

RSW CPA2010-00008 Exhibit

Legend



Approved Non-Aviation Parcels - Z-06-030



Current Indigenous Open Space - Z-06-030



Potential Non-Aviation Parcels - 170 acres



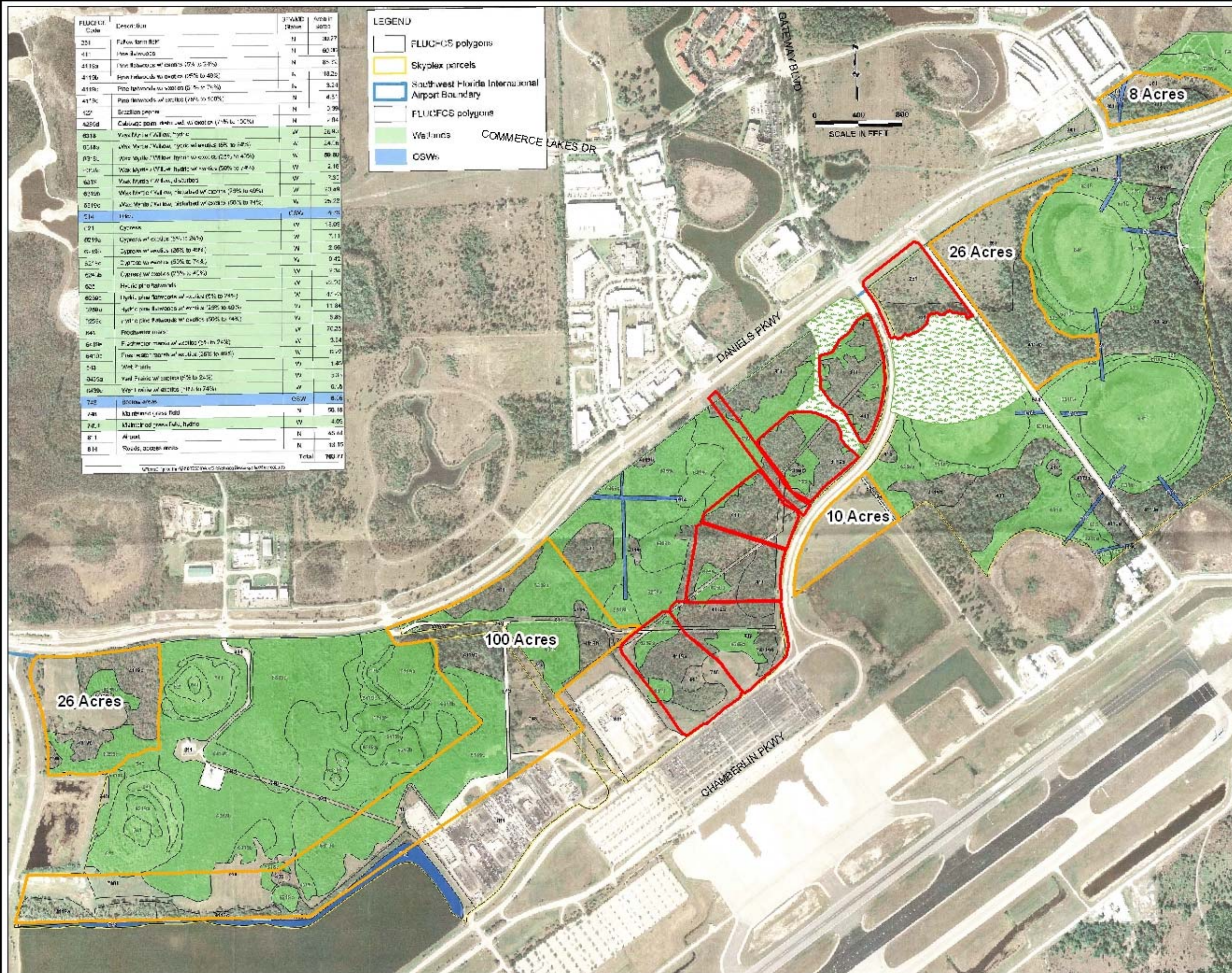
MAP CREATION DATE: May 6, 2011

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AERIAL PHOTOGRAPHY
January 2010



1,100 550 0 1,100
Feet



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

Date: May 10, 2011

To: Brandon Dunn, Senior Planner

From: Aaron Martin, Environmental Planner
Phone: 239-533-8522
E-mail: amartin@leegov.com



Project: RSW

Case: CPA2010-00008

The applicant is requesting to amend Lee Plan Policy 1.2.7 and 47.3.4 of the Future Land Use Element and Table 5(a) Southwest Florida International Airport Development Schedule to modify the development parameters allowed within the future non-aviation areas and allow for additional non-aviation acreage and square footage. The Division of Environmental Sciences (ES) Staff has reviewed the proposed amendment and offers the following analysis and recommendation to transmit the amendment request.

PROPOSED POLICY LANGUAGE CHANGE

The applicant is proposing to add the following revision (strikethrough and underlined):

Policy 1.2.7: Future non-aviation areas depicted on the Airport Layout Plan (Map 3F) will be developed, to the greatest extent possible, only within existing upland areas. Impacts to wetlands in the future non-aviation areas will be minimized by site design, whenever possible, in compliance with the Lee County Land Development Code. ~~Development within the future non-aviation area, as designated on Map 3F, is limited to a total of 100 acres.~~ Development within the non-aviation areas, as shown on Map 3F, is limited to a maximum of 300 acres north of runway 6-24 and 51.66 acres within the midfield terminal area. All non-aviation development must be in compliance with Map 3F and the intensities outlined in Table 5(a). Development of additional acreage will require prior Lee Plan amendment approval.

Policy 47.3.4: The proposed development schedule for the Southwest Florida International Airport through the year 2020 for landside and airside uses and through the year 2030 for non aviation uses is depicted in table 5(a) of the Lee Plan. The proposed development schedule for the Page Field General Aviation Airport through the year 2025 is depicted in table 5(b) of the Lee Plan. These tables include both aviation and non aviation related development. If the FAA/FDOT mandate navigational improvements (NAVAIDS) or require improvements related to Airport security or safety at Southwest Florida International Airport of Page Field General Aviation Airport, then the Port Authority may pursue installation of the improvement even though the improvement is not specifically identified on Table 5(a) or Table 5(b). However, the

Table 5(a):

ENVIRONMENTAL CONCERNS:

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application be treated in the same manner and these items be reviewed when a zoning amendment is submitted to allow for the proposed square footage changes and increased acreage of the non-aviation areas. At time of zoning the following will be reviewed along with other items such as buffering and lake littoral plantings:

Indigenous Open Space: When the original 100 acre non-aviation area was designated in Z-06-030 preserve tracts were set aside to meet the requirements of LDC 10-415 for indigenous open space. During the future zoning amendment to add the additional 200 acres the applicant will be required to address indigenous open space which would equate to be a minimum of 30 acres. Note that this 30 acres will actually be included in the total 200 acre non-aviation area resulting in 170 acres of non aviation developable area and 30 acres of indigenous open space. This is similar to what was done during the previous 100 acre designation.

This is consistent with the following Lee Plan Goals, Objectives, and Policies:

Objective 77.2: Development regulations will continue to require that new commercial and industrial developments provide sufficient open space for the benefit of their patrons and the general public.

Objective 77.3: New developments must use innovative open space design to preserve existing native vegetation, provide visual relief, and buffer adjacent uses and proposed/existing right-of-ways. This objective and subsequent policies are to be implemented through the zoning process.

Policy 77.3.1: Any new development with existing indigenous vegetation is encouraged to provide half of the required open space as existing native plant communities. Any new development with existing native trees without associated native groundcover or understory is encouraged to provide half of the required open space with areas containing existing native trees. The planting of native shrubs species within native tree protection areas is encouraged.

Policy 77.3.2: Open space areas must be designed with adequate widths to preserve and allow the continued growth and viability of existing native trees.

Wetland Protection: Per Lee Plan Policy 1.2.7 future non-aviation development will be focused within upland areas while minimizing impacts to wetlands. The provided Florida Land Use Land Covers Classification System (FLUCCS) map prepared by Johnson Engineering demonstrates the area north of runway 6-24, designated as non-aviation use, contains approximately 315.16 acres of uplands and 377.08 acres of wetlands. The wetlands are a mixture of hydric myrtle/willow, hydric pine, and cypress. These vary in quality from 0%-75% invasion by exotic species. During the zoning process development tract locations will be evaluated based upon the presence of uplands and wetlands and tracts will be concentrated into the upland areas and within lower quality wetlands. This was done during Z-06-030 for the original 100 acres. As an exercise to demonstrate that the additional 200 acres (or 170 acres of developable area) could be provided on the site

without significant wetland impacts ES Staff prepared a map showing potential development areas (see attached Exhibit). This attached map focuses development within upland areas and does allow for some impacts to fringe and isolated higher exotic infested wetlands, while maintaining preserves along major portions of Daniels Pkwy and adjacent to weir structures to maintain positive flow through the area and future use of these wetlands as natural storm water treatment areas.

This is consistent with the following Lee Plan Goals, Objectives, and Policies:

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

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

Objective 61.2: 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.

Goal 114: To maintain and enforce a regulatory program for development in wetlands that is cost effective, complements federal and state permitting processes, and protects the fragile ecological characteristics of wetland systems.

Objective 114.1: The natural functions of wetland 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 Florida Statute (F.S.) 373.019(17) through the use of the unified state delineation methodology described in Florida Administrative Code (FAC) Chapter 17-340, as ratified and amended by F.S. 373.4211.

Protected Species: Per the Environmental assessment performed by Johnson Engineering the site has the potential to contain multiple protected species. These include: American alligator, Eastern indigo snake, Gopher frog, Gopher tortoise, Roseate spoonbill, Limpkin, Little blue heron, Reddish egret, Snowy egret, Tricolored heron, Peregrine falcon, Southeastern American kestrel, Florida sandhill crane, Wood stork, Red-cockaded woodpecker, Audobon's crested caracara, Snail kite, Florida panther, Big cypress fox squirrel, Florida black bear, Everglades mink, Satinleaf, Beautiful pawpaw, Fakahatchee burmannia, and Coontie. Additionally, the northeast portion of the future non-aviation use area is located within the panther primary zone and the property is within the wood stork core foraging area. During the zoning process the applicant will be responsible for providing a protected species survey. If species are found specific zoning conditions, management plans, and any state and federal permits will be required. In addition, the avoidance of high quality wetlands on the site per the attached exhibit will allow for minimal impacts to protected species.

This is consistent with the following Lee Plan Goals, Objectives, and Policies:

Objective 107.4: Lee County will continue to protect habitats of endangered and threatened species and species of special concern in order to maintain or enhance existing population numbers and distributions of listed species.

Policy 107.4.2: Conserve critical habitat of rare and endangered plant and animal species through development review, regulation, incentives, and acquisition.

Policy 107.4.3: Require detailed inventories and assessments of the impacts of development where it threatens habitat of endangered and threatened species and species of special concern.

Policy 107.4.4: Restrict the use of protected plant and wildlife species habitat to that which is compatible with the requirements of endangered and threatened species and species of special concern. New developments must protect remnants of viable habitats when listed vegetative and wildlife species inhabit a tract slated for development, except where equivalent mitigation is provided.

Policy 107.8.1: The County's policy is to protect gopher tortoise burrows wherever they are found. However, if unavoidable conflicts make on-site protection infeasible, then off-site mitigation may be provided in accordance with FWC requirements.

Objective 107.10: Lee County will maintain regulatory measures to protect the wood stork's feeding and roosting areas and habitat.

Policy 107.10.2: The County will continue to require management plans for existing wood stork feeding, roosting, and rooking areas to utilize "Habitat Management Guidelines for the Wood Stork in the Southeast Region" (U.S. Fish and Wildlife Service, 1990).

CONCLUSION:

The proposed amendment to the RSW airport allowing for increased non-aviation acreage and increased square footages can be accomplished while avoiding impacts to high quality wetlands meeting the requirements of Lee Plan Policy 1.2.7 and other Lee Plan Goals, Objectives, and Policies as described above. At time of zoning ES Staff will work with the applicant to designate development areas focusing on wetland protection, preserving surface water flows, indigenous preservation, and protecting species habitat similar to the attached map. Therefore, ES Staff is recommending approval and transmittal of CPA2010-00008.

RSW CPA2010-00008
Exhibit

Legend



Approved Non-Aviation Parcels - Z-06-030



Current Indigenous Open Space - Z-06-030



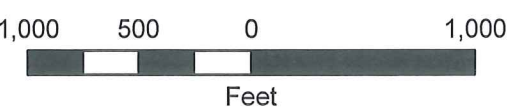
Potential Non-Aviation Parcels (CPA2010-00008) - 170 acres



MAP CREATION DATE: May 10, 2011
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AERIAL PHOTOGRAPHY
January 2010

N



FLUCFCS Code	Description	SFWMD Status	Area in acres
261	Fallow farm field	N	30.77
411	Pine flatwoods	N	60.30
4119a	Pine flatwoods w/ exotics (0% to 24%)	N	85.72
4119b	Pine flatwoods w/ exotics (25% to 49%)	N	10.26
4119c	Pine flatwoods w/ exotics (50% to 74%)	N	3.24
4119d	Pine flatwoods w/ exotics (75% to 100%)	N	4.81
422	Brazilian pepper	N	0.39
4220d	Cabbage palm, disturbed, w/ exotics (75% to 100%)	N	2.64
6318	Wax Myrtle / Willow, hydric	W	26.90
6318a	Wax Myrtle / Willow, hydric w/ exotics (0% to 24%)	W	24.96
6318b	Wax Myrtle / Willow, hydric w/ exotics (25% to 49%)	W	59.00
6318c	Wax Myrtle / Willow, hydric w/ exotics (50% to 74%)	W	2.16
6319	Wax Myrtle / Willow, disturbed	W	7.30
6319b	Wax Myrtle / Willow, disturbed w/ exotics (25% to 49%)	W	23.49
6319c	Wax Myrtle / Willow, disturbed w/ exotics (50% to 74%)	W	29.22
614	Ditch	OSW	4.76
621	Cypress	W	13.06
6210a	Cypress w/ exotics (0% to 24%)	W	7.11
6219a	Cypress w/ exotics (25% to 49%)	W	2.95
6219b	Cypress w/ exotics (50% to 74%)	W	0.42
6219c	Cypress w/ exotics (75% to 100%)	W	2.34
629	Hydric pine flatwoods	W	22.03
6290a	Hydric pine flatwoods w/ exotics (0% to 24%)	W	17.23
6290b	Hydric pine flatwoods w/ exotics (25% to 49%)	W	11.04
6290c	Hydric pine flatwoods w/ exotics (50% to 74%)	W	6.85
641	Freshwater marsh	W	70.29
6410a	Freshwater marsh w/ exotics (0% to 24%)	W	3.54
6410b	Freshwater marsh w/ exotics (25% to 49%)	W	6.22
641	Wet Prairie	W	1.45
6430a	Wet Prairie w/ exotics (0% to 24%)	W	3.33
6430b	Wet Prairie w/ exotics (25% to 49%)	W	0.16
742	Borrow areas	OSW	0.69
743	Maintained grass field	N	56.18
7431	Maintained grass field, hydric	N	4.03
811	Airport	N	45.44
814	Roads, access areas	N	13.15
Total			703.77


LEGEND

- FLUCFCS polygons
- Skyplex parcels
- Southwest Florida International Airport Boundary
- FLUCFCS polygons
- Wetlands
- OSWs



Memo

To: Paul O'Connor, Planning Director

From: David Loveland, Public Works Operations Manager, Planning 

Date: May 10, 2011

Subject: **CPA 2010-08 (RSW Comprehensive Plan Amendment)**

The Department of Transportation has reviewed the above-referenced comprehensive plan amendment request, submitted on behalf of the Lee County Port Authority. The request is to amend Policy 1.2.7 and Policy 47.3.4 of the Future Land Use and Transportation Elements and to amend Table 5(a) SWFIA Development Schedule to allow additional development within future non-aviation areas of the Southwest Florida International Airport. The applicant's traffic analysis indicates that the non-aviation land uses would total 248,750 square feet of retail and service, 5,000 square feet of gas station/convenience store, 187 hotel rooms, 147,500 square feet of light manufacturing/assembly, 329,200 square feet of warehouse/distribution, and 162,500 square feet of office at buildout.

The applicant did not submit a short-range analysis, noting there are no immediate development plans at this time. Instead the applicant submitted an analysis based on the above development parameters plugged into the Lee MPO 2030 Financially Feasible Plan FSUTMS model set. Their conclusion was that a large section of Daniels Parkway and some sections of I-75 and Treeline Avenue are projected to fail (i.e., volume-to-capacity ratio exceeds 1.0) in 2030 even without the additional development from this plan amendment request. The segments projected to fail are:

Daniels Parkway, Palomino Lane to SR 82 (at 6 lanes)
I-75, Terminal Access Road to Colonial Boulevard (at 6 lanes)
Treeline Avenue, Terminal Access Road to Daniels Parkway (at 6 lanes)

Applicant's Analysis

In the initial amendment request submittal, the applicant stated the following in relation to addressing the transportation impacts:

"All non-aviation development will be subject to Lee County guidelines to meet concurrency requirements. This traffic study will provide guidelines for the congested roadway segments. However, when the proposed developments will need to be implemented, site specific traffic studies will be required for concurrency compliance to identify relevant impact fees at that time. The Lee County Port Authority will work closely with Lee County Transportation Planning,

FDOT and other stakeholders to ensure that sufficient capacity is made available along the arterial roadway segments in the study area.”

In addition, the applicant provided the following supplemental statements as part of a sufficiency response:

- “1. As a multimodal facility, Southwest Florida International Airport serves the traveling public’s needs by offering air travel alternatives for more efficient, longer distance travel. As a vital part of the national aviation system this local transportation resource provides a critical global economic link for tourism, business and personal travel requirements. In addition, the Airport is a key component of Florida’s Strategic Intermodal System wherein the state recognizes the value of providing and maintaining quality access and mobility to support the region and State’s competitive connection with the global economy. A 2010 Florida Statewide Aviation Economic Impact Study by the Florida Department of Transportation determined the total contribution from airport operations to the region’s economy through direct and indirect sources is \$3.8 billion annually.
2. While the Port Authority must observe FAA restrictions on investment in capital projects outside the Airport boundary, the Port Authority has been supportive and contributed toward permitting and mitigation associated with the completed extension of Treeline Avenue and the planned development of a new I-75 direct airport connector interchange. These improvements relieve congestion on Daniels Parkway and the Daniels Parkway and Alico Road Interchanges.
3. The planned future eastern extension of Alico Road, and eventual connection of the Alico Extension to SR 82 will provide an alternate route from Lehigh Acres to I-75 and all points south and west, and therefore relieve current and projected congestion on Daniels Parkway.
4. Public transit provides alternative means of transportation to help reduce private vehicle trips to the Airport. Lee Tran Route 50 connects travelers and employees from as far west as the Tanger Outlet Center on McGregor Boulevard to the Airport. Future expansion of LeeTran operations with services to Southwest Florida International Airport, the Red Sox Spring Training Facility, Florida Gulf Coast University and the surrounding business parks will further improve connectivity and relieve congestion on the regional roadway network.”

Finally, in response to discussions with staff about multi-modal accommodations, the applicant noted that the existing Airport Layout Plan already identifies an area of airport property along Treeline Avenue as the potential location for a multi-modal facility, and was willing to consider possible relocation of that area up along Daniels Parkway as part of future updates of the Airport Layout Plan. The applicant offered the following additional Lee Plan text change to address the issue:

POLICY 47.2.1: The Port Authority will coordinate efforts with aviation and other transportation interests at Southwest Florida International Airport to establish multi-modal

transfer facilities. As such, during prior master planning efforts, the Port Authority has identified on its Airport Layout Plan (Map 3F) a passenger multi-modal facility within its ultimate planning horizon. As part of the normal Airport Master Plan approval process, the Airport Layout Plan has been approved by the FAA, FDOT, and the Board of County Commissioners and is consistent with other transportation-related objectives. This ALP (Map 3F) and the RSW Proposed Development Schedule (Table 5a) was previously adopted into the Comprehensive Plan through CPA 2003-02. Future RSW Master Plan Update efforts will continue to re-evaluate suitable locations for a multi-modal transfer facility on airport property.

DOT Staff Conclusions

While the projected roadway failures in 2030 both with and without the CPA would normally be a cause for concern and could lead to a recommendation of non-transmittal absent a financial commitment to make the necessary improvements, DOT staff recognizes that the Port Authority is not like a regular developer and that the Southwest Florida International Airport is in fact a key part of the area's transportation infrastructure. By its very existence it helps take some trips off the roadways in terms of arriving visitors and goods. We also recognize that the development of the non-aviation areas is intended to generate revenue for the continued successful operation of the Airport into the future, and that under Policy 47.4.5 of the Lee Plan, "development of non-aviation related uses on airport property will be required to meet concurrency standards set forth in the Lee County Land Development Code." Furthermore, we are familiar with the FAA rules that make it difficult for the Port Authority to commit to off-site road improvements and we acknowledge the Port Authority's previous actions to construct a key section of Treeline Avenue. We agree that the new Airport Connector project providing a direct connection to I-75, which is scheduled for construction by FDOT in FY 11/12, will provide relief in the short term to Daniels Parkway and its interchange with I-75, and we agree that the planned Alico Road Extension, which was not part of the 2030 Financially Feasible Plan network but is part of the new MPO 2035 Financially Feasible Plan, will provide significant future relief to Daniels Parkway.

It is important to recognize that the development on and around the airport property is a key element of the County's "Research Diamond" concept, promoting airport-related and alternative energy research and development types of development in the area, while at the same time focusing on a "green" approach to infrastructure. Therefore, accommodating alternative modes of transportation is a key consideration, and will help address the projected future roadway level of service conditions. Lee County DOT staff supports the suggestion of the Lee County Planning staff to limit the footprint of the non-aviation development north of the old terminal, which Planning staff is proposing to protect wetlands but which should also have the effect of clustering the planned development, thereby making it more walkable and more transit-oriented. It is worth noting that the MPO's new 2035 Plan calls for a possible park-and-ride facility in the area, which should be a consideration as more specific development plans for the site are established. We also appreciate the Port Authority's willingness to reconsider the most appropriate location within their property for a multi-modal facility as part of future updates of the Airport Layout Plan, but their proposed change to Policy 47.2.1 could be streamlined. Planning staff has suggested a simplification of the proposal, which DOT staff supports, which would read:

POLICY 47.2.1: The Port Authority will coordinate efforts with aviation and other transportation interests at Southwest Florida International Airport to establish multi-modal transfer facilities. ~~As such, during prior master planning efforts, t~~The Port Authority has identified on its Airport Layout Plan (Map 3F) a passenger multi-modal facility within its ultimate planning horizon. As part of the normal Airport Master Plan update and approval process, the Airport Layout Plan has been was approved by the FAA, FDOT, and the Board of County Commissioners and is consistent with other transportation-related objectives. ~~This ALP (Map 3F) and the RSW Proposed Development Schedule (Table 5a) was previously adopted into the Comprehensive Plan through CPA 2003-02. Future RSW Southwest Florida International Airport Master Plan Update efforts will continue to re-evaluate suitable appropriate locations for a multi-modal transfer facilityies on airport property.~~

Based on the above reasons, DOT staff feels it is appropriate to allow the Port Authority to increase the amount of non-aviation development allowed within the boundaries of the Southwest Florida International Airport as requested through the CPA. Therefore, LCDOT staff recommends transmitting this amendment, with the addition of revised Policy 47.2.1 as identified immediately above.

Please let me know if you need any additional information.

cc: Donna Marie Collins, Chief Assistant County Attorney
Brandon Dunn, Senior Planner, LCDCD
Josh Philpott, Lee County Port Authority
Laura DeJohn, Johnson Engineering



**INTEROFFICE MEMORANDUM
FROM
PUBLIC WORKS
UTILITIES**

Date: May 5, 2011

TO: Brandon Dunn
Senior Planner, Planning Division

From: Howard Wegis
Proj. Manager Sr., Utilities

SUBJECT: CPA 2010-08, RSW Lee Plan Amendment, Utilities Sufficiency Review

Lee County Utilities (LCU) has reviewed the April 14, 2011 response prepared by the applicant's consultant Johnson Engineering and in particular the revised Exhibit IV.B2.a&b, the Potable Water and Sanitary Sewer Analysis. It is LCU's opinion that the revised analysis submitted by the applicant sufficiently addresses the existing and future conditions regarding potable water, sanitary sewer and reclaimed water. More particularly:

Water

Existing Condition

LCU has in service the following water transmission lines available for connection to serve the proposed development: two 12" lines along Daniels Parkway from Chamberlain Parkway to Gateway Boulevard, a 16" line along Chamberlain Parkway, a 30" line along the south side of the Airport, and a 16" line along Fuel Farm Road.

LCU's Green Meadows Water Treatment Plant (WTP) serves the SW International Airport. Presently the plant has a capacity of 9.0 MGD, and the 2009 peak monthly usage was approximately 6.8 MGD, representing a current surplus capacity of 2.2 MGD. In addition, LCU is currently designing an expansion of the Green Meadows WTP to increase its capacity to 10.0 MGD. Further, LCU's existing SFWMD Consumptive Use Permit, which covers LCU's Olga, Corkscrew and Green Meadows water plants includes a permitted allocation of 30.37 MGD of raw water during a maximum month. The three facilities included in this permit produced an annual average daily finished water of 18.95 MGD in 2008.

Future Conditions

LCU agrees with the applicant that an appropriate point of connection would be the dual 16" lines along Daniels Parkway and the recommendation to loop, and connect to, a 16" line constructed from Chamberlain Parkway to Fuel Farm Road for redundancy.

LCU concurs with the analysis presented by the applicant that indicates an additional average day demand of 152,643 gallons per day will be placed on LCU's water system as a result of the proposed amendment. According to the Lee Plan adopted Level of Service for potable water, 250 gallons per day per Equivalent Residential Connection (gpd/ERC), these flows represent an additional required capacity of approximately 620

May 5, 2011
Brandon Dunn
Page Two

ERC's. As stated above LCU's current surplus capacity at the Green Meadows WTP is 2.2 MGD which represents approximately 8,800 ERC's. Following the completion of the Green Meadows WTP expansion to 10.0 MGD a surplus capacity of 12,800 ERC's will be available. Therefore there is currently sufficient capacity to support the proposed amendment. In addition, following expansion of the Green Meadows WTP there will be additional surplus capacity.

Sanitary Sewer

Existing Condition

Currently, the wastewater generated at the Airport is discharged to a LCU owned 10" force main on Chamberlain Parkway and is directed west to the City of Fort Myers Wastewater Treatment Plant for treatment. Currently there are 10", 12" and 24" "dry-line" force mains along Chamberlain and Daniels Parkways that could serve as a point of connection to send wastewater generated at the Airport to LCU's Gateway WWTP. LCU plans to utilize these "dry-lines" to direct wastewater generated at the Airport to the Gateway facility for treatment.

LCU concurs with the applicants projected increase in wastewater flow of 155,000 gallons per day as a result of the proposed amendment. Additionally, LCU agrees with the applicant's assessment that the Red Sox Training facility will also be contributing a projected wastewater flow of 113,000 gallons per day that would be directed to the Gateway WWTP. Further, LCU concurs with the applicant's analysis that considering the existing allocation to the Gateway community of 1.0 MGD and the commitment to serve the Red Sox Facility with 0.113 MGD of capacity, there remains a surplus of 1.887 MGD available to serve the proposed development under this amendment. The projected flow of 0.115 MGD as a result of this amendment will result in a surplus capacity at the Gateway WWTP of 1.772 MGD.

According to the Lee Plan adopted Level of Service for wastewater, 200 gallons per day per Equivalent Residential Connection (gpd/ERC), the proposed development represents 575 ERC's (115,000/200). The total capacity of the Gateway WWTP is 15,000 ERC's (3,000,000/200). Considering the 1.0 MGD (5,000 ERC's) allocated to the Gateway Community, the 0.113 MGD (565 ERC's) dedicated to the Red Sox Facility and the 0.115 MGD (575 ERC's) that would be dedicated to the proposed development under this amendment would result in a surplus capacity of 8,860 ERC's. LCU concurs with the applicant's conclusion that the expanded Gateway WWTP can accommodate the proposed project and maintain the Level of Service specified in the Lee Plan.

Reclaimed Water

LCU concurs with the applicant's assessment of the availability of reclaimed water to serve the project. As the applicant states, currently all reclaimed water produced at the Gateway WWTP is dedicated to the Gateway Community. However, in the future reclaimed water may become available for use by the applicant and the applicant is proposing provisions for accepting reclaimed water in the future when it becomes available.

TABLE 5(a)
Southwest Florida International Airport Development Schedule

Development	Existing (2008 10)	2020	2030
LANDSIDE			
Midfield Terminal Complex	28 gates; 798,000 SF as-built	Expand from 28 gates to 47 gates; 1,278,900 SF (Total 2020 area)	
Auto Access	Entrances at the intersections of Daniels Parkway at Chamberlin Parkway, Paul J. Doherty Parkway, and Fuel Farm Road (located east of Doherty Parkway). Access also from Daniels via Treeline Ave. & Alico Road via Ben Hill Griffin Parkway to Terminal Access Road. Air Cargo Lane improvements from Chamberlin Pkwy. - including a realigned Perimeter Road segment allowing freight transfer within the security fenced, airside/aviation area.	Rehab perimeter service and fuel farm roads. Expand Terminal Access Road entrance to 6 lanes. Construct I-75 access. Connector road for maintenance facilities. New perimeter roads and midfield ATCT and ARFF access roads as part of parallel runway project. Miscellaneous roadway improvements.	
Airport maintenance and Vehicle Maintenance Shop	23,000 SF	Add 6,800 SF to vehicle shop (Total maintenance area 29,800 SF)	
Parking	14,399 total existing spaces		
Passenger	11,461 spaces		
- Hourly	2,519 spaces	Ultimately 5,126 total hourly spaces	
- Daily	8,942 spaces	Ultimately 9,342 total daily spaces	
Employee	1,288 spaces	Total 2,088 employee spaces in 2020	
Taxi/Limo/Toll Booth	150 spaces	Ultimately 200 total Taxi/Limo spaces	
Rental Cars	1,500 spaces in midfield	Ultimately 3,000 total rental car spaces	
Cell Phone Lot	100 spaces		
Airport Training & Conference Center	16,000 SF		
Gun Range	8,500 SF		
Rental Car North Side Service Areas	39,000 SF	Relocate R-A-C service areas to midfield.	
AIRSIDE			
Existing Runway 6-24	12,000 ft. x 150 ft. runway	No improvements planned	
Parallel Runway 6R-24L	Under design	Construct 9,100 x 150 ft. Parallel Runway 6R-24L	
Taxiways	Taxiway A-parallel taxiway to Runway 6-24; 12,000 ft. long x 75 ft. wide. Taxilane B-apron taxilane that runs parallel to former terminal ramp for transitioning aircraft going from ramp to Taxiway A for approximately 1,580 ft. 12,000' parallel S. Taxiway F as-built with midfield construction.	Construct parallel taxiway north of Runway 6R-24L (9,100 ft. x 75 ft. wide). If new large Aircraft (NLA), then 100 ft. wide. Hold bay & bypass improvements to Runway 6L-24R parallel taxiway. Construct dual cross-field connector taxiways. (Approx. 4,215 ft. long x 75 ft. wide). If NLA, then 100 ft. wide. Construct a portion of south dual parallel taxiways with new parallel runway.	
Terminal Apron	165,000 S.Y. at former terminal site; 332,900 S.Y. at midfield as-built	Add 130,000 S.Y. at midfield for total midfield 462,900 S.Y.	
Air Cargo	Total 39,500 SF cargo buildings; 69,000 S.Y. apron area	Expand cargo building facilities to 58,314 SF	
Airline Freight Forwarding (Belly Cargo)	15,000 SF	New freight forwarding (belly cargo) facility of 15,000 SF in midfield area.	
General Aviation	8,000 SF FBO and hangar facility; 26,180 SF hangar space; 48,650 S.Y. apron area	Infrastructure for second FBO. Construct multi-use hangars (129,000 SF). Expand GA apron to 49,700 S.Y.	
Aircraft Maintenance - General Aviation & Large Aircraft	Approximately 13,000 SF	Expand to 36,000 SF as necessary. Construct one hangar to accommodate aircraft including the Boeing 747. Land to accommodate an additional three hangars should be set aside, should it be needed in the future.	
Air Traffic Control Tower (ATCT)	Height 76.91 ft., 8,600 SF	Relocate to midfield - same SF as existing 8,600 ft. or more. New height must be greater than 80 ft. AGL	
Aircraft Rescue and Fire Fighting (ARFF)	14,000 SF	Add midfield ARFF Station	

Development	Existing (2008 10)	2020		2030
Fuel Farm	Commercial: Four (4) 420,000 gallon tanks Jet A. Fuel pumped from existing fuel farm area by a hydrant fueling system to the midfield area. General Aviation: Four (4) 15,000 gallon Jet A tanks. One (1) 12,000 gallon 100LL tank.			
Airline Catering	25,000 SF			
Miscellaneous		Relocate high voltage power lines. Upgrade airfield emergency generator. Helipad (11,000 SF). Develop multi-modal center.		
Rental Car Expansion		Rental car fuel farm.		
NON-AVIATION RELATED LAND USES				
		Option 1	Option 2	
North of Runway 6-24				
Commercial <u>Retail, Restaurant and Service</u>		<u>27,000 SF</u>	<u>27,000 SF</u>	<u>221,750 SF</u>
<u>Gas Station/Convenience Store</u>				<u>5,000 SF w/24 pumps</u>
<u>Hotel</u>				<u>187 Rooms</u>
Light Manufacturing/Assembly		44,300 SF	100,000 SF	<u>147,500 SF</u>
Warehouse/Distