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June 25, 2010

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

Re: CPA2010-01 Florida Gulf Coast Research and Technology Park Amendment to the Lee Plan
Transmittal Submission Package
Development of Regional Impact Related Comprehensive Plan Amendment

Dear Mr. Eubanks:

In accordance with the provisions of F.S. Chapter 163.3187(1)(b) and of 9J-11.006, this submission package constitutes the transmittal package for an amendment to the Lee Plan known as CPA 2010-01 - Florida Gulf Coast Research and Technology Park. The proposed amendment is one of the exemptions to the twice per calendar year limitation on the adoption of comprehensive plan amendments, due to the fact that it is directly related to a proposed Development of Regional Impact, the Florida Gulf Coast Technology and Research Park DRI. The Local Planning Agency held a public hearing for this plan amendment on June 18, 2010. The Board of County Commissioners transmittal hearing for the plan amendment was held on June 23, 2010. The Board of County Commissioners voted to transmit the attached Lee Plan amendment package at the June 23, 2010 hearing. Per 9J-11.006(1)(a)(3), **Lee County is requesting that the Department review the proposed amendment and provide an Objections, Recommendations, and Comments (ORC) Report.** The proposed amendment is not applicable to an area of critical state concern. The Board of County Commissioners has stated its intent to hold an adoption hearing at the same time as the hearing for Application for Development Approval for the DRI.

The subject plan amendment is a privately-initiated request to amend the Tradeport future land use category to place a limit on the amount of "stand alone" retail commercial uses that may be permitted within the land use category. Currently "ancillary retail commercial uses" are permitted, but "ancillary" is not defined as to the types or quantity of retail commercial uses that are permitted.

The name, title, address, telephone number, facsimile number, and email address of the person for the local government who is most familiar with the proposed amendments is as follows:

Mr. Paul O'Connor, AICP
Lee County Planning Division Director
P.O. Box 398
Fort Myers, Florida 33902-0398

(239) 533-8309
Fax (239) 485-8319
Email: oconnops@leegov.com

Included with this package, per 9J-11.006, are one paper copy and two CD ROM copies, in PDF format, of the proposed amendments and supporting data and analysis. By copy of this letter and its attachments, I certify that these amendments and supporting data and analysis have been sent on this date to the agencies listed below.

Sincerely,
DEPT. OF COMMUNITY DEVELOPMENT
Division of Planning



Paul O'Connor, AICP, Director
Director

All documents and reports attendant to this transmittal are also being sent, by copy of this cover, to:

Wendy Evans
The Department of Agriculture and Consumer Services

Jim Quinn
Department of Environmental Protection

Susan Harp
Florida Department of State

Mary Ann Poole
Florida Fish and Wildlife Conservation Commission

Lawrence Massey
FDOT District One

Ken Heatherington
Southwest Florida Regional Planning Council

Jim Jackson, A.I.C.P., Senior Supervisor Planner
South Florida Water Management District.

Comprehensive Plan Citizen Courtesy Information List

Local Government: LEE COUNTY

No Signatures Received

Hearing Date: June 23, 2010

Type of Hearing: Transmittal of DRI Related Amendments to the Lee County Comprehensive Plan

CPA2010-00001 - Florida Gulf Coast Technology and Research Park

CPA2010-00002 - University Highlands

DCA Amendment Number: _____ (DCA Official Use)

PLEASE PRINT CLEARLY

Citizen Name	Address, City, State, Zip Code	Check (√) Appropriate Response(s)		Identify Amendment which is of Interest
		Written Comment	Spoken Comment	
No Signatures Received				

**CPA2010-01
FLORIDA GULF COAST
RESEARCH AND
TECHNOLOGY PARK
DRI AMENDMENT TO THE**

LEE COUNTY COMPREHENSIVE PLAN

THE LEE PLAN

Privately Sponsored Application and Staff Analysis

DCA Transmittal Document

*Lee County Planning Division
1500 Monroe Street
P.O. Box 398
Fort Myers, FL 33902-0398
(239) 533-8585*

June 23, 2010

**LEE COUNTY
DIVISION OF PLANNING
STAFF REPORT FOR
COMPREHENSIVE PLAN AMENDMENT
CPA2010-01**

☒

Text Amendment

☐

Map Amendment

	This Document Contains the Following Reviews:
✓	Staff Review
✓	Local Planning Agency Review and Recommendation
✓	Board of County Commissioners Hearing for Transmittal
	Staff Response to the DCA Objections, Recommendations, and Comments (ORC) Report
	Board of County Commissioners Hearing for Adoption

STAFF REPORT PREPARATION DATE: June 14, 2010

PART I - BACKGROUND AND STAFF RECOMMENDATION

A. SUMMARY OF APPLICATION

1. APPLICANT/REPRESENTATIVES:

The Benderson Development Corporation, LLC/Represented by Neale Montgomery of Pavese Law Firm and Wayne Arnold of Q. Grady Minor and Assoc, P.A.

2. REQUEST:

Amend the Tradeport future land use category to permit community and regional retail commercial development on 103 acres at the northeast quadrant of the Ben Hill Griffin Parkway and Alico Road. Amend Policy 2.12.2 to add public and quasi-public community facilities and recreational uses within the Tradeport future land use category.

B. STAFF RECOMMENDATION AND FINDINGS OF FACT SUMMARY

1. RECOMMENDATION:

Planning staff recommends that the Board of County Commissioners *transmit* the proposed amendment to the Lee Plan, as revised by staff.

2. BASIS AND RECOMMENDED FINDINGS OF FACT:

- The subject site is located within the Tradeport and Wetlands future land use categories.

- The existing language of the Tradeport Future Land Use Category provides economically viable uses of the site.
- Tradeport permitted uses include light manufacturing or assembly, warehousing, and distribution facilities, research and development activities, laboratories, ground transportation and airport-related terminals or transfer facilities, hotels/motels, meeting facilities, and office uses.
- If approved through the Planned Development process, ancillary retail and corner store commercial uses are permitted within the Tradeport Future Land Use Category.
- Ancillary retail and corner store commercial uses are not well defined within the Tradeport future land use category.
- Approximately 4.5 million square feet of retail commercial uses currently exist or have the required zoning approvals within one mile of the subject site.
- Approximately 1.9 million square feet of commercial office uses currently exist or have the required zoning approvals within one mile of the subject site.
- Approximately 2,300 hotel/motel rooms currently exist or have the required zoning approvals within one mile of the subject site.
- The applicant has not demonstrated a County need to modify the Tradeport future land use category to permit 700,000 square feet of stand alone retail use on the subject site.
- The proposed text change to allow regional and community retail commercial uses on approximately 103 acres within the Gulf Coast Technology Center could displace the traditional Tradeport uses and may be viewed as a precedent by other property owners in the Tradeport area.
- Industrial and research and development uses are typically more difficult than retail commercial uses to locate in a manner that is consistent with the Lee Plan.
- The current location and intent of the future land use categories that allow industrial, research and development uses should be protected for future industrial and research and development activities.

C. PROJECT SUMMARY DISCUSSION:

The Gulf Coast Technology Center Comprehensive Plan Amendment was filed by the Benderson Development Corporation on January 11, 2010. The amendment proposes to change Policy 1.2.2, the Tradeport descriptor policy, to allow community and regional retail commercial development on approximately 103 acres at the northeast corner of Alico Road and Ben Hill Griffin Parkway. The applicant is also proposing to amend Policy 2.12.2 to allow public and quasi-public community facilities and recreational uses within the Tradeport Future Land Use Category as part of a Planned Development zoning approval. The 103 acres that is affected by the proposed amendment is part of a larger Development of Regional Impact (DRI) that consists of approximately 727 acres that the applicant is proposing to be used predominantly for light

industrial and research and development uses. The DRI's northern boundary is the boundary of the Southwest Florida International Airport.

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 and research and development components of the DRI. However, the commercial uses would be limited to those that are ancillary to the uses currently allowed within 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 the proposed amendment, to include 700,000 square feet of retail commercial and a 240 room hotel, on the 103 acres, that would be in addition to the permitted ancillary and cornerstore uses that are allowed in the Tradeport future land use category.

D. BACKGROUND INFORMATION

1. EXISTING CONDITIONS:

SIZE OF PROPERTY: 103 ± Acres.

PROPERTY LOCATION: The approximate 103 acres is located at the northeast corner of Alico Road and Ben Hill Griffin Parkway.

EXISTING USE OF LAND: Vacant, Pasture, and Wetlands.

CURRENT ZONING: AG-2.

CURRENT FUTURE LAND USE CATEGORY: Tradeport (50.59 acres); and Wetlands (52.41 acres).*

*Staff notes that these acreages are based on the current Future Land Use Map and may not necessarily reflect jurisdictional wetlands.

2. INFRASTRUCTURE AND SERVICES:

FIRE: San Carlos Fire and Rescue District.

EMS: Lee County EMS service area.

LAW ENFORCEMENT: Lee County Sheriff's Office.

SOLID WASTE: The subject site is located in Solid Waste Service Area 3.

MASS TRANSIT: Lee Tran provides regular service to the Gulf Coast Town Center and express service to the intersection of Alico Road and Ben Hill Griffin Parkway.

WATER AND SEWER: The subject site is within the Lee County water and sewer Future Service Areas as identified on Maps 6 and 7 of the Lee Plan.

3. **COMPREHENSIVE PLAN BACKGROUND DISCUSSION:**

The subject property was designated Open Lands and Wetlands by the original Lee County Future Land Use Map, adopted in 1984. Open Lands 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 category name was utilized again in 1994 applying only to land north of the Caloosahatchee River.

The property was changed to DR/GR and Wetlands in 1990. The DR/GR was a new category that was applied to all uplands that were currently designated Rural or Open Lands that lie north of the future urban areas of Bonita Springs, east of I-75, southeast of the Southwest Florida International Airport, and south of State Route 82. The land use designation was also applied to other specific areas of Lee County. In addition to reducing the countywide density, the DR/GR land use designation's intent was to protect and restrict development on areas that provide substantial recharge to aquifers most suitable for future wellfield development.

Following an Administrative Hearing and a Final Order by the Governor and Cabinet, the subject site's future land use category was changed from Density Reduction / Groundwater Recharge and Wetlands to the Airport Commerce and Wetlands on July 25, 1996 (effective date). The Airport Commerce Future Land Use Category was subsequently renamed the Tradeport Future Land Use Category on December 10, 2004 (effective date) following a request of the Lee County Port Authority.

PART II - STAFF ANALYSIS

A. STAFF DISCUSSION

The applicant, "Benderson Development Corporation, LLC," on January 11, 2010, filed a Lee Plan text amendment to accommodate "community and regional" retail commercial uses that would be limited to the subject 103 acre site. The applicant proposes, at build-out, 700,000 square feet of non-ancillary retail commercial uses and 240 hotel rooms. The application materials provide a brief summary of the type of development that is being proposed:

The applicant is submitting this privately initiated Lee Plan amendment in conjunction with a Development of Regional Impact (DRI) application. The DRI encompasses approximately 727+/- acres of property located at the northeast quadrant of the intersection of Ben Hill Griffin Parkway and Alico Road. The property which is the subject of the Lee Plan amendment is approximately 103+/- and is depicted on the attached general location exhibit. The amendment proposes to modify the Tradeport Land Use category, Policy 1.2.2 by establishing criteria under which community and regional retail commercial development may occur in conjunction with industrial, office and research and development if developed as a single project which provides for economic development opportunities. The regional and community commercial uses would be in addition to the cornerstore commercial land uses currently permitted in this land use category.

Although not stated within the request summary provided above, it should be noted that the applicant is also proposing an amendment to Policy 2.12.2 that would accommodate public and quasi-public community facilities and recreational uses within the Tradeport Future Land Use Category as part of a Planned Development zoning approval. This amendment is not limited to the subject site, but would, as proposed by the applicant, be applicable to all lands within the Tradeport Future Land Use Category.

The amendments proposed by the applicants to Policy 1.2.2 are as follows:

POLICY 1.2.2: The Tradeport areas are commercial and industrial lands adjacent to the airport needed to accommodate projected growth through the year 2030. These areas will include developments consisting of light manufacturing or assembly, warehousing, and distribution facilities; research and development activities; laboratories; ground transportation and airport-related terminals or transfer facilities; hotels/motels, meeting facilities; and office uses. Ancillary retail and Corner Store commercial uses, intended to support the surrounding business and industrial land uses, are allowed if they are part of a Planned Development. Future development in this category is encouraged to include a mixture of land uses as described in Policy 2.12.2. Residential uses, other than bona fide caretaker residences, are not permitted in this category except to the extent provided in Chapter XIII of the Plan. Caretaker residences are not permitted in the Airport Noise Zone B. Because this area is located within the Six Mile Cypress Basin and is also a primary point of entry into Lee County, special environmental and design review guidelines will be applied to its development to maintain the appearance of this area as a primary point of entry into Lee County. Property in Section 1 and the east ½ of Section 2, Township 46 South, Range 25 East, and in Section 6, Township 46 South, Range 26 East, must be rezoned to a planned development zoning category prior to any development other than the construction of essential public services. During the rezoning process, the best environmental management practices identified on pages 43 and 44 of the July 28, 1993 Henigar & Ray study entitled, "Groundwater Resource Protection Study" will be rebuttably presumed to be necessary to protect potential groundwater resources in the area.

Community and Regional retail commercial uses are permitted in the Tradeport Future Land Use Category, in addition to the Corner Store commercial, under limited circumstances. Non-ancillary community and regional retail commercial are permitted in those instances when there is an adequate transportation network, an adequate market, and where the retail is part of a larger mixed use development that is capable of meeting the economic diversification needs of the county. The community and regional commercial is permitted in the Tradeport Future Land Use Category on approximately 103 acres of property located at the northeast quadrant of the intersection of Ben Hill Griffin Parkway and Alico Road, in Sections 1 and 2, Township 46 South, Range 25 East. The community and regional commercial will be permitted in accordance with the following criteria:

1. The regional and community retail commercial uses must be approved as part of a Development of Regional Impact.
2. The regional and community retail commercial uses must be approved as part of Mixed Planned Development or as a Commercial Planned Development/Industrial Planned Development.

3. The regional and community retail commercial uses may not exceed 15% of the total retail, office, and Industrial square footage of the Development of Regional Impact.
4. The office, industrial, hotel, or other uses within the Development of Regional Impact must be able to access the community and regional retail commercial without the need to utilize the external road network.
5. The community and regional retail commercial uses will not exceed an FAR of 0.16.

The amendments proposed by the applicants to Policy 1.2.2 are as follows:

Policy 2.12.2: Future development within the Tradeport and Industrial Development future land use categories is strongly encouraged to be designed to include a mixture of research and development, industrial, and related offices uses, where appropriate. Public and quasi-public, community facilities and recreational uses shall also be permitted where appropriate and reviewed as part of a planned development.

COMMON GOAL

Staff has met with the Benderson development team several times while preparing this staff report. Staff notes that there is a common goal of both the Lee County Department of Community Development and the Benderson Development Corporation. Both parties want the Tradeport to be a vibrant area, and see it as essential to diversifying Lee County's economy. County staff appreciates that the Benderson Development Corporation is a nationally recognized company with a home base on Florida's west coast. Staff also appreciates that the Benderson development corporation is very enthusiastic about their vision for the subject site and how it will help to achieve the desired goals. Staff will continue meetings and negotiations with the developer.

SURROUNDING ZONING, LAND USES, AND FUTURE LAND USE DESIGNATIONS

The application materials include a discussion of surrounding zoning and land uses. The surrounding Future Land Use categories consist of Airport, Tradeport, Density Reduction/Groundwater Resource (DR/GR), and University Community. Airport designated lands occur to the north of the 727 acre DRI, and are not directly adjacent to the subject site. The Tradeport designation is directly adjacent to the subject site on the north and east and is also located west across the Alico Road right-of-way. Density Reduction/Groundwater Resource and University Community lands are located south of the proposal.

The application materials and staff review reveal a variety of DRIs, Developments of County Impacts, and planned developments in close proximity to the subject site.

South of the subject property are lands within the Density Reduction/Groundwater Resource Future Land Use Category. The property directly south of the site is a former aggregate mine site with AG-2 and IL zoning. The old mine site is the subject of a separate proposed Lee Plan Amendment known as Alico West. The applicant in this case is proposing to redesignate DR/GR lands to University Community. Also south of the subject site are lands that are currently in the University Community future land use category and are a commercial component of the Miromar Lakes DRI with approval for up to 250,000 square feet of retail uses, 340,000 square feet of office uses, and 450 hotel rooms.

Southwest of the subject site, on the opposite corner of the Alico Road and Ben Hill Griffin Parkway intersection is a large regional retail shopping center known as Gulf Coast Town Center. This property

was zoned as a Commercial Planned Development. The Gulf Coast Town Center has approvals for 1,916,000 square feet of retail uses and 250 hotel rooms, and is nearing buildout.

West of the subject site is the Jetway Tradeport Mixed Use Planned Development, which is currently under construction and has approvals for 120,000 square feet of commercial retail space, 75,000 square feet of commercial office space and 300 hotel rooms. This development is located in the Tradeport and Industrial Commercial Interchange future land use categories.

North of the subject site is the Southwest Florida International Airport. The Airport approvals include 225,000 square feet of office uses and 300 hotel rooms. The County is hoping to foster research and development activities within this “Madden Research Loop” on the Airport property.

East of the subject site is the Premier Airport Park and other vacant Tradeport properties.

INTERNAL CONSISTENCY WITH THE LEE PLAN

Policy 1.2.2 of the Lee Plan , the descriptor policy of the Tradeport future land use category was previously shown along with the applicant’s proposed changes.

There are also additional provisions that are applicable to the Tradeport future land use category found in Policy 2.12.2. The existing text of Policy 2.12.2 was also shown with the applicant’s proposed changes.

The proposed Lee Plan amendment is requesting to make revisions to the policies identified above that would allow for community and regional retail commercial development in addition to the corner store and ancillary commercial land uses that are currently permitted within the future land use category. This change is necessary to accommodate the development that is being proposed in a companion Development of Regional Impact (DRI) application because the proposed development is inconsistent with the existing language of Policies 1.2.2 and 2.12.2. The development that the applicant is seeking to accommodate includes 700,000 square feet of retail commercial uses, which is clearly within the range of a Regional Commercial Center as specified by Policy 6.1.2 of the Lee Plan. The Tradeport future land use category is seen as an important asset as Lee County strives to diversify its economy to be less reliant on service industries and retail commercial uses. Staff finds that the proposed development is not consistent with the Policies 1.2.2 and 2.12.2 of the Lee Plan.

Planning staff strongly believes that Lee County should protect the integrity of the Tradeport future land use category.

The proposed text amendments to Policy 2.12.2 would allow public and quasi-public, community facilities and recreational uses. Public uses are allowed in the Tradeport category, as it is currently allowed in all land use categories by Policy 2.1.3 of the Lee Plan. Public recreational uses are also allowed by Policy 2.1.3.

The intent of the Tradeport category as stated in Policy 1.2.2 is to provide for “developments consisting of light manufacturing or assembly, warehousing, and distribution facilities; research and development activities; laboratories; ground transportation and airport-related terminals or transfer facilities; hotels/motels, meeting facilities; and office uses.” Also allowed with in the Tradeport future land use category is corner-store retail and ancillary commercial uses that are intended to support the surrounding business and industrial land uses. The intent of the applicant: to allow for community and regional retail commercial development would allow for an intense level of retail commercial development that is not

ancillary to the intended Tradeport Uses. This is inconsistent with the intent of the Tradeport future land use category. During the formation and amendment of the Tradeport future land use category, then known as the Airport Commerce future land use category, Lee County found that these lands were well suited for industrial development. The following is an excerpt from the “Response to the ORC, Airport Commerce Land Use Category”, dated October 21, 1994, (Attached) that favored placing these lands within the Tradeport future land use category:

“In their studies, both the property owner, Alico, Inc., and the Port Authority looked to the experience of the older airports for guidance. Activities such as shipping and freight forwarding are often located on property adjacent to airports. Spin-off operations including warehouse and delivery services, transfer facilities, office complexes, high-tech electronics and communications companies and a variety of other business services are often located on property identically located as the subject property. Other business that are (sic) do not necessarily rely directly on the airport for their operation, located near an airport because they value the prestige, services and/or the accessibility of a location near an airport for their customers and workers. Table 1 presents the different type of land uses attracted to airports (Please see attached “Response to ORC”, page 22 for Table 1). Providing for these uses on suitably located property is consistent with the requirements of the industrial needs study completed by Tom Roberts for Lee County.

Lee County needs to ensure that whatever development occurs on the subject property is compatible with the airport and that additional Airport Commerce acreage in the appropriate location is not precluded in the future. It would not be in anyone's best interest to have this area develop into incompatible high end residential uses, such as happened with the Lake Nona development adjacent to the Orlando Airport.”

The above passage specifically discusses that areas that are suitable for industrial development next to airports should not be developed with “incompatible high end residential uses.” There are two reasons for this. The first is the inherent conflicts that are created when siting uses next to an airport or industrial area such as noise and air quality. The second reason which is equally important, is the limited lands that are appropriate for industrial development. During the creation of the Tradeport (Airport Commerce) future land use category staff found that “Lee County needs to ensure that whatever development occurs on the subject property is compatible with the airport and that additional Airport Commerce acreage in the appropriate location is not precluded in the future.” Allowing the development of a regional retail commercial destination shopping center would preclude development that is consistent with the Tradeport future land use category. The limited areas that are adjacent to the Southwest Florida International Airport need to be protected from inappropriate uses.

Lee Plan Industrial Siting Criteria

The general nature of siting industrial and Tradeport uses depends on the specific requirements of Policies 5.1.5 and 7.1.9. The siting of industrial uses in a manner that is consistent with the Lee Plan is more difficult than siting retail commercial centers. Policy 5.1.5 reads as follows:

POLICY 5.1.5: Protect existing and future residential areas from any encroachment of uses that are potentially destructive to the character and integrity of the residential environment. Requests for conventional rezonings will be denied in the event that the buffers provided in Chapter 10 of

the Land Development Code are not adequate to address potentially incompatible uses in a satisfactory manner. If such uses are proposed in the form of a planned development or special exception and generally applicable development regulations are deemed to be inadequate, conditions will be attached to minimize or eliminate the potential impacts or, where no adequate conditions can be devised, the application will be denied altogether. The Land Development Code will continue to require appropriate buffers for new developments.

Policy 7.1.9 reads states:

POLICY 7.1.9: Industrial development will not be permitted if it allows industrial traffic to travel through predominantly residential areas.

One of the major premises of the Lee Plan is the protection of the character of residential communities from incompatible uses. This has necessitated the inclusion of the policies identified above. It is more difficult to identify appropriate locations for industrial uses than it is for retail commercial and office uses.

Siting of industrial land uses is also difficult because of the specific needs that are required for typical industrial uses. This has been contemplated by the Lee Plan as evidenced in Policy 7.1.3 which reads as follows:

POLICY 7.1.3: Industrial land uses must be located in areas appropriate to their special needs and constraints, including, but not limited to, considerations of: topography; choice and flexibility in site selection; access by truck, air, deep water, and rail; commuter access from home-to-work trips; and utilities; greenbelt and other amenities; air and water quality considerations; proximity to supportive and related land uses; and compatibility with neighboring uses.

In the economic analysis submitted by the applicant the author makes the statement:

The changing employment picture in Lee County, and in the Construction sector in particular, does more than challenge calls for additional industrial land accumulation. It renders them moot.

The currently designated industrial and Tradeport lands are in fact the only such lands the County will ever have. As stated previously, these land uses are extremely difficult to place in an already developed landscape. Also, as articulated in Policy 7.1.3 access to the airport and the interstate highway system, and the services that they provide, is important to industrial uses. Staff's position in this case is not to call for additional industrial lands, but to protect the limited industrial lands that we have in proximity to the airport and Interstate 75. It should be noted that this amendment is seeking to effectively remove land from an already designated tradeport area.

Resisting the Transformation of Industrial Lands

The following is an excerpt from the Tom Roberts Industrial Land Use Needs study prepared for Lee County in conjunction with the Comprehensive Plan. It predicted future attempts to allow non-industrial uses within areas that have been designated for industrial uses:

Whenever a proposal comes along to use industrially designated land for some non-industrial use, it will be tempting to permit it, on the grounds that the County has a great deal of vacant land and that will continue to be the case for many years. But, ...the amount of land that is needed to

provide for eventual industrial use is a tiny percentage of the County's total land area, and it is very important that it be available when and where it is needed.

Chapin and Kaiser stress the importance of industrial land use planning by stating that it should receive top priority, preceded only by environmentally critical open space.

The Tom Roberts study also concludes the following:

Just as important as providing an adequate amount of industrial district land is the need to save it in the right places, because of industry's special locational requirements.

Ironically, if Lee County errs in its long-term land use planning, it is less likely to be in the category of environmentally critical areas. That issue, while still shaky, has attracted strong public and governmental attention, and its importance is graphic. The greater risk is in the area of industrial land use planning, because the long-term economic and fiscal implications of being short-sighted in the preservation of enough good industrial sites seem remote and elusive today, and the problems faced by older retirement/tourism centers like Miami Beach and St. Petersburg seem far away.

Staff agrees with these earlier assessments, and does not believe that the County should make changes to the Lee Plan that would weaken the intent of the Tradeport future land use category by allowing the development of a regional retail commercial shopping center.

The applicant believes that the proposed Regional Retail Commercial center will act as a catalyst for the light manufacturing or assembly, warehousing, and distribution facilities; research and development activities; laboratories; ground transportation and airport-related terminals or transfer facilities; hotels/motels, meeting facilities; or office uses that are intended for the Tradeport future land use category. The applicant has provided an analysis prepared by Snaith Economic Advisory Services to support this claim. The analysis provided by the applicant states that "the addition of a hotel and retail amenities to the southwest parcel of the Research and technology Park will make the remaining industrial space in the rest of the Park more attractive to the types (of) industrial and office tenants that the county seeks to attract."

Staff does not believe the proposed regional and community retail development would provide a catalyst for development consistent with the Tradeport category. The Tradeport category has undergone several modifications to broaden the allowable uses and to allow additional services and amenities through the Planned Development rezoning process. Review of Appendix C to the applicants economic analysis (*Characteristics and Trends in North American Research Parks: 21st Century Directions*, by Battelle Technology Partnership Practice, October 2007, Developed in cooperation with the Association of University Research Parks) stresses the need for services and amenities in association with research parks. In no place does the report promote a need for regional and community commercial retail in association with such parks. A portion of the results of a survey of 122 research parks is included in this appendix. A pie chart on page 7 of that document indicates that the average retail component of these parks is around 4.5 percent of the tenants of the parks. The application proposes 15 percent of the entire floor area of the park, including the office, industrial, and retail. This amount of commercial far exceeds any services and amenities needs.

The application's economic analysis cites a development in Alabama, the Cummings Research Park as a potential blueprint for the Gulf Coast Research and Technology Park. This park is associated with the University of Alabama at Huntsville. The park contains approximately 3,843 acres and is the second largest research park in the United States and the fourth largest park in the world. There is an area of this research park called the Bridge Street Town Center. It is a mostly retail center developed somewhat as a main street lined with shops and restaurants. The area of the center is approximately 90 acres. This equates to about 2.3 percent of the project area.

The following types of commercial development are available near the subject site:

- Approximately 4.5 million square feet of retail commercial uses currently exist or have the required zoning approvals within one mile of the subject site.
- Approximately 1.9 million square feet of commercial office uses currently exist or have the required zoning approvals within one mile of the subject site.
- Approximately 2,300 hotel/motel rooms currently exist or have the required zoning approvals within one mile of the subject site.

A more detailed analysis of the developed and approved uses in the surrounding area is shown on the following table:

Approved and Existing Development			
Development	Retail	Office	Hotel
	(Square feet)	(Square feet)	(Rooms)
East of I-75			
Southwest Florida Inter. Airport		225,000	300
Airport Interstate Commerce Park	175,000	131,000	
Miromar Lakes MPD	250,000	340,000	450
Gulf Coast Town Center	1,916,000		250
University Plaza	160,000	140,000	120
Airport South Interchange	300,000		172
Jetway Tradeport	120,000	75,000	300
Airport Technology Center	69,000	200,000	115
Alico Airpark Center	240,000		
Subtotal	3,230,000	1,111,000	1,707
West of I-75			
Alico Crossroads Center	300,000	51,000	200
Vintage Commerce Center	270,000	30,000	
Alico Interchange Park	696,000	750,000	400
Subtotal	1,266,000	831,000	600

Total (Approximately 1 mile along Alico Road)	4,496,000	1,942,000	2,307
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The Tradeport future land use category requirements have been recently modified to allow Corner Store commercial uses, and remove some of the restrictions that applied to the ancillary retail commercial uses in CPA2007-00055. Staff, in CPA2007-00055 concluded that the allowance of ancillary commercial uses and cornerstores within the Tradeport future land use category as proposed in that Lee Plan amendment was needed to allow for the development of Research and Development parks sought by the Economic Development Office in the Industrial Development and Tradeport future land use categories. This view was supported by the *Commercial/Industrial Land Use Analysis*, completed by Basile Baumann Prost & Associates for Lee County. Unfortunately, when the Tradeport future land use category was revised a clear definition or amount of appropriate ancillary and corner store uses was not provided. Even though the Lee Plan does not provide a clear definition of these uses staff finds that the amount and type of retail commercial uses that are currently approved to be developed within the Tradeport future land use category is appropriate.

Approved and Existing Commercial Development in Tradeport FLUC			
Development	Retail (Square feet)	Office (Square feet)	Total Acres
Southwest Florida Inter. Commerce Park	6,000	180,000	207.50
Airport Interstate Commerce Park	175,000	131,000	321.94
Alico Airpark Center	50,000	190,000	240.96
Premier Airport Park	0	0	225.71
Airport Technology Center	69,000	200,000	90.46
Airport Crossings	75,000	295,000	82.43
Arlington Commerce Park	50,000	160,000	80.57
Total	425,000	1,156,000	1,249.57

The types of retail commercial uses that were approved in the above listed developments within the Tradeport future land use category include the following:

Consumption on premises - in conjunction with a restaurant; factory outlets (point of manufacture only); health club or spa; all types of restaurants; banks and financial establishments; retail and wholesale sales; convenience food and beverage; food stores, hardware stores, fueling stations; automatic teller machine; autoparts store; bar/cocktail lounge; boat parts store; pharmacy; gift shops; laundry and dry cleaning; nightclubs; parcel and express services; package store; specialty retail shops; vehicle and equipment dealers (Group IV and V); hardware store; used merchandise; variety store; paint stores; commercial recreation facilities; drive through facilities; and photo finishing.

Past and Future Precedents

It is important to point out that the existence and approval of retail commercial developments at the southeast, and southwest corner of the intersection of Alico Road and Ben Hill Griffin Parkway does not dictate the development that is to be expected at the northeast quadrant of the intersection. This is articulated in Policy 6.1.10 of the Lee Plan, which reads as follows:

POLICY 6.1.10: The approval or existence of commercial development on one corner of an intersection will not dictate the development of all corners for commercial development, nor does the existence of commercial development on an arterial or collector road dictate that all frontage must be similarly used.

It should also be noted that the retail commercial developments at the southeast and southwest corner of the intersection of Alico Road and Ben Hill Griffin Parkway were approved in the University Community future land use category.

The land use planning issues at stake for Lee County are bigger than the 103 acres that make up the subject site. Allowing Industrial or Tradeport lands to be used for stand alone regional retail commercial uses at this location would set a precedent for other lands within the Lee County's Tradeport and Industrial future land use categories.

TRANSPORTATION/TRAFFIC CIRCULATION IMPACTS

The Department of Transportation has reviewed the above-referenced privately-initiated comprehensive plan amendment, submitted in conjunction with a DRI application, to modify the "Tradeport" land use designation for approximately 103 acres on the north side of Alico Road east of Ben Hill Griffin Parkway to allow significantly more commercial development than otherwise would be allowed. The applicant has asked that this change allow an additional 700,000 square feet of regional and community commercial/retail space by 2030 for purposes of the traffic analysis (half of that for the 2014 analysis). A significant number of roadways in the area are projected to fail by 2030, both with and without the land use modification, and there is no specific mitigation plan to address those failures or larger public benefit being provided by the applicant to off-set the failures and justify this modification of critical "Tradeport" lands in the heart of the "Research Diamond." Therefore, DOT staff recommends the amendment not be transmitted.

Analysis of Impacts

In order to analyze the impact of this proposal on the Lee County MPO's 2030 Financially Feasible Plan, the applicant's consultant added the employment associated with 700,000 square feet of commercial (1,750 employees) to the zonal data for existing traffic analysis zone (TAZ) 1387, and ran the FSUTMS travel demand model. Based on the model runs on the financially feasible plan network, six roadway segments within a 3-mile radius of the site are projected to exceed their adopted level of service standard in 2030 with or without this amendment. They are:

Alico Road from Three Oaks Parkway to I-75

Ben Hill Griffin Parkway from Alico Road to FGCTRP Entrance

Ben Hill Griffin Parkway from FGCTRP Entrance to Terminal Access Road

Treeline Avenue from Terminal Access Road to Daniels Parkway

I-75 from Corkscrew Road to Alico Road

I-75 from Alico Road to Daniels Parkway

Applicant's Proposed Mitigation

The applicant's consultant estimates that the project will generate \$7.7 million in road impact fees under today's rate schedule, and suggests that these payments can be used to fund whatever improvements are found to be necessary to support general growth in the area. The DRI proportionate share amount has not yet been determined, as the DRI analysis is not yet sufficient and the DRI impacts not yet agreed upon. The consultant suggests that since this development is not currently anticipated in future growth forecasts

that all impact fees generated would be new revenues beyond the 2030 revenue forecasts. That approach does not consider that future road impact fee revenue forecasts are not site-specific, and does not really address the issue of the needed improvements being financially feasible and reasonably expected to be in place not only when the impacts of the development arrive, but in the horizon year of the plan. It also does not account for the potential reduction or repeal of road impact fees in the future, options that have been discussed in the current economic downturn.

Needed Infrastructure Commitments

Section B.1.e of the County's comprehensive plan amendment application states that "An inability to accommodate the necessary modifications within the financially feasible limits of the plan will be a basis for denial of the requested land use change." Normally, the County would look for a specific financial commitment from an applicant to make the necessary improvements by the 2030 time frame, otherwise DOT staff would recommend denial under these circumstances. Without a financial commitment, we cannot say that there is sufficient infrastructure planned to accommodate future growth, including the amended land use. There have been some limited instances where the County has allowed such amendments to move forward based on their specific circumstances; examples include there being no real roadway solution and the applicant making a commitment to fund alternative modes of transportation, or there being a site-specific condition put in the comprehensive plan that limits the amount of development until the needed improvements are incorporated into the financially feasible plan.

Also the MPO's long range plan is currently being updated and extended to the year 2035, so the list of improvements that are or will be in the financially feasible plan is somewhat in flux. However, in this case, we are looking at a proposed land use modification in an area where there are expected to be significant roadway improvement needs, and the applicant has offered the payment of impact fees and no other solution.

Based on the MPO's 2030 Plan, as adopted in December, 2005 and last amended in March, 2006, the needed improvements and their costs are:

<u>Segment</u>	<u>Current</u>	<u>Needed</u>	<u>Cost</u>
Alico Rd., Three Oaks-I-75	6L	Alico Expwy.	\$603,111,223
Ben Hill Griffin Pkwy, Alico Rd.-Terminal	4L	I-75 10L	See below
Treeline Ave, Terminal-Daniels	4L	I-75 10L	See below
I-75, Corkscrew.-Alico	6L	12L	\$77,514,291*
I-75, Alico-Daniels	6L	10L	<u>\$78,302,569*</u>
TOTAL			\$758,928,083

**Pro-rated cost of larger project based on segment length*

The MPO plan does not identify improvements to Ben Hill Griffin Parkway/Treeline Avenue between Alico Road and Daniels Parkway, because the widening of this road is not anticipated to be needed once I-75 is widened to ten lanes. One complicating factor in regards to the future widening of I-75 is that the Florida Legislature established the Southwest Florida Expressway Authority in 2003 and gave it the specific objective of expanding the interstate through the addition of tolled express lanes in portions of Lee and Collier Counties. Both the Expressway Authority and the Florida Turnpike Enterprise conducted preliminary toll feasibility studies and determined that a 10-lane interstate project could be supported by toll revenues and financially feasible, but only if there were 6 tolled express lanes and 4 non-tolled general use lanes. At the same time, FDOT secured Federal funding to move forward with 6-laning I-75 from Golden Gate Parkway in Collier County to Colonial Boulevard in Lee County. This project was recently completed. The added lanes were not tolled, and it may be difficult in the future (legally and politically)

to toll lanes that are not specialty lanes (for example, HOV lanes) or were not tolled in the past. That means the implementation of a 10-lane project made up of 6 tolled express lanes and 4 non-tolled general use lanes may not be feasible in the future, and other configurations may not be feasible as toll-supported projects. With the recent completion of the 6-laning and the reduction in demand on the interstate due to the current economic downturn, the need for additional lanes has been pushed farther into the future. The Expressway Authority has recently decided to pursue its dissolution.

Alico Road

The FSUTMS computerized travel demand model used to analyze the impact of this comprehensive plan change is a system-wide model that sometimes does not realistically reflect what might happen at a given site. This plan amendment only affects a portion of the Florida Gulf Coast Technology & Research Park DRI, adding 700,000 square feet of commercial to the growth parameters for TAZ 1387 with centroid connections from the TAZ to both Ben Hill Griffin Parkway and Alico Road. The model has loaded the majority of the trips from this TAZ to Ben Hill Griffin Parkway, which results in the two-lane piece of Alico Road east of Ben Hill Griffin Parkway not being shown as failing in the 2030 horizon. However, the TAZ 1387 growth parameters don't include the full level of development proposed for the Florida Gulf Coast Technology & Research Park DRI, with a buildout year of 2022. The model also doesn't reflect the access set-up envisioned in the DRI Master Plan, with one driveway connection to Ben Hill Griffin Parkway and seven driveway connections proposed onto Alico Road (six of which access the 103-acre parcel that is the subject of this plan amendment). Other comprehensive plan amendments, zoning and local development order approvals in the area have shown the two-lane piece of Alico Road between Ben Hill Griffin Parkway and Airport Haul Road as failing in the not-too-distant future with the addition of their development traffic. It is reasonable to expect that this DRI will also have that effect. The conversion of light industrial lands in the Tradeport category to something that would accommodate regional and community commercial development (and thereby increasing the trip generation potential) would only exacerbate that potential problem.

Alico Road is also an industrial corridor with significant truck traffic, including the majority of the mining traffic coming from the limited mining areas off of Alico Road allowed by the DR/GR plan amendments and code changes. Modifying 103 acres of Tradeport to allow more commercial development would cause more of a mixing of traffic types than we would otherwise expect, and could create the kind of safety concerns that are frequently noted by users of Corkscrew Road to the south, particularly without the widening of Alico Road. On a two-lane undivided road segment such as Alico Road between Ben Hill Griffin Parkway and Airport Haul Road, there is no median so there is no limitation on the movements coming in and out of the seven entrances the applicant has proposed. This could create numerous conflict points with fully-loaded trucks that have difficulty slowing down, in terms of left turns across their path or right turns in front of them.

The MPO's 2030 Needs Plan does not include the widening of Alico Road east of Ben Hill Griffin Parkway; instead it includes the Alico Expressway to the north as a parallel improvement that addresses the demand. The Alico Expressway now appears to be an unlikely improvement given development patterns in the area, and LCDOT staff expects that the on-going update of the MPO plan to 2035 will drop the Expressway project and add the widening of existing Alico Road and its extension up to SR 82 (which was the subject of a recent County corridor alignment study). Whether the widening of Alico Road ends up in the new 2035 Financially Feasible Plan or the Needs Plan remains to be seen. However, in recognition of the importance of widening Alico Road in encouraging alternative energy research and development activities in this area and eliminating obstacles to their establishment, the County is proposing to fund the preliminary engineering/design/permitting effort for the four-laning of Alico Road

from Ben Hill Griffin Parkway to Airport Haul Road in its CIP. Unfortunately, severely declining transportation revenues do not allow the County to fund the right-of-way and construction phases at this time.

Whether through this comprehensive plan amendment process (if approved) or the DRI process, the applicant should be required to address the need for future widening of Alico Road between Ben Hill Griffin Parkway and Airport Haul Road, the entire length of which this applicant owns frontage. The applicant could commit to pipeline his DRI proportionate share to the improvements, and/or provide right-of-way for the roadway widening and/or water treatment, or make a commitment to take the roadway drainage into the site drainage. The various land owners have not yet developed a cooperative approach to dealing with the issue. The County may consider the establishment of some sort of funding mechanism for the property owners in the area to help pay for the road widening and other infrastructure needs (i.e., water and sewer lines), such as an MSTU. Such a mechanism could allow for credits against future impact fees or DRI proportionate share obligations. This property owner should be required to participate in any such funding mechanism established by the County in the future.

Summary

Consistent with the requirements of the County's comprehensive plan amendment application, the lack of a specific financial commitment from the applicant to make the necessary roadway improvements by the 2030 time frame causes LCDOT staff to recommend not transmitting this amendment.

LEE COUNTY PORT AUTHORITY COMMENTS

The Lee County Port Authority Provided the following comments:

A parallel south runway is planned northeast of this property. The extended centerline of this future runway will pass just to the north of the CPA2010-00001 site - and directly over the remaining industrial/office portion of the Florida Gulf Coast Technology and Research Park development. The existing and planned Lee County noise overlay zones account for the planned runway at the Southwest Florida International Airport (SWFIA). When the second runway is in place, there will be significant numbers of low flying aircraft near the proposed development.

The industrial, retail, hotel, and office land uses within the boundary of the proposed Lee Plan Amendment appear to be consistent with those uses recommended for noise zones established in the Port Authority's most recent Federal Aviation Regulations (F.A.R.) Part 150 Noise and Land Use Compatibility Study approved by the Federal Aviation Administration (FAA) in 2006. Plans for the Lee Plan Amendment site are also be consistent with the current interim noise overlay zones adopted by Lee County on August 23, 2005. Our concerns center on the following issues which we ask you to consider:

Potential Height Obstructions – *Future construction at the site must comply with the following regulations for all structures proposed on the site, including antenna towers and temporary construction equipment:*

- *Federal Aviation Regulations (FAR) Part 77 "Objects Affecting Navigable Airspace;"*
- *Florida Statutes Chapter 333, "Airport Zoning;"*
- *Lee County Land Development Code (LDC) Section 34-001 and seq.*

The allowable heights for the hotel other permanent structures and temporary (construction) equipment will be dependent on review and approval by the LCPA and potentially the FDOT and FAA.

Hazardous Wildlife Attractants – *Littoral lake slopes, buffers, and landscape vegetation must be in accordance with the FAA's Advisory Circular 150/5200-33B, 'Hazardous Wildlife Attractants On or Near Airports' to discourage birds and other wildlife. Landscaping should be consistent with the list of recommended compatible native landscape plants for the airport available from the Lee County Port Authority (LCPA) Department of Planning and Environmental Compliance.*

Reflectivity and Power Interference – *Due to the proximity to the Airport, construction must comply with requirements of FAR Part 77, and related Federal Communications Commission (FCC), and Lee County LDC review requirements for all structures including frequency coordination of all broadcasting facilities so as not to interfere with aircraft and on-ground electronic navigation equipment.*

Light Emissions – *The applicant must minimize any potential light emissions that might distract, potentially blind, or create other impacts for aircraft landing, taking off, aircraft in flight, or impacts on the controllers in the (existing and future relocated) Air Traffic Control Tower. Parking lot lighting and other light sources therefore must be shielded downward so as not to created glare.*

Noise – *Proposed adult or child daycare facilities should be located south of the east/west Florida Power and Light corridor. Research facilities may also be impacted by noise. To the greatest extent possible, noise-sensitive land uses should comply with the following regulations:*

- *Federal Aviation Regulations Part 150, "Airport Noise Compatibility Planning"*
- *F.S. Chapter 333, "Airport Zoning"*
- *Lee County Land Development Code Section 34-100 et seq.*

Aircraft Overflights – *Existing and future flight patterns, proximity to the airport, ambient sound levels, and other information should be disclosed to all potential developers within the Florida Gulf Coast Technology and Research Park.*

Public Investment – *Any action near SWFIA which may have the potential to jeopardize the public investment and operation of Lee County public use airports should be reviewed by Lee County and potentially analyzed and reviewed by the Lee County Port Authority, the FAA and the FDOT depending on the nature and proximity of the potential impact.*

SOILS

The applicant has provide a description of the soils that are found on site. For a detailed description please see the application materials.

POPULATION ACCOMMODATION

The proposed amendment will not change the future land use category of the subject site and therefore will not have an effect on Lee County's population accommodation or Table 1(b) of the Lee Plan.

ENVIRONMENTAL CONSIDERATIONS

The applicant has submitted this privately initiated Lee Plan amendment in conjunction with a Development of Regional Impact (DRI) application #DRI2007-00002. The DRI encompasses approximately ± 727 acres of property located at the northeast quadrant of the intersection of Ben Hill Griffin Parkway and Alico Road. The property which is the subject of this Lee Plan amendment is approximately ± 103 acres and is located within the overall ± 727 acre parcel which is in the Tradeport and Wetlands Future Land Use Category.

The applicant has an approved Environmental Resource Permit (ERP) from South Florida Water Management District (SFWMD) for the Florida Gulf Coast Technology and Research Park project. The SFWMD, ERP application for Florida Gulf Coast Technology and Research Park depicts ± 1048 acres for the proposed project. In the Florida Gulf Coast Technology and Research Park Development of Regional Impact (DRI) application #DRI2007-00002 the acreage is ± 727 acres. In the ERP it was noted that the wetland boundaries were field delineated by Passarella and Associates Inc. and formerly verified by (SFWMD) in 2003. Wilson Miller Inc. conducted a vegetative community assessment on the ± 1048 acres and verified habitat quality and FLUCCS in January 2004.

A vegetative community assessment and protected species survey for Lee County listed species meeting the requirements of Lee County Land Development Code (LDC) Section 10-473 was conducted by Boylan Environmental Consultants, Inc. on the ± 103 acre site. The property was field verified by ES Staff on April 1, 2010. The assessment and a Florida Land Use, Cover and Classification System (FLUCCS) map was submitted by the applicant:

The vegetative communities located on the property are primarily composed of Pine Flatwoods, Hydric Pine Flatwoods, Cypress Wetlands, Cypress-Pine-Sabal Palm, and Exotic Wetland Hardwoods. Noted native vegetation onsite included South Florida Slash Pine (*Pinus elliotti var densa*), Sabal Palm (*Sabal palmetto*), Bald Cypress (*Taxodium distichum*), Laurel Oak (*Quercus laurifolia*), Pop Ash (*Fraxinus caroliniana*), Swamp Bay (*Persea palustris*) and Dahoon Holly (*Ilex cassine*). Various epiphyte were scattered throughout this area including the listed Wild pine (*Tillandsia balbisiana*), Golden Polypody (*Phlebodium aureum*), Shoestring Fern (*Vittaria lineata*) and Florida Butterfly Orchid (*Encyclia tampensis*). Exotic vegetation predominately melaleuca (*Melaleuca quinquenervia*) and Brazilian pepper (*Schinus terebinthifolius*) was found throughout the site in various densities. There are ± 52.41 acres of wetlands within the ± 103 acres included in this Comprehensive Plan Amendment.

ES Staff conducted a site inspection on April 1, 2010 for the ± 103 acre portion of the project and observed the following:

The site was heavily vegetated with scattered grassy areas. Exotic coverage varied throughout the site with the heaviest coverage located in the central portion of the site, lessening towards the western and eastern property lines. In the north-eastern portion of the property staff observed a cypress dominated wetland with melaleuca along the fringe but, with little to no exotics in the central portion of the area. Staff noted large bald cypress, pop ash and various airplant throughout this wetland community. The hydrological conditions were favorable with water levels at the time of the site inspection between two and three feet in depth. There is a flowway located onsite in the western portion of the property that had a significant volume of water flow at the time of the site inspection.

Indigenous:

The project is located within the Six Mile Cypress/Ten Mile Canal Watershed, the future land use is Tradeport and Wetlands and the project is adjacent to the Density Reduction Groundwater Recharge

(DRGR). There are special environmental and design review guidelines for the Tradeport land use category that with the impacts proposed and the intensity of the requested use staff is concerned will not be met. The entire ±103 acre project is covered in vegetation, exotics dominate in some areas; however, other areas are dominated by indigenous vegetation with limited to no exotic coverage. Indigenous areas include pine flatwoods, cypress-pine-sabal palm, hydric pine flatwoods, and cypress dominated wetlands. The wetland located in the north-eastern portion of the site had little in the way of exotics and was dominated by bald cypress (*Taxodium distichum*) with laurel oak (*Quercus laurifolia*), pop ash (*Fraxinus caroliniana*), swamp bay (*Persea palustris*) and dahoon holly (*Ilex cassine*). Various epiphyte were scattered throughout this area including the listed Wild pine (*Tillandsia balbisiana*), golden polypody (*Phlebodium aureum*), shoestring fern (*Vittaria lineata*) and Florida butterfly orchid (*Encyclia tampensis*).

There are approximately 52.41 acres of wetlands on the subject site. The applicant is proposing to impact a majority of the wetlands within the subject site and is not proposing any indigenous preservation. This is not consistent with the Lee Plan, or the Best Management Practices from the Henigar & Ray study that are required in the Tradeport land use category.

Protected Species:

A protected species survey for Lee County listed species, meeting the requirements of Lee County Land Development Code (LDC) Section 10-473, was conducted by Wilson Miller Inc. in January of 2004 on the ± 1048 acre parent parcel which included the ± 103 acres being requested with this application. An updated survey was conducted on the ± 103 acre site by Boylan Environmental Consultants, Inc. in December 2009 and again in January 2010. The survey was field verified by ES Staff on April 1, 2010. Listed species observed by Boylan Environmental Consultants, Inc on the ±103 acre site included the Little Blue Heron (*Egretta caerulea*) and the epiphyte Wild pine (*Tillandsia balbisiana*), no other listed species were observed. However, the survey conducted by Wilson Miller, that incorporated the larger parent parcel (1048 acres), observed additional listed species. The additional listed species observed on the overall project have the potential to occur on the ±103 acre site, therefore ES Staff has identified the species observed by Wilson Miller. These species include:

The American Alligator (*Alligator mississippiensis*) is listed as a Species of Special Concern (SSC) by the Florida Fish and Wildlife Conservation Commission (FWC) and as Threatened by The Fish and Wildlife Service (FWS) because of its similarity to the American crocodile. Two American alligator were observed by Boylan Environmental Inc in a borrow area, and there is the potential for the alligator to utilize the wetlands and borrow area onsite.

Big Cypress Fox Squirrel (*Sciurus niger avicennia*) is listed as Threatened by FWC and its distribution is believed to be limited to an area south of the Caloosahatchee river and west to the Everglades. A Big Cypress fox Squirrel was observed in the cypress wetlands in the southwestern portion of the parent parcel site. Several stick like structures were also observed that are associated with the Big Cypress Fox Squirrel.

Gopher Tortoise (*Gopherus polyphemus*) is listed as threatened by the FWC. Two gopher tortoise burrows were observed east of the project on the parent parcel.

Several Species of wading bird were observed utilizing the site throughout the parent parcel.

Listed Plant Species include:

Stiff Leafed Wild Pine (*Tillandsia fasciculata*), The Wild Pine (*Tillandsia balbisiana*), fuzzy-wuzzy (*Tillandsia pruinosa*), Giant Wild Pine (*Tillandsia utriculata*), Butterfly Orchid (*Encyclia tampensis*), and Giant Leather Fern (*Acrostichum aureum*). These species were observed scattered throughout the site.

The project is located within the Florida Panther (*Puma concolor*) Primary Zone and as such consultation with FWS has been initiated. According to the applicant, consultation with FWS has specified that compensation for impacts to habitat for the Florida panther will be accomplished through off site mitigation.

Environmental Features:

Objective 114.1 of the Lee Plan States:

Objective 114.1: The natural functions of wetlands and wetland systems will be protected and conserved through the enforcement of the county's wetland protection regulations and the goals, objectives, and policies in this plan. "Wetlands" include all of those lands, whether shown on the Future Land Use Map or not, that are identified as wetlands in accordance with F.S. 373.019(17) through the use of the unified state delineation methodology described in FAC Chapter 17-340, as ratified and amended by F.S. 373.4211.

A majority of the ± 52 acres of wetlands located onsite are proposed for impact by the project. Of major hydrological importance is a flowway that has offsite connectivity. The origin of the flowway lies outside the boundaries of the ±103 acre parcel, the flowway originates northeast of the subject property, on the parent parcel, with conveyance through the property along the western property line. The flowway also has hydrological connectivity to the southwest, traveling under Ben Hill Griffin Parkway, then offsite to the adjacent property where it is proposed for restoration. The applicant is proposing to impact a portion of the flowway which has the potential to increase velocity during major storm events causing downstream flooding. Policy 60.5.3 states: the County encourages the preservation of existing natural flow-ways and the restoration of historic natural flow-ways. Compaction of the flowway can also increase sediment and turbidity causing water quality concerns for downstream property-owners.

The cypress dominated wetland located in the north-eastern portion of the property is also proposed for impact. Preservation of this wetland would make an excellent addition to the project as an aesthetic feature and would aid in storm water management, aquifer recharge and flood control. The wetland could be incorporated into the project's storm water management system. The management system can then maintain the hydrology and function of the wetland and the wetland can assist in storm water management, flood control and water quality.

The project is located within the Six Mile Cypress/Ten Mile Canal Watershed and the project's Future Land Use is Tradeport and Wetlands. There are special environmental and design review guidelines for the Tradeport Land Use Category. Lee Plan Policy 1.2.2 includes language for environmental concerns: Because this area is located within the Six Mile Cypress Basin and is also a primary point of entry into Lee County, special environmental and design review guidelines will be applied to its development to maintain the appearance of this area as a primary point of entry into Lee County. Tradeport is adjacent to the DRGR and as such, Policy 1.2.2: includes language for the protection of ground water resources stating that: during the rezoning process, the best environmental management practices identified on pages 43 and 44 of the July 28, 1993 Henigar & Ray study entitled, "Groundwater Resource Protection Study" will be necessary to protect potential groundwater resources in the area.

The applicant is proposing wetland impacts to a majority of the ±100 acre portion of the DRI proposed in this text amendment. These wetland impacts are inconsistent with the following Goals, Objectives, and Policies of the Lee Plan:

Lee Plan Goal 60: Coordinated Surface Water Management and Land Use Planning on a Watershed Basis. To protect or improve the quality of receiving waters and surrounding natural areas and the functions of natural groundwater aquifer recharge areas while also providing flood protection for existing and future development.

Preservation or the incorporation of wetlands into the storm water management system will assist with ground water recharge.

Lee Plan Objective 60.4: Critical Areas. The Six Mile Cypress Basin (as defined in Chapter 10 of the Land Development Code) and the Density Reduction/Groundwater Resource land use category are both identified as “critical areas for surface water management.” The county will maintain existing regulations to protect the unique environmental and water resource values of these areas.

Lee Plan Objective 60.5: Incorporation of Green Infrastructure Into the Surface Water Management System. The long-term benefits of incorporating green infrastructure as part of the surface water management system include improved water quality, improved air quality, improved water recharge/infiltration, water storage, wildlife habitat, recreational opportunities, and visual relief within the urban environment.

Lee Plan Policy 60.5.2: The County encourages new developments to design their surface water management system to incorporate existing wetland systems.

Incorporating wetlands into Storm Water Management Systems benefits water quality, water recharge/infiltration, water storage and the hydrology of the wetland. The applicant is proposing impacts to the cypress wetland located in the north-central portion of the project.

Lee Plan Policy 60.5.3: The County encourages the preservation of existing natural flow-ways and the restoration of historic natural flow-ways.

The project will impact a significant portion of the flowway located in the western section of the property. The Lee Plan encourages the preservation and restoration of natural flowways. The impacts proposed to the flowway is inconsistent with the Lee Plan Goal 60 and Policy 60.5.3

Lee Plan Goal 61: Protection of Water Resources. To protect the county's water resources through the application of innovative and sound methods of surface water management and by ensuring that the public and private construction, operation, and maintenance of surface water management systems are consistent with the need to protect receiving waters.

Lee Plan Objective 61.2: Mimicking the Functions of Natural System. Support a surface water management strategy that relies on natural features (flow ways, sloughs, strands, etc.) and natural systems to receive and otherwise manage storm and surface water.

Policy 61.2.1: requires projects to use wetlands for storm water management. The project proposes impacts to a majority of the wetlands. This is inconsistent with the Lee Plan. Incorporating wetlands into the storm water management system preserves indigenous vegetation, promotes preservation of wildlife habitat and can be used as an aesthetic feature to promote utilization of natural features and green infrastructure for storm water management.

Conclusion:

The applicant is requesting retail at a higher intensity, for the ±103 acre portion of the DRI, than what is allowed in the Tradeport land use category. A majority of the wetlands are proposed for impact and limited indigenous vegetation is to be offered for preservation. The property is located within the Six Mile Cypress Watershed and is a primary point of entry into Lee County. Per Policy 1.2.2: Because this area is located within the Six Mile Cypress Basin and is also a primary point of entry into Lee County, special environmental and design review guidelines will be applied to its development to maintain the appearance of this area as a primary point of entry into Lee County.

The applicant is proposing to impact a portion of the flowway which has the potential to increase velocity during major storm events causing downstream flooding. Compaction of the flowway can also increase sediment and turbidity causing water quality concerns for downstream property owners. Impacting the flowway is inconsistent with Policy 60.5.3 which seeks to encourage the preservation of existing natural flow-ways and the restoration of historic natural flow-ways.

The cypress dominated wetland is proposed for impact. Preservation of this wetland and incorporating it into the storm water management system would make an excellent addition to the project as an aesthetic feature and would aid in storm water management, aquifer recharge and flood control. Impacting this wetland is inconsistent with Lee Plan Policy 60.5.2 which encourages new developments to design their surface water management system to incorporate existing wetland systems. The cypress dome is currently in the Wetlands Future Land use category. The land use category should be revised and the cypress dome placed into Conservation Lands, land use category.

The applicant should include the flowways and uplands into the conservation lands to compliment the Tradeport Land Use Category. The project should be designed to incorporate the wetlands into the stormwater management system for green infrastructure. Preservation of flowways and wetlands may assist with groundwater recharge and water quality. The amount of impacts to the wetlands and modification to the flowways on the project are inconsistent with the best management practices specified in the 1993 Heniger and Ray study, which is presumed to be necessary to protect the ground water resources in this area. The project as proposed is inconsistent with Tradeport land use and does not support the preservation of environmental features.

HISTORIC RESOURCES

The Florida Division of Historical Resources has found that “no cultural resources eligible for listing in the NRHP were identified within the project area.”

Portions of this site are within the level 2 sensitivity areas for archeological and historic resources. Prior to development a Certificate to Dig will be required.

SCHOOL IMPACTS

The Lee County School District provided correspondence dated February 2, 2010 and provided the following response: "After reviewing the submittal, this amendment should have no impact on classroom needs based on the applicant's indication that this will be commercial/industrial."

EMERGENCY MEDICAL SERVICES (EMS)

Lee County EMS provided correspondence dated February 1, 2010 concerning the proposed Lee Plan amendment stating that they "will be able to provide service with our current operational deployment structure."

SOLID WASTE

The Lee County Solid Waste Division provided the applicant a letter dated April 29, 2010 stating that "the Lee County Solid Waste Division is capable of providing solid waste collection service for the proposed 700,000 square foot of commercial space in the 107 acre site."

MASS TRANSIT

The applicant did not provide an analysis of compliance with the Lee Plan regarding transit, or an analysis of future impacts to transit service.

POLICE

The Lee County Sheriff's Office provided a letter to the applicant on January 28, 2010 stating that the proposed Lee Plan amendment "would not affect the ability of the Lee County Sheriff's Office to provide core services as this time."

FIRE

The San Carlos Park Fire Protection and Rescue Service District provided a letter to the applicant dated January 4, 2010, and provided the following statement:

The project location is less than 3 miles from the main fire station at 19591 Ben Hill Griffin Parkway. The response time would be about 4 minutes or less. At this time, we use Lee County EMS for Advanced Life Support (ALS) transport and have our own Firefighter Paramedics on shift to provide non-transport ALS service. There will be no adverse impact to the fire district to provide fire protection and inspection services."

UTILITIES

The off-site utility improvements required for the Florida Gulf Coast Technology Center site are very significant due to the fact Alico Road will have to be four laned from Ben Hill Griffin Parkway east to Airport Haul Road. LCU has one 16" diameter and one 24" diameter water main within the right-of-way of Alico Road that will have to be replaced with one 36" diameter main as a part of the road widening project.

Significant off-site improvements will be required to provide adequate sanitary sewer service to this site including the construction of two recognized LCU CIP projects that have been placed on hold for at least the current and next fiscal years. The CIPs consist of the extension of a parallel 16" diameter sewage force main along the Ben Hill Griffin Parkway corridor starting at Alico Road, then south approximately 8,500', then from the Ben Hill Griffin right-of-way west approximately 1,500' west under I-75 to our Three Oaks WWTP. These improvements will accommodate the flows generated from the project at build out.

LCU has no reclaimed water available for this project.

Lee County Utilities Department provided the applicant a letter dated January 14, 2010 stating that “Potable water lines and wastewater lines are in operation in the vicinity of the proposed project mentioned above. However, in order to provide service to the subject parcels, developer funded system enhancements such as line extensions may be required.”

B. CONCLUSIONS

There are three main issues with the proposed Lee Plan Amendment. These issues include: 1) Tradeport Uses, 2) Wetlands Impacts, and 3) Transportation Impacts

Tradeport Uses:

There is an adequate level of community and regional retail commercial uses either built or approved in the areas surrounding the subject property. Planning staff does not believe that the Lee Plan revisions proposed by the applicant to allow community and regional retail commercial development within the Tradeport future land use category are appropriate. However, performing the staff analysis for this proposed amendment and meeting with the applicant has revealed that the existing language of Policy 1.2.2 does not provide sufficient guidance concerning stand alone retail commercial uses. The existing language solely deals with “ancillary retail and Corner Store commercial uses, intended to support the surrounding business and industrial land uses,” which provides unnecessary challenges to potential developers within the Tradeport future land use category. Although staff does not agree with the specific amendments recommended by the applicant, staff does see a need to amend the Lee Plan to better define the commercial uses that are permitted within the Tradeport future land use category.

Staff agrees that the hotel use is an appropriate use for a research park and notes that it is a permitted use in the Tradeport category. Additionally, staff is not concerned with the proposed amendment to Policy 2.12.2 of the Lee Plan to clarify that public and quasi-public, community facilities and recreational uses shall also be permitted where appropriate and reviewed as part of a planned development.

Wetland Impacts:

The applicant is proposing to impact a portion of the existing flowway. The amount of impacts to the wetlands and modification to the flowways on the project are inconsistent with the best management practices included in the 1993 Heniger and Ray study, which is presumed to be necessary to protect the ground water resources in this area. The project as proposed is inconsistent with Lee Plan because it does not support the preservation of environmental features.

Transportation Impacts:

The creation of a destination retail shopping center east of Ben Hill Griffin Road on the north side of Alico Road will cause additional left hand turning movements in conflict with the existing and anticipated industrial traffic creating a safety issue. There are also a significant number of roadways in the area that are projected to fail by 2030, both with and without the land use modification, and there is no specific mitigation plan to address those failures.

C. STAFF RECOMMENDATION

Staff recommends that the Board of County Commissioners *not transmit* the applicant’s proposed Lee Plan amendment. Recognizing the shortcomings of Policy 1.2.2, staff recommends that the Board of County Commissioners **transmit** the following staff amendment to provide clarity for these retail uses:

POLICY 1.2.2: The Tradeport areas are commercial and industrial lands adjacent to the airport needed to accommodate projected growth through the year 2030. These areas will include

developments consisting of light manufacturing or assembly, warehousing, and distribution facilities; research and development activities; laboratories; ground transportation and airport-related terminals or transfer facilities; hotels/motels, meeting facilities; and office uses. Stand alone retail commercial uses intended to support and compliment the surrounding business and industrial land uses are permitted if they are approved as part of a Development of Regional Impact (DRI) or Planned Development rezoning. Stand alone retail commercial uses are limited to 1 acre out of every 10 Tradeport and preserved wetland acres. Ancillary retail and Corner Store commercial uses, related directly to the sale of products manufactured or services provided in the Tradeport intended to support the surrounding business and industrial land uses, are allowed if they are part of a Planned Development. Future development in this category is encouraged to include a mixture of land uses as described in Policy 2.12.2. Residential uses, other than bona fide caretaker residences, are not permitted in this category except to the extent provided in Chapter XIII of the Plan. Caretaker residences are not permitted in the Airport Noise Zone B. Because this area is located within the Six Mile Cypress Basin and is also a primary point of entry into Lee County, special environmental and design review guidelines will be applied to its development to maintain the appearance of this area as a primary point of entry into Lee County. Property in Section 1 and the east ½ of Section 2, Township 46 South, Range 25 East, and in Section 6, Township 46 South, Range 26 East, must be rezoned to a planned development zoning category prior to any development other than the construction of essential public services. During the rezoning process, the best environmental management practices identified on pages 43 and 44 of the July 28, 1993 Henigar & Ray study entitled, “Groundwater Resource Protection Study” will be rebuttably presumed to be necessary to protect potential groundwater resources in the area.

The amendment to Policy 1.2.2 of the Lee Plan, as proposed by staff, would better define the allowable retail commercial uses that are permitted in conjunction with the development of light manufacturing or assembly, warehousing, and distribution facilities; research and development activities; laboratories; ground transportation and airport-related terminals or transfer facilities; hotels/motels, meeting facilities; and office uses that are intended as the primary use of the Tradeport future land use category. Limiting the acres that are used in the calculation for the stand alone retail commercial uses to Tradeport and preserved wetland acres would assure that unintended incentives are not being provided to fill wetlands to achieve a greater amount of Tradeport lands. This will help preserve the anticipated amount of primary Tradeport uses while providing the applicant with the ability to achieve his business model which provides standalone retail uses as a catalyst and marketing tool for the industrial park.

The Tradeport future land used category use to allow approximately 10 percent of a development’s floor area to be developed as ancillary retail commercial uses on projects greater than 10 acres. This was found to be too restrictive by the *Commercial/Industrial Land Use Analysis*, completed by Basile Baumann Prost & Associates for Lee County, primarily because of the restriction placed on projects that were smaller than 10 acres. At the time Lee County elected to simply remove the limitations placed on ancillary retail commercial uses and added Corner Store uses. Unfortunately, in addition to removing the restrictions placed on the ancillary and corner store uses the amendment also removed any guidance provided by the Lee Plan as to what was meant by “Ancillary retail and Corner Store commercial uses, intended to support the surrounding business and industrial land uses” in the Tradeport future land use category. The amendment proposed by staff would provide that guidance.

PART III - LOCAL PLANNING AGENCY REVIEW AND RECOMMENDATION

DATE OF PUBLIC HEARING: June 18, 2010

A. LOCAL PLANNING AGENCY REVIEW

Staff provided a brief overview of the proposed amendment. Staff noted that the amendment is being proposed in conjunction with a Development of Regional Impact application. Staff discussed the history of the Tradeport category and that these lands had been set aside for economic development with the purpose to diversify Lee County's economy. Staff also discussed previous changes to the category that has resulted in the current private amendment. Staff informed the LPA that the Benderson Group are actual developers and long term owners of commercial, industrial, business and research and development parks.

The applicant provided an overview of their corporation, existing projects, and the location of the subject site. The applicant also discussed their business model and how it is an ideal fit with the Tradeport category. The applicant stated that they were seeking certainty through the amendment due to the current ambiguity of the Tradeport policy. The applicant stated that they were in support of the staff recommendation. Two members of the public recommended to the LPA that they transmit the proposed amendment. A representative of the Florida Gulf Coast University also recommended transmittal.

B. LOCAL PLANNING AGENCY RECOMMENDATION AND FINDINGS OF FACT SUMMARY

- 1. RECOMMENDATION:** The Local Planning Agency recommends that the Board transmit the proposed amendment.
- 2. BASIS AND RECOMMENDED FINDINGS OF FACT:** The Local Planning Agency accepted the findings of fact as advanced by staff.

C. VOTE:

NOEL ANDRESS	NAY
CINDY BUTLER	ABSTAIN
CARIE CALL	AYE
WAYNE DALTRY	AYE
JIM GREEN	AYE
MITCH HUTCHCRAFT	AYE
RONALD INGE	AYE

**PART IV - BOARD OF COUNTY COMMISSIONERS
HEARING FOR TRANSMITTAL OF PROPOSED AMENDMENT**

DATE OF TRANSMITTAL HEARING: June 23, 2010

A. BOARD REVIEW:

Staff gave a brief presentation to the Board of County Commissioners discussing the proposed Future Land Use Map amendment. The Board of County Commissioners asked some general questions about the affect of the proposed text change. This was followed by a presentation from the applicant about their specific proposed development. The applicant stated that the changes proposed to the Lee Plan would be able to accommodate their development and business model.

One member of the Board of County Commissioners stated a few concerns about the project concerning Alico Road and specific site design issues. Staff responded by stating that this plan amendment was a DRI related amendment, and that those project specific concerns would be addressed through the DRI approval process, which the BoCC would approve concurrent with the actual adoption of the proposed Lee Plan amendment. This member of the BoCC then used the opportunity to direct staff concerning what would be looked at when the BoCC approved the DRI. These issues would include wetland and upland presrves, access to Alico Road, and on-site accommodation of stormwater detention/retention needs that result from the improvements to Alico Road.

A motion was made to transmit the staff proposed amendment to Policy 1.2.2 of the Lee Plan. The motion passed unanimously.

B. BOARD ACTION AND FINDINGS OF FACT SUMMARY:

- 1. BOARD ACTION:** The Board of County Commissioners transmitted the proposed amendment.
- 2. BASIS AND RECOMMENDED FINDINGS OF FACT:** The Board of County Commissioners accepted the findings of fact as advanced by staff and the LPA.

C. VOTE:

A. BRIAN BIGELOW	AYE
TAMMARA HALL	AYE
VACANT	
RAY JUDAH	AYE
FRANKLIN B. MANN	AYE

**PART V - DEPARTMENT OF COMMUNITY AFFAIRS OBJECTIONS,
RECOMMENDATIONS, AND COMMENTS (ORC) REPORT**

DATE OF ORC REPORT: _____

A. DCA OBJECTIONS, RECOMMENDATIONS AND COMMENTS

B. STAFF RESPONSE

C. RECOMMENDATION

PART VI - BOARD OF COUNTY COMMISSIONERS
HEARING FOR ADOPTION OF PROPOSED AMENDMENT

DATE OF ADOPTION HEARING: _____

A. BOARD REVIEW:

B. BOARD ACTION AND FINDINGS OF FACT SUMMARY:

1. BOARD ACTION:

2. BASIS AND RECOMMENDED FINDINGS OF FACT:

C. VOTE:

BRIAN BIGELOW

TAMMARA HALL

VACANT

RAY JUDAH

FRANKLIN B. MANN

**STAFF REPORT
FROM
DEPARTMENT OF COMMUNITY DEVELOPMENT
DIVISION OF ENVIRONMENTAL SCIENCES**

Date: May 28, 2010
To: Brandon Dunn, Planner

From: Doug Griffith, Environmental Planner
Phone: (239)533-8323
e-mail: dgriffith@leegov.com

Project: Florida Gulf Coast Technology and Research Park
Case: CPA2010-00001

PROJECT:

The applicant has submitted this privately initiated Lee Plan amendment in conjunction with a Development of Regional Impact (DRI) application #DRI2007-00002. The DRI encompasses approximately ± 727 acres of property located at the northeast quadrant of the intersection of Ben Hill Griffin Parkway and Alico Road. The property which is the subject of this Lee Plan amendment is approximately ± 103 acres and is located within the overall ± 727 acre parcel which is in the Tradeport and Wetlands Future Land Use Category. The Amendment proposes to modify the Tradeport Policy 1.2.2 by establishing criteria under which community and regional retail commercial development may occur in conjunction with industrial, office and research and development if developed as a single project. Under the existing Future Land Use, Ancillary retail and Corner Store commercial uses, intended to support the surrounding business and industrial land uses, are allowed if they are part of a Planned Development. The applicant is requesting more intense retail than is permitted in the Tradeport Land Use Category.

PROJECT SITE:

The overall project is located on the north east corner of Ben Hill Griffin Parkway and Alico Road. Surrounding properties include: The Southwest Florida International Airport to the north, an approved undeveloped Industrial Planned Development (IPD) known as Premier Airport Park to the east and northeast, Airport Technology Mixed Use Planned Development (MPD) to the west and northwest, Ben Hill Griffin Parkway and an approved undeveloped MPD known as Jetway Tradeport to the west and Alico Road and Miromar Lakes to the south.

ENVIRONMENTAL ASSESSMENT:

The applicant has an approved Environmental Resource Permit (ERP) from South Florida Water Management District (SFWMD) for the Florida Gulf Coast Technology and Research Park project. The SFWMD, ERP application for Florida Gulf Coast Technology and Research Park depicts ± 1048 acres for the proposed project. In the Florida Gulf Coast Technology and Research Park Development of Regional Impact (DRI) application #DRI2007-00002 the acreage is ± 727 acres. In the ERP it was noted that the wetland boundaries were field delineated by Passarella and Associates Inc. and formerly verified by (SFWMD) in 2003. Wilson Miller Inc. conducted a

vegetative community assessment on the ±1048 acres and verified habitat quality and FLUCCS in January 2004.

A vegetative community assessment and protected species survey for Lee County listed species meeting the requirements of Lee County Land Development Code (LDC) Section 10-473 was conducted by Boylan Environmental Consultants, Inc. on the ±103 acre site. The property was field verified by ES Staff on April 1, 2010. The assessment and a Florida Land Use, Cover and Classification System (FLUCCS) map was submitted by the applicant:

The vegetative communities located on the property are primarily composed of Pine Flatwoods (FLUCCS 411), Hydric Pine Flatwoods (FLUCCS 625), Cypress Wetlands (FLUCCS 621), Cypress-Pine-Sabal Palm (FLUCCS 624) and Exotic Wetland Hardwoods (FLUCCS 619). Noted native vegetation onsite included South Florida Slash Pine (*Pinus elliotti var densa*), Sabal Palm (*Sabal palmetto*), Bald Cypress (*Taxodium distichum*), Laurel Oak (*Quercus laurifolia*), Pop Ash (*Fraxinus caroliniana*), Swamp Bay (*Persea palustris*) and Dahoon Holly (*Ilex cassine*). Various epiphyte were scattered throughout this area including the listed Wild pine (*Tillandsia balbisiana*), Golden Polypody (*Phlebodium aureum*), Shoestring Fern (*Vittaria lineata*) and Florida Butterfly Orchid (*Encyclia tampensis*). Exotic vegetation predominately melaleuca (*Melaleuca quinquenervia*) and Brazilian pepper (*Schinus terebinthifolius*) was found throughout the site in various densities. There are ±52.41 acres of wetlands within the ±103 acres included in this Comprehensive Plan Amendment.

