be prioritized, such as pervious surfaces.
Density/Intensity	Up to six (~~0~~ 6) dwelling units per acre ***[Moved from Policy FLU-1.1 table]***

MOBILE HOME RESIDENTIAL

DESCRIPTION

This land use designation encompasses an 8.1- acre site that accommodates a mobile home park. ***[Moved from Generalized Future Land Use (1.e) summary]***

INTENT

The mobile home park contributes to the diversity of affordable housing opportunities in the area. ~~Uses are limited to mobile homes and recreational vehicles. Land uses other than mobile homes and recreational vehicles shall require an amendment to the Comprehensive Plan.~~ No more than one hundred forty-one (141) mobile homes and thirty-one (31) recreational vehicle spaces shall be allowed on the site. ***[Moved from Generalized Future Land Use (1.e) summary, redundant sentences removed and second sentence listed in Secondary Uses below]***

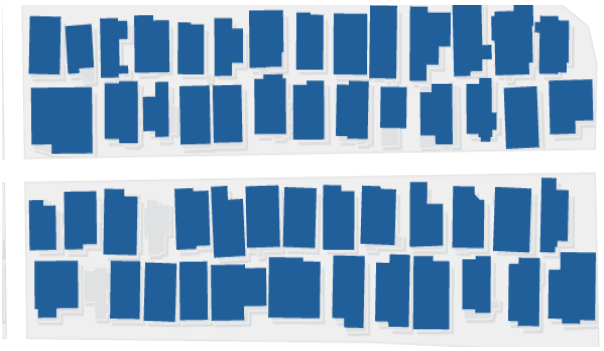
PRIMARY USES

- Mobile homes and recreational vehicles

SECONDARY USES

- Land uses other than mobile homes and recreational vehicles shall require an amendment to the Comprehensive Plan. ***[Moved from Generalized Future Land Use (1.e) summary]***

EXAMPLE PATTERN



EXAMPLE CHARACTER





Example Pattern Photo Credit: Clarion Associates
Example Character Photo Credit: Google Maps Street View

BUILDING BLOCKS

Building Height	Low (1-3 stories), subject to limitations in Land Development Code and City Charter) ***[This building height range is based on an analysis of building heights allowed within existing zoning districts that overlap with this Future Land Use category as applied in the currently adopted Naples Comprehensive Plan]***
Open Space	Parks, tree-lined walkways, and/or trails should be provided as open space amenities. To the extent practicable, natural areas on private lots should be protected or reestablished through site design to support natural function and buffer adjacent uses. Incorporation of resilient elements into open space amenities should be prioritized, such as pervious surfaces.
Density/Intensity	~~Total units capped at~~ Residential development subject to an aggregate unit cap, limited to 141 mobile home~~s~~ units and 31 recreational vehicle spaces per approved Planned Development (Ordinance 92-6778 dated 10/21/92) ***[Moved from Policy FLU-1.1 table]***

DESCRIPTION

Senior Living Residential areas designated on the Future Land Use Map are intended to accommodate ~~continuing care retirement communities and similar adult living facilities with residential units and complementary accessory healthcare and amenity uses that will allow the residents a full range of activities and progressive levels of care as they age.~~ full levels of care for residents as they age. ***[Moved from Generalized Future Land Use (1.f) edited for brevity]*** They may be comprised of independent living units, assisted living units, and skilled nursing units, or a combination of the foregoing, as well as accessory amenities. ***[Moved from Generalized Future Land Use (1.f) summary]***

INTENT

Independent living units qualify as dwelling units and include full kitchen facilities. Assisted living units are smaller hotel or suite sized units within a facility where medical care and basic living assistance is 24 hours a day. Skilled nursing units and supporting facilities provide a high level of around-the-clock specialized care for infirm persons suffering from acute illnesses and who require medical, skilled nursing or rehabilitative service including, without limitation, intravenous injections and physical therapy. ***[Moved from Generalized Future Land Use (1.f) summary]***

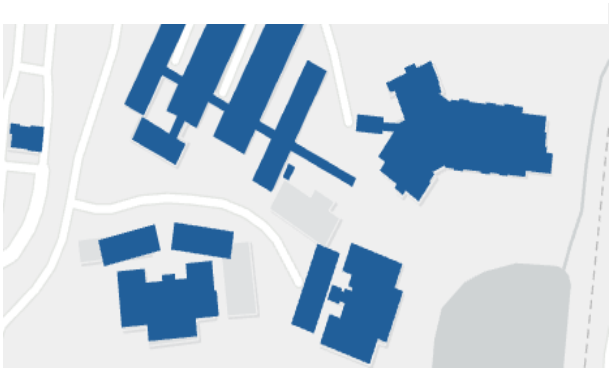
PRIMARY USES

- Independent living, assisted living units, skilled nursing, and other related units

SECONDARY USES

- Non-residential uses within the community shall exist primarily to serve the residents of the community and shall be considered accessory to the residential development. ***[Moved from Generalized Future Land Use (1.f) summary]***

EXAMPLE PATTERN



EXAMPLE CHARACTER





Example Pattern Photo Credit: Clarion Associates
Example Character Photo Credit: Moorings Park

BUILDING BLOCKS

Building Height	Medium (up to 5 stories), subject to limitations in Land Development Code and City Charter) ***[This building height range is based on an analysis of***

	building heights allowed within existing zoning districts that overlap with this Future Land Use category as applied in the currently adopted Naples Comprehensive Plan]
Open Space	Pocket parks, courtyards, tree-lined walkways, and/or shaded sidewalks, and landscaped yards should be provided as open space amenities. Incorporation of resilient elements into open space amenities should be prioritized, such as pervious surfaces.
Density/Intensity	~~The maximum permitted density is~~ Up to eighteen (18) dwelling units per acre, inclusive of ~~for~~ independent living, assisted living, or skilled nursing units, subject to applicable ratios and standards. Additional assisted living units and skilled nursing units are permitted at a ratio of one for every four independent living units as accessory to the independent living units. *[Moved from Generalized Future Land Use (1.f) summary, and edited for clarity]*

MEDIUM DENSITY RESIDENTIAL

DESCRIPTION

"Medium Density Residential" areas designated on the Future Land Use Map are intended to accommodate single- and multi-family residential densities of up to a maximum of twelve (12) dwelling units per net acre. *[Moved from Generalized Future Land Use (1.c) summary]*

Generally, medium-density residential areas are located adjacent to commercial or high-density residential areas, serving as transition zones to protect low density neighborhoods, and to take advantage of the benefits inherent in being in close proximity to the varied uses and activities found in commercial areas. Other medium density areas are located adjacent to water bodies to take advantage of the amenities and open space they provide. *[Moved from Generalized Future Land Use (1.c) summary]*

INTENT

Residential housing types in these areas may include traditional single-family detached, cluster, and low-profile multifamily structures. Medium density residential areas encourage the concentration of residential units with less open space per occupant than low density residential areas and may accommodate either transient, seasonal, or permanent residents, depending on the location. *[Moved from Generalized Future Land Use (1.c) summary]*

PRIMARY USES

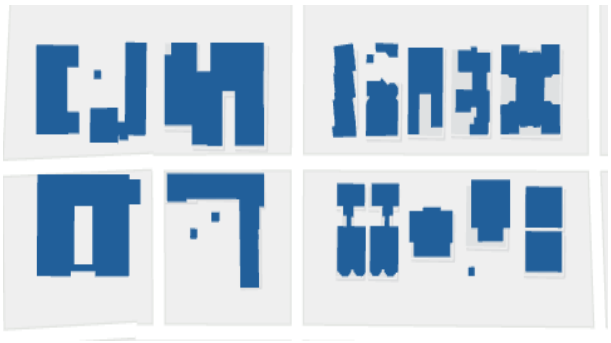
- Single-family residential
- Multifamily residential

SECONDARY USES

- Accessory dwelling units (also referred to as guest units)
- Certain uses other than residential may be permitted as conditional uses, subject to restrictions necessary to protect the residential integrity of these neighborhoods. *[Moved from Generalized Future Land Use (1.c) summary]*

BUILDING BLOCKS

EXAMPLE PATTERN



EXAMPLE CHARACTER





Example Pattern Photo Credit: Clarion Associates
Example Character Photo Credit: Google Maps Street

Building Height	Low (1-3 stories), subject to limitations in Land Development Code and City Charter) ***[This building height range is based on an analysis of building heights allowed within existing zoning districts that overlap with this Future Land Use category as applied in the currently adopted Naples Comprehensive Plan]***
Open Space	Pocket parks, courtyards, tree-lined walkways, and/or shaded sidewalks, and landscaped yards should be provided as open space amenities. Incorporation of resilient elements into open space amenities should be prioritized, such as pervious surfaces.
Density/Intensity	~~0~~ Up to twelve (12) dwelling units per acre ***[Moved from Policy FLU-1.1 table]***

HIGH DENSITY RESIDENTIAL LOW RISE COQUINA SANDS

DESCRIPTION

The High Density Residential Low Rise Coquina Sands Future Land Use designation is a residential area on the Future Land Use Map in the northern end of the City, to the east of Gulf Shore Boulevard North.

INTENT

Intended to accommodate the Coquina Sands neighborhood, this designation supports low-rise multifamily development.

PRIMARY USES

- Single-family residential
- Multifamily residential

SECONDARY USES

- Certain uses other than residential may be permitted as conditional uses subject to restrictions necessary to protect the integrity of these areas. ***[Moved from Generalized Future Land Use (1.d) summary]***

EXAMPLE PATTERN



EXAMPLE CHARACTER





Example Pattern Photo Credit: Clarion Associates
Example Character Photo Credit: Google Maps Street

BUILDING BLOCKS

Building Height	Low (1-3 stories), subject to limitations in Land Development Code and City Charter; Permits two (2) habitable stories over one (1) story of parking *[Moved from Generalized Future Land Use (1.d.(1)) summary]*
Open Space	Pocket parks, courtyards, tree-lined walkways, and/or shaded sidewalks, and landscaped yards should be provided as open space amenities. Incorporation of resilient elements into open space amenities should be prioritized, such as pervious surfaces.
Density/Intensity	~~0~~ Up to fifteen (15) dwelling units per acre *[Moved from Policy FLU-1.1 table]*

HIGH DENSITY RESIDENTIAL LOW RISE MOORINGS

DESCRIPTION

The High Density Residential Low Rise Moorings Future Land Use designation is a residential area on the Future Land Use Map in the central-western portion of the City, east of Gulf Shore Boulevard.

INTENT

- Intended to accommodate the Moorings neighborhood, this designation supports low-rise multifamily development.

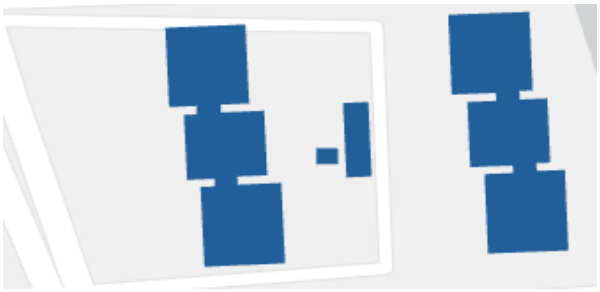
PRIMARY USES

- Single-family residential
- Multifamily residential

SECONDARY USES

- Certain uses other than residential may be permitted as conditional uses subject to restrictions necessary to protect the integrity of these areas. ***[Moved from Generalized Future Land Use (1.d) summary]***

EXAMPLE PATTERN



EXAMPLE CHARACTER





Example Pattern Photo Credit: Clarion Associates
Example Character Photo Credit: Google Maps Street

BUILDING BLOCKS

Building Height	Low (1-3 stories) to Medium (up to 5 stories), both subject to limitations in Land Development Code and City Charter; Permits three (3) habitable stories over one (1) story of parking ***[Moved from Generalized Future Land Use (1.d.(2)) summary]***
Open Space	Pocket parks, courtyards, tree-lined walkways, and/or shaded sidewalks, and landscaped yards should be provided as open space amenities. Incorporation of resilient elements into open space amenities should be prioritized, such as pervious surfaces.
Density/Intensity	~~0~~ Up to fifteen (15) dwelling units per acre ***[Moved from Policy FLU-1.1 table]***

HIGH DENSITY RESIDENTIAL-MID RISE

DESCRIPTION

The High Density Residential-Mid Rise Residential Future Land Use designation is a multifamily district.

INTENT

The intent of this designation is to provide high density and medium building height residential development in certain areas of the City.

PRIMARY USES

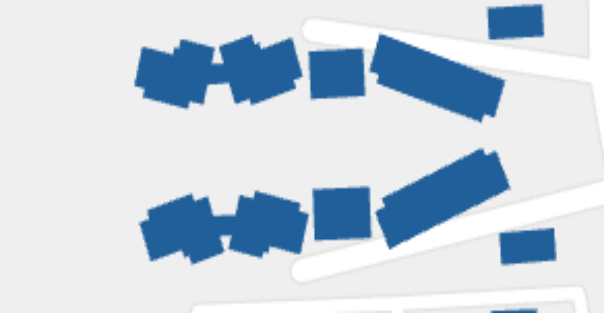
- Single-family residential
- Multifamily residential

SECONDARY USES

- Certain uses other than residential may be permitted as conditional uses subject to restrictions necessary to protect the integrity of these areas. ***[Moved from Generalized Future Land Use (1.d) summary]***

BUILDING BLOCKS

EXAMPLE PATTERN



EXAMPLE CHARACTER



Example Pattern Photo Credit: Clarion Associates
Example Character Photo Credit: Google Maps Street

Building Height	Medium (up to 5 stories) to High (5+ stories), subject to limitations in Land Development Code and City Charter; Permits 7 (seven) habitable stories over one (1) story of parking ***[Moved from Generalized Future Land Use (1.d (3)) summary]***
Open Space	Pocket parks, courtyards, tree-lined walkways, and/or sidewalks, and landscaped yards should be provided as open space amenities. Incorporation of resilient elements into open space amenities should be prioritized, such as pervious surfaces.
Density/Intensity	Between fifteen (15) and eighteen (18) dwelling units per acre ***[Moved from Policy FLU-1.1 table]***

DESCRIPTION

The High Density Residential -Towers Future Land Use is a residential designation intended for primarily multifamily residential, with single-family permitted.

INTENT

The intent of this designation is to provide higher density developments with higher building height in certain areas of the City.

PRIMARY USES

- Multifamily residential
- Single-family residential

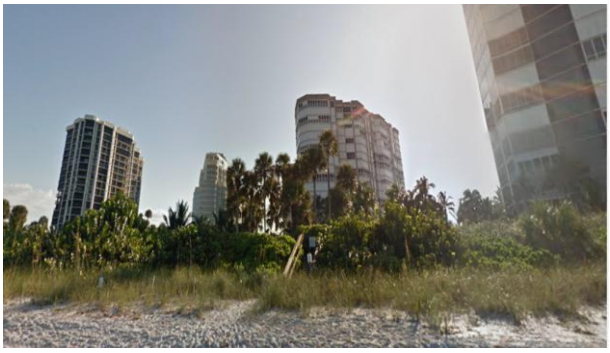
SECONDARY USES

- Certain uses other than residential may be permitted as conditional uses subject to restrictions necessary to protect the integrity of these areas. ***[Moved from Generalized Future Land Use (1.d) summary]***

EXAMPLE PATTERN



EXAMPLE CHARACTER





Example Pattern Photo Credit: Clarion Associates
Example Character Photo Credit: Google Maps Street

BUILDING BLOCKS

Building Height	Low (1-3 stories), subject to limitations in Land Development Code and City Charter); Permits heights and density per the PD document (Park Shore) and applicable developer's agreement (Naples Cay) ***[Moved from Generalized Future Land Use (1.d(5)) summary]*** Some existing developments were constructed prior to the application of the current building height restrictions.
Open Space	Pocket parks, courtyards, tree-lined walkways, and/or shaded sidewalks, and landscaped yards should be provided as open space amenities. Incorporation of resilient elements into open space amenities should be prioritized, such as pervious surfaces.
Density/Intensity	~~0~~ Up to twenty-five (25) dwelling units per acre and further limited by applicable PD/ Developer's Agreement ***[Moved from Policy FLU-1.1 table]***

DESCRIPTION

The High Density Residential-High Rise Future Land Use is a residential designation intended for primarily multifamily residential, with single-family permitted.

INTENT

The intent of this designation is to provide higher density developments with higher building height in certain areas of the City.

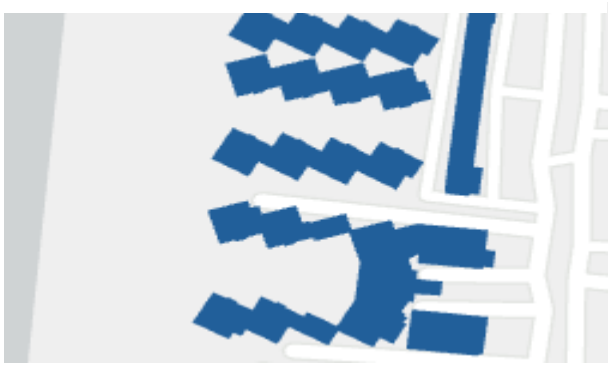
PRIMARY USES

- Multifamily residential
- Single-family residential

SECONDARY USES

- Certain uses other than residential may be permitted as conditional uses subject to restrictions necessary to protect the integrity of these areas. ***[Moved from Generalized Future Land Use (1.d) summary]***

EXAMPLE PATTERN



EXAMPLE CHARACTER





Example Pattern Photo Credit: Clarion Associates
Example Character Photo Credit: Google Maps Street

BUILDING BLOCKS

Building Height	Medium (up to 5 stories) to High (5+ stories), subject to limitations in Land Development Code and City Charter; Permits nine (9) habitable stories over one (1) story of parking ***[Moved from Generalized Future Land Use (1.d(4)) summary]***
Open Space	Pocket parks, courtyards, tree-lined walkways, and/or shaded sidewalks, and landscaped yards should be provided as open space amenities. Incorporation of resilient elements into open space amenities should be prioritized, such as pervious surfaces.
Density/Intensity	~~0~~ Up to eighteen (18) dwelling units per acre ***[Moved from Policy FLU-1.1 table]***

DESCRIPTION

The ~~"~~Airport Commercial~~"~~ area designated on the Future Land Use Map is a limited commercial district intended to accommodate the Naples Municipal Airport and its related ~~commercial and light industrial~~ uses ~~and related service facilities~~. ~~These include the passenger and freight terminals, accessory uses and structures which are incidental to and customarily associated with such facilities; for example, runways, hangars, control tower, and navigation equipment. Related commercial and industrial uses may include aircraft sales and service, flight instruction, light industrial uses directly related to the airport and dependent upon an airport location for goods, services, or economic support; commercial uses that are intended to serve the needs of the travelling public, such as auto rentals, restaurants, and gift shops. Non-aviation related commercial activity shall also be permitted.~~ All such uses and activities shall be consistent with the Airport Master Plan as approved by the City Council, and consistent with this Plan, ~~and~~ other relevant City regulations such as the Code of Ordinances, and in accordance with federal and state law. ***[Moved from Generalized Future Land Use (2.d) summary; redundant sentences deleted and included in Primary and Secondary Uses below]***

INTENT

Intended to accommodate the Naples Municipal Airport and related uses

PRIMARY USES

- ~~p~~Passenger and freight terminals ***[Moved from Generalized Future Land Use (2.d) summary]***

EXAMPLE PATTERN



EXAMPLE CHARACTER





Example Pattern Photo Credit: Clarion Associates
Example Character Photo Credit: Naples Airport Master

- ~~Non-aviation related c~~Commercial ~~activity shall be permitted~~uses for the Naples Municipal Airport and passenger and freight terminals ***[Moved from Generalized Future Land Use (2.d) summary]***
- R~~r~~elated commercial and light industrial uses, and related service facilities ***[Moved from Generalized Future Land Use (2.d) summary]***
- Related commercial and industrial uses may include:

- Aircraft sales and service
- Flight instruction
- Light industrial uses directly related to the airport and dependent upon an airport location for goods, services, or economic support
- Commercial uses that are intended to serve the needs of the travelling public, such as auto rentals, restaurants, and gift shops ***[Moved from Generalized Future Land Use (2.d) summary]***

SECONDARY USES

- Aaccessory uses and structures which are incidental to and customarily associated with such facilities, such as; for example, runways, hangars, control tower, and navigation equipment ***[Moved from Generalized Future Land Use (2.d) summary]***

BUILDING BLOCKS

Building Height	Low (1-3 stories), subject to limitations in Land Development Code and City Charter) ***[This building height range is based on an analysis of building heights allowed within existing zoning districts that overlap with this Future Land Use category as applied in the currently adopted Naples Comprehensive Plan]***
Open Space	Resilient, green infrastructure components may be appropriate for certain uses.
Intensity/Density	40% building coverage ***[Moved from Policy FLU-1.1 table]***

DESCRIPTION

"Limited Commercial" areas ~~are areas that have~~ are intended for distinct, specialized, and limited commercial use. This designation accommodates the City's prestigious shopping areas and a limited amount of residential. Two ~~(2)~~ such areas include the Third Street South Shopping District and the Crayton Cove Shopping District. ***[Moved from Generalized Future Land Use (2.b) summary]*** Adjoining residential areas must be properly protected to minimize adverse impacts by the commercial districts. Areas designated as "Limited Commercial" accommodate similar specialized commercial uses. ***[Moved from Generalized Future Land Use (2.b) summary]***

INTENT

These commercial areas shall be kept compact and unified so that all locations within these districts are within convenient walking distances. Adequate and easily recognized off-street parking areas shall be provided at convenient locations on the perimeter of such districts.

A mixture of compatible activities, such as retail, service, office, cultural, institutional, tourist-oriented facilities, and residential uses are appropriate and should encourage "twenty-four hour use" of these areas.

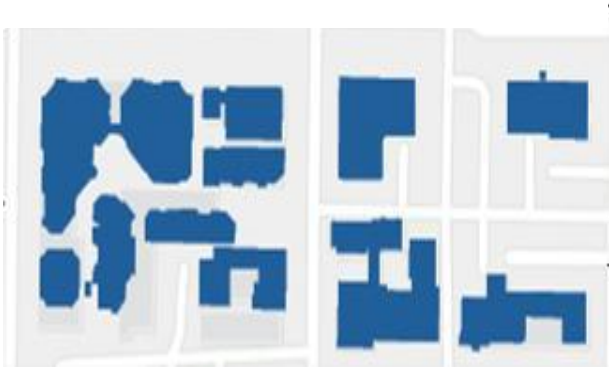
A professional level of architectural and landscaping design should be encouraged, building intensity and height regulations should be carefully balanced, and landscaping and street plantings should be well established and maintained in order to present an attractive and pleasing environment, retain a "human scale," and create a sense of cohesiveness within each area. ***[Moved from Generalized Future Land Use (2.b) summary]***

PRIMARY USES

- Commercial (Retail, Office)
- Mixed-use
- Residential

SECONDARY USES

EXAMPLE PATTERN



EXAMPLE CHARACTER





Example Pattern Photo Credit: Clarion Associates
Example Character Photo Credit: Google Maps Street

- Parks, recreation, and open space

BUILDING BLOCKS

Building Height	Low (1-3 stories), subject to limitations in Land Development Code and City Charter) ***[This building height range is based on an analysis of building heights allowed within existing zoning districts that overlap with this Future Land Use category as applied in the currently adopted Naples Comprehensive Plan]***
Open Space	Pocket parks, tree-lined walkways, and/or shaded sidewalks should be provided as open space amenities. Incorporation of resilient elements into open space amenities should be prioritized, such as pervious surfaces.
Density/Intensity	50% building coverage ***[Moved from Policy FLU-1.1 table]***

DESCRIPTION

~~The Land Use Plan~~ This designation recognizes the need for areas of "Highway Commercial" activities along the Tamiami Trail. ***[Moved from Generalized Future Land Use (2.a) summary]***

INTENT

The keys to controlling highway commercial development are strict traffic control measures and protection of adjoining incompatible land uses. This type of commercial activity shall be planned and developed with due consideration given to the principles of limited access, with controlled curb cuts, service or frontage roads to provide secondary access on large parcels or contiguous smaller parcels, "right-turn-only" exits when signalization is not used, lot sizes large enough to accommodate adequate on-site circulation and parking, landscaped buffer areas, professional architectural design standards, and sign controls. ***[Moved from Generalized Future Land Use (2.a) summary]***

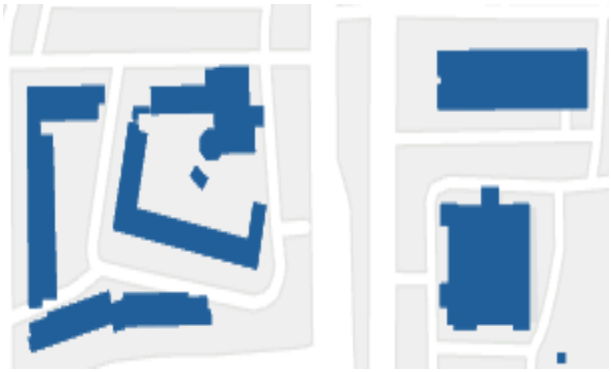
PRIMARY USES

- Commercial/Retail
- Office

SECONDARY USES

- Civic/Institutional
- Healthcare
- Parks and Open Space

EXAMPLE PATTERN



EXAMPLE CHARACTER





Example Pattern Photo Credit: Clarion Associates
Example Character Photo Credit: Google Maps Street

BUILDING BLOCKS

Building Height	Low (1-3 stories), subject to limitations in Land Development Code and City Charter) ***[This building height range is based on an analysis of building heights allowed within existing zoning districts that overlap with this Future Land Use category as applied in the currently adopted Naples Comprehensive Plan]***
Open Space	Tree-lined walkways and small courtyards should be provided as open space amenities. Incorporation of resilient elements into open space amenities should be prioritized, such as pervious surfaces.
Density/Intensity	30% building coverage ***[Moved from Policy FLU-1.1 table]***

DOWNTOWN MIXED USE

DESCRIPTION

The ~~"~~Downtown Mixed- Use~~ District"~~ designation currently contains a mixture of uses ~~including commercial, heavy commercial, office, cultural, and institutional~~ designed to prioritize the pedestrian experience with opportunities for future infill development and redevelopment. ***[Moved from Generalized Future Land Use (2.e) summary and modified to summarize]***

INTENT

The permitted uses in this category will continue to be mixed use with emphasis on residential and commercial uses within the same structure. The dwelling units within this district are primarily intended for employees who work at businesses within the City, retirees, and seasonal residents.

By providing housing for employees, travel time and vehicle trips will be reduced, traffic impacts minimized, and the quality of life of the residents enhanced. The primary function of this district is to encourage redevelopment, improve the aesthetics and physical appearance, and provide for a prosperous, viable downtown.

Redevelopment themes for this area shall include:

- Enhance building aesthetics and appearance.
- Encourage a cohesive and integrated district.
- Promote pedestrian access and activity.
- Encourage mixed uses.
- Emphasize an orderly pattern of circulation for both vehicular and pedestrian traffic.
- Enhance streetscape in the rights-of-way and medians.
- Encourage quality urban design including street lighting, landscaping, and consistent signage.

[Moved from Generalized Future Land Use (2.e) summary]

PRIMARY USES

- Commercial and heavy commercial
- Office
- Mixed Use

EXAMPLE PATTERN



EXAMPLE CHARACTER





Example Pattern Photo Credit: Clarion Associates
Example Character Photo Credit: Google Maps Street

- Residential

SECONDARY USES

- Cultural and institutional
- Parks, recreation, and open space

BUILDING BLOCKS

Building Height	Low (1-3 stories), subject to limitations in Land Development Code and City Charter) ***[This building height range is based on an analysis of building heights allowed within existing zoning districts that overlap with this Future Land Use category as applied in the currently adopted Naples Comprehensive Plan]***
Open Space	Tree-lined walkways and small courtyards should be provided as open space amenities. Incorporation of resilient elements into open space amenities should be prioritized, such as pervious surfaces.
Density/Intensity	To protect the integrity of the downtown area as it relates to surrounding neighborhoods, the area that is designated as Downtown Mixed Use bounded by 5th Avenue South, 8th Street, 7th Avenue north, and Goodlette-Frank Road shall be subject to the following development standards: • *Maximum Aggregate density:* 12 units per acre for 118 acres, or 1,416 units. • *Maximum Site Density:* Up to 30 units per acre with provision for open space or payment into an open space fund, however, aggregate density limit of 1,416 units cannot be exceeded. Other areas designated as Downtown Mixed Use shall be limited to the standards in Policy 1.1 or by the more restrictive limitations imposed by zoning. ***[Moved from Generalized Future Land Use (2.e) summary]***

DESCRIPTION

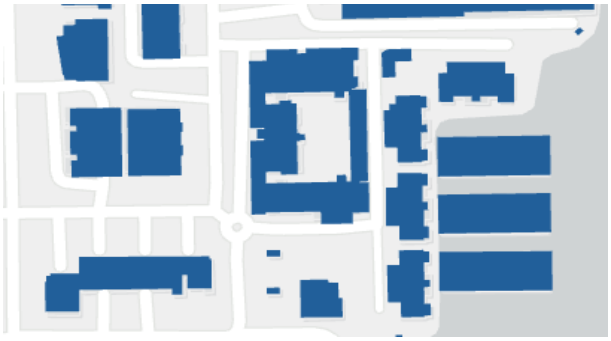
~~"~~Waterfront Mixed Use~~"~~ areas designated on the Future Land Use Map ~~are~~ provide~~d for~~ flexibility in allowing different types of land uses within close proximity to one another. ***[Moved from Generalized Future Land Use (2.c) summary]*** This area circles the north bay area from the Thirteenth Avenue South bayfront to U.S. 41 and east to the City limits. ***[Moved from Generalized Future Land Use (2.c) summary]***

INTENT

The intent of this district is to guide the redevelopment of bayfront property to allow for water-related and dependent uses as well as innovative waterfront development which provides public benefits in the redevelopment of this area. ***[Moved from Generalized Future Land Use (2.c) summary]*** Development and redevelopment in these areas should be reviewed through the General Development Site Plan Review process. ***[Moved from Generalized Future Land Use (2.c) summary]***

The primary factors for approval of waterfront areas should consider the degree of water dependent or related use, public waterfront access, and adequate parking. The ground floor of buildings in this district may only be used for commercial office or retail. All of the permitted uses within this district are allowed on the remaining stories. ***[Moved from Generalized Future Land Use (2.c) summary]***

EXAMPLE PATTERN



EXAMPLE CHARACTER



Example Pattern Photo Credit: Clarion Associates
Example Character Photo Credit: Google Maps Street

PRIMARY USES

- Mixed Use
- Commercial
- Multi-Family residential

SECONDARY USES

- Parks, recreation, and open space

BUILDING BLOCKS

Building Height	Low (1-3 stories), subject to limitations in Land Development Code and City Charter) ***[This building height range is based on an analysis of building heights allowed within existing zoning districts that overlap with this Future Land Use category as applied in the currently adopted Naples Comprehensive Plan]***
Open Space	Tree-lined walkways and small courtyards should be provided as open space amenities. Incorporation of resilient elements into open space amenities should be prioritized, such as pervious surfaces.
Density/Intensity	~~Marinas or marine research, development and testing 50%; other 40% building coverage~~ Building coverage: 50% marina-related uses; 40% other uses ***[Moved from Policy FLU-1.1 table]***

DESCRIPTION

The "Business Park Commercial" area designated on the Future Land Use Map is intended to accommodate a mix of industrial uses and office uses, with supporting commercial uses and service establishments. ***[Moved from Generalized Future Land Use (2.f) summary]***

INTENT

The primary function of this designation is to support the strengthening and diversification of the economic base of the city by situating industries, businesses, offices, institutional, commercial and service establishments in close proximity in an attractive park-like setting that benefits employees and patrons of the area. Landscaped streetscapes and architectural controls are encouraged to create a cohesive character within the Business Park area. ***[Moved from Generalized Future Land Use (2.f) summary]***

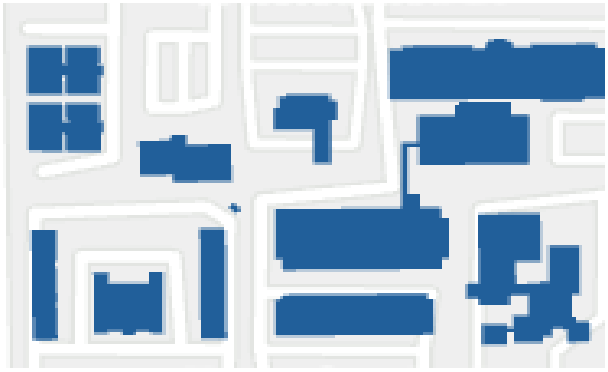
PRIMARY USES

- Commercial (professional and business uses, retail, services, utilitarian businesses, and other related commercial uses),
- Industrial (manufacturing, distribution, storage, and repair uses)
- Civic uses (public utility offices, government facilities)

SECONDARY USES

- Outdoor storage and parking garages

EXAMPLE PATTERN



EXAMPLE CHARACTER





Example Pattern Photo Credit: Clarion Associates
Example Character Photo Credit: Google Maps Street

BUILDING BLOCKS

Building Height	Low (1-3 stories), subject to limitations in Land Development Code and City Charter) ***[This building height range is based on an analysis of building heights allowed within existing zoning districts that overlap with this Future Land Use category as applied in the currently adopted Naples Comprehensive Plan]***
Open Space	Pocket parks, tree-lined walkways, and shaded sidewalks should be provided as open space amenities. Incorporation of resilient elements into open space amenities should be prioritized, such as pervious surfaces.
Density/Intensity	60% building coverage ***[Moved from Policy FLU-1.1 table]***

DESCRIPTION

Land designated for "~~P~~Public and Semi-Public Institutional"~~.~~ uses includes such public facilities as schools, libraries, governmental administration buildings, ~~he City's Public Works complex,~~ and public works facilities~~,~~. ~~and~~ ~~p~~Private uses ~~such as~~ include educational, religious, or cultural facilities. Floating solar facilities (floatovoltaics), as defined by F.S. Sec. 163.3205(2), shall also be permitted. ***[Moved from Generalized Future Land Use (3) summary]***

INTENT

Support quality of life and the provision of public services through institutional land uses.

PRIMARY USES

- Public and private institutional uses

SECONDARY USES

- Parks, recreation, and open space
- Floating solar facilities

EXAMPLE PATTERN



EXAMPLE CHARACTER





Example Pattern Photo Credit: Clarion Associates
Example Character Photo Credit: Google Maps Street

BUILDING BLOCKS

Building Height	Low (1-3 stories), subject to limitations in Land Development Code and City Charter) ***[This building height range is based on an analysis of building heights allowed within existing zoning districts that overlap with this Future Land Use category as applied in the currently adopted Naples Comprehensive Plan]***
Open Space	Parks, tree-lined walkways, or trails should be provided as open space amenities. To the extent practicable, natural areas of the site should be protected or reestablished through site design to support natural function. Incorporation of resilient elements into open space amenities should be prioritized, such as pervious surfaces.
Density/Intensity	45% building coverage ***[Moved from Policy FLU-1.1 table]***

PUBLIC, SEMI-PUBLIC, AND PRIVATE RECREATION AND OPEN SPACE

DESCRIPTION

Recreation areas are lands presently being used or proposed to be used in the future for open space, floodplain management, and recreational purposes.

INTENT

~~Land designated for "Public, Semi-Public and Private Recreation and Open Space" use on the Future Land Use Map~~ This designation includes facilities such as public parks, playgrounds, beaches, and other similar recreational areas, and private recreational uses such as private beaches, boating facilities, golf courses, tennis clubs, and other similar uses. Floating solar facilities (floatovoltaics), as defined in F. S. Sec. 163.3205(2), shall also be permitted. ***[Moved from Generalized Future Land Use (3) summary]***

PRIMARY USES

- Recreation
- Open Space
- Floodplain Management

SECONDARY USES

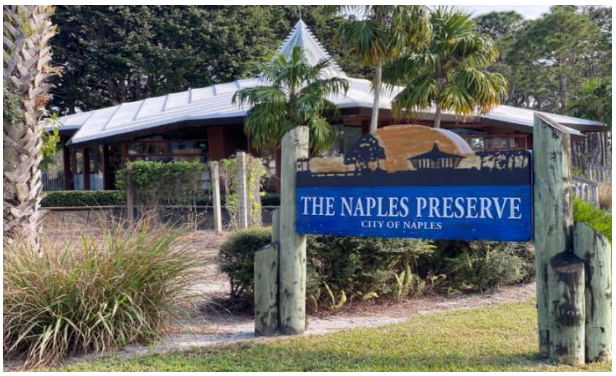
- Floating solar facilities

EXAMPLE PATTERN



EXAMPLE CHARACTER





Example Pattern Photo Credit: Clarion Associates
Example Character Photo Credit: Google Maps Street

BUILDING BLOCKS

Building Height	Low for main structure (1-3 stories, subject to limitations in Land Development Code and City Charter) ***[This building height range is based on an analysis of building heights allowed within existing zoning districts that overlap with this Future Land Use category as applied in the currently adopted Naples Comprehensive Plan]***
Open Space	Open space is a key component to the Recreation category to protect land with high ecological value and prevent the building of facilities in areas with flood hazards. These areas also serve as floodplain management.
Intensity/Density	~~N/A~~ Not applicable. ***[Moved from Policy FLU-1.1 table]***

DESCRIPTION

~~The areas designated as~~ Conservation areas are environmentally sensitive lands ~~are~~ delineated on the Future Land Use Map. ***[Moved from Generalized Future Land Use (4) summary]*** Within conservation zones, there may also be areas which are suitable for limited development. Before development can be approved, an environmental assessment must be prepared which details the specific habitats and communities present on the property and takes into account site topography and hydrology. This environmental assessment must be submitted with the other applications required for such development. ***[Moved from Generalized Future Land Use (4) summary]***

INTENT

Preserving the integrity of these areas enhances the aesthetics and quality of life for City residents and tourists, provides a degree of natural protection against storms, helps maintain air and water quality, promotes marine and wildlife diversification and productivity, and promotes soil stabilization.

Some of these areas have significant ecological, hydrological, physical, or socioeconomic importance to the public.

Other areas have moderate resource benefits or have substantial benefits that are less susceptible to adverse effects from alterations. ***[Moved from Generalized Future Land Use (4) summary]*** (See descriptions of types of conservation areas in the Generalized Future Land Use (4) summary.)

PRIMARY USES

- Conservation

SECONDARY USES

- Recreation
- Limited residential or commercial development based on environmental assessment
- Flood storage

EXAMPLE PATTERN



EXAMPLE CHARACTER





Example Pattern Photo Credit: Clarion Associates
Example Character Photo Credit: City of Naples

BUILDING BLOCKS

Building Height	Low (1-3 stories, subject to limitations in Land Development Code and City Charter) ***[This building height range is based on an analysis of building heights allowed within existing zoning districts that overlap with this Future Land Use category as applied in the currently adopted Naples Comprehensive Plan]***
Open Space	Open space is a key component to the Conservation category to protect land with high ecological value and prevent the building of facilities in areas with flood hazards. These areas also aid in the storage of flood waters.
Intensity/Density	1 unit per net 5 acres (as determined through DSEI) ***[Moved from Policy FLU-1.1 table]***

~~COMMUNITY PROFILE~~ *[THIS ENTIRE SECTION HAS BEEN UPDATED AND MOVED TO THE PLAN'S INTRODUCTION CHAPTER]*

~~This section provides a brief overview of the City demographics, including population estimates and projections, income, age, race and ethnicity, and land use analysis.~~

~~Florida Statutes Section 163.3177(5) requires that local government comprehensive plans include at least two planning periods covering a short-term planning horizon of ten years and a long-term horizon of twenty years. The data collected and analyzed for preparation of the City of Naples' Comprehensive Plan includes projections through the years 2035 and 2045. In accordance with Florida Statutes Section 163.3177(1)(f)2., the data collected and analyzed has been taken from professionally accepted sources and is based on a professionally acceptable methodology.~~

~~1. POPULATION ESTIMATES AND PROJECTIONS~~

~~The following table depicts the permanent estimates and projections for the City of Naples and Collier County obtained from the University of Florida Shimberg Center for Housing Studies, based on 2010 and 2020 U.S. Census data and population projections by the Bureau of Economic and Business Research, University of Florida.~~

~~As indicated in the following tables, the City of Naples is the central city for one of the fastest growing counties in the United States; however, despite steady countywide permanent population growth, the overall average growth rate for Naples is decreasing. Population in the City is expected to continue decreasing at a moderate pace throughout the 10- and 20- year planning horizon. As noted in the following sections, the City's anticipated population decline~~

may be attributed to decreases in average household size, progression of an aging population, significantly high median household income, an increasing number of seasonal housing units, and limited developable vacant land.

Permanent Population Estimates and Projections

	2023 Estimate	2025 Projection	2030 Projection	2035 Projection	% Change (2023-2035)	2040 Projection	2045 Projection	% Change (2023-2045)
City of Naples	19,306	19,269	19,131	18,870	-2.3%	18,532	18,165	-5.9%
Collier County	399,480	412,441	439,115	461,185	15.4%	477,690	492,326	23.2%

Notes: Counts refer to estimated or projected number of persons.

Sources: Estimates by Florida Legislative Office of Economic and Demographic Research; City projections by Shimberg Center for Housing Studies, based on 2010 and 2020 U.S. Census data and population projections by the Bureau of Economic and Business Research, University of Florida. County projections. Countywide projections provided by Collier County Zoning Division, May 16, 2023.

Permanent population estimates and projections only include the resident population and do not include seasonal or part-time visitors. When planning for future development and for the provision of services, careful consideration should be made to ensure that it is based on a total population to be served within the planning period and not just full-time residents.

Although the Census does not collect seasonal *population* data, seasonal housing *unit* information, or vacant housing units "for seasonal, recreational, or occasional use", is provided which could be used to determine a total maximum population. As shown in the table below, "seasonal units" represent a significant percentage of housing units in the area. According to the 2022 American Community Survey 5-year estimates, the City of Naples has a total of 18,501 housing units. Of the total housing units, 9,823 (54%) are occupied and 8,402 (46%) are vacant. Of the vacant housing units, 7,609 (41% of all housing units) are classified as "vacant units for seasonal, recreational, or occasional use". To determine how many additional seasonal residents this may represent, the number of seasonal housing units was multiplied by the annual average household size. Adding the estimated seasonal population to the permanent population yields a high estimate for total population within the City.

City of Naples Housing Occupancy and Permanent and Seasonal Population Estimates

	2010	2020	2022
Total Housing Units	17,753	18,225	18,501
Occupied Housing Units	10,231 (58%)	9,823 (54%)	9,583 (52%)
Vacant Housing Units	7,522 (42%)	8,402 (46%)	8,918 (48%)
Seasonal Housing Units	5,830 (33%)	7,292 (40%)	7,609 (41%)
Other Vacant	1,692 (9%)	1,110 (6%)	1,309 (15%)
Average Household Size	1.88	2.05	1.97
Estimated Seasonal Population	10,960 (36%)	14,949 (44%)	14,990 (43%)
Permanent Population	19,537 (64%)	19,115 (56%)	19,618 (57%)
Total Population - High Estimate	30,497	34,064	34,608

Notes: Counts refer to estimated number of housing units

Sources: American Community Survey, ACS 5-year Estimates Data Profiles, Tables DP04 and B25004, Year 2022; American Community Survey, ACS 5-year Estimates Data Profiles, Tables B25010, Year 2020; U.S. Census Bureau, Decennial Census, DEC Demographic and Housing Characteristics, Tables H1 and H5, Year 2020; U.S. Census Bureau, Decennial Census, DEC Summary File 1, Tables H1, H5, and H12, Year 2010; U.S. Census Bureau, "Population Estimates", *Quick Facts*.

The "total population high estimate" indicates that there may be around 34,000 full- and part-time residents in Naples. Although this is valuable information, it is an estimate of the *potential maximum* population which assumes that permanent and seasonal residents are all staying in Naples at the same time and duration of visit. For planning purposes and in compliance with state statutes, the City proposes to utilize peak season population estimates and projections for analysis through the extended planning period.

Peak season population estimates and projections for Naples for the 10- and 20- year planning horizon are derived by increasing the permanent population projection by 20% (.20), which is consistent with the methodology used by Collier County. Similar to permanent population projections, peak season population is projected to decline over the planning horizon. Since the proposed planning horizon year is 2045, the City must also ensure that it evaluates and identifies land use needs to accommodate the projected population in 2045 and compare that with the land use allowances of the present FLUM.

Peak Season Population Estimates and Projections

	2023 Estimate	2025 Projection	2030 Projection	2035 Projection	2040 Projection	2045 Projection
City of Naples	23,167	23,123	22,957	22,644	22,238	21,798
Collier County	479,376	494,929	526,938	553,422	573,228	590,791

Notes: Counts refer to estimated or projected number of persons.

Sources: City projections are derived by increasing the permanent population projections prepared by the Shimberg Center for Housing Studies (based on 2010 and 2020 U.S. Census data and population projections by the Bureau of Economic and Business Research, University of Florida) by 20%. Countywide projections provided by Collier County Zoning Division, May 16, 2023.

2. INCOME

Income data was obtained from the U.S. Census Bureau, American Community Survey, ACS 5-year estimates detailed tables for 2010, 2020 and 2022. The median household income in Naples in 2022 dollars, was $135,657 with only 6.0% of the population considered below poverty level. The per capita income was $141,245. Meanwhile, the 2022 Collier County median household income was $82,011 and per capita income was $56,666. Approximately 10.4% of the Collier County population and 12.7% of all people in Florida are considered below poverty level. Since 2010, both median household income and income per capital in Naples have increased approximately 80% while Countywide income growth has been more modest, with increases of 39% for median household income and 53% for per capita income. The discrepancy in income increases between the City and County is likely due to growth in the County and displacement of workforce housing with redevelopment and gentrification. As property values increased closer to the Gulf of Mexico, workforce personnel, particularly larger family households, appear to be relocating outside of the City limits.

3. AGE

While the median age in the City in 2000 was 60.7 years, the Census reports the median age increased to 64.2 years in 2010 and 67.0 years in 2020. In the County, the median age in 2000 was 44.1 years, and increased to 46.9 years in 2010 and 52.9 years in 2020. Senior residents age 65 and older accounted for 42% of the City's 2000 population compared to 48.5% in 2010 and 54.8% in 2020. Thus, the majority of people in the City are retirees.

xCountywide, the percentage of residents over 65 increased from 24.5% in 2000 to 25.1% in 2010 and 32.6% in 2020. The City's person per household increased from 1.92 in 2000 to 2.02 in 2010 and 2.05 in 2020. Collier County had a person per household of 2.39 in 2000 while the 2010 Census reflected 2.63 persons per household and 2.54 in 2020. Although the percentage of senior residents in the County has modestly increased, the persons per household has also

increased while the City's has decreased. As such, Countywide projected populations are expected to increase while the growth rate in the City is projected to decline.

4. RACE & ETHNICITY

The racial and ethnic composition of the City's population has not significantly changed over the last twenty years. The 2000 census indicated that 92.5% of the population was white, 4.6% was black and 2.9% fit the "other" category. The 2020 Census indicated that over 95.8% of City residents identify as one race and 5.2% consider themselves as more than one race. Of those identifying as one race alone, 94.4% are white, 2.8% are black, 1.1% Asian, and 1.7% are "other".

5. LAND USE ANALYSIS

According to the 2022 Collier County Economic, Demographic & Community Profile, Collier County is the largest county in Florida by land area (1,998 square miles) and fourth largest by total area. By contrast, the City has a much more compact and urban development pattern. The total area of Naples is 16.4 square miles, of which 12.30 square miles is land and 4.1 square miles (or 25.09%) is water. As of 2020, the population density of the City was 1,553.6 persons per square mile, whereas Collier County was 188.2 persons per square mile.

The following table provides a breakdown of the land area within the City by Future Land Use Map Designation. As depicted, more than one-third of the land in Naples is classified as Low Density Residential and represents the largest future land use designation. Overall, nearly 52% of the land has a Residential Future Land Use Map Designation, and another 5.7% is Commercial Mixed Use. The next largest land area, at more than 13% of the total land area, is designated Public, Semi-Public and Private Recreation and Open Space. Based on the anticipated growth decrease and given that the City is largely built-out, the land use will accommodate the 10-year and 20-year population projections.

Future Land Use Map Designation	Acres	%
Residential: Beach Front Estates	53.99	0.67%
Residential: Low Density	2,892.23	35.81%
Residential: Medium Density	720.82	8.92%
Residential: High Density	536.92	6.65%
Residential: Mobile Home	6.82	0.08%
Residential: Senior Living	22.06	0.27%
Commercial: Highway	447.70	5.54%

Future Land Use Map Designation	Acres	%
Commercial: Limited	63.08	0.78%
Commercial: Waterfront Mixed Use	61.72	0.76%
Commercial: Airport	622.21	7.70%
Commercial: Downtown Mixed Use	396.74	4.91%
Commercial: Business Park	111.56	1.38%
Public, Semi-Public Institutional	212.83	2.64%
Public, Semi-Public and Private Recreation and Open Space	1,063.40	13.17%
Conservation	836.50	10.36%
Runway	28.35	0.35%
TOTAL	8,076.93	100.00%

Source: City of Naples Information Technology Services GIS, April 2024.



4

HOUSING ELEMENT

In this Section:

Statement of Purpose

Introduction

~~Methodology~~

Goal~~s~~, Objectives, and Policies

STATEMENT OF PURPOSE

Per the Florida State Statute §163.3177(1)(f), ~~T~~the purpose of the Housing Element is to develop plans, programs, and policies that will guide the creation of an adequate supply of decent, safe, sanitary, and affordable housing for all current and future City and County residents.

This goal will be achieved through implementation of a variety of programs based on an analysis of housing trends, and the scope, causes and nature of housing problems.

To achieve this housing goal, policies and programs will be developed to encourage public/private partnerships between governmental agencies and the private, for-profit and not-for-profit sectors of the community. Procedures for periodic review, revision, and monitoring will also be implemented.

To meet the projected affordable housing needs for all residents, including very low, low- and moderate-income households, a combination of objectives and policies have been established. Essentially these strategies fall into six (6) major areas:

- Provide for the adoption of a joint Housing Element for Collier County and the City of Naples that strives to increase the supply of housing and furthers intergovernmental coordination and the consolidation of housing programs.
- Encourage public/private partnership efforts and financial incentives, including the coordination of information and resources, to ensure that all housing partners are apprised of housing assistance programs and resources, and any changes as they occur.
- Establish a comprehensive inventory of existing housing units, reduce the number of substandard housing units and increase the number of housing programs and funding sources.
- Encourage conservation and preservation of historically significant resources.
- Allow for special needs housing, including group homes and foster care facilities and rural and migrant farmworker housing.
- Address local development regulations and land use related issues.

To achieve the stated goal and objectives, the following recommendations are made:

- Greater utilization of intergovernmental agreements between Collier County and the City of Naples.
- Establish a comprehensive housing delivery system through partnerships with local governments, non-profits, private developers and other interested parties.
- The creation of a non-profit housing corporation.
- Review of existing City and County codes to ensure compliance with all State and Federal regulations and the amendment of said codes as necessary.
- Eliminate substandard housing:
    - Increase rehabilitation programs.
    - Review existing housing codes every two (2) years.

    - Increased code enforcement.
- Increase public/private partnership and financial incentives:
    - Encourage the financial community to increase its mortgage assistance programs, reduce the amount of closing costs, and provide lower interest rates.
    - Provide impact fee relief.
    - Review property tax exemption programs.
    - Encourage developers to set aside units for low income housing or donate land to be used to develop mixed income housing.
    - Consider implementation of a transfer of development rights program for affordable housing.
- Coordinate support programs and information:
    - Utilize an existing entity such as the County's Housing and Urban Improvement (HUI) office to coordinate public and private efforts to produce affordable housing and serve as an information and referral center.
    - The Board of County Commissioners and the City Council provide support to local organizations submitting applications to obtain Federal and State funding.

REGARDING THE FORMAT OF THIS JOINT HOUSING ELEMENT

The Housing Element Goal and all of the Objectives pertain to the entire County. The majority of all policies pertain to the entire County and are identified as JOINT CITY/COUNTY POLICIES.

However, some policies pertain to only one jurisdiction and therefore are specially referenced as a CITY OF NAPLES POLICY or a COUNTY POLICY. Policies that are asterisked (*) are included for informational purposes only pursuant to Chapter 163 F.S. Policies identified as COUNTY POLICIES are not being adopted by the City of Naples. Policies identified as CITY POLICIES are not being adopted by Collier County. These policies are provided for informational purposes only.

INTRODUCTION

In 1993, with the advent of the State Housing Initiatives Partnership (SHIP), the City of Naples and Collier County governments began an alliance to address the community-wide need for additional affordable housing. Through a series of interlocal agreements, the two governmental entities developed a coordinated approach to address the housing needs of the very low, low- and moderate-income residents within Collier County.

In 1993, a SHIP interlocal agreement provided for Collier County to administer the SHIP funding on behalf of the City of Naples and Collier County (County Ordinance No. 93-19 and 93-33 and City Ordinance No. 93-7001). In 1995, the City of Naples approved Resolution No. 95-7410 that reauthorized the SHIP Interlocal Agreement process with Collier County for three (3) additional years. In July 1994, the City and the County adopted an affordable housing interlocal agreement that reflected the view that affordable housing is a community-wide concern and established a goal of five hundred (500) affordable housing units being built each year within the urban area. In addition, in December 1994 the City and the County adopted a memorandum of understanding that allows the City to use its annual allocation of HUD Community Development Block Grant (CDBG) funds in unincorporated Collier County (Resolution No. 94-7324).

This Housing Element is updated to incorporate the joint City/County and County policies per the Collier County Housing Element as amended on January 8, 2013, through Collier County Ordinance 2013-10.

More recent actions taken by Collier County include the following:

- Approval of a Land Development Code amendment (Ordinance 2019-02) to provide new affordable housing definitions and enact the Affordable Housing Density Program (AHDB Program), which is established to increase the affordable housing density bonus from eight extra units per acre up to 12 extra units per acre.
- Approval of a Land Development Code amendment (Ordinance 2021-05) providing relief from specified processes, to better ensure cost certainty and savings for projects containing housing that is affordable.
- Approval of Land Development Code amendments (Ordinance 2025-37) accomplishing implementation of several Growth Management Plan affordable housing initiatives: (a) expanding the allowance for commercial development with a residential use or a mixed-use development (residential and commercial) when providing for housing that is affordable; (b) increasing density within Activity Centers from 16 units per acre to 25 units per acre when providing for housing that is affordable; and (c) increasing density opportunities along bus/transit lines.

With the adoption and implementation of this joint Housing Element, the local governing bodies will further the intergovernmental coordination efforts initiated in 1993 and beyond. In particular, the City will work with Collier County to evaluate options for incentivizing

philanthropic groups to fund development of affordable-workforce housing units. This could include advising the organizations on tax benefits and other financial incentives, such as federal tax credits, for financially supporting development of affordable-workforce housing.[1]

Within the State Comprehensive Plan (Section 187.201(4)(a), F.S.), the goal for the public and private sectors "shall increase the affordability and availability of housing for low income and moderate-income persons, including citizens in rural areas, while at the same time encouraging self-sufficiency of the individual and assuring environmental and structural quality and cost-effective operations." In line with the State's goal, it is the joint goal of the City of Naples and Collier County "to create an adequate supply of decent, safe, sanitary, and affordable housing for all residents of Collier County." The recently enacted Live Local Act (Chapter 2023-17, Laws of Florida (CS/SB 102)) provides additional requirements for local governments to support affordable housing. The Act requires governments to administratively approve development projects that fit the following criteria:

- At least 40% of the development's units are deed-restricted affordable (120% of area median income or less) for at least 30 years.
- For mixed-use projects, 65% of the square footage is for residential purposes and 40% of those residential units are deed-restricted affordable (120% of area median income or less).
- Affordable housing developments are located in commercial, industrial, or mixed-use zoning districts.

The ~~Data and Analysis~~Naples 2045 Comprehensive Plan Introduction includes supporting documentation that provides an inventory and analysis of the existing housing stock within the City. As required by state statute, these data and studies were used as the basis for the Goal, Objectives, and Policies in this Housing Element. ~~and the County including special categories of housing~~. ~~The Housing Element and the accompanying Data and Analysis support documentation is intended to be consistent with the State and Regional Comprehensive Plans.~~

[1] PAB recommendation with the addition of an example prepared by consultant team.

~~METHODOLOGY~~

~~Data provided within the Housing Element support document is the best available data. Data has been provided using the recent data available.~~

~~To comply with the statutory requirements of Section 163.3177(6)(f), F.S., data has been provided on the number and distribution of dwelling units by type, tenure, age, rent, value, monthly cost of owner-occupied units, and rent or cost-to-income ratio and other required components. Data sources have been identified and these resources include the U.S. Census, University of Florida's Bureau of Business and Economic Research and the Shimberg Center and locally generated data from Collier County and the City of Naples.~~

~~All required data and analysis is included as support documentation and is not adopted as a part of the Comprehensive Plan.~~

GOAL, OBJECTIVES, AND POLICIES

GOAL

To create an adequate supply of decent, safe, sanitary, accessible and affordable housing for all residents of Collier County.

Objective H-1 Provide Affordable Housing to Support Current and Future Community Needs

Provide additional affordable housing units in order to meet the current and future housing needs of populations projected through the 10-year (2035) and 20-year (2045) planning horizon with very-low, low and moderate incomes, including households with special needs such as rural and farmworker housing in rural Collier County.

JOINT CITY/COUNTY POLICIES

Policy H-1.1 Indexing Demand

~~Collier County shall pursue interlocal agreements with the City of Naples, the City of Marco Island, and Everglades City to require that each city provide its proportionate share of affordable-workforce housing units (or the financial equivalent). Each city's proportionate share and financial equivalent will be evaluated and substantiated by the most current data, studies, and methods available to the County.~~ ***[Moved to Policy H-1.6]*** **By January 14, 2014, the Department of Housing, Human, and Veteran Services shall establish a method of indexing the demand for very-low, low.** moderate, **and affordable workforce housing.**[2]

Policy H-1.2 Indexing Availability and Cost

~~Collier County and the City of Naples will work together to accomplish the community-wide goal of creating a sufficient supply of market rate and below market rate housing. This effort will include consolidating the City and County housing programs and activities, including State and Federally funded programs such as SHIP and CDBG, in an effort to provide greater efficiency.~~ ***[Moved to Policy H-1.7]*** By January 14, 2014, the Department of Housing, Human, and Veteran Services shall establish a method of indexing the availability and costs of very-low, low, moderate, and affordable workforce housing.[3]

Policy H-1.3 Methodology for Projecting Future Need

~~The City of Naples and Collier County will explore the development of a fair share affordable housing ordinance that will require commercial and residential developments to address the lack of affordable housing. The local jurisdiction will evaluate a broad range of options including the development of an affordable housing impact fee, the requirements that a percentage of units developed will be "set aside" for below market rate housing, provide for the transfer of development rights, an option whereby land could be donated to a non-profit and/or placed in a land bank, or other alternatives that will assist in mitigating the rising need for affordable housing as the population increases.~~ ***[Moved to Policy H-1.8]*** By January 14, 2014, the Department of Housing, Human and Veteran Services shall develop methods to predict future need, based on the indexes established in Policies 1.1 and 1.2 above.[4]

[2] Language incorporated from Collier County Housing Element Policy 1.1.
[3] Language incorporated from Collier County Housing Element Policy 1.2.
[4] Language incorporated from Collier County Housing Element Policy 1.3.

Policy H-1.4 Strategies, Methods, and Tools

~~Collier County shall seek to distribute affordable-workforce housing equitably throughout the county where adequate infrastructure and services are available. Programs and strategies to encourage affordable-workforce housing development may include, but are not limited to, density by right within the Immokalee Urban area and other density bonus provisions, impact fee deferrals, expedited permitting (fast tracking), public-private partnerships, providing technical assistance and intergovernmental coordination.~~ By January 14, 2015, the Department of Housing, Human and Veteran Services shall establish necessary strategies, methods and tools to support this Objective. [5]

Policy H-1.5 Annual Report to County Commissioners

On an annual basis, beginning in June 2014, the Department of Housing, Human and Veteran Services shall provide a report to the Board of County Commissioners on the status of affordable housing in each Commission District within the County.[6]

Policy H-1.~~1~~6 Proportionate Share of Affordable Housing

Collier County shall pursue interlocal agreements with the City of Naples, the City of Marco Island, and Everglades City to require that each city provide its proportionate share of affordable-workforce housing units (or the financial equivalent). Each city's proportionate share and financial equivalent will be evaluated and substantiated by the most current data, studies, and methods available to the County. ***[Moved from Housing Policy 1-1]***

Policy H-1.7 Strategies, Methods, and Tools

The County shall, with the City of Naples, work together to accomplish the community wide goal of supporting a sufficient supply of market rate and below market rate housing. This effort may include the consolidation of the City of Naples and the County housing programs and activities, including, but not limited to, state and federally funded programs such as SHIP and CDBG, in an effort to provide greater efficiency. ***[Moved from Housing Policy 1-2 and modified to incorporate language from Collier County Housing Element Policy 1.8]***

Policy H-1.8 Fair Share Affordable Housing Ordinance

The County shall, with the City of Naples, explore the development of a fair share affordable housing ordinance that shall require commercial and residential developments to address the lack of affordable housing. The local jurisdictions will evaluate a broad range of options including the development of an affordable housing impact fee, the requirement that a percentage of units developed will be "set aside" for below market rate housing, an option whereby land could be donated to a nonprofit entity and/or placed in a land bank, or other alternatives that will assist in mitigating the rising need for affordable housing as the population increases.[7] ***[Moved from Housing Policy 1-3]***

Any proposed affordable housing strategies or development incentives shall consider compatibility with established residential neighborhoods, existing land use and zoning designations, infrastructure capacity, and the City's adopted Comprehensive Plan policies. Such strategies should prioritize regional coordination and ensure that affordable housing initiatives do not adversely affect the character, stability, or existing development patterns of established neighborhoods.

[5] Language incorporated from Collier County Housing Element Policy 1.4.

[6] Language incorporated from Collier County Housing Element Policy 1.5.

[7] Language incorporated from Collier County Housing Element Policy 1.9 and currently adopted Naples Housing Policy 1.3.

Policy H-1.9 Create or Preserve Affordable Housing

The County shall create or preserve affordable housing to minimize the need for additional local services and avoid the concentration of affordable housing units only in specific areas of the jurisdiction. Programs and strategies to encourage affordable-workforce housing development may include, but are not limited to, density by right within the Immokalee Urban area and other density bonus provisions, impact fee deferrals, expedited permitting (fast tracking), public private partnerships, providing technical assistance and intergovernmental coordination. [8]

CITY POLICIES

None.

COUNTY POLICIES

*Policy H-1.~~5~~10 Inventory of Approved Affordable-Workforce Housing Units

~~Collier~~ The County shall maintain an inventory of all approved affordable ~~workforce~~ housing units within the county. The inventory shall contain the location, structure type, number of bedrooms, and target income range for each housing unit.[9]

**Included for informational purposes only pursuant to Chapter 163 F.S. Asterisked (*) policies are only adopted by the jurisdiction listed directly above the policy.*

[8] Language incorporated from Collier County Housing Element Policy 1.10.

[9] Language incorporated from Collier County Housing Element Policy 1.11.

Objective H-2 Increase Affordable Housing Units Through Public and Private Partnerships

Increase the number of affordable housing units, by the methods contained in Objective H-1 and subsequent Policies, for very-low, low, moderate and affordable workforce income residents with the assistance of for-profit and not-for-profit providers of affordable housing, within the County and its municipalities.

JOINT CITY/COUNTY POLICIES

Policy H-2.1 Nonprofit Participation in Affordable-Workforce Housing Development

Not for profit agencies~~, such as the Collier County Housing Development Corporation,~~ shall assist the County in reaching its annual affordable ~~workforce~~ housing goal by holding workshops and fairs to raise awareness and understanding of housing issues in the County; working together to purchase and develop parcels; and contributing funds towards the purchase of land for affordable ~~workforce~~ housing projects.[10]

Policy H-2.2 Public-Private Partnerships for Affordable Housing Development

Partnerships shall be encouraged between private developers, non-profit entities, local governments and other interested parties to ensure the development of housing that meets the needs of the County's very-low, low-, ~~and~~ moderate-, and affordable workforce income residents.[11]

Policy H-2.3 Technical Assistance and Information Sharing for Affordable Housing Programs

The ~~Collier~~ County shall, with the ~~and~~ City of Naples, ~~staff will~~ continue to provide community organizations with brochures and updates on various housing programs, grant opportunities, technical assistance and other information that will promote affordable ~~workforce~~ housing opportunities for very low, low-, ~~and~~ moderate-, and affordable workforce income residents.[12]

Policy H-2.4 Flexible Land Development Regulations for Mixed-Use and Diverse Housing Types

The ~~Collier~~ County shall, with ~~and~~ the City of Naples, ~~Sshall~~ continue to review existing codes and ordinances and amend them as needed to allow for flexible and innovative residential design that encourages mixed use developments ~~and~~ with a variety of housing designs, styles, and price ranges.[13]

Such flexibility shall be consistent with adopted Future Land Use policies and shall consider the compatibility of proposed development with surrounding residential neighborhoods, existing development patterns, transportation networks, and available public infrastructure and services.

[10] Language modified to incorporate Collier County Housing Element Policy 2.1.
[11] Language modified to incorporate Collier County Housing Element Policy 2.2.
[12] Language modified to incorporate Collier County Housing Element Policy 2.3.
[13] Language modified to incorporate Collier County Housing Element Policy 2.4.

Policy H-2.5 Streamlined Permit Processing for Affordable-Workforce Housing

The ~~Collier~~ County shall, with ~~and~~ the City of Naples, ~~shall~~ continue to review their existing permit processing systems in an effort to reduce the processing time and cost of affordable-workforce housing and continue to identify areas that can be streamlined.[14]

Policy H-2.6 Technical Support for Affordable Housing Funding Applications

Collier County shall continue to provide ongoing technical support and assistance to private developers and non-profit housing organizations in their efforts to secure State or Federal funding.

Policy H-2.7 Impact Fee Deferrals for Affordable-Workforce Housing Development

The ~~Collier~~ County shall increase the utilization of existing impact fee ordinances to facilitate the development of affordable~~-workforce~~ housing through the provisions of deferrals.[15]

CITY POLICIES

*Policy H-2.8 Financial and Technical Assistance for the Carver/River Park Neighborhood

Provide financial, technical and support assistance to the residents of the Carver/River Park neighborhood through continued coordination with property owners, property managers and renters.

COUNTY POLICIES

*Policy H-2.9 Affordable-Workforce Housing Density Bonus Ordinance Review

The County shall review ~~the County's~~its Affordable -workforce Housing Density Bonus Ordinance every ~~two (2~~three~~)~~ years or sooner, as necessary, and revise the Ordinance, as necessary, to reflect changing community needs and market conditions. The purpose of the Affordable-workforce Housing Density Bonus Ordinance shall be to encourage the blending of affordable~~-workforce~~ housing density bonus units into market rate developments, as well as to support developments exclusively providing affordable~~-workforce~~ housing.[16]

*Policy H-2.10 Affordable-Workforce Housing Program Administration

The ~~Collier~~ County ~~Operations Support and~~ Housing, Human and Veteran Services Department shall continue to ~~operate~~ administer affordable~~-workforce~~ housing programs, in cooperation with public and private sponsors, to provide safe, affordable-workforce housing to residents of the County's urban designated areas and rural areas. Programs ~~operated~~ administered by the Department will continue to include, but are not limited to:

- Impact fee deferrals

[14] Language modified to incorporate Collier County Housing Element Policy 2.5.
[15] Language modified to incorporate Collier County Housing Element Policy 2.7.
[16] Language modified to incorporate Collier County Housing Element Policy 2.9.

- Housing rehabilitation and emergency repairs
- Down payment and closing cost assistance
- Acquisition (exclusive of Collier County Government) and rehabilitation program[17]

~~*Policy 2.11The County Housing and Urban Improvement Department will coordinate with independent water and sewer districts to ensure that the necessary infrastructure and facilities for new housing developments are in place.~~[18]

*Policy H-2.~~12~~11 Utility Coordination and Concurrency Compliance for New Housing

The ~~Collie~~r County ~~Operations Support and Housing Department will continue to~~ in ~~coordinate~~ coordination with for-profit and not-for-profit providers of affordable housing development shall continue to coordinate with local utility providers to ensure that the necessary infrastructure and facilities for new housing developments are in place, consistent with the County's Concurrency Management System.[19]

*Policy H-2.~~13~~12 Farmworker Housing Siting and Implementation Strategies

The County will continue to adopt and implement policies which provide for the proper siting and implementation of farm worker housing, including, but not limited to, strategies such as density bonus agreements, impact fee deferrals, and the provision of adequate infrastructure and services.

**Included for informational purposes only pursuant to Chapter 163 F.S. Asterisked (*) policies are only adopted by the jurisdiction listed directly above the policy.*

[17] Language modified to incorporate Collier County Housing Element Policy 2.10.
[18] Language deleted as not included in Collier County Housing Element.
[19] Language modified to incorporate Collier County Housing Element Policy 2.11.

Objective H-3 Preserve and Protect Existing Residential Neighborhoods Through Housing Programs

Collier County shall continue to support and adequately fund housing programs to promote the preservation and protection of existing, stable residential neighborhoods. This will be accomplished through the utilization of State Housing Initiatives Partnership (SHIP) and CDBG programs, including, but not limited to, down payment/closing cost assistance, rehabilitation and emergency repair, demolition with new construction, and impact fee deferrals.

The City and County shall also recognize the importance of preserving the stability and integrity of established residential neighborhoods through appropriate land use planning, infrastructure maintenance and improvements, and development standards that encourage compatible redevelopment and reinvestment.

JOINT CITY/COUNTY POLICIES

Policy H-3.1 Federal, State, and Local Funding for Housing Rehabilitation

Collier County shall continue to seek out and utilize federal, state and local resources for housing rehabilitation programs that repair and maintain the existing housing stock. The County shall also continue to support local municipal and non- profit efforts to identify and secure funding for housing rehabilitation programs.

Policy H-3.2 Support for Affordable-Workforce Housing Funding Applications

The ~~Collier~~ County will support applications from for-profit and not- ~~f~~or-profit organizations ~~who~~ that apply for State and Federal funding for the purpose of constructing and/or rehabilitating affordable ~~workforce~~ housing.[20]

Policy H-3.3 Leveraging SHIP and Lending Resources for Home Improvements and Homeownership

The ~~Collier~~ County shall continue to utilize SHIP resources and other funds to leverage the number and amount of loans provided by local lending institutions to very low, low- ~~and~~ moderate-, and affordable workforce income residents for home improvements, rehabilitation and first-time homebuyer's assistance.[21]

CITY POLICIES

*Policy H-3.4 Planning for Local Housing Issue Identification

Through the Neighborhood Planning Process, the City will identify local housing issues and develop programs as needed to address these concerns. (See also the Future Land Use Element, Objective FLU-7 and the Concurrency and Capital Improvement Element, Action CCI-1.2.4.)

~~Policy 3.5 The City of Naples will initiate a study of the Old Naples area to determine architectural and development standards to protect and preserve the existing residential character of the area.~~ *[This policy was updated and moved to the Future Land Use Element,*

Policy FLU-6.6. It is not included in the Collier County Housing Element]

[20] Language modified to incorporate Collier County Housing Element Policy 3.2.
[21] Language modified to incorporate Collier County Housing Element Policy 3.3.

*Policy H-3.~~6~~5 Address Impacts of Larger Homes

The City of Naples will study and make recommendations to amend the Code of Ordinances to address impacts of larger homes on smaller lots within the City of Naples. These changes will be reviewed to determine their effectiveness.

*Policy H-3.~~7~~6 Housing Maintenance Code Implementation

The City of Naples will implement its housing maintenance code to address the conservation of housing stock and the preservation and protection of residential neighborhoods.

COUNTY POLICIES

*Policy H-3.~~8~~7 Maintenance of CDBG Entitlement Status

The ~~Collier~~ County ~~will~~shall continue to maintain its Community Development Block Grant (CDBG) urban entitlement county status ~~through~~ with the U.S. Department of Housing and Urban Development, which will continue to result in an annual allocation of f~~F~~ederal funding available to assist very low, low- ~~and~~ moderate-, and affordable workforce income households.[22]

**Included for informational purposes only pursuant to Chapter 163 F.S. Asterisked (*) policies are only adopted by the jurisdiction listed directly above the policy.*

Objective H-4 Reduce Substandard Housing Through Survey, Rehabilitation, and Demolition

Collier County and the City of Naples will conduct a comprehensive housing survey, every three years or sooner, for the purpose of identifying substandard dwelling units. Through continued enforcement of County housing codes, and the provision of housing rehabilitation or replacement programs, the number of substandard units (associated with a lack of plumbing and/or kitchen facilities) throughout the County shall be reduced by five percent (5%) per year through rehabilitation or demolition.

JOINT CITY/COUNTY POLICIES

Policy H-4.1 Housing Inventory Utilization for Substandard Housing Reduction

The County shall, with the City of Naples, ~~U~~utilize the most recent comprehensive housing inventory to develop and implement new programs to reduce substandard housing. Reduction of the number of substandard units will be accomplished by employing existing methods such as, but not limited to, housing code inspections, rehabilitation programs, and demolition of substandard units and their replacement with new construction.[23]

[22] Language incorporated from Collier County Housing Element Policy 3.7.

[23] Language modified to incorporate Collier County Housing Element Policy 4.1.

Policy H-4.2 Demolition of Unsafe or Irreparable Housing Units

The County shall, with the City of Naples, ~~R~~require the demolition of dilapidated, unsafe or unsanitary housing that does not meet the housing code or, which cannot economically be rehabilitated.[24]

Policy H-4.3 Relocation Policy for Displaced Residents

The County shall, with the City of Naples, ~~Review and amend the existing~~create a single uniform relocation housing policy ~~of the City of Naples and the County and create one uniform relocation housing policy~~ consistent with the U.S. Department of Housing and Urban Development requirements.[25]

Policy H-4.4 Post-Disaster Replacement Housing Standards

In the event of a natural disaster, the County shall, with the City of Naples, require that replacement housing ~~shall~~ comply with all applicable ~~F~~federal, ~~S~~state and local codes and shall consider factors such as, but not limited to, commercial accessibility, public facilities, places of employment, and housing income.[26]

Post-disaster housing recovery and redevelopment efforts should also consider long-term community resiliency, flood risk reduction, stormwater management, and the capacity of existing public infrastructure, consistent with the City's Resiliency and Coastal Management Elements.

Policy H-4.5 Minimum Housing Code Enforcement and Maintenance Standards

The County shall, with the City of Naples, ~~R~~require ~~that~~ all dwelling units ~~will~~ be maintained in a safe and sanitary condition, including adequate light, ventilation, sanitation and other provisions as required by the County and the City of Naples minimum housing codes. This task ~~may~~ will be accomplished through ~~lawful~~ housing code inspections and code enforcement actions, and housing rehabilitation programs supported through ~~S~~state, ~~F~~federal, local and/or private resources.[27]

CITY POLICIES

None.

COUNTY POLICIES

None.

[24] Language modified to incorporate Collier County Housing Element Policy 4.2.
[25] Language modified to incorporate Collier County Housing Element Policy 4.3.
[26] Language modified to incorporate Collier County Housing Element Policy 4.4.
[27] Language modified to incorporate Collier County Housing Element Policy 4.5

Objective H-5 Monitor and Support the Conservation of Historically Significant Homes

Collier County and the City of Naples will annually monitor all identified Historically-significant homes to determine if these structures are being conserved, maintained and/or rehabilitated.(See also Future Land Use Element, Objective FLU-6.)

JOINT CITY/COUNTY POLICIES

Policy H-5.1 Preservation of National Register and Locally Designated Historic Residential Structures

All residential structures that are listed on the National Register of Historic Places, or as contributing structures within the Old Naples National Register Historic District, or which are designated as locally significant historic resources, will be encouraged to maintain their historic value through the provision of technical assistance.

Policy H-5.2 Review Regulations and Codes

The ~~Collier~~ County shall, ~~and~~ with the City of Naples, ~~will~~ review their land development regulations, building code, FEMA regulations, and other requirements every five years, and amend these as necessary to encourage the conservation, maintenance and rehabilitation of historically significant structures.[28]

CITY POLICIES

*Policy H-5.3 Implementation of Historic Resource Designation Criteria

The City will implement Objective 6 and all associated policies in the Future Land Use Element as they pertain to historically significant structures, including the criteria for designation of locally historic resources.

*Policy H-5.4 Incentives for Historic Home Conservation and Rehabilitation

By 2019, Collier County and the City of Naples, will study potential incentives to encourage the conservation, maintenance and rehabilitation of historic homes and will make recommendations to the City Council and to the Board of County Commissioners as to which incentives should be adopted.

COUNTY POLICIES

*Policy H-5.5 Incentives for Historic Home Conservation and Rehabilitation

The conservation and rehabilitation of housing which is of historic significance shall be accomplished by working with private sector groups and private developers to develop incentive-based programs.

*Policy H-5.6 Countywide Historical Survey and National Register Evaluation

[28] Language modified to incorporate Collier County Housing Element Policy 5.2.

By ~~2008~~2018, the Board of County Commissioners shall commission a new Historical Survey for all of unincorporated Collier County. The Survey shall review the current status of all previously identified historical structures and sites within the unincorporated County and shall make recommendations as to which of these sites or structures should be nominated to the National Register. The Survey shall also review and make similar recommendations regarding any previously unidentified historic structures or sites.[29]

*Policy H-5.7 Historic Preservation Ordinance Revisions

By ~~2009~~2019, the Historical/Archaeological Preservation Ordinance shall be updated to include the results of the Historical Survey and to include any relevant changes in State or Federal regulations concerning historical properties.[30]

**Included for informational purposes only pursuant to Chapter 163 F.S. Asterisked (*) policies are only adopted by the jurisdiction listed directly above the policy.*



Objective H-6 Monitor and Amend Regulations to Ensure Compliance for Group Care Facilities

Collier County shall monitor changes to state and federal regulations pertaining to group care facilities, and, as necessary, amend its Land Development Code to ensure compliance.

JOINT CITY/COUNTY POLICIES

Policy H-6.1 Housing Resource Support for Special-Needs Providers

The County shall, with the City of Naples, ~~P~~provide non-profit group ~~care facility~~housing and Continuing Care Retirement Center organizations with information on ~~Federal~~federal, ~~State~~ state and local housing resources that will assist them in the provision of special needs housing. On an annual basis, or as needed, provide technical assistance and support as organizations apply for funding assistance.[31]

Policy H-6.2 Interjurisdictional Fair Housing Coordination for Group Care Facilities

The ~~Collier~~ County shall, with the City of Naples, review the County and ~~the~~ City's ~~of Naples~~ Fair Housing ordinances and procedures with regard to group ~~care facilities~~housing and Continuing Care Retirement Centers and shall seek to consolidate local fair housing implementation in order to promote consistency and coordination in the siting of such facilities between the jurisdictions.[32]

[29] Language modified to incorporate Collier County Housing Element Policy 5.6.
[30] Language modified to incorporate Collier County Housing Element Policy 5.7.
[31] Language modified to incorporate Collier County Housing Element Policy 6.1
[32] Language modified to incorporate Collier County Housing Element Policy 6.2.

Policy H-6.3 Land Development and Building Code Compliance for Group Care Facilities

The County shall, with the City of Naples, ~~R~~review their respective ~~existing County and City of Naples~~ land development regulations and building codes, and amend as necessary, to ensure compliance with State and Federal regulations to provide for group ~~homes~~ housing and Continuing Care Retirement Centers, and foster care facilities licensed by the State of Florida.[33]

Policy H-6.4 Residential Zoning Provisions for Groups and Foster Care Facilities

The County shall, with the City of Naples, allow ~~G~~group ~~homes~~ housing and Continuing Care Retirement Centers ~~and foster care facilities will be allowed~~ in residentially zoned neighborhoods where adequate infrastructure, services and resources are available. ~~Collier County may allow group care facilities in residentially zoned neighborhoods where adequate infrastructure, services and resources are available.~~The location of these facilities will be in compliance with local land use regulations and will be consistent with Chapter 419, Florida~~.~~ Statutes.[34]

CITY POLICIES

None.

COUNTY POLICIES

None.

Objective H-7 Restrict Mobile Home Development in Hazard Prone Coastal Areas



Although mobile home developments currently exist within the coastal areas of Collier County, as a result of the coastal community's susceptibility to flooding and storm surges, no new rezone to permit mobile home development will be allowed within the Coastal High Hazard Area, as depicted on the countywide Future Land Use Map.

JOINT CITY/COUNTY POLICIES

None.

CITY POLICIES

*Policy H-7.1 Recognition of Existing Mobile Home Park

The City formally recognized the existence of one mobile home park in the City limits through a Planned Development rezone process. This rezone process recognized that the Naples Mobile

[33] Language modified to incorporate Collier County Housing Element Policy 6.3.

[34] Language modified to incorporate Collier County Housing Element Policy 6.4.

Home Park does provide affordable housing opportunities to those living in the 141 mobile homes and 31 recreational vehicle spaces within this complex.

*Policy H-7.2 Mobile Home Development Restrictions in Hazard Areas

Except as may be required by state law, additional mobile home developments will not be permitted in the City limits due to the City's low elevation, susceptibility to flooding, storm surges and high winds in hurricane and tropical storms and that mobile homes are particularly vulnerable to damage.

COUNTY POLICIES

*Policy H-7.3 Mobile Home Zoning Limitations in the Coastal High Hazard Area

The County has numerous sites where mobile homes are a permitted use and these sites will continue to be available for mobile home development. However, due to the low-lying elevations, susceptibility to flooding, storm surges and high winds from hurricanes and tropical storms, and ~~the fact~~ that mobile homes are particularly vulnerable to damage, no additional sites will be zoned for mobile home development within the Coastal High Hazard Area, as depicted on the countywide Future Land Use Map.[35]

**Included for informational purposes only pursuant to Chapter 163 F.S. Asterisked (*) policies are only adopted by the jurisdiction listed directly above the policy.*

[35] Language modified to incorporate Collier County Housing Element Policy 7.3.

Objective H-8 Utilize Funding and Partnerships to Provide Affordable Housing

Collier County shall continue to utilize SHIP, CDBG, or other funding sources and, in partnership with Federal, State and non-profit housing agencies, will seek to provide a minimum of 50 rehabilitated or new residential units per year for very low, low and moderate income residents of the Immokalee Urban Area, Rural Fringe Mixed Use District, and within the Rural Lands Stewardship Area. Families benefiting from such housing will include, but not be limited to, farmworkers and other populations with special housing needs.

JOINT CITY/COUNTY POLICIES

None.

COUNTY POLICIES

*Policy H-8.1 Rehabilitation or Removal of Substandard Housing Units

The ~~Collier~~ County shall continue to ~~pursue the policy of requiring all non-conforming or~~identify sub-standard residences of any type, within the Immokalee Urban Area and require that those residences ~~to~~ be ~~either~~ rehabilitated to current housing code standards or demolished.[36]

*Policy H-8.2 Target Programs to Correct Deficiencies in Immokalee Urban Area

The County shall continue to target affordable housing and code enforcement programs to correct deficiencies identified in the 2004 Immokalee Urban Area housing assessment survey.[37] ~~By 2008, Collier County shall complete a review of the residential density caps established within the Immokalee Area Master Plan Element of this Growth Management Plan. Based upon this review, the County shall determine if and where it may be appropriate to increase such caps, so as to encourage the development of new affordable workforce housing units for farmworkers, very low, low- and moderate-income residents.~~[38]

*Policy H-8.3 Leveraging Funding Sources

Funding for rehabilitation of both owner and rental units shall be provided through USDA funding, State SHIP funding, CDBG funding, or other appropriate funding sources, and leveraged with additional funding sources to the maximum degree possible. ***[Moved from Policy 8.3 as rewritten in Collier County Housing Element]*** ~~During 2004, the County completed a housing assessment survey of single family, multi-family, and mobile home units and mobile home parks in the Immokalee Urban Area, in order to determine the number of units that do not meet the County's current health, safety and minimum housing codes. The County shall target affordable workforce housing and code enforcement programs to correct the conditions.~~[39]

[36] Language modified to incorporate Collier County Housing Element Policy 8.1.

[37] Language modified to incorporate Collier County Housing Element Policy 8.2.

[38] Not included in Collier County Housing Element.

[39] Not included in Collier County Housing Element.

