



STATE OF FLORIDA
DEPARTMENT OF COMMUNITY AFFAIRS

"Dedicated to making Florida a better place to call home"

CHARLIE CRIST
Governor

THOMAS G. PELHAM
Secretary

August 30, 2010

RECEIVED
AUG 23 2010

The Honorable Ray Judah, Chairman
Lee County Board of County Commissioners
Post Office Box 398
Fort Myers, Florida 33902-0398

COMMUNITY DEVELOPMENT

Dear Chairman Judah:

The Department has completed its review of the proposed Comprehensive Plan Amendment for Lee County (DCA No. 10D-1), which was received on July 1, 2010. We reviewed the amendment for consistency with Chapter 163, Part II, Florida Statutes, and Rule 9J-5, Florida Administrative Code, and the Lee County comprehensive plan. The Department raises no objections to the proposed amendment and this letter serves as the Department's Objections, Recommendations and Comments Report.

We have enclosed a copy of comments from other state and regional agencies. For your assistance, we have attached procedures for transmittal of the adopted comprehensive plan amendment. Please make this letter available for public inspection. If you have any question about this matter, please contact Joseph Murphy, Community Planner, at (850) 921-4767.

Sincerely,

Mike McDaniel, Chief
Office of Comprehensive Planning

MM/jm

Enclosures: Review Agency Comments

cc: Paul O'Connor, AICP, Lee County Planning Director
Ken Heatherington, Executive Director, Southwest Florida Regional Planning Council

NOTICE OF REVISIONS TO PROCESSING PROCEDURES

Effective Date of Revisions to Rule 9J-11 Florida Administrative Code

The Department has revised the procedures for submitting comprehensive plan amendments. These new procedures became effective May 12, 2010.

Reason for Revisions

The revisions implement statutory changes to Chapter 163, Part II, Florida Statutes, related to allowable exemptions from the twice per calendar year limitations and prohibitions that may affect adoption of comprehensive plan amendments. In addition, changes were made to clarify plan amendment submittal requirements based on the Department's recent experience.

Highlight of Revisions

The revised procedures relate to the submittal of proposed and adopted comprehensive plan amendments, including small scale amendments, and a revised RPM-BSP-EXEMPT REVIEW Form used when submitting exempt and small scale amendments. The major revisions to Rule 9J-11, include 1) the deletion of the requirements to submit replacement pages and a revised table of contents to the comprehensive plan; 2) an update to the allowable exemptions to the twice per calendar year limitation; 3) an update to the statutory prohibitions that may affect adoption of comprehensive plan amendments; 4) clarification on the submittal of the de minimis impact report associated with the capital improvement annual update amendment; 5) a requirement that all future land use map amendments be submitted in color format; and 6) the revised RPM-BSP-EXEMPT REVIEW Form to address affordable housing and Areas of Critical State Concern.

Effect of Revisions

The revisions improve the overall comprehensive plan amendment process by helping local governments prepare and submit complete plan amendment packages. The rule provides the local government with a complete list of statutory exemptions and a complete list of possible prohibitions to the amendment process. In addition, the revised rule clarifies submittal requirements and this increases the likelihood that a submittal package will be initially determined complete.

Location of Revisions

The revisions are located on the Division of Community Planning's website to assist local governments with the submittal of their comprehensive plan amendment packages and may be viewed at "**Submitting Comprehensive Plan Amendments and Developments of Regional Impact**" <http://www.dca.state.fl.us/fdcp/dcp/Procedures/index.cfm> .

Additional Information

Ray Eubanks, Plan Processing Administrator

(850) 922-1767

ray.eubanks@dca.state.fl.us

TRANSMITTAL PROCEDURES

This letter and the enclosed external agency comments are being issued pursuant to Rule 9J-11.010, Florida Administrative Code. Upon receipt of this letter, the County has 60 days in which to adopt, adopt with changes, or determine that the County will not adopt the proposed amendment. The process for adoption of local comprehensive plan amendments is outlined in s.163.3184, Florida Statutes, and Rule 9J-11.011, Florida Administrative Code.

Within ten working days of the date of adoption, the County must submit the following to the Department:

Three copies of the adopted comprehensive plan amendments;

A listing of additional changes not previously reviewed;

A listing of findings by the local governing body, if any, which were not included in the ordinance; and

A statement indicating the relationship of the additional changes to the Department's Objections, Recommendations and Comments Report.

The above amendment and documentation are required for the Department to conduct a compliance review, make a compliance determination and issue the appropriate notice of intent.

Please be advised that the Florida Legislature amended Section 163.3184(8)(c), Florida Statutes, requiring the Department to provide a courtesy information statement regarding the Department's Notice of Intent to citizens who furnish their names and addresses at the local government's plan amendment transmittal (proposed) or adoption hearings. In order to provide this courtesy information statement, local governments are required by the law to furnish to the Department the names and addresses of the citizens requesting this information. Please provide these required names and addresses to the Department when you transmit your adopted amendment package for compliance review. For efficiency, we encourage the submittal information sheet in an electronic format.



Southwest Florida Regional Planning Council

1926 Victoria Avenue, Fort Myers, Florida 33901-3414
(239)338-2550 FAX (239)338-2560 SUNCOM (239)748-2550

July 30, 2010

Mr. Ray Eubanks
Plan Review and Processing Administrator
Department of Community Affairs
Bureau of State Planning
Plan Processing Section
2555 Shumard Oak Boulevard
Tallahassee, Florida 32399-2100

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RECEIVED
AUG 5 - 2010
DIVISION OF
COMMUNITY PLANNING

**Re: Lee County / DCA 10D-1
Florida Gulf Coast Research and Technology Park**

Dear Mr. Eubanks:

Staff of the Southwest Florida Regional Planning Council reviewed the proposed amendment (DCA 10D-1) to the Lee County Comprehensive Plan. The review was performed according to the requirements of the Local Government Comprehensive Planning and Land Development Regulation Act.

The Council will review the nineteen proposed amendments at its September 16, 2010 meeting. Council staff has recommended that the Council approve its recommendations as found in the attached official staff report. If the Council's action differs from staff recommendation, we will notify you.

Sincerely,
Southwest Florida Regional Planning Council

Kenneth Heatherington
Executive Director

KH/DEC
Attachment

Cc: Paul O'Connor, AICP, Director, Lee County

**LOCAL GOVERNMENT COMPREHENSIVE PLAN AMENDMENTS
LEE COUNTY**

The Council staff has reviewed a proposed amendment to the Lee County Comprehensive Plan (DCA 10D-1). These amendments were developed under the Local Government Comprehensive Planning and Land Development Regulation Act. A synopsis of the requirements of the Act and Council responsibilities is provided as Attachment I. Comments are provided in Attachment II. A location map is provided as Attachment III.

Staff review of the proposed amendments was based on whether they were likely to be of regional concern. This was determined through assessment of the following factors:

1. Location--in or near a regional resource or regional activity center, such that it impacts the regional resource or facility; on or within one mile of a county boundary; generally applied to sites of five acres or more; size alone is not necessarily a determinant of regional significance;
2. Magnitude--equal to or greater than the county threshold for a development of regional impact of the same type (a DRI-related amendment is considered regionally significant); and
3. Character--of a unique type or use, a use of regional significance, or a change in the local comprehensive plan that could be applied throughout the local jurisdiction; updates, editorial revisions, etc. are not regionally significant.

A summary of the results of the review follows:

<u>Proposed Amendment</u>	<u>Factors of Regional Significance</u>			
	<u>Location</u>	<u>Magnitude</u>	<u>Character</u>	<u>Consistent</u>
CPA 2010-01 Florida Gulf Coast Research and Technology Park	yes	yes	yes	(1) regionally significant; and (2) conditionally consistent with SRPP

RECOMMENDED ACTION: Approve staff comments. Authorize staff to forward comments to the Department of Community Affairs and Lee County.

07/10

Comprehensive Plan Amendments

A local government may amend its plan twice a year. (Amendments related to developments of regional impact, certain small developments, compliance agreements, and the Job Siting Act are not restricted by this limitation.) Six copies of the amendment are sent to the Department of Community Affairs for review. A copy is also sent to the regional planning council, the water management district, the Florida Department of Transportation, and the Florida Department of Environmental Protection.

[s. 163.3184(3)(a)]

The proposed amendment will be reviewed by DCA in two situations. In the first, there must be a written request to DCA. The request for review must be received within forty-five days after transmittal of the proposed amendment. [s. 163.3184(6)(a)] Review can be requested by one of the following:

- the local government that transmits the amendment,
- the regional planning council, or
- an affected person.

In the second situation, DCA can decide to review the proposed amendment without a request. In that case, DCA must give notice within thirty days of transmittal.

[(s. 163.3184(6)(b))]

Within five working days after deciding to conduct a review, DCA must forward copies to various reviewing agencies, including the regional planning council. [s. 163.3184(4)]

Regional Planning Council Review

The regional planning council must submit its comments in writing within thirty days of receipt of the proposed amendment from DCA. It must specify any objections and may make recommendations for changes. The review of the proposed amendment by the regional planning council must be limited to "effects on regional resources or facilities identified in the strategic regional policy plan and extra-jurisdictional impacts which would be inconsistent with the comprehensive plan of the affected local government."

[s. 163.3184(5)]

After receipt of comments from the regional planning council and other reviewing agencies, DCA has thirty days to conduct its own review and determine compliance with state law. Within that thirty-day period, DCA transmits its written comments to the local government.

NOTE: THE ABOVE IS A SIMPLIFIED VERSION OF THE LAW. REFER TO THE STATUTE (CH. 163, FS) AND THE RULE (9J-11, FAC) FOR DETAILS.

Under the provisions of the existing Tradeport descriptor language found in Policy 1.2.2, the applicant would be permitted to build the desired industrial uses and the desired research and development components of the DRI. However, the commercial uses would be limited to those that are ancillary to the uses currently allowed with the Tradeport Future Land Use Category. The applicant has proposed that under the existing Lee Plan provisions they could develop 550,000 square feet of industrial uses and 100,000 square feet of office uses.

The applicant is proposing, as part of this amendment, to include 700,000 square feet of retail commercial and a 240-room hotel on the subject 103 acres, which would be in addition to the permitted ancillary and corner store uses that are allowed in the Tradeport future land use category.

8. Is the Amendment consistent with the Strategic Regional Policy Plan:

The subject site was originally designated Open Lands and Wetlands on the Lee County Future Land Use Map (FLUM) that was adopted in 1984. The Open Lands land use category was established as a non-urban future land use category with a density range of 1 dwelling unit per 5 acres to 1 dwelling unit per acre. The Open Lands land use category was to be sparsely developed and provide viable agricultural areas for Lee County. Existing and planned infrastructure was far below that which the urban areas could expect. The Open Lands designation was retired by the County in 1990, when the Density Reduction / Groundwater Resource (DR/GR) designation was introduced.

The subject lands were changed to DR/GR and Wetlands in 1990. The new DR/GR designation that was applied to all uplands that were at the time designated Rural or Open Lands that were located north of the future urban areas of Bonita Springs, east of I-75, southeast of the Southwest Florida International Airport, and south of SR 82. It was the intent of the new DR/GR land use designation to protect and restrict development on areas of the County that provided substantial groundwater recharge to the area's aquifers which in turn would provide for future well field development.

Following an Administrative Hearing and Final Order by the Governor and Cabinet, the subject site's future land use category was changed from DR/GR and Wetlands to the Airport Commerce and Wetlands in 1996. The Airport Commerce Future Land Use Category was subsequently renamed the Tradeport Future Land Use Category in 2004 following a request of the Lee County Port Authority.

The applicant's proposed text amendment requests a change to the Tradeport Future Land Use Category to accommodate "community and regional" retail commercial uses on the 727-acre Florida Gulf Coast Research and Technology Park DRI to allow at buildout 700,000 square feet. The proposed commercial element that would be allowed by the change would be located on the northeastern quadrant of the intersection of Ben Hill Griffin Parkway and Alico Road.

Council staff has reviewed the requested changes and generally support the placement of the future research and technology park with a commercial element as proposed. This development could provide much needed jobs in the region and is appropriately placed at a

not clearly identified and that additional conditions related to preserve areas and stormwater management lakes on the site may be necessary.

4) Southwest Florida International Airport

As currently situated, the northern boundary of the subject development site is adjacent to the entry roadway to the Southwest Florida International Airport. The airport is a significant regional resource and northern border of this project will strongly impact the visual experience of all persons entering and leaving the airport site. County staff has stated that the northern edge of the subject property needs to address buffering, building design and land uses along this edge. The applicant to date has not reached agreement on this issue. Council staff believes that the airport is one of the most important facilities in the region and must be treated as such. Council staff strongly supports the County staff desire to assure that this edge is properly landscaped and future office and research building be designed and located in this area of the site to provide an appropriate visual experience for all users of the airport in the future.

Council staff finds that these issues are regional in nature and will be more adequately addressed through the final Development of Regional Impact Development Order. Because these issues are not finalized at this time, Council staff finds that the requested amendment is regionally significant and conditionally consistent with the Strategic Regional Policy Plan.

9. **Applicable Strategic Regional Policy Plan Goals, Strategies and Actions:**

**Economic Development
Economic Infrastructure**

Goal 1: A well-maintained social, health, and educational infrastructure to support business and industry.

Strategy: Maintain the physical infrastructure to meet growth demands.

- Action 1:** Review plan amendments, development proposal, and clearinghouse items for public facility deficits and encourage mitigation of those deficits.
- Action 2:** Assist local governments and state agencies in planning for future support service facilities, before the need arises.
- Action 3:** Review proposed public facilities to ensure their location in urban areas that have in place, or are covered by binding agreements to provide, the resources and facilities for desired growth in an environmentally acceptable manner.
- Action 4:** Study alternative and assist other entities to study alternatives to encourage land development that maximizes the use, rehabilitation, and re-use of existing facilities, structures, and buildings as an alternative to new construction and development.
- Action 5:** Review proposed public facilities and services to ensure that costs are allocated on the basis of benefits received by existing and future residents.

Action 2: Work with business, industry, and government to target industries appropriate for their markets.

Regional Cooperation

Goal 6: A system of cooperation and coordination for economic development that includes a broad range of public and private participants.

Strategy: Promote regional cooperation and coordination for economic development.

Action 1: Promote cooperative arrangements and actions for economic development among business, governmental, and environmental groups, and other public and private entities.

Regional Transportation Element Balanced Intermodal/Multimodal System

Goal 1: Construct an interconnected multimodal transportation system that supports community goals, increases mobility and enhances Southwest Florida's economic competitiveness.

Strategy: Ensure that a network of interconnected roads exist that provide the timely, cost effective movement of people and goods within, through and out of the Region.

Action 1: Annually provide a report, in conjunction with FDOT, MPOs, and local government on the level of service (LOS) on regionally significant roadway network.

Livable Communities

Goal 2: Livable communities designed to affect behavior, improve quality of life and responsive to community needs.

Strategy: Promote through the Council's review function a good environment for driving, walking, bicycling, and public transit using a highly connected network of public streets, green space, and community centers.

Action 4: Review comprehensive plans and land development regulations for incentives to develop and redevelop using mixed uses, higher densities, shared parking; and improved vehicular, mass transit, pedestrian and bicycle access and travel, as well as providing a variety of affordable residential densities and types.

Regional Cooperation

Goal 5: Develop a cost-effective and financially feasible transportation system that adequately maintains all elements of the transportation system to better preserve and manage the Region's urban and non-urban investment.

This amendment will provide a more appropriate commercial development scheme for the entire project and will impact the regionally significant roadways and natural resource systems that by definition will impact other local governments. Details and appropriate mitigation of these impacts will have to be finalized in the DRI review process.

Analysis of the effects on the proposed amendments on the following issues to the extent they are addressed in the Strategic Regional Policy Plan on:

12. Compatibility among local plans including, but not limited to, land use and compatibility with military bases:

The proposed development allowed by the requested amendment is consistent with surrounding land uses and will provide increase commercial opportunities to the rest of the project's land uses thereby reducing trips to meet commercial needs by future employees and further reducing energy needs and greenhouse gas emissions. The land uses proposed by the applicant for the project is consistent with the Tradeport Future Land Use Category and is appropriate given that the Southwest Florida International Airport and the Gulf Coast Town Center is adjacent to the subject site. Southwest Florida does not have any military bases.

13. Impacts to significant regional resources and facilities identified in the Strategic Regional Policy Plan, including, but not limited to, impacts on groundwater recharge and the availability of water supply:

The proposed amendment will have impacts to the region's groundwater recharge due to the proposed removal of some of the subject site's wetland areas. The preservation of these resources to maintain the maximum extent possible groundwater recharge characteristics on the site and the availability of water for the water supply of the region will have to be finalized during the DRI review process.

14. Affordable housing issues and designation of adequate sites for affordable housing:

Affordable housing issues related to the proposed development has not been finalized at this time. The proposed project will be a significant employment center when finalized and will require affordable housing for its future employees. At the present time there are significant sources of affordable housing in the nearby San Carlos Park residential area. This issue will be addressed and finalized in the DRI review process.

15. Protection of natural resources of regionally significance identified in the Strategic Regional Policy Plan including, but limited to, protection of spring and groundwater resources, and recharge potential:

The proposed development site being affected by this amendment has wetland resources located on the property. These resources have been identified by the County as important to the overall regional wetlands system and preservation of the most important natural resources on the site will be required. The subject property has an active ERP permit that has been approved by the SFWMD. The County still has some areas of the site that they wish to preserve. The final plans for the site will have to be approved through the DRI review process and the natural resources that must be maintained will be decided at that time. There are no natural springs being impacted by this proposed amendment.

Memo

To: Alvin "Chip" Block
Principal Planner

From: Andrew Getch, P.E. *AG*
Engineering Manager I

Date: July 23, 2010

Subject: Florida Gulf Coast Technology – DRI2007-00002 & DCI2007-00036

Summary

The traffic analysis for the Florida Gulf Coast Technology Research Park proposes a Phase 1 development program with 350,000 square feet of retail, 200,000 square feet of office, 2,100,000 square feet of industrial, and 240 hotel rooms. The predominant proposed industrial use is High-Cube Warehousing. The application proposes a traffic reanalysis for double that level of development at a proposed buildout of 2022. The project has access to Ben Hill Griffin Parkway and Alico Road and will generate 1,991 net new external trip ends in the p.m. peak hour.

Phase 1 of the project has regional impacts on Alico Road and on Daniels Parkway. The transportation impacts for Phase 1 will be mitigated by the payment of roads impact fees and the provision of site-related improvements.

To address operational and safety concerns on Alico Road and improve connectivity and circulation, LCDOT recommends replacing three proposed direct project access points with interconnection to adjacent properties.

LCDOT recommends a condition identifying right-of-way needed for site-related improvements. LCDOT also requests accommodation of future east-west capacity needs, both along Alico Road and on an existing private east-west roadway easement across the property. LCDOT recognizes that this will require discussion with adjacent property owners beyond this project.