ES Staff conducted a site inspection on April 1, 2010 for the ±103 acre portion of the project and observed the following:

The site was heavily vegetated with scattered grassy areas. Exotic coverage varied throughout the site with the heaviest coverage located in the central portion of the site, lessening towards the western and eastern property lines. In the north-eastern portion of the property staff observed a cypress dominated wetland with melaleuca along the fringe but, with little to no exotics in the central portion of the area. Staff noted large bald cypress, pop ash and various airplant throughout this wetland community. The hydrological conditions were favorable with water levels at the time of the site inspection between two and three feet in depth. There is a flowway located onsite in the western portion of the property that had a significant volume of water flow at the time of the site inspection.

INDIGENOUS:

The project is located within the Six Mile Cypress/Ten Mile Canal Watershed, the future land use is Tradeport and Wetlands and the project is adjacent to the Density Reduction Groundwater Recharge (DRGR). There are special environmental and design review guidelines for the Tradeport land use category that with the impacts proposed and the intensity of the requested use staff is concerned will not be met. The entire ±103 acre project is covered in vegetation, exotics dominate in some areas; however, other areas are dominated by indigenous vegetation with limited to no exotic coverage. Indigenous areas include pine flatwoods, cypress-pine-sabal palm, hydric pine flatwoods, and cypress dominated wetlands. The wetland located in the north-eastern portion of the site had little in the way of exotics and was dominated by bald cypress (*Taxodium distichum*) with laurel oak (*Quercus laurifolia*), pop ash (*Fraxinus caroliniana*), swamp bay (*Persea palustris*) and dahoon holly (*Ilex cassine*). Various epiphyte were scattered throughout this area including the

listed Wild pine (*Tillandsia balbisiana*), golden polypody (*Phlebodium aureum*), shoestring fern (*Vittaria lineata*) and Florida butterfly orchid (*Encyclia tampensis*).

A majority of the wetlands are to be impacted with no indigenous preservation consistent with the Tradeport land use category being proposed by the applicant.

PROTECTED SPECIES:

A protected species survey for Lee County listed species, meeting the requirements of Lee County Land Development Code (LDC) Section 10-473, was conducted by Wilson Miller Inc. in January of 2004 on the ± 1048 acre parent parcel which included the ± 103 acres being requested with this application. An updated survey was conducted on the ± 103 acre site by Boylan Environmental Consultants, Inc. in December 2009 and again in January 2010. The survey was field verified by ES Staff on April 1, 2010. Listed species observed by Boylan Environmental Consultants, Inc on the ±103 acre site included the Little Blue Heron (*Egretta caerulea*) and the epiphyte Wild pine (*Tillandsia balbisiana*), no other listed species were observed. However, the survey conducted by Wilson Miller, that incorporated the larger parent parcel (1048 acres), observed additional listed species. The additional listed species observed on the overall project have the potential to occur on the ±103 acre site, therefore ES Staff has identified the species observed by Wilson Miller. These species include:

The American Alligator (*Alligator mississippiensis*) is listed as a Species of Special Concern (SSC) by the Florida Fish and Wildlife Conservation Commission (FWC) and as Threatened by The Fish and Wildlife Service (FWS) because of its similarity to the American crocodile. Two American alligator were observed by Boylan Environmental Inc in a borrow area, and there is the potential for the alligator to utilize the wetlands and borrow area onsite.

Big Cypress Fox Squirrel (*Sciurus niger avicennia*) is listed as Threatened by FWC and its distribution is believed to be limited to an area south of the Caloosahatchee river and west to the Everglades. A Big Cypress fox Squirrel was observed in the cypress wetlands in the southwestern portion of the parent parcel site. Several stick like structures were also observed that are associated with the Big Cypress Fox Squirrel.

Gopher Tortoise (*Gopherus polyphemus*) is listed as threatened by the FWC. Two gopher tortoise burrows were observed east of the project on the parent parcel.

Several Species of wading bird were observed utilizing the site throughout the parent parcel.

Listed Plant Species include:

Stiff Leafed Wild Pine (*Tillandsia fasciculata*), The Wild Pine (*Tillandsia balbisiana*), fuzzy-wuzzy (*Tillandsia pruinosa*), Giant Wild Pine (*Tillandsia utriculata*), Butterfly Orchid (*Encyclia tampensis*), and Giant Leather Fern (*Acrostichum aureum*). These species were observed scattered throughout the site.

The project is located within the Florida Panther (*Puma concolor*) Primary Zone and as such consultation with FWS has been initiated. According to the applicant, consultation with FWS has

specified that compensation for impacts to habitat for the Florida panther will be accomplished through off site mitigation.

ENVIRONMENTAL FEATURES:

Objective 114.1 States:

The natural functions of wetlands and wetland systems will be protected and conserved through the enforcement of the county's wetland protection regulations and the goals, objectives, and policies in this plan. "Wetlands" include all of those lands, whether shown on the Future Land Use Map or not, that are identified as wetlands in accordance with F.S. 373.019(17) through the use of the unified state delineation methodology described in FAC Chapter 17-340, as ratified and amended by F.S. 373.4211.

A majority of the ± 52 acres of wetlands located onsite are proposed for impact by the project. Of major hydrological importance is a flowway that has offsite connectivity. The origins of the flowway lies outside the boundaries of the ± 103 acre parcel, the flowway originates northeast of the subject property, on the parent parcel, with conveyance through the property along the western property line. The flowway also has hydrological connectivity to the southwest, traveling under Ben Hill Griffin Parkway, then offsite to the adjacent property where it is proposed for restoration. The applicant is proposing to impact a portion of the flowway which has the potential to increase velocity during major storm events causing downstream flooding. Policy 60.5.3 states: the County encourages the preservation of existing natural flow-ways and the restoration of historic natural flow-ways. Compaction of the flowway can also increase sediment and turbidity causing water quality concerns for downstream property-owners.

The cypress dominated wetland located in the north-eastern portion of the property is also proposed for impact. Preservation of this wetland would make an excellent addition to the project as an aesthetic feature and would aid in storm water management, aquifer recharge and flood control. The wetland could be incorporated into the projects storm water management system, the management system can then maintain the hydrology and function of the wetland and the wetland can assist in storm water management, flood control and water quality.

The project is located within the Six Mile Cypress/Ten Mile Canal Watershed and the project's Future Land Use is Tradeport and Wetlands. There are special environmental and design review guidelines for the Tradeport Land Use Category. Lee Plan Policy 1.2.2 includes language for environmental concerns: Because this area is located within the Six Mile Cypress Basin and is also a primary point of entry into Lee County, special environmental and design review guidelines will be applied to its development to maintain the appearance of this area as a primary point of entry into Lee County. Tradeport is adjacent to the DRGR and as such, Policy 1.2.2: includes language for the protection of ground water resources stating that: during the rezoning process, the best environmental management practices identified on pages 43 and 44 of the July 28, 1993 Henigar & Ray study entitled, "Groundwater Resource Protection Study" will be necessary to protect potential groundwater resources in the area.

The applicant is proposing wetland impacts to a majority of the ± 100 acres portion of the DRI proposed in this text amendment. These wetland impacts are inconsistent with the following Goals,

Objectives, and Policies of the Lee Plan:

Lee Plan Goal 60: Coordinated Surface Water Management and Land Use Planning on a Watershed Basis. To protect or improve the quality of receiving waters and surrounding natural areas and the functions of natural groundwater aquifer recharge areas while also providing flood protection for existing and future development.

Preservation or the incorporation of wetlands into the storm water management system will assist with ground water recharge.

Lee Plan Objective 60.4: Critical Areas. The Six Mile Cypress Basin (as defined in Chapter 10 of the Land Development Code) and the Density Reduction/Groundwater Resource land use category are both identified as “critical areas for surface water management.” The county will maintain existing regulations to protect the unique environmental and water resource values of these areas.

Lee Plan Objective 60.5: Incorporation of Green Infrastructure Into the Surface Water Management System. The long-term benefits of incorporating green infrastructure as part of the surface water management system include improved water quality, improved air quality, improved water recharge/infiltration, water storage, wildlife habitat, recreational opportunities, and visual relief within the urban environment.

Lee Plan Policy 60.5.2: The County encourages new developments to design their surface water management system to incorporate existing wetland systems.

Incorporating wetlands into Storm Water Management Systems benefits water quality, water recharge/infiltration, water storage and the hydrology of the wetland. The applicant is proposing impacts to the cypress wetland located in the north-central portion of the project.

Lee Plan Policy 60.5.3: The County encourages the preservation of existing natural flow-ways and the restoration of historic natural flow-ways.

Lee Plan Goal 61: Protection of Water Resources. To protect the county's water resources through the application of innovative and sound methods of surface water management and by ensuring that the public and private construction, operation, and maintenance of surface water management systems are consistent with the need to protect receiving waters.

Lee Plan Objective 61.2: Mimicking the Functions of Natural System. Support a surface water management strategy that relies on natural features (flow ways, sloughs, strands, etc.) and natural systems to receive and otherwise manage storm and surface water.

Lee Plan Policy 61.2.1: All development proposals outside the future urban areas must recognize areas where soils, vegetation, hydrogeology, topography, and other factors indicate that water flows or ponds; and require that these areas be utilized to the maximum extent possible, without significant structural alteration, for on-site stormwater management; and require that these areas be integrated

into area-wide coordinated stormwater management schemes.

Policy 61.2.1: requires projects to use wetlands for storm water management. The project proposes impacts to a majority of the wetlands. This is inconsistent with the Lee Plan. Incorporating wetlands into the storm water management system preserves indigenous vegetation, promotes preservation of wildlife habitat and can be used as an aesthetic feature to promote utilization of natural features and green infrastructure for storm water management.

CONCLUSION:

The applicant is requesting retail at a higher intensity, for the ±103 acre portion of the DRI, than what is allowed in the Tradeport land use category. A majority of the wetlands are proposed for impact and limited indigenous vegetation is to be offered for preservation. The property is located within the Six Mile Cypress Watershed and is a primary point of entry into Lee County. Per Policy 1.2.2 special environmental and design review guidelines are required. Revising this policy language to allow more retail will require more pavement and less green space. This is inconsistent with Tradeport land use and does not support the preservation of environmental features.

Memo

To: Paul O'Connor, Planning Director

From: David Loveland, Public Works Operations Manager, Planning *DL*

Date: June 11, 2010

Subject: CPA 2010-01 (Florida Gulf Coast Technology & Research Park)

The Department of Transportation has reviewed the above-referenced privately-initiated comprehensive plan amendment, submitted in conjunction with a DRI application, to modify the "Tradeport" land use designation for approximately 103 acres on the north side of Alico Road east of Ben Hill Griffin Parkway to allow significantly more commercial development than otherwise would be allowed. The applicant has asked that this change allow an additional 700,000 square feet of regional and community commercial/retail space by 2030 for purposes of the traffic analysis (half of that for the 2014 analysis). A significant number of roadways in the area are projected to fail by 2030, both with and without the land use modification, and there is no specific mitigation plan to address those failures or larger public benefit being provided by the applicant to off-set the failures and justify this modification of critical "Tradeport" lands in the heart of the "Research Diamond." Therefore, DOT staff recommends the amendment not be transmitted.

Analysis of Impacts

In order to analyze the impact of this proposal on the Lee County MPO's 2030 Financially Feasible Plan, the applicant's consultant added the employment associated with 700,000 square feet of commercial (1,750 employees) to the zonal data for existing traffic analysis zone (TAZ) 1387, and ran the FSUTMS travel demand model. Based on the model runs on the financially feasible plan network, six roadway segments within a 3-mile radius of the site are projected to exceed their adopted level of service standard in 2030 with or without this amendment. They are:

Alico Road from Three Oaks Parkway to I-75
Ben Hill Griffin Parkway from Alico Road to FGCTRP Entrance
Ben Hill Griffin Parkway from FGCTRP Entrance to Terminal Access Road
Treeline Avenue from Terminal Access Road to Daniels Parkway
I-75 from Corkscrew Road to Alico Road
I-75 from Alico Road to Daniels Parkway

Applicant's Proposed Mitigation

The applicant's consultant estimates that the project will generate \$7.7 million in road impact fees under today's rate schedule, and suggests that these payments can be used to fund whatever

improvements are found to be necessary to support general growth in the area. The DRI proportionate share amount has not yet been determined, as the DRI analysis is not yet sufficient and the DRI impacts not yet agreed upon. The consultant suggests that since this development is not currently anticipated in future growth forecasts that all impact fees generated would be new revenues beyond the 2030 revenue forecasts. That approach ignores the fact that future road impact fee revenue forecasts are not site-specific, and does not really address the issue of the needed improvements being financially feasible and reasonably expected to be in place not only when the impacts of the development arrive, but in the horizon year of the plan. It also does not account for the potential reduction or repeal of road impact fees in the future, options that have been discussed in the current economic downturn.

Needed Infrastructure Commitments

Section B.1.e of the County's comprehensive plan amendment application states that "An inability to accommodate the necessary modifications within the financially feasible limits of the plan will be a basis for denial of the requested land use change." Normally, the County would look for a specific financial commitment from an applicant to make the necessary improvements by the 2030 time frame, otherwise DOT staff would recommend denial under these circumstances. Without a financial commitment, we cannot say that there is sufficient infrastructure planned to accommodate future growth, including the amended land use. There have been some limited instances where the County has allowed such amendments to move forward based on their specific circumstances; examples include there being no real roadway solution and the applicant making a commitment to fund alternative modes of transportation, or there being a site-specific condition put in the comprehensive plan that limits the amount of development until the needed improvements are incorporated into the financially feasible plan.

Also the MPO's long range plan is currently being updated and extended to the year 2035, so the list of improvements that are or will be in the financially feasible plan is somewhat in flux. However, in this case, we are looking at a proposed land use modification in an area where there are expected to be significant roadway improvement needs, and the applicant has offered the payment of impact fees and no other solution.

Based on the MPO's 2030 Plan, as adopted in December, 2005 and last amended in March, 2006, the needed improvements and their costs are:

<u>Segment</u>	<u>Current</u>	<u>Needed</u>	<u>Cost</u>
Alico Rd., Three Oaks-I-75	6L	Alico Expwy.	\$603,111,223
Ben Hill Griffin Pkwy, Alico Rd.-Terminal	4L	I-75 10L	See below
Treeline Ave, Terminal-Daniels	4L	I-75 10L	See below
I-75, Corkscrew.-Alico	6L	12L	\$77,514,291*
I-75, Alico-Daniels	6L	10L	\$78,302,569*
TOTAL			\$758,928,083

**Pro-rated cost of larger project based on segment length*

The MPO plan does not identify improvements to Ben Hill Griffin Parkway/Treeline Avenue between Alico Road and Daniels Parkway, because the widening of this road is not anticipated to

be needed once I-75 is widened to ten lanes. One complicating factor in regards to the future widening of I-75 is that the Florida Legislature established the Southwest Florida Expressway Authority in 2003 and gave it the specific objective of expanding the interstate through the addition of tolled express lanes in portions of Lee and Collier Counties. Both the Expressway Authority and the Florida Turnpike Enterprise conducted preliminary toll feasibility studies and determined that a 10-lane interstate project could be supported by toll revenues and financially feasible, but only if there were 6 tolled express lanes and 4 non-tolled general use lanes. At the same time, FDOT secured Federal funding to move forward with 6-laning I-75 from Golden Gate Parkway in Collier County to Colonial Boulevard in Lee County. This project was recently completed. The added lanes were not tolled, and it may be difficult in the future (legally and politically) to toll lanes that are not specialty lanes (for example, HOV lanes) or were not tolled in the past. That means the implementation of a 10-lane project made up of 6 tolled express lanes and 4 non-tolled general use lanes may not be feasible in the future, and other configurations may not be feasible as toll-supported projects. With the recent completion of the 6-laning and the reduction in demand on the interstate due to the current economic downturn, the need for additional lanes has been pushed farther into the future. The Expressway Authority has recently decided to pursue its dissolution.

Alico Road

The FSUTMS computerized travel demand model used to analyze the impact of this comprehensive plan change is a system-wide model that sometimes does not realistically reflect what might happen at a given site. This plan amendment only affects a portion of the Florida Gulf Coast Technology & Research Park DRI, adding 700,000 square feet of commercial to the growth parameters for TAZ 1387 with centroid connections from the TAZ to both Ben Hill Griffin Parkway and Alico Road. The model has loaded the majority of the trips from this TAZ to Ben Hill Griffin Parkway, which results in the two-lane piece of Alico Road east of Ben Hill Griffin Parkway not being shown as failing in the 2030 horizon. However, the TAZ 1387 growth parameters don't include the full level of development proposed for the Florida Gulf Coast Technology & Research Park DRI, with a buildout year of 2022. The model also doesn't reflect the access set-up envisioned in the DRI Master Plan, with one driveway connection to Ben Hill Griffin Parkway and seven driveway connections proposed onto Alico Road (six of which access the 103-acre parcel that is the subject of this plan amendment). Other comprehensive plan amendments, zoning and local development order approvals in the area have shown the two-lane piece of Alico Road between Ben Hill Griffin Parkway and Airport Haul Road as failing in the not-too-distant future with the addition of their development traffic. It is reasonable to expect that this DRI will also have that effect. The conversion of light industrial lands in the Tradeport category to something that would accommodate regional and community commercial development (and thereby increasing the trip generation potential) would only exacerbate that potential problem.

Alico Road is also an industrial corridor with significant truck traffic, including the majority of the mining traffic coming from the limited mining areas off of Alico Road allowed by the DR/GR plan amendments and code changes. Modifying 103 acres of Tradeport to allow more commercial development would cause more of a mixing of traffic types than we would otherwise expect, and could create the kind of safety concerns that are frequently noted by users of

Corkscrew Road to the south, particularly without the widening of Alico Road. On a two-lane undivided road segment such as Alico Road between Ben Hill Griffin Parkway and Airport Haul Road, there is no median so there is no limitation on the movements coming in and out of the seven entrances the applicant has proposed. This could create numerous conflict points with fully-loaded trucks that have difficulty slowing down, in terms of left turns across their path or right turns in front of them.

The MPO's 2030 Needs Plan does not include the widening of Alico Road east of Ben Hill Griffin Parkway; instead it includes the Alico Expressway to the north as a parallel improvement that addresses the demand. The Alico Expressway now appears to be an unlikely improvement given development patterns in the area, and LCDOT staff expects that the on-going update of the MPO plan to 2035 will drop the Expressway project and add the widening of existing Alico Road and its extension up to SR 82 (which was the subject of a recent County corridor alignment study). Whether the widening of Alico Road ends up in the new 2035 Financially Feasible Plan or the Needs Plan remains to be seen. However, in recognition of the importance of widening Alico Road in encouraging alternative energy research and development activities in this area and eliminating obstacles to their establishment, the County is proposing to fund the preliminary engineering/design/permitting effort for the four-laning of Alico Road from Ben Hill Griffin Parkway to Airport Haul Road in its CIP. Unfortunately, severely declining transportation revenues do not allow the County to fund the right-of-way and construction phases at this time.

Whether through this comprehensive plan amendment process (if approved) or the DRI process, the applicant should be required to address the need for future widening of Alico Road between Ben Hill Griffin Parkway and Airport Haul Road, the entire length of which this applicant owns frontage. The applicant could commit to pipeline his DRI proportionate share to the improvements, and/or provide right-of-way for the roadway widening and/or water treatment, or make a commitment to take the roadway drainage into the site drainage. The various land owners have not yet developed a cooperative approach to dealing with the issue. The County may consider the establishment of some sort of funding mechanism for the property owners in the area to help pay for the road widening and other infrastructure needs (i.e., water and sewer lines), such as an MSTU. Such a mechanism could allow for credits against future impact fees or DRI proportionate share obligations. This property owner should be required to participate in any such funding mechanism established by the County in the future.

Summary

Consistent with the requirements of the County's comprehensive plan amendment application, the lack of a specific financial commitment from the applicant to make the necessary roadway improvements by the 2030 time frame causes LCDOT staff to recommend not transmitting this amendment.

Please let me know if you need any additional information.

cc: Donna Marie Collins, Chief Assistant County Attorney
Brandon Dunn, Senior Planner, LCDCD

22734 R

INDUSTRIAL LAND USE NEEDS
IN THE LEE COUNTY COMPREHENSIVE
DEVELOPMENT PLAN

prepared for
LEE COUNTY, FLORIDA

by
Thomas H. Roberts
& Associates

atlanta

August 18, 1983

LEE COUNTY
PLANNING DIVISION

SUMMARY AND CONCLUSION

Lee County's economic base consists primarily of tourism, retirement, and related construction activities. These have been the chief contributors to the County's growth, and they can be expected to play a continuing, strong role in its economy. However, a long-term reliance on these sectors without major increases in other sectors would create major economic problems for the County's citizens and major fiscal problems for their local government.

Many of the jobs generated by tourism, retirement, and construction are low-paying, seasonal, and highly cyclical, and they generate relatively modest tax revenues. Moreover, their currently rapid rates of increase can be expected to level off in the long term because: (1) retirees are attracted by a pleasant climate, good public services and small urban size, but attraction diminishes as costs of living increase and urban areas become large; (2) tourism is over 70% water-oriented, and the County's inventory of developable water property is finite; (3) construction not only depends heavily on tourism and retirement growth, but it also diminishes as growing numbers of retirement units become available for resale because of retirees' relatively short life spans.

Lee County is also the manufacturing, wholesaling and distribution center of a rapidly growing Southwest Florida population market, and this role as a regional headquarters can only be enhanced by the recent opening of Interstate Highway I-75 and the new regional airport. Industrial sites will be needed for these growing activities.

But the County's economy needs to diversify even further, and its growing potential for attracting new, clean manufacturing activities offers such an opportunity. Compared to other economic base activities, manufacturing is relatively stable (i.e., non-cyclical), high paying, and nonseasonal, and it generates revenues needed to provide roads, schools and other public services. Moreover, manufacturing does not require in-migration for economic growth.

Without such a broadening and strengthening of the local economy, Lee County will be hard pressed to provide enough jobs for its own working-age labor force, and its economically active population will have to move elsewhere to find work.

Lee County's manufacturing employment, while growing rapidly in percentage terms, is still extremely low, not only when compared to the U.S. and the State of Florida as a whole, but even when compared to other similar Florida counties with a heavy reliance on retirement and tourism. In 1980, only 1.75% of the County's population worked in manufacturing jobs. With minimum growth in the manufacturing sector, this can be expected to rise to 2.04% by 2005, which is the target year for the Comprehensive Plan. With a very modest effort to attract industry this could rise to 3%. With a moderate effort it could become 5%. And a maximum but achievable goal would raise it to 7.5%.

At a minimum, even if there is no significant effort to increase manufacturing activity, there is a need to show 7,255 acres of industrial land (that is, light industry/research/related office districts) on the County's land use plan map. Based on 3%, 5%, and 7.5% manufacturing employment, this need increases to 8,257, 9,709, and 10,683 acres, respectively.

But just as important as providing an adequate amount of industrial district land is the need to save it in the right places, because of industry's special locational requirements.

Ironically, if Lee County errs in its long-term land use planning, it is less likely to be in the category of environmentally critical areas. That issue, while still shaky, has attracted strong public and governmental attention, and its importance is graphic. The greater risk is in the area of industrial land use planning, because the long-term economic and fiscal implications of being short-sighted in the preservation of enough good industrial sites seem remote and elusive today, and the problems faced by older retirement/tourism centers like Miami Beach and St. Petersburg seem far away.

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I. INTRODUCTION

In August of 1979 the Lee County Board of County Commissioners adopted a Comprehensive Development Plan in accordance with the State of Florida's Local Government Comprehensive Planning Act of 1975, as amended. This Plan consists of a text containing goals, objectives, policies, implementing actions and standards for land use, transportation and other plan components. However, it does not contain a land use plan map showing the type, intensity and location of various intended land use categories.

The County is now revising and refining its Comprehensive Development Plan, and a part of this refinement will be the addition of such a map.

The purpose of this report is to examine the need for including areas for future industrial development in the land use plan map and to give some indication of how much land should be included, and why, as well as general locational criteria.

The balance of the report is divided into four chapters and a series of supporting appendices. Chapter II presents an overview of Lee County's present economy, identifies some future economic problems that need to be anticipated and dealt with in advance if they are to be resolved, and spells out some of the adverse consequences of not doing so.

Chapter III identifies alternative courses of action that can be taken in order to forestall these problems, investigates the reasonableness of such courses of action, and lays a policy basis for proceeding to implement them.

Chapter IV presents a quantitative analysis of Lee County's future industrial land use needs on the basis of the various policy alternatives identified in Chapter III--in other words, how much industrial land is the County going to need to provide for in its Land Use Plan?

Finally, Chapter V deals with the equally important question of where these future industrial areas should be located, in view of the special locational requirements of industry and the importance

of identifying and protecting such areas well ahead of time.

Because of the extensive documentation accompanying these chapters, and in order to keep them as short and readable as possible, most of the supporting analyses, tables, and citations have been put into appendices.

At the back of the report is a selected bibliography listing many of the reference materials used in conducting this research. Except for local materials (i.e., from Lee County, Southwest Florida, and Florida) the reference most frequently relied upon is Urban Land Use Planning, by F. Stuart Chapin and Edward J. Kaiser, because this is the preeminent and most thorough treatise on the subject, although the Urban Land Institute, the International City Management Association, the American Planning Association, the National Planning Association, the author's own earlier work, and other sources are also extensively used.

II. THE LEE COUNTY ECONOMY AND ITS IMPLICATIONS FOR LAND USE PLANNING

Current Employment and Employment Trends in Lee County

In order to estimate how much industrial land Lee County will need in future years it is necessary to examine the County's economy as it now exists, the ways in which it has been changing, and the ways it might change in the future. Accordingly, probable or proposed future levels of "industrial" (that is, manufacturing, distribution, and related) employment can be estimated and translated into acreage needs.

Lee County's present employment base is typical of that of a fast-growing, predominantly retirement/resort/tourist community. Compared to "typical" American cities or to the nation as a whole, the County exhibits an extremely heavy reliance on retail trade, services, and construction activities. This is demonstrated by the following table, which shows that over 56% of the County's employment is in these three activities alone. Not surprisingly for a fast-growing, retirement oriented community, finance-insurance-real estate accounts for another 9% of the employment, so that the four sectors combined account for nearly two thirds (65%) of the County's employment.

In contrast, manufacturing, which is the mainstay of "average" urban areas and accounts for about 22% of total U.S. employment, represents only 5% of Lee County's employment.

WAGE AND SALARY EMPLOYMENT
IN LEE COUNTY: 1983

	Number of <u>Employees</u>	<u>Percent</u>
Retail Trade	18,060	22.7
Services	17,060	21.4
Government	12,070	15.2
Construction	9,490	11.9
Finance, Insur., & Real Est.	7,130	9.0
Transp., Commun., & Utils.	4,280	5.4
Wholesale Trade	4,160	5.2
Manufacturing	4,030	5.1
Farm	1,760	2.2
Other	1,300	1.6
Mining	<u>300</u>	<u>0.4</u>
Total	79,640	100.0

Source: National Planning Association analysis of U.S Census data.

The next table, which ranks these same activities in the order of their 1970-83 numerical increase, shows that this dependence on tourism, growth in retirement population, and related construction activity is not a new phenomenon in Lee County. Services, retail trade, construction, and finance-insurance-real estate accounted for 31,150--or 67%--of the new jobs created in the County during the last 13 years. Manufacturing accounted for 2,290 added jobs during this same period. This growth in manufacturing is a significant increase in absolute numbers and one which kept pace with population growth and obviously translates into the need for additional land for manufacturing activities, but it nevertheless constituted only 5% of the total increase in jobs.

GROWTH IN WAGE AND SALARY EMPLOYMENT
IN LEE COUNTY: 1970-1983

	<u>Number of Employees</u>		<u>1970-1983</u> <u>Increase</u>	
	<u>1970</u>	<u>1983</u>	<u>No.</u>	<u>%</u>
Services	5,850	17,060	11,210	191.6
Retail Trade	7,570	18,060	10,490	138.6
Government	5,520	12,070	6,550	118.7
Construction	4,300	9,490	5,190	120.1
Finance, Insur., Real Est.	2,870	7,130	4,260	148.4
Wholesale Trade	1,110	4,160	3,050	274.7
Manufacturing	1,740	4,030	2,290	131.7
Transp., Commun., Utils.	2,020	4,280	2,260	111.9
Other	530	1,300	770	145.3
Farm	1,590	1,760	170	10.7
Mining	<u>110</u>	<u>300</u>	<u>190</u>	<u>172.7</u>
Total	33,190	79,640	46,450	140.0

Source: National Planning Association analysis of U.S. Census data.

One might at first expect that this is because Lee County is in Florida, and Florida as a whole lags behind the U.S. in percentage of manufacturing activity. However, as the following table illustrates, while manufacturing is 22.4% of total nonfarm employment in the U.S. as a whole and 12.8% in Florida, it is only 5.7% in Lee County, or less than half of even the Florida percentage.

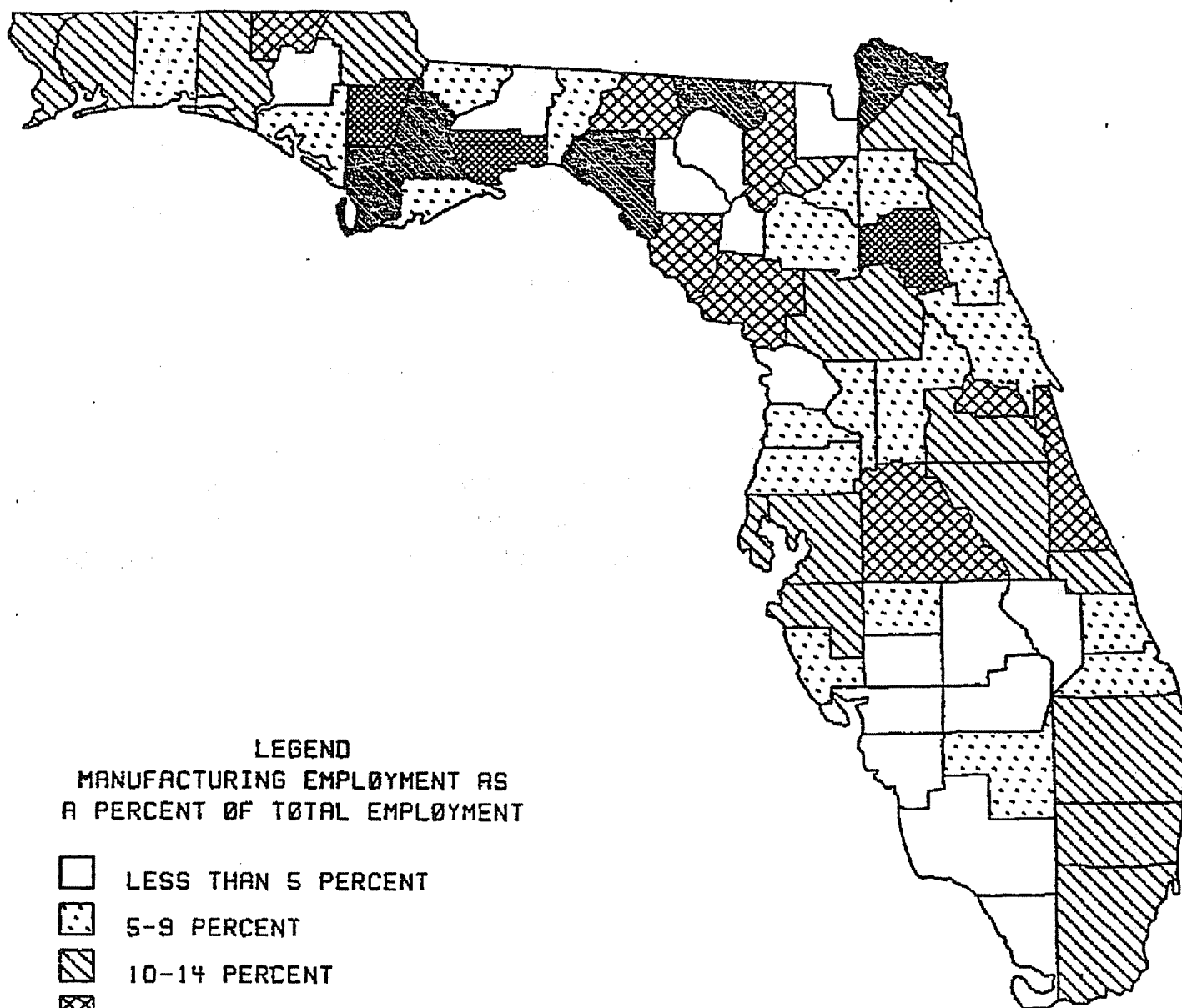
PERCENT DISTRIBUTION OF NONFARM
EMPLOYMENT IN U.S., FLORIDA, AND LEE COUNTY: 1980

	<u>U.S.</u>	<u>Florida</u>	<u>Lee County</u>
Trade	22.7	26.1	29.2
Manufacturing	22.4	12.8	5.7
Services (Incl. Mining)	20.7	23.1	21.3
Government	17.8	17.3	16.2
Finance, Insur., Real Est.	5.7	7.1	9.0
Transp., Commun., Utils.	5.7	6.1	5.9
Construction	<u>5.0</u>	<u>7.5</u>	<u>12.7</u>
Total	100.0	100.0	100.0







But even more significantly, when Lee County is compared only to other Florida counties with significant concentrations of retirement and/or tourism, it still ranks very low in its share of manufacturing employment. This is illustrated in the accompanying map.^{a)}

a) Excerpted from the Lee County Overall Economic Development Plan 1982 Update.

RELATIVE IMPORTANCE OF MANUFACTURING, 1979



LEGEND MANUFACTURING EMPLOYMENT AS A PERCENT OF TOTAL EMPLOYMENT

-  LESS THAN 5 PERCENT
-  5-9 PERCENT
-  10-14 PERCENT
-  15-19 PERCENT
-  20-24 PERCENT
-  25 PERCENT OR MORE

MINIMUM VALUE: 2 PERCENT
 MAXIMUM VALUE: 41 PERCENT
 MEDIAN VALUE: 9 PERCENT

Thus, while Lee and the two adjacent counties of Charlotte and Collier had less than 5% of their employment in manufacturing in 1979:

- o Sarasota, Pasco, Hernando, Martin, St. Lucie, Volusia, and Flagler Counties were between 5 and 9%.
- o Manatee, Pinellas, Indian River, Hillsborough, Dade, Broward, Orange, and Palm Beach Counties were between 10 and 14%.
- o And Brevard and Polk Counties were between 15 and 19%.

Basic and Non-Basic Activities

In order to understand the important linkage between a community's economic base and its land use plan it is helpful to understand the concept of "basic" and "non-basic" economic activities, not only as it relates to urban places in general but particularly as it relates to Lee County.

Basic activities are usually defined as "those activities which sell goods or services to consumers who live outside of the area"--that is, those activities that export products. Examples include: the automobiles which Detroit produces and sells beyond its borders; the port activities in New Orleans which serve people in other areas; films produced in Los Angeles; and steel produced in the Pittsburgh area.

However, for Lee County as for many Florida places, this definition needs to be revised because of the important roles that "transfer payments" (social security, medicare, pensions, etc.) and tourism play in bringing money into the area. Hence, for Lee County's purposes, basic activities are "those which sell goods or services to consumers who derive their income from outside the area." This would include not only manufacturing but also hotels, motels, amusements, and even retail stores to the extent that they sell to tourists and retirees.

Non-basic activities, on the other hand, are those which sell goods or services to local residents and which, in and of themselves, do not bring new money into the community but instead recirculate

money within the community. Many establishments are mixtures of basic and non-basic--e.g., restaurants and retail stores that sell to retirees and tourists (basic activity) and also to local employees (non-basic activity).

The important characteristic of basic activities is that they constitute the community's economic base, for without them there would be no economy--a community cannot live on recirculation alone. Hence, the addition of basic industry will employ more workers within the area, and since these workers and their dependents are also consumers they will require the usual array of services--barbers, retail clerks, police, firemen, and so on. Consequently, the addition of basic workers results in additional non-basic workers. As explained in a related report on the subject from which much of the above explanation is derived:

"Thus, the addition of basic workers will result in additional non-basic workers. The workers added may or may not have migrated to the area. The additional income originally earned by these new basic industry workers is subject to the multiplier effect. This effect describes the process whereby the income earned from exporting, which enters the local economy in the form of wages and salaries as well as the purchases of materials or dividends, becomes the income of other local residents who themselves do not engage in exporting. Both the basic sector and the non-basic sector, then, are related to external factors - the basic sector directly and the non-basic sector indirectly through the basic sector. As the demand for exports grows, the basic sector will also tend to grow. This, in turn, will tend to cause expansion in the supporting activities of the non-basic sector."a)

Hence, the two preceding tables in this chapter take on added significance. Lee County's preponderant employment in services, retail trade, construction, and finance-insurance-real estate is a direct reflection of the fact that Lee County's economic base rests heavily on tourism, retiree in-migration, and the real estate development activities attendant thereto, in contradistinction to manufacturing and other traditional urban economic base activities. This comes as no surprise to anyone familiar with Lee County.

a) The Broward Economy (see Bibliography).

Its significance lies, rather, in the implications for the future as discussed later in this chapter.

Industrial Employment Growth in Lee County

Before proceeding to the question of future implications, another point concerning Lee County's current growth picture needs to be made. As discussed later in Chapter IV and its appendices, "industrial" districts in the zoning or land use sense include much more than manufacturing employment: they also include sizeable shares of transportation-communication-utilities, wholesale trade, and construction employment. Moreover, as "industrial parks" continue evolving into "light industrial/research/business parks" they will also include a scattering of retail, trade, services, and other employment. Thus, while it is true that manufacturing employment per se grew by only 2,290 employees, or 131.7%, during 1970-1983, the employment of the type that will typically occupy future industrial districts grew by 8,842 employees, or 139.9%, during the same period. This means that even though manufacturing has been and continues to be a small part of Lee County's total employment, the need for future industrial district lands is much more significant than might otherwise be expected, even on the basis of current trends.

This analysis is included in Appendix II-A and summarized below:

	1970	1983	<u>1970-83 Increase</u>	
	<u>Empl.</u>	<u>Empl.</u>	<u>No.</u>	<u>%</u>
Manufacturing Employment	1,740	4,030	2,290	131.7
"Light Indust./Research/ Business Park" Type Empl.	6,321	15,163	8,842	139.9

If Current Trends Continue

Each year the National Planning Association (NPA) makes detailed projections of future employment distributions for the U.S., states, metropolitan areas, and counties. It uses a statistical model based on past and current U.S. Census data and "normal" expectations of future trends. NPA's most recent forecast suggests that by the year 2000, 1 out of 5 jobs in the U.S. will be located in Florida, Texas and California. A further analysis of its figures, however, indicates that it expects Lee County, which currently has about 1.75% of its population employed in manufacturing jobs, to increase this to only about 2.04% by the year 2000. This is, of course, based on the assumption that Lee County will do nothing to alter this trend over future years. The implications of this assumption are further discussed below.

Implications for Land Use Planning

As discussed above, Lee County's economy relies heavily on retirement, tourism, and construction for its economic life. Its reliance on manufacturing is extremely slight, not only when compared with the U.S. as a whole but also when compared with the rest of Florida. But what is even more striking, Lee County's manufacturing sector is quite small even when compared with that of similar Florida counties which, like Lee, are predominantly oriented toward tourism and retirement! Below is a discussion of these factors and their implications for the future that should be taken into account in Lee County's Comprehensive Plan.

Retirement. Lee County's very rapid growth in recent years is attributable mostly to the in-migration of retirees. As described earlier, retirees are, in effect, a basic economic activity because their money comes into the area from elsewhere and it generates local jobs in trade, services, government, construction, etc.

The greatest impact of the retirement industry is its impact on construction at the time the retirees first move in. If the

rate of retiree in-migration decreases, this construction employment is lost without a corresponding increase in some other employment category. In contrast, when manufacturing (for example) moves into the County, it too generates construction employment, but when the construction is completed its employment is replaced by an even greater level of production employment. In addition, the limited life span of retirees means that large numbers of the retiree dwelling units now being built annually will increasingly go on the resale market, which will reduce the economic stimulus due to new construction.

Another concern is that retirees have an important impact on the County's tax base. Not only do they receive homestead exemptions but there is no corresponding place of employment which is subject to taxation.

Finally, the rate of retiree in-migration does not continue upward forever. Retirees are typically attracted by a warm climate and the provision of good services at low cost, and they are repelled by a high cost of living and large urban size. As Lee County continues growing in population size and urban extent, the growth of its retirement industry can be expected to level off.

While retirement should and will continue to be a valued sector of the Lee County population and economy, it would clearly be to the County's advantage to balance and diversify its economy and tax base through the expansion of other economic sectors.

Tourism. The other important growth industry in Lee County is tourism. As with the retirement industry, the attractiveness of Lee County as a place to live and visit, plus the County's heightened awareness of the importance of preserving environmental amenities, will insure that tourism continues to play a vital role in the County's economy. However, its rate of increase as a growth industry will probably not continue unbridled. Seventy percent of Florida's tourism is water-oriented. It is reasonable to assume that at least this much--and probably more--of Lee County's tourism is water-oriented. Even though Lee County has much more total land area than it can possibly fill up in the

foreseeable future, the County's supply of unused water-oriented properties is finite. The limitation on this resource is, if anything, intensified by the increasing environmental constraints that are imposed on development, in terms of where development can occur, under what circumstances and at what densities.

Moreover, tourism has some drawbacks as an economic base: (1) it is a low wage industry; (2) it is seasonal; and (3) it is very cyclical in response to national economic conditions.

Hence, as with retirement, the County should continue to foster and strengthen its tourism base while at the same time looking for ways to balance and diversify its economy in other ways.

Construction. The construction industry is a major employer in Lee County, accounting in 1983 for 11.9% of all employment. As pointed out earlier, most of this is attributable to the growth of the retirement and tourism industries.

Nationally, between 5 and 6% of the employed labor force is engaged in construction. As a general rule an urban area with more than this portion is growing, whereas one with less is declining. By this criterion, Lee County is clearly in a strong growth phase. But a continuation of these high levels of construction activity over the long term is doubtful. For example, Broward County, whose traditional economic base is similar to Lee's but which is in a later stage of development, had an extremely high rate of construction employment during its period of high growth in the early 1970's. But by 1980 construction's share of total employment in Broward had dropped by 14%.

In conclusion, a diversification and broadening of Lee County's economic base would : (1) provide jobs for Lee County's working age population who otherwise will have to move out of the County in search of job opportunities; and (2) increase the tax base in order to keep taxes on residential property

from rising inordinately. If this does not occur, such as through efforts to attract industry as discussed in the next chapter, then either (1) residential tax rates will have to rise, or (2) needed capital improvements such as roads and schools will have to be deferred or eliminated in order to keep property tax rates low. However, the deferral of needed capital improvements would make Lee County less attractive to economic (e.g., industrial) growth (which, ironically, will eventually lead to increased residential taxes!) The recent move of electronics industries (valued for their cleanliness and high pay) from San Jose and Santa Clara to such places as Boise, Salt Lake City, and Phoenix, in part because of congested roads and schools, is testimony to this. Closer to home, the fiscal dilemmas faced by Miami Beach and, more recently St. Petersburg, because of a lack of any long term effort to balance their economies, offer a poignant lesson to Lee County.

III. POLICY RECOMMENDATIONS

The findings of Chapter II suggest that Lee County should broaden its economic base in ways that will supplement the County's currently heavy reliance on tourism, retirement and related construction activities, such as by expanding and strengthening the manufacturing and related sectors of the County's economy. This is not a new idea. Later sections of this chapter identify the substantial, official policy basis that already exists for increasing the County's manufacturing sector and reconfirm the feasibility of doing so. First, however, the desirability of such a course is reviewed below.

Desirability of Increasing Manufacturing Activity

Lee County is going to continue to need to provide jobs for people entering the labor force if it is to prevent the out-migration of the economically active segment of its population. In 1983, for example, the County's has about 56,000 people age 19 or younger.^{a)} The now prevailing industries of tourism, retirement, and construction will, of course, absorb much of this emerging labor force. But on the basis of the discussions set forth in Chapter II, it can be seen that there are two sets of limitations connected with this type of employment. First, many of these jobs tend to be low paying, seasonal, and cyclical. Second, as these sectors grow at slower rates and eventually level out, in the long term, even these jobs will become more scarce. The net long term result of these combined factors means fewer jobs, lower paying jobs, and increased taxes on residential property and/or reduced public services.

The advantages that manufacturing jobs have over those in the tourism, retirement and construction industries is that: (1) on the average, they are higher paying, non-seasonal and more stable; (2) they "pay their way" by providing a good tax base; and (3) they do not require in-migration for their markets.

a) NPA current estimate.

The importance of these considerations in setting a community's land use planning goals are summed up by Chapin and Kaiser as follows:

"Goals for Economic Development and Work Areas. A stable and diversified metropolitan economy emphasizing (a) an industrial mix minimally affected by cyclical fluctuations; (b) a makeup of trade and services capable of serving all basic needs of residents and businesses in the trade area; (c) an employment structure and a range of wage scales commensurate with skills and experience of the area's labor force; and (d) sites for work areas accessible to worker housing, energy-efficient in location, environmentally suitable for development, cost-effective to serve with infrastructure, and compatible with surrounding areas."

One of the reasons for the extensive documentation in this study for an objective whose desirability would be obvious in most communities is that Lee County officials can always expect a certain amount of deep-seated, automatic opposition to industrial development from people who either do not understand the dire fiscal and economic implications of their position or don't care. Much of this is understandable when one realizes that the word "industry" or--more specifically, "manufacturing"--conjures up an image of the very thing many Lee County residents deliberately moved away from: ugly, crowded, dirty, noisy, smelly factories. But that view is not at all representative of modern, low density, attractive, and environmentally pleasing manufacturing activities of the type that can be attracted to Lee County today and in the future. As summarized by a report prepared for the Lee County Industrial Development Authority by the Fantus Company:

"...much of the opposition to industrial expansion in Lee County stems from outdated impressions of the environmental effects of manufacturing operations. Many area residents formerly lived in northern cities, which have experienced serious industrial pollution problems. They are fearful that Lee County's environment could be damaged by an influx of new industry. This attitude is reflected in newspaper editorials and statements by public officials suggesting that only "clean" industry should be encouraged to locate in the county. (In reality, advancements in pollution control technology have made it possible for virtually any type of

manufacturing operation to be environmentally clean.)"

Existing Policy Basis for Increasing Manufacturing Activity

The official policy basis for accommodating increased manufacturing activity in Lee County's Comprehensive Plan already exists. More specifically, Appendix III-A identifies a series of official policy bases at state, regional and local levels which speak clearly to the need for industrial development. They reflect a continuing awareness and commitment on the part of public officials to the need for attracting a diversity of activities that will provide adequate jobs, economic stability and fiscal solvency. Sources quoted in this appendix include:

- o Office of the Governor, State of Florida Office of Planning and Budget
- o Southwest Florida Regional Planning Council
- o Lee County Industrial Development Authority
- o Lee County Overall Economic Development Program Committee
- o Lee County Board of County Commissioners

Feasibility of Increasing Manufacturing Activity

Assuming that the goal of increased manufacturing and other industrial activities is a desirable one, and assuming further that there exists an adequate policy basis for reflecting this goal in the Comprehensive Plan and its land use plan map, there remains the matter of feasibility. Southwest Florida and Lee County are known as popular retirement, resort, and tourist centers, not as industrial centers, and it is important to understand that this can and should change over time. This section briefly summarizes Lee County's economic character, strengths, weaknesses, and potentials as a background for evaluating the likelihood of maintaining and increasing its manufacturing, wholesaling, distribution, and related industrial activities.

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Lee County is clearly the wholesaling and distribution center of Southwest Florida. With a little over one-third of the region's population, Lee County contains 40% of all wholesaling firms in the region and 47% of the large (20+ employees) ones. Lee also leads the region in manufacturing with 44.5% of the firms and 43.3% of the employment.

Although manufacturing is still a relatively small part of the Southwest Florida economy, it has been growing rapidly in percentage terms. From 1970 to 1980 the region's manufacturing employment nearly doubled--from 6,480 employees to 12,270. But Lee County accounted for the largest part of that growth, with a 222% increase. The County's leading manufacturing operations are: stone, clay and glass products; printing and publishing; lumber and wood products; fabricated metal products; electric and electronic equipment; medical and other instruments; petroleum and coal products; food and kindred products; and transportation equipment.

As an interesting side note, it will be recalled from an earlier section that Lee County's present reliance on such sectors as construction creates problems of cyclical vulnerability. Accordingly, during 1974-79, while the County's total non-farm personal income rose by 98%, construction personal income increased by less than half, while manufacturing personal income more than doubled!

At one time it was believed that Southwest Florida had relatively little potential for manufacturing, because: (a) it had no natural resources; and (b) it was not close to the center of national consumer markets. Neither of these is any longer applicable. Manufacturing is far less resource and market oriented than it once was. To a great extent it can locate where it wants to locate, and the same "good life" amenities of a pleasant climate and other features that attract retirees and tourists to Florida are also important to industrialists and their employees.

In fact, past impediments to industrial growth in South Florida were less due to a lack of resources and central location than they were to lack of a skilled labor force, lack of an adequate infrastructure to support manufacturing operations, and a relatively low purchasing power in local markets. Not only have these impediments continued to vanish rapidly, but the proximity of South

Florida to Latin American markets is growing in significance.

The industrial potential of Lee County's transportation facilities, including newly opened Interstate Highway I-75 and the new regional airport, are impressive. They have been amply described in other reports and need not be repeated here.

Detailed descriptions can be found in:

- o The Southwest Florida Economy, Regional Comprehensive Plan Series. Southwest Florida Regional Planning Council. 1982. Pp. 59-63.
- o Overall Economic Development Plan Update. Lee County. 1982. Pp. 141-142.

Last year the Fantus Company produced a report^{a)} for the Lee County Industrial Development Authority, which reviewed the County's advantage as a location for industry. The report provides a ready checklist of various reasons why Lee County can become an increasingly attractive site for industry. Topics covered include:

- o Labor market
- o Labor costs
- o Labor attitudes
- o Vocational education
- o Quality of Life
- o Transportation
- o State and local business climate

The report points out that Lee County's "manufacturing sector is a small but highly diversified part of the local economy. A wide variety of products are manufactured in the county, including medical equipment, quartz crystals, electronic instruments, industrial filtration systems, fiberglass boats and pre-engineered steel buildings."

The County's industrial location advantages are also pointed out in the text accompanying the Chamber of Commerce's industrial

a) Industrial Location Advantages of Lee County. The Fantus Company. Chicago. 1982.

site map and in other publications.

Not to be overlooked are the County's industrial location disadvantages. The Fantus Company produced a companion report^{a)} to the one above, on this subject. The primary disadvantages that were identified are: (1) distance to northeastern, midwestern, and western markets resulting in relatively high shipping charges to these regions; (2) high cost of electric power; (3) lack of natural gas service; (4) inadequacies of public sewerage systems. It is clear, however, that in balance these disadvantages do not negate Lee County as a good place for industrial development. What they do, instead, is indicate: (1) which industries the County should or should not seek or expect, and/or (2) steps that can be undertaken to overcome the disadvantages.

The report presents some strong opinions on "Industrial Sites--The Problem" which, because of their relevance to the question of land use planning and zoning, are quoted below:

"The present industrial site situation in Lee County must be rated as generally unsatisfactory. Although the county contains about 5,000 acres of industrially zoned land, only a small fraction of this acreage has actually been developed for industrial use. Very few of the sites currently on the market are likely to be attractive to manufacturers seeking locations for branch plants of any significant size.

"Traffic problems and the encroachment of commercial and residential development on industrial site areas are obstacles to further expansion of manufacturing facilities in the urbanized portion of the county. In addition, land costs at prime urban locations have risen to prohibitive levels. (Asking prices for vacant industrially zoned parcels in Fort Myers range as high as \$4.50 per square foot). Site possibilities in rural Lee County are restricted by road access and utility service problems.

"Potentially, the most advantageous location in the county for new industry is the Interstate 75 corridor. The expressway is uncongested and provides rapid access to the new regional airport. The area along I-75 is free of existing development incompatible with industry, and land prices are substantially lower than in the urban centers of the county. Unfortunately, most of the land which has

a) Industrial Development Problems and Priorities in Lee County, Florida.

been developed for industrial use in the I-75 corridor has either been sold or divided up into small parcels. (Only 25 acres remain on the market at Interstate 75/Bay Shore Industrial Park, and the largest available parcel at Billy Creek Commerce Center contains about 20 acres).

"A large amount of acreage will be made available for light industrial use in the planned development near the regional airport which has just been announced by Westinghouse. However, this project will not provide any near term relief for the site shortage. Westinghouse anticipates a lead time of eighteen months for the completion of the planning and permitting process prior to commencing the development work.

"The site development outlook for the interim is highly uncertain. While extensive tracts of raw land along I-75 are available for sale to industry, the feasibility of extending utilities to these properties has not been determined. Several large industrial parks are reportedly in the planning stage on or near the expressway, but no definite time table for any of these developments has been announced.

"Uncertainty also exists as to the attitude of local government towards projects of this type. Industrial site development in Lee County has been hindered by complicated zoning and permitting procedures which have tended to be applied in a restrictive manner. An industrial park owner informed Fantus that the implementation of his development plan had been delayed for three years by zoning and related problems. In another case, about one year was required for the completion of the various procedures leading to the approval of an industrial park project. One plan for a major industrial park has been stalled for two years pending authorization of a needed change in zoning classification.

"The proposed new development code for Lee County is designed to introduce greater flexibility into the zoning process. Also, the County Commission has recently adopted procedures for expediting zoning hearings. Obviously, it is too early to assess the probable impact of these new approaches on industrial site development."

A "Lee County Port Feasibility Study" was produced in 1982,^{a)} which found that a market now exists for a liquid bulk facility that could handle petroleum products including gasoline, diesel fuel,

a) Lee County Port Feasibility Study, Prepared for the Lee County Port Authority, by PRC Harris (Fort Lauderdale, Fl.) and Russell and Axon (Daytona Beach, Fl.). 1982.

and jet fuel for the immediate area. A projected 50 tons/year of fish was also found probable in conjunction with a seafood industrial park that would include an ice plant, refrigerated warehouse, canning plant, fish meal facility, and fishing boat servicing. The report also suggested that a terminal or port facility might attract other uses. One interesting facet of this study is that it identifies a market area for Lee County port activities that, except for Tampa and Miami, include all of the area within an arc reaching north to Manatee County and northeast to St. Lucie County. The study also recommends the establishment of a foreign trade zone to promote industry and commerce in Lee County.

Some observers of the economic scene (e.g., Fishkind)^{a)} are downright bullish about the industrial future of Southwest Florida, pointing out the analogy between I-95 on the east coast and the newly opened I-75 on the west coast, and anticipating, among other things, a field day for electronics manufacturing.

The Southwest Florida Regional Planning Council's 1980 report on Commercial and Industrial Strategies sums up its outlook as follows:

"Lee County does possess many advantages and inducements to economic development, in addition to the amount of land available. Community facilities, services and infrastructure are relatively well-developed, and the County's position as the major growth center in the Region provides another inducement to further economic development."

In order to realize its economic development potential, Lee County will have to provide--through its land use plan and related implementation measures--adequate and well situated industrial sites, as discussed in Chapters IV and V. But just as importantly, there will have to be adequate provision of housing, roads, schools, and utilities. Without that, industry in general and highly desired industries such as electronics in particular will simply not move in, just as they have left other areas for the same reasons. Fortunately, however, the same industrial development that requires good community facilities also provides the financial basis for providing them.

a) Henry Fishkind, Director, Bureau of Economic and Business Research, University of Florida.

Alternative Policy Assumptions for Increasing Manufacturing Activity

Lee County now has about 1.75% of its population employed in manufacturing jobs. "Normal" projections, assuming no concerted effort to increase this figure, show an increase to 2.04% by 2005, the target year of the Comprehensive Plan. Broward County--which is much larger than Lee and in a later stage of development, but which has historically shared Lee's basic economic underpinnings of retirement, tourism, and construction--has adopted a Year 2020 goal of having 7.5% of its population employed in manufacturing in order to forestall the problems of such places as Miami Beach and St. Petersburg as these traditional economic sectors mature. This goal is quantitatively reflected in Broward County's land use plan.

In order to bracket the land use implications of alternative economic policies, Chapter IV (following) carries forward four assumptions as to what Lee County's future manufacturing employment levels might be by the year 2005. They are:

- o 2.04% of the population, which is viewed as a minimum, assuming no policy intervention whatever;
- o 3%, which assumes an extremely modest effort to attract and accommodate manufacturing;
- o 5%, which assumes a moderate effort; and
- o 7.5%, which is viewed as a maximum but achievable goal.^{a)}

a) An earlier survey conducted by the author identified, for example, the following recent percentages in other areas: Phoenix (urban planning area), 5.8%; Houston region (6 counties), 7.4%; Seattle (King County), 8.5%; Atlanta region (7 counties), 8.6%; Charlotte (Mecklenburg County), 10.6%; Snohomish County (near Seattle), 12.6%.

IV. QUANTIFICATION OF INDUSTRIAL LAND USE NEEDS

Estimates of the amount of industrial district land that should be indicated on Lee County's land use plan map can be computed by means of the following steps:

- o Project the future number of employees that will occupy industrial districts over the term of the planning period.
- o Estimate what the average industrial district density (as measured in employees per gross acre) will be.
- o Divide the future number of employees by the density to yield the estimated number of acres that will be developed as industrial districts.
- o Multiply the estimate of developed industrial acreage by a safety factor to produce an "industrial reserve" that will be adequate to accommodate the possibility that:
 - (a) growth will occur faster than anticipated and/or
 - (b) densities will be lower than anticipated.
- o Multiply the above acreage by a flexibility factor to allow for the potential unavailability of certain sites when and where needed, thereby producing the total number of acres that should be indicated for industrial districts on the Land Use Plan map.

These steps are summarized below and amplified in corresponding appendices.

Industrial District Employees

As discussed earlier, Lee County needs to decide to what extent it can and will broaden and diversify its economic base over the planning period by promoting an increase in manufacturing employment, in order to forestall serious fiscal and social problems. One possibility is that the County will accept current trends in this respect, allowing most manufacturing jobs that could be attracted to Lee County to go elsewhere instead. In that case, Lee County could expect about 2.04% of its population to be working in manufacturing jobs by the year 2005. A second assumption is that the County will successfully implement a policy to gradually increase this percentage to 3% over the next 22 years.

A third assumption is that it will increase it to 5%. Finally, a fourth assumption would raise Lee's manufacturing employment to 7.5%, which is ambitious but not impossible when compared to other comparable areas.

Depending on which of these assumptions occurs, the corresponding total employment that can be expected to locate in industrial districts in the year 2005 is as follows:

<u>Percent of Population in Manufacturing Jobs in 2005</u>	<u>Corresponding Total Employment in Industrial Districts</u>
2.04%	30,095
3.00	35,569
5.00	40,807
7.50	49,856

The derivation of these figures is explained in Appendix IV-A.

Industrial District Densities

In order to convert the above employment figures to corresponding acreages of industrial district land it is necessary to divide them by the estimated average density (as measured in employees per gross acre) that will prevail in Lee County's industrial districts in the year 2005.

Industrial employment densities vary a great deal from time to time, from place to place, and with the nature of the industrial activity. For that reason, Appendix IV-B presents a somewhat extensive analysis of this subject, and it concludes that the probable average gross industrial district density for Lee County, for land use planning purposes, should be approximately 7 employees per gross acre (with most industrial areas in the County falling between 5 and 10 employees per gross acre, which is the equivalent of approximately 6 to 13 employees per net acre).

Total Industrial Acreage to be Included in the Land Use Plan

The projected industrial district employment can now be divided by the estimated gross density to produce an estimate of the number of acres that will actually be in industrial development by 2005. This acreage must then be multiplied sequentially by two factors: (1) a safety factor to cover the possibility that needs have been underestimated -- that is, that industrial development will occur faster than expected during the planning period and/or that densities will be lower than anticipated; and (2) a flexibility factor to allow for the fact that certain sites will not be available when and where they are needed. These factors are further documented in Appendix IV-C, which also shows the calculations used to arrive at acreages. Depending on the assumed percentage of population that will be in manufacturing jobs by the year 2005, the amount of industrial district land that should be provided for on the Land Use Plan map is as follows:

<u>Percent of Population in Manufacturing Jobs in 2005</u>	<u>Corresponding Industrial Acres in Land Use Plan</u>
2.04%	7,255 acres
3.00	8,257
5.00	9,709
7.50	10,683

Some Key Observations

The following table summarizes certain figures drawn from the appendices accompanying this chapter in order to illustrate several points.

(I) Assumed Mfg. Empl. as a % of Total Pop.	(II)		(III)		(IV)	(V)	(VI)	(VII)
	<u>Indust. Dist. Empl.</u>		<u>Other</u>		<u>Total</u>	<u>Acres Developed</u>	<u>Acres on Plan</u>	<u>Acres on Plan as a % of Tot. Co. Area</u>
	<u>Mfg.</u>							
2.04	7,384		22,711		30,095	4,299	7,255	1.44
3.00	10,858		22,711		35,569	5,081	8,257	1.64
5.00	18,096		22,711		40,807	5,830	9,709	1.81
7.50	27,145		22,711		49,856	7,122	10,683	2.13

Column I simply lists again the four alternative assumptions as to manufacturing employment levels. Column II shows the corresponding numbers of manufacturing employees, which increase proportionately to the percentages in Column I. However, note that Column VI (industrial acreage to be shown on plan) does not increase proportionately to Column I or II. That is, a major increase in assumed levels of manufacturing employment creates only a moderate increase in the industrial acreage to be shown on the plan. There are two reasons for this. First, the non-manufacturing employment in industrial districts (Column III) stays constant and therefore has a moderating effect on the rise in total industrial employment (Column IV). This is consistent with the fact that induced increases in manufacturing employment would represent jobs that are added to the economy (in order to stem out-migration of working-age County residents), not jobs being transferred from non-manufacturing sectors. Second, the safety factor (as distinguished from the flexibility factor) described in Appendix IV-C is on a sliding scale and tends to flatten out the acreage increase as the assumed manufacturing level increases. Hence, with only a modest manufacturing employment of 2.04% of the population, there is an indicated need for 7,255 acres on the plan, and with a 7.5% manufacturing level (nearly a quadrupling), that need only rises to 10,683 acres (barely a 50% increase).

A second important point illustrated by this table is that, based on a total County land area of 502,400 acres, Column VII shows that only 1.44 to 2.13% of the County needs to be indicated for industrial use under any assumption.

Finally, there is included in Appendix IV-D an analysis that shows industrial land as a percentage of all developed land in various types of urban areas. It is recommended that once one or more land use plan configurations or calculations have been developed for Lee County showing all proposed developed land for the year 2005, the appropriate acreage figure from Column V (not Column VI) be expressed as a percentage of all proposed developed land and used as a rough check as to its order of magnitude compared with the current ranges in other urban areas.

V. LOCATIONAL REQUIREMENTS

Just as Chapter IV deals with the questions of how much industrial land should be identified in Lee County's Land Use Plan, this chapter deals with the equally important question of where it should be located. A number of years could pass before Lee County begins to feel effects of the economic problems discussed in Chapter II. But when that time comes and the County's economy needs additional manufacturing, distribution, and related activities to complement or supplant its growth in retirement, tourism and construction activities, it will be important to have the right land in the right places.

Whenever a proposal comes along to use industrially designated land for some non-industrial use, it will be tempting to permit it, on the grounds that the County has a great deal of vacant land and that will continue to be the case for many years. But, as pointed out in Chapter IV, the amount of land that is needed to provide for eventual industrial use is a tiny percentage of the County's total land area, and it is very important that it be available when and where it is needed.

Chapin and Kaiser stress the importance of industrial land use planning by stating that it should receive top priority, preceded only by environmentally critical open space:

"Open space for environmentally critical areas and regional urban needs should be given first consideration. Regionally oriented urban land uses and facilities are considered next. These include centers of employment such as industrial and wholesaling categories of land use, regional commercial activities and centers, and regional facilities such as airports, waste-treatment plants, colleges, medical care centers, and the like. The third major category is termed residential communities and includes housing as well as local population-serving activities and facilities such as local shopping and recreational facilities, elementary schools, and smaller-scale open spaces."

Below is the entire hierarchy of major land use categories listed in their order of planning priority, again pointing up the need for preferential treatment for industrial activities:

- "1. First consideration for locational needs is open space for critical environmental processes.
- "2. Second in order of locational consideration are regionally oriented activity centers and facilities, including:
 - A. Economic-base and other major employment activities
 - 1) Manufacturing areas
 - 2) Wholesale and related-use areas
 - 3) Others unique to particular urban areas
 - B. Region-serving business areas (mainly retail and offices)
 - 1) Central Business district(s)
 - 2) Satellite centers
 - a) Older business centers
 - b) Newer regional shopping and multifunctional centers
 - c) Office centers
 - 3) Highway service centers
 - 4) Other (a residual category)
 - C. Region-oriented recreational, educational, and cultural facilities and public service facilities
- "3. Third in order of locational consideration are the residential community areas, including:
 - A. Housing
 - B. Local, residentially oriented activities and facilities such as
 - 1) Schools
 - 2) Local shopping
 - 3) Playground areas
 - 4) Open space"

Accordingly, since "economic-base and other major employment activities" (e.g., manufacturing, wholesale, and related-use areas) deserve high priority in the land-use designation process, it is especially important to consider the special locational criteria of these areas. In this regard, Chapin and Kaiser point out that work areas, including manufacturing and wholesaling,

"...are not oriented to local consumers and are relatively unconstrained in local site selection by problems of access to local markets. Their employment levels are primarily dependent on events outside the local economy. While not particularly oriented to the local urban spatial structure of activities, employment-oriented land uses generally make some of the toughest site and location demands regarding size of parcel, topography, transportation facilities, and utilities such as water and sewers. In addition, they help to spatially structure the urban activity system with respect to a most important transportation consideration--the journey to work. Thus tentative locations for employment will help determine desirable locations of residential areas."

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They also point out the importance of

"...(making) estimates of linkages among centers and between them and the utilities, transportation, labor force, and other elements of urban spatial structure. Out of this would come not only an understanding of the current structure from which the future must begin, but also some assessment of specific problems. For example, it might reveal areas which are advantageously located but suffer service deficiencies."

Detailed Locational Criteria

Appendix V-A sets forth the most commonly used criteria for locating sites for manufacturing, wholesaling, and related uses. These criteria deal with topographic considerations; the need for a choice of locations; accessibility by truck, air, deep water, and rail; commuter access to for home-to-work trips; utilities; greenbelts and other amenities; and air and water quality considerations.

Appendix V-B contains an older (1959) but somewhat more detailed and still valid set of industrial locational criteria. Appendix V-C contains the industrial park criteria and standards of the National Association of Industrial Parks as included in the Southwest Florida Regional Planning Council's Commerical and Industrial Strategies (June 1980). In addition, the industrial site location/development standards of Lee County's Comprehensive Development Plan adopted in 1979 are contained at the end of Appendix III-A.

Chapin and Kaiser also point out that

"...for general planning purposes...the public interest is better served by a wide spatial distribution of more modest industrial parks and industrial sites than by a few very large ones. In identifying acreages...for possible development as planned industrial districts, the land use plan must not only take topographic, transportation, utility, and other requirements normally associated with studies of industrial needs into consideration, but it must also give special attention to land ownership patterns. Property with clear land titles is an important consideration affecting the feasibility of developing such districts.

The following excerpts from ICMA's The Practice of Local Government Planning (1979) are also apt for Lee County's industrial land use planning purposes:

- o "The growing versatility of truck transport has reduced dependency on railroad service..."
- o "Large one story buildings are necessary to house production lines. Materials storage areas, truck loading berths, and employee parking areas greatly increase the need for spacious sites."
- o "With the exception of very large plants and those that require free-standing sites because of their need to be close to raw material sources or because of their incompatibility with other plants, industrial parks provide the most advantageous locations because they are designed to meet the requirements of modern industries. Operating efficiencies can be gained and conflicts with neighbors can be avoided when an area is especially planned to accommodate industrial development. Interdependent plants can take advantage of opportunities to cluster in close proximity. For example at Tampa Industrial Park two major breweries are served by a glass manufacturing plant and a brewer's grain supplier located in the same industrial park."
- o "Proximity to airports, both for air shipments and executive travel, is considered desirable by many industries. Locations adjacent to freeways offer several kinds of advantages. Time savings in truck transportation result in lower costs and expanded market areas. The labor market area also expands as the time-distance to the work place decreases. Certain industries benefit from the advertising value of visual exposure to a freeway, particularly if their plants are sources of pride. If an industrial park in an urban area is sufficiently large and intensively developed, it will be able to obtain transit service which can result in significant cost savings both directly for employees and indirectly for employers."
- o "Industrial park sites must be relatively flat and well drained. Land coverage by large buildings, storage areas, and parking lots creates storm water runoff problems that must be solved. Water supply, sewerage, and gas and electric service need to be available or easily extended to the site."
- o "Flexibility is the key to planning industrial parks, because it is virtually impossible to predetermine the precise site requirements of individual plants. An

industrial park should be sufficiently large and should have a configuration that will accommodate a variety of types and sizes of plants. The area can be as small as fifty acres, or as large as thousands of acres, assuming that it is realistic to anticipate development at such a large scale."

- o "It is usually advantageous to estimate the need for industrial sites fairly generously and to plan a number of different locations for industrial parks, unless competing land uses would be shortchanged. An adequate or more than adequate supply of industrial land will ensure that there will not be future shortages and resulting high prices which will discourage development. A variety of locations makes it possible to accommodate different types of plants which may have mutually incompatible features. However, industrial sites should not be so widely scattered or so distant from other planned urbanization as to result in unnecessarily high public costs for street maintenance, utilities, and police and fire protection."
- o "Not to be overlooked is the importance of reserving room on the site for possible future plant expansion."

Long-Term Staging of Industrial Development

Implicit in the concept of reserving land for future industrial development is the importance of protecting it from pre-emption by other types of development such as residential or commercial projects. To permit such development would for all practical purposes eliminate the land from consideration for subsequent industrial development, because (a) the cost of razing and redeveloping the land would become prohibitive, and (b) such latter-day re-use would upset previously established land use patterns and create new frictions between neighboring land uses, thereby flying in the face of sensible advance land use planning.

What, then, is the status of such land in the meantime? It has long been common in older, northern cities to deny industrial use of a property designated for eventual residential development even though the owner might otherwise realize an earlier profit from commercial or industrial use. Similarly, in Lee County and other urban communities facing a "new generation" of economic development considerations, it is equally reasonable--and even more

important--to zone or otherwise protect land from residential or commercial pre-emption in the interest of eventual industrial development.

Chapin and Kaiser confront this question in discussing the major functions to be served by open space by suggesting that one such legitimate function is to use open space as a transitional use awaiting ultimate development, to wit:

"Reservation of land for future urban development (utilizing open space only as a transitional use)--to preclude premature development of sites earmarked for future schools, roads, utility rights-of-way, parks, zoos, reservoirs, water and sewer treatment plants, and other public uses, or even for general future urban development. Although used only sparingly in the past, this open-space concept is becoming more frequently applied and if land banking for general growth management purposes becomes an accepted development guidance device (American Law Institute 1976), it may become an increasingly important category of open space."

Then, again, they suggest that the category of "Land Reserved for Regional and Community Open-Space Purposes" should include "areas being reserved for future urban development, from which development is precluded in the meantime."

Vancouver, B.C. has developed a site classification system for the long-range staging of industrial land development which, with some judicious adjustment to Southwest Florida's special circumstances, could be applied in Lee County. The system contains a map containing all land identified for future industrial purposes, and within the map the sites are categorized as follows:^{a)}

Stage 1

- o Full development of central easy sites plus upgrading of developed central areas.
- o Some development of non-central easy areas.
- o Full development of central difficult areas.
- o Some development of central difficult areas.

a) For a fuller understanding of this system see pp. 416, 418, and 419 of Urban Land Use Planning (listed in the bibliography).

Stage 2

- o Full development of non-central easy areas.
- o Full development of central difficult areas.
- o Some development of non-central difficult areas.

Stage 3

- o Full development of non-central difficult areas plus continued upgrading and renewal of developed areas.

APPENDIX II-A

GROWTH IN "LIGHT INDUSTRIAL/RESEARCH/BUSINESS

PARK" TYPE EMPLOYMENT IN LEE COUNTY: 1970-1983a)

	1970 Empl.			1983 Empl.			1970-83 LIRB		
	Share in		No. in	Share in		No. in	Empl. Increase		
	Tot.	LIRB ^{b)}		Tot.	LIRB		No.	%	
Farm	1,590	.00	0	1,760	.00	0	0	0	.0
Mining	110	.10	11	300	.10	30	19	172.7	
Construction	4,300	.20	860	9,490	.20	1,898	1,038	120.7	
Manufacturing	1,740	.90	1,566	4,030	.90	3,627	2,061	131.6	
Transp., Comm., Utils.	2,020	.90	1,818	4,280	.90	3,852	2,034	111.9	
Wholesale	1,110	.50	555	4,160	.50	2,080	1,525	274.8	
Retail	7,570	.05	379	18,060	.05	903	524	138.2	
Fin., Ins., Re. Est.	2,870	.10	287	7,130	.10	713	426	148.4	
Services	5,850	.05	293	17,060	.05	853	560	191.1	
Government	5,520	.10	552	12,070	.10	1,207	655	118.7	
Other	530	.00	0	1,300	.00	0	0	0	.0
Total	33,190		6,321	79,640		15,163	8,842	139.9	

a) Also see Appendix IV-A for further explanation of employee mix.

b) LIRB means "light industrial/research/business" parks.

