May 27, 2011

Ms. Lauren P. Milligan  
Department of Environmental Protection Florida State Clearinghouse  
3900 Commonwealth Boulevard  
M.S. 47  
Tallahassee, Florida 32399-3000


Dear Ms. Milligan:

The staff of the Southwest Florida Regional Planning Council reviews various proposals, Notifications of Intent, Pre-applications, permit applications, and Environmental Impact Statements for compliance with regional goals, objectives, and policies, as determined by the Strategic Regional Policy Plan. The staff reviews such items in accordance with the Florida Intergovernmental Coordination and Review Process (Chapter 291-5, F.A.C.), and adopted regional clearinghouse procedures.

These designations determine Council staff procedure in regards to the reviewed project. The four designations are:

- **Less Than Regionally Significant and Consistent**- No further review of the project can be expected from Council.

- **Less Than Regionally Significant and Inconsistent**- Council does not find the project of regional importance, but will note certain concerns as part of its continued monitoring for cumulative impact within the noted goal area.

- **Regionally Significant and Consistent**- Project is of regional importance, and appears to be consistent with Regional goals, objectives, and policies.

- **Regionally Significant and Inconsistent**- Project is of regional importance and does not appear to be consistent with Regional goals, objectives, and policies. Council will oppose the project as submitted, but is willing to participate in any efforts to modify the project to mitigate the concerns.
The Florida Gulf Coast University (FGCU) Campus Master Planning process is part of the larger Strategic Planning that takes place at the direction of Florida’s Board of Governors. Florida Gulf Coast University’s Master Plan addresses Urban Design, Land Use, Recreation and Open Space, and Academic and Support Facilities, among many other elements of long range planning. Currently, FGCU is in the process of updating its Master Plan.

FGCU’s Board of Trustees approved a strategic plan for the university in January 2005. The plan covered the years 2005-2010 and has served us well as a roadmap to our future. As we near the end of 2009, it is time to update our strategic plan for another five years. Toward that end, the Planning and Budget Council has established a strategic planning process that will lead to an updated strategic plan by June 2010.

The Southwest Florida Regional Planning Council (SWFRPC) has reviewed the 2010 Draft Campus Master Plan for the Florida Gulf Coast University (FGCU) and has the following comments. Our comments are basically grouped in five areas; urban design, land use, transportation, conservation and landscape design guidelines.

**URBAN DESIGN ELEMENT**

1. We recommend that FGCU host a design Charette geared to the students of FGCU, with participation of the faculty and staff to examine both the main campus and its relationship to other FGCU properties. It is important in any design process to ask the users what is working and what is not working in current design to identify what is worth replicating and what needs to be done differently.

2. We recommend an increased efficiency in the use of building footprints. For example, the parking garages could have commercial space, classroom space and office space as external liner uses built in a shell around the parking building/lot similar to what has been done successfully in downtown Fort Myers and downtown Punta Gorda.

3. There needs to be an interior improvement in the transportation between the satellite parking garages/lots and other campus uses so that a walking user does not need to traverse non-side walked delivery zones, driveways, construction sites, and cross open unprotected spaces during storms, heat, and the dark of night.

4. There needs to be an improvement in the mixed-use characteristics of the campus with increased student-oriented service businesses such as cleaners, sundries, recreational supplies, post office and delivery businesses.
5. Goal 105: Add requirement to maximize campus self-sufficiency. Include also under Goal 401
6. Objective 301.5: Need to be more proactive, rather than just review or coordinate with surrounding University Community development.
7. There needs to be an added policy requiring campus community and University Community Charette planning exercises when land use changes are being considered.
8. Objective 30 1.7 and Goal 105: Energy Efficiency and Sustainability: Add requirements to reduce Vehicle Miles Travelled (VMT) through land use planning, transit, and self-sufficiency.

**LAND USE ELEMENT**

1. We strongly recommend implementing low impact development (LID) techniques, Smart Growth principles, and strong water conservation. We recommend the Sarasota County's LID manual as one of the best in the country, including both engineering and architectural details as part of the manual with all aspects of LID incorporated in the manual.
2. We recommend setting impervious surface thresholds to force thoughtful use of installing impervious surface. A maximum of 15% is a basic standard for Florida to protect both hydrologic and water quality resources for the Estero watershed.
3. We recommend that positive conservation uses, such as solar panels, be installed on existing impervious surfaces, perhaps as shade and cover features in parking areas and over walking paths; rather than utilize new vegetation clearing and installing new impervious surfaces to mount the solar panels.
4. Goal 401: Do not make this deletion “Develop future land uses on the University campus in a manner that is space and function efficient and considers the University’s future academic needs; conserves natural, historic and archaeological resources; and is coordinated with future land uses in the host community”. The proposed removal of the language “conserves natural, historic and archaeological resources; and is coordinated with future land uses in the host community” implies that FGCU does not intend to protect these resources or cooperate with the community it serves. The existing language should remain or be improved to focus on protection of valuable natural resources.
5. Objective 40 1.1: The language implies that the FCGU will not comply with local environmental regulations and intends to dispute with the local government on these issues. Either the local government should be added or the distinct addition be removed. Rather than aspire to only be consistent with permits and regulations, FCGU should aspire to be more protective of resources and look for restoration opportunities as befits the University’s goals and mission statement.
6. **Objective 401.2 and the included following policies shows the following deletions**