*Policy H-8.4 Funding for Rehabilitation of Owner and Rental Housing Units

Proposed farmworker housing sites will be evaluated and selected on the basis of health, safety and welfare concerns and to ensure that housing for this group is located in close proximity to employment locations, transportation opportunities, shopping opportunities, and health care facilities.[40] ~~Funding for rehabilitation of both owner and rental units within the Immokalee Urban and Rural Lands Stewardship Areas will be provided through USDA funding, State SHIP funding, CDBG funding, or other appropriate funding sources, and leveraged with additional funding sources to the maximum degree possible.~~ ***[Moved to Policy H-8.3]***

*Policy H-8.5 Use of CDBG Funding for Farmworker Housing Opportunities

The County shall utilize CDBG funds to provide farmworker-housing opportunities, including special consideration aimed at those units that current SHIP program guidelines prohibit from assistance.[41]

~~Proposed farmworker housing sites will be evaluated and selected on the basis of health, safety and welfare concerns and to ensure that housing for this group is located in close proximity to employment locations, transportation opportunities, shopping opportunities, and health care facilities.~~[42]

~~Policy 8.6 Collier County will continue to utilize CDBG funds to provide farmworker housing opportunities. In addition to housing units that currently qualify for assistance under SHIP program guidelines, special consideration of CDBG funds will be aimed at units that current SHIP program guidelines prohibit from assistance (i.e., mobile home units). Farmworkers will also be encouraged, through the use of multi-lingual outreach programs, to take advantage of any other CDBG, SHIP, Local, State, Federal and private programs for which they may qualify.~~[43]

CITY POLICIES

None.

**Included for informational purposes only pursuant to Chapter 163 F.S. Asterisked (*) policies are only adopted by the jurisdiction listed directly above the policy.*

[40] Language modified to incorporate Collier County Housing Element Policy 8.4.
[41] Language modified to incorporate Collier County Housing Element Policy 8.5.
[42] Not included in Collier County Housing Element.
[43] Not included in Collier County Housing Element.

Objective H-9 Promote Energy Efficiency and Renewable Energy in New Housing

The City and Collier County shall promote energy efficiency in the design and construction of new housing and encourage the use of renewable energy resources.

JOINT CITY/COUNTY POLICIES

None.

CITY POLICIES

None.

COUNTY POLICIES

*Policy H-9.1 Promote Energy Efficient Housing

The County shall encourage the construction of energy efficient housing by exploring innovative regulations that promote energy conserving and environmentally sensitive technologies and design.[44] ~~The City and County shall maintain mixed use land use and zoning that reduces trip lengths, number of trips, time of travel and promotes pedestrian activity.~~[45]

*Policy H-9.2 Educate Public About Benefits of Resource Efficient Designs

The County shall educate the public about the economic and environmental benefits of resource efficient design and construction.[46] ~~Promote intermodal facilities to provide both travel options and more efficient travel by insuring that transit stops and pedestrian connections are addressed in the development review process.~~[47]

*Policy H-9.3 Expedite Review of Energy Efficient Projects

The County shall expedite plan review of housing projects that promote energy conservation and design.[48] ~~Support walkable community initiatives by insuring that on-site and off-site pedestrian connections are addressed in the development review process.~~[49]

*Policy H-9.4 Encourage Mixed Housing Types Near Employment Centers

The County shall continue to encourage the development of mixed housing types near employment centers in order to reduce Green House Gas emissions and minimize carbon footprints.[50] ~~Amend the land development regulations as necessary to accommodate~~

[44] Language modified to incorporate Collier County Housing Element Policy 9.1
[45] Not included in Collier County Housing Element
[46] Language modified to incorporate Collier County Housing Element Policy 9.2
[47] Not included in Collier County Housing Element
[48] Language modified to incorporate Collier County Housing Element Policy 9.3.
[49] Not included in Collier County Housing Element
[50] Language modified to incorporate Collier County Housing Element Policy 9.4.

~~new energy producing technology such as roof mounted solar panels and wind turbines.~~[51]

*Policy H-9.5 Promote Energy Star Building and Appliances Programs

The County shall promote the incorporation of US EPA Energy Star Building and Appliances programs into construction and rehabilitation practices.[52] ~~Provide an expedited review process for LEED certified plans.~~[53]

Included for informational purposes only pursuant to Chapter 163 F.S. Asterisked (*) policies are only adopted by the jurisdiction listed directly above the policy

[51] Not included in Collier County Housing Element

[52] Language modified to incorporate Collier County Housing Element Policy 9.5.

[53] Not included in Collier County Housing Element



5

CONSERVATION AND COASTAL MANAGEMENT ELEMENT

In this Section:

Introduction

Goal, Objectives, Policies, and Actions

INTRODUCTION

The purpose of the Conservation and Coastal Management Element is to provide direction for protection, preservation and enhancements of the City's natural and coastal resources which are vital for the community's long-term economic, environmental, social and aesthetic values.

The goal~~s~~, objectives and policies of this element have been prepared pursuant to 163.3177(6)(d), F.S., 163.3177(6)(g), F.S., and 163.3178, F.S., and based on studies, surveys and data as required.

The Conservation aspects of this Element will address the conservation, use and protection of natural resources including:

- Air;
- Water and water recharge areas;
- Wetlands and f~~F~~loodplains;
- Rivers, bays, lakes, and harbors;
- Soils and minerals;
- Marine habitats and fisheries;
- Forests and wildlife; and
- Natural and environmental resources.

The Coastal Management aspects of this Element will implement the following ~~objective~~statutory requirements:

1. Maintain, restore and enhance the overall quality of the coastal environment, including but not limited to, its amenities and aesthetic values.
2. Preserve the continued existence of viable populations of all species of wildlife and marine life.
3. Protect the orderly and balanced utilization and preservation, consistent with sound conservation principles, of all living and nonliving coastal resources.
4. Avoidance of irreversible and irretrievable loss of coastal resources.
5. Use ecological planning principles and assumptions in the determination of the suitability of permitted development.
6. Limit public expenditures that subsidize development in coastal high hazard areas.
7. Protect human life against the effects of natural disasters.
8. Preserve historic and archaeological resources which include the sensitive adaptive use of these resources.
9. Develop an adaptation strategy for low-lying areas that are subject to flooding due to extreme high tides and storm surge and are vulnerable to the impacts of rising sea level.

GOAL, OBJECTIVES, ~~AND~~ POLICIES, AND ACTIONS

The following goal, objectives and policies address the management and utilization of the natural resources of the City's coastal environment. This goal, and these objectives and policies are intended to be consistent with those proposed or adopted by Collier County, the Southwest Florida Regional Planning Council, and the State of Florida to ensure that the City's planning efforts will be compatible with their various plans.

Unless otherwise stated, the objectives in this element will be implemented within the ~~ten~~ twenty-year Comprehensive Plan time frame.

GOAL

Conserve, protect, and restore or enhance the City's natural and coastal resources, including wetland and upland ecosystems, to maintain and enhance native habitats, floral and faunal species diversity, water quality, and natural surface water characteristics. Restrict development activities that damage or destroy coastal resources. [1] ~~P~~Permit non-destructive uses of coastal natural resources only upon consideration of ecological, resiliency, historical, cultural, and aesthetic factors, as well as the protection of human life and the limitation of public expenditures in areas subject to destruction by natural disasters.

The objectives designed to meet these goals are stated under the following sections:

- Objective 1: Water Quality;
- Objective 2: Natural Resource Protection;
- Objective 3: Water-Related Activities;
- Objective 4: Minimizing Development Impacts;
- Objective 5: Coastal High Hazard Areas;
- Objective 6: ~~Real Property Protection~~Perils of Flood; and
- Objective 7: Natural Disaster Planning~~; and~~.
- ~~Objective 8: Climate Adaptation and Resiliency.~~

[1] Added to address PAB Notes and AECOM policy recommendation.

Objective CCM-1 Water Quality

The City will address ~~point and non-point source pollution~~ specific discharge locations and runoff and the effects on water quality through ongoing monitoring, regulation, watershed protection, stormwater management, and public education efforts that are at least as stringent as federal and state requirements.

Policy CCM-1.~~2~~1 ~~Implementation of~~ Water Quality Enforcement and Monitoring

The City shall ~~R~~reduce point source and non-point source ~~stormwater~~ discharges to estuarine and Gulf waters and improve ~~stormwater~~ the quality of receiving water bodies ~~quality~~ through implementation of the Stormwater Master Plan, the City's NPDES MS4 permit and best management practices such as the creation of ~~filter marshes, and vegetated swales,~~low impact development and living shorelines. The City shall also partner with responsible agencies on water quality issues by providing data and information to support enforcement of state water quality standards, including, but not limited to, Total Maximum Daily Loads.

The City shall prioritize the evaluation, maintenance, and improvement of aging stormwater infrastructure, including drainage conveyance systems, outfalls, and stormwater retention facilities, to improve water quality, reduce localized flooding, and enhance the long-term effectiveness of the City's stormwater management system. Prioritization should consider documented infrastructure deficiencies, recurring flooding conditions, environmental impacts, and opportunities for coordinated improvements with Collier County and other regional partners.

> ~~Policy 1.1~~ **Action CCM-1.1.1** ~~Coordinate~~ Continue to conduct ~~implementation of a~~ statistically valid water quality monitoring programs for both estuarine and non-tidal surface waters.

Policy CCM-1.~~3~~2 Marinas and Marine Facilities Best Management Practices

Encourage marine facilities, e.g., marinas and boat storage/maintenance facilities, to use environmental Best Management Practices to reduce or eliminate pollutant discharge to waterbodies.

Policy CCM-1.3 Environmental Best Management Practices

Encourage development, redevelopment and project proposals to reduce the effects of existing drainage systems and the impact of point source and non-point source pollution on estuarine water quality and consistent with the plans and principles, including existing state and regional regulatory programs, that are used to maintain or improve water quality while maintaining sufficient quantities of water flow.[2]

> ~~Policy 1.7~~ **Action CCM-1.3.1** Support public education, awareness, and participation programs on water conservation, shoreline and waterways cleanup, and the proper use, storage, and disposal of household chemicals, including pesticides and fertilizers.

[Moved from CCME Policy 1-7]

> ~~**Policy 1.8**~~ **Action CCM-1.3.2** Coordinate with and support efforts of Collier County and South Florida Water Management District to implement the Surface Water Improvement Management (SWIM) plan for Naples Bay. This includes redirecting and reducing fresh

[2] Added to address PAB Notes and AECOM policy recommendation.

> water discharge from the Golden Gate Canal into Naples Bay; which will help restore historical sheet flow paths, improve water quality, restore habitat and facilitate a more natural salinity regime in Naples Bay. It is also expected to reduce pollutant loadings (e.g., nutrients, turbidity) into Naples Bay. ***[Moved from CCME Policy 1-8]***

Policy CCM-1.4 Wellfield Protection Coordination and Enforcement

Coordinate with Collier County to enforce the County-wide wellfield protection ordinance that provides for the protection of health, life, resources and property through regulation of hazardous substances, sewage disposal, well construction, stormwater management, earth mining, solid waste and other related aspects of land use and development in the vicinity of public water supply wells.

Policy CCM-1.5 Urban Landscaping Best Management Practices

Promote best management practices and enforce City regulations related to urban landscaping, to minimize pollution by nutrients, grass clippings and other contaminants to non-tidal and coastal waterbodies, while maintaining Naples' green jewel character.

~~Policy 1.6~~

~~Promote the use of environmentally-friendly alternatives to chemical pesticides and algaecides through public education and outreach.~~

~~Policy 1.7~~

~~Support public education, awareness, and participation programs on water conservation, shoreline and waterways cleanup, and the proper use, storage, and disposal of household chemicals, including pesticides and fertilizers.~~ ***[Moved to Action CCM-1.3.1]***

~~Policy 1.8~~

~~Coordinate with and support efforts of Collier County and South Florida Water Management District to implement the Surface Water Improvement Management (SWIM) plan for Naples Bay. This includes redirecting and reducing fresh water discharge from the Golden Gate Canal into Naples Bay; which will help restore historical sheet flow paths, improve water quality, restore habitat and facilitate a more natural salinity regime in Naples Bay. It is also expected to reduce pollutant loadings (e.g. nutrients, turbidity) into Naples Bay.~~ ***[Moved to Action CCM-1.3.2]***

Policy CCM-1.~~9~~6 Coordinate to Control Nutrient Discharge

Cooperate with the Department of Environmental Protection and the Collier County Pollution Control Department to control the discharge of oxygen-demanding nutrients, petroleum hydrocarbons, and other toxic or hazardous substances into coastal waters.

Objective CCM-2 Natural Resource Protection



The City recognizes the vital importance of its natural resources to its green jewel character, wellbeing, economy and healthy environment, and will protect them through resource management practices and by regulating coastal construction development. The City will protect the orderly and balanced utilization and preservation, consistent with sound conservation principles, of all living and nonliving coastal zone resources.

Policy CCM-2.1 Coastal Area Preservation

Avoid irreversible and irretrievable loss of coastal zone resources. Preserve and restore native dune vegetation which stabilizes dunes and provides a barrier against storm impacts, and by construction of additional vegetated dunes, where feasible.

Policy CCM-2.2 Development of Beachfront Properties

Development of beachfront properties will require dune restoration and stabilization best practices consistent with the Code of Ordinances.

~~**Policy 2-3** Ensure that construction activities seaward of the coastal construction control line are consistent with the state regulations and the Florida Building Code.~~ ***[Moved to Policy CCM-6.5]***

Policy CCM-2.43 Supporting Ongoing Beach Protection and Renourishment

~~Coordinate with Collier County beach restoration and renourishment efforts and support~~ Support ongoing protection and enhancement of the beach and dune systems. Continue beach renourishment and expansion of dune revegetation projects in collaboration with Collier County and any other necessary agencies to strengthen resilience of the City's dune system.

The City shall work collaboratively with Collier County, state and federal agencies, and affected coastal communities to identify and address regulatory, logistical, and funding barriers that may prevent eligible shoreline areas from participating in regional beach nourishment and restoration programs. Such efforts should seek comprehensive and coordinated shoreline protection throughout the City, recognizing the importance of beaches and dune systems to public safety, environmental protection, and long-term coastal resiliency.

Policy CCM-2.~~5~~4 Prevent Deterioration of the Beach/Dune System

Prohibit public or private activities that would increase erosion beyond the natural beach erosion/accretion cycle or that would otherwise deteriorate the beach/dune system.

Policy CCM-2.~~6~~5 Healthy Maintenance of Beaches

Limit beach raking and maintenance in order to minimize detrimental impacts upon native flora and fauna, including nesting sea turtles and the function of the beach and dune system.

Policy CCM-2.~~7~~6 Motorized Vehicles on Beaches

Prohibit motorized vehicles on beaches and dunes except for the following:

1. Emergency vehicles; and
2. Vehicles associated with beach nourishment, environmental maintenance,

environmental monitoring, or conservation purposes.

Policy CCM-2.~~8~~7 Protect Marine Turtle Nesting Habitat

Protect marine turtle nesting habitat ~~by~~ through education, beach lighting ordinance enforcement, and review of exterior lighting and landscape lighting plans for properties seaward of the Coastal Construction Control Line or visible from the beach.

Policy CCM-2.~~9~~8 Collaborate with the Collier County Sea Turtle Program

Collaborate with the Collier County Sea Turtle Program to provide sea turtle protection, monitoring, and enforcement of sea turtle protection regulations.

Policy CCM-2.~~10~~9 Protect and Restore Marine Habitat

Protect and restore seagrass beds, oyster reefs, mangroves, and shallow benthic habitat.

Policy CCM-2.~~11~~10 Oppose Offshore Petroleum

Oppose any exploration or production of offshore petroleum resources in ~~the~~ Gulf waters ~~of Mexico~~.

Policy CCM-2.~~12~~11 Coordination with Local and Regional Agencies

Coordinate with local and regional agencies regarding Doctors Pass and Gordon Pass inlet management.

Policy CCM-2.~~13~~12 Review Proposed Projects Affecting Surface and Groundwater Flow

Review and recommend proposed projects that could change surface and groundwater flow patterns in basins tributary to Naples Bay, Gordon River, the Clam Bay and Moorings Bay systems, and ~~the~~ Gulf waters ~~of Mexico~~ to improve water quality discharge.

Policy CCM-2.~~14~~13 Interagency Coordination for Natural Resource Protection

Coordinate with Collier County, Rookery Bay National Estuarine Research Reserve, and South Florida Water Management District to conserve, manage, and protect natural areas and resources.

Policy CCM-2.~~15~~14 Potable Water and Groundwater Recharge Area Conservation

Participate in the planning and implementation of routine and emergency conservation measures for potable water resources and groundwater recharge areas, in cooperation with the South Florida Water Management District.

Policy CCM-2.~~16~~15 Manatee Protection

Promote manatee protection through public education and enforcement of manatee protection speed zones.

Policy CCM-2.~~17~~16 Native Trees and Vegetation Protection

Protect and encourage the planting of appropriate native trees and vegetation.

Policy CCM-2.~~18~~17 Maintain the City of Naples as Bird Sanctuary

Maintain the City as a bird sanctuary (established in 1957), in which all native avifauna, including migratory species, are protected.



Objective CCM-3 Water-Related Activities

~~Waterfront properties will be designed to promote water-related and water-dependent activities, encourage the retention and development of marine service facilities, and public access to beaches and bays, while maximizing natural resource protection.~~Protect, maintain, restore, and enhance the overall quality of the coastal zone environment, including, but not limited to, its amenities and aesthetic values.[3]

Policy CCM-3.1 Waterfront Properties and Shoreline Development

Development of all waterfront properties and along all shorelines will be designed to protect the natural and manmade resources within the City through means that protect and enhance environmental benefits to the maximum extent practicable.

Policy CCM-3.2 Minimum Water Standards

Require, at a minimum, standards for armoring, marina siting, construction of groins, seawalls, living shorelines and other erosion control structures, public access, pier and dock construction, and dredge and fill activities.

Policy CCM-3.~~4~~3[4] Opportunities for Recreation

Provide and improve opportunities for recreation and aesthetic enjoyment of coastal resources.

> ~~**Policy 3.5**~~ **Action CCM-3.3.1** Storage rack locations for kayaks and canoes will be evaluated to ensure no impacts occur to the beach and dune system.~~Evaluate the level of intensity and location for storage racks for kayaks, canoes and small sailboats~~.

Policy CCM-3.~~6~~4 Encourage Additional Public Beach Access and Parking in County

Encourage Collier County to acquire additional public beach access and parking facilities in the unincorporated areas of the County.

Policy CCM-3.~~7~~5 Artificial Reefs

Cooperate with the Collier County artificial reef installation and maintenance program to create additional marine habitat for the enjoyment of ~~fishermen~~ anglers and divers.

Policy CCM-3.~~8~~6 Board Storage and Access

Encourage Collier County to provide additional boat storage and points of access to coastal waters in areas outside of Naples Bay.

~~**Policy 3.9** Participate in the Gordon River Greenway planning process to promote education and recreation of the Gordon River environment.~~

[3] Updated based on AECOM and PAB recommendations.

[4] Note: Current adopted comprehensive plan was misnumbered; this numbering corrects that issue from Policy 3.3 forward.

Policy CCM-3.~~10~~7 Maintain Coastal Economy

Maintain and enhance the City's traditional coastal economy in the areas of boating, fishing and tourism.

Objective CCM-4 Minimizing Development Impacts~~.~~



The City will maintain development standards which identify permitted activities and require minimization of environmental impacts, mitigation for unavoidable impacts and habitat restoration. Development proposals in conservation areas and environmentally sensitive habitat will minimize impacts and protect, restore, and enhance these areas.

Policy CCM-4.1 Protect Natural Resources from Development

Conservation Areas and environmentally sensitive habitat and native vegetative communities ~~as identified on the Natural Resources Map,~~ will be protected from development that would diminish their environmental functions or significance, while allowing natural uses and passive, low intensity recreational uses.

Policy CCM-4.2 Standards for Exotic Vegetation and Open Space Ratios

City regulations will contain, at a minimum, standards that require the removal of exotic vegetation and require open space ratios for clearing based on the individual habitat types.

Policy CCM-4.3 Continue Protective Measures for Trees

Continue to implement and maintain protective measures for cypress trees, the sand pine and dwarf oak scrub community and other native trees to enhance Naples' green jewel character.

Policy CCM-4.4 Monitor and Protect Marine Habitats

Monitor and protect seagrass beds, oyster reefs, mangroves, ~~and~~ shallow benthic habitat, and other submerged resources from damage caused by direct development impacts such as dredge and fill operations and propeller scarring, and by indirect impacts such as increased turbidity and pollution.

Policy CCM-4.5 Installation of Riprap and Habitat Restoration

Encourage installation of riprap along privately-owned vertical seawalls or bulkheads. Encourage and facilitate restoration of eroded areas, where such efforts will improve natural habitat and increase resiliency against natural disasters and ~~climate change~~flooding.

Policy CCM-4.6 Protect Florida's Imperiled Species

Protect Florida's Imperiled Species (as designated by the Florida Fish and Wildlife Conservation Commission) and their habitats. The City will require an analysis of the potential adverse impacts on Florida's Imperiled Species and their habitat for all proposed development on any environmentally sensitive lands.

Policy CCM-4.7 Implement the Naples Land Conservation Program

Implement the Naples Land Conservation Program using the Naples Land Conservation Trust Fund to acquire lands for conservation, preservation, restoration and maintenance of vital and significant resources and their biodiversity.

Policy CCM-4.8 Improve Air Quality

Implement programs and initiatives that help improve air quality and encourage multi-modal transportation and mixed-use development where appropriate.

Policy CCM-4.9 Prevent Air, Soil, and Water Pollution in Development

Review proposed development to ensure implementation of environmental Best Management Practices and encourage Low-Impact Development (LID) strategies to prevent air, soil and water pollution.

Policy CCM-4.10 Require Environmental Impact Assessments and Mitigation Plans

Development proposed to take place within Conservation Areas will be required to provide an approved Development of Significant Environmental Impact Assessment and a mitigation plan prior to any development.

Policy CCM-4.11 Limit Infrastructure Development in Coastal Areas

Limit development of infrastructure in coastal areas to protect natural resources. If negative impacts are unavoidable, these impacts will be mitigated in compliance with Policy CCM-4.12 of this element. (See also Objective R-2 in the Resiliency Element.)

Policy CCM-4.12 Preserve Existing Natural Resources through Mitigation

Mitigation plans for proposed development must maximize the preservation of existing natural resources. In determining mitigation procedures, the following methods will be employed; they are listed in the order of priority in which they should be utilized:

1. Avoid the impact altogether by not taking a certain action or parts of an action.
2. Minimize impacts by limiting the degree or magnitude of the actions or their implementation.
3. Rectify the impact by repairing, rehabilitating or restoring the affected environment.
4. Reduce or eliminate the impact over time by preservation and maintenance operations during the life of the action.
5. Compensate for the impact by replacing or providing substitute resources or environments within the same watershed or receiving waters.
6. Compensate for the impact by replacing or providing substitute resources or environments within an adjacent watershed or receiving waters.

Objective CCM-5 Coastal High- Hazard Areas.

The Coastal High-Hazard Area (CHHA) is the area below the elevation of the Category 1 Storm Surge line as established by a Sea, Lake and Overland Surges from Hurricanes (SLOSH) computerized storm surge model. The City will designate Coastal High- Hazard Areas on the Future Land Use Map (FLUM); and ensure development and zoning changes do not promote increased population within Coastal High-Hazard Areas. (See also Policy FLU-3.3 in the Future Land Use Element.)

Policy CCM-5.1 Preserve Undeveloped Coastal Areas

Encourage undeveloped land to be used for preservation of coastal natural areas.

Policy CCM-5.2 Direct Growth Away from Coastal High Hazard Areas

Direct new population growth away from known or predicted coastal high hazard areas except:

1. Mmixed use projects which further economic development and revitalization efforts in the Downtown Mixed Use and Limited Commercial designations; and
2. Rresidential development in compliance with the Future Land Use Map and as further limited by the City regulations.

NOTE: Implementation of this policy shall recognize the distinction between new development that increases population density within Coastal High Hazard Areas and the lawful redevelopment, rehabilitation, or reconstruction of existing properties consistent with adopted land use and zoning regulations.

The City shall balance coastal hazard mitigation objectives with the protection of established residential neighborhoods and private property rights, consistent with applicable state and federal requirements.

Policy CCM-5.3 Limiting Public Expenditures that Subsidize Development

The City shall limit public expenditures that subsidize development in coastal high-hazard areas.

~~**Policy 5.3** Public expenditures that subsidize new or expanded infrastructure in the CHHA will only be permitted to service density levels as determined by the FLUM and permitted by the City regulations.~~

Policy CCM-5.4 Future Flood Risk

Regulate all development including infrastructure in the CHHA to account for current and future flood risk to the extent practicable.

Policy CCM-5.5 Development in Coastal High Hazard Areas

Development in the CHHA will be reviewed for significant impacts upon evacuation routes and will require any roadway improvements deemed

necessary.

Policy CCM-5.6 Public Facilities in Coastal High Hazard Areas

Prior to the development of new public facilities in the CHHA, it must be determined that no other feasible sites exist outside that area or areas identified as vulnerable to flood risk within the useful life of that infrastructure. Where public facilities are proposed for adaptation, renovation or expansion, relocation must be considered, if feasible, prior to project approval. If construction of public facilities in the CHHA occurs, all facilities must be ~~floodproof~~hardened~~ed~~ to minimize damage that may result from current and future high tide events, storm surge, ~~flash floods,~~ stormwater runoff, and the related impacts of sea level rise.

Objective CCM-6 ~~Real Property Protection.~~Perils of Flood

The City will work to reduce natural hazard impacts, including but not limited to flooding from stormwater runoff, storm surge, sea level rise, and/or high tide events~~, to real property~~.

Policy CCM-6.1 New Buildings and Structures

Continue to ensure that all new buildings and structures meet, or exceed, the flood-resistant requirements of the Florida Building Code and 44 CFR part 60 federal floodplain management regulations.

Policy CCM-6.2 Address Current and Future Flood Risk

Address current and future flood risk based on updated Flood Insurance Rate Maps, updated Flood Insurance Studies, updated Stormwater Master Plans, Vulnerability Assessments, Adaptation Plans, and other ~~and Sea Level Rise~~ studies as the data becomes available.

Policy CCM-6.3 Flood Prevention Best Management Practices

Promote the use of best management practices and engineering solutions for flood prevention and stormwater management through City regulations, Department of Environmental Protection and South Florida Water Management District that will result in the removal of real property from flood zone designations established by the Federal Emergency Management Agency such as but not limited to:

- Reconstruction in compliance with current building and construction standards;
- Public acquisition; or
- Reduction in intensity of use.

Policy CCM-6.4 Development and Redevelopment Techniques

Ensure that development and redevelopment include site development techniques that reduce the losses due to flooding and claims made under flood insurance policies from current and future flood risk. These regulations will include structural and non-structural site development techniques such as but not limited to, maintaining adequate levels of service for stormwater management that include consideration of tidal flooding constraints, grading or use of materials to withstand inundation, minimizing flood damage to structures through flood-proofing and ~~siting~~ designing public facilities ~~utilities and infrastructure~~ to account for predicted flood conditions for the useful life of that project. Development and redevelopment standards should seek to prevent adverse off-site drainage impacts and should be coordinated with planned improvements to public stormwater infrastructure.

~~**Policy 6.5** Participate in the National Flood Insurance Program (NFIP) and the Community Rating System (CRS), and strive to improve its score resulting in reductions in flood risk and insurance premiums for residents~~ ***[Moved to Action CCM-7.5.1]***

> ~~Policy 6.6~~Action CCM-6.4.1 Provide public outreach and education to the community on the importance and benefits of mitigating flood risks through land use regulations, building construction codes, flood elevation requirements and stormwater management.

Policy CCM-~~2.3~~6.5 Coastal Construction

Ensure that construction activities seaward of the coastal construction control line are consistent with the state regulations and the Florida Building Code. ***[Moved from CCME Policy 2-3]***

Objective CCM-7 Natural Disaster Planning~~.~~



The City will work to lessen the impacts of natural disasters on human life, property, public facilities, and natural resources through emergency management, natural disaster planning and hazard mitigation based on regional models and County/City planning efforts.

Policy CCM- 7.1 Coordinate Hurricane Evacuation Policy

Coordinate land uses and the City hurricane evacuation policy with other relevant local and regional plans and policies, including regional hurricane evacuation studies.

Policy CCM-7.2 Education of Disaster Preparedness

Promote public education of disaster preparedness and hurricane evacuation through neighborhood and condominium associations. Coordinate with the Collier County Emergency Management Department in the annual issuance of its All Hazards Guide.

~~**Policy 7.3** Require large-scale new developments east of U.S. 41 to provide shelters for hurricane protection where feasible.~~ ***[Replaced with new Policy FLU-3.2]***

Policy CCM-7.~~4~~3 Drainage Improvements

Provide for drainage improvements in repairs to roads along City-maintained evacuation routes. Levels of service for these routes will be maintained and, if possible, improved considering projected impacts from tidal flooding.

~~**Policy 7.5** Conduct and maintain an up-to-date inventory of all commercial fuel storage and sales sites in the City and develop regulations for the emergency management of the sale of fuel.~~ ***[Moved to Action CCM-7.5.2]***

Policy CCM-7.~~6~~4 Electrical Utilities

Encourage local electrical utilities to develop and maintain up-to-date fuel emergency and electrical conservation plans, and coordinate with local and state regulatory authorities for energy conservation and post-storm recovery.

Policy CCM-7.~~7~~5 Disaster Planning, Response and Post-Storm Reconstruction

Cooperate in implementing the disaster response and post-storm reconstruction and redevelopment programs, which integrate the coastal construction permitting requirements of

the Department of Environmental Protection, the Florida Building Code, ~~Office of Governor, Division of Emergency Management,~~ and City regulations.

> ~~**Policy 6.5**~~ **Action CCM-7.5.1** Participate in the National Flood Insurance Program (NFIP) and the Community Rating System (CRS), and strive to improve the City's Class Rating ~~its score~~ resulting in reductions in flood risk and insurance premiums for residents. ***[Moved from CCME Policy 6-5]***

> ~~**Policy 7.5**~~ **Action CCM-7.5.2** Conduct and maintain an up-to-date inventory of all commercial fuel storage and sales sites in the City and develop regulations for the emergency management of the sale of fuel. ***[Moved from CCME Policy 7-5]***

Policy CCM-7.~~8~~6 Local Mitigation Strategy Working Group

Participate with Collier County in the Local Mitigation Strategy Working Group for the purpose of reducing vulnerability to natural hazards that endanger the community.

> ~~**Objective 8 Climate Adaptation and Resiliency.**~~ ***[Objective 8 and accompanying policies were moved from the Conservation and Coastal Management Element and rewritten and expanded in the new Resiliency Element]***
>
> ~~Develop and implement adaptation strategies for areas vulnerable to flooding, tidal events, storm surge, flash floods, stormwater runoff, salt water intrusion, and other impacts related to climate change or exacerbated by sea level rise, with the purpose of increasing the City's vulnerability adaptability and resiliency capabilities.~~

~~**Policy 8.1**~~

~~Encourage innovation in residential and commercial design and construction to conserve water, energy and materials; reduce greenhouse gas emissions; and minimize environmental impacts.~~

~~**Policy 8.2**~~

~~Monitor sea level rise science to determine how sea level rise will affect the City and, based on pertinent data, the City will plan and act accordingly.~~

~~**Policy 8.3**~~

~~Address and minimize the impacts of sea-level rise and storm surge with strategies that also protect shoreline ecological functions, allow water-dependent uses, and provide public access.~~

~~**Policy 8.4**~~

~~Expand walking and bicycling infrastructure as options that produce low or zero emissions.~~

~~**Policy 8.5**~~

~~Consider projected climate impacts when developing and siting, or redeveloping, infrastructure, to maximize longevity and resiliency.~~

~~**Policy 8.6**~~

~~Consider measures to protect or relocate public facilities and infrastructure in areas projected to be affected by sea level rise and climate change impacts.~~

~~**Policy 8.7**~~

~~Identify, designate and preserve historically and architecturally significant resources, including structures, landmarks, and archaeological sites.~~

ENVIRONMENTALLY SENSITIVE HABITAT CLASSIFICATION

~~The areas designated as environmentally sensitive lands are delineated on the Future Land Use Map.~~ Preserving the integrity of these ~~areas~~ environmentally sensitive lands enhances the aesthetics and quality of life for City residents and tourists, provides a degree of natural protection against storms, helps maintain air and water quality, promotes marine and wildlife diversification and productivity, and promotes soil stabilization. Some of these habitats have significant ecological, hydrological, physical, or socioeconomic importance to the public. Other areas have moderate resource benefits or have substantial benefits that are less susceptible to adverse effects from alterations. Within conservation zones there may also be areas which are suitable for limited development. Before development can be approved, an environmental assessment must be prepared which details the specific habitats and communities present on the property and takes into account site topography and hydrology. This environmental assessment must be submitted with permit applications and associated materials required for such development.

The following provides a detailed description of each category of environmentally sensitive habitat.

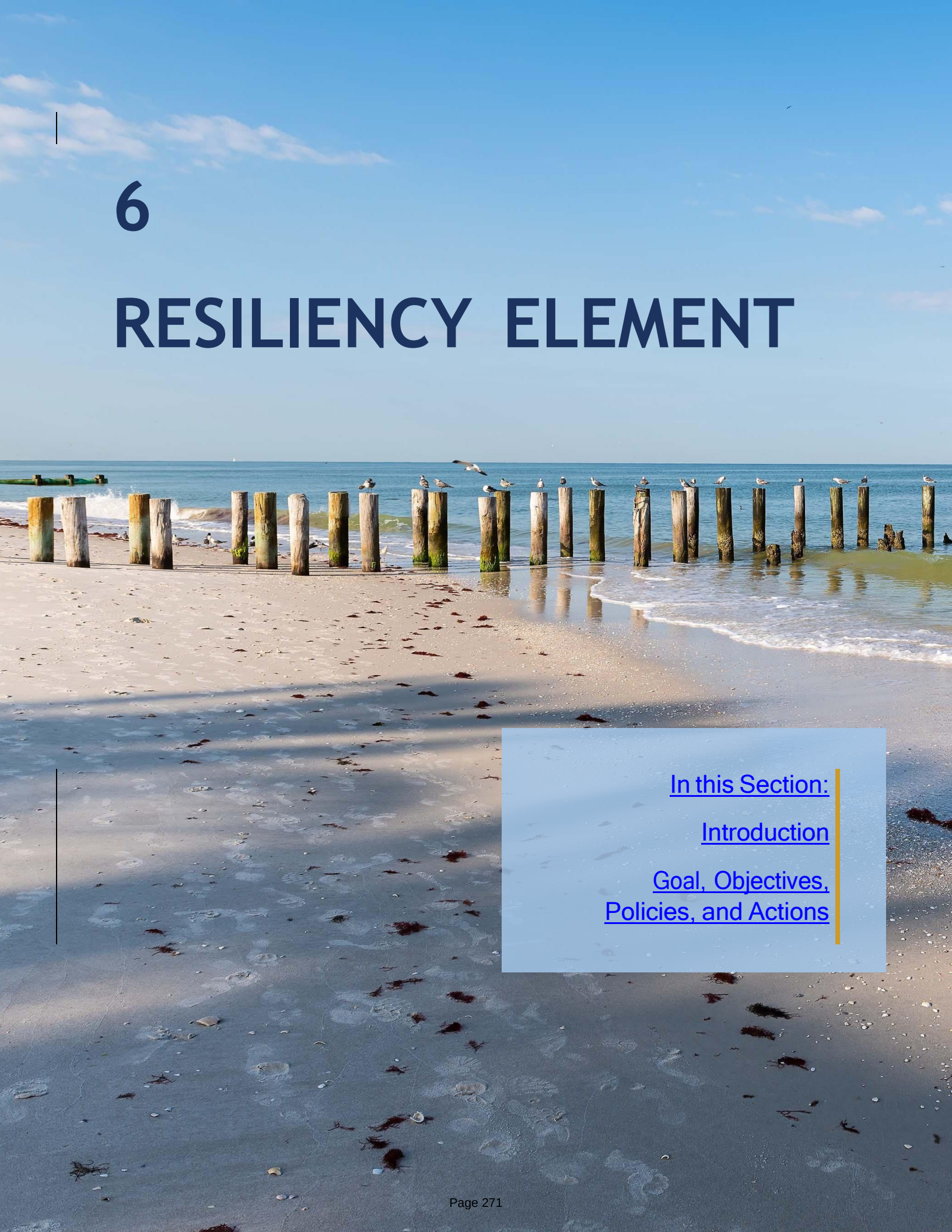
- **Submerged Resources** are defined as benthic habitat including, but not limited to, seagrass beds, oyster beds/reefs, shallow mud/sand flats (approximately 5 feet or less mean low water (MLW) in depth), attached and drift algae, and intertidal zones.
- **Seagrass communities** are highly productive habitats which act as nurseries for a broad group of organisms such as juvenile fish and crustaceans. The grasses are a vital food source for many animals, including the endangered West Indian manatee. They also stabilize bottom sediments (which aids in water quality improvement) and add oxygen to the water during daylight hours. Marine grass beds should be identified on a project-by-project basis through the normal local, state and federal dredge and fill permitting procedures, bulkhead and dock construction and maintenance dredging permitting, the general development and site plan review process, the development of significant environmental impact assessment, or the State's development of regional impact process.
- **Oysters** are the ultimate filter feeders, continuously feeding on bacteria and fine particles in the water. This makes them excellent cleansers of bay waters. The predisposition of oysters to grow in clumps, or reefs, in the subtidal and intertidal zones, makes them exceptional shoreline protectors. Oysters are an important food source for many animals.
- **Shallow Benthic Habitat**, whether or not it contains visible resources, is an important habitat to preserve due to the invertebrates that bury in the sediment and that live on the surface of the substrate, the potential of the substrate to house seagrass as a result of being in the photic zone, and the opportunities it provides for habitat restoration. Much of the historic shallow areas within the City have been dredged away, so protecting the remaining shallows is essential. For ~~the purpose of~~ this definition, shallow areas shall be

defined as those areas 5 feet in depth or less at mean low water. ~~The bathymetric mapping used to create the shallow benthic habitat area on the Natural Resources map is not all inclusive. Therefore, this map is to be used as a guidance document and e~~Evaluations are to be made on a case by case basis.

- **Tidal ~~swamp and marsh areas~~wetlands** are the vegetated areas above the low tide mark and below the yearly high storm mark. They are naturally vegetated with wet soil plants, usually salt-tolerant types of grasses, rushes, or some combination of red, black, or white mangrove. They cleanse runoff waters and regularize their flow. They take up, convert, store, and supply basic nutrients to the coastal ecosystems. They provide essential habitats for various coastal birds, marine species, and wildlife. They stabilize shorelines, prevent erosion, slow the surge of flood waters, and reduce inland flooding.
- **Freshwater ~~swamp and marsh areas~~wetlands** are areas contiguous to, or that provide a continued connection between, surface water areas and tidal waters, mangroves, or marshes. They have a high freshwater table and support water tolerant vegetation. These wetlands serve to store and gradually release fresh water into tidal waters, thereby maintaining the salinity cycle of the estuarine system. By maintaining a high hydrostatic head, they provide a barrier to saltwater intrusion.
- **Gulf beaches and dunes** extend landward of the mean high water (MHW) line and may include one or more low dune ridges. They protect inland areas from storm and wave action, provide habitat, nesting, and food sources to shorebirds, sea turtles, and other marine animals, and stabilize the shoreline.
- **City Stormwater Ponds (aka ~~/~~Lakes)/Other Artificial Ponds** - There are ~~31 ponds~~approximately 30 ponds, or lakes, within City boundaries that were constructed ~~40-50~~over 70 years ago to treat surface storm water runoff. ~~Of these 31 ponds, 11 are managed by the City. These ponds~~Some of these ponds~~, which~~ are a part of the City's storm water management system~~, are antiquated with~~ with many of them having little to no maintenance ~~being performed~~conducted on them. This greatly reduces their ability to filter out pollutants, provide wetland habitat, and serve their storm water retention function. With many having direct outfalls or flow-ways into our natural bays and Gulf, the impacts these ponds can have on estuarine water quality is significant. Most of these ponds are surrounded by residential homes, so engaging the homeowner regarding enhancements of these ponds is essential. Other artificial ponds are those ponds that are not a part of the City's stormwater system.
- **Conservation Lands** are areas within the City that are acquired for conservation, preservation, restoration and maintenance of vital and significant resources and their biodiversity. These lands include: threatened natural lands, forest, upland and wetland communities, environmentally sensitive lands, lands that have been altered but are capable of being restored, improved or unimproved lands that may be useful and lands that contain conservation easements, scenic easements or any other similar designations, located within and adjacent to the City, for the benefit of present and future generations.
- **Parks and Open Space** are public parks within the City, as well as undeveloped lands that could potentially become parks.

6

RESILIENCY ELEMENT



In this Section:

Introduction

Goal, Objectives, Policies, and Actions

INTRODUCTION

The City of Naples recognizes the need to proactively address environmental risks to safeguard the safety, well-being, and quality of life of its residents, as well as the community's long-term sustainability and prosperity. Naples' coastal setting along the Gulf and Naples Bay contributes to its natural beauty, vibrant neighborhoods, strong economy, and high quality of life. At the same time, the City's low elevation and location make it vulnerable to a range of hazards, including sea level rise, storm surge, tidal flooding, rainfall, hurricanes and extreme heat.

These hazards are interconnected. Rising seas can intensify tidal flooding and exacerbate stormwater challenges, while higher temperatures affect public health, energy demand, and urban comfort. The increasing frequency of extreme weather events requires Naples to adopt proactive strategies that allow residents, neighborhoods, and the broader community to withstand, adapt to, and recover from environmental disruptions making the community more resilient.

These threats pose risks to residential areas, critical infrastructure, public safety systems, natural resources, and the robust economy that supports the City's prosperity. Recent hurricanes in Southwest Florida underscore the importance of forward-looking resilience planning that prioritizes protection for residents and the quality of life of Naples' residents.

Resiliency refers to the ability to successfully adapt to stressors, maintaining psychological well-being in the face of adversity. It is the ability to "bounce back" from difficult experiences.[1] After experiencing numerous storm events and seeing the visible impacts on the community related to increased tidal flooding, increased heat days and seasonal impacts, the City has first-hand experience in the changing impacts of current and future environmental conditions.

The City has engaged in systematic efforts related to data development and education and outreach to residential and business communities and is a model for these activities. The result is a more engaged community and can be seen in City workshops and feedback from residents, business owners and appointed and elected officials. This Resiliency Element is a response to those efforts and community support.

With data generated from the City's Urban Forestry Program, Critical Assets and Facilities Vulnerability Assessment (2023) and the Critical Assets and Facilities Adaptation Plan (2024), Stormwater Plans and other resiliency-related planning efforts, the City can also better incorporate current and future hazard risk impacts, which may include adaptation or relocation of facilities. City actions may also include an acknowledgement that not every asset or neighborhood can be adapted to reduce flood risk or address other hazards. Maintenance of assets may be the only technically and financially feasible strategy due to right-of-way constraints, environmental regulations, elevation of the asset, the need of that asset to serve an existing population in that location or other constraints. Adaptation is particularly challenging in long-established and built-out communities. This is because there is less land area to

[1] U.S. Department of State.

implement these types of projects or the area is built out and redevelopment becomes the more tangible opportunity to increase resiliency.

Increased resilience can come with additional costs at the infrastructure or individual property level. But these costs and challenges must be weighed against the benefits such as stable or reduced insurance premiums, the cost of rebuilding and protection of tax base and other economic factors. Additionally, other resiliency strategies may not be consistent with other state or national policies such as certain types of flood barrier or filling in natural floodplains to elevate a property which can be a constraint on adaptation actions. The reality is that communities may not be able to adapt everything, but the data generated from the City's aggressive planning efforts will be useful in improving priority-setting and decision-making.

This Resiliency Element establishes policies to guide the City in protecting residents, safeguarding infrastructure and public assets, preserving natural systems, and sustaining environmental quality, economic vitality, and neighborhood livability. A resilient Naples will reduce environmental risk while maintaining the City's small-scale coastal character and high quality of life for current and future generations. The City shall integrate resilience considerations into capital planning, land use decisions, infrastructure investments, and environmental management to reduce long-term risk and strengthen community resilience.

Although not required pursuant to Chapter 163, Part II, Florida Statutes (Community Planning Act), the City of Naples has elected to include a Resiliency Element as an optional element of the Comprehensive Plan and has coordinated it with other Plan elements to ensure a holistic approach across policy and decision-making. By guiding decision-making across City operations, land development, and infrastructure investment, this Element ensures that Naples remains a safe, sustainable, and vibrant coastal community for current and future generations, with residents' quality of life as a central consideration.

GOAL, OBJECTIVES, POLICIES, AND ACTIONS

The following goal, objectives, policies, and actions address the pertinent issues for the Resiliency Element. They are intended to plan for the current and future hazards, correct deficiencies, meet the level of service standards, adapt or relocate facilities, and fund additional projects.

GOAL

The City shall address adaptation planning needs and capital improvements decisions related to infrastructure and assets, neighborhoods, and natural resources that experience impacts from natural hazards. Such hazards include, but are not limited to, extreme high tides and storm surge, the related impacts of rising sea levels, and heat. The City shall develop policies to improve resiliency to current and future stressors and coordinate efforts across planning, infrastructure and service delivery to improve decision-making.





Objective R-1 Strengthen Community and Infrastructure Resiliency Resources

The City shall strengthen community and infrastructure resiliency resources by implementing targeted strategies that reduce hazards, prioritize funding, create adaptation planning initiatives, and promote sharing of data and information. (See also Objective IC-4 and related policies in the Intergovernmental Coordination Element.)

Policy R-1.1 Coordination and Use of Resiliency Data

The City shall continue to coordinate with agencies, municipalities and other public and private entities to share the best available data and develop approaches to resiliency to enhance the quality of life and ensure the safety of residents and visitors.

> **Action R-1.1.1** The City shall incorporate the best available data into policy development and planning decisions, including results of vulnerability assessments and monitored/observed hazard impacts, repetitive loss data and the latest scientific predictions.

> **Action R-1.1.2** The City shall conduct and update vulnerability assessments, adaptation plans and watershed master plans that incorporate analysis of various flood hazards including rainfall, tidal, storm surge and the future impacts of sea level rise. –Results from existing or future vulnerability assessments will assist in defining flood mitigation priorities.

Policy R-1.2 Policy Development and Best Available Data

The City shall review projected flooding data related to transportation, other infrastructure, emergency management, natural resources and listed species, stormwater, utility and critical facilities, social vulnerability, existing and future growth, levels of service and other policy provisions for the development of projects, priorities, policies and maps.

Policy R-1.3 Continued Resiliency Leadership and Communication as a Region

The City shall continue leading on resiliency, flood management and adaptation planning issues through collaborative partnerships (for example, other Cities, Collier County, the Florida League of Cities, Chambers of Commerce, etc.) data exchange and a focus on strategic funding for the region.

> **Action R-1.3.1** The City shall coordinate with other governmental entities to develop and maintain an annual communications strategy that can leverage expertise across the internal departments and jurisdictions to ensure consistent, accessible messaging on resiliency data, flood risks, adaptation projects, and funding opportunities for all types of residential and business stakeholders.

Action R-1.3.2 The City shall conduct at least one annual community workshop on the status of its resiliency initiatives with the City Council. The City shall also collaborate with other governmental partners to host periodic regional resiliency forums and public workshops on hazard mitigation. These meetings shall provide residents, businesses, and community organizations with information on current and projected resilience challenges, such as flooding and infrastructure adaptation—and gather stakeholder input to inform City and municipal policy updates.

In addition to citywide workshops, the City shall seek meaningful engagement with affected neighborhood and homeowners' associations during the planning and prioritization of significant infrastructure and resiliency projects. Such engagement should occur early enough in the planning process to allow community input regarding documented flooding conditions, neighborhood access, project impacts, and potential implementation alternatives.

Action R-1.3.3 The City shall update City and regional administrative and public officials on the status of resiliency initiatives in concert with the annual budget cycle.

Policy R-1.4 Enhance Collaborative Efforts and Regional Partners

Develop, continue and enhance collaborative efforts with regional partners to develop other useful data sources for emergency management and vulnerability planning including real time flood monitoring and early warning systems, drought warning, wildfire detection, debris management, recovery and response, pre-storm preparedness including recovery vehicle staging, shelter readiness and capacity, evacuation and transportation planning, recovery resource staging and other strategic local mitigation planning initiatives.





Objective R-2 Address Infrastructure Vulnerabilities due to Hazards

The City shall address and periodically update the vulnerabilities of public infrastructure and assets due to flooding and other hazards within the Community by mapping and prioritizing locations that are at risk in the near-term factoring in the criticality of assets and those dependent upon them. (See also Objective PROS-2 in the Parks, Recreation, and Open Space Element and Policy CCM-4.11 in the Conservation and Coastal Management Element.)

Policy R-2.1 Identify Infrastructure and Assets at Risk

The City shall review vulnerability assessment results and mapping outputs to ensure that public utilities and facilities such as wastewater, gas, electric, communications, and water systems that are existing or proposed, are analyzed to determine potential flood damage due to different types of flooding. The City's data infrastructure shall also be considered a critical asset. Where replacement or relocation is not practicable, the City may determine that maintenance and protection of existing infrastructure is the most feasible response to flood risk including, but not limited to, electrical and backup power systems.

DATA COLLECTION AND FURTHER ANALYSIS

Policy R-2.2 Inventory Public Infrastructure and Assets

The City shall identify, update and maintain an inventory public infrastructure and assets including locations of assets. Emphasis shall be placed on roads, stormwater, wastewater and septic systems including lift stations, utilities, police, fire and emergency response facilities and areas where hazardous materials are stored or managed, but all critical public infrastructure and assets shall be included. This effort shall be coordinated between City staff for the development of a centralized database to incorporate into capital improvement decision making. The City should enhance these datasets with information on asset elevations and conditions to determine prioritized at risk facilities and timeframe for impacts and update them as needed.

> **Action R-2.2.1** The City shall identify, maintain and update a prioritized inventory of infrastructure and assets including buildings, structures, and other facilities that are at risk of hazards and flooding due to (1) storm surge (2) king tides (3) rainfall-induced flooding thresholds or (4) combined flooding events. The City shall develop maps indicating the locations of such areas.

> **Action R-2.2.2** The City shall consider vulnerable historical, cultural or archaeological resources within the range of infrastructure and assets that must be included within its adaptation planning initiatives. Those areas shall be mapped, and collaboration shall occur with cultural, archaeological or historical experts to ensure those impacted areas can be protected, preserved and/or relocated for the use and enjoyment of future generations. The City shall also consider developing historic structure flood guidelines.

Policy R-2.3 Coalesce Stormwater Planning

The City shall coalesce its stormwater planning in concert with its Community Rating System (CRS) activities and the Stormwater Master Plan (and updates) and Multi-Basin Assessments. Such efforts shall include consideration of measures that include nature-based solutions to manage stormwater and consolidation of existing stormwater outfalls. Such studies should evaluate co-benefits such as water quality improvements, flood storage enhancements, and opportunities to integrate stormwater retrofits into capital improvement projects (CIPs). Such analyses shall include design life expectations and assumptions for future rainfall conditions and compound flooding considerations as appropriate. Within two (2) years, the City shall revisit adopted stormwater levels of service to determine if more specificity is necessary to manage expectations for the functionality of the system considering tidal flooding and future water resource conditions.

The City shall integrate the findings and recommendations of its Stormwater Master Plan, Multi-Basin Assessments, and Critical Infrastructure Resiliency initiatives into a coordinated, phased infrastructure improvement strategy. Such efforts should prioritize immediate remedial actions, targeted improvements to identified drainage deficiencies, and long-term renewal of aging stormwater and utility infrastructure. Implementation priorities shall consider documented flooding conditions, infrastructure age and condition, public safety, adopted levels of service,

and opportunities to coordinate improvements across utility systems.

Policy R-2.4 Future Modeling and Analysis

For future modeling and analysis, the City shall coordinate with state and federal partners, to analyze rainfall curves and integrated water resource information to provide more

comprehensive data about the relationships between tidal inundation and precipitation patterns that will further exacerbate the impacts of flood risk on public infrastructure and assets.

Policy R-2.5 Planning Measures based on At-Risk Assets

The City shall evaluate the need for site-specific adaptation planning measures based on vulnerability assessments and maps identifying at-risk assets. New or expanded public facilities should not be located in areas vulnerable to flood risk projected during the useful life of that infrastructure, if feasible. Where public facilities are proposed for adaptation, renovation or expansion, relocation must be considered, if feasible, prior to project approval.

> **Action R-2.5.1** The City shall analyze and prioritize at risk City-owned roads for potential capital planning related to retrofitting, elevation or continued maintenance to determine opportunities and challenges to road adaptation. The City shall determine if adaptation is feasible given existing environmental conditions, right-of-way constraints and other factors that may limit the ability to elevate such roads.

> **Action R-2.5.2** The City shall update and maintain a dataset of all City-owned facility building elevations for use in resiliency, emergency management and recovery planning. Such data shall be used in developing priorities for City facility adaptations including temporary or permanent improvements.

INTEGRATING SEA LEVEL RISE AND FLOOD RISK INTO CAPITAL PLANNING DECISIONS

Policy R-2.6 Incorporate Projections and Data

The City shall incorporate sea level rise projections and flood risk data into the design and evaluation of capital planning projects for assets and facilities for the useful life of the project. The City shall evaluate, and where appropriate, amend its Code of Ordinances, floodplain management provisions or Public Works policies to incorporate design standards which could include, but not be limited to: green infrastructure/nature-based flood hazard protection, low impact development (LID), stormwater design events, debris management and onsite retention requirements, road elevation, shorelines, pervious and cool pavement technologies, tree shading, green space requirements, drought tolerant landscaping, and locations and elevations of supporting equipment such as electrical, pumps, and treatment areas. The City shall develop supporting design manuals that convey examples of design types to communicate the goals of making infrastructure projects more resilient while achieving other co-benefits such as improving water quality treatment. (See also Future Land Use Element Action FLU-1.20.5.)

Policy R-2.7 Capital Projects and Budget Process

The City shall evaluate capital projects during its budget process to ensure that each project is designed to incorporate consideration of future flood risk for the useful life of the project and provide continuity of service to the extent practicable.

The City shall incorporate identified infrastructure deficiencies, vulnerability assessments, adopted levels of service, and documented recurring flooding conditions into its annual capital improvement planning and budget process. Capital project priorities should be established through a transparent, data-driven evaluation that considers public safety, infrastructure condition, frequency and severity of flooding, service reliability, and long-term community benefit.

> **Action R-2.7.1** The City shall establish procedures to review capital projects for flood risk. Prior to incorporating a new project into the Capital Improvements Element, the City shall review it for recommendations to increase resiliency and account for the impacts from flooding. The City shall focus on the criticality of the project for service needs, level of service standards, and practicality of managing flood risk for the project as points of analysis to ensure that infrastructure useful life and service expectations can be met considering impacts. The City may also conclude that adapting projects to address future risk is not practicable.

Policy R-2.8 Design Considerations

The City shall incorporate reliability engineering design considerations for energy and/or power back-up systems including, but not limited to, renewable energy and backup power generation and storage (as cost and service effective) to serve infrastructure making it resilient to outages.

INCLUDE RESILIENCY STRATEGIES INTO PUBLIC FACILITIES AND CAPITAL IMPROVEMENTS PLANNING

Policy R-2.9 Evaluate Need for Design Standards

The City shall evaluate the need for and implement design standards to harden and mitigate critical public infrastructure to the impacts of flooding through elevation, impact resistant openings, temporary flood barriers, roof reinforcement and other wind and flood improvements to reduce service disruption and increase recovery of facilities' operations.

> **Action R-2.9.1** The City shall evaluate the cost, value, benefits, and constraints of incorporating energy efficient roofing materials and cooling systems, passive design features for lighting, ~~–~~renewable energy sources, and power storage systems to reduce heat stress and maintain continuity of facilities operations for government buildings.

> **Action R-2.9.2** The City shall maintain and periodically update a prioritized list of critical assets that are in vulnerable locations, have experienced repeated impacts or failures during hazard events or have exceeded their design life for replacement or retrofitting projects so that they can be updated and maintain continuity of operations.
> Priority shall be given to critical infrastructure exhibiting repeated operational failures, documented flooding deficiencies, or conditions that compromise public safety and essential services. The City shall seek to coordinate the rehabilitation or replacement of aging stormwater, wastewater, potable water, and other utility systems where concurrent improvements provide operational efficiencies, reduce repeated construction impacts, and improve long-term service reliability.

Policy R-2.10 Enhance an Asset Management System

The City shall develop or enhance an asset management system to incorporate thresholds combining age, condition, vulnerability, risk and service expectations for critical facilities. This shall also include the combined effects of multiple types of flood risk that exacerbate impacts upon interdependent facilities and operations.

COLLABORATION AND OUTREACH ON ADAPTATION RESPONSE

Policy R-2.11 Collaborate with Service Providers

The City shall collaborate with service providers and other regional partners such as, the Florida Department of Transportation, Florida Department of Health, Collier County School District, privately-owned medical facilities, cellphone and internet service providers, Florida Power & Light, and other energy providers, and other regional partners to exchange data, plans, and solutions to address future vulnerability and flood risks including continuity and recovery of service after storm events. The City shall also share vulnerability data across City departments, other governmental entities and critical care providers.

Policy R-2.12 Development of Resiliency and Adaptation Projects

The City shall coordinate the development of resiliency and adaptation projects with its pre-disaster mitigation plans, the Local Mitigation Strategy and other emergency management and disaster recovery strategies and planning efforts.

Policy R-2.13 Implement a Public Awareness Program

The City shall develop and implement a public awareness program using signage and related outreach tools to inform residents and visitors of anticipated periodic tidal or other inundation impacts on infrastructure including roads, drainage systems, and impacts on buildings and facilities such as parks and open spaces so that the community is aware of the impacts to transportation or access to services. Seasonal high-tide flooding events shall be used as opportunities to illustrate potential future sea level rise impacts on transportation access, community services, and infrastructure.

Policy R-2.14 Educating Community about Adaptation Measures

The City shall use capital project construction activities as an opportunity to educate the community about adaptation measures and investments that strengthen resiliency to flooding, storm events, and other shocks and stressors. The City shall coordinate with its Public Information Office to communicate through signage, public information releases and on web applications and social media.

FUNDING ADAPTATION RESPONSE

Policy R-2.15 Funding Structures and Alternatives

The City shall evaluate funding structures and alternatives that include leveraging granting programs, assessments and/or user fees to increase project resiliency to flooding impacts.

Policy R-2.16 Funding Opportunities

The City shall ensure adaptation project design and analysis aligns with Section 161.551, F.S. (Public financing of construction projects within the coastal building zone), Rule 62S-7, F.A.C.

(Sea Level Impact Projection (SLIP) Studies for State-Financed Coastal Construction), and Section 380.093, F.S. (Statewide Flooding and Sea Level Rise Resilience), so that adaptation projects are competitive for funding opportunities. This shall include review of technical criteria in these provisions so that if public funding is received for such projects, sea level rise and future flood risk are integrated into project development.



Objective R-3 Address Vulnerabilities of Neighborhoods

The City shall address the vulnerabilities of neighborhoods or portions of neighborhoods due to hazards and flood risk within the Community.

Policy R-3.1 Neighborhoods At Risk of Flooding

The City shall develop strategies to address flooding in at risk neighborhoods related to City-owned infrastructure and assets and policies that can improve the resiliency of private property.

The City shall prioritize neighborhood-level flood mitigation strategies that address documented drainage deficiencies, recurring flooding, and vulnerabilities associated with aging public infrastructure. Such strategies should consider neighborhood-specific conditions, including stormwater conveyance, tidal influences, roadway elevations, emergency access, and the interaction between public infrastructure and private property drainage systems. The City should coordinate with affected neighborhood associations in identifying priorities and evaluating potential solutions.

> **Action R-3.1.1** The City shall identify, maintain and update data regarding neighborhoods or portions of neighborhoods that are at risk of flooding. The City shall maintain maps indicating the locations of such areas.

HOW WE BUILD TO IMPROVE RESILIENCY

Policy R-3.2 Review Floodplain Management Ordinance

The City shall review its current floodplain management ordinance, and as needed amend its Floodplain Management Ordinance and related regulations to incorporate data from vulnerability assessments, adaptation plans, stormwater plans and watershed master plans. This analysis shall be used to identify neighborhoods and structures at increased flood risk and to increase opportunities for protection through enhanced stormwater, freeboard, elevation standards, voluntary retrofit programs, and community outreach.

> **Action R-3.2.1** The City shall evaluate the need for additional freeboard requirements due to the City's location and proximity to the coast and its low-lying areas.

> **Action R-3.2.2** The City shall review, and where necessary revise, its fill and grading policies consistent with the National Flood Insurance Program within residential

neighborhoods, to ensure that appropriate fill materials and elevations are used that protect properties, but do not compromise other adjacent properties, water quality and are coordinated with shoreline policies.

Policy R-3.3 Incentives for Private Property Construction or Retrofits

The City shall consider providing incentives for private property construction or retrofits to achieve FORTIFIED Home and FORTIFIED Commercial (a program by the Insurance Institute for Business & Home Safety or IBHS), Waterfront Edge Design Guidelines (WEDG) or other above-

code resiliency standards for renovations and new construction to make homes and businesses more resilient. This should include work with other City partners, IBHS, and other organizations to build local contractor support and capacity to conduct these credentialed evaluations of properties to achieve these standards.

Policy R-3.4 Review Development Standards

The City shall review development standards for development projects to determine any need for revisions and/or incentives to increase the resiliency through incentives and other strategies. Development design standards for Florida-Friendly landscaping, shade tree retention, enhancement and planting, permeable pavement, bioswales, rain gardens, green roofs and floodable open spaces should also be included in this review.

Policy R-3.5 Divert Development Away from Vulnerable Areas

The City shall identify feasible incentives to divert future development and redevelopment away from vulnerable areas, such as transfer of development rights, clustering, density bonuses or other programs to help ensure the long-term economic resiliency of the area.

The City shall evaluate feasible, voluntary incentives to direct new development away from areas identified as particularly vulnerable to flooding and other natural hazards, consistent with adopted land use policies and applicable state law. Such strategies shall recognize the distinction between new development and the lawful redevelopment, reconstruction, or improvement of existing properties. Implementation shall respect established residential neighborhoods, existing property rights, and the ability of property owners to maintain and improve their properties in accordance with applicable regulations.

Policy R-3.6 Emphasize Protection and Enhancement

The City shall review data from its vulnerability assessment to identify locations where it is necessary to emphasize protecting and enhancing the built and natural environments of neighborhoods from flooding impacts, prioritizing natural green infrastructure approaches to the extent practicable. The City will consider developing localized flood mitigation plans at the neighborhood scale that will allow for the design of more detailed adaptation strategies such as infrastructure retrofits, enhanced storage areas, shoreline adaptation strategies and habitat restoration.

Policy R-3.7 Geographically Based Analysis

The City shall develop a geographically based analysis of existing housing-stock vulnerability using data on repetitive-loss areas, building age and condition, compliance with current building codes, and location within Special Flood Hazard Areas. Findings shall inform housing and mitigation programs to prioritize resiliency retrofits and funding.

> **Action R-3.7.1** The City shall promote programs that assist property owners in retrofitting existing housing to meet resilient design standards. Such efforts may include partnerships to secure grant funding, establish low-interest loan programs, or offer incentives to improve structural hardening and accessibility in flood prone areas.

PRIVATE PROPERTY ADAPTATION

Policy R-3.8 Financing Opportunities and Tools

The City shall identify resources regarding a suite of financing opportunities and tools to assist individuals with personal home or business adaptation. This could include funding resources to aid property owners for weatherization, mitigation, flood-proofing, elevation and other flood-

resistant improvement projects. Targeted communications about such funding sources shall be prioritized at the neighborhood scale.

Policy R-3.9 Better Link Resiliency Improvements

The City shall collaborate with regional partners to better link insurance credits for resiliency improvements, retrofits and construction with actual savings on flood and wind insurance.

Policy R-3.10 Federal and State Grant Programs

The City shall continue participating in federal and state grant programs and leverage disaster recovery and resiliency funding to reduce future flood losses. Such programs may include implementation strategies that provide funds for acquiring repetitive loss properties, elevating (lifting) structures, acquiring residential properties and returning the land to its natural state, or demolishing residential properties and rebuilding National Flood Insurance Program (NFIP)-compliant insured structures.

Policy R-3.11 Implement Periodic or Season Discounts

Consistent with state law, the City shall evaluate and where feasible, implement periodic or seasonal discounts on permits for resiliency upgrades such as impact windows, reinforced roofs, solar panels, energy efficiency improvements, and other projects that help families prepare for storm season, flood mitigation, and cost savings for utilities.

OUTREACH AND EDUCATION TO HOME AND BUSINESS OWNERS

Policy R-3.12 Sharing of Data through Citizen Science Initiatives/Programs

The City shall promote the collection and sharing of data through citizen science initiatives/programs and create a publicly accessible, GIS-based platform where residents and business owners can upload photographs and flood related observations to support documentation of local conditions.

Policy R-3.13 Neighboring Jurisdictions

The City shall collaborate with neighboring jurisdictions on development of a Resilience Hub to facilitate communication, distribute emergency supplies, and provide services to residents before, during, and after hazard disruptions.

Policy R-3.14 Business-Oriented Stakeholders

Target business-oriented stakeholders for outreach and data compilation on business disruption, resiliency and recovery opportunities and benefits.

> **Action R-3.14.1** Continue to provide public outreach and education to the community on the importance and benefits of mitigating flood risks through land use regulations, building construction codes, flood elevation requirements and stormwater management.

Objective R-4 Identifying Locations at Risk

The City shall assess the vulnerabilities of natural areas, open spaces and parks due to hazards and flooding by identifying locations at risk within the short, medium, and long-term planning horizons.

Policy R-4.1 Natural Areas, Open Spaces, and Parks at Risk

The City shall include natural areas, open spaces and parks as critical assets to be protected from increasing flood risk.

> **Action R-4.1.1** The City shall identify natural areas, open spaces and parks that are at risk in the short, medium and long-term due to hazards and flooding. The City shall develop maps indicating the locations of such areas.

ADAPTING SHORELINES

Policy R-4.2 Shoreline Adaptation

The City shall develop shoreline adaptation strategies and policies that distinguish between City-owned and private shorelines and consider current and future flood impacts upon those areas.

> **Action R-4.2.1** The City shall develop a baseline inventory of shoreline conditions that documents the relationships between existing shoreline type (hardened, natural, and living shoreline), their proximity to private or public development, and if new shoreline response is needed to protect public or private assets. This may include surveying conditions, determination of shoreline heights and outfalls from which to make decisions on future projects or policies. Such data should support the development of a shoreline adaptation strategy. This information should also be used to support projects that create living shorelines and protect or enhance healthy mangrove resources and wetlands.

> **Action R-4.2.2** The City shall identify and map publicly owned shoreline areas that are vulnerable and would benefit from coastal adaptation measures such as living shorelines, hybrid shorelines or seawalls.

Policy R-4.3 Shoreline Protection, Restoration Plans, and Funding Strategies

The City shall coordinate with regional partners on beach, dune and shoreline protection, restoration plans and funding strategies. This may include appropriate beach renourishment and sand bypass as well as dune fortification and restoration with native beach dune vegetation. Within three (3) years, the City shall review and revise its dune protection requirements if necessary and continue to facilitate dune restoration events within the community.

The City shall work collaboratively with Collier County and appropriate state and federal agencies to identify and address regulatory, logistical, and funding barriers to comprehensive

shoreline protection and beach nourishment. Regional coordination should seek equitable consideration of coastal areas throughout the City and support long-term strategies that protect public safety, natural resources, and the economic and environmental benefits of healthy beaches and dune systems.

Policy 4.4 Promoting Nature-Based Solutions for Shorelines Where Feasible

The City shall evaluate and update its shoreline policies to acknowledge the existence of hardened shorelines that require continued fortification while promoting the creation and expansion of living shorelines and other nature-based resiliency strategies where possible. Relationships between existing shoreline type and protection benefits to other infrastructure should be analyzed as part of this process.

> **Action R-4.4.1** The City shall update its Code~~,~~ as necessary, to modify design standards considering future sea level rise, alternative strategies that enhance water quality, the effectiveness of disclosures to property owners upon resale and the relationship between shoreline and fill policy for properties that need additional elevation protected by an existing seawall.

Policy 4.5 Maintaining Healthy Dune Systems

Continue to coordinate with the County and other necessary agencies to formalize beach renourishment priorities, assess dune revegetation project findings to determine the most successful mix of vegetation species and best planting practices for future efforts, identify areas to expand dune planting projects, and develop public messaging about project purposes.

LAND PROTECTION AND MANAGEMENT

Policy R-4.6 Evaluate Land Protection

The City shall evaluate and where appropriate, revise its land protection, acquisition and land management strategies or priorities to support nature-based contributions to benefit the City's adaptation response such as mitigation of shoreline erosion, reduction of heat islands and consideration of the need for species of plants or animals to migrate as tidal flooding impacts increase over time.

Policy R-4.7 Underutilized or Vacant Properties

The City shall identify and evaluate underutilized or vacant properties within neighborhoods that may be acquired or repurposed to enhance water quantity and quality treatment, dual purpose floodable parks and open spaces that provide recreational opportunities as well as resiliency benefits simultaneously.

Policy R-4.8 Opportunities for Joint Funding of Adaptation Projects

The City shall identify and pursue opportunities for joint funding of adaptation projects, including wetland, shoreline, and habitat restoration. The City shall share information on these resources with other stakeholders and partner strategically and proactively on projects.

Policy R-4.9 Sand Dunes or Mangrove Stands

In coastal high hazard areas, alteration of sand dunes or mangrove stands shall be permitted only when supported by engineering and environmental analysis demonstrating that such alteration will not increase the potential for flood damage, storm surge impacts, or erosion.

> **Action R-4.9.1** The City shall develop and distribute educational materials to contractors and property owners regarding the value of sustainable landscaping practices, pervious surfaces, natural lands management, the enhancement of urban tree canopy (consistent with Green Print 2024, the Tree Fill-In Program and other regulations), using Florida Friendly landscaping materials and the use of landscaping that retains more stormwater onsite to achieve improved water quality.

IMPROVING WATER QUALITY

Policy R-4.10 Reduce Nutrient Loads to Receiving Waterbodies

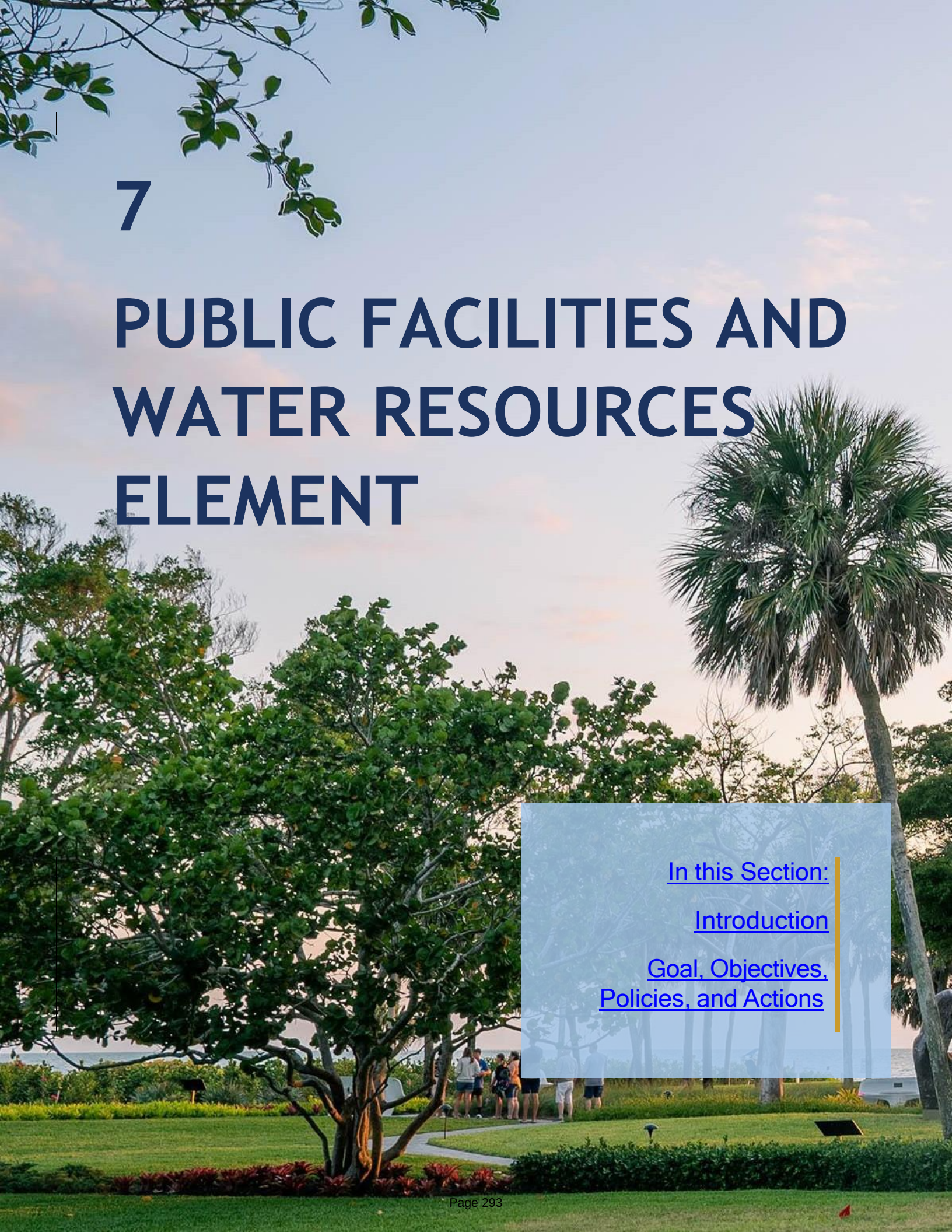
The City shall study, plan, and implement measures to reduce nutrient loads to receiving waterbodies through capital improvement projects, enhanced best management practices, land development regulation updates, and other strategies. This shall include linking activities to any required regulatory reporting whenever possible.

Policy R-4.11 Modifications to Landscape and Shoreline

The City shall review and where appropriate modify landscape and shoreline canal vegetative requirements (where authority exists) to increase appropriate plantings and manage tidal impacts, drainage flows, water quality and erosion. This should include engagement with the SFWMD regarding the impacts of current and future flood events on the secondary and primary canal systems in the City. This shall also include consideration of the potential for algal blooms and how these impacts would affect structural operations.

7

PUBLIC FACILITIES AND WATER RESOURCES ELEMENT



In this Section:

Introduction

Goal, Objectives, Policies, and Actions

INTRODUCTION

The Public Facilities and Water Resources Element establishes the framework for a local government to plan, provide, and manage the public facilities necessary to support existing and future development within the service area. Adequate infrastructure is essential for protecting public health, safety, and quality of life; safeguarding environmental resources; and sustaining economic vitality. This element ensures that these facilities are planned and provided in a manner that is coordinated with growth and development patterns over the long-term 20-year planning horizon.

This Element is prepared consistent with the requirements of Florida Statutes Chapter 163 Part II (Community Planning Act), specifically Florida Statutes section 163.3180 which provides that solid waste, drainage, and potable water and wastewater (sanitary sewer) are subject to concurrency requirements on a statewide basis. This is meant to ensure that public facilities and infrastructure are available concurrent with the impacts of development, adopted level-of-service standards are maintained for essential infrastructure systems, and the City opts to also apply concurrency standards to transportation facilities and parks and recreation facilities. Accordingly, this Element sets forth the principles, guidelines, standards, and strategies for evaluating and identifying projected demand based on anticipated population and development patterns.

This Element supports and implements the Vision Element of the Comprehensive Plan and is closely coordinated with other elements, particularly the Future Land Use, Housing, Conservation and Coastal Management, Intergovernmental Coordination, and Concurrency and Capital Improvements Elements. Together, these Elements ensure that infrastructure planning supports sustainable growth, protects natural resources, and maintains the quality of life for current and future residents.

Implementation of the Public Facilities and Water Resources Element occurs through capital improvement programming, development review procedures, intergovernmental coordination, and ongoing monitoring of infrastructure capacity and performance to maintain consistency with state planning requirements and evolving community needs.

Adequate potable water, sanitary sewer~~s~~, stormwater collection and disposal, domestic solid waste collection and disposal, ~~potable water,~~ surface water management including lake systems within the City-Stormwater Utility District, measures for aquifer protection, and (electric) utility distribution systems are essential in order to serve current and anticipated future customers and development. Therefore, these systems must be planned in coordination with the Future Land Use, Housing, and other elements of the P~~p~~lan. These facilities also must be functional considering varying types of flood risk now and in the future. In addition, wastewater and solid and hazardous waste disposal also have a significant impact on the environment. Therefore, the policies and guidelines of the Conservation and Coastal Management Element must also be considered.

Population Projections and Service Area Methodology. To ensure that public facilities are sized appropriately for future growth, the City employs a dual-track approach to population forecasting. While the Comprehensive Plan generally focuses on jurisdictional boundaries to guide land use policy, in planning for public facilities and water resources a broader analysis is required to maintain infrastructure reliability across the designated Service Areas.

For areas served by the City's Water and Wastewater Utilities, permanent and seasonal population estimates and projections are based upon demographics from the 2020 Census modeled by Metro Forecasting Models per a state-accepted methodology used to evaluate system capacity at maximum occupancy within the service area. This model includes transient visitors in hotels in the estimated and projected seasonal population to plan for service demands generated by both residential and non-residential uses.

Potable Water & Sanitary Sewer. The City of Naples operates a water treatment plant and a wastewater treatment plant. The water service area extends beyond the corporate limits of the City serving approximately 18,000 water accounts and an estimated population of 62,000 (2025). (See Action IC-2.1.1 in the Intergovernmental Coordination Element.) The wastewater service area also extends beyond the city boundary and includes approximately 9,000 accounts with an estimated population of 45,000 (2025). The water plant has a 30-million gallon per day (MGD) treatment capacity, which is adequate to serve a projected maximum water service area population of 100,000 | +/- 10% based on the current Level of Service (LOS) standard of 300 gallons per capita, per day. The wastewater treatment plant was upgraded in 2001 to expand the capacity from 8.5 to 10 MGD. This increased capacity will be adequate to serve a projected maximum sewer service area population of ~~66,667~~ 100,000 | +/- 10% based on the current LOS standard of 150 gallons of treated effluent per capita, per day. The City also maintains a comprehensive system of mains and hydrants to ensure adequate water supply to fight fires. ~~This expansion and upgrade project was completed in 2001.~~ A Water/Sewer Master Plan is anticipated to be completed in early 2027.

Stormwater Management. The City's stormwater drainage system is divided into 12 drainage basins. Stormwater management development standards have been incorporated into the City's Code of Ordinances which assists in the overall water management effort. The City also operates from a Stormwater Ordinance creating an Enterprise Fund driven Utility and Master Plan with completion anticipated in early 2027 with a 20-year investment horizon.

Solid Waste. The City utilizes a 300-acre sanitary landfill which is owned by Collier County. Collier County has contracted with Waste Management of Collier County, Inc., to operate the landfill ~~to 2016~~. ~~The current site has sufficient raw land capacity to the year 2016. The County has initiated a comprehensive landfill study to evaluate projected capacity needs, alternative solutions and potential locations for a new landfill site.~~

~~On May 7, 2008, the Naples City Council approved a non-residential mandatory recycling ordinance. The ordinance provided the establishment of a recycling program for non-residential property within the City of Naples. By implementing this ordinance, the City will reduced the solid waste stream to the landfill in order to preserve valuable landfill airspace and conserve natural resources.~~

Naples collects residential waste from approximately 5,800 single-family homes and 10,500 multifamily units. Commercial waste is collected from nearly 650 commercial customers and more than 460 condominiums. The City is in the process of evaluating its solid waste services to provide more reliable and cleaner energy sources for municipal solid waste and recycling trucks through interlocal agreements and/or private public partnerships to modernize the service fleet by transitioning to flex/fuel, primarily powered by compressed natural gas (CNG) trucks. (See Action IC-2.1.2 in the Intergovernmental Coordination Element.)~~City staff is evaluating and preparing for the implementation of a single stream recycling cart program for recycling customers. Currently, staff is working on removing and transporting recyclable material from the City's staging location as "single stream" source in order to provide residents a choice of from 65-, 35- or 18-gallon receptacles for recycling. Staff's goal, to provide a single stream recycling program by offering larger bins, is to reduce tonnage associated with disposal at the Collier County Landfill and increase the efficiency of the collections operations.~~ Larger carts are serviced by automated trucks that allow curbside service. The automated curbside service increases collection efficiency by reducing collection time. Solid waste recycle collection for residential and multifamily residences in 2024 was approximately 2,700 tons. ~~tonnage reductions are estimated in the 10% - 15% range .~~

In 2014, the City completed construction of the Solid Waste Transfer Facility located at the Naples Municipal Airport. Relocating the Solid Waste operations to airport property allowed for better use of public property within the City. The new facility included a large sorting floor used to transfer collected recycle material to an outsourced private and/or public materials recovery facility (MRF).

~~Solid Waste staff is also coordinating efforts to implement a pilot program for 95-gallon solid waste carts for the River Park Neighborhood (Anthony Park Area - East of Goodlette- Frank Road). The cart program consists of the delivery of 95-gallon solid waste carts to approximately 80 residents that reside within the neighborhood. The pilot program is intended to assist the residents with reducing the amount of special waste pick-ups required weekly in order to maintain the aesthetics and character of the community.~~

Surface Water and Aquifer Recharge. ~~Future population growth could potentially adversely impact underground water supplies due to contamination at aquifer recharge sites. Therefore, policies and programs are needed to protect sensitive recharge areas and regulate land use and human activities which could contaminate potable water supplies.~~ Collier County has adopted a wellfield protection ordinance. The City purchased 5-acre tracts of property where the Golden Gate wells are located. This reduces development that could occur near the well heads; therefore, providing the best protection measures. More importantly, it allows the City to build composite well-fields in different zones to be drought-resilient and provides access to an alternative water supply.

Electric. ~~Six (6)~~ Florida Power and Light (FPL) ~~substations, two (2) 138 KV and two (2) 230 KV transmission lines provide~~ serves the City's electricity needs. The ongoing planning program of FPL will ensure continued electrical service for the residents of Naples. ~~There are future plans to upgrade the River Park substation if growth returns and demands increase. Upgrades would include an additional substation within the existing substation.~~

GOAL, OBJECTIVES, ~~AND~~ POLICIES, AND ACTIONS

The following goal, objectives, ~~and~~ policies, and actions address the short and long-term issues concerning the provision of ~~the above-mentioned~~ public facility services in the City of Naples. When applicable, the goal, objectives, ~~and~~ policies, and actions are consistent with those proposed or adopted by Collier County, the Southwest Florida Regional Planning Council, the South Florida Water Management District, Big Cypress Basin Board, and the State of Florida. This is to ensure that the City's planning efforts will be compatible with local, regional, and state plans and goals.

GOAL

Ensure that the City's water resources, water management systems, and solid waste disposal procedures are managed in an economical, efficient, ~~and~~ environmentally sound, and resilient manner.

Objective PFWR-1: Maintain Adopted Levels of Service for Public Facilities





Monitor population projections and evaluate procedures and mechanisms in 10-year and 20-year planning time frames which ensure adequate potable water, surface water management, wastewater treatment facilities, solid waste facilities, and drainage systems for the present and future population of the City of Naples and its applicable service area. Programs based upon adopted Master Plans will provide general concepts and mechanisms to include correcting any existing or anticipated facility deficiencies, increasing system capacity as needed to accommodate growth and maintaining the adopted levels of service to assure that public facilities are adequate for future growth needs.

Policy PFWR-1.1 Capital Improvements Prioritization and Programming

~~On an annual basis, designate and prioritize projects or programs needed to~~ ***[Moved to Action PFWR-1.1.1 Policy 1.1~~***~~]~~ Maintain, improve, correct, ~~or~~ extend, or adapt public facilities to provide for future needs based on adopted level of service standards, input from neighborhoods and City departments, and coordination, where appropriate, with Collier County, regional and state agencies, and public and private utility providers, and include these in the Capital Improvements ~~Element~~ Program and approved by City Council.

> **Action PFWR-1.1.1** On an annual basis, designate and prioritize projects or programs needed to address public facility needs as part of the update to the Capital Improvements Program. ***[Moved from PFWRE Policy 1.1]***

Policy PFWR-1.2 Water, Sewer, and Surface Water Distribution Systems

Provide efficient, resilient, and dependable distribution and collection systems to serve the potable water, sanitary sewer, and surface water management needs of ~~residents~~ customers within the service areas, while minimizing adverse environmental effects.

Policy PFWR-1.3 Priority Extension of Central Water and Sewer Service

Give priority in the delivery of central water and sewer systems to existing, developed areas within the City's Water-Sewer District.

Policy PFWR-1.4 Equitable Provisions of Water and Sewer Service

Provide developing areas with water and sewer service in a manner that will not place an economic burden on, or adversely affect, existing users of these systems.

Policy PFWR-1.5 Limitations on Individual Water and Sewer Systems

Permit individual water or sewage systems within the City's Water-Sewer District only when connection to the central system is not available. Individual water and sewage systems will be phased out once central systems are available.

