



September 6, 2016

Mr. Leo E. Ochs, Jr.
County Manager, Collier County Florida
3299 Tamiami Trail East, Suite 202
Naples, FL 34112-5746

Dear Mr. Ochs:

We, the Aircraft Owners and Pilots Association (AOPA), are writing to express our significant concern regarding the proposed Gateway Triangle project which will be located in what is commonly referred to as the Davis Triangle. The planned development is a short distance from the Naples Municipal airport (APF) which we believe will be negatively impacted should this project advance as currently planned.

AOPA represents nearly 350,000 pilots, aircraft owners, and aviation enthusiasts nationwide, of which nearly 25,000 reside in the State of Florida and hundreds within and around Collier County. As important economic drivers, we are committed to ensuring the continued viability, growth, and development of airports across Florida and the United States.

In response to Collier County Solicitation 16-6548, Sale of Gateway Triangle Parcels, dated December 15, 2015, Real Estate Partners International, LLC (hereafter referred to as Real Estate Partners) submitted a proposal for the purchase and development of roughly 5.27 acres in the Davis Triangle. In May 2016, Collier County entered into a sales contract with Real Estate Partners for mixed use development to include hotel, residential and shopping elements.

We have reviewed the development proposal submitted to the county. The proponent plans a residential tower of 18 stories, an office structure of 11 stories and a hotel of 10 stories. These proposed heights would appear to exceed several Collier County current land use zoning requirements.

For example, Collier County Land Development Code, and an amendment to the Gateway Triangle Mixed Use Overlay District Mixed Use Sub-District (GTMUD-MXD) sets the permitted residential density at 12 residential units per acre. The proposed development by Real Estate Partners would require an increase in density to 26 units per acre.

In addition, the same Development Code sets the maximum building height for residential and hotel uses at 112 feet.



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In order to accommodate the subject project, existing Collier County Code would require changes to allow a maximum height of 200 feet.

Based on our aviation and airspace experience, it is our belief that any increase in building height in the area of Davis Triangle will have an adverse impact on air navigation in the immediate environs of the Naples Municipal Airport.

In accordance with Federal Aviation Administration (FAA) requirements (14 Code of Federal Regulations 77.9), due to the projects location relative to the Naples Municipal Airport, the proponent is required to file a Notice of Proposed Construction (Form 7480-1) with the FAA. This request triggers an airspace study to determine if the proposed project will have an adverse impact on safe and efficient use of navigable airspace.

On June 14, 2016, the proponent filed the requisite forms with FAA for the tallest of the structures. On August 5, 2016, the FAA issued "Notice of Presumed Hazard" determinations. A copy of one of the Determinations is attached for reference.

These determinations indicate that the proposed Gateway Triangle project, as currently proposed, will have a detrimental impact on the Naples Municipal Airport. Therefore, AOPA opposes any modification to existing Collier County Land Use Development Code and the GTMUD-MXD that would allow construction of structures that exceed the currently requirements.

Since the proposed plans also indicates roof-top gathering areas, and since the project location is directly under the airport's aircraft traffic patterns and will be subject to overflight of aircraft, AOPA would strongly suggest that the county require both the project proponent to have full real estate disclosure notices as part of any sales agreement as well as Avigation Easements for overflight of aircraft.

We appreciate the County taking our concerns and views on this project into consideration as the Gateway Triangle project moves through the county planning process.

Regards,

Bill Dunn
AOPA Government Affairs