   **Objective 401.2 — Protection of Historic and Archaeological Resources**

   Ensure that future campus development is consistent with regulations governing development in areas where historic and/or archaeological resources may be present. **Policy 401.2.1** Maintain an information file documenting, in graphic and narrative form, those portions of the University campus identified by county and/or state agencies as being possible locations of historic/archaeological resources. Include documentation of state regulations governing development in areas where such resources may be present. **Policy 401.2.2** Undertake site investigations prior to development to determine whether historic/archaeological resources are present, as required by state regulations. Document the findings as part of the overall information database to be maintained as part of the land management review process. **Policy 401.2.3** Undertake mitigation actions as required by state regulations in the event historic and archaeological resources are found to be present. Objective 401.2 and the included following policies should not be deleted. Their removal of this would indicate insensitivity to historic, archaeological, and cultural resources and the protection and study of these values. Even if no resources have been found so far that is no guarantee that such resources will not be encountered on any of the many holdings of FGCU including as yet un-acquired sites.

7. **Goal 402: There is a need for proactive planning for transit to facilities and services.**

**TRANSPORTATION ELEMENT**

1. **We recommend more efficient use of available parking, including off-site parking.** For example, the Gulf Coast Town Center and Miromar Lakes has a surfeit of commercial parking, and that parking is usually available during the work days and less available on the weekends. So that parking can be used more efficiently with low headway jitneys that tie that to the campus. Similar to long-term parking at the airport. And also more comfortable uses of alternative modes of transportation within the campus, installing covered walkways so that walking on the hot and/or wet campus is more comfortable.

2. **Consistency with Lee County Comprehensive Plan (Lee Plan)**

   - **Background:** The Lee County Evaluation and Appraisal Review, adopted March 1, 2011, focused on five issues that were identified as primary drivers of needed changes to the land use plan. The relevant sections of the plan were to: Take Care of Lee County (e.g., quality of life and economic development) and Connect People to Places (reinforce complete streets and integrate all aspects of transportation form and function).
TO: Ms. Lauren P. Milligan  
DATE: May 27, 2011  
PAGE: 5  
RE: IC&R: 2011-18

- **Recommendation**: The FGCU Campus Master Plan should be consistent with this focus and provide incentives and disincentives for connectivity and alternative transportation. Universities have more leverage and tools than any other employer or organization to make this happen. FGCU needs to LEAD (like many other universities around the country have done, with great success—Davis, CA; Boulder, CO; etc.)

3. Consistency with MPO countywide bike/ped master plan  
   - **Background**: The MPO LRTP, to be adopted on May 20th, will include adoption of a major countywide bike/ped master plan which includes 3 demonstration projects, one of which is bike lanes and signage on a University Loop, that will promote bicycling by students and others both to university and to errands—shopping, errands, social life—off campus. Critical that FGCU be a partner in this effort.  
   - **Recommendation**: The FGCU Master Plan should connect to these facilities (University Loop) by installing bike lanes on existing campus entrances.  
   - Not to do so sends a strong signal of disconnect from county plans and a terrible message to students and community re: not being bike-friendly campus.  
   - Bike lanes can be put in easily on FGCU Blvd. through a road diet, i.e., narrowing the car lanes by restriping to add bike lanes.  
   - **Recommendation**: Apply for a League of American Bicyclists Bicycle Friendly Campus. This would enhance the status of FGCU as a sustainable university and provide important tools for marketing a sustainable, livable, and walkable community to potential students.  
   - **Recommendation**: Address Safety Issues. Between 2005 and 2010 the number of accidents on campus increased from 27 to 94—a 348% increase. As the ADT (Average Daily Trips) of students and campus users increases, safety for all users (bicyclists, pedestrians, skateboarders, and automobiles) needs to be addressed. Improving safety is an important part of the MPO bike/ped master plan. Strategies to increase safety should be addressed in the GOPs, particularly in the Transportation Element.

4. Transportation Demand Management Strategies  
   - **Recommendations**: Transportation demand management strategies should be better integrated across the Master Plan. The data and analysis and goals, objectives, and policies should reflect an integrated approach to affecting the incentives and disincentives to use of the single-occupancy vehicle. Specifically:  
     - Use the opportunity presented by congestion at sporting events as a disincentive to travel to and around campus by car.  
     - Provide incentives for car pooling (including park and ride lots) and public transit (internal and external to campus).
TO: Ms. Lauren P. Milligan
DATE: May 27, 2011
PAGE: 6
RE: IC&R: 2011-18

• Allow FGCU students to also take advantage of a free bus pass program.
• Need to recognize the new Collier/Lee County LeeTran bus line that should assist FGCU students in reaching campus by transit and promote its use.
• Need to have data re: local address of students on GIS maps and readily available to the public so that transportation patterns and potential solutions can be developed.
• Transit and alternative transportation modes must be mechanism for handling projected increase in student population—not building more road capacity.
• Recognize that the Lee County Office of Sustainability and the Lee County Metropolitan Planning Organization as well as other county departments play a vital role in moving toward the switch to a campus that supports multi-modal trips to campus.
• Add required coordination with Collier County on external transit services to the campus in addition to coordination with Lee County.
• Specifically, the following sections and GOPs should be addressed:
  ▪ Vol. 1; Section 3.2 Existing Campus Environment: North Lake Village
  ▪ Policy 1103.2.1 (f)
  ▪ Policy 1103.2.3

5. Parking

Providing convenient parking reduces individual incentives to use alternative means of transportation. Therefore, the goals of the campus should be to create incentives for alternative transportation and disincentives for the use of automobiles.

• Change to reduce parking on campus while simultaneously providing adequate transit service to substitute. Revise land uses on campus and the periphery accordingly.
  ▪ Eliminate descriptors that place a high value on convenient parking.
  ▪ Recognize that parking as an objective should be balanced with other campus needs, such as future academic buildings and the natural environment.
  ▪ Use the price of parking as a disincentive to drive to campus.
  ▪ Making parking convenient and within a close walking distance creates incentives to drive. While distribution of parking spaces around campus is a good idea, the sole purpose should not be to minimize walking time for users.
  ▪ Allow for parking facilities to not only increase, but to decrease as well. This would give the campus more flexibility as transportation demand management programs begin to work.

Specifically, the following sections and GOPs should be addressed:
  ▪ Vol. 1; Section 3.2 Existing Campus Environment
  ▪ GOAL 1101 - Provision of On-Campus Parking Spaces; Objective 1101.1
  ▪ Policy 1101.1.6
6. Recognize Sustainability and Transportation Programs within Lee and Collier County
   • Recognize the Lee County Office of Sustainability, the MPO Complete Streets Resolution, and the Lee County Complete Streets Resolution and Program, and the Lee County Transit Task Force as programs that enhance the quality of life.
   • Specifically, the following sections and COPs should be addressed:
     o Vol. 1. 4.5.4: Quality of Life:

7. Strengthen Campus Commitment to Sustainability
   • Recommendation: Add a policy that recognizes the contributions that a mode-shift from the single-occupancy vehicle to other alternative modes of travel (bicycling, walking, etc.) can make to a sustainable campus. Document should also recognize importance to lowering students’ cost of college education by eliminating necessity of owning car (which costs $9,500/year to maintain) to be FGCU student.
   • Specifically, the following sections and COPs should be addressed:
     • Vol. 1. 4.5.4: Quality of Life

CONSERVATION ELEMENT

1. Correct the typo in Policy 1301.2.9 “The University shall continue to implement comprehensive water conservation measures, to include: a) Compliance with NFWMD conservation program requirements;” to read SFWMD.

2. The local government should not be removed from Policy 1301.3.6 which reads “Plant and wildlife species protected by law will be addressed during site development in accordance with federal and, State and local regulations, and the environmental permits for site development.” There are Lee County ordinances applicable to protection of listed species that need to be considered.

LANDSCAPE DESIGN GUIDELINES ELEMENT

1. Policy 1601.2.3 states “Enhance existing design and plant palettes to provide a more “mannered” interpretation or vision of native habitats, and to provide an appropriate transition between natural and manmade areas.” The term “mannered” needs to be defined. Native plants need to be included in the manmade portion of the campus and water demanding non-native species should be reduced. A reduction in total lawn sod area should be proposed for significant reductions in maintenance, water use, fertilizer use and pesticide use.
2. The native Florida Royal Palm, *Roystonea regia*, should be added to the plant palette for the central campus "great space" designated in Policy 1601.1.7. There are also native lawn type grasses that could be utilized but this would require significant horticultural skill to achieve.

The Southwest Florida Regional Planning Council finds the Florida Gulf Coast University 2010 Draft Campus Master Plan to be regionally significant. With the recommended inclusions, changes, and improvements listed above incorporated into the document it would be consistent with the Strategic Regional Policy Plan and the State Comprehensive Plan.

If you have specific questions about the content of this letter, please contact Mr. Jim Beever directly at (239) 338-2550 ext 224, e-mail jbeever@swfrpc.org.

Sincerely,

SOUTHWEST FLORIDA REGIONAL PLANNING COUNCIL

Kenneth Heatherington, AICP
Executive Director

Cc: Barrett Genson, FGCU – Office of Facilities Planning