Policy PFWR-1.6 Water and Wastewater Development Fees

Water and wastewater system development fees will be adequate to finance debt service and capital improvements. ~~The fee structure will be evaluated annually to ensure that rates are adequate.~~ ***[Moved to Action PFWR-1.6.1]***

> **Action PFWR-1.6.1** The water and wastewater development fees structure will be evaluated annually to ensure that rates are adequate. ***[Moved from PFWRE Policy 1.6]***

Policy PFWR-1.7 Potable Water Level of Service Standards

The level of service standard for potable water facilities ~~are~~ is based on population served and design capacity of the water treatment plant for potable water and firefighting needs. The level of service standard is provided in the Concurrency and Capital Improvements Element and may be reviewed and updated periodically to ensure consistency with the 10-Year Water Supply Plan, as amended, Water Distribution System Master Plan, and specific planning studies and master plans related to potable water. ~~included in the sub-element, the Water Supply Facilities Work Plan. (Note: SFWMD permits all water withdrawal from available water resources.)~~

Policy PFWR-1.8 Sanitary Sewer Level of Service Standards

The level of service standard for sanitary sewage treatment is ~~to provide, at a minimum, the capacity to treat 150 gallons of effluent per capita, per day~~ provided in the Concurrency and Capital Improvements Element.

> **Action PFWR-1.8.1** Review and update level of service standards for sanitary sewage treatment periodically to ensure consistency with the Utilities Master Plan, as amended, and specific planning studies and master plans related to sanitary sewage treatment.

Policy PFWR-1.9 Solid Waste Level of Service Standards

The level of service standard for solid waste disposal is ~~1.10 tons per capita, per year~~ provided in the Concurrency and Capital Improvements Element.

> **Action PFWR-1.9.1** Level of service standards for solid waste disposal may be reviewed and updated periodically to ensure consistency with specific planning studies and master plans related to solid waste.

Policy PFWR-1.10 Surface Water Management Level of Service Standards

The level of service standard for surface water management for all development, redevelopment and the City's ~~the~~ primary drainage system is provided in the Concurrency and Capital Improvements Element. ***[Moved excerpt to Action PFWRE-1.10.1]***

> **Action PFWR-1.10.1** Level of service standards for surface water management may be reviewed and updated periodically to ensure consistency with the Naples Stormwater Master Plan, as amended, and specific planning studies and master plans related to surface water management (See Objective CCI-1). [1] ~~requires no flooding during a 5-year, 1-hour storm event~~

[1] Amends a portion of Policy 1.10 to include a new policy.

~~for roads, yard drainage, pump stations and trunk lines and requires no flooding during a 100-year storm event for building finished floors elevations:~~

~~Wet Retention Retention~~

~~Best Management Practices (see below)~~

~~Dry Retention~~

~~1.25" Minimum~~

~~Retention~~

~~0.5" Minimum~~ ***[Moved from PFWRE Policy 1-10]***

Policy PFWR-1.11 Stormwater Design and Attenuation Standards

All new development, redevelopment or substantial improvement of platted properties within the City of Naples will be reviewed to assure compliance with local ordinances, design criteria and building code requirements, which include stormwater management systems to be constructed to minimum standards for attenuation and retention or detention including the tailwater condition as noted below.

~~LAND USE~~	~~CONVEYANCE/QUANTITY~~	~~STORAGE/QUALITY~~
~~Single Family~~	~~A~~	~~B~~
~~Multi-Family~~	~~A~~	~~B~~
~~Non-Residential Mixed Use~~	~~A~~	~~B~~

~~Source: City of Naples Stormwater Standards Handbook, July 2007~~

A. Unless otherwise specified by previous ~~South Florida Water Management District (~~SFWMD~~)~~ permits or District criteria, a storm event of 1-hour duration and 5-year return frequency will be used in computing the minimum off-site discharge rates from private properties to the City's stormwater system. The stormwater conveyance system should be designed sufficiently so that the conveyance will pass the design flow while ensuring that the backwater head does not exceed the proposed berms, walls or other containment systems in a 25-year, 24-hour storm event, including the tailwater condition included in Policy PFWR-1.11. The side lot swales and other emergency conveyance facilities may be designed to pass the water forward to the public right-of-way.

B. Unless otherwise specified by previous ~~South Florida Water Management District (~~SFWMD~~)~~ permits or District criteria, water quality standards will be determined based upon selecting the most appropriate pollutant removal presumption to the corresponding BMP technique. The BMP guidelines used must meet a presumed pollutant removal of 85% Total Suspended Solids (TSS), Total Nitrogen (TN), and Total Phosphorus (TP). ~~BMP's that do not effectively remove TN and TP such as "dry detention" will be discouraged~~. Innovative approaches and Low Impact Development (LID) techniques that reduce percent impervious are encouraged. When a retention system is used in conjunction with approved BMP's, a reduction in storage volume may be provided by City of Naples Code Section 16-115. ~~Although reductions in storage volume may be given to BMP's that use "retention" and exfiltration, under no circumstances will the design storage volume be allowed~~

~~to be less than one-half inch (0.5") of retention storage volume nor less than 1.25 inch of dry detention storage volume (based on total site area). The following special conditions will apply in meeting the above standards: a) on single family lots no more than one-half inch of detention or retention will be stored underground in vaults, exfiltration pipes or french drains; b) rainfall runoff from roof drains can be disregarded from the water quality calculations (Goal B) but not from the conveyance calculations (Goal A) since roof water is not a major source of pollutant concern but it is a major concern for release into the public system for flooding considerations. Directly connected impervious area (DCIA) is discouraged for purposed of Goal A; c) retention systems will be designed and located no less than 18 inches above the wet season water table; exfiltration and pervious pavement will be designed to be a minimum of 24 inches above the wet season water tables; d) where special filtering materials are utilized, where swimming pools and patio areas are designed for storage or where special retention provisions are provided consistent with the SFWMD criteria or consistent with Chapter 62 of the Florida Administrative Code, the building official may credit such areas in the computation of total on-site storage.~~

~~Source: City of Naples Stormwater Standards Handbook, July 2007~~

C. Stormwater systems shall be designed to be functional for all tailwater conditions that may be encountered by events equal in frequency to the level of service or by SFWMD, whichever is more stringent. This may entail consideration of storm durations different than the current standard 5 yr-1 hour storm event. Variable tailwater stages should be considered if they have a significant influence on the design. Minimum Tailwater Elevation is required as adopted in the Code of Ordinances and/or the most recent version of the Stormwater Ordinance Standards and/or Handbook, as amended. Applicants may propose alternative tailwater elevations due to site-specific constraints for approval by the City, but should take into account current and future conditions at the receiving water.

Policy PFWR-1.12 Stormwater Best Management Practices Implementation

The City shall implement Best Management Practices to improve stormwater management through implementation of a Stormwater Ordinance and Standards Handbook, as amended, designed to protect adjacent properties from stormwater flooding during and after re-construction and new construction, to function under future tidal conditions, and to improve the quality of stormwater runoff.

Policy PFWR-1.13 Potable and Reclaimed Water System for Fire Flow Demands and System Pressure Standards

Maintain a dual-system network of potable and reclaimed water mains and hydrants to meet current and projected fire flow demands and system pressure standards. (See also Policy PFWR-8.4).

~~BEST MANAGEMENT SELECTION CRITERIA~~

~~The following Best Management Practices are listed as design and operational opportunities for implementation:~~

~~Proposed BMP Selection Credits~~

	Additional BMP Measure Utilized	Proposed Credit	Justification Explanation
1	Common Swale on Joint Lot Line	1.0 SC	Grading disparities between properties and minimal distance between side setbacks result in difficult to construct an efficient storm water treatment system that is difficult to maintain. Any property owner that can negotiate and develop a common swale between two lot lines provides a typically superior to maintain, problem free solution that can remove pollutants with a high efficiency as well as carry on-site storm water in an easier to maintain technique than underground vaults and pipes.
2	Home Roof Drains Connected Directly to Swales or Exfiltration (making roof NDCIA)	1.0 SC	Because of FFE Requirements most new homes are well above the crown of the roadway and driveways have steep slopes where all impervious pollutants drain into Public Right-of- Way with little treatment. Valid techniques, such as pervious concrete, geoblocks, and other innovative landscape architectural techniques that decrease the imperious runoff and allow for some percolation will provide credits.
3	Pervious Driveway Flat (≤2% slope) Med (2% > 5% slope) Steep (≥ 5% slope)	 1.0 SC 0.5 SC 0.0 SC	Driveways that are made of pervious materials that allow percolation will be given BMP credits. Their effectiveness is directly related to driveway slope.
4	Driveway Trench Drain	0.5 SC	The slope of driveways usually does not allow for reverse grading to treat on-site, thus substantial portions of impervious area go to the street untreated. Credit will be given to effective use of intercepting trench drains.

5	Driveway Runoff Collection - "Rain Gardens"	1.0 SC	Most driveways slope toward the roadway and convey runoff directly into the street without providing any treatment. A depressed landscape area located adjacent to the driveway will be encouraged through BMP credits.
6	Loop Driveway Inverted "Rain Gardens" (Instead of raised islands)	1.0 SC	Most looped driveways utilize a raised landscape area that reduces potential treatment area from the very important low portion of the lot where driveways need treatment. A depressed landscape area in these locations will be encouraged through BMP credits.
7	Pool and Deck "Self-Containment" Design	0.5 SC	Designing pool deck area to shed the runoff ack to the pool instead of generating additional storm water runoff will be rewarded with BMP credits.
8	Native Landscaping That Does Not Require Fertilizers/Pesticides	1.0 SC	Landscaping documented to be Florida native species compatible with local native soils will be presumed to not require special watering, fertilizing, and pesticide needs that waste water and generate pollutant runoff thus BMP credits may be assessed.
9	Home Roof Drain Fitted with Rain Barrels	0.5 SC	Most roof drains are connected to the general conveyance of the property to direct the runoff immediately offsite following a storm event. A rain barrel intercepts this runoff to be used for irrigation purposes during times with lower rainfall therein preserving potable water and its use will credit BMP's

Source: City of Naples Stormwater Standards Handbook, July 2007

BMP Credit Applicability			
Cred	Credit Allowance	Credits Required	Justification Explanation

#	Policy		
1	25-Year Storm Freeboard Compliance	12" (as written) 9" 1.0 SC 6" 2.0 SC	
2	Maximum Underground Storage	0.5 "(as written) 2x 1.0 SC 3x 1.5 SC 4x 2.0 SC 5x 2.5 SC	
3	Maximum Exfiltration Estimated Seasonal High Water Table (ESHWT) Freeboard	24" (as written) 18" 0.5 SC 12" 1.0 SC 6" 1.5 SC	
4	Minimum Exfiltration Ground Cover	12" 0 SC (recommended) 6" 0.5 SC 3" 1.0 SC 0" 1.0 SC (under slope)	

Source: City of Naples Stormwater Standards Handbook, July 2007

Objective PFWR-2 Ensure a Safe and Adequate Potable Water Supply

~~On an annual basis, measure the demand for water based on population projections to conserve~~ Conserve, protect, and improve, as needed, the water resources and facilities of the City of Naples to ensure an adequate, resilient, and safe supply for future needs, and to conserve potable water resources~~, and protect the functions of groundwater and aquifer recharge areas~~.

Policy PFWR-2.1 Water Resources Needs Assessment

Identify necessary level of frequency and ~~D~~develop reports accordingly to evaluate water resource needs for determining the impacts of growth on water resources corresponding to the annual measurements.

Policy PFWR-2.2 Water Storage Capacity

~~Evaluate the need to~~ ***[Moved excerpt to Action PFWRE-2.2.1~~~~]~~*** Iincrease raw water supply including alternative water supply sources and treated water storage capacity to accommodate current and future ~~growth~~ demand.

> **Action PFWR-2.2.1** Evaluate the need to increase raw water supply to support projected demand on a regular basis. ***[Moved from PFWRE Policy 2.2]***

Policy PFWR-2.3 Water Distribution System Master Plan

~~Participate in programs to conserve and protect groundwater resources. Develop strategies for conservation of groundwater resources, such as a regional wellfield protection ordinance and program. Every 5 years, update the 20-year Water and Wastewater Master Plans~~ ***[Moved to Policy PFWR-4.2 and PFWR-8.1]*** Update and implement the recommendations in the Water Distribution System Master Plan.

> ~~Policy~~ **Action PFWR-2.~~4~~3.1** Develop a public information program to inform and educate the citizens on water conservation techniques, proper irrigation techniques, water shortage notices and other important issues dealing with valuable water resources.

Policy PFWR-2.~~5~~4 Coordination with the South Florida Management District

Support and participate in the efforts of the South Florida Water Management District in carrying out its legislative mandate to manage and protect water resources.

Policy PFWR-2.~~6~~5 Water Efficiency Measures

Reduce the demand for potable water by encouraging the use of water-saving devices in new commercial and residential development and in the redevelopment or retrofitting of existing structures. Utilize innovative ideas which reduce water consumption, encourage water reuse, and minimize capital expenditure.

Policy PFWR-2.~~7~~6 Waterwise Irrigation and Florida-Friendly Landscaping Standards

~~Encourage the utilization of native vegetation in landscaping to minimize irrigation requirements. Minimize irrigation requirements through the use of native or xeric vegetation for landscaping. Encourage no landscape irrigation between 8:00 a.m. and 12:00 p.m. after the establishment of plantings.~~ Promote water conservation through waterwise irrigation practices and the application of Florida-friendly landscaping practices that utilize non-invasive, drought-tolerant tropical vegetation. Landscape irrigation must comply with the Conservation Regulations in Division 2 of the Code regarding landscape irrigation restrictions.

Policy PFWR-2.~~8~~7 Potable Water Permit Review Coordination

During the ~~five~~ 20-year permit review process, coordinate with the South Florida Water Management District (SFWMD) to identify the anticipated potable water needs of the future population.

Policy PFWR-2.~~9~~8 10-Year Water Supply Facilities Work Plan

~~Coordinate with Collier County to formulate land use development regulations and standards to protect cones of influence around well water pumping sites and sensitive aquifer recharge areas.~~ ***[Moved to Policy PFWR-4.7]*** The City's adopted 10-Year Water Supply Facilities Work Plan is incorporated into the Comprehensive Plan by reference, as amended.

Policy PFWR-2.~~10~~9 Water Supply Facilities Work Plan Maintenance and Updates

~~Monitor water levels and water quality in both the Coastal Ridge wellfield and the East Golden Gate wellfield to determine the Safe Sustained Yield to monitor compliance with the Salt Water Intrusion Monitoring program outlined in the current SFWMD Water Use Permit.~~ ***[Moved to Policy PFWR-4.10]*** The City shall maintain a 10-Year Water Supply Facilities Work Plan (Work Plan) that is coordinated with the South Florida Water Management District's (SFWMD) Lower West Coast (LWC) Water Supply Plan. The Work Plan and related Comprehensive Plan policies will be updated, as necessary, within 18 months of an update to the LWC Water Supply Plan that affects the City, consistent with Section 163.3177, F.S. The Utilities Master Plan shall also be updated to be consistent with the SFWMD Water Supply Plan.

Policy PFWR-2.~~11~~10 Alternative Water Supply Master Planning

~~Abandoned or inoperable wells will be properly plugged.~~[2] As part of a Utilities Master Plan, the City will initiate and implement an alternative water supply system for both potable water and irrigation purposes. This system will include composite well-fields that draw from multiple aquifer sources, including the Lower Tamiami, Upper Hawthorn, and Lower Hawthorn aquifer systems. Utilizing these diversified sources will help ensure that the City's water and wastewater treatment facilities remain resilient and capable of meeting demand during drought conditions.

[2] Deleted obsolete language.

Policy PFWR-2.~~12~~11 Local Water Quality Monitoring Coordination

Support the South Florida Water Management District (SFWMD), Florida Department of Environmental Protection (FDEP), United States Geological Survey (USGS), Florida Governmental Utility Authority (FGUA), and Collier County efforts toward developing a locally administered water quality monitoring program with a unified QA/QC to ensure data collected by different agencies is usable and scientifically valid.

Policy PFWR-2.~~13~~12 Water Withdrawal and Drought Coordination

~~Review existing codes and ordinances dealing with water withdrawal from the Coastal Ridge and East Golden Gate wellfields, in conjunction with Collier County and the South Florida Water Management District, to ensure consistent policies and courses of action during periods of severe drought.~~ ***[Clause beginning with "…ensure consistent policies" moved to Policy PFWR-4.11]*** Implement water restrictions consistent with the rules and any Water Shortage Declarations of the SFWMD and/or as needed sub-regionally in coordination with SFWMD.

~~**Policy 2.14**~~

~~Develop a water shortage conservation program as required as a special condition of consumptive use permits issued by the SFWMD.~~[3]

~~**Policy 2.15**~~

~~Continue to adhere to the Wellfield Management Plan for operation of the wellfields. This plan will spread the points of withdrawal throughout the aquifer to avoid excess drawdown.~~ ***[Moved to Policy PFWR-4.12]***

~~**Policy 2.16**~~ **Policy PFWR-2.~~14~~13**

Evaluate water rates to ensure that they are sufficient to encourage water conservation. The greater the demand, the greater the rate based on a rapid rate step increase method.

~~**Policy 2.17**~~

~~Evaluate alternative water supplies to supplement the reclaimed water irrigation system. This would include storage of surface water and stormwater in Aquifer Storage and Recovery (ASR) wells.~~ ***[Moved to Policy PFWR-4.13]***

[3] Obsolete program deleted.

Objective PFWR-3 Stormwater Management and Flood Resiliency

Prove an efficient, resilient, and effective stormwater management system that reduces hazards to life, health, and property through implementation of ~~Update~~ the Stormwater Master Plan recommendations ~~which sets forth recommendations by which to reduce surface flooding, manage runoff and improve water stormwater quality~~. Infrastructure planning and investment should consider both existing deficiencies and reasonably anticipated future conditions over the useful life of the infrastructure. ***[Moved excerpt to Policy PFWRE-3.13]***

Policy PFWR-3.1 Intergovernmental Watershed Restoration and Flood Mitigation

Pursue intergovernmental ~~cooperation~~ coordination opportunities with Collier County, the South Florida Water Management District, and the Big Cypress Basin to implement projects and programs that restore the historic watershed flows, reduce freshwater impacts to Naples Bay, ~~mitigate flooding~~ and improve stormwater quality.

Policy PFWR-3.2 Public Information and Stormwater Education Program

~~Develop and maintain public information program to i~~Inform the citizens of, and encourage support for, a comprehensive stormwater ~~quality program with emphasis on stormwater retention in swales and lakes~~ ***[Moved excerpt to Action PFWRE-3.2.1]*** management approach that preserves public health, protects property, identifies stormwater as a valuable resource and seeks out ways to conserve, preserve and improve stormwater quality and quantity.

> **Action PFWR-3.2.1** Develop, ~~and~~ annually maintain, and review a public information program to support the City's comprehensive stormwater management approach. ***[Moved from PFWRE Policy 3-2 and edited as shown]***

Policy PFWR-3.3 Citywide Swale Restoration Program

Continue to implement a City-wide swale restoration program, including inspection and maintenance of the design capacity within the right-of-way and landscaped easements.

Policy PFWR-3.4 Stormwater System Inspection and Maintenance

Maintain the City's comprehensive program of major stormwater system inspection and maintenance, including replacing corrugated metal pipe, maintenance of conveyance and collection facilities, cleaning out organic debris and all stormwater components.

> **Action PFWR-3.4.1** To avoid the increasing failure of gravity drainage systems, incorporate future tidal flooding conditions into analyses related to the functionality of the stormwater management system and include tidal flooding assumptions into stormwater project designs and LOS. Additionally, adapt stormwater facilities or harden them to maintain functionality during design flood events.

Policy PFWR-3.5 Lake Water Quality Enhancement Programs

Maintain the City's efforts to work with lakefront property owners to increase dissolved oxygen levels and reduce water temperatures of lakes (stormwater ponds) through technology such as aerators.

> ~~Policy 3.5~~ **Action PFWR-3.5.1** Develop and implement a ~~program of~~ lake ~~evaluation to determine the~~ management program that prioritizes lake restoration and the feasibility of increasing the retention capacity and improving water quality. Lake restoration shall be funded annually through the Capital Improvement Plan.

Policy PFWR-3.6 Clam Bay Water Exchange Coordination

~~Determine if there is a hydraulically efficient way to provide an adequate~~ Continue to work with Collier County and the Pelican Bay Improvement District to review the exchange of water between Clam Bay and Venetian Bay with the goal of improving water quality. The Natural Resources Department will monitor the Clam Bay Committee meetings. ~~and pursue implementation of the Management Plan recommendations of the committee.~~ ***[~~Moved from PFWRE Policy 4.13~~]***

Policy PFWR-3.~~6~~7 Water Retention in Public Works Projects

Encourage water retention and water quality systems on all public works projects, including evaluation of open areas for water retention.

Policy PFWR-3.~~7~~8 Stormwater Best Management Practices in Development

Encourage best management practices for ~~stormwater facilities adopted by the City found in Policy 1-11~~ all development including maximizing green space onsite and minimizing impervious surfaces.

Policy PFWR-3.~~8~~9 Water Quality Program

Implement and fund ~~a lake and bay maintenance and quality program including pollution loading and vegetative aquatic growth consistent with conservation and coastal management policies~~ a water quality monitoring and sampling program for stormwater systems to receiving water bodies.

Policy PFWR-3.~~9~~10 Stormwater Maintenance Requirements for Private Development

~~Insure~~Ensure that private development integrates ~~water quality and quantity features to~~maintenance plans for stormwater management lakes.

Policy PFWR-3.~~10~~11 Consistency with Basin-Wide Master Drainage Plans

Include in individual land development plans stormwater runoff systems that are compatible with basin-wide master drainage plans.

Policy PFWR-3.~~11~~12 Illegal Discharge Review and Response Procedures

~~The City will work inter-departmentally to determine goals and policies for~~ Maintain the City's interdepartmental review and response process that ensures immediate and complete

response to illegal and illicit surface water ~~clean up to include water filtration systems around the City, in coordination with Collier County~~ discharges.

Policy PFWR-3.~~14~~13 Stormwater Master Plan Implementation and Updates

~~Update the~~ Initiate development of a Comprehensive Stormwater Master Plan consistent with the Stormwater Ordinance and Stormwater Utility Governance Documents. The Master Plan shall ~~which sets forth recommendations~~ include initiatives and projects ~~by which~~ to reduce surface flooding, ~~manage runoff and~~ enhance development regulations, expand public education and information, improve ~~water~~ stormwater quality, and enhance system reliability for changing hydrologic conditions forecast for the next 20+ years. ***[Moved from PFWRE Objective 3]***

> **Action PFWR-3.13.1** Update the Comprehensive Stormwater Master Plan every five years, incorporating the 20-year planning horizon. ***[Moved from PFWRE Objective 3]***

Policy PFWR-3.14 Coordinate Data Collection and Analysis Efforts

Coordinate the City's public facilities, stormwater and floodplain management data collection and analysis efforts to better coalesce efforts around flood risk and response and leverage opportunities to improve participation in FEMA's Community Rating System Program.

Objective PFWR-4 Protect Groundwater and Aquifer Recharge Areas

Protect groundwater supplies in the aquifer and recharge areas from those activities having the potential for depleting or degrading those supplies. ~~Reduce freshwater impacts to receiving waterbodies including Naples Bay, Moorings Bay and the Gulf of Mexico. Reduce anthropogenic impairments to receiving waterbodies including nutrients, copper and bacteria below criteria set by the Florida Department of Environmental Protection and accepted by the City.~~ ***[Moved excerpt to Policy PFWRE-4.1]***

Policy PFWR-4.1 Reduction of Freshwater Impacts to Receiving Waters

~~Every 5 years, update the 20-year Water and Wastewater Master Plans.~~ Reduce freshwater impacts to receiving waterbodies including Naples Bay, Moorings Bay and the Gulf ~~of Mexico~~. Reduce ~~anthropogenic~~ impairments to receiving waterbodies ~~including nutrients, copper and bacteria~~ below criteria set by the Florida Department of Environmental Protection and accepted by the City. ***[Moved from PFWRE Objective 4 and revised as noted]***

Policy PFWR-4.2 Groundwater Conservation and Wellfield Protection Programs

~~Continue efforts to eliminate effluent discharge into the Gordon River from the wastewater treatment plant through the expansion of the reclaimed water distribution system and innovative programs.~~ ***[Moved to Policy PFWR-8.2]*** Participate in programs to conserve and protect groundwater resources. Develop strategies for conservation of groundwater resources, such as a regional wellfield protection ordinance and program. ***[Moved from PFWRE Policy 2-3]***

Policy PFWR-4.3 Surface Water Drainage and Containment Reduction

Improve surface water drainage facilities with new technologies that reduce contaminant loading in lakes and bays.

Policy PFWR-4.4 NPDES Implementation and Stormwater Monitoring

Continue to implement National Pollutant Discharge Elimination System (NPDES) objectives including efforts to identify and educate non-point pollution sources about stormwater discharges and, where appropriate, monitor stormwater discharges.

Policy PFWR-4.5 Regulation of Water-Oriented Development Activities

Regulate water-oriented development activities, such as dredging, filling, and soil deposition, to minimize water quality degradation.

Policy PFWR-4.6 Environmentally Responsible Land Use and Wastewater Practices

Encourage environmentally compatible and responsible land use practices and wastewater disposal techniques that result in minimal point source discharge to surface and ground water.

Policy PFWR-4.7 Protection of Wellfield Cones of Influence and Recharge Areas

~~Continually study and consider the feasibility of alternative combinations of sludge processing and sludge utilization techniques for satisfactory and economical disposition of quantities of residual waste.~~ ***[Moved to Policy PFWR-8.3]*** Coordinate with Collier County to formulate land

use development regulations and standards to protect cones of influence around well water pumping sites and sensitive aquifer recharge areas. ***[Moved from PFWRE Policy 2-9]***

Policy PFWR-4.8 Stormwater as an Alternative Water Supply

Recognize stormwater as an alternative water supply for the replenishment of groundwater resources and other non-potable uses.

Policy PFWR-4.9 Implementation of Reuse Feasibility Studies and Master Plans

Implement recommendations from any current or future Reuse Feasibility Study or Master Plans.

Policy PFWR-4.10 Wellfield Monitoring and Saltwater Intrusion Compliance

~~Continue to coordinate with Collier County on hazardous waste disposal.~~ ***[Moved to PFWR-5.7]*** Monitor water levels and water quality in both the Coastal Ridge wellfield and the East Golden Gate wellfield to determine the Safe Sustained Yield to monitor compliance with the Salt Water Intrusion Monitoring program outlined in the current SFWMD Water Use Permit. ***[Moved from PFWRE Policy 2-10]***

Policy PFWR-4.11 Drought Response and Water Withdrawal Coordination

~~Continue to reuse treated wastewater for the irrigation of golf courses and other suitable areas. Abandoned or inoperable wells will be properly plugged.~~ ***[Moved to Policy PFWR-8.4]***

~~Review existing codes and ordinances dealing with water withdrawal from the Coastal Ridge and East Golden Gate wellfields, in conjunction with Collier County and the South Florida Water Management District, to e~~ ***[Moved to Action PFWR-4.11.1]*** Ensure consistent policies and courses of action during periods of severe drought. ***[Moved from PFWRE Policy 2-13]***

> **Action PFWR-4.11.1** Review existing codes and ordinances dealing with water withdrawal from the Coastal Ridge and East Golden Gate wellfields, in conjunction with Collier County and the South Florida Water Management District, to address potential drought conditions. ***[Moved from PFWRE Policy 4-11]***

Policy PFWR-4.12 Wellfield Management Plan Compliance

~~Establish a pilot program through the City's Natural Resources Division to test various devices that will increase oxygen through aeration. Water quality will be monitored during the pilot program. If the pilot program proves successful, a system-wide program will be designed and implemented. The program will include funding alternatives~~.[4] Continue to adhere to the Wellfield Management Plan for operation of the wellfields. This P~~p~~lan will spread the points of withdrawal throughout the aquifer to avoid excess drawdown. ***[Moved from PFWRE Policy 2-15]***

Policy PFWR-4.13 Alternative Water Supply and Aquifer Storage Recovery

~~Determine if there is a hydraulically efficient way to provide an adequate exchange of water between Clam Bay and Venetian Bay with the goal of improving water quality. The Natural Resources Department will monitor the Clam Bay Committee meetings and pursue~~

[4] Obsolete program deleted.

~~implementation of the Management Plan recommendations of the committee.~~ ***[Moved to Policy PFWR-3.6]*** Evaluate alternative water supplies to supplement the reclaimed water irrigation system. This would include storage of reclaimed water, surface water and stormwater in Aquifer Storage and Recovery (ASR) wells. ***[Moved from PFWRE Policy 2-17]***

Policy PFWR-4.14 Support Collier County's Well-Head Protection Ordinance

Continue to support Collier County's Well-Head Protection Ordinance designed to protect both Collier County Water-Sewer District (CCWSD) and City well-fields.



Objective PFWR-5 Monitor and Manage Solid Waste Disposal

~~On a monthly basis, continue~~Continue to evaluate the quantity of solid waste materials that the City of Naples deposits in the Collier County sanitary landfill. (See Action IC-2.1.2 in Intergovernmental Coordination Element.)

Policy PFWR-5.1 Authorized Solid Waste Disposal Methods

Permit solid waste disposal only in authorized sanitary landfills, or by incineration, recycling, or other methods approved by Collier County and the City of Naples.

Policy PFWR-5.2 Separation and Recovery of Reusable Materials

Promote and encourage new methods for the separation of reusable material from solid wastes.

Policy PFWR-5.3 Flexible Solid Waste Management Practices

Provide a flexible solid waste management program so as to incorporate efficient and newer techniques whenever available.

Policy PFWR-5.4 Recycling Education Coordination with Schools

Work with the Collier County Solid Waste Department to coordinate recycling education for schools in the City.

Policy PFWR-5.5 Recycled Goods Procurement Policy

Implement a recycled goods procurement policy within City government offices which will include, at a minimum, office paper products including letterheads, copy paper, and business cards.

Policy PFWR-5.6 Recycling Promotion and Source Reduction Education

Expand recycling promotion and education emphasizing source reduction.

Policy PFWR-5.7 Hazardous Waste Disposal Coordination

Continue to coordinate with Collier County on hazardous waste disposal. ***[Moved from PFWRE Policy 4-10]***

Objective PFWR-6 Coordination of Electric Utility Distribution

Coordinate with Florida Power & Light (FPL) to ensure that adequate, resilient, electrical facilities are available to meet the needs of the existing and future residents of the City of Naples.

~~Policy 6.1 Evaluate the feasibility of phasing in the under grounding of utilities over a ten-year period.~~ ***[Moved to Action 6.1.1]***

Policy PFWR-6.~~2~~1 Standards for Underground Electric Infrastructure

All electrical distribution facilities, except main feeder lines, serving new growth and redevelopment, will be placed underground except where it is not economically, technically, or operationally feasible. The installation of associated aboveground appurtenances, such as cable risers and pedestals, pad mounted transformers and switch gear, meters, and the like, necessary for the operation of underground systems should be permitted.

> ~~Policy~~ Action PFWR-6.1.1 Evaluate the feasibility and desirability of phasing in the under grounding of utilities over a ten-year period. ***[Moved from PFWRE Policy 6-1]***

Policy PFWR-6.~~3~~ 2 Siting Standards for Electric Substations

New and existing electric substations, including accessory administration or maintenance buildings and related accessory uses and structures, will not be placed in areas designated preservation, conservation or historic preservation, but shall be permitted in all other land use categories and zoning districts.

Policy PFWR-6.~~4~~ 3 Design Standards for Electric Substation Facilities

Ensure that electric substations are designed and developed to be as aesthetically pleasing as ~~is~~ economically and technologically feasible through the implementation of land development regulations addressing setbacks, landscaping, buffering, screening, lighting, and other compatibility-based standards, consistent with F.S. Section 163.3208.

Policy PFWR-6.~~5~~ 4 Electric Utility Planning for Present and Future Needs

Support efforts by the electrical ~~companies~~ company to plan for present and future needs of the City in an economical and reliable manner.

Policy PFWR-6.5 Storm Recovery Coordination with Florida Power & Light

Enhance coordination and information sharing with Florida Power and Light (FPL) throughout storm recovery response and other flood risk analysis to account for future tidal flooding conditions.



Objective PFWR-7 Promote Energy Efficiency and Conservation

To reduce energy costs of taxpayers and property owners, ~~Require~~ encourage the efficient use of energy in the City of Naples and promote general, community-wide energy consciousness and conservation policies.

Policy PFWR-7.1 Building Code Regulations for Energy Efficiency

Promote efficient energy consumption to reduce City budgetary costs through proper building code regulations and their enforcement.

Policy PFWR-7.2 Public Building Energy Efficiency Requirements

~~Require~~ Design all public buildings ~~to be designed~~ to minimize energy needs and costs, and support energy-efficient standards.

Policy PFWR-7.3 Innovative Design and Materials for Energy Reduction

Encourage innovative architectural and engineering designs and building materials that reduce energy ~~consumption~~costs for City buildings and private property owners.

Policy PFWR-7.4 Energy-Conscious Site Design and Orientation

To increase homeowner affordability, ~~E~~encourage builders to site houses on lots so as to take advantage of the prevailing winds, angle of sun, existing trees, and the like.

Policy PFWR-7.5 Energy-Efficient Landscaping Practices

Encourage the use of ~~native drought-resistant~~ "Florida Friendly" plant species that supports diverse, non-invasive vegetation in housing developments and shopping centers where such vegetation reduces energy consumption for irrigation or maintenance requirements.

Policy PFWR-7.6 Research and Utilization of Renewable Energy Sources

To reduce property operating expenses, ~~P~~promote the research and utilization of ~~alternate and~~ renewable and sustainable energy sources, such as solar power options, including encouraging floating solar facilities as defined in Section 163.32051, F.S, when planning facility improvements (See also the Public Facilities and Water Resources Element, Policy PROS-2.4).

Policy PFWR-7.7 Energy Conservation Education and Code Enforcement

Support education programs to inform citizens of the necessity for, and benefits of, energy conservation in homes, businesses, and industries, and enforce applicable energy codes which will result in efficient lowered use and cost of energy.



Objective PFWR-8 Provide Cost-Effective and Environmentally Responsible Sanitary Sewer Service

Provide cost-effective, resilient, and efficient sanitary sewer service while protecting the environment and public health.

Policy PFWR-8.1 Sanitary Sewer and Wastewater Master Planning

~~Every 5 years, update the 20-year Water and~~ Implement a Sanitary Sewer /Wastewater Master Plan~~s~~ to identify infrastructure improvements and adaptation needs over the next 20-year planning horizon. ***[Moved from PFWRE Policy 2-3 and revised as noted]***

> **Action PFWR-8.1.1** Implement the septic tank replacement program in the City's sanitary sewer service area, where financially feasible.

Policy PFWR-8.2 Wastewater Effluent Reduction and Reclaimed Water Expansion

Continue efforts to eliminate effluent discharge into the Gordon River from the wastewater treatment plant through the expansion of the reclaimed water distribution system and innovative programs. ***[Moved from PFWRE Policy 4-2]***

Policy PFWR-8.3 Sludge Utilization and Disposal Strategies

Continually study and consider the feasibility of alternative combinations of sludge processing and sludge utilization techniques for satisfactory and economical disposition of quantities of residual waste. ***[Moved from PFWRE Policy 4-7]***

Policy PFWR-8.4 Reclaimed Water Utilization

Continue ~~to reuse treated wastewater~~utilizing reclaimed water for firefighting needs and ~~the~~ irrigation ~~of~~ wherever practicable, including golf courses and other suitable ~~areas~~landscapes. [***Moved from PFWRE Policy 4-11 and revised as noted]*** (See also Policy PFWR-1.13).

~~WATER SUPPLY FACILITIES WORK PLAN~~

~~SUB-ELEMENT TO THE PUBLIC FACILITIES AND WATER RESOURCES ELEMENT~~[5]

~~1.0 INTRODUCTION~~

~~The purpose of the City of Naples Water Supply Facilities Work Plan (Work Plan) is to identify and plan for the water supply sources and facilities needed to serve existing and new development within the local government's jurisdiction. Chapter 163.3177(6)(c)(3), F.S., requires local governments to prepare and adopt Work Plans into their comprehensive plans within 18 months after the water management district approves a regional water supply plan or its update. The Lower West Coast Water Supply Plan Update was approved by the South Florida Water Management District (SFWMD) on December 14, 2017.~~

~~The City of Naples Water Supply Facilities Work Plan (Work Plan) will reference the Integrated Water Resources Plan and the development of the Alternative Water Supply improvements since 2008. The 20-year Integrated Water Resources Plan was adopted by resolution on October 1, 2008. According to State Statutes, the Work Plan and the comprehensive plan amendment must address the development of traditional and alternative water supplies and conservation and reuse programs that are necessary to serve existing and new development for at least a 10-year planning period.~~

~~The City's Work Plan is divided into five sections:~~

~~Section 1 - Introduction~~

~~Section 2 - Background Information Section 3 - Data and Analysis~~

~~Section 4 - Work Plan Projects/Capital Improvement Element/Schedule Section 5 - Goals, Objectives, Policies~~

~~1.1 Statutory History~~

~~The Florida Legislature enacted bills in the 2002, 2004, 2005, 2011, 2012, 2015 and 2016 sessions to address the state's water supply needs. These bills, in particular Senate Bills 360 and 444 (2005 legislative session), significantly changed Chapters 163 and 373, F.S., by strengthening the statutory links between the regional water supply plans prepared by the water management districts and the comprehensive plans prepared by~~

[5] The Water Supply Facilities Work Plan has been incorporated by reference under Objectives PFWR-1 and PFWR-2 in this Element.

~~local governments. In addition, these bills established the basis for improving coordination between local land use planning and water supply planning.~~

~~1.2 Statutory Requirements~~

~~Each local government must comply with the following requirements:~~

~~1. Coordinate appropriate aspects of its comprehensive plan with the South Florida Water Management District's regional water supply plan, [163.3177(4)(a), F.S~~]

~~2. Ensure that its future land use plan is based upon availability of adequate water supplies and public facilities and services [s.163.3177(6)(a)(2)(d), F.S. Data and analysis demonstrating that adequate water supplies and associated public facilities will be available to meet projected growth demands must accompany all proposed Future Land Use Map amendments submitted to the Department for review.~~

~~3. Ensure that adequate water supplies and potable water facilities are available to serve new development no later than the issuance by the local government of a certificate of occupancy or its functional equivalent and consult with the applicable water supplier to determine whether adequate water supplies will be available to serve the development by the anticipated issuance date of the certificate of occupancy [s.163.3180(2), F.S.~~

~~4. For local governments subject to a regional water supply plan, revise the General Sanitary Sewer, Solid Waste, Drainage, Potable Water, and Natural Groundwater Aquifer Recharge Element (the "Infrastructure Element"), within 18 months after the water management district approves an updated regional water supply plan, to:~~

~~a. Identify and incorporate the alternative water supply project(s) selected by the local government from projects identified in the updated regional water supply plan, or the alternative project proposed by the local government under s. 373.709(8)(b), F.S.;~~

~~b. Identify the traditional and alternative water supply projects, and the conservation and reuse programs necessary to meet current and future water use demands within the local government's jurisdiction [s. 163.3177(6)(c), F.S~~]~~; and~~

~~c. Update the Work Plan for at least a 10-year planning period for constructing the public, private, and regional water supply facilities identified in the element as necessary to serve existing and new development [s. 163.3177(6)(c)3, F.S~~].

~~5. Revise the Five-Year Schedule of Capital Improvements to include any water supply, reuse, and conservation projects and programs to be implemented during the five-year period.~~

~~6. To the extent necessary to maintain internal consistency after making changes described in Paragraph 1 through 5 above, revise the Conservation Element to assess projected water needs and sources for at least a 10-year planning period, considering the appropriate regional water supply plan and the applicable District Water Management Plan [s.163.3177 (6)(d), F.S~~]~~. The plan must address the water supply sources necessary to meet and achieve the existing and projected water use demand for the established planning period, considering the applicable regional water supply plan [s.163.3167(9), F.S~~].

~~7. To the extent necessary to maintain internal consistency after making changes described in Paragraphs 1 through 5 above, revise the Intergovernmental Coordination Element to ensure coordination of the comprehensive plan with applicable regional water supply plans and regional water supply authorities' plans.~~

~~8. While an Evaluation and Appraisal Report is not required, local governments are encouraged to comprehensively evaluate, and as necessary, update comprehensive plans to reflect changes in local conditions. The evaluation could address the extent to which the local government has implemented the need to update their Work Plan, including the development of alternative water supplies, and determine whether the identified alternative water supply projects, traditional water supply projects, and conservation and reuse programs are meeting local water use demands [s.163.3191 (3), F.S].~~

~~2.0 BACKGROUND INFORMATION~~

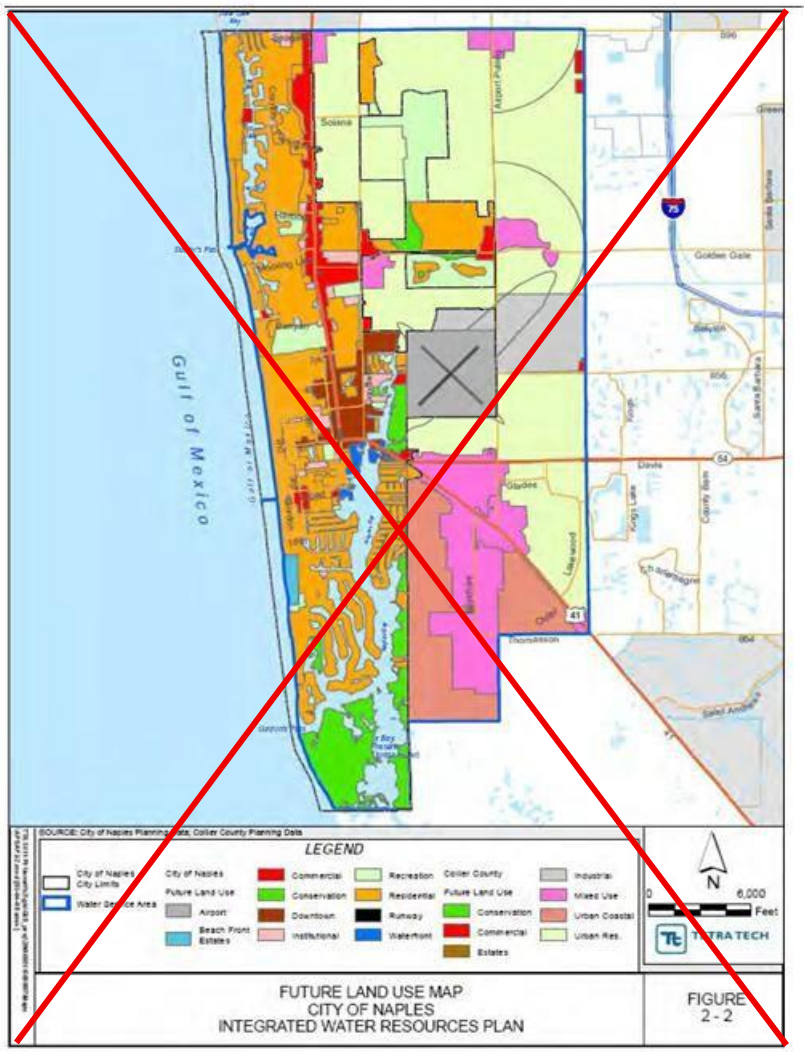
~~2.1 Overview~~

~~The City of Naples consists of approximately 15 square miles of territory located on the eastern coast of the Gulf of Mexico approximately forty miles south of Fort Myers, Florida. The existing water and wastewater service areas include the entire City limits and some portions of Collier County. Both service areas are bounded to the west by the Gulf of Mexico and are bounded by the City limits on the south side of the service area. The northern boundary of both service areas is located along the northern City limits south of Pine Ridge Road. The eastern boundary of the water service area is Livingston Road outside of the City limits. The water service area encompasses approximately 33 square miles of land area. The existing wastewater service area encompasses approximately 18.6 square miles.~~

~~The City services primarily residential land uses and service oriented commercial and light industrial lands. The predominant type of land use in the County service area is residential with some light commercial uses. A joint water agreement between the City and Collier County designates the ultimate City water service area. The following table represents land use within the water service area.~~

Water Service Area Land Use Description	Area (ac)		
Airport	650		
Beach Front Estates	54		
Commercial	576		
Conservation	863		
Downtown	394		
Institutional	212		
Recreational	812		
Residential (City)	**4,168**	→	**24% of Service Area**
Urban Residential (County)	**6,254**	→	**36% of Service Area**
Urban Coastal (County)	**1,272**	→	**7% of Service Area**
Mixed Use (County)	**1,604**	→	**9% of Service Area**
Estates (County)	6		
Industrial (County)	687		
Waterfront (County)	62		
Total	**17,614**	**Acres**	

~~For the water service area, residential land use accounts for 60% of the land use. The largest land use is the County's Urban Land Use category which accounts for 36% of the service area land use, and the second largest land use is the City's Residential Land Use category which accounts for 24% of the service area land use. The next largest land use categories are the County's Urban Coastal and Mixed Use which together account for 16% of the service area land use. Overall, the majority of land within the water service area is located outside of the City limits; land within the County accounts for 56% of the total land within the service area while land within the City limits accounts for 44% of total land within the wastewater service area. The following figure illustrates the land use within the City's service areas.~~



Map date 12/2017

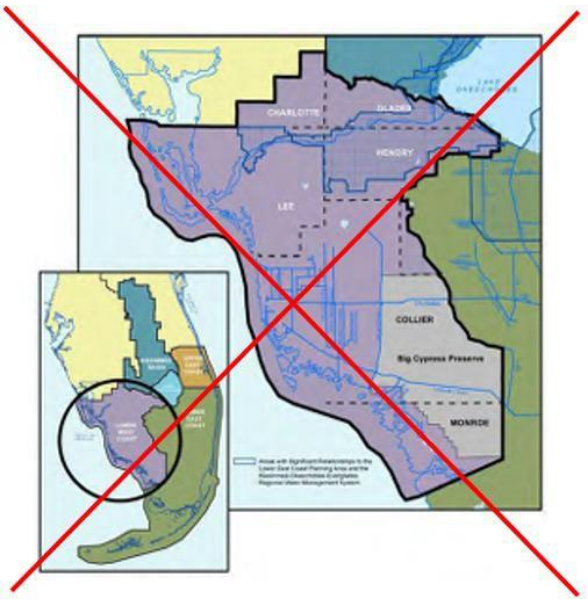
~~Naples offers a high quality of life exemplified by cleanliness, safety, well- maintained homes and businesses, distinctive architecture, tree-lined streets, landscaped medians, a high level of municipal services, environmental corridors, pristine beaches, and tropical climate. In addition to these assets, the mix and location of residential, commercial, institutional, and recreational land uses within a neo-traditional framework fosters the small town character and charm.~~

~~To remain a premier City and offer a high quality of life, the City's resources need to be protected, managed, and used in a manner that assures, to the highest degree possible, a way to preserve and enhance the quality of life for current City residents and future generations.~~

~~One of these most important and vital resources are its water supply and delivery system. In order to safeguard this indispensable public necessity for the present and~~

future residents of Naples service area, the City has expanded its alternative water supply sources to meet projected demands. The alternative water supply options included expansion of the reclaimed water system, Golden Gate canal water, storm water, and storage of these waters by aquifer storage and recovery.

In order to provide a framework for the affected governmental agencies to comply with the Legislature's enactment, the Florida Department of Economic Opportunity has prepared a set of guidelines and a map of the South Florida Water Management District that indicates the regional planning area. The City of Naples is situated within the Lower West Coast water management district.



Lower West Coast Water Supply Plan 2017 - Location of the City of Naples

2.1 Relevant Regional Issues

As the state agency responsible for water supply in the Lower West Coast planning area, the South Florida Water Management District (SFWMD) plays a pivotal role in resource protection, through criteria used for Consumptive Use Permitting.

In June 2008, the City adopted the Integrated Water Resources Plan to identify water supply needs and sustainable water supply sources for a 20-year planning period. Existing water supply needs within the City's water service area are met with the surficial aquifer in the East Golden Gate and Coastal Ridge well fields withdrawing from the lower Tamiami aquifer. Alternative water supply use includes reclaimed water, fresh water from the Golden Gate Canal and recovered water from the Aquifer Storage and Recovery

~~(ASR) system which has primarily been used to meet golf course, commercial and residential irrigation water demands. Expansion of the reclaimed water distribution system was completed in 2017.~~

~~3.0 DATA AND ANALYSIS~~

~~3.1 Population Information~~

~~This year the South Florida Water Management District provided the population projections which reduced the previously published population projections in the 2008 Integrated Water Resources Plan. The City's future population figures are derived from the Collier County Metropolitan Planning Organization. The Collier County Metropolitan Planning Organization prepares population estimates broken down by Traffic Analysis Zones (TAZs), based upon 2010 U.S. Department of Census and Bureau of Economic and Business Research (BEBR) estimates and projections. The City, and the attendant Water Service Area, do not exhibit extreme growth trends. The majority of growth within the Water Service Area results from infill development and re-development projects. Therefore, the extreme growth that characterizes, much of Southwest Florida is not seen in the City of Naples. It is nevertheless the case that some growth does occur, and that seasonal growth is exhibited in the various population models used to project demographics in the City's Water Service Area.~~

~~Because southwest Florida is a popular tourist destination, seasonal population will be considered when calculating projections. The population projections developed under this planning assignment are shown later in section 3.4.1 and take into account both the permanent and seasonal populations. As of 2016, the total population for the Water Service Area was 71,372. The City's service area population is expected to rise by approximately 21,000 by the year 2040.~~

~~3.2 Maps of Current and Future Areas Served~~

~~The following map illustrates the City's water service area.~~



~~Utility service areas as per 2009 Interlocal Agreement~~

~~There are no areas within the City's water service area that are domestic self-supply systems (private wells). The City extended the water distribution system to Bembury Drive in 2015 that provided city water to approximately 15 properties.~~

~~3.3 Potable Water Level of Service Standard~~

~~The City's adopted level of service is 300 gallons per capita day based on plant wellfield design capacity. The water treatment plant currently meets this design LOS with a design capacity of 30 mgd and a population of 71,372 for the year 2016. When the population is at a peak during the months of February, March and April the rainfall is at a minimum and there is additional demand for irrigation water.~~

~~Since the expansion of the reclaimed water distribution system to residential areas the total water demand has dropped. Based on the population projection through 2040 and anticipation of the future expansion of the reclaimed water distribution system, the projected water demand is estimated at 208 gpcd. The potable water demand for 2014 is 204 gpcd based on the population projection and the actual potable water production. The actual potable water production for 2015 indicates a water demand of 194 gpcd.~~

~~Flow reduction over the past five years is due to expansion of the reclaimed water distribution system. It is anticipated that potable water demands will continue to decrease based on future expansion of the reclaimed water distribution system. Flow projections will be updated with the actual annual flow data.~~

~~The table in section 3.4.1 illustrates the current and projected potable water demand for the next 25-years.~~

~~The 2008 Integrated Water Resources Plan provided a plan for meeting the City's potable water needs through 2028. The plan indicates three alternatives to supply that demand. The selected alternative will include a combination of the reclaimed water to residential customers and potable water from a brackish water supply. The 5-year plan places an emphasis on expanding the reclaimed irrigation system to residential customers before expanding the potable water plant with brackish water supply. The 5-year plan includes installing 4 ASR wells at the Riverside Circle location to store excess reclaimed water and water from the Golden Gate Canal. Water from the Golden Gate Canal will be used to supplement the irrigation system. The stored water in the 4 ASR wells will be used to supplement the irrigation system during the dry season which is typically during the months of March through May and provide an adequate water supply to expand the reclaimed water system. The final phase of the reclaimed water distribution system was completed in 2017. The Golden Gate Canal pump station and the 4 ASR wells were completed in previous years of the 5-year plan.~~

~~3.4 Population and Potable Water Demand Projections by Each Local Government or Utility~~

~~3.4.1 PROJECTED WATER DEMAND~~

~~The figure below shows the projected water demand, not including existing reclaimed water irrigation demand for the City of Naples.~~

~~POTABLE WATER DEMANDS~~

~~Year~~
~~Population~~
~~GPCD Average Day (MGD) Max Day (MGD)~~
~~2014 69,397 205 14.26 18.67~~
~~2015 70,385 197 13.89 17.45~~
~~2016 71,372 197 14.09 17.66~~
~~2017 72,360 195 14.17 17.91~~
~~2018 73,348 195 14.30 18.16~~
~~2019 74,335 195 14.50 18.41~~
~~2020 75,323 195 14.71 18.66~~

~~2021 76,161 196 14.92 18.91~~
~~2022 77,000 196 15.12 19.16~~
~~2023 77,838 197 15.33 19.41~~
~~2024 78,677 197 15.53 19.66~~
~~2025 79,515 198 15.74 19.91~~
~~2026 80,353 198 15.95 20.16~~
~~2027 81,192 199 16.15 20.41~~
~~2028 82,030 199 16.36 20.66~~
~~2029 82,869 200 16.56 20.91~~
~~2030 83,707 200 16.77 21.16~~
~~2031 84,384 201 16.97 21.41~~
~~2032 85,061 202 17.18 21.66~~
~~2033 85,737 203 17.38 21.91~~
~~2034 86,414 204 17.59 22.16~~
~~2035 87,091 204 17.79 22.41~~
~~2036 87,768 205 17.99 22.66~~
~~2037 88,445 206 18.20 22.91~~
~~2038 89,122 207 18.41 23.16~~
~~2039 89,799 207 18.61 23.41~~
~~2040 90,475 208 18.81 23.66~~

~~Table revised 1/2018~~

~~3.4.2 Total Potable and Irrigation Water Demand~~

~~The City's plan to meet the increased reclaimed water irrigation demand includes a combination of wastewater treatment plant effluent and water from the Golden Gate Canal. The plan places an emphasis on expanding the reclaimed irrigation system to residential customers prior to expanding the potable water plant. This plan included installing four ASR wells at the Riverside Circle location to store excess reclaimed water and water from the Golden Gate Canal. The stored water in the four ASR wells is utilized to supplement the reclaimed water irrigation system during the dry season when the Golden Gate Canal is too low, and its use is prohibited. The dry season typically during the months of March through May.~~

~~Over the past seven (7) years, the City implemented the alternative water supply plan to convert irrigation demand to the reclaimed water distribution system. Through this conversion, the total potable water demand has been reduced as illustrated in the Potable Water Demand table in section 3.4.1.~~

~~As part of the adoption of the 2013 Water & Sewer Rate Study in May 2014, City Council authorized a three-year expansion plan of the reclaimed water transmission system within the northwestern section of the City's water distribution identified as the area of highest potable water demand.~~

~~Since the beginning of the reclaimed water system expansion in 2008 potable water consumption has reduce by approximately 3.5 MGD annual daily average. In 1984, the historical per capita water demand was as high as 372. Based upon the revised population projections, the 2017 potable water demand was 195 gpcd.~~

~~After the transmission system expansion is completed in 2017, City Council will evaluate the possibility of future reclaimed system distribution expansion within the residential side streets of this area. This information is illustrated in the Potable Water Demand table in section 3.4.1 above.~~

~~3.5 Water Supply Provided by Local Government~~

~~The City of Naples owns and operates a water treatment plant that is permitted by the Florida Department of Environmental Protection (FDEP) under PWS ID 5110198. The plant is a 30 MGD lime softening plant with filtration and chloramine disinfection.~~

~~3.5.1 Water Use Permit (WUP) Information~~

~~The City of Naples withdraws groundwater from the Lower Tamiami Aquifer in quantity described in Water Use Permit (WUP) No. 11-00017-W with an expiration date of June 23, 2030. The annual allocation of the WUP is 6,724 million gallons of fresh water from the Lower Tamiami Aquifer with a maximum monthly allocation not to exceed 685.2796 million gallons. The annual water consumption for 2017 was 5174.88 million gallons with a maximum monthly consumption of 539.44 million gallons that occurred in March 2017.~~

~~The City of Naples withdraws surface water from the Golden Gate Canal to supplement the reclaimed water distribution system and/or store in the ASR wells located at the Wastewater Treatment Plant. WUP No. 11-03205-W issued on May 9, 2011 provides an annual allocation of 10 million gallons per day of water from the Golden Gate Canal. This permit expires on May 9, 2031.~~

~~The City of Naples withdraws surface water from the Golden Gate Canal to supplement the reclaimed water distribution system and/or store in the ASR wells located at the Wastewater Treatment Plant. WUP No. 11-03205-W issued on May 9, 2011 provides an annual allocation of 10 million gallons per day of water from the Golden Gate Canal. This permit expires on May 9, 2031.~~

~~3.5.2 Raw Water Supply~~

~~The raw water supply is provided by two wellfields located within Collier County. The primary wellfield is the East Golden Gate wellfield located approximately 20-miles east of the City of Naples. This wellfield is made up of 23 wells with submersible pumps capable of producing 500 - 1,000 gallons per minute (per well). The secondary wellfield is the Coastal Ridge wellfield located approximately 1.5 miles east of the coastline. This wellfield is made up of 31 wells with submersible pumps capable of producing 350 gallons per minute (per well). The following Figures have been provided to illustrate the location of the City's current well fields.~~


CR 858
31ST AVE NE
29TH AVE NE
27TH AVE NE
RANDALL BLVD
24TH AVE NE
18TH AVE NE
16TH AVE NE
14TH AVE NE
8TH AVE NE
6TH AVE NE
4TH AVE NE
2ND AVE NE
GOLDEN GATE BLVD E
8TH AVE SE
10TH AVE SE
20TH AVE SE
EVERGLADES BLVD N
EVERGLADES BLVD S
DESOTO BLVD
Miles
LEGEND
East Golden Gate Wellfield
Abandoned
On-line
Proposed
To Be Abandoned
City of Naples
City Limits
N
Feet
TETRA TECH
EAST GOLDEN GATE WELLFIELD MAP
CITY OF NAPLES
INTEGRATED WATER RESOURCES PLAN
FIGURE
3 - 3



Figure Revised 2018

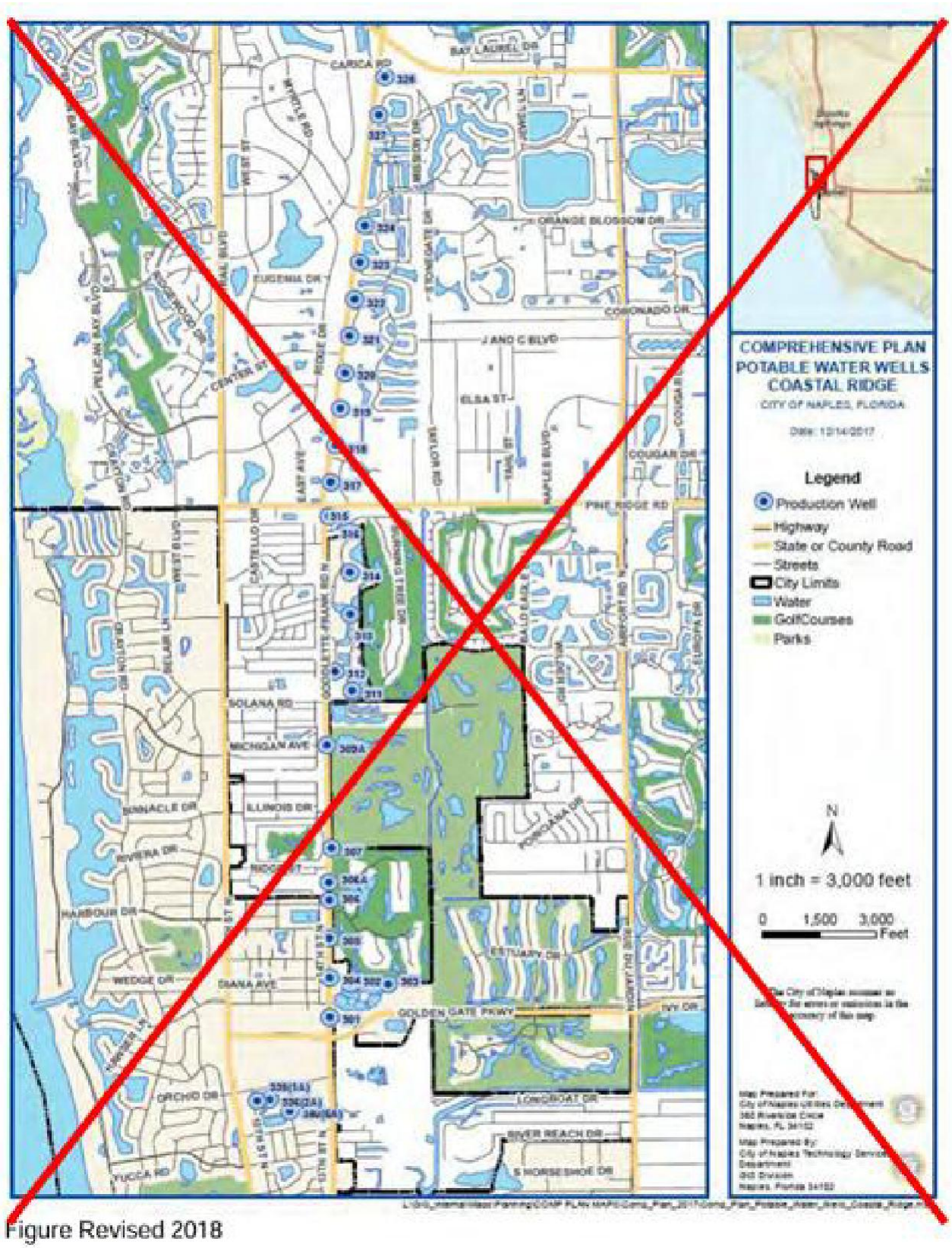


Figure Revised 2018

~~3.5.3 Water Distribution System~~

~~The City maintains three hundred twenty-six (326) miles of water main pipeline to distribute water throughout the service area. The water mains and service lines vary in size, depending upon the service area and demand. Water pressure is maintained between twenty (20) and eighty (80) pounds per square inch. The City has a thirteen (13) million-gallon treated water storage capacity at three (3) remote locations within the water service area. These sites are the Port Royal Water Storage tank, East Naples Water Storage tank and the Solana Road Water Storage tank.~~

~~The Port Royal tank site was renovated to accommodate larger pumps and an emergency generator. This renovation was completed in April 2001. The installation of the reclaimed water distribution system in Port Royal has shifted the irrigation demand from the potable water system to the reclaimed water system which has increased the potable water pressure in the area.~~

~~In 2011 the City upgraded the East Naples and Solana Road water storage tank sites to provide greater pumping capacity and improved emergency generator systems.~~

~~The City's hydraulic analysis was updated in 2012 as part of a on preliminary design report prepared for expansion of the reclaimed water distribution system. Fire flow analysis indicated several areas within the City's water distribution system that were below the required 1,000 gpm. Since the analysis, the City's has increased fire flow protection by adding loop lines and increasing the size of water distribution mains and providing fire hydrants on the existing reclaimed water distribution mains. In 2016, the City completed a $5-million upgrade of the water distribution system located in the Royal Harbor area within the City.~~

~~In 2015, the City provided potable water service to the Bembury subdivision. This area was the only area within the City's water/sewer service area previously on private shallow water supply wells.~~

~~3.5.4 Emergency Potable Water Interconnects~~

~~In 2002, the City of Naples and Collier County entered into an Interlocal agreement to construct and co-own two (2) potable water interconnects. These connections are used only for emergency purposes.~~

~~3.5.5 Integrated Water Supply Plan~~

~~3.5.5.1 Background~~

In 2008 the Integrated Water Resources Plan (IWRP) was developed for the City of Naples to identify water needs, water supply options and funding requirements during a twenty-year planning period The Integrated Water Resources Plan considers water supply as a whole

including potable and irrigation needs, and to ensure that the current CIP as it relates to water supply takes into consideration changes in construction costs, water treatment technology, population trends and environmental conditions.

3.5.5.2 Water Supply Needs

Based on the 25-year population projections, the City will require a water supply capacity of 18.81 million gallons per day (MGD) in 2040. The City's existing lime softening water treatment facility can supply up to 30 MGD of capacity. With the expansion of the reclaimed water distribution system, the Capacity of the water treatment plant should be sufficient to meet the potable water demands during the 25-year planning period.

3.5.5.3 Alternatives Evaluated

The 2008 Integrated Water Resources Plan evaluated ten alternatives to meet the projected 25-year water supply needs. All new water supply sources proposed met the criteria established by the South Florida Water Management District (SFWMD) for an Alternative Water Supply. New water supply sources that do not meet the Alternative Water Supply designation would be subject to shorter consumptive use permit durations and more stringent water restrictions during drought periods.

All available water supply sources within the City of Naples were considered in the evaluation. Capital costs were developed for alternatives which were considered feasible based on water quality and quantity available. For potable water supply, these potential sources included brackish groundwater from the lower Hawthorn aquifer and sea water from the Gulf of Mexico. For irrigation water supply, potential new sources included the Golden Gate Canal supplemented with storm water. Water from the Gordon River or Naples Bay was considered in the plan, but due to the variability in quantity and quality these sources were not considered feasible alternatives.

After evaluation of the alternatives, City Council directed that a 5-year, $20 million Capital Improvement Project concentrate on the development of alternative water supplies to expand the reclaimed water irrigation system to water customers within the corporate limits of the City.

The 5-year plan included the construction of four ASR wells located at the site of the City's wastewater treatment facility at Riverside Circle and construction of an intake and transmission main from the Golden Gate Canal to the City's wastewater treatment

~~facility. Treated effluent and water from the Golden Gate Canal will be stored in the ASR wells during the wet season to supplement the irrigation system during the dry season. Water from the Golden Gate canal will supplement the irrigation system directly as demand dictates. Finally expand the reclaimed water distribution system to reduce the use of potable water for irrigation needs.~~

~~The 5-year plan has been completed with exception of the final phase of the reclaimed water expansion which will be completed in 2017. ASR well #4 construction was completed in 2016. Cycle testing was completed at the end of 2017.~~

~~3.5.5.4 Financial Evaluation~~

~~The City's consultant completed a Water and Sewer Rate Study for the City in 2013. The study recommended various rate increases to meet the specific needs of the system. The water and wastewater rate recommendations that were approved by the City Council included only annual CPI increases of 2.0% over the next 10 years. Reclaimed water rates reduced slightly. Reclaimed water rates included a $20 per month base charge based on meter size. This rate modification will maintain revenues necessary to continue capital improvements of the utility system for the next 10-years.~~

~~The 2013 Water and Sewer Rate Study will be updated in 2018 as part of an evaluation of the City's current potable water demands to provide City Council with options for future expansion of the reclaimed water distribution system.~~

~~3.5.5.5 City Council Support~~

~~At a City Council workshop on June 2, 2008, the recommendations found in the Integrated Water Resources Plan were presented to the Naples City Council. During the workshop, the City Council gave staff a strategic direction, and stressed that the Integrated Water Resources Plan should be a living document that is updated regularly. The strategic direction included development of alternative water supply and storage to increase reclaimed water use for irrigation, then proceed with the development of additional brackish water supply for potable water use. These items are listed below in order of importance to the Council.~~

~~1. Aquifer storage and recovery for stormwater/surface water~~

~~2. Golden Gate Canal water supplemented by storm water~~

~~3. Brackish groundwater for potable water use~~

~~This strategic direction fits within the recommended capital improvements for alternative 2 (as described previously). However, by giving ASR and the Golden Gate Canal a higher priority than brackish groundwater, the Council sought to leave open the possibility of expanding these resources further and reducing the quantity of brackish groundwater required in the future. This strategy is somewhat of a hybrid between alternatives 2 and 3 in that it seeks to minimize use of brackish groundwater if ASR is~~

successful but recognizes the need to develop a brackish groundwater supply for the future. The City Council requested that City staff provide an annual update on the program, and that the recommendations in the report be updated by an outside consultant every three to five years. The City of Naples Integrated Water Resources Plan is located on the City's website at www.naplesgov.com under the Utilities Department.

The City Council continues to support the alternative water supply program by ranking alternative water supply projects eligible for District grant funding.

With the completion of the final phase of the reclaimed water system expansion, city staff will update the 2013 Water, Sewer, and Reclaimed Water Rate Study to justify future system expansion. Staff will present expansion options to City Council to consider future expansion of the system in 2018.

3.6 Water Supply Provided by Other Entities

No other entities supply water within the City of Naples service area.

3.7 Conservation

"Although our population is continuing to grow, increasing the demand for water, the overall supply available is limited. Most of our drinking water is replenished by rainfall, which gradually makes its way to underground aquifers. But even when rain is scarce, we need that high quality water for drinking, cooking or bathing.

Using drinking-water quality water for our lawns wastes a precious resource. Yet, for most of Florida's history, potable water has been used for almost everything, because few imagined that someday more than 7 million people would be living in the region, and millions more visiting.

That's why we are encouraging utilities, businesses and communities to make the best possible use of every drop of water they use, and where possible, reusing water."

-my.sfwmd.gov

3.7.1 County-wide Issues

In addition, the City has taken a proactive approach in seeking alternative water supplies in order to meet irrigation demands. These alternatives have been covered in Section 3.5.5 (Integrated Water Resources Plan).

3.7.2 Local Government Specific Actions, Programs, Regulations, or Opportunities

The City will coordinate future water conservation efforts with the SFWMD to ensure that proper techniques are applied. In addition, the City will continue to support and expand existing goals, objectives and policies in the comprehensive plan that promote water conservation in a cost-effective and environmentally sensitive manner. The City will continue to actively support the SFWMD in the implementation of new regulations or programs that are designed to conserve water during the dry season.

3.7.2.1 Potable Water Rate Structure

~~To conserve potable water used for irrigation, the City implemented a potable water rate structure to promote the South West Florida Water Management District's conservation initiatives. Potable water rates include a 4-tier inverted block rate. As potable water consumption exceeds the block range (i.e., the allowable volume of water at the lowest dollars/1000 gallons) the cost of water increases as each block is exceeded. The 2013 Water and Sewer Rate Study modified rates and fees to conform to industry practice and provide fair and equitable distribution of costs. The water rates maintained a 4-tier inverted block rate as a conservation measure and reduced water and sewer system development charges (impact fees). The water rates include meter base charges to provide cost of potable water availability. The 4-tier inverted block rate for sprinkler meters was modified to eliminate the first tier which is the lowest cost water. Sprinkler meters now have a 3-tier block rate. The potable water rates will be adjusted annually by CPI.~~

~~The 2013 Water and Sewer Rate Study included base charges for reclaimed water meter service based on meter size. The reclaimed water base charge will ensure that revenues are sufficient to maintain capital improvements to the utility system for the next 10-years. Reclaimed water rates were modified to provide two rate classes for bulk users, those with on-site lake storage and those without that use the City's pressure to operate their irrigation systems. The third-rate class are for general customers.~~

~~3.7.2.2 Sewer Service Rate~~

~~The City of Naples rate structure for sewer service includes a 10,000- gallon monthly cap for each single-family dwelling. The cap does not apply if an irrigation meter, sub-meter, or reclaimed water meter serves the property. Therefore, customers that own an irrigation meter or have the availability to reclaim water will pay additional sewer service fees for potable water usage that exceeds the 10,000-gallon monthly cap. This initiative has been incorporated into the rate structure and fees in an effort to continue to promote water conservation for the meter that services the residence or dwelling.~~

~~3.7.2.3 Year-Round Irrigation Restrictions~~

~~On July 14, 2014, the South Florida Water Management District adopted Mandatory Year-Round Landscape Irrigation Conservation Measures under FAC 40E-24. The South Florida Water Management District added this Rule to place state wide irrigation restrictions on all water users. The intent and purpose of this Rule is to protect the water resources from the harmful effects of over-utilization by prohibiting landscape irrigation during periods of high evaporation and prohibiting the operation of irrigation systems in a manner causing water to be wasted. Section 30-68 of the City of Naples Code of Ordinances includes year-round landscape irrigation restrictions.~~

~~3.8 Reclaimed Water~~

~~In 2016, the City of Naples supplied 2,018 MG of reclaimed water to the reclaimed water customers for irrigation purposes for an annual average day use of 5.67 MGD. The average reclaimed water use for the last eight years was 5.51 MGD. The reclaimed water not used by the existing reuse customers is pumped into the City's ASR system or~~

discharged to the Gordon River. The City's first ASR well was constructed in 2011. The current ASR well system has a total of three operating wells within the wastewater treatment plant property. ASR well #4 was completed in 2016. Since 2012, 53-million gallons of treated effluent (reclaimed water) has been discharged to the Gordon River. During 2014 and 2015, no treated effluent was discharged to the Gordon River. Effluent discharges to the Gordon River may occur during rainy season as reclaimed water irrigation demands reduce.

The final phase of a three-year reclaimed water system expansion was completed in 2017. This three-year expansion provides alternative water service to approximately 430 residential customers. The City is in the process of expanding its reclaimed water system in order to provide irrigation water to more customers to reduce the overall demand of the potable water. The chloride concentration of the reclaimed water has been an issue with many residents within the City who are concerned with the water quality affecting their plants. The average chloride concentration in the reclaimed water in 2007 was approximately 600 mg/L. Infiltration of ground water into the gravity sewer system in areas close to the Gordon River and the Gulf of Mexico is suspected for the increased chloride concentration in the reclaimed water. Annually the City is in the process of lining portions of the gravity sewer system and lift stations that are suspected of causing the elevated chlorides in order to remediate the water quality of the treated water. Lining the gravity sewer mains and sewer laterals has reduced the chloride level in the reclaimed water system to approximately 200 mg/L. Lining the gravity sewer mains has proven to be a very successful preventative maintenance element to saltwater inflow/infiltration into the sanitary sewer system. To further alleviate the public concern of high chloride concentration in the reclaimed water, City Council required chloride levels to be less than 400 mg/L. Chloride concentrations in the reclaimed water have not exceeded this limit.

In October 2012, the City began supplementing its reclaimed water system with fresh water from the Golden Gate Canal. A pump station and pipeline were constructed and are currently providing additional fresh water resources to meet the peak irrigation demands as well as providing water for injection into the ASR system.

3.8.1 Regional and County-wide Issues

State law supports reclaimed water efforts. For the past years, Florida's utilities, local governments, and water management districts have led the nation in implementing reclaimed water programs that increase the quantity of reclaimed water used and public acceptance of reuse programs. Section 373.250, F.S., provides that water reuse programs designed and operated in compliance with Florida's rules governing reuse are deemed protective of public health and environmental quality. In addition, Section 403.064, F.S., provides that encouragement and promotion of reuse of reclaimed water has been established as a state objective.

The City of Naples supports reclaimed water initiatives under consideration by both the South Florida Water Management District (SFWMD) and Florida Department of Environmental Protection Agency (FDEP).

~~3.8.2 Local Government Specific Actions, Programs, Regulations, or Opportunities~~

~~The City will support the SFWMD and Collier County water reuse projects, and implementation of new regulations or programs designed to increase the volume of reclaimed water used and public acceptance of reclaimed water.~~

~~In 2006, the City of Naples completed a sanitary sewer master plan for the City of Naples Unsewered Service Area. The plan identified seven areas for installing City sewer. Due to the location of the seven areas identified, the scope of the project was broken down into two phases. Phase 1 of the project consisted of 1,306 single family lots and 104 Multi-family housing groups including commercial lots. Phase 2 of the project identified 50 single family lots.~~

~~Based on the number of units within the seven areas identified within the plan, the predicted influent flow is estimated at approximately .33 million gallons per day (MGD). The additional wastewater has a potential to become a source of additional reclaimed water which will result in a reduction in potable water used for irrigation.~~

~~The following pages contain maps that illustrate the locations of the seven specific areas identified within the City's Unsewered Master Plan.~~

~~Unsewered Area 1 is located in the northern section of the project boundary, south of Pine Ridge Road. residential lots are located on Milano Drive, Lastrada Lane, Pompei Lane, Cortina Court, and Napoli Drive north of Woodridge Avenue.~~

~~Unsewered Area 2 is located in northern section of the project area, three blocks south of Unsewered Area 1. The area contains residential and commercial lots located between North Alhambra Circle and Morningside Drive.~~

~~Unsewered Area 3 is located in the middle of the project area. The area contains residential and commercial lots located between Solana Road and Hemingway Place.~~

~~Unsewered Area 4 is located directly south of Unsewered Area 3. The area contains residential and commercial lots located between Hollygate Lane and Wisconsin Drive.~~

~~Unsewered Area 5 is located south of Unsewered Area 4. The area contains residential and commercial lots located between Ridge Street and Creech Road.~~

~~Unsewered Area 6 is located directly south of Unsewered Area 5. The area contains residential lots located on Rordon Street.~~



Unsewered Area 7 is located southeast of the Project Area 1. The area is located east of Goodlette-Frank, north of Bembury Drive, and south of 14th Avenue North. The area contains residential lots.



~~City sewer installations will be implemented based on a petition process initiated by the neighborhoods and City Council approval. Funding for the City sewer installations is programmed to be handled on an assessment basis.~~

In 2015, the sanitary sewer system construction was completed in Area 7 better known as Bembury. Funding for the sewer installation was done by special assessment.

In 2016, the City and Collier County entered an interlocal agreement to design and construct a sanitary sewer system to replace existing septic tanks along with County stormwater improvements. This project area is in Areas 4 and 5 as shown in the illustration above. This project will provide sanitary sewer service to approximately 374 residential units. Funding for the sewer installation will be accomplished through a special assessment.

4.0 CAPITAL IMPROVEMENTS

The final phase of the reclaimed water system expansion was completed in 2017. In 2018, city staff provided City Council with options for future expansion of the reclaimed water system. The presentation will include an update to the 2013 Water, Sewer, and Reclaimed Water Rate Study to justify future system expansion. City Council adopted the 2018 Reclaimed Water Expansion Plan that describes a 5-year plan to expand the reclaimed water distribution system into residential areas from the previous 3-year expansion project.

4.1 Work Plan Projects

The Work Plan includes the following:

- All public, private, and regional water supply projects and programs necessary to serve the City of Naples, including development of traditional and alternative water supply sources and reuse will be evaluated. For each project, information will identify the source of water, amount of raw water withdrawn, amount of finished water produced, and if it was identified in the SFWMD regional water supply plan.
- The list of projects including reclaimed transmission or distribution mains and any other capital infrastructure.

4.2 Capital Improvements Element/Schedule

The work plan identifies and addresses:

- All public, private, and regional water supply facilities needed within the jurisdiction.
- All public and private projects and programs necessary during the next five years to achieve and maintain adopted level of service standards and reflect the identified projects and programs in the City's Five-Year Schedule of Capital Improvements. This work plan addresses the costs of capital improvements, the funding source, populations to be served and the construction timeline.
-

~~5.0 GOALS, OBJECTIVES AND POLICIES~~

~~The following comprehensive plan goals, objectives, and policies (GOPs) have been reviewed for consistency with the Work Plan. New GOPs to be adopted and existing GOPS to be revised are identified below.~~

~~a. Coordination of land uses and future land use changes with the availability of water supplies and water supply facilities;~~

~~b. Revision of potable water level of service standards for residential and non-residential users;~~

~~c. Provision for the protection of water quality in the traditional and new alternative water supply sources;~~

~~d. Revision of priorities for the replacement of facilities, correction of existing water supply and facility deficiencies, and provision for future water supply and facility needs;~~

~~e. Provision for conserving potable water resources, including the implemen- tation of reuse programs and potable water conservation strategies and techniques including additional ASR wells;~~

~~f. Provisions for improved or additional coordination between a water supply provider and the recipient local government concerning the sharing and updating of information to meet ongoing water supply needs;~~

~~g. Coordination between local governments and the water supply provider in the implementation of alternative water supply projects, establishment of level of service standards and resource allocations, changes in service areas, and potential for annexation;~~

~~h. Coordination of land uses with available and projected fiscal resources and a financially feasible schedule of capital improvements for water supply and facility projects;~~

~~i. Additional revenue sources to fund water supply and facility projects;~~

~~j. Coordination with the respective regional water supply plan;~~

~~k. Update the Work Plan within 18 months following the approval of a regional water supply plan;~~

~~l. Concurrency requiring water supplies at the building permit stage; and~~

~~m. Encourage, where feasible to eliminate septic tanks within the City's sewer service area.~~

~~5.1 Aquifer Storage and Recovery (ASR) Program~~

~~The goal of the ASR program is to provide cost effective storage of supplemental irrigation water supply during dry weather conditions. The Utility intends to maximize the use of ASR at the Riverside Circle location in order to meet system irrigation demands during the dry season when irrigation water supply sources such as surface water may not be available.~~

~~Goal:~~

~~To provide cost effective storage of reclaimed water and surface water from the Golden Gate Canal during the dry season.~~

~~Objective:~~

~~To evaluate the possibility of additional ASR wells within the Underground Supply of Drinking Water (USDW) to store reclaimed water and surface water from the Golden Gate Canal.~~

~~Action / Strategies~~

- ~~Complete operational cycle testing of ASR well #4 as required by Florida Department of Environmental Protection UIS construction permit.~~
- ~~Obtain UIC operating permit for ASR well #4.~~

~~5.2 Expansion of the Reclaimed Water Distribution System~~

~~The goal of this program is to expand the reclaimed water transmission system to additional residential areas within the water service area identified in the 2012 Preliminary Engineering report prepared by Weston & Sampson Consultants.~~

~~Goal:~~

~~To provide the alternative water supply to other areas within the City's potable water service area as approved by City Council.~~

~~Objective:~~

~~To construct the reclaimed water transmission/distribution system expansion to further reduce potable water consumption.~~

~~Action / Strategies~~

- ~~Update the 2013 Water and Sewer Rate Study to determine financial options for system expansion.~~
- ~~Update the 2012 Preliminary engineering Report prepared by Weston & Sampson Consultants to provide expansion area options in 2018.~~

~~5.3 Update of the Water Supply Facilities Work Plan~~

~~Goal:~~

~~To maintain consistency with the South Florida Water Management District Plan.~~

~~Objective:~~

~~Update the City's Work Plan within 18-months after update and amendments to the District's Lower West Coast Water Supply Plan Updates are approved.~~

~~5.4 Update of the Water Supply Facilities Work Plan~~

~~Goal:~~

~~To maintain consistency with the South Florida Water Management District Plan.~~

~~Objective:~~

~~Update the City's Work Plan within 18-months after update and amendments to the District's Lower West Coast Water Supply Plan Updates are approved.~~



8 TRANSPORTATION ELEMENT

In this Section:

Introduction

Goal, Objectives, Policies, and Actions

INTRODUCTION

1. Section 163.3177(6)(b), Transportation Element of the Community Planning Act, requires that there be:

> A transportation element addressing mobility issues in relationship to the size and character of the local government. The purpose of the transportation element will be to plan for a multimodal transportation system that places emphasis on public transportation systems, where feasible. The element will provide for a safe, convenient multimodal transportation system, coordinated with the future land use map or map series and designed to support all elements of the comprehensive plan. A local government that has all or part of its jurisdiction included within the metropolitan planning area of a metropolitan planning organization (M.P.O.) pursuant to § 339.175 must prepare and adopt a transportation element consistent with this subsection. Local governments that are not located within the metropolitan planning area of a M.P.O. will address traffic circulation, mass transit, ports, and aviation and related facilities consistent with this subsection, except that local governments with a population of 50,000 or less will only be required to address transportation circulation. The element will be coordinated with the plans and programs of any applicable metropolitan planning organization, transportation authority, Florida Transportation Plan, and Department of Transportation adopted work program.
>
> Each local government's transportation element will address traffic circulation, including the types, locations, and extent of existing and proposed major thoroughfares and transportation routes, including bicycle and pedestrian ways. Transportation corridors, as defined in s. 334.03 may be designated in the transportation element pursuant to s. 337.273. If the transportation corridors are designated, the local government may adopt a transportation corridor management ordinance. The element will include a map or map series showing the general location of the existing and proposed transportation system features and will be coordinated with the future land use map or map series. The element will reflect the data, analysis and associated principles and strategies relating to:
>
> a. The existing transportation system levels of service and system needs and the availability of transportation facilities and services.
>
> b. The growth trends and travel patterns and interactions between land use and transportation.

~~c. Existing and projected intermodal deficiencies and needs.~~

~~d. The projected transportation system levels of service and systems needs based upon the future land use map and the projected integrated transportation system.~~

~~e. How the local government will correct existing facility deficiencies, meet the identified needs of the projected transportation system, and advance the purpose of this paragraph and the other elements of the comprehensive plan.~~

The **Transportation Element** establishes the goals, objectives, policies and actions that guide the planning, development, operation, and maintenance of a safe, convenient, efficient, resilient and interconnected multimodal transportation system that supports the land use patterns and future growth of the City over the 20-year planning horizon. This Element supports the mobility needs of residents, businesses, and visitors and movement of goods through an integrated transportation network of roadways, public transit, bicycle and pedestrian facilities, freight mobility, and aviation. The intent is to promote a balanced transportation system that enhances accessibility, improves safety, and supports economic development and quality of life.

This Element is prepared in accordance with the requirements of Florida Statutes Chapter 163 Part II (Community Planning Act), which requires the establishment of Level of Service (LOS) standards for transportation facilities and establishes policies to ensure that development and redevelopment are coordinated with the availability of adequate transportation infrastructure and services. The Element further supports the implementation of concurrency management and capital improvement planning to address existing and future transportation needs.