Applicant's Analysis:

Trip Generation

The trip generation estimate is based on data from the Institute of Transportation Engineers publication, Trip Generation 8th edition, supplemented by the ITE Trip Generation Handbook, 2nd Edition. The publication provides a database of suburban study sites and categorizes the data into similar groupings called land use codes. The data for each land use code provides data motor vehicle counts at different time periods and study site sizes. The data is used to develop formulas which are used for estimating the trip generation of new development.

The trip generation estimate is based on the land development parameters in Table 1. The P.M. peak trip generation summary in Table 2 below is derived from the TIS on pages 8 and 9 (SR 4). The total trip ends are the number of vehicle crossings at the driveway(s) for each individual use. The number is reported as trip ends. Internal trip ends are the result of a trip that stays within the project between two different project uses. External trip ends are calculated as the difference between total and internal trip ends. A pass-by trip is a stop on the route to a primary destination. A pass-by trip is not a new trip to the transportation system and is only added at the project driveway. Net new external trip ends are calculated as the difference between external and pass-by trip ends. Net new trip ends are new to the transportation system as a result of the project. The daily net new external trip generation estimate is 20,387 trip ends at the end of Phase 1 and 35,777 at build-out of the project.

Table 2
P.M. Peak Hour Trip Generation Summary

Trip Ends	Phase 1 – 2017			Phase 2 – Build-out		
	Enter	Exit	Total	Enter	Exit	Total
Total	949	1,597	2,546	1,551	2,672	4,223
Internal	90	90	180	155	155	310
External	859	1,507	2,366	1,396	2,517	3,913
Pass-By	187	188	375	200	200	400
Net New External	672	1,319	1,991	1,196	2,317	3,513

Trip Distribution

The DRI analysis utilized a computer modeling program called the Florida Standard Urban Transportation Modeling Structure (FSUTMS) to perform the remainder of the four step process. FSUTMS is developed by the Florida Department of Transportation. A

July 23, 2010

Florida Gulf Coast Technology Park – DRI2007-00002 & DCI2007-00036

Ben Hill Griffin Parkway	Project entrance	Terminal Access Rd
Daniels Pkwy	SR 82	I-75
I-75	Corkscrew Rd	Alico Rd
Three Oaks Pkwy	Corkscrew Rd	San Carlos Blvd

The analysis indicated a number of needed intersection improvements at project driveways and within the above roadway segments. The analysis recommended signal retiming at several intersections outside of the noted roadway segments. The analysis also identified Daniels Parkway in Phase 1 as a backlogged roadway segment.

Mode Choice

As noted above, the ITE Trip Generation data and the Lee County validated FSUTMS travel model both are based on measured motor vehicle traffic. The method of analysis does not include trips for other modes of travel such as transit, bicycle or pedestrian. Therefore the traffic analysis was for estimation of motor vehicle travel patterns and resultant impacts.

Transportation Mitigation

The TIS indicates that based on the requested development parameters and the current schedule, Roads Impact Fees for Phase 1 equals \$16,088,790. Calculation of the proportionate share for Alico Road and Daniels Parkway improvements is addressed in the staff analysis below.

LCDOT Staff analysis

The applicant indicates in the TIS that the project wishes to determine transportation mitigation at this time for Phase 1 and to determine land uses, horizon years and traffic mitigation of development beyond Phase 1 as part of a traffic re-analysis. LCDOT agrees with this approach and based on this understanding is limiting comments in this memorandum to the mitigation of transportation impacts based on the Phase 1 analysis. LCDOT recommends a condition to require a transportation reanalysis of all development beyond Phase 1 and to conduct review of the transportation reanalysis as part of a Notice of Proposed Change.

Trip Generation Estimate

LCDOT accepts the overall estimate of 1,991 net new external trip ends and recommends that as the basis for transportation monitoring conditions. There are two primary comments on trip generation which do not appear to affect the determination of transportation mitigation. These relate to the use of High-Cube Warehousing and internal capture.

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Florida Gulf Coast Technology Park – DRI2007-00002 & DCI2007-00036

Trip Distribution & Assignment

The project trip assignment is based on the project TAZ established in FSUTMS with one connection to each roadway in the model. The Master Concept Plan indicates seven proposed project access points to Alico Road along approximately 5,000 feet of frontage. The access point onto Ben Hill Griffin Parkway is identified in Board of County Commissioners Resolution 06-11-30 as a southbound left, right-in/right-out access point. The Master Concept Plan depicts this connection as an internal roadway.

The TIS analyzed one full median opening, two directional median openings and four right-in/right-out connections to Alico Road. The proposed full median opening and one of the proposed directional median openings on Alico Road are depicted on the Master Concept Plan as an internal roadway.

Access to Alico Road.

LCDOT has concerns with the configuration and proposed number of access points to Alico Road. The roadway frontage of the subject property is depicted as one parcel in the property appraiser's database. The Master Concept Plan indicates three parcels along Alico divided by the two proposed internal roadways. Seven access points do not appear to be required to provide reasonable access to the subject property.

Land uses directly contributing to existing traffic on Alico Road include agricultural uses, mining uses, SWFIA and other proposed projects. Traffic counts in 2000 for a BOCC requested analysis indicated large trucks were over 30 percent of Alico Road traffic west of Ben Hill Griffin Parkway. Traffic counts in 2007 for the Lee County Truck Impact Evaluation Study indicate large trucks comprised the majority of traffic on Alico Road. The majority of large trucks on Alico Road appear to be dump trucks traveling to and from mining uses.

Each additional access point on a roadway represents an added conflict point. A loaded dump truck may weigh up to 70,000 pounds and requires longer acceleration and deceleration distances than a passenger vehicle. At the intersection with Ben Hill Griffin Parkway, Alico Road is a four-lane divided roadway. However, Alico Road has a transition to a two-lane undivided roadway approximately ¼ mile east of Ben Hill Griffin Parkway. Median movements are typically determined at the time of local development order subject to LDC Section 10-285 and AC-11-3.

The Lee County Land Development Code minimum connection separation standard for an arterial is identified in Section 10-285(a) as 660 feet. The Master Concept Plan indicates a minimum connection separation of 660 feet for all proposed access points.

Proposed access point A1 does not meet connection separation under the current LDC Section 10-285. The Master Concept Plan indicates measurement of connection

July 23, 2010

Florida Gulf Coast Technology Park – DRI2007-00002 & DCI2007-00036

The 2008 traffic data with an AADT on Alico Road was 5,800. The 2009 Lee County Concurrency Report identifies a 2008 100th highest hour volume of 260 and a future forecast volume of 517. The future forecasted volume represents existing traffic plus estimated traffic from unconstructed projects with a concurrency certificate. The 2009 Traffic Count Report volume indicated an AADT of 3,600. This is one of the lowest AADT on Alico Road since counts began in 1990. The future estimate of AADT is a product of the estimated change in future traffic volumes. The historic traffic volume on this segment of Alico Road has varied widely, from a low of 3,400 in 1995 to a high of 14,700 in 2004. Future traffic volume without a project is referred to as background traffic. Projections of future traffic volume are typically based on historic trends however the data appears to have a lower correlation to time. Traffic volumes are typically influenced by population, land use changes, changes in travel patterns, and transportation improvements. LCDOT has a concern that traffic volumes on Alico Road appear to be more highly influenced by levels of construction activity than other roadways.

Land uses directly contributing to existing traffic on Alico Road include agricultural uses, mining uses, SWFIA and other proposed projects. Studies of Alico Road have shown that large trucks comprised the majority of traffic east of Ben Hill Griffin Parkway. The majority of large trucks on Alico Road appear to be dump trucks traveling to and from mining uses. As noted above, Airport Haul Road is the access to the southern gate to SWFIA. The south gate is used as the primary construction entrance for SWFIA.

Other adjacent proposed projects include Alico Airpark, and Premier Airport Park. Potential daily traffic from these adjacent projects is not accounted for in a trend based on historic growth rates.

Alico Airpark was approved in Resolution Z-04-025 as a mixed use planned development project east of Airport Haul Road with 1,200,000 square feet of industrial park and 240,000 square feet of commercial. The project has DOS2005-00249 approval for infrastructure, but has not begun construction. The site is has more recently been identified as a hub for economic development.

Premier Airport Park is approved for 624,500 square feet of industrial park in DOS2008-00036. The Board of County Commissioners Resolution Z-09-012 approved approximately 1,680,000 square feet of industrial park including 868,500 square feet of high-cube warehousing. The project has indirect access to Alico Road by way of Airport Haul Road. An application is proceeding to hearing to revise the development parameters to 843,000 square feet of industrial park uses, and 872,000 square feet of warehousing uses. The Premier Airport Park TIS indicates that the project at buildout will generate 929 trip ends in the P.M. peak hour. The TIS indicates 689 vehicles from the project will be traveling westbound in the peak direction on Alico Road east of Ben Hill Griffin Parkway.

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Florida Gulf Coast Technology Park – DRI2007-00002 & DCI2007-00036

However, LCDOT staff agrees with the determination that Alico Road from the project entrance to Ben Hill Griffin Parkway will be adversely impacted with the project. This is based on the potential future background traffic volumes on Alico Road noted previously. The build-out analysis identifies this project alone with 838 p.m. peak hour peak direction trips. This plus background traffic will exceed the capacity on Alico Road.

Proportionate Share Calculations

The formula to determine proportionate share is in F.A.C. Rule 9J-2.045. The formula is

$$\frac{\text{DRI trips} \times \text{cost}}{(\text{SV increase})}$$

The cost estimate for four-laning Alico Road from Airport Haul Road to Ben Hill Griffin Parkway in the Draft CIP is \$18,770,000, a project length of 1.78 miles. The length of roadway requiring four-laning along the subject property frontage is approximately 0.9 miles. As noted above the project is estimated to have westbound 560 net new trip ends traveling in the peak hour peak direction from the project entrance to Ben Hill Griffin Parkway. The prorated cost for the impacted road segment is = $\$18,770,000 \times (0.9 / 1.78)$ = approximately \$9,500,000. The maximum service volume for a four-lane arterial roadway is 1,970. The added capacity is 1,000 vehicles. The project Phase 1 proportionate share for the Alico Road four-laning is = $560 \times (\$9,500,000) / 1,000 = \$5,320,000$.

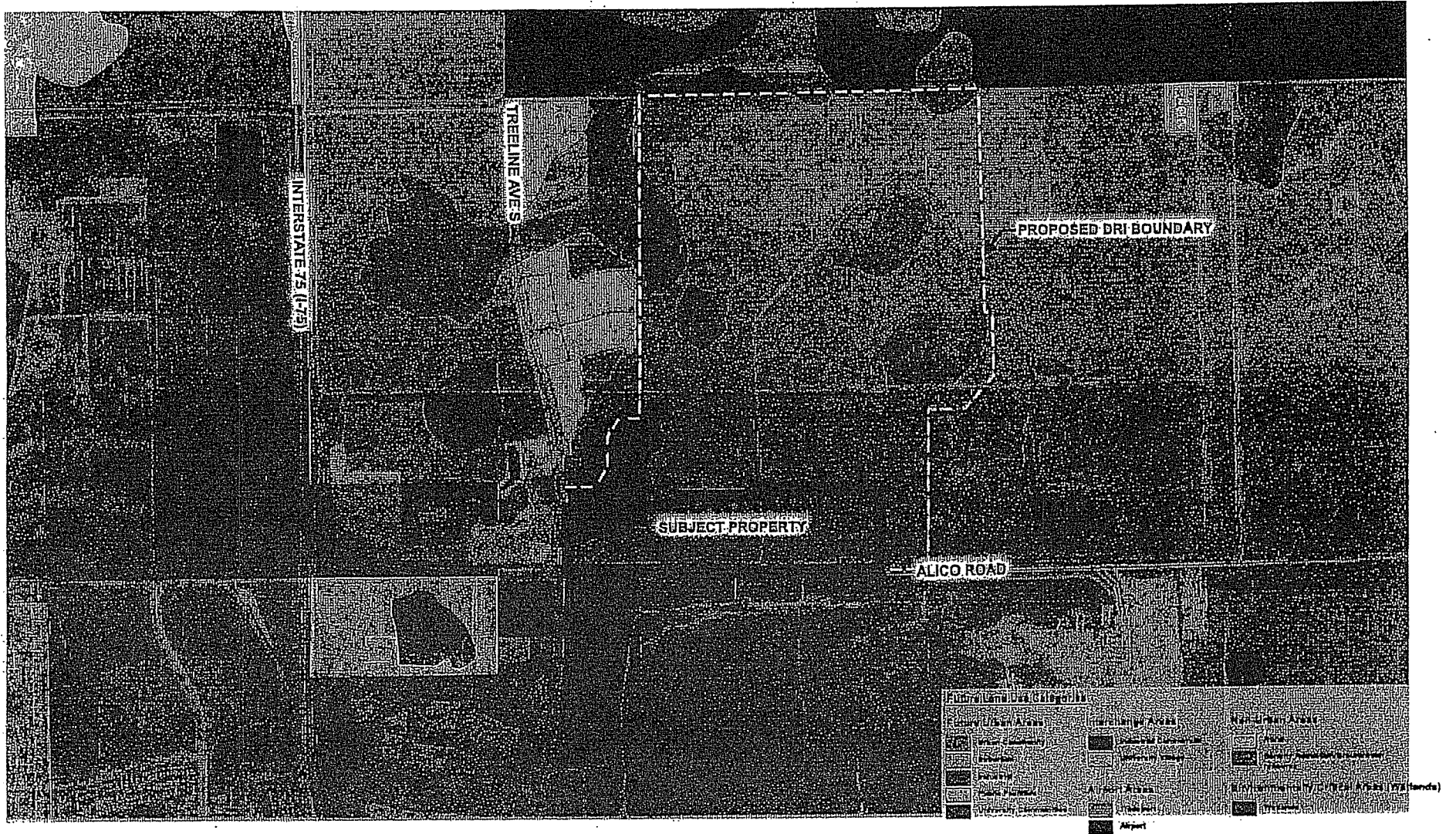
The cost estimate in the MPO 2030 plan for a Daniels Parkway eight lane expressway from east of Chamberlin Parkway to west of Metro Parkway (5.60 miles) is \$478,330,550. The significantly and adversely impacted roadway segment is from Treeline Avenue to I-75, approximately 0.6 miles. The prorated cost for this road segment = $\$478,330,550 \times (0.6 / 5.60)$ = approximately \$51,200,000. The capacity increase is approximately 1,840. The project volume on the segment is 239. The project Phase 1 proportionate share for the Daniels Parkway eight-laning is = $239 \times (\$51,200,000) / 1,840 = \$6,650,000$.

The total project proportionate share = $\$5,320,000 + \$6,650,000 = \$11,970,000$. As noted previously, the TIS indicates Roads Impact Fees for Phase 1 equals \$16,088,790 which is greater than the calculated proportionate share. Based on this data and the current Transportation Uniform Standard Rule, LCDOT recommends the payment of Roads Impact Fees will adequately mitigate transportation impacts from Phase 1 of the project.

Planned East-West Improvements

Maps

Lee County
DCA 10D-1





SOUTH FLORIDA WATER MANAGEMENT DISTRICT

July 30, 2010

Ray Eubanks, Administrator
Plan Review and DRI Processing
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, FL 32399-2100

RECEIVED
AUG 5 - 2010
DIVISION OF
COMMUNITY PLANNING

Dear Mr. Eubanks:

**Subject: Lee County, DCA #10D-1
Comments on Proposed Comprehensive Plan Amendment Package**

The South Florida Water Management District (District) has completed its review of the developer proposed Florida Gulf Coast Technology and Research Park amendment in Lee County (County). The proposed amendment to the Lee County comprehensive plan involves land use text changes initially intended for a 103-acre site within the proposed 727-acre Florida Gulf Coast Technology and Research Park Development of Regional Impact (DRI). As transmitted, revisions to Policy 1.2.2 appear to impact the entire Tradeport future land use category and not just the DRI portion that is exempt from the twice-a-year limitation on amendment transmittals.

We have the following recommendations, which we request you incorporate into your response to the County:

Water Supply:

- **Clarify the maximum amount of development allowed by the land use text change, and the resulting cumulative potable water supply demands at maximum allowable development.** The amendment package includes no data and analysis quantifying the impact of the proposed text change on either the amount of overall development allowed within the Tradeport land use category or the resulting potable water supply demands
- **Demonstrate that the maximum allowable potable water demands for the entire area impacted by the proposed text change, together with other approved land use demands within the same service area(s), will not exceed either the permitted allocation or the existing/planned capacities of the intended water treatment facility(ies).** The comprehensive plan package indicates that the Corkscrew water treatment plant will be the service provider for the DRI; however, the DRI application indicates that the Pinewood facility will be providing service. The Pinewood water treatment plant is within approximately 0.8 million gallons per day of its capacity, and the addition of the site's demands may exceed that capacity when other approved but undeveloped land uses within the service

Mr. Ray Eubanks, Administrator

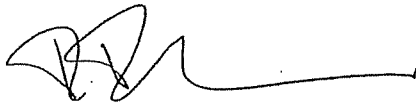
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area, such as the University Highlands DRI, are taken into account. If the described interconnections between other nearby Lee County utilities are intended to be used on a routine, daily basis, provide information demonstrating that the other interconnected Lee County utilities can provide the volume of water anticipated to be needed beyond the allocation or capacity of the Pinewood facility, given all other commitments within their interconnected service areas.

The District offers its technical assistance to the County and the Department of Community Affairs in developing sound, sustainable solutions to meet the County's future water supply needs and protect the region's water resources. For assistance or additional information, please contact Henry Bittaker at (561) 682-6792 or hbittak@sfwmd.gov.

Sincerely,



Rod Braun

Director

Intergovernmental Policy and Planning Division
South Florida Water Management District

c: Henry Bittaker, SFWMD
Ken Heatherington, SWFRPC
Paul O'Connor, Lee County
Doug Muerer, Lee County Utilities
Jim Quinn, DEP
Brenda Winningham, DCA

LOCAL PLANNING AGENCY

PURPOSE:

1. Have general responsibility for the conduct of the comprehensive planning program;
2. Be responsible for preparation of the local comprehensive plan and make recommendations to the Board of County Commissioners regarding the adoption of such plan or element or portion thereof.
3. Monitor and oversee the effectiveness and status of the comprehensive plan and recommend to the Board of County Commissioners such changes in the comprehensive plan as required, including preparation of the periodic reports required by F.S. 163.3191.
4. Review proposed land development regulations and land development codes or amendments hereto, and make recommendations to the Board of County Commissioners as to consistency of the proposal with the adopted comprehensive plan or element or portion thereof.
5. Perform any functions, duties, and responsibilities which may be assigned to it by the Board of County Commissioners or general or special law.