APPENDIX III-A
OFFICIAL POLICY BASES FOR THE
PROVISION OF INDUSTRIAL LAND USE

STATE POLICIES SUPPORTING INDUSTRIAL DEVELOPMENT

There are many policies and actions, both executive and legislative, that establish the State's support of industrial development in Florida communities. One such indication is the following excerpt from the Office of the Governor's recent "Policy Guides Workshop Draft -- Abstract," prepared by the State Office of Planning and Budget (emphasis added):

"1.1 Creating an Environment for Economic Growth

During the 80s and into the next decade, American industry will be changing rapidly because of the development of new processes and products. This shifting of the industrial and manufacturing sector will cause a realignment of where and how products are produced. As a result of this realignment, a challenge is presented to the State to develop an environment where new industry can grow.

Policies

- o To develop cooperative community college, university instructional and research programs with private industry.
- o To enhance the engineering continuing educational program.
- o To upgrade equipment and to improve the instructional salaries of computer science and engineering instructional personnel in community colleges and area vocational centers, and to increase the salaries for qualified math and science teachers in the public schools.
- o Enhance the industry services training concept.
- o To establish a state level council with coordination capability to coordinate education, manpower training

and the needs of private industry.

- o To develop a coordinated economic development strategy encompassing the state's financial, labor and transportation and education systems.
- o To establish occupational specialists in the high schools and community colleges.
- o To establish the occupational data base, that will provide timely, accurate information to complement economic development activities.
- o To remove regulatory barriers in the financial markets which prevent the formations of small...high technology companies.
- o To develop a means to assist small high technology companies to finance expansions.
- o To continue the national solicitation programs.
- o To advertise quality educational programs that are of benefit to economic development.
- o To continue to promote the State.

"1.2 Diversifying the Economy and New Company Growth

The 1974-75 recession became a catalyst for increased efforts to diversify Florida economy. The awareness of the economic vulnerability of our major industries to external forces such as increasing inflation and uncertain oil supplies brought the State to the realization that there is a need to broaden Florida's economic base. The issue with which the State must deal is how to continue to diversify the State's economy.

Policies

- o To develop the international trade potential of the State.
- o To continue the solicitation programs with an emphasis on the recruitment of high technology firms.

- o To increase the targeting of corporate headquarters solicitation.

"1.3 Maintaining and Developing Essential Capital Facilities

Private investment alone cannot sustain economic development. A successful and growing economy requires sound public facilities. The transportation network -- roads, bridges, airports, ports and terminals -- is essential for efficiently moving raw materials and finished products. Industry and households need adequate water supply systems. Our environment must be protected by appropriate waste treatment and waste disposal systems. And as technological progress increases the complexity of our economy, new types of public infrastructure are required -- facilities to handle the burgeoning demands for electronic communication, and to safely dispose of toxic wastes. To demonstrate the problem consider the national picture. The cost of rehabilitating non-urban highways throughout the nation will exceed \$700 billion during the 1980s. The nation's cities will have to spend \$100 billion during the next 20 years to maintain their water supplies. Agricultural expansion is jeopardized by inadequate roads, lack of rail services and terminal facilities for handling bulk cargos.

Policies

- o Maintain the level of public investments in the State's capital facilities to ensure continued economic growth.
- o Develop a means to finance water and sewer systems.

"1.4 Securing the State's Energy Future

Business is dependent upon a supply of energy at a cost which will not inflate the price of the finished product. Florida is not a producer of oil, and is therefore, dependent upon the nation's energy policies. Because energy is tied to the State's economic development, the future planning of the State must consider

- o Encourage the development of high-employment, pollution-free manufacturing.
- o Encourage local planning programs to designate areas suitable for...industrial growth and development.

Land Use

Land Use Policies relating to economic development are provided below:

- o Encourage groupings of industrial...uses at points of high transportation accessibility."

LEE COUNTY POLICIES SUPPORTING INDUSTRIAL DEVELOPMENT

Lee County Industrial Development Authority

On March 15, 1978, the Lee County Board of County Commissioners established the Lee County Industrial Development Authority (LCIDA). The resolution establishing the authority stated that there was a need to "foster industrial...development of the County." The Authority is authorized to finance capital projects including industrial plants. The state act authorizing the establishment of the authority states that a purpose is "to increase opportunities for gainful employment and purchasing power, improve living conditions and otherwise contribute to prosperity." In accordance with its mandate the LCIDA actively promotes light industry for the County.

Lee County Overall Economic Development Program

In 1978 the Lee County Board of County Commissioners passed a resolution embodying the objectives of the Lee County Overall Economic Development Program (OEDP) Committee, which reads in part as follows:

- "I. To develop and continuously update an Overall Economic Development Program Plan...

- II. To provide a forum for the continuous discussion of economic development issues in Lee County and the public sector's roles in defining and providing appropriate levels of assistance to the private sector..."

Accordingly, in 1978 the OEDP Committee adopted goals and objectives which read in part as follows (emphasis added):

"Goal I. Encourage the diversification and expansion of Lee County's economy.

C. Industrial...Development

- o Support active program of advertisement and recruitment of new businesses.
- o Support development of sites which will attract desirable industries.
- o Seek manufacturing industries that can use locally available trained or retrained work force.
- o Promote Lee County as corporate administrative and research and development headquarters or regional offices.

F. Public Services

- o Ensure that public services and facilities necessary for the economic development are available when needed.

"Goal II. Seek ways to assist present businesses in their expansion efforts.

C. Industrial...Development

- o Promote year-round enterprises (e.g.,...electronics, etc.)
- o Promote Lee County as a...transportation link with Latin American and other international markets.

"Goal III. Encourage the cooperation of the Private and Public Sectors in providing capital, education and services.

C. Industrial...Development

- o Maintain continuous dialogue between business and education to assure a labor force trained in needed skills.
- o Cooperate in planning and providing for utilities and facilities for new and expanding industries and developments.
- o Seek public and private funds for capital investment and training programs.
- o Provide local tax incentives where possible and support legislative efforts on state and national level.
- o Develop reliable and efficient systems of moving people and freight.

"Goal IV. Provide expanded opportunities for education and training for both entry level jobs and further advancement.

C. Industrial...Development

- o Plan for development and expansion of technology curricula for resident college and university levels to reflect continuing education requirements for local industries.
- o Expand vocational elements of public schools to upgrade resident labor force.
- o Enlist the active support of industry in financing, instructing and developing course materials for both vocational and college level continuing education."

In 1979 the OEDP Committee adopted goals and objectives which read in part as follows (emphasis added):

"A. Development of a Diversified Economy

Objective 1: Create an industrial/commercial climate that attracts new businesses, light industry and corporate or regional headquarters.

Objective 2: Identify potential industrial sites and define appropriate implementation strategies.

- Objective 3: To encourage capital improvements which provide needed public services and facilities.
- Objective 4: Promote the development of port facilities.
- Objective 5: Promote the development of the fishing industry through improved docking, processing and improved distribution facilities.

"B Development of Human Resources

- Objective 1: Promote increased employment opportunities in all sectors of the economy.
- Objective 2: Encourage educational and training programs to keep abreast of technological advances in the various industries."

Then, in 1982, the OEDP Committee adopted goals and objectives reading in part as follows (emphasis added):

"Goal 1: To create a stable foundation for industrial development in Lee County by providing an environment which promotes growth and limits costs. Power generation at the Florida Power and Light site on the Caloosahatchee River, I-75 bisecting the County, and the new Jetport provide an excellent infrastructure for industrial development. A longterm guarantee of water availability and cost stablization are problems industries expect local governments to manage. Investigate the feasibility of a water retention or storage area in Lee County.

"Goal 4: To encourage growth and diversification and to create a stable environment for the industrial and commercial fishing economy in Lee County. Fish ecosystem analysis is covered in Objective 3.

Objective 5: To determine whether a fish processing plant in Lee County would be feasible, and if so, where. To be presented to the Board of County Commissioners for their consideration.

"Goal 5: Currently, commercial growth is reflecting population and industrial growth. To enhance commercial growth beyond providing the local economy with services and goods, a free trade zone and enterprise zone should be considered.

Objective 6: To determine if it is in the economic best interest of Lee County to create a free trade or enterprise zone and identify potential sites. To be presented to the Board of County Commissioners for their consideration."

Lee County Comprehensive Development Plan

In August of 1979 the Lee County Board of County Commissioners adopted a Comprehensive Development Plan for the County pursuant to the State's Local Government Comprehensive Planning Act of 1975, as amended. Policies dealing with industrial land use and related transportation support facilities are on pp. 28-32 in Part 3 of the Plan and read in part as follows (emphasis added):

"32. It shall be the policy of the Board of County Commissioners of Lee County to prepare development regulations that:

a. protect established industrial...developments from the intrusion of non-compatible uses which could adversely impact the ares;

c. encourages (sic):

(1) industrial development in locations having immediate or direct access to one or more of the following:

- o major highways
- o railroads
- o air freight facilities
- o marine transport

(2) industrial development in industrial parks or industrial subdivisions which furnish adequate water (for human

waste as well as industrial effluents), proper drainage, appropriate paved ingress/egress and circulation, and proper separation from other land uses:

35. It shall be the policy of the Board of County Commissioners of Lee County to encourage, support, or promote:

- c. commercial aviation and shipping port facilities designed and located consistent with the needs of Lee County and compatible with surrounding land uses; and,

37. It shall be the policy of the Board of County Commissioners of Lee County to encourage, support, and promote:

- a. high intensity land uses to locate along and near major arterials;
- b. industrial locations which have designated truck routes, intermodal terminals, and minimization of conflicts between people movements and goods movements"

The Comprehensive Development Plan also includes the following industrial site location and development standards on page 80 of Part 3:

Vehicular

Type of Facility Min. Public Utility Access (min. road type) Main Function Min. Site Size Location Criteria

Organized or Planned Industrial District or Park	Sanitary Central Water	Arterial	Grouping of compatible, small industries; employment center	40 acres	Preferably in area of high intensity uses. Direct access to freeway, highway or expressway. Close proximity to rail & air transportation. Conveniently located near work force. Accessible to market &/or resource area.
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Individual Industrial Site	Variable, due to individual activity	Collector/Arterial	Individual Industrial Needs	1 acre	Direct access to arterial roads. Close proximity to rail & air transportation. Adequate land for sufficient buffer. Accessible to market &/or resource areas. Conveniently located near work force.
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APPENDIX IV-A
DERIVATION OF YEAR 2005 INDUSTRIAL
DISTRICT EMPLOYMENT

Lee County's industrial district employment in 2005 is estimated by:

- a. Determining the number of non-farm employees in Lee County for that year, by SIC (Standard Industrial Classification) category.
- b. Determining what percentage of the employees in each SIC category will be located in industrial districts.
- c. For each SIC category, multiplying the total County employment (from step "a" above) by the percentage that will occupy industrial districts (from step "b") to get the number of employees in each SIC category that will occupy industrial districts.
- d. Totaling the industrial district employment for each SIC category, as determined in step "c", to get the total year 2005 Lee County employment in industrial districts.

Using U.S. census data as a benchmark, the National Planning Association (NPA) annually produces detailed projections of future year population, employment, and income for the nation, states, metropolitan areas, and counties by means of its national economic model. Each year the forecasts differ as new trends set in and are reflected statistically. (For example, in 1981 NPA projected a year 2000 Lee County population of 314,700, and in its 1982 forecast this was increased to 320,230.)

The future population to which Lee County is scaling its land use plan is 402,150 permanent residents (that is, excluding tourists and visitors), and it is currently anticipated that this population will be reached by the year 2005. This is based on the medium (as apposed to high or low) series of the latest population projections for Lee County issued by the Bureau of Economic and Business Research (BEER) of the University of Florida in Bulletin No. 60, Projections of Florida Population by County, 1983-2020, July 1982.

In order to develop industrial district acreage needs that are consistent with the rest of the land use plan, and because of the high credibility of the source, the BEBR population forecast figures were used in this analysis.

Because the National Planning Association projects total population, as well as employment by SIC category, for each forecast year, it is possible to compute each SIC employment category as a percentage of total population for any given year. The reasonableness of this is shown by the following table based on NPA employment forecasts, which shows that each SIC category as a percentage of total population tends to follow its own, fairly constant (and fairly level) trend line and does not change significantly as the total population forecast changes:

	<u>1970</u>		<u>1980</u>		<u>1990</u>		<u>2000</u>	
Population	107,400		205,700		270,660		320,230	
Employees ^{a)}	<u>No.</u>	<u>% of Pop.</u>	<u>No.</u>	<u>% of Pop.</u>	<u>No.</u>	<u>% of Pop.</u>	<u>No.</u>	<u>% of Pop.</u>
Mining	110	0.10%	250	0.12%	360	0.13%	420	0.13%
Constr.	4,300	4.00	8,600	4.18	11,970	4.42	14,040	4.38
Mfg.	1,740	1.62	3,590	1.75	5,280	1.95	6,530	2.04
TCPU	2,020	1.88	3,880	1.89	5,190	1.92	5,800	1.81
Whol.	1,110	1.03	3,470	1.69	5,810	2.15	7,610	2.38
Retail	7,570	7.05	16,520	8.03	22,760	8.41	27,720	8.66
FIRE	2,870	2.67	6,250	3.04	9,420	3.48	12,110	3.78
Servs.	5,850	5.45	14,540	7.07	23,740	8.77	33,800	10.55
Gov't.	5,520	5.14	11,490	5.59	15,760	5.82	19,250	6.01
Other	<u>530</u>	<u>0.49</u>	<u>1,200</u>	<u>0.58</u>	<u>1,510</u>	<u>0.56</u>	<u>1,650</u>	<u>0.52</u>
Total Non-Farm Empl.	31,610	29.4%	69,790	33.9%	101,790	37.6%	128,930	40.3%

^{a)} Abbreviations for SIC categories are as follows:

Constr. (Construction); Mfg. (Manufacturing); TCPU (Transportation, Communications and Public Utilities); Whol. (Wholesale); FIRE (Finance, Insurance and Real Estate); Servs. (Services); and Gov't. (Government).

Hence, it is reasonable to assume that the NPA percentage distribution of SIC categories for its year 2000 population estimate is a close approximation of what the NPA model would show if it used the BEBR year 2005 population forecast.

The single exception is manufacturing employment. As discussed elsewhere in this report, an economic development goal for Lee County would be to intervene into what would otherwise be the "normal" manufacturing trend and implement policies that will increase manufacturing activities in the County. Note that NPA shows the County's manufacturing employment increasing from 1.75% of the population in 1980 to only 2.04% by the year 2000 (or 2005). One possibility, of course, is that Lee County will do nothing to change this. Three additional possibilities (discussed elsewhere) are that Lee County will successfully implement policies to increase this figure to either 3%, 5%, or 7.5% between now and 2005. Consequently, the balance of this analysis carries forth all four of these possibilities in order to illustrate what each would mean in terms of industrial district needs.

It should also be pointed out that any such successful industrial development program would be aimed at producing additional jobs that would stem the out-migration of Lee's working-age population in future years. That is, these jobs would be created in addition to, and not at the expense of, jobs in the other SIC categories. It can therefore be assumed that employment in these other SIC categories would not diminish in number.

The next step is to determine what share of the employees in each SIC category will be located in industrial districts in the year 2005. It is common today for industrial land uses to accommodate sizeable percentages of wholesale and construction employment (depending on how "industrial" is defined as a land use), as well as most manufacturing and TCPU employment. Moreover, it is important to realize that the old concept of "industrial districts" -- particularly in sunbelt areas such as Lee County -- has been involving into "light industrial and research parks" which combine light industrial and research activities, and there is a strong future trend toward the concept of "business parks" which will increasingly combine industrial, office, and other uses in various mixtures.

An example of such a land use mixture is found in the new Arvida Park of Commerce, located in Boca Raton's Light Industrial and Research Park (LIRP) zoning district. Included here are: Sensoramic Electronics Corporation's office headquarters (with manufacturing located in nearby Deerfield Beach); Megasystems, Inc.'s monitor/control systems manufacturing facility (partly relocated from Ohio); Mitel Inc.'s telecommunications training, research, development and manufacturing activities; Zimmer Corporation's mobile home corporate headquarters; "APOC V", a for-lease multi-occupant building for high-tech development, research, manufacturing, marketing/sales, etc; Datamedix Inc.'s medical monitoring systems research and development; Siemens Communications Systems, Inc. Telephone Division's research, development and corporate marketing; South East Connectors Inc.'s corporate offices, manufacturing, warehousing, and distribution; ALRO Metals Service Center Inc.'s manufacturing and distribution of metal products; Alumiglass Inc.'s corporate headquarters and manufacturing plant; and CRC Press's office and warehouse.

It is therefore reasonable to assume that industrial districts as shown on the land use plan map, will contain a somewhat broader mix of employee types than they do today.

For purposes of this study it is estimated that in the year 2005 Lee County's industrial districts will contain the following percentages of countywide non-farm employees by SIC category.

	<u>Percent</u>
Mining	10
Construction	20
Manufacturing	90
Transport., Commun., & Pub. Utils.	90
Wholesale trade	50
Retail trade	5
Finance, insurance & real estate	10
Services	5
Government	10
Other	0

For each SIC category, the following table takes the projected share of total population (Column I) and multiplies it by the projected year 2005 total population to yield the total number of employees in the County (Column II). It then multiplies Column II by the estimated share of employees that will locate within industrial districts (Column III) to yield the estimated number of employees within industrial districts.

COMPUTATION OF THE NUMBER OF
EMPLOYEES IN LEE COUNTY INDUSTRIAL DISTRICTS
IN THE YEAR 2005

	(I)	(II)	(III)	(IV)
	Year 2005	x 402,500	x Share of Empl.	
	Share of Pop.	(Yr. 2005 Pop.)	in Indust.	= No. Empl. in
		= No. Empl. in Co.	Dists. in Yr. 2005	Indust. Dists.
Mining	.0013	523	.10	52
Constr.	.0438	17,614	.20	3,523
Mfg. (Assumpt. 1)	(.0204)	(8,204)	(.90)	(7,384)
Mfg. (Assumpt. 2)	(.0300)	(12,065)	(.90)	(10,858)
Mfg. (Assumpt. 3)	(.0500)	(20,107)	(.90)	(18,096)
Mfg. (Assumpt. 4)	(.0750)	(30,161)	(.90)	(27,145)
TCPU	.0181	7,279	.90	6,551
Whol.	.0238	9,571	.50	4,786
Retail	.0866	34,826	.05	1,741
FIRE	.0378	15,201	.10	1,520
Servs.	.1055	42,427	.05	2,121
Gov't.	.0601	24,169	.10	2,417
Other	.0052	2,091	.00	0
Total (under Assumption 1: Unadjusted increase in Mfg. Empl.)				(30,095)
Total (under Assumption 2: Mfg. Empl. Incr. to 3% of Pop.)				(35,569)
Total (under Assumption 3: Mfg. Empl. Incr. to 5% of Pop.)				(40,807)
Total (under Assumption 4: Mfg. Empl. Incr. to 7.5% of Pop.)				(49,856)

Hence, if Lee County does not increase its manufacturing employment beyond current trends (2.04% of the population by year 2005), it can expect to have about 30,000 employees in industrial districts^{a)} in that year. If through successful policy intervention it increases this to 3% it can expect about 35,600 industrial district employees. An increase to 5% would result in 40,800 such employees. And an increase to 7.5% (the same as Broward County's Year 2020 goal) would result in about 49,900 such employees.

^{a)} As implied by the foregoing discussion, this is a broad definition of "industrial districts", containing nearly all manufacturing and transportation/utilities type employees, about one half of the whole-sale/warehousing type employees, about one fifth of construction employees, and a small scattering of retail, service, and office employees.

APPENDIX IV-B
DERIVATION OF YEAR 2005 INDUSTRIAL
DISTRICT DENSITIES

Employee Mix within Industrial Districts

In planning for industrial land needs it is important to keep in mind that there are many activities other than manufacturing that typically and appropriately occur in conventional industrial zoning districts, even under non-pyramid^{a)} zoning. This is illustrated in the following list, which identifies those activities often found in industrial zoning districts. Hence, in addition to a large number of processing (i.e., manufacturing) activities per se, significant amounts of extraction; transportation, communications, and utilities; distribution; and service activities are also present.

ACTIVITIES MOST TYPICALLY ASSOCIATED
WITH INDUSTRIAL LAND USE

1. Extraction Activities (including stockpiling and assembly of material incidental to these activities)
 - 13 Fisheries
 - 14 Mining, including on-site ore preparation
 - 19 Other not elsewhere classified
- 2-3. Processing Activities (including refining, fabricating, assembly, storage, parking, and other space uses incidental to these activities)
 - 20 Food and kindred products
 - 21 Tobacco products
 - 22 Textile mill products
 - 23 Apparel and other finished products made from fabrics and similar materials
 - 24 Lumber and wood products, except furniture

a) Non-pyramid zoning refers to zoning ordinances that restrict each district to uses of a certain type (e.g., "industrial") and do not permit uses to be "carried over" from "less intensive" districts (such as permitting residential or commercial activities in an industrial district).

- 25 Furniture and fixtures
 - 26 Paper and allied products
 - 27 Printing, publishing, and allied industries
 - 28 Chemicals and allied products
 - 29 Petroleum refining and related industries
 - 30 Rubber and miscellaneous plastics products
 - 31 Leather and leather products
 - 32 Stone, clay, and glass products
 - 33 Primary metals industries
 - 34 Fabricated metal products, except ordnance machinery, and transportation equipment
 - 35 Machinery, except electrical
 - 36 Electrical machinery, equipment, and supplies
 - 37 Transportation equipment
 - 38 Professional, scientific, and controlling instruments; photographic and optical goods; watches and clocks
 - 39 Miscellaneous manufacturing industries, including ordnance, construction, and related activities
4. Transportation, Communications, and Utilities Activities (including related rights-of-way, storage, service, parking, and other areas incidental to these activities)
- 40 Railroad transportation and related transfer and maintenance facilities.
 - 41 Local passenger systems and related maintenance, including terminals for cross-country stage lines but not including commuter lines operated over railroad rights-of-way and not including highway rights-of-way
 - 42 Motor freight transportation and related transfer and maintenance facilities
 - 43 Highways and related maintenance facilities
 - 44 Water transportation and related transfer and maintenance facilities
 - 45 Air transportation and related terminal transfer and maintenance facilities including landing areas and incidental space reservation (excluding military)
 - 46 Pipeline transportation and related transfer, tank farm, and maintenance facilities
 - 48 Other communications and related transfer and maintenance facilities including telephone, telegraph, radio, television, and post office
 - 49 Electric, gas, water, and waste disposal services, including processing and storage, rights-of-way, and related facilities
5. Wholesale trade--with storage on premises (includes merchant wholesalers, wholesale and industrial distributors, manufacturers' sales branches and wholesale assemblers, and other warehousing functions involving storage on premises, except stockpiling under Activity Systems 1,2,3,4 above)
- 52 Retail trade--building materials, hardware, and farm equipment
 - 55 Retail trade--automotive dealers, auto accessories, and gasoline service stations

6. Service Activities (including customer or employee parking, loading, service, and other related areas)
 - 64 Automobile repair and services, metered or fee parking lots and garages
 - 63 Miscellaneous repair services

Ranges of Densities

Industrial district densities vary enormously from time to time, from place to place, and with the nature of the industrial activity. One indication of this can be found in the following table that was developed by the Philadelphia City Planning Commission back in 1960 showing illustrative acreage standards that were used to determine industrial space requirements in various geographic rings of the city:

Class of Industry	Workers per Acre		
	Inner Zone	Outer Zone	Far Northeast
Food	109	37	11
Tobacco	261	105	—
Textiles	131	52	26
Apparel	373	116	—
Lumber and furniture	93	37	19
Paper	131	52	26
Printing	163	65	33
Chemicals	109	44	22
Petroleum and coal	—	10	5
Rubber	187	75	37
Leather	174	70	—
Stone, clay and glass	109	44	22
Primary metals	—	22	11
Fabricated metals	163	44	20
Nonelectrical machinery	145	58	29
Electrical machinery	297	87	37
Transportation equipment	—	65	33
Precision instruments	187	52	22
Miscellaneous	163	65	33

The range at that time was from 373 workers per acre for apparel manufacture in the inner zone down to 5 workers per acre for petroleum and coal in the far northeast. Even in the far northeast alone, which was more typical of the lower industrial densities prevailing in the outlying areas of older, northern cities 23 years ago, the density ranged from 37 for electrical machinery manufacture all the way down to 5 (again, petroleum and coal).

The table below offers another example: Charlotte, NC in 1970. The average industrial density for all industries ranged from 2.6 in the intermediate ring to 51.9 in the CBD (Central Business District). A figure somewhat more comparable to Lee County's situation, however, was the 8.9 employees per net acre for the outer (newer) areas, which was expected to rise to 10 employees per net acre by 1995.

INDUSTRIAL DENSITIES IN MECKLENBURG COUNTY (CHARLOTTE), N.C.

	1970	1995
	<u>Empl./Net Ac.</u> ^{a)}	<u>Empl./Net Ac.</u> ^{b)}
CBD	51.9	44
Inner ring	11.1	15
Intermediate ring	2.6	10
Outer areas	<u>8.9</u>	<u>10</u>
Total Co.	7.3	11.8

a) Industrial includes manufacturing, TCPU, and part of wholesale.

b) These would have to be reduced by approximately 20% to get employees/gross acre.

Other examples of industrial density standards that have been used in planning in the past are Roanoke (19 employees/acre), Cincinnati (30), Copenhagen (20), and British New Towns (30).

One thing that is clear is that the development of crowded industrial districts typical of older cities is a thing of the past, particularly in Florida and other newly developing industrial regions, because of the low-rise, spread-out nature of new industrial

activities and buildings, the need for parking and other ancillary areas, and the growing importance of open space, landscaping, lakes, recreation facilities, and other amenities.

Net vs. Gross Density

Where possible, it is useful to distinguish between net and gross industrial density. Net density is the number of industrial employees divided by the net site area used for industrial occupancy, exclusive of utility and other rights-of-way and other portions of the total area not directly or exclusively usable by the industrial establishment. Gross density is the number of industrial employees divided by the total related area, including streets, rights-of-way, etc. The ratio of gross density to net density will vary with the type and size of development. For example, the Urban Land Institute (1976) offers the following table for illustrative purposes:

<u>Density Class</u>	<u>Workers per Acre</u>	
	<u>Net</u>	<u>Gross</u>
Intensive	30	26
Intermediate	14	12
Extensive	8	6

Note that in this table the net density is reduced by 13, 14 and 25% respectively to calculate the corresponding gross density. These values will, of course, vary from one part of an urban area to another, but for Lee County an areawide average reduction of 20% is reasonable for converting from net density to gross density. For purposes of land use plan allocations, the gross density should be used because it is the gross area that is being allocated.

Recent Sunbelt Data

To offer data that are both more recent and more comparable to Lee County, the following table lists present and anticipated

future densities for 18 sunbelt areas that were compiled by the author in a 1979 study. The areas are listed in order of ascending density. (These are areawide averages, and for any one of them the figures would vary considerably from one part of the area to another and from one industrial activity to another.) Note that the median value is 10.5 and that this would equate to a gross density of about 8.4. Perhaps more significantly, the three Florida areas included in the table exhibit a mean net density of 8.5 (comparable to a gross density of 6.8).

ESTIMATED NUMBER OF
INDUSTRIAL EMPLOYEES PER ACRE
OF INDUSTRIAL LAND USE

	<u>Employees Net Acre</u>
Phoenix (Urban Planning Area), AZ	4.0
Tampa (Hillsborough County), FL	4.8
Anaheim (Orange County), CA	5.3
Denver (County), CO	6.5
Charlotte (Mecklenburg County), NC	7.3
Portland (Transp. Study Area), OR	9.0
Orlando (Orange County), FL	9.5
San Mateo County (near San Francisco), CA	10.4
San Francisco Bay Area (9 Counties), CA	10.4
DeKalb County (near Atlanta), GA	10.7
Broward County, FL	11.2
Tacoma (Pierce County) WA	12.3
St. Petersburg (Pinellas County), FL	12.6
Santa Clara County (near San Francisco), CA	13.3
Atlanta Region (7 counties), GA	14.0
Snohomish County (near Seattle), WA	15.2
San Diego (County), CA	17.0
Seattle (King County), WA	29.3

Since industrial areas include wholesale and related activities as well as manufacturing activities, it is appropriate to look at

them as well. (These are older figures, and are probably somewhat higher than what would prevail today.) For Nashville-Davidson County in 1955, the net density for wholesale proper was 32, for trucking/warehousing it was 10, and for petroleum bulk stations it was 3. Baltimore's 1959 net densities for wholesale and related were 25 (central area) and 10 (4-county area). In smaller urban areas (e.g., Roanoke) a net density of 10 has been used as a typical areawide standard. (This is comparable to a gross density of 8.)

Prevailing Densities in Lee County

The matter of industrial employee densities is probably best summarized in Chapin and Kaiser's Urban Land Use Planning (1979): "...It should be emphasized that these densities vary from area to area, depending on the particular industrial mix, and from time period to time period as technology forces changes in distribution and manufacturing processes; therefore, density standards must be estimated locally."

There are two recent measures of prevailing industrial densities in Lee County. First, in 1980 the Southwest Florida Regional Planning Council (SWFRPC) reported a total Lee County industrial acreage of 886 acres. Its definition of industrial land use in this study was fairly conservative: "Industrial land uses include fabricating and manufacturing plants. Typical examples in the Region include lumber yards and concrete and cement plants." That is, wholesale, services and other potentially "industrial" land uses (e.g., for zoning purposes) were classified as commercial, not industrial. This is a valid demarcation as long as comparable employee definitions are used. Therefore, the employee occupancy of these areas was estimated as follows:

	1980 Empl. (NPA)	X Est. Share in Indust. Dists.	= No. of Ind.st. Dist. Empl.
Constr.	8,600	.20	1,720
Mfg.	3,590	.90	3,231
TCPU	3,880	.70	<u>2,716</u>
Total			7,667

Dividing 7,667 employees by 886 acres yields an estimated net industrial density of 8.65 employees per acre.

Then in 1981, the Lee County Division of Community Development conducted a land use survey that showed a total of 1,138 acres of industrial land use in the unincorporated areas of the County. [Industrial land use inventories for Fort Myers in 1982 (178 acres) and Cape Coral in 1978 (64 acres) were added to this for a total approximate County-wide total of 1,380 acres.] The definition of "industrial" land use was somewhat broader here than in the SWFRPC survey and included a range of light and heavy industries and similar uses. Therefore, the employee occupancy of these areas was estimated as follows:

	1981 Empl. (NPA)	X Est. Share in Indust. Dists.	= No. of Indust. Dist. Empl.
Constr.	8,690	.20	1,738
Mfg.	3,700	.90	3,330
TCPU	3,980	.90	3,582
Whol.	3,680	.50	1,840
Retail.	17,070	.02	341
FIRE	6,490	.02	130
Services	15,440	.02	309
Gov't.	11,700	.02	234
Total			11,504

Dividing 11,504 employees by 1,380 acres yields an estimated net industrial density of 8.34 employees per acre.

The two estimates of current Lee County industrial district density derived above -- namely 8.65 and 8.34 -- are very similar, and their mean value is 8.50, which is very close to comparable figures for other areas discussed above. Because of the probability of a continuing trend toward slightly increased shares of office and even some retail activity in these districts (which is consistent with the assumptions made in Appendix IV-A), this overall industrial district density should be increased to 9.0 to reflect the higher densities of these uses. Reducing this value by 20% to convert from net density to gross density yields

a probable average gross industrial district density for Lee County of approximately 7 employees/acre.

Of course, this average really represents a range, so that most industrial areas in the County can be expected to fall somewhere between 5 and 10 employees per gross acre (which is about 6 to 13 employees per net acre).

APPENDIX IV-C
DERIVATION OF TOTAL INDUSTRIAL ACREAGE
TO BE INCLUDED IN THE LAND USE PLAN MAP

The table at the end of this appendix shows the results of the sequence of calculations performed to arrive at the total amount of industrial acreage that should be included in the Land Use Plan Map. Column I is simply a list of the four postulated alternative assumptions as to what percentage manufacturing employment will be of total population in the year 2005. Column II is taken from the totals derived in the table at the end of Appendix IV-A. Column III is equal to Column II divided by 7 employees per gross acre (derived in Appendix IV-B).

Safety and Flexibility Factors

Column IV is equal to Column III increased by a safety factor to allow for the risk of underestimating needs. The importance of such a safety factor is stressed in Chapin and Kaiser's Urban Land Use Planning (1979) on page 157:

"In most applications of forecast data in land use planning -- for example, in estimating industrial land requirements -- there is some latitude for inaccuracy. The use of industrial employee density standards in conjunction with a forecast of manufacturing employment yields a tentative estimate of the new acreage required to accommodate normal industrial expansion. But then, in the same way that civil engineers introduce safety factors which make the designed capacity of a bridge considerably in excess of maximum loads anticipated, the city planner usually provides for an "industrial reserve" or a safety factor in his estimates of space requirements so that an increment well over the amount of land estimated to be needed for normal growth and expansion is included."

And again, on pp. 414 - 15:

"Even with the introduction of a safety factor, the resulting estimate of space requirements is generally regarded ... as insufficient to cover the contingency of very large installations desiring to locate in the area. To cover such an eventuality and at the same time to give some recognition to the importance of protecting prime industrial sites in anticipation of needs even beyond the twenty to twenty-five-year planning period, a planning agency will frequently earmark additional areas as 'industrial reserves.' There is no standard practice in estimating space requirements in this category: it is largely a subjective matter, tempered somewhat by the relative scarcity of land in fringe and dispersed locations that is appropriate for industrial use."

Part of the need for such a safety factor results from the risk that the assumed average employee density will prove to be too high (and that more acres will therefore be needed by 2005) and other uncertainties inherent in analyses of this type.

Another risk is that population (or industrial development as a function of population) will grow faster than anticipated during the planning period. However, this risk decreases as the assumed future level of manufacturing employment increases. That is, Lee County's manufacturing employment is less likely to exceed 7.5% than it is to exceed 2.04%. Therefore, instead of using a constant safety factor it was decided to use a sliding scale of 35%, 30%, 25%, and 20% respectively for the four manufacturing employment assumptions.

Column V is equal to Column IV increased by a flexibility factor. Whereas the safety factor discussed above deals with need and the risk of underestimating it, the flexibility factor deals with the separate matter of site availability. As explained by Chapin and Kaiser (p. 408),

"... It should be noted that such a flexibility factor is over and above the safety factors introduced in the course of

detailed calculations made in the analyses of space requirements as discussed in the various sections of this chapter below. Such a flexibility factor allows for unanticipated choices of individuals and firms who may acquire land in excess of the estimated need, and it allows for land which may be held out of use because of personal preferences or whims of a few property owners or because of legal complications which make the land unavailable for immediate development."

In addition, land may be held back for purposes of speculation. Chapin and Kaiser suggest 25% as an adequate allowance for flexibility, and that is the figure used here.

I	(II)	(III)	(IV)	(V)
Assumed Mfg.	Corres-	<u>Gross Industrial Acreage</u>		
Empl. as a %	ponding	Est. Devel.	With Safety	And with
<u>of Total Pop.</u>	<u>Ind. Dist.</u>	<u>Acreage</u>	<u>Factor</u>	<u>Flex. Factor</u>
	<u>Empl.</u>			
2.04	30,095	4,299	5,804	7,255
3.00	35,569	5,081	6,605	8,257
5.00	40,807	5,830	7,288	9,709
7.50	49,856	7,122	8,546	10,683

Col. II is from Appendix IV-A.

Col. III is Col. II divided by .7 Empl./Gross Ac.

Col. IV is Col. III increased by 35% in line 1, 30% in line 2, 25% in line 3 and 20% in line 4.

Col. V is Col. IV increased by 25%.

APPENDIX IV-D
INDUSTRIAL LAND USE AS A PERCENTAGE
OF ALL DEVELOPED LAND

The American Planning Association recently conducted a survey of 66 American cities of various sizes, types and locations to determine what the prevailing percentage distribution of land use was among various categories -- i.e., residential, commercial, industrial, and public (including institutional, parks and recreation and transportation). Such surveys are typically handicapped by differences in definitions, accuracy, and comparability of data. Moreover, this survey presents actual conditions as distinguished from ideal or optimum conditions, and it presents current circumstances, not future or projected estimates.

In addition, the ranges are very large, reflecting the great differences in the nature of land use patterns from one urban area to another. However, when grouped into various categories for purposes of analysis, the figures present prevailing ranges of industrial land use as a percent of total land use in different types of urban places, and as such they provide a useful comparison with the planned amount of industrial acreage proposed for any given urban area.

The survey covered cities only, and comparable data are not available for entire counties. However, the survey applied to developed land only (that is, excluding agricultural and vacant land), and the figures are therefore comparable to those for the developed -- or urbanized -- portion of Lee County, present or future (at least for purposes of getting a "feel" for how the figures vary from place to place and not in order to arrive at some fixed standard). Moreover, the figures indicate that cities with large amounts of "suburban" lands which might otherwise be located outside the city limits (e.g., Houston) do not typically exhibit a lower percentage of industrial land use than other cities, indicating that the developed portions of urban counties are similar to incorporated city areas in this respect.

INDUSTRIAL LAND USE AS A PERCENTAGE OF ALL
DEVELOPED LAND IN VARIOUS TYPES OF CITIES

	<u>Mean</u>	<u>Median</u>	<u>Range</u>
Large cities (Pop. 280,000+)	12.0	11.5	3 - 32
Cities over 1 million Pop.	10.8	11.0	6 - 15
Cities ½ to 1 million Pop.	11.0	9.0	3 - 25
Cities under ½ million Pop.	13.3	13.0	3 - 32
Small cities (300 - 41,400 Pop.)	13.0	12.5	3 - 21
Sunbelt cities	11.0	8.5	3 - 32
Snowbelt cities	13.1	13.0	3 - 25
Resort/retirement cities	6.1	6.5	4 - 10
Coastal cities	11.3	10.0	4 - 25

SOURCE: Author's analysis of APA Survey Results (PAS Memo, May 1983).

The above table shows industrial land use as a percentage of all developed land for various types of U.S. urban areas.

Population size does not appear to be a significant factor, with the mean, median and range values exhibiting a remarkable similarity for very large cities down to very small ones.

Sunbelt cities exhibit slightly lower mean and median values than do snowbelt cities, but the ranges overlap for the most part, with sunbelt values going 38% higher than snowbelt values.

Cities containing major resort and retirement components have somewhat lower percentages of industrial land, as would be expected, since a relatively larger share of their economic base is tourist and retirement related rather than industrial, and a smaller percentage of their population is employed.

Coastal cities show no great difference from the other categories in mean, median or range of values.

It is also interesting to compare Lee County's percentage of industrial land with those for other areas in the above survey. According to the Southwest Florida Regional Planning Council's 1980 report, "Commercial and Industrial Strategies," Lee County (presumably including the three cities therein) had 886 acres of industrial land out of a total of 153,976 acres of "urban" land, for an industrial

land percentage of 0.6%. However, this survey appears to have used a relatively conservative definition of "industrial" land (as discussed in Appendix IV-B). Also, a comparison with comparable figures in the Lee County Division of Community Development's 1981 land use survey (even taking into consideration the fact that the latter excludes cities) suggests that SWFRPC's "urban" land figure of 153,976 acres is substantially larger than what might normally be considered as "developed" land.

A better comparison for this purpose can be derived from the County's own 1981 land use survey (again, keeping in mind that it only covers unincorporated lands). If "industrial" lands are defined as consisting of all light industry (which, in this survey, includes wholesaling and distribution), heavy industry, mineral extraction, and one third of transportation-utilities-communication, then in 1981 6.0% of Lee County's developed land was in industrial use. If in addition, campgrounds and similar uses are excluded from the total (as not being "developed" in one sense of the word), the industrial percentage rises to 6.4% of all developed land. This puts Lee County in the low-middle for resort/retirement cities in APA's survey.

APPENDIX V-A
PLANNING PRINCIPLES FOR LOCATING
MANUFACTURING, WHOLESALE, AND RELATED USE AREAS^{a)}

Manufacturing Areas

1. Reasonably level land, preferably with not more than 5 percent slope^{b)} capable of being graded without undue expense, and outside floodplains.
2. Range of choice in close-in, fringe, and dispersed locations: in extensive manufacturing, large open sites for modern one-story buildings and accessory storage, loading, and parking areas in fringe and dispersed locations, usually five acres as a minimum, with some sites ten, twenty-five, fifty, or one hundred or more acres depending on the size of the urban area and the economic outlook for extensive manufacturing; in intensive manufacturing, variety of site sizes for modern one-story or multiple-story buildings and accessory storage, loading, and parking areas in close-in and fringe locations, usually under five acres.
3. Direct access to commercial transportation facilities: in fringe and dispersed locations, access to railroad, major trucking routes, cargo airports and, in some urban areas, deep-water channels; and in close-in locations, for a major proportion of sites, access to both railroad and trucking routes, with the balance adjoining trucking thoroughfares or, if appropriate, port areas.
4. Within easy commuting time of residential areas of labor force and accessible to transit and major thoroughfares directly connected with housing areas.
5. Availability of utilities at or near the site.
6. Compatibility with surrounding uses, considering prevailing winds, possibilities of protective greenbelts of open space, development of "industrial parks," and other amenity factors both within the manufacturing area and in relation to adjoining land uses.
7. Compatibility of locations with air quality management criteria, especially in "nonattainment areas" of the Air Quality Control Region in which the area falls.
8. For industrial activities involving water-borne wastes, locations where adequate on-site pretreatment of wastes is possible.

a) Chapin and Kaiser

b) Not a problem in Lee County!

Wholesale and Related Use Areas

1. Reasonably level land, preferably with not more than 5 percent slope,^{a)} capable of being graded without undue expense, and outside floodplains.
2. Range of choice in close-in and fringe locations, site sizes usually under five acres.
3. Direct access to trucking routes and major street system for incoming goods and outgoing deliveries; frontage on a commercial street or in well-served wholesale centers; railroad access for minor proportion of sites or centers.
4. Suitability for development of integrated centers, with consideration for amenity within the development and in adjoining areas.

a) Not a problem in Lee County!

APPENDIX V-B
LOCATIONAL PRINCIPLES AND CRITERIA
FOR INDUSTRIAL LAND DEVELOPMENT^{a)}

1. Land must be physically suitable for industry. First-quality sites are level, well drained, and accessible. Cast-off land, not considered useful for any other purpose, will not qualify as satisfactory (or marketable) plant sites. Therefore, swampy, hilly, remote, or inaccessible land does not constitute a usable industrial land reserve.

The gradient usually should not be over 5 percent.^{b)} Occasionally sites with steeper grades, if well located with respect to freeways or railroads and to centers of population, can be economically graded for industrial use.

Exceptions are (a) land near deep-draft channels, which is becoming so scarce that drainage and load-bearing problems may not be considered a serious deficiency, and (b) land for laboratories and headquarters office buildings, where limited gradient concessions may be made to obtain attractive large suburban sites (partly level and partly rolling terrain, but possessing such special attractions as trees, streams, and other interesting natural features).

2. Utilities and services should be available or feasible. Large industrial establishments often drill wells for their water supply, construct their own water and sewage treatment facilities, and are such large consumers of power that utility lines can be extended profitably to remote sites. Small industrial plants, however, are not self-sufficient and must rely upon the community for services.
3. Railroad sites continue to be vital to many industries. Prime railroad-served sites are those fronted by a major highway and backed by the railroad. Sites along the railroad should be not less than 1,000 feet in depth and preferably 2,000 feet or more. Shallow tracts under 500 feet in depth restrict expansion and cannot be used efficiently by most types of industries requiring rail service; exceptions are central-city sites.
4. Prominent sites on freeways are sought by more and more industries. Many light industries and laboratories do not require rail service at the plant site, which allows greater flexibility in their site selection. Industries seek the advertising advantage of a prominent site for their attractive new plants, as well as the economy of an uncongested route for employees driving to and from work and the availability of the freeway for truck service.

a) Industrial Land Development. Baltimore Regional Planning Council, Dorothy Muncy. 1959.

b) Not a problem in Lee County!

Highway sites can vary in depth from a minimum of approximately 600 to 800 feet up to 2,000 feet or more. It must be remembered that for sites fronting on freeways, space for frontage or service roads must be provided.

5. Land adjacent to or near airports should be reserved for special airport-oriented industries. Industries which require flight test facilities or are dependent upon air freight for a substantial portion of their receipts and shipments should have an opportunity to locate near an airport. Also, some industrial firms now seek proximity to an airport terminal because of the extensive air travel required in operating a headquarters office, laboratory, or national service center.
6. Environs of industrial sites must be attractive, not blighted. Responsible industries, like most individual families planning to build a new home, want to locate in an area that is and will remain attractive. Industry does not want to build next to blighted areas, whether residential or industrial.
7. Size of industrial tracts should vary. The region, in selecting land for an industrial reserve, should provide for three types of industrial sites: (a) individual plant sites, ranging from two and a half to ten acres or more; (b) planned industrial district sites with a minimum size of approximately ten acres; (c) special sites for industries requiring large land areas, ranging from 200 to 1,000 or more acres.
8. "Nuisance" industries need efficient locations. Every metropolitan region requires industries often regarded as "nuisances." Junkyards, areas for open storage of construction materials, and fuel storage areas are usually objected to, first, as a hazard to health and property and, second, because of their appearance.

APPENDIX V-C
INDUSTRIAL PARK CRITERIA AND STANDARDS
OF THE NATIONAL ASSOCIATION OF INDUSTRIAL PARKS^{a)}

Criteria

An industrial park is the assembly of land, under one continuing control, to provide facilities for business and industry consistent with a master plan and restrictions, resulting in the creation of a physical environment achieving the following objectives:

consistency with community goals,
efficient business and industrial operations,
human scale and values,
compatibility with natural environments,
achieving and sustaining highest land values.

Standards

Physical

Paved streets
Adequate utility systems for
multiple industrial users
Setback or percentage
coverage requirements
Landscaping
Off-street parking
Architectural control .
through approval of:
appearance
siting
building materials
signs

Operational

One management
Master plan
Design review process
Enforcement process
Community relations
Restrictions
Legal representation
Effective supervision
of environmental
conditions

a) Industrial Development Handbook, Urban Land Institute, 1975;
and Commercial and Industrial Strategies, Southwest Florida
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**RESPONSE TO THE ORC
AIRPORT COMMERCE LAND USE CATEGORY**

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October 21, 1994

EXHIBIT A

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BACKGROUND

Airport Commerce Land Use Category

Policy 1.2.2 of the Lee Plan sets forth the parameters of the Airport Commerce land use category requested for the subject property:

The Airport Commerce areas are commercial and industrial lands adjacent to the airport needed to accommodate projected growth through the year 2010. These areas may include mixed-use developments consisting of light manufacturing or assembly, warehousing and distribution facilities; offices; ground transportation and airport-related terminals or transfer facilities; hotels/motels, meeting facilities; and other hospitality services; and ancillary commercial uses. Because this area is located within the Six Mile Cypress Basin and is also a primary point of entry into Lee County, special environmental and design review guidelines will be applied to its development to maintain the appearance of this area as a primary point of entry into Lee County.

Property Location

As described in the ORC (See Appendix A), the subject property is located north of Alico Road, south of the airport, and east of I-75. More specifically, it is located immediately east of other properties currently designated as Airport Commerce, immediately south of the area currently slated for acquisition by the airport. See Exhibits A and B.

Prior Review

The subject property has been reviewed as a part of the Alico AMDA. The submitted material was found to be sufficient by Lee County and the Southwest Florida Regional Planning Council. With the designation of a part of the Alico AMDA property as the site for the Florida Gulf Coast University, the AMDA was put on hold. The subject property has also been studied by the Lee County Port Authority as a part of their on-going Airport Master Plan Update program.

AIRPORT ACQUISITION

Airport Master Plan Update

In 1989, 4,600 acres were proposed for acquisition by or for the airport. In 1990, the Lee County Port Authority commissioned a study of the short and long term needs of the Southwest Florida Regional (now International) Airport and that acreage figure was increased to a total of 6,300 acres. One of the "Short Term Needs" identified in that study was the "Preparation of a site for future airport support activities". Exhibit C1 (Exhibit I.1 of that study) depicts an aggressive position in designating the subject property as "Revenue Support". Included in the acreage were uses associated with the airport but not technically a part of it. The county wanted to control the land uses adjacent to the expanding airport to ensure that related land uses required by the airport were provided nearby and that all land uses in the area were compatible with the airport. The proposed expansion of the Airport Commerce land use category clearly provides the support envisioned. The 1990

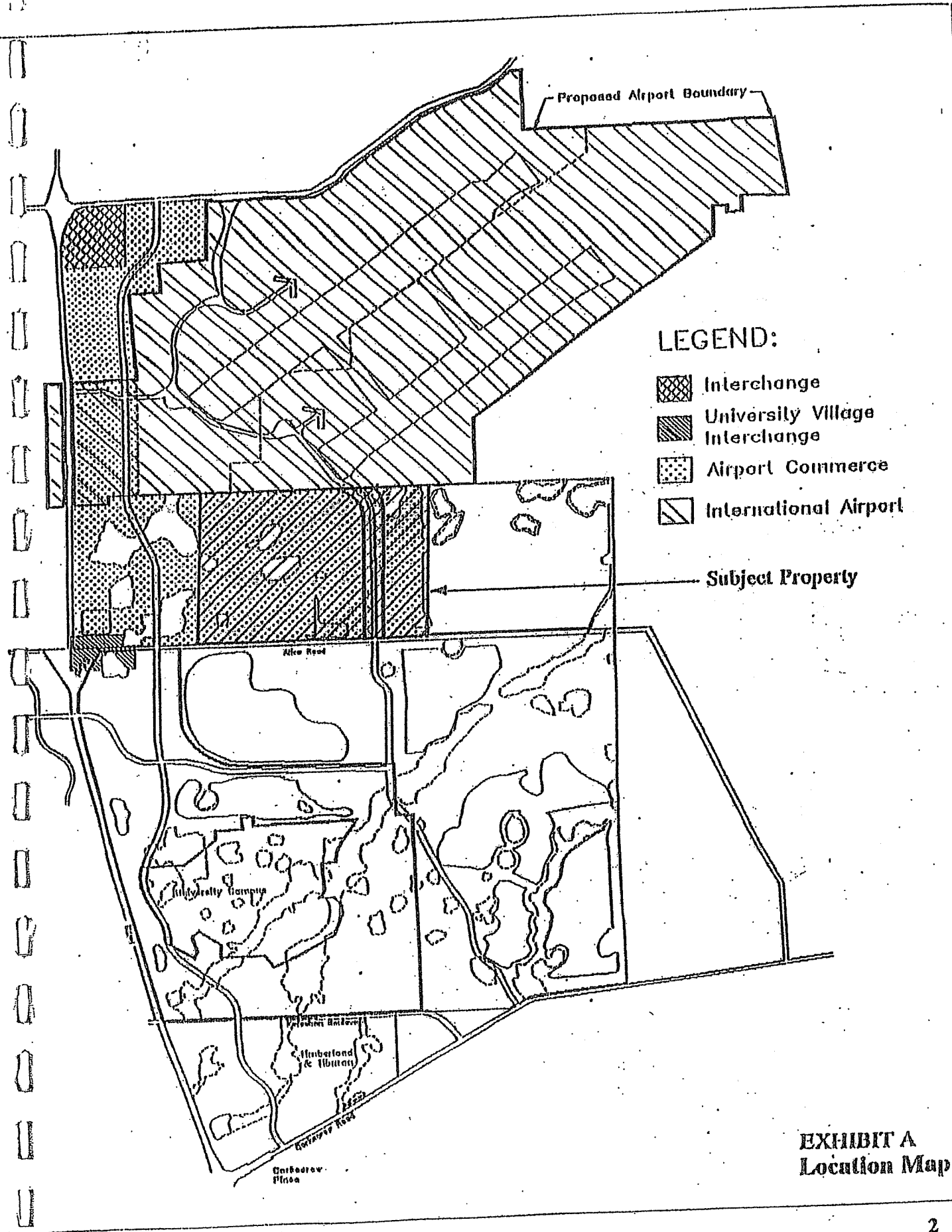


EXHIBIT A
Location Map

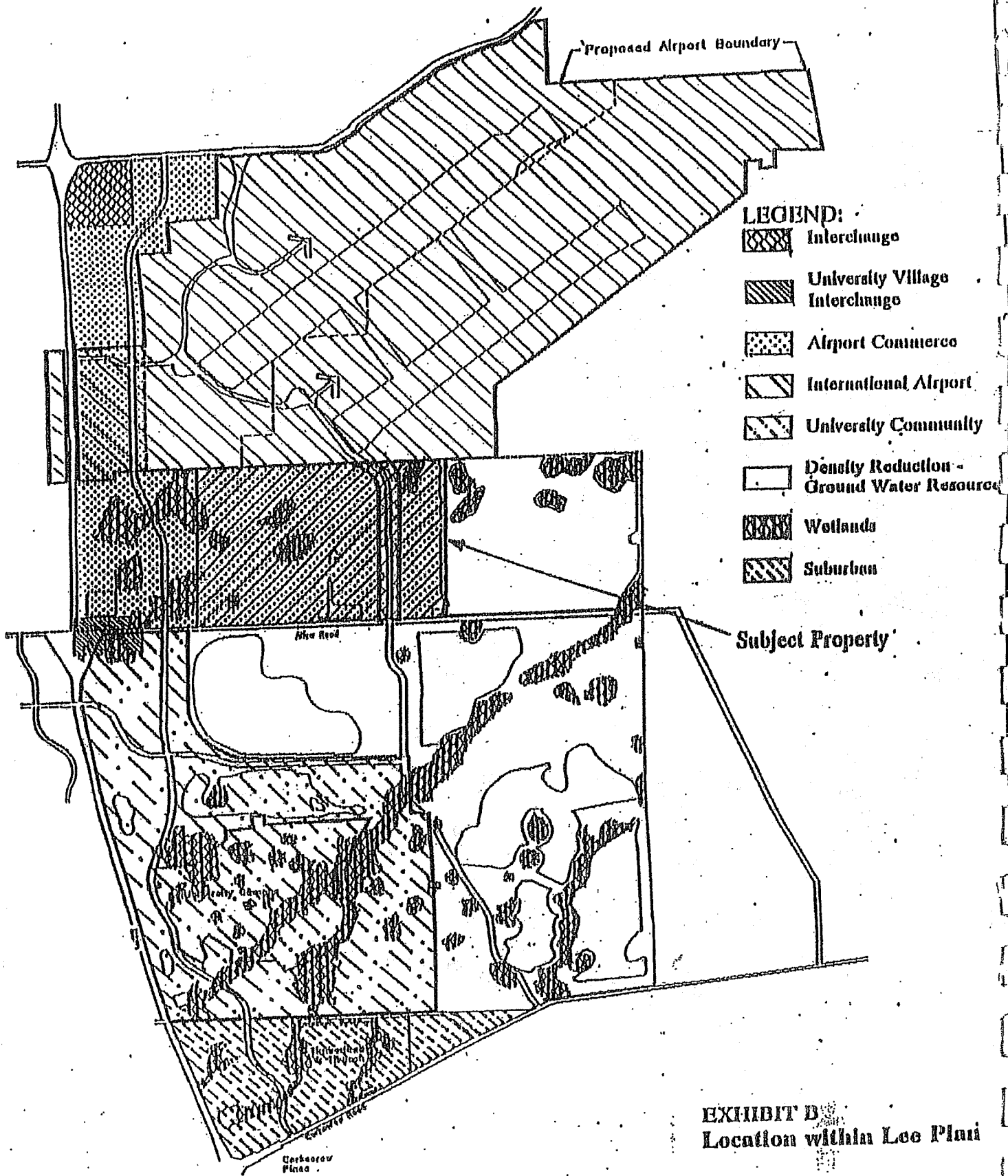


EXHIBIT B
Location within Lee Plan

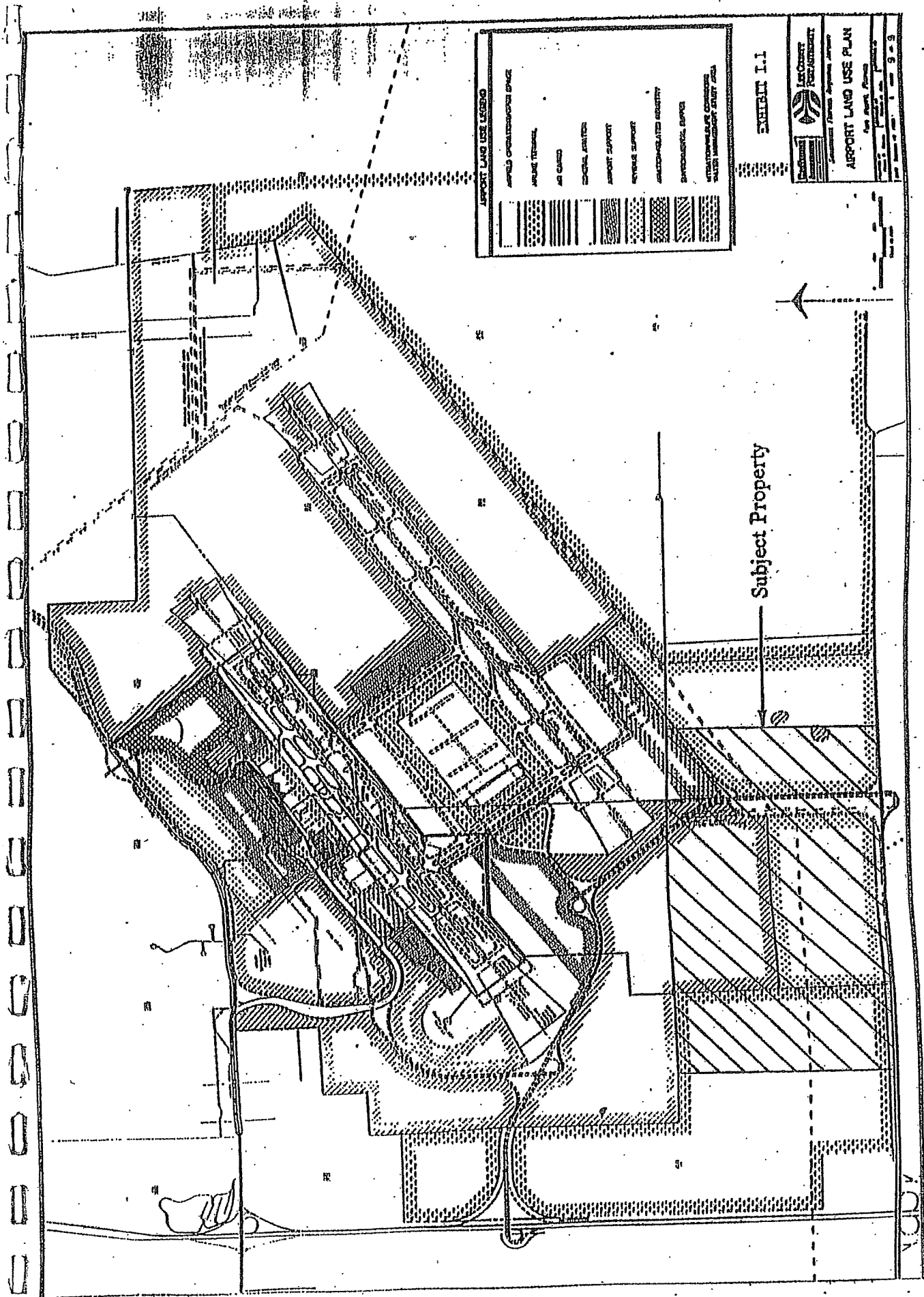


EXHIBIT C1
Airport Acquisition

Airport Master Plan Update described the uses proposed for this area as follows:

Secondary, or induced, impacts result indirectly from the lengthened runway and other projects. The primary induced non-aviation development includes potential activities drawn to the airport by zoning to insure compatible development. Light industrial and "high-tech" plants are likely types of industrial development. Developments outside this area zoned to insure compatible development that are induced largely by their close proximity to the airport will also have a significant impact on the region. This includes commercial office, retail, hotel/motel, restaurant, and residential.

Industrial and commercial activity is expected to grow significantly beyond the traditional bases of retirement, construction, land development, and tourism. High-tech industry and light manufacturing will provide future employment increases for wage earners and professionals. RSW and Lee County I-75 interchanges will serve as the focus for this diversified growth. (p. III-11)

The induced socio-economic impacts of the long term projects will include commercial development induced largely by its close proximity to the airport, such as commercial office, retail, hotel/motel, restaurant, residential (especially housing for airport employees), fuel farms, and rental car agencies. These impacts will likely be significant and are generally considered positive impacts. (p. IV-48)

Any specific development proposal within the parameters set forth herein will require more study through the Lee County development approval process to fully evaluate the impacts of the proposed land use on the natural and man made systems. These will be completed as a part of the permitting process.

We have superimposed the boundaries of the Airport Commerce land use amendment on the County's 1990 Airport Master Plan Update. See Exhibit C2. The uses proposed for this area are not airport uses per se but are "commercial and industrial lands adjacent to the airport needed to accommodate projected growth" related to the airport. That was the County proposal in designating this area as "Revenue Support". The County proposal incorporated in the Alico AMDA with the designation of the area as "World Trade/Employment/Attraction Centers". The text of the Alico AMDA describes this land use as:

This area is to be the focus of expanded job opportunities in central Lee County. The World Trade/Employment/Attraction Centers category is strategically located in the northwest portion of the site where access to rail¹, air and the road network is assured. Many of the land uses proposed for this category are clearly related to the expanded activities of the Southwest Florida Regional Airport, ... Industrial levels of water, sewer,

¹ It should be noted that the rail connection is no longer available to the site.

fire protection and other services will be provided in this area where appropriate. The airport hazard zone regulations will be complied with, where applicable.

The property owner, Alico, Inc., and the Port Authority independently reached the conclusion that development which is compatible with the airport, such as air freight facilities, air support bases, light industrial and "high-tech" plants, transfer facilities, business park, commercial office, retail, service, and hotel/motel are suitable types of development for this property. This development would be induced largely by their close proximity to the airport. The addition of Florida Gulf Coast University to the area creates a synergy that is unparalleled in the area. A business use could be located with easy access both to a university and an expanding airport. Both the property owner, Alico, Inc., and the Port Authority has concluded that it would be a mistake to encourage residential development in the area. The Airport Commerce land use category does not allow residential land uses.

Revised Airport Expansion

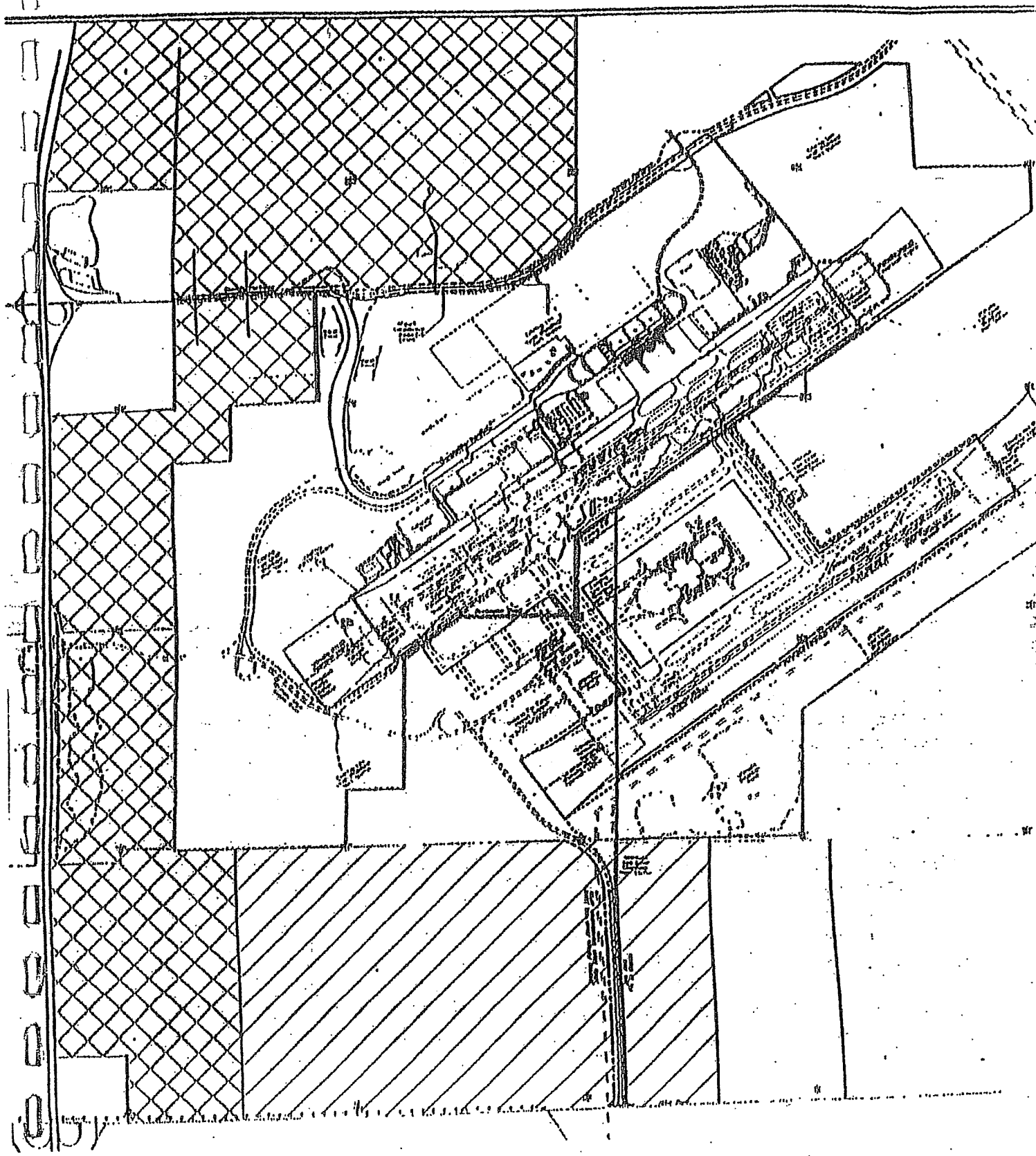
The subject property was also included previously within the area designated for acquisition by the airport before budgetary constraints required a more conservative acquisition area. See Exhibit D. In 1993, the Airport's Master Plan Update was amended to reduce the area slated for acquisition by the airport. The text of that document includes the following language:

The greatest operational difference from the approved plan involves opportunities for development to the south...This development includes areas designated for revenue support opportunities...Most of this property was removed from the refined layout, leaving its development to private industry. Compatible commercial and industrial uses are still recommended for the area...

The revised Master Plan Update shows the proposed Airport expansion abutting the subject property and includes an access to the airport from the south, through the subject property. See Exhibit D.

Development Requiring or Desiring Proximity to the Airport

An informal study was previously completed by the landowner regarding airport-related uses. Comparisons between the Alico property and development near the Orlando Airport (i.e., Lake Nona, Lee Vista Center, Orlando Corporate Center, Semoran Center and the Cabot, Cabot & Forbes Office Park) were considered. In addition, other large scale projects such as Las Colinas outside Dallas, Wellington near Fort Lauderdale and a number of industrial and commercial parks in Tampa were analyzed to assess the compatibility of similar land uses for the land in question. Additional information was also compiled from the Business Development Corporation regarding the needs and desires of businesses locating to this area.





 Existing Airport Commerce
 Proposed Amendment

EXHIBIT D
Revised Airport Acquisition

Developments closely related to airport activities require close proximity to the airport. These can include distribution centers, warehouse facilities and meeting facilities targeted at the traveling professionals. Other developments which choose to be near airports include those which will utilize the airport's shipping facilities. Alico, Inc. has already had inquiries from this type of companies. As the airport expands, it is essential that adequate acreage is provided for these uses in its vicinity. The additional Airport Commerce acreage ensures that these uses will not be precluded.

Expansion of the Airport Commerce Land Use Category

The subject property is the logical extension of the Airport Commerce land use category. The property is sandwiched between property currently designated as Airport Commerce, an approved mining site, the expanding airport and Alico Road. This property may be the last property to receive the Airport Commerce designation.

The Lee County Port Authority has recognized that "the expansion of the existing facility is absolutely necessary to meet the future needs of the region". The clear limitations to the expansion of the Miami International Airport and the expanding trade with South and Central America will require additional space at other airports in South Florida. The Southwest Florida International Airport has the ability to meet that need. See Exhibit B.

ADEQUATE ENVIRONMENTAL PROTECTION MEASURES IN PLACE

Lee County already has in place adequate environmental protection regulations to protect the subject property. No relief from those measures or the adopted regulations of the State of Florida have been requested regarding this property.

Wetlands Not Included in Amendment Request

The requested amendment applies only to the uplands within the subject property. No application has been made to change the land use designation of any of the areas within the subject property which would be designated as Wetlands. The acreage within the perimeter of the subject property totals approximately 1,400 acres. Within that envelope is significant acreage which will be considered to be Wetlands by Lee County. Definitive Wetland jurisdictional determinations will be made on this acreage when the property submits for development approval by Lee County in accordance with the provisions of Objective 1.5 (as amended) of the Lee Plan.

County-wide Environmental Protection Measures

The Lee Plan included extensive sections regarding environmental protection in its Conservation and Coastal Management section. The adopted Land Development Code provides more detailed requirements. Particularly relevant are the provisions in Chapter 14: Environment and Natural Resources which include "Wildlife and Habitat Protection",

Wellfield Protection", "Wetland Protection", and "Tree Protection" requirements. In addition, the subject property is governed by all other applicable Lee County Regulations.

Six Mile Cypress Regulations

In setting out the parameters for the Airport Commerce land use category, it was assumed that this land use category would be applied only to properties within the Six Mile Cypress Basin. The subject property fits that requirement as it lies totally within the Basin. See Exhibit E. The subject property is also subject to the "special environmental and design review guidelines" imposed on properties in this part of Lee County.

GROUNDWATER RESOURCE

Subject Area Not Designated For Future Wellfields

The Henigar & Ray Groundwater Resource Protection Study dated July 28, 1993, sets forth areas that had "potential for development of the water table aquifer for future water supply needs". On January 27, 1994, however, the Lee County Regional Water Supply Authority conceptually approved the Lee County Regional Water Supply Authority Master Plan. The Master Plan analyzes the potable water needs for Lee County in 10-year increments through the year 2030 and makes recommendations as to the size and location of future wellfields. Exhibit F shows the locations of these wellfields. None of the wellfields is located on the subject property.

Airport Expansion Precludes Future Wellfields

Because of concerns about the stability of the runways at the International Airport, major withdrawals would not be permitted in this proposed expansion to the Airport Commerce land use category.

Henigar & Ray's "Scenarios"

The Henigar & Ray study includes a number of "scenarios", described by them as "not suggested as the potential final land use designations...but rather for discussion purposes based on groundwater protection scenarios". The text includes on page 43 the following language:

...sound growth management planning principles take into account many other aspects of the impact of growth besides groundwater. Proper planning requires a comprehensive approach to issues analysis and considers other equations such as compatibility, levels of service, sprawl, population projections, analysis of community needs issues, and surface water issues to name a few.

Lee County has proposed through the subject Plan amendment, as well as related text amendments, to set forth another land use scenario which will protect the area's

groundwater resource while still allowing development compatible with the expanding airport.

In Henigar & Ray ranking of areas within the Density Reduction Groundwater Resource land use category, the subject property was designated as both "Area A" and "Area B". Generally the property is divided with the northerly half within Area B and the property between that and Alico Road within Area A. See Exhibit G. Sound growth management planning principles cannot ignore the area's transportation network, permitted excavation sites and adjacent existing and proposed land uses.

GROUNDWATER RESOURCE PROTECTION

A number of measures have been adopted by Lee County relating to the protection of the area's groundwater resources. The adoption of additional regulation is recommended through the proposed EAR amendments.

County-wide Water Resource Protection Measures

The Lee Plan includes extensive provisions under Goal 39: Protection of Water Resources. The adopted Land Development Code provides more detailed requirements. Particularly relevant are the provisions in Chapter 14: Environment and Natural Resources which include "Wellfield Protection" requirements. In addition, the subject property is governed by all other applicable Lee County Regulations.

Six Mile Cypress Regulations

Among the provisions of the Lee Plan are a number of policies related to the protection of groundwater in the Six Mile Cypress Watershed. They are listed under Goal 38: "Coordinated Surface Water Management and Land Use Planning on a Watershed Basis". The Six Mile Cypress Basin is specifically mentioned in Policy 38.3.1 and Policy 38.3.2, Objective 38.4, Policy 38.4.1, Policy 38.4.2 and Policy 38.4.3

Special Groundwater Protection Measures

Based on the adopted EAR, Lee County has proposed that language be added to Policy 1.2.2, the Airport Commerce land use category description. It provides that all development within the subject property be reviewed and developed as planned developments and it provides that best management practices be utilized.