The Transportation Element also recognizes the importance of transportation system resiliency in the face of natural hazards, extreme weather events, and long-term environmental changes. Transportation planning and infrastructure investments will consider strategies that enhance system reliability, protect critical transportation corridors, and improve the community's ability to prepare for, respond to, and recover from disruptive events such as tidal flooding, storm surge, and hurricanes to the extent practicable. The City will not be able to protect against every hazard condition, but coordination with stormwater management planning, evacuation route planning, and infrastructure design practices will support the long-term resilience of the transportation network.

~~The~~ Because the City of Naples is within the urbanized area of the Collier Metropolitan Planning Organization (MPO), it is ~~and therefore~~ subject to the requirements of Florida Statutes Section 163.3177(6)(b)(2). The Transportation Element promotes coordination with regional and state transportation plans, including those prepared by the Florida Department of Transportation and the MPO. Transportation investments are linked with the Future Land Use, Concurrency and Capital Improvements, and Intergovernmental Coordination Elements to support infrastructure investment, reduce congestion, and improve connectivity throughout the community.

~~2. Naples (Collier County) Metropolitan Planning Organization.~~

~~As required by Florida Statutes, Collier Metropolitan Planning Organization (MPO) was created in March 1982, as a result of an interlocal agreement between the City of Naples, Collier County, and the Florida Department of Transportation. The intent of the MPO is to establish policy for the coordination of the transportation planning process for Collier County and prioritize the allocation of Federal, State, and local funds for multimodal transportation improvements.~~

~~There are nine voting members on the MPO: two from the Naples City Council, one from the City of Marco Island, one from Everglades City and five from the Collier County Board of County Commissioners. Staff from Cities, County, regional, and State government agencies provide technical assistance to the MPO through a Technical Advisory Committee.~~

~~The MPO's comprehensive review of transportation planning efforts in the urban area results in an annual "Unified Planning Work Program," a "Transportation Plan," a "Transportation Improvement Program," and a Long-Range Transportation Plan.~~

~~It is the intent of this element to review and comment on existing plans and policies; to identify existing and potential problems and deficiencies; and to suggest general policy commitments that will lead to effective, consistent, and coordinated traffic- oriented decisions and improvements. The following is intended to provide the City with a general direction in which to move and with a set of parameters within which to work in its continuing effort to improve traffic circulation and various related activities in the City. For purposes of transportation planning, the City's 10-year planning timeframe and 25-year planning timeframe will be coordinated with the Collier MPO.~~

GOAL, OBJECTIVES, ~~AND~~ POLICIES, AND ACTIONS

The following goal~~s~~, objectives, ~~and~~ policies, and actions address ~~the~~ short- and long-range transportation issues ~~concerning the provision of an adequate~~ of a safe, efficient, resilient, and sustainable multimodal transportation circulation system that enhances mobility, accessibility and quality of life within~~for~~ the City of Naples.

~~The goal and the objectives and policies~~ The goal, objectives, ~~and~~ policies, and actions are consistent with ~~goals~~ general policies ~~proposed or~~ adopted by Collier County, the Southwest Florida Regional Planning Council and the State of Florida, ~~to ensure that the City's planning efforts will be compatible with~~ensuring coordination and compatibility between the City's transportation planning efforts and broader local, regional, and state plans ~~for~~ promoting a safe, efficient, and connected multimodal transportation ~~system~~network.

GOAL

Provide ~~an efficient, balanced, attractive, and safe~~ a multimodal transportation system ~~of transportation facilities in accordance with recognized safety standards, various land use demands and~~ that is resilient, efficient, balanced, safe, and visually attractive, while aligning with diverse land use patterns and community transportation needs. The system should promote environmental ~~considerations unique to~~ sustainability, enhance community well-being and quality of life for residents, and respect the distinctive character of the City of Naples.



Objective T-1 Protect Community Character

Protect the character of existing and future residential neighborhoods by maintaining the integrity of the City's transportation infrastructure and promote alternative modes of transportation in an effort to better manage the movement of people and freight to protect residential neighborhoods.(See also Objective FLU-6 in the Future Land Use Element.)

Policy T-1.1 Protection of Residential Neighborhoods

Evaluate and regulate all proposed ~~street improvements~~ development projects in the City that ~~may potentially~~ increase ~~through~~ traffic volumes, ensuring levels of serve are maintained, and ~~to protect~~ residential neighborhoods are protected.

> ~~**Policy 1-12**~~ **Action T-1.1.1** Examine the feasibility of developing alternatives for improving public safety, multimodal transportation options, and parking along, within and around U.S. 41 through the downtown redevelopment area consistent with the Naples Downtown ~~Circulation and Mobility Study completed in 2017~~ Traffic Study. ***[Moved from TE Policy 1-12]***

Policy T-1.2 Landscape Buffers & Linear Parks

Require landscape buffers or linear parks between residential neighborhoods and arterial roadways through ~~linear parks and Code of Ordinances provisions~~implementation of land development regulations.

Policy T-1.3 Safe and Efficient Multimodal Access and Mobility

~~Maintain Level of Service (LOS) C peak hour volume for all roadways based on the 100th hourly volumes design, except Fifth Avenue South between U.S. 41 and Gulf Shore Boulevard, which has been defined as a "constrained facility." For County maintained roads (Goodlette-Frank Road and Golden Gate Parkway) within the City limits, the City shall adopt Level of Service E. For State roads within City limits, (U.S. 41 [S.R. 45 & S.R. 90]), the City shall adopt LOS E.~~ Continue cooperation with the Florida Department of Transportation and Collier County to address property access locations (curb cuts), sidewalks, bicycle lanes, crosswalks, median cuts, and acceleration and deceleration lanes to allow for safe and efficient control of multimodal access and mobility. ***[Moved from TE Policy 1-7]*** (See also Policy FLU-1.9 in the Future Land Use Element.)

Policy T-1.4 Enhancing Resident Safety

~~Enhance traffic flow on roadways by applying intelligent transportation systems and coordinating traffic signals to efficiently move multimodal and emergency response uses of the transportation system.~~ ***[Moved to T-4.3]*** Due to impacts on traffic and aesthetics, the City shall not permit construction of vehicle road overpasses or flyovers in favor of feasible alternative solutions that will improve the long- term multimodal traffic circulation patterns in the City and the safety of its residents. ***[Moved from TE Policy 1-10]***

Policy T-1.5 Right-of-Way and Easement Preservation for Public Safety

Regulate rights-of-way and public easements so that the public's current and future uses for those easements and rights-of-way are preserved with the highest levels of public safety in mind and in accordance with the City's Public Right- of-Way Construction Standards Handbook.

~~**Policy 1.6**~~

~~Continue to operate and improve traffic flow with computerized signalization of selected traffic signals along U.S. 41 and other key roads and intersections.~~[1] Why Deleted?

~~**Policy 1.7**~~

~~Continue cooperation with the Florida Department of Transportation and Collier County to address property access locations (curb cuts), sidewalks, bicycle lanes, crosswalks, median cuts, and acceleration and deceleration lanes to allow for safe and efficient control of multimodal access and mobility.~~ ***[Moved to Policy T-1.3]***

~~**Policy 1.8**~~

~~Require, through the Code of Ordinances, the provision of safe and convenient on-site traffic flow and traffic capacity as a primary criterion for review of Planned Developments, site plan reviews and other land development applications.~~ ***[Moved to Policy T-2.1]***

~~**Policy 1.9**~~

~~Annually consider the appropriation of funds within the five- year Capital Improvement Program budget to address traffic calming and Complete Streets projects as recommended by staff and approved by the City Council. In addition, explore alternative sources of financing to overcome potential shortfalls in transportation funding.~~ ***[Moved to Action T-5.5.1]***

~~**Policy 1.10**~~

~~Due to impacts on traffic and aesthetics, the City shall not permit construction of vehicle road overpasses or flyovers in favor of feasible alternative solutions that will improve the long- term multimodal traffic circulation patterns in the City and the safety of its residents.~~ ***[Moved to Policy T-1.4]***

~~**Policy 1.11**~~

~~Manage future impacts on the community from the Golden Gate Parkway interchange and overpass through traffic diversion and other approaches.~~[2] Why Deleted?

~~**Policy 1.12**~~

[1] Language deleted based on PAB recommendation.
[2] Language deleted based on PAB recommendation.

~~Examine the feasibility of developing alternatives for improving public safety, multimodal transportation options, and parking along, within and around U.S. 41 through the downtown redevelopment area consistent with the Naples Downtown Circulation and Mobility Study completed in 2017.~~ ***[Moved to Action T-1.1.1]***

~~Policy 1.13~~

~~A Transportation Concurrency Exception Area (TCEA) is an urban area delineated by a local government where infill and redevelopment are encouraged, and where exceptions to the transportation concurrency requirement are made, providing that alternative modes of transportation, land use mixes, urban design, connectivity, and funding are addressed. The City of Naples does not currently have a TCEA; however, if the City decides to designate a TCEA, a Comprehensive Plan amendment shall be required. The data and analysis to support the TCEA will be provided in conjunction with such a Plan amendment.~~ ***[Moved to Policy T-2.2]***

~~Policy 1.14~~

~~Public transit facilities are exempt from concurrency management requirements found in the Comprehensive Plan. Public transit facilities are defined in Section 163.3180 (4)(b) F.S.~~ ***[Moved to Policy T-8.3]***





Objective T-2 Transportation and Land Use Coordination

~~Undertake special traffic studies on an annual basis to identify and quantify traffic conditions within various neighborhoods. The traffic studies will be coordinated with~~ Coordinate the transportation system with the adopted Future Land Use Map to ensure that existing and proposed population densities, housing and employment patterns and land uses are consistent with the transportation mobility modes and services proposed to serve these areas. (See also the Generalized Future Land Use subsection and Policy FLU-1.1 in the Future Land Use Element.) ~~The City's annual traffic counting programs, monthly counts and quarterly counts, are posted on the City's website within 30 days of completing the periodic traffic counts; additionally, historic data for the period 1995 to the current period is posted for public review and use.~~[3] KEEP

Policy T-2.1 Required Traffic Criterion for Application Review

~~Based on the special traffic studies, strive to develop a more efficient transportation network that encourages the diversion of traffic from local streets to collectors and arterials. Recommend physical improvements which will be coordinated with the Five-Year Capital Improvements Program.~~ ***[Moved to Objective T-5]*** Require, through the Code of Ordinances, the provision of safe and convenient on-site traffic flow and traffic capacity as a primary criterion for review of Planned Developments, site plan reviews and other land development applications. ***[Moved from TE Policy 1-8]***

[3] Removed based on PAB recommendation.

Policy T-2.2 Option to Designate a Transportation Concurrency Exception Area (TCEA)

~~Participate in the development and review, particularly with the development of elements outlined below, of all long-range plans of the Florida Department of Transportation and the Collier Metropolitan Planning Organization (MPO); and incorporate all recommendations which are consistent with the City's plans. Work with the FDOT and MPO to resolve any recommendations which are inconsistent with City plans. Program elements for close review and coordination include but not limited to the following as applicable to the City of Naples:~~

~~a) Transportation Model updates and validation.~~

~~b) Zonal data used in the revision and/or modification of traffic analysis zones.~~

~~c) Multi-Modal Transportation systems. See Map Series in Support Document.~~

~~d) Transit Service systems.~~

~~e) Technological Transportation systems.~~

~~f) Emergency response systems.~~

~~g) Congestion management systems.~~

~~h) 10-year Transit Plan.~~

~~i) Average Annual Daily Traffic (AADT) Volumes and Levels of Service Conclusions.~~

~~j) 10-year transportation model needs assessments and needs improvements.~~

~~k) 25-year transportation model needs assessments and needs improvements.~~

~~l) 10-year transportation financially feasible plan alternatives.~~

~~m) 25-year transportation financially feasible plan alternatives.~~ ~~[~~*[Moved to Policy T-6.2]*

A Transportation Concurrency Exception Area (TCEA) is an urban area delineated by a local government where infill and redevelopment are encouraged, and where exceptions to the transportation concurrency requirement are made, providing that alternative modes of transportation, land use mixes, urban design, connectivity, and funding are addressed. The City of Naples does not currently have a TCEA; however, if the City decides to designate a TCEA, a Comprehensive Plan amendment shall be required. The data and analysis to support the TCEA will be provided in conjunction with such a Plan amendment. *[Moved from TE Policy 1-13]*

Policy T-2.3 Traffic Impact Analyses

~~Participate in applicable Corridor Management Studies in coordination with the Collier County Planning Department.~~ *[Moved to Policy T-6.3]* Require transportation and traffic impact analysis for all commercial and residential development proposals ~~over one (1) acre~~ per thresholds established in the Code of Ordinances. Clarify? *[Moved from TE Policy 5-5]*

Policy T-2.4 Traffic Circulation

~~Continue to coordinate the site planning process for large developments with the Collier Metropolitan Planning Organization staff through the exchange of information and analysis. This will ensure coordination between the City and County as well as the MPO, and tie traffic circulation to future growth. These informal meetings may also address level of service monitoring, data analysis and strategies for roadway improvement.~~ ***[Moved to Policy T-6.4]***

Consider traffic circulation needs in the context of traffic management, review all site plans for development and redevelopment proposals for required minimum street and/or alley right-of-way dedications and for circulation-related improvements in order to ensure compliance with established City policy, criteria, and standards. ***[Moved from TE Policy 5-6]***

~~**Policy 2.5**~~

~~Evaluate program goals including Complete Streets and multimodal options to reduce peak hour travel demand and reduce the number of vehicle miles traveled per capita while increasing the quality of life. Complete Streets as defined by City Council Resolution #15-13719 means roadways planned, designed, and constructed to provide access to all users in a manner that promotes safe, efficient movement of people and goods, whether by car, truck, transit, assistive device, foot, or bicycle.~~ ***[Moved to Policy T-3.3 and Action T-3.3.1]***

~~**Policy 2.6**~~

~~Continue to monitor the effectiveness of the established truck routes throughout the City.~~ ***[Moved to Policy T-5.7]***

~~**Policy 2.7**~~

~~All activities and uses on the "Airport Commercial" designated property as delineated on the Future Land Use Map shall be consistent with the Airport Utilization Plan periodically updated and adopted by the City Council.~~ ***[Moved to Policy T-11.4]***

Objective T-3 Complete Streets and Roadscapes





Improve the condition, safety, and appearance of the City's streets, alleys, public parking areas and related traffic control signs, and street furniture, as identified in the Capital Improvement Program. Consistent with Complete Streets principles, the City shall enhance transportation corridors to safely accommodate all users, incorporating shade trees and other landscape elements, where practicable, to enhance the urban tree canopy, provide shade, improve corridor aesthetics, and mitigate heat impacts. The City will reduce sign pollution by limiting roadway signage only to that required by law or necessary for public safety and protect existing and future rights-of-way including public easements, from encroachment.

Policy T-3.1 Landscaping Program

Continue the roadway median landscaping program and ongoing ~~street tree planting~~ Naples Tree Fill-In program on all of the City's major streets with ~~plantings that are drought-resistant, indigenous, require minimal maintenance~~ "Florida Friendly" plant species whenever feasible, to

support diverse, non-invasive vegetation, ~~and are~~ consistent with the City's Street Tree Planting policies and in alignment with the latest approved Naples Green Print. The program will be based on recommendations of a professional landscape architect and minimizes adverse impacts to public and private utilities.

Policy T-3.2 Sidewalks Included with Street Projects

Where ~~possible~~ feasible, incorporate costs of sidewalks into major street renovation and repairs consistent with the sidewalk master plan. What is considered a major street renovation?

Policy T-3.3 Complete Streets

~~Continue to develop bike paths, greenways and pedestrian pathways that promote connectivity within and out of the City of Naples.~~ ***[Moved to Policy T-7.6]*** ~~Evaluate program goals including Complete Streets and multimodal options to~~ Establish a safe, connected and context-sensitive transportation network that prioritizes Complete Streets design to reduce peak hour travel demand and ~~reduce~~ the number of vehicle miles traveled per capita while increasing the quality of life. ~~Complete Streets as defined by City Council Resolution #15-13719 means roadways planned, designed, and constructed to provide access to all users in a manner that promotes safe, efficient movement of people and goods, whether by car, truck, transit, assistive device, foot, or bicycle~~. ***[Moved from TE Policy 2-5]***

> **Action T-3.3.1** Evaluate transportation program goals including Complete Streets and multimodal options. ~~to~~ Complete Streets as defined by ~~City Council Resolution #15-13719~~ the Florida Department of Transportation means context-sensitive transportation system design that considers local land development patterns and built form and that serves the needs of transportation system ~~roadways planned, designed, and constructed to provide access to all~~ users of all ages and abilities, including but not limited to: cyclists, motorists, transit riders, freight handlers, and pedestrians. ***[Moved from TE Policy 2-5]***

Policy T-3.4 Developer Requirements for Landscaping

Require new development and redevelopment to make required street and parking area ~~related beautification~~ improvements according to the landscape provisions in the Code of Ordinances and, where possible, negotiate landscaping maintenance agreements prior to the installation of highway plantings. New development and redevelopment will be required to plant right-of-way trees in accordance with the existing tree pattern for that neighborhood, or as approved by the ~~Community Services~~Planning Director and the landscape architect of record. Any right-of-way trees to be removed due to driveways and accesses will be relocated, at the cost to the developer, to a site designated by the City.

> ~~**Policy 3.5**~~ **Action T-3.4.1** Maintain landscaping installation and maintenance guidelines in the Code of Ordinances for roads and roadways that will enhance the attractiveness of the City.

~~Policy 3.6~~ **Action T-3.4.2** Continue to install water and electric casings for landscaping purposes when new roads are constructed, or when present roads are upgraded or repaired.

Policy T-3.5 Driveway Access Points

Minimize crash conflict points and impervious area created by paved surfaces that negatively impact water quality and are inconsistent with the City's Stormwater Master Plan, Pedestrian and Bicycle Master Plan and Complete Streets initiatives.

Action T-3.5.1 Within the City's public rights-of-way, explore the feasibility of limiting the number of and separation distance between driveway access points from streets to private properties in such a way as to minimize crash conflict points and impervious area.





Objective T-4 Level of Service (LOS)

Maintain adopted level of service standards for the roadway network to ensure safe, efficient, and reliable movement of people and goods throughout the City. ~~Annually review and update the City's Emergency Operations Plan in cooperation with the Collier County Emergency Management Department relative to evacuation routes and traffic control techniques to maintain or reduce hurricane evacuation times.~~ ***[Moved to Objective T-10]*** (See also Policy CCI-2.1 – Roadway Facilities in the Concurrency and Capital Improvements Element.)

Policy T-4.1 Maintain Level of Service

~~Maintain a coordinated Emergency Operations Plan with Collier County and other surrounding Collier County and municipal governments.~~ ***[Moved to Policy T-10.1 and Action T-10.1.1]*** ~~Maintain Level of Service (LOS) C peak hour volume for all roadways based on the 100th hourly volumes design, except for Fifth Avenue South between U.S. 41 and Gulf Shore Boulevard, which has been defined as a "constrained facility." For County maintained roads (Goodlette-Frank Road and Golden Gate Parkway)within the City limits, the City shall adopt Level of Service E. For State roads within City limits, (U.S. 41 [S.R. 45 & S.R. 90]), the City shall adopt LOS E.~~ The Transportation Level of Service standards are provided in the Concurrency and Capital Improvements Element and may be reviewed and updated periodically to ensure consistency with the Collier County Long Range Transportation Plan, Naples Pedestrian and Bicycle Master Plan, and specific corridor planning studies and master plans.

Action T-4.1.1 On a periodic basis, update the Capacity Management System (CMS) Report to include existing and anticipated capacities, levels of service, and other relevant metrics, and publish it for public review and use.

Policy T-4.2 Operational Improvements

~~As part of the Stormwater 10-year Improvement Plan, the Engineering Division has identified flood prone roadways and potential solutions for better drainage in these areas. Identified solutions will be included in Capital Improvement budgets over the next five (5) to ten (10) years~~ ***[Moved to Policy T-10.2]*** Operational improvements will be considered in lieu of roadway widening for future City roadway deficiencies. For roadway segments under State or County jurisdiction, the City shall coordinate with the respective agencies regarding projects to improve levels of service.

Policy T-4.3 Traffic Flow Optimization

~~Continue to work closely with the Florida Department of Transportation and the Collier County Department of Transportation in an effort to eliminate the various problems associated with State and County routes in and around the City~~. ***[Moved to Policy T-10.3]*** Enhance traffic flow on roadways by applying intelligent transportation systems and coordinating traffic signals or roundabouts to efficiently move multimodal and emergency response uses of the transportation system. ***[Moved from TE Policy 1-4]***

Objective T-5 Road Network and Connectivity





~~Quarterly monitor and review development and peak hour/peak season traffic counts in order to provide safe, efficient and convenient travel facilities circulation including pedestrian, cyclists, and the handicapped as well as motorized transportation systems.~~ ***[Moved to Policy T-5.6***] ~~Based on the special traffic studies, strive~~ Maintain and enhance the integrity of existing roadways while striving to develop a more efficient transportation network that encourages the diversion of traffic from local streets to collector~~s~~ and arterial roads~~s~~. Recommended physical improvements ~~which~~ will be coordinated with the Five-Year Capital Improvements Program. ***[Moved from TE Policy 2-1]***

Policy T-5.1 Monitoring Traffic Volumes and Accidents

~~Monitor traffic volumes and accidents to assess potential traffic problems and provide resources to make improvements~~ ***[Moved to Action T-5.1.1]*** To identify new trends and address changing traffic conditions, the City will analyze available traffic data to diagnose and address critical traffic issues.

> **Action T-5.1.1** Annually m~~M~~onitor traffic volumes and accidents to assess traffic problems and provide resources to make improvements. ***[Moved from TE Policy 5-1]***

Policy T-5.2 Review and Update Roadway Design Standards

~~Review and update as necessary the City's roadway design standards and propose specific revisions for City Council adoption when necessary~~ ***[Moved to Action T-5.2.1]*** To leverage best

practices for roadway design and to address roadway challenges experienced in Naples, the City will regularly update its Roadway Design Standards.

> **Action T-5.2.1** Annually ~~R~~review and update as necessary the City's roadway design standards and propose specific revisions for City Council adoption~~when necessary~~. ***[Moved from TE Policy 5-2]***

Policy T-5.3 Evaluate and Implement Traffic Calming Alternatives

~~Maintain a priority listing,~~ Work with the community to evaluate and implement traffic calming alternatives where they may be needed based on traffic volumes, collision history, and other factors. ~~to determine those street sections within the City where traffic has to be managed in conjunction with traffic calming.~~

Policy T-5.4 Protect Goodlette-Frank Road Facility Function

With the cooperation of Collier County's Department of Transportation, limit direct access onto Goodlette-Frank Road from abutting properties by requiring properties fronting other roadways to use those for access where it is a safe alternative to access on Goodlette-Frank Road. This will protect the arterial function of this important north/south transportation facility.

Policy T-5.5 Appropriation of Funding

~~Require transportation and traffic impact analysis for all commercial and residential development proposals over one (1) acre.~~ ***[Moved to Policy T-2.3]*** Transportation improvements will be considered and incorporated as part of the regular update to the City's Five-Year Capital Improvement Program.

> **Action T-5.5.1** Annually consider the appropriation of funds within the ~~five~~Five-Year Capital Improvement Program budget to address traffic calming and Complete Streets projects as recommended by staff and approved by the City Council. In addition, explore alternative sources of financing to overcome potential shortfalls in transportation funding**.** ***[Moved from TE Policy 1-9]***

Policy T-5.6 Peak-Hour and Peak-Season Traffic Counts

~~Consider traffic circulation needs in the context of traffic management, review all site plans for development and redevelopment proposals for required minimum street and/or alley right-of-way dedications and for circulation-related improvements in order to ensure compliance with established City policy, criteria, and standards.~~ ***[Moved to Policy T-2.4]*** ~~Quarterly monitor and review~~Collect and monitor ~~development and peak hour/peak~~ peak-hour and peak -season traffic counts in order to provide safe, efficient and convenient ~~travel facilities~~ circulation ~~including~~ for pedestrians, cyclists, ~~and the handicapped as well as~~ individuals with accessibility needs, and motorized transportation ~~systems~~ users. Keep Monthly or quarterly. ***[Moved from TE Objective 5]***

Policy T-5.7 Truck Routes

~~If a mass transit system is approved that contains routes within the City, the Code of Ordinances will be amended to require sites along approved mass transit routes to be evaluated for modifications to the parking areas to accommodate facilities related to multimodal transportation systems.~~ ***[Moved to Policy T-8.4]*** Continue to monitor the effectiveness of the established truck routes throughout the City and amend routes as needed. **[Moved from TE Policy 2-6]**

Objective T-6 Intergovernmental Coordination Strategies

Assure intergovernmental consistency by an annual review of plans and programs with Collier County, the Collier Metropolitan Planning Organization, and the Florida Department of Transportation's Five-Year Transportation Plan.(See also Objective IC-1 in the Intergovernmental Coordination Element.)

Policy T-6.1 Coordination with Collier County

~~Maintain the~~Strengthen intergovernmental coordination ~~development review process~~ with Collier County ~~during the development review process~~ to ensure the ~~City's~~ City has the opportunity to review and comment ~~uponvarious Collier County development proposals that could potentially have a significant~~ on proposed projects that the City determines may significantly impact ~~upon~~ the City.

Policy T-6.2 Inter-Agency Planning Coordination

Participate in the development and review, particularly with the development of elements outlined below, of all long-range plans of the Florida Department of Transportation and the Collier Metropolitan Planning Organization (MPO); and incorporate all recommendations which are consistent with the City's plans. Work with the FDOT and MPO to resolve any recommendations which are inconsistent with City plans. Program elements for close review and coordination include, but not limited to, the following as applicable to the City of Naples:

a. Transportation Model updates and validation.
b. Zonal data used in the revision and/or modification of traffic analysis zones.
c. Multi-Modal Transportation systems. ~~See Map Series in Support Document.~~
d. Transit Service systems.
e. Technological Transportation systems.
f. Emergency response systems.
g. Congestion management systems.
h. ~~10-year~~ Collier MPO Transit Plan.
i. Average Annual Daily Traffic (AADT) Volumes and Levels of Service Conclusions.
j. 10-year transportation model needs assessments and needs improvements.
k. 25-year transportation model needs assessments and needs improvements.
l. 10-year transportation financially feasible plan alternatives.

m. 25-year transportation financially feasible plan alternatives. ***[Moved from TE Policy 2-2]***

Policy T-6.3 Corridor Management Studies

Participate in applicable Corridor Management Studies in coordination with the Collier County ~~Planning~~ Growth Management Department. (See also Policy IC-1.6 in the Intergovernmental Coordination Element.) ***[Moved from TE Policy 2-3]***

Policy T-6.4 Site Planning Process Coordination

Continue to coordinate the site planning process for large developments with the Collier Metropolitan Planning Organization (MPO) staff through the exchange of information and analysis. This will ensure coordination between the City and County as well as the MPO, and tie traffic circulation to future growth. These informal meetings may also address level of service monitoring, data analysis and strategies for roadway improvement. ***[Moved from TE Policy 2-4]***



Objective T-7 Pedestrian and Bicyclist Connectivity and Safety

Enhance the safety, connectivity and mobility of existing and future pedestrian and bicycle pathways.

Policy T-7.1 Implement Sidewalk Master Plan

Strategically implement segments of the Pedestrian and Bicycle Master Plan on an annual basis as part of the City's Five-Year Capital Improvements Program consistent with the Sidewalk Master Plan in order to maximize available resources.

Policy T-7.2 Bicycle Licensing and Education

Continue the Police ~~and Emergency Services~~ Department's bicycle licensing and education program in addition to other safety programs and events for children and adults to promote bicycle safety.

Policy T-7.3 Development Review

Pedestrian and bicycle needs will be reviewed in conjunction with projects that require a Site Plan application.

Policy T-7.4 Prioritize School Access

Give priority to those portions of the overall sidewalk/bike path providing access to and from school areas.

Policy T-7.5 Americans with Disabilities Act (ADA)

~~Ensure~~ Maintain compliance with the Americans with Disabilities Act (ADA) ~~compliance~~ when ~~modifying~~ improving existing pathways and installing new ~~pathways~~ ones.

Policy T-7.6 Greenways, Bicycle and Pedestrian Route Connectivity

Continue to develop bike ~~paths~~ routes, greenways and pedestrian pathways or routes that promote connectivity within and out of the City of Naples. ***[Moved from TE Policy 3-3]***

Objective T-8 Public Transit



Continue to coordinate with the MPO to evaluate the potential for the development of an efficient multimodal transportation system and mechanisms to reduce the reliance on private motor vehicles.

Policy T-8.1 Data and Analysis for Development of Public Transportation System

Provide support data and analysis to the MPO as necessary to assist in the development of a public transportation system.

Policy T-8.2 Alternative Modes of Transportation

Assist the MPO in programs that promote alternative modes of transportation and encourage reducing the use of private automobiles and vehicle trips.

Policy T-8.3 Public Transit Concurrency Exemption

~~Coordinate any future public transportation system development with the airport operations.~~ ***[Moved to Policy T-11.2]*** Public transit facilities are exempt from concurrency management requirements found in the Comprehensive Plan. Public transit facilities are defined in Section 163.3180~~(4)(b)~~(5)(h)1.b., F.S. ***[Moved from TE Policy 1-14]***

Policy T-8.4 Accommodation of Transit Facilities

If a mass transit system is approved that contains routes within the City, the Code of Ordinances will be amended to require sites along approved mass transit routes to be evaluated for modifications to the parking areas to accommodate facilities related to multimodal transportation systems, while protecting residential neighborhoods. ***[Moved from TE Policy 5-7]***

Objective T-9 Energy Efficiency & Resiliency





Promote ~~Establish~~ a transportation mobility program that supports the development of resilient, environmentally sustainable multimodal infrastructure and helps to ~~to identify and implement strategies to~~ reduce ~~greenhouse gas emissions~~ air pollution and heat island effect~~. The areas for potential reduction in greenhouse gas emissions will be~~ focused on programs, policies and code adoptions that have a net impact of reduced travel delays, reduced vehicular trips, reduced vehicle trip length and measures to improve the efficiency of travel. (See also Policy FLU-1.11 in the Future Land Use Element.)

Policy T-9.1 Maintain Existing Street Grid System

Maintain the existing street grid system so as to continue to disburse travel trips, utilize alternative routes, maintain and/or ~~decrease the time of travel and to reduce the carbon 'footprint'~~ improve the quality of air associated with ~~of~~ transportation impacts within the City.

Policy T-9.2 Land-Use Zoning

Promote mixed land-use zoning that reduces trip lengths, number of trips and/or time of travel.

> **Action T-9.2.1** Examine the feasibility of offering regulatory incentives for developments that include charging stations for energy efficient vehicles.

Policy T-9.3 Pedestrian and Bicycle Master Plan

Promote intermodal facilities to provide both travel options and more efficient travel. Support implementation of t~~T~~he goals of the City's Pedestrian and Bicycle Master Plan ~~include~~ including reducing vehicular trips by providing a system of interconnected sidewalks and bike lanes to encourage alternate forms of transportation that result in a reduced carbon 'footprint~~.~~'.

> ~~**Policy 9.4**~~ **Action T-9.3.1** Promote public use of intermodal facilities through the use of public meetings, use of the City's website and direct support of service providers.

> ~~**Policy 9.7**~~ **Action T-9.3.2** Establish 10-year goals for sidewalk improvements and bicycle facility improvements, consistent with the ~~goals of Item #3 above~~ recommendations in the Naples Pedestrian and Bicycle Master Plan.

> **Action T-9.3.3** Implement the recommendations of the City's Pedestrian and Bicycle Master Plan.

Policy T-9.~~5~~4 Inter-City Transit Connectivity, Routes, Access and Frequency

Continue to support, participate in, and investigate improved inter-City transit connectivity, routes, access and frequency through representation on the Collier Metropolitan Planning Organization (MPO), MPO Technical Advisory Committee (TAC), MPO Citizens Advisory Committee (CAC), MPO Congestion Management Committee (CMC), and MPO Bicycle/Pedestrian Advisory Committee (BPAC).

Policy T-9.~~6~~5 Improve Intra-City and Transit Loops

Continue to investigate improving intra-City and transit loops with low capacity, energy efficient vehicles to provide circulation without increasing vehicular movements in congested areas.

Policy T-9.~~8~~6 Walkable Community Initiatives

Support walkable community initiatives with the goal of encouraging short trips via intermodal facilities rather than short vehicular trips.

Policy T-9.~~9~~7 Congestion Management Initiatives

Support congestion management initiatives, particularly as they relate to movement of vehicles on 'mainline' facilities with reduced travel delays.

Policy T-9.~~10~~8 Supporting ITS Technologies

Support intelligent transportation systems to include new systems and operation of systems so as to reduce travel delays and increase the capacity and efficiency of existing transportation systems.

Policy T-9.~~11~~9 Signal Timing on Arterial Routes

Establish a long-term goal of signal coordination with the City's arterial routes operating in a 'traffic responsive' manner which will reduce travel delays, increase capacity and reduce time of travel.

Policy T-9.~~12~~10 Implement Speed Controls

~~Implement speed controls to 'pace' traffic on signalized corridors and in so doing reduce travel delays.~~ ***[Moved to Action T-9.10.1]*** The City will leverage signalization controls to reduce traffic congestion and travel delays.

> **Action T-9.10.1** Implement speed controls to 'pace' traffic on signalized corridors~~and in so doing reduce travel delays~~. ***[Moved from TE Policy 9-12]***

Policy T-9.~~13~~ 11 Street Tree Program

Maintain a street tree program for traffic calming and reduced ~~greenhouse gases~~air pollution.

Policy T-9.12 Micromobility Devices

City regulations for micromobility devices will be prepared and updated as needed.

> **Action T-9.12.1** The City will update the Code of Ordinances to incorporate regulation of micromobility devices in accordance with County, state, and local public safety agency regulations.



Objective T-10 Evacuation Routes

Annually review and update the City's Emergency Operations Plan in cooperation with the Collier County Emergency Management Department relative to evacuation routes and traffic control techniques to maintain or reduce hurricane evacuation times. ***[Moved from TE Objective 4]*** (See also Policy IC-4.7 in the Intergovernmental Coordination Element).

Policy T-10.1 Comprehensive Emergency Management Plan

Maintain a coordinated Comprehensive Emergency ~~Operations~~ Management Plan (CEMP) with Collier County and other surrounding ~~Collier County and~~ municipal governments. ***[Moved from TE Policy 4-1]***

> **Action T-10.1.1** ~~Maintain a coordinated Emergency Plan~~Work with Collier County and other surrounding municipalities ~~governments~~ to regularly update the Comprehensive Emergency Management Plan. ***[Moved from TE Policy 4-1]***

Policy T-410.2 Flood Prone Roadways and Solutions for Better Drainage

As part of the ~~Stormwater~~ 10- year ~~Improvement~~ Stormwater Master Plan, the Engineering Division has identified flood prone roadways and potential solutions for better drainage in these areas~~. Identified s~~ Solutions to be implemented will be included in the Capital Improvement ~~budgets~~ Program ~~over the next five (5) to ten (10) years~~. ***[Moved from TE Policy 4-2]***

Policy T-410.3 Intergovernmental Coordination for Evacuation Routes

Continue to work closely with the Florida Department of Transportation and the Collier County Department of Transportation in an effort to eliminate the various problems associated with State and County evacuation routes in and around the City. ***[Moved from TE Policy 4-3]***

> **Action 10.3.1** Improve public awareness of evacuation zones, shelter locations, and evacuation routes.

Objective T-11 Aviation

THIS SHOULD BE REVISITED FOLLOWING SETTLEMENT WITH NAA



Ensure coordinated planning with the Naples Airport Authority to support the local economy while promoting land use compatibility surrounding the airport. (See also Intergovernmental Coordination Element Objective IC-1 and Future Land Use Element Objective FLU-7.)

Policy T-11.1 Adopted Naples Airport Master Plan and Airport Layout Plan (ALP)

Support implementation of the adopted Naples Airport Master Plan and Airport Layout Plan (ALP).

Policy T-11.2 Coordinate Public Transportation and Airport Operations

Coordinate any future public transportation system development with the airport operations. ***[Moved from TE Policy 8-3]***

Policy T-11.3 Coordinate Land Use Decisions

Coordinate with FAA, FDOT, and Collier MPO on land use decisions affecting airport access.

Policy T-11.4 Airport Commercial Designated Property

~~All~~ Ensure activities and uses on the "Airport Commercial" designated property as delineated on the Future Land Use Map ~~shall be~~ are consistent with the Airport Utilization Plan (AUP), periodically updated and adopted by the City Council. ***[Moved from TE Policy 2-7]***

Policy T-11.5 Airport Noise Contour Map

Include the most recently adopted airport noise contour map on the adopted Future Land Use Map.

Policy T-11.6 Airport Planning and Development Review Criteria

The City will coordinate with the Naples Municipal Airport Authority on preparing code of ordinance amendments regarding airport planning and development review criteria.

Policy T-11.7 Residential Sound Insulation Program

Support the Naples Airport Authority's creation of a Residential Sound Insulation Program that would convert all eligible noncompatible multi-family residential units within the Future Conditions (2026) DNL 60 and higher noise contours to compatible uses.

Policy T-11.8 Determining Location of Noise Operations Management Systems (NOMs)

The City will provide input to the Naples Municipal Airport Authority as they determine the locations of noise monitors as part of a noise operations management system (NOMS) for the measurement and collection of noise data.

Policy T-11.9 Noise Mapping and Compatibility Standards

The City will work with Naples Municipal Airport Authority to establish an approach to noise mapping and compatibility standards that recognizes fluctuations in aircraft activity and peak noise exposure periods rather than calculating noise based on an average annual day.

9

PARKS, RECREATION AND OPEN SPACE ELEMENT



In this Section:

Introduction

Goal, Objectives, Policies, and Actions

~~Park Land Inventory~~

~~Recreation Facilities~~

INTRODUCTION

The Parks and Recreation Element establishes the framework for the planning, preservation, and expansion of parks, open spaces, recreational facilities, and waterfront access opportunities within the community. As a coastal community, access to Naples' natural resources, waterways, and shoreline environments is a defining component of the community's identity and quality of life. This Element guides the development of a balanced system of parks and recreational facilities that serve residents and visitors while protecting sensitive coastal and natural resources.

Consistent with the requirements of Florida Statutes Chapter 163 Part II (Community Planning Act), this Element evaluates existing recreational assets, identifies future needs based on population growth and tourism activity, and establishes level-of-service standards to ensure that adequate recreational facilities are provided over the 20-year planning horizon. The Element also supports coordination with regional, state, and federal agencies responsible for managing public lands, waterways, and coastal ecosystems.

Integration with other Elements of the Comprehensive Plan—including Future Land Use, Conservation and Coastal Management, Transportation, and Concurrency and Capital Improvements—ensures that parks and recreational facilities are located strategically, accessible to residents and visitors, and supportive of long-term community resilience.

Through implementation of the goals, objectives, policies, and actions established in this element, the community seeks to maintain a diverse, accessible, and environmentally-responsible system of parks and recreation facilities and open space that celebrates its coastal character, protects natural resources, and enhances the health and improves the quality of life for current and future generations.

The Naples Parks, Recreation and Open Space Element supports the goals, objectives, ~~and~~ policies, and actions contained in several of the other comprehensive plan elements including the five (5) Vision Initiatives and Priorities ~~Goals:~~

1. ~~Preserve the Town's distinctive character and culture~~ Our Place – Preserve Small Town Character and Culture
2. ~~Make Naples the Green Jewel of Southwest Florida~~ Our Nature -Environmental Sensitivity
3. ~~Maintain an extraordinary quality of life for residents~~ Our Experience – Extraordinary Quality of Life for Residents
4. ~~Strengthen the economic health and vitality of the City~~ Our Economy – Economic Health and Vitality
5. ~~Maintain and enhance governance capacity for public service and leadership~~ Our Governance – High Performing Government

The intent of this ~~section~~ Element is to ~~establish goals and objectives~~ outline strategies and initiatives to ~~ensure~~ guide the development and management of parks, recreation and open space lands and facilities ~~are developed and managed~~ to meet the needs of the entire Naples ~~residents~~ community, while prioritizing residents. ~~Existing~~ As of March 2026, the current public recreation facilities include the following:

COMMUNITY PARKS	CONSERVATION AREAS	NEIGHBORHOOD PARKS
• Baker Park • Cambier Park • Fleischmann Park • Naples Landing~~s~~ Park & Boat Launch • Lowdermilk Park • Naples Dog Park	• ~~Baker Park (Future)~~ • Gordon River Greenway • ~~Riverside Circle Parcel~~ Naples Preserve and Hedges Family Eco-Center	• Charlie C. Anthony Park • River Park Aquatic Center • River Park Community Center • Seag~~-G~~ate Park

MINI-PARKS	LINEAR PARKS
• 8th Avenue South • Alligator Lake East Park • Alligator Lake West Park • Betsy Jones Park • Bowl~~-L~~ine Park • Cambridge Perry Park • Coconut Point Mini Park • Lois Selfon Park • Lord Horatio Nelson Mini Park • Menefee Mini Park • Merrihue Mini Park • Naples City Dock • Naples Pier • Putter Point Mini Park • Rodgers Mini Park • Sandpiper Park	• Broad Avenue South Linear Park • Goodlette-Frank Linear Park • Orchid Banyon Linear Park • Riley Park (Gordon Drive Linear) • Sea~~-G~~gate-Crayton Road Linear Park

PUBLIC BEACH ACCESS POINTS

- Horizon Way
- Vedado Way
- Via Miramar
- Admiralty Point
- 1977 Gulf Shore Blvd North
- Lowdermilk Park (7)
- 8th Avenue North
- 7th Avenue North
- North Lake Drive
- 6th Avenue North
- 4th Avenue North
- 3rd Avenue North
- 2nd Avenue North
- 1st Avenue North
- Central Avenue
- 1st Avenue South
- 2nd Avenue South
- 3rd Avenue South
- 4th Avenue South
- 5th Avenue South
- 6th Avenue South
- 7th Avenue South
- 8th Avenue South
- 9th Avenue South
- 10th Avenue South
- 11th Avenue South
- Broad Avenue South
- Naples Pier
- 12th Avenue South
- 13th Avenue South
- 14th Avenue South
- 15th Avenue South
- 16th Avenue South
- 17th Avenue South
- 18th Avenue South
- 1900 Gulf Shore Blvd South
- 21st Avenue South
- 32nd Avenue South
- 33rd Avenue South
- 3590 Gordon Drive

Public access to the waterfront is a key priority of this Element. Strategies encourage the protection and maintenance of public shoreline access points, blueways and greenways, and connections between parks, neighborhoods, and waterways. ~~The City also provides~~ Facilities include the Naples Pier, which is a popular landmark on the Gulf ~~of Mexico~~, boat docking facilities, and access to the Gordon River at the Naples City Dock. The City also ~~and~~ maintains approximately 9.1 miles of Gulf Coast beaches~~.~~, which includes forty beach access points located along the shoreline within the City limits.

Although the Florida Statutes do not require local governments to establish level-of-service (LOS) standards for parks and recreation facilities, the City of Naples has chosen to include LOS standards in its Comprehensive Plan as part of its concurrency management system. Future park land and facilities will be provided based upon the ~~established~~ level of service standards ~~in this element~~ established in the Concurrency and Capital Improvements Element.

The City is currently in the process of updating its Parks and Recreation Master Plan. The recommendations in the plan will be based upon existing site inventories and analysis, community needs survey, and public engagement. The plan will guide City investment in park and recreation facilities through the Capital Improvements Plan based upon the priorities established by City Council.

GOAL, OBJECTIVES, ~~AND~~ POLICIES, AND ACTIONS

The following goal, objectives, ~~and~~ policies, and actions outline the short- and long-term strategies for providing quality parks and recreation facilities and the preservation of publicly owned open space in the City of Naples.

The goal, objectives, ~~and~~ policies, and actions contained in this element supplement the Vision ~~2007 Work Plan~~ Element and Parks and Recreation Master Plan and will be coordinated with those efforts.

GOAL

To plan and develop park, recreation and open space facilities (facilities) and right-of-way landscape treatments (landscaping) that serve to preserve ~~the~~ Naples' distinctive character and enhance residents' quality of life. The objectives and policies contained in this element serve to support the Vision ~~2007 work plan~~ Element and Parks and Recreation Master Plan.



Objective PROS-1 ~~Planning:~~ Maintain and Enhance Parks, Recreation, and Open Space

Maintain Naples as the "Green Jewel" of Southwest Florida and provide~~s~~ an extraordinary quality of life for residents through well planned, resilient and connected parks, recreation facilities, open spaces, beach and waterfront access points, paths and trails, and right-of-way landscaping.

Policy PROS-1.1 Parks and Recreation Master Plan Implementation and Updates

~~Adopt a comprehensive Parks and Recreation Master Plan in 2017 and update the plan every 5-years~~. ***[Moved to Action PROS 1.1.1 and 1.1.3]*** ~~Review annually for Capital Improvement Plan (CIP) and Operating Budget recommendations and to accommodate community growth and/or changing demographics.~~ ***[Moved to Action PROS 1.1.2]*** Ensure that Naples has a well-balanced park system and consider the ongoing cost of maintenance for specific park or recreation facilities during the planning process~~. Overseen~~ as overseen by the Community Services Department. The Community Services Advisory Board (CSAB) serves the Community Services Department in an advisory capacity and provides recommendations to City Council on items presented to the CSAB by the Department.

> **Action PROS-1.1.1** Implement the recommendations within the adopted Parks and Recreation Master Plan. ***[Moved from PROSE Policy 1-1]***

> **Action PROS-1.1.2** Annually ~~R~~review ~~annually for~~the Capital Improvement Plan (CIP) and Operating Budget recommendations to address ~~and to accommodate~~ changing parks and recreation needs due to population and demographic changes~~community growth and/or changing demographics~~. ***[Moved from PROSE Policy 1-1]***

> **Action PROS-1.1.3** Conduct an update to the Parks and Recreation Master Plan on an ongoing five-year schedule. ~~the plan every 5 years~~ ***[Moved from PROSE Policy 1-1]***

Policy PROS-1.2 Parks and Recreation Needs Assessment

Engage residents ~~through a formal needs survey~~ to assess the condition of facilities and landscaping; evaluate residents' opinions to determine how effectively parks and recreation services create positive, welcoming, and enjoyable experiences; and to inform planning initiatives about emerging recreational trends and changing needs~~. Complete a statistically valid needs survey with residents every 5 years. The needs survey shall be conducted in advance of~~ ***[Moved to Action PROS-1.2.1]*** as part of updates to the Parks and Recreation Master Plan.

> **Action PROS-1.2.1** Complete a statistically valid needs survey with residents every 5 years as part of the Parks and Recreation Master Plan update process to identify changing conditions and needs. ***[Moved from PROSE Policy 1-2]***

Policy PROS-1.3 Beach Access and Beach Park Improvements

Plan for improvements to beach access areas and beach parks to meet the needs of residents including, ADA accessibility, parking facilities, ~~and~~ shower facilities, and other recommendations of the Parks and Recreation Master Plan.

Policy PROS-1.4 Walking and Bicycling Connectivity Improvements

Plan for improvements that enhance the walking and biking experience in the City and promote these as alternatives to automobile use in the City consistent with recommendations that promote connectivity and safety in facility design and planning provided in the Naples Pedestrian and Bicycle Master Plan Update.

Policy PROS-1.5 Gordon River Greenway Connectivity

Connect to the Gordon River Greenway through neighborhood bike and pedestrian improvement projects and through park facilities where feasible.

Policy PROS-1.6 Neighborhood Park Improvements

Plan improvements at neighborhood parks toward the needs of the specific neighborhoods they are intended to serve in collaboration with residents.

Policy PROS-1.7 Shared Use of School Facilities

~~Seek opportunities with the Collier County School Board for use of school facilities to meet the park and recreation needs of both the students and the residents near such facilities~~ Maintain an interlocal agreement with CCPS for Seagate Park and work with CCPS to facilitate use of public school property by residents. (See also Policy IC-5.7 in the Intergovernmental Coordination Element.)

Policy PROS-1.8 Open Space Requirements in Private Development

~~Through the development review process,~~ Update the Code of Ordinances to require developers of multi-family, mixed use, and commercial projects ~~office complexes and commercial centers~~ to include more functional and accessible open spaces, in the form of plaza areas, mini-parks, or other landscaped open space areas, within their developments. (See also Action FLU-4.1.2 in the Future Land Use Element.)

~~Policy 1.9 Complete plans for Baker Park and develop the park as funding is available.~~ [1]

[1] Deleted obsolete language.



Objective PROS-2 ~~Environmental:~~ Promote Environmental Resiliency, Responsibility, and Sustainability

Protect beaches, wildlife, and key water bodies. Promote community resiliency, sustainability and environmental conservation through maintenance and adaptation of parks, recreation facilities, open space areas and right-of-way landscaping. New facilities shall be planned incorporating data from the 2023 City of Naples Critical Assets and Facilities Vulnerability Assessment to assure flood risk is analyzed in design. (See also Objective R-2 and related policies and actions in the Resiliency Element.)

Policy PROS-2.1 Beach Maintenance and Renourishment Coordination

Seek opportunities to improve resident experiences at City beach areas by collaborating with Collier County on beach renourishment projects, improving beach parking areas, planting and restoration of dunes, and mitigating man -made contributions to red tide algal blooms.

Policy PROS-2.2 Sustainable Materials and Energy Efficient Equipment

Evaluate options to use materials and energy- efficient equipment that are cost effective, environmentally friendly, and sustainable including consideration of products and equipment manufactured from recycled goods and materials, when planning facility improvements.

Policy PROS-2.3 Public Health Focused Park and Open Space Design

Include evaluation of the following public health components in park facilities and open space design to reduce potential impacts: surface contents, coatings and materials of playground or exercise equipment, landscape treatments, cooling, shade and hydration elements and other health-related factors that can enhance safety for the community's use.

Policy PROS-2.~~3~~4 Renewable Energy Integration

To reduce operational costs of facilities, e~~E~~valuate options for renewable and sustainable energy sources, ~~including~~ such as solar power options, including encouraging floating solar facilities as defined in Section 163.32051, F.S, when planning facility improvements.

Policy PROS-2.~~4~~5 Stormwater and Resource Conservation in Open Space Planning

Integrate ~~drainage, aquifer recharge~~ quality stormwater management, and natural resource conservation as part of open space planning.

Policy PROS-2.~~5~~6 Water Resource Protection and Recreational Value

Protect the recreational value of the City's water resources and participate in programs to improve water quality.

Policy PROS-2.~~6~~7 Trash and Recycling Management Policies

Evaluate options for trash and recycling carry-in/carry-out policies to minimize trash collection and maintenance expenses within parks and recreational facilities.

Policy PROS-2.~~7~~8 Mitigate or Adapt Parks to Flood Risk

~~Plan to m~~Mitigate ~~impacts of climate change at~~ or adapt park and open space facilities to flood risks throughout the City, particularly in coastal and beach areas, to the ~~best~~ extent ~~possible~~practicable.

Policy PROS-2.9 Tree and Palm Planting Program

Support the replacement of lost trees and palms primarily along neighborhood streets through implementation of the Naples Tree Fill-In Program. Plant species that increase canopy coverage as well as provide environmental benefits, such as shade trees along walkways and bike paths.

Policy PROS-2.10 Florida-Friendly Landscaping Practices

Utilize ~~native~~ "Florida Friendly" plant species ~~where and~~ whenever ~~feasible~~practicable, to support diverse, non-invasive vegetation in alignment with the latest approved Urban Forestry Green Print for the City ~~2024~~. (See also Policy FLU-4.1 in the Future Land Use Element.) ***[Moved from PROSE Policy 5-8]***

Policy PROS-2.11 Climate-Resilient and Environmentally Sustainable Vegetation

Promote the installation of climate-resilient and environmentally sustainable vegetation, such as salt-tolerant plants, mangroves, and green infrastructure, while discouraging the use of high-maintenance shrubs and trees.

Policy 2.12 Promote Enjoyment and Protection of Wildlife

The City shall enact and implement policies for its parks, Naples City Dock, Naples City Pier, beaches, and other public waterfront areas that support and are consistent with the State of Florida's laws, rules, and regulations for the protection of wildlife. Such policies should promote responsible public use while enhancing the experience of nature to represent the commitment of Naples to environmental stewardship. The City should coordinate with relevant state and federal agencies and update its practices as wildlife-protection requirements and best management practices evolve.



Objective PROS-3 ~~Funding:~~ Establish a Fiscally Sound Funding Strategy for Parks and Open Space

Strengthen the economic health and vitality of the City by establishing a fiscally sound plan for parks, recreation facilities, and open space.

Policy PROS-3.1 Cost Recovery Policies

Establish cost recovery policies for parks, recreation facilities, and programs. ~~in 2018 and update policies every 5 years or, as necessary~~. ***[Moved to Action PROS-3.1.1]***

> **Action PROS-3.1.1** Evaluate cost recovery policies for parks, recreation facilities, and programs on a five year cycle or as need is determined through the annual review of parks and recreational facility budgeting. ***[Moved from PROSE Policy 3-1]***

Policy PROS-3.2 Grant and Alternative Funding Sources

Actively pursue available grants, private donations, and alternative funding sources to supplement programs and facility expenses.

Policy PROS-3.3 Fair-Share Funding Coordination with Collier County

Prepare data on parks, recreational facilities, and open space use patterns for fair-share funding discussions with Collier County. (See also Action IC-1.1.3 in the Intergovernmental Coordination Element.)

Policy PROS-3.4 Public and Private Partnerships

Foster working relationships with other government, non-profit, and private entities to pursue initiatives and partnerships that are mutually beneficial and include cost-sharing opportunities.

Policy PROS-3.5 Funding Strategies

Develop ~~long-term and~~ short- and long-term funding strategies to fund necessary improvements to parks, recreational facilities, open spaces and right-of-way landscaping projects to ensure City facilities do not deteriorate or fall into a state of disrepair.



Objective PROS-4 ~~Programming:~~ Develop and Maintain Recreational Programming

Develop and maintain recreational programming for residents of all ages that serve to promote community health, educational enrichment, and to improve the quality of life.

Policy PROS-4.1 Active Lifestyle Programming

Investigate and promote recreational programs that encourage and promote active lifestyles and healthy practices.

Policy PROS-4.2 Recreational and Cultural Program Variety

Ensure a variety of recreational and cultural programming consistent with demand, needs and aspirations of residents and visitors.

Policy PROS-4.3 Year-Round Program Opportunities

Increase year-round recreational program opportunities for adults, ~~and~~ youth, and seniors ~~as represented in the 2015 Needs Assessment~~, including at-risk youth, and special needs residents as identified in the Parks and Recreation Master Plan.

Policy PROS-4.4 Arts, Music, and Special Event Programming

Provide opportunities for outdoor music and special events, and visual and performing arts, that enrich the lives of residents and are site appropriate and well balanced with competing community needs and interests of adjoining residential neighborhoods.

Policy PROS-4.5 River Park Aquatics Center Programming

Maximize programming at the River Park Aquatics Center to ensure community use is well balanced among lap swimmers, learn to swim programs, free swim opportunities and competitive swimming.

Policy PROS-4.6 Collier County Recreational Program Coordination

Encourage Collier County to expand its recreational programs, including special needs programming, to ease the burden placed on City facilities by Collier County residents.

Policy PROS-4.7 Resident Priority in City Programs

Give City residents priority in City-sponsored recreational programs, when feasible.



Objective PROS-5 ~~Implementation:~~ Maintain Extraordinary Quality of Life

Maintain an extraordinary quality of life for ~~residents~~ the community, while prioritizing residents, through well-~~-~~maintained and sustainable, resilient parks, recreation facilities, and open space.

Policy PROS-5.1 Park and Program Quality Maintenance

Maintain the quality of the parks and recreational programs.

Policy PROS-5.2 Capital Improvements and Concurrency Coordination

Designate in the Concurrency and Capital Improvements Element the facilities required to meet future demands per level of service standards including consideration of current and future flood risk. (See also Objective CCI-6 in the Concurrency and Capital Improvements Element.)

~~**Policy 5.3** Explore feasibility of adopting a Unit or Access Level of Service standard to best serve the parks, recreational and open space needs of residents by 2020.~~[2]

Policy PROS-5.43 Level of Service Deficiency Corrections

Based on established levels of service for recreation, as set forth in ~~the chart below~~ the Concurrency and Capital Improvements Element, and upon annual level of service reports, the City shall correct or improve any deficiencies in parks, recreation facilities or open space and consider the need for adaptation and mitigation improvements as feasible. (See also Objective CCI-1 Capital Improvements Program and Objective CCI-2 Levels of Service (LOS) and related policies and actions in the Concurrency and Capital Improvements Element.)

> ~~Policy 5.5~~ **Action PROS-5.3.1** Review park and recreation level of service standards on an annual basis to maintain adequate facilities as based upon community needs.
> ***[Moved from PROSE Policy 5-5]***

[2] Consistent with CCIE Policy 2-4

> **Action PROS-5.3.2** Within one year of completion of the 2026 Parks and Recreation Master Plan, the City shall review and update the LOS standards, as needed.

Policy PROS-5.~~6~~4 Functional and Accessible Open Space

Ensure that land used as part of the open space inventory shall be functional and accessible to the general public.

Policy PROS-5.~~7~~5 Urban Forest Green Print Implementation

~~Maintain an annual~~ Implement the Naples Urban Forest ~~Plan as required by the Code of Ordinance~~ Green Print, and update as needed, to ensure the City's lush public landscaping is well maintained and ~~managed~~ represents Naples commitment to environmental stewardship, best practices, and public safety. (See also Policy FLU-4.3 in the Future Land Use Element.)

Policy PROS-5.~~8~~6 Public Engagement and Program Promotion

~~Utilize native plant species where and when feasible~~ ***[Moved to Policy PROS-2.10]*** Promote parks, recreation programs, facility improvement projects, public engagement, etc. through social media platforms, online maps, and educational/activity brochures. ***[Moved from PROSE Policy 5-10]***

Policy PROS-5.~~9~~7 Park Land Level of Service Standards

The level of service standards for park lands and recreation facilities is ~~in accordance with the park land inventory, as listed in the following chart~~ provided in the Concurrency and Capital Improvements Element and may be reviewed and updated periodically to ensure consistency with the Naples Parks and Recreation Master Plan, Naples Pedestrian and Bicycle Master Plan, and specific parks planning studies and master plans. (See also Objective CCI-2 in the Concurrency and Capital Improvements Element.)

Policy PROS-5.~~10~~8 Expanding Green Space

~~Promote parks, recreation programs, facility improvement projects, public engagement, etc. through social media platforms, online maps and educational/activity brochures.~~ ***[Moved to Policy PROS-5.6]*** Identify opportunities to increase green space through the acquisition of land for linear or pocket parks, or the establishment of conservation easements.

~~**PARK LAND**~~[3]

~~Type~~	~~Provided~~	~~Service Level~~	~~Needed~~
~~Community Parks and Conservation Areas*~~	~~106 acres~~	~~2 acres/ 1,000 population~~	~~0 acres~~
~~Neighborhood, Linear and Mini Parks**~~	~~32 acres~~	~~1 acre/ 1,000 population~~	~~0 acres~~

[3] Deleted. LOS standards are now in CCIE and evaluation of LOS is conducted annually in the LOS Report.

~~Total 138 acres - -~~

~~*Cambier, Fleischmann, Lowdermilk, and Landing Parks, Riverside Circle, Gordon River, Naples Preserve, Riverside Circle east of the Community Services office~~

~~**Anthony Park, River Park, Seagate School Park~~

~~NOTE: Mini-parks and linear parks, including Rodgers, Merrihue, Menefee, Bow Line, Sea Gate Linear Park, Orchid Linear Park, Betsy Jones Park, Coconut Point Park, and Goodlette Linear Park, are not assigned a level of service but may be considered as open space.~~

~~RECREATION FACILITIES~~ *[Moved to CCI]*

~~Facility~~	~~Provided~~	~~Service Level~~	~~Needed~~
~~Basketball Courts~~	~~8~~	~~1/5,000 population~~	~~0~~
~~Baseball Fields~~	~~5~~	~~1/5,000 population~~	~~0~~
~~Beach Access Points~~	~~40~~	~~1/1,000 population~~	~~0~~
~~Boat Ramps/Docks~~	~~3~~	~~1/9,000 population~~	~~0~~
~~Bike Lanes and Routes~~	~~26 miles~~	~~1/1,500 population~~	~~0~~
~~Community Centers~~	~~3~~	~~1/9,000 population~~	~~0~~
~~Football Fields~~	~~1~~	~~1/20,000 population~~	~~0~~
~~Handball/Racquetball Courts~~	~~5~~	~~1/20,000 population~~	~~0~~
~~Picnic Areas~~	~~22~~	~~1/5,000 population~~	~~0~~
~~Play Areas~~	~~7~~	~~1/6,000 population~~	~~0~~
~~Soccer Fields~~	~~2~~	~~1/10,000 population~~	~~0~~
~~Softball Fields~~	~~3~~	~~1/5,000 population~~	~~0~~
~~Swimming Pools~~	~~1~~	~~1/20,000 population~~	~~0~~
~~Tennis Courts~~	~~15~~	~~1/2,000 population~~	~~0~~
~~Trails~~	~~5~~	~~1/region~~	~~0~~
~~Volleyball Courts~~	~~5~~	~~1/5,000 population~~	~~0~~

~~NOTE: Service Level Standards developed by the National Recreation and Park Association~~

10

INTERGOVERNMENTAL COORDINATION ELEMENT



In this Section:

Introduction

Goal, Objectives, Policies, and Actions

INTRODUCTION

Required per Florida Statutes Section 163.3177, t~~T~~he Intergovernmental Coordination Element has three (3) primary functions: (1) to ensure plan consistency with State, Regional, and County Plans; (2) to identify issues that require cooperation of various jurisdictional entities such as units of local government, regional planning commissions, state agencies, and water management districts; and (3) to establish policies and procedures to implement inter-governmental coordination efforts to address the identified issues.

GOAL, OBJECTIVES, ~~AND~~ POLICIES, AND ACTIONS

The following goal, objectives, ~~and~~ policies, and actions address the short- and long-term issues concerning development, adoption, and implementation of the City's Comprehensive Plan. When applicable, these ~~objectives and policies~~ are consistent with goals proposed or adopted by Collier County, the Southwest Florida Regional Planning Council, the District School Board of Collier County, and the State of Florida. This will ensure that the City's planning efforts will be consistent with and will further the goals and objectives of local, regional, and state plans.

GOAL

Coordinate the development, adoption, and implementation of the City's Comprehensive Plan with the plans of other governmental entities ~~in order~~ to provide a consistent, economical and effective comprehensive planning effort.

Objective IC-1 Intergovernmental Coordination on Land Use Planning, Public Services, and Infrastructure



The City will continue to develop mechanisms to improve intergovernmental coordination over documented levels. Coordination shall include addressing the impacts of development on adjacent jurisdictional areas as related to the implementation of the City's Comprehensive Plan. It also includes monitoring and coordination with other jurisdictions on their land use and public infrastructure decisions that impact land located and public services provided within Naples. The plan should be consistent with the plans of Collier County, the District School Board of Collier County, and other units of government with~~out~~ regulatory authority over land use. (See also Objective T-6 in the Transportation Element.)

Such coordination should include opportunities for meaningful input from established neighborhood associations and community organizations, particularly when intergovernmental planning decisions may affect neighborhood character, public infrastructure, transportation, stormwater management, or the delivery of essential services.

Policy IC-1.1 Intergovernmental Coordination in Comprehensive Planning

The City of Naples shall conduct efforts to support interjurisdictional coordination and intergovernmental collaboration as it pertains to comprehensive planning efforts.

> ~~Policy 1.1~~ **Action IC-1.1.1** The Comprehensive Plan and all significant amendments thereto shall be forwarded to adjacent governmental entities and other appropriate agencies for their review and comment before adoption by the City Council.

> ~~Policy 1.2~~ **Action IC-1.1.2** The City of Naples Planning Department shall monitor Collier County's comprehensive planning efforts to ensure coordination and reduce conflicts between Collier County's Comprehensive Plan and the City's Comprehensive Plan. Alignment of comprehensive planning efforts presents an opportunity to reduce impacts on public services and facilities and mitigate community character incompatibilities in common areas of interest.

> ~~Policy 1.3~~ **Action IC-1.1.3** The City of Naples will provide specific technical information upon request to other governmental entities on matters relating to conditions within the City of Naples. (See also Policy PROS-3.3 in the Parks, Recreation, and Open Space Element.)

> ~~Policy 1.4~~ **Action IC-1.1.4** The City of Naples Planning Department shall monitor the plans of the Southwest Florida Regional Planning Council and the South Florida Water Management District to eliminate conflicts between plans, to assure consistency, and to further the objectives of these plans.

~~Policy 1.5~~ Action IC-1.1.5 The City shall keep the District School Board of Collier County informed of all education-related activities undertaken by the City of Naples.

Policy IC-1.2 Joint Land Use Planning Agreements and Studies

The City will evaluate the process for entering into a Joint Planning Agreement with Collier County pursuant to section 163.3171, F.S. to pursue a coordinated approach to address topics such as drainage, protection of water basins, land use planning, and growth management for an area or areas where the City abuts unincorporated Collier County.

Joint planning efforts should also consider interconnected stormwater and drainage systems, transportation networks, coastal resiliency, emergency evacuation routes, and other critical infrastructure where decisions in one jurisdiction may materially affect neighboring communities.

> ~~Policy 1-6~~ **Action IC-1.2.1** ~~Develop~~ Explore opportunities to develop joint planning agreements and land use studies between Collier County and the City of Naples to increase the consistency of land use within two (2) miles of the City/County line.

> **Action IC-1.2.2** Evaluate if joint planning agreements and land use studies between Collier County and the City of Naples are warranted beyond two (2) miles of the City/County line to ensure the City has the opportunity to participate in land planning activities for areas where the City determines that development projects may significantly impact the City.

Policy IC-1.3 Interlocal Service Boundary Agreements

To plan for current and future public service impacts with cross-jurisdictional implications, the City will consider establishing a new Interlocal Service Boundary Agreement with Collier County.

> **Action IC-1.3.1** The City will evaluate the process for entering into an Interlocal Service Boundary Agreement with Collier County as outlined in section 171.203, F.S. to address service delivery, service area boundaries, fiscal responsibilities, joint use of facilities, colocation of services, and/or to establish a process for land use decisions consistent with part II of Chapter 163, F.S., for an area or areas where the City abuts unincorporated Collier County.

Policy IC-1.~~7~~4 Coordinate Bay Restoration Efforts

~~Develop a Naples Bay Watershed Basin Management Committee consisting of representatives from the City of Naples,~~ Continue to coordinate efforts with Collier County and the Big Cypress Basin Board to provide support for bay restoration efforts addressed in the Conservation and Coastal Management Element~~s~~ objectives and policies of the Comprehensive Plan~~s~~.

Policy IC-1.~~8~~5 Citywide Communications

Improve public information and participation programs by all City departments for the citizens of the metropolitan area.

The City shall promote transparent, timely, and meaningful public communication and participation in intergovernmental planning initiatives. Such efforts should include proactive engagement with established neighborhood associations, community organizations, and

affected residents, particularly when proposed policies, infrastructure improvements, or development decisions may have significant neighborhood or communitywide impacts.

~~**Policy 1.9** Insure public school facility compliance with all applicable codes and land use restrictions and confirm the adequate provision of services to proposed improvements to~~

~~School District properties through a site plan review process consistent with the adopted interlocal agreement and State Statutes.~~ ***[Moved to Policy IC-3.1]***

Policy IC-1.~~10~~6 Corridor Management Planning

Develop metropolitan corridor management plans for remaining corridors not completed. The plans shall strive to improve the consistency of land use and development regulations and carry out urban design policies along those corridors. (See also Policy T-6.3 in the Transportation Element.)

Policy IC-1.7 Extra-jurisdictional Review

The City shall continue to coordinate with Collier County to review developments within the County's jurisdiction that may have impacts on Naples.

> ~~**Policy 1.11**~~ **Action IC-1.7.1** Maintain the joint intergovernmental planning agreement between the City of Naples and Collier County planning staffs to review development proposals outside of the respective jurisdictions and to comment on such development ~~in order~~ to evaluate the impacts of development as related to adjacent governments' Comprehensive Plans.

> **Action IC-1.7.2** Participate in joint City/Collier County informal planning staff meetings, Regional Planning Council Technical Advisory Committee meetings, Metropolitan Planning Organization Technical Advisory Committee meetings, the Joint Affordable Housing Commission, ~~Staff Working Group meetings on school concurrency~~ the Collier County School District,[1] and other intergovernmental organizations as appropriate in order to share pertinent information and coordinate planning functions. ***[Moved from ICE Objective 2]***

~~**Policy 1.12** Coordinate with the District School Board of Collier County on the regulatory review of residential development for school location planning.~~ ***[Moved to Policy IC-5.5]***

Policy IC-1.8 Septic to Sewer Conversion Projects

Continue interlocal agreements between the City and Collier County to participate in joint septic to sewer projects that eliminate septic tanks.[2]

Policy IC-~~2.1~~1.9 Conflict Resolution through SWFRPC

~~Utilize the Southwest Florida Regional Planning Council to resolve land use or annexation disputes.~~ ***[Moved from ICE Policy 2.1]*** If reconciliation of differences is needed for planning and growth management issues between local governments, regional agencies, and private interests, the City will participate in the dispute resolution process established by the Regional

[1] Revisions based on 2018-2021 PAB Recommendations.

[2] New policy added based on 2018-2021 PAB Recommendations.

Planning Council pursuant to section 186.509, F.S. or the Florida Governmental Conflict Resolution Act in Chapter 164, F.S.

Policy IC-~~2.2~~1.10 MPO Technical Advisory Committee

The City will work with the MPO Technical Advisory Committee to implement the transportation policies within the City. ***[Moved from ICE Policy 2-2]***

Policy IC-1.11 Coordinate Airport Zoning Regulations

Pursuant to Chapter 333, F.S. the City will continue to ensure that airport zoning regulations associated with Naples Municipal Airport are adopted within the City's Code of Ordinances, and the City will continue to coordinate with Collier County to ensure the regulations are also adopted in the Collier County Land Development Code. (See also Future Land Use Element Objective FLU-7 and Transportation Element Objective T.11.)

> **Action IC-1.11.1** The Naples Airport Authority and City Council will meet annually ~~quarterly~~ for review and comment on proposed airport budget and development. ***[Moved from Future Land Use Policy 7-1.2]*** City Council and the Naples Airport Authority Executive Director or Designee will meet quarterly to discuss aviation, noise, and development concerns.[3]

~~Objective 2: Participate in joint City/Collier County informal planning staff meetings, Regional Planning Council Technical Advisory Committee meetings, Metropolitan Planning Organization Technical Advisory Committee meetings, the Joint Affordable Housing Commission, Staff Working Group meetings on school concurrency and other intergovernmental organizations as appropriate in order to share pertinent information and coordinate planning functions.~~ ***[Moved to Action IC-1.7.2]***

~~Policy 2-1: Utilize the Southwest Florida Regional Planning Council to resolve land use or annexation disputes.~~ ***[Replaced with Policy IC-1.9]***

~~Policy 2-2: The City will work with the MPO Technical Advisory Committee to implement the transportation policies within the City.~~ ***[Moved to Policy IC-1.10]***

[3] 2018-2021 PAB Recommendations.

Objective IC-~~3~~2 Coordinate Level of Service Standards



~~On an annual basis, t~~The City's Planning Department will review level of service standards established by Collier County, the Southwest Florida Regional Planning Council, the District School Board of Collier County and relevant state agencies. ***[Moved from ICE Objective 3]***

Policy IC-~~3~~2.1 Align Level of Service Standards

To ~~as~~ensure level of service consistency, establish the same level of service standards as designated by Collier County for Collier County services provided in the City. The City will also encourage Collier County to establish the same level of service standards for City services provided in Collier County. ***[Moved from ICE Policy 3-1 and renumbered]*** The City will establish level of service standards for public facilities consistent with the adopted standards of the state, regional, or local entity having operational and maintenance responsibility for such facilities. (See Objective CCI-8 and related policies in Concurrency and Capital Improvements Element.)

> ~~**Policy 3.2**~~ **Action IC-2.1.1** Maintain and carry out interlocal agreements relative to sewer and water services between the City and Collier County. ***[Moved from ICE Policy 3-2 and renumbered]***

> ~~**Policy 3.3**~~ **Action IC-2.1.2** Monitor Collier County's level of service standards for solid waste services which the County provides to the City and maintain the same standards. ***[Moved from ICE Policy 3-3 and renumbered]***

> ~~**Policy 3.4**~~ **Action IC-2.1.3** Provide the District School Board of Collier County with the annual updates on population projections and the construction of residential units within the City. ***[Moved from ICE Policy 3-4 and renumbered]***

> ~~**Policy 3.5**~~ **Action IC-2.1.4** Coordinate with the District School Board of Collier County to amend the Concurrency and Capital Improvements Element to reflect modifications of concurrency service area boundaries, changes in level of service standards, and school facility improvements. ***[Moved from ICE Policy 3-5 and renumbered]***

Objective IC-3 Evaluate School Concurrency for Applicable Development



The City, in cooperation with the School District and Collier County , shall ensure a school concurrency evaluation is performed on all non-exempt residential development to verify that new students can be accommodated within the adopted level of service standard established for each school type as measured within a CSA. (See Objective CCI-8 and related policies in Concurrency and Capital Improvements Element.). ***[Moved from the Public School Facilities Element, Objective 1-2 (Residential Development Review)]***

Policy IC-~~1.9~~3.1 Interjurisdictional Coordination for School Planning

~~Insure~~ Ensure public school facility compliance with all applicable codes and land use restrictions and confirm the adequate provision of services to proposed improvements to School District properties through a site plan review process consistent with the adopted interlocal agreement and State Statutes. ***[Moved from ICE Policy 1-9]***

Policy IC-3.2 Exempt Residential Uses

The City shall consider the following residential uses exempt from the requirements of school concurrency: ***[Moved from the Public School Facilities Element, Objective 1-2.2 (Residential Development Review)]***

- Single family and mobile home lots of record, existing as of the effective date of school concurrency.
- Any new residential development that has a final plat or site plan approval or the functional equivalent of a site- ~~-~~specific development order as of the effective date of school concurrency.
- Any amendment to any previously approved residential development order that does not increase the number of dwelling units or change the dwelling unit type (e.g., single-family to multi-family).
- Age-restricted communities with no permanent residents under the age of 18. Exemption of an age- ~~-~~restricted community will be subject to a restrictive covenant limiting the age of permanent residents to 18 years and older.
- All new residential plats and site plans (or functional equivalent), or amendments to previously approved residential development orders, which are calculated to generate less than one student. Such development shall be subject to payment of school impact fees.
- Development that has been authorized as a Development of Regional Impact pursuant to Chapter 380, F.S., as of July 1, 2005.

Policy IC-3.3 School Concurrency Review Process for Residential Development

The City, through its land development regulations, and in conjunction with the School District, ~~shall establish~~will continue to conduct a school concurrency review process for all residential development projects that are not exempt under ~~Policy 3.2 of~~ this Element. ***[Moved from the Public School Facilities Element, Objective 1-2.3 (Residential Development Review) with***

modifications to acknowledge the School Concurrency process adopted in 2010 per Ordinance # 10-12649]

- The City shall not approve any non-exempt residential development application for a new residential preliminary plat, site plan or functional equivalent until the School District has issued a School Capacity Availability Determination Letter (SCADL) verifying available capacity to serve the development. ***[Moved from the Public School Facilities Element, Objective 1-2.1 (Residential Development Review)]*** The minimum process requirements are as follows: ***[Moved from the Public School Facilities Element, Objective 1-2.3 (Residential Development Review)]*** A residential development application including a School Impact Analysis (SIA) is submitted to the City for review.
- The City determines if the application is complete for processing and transmits the complete SIA to the School District for review.
- The School District reviews the application for available capacity and issues a School Capacity Availability Determination Letter (SCADL) to the City stating:
    - If capacity is available within the affected CSA, the School District shall issue a SCADL verifying available capacity.
    - If capacity is not available within the affected CSA, adjacent CSAs are reviewed for available capacity. If the affected CSA does not contain a particular school type (elementary, middle, high), the adjacent CSA's shall be evaluated for available capacity.
    - If capacity is available in the adjacent CSAs, the School District shall issue a SCADL verifying available capacity in the adjacent CSAs.
    - If capacity is not available in the adjacent CSAs, the School District shall issue a SCADL indicating the development is not in compliance with the adopted LOS~~S~~ and offer the applicant the opportunity to negotiate a mitigation plan within a 90-day period.

The Interlocal Agreement for Public School Facility Planning and School Concurrency and this ~~Public School Facilities Element~~ Concurrency and Capital Improvement Element shall provide the process necessary to determine available school capacity for all residential projects that are not exempt under ~~Policy 3.2 of~~ this Element. ***[Moved from the Public School Facilities Element, Objective 1-2.3 (Residential Development Review)]***

Policy IC-3.4 Residential Development Impacts on School Capacity

The City, in conjunction with the School District, shall review an applicant's residential development proposal for proportionate share mitigation projects to add the school capacity necessary to satisfy the impacts of the proposed residential development. ***[Moved from the Public School Facilities Element, Objective 1-2.4 (Residential Development Review)]***

- Mitigation options may include, but are not limited to:
    - Contribution of land or payment for land acquisition in conjunction with the provision of additional school capacity; or

- Mitigation banking based on the construction of a public school facility in exchange for the right to sell capacity credits; or
- Donation of buildings for use as a primary or alternative learning facility; or
- Renovation of existing buildings for use as learning facilities; or
- Construction or expansion of permanent student stations or core capacity; or
- Construction of a public school facility in advance of the time set forth in the School District Five- Year Capital Facilities Plan.

- If mitigation is approved, the City and the School District shall enter into an enforceable binding agreement with the applicant. The improvement(s) must be directed by the School District toward a school capacity improvement(s) identified in the School District's Five Year Capital Plan, and the improvement(s) must be reflected in the next update to the County's Capital Improvements Element. Following execution of the Agreement, the School District shall issue a SCADL verifying available capacity to support the development.

[Moved from the Public School Facilities Element, Objective 1-2.4 (Residential Development Review)]

- If mitigation is denied, the City must deny the application based upon a lack of available school capacity. ***[Moved from the Public School Facilities Element, Objective 1-2.4 (Residential Development Review)]***

- Within one (1) year from the effective date of the School Concurrency Growth Management Plan amendments, the City shall adopt school concurrency provisions into its Land Development Regulations (LDR) to implement school concurrency. ***[Moved from the Public School Facilities Element, Objective 1-2.5 (Residential Development Review)]***

Objective IC-4 Interjurisdictional Coordination on Resiliency

The City shall coordinate with regional partners to share the outcomes of its vulnerability and resiliency planning efforts, including data collection, asset prioritization, adaptation strategies, funding opportunities, and policy responses. (See also Objective R-1 and related policies and action in the Resiliency Element).

Interjurisdictional coordination should prioritize the identification and implementation of critical infrastructure improvements, particularly where interconnected stormwater systems, coastal flooding, transportation corridors, and utility networks require collaborative planning, funding, and implementation across jurisdictional boundaries.

~~The City will consider proposed annexations in accordance with the policies established in the Future Land Use Element~~. ***[Moved to Objective IC-6]***

~~**Policy 4.1** Confer with all affected jurisdictions to ensure an equitable and smooth transition from Collier County to City jurisdiction.~~ ***[Moved to Policy IC-6.1]***

~~**Policy 4.2** Develop a planning agreement, if appropriate, with the County to provide for City planning of proposed annexation areas~~ ***[Moved to Policy IC-6.2]***

~~**Policy 4.3** Provide the same high level of service to residents and property owners in areas~~

~~that are annexed that is provided to the current citizens of the City.~~ ***[Moved to Policy IC-6.3]***

~~**Policy 4.4** Incorporate newly annexed areas into the neighborhood planning process in order to identify and address specific areas of public concern within newly annexed neighborhoods .~~ ***[Moved to Policy IC-6.4]***

~~**Policy 4.5** Maintain the zoning conversion chart as shown in the Future Land Use Element.~~
[Moved to Policy IC-6.5]

Policy IC-4.1 Data Development

For future modeling and analysis, the City shall coordinate with state and federal partners, such as the South Florida Water Management District (SFWMD) and United States Geological Survey (USGS), to analyze rainfall curves, storm impacts, and integrated water resource information to provide more comprehensive data about the relationships between various types of flood risk that currently pose and will pose risk in the future to public infrastructure and assets.

Policy IC-4.2 Data Coordination

The City shall continue to coordinate with agencies, municipalities, and other public and private entities to share the best available data and develop approaches to flood resilience that enhance the quality of life and ensure the safety of residents and visitors.

Policy IC-4.3 Interagency and Service Provider Coordination

The City shall collaborate with service providers, Collier County, the Florida Department of Transportation, Florida Department of Health, School District, privately-owned medical facilities, Florida Power & Light, People's Gas and other energy providers, the South Florida Water Management District and other regional partners to exchange data, plans, and solutions to address flood risks. The City shall also share vulnerability data across internal departments and other critical care providers.

Policy IC-4.4 Disaster and Emergency Management

The City shall coordinate the development of resilience and adaptation projects with its pre-disaster mitigation plans, the Local Mitigation Strategy and other emergency management and disaster recovery strategies and planning efforts. Develop, continue, and enhance collaborative efforts with regional partners to develop other useful data sources for emergency management and resiliency planning. This includes real time flood monitoring and early warning detection systems, drought warning, debris management, recovery and response, pre-storm preparedness, shelter readiness and capacity, evacuation planning, recovery resource staging, and other strategic local mitigation planning initiatives.

Policy IC-4.5 Regional Collaboration

The City shall collaborate with other governmental partners to provide residents, businesses, and community organizations with information on current and projected resilience challenges, such as flooding, sea-level rise, and infrastructure adaptation–and gather stakeholder input to inform municipal policy updates.

The City shall collaborate with other governmental partners to provide residents, businesses, established neighborhood associations, and community organizations with information on current and projected resilience challenges, including flooding, sea-level rise, and infrastructure adaptation. The City shall actively solicit stakeholder input early in the planning process and consider such input when establishing priorities, evaluating adaptation alternatives, and developing municipal policy updates.

Policy IC-4.6 Stormwater Infrastructure Improvement Coordination

The City of Naples Utilities Department will work routinely with Collier County Growth

Management to provide updated utility improvement coordination on stormwater improvement projects within the City's Utility Service area to reduce conflicts with City owned infrastructure.[4] (See also Policy PFWR-3.1 in the Public Facilities and Water Resources Element.)

Coordination should also include identifying shared drainage challenges, evaluating downstream and upstream impacts, prioritizing critical infrastructure improvements, and exploring opportunities for coordinated project implementation and funding.

Policy IC-4.7 Emergency Preparedness

The City, the County, other municipalities within the County, and the School District shall coordinate on emergency preparedness issues. ***[Moved from the Public School Facilities Element, Objective 1-3.5 (School Location and Infrastructure)]*** Coordinate with the Department of Emergency Management and the Florida Department of Law Enforcement to leverage all available resources. (See also Objective T-10 and related policies and actions in the Transportation Element.)

[4] New policy added based on 2018-2021 PAB Recommendations.

Objective IC-5 Coordination on School Facilities and Locations



The City and the School District will~~:~~ coordinate the location of public schools with the Future Land Use Map and map series to ensure that existing and proposed school facilities are located consistent with existing and proposed residential areas they serve and are proximate to appropriate existing and future land uses, and serve as community focal points. ***[Moved from the Public School Facilities Element, Objective 1-3 (School Location and Infrastructure)]*** (See also Public and Semi-Public General Land Use description in the Future Land Use Element.)

Policy IC-5.1 Schools and Public Facilities

The City will work with the School District to coordinate the location of public school facilities relative to the location of other public facilities such as parks, libraries and community centers to the extent possible. ***[Moved from the Public School Facilities Element, Objective 1-3 (School Location and Infrastructure)]***

Policy IC-5.2 Schools and Infrastructure

The City will work with the School District to coordinate existing and planned public school facilities with the plans for supporting infrastructure. ***[Moved from the Public School Facilities Element, Objective 1-3 (School Location and Infrastructure)]***

Policy IC-5.3 Schools and Emergency Preparedness

The City will work with the School District to establish a monitoring group; and address coordination on emergency preparedness issues. ***[Moved from the Public School Facilities Element, Objective 1-3 (School Location and Infrastructure)]***

Policy IC-5.4 School Improvements

The City, in conjunction with the School District, shall jointly determine the need for, and timing of, on-site and off-site improvements necessary to support new schools, proposed expansions, construction that changes the primary use of a facility, stadium construction, or construction that results in a greater than five percent increase in student capacity, on a case by case basis, at the time of site planning. ***[Moved from the Public School Facilities Element, Objective 1-3.1 (School Location and Infrastructure)]***

> **Action IC-5.4.1** Prior to commencement of construction of a new school, the City shall enter into an agreement with the School Board identifying the timing, location, and the party or parties responsible for the planning, constructing, operating, and maintaining infrastructure improvements necessary to support a new school or school improvement, and ensure that the necessary infrastructure is in place prior to or concurrent with school construction. ***[Moved from the Public School Facilities Element, Objective 1-3.2 (School Location and Infrastructure)]***
>
> **Action IC-5.4.2** The City, the County and other municipalities within the County, in conjunction with the School District, shall establish a Citizen Advisory Group (CAG) to monitor planning and school concurrency in Collier County. ***[Moved from the Public***

> ***School Facilities Element, Objective 1-3.6 (School Location and Infrastructure) and Intergovernmental Coordination Policy 1.12]***

Policy IC-5.5 School Location Planning

Coordinate with the District School Board of Collier County on the regulatory review of residential development for school location planning. ***[Moved from ICE Policy 1-12]***

> **Action IC-5.5.1 School Sites and Land Use Compatibility** The City shall review all proposals for new public schools, school expansions, or the redevelopment of existing schools to determine compatibility of school sites and surrounding land uses. City staff shall consider standards such as, but not limited to, building setbacks, buffering, traffic calming, and noise and glare attenuation. City staff shall provide comments to the School District for incorporation into the site plan. ***[Moved from the Public School Facilities Element, Objective 1-3.3 (School Location and Infrastructure)]***

Policy IC-5.6 School Site Co-Location with Public Facilities

The City, in conjunction with the School District, shall seek opportunities to co-locate schools with public facilities, such as parks, libraries, and community centers, as the need for these facilities is identified. A separate agreement between the District and the City or other appropriate entity, will be developed for each instance of co-location and shared use which addresses legal liability, operating and maintenance costs, scheduling of use, and facility supervision. ***[Moved from the Public School Facilities Element, Objective 1-3.4 (School Location and Infrastructure)]*** (See also Policy PROS-1.7 in the Parks, Recreation, and Open Space Element.)

Objective IC-6 Annexations

The City will consider proposed annexations in accordance with the policies established in the Future Land Use Element. ***[Moved from ICE Objective 4]*** (See also the Generalized Future Land Use-Annexation subsection of the Future Land Use Element.)

The City shall provide meaningful opportunities for residents, property owners, and established neighborhood organizations in proposed annexation areas and adjacent City neighborhoods to participate in the planning process, including consideration of infrastructure capacity, service delivery, neighborhood compatibility, and potential fiscal impacts.

Policy IC-46.1 Annexation Coordination

Confer with all affected jurisdictions to ensure an equitable and smooth transition from Collier County to City jurisdiction. ***[Moved from ICE Policy 4-1]***

Policy IC-46.2 Planning Agreements for Proposed Annexation Areas

Develop a planning agreement, if appropriate, with the County to provide for City planning of proposed annexation areas. ***[Moved from ICE Policy 4-2]***

Policy IC-46.3 Annexation Areas Levels of Service

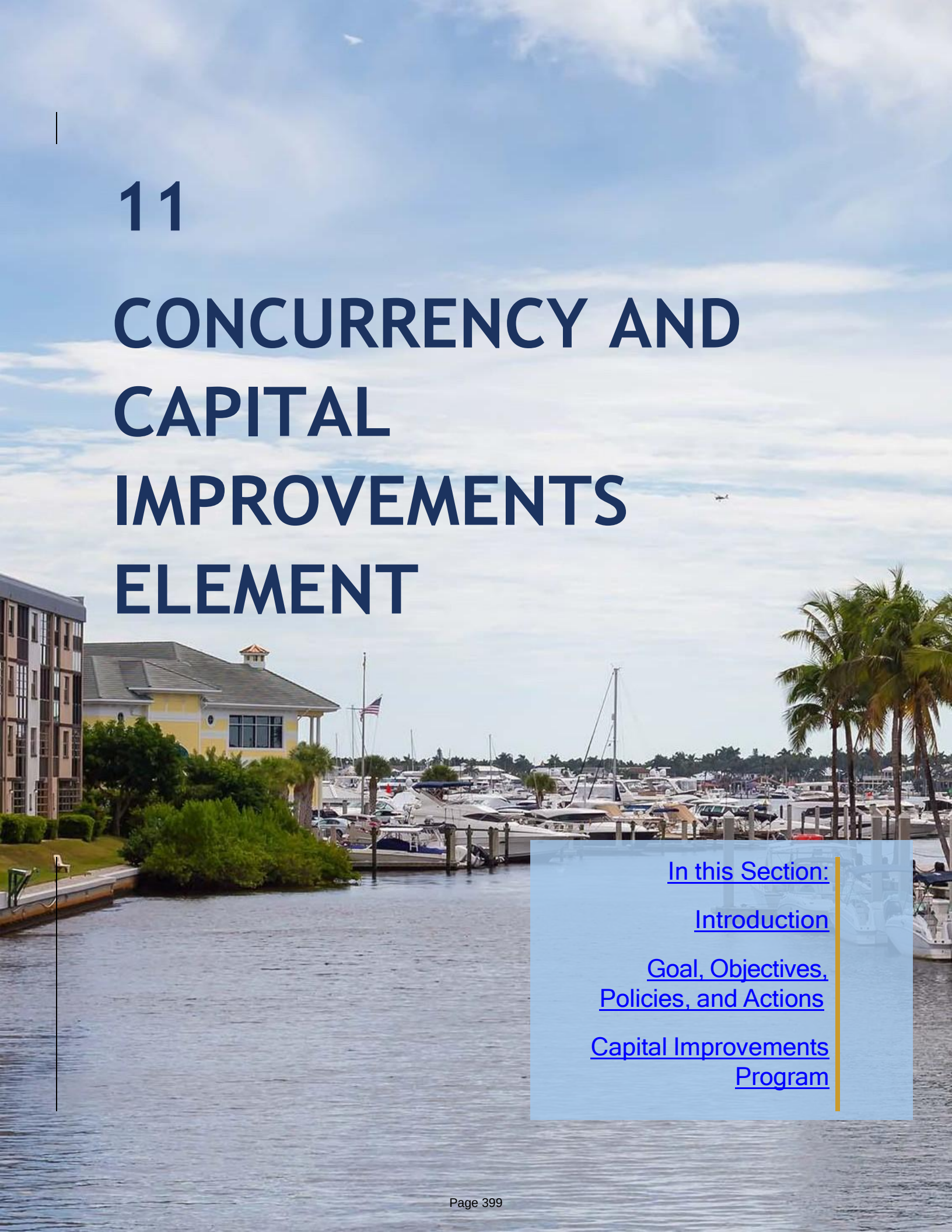
Provide the same high level of service to residents and property owners in areas that are annexed that is provided to the current citizens of the City. ***[Moved from ICE Policy 4-3]***

Policy IC-46.4 Neighborhood Planning Process for Annexed Areas

Incorporate newly annexed areas into the neighborhood planning process in order to identify and address specific areas of public concern within newly annexed neighborhoods ***[Moved from ICE Policy 4-4]*** (See also the Future Land Use Element, Objective FLU-7 and the Concurrency and Capital Improvements Element, Action CCI-1.1.5).

Policy IC-46.5 Future Land Use to Zoning Conversion for Annexed Areas

Maintain the zoning conversion chart as shown in the Future Land Use Element. ***[Moved from ICE Policy 4-5]***



11

CONCURRENCY AND CAPITAL IMPROVEMENTS ELEMENT

In this Section:

Introduction

Goal, Objectives, Policies, and Actions

Capital Improvements Program

INTRODUCTION

~~State Statutes no longer require "financial feasibility"; however, City Council requires that proposals contained in the Comprehensive Plan that require the expenditure of public funds for capital improvements will carry related fiscal considerations, including estimated costs, priority ranking relative to other proposed capital expenditures, proposed funding sources, and estimated annual operating costs.~~ The **Concurrency Management and Capital Improvements Element** establishes the framework by which the City ensures that public facilities and infrastructure needed to support development are available concurrent with the impacts of such development, consistent with Chapter 163, Part II, Florida Statutes (Community Planning Act), and the concurrency requirements set forth in Section 163.3180, Florida Statutes. This Element promotes fiscally responsible growth, maintains adopted levels of service, and aligns infrastructure investments with the City's long-term planning objectives and resilience goals.

Pursuant to Section 163.3180, Florida Statutes, the City maintains a concurrency management system that links land use decisions to the availability of public facilities and services. The City applies concurrency to potable water, sanitary sewer, solid waste and drainage facilities as required by the state, but also applies it to additional facilities including transportation, parks and recreation, and public schools. This Element establishes the level of service standards to ensure that public facilities and infrastructure needed to support development are available, or that necessary improvements are planned and funded to meet such standards within the applicable timeframes.

The Concurrency and Capital Improvements Element identifies, prioritizes, and funds projects necessary to implement the Comprehensive Plan and to ensure the timely provision of public facilities. Specific capital improvements are ~~routinely~~ planned for and updated annually ~~anticipated~~ in the ~~City's Annual~~ Five-Year Capital Improvements Program (CIP) to ensure financial feasibility and reflect evolving infrastructure needs, revenue projections, and priorities. The Five-Year CIP is internally consistent with the implementation of the twenty-year planning time frame of this Comprehensive Plan. The CIP is a well-established program and has successfully served the City's needs for many years. It is intended that the CIP be utilized as a principal method for implementing the Comprehensive Plan. In this regard, projects proposed in the annual CIP are reviewed for consistency with the adopted Comprehensive Plan ~~and reviewed by the Planning Advisory Board~~.

In meeting the needs of the City's future growth, ~~and~~ redevelopment, and resiliency, certain capital improvements will increase the tax burden for City residents. ~~In order to~~ To minimize this burden, the City will continue to implement existing and explore new programs to ensure that new growth and redevelopment assumes financial responsibility for its impact. As a coastal community located in Collier County along the Gulf, the City recognizes the importance of integrating resilience into infrastructure planning to address risks associated with flooding,

storm surge, sea level rise, and other extreme weather events. With data generated from the City's Critical Assets and Facilities Vulnerability Assessment (2023) and the Critical Assets and Facilities Adaptation Plan (2024), and subsequent resiliency-related planning efforts, the City can also better incorporate current and future flood risk impacts and response into its CIP process, which may include adaptation or relocation of facilities. The City should maximize the use of equitable funding methods, such as impact fees, user fees, special assessments or taxing districts, grants, and the like, to accommodate the costs of new development, ~~and~~ redevelopment, and resiliency, and to ensure the lowest possible tax burden on City residents.

Concurrency and capital planning efforts shall be coordinated with relevant governmental entities. The City shall collaborate with Collier County, regional agencies, and state and federal organizations to maximize funding opportunities and to plan for and maintain shared infrastructure systems.

Through this Element, the City affirms its commitment to coordinating land use, infrastructure planning, and resilience to ensure the provision of adequate public facilities, protect public health and safety, and support sustainable and orderly development.

GOAL, OBJECTIVES, ~~AND~~ POLICIES, AND ACTIONS

The following goal, objectives, ~~and~~ policies, and actions address the pertinent issues for the Concurrency and Capital Improvements Element and the mechanisms to implement the Five-Year Capital Improvements Program (CIP). They are intended to plan for the future, correct deficiencies, meet the level of service standards, adapt or relocate facilities, and fund additional projects.

Unless otherwise stated, the objectives in this element will be implemented within the five-year time frame considering the ten- and twenty-year Comprehensive Plan planning horizons ~~timeframe~~.

GOAL

~~Provide the community with necessary services and facilities and maintain while maintaining sufficient flexibility to meet the challenges associated with accommodate growth and redevelopment, and to respond to evolving resilience needs.~~

Proactively deliver modern, resilient, facilities and public services that adapt to ongoing growth and redevelopment while future-proofing our infrastructure against changing weather realities and evolving landscapes. This shall be done by responsible fiscal planning , proactive maintenance and modernization of ageing infrastructure, and strategic capital investments that address existing deficiencies, support future needs, and preserve the quality of life of Naples residents.



Objective CCI-1 Annual Capital Improvements Program Review

Conduct a review of community needs each year and analyze potential revenues to balance the proposed Capital Improvements Program costs.

Policy CCI-1.1 Annually Update Five-Year Capital Improvements Program

~~The City of Naples Financial Policy defines the term "capital improvement" as follows; Capital improvement projects are defined as infrastructure or equipment purchases or construction which results in a capitalized asset costing more than $10,000 and having a useful (depreciable life) of two years or more.~~ On an annual basis, the City must adopt by ordinance a Five-Year Capital Improvements Program, including a Five-Year Schedule of Capital Improvements, which shall include projects in the Level of Service Report. ***[Moved from CMSE Policy 1-3 and revised as noted]***

Policy CCI-1.2 Updates Adopted by Ordinance

Updates to the Five-Year Schedule of Capital Improvements may be adopted by ordinance and shall not be considered amendments to the Comprehensive Plan, consistent with Section 163.3187, Florida Statutes.

> **Action CCI-1.2.1** During the annual update of the Five-Year Capital Improvements Program, such improvements, as defined in the "City of Naples Financial Policy," shall be included in the schedule. Capital improvements determined to be necessary to implement the goals, objectives, and policies of this Comprehensive Plan shall be given priority.

> ~~Policy 1.2~~ **Action CCI-1.2.2** Annually, department managers will identify capital projects needed to eliminate existing capacity deficits or implement the goals, objectives, and policies of this Comprehensive Plan. The Finance Department is responsible for determining financial feasibility.

> ~~Policy 1.6~~ **Action CCI-1.2.3** Adopt by ordinance an annual capital budget as part of the Five-Year Capital Improvements Program.

> **Action CCI-1.2.4** Capital projects identified through the Neighborhood Planning process will be reviewed for incorporation in the Capital Improvements Plan on an annual basis (See Objective FLU-7 in the Future Land Use Element and Housing Element Policy H-3.4).[1]
>
> Capital projects identified through the Neighborhood Planning process, including documented infrastructure deficiencies and priorities identified through consultation with residents and neighborhood associations, shall be evaluated annually for incorporation into the Five-Year Capital Improvements Program. The City should provide opportunities for affected neighborhoods to participate in identifying and prioritizing infrastructure improvements.

Policy CCI-1.3 Encourage Recycled Materials

Encourage the use of recycled materials in projects funded through the City's Capital Improvements Program.

[1] New action to support establishment of Neighborhood Planning Process as directed by City Council.

Policy CCI-1.4 Comply with Debt Service Coverage Requirements

Maintain compliance with debt service coverage requirements. ~~In the Water and Sewer Enterprise Fund, bond covenants require that net revenues be a minimum of one hundred thirty-five percent (135%) of annual debt service requirements.~~

Policy CCI-1.5 Comply with Debt Service Limitations

Maintain compliance with debt service limitations in the Capital Improvements Fund. ~~By resolution of the City Council, annual debt service obligations may not exceed forty-five percent (45%) of the budgeted revenues of the fund.~~

Policy CCI-1.~~7~~ 6 Adopt by Reference School District's Five-Year Capital Improvement Plan

The City adopts by reference, into this Concurrency and Capital Improvements Element, the School District's updated Five-Year Capital Improvement Plan as adopted annually by the District School Board of Collier County by October 1st of each year, which identifies the school facility capacity projects necessary to address existing deficiencies and future needs based upon achieving and maintaining the adopted LOS standard for schools. ***[Moved from the Public School Facilities Element, Objective 1-4 (Capital Improvements) and Policy 1-4.1]***

Policy CCI-1.~~8~~7 Annually Review Concurrency and Capital Improvements Element

The ~~capital improvements element~~ Concurrency and Capital Improvements Element must be reviewed on an annual basis and modified as necessary ~~in order to maintain consistency with the City's CIP and level of service standards~~ to ensure that the five-year schedule of capital improvements remains current, financially feasible, and consistent with the goals, objectives, policies, and actions of the Comprehensive Plan.

Policy CCI-1.~~9~~8 Correct Existing Deficiencies

~~Future development will bear proportionate costs of facility improvements as needed to accommodate the development and to maintain level of service standards. Proportionate costs will be based on established impact fees for roadways (including traffic calming), police, fire, parks and recreation, and general government. System development charges established for water and sewer services assure that future development will contribute to the costs of new facilities for those services.~~ Correction of existing deficiencies in specific areas of the community will be made using funding mechanisms such as user fees, special assessments or taxing districts, grants, and the like, so that the costs of existing deficiencies and of worn out or obsolete facilities are equitably shared and new development pays for its impacts. This will ~~ensure~~ deliver maximum value for taxpayers by balancing fiscal prudence with necessary investments in our city's future. ~~the lowest possible tax burden on City residents~~. ***[Moved from CIE Objective 2]***

Policy CCI-1.9 Revise Capital Improvements Program

Revise the Capital Improvements Program in the future to include projects and programs listed in the Comprehensive Plan which are in addition to those needed to maintain level of service standards, adapt or relocate public facilities, or to correct deficiencies if not correctly funded. ***[Moved from CIE Policy 4-5]***

Policy CCI-1.10 Fund Projects and Programs

In the absence of legal constraints on the use of revenues, projects and programs shall be funded to (these criteria are not listed in order of importance):

- Correct public hazards;
- Eliminate existing deficiencies as described by the minimum levels of service;
- Provide for the renewal and replacement of, and improvement to, existing public infrastructure and physical assets;
- Maintain levels of service as new growth occurs;
- Increase existing levels of service to desired levels of service; ~~and~~
- Manage for current and future flood risk and increase community resiliency to hazards and risks; and
- Implement the Goals, Objectives, ~~and~~ Policies, and Actions of other Plan Elements.
- Prioritize the repair, rehabilitation, and replacement of aging or vulnerable critical infrastructure based on documented condition assessments, public safety considerations, recurring infrastructure deficiencies, and the potential consequences of infrastructure failure.

Objective CCI-2 Levels of Service (LOS)

Public facilities including ~~roads~~ roadway facilities, sanitary sewer, solid waste, drainage, potable water, parks and recreation, and public schools will be provided at the adopted level of service standards. ***[Moved from CMSE Objective 1]***

Policy CCI-2.1 Adopted Level of Service Standards *[Moved from CMSE Policy 1-1]*

The adopted level of service standard for each public facility category is outlined below:

Sanitary Sewer: Treatment capacity of 150 gallons per capita, per day.

Potable Water: Provide and treat 300 gallons per capita, per day.

Solid Waste: 1.10 tons per capita, per year.

Parks and Recreation

PARKLANDS

TYPE	LEVEL OF SERVICE
Community Parks*	2 acres/1,000 population
Neighborhood, Linear, and Mini Parks	1 acre/1,000 population

RECREATION FACILITIES

FACILITY	LEVEL OF SERVICE
Basketball Courts	1/5,000 persons
Baseball Fields	1/5,000 persons
Beach Access Points	1/1,000 persons

Boat Launch/Ramps	1/9,000 persons

FACILITY	LEVEL OF SERVICE
Bike Lanes and Routes	1 mile /1,500 persons
Community Centers	1/9,000 persons
Football Fields	1/ 11,000 persons
Picnic Areas	1/5,000 persons
Play Areas (Playgrounds)	1/6,000 persons
Swimming Pools	1/ 25,000 persons
Tennis Courts	1/ ~~5,000~~ 2,000 persons
Volleyball Courts	1/4,000 persons
~~**Physical Fitness**~~ **Trails**	1acre/5,000 persons

Roadway~~s~~ Facilities

Maintain Level of Service (LOS) C peak season volume for ~~the City Collectors~~ all roadways based on ~~the 100th hourly volumes design~~FDOT Context Sensitive Level of Service Tables, except for Fifth Avenue South between U.S. 41 and Gulf Shore Boulevard, which ~~The excepted length of Fifth Avenue South~~ has been defined as a "constrained facility." For County maintained roads (Goodlette-Frank Road~~,~~ and Golden Gate Parkway~~)~~, ~~within the City limits, the City shall adopt the County's level of service~~ E. ~~These County roads for 2010 are set at LOS E. For~~ and ~~the~~ State roads within the City limits (U.S. 41 [S.R. 45 & S.R. 90]), the City ~~shall be consistent with Collier County and~~ adopts LOS ~~E~~ standards applied by those jurisdictions. ~~LOS for City collectors shall be measured by traffic counts at peak hour, peak season. (See Support Document for LOS data.)~~ (See also Objective T-4 in the Transportation Element.)

DRAINAGE

CATEGORY	STANDARD
Roadway and Yard	5 Year -1 Hour
Pump Stations	5 Year -1 Hour
Trunk Lines	5 Year -1 Hour
~~**Flood Protection - Building Elevation**~~	~~100 Year~~
~~**Water Quality**~~	~~**Wet Retention**~~ ~~Best Management Practices (refer to Public Facilities and Water Resources Element Policy 1.)~~ ~~**Dry Retention**~~ ~~1.25" Minimum~~ ~~**Retention** 0.5" Minimum~~

The level of service standard for surface water management for all development, redevelopment and the City's primary drainage system requires no flooding during a 5-year, 1-hour storm event for roads, yard drainage, pump stations and trunk lines and requires no flooding during a 100-year storm event for building finished floors elevations (See also the Public Facilities and Water Resources Element, Policy PFWR-1.10).[2] Established stormwater level of service standards shall be the more stringent of this level of service or the stormwater design standards set by the South Florida Water Management District (SFWMD).

A. Unless otherwise specified by previous SFWMD permits or District criteria, a storm event of 1-hour duration and 5-year return frequency will be used in computing the minimum off-site discharge rates from private properties to the City's stormwater system. The stormwater conveyance system should be designed sufficiently so that the conveyance will pass the design flow while ensuring that the backwater head does not exceed the proposed berms, walls or other containment systems in a 25-year, 24-hour storm event. The side lot swales and other emergency conveyance facilities may be designed to pass the water forward to the public right-of-way.

B. Unless otherwise specified by previous SFWMD permits or District criteria, water quality standards will be determined based upon selecting the most appropriate pollutant removal presumption to the corresponding BMP technique. The BMP guidelines used must meet a presumed pollutant removal of 85% Total Suspended Solids (TSS), Total Nitrogen (TN), and Total Phosphorus (TP). Innovative approaches and Low Impact Development (LID) techniques that reduce percent impervious are encouraged. When a retention system is used in conjunction with approved BMP's, a reduction in storage volume may be provided by City of Naples Code Section 16-115.

C. Stormwater systems shall be designed to be functional for all tailwater conditions that may be encountered by events equal in frequency to the level of service or by SFWMD, whichever is more stringent.. This may entail consideration of storm durations different than the current standard 5 year-1 hour storm event. Variable tailwater stages should be considered if they have a significant influence on the design. Minimum Tailwater Elevation is required as adopted in the Code of Ordinances and/or the most recent version of the Stormwater Ordinance Standards and/or Handbook, as amended. Applicants may propose alternative tailwater elevations due to site-specific constraints for approval by the City, but should take into account current and future conditions at the receiving water.

PUBLIC SCHOOL FACILITIES

FACILITY	LEVEL OF SERVICE
Elementary Schools	95% of CSA Enrollment/FISH Capacity
Middle Schools	95% of CSA Enrollment/FISH Capacity
High Schools	100% of CSA Enrollment/FISH Capacity

[2] Language mirrors Public Facilities & Water Resources Element Policy 1-10, carried forward.

NOTE: CSA = Concurrency Service Area

FISH= Florida Inventory of School Houses

Policy CCI-2.2 Annually Prepare a Level of Service Report for Public Facilities

~~On an annual basis, the~~ The City ~~Planning Department~~ will ~~prepare~~ monitor and annually prepare a Level of Service Report on meeting the adopted levels of service for public facilities to ensure facilities and services are provided concurrently with new development ~~an annual~~ and update ~~of~~ the Concurrency and Capital Improvements Element as needed to address recommended measures to meet or modify the adopted levels of service standards~~which will include an analysis of all public facilities for which level of service standards have been established.~~

Policy CCI-2.3 Update Stormwater LOS Standards

Within one year of completion of the 2026 Watershed Master Plan, the City shall review its Stormwater Management System and update the LOS standards as needed.

Within one year of completion of the 2026 Watershed Master Plan, the City shall review its Stormwater Management System and update applicable level-of-service standards as needed. The review should consider existing drainage deficiencies, infrastructure conditions, current and projected flood risks, and the anticipated impacts of changing rainfall and coastal conditions. Identified infrastructure improvements should be evaluated and prioritized for inclusion in the City's Five-Year Capital Improvements Program.

Policy CCI-2.4 Update Parks and Recreation LOS Standards

Within one year of completion of the 2026 Parks and Recreation Master Plan, the City shall review and update the LOS standards as needed.

Objective CCI-~~2~~3 Concurrency Management System

~~Future~~ New development and redevelopment will ensure the necessary public facilities and services will be available ~~development will bear proportionate costs of facility improvements~~ as needed ~~to accommodate~~ concurrent with the impacts of the development and to maintain adopted level of service standards. Proportionate costs will be based on established impact fees for roadways (including traffic calming), police, fire, and parks and recreation, ~~and general government~~ and implemented through the Code of Ordinances. System development charges established for water and sewer services ~~assure~~ensure that future development will contribute to the costs of new facilities for those services. ***[Moved from CIE Objective 2]***

Policy CCI-~~2.~~3.1 Evaluate Public Facility Demands

Evaluate public facility demands by new development or redevelopment on a project-by-project basis to assure that capital facilities are provided concurrent with development.

Policy CCI-~~2.~~3.2 Determine Public Facility Improvements

Determine location demands for public facility improvements during the Capital Improvements Program review process and list specific projects in ~~Capital Improvements Element during the~~

~~annual amendment process~~ the annually adopted Five-Year Schedule of Capital Improvements.

~~**Policy 2.3**~~

~~Annually evaluate neighborhoods to identify capital projects to include in the Five-Year CIP~~.
[Deleted and reworded to CCI Action 1.2.4 as directed by City Council]

Policy CCI-~~2.4~~3.3 Review Impacts of Proposed Development

Circulate review petitions from the Planning Department to each department for review of the impacts of the proposed development on public facilities.

Policy CCI-~~2.5~~ 3.4 Update Impact Fee Studies

Update impact fee studies on a periodic basis to assure that fees remain proportional and reasonably connected to, or a rational nexus with, capital needs caused by new development.

~~**Policy 2.6**~~

~~Evaluate a program which would provide impact fee credits or other tax preferences for the inclusion of "smart building" standards in new development.~~[3]

~~**Policy 2.7**~~

~~Permit the use of water system development charges for groundwater aquifer protection programs.~~ [4]

Policy CCI-~~2.8~~3.5 Evaluate and Update Beach Parking and Recreation Fee Schedule Interlocal Agreement

On a periodic basis, evaluate and update as applicable the interlocal agreement for beach parking and recreation fee schedule. The review must include an examination of resident and non-resident recreation fees.



Objective CCI-~~3~~4 Sewer and Water Service

Review all proposed development and redevelopment in the City's sewer and water service area to ensure that development does not exceed the ability of the City to provide needed capital improvements ~~of the City~~. Capital facility needs must be provided concurrent with the impacts of development.

Policy CCI-~~3~~4.1 Assure Necessary Public Facilities

Assure that necessary sewer and water public facilities will be in place, or provided for, concurrent with proposed or previously approved development.

Policy CCI-~~3~~4.2 Complete Service and Delivery Improvements

Complete sewer and water service and delivery improvements and require new development to utilize such services within the level of service standards of said facility service area.

[3] Deleted per PAB suggestion.

[4] Deleted per PAB suggestion.

Policy CCI-~~3~~4.3 Allow Phased Development Projects

Allow phased development projects, or phasing sewer and water public facilities, which will be available and in place and concurrent with the impacts of development ~~in order~~ to mitigate development impacts on public facilities.

Objective CCI-~~4~~5 Coordination of Land Use Decisions



On an annual basis, the City will review land development and land use decisions, fiscal resources, capital facilities, current and future flood risk data, and growth to determine the impact of these decisions on the level of service and identify capital improvements needed to maintain level of service standards for public facilities and to meet future growth needs, including adaptation or relocation of public facilities.

Such evaluations should consider the cumulative impacts of development and redevelopment on existing infrastructure, including stormwater systems, transportation networks, utilities, and public services, particularly within established residential neighborhoods.

Policy CCI-~~4~~5.1 Annually Project Population Growth

~~Project population growth~~Monitor and project population trends on an annual basis to ~~measure~~ evaluate level of service demands.

Policy CCI-~~4~~5.2 Evaluate Development Trends

Evaluate past development trends and current development activity to serve as a measure of future land use and public facility needs.

Policy CCI-~~4~~5.3 Maintain Land Use Inventory

Maintain an inventory of vacant land use data ~~in order~~ to determine ability to meet future growth needs.

Policy CCI-~~4~~5.4 Review Growth and Land Use Projects for Public Facilities and Fiscal Impacts

Review growth and land use projections over the 10-year (2035) and 20-year planning horizons (2045) with each department to evaluate future demands for public facilities and fiscal impacts.

~~Policy 4.5~~

~~Revise the Capital Improvements Program in the future to include projects and programs listed in the Comprehensive Plan which are in addition to those needed to maintain level of service standards or to correct deficiencies if not correctly funded.~~ ***[Moved to Policy CCI-1.9]***

Policy CCI-~~4.6~~ 5.5 Coordinate Data for LOS Standards

The Planning Department will coordinate the data and analysis needed to ~~measure~~ evaluate the maintenance of level of service standar3=ds. This shall include consideration of data from the City's Vulnerability and Adaptation planning efforts in determining public facilities needs to address current and future flood risk and the ability to meet adopted levels of service or the need to modify levels of service in response to various types of flood risk.





Objective CCI-~~5~~6 Capital Improvements Program

Utilize the Concurrency and Capital Improvements Element in the annual preparation of the Capital Improvements Program to designate the means to fund and construct capital facility improvements stipulated by the level of service standards in this Plan, including replacing deficiencies, adaptation or relocation, and accommodations for the needs of population growth. (See also Policy PROS-5.2 in the Parks, Recreation, and Open Space Element.)

Policy CCI-~~5~~6.1 Annually Review Capacity Needs

~~Eliminate~~ Maintain high service standards by identifying, evaluating, and eliminating deficiencies and~~by annually reviewing~~ capacity ~~needs~~gaps across ~~of each~~ City departments and public facilities ~~as related to public facility improvements and designate such needs in the Capital Improvements Program~~. ***[Portions of Policy moved to Action CCI-6.1.1]***

> **Action CCI-6.1.1** ~~Eliminate deficiencies by annually reviewing capacity needs of each City department as related to public facility improvements and designate such needs in~~ Update the Capital Improvements Program annually to reflect the documented facility and infrastructure needs of each City department. ***[Moved from CCI Policy 5-1]***

Policy CCI-~~5~~6.2 Evaluate Budget Impact

Evaluate the budget impact through the established Capital Improvements Program process to fund such public facility improvements, spreading the impact over the Five-Year Capital Improvements Program time period to assure fiscal sustainability.

Policy CCI-~~5~~6.3 Direct Expenditures to Capital Improvements

Direct expenditures to capital improvements as designated by policies of separate Comprehensive Plan elements, consistent with the Five-Year Schedule of Capital Improvements.

Policy CCI-~~5~~6.4 Maintaining Levels of Service

Public facility improvements will, at a minimum, be provided for as designated by the level of service standards in the Plan. ~~The level of service standards are identified in the Concurrency Management section of the Plan.~~

Policy CCI-~~5~~6.5 Determine Fiscal Sustainability of Capital Improvements Program

Utilize the departmental review process, public hearings with City Council, and Finance Department analysis to determine the fiscal sustainability of the Capital Improvements Program. Fiscal sustainability evaluations should consider the anticipated long-term operating, maintenance, rehabilitation, and replacement costs of proposed capital improvements, together with available funding sources and potential impacts on taxpayers.

Policy CCI-~~5~~6.6 Annual Capital Improvements Planning

Capital improvements identified in the ~~monitoring report~~ Annual Level of Service Report will be analyzed for financial feasibility and, if feasible, will be included in the Capital Improvements

Budget adopted annually.

Policy CCI-~~5~~6.7 Explore Other Funding Mechanisms

If a necessary project is not financially feasible to be funded by the City, explore other funding mechanisms to pay for that improvement as related to level of service or do not issue development permits for the project.

Policy CCI-~~5~~6.8 Capital Improvements Program Coordination

Coordinate the Capital Improvements Program with ~~any and~~ all agencies that provide public facilities to the City, including Collier County, pertinent state agencies or utility service providers, and the South Florida Water Management District. The City will also participate in the plans of any agency providing public facilities within the City to ensure coordination in the Capital Improvements Program budgeting process.

Policy CCI-~~5~~6.9 Evaluation of Capital Facilities Improvements

Development of the Capital Improvements Program will include an evaluation of the need for replacement and renewal, adaptation or relocation of capital facilities.

Policy CCI-~~5~~6.10 Adopt Roadway Construction Program

The City must adopt on an annual basis a roadway construction program using proceeds from the ~~five cent~~ local option gasoline tax.

Policy CCI-~~5~~6.11 Achieve Pollutant Load Reductions

When applicable, the City of Naples shall include within its Schedule of Capital Improvements a list of projects necessary to achieve the pollutant load reductions attributable to the City of Naples, as established in a basin management action plan.



Objective CCI-~~6~~7 Public Expenditures in Coastal High Hazard Areas

~~Public expenditures that subsidize development or redevelopment in high hazard areas will only be permitted to service density levels as determined by the Future Land Use Map and permitted by the Code of Ordinances~~ Limit public expenditures that subsidize development in coastal high hazard areas.

Policy CCI-~~6~~7.1 Direct State and Federal Funds Away from High Hazard Areas

Direct projects which are funded by state or federal assistance away from coastal high hazard areas, ~~with the exception of~~except for water dependent uses, ~~and~~ enhancement and protection of natural resources, or those that adapt or relocate public facilities.

Policy CCI-~~6~~7.2 Direct New Population Growth Away from Coastal High-~~-~~Hazard Areas with Exceptions

Direct new population growth away from known or predicted coastal high hazard areas except: (1) mixed use projects which further economic development and revitalization efforts in the Downtown Mixed Use and Limited Commercial designations; ~~and~~ (2) residential development in compliance with the Future Land Use Map and zoned densities~~.~~; or (3) projects that demonstrate they can be constructed to meet current and future flood risk.



Objective CCI-8 School Coordination

The City of Naples shall coordinate with the school district through an interlocal agreement to adopt and maintain a school concurrency management system to provide school capacity at an adopted level of service standard, measured within School Concurrency Service Area's (CSAs) for each school type (elementary, middle, high) for the long term and five-year planning periods. ***[Moved from Public School Facilities Element Objective 1.1]*** (See Policy IC-2.1 and related actions and Objective IC-3 and related policies and actions in Intergovernmental Coordination Element.)

Policy CCI-8.1 LOS Standards for CSAs

Level of Service (LOS) standards for CSAs shall be based upon permanent FISH capacity: 100% for high school CSAs; 95% for elementary school CSAs; and 95% for middle school CSAs. ***[Moved from Public School Facilities Element Policy 1.1.1]***

Policy CCI-8.2 Establish School CSAs

School CSAs shall be established less than district-wide through the merger of Traffic Analysis Zones (TAZs) to establish separate elementary school, middle school, and high schools CSAs against which to measure the level of service standard. ***[Moved from Public School Facilities Element Policy 1.1.2]***

Policy CCI-8.3 Changes to CSA Boundaries *[Moved from Public School Facilities Element Policy 1.1.3]*

Prior to adopting any change to the CSA boundaries, the City shall require that the School District verify that ~~as a result~~because of the change:

- The adopted LOS standards will be achieved and maintained within the five-year planning period; and
- The utilization of school capacity will be maximized to the greatest extent possible~~,~~ ~~taking into account~~ considering transportation costs, court approved desegregation plans, and other relevant factors.

Policy CCI-8.4 Process for Modifying CSA Boundary Maps *[Moved from Public School Facilities Element Policy 1.1.4]*

The City, in conjunction with the School District, the County and other municipalities within the County shall observe the following process for modifying CSA boundary maps:

- The School District, in coordination with local governments, shall review the proposed CSA boundaries and the data and analysis used to support the change, and determine whether ~~or not~~ a change is appropriate considering criteria established in Policy CCI-~~1-1.3~~8-3. The School District shall transmit supporting data and analysis to the local government for review and comment.
- Local governments shall review and comment on the proposed changes within forty-five (45) days of receipt.
- If the proposed change is acceptable to the local government, the change to a CSA boundary shall become effective upon final approval of the new CSA boundary map by the School Board. ~~New maps of the CSA boundaries shall also be included as data and analysis in support of the local government PSFEs.~~

CAPITAL IMPROVEMENTS PROGRAM

This document incorporates the City's ~~current Capital Improvements and~~ current Capital Improvements Program or Five-Year Schedule of Capital Improvements ~~as it~~, which is updated and adopted by City Council on an annual basis. This element will be reviewed and updated as necessary in accordance with Section 163.3177(3)(b) F.S., as amended. While some of the City's capital projects listed further the goals, objectives, ~~and~~ policies, and actions of the Comprehensive Plan, none of the improvements are required to meet level of service standards in the next five years.

CITY OF NAPLES
FIVE YEAR CAPITAL IMPROVEMENT PROJECTS OVERVIEW
ALL FUNDS

	Amended Budget 2024-25	Request 2025-26	2026-27	2027-28	2028-29	2029-30
Public Service Tax/Capital Projects Fund						
Administrative Departments	0	0	0	0	0	0
Police Department	1,727,521	1,800,919	2,213,369	2,255,847	2,466,847	2,043,879
Fire Rescue Department	1,611,000	2,505,000	31,555,000	2,100,000	2,823,000	2,000,000
Parks, Recreation & Facilities	1,685,000	4,725,000	3,500,000	3,305,000	3,625,000	1,700,000
Public Service Tax Fund Subtotal	**5,023,521**	**9,030,919**	**37,268,369**	**7,660,847**	**8,914,847**	**5,743,879**
Water Sewer Fund	14,100,000	18,440,000	70,145,000	28,975,000	9,005,000	16,119,000
Building Permits Fund	35,000	320,000	35,000	35,000	35,000	35,000
Community Redevelop. Agency (CRA)	7,632,500	13,209,000	16,270,950	5,400,000	9,100,000	8,100,000
Streets & Traffic Fund	1,650,000	2,600,000	2,225,000	1,475,000	1,225,000	2,225,000
General Fund	750,000	4,500,000	0	200,000	2,300,000	180,000
Solid Waste Fund	1,415,000	1,115,000	1,415,000	1,115,000	1,115,000	1,175,000
Stormwater Fund	2,355,000	7,305,000	20,205,000	67,770,000	6,850,000	3,400,000
Tennis Fund	75,000	80,000	100,000	100,000	100,000	100,000
Beach Fund	368,000	490,500	338,000	340,000	342,000	245,000
Dock Fund	0	1,115,000	100,000	100,000	0	0
Technology Services Fund	730,000	795,000	875,000	795,000	980,000	1,420,000
Equipment Services	1,500,000	100,000	350,000	105,000	0	40,000
Baker Park Fund	950,000	0	0	0	0	0
One Cent Sales Tax	14,747,290	0	0	0	0	0
TOTAL ALL CAPITAL PROJECTS	**51,331,311**	**59,100,419**	**149,327,319**	**114,070,847**	**39,966,847**	**38,782,879**

Five Year Total	$401,248,311

The above list shows, by funding source, the projected Five Year Capital Improvement Program. For reference, the current budget of FY 24-25 is provided.

Adopted 9/17/2025
2026 Annual Update Pending

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CAPITAL PROJECTS - ALL FUNDS
FISCAL YEARS 2026-2030

CIP NUMBER	PROJECT DESCRIPTION	AMENDED BUDGET 2024-25	REQUEST 2025-26	2026-27	2027-28	2028-29	2029-30
POLICE SERVICES							
26H12	Axon Equipment (Tasers, Body Worn Cameras)	273,614	304,421	304,421	304,421	304,421	304,421
26H13	In Car Camera Replacements	76,164	76,164	76,164	76,164	76,164	76,164
26H01	Marked Vehicle Replacement (4)	92,000	300,000	540,750	318,270	273,682	253,250
26H03	Unmarked Police Vehicle Replacement (1)	100,000	63,000	226,600	291,748	240,400	123,810
26H24	Marked Vehicles - New (6)	0	268,000	600,600	660,660	726,726	0
26H08	Unmarked Vehicles - New (2)	150,000	126,100	0	58,350	0	0
26H09	Mobile Data/Laptop Computer Replacements (7)	156,243	70,000	0	0	0	0
26H20	LPR Camera Replacements/Upgrade	119,000	235,000	200,000	200,000	200,000	200,000
26H10	Axon Drone Sense	0	13,256	13,256	13,256	13,256	13,256
26H17	Axon Virtual Reality Training Equipment & Software	0	34,978	22,978	22,978	22,978	22,978
26H05	AED Replacements & Accessories	64,712	10,000	10,000	10,000	10,000	30,000
26H11	Communications Furniture/Desk Motors	19,081	63,000	0	0	0	0
26H07	Swat Night Vision Equipment (2)	0	45,000	40,000	0	0	0
	Motorcycle Replacement (2)	0	0	100,000	0	0	0
	Marine Outboard Motor Replacement: (2)	0	0	55,000	0	0	0
	CSI Photography Equipment Replacement	0	0	10,000	0	0	0
	Ballistic Helmet Replacement (34)	0	0	13,600	0	0	0
	Facility Lighting Replacement	0	0	0	10,000	0	0
	Enclosed Trailer	0	0	0	20,000	0	0
	Marine Vessel Replacement: (1)	0	0	0	240,000	0	0
	Tactical Body Armor & Helmet Replacement (6)	10,288	0	0	30,000	0	0
	Drone - SUAS Replacements and Accessories (2)	82,000	0	0	0	99,220	0
	Ballroom, Stairwell, Locker Room Renovations	0	0	0	0	500,000	0
	Building Wind and Flood Mitigation	0	0	0	0	0	450,000
	Police Specialty Vehicle (Swat)	0	0	0	0	0	300,000
	Portable Radio Replacement & Services	450,000	0	0	0	0	270,000
	Mobile Radio Replacement	20,000	0	0	0	0	0
	Secure Digital Storage (RAID)	30,000	0	0	0	0	0
	SIU Tech & Surveilance Equipment	25,000	0	0	0	0	0
	Police Building Master Re-Key / Security	15,000	0	0	0	0	0
	COP Furniture Replacement	29,419	0	0	0	0	0
	Parking Lot Lighting Enhancements	15,000	0	0	0	0	0
TOTAL POLICE DEPARTMENT		1,727,521	1,800,919	2,213,369	2,255,847	2,466,847	2,043,879
FIRE AND RESCUE DEPARTMENT							
25E02	Engine	0	1,000,000	0	0	0	0
25E01	Staff vehicles - Renamed CH01 to Bat 5 and FM (2)	0	200,000	0	0	0	0
25E13	Thermal Imagers	16,000	100,000	0	0	0	0
25E04	Retro fit apparatus with hard locks	0	40,000	0	0	0	0
25E06	Technical Rescue Equipment	0	65,000	65,000	0	0	0
25E09	Emergency Services Marine Dock	0	100,000	500,000	0	0	0
25E22	New Fire Station #2	1,200,000	1,000,000	29,000,000	0	0	0
	Public Safety Training Facility	0	0	800,000	0	0	0
	Bunker Gear Replacement	0	0	90,000	100,000	120,000	0
	Engine Co. 1 - Fully Equipped (Repl.)	0	0	1,100,000	0	0	0
	Ladder One fully equipped replacement	0	0	0	1,500,000	0	0
	Zoll heart monitors	0	0	0	500,000	0	0
	Engine Co. 2 - Fully Equipped (Repl)	0	0	0	0	1,500,000	0
	Fire boat 15yr replacement	0	0	0	0	1,000,000	0
	K-Saws / Chainsaws	0	0	0	0	28,000	0
	Battalion 1 (fully outfitted)	0	0	0	0	175,000	0
	Assistant Fire Marshal Vehicle (new)	80,000	0	0	0	0	0
	SCBA Masks and Regulators	120,000	0	0	0	0	0
	Portable Radios	195,000	0	0	0	0	0
	Station One Renovation	0	0	0	0	0	250,000
	HVAC renovation at FS1	0	0	0	0	0	250,000
	Ocean rescue equipment	0	0	0	0	0	150,000
	Bat 6 and 7, Chief 3 (min equip needed)	0	0	0	0	0	350,000
	Squad replacement & equipment	0	0	0	0	0	1,000,000
TOTAL FIRE RESCUE		1,611,000	2,505,000	31,555,000	2,100,000	2,823,000	2,000,000

2025 Adopted 9/22/2025
Annual Update is pending

CAPITAL PROJECTS - ALL FUNDS
FISCAL YEARS 2026-2030

CIP NUMBER	PROJECT DESCRIPTION	AMENDED BUDGET 2024-25	REQUEST 2025-26	2026-27	2027-28	2028-29	2029-30
PARKS, RECREATION AND FACILITIES DEPARTMENT							
Landscaping/Parks & Parkways Continuing and New Projects							
26F03	Tree Planting and Replacement Program	250,000	300,000	300,000	300,000	300,000	300,000
26F32	Landscape Median Restoration	450,000	500,000	550,000	550,000	600,000	600,000
26F02	Small Equipment Replacement - Pk/Pkwys	35,000	85,000	50,000	50,000	50,000	50,000
26F07	Upgrade to Irrigation System - US 41 Medians	0	50,000	20,000	20,000	10,000	10,000
	Vehicle Replacement - Pk/Pkwys	65,000	0	65,000	65,000	65,000	65,000
	Urban Forest Tree Inventory Upcate	150,000	0	0	0	0	250,000
Recreation Facilities Continuing and New Projects							
26G03	River Park Aquatic Center Improvements	0	150,000	50,000	50,000	50,000	0
26G23	Skate Park Improvements	0	100,000	0	0	400,000	0
26G11	Fleischmann Park Improvements	250,000	300,000	1,000,000	500,000	1,800,000	200,000
26G21	Recreation Vehicle Purchase (1 SUV)	35,000	45,000	0	0	0	0
26G02	Baker Park Improvements	0	75,000	150,000	1,000,000	0	0
26G26	Seagate Park Tennis Court/Roquetball Resurface	0	50,000	0	0	0	0
26G04	Cambier Park Improvements	100,000	2,000,000	0	500,000	200,000	0
26G02	River Park Community Center & Park Improvements	0	750,000	100,000	100,000	25,000	0
	Norris Center Improvements	150,000	0	250,000	100,000	50,000	0
	Anthony Park Improvements	0	0	25,000	25,000	25,000	25,000
	Department Master Plan Update	200,000	0	0	0	0	200,000
	Naples Preserve Improvements	0	0	50,000	0	50,000	0
	Van Replacement (1) - Recreation (Norris)	0	0	30,000	0	0	0
City Facilities Continuing and New Projects							
26I05	Replacement Vehicle - Facilities Maintenance	0	60,000	60,000	45,000	0	0
26I01	HVAC Controls Upgrade - City Hall and NPD	0	250,000	0	0	0	0
	Elevator Modernizations	0	0	0	0	0	0
	New Parks, Recreation, and Facilities Building	0	0	600,000	0	0	0
TOTAL PARKS, RECREATION AND FACILITIES DEPT		**1,585,000**	**4,725,000**	**3,500,000**	**3,305,000**	**3,625,000**	**1,700,000**
TOTAL PUBLIC SERVICE TAX		**5,023,521**	**9,030,919**	**37,268,369**	**7,660,847**	**8,914,847**	**5,743,879**
WATER SEWER FUND (Fund 420)							
Water Production							
25K11	Water Treatment Plant Pumps	130,000	130,000	130,000	130,000	130,000	130,000
25K02	Infrastructure Repairs - Water Plant	100,000	100,000	100,000	100,000	100,000	100,000
25K57	Clearwell Rehabs (underground water storage)	225,000	500,000	750,000	1,000,000	0	0
25K03	Chlorine Gas to Bleach Conversion	505,000	1,600,000	0	0	0	0
25K15	Golden Gate Well Replacements (2 per year)	0	5,000,000	350,000	6,000,000	350,000	6,000,000
	Loader Replacement (Lime Operation)	0	0	130,000	0	0	0
	Service Truck Replacements (1)	0	0	0	45,000	0	0
	Filter Bed Replacement (2 per year)	0	0	0	0	0	250,000
	Vacuum Press Replacement	2,000,000	0	0	0	0	0
	TOTAL WATER PRODUCTION	**2,960,000**	**7,330,000**	**1,460,000**	**7,275,000**	**580,000**	**6,480,000**
Water Distribution							
25L02	Water Transmission Mains	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000
25L02	Improvements based on WDSMP	4,000,000	2,500,000	2,500,000	2,500,000	2,500,000	2,500,000
25L02	Water Transmission Mains (Stormwater Multi-Basin Imp	0	0	1,000,000	6,500,000	0	0
25L02	Water Transmission Mains (Unsewered Areas 1, 2, 3, 6)	0	0	21,000,000	0	0	0
25L06	Service Truck Replacements (1)	165,000	55,000	120,000	120,000	120,000	120,000
25L07	Service Truck - New Additions - (2 - F/Admin)	0	110,000	0	55,000	0	55,000
25L10	Utilities Administration Facility Improvements	0	425,000	0	45,000	75,000	1,500,000
25L08	Heavy Equipment Trailer Replacements (2)	0	30,000	0	0	0	17,000
	Collier County Transportation Improvements	0	0	1,000,000	0	0	0
	Equipment Awning	0	0	100,000	0	0	0
	Excavation Equipment Replacements (2)	150,000	0	0	0	0	0
	Pipe Locating Equipment - Ground Penetrating Radar	0	0	25,000	0	30,000	0
TOTAL WATER DISTRIBUTION		**5,815,000**	**4,620,000**	**27,245,000**	**10,720,000**	**4,225,000**	**5,692,000**

2026 Adopted 9/22/2025
Annual Update is pending

CAPITAL PROJECTS - ALL FUNDS
FISCAL YEARS 2026-2030

CIP NUMBER	PROJECT DESCRIPTION	AMENDED BUDGET 2024-25	REQUEST 2025-26	2026-27	2027-28	2028-29	2029-30
Wastewater Treatment							
26M07	Wastewater Treatment Plant Pumps	150,000	600,000	600,000	150,000	150,000	150,000
26M25	Infrastructure Repairs - Wastewater Plant	150,000	150,000	150,000	150,000	150,000	150,000
26M04	Chlorine Gas to Bleach Conversion	0	1,500,000	0	0	0	0
26M06	Biosolids Dewatering Replacement (Design)	0	300,000	TBD	TBD	0	0
	Service Truck Replacements (1 per year)	0	0	55,000	0	0	55,000
	Filter Bed Replacements (Filters 1, 2, & 3)	0	0	250,000	0	125,000	0
	Telehandler/Tractor Replacement	0	0	0	200,000	0	0
	NEW - Yard Tractor Purchase	0	0	0	110,000	0	0
	Blower Replacement (No. 5)	0	0	0	300,000	0	0
	Preliminary Interior Recoating & Gate Replacements	0	0	0	0	100,000	TBD
	Treatment Improvements (pending disinfect on byproduc	0	0	TBD	TBD	TBD	TBD
	Grit Pumps and Classifier Replacements	300,000	0	0	0	0	0
TOTAL WASTEWATER TREATMENT		**600,000**	**2,550,000**	**1,055,000**	**910,000**	**525,000**	**355,000**
Wastewater Collections							
26N04	Replace Sewer Mains, Laterals, etc.	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000	1,500,000
26N04	Replace Sewer Mains (Stormwater - Multi Basin Impv)	0	0	1,000,000	6,500,000	0	0
26N04	Improvements based on SCSMP	0	0	TBD	TBD	TBD	TBD
26N11	Service Truck Replacements (2)	200,000	175,000	120,000	120,000	120,000	120,000
26N06	Dewatering Pump Replacements	0	50,000	0	0	55,000	0
	Sanitary Sewer Installations (Unsewered Areas 1, 2, 3, 6	0	0	35,000,000	0	0	0
	Jet/Vacuum Truck (NEW - Addition)	0	0	650,000	0	0	0
	Heavy Equipment Trailer Replacement	0	0	15,000	0	0	17,000
	WWC Facility Improvements	75,000	0	TBD	TBD	0	0
	Televising Truck/Camera Equipment Replacement	575,000	0	0	0	0	0
	Excavator Equipment Replacements (2)	150,000	0	0	0	0	0
TOTAL WASTEWATER COLLECTIONS		**2,500,000**	**1,725,000**	**38,285,000**	**8,120,000**	**1,675,000**	**1,637,000**
Utilities Maintenance							
26X01	Replace/Upgrade Remote Pumping Facilities	400,000	400,000	400,000	400,000	400,000	400,000
26X02	Pump Station Improvements	500,000	500,000	500,000	500,000	500,000	500,000
26X22	Generator Replacements	175,000	180,000	125,000	125,000	125,000	125,000
26X04	Submersible Pump Replacements	250,000	250,000	250,000	250,000	250,000	250,000
26X07	Power Service Control Equipment Replacements	150,000	150,000	150,000	150,000	150,000	150,000
26X05	Service Truck Replacements (2)	150,000	110,000	150,000	150,000	150,000	150,000
26X09	SCADA/Telemetry/Computer Networking Improvements	400,000	425,000	125,000	125,000	225,000	125,000
	Equipment Awning Installations (equipment protection)	0	0	100,000	0	0	0
	Odor Control System Replacements	0	0	100,000	0	0	0
TOTAL UTILITIES MAINTENANCE		**2,025,000**	**2,015,000**	**1,900,000**	**1,700,000**	**1,800,000**	**1,700,000**
Utilities/Finance/Customer Service							
	Service Truck Replacements	0	0	0	50,000	0	55,000
TOTAL CUSTOMER SERVICE		**0**	**0**	**0**	**50,000**	**0**	**55,000**
IWRP (Integrated Water Resource Plan)							
26K59	Reclaimed Water Transmission Mains	200,000	200,000	200,000	200,000	200,000	200,000
	TOTAL IWRP	**200,000**	**200,000**	**200,000**	**200,000**	**200,000**	**200,000**
TOTAL UTILITIES FUND		**14,100,000**	**18,440,000**	**70,145,000**	**28,975,000**	**9,005,000**	**16,119,000**
BUILDING FUND (Fund 110)							
26B04	Vehicle Replacement Program	35,000	70,000	35,000	35,000	35,000	35,000
26B06	Elevator Modernization	0	250,000	0	0	0	0
TOTAL BUILDING FUND		**35,000**	**320,000**	**35,000**	**35,000**	**35,000**	**35,000**
COMMUNITY REDEVELOPMENT AGENCY-CRA (Fund 180)							
25C02	1st Ave S, 12th St S, 10th St N Improvements	0	8,854,000	9,670,950	0	0	0
25C04	Naples Design District Improvements	0	3,000,000	200,000	1,500,000	1,500,000	1,500,000
25C13	CP Security Enhancements Anthony Park Area	0	100,000	0	0	0	0
25C10	CP Security Enhancements Cambier Park	0	850,000	0	0	0	0
25C18	CRA Landscape technicians vehicle	0	65,000	0	0	0	0
25C14	Neighborhood Plans Projects	0	250,000	250,000	1,000,000	500,000	1,500,000
	CP Security Enhancement 4th Ave Garage/Sugden		90,000	0	0	0	0
	Street Improvements (Project Specific TBD)	0	0	0	400,000	1,000,000	2,500,000

2026 Adopted 9/29/2025 Annual Update Is Pending

CAPITAL PROJECTS - ALL FUNDS
FISCAL YEARS 2026-2030

CIP NUMBER	PROJECT DESCRIPTION	AMENDED BUDGET 2024-25	REQUEST 2025-26	2026-27	2027-28	2028-29	2029-30
	5th Ave S and Sugden Plaza Improvements	400,000	0	5,200,000	0	0	0
	Anthony Park Improvements	50,000	0	750,000	0	0	0
	Norris Center Improvements	0	0	200,000	0	0	0
	Stormwater Improvements	0	0	0	2,000,000	1,000,000	2,000,000
	Community Policing	0	0	0	0	100,000	100,000
	Park Improvements	0	0	0	500,000	0	500,000
	Additional Parking	0	0	0	0	5,000,000	0
	Affordable Housing Projects	4,085,000	0	0	0	0	0
	6th Avenue North Landscape	225,000	0	0	0	0	0
	Land Acquisition	2,000,000	0	0	0	0	0
	4th Avenue S garage painting and landscaping	345,000	0	0	0	0	0
	Community Police Vehicles	277,500	0	0	0	0	0
	River Park Improvements	100,000	0	0	0	0	0
	Baker Park Improvements	150,000	0	0	0	0	0
TOTAL CRA FUND		**7,532,500**	**13,209,000**	**16,270,950**	**5,400,000**	**9,100,000**	**8,100,000**
STREETS & TRAFFIC FUND (Fund 190)							
	Annual Pavement Resurfacing Program	1,500,000	1,000,000	1,000,000	1,000,000	1,000,000	1,000,000
26U29	Pedestrian & Bicycle Master Plan Projects	150,000	150,000	150,000	150,000	150,000	150,000
26U31	Annual Alleyway Improvement Project	0	300,000	TBD	TBD	TBD	TBD
	Intersection/Signal System Improvements	0	0	1,000,000	250,000	0	1,000,000
26U01	New - Intersection/Signal System Improvements	0	1,150,000	TBD	0	0	0
25C02	Street Signage - 1st Ave S, 10th St, and 12th St	0	TBD	0	0	0	0
	American Disablity Act (ADA) Infrastructure Improvement	0	0	75,000	75,000	75,000	75,000
TOTAL STREETS AND TRAFFIC FUND		**1,650,000**	**2,600,000**	**2,225,000**	**1,475,000**	**1,225,000**	**2,225,000**
GENERAL FUND (001)							
SWall	Seawall Replacements	750,000	4,500,000	0	200,000	2,300,000	180,000
TOTAL GENERAL FUND		**750,000**	**4,500,000**	**0**	**200,000**	**2,300,000**	**180,000**
SOLID WASTE FUND (Fund 450)							
26P01	Large Refuse Truck Replacements (2)	1,115,000	730,000	850,000	850,000	850,000	850,000
26P02	Rebuild Solid Waste Refuse Trucks	200,000	200,000	200,000	200,000	200,000	200,000
26P21	Satellite Collection Vehicle Replacement	55,000	130,000	65,000	65,000	65,000	65,000
26P03	Service Vehicle Replacement	45,000	55,000	0	0	0	60,000
	Roll-off Truck Replacement	0	0	300,000	0	0	0
TOTAL SOLID WASTE FUND		**1,415,000**	**1,115,000**	**1,415,000**	**1,115,000**	**1,115,000**	**1,175,000**
STORMWATER FUND (Fund 470)							
26V02	Citywide Stormwater Improvements	1,100,000	1,600,000	1,600,000	1,600,000	1,600,000	1,600,000
26V14	Basin Improvements	725,000	0	0	0	0	0
26V14	Implementation of Multi-Basin - #IV (17th Ave S)	0	1,500,000	10,000,000	0	0	0
26V14	Implementation of Multi-Basin Improvements	0	3,500,000	3,000,000	65,000,000	0	0
26V28	Stormwater Pump Station Improvements	0	200,000	1,500,000	500,000	100,000	100,000
26V27	Lake Equipment/Control/Monitoring Improvements (Weirs, Aerators, Control Panels, etc.)	0	150,000	150,000	150,000	150,000	150,000
26V01	Service Truck - New Addition (1 per year)	0	55,000	55,000	0	0	0
26V11	Annual Alleyway Improvement: Project	0	300,000	TBD	TBD	TBD	TBD
	Citywide Lake Restoration Improvements	0	0	3,400,000	400,000	5,000,000	400,000
	Streets Sweeper Replacements (1/year)	475,000	0	500,000	0	0	500,000
	Service Truck Replacement	55,000	0	0	120,000	0	0
	Television and Inspection Truck* - New Addition	0	0	0	0	0	650,000
TOTAL STORMWATER FUND		**2,355,000**	**7,305,000**	**20,205,000**	**67,770,000**	**6,850,000**	**3,400,000**
BEACH FUND (Fund 430)							
26R05	Lowdermilk Park Improvements	300,000	400,000	300,000	300,000	300,000	200,000
26R15	Beach Maintenance Cart (1)	17,000	17,500	18,000	18,000	18,000	18,000
26R16	Lowdermilk Park Cameras	0	30,000	0	0	0	0
26R12	Beach Specialist LSV	0	25,000	0	0	0	0
26R13	Beach Specialist ATV Replacement (1)	0	18,000	20,000	22,000	24,000	27,000
	Beach Specialist Vehicle	51,000	0	0	0	0	0
TOTAL BEACH FUND		**368,000**	**490,500**	**338,000**	**340,000**	**342,000**	**245,000**

Accepted 9/22/2025 2026 Annual Update is pending

CAPITAL PROJECTS - ALL FUNDS
FISCAL YEARS 2026-2030

CIP NUMBER	PROJECT DESCRIPTION	AMENDED BUDGET 2024-25	REQUEST 2025-26	2026-27	2027-28	2028-29	2029-30
CITY DOCK FUND (Fund 460)							
25Q02	Fuel Tank Replacement	0	1,000,000	0	0	0	0
25Q06	Naples Landings Improvements	0	115,000	0	0	0	0
	Office design / rebuild	0	0	100,000	0	0	0
	Replace skiff	0	0	0	100,000	0	0
TOTAL NAPLES CITY DOCK FUND		**0**	**1,115,000**	**100,000**	**100,000**	**0**	**0**
TENNIS FUND (Fund 480)							
26G01	Tennis Center Improvements - court leveling/relining	75,000	80,000	100,000	100,000	100,000	100,000
TOTAL TENNIS FUND		**75,000**	**80,000**	**100,000**	**100,000**	**100,000**	**100,000**
BAKER PARK FUND (Fund 125)							
	Baker Park Improvements	950,000	0	0	0	0	0
TOTAL BAKER PARK FUND		**950,000**	**0**	**0**	**0**	**0**	**0**
TECHNOLOGY FUND (Fund 520)							
26T05	Supplemental Data Center Cooling	120,000	25,000	0	0	0	80,000
26T07	WI-FI Hardware Refresh	45,000	95,000	100,000	0	0	0
26T06	Network Switch Refresh	20,000	50,000	100,000	55,000	55,000	55,000
26T08	Security Camera Refresh	100,000	150,000	160,000	170,000	170,000	180,000
26T16	Fiber Optic Ring	0	350,000	200,000	125,000	50,000	50,000
26T10	Network Access Contro (NAC)	100,000	22,000	0	0	0	0
26T09	MSP Crossover	0	30,000	20,000	0	0	0
26T11	MDF Security	0	30,000	75,000	75,000	0	0
26T04	Monitor Refresh	0	43,000	0	0	0	0
	Storage Area Network Refresh	0	0	0	0	0	225,000
	Backup & Recovery	0	0	130,000	0	0	0
	UPS Refresh (FY28 = desktop)	0	0	0	60,000	45,000	50,000
	PC/Laptop Replacement Program	50,000	0	0	0	300,000	300,000
	Security Camera Storage Refresh	100,000	0	0	0	100,000	0
	Hyper-V Virtual Host Servers Refresh	115,000	0	0	0	250,000	250,000
	Internet Redundancy (BCP)	50,000	0	0	0	0	0
	Department Vehicle	30,000	0	50,000	0	0	0
	Firewall Refresh	0	0	0	0	0	220,000
	Phone System Upgrade	0	0	0	300,000	0	0
	Emergency Call Boxes	0	0	40,000	10,000	10,000	10,000
TOTAL TECHNOLOGY SERVICES FUND		**730,000**	**795,000**	**875,000**	**795,000**	**980,000**	**1,420,000**
EQUIPMENT SERVICES (Fund 530)							
26S12	Forklift Replacement	0	70,000	0	0	0	0
26S03	Vehicle Lifts	0	30,000	0	40,000	0	40,000
	Facility Improvements	1,500,000	0	350,000	0	0	0
	Service Truck Replacement	0	0	0	65,000	0	0
TOTAL EQUIPMENT SERVICES FUND		**1,500,000**	**100,000**	**350,000**	**105,000**	**0**	**40,000**
ONE CENT SALES TAX (Fund 350)							
22Z07	Fire Station No. 2 Bay Hardening/Renovations	22,529	0	0	0	0	0
19Z02	ADA and Mobility Improvements to City Buildings	424,185	0	0	0	0	0
20Z06	Government Buildings Hardening Program	279,573	0	0	0	0	0
22Z21	ADA Infrastructure Improvements	356,705	0	0	0	0	0
25Z09	Intersection/Signal System Improvements	2,000,000	0	0	0	0	0
21V25	Beach Outfall Removal & Water Quality	11,559,930	0	0	0	0	0
20Z08	Camera Infrastructure/Fiber Optics	104,368	0	0	0	0	0
TOTAL ONE CENT SALES TAX		**14,747,290**	**0**	**0**	**0**	**0**	**0**
	TOTAL ALL CAPITAL PROJECTS	51,331,311	59,100,419	149,327,319	114,070,847	39,966,847	38,782,879

DRAFT Adopted 9/22/2025 Annual Update is pending

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IMPROVEMENTS PROGRAM
PUBLIC SERVICE TAX / CAPITAL IMPROVEMENT FUND

The Public Service Tax/Capital Improvement Fund is one of the largest sources of capital financing for the City of Naples. There are four areas typically funded by the Public Service Tax Fund; Administrative Departments, Police Department, Fire-Rescue Department and Community Services Department.

Florida Statute sections 166 and 202 authorize municipalities to collect Public Service Taxes. City Code Section 34 Article IV governs the collection and appropriation of Naples' public service tax receipts. City Code states that public service tax receipts shall first be appropriated for any debt service on outstanding obligations backed by these receipts. After that, funds are to be transferred to the capital improvement fund of the City for the uses and purposes set forth and contained in the budget for the current fiscal year. This fund represents the latter purpose.

Additional Revenue Sources
As a revenue source, Impact Fees are tracked in separate funds, which are not budgeted until the funds are needed. In accordance with state law Impact Fees may only be used to provide increased capacity for the fire, police, and parks and recreation operations to accommodate any increased demand new development will have on existing operations. For FY 2025-26, the use of impact fees is not proposed, but are recommended to be reserved for expanded capacity projects in the future.

The April 2025 balances of the Impact Fee Funds are as follows:

Fire (Fund 312)	$ 1,048,464
Police (Fund 311)	$ 408,468
Recreation (Fund 314)	$ 687,942

There are several other unbudgeted funds which can be used for capital improvements specific to each funds authorized purpose. The current balances are:

Public Art Fund (Fund 140)	$ 2,096,694
Parking Trust Fund (Fund 185)	$ 569,248
Land Trust Fund (Fund 320)	$ 9,209
41-10 Public Open Space Fund (Fund 181)	$ 1,416,774

Summary
The FY 2026-30 Capital Improvement Program of the Public Service Tax Fund is outlined on the following pages. Projects tentatively planned for FY 2025-26 total $9.03 million and are displayed with data sheets that provide details of the project, the justification for the project, and related information. Projects for Fiscal Years 2026-27 and beyond do not include capital project sheets in this document.

Adopted 9/2/2025
2026 Annual Update is pending

PUBLIC SERVICE TAX FUNDS
FINANCIAL ESTIMATES FOR CAPITAL PROJECTS
Fiscal Years 2026-2030

	Budget 2024-25	Projected 2025-26	2026-27	2027-28	2028-29	2029-30
9/30 Fund Balance	**23,555,520**	**6,173,827**	**3,068,797**	**(507,800)**	**(5,293,281)**	**(10,891,680)**
For both Debt and Capital Project Funds						
Estimated Revenues						
Electric Public Service Tax	3,600,000	3,600,000	3,850,000	3,900,000	3,950,000	4,000,000
Natural Gas Tax	65,000	70,000	75,000	80,000	85,000	90,000
Propane Gas Tax	230,000	230,000	235,000	235,000	240,000	245,000
Local Telecommunications Tax	870,530	870,530	950,000	950,000	950,000	950,000
Auction/Assessments/Interest	212,910	1,482,191	210,000	190,000	185,000	175,000
Transfers In - CRA/Beach Fund	2,655,585	2,653,250	2,652,750	2,653,000	2,653,750	2,654,750
Bond Proceeds (1)	0	0	29,000,000	0	0	0
Total Revenues	**7,634,025**	**9,105,971**	**36,972,750**	**8,008,000**	**8,063,750**	**8,114,750**
Estimated Expenditures						
Public Service Tax 2018 Debt	387,204	387,503	387,504	387,503	0	0
Public Service Tax FS#2 Debt	0	0	0	1,950,000	1,950,000	1,950,000
Transfers to Other Funds (2)	15,409,351	0	0	0	0	0
Debt Service - CRA	1,385,419	1,384,201	1,383,940	1,384,071	1,384,461	1,384,983
Debt Service - Pier	1,270,167	1,269,049	1,268,811	1,268,930	1,269,289	1,269,767
Administration	137,950	139,330	140,723	142,130	143,551	144,987
Total Expenditures	**18,590,091**	**3,180,083**	**3,180,978**	**5,132,634**	**4,747,301**	**4,749,737**
Net Income before Capital	(10,956,066)	5,925,889	33,791,772	2,875,366	3,316,449	3,365,013
Available for Capital Projects	12,599,454	12,099,716	36,860,569	2,367,566	(1,976,833)	(7,526,666)
CIP Requests (from List)	**5,023,521**	**9,030,919**	**37,368,369**	**7,660,847**	**8,914,847**	**5,743,879**
Prior Year Rollovers	**1,402,106**					

(1) Fire Station #2 construction
(2) Debt proceeds owed to the Beach Fund - Pier ($11,000,000) & CRA Fund - Garage ($4,409,351)

Adopted 9/22/2025
2026 Annual Update is pending

CAPITAL PROJECTS - PUBLIC SERVICE TAX FUND
FISCAL YEARS 2026-30

CIP NUMBER	PROJECT DESCRIPTION	AMENDED BUDGET 2024-25	REQUEST 2025-26	2026-27	2027-28	2028-29	2029-30
POLICE DEPARTMENT							
26H12	Axon Equipment (Tasers, Body Worn Cameras)	273,814	304,421	304,421	304,421	304,421	304,421
26H13	In Car Camera Replacements	76,164	76,164	76,164	76,164	76,164	76,164
26H01	Marked Vehicle Replacement (4)	92,000	300,000	540,750	318,270	273,682	253,250
26H03	Unmarked Police Vehicle Replacement (1)	100,000	63,000	226,600	291,748	240,400	123,810
26H24	Marked Vehicles - New (6)	0	468,000	600,600	660,360	726,726	0
26H08	Unmarked Vehicles - New (2)	150,000	126,100	0	58,360	0	0
26H09	Mobile Data/Laptop Computer Replacements (7)	156,243	70,000	0	0	0	0
26H20	LPR Camera Replacements/Upgrade	119,000	235,000	200,000	200,000	200,000	200,000
26H10	Axon Drone Sense	0	13,256	13,256	13,256	13,256	13,256
26H17	Axon Virtual Reality Training Equipment & Software	0	34,978	22,978	22,978	22,978	22,978
26H05	AED Replacements & Accessories	64,712	10,000	10,000	10,000	10,000	30,000
26H11	Communications Furniture/Desk Motors	19,081	60,000	0	0	0	0
26H07	Swat Night Vision Equipment (2)	0	40,000	40,000	0	0	0
	Motorcycle Replacement (2)	0	0	100,000	0	0	0
	Marine Outboard Motor Replacement (2)	0	0	55,000	0	0	0
	CSI Photography Equipment Replacement	0	0	10,000	0	0	0
	Ballistic Helmet Replacement (34)	0	0	13,600	0	0	0
	Facility Lighting Replacement	0	0	0	10,000	0	0
	Enclosed Trailer	0	0	0	20,000	0	0
	Marine Vessel Replacement (1)	0	0	0	240,000	0	0
	Tactical Body Armor & Helmet Replacement (6)	10,288	0	0	30,000	0	0
	Drone - SUAS Replacements and Accessories (2)	82,000	0	0	0	99,220	0
	Bathroom, Stairwell, Locker Room Renovations	0	0	0	0	500,000	0
	Building Wind and Flood Mitigation	0	0	0	0	0	450,000
	Police Specialty Vehicle (Swat)	0	0	0	0	0	300,000
	Portable Radio Replacement & Services	450,000	0	0	0	0	270,000
	Mobile Radio Replacement	20,000	0	0	0	0	0
	Secure Digital Storage (RAID)	30,000	0	0	0	0	0
	SIU Tech & Surveilance Equipment	25,000	0	0	0	0	0
	Police Building Master Re Key / Security	15,000	0	0	0	0	0
	COP Furniture Replacement	29,419	0	0	0	0	0
	Parking Lot Lighting Enhancements	15,000	0	0	0	0	0
TOTAL POLICE DEPARTMENT		**1,727,521**	**1,800,919**	**2,213,369**	**2,255,847**	**2,486,847**	**2,043,879**
FIRE AND RESCUE DEPARTMENT							
26E02	Engine	0	1,000,000	0	0	0	0
26E01	Staff vehicles - Renamed CH01 to Bat 5 and FM (2)	0	200,000	0	0	0	0
26E13	Therma Imagers	15,000	100,000	0	0	0	0
26E04	Retro fit apparatus with narc locks	0	40,000	0	0	0	0
26E05	Technical Rescue Equipment	0	65,000	65,000	0	0	0
26E09	Emergency Services Marine Dock	0	100,000	500,000	0	0	0
25E22	New Fire Station #2	1,200,000	1,000,000	29,000,000	0	0	0
	Public Safety Training Facility	0	0	800,000	0	0	0
	Bunker Gear Replacement	0	0	90,000	100,000	120,000	0
	Engine Co. 1 - Fully Equipped (Repl.)	0	0	1,100,000	0	0	0
	Ladder One fully equipped replacement	0	0	0	1,500,000	0	0
	Zoll heart monitors	0	0	0	500,000	0	0
	Engine Co. 2 - Fully Equipped (Repl)	0	0	0	0	1,500,000	0
	Fire boat 15yr replacement	0	0	0	0	1,000,000	0
	K-Saws / Chainsaws	0	0	0	0	28,000	0
	Battalion 1 (fully outfitted)	0	0	0	0	175,000	0
	Assistant Fire Marshal Vehicle (new)	80,000	0	0	0	0	0
	SCBA Masks and Regulators	120,000	0	0	0	0	0
	Portable Radios	195,000	0	0	0	0	0
	Station One Renovation	0	0	0	0	0	250,000
	HVAC renovation at FS1	0	0	0	0	0	250,000
	Ocean rescue equipment	0	0	0	0	0	150,000
	Bat 6 and 7, Chief 3 (min equip needed)	0	0	0	0	0	350,000
	Squad replacement & equipment	0	0	0	0	0	1,000,000
TOTAL FIRE RESCUE		**1,611,000**	**2,505,000**	**31,555,000**	**2,100,000**	**2,823,000**	**2,000,000**

2026 Annual Update is pending
Adopted 9/22/2025

CAPITAL PROJECTS - PUBLIC SERVICE TAX FUND
FISCAL YEARS 2026-30

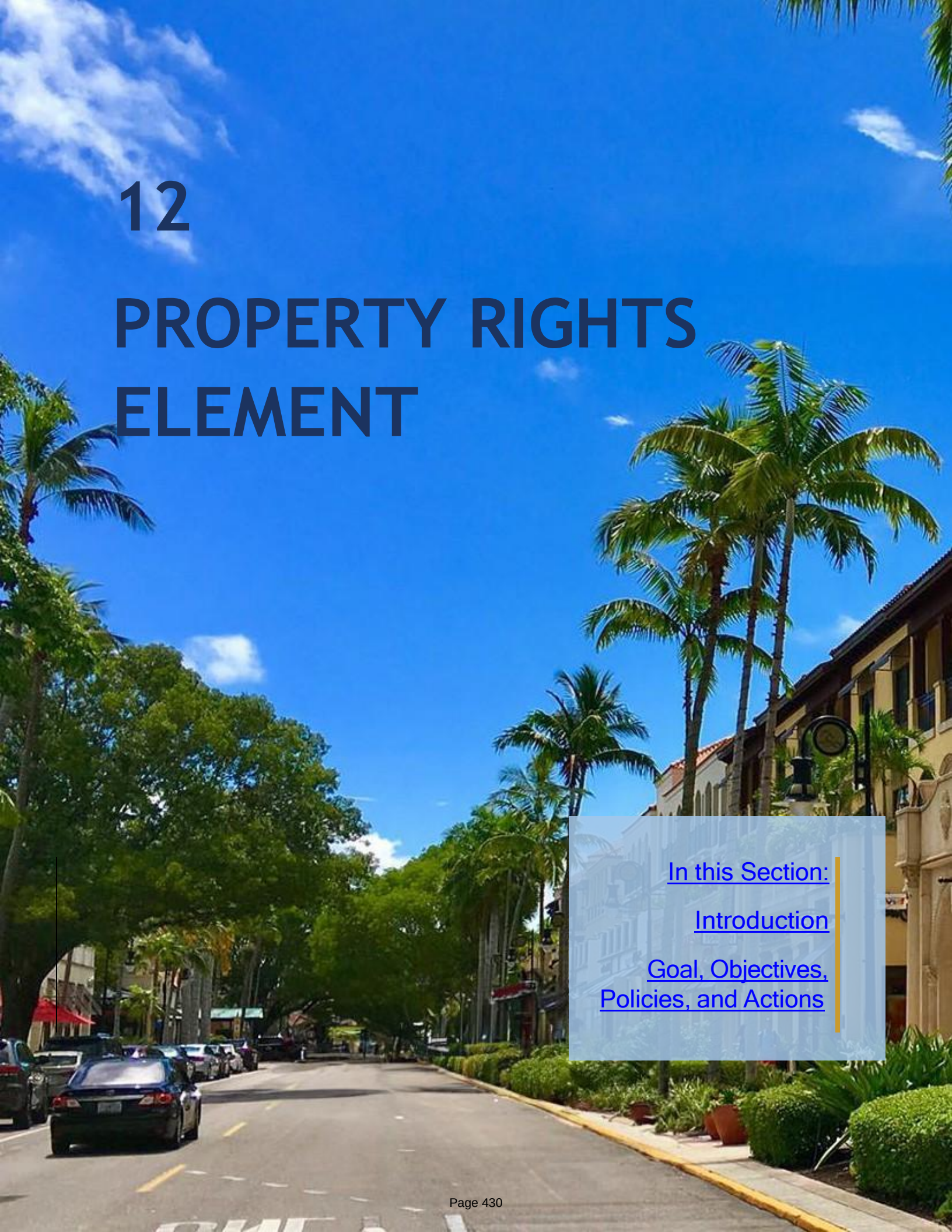
CIP NUMBER	PROJECT DESCRIPTION	AMENDED BUDGET 2024-25	REQUEST 2025-26	2026-27	2027-28	2028-29	2029-30
PARKS, RECREATION AND FACILITIES DEPARTMENT							
Landscaping/Parks & Parkways Continuing and New Projects							
26F03	Tree Fill In and Replacement Program	250,000	300,000	300,000	300,000	300,000	300,000
26F32	Landscape Median Restoration	450,000	500,000	550,000	550,000	600,000	600,000
26F02	Small Equipment Replacement - Pk/Pkwys	35,000	85,000	50,000	50,000	50,000	50,000
26F07	Upgrade to Irrigation System - US 41 Medians	0	50,000	20,000	20,000	10,000	10,000
	Vehicle Replacement - Pk/Pkwys	65,000	0	65,000	65,000	65,000	65,000
	Urban Forest Tree Inventory Update	50,000	0	0	0	0	250,000
Recreation Facilities Continuing and New Projects							
26C03	River Park Aquatic Center - Improvements	0	150,000	50,000	50,000	50,000	0
26G23	Skate Park Improvements	0	100,000	0	0	400,000	0
26G11	Fleischmann Park Improvements	250,000	300,000	1,000,000	500,000	1,800,000	200,000
26G21	Recreation Vehicle Purchase (1 SUV)	35,000	45,000	0	0	0	0
26G02	Baker Park Improvements	0	75,000	150,000	1,000,000	0	0
26G26	Seagate Park - Tennis Court/Racquetball Resurface	0	50,000	0	0	0	0
26G04	Cambier Park Improvements	100,000	2,000,000	0	500,000	200,000	0
26G02	River Park Community Center & Park Improvements	0	760,000	100,000	100,000	25,000	0
	Norris Center Improvements	150,000	0	250,000	100,000	50,000	0
	Anthony Park Improvements	0	0	25,000	25,000	25,000	25,000
	Department Master Plan Update	200,000	0	0	0	0	200,000
	Naples Preserve Improvements	0	0	50,000	0	50,000	0
	Van Replacement (1) - Recreation (Norris)	0	0	30,000	0	0	0
City Facilities Continuing and New Projects							
26I05	Replacement Vehicle - Facilities Maintenance	0	60,000	60,000	45,000	0	0
26I01	HVAC Controls Upgrade - City Hall and NPD	0	250,000	0	0	0	0
	Elevator Modernizations	0	0	0	0	0	0
	New Parks, Recreation, and Facilities Building	0	0	800,000	0	0	0
TOTAL PARKS, RECREATION AND FACILITIES DEPT		**1,685,000**	**4,725,000**	**3,600,000**	**3,305,000**	**3,625,000**	**1,700,000**
TOTAL PUBLIC SERVICE TAX		**5,023,521**	**9,030,919**	**37,368,389**	**7,660,847**	**8,914,847**	**5,743,879**

Adopted 9/22/2025
2026 Annual Update is pending

CAPITAL IMPROVEMENT PROJECTS
POLICE DEPARTMENT - PUBLIC SERVICE TAX FUND

CIP NUMBER	PROJECT DESCRIPTION	Budget 2024-25	Request 2025-26	2026-27	2027-28	2028-29	2029-30
26H12	Axon Equipment (Tasers, Body Worn Cameras)	273,614	304,421	304,421	304,421	304,421	304,421
26H13	In Car Camera Replacements	76,164	76,164	76,164	76,164	76,164	76,164
26H01	Marked Vehicle Replacement (4)	92,000	300,000	540,750	318,270	273,682	253,250
26H03	Unmarked Police Vehicle Replacement (1)	100,000	63,000	226,800	291,748	240,400	23,810
26H24	Marked Vehicles - New (6)	0	468,000	600,600	660,660	726,726	0
26H08	Unmarked Vehicles - New (2)	150,000	126,100	0	58,350	0	0
26H09	Mobile Data/Laptop Computer Replacements (7)	158,243	70,000	0	0	0	0
26H20	LPR Camera Replacements/Upgrade	119,000	235,000	200,000	200,000	200,000	200,000
26H10	Axon Drone Sense	0	13,256	13,256	13,256	13,256	13,256
26H17	Axon Virtual Reality Training Equipment & Software	0	34,978	22,978	22,978	22,978	22,978
26I 05	AED Replacements & Accessories	64,712	10,000	10,000	10,000	10,000	30,000
26H11	Communications Furniture/Desk Motors	19,081	60,000	0	0	0	0
26H07	Swat Night Vision Equipment (2)	0	40,000	40,000	0	0	0
	Motorcycle Replacement (2)	0	0	100,000	0	0	0
	Marine Outboard Motor Replacement (2)	0	0	55,000	0	0	0
	CSI Photography Equipment Replacement	0	0	10,000	0	0	0
	Ballistic Helmet Replacement (34)	0	0	13,600	0	0	0
	Facility Lighting Replacement	0	0	0	10,000	0	0
	Enclosed Trailer	0	0	0	20,000	0	0
	Marine Vessel Replacement (1)	0	0	0	240,000	0	0
	Tactical Body Armor & Helmet Replacement (6)	10,288	0	0	30,000	0	0
	Drone - SUAS Replacements and Accessories (2)	82,000	0	0	0	99,220	0
	Bathroom, Stairwell, Locker Room Renovations	0	0	0	0	500,000	0
	Building Wind and Flood Mitigation	0	0	0	0	0	450,000
	Police Specialty Vehicle (Swat)	0	0	0	0	0	300,000
	Portable Radio Replacement & Services	450,000	0	0	0	0	270,000
	Mobile Radio Replacement	20,000	0	0	0	0	0
	Secure Digital Storage (RAID)	30,000	0	0	0	0	0
	SIU Tech & Surveilance Equipment	25,000	0	0	0	0	0
	Police Building Master Re-Key / Security	15,000	0	0	0	0	0
	COP Furniture Replacement	29,419	0	0	0	0	0
	Parking Lot Lighting Enhancements	15,000	0	0	0	0	0
TOTAL POLICE DEPARTMENT		1,727,521	1,800,919	2,213,369	2,255,847	2,466,847	2,043,879

2026 Annual Update Adopted 9/22/2025



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PROPERTY RIGHTS ELEMENT

In this Section:

Introduction

Goal, Objectives, Policies, and Actions

INTRODUCTION

~~The purpose of this Property Rights Element is to meet and implement the statutory requirements of House Bill 59 signed by the Governor on June 28, 2021. Florida Statutes (F.S.) § 163.3177(i) requires local government comprehensive plans to contain a Property Rights Element, which identifies property rights that shall be considered during the local decision-making process.~~ This Property Rights Element is adopted in accordance with Florida Statutes Chapter 163 Part II (Community Planning Act), which requires each local government to include a property rights element in its comprehensive plan. The purpose of this Element is to ensure that judicially acknowledged and constitutionally protected private property rights are respected and considered in local government decision-making.

