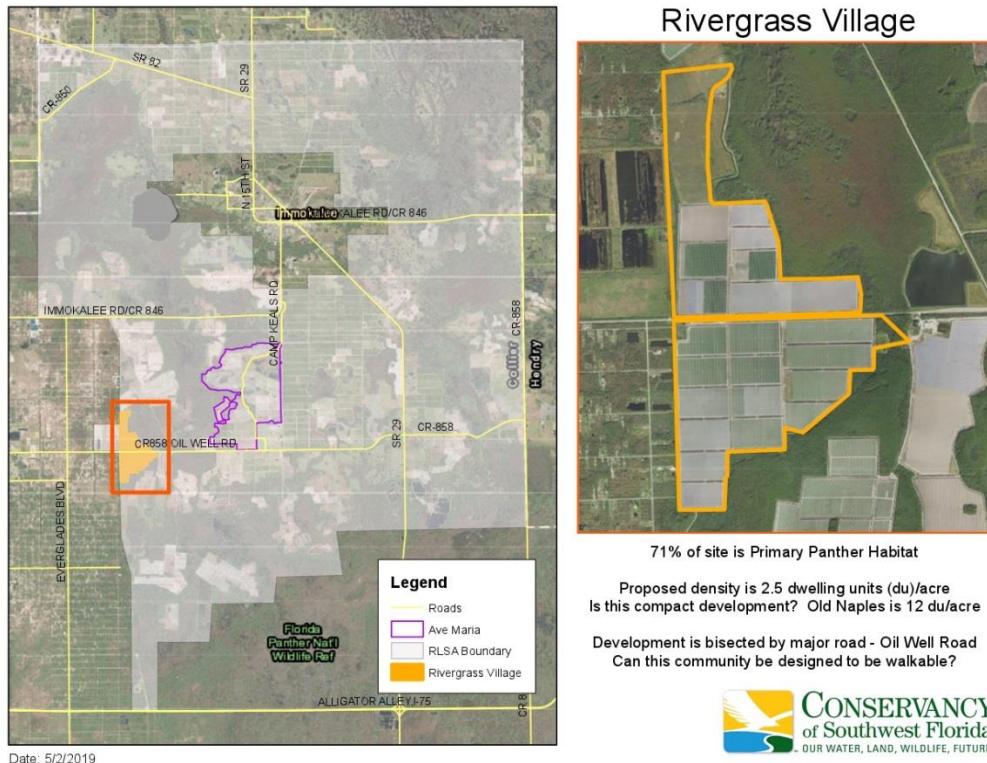




Rivergrass Village: A model for responsible land development or a project that disregards smart growth?

At the end of 2018 Collier Enterprises withdrew their application to build the Town of Rural Lands West. Rural Lands West would have been a sprawling town spanning six miles with mostly single-family neighborhoods surrounding 54 holes of golf, hardly a walkable design per the county's requirements. Also, the development would have consumed over 3,000 acres of primary habitat for the endangered Florida panther that scientists consider essential for the species' survival. Rural Lands West was a smaller rendition of a previously proposed town by the same applicant, called the Town of Big Cypress, that would have also resulted in severe environmental impacts to listed species. Thus, when Collier Enterprises replaced Rural Lands West with a proposal for an even smaller development, called Rivergrass Village (Figure 1), the Conservancy was hopeful. We were hopeful that the applicant would finally design a new development plan that would abide by the goals of the Rural Lands Stewardship Area (RLSA) program, which include the requirements of avoiding sprawl and directing development away from listed species' habitat. However, upon review of Rivergrass' plans, we were greatly disappointed to discover that, although scaled-down, the design of the project still exemplifies traits of sprawl and the location of the site would still result in severe impacts to the Florida panther. Furthermore, the plan would jeopardize the safety of pedestrians and bicyclists who live in the northern half of the development as they attempt to cross a six-lane arterial freight road to get to the Village Center to buy groceries, shop, or work.

Figure 1: Locational map of Rivergrass Village.
Rural Lands Stewardship Area (RLSA) is outlined in white.



If Collier Enterprises receives the necessary permits, Rivergrass Village would be the second Stewardship Receiving Area (SRA) or development within the RLSA, after Ave Maria. The RLSA is a 300 square mile planning area east of Golden Gate Estates known for its ecologically important lands and vast agricultural fields. The area is also home to a multitude of unique species. Many are listed as federally threatened or endangered, including the Florida panther.

New towns and villages built within the RLSA must meet the three goals of the planning overlay, which are to: (1) protect agriculture; (2) direct incompatible uses away from wetlands and listed species habitat; and (3) discourage sprawl by using innovative planning techniques. However, the reality of the proposed village is the antithesis of sustainable planning, environmental stewardship, and the three goals of the RLSA.

A summary of important information regarding Rivergrass Village is provided below. After the summary is a list of the Conservancy's concerns of the proposed village and our solutions to improve the project to better protect natural resources and implement sustainable development practices (smart growth).

Rivergrass Village - SRA Application Summary	
LOCATION	East of Golden Gate Estates, bisected by Oil Well Road, within the RLSA Overlay planning area.
APPLICANT	Collier Land Holdings (Collier Enterprises)
STATUS OF SRA APPLICATION (SRA = Stewardship Receiving Area. In this case the SRA is for a new village.)	Collier County Planning Commission hearing is scheduled for September 5, 2019
SIZE OF RIVEGRASS VILLAGE (SRA) (Figure 1)	1,000 acres (2.5 miles long, project is likely phase 1 of a much larger development project)
NUMBER OF NEW HOMES PROPOSED ¹	2,500 Homes (90% single family; 10% multi-family)
SQUARE FEET OF NON-RESIDENTIAL DEVELOPMENT & OTHER USES ²	Between 62,500-80,000 square feet of retail and office 25,000 square feet of civic, government and institutional uses. (Approx. 20 acres total for mixed-use center)
AVG. DWELLING UNITS (DU) PER ACRE	2.50 Residential DU per gross acre
GOLF COURSES	18 holes ³
PROJECTED POPULATION ⁴	4,269 (permanent residents)
CONSTRUCTION TIME FRAME ⁵	Construction is anticipated to begin mid-2020

Conservancy's Concerns of Rivergrass Village

CONCERN 1: Rivergrass Village would jeopardize the survival of the endangered Florida panther.

Over 70% of the proposed site for Rivergrass Village is within Primary Zone Panther habitat and over 34% of the project would impact Adult Breeding Habitat (Figures 2 & 3). Research suggests that all Primary Zone Panther habitat and Adult Breeding Habitat must be maintained as the habitats are essential for the survival and recovery of the species.⁶

¹ Submittal 3 to Collier County - Rivergrass Village SRA Project Narrative and Statement of Compliance (with SRA Design Criteria)

² *Ibid.*

³ *Ibid.*

⁴ Collier County Growth Management Department, Zoning Division. Consistency Review Memorandum, dated July 9, 2019.

⁵ Rivergrass Village SRA Neighborhood Information Meeting, June 6, 2019 at Collier County UF/IFAS Extension -14700 Immokalee Road.

⁶ Kautz, et al. (2006) How much is enough? Landscape-scale conservation for the Florida panther. *Biological Conservation* 130, p. 118-133; and Frakes RA, Beldon RC, Wood BE, James FE. (2015). Landscape Analysis of Adult Florida Panther Habitat. *PLoS ONE*, 10(7).

Figure 2 Rivergrass - Panther Zones

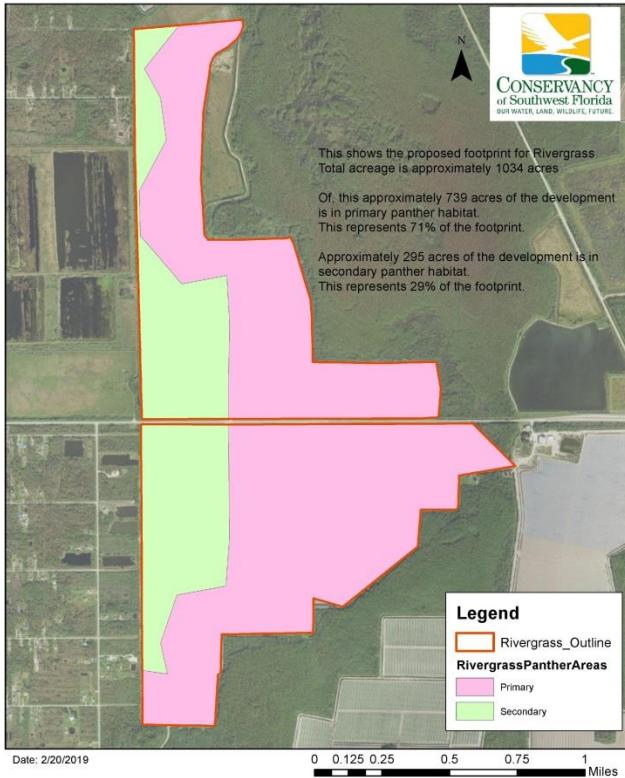
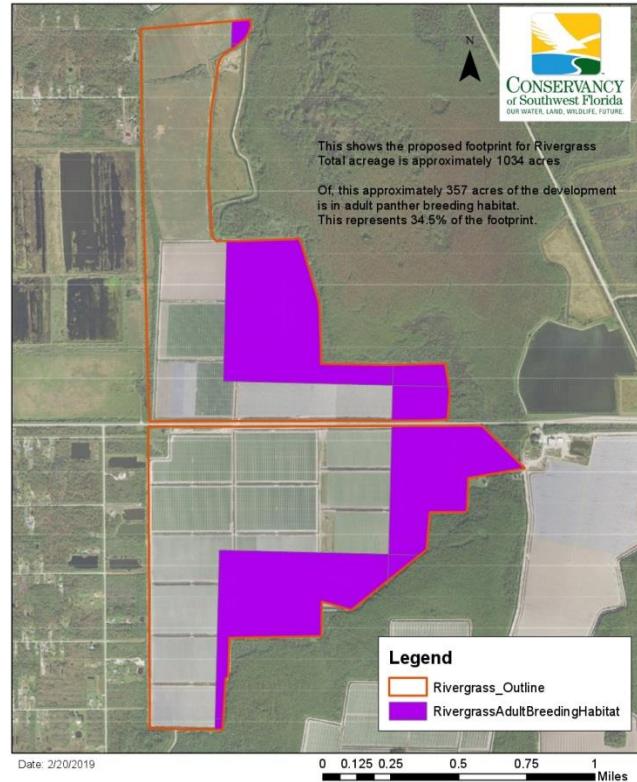


Figure 3 Rivergrass - Adult Breeding Habitat



SOLUTION: Rivergrass' development footprint (Figure 4) could be moved north of the current site where Collier Enterprises owns other parcels in the Secondary Zone panther habitat, outside of Primary Zone habitat and Adult Breeding habitats. The alternative development footprint (Figure 5) would provide far greater protections for the Florida panther. Although the alternative site is slightly smaller, by about 100 acres, the applicant could still build the same number of homes or more. As currently planned, the village averages only 2.5 dwelling units per acre. The average density could easily be increased to four units per acre per the program. If so, the applicant would increase the total dwelling units from 2,500 to 3,600 homes and sell approximately 1,100 more homes.

CONCERN 2: The design of Rivergrass Village is dangerous for pedestrians and bicyclists

Plans for Rivergrass show that the village would be bisected by Oil Well Road, a 55 mph freight-arterial road. The Village Center would be located along the south side of Oil Well Road (Figure 4). Currently 800 trucks a day travel through Oil Well Road, carrying petroleum, coal, mining materials, agricultural products, and Arthrex medical products. Collier County even has plans to widen the road to six lanes. Not only is it completely irresponsible to plan a village around a six-lane freight distribution route as it poses extreme danger to pedestrians and bicyclists, but the design contradicts several RLSA policies requiring that SRAs are designed to facilitate safe travel for pedestrians and bicyclists.

SOLUTION: In order to encourage safe pedestrian and bicycle circulation, per the RLSA requirements, Rivergrass must be completely redesigned so that the Village Center is not bisected by Oil Well Road *or* there should be two of the same sized mixed-use village centers servicing both halves of the development.

Figure 4: Concept Plan for Rivergrass Village

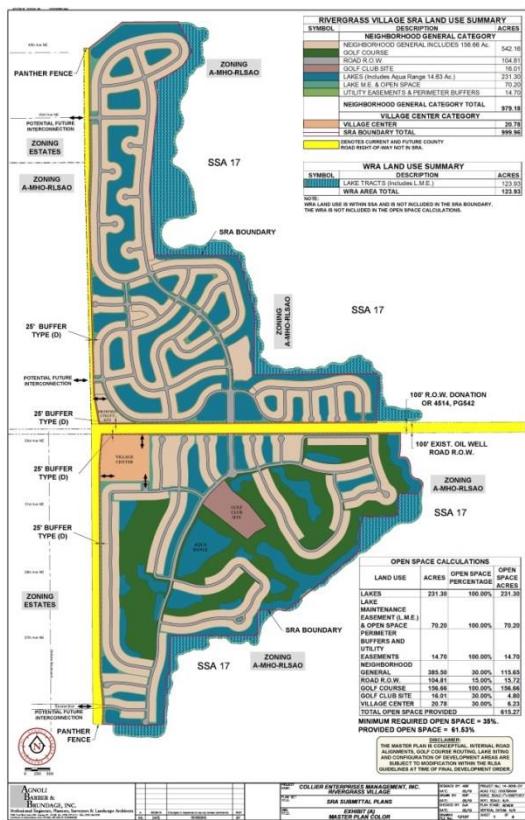
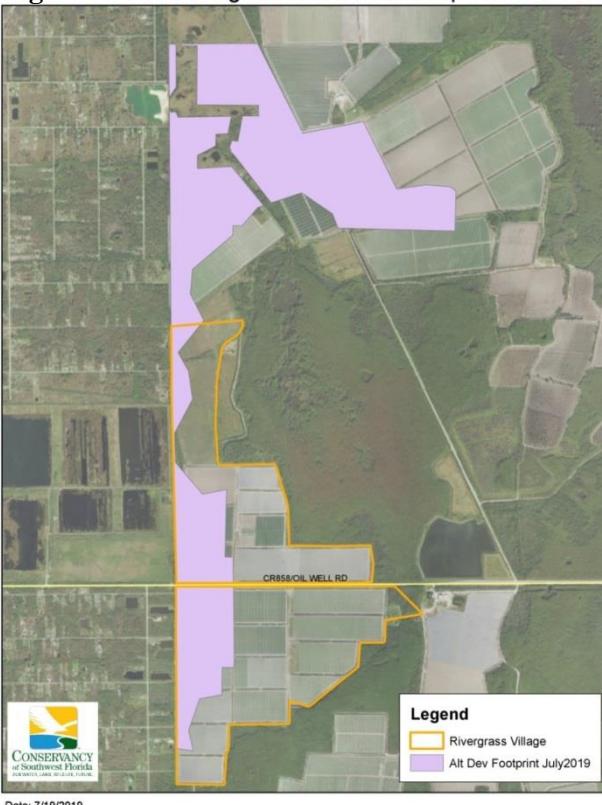


Figure 5 Rivergrass Alternative Footprint - 900 acres



CONCERN: Rivergrass' plan fails to curb sprawl and is not walkable

One of the main objectives of the RLSA program is to condense density onto a smaller footprint by creating mixed-use compact walkable communities, as an alternative to low-density single use development. However, most of Rivergrass would consist of low-density single-family neighborhoods dependent on travel by automobile, all typical traits of sprawl.

SOLUTION: Rivergrass' design must be totally restructured to achieve the following: (1) an interconnected street system without cul-de-sacs; (2) a higher concentration of multi-family homes within a $\frac{1}{4}$ mile walking distance to the Village Center; (3) a gradient of densities, where the highest densities are near the Village Center and the densities gradually reduce toward the neighborhood edge; and (4) increase the percentage of multi-family homes from only 10% to the county average of 45%. In addition, the deviations requested by applicant facilitate sprawl and should be denied.

Conclusion

We need your help to get the word out that enough is enough! Just because Rivergrass Village is smaller than both Rural Lands West and Town of Big Cypress does not mean that Collier Enterprises is offering a plan that protects natural resources, prevents sprawl, and is pedestrian-oriented. Rivergrass does not adhere to the goals of the Rural Lands Stewardship Overlay. Please make your voice heard that you want to see truly sustainable development in the RLSA, development that does not impact habitat of endangered species and development that is true smart growth. Collier County is accepting comments regarding the project now. The first public hearing to the Collier County Planning Commission is scheduled for September 5, 2019.

To find out more : Conservancy.org/Rivergrass or contact April Olson at AprilO@Conservancy.org / 239-262-0304, ext. 250.

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