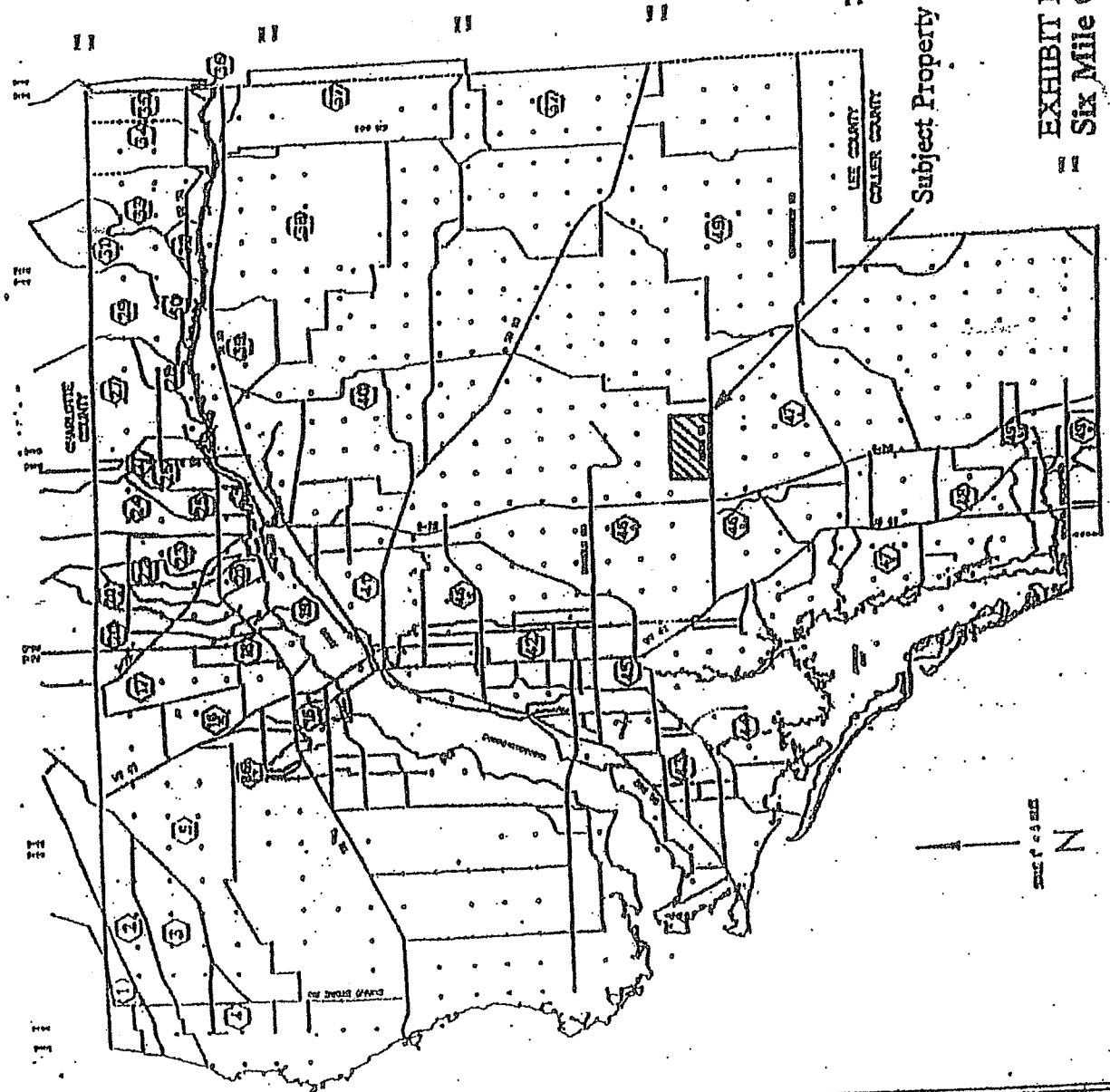
...Property in [subject property] must be rezoned to a planned development zoning category prior to any development other than the construction of essential public services. During the rezoning process, the best environmental management practices identified on pages 43 and 44 of the July 28, 1993 Henigar & Ray study entitled, "Groundwater Resource Protection Study" will be rebuttably presumed to be necessary to protect potential groundwater resources in the area.

- 1 TUCKER CREEK
- 2 DUDEN CREEK
- 3 GREENWELL BRANCH
- 4 LONGVIEW RUN
- 5 GATOR CREEK
- 6 HANCOCK CREEK
- 7 YELLOW PEVER CREEK
- 8 YELLOW PEVER - EAST BRANCH
- 9 FORELL CREEK
- 10 WASH POND
- 11 CORN BRANCH
- 12 DAUGHTERY CREEK
- 13 DAUGHTERY - EAST BRANCH
- 14 CHAPEL BRANCH
- 15 BAYSHORE CREEK
- 16 PURUSH CREEK
- 17 STROUD CREEK
- 18 PAUL CREEK
- 19 KODLPOD CREEK
- 20 OTTL CREEK
- 21 TROP CREEK
- 22 OTTER CREEK
- 23 TELEGRAPH CREEK
- 24 FRANKLIN RUN
- 25 FIGHTER BRANCH
- 26 PARK BRANCH
- 27 CYPRESS CREEK
- 28 SPANISH CREEK
- 29 HULLET'S CREEK
- 30 COUNTY LINE
- 31 BEDMAN CREEK
- 32 HENRY CREEK
- 33 CLAY
- 34 ORANGE RIVER
- 35 RILEY CREEK
- 36 WHISKEY CREEK
- 37 DEEP LAGOON
- 38 COW CREEK
- 39 HENDON CREEK
- 40 SIX MILE CYPRESS
- 41 HULLOCK CREEK
- 42 TENHULE CREEK
- 43 ESTERO RIVER
- 44 HALLWAY CREEK
- 45 SPRING CREEK
- 46 IMPERIAL RIVER
- 47 LEINER CREEK
- 48 OAK CREEK
- 49
- 50

ALL RIGHTS RESERVED BY THE STATE OF FLORIDA
 REPRODUCED FROM THE ORIGINAL MAP
 BY THE STATE OF FLORIDA

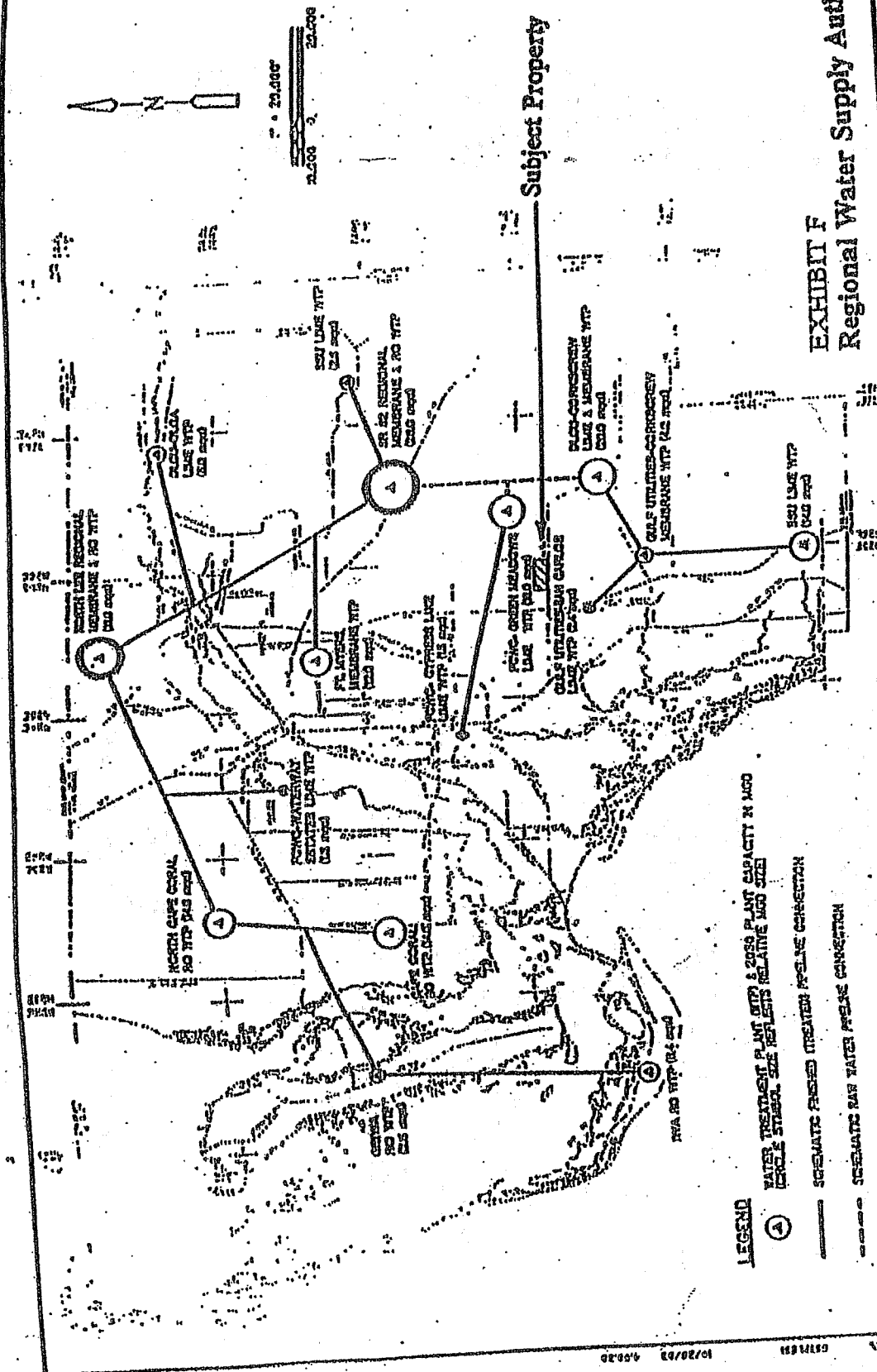
Map 18
 Lee County Watershed Map

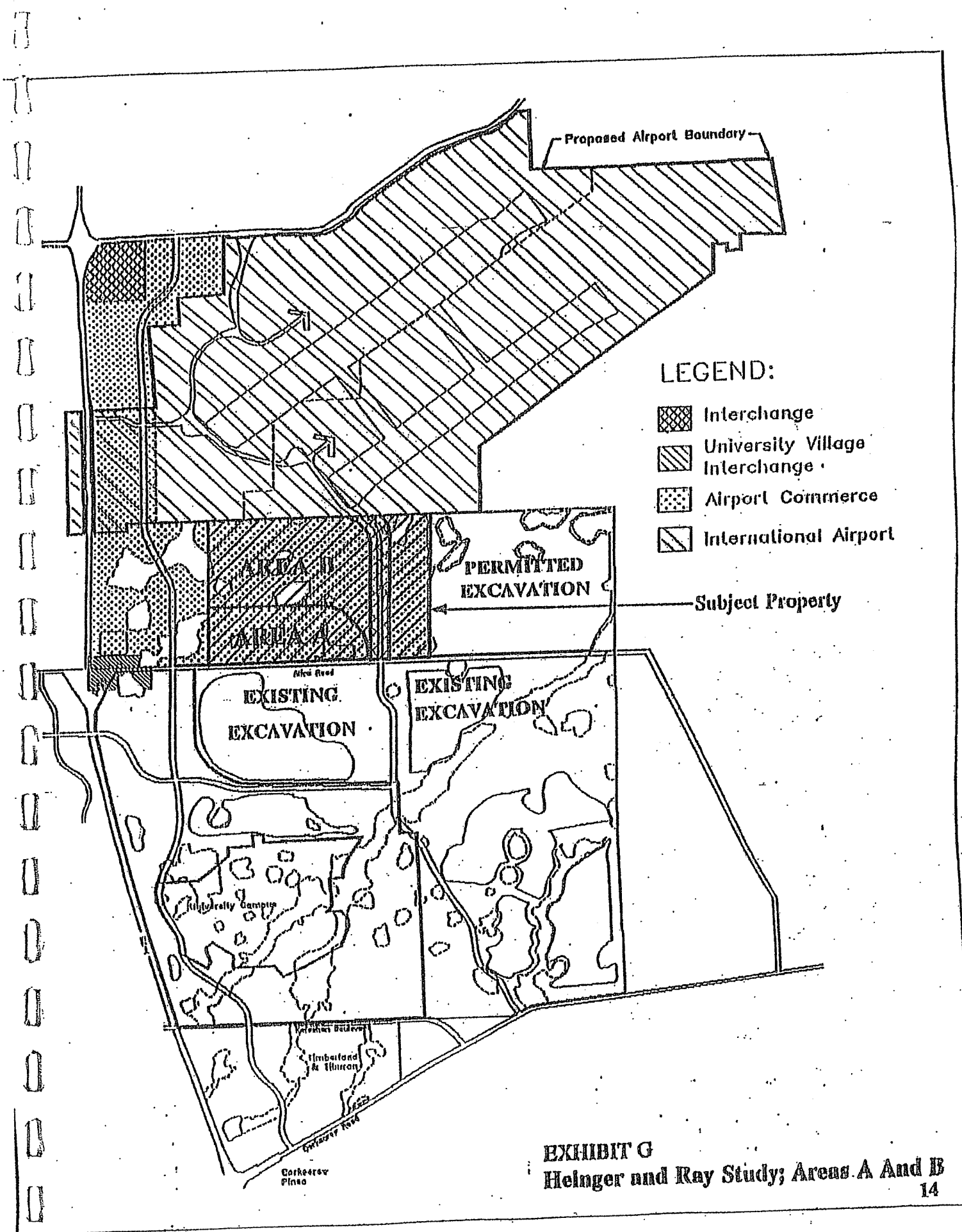
EXHIBIT E
 Six Mile Cypress Basin



Amended by Ordinance 92-35
 12-15-1990 67-34 17500-510WS 34

MAP 1





LEGEND:

- Interchange
- University Village Interchange
- Airport Commerce
- International Airport

EXHIBIT G
Helinger and Ray Study; Areas A And B
14

Wastewater Treatment Facilities

One of the specific post development performance standards included in the Henigar & Ray Study is "No septic systems at densities greater than 1 dwelling unit per net acre". The area is adjacent to the expanded Gulf Utilities Wastewater Treatment franchise area. Through all of their discussion with the county and included within the Alico AMDA is the commitment that the area will be developed under a central wastewater system. The language in the AMDA text is as follows:

An on-site treatment and disposal plant will be provided within the Alico Inc./Central Lee County Property. (p. 21-3)

LAND USE SUITABILITY

In reaching the conclusion that "Airport Commerce" type uses would be suitable for this property, both the Port Authority and Alico Inc. completed numerous studies. They include soil suitability analysis, vegetation and wildlife studies, transportation studies and groundwater analyses.

Among the attributes of the subject property for Airport Commerce type land uses are its unified control, ability to provide large parcels of land, proximity to the area's main transportation network, the ability to provide assurances of quality control through deed restrictions and ability to provide the requisite infrastructure.

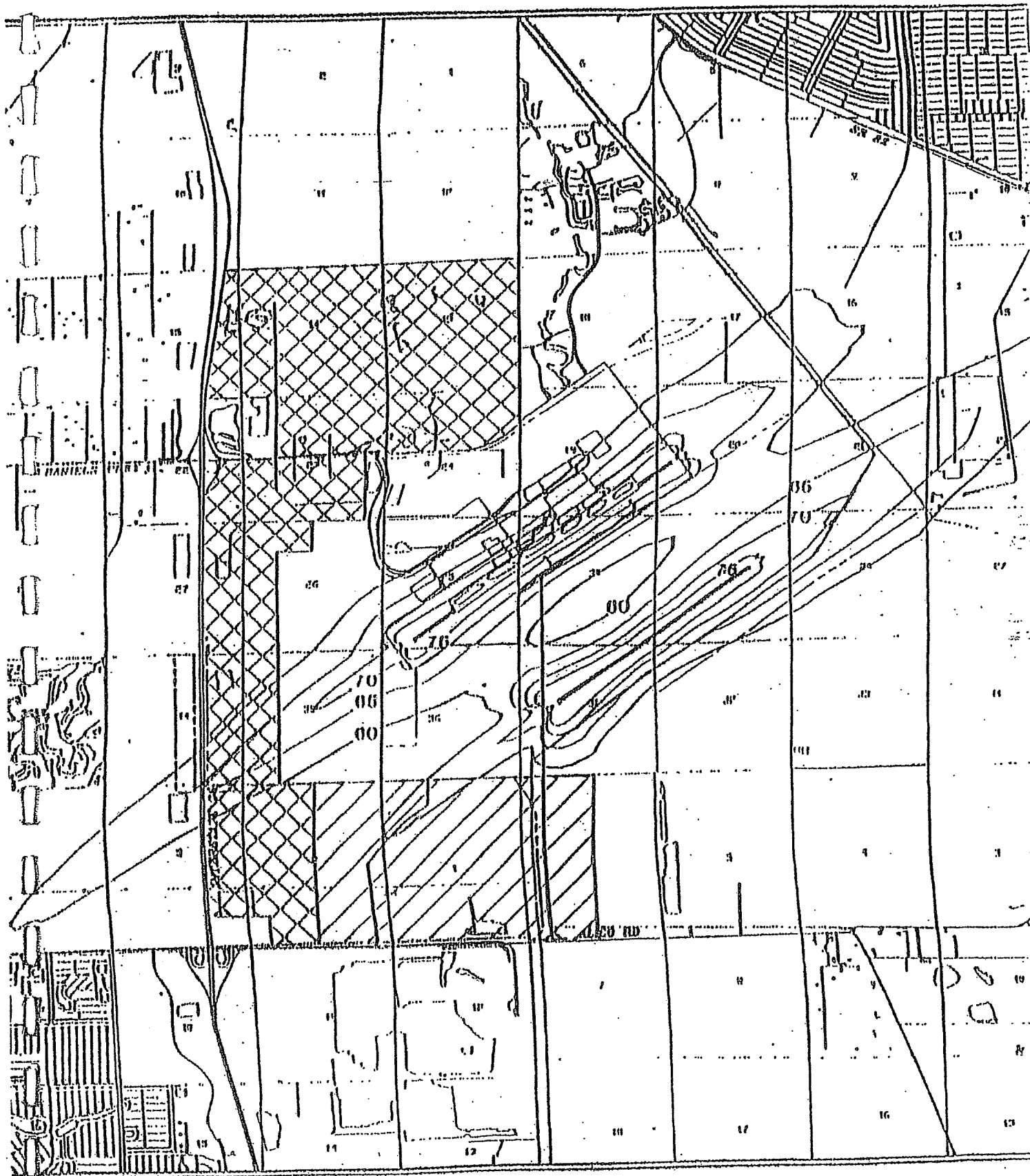
Airport Noise Levels

Exhibit H depicts the expected noise contours related to the expansion of the Southwest Florida International Airport as well as the location of the subject property. It is clear that parts of the subject property are not suitable for residential land use. Areas are within the 60 and 65 Ldn noise contour. Further it is anticipated that with the expansion of the Airport an expansion of the Airport Noise Zone Overlays to include all or virtually all of the subject property will be required. The current Lee Plan land use designation allows residential land uses, whereas the proposed Airport Commerce land use category precludes the incompatible residential land uses.

Vegetation and Soils

Information on the Vegetation and Soils of this property was reviewed by Lee County and the Department of Community Affairs as a part of the Alico AMDA review. A copy of the Vegetation and Soils map is attached with the subject area indicated. See Exhibits I and J. See also later discussion regarding the site's Resource Protection areas.

The soils on the subject property are typical of those in Lee County. The table included in Appendix C indicates the soils with limitations in regard to supporting low lying buildings or for the construction of pond embankments. These limitations can be overcome using a



 Existing Airport Commerce


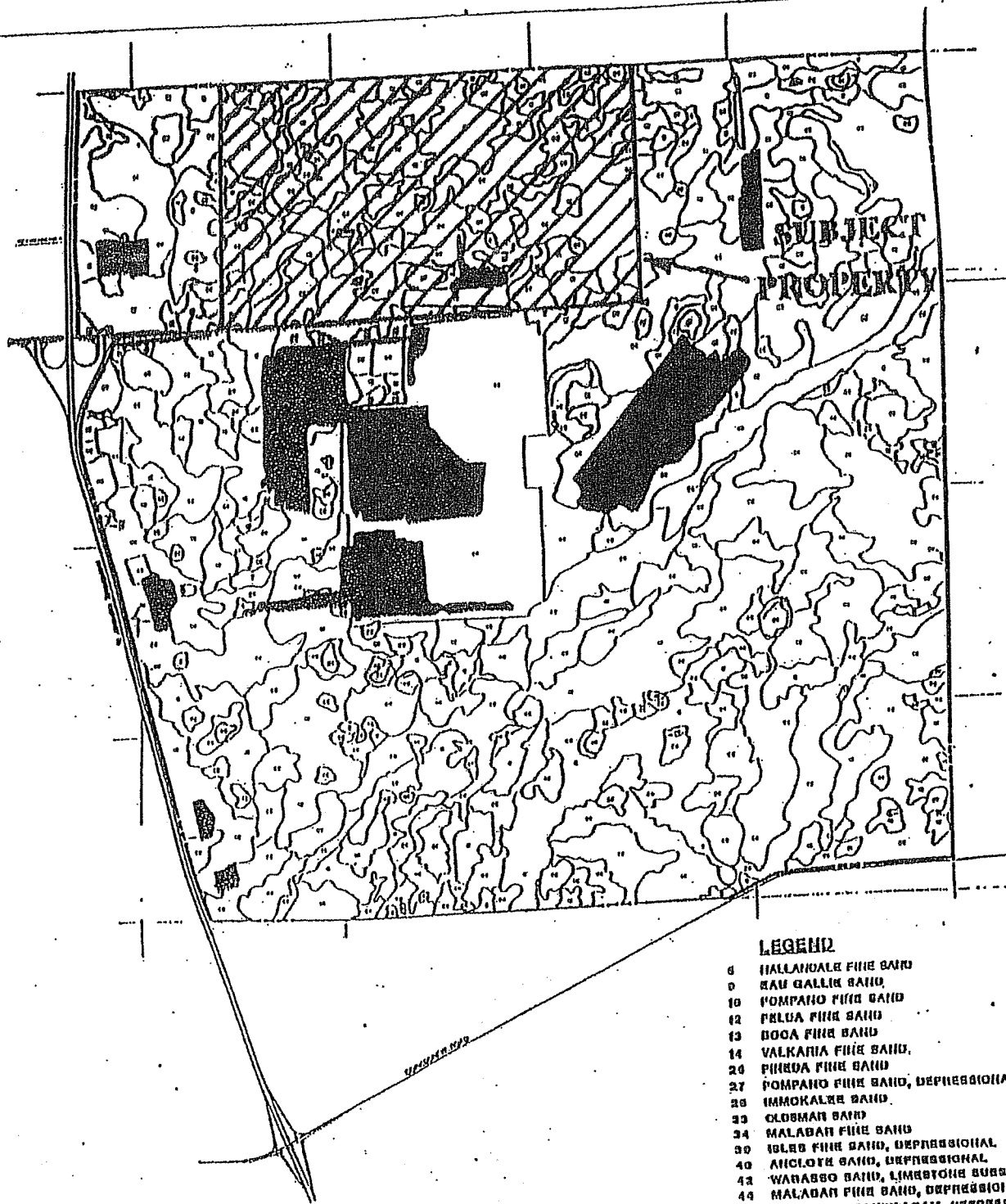
 Proposed Amendment

EXHIBIT H
Airport Noise Contours
16



SOILS

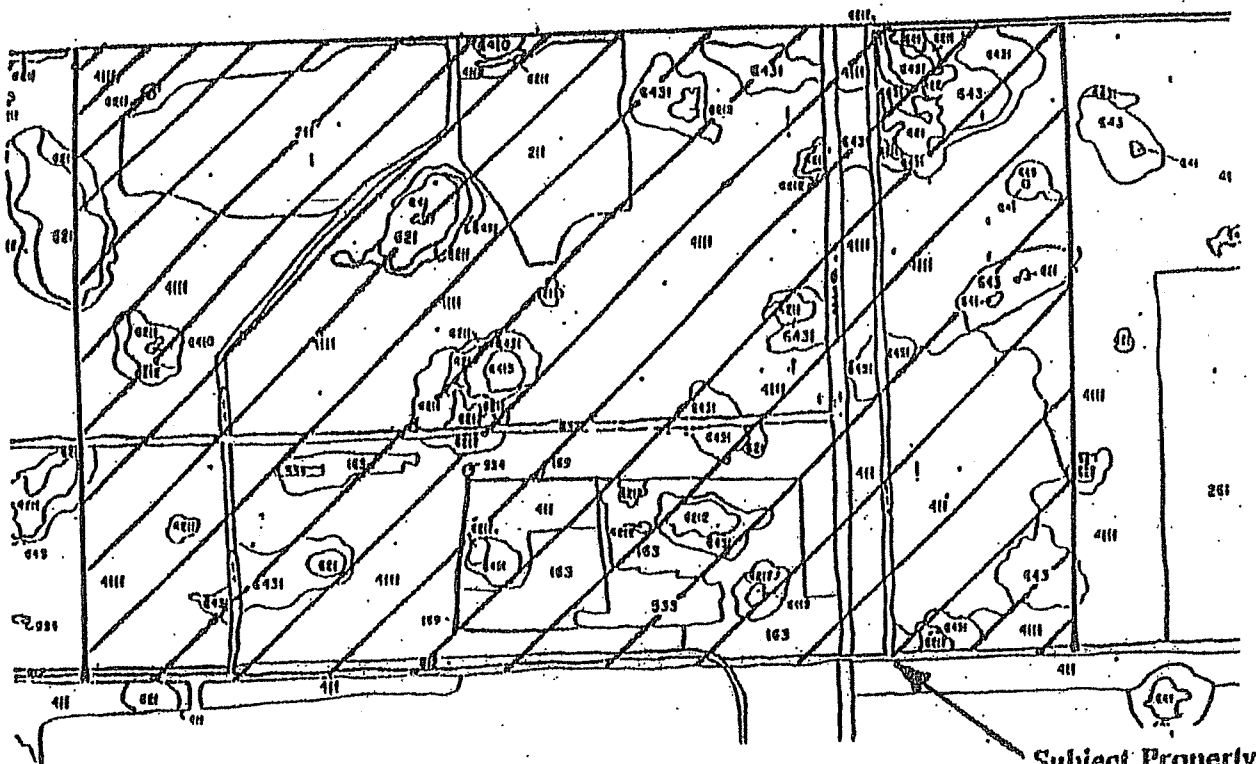
ALCOA, INC. / CENTRAL FLA COUNTY PROPERTY
JANUARY 1980

WILSON • MILLER • BARTON • SOIL & ROCK, INC.
ENGINEERS PLANNERS SURVEYORS
LANDSCAPE ARCHITECTS ENVIRONMENTAL CONSULTANTS
4071 BIRCHMAN, BOCA RATON, FL 33496 (407) 588-1000
FAX (407) 588-7470

LEGEND

- 6 HALLANDALE FINE SAND
- 9 SAU GALLIE SAND
- 10 POMPAHO FINE SAND
- 12 FELDA FINE SAND
- 13 BOCA FINE SAND
- 14 VALKARIA FINE SAND
- 20 PINEDA FINE SAND
- 27 POMPAHO FINE SAND, DEPRESSIONAL
- 28 IMMOKALEE SAND
- 33 CLOSMAN SAND
- 34 MALABAR FINE SAND
- 30 ISLES FINE SAND, DEPRESSIONAL
- 40 ANICLOTH SAND, DEPRESSIONAL
- 42 WABASSO SAND, LIMESTONE SUBSTRATUM
- 43 MALABAR FINE SAND, DEPRESSIONAL
- 45 COPELAND SANDY LOAM, DEPRESSIONAL
- 46 FELDA FINE SAND, DEPRESSIONAL
- 51 FLORIDANA SAND, DEPRESSIONAL
- 52 WINDEN SAND, DEPRESSIONAL
- 59 MALLACHIA GRAVELLY FINE SAND
- 73 PINEDA FINE SAND, DEPRESSIONAL
- 74 BOCA FINE SAND, BLOOMING
- 80 WATER

EXHIBIT I
Soils



ALICO
VEGETATION ASSOCIATIONS
PLANT ASSOCIATIONS

- 001 Single Family Residential
- 002 Rock/Coverage
- 003 Birch/Redwood/Canal
- 004 Improved Pasture
- 005 Row Crops
- 006 Fallow Crop Land
- 007 Palmetto Swale
- 008 Palmetto Swale-Holmwood less than 50%
- 009 Pine Flatwoods
- 010 Pine Flatwoods/Holmwood less than 50%
- 011 Pine Flatwoods/Holmwood greater than 50%
- 012 Pine Flatwoods/Scrubland Pepper-less than 50%
- 013 Brazilian Pepper

- 024 Holmwood
- 025 Temperate Hardwood
- 026 Australian Pine
- 027 Reservoirs larger than 100 acres, but less than 500 acres
- 028 Reservoirs larger than 10 acres, but less than 100 acres
- 029 Reservoirs less than 10 acres which are dominant features
- 030 Willows
- 031 Cypress
- 032 Cypress/Holmwood-less than 50%
- 033 Cypress/Holmwood-greater than 50%

- 034 Cypress/Brazilian Pepper less than 50%
- 035 Freshwater Marshes
- 036 Freshwater Marshes/Holmwood-less than 50%
- 037 Freshwater Marshes/Brazilian Pepper-less than 50%
- 038 Wet Prairies
- 039 Wet Prairies/Holmwood less than 50%
- 040 Wet Prairies/Holmwood greater than 50%
- 041 Wet Prairies/Brazilian Pepper-less than 50%
- 042 Railroads
- 043 Roads and Highways
- 044 Electrical Power Transmission Lines

number of stabilizing treatments. According to the Soil Conservation Service, there are no Prime Farmlands and there are no Unique Farmlands within the proposed Airport Commerce expansion area.

Topography

Information on the topography of this property was reviewed by Lee County and the Department of Community Affairs as a part of the Alico AMDA review. The lack of relief on the subject property is one of the attributes that make the property suitable for Airport Commerce type land uses. A copy of the topographic map is attached with the subject area indicated. See Exhibit K.

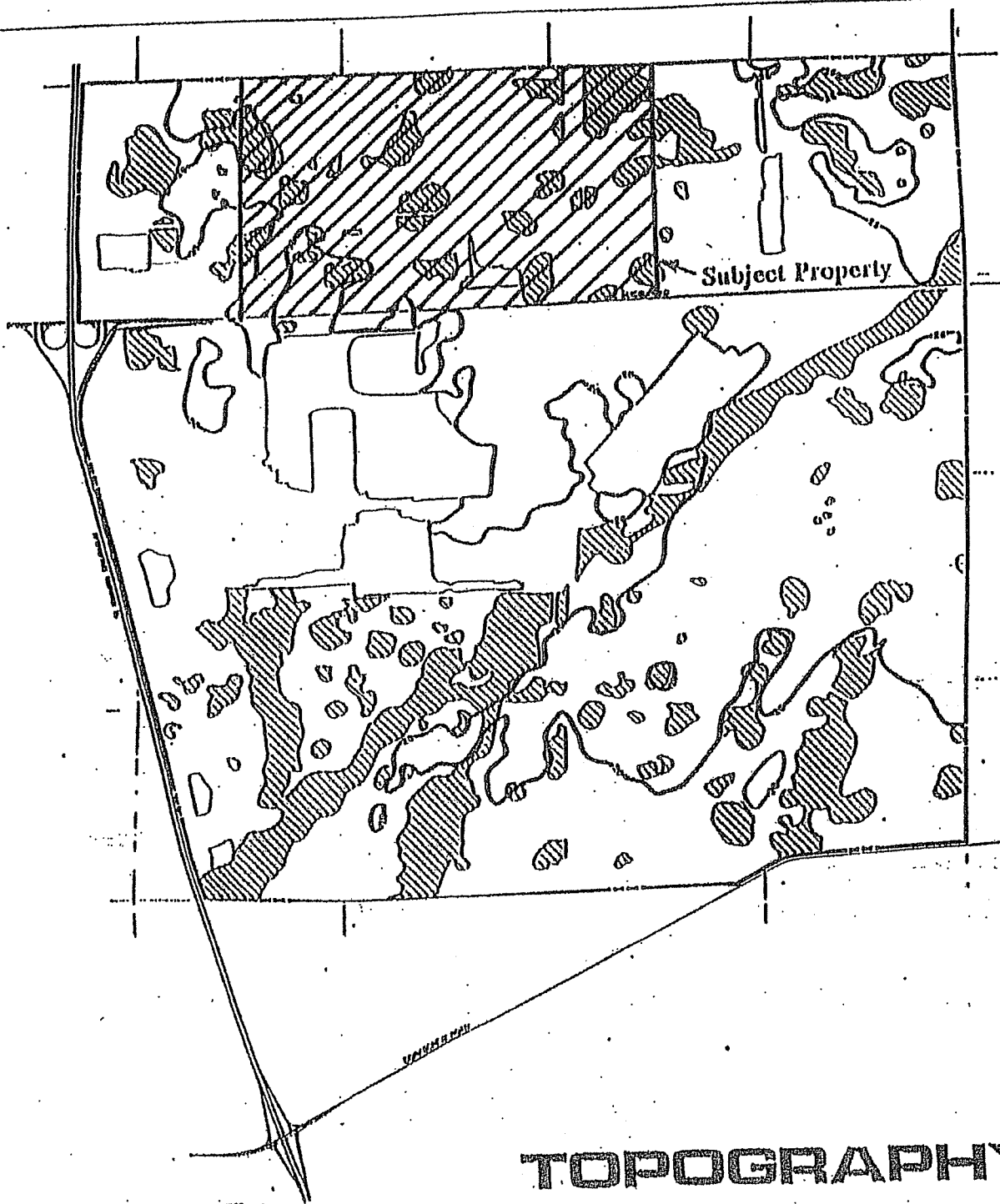
Transportation Network

The subject property is adjacent to Interstate 75 and Alico Road. A number of transportation improvements are proposed within the area. They include the extension of Treeline Boulevard and the construction of a southerly access to the Airport. The specific alignment of the "Airport Expressway", a limited access roadway linking Summerlin Road, US 41 and I-75 to the Airport, is being studied at this time in conjunction with a FDOT study of the Interstate 75 corridor. All of the proposed alignments run east-west through the subject property in a corridor extending from Alico Road to the property's northern boundary. The specific alignment sent to FDOT for review placed the Expressway approximately one-half mile north of Alico Road. The proposed transportation network depicted on both the County's 2010 Needs Plan and its 2010 Financially Feasible Plan². See Exhibit L.

Industrial Suitability

The subject property, as discussed earlier, meets the special location requirements for industrial development. The completion of the Regional Airport and the recent completion of I-75 provide two main transportation links which are now available for Lee County's industrial enterprises. The extension of Treeline Boulevard from Colonial Boulevard to Corkscrew Road will provide north-south access without having to utilize I-75. The planned transportation network will serve industrial development well. The southerly access to the airport has been considered as a freight entranceway, a "back door to the airport". Future planning in the area could result in this being an additional front door as well. The property owner has committed to provide any special utility provisions for industrial land uses at the subject location. Finally, the location of the subject property meets the Lee Plan criteria of a close home-work commute for industrial employees.

² A study is currently under way in Lee County which will result in a 2020 Needs Plan.



TOPOGRAPHY

ALICO, INC. / CENTRAL LEE COUNTY PROPERTY
JANUARY 1980

WILSON • MILLER • BARTON • BOLL & PEEK, INC.
ENGINEERS PLANNERS SURVEYORS
LANDSCAPE ARCHITECTS ENVIRONMENTAL CONSULTANTS
1071 COLONIAL BOULEVARD
FORT MYERS, FLORIDA 33901
(813) 938-1000 FAX (813) 938-7470

1. HIGHEST CONTOUR
SHOWN IN AREA
PROPOSED LAKES



NOTES

CONTOUR INTERVAL 5-10-1, 10 FEET,
N.E.D.
THE ALICO SITE IS LOCATED ABOVE THE 100 YEAR
FLOOD FLOOD AREA,
L.E.P. PLAN, 1980
FEDERAL EMERGENCY MANAGEMENT AGENCY, 1984
SOIL CONSERVATION, 1980

REMARKS: THIS TOPOGRAPHIC MAP IS BASED ON AERIAL PHOTOGRAPHS
DATED MAY 1980.

EXHIBIT K
Topography 19

LEE COUNTY MPO 2010 FINANCIALLY-FEASIBLE PLAN

ADOPTED NOVEMBER 17, 1988
AMENDED FEBRUARY 18, 1989; NOVEMBER 1, 1989;
NOVEMBER 1, 1990; MAY 24, 1991;
JUNE 21, 1991; JULY 31, 1992;
JANUARY 22, 1993

LEGEND

PLANNED
EXISTING
PROGRAMMED FOR
CONSTRUCTION

IMPROVEMENT: EXPRESSWAYS

2 LANES
4 LANES

DIVIDED ARTERIALS OR COLLECTORS

2 LANES
3 LANES
4 LANES
6 LANES

UNDIVIDED ARTERIALS OR COLLECTORS

2 LANES
4 LANES

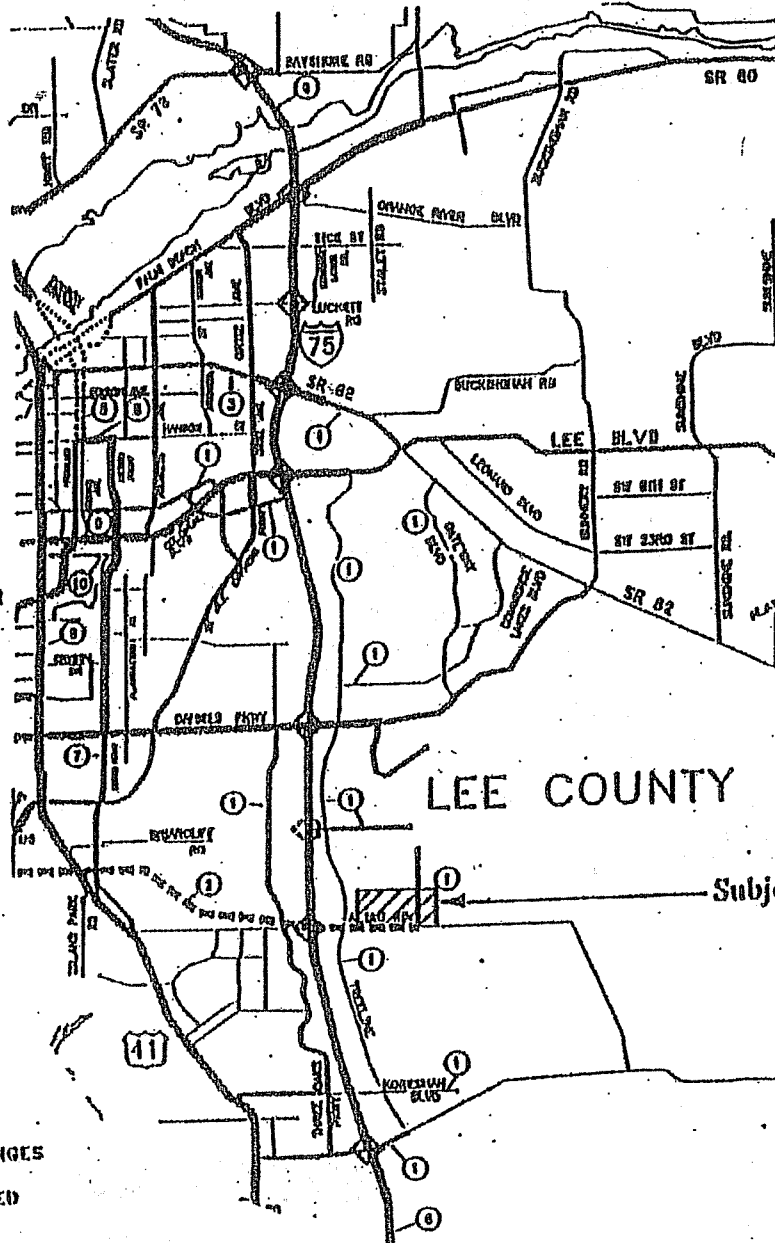
ONE-WAY PAIR

2 LANES
3 LANES

BRIDGE CONNECTOR

GRADE SEPARATED INTERCHANGES

EXISTING PLANNED



- 1 ASSIGNED TO BE PRIVATE-SECTOR FUNDED
- 2 ASSUMED TO BE TOL. FINANCING
- 3 EXPAND TO 4L (BL IN NEEDS PLAN) ROW FOR BL FUNDED
- 4 EXPAND TO 4L (BL IN NEEDS PLAN)
- 5 FURTHER EXPAND TO 4L TO BL OR FURTHER/EXPAND; ONE-WAY PAIR IS INCLUDED IN F-F PLAN
- 6 L-7R TO BE EXPANDED BEYOND 4 LANES, CONFIGURATION TO BE DETERMINED BY I-75 MASTER PLAN
- 7 BURN/EXPAND METRO (BL IN NEEDS PLAN)
- 8 EXPAND TO BL PER ALL 11 CORRIDOR STUDY
- 9 ON-RAMP/EXPANDMENTS SHOULD BE DETERMINED BY CORRIDOR STUDY
- 10 EXTENSION OF NORTH AIRPORT ROAD TO METRO BY LEE COUNTY
- 11 ADDITIONAL FUNDING FOR THIS PROJECT TO BE IDENTIFIED BY LEE COUNTY

EXHIBIT L
Transportation Network

LAND USE COMPATIBILITY

As stated earlier, the property owner, Alico, Inc., and the Port Authority independently analyzed the types of development that would be compatible and what would not be compatible with the expanding airport. Both concluded that residential development should not be encouraged in the area.

In their studies, both the property owner, Alico, Inc., and the Port Authority looked to the experience of the older airports for guidance. Activities such as shipping and freight forwarding are often located on property adjacent to airports. Spin-off operations including warehouse and delivery services, transfer facilities, office complexes, high-tech electronics and communications companies and a variety of other business services are often located on property identically located as the subject property. Other business that are do not necessarily rely directly on the airport for their operation, located near an airport because they value the prestige, services and/or the accessibility of a location near an airport for their customers and workers. Table 1 presents the different type of land uses attracted to airports. Providing for these uses on suitably located property is consistent with the requirements of the industrial needs study completed by Tom Roberts for Lee County.

Lee County needs to ensure that whatever development occurs on the subject property is compatible with the airport and that additional Airport Commerce acreage in the appropriate location is not precluded in the future. It would not be in anyone's best interest to have this area develop into incompatible high end residential uses, such as happened with the Lake Nona development adjacent to the Orlando Airport.

Adjacent Land Uses

Existing and proposed land uses adjacent to the subject property are compatible with the Airport Commerce land use category.

North	Southwest Florida International Airport
South	Alico Road, University Community and Florida Rock's plant and mining activities
East	Florida Rock's proposed mining activities approved by Lee County
West	Existing Airport Commerce property

Exhibit M depicts these adjacent uses in relation to the subject property. See also Exhibits A and B which present the subject property and adjacent land use designations.

Table 1

TYPES OF BUSINESS ACTIVITY
RANKED BY DEGREE OF ATTRACTION TO THE
VICINITY OF AIRPORTS

Very High Concentration Near Airport

- Air transportation services
- Aerospace equipment
- Manufacturers of optical instruments and lenses
- Manufacturers of communications equipment
- Manufacturers of electrical distribution equipment
- Freight forwarding

High Concentration Near Airport

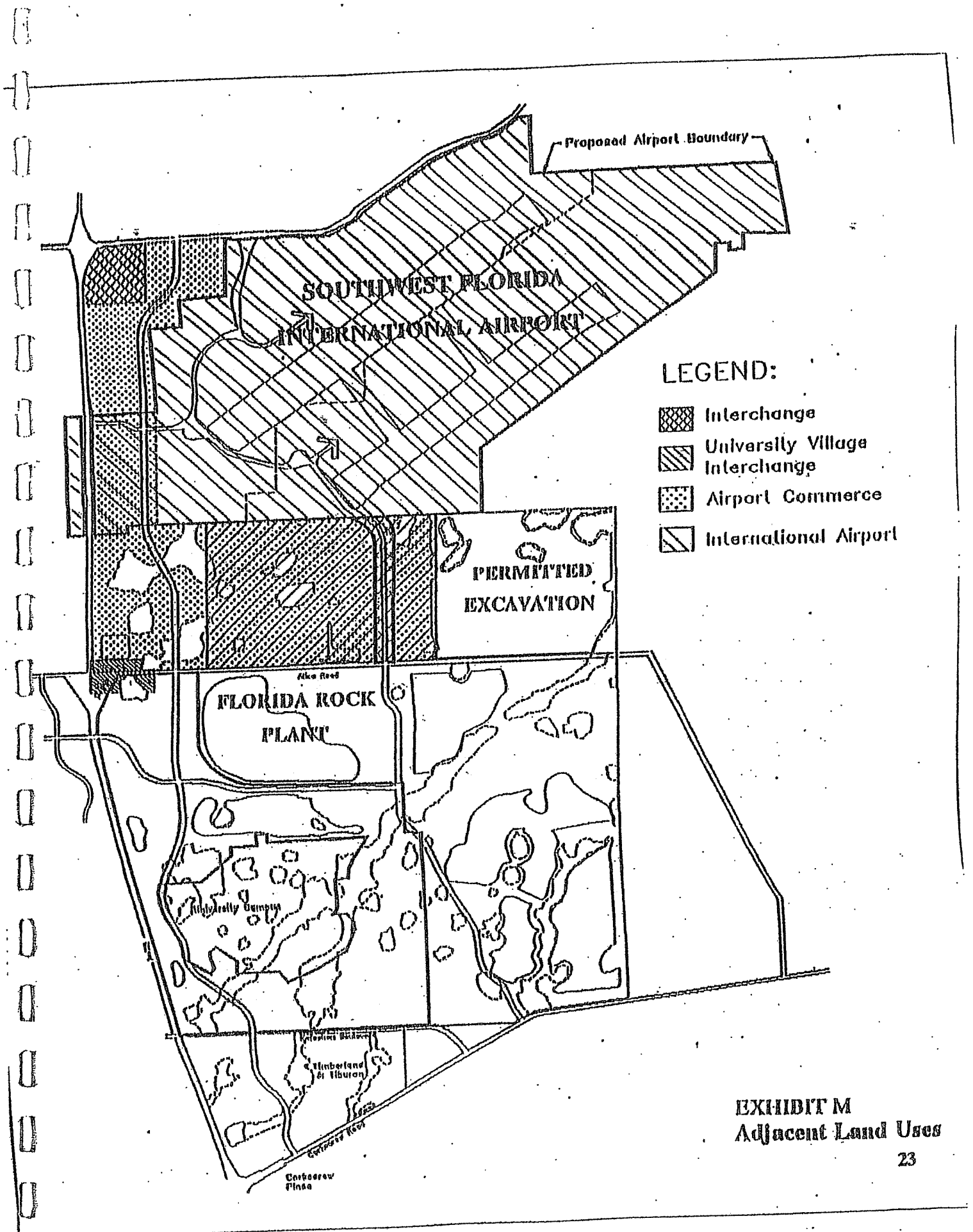
- Manufacturers of electric and electronic equipment
- Manufacturers of specialty chemical products
- Public warehousing
- Manufacturers of instruments, measuring and control
- Air transportation services
- Mailing and delivery services
- Specialty fabricated metal products
- Wholesaling of pharmaceutical products

Moderate Concentration Near Airport

- Automobile rentals
- Printing and publishing
- Manufacturers of converted paper products
- Manufacturers of electronic components and accessories
- Construction
- Buses and taxis
- Building services
- Hotels/motels
- Automobile parking
- Manufacturers of medical instruments and supplies
- Automotive services
- Manufacturers of specialty plastics parts

Increasing Concentration Near Airport

- Travel Agent
 - Public warehousing
 - Specialty machinery
 - Mailing and related services
 - Computer data processing services
-



LEGEND:

-  Interchange
-  University Village Interchange
-  Airport Commerce
-  International Airport

EXHIBIT M
Adjacent Land Uses

LEE PLAN

The Lee Plan future land use map, as described in the EAR, depicts a planning horizon to the year 2020. Today the map depicts Airport Commerce related to the existing airport and the existing transportation network.

Changing Conditions

As Lee County continues to grow and respond to new employment opportunities, the distribution of land uses begins to settle into a workable configuration. These changes are evident in many ways, particularly within the discussion of the subject property. With the county's commitment to the airport expansion, its commitment to the Florida Gulf Coast University, and its commitment to upgrading the transportation network in the vicinity, the proposed changes to the Airport Commerce land use category are warranted. The proposed land use map amendment is a logical reaction to these changed circumstances. No other property is as well suited because this property has better access and a better relationship to the expanding airport than some of the existing properties.

Consistency with Adopted Lee Plan Goals, Objectives and Policies

The following are the Lee Plan Goals, Objectives and Policies cited by DCA.

OBJECTIVE 87.1: WATER SUPPLIES.

Insure water supplies of sufficient quantity and quality to meet the present and projected demands of all consumers and the environment, based on the capacity of the natural systems.

Given the conditions imposed through this process, the proposed Airport Commerce land use designation on the subject property is consistent with this Objective. Through the year 2030, the subject area has not been shown as a future wellfield area.

POLICY 87.1.1:

Natural water system features which are essential for retention, detention, purification, runoff, recharge, and maintenance of stream flows and groundwater levels shall be identified, protected, and managed.

Given that the subject property is still subject to Lee County and South Florida Water Management District requirements which relate to the concerns included in the policy, the proposed amendment is consistent with the policy. See discussion above regarding Groundwater Resource Protection.

OBJECTIVE 41.2: DENSITY REDUCTION/GROUNDWATER RECHARGE.

County staff shall review all technical data concerning groundwater recharge areas in Lee County as it becomes available, and propose modifications to the Future Land Use Map or general county regulations necessary to protect or improve such areas.

The county staff, through the Evaluation and Appraisal Report, has fulfilled the requirements of this Policy. The proposed Airport Commerce land use designation on the subject property is consistent with this Objective.

POLICY 41.2.1:

Based on best available technical data, the county shall designate appropriate areas of the county as sources for future potable water supply and revise development regulations to preclude incompatible uses of this land.

Lee County has fulfilled the requirements of this Policy through two mechanisms. The Regional Water Supply study has identified areas suitable as sources for future water supply. The county's wellfield protection program set forth in Chapter 14, Article III of the Land Development Code provides for the protection of existing wellfields from incompatible land uses. The proposed Airport Commerce land use designation on the subject property is consistent with this Policy.

POLICY 41.2.2:

A new land use category, called the Density Reduction/Groundwater Resource category, shall be applied to protect the county's groundwater resources and principal recharge areas. Land use controls in the category shall be as described in Policy 1.4.3.

The county has applied the Density Reduction/Groundwater Resource category to parts of Lee County. In this amendment as well as other parts of the EAR, the county has attempted to carry out the intent of this policy in a specific application. The proposed Airport Commerce land use designation on the subject property is consistent with this Policy.

OBJECTIVE 41.3: POTABLE GROUNDWATER.

Base all future development and use of groundwater resources on determinations of the safe yield of the aquifer system(s) in order not to impair the native groundwater quality or create other environmental damage. Criteria for safe-yield determinations shall be established through groundwater supply and surface water management studies over the years 1989-1993.

This Objective, as the language states, is related to "determinations of the safe yield of the aquifer system(s)" Policies 41.3.1, Policy 41.3.2, Policy 41.3.3 and Policy 41.3.4 all relate to identify future wellfields and/or relocation site(s) for existing wellfields, instituting a program to identify point and non-point sources of groundwater pollutants, identifying the county's future water needs consistent with population projections, identifying and mapping the contamination potential of groundwater resources for those areas of Lee County not currently under public ownership and accelerating the county's current program of plugging non-valved, abandoned, or improperly-cased artesian wells.

however, the property owner, Lee County and the Airport Authority have recognized the need for additional acreage slated for airport-related growth and the growth of other compatible land uses. Industrial development is expected to be a main component of any development within the Airport Commerce designated subject property.

Residential Land Uses Reduced

No additional residential units are added to Lee County as a result of this proposed land use map amendment. In fact, the proposed reclassification of the subject property from Density Reduction Groundwater Resource to Airport Commerce actually decreases the number of units possible. Residential units are precluded from this land use category. With the change of the property to Airport Commerce, the property would be eligible for no residential units.

Urban Reserve Area

The reviewer has misunderstood Lee County's "Urban Reserve Area". The Urban Reserve Area is described in Policy 1.7.3 as an overlay which "indicates areas that are suitable for annexation into the adjoining municipality. Urban Reserve areas are initially established by interlocal agreement...". The presence or absence of this designation on the subject property is irrelevant to its suitability as an expansion of the Airport Commerce land use category.

Objection:

The revised policy expands the Airport Commerce designation to include parcels which are identified as Density Reduction Groundwater Recharge Areas subject to best environmental management practices. The revised policy would allow unsuitable land uses and would not ensure groundwater resources of the county are adequately protected. (Rules 9J-5.005, 9J-5.006(2), (3)(b) and (c), (4), and (5), and 9J-5.013(1) and (2)(b) and (c), F.A.C.)

Recommendation:

Provide adequate data and analysis to address the suitability of the area for designation as Airport Commerce, or alternatively delete the provision to expand the Airport Commerce district to include these parcels.

Appendix B
HENIGAR & RAY'S SUGGESTED BEST MANAGEMENT PRACTICES

AREA B - 1 du/acre with post development performance standards 1, 2, 4, 5, 6 and 7 below

AREA C - 1 du/acre with no post development standards beyond existing standards

The following are post-development performance standards which may be applied:

1. Site retention and percolation of the first three inches of the run-off generated in a 100 year storm. (The SFWMD is developing Best Management Practices for "Outstanding Natural Systems" that are located in the same general area as the DRGR in southeast Lee County. After the SFWMD research is concluded in 18-24 months, it may be appropriate to utilize retention/detention standards recommended in their study.) (See Appendix D for other standards.)
2. Underground storage of hazardous materials is not permitted. Above ground storage shall use Best Environmental Protection Management Practice design and operation standards (see Appendix C).
3. No storage of hazardous materials.
4. No septic systems at densities greater than 1 dwelling unit per net acre.
5. Sanitary sewer systems shall use BEMP structural design and operation standards for collection and treatment facilities that assure no leakage of effluent. Disposal methods shall be located and managed to assure proper treatment prior to reaching the ground water (see Appendix D).
6. Impervious surface ratio must not exceed 0.35 including roads and all other public facilities.

7. Current Potable Water Wellfield Protection standards will remain in place.
8. Applicable current Potable Water Wellfield Protection standards will be expanded to encompass the entire area.

D. Scenario 4 - Population Constant

Scenario 4 allocates the same geographical areas (A, B, & C) as Scenario 3 (see Plate V-1). However, Scenario 4 assigns density by allowing the redistribution of overall existing planned population accommodation potential through a Transfer of Development Rights (TDR) program. Area A which is least desirable for urban/suburban development and should require the greatest effort in regulatory ground water protection will only be allowed to develop at a density/intensity of 1 du/40 acres. Area A will, however, continue to have a 1 du/10 acres available for TDR. Area B will be allowed to develop at 1 du/acre but must acquire from a sending zone the necessary units to increase density from 1 du/10 acres to 1 du/acre. Area B will also require BEMP's specified in Scenario 3 when development exceeds 10 du/acres and for all non-residential development. Area C will be allowed to develop at 1 du/acre but will also be required to acquire increased development density of up to 1 du/acre from an assigned density of 1 du/5 acres. In Area C, this increase in density (from 1 du/5 acres to 1 du/acre) can be accomplished without any further BEMP standards than presently exist (ie: wellfield protection standards). The remainder of the undeveloped, unplatted County would be allowed to transfer out (sending zone) up to 25% of its development rights.

Sending zones are land use areas designated as having a surplus of development rights (density/intensity assigned exceeds allowable development density/intensity right) or areas where it is anticipated that development rights may not be fully used and, therefore, available for transfer. Receiving zones are land use areas designated as having assigned density/intensity rights that are less than the potential development density/intensity use if certain performance standards were applied to the development design and management.

Appendix C
SOILS TABLE

ORC Response
Airport Commerce
10/21/94

EXHIBIT V.2
SOILS DESCRIPTION AND INTERPRETATION
(SOURCE: SOIL SURVEY OF LEE COUNTY, FLORIDA, SCS, 1984)

SOIL NAME	MAP #	SOIL DESCRIPTION	DEPTH TO ROCK (IN)	SEASONAL HIGH WATER TABLE		PERMEABILITY RATE (IN/HOUR)	LIMITATION FOR LOW BUILDINGS	LIMITATION FOR POND EMBANKMENTS
				DEPTH (FT)	DURATION (MONTHS)			
Hallandale Fine Sand	6	Nearly level, poorly drained on low, broad flatwood area; slopes at 0-2%; gray fine sand	7-20	1-1.5	12 (Jan-Dec)	2.0-20.0	Severe	Severe
EauGallie Sand	9	Nearly level, poorly drained in flatwood areas; slopes at 0-2%; gray sand	>60	0-1.0	5 (Jun-Oct)	0.6-20.0	Severe	Severe
Pompano Fine Sand	10	Nearly level, poorly drained on sloughs; slopes are smooth to concave at 0-1%; fine sand	>60	0-1.0	6 (Jun-Nov)	6.0-20.0	Severe	Severe
Myakka Fine Sand	11	Nearly level, poorly drained in flatwood depressions; slopes at 0-2%; gray fine sand	>60	0-1.0	6 (Jun-Nov)	0.6-20.0	Severe	Severe
Felda Fine Sand	12	Nearly level, poorly drained on broad sloughs; slopes are smooth to concave at 0-2%; fine sand	>60	0-1.0	9 (Jul-Mar)	0.6-20.0	Severe	Severe
Boca Fine Sand	13	Nearly level, poorly drained on flatwoods; slopes are smooth at 0-2%; fine sand	24-40	0-1.0	9 (Jun-Feb)	0.6-20.0	Severe	Severe
Valkaria Fine Sand	14	Nearly level, poorly drained on sloughs; slopes are smooth to concave at 0-1%; fine sand	>60	0-1.0	4 (Jun-Sep)	6.0-20.0	Severe	Severe
Terra Cela Muck	20	Nearly level, very poorly drained in broad areas of freshwater marsh; slopes at 0-1%; black muck	>60	+1-1.0	12 (Jan-Dec)	6.0-20.0	Severe	Severe
Pineda Fine Sand	26	Nearly level, poorly drained in depressions; slopes are concave at <1%; fine sand	>60	0-1.0	6 (Jun-Nov)	<0.2-20.0	Severe	Severe
Pompano Fine Sand, Depressional	27	Nearly level, poorly drained in depressions; slopes are concave at <1%; fine sand	>60	+2.0-1.0	9 (Jun-Feb)	6.0-20.0	Severe	Severe

EXHIBIT V.2
SOILS DESCRIPTION AND INTERPRETATION
(SOURCE: SOIL SURVEY OF LEE COUNTY, FLORIDA, SCS, 1984)

SOIL NAME	MAP #	SOIL DESCRIPTION	DEPTH TO ROCK (IN)	SEASONAL HIGH WATER TABLE		PERMEABILITY RATE (IN/HOUR)	LIMITATION FOR LOW BUILDINGS	LIMITATION FOR POND EMBANKMENTS
				DEPTH (FT)	DURATION (MONTHS)			
Immokalee Sand	28	Nearly level, poorly drained in flatwood areas; slopes are smooth to convex at 0-2%; sand	>60	0-1.0	6 (Jun-Nov)	0.1-20.0	Severe	Severe
Oldsmar Sand	33	Nearly level, poorly drained on low, broad flatwood areas; slopes are smooth to slightly convex at 0-2%; fine sand to sand	>60	0-1.0	9 (Jun-Feb)	<0.2-20.0	Severe	Severe
Malabar Fine Sand	34	Nearly level, poorly drained on sloughs; slopes are smooth to concave at 0-1%; fine sand	>60	0-1.0	6 (Jun-Nov)	<0.2-20.0	Severe	Severe
Wabasso Sand	35	Nearly level, poorly drained in flatwood areas; slopes at 0-1%; gray sand	>60	0-1.0	5 (Jun-Oct)	<0.2-20	Severe	Severe
Anclote Sand, Depressional	40	Nearly level; poorly drained in isolated depressions; slopes are smooth to concave at <1%; black sand	>60	+2.0-0	10 (Jun-Nov)	6.0-20.0	Severe	Severe
Smyrna Fine Sand	43	Nearly level, poorly drained on broad flatwoods; slopes at 0-2%; light gray fine sand	>60	0-1.0	4 (Jul-Oct)	0.6-20.0	Severe	Severe
Malabar Fine Sand, Depressional	44	Nearly level, poorly drained in flatwoods, sloughs & depressions; slopes at 0-1%; gray fine sand	>60	+2-1.0	6 (Jun-Nov)	<0.2-20.0	Severe	Severe
Copeland Sandy Loam, Depressional	45	Very poorly drained in depressions; slopes are smooth to concave at 0-1%; dark gray sandy loam	20-50	+2-1.0	10 (Jul-Apr)	0.6-20.0	Severe	Severe
Felda Fine Sand, Depressional	49	Nearly level, poorly drained in depressions; slopes are concave at <1%; fine sand	>60	+2-1.0	7 (Jun-Dec)	0.6-20.0	Severe	Severe
Floridana Sand, Depressional	51	Nearly level, poorly drained in depressions; slopes are concave at <1%; fine sand	>60	+2.0-1.0	9 (Jun-Feb)	<0.2-20	Severe	Severe

EXHIBIT V.2
SOILS DESCRIPTION AND INTERPRETATION
(SOURCE: SOIL SURVEY OF LEE COUNTY, FLORIDA, SCS, 1984)

SOIL NAME	MAP #	SOIL DESCRIPTION	DEPTH TO ROCK (IN)	SEASONAL HIGH WATER TABLE		PERMEABIL- ITY RATE (IN/HOUR)	LIMITATION FOR LOW BUILDINGS	LIMITATION FOR POND EMBANK- MENTS
				DEPTH (FT)	DURATION (MONTHS)			
Myakka Fine Sand, Depressional	53	Nearly level, poorly drained in depressions; slopes are concave at <1%; fine sand	>60	+2.0-1.0	8 (Jun-Feb)	0.6-20.0	Severe	Severe
Matlacha Gravelly Fine Sand	69	Nearly level, somewhat poorly drained formed by filling and earth moving operations; slopes are smooth to slightly convex at 0-2%; mixed gravelly fine sand and sandy mineral material	>60	2.0-3.0	5 (Jun-Oct)	2.0-20.0	Severe	Severe
Pineda Fine Sand, Depressional	73	Nearly level, poorly drained in depressions; slopes are concave at <1%; fine sand	>60	+2.0-1.0	7 (Jun-Dec)	<0.2-20.0	Severe	Severe

Short and Long Term Impacts

No Expansion Alternative

The soils that underlie the existing Airport facilities have been stabilized and do not present problems to the integrity of the structures or pavement.

Retaining the Airport in its present configuration would not have any impact to the land-bearing capacity or stability of the soils underlying the Airport.



Lee County Board of County Commissioners
Department of Community Development
Division of Planning
Post Office Box 398
Fort Myers, FL 33902-0398
Telephone: (239) 533-8585
FAX: (239) 485-8319

APPLICATION FOR A COMPREHENSIVE PLAN AMENDMENT

(To be completed at time of intake)

DATE REC'D 1/11/10

REC'D BY: Sue

APPLICATION FEE 2500.00

TIDEMARK NO: CPA2010-00001

THE FOLLOWING VERIFIED:

Zoning AG-2 ☐

Commissioner District ☒ 5

Designation on FLUM ☐ Tradeport

(To be completed by Planning Staff)

Plan Amendment Cycle: ☐ Normal ☐ Small Scale ☐ DRI ☐ Emergency

Request No: _____

APPLICANT PLEASE NOTE:

Answer all questions completely and accurately. Please print or type responses. If additional space is needed, number and attach additional sheets. The total number of sheets in your application is: _____

Submit **6** copies of the complete application and amendment support documentation, including maps, to the Lee County Division of Planning. Up to 90 additional copies will be required for Local Planning Agency, Board of County Commissioners hearings and the Department of Community Affairs' packages. Staff will notify the applicant prior to each hearing or mail out.

I, the undersigned owner or authorized representative, hereby submit this application and the attached amendment support documentation. The information and documents provided are complete and accurate to the best of my knowledge.

DATE 1/11/10

SIGNATURE OF OWNER OR AUTHORIZED REPRESENTATIVE [Signature]

I. APPLICANT/AGENT/OWNER INFORMATION

Buffalo-Casselberry Business Trust; Ronald Benderson and David H. Baldauf as Trustees under a Trust Agreement dated September 22, 1993, known as the Randall Benderson 1993-1 Trust; Blend-All Hotel Development, Inc.; Ronald Benderson and David H. Baldauf as Trustees under a Trust Agreement dated April 4, 1968; Post Falls Management Associates, LLC; Ronald Benderson, Randall Benderson and David H. Baldauf as Trustees under a Trust Agreement dated October 14, 1985, known as the Benderson 85-1 Trust; BAHF SUB, LLC; NEC ABH, LLC; BUFFALO-FPA, LLC; MSF Austin-I, LLC; MSF Austin-L, LLC; MSF Round Rock-I, LLC; ALICO-I, LLC; ALICO-II, LLC; ALICO-III, LLC; ALICO-IV, LLC; ALICO-V, LLC; ALICO-VI, LLC; ALICO-VII, LLC; ALICO-VIII, LLC; ALICO-IX, LLC

APPLICANT

C/O The Benderson Development Corporation, LLC, 8441 Cooper Creek Blvd.

ADDRESS

University Park	FL	34201-2006
CITY	STATE	ZIP
941.359.8303		941.359.1836
TELEPHONE NUMBER		FAX NUMBER

D. Wayne Arnold, AICP

AGENT*

Q. Grady Minor and Associates, P.A., 3800 Via Del Rey

ADDRESS

Bonita Springs	FL	34134
CITY	STATE	ZIP
239.947.1144		239.947.0375
TELEPHONE NUMBER		FAX NUMBER

Neale Montgomery

AGENT*

Pavese Law Firm, 1833 Hendry Street

ADDRESS

Fort Myers	FL	33901
CITY	STATE	ZIP
239.336.6235		239.332.2243
TELEPHONE NUMBER		FAX NUMBER

Please see attached Exhibit I – Owners of Record

OWNER(S) OF RECORD

C/O The Benderson Development Corporation, LLC, 8441 Cooper Creek Blvd.

ADDRESS

University Park	FL	34201-2006
CITY	STATE	ZIP
941.359.8303		941.359.1836
TELEPHONE NUMBER		FAX NUMBER

Name, address and qualification of additional planners, architects, engineers, environmental consultants, and other professionals providing information contained in this application. **Please refer to Exhibit Ic.**

* This will be the person contacted for all business relative to the application.

II. REQUESTED CHANGE (Please see Item 1 for Fee Schedule)

A. TYPE: (Check appropriate type)

☒ Text Amendment

☐ Future Land Use Map Series Amendment
(Maps 1 thru 22)
List Number(s) of Map(s) to be amended

1. Future Land Use Map amendments require the submittal of a complete list, map, and two sets of mailing labels of all property owners and their mailing addresses, for all property within 500 feet of the perimeter of the subject parcel. The list and mailing labels may be obtained from the Property Appraisers office. The map must reference by number or other symbol the names of the surrounding property owners list. The applicant is responsible for the accuracy of the list and map.

At least 15 days before the Local Planning Agency (LPA) hearing, the applicant will be responsible for posting signs on the subject property, supplied by the Division of Planning, indicating the action requested, the date of the LPA hearing, and the case number. An affidavit of compliance with the posting requirements must be submitted to the Division of Planning prior to the LPA hearing. The signs must be maintained until after the final Board adoption hearing when a final decision is rendered.

B. SUMMARY OF REQUEST (Brief explanation):

The applicant is submitting this privately initiated Lee Plan amendment in conjunction with a Development of Regional Impact (DRI) application. The DRI encompasses approximately 726+/- acres of property located at the northeast quadrant of the intersection of Ben Hill Griffin Parkway and Alico Road. The property which is the subject of the Lee Plan amendment is approximately 103+/- and is depicted on the attached general location exhibit. The amendment proposes to modify the Tradeport Land Use category, Policy 1.2.2 by establishing criteria under which community and regional retail commercial development may occur in conjunction with industrial, office and research and development if developed as a single project which provides for economic development opportunities. The regional and community commercial uses would be in addition to the corner-store commercial land uses currently permitted in this land use category.

III. PROPERTY SIZE AND LOCATION OF AFFECTED PROPERTY
(for amendments affecting development potential of property)

A. Property Location:

1. Site Address: Undetermined, Northeast quadrant of Alico Road and Treeline Ave South
2. STRAP(s): 01-46-25-00-00001.0020, 02-46-25-00-00001.0050, 02-46-25-00-00001.005A and 02-46-25-00-00001.0080

B. Property Information

Total Acreage of Property: 727±

Total Acreage included in Request: 103±

Total Uplands: 84.61±

Total Wetlands: 22.39±

Current Zoning: AG-2

Current Future Land Use Designation: Tradeport and Wetlands

Area of each Existing Future Land Use Category:

Existing Land Use: Cattle Grazing

C. State if the subject property is located in one of the following areas and if so how does the proposed change effect the area:

Lehigh Acres Commercial Overlay: _____

Airport Noise Zone 2 or 3: _____

Acquisition Area: _____

Joint Planning Agreement Area (adjoining other jurisdictional lands): _____

Community Redevelopment Area: _____

D. Proposed change for the subject property: N/A, Text change only

E. Potential development of the subject property:

1. Calculation of maximum allowable development under existing FLUM:

Residential Units/Density N/A

Commercial intensity 1,100,000 Square feet of office and retail

Industrial intensity 3,897,000 Square feet

2. Calculation of maximum allowable development under proposed FLUM:

Residential Units/Density

Commercial intensity 700,000 Square feet retail

Industrial intensity 3,897,000 Square feet

IV. AMENDMENT SUPPORT DOCUMENTATION

At a minimum, the application shall include the following support data and analysis. These items are based on comprehensive plan amendment submittal requirements of the State of Florida, Department of Community Affairs, and policies contained in the Lee County Comprehensive Plan. Support documentation provided by the applicant will be used by staff as a basis for evaluating this request. To assist in the preparation of amendment packets, the applicant is encouraged to provide all data and analysis electronically. (Please contact the Division of Planning for currently accepted formats)

A. General Information and Maps

NOTE: For each map submitted, the applicant will be required to provide a reduced map (8.5" x 11") for inclusion in public hearing packets.

The following pertains to all proposed amendments that will affect the development potential of properties (unless otherwise specified).

1. Provide any proposed text changes. **Please refer to Exhibit IV.A.1**
2. Provide a current Future Land Use Map at an appropriate scale showing the boundaries of the subject property, surrounding street network, surrounding designated future land uses, and natural resources. **Please refer to Exhibit IV.A.2**
3. Provide a proposed Future Land Use Map at an appropriate scale showing the boundaries of the subject property, surrounding street network, surrounding designated future land uses, and natural resources. **Please refer to Exhibit IV.A.3**
4. Map and describe existing land uses (not designations) of the subject property and surrounding properties. Description should discuss consistency of current uses with the proposed changes.

The subject property is presently utilized for cattle grazing. Lands immediately adjacent to the north and east are under the same ownership as the subject property and are also utilized for cattle grazing. The lands to the north and the east are the subject of a pending DRI and the property in question is being included at the encouragement of the County and the SWFRPC. Property to the north adjacent to Ben Hill Griffin Parkway is a

native vegetation preservation area. Immediately south of the site is Alico Road and unimproved vacant property. West of the site is Ben Hill Griffin Parkway and property under development for a variety of commercial land uses. Southwest of the site is the Gulf Coast Town Center commercial project. **Please refer to Exhibit IV.A.4, 5 and 8**

5. Map and describe existing zoning of the subject property and surrounding properties.

The subject site is currently zoned AG-2. Lands immediately to the north and east are also zoned AG-2; however, they are within the pending DRI application boundaries for the Florida Gulf Coast Technology and Research Park DRI/IPD. The property to the north beyond the boundaries of the property under the applicant's ownership is Southwest Florida International Airport AOPD, the AOPD provides for public, office, retail, hotel and industrial uses. The land located to the northeast is the Premier Airport Park IPD property which is zoned for industrial, flex, office, and retail. The property to the northwest adjacent to Ben Hill Griffin Parkway is zoned MPD (Airport Technology). Property south of Alico Road is zoned MPD (Miromar Lakes). Property west of Ben Hill Griffin is zoned MPD (Jetway Tradeport) Property southwest of the site is zoned MPD (Gulf Coast Town Center). **Please refer to Exhibit IV.A.4, 5 and 8**

6. The certified legal description(s) and certified sketch of the description for the property subject to the requested change. A metes and bounds legal description must be submitted specifically describing the entire perimeter boundary of the property with accurate bearings and distances for every line. The sketch must be tied to the state plane coordinate system for the Florida West Zone (North America Datum of 1983/1990 Adjustment) with two coordinates, one coordinate being the point of beginning and the other an opposing corner. If the subject property contains wetlands or the proposed amendment includes more than one land use category a metes and bounds legal description, as described above, must be submitted in addition to the perimeter boundary of the property for each wetland or future land use category. **Please refer to Exhibit IV.A.6**
7. A copy of the deed(s) for the property subject to the requested change. **Please refer to Exhibit IV.A.7**
8. An aerial map showing the subject property and surrounding properties. **Please refer to Exhibit IV.A.4, 5 and 8**
9. If applicant is not the owner, a letter from the owner of the property authorizing the applicant to represent the owner.

B. Public Facilities Impacts

NOTE: The applicant must calculate public facilities impacts based on a maximum development scenario (see Part II.H.).

1. Traffic Circulation Analysis

The analysis is intended to determine the effect of the land use change on the Financially Feasible Transportation Plan/Map 3A (20-year horizon) and on the Capital Improvements Element (5-year horizon). Toward that end, an applicant must submit the following information: **Please refer to Exhibit IV.A.1**

Long Range – 20-year Horizon:

- a. Working with Planning Division staff, identify the traffic analysis zone (TAZ) or zones that the subject property is in and the socio-economic data forecasts for that zone or zones;
- b. Determine whether the requested change requires a modification to the socio-economic data forecasts for the host zone or zones. The land uses for the proposed change should be expressed in the same format as the socio-economic forecasts (number of units by type/number of employees by type/etc.);
- c. If no modification of the forecasts is required, then no further analysis for the long range horizon is necessary. If modification is required, make the change and provide to Planning Division staff, for forwarding to DOT staff. DOT staff will rerun the FSUTMS model on the current adopted Financially Feasible Plan network and determine whether network modifications are necessary, based on a review of projected roadway conditions within a 3-mile radius of the site;
- d. If no modifications to the network are required, then no further analysis for the long range horizon is necessary. If modifications are necessary, DOT staff will determine the scope and cost of those modifications and the effect on the financial feasibility of the plan;
- e. An inability to accommodate the necessary modifications within the financially feasible limits of the plan will be a basis for denial of the requested land use change;
- f. If the proposal is based on a specific development plan, then the site plan should indicate how facilities from the current adopted Financially Feasible Plan and/or the Official Trafficways Map will be accommodated.

Short Range – 5-year CIP horizon:

- a. Besides the 20-year analysis, for those plan amendment proposals that include a specific and immediated development plan, identify the existing roadways serving the site and within a 3-mile radius (indicate laneage, functional classification, current LOS, and LOS standard);
- b. Identify the major road improvements within the 3-mile study area funded through the construction phase in adopted CIP's (County or Cities) and the State's adopted Five-Year Work Program;
Projected 2030 LOS under proposed designation (calculate anticipated number of trips and distribution on roadway network, and identify resulting changes to the projected LOS);
- c. For the five-year horizon, identify the projected roadway conditions (volumes and levels of service) on the roads within the 3-mile study area

with the programmed improvements in place, with and without the proposed development project. A methodology meeting with DOT staff prior to submittal is required to reach agreement on the projection methodology;

- d. Identify the additional improvements needed on the network beyond those programmed in the five-year horizon due to the development proposal.
2. Provide an existing and future conditions analysis for (see Policy 95.1.3):
- a. Sanitary Sewer **Please refer to Exhibit IV.B.2a**
 - b. Potable Water **Please refer to Exhibit IV.B.2b**
 - c. Surface Water/Drainage Basins **Please refer to Exhibit IV.B.2c**
 - d. Parks, Recreation, and Open Space **Please refer to Exhibit IV.B.2d and e**
 - e. Public Schools. **Please refer to Exhibit IV.B.2d and e**

Analysis should include (but is not limited to) the following (see the Lee County Concurrency Management Report):

- Franchise Area, Basin, or District in which the property is located;
- Current LOS, and LOS standard of facilities serving the site;
- Projected 2030 LOS under existing designation;
- Projected 2030 LOS under proposed designation;
- Existing infrastructure, if any, in the immediate area with the potential to serve the subject property.
- Improvements/expansions currently programmed in 5 year CIP, 6-10 year CIP, and long range improvements; and
- Anticipated revisions to the Community Facilities and Services Element and/or Capital Improvements Element (state if these revisions are included in this amendment).
- Provide a letter of service availability from the appropriate utility for sanitary sewer and potable water.

In addition to the above analysis for Potable Water:

- Determine the availability of water supply within the franchise area using the current water use allocation (Consumptive Use Permit) based on the annual average daily withdrawal rate.
- Include the current demand and the projected demand under the existing designation, and the projected demand under the proposed designation.
- Include the availability of treatment facilities and transmission lines for reclaimed water for irrigation.
- Include any other water conservation measures that will be applied to the site (see Goal 54).

3. Provide a letter from the appropriate agency determining the adequacy/provision of existing/proposed support facilities, including:
 - a. Fire protection with adequate response times;
 - b. Emergency medical service (EMS) provisions;
 - c. Law enforcement;

- d. Solid Waste;
- e. Mass Transit; and
- f. Schools.

In reference to above, the applicant should supply the responding agency with the information from Section's II and III for their evaluation. This application should include the applicant's correspondence to the responding agency.

Please refer to Exhibit IV.B.3

C. Environmental Impacts - Please refer to Exhibit IV.C and D

Provide an overall analysis of the character of the subject property and surrounding properties, and assess the site's suitability for the proposed use upon the following:

1. A map of the Plant Communities as defined by the Florida Land Use Cover and Classification system (FLUCCS).
2. A map and description of the soils found on the property (identify the source of the information).
3. A topographic map depicting the property boundaries and 100-year flood prone areas indicated (as identified by FEMA).
4. A map delineating the property boundaries on the Flood Insurance Rate Map effective August 2008.
5. A map delineating wetlands, aquifer recharge areas, and rare & unique uplands.
6. A table of plant communities by FLUCCS with the potential to contain species (plant and animal) listed by federal, state or local agencies as endangered, threatened or species of special concern. The table must include the listed species by FLUCCS and the species status (same as FLUCCS map).

D. Impacts on Historic Resources - Please refer to Exhibit IV.C and D

List all historic resources (including structure, districts, and/or archeologically sensitive areas) and provide an analysis of the proposed change's impact on these resources. The following should be included with the analysis:

1. A map of any historic districts and/or sites, listed on the Florida Master Site File, which are located on the subject property or adjacent properties.
2. A map showing the subject property location on the archeological sensitivity map for Lee County.

E. Internal Consistency with the Lee Plan - **Please refer to Exhibit IV.E**

1. Discuss how the proposal affects established Lee County population projections, Table 1(b) (Planning Community Year 2030 Allocations), and the total population capacity of the Lee Plan Future Land Use Map.
2. List all goals and objectives of the Lee Plan that are affected by the proposed amendment. This analysis should include an evaluation of all relevant policies under each goal and objective.
3. Describe how the proposal affects adjacent local governments and their comprehensive plans.
4. List State Policy Plan and Regional Policy Plan goals and policies which are relevant to this plan amendment. **Please refer to Exhibit IV.E.4**

F. Additional Requirements for Specific Future Land Use Amendments

1. Requests involving Industrial and/or categories targeted by the Lee Plan as employment centers (to or from) - **Please refer to Exhibit IV.F.1**
 - a. State whether the site is accessible to arterial roadways, rail lines, and cargo airport terminals,
 - b. Provide data and analysis required by Policy 2.4.4,
 - c. The affect of the proposed change on county's industrial employment goal specifically policy 7.1.4.
2. Requests moving lands from a Non-Urban Area to a Future Urban Area – **N/A**
 - a. Demonstrate why the proposed change does not constitute Urban Sprawl. Indicators of sprawl may include, but are not limited to: low-intensity, low-density, or single-use development; 'leap-frog' type development; radial, strip, isolated or ribbon pattern type development; a failure to protect or conserve natural resources or agricultural land; limited accessibility; the loss of large amounts of functional open space; and the installation of costly and duplicative infrastructure when opportunities for infill and redevelopment exist.
3. Requests involving lands in critical areas for future water supply must be evaluated based on policy 2.4.2. – **N/A**
4. Requests moving lands from Density Reduction/Groundwater Resource must fully address Policy 2.4.3 of the Lee Plan Future Land Use Element. – **N/A**

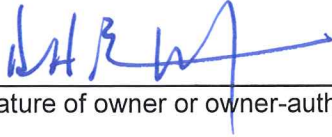
G. Justify the proposed amendment based upon sound planning principles. Be sure to support all conclusions made in this justification with adequate data and analysis. – **Please refer to Exhibit IV.F.1**

Item 1: Fee Schedule

Map Amendment Flat Fee	\$2,000.00 each
Map Amendment > 20 Acres	\$2,000.00 and \$20.00 per 10 acres
Small Scale Amendment (10 acres or less)	\$1,500.00 each
Text Amendment Flat Fee	\$2,500.00 each

AFFIDAVIT

We, Buffalo-Casselberry Business Trust; Ronald Benderson and David H. Baldauf as Trustees under a Trust Agreement dated September 22, 1993, known as the Randall Benderson 1993-1 Trust; Blend-All Hotel Development, Inc.; Ronald Benderson and David H. Baldauf as Trustees under a Trust Agreement dated April 4, 1968; Post Falls Management Associates, LLC; Ronald Benderson, Randall Benderson and David H. Baldauf as Trustees under a Trust Agreement dated October 14, 1985, known as the Benderson 85-1 Trust; BAHD SUB, LLC; NEC ABH, LLC; BUFFALO-FPA, LLC; MSF Austin-I, LLC; MSF Austin-L, LLC; MSF Round Rock-I, LLC; ALICO-I, LLC; ALICO-II, LLC; ALICO-III, LLC; ALICO-IV, LLC; ALICO-V, LLC; ALICO-VI, LLC; ALICO-VII, LLC; ALICO-VIII, LLC; ALICO-IX, LLC, certify that we are the owner or authorized representative of the property described herein, and that all answers to the questions in this application and any sketches, data, or other supplementary matter attached to and made a part of this application, are honest and true to the best of my knowledge and belief. I also authorize the staff of Lee County Community Development to enter upon the property during normal working hours for the purpose of investigating and evaluating the request made through this application.



Signature of owner or owner-authorized agent

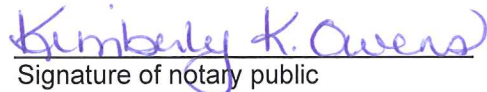
12-24-09
Date

DAVID H. BALDAUF, TRUSTEE / MANAGER
Typed or printed name

NEW YORK
STATE OF FLORIDA)
COUNTY OF ~~LEE~~)
ERIE

The foregoing instrument was certified and subscribed before me this 24th day of December 2009,
by DAVID H. BALDAUF, who is personally known to me or who has produced
_____ as identification.

KIMBERLY K. OWENS
Notary Public, State of New York
Registration No. 01OW6176968
Qualified in Erie County
My Commission Expires November 5, 2011
(SEAL)



Signature of notary public

Kimberly K. Owens
Printed name of notary public

**COMPREHENSIVE PLAN AMENDMENT APPLICATION
AUTHORIZATION**

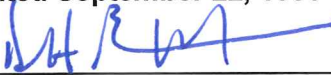
The undersigned, on behalf of, **Buffalo-Casselberry Business Trust; Ronald Benderson and David H. Baldauf as Trustees under a Trust Agreement dated September 22, 1993, known as the Randall Benderson 1993-1 Trust; Blend-All Hotel Development, Inc.; Ronald Benderson and David H. Baldauf as Trustees under a Trust Agreement dated April 4, 1968; Post Falls Management Associates, LLC; Ronald Benderson, Randall Benderson and David H. Baldauf as Trustees under a Trust Agreement dated October 14, 1985, known as the Benderson 85-1 Trust; BAHD SUB, LLC; NEC ABH, LLC; BUFFALO-FPA, LLC; MSF Austin-I, LLC; MSF Austin-L, LLC; MSF Round Rock-I, LLC; ALICO-I, LLC; ALICO-II, LLC; ALICO-III, LLC; ALICO-IV, LLC; ALICO-V, LLC; ALICO-VI, LLC; ALICO-VII, LLC; ALICO-VIII, LLC; ALICO-IX, LLC** hereby swear or affirm under oath, that we are the owners or authorized representative of the owner(s) of the property and that; we do hereby authorize Q. Grady Minor and Associates, P.A. and Pavese Law Firm and the team members listed on Attachment "A" to represent us and file a Comprehensive Amendment Application. The subject property is known as STRAP #'s 01-46-25-00-00001.0020, 02-46-25-00-00001.0050, 02-46-25-00-00001.005A and 02-46-25-00-00001.0080.

12-24-09
(Date)

Buffalo-Casselberry Business Trust,
a Delaware Business Trust
By: 

David H. Baldauf, Managing Trustee
Signature of Owner or Authorized Agent

12-24-09
(Date)

The Randall Benderson 1993-1 Trust
Dated September 22, 1993
By: 

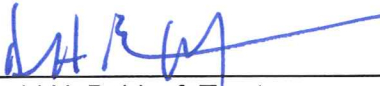
David H. Baldauf, Trustee
Signature of Owner or Authorized Agent

12-24-09
(Date)

Blend-All Hotel Development, Inc.,
a New York Corporation
By: 

David H. Baldauf, Vice President
Signature of Owner or Authorized Agent

12-24-09
(Date)

Ronald Benderson and
David H. Baldauf, as Trustee under
Trust Agreement dated April 4, 1968
By: 


David H. Baldauf, Trustee
Signature of Owner or Authorized Agent



Post Falls Management Associates, LLC
a New York Limited Liability Company

12-24-09
(Date)


By:


David H. Baldauf, Manager
Signature of Owner or Authorized Agent

The Benderson 85-1 Trust, Under Trust Agreement
Dated October 14, 1985

12-24-09
(Date)


By:


David H. Baldauf, Trustee
Signature of Owner or Authorized Agent

BAHD SUB, LLC
A Florida Corporation

12-24-09
(Date)


By:


David H. Baldauf, Manager
Signature of Owner or Authorized Agent

NEC ABH, LLC
a Florida Limited Liability Company

12-24-09
(Date)


By:


David H. Baldauf, Manager
Signature of Owner or Authorized Agent

BUFFALO-FPA, LLC
a Florida Limited Liability Company

12-24-09
(Date)


By:


David H. Baldauf, Manager
Signature of Owner or Authorized Agent

MSF Austin-I, LLC
a Florida Limited Liability Company

12-24-09
(Date)

By:


David H. Baldauf, Manager
Signature of Owner or Authorized Agent

MSF Austin-L, LLC
a Florida Limited Liability Company

12-24-09
(Date)

By: 
David H. Baldauf, Manager
Signature of Owner or Authorized Agent

MSF Round Rock-I, LLC
a Florida Limited Liability Company

12-24-09
(Date)

By: 
David H. Baldauf, Manager
Signature of Owner or Authorized Agent


ALICO-I, LLC;
a Florida Limited Liability Company

12-24-09
(Date)

By: 
David H. Baldauf, Manager
Signature of Owner or Authorized Agent


ALICO-II, LLC;
a Florida Limited Liability Company

12-24-09
(Date)

By: 
David H. Baldauf, Manager
Signature of Owner or Authorized Agent


ALICO-III, LLC;
a Florida Limited Liability Company

12-24-09
(Date)

By: 
David H. Baldauf, Manager
Signature of Owner or Authorized Agent

ALICO-IV, LLC;
a Florida Limited Liability Company

12-24-09
(Date)

By: 
David H. Baldauf, Manager
Signature of Owner or Authorized Agent



ALICO-V, LLC;
a Florida Limited Liability Company

12-24-09
(Date)

By: 
David H. Baldauf, Manager
Signature of Owner or Authorized Agent

ALICO-VI, LLC;
a Florida Limited Liability Company

12-24-09
(Date)

By: 
David H. Baldauf, Manager
Signature of Owner or Authorized Agent

ALICO-VII, LLC;
a Florida Limited Liability Company

12-24-09
(Date)

By: 
David H. Baldauf, Manager
Signature of Owner or Authorized Agent

ALICO-VIII, LLC;
a Florida Limited Liability Company

12-24-09
(Date)

By: 
David H. Baldauf, Manager
Signature of Owner or Authorized Agent

ALICO-IX, LLC;
a Florida Limited Liability Company

12-24-09
(Date)

By: 
David H. Baldauf, Manager
Signature of Owner or Authorized Agent

08

STATE OF New York

COUNTY OF ERIE

Before me the undersigned authority on the 24th day of December, 2009, personally appeared David H. Baldauf, who signed the foregoing Authorization on behalf of Buffalo-Casselberry Business Trust; Ronald Benderson and David H. Baldauf as Trustees under a Trust Agreement dated September 22, 1993, known as the Randall Benderson 1993-1 Trust; Blend-All Hotel Development, Inc.; Ronald Benderson and David H. Baldauf as Trustees under a Trust Agreement dated April 4, 1968; Post Falls Management Associates, LLC; Ronald Benderson, Randall Benderson and David H. Baldauf as Trustees under a Trust Agreement dated October 14, 1985, known as the Benderson 85-1 Trust; BAHD SUB, LLC; NEC ABH, LLC; BUFFALO-FPA, LLC; MSF Austin-I, LLC; MSF Austin-L, LLC; MSF Round Rock-I, LLC; ALICO-I, LLC; ALICO-II, LLC; ALICO-III, LLC; ALICO-IV, LLC; ALICO-V, LLC; ALICO-VI, LLC; ALICO-VII, LLC; ALICO-VIII, LLC; ALICO-IX, LLC. He is personally known to me.

Kimberly K. Owens
Name typed, printed or stamped

Kimberly K. Owens
Notary Public – State of ~~Florida~~ New York
My Commission Expires:

KIMBERLY K. OWENS
Notary Public, State of New York
Registration No. 01OW6176968
Qualified in Erie County
My Commission Expires November 5, 2011

Exhibit I
Applicant / Owner Information

Buffalo-Casselberry Business Trust, a Delaware business trust **2.8113%**

Ronald Benderson and David H. Baldauf as Trustees under a Trust Agreement dated September 22, 1993, known as the Randall Benderson 1993-1 Trust **23.3698181%**

Blend-All Hotel Development, Inc., a New York corporation **1.127%**

Ronald Benderson and David H. Baldauf as Trustees under a Trust Agreement dated April 4, 1968 **.11%**

Post Falls Management Associates, LLC, a New York limited liability company **.23%**

Ronald Benderson, Randall Benderson and David H. Baldauf as Trustees under a Trust Agreement dated October 14, 1985, known as the Benderson 85-1 Trust **.038%**

BAHD SUB, LLC, a Florida limited liability company **2.1%**

NEC ABH, LLC, a Florida limited liability company **2.6301819%**

BUFFALO-FPA, LLC, a Florida limited liability company **3.7%**

MSF Austin-I, LLC, a Florida limited liability company **8.5%**

MSF Austin-L, LLC, a Florida limited liability company **16.75%**

MSF Round Rock-I, LLC, a Florida limited liability company **4.1667%**

ALICO-I, LLC, a Florida limited liability company **6.3803%**

ALICO-II, LLC, a Florida limited liability company **6.3889%**

ALICO-III, LLC, a Florida limited liability company **1.1985%**

ALICO-IV, LLC, a Florida limited liability company **2.992%**

ALICO-V, LLC, a Florida limited liability company **4.4614%**

ALICO-VI, LLC, a Florida limited liability company **1.1683%**

ALICO-VII, LLC, a Florida limited liability company **1.602%**

ALICO-VIII, LLC, a Florida limited liability company **1.7343%**

ALICO-IX, LLC, a Florida limited liability company **8.5413%**

Exhibit I
Owner / Agent / Consultant Information

Owner Agent:

William L. Murray, P.E.
Director of Engineering - Florida
Benderson Development Company, LLC
8441 Cooper Creek Boulevard
University Park, FL 34201
Phone: 941-359-8303
Fax: 941-359-1836
E-mail: billmurray@benderson.com

Project Attorney:

Neale Montgomery
Pavese, Haverfield, Dalton, Harrison & Jensen, LLP
1833 Hendry Street
Fort Myers, FL 33901
Tel: 239-336-6235
Fax: 239-332-2243
Email: NealeMontgomery@paveselaw.com

Planning Consultant:

D. Wayne Arnold, AICP
Q. Grady Minor and Associates, P.A.
3800 Via Del Rey
Bonita Springs, FL 34134
Tel: 239-947-1144
Fax: 239-947-0375
Email: warnold@gradyminor.com

Traffic Consultants:

Mark Gillis
David Plummer & Associates
2271 McGregor Blvd., Ste. 200
Fort Myers, FL 33901
Tel: 239-332-2617
Fax: 239-332-2645
Email: mark.gillis@dplummer.com

Stephen Leung
David Plummer & Associates

2271 McGregor Blvd., Ste. 200
Fort Myers, FL 33901
Tel: 239-332-2617
Fax: 239-332-2645
Email: Stephen.leung@dplummer.com

Environmental Consultant:

Rae Ann Boylan
Boylan Environmental Consultants, Inc.
11000 Metro Parkway, Suite 4
Fort Myers, FL 33966
Tel: 239-418-0671
Fax: 239-418-0672
Email: raeann@boylanenv.com

Engineering Consultant:

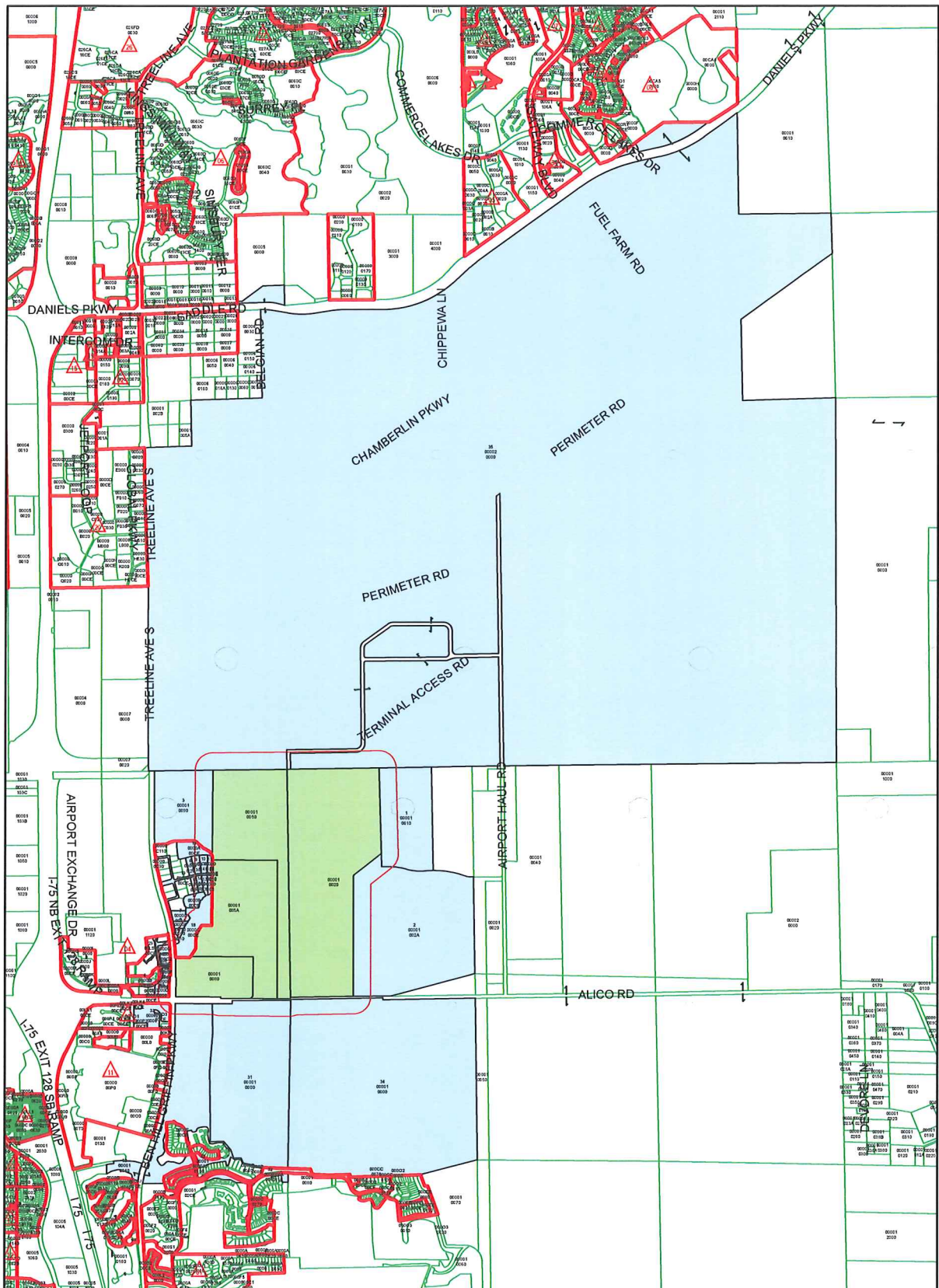
Elizabeth Fountain, P.E.
Q. Grady Minor and Associates, P.A.
11940 Fairway Lakes Dr., Ste. 6
Fort Myers, FL 33913
Tel: 239-690-4380
Fax: 239-768-0291
Email: efountain@gradyminor.com

Exhibit II.A.1
Adjacent Property Owner Map and Mailing Labels
(500 FT Radius)

VARIANCE REPORT

12/10/2009

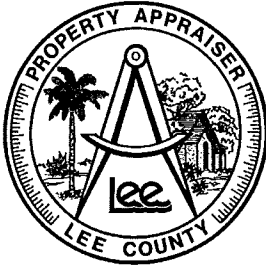
Subject Parcels : 4 Affected Parcels : 35 Buffer Distance : 500 ft



02-46-25-00-00001.0080 et al.

4,500 2,250 0

4,500 Feet



Lee County Property Appraiser

Kenneth M. Wilkinson, C.F.A.

GIS Department / Map Room

Phone: (239) 533-6159 • Fax: (239) 533-6139 • eMail: MapRoom@LeePA.org

VARIANCE REPORT

Date of Report: December 10, 2009
Buffer Distance: 500 ft
Parcels Affected: 35
Subject Parcel: 02-46-25-00-00001.0080, 02-46-25-00-00001.005A,
 02-46-25-00-00001.0050, 01-46-25-00-00001.0020

OWNER NAME AND ADDRESS	STRAP AND LOCATION	LEGAL DESCRIPTION	Map Index
PREMIER/SOM FT MYERS LLC 2875 NE 191ST ST PENTHOUSE 1B AVENTURA FL 33180	01-46-25-00-00001.0010 ACCESS UNDETERMINED FL	PARL LOC IN N 1/2 OF SECT DESC IN OR 3944 PG 4156	1
MSF AUSTIN L LLC 25.25% + 8441 COOPER CREEK BLVD UNIVERSITY PARK FL 34201	01-46-25-00-00001.002A ACCESS UNDETERMINED FORT MYERS FL 33913	POR OF SECT 1 DESC IN INST#2007-138174	2
MIDWAY PROMENADE LLC 14975 TECHNOLOGY CT FORT MYERS FL 33912	02-46-25-00-00001.0090 AIRPORT CROSSINGS FORT MYERS FL 33913	PARCEL LYING E OF TREELINE AVE AS DESC IN OR 4614 PG 975	3
COOPER HOTELS PARK	02-46-25-02-00000.00CE COOPER HOTELS PARK COMMON ELEMENT FORT MYERS FL 33913	COPPER HOTELS PARK DESC IN INST#2008000098093 COMMON ELEMENT	4
BANCAMERICA REALTY FINANCE INC GARY A WOODFIELD ESQ EDWARDS ANGELL PALMER + DODGE 1 NORTH CLEMATIS ST STE 400 WEST PALM BEACH FL 33401	02-46-25-03-00000.0C10 16301 PARALLEL DR FORT MYERS FL 33913	MERIDIAN CENTER AS DESC IN INST# 2008000146054 LOT C1	5
BANCAMERICA REALTY FINANCE INC GARY A WOODFIELD ESQ EDWARDS ANGELL PALMER + DODGE 1 NORTH CLEMATIS ST STE 400 WEST PALM BEACH FL 33401	02-46-25-03-00000.0C20 16291 PARALLEL DR FORT MYERS FL 33913	MERIDIAN CENTER AS DESC IN INST# 2008000146054 LOT C2	6
BANCAMERICA REALTY FINANCE INC GARY A WOODFIELD ESQ EDWARDS ANGELL PALMER + DODGE 1 NORTH CLEMATIS ST STE 400 WEST PALM BEACH FL 33401	02-46-25-03-00000.0C30 16271 PARALLEL DR FORT MYERS FL 33913	MERIDIAN CENTER AS DESC IN INST# 2008000146054 LOT C3	7
BANCAMERICA REALTY FINANCE INC GARY A WOODFIELD ESQ EDWARDS ANGELL PALMER + DODGE 1 NORTH CLEMATIS ST STE 400 WEST PALM BEACH FL 33401	02-46-25-03-00000.0I20 10410 MERIDIAN CENTER PKWY FORT MYERS FL 33913	MERIDIAN CENTER AS DESC IN INST# 2008000146054 LOT I2	8
BANCAMERICA REALTY FINANCE INC GARY A WOODFIELD ESQ EDWARDS ANGELL PALMER + DODGE 1 NORTH CLEMATIS ST STE 400 WEST PALM BEACH FL 33401	02-46-25-03-00000.0I30 10420 MERIDIAN CENTER PKWY FORT MYERS FL 33913	MERIDIAN CENTER AS DESC IN INST# 2008000146054 LOT I3	9
BANCAMERICA REALTY FINANCE INC GARY A WOODFIELD ESQ EDWARDS ANGELL PALMER + DODGE 1 NORTH CLEMATIS ST STE 400 WEST PALM BEACH FL 33401	02-46-25-03-00000.0I40 10430 MERIDIAN CENTER PKWY FORT MYERS FL 33913	MERIDIAN CENTER AS DESC IN INST# 2008000146054 LOT I4	10
BANCAMERICA REALTY FINANCE INC GARY A WOODFIELD ESQ EDWARDS ANGELL PALMER + DODGE 1 NORTH CLEMATIS ST STE 400 WEST PALM BEACH FL 33401	02-46-25-03-00000.0I50 10440 MERIDIAN CENTER PKWY FORT MYERS FL 33913	MERIDIAN CENTER AS DESC IN INST# 2008000146054 LOT I5	11

OWNER NAME AND ADDRESS	STRAP AND LOCATION	LEGAL DESCRIPTION	Map Index
BANCAMERICA REALTY FINANCE INC GARY A WOODFIELD ESQ EDWARDS ANGELL PALMER + DODGE 1 NORTH CLEMATIS ST STE 400 WEST PALM BEACH FL 33401	02-46-25-03-00000.0I60 10441 MERIDIAN CENTER PKWY FORT MYERS FL 33913	MERIDIAN CENTER AS DESC IN INST# 2008000146054 LOT I6	12
BANCAMERICA REALTY FINANCE INC GARY A WOODFIELD ESQ EDWARDS ANGELL PALMER + DODGE 1 NORTH CLEMATIS ST STE 400 WEST PALM BEACH FL 33401	02-46-25-03-00000.0I70 10431 MERIDIAN CENTER PKWY FORT MYERS FL 33913	MERIDIAN CENTER AS DESC IN INST# 2008000146054 LOT I7	13
BANCAMERICA REALTY FINANCE INC GARY A WOODFIELD ESQ EDWARDS ANGELL PALMER + DODGE 1 NORTH CLEMATIS ST STE 400 WEST PALM BEACH FL 33401	02-46-25-03-00000.0I80 10421 MERIDIAN CENTER PKWY FORT MYERS FL 33913	MERIDIAN CENTER AS DESC IN INST# 2008000146054 LOT I8	14
BANCAMERICA REALTY FINANCE INC GARY A WOODFIELD ESQ EDWARDS ANGELL PALMER + DODGE 1 NORTH CLEMATIS ST STE 400 WEST PALM BEACH FL 33401	02-46-25-03-00000.0I90 10411 MERIDIAN CENTER PKWY FORT MYERS FL 33913	MERIDIAN CENTER AS DESC IN INST# 2008000146054 LOT I9	15
BANCAMERICA REALTY FINANCE INC GARY A WOODFIELD ESQ EDWARDS ANGELL PALMER + DODGE 1 NORTH CLEMATIS ST STE 400 WEST PALM BEACH FL 33401	02-46-25-03-0000A.00CE LAKE FORT MYERS FL 33913	MERIDIAN CENTER AS DESC IN INST# 2008000146054 TRACT A	16
BANCAMERICA REALTY FINANCE INC GARY A WOODFIELD ESQ EDWARDS ANGELL PALMER + DODGE 1 NORTH CLEMATIS ST STE 400 WEST PALM BEACH FL 33401	02-46-25-03-0000B.00CE LAKE FORT MYERS FL 33913	MERIDIAN CENTER AS DESC IN INST# 2008000146054 TRACT B	17
BANCAMERICA REALTY FINANCE INC GARY A WOODFIELD ESQ EDWARDS ANGELL PALMER + DODGE 1 NORTH CLEMATIS ST STE 400 WEST PALM BEACH FL 33401	02-46-25-03-0000C.00CE WET LAND FORT MYERS FL 33913	MERIDIAN CENTER AS DESC IN INST# 2008000146054 TRACT C	18
BANCAMERICA REALTY FINANCE INC GARY A WOODFIELD ESQ EDWARDS ANGELL PALMER + DODGE 1 NORTH CLEMATIS ST STE 400 WEST PALM BEACH FL 33401	02-46-25-03-0000D.00CE RIGHT OF WAY FORT MYERS FL 33913	MERIDIAN CENTER AS DESC IN INST# 2008000146054 TRACT D	19
AIRPORT TECHNOLOGY CENTER LLC 3301 BONITA BEACH RD STE 307 BONITA SPRINGS FL 34134	02-46-25-03-0000E.0010 10442 MERIDIAN CENTER PKWY FORT MYERS FL 33913	MERIDIAN CENTER AS DESC IN INST# 2008000146054 TRACT E1	20
AIRPORT TECHNOLOGY CENTER LLC 3301 BONITA BEACH RD STE 307 BONITA SPRINGS FL 34134	02-46-25-03-0000E.0020 10443 MERIDIAN CENTER PKWY FORT MYERS FL 33913	MERIDIAN CENTER AS DESC IN INST# 2008000146054 TRACT E2	21
COOPER REALTY COMPANY 1661 AARON BRENNER DR STE 200 MEMPHIS TN 38120	02-46-25-04-0000D.0000 16421 CORPORATE COMMERCE WAY FORT MYERS FL 33913	GULF COAST LANDINGS DESC IN INST#2009000078147 TRACT D	22
COOPER REALTY COMPANY 1661 AARON BRENNER DR STE 200 MEMPHIS TN 38120	02-46-25-04-0000E.0000 16411 CORPORATE COMMERCE WAY FORT MYERS FL 33913	GULF COAST LANDINGS DESC IN INST#2009000078147 TRACT E	23
COOPER REALTY COMPANY 1661 AARON BRENNER DR STE 200 MEMPHIS TN 38120	02-46-25-04-0000F.0000 16401 CORPORATE COMMERCE WAY FORT MYERS FL 33913	GULF COAST LANDINGS DESC IN INST#2009000078147 TRACT F	24
COOPER REALTY COMPANY 1661 AARON BRENNER DR STE 200 MEMPHIS TN 38120	02-46-25-04-0000G.0000 16371 CORPORATE COMMERCE WAY FORT MYERS FL 33913	GULF COAST LANDINGS DESC IN INST#2009000078147 TRACT G	25
COOPER REALTY COMPANY 1661 AARON BRENNER DR STE 200 MEMPHIS TN 38120	02-46-25-04-0000J.00CE EASEMENT FORT MYERS FL 33913	GULF COAST LANDINGS DESC IN INST#2009000078147 TRACT J	26
COOPER REALTY COMPANY 1661 AARON BRENNER DR STE 200 MEMPHIS TN 38120	02-46-25-04-000C2.00CE ACCESS UNDETERMINED FORT MYERS FL 33913	GULF COAST LANDINGS DESC IN INST#2009000078147 TRACT C-2	27
COOPER REALTY COMPANY 1661 AARON BRENNER DR STE 200 MEMPHIS TN 38120	02-46-25-04-00LS2.00CE ACCESS UNDETERMINED FORT MYERS FL 33913	GULF COAST LANDINGS DESC IN INST#2009000078147 TRACT LS-2	28

OWNER NAME AND ADDRESS	STRAP AND LOCATION	LEGAL DESCRIPTION	Map Index
COOPER REALTY COMPANY 1661 AARON BRENNER DR STE 200 MEMPHIS TN 38120	02-46-25-04-00LS3.00CE ACCESS UNDETERMINED FORT MYERS FL 33913	GULF COAST LANDINGS DESC IN INST#2009000078147 TRACT LS-3	29
COOPER REALTY COMPANY 1661 AARON BRENNER DR STE 200 MEMPHIS TN 38120	02-46-25-04-00RD1.00CE RIGHT OF WAY FORT MYERS FL 33913	GULF COAST LANDINGS DESC IN INST#2009000078147 TRACT RD-1	30
ALICO-AGRI LTD PO BOX 338 LABELLE FL 33975	11-46-25-00-00001.0000 COLLEGE CLUB DR FORT MYERS FL 33913	ALL SEC 11 LESS TH N50FT + 1-75+1.0010 THRU 1.004+ ADDITIONAL R/W OR 3032 PG 3888 LESS OR 3956/4074 + OR 4161/4145	31
MIROMAR LAKES LLC 10801 CORKSCREW RD STE 305 ESTERO FL 33928	11-46-25-00-00001.0040 ACCESS UNDETERMINED MIROMAR LAKES FL 33913	PARCEL LYING E AND W OF BEN HILL GRIFFIN PKWY DESC OR 3165 PG 1800 LESS SPLITS +OR 4535/4064+ 4697/75 + 4672/1318 + OR 4736/182+ SUBDS + LESS OR 4812 PG 1385 + INST 2005-72048	32
LEE COUNTY REAL ESTATE HOLDING THOMPSON HINE LLP 127 PUBLIC SQUARE CLEVELAND OH 44114	11-46-25-13-00002.0000 ACCESS UNDETERMINED FORT MYERS FL 33913	UNIVERSITY PLAZA AS DESC IN INST #2008000335780 TRACT 2	33
ALICO-AGRI LTD PO BOX 338 LABELLE FL 33975	12-46-25-00-00001.0000 11840 ALICO RD FORT MYERS FL 33913	ALL SEC 12 LESS THE N 50 FT OF W 1/2 AND LESS OR 3165/1800 + LESS OR 3532 PG 3888	34
LEE COUNTY PORT AUTHORITY STE 0571 11000 TERMINAL ACCESS RD FORT MYERS FL 33913	19-45-26-00-00002.0000 11000 TERMINAL ACCESS RD FORT MYERS FL 33913	MULTI SECTION TWP 45 RG 25/26 SWFL INTERNATIONAL AIRPORT DESC IN OR 3344 PG 2141	35

35 RECORDS PRINTED

01-46-25-00-00001.0010
PREMIER/SOM FT MYERS LLC
2875 NE 191ST ST
PENTHOUSE 1B
AVENTURA, FL 33180

02-46-25-00-00001.0090
MIDWAY PROMENADE LLC
14975 TECHNOLOGY CT
FORT MYERS, FL 33912

02-46-25-03-00000.0C10
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-00000.0C30
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-00000.0I30
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-00000.0I50
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-00000.0I70
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-00000.0I90
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-0000B.00CE
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-0000D.00CE
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

01-46-25-00-00001.002A
MSF AUSTIN L LLC 25.25% +
8441 COOPER CREEK BLVD
UNIVERSITY PARK, FL 34201

02-46-25-02-00000.00CE
COOPER HOTELS PARK

02-46-25-03-00000.0C20
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-00000.0I20
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-00000.0I40
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-00000.0I60
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-00000.0I80
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-0000A.00CE
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-0000C.00CE
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-0000E.0010
AIRPORT TECHNOLOGY CENTER LLC
3301 BONITA BEACH RD STE 307
BONITA SPRINGS, FL 34134

02-46-25-03-0000E.0020
AIRPORT TECHNOLOGY CENTER LLC
3301 BONITA BEACH RD STE 307
BONITA SPRINGS, FL 34134

02-46-25-04-0000D.0000
COOPER REALTY COMPANY
1661 AARON BRENNER DR STE 200
MEMPHIS, TN 38120

02-46-25-04-0000E.0000
COOPER REALTY COMPANY
1661 AARON BRENNER DR STE 200
MEMPHIS, TN 38120

02-46-25-04-0000F.0000
COOPER REALTY COMPANY
1661 AARON BRENNER DR STE 200
MEMPHIS, TN 38120

02-46-25-04-0000G.0000
COOPER REALTY COMPANY
1661 AARON BRENNER DR STE 200
MEMPHIS, TN 38120

02-46-25-04-0000J.00CE
COOPER REALTY COMPANY
1661 AARON BRENNER DR STE 200
MEMPHIS, TN 38120

02-46-25-04-000C2.00CE
COOPER REALTY COMPANY
1661 AARON BRENNER DR STE 200
MEMPHIS, TN 38120

02-46-25-04-00LS2.00CE
COOPER REALTY COMPANY
1661 AARON BRENNER DR STE 200
MEMPHIS, TN 38120

02-46-25-04-00LS3.00CE
COOPER REALTY COMPANY
1661 AARON BRENNER DR STE 200
MEMPHIS, TN 38120

02-46-25-04-00RD1.00CE
COOPER REALTY COMPANY
1661 AARON BRENNER DR STE 200
MEMPHIS, TN 38120

11-46-25-00-00001.0000
ALICO-AGRI LTD
PO BOX 338
LABELLE, FL 33975

11-46-25-00-00001.0040
MIROMAR LAKES LLC
10801 CORKSCREW RD STE 305
ESTERO, FL 33928

11-46-25-13-00002.0000
LEE COUNTY REAL ESTATE HOLDING
THOMPSON HINE LLP
127 PUBLIC SQUARE
CLEVELAND, OH 44114

12-46-25-00-00001.0000
ALICO-AGRI LTD
PO BOX 338
LABELLE, FL 33975

19-45-26-00-00002.0000
LEE COUNTY
PORT AUTHORITY
STE 0571
11000 TERMINAL ACCESS RD
FORT MYERS, FL 33913

01-46-25-00-00001.0010
PREMIER/SOM FT MYERS LLC
2875 NE 191ST ST
PENTHOUSE 1B
AVENTURA, FL 33180

02-46-25-00-00001.0090
MIDWAY PROMENADE LLC
14975 TECHNOLOGY CT
FORT MYERS, FL 33912

02-46-25-03-00000.0C10
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-00000.0C30
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-00000.0I30
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-00000.0I50
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-00000.0I70
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-00000.0I90
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-0000B.00CE
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-0000D.00CE
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

01-46-25-00-00001.002A
MSF AUSTIN L LLC 25.25% +
8441 COOPER CREEK BLVD
UNIVERSITY PARK, FL 34201

02-46-25-02-00000.00CE
COOPER HOTELS PARK

02-46-25-03-00000.0C20
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-00000.0I20
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-00000.0I40
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-00000.0I60
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-00000.0I80
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-0000A.00CE
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-0000C.00CE
BANCAMERICA REALTY FINANCE INC
GARY A WOODFIELD ESQ
EDWARDS ANGELL PALMER + DODGE
1 NORTH CLEMATIS ST STE 400
WEST PALM BEACH, FL 33401

02-46-25-03-0000E.0010
AIRPORT TECHNOLOGY CENTER LLC
3301 BONITA BEACH RD STE 307
BONITA SPRINGS, FL 34134

02-46-25-03-0000E.0020
AIRPORT TECHNOLOGY CENTER LLC
3301 BONITA BEACH RD STE 307
BONITA SPRINGS, FL 34134

02-46-25-04-0000D.0000
COOPER REALTY COMPANY
1661 AARON BRENNER DR STE 200
MEMPHIS, TN 38120

02-46-25-04-0000E.0000
COOPER REALTY COMPANY
1661 AARON BRENNER DR STE 200
MEMPHIS, TN 38120

02-46-25-04-0000F.0000
COOPER REALTY COMPANY
1661 AARON BRENNER DR STE 200
MEMPHIS, TN 38120

02-46-25-04-0000G.0000
COOPER REALTY COMPANY
1661 AARON BRENNER DR STE 200
MEMPHIS, TN 38120

02-46-25-04-0000J.00CE
COOPER REALTY COMPANY
1661 AARON BRENNER DR STE 200
MEMPHIS, TN 38120

02-46-25-04-000C2.00CE
COOPER REALTY COMPANY
1661 AARON BRENNER DR STE 200
MEMPHIS, TN 38120

02-46-25-04-00LS2.00CE
COOPER REALTY COMPANY
1661 AARON BRENNER DR STE 200
MEMPHIS, TN 38120

02-46-25-04-00LS3.00CE
COOPER REALTY COMPANY
1661 AARON BRENNER DR STE 200
MEMPHIS, TN 38120

02-46-25-04-00RD1.00CE
COOPER REALTY COMPANY
1661 AARON BRENNER DR STE 200
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11-46-25-00-00001.0000
ALICO-AGRI LTD
PO BOX 338
LABELLE, FL 33975

11-46-25-00-00001.0040
MIROMAR LAKES LLC
10801 CORKSCREW RD STE 305
ESTERO, FL 33928

11-46-25-13-00002.0000
LEE COUNTY REAL ESTATE HOLDING
THOMPSON HINE LLP
127 PUBLIC SQUARE
CLEVELAND, OH 44114

12-46-25-00-00001.0000
ALICO-AGRI LTD
PO BOX 338
LABELLE, FL 33975

19-45-26-00-00002.0000
LEE COUNTY
PORT AUTHORITY
STE 0571
11000 TERMINAL ACCESS RD
FORT MYERS, FL 33913

Exhibit IV.A.1
Proposed Text Change

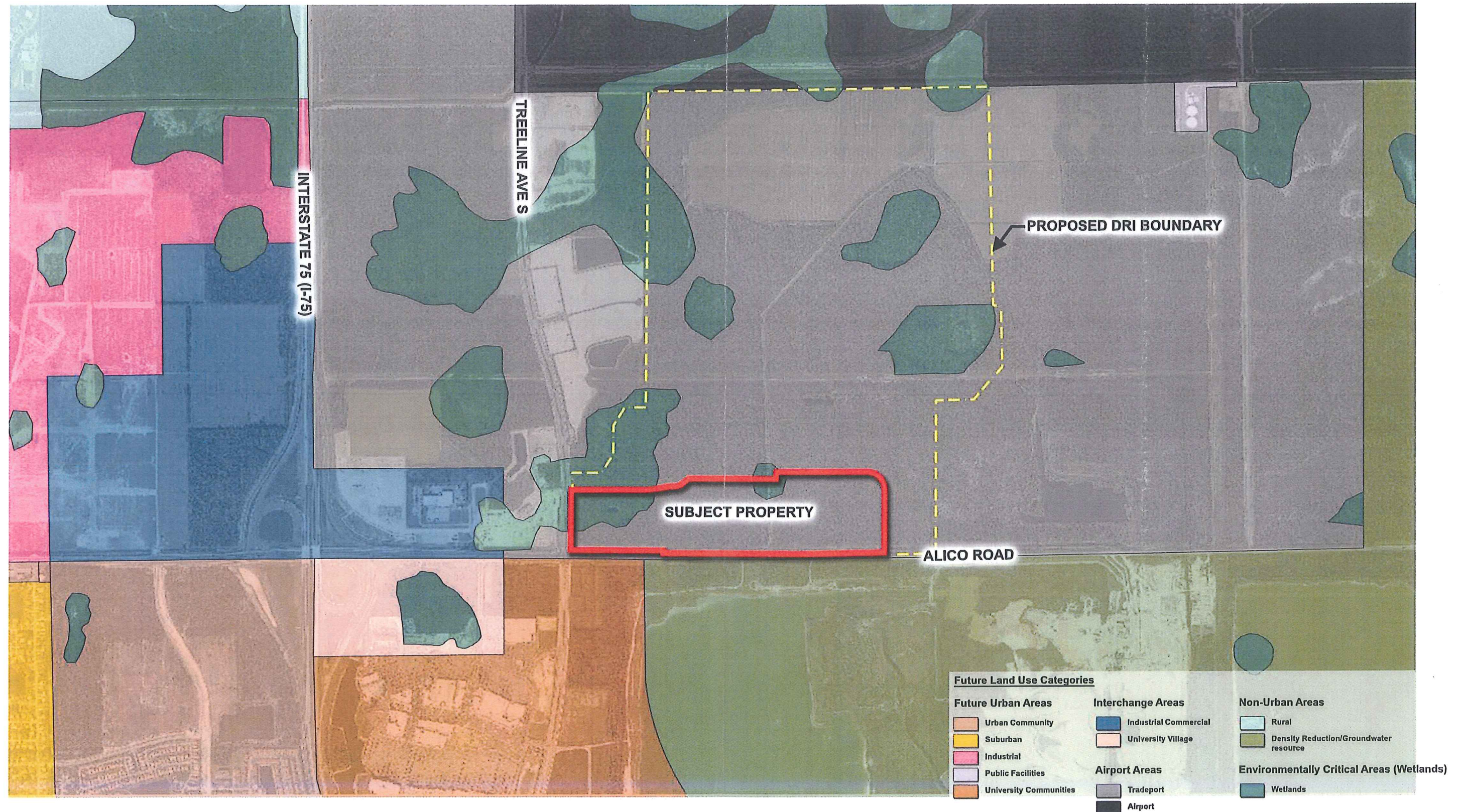
Policy 1.2.2: The Tradeport areas are commercial and industrial lands adjacent to the airport needed to accommodate projected growth through the year 2020. These areas will include developments consisting of light manufacturing or assembly, warehousing, and distribution facilities; offices; research and development activities; ground transportation and airport-related terminals or transfer facilities; and hotels/motels, meeting facilities; and retail uses within hotels/motels. Ancillary retail and Corner Store commercial uses, intended to support the surrounding business and industrial land uses, are allowed if they are part of a Planned Development. Residential uses, other than bona fide caretaker residences, are not permitted in this category except to the extent provided in Chapter XIII of the Plan. Caretaker residences are not permitted in the Airport Noise Zone 3. Because this area is located within the Six Mile Cypress Basin and is also a primary point of entry into Lee County, special environmental and design review guidelines will be applied to its development to maintain the appearance of this area as a primary point of entry into Lee County. Property in Section 1 and the east 1/2 of Section 2, Township 46 South, Range 25 East, and in Section 6, Township 46 South, Range 26 East, must be rezoned to a planned development zoning category prior to any development other than the construction of essential public services. During the rezoning process, the best environmental management practices identified on pages 43 and 44 of the July 28, 1993 Henigar & Ray study entitled, "Groundwater Resource Protection Study" will be rebuttably presumed to be necessary to protect potential groundwater resources in the area."

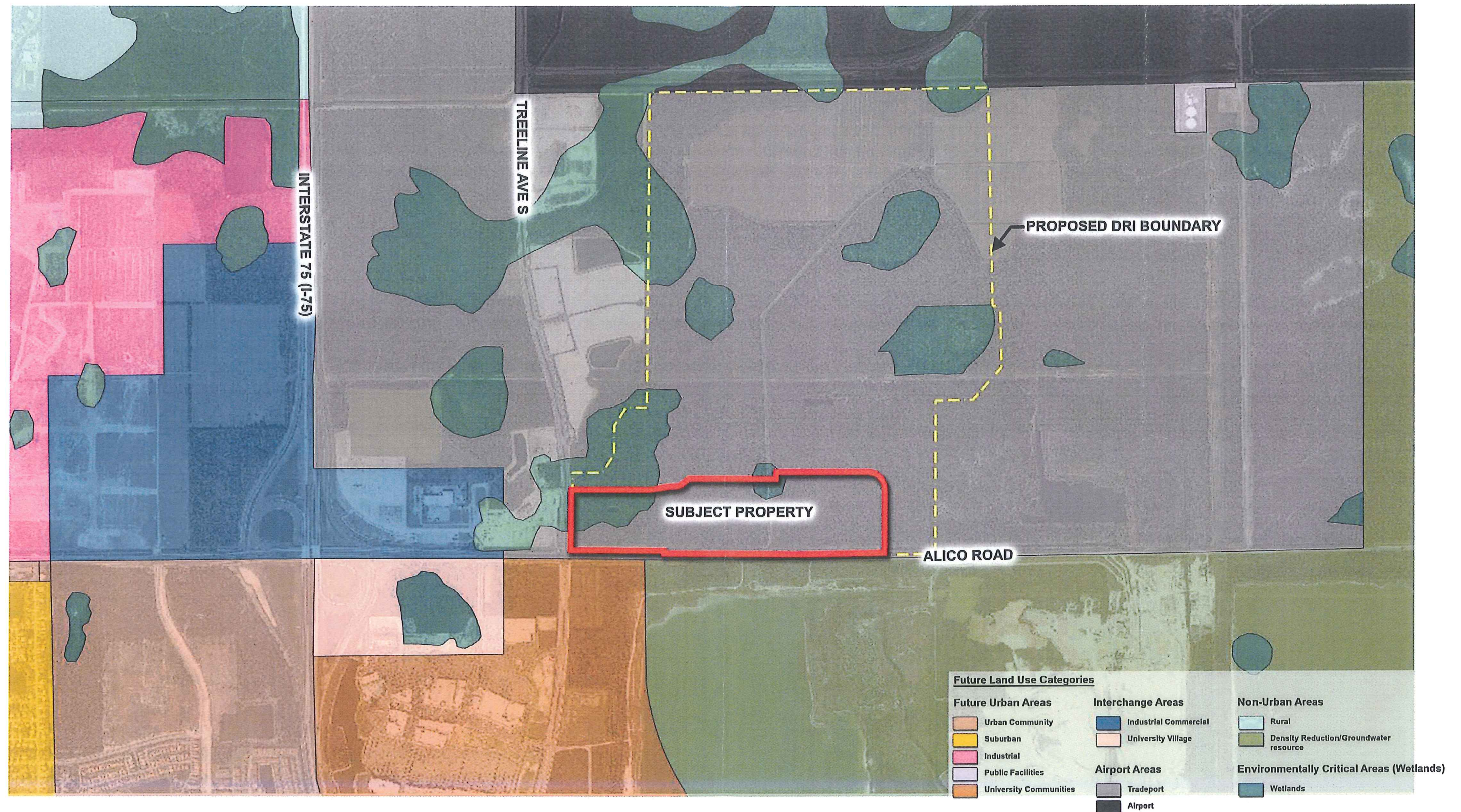
Policy 1.2.2.1: Community and Regional retail commercial uses are permitted in the Tradeport Future Land Use Category, in addition to Corner Store commercial, under limited circumstances. Non-ancillary community and regional retail commercial are permitted in those instances when there is an adequate transportation network, an adequate market, and where the retail is part of a larger mixed use development that is capable of meeting the economic diversification needs of the county. The community and regional retail commercial is only permitted in the Tradeport Future Land Use Category under the following circumstances:

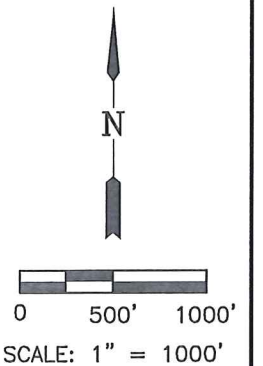
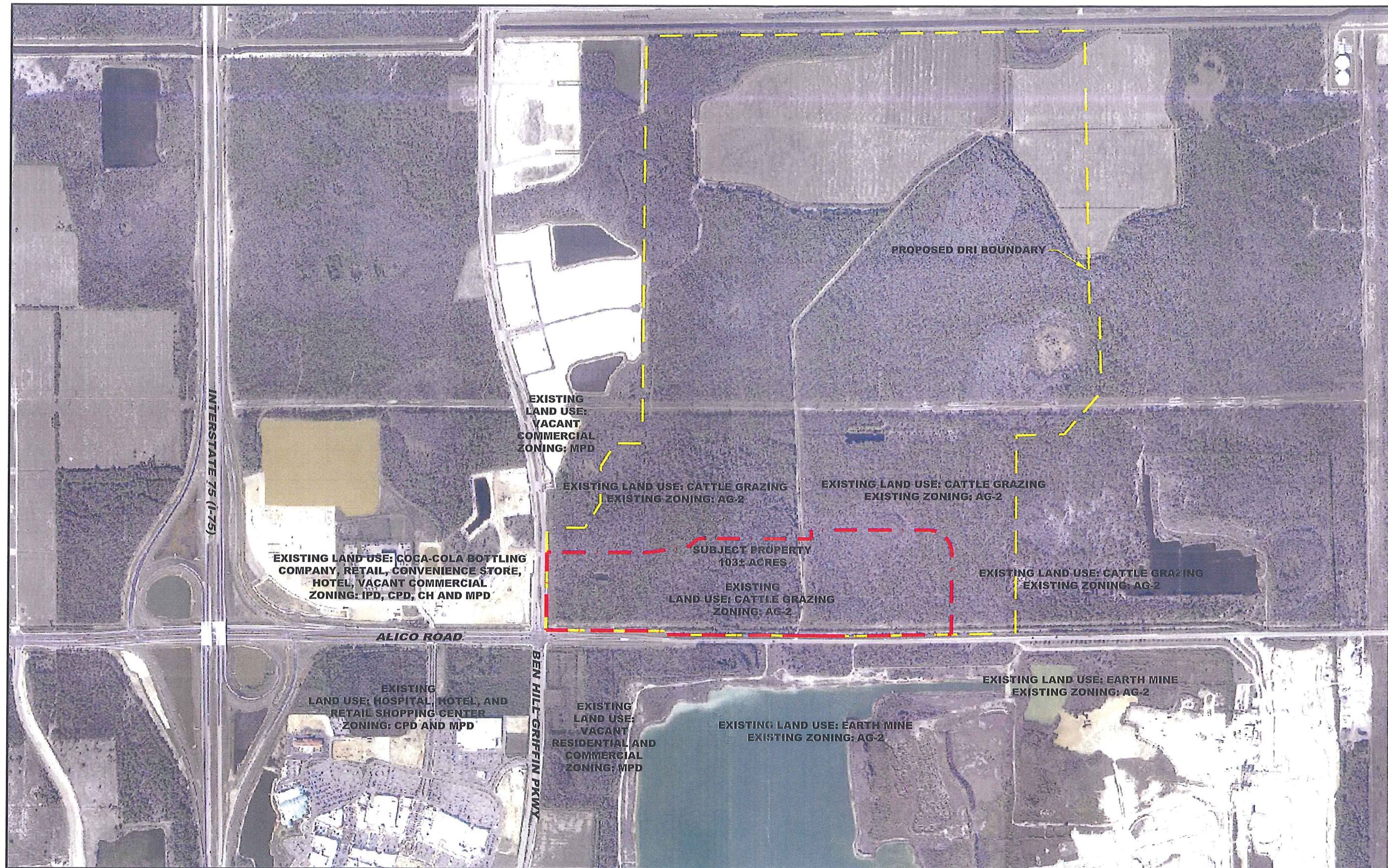
1. The regional and community retail commercial uses must be approved as part of a Development of Regional Impact.
2. The regional and community retail commercial uses must be approved as part of Mixed Planned Development or as a Commercial Planned Development/Industrial Planned Development.
3. The project must be located at the intersection of an arterial and collector roadway, or at the intersection of two arterial roadways, with direct access to each of the roadways. The project must also be located within one mile of an Interstate highway.
4. The regional and community retail commercial uses may not exceed 15% of the total retail, office, and industrial square footage of the Development of Regional Impact.

5. The office, industrial, hotel, or other uses within the Development of Regional Impact must be able to access the community and regional retail commercial without the need to utilize the external road network.
6. The community and regional retail commercial uses will not exceed an FAR of 0.16.
7. An economic analysis is submitted that indicates that the Development of Regional Impact will meet no less than 5% of the 2030 demand for industrial and office uses which are needed for economic diversification.

Policy 2.12.2: Future development within the Tradeport and Industrial Development future land use categories is strongly encouraged to be designed to include a mixture of research and development, industrial, and related offices uses, where appropriate. Public and quasi-public, community facility and recreational uses shall also be permitted where appropriate and reviewed as part of a planned development.







LEGEND

Revision	Date	Description

DESIGNED BY:	QCMA
DRAWN BY:	SU
APPROVED:	DWA
JOB CODE:	FCCTRPDR
SCALE:	11x17 1" = 1,000'
By	



GradyMinor

Civil Engineers • Land Surveyors • Planners • Landscape Architects
CERT. OF AUTH. EB 0005151 CERT. OF AUTH. LB 0005151 BUSINESS LC 26000266
www.GradyMinor.com Q. Grady Minor and Associates, P.A.

Bonita Springs 239.947.1144
Fort Myers 239.690.4380
North Port 941.426.5858
Naples 239.444.2397

FLORIDA GULF COAST TECHNOLOGY AND RESEARCH PARK

**EXHIBIT IV.A.4, IV.A.5 & IV.A.8
EXISTING LAND USES AND ZONING
DATE AERIAL FLOWN: JANUARY 2008**

MUNICIPALITY:	LEE COUNTY
BEC/TWN/ROE:	01, 02/46S/25E
DATE:	DECEMBER 2009
FILE NAME:	
CPA - EXISTING ZONING AND LAND USES	
SHEET	1 OF 1

PROPERTY DESCRIPTION

COMMENCING AT THE SOUTHEAST CORNER OF SECTION 2, TOWNSHIP 46 SOUTH, RANGE 25 EAST, LEE COUNTY, FLORIDA; THENCE RUN ALONG THE EAST LINE OF SAID SECTION, NORTH 01°03'01" WEST, A DISTANCE OF 50.00 FEET TO A POINT ON THE NORTH RIGHT-OF-WAY LINE OF ALICO ROAD AS RECORDED IN OFFICIAL RECORD BOOK 38, PAGE 175 OF THE PUBLIC RECORDS OF LEE COUNTY, FLORIDA, AND THE POINT OF BEGINNING;

THENCE RUN ALONG SAID NORTH RIGHT-OF-WAY LINE, NORTH 89°43'05" WEST, A DISTANCE OF 1,996.03 FEET; THENCE NORTH 00°16'55" EAST, A DISTANCE OF 40.00 FEET; THENCE NORTH 89°43'05" WEST, A DISTANCE OF 640.55 FEET; THENCE NORTH 89°42'57" WEST, A DISTANCE OF 639.08 FEET TO A POINT OF CURVAUTRE ON THE EAST RIGHT-OF-WAY LINE OF BEN HILL GRIFFIN PARKWAY AS RECORDED IN OFFICIAL RECORD BOOK 3207, PAGE 1910; THENCE RUN ALONG SAID RIGHT-OF-WAY LINE, 10.07 FEET, ALONG THE ARC OF A NON TANGENTIAL CURVE TO THE RIGHT HAVING A RADIUS OF 50.00 FEET, A CENTRAL ANGLE OF 11°32'22", (CHC

ERLY, 8.38 FEET, ALONG THE ARC OF A CURVE TO THE LEFT HAVING A RADIUS OF 6,074.11 FEET, A CENTRAL ANGLE OF 00°04'44", (CHORD OF SAID ARC BEARING NORTH 00°14'33" EAST, A DISTANCE OF 8.38 FEET) TO A POINT; THENCE LEAVING SAID EAST RIGHT-OF-WAY LINE, NORTH 89°59'56" EAST, A DISTANCE OF 1,087.88 FEET TO A POINT OF CURVATURE; THENCE EASTERLY, 40.64 FEET, ALONG THE ARC OF A CURVE TO THE LEFT HAVING A RADIUS OF 260.00 FEET, A CENTRAL ANGLE OF 08°57'21", (CHORD OF SAID ARC BEARING NORTH 85°31'15" EAST, A DISTANCE OF 40.60 FEET) TO A POINT; THENCE NORTH 81°02'35" EAST, A DISTANCE OF 254.93 FEET TO A POINT OF CURVATURE; THENCE EASTERLY, 21.88 FEET, ALONG THE ARC OF A CURVE TO THE RIGHT HAVING A RADIUS OF 140.00 FEET, A CENTRAL ANGLE OF 08°57'15", (CHORD OF SAID ARC BEARING NORTH 85°31'12" EAST, A DISTANCE OF 21.86 FEET) TO A POINT; THENCE NORTH 89°59'50" EAST, A DISTANCE OF 38.14 FEET TO A POINT OF CURVATURE; THENCE NORTHEASTERLY, 161.79 FEET, ALONG THE ARC OF A CURVE TO THE LEFT HAVING A RADIUS OF 200.00 FEET, A CENTRAL ANGLE OF 46°20'56", (CHORD OF SAID ARC BEARING NORTH 66°49'22" EAST, A DISTANCE OF 157.41 FEET) TO A POINT OF REVERSE CURVATURE; THENCE

NORTHEASTERLY, 25.42 FEET, ALONG THE ARC OF A CURVE TO THE RIGHT HAVING A RADIUS OF 140.00 FEET, A CENTRAL ANGLE OF 10°24'06", (CHORD OF SAID ARC BEARING NORTH 48°50'57" EAST, A DISTANCE OF 25.38 FEET) TO A POINT; THENCE NORTH 54°02'59" EAST, A DISTANCE OF 31.44 FEET TO A POINT OF CURVATURE; THENCE EASTERLY, 44.11 FEET, ALONG THE ARC OF A CURVE TO THE RIGHT HAVING A RADIUS OF 70.00 FEET, A CENTRAL ANGLE OF 36°06'08", (CHORD OF SAID ARC BEARING NORTH 72°06'03" EAST, A DISTANCE OF 43.38 FEET) TO A POINT; THENCE SOUTH 89°50'53" EAST, A DISTANCE OF 1,195.32 FEET; THENCE NORTH 00°00'10" WEST, A DISTANCE OF 98.64 FEET; THENCE NORTH 89°59'50" EAST, A DISTANCE OF 1,282.02 FEET TO A POINT OF CURVATURE; THENCE SOUTHEASTERLY, 392.70 FEET, ALONG THE ARC OF A CURVE TO THE RIGHT HAVING A RADIUS OF 250.00 FEET, A CENTRAL ANGLE OF 90°00'00", (CHORD OF SAID ARC BEARING SOUTH 45°00'10" EAST, A DISTANCE OF 353.55 FEET) TO A POINT; THENCE SOUTH 00°00'10" EAST, A DISTANCE OF 887.44 FEET TO A POINT ON THE NORTH RIGHT-OF-WAY LINE OF ALICO ROAD; THENCE ALONG SAID RIGHT-OF-WAY LINE, SOUTH 88°58'51" WEST, A DISTANCE OF 1,111.97 FEET TO THE POINT OF BEGINNING.

CONTAINING 102.744 ACRES, MORE OR LESS.

NOTES:

- 1. BEARINGS AND COORDINATES SHOWN HEREON ARE REFERENCED TO THE FLORIDA STATE PLANE COORDINATE SYSTEM, WEST ZONE, NORTH AMERICAN DATUM OF 1983, AS PUBLISHED IN THE REFERENCED CERTIFIED CORNER RECORDS. THE EAST LINE OF SECTION 2, BEING N 01°03'01 W.
- 2. DIMENSIONS SHOWN HEREON ARE IN U.S. SURVEY FEET AND DECIMALS THEREOF.
- 3. THIS PLAN IS NOT VALID WITHOUT THE SIGNATURE AND ORIGINAL RAISED SEAL OF A LICENSED FLORIDA SURVEYOR AND MAPPER. NO ADDITIONS OR DELETIONS TO THIS SURVEY MAP ARE PERMITTED WITHOUT THE EXPRESSED WRITTEN CONSENT OF THE SIGNING PARTY.

THIS IS NOT A SURVEY

DRAWN BY:	ARC
CHECKED BY:	RLH
JOB CODE:	FGCTRPDRI
SCALE:	1"= 400'
DATE:	21 DEC. 2009
FILE:	B-3822.dwg
SHEET:	1 of 2



GradyMinor
11940 FAIRWAY LAKES DRIVE, SUITE 6
FORT MYERS, FLORIDA 33913

Civil Engineers • Land Surveyors • Planners • Landscape Architects
CERT. OF AUTH. EB 0005151 CERT. OF AUTH. LB 0005151 BUSINESS LC 26000266
www.GradyMinor.com Q. Grady Minor and Associates, P.A.

Bonita Springs 239.947.1144
Fort Myers 239.690.4380
North Port 941.426.5858
Naples 239.444.2397

EXHIBIT IV.A.6: SKETCH & LEGAL DESCRIPTION

PREPARED FOR:
BENDERSON DEVELOPMENT COMPANY, LLC
ALICO ROAD
FORT MYERS, FL 33913
SECTION 1 & 2, TOWNSHIP 46 SOUTH, RANGE 25 EAST
LEE COUNTY, FLORIDA

RANDALL L. HENDRA, P.S.M.
FL LICENSE #6091
FOR THE FIRM

CURVE TABLE

CURVE #	RADIUS	DELTA	LENGTH	CHORD BEARING	CHORD LENGTH
C1	50.00'	11° 32' 22"	10.07'	N 5°29'10" W	10.05'
C2	6074.11'	0° 04' 44"	8.38'	N 0°14'33" E	8.38'
C3	260.00'	8° 57' 21"	40.64'	N 85°31'15" E	40.60'
C4	140.00'	8° 57' 15"	21.88'	N 85°31'12" E	21.86'
C5	200.00'	46° 20' 56"	161.79'	N 66°49'22" E	157.41'
C6	140.00'	10° 24' 06"	25.42'	N 48°50'57" E	25.38'
C7	70.00'	36° 06' 08"	44.11'	N 72°06'03" E	43.38'
C8	250.00'	90° 00' 00"	392.70'	S 45°00'10" E	353.55'



0' 200' 400' 800'
SCALE: 1" = 400'

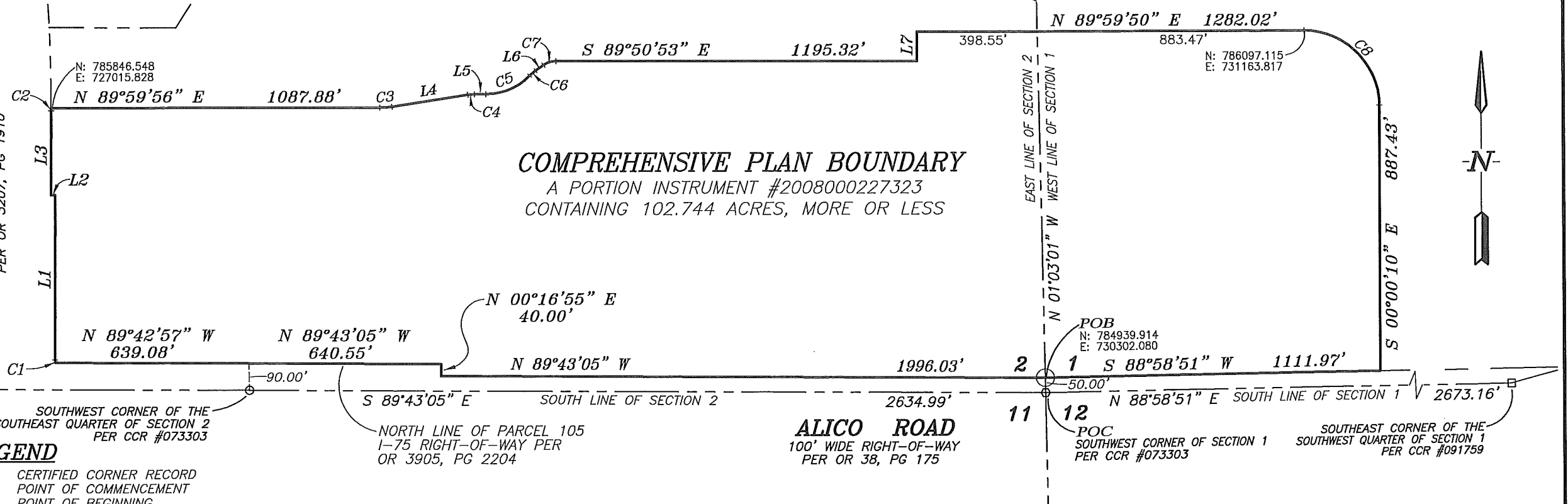
THIS PLAN MAY HAVE BEEN ENLARGED
OR REDUCED FROM INTENDED DISPLAY
SCALE FOR REPRODUCTION REASONS

LINE TABLE

LINE #	BEARING	DISTANCE
L1	N 0°16'55" E	550.01'
L2	N 89°43'05" W	14.00'
L3	N 0°16'55" E	282.03'
L4	N 81°02'35" E	254.93'
L5	N 89°59'50" E	38.14'
L6	N 54°02'59" E	31.44'
L7	N 0°00'10" W	98.64'

BEN HILL GRIFFIN PARKWAY

PER OR 3207, PG 1910



DRAWN BY:	ARC
CHECKED BY:	RLH
JOB CODE:	FGCTRPDR1
SCALE:	1"=400'
DATE:	21 DEC. 2009
FILE:	B-3822.dwg
SHEET:	2 of 2



GradyMinor

11940 FAIRWAY LAKES DRIVE, SUITE 6
FORT MYERS, FLORIDA 33913

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Bonita Springs 239.947.1144
Fort Myers 239.690.4380
North Port 941.426.5858
Naples 239.444.2397

EXHIBIT IV.A.6: SKETCH & LEGAL DESCRIPTION

PREPARED FOR:

BENDERSON DEVELOPMENT COMPANY, LLC
ALICO ROAD
FORT MYERS, FL 33913
SECTION 1 & 2, TOWNSHIP 46 SOUTH, RANGE 25 EAST
LEE COUNTY, FLORIDA

NOT VALID WITHOUT
SHEET 1 & 2 OF 2

Exhibit IV.A.7
Deed

This Document Prepared by and Return to:
Alicia H. Gayton, Esq.
8441 Cooper Creek Blvd.
University Park, Florida 34201
Parcel ID Numbers: 06-46-26-00-00001.0020,
07-46-26-00.00001.0040, 07-46-26-00.00001.0020,
07-46-26-00.00001.0010, 02-46-25-00.00001.0050,
12-46-25-00.00001.0020, 02-46-25-00-00001-0080,
01-46-25-00-00001-0020, 06-46-26-00-00001-0070
02-46-25-00.00001.005A, 01-46-25-00-00001-002A

WARRANTY DEED

THIS INDENTURE, made this 21 day of ~~June~~ ^{AUGUST} 2008, between **VE Associates, LLC**, a Florida limited liability company, whose address is 8441 Cooper Creek Blvd., University Park, FL 34201 ("GRANTOR"), and **ALICO-VIII, LLC.**, a Florida limited liability company, whose address is 8441 Cooper Creek Blvd., University Park, FL 34201 ("GRANTEE").

WITNESSETH: That the GRANTOR, in consideration of the sum of **one dollar (\$1.00)** and other good and valuable consideration to GRANTOR in hand paid by GRANTEE, the receipt whereof is hereby acknowledged, have granted, bargained and sold to the said GRANTEE and GRANTEE'S heirs, successors and assigns forever, an **UNDIVIDED 1.7343% INTEREST** as tenant in common in and to the following described land, situate, lying and being in the County of LEE, State of FLORIDA, to wit:

SEE ATTACHED EXHIBIT "A" - LEGAL DESCRIPTION.

SUBJECT TO easements, restrictions and reservations of record, and real property taxes and assessments for the year 2008 and subsequent years, which are not yet due and payable.

TOGETHER with all tenements, hereditaments and appurtenances thereto belonging or in anyway appertaining. TO HAVE AND TO HOLD, the same in fee simple forever. AND the GRANTOR hereby covenant with said GRANTEE that GRANTOR is lawfully seized of said land in fee simple; that GRANTOR has good right and lawful authority to sell and convey said land; that GRANTOR hereby fully warrants the title to said land will defend the same against the lawful claims of all persons.

IN WITNESS WHEREOF, the GRANTOR has hereunto set its hand and seal the day and year first above written.

Alicia H. Gayton
Witness Printed Name: Alicia H. Gayton

VE ASSOCIATES, LLC

Kimberly J. Taylor
Witness Printed Name: Kimberly J. Taylor

By: David H. Baldauf
David H. Baldauf, Manager

STATE OF FLORIDA)
COUNTY OF MANATEE) SS:

The foregoing instrument was acknowledged before me this 21 day of August, 2008 by David H. Baldauf, Manager of VE Associates, LLC., a Florida limited liability company on behalf of the company. He is personally known to me.

Alicia H. Gayton
Printed Name: _____
Notary Public State of Florida
My Commission Expires: _____

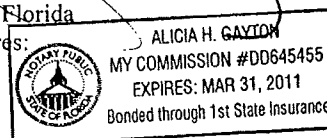


Exhibit "A"
Legal Description

Parcels A, B and C as described on sheets 1 through 8
attached hereto.

Cen

Parcel A

Branks Engineering, Inc.Professional Engineers, Planners & Land Surveyors
FORT MYERS • NAPLES • SARASOTA

DESCRIPTION
OF A
PARCEL OF LAND
LYING IN
SECTIONS 1, 2 & 12, TOWNSHIP 46 SOUTH, RANGE 25 EAST
AND
SECTIONS 6 & 7, TOWNSHIP 46 SOUTH, RANGE 26 EAST
LEE COUNTY, FLORIDA

(717.69 ACRE PARCEL)

A TRACT OR PARCEL OF LAND SITUATED IN THE STATE OF FLORIDA, COUNTY OF LEE, LYING IN SECTIONS 1, 2 & 12, TOWNSHIP 46 SOUTH, RANGE 25 EAST AND SECTIONS 6 & 7, TOWNSHIP 46 SOUTH, RANGE 26 EAST, BEING FURTHER DESCRIBED AS FOLLOWS:

COMMENCING AT THE NORTHEAST CORNER OF THE SOUTHEAST QUARTER OF SAID SECTION 1; THENCE S.00°54'31"E. ALONG THE EAST LINE OF SAID TRACT FOR 634.91 FEET TO THE POINT OF BEGINNING; THENCE S.90°00'00"E. FOR 765.89 FEET TO THE BEGINNING OF A CURVE TO THE RIGHT HAVING A RADIUS OF 50.00 FEET; THENCE SOUTHEASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 89°05'29" FOR 77.75 FEET TO AN INTERSECTION WITH THE WEST LINE OF A ROADWAY AND PUBLIC UTILITY RIGHT-OF-WAY AS DESCRIBED IN OFFICIAL RECORDS BOOK 1398, AT PAGE 2147 OF SAID PUBLIC RECORDS OF LEE COUNTY, FLORIDA; THENCE S.00°54'31"E. ALONG SAID WEST LINE FOR 2609.38 FEET; THENCE S.00°49'01"E. ALONG THE SAID WEST LINE FOR 620.40 FEET TO AN INTERSECTION WITH THE NORTH RIGHT-OF-WAY LINE OF ALICO ROAD (100 FEET WIDE) AS DESCRIBED IN OFFICIAL RECORDS BOOK 399 AT PAGE 334 OF SAID PUBLIC RECORDS OF LEE COUNTY; THENCE S.89°00'24"W. ALONG SAID NORTH LINE FOR 815.00 FEET; THENCE CONTINUE S.89°00'24"W. ALONG SAID NORTH LINE FOR 2597.58 FEET TO AN INTERSECTION WITH THE NORTH LINE OF SAID ALICO ROAD AS DESCRIBED IN OFFICIAL RECORDS BOOK 38, AT PAGE 175 OF SAID PUBLIC RECORDS OF LEE COUNTY; THENCE S.88°59'02"W. ALONG SAID NORTH LINE FOR 2673.10 FEET; THENCE N.89°42'47"W. ALONG SAID NORTH LINE FOR 1995.75 FEET TO THE SOUTHEAST CORNER OF PARCEL 105 AS DESCRIBED IN OFFICIAL RECORDS BOOK 3905, AT PAGES 2204 THROUGH 2206 OF THE PUBLIC RECORDS OF SAID LEE COUNTY; THENCE N.00°17'13"E. ALONG THE EAST LINE OF SAID PARCEL FOR 40.00 FEET TO THE NORTHEAST CORNER OF SAID PARCEL; THENCE N.89°42'47"W. ALONG THE NORTH LINE OF SAID PARCEL FOR 640.54 FEET TO AN INTERSECTION WITH THE WEST LINE OF THE SOUTHEAST QUARTER OF SAID SECTION 2; THENCE N.89°42'55"W. ALONG SAID NORTH LINE FOR 639.08 FEET TO AN INTERSECTION WITH A NON-TANGENT CURVE TO THE RIGHT AND THE EASTERLY RIGHT-OF-WAY LINE OF BEN HILL GRIFFIN PARKWAY (WIDTH VARIES) AS DESCRIBED IN OFFICIAL RECORDS BOOK 3207 AT PAGE 1910 OF SAID PUBLIC RECORDS OF LEE COUNTY HAVING A RADIUS OF 50.00 FEET AND TO WHICH POINT A RADIAL LINE BEARS S.78°44'52"W.; THENCE NORTHERLY ALONG SAID CURVE AND SAID EASTERLY LINE THROUGH A CENTRAL ANGLE OF 11°32'03" FOR 10.07 FEET; THENCE N.00°16'55"E. ALONG SAID EASTERLY LINE FOR 550.01 FEET; THENCE N.89°43'05"W. ALONG SAID EASTERLY LINE FOR 14.00 FEET; THENCE N.00°16'55"E. ALONG SAID EASTERLY LINE FOR 282.03 FEET TO THE BEGINNING OF A CURVE TO THE LEFT HAVING A RADIUS OF 6074.11 FEET; THENCE NORTHERLY ALONG SAID CURVE AND SAID EASTERLY LINE THROUGH A CENTRAL ANGLE OF 02°37'29.4" FOR 278.27 FEET TO THE SOUTHWEST CORNER OF LANDS DESCRIBED IN OFFICIAL RECORDS BOOK 3540, AT PAGES 150 AND 151 OF THE PUBLIC RECORDS OF SAID LEE COUNTY; THENCE S.89°42'55"E. ALONG SAID SOUTHERLY LINE FOR 416.89 FEET; THENCE N.32°01'35"E. ALONG SAID SOUTHERLY LINE FOR 309.16 FEET; THENCE N.00°17'05"E. ALONG SAID SOUTHERLY LINE FOR 404.68 FEET; THENCE N.32°01'35"E. ALONG SAID SOUTHERLY LINE FOR 302.93 FEET; THENCE S.89°42'55"E. ALONG SAID SOUTHERLY LINE FOR 288.43 FEET TO THE SOUTHEAST CORNER OF SAID LANDS; THENCE N.00°17'05"E. ALONG THE EAST LINE OF SAID LANDS FOR 1411.47 FEET; THENCE S.90°00'00"E. FOR 243.55 FEET TO THE BEGINNING OF A CURVE TO THE LEFT HAVING A RADIUS OF 360.00 FEET; THENCE NORTHEASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 64°34'42" FOR 405.76 FEET TO A POINT OF REVERSE CURVE HAVING A RADIUS OF 240.00 FEET; THENCE NORTHEASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 66°12'51" FOR 277.36 FEET; THENCE S.88°21'51"E. FOR 89.03 FEET TO THE BEGINNING OF A CURVE TO THE RIGHT HAVING A RADIUS OF 440.00 FEET; THENCE EASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 12°42'56"

SHEET 1 OF 3

FOR 97.65 FEET; THENCE S.75°38'54"E. FOR 256.32 FEET TO THE BEGINNING OF A CURVE TO THE LEFT HAVING A RADIUS OF 3060.00 FEET; THENCE EASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 14°21'05.5" FOR 766.47 FEET; THENCE S.90°00'00"E. FOR 3092.66 FEET TO THE BEGINNING OF A CURVE TO THE RIGHT HAVING A RADIUS OF 1440.00 FEET; THENCE EASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 16°46'25" FOR 421.57 FEET TO A POINT OF REVERSE CURVE HAVING A RADIUS OF 1560.00 FEET; THENCE EASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 22°22'29" FOR 609.20 FEET TO A POINT OF REVERSE CURVE HAVING A RADIUS OF 2440.00 FEET; THENCE EASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 26°10'24.4" FOR 1114.62 FEET TO A POINT OF REVERSE CURVE HAVING A RADIUS OF 410.00 FEET; THENCE EASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 20°34'20" FOR 147.21 FEET; THENCE S.90°00'00"E. FOR 135.80 FEET TO THE POINT OF BEGINNING.


PARCEL CONTAINS 717.69 ACRES MORE OR LESS

SUBJECT TO EASEMENTS, RESTRICTIONS, RESERVATIONS AND RIGHTS-OF-WAY OF RECORD.

SUBJECT TO FACTS THAT MAY BE REVEALED BY AN ACCURATE BOUNDARY SURVEY.

BEARINGS ARE BASED ON THE EAST LINE OF THE SOUTHEAST QUARTER OF SECTION 1, TOWNSHIP 46 SOUTH, RANGE 25 EAST, LEE COUNTY FLORIDA AS BEARING S.00°54'31"E.

DESCRIPTION PREPARED 09-17-03.


THOMAS R. LEHNBERT, JR., P.S.M.
FLORIDA CERTIFICATION NO. 5541

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Exhibit "A" - Easement Parcel B

Marks Engineering, Inc.Professional Engineers, Planners & Land Surveyors
FORT MYERS + NAPLES + SARASOTA

DESCRIPTION
OF A
PARCEL OF LAND
LYING IN
SECTION 1 AND 2, TOWNSHIP 46 SOUTH, RANGE 25 EAST
AND
SECTION 6, TOWNSHIP 46 SOUTH, RANGE 26 EAST
LEE COUNTY, FLORIDA

(EAST WEST RIGHT-OF-WAY)

A TRACT OR PARCEL OF LAND SITUATED IN THE STATE OF FLORIDA, COUNTY OF LEE, LYING IN SECTION 1 AND 2, TOWNSHIP 46 SOUTH, RANGE 25 EAST, AND SECTION 6, TOWNSHIP 46 SOUTH, RANGE 26 EAST OF SAID LEE COUNTY, FLORIDA, BEING FURTHER DESCRIBED AS FOLLOWS:

COMMENCING AT THE NORTHWEST CORNER OF SAID SECTION 1; THENCE S.01°02'59"E. ALONG THE WEST LINE OF THE NORTHWEST QUARTER OF SAID SECTION FOR 2790.90 FEET TO THE POINT OF BEGINNING; THENCE S.90°00'00"E. FOR 2894.61 FEET TO THE BEGINNING OF A CURVE TO THE RIGHT HAVING A RADIUS OF 1560.00 FEET; THENCE EASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 16°46'25" FOR 456.70 FEET TO A POINT OF REVERSE CURVE HAVING A RADIUS OF 1440.00 FEET; THENCE EASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 22°22'29" FOR 562.34 FEET TO A POINT OF REVERSE CURVE HAVING A RADIUS OF 2560.00 FEET; THENCE EASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 26°10'24.4" FOR 1169.44 FEET TO A POINT OF REVERSE CURVE HAVING A RADIUS OF 290.00 FEET; THENCE EASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 20°34'20" FOR 104.13 FEET; THENCE S.90°00'00"E. FOR 898.20 FEET TO THE BEGINNING OF A CURVE TO THE LEFT HAVING A RADIUS OF 50.00 FEET; THENCE NORTHEASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 90°54'31" FOR 79.33 FEET TO AN INTERSECTION WITH THE WEST LINE OF A ROADWAY AND PUBLIC UTILITY RIGHT-OF-WAY AS DESCRIBED IN OFFICIAL RECORDS BOOK 1398, AT PAGE 2147 OF THE PUBLIC RECORDS OF SAID LEE COUNTY, FLORIDA; THENCE S.00°54'31"E. ALONG SAID WEST LINE FOR 220.03 FEET TO A POINT OF CURVE, TO WHICH POINT A RADIAL LINE BEARS N.89°05'29"E.; THENCE NORTHWESTERLY ALONG A CURVE TO THE LEFT HAVING A RADIUS OF 50.00 FEET; THROUGH A CENTRAL ANGLE OF 89°05'29" FOR 77.75 FEET; THENCE N.90°00'00"W. FOR 901.69 FEET TO THE BEGINNING OF A CURVE TO THE RIGHT HAVING A RADIUS OF 410.00 FEET; THENCE WESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 20°34'20" FOR 147.21 FEET TO A POINT OF REVERSE CURVE HAVING A RADIUS OF 2440.00 FEET; THENCE WESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 26°10'24.4" FOR 1114.62 FEET TO A POINT OF REVERSE CURVE HAVING A RADIUS OF 1560.00 FEET; THENCE WESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 22°22'29" FOR 609.20 FEET TO A POINT OF REVERSE CURVE HAVING A RADIUS OF 1440.00 FEET; THENCE WESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 16°46'25" FOR 421.57 FEET; THENCE N.90°00'00"W. FOR 3092.66 FEET TO THE BEGINNING OF A CURVE TO THE RIGHT HAVING A RADIUS OF 3060.00 FEET; THENCE WESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 14°21'05.5" FOR 766.47 FEET; THENCE N.75°38'54"W. FOR 256.32 FEET TO THE BEGINNING OF A CURVE TO THE LEFT HAVING A RADIUS OF 440.00 FEET; THENCE WESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 12°42'56" FOR 97.65 FEET; THENCE N.88°21'51"W. FOR 89.03 FEET TO THE BEGINNING OF A CURVE TO THE LEFT HAVING A RADIUS OF 240.00 FEET; THENCE SOUTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 66°12'51" FOR 277.36 FEET TO A POINT OF REVERSE CURVE HAVING A RADIUS OF 360.00 FEET; THENCE SOUTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 64°34'42" FOR 405.76 FEET; THENCE N.90°00'00"W. FOR 243.55 FEET; THENCE N.00°17'05"E. FOR 120.00 FEET; THENCE S.90°00'00"E. FOR 242.95 FEET TO THE BEGINNING OF A CURVE TO THE LEFT HAVING A RADIUS OF 240.00 FEET; THENCE NORTHEASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 64°34'42" FOR 270.51 FEET TO A POINT OF REVERSE CURVE HAVING A RADIUS OF 360.00 FEET; THENCE NORTHEASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 66°12'51" FOR 416.04 FEET; THENCE S.88°21'51"E. FOR 89.03 FEET TO THE BEGINNING OF A

SHEET 1 OF 3

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Official Records BK 03544 PG 4185


CURVE TO THE RIGHT HAVING A RADIUS OF 560.00 FEET; THENCE EASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 12°42'56" FOR 124.28 FEET; THENCE S.75°38'54"E. FOR 256.32 FEET TO THE BEGINNING OF A CURVE TO THE LEFT HAVING A RADIUS OF 2940.00 FEET; THENCE EASTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 14°27'05.5" FOR 736.42 FEET; THENCE S.90°00'00"E. FOR 198.05 FEET TO THE POINT OF BEGINNING.

SUBJECT TO EASEMENTS, RESTRICTIONS, RESERVATIONS AND RIGHTS-OF-WAY OF RECORD.

SUBJECT TO FACTS THAT MAY BE REVEALED BY AN ACCURATE BOUNDARY SURVEY.

ASSUMED NORTH BASED ON THE WEST LINE OF THE NORTHWEST QUARTER OF SECTION 1, TOWNSHIP 46 SOUTH, RANGE 25 EAST, AS BEARING S.01°02'59"E.

DESCRIPTION PREPARED 04-07-03

 4/17/03
THOMAS R. LEHNERT, JR., P.S.M.
FLORIDA CERTIFICATION NO. 5541

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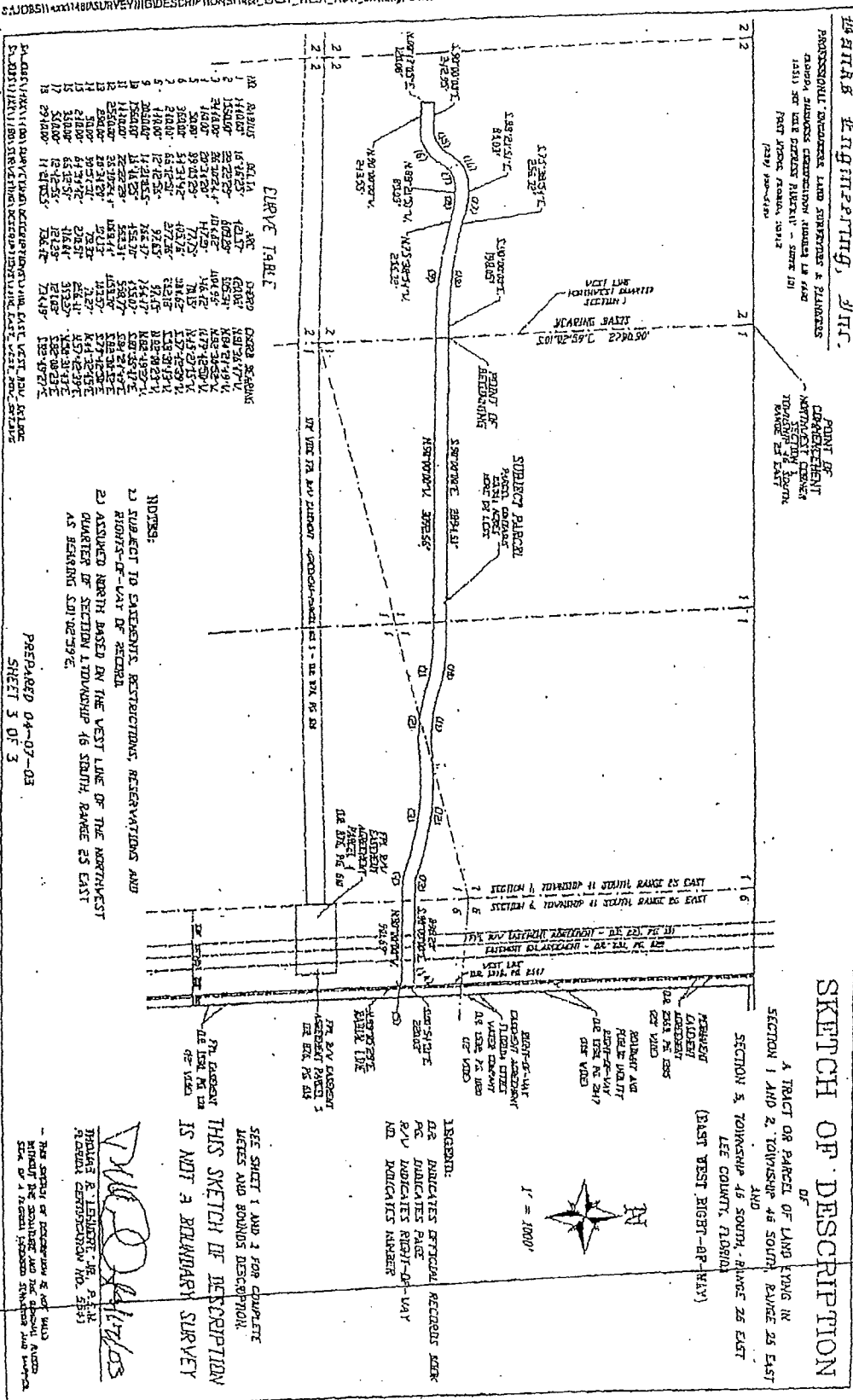


Exhibit "A" - Parcel C

Banks Engineering, Inc.Professional Engineers, Planners & Land Surveyors
FORT MYERS • NAPLES • SARASOTA

DESCRIPTION
OF A
PARCEL OF LAND
LYING IN
SECTIONS 1 AND 2, TOWNSHIP 46 SOUTH, RANGE 25 EAST
LEE COUNTY, FLORIDA
(306.631 ACRE PARCEL)

A TRACT OR PARCEL OF LAND SITUATED IN THE STATE OF FLORIDA, COUNTY OF LEE, LYING IN SECTIONS 1 AND 2, TOWNSHIP 46 SOUTH, RANGE 25 EAST, OF SAID LEE COUNTY, FLORIDA, BEING FURTHER DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHWEST CORNER OF SAID SECTION 1 AND THE NORTHEAST CORNER OF SAID SECTION 2; THENCE N.89°08'21"E. ALONG THE NORTH LINE OF THE NORTHWEST QUARTER OF SAID SECTION 1 FOR 2642.98 FEET TO THE NORTHEAST CORNER OF SAID FRACTION; THENCE S.01°18'39"E. ALONG THE EAST LINE OF SAID FRACTION FOR 2830.87 FEET; THENCE N.90°00'00"W. FOR 2854.36 FEET TO THE BEGINNING OF A CURVE TO THE RIGHT HAVING A RADIUS OF 2940.00 FEET; THENCE WESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 14°21'06" FOR 736.42 FEET; THENCE N.75°38'54"W. FOR 256.32 FEET TO THE BEGINNING OF A CURVE TO THE LEFT HAVING A RADIUS OF 560.00 FEET; THENCE WESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 12°42'36" FOR 124.28 FEET; THENCE N.88°21'51"W. FOR 89.03 FEET TO THE BEGINNING OF A CURVE TO THE LEFT HAVING A RADIUS OF 360.00 FEET; THENCE SOUTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 66°12'51" FOR 416.04 FEET TO A POINT OF REVERSE CURVE HAVING A RADIUS OF 240.00 FEET; THENCE SOUTHWESTERLY ALONG SAID CURVE THROUGH A CENTRAL ANGLE OF 64°34'42" FOR 270.51 FEET; THENCE N.90°00'00"W. FOR 242.95 FEET; THENCE N.00°17'05"E. FOR 2933.27 FEET TO A POINT OF INTERSECTION WITH THE NORTH LINE OF THE NORTHEAST QUARTER OF SAID SECTION 2; THENCE N.89°20'21"E. ALONG SAID NORTH LINE FOR 2116.49 FEET TO THE POINT OF BEGINNING.

SUBJECT TO EASEMENTS, RESTRICTIONS, RESERVATIONS AND RIGHTS-OF-WAY OF RECORD.

SUBJECT TO FACTS THAT MAY BE REVEALED BY AN ACCURATE BOUNDARY SURVEY.

PARCEL CONTAINS 306.631 ACRES, MORE OR LESS.

ASSUMED NORTH BASED ON THE NORTH LINE OF THE NORTHWEST QUARTER OF SECTION 1, TOWNSHIP 46 SOUTH, RANGE 25 EAST, AS BEARING N.89°08'21"E.

DESCRIPTION PREPARED 04-15-03

THOMAS R. LEHNERT, JR. 4/17/03
THOMAS R. LEHNERT, JR., F.S.M.
FLORIDA CERTIFICATION NO. 5541

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SHEET 1 OF 2

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James Engineering, Inc.
PROFESSIONAL ENGINEERS, LAND SURVEYORS & PLANNERS
15511 25th AVE STESS PARKWAY - SUITE 101
POMEREO, FLORIDA 33062
(304) 830-5450

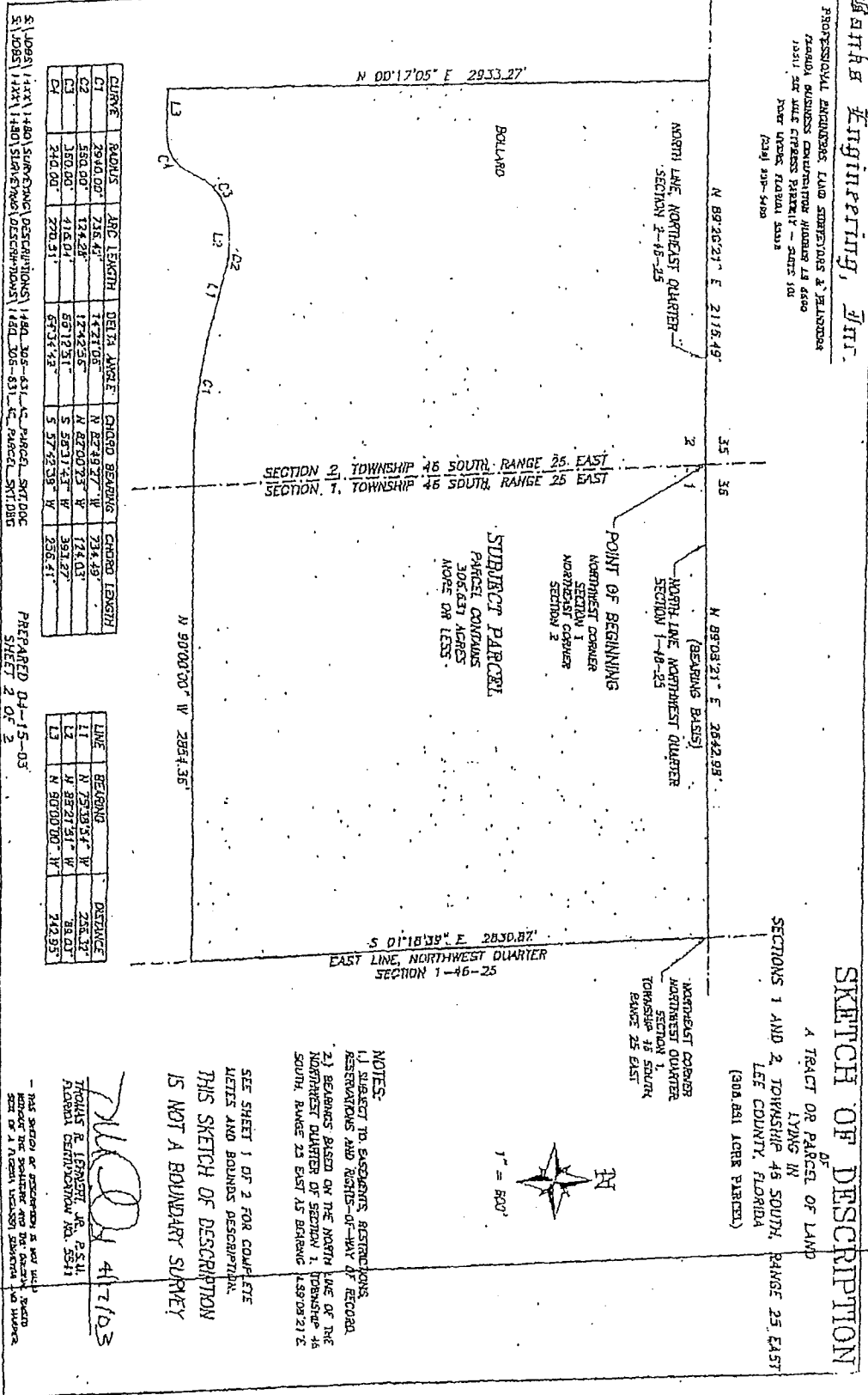


Exhibit IV.B.1
Traffic Study

FLORIDA GULF COAST
TECHNOLOGY AND RESEARCH PARK
COMPREHENSIVE PLAN AMENDMENT
TRAFFIC STUDY

Project #09617

January 11, 2010

Prepared by:
DAVID PLUMMER & ASSOCIATES, INC.
2271 McGregor Boulevard, Suite 200
Fort Myers, Florida 33901



FLORIDA GULF COAST
TECHNOLOGY AND RESEARCH PARK
COMPREHENSIVE PLAN AMENDMENT
TRAFFIC STUDY

Introduction

The commercial component of the larger Florida Gulf Coast Technology and Research Park (FGCTRP) is a proposed commercial development within unincorporated Lee County, hereafter referred to as the Property. The Property is located in the northeast quadrant of the Alico Road/Ben Hill Griffin Parkway intersection, Exhibit 1.

The Property is currently designated as Undeveloped Agricultural land use category within the existing Tradeport overlay. The proposed Comprehensive Plan Amendment (CPA) will allow approximately 700,000 square feet of commercial retail land uses on the Property.

The purpose of this report, therefore, is to provide a traffic study in support of the Comprehensive Plan Amendment (CPA) application.

Methodology Meeting

A meeting was held with the Lee County DOT staff on December 8, 2009 to discuss the traffic study in support of the Comprehensive Plan Amendment for the Property. As required and outlined in the Lee County Application for a Comprehensive Plan Amendment (Appendix A), the following was discussed and agreed upon during the methodology meeting.

- The proposed CPA will be limited to approximately 100 acres located in the northeast quadrant of the Alico Road/Ben Hill Griffin Parkway intersection.
- The proposed CPA will include approximately 700,000 square feet of commercial uses only. No other uses will be included as part of the CPA analysis.
- Any other land uses identified as part of the concurrent/on-going DRI application for the FGCTRP will be addressed through the submittal of the DRI sufficiency responses.
- The study area for the CPA analysis will include the roadway segments within a 3-mile radius from the property, consistent with Lee County requirements.
- The long-term horizon year analysis will be based on the Lee County MPO 2030 zonal data projections and the 2030 LRTP financially-feasible roadway network. The Lee County FSUTMS travel model will be run without and with the proposed Plan Amendment.
- The five-year horizon year (2014) analysis will reflect 350,000 square feet of commercial uses.
- The 2014 analysis will be based on the current E+C network and growth trends based on historic traffic counts. The travel model derived CPA volumes (trip

generation/distribution/assignment) will be added to the growth-trend derived background volumes to establish 2014 traffic conditions with the CPA.

- Based on the comparative analysis, improvements needed as a result of the proposed CPA will be identified under both long-term (2030) and five-year horizon (2014) conditions.

Existing Roadway Network

The existing roadway network in the vicinity of the Property is depicted in Exhibit 1. As shown in Exhibit 1, there are several major roadways serving the Property including Alico Road, Ben Hill Griffin Parkway and I-75.

Alico Road is a County-maintained six-lane, east-west arterial connecting US 41 to I-75 and Ben Hill Griffin Parkway. It becomes a two-lane road east of Ben Hill Griffin Parkway to Corkscrew Road, which connects to SR 82 in Collier County.

Ben Hill Griffin Parkway is a County-maintained four and six-lane, north-south arterial connecting several area attractions including the Miromar Outlets, Germain Arena, Florida Gulf Coast University, Gulf Coast Town Center and the Southwest Florida International Airport.

I-75 is a State-maintained freeway along the west coast of Florida connecting Naples, Fort Myers, Punta Gorda and Port Charlotte with Sarasota, Bradenton, and Tampa to the north. The section of I-75 from Golden Gate Parkway in Collier County to Colonial Boulevard in Lee County is currently under construction for six-lane widening, which is anticipated to be completed in the first quarter of 2010.

Other important roadways in the general vicinity of the Property include Three Oaks Parkway and Estero Parkway.

Scheduled Roadway Improvements

Scheduled road improvements in the Lee County Capital Improvement Program are shown on a map produced by the Lee County DOT and titled Major Road Improvements Programmed Through Construction Phase, F.Y. 2009/10 – 2013/14. This map is provided in Appendix B.

Some of the more important roadway projects in the general vicinity of the Property include the following.

- New four-lane Estero Parkway Extension from Three Oaks Parkway to Ben Hill Griffin Parkway – Recently Completed.
- Four-lane widening of Three Oaks Parkway from Corkscrew Road to Alico Road – Under Construction and nearing completion.
- Six-lane widening of I-75 from Colonial Boulevard to SR 82 – Fiscal Year 2009/2010.

- Alico-Green Meadows Corridor Study from Alico Road at Green Meadows Road to SR 82 – Under Study.
- CR 951 Extension PD&E study for new four-lane road from Immokalee Road in Collier County to Alico Road – Under Study.

In addition to the above, the Summary of Major Road Projects Programmed by Lee County – FY 09/10 to FY 13/14 (also included in Appendix B) identifies the new four-lane Three Oaks Parkway Extension from north of Alico Road to Daniels Parkway beyond the Five Year Work Program (for the six to ten year time period).

As mentioned in an earlier section of the report, the section of I-75 from Golden Gate Parkway in Collier County to Colonial Boulevard in Lee County is currently under construction for six-lane widening. This construction project is well ahead of schedule and will be completed in the first quarter of 2010.

Planned Roadway Improvements

The Lee County Metropolitan Planning Organization (MPO) developed the Lee County 2030 Long Range Transportation Plan (LRTP). The 2030 LRTP Highway Element Map is included in Appendix C. This map identifies improvements that are considered Financially Feasible Projects and improvements that are Contingent Upon Additional Funding.

The Financially Feasible Projects include those improvements that are considered affordable, given revenue projections through 2030. One of the critical Financially Feasible Projects in the general vicinity of the Property include the New I-75 Airport Interchange and Collector-Distributor road system.

The I-75 Airport Interchange and Collector-Distributor system between Alico Road and Daniels Parkway serves the Southwest Florida International Airport (SWFIA) via 2-lane collector-distributor roads on each side of I-75 from Alico Road to north of the Airport.

The I-75 Airport Interchange and Collector-Distributor system improvement was recently a programmed and “committed” improvement. However, due to the funding issues, it was recently removed from the Florida DOT Five Year Work Program. While not technically programmed as a “committed” improvement, it is a 2030 financially-feasible, priority improvement.

The improvements that are identified as Contingent Upon Additional Funding are those improvements that are found to be needed by 2030 but are not considered affordable, given revenue projections through 2030. The projects in the general vicinity of the Property that are identified as Contingent Upon Additional Funding include the following.

- New four-lane Alico Expressway from Summerlin Road to SR 82.
- CR 951 Extension as a new four-lane, limited access highway from the Collier County Line to the Alico Expressway.

- New interchange on CR 951 Extension at the Alico Expressway.
- Twelve-lane widening of I-75 from Bonita Beach Road to Alico Road.
- Ten-lane widening of I-75 from Alico Road to SR 82.
- Six-lane widening of Ben Hill Griffin Parkway from FGCU Boulevard to College Club Drive.
- Six-lane widening of Three Oaks Parkway from Coconut Road to Estero Parkway.

With regard to the Alico Expressway, DPA was advised previously by Lee County DOT Staff that, in lieu of the Alico Expressway, the LRTP is likely to be revised to include the widening of Alico Road east of Ben Hill Griffin Parkway plus an extension of Alico Road east and north to SR 82. In either case, this “contingent” improvement is not included in the roadway network used in this study because it is not considered financially-feasible at this time.

Land Use Assumptions

The land use projections used in the CPA traffic analysis are summarized below.

Land Use Assumptions⁽¹⁾

<u>Horizon Year</u>	<u>Land Use</u>	<u>Size</u>	<u>Units</u>
Short Term – Year 2014	Commercial	350,000	sq.ft.
Long Range – Year 2030 (Buildout)	Commercial	700,000	sq.ft.

Footnotes:

(1) Conservative estimates for analysis purposes.

As shown above, the proposed CPA will amend the Comprehensive Plan to add approximately 700,000 square feet of commercial retail uses at buildout. As presented and agreed in the methodology meeting, approximately 350,000 square feet of commercial retail uses were used in the short-term (five-year) analysis.

Property Access

The Property has frontage on both Alico Road and Ben Hill Griffin Parkway. Therefore, the Property will have access onto both Alico Road and Ben Hill Griffin Parkway.

Level of Service Standards

Roadway level of service (LOS) standards generally vary depending upon whether the road is a State or County road and whether the road is in an urban or rural area. Furthermore, State roads

on the Florida Intrastate Highway System (FIHS) generally have more stringent LOS standards than other roads.

DCA rules require that Florida DOT LOS standards, rather than local standards, apply on FIHS roads. For non-FIHS State roads and County roads, the LOS standards adopted in the local government comprehensive plans apply.

The LOS standard on I-75, which is on the State FIHS, is LOS “D”. For all the County roads, the adopted LOS standard is LOS “E”.

2030 Long Range Transportation Plan (LRTP) Analysis

DPA downloaded the latest 2030 Financially Feasible Plan travel model data from the MPO website for use in this study. The adopted Lee County MPO travel model was used to run comparative travel model assignments, both with and without the proposed CPA, under the adopted Lee County 2030 Financially-Feasible Plan. For these assignments, the future year 2030 road network included only projects identified as Financially Feasible in the MPO 2030 Highway Element. Therefore, the projects that were identified as needed but Contingent Upon Additional Funding were not included in the network.

After review, the following changes were made to the MPO adopted 2030 FSUTMS roadway network to correctly reflect the adopted 2030 Financially-Feasible Plan.

- The number of lanes on Ben Hill Griffin Parkway/Treeline Avenue was changed from six to four lanes between Alico Road and Daniels Parkway.
- The number of lanes on Corkscrew Road was changed from six to four lanes between Three Oaks Parkway and Ben Hill Griffin Parkway.

The Lee County MPO’s 2030 socioeconomic data projections were used for both of these travel model assignments. For the travel model assignment without the CPA, the MPO zonal data were used without revision.

For the travel model assignment with the proposed CPA, the socio-economic data associated with the proposed CPA were added to the MPO 2030 zonal data in the ZDATA2 file, representing Traffic Analysis Zone (TAZ) 1387.

2030 Traffic Conditions Without the CPA

As required by Lee County, the study area included roadway segments within a three-mile radius of the Property. Exhibit 2 provides the results of the 2030 travel model assignment without the proposed CPA. As expected, the following segments are projected to exceed the adopted level of service standard in 2030 without the proposed CPA.

Deficient Roadway Segments – 2030 Without CPA

<u>Roadway</u>	<u>From</u>	<u>To</u>
I-75	Corkscrew Road Alico Road	Alico Road Daniels Parkway
Ben Hill Griffin Parkway	Alico Road FGCTRP Entrance	FGCTRP Entrance Terminal Access Road
Treeline Avenue	Terminal Access Road	Daniels Parkway

The adopted MPO 2030 Plan identifies ten and twelve-lane widening of I-75 from Bonita Beach Road to SR 82 as needed but Contingent Upon Additional Funding. In addition, the MPO 2030 Plan identifies the new four-lane extension of CR 951 from Collier County Line to Alico Expressway. There are no improvements identified in the MPO 2030 Plan for Ben Hill Griffin Parkway/Treeline Avenue between Alico Road and Daniels Parkway, apparently because the widening of this road is not anticipated to be needed once I-75 is widened to ten/twelve lanes.

Since the proposed CPA was not reflected in the MPO 2030 LRTP, these improvements will be needed whether or not there is development as part of the proposed CPA.

2030 Traffic Conditions with the CPA

Exhibit 3 provides the results of the 2030 travel model assignment with the proposed CPA.

In this travel model assignment, the CPA generates approximately 17,800 peak season, weekday daily trips (PSWDT). As identified below, the 2030 travel model assignment with the proposed CPA resulted in the same deficient roadway segments that were identified as deficient without the CPA.

Deficient Roadway Segments – 2030 With CPA

<u>Roadway</u>	<u>From</u>	<u>To</u>
I-75	Corkscrew Road Alico Road	Alico Road Daniels Parkway
Ben Hill Griffin Parkway	Alico Road FGCTRP Entrance	FGCTRP Entrance Terminal Access Road
Treeline Avenue	Terminal Access Road	Daniels Parkway

Since the same roadway deficiencies were identified both without and with the proposed CPA, those deficiencies are not as a result of the proposed CPA. Therefore, the CPA is not responsible for funding these improvements which are needed whether or not the CPA is approved.

Traffic Mitigation

It is anticipated that the proposed CPA will mitigate its external transportation impacts through the payment of roads impact fees, in accordance with Lee County's roads impact fee ordinance, plus other revenues, such as ad valorem taxes, gas taxes, sales taxes and the like. DPA has estimated that the proposed CPA would generate approximately \$7.7 million in roads impact fees, based on the current Lee County roads impact fee schedule, Exhibit 4.

These roads impact fee payments can be used by the County to fund whatever road improvements are found to be necessary to support general growth in the area, including this CPA. Specifically, the roads impact fees can be used towards the Ben Hill Griffin Parkway/Treeline Avenue widening or other improvements as needed. As stated previously, the I-75 and Ben Hill Griffin Parkway/Treeline Avenue improvements will be needed whether or not the proposed CPA is developed.

In this traffic assessment, the proposed CPA has been assumed to be new development from a traffic standpoint. Particularly, the MPO 2030 zonal data projections (used in the 2030 Financially Feasible Plan) did not include the proposed commercial land uses and there has been no re-allocation of commercial uses from elsewhere in Lee County to the proposed CPA. As a result, the traffic from the proposed CPA has been treated as additional traffic beyond the traffic projections used in the development of the adopted MPO 2030 Financially-Feasible Plan.

For consistency, the roads impact fees collected from the proposed CPA, which will be paid specifically to mitigate the traffic impacts of this new development, must be considered new funds beyond those that were considered in the development of the adopted 2030 Financially-Feasible Plan. This would also apply to the ad valorem taxes, gas taxes, sales taxes and other revenues generated by the proposed CPA.

Development within the CPA will be responsible for providing site-related improvements within the development and at the development's entrances, including turn lanes and signalization, as needed.

Timing of Improvements

Any development as part of the proposed CPA will be subject to review and approval. Detailed DRI or rezoning traffic studies will be required and, if necessary, conditions of approval will be established before such approval would be granted. Therefore, the actual timing of the identified improvements will be established during the review and approval of specific development plans.

2014 Short Range (Capital Improvement Program) Analysis

As discussed and agreed in the methodology meeting, a short-range analysis was performed in addition to the 2030 LRTP analysis. The purpose of the short-range analysis is to identify the additional improvements needed on the roadway network beyond those programmed in the short-range (five-year) horizon due to the proposed development.

The short-range analysis was performed coincident with the current Lee County Capital Improvement Program (CIP) horizon year of 2014, using the current existing network plus improvements scheduled in the 5-year CIP or FDOT Work Program and, reflecting approximately 350,000 square feet of commercial retail land uses.

The Lee County MPO socio-economic data used in developing the LRTP are not reflective of the current economic downturn. As explained and agreed upon during the methodology meeting, historic traffic growth rates, which are more appropriate for short-range projections, were used to develop the 2014 background traffic. The calculation of historic growth rates is documented in Appendix D.

2014 Traffic Conditions Without the CPA

The future (2014) traffic projections, without the proposed CPA, are presented in Exhibit 5.

As shown in Exhibit 5, all the study area roadway segments are anticipated to operate at or better than the adopted LOS standard in 2014.

2014 Traffic Conditions With CPA

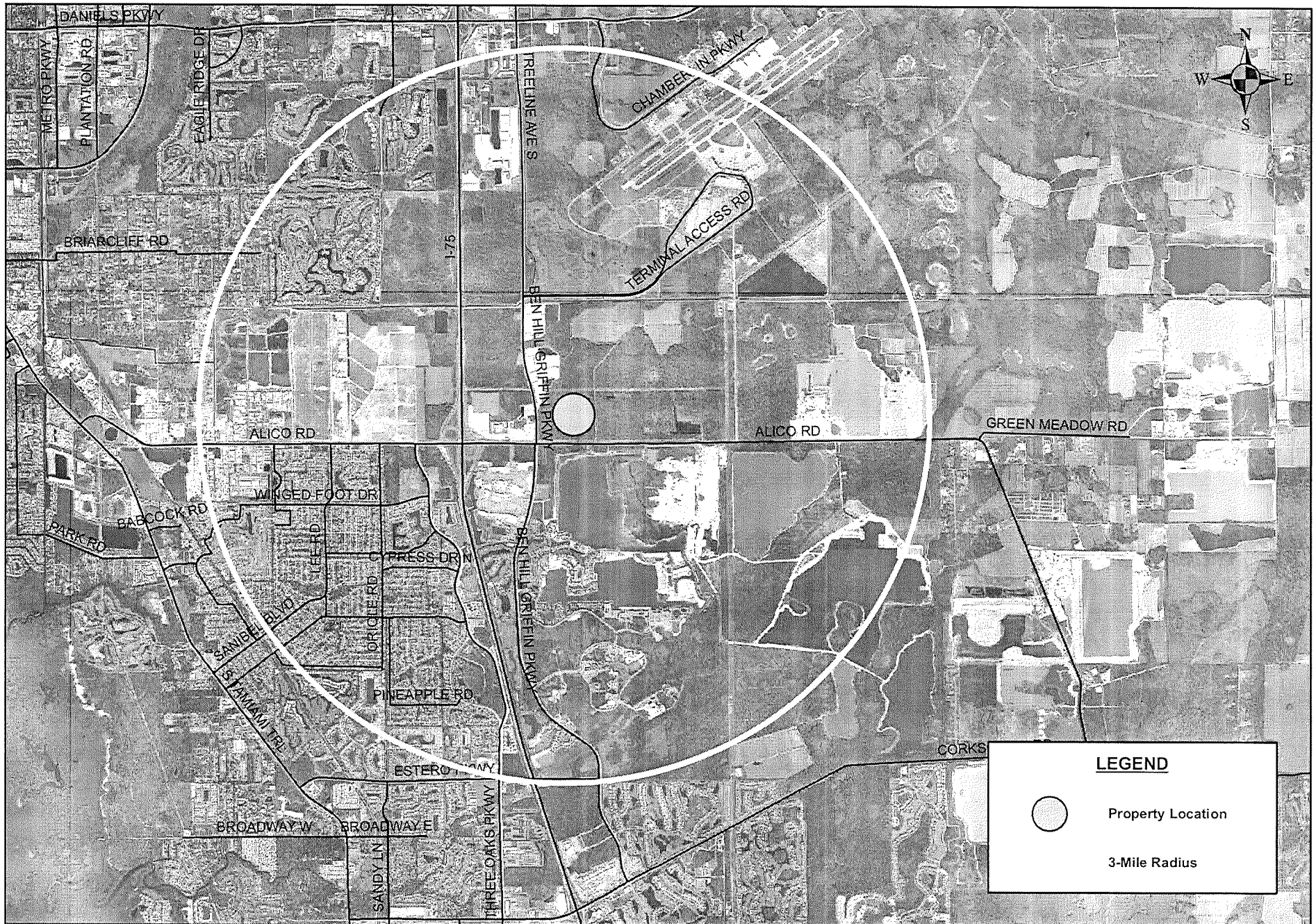
As agreed in the methodology meeting, current Lee County E+C travel model was used to derive the proposed CPA volumes (trip generation/distribution/assignment) associated with approximately 350,000 square feet of commercial retail uses. The travel model derived CPA volumes were then added to the projected 2014 background traffic volumes to derive the future (2014) traffic volumes, with the proposed CPA, Exhibit 6.

As shown in Exhibit 6, all the study area roadway segments continue to operate at or better than adopted LOS standard, with the CPA. Therefore, it is concluded that no additional improvements are needed on the roadway network beyond those programmed in the short-range (five-year) horizon due to the proposed development.

Traffic Mitigation

DPA has estimated that the proposed CPA would generate approximately \$3.8 million in roads impact fees corresponding to the 350,000 square feet of commercial retail uses, Exhibit 7. These

roads impact fee payments can be used by the County to fund whatever road improvements are found to be necessary to support general growth in the area, including this CPA.



LEGEND



Property Location

3-Mile Radius



0 2,500 5,000 10,000 Feet

FLORIDA GULF COAST TECHNOLOGY & RESEARCH PARK
COMPREHENSIVE PLAN AMENDMENT TRAFFIC STUDY

PROPERTY LOCATION
AND STUDY AREA

09617/01A/1209

1

EXHIBIT 2

FLORIDA GULF COAST TECHNOLOGY AND RESEARCH PARK
COMPREHENSIVE PLAN AMENDMENT TRAFFIC STUDY, #09617
FUTURE 2030 TRAFFIC CONDITIONS WITHOUT CPA
DIRECTIONAL PEAK HOUR (K100), PEAK SEASON

		(6)										(2)												
		FSUTMS (7)										Directional Service Volumes												
		(1) (3)		PSWDT		PSWDT		(5) Two-Way		(5) Directional		LOS "C"		LOS "D"		LOS "E"		LOS		V/C		LOS		
ROADWAY	FROM	TO	# of Lanes	LOS	(4) PCS #	Without CPA	/AADT Factor	Existing AADT	K100 Factor	Peak Hr. Volume	D100 NE	SW	Peak Hr. Vol. NE	SW	LOS "C" NE	SW	LOS "D" NE	SW	LOS "E" NE	SW	LOS NE	SW	LOS NE	SW
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
ALICO ROAD	DUSTY ROAD	LEE ROAD	6	E	15	59,606	1.333	44,716	0.0958	4,284	0.5000	0.5000	2,142	2,142	2,870	2,960	2,960	2,960	0.72	0.72	B	B		
	LEE RD	THREE OAKS PKWY	6	E	15	52,254	1.333	39,200	0.0958	3,755	0.5000	0.5000	1,878	1,877	2,870	2,960	2,960	2,960	0.63	0.63	B	B		
	THREE OAKS PKWY	I-75	6	E	15	74,360	1.333	55,784	0.0958	5,344	0.5000	0.5000	2,672	2,672	2,870	2,960	2,960	2,960	0.90	0.90	C	C		
	I-75	BEN HILL GRIFFIN PKWY	6	E	15	53,284	1.333	39,973	0.0958	3,829	0.5000	0.5000	1,915	1,914	2,870	2,960	2,960	2,960	0.65	0.65	B	B		
	BEN HILL GRIFFIN PKWY	FGCTRP ENTRANCE	2	E	15	10,002	1.333	7,503	0.0958	719	0.5000	0.5000	360	359	720	880	920	920	0.39	0.39	C	C		
	FGCTRP ENTRANCE	GREEN MEADOW RD	2	E	15	7,699	1.333	5,776	0.0958	553	0.5000	0.5000	277	276	720	880	920	920	0.30	0.30	C	C		
BEN HILL GRIFFIN PKWY	ESTERO PKWY	FGCU ENTRANCE	4	E	60	37,220	1.287	28,920	0.0972	2,811	0.5200	0.4800	1,462	1,349	1,970	1,970	2,040	2,040	0.72	0.66	B	B		
	FGCU ENTRANCE	COLLEGE CLUB DR	4	E	60	46,022	1.287	35,759	0.0972	3,476	0.5200	0.4800	1,808	1,668	1,970	1,970	2,040	2,040	0.89	0.82	B	B		
	COLLEGE CLUB DR	ALICO ROAD	6	E	60	52,532	1.287	40,817	0.0972	3,967	0.5200	0.4800	2,063	1,904	2,970	3,070	3,070	3,070	0.67	0.62	B	B		
	ALICO RD	FGCTRP ENTRANCE	4	E	60	55,536	1.287	43,152	0.0972	4,194	0.5200	0.4800	2,181	2,013	1,970	2,040	2,040	2,040	1.07	0.99	F	D		
	FGCTRP ENTRANCE	TERMINAL ACCESS RD	4	E	60	57,970	1.287	45,043	0.0972	4,378	0.5200	0.4800	2,277	2,101	1,970	2,040	2,040	2,040	1.12	1.03	F	F		
ESTERO PARKWAY	THREE OAKS PKWY	BEN HILL GRIFFIN PKWY	4	E	25	29,592	1.167	25,357	0.0925	2,346	0.5200	0.4800	1,220	1,126	1,900	1,970	1,970	1,970	0.62	0.57	B	B		
I-75	CORKSCREW RD	ALICO RD	6	D	FDOT	161,322	1.099	146,790	0.0907	13,310	0.5579	0.4421	7,426	5,884	4,580	5,580	6,200	5,580	1.33	1.05	F	E		
	ALICO RD	DANIELS PKWY	6	D	FDOT	142,666	1.099	129,814	0.0907	11,770	0.5579	0.4421	6,566	5,204	4,580	5,580	6,200	5,580	1.18	0.93	F	D		
THREE OAKS PARKWAY	ESTERO PKWY	SAN CARLOS BLVD	4	E	25	28,001	1.167	23,994	0.0925	2,219	0.5200	0.4800	1,154	1,065	1,900	1,970	1,970	1,970	0.59	0.54	B	B		
	SAN CARLOS BLVD	ALICO RD	4	E	25	28,254	1.167	24,211	0.0925	2,239	0.5200	0.4800	1,164	1,075	1,900	1,970	1,970	1,970	0.59	0.55	B	B		
	ALICO RD	DANIELS PKWY	4	E	25	32,778	1.167	28,087	0.0925	2,598	0.5200	0.4800	1,351	1,247	1,900	1,970	1,970	1,970	0.69	0.63	B	B		
TREELINE AVENUE	TERMINAL ACCESS RD	DANIELS PKWY	4	E	61	56,708	1.237	45,843	0.0930	4,263	0.5100	0.4900	2,174	2,089	1,970	2,040	2,040	2,040	1.07	1.02	F	F		

Footnotes:

- (1) 2030 financially-feasible number of lanes.
- (2) Lee County Generalized Service Volumes (January, 2009). FDOT Generalized Service Volumes for I-75.
- (3) Lee County roadway LOS standard. I-75 based on FDOT FHHS LOS standard.
- (4) Based on Lee County 2008 Traffic Count Report. I-75 based on FDOT 2008 AADT traffic information.
- (5) Adjustment factors based on Lee County 2008 Traffic Count Report. I-75 based on FDOT 2008 traffic information.
- (6) Peak season traffic volumes based on FSUTMS travel model assignment.
- (7) PSADT/AADT factor based on Lee County 2008 permanent count station data. I-75 based on Lee Countywide PSF from FDOT data.

EXHIBIT 3

FLORIDA GULF COAST TECHNOLOGY AND RESEARCH PARK
COMPREHENSIVE PLAN AMENDMENT TRAFFIC STUDY, #09617

FUTURE 2030 TRAFFIC CONDITIONS WITH CPA

DIRECTIONAL PEAK HOUR (K100), PEAK SEASON

(6)																(2)											
FSUTMS (7)																Directional Service Volumes											
																(5) Two-Way				(5) Directional							
																D100		Peak Hr. Vol.		LOS "C" LOS "D" LOS "E"		LOS		V/C		LOS	
ROADWAY	FROM	TO	# of Lanes	LOS	Std PCS #	With AADT	PSWDT CPA	PSWDT Factor	Existing AADT	K100 Factor	Peak Hr. Volume	NE	SW	NE	SW	LOS "C"	LOS "D"	LOS "E"	LOS	Std	NE	SW	NE	SW			
=====																											
ALICO ROAD	DUSTY ROAD	LEE RD	6	E	15		60,256	1.333	45,203	0.0958	4,330	0.5000	0.5000	2,165	2,165	2,870	2,960	2,960	2,960	0.73	0.73	B	B				
	LEE RD	THREE OAKS PKWY	6	E	15		63,410	1.333	47,569	0.0958	4,557	0.5000	0.5000	2,279	2,278	2,870	2,960	2,960	2,960	0.77	0.77	B	B				
	THREE OAKS PKWY	I-75	6	E	15		73,397	1.333	55,062	0.0958	5,275	0.5000	0.5000	2,638	2,637	2,870	2,960	2,960	2,960	0.89	0.89	C	C				
	I-75	BEN HILL GRIFFIN PKWY	6	E	15		57,106	1.333	42,840	0.0958	4,104	0.5000	0.5000	2,052	2,052	2,870	2,960	2,960	2,960	0.69	0.69	B	B				
	BEN HILL GRIFFIN PKWY	FGCTRP ENTRANCE	2	E	15		20,223	1.333	15,171	0.0958	1,453	0.5000	0.5000	727	726	720	880	920	920	0.79	0.79	D	D				
	FGCTRP ENTRANCE	GREEN MEADOW RD	2	E	15		6,228	1.333	4,672	0.0958	448	0.5000	0.5000	224	224	720	880	920	920	0.24	0.24	C	C				
BEN HILL GRIFFIN PKWY	ESTERO PKWY	FGCU ENTRANCE	4	E	60		38,186	1.287	29,671	0.0972	2,884	0.5200	0.4800	1,500	1,384	1,970	1,970	2,040	2,040	0.74	0.68	B	B				
	FGCU ENTRANCE	COLLEGE CLUB DR	4	E	60		47,363	1.287	36,801	0.0972	3,577	0.5200	0.4800	1,860	1,717	1,970	1,970	2,040	2,040	0.91	0.84	B	B				
	COLLEGE CLUB DR	ALICO ROAD	6	E	60		53,969	1.287	41,934	0.0972	4,076	0.5200	0.4800	2,120	1,956	2,970	3,070	3,070	3,070	0.69	0.64	B	B				
	ALICO RD	FGCTRP ENTRANCE	4	E	60		51,989	1.287	40,395	0.0972	3,926	0.5200	0.4800	2,042	1,884	1,970	2,040	2,040	2,040	1.00	0.92	F	C				
	FGCTRP ENTRANCE	TERMINAL ACCESS RD	4	E	60		59,763	1.287	46,436	0.0972	4,514	0.5200	0.4800	2,347	2,167	1,970	2,040	2,040	2,040	1.15	1.06	F	F				
ESTERO PARKWAY	THREE OAKS PKWY	BEN HILL GRIFFIN PKWY	4	E	25		31,477	1.167	26,973	0.0925	2,495	0.5200	0.4800	1,297	1,198	1,900	1,970	1,970	1,970	0.66	0.61	B	B				
I-75	CORKSCREW RD	ALICO RD	6	D	FDOT		162,697	1.099	148,041	0.0907	13,430	0.5579	0.4421	7,493	5,937	4,580	5,580	6,200	5,580	1.34	1.06	F	E				
	ALICO RD	DANIELS PKWY	6	D	FDOT		143,981	1.099	131,011	0.0907	11,880	0.5579	0.4421	6,628	5,252	4,580	5,580	6,200	5,580	1.19	0.94	F	D				
THREE OAKS PARKWAY	ESTERO PKWY	SAN CARLOS BLVD	4	E	25		30,386	1.167	26,038	0.0925	2,408	0.5200	0.4800	1,252	1,156	1,900	1,970	1,970	1,970	0.64	0.59	B	B				
	SAN CARLOS BLVD	ALICO RD	4	E	25		30,781	1.167	26,376	0.0925	2,440	0.5200	0.4800	1,269	1,171	1,900	1,970	1,970	1,970	0.64	0.59	B	B				
	ALICO RD	DANIELS PKWY	4	E	25		36,209	1.167	31,027	0.0925	2,870	0.5200	0.4800	1,492	1,378	1,900	1,970	1,970	1,970	0.76	0.70	B	B				
TREELINE AVENUE	TERMINAL ACCESS RD	DANIELS PKWY	4	E	61		58,546	1.237	47,329	0.0930	4,402	0.5100	0.4900	2,245	2,157	1,970	2,040	2,040	2,040	1.10	1.06	F	F				

Footnotes:

- (1) 2030 financially-feasible number of lanes.
- (2) Lee County Generalized Service Volumes (January, 2009). FDOT Generalized Service Volumes for I-75.
- (3) Lee County roadway LOS standard. I-75 based on FDOT FHHS LOS standard.
- (4) Based on Lee County 2008 Traffic Count Report. I-75 based on FDOT 2008 AADT traffic information.
- (5) Adjustment factors based on Lee County 2008 Traffic Count Report. I-75 based on FDOT 2008 traffic information.
- (6) Peak season traffic volumes based on FSUTMS travel model assignment.
- (7) PSADT/AADT factor based on Lee County 2008 permanent count station data. I-75 based on Lee Countywide PSF from FDOT data.

EXHIBIT 4
 FLORIDA GULF COAST TECHNOLOGY AND RESEARCH PARK
 COMPREHENSIVE PLAN AMEDMENT TRAFFIC STUDY, #09617
 ROADS IMPACT FEE ASSESSMENT - BUILDOUT

		(1)	
	<u>Size</u>	<u>Fee Rate /Unit</u>	<u>Amount</u>
Residential:	Single-Family - Detached	0	\$8,976 /d.u.
	Multiple Family Building	0	\$6,297 /d.u.
	Duplex/Two-Family/Townhouse	0	\$6,297 /d.u.
	Hotel / Motel Room/Time-share	0	\$5,172 /room
	Mobile Home	0	\$4,686 /d.u.
	Elder /Disabled Housing	0	\$3,261 /site
	Adult Cong. Living Facility (ACLF)	0	\$2,025 /d.u.
	Recreational Vehicle Site	0	\$4,686 /site
Office:	General Office	0	\$7,305 /1,000 s.f.
	Medical Office	0	\$24,126 /1,000 s.f.
	Hospital	0	\$11,736 /1,000 s.f.
	Nursing Home	0	\$4,071 /1,000 s.f.
	Church	0	\$4,575 /1,000 s.f.
	Day Care Center	0	\$12,840 /1,000 s.f.
	Elementary / Sec. School (Private)	0	\$2,223 /1,000 s.f.
Industrial:	Industrial Park	0	\$6,195 /1,000 s.f.
	Warehouse	0	\$4,416 /1,000 s.f.
	Mini-Warehouse	0	\$1,587 /1,000 s.f.
	Mine	0	\$1,587 /Cubic Yard
Retail: (GFA)	Shopping Center	700,000	\$10,983 /1,000 s.f.
	Bank	0	\$25,134 /1,000 s.f.
	Car Wash, Self Service	0	\$5,262 /Stall
	Convenience Store w/Gas Sales	0	\$40,305 /1,000 s.f.
	Golf Course (open to public)	0	\$2,697 /acre
	Movie Theater	0	\$23,220 /1,000 s.f.
	Restaurant, Fast Food	0	\$44,337 /1,000 s.f.
	Restaurant, Standard	0	\$20,337 /1,000 s.f.

\$7,688,100

Footnotes:

(1) Based on the adopted Lee County Ordinance 08-24, Roads Impact Fee Schedule.

EXHIBIT 5
 FLORIDA GULF COAST TECHNOLOGY AND RESEARCH PARK
 COMPREHENSIVE PLAN AMENDMENT TRAFFIC STUDY, #09617
 FUTURE 2014 TRAFFIC CONDITIONS WITHOUT CPA
 DIRECTIONAL PEAK HOUR (K100), PEAK SEASON

ROADWAY	FROM	TO	(1)		(2)	(3)	(4)	(5)	(6)		2014										(7)							
			# of	LOS	(3)	2008	Annual	2014	2014	CPA	2014	(3)	Two-Way	(3)	Directional	Directional Service Volumes				LOS				V/C				
			Lanes	Std	PCS #	AADT	Rate	Factor	AADT	PSWDT	AADT	Factor	Volume	Dir 1	Dir 2	Dir 1	Dir 2	LOS "C"	LOS "D"	LOS "E"	Std	Dir 1	Dir 2	Dir 1	Dir 2			
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====				
ALICO ROAD	DUSTY ROAD	LEE RD	6	E	15	18,100	4.36%	1.29	23,382	0	23,382	0.0958	2,240	0.5000	0.5000	1,120	1,120	2,870	2,960	2,960	2,960	0.38	0.38	B	B			
	LEE RD	THREE OAKS PKWY	6	E	15	20,100	4.36%	1.29	25,966	0	25,966	0.0958	2,488	0.5000	0.5000	1,244	1,244	2,870	2,960	2,960	2,960	0.42	0.42	B	B			
	THREE OAKS PKWY	I-75	6	E	15	20,300	4.36%	1.29	36,559	0	36,559	0.0958	3,502	0.5000	0.5000	1,751	1,751	2,870	2,960	2,960	2,960	0.59	0.59	B	B			
	I-75	BEN HILL GRIFFIN PKWY	6	E	15	12,300	4.36%	1.29	15,889	0	15,889	0.0958	1,522	0.5000	0.5000	761	761	2,870	2,960	2,960	2,960	0.26	0.26	B	B			
	BEN HILL GRIFFIN PKWY	FGCTRP ENTRANCE	2	E	15	5,800	2.00%	1.13	6,532	0	6,532	0.0958	626	0.5000	0.5000	313	313	720	880	920	920	0.34	0.34	C	C			
	FGCTRP ENTRANCE	GREEN MEADOW RD	2	E	15	5,800	2.00%	1.13	6,532	0	6,532	0.0958	626	0.5000	0.5000	313	313	720	880	920	920	0.34	0.34	C	C			
BEN HILL GRIFFIN PKWY	ESTERO PKWY	FGCU ENTRANCE	4	E	60	20,300	4.36%	1.29	26,224	0	26,224	0.0972	2,549	0.5200	0.4800	1,325	1,224	1,970	1,970	2,040	2,040	0.65	0.60	B	B			
	FGCU ENTRANCE	COLLEGE CLUB DR	4	E	60	21,200	4.36%	1.29	27,387	0	27,387	0.0972	2,662	0.5200	0.4800	1,384	1,278	1,970	1,970	2,040	2,040	0.68	0.63	B	B			
	COLLEGE CLUB DR	ALICO ROAD	6	E	60	21,200	4.36%	1.29	27,387	0	27,387	0.0972	2,662	0.5200	0.4800	1,384	1,278	2,970	3,070	3,070	3,070	0.45	0.42	B	B			
	ALICO RD	FGCTRP ENTRANCE	4	E	60	24,000	4.36%	1.29	31,004	0	31,004	0.0972	3,014	0.5200	0.4800	1,567	1,447	1,970	2,040	2,040	2,040	0.77	0.71	B	B			
	FGCTRP ENTRANCE	TERMINAL ACCESS RD	4	E	60	24,000	4.36%	1.29	31,004	0	31,004	0.0972	3,014	0.5200	0.4800	1,567	1,447	1,970	2,040	2,040	2,040	0.77	0.71	B	B			
ESTERO PARKWAY	THREE OAKS PKWY	BEN HILL GRIFFIN PKWY	4	E	25	8,940 (8)	4.36%	1.24	11,066	0	11,066	0.0925	1,024	0.5200	0.4800	532	492	1,900	1,970	1,970	1,970	0.27	0.25	B	B			
I-75	CORKSCREW RD	ALICO RD	6	D	FDOT	71,000	2.00%	1.13	79,958	0	79,958	0.0907	7,250	0.5579	0.4421	4,045	3,205	4,580	5,580	6,200	5,580	0.72	0.57	C	B			
	ALICO RD	DANIELS PKWY	6	D	FDOT	66,500	2.00%	1.13	74,890	0	74,890	0.0907	6,790	0.5579	0.4421	3,788	3,002	4,580	5,580	6,200	5,580	0.68	0.54	C	B			
THREE OAKS PARKWAY	ESTERO PKWY	SAN CARLOS BLVD	4	E	25	15,640 (8)	12.00%	1.76	27,563	0	27,563	0.0925	2,550	0.5200	0.4800	1,326	1,224	1,900	1,970	1,970	1,970	0.67	0.62	B	B			
	SAN CARLOS BLVD	ALICO RD	4	E	25	9,900 (9)	12.00%	1.97	19,541	0	19,541	0.0925	1,808	0.5200	0.4800	940	868	1,900	1,970	1,970	1,970	0.48	0.44	B	B			
	ALICO RD	DANIELS PKWY	N/A	E	25	N/A	N/A	N/A	N/A	N/A	N/A	0.0925	N/A	0.5200	0.4800	N/A	N/A	1,900	1,970	1,970	1,970	N/A	N/A	N/A	N/A			
TREELINE AVENUE	TERMINAL ACCESS RD	DANIELS PKWY	4	E	61	25,500	4.36%	1.29	32,942	0	32,942	0.0930	3,064	0.5100	0.4900	1,563	1,501	1,970	2,040	2,040	2,040	0.77	0.74	B	B			
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====	=====				

Footnotes:

- (1) Existing plus committed number of lanes.
- (2) Lee County roadway LOS standard. I-75 based on FDOT FHHS LOS standard.
- (3) Based on Lee County 2008 Traffic Count Report. I-75 based on FDOT 2008 AADT traffic information
- (4) Based on historic traffic counts from 1999 to 2008. A minimum growth rate of 2% per year is assumed. Please refer to Appendix D, for detailed growth rate calculations and assumptions.
- (5) Growth factor for 6 years (from 2008 to 2014).
- (6) Peak season CPA traffic volumes based on FSUTMS travel model assignment.
- (7) Lee County Generalized Service Volumes (January, 2009). FDOT Generalized Service Volumes for I-75.
- (8) 2009 average weekday traffic based on the information from the News-Press article titled Estero Parkway flyover an instant hic dated December 11, 2009.
- (9) 2007 AADT since 2008 AADT is not available.

EXHIBIT 6
FLORIDA GULF COAST TECHNOLOGY AND RESEARCH PARK
COMPREHENSIVE PLAN AMENDMENT TRAFFIC STUDY, #09617
FUTURE 2014 TRAFFIC CONDITIONS WITH CPA
DIRECTIONAL PEAK HOUR (K100), PEAK SEASON

ROADWAY	FROM	TO	(1)		(2)	(3)		(4)	(5)	(6)		2014		(3)		(7)									
			# of	LOS	(3)	2008	Annual	2014	2014	CPA	2014	(3)	Two-Way	(3)		Directional		Directional Service Volumes		LOS		V/C		LOS	
			Lanes	Std	PCS #	AADT	Rate	Factor	AADT	PSWDT	AADT	Factor	Volume	Dir 1	Dir 2	Dir 1	Dir 2	LOS "C"	LOS "D"	LOS "E"	Std	Dir 1	Dir 2	Dir 1	Dir 2
*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	*****	
ALICO ROAD	DUSTY ROAD	LEE RD	6	E	15	18,100	4.36%	1.29	23.382	1.732	25,114	0.0958	2,406	0.5000	0.5000	1,203	1,203	2,870	2,960	2,960	2,960	0.41	0.41	B	B
	LEE RD	THREE OAKS PKWY	6	E	15	20,100	4.36%	1.29	25.966	2.328	28,294	0.0958	2,711	0.5000	0.5000	1,356	1,355	2,870	2,960	2,960	2,960	0.46	0.46	B	B
	THREE OAKS PKWY	I-75	6	E	15	28,300	4.36%	1.29	36.559	2.985	39,544	0.0958	3,788	0.5000	0.5000	1,894	1,894	2,870	2,960	2,960	2,960	0.64	0.64	B	B
	I-75	BEN HILL GRIFFIN PKWY	6	E	15	12,300	4.36%	1.29	15.889	6.463	22,352	0.0958	2,141	0.5000	0.5000	1,071	1,070	2,870	2,960	2,960	2,960	0.36	0.36	B	B
	BEN HILL GRIFFIN PKWY	FGCTRP ENTRANCE	2	E	15	5,800	2.00%	1.13	6.532	7.530	14,062	0.0958	1,347	0.5000	0.5000	674	673	720	880	920	920	0.73	0.73	D	D
	FGCTRP ENTRANCE	GREEN MEADOW RD	2	E	15	5,800	2.00%	1.13	6.532	206	6,738	0.0958	645	0.5000	0.5000	323	322	720	880	920	920	0.35	0.35	C	C
BEN HILL GRIFFIN PKWY	ESTERO PKWY	FGCU ENTRANCE	4	E	60	20,300	4.36%	1.29	26.224	740	26,964	0.0972	2,621	0.5200	0.4800	1,363	1,258	1,970	1,970	2,040	2,040	0.67	0.62	B	B
	FGCU ENTRANCE	COLLEGE CLUB DR	4	E	60	21,200	4.36%	1.29	27.387	992	28,379	0.0972	2,758	0.5200	0.4800	1,434	1,324	1,970	1,970	2,040	2,040	0.70	0.65	B	B
	COLLEGE CLUB DR	ALICO ROAD	6	E	60	21,200	4.36%	1.29	27.387	1,044	28,431	0.0972	2,763	0.5200	0.4800	1,437	1,326	2,970	3,070	3,070	3,070	0.47	0.43	B	B
	ALICO RD	FGCTRP ENTRANCE	4	E	60	24,000	4.36%	1.29	31.004	1,873	32,877	0.0972	3,196	0.5200	0.4800	1,662	1,534	1,970	2,040	2,040	2,040	0.81	0.75	C	B
	FGCTRP ENTRANCE	TERMINAL ACCESS RD	4	E	60	24,000	4.36%	1.29	31.004	1,873	32,877	0.0972	3,196	0.5200	0.4800	1,662	1,534	1,970	2,040	2,040	2,040	0.81	0.75	C	B
ESTERO PARKWAY	THREE OAKS PKWY	BEN HILL GRIFFIN PKWY	4	E	25	8,940 (8)	4.36%	1.29	11.549	365	11,914	0.0925	1,102	0.5200	0.4800	573	529	1,900	1,970	1,970	1,970	0.29	0.27	B	B
I-75	CORKSCREW RD	ALICO RD	6	D	FDOT	71,000	2.00%	1.13	79.958	1,766	81,724	0.0907	7,410	0.5579	0.4421	4,134	3,276	4,580	5,580	6,200	5,580	0.74	0.59	C	C
	ALICO RD	DANIELS PKWY	6	D	FDOT	66,500	2.00%	1.13	74.890	1,712	76,602	0.0907	6,950	0.5579	0.4421	3,877	3,073	4,580	5,580	6,200	5,580	0.69	0.55	C	B
THREE OAKS PARKWAY	ESTERO PKWY	SAN CARLOS BLVD	4	E	25	15,640 (8)	12.00%	1.97	30.871	256	31,127	0.0925	2,879	0.5200	0.4800	1,497	1,382	1,900	1,970	1,970	1,970	0.76	0.70	B	B
	SAN CARLOS BLVD	ALICO RD	4	E	25	9,900 (9)	12.00%	1.97	19.541	658	20,199	0.0925	1,868	0.5200	0.4800	971	897	1,900	1,970	1,970	1,970	0.49	0.46	B	B
	ALICO RD	DANIELS PKWY	N/A	E	25	N/A	N/A	N/A	N/A	N/A	N/A	0.0925	N/A	0.5200	0.4800	N/A	N/A	1,900	1,970	1,970	1,970	N/A	N/A	N/A	N/A
TREELINE AVENUE	TERMINAL ACCESS RD	DANIELS PKWY	4	E	61	25,500	4.36%	1.29	32.942	1,709	34,651	0.0930	3,223	0.5100	0.4900	1,644	1,579	1,970	2,040	2,040	2,040	0.81	0.77	C	B

Footnotes:

- (1) Existing plus committed number of lanes.
- (2) Lee County roadway LOS standard. I-75 based on FDOT FHHS LOS standard.
- (3) Based on Lee County 2008 Traffic Count Report. I-75 based on FDOT 2008 AADT traffic information
- (4) Based on historic traffic counts from 1999 to 2008. A minimum growth rate of 2% per year is assumed. Please refer to Appendix D, for detailed growth rate calculations and assumptions.
Alico Road. US 41 to I-75 - Based on total corridor volumes from 1999 to 2008. Lee County 2008 Traffic Count Report.
Ben Hill Griffin Parkway/Treeline Avenue - Negative growth rate for the past three years. To be conservative, assumed the Alico Road growth rate.
I-75, Corkscrew Road to Daniels Parkway - Based on total corridor volumes from 1999 to 2008. FDOT 2008 Traffic Information database. Less than 2% per year growth.
- (5) Growth factor for 6 years (from 2008 to 2014).
- (6) Peak season CPA traffic volumes based on FSUTMS travel model assignment.
- (7) Lee County Generalized Service Volumes (January, 2009). FDOT Generalized Service Volumes for I-75.
- (8) 2009 average weekday traffic based on the information from the News-Press article titled Estero Parkway flyover an instant hit dated December 11, 2009.
- (9) 2007 AADT since 2008 AADT is not available.

EXHIBIT 7
 FLORIDA GULF COAST TECHNOLOGY AND RESEARCH PARK
 COMPREHENSIVE PLAN AMEDMENT TRAFFIC STUDY, #09617
 ROADS IMPACT FEE ASSESSMENT - 2014

		(1) <u>Size</u>	<u>Fee Rate /Unit</u>	<u>Amount</u>
Residential:	Single-Family - Detached	0	\$8,976 /d.u.	\$0
	Multiple Family Building	0	\$6,297 /d.u.	\$0
	Duplex/Two-Family/Townhouse	0	\$6,297 /d.u.	\$0
	Hotel / Motel Room/Time-share	0	\$5,172 /room	\$0
	Mobile Home	0	\$4,686 /d.u.	\$0
	Elder /Disabled Housing	0	\$3,261 /site	\$0
	Adult Cong. Living Facility (ACLF)	0	\$2,025 /d.u.	\$0
	Recreational Vehicle Site	0	\$4,686 /site	\$0
Office:	General Office	0	\$7,305 /1,000 s.f.	\$0
	Medical Office	0	\$24,126 /1,000 s.f.	\$0
	Hospital	0	\$11,736 /1,000 s.f.	\$0
	Nursing Home	0	\$4,071 /1,000 s.f.	\$0
	Church	0	\$4,575 /1,000 s.f.	\$0
	Day Care Center	0	\$12,840 /1,000 s.f.	\$0
	Elementary / Sec. School (Private)	0	\$2,223 /1,000 s.f.	\$0
Industrial:	Industrial Park	0	\$6,195 /1,000 s.f.	\$0
	Warehouse	0	\$4,416 /1,000 s.f.	\$0
	Mini-Warehouse	0	\$1,587 /1,000 s.f.	\$0
	Mine	0	\$1,587 /Cubic Yard	\$0.00
Retail: (GFA)	Shopping Center	350,000	\$10,983 /1,000 s.f.	\$3,844,050
	Bank	0	\$25,134 /1,000 s.f.	\$0
	Car Wash, Self Service	0	\$5,262 /Stall	\$0
	Convenience Store w/Gas Sales	0	\$40,305 /1,000 s.f.	\$0
	Golf Course (open to public)	0	\$2,697 /acre	\$0
	Movie Theater	0	\$23,220 /1,000 s.f.	\$0
	Restaurant, Fast Food	0	\$44,337 /1,000 s.f.	\$0
	Restaurant, Standard	0	\$20,337 /1,000 s.f.	\$0

\$3,844,050

Footnotes:

(1) Based on the adopted Lee County Ordinance 08-24, Roads Impact Fee Schedule.

APPENDIX A

LEE COUNTY APPLICATION FOR A COMPREHENSIVE PLAN AMENDMENT





Lee County Board of County Commissioners
Department of Community Development
Division of Planning
Post Office Box 398
Fort Myers, FL 33902-0398
Telephone: (239) 533-8585
FAX: (239) 485-8319

APPLICATION FOR A COMPREHENSIVE PLAN AMENDMENT

(To be completed at time of intake)

DATE REC'D _____ REC'D BY: _____

APPLICATION FEE _____ TIDEMARK NO: _____

THE FOLLOWING VERIFIED:

Zoning ☐ Commissioner District ☐

Designation on FLUM ☐

(To be completed by Planning Staff)

Plan Amendment Cycle: ☐ Normal ☐ Small Scale ☐ DRI ☐ Emergency

Request No: _____

APPLICANT PLEASE NOTE:

Answer all questions completely and accurately. Please print or type responses. If additional space is needed, number and attach additional sheets. The total number of sheets in your application is: _____

Submit **6** copies of the complete application and amendment support documentation, including maps, to the Lee County Division of Planning. Up to 90 additional copies will be required for Local Planning Agency, Board of County Commissioners hearings and the Department of Community Affairs' packages. Staff will notify the applicant prior to each hearing or mail out.

I, the undersigned owner or authorized representative, hereby submit this application and the attached amendment support documentation. The information and documents provided are complete and accurate to the best of my knowledge.

DATE SIGNATURE OF OWNER OR AUTHORIZED REPRESENTATIVE

I. APPLICANT/AGENT/OWNER INFORMATION

APPLICANT		
ADDRESS		
CITY	STATE	ZIP
TELEPHONE NUMBER		FAX NUMBER
AGENT*		
ADDRESS		
CITY	STATE	ZIP
TELEPHONE NUMBER		FAX NUMBER
OWNER(s) OF RECORD		
ADDRESS		
CITY	STATE	ZIP
TELEPHONE NUMBER		FAX NUMBER

Name, address and qualification of additional planners, architects, engineers, environmental consultants, and other professionals providing information contained in this application.

* This will be the person contacted for all business relative to the application.

II. REQUESTED CHANGE (Please see Item 1 for Fee Schedule)

A. TYPE: (Check appropriate type)

☐ Text Amendment

☐ Future Land Use Map Series Amendment
(Maps 1 thru 22)

List Number(s) of Map(s) to be amended

1. Future Land Use Map amendments require the submittal of a complete list, map, and two sets of mailing labels of all property owners and their mailing addresses, for all property within 500 feet of the perimeter of the subject parcel. The list and mailing labels may be obtained from the Property Appraisers office. The map must reference by number or other symbol the names of the surrounding property owners list. The applicant is responsible for the accuracy of the list and map.

At least 15 days before the Local Planning Agency (LPA) hearing, the applicant will be responsible for posting signs on the subject property, supplied by the Division of Planning, indicating the action requested, the date of the LPA hearing, and the case number. An affidavit of compliance with the posting requirements must be submitted to the Division of Planning prior to the LPA hearing. The signs must be maintained until after the final Board adoption hearing when a final decision is rendered.

B. SUMMARY OF REQUEST (Brief explanation):

III. PROPERTY SIZE AND LOCATION OF AFFECTED PROPERTY (for amendments affecting development potential of property)

A. Property Location:

1. Site Address: _____

2. STRAP(s): _____

B. Property Information

Total Acreage of Property: _____

Total Acreage included in Request: _____

Total Uplands: _____

Total Wetlands: _____

Current Zoning: _____

Current Future Land Use Designation: _____

Area of each Existing Future Land Use Category: _____

Existing Land Use: _____

C. State if the subject property is located in one of the following areas and if so how does the proposed change effect the area:

Lehigh Acres Commercial Overlay: _____

Airport Noise Zone 2 or 3: _____

Acquisition Area: _____

Joint Planning Agreement Area (adjoining other jurisdictional lands): _____

Community Redevelopment Area: _____

D. Proposed change for the subject property:

E. Potential development of the subject property:

1. Calculation of maximum allowable development under existing FLUM:

Residential Units/Density _____

Commercial intensity _____

Industrial intensity _____

2. Calculation of maximum allowable development under proposed FLUM:

Residential Units/Density _____

Commercial intensity _____

Industrial intensity _____

IV. AMENDMENT SUPPORT DOCUMENTATION

At a minimum, the application shall include the following support data and analysis. These items are based on comprehensive plan amendment submittal requirements of the State of Florida, Department of Community Affairs, and policies contained in the Lee County Comprehensive Plan. Support documentation provided by the applicant will be used by staff as a basis for evaluating this request. To assist in the preparation of amendment packets, the applicant is encouraged to provide all data and analysis electronically. (Please contact the Division of Planning for currently accepted formats)

A. General Information and Maps

NOTE: For each map submitted, the applicant will be required to provide a reduced map (8.5" x 11") for inclusion in public hearing packets.

The following pertains to all proposed amendments that will affect the development potential of properties (unless otherwise specified).

1. Provide any proposed text changes.
2. Provide a current Future Land Use Map at an appropriate scale showing the boundaries of the subject property, surrounding street network, surrounding designated future land uses, and natural resources.
3. Provide a proposed Future Land Use Map at an appropriate scale showing the boundaries of the subject property, surrounding street network, surrounding designated future land uses, and natural resources.
4. Map and describe existing land *uses* (not designations) of the subject property and surrounding properties. Description should discuss consistency of current uses with the proposed changes.
5. Map and describe existing zoning of the subject property and surrounding properties.
6. The certified legal description(s) and certified sketch of the description for the property subject to the requested change. A metes and bounds legal description must be submitted specifically describing the entire perimeter boundary of the property with accurate bearings and distances for every line. The sketch must be tied to the state plane coordinate system for the Florida West Zone (North America Datum of 1983/1990 Adjustment) with two coordinates, one coordinate being the point of beginning and the other an opposing corner. If the subject property contains wetlands or the proposed amendment includes more than one land use category a metes and bounds legal description, as described above, must be submitted in addition to the perimeter boundary of the property for each wetland or future land use category.

7. A copy of the deed(s) for the property subject to the requested change.
8. An aerial map showing the subject property and surrounding properties.
9. If applicant is not the owner, a letter from the owner of the property authorizing the applicant to represent the owner.

B. Public Facilities Impacts

NOTE: The applicant must calculate public facilities impacts based on a maximum development scenario (see Part II.H.).

1. Traffic Circulation Analysis

The analysis is intended to determine the effect of the land use change on the Financially Feasible Transportation Plan/Map 3A (20-year horizon) and on the Capital Improvements Element (5-year horizon). Toward that end, an applicant must submit the following information:

Long Range – 20-year Horizon:

- a. Working with Planning Division staff, identify the traffic analysis zone (TAZ) or zones that the subject property is in and the socio-economic data forecasts for that zone or zones;
- b. Determine whether the requested change requires a modification to the socio-economic data forecasts for the host zone or zones. The land uses for the proposed change should be expressed in the same format as the socio-economic forecasts (number of units by type/number of employees by type/etc.);
- c. If no modification of the forecasts is required, then no further analysis for the long range horizon is necessary. If modification is required, make the change and provide to Planning Division staff, for forwarding to DOT staff. DOT staff will rerun the FSUTMS model on the current adopted Financially Feasible Plan network and determine whether network modifications are necessary, based on a review of projected roadway conditions within a 3-mile radius of the site;
- d. If no modifications to the network are required, then no further analysis for the long range horizon is necessary. If modifications are necessary, DOT staff will determine the scope and cost of those modifications and the effect on the financial feasibility of the plan;
- e. An inability to accommodate the necessary modifications within the financially feasible limits of the plan will be a basis for denial of the requested land use change;
- f. If the proposal is based on a specific development plan, then the site plan should indicate how facilities from the current adopted Financially Feasible Plan and/or the Official Trafficways Map will be accommodated.

Short Range – 5-year CIP horizon:

- a. Besides the 20-year analysis, for those plan amendment proposals that include a specific and immediated development plan, identify the existing

- roadways serving the site and within a 3-mile radius (indicate laneage, functional classification, current LOS, and LOS standard);
 - b. Identify the major road improvements within the 3-mile study area funded through the construction phase in adopted CIP's (County or Cities) and the State's adopted Five-Year Work Program;
Projected 2030 LOS under proposed designation (calculate anticipated number of trips and distribution on roadway network, and identify resulting changes to the projected LOS);
 - c. For the five-year horizon, identify the projected roadway conditions (volumes and levels of service) on the roads within the 3-mile study area with the programmed improvements in place, with and without the proposed development project. A methodology meeting with DOT staff prior to submittal is required to reach agreement on the projection methodology;
 - d. Identify the additional improvements needed on the network beyond those programmed in the five-year horizon due to the development proposal.
2. Provide an existing and future conditions analysis for (see Policy 95.1.3):
- a. Sanitary Sewer
 - b. Potable Water
 - c. Surface Water/Drainage Basins
 - d. Parks, Recreation, and Open Space
 - e. Public Schools.

Analysis should include (but is not limited to) the following (see the Lee County Concurrency Management Report):

- Franchise Area, Basin, or District in which the property is located;
- Current LOS, and LOS standard of facilities serving the site;
- Projected 2030 LOS under existing designation;
- Projected 2030 LOS under proposed designation;
- Existing infrastructure, if any, in the immediate area with the potential to serve the subject property.
- Improvements/expansions currently programmed in 5 year CIP, 6-10 year CIP, and long range improvements; and
- Anticipated revisions to the Community Facilities and Services Element and/or Capital Improvements Element (state if these revisions are included in this amendment).
- Provide a letter of service availability from the appropriate utility for sanitary sewer and potable water.

In addition to the above analysis for Potable Water:

- Determine the availability of water supply within the franchise area using the current water use allocation (Consumptive Use Permit) based on the annual average daily withdrawal rate.
- Include the current demand and the projected demand under the existing designation, and the projected demand under the proposed designation.

- Include the availability of treatment facilities and transmission lines for reclaimed water for irrigation.
 - Include any other water conservation measures that will be applied to the site (see Goal 54).
3. Provide a letter from the appropriate agency determining the adequacy/provision of existing/proposed support facilities, including:
 - a. Fire protection with adequate response times;
 - b. Emergency medical service (EMS) provisions;
 - c. Law enforcement;
 - d. Solid Waste;
 - e. Mass Transit; and
 - f. Schools.

In reference to above, the applicant should supply the responding agency with the information from Section's II and III for their evaluation. This application should include the applicant's correspondence to the responding agency.

C. Environmental Impacts

Provide an overall analysis of the character of the subject property and surrounding properties, and assess the site's suitability for the proposed use upon the following:

1. A map of the Plant Communities as defined by the Florida Land Use Cover and Classification system (FLUCCS).
2. A map and description of the soils found on the property (identify the source of the information).
3. A topographic map depicting the property boundaries and 100-year flood prone areas indicated (as identified by FEMA).
4. A map delineating the property boundaries on the Flood Insurance Rate Map effective August 2008.
5. A map delineating wetlands, aquifer recharge areas, and rare & unique uplands.
6. A table of plant communities by FLUCCS with the potential to contain species (plant and animal) listed by federal, state or local agencies as endangered, threatened or species of special concern. The table must include the listed species by FLUCCS and the species status (same as FLUCCS map).

D. Impacts on Historic Resources

List all historic resources (including structure, districts, and/or archeologically sensitive areas) and provide an analysis of the proposed change's impact on these resources. The following should be included with the analysis:

1. A map of any historic districts and/or sites, listed on the Florida Master Site File, which are located on the subject property or adjacent properties.
 2. A map showing the subject property location on the archeological sensitivity map for Lee County.
- E. Internal Consistency with the Lee Plan
1. Discuss how the proposal affects established Lee County population projections, Table 1(b) (Planning Community Year 2030 Allocations), and the total population capacity of the Lee Plan Future Land Use Map.
 2. List all goals and objectives of the Lee Plan that are affected by the proposed amendment. This analysis should include an evaluation of all relevant policies under each goal and objective.
 3. Describe how the proposal affects adjacent local governments and their comprehensive plans.
 4. List State Policy Plan and Regional Policy Plan goals and policies which are relevant to this plan amendment.
- F. Additional Requirements for Specific Future Land Use Amendments
1. Requests involving Industrial and/or categories targeted by the Lee Plan as employment centers (to or from)
 - a. State whether the site is accessible to arterial roadways, rail lines, and cargo airport terminals,
 - b. Provide data and analysis required by Policy 2.4.4,
 - c. The affect of the proposed change on county's industrial employment goal specifically policy 7.1.4.
 2. Requests moving lands from a Non-Urban Area to a Future Urban Area
 - a. Demonstrate why the proposed change does not constitute Urban Sprawl. Indicators of sprawl may include, but are not limited to: low-intensity, low-density, or single-use development; 'leap-frog' type development; radial, strip, isolated or ribbon pattern type development; a failure to protect or conserve natural resources or agricultural land; limited accessibility; the loss of large amounts of functional open space; and the installation of costly and duplicative infrastructure when opportunities for infill and redevelopment exist.
 3. Requests involving lands in critical areas for future water supply must be evaluated based on policy 2.4.2.
 4. Requests moving lands from Density Reduction/Groundwater Resource must fully address Policy 2.4.3 of the Lee Plan Future Land Use Element.

G. Justify the proposed amendment based upon sound planning principles. Be sure to support all conclusions made in this justification with adequate data and analysis.

Item 1: Fee Schedule

Map Amendment Flat Fee	\$2,000.00 each
Map Amendment > 20 Acres	\$2,000.00 and \$20.00 per 10 acres
Small Scale Amendment (10 acres or less)	\$1,500.00 each
Text Amendment Flat Fee	\$2,500.00 each

AFFIDAVIT

I, _____, certify that I am the owner or authorized representative of the property described herein, and that all answers to the questions in this application and any sketches, data, or other supplementary matter attached to and made a part of this application, are honest and true to the best of my knowledge and belief. I also authorize the staff of Lee County Community Development to enter upon the property during normal working hours for the purpose of investigating and evaluating the request made through this application.

Signature of owner or owner-authorized agent

Date

Typed or printed name

STATE OF FLORIDA)
COUNTY OF LEE)

The foregoing instrument was certified and subscribed before me this _____ day of _____ 19____,
by _____, who is personally known to me or who has produced
_____ as identification.

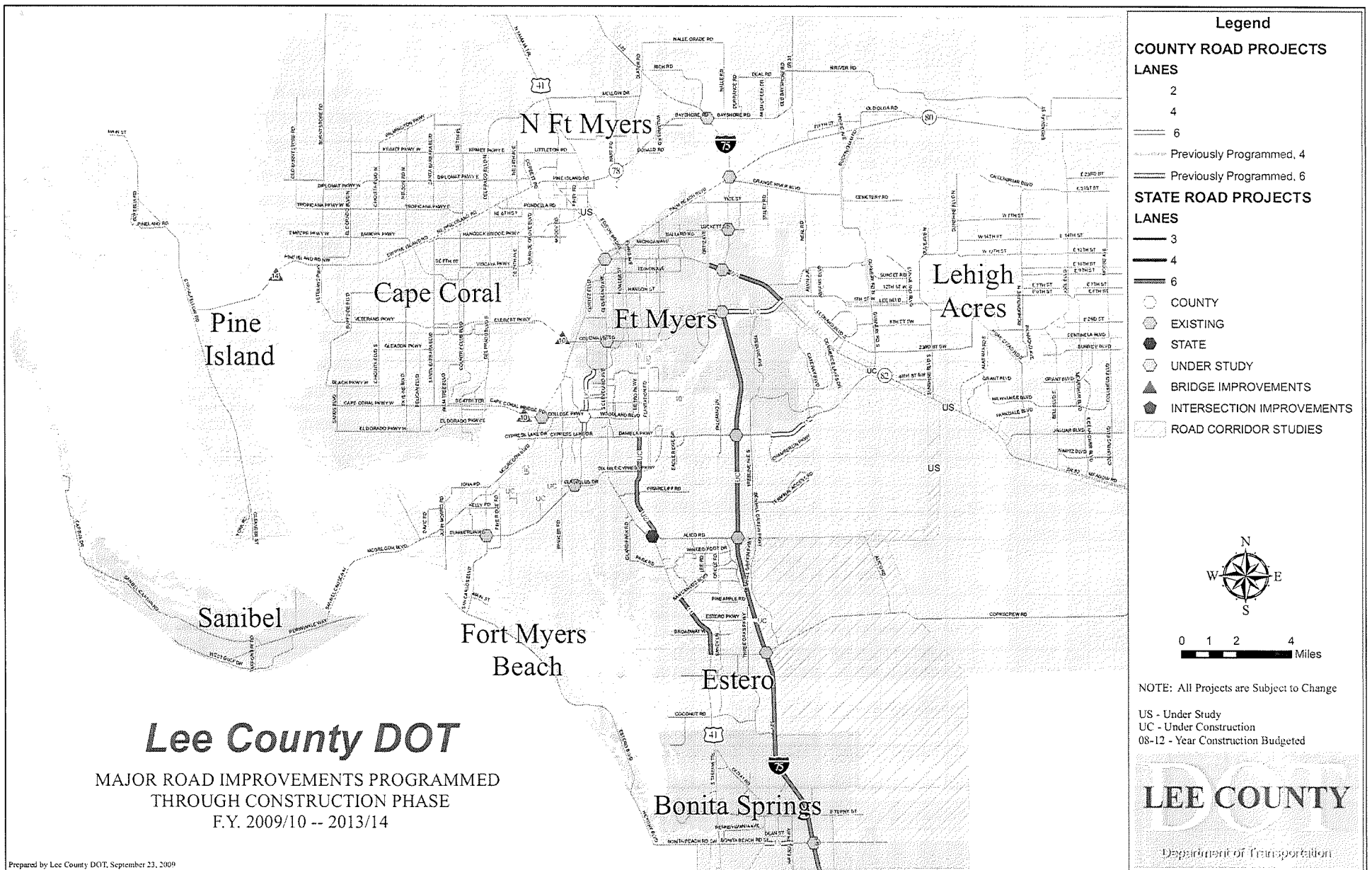
(SEAL)

Signature of notary public

Printed name of notary public

APPENDIX B

LEE COUNTY DOT
FIVE YEAR WORK PROGRAM FY 2009/10 – 2013/14



SUMMARY OF MAJOR ROAD PROJECTS PROGRAMMED BY LEE COUNTY - FY 09/10 TO FY 13/14 (as adopted 9/17/09)

COMM DIST.	PROJ. NUMBER	PROJECT NAME	LENGTH (MILES)	FY 98-08 PRIOR EXP.	FY08/09 BUDGET	09/10	10/11	11/12	12/13	13/14	5-YEAR TOTAL	6-10	PROJECT TOTAL	FUTURE REVENUE SOURCE	PROJECT MANAGER
5	204030	Alico Road Multi-Laning Additional work beyond 6L on maintenance access to Fiddlesticks Canal		16,102,750 ALL	1,800,803 ALL	0	400,000 CST	0	0	0	400,000	0	18,303,553	GT	Don DeBerry, 533-8503 ddeberry@leegov.com
5	205034	Alico-Green Meadows Corridor Study (UNDERWAY) Feasibility/alignment study for arterial extension from end of Alico Rd up Green Meadows Dr. to SR 82 opposite Sunshine Blvd.	7.00	476,189 PRELIM	0	0	0	0	0	1,500,000 ROW	1,500,000	52,950,000 ALL	54,926,189	GT	Sarah Clarke, 533-8718 sclarke@leegov.com
All	206002	Bicycle/Pedestrian Facilities Annual project for facilities on existing County-maintained roads		12,640,508 DES/CST	2,778,129 DES/CST	240,000 CST	623,000 DES/CST	27,000 CST	490,000 DES/CST	1,550,000 CST	2,930,000	3,700,000 CST	22,048,637	IF/GT	Vickie Griffin, 533-8580 griffiv@leegov.com
1	206047	Boca Grande Master Drainage Project (CST COMPLETE) Development of master plan and implementation in 9 phases GFRTF Loan Repayment - Principal (\$1,000,000) GFRTF Loan Repayment - Interest (2%)		1,696,843 DES/CST 250,000 41,220	49,034 CST 250,000 37,500	0	0	0	0	0	0	0	1,745,877	GT/IF21	Eyra Cash, 533-8562 ecash@leegov.com
3	205720	Bonita Beach Road Phase II 6L, Old 41 to Lime St. (Jointly funded per interlocal agreement) GFRTF Loan Repayment - Principal (\$3,250,000) GFRTF Loan Repayment - Interest (2%)	0.90	2,027,548 DES/ROW	2,052,451 ROW/PM	0	0	0	6,500,000 CST	366,000 LS	6,866,000	0	10,945,999	IF24/CITY/AV IF24	Eyra Cash, 533-8562 ecash@leegov.com
3	205723	Bonita Beach Road Phase III 6L widening, W. of US 41 to Old 41	2.00	462,543 DES/PM	1,757,457 DES/PM	0	0	0	0	0	0	26,000,000 ROW/CST	28,220,000	IF24/CITY/AV	Eyra Cash, 533-8562 ecash@leegov.com
1,4	204088	Burnt Store Road 4L SR 78 (Pine Island Road) to Van Buren Parkway	3.60	5,323,744 DES/ROW	1,516,861 DES/ROW	2,500,000 ROW	2,500,000 ROW	0	0	0	5,000,000	24,400,000 CST/LS	36,240,605	SURP. TOLLS	Mike Rigsby, 533-8513 mrigsby@leegov.com
2	205601	Cape/Midpoint Plaza Reconstruction Reconstruction of toll plazas to modernize and reflect 1-way tolling		3,049,178 DES/CST	8,807,100 DES/CST	0	0	0	0	0	0	0	11,856,278	SURP. TOLLS	Paul Wingard, 533-8545 wingarpw@leegov.com
2	206064	Colonial @ Metro Queue Jump Tolled grade separation		1,041,876 DES/PM	955,211 DES/PM	0	0	0	0	0	0	40,200,000 ROW/CST	42,197,087	NEW TOLLS	Sarah Clarke, 533-8718 sclarke@leegov.com
5	204054	Colonial Boulevard/Six Mile to SR 82 (CST UNDERWAY) 6L widening, plus interstate access improvements (includes \$1,000,000 from City of Fort Myers and \$4.7 million in State TRIP funds)	2.65	9,052,800 DES/ROW	20,898,770 CST	0	0	829,000 LS	0	0	829,000	0	30,780,570	IF23/CITY/AV TRIP/AV	Mike Rigsby, 533-8513 mrigsby@leegov.com
2	205054	Colonial Expressway 4 elevated express lanes, McGregor Blvd. to Metro Pkwy.		1,854,744 PD&E/PM	2,811,188 PD&E/PM	0	0	0	0	0	0	595,884,068 ALL	600,550,000	SURP/NEW TOLLS	Sarah Clarke, 533-8718 sclarke@leegov.com
2	205035	Communications Plant Updates Installation of fiber optics from Billys Creek to downtown and RTMC		175,155 DES/CST	209,844 CST	0	0	0	0	0	0	900,000 CST	1,284,999	GT	Earl Salley, 533-9500 salleyer@leegov.com
3,5	204078	CR 951 Extension PD&E (UNDERWAY) Study for new 4L, Immokalee Rd. (Collier Co.) to Alico Rd. GFRTF Loan Repayment - Principal (\$2,800,000) GFRTF Loan Repayment - Interest (2%)	15.00	5,939,181 PD&E/PM/ROW 2,800,000 1,165,553	662,674 ROW 2,800,000 1,165,553	0	0	0	0	0	0	0	6,601,855	IF25	Don DeBerry, 533-8503 ddeberry@leegov.com
3,5	204097	CR 951 Extension New 4L expressway, Bonita Beach Rd. to Alico Rd. GFRTF Loan Repayment - Principal (\$22,500,000) GFRTF Loan Repayment - Interest (2%)	11.50	22,500,000 ROW	0	1,000,000 ROW	0	0	0	0	1,000,000	0	23,500,000	GT	Don DeBerry, 533-8503 ddeberry@leegov.com
All	206066	Countywide Signal Retiming Complete signal system retiming and timing updates		209,590 CST	645,910 CST	0	100,000 CST	200,000 CST	0	0	300,000	0	1,155,500	FDOT	Earl Salley, 533-9500 salleyer@leegov.com
5		Daniels 6L/Chamberlin-Gateway 6L widening, Chamberlin Pkwy. to Gateway Blvd. GFRTF Loan Repayment - Principal (\$4,500,000) GFRTF Loan Repayment - Interest (2%)	1.70	0	0	500,000 DES	4,500,000 CST	0	0	0	5,000,000	0	5,000,000	GT/LOAN	Don DeBerry, 533-8503 ddeberry@leegov.com
4	205062	Del Prado ROW Reimbursement of land acquisition by Cape Coral south of SR 78		196 ROW	0	3,999,804 ROW	0	0	0	0	3,999,804	0	4,000,000	IF5/IF22	Don DeBerry, 533-8503 ddeberry@leegov.com
2		e-ARCS Replacement Funds for complete replacement due to technology changes		0	0	0	0	0	0	8,700,000 DES	8,700,000	0	8,700,000	SURP. TOLLS	Paul Wingard, 533-8545 wingarpw@leegov.com

SUMMARY OF MAJOR ROAD PROJECTS PROGRAMMED BY LEE COUNTY - FY 09/10 TO FY 13/14 (as adopted 9/17/09)

3	205067	Estero Blvd. Improvements Phased improvements to County roadway in Town (PRELIMINARY EVALUATION COMPLETED, ROW SURVEY UNDERWAY, GRANT FUNDS IN 10 AND 11 FOR INTERIM IMPROVEMENTS TO BE DETERMINED WITH TOWN, SIDEWALK IMPROVEMENTS FUNDED SEPARATELY THROUGH BIKE-PED PROGRAM)	6.00	563,920 DES/PM	1,036,080 DES/PM	300,000 DES	1,400,000 CST	0	0	0	1,700,000	0	3,300,000	GT/TOWN GRANT	Rob Phelan, 533-8594 phelanrk@leegov.com
5	205021	Estero Parkway Extension (CST UNDERWAY) New 4L, Three Oaks Pkwy. to Ben Hill Griffin Pkwy., including prelim. phases for 2L ext. from Ben Hill Griffin Pkwy. to Corkscrew Rd. GFRTF Loan Repayment - Principal (\$18,100,000) GFRTF Loan Repayment - Interest (2%)	0.70	29,896,549 ALL	26,206,510 CST	0	0	350,000 LS	0	0	350,000	0	56,453,059	IF24/IF25	Nicole Maxey, 985-1200
					3,600,000 1,823,389	2,173,607 261,000	2,382,072 217,528	2,432,072 169,886	2,498,292 121,245	2,584,776 71,279	12,070,819 840,938		15,670,819 2,664,327	IF24	
3	204083	Gladiolus Widening (CST UNDERWAY) 4L Pine Ridge Rd. to Bass Rd., 6L Bass Rd. to Winkler Rd., plus 4L Bass Rd. from Healthpark to Gladiolus and A&W Bulb Rd. overlay/sidewalk	2.30	5,883,481 ALL	17,304,586 CST	0	0	150,000 LS	1,000,000 LS	0	1,150,000	0	24,338,067	IF4/IF24/ GT/AV	Mike Rigsby, 533-8513 mrigsby@leegov.com
4	205721	Hancock Bridge Pkwy. Ext. (CORRIDOR STUDY UNDERWAY) 4L Extension, from US 41 to Bus. 41.		1,033 PRELIM	318,966 PRELIM	0	0	0	0	0	0	64,580,000 ALL	64,899,999	IF22	Sarah Clarke, 533-8718 sclarke@leegov.com
5	205063	Homestead 4L/Sunrise-Alabama (DES UNDERWAY) 4L widening, south of Sunrise Blvd. to Alabama Rd. GFRTF Loan Repayment - Principal (\$3,400,000) GFRTF Loan Repayment - Interest (2%)	2.25	1,760,185 DES/PM	539,813 DES/PM	1,000,000 ROW	3,400,000 ROW	0	0	0	4,400,000	15,810,000 ROW/CST	22,509,998	IF23/LOAN	Sarah Clarke, 533-8718 sclarke@leegov.com
				0	0	0	0	0	0	0	0	0	0	IF23	
2,3,5	205036	I-75 Complimentary ITS Deployment ITS installation on County roads adjacent to interstate		39,900 CST	1,160,100 DES/CST	0	0	0	0	0	0	0	1,200,000	GT/CIGP	Eari Salley, 533-9500 salleyer@leegov.com
2	205068	Luckett Rd 4L/Ortiz to I-75 (DES UNDERWAY WITH ORTIZ) 4L widening	0.46	538,832 ROW	611,168 ROW/PM	0	0	0	0	0	0	5,854,000 ROW/CST	7,004,000	IF23/AV	Eyra Cash, 533-8562 ecash@leegov.com
1	205904	Matlacha Pass Bridge Replacement (COUNTY EXPLORING BUILD/FINANCE OPTION AS MEANS TO ADVANCE CST)		2,884,657 DES/ROW	558,646 DES/PM	200,000 MIT	0	0	0	26,500,000 CST	26,700,000	0	30,143,303	GT/IF22	Don DeBerry, 533-8503 ddeberry@leegov.com
5	205069	Meadow Road Upgrade Reconstruct as reverse frontage road, Wallace Rd. to Naples Ave.	10.17	0	0	0	0	0	0	0	0	7,750,000 ALL	7,750,000	IF23	Don DeBerry, 533-8503 ddeberry@leegov.com
2		North Airport Rd. Ext. 2L Extension, end of existing road to Metro Parkway GFRTF Loan Repayment - Principal (\$3,315,000) GFRTF Loan Repayment - Interest (2%)	0.62	0	0	3,315,000 ALL	0	0	0	0	3,315,000	0	3,315,000	LOAN	Sarah Clarke, 533-8718 sclarke@leegov.com
				0	0	0	500,000	500,000	500,000	500,000	2,000,000		2,000,000	IF23	
				0	0	0	66,300	56,300	46,300	36,300	205,200		205,200		
2		Ortiz 4L/Colonial-MLK 4L widening, Colonial Blvd. to SR 82 (Dr. Martin Luther King, Jr. Blvd.)	1.73	0	0	0	0	0	0	0	0	11,041,000 ALL	11,041,000	IF23/AV	Eyra Cash, 533-8562 ecash@leegov.com
2	205056	Ortiz 4L/Luckett-SR 80 4L widening, Luckett Rd. to SR 80 (Palm Beach Blvd.) GFRTF Loan Repayment - Principal (\$1,300,000) GFRTF Loan Repayment - Interest (2%)	1.33	5,311,598 DES/ROW	5,827,284 DES/ROW	0	1,300,000 ROW	0	0	0	1,300,000	10,959,000 CST	23,397,882	IF23/LOAN	Eyra Cash, 533-8562 ecash@leegov.com
				0	0	0	0	0	0	0	0	0	0	IF23	
				0	0	0	0	26,000	26,000	26,000	78,000		78,000		
2	204072	Ortiz 4L/MLK-Luckett 4L widening, SR 82 (Dr. Martin Luther King, Jr. Blvd.) to Luckett Rd. GFRTF Loan Repayment - Principal (\$1,300,000) GFRTF Loan Repayment - Interest (2%)	1.25	6,779,413 DES/ROW	2,338,233 DES/ROW	0	1,300,000 ROW	0	0	0	1,300,000	9,953,000 CST	20,370,646	IF23/AV	Eyra Cash, 533-8562 ecash@leegov.com
				0	0	0	0	0	0	0	0	0	0	IF23	
				0	0	0	0	26,000	26,000	26,000	78,000		78,000		
1	206751	Pine Island ITS Fiber optic/ITS equipment installation along Pine Island Road		15,325 DES	5,675 DES	0	0	0	0	0	0	389,000 CST	410,000	PS/GT	Eari Salley, 533-9500 salleyer@leegov.com
2	204065	Plantation Ext./Idewild to Colonial (CST UNDERWAY) New 4L	1.00	4,832,641 DES/ROW	4,045,698 ALL	0	0	0	0	0	0	0	8,878,339	IF23/AV	Mike Rigsby, 533-8513 mrigsby@leegov.com
1,4	206068	SeGo Implementation New transponders and related readers, software upgrades		198,909 CST	1,052,638 CST	0	0	0	0	0	0	0	1,251,547	SURPLUS TOLLS	Paul Wingard, 533-8545 wingarpw@leegov.com

SUMMARY OF MAJOR ROAD PROJECTS PROGRAMMED BY LEE COUNTY - FY 09/10 TO FY 13/14 (as adopted 9/17/09)																
2	204604	Six Mile Cypress Pkwy 4L N. of Daniels Pkwy. to S. of Winkler Ext.	2.30	1,032,835 DES/PM	533,273 DES/PM	7,500,000 CST/CEI	0	0	0	0	0	7,500,000	1,500,000 LS	10,566,108	ARRA/IF23 TRIP/AV	Mike Rigsby, 533-8513 mrigsby@leegov.com
2,3,5	206007	Summerlin/Boyscout-Cypress Lake (CST UNDERWAY) 6L widening, including overpass at College Parkway	2.60	11,776,675 ALL	27,005,961 ALL	0	0	0	0	0	0	0	0	38,782,636	IF23/AV	Sarah Clarke, 533-8718 sclarke@leegov.com
5	204053	Three Oaks Parkway Extension North New 4L, N. of Alico Rd. to Daniels Pkwy.	3.50	5,403,791 DES/ROW	6,940,630 DES/ROW	0	0	0	0	0	0	0	35,036,883 ROW/CST	47,381,304	IF24	Eyra Cash, 533-8562 ecash@leegov.com
5	204081	Three Oaks Parkway Widening (CST UNDERWAY) 4L widening, Corkscrew Rd. to Alico Rd. GFRTF Loan Repayment - Principal (\$5,500,000) GFRTF Loan Repayment - Interest (5%)	4.60	25,061,411 ALL 1,375,000 275,000	3,534,422 ALL 1,375,000 206,250	0 1,375,000 55,000	0 1,375,000 27,500	0 0 0	0 0 0	0 0 0	2,750,000 82,500	0 5,500,000 563,750	28,595,833	IF24/GT/ AV GT	Nicole Maxey, 985-1200	
1,4	205039	VES Implementation of Vehicle Enforcement System at toll bridges		1,587,196 CST	1,175,656 CST	0	0	0	0	0	0	0	0	2,762,852	SURPLUS TOLLS	Paul Wingard, 533-8545 wingarpw@leegov.com
1,4		Veterans/Santa Barbara Overpass Grade separation at intersection		0	0	2,250,000 DES	0	0	0	0	0	2,250,000	30,000,000 CST	32,250,000	SURPLUS TOLLS	Sarah Clarke, 479-8718 sclarke@leegov.com
TOTAL			85.16										\$86,489,804	\$936,906,951	\$1,354,658,722	

NOTE: Budget figures represent estimates for programming purposes. All dollar figures are subject to adjustment. Program year represents when funds are available, not necessarily when phase started or completed.
Totals exclude deleted (shaded) projects.

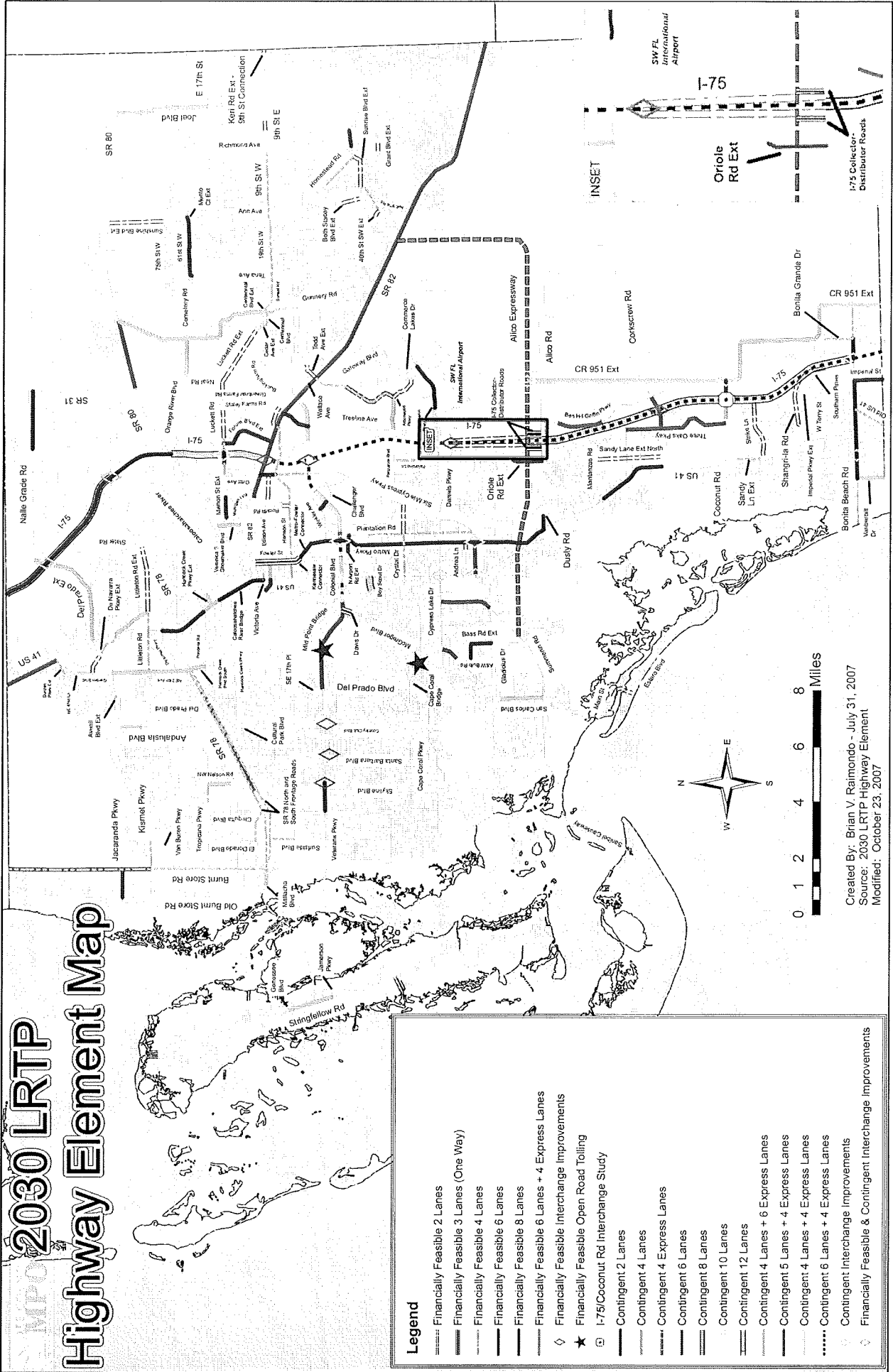
KEY (PHASES): PRELIM = Preliminary Study; PD&E = Project Development & Environmental Study; DES = Design; ROW = Right-of-Way Acquisition; CST = Construction; CEI = Construction Engineering Inspection; PM = Project Management; LS = Landscaping;
MIT = Mitigation

KEY (FUNDS): IF23 = Road Impact Fees from District 23; GT = Local Option Gas Taxes; CITY = City funds; PS = Public Safety funds; FDOT = Florida Dept. of Transportation; AV = Ad Valorem

APPENDIX C
LEE COUNTY MPO
2030 LRTP HIGHWAY ELEMENT MAP



2030 LRTP Highway Element Map



APPENDIX D
GROWTH RATE CALCULATIONS

		Historic Traffic Counts					Growth Rate
		1999	2005	2006	2007	2008	1999 - 2008
<u>Treeline Ave Growth Rate (N of Alico Road)</u>							
Treeline Ave.	N Daniels Pkwy.			7200	5100	5600	
	S of Daniels Pkwy.	2200	10400	28700	27600	23500	
	N of Midfield Terminal		16200	27100	27700	25500	
BHG	S of Midfield Terminal		19000	20900	23700	24000	
Total		2200	45600	83900	84100	78600	n/a
<u>BHG Pkwy Growth Rate (S of Alico Road)</u>							
BHG	S of Alico Road	2800		20300	26800	21200	
	N of Corkscrew Road	2800	17200	20500	26200	20300	
Total		5600	17200	40800	53000	41500	
<u>Alico Road Growth Rate (US 41 to I-75)</u>							
Alico Road	E of US 41	15100		18900	21200	18100	2.03%
	E of Lee Road	13900		22600	22900	20100	4.18%
	W of I-75	16300				28300	6.32%
Total		45300	0	41500	44100	66500	4.36%
<u>Three Oaks Parkway Growth Rate (Corkscrew Road to Alico Road)</u>							
Three Oaks P	N of Corkscrew Road	5600	12900	15100	18000		15.71%
	S of Alico Road	5700	7200	9400	9900		7.14%
Total		11300	20100	24500	27900		11.96%
<u>I-75 Growth Rate (Corkscrew Road to Daniels Parkway)</u>							
I-75	S of Alico Road	59000	76000	78000	72000	71000	2.08%
	S of Daniels Parkway	70000	86000	83000	79000	66500	-0.57%
Total		129000	162000	161000	151000	137500	0.71%

**Exhibit IV.B.2.a
Sanitary Sewer**

The Florida Gulf Coast Technology & Research Park Comprehensive Plan Amendment property is located within Lee County Utilities franchise service area for wastewater treatment. The off-site wastewater treatment will be provided by the City of Fort Myers South Wastewater Treatment Plant.

Current and Projected LOS Standard

According to the Lee County Utilities' availability to serve the project, the current Level of Service (LOS) is determined as adequate. The adopted LOS standard for facilities serving the site is 100 gallons per day (GPD) per person, which is the standard to be applied to this project. The projected 2030 LOS under the existing land use designation and proposed land use designation shall both be at an adequate level. In addition, per the 2009 Lee County Concurrency Report, the provided flow data and capacity information of the Lee County Utilities Wastewater Treatment Facilities indicated that there was no apparent concurrency level of service problems anticipated for the year 2009 and beyond.

Projected Wastewater Flow and Methodology

Outlined below are the projected wastewater flows and treatment requirements for anticipated demands under the existing land use designation and the proposed land use designation.

Wastewater Flow Projections		(Year 2030)
Phase/Land Use	Wastewater Generation (MGD)	Total Off-Site Wastewater Treatment (MGD)
Existing FLUM (Tradeport)		
Industrial (550,000 s.f.) Office (100,000 s.f.)	0.03 (Industrial) 0.045 (Office)	0.08
Proposed FLUM		
Retail (700,000 s.f.) Hotel (240 rooms)	0.21 (Retail) 0.072 (Hotel)	0.28

Wastewater flow projections were developed based upon a project build-out and land uses for the existing and proposed land use designations. The table below summarizes the individual demand rates that were used based upon the Lee County Utilities Operation Manual and F.A.C. Chapter 64E-6.

Wastewater Demand

Land Use	Persons per Land Use	Unit	Average Daily Flow (GPD)	Peak Hour Flow (GPM) * Peak Factor = 3.0
Existing FLUM (Tradeport)				
Industrial	15 GPD per Employee per 8-hour shift	846 Employees (Assume 40% of employees per 8-hour shift & (2) 8-hour shifts per day)	10,152	21.2
Office	15 GPD per 100 S.F.	100,000 S.F.	15,000	31.2
TOTALS			25,152	52.4
Proposed FLUM				
Retail	0.1 GPD per S.F.	700,000 S.F.	70,000	145.8
Hotel Rooms	1.00 persons per room/ 100 GPD per person	240 rooms	24,000	50.0
TOTALS			94,000	195.8

* Peak Hour Flow = (Average Daily Flow/1440) * Peak Factor

Assumptions

Water Demand = 100 G.P.D. per person
 Hotel Rooms = 100 G.P.D. per room
 Retail = 15 G.P.D. per S.F.
 Office = 15 G.P.D. per 15 S.F.
 Industrial = 15 G.P.D. per employee per 8-hour shift
 Peak Factor = 3.0 (Lee County Utilities Operation Manual, Sanitary Sewer Systems, Section 6)
 for Total ADF between 0.05 to 0.25 MGD

Sources

Lee County Utilities Operations Manual, February 2000
 Florida Administrative Code FAC 64E-6.008, Table 1

Existing Infrastructure

According to Lee County Utilities records, there is an existing 10" sanitary sewer force main along the eastern side of Ben Hill Griffin Parkway, extending north from the intersection with Alico Road and located within the public Right-of-Way. At the northeast quadrant of the intersection of Alico Road and Ben Hill Griffin Parkway, the 10" PVC force main connects to a 12" PVC force main and then becomes a 14" HDPE force main extending south along the east side of Ben Hill Griffin Parkway. It is anticipated that the proposed project will connect to this force main via on-site sewer lift station (s) in order to provide transmission of the projected wastewater flow to the wastewater treatment facility. An on-site gravity

sewer system will also be installed to carry the wastewater flow to the on-site lift station (s). At the time of development order review, a detailed hydraulic analysis of the project's proposed lift station (s) connection to the Lee County Utilities' force main system shall be conducted to ensure no adverse impacts occur.

Service Availability Confirmation

A letter has been sent to Lee County Utilities requesting confirmation of their ability to provide wastewater treatment for this project. A copy of the information sent to Lee County Utilities is provided within this section.

**Exhibit IV.B.2.b
Potable Water**

The Florida Gulf Coast Technology & Research Park Comprehensive Plan Amendment property is located within Lee County Utilities franchise service area for potable water supply. The supply of potable water service will be provided through Lee County Utilities' Corkscrew Water Treatment Plant.

Current LOS Standard

According to the Lee County Utilities' availability to serve the project, the current Level of Service (LOS) is determined as adequate. The adopted LOS standard for facilities serving the site is 100 gallons per day (GPD) per person, which is the standard to be applied to this project. The projected 2030 LOS under the existing land use designation and proposed land use designation shall both be at an adequate level. In addition, per the 2009 Lee County Concurrency Report, the provided flow data and capacity information of the Lee County Utilities Water Treatment Facilities indicated that there was no apparent concurrency level of service problems anticipated for the year 2009 and beyond.

Projected Potable Water Demands and Methodology

Outlined below are the projected wastewater flows and treatment requirements for anticipated demands under the existing land use designation and the proposed land use designation.

Potable Water Demand		
Phase/Land Use	Potable Water Demand (MGD)	Total Water Demand (MGD)
Existing FLUM (Tradeport)		
Industrial (550,000 s.f.) Office (100,000 s.f.)	0.025 (Industrial) 0.0375 (Office)	0.06
Proposed FLUM		
Retail (700,000 s.f.) Hotel (240 rooms)	0.17 (Retail) 0.06 (Hotel)	0.23

Potable water demand projections were developed based upon a project build-out and proposed land uses for the existing and proposed land use designation. The table below summarizes the individual demand rates that were used based upon the Lee County Utilities Operation Manual and F.A.C. Chapter 64E-6.

Potable Water Demand

Land Use	Persons per Land Use	Unit	Average Daily Flow (GPD)	Peak Hour Flow* (GPM) Peak Factor = 2.5
Existing FLUM (Tradeport)				
Industrial	15 GPD per Employee per 8-hour shift	846 Employees (Assume 40% of employees per 8-hour shift & (2) 8- hour shifts per day)	10,152	17.6
Office	15 GPD per 100 S.F.	100,000 S.F.	15,000	26.0
TOTALS			25,152	43.6
Proposed FLUM				
Retail	0.1 GPD per S.F.	700,000 S.F.	70,000	121.5
Hotel Rooms	1.00 persons per room/ 100 GPD per person	240 rooms	24,000	41.7
TOTALS			94,000	163.2

* Peak Hour Flow = (Average Daily Flow/1440) * Peak Factor

Assumptions

Water Demand = 100 G.P.D. per person

Hotel Rooms = 100 G.P.D. per room

Retail = 15 G.P.D. per S.F.

Office = 15 G.P.D. per 100 S.F.

Industrial = 15 G.P.D. per employee per 8-hour shift

Peak Factor = 2.5 (Lee County Utilities Operation Manual, Water Systems, Section 5)

Sources

Lee County Utilities Operations Manual, February 2000

Florida Administrative Code FAC 64E-6.008, Table 1

Existing Infrastructure

According to Lee County Utilities records, there is an existing 36" Ductile Iron (D.I.) water main along the north side of Alico Road within the public Right-of-Way adjacent to this project's property line. There is also an existing 16" D.I. water main which connects to the existing 36" D.I. water main at the northwest quadrant of the intersection of Alico Road and Ben Hill Griffin Parkway. This 16" D.I. water main extends north along the west side of Ben Hill Griffin Parkway within the public Right-of-Way. It is anticipated that the proposed project will connect to either or both of these water mains via on-site water mains in order to provide potable water supply to the proposed users. At the time of development

order review, a detailed analysis of the project's on-site water main system and connection to the Lee County Utilities' system shall be conducted to ensure proper sizing of the on-site water mains to supply the needed demand. The current capacity of the Corkscrew Water Treatment Plant is 15 MGD.

Service Availability Confirmation

A letter has been sent to Lee County Utilities requesting confirmation of their ability to provide potable water supply for this project. A copy of the information sent to Lee County Utilities is provided within this section.

Availability of Reclaimed Water for Supply for Irrigation

The availability of reclaimed water was investigated as part of the water use permit application/review process for the overall project site, which included the property outlined in this Lee Plan Amendment application. Reclaimed water is not currently available to the site. The Limiting Conditions 22 and 25 of the water use permit (Permit No. 36-05714-W) require the permittee to continue investigating the availability of reclaimed water. Should reclaimed water become available, the water use permit shall be modified accordingly.

Water Conservation Measures

For the purpose of potable water conservation, the project shall utilize low water use plumbing fixtures and other water conserving devices. Actual reductions in usage will vary depending on type and manufacturer of the fixtures and devices.

For the purpose of non-potable water conservation, the project shall utilize xeriscape principles and drought tolerant plants within the landscaping design of open areas.

Exhibit IV.B.2.c

Surface Water/Drainage Basins

The Florida Gulf Coast Technology & Research Park Comprehensive Plan Amendment property is located within the Six Mile Cypress Watershed. This watershed encompasses approximately 55 square miles and is relatively flat, sloping west and southwest from an elevation of 25' NGVD to an elevation of 15' NGVD with an average slope of 1.4 feet per mile or 0.03 percent.

The watershed is bounded on the north by State Road 82, on the south by Alico Road, on the east by Gunnery Road and the "Six Mile Ordinance" boundary, and on the west by the Six Mile Cypress Parkway. There are eleven (11) sub-watersheds within the Six Mile Cypress Watershed. The majority of the sub-watersheds drain into the Six Mile Slough prior to outfall into the Ten Mile Canal. The Briarcliff and Alico sub-watersheds bypass the Slough and outfall directly into the Ten Mile Canal. The Florida Gulf Coast Technology & Research Park Comprehensive Plan Amendment property lies specifically within the Alico sub-watershed. The Alico sub-watershed is the southernmost basin within the Six Mile Watershed and discharges directly to the Ten Mile Canal via mostly roadside ditches and channels. Most of the Florida Gulf Coast Technology & Research Park DRI property also lies within the Alico sub-watershed, with the northwest portion located in the Jetport sub-watershed, which contributes to the Briarcliff sub-watershed.

Current and Projected LOS Standard

The current Level of Service (LOS) is identified as the 25 year, 3-day storm event, which defines that the existing surface water management system in the unincorporated areas of the County will be sufficient to prevent the flooding of designated evacuation routes from the 25 year, 3-day storm event for more than 24 hours. The adopted LOS standard for surface water management is the 25 year, 3-day storm event, which is also applied to the Florida Gulf Coast Technology & Research Park Comprehensive Plan Amendment property. The projected 2030 LOS under the existing land use designation and proposed land use designation shall both be at an adequate level, utilizing the 25 year, 3-day storm event criteria in the design of the proposed surface water management infrastructure. In addition, the subject property is included in an existing approved conceptual Environmental Resource Permit from South Florida Water Management District in which the details of the backbone water management system has been established. Considering the approved permit, the subject property is considered concurrent with the LOS standards set forth in The Lee Plan.

Existing Conditions/Infrastructure

The subject Comprehensive Plan Amendment property is vacant, unimproved land with a combination of wetland and upland vegetative communities. Please

refer to Section IV.C for a detailed discussion on the FLUCFCS communities within the project site. The existing surface water flow direction is generally from northeast to the south and west, within the subject property. There is a roadside ditch along the north site of Alico Road which conveys surface water flow to the west through an existing box culvert under the intersection with Ben Hill Griffin Parkway and ultimately to the Ten Mile Canal. There are also multiple culverts under Ben Hill Griffin Parkway, north of Alico Road, which convey storm water flow from eastern lands to the west.

Overview of Proposed Surface Water Management Conditions

The subject Comprehensive Plan Amendment property is part of a larger DRI project which is encompassed by an approved conceptual South Florida Water Management Environmental Resource Permit No. 36-05238-P. The approved permit established control elevations using data obtained from onsite hydrobiological indicator elevations, and surrounding control elevations. This Comprehensive Plan Amendment property is located within basins 3 (B-3) and 4 (B-4) of the approved permit. The water management system will utilize a system of lakes for water quality treatment and flood attenuation. Discharges from the water management system will be regulated by a series of water control structures. The control structures will provide the required water quality treatment volume and be sized to limit discharge runoff at a rate not to exceed the allowable discharge rate of 37 cubic feet per second per square mile (CSM) specified by Lee County for the Six Mile Cypress Watershed. Control structures will also be utilized to maintain water levels in the detention facilities to maintain or restore the hydroperiod in the adjacent wetlands and flow-ways. Since the subject Comprehensive Plan Amendment property is part of an existing permit approval from South Florida Water Management District and complies with chapters 17-3, 17-40 and 17-302 of the Florida Statutes and Rule 40E-4 of the Florida Administrative Code, this site is considered concurrent with the Level of Service Standards set forth in The Lee Plan.

Exhibit IV.B.2.d and e
Existing and Future Conditions Analysis

d. Parks, Recreation and Open Space

Policy 95.1.3

The Proposed amendment to the Tradeport Land Use Category will not impact existing or future conditions related to Parks, Recreation or Open Space. Lee County does not assess impact fees for commercial development for those facilities, but does apply impact fees for residential uses in these categories. No residential land uses are permitted within the Tradeport Land Use Category.

e. Public Schools

The proposed amendment only proposes to permit additional commercial uses in the Tradeport Future Land Use Category. No residences or schools are permitted in the Lee Plan Land Use Category; therefore no impacts to existing and future conditions will result from the proposed amendment.

Exhibit IV.B.3
Agency Letters of Adequacy/Provision



GradyMinor

Civil Engineers • Land Surveyors • Planners • Landscape Architects

December 29, 2009

Captain James C. Nygaard, MBA
Lee County Sheriffs Office
Administration Bureau
14750 Six Mile Cypress Parkway
Fort Myers, FL 33912

Re: Florida Gulf Coast Technology & Research Park: Lee Plan Amendment
STRAP #s 01-46-25-00-00001.0020, 02-46-25-00-00001.0050, 02-46-25-00-00001.005A
and 02-46-25-00-00001.0080
Request for Letter of Service Availability

Captain Nygaard:

As part of Florida Gulf Coast Technology & Research Park project, the applicant is pursuing a Lee County Comprehensive Plan Amendment for a portion (107 acres) of the DRI site. Per the application requirements for the Comprehensive Plan Amendment, the applicant must obtain a letter from the support facilities provider for law enforcement services outlining the availability to serve the proposed project. Specifically, the letter needs to address the following:

1. Description of existing support facilities and any proposed facilities.
2. Estimated response times.

The proposed Comprehensive Plan Amendment requests to amend the Tradeport future land use designation to permit community and regional commercial development in addition to the corner-store commercial presently allowed, with a maximum of 700,000 square feet for the 107 +/- acre site.

Also attached with this letter are the following:

1. General Location Map

Please review the provided information to assist with providing a service availability letter for this Comprehensive Plan Amendment application. If you have any questions or need additional items, please call our office.

Sincerely,

Elizabeth A. Fountain, P.E.

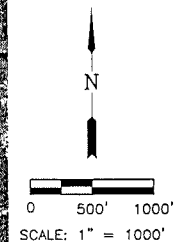
Vice President / Project Manager

cc. Bill Murray, Benderson Development Company

GM file
Q. Grady Minor & Associates, P.A.
11940 Fairway Lakes Drive, Suite 6
Fort Myers, FL 33907
Office 239.690.4380

Ph. 239-690-4380 • Fx.: 239-768-0291
FB 0005151 • LB 0005151 • LC 26000266
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Fort Myers, FL 33907
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GM file
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11940 Fairway Lakes Drive, Suite 6
Fort Myers, FL 33907
Office 239.690.4380
FB 0005151 • LB 0005151 • LC 26000266
www.gradyminor.com



LEGEND

[illegible]

DESIGNED BY:	QOMA
DRAWN BY:	SU
APPROVED:	DWA
JOB CODE:	FACT750-DB
SCALE: 24x36 1" = XX'	
11x12 = 1.000'	



Civil Engineers • Land Surveyors • Planners • Landscape Architects
CERT. OF AITH. EB 0005151 CERT. OF AITH. LB 0005151 BUSINESS LC 26000205
www.GradyMinor.com O. Grady Minor and Associates, P.A.

FLORIDA GULF COAST TECHNOLOGY AND RESEARCH PARK

GENERAL LOCATION MAP
DATE AERIAL FLOWN: JANUARY 2008

MUNICIPALITY:	LOS ANGELES
SEC/TWR/RUN:	01, 02/468/202
DATE:	DECEMBER 2008
FILE NAME:	GENERAL LOCATION MAP
SHEET 1 OF 1	



GradyMinor

Civil Engineers • Land Surveyors • Planners • Landscape Architects

December 29, 2009

Mr. Thomas M. Beard
Fire Marshal
San Carlos Park Fire Protection and Rescue Service District
19591 Ben Hill Griffin Parkway
Fort Myers, FL 33913

Re: Florida Gulf Coast Technology & Research Park: Lee Plan Amendment
STRAP #s 01-46-25-00-00001.0020, 02-46-25-00-00001.0050, 02-46-25-00-00001.005A
and 02-46-25-00-00001.0080
Request for Letter of Service Availability

Mr. Beard:

As part of Florida Gulf Coast Technology & Research Park project, the applicant is pursuing a Lee County Comprehensive Plan Amendment for a portion (107 acres) of the DRI site. Per the application requirements for the Comprehensive Plan Amendment, the applicant must obtain a letter from the support facilities provider for fire protection and emergency services outlining the availability to serve the proposed project. Specifically, the letter needs to address the following:

1. Description of existing support facilities and any proposed facilities.
2. Estimated response times.
3. Description of Emergency medical service provisions.

The proposed Comprehensive Plan Amendment requests to amend the Tradeport future land use designation to permit community and regional commercial development in addition to the corner-store commercial presently allowed, with a maximum of 700,000 square feet for the 107 +/- acre site.

Also attached with this letter are the following:

1. General Location Map

Please review the provided information to assist with providing a service availability letter for this Comprehensive Plan Amendment application. If you have any questions or need additional items, please call our office.

Sincerely,

Elizabeth A. Fountain, P.E.

Vice President / Project Manager

cc. Bill Murray, Benderson Development Company

Q. Grady Minor & Associates, P.A.

11940 Fairway Lakes Drive, Suite 6

Fort Myers, FL 33907

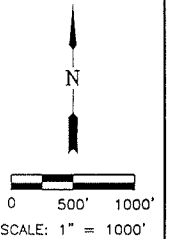
Ph. 239-690-4380 • Fx.: 239-768-0291

EB 0005151 • LB 0005151 • LC 26000266

File: 33907 GCTRPDR04 DP LEE PLAN AMENDMENT Lee Plan Amendment_LTR of Service Availability to San Carlos Park District

12.16.09.doc

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LEGEND

Revision	Date	Description

DESIGNED BY: DWA
 DRAWN BY: SU
 APPROVED: DWA
 JOB CODE: FOOTPLOT
 SCALE: 24x36" 1" = 30'
 11x17" = 1,000'

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FLORIDA GULF COAST TECHNOLOGY AND RESEARCH PARK

GENERAL LOCATION MAP
 DATE AERIAL FLOWN: JANUARY 2008

MUNICIPALITY: LEE COUNTY
 SHEET/PAIR: 01 / 02/488/208
 DATE: DECEMBER 2008
 FILE NAME: GENERAL LOCATION MAP
 SHEET 1 OF 1



GradyMinor

Civil Engineers • Land Surveyors • Planners • Landscape Architects

December 29, 2009

Ms. Melissa Bibeau
Utilities' Engineering Technician
Lee County Utilities
1500 Monroe Street, 3rd Floor
Fort Myers, FL 33901

Re: Florida Gulf Coast Technology & Research Park: Lee Plan Amendment
STRAP #s 01-46-25-00-00001.0020, 02-46-25-00-00001.0050, 02-46-25-00-00001.005A
and 02-46-25-00-00001.0080: **Request for Letter of Availability**

Ms.Bibeau:

As part of Florida Gulf Coast Technology & Research Park project, the applicant is pursuing a Lee County Comprehensive Plan Amendment for a portion (107 acres) of the DRI site. Per the application requirements for the Comprehensive Plan Amendment, the applicant must obtain a letter from the utility service provider for potable water service and wastewater treatment outlining the availability to serve the proposed project's demands. The letter also needs to address the following:

1. Existing infrastructure, if any, in the immediate area with the potential to serve the subject property.
2. Improvements/expansions currently programmed in the 5 year CIP, 6-10 year CIP, and long range improvements,

The proposed Comprehensive Plan Amendment requests to amend the Tradeport future land use designation to permit community and regional commercial development in addition to the corner-store commercial presently allowed, with a maximum of 700,000 square feet for the 107 +/- acre site. Outlined below are the potable water and wastewater treatment demands per the existing FLUM designation and the proposed FLUM designation.

**Potable Water
Demand**

Phase/Land Use	Potable Water Demand (MGD)	Total Water Demand (MGD)
Existing FLUM (Tradeport)		
Industrial (550,000 s.f.)	0.025 (Industrial)	0.06
Office (100,000 s.f.)	0.0375 (Office)	
Proposed FLUM		
Retail (700,000 s.f.)	0.17 (Retail)	0.23
Hotel (240 rooms)	0.06 (Hotel)	

Q. Grady Minor & Associates, P.A.
11940 Fairway Lakes Drive, Suite 6
Fort Myers, FL 33913

Ph. 239-690-4380 • Fx.: 239-768-0291
EB 0005151 • LB 0005151 • LC 26000266
www.gradymminor.com

Land Use	Persons per Land Use	Unit	Average Daily Flow (GPD)	Peak Hour Flow (GPM)
Existing FLUM (Tradeport)				
Industrial	15 GPD per Employee per 8-hour shift	846 Employees (Assume 40% of employees per 8-hour shift & (2) 8- hour shifts per day)	10,152	17.6
Office	15 GPD per 100 S.F.	100,000 S.F.	15,000	26.0
TOTALS			25,152	43.67
Proposed FLUM				
Retail	0.1 GPD per S.F.	700,000 S.F.	70,000	121.5
Hotel Rooms	1.00 persons per room/ 100 GPD per person	240 rooms	24,000	41.7
TOTALS			94,000	163.19

Assumptions

Water Demand = 100 G.P.D. per person
Hotel Rooms = 100 G.P.D. per room
Retail = 15 G.P.D. per S.F.
Office = 15 G.P.D. per 100 S.F.
Industrial = 15 G.P.D. per employee per 8-hour shift
Peak Factor = 2.5 (Lee County Utilities Operation Manual, Water Systems, Section 5)

Sources

Lee County Utilities Operations Manual, February 2000
Florida Administrative Code FAC 64E-6.008, Table 1

**Wastewater
Flow Projections**

Phase/Land Use	Wastewater Generation (MGD)	Total Off-Site Wastewater Treatment (MGD)
Existing FLUM (Tradeport)		
Industrial (550,000 s.f.) Office (100,000 s.f.)	0.03 (Industrial) 0.045 (Office)	0.08
Proposed FLUM		
Retail (700,000 s.f.) Hotel (240 rooms)	0.21 (Retail) 0.072 (Hotel)	0.28

The assumptions used to project the wastewater demands are the same as used to project the potable water demands. However, the peak factor used to project the peak hour flow is 3.0 per the Lee County Utilities Operations Manual, Sanitary Sewer Systems, Section 6 for a total

Ms. Melissa Bibeau
Lee County Utilities
Re: Florida Gulf Coast Technology & Research Park Comprehensive Plan Amendment
December 29, 2009
Page 3

ADF between 0.05 to 0.25 MGD.

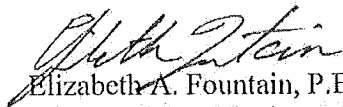
Also attached with this letter are the following:

1. Lee County Utilities Request for Letter of Availability Form; and
2. General Location Map

Please review the provided information to assist with providing a service availability letter for this Comprehensive Plan Amendment application.

If you have any questions or need additional items, please call our office.

Sincerely,


Elizabeth A. Fountain, P.E.
Vice President / Project Manager

cc. Bill Murray, Benderson Development Company
GM file



LEE COUNTY
SOUTHWEST FLORIDA

LEE COUNTY UTILITIES
REQUEST FOR LETTERS OF AVAILABILITY

DATE: DECEMBER 29, 2009

TO: Melissa Bibeau
Utilities' Engineering Technician

FROM: ELIZABETH FOUNTAIN

FIRM: GRADYMINOR

ADDRESS: 11940 FAIRWAY LAKES DRIVE

ADDRESS: SUITE# 6, -

PHONE#: (239)690-4380 FAX: (239)768-0291

E-MAIL ADDRESS: EFOUNTAIN@GRADYMINOR

PROJECT NAME: FLORIDA GULF COAST TECHNOLOGY & RESEARCH PARK DRI

PROJECT ID (IF APPLICABLE):

STRAP #: 01-46-25-00-00001.0020, 02-46-25-00-00001.005A,

LOCATION/SITE ADDRESS: NE CORNER OF ALICO ROAD AND BEN HILL GRIFFIN PARKWAY

PURPOSE OF LETTER:

- ☐ DEVELOPMENT ORDER SUBMITTAL ☐ FINANCING ☐ EFFLUENT REUSE
☐ PERMITTING OF SURFACE WATER MANAGEMENT (SOUTH FLORIDA WATER MANAGEMENT DISTRICT)
☒ OTHER: (PLEASE SPECIFY) LEE PLAN AMENDMENT

PLANNED USE:

- ☒ COMMERCIAL ☒ INDUSTRIAL ☐ RESIDENTIAL - (☐ SINGLE-FAMILY ☐ MULTI-FAMILY)
☐ OTHER: (PLEASE SPECIFY) _____

PLANNED # OF UNITS/BUILDINGS: TBD

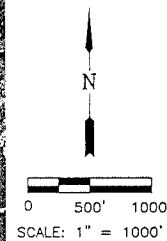
TOTAL SQUARE FOOTAGE (COMMERCIAL/INDUSTRIAL) TTH

AVERAGE ESTIMATED DAILY FLOW (GPD): 94,000GPD (☒ WATER ☒ WASTE-WATER ☐ REUSE)

PLEASE SHOW CALCULATION USED TO DETERMINE AVERAGE ESTIMATED DAILY FLOW (GPD) PER CRITERIA
SET FORTH IN LEE COUNTY UTILITIES OPERATIONS MANUAL, SECTION 5.2: PLEASE SEE ATTACHED

Calculations.

Please e-mail the completed form to bibeamb@leegov.com . If you are unable to e-mail the completed form, please fax to (239)479-8709. If you should have any questions or require assistance, please feel free to call our office at (239)479-8525.



LEGEND

[illegible]

DESIGNED BY:	GOMA
DRAWN BY:	SU
APPROVED:	DWA
JOB CODE:	FOOTPRINT
SCALE:	24x36 1" = 30'



Civil Engineers • Land Surveyors • Planners • Landscape Architects
 CERT. OF AUTH. EB 0005151 CERT. OF AUTH. LB 0005151 BUSINESS LIC. 20080206
 www.GradyMinor.com Q. Grady Minor and Associates, P.A.

Bonita Springs	239.947.1144
Fort Myers	239.690.4380
North Fort	941.426.5858
Naples	239.444.2397

FLORIDA GULF COAST TECHNOLOGY AND RESEARCH PARK

GENERAL LOCATION MAP
DATE AERIAL FLOWN: JANUARY 2008

MUNICIPALITY:	LEE COUNTY
REC/TFR/BOX:	01, 02/488/25E
DATE:	DECEMBER 2008
FILE NAME:	
GENERAL LOCATION NAME:	
SHEET 1 OF 1	

FLORIDA GULF COAST TECHNOLOGY AND RESEARCH PARK
Section 1, 2; Township 46 South; Range 25 East
Lee County, Florida

Comprehensive Plan Amendment Application

IV. Amendment Support Documentation

Section C - Environmental Impacts

Section D – Impacts on Historical Resources

January 2010

C. ENVIRONMENTAL IMPACTS

1. A map of the Plant Communities as defined by the Florida Land Use Cover and Classification system (FLUCCS).

Please see the attached FLUCFCS Map with Aerial (EXHIBIT IV.C.1) for community locations. The vegetation communities on site were mapped according to the Florida Land Use, Cover and Forms Classification System (FLUCFCS) (Florida Department of Transportation, 1999). The FLUCFCS lines and wetland boundary line work were received from QGM as noted on the attached maps. In the Florida Gulf Coast Technology and Research Park DRI Application, it was noted that the wetland boundaries were field delineated by Passarella and Associates and subsequently formally verified and approved by the South Florida Water Management District in 2003. Subsequently, Wilson Miller staff verified habitat quality and FLUCFCS designations for the property in January 2004.

Boylan staff conducted a follow-up site inspection in December 2009 to field verify habitat quality and vegetation designations for the property using the Florida Land Use, Cover and Forms Classification System (FLUCFCS) (Florida Department of Transportation, 1999) and modifiers listed below. The mapping is superimposed on 2008 digital aerial photographs. Acreages were approximated using AutoCAD (2008 version).

The vegetation communities on the property are primarily composed of Pasture land, Pine Flatwoods, Hydric Pine Flatwoods, Cypress Wetlands and Exotic Wetland Hardwoods. These community types are not unusual, rare or unique and can commonly be found throughout the region. Exotic vegetation was found throughout the site in various densities. FLUCFCS code modifiers are used to indicate the approximate extent of melaleuca (*Melaleuca quinquenervia*) and/or Brazilian pepper (*Schinus terebinthifolius*) in the canopy and understory. The following suffixes were used to indicate approximate percentage of exotic species for each area mapped.

E1 = Exotics 10-24%
E2 = Exotics 25-49%
E3 = Exotics 50-75%
E4 = Exotics >75%

Areas mapped with greater than 85% coverage of exotics were mapped according to the specific FLUCFCS description for either Melaleuca (*Melaleuca quinquenervia*) FLUCFCS 424 or Brazilian pepper (*Schinus terebinthifolius*) FLUCFCS 422. For the exotic communities that are considered wetlands, the following modifier was used:

M = melaleuca (*Melaleuca quinquenervia*)

P = Brazilian pepper (*Schinus terebinthifolius*)

The following is a discussion of the existing land uses and vegetative associations found on site. The following table summarizes the FLUCFCS communities discussed below.

411 Pine Flatwoods (40.10± ac.)

This upland habitat type occupies 40.01± acres of the property. Canopy vegetation is slash pine (*Pinus elliottii*), Cabbage Palm (*Sabal palmetto*), with various amounts of Brazilian pepper (*Schinus terebinthifolius*) and Melaleuca (*Melaleuca quinquenervia*). Sub-canopy includes Brazilian pepper (*Schinus terebinthifolius*), scattered Dahoon holly (*Ilex cassine*), ear leaf acacia (*Acacia auriculiformis*), and java plum (*Syzygium cumini*). Ground cover includes saw palmetto (*Serenoa repens*), myrsine (*Rapanea punctata*), wax myrtle (*Myrica cerifera*), saltbush (*Atriplex pentandra*), buckthorn (*Bumelia reclinata*), Caesar weed (*Urena lobata*), Chocolate weed (*Melochia corchorifolia*), foxtail (*Setaria italica*), and dog fennel (*Eupatorium capillifolium*). Vines include Virginia creeper (*Parthenocissus quinquefolia*), poison ivy (*Toxicodendron radicans*), love vine (*Cassytha filiformis*), catbrier (*Smilax spp.*) and grapevine (*Vitis rotundifolia*).

514 Ditch (4.18± ac.)

This habitat type occupies approximately 4.18± acres of the property. These areas describe linear surface waters such as man-made ditches and swales. Vegetation found in these areas include duckweed (*Lemna trinervis*), torpedo grass (*Panicum repens*), primrose willow (*Ludwigia spp.*), and cattails (*Typha domingensis*).

619M Exotic Wetland Hardwoods (40.42± ac.)

This wetland habitat type occupies approximately 40.42± acres of the property. The canopy is dominated by melaleuca (*Melaleuca quinquenervia*) with associated hydric soils. Other vegetation noted includes cabbage palm (*Sabal palmetto*), yellow-eyed grass (*Xyris spp.*), Climbing hemp weed (*Mikania scandens*), wax myrtle (*Myrica cerifera*), saltbush (*Atriplex pentandra*), spade leaf (*Centella asiatica*), beak rush (*Rhynchospora spp.*), frog fruit (*Phyla nodiflora*). The ground cover is sparse due to the dense coverage of exotics.

621 Cypress (1.48± ac.)

This wetland habitat type occupies approximately 1.48± acres of the property. The canopy is dominated by bald cypress (*Taxodium spp.*). The sub-canopy contains cypress (*Taxodium spp.*), Laurel oak (*Quercus laurifolia*), swamp bay (*Persea palustris*), dahoon holly (*Ilex cassine*), cabbage palm (*Sabal palmetto*), wax myrtle (*Myrica cerifera*), Carolina willow (*Salix caroliniana*), and pop ash (*Osmanthus americanus*) with various amounts of Brazilian pepper (*Schinus terebinthifolius*) and Melaleuca (*Melaleuca quinquenervia*). The ground cover includes swamp fern (*Blechnum serrulatum*), royal fern (*Osmunda regalis*), arrowhead (*Sagittaria spp.*), fire flag (*Thalia geniculata*), pickerelweed (*Pontederia cordata*), buttonbush (*Cephalanthus occidentalis*), saw grass

(*Cladium jamaicense*), and maidencane (*Panicum hemitomon*). Other vegetation noted includes water-hyssop (*Bacopa caroliniana*), torpedo grass (*Panicum repens*), Rosy-camphor weed (*Pluchea rosea*), Climbing hemp vine (*Mikania scandens*), Penny-wort (*Hydrocotyle umbellata*), musky mint (*Hyptis alata*), frog-fruit (*Phyla nodiflora*), spike rush (*Eleocharis spp.*), smartweed (*Polygonum punctatum*), day flower (*Commelina diffusa*), and beak rush (*Rhynchospora spp.*).

Various epiphytes including Wild pines (*Tillandsia spp.*), golden polypody (*Phlebodium aureum*), shoestring fern (*Vittaria lineate*), and Florida butterfly orchid (*Encyclia tampensis*) were also observed in these communities.

624 Cypress-Pine-Cabbage Palm (7.10± ac.)

This wetland habitat type occupies approximately 7.10± acres of the property. The canopy contains slash pine (*Pinus elliottii*), cypress (*Taxodium spp.*), and cabbage palm (*Sabal palmetto*). The sub-canopy contains cypress (*Taxodium spp.*), dahoon holly (*Ilex cassine*), cabbage palm (*Sabal palmetto*), and wax myrtle (*Myrica cerifera*) with various amounts of Brazilian pepper (*Schinus terebinthifolius*) and Melaleuca (*Melaleuca quinquenervia*). The ground cover includes swamp fern (*Blechnum serrulatum*), arrowhead (*Sagittaria spp.*), pickerelweed (*Pontederia cordata*), saw grass (*Cladium jamaicense*), and maidencane (*Panicum hemitomon*). Other vegetation noted includes torpedo grass (*Panicum repens*), Rosy-camphor weed (*Pluchea rosea*), Climbing hemp vine (*Mikania scandens*), musky mint (*Hyptis alata*), frog-fruit (*Phyla nodiflora*), smartweed (*Polygonum punctatum*), day flower (*Commelina diffusa*), and beak rush (*Rhynchospora spp.*).

625 Hydric Pine Flatwoods 1.50± ac.

This wetland community type occupies approximately 1.50± acres of the property. The canopy contains slash pine (*Pinus elliottii*) with scattered cabbage palm (*Sabal palmetto*) and (*Melaleuca quinquenervia*). The sub-canopy contains cabbage palm (*Sabal palmetto*), saltbush (*Atriplex pentandra*), wax myrtle (*Myrica cerifera*) with various amounts of Brazilian pepper (*Schinus terebinthifolius*) and Melaleuca (*Melaleuca quinquenervia*). The ground cover includes scattered saw grass (*Cladium jamaicense*), blue maidencane (*Amphicarpum muhlenbergianum*), Rosy-camphor weed (*Pluchea rosea*), Climbing hemp vine (*Mikania scandens*), Penny-wort (*Hydrocotyle umbellata*), Penny-wort (*Hydrocotyle umbellata*), frog-fruit (*Phyla nodiflora*), smartweed (*Polygonum punctatum*), day flower (*Commelina diffusa*), tickseed (*Coreopsis floridana*), yellow-eyed grass (*Xyris spp.*), love grass (*Ergrostis spp.*), witch grass (*Dichanthelium spp.*), and (*Rhynchospora spp.*).

740 Disturbed Land (0.64± ac.)

This upland area occupies approximately 0.64± acres of the property and consists of disturbed lands that were previously cleared during past mining activities. The sub-canopy vegetation is widely scattered slash pine (*Pinus elliottii*), Cabbage Palm (*Sabal palmetto*), Brazilian pepper (*Schinus terebinthifolius*), Melaleuca (*Melaleuca quinquenervia*). The ground cover includes dog fennel (*Eupatorium capillifolium*), ragweed (*Ambrosia trifida*), caesar weed (*Urena lobata*), Canadian horsetweed (*Conyza*

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canadensis), hairy beggar-ticks (*Bidens alba*), smutgrass (*Sporobolus sp.*), wild sensitive plant (*Senna marilandica*), St. Augustine grass (*Stenotaphrum secundatum*) and Bahia grass (*Paspalum notatum*).

7401 Disturbed Land, Hydric (1.91± ac.)

This wetland area occupies approximately 1.91± acres of the property. The sub-canopy vegetation consists of widely scattered slash pine (*Pinus elliottii*), Cabbage Palm (*Sabal palmetto*), Brazilian pepper (*Schinus terebinthifolius*), Melaleuca (*Melaleuca quinquenervia*). Vegetation noted in this area includes: torpedo grass (*Panicum repens*), Rosy-camphor weed (*Pluchea rosea*), Climbing hemp vine (*Mikania scandens*), Pennywort (*Hydrocotyle umbellata*), musky mint (*Hyptis alata*), frog-fruit (*Phyla nodiflora*), spike rush (*Eleocharis spp.*), smartweed (*Polygonum punctatum*), day flower (*Commelina diffusa*), witch grass (*Dichanthelium spp.*), and beak rush (*Rhynchospora spp.*).

742 Borrow Area (0.23± ac.)

This community type occupies approximately 0.23± acres of the property. These open water habitats include areas of previously excavated areas with sparse vegetation including cattail (*Typha domingensis*) and torpedo grass (*Panicum repens*). Brazilian pepper (*Schinus terebinthifolius*) was present on the banks and adjacent spoil.

743 Spoil (0.14± ac.)

This upland community type occupies approximately 0.14± acres of the property. This community includes the spoil associated with the excavated ponds, and ditches on-site. Vegetation found on the spoil areas include Brazilian pepper (*Schinus terebinthifolius*), Spanish needles (*Bidens spp.*), cabbage plan (*Sabal palmetto*), Caesar weed (*Urena lobata*), and love grass (*Ergrostis spp.*).

814 Road (5.04± ac.)

Unpaved roads and trails occupy 5.04± acres of the property.

TABLE 1: FLUCFCS COMMUNITY TABLE

FLUCFCS Legend		
FLUCFCS Code	Community	Acres
411E2	Pine Flatwoods (25-49% Exotics)	9.30 Ac.±
411E3	Pine Flatwoods (50- 75% Exotics)	20.47 Ac.±
411E4	Pine Flatwoods(>75% Exotics)	10.33 Ac.±
514	Ditches	4.18 Ac.±
619M	Exotics Wetland Hardwoods-Melaleuca	40.42 Ac.±
621E2	Cypress, (25-49% Exotics)	1.48 Ac.±
624E3	Cypress-Pine-Cabbage Palm, (50-74% Exotics)	6.74 Ac.±
624E4	Cypress-Pine-Cabbage Palm,(>75% Exotics)	0.36 Ac.±
625E3	Hydric Pine Flatwoods (50-74% Exotics)	1.50 Ac.±

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740	Disturbed Lands	0.64 Ac.±
7401	Disturbed Lands, Hydric	1.91 Ac.±
742	Borrow Areas	0.23 Ac.±
743	Spoil Areas	0.14 Ac.±
814	Road	5.04 Ac.±
TOTAL		102.74 Ac.±

2. A map and description of the soils found on the property (identify the source of the information).

Soil Name and Map Symbol	Brief Soil Description
Hallandale Fine Sand (#6)	Nearly level, poorly drained soil on low, broad flatwood areas. Slopes are smooth and range from 0 to 2%.
Pompano Fine Sand (#10)	Nearly level, poorly drained soil on sloughs. Slopes are smooth to concave and range from 0 to 1%.
Boca Fine Sand (#13)	Nearly level, poorly drained soil on flatwoods. Slopes are smooth and range from 0 to 2%.
Pineda Fine Sand (#26)	Nearly level, poorly drained soil in sloughs. Slopes are smooth to slightly concave and range from 0 to 1%.
Pompano Fine Sand, Depressional (#27)	Nearly level, poorly drained soil in depressions. Slopes are concave and less than 1%.
Immokalee Sand (#28)	Nearly level, poorly drained soil in flatwood areas. Slopes are smooth to convex and range from to 2%.
Malabar Fine Sand (#34)	Nearly level, poorly drained soil on sloughs. Slopes are smooth to concave and range from 0 to 1%.
Pineda Fine Sand, Depressional (#73)	Nearly level, very poorly drained soil in depressions. Slopes are concave and are less than 1 %.

Please see the attached NRCS Soils Map (EXHIBIT IV.C.2) for soil locations on the property. All information was acquired from the FGDL and is from the NRCS Soils Maps.

3. A topographic map with property boundaries and 100-year flood prone areas indicated (as identified by FEMA).

Please see the attached topography map and FEMA Map provided by QGM.

4. A map delineating wetlands, aquifer recharge areas, and rare & unique uplands.

See attached Wetland Map (EXHIBIT IV.C.4) for extent and location of wetlands onsite.

No rare and unique uplands were found on the parcel.

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Aquifer recharge area information to be provided by QGM.

- 5. A table of plant communities by FLUCFCS with potential to contain species (plant and animal) listed by federal, state or local agencies as endangered, threatened or species of special concern. The table must include the listed species by FLUCFCS and the species status (same as FLUCFCS map).**

TABLE 3: LISTED SPECIES BY HABITAT WITH CURRENT STATUS

FLUCFCS Code	FLUCFCS Description	Common Name	Scientific Name	FDA	FWS	FWC
411	Pine Flatwoods	Eastern Indigo Snake	<i>Drymarchon corais couperi</i>	--	--	T
		Gopher Frog	<i>Rana areolata</i>	--	--	SSC
		Gopher Tortoise	<i>Gopherus polyphemus</i>	--	--	T
		Red-cockaded woodpecker	<i>Picoides borealis</i>	--	--	SSC
		Southeastern American Kestrel	<i>Falco sparverius paulus</i>	--	--	T
		Big Cypress Fox Squirrel	<i>Sciurus niger avicennia</i>	--	--	T
		Florida Black Bear	<i>Ursus americanus floridanus</i>	--	--	T
		Florida Panther	<i>Felis concolor coryi</i>	--	E	E
514	Ditch	Limpkin	<i>Aramus guarauna</i>	--	--	SSC
		Little Blue Heron	<i>Egretta caerulea</i>	--	--	SSC
		Roseate Spoonbill	<i>Ajaia ajaja</i>	--	--	SSC
		Snowy Egret	<i>Egretta thula</i>	--	--	SSC
		Tricolored Heron	<i>Egretta tricolor</i>	--	--	SSC
		Everglades Mink	<i>Mustela vison evergladensis</i>	--	--	T
		American Alligator	<i>Alligator mississippiensis</i>	--	--	SSC
621	Cypress	Gopher Frog	<i>Rana areolata</i>	--	--	SSC
		Little Blue Heron	<i>Egretta caerulea</i>	--	--	SSC
		Tricolored Heron	<i>Egretta tricolor</i>	--	--	SSC
		Snowy Egret	<i>Egretta thula</i>	--	--	SSC
		Arctic Peregrine Falcon	<i>Falco peregrinus tundrius</i>	--	--	E
		Limpkin	<i>Aramus guarauna</i>	--	--	SSC
		Wood Stork	<i>Mycteria americana</i>	--	--	E
		Everglades Mink	<i>Mustela vison evergladensis</i>	--	--	T
		Big Cypress Fox Squirrel	<i>Sciurus niger avicennia</i>	--	--	T
		Florida Panther	<i>Felis concolor coryi</i>	--	E	E
		Florida Black Bear	<i>Ursus americanus floridanus</i>	--	E	E
624	Pine/Cypress	Little Blue Heron	<i>Egretta caerulea</i>	--	--	SSC
625	Hydric Pine Flatwoods	Snowy Egret	<i>Egretta thula</i>	--	--	SSC
		Tricolored Heron	<i>Egretta tricolor</i>	--	--	SSC
		Arctic Peregrine Falcon	<i>Falco peregrinus tundrius</i>	--	--	T
		Everglades Mink	<i>Mustela vison evergladensis</i>	--	--	T
		Big Cypress Fox Squirrel	<i>Sciurus niger avicennia</i>	--	--	T
		Florida Panther	<i>Felis concolor coryi</i>	--	E	E
		Florida Black Bear	<i>Ursus americanus floridanus</i>	--	--	T
		American Alligator	<i>Alligator mississippiensis</i>	--	--	SSC
740	Disturbed Land	N/A		--	--	--
740H	Disturbed Land, Hydric	American Alligator	<i>Alligator mississippiensis</i>	--	--	SSC

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742	Borrow Area	Little Blue Heron	<i>Egretta caerulea</i>	--	--	SSC
		Snowy Egret	<i>Egretta thula</i>	--	--	SSC
		Tricolored Heron	<i>Egretta tricolor</i>	--	--	SSC
		Gopher Tortoise	<i>Gopherus polyphemus</i>	--	--	T
743	Spoil Area	Gopher Tortoise	<i>Gopherus polyphemus</i>	--	--	T
747	Berm	N/A		--	--	--
814	Road	N/A		--	--	--
832	Electrical Power Lines	American Alligator	<i>Alligator mississippiensis</i>	--	--	SSC
832H	Electrical Power Lines, Hydric	Little Blue Heron	<i>Egretta caerulea</i>	--	--	SSC
		Snowy Egret	<i>Egretta thula</i>	--	--	SSC
		Tricolored Heron	<i>Egretta tricolor</i>	--	--	SSC
		Wood Stork	<i>Mycteria americana</i>	--	--	E
		Limpkin	<i>Aramus guarauna</i>	--	--	SSC
		Florida Sandhill Crane	<i>Grus canadensis pratensis</i>	--	--	T
		Snail Kite	<i>Rostrhamus sociabilis</i>	--	--	E
		Everglades Mink	<i>Mustela vison evergladensis</i>	--	--	T

FWC-Florida Fish and Wildlife Conservation Commission

FWS-U.S. Fish and Wildlife Service

SSC-Species of Special Concern

T-Threatened

E-Endangered

SSC= Species of Special Concern

Protected Animals by Status

Audubon's Crested Caracara

The Audubon's Crested Caracara (*Polyborus plancus audubonii*) is a large raptor with a crest, naked face, heavy bill, elongate neck, and unusually long legs. This non-migratory species occurs in Florida as well as the southwestern U.S. and Central America. The adult is dark brownish black on the crown, wings, back, and lower abdomen. The lower part of the head, throat, upper abdomen, and under tail coverts are white, sometimes tinged with yellow; the breast and upper back are whitish, heavily barred with black. Juveniles have a similar color pattern but are brownish and buff colored with the breast and upper back streaked instead of barred. Sub adults resemble adults but are more brownish in color. Caracara nest in cabbage palms and are typically found in areas with open fields.

Eastern indigo snake

The eastern indigo snake (*Drymarchon corais*) is a non-poisonous glossy blue-black snake. It is the largest snake in the United States and can get up to nine feet long. This snake is often found in well drained scrub and sandhill habitats and is commonly considered to be associated with gopher tortoise burrows. The eastern indigo snake could potentially occur in the old agricultural lands and around the spoil areas on the property, however, the potential is low. The majority of these upland habitats provide no cover for itself or any prey species.

Florida sandhill crane

The Florida sandhill crane (*Grus canadensis pratensis*) is a long legged, long necked heron like bird. Sandhill cranes are the oldest known bird species still surviving. Cranes primarily utilize open freshwater wetlands however; they can also be found in bogs, meadows, grasslands, pine savannas, and cultivated lands.

Florida Panther

The Florida Panther (*Puma concolor coryi*) are solitary, elusive animals that are rarely observed in the wild. In fact only 80 to 100 panthers still remain in Florida and this is one of the most rare and endangered animals in the world. Panthers are large, unspotted cats with a long, dark-tipped tail. They are usually found in pinelands, hardwood hammocks, and swamp forests. The male panther's home range is on average 275 square miles.

Florida Black Bear

The Florida Black Bear (*Ursus americanus floridanus*) is a subspecies of the American Black Bear. These bears are black with a brown muzzle and some have a white spot on there chest. Black Bears habitat pine flatwoods, hardwood hammocks, upland sand pine, and scrub oak. A male black bears home range is approximately 66 square miles. While Black bears would not be found denning on site the area could be located within there home range.

American Alligator

The American alligator (*Alligator mississippiensis*) is the largest reptile in North America. Alligators have a short rounded snout and can reach up to 18 feet in length. Alligators primarily occupy freshwater swamps and marshes but are also found in rivers lakes and smaller bodies of water. Alligators could potentially occur in the ditches that surround the property.

Roseate Spoonbill

The Roseate Spoonbill (*Platalea ajaja*) is a pink and white bird with a bare head. Its bill is grey-green, spoon shaped, and flattened out like a spatula. It is the only spoonbill species that lives in the western hemisphere. These birds primarily diet on small fish however, crustaceans, insects, and aquatic plants may also be consumed. The roseate spoonbill primarily occupies estuaries, rivers, ponds, and marshes however it may utilize the onsite ditches for foraging.

Limpkin

The limpkin (*Aramus guarauna*) is a large brown with white spots wading bird that looks superficially like an ibis. Limpkins have a piercing cry kree-ow, kra-ow. This bird is found in freshwater marshes, along the edges of ponds, and lakes, and in wooded swamps along rivers. Its preferred food source is the apple snail however it will also eat mussels, insects, crustaceans, worms, frogs, lizards, and other types of snails. Limpkins could potentially utilize the onsite ditches as foraging areas.

Little Blue Heron

The little blue heron (*Egretta caerulea*) is a medium sized slender heron whose appearance dramatically different with age. First year herons are pure white while the adults appear slate blue. The little blue heron's diet includes small fish, amphibians, and aquatic invertebrates. Little blues occupy swamps, estuaries, rivers, ponds, and lakes and may be found utilizing the onsite ditches for foraging. This species was observed on site.

Reddish egret

The reddish egret (*Egretta rufescens*) is a large, slender egret with long legs and a long neck. There are two different distinct color patterns to these birds. The white morph is all white, while dark morph individuals have a rust colored head and neck feathers, and slate gray body feathers. This wading bird is found primarily in coastal tidal flats, salt marshes, and lagoons. These wading birds utilize salt water areas almost exclusively. Their diet consists of small fish. This wading bird typically inhabits coastal areas. It is unlikely that this bird would inhabit the property.

Snowy Egret

The snowy egret (*Egretta thula*) is a small sized white heron with a black bill, black legs, and yellow feet. Snowy egrets typically eat fish, crabs, amphibians, and insects. Snowy egrets occupy salt marshes, swamps, ponds, shores, tidal flats, rice fields, and shallow coastal bays. Snowy Egrets could potentially utilize the onsite ditches as foraging areas.

Tri-colored Heron

The Tricolored heron (*Egretta tricolor*) is a medium sized heron with a dark slate gray head and upper body with a purplish chest. These herons have a white strip running down the front of their neck that creates their tricolor. Their diets consist of small fish, crustaceans, reptiles, amphibians, insects, snails, and other invertebrates. Tricolored Herons prefer saltwater and brackish water habitats however it forages in both freshwater and saltwater areas. Tricolored Herons can be found in salt and freshwater mudflats, marshes, swamps, and meadows. Tricolored herons could potentially utilize the onsite ditches as foraging areas.

Everglades Mink

The everglades mink (*Mustela vison evergladensis*) is a small mammal with a long slender dark brown body up to 2 feet long, with short legs, and a bushy tail. The mink is slightly similar in appearance to a river otter. The everglades mink occupies shallow freshwater marshes and primarily feeds on crayfish, fish, and small mammals. It is highly unlikely that a mink would be found utilizing the property.

Gopher Tortoise

The gopher tortoise (*Gopherus polyphemus*) is a large reptile that averages 25 cm long and 9 lbs in weight. Wild tortoises can live up to 60 years old. Gopher tortoises dig approximately 4.5 meter long burrows which have a half moon shaped entry and a large apron. Tortoise burrows create homes for 360 species of animals. These tortoises can be commonly found in dry scrub areas, including scrub oak, dry prairies, pine flatwoods, and coastal dune ecosystems. Tortoises are primarily herbivorous; however, they will eat bones of dead animals for calcium. It is highly unlikely that a Gopher Tortoise would be found utilizing the property.

Gopher frog

The gopher frog (*Rana capito*) is a stout bodied cream to brown or black frog with irregular spots on its back and sides. The Florida subspecies (*Rana capito aesopus*) also features a white to cream spotted chin, and a white belly. These frogs are commonly found in moist meadows, prairies, woodlands, and pine scrub areas. The gopher frog utilizes gopher tortoise burrows as a home and is often associated with gopher tortoise burrows. The gopher frog is associated with gopher tortoise and abandoned agricultural areas of the property.

Protected Plants by status

Name	Scientific Name	Habitat	Status	
			FDA	FWS
Beautiful paw-paw	<i>Deeringothamnus pulchellus</i>	411	E	E
Fakahatchee Burmannia	<i>Burmannia flava</i>	411	E	--
Florida coontie	<i>Zamia Floridana</i>	411	C	--
Satinleaf	<i>Chrysophyllum oliviforme</i>	411	E	--
Spiny Hackberry	<i>Celtis pallida</i>	411	E	
Northern Needleleaf	<i>Tillandsia balbisiana</i>	411, 621, 624, 625	T	
Common Wild Pine, Cardianl Airplant, Stiff- Leaved Wild Pine	<i>Tillandsia fasciculata</i>	411, 621, 624, 625	E	
Twisted Air Plant, Banded Air Plant	<i>Tillandsia flexuosa</i>	411, 621, 624, 625	T	--
Fuuzywuzzy Airplant, Hoary Airplant	<i>Tillandsia pruinosa</i>	411, 621, 624, 625	E	
Giant Wild Pine	<i>Tillandsia utriculata</i>	411, 621, 624, 625	E	
Latherleaf Airplant Soft-leaved Wild Pine	<i>Tillandsia caribibias</i>	411, 621, 624, 625	T	

FWS-U.S. Fish and Wildlife Service
 FDA – Florida Department of Agriculture
 USDA – U.S. Department of Agriculture
 T-Threatened
 E-Endangered
 C-Commercially Exploited

Beautiful PawPaw (*Deeringothamnus pulchellus*)

This rare species is found in pine flatwoods with sandy soils. This species has a low potential to occur onsite.

Fakahatchee Burmannia (*Burmannia flava*)

This rare species is typically found in meadows. This species has a low potential to occur onsite.

Florida coontie (*Zamia Floridana*)

This rare species is typically found in high, dry, sandy soils associated with pine flatwoods. This species has a low potential to occur onsite.

Satinleaf (*Chrysophyllum oliviforme*)

This rare species is typically found in high, dry, sandy soils associated with pine flatwoods. This species has a low potential to occur onsite.

Spiny Hackberry (*Celtis pallida*)

This rare species is typically found in high, dry, sandy soils associated with pine flatwoods. This species has a low potential to occur onsite.

Listed Air Plants (*Tillandsia* spp.)

Several of the listed air plants are relatively common, but have recently been listed as a result of a weevil, which poses a potential future threat to its populations. These species may be expected on the site.

D. Impacts on Historic Resources

List all historic resources (including structure, districts, and/or archaeologically sensitive areas) and provide an analysis of the proposed change's impact on these resources. The following should be included with the analysis:

- 1. A map of any historic districts and/or sites, listed on the Florida Master Site File, which are located on the subject property or adjacent properties.**

A cultural assessment has been completed on the site. No cultural resources were identified within the project area during the investigation. Attached are letters of correspondence from the Division of Historical Resources concurring that the proposed development will have no effect on cultural resources. (EXHIBIT IV. D.1)

- 2. A map showing the subject property location on the archaeological sensitivity map for Lee County.**

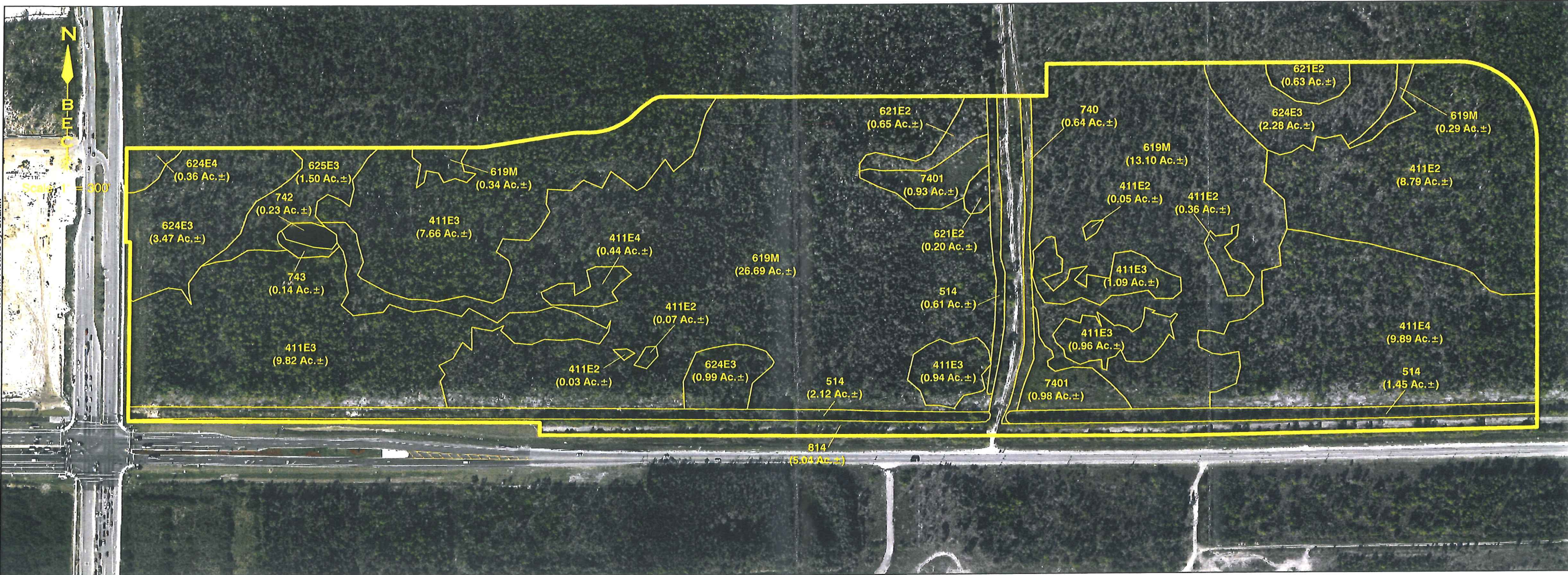
See attached Archaeological Sensitivity Map (EXHIBIT IV.D.2) that shows the property in relationship to the limits of the archaeologically sensitive areas.

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Comp Plan Amendment**

Exhibit IV.C.1

FLUCFCS Map

X:\BEC\2009\2009-45 FL Gulf Coast Tech & Research Park\COMP PLAN AMENDMENT\Com Plan Maps.dwg Tab: FLUCFCS Dec 30, 2009 - 4:45pm Plotted by: brianm



FLUCFCS Legend		
FLUCFCS		
Code	Community	Acres
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624E3	Cypress-Pine-Cabbage Palm, (50-74% Exotics)	6.74 Ac.±
624E4	Cypress-Pine-Cabbage Palm(>75% Exotics)	0.36 Ac.±
625E3	Hydric Pine Flatwoods (50-74% Exotics)	1.50 Ac.±
740	Disturbed Lands	0.64 Ac.±
7401	Disturbed Lands, Hydric	1.91 Ac.±
742	Borrow Areas	0.23 Ac.±
743	Spoil Areas	0.14 Ac.±
814	Road	5.04 Ac.±
TOTAL		102.74 Ac.±

NOTES:

FLUCFCS lines and wetland boundaries and were acquired from Grady Minor, Inc. Drawings: 1480_SP-07-CLR.dwg and 04366-SEP-08-2008-ERP-MASTERLINE-WORK.dwg received on 12-14-09 and 043660121.dwg received 12-15-09. Boylan staff field verified habitat quality and FLUCFCS designations in December 2009.

FLUCFCS per Florida Land Use, Cover and Forms Classification System (FLUCFCS) (FDOT 1999) .

Aerial photographs were acquired through Lee County Property Appraiser's office with a flight date of February, 2005.

Property boundary was acquired from GradyMinor, Inc Drawing No. FGCTRPDRI Comprehensive Plan Boundary-State Plan.DWG



11000 Metro Parkway, Suite 4, Ft. Myers, FL 33966 (239) 418-0671

Drawn By:	Date:	Category
BKM	12/30/09	FLUCFCS
Job Number		Scale:
2009-45		1" = 300'
S/T/R		County
1,2/46S/25E		Lee

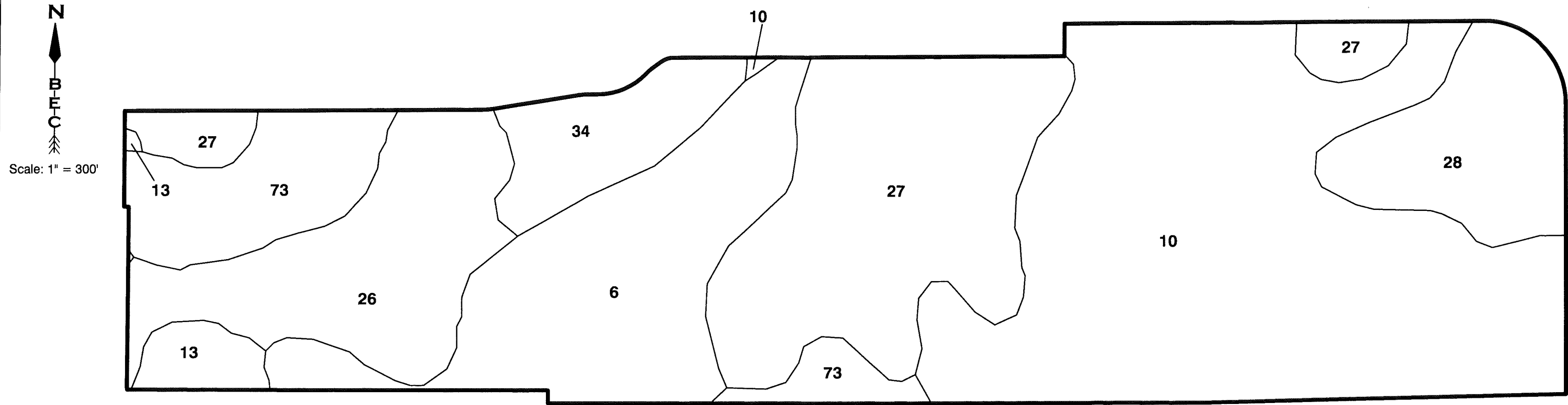
Florida Gulf Coast Technology and Research Park
FLUCFCS Map with Aerial Photograph
Exhibit IV.C.1

Revisions	Date:	Page
		Exhibit

**Florida Gulf Coast Technology and Research Park
Comp Plan Amendment**

**Exhibit IV.C. 2
NRCS Soils Map**

X:\BEC\2009\2009-45 FL Gulf Coast Tech & Research Park\COMP PLAN AMENDMENT\Com Plan Maps.dwg Tab: Soils Dec 30, 2009 - 4:33pm Plotted by: brianm



NRCS Soils Legend		
Soil No	Description	Status
6	Hallandale Fine Sand	Non-Hydric
10	Pompano Fine Sand	Hydric
13	Boca Fine Sand	Non-Hydric
26	Pineda Fine Sand	Hydric
27	Pompano Fine Sand, Depressional	Hydric
28	Immokalee Sand	Non-Hydric
34	Malabar Fine Sand	Hydric
73	Pineda Fine Sand, Depressional	Hydric

NOTES:

Soils were acquired from the FGDL and are from the NRCS Soils Maps.

Property boundary was acquired from GradyMinor, Inc Drawing No. FGCTRPDRI Comprehensive Plan Boundary-State Plan.DWG



11000 Metro Parkway, Suite 4, Ft. Myers, FL 33966 (239) 418-0671

Drawn By:	Date:	Category
BKM	12/30/09	Soils
Job Number		Scale:
2009-45		1" = 300'
S/T/R		County
1,2/46S/25E		Lee

Florida Gulf Coast Technology and Research Park
NRCS Soils Map
Exhibit IV.C.2

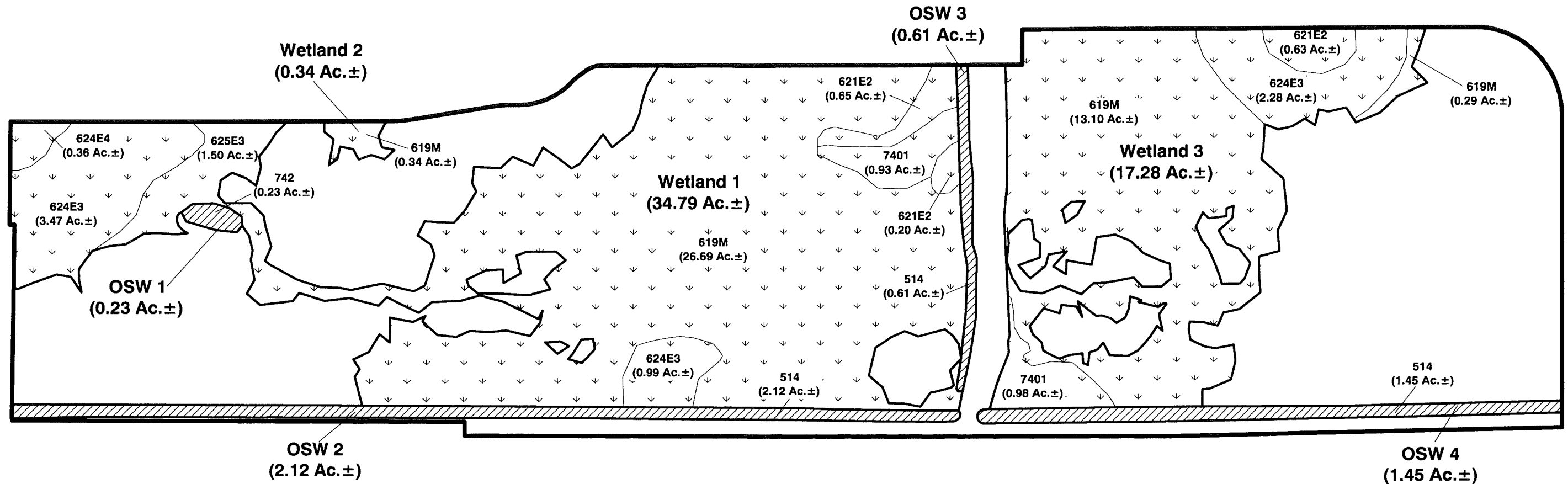
Revisions	Date:	Page
		Exhibit

**Exhibit IV.C.4
Wetland and OSW Map**

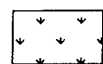
X:\BEC\2009\2009-45 FL Gulf Coast Tech & Research Park\COMP PLAN AMENDMENT\Com Plan Maps.dwg Tab: Wetland Dec 30, 2009 - 4:46pm Plotted by: briann



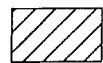
Scale: 1" = 300'



Legend



Wetlands
(52.41 ± Ac.)



Other Surface Waters
(4.41 ± Ac.)

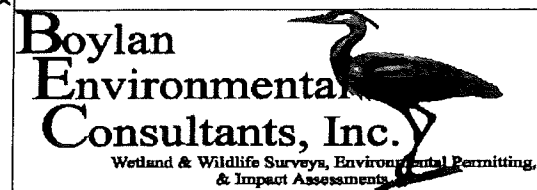
Wetland and OSW By FLUCFCS									
FLUCFCS		Community	Wetland 1	Wetland 2	Wetland 3	OSW 1	OSW 2	OSW 3	Totals
Code									
514	Ditches		-	-	-	2.12± Ac	0.61± Ac	1.45± Ac	4.18± Ac
619M	Exotics Wetland Hardwoods-Melaleuca		26.69 Ac.±	0.34± Ac	13.39± Ac	-	-	-	40.42± Ac
621E2	Cypress, (25-49% Exotics)		0.85 Ac.±	-	0.63± Ac	-	-	-	1.48± Ac
624E3	Cypress-Pine-Cabbage Palm, (50-74% Exotics)		4.46 Ac.±	-	2.28± Ac	-	-	-	6.74± Ac
624E4	Cypress-Pine-Cabbage Palm, (>75% Exotics)		0.36 Ac.±	-	-	-	-	-	0.36± Ac
625E3	Hydric Pine Flatwoods (50-74% Exotics)		1.50 Ac.±	-	-	-	-	-	1.50± Ac
7401	Disturbed Lands, Hydric		0.93 Ac.±	-	0.98 Ac.±	-	-	-	1.91± Ac
Total			34.79± Ac	0.34± Ac	17.28± Ac	2.12± Ac	0.61± Ac	1.45± Ac	56.59± Ac

NOTES:

FLUCFCS lines and wetland boundaries and were acquired from Grady Minor, Inc. Drawings: 1480_SP-07-CLR.dwg and 04366-SEP-08-2008-ERP-MASTERLINE-WORK.dwg received on 12-14-09 and 043660121.dwg received on 12-15-09. Boylan staff field verified habitat quality and FLUCFCS designations in December 2009.

FLUCFCS per Florida Land Use, Cover and Forms Classification System (FLUCFCS) (FDOT 1999).

Property boundary was acquired from Grady Minor, Inc Drawing No. FGCTRPDRI Comprehensive Plan Boundary-State Plan.DWG



11000 Metro Parkway, Suite 4, Ft. Myers, FL 33966 (239) 418-0671

Drawn By:	Date:	Category
BKM	12/30/09	Wetland
Job Number		Scale:
2009-45		1" = 300'
S/T/R		County
1,2/46S/25E		Lee

Florida Gulf Coast Technology and Research Park

Wetland and OSW By FLUCFCS

Exhibit IV.C.4

Revisions	Date:	Page
		Exhibit

Exhibit IV.D.1

Correspondence from the Division of Historical Resources



FLORIDA DEPARTMENT OF STATE
Sue M. Cobb
 Secretary of State
 DIVISION OF HISTORICAL RESOURCES

Mr. Jason Utley
 Southwest Florida Regional Planning Council
 1926 Victoria Avenue
 Fort Myers, Florida 33901-3414

December 7, 2006

RE: DHR Project File No.: 2006-10358
 Received by DHR: November 20, 2006
 Development of Regional Impact – Pre-Application Conference Document
 Florida Gulf Coast Technology & Research Park DRI
 Lee County

Dear Mr. Utley:

Our office received and reviewed the above referenced project in accordance with this agency's responsibilities under Section 380.06, *Florida Statutes*. The State Historic Preservation Officer is to advise in the identification of historic properties (listed or eligible for listing in the *National Register of Historic Places*, or otherwise of historical or architectural significance), assess effects upon them, and consider alternatives to avoid or minimize adverse effects.

A review of our records indicates the proposed project area has been surveyed (*Cultural Resources Assessment Survey of the Florida Gulf Coast Technology and Research Park, Lee County, Florida*). No cultural resources eligible for listing on the NRHP were identified within the project area. Based on the information provided, it is the opinion of this agency that the proposed development is unlikely to affect cultural resources.

For any questions concerning our comments, please contact April Westerman, Historic Preservationist, by electronic mail amwesterman@dos.state.fl.us, or by phone at 850-245-6333 or 800-847-7278. We appreciate your continued interest in protecting Florida's historic properties.

Sincerely,

Frederick P. Gaske, Director, and
 State Historic Preservation Officer

Xc: Sharon Jenkins-Owen, AICP, WilsonMiller, Inc.

500 S. Bronough Street • Tallahassee, FL 32399-0250 • <http://www.flheritage.com>

☐ Director's Office
 (850) 245-6300 • FAX: 245-6435

☐ Archaeological Research
 (850) 245-6444 • FAX: 245-6452

☒ Historic Preservation
 (850) 245-6333 • FAX: 245-6437

☐ Historical Museums
 (850) 245-6400 • FAX: 245-6433

☐ Palm Beach Regional Office
 (561) 279-1475 • FAX: 279-1476

☐ St. Augustine Regional Office
 (904) 825-5045 • FAX: 825-5044

☐ Tampa Regional Office
 (813) 272-3843 • FAX: 272-2340

APPLICATION NUMBER

040130-25#



FLORIDA DEPARTMENT OF STATE
Glenda E. Hood
Secretary of State
DIVISION OF HISTORICAL RESOURCES

ADDL/REVISED SUBMITTAL

FEB 28 2005

FORT MYERS SERVICE CENTER

Ms. Karen M. Johnson
Wilson Miller, Inc.
4571 Colonial Boulevard, Suite 100
Fort Myers, FL 33912-1062

October 18, 2004

Re: DHR Project File No. 2004-9083 (2004-1468)/ Received by DHR: September 23, 2004
*Cultural Resources Assessment Survey of the Florida Gulf Coast Technology and Research Park,
Lee County, Florida*
South Florida Water Management District Application No.: 04013025

Dear Ms. Johnson:

Our office received and reviewed the above referenced survey report in accordance with procedures outlined in Chapters 267 and 373 of the *Florida Statutes*, for possible adverse impact to historic properties listed or eligible for listing in the *National Register of Historic Places (NRHP)*, or otherwise of historical, architectural or archaeological value.

In August 2004, Janus Research conducted an archaeological and historical survey of the Florida Gulf Coast Technology and Research Park project area in Lee County on behalf of Wilson Miller, Inc. No cultural resources were identified within the project area during the investigation.

It is the opinion of Janus Research that the proposed development will have no effect on cultural resources listed or eligible for listing in the *NRHP*, or otherwise of historical, architectural or archaeological value. Janus Research recommends no further investigation of the subject parcel.

Based on the information provided, our office concurs with these determinations and finds the submitted report complete and sufficient in accordance with Chapter 1A-46, *Florida Administrative Code*.

If you have any questions concerning our comments, please contact Ron Grayson, Historic Sites Specialist, by phone at (850) 245-6333, or by electronic mail at rgrayson@dos.state.fl.us. Your continued interest in protecting Florida's historic properties is appreciated.

Sincerely,

Laura R. Kammer
for Frederick Gaske, Director, and
State Historic Preservation Officer

Xc: Rob Robbins - South Florida Water Management District

RECEIVED
OCT 25 2004

Wilson Miller, Inc.
Ft. Myers, FL

500 S. Bronough Street • Tallahassee, FL 32399-0250 • <http://www.flheritage.com>

☐ Director's Office
(850) 245-6300 • FAX: 245-6435

☐ Archaeological Research
(850) 245-6444 • FAX: 245-6436

☒ Historic Preservation
(850) 245-6333 • FAX: 245-6437

☐ Historical Museums
(850) 245-6400 • FAX: 245-6433


☐ Palm Beach Regional Office

☐ St. Augustine Regional Office


Exhibit IV.D.2


Archaeological Sensitivity Map


Legend

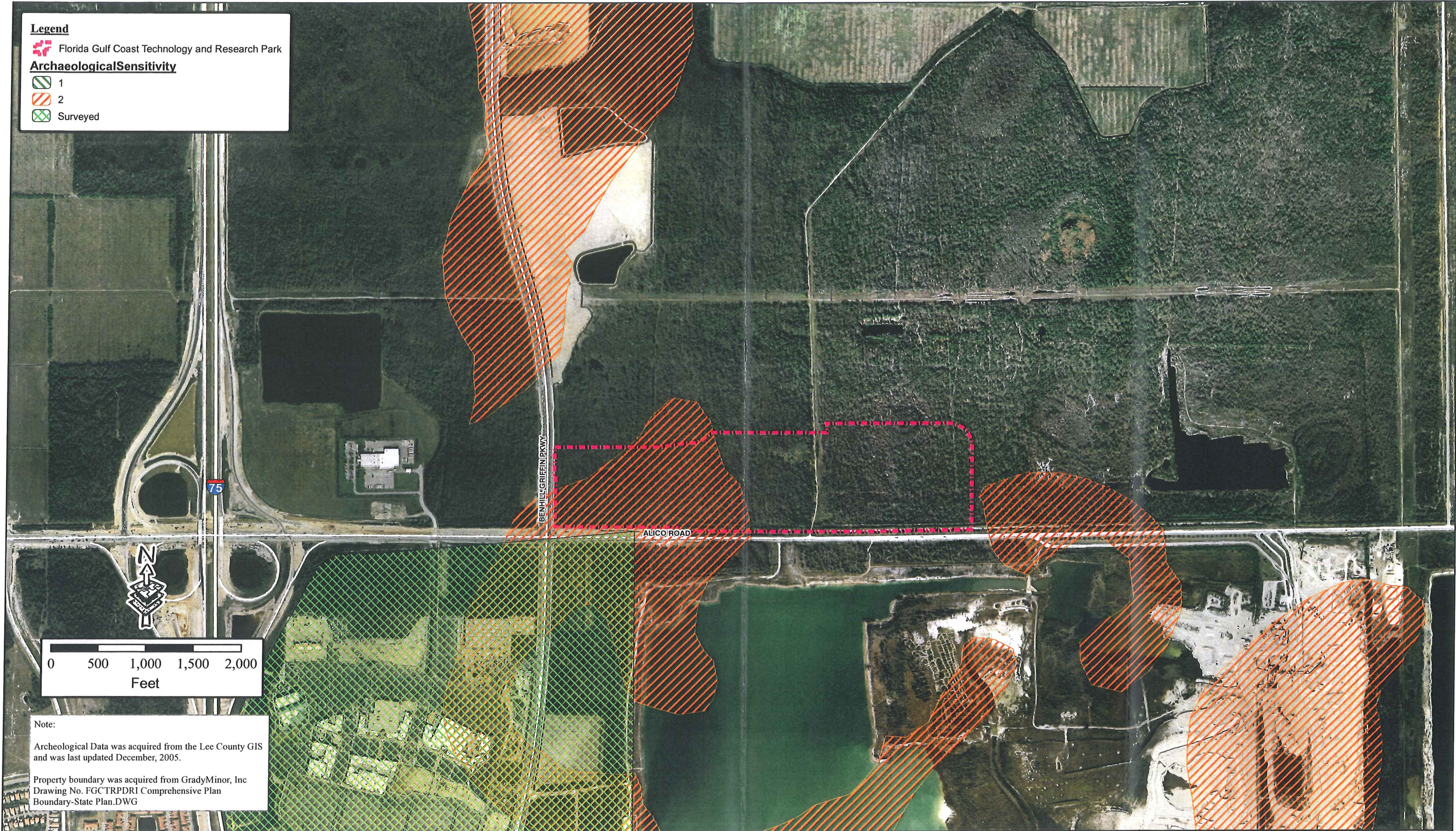
 Florida Gulf Coast Technology and Research Park

Archaeological Sensitivity

 1

 2

 Surveyed



Note:

Archeological Data was acquired from the Lee County GIS and was last updated December, 2005.

Property boundary was acquired from GradyMinor, Inc Drawing No. FGCTRPDRI Comprehensive Plan Boundary-State Plan.DWG

Boylan

Environmental

Consultants, Inc.

Wetland & Wildlife Surveys, Environmental Permitting, & Impact Assessments



11000 METRO PARKWAY,

SUITE 4

FORT MYERS, FL 33966

OFFICE: (239)418-0671

FAX:(239)418-0672

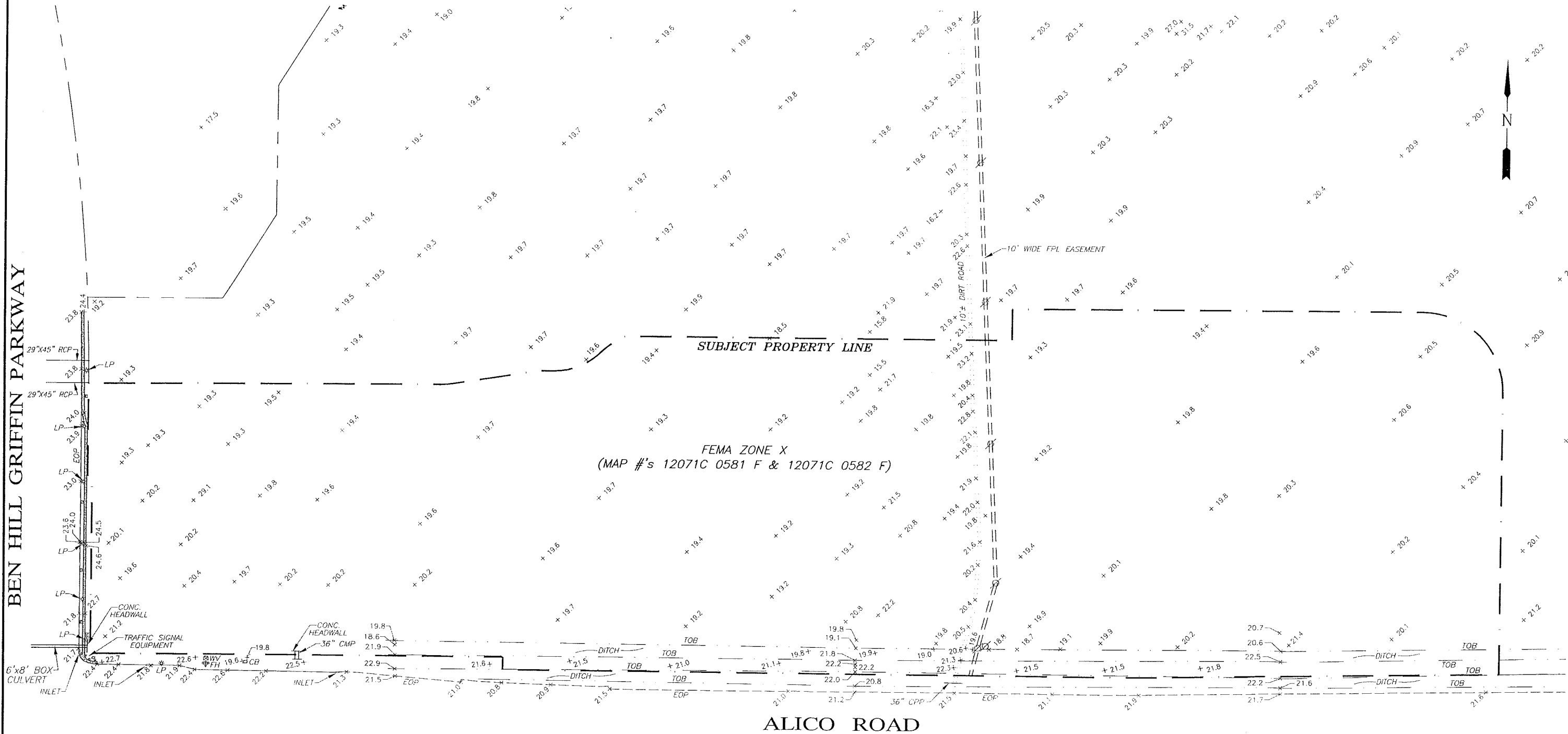
FLORIDA GULF COAST TECHNOLOGY AND RESEARCH PARK

ARCHAEOLOGICAL SENSITIVITY MAP

EXHIBIT IV.D.2

CREATED BY	DATE	CATEGORY	EXHIBIT No.
BKM	12/30/09	ARCHAEOLOGICAL	
PROJECT No.		COUNTY	
2009-45		LEE	
SEC/TWP/RNG \ LOCATION			
1,2/46S/25E			


BEN HILL GRIFFIN PARKWAY



LEGEND	
CONC.	CONCRETE
CMP	CORRUGATED METAL PIPE
CPP	CORRUGATED PLASTIC PIPE
RCP	REINFORCED CONCRETE PIPE
EOP	EDGE OF PAVEMENT
TOB	TOP OF BANK
Ⓢ	DRAINAGE MANHOLE
Ⓢ	ELECTRIC SERVICE/METER
FH	FIRE HYDRANT
LP	LIGHT POLE
Ⓢ	TELEPHONE BOX/RISE
UG	UNDERGROUND
UPD	WOOD UTILITY POLE
WV	WATER VALVE
Ⓢ	CABLE T.V. BOX/RISE
CB	CATCH BASIN/INLET

Revision	Date	Description

DESIGNED BY:	EAJ
DRAWN BY:	ARC
APPROVED:	EAJ
JOB CODE:	FGCTRPDR
SCALE:	1" = 300'

**GradyMinor**

Bonita Springs 239.947.1144
Port Myers 239.690.4380
North Port 941.426.5858
Naples 239.444.2397

Civil Engineers • Land Surveyors • Planners • Landscape Architects

CERT. OF AUTH. EB 0005151 CERT. OF AUTH. LB 0005151 BUSINESS LC 26000266

www.GradyMinor.com Q. Grady Minor and Associates, P.A.

FLORIDA GULF COAST TECHNOLOGY & RESEARCH PARK

**EXHIBIT IV.C.3
TOPOGRAPHIC MAP**

MUNICIPALITY: LEE COUNTY
SEC/TWN/RGE: 1&2/46S/25E
DATE: DECEMBER 2009
FILE NAME: 1&2/46S/25E
COMP PLAN TOPO MAP
SHEET 1 OF 1

OLIVIA A. FOUNTAIN, P.E.
Q. GRADY MINOR & ASSOC., P.A.
11940 FARWAY LAKES DRIVE, SUITE 6
FT. MYERS, FL 33913
FLORIDA P.E. LICENSE NO. 60077
EB/LB 0005151

Exhibit IV.E
Internal Consistency with the Lee Plan

1. The subject plan amendment proposes to add regional and community commercial uses to the corner store commercial land uses. No residential uses are being requested, nor are any residential uses permitted within the area of the plan amendment. The amendment will have no impact on Lee County population projections or the planning community allocation tables.
2. The property is located in the Tradeport and Wetlands Future Land Use Categories. Goals, Objectives and Policies relevant to these land use categories and employment opportunities are analyzed below.

Lee Plan Consistency

The subject property is located in the Gateway/Airport planning community. The vision for this community anticipates that the growth of the airport and Florida Gulf Coast University will energize and provide for expanded commercial and industrial opportunities within this area of the County. The proposed amendment recognizes the synergy of both the S.W. Florida International Airport and Florida Gulf Coast University in providing expanded opportunities for commercial development within this important planning community. The proposed amendment will allow the property in question to meet a broader array of community and regional needs, the additional community and regional commercial development will permit the needs of the growing residential and student population to have their needs met closer to home and the retail will meet the needs of the future employment base along Ben Hill Griffin Parkway and Alico Road. The amendment will allow for a mixture of business, retail and industrial land uses which will not only support the university and airport, but will also serve the large employment and residential base that is anticipated in the immediate and surrounding area.

Objective 1.2 of the Lee Plan relates to the Southwest Florida International Airport and supports the designation of appropriate lands for future use to support the business and industrial development serving the airport for aviation related uses, and non-aviation related uses. The proposed revision to Policy 1.2.2 relating to the Tradeport land use designation, provides for additional non-aviation related commercial development within the area. The proposed revisions to the Tradeport future land use category will provide for additional commercial development to support the large anticipated residential, student, business, employment and visitors serving these economic engines. At the present time, FGCU and the S.W. Florida International Airport employ over 17,000 full-time employees. The approximately 700,000 square feet of retail

development that could be permitted on this property would translate into approximately 1,100 full-time employment opportunities.

Objective 2.2 and its attendant policies support new growth in those areas of Lee County where it can be supported with regard to adequate public facilities and contiguous patterns of growth. The subject property is consistent with this objective. Calculations have been prepared with regard to public facilities including water, sewer, and transportation. Adequate capacity is either in place or will be in place at the time of development. The property is also contiguous to two arterial roadways and is adjacent to other commercial and industrial development. The future development resulting on this property will be compact and efficient.

Goal 11 of the Lee Plan has established minimum review standards for commercial development exceeding 30,000 square feet to insure that water, sewer, traffic and environmental considerations are appropriately reviewed for projects prior to their development order approval. Each development order associated with this property will be reviewed to insure compliance with Goal 11 and the additional development standards found in the LDC to insure adequate public facilities are available to serve the development.

Objective 1.5, Wetlands and the attendant policies promote the limited use and protection of the ecological function of these identified sensitive areas. The proposed Lee Plan amendment does not directly impact the status of any designated wetlands on the property. Prior to any development impacts within the boundary of the subject plan amendment, the ecological function of the wetlands will be analyzed as part of an Environmental Resource Permit (ERP) by the South Florida Water Management District and other reviewing agencies, consistent with **Goal 114** of the Conservation and Coastal Management Element. Consistent with Objective 107.4 of the Lee Plan, a detailed assessment of any threatened or endangered flora and fauna will be prepared prior to any development on the site. In accordance with **Objective 107.2**, the existing native plant communities have been identified on the site and through the Environmental Resource Permit process, and both wetland and upland vegetative communities will be preserved through establishment of recorded conservation easements.

The proposed plan amendment will offer opportunities to expand our community's economic base consistent with **Objective 158.4** of the Economic Element of the Lee Plan. By providing additional necessary uses for large scale developments located in the Tradeport future land use category which permits the expansion of the retail commercial intensities it provides the opportunity for greater economic synergies and diversification.

Exhibit IV.E.4

State Policy and Regional Policy Plans Relevant to Amendment

State Policy Plan

The 103+/- acre Lee Plan amendment is consistent with the State Plan as identified in Chapter 187, F.S. A summary of the consistency with the relevant goals from the Plan is provided below:

Natural Resources

Goal 9 of the State Policy Plan addresses the protection of natural habitats and ecological systems, and restoration of degraded natural systems to a functional condition. The subject property does contain approximately 100 acres of wetlands, of which approximately 100 acres will be preserved and improved by exotic removal and restoration of historic groundwater hydroperiod to restore their ecological function. Impacted lesser quality wetlands will be mitigated in accordance with the approved Environmental Resource Permit. No endangered species have been identified on the subject site.

Land Use

Goal 15 of the State Policy Plan encourages development to be directed to areas which have available land and water resources and services to support the development in an environmentally acceptable manner. The property is located within the urban area of Lee County and the site is serviced by an existing road network and utility system which can accommodate the proposed development, and other growth anticipated in this area of Lee County.

Transportation

Goal 19 of the State Policy Plan discusses transportation coordination efforts with state, local and regional plans. The approval of the proposed Lee Plan amendment will not be inconsistent with approved transportation plans, and prior to commencement of any development on the site, the project will be in accordance with the Lee Plan and Land Development Code.

Economy

The State Plan contains several policies directed at improving the economic climate and providing for job creation opportunities within our communities. The proposed plan amendment will provide for greater community and regional commercial business opportunities in addition to the industrial, office and research related businesses authorized in the Tradeport Future Land Use category. If 100% of the property were developed as retail uses, approximately 1,100 full time jobs would be created.

Strategic Regional Policy Plan

The proposed Lee Plan amendment is consistent with the Southwest Florida Regional Planning Council Regional Policy Plan, adopted June 13, 2002. That Plan contains general goals and policies for insuring that local plans and plan amendments are consistent with five primary issue areas. A summary of the consistency finding for each of the key issue areas is discussed below:

Affordable Housing

One of the strategies of the Regional Plan is to increase the supply of affordable housing to support the employment base in our community. The proposed Lee Plan amendment does not propose residential dwelling units, and is located within the Tradeport Future Land Use category, which prohibits residential development; therefore, no housing units will be built on the subject property. The proposed amendment does anticipate retail commercial development on the site, which use generates demand for housing. The property is included within the pending Florida Gulf Coast Technology and Research Park DRI and an analysis of affordable housing demands has been prepared for that application. Based on the number of employees anticipated to service the retail development, it is anticipated that a demand for approximately 291 dwelling units meeting the guidelines for very low and low income households will result. Based on recent housing sales data, a sufficient supply of affordable housing currently exists in the primary service area.

Economic Development

One of the strategies related to the regional goal of maintaining an adequate infrastructure to support business and industry is to insure an adequate supply of commercial and industrial land and supporting infrastructure. The proposed plan amendment does not eliminate any lands designated as Tradeport under the Lee Plan. The amendment does offer opportunities for additional commercial development within the Tradeport future land use category. In support of the amendment, an economist has prepared a market demand analysis which concludes that additional commercial lands are supportable. The project is within a proposed DRI and employment and revenue projections have been prepared demonstrating the positive economic impacts associated with the project. The property is also located at the intersection of two arterial roadways which serve two of the significant economic engines for Lee County—Southwest Florida International Airport and Florida Gulf Coast University. Access to the site is available from both roadways and the corridor appropriate for support services to commercial and industrial development proposed in this area of Lee County. The addition of commercial development will address the economic strategy of providing for a range of employment opportunities in the region. In addition to office, hotel and industrial employment opportunities, the plan amendment will

permit additional retail commercial job opportunities. The commercial component of the project will equate to over full-time 1,100 jobs for our area. The Economic Element of the Regional Plan also maintains the goal of insuring adequate physical infrastructure to support a diversified economy. The plan amendment application has analyzed available infrastructure to support additional retail commercial development and adequate infrastructure will be in place at the time of development.

Emergency Preparedness

The Strategic Regional Policy Plan emphasizes protection from hurricanes and coastal flooding by encouraging population growth and public expenditures on infrastructure outside the most vulnerable areas subject to storm surge damage. The subject site is located in a category 4/5 storm surge area, which is considered the least vulnerable with respect to potential flood hazards. The subject site is located within a Lee Plan category that does not permit residential development due to the proximity of the site to the S.W. Florida International Airport; therefore, no population is exposed to a greater risk of harm due to hurricane and storm surge issues.

The Policy Plan also addresses the preparation for responding to potential hazardous material spills. While the proposed plan amendment does not contemplate a specific land use which will be a generator of hazardous materials; the Tradeport future land use designation does permit a wide range of light industrial, research and industrial land uses. Any future land use which does generate or store any hazardous material will comply with local and state standards for properly handling these materials, consistent with the goals and strategies of the Policy Plan.

Natural Resources

No regionally significant natural resources are present on the subject property, nor are any of portions of the property identified for future public acquisition. The property does have an Environmental Resource Permit, which has analyzed the potential impact to surface waters and stormwater runoff. The existing permit insures consistency with Goal 3 of the Regional Plan, which addresses consistency in modeling to address potential impacts to our resources.

Through the ERP process, portions of the site have been identified for on-site preservation and enhancement to protect potential habitat for wading birds and other listed species found in our region. The protection of this habitat is consistent with the Regional strategy of promoting design principles which will protect habitats. The ERP and U.S. Army Corps of Engineers permits will require on-site preservation as well as potential off-site mitigation. The on-site preservation areas are connected to off-site preservation areas. Any off-site

mitigation will provide for the preservation or enhancement of other lands deemed to provide for better overall resource protection for our region.

Regional Transportation

An analysis of the potential impact of developing approximately 103 acres for retail commercial land uses has been analyzed utilizing methodologies approved by Lee County and the RPC. The analysis demonstrates that no significant impacts to the surrounding road network result from this proposed plan amendment. The proposed Lee Plan amendment will not be inconsistent with the regional strategy of assessing impacts to our transportation system to insure that level of service standards are maintained. The development resulting from the proposed Lee Plan amendment will not result in roadway levels of service below those adopted for the Lee County roadways serving the development. Due to the proximity of the property to the Southwest Florida Regional Airport and Florida Gulf Coast University, the site is served by an existing roadway corridor designed to provide a route for both freight and visitors to our region. The property is located along an existing Lee Tran bus route, which promotes the regional strategy of providing multi-modal opportunities for accessibility in the region.

Exhibit IV.F.1
Additional Requirements for Specific Future Land Use Amendments

- 1.a. The subject Lee Plan Amendment proposes revisions to the Tradeport future land use category, and establishes criteria under which community and regional commercial development may occur, in addition to the ancillary commercial currently provided for in Policy 1.2.2. The proposed Lee Plan amendment is filed concurrently with the pending Florida Gulf Coast Technology and Research Park DRI application.

The subject property is located at the intersection of Ben Hill Griffin Parkway and Allico Road. Ben Hill Griffin is designated as an arterial roadway by Lee County and Allico Road is designated as an arterial roadway west of Ben Hill Griffin Parkway and a collector roadway east of Ben Hill Griffin Parkway. The DRI proposes access to both Ben Hill Griffin and Allico Road.

Rail service is not immediately available to the site. The site is adjacent to the Southwest Florida International Airport; however, the adopted airport master plan does not contemplate vehicular access to the subject property.

- 1.b. The proposed Lee Plan text amendment to the Tradeport future land use category proposes additional retail commercial opportunities, which will be evaluated as part of the DRI review for the Florida Gulf Coast Technology and Research Park DRI. No lands are proposed to be removed from the Tradeport land use category.
- 1.c. Policy 7.1.4 of the Lee Plan discusses the requirement to monitor the amount of land converted to industrial use and adjust the Lee Plan allocation tables accordingly. Due in large part to the successful expansion of the Southwest Florida International Airport and growth of the Florida Gulf Coast University, a large number of projects within the Tradeport future land use category have been approved or are under review. The Tradeport future land use category applies to lands in the immediate vicinity of the Southwest Florida International Airport, served by the Ben Hill Griffin/Treeline Avenue roadways.

To date, Lee County has approved over 5.5 million square feet of land uses consistent with the industrial, warehousing, research and development, office, hotel, and retail development authorized in the Tradeport land use category. Projects such as the Airport Autopark, Airport Technology Center, Arlington Commerce Park, Premier Airport Park, and Airport Interstate Commerce Park have received zoning approval by Lee County, and all are along the Ben Hill Griffin/Treeline Ave. corridor. The proposed Florida Gulf Coast Technology and Research Park DRI alone proposes over 3.8 million square feet of industrial development, 400,000 square feet of office uses, 240 hotel rooms and 700,000 square feet of retail commercial development.

Each of the approved developments in the Tradeport land use category will create a variety of job opportunities, furthering the County's goal of diversifying job opportunities in our region. Based on the employment analysis accompanying the DRI application, the Florida Gulf Coast Technology and Research Park DRI will create jobs for over 7,000 Lee County residents at buildout.

In addition to the employees directly associated with this DRI, the immediate area is presently a large employment nucleus due to the Southwest Florida International Airport and Florida Gulf Coast University. According to data published by the Lee County Port Authority, the airport provides jobs for over 2,500 employees. Florida Gulf Coast University data indicates that in 2008, the University provided 953 full time jobs. One would anticipate, based on the historic growth rate that the airport and the university will continue to be significant job generators. Both of these employment centers provide additional economic benefits to the immediate area, and the number of employees is one measure by which we can gage the benefits. Both FGCU and Southwest Florida International Airport also bring thousands more people into the immediate area on a daily basis as shown by the associated airport passenger and student enrollment data.

For example, in 2008, Southwest Florida International Airport had over 7.6 million passengers. This passenger data placed the airport in the top 50 airports in the Country for passenger service. With regard to Florida Gulf Coast University, student enrollment has steadily increased. Tables 1.1 and 1.2 demonstrate the student enrollment rates since the University's inaugural class in 1997. FGCU enrollment has grown from 2,500 students in 1997 to over 10,000 students in 2008.

The Tradeport future land use category is described in Policy 1.2.2. The policy as presently written provides for a wide variety of industrial, warehousing, office, research and activities related to the airport. Retail commercial is permitted as an ancillary use to the other permitted uses. When all of the surrounding public, educational, industrial, business, and residential uses are evaluated, there is an unmet demand for retail that serves more than just the airport and the industrial uses. In order to more comprehensively address the regional demand of the area the proposed Lee Plan amendment will provide for non-ancillary retail commercial development, conditional upon meeting several significant criteria designed to ensure the retail serves the demand of the larger context area.

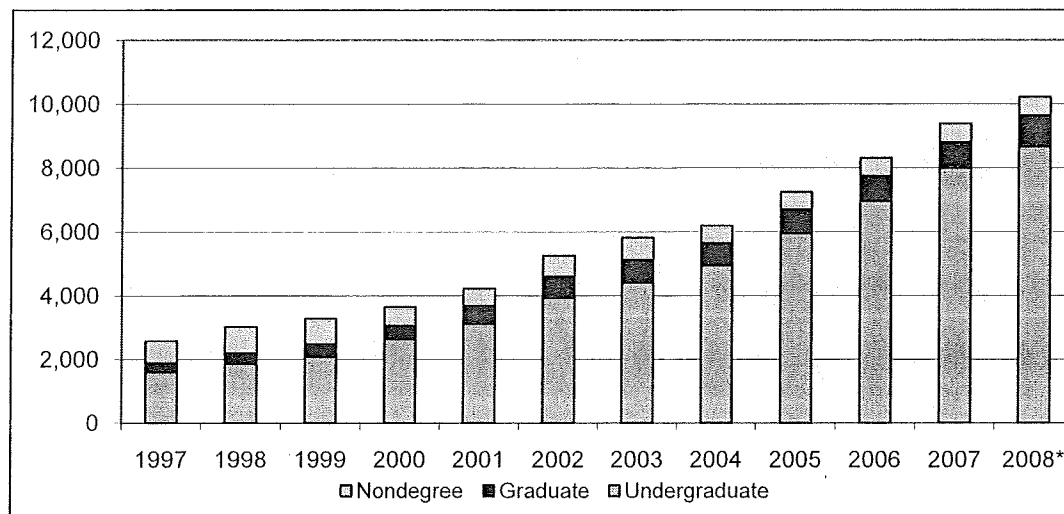
The applicant believes that there is an unmet demand for community and regional commercial development within the Tradeport land use category and the immediately adjacent University Community, due to the employment, airport passenger, and student enrollment figures discussed

above. Although residential development is not permitted in the Tradeport land use category, the high concentration of employees and students in Tradeport and the University Community provide a demand for retail services above those associated with corner-store commercial, which is limited to 5,000 square feet per building.

The Florida Gulf Coast Town Center is proximate to the subject site. While the 1.4 million square feet of commercial development authorized is significant, one retail center may not be able to fulfill all of the retail demand for this growing area of the County. Many retailers and retail services are not traditionally located in a regional mall setting, and alternative commercial locations will permit a broader range of retail tenant opportunities to serve the growing employment, visitor and student population in this area of the County. The synergy created by the airport, FGCU, growing industrial and technology employment, and the regional mall, create a demand for a wide range of retail goods and services, that cannot be measured in the more conventional methods which are based largely on occupied household data. The Tradeport future land use category has created a concentrated demand for services that cannot be met by one major retail center or through a series of corner-store convenience commercial uses.

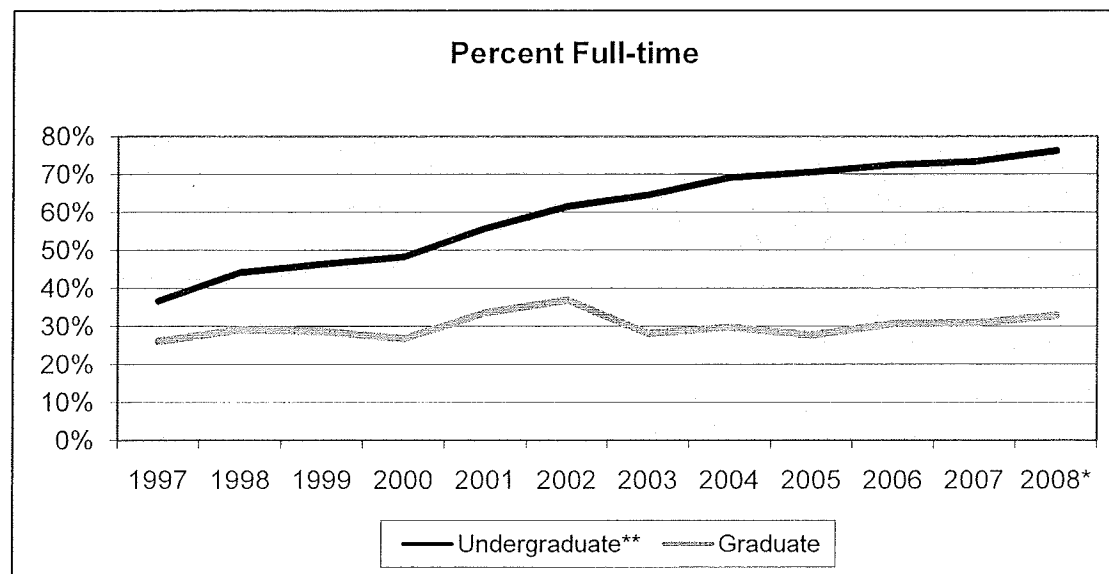
Additional retail commercial opportunities are logical near the intersection of Alico Road and Ben Hill Griffin Parkway. The infrastructure is planned to meet the growth of the airport and FGCU, along with the anticipated growth for industrial, warehousing and research oriented users that will choose to locate in this region of Lee County.

Table 1.1 - Headcount Enrolled by Class, Fall Terms



Fall Term	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008*
Undergraduate	1,602	1,854	2,074	2,625	3,112	3,926	4,398	4,946	5,952	6,962	7,986	8,663
Graduate	295	344	407	441	580	686	733	706	760	795	822	985
Nondegree	687	830	803	587	543	646	694	546	542	559	580	573
Total	2,584	3,028	3,284	3,653	4,235	5,258	5,825	6,198	7,254	8,316	9,388	10,221

Table 1.2 - Full-time Attendance by Level, Fall Terms



Undergraduate**	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008*
Full-time	838	1,184	1,331	1,547	2,036	2,811	3,287	3,794	4,580	5,450	6,278	7,032
Part-time	1,451	1,500	1,545	1,665	1,619	1,761	1,805	1,698	1,914	2,071	2,288	2,204
% Full-time	37%	44%	46%	48%	56%	61%	65%	69%	71%	72%	73%	76%
Graduate	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008*
Full-time	77	100	117	118	195	253	206	210	210	244	253	323
Part-time	218	244	291	323	385	433	527	496	550	551	569	662
% Full-time	26%	29%	29%	27%	34%	37%	28%	30%	28%	31%	31%	33%

*Preliminary data.

**Undergraduate includes Non-degree seeking students

Graduate students are considered full-time if they attempt 9

Source: BOG Student Data Course Files.