This Element recognizes the importance of private property rights in Florida and affirms that property owners have certain fundamental rights, including the right to possess and control their property, use and develop property consistent with applicable laws, protect their privacy, and dispose of property through sale or transfer. The Property Rights Element provides guidance to ensure that these rights are considered when the local government evaluates land use decisions, development regulations, and other planning actions.

The following Property Rights provisions shall be considered by the City when making decisions.



GOALS, OBJECTIVES, AND POLICIES, AND ACTIONS

GOAL

For the City of Naples to respect judicially acknowledged and constitutionally protected private property rights and with respect for people's rights to participate in decisions that affect their lives and property.

Objective PR-1 Acknowledgement of Property Rights

The City of Naples shall respect judicially- acknowledged and constitutionally-protected private property rights and consider these property rights during local decision-making processes.

Policy PR-1.1 General Rights of Property Owner(s)

The right of a property owner(s) to physically possess and control their interest in the property, including easements, leases, or mineral rights.

Policy PR-1.2 Rights to Use and Improve Property

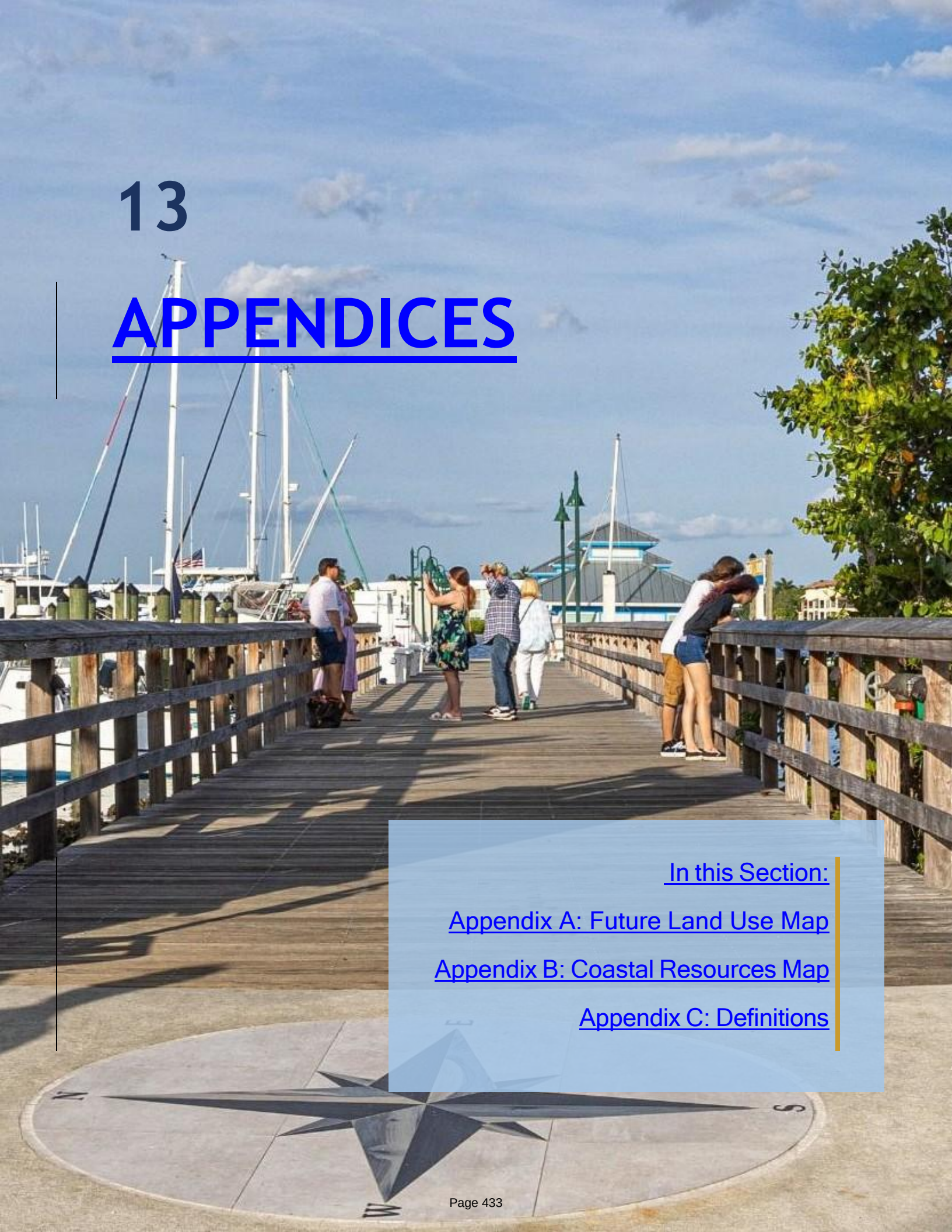
The right of a property owner(s) to use, maintain, develop, and improve their property for personal use or for the use of any other person, subject to state law,- the provisions of the City Comprehensive Plan, and local ordinances.

Policy PR-1.3 Privacy Rights

The right of the property owner to privacy and to exclude others from the property to protect the owner's possessions and property.

Policy PR-1.4 Rights to Dispose Property

The right of a property owner(s) to dispose of their property through sale, bequest, or gift.



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APPENDICES

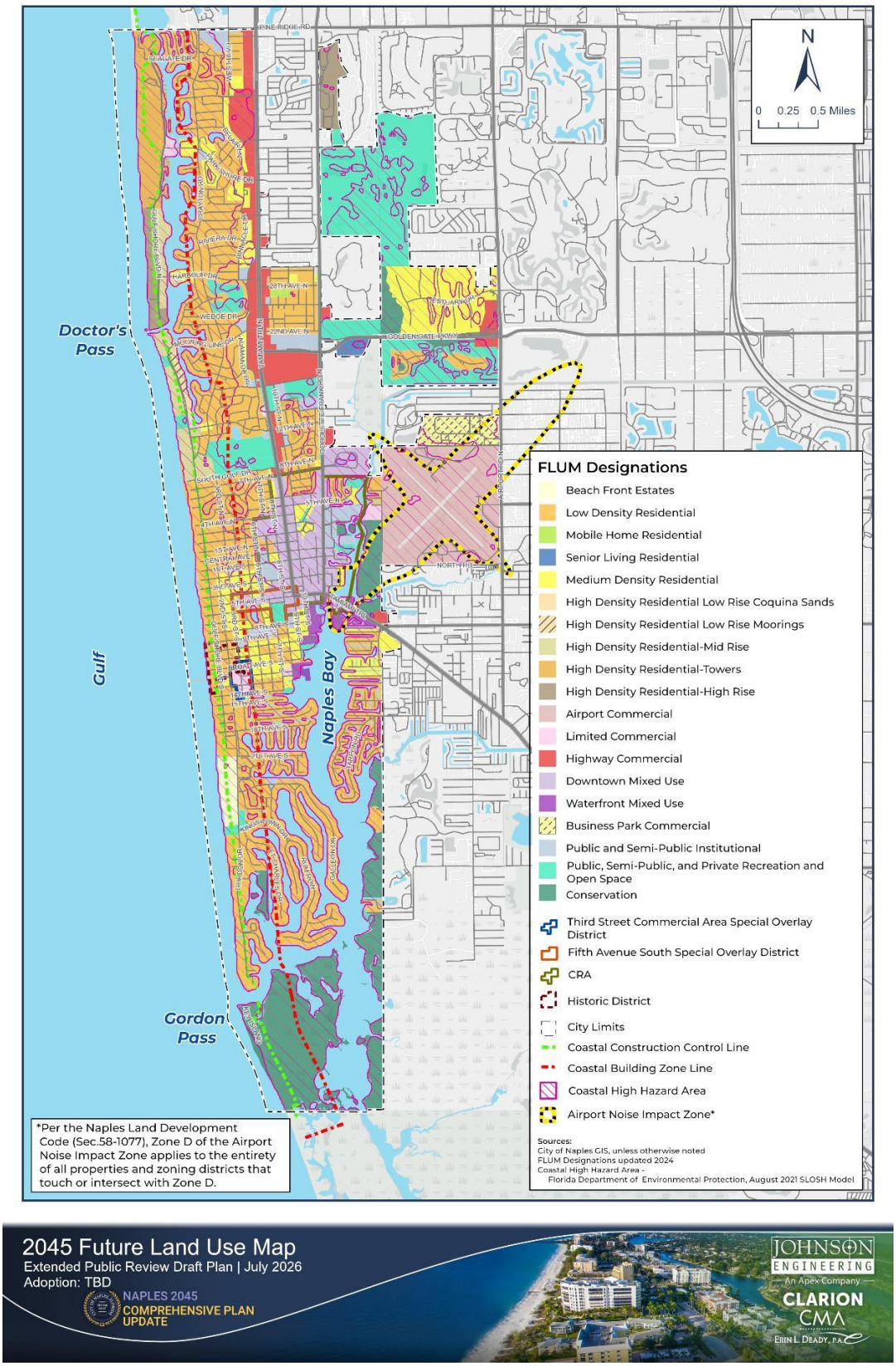
In this Section:

Appendix A: Future Land Use Map

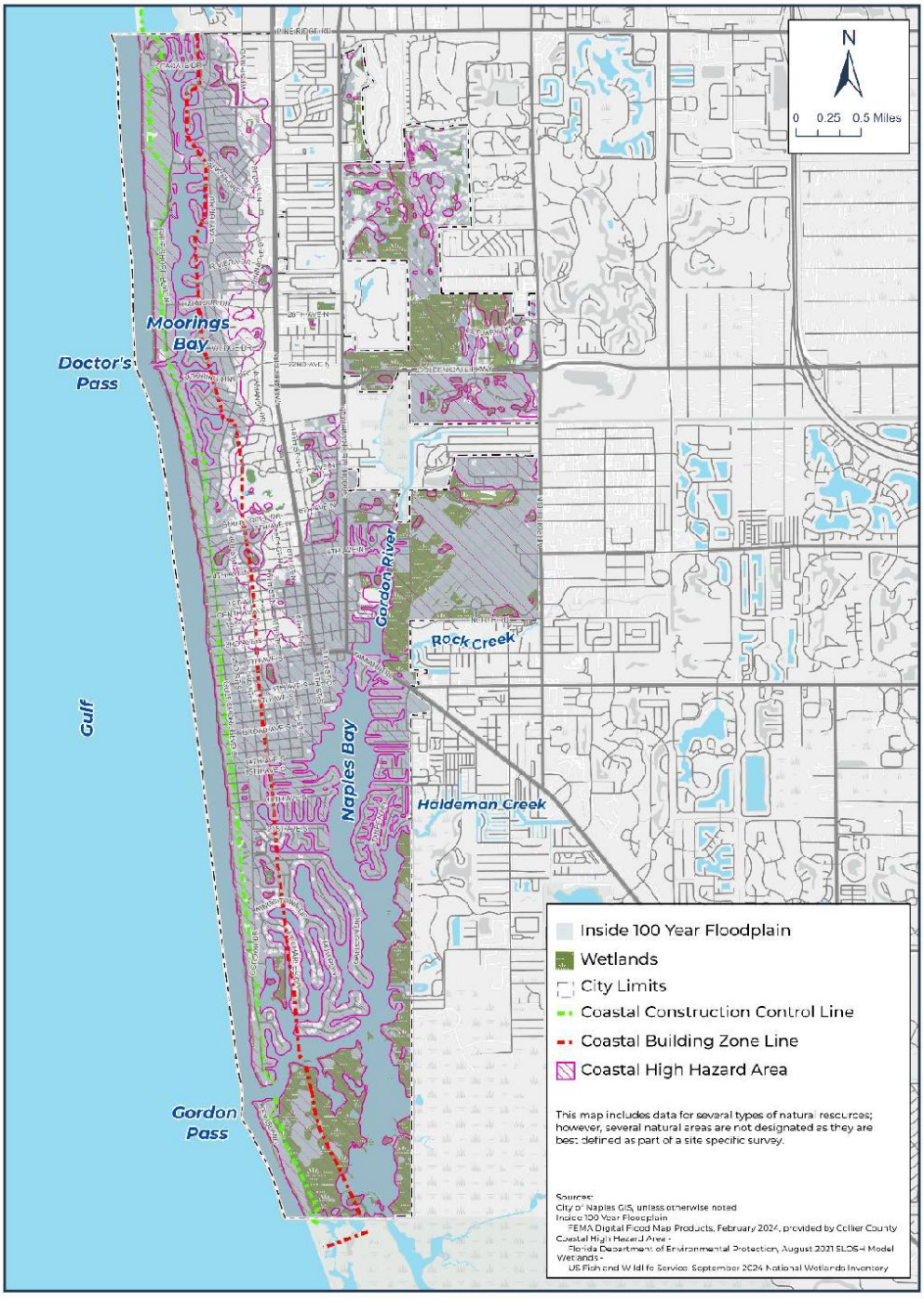
Appendix B: Coastal Resources Map

Appendix C: Definitions

APPENDIX A: FUTURE LAND USE MAP

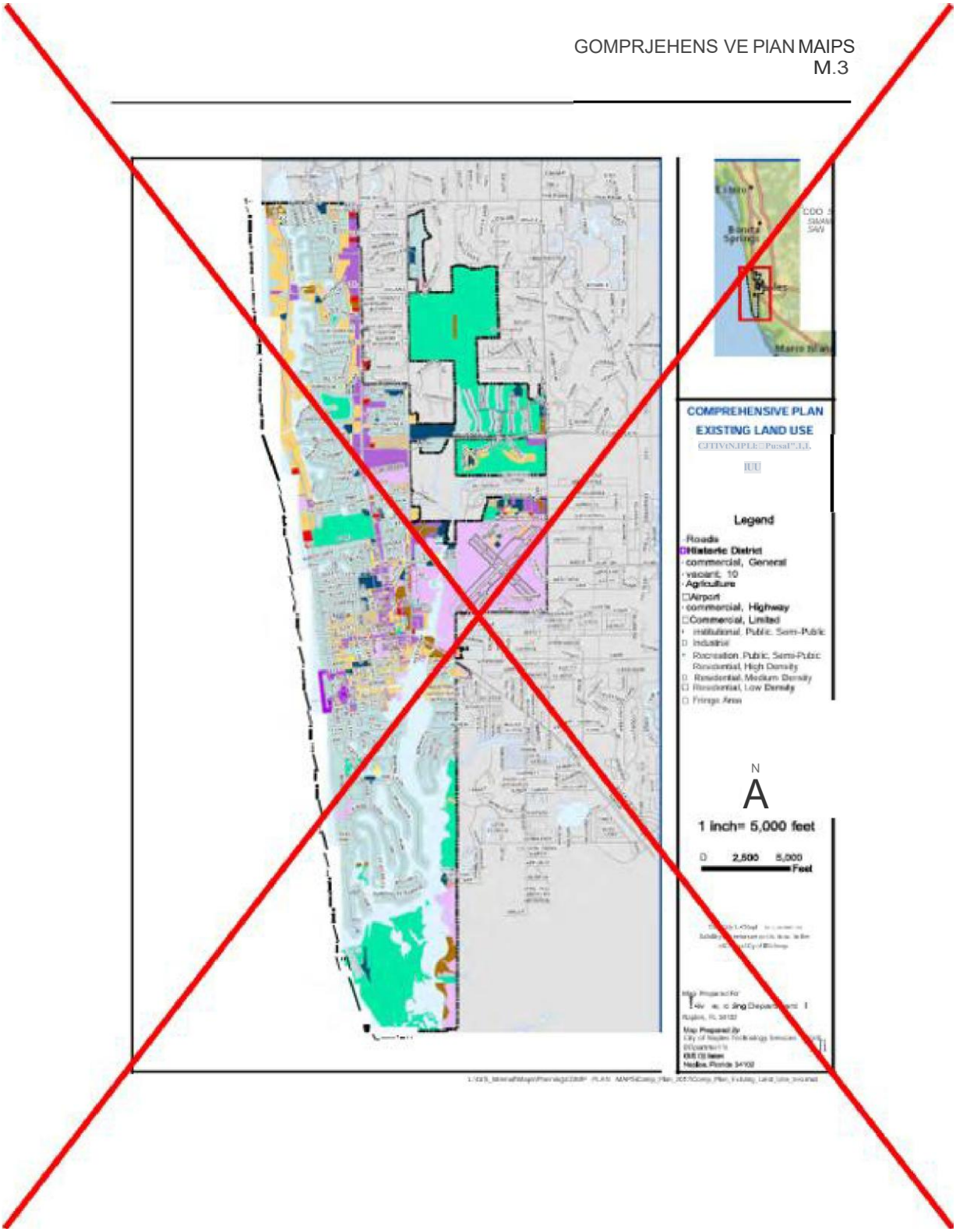


APPENDIX B: COASTAL RESOURCES MAP





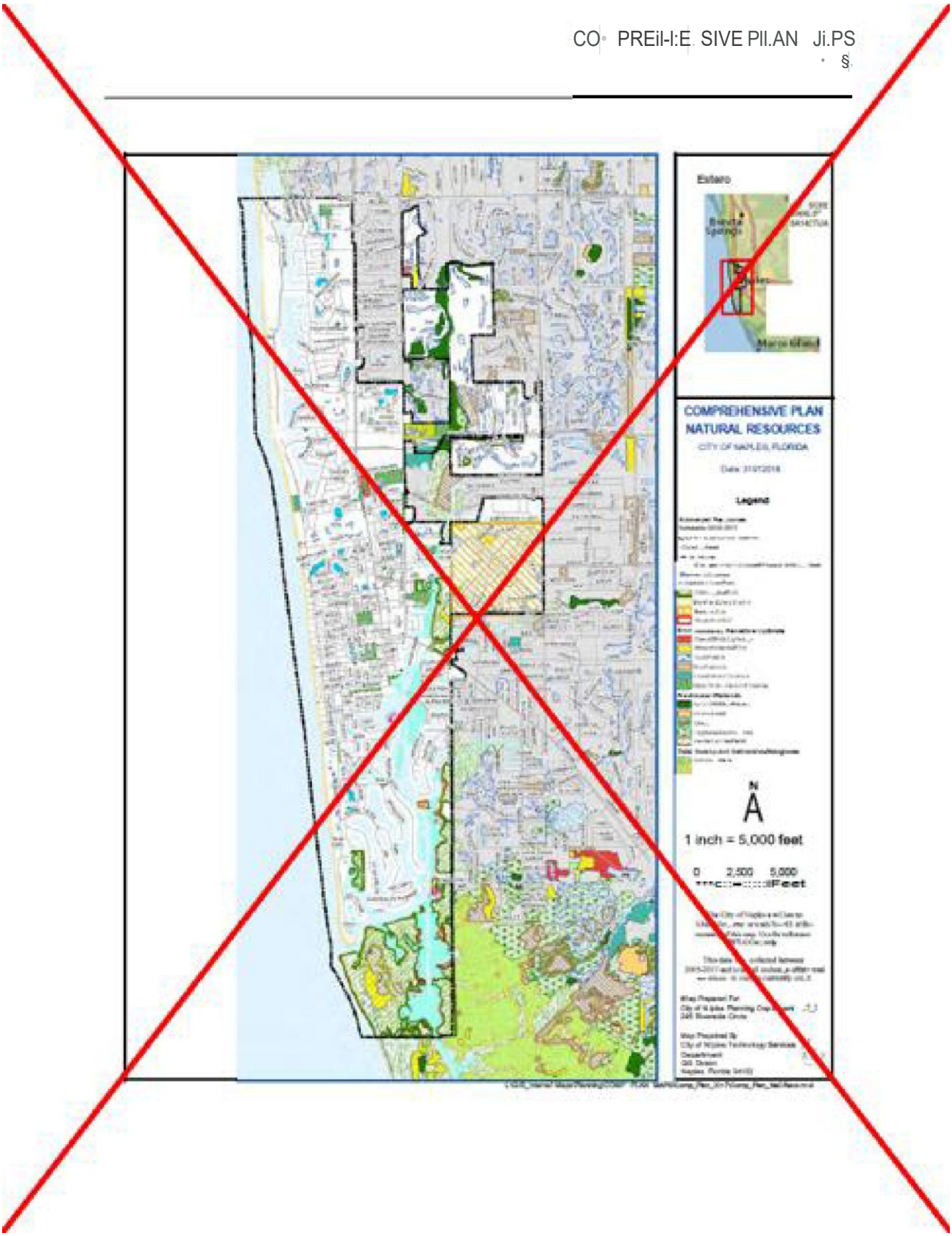
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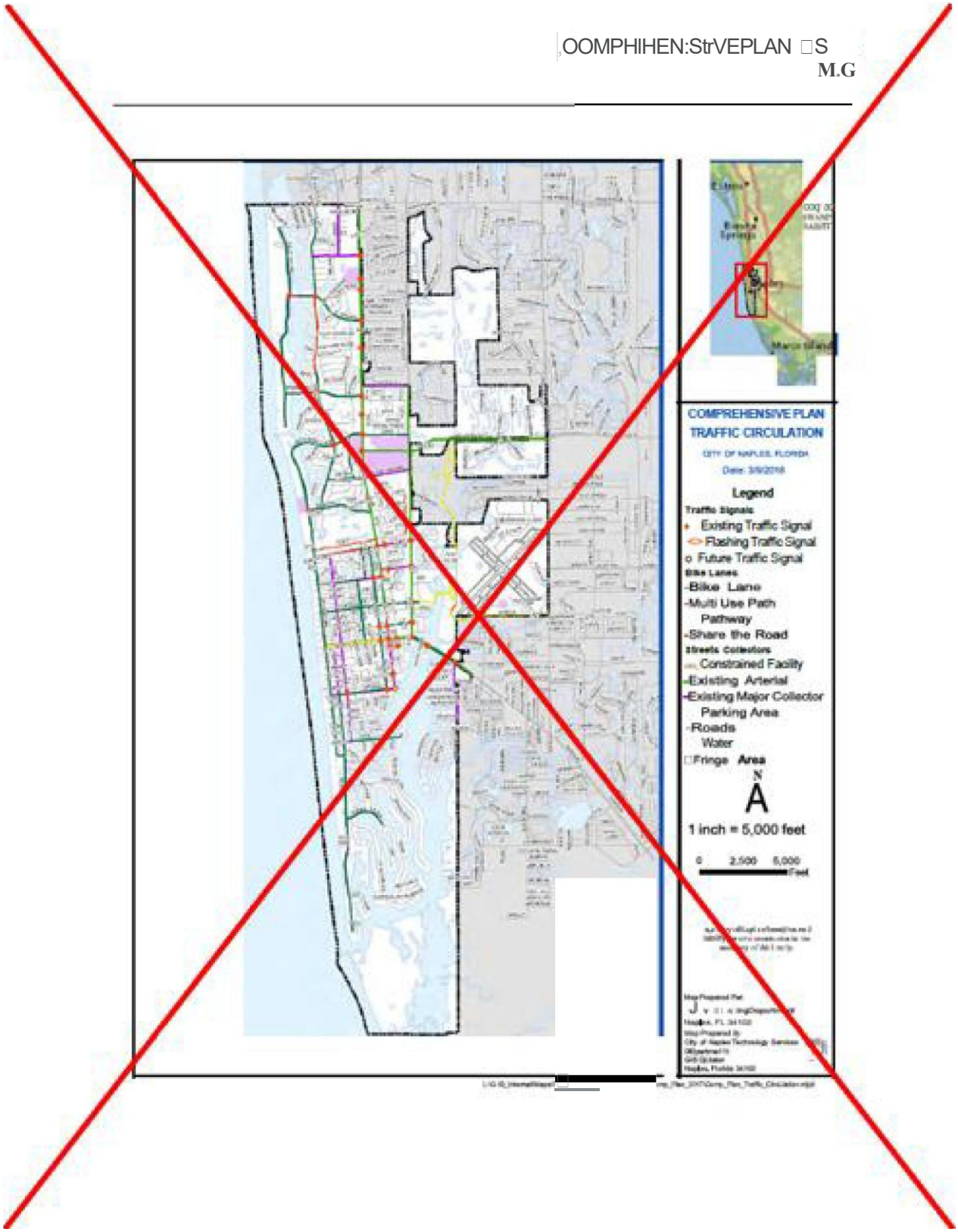
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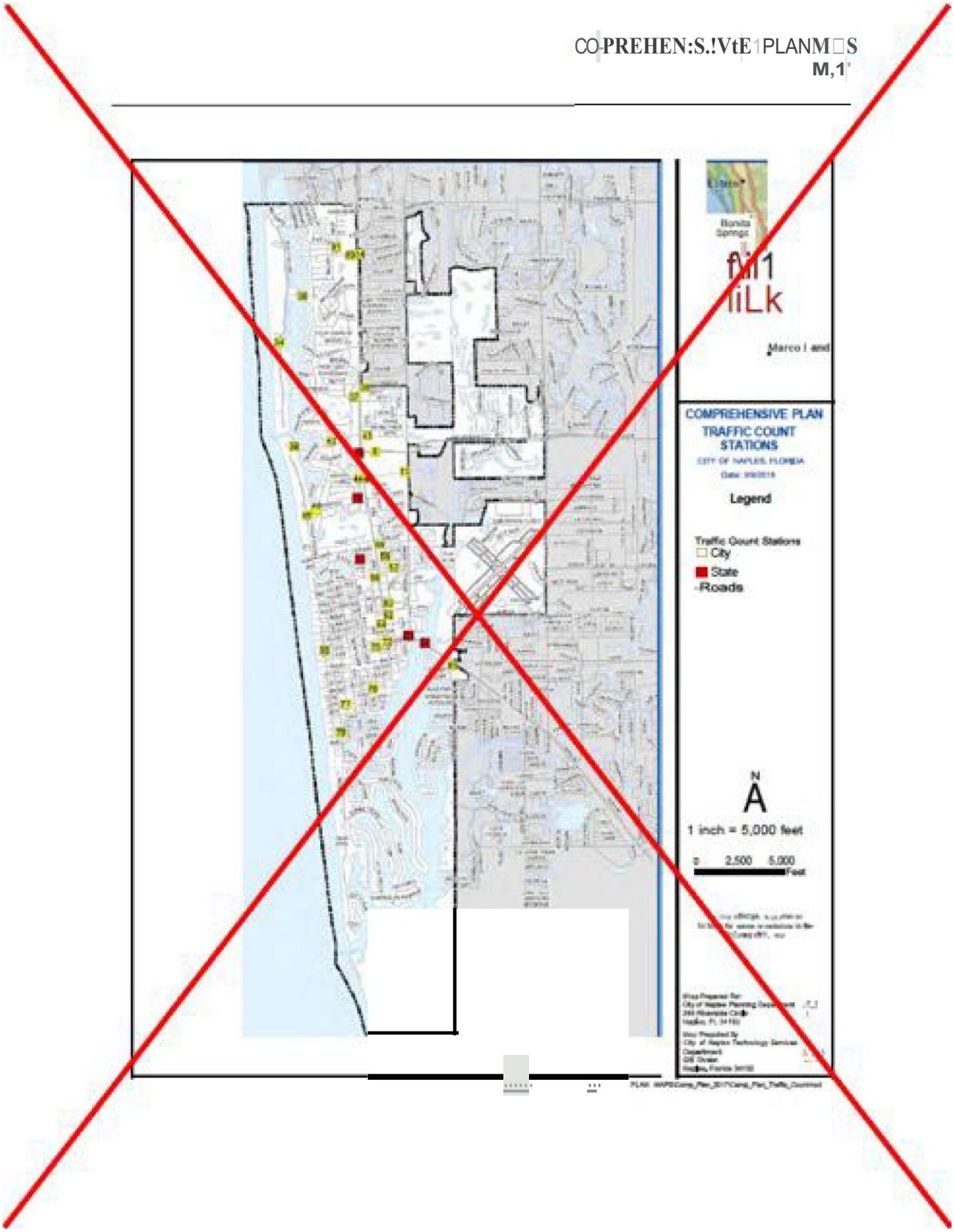


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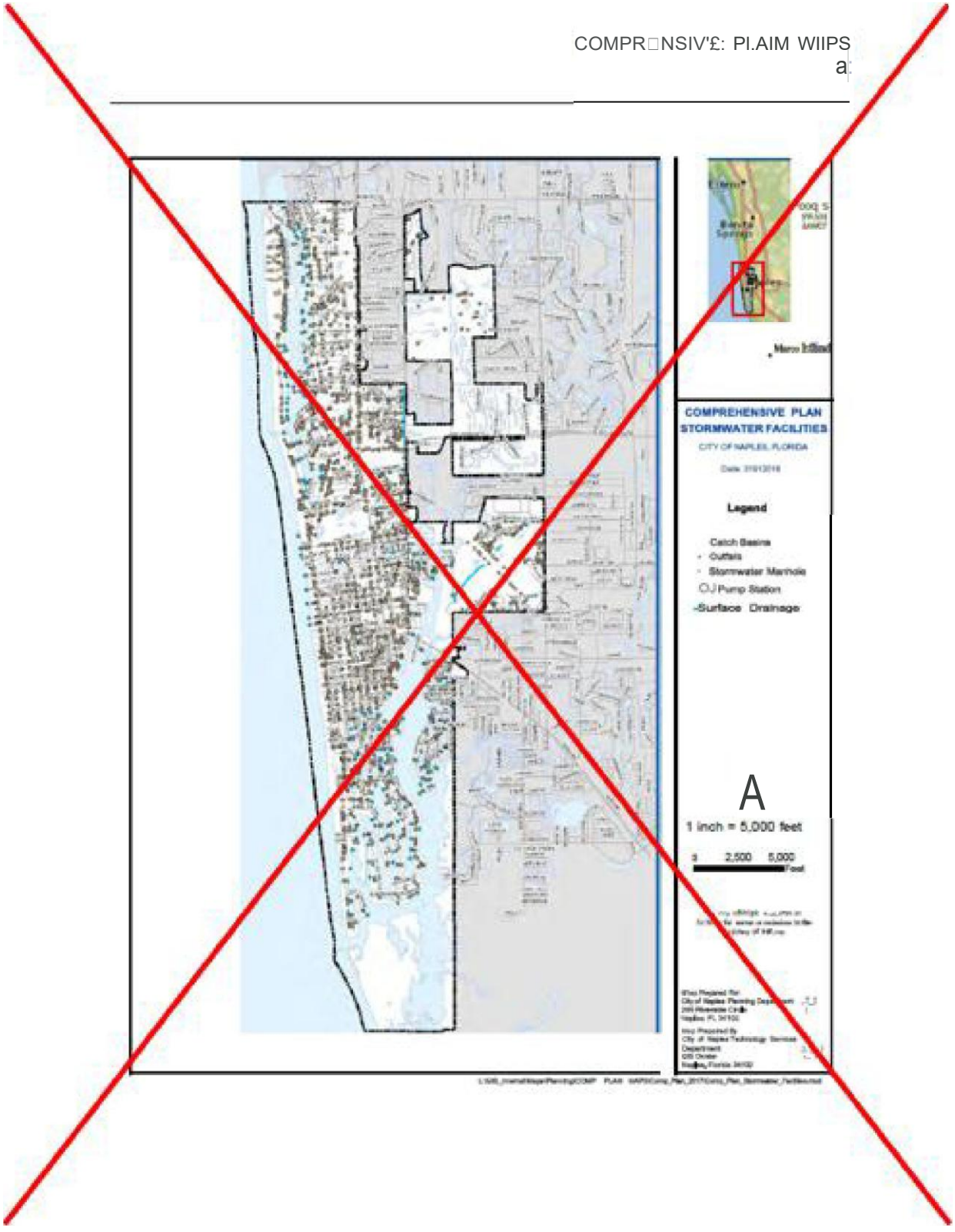


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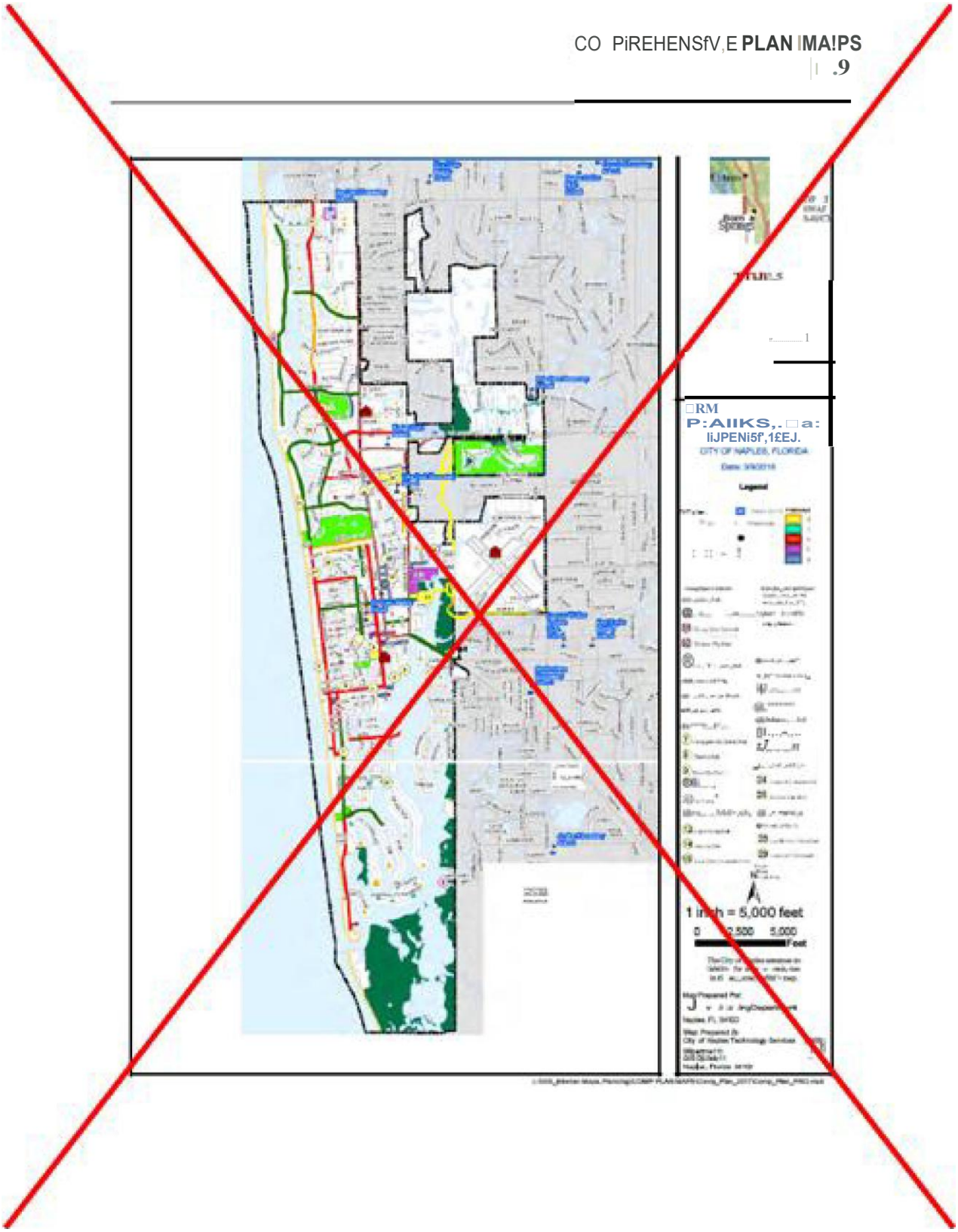



COMPREHENSIVE PLAN
TRAFFIC COUNT STATIONS
Legend
Traffic Count Stations
City
State
Roads
N
1 inch = 5,000 feet
0 2,500 5,000
Feet

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APPENDIX C: DEFINITIONS

Accretion: Slow addition of sand to beach which increases beach size; opposite of erosion.

Actions: actionable strategies that involve performing a task or producing a deliverable.

Adaptation: The process of making adjustments in natural or human systems to minimize negative impacts and capitalize on opportunities associated with change, thereby enhancing resilience and reducing vulnerability to climate-related hazards.

Affordable housing: housing which is available for citizens with income which does not exceed 65 percent of the adjusted family median income standards for the metropolitan area as defined by the U.S. Department of Housing and Urban Development. These figures shall be made available by the city manager. At least 40 percent of housing units built under the development standards listed in this section must be available to low-income citizens with incomes below 65 percent of the adjusted family median income. In addition, 30 percent of these units should be available to families of moderate income, which is 65 percent to 80 percent of the adjusted family median income.

Affordable-workforce housing: Dwelling units that are attainable to the following income levels:

- **Extremely low income households**: households whose incomes do not exceed 30 percent of the median income for the area as determined by the Secretary of the U.S. Department of Housing and Urban Development.
- **Very low income households**: households whose incomes do not exceed 50 percent of the median income for the area as determined by the Secretary of the U.S. Department of Housing and Urban Development.
- **Low income households**: households whose incomes are more than 50 percent but do not exceed 80 percent of the median income for the area as determined by the Secretary of the U.S. Department of Housing and Urban Development.
- **Moderate income households**: households whose incomes are more than 80 percent but do not exceed 120 percent of the median income for the area as determined by the Secretary of the U.S. Department of Housing and Urban Development.

Airport noise impact zones: areas within specific airport generated noise impact Ldn contour lines in which land use should be limited to activities that are not noise sensitive, or where appropriate noise level reduction measures for construction of certain buildings and avigation easements and disclosure statements may be required for land uses which may be otherwise unacceptable.

Arterial road: a road which provides relatively continuous service, high traffic volume, long trip length and high operating speed.

Capital improvement: Physical assets constructed or purchased to provide, improve or replace a public facility and which are large-scale and high in cost. The cost of a capital improvement is generally nonrecurring and may require multi-year financing.

"Coastal Area" of the City of Naples: For planning purposes, the entire City is considered to lie within the Coastal Zone Boundary. This is due to the interrelationships of land and water areas.

Coastal high hazard areas: The area below the elevation of the Category 1 Storm Surge line as established by a Sea, Lake and Overland Surges from Hurricanes (SLOSH) computerized storm surge model.

Coastal Construction Control Line: Pursuant to Section 161.053, Florida Statutes, the Coastal Construction Control Line is a line of jurisdiction, defining the landward limit of the Department of Environmental Protection's authority to regulate construction.

Coastal planning area: Shall be an area of the City's choosing when preparing and implementing all requirements of the coastal management element (except those requirements relating to hurricane evacuation, hazard mitigation, water quality, water quantity, estuarine pollution, or estuarine environmental quality); however, this area must encompass all of the following where they occur within the City's jurisdiction: water and submerged lands of oceanic waterbodies or estuarine waterbodies; shorelines adjacent to oceanic waters or estuaries; coastal barriers; living marine resources; freshwater and tidal wetlands; water-dependent facilities or water-related facilities on oceanic or estuarine waters; or public access facilities to oceanic beaches or estuarine shorelines; and all lands adjacent to such occurrences where development activities would impact the integrity or quality of the above. When preparing and implementing the hurricane evacuation or hazard mitigation requirements of the coastal management element, the coastal planning area shall be those portions of the City's jurisdiction which lie in the hurricane vulnerability zone. When preparing and implementing the requirements of the coastal management element concerning water quality, water quantity, estuarine pollution, or estuarine environmental quality, the coastal planning area shall be all occurrences within the local government's jurisdiction of oceanic waters or estuarine waters.

Collector road: A road that provides service of moderate traffic volume, moderate trip length and operating speed, and collects and distributes traffic between local and arterial roads.

Community character: the overall physical, cultural, and environmental qualities that distinguish a community, including development patterns, architectural character, natural features, public spaces, and the scale and design of buildings and streets.

Compatibility: a condition in which land uses or conditions can coexist in relative proximity to each other in a stable fashion over time such that no use or condition is unduly negatively impacted directly or indirectly by another use or condition (F.S. § 163.3164).

Conservation areas: Locations of critical environmental concern such as mangrove areas, natural drainageways, beaches and freshwater wetlands. This designation also applies to those areas which are presently isolated from urban development and which lack essential public services and facilities. Conservation areas include marginal land, Class II waters, and parks and open space; see Future Land Use and Conservation/Coastal elements of the Comprehensive Plan.

Debt service projections: City's financial obligations for previously funded capital improvement projects, or repayment of revenue bonds.

Development: Carrying out of any building activity or mining operation, the making of any material change in the use or appearance of any structure or land, or the dividing of land into three (3) or more parcels (F.S. § 163.3221(4)).

Development Permit: Includes any building permit, zoning permit, subdivision approval, rezoning, certification, special exception, variance, or any other official action of local government having the effect of permitting the development of land (F.S. § 163.3164(8)).

Effluent: something flowing out of a body of water, sewer or storage tank; for example, wastewater effluent.

Federal Emergency Management Agency (FEMA): the federal agency that, in addition to carrying out other functions, administers the National Flood Insurance Program. For the purpose of measuring building height, FEMA means the lowest floor elevation as required by Article III of Chapter 16 of the Naples Land Development Code.

Flood plains: any land area susceptible to being inundated by water from any source.

Florida-Friendly landscaping: quality landscapes that conserve water, protect the environment, are adaptable to local conditions, and are drought tolerant. The principles of such landscaping include planting the right plant in the right place, efficient watering, appropriate fertilization, mulching, attraction of wildlife, responsible management of yard pests, recycling yard waste, reduction of stormwater runoff, and waterfront protection. Additional components include practices such as landscape planning and design, soil analysis, the appropriate use of solid waste compost, minimizing the use of irrigation, and proper maintenance.

Freshwater wetlands: areas contiguous to, or that provide a continued connection between, surface water areas and tidal waters, mangroves, or marshes. They have a high freshwater table and support water tolerant vegetation.

Goals: long-term end toward which programs and activities are ultimately directed.

Green Jewel Concept: A resilient, interconnected urban landscape that integrates Naples' coastal ecosystems and built environment to reduce risk, enhance mobility, and elevate livability through a cohesive network of green infrastructure, tree canopy, lush plantings, and vibrant public spaces.

Groundwater recharge: Areas where water enters the ground and is stored in an aquifer and is later extracted for public use.

Hazardous waste: Solid waste which may cause or significantly contribute to an increase in mortality or serious illness or which may pose a substantial present or potential hazard to human health or the environment.

High density residential: Intended to accommodate multifamily residential densities of up to eighteen (18) dwelling units per net acre.

Historic resources: Areas, districts or sites containing properties listed on the Florida Master Site File, National Register of Historic Places or designated by a local government as historically, architecturally or archaeologically significant.

Infrastructure: See "Public facilities."

Intensity: an objective measurement of the extent to which land may be developed or used, including the consumption or use of the space above, on, or below ground; the measurement of the use of or demand on natural resources; and the measurement of the use of or demand on facilities and services.

Ldn: a day/night 24-hour average sound level measurement, expressed in decibels, obtained after an addition of ten decibels to sound levels occurring during the nighttime period from 10:00 p.m. to 7:00 a.m.

Level of Service: Indicator of the extent or degree of service provided by, or proposed to be provided by, a facility based on and related to the operational characteristics of the facility. Level of service shall indicate the capacity per unit of demand for each public facility.

Low density residential: Intended to accommodate single family or other similar residential uses of up to approximately six (6) dwelling units per net acre.

Medium density residential: Intended to accommodate single-family and multi-family residential densities of up to twelve (12) dwelling units per net acre.

Mixed use area: Designation to guide the development and redevelopment of bayfront property to allow for water-related and water-dependent uses as well as innovative waterfront development.

Neighborhood character: the distinctive visual, physical, and spatial qualities that define a neighborhood and distinguish it from other areas of the community. Neighborhood character is created by the combination of:

- building scale, massing, and architectural style
- lot size and development pattern
- streetscape design and pedestrian environment
- tree canopy, landscaping, and open space
- the relationship of buildings to streets and public spaces.

Objectives: identify areas of focus.

Open space: Undeveloped land suitable for passive recreation or conservation uses.

PD: Zoning designation for Planned Development. A Planned Development allows a mix of well-designed residential, commercial, recreational and other uses. PD District encourages imaginative, high-quality land planning by approving development compatible with surrounding land and activities.

Point source pollution: Confined point of origin such as pipes, ditches, conduits, or wells from which pollutants are or may be discharged.

Policies: the way in which programs and activities are conducted to achieve an identified goal.

Potable water facilities: System which collects, treats and distributes drinking water; includes water wells, treatment plants, reservoirs and distribution mains.

Public facilities: major capital improvements, including transportation, sanitary sewer, solid waste, drainage, potable water, educational, parks and recreational facilities. For more information, see the Public Facilities and Water Resources Element.

Quality of life: the overall physical, environmental, social, and aesthetic conditions that contribute to the health, safety, comfort, and well-being of residents. Quality of life factors include, but are not limited to:

- preservation of neighborhood character
- environmental quality and access to natural resources
- access to parks, waterfronts, and open space
- safe and efficient mobility
- protection from excessive traffic congestion
- protection from noise, pollution, and incompatible development
- access to public services and community amenities.

Quiet enjoyment: the ability of residents to use and enjoy their homes and neighborhoods in a peaceful and reasonable manner without undue disturbance from excessive noise, traffic, lighting, vibration, or other external impacts generated by nearby land uses or activities.

Resiliency: Degree to which a system or asset rebounds, recoups, or recovers from exposure to climate stressors.

Right-of-way: Land to which the state, county or city owns the fee simple title or has an easement for transportation or utility use.

Saltwater intrusion: Locations where saltwater blends into or intrudes into fresh water.

Scale: the relationship of a building or development to surrounding structures and to the human environment, including:

- building height
- building mass and bulk
- building proportions
- relationship to adjacent buildings
- relationship to the pedestrian environment and streetscape.

Seasonal population: Part-time inhabitants who utilize, or may be expected to utilize public facilities or services, but are not residents. Seasonal population shall include tourists, migrant farm workers, and other short-term and long-term visitors.

Stormwater: The flow of water which results from a rainfall event.

Stormwater facilities: Manmade structures that are part of a stormwater management system designed to collect, convey, hold, divert, or discharge stormwater, and may include stormwater sewers, canals, detention facilities and retention facilities.

Stormwater management system: the stormwater management facilities or structures of the city and all improvements thereto which by this article are constituted as the property and responsibility of the utility, to be operated as an enterprise fund to, among other things, conserve water, control discharges necessitated by rainfall events, incorporate methods to collect, convey, store, absorb, inhibit, treat, use or reuse water to prevent or reduce flooding, over-drainage, environmental degradation and water pollution or otherwise affect the quality and quantity of discharge from such system.

Swales: Depressions, commonly used in landscaping plans to retain and slow the movement of water.

Tidal wetlands: vegetated areas above the low tide mark and below the yearly high storm mark. They are naturally vegetated with salt-tolerant types of grasses, rushes, or some combination of red, black, or white mangroves.

Transition: the planned gradation of development intensity, density, or building scale between areas of differing land use or character in order to maintain compatibility and minimize adverse impacts on adjacent areas. Transition techniques may include:

- reduced building heights
- increased setbacks
- landscape buffers
- step-down building massing
- changes in building orientation
- reduced density or intensity.

Vegetative communities: Ecological communities based on certain soils, vegetation and animals; i.e. coastal strands, oak hammocks and cypress swamps.

Vital Areas: conservation areas which includes marine grass beds, tidal wetlands, freshwater wetlands, Gulf beaches and dunes, and Class II waters.

Water recharge areas: Land or water areas through which groundwater is replenished.

Water-dependent: Development directly carried out on, in or adjacent to a body of water; usage requires access to water.

Water-related: Developments or activities not directly dependent on water access, which may provide goods and services associated with water-dependent uses. All motels and hotels within the City are considered water-related due to their proximity to the beach or bay.

Wellfield: An area consisting of several water well sites which is used for extracting water out of the ground.

Wetlands: those areas that are inundated or saturated by surface water or groundwater at a frequency and a duration sufficient to support, and under normal conditions do support, a prevalence of vegetation typically adapted for life in saturated soils, F.A.C. Ch. 62-340.200, as may be amended from time to time.

~~CITY OF NAPLES COMPREHENSIVE PLAN~~

~~PUBLIC SCHOOL FACILITIES ELEMENT~~

~~Introduction~~ ..... ~~P.S.F.E. 2~~
~~Goal, Objectives and Policies~~ ..... ~~P.S.F.E. 2~~

[The state no longer requires School Concurrency on a statewide basis. Local Governments may optionally extend concurrency so that it applies to public schools and must then comply with 163.3180(6)(a).
The City of Everglades and Marco Island have repealed their Public School Facilities Elements and incorporated necessary requirements into other Elements.
Naples PSFE is generally identical to Collier County's PSFE, but the County's PSFE has not been updated since 2013. Element is stricken, with objectives and policies moved to the other Elements as noted.]

~~INTRODUCTION~~

~~The Public School Facilities Element is an element of the Comprehensive Plan that implements a school concurrency program. This program has been developed, along with the required interlocal agreement, in coordination with the District School Board of Collier County, Collier County and the other municipalities in Collier County. The City will adopt by reference the capital improvement program of the School Board as part of the City's Capital Improvement Element.~~

~~GOAL, OBJECTIVES AND POLICIES~~

~~GOAL:~~

~~To provide for coordinated planning between the City of Naples and the School District and to establish a school concurrency management system to ensure adequate school capacity is available to accommodate enrollment demand as identified in the school district's five-year capital improvement plan.~~

~~**Objective 1-1:**[1] **SCHOOL CONCURRENCY MANAGEMENT SYSTEM.** The City of Naples shall adopt a school concurrency management system to provide school capacity at an adopted level of service standard, measured within School Concurrency Service Area's (CSAs) for each school type (elementary, middle, high) for the long term and five-year planning periods.~~

~~**Policy 1-1.1:** Level of Service (LOS) standards for CSAs shall be based upon permanent FISH capacity: 100% for high school CSAs; 95% for elementary school CSAs; and 95% for middle school CSAs.~~

~~**Policy 1-1.2:** School CSAs shall be established less than district-wide through the merger of Traffic Analysis Zones (TAZs) to establish separate elementary school, middle school and high schools CSAs against which to measure the level of service standard.~~

~~**Policy 1-1.3:** Prior to adopting any change to the CSA boundaries, the City shall require that the School District verify that as a result of the change:~~

~~A. The adopted LOS standards will be achieved and maintained within the five-year planning period; and~~

~~B. The utilization of school capacity will be maximized to the greatest extent possible, taking into account transportation costs, court approved desegregation plans and other relevant factors.~~

[1] This Objective and policies rmoved into the Capital Improvements Element

Policy 1-1.4: The City, in conjunction with the School District, the County and other municipalities within the County shall observe the following process for modifying CSA boundary maps:

A. The School District, in coordination with local governments, shall review the proposed CSA boundaries and the data and analysis used to support the change, and determine whether or not a change is appropriate considering criteria established in Policy 1-1.3. The School District shall transmit supporting data and analysis to the local government for review and comment.

B. Local governments shall review and comment on the proposed changes within forty-five (45) days of receipt.

C. If the proposed change is acceptable to the local government, the change to a CSA boundary shall become effective upon final approval of the new CSA boundary map by the School Board. New maps of the CSA boundaries shall also be included as data and analysis in support of the local government PSFEs.

Objective 1-2:[2] **RESIDENTIAL DEVELOPMENT REVIEW.** The City, in cooperation with the School District, shall ensure a school concurrency evaluation is performed on all non-exempt residential development to verify that new students can be accommodated within the adopted level of service standard established for each school type as measured within a CSA.

Policy 1-2.1: The City shall not approve any non-exempt residential development application for a new residential preliminary plat, site plan or functional equivalent until the School District has issued a School Capacity Availability Determination Letter (SCADL) verifying available capacity to serve the development.

Policy 1-2.2: The City shall consider the following residential uses exempt from the requirements of school concurrency:

A. Single family and mobile home lots of record, existing as of the effective date of school concurrency.

B. Any new residential development that has a final plat or site plan approval or the functional equivalent of a site specific development order as of the effective date of school concurrency.

C. Any amendment to any previously approved residential development order that does not increase the number of dwelling units or change the dwelling unit type (e.g.

[2] This Objective and policies are implemented through the land development regulations

single-family to multi-family).

D. Age-restricted communities with no permanent residents under the age of 18. Exemption of an age-restricted community will be subject to a restrictive covenant limiting the age of permanent residents to 18 years and older.

E. All new residential plats and site plans (or functional equivalent), or amendments to previously approved residential development orders, which are calculated to generate less than one student. Such development shall be subject to payment of school impact fees.

F. Development that has been authorized as a Development of Regional Impact pursuant to Chapter 380, F.S., as of July 1, 2005.

Policy 1-2.3: The City, through its land development regulations, and in conjunction with the School District, shall establish a school concurrency review process for all residential development projects that are not exempt under Policy 1-2.2 of this Element. The minimum process requirements are as follows:

A. A residential development application including a School Impact Analysis (SIA) is submitted to the City for review.

B. The City determines if the application is complete for processing and transmits the complete SIA to the School District for review.

C. The School District reviews the application for available capacity and issues a School Capacity Availability Determination Letter (SCADL) to the City stating:

1. If capacity is available within the affected CSA, the School District shall issue a SCADL verifying available capacity.

2. If capacity is not available within the affected CSA, adjacent CSAs are reviewed for available capacity. If the affected CSA does not contain a particular school type (elementary, middle, high), the adjacent CSA's shall be evaluated for available capacity.

3. If capacity is available in the adjacent CSAs, the School District shall issue a SCADL verifying available capacity in the adjacent CSAs.

4. If capacity is not available in the adjacent CSAs, the School District shall issue a SCADL

indicating the development is not in compliance with the adopted LOSS and offer the applicant the opportunity to negotiate a mitigation plan within a 90-day period.

The Interlocal Agreement for Public School Facility Planning and School Concurrency and this Public School Facilities Element shall provide the process necessary to determine available school capacity for all residential projects that are not exempt under Policy 1-2.2 of this Element.

Policy 1-2.4: The City, in conjunction with the School District, shall review an applicant's residential development proposal for proportionate share mitigation projects to add the school capacity necessary to satisfy the impacts of the proposed residential development.

A. Mitigation options may include, but are not limited to:

1. Contribution of land or payment for land acquisition in conjunction with the provision of additional school capacity; or[3]

2. Mitigation banking based on the construction of a public school facility in exchange for the right to sell capacity credits; or

3. Donation of buildings for use as a primary or alternative learning facility; or

4. Renovation of existing buildings for use as learning facilities; or

5. Construction or expansion of permanent student stations or core capacity; or

6. Construction of a public school facility in advance of the time set forth in the School District Five-Year Capital Facilities Plan.

B. If mitigation is approved, the City and the School District shall enter into an enforceable binding agreement with the applicant. The improvement(s) must be directed by the School District toward a school capacity improvement(s) identified in the School District's Five Year Capital Plan, and the improvement(s) must be reflected in the next update to the County's Capital Improvements Element. Following execution of the

[3] These criteria are very specific but are not in the code. We recommend moving them to Sec 48-121(e) if still relevant.,

~~Agreement, the School District shall issue a SCADL verifying available capacity to support the development.~~

~~C. If mitigation is denied, the City must deny the application based upon a lack of available school capacity.~~

~~**Policy 1-2.5:**[4] Within one (1) year from the effective date of the School Concurrency Growth Management Plan amendments, the City shall adopt school concurrency provisions into its Land Development Regulations (LDR) to implement school concurrency.~~

~~**Objective 1-3:**[5] **SCHOOL LOCATION AND INFRASTRUCTURE.** The City and the School District will: coordinate the location of public schools with the Future Land Use Map and map series to ensure that existing and proposed school facilities are located consistent with existing and proposed residential areas they serve and are proximate to appropriate existing and future land uses, and serve as community focal points; coordinate the location of public school facilities relative to the location of other public facilities such as parks, libraries and community centers to the extent possible; coordinate existing and planned public school facilities with the plans for supporting infrastructure; establish a monitoring group; and address coordination on emergency preparedness issues.~~

~~**Policy 1-3.1:** The City, in conjunction with the School District, shall jointly determine the need for, and timing of, on-site and off-site improvements necessary to support new schools, proposed expansions, construction that changes the primary use of a facility, stadium construction, or construction that results in a greater than five percent increase in student capacity, on a case by case basis, at the time of site planning.~~

~~**Policy 1-3.2:** Prior to commencement of construction of a new school, the City shall enter into an agreement with the School Board identifying the timing, location, and the party or parties responsible for the planning, constructing, operating, and maintaining infrastructure improvements necessary to support a new school or school improvement, and ensure that the necessary infrastructure is in place prior to or concurrent with school construction.~~

~~**Policy 1-3.3:** The City shall review all proposals for new public schools, school expansions, or the redevelopment of existing schools to determine compatibility of school sites and surrounding land uses. City staff shall consider standards such as, but not limited to, building setbacks, buffering, traffic calming, and noise and glare attenuation. City staff shall provide comments~~

[4] This policy is outdated and has been removed entirely.

[5] This Objective and Policies regarding school location improvements moved to Intergovernmental Coordination Element

to the School District for incorporation into the site plan.

Policy 1-3.4: The City, in conjunction with the School District, shall seek opportunities to co-locate schools with public facilities, such as parks, libraries, and community centers, as the need for these facilities is identified. A separate agreement between the District and the City or other appropriate entity, will be developed for each instance of co-location and shared use which addresses legal liability, operating and maintenance costs, scheduling of use, and facility supervision.

Policy 1-3.5: The City, the County, other municipalities within the County, and the School District shall coordinate on emergency preparedness issues.

Policy 1-3.6: The City, the County and other municipalities within the County, in conjunction with the School District, shall establish a Citizen Advisory Group (CAG) to monitor planning and school concurrency in Collier County.

Objective 1-4:[6] **CAPITAL IMPROVEMENTS.** The City shall adopt by reference into its Capital Improvement Element (CIE), the School District's annually updated Five-Year Capital Improvement Plan, as identified in Policy 1-7 in the CIE of its Comprehensive Plan. The Five-Year Capital Improvement Plan identifies the school facility capacity projects necessary to address existing deficiencies and future needs based upon achieving and maintaining the adopted LOS standard for schools.

Policy 1-4.1:[7] The City shall adopt by reference the School District's annually updated Five-Year Capital Improvement Plan, as identified in Policy 1-7 in the CIE of its Comprehensive Plan and as formally adopted by the School Board by October 1st of each year.

Policy 1-4.2:[8] The City, in conjunction with the School District, shall coordinate the long range public school facilities locations with its Comprehensive Plan and Future Land Use Map.

[6] This Objective moved to CCIE.

[7] This Policy moved to CCIE.

[8] Policy has been removed. Redundant to Objective 1-3 above.

~~CITY OF NAPLES COMPREHENSIVE PLAN~~

~~CONCURRENCY MANAGEMENT SYSTEM ELEMENT~~

~~Introduction~~ .....~~C.M.S. 2~~
~~Goal, Objectives and Policies~~ .....~~C.M.S. 2~~

[Element is stricken, with objectives and policies moved to the Concurrency and Capital Improvements Element as noted.]

INTRODUCTION

The purpose of the Concurrency Management System is to establish ongoing mechanisms to ensure that public facilities and services needed to support development are available concurrent with the impacts of such development. In addition, the system sets forth public facility monitoring and funding mechanisms.

GOALS, OBJECTIVES AND POLICIES

Objective 1:[1] Public facilities including roads, sanitary sewer, solid waste, drainage, potable water, parks and recreation, and public schools will be provided at the adopted level of service standard.

Policy 1-1: The adopted level of service standard for each public facility category is outlined below:

Sanitary Sewer: Treatment capacity of 150 gallons per capita, per day.

Potable Water: Provide and treat 300 gallons per capita, per day.

Solid Waste: 1.10 tons per capita, per year.

Parks and Recreation:

PARKLANDS

TYPE	LEVEL OF SERVICE
Community	2 acres/1,000 population
Neighborhood	1 acre/1,000 population

RECREATION FACILITIES

FACILITY	LEVEL OF SERVICE
Basketball Courts	1/5,000 persons
Baseball Fields	1/5,000 persons
Beach Access Points	1/1,000 persons
Boat Ramps	1/9,000 persons
Bike Lanes and Routes	1/1,500 persons
Community Centers	1/9,000 persons
Football Fields	1/11,000 persons
Picnic Areas	1/5,000 persons
Play Areas	1/6,000 persons
Swimming Pools	1/25,000 persons
Tennis Courts	1/5,000 persons
Volleyball Courts	1/4000 persons
Physical Fitness Trails	1/5,000 persons

[1] Objective and Policies moved to CCIE

Roadways: Maintain Level of Service (LOS) C for the City collectors except for Fifth Avenue South between U.S. 41 and Gulf Shore Boulevard. The excepted length of Fifth Avenue South has been defined as a "constrained facility." For County maintained roads (Goodlette-Frank Road, and Golden Gate Parkway, within the City limits, the City shall adopt the County's level of service. These County roads for 2010 are set at LOS E. For the State roads within the City limits (U.S. 41 [S.R. 45 & S.R. 90]), the City shall be consistent with Collier County and adopt LOS E. LOS for City collectors shall be measured by traffic counts at peak hour, peak season. (See Support Document for LOS data.)

Drainage:

CATEGORY	STANDARD
Roadway and Yard	5 Year -1 Hour
Pump Stations	5 Year -1 Hour
Trunk Lines	5 Year -1 Hour
Flood Protection - Building Elevation	100 Year
Water Quality	**Wet Retention** Best Management Practices (refer to Public Facilities and Water Resources Element Policy 1-11) **Dry Retention** 1.25" Minimum **Retention** 0.5" Minimum

Public School Facilities:

FACILITY	LEVEL OF SERVICE
Elementary Schools	95% of CSA Enrollment/FISH Capacity
Middle Schools	95% of CSA Enrollment/FISH Capacity
High Schools	100% of CSA Enrollment/FISH Capacity

Policy 1-2: On an annual basis, the City Planning Department will prepare an annual update of the Capital Improvements Element which will include an analysis of all public facilities for which level of service standards have been established

Policy 1-3:[2] On an annual basis, the City must adopt a Five-Year Capital

[2] Policy moved to CCIE

~~Improvements Program~~

~~**Objective 2:**[3] New development will provide public facilities at the adopted level of service standard concurrent with development impacts.~~

~~**Policy 2-1:**[4] Consistent with public health and safety, sanitary sewer, solid waste, drainage, adequate water supplies, and potable water facilities must be in place and available to serve new development no later than the issuance of a certificate of occupancy or its functional equivalent. Prior to approval of a building permit or its functional equivalent, the City will confirm that adequate water supplies to serve the new development will be available no later than the anticipated date of issuance of a certificate of occupancy or its functional equivalent.~~

~~**Policy 2-2:** Provision of park and recreation areas will be considered concurrent consistent with the following:~~

~~1. At the time the development order or permit is issued, the necessary facilities and services are in place or under actual construction; or~~

~~2. A development order or permit is issued subject to the conditions that, at the time of the issuance of a certificate of occupancy, the acreage for the necessary facilities and services needed to serve the new development is dedicated or acquired by the local government, or funds in the amount of the developer's fair share are committed; and~~

~~a. A development order or permit is issued subject to the conditions that the necessary facilities and services needed to serve the new development are scheduled to be in place or under actual construction not more than one (1) year after issuance of a certificate of occupancy as provided in the City's Five-Year Capital Improvements Program; or~~

~~b. At the time the development order or permit is issued, the necessary facilities and services are the subject of a binding executed agreement which requires the necessary facilities and services to serve the new development to be in place or under actual construction not more than one (1) year after the issuance of a certificate of occupancy; or~~

[3] Objective moved to CCIE

[4] Strike policies and in CCIE, will reference Code of Ordinances Chapter 48, Conditions for Concurrency to avoid inconsistencies.

c. At the time the development order or permit is issued, the necessary facilities and services are guaranteed in an enforceable development agreement, pursuant to Chapter 163.3220, F.S., or an agreement or development order issued pursuant to Chapter 380, F.S., to be in place or under actual construction not more than one (1) year after the issuance of a certificate of occupancy.

Policy 2-3: Provision of roadway facilities will be considered concurrent provided one of the following conditions is met:

1. Required facilities are in place at the time a development order is issued, or are in place or under actual construction not more than three (3) years after the issuance of a building permit or its functional equivalent that results in traffic generation; or

2. The required facilities are the subject of a binding agreement which requires the necessary facilities and services to serve the new development to be in place or under actual construction no more than three (3) years after the issuance of the certificate of occupancy or occupational license; or

3. The required facilities are included in the first three (3) years of the City's or State's adopted budget or the current Five-Year Capital Improvements Program or Element.

Policy 2-4: To ensure that public facilities required to maintain the adopted level of service standard continue to be provided concurrently with development, a development order must be suspended per the following conditions:

1. The required facilities are removed from the City's adopted budget or the current five-year capital improvements program or element or, for traffic circulation level of service, the current state government's five-year budget.

2. The required facilities are withdrawn from annual funding priority because annual funding is insufficient to maintain the City's five-year capital improvement schedule or, for traffic circulation level of service, the state's five-year program.

3. Construction of the required facilities is not undertaken in accordance with the adopted City budget or Capital Improvements Element or, for traffic circulation level of service, the current state government's five-year

budget.

4. The required facilities are not constructed according to the binding contract upon which conditional currency approval was given.

Policy 2-5: Development order applications will be subject to Chapter 48 (Concurrency Management Program) of the Code of Ordinances to ensure that development orders are issued in a manner that will not result in a reduction in the levels of service below the adopted level of service standard for the affected facility.

Policy 2-6: Deny issuance of development orders as defined in Chapter 163.3164, F.S., for any project for which it is determined that the level of service standard in the plan has not been met or for which it is determined that the impacts of the project would result in lowering any level of service standard.

Policy 2-7: A Comprehensive Plan amendment will be required to eliminate, defer or delay construction of any road facility which is needed to maintain the adopted level of service standard and which is listed in the five-year schedule of capital improvements.

Policy 2-10 The concurrency requirement of the Public School Facilities Level of Service Standards of the Comprehensive Plan will be achieved or maintained if any one of the following standards of the Concurrency Management System is met:

1. The necessary facilities and services are in place at the time of final site development plan, final plat or functional equivalent is approved; or

2. The necessary facilities and services are under construction or the contract development plan, final plat or functional equivalent; or

3. The necessary facilities and services are found in the first, second, or third year of the School District of Collier County's financially feasible Five-Year Capital Improvement Plan, as identified in Policy 1-7 of the City's Capital Improvement Element, adopted by the School Board in September of each year and as adopted by reference each year by December 1st, at the time a final site development plan, final plat or functional equivalent is approved; or

4. The necessary facilities and services are the subject of a binding commitment with the developer to contribute proportionate share funding as provided for in Policy 1-2.4 of the Public School Facilities Element, if applicable,

~~or construct the needed facilities.~~

Conservancy of Southwest Florida

Date sent: October 2026

CONSERVANCY of Southwest Florida
OUR WATER, LAND, WILDLIFE, FUTURE.

Naples City Council
735 8th St South
Naples, FL 34102

City of Naples Planning Advisory Board
Planning Department
295 Riverside Circle
Naples, FL 34102

Re: City of Naples Comprehensive Plan Update 2025-2026 including for Resilience, expanded opportunity for public comments due by October 23rd, 2026

Attn:

City Council: Teresa Heitmann, Mayor; Ted Blankenship, Vice Mayor; Berne Barton, Council Member; Bill Kramer, Council Member; John Kroll, Council Member; Scott Schulz, Council Member

Planning Advisory Board: Patrick Coughlan, Chair; John Fowler, Vice Chair; Daniel Barone, Board Member; Joe Blomker, Board Member; John Crees, Board Member; Luke Fredrickson, Board Member; Gregory Kapler, Board Member; Sally Petersen, Alternate Member

CC: Planning Director Erica Martin; Consultant Project Leads

Dear Naples City Council and the Naples Planning Advisory Board,

I am writing you today on behalf of the Conservancy of Southwest and our nearly 4,000 local member and donor families. Of those, 374 members fall within the zip codes that your engagement surveys have targeted. The Conservancy is also a land holder within City limits, as we have ownership of a mangrove parcel in Champney Bay.

The Conservancy's mission is "to protect Southwest Florida's unique natural environment and quality of life...now and forever." As part of that mission, and with respect to building resilience, we advocate for a balanced adaptation approach that strives to protect our natural systems while also capitalizing on their protective capacity for our community and important co-benefits crucial to our nature-based economy and quality of life.

Earlier in the year, we reviewed edits to and submitted comments on the ongoing comprehensive plan voluntary update process the City is pursuing. However, we have since re-reviewed the amended plan to make sure we were looking at the most recent content by accessing the "Extended Public Review Draft"

as available on the Naples2045 website. We appreciate that your consulting group made the edits even clearer within this draft's notation. Since you continue to gather public comment through October 23rd, we are resubmitting some of the prior points we made along with some additions. We have highlighted those changes/additions that are more substantial. We hope these comments will be considered during upcoming Council/PAB meetings where public feedback is discussed relative to the Plan.

We have included very detailed bulleted comments below my signature, with reference to specific edits, which both the Council and PAB have expressed a preference for as articulated in discussions about the comprehensive plan process over the past few months during regular scheduled public meetings.

But overall, we do want to reiterate strong support for the majority of the added content and the new resiliency element. We also recognize that there were many prior ingredients in the plan that already strongly supported a balanced approach to building local resilience. Previous elements, paired with newly introduced content, really appear to be developing a strong foundation for the City to embrace pragmatic principals for Naples' future. This includes smart growth and redevelopment that supports local economics and quality of life, policies that acknowledge the increased risk of developing in high hazard coastal areas, and stewardship of natural systems that are generating resilience benefits along with many crucial services like positively contributing to the quality and quantity of our available drinking water.

We recognize that both Council and the PAB will continue to assess the Plan edits and consider the continued input from many stakeholders including some of the local coalitions of HOAs and Condo Associations, local developers, and other invested parties. Both governing bodies of course need to consider how to strike a balance between the concerns of these different constituents. But we do urge you to largely protect the good work that prior plan elements along with new edits do in service of the collective public interest.

We continue to echo other public comments that suggest enactment of the Plan is the most crucial part of building resilience. It is then especially incumbent upon City Council and other important bodies like the PAB to have members that both are well versed in the Plan and are committed to enforcing it consistently.

We want to note that we are likely to continue monitoring the Plan update process, along with the subsequent proposed code changes that we expect will follow. In particular, we hope to make recommendations in cases where ordinances can be adjusted to further help, rather than hinder, adopting a balanced approach to adaptation including by embracing the use of nature-based strategies.

Also, while we alluded to an in-progress project in our last set of comments from April, we have since completed and released our Working with Nature: Flood Resilience Blueprint (www.conservancy.org/blueprint) which explores nature-based and hybrid flood resilience concepts for characteristic areas in Naples. In our detailed comments, we suggest a few places this foundational work

could plug into the goals articulated in the Plan and may be a useful resource to the City. But we wanted to highlight that more generally here as well. We are hoping to report out on the final project outcomes to City Council and can do so for the PAB if they wish.

Thanks again for allowing us to contribute to the feedback you've been gathering around this important initiative, and for the level of work City staff and governance have been investing in the process.

Sincerely,

Carrie Schuman, PhD
Climate Resilience Advisor
Conservancy of Southwest Florida

Detailed points:

General:

- Our set of comments from earlier in the year referenced some legal context. That included the passage of HB 1217, "Prohibited Governmental Policies Regulating Greenhouse Gas Emissions" by both chambers of the legislature and signed into law earlier this year. While we feel the focus of that bill was a short-sighted action taken by the legislature in a state that is incredibly vulnerable to the effects of climate change, we give kudos to your consulting team and staff for using framing and language within the current comprehensive plan edits that likely avoids any pitfalls with regards to this bill.
- We do urge City Council to continue carefully consulting with City attorneys regarding the best timeline and navigation of the transmittal process for the Plan, given that the damaging implications of SB 180 for home rule were not successfully addressed by the legislature in the 2026 session.
- We agree with other public sentiment expressed around making sure the overall plan has teeth with regards to its language and execution. Certainly, there is a balance to be struck with the visionary purpose of a comprehensive plan in contrast to the more regimented nature of ordinances. But we support continued discourse among the Council and PAB around how to ensure the language has the right level of commitment and certainty, and that there are ways for the City to measure and communicate its progress, including to the public, towards meeting the Plan's direction.

Future Land Use Element:

- Under ***Policy FLU-1.13 Adequate Parking***, there is some constructive language about how new developments should handle parking including the following: "The reduction in parking for new construction shall not result in a reduction of open space or an increase in lot coverage." There could also be additional opportunity here and/or elsewhere within the plan to consider more explicitly addressing permeable/pervious versus non-permeable/non-pervious surfaces, and suggesting or requiring some aspect of their use to help prevent stormwater runoff and non-point source nutrient pollution into our local waters. In most instances where pervious surfaces are discussed throughout, suggestive rather than prescriptive language is used. Among local communities who have these more prescriptive inclusions around permeable surfaces within their comprehensive plans include the Cities of Sanibel and Tampa, and Pinellas and Orange Counties who go as far as to require adherence to Impervious Surface Ratios. Being more proactive about the permeability of groundcover is an important tool in toolbox for managing worsening flooding issues.
- Within the Extended Public Review Draft, we appreciate the newly stated ***Objective FLU-4 Advance the Vision of the Green Jewel***. There is excellent additional language that acknowledges the significant resilience benefits of fostering healthy urban forest canopy and other vegetative cover.

Conservation and Coastal Management Element:

- Under ***Objective CCM-1 Water Quality*** and ***Policy CCM-1.3 Environmental Best Management Practices***, we appreciate the additional language framing the need for best management practices. Anything that can be done to keep excess nutrients out of waterways in the first place will be far more effective and economical for improving water quality than treating water after the fact.
- We strongly recommend the addition of some language under ***Objective CCM-2 Natural Resource Protection*** that acknowledges that many of the policies that occur under this objective need to also be examined through a lens of climate impact and future conditions. For instance, protection of many of our coastal habitats and the subsequent sensitive wildlife activities that happen there (e.g., sea turtle nesting) must also include assessment of how they may be impacted by a changing climate as that may shift the geographic extent of where protective efforts need to occur. The same reasoning can be applied to many of the policies also occurring under ***Objective CCM-4 Minimizing Development Impacts***.
- In order to make ***Policy CCM-3.4 Encourage Additional Public Beach Access and Parking in County*** more congruent with other content in this element focused on natural resource

protection, we suggest additional language encouraging the County to pursue pervious beach parking surfaces like crushed shell.

- This may be the right element to further describe the balance that should be obtained regarding seawalls and other hardened structures along the beach. We are of course aware that there are state regulations that help dictate where seawalls can be placed especially with the consideration of shorebird and sea turtle nesting. However, sea walls and other similar "grey" infrastructure options often can exacerbate erosion and interrupt natural beach processes (which can be detrimental to preserving beach use) while also being costly to install and maintain (IFAS 2023, Climate Adapt 2023) . Also, property owners can over-estimate the protection seawalls provide sometimes resulting in a false sense of security (Nateghi 2016), coined by one research group (Haer et al. 2020) as the "safe development paradox." One way to help preserve more ecological function and create more lines of defense may be the strong encouragement of co-locating/pairing hard infrastructure with concurrent dune establishment/maintenance whenever feasible in order to create a "hybrid" strategy (mix of grey and green solutions). The building blocks for this approach are already in place including with the County dune planting efforts that have been informed by the work of the Naples Botanical Garden and FGCU.
- Although this suggestion comes with challenges, the City may at some point in the future want to consider if they wish to be more conservative with building regulations relative to the coastal construction control line – as outlined in ***Policy 6.7 Coastal Construction*** – than existing state requirements. As noted in a 2024 AtkinsRealis coastal armoring policy study completed for FDEP, the establishment of the CCCL did not take into account the influence of sea level rise. Thus, building seaward of this line, unless it is readjusted for future conditions, makes an already risky proposition even riskier over time.
- We do think the policies under ***Objective CCM-5 Coastal High- Hazard Areas*** will continue to be especially important to enforce in the future due to changing conditions, and as a way to more responsibly protect tax payer resources from excessive risk. However, in the portion of ***Policy CCM-5.6 Public Facilities in Coastal High Hazard Areas*** that references hardening public infrastructure, we would like to see additional language that indicates required hardening is done in a manner that minimizes impacts to surrounding coastal resources and sensitive wildlife activities like sea turtle and shorebird nesting.

Resiliency Element:

- We are extremely pleased to see a complete, dedicated resilience element in this current version of the Plan. This showcases that the City of Naples – within a region of Florida that has been slower to respond to changing conditions than other parts of the State – is a community that has been incredibly proactive in rising to meet the challenge of building local resilience. The

introduction to the element effectively acknowledges recent City efforts as well as the challenges inherent to adapting to extreme conditions.

- We highly support ***Action R-1.1.2*** that specifies revisiting various planning initiatives like the vulnerability assessment (VA) along with the "update" component of ***Objective R-2 Address Infrastructure Vulnerabilities due to Hazards*** and many of the supportive policies and actions. Although there is less certainty about expected updates to crucial supportive data like sea level rise projections released by a NOAA-led interagency task force under the current federal administration, past updates typically have been released every four to five years. Regular updates to the City's efforts in response to changing data (acknowledging capacity and resources of City staff to do so) allow the effective adjustment of strategies based on how our knowledge of future expected conditions continues to evolve.
    - There is also opportunity to incorporate more of a future land use perspective in future iterations of City vulnerability assessments. Many of the current VAs across Florida acknowledge how future conditions will impact currently existing development without considering how growth and development patterns may change. A good example, however, of a VA that does include these elements is the City of Jacksonville's "Resilient Jacksonville" Plan.
- We recommend adding the South Florida Water Management District as one of the entities for data exchange under ***Policy R-1.3 Continued Leadership as a Region***. The District has been incredibly proactive around sharing their findings, data, and tools through a variety of avenues including their quarterly resilience forums.
- With regards to the regional resiliency forums and public workshops item mentioned under ***Action R-1.3.2***, we would note that the Coastal and Heartland National Estuary Partnership (CHNEP) holds a yearly event they currently bill as the Southwest Florida Resiliency Summit. This doesn't mean other regional resilience events would be duplicative, but it might be helpful to see what programming is being featured as part of CHNEP's event, or to reach out to CHNEP as a potential planning resource for these types of forums. Also, it could be appropriate to include some phrasing about partnering with other organizations beyond governmental entities. The Conservancy and other local non-profits and organizations invested in local resilience might also be interested in contributing to content for these types of efforts.
- We support the ideas captured under ***Policy R-2.3 Coalesce Stormwater Planning.*** We want to further suggest that any approach around building resilience to excess stormwater needs to consider multiple objectives. Redirecting water away from local landscapes needs to be balanced with improving water quality and providing for aquifer recharge, especially in the face of increasing periods of drought. As the policy language suggests, incorporating nature-based options may be an especially effective strategy to this end. For instance, the Naples Botanical Garden's stormwater treatment train combines many elements that supports these aims, as does Freedom Park (e.g., vegetated bioswales, raingardens, wetland ponds, etc). That further

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OUR WATER, LAND, WILDLIFE, FUTURE.

points to the fact that there may be significant potential in expanding the focus of the City's Master Parks Plan (we understand a revision is underway, but are not sure what to expect with regards to changes) to really leverage parks and green spaces as an active resilience tool for, among other purposes, expanding stormwater capacity.

- ***Action R-2.5.1*** describes City action around adapting existing roads. If it's not already contained somewhere within the existing Plan or the proposed edits, perhaps some language could be included in the Resiliency or Transportation element around how to assess and consider the resilience of roads that may yet be built to support future development or redevelopment. It will likely cost less to construct more resilient roads at the outset than to later retrofit.
- For those recommendations around public education and awareness which are represented multiple times throughout the resilience element, the City may want to consider how to leverage partnerships to further their reach and capacity, especially around topics and ideas that can be higher-level and more general in nature (communicating risk around different types of flooding sources for example, as opposed to details about a specific City resilience project). For instance, the Florida Silver Jackets, an interagency team that includes local, state and federal entities, has worked with the City of Cedar Key on developing some informative signage and other communications about high water marks from multiple storms and could be a good partner on a future project.
- We would like to reiterate the importance of diverting development away from vulnerable areas as mentioned in ***Policy R-3.5 Divert Development Away from Vulnerable Areas*** of the Extended Public Review Draft (and as already encapsulated in the plan). Future sea level rise projections demonstrate patterns that are exponential in nature, suggesting our communities will only continue to grapple with expanding risk especially within these high hazard areas. Some of the suggested incentives like "clustering" and "density bonuses" also have multiple layers of benefit. Concentrating development and redevelopment rather than supporting continued sprawl preserves the protective benefits of green space, reduces the need for additional supportive infrastructure, and decreases the amount of square footage that will need to potentially be assessed for and bolstered against flooding, high heat, and other risks.
- We strongly support ***Policy R-4.7 Underutilized or Vacant Properties***. These sites can serve as really excellent opportunities to maximize multiple co-benefits and at the same time including stormwater capacity, water quality treatment, and creation of rich community spaces (For a good example, see Conservancy of Southwest Florida case study fact sheet on North Miami's Good Neighbor Stormwater Park).
- Given their robust value in shoreline defense (Sigren et al. 2018, Narayan et al. 2019, Narayan et al. 2025), we are very supportive of the content within ***Policy R-4.9 Sand Dunes or Mangrove Stands***, especially given that these naturally protective habitats already are in less abundance due to coastal development and other activities.

- As mentioned in the body of our starting letter, the Conservancy has completed a project – Working with Nature: Flood Resilience Blueprint – that includes some high-level concepts for characteristic areas of Naples including shorelines and parks. We have spoken about the work before both City Council and the Naples Airport Authority. We want to bring the project to your attention as it might contribute to ***Policies R-3.1 and R-3.6***, as well as multiple policies under ***Objective R-4 Identifying Locations at Risk*** within the newly suggested resilience element, including the policies in the section about adapting shorelines.

Public Facilities and Water Resource Element:

- ***Policy PFWR-4.8 Stormwater as an Alternative Water Supply*** under ***Objective PFWR-4 Protect Groundwater and Aquifer Recharge Areas*** could be further strengthened. Instead of just "recognizing" stormwater as an alternate water supply, language could be added about actively pursuing stormwater retention and adequate biofiltration as strategies for aquifer/groundwater recharge, especially in the face of potential increasing incidences of drought.
- ***Policy PFWR-4.16 Alternative Water Supply and Aquifer Storage Recovery*** seems to be particularly focused on supplementing reclaimed water irrigation. Should it also include alternate drinking water supplies in the language?
- It is clear from the City's pursual of funding, that they continue to work towards ***Action PFWR-8.1.1*** (and newly added ***Policy IC-1.8*** under the ***Intergovernmental Coordination Element***). We just wish to reiterate that with rising sea levels, this will continue to be an even more urgent need as water inundation negatively impacts how traditional septic systems function (EPA 2024, DeAngeli et al. 2026).
- We recommend the addition of a policy under ***Objective PFWR-8 Provide Cost-Effective and Environmentally Responsible Sanitary Sewer Service*** targeting the reduction of wastewater effluent discharge as a result of storm surge. Undoubtedly the City has continued to assess and upgrade components of its wastewater systems, but including a specific policy in the plan would show additional commitment of the City to water quality considerations.

Transportation Element:

- We appreciate existing policies like ***Policy T-1.2 Landscape Buffers & Linear Parks*** and ***Policy T-10.2 Flood Prone Roadways and Solutions for Better Drainage*** that acknowledge how flooded roads can cause disruption of services and the potential for increased flooding impacts to surrounding properties. We also appreciate the inclusion of potential solutions nested under various objectives and policies within the Transportation Element.

Parks, Recreation, and Open Space Element:

- We are pleased to see the reframing of ***Objective PROS-2 Promote Environmental Resiliency and Sustainability*** to include acknowledgment of both resiliency and sustainability. Planning new facilities in light of the recently completed vulnerability assessment is a smart inclusion. We see that further reiterated within newly expanded ***Policy PROS-2.8 Mitigate or Adapt Parks to Flood Risk*** and the inclusion of the vegetative policies (***Policies PROS-2.9 through PROS-2.11***). However, perhaps the new language could also more strongly highlight the great deal of opportunity there is in using parks and open space as a proactive addition to the City's floodwater management strategies instead of just shoring up their vulnerabilities against these impacts. We mention in an earlier targeted comment, that the Master Parks Plan might be the right venue for this focus.

Intergovernmental Coordination Element:

- We are pleased to see the newly added ***Objective IC-4 Interjurisdictional Coordination on Resiliency***. Coordination, most especially on a regional scale, has been particularly challenging in Southwest Florida around climate and resiliency efforts in comparison to some other areas of the State. But we are happy to see the importance of collaboration at multiple scales acknowledged regardless in this section.

Concurrency and Capital Improvements Element:

- We are pleased to see substantial integration of resiliency considerations throughout this section, given how the threats of impacts like flooding and high heat will only continue to increase with changes in future conditions. This includes more explicit expectations around how levels of service should be established. However, it could be useful to note that levels of service may need to be revisited at regular intervals in the future to determine if they are still set suitably for the City's needs. Also, setting levels of service based on return periods (the probability of a storm occurring in any given year) provides flexibility but it should be noted that the conditions associated with specific return periods are expected to increase over time. For instance, the depth of expected flooding associated with a 100-year storm (which has a 1% chance of happening within a given year) in the future will be more than we expect from a current-day 100-year storm.

Jeff Penn

Date sent: October 1, 2026

From: Jeff Penn
To: Erica Martin
Subject: Naples 2045 Comprehensive Plan
Date: Thursday, October 1, 2026 12:36:37 AM

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Dear Ms Martin,
My name is Jeff Penn and I support keeping Naples Pride Fest and other diverse community events in the City of Naples. Such events allow people, such as myself, who have always felt on the outside, who have been told we are an abomination by our own churches and families, to feel a part of something and to be proud of who we are. Please strengthen the Naples 2045 Comprehensive Plan to include a commitment to supporting and preserving diverse special events and ensuring reasonable and equitable opportunities for nonprofit, charitable, cultural, and community organizations to host them.
Thank you.
Sincerely,
Jeff Penn

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Beth Petrunoff

Date sent: October 1, 2026

From: beth petrunoff.net
To: Erica Martin
Subject: Feedback
Date: Thursday, October 1, 2026 4:37:52 PM

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I love the work you and your team have done in this. Thank you. I love that you have retained the vision developed a few years ago with a VERY large sample size from well over 1,000 residents.
Sent from my iPhone
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Anonymous (sender: Flats)

Date sent: October 2, 2026

From: Flats
To: Erica Martin; Council
Date: Friday, October 2, 2026 5:28:12 PM

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To Whom This Way Concern-
Subject: Naples 2045 Comprehensive Plan

I am writing to strongly urge the City of Naples to protect Naples Pride Fest and other diverse community events as an important part of our city's future.

Naples should be a community where everyone has the opportunity to gather, celebrate, contribute, and feel that they belong. Events organized by nonprofit, charitable, cultural, and community organizations strengthen our city by bringing people together, building connections, and ensuring that the many people who call Naples home can see themselves represented in their community.

For that reason, I respectfully ask the City to strengthen the Naples 2045 Comprehensive Plan by including a clear and meaningful commitment to supporting and preserving diverse special events and ensuring reasonable, fair, and equitable opportunities for community organizations to host them.

This is about more than any single event. It is about the values we want Naples to carry into the future. A strong community does not exclude voices or traditions simply because they are different. It creates space for people to come together peacefully, respectfully, and openly.

Naples Pride Fest matters to members of our community, and they deserve the same opportunity to gather and celebrate as others do. Please ensure that the Naples 2045 Comprehensive Plan reflects a Naples that welcomes its entire community and protects opportunities for diverse organizations and events for generations to come.

I urge you to stand for fairness, inclusion, and equal opportunity—and to make that commitment clear in the future we are planning for Naples.

Thank you for your thoughtful consideration.

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records request. If you do not want your e-mail address released in response to a public records request, do not send electronic mail to this office. Instead, you may contact City Hall by phone or in writing.

John F. Baumann

Date sent: October 5, 2026

From: John Baumann
To: Erica Martin
Cc: Mary Baumann
Subject: Comprehensive Plan
Date: Monday, October 5, 2026 7:54:53 PM

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I just finished reading the Plan. Very comprehensive. I had the following comments:
1. We live in an environment that has an abundance of sun yet I didn't see any major plans for incorporating solar energy to help mitigate energy costs. Did I miss it?
2. We are always concerned about droughts and water shortage but I didn't see any plans for creating water capture plans for all homes, condos and commercial properties. Is there one? Has anyone investigated the Bermuda Roof system for capturing rain water and direct it to underground cisterns. The roofs in Bermuda are constructed from limestone , which naturally slows and directs rainwater, and are painted white to reflect UV light and purify the water. Each house captures an average of 350,000 liters of water per year. Could we do this all throughout Collier County.
3. Traffic "in season" is getting worst each year. Not sure I understand how that will, or could, be fixed. You talk about protecting the "green jewel" but to me the green jewel has been way over developed with no apparent slow down in sight. The plan doesn't address how or when development will slow down or cease.

Just a few of my thoughts. Happy to discuss.

John F Baumann
Cell 203-820-1005

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Susan Brown

Date sent: October 5, 2026

From: Susan Brown
To: Erica Martin
Subject: Comment for comp plan 2045
Date: Monday, October 5, 2026 9:24:16 AM

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Erica,
Under conservation….perhaps under ccm 1.5…..I believe the following addition to be important. I would like to see language added to express the following:
To encourage organic methods of pest control and fertilization, less grass or at least indigenous grass and plants, and the planting of useful plants (such as herbs) appropriate for the climate in southern Florida instead of all ornamental plants in both public spaces and private yards.
If I missed this in the plan I apologize.
Thank you.
Susan Brown

Sent from my iPad
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Duncan J. Cameron

Date sent: October 5, 2026

From: Duncan J. Cameron
To: Erica Martin
Subject: Naples" Comprehensive Plan my priorities
Date: Monday, October 5, 2026 3:43:47 PM

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Dear Erica,

My priorities:

Health and Safety

Naples should help our hospitals and clinics by properly maintainting,cleaning and marking all streets and sidewalks in their neighborhoods.

Also, since I am a walker, I need the City of Naples to properly maintain the sidewalks in my neighborhood.

For the Safety of our City, we need to have a well-trained and fully-staffed Police Department.

Thank you, Erica.

Your friend,

Duncan
Duncan J. Cameron
duncCam@AOL.com
1285 Gulfshore Blvd. North, Unit 7-C, Naples, FL 34102-4963
cell -563-528-0757

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Kelley Cole

Date sent: October 5, 2026

From: Kelley Cole
To: Erica Martin
Subject: City Planning
Date: Monday, October 5, 2026 3:46:01 PM

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Hi Erica,

This was the link to share input for City planning. I am a disabled person, live in Naples year-round, and my strongest suggestion is for additional handicap spaces at beach ends. The city has spent a lot of money creating ramps and installing Moby mats for disabled persons, but there is not enough parking for disabled persons. For example, on 8th Avenue South, there is only one handicapped spot and 95% of the time it is occupied. Several days I have driven down over a dozen beach ends and could never find a handicapped parking spot. Parking on the east side of Gulf Shore Boulevard also does not have any handicapped designated areas.

Thank you,
Kelley Cole

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Jose Luis Cuin

Date sent: October 5, 2026

From: jose cuin
To: Erica Martin
Subject: Parks and recreation master plan suggestion
Date: Monday, October 5, 2026 10:19:00 PM

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Hello Ms. Martin,

Thank you for giving us the opportunity to offer feedback on Naples' Comprehensive Plan. As a resident of the city of Naples and a lifelong runner, I am writing to request that the Planning Department evaluate the inclusion of an outdoor **National Fitness Campaign (NFC) Fitness Court** within Baker Park as part of the city's upcoming park infrastructure and capital improvement planning cycle.

As you know, Baker Park serves as a premier urban hub for fitness enthusiasts, families, and runners accessing the Gordon River Greenway. While the park features exceptional trails, it currently lacks a centralized, modern area for high-density, multi-user physical training. The installation of a standardized NFC Fitness Court would address this gap by introducing a free, outdoor bodyweight training ecosystem to our community.

The NFC Fitness Court model aligns perfectly with the City of Naples' master planning and land utilization goals for several key reasons:

- **Minimized Spatial Impact:** The entire ecosystem is pre-engineered to fit a compact **38' x 38' footprint**, allowing it to seamlessly integrate adjacent to existing Baker Park structures or trail access points without disrupting natural green space.
- **Reduced Municipal Overhead:** Unlike fragmented trail equipment spread across long stretches, a centralized "fitness pod" consolidates foundation pouring and safety surfacing into a single concrete pad. This dramatically lowers initial construction mobilization and recurring facility maintenance costs.
- **Strict Liability and Safety Standards:** The station is fully compliant with **ASTM F3101-15 safety standards** for unsupervised public fitness spaces. Its heavy-duty, tamperproof construction is highly resistant to South Florida's intense UV exposure and humid, salt-air environments.
- **Civic Engagement & Digital Integration:** The infrastructure includes a built-in, free mobile training application that provides citizens with guided workouts and virtual coaching, essentially turning a passive park amenity into an active community health platform.

There is already a strong local precedent for this layout. The open-air Fitness Court at The Factory at Paradise Coast Complex has been highly successful and well-received within the county. Bringing a similar, public-tier asset to Baker Park would offer an equitable, world-class wellness solution to downtown residents and visitors alike.

I would Thank you for your time, dedication to our city's infrastructure, and continued leadership in shaping the physical environment of Naples.

Sincerely,

Jose Luis Cuin
Sent from my iPhone

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Colrick Kaufmann

Date sent: October 5, 2026

From: colrickkaufmann
To: Erica Martin
Subject: Dog Park
Date: Monday, October 5, 2026 4:01:03 PM

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Need another dog park. Baker Park dog park always crowded.

Sent from my Galaxy

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Vincent O'Byrne

Date sent: October 5, 2026

From: Vincent O"Byrne
To: Erica Martin; Monique Barnhart; Cait O"Byrne
Subject: Updated Comprehensive plan for Naples Florid 2026
Date: Monday, October 5, 2026 6:45:09 PM

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Dear Erica,

Thanks for the opportunity to comment on this effort on the strategic goals and plans for Naples Florida. It is a comprehensive plan though I have some comments and suggestions that would I believe be of benefit for a strategic plan.

I'd recommend that we add in some numbers and also specific concrete goals so that the follow on ordinances could be judged as being in line with the goals or contrary to them.

For example
1) where we mention the types of parks we have are we suggesting that we increase the square footage of land use set aside for parks? By how much?
2) where we talk about landscaping does that include for example planting trees in Naples? do we actually mention how many we presently have? How many or what percentage we'd like to improve these over the coming five or ten years for example.

Each goal should have a present status and specific goal (e.g. percentage increase/decrease) over the coming time frame.

These are just a couple of examples that would give guidance to the community as to what they can look forward too and could be used as a metric to judge how successful we are in 5,10 years relative to these goals.

All the best

Vincent

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Patricia Patierno

Dates sent: October 5, 2026; October 20, 2026

From: pjp113ma@aol.com
To: Erica Martin
Subject: Naples Comprehensive Plan - Input
Date: Monday, October 5, 2026 3:52:46 PM

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Hello Erica,

Your comprehensive plan book is a lot of pages with a lot of words. But I don't feel that the comprehensive plan and what the planning board and county commissioners approve are of the same intent.

The comprehensive plan book talks about keeping Naples like the old Naples - small and quaint and quiet. That is what the people ask for.

But the planning board - zoning board - county commissioners are approving new building plans that are turning Naples into Miami. Building developments are over-sized on smaller lots. The height of the buildings are given approvals, even though they are over the 2.5 story requirement. The concern of the airport is not being heard. It is enlarging its runways for larger airplanes. That will not quiet the airport.

This plan is all words and no action. It is relaying what the people want. But it is doing nothing to preserve their statements.

It saddens me to see Naples turned into a Miami. It doesn't work there and we shouldn't try to make it work here.

Respectfully,

Patricia Patierno
1761 York Island Drive
Naples, FL 34112

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From: pjp113ma@aol.com
To: Erica Martin
Subject: Comprehensive Plan Input
Date: Tuesday, October 20, 2026 12:33:15 PM

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Hello Erica,

These are just some of my impressions for the City of Naples.

It is being over-built. Naples is letting the big developers with the big lawyers walk all over Naples. If there is zoning, it is being pushed aside for big dollar developments.

Money is dictating what can be built. The people of old Naples are being pushed out and replaced with bigger mansions and fancy cars.

The airport has been enlarged and is now accepting bigger planes. To the detriment to everyone who lives within a 3 mile radius of it. It was done with intent. Intention to bring more private planes and more commercial planes. There is an airport within 1 hour of Naples (RSW) that should be handling the bigger airplane traffic.

Which brings us back to the zoning laws of Naples.

Land is being gobbled up to put MUDS and PUDS. They will make Naples suffer. The only one who wins with these, are the developers. Instead of being held to land requirements, they are putting up houses right on top of each other. Or raising the height of buildings to include mixed-use and residential. The developers will make double or triple the profit, Naples will get the water restrictions, traffic build-up and so much worse. The Zoning Boards and the Commissioners are approving these developments left and right. At some point, you will look at Naples from above and see nothing but roofs and roads. Is that what Naples wants to look like?

The charm of Naples has been turned into a millionaires play ground. That might sound appealing to some, but not all.

I am not sure if this is what you were looking for in asking for input, but just my opinion.

Thanks,
Patricia Patierno
1761 York Island Drive
Naples, FL

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JM Petrillo

Date sent: October 5, 2026

From: JM Petrillo
To: Erica Martin
Subject: Feedback on open/recreation space
Date: Monday, October 5, 2026 3:45:18 PM

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I find that recent decisions regarding the use of public beaches and the current construction plan for the pier are exclusionary, detrimental, discriminatory, and prohibitive to the public.

There has always been inadequate bathroom facilities along the beach...2 miles between the pier and Lowdermilk Park! This has ALWAYS been problematic.

As a daily beach-walker, I can tell you I have seen human excrement, toilet paper, and sanitary products in the berm almost daily...you can blame tourists if you want, but humans need facilities and that cannot be denied. Why not be part of the solution?

Please keep in mind that the residents along the beachfront bought their properties knowing full well that they were purchasing along a public space.

In legal terms it is referred to as "coming to the nuisance". Knowing what they were getting. This is also applicable to the fact that there will no longer be concessions at the pier...because of "potential food smells" for the abutters. What!!!

What is happening to our beach community? God forbid the garlic from Campiellos or Barbatellas blows in the wrong direction. IT'S A MIXED-USE NEIGHBORHOOD. YOU BOUGHT INTO THE NOISE AND THE SMELLS OF THESE PRE-EXISTING AMENTIES TO OUR TOURIST ECONOMY.

You've already seriously limited the lovely live music scene downtown, forcing tourist dollars to Mercato, etc. Now you're continuing down this NIMBE philosophy that is antithetical to what Olde Naples has always been.

It's an incredible shame.

Sent from my T-Mobile 5G Device

Get Outlook for Android

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Christa Suerken

Date sent: October 5, 2026

From: Christa Suerken
To: Erica Martin
Subject: Feedback and concerns
Date: Monday, October 5, 2026 3:45:24 PM

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Hello,
My feedback as to Naples City planning would be to make sure that the tourism during the Winter/Spring season doesn't overly tax the area in terms of traffic as well as cost to the residents that live here in the tourist usage of resources in the area/roads/water/electric. I have a concern that the amount of people visiting and the traffic is more than the city was ever meant to support; and believe that the numbers of tourists should be limited to a certain amount for certain periods of time. Too many tourists all at once also wrecks the vibe and the experience of seeing and visiting the shops and restaurants of old Naples.

In addition, I have concerns about builders expanding in land usage for new construction. There should be no more additional land use projects- also to protect the environment and wildlife. Builders at this point should be forced to only build on land that has already been designated/zoned for buildings/homes and they can tear down old buildings and re-use the land they have rather than expanding. Housing has become too expensive to support for the people who are needed to help residents, such as those that do the gardening, landscaping, cleaning, hospitality/service, and/or medical aides/home health support. I can understand the need for building affordable housing, but only in certain areas. The environment and the wildlife that people come here to enjoy will be wrecked without attention to all of this.

I'm not sure what exact projects are going on or if the above is even the type of feedback you are looking for, but those are my thoughts.

Sincerely,

Christa Suerken, Psy.D., Clinical Psychology
Licensed Psychologist, MN & FL, US; PSYPACY approved
Approbierte Psychologische Psychotherapeutin, Hessen, Germany (currently unregistered)
Tel +1 239 249 0447

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Olya Volpe

Date sent: October 5, 2026

From: Olya Volpe
To: Erica Martin
Subject: Naples 2045
Date: Monday, October 5, 2026 6:09:23 PM

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Hi Erica,

First, I want to recognize the tremendous job the City of Naples has done in keeping our community beautiful, safe, well-maintained, and an exceptional place to live. Naples is a special place, and much of that is the result of thoughtful leadership and a longstanding commitment to protecting the character and quality of our community. As we look toward Naples 2045, I hope we continue to build on that stewardship, particularly when it comes to the architecture and design of future development.

I strongly support requiring significant commercial and multifamily development to undergo a meaningful architectural and design review process before approval. The City should maintain a qualified Design Review Board or architectural committee with appropriate professional expertise and clear authority to evaluate architecture, massing, materials, landscaping, streetscape, compatibility, and, importantly, the long-term contribution a project will make to the character of Naples.

I would also encourage the City to establish design standards that discourage excessive repetition of substantially similar architectural concepts across unrelated developments. Design review should consider not only whether an individual project is attractive or code-compliant in isolation, but whether it contributes architectural diversity, distinction, and a sense of place to the broader Naples community.

We are increasingly seeing similar designs repeated from project to project. Regardless of the architect or developer involved, too much repetition can create a **mass-produced, “cookie-cutter” appearance.** Over time, that risks eroding some of the distinctive character and architectural interest that make Naples special.

Naples should strive for more. The Comprehensive Plan should encourage **design excellence, architectural diversity**, craftsmanship, enduring materials, thoughtful landscaping, and architecture designed specifically for its site and surroundings. New development should complement Naples without simply replicating what has already been built throughout the city.

Communities such as Palm Beach demonstrate that strong architectural standards and thoughtful design review do not have to discourage investment or development. Instead, they can establish an expectation of quality and encourage developers to create projects worthy of their surroundings. Naples should aspire to that same level of stewardship while developing an architectural identity that remains distinctly our own.

Naples 2045 gives us an opportunity to establish that expectation now. **Buildings approved today will define our streets and neighborhoods for fifty years or longer.** The decisions we make about their design will become part of the legacy we leave behind, and we should treat them accordingly.

Thank you for all you do, and here's the Naples remaining beautiful into 2045 and beyond!! <3

Olya

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Scott Perry

Date sent: October 6, 2026

From: Scott Perry
To: Erica Martin
Subject: Comp Plan
Date: Tuesday, October 6, 2026 8:02:41 AM

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1. Development must slow down.
2. We are losing our green spaces, trees, grass and replaced with concrete and condos.
3. You allowed a builder to cut down a Banyan Tree. This must stop. Save the old growth trees
4. Stop the new condos--the roads cant handle the traffic. Roads and red lights have not changed.

Thanks
Scott Perry
239-851-2362 (Mobile)
saperry@comcast.net
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Susan F. Chase

Date sent: October 7, 2026

From: Susan Chase
To: Erica Martin
Subject: Resident Feedback on Comprehensive Plan
Date: Wednesday, October 7, 2026 2:17:23 PM

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This document is very dense and hard to read online. I did my best after one hour of going through it ...but frankly it's bloated and needs more graphics and simplified wording. Perhaps it could be broken down into several documents rather than one giant one.

Four specific comments on the plan, based on my personal issues with Naples/Collier County after living here for three years:

1. I don't see a lot of information about how to provide traffic relief. We need road infrastructure changes and perhaps new roads to manage the extreme volume of cars, particularly in season.
2. The goal of maintaining the tree canopy is a good one; why, then, did the city and county administrators allow a vast number of palm trees, other trees and shrubs to be removed from the intersection of Pine Ridge Road and I-75 (Exit 107)? That removal goes completely against the value of "development of green space." It's a travesty. And much noisier than before the "diverging diamond" intersection.
3. The value of having quiet neighborhoods for its residents is being disregarded by the upcoming project of widening I-75 from Golden Gate to Immokalee Road without providing any additional sound barriers; and by allowing additional commercial flights to Naples Airport. The extreme noise pollution in Olde Naples from jets and airplanes is spreading to the outskirts, including my neighborhood off Whippoorwill Road.

Thank you for considering my viewpoint.

Susan F. Chase
1509 Serrano Circle
Naples FL 34105
susanfchase@gmail.com

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Mary Young (Old Naples Association)

Date sent: October 12, 2026

From:	marycyoung@aol.com
To:	Erica Martin; Gary Young; ddabney@dabneypllc.com; Oldnaplesassociation Info
Subject:	Additional inputs to the Comp Plan 2045 process from the Old Naples Association
Date:	Monday, October 12, 2026 1:28:18 PM
Attachments:	Why Keep City Vision statement as is.pdf ONA_Ten_Principles_Naples_2045_Comp_Plan(3)(3).pdf Naples_2045_25_Priority_FLUE_Amendments_Executive_Summary mcy final2.pdf Naples_Home_Rule_Element_Simplified_Revised(3).pdf

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October 12, 2026

Erica,

Attached please find several documents that the Old Naples Association respectfully submits as additional input to the Comp Plan 2045 review process.

1. Vision – Why we should keep the Vision statement as is with no modifications.
2. "The Naples Ten" – a work product put together by a team of ONA members who analyzed the vast amount of feedback over the years from residents and local businesses through countless surveys and workshops—and identified the values driving this resident and business input. It can be distilled into "the Naples 10" (attached) - a companion document to the Vision Statement. It captures what's important to residents and small business owners across every neighborhood in town. It's specific, aspirational, and summarizes the good work the City has spearheaded over the years.
3. Specific line by line, suggested changes to the FLUE that we believe establish clear, objective and predictable standards against which development and redevelopment can be evaluated.
4. Home Rule and Local Authority Element – The Comp Plan 2045 draft already identifies defense of Home Rule as a priority. This new section addition to the Comp Plan draft would provide goals and policies for how Council should react to threats to our Home Rule and call for resident updates on pre-emptions affecting Naples' ability to implement its Vision and Comprehensive Plan.

We appreciate this opportunity to provide additional input to our previous submittal in February of this year. We ask that you review this information with your staff, the Consultants working on Comp Plan 2045, and of course with the Planning Advisory Board. **We (myself and 2 other board members) would also like to schedule a discussion/review of this material with you and Gary Young as soon as you are available.**

We thank you Erica, and all of the City planning staff, past, present, and future – for the 28 years of thoughtful analysis and commitment to resident engagement as the driving force for our Vision and Comprehensive Plan documents. It is our sincere hope that the Comp Plan 2045 submission to the State will reflect a plan that will protect and preserve what makes our City so special for future generations of Naples residents.

Regards,

Mary Young, President

Old Naples Association

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Naples 2045 Future Land Use Element

25 Priority Amendments — Executive Summary

Old Naples Association

COMMUNITY VALUE — THE OUTCOME, NOT A SUBJECTIVE TEST

The Naples Vision establishes the qualities the City seeks to preserve and enhance. Community Value describes the cumulative outcome when public and private decisions advance those qualities. It is not an independent or subjective approval criterion.

For purposes of these amendments, Community Value is demonstrated through compliance with the Plan's applicable objective standards for compatibility, infrastructure, walkability, environmental stewardship, neighborhood character, human-scale development, economic vitality and property rights.

ONA is not proposing that staff, PAB or Council decide subjectively whether a project creates sufficient Community Value. The Plan should establish clear, objective and predictable standards against which development and redevelopment can be evaluated.

Community Value is the objective. Measurable standards are the test.

I. VISION, COMMUNITY VALUE & PROPERTY RIGHTS

FLUE Reference	Action	Exact Proposed Companion Language	Planning Purpose
1. FLU-3 — Community Value Framework	**ADD**	Community Value Framework. Naples' future will be shaped substantially by reinvestment, redevelopment and adaptive reuse. Such change should advance the City's adopted Vision and strengthen Community Value—the cumulative result of meeting the Plan's objective standards for compatibility, infrastructure, walkability, environmental stewardship, neighborhood character, human-scale development, economic vitality and property rights. Community Value shall not constitute an independent or subjective approval criterion.	Connects redevelopment directly to the Vision while defining Community Value through identifiable planning criteria.
2. FLU-4 — Community Value Goal	**ADD**	Community Value Goal. Preserve and enhance the qualities identified in the Naples Vision through clear and predictable standards governing compatibility, infrastructure, walkability, environmental stewardship, neighborhood character, human scale, economic vitality and property rights.	Makes the Vision operational without creating a subjective balancing test.
3. FLU-4 — Neighborhood Stewardship	**ADD**	Neighborhood Stewardship Goal. Established residential neighborhoods are important long-term community assets. Land-use decisions shall protect their character, stability and livability through the objective compatibility standards of this Plan while respecting lawful property rights and appropriate redevelopment.	Balances neighborhood protection, redevelopment and property rights.
4. FLU-7 — Objective Planning Framework	**REPLACE**	Objective Planning Framework. Development and redevelopment shall be evaluated under the applicable objective standards of this Plan, including building scale and transitions, walkability impacts, infrastructure capacity, environmental performance, neighborhood compatibility and other specifically identified criteria. Compliance with these standards demonstrates consistency with the Community Value framework.	Makes measurable standards—not Community Value itself—the basis for review.
5. FLU-3–12 — Objective Drafting Convention	**MODIFY**	Where a policy establishes an approval criterion or mandatory safeguard, use defined and measurable standards and clear terms such as “shall,” “shall demonstrate,” or “shall not exceed.” Retain discretionary language where flexibility is intentionally appropriate.	Creates greater certainty for residents, property owners, applicants, staff and decision-makers.

II. COMPATIBILITY, SMALL-TOWN CHARACTER & DEVELOPMENT QUALITY

FLUE Reference	Action	Exact Proposed Companion Language	Planning Purpose
6. FLU-9 — Compatibility	**MODIFY**	Compatibility shall be evaluated using applicable objective factors including building mass, scale, height, setbacks and transitions; traffic and parking; hours and operational impacts; noise and lighting; privacy; landscaping and mature tree canopy; streetscape design; and pedestrian conditions.	Converts compatibility and character into observable planning factors.
7. FLU-19/32 — Human Scale	**ADD**	Human-Scale Design Standard. Applicable development standards shall address façade articulation, pedestrian relationship, building transitions, streetscape continuity and the relationship of building mass to adjoining streets and properties.	Defines a central element of small-town feel through observable design characteristics.
8. FLU-20/31 — Neighborhood Transitions	**ADD**	Require graduated transitions, as applicable, in height, massing, setbacks, building orientation and landscape buffering where higher-intensity development adjoins lower-intensity residential areas.	Provides predictable physical protections for adjoining neighborhoods.
9. FLU-17/39 — Trees & Environmental Design	**STRENGTHEN**	Strengthen policies for mature tree preservation, tree-canopy replacement including prioritizing high canopy trees over ornamental palms, permeable surfaces, native or appropriate landscaping, stormwater performance and heat-island reduction using standards established in the Land Development Code or other adopted criteria.	Links the Vision's natural-beauty commitment to defined implementation standards.
10. FLU-21/47–50 — Design Review	**MODIFY**	Design review findings shall identify the applicable adopted architectural, streetscape and site-design criteria and demonstrate how the proposal complies with those criteria.	Promotes design quality while avoiding undefined aesthetic judgments.

III. REDEVELOPMENT, DENSITY & LAND-USE COMPATIBILITY

FLUE Reference	Action	Exact Proposed Companion Language	Planning Purpose
11. FLU-28 — Density / Intensity	**MODIFY**	Maximum density and intensity establish planning limits, subject to lawful and vested rights and all applicable approval requirements. Discretionary increases or flexibility shall require findings of compatibility, infrastructure capacity and consistency with applicable Plan standards.	Distinguishes lawful rights from requests for additional discretionary development flexibility.
12. FLU-18/37 — Development Flexibility	**MODIFY**	Where additional discretionary density, intensity, height or design flexibility is requested, required mitigation or public benefit shall be identifiable, reasonably related and proportional to the requested flexibility and its impacts.	Creates a clearer and more defensible standard for discretionary flexibility.
13. FLU-30 — Lot Assembly	**MODIFY**	Where lot assembly requires discretionary approval or changes the applicable development pattern, review shall address resulting building mass, access, block pattern, traffic, transitions and adjacent-property impacts under adopted standards.	Addresses the measurable consequences of assembled parcels.
14. FLU-33/43–46 — Mixed Use	**MODIFY**	Mixed-use development shall address pedestrian circulation, applicable open-space requirements, operational compatibility and compatibility with adjacent residential uses. Applicable review shall address massing, setbacks, access, loading, lighting, noise and pedestrian conditions.	Supports mixed-use redevelopment while protecting adjoining uses.
15. FLU-34 — Operational Compatibility	**ADD**	Applicable standards shall address hours, loading, lighting, sound, refuse collection, deliveries and service functions where commercial or mixed uses may affect residential properties.	Recognizes that compatibility includes operations as well as physical design.

IV. INFRASTRUCTURE, MOBILITY & PUBLIC REALM

FLUE Reference	Action	Exact Proposed Companion Language	Planning Purpose
16. FLU-15/16 — Infrastructure Capacity	**ADD**	Discretionary development approvals shall include findings, based on available capacity data and adopted levels of service, that required public facilities and services can accommodate the reasonably attributable demands of the proposal or identified mitigation. Development shall not materially reduce adopted levels of service unless impacts are mitigated consistent with adopted standards.	Links development decisions to the City's capacity to support them.
17. FLU-10/61–65 — Cumulative Effects	**ADD**	Where reasonably applicable and supported by available data, discretionary development and applicable Future Land Use Map amendments shall be evaluated for reasonably attributable cumulative effects on transportation, infrastructure, public services, environmental resources and adjacent neighborhoods using identified data and methodology.	Addresses incremental intensification through evidence rather than subjective judgment.
18. FLU-13/14 — Connectivity & Walkability	**ADD**	Redevelopment shall preserve the existing street grid and connectivity unless an alternative is supported by transportation and emergency-access analysis demonstrating equal or better system performance. Pedestrian and bicycle improvements shall strengthen network connectivity while avoiding material adverse traffic, safety or operational impacts on adjacent residential streets.	Supports walkability and connectivity while protecting neighborhood function.
19. FLU-22/36 — Public Realm & Streetscape	**ADD**	Establish applicable standards for shade trees, sidewalk continuity, pedestrian comfort, landscaping, lighting, coordinated signage, visual clutter, streetscape continuity and access management appropriate to the land-use context.	Makes important elements of Naples' sense of place physically identifiable.
20. FLU-38 — Open Space	**MODIFY**	Open space shall be evaluated under applicable standards for function, accessibility, resiliency, connectivity, recreation, landscaping and tree canopy.	Treats open space as functioning community infrastructure rather than simply acreage.

V. DECISION-MAKING, MAP CHANGES & ACCOUNTABILITY

FLUE Reference	Action	Exact Proposed Companion Language	Planning Purpose
21. FLU-9 — Applicant Demonstration	**ADD**	Applicants requesting discretionary approvals shall demonstrate consistency with applicable Future Land Use policies through competent substantial evidence.	Establishes a clear evidentiary basis for discretionary decisions.
22. FLU-11 — Written Findings	**ADD**	Discretionary approvals shall include written findings identifying the applicable Comprehensive Plan criteria and the evidence demonstrating consistency with those criteria.	Improves transparency, consistency and the defensibility of decisions.
23. FLU-56–70 — Future Land Use Map Amendments	**MODIFY**	Future Land Use Map amendments shall include written findings addressing all applicable Plan criteria, including land-use compatibility, density and intensity, transportation, infrastructure capacity, environmental resources, neighborhood transitions and property rights. Community Value is the cumulative outcome of these findings, not an independent approval criterion.	Applies disciplined objective review when the underlying planning framework is proposed to change.
24. FLU-71–80 — Performance Measurement	**ADD**	Establish a periodic Naples 2045 Performance Report using defined indicators such as development activity, infrastructure capacity, tree canopy, pedestrian-network conditions, neighborhood conditions and other measures adopted by the City. Do not create a separate subjective Community Value rating.	Measures whether adopted policies are producing their intended results.
25. FLU-81–83 — Plan Stewardship	**MODIFY**	Periodically review the Future Land Use Map and implementation results against the adopted Vision and the Plan's objective standards for compatibility, infrastructure, mobility, environmental stewardship, neighborhood conditions, economic vitality and property rights. Recommend amendments when evidence demonstrates a need.	Keeps Naples 2045 responsive while preserving the enduring Vision as its long-term guide.

SUMMARY PRINCIPLE

Taken together, these 25 priority amendments reaffirm the Naples Vision, define important elements of small-town character through identifiable planning attributes, respect lawful property rights, protect surrounding owners from incompatible impacts, provide clearer rules for applicants and residents, link redevelopment to infrastructure capacity, and establish measurable accountability. They are intended to guide—not prevent—appropriate investment and redevelopment.

HOME RULE AND LOCAL AUTHORITY ELEMENT

Purpose. To preserve the lawful local authority and institutional capacity necessary to implement the Naples Comprehensive Plan, protect residents and neighborhoods, safeguard municipal assets, and maintain accountability to the people of Naples.

GOAL HR-1: PRESERVE AND LAWFULLY EXERCISE HOME RULE

The City of Naples shall preserve, exercise, and, when appropriate, defend its home rule authority to the fullest extent permitted by the Florida Constitution and applicable law so that the City can implement this Comprehensive Plan and protect community character, quality of life, municipal assets, infrastructure, public safety, and environmental quality.

Policy HR-1.1 — Rule of Construction

Nothing in this Element shall be construed to authorize the City to exercise authority preempted or prohibited by the Florida Constitution, general or special law, or applicable federal law. This Element governs the City's lawful exercise, preservation, monitoring, and defense of municipal authority and implementation of this Comprehensive Plan. It does not independently establish or increase density, intensity, development restrictions, permitting requirements, development-review procedures, or other regulatory burdens on private property.

Policy HR-1.2 — Preserve Local Authority

The City shall implement this Comprehensive Plan in a manner that preserves and lawfully exercises its existing, delegated, and subsequently restored authority over matters of municipal concern. Before entering a material long-term agreement, lease, settlement, or other binding instrument that could limit future City authority, the City shall identify the authority affected, significant long-term consequences, reasonable alternatives, and legally available provisions that preserve future City discretion.

Policy HR-1.3 — Monitor and Respond to Preemption

The City shall maintain a continuing process to identify state, federal, administrative, and judicial actions that materially affect implementation of this Plan. When a material impairment occurs, the City shall evaluate its effect on Naples and timely consider lawful responses, including legislative advocacy, intergovernmental or coalition action, administrative participation, negotiation, and, when supported by the public interest and applicable law, appropriate legal remedies. At least annually, the City Manager and City Attorney shall publicly report significant preemptions, unresolved risks, actions taken, and recommended priorities.

Policy HR-1.4 — Protect Municipal Assets and Governance

The City shall preserve effective local oversight and accountability for municipally owned land, facilities, infrastructure, proprietary interests, and dependent governance structures. Significant long-term commitments involving municipal assets shall be evaluated for their financial, operational, land-use, environmental, governance, community-character, and local-control effects, and shall include appropriate performance, reporting, review, and enforcement provisions when legally permissible.

Policy HR-1.5 — Preserve Implementation Capacity Under Legal Constraint

When superior law limits a preferred local action, the City shall distinguish between actions that are prohibited and actions that remain lawfully available. The City shall use lawful remaining authority and nonregulatory tools—including capital planning, property and contract rights, procurement, voluntary incentives, service delivery, intergovernmental cooperation, public information, legislative relief, and litigation where appropriate—to advance the goals and measurable outcomes of this Plan.

Policy HR-1.6 — Temporary Restrictions and Accountability

A temporary statutory restriction shall not be treated as a permanent statement of City policy. The City may preserve supporting evidence, proposed standards, and implementation options for future consideration when legal authority is restored. Public materials concerning a material transfer or loss of local authority should identify, in plain language, the practical consequences for Naples residents and Plan implementation.

Ten Principles to Guide the Naples 2045 Comprehensive Plan

The Naples 2045 update should be more than a revision of policies and maps. It should answer a fundamental question: What qualities of Naples are we determined to carry forward for the next generation, and how will the Comprehensive Plan ensure that we do? ONA recommends that the following ten principles guide the Plan update.

1. THE NAPLES VISION IS OUR NORTH STAR

For more than two decades, successive City Councils and generations of residents have consistently affirmed the essential qualities embodied in the Naples Vision: small-town feel and charm, natural beauty, sense of place, quality of life, economic vitality, ethical government and active civic engagement. Its longevity is evidence of strength, not obsolescence. A Vision is intended to endure through market cycles and development pressures. Naples 2045 should reaffirm—not redefine—the Vision and require every Plan element to advance it.

2. NAPLES IS A COMMUNITY OF RESIDENTS FIRST

Tourism, visitors, businesses and investment are essential to Naples' vitality, but the City's fundamental responsibility is to the people who live here. Where legitimate interests conflict, the Plan should give priority to residential quality of life, neighborhood integrity, safety, mobility and peaceful enjoyment of property. Naples should welcome visitors without allowing visitor demand to overwhelm the community residents call home.

3. PRESERVE SMALL-TOWN FEEL—AND DEFINE IT

Small-town feel and character are not excuses for subjective decision-making. They can be expressed through recognizable and measurable planning attributes: human scale, neighborhood integrity, walkability, mature tree canopy, natural beauty, architectural quality, attractive streetscapes, civic spaces, environmental quality, appropriate transitions and limited visual clutter. Naples 2045 should identify these characteristics and translate them into objective policies and standards.

4. REPLACE SUBJECTIVITY WITH CLARITY AND CERTAINTY

The Future Land Use Element should replace ambiguous approval language wherever practicable with clear, objective, measurable and predictable standards. This is not anti-development. Developers and property owners gain greater certainty about what can be built; residents understand what will be protected; and staff, PAB and Council have more consistent criteria for decision-making. The same rules should apply predictably to everyone.

5. RESPECT PROPERTY RIGHTS—ON BOTH SIDES

ONA strongly supports private property rights, including lawful use, improvement and redevelopment. But property rights do not stop at the applicant's property line. Florida planning law also recognizes that property owners should be protected from actions by others that harm their property. Naples 2045 should protect lawful and vested rights while using objective compatibility standards to protect surrounding owners and neighborhoods from incompatible impacts.

6. FAVOR INVESTMENT THAT CONTRIBUTES COMMUNITY VALUE

Naples should welcome investment, reinvestment and redevelopment that add lasting value to the community as well as to individual property. Development should contribute to—not unnecessarily consume or extract from—the qualities and public assets that make Naples desirable. Community Value is the outcome; measurable standards for compatibility, infrastructure, environment, neighborhood character, economic vitality and property rights are the test.

7. INVEST FOR THE LONG TERM—ESPECIALLY IN RESILIENCY

Naples must plan beyond individual projects, annual budgets and election cycles. The Plan should commit the City to sustained investment in stormwater, flooding and sea-level resilience, water quality, utilities, beaches, urban tree canopy, transportation and other critical infrastructure. Development decisions should be tied to demonstrated infrastructure capacity so today's growth does not create tomorrow's public liability.

8. PROTECT PEACEFUL ENJOYMENT AND ENVIRONMENTAL QUALITY

Quality of life includes the ability to enjoy one's home and neighborhood without unreasonable intrusion from aircraft, vehicle, commercial and other excessive noise, traffic and environmental impacts. Where City standards establish protections, the City should actively monitor, enforce and pursue available remedies when those standards are exceeded. Quiet, clean air, clean water, safe streets and residential livability are legitimate community assets worthy of protection.

9. MAKE GOVERNMENT ACCOUNTABLE FOR RESULTS

A Comprehensive Plan should not simply state aspirations and disappear onto a shelf. Naples 2045 should establish specific objectives, implementation responsibilities, time horizons and Key Performance Indicators for major goals. Council and the public should receive periodic performance reporting on resiliency, infrastructure capacity, redevelopment, traffic, tree canopy, environmental conditions, neighborhood impacts and implementation of Plan commitments. What matters should be measured; what is promised should be tracked.

10. ACTIVELY DEFEND HOME RULE AND THE COMMUNITY'S ABILITY TO GOVERN ITSELF

The Naples Vision calls on residents to actively engage and defend the qualities they value, and the Naples 2045 draft identifies defense of Home Rule as a priority. ONA supports a new Home Rule Element establishing a continuing City policy to identify threats to local authority, advocate before the Legislature, coordinate with other municipalities, evaluate legal remedies when appropriate, and report publicly on material preemptions affecting Naples' ability to implement its Vision. Home Rule is essential to the City's ability to protect the qualities the Plan promises to preserve.

THE GOVERNING IDEA

Preserve what makes Naples exceptional, welcome investment that strengthens it, establish clear rules for managing change, measure the results, and actively defend the City's ability to determine its own future.

Why Naples Should Retain Its Existing Vision

For many years, preservation has been the organizing principle of Naples' Vision and its North Star for long-term decision-making. This is not a choice between an "old" vision and a more modern one. Preservation should not be characterized as resistance to the future. **In Naples, preservation is the discipline through which change is evaluated: Does a proposed change protect or diminish the character, natural beauty, sense of place and quality of life that make Naples distinctive?**

That philosophy has demonstrated remarkable continuity. In 2007, City Council adopted Preserving Naples: A Vision Plan to Keep the Best of the Past While Building a Better Community for the Future, establishing preservation of Naples' distinctive character and culture as its central principle. The Vision was extensively reassessed through the 2018–2020 public visioning process, formally approved by City Council on May 13, 2021, and reaffirmed when the Vision Element was incorporated into the Comprehensive Plan in August 2024. **It is therefore not an outdated statement awaiting replacement; it is a recently reaffirmed expression of enduring community values.**

The current Vision is fundamentally a preservation and values document. It identifies enduring values and desired outcomes: enduring character; small-town feel and charm; protection and enhancement of the natural environment; sense of place; natural beauty; quality of life; a positive business climate and healthy economy; ethical government; and active citizen engagement and defense of these values. These are not programs or projects. They describe what Naples intends to preserve across generations.

There have been suggestions by other HOA leadership recently that suggest the Vision should be modified and address more specifically subjects such as resiliency and coastal adaptation, infrastructure modernization, redevelopment, mobility and transportation, housing, property rights, environmental policy, economic development, and growth management. **These are important issues, and many of these comments should be incorporated into Comp Plan 2045, but we respectfully suggest they belong principally in the individual elements, goals, objectives, policies, and work plans of the Comprehensive Plan—not in the Vision element.**

Sandy Smyth

Date sent: October 15, 2026

From: Sandy Smyth
To: Erica Martin
Subject: Why the Arts belong in Naples
Date: Thursday, October 15, 2026 6:59:37 PM

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CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Thankyou for this opportunity to express why the Arts are important to our personal and community well-being.
The creative process of art-making connects us to our minds, hearts, bodies and souls, as well as to that in one anothers. What could be more wonderful!
Sincerely,
Sandy Smyth
Digital Artist
NOTIFICATION TO RECIPIENTS: Under Florida law, e-mails created or received by a government agency are public records. Both the message and the e-mail address it was sent from (unless otherwise exempt under Florida law) may be released in response to a public records request. If you do not want your e-mail address released in response to a public records request, do not send electronic mail to this office. Instead, you may contact City Hall by phone or in writing.

Caien Darling

Date sent: October 19, 2026

From: Caien Darling
To: Erica Martin
Subject: Naples 2045
Date: Monday, October 19, 2026 4:56:58 PM

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CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hello,

my name is Cai and I support keeping Naples Pride Fest and other diverse community events in the City of Naples.

Please strengthen the Naples 2045 Comprehensive Plan to include a commitment to supporting and preserving diverse special events and ensuring reasonable and equitable opportunities for nonprofit, charitable, cultural, and community organizations to host them.

I have been a resident of Collier County my entire life, and I strongly feel that these types of events go a long way toward making Naples feel like a welcoming place for everyone who lives and visits here. And considering tourism is such a vital part of our local economy, I'd say that's an immeasurably valuable quality for us to have and hold on to.

Thank you for your attention to this matter. I hope you have a wonderful rest of your day.
NOTIFICATION TO RECIPIENTS: Under Florida law, e-mails created or received by a government agency are public records. Both the message and the e-mail address it was sent from (unless otherwise exempt under Florida law) may be released in response to a public records request. If you do not want your e-mail address released in response to a public records request, do not send electronic mail to this office. Instead, you may contact City Hall by phone or in writing.

Naples Airport Authority

Date sent: October 19, 2026

KAPLAN KIRSCH

DENVER
NEW YORK
SAN FRANCISCO
WASHINGTON, DC

October 19, 2026

VIA E-MAIL: MMCCONNELL@NAPLESGOV.COM

Matthew McConnell, Esq.
City Attorney, City of Naples
Office of the City Attorney
735 8th Street South
Naples, FL 34102

Re: Amendments to the City of Naples Comprehensive Plan

Dear Matthew:

As the City of Naples ('City') considers proposed amendments to the City of Naples Comprehensive Plan ('Plan'), we are submitting these comments on behalf of the City of Naples Airport Authority ('Authority') with regard to the provisions of the July 2026 draft of the proposed Plan that relate to the Naples Municipal Airport ('Airport'). The Authority's Board endorsed these comments during its regular meeting on October 15, 2026, and also requested a written response to these comments from the City.

As you know, land use planning and zoning in and around the Airport has been the subject of many conversations over the years and is currently the subject of formal conflict resolution proceedings (pursuant to Fl. Stat. Ch. 164) between the City and the Authority. We provide these comments in the spirit of cooperation and transparency in the hope that an amended Plan, and subsequent ordinances and policies, will strike the appropriate balance between local and federal authority and will recognize the independence of the Authority over certain Airport land use matters and over Airport operations under both state and federal law.

We are pleased to see multiple references in the Plan to the vital role that the Airport plays in the economic vitality of this community. *See, e.g.,* Vision at V-7, V-9. We applaud the City's recognition of our role in the community. We share your interest in finding effective, practical and legal mechanisms to "curb the noise impacts for the peaceful enjoyment of our homes" within the context of recognizing the importance of the Airport as an economic driver. The objective of ensuring that the Airport can support the local economy is important to both the Authority and the City. *See* Objective T-11.

We also appreciate that the proposed amendments continue existing policies to ensure that development near the Airport will not interfere with the safe operation of the Airport and that residential and other noise-sensitive uses should not be allowed within the 60 dB DNL noise contour, *e.g.,* FLU-8.1 through FLU-8.6. Those policies have served the City, Authority and the

community well over the years, and the Authority fully supports continuing and strengthening those policies.

Given the emphasis in these provisions on noise impacts, however, it would be helpful to acknowledge that the City has no jurisdiction over Airport noise control and that the Authority's powers over both noise abatement and mitigation are severely limited by federal law. We have previously discussed these limitations in public meetings and would be happy to provide more detailed text for the Plan in the interest of transparency. A discussion of these limitations would help avoid public misunderstanding of how these policies can, and cannot, be implemented.

Despite these positive discussions of the role of the Airport, the Authority is concerned that there are numerous statements in the draft Plan which could be understood to purport to regulate aeronautical activity and development at the Airport in a manner that would be inappropriate or preempted by federal law. To reiterate what has been discussed numerous times in the past with the City, federal law preempts local and state regulation of aeronautical functions at the Airport (as defined by the FAA and refined through decades of court decisions). Under principles of preemption, the City does not have the legal authority to regulate aeronautical activities, functions, or development, even in order to address community concerns regarding aircraft noise.

The Authority is concerned that several proposed policies appear to impose or imply City regulatory and approval authority in a manner that would be inconsistent with FAA policy and federal law, including:

- Policy FLU-1.1 inappropriately specifies 40% building coverage for the Airport Commercial zoning district.

- Policy FLU-8 suggests there is a role for the City in the management of the Airport. While we support the objective that the Airport be "managed in a manner which will best serve the overall interests of the community," the Plan should clearly state that management of the Airport is the responsibility of the Authority, not the City.

- Policy FLU-8.3 inaccurately states that a runway safety area, an area defined by the FAA, exists off Airport property. Is this section intended to describe another surface such as the runway protection zone, which is another FAA-defined area that extends beyond Airport property?

- Policies FLU-8.9 through 8.12 are ambiguous and confusing since the term 'Airport Utilization Plan' is not defined, does not have an industry-accepted definition or criteria, and could be misinterpreted to imply that the City has legal authority to approve a master plan for aeronautical uses of the Airport. These sections should emphasize that any utilization plan is limited to matters such as non-aeronautical development and landscaping along Airport Road and North Road, which lie within the City's jurisdiction.

- Policies FLU-8.9 through FLU-8.12 and page 34 of the FLUE inappropriately suggest a role for the City Council in the preparation and approval of an airport master plan and land use decisions on the Airport.

- While we support Policy Objective T-11, several of the subparts of this Objective inappropriately suggest a role for the City in the approval of aeronautical land uses at the Airport.

- Although we also support Policy IC-1.11 pertaining to Airport Zoning Regulations, we note that Action IC-1.11.1 is mostly unrelated to Chapter 333, Florida Statutes and fails to recognize the independence of the Authority by specifying meeting frequency and topics. We urge language that recognizes the value of coordination and cooperation, but does not impose rigid requirements which could prove impractical.

These sections should be revised to acknowledge the City's limited authority under federal law and under principles of intergovernmental immunity under Florida law. Again, the public deserves transparency on this subject and a clear discussion of the limits of City authority would be helpful. For clarity and consistency, we recommend that the Plan adopt the definitions related to airport land uses that the FAA has used in its *Policy Regarding Processing of Land Use Changes*, 88 Fed. Reg. 84,474 (Dec. 8, 2023). This regulatory document represents the latest industry-standard definitions of key land use terms and, since it has been formally promulgated by the FAA, it would be appropriate for the Plan to recognize the distinctions set forth in that Policy. The City may find it appropriate to use the FAA definitions in explaining to the public the City's lack of jurisdiction over aeronautical land uses, its jurisdiction over non-aeronautical land uses, and the ambiguity dictating fact-specific inquiries as to mixed-use and airport-use property, as defined by the FAA.

We reiterate our earlier offer to work with City staff and counsel to develop appropriate language to avoid preemption, to address Florida intergovernmental immunity, to provide greater clarity, and to respect the unique role which the Authority has regarding City regulation of land use at the Airport.

In closing, the Authority applauds the City for its continued efforts to implement land use planning ordinances, policies, and practices to ensure continued compatibility between the City land uses and Airport operations, but cautions the City to ensure that this Plan reflects the limits on state and local authority over aeronautical operations and development.

Sincerely,



Peter J. Kirsch

Counsel to Naples Airport Authority

cc: Mayor and City Council

Gary Young, City Manager
Erica Martin, Director of Planning
NAA Board Members
Chris Rozansky, NAA Executive Director
William L. Owens, Authority Counsel

Principals of Three Naples Businesses

Date sent: October 19, 2026

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MHK
ARCHITECTURE
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October 19, 2026

City of Naples
Planning Advisory Board
735 8th Street South
Naples, FL 34102

RE: Comment Letter on Comprehensive Plan Update

Dear Members of the Naples Planning Advisory Board:

We are writing to provide our comments on the proposed update to the city's Comprehensive Plan. We write as principals of three major Naples-based businesses that own and/or develop commercial and residential property in the city and provide architectural and planning services to residents and businesses. Each of us also is a long-time resident of Naples.

In this context, we wish to express our deep concerns about the substance, direction of this update. The City completed its state-required Comprehensive Plan update in 2025 and its next required update is not due until 2032. This proposed elective update should have a clear purpose and demonstrate benefit to residents and businesses. That justification has not been established, and the proposed draft requires substantial revision. A revised draft should then be made available for meaningful public review and input.

We urge the Planning Advisory Board and City Council to address the five recommendations below before advancing the proposed Comprehensive Plan update. These recommendations are further supported by the detailed comments in Attachments A and B to this letter.

1. **Update the City Vision Statement, the foundation of the Comprehensive Plan**
   The current Vision was developed in 2018-19 and incorporated into the Comprehensive Plan in 2025. Hurricane Ian and subsequent storms have changed our understanding of flood risk, infrastructure needs, and the importance of protecting homes and businesses. The pandemic also brought new residents and significant redevelopment to Naples. Before proceeding with a plan titled "Implementing the Vision," the City should revisit the current Vision. We should establish priorities that reflect these changes and can guide future recovery and resiliency. As we look ahead, we know that Naples will continue to evolve and be impacted by forces and events none of us can fully predict. A vision statement should be aspirational and forward looking. A first step in comprehensive planning for our city should be to have a new process to update our Vision.

2. **Remove vague and subjective language/Use clear, objective and measurable standards.**

   A Comprehensive Plan is an extraordinarily important document. Along with our Land Development Code, it is a primary guide for land use decisions. As described in the Florida Community Planning Act (FCPA), the Plan shall provide the "principles, guidelines, standards, and strategies for the orderly and balanced future economic, social, physical, environmental and fiscal development" of our community.

   In this context, the use of terminology such as "community character," "green jewel," "intensity," and "compatibility" invite inconsistent interpretation given their inherent subjectivity. Proposed Appendix definitions of these and other terms have not resolved that problem. The City should revise or remove such language where it governs development decisions. Subjective language should not be a basis for approving or denying a petition. The language in a Comprehensive Plan should be based on objective, measurable standards.

3. **Remove the provisions in conflict with the protection of residential and commercial property rights.**

   The draft plan contains new policy direction that are both more prescriptive and restrictive regarding matters such as setbacks, building areas, lot coverage, and open space. The purpose would seem to be to create new standards and mandatory bases for subsequent land development code changes. These potential changes, if adopted, would in turn create new requirements for our residents and businesses that have never been properly vetted with affected owners nor discussed at the PAB or City Council.

   The burden of these changes would fall on our residents. Residents seek city assistance to reduce flood risk and improve our infrastructure to protect their property. Commercial properties – including multifamily developments – also are concerned with the implications of this proposed update. These property owners account for the majority of assessed value and property taxes paid in Naples. The City should identify the effects of any new provisions on both residential and commercial properties, provide an opportunity for public review, and remove provisions that conflict with statutory property rights protections.

4. **Remove "implementing" language in conflict with the Florida Community Planning Act and other statutes.**

   The draft includes some 132 "Actions" containing more prescriptive and restrictive language. Many replace policy statements in the current plan; others are entirely new. The Florida Community Planning Act calls for principles and strategies, generally expressed as goals, objectives, and policies, and does not require implementing regulations in the plan. The proposed plan is highly unusual if not unique in comparison to how other localities in Florida have developed their plans. In fact, the statute states that "it is not the intent…to require the inclusion of implementing regulations in the plan".

   PAB and City Council should review each Action to remove detailed regulatory or administrative requirements or restate each as an appropriate policy direction. Implementation should occur through the Land Development Code, annual capital and operating budgets, staff work programs, and other City Council actions, all considered with appropriate public input. This approach also preserves flexibility to adjust implementation timing and tactics without having to submit formal plan amendments to the state.

5. **Remove provisions that conflict with SB 180 before advancing the plan**
   Attachment B identifies 36 examples of proposed policies or Actions that we believe conflict with Section 28 of SB 180. The examples are representative and additional conflicts may exist. SB 180 prohibits covered jurisdictions from proposing or adopting more restrictive or burdensome comprehensive plan amendments before October 1, 2027. The City should compare the draft with the current Plan, identify all provisions that impose additional restrictions or burdens, and remove those prohibited by the law. This review should occur before transmittal or adoption.

Please refer to Attachments A and B for the detailed comments and examples supporting these five recommendations. Attachment A addresses specific provisions by plan element, including property rights and implementation issues. Attachment B provides the comparison of proposed provisions with SB 180. These attachments should guide the City's review and revision of the draft.

We appreciate the opportunity to provide these comments and recommendations. We urge the Planning Advisory Board and City Council to take the necessary steps to further review and modify this proposed update to ensure that it is consistent with the needs of the residents and businesses of our city, protects private property rights, and does not conflict with state statutes that govern comprehensive planning in Florida. This should be carried out with maximum opportunity for public review and input.

Sincerely,

Joan Tobin — Neapolitan Enterprises

Anthony Solomon — The Ronto Group

Matthew Kragh — MHK Architecture

Cc: Members of City Council
Gary Young, City Manager
Erica Martin, Planning Director
Matthew McConnell, City Attorney

Comp Plan Response Letter_10-19-26

Final Audit Report 2026-10-19

Created:	2026-10-19
By:	Michelle Gomez (mgomez@mhkap.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAQadq1O5qxZou8fFHTvy2q6y1p-jGr8P4

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Signer solomona@ronto.com entered name at signing as Anthony Solomon
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Attachment A: Detailed Comments by Proposed Element

Naples 2045 Comprehensive Plan: Implementing the Vision

Introduction

- In the third paragraph, second sentence on Page I-1, there is the first of many references in the update to "community character". Community character is defined in the appendix as the overall physical, cultural, and environmental qualities that distinguish a community, including development patterns, architectural features….". We would contend that Naples, with its many neighborhoods, each with a different development pattern and set of land use features, does not have a single distinguishing "community character" and that the phrase is not appropriate for use in the Comprehensive Plan.

- In the same paragraph, the last sentence states that Naples is "working to manage he negative impacts on the City due to growth on its edges in unincorporated areas…". This statement is problematic in that Naples has no authority to manage this growth outside its boundaries. Perhaps it would be better to state this point in the following way: "Many in Naples are also concerned with the level of growth in unincorporated areas of Collier County, particularly just outside the city limits.

- The first sentence, fourth paragraph, on Page I-1, should be revised to state "To address these core issues, the City will use this Naples 2045 Comprehensive Plan, its Land Development Code, and other regulatory and policy tools to guide….".

- This same paragraph discusses "community priorities" but does not use the language in the Vision Statement as one would expect. Protecting "community character" is again introduced as a priority. How would one accomplish this?

- On Page I-1-2, there is a summary of the Vision Element. Why do this when it is redundant with the next Element in the Plan (Element 2) which is the Vision is in its full presentation. However, the five components of the Vision should be the "priorities" articulated in the preceding paragraph.

- In the first paragraph on Page I-4, it states that the Comprehensive Plan, per the Florida Community Planning Act, is designed as a blueprint for development, establishes the regulatory framework for growth, and is used as a guide for land use decision making. We believe this is a misleading and inaccurate statement as to the purpose of the comprehensive plan as described in the FCPA, While the comprehensive plan should provide "guidelines for development per the statute, the Act clearly states that "it is not the intent of the Act to require inclusion of implementing regulations in the Plan.' It goes on to state that "the Plan should establish meaningful and predictable standards for the use and development of land and provide meaningful guidelines of the content of more detailed land development and use regulations."

- This is one of many examples where the language of the proposed plan contemplates a "regulatory" or "implementation" role which should be reserved for subsequent actions with

respect to the Land Development Code and other mechanisms. In fact, in later paragraphs on Page I-4, this very point is made when the plan states that "the Plan is distinct from the city's regulations found in the LDC", and (later) that "it is a long-range policy document." It is inconsistent not to mention in conflict with the FCPA to say on the one hand that the plan is distinct from implementation and then propose 111 separate actions in the plan aimed at implementation.

- On Page I-8, Naples is described as a city of "modest residential scale development". This is difficult to comport with varying scale of development found, for example, along Gulf Shore Boulevard or even in a number of residential neighborhoods like Port Royal. Naples is a city with great diversity in the scale of residential development from neighborhood to neighborhood and even within neighborhoods.

- On Page I-10, it states that "the planning process does not end with the adoption of the Plan. The next step is implementation which takes the form of actions that include development standards, special studies, intergovernmental agreements, capital investments, …." This statement makes the point we have tried to make above. The Comprehensive Plan is not about implementation. Implementation follows through a number of different mechanism based on the guidelines and principles contained in the Comprehensive Plan.

- On Page I-10, Item F states that we should review Collier County plans and codes and regional and state regulations to ensure compatibility…". Of course, we need to follow any regional and state regulations that apply to us but it is not clear why we should be trying to ensure compatibility with Collier County plans and codes given that they are much more permissive than their city of Naples counterparts.

- On Page I-11, under Key Performance Indicators, it states that "Naples will identify KPIs". It should be more specific as to who is responsible for this (I.e. the City Manager? The Planning Department?, etc).

- On Page I-22, the discussion on Future Land Use suggests that little will change in Naples over the 10-year and 20-year planning horizons with respect to land use designations in the city (residential use, commercial/mixed use, recreation and open space, etc).

- On Page I-23, the Housing discussion is confusing, stating that the city has 18,720 of which 52% were "occupied" and the remainder classified as "vacant, including seasonally vacant". This could benefit from more specificity. We all know that Naples has very few truly "vacant" units. Adding some rigor to this analysis of our housing stock would be useful, particularly given how important it is to our city.

Vision Element

- City staff has stated that the previously approved Vision Statement will be in the amended plan unchanged. This is mostly accurate.

- There is a new paragraph added at the top of page V-1 that states the Vision provides the "fundamental guidance used to update Goals, Objectives, Policies, and Actions in the 2045 Comp Plan". The language in this paragraph should be broadened to also recognize the guidance from the public input workshops, work carried out by consultants and staff, and input from residents and businesses.

- On page V-1 the section titled "Background" has been changed to "Introduction" and the first paragraph has been deleted. The elimination of this paragraph results in an awkward transition that doesn't really provide a proper introduction. New introductory language should be incorporated here.

- At the end of the "Introduction" section on page V-1 there is a new paragraph that states that as part of this Comp Plan update, "the Vision was again assessed and reaffirmed through the responses of residents". This is an over-statement given the limited participation in the workshops and surveys.

- On page V-2 in the introductory paragraph to the "Our Place" section, it states 32% of respondents listed 'Naples small town character and culture' as reason for choosing to reside in Naples. It then goes on to overstate that this response indicates "that preserving the City's distinctive identity, scale and sense of place is central to why people choose to live in Naples." Folks are not moving here to "preserve" Naples, they are moving here to enjoy Naples's character and culture; an important distinction.

- Beginning on page V-10, the "Vision Work Plan" which was developed to guide staff implementation of the Vision after the it was adopted in 2020 has been deleted from this Element - properly so. It is out of date and deals with specific implementation items, many of which are completed or not relevant.

- The section titled "Strategic Steps" on page V-9, should be deleted. It addresses top priority initiatives established in 2020 by a different Council and are arguably out of date. Further, it is a level of implementation that does not belong in the Comp Plan let alone a "Vision Element.".

- More broadly, while Vision statements are commonly found among local governments in Florida as part of their planning processes, they almost always are much shorter statements than found in Naples, typically one or two paragraphs or even one sentence. They tend to be an aspirational declaration outlining a community or county's long-term goals for the future or desired future state. There is no mention in the Florida Community Planning Act of a requirement for developing a Vision. The inclusion of this element is entirely discretionary and would not therefore impact positively or negatively the review of the plan by the State.

- Finally, the suggested title of this amended Comp Plan is: "Naples 2045: Implementing the

Vision". This is misleading in the sense that a Vision Statement (such as the five priorities identified in the Naples Vision) are aspirational and general. There should be alignment between the Vision and the Comp Plan but, again, this is nothing that is required by the Florida Community Planning Act.

Future Land Use Element

- The Introduction section to the FLU Element (Pages FLU-2- thru FLU-5) contains a litany of statements that are incorrect or misleading.

    - Page FLU-2 in the first paragraph, it states that the principal purpose of the FLU Element is to "establish the physical framework, design character, and appearance of the city." In the following sentence, it adds the words "character" and "that are supported by the residents of the Naples. There are no references in the Florida Community Planning Act statutory language regarding the FLU which talk about "design character" or for that matter, "appearance". While the physical framework is described in the FLU (indications of desirable future land use supported by a FLU Map), "design character" and "appearance" are not established by the FLU but at most derived from it and other implementing mechanisms (the DRB Handbook, the Land Development code, etc.

    - The second sentence of this paragraph (Page FLU-2), the statement that this establishes the relationship, balance and character of land uses. This is an over-statement. The FLU establishes classifications, uses, heights, open space possibilities, and density limits, but it does not deal with "relationship, balance and character." Further, "character" as elsewhere in the document is a vague and poorly defined term. IN addition, the newly added statement that this is all "supported by the residents of Naples" has no basis. If this statement remains in the final approved plan, it could only be stated that this view is supported by staff and city council. Again, in the second paragraph, third bullet point, Page FLU-2, the word "character" is added with no basis or definition. At the bottom of the page FLU-2 the document again over-steps with comments like its purpose is to outline "desired project appearance, design character and attributes". The word "character" crops up again in the last paragraph on this page with again no context or definition.

    - On page FLU-3 of the Introduction section, a series of goals, objectives, policies and actions are listed "to provide guidance for future growth and development". Most are benign, but several raise concerns. For example:

        - #4 used to simply say "protect and enrich the environment" but has been amended to connect protecting the environment to supporting "community character" whatever community character means. How will this be measured?

        - #5 calls for establishing "a long-term plan for downtown, Gordon Riverfront, Miracle Mile (apparently a new addition) and Naples Bayfront development/redevelopment". There is no discussion as to why these areas have been chosen or in most cases carried forward. Is the intention to re-envision the "downtown" and Naples Bayfront?

        - #7 is a totally new addition relating resilient infrastructure design to "community character."

        - #9 is a totally new addition stating "reduce impacts of adjacent development on

established neighborhoods." Impacts must be thoughtfully and carefully considered as to ensure that new development and redevelopment is protected as provided in the Property Rights Element

- #11 uses the terms "residential character and charm" with no definition
- #13 states that the airport is operated in the best interests of the "residents of City". This is new language replacing language that the airport should be operated "in the best interests of the community." Oddly, this latter statement is still present later in the FLU (Objective FLU-8, page FLU31)
- #16 makes references to workforce housing and "needed" housing opportunities. This is welcome but oddly inconsistent with the language in the Housing Element which essentially outsources all responsibility for workforce and affordable housing to Collier County.

- Page FLU -6 — Third paragraph, second sentence again has an inappropriate use of the Word "character".

- On page FLU-6, the Goal statement has been rewritten in part to say "Land development or redevelopment applications that are not in compliance with one or more of the policies shall be found to be inconsistent with the Comprehensive Plan." This is one of the most important sentences in the document because it makes clear why each policy in the plan must be clear and fair given how it could be used by the city in the evaluating development petitions. Clarity should be provided to better understand if an application fails one policy is it determined to have failed the entire Comp Plan?

- Objective FLU-1 (page FLU -7) — "community character" again referenced without definition or context.

- In Policy FLU-1.1 (page FLU-7) the existing language defining the "permitted intensity/density" in each land use designation has been changed to "maximum intensity/density." This change fundamentally alters and restricts the rights of existing property owners. "Permitted" indicates "as-of-right" while "maximum" indicates a range or threshold. This change inserts regulatory uncertainty, makes land use decisions much more subjective and is inconsistent with the property rights protections provided in the Property Rights Element.

- In Policy FLU-1.2 (page FLU-8) the existing language is revised to change "permitted" to "allowed" and now requires all new development to be consistent with allowed uses in Policy FLU-1.1 and each Future Land Use category. There are several problems with this change. First, Policy FLU-1.1 does not provide a list of "allowed" uses; second, there are once again subtle implications in this language change. "Permitted" indicates a use as-of-right while "allowed" introduces broad subjectivity and regulatory uncertainty for development and redevelopment.

    - We have identified and described in Attachment B to this letter 19 examples in the FLU Element along of Policies or Actions that appear to be inconsistent with SB 180. The

comments below further highlight many of these. As a general comment ALL "actions" should be returned, or revised as, to Policies or removed all together. "Actions" are by definition implementation. The Plan defines "Actions" as "actionable strategies that involve performing a task or producing a deliverable." The FCPA specifically states that the purpose of the Comprehensive Plan is not implementation. Implementation is to be carried out through other mechanisms including the Land Development Code, the capital budget and the operating budget, among other mechanisms. Including specific prescriptive implementing actions in the Comp Plan is not only in conflict with the FCPA but often with SB 180. Further, including such "actions" in the Comp Plan means they can only be modified through a Comp Plan amendment which must be approved by the State, as opposed to articulating through other mechanisms outside the Comp Plan

- The use of "Actions", particularly in the FLU Element, is inconsistent and random. For example:
  - Under Objective 1, there are 25 policies. But only Policy 19 related to air quality, arguably one of the most difficult areas for a local government to influence, where there are five specific action steps listed, and Policy 22 Intermodal Facilities, where there is one "action", have actions listed. Why there but not with the other policies? Or better said, why with any of the policies?
  - Under Objective 2, there are three policies - One has two Actions, the other two have none.
  - Under Objective 3, there are five policies, One has an Action, the other four do not.
  - Under Objective 4, there are 10 policies. Policies 4.1, 4.2, 4.3 and 4.10 have Actions, the others do not.
  - Under Objective 5, there are five policies. One (5.3) has an action, the others do not.
  - Under Objective 6, there are 16 policies. Policies 6.1 thru 6.7 each contain specific actions, as does 6.12. Policies 6.8 thru 6.11 and 6.13 thru 6.16 contain none.
  - Under Objective 7, there is one policy and it contains two specific actions.
  - Under Objective 8, there are 12 policies. Two contain actions.

- As stated above, we do not believe that it is consistent with the FCPA to include "Actions: in the Comprehensive Plan. However, the inconsistent utilization of this mechanism offers further reason to remove or revise these statements.

- Policy 1.13, Page FLU-10 — New language is added that states that "the reduction in parking for new construction shall not result in a reduction of open space or an increase in lot coverage." This

introduces a new, more restrictive and burdensome requirement that is not permitted under SB 180.

- Policy FLU 1.16, Page FLU-11, Why is CPTED added when its already addressed in the Design Review Handbook and Policy FLU-1.3?

- Policy FLU-1.23 Page FLU-13, how are the off-site pedestrian connections mentioned going to be enforced?

- Policy FLU- 1.25, Page FLU-14 calls for "encouraging creation of greener public spaces…". Will there be additional allowances for setbacks and height to encourage implementation?

- In Policy FLU- 3.3 on Page FLU-16, the words "Environmentally sensitive areas" have been added. How are these areas going to be defined? Most of GSBN could be impacted by how this is defined. Is the exception for residential limited to single family residential or does it include multifamily as well?

- Objective FLU -4, page FLU-17, Advance the Vision of the Green Jewel" Why is marketing language included in the Comp Plan?

- Policy FLU - 4.1 - Promote Florida-Friendly Landscaping, pages FLU 17 and 18, Will there be incentives to help implement installation and maintenance of Florida Friendly Landscaping?

- Action FLU-4.1.2 calls for the consideration of changes to open space requirements seemingly at the expense of current buildable area. This raises the possibility of a more burdensome restriction on redevelopment and development of any property within the City.

- Action FLU-4.3.1 expands protection of large canopy trees to include those that are privately owned. This would seem to be in conflict with state statutes beyond SB 180. The incentives mentioned in Action FLU-4.3.4 seem much more feasible.

- Objective FLU-5 Page FLU-22. There is an overarching theme in this Element of "protecting residential neighborhoods" that does not appear to be found in survey results or actual conditions. Where are examples of residential neighborhoods under attack? Additionally if the "protection" being sought is from redevelopment of private residential property (larger elevated houses), that would appear to be directly contradictory to the desire for climate adaptations, flood mitigation and resiliency efforts.

- Policy FLU-5.3, Page FLU-22, replaces "inconsistent" with "incompatible" thereby introducing regulatory uncertainly and additional subjectively when evaluating new development. Buffers and Transitions — this language is very vague and unclear as to purpose and intent. Also is followed by an "action" that should be part of the policy.

- Objective FLU-6, Page FLU-23 Protect Community Character, is an entirely new and problematic objective. This section deals with "Placekeeping" which is defined as protecting and preserving existing important long-standing "assets" in our built environment. This is commendable but

belongs as part of the Historic Preservation discussion. This Objective also has policies that are followed by specific "actions" which should be restated as part of policy statements or removed entirely.

- Action FLU-6.2.1 calls for a one-time analysis of recent development projects to identify "opportunity for improvement regarding character and design" and "utilize recommendations to propose amendments to the Land Development Code or the Design Review Handbook." Is this meant to be in a public forum? Are approved projects at risk? Is this an attempt to revisit land use decisions already approved by staff and/or Council?

- Policy FLU-6.4 Page FLU-26. "Align Development Standards with Established Character and the Green Jewel Concept." This is a strange concept. Arguably the application of existing development standards has resulted in the current/established character so well loved by residents. Intent of any other approach would appear to be motivated by NIMBY-ism.

- Action FLU-6.4.2 proposes to apply City Charter restrictions to long established multifamily districts possibly resulting in substantial reduction in redevelopment potential these properties have held for decades. This language appears to be a direct result of the code compliant redevelopment along GSBN following Hurricane Ian and other recent storms with real legal implications for the City. Any new development regulations resulting from this would be more burdensome and in violation of SB180 and well as the Property Rights Element of the Comp Plan.

- Action FLU-6.4.3 proposes consideration of new burdensome regulations on single family properties to include more open space and require landscaping surely coming at the cost of current buildable areas.

- Action FLU-6.4.4. This item suggests new land development regulations to limit "large homes" on "smaller lots." Current land development regulations already employ a sophisticated maximum building coverage calculation that is a function of the individual lot size. This is an unnecessary addition that will not provide any net benefit and would likely be opposed by the great majority of residents.

- Policy FLU-6.5 page FLU 26. What is a "character element"? How is it defined? Who determines which "character elements" warrant protection?

- Policy FLU-6.6 There is reference to an Old Naples Area Study "to guide architectural and site designs to protect residential character". This sounds like a separate zoning code for Old Naples which has certainly not been vetted with residents of Old Naples.

- Policy FLU-6.7, through Policies 6,16 Page FLU -27,28 and 29) —Protect Historically and Architecturally Significant Resources and related matters. These sections add a number of "actions" that are inappropriately prescriptive and should be converted to policy statements if retained at all.

- It should be noted that the extent and detail of these proposed historic preservation policies and actions are out of proportion to the limited amount of historic resources we have in Naples.

- Policy FLU-6.16 (Page FLU-125) - Expand Healthy Community Initiatives in Naples — is an example of a very prescriptive and very vague initiative.

- Objective FLU-7, (Page FLU-30 and 31) - This section acknowledges the diversity of residential neighborhoods in our city. However the "how" of neighborhood planning should not be prescribed in the Comp Plan but left for appropriate subsequent implementation by staff and Council.

- Objective FLU-8, (Pages FLU 31, 2, and 33) — Naples Municipal Airport. Our concerns with this Objective and Policies are outlined in our cover letter.

- In the final paragraph on page 33 of Generalized Future Land Use, the word "character" has been added to the statement "The Future Land Use Map is not intended to be used as a zoning map, but rather as a general indicator of desirable future land use and 'character' relationships." This addition is problematic because once again the definition provided for "character" or "community character" is much too broad and even if it were well defined a 2D map cannot display a 3D experience. "Character" should be removed from this sentence.

- The second paragraph under the Residential heading on page FLU-34 includes a final sentence "Is the intent of the Future Land Use element to retain the predominant residential character of the City and promote balanced redevelopment and infill residential development that achieves residents' desired protection of community character." How is the "balance" going to be measured? Where are examples of our residential neighborhoods being threatened? How has recent redevelopment and development, otherwise compliant with code, impacted community character? This statement seems to be an unsupported Trojan Horse.

- The first paragraph under the Commercial heading on page FLU-36 changes the introductory sentence to read "…commercial enterprises which primarily support residents while also supporting the tourist population…" Why is this distinction being drawn? Why are we pitting one population against another? Will commercial projects that "support tourists" have to meet different standards than those "primarily supporting" residents? How will this even be measured and implemented?

- Under the Waterfront Mixed Use heading on page FLU-37 it mentions "General Development Site Plan Review" process. Is that still the correct name for the review process?

- What is the rationale of including "primary" and "secondary" uses within each designation as introduced on page FLU-43. This is more appropriate as an implementation function of the code of ordinances rather than in the Future Land Use element of the Comp Plan.

- As introduced on page FLU-43 What is the expected function of the "pattern" and "character" examples for each designation? Will this be carried forward into zoning code changes?

- Beginning on page FLU-44 and continuing through page FLU-78, the plan highlights each land use designating which is a duplication of information already provided in the 'Generalized Future Land Use' section. Why ? Generally, the addition of the "Building Blocks" introduces potentially new and poorly defined standards without an understanding of any unintended consequences.

Housing Element

- The first section of the Housing Element is a "Statement of Purpose". While this appears to be a holdover from the existing Comp Plan, it is an oddity in that there is no other element of the proposed Comp Plan with a statement of purpose. This is inconsistent and in a different format from the rest of the Plan.

- This update to the Housing Element proposes to out-source virtually all responsibility for providing affordable housing to Collier County through more than 50 "county policies" and "joint city-county policies" most of which are directed to the county for implementation.

- There is no rationale given for this approach nor is there any indication that this approach has been discussed, vetted, or approved by Collier County.

- The first paragraph of this section states that the purpose of the Housing Element, per the Florida Community Planning Act (FCPA), is to "create an adequate supply of decent, safe, sanitary and affordable housing for all city and county residents." This is the stated goal, although on page H-5, the goal is redefined as "for all residents of Collier County" - no mention of City of Naples.

- Does the PAB and City Council wish to have a comprehensive plan that essentially abandons its public responsibility for affordable housing, abdicating it to another local jurisdiction? While we all know that the opportunities for creating affordable housing in Naples are limited given its compact size and high land values, there are a number of existing affordable properties (George Washington Carver, Jasmine Cay, the Jade, Stillwater Cove, and others) that the city should seek to retain as affordable. Also there are and will be opportunities for new small-scale affordable housing development as well.

- The FCPA specifically describes the purpose of the Housing Element as providing housing, eliminating substandard housing, improving existing housing, and providing adequate sites for future housing (including affordable housing) "for current and future residents of the jurisdiction". There is no language stating or implying that responsibility can be out-sourced to a neighboring jurisdiction.

- The Statement of Purpose also includes a list of recommendations such as "creation of a non-profit housing corporation" and "establish a comprehensive housing delivery system". These and other recommendations appear to be left-over from the prior/existing Comp Plan. Has an inventory of existing housing units been established? Are the housing codes reviewed every two years? Have any of the previously identified Goals, Objectives and Polices been accomplished? These issues should be clarified or removed from the plan.

- The Introduction section (page H-3 and H-4) provides historic information concerning City and County actions to address housing issues individually or jointly. It would seem to make sense that the Statement of Purpose and the Introduction sections of this Element should be consolidated into one section for clarity and to remove redundancy.

- The Introduction section (page H-4) also references an inventory and analysis of existing

housing stock as a basis for the proposed Goals, Objectives, Policies and Actions of the Housing Element. But specific figures, data and analysis unique to the City appears to be missing in the remaining language of the element.

- Missing from anywhere in the Statement of Purpose or Introduction is reference to the role the CRA plays in enforcing and encouraging Housing policies within the City. Most if not all of the existing affordable housing properties in Naples are located in the CRA and opportunities for new affordable housing are most likely to occur in this area. The absence of mention of the CRA in this context is puzzling.

- There are a number of examples of policy language that appears outdated and/or no longer relevant. For example, Policy H-1.1 references a deadline of January 14, 2014 to establish methods of indexing demand for very low, low, moderate and affordable workforce housing. Why is this still included in this form? Has this goal still not been met? If so, should the deadline be updated or should this policy be eliminated?

- Similarly, Policy H-1.2 references a deadline of January 14, 2014 to establish methods of indexing availability for very low, low, moderate and affordable workforce housing. As with the prior comment, why is this deadline presumably over 12 years past due?

- Similarly, Policy H-1.3 references a deadline of January 14, 2014 to establish methods of predicting future need. Again, why has this deadline not been met or updated?

- Similarly, Policy H-1.4 references a deadline of January 14, 2015 to establish strategies to support the Objective. Why has this deadline not been met or updated?

- Joint City-Couty Policy H-1.5 provides for annual reports beginning June 2014 to the Board of County Commissioners. Why aren't these reports also provided to City Council as well.

- Policy H-1.6 states the City and County shall maintain an interlocal agreement that requires the city "to provide their proportionate share of affordable housing or provide the financial equivalent to the county." This is a strong, positive statement that is not referenced nor reinforced in any "city policies" in the document.

- Policy H-1.8 , on the other hand, states that the county and city may consolidate their housing programs and activities, which seems to be at odds with Policy H-1.6.

- More broadly, how can the City create and set in its Comp Plan policies for the County without their permission and agreement (examples include Policy H-1.10 and policy H-1.11, among others)? Note that there are no "City Policies" mentioned under Objective H.1, arguably the most substantive and important objective in this Element.

- Under Objective H.2, there is one City Policy, Policy H-2.8 which is to provide financial and technical assistance to the residents of the Carver/River Park neighborhood. It is not clear what the geographic definition of this "neighborhood" is.

- Objective H.3 talks about preserving and protecting residential neighborhoods through housing programs using CDBG and SHIP funds among other means. This language seems to imply objectives beyond affordable housing, if so, why is this a joint policy with the County? The title of this Objective title should be revised to include the word “affordable”.

- The three City policies that are included in Objective H-3 should be revised to clarify the land area and/or boundaries that apply (presumably River Park East).

- The language of Policy H-3.4 makes no sense in that it seems to imply that it extends to areas beyond those eligible for SHIP and CDBG programs.

- The language of Policy H-3.5 addresses revisions to the Code of Ordinances that would appear to be in conflict with the Private Property Rights Element of the Plan.

- Policy H-3.6 speaks to implementing housing maintenance codes. If this has already been accomplished why does this remain in the Plan? Furthermore, the language implies there is some sort of threat to the preservation and protection of residential neighborhoods. Does this mean all residential neighborhoods or only those only with affordable housing? Where is the data that has identified this threat to residential neighborhoods?

- Objective H-4 language seems to only reference County housing codes and County substandard housing stock with no specific City policies proposed.

- Objective H-5 talks about the conservation of historic homes. This section would seem to fit better with the historic preservation portion of the FLU Element.
- Policy H-5.4 references a 2019 deadline that has expired. If this policy has not been completed or additional studies are required, new deadlines should be incorporated into the policy language.

- Objective H-6 addresses Group Homes, giving responsibility to the County to monitor state and federal regulations. Why are there joint City/County policies when the City is not included in the Objective language?

- Objective H-8 deals entirely with county use of CDBG, Ship and other funding to address housing needs in Immokalee and other poor rural areas of the county. There are no city policies or even joint city-county policies under this objective. Why have it in the City Comp Plan.

- The same can be said about Objective H-9 regarding energy efficiency. Energy efficiency is an important public purpose. Either the city should develop its own standards regarding affordable housing or it should not be in our plan.

- In summary, the Housing Element is, inconsistent in application, reflects no acknowledgement of recent changes at the state level with respect to affordable housing policies, does not propose local policies aligning with Live Local legislation, and bears no relationship to the reality on the ground in Naples and the genuine need for affordable/workforce housing. This proposed draft

needs to be completely reconsidered and rewritten to address the real affordable housing needs of Naples.

Conservation & Coastal Management Element

- The Goal statement on Page CCM-2 has new language that states "Restrict development activities that damage or destroy coastal resources." This is presumably to be defined through the subsequent Objectives and Policies but still risks standing in conflict with SB 180.

- Policy CCM-1.1 on Page CCM-3 states that the "City shall reduce point source and non-point source discharges…". It would be preferable to observe that the city will at minimum meet all state and federal pollution discharge requirements. Not only is this a more accurate way to state this but it would be language that would not be in conflict with SB 180.

- In addition, Policy CCM 1.1 has new language calling for best management practices such as the creation of "low impact development." It is not clear what this means or how the City might accomplish this.

- Actions CCM-1.1.1, 1.3.1, and 1.3.2 on Page CCCM-3 should be converted back into Policy statements.

- Policy CCM-2.12 on Page CCM-6 is unclear as to intent and what it is suggesting (i.e. "recommend projects that could change surface and groundwater flow"). This seems counter-intuitive to what the City's objectives should be. While this policy is a carry-over from the current plan, it should be reviewed and possible revised or removed.

- Policy CCM-3.1 on Page CCM-7 is poorly written and imprecise with the use of language "maximum extent" possible" that does not reflect a measurable standard. In addition, it risks conflict with SB 180. We suggest that the proposed new language in this policy be replaced with the following: "…as provided by the City's Land Development Code and other relevant local, regional, state, and federal requirements.

- Action CCM-3.3.1 on Page CCM-7is very specific and should be converted into a policy statement that is implemented by subsequent action through our Land Development Code or other mechanisms.

- Policy CCM-3.3 on Page CCM-7 should make clear it referring to Opportunities for Recreation on "publicly accessible" coastal resources.

- Policy CCM-3.4 on Page CCM-7 calls for encouraging Collier County to expand public beach parking and parking facilities. We are just a few years away from the proposed Clam Pass Parking Garage controversy that many city residents opposed, Do we want a statement in the Plan seemingly endorsing county projects like that? If so, how would we rationalize not supporting similar projects in the city?

- Policy CCM-4.7 on Page CCM-9 discusses implementation of the Naples Land Conservation Program through the Naples Land Conservation Trust Fund. While a carry-over provision from the current plan, we are not aware that these activities still exist and are operational. If not, this policy should be removed.

- Policy CCM-4.10 on Page CCM-9 discusses a requirement for environmental impact assessments and mitigation plans for development within Conservation Areas. While again a carry-over from the current plan, it is not clear under what authority this requirement exists (city code? State or federal requirement?). This should be clarified or the policy removed.

- Objective CCM-5 and the subsequent Policies on Page CCM-10 discussed Coastal High Hazard Areas and development within them. The State is the primary regulator of development in CHHA's and development within them must follow state regulation. This basic point should be made clear in the language for this Objective and Policies.

- In this same section, Policy CCM-5.4 on Page CCM-10 contains new language regarding regulation of development in the CHHA "…to account for current and future flood risk to the extent practicable". This has two problems. First, such development is already regulated. Second, the new language is imprecise and not measurable to any standard.

- Actions CCM-6.4.1 on Page CCM-12 and Actions CCM-7.5.1 and 7.5.2 on Page CCM-13 should be converted back to Policy statements.

- On Pages CCM-15 and 16, there is discussion and descriptions of "Environmentally Sensitive Habitat Classification". There is no context for why this is provided and it does not follow the normal template of Goals, Objectives, and Policies. Perhaps this should be part of the Appendices section of the Plan. If it remains as part of this Element, it should have clarification as to its purpose.

Resiliency Element

- The Resiliency Element is an important addition to the city's Comprehensive Plan given the importance of resiliency planning to our city and the world we now live in. Unfortunately, the current version of this Element misses the mark in terms of wat it proposes …and also what it does not include.

- The current draft reads as something that may make sense for a much larger city or county but not for a community of the size or with the needs of Naples. Perhaps this is because the consultant retained to write this section is more familiar working with larger jurisdictions across the state and has not "right-sized" these ideas for Naples.

- This Element provides a "to do" list of some 22 "Actions that would involve enormous amounts of data gathering and analysis…as well as report writing, development of new procedures, intergovernmental coordination, and outreach. This is couched in very prescriptive language that is inappropriate for use in a comprehensive plan.

- Further, carrying this forward would require the city to add considerable staff resources either internally or through consultants. This would come with a significant cost. Is the work to be carried out through this analysis, data gathering and report writing worth the investment?

- Naples has been a leader, to its credit, in recent years among local governments in Florida (especially Southwest Florida), in developing Climate Vulnerability Assessments, Climate Adaptation Plans, Stormwater Management Mater Plans, and carrying out individual projects like the Gulf Shore Boulevard Beach Outfalls project. The proposed Resiliency Element provides some limited recognition of these efforts in its Introduction section, but essentially not background and context beyond that. If it had, one would have reached the conclusion that much of the necessary planning and analytical work had already been completed, and our primary resiliency goal now should be continued follow-through o these efforts.

- Naples should continue to focus on Resiliency as a top priority. But it should do by reducing flood risk and providing assistance to residents and businesses that are struggling with ways to protect their properties. We need to encourage and facilitate redevelopment efforts that result in properties that are more resilient, as well as invest in infrastructure that better protects existing development. Thess should be the focus of the Resiliency Element of the Plan.

- In addition, this new Element should be written in a manner consistent with the FCPA, SB 180, and any other relevant state statutes. We believe that certain of the "Policies" and "Actions" in the proposed update are in violation of SB 180. This includes at minimum: Actions R-3.2.1 and R-3.2.2 (associated with Policy R-3.2), Policy R-3.4, Policy R-4.3Action R-4.4.1, Policy R-4.9 and related Action R-4.9.1, Policy R-4.10, and Policy R-4.11. In Attachment B to this comment letter, we provide more detailed information and rationale for why they should be removed or revised.

- Beyond that, we recommend that all 'Actions" in this Element, whether in conflict with SB 180 or not, be removed or integrated into the corresponding "Policy" statement to ensure conformance with the FCPA. Specific prescriptive direction and implementation is not a purpose of a

Comprehensive Plan.

- Policy R-2.3 is particularly problematic. What does "Coalesce Stormwater Planning" mean? Beyond that, the implementation steps identified in this policy are very detailed and prescriptive. They should be left to staff to best determine and bring back to Council in the context of annual budgets and work programs.

- Policy R-3.1 and Action R-3.1.1 talks about mapping and identifying strategies for neighborhoods at risk of flooding. All neighborhoods in Naples are at some level of flooding risk. Studies and plans already carried out have identified these relative risks to a great degree.

- This Element also has been prepared with a different format than the other Elements. In addition to the conventional template of Goals, Objectives, and Policies (to which "Actions" have been added), there are seemingly random other "headers" throughout this section. These include: 1) Data Collection and Analysis, 2) Integrating Sea Level Rise and Flood Risk into Capital Planning Decisions, 3) Include Resiliency Strategies into Public Facilities and Capital Improvement Planning, 4) Collaboration and Outreach on Adaptation Response, 5) Funding Adaptation Response, 6) How we Build to Improve Resiliency, 7) Private Property Adaptation, and 8) Outreach and Education to Home and Business Owners. These are are positioned with no context underneath various Objectives and Policies. This is confusing and should be addressed.

Public Facilities and Water Resources Element

- The last sentence in the second paragraph of the Introduction to this Element (Page PFWR-1) states that "this Element sets forth the principles, guidelines, standards, and strategies for…." To be consistent with other Elements in the Plan and also with the FCPA, it would be more appropriate to say "it sets forth the goals, objectives, and policies…".

- The first sentence of the third paragraph (Page PFWR-1) says that "this Element supports and implements the Vision Element of the Comprehensive Plan". The Vision Element is already an Element of the existing Comprehensive Plan having been added in the 2025 update. Further, the Vision stands as an aspirational statement that should be aligned with the Comprehensive Plan and Land Development Code. The purpose of a Comprehensive Plan is not to carry out implementation but to state general goals, objectives and policies regarding the future land development and land uses of our community.

- In the fourth paragraph of the Introduction on Page PFWR-1, it states that "implementation of (this Element) occurs through capital improvement programming, development review procedures, intergovernmental coordination…." (and other mechanisms). We agree and this makes our larger point that it is not appropriate nor consistent with state statutes to posit specific "Actions" in this or other Elements of the Comprehensive Plan.

- On pages PFWR-2, 3 and 4 of the Introduction section for this Element there is detailed information provided on population projections, potable water and sanitary sewer, stormwater management, solid waste, and other matters. This information is very detailed, indeed much too detailed for the Introduction section, and therefore leaves the reader confused as to its need and purpose. No other Introduction section for other Elements has such detail. If there is need for such information at all, it should be placed later in this Element, perhaps in tabular form.

- On Page PFWR-6, the word "and" should be added between the words "Program" and "approved" in the last line of Policy PFWR-1.1.

- On Page PFWR-8, Policy PFWR-1.11, Stormwater Design and Attenuation Standards is both confusing as to its purpose and overly prescriptive and detailed as well. Paragraphs A and B also seem redundant with Paragraph C. This Policy describes standards and criteria that may well change over time, whether due to City of Naples actions or the actions of other regional or state agencies. Providing this level of detail also sets up the practical problem of having to go through periodic amendments to the plan as these standards change. Overall, the current presentation and language is confusing and unhelpful as to intent and purpose.

- Policy PFWR-1.12 on Page PFWR-9 states that stormwater management best practices are to be implemented through a Stormwater Ordinance and Standards Handbook. This would seem to be an accurate statement but there is no explanation of how this relates to what is in the preceding Policy PFWR-1.11. Further, this is likely in conflict with SB 180 given that new design assumptions may require larger systems or reduce usable site area.

- Policy PFWR-2.6, Waterwise Irrigation and Florida-Friendly Landscaping Standards is written to

both “promote” but also “require”. Which is it and how should it be written to be consistent with the FCPA and SB 180.

- Policy PFWR- 3.14 (Page PFWR-18) regarding Coordination of data collection and analysis efforts is a word salad that makes no sense (“effort to better coalesce efforts”). There is no way to understand what should be done and by whom.

- Policy PFWR - 3.8 (Page PFWR-17 extends stormwater best practices to “all development including maximizing green space onsite and minimizing impervious surfaces”. This is likely in conflict with SB 180, but also vague in its language. “Maximize” and “minimize” lack measurable end points and can be utilized in a discretionary manner. Objective standards are needed, which are best addressed in an implementing ordinance, not a comprehensive plan.

- Policy PFWR-3.10 states that private development includes “maintenance plans for stormwater management lakes”. This is likely in conflict with SB 180 as it contemplates a more burdensome requirement.

- Policy PFWR-7.5 (Page PFWR-23) encourages the siting of houses on lots to take account of prevailing winds, angle of sun, etc, to “promote homeowner affordability”. It would seem that these are decisions to be made by the homeowner themselves (assuming they are following all city development and building codes) and further it is not clear what the connection of these issues are to “affordability”.

- Policy PFWR-7.5 deals with Energy-Efficient Landscaping Practices through “Florida-Friendly Landscaping”. But it is not clear what the goal is: to reduce non-invasive vegetation, to reduce irrigation needs, or some combination of these objectives. Nor is it clear who the audience is for this policy recommendation.

- Finally, this Element contains 14 specific “Actions”. These statements should be re-written or reincorporated as general policies or removed entirely with the understanding that they would be addressed subsequently through the implementation steps taken by the city or restored and re-integrated in this update as general policy language.

Transportation Element

- The last clause of the Goal statement on Page T-4, "respect the distinctive character of the City of Naples", should be removed as it is vague and cannot be interpreted in a way that relates to the objectives and policies of this Element. There is no single, unified "character" to Naples that is definable for purposes of a comprehensive plan or Land Development Code.

- Policy T-1.1 and the subsequent Action T-1.1.1 on Page T-5 has language that is in conflict with SB 180 ("Evaluate and regulate all proposed development projects"). This statement also flies in the face of what is actually occurring with new development in the city. Multi-family projects are generally less dense than prior development and more SF homes are occupied for only part of the year. This would suggest that development trends are actually reducing traffic volume generated by new city development.

- Objective T-3 on Page T-10 addresses the need to utilize Complete Street principles, with a number of subsequent Policies and Actions listed in furtherance of this. As a general comment, a majority of Naples City Council has not supported for the past 6 years the core Complete principles of enhanced bike lanes and improved pedestrian access. In addition, Policy T-3.4 and related Actions T-3.4.1 and T-3.4.2 on Page T-11 have requirements that are in conflict with SB 180 by adding more restrictive and burdensome language to the Comprehensive Plan.

- Policy T-3.5 and related Action T-3.5.1 is difficult to understand as to their purpose. Is it about public safety (reducing vehicle crashes) or improving water quality (reducing impervious areas)? Suggesting that separating the distance between driveway access points seems to be problematic in terms of its potential impact on our residential neighborhoods. This provision is likely in conflict with SB 180.

- Objective T-11 and the related Policies deals with the Naples Airport. Our comments on this section are contained under Items #7 in our comment letter.

- In addition to Actions T-1.1.1, t-3.4.1 and 3.4.2, which we believe to be in conflict with SB 180, there are eleven (11) other actions in the Transportation Element. As with other Elements, we recommend that be re-written as "Policy" statements to ensure compatibility with the FCPA. This would also allow staff to determine best how to properly implement these "actions" in ways that are feasible and affordable.

Parks, Recreation and Open Space Element

- The Introduction narrative on Page PROS-1 is well done but it is inconsistent with the tone, format and style of many of the other Elements. Specifically, this is the only Element that provides its own analysis against the Vision Element. Either all Elements should incorporate this format or none.

- The first sentence should read that the intent of this element is to establish goals, objective and policies to …." It is not to outline strategies and initiatives, per the FCPA.

- The list of public recreation facilities, parks and beach access points on pages PROS-2 and 3 provides good and relevant information.

- The first full paragraph on page PROS -3 contains several incorrect statements. The word "strategies" in the second sentence should be "policies". In the last sentence, it should read that the city "and the county" maintain the 9.1 miles of beaches.

- The Goal statement on page PROS-4 should include the word "maintain, I.e "to plan, develop and maintain"… and the final sentence is unnecessary and should be removed.

- Objective PROS-1 on page PROS-5 uses the term "Green Jewel". This is a problematic, undefined term that should be removed.

- Policy PROS 1.1 on page PROS-5 has three specific action steps that should read instead as policy statements. These should be restored to Policies. What is the distinction and difference between Policies and Actions? How did former Policies become relegated to Actions?

- Action PROS-1.2.1 under Policy PROS- 1.2 (page PROS-6) should be returned to a Policy. What is the distinction and difference between Policies and Actions? How did former Policies become relegated to Actions?

- Policy PROS-1.8 provides a directive to update the Code of Ordinances to include new requirements to provide more functional and accessible open space areas for multifamily, mixed use and commercial project where before only applied to office complexes and commercial centers. This language introduces new restrictions to development that will have very real unintended consequences. This type of change requires real debate before adoption.

- Policy PROS-2.8 — The word "Mitigate" should be removed.

- Policy PROS -2.10 Will the "Florida Friendly landscaping" requirement apply solely to public land or private lands as well?

- Policy PROS- 3.1. The Cost Recovery Policies for parks, recreation facilities and programs is poorly defined as full cost recovery is not feasible. What does this mean?

- Policy PROS-3.3 — Fair-share funding coordination with Collier County is poorly defined as to

the purpose.

- Policy PROS-4.6 - Collier County Recreational Program Coordination. Where is the data to support that the City is burdened by Collier County residents in recreational and special needs programs? What does burdened mean?

- Objective PROS-5. The deletion of 'residents' and the addition of 'while prioritizing residents' is unnecessary to state.

- Policy PROS 5.3 (page PROS-10) includes Action PROS-5.3.1 and Action PROS-5.3.2. These should be restated as policies. What is the distinction and difference between Policies and Actions? How did former Policies become relegated to Actions?

Intergovernmental Coordination Element

- The Introduction to this Element has language that is inconsistent with the description of this Element in the FCPA. The statute states that the Inter Governmental Coordination Element should show "relationships and state principles and guidelines in coordinating the comprehensive plan with the plans of school boards, adjacent municipalities, etc". The statute says nothing about implementation nor "actions" that should be taken in this regard.

- There are 18 detailed, prescriptive "actions" listed in this Element. Some are carry-overs from the current plan that were originally written as "Policies". Some are new statements. They include: Actions IC- 1.1.1, 1.1.2, 1.1.3, 1.1.4, and 1.1.5 on Page IC-3, Actions IC-1.2.1, IC- 1.2.2, and IC-1.3.1 on Page IC-4, Actions IC-1.7.1 and IC-1.7.2 on Page IC-5, Actions IC-1.11.1 and IC-2.1.1 on Page IC-6, Actions IC-2.1.2, 2.1.3, and 2.1.4 on Page IC-7, Action IC-5.4.1 on Page IC-12, and Actions IC-5.4.2 and IC-5.5.1 on Page IC-13. We recommend that these proposed "Actions be restated as policies or removed entirely from the document as suggested below..

- In general, the tone of this Element is one of the City "instructing" or "directing" other governmental entities (in particular the County and the Airport) as to what to do and how to do it, particularly as it relates to land use. The reality is that coordination is always a two-way street. The FCPA states that coordination of the Comp Plan with the plans of other governmental units does not extend to "regulatory over the use of land"

- Policy IC-1.2 and related Actions IC-1.2.1 and IC-1.2.2 appear to be entirely aspirational given the disparities in Land Development Code standards between the City and County.

- Policy IC-1.3 and related Action IC-1.3.1 addresses service boundary agreements with Collier County. The City and County already have such agreements to provide water service and sanitary service to designated areas outside the city jurisdictional boundaries. It is not clear why there is need to establish a "new Interlock Service Boundary Agreement" with the county. Further, it is not clear that "establishing a process for land use decisions" as part of this (stated in Action IC-1.3.1 is consistent with the FCPA.

- Action IC-1.7.1 describes a "joint intergovernmental planning agreement" between the city and county "to review development proposals outside of the respective jurisdictions…and evaluate the impacts". We are not aware of any formal agreement in this regard. Our understanding is that any interactions between city and county planning staffs are voluntary and ad hoc. Of course, the City has no authority in this regard outside its own jurisdiction. This should be clarified.

- Policy IC-1.9 addresses Conflict Resolution for planning and growth management if there are disagreements between the city and other governmental bodies. It suggests that the SW Florida Regional Planning Council has such authority to carry out conflict resolution. We are unaware of any situation where this has been employed. Further the SWFRPC is a largely dormant organization at this time. Why has this Policy been added?

- Policy IC-1.11 requires clarification regarding the boundaries of city of Naples and FAA authority on these matters. In addition, Action IC-1.11.1 is overly prescriptive in stating how often the Naples

Airport Authority and City Council should meet for various purposes. This should not be specified in the Comprehensive Plan but left to the NAA Board and Council to determine on an ongoing basis.

- Policy IC-2.1 regarding Aligning LOS Standards discusses "ensuring LOS consistency with county services provided to the city. It is our understanding that the only "services" provided to the city by the county is the Naples Library branch and the portions of county maintained roads (Goodlette-Frank, Golden Gate Parkway, and Pine Ridge Road) located within city limits. All other services are provided by the city itself.

- Objective IC-3 and subsequent Policies on Pages IC- 7-10 deals with Collier County School District issues. As a practical matter, it is our understanding that neither the PAB nor the city Planning Department has dealt with any school district issues in many years and perhaps decades. Is there need for these provisions to remain in the Comprehensive Plan?

- Objective IC-4 and related Policies address the need for coordination of Resiliency. However, it focuses on data development and coordination that suggests extensive new responsibilities for the City and its departments. Is this feasible and affordable? Should there be more considerations of staff and budget constraints before these requirements are part of the Comprehensive Plan?

- Finally, there is significant variation in this Element as to how the responsible party is identified in various Objectives and Policies. In some cases, it is "the City". In others, it is a specific department such as the "Planning Department". Thought should be given to creating consistency in this language.

Concurrency and Capital Improvements Element

- This is a poorly organized and written section of the Comp Plan.

- The only "actions" listed are on Page CCI-4, where four actions are listed. As in other sections of the plan, they should be removed or restated as policies.

- There are a number of polices where reviews are mandated within certain time periods. Unless these specific requirements are based on statute, they should be rewritten in general language and/or delegated to the discretion of the City Manager and Council.

- Objective CCI-2 (Page CCI-6) deals with LOS standards. In Policy CCI-2 the very specific LOS standards for each category (roads, drainage, water, etc). Is this appropriate? The Plan itself talks about annual updates of these standards (Policies CCi-2.2, 2.3 and 2.4. Should there be a reference to these standards rather than incorporating them in the Plan. Once they would change, the Plan would need to be amended.

- Objective CCI-3 Concurrency Management System deals with impacts of new development and redevelopment on LOS standards. Does this language create new or more burdensome processes for future development?

- Policy CCI-3.4 (Page CCI-10) — Update impact fee studies. Should recognize limitations on city's ability to levy impact (both type and extent) based on state statutes.

- Objective CCI-5 (Page CCI-11). Annual review of land use decisions ,etc relative to LOS standards. Doubtful that has ever been done. Why have it in the Plan?

Property Rights Element

- No comments or suggestion on this Element. The new language in the Introduction section of this Element tracks the language in the FCPA and appropriately strengthens this Element.

Naples Airport

Although the Naples Airport is not a separate Element of the Comprehensive Plan, it is addressed in multiple Elements of the proposed update (Vision Statement, Future Land Use, and Transportation). Therefore, we consolidated our comments and concerns regarding the airport:

- Our comprehensive plan should first and foremost support the safe and efficient operation of the Naples Airport and recognize the proper balance of local and federal authority. It has been clearly demonstrated over time that the Federal Aviation Administration (FAA) has regulatory preemption authority over aeronautical matters at the airport including land use matters involving aeronautical-related uses.

- The proposed plan does continue from the existing plan certain policies to ensure that development near the airport will not interfere with its safe operation and that residential and other noise-sensitive uses should not occur in the immediate vicinity (see Policies FLU-8.1 thru 8.7 and Policies T-7 thru T.9, T-11.1 thru T-11.3, and T-11.5. We support these policies.

- However, we oppose the inclusion of other proposed objectives and policies that would be inconsistent with federal law. These include Objective FLU-8 and Policies FLU-8.8 thru 8.11 as well as Policies T-11.4 and T-11.6.

- We also note that the Vision Element contains a statement regarding the Airport (Page V-7) that recognizes the importance of the airport to the local economy and for residents who use it, while recognizing the need to continue efforts to reduce noise impacts. This has been part of the Vision since it was first adopted. But the Introduction section of the FLU Element on page FLU-4 states that city should "ensure that the airport is operated in the best interests of the residents of the city. This is a change from the existing plan which states that the airport should be operated in the "best interests of the City". This language should be modified to be consistent with the broader and more balanced statement in the Vision.

Attachment B: Proposed Plan Provisions Inconsistent with Senate Bill 180

Naples 2045 Comprehensive Plan: Implementing the Vision

Part I: Provisions likely more Restrictive or Burdensome

Draft provision	Proposed language	Adopted Plan baseline	Practical effect	SB 180 assessment	Requested treatment
FLU-1.9.3	"The reduction in parking for new construction shall not result in a reduction of open space or an increase in lot coverage."	The adopted policy requires adequate parking and authorizes parking reductions. The quoted limitation is proposed new text.	Restricts how parking relief may be accommodated and may prevent site-design tradeoffs otherwise allowed.	Likely more restrictive	Delete or defer. If retained later, provide objective alternatives and a Live Local savings clause.
FLU-1.16	"Require Crime Prevention Through Environmental Design (CPTED) review for commercial development."	No comparable Citywide CPTED review requirement appears in the adopted Plan.	Adds a new review step and potentially new site-design criteria for commercial development.	Likely more burdensome	Convert to voluntary guidance or City technical assistance until the statutory restriction expires.
FLU-3.2	Applicants for new residential or mixed-use development "shall work with City of Naples Emergency Management staff to develop an Emergency Preparedness Plan," including shelter, evacuation, and other provisions deemed necessary.	No generally applicable applicant-prepared emergency plan requirement appears in the adopted Plan.	Adds a submission, interdepartmental review, and open-ended mitigation obligation.	Likely more burdensome	Delete or defer the mandate. Limit the policy to distributing existing emergency information.
FLU-4.3.1 and 4.3.2	"Expand the Code of Ordinance's protection of publicly owned trees to include protection of large canopy trees that are privately owned" and create Code amendments for heritage-tree protection, typically over 30 inches DBH.	Current policy supports public tree programs. Express protection of privately owned canopy and heritage trees is new.	Expands regulatory jurisdiction to private trees and may restrict removal, redevelopment, building area, or site access.	Likely more restrictive	Retain inventory, incentives, and education. Defer mandatory private-tree protection.
FLU-6.4 and 6.4.1	Identify and implement development-standard changes; for commercial and mixed use, evaluate "minimum yards and setbacks, maximum building areas," and required open, green, or pervious areas.	The current Plan contains compatibility policies but not this combined directive to tighten these dimensional standards.	Can reduce buildable area, floor area, intensity, lot coverage, and design flexibility.	Likely more restrictive	Remove "implement" and defer restrictive changes. Add an express section 166.04151 savings clause.
FLU-6.4.2	For multifamily development, evaluate "maximum lot coverage, minimum yards and setbacks, and heights" and consider required open, green, or pervious areas.	The adopted Plan does not contain this specific package of multifamily dimensional restrictions.	Directly targets lot coverage, height, setbacks, and open space; may conflict with Live Local protections.	Likely more restrictive	Delete or defer. Preserve density, FAR, height, lot-coverage, and administrative-approval rights under state law.
FLU-6.4.3	For single-family homes, evaluate requiring a percentage of each site as open, green, or pervious area and implementing landscaping requirements.	This Citywide single-family regulatory direction is new.	May reduce impervious or buildable area and add landscape installation and maintenance duties.	Likely more restrictive	Retain only as a neutral study without a commitment to adopt additional restrictions before legally permissible.

Draft provision	Proposed language	Adopted Plan baseline	Practical effect	SB 180 assessment	Requested treatment
R-4.4.1	Update the Code to modify design standards considering sea-level rise, water quality, resale disclosures, and the relationship between shoreline and fill policy for elevated property behind seawalls.	The adopted Plan does not contain this combined Code-update directive.	May burden shoreline construction, fill, seawalls, elevation, and real-property transactions.	Likely more restrictive	Separate data collection from regulation; confirm authority for resale disclosures; defer added restrictions.
R-4.9	Dune or mangrove alteration "shall be permitted only when supported by engineering and environmental analysis" showing no increased flood, surge, or erosion potential.	Current coastal protections do not state this precise universal "only when" evidentiary test in the carried-forward text.	Creates a new technical submission and an absolute approval standard.	Likely more restrictive and burdensome	Delete or defer; coordinate with state and federal permits and define any lawful local review narrowly.
PFWR-3.8	Apply stormwater best management practices to "all development," including "maximizing green space onsite and minimizing impervious surfaces."	The universal scope and optimization language are new or materially expanded.	"Maximize" and "minimize" have no measurable endpoint and may support discretionary denial or reduced site yield.	Likely more restrictive if used in review	Replace with objective standards and alternative compliance only after the SB 180 period.
PFWR-3.10	Ensure private development includes "maintenance plans for stormwater management lakes."	The adopted text addresses private-development water-quality and quantity features; the specific maintenance-plan requirement is proposed new language.	Adds a document, continuing maintenance duty, and potential enforcement condition.	Likely more burdensome	Confirm whether existing Code already requires the same plan. If not, defer or rely on existing permit requirements.
PROS-1.8	"Update the Code of Ordinances to require developers of multi-family, mixed use, and commercial projects to include more functional and accessible open spaces."	Existing policy addresses open space through review. The express Code-update requirement and broader direction are proposed revisions.	May increase required area or prescribe plaza, park, landscape, access, or design features.	Likely more restrictive	Consolidate with FLU-4.1.2 and FLU-6.4; defer added requirements and preserve Live Local entitlements.

The Part I provisions should not be transmitted or adopted as drafted. *They add new reviews, submissions, approval tests, or express commitments to tighten dimensional, landscaping, open-space, shoreline, stormwater, environmental, or design standards. Because the adopted Plan baseline does not contain the same requirements, residents contend that these amendments fall within section 28's prohibition.*

Part II: Regulatory Directives with Substantial Implementation Risk

Draft provision	Proposed language	Adopted Plan baseline	Practical effect	SB 180 assessment	Requested treatment
FLU-4.1.1	"Identify necessary Land Development Code updates to improve landscaping and resilience requirements" using Right Tree Right Place, Florida-Friendly landscaping, native shade, nature-based solutions, and floodable park space.	Existing policies encourage landscaping and conservation. The directive to strengthen Code requirements is new.	Predetermines regulatory amendments that may increase planting, design, or site-area requirements.	Implementation dependent but high risk	Retain the study only if it neutrally evaluates costs, alternatives, existing rights, and SB 180 compliance.

Draft provision	Proposed language	Adopted Plan baseline	Practical effect	SB 180 assessment	Requested treatment
FLU-4.1.2	"Evaluate Land Development Code changes to open space requirements to better align with the Future Land Use Designations."	The adopted Plan does not contain this specific directive to revise open-space requirements by future land-use category.	May increase required open space or reduce buildable area, density, intensity, or lot coverage.	Potentially more restrictive	State that the evaluation may not reduce existing lawful development rights during the restricted period.
FLU-5.3.1	Evaluate Code buffering standards and identify updates addressing "noise, lighting, privacy, odor, and similar nuisances."	The adopted Plan requires buffers and transitions. The specific directive to reassess and potentially increase standards is new.	May increase setbacks, buffer widths, walls, landscaping, or separation requirements.	Implementation dependent	Make the study neutral and state that it does not authorize additional development conditions.
FLU-6.1 and 6.1.1	Identify development-standard changes addressing "building heights, building massing, and open space" and update the Design Review Handbook with clearer massing, open-space, and pervious-surface guidance.	The adopted Plan supports design review, but these additional subjects and implementation direction are new.	May create new dimensional or discretionary approval criteria through the Code or Handbook.	Potentially more restrictive	Clarify that Handbook material is advisory unless separately enacted and cannot reduce existing entitlements.
FLU-6.2.1	Use a one-time analysis of recent development to "propose amendments to the Land Development Code or the Design Review Board Handbook" addressing character and design concerns.	No comparable mandatory post-adoption regulatory study appears in the adopted Plan.	Creates a defined pathway from public concerns to additional design restrictions.	Implementation dependent	Require objective data, alternatives, property-rights analysis, and a separate SB 180 finding before amendments proceed.
FLU-6.5 and 6.7	Identify neighborhood character elements for protection and study performance criteria to guide redevelopment of historically or architecturally significant properties.	The adopted Plan recognizes historic resources. The broader placekeeping and performance-criteria program is new.	Could restrict demolition, additions, architecture, redevelopment, or use of undesignated properties.	Implementation dependent	Define objective designation and notice procedures. Use voluntary incentives until any later standards are lawfully adopted.
FLU-6.7.6	"Consider development standards that encourage the inclusion of public art in public spaces and private development projects."	No comparable private-development public-art direction appears in the adopted Plan.	Could become a mandatory art, fee-in-lieu, or site-area requirement.	Potentially more burdensome	Limit to voluntary incentives or publicly funded projects during the restricted period.
FLU-7.1	"The City shall create and maintain a Neighborhood Planning Process" with boundaries, plan contents, and timeframes.	The adopted Plan does not establish this Citywide mandatory process in the same form.	The adopted Plan does not establish this Citywide mandatory process in the same form.	Not facially restrictive but implementation risk	State that neighborhood plans are advisory unless adopted through a separate lawful amendment or ordinance.
R-3.2 with Actions 3.2.1 and 3.2.2	Review and amend floodplain rules using vulnerability data; evaluate "additional freeboard requirements"; and revise fill and grading policies where necessary.	The Resiliency Element is new. These regulatory commitments are not in the adopted Plan.	May increase construction elevation, engineered fill, grading, drainage, and reconstruction requirements.	Potentially or likely more restrictive	Retain technical study, but defer new burdens; coordinate with the Florida Building Code and objective adopted data.
R-3.4	Review development standards addressing Florida-Friendly landscaping, tree retention, permeable pavement, bioswales, rain gardens, green roofs, and floodable open spaces.	No comparable consolidated private-development standard appears in the adopted Plan.	May require specific site-design techniques, reduce usable area, or increase construction and maintenance costs.	Implementation dependent but high risk	Use voluntary incentives and performance-based alternatives; do not require a particular technique.

Draft provision	Proposed language	Adopted Plan baseline	Practical effect	SB 180 assessment	Requested treatment
R-4.3	"Within three (3) years, the City shall review and revise its dune protection requirements if necessary."	The Resiliency Element and this timed revision commitment are new.	Could impose additional limits, setbacks, planting, access, or restoration requirements on coastal property.	Implementation dependent	Revise to require a neutral legal and technical evaluation before any regulatory amendment.
R-4.10 and 4.11	Implement nutrient-reduction measures through "land development regulation updates" and modify landscape and shoreline-canal vegetative requirements where appropriate.	The new Resiliency Element adds these specific regulatory directives.	May add planting, shoreline, maintenance, water-quality, or canal-edge requirements.	Implementation dependent	Keep studies and public projects; defer private-property mandates pending legal and technical review.
PFWR-1.12	Implement a Stormwater Ordinance and Standards Handbook designed to protect adjacent properties, function under future tidal conditions, and improve runoff quality.	The adopted Plan regulates stormwater. The future-tailwater and adjacent-property performance commitments are expanded.	May require larger systems, additional modeling, higher elevations, or reduced usable site area.	Potentially more restrictive	Use defined adopted data, reasonable design events, and alternative compliance; defer any net-new burden.
T-3.5.1	Explore limiting the number and separation distance of driveway access points from streets to private property.	No comparable specific Code-study directive appears in the adopted Plan.	May restrict access, require shared or cross-access, or change site circulation and developable area.	Implementation dependent	Retain safety study with site-specific exceptions; defer a more restrictive amendment.
Housing H-1.8	Explore a fair-share affordable housing ordinance requiring commercial and residential development to address affordable housing through impact fees, unit set-asides, land donation, or other alternatives.	The text appears among joint City and County policies. Its current operative status and whether it is new, moved, or retained require confirmation from the redline and adoption record.	If applied as a City mandate, it would add a fee, set-aside, land, or mitigation obligation.	Potentially more burdensome	Confirm status. Any City requirement must include incentives that fully offset developer costs under section 166.04151(4).
CCM natural resources classification	"Before development can be approved, an environmental assessment must be submitted with permit applications and associated materials required for review."	The adopted Plan protects natural resources, but the scope and new status of this submission requirement should be verified against the redline.	Adds an environmental report and potentially new approval findings for affected properties.	Likely more burdensome if new or expanded	Define mapped applicability, required contents, review standards, and avoidance of duplicative state or federal permitting.

The Part II provisions should be revised *so that each item authorizes only neutral data collection, education, voluntary incentives, or public capital planning during the restricted period. State expressly that the study, handbook, neighborhood plan, or action item is not an independent criterion for approving, conditioning, delaying, or denying development and does not authorize a more restrictive implementing regulation.*

Sources

- City of Naples, Naples 2045 Comprehensive Plan Implementing the Vision, Extended Public Review Draft Plan, July 2026.
- City of Naples, currently adopted Comprehensive Plan, updated through 2024, as reflected in the draft redline.
- Section 28, Chapter 2025-190, Laws of Florida, CS/CS/SB 180, especially subsections (1), (3)(a), and (3)(b).
- Federal Emergency Management Agency, designated-area records for DR-4828 and DR-4834 identifying Collier County.
- Sections 163.3161, 163.3177, 163.3194, 163.3202, 166.033, 166.04151, 252.422, and 70.001, Florida Statutes.

Mary Allen

Date sent: October 20, 2026

From: Mary Allen
To: Erica Martin
Subject: Feedback
Date: Tuesday, October 20, 2026 12:57:00 PM

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Hi,

As a resident of Naples for only 6 years, I have witnessed property's bought up and built on including Agricultural zoning rezoned for residential. We are being coined 'the new or next Miami' depending upon who you speak to.

It is sad to see "green wild" land disappear. The road expansion at Collier and Vanderbilt has a cement walkway but no trees to shade you from the burning sun. That is sad.

Allowing schools to be built (collier & Vanderbilt) without: 1/ parking for parents to pick up kids; 2/ back way to exit / enter the school increasing the flow of traffic is an example. The school moved two classes somewhere else.

It is distressing that parks are not integrated locally. Kids have to be driven to main parks.

Water is a problem for Lee county and can become a problem here.

Let's stop building on the land. Let's preserve more of the land for a walking path, a quiet area to sit, etc.

Thanks for listening.

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Frank Cerveny (Aqualane Shores resident)

Date sent: October 20, 2026

From: Frank Cerveny
To: Erica Martin
Subject: Naples 2045 Comprehensive Plan – Infrastructure Resilience Must Be the City"s First Priority
Date: Tuesday, October 20, 2026 3:16:24 PM

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Dear Erica,

Thank you for the opportunity to comment on the City's Comprehensive Plan update.

In my view, the single most important issue facing Naples is the adequacy and resilience of its underlying infrastructure, particularly its stormwater drainage systems. This is not simply a matter of protecting individual properties. It is fundamental to the safety of residents, the viability of local businesses, the preservation of property values and ultimately the long-term sustainability of Naples itself.

As a resident of Aqualane Shores and Chair of the Aqualane Shores Association's Resiliency Committee, I have witnessed firsthand the consequences of inadequate stormwater management. During the significant rainfall on October 7–8, flooding affected streets and private properties, including my own. These events raise serious questions about the capacity of existing drainage infrastructure, the effectiveness of backflow prevention measures and the City's ability to protect residents from increasingly frequent rainfall and tidal flooding events.

While the Comprehensive Plan appropriately addresses resilience, I believe the City must go further than broad policy commitments. Specifically, I would urge the City to:

1. Undertake a comprehensive, independent assessment of existing stormwater infrastructure, including drainage capacity, backflow prevention, pumping requirements and system performance under combined rainfall and tidal conditions.

2. Establish measurable drainage performance standards and publicly identify areas where existing infrastructure fails to meet them.

3. Prioritize infrastructure investment according to demonstrated flooding risks, threats to public safety and the vulnerability of existing homes and businesses.

4. Publish a funded, time-bound capital improvement program, with clear

accountability and regular reporting on progress.

5. Ensure that future development and redevelopment decisions explicitly consider the capacity of existing infrastructure and do not exacerbate flooding risks for neighboring properties.

I recognize that the draft Plan already contemplates several of these objectives. My concern is whether the commitments are sufficiently specific, adequately funded and subject to meaningful implementation deadlines.

Naples is an extraordinary community, but its long-term success cannot be taken for granted. We should not continue investing in beautification, redevelopment and growth without ensuring that the essential infrastructure supporting the City is capable of protecting what already exists.

I would strongly encourage the City Council to make infrastructure resilience its foremost long-term capital priority and ensure that the Comprehensive Plan establishes a credible, measurable framework for achieving it.

Thank you for considering these comments. I would appreciate confirmation that they will be included in the public record and considered as part of the final Plan.

Kind regards,

Frank Cerveny
Resident, Aqualane Shores
Chair, Resiliency Committee Aqualane Shores Association

Submitted in my personal capacity.

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Tom Jennings

Date sent: October 20, 2026

From: tfjennings10
To: Erica Martin
Cc: tfjennings10
Subject: Naples Comp Plan and the Naples Muni Airport
Date: Tuesday, October 20, 2026 2:49:44 PM

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Extreme importance should be assigned to the City of Naples regaining control of the NAA/NMA and whatever legal measures are required to accomplish that along with other state-threatened city powers.

Tom Jennings

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Anis Khalil

Date sent: October 20, 2026

From: Anis Khalil
To: Erica Martin
Subject: Comprehensive Plan Update / Input
Date: Tuesday, October 20, 2026 11:38:03 AM

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Hello Erica

I request that the City retain any and all elements of the plan that keep the character of the City as is (architecturally and otherwise) with heavy emphasis on natural preservation and ecological health of our environment.

Thank you
Anis Khalil
2064 Alamanda Dr 6
Naples FL 34102
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David Mason

Date sent: October 20, 2026

From: Dave
To: Erica Martin
Subject: Comments
Date: Tuesday, October 20, 2026 2:03:16 PM

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Thank you for circulating the proposed Vision Statement and definitions. I appreciate the work that has gone into clarifying these important terms.

I suggest adding language that recognizes peace and quiet as part of the residential and outdoor experience these definitions seek to protect. Quiet enjoyment of homes, parks, and natural areas is a meaningful part of what residents value about Naples.

With that in mind, I offer the following additions:

Green Jewel

"Protecting the Green Jewel also includes limiting noise and other environmental impacts from aircraft and airport operations so that Naples' natural areas, waterways, parks, and residential neighborhoods retain the peace and tranquility that contribute to the City's quality of life."

Character

"Character also includes the peace and quiet of neighborhoods and public spaces. Noise that regularly disrupts the enjoyment of homes, parks, and outdoor living diminishes the distinct character Naples seeks to preserve."

Small-town Charm

"Small-town charm depends in part on a peaceful residential and outdoor experience. Protecting the quiet, walkable, and welcoming atmosphere of Naples' neighborhoods and shopping districts helps preserve the small-town qualities residents value."

I recognize that residents hold differing views about the airport's future. These additions do not prescribe a particular solution; they establish peace and quiet as qualities the Comprehensive Plan should protect when evaluating future decisions.

Thank you for considering this feedback. I am happy to discuss further if helpful.

Sincerely,
David Mason

2820 Leeward Lane

Naples Fl 34103

Dave Mason
404.444.1707

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Ron Petrunoff

Date sent: October 20, 2026

From: ron petrunoff.net
To: Erica Martin
Subject: Comp Plan feedback
Date: Tuesday, October 20, 2026 3:07:04 PM

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Hi Erica,

Here are my thoughts on the comp plan:

In survey after survey, the residents of Naples continue to rank three items as most important for their quality of life

- Small town charm
- Ecological resiliency
- Less traffic/ congestion

How does the city convert these wants into actionable items to achieve these objectives. It seems the city can move toward all these objectives by focusing on one overarching theme, and that is to focus on less intensive development and resident desires. Not zero development, just one focused on residents' quality of life and not the tourist industry.

Approving a hotel on 3rd St whose plans were too big for the lot size and then granting variances on setback and parking reduced residents' quality of life.

Approving a move of part of the pumping station from within the footprint of the Four Seasons into the beach end of South Golf Drive reduced residents' quality of life.

Small town charm translates into limiting scale of development going forward. Move away from allowing developers to shoehorn hotels and condos into spaces that are too small for their design and then granting code variances to accommodate them.

Focus on limiting restaurant development that serves mostly tourists and then building parking garages to accommodate the tourist traffic.

Less intensive development should put less strain on the environment by limiting

demand for water, reducing pollution generated from tourist traffic and lessening wastewater treatment needs.

People move here for the beauty and livability, not to be in a Disney-like fishbowl overrun by tourists.

Other beautiful places like Paris, Barcelona and Venice are witnessing resident revolts as tourists swarm their cities and interfere with eesidents' ability to go about their daily lives.

Don't let Naples go down that path.

Ron Petrunoff

203 918 5357
ron@petrunoff.net
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Joanne Robinson

Date sent: October 20, 2026

From: Joanne Robinson
To: Erica Martin
Subject: Feedback on Naples Plan
Date: Tuesday, October 20, 2026 11:03:55 AM

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Good morning,

Thank you for sharing the Naples plan
Is it possible to request an improvement to the sidewalks in Old Naples?

Whilst it's definitely improved over the years, there are still a number of areas which don't have sidewalks and / or they just suddenly end which poses some safety risks.

Thank you again for your consideration.

Joanne Robinson
857-288-9991
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Ron Sills

Date sent: October 20, 2026

From: Ron Sills
To: Erica Martin
Subject: Input
Date: Tuesday, October 20, 2026 12:26:47 PM

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Pine ridge overpass above airport and Livingston. Golden gate overpass above Livingston
Sent from my iPhone
Ron Sills
Resills@gmail.com
970 390-8061

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James Bowens

Date sent: October 21, 2026

From: James Bowens
To: Erica Martin
Subject: My view
Date: Wednesday, October 21, 2026 12:02:45 PM

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Erica,
Thank you for sending this out and soliciting comments.

I would like to say that Naples and collier county have been a wonderful place to live and I am happy to see that so much thought and planning are going towards the future of Naples and collier county. I have been here for 30 years and most of the changes and improvements have been great. And by the way my compliments for the nice parks, beaches and government services. Also, the beach expansions have been great.

That said I just have a few basic comments regarding growth in Naples and Collier County.

1) Traffic - Obviously the road infrastructure has not kept up with the rapid growth. During season I have a difficult time even pulling out of my development onto Immokalee. And from 3 pm to 6pm it's almost impossible to travel anywhere, so unless I have to go out I just don't. Almost every road east, west, north and south at those times are a nightmare to travel on and you just have to be prepared to sit in your car if you go out at the wrong times of the day.

I believe there is planned expansion on rt 75 from my exit ,111, into Lee county, to at least to exit 133. In the morning going south and the afternoon going north is a disaster on the interstate and the roads leading up to them. There are accidents almost everyday and due to only 3 lanes traffic is usually at a standstill. This may be a state issue, but why wasn't an expansion done 10 years ago. The growth pattern was evident, but an expansion did not happen. Actually in my opinion we could use another lane north and south all the way to Tampa. We can't change the past, but we can learn from it and change the future.

2) Your report shows an increase of population in collier county of 91,000 by 2045 and a peak season population increase of approximately 100,000. I feel we need to SLOW down the growth!! I saw somewhere in the past that the tourism bureau wanted to advertise (maybe in Canada) about drawing people to Naples in the winter. We don't need to advertise Naples because we can't even stop the growth without advertising. Please stop this craziness. We don't need, nor should we strive to become another Miami, but on the west coast. We don't need more people living or visiting here. I am not against growth, but we are busting at the seems now and we need to slow down so we can methodically plan for new residents and guests. The current infrastructure (housing, hotels, parks, beaches, roads) can't handle it. I propose we build the infrastructure first before we consider more residents and guests.

Please slow down our growth as much as the government can by either not issuing new building permits or designating land to non commercial or non residential use. Ave Maria area is going to be a huge expansion that is already approved. Please, please stop any more growth so we can enjoy our beautiful city and county. I know most of our residents and guests would appreciate a well planned out city, with nice amenities and the ability to not be caught in a traffic jam or fight for a reservation to eat everyday.

Thank you for your willingness to listen.

Best regards,
James Bowens

Sent from my iPad
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Joe Migliara

Date sent: October 21, 2026

From:	Joe Migliara
To:	Erica Martin
Subject:	Addition to FLU Element. Protection of Residential Neighborhoods From Parking Garages
Date:	Wednesday, October 21, 2026 10:27:50 AM
Attachments:	Naples_2045_Residential_Garage_Protection_Amendment.docx

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Erica

I urge the Planning Department to incorporate the proposed parking garage amendment [Word doc attached below] into the Future Land Use Element of the Naples 2045 Comprehensive Plan.

The amendment addresses a fundamental land-use issue: **commercial parking demand should not justify the construction of high-capacity public parking garages within established residential neighborhoods.** Such facilities introduce traffic, congestion, noise, and visitor activity that can permanently alter neighborhood character and residential quality of life.

The amendment is firmly grounded in three longstanding City policies:

- **Naples Vision Statement:** Explicitly prioritizes the peace and comfort of residents when tourist and residential interests conflict.
- **Comprehensive Plan:** Calls for protecting established residential neighborhoods from incompatible development, traffic intrusion, and increased commercial intensity.
- **Fifth Avenue South Overlay District:** The founding 1994 ordinance, No. 94-7163, expressly sought to *"ensure that no additional traffic impact will be added to the surrounding residential neighborhoods."*

These principles should be translated into clear, enforceable Future Land Use policy rather than left as aspirational statements.

The renewed proposal for a high-capacity public garage at 4th Street and 4th Avenue South illustrates precisely why this amendment is necessary.

The Comprehensive Plan should not permit public investment in commercial or tourism infrastructure that would undermine the very residential neighborhoods it is intended to protect.

This amendment does not oppose downtown commerce or reasonable parking solutions. It establishes a necessary boundary: commercial parking needs must be accommodated without sacrificing established residential neighborhoods.

I respectfully request that Planning staff incorporate this protection into the revised Future Land Use Element and present it to PAB and Council as a clear implementation of the City's Vision and longstanding planning policies.

Best Regards,

Joe Migliara
jmig444@gmail.com

410 916 3330

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Naples 2045 — Proposed Future Land Use Policy

Citywide Protection of Single-Family and Low-Density Residential Neighborhoods from Commercial Parking Structures

Proposed Policy FLU-X.X

Objective. Implement the City of Naples Vision Statement's commitment to preserving small-town character, residential neighborhood integrity and quality of life through a uniform, enforceable citywide compatibility standard.

Policy. The City shall prohibit the construction, establishment, expansion or conversion of any freestanding or principal-use commercial, municipal, public or privately operated parking garage or multilevel parking structure on any parcel located within 500 feet of a parcel zoned RE, R1-15, R1-15A, R1-10, R1-7.5, R1-E, R3-6 or R3-12.

1. Citywide application. This restriction shall apply uniformly throughout the City, regardless of the neighborhood, ownership, financing, operator, intended users, asserted public benefit or commercial parking demand.

2. Measurement. The 500-foot separation shall be measured as the shortest horizontal distance between the nearest property boundaries of the proposed parking-structure parcel and any parcel in a listed protected district, including across public rights-of-way.

3. No discretionary override. No rezoning, planned development, conditional use, special exception, variance, development agreement or other discretionary approval shall authorize a structure inconsistent with this policy.

4. Residential accessory exception. Parking structures accessory to and serving exclusively otherwise permitted residential uses are excluded.

5. Implementation. The City shall adopt consistent Land Development Code and regulating-plan provisions. The policy shall apply prospectively upon lawful adoption, subject to vested rights and applicable state law.

Florida Statutory Basis — Land-Use Compatibility

- Fla. Stat. § 163.3177(1): Comprehensive plans must establish meaningful and predictable standards for land use and development.
- Fla. Stat. § 163.3177(6)(a)3.g: The Future Land Use Element must include criteria to "Provide for the compatibility of adjacent land uses."
- Fla. Stat. § 163.3202(2)(b): Land development regulations must regulate land uses and "ensure the compatibility of adjacent uses."
- Fla. Stat. § 163.3177(1)(f): Plan amendments must be based on relevant and appropriate data and analysis.

These statutes support compatibility regulation but do not prescribe a 500-foot distance. The City should document the planning rationale, map affected parcels, confirm district designations, and obtain City Attorney review of vested rights and current state-law restrictions before adoption.

Next Steps. Planning Department and City Attorney to prepare legally compliant implementing provisions and present this policy for a separate recorded vote.

Sources

Florida Legislature, § 163.3177: https://www.flsenate.gov/Laws/Statutes/2025/163.3177

Florida Legislature, § 163.3202: https://www.flsenate.gov/Laws/Statutes/2026/163.3202

City of Naples zoning map: https://www.naplesgov.com/media/79826

Collier Building Industry Association (CBIA)

Date sent: October 23, 2026

October 23, 2026

Via email: emartin@naplesgov.com

Erica Martin, Director of Planning
City of Naples
735 Eighth Street South
Naples, Florida 34102

Re: Naples 2045 Comprehensive Plan: CBIA public input on the Extended Public Review Draft

Dear Ms. Martin:

On behalf of the Collier Building Industry Association (CBIA) and its member companies, thank you for the opportunity to comment on Naples 2045. These comments follow extensive research and CBIA's review of the Planning Advisory Board's and City Council's discussions of the plan.

CBIA members design, build, remodel, and maintain the homes and businesses of Naples. They include:

- builders and remodelers
- architects and engineers
- pool, landscape, roofing, glass, and lighting contractors
- suppliers

They are the people who will turn this plan's policies into permits, plans, and construction. The residents and property owners they build for will live with the results.

A copy of this letter is being provided to Chair Coughlan and the members of the Planning Advisory Board, to Mayor Heitmann and the members of City Council, and to the City Manager. Please include it in the public input the Board will consider on November 13 and Council will consider in December, and in any staff summary of public input provided to the Board. Please also confirm that CBIA's comments to Council at the April 13, 2026 workshop are part of that input.

We send this letter as a complete statement of CBIA's position, so that it can be read on its own.

Summary of CBIA's position

CBIA does not oppose the City's Vision. We share the community's commitment to resilience, to a beautiful and walkable Naples, and to protecting the neighborhoods our members build in.

We do oppose transmittal of the plan in its current form. We ask for four things before its policies are carried into the Code of Ordinances:

- objective standards
- feasibility and cost testing
- legal screening
- clear sequencing

As drafted, the plan:

1. **Makes every policy a test for denying a project.** Many of those policies use words like "character," "scale," and "transition" without measurements (Section 3, items 1 and 2).
2. **Directs future code changes that would shrink what can be built on a lot and add new steps at permit.** None comes with a cost estimate (items 3 through 7).
3. **Removes long-standing provisions** that support redevelopment, remodeling, and predictable review (item 10).
4. **Has not been reviewed on the record against current state law.** Section 28 of Chapter 2025-190 (SB 180) bars more restrictive or burdensome comprehensive plan amendments before October 1, 2027, and the new compatibility law in s. 163.3194(7), F.S., takes effect January 1, 2027. Both dates fall before the City's planned adoption in August 2027 (Section 2).

We join the residents, associations, and organizations who have asked the City to slow down, define its terms, coordinate with Collier County, and obtain legal review before transmittal. Our specific requests are in Section 6, and Attachment B lists the current plan language we ask the City to keep.

1. Where the update stands

- **The update is elective.** The City completed its state-required, EAR-based amendments in 2024 (Ordinance 2024-15461, adopted September 18, 2024). On May 13, the Board was advised that the City is statutorily current and that this plan "consisted of elective changes." The next required update is not due until 2032. The October 7 memorandum to the Board describes Naples 2045 as "the elective changes to the City of Naples Comprehensive Plan."
- **The Board's May 13 action.** The Board voted 7-0 to recommend denial, having expressed the view that the draft should not be transmitted to the State at that time, to allow for additional public engagement. By a second motion, it asked that community groups and other governmental agencies be given the opportunity to review and comment. As described to Council on June 3, the Board's concerns "centered on a perceived lack of outreach to specific stakeholders, including the development community and individual homeowners' associations."
- **The schedule.** On June 15, Council unanimously approved an eight-month extension: public input to staff by October 23, the Board's review on November 13, and Council's in December. The October 7 memorandum to the Board anticipates a revised draft before the Board in February 2027 and first reading in March 2027. On June 3, staff advised Council that this schedule would result in final adoption in August 2027.
- **The text has not changed.** The October 7 memorandum states that the posted Extended Public Review Draft adds notations showing where language moved, and that "no changes were made to the content or language in the previously published draft." The concerns raised since March therefore all remain open.

Because the City is current with the State and no deadline applies, there is time to do this well.

2. The legal framework the plan must meet

We raise these points so they can be addressed on the record. We do not ask the City to take any position in pending litigation.

a. Meaningful and predictable standards, supported by data (s. 163.3177, F.S.)

Section 163.3177(1), Florida Statutes, provides that the plan "shall establish meaningful and predictable standards for the use and development of land and provide meaningful guidelines for the content of more detailed land development and use regulations." Section 163.3177(1)(f) requires that the plan's elements and amendments "be based upon relevant and appropriate data and an analysis by the local government."

Others have raised the same point:

- The Old Naples Association asked that the plan's goals, objectives, and policies be "clearly written, grounded in data and analysis" (February 17).

- Pavese Law Firm, writing for MHK Architecture, Neapolitan Enterprises, and The Ronto Group, questioned whether a survey and two workshops “rise to the level of relevant and appropriate data and analysis” (May 11).
- A Board member observed on October 14 that the draft lists data in an appendix but does not draw conclusions from it.

b. “Community character” and compatibility (s. 163.3194(7), F.S., effective January 1, 2027)

Chapter 2026-7, Laws of Florida (CS/CS/CS/HB 399), created s. 163.3194(7), Florida Statutes, effective January 1, 2027. It:

- requires comprehensive plans and land development regulations to “include factors for assessing the compatibility of allowable residential uses within a residential zoning district and future land use category”;
- provides that “References to ‘community character’ or ‘neighborhood feel’ are not sufficient, in and of themselves, to support a denial of an application on compatibility grounds.”

This takes effect seven months before the City’s planned adoption.

On October 14, a Board member noted that other cities use similar definitions of character “with no objection from the state.” That may have been true under prior law. It will not be true for a plan adopted after January 1, 2027. The draft’s new definitions of “community character,” “neighborhood character,” “scale,” “transition,” “quality of life,” and “quiet enjoyment” (Appendix C) list factors but no measurements. They should be reviewed against this statute before transmittal.

c. Section 28 of Chapter 2025-190, Laws of Florida (SB 180)

Section 28 of Chapter 2025-190 (SB 180) provides that each county listed in the federal disaster declarations for Hurricanes Debby, Helene, or Milton, and each municipality within one of those counties, may not “propose or adopt more restrictive or burdensome amendments to its comprehensive plan or land development regulations” before October 1, 2027. Collier County is listed in the Hurricane Milton declaration. The City’s planned adoption in about August 2027 falls inside that period.

CBIA joins the residents, associations, and organizations that have already asked the City to address this question:

Who	When	What they said
Conservancy of Southwest Florida	Spring 2026, to the Board (summarized at its April 8 meeting)	Recommended that the City “closely consult with your legal counsel about the most strategic time to transmit the updated City of Naples plan to the state”
HOA Coalition (seven associations)	March 10, to the Board	“If SB 180 is not repealed or modified in appropriate ways, the PAB and City

		Council will need to consider whether and how to proceed with this update."
Pavese Law Firm (for MHK Architecture, Neapolitan Enterprises, The Ronto Group)	May 11, to the Board	Identified specific draft policies it believes are more restrictive and recommended that the amendments not be adopted until after October 1, 2027
City Attorney	June 3, to Council	Advised that SB 180 "had created complications for the draft"

To our knowledge, no written legal review of the draft under Section 28 has yet been placed on the record. The 2026 bill that would have narrowed Section 28 (SB 840) did not pass.

We respectfully ask that the City Attorney's review of the draft under Section 28 and s. 163.3194(7) be placed on the public record before the Board's February 2027 review and before transmittal.

d. Impact fees (s. 163.31801, F.S.) and the Florida Building Code (ch. 553, F.S.)

- Any use of impact fees must meet the rational-nexus requirements of s. 163.31801 (see item 8 below).
- Any freeboard, elevation, glazing, or other construction standard that implements the plan should be adopted consistent with the Florida Building Code and the procedures of ch. 553, F.S., and the City's floodplain management ordinance.

3. What changes for those who design, build, and remodel in Naples

Words in quotation marks are the draft's, cited by policy number from the City Council Transmittal draft and the Extended Public Review Draft.

1. How consistency is decided (Future Land Use Goal, page FLU-5)

- **Today:** Applications "shall be evaluated in accordance with the following objective and policies." An application not in compliance "shall be found to be inconsistent with the Future Land Use Element unless otherwise provided for by a special overlay district or located within the Community Redevelopment Area."
- **The draft:** "Land development or redevelopment applications that are not in compliance with one or more of the policies shall be found to be inconsistent with the Comprehensive Plan." The sentence identifying which policies apply is removed, and so is the overlay and CRA exception.
- **The Introduction also deletes** the Chapter 163 consistency language and the definitions of "compatible with" and "furthers," the plan's only stated test for consistency.
- **Why it matters:** Read broadly, any policy in a plan of more than 300 pages could become a basis to find a project inconsistent. That includes policies phrased as

"should," "encourage," "consider," or "evaluate," and the subjective terms in item 2. Projects in special overlay districts, such as Fifth Avenue South, and in the CRA lose a stated exception.

- **We ask:** restore the overlay and CRA exception and the statutory consistency definitions. State that Vision statements and Appendix C planning concepts guide policy but are not independent grounds for a finding of inconsistency.

2. Character, definitions, and design review (Introduction, Vision, Appendix C, FLU-1.3, Objective FLU-6)

- The Vision's Initiatives continue to guide "the review of private development" (V-2). The draft adds that the plan is "implemented through the Code of Ordinances and other regulating documents" (I-4).
- **Appendix C adds adopted definitions** of community character, neighborhood character, scale, transition, quality of life, and quiet enjoyment.
  - Neighborhood character is described through factors including "building scale, massing, and architectural style," "lot size and development pattern," and "tree canopy, landscaping, and open space."
  - "Transition" lists "reduced building heights, increased setbacks… step-down building massing… reduced density or intensity."
  - No measurements are given.
- **Character language appears throughout.** Pavese's Exhibit B (May 11) lists more than 30 references to character, "small town charm," "Green Jewel," and related terms across the Introduction, Vision, Future Land Use, Public Facilities, and Parks elements.
- **Design review** changes from "Encourage" to "Ensure through a review process… guided by the Design Review Board Handbook as amended" (FLU-1.3). The policy title refers to multifamily and non-residential projects, but the body says "all new projects."
- Action FLU-6.2.1 calls for "a one-time analysis of recent development projects with opportunity for improvement regarding character and design," to propose amendments to the Code or the Handbook after adoption.
- **Other definitions reach further than intended** (Pavese, May 11):
  - "Development" includes any "material change in the… appearance of any structure or land." Read literally, that could include repainting a building or adding a pool.
  - "Floodplain" is "any land area susceptible to being inundated by water from any source." That departs from the hydrologic and SFWMD meaning.
  - The wetlands definition differs from the statewide methodology under ss. 373.019(1) and 373.421(1), F.S.
  - "Open space" is defined broadly.
- **Why it matters:**
  - Members cannot design to a standard that is not measured.

  - A Handbook “as amended” can change without a plan amendment or ordinance.
  - The HOA Coalition made the same point: terms such as “charm,” “character,” and “over-development” “mean different things to different people and are not reflected in code” (March 10). It asked for “more precise definitions of Green Jewel, Character, and Small-Town Charm” (May 19).
- **We ask:**
  - Replace or anchor each Appendix C planning-concept definition with measurable factors adopted by ordinance, consistent with s. 163.3194(7).
  - Conform “development,” “floodplain,” “wetlands,” and “open space” to their statutory and engineering meanings.
  - Limit FLU-1.3 to multifamily and non-residential projects, as its title says, with objective standards adopted by ordinance.
  - Include builders and design professionals in the FLU-6.2.1 review, and apply no resulting change to applications already in review.

3. Building envelopes, open space, and trees (FLU-4.1.2, FLU-4.3.1 and 4.3.2, FLU-6.4.1 to 6.4.4, PROS-1.8, H-3.5)

- **For multifamily:** evaluate “maximum lot coverage, minimum yards and setbacks, and heights to be in better alignment with the City’s Charter (three floors and building heights of 42 feet to the peak of the roof, measured from the first floor, FEMA elevation).”
- **For single-family homes:** evaluate opportunities to “require a certain percentage of a site for open space, green space, or pervious surface area” and to “implement landscaping requirements.” No percentage is stated, and the draft does not say whether it would exceed current requirements.
- **For commercial and mixed use:** evaluate “maximum building areas.”
- **Trees:** expand tree protection “to include protection of large canopy trees that are privately owned,” with heritage tree rules for trees “typically greater than 30 inches.” We appreciate the incentives in Action FLU-4.3.4: “reduced landscape buffer requirements, expedited approvals, or credits toward open space.”
- **Open space:** “Update the Code of Ordinances to require developers of multi-family, mixed use, and commercial projects to include more functional and accessible open spaces” (PROS-1.8). Today this applies through development review to office complexes and commercial centers.
- **Larger homes:** H-3.5 continues a study of “impacts of larger homes on smaller lots.” The former Vision Work Plan qualifiers, “while protecting property rights” and “while not inhibiting private property rights,” are not carried forward.
- **Why it matters:**
  - Together these could reduce buildable area or add site requirements on most lots in the City, including single-family infill, teardowns, and remodels.
  - As the Pavese letter notes, homeowners recovering from recent storms “need to know exactly what restrictions there will be on redevelopment.”

  - No cost or feasibility information accompanies any of these Actions.
- **We ask:**
  - For each Action, a stated measurable standard and a cost and feasibility analysis on representative lots (for example, 50-foot and 75-foot single-family lots), with industry review, before any implementing ordinance.
  - For single-family open space, credit for pervious pavers, pool decks, and stormwater features.
  - Restore “while protecting property rights.”

4. Stormwater design (PFWR-1.11, PFWR-1.12, Action PFWR-3.4.1, CCI-2.1, CCI-2.3)

- **Today:** “All new development, redevelopment or substantial improvement” is reviewed for stormwater systems “constructed to minimum standards.” The plan includes a table of credits for best management practices.
- **The draft:**
  - Systems “shall be designed to be functional for all tailwater conditions that may be encountered by events equal in frequency to the level of service or by SFWMD, whichever is more stringent.” This “may entail consideration of storm durations different than the current standard 5 yr-1 hour storm event.”
  - The “Minimum Tailwater Elevation is required as adopted in the Code of Ordinances and/or the most recent version of the Stormwater Ordinance Standards and/or Handbook, as amended” (PFWR-1.11.C; see also CCI-2.1). Applicants “may propose alternative tailwater elevations due to site-specific constraints,” which we appreciate.
  - Standards are to “function under future tidal conditions” (PFWR-1.12).
  - The credit table is removed. It covered roof drains to swales, pervious driveways, driveway trench drains, rain gardens, and pool and deck self-containment.
  - CCI-2.3 ties a level-of-service update to completion of the 2026 Watershed Master Plan.
- **What the Board heard on October 14:**
  - The City’s Critical Infrastructure Vision states the adopted stormwater level of service as “no crown-of-road flooding in the 5-year, 1-hour storm” and refers to modeling for the 25-year storm event.
  - Staff described moving the City’s level of service toward a substantially larger, longer design storm, and said the master plans for stormwater and other utilities will be embedded in the comprehensive plan on five-year cycles.
- **Why it matters:**
  - On infill lots, the design storm and tailwater elevation decide how much fill, storage, and pumping a project needs. This is likely the largest single cost the plan could add to a typical home.

  - The governing number would sit in a handbook that can change without a plan amendment.
  - The master plan it depends on is not yet complete.
  - The HOA Coalition notes that Council already "significantly increased stormwater retention requirements for new development" earlier this decade (March 10).
- **We ask:**
  - State whether a new design storm would apply to the City's public system, to private development, or both.
  - State any private-site design storm and tailwater elevation, with datum, in an adopted ordinance, not a handbook "as amended."
  - Apply no private-site change before the Stormwater Master Plan is adopted, and only with a cost analysis on representative lots.
  - Keep the existing credits (pools and patios as storage, roof drains, pervious pavement).
  - Where an SFWMD permit governs, treat compliance as satisfying the equivalent City criterion.

5. Resiliency (new element: R-3.2, R-3.2.1, R-3.2.2, Resiliency Action 4.4.1, R-4.3, R-4.9)

- **The draft:**
  - Amend the Floodplain Management Ordinance to increase opportunities for protection "through enhanced stormwater, freeboard, elevation standards, voluntary retrofit programs, and community outreach" (R-3.2).
  - "Evaluate the need for additional freeboard requirements" (R-3.2.1).
  - "Review, and where necessary revise, its fill and grading policies" (R-3.2.2).
  - Update the Code "to modify design standards considering future sea level rise, alternative strategies that enhance water quality, the effectiveness of disclosures to property owners upon resale and the relationship between shoreline and fill policy for properties that need additional elevation protected by an existing seawall" (Action 4.4.1).
  - Review and revise dune protection requirements "if necessary" within three years (R-4.3). In coastal high hazard areas, permit alteration of sand dunes or mangrove stands only with engineering and environmental analysis showing it "will not increase the potential for flood damage, storm surge impacts, or erosion" (R-4.9).
- **What we support in this element:**
  - permit fee discounts for resiliency upgrades such as impact windows and reinforced roofs (R-3.11)
  - incentives for FORTIFIED and other above-code standards, including building "local contractor support and capacity" (R-3.3)
  - transfer of development rights, clustering, and density bonuses (R-3.5)

  - retrofit financing (R-3.7 to R-3.10)

  We agree with the HOA Coalition that the City's resilience strategy should rest on public stormwater investment, beach renourishment, nature-based protection, and "regulatory and other incentives for residents and businesses to install flood protection devices and elevate their homes" (March 10).

- **Why it matters:** Freeboard, fill, and shoreline standards affect the cost and height of new and elevated homes on low-lying and waterfront lots. The draft states no numbers or datum, so the cost cannot yet be assessed. A resale disclosure requirement would reach every waterfront sale.
- **We ask:**
  - Set any freeboard, fill, or seawall standard by ordinance, measured from base flood elevation consistent with the Florida Building Code, stated in NAVD88, and applied to new construction and substantial improvements.
  - Ensure no such standard reduces buildable height.
  - Put the incentives in place ahead of new mandates.
  - Remove the resale disclosure concept, or limit it to information the City already publishes.

6. New steps at the permit stage (FLU-3.2, FLU-1.16, T-1.1, T-2.3, Action T-3.5.1, CCM-2.7)

- **Emergency preparedness (FLU-3.2):** "Applicants for new residential or mixed use development shall work with City of Naples Emergency Management staff to develop an Emergency Preparedness Plan to include provisions for storm shelter space, a plan for emergency evacuation, and other provisions that may be deemed appropriate and necessary." Today's plan applies a shelter requirement only to "new, DRI scale developments to the east of U.S. 41." As written, there is no size threshold.
- **CPTED (FLU-1.16):** "Require Crime Prevention Through Environmental Design (CPTED) review for commercial development," with no criteria.
- **Traffic:**
  - "Evaluate and regulate all proposed development projects in the City that increase traffic volumes" (T-1.1). Today this policy addresses "proposed street improvements."
  - Traffic impact analysis "per thresholds established in the Code of Ordinances" replaces "over one (1) acre" (T-2.3).
  - "Within the City's public rights-of-way, explore the feasibility of limiting the number of and separation distance between driveway access points from streets to private properties" (Action T-3.5.1).
- **Sea turtle lighting (CCM-2.7):** Review of lighting plans for properties "seaward of the Coastal Construction Control Line or visible from the beach." The added phrase is not defined in the plan. It is the same trigger used in the proposed amendment to Section 52-61 (Text Amendment 26-T5), which CBIA has addressed separately.

- **Why it matters:** Each adds a submittal or review step, and several have no size threshold, criteria, or review time.
- **We ask:**
  - Exempt single-family and duplex projects from FLU-3.2, restore a size threshold, and strike “other provisions that may be deemed appropriate.”
  - Make CPTED review voluntary or limited by project size, with published criteria.
  - Keep “over one (1) acre” as the minimum traffic study trigger, and exempt single-family lots of record.
  - Limit driveway restrictions to commercial and multifamily access on arterials.
  - Replace “visible from the beach” with a mapped, measurable boundary adopted by ordinance.

7. Housing (Housing Element; H-1.9)

- **The draft:** Objective H-1 lists “CITY POLICIES None.” H-1.9 would “explore the development of a fair share affordable housing ordinance that shall require commercial and residential developments to address the lack of affordable housing,” through options including an impact fee, a set-aside, or a land bank.
- **Others have raised this:**
  - Pavese notes that s. 163.3177, F.S., requires a housing element and implementation program, and that the draft “proposes to shift the burden for the City’s affordable housing to the County” (May 11).
  - A Board member observed on October 14 that workforce housing has little prominence in the plan.
- **Why it matters:** A linkage fee or mandatory set-aside raises the cost of every new home without the City incentives that make attainable housing possible.
- **We ask:**
  - Add City incentive policies: density bonuses, fee deferral, expedited permitting, and accessory dwelling units, building on H-2.4, H-2.5, and the guest-unit provisions we support.
  - Require a nexus study and the offsets of s. 166.04151(6), F.S., before any linkage fee or set-aside.

8. Funding (Concurrency and Capital Improvements Element, Introduction)

- **The draft:** adds “resiliency” to the costs that funding methods such as impact fees, user fees, and special assessments are meant “to accommodate” (“the costs of new development, redevelopment, and resiliency”).
- **It also removes:**
  - the requirement that plan proposals requiring public capital spending “carry related fiscal considerations, including estimated costs, priority ranking relative to other proposed capital expenditures, proposed funding sources, and estimated annual operating costs”;
  - a policy to evaluate impact fee credits for “smart building” standards.

- **Why it matters:** Resilience improvements serve the whole City, and the City is already funding them through a phased stormwater rate increase. Funding them through impact fees could place part of that cost on new construction alone. We appreciate that the draft keeps the rational-nexus standard (CCI-3.4) and that existing deficiencies are not charged to new development (CCI-1.8).
- **We ask:** confirm that impact fees will fund only capacity needed for new development, consistent with s. 163.31801, F.S. Restore the fiscal-considerations sentence and the smart building credit.

9. Coordination with Collier County (Action IC-1.2.1)

- **The draft:** "Develop joint planning agreements" with Collier County becomes "Explore opportunities to develop."
- **Others have raised this:**
  - The Board raised the lack of formal County coordination on May 13 and again on October 14.
  - The HOA Coalition and the Old Naples Association both asked for stronger regional coordination, especially on traffic and infrastructure.
- **Why it matters:** CBIA members work in both jurisdictions. Different stormwater design rules, right-of-way standards, permitting processes, and impact fee administration add cost and delay without public benefit.
- **We ask:** restore "Develop," with a target date. Include alignment of stormwater design, right-of-way standards, permitting, and impact fee administration with Collier County Growth Management. Place comprehensive plan coordination on the agenda of the December 1 joint meeting of City Council and the Board of County Commissioners.

10. Provisions removed without a stated replacement

Each of these supports redevelopment, remodeling, or predictable review. Attachment B quotes them in full from the adopted plan.

- The statement that the plan does not prohibit development orders that significantly reduce an existing legal nonconformity (Future Land Use, generalized land use description).
- "… this element gives special consideration to redevelopment and reuse of existing structures and property" (Future Land Use, introduction).
- "Provide an expedited review process" for LEED certified plans, now "Consider incentives" (Action FLU-1.19.3).
- "Amend the Code of Ordinances criteria for the issuance of a variance or expansion of nonconformity to allow for the renovation, rehabilitation and compatible additions to historic or architecturally significant structures," now "Consider criteria for planning petitions" (Action FLU-6.7.7).
- "(as defined by level of service standards)," which ties "adequate" public facilities to an objective measure (FLU-2.2).
- "Develop joint planning agreements" with Collier County (Action IC-1.2.1).

- The “over one (1) acre” traffic study threshold (T-2.3).
- The fiscal-considerations requirement and the smart building impact fee credit (Concurrency and Capital Improvements Element).

We ask: for each, either keep the current language or explain on the record why it was removed.

4. Proposals in the record that CBIA opposes

Several submissions ask the City to go further than the draft: to turn the plan’s general language into binding grounds for denial. We share the goal of clear, predictable rules. But these proposals would make the plan less predictable for property owners, not more, and some would raise the very legal questions described in Section 2. We oppose the following:

1. **Converting subjective terms into denial standards.** Proposals that development “shall not result in measurable degradation of neighborhood character,” measured by “scale, massing, lot coverage, traffic generation, noise, open space, tree canopy, privacy,” or that projects “shall not be approved” where they would “materially worsen” traffic, use the same undefined concepts discussed in item 2. Calling them “measurable” does not supply the measurement. After January 1, 2027, s. 163.3194(7), F.S., limits reliance on “community character” and “neighborhood feel” to deny an application. **CBIA supports measurable standards, adopted by ordinance with data and analysis. We oppose binding denial criteria built on undefined terms.**
2. **A fixed deadline to rewrite the Code.** A requirement to amend the Land Development Code “within 12 months of adoption” to conform to the plan would schedule implementing ordinances without the cost analysis, industry review, or legal screening this letter requests. It could also fall within the Section 28 period. **Implementing ordinances should follow those steps, not a calendar.**
3. **“No net increase” stormwater rules with no waivers for residential redevelopment, and “more protective local standards” that override regional permits.** Stormwater performance matters to every CBIA member and every neighbor. But a rule that allows no waiver for single-family redevelopment, combined with a City standard that always overrides SFWMD, leaves no path for constrained infill lots. That conflicts with the draft’s own recognition that applicants may need “alternative tailwater elevations due to site-specific constraints.” **We support item 4 above: stated design numbers, adopted by ordinance, with credits and a site-constraint path.**
4. **Moving use tables and use definitions into the plan, with all unlisted uses prohibited.** Clear use rules are reasonable. Placing a full use table in the plan, with “any use not expressly listed is prohibited,” would make routine uses and accessory uses require a plan amendment. Combined with item 1’s consistency change, that

would make ordinary permits harder to approve. **Use permissions belong in the Code, consistent with clear plan categories and measurable standards.**

5. **Building rules stricter than the State's coastal construction control line.** The plan already proposes a new "visible from the beach" lighting trigger (item 6). **Any construction standard landward or seaward of the CCCL beyond State requirements should come only with mapping, data, and cost analysis, and be adopted by ordinance.**

5. Where CBIA agrees with others in the record

CBIA is one voice among residents, associations, and organizations, and we share several of their requests:

- **HOA Coalition (Aqualane Shores, Coquina Sands, Gulf Shore Association of Condominiums, The Moorings, Park Shore, Port Royal, Royal Harbor, Sun Terrace):**
  - slow the process and allow meaningful engagement
  - make resilience the first priority
  - coordinate with Collier County
  - define "character," "small town charm," and "Green Jewel"
  - provide a document that maps each Future Land Use "Action" to the Land Development Code and shows whether the Code would change (May 19). **We ask that this map cover every element.**
- **Old Naples Association:** goals grounded in data and analysis; implementation and monitoring with clear performance indicators; and intergovernmental coordination.
- **Conservancy of Southwest Florida:** consult legal counsel on transmittal timing; use nature-based and incentive-based resilience strategies; and report progress against the plan's goals.
- **Pavese Law Firm (for MHK Architecture, Neapolitan Enterprises, The Ronto Group):** meaningful and predictable standards; definitions consistent with state law and engineering practice; clarity for homeowners who must redevelop; and legal review under Section 28.
- **Planning Advisory Board members (May 13 and October 14):** engagement with the development community and HOAs; County coordination; use of data; workforce housing; and specific proposed language. Attachment B responds to the Board's request for specific language.

We also support the positive provisions noted throughout this letter, including:

- the design ombudsman for private projects (FLU-6.3)
- height measured from the required FEMA elevation
- property rights considered for "development regulations" (PR-1)
- the Business Park designation for trades and storage uses

- guest units as secondary residential uses
- the tree and resiliency incentives
- the alternative tailwater path

6. Our requests

For the Board's November 13 review and Council's December discussion, CBIA respectfully asks:

1. **A working session** before the revised draft returns to the Board, with:
   - builders, architects, and engineers
   - the HOA Coalition and other associations
   - staff and the consultant

   If the Board holds comprehensive plan workshops, as one member proposed on October 14, please include the building and design professions. CBIA is forming a member task force of builders and design professionals and will participate.
2. **A table** mapping each Action to the Code section it would change, with the measurable standard proposed and an estimated cost to a typical project, before the Action is written into the plan.
3. **A plan-wide implementation safeguard.** Add to the Introduction: "Any amendment to the Code of Ordinances, Design Review Board Handbook, or Stormwater Handbook that implements an Action of this Plan shall be preceded by a published cost and feasibility analysis, review with affected property owners and industry stakeholders, and written legal review for consistency with state law, and shall not apply to applications found complete before its effective date."
4. **The current language in Attachment B kept,** or an explanation on the record of why each provision was removed.
5. **The definitions in Appendix C** anchored to measurable factors, and conformed to statutory and engineering meanings, consistent with s. 163.3194(7), F.S.
6. **The stormwater, resiliency, and permit-stage items** addressed as stated in Section 3.
7. **The City Attorney's written review** of the draft under Section 28 of Chapter 2025-190 and s. 163.3194(7), F.S., placed on the record before the Board's February 2027 review.
8. **Coordination with Collier County** placed on the December 1 joint meeting agenda.
9. **Correction** of the drafting items in Attachment A.
10. **No transmittal** until items 1, 2, 4, and 7 are complete. The City is current with its state requirements, so there is time to do this well.

CBIA welcomes the opportunity to meet with you and the consultant team before November 13, and asks that its task force of builders, architects, and engineers be included in the revision of the draft before it returns to the Board in February.

Thank you for your work on Naples 2045 and for considering our comments. Please include this letter in the record. We will continue to follow the Board's and Council's review.

Respectfully,

Tatiana Gust *Amelia Vasquez*

Tatiana Gust
CBIA 2026 President

Amelia Vasquez
Executive Officer

cc:

- Patrick Coughlan, Chair, and Members, Planning Advisory Board
- Mayor Teresa Heitmann and Members of City Council
- Gary Young, City Manager
- Matthew McConnell, City Attorney
- Patricia Rambosk, City Clerk

Attachment A: Drafting items to check

1. **Downtown Mixed Use density.** Page FLU-36 states “Maximum Site Density: Up to 30 units per acre” for the area bounded by 5th Avenue South, 8th Street, 7th Avenue North, and Goodlette-Frank Road. The Downtown Mixed Use designation page (FLU-67) lists only “Maximum Aggregate density: 12 units per acre for 118 acres, or 1,416 units.” Please reconcile the two so the designation page is not read as a reduction.
2. **High Density Residential Tower.** The intent statement (FLU-56) gives “a permitted density of up to 18 dwelling units per acre.” The Building Blocks for the same designation give “Up to twenty-five (25) dwelling units per acre, subject to Planned Development approvals and applicable developer agreements.”
3. **Affordable housing definitions (Appendix C).** “Affordable housing” is defined at incomes not exceeding “65 percent of the adjusted family median income,” while “affordable-workforce housing” uses tiers up to 120 percent of area median income. Please clarify which applies where.
4. **Future Land Use Goal (FLU-5).** Please identify which “policies” the consistency sentence refers to (see item 1).
5. **Tailwater cross-reference.** PFWR-1.11.A refers to a tailwater condition “in Policy 1-10” that no longer contains one.
6. **Sewer capacity.** The 10 MGD wastewater plant is described as serving a population of “100,000 +/- 10%” at 150 gallons per capita per day, the same population given for the 30 MGD water plant at 300 gallons per capita. At 150 gallons per capita, 10 MGD serves about 66,700, the figure in the current plan.
7. **Smaller items:**
   - Housing has no Policy H-1.7.
   - PFWR-7.6 cites “PROS-2.4” as a PFWR policy.
   - Objective PFWR-3 reads “Prove an efficient…”
   - T-1.1 reads “levels of serve.”
   - Some pages still carry a “KEY PRIORITY CHANGES DRAFT | FEBRUARY 2026” header.

Attachment B: Current plan language CBIA asks the City to keep

Quoted from the City of Naples Comprehensive Plan (updated 2024). Policy numbers are those of the adopted plan.

#	Current language (adopted plan)	Adopted location	What the draft does
1	“Applications for new development, redevelopment, and reuse shall be evaluated in accordance with the following objective and policies. Applications that are not in compliance with one or more of the policies shall be found to be inconsistent with the Future Land Use Element unless otherwise provided for by a special overlay district or located within the Community Redevelopment Area.”	Future Land Use Element, Goal	Removes the reference to “the following objective and policies,” extends the test to the whole Plan, and deletes the overlay and CRA exception (FLU-5)
2	“Consistency is determined based on whether the Plan is ‘compatible with’ and ‘furthers’ the State Comprehensive Plan and Regional Policy Plan. The term ‘compatible with’ means that the local plan is not in conflict with these plans. The term ‘furthers’ means to take action in the direction of realizing goals or policies of the State or Regional plan.”	Introduction	Deleted
3	“It is not the intention of this Comprehensive Plan to prohibit the issuance of development orders in which an existing legal nonconformity is significantly reduced in density or intensity of use, even though that reduction does not make it consistent with the Future Land Use Map.”	Future Land Use Element, land use descriptions	Deleted
4	“Thus, this element gives special consideration to redevelopment and reuse of existing structures and property.”	Future Land Use Element, introduction	Deleted
5	“Permit new development only in areas where adequate public	FLU Policy 2-2	Deletes “(as defined by level of service

	facilities (as defined by level of service standards), and access exists or will be provided prior to occupancy."		standards)" (FLU-2.2)
6	"Provide an expedited review process for LEED certified plans."	FLU Policy 1-13.9; Housing Policy 9-5	Reduced to "Consider incentives" (Action FLU-1.19.3)
7	"Amend the Code of Ordinances criteria for the issuance of a variance or expansion of nonconformity to allow for the renovation, rehabilitation and compatible additions to historic or architecturally significant structures."	FLU Policy 6-10	Reduced to "Consider criteria for planning petitions" (Action FLU-6.7.7)
8	"Develop joint planning agreements and land use studies between Collier County and the City of Naples…"	Intergovernmental Coordination Policy 1-6	Reduced to "Explore opportunities to develop" (Action IC-1.2.1)
9	"Require transportation and traffic impact analysis for all commercial and residential development proposals over one (1) acre."	Transportation Policy 5-5	Threshold replaced with "per thresholds established in the Code of Ordinances" (T-2.3)
10	"City Council requires that proposals contained in the Comprehensive Plan that require the expenditure of public funds for capital improvements will carry related fiscal considerations, including estimated costs, priority ranking relative to other proposed capital expenditures, proposed funding sources, and estimated annual operating costs."	Capital Improvements Element, Introduction	Deleted
11	"Evaluate a program which would provide impact fee credits or other tax preferences for the inclusion of 'smart building' standards in new development."	Capital Improvements Policy 2-6	Deleted
12	"Continue to pursue ordinances that relieve 'mega-house' impacts while	Vision Work Plan Policy 10-2	Study carried into H-3.5 without "while

	protecting property rights.”		protecting property rights”
	“Develop strategies to protect historic resources while not inhibiting private property rights.”	Vision Work Plan Objective 5	Not carried forward
14	Stormwater best management practice credits (roof drains to swales, pervious driveways, driveway trench drains, rain gardens, pool and deck self-containment)	Public Facilities and Water Resources Element	Credit table deleted

Attachment C: Public record reviewed

Alphabetical by submitter:

- City of Naples, Business Impact Estimate for the June 3, 2026 first reading
- City of Naples, Comprehensive Plan (updated 2024, Ordinance 2024-15461); City Council Transmittal Draft (June 2026); Extended Public Review Draft (October 2026)
- City of Naples, Critical Infrastructure Vision (PAB version, October 14, 2026)
- City of Naples, PAB memorandum (October 7, 2026), and PAB and Council minutes (April 13, May 13, June 3, June 15, 2026)
- City of Naples, Planning Advisory Board meeting of October 14, 2026 (video recording; minutes pending approval)
- Collier Building Industry Association, comments to City Council, April 13, 2026 workshop
- Conservancy of Southwest Florida, comments to the PAB (spring 2026; summarized at the Board’s April 8, 2026 meeting)
- Florida Statutes and Laws of Florida cited herein: s. 163.3177, s. 163.3194(7) (Chapter 2026-7), s. 163.31801, s. 166.04151, ch. 553, ss. 373.019 and 373.421, and Chapter 2025-190, Section 28
- Gregory B. Myers, email to Mayor and Council (May 19, 2026)
- HOA Coalition, letters of March 10 (PAB), April 13 (Council), and May 19, 2026 (City Manager)
- Joe Migliara, “Recommended Revisions to the Naples 2045 Comprehensive Plan” (April 6, 2026)
- Naples Airport Authority, letters of January 15 and May 12, 2026
- Old Naples Association, letter to Council (February 17, 2026)
- Pavese Law Firm (Neale Montgomery), letter to the PAB for MHK Architecture, Neapolitan Enterprises, and The Ronto Group, with Exhibits A and B (May 11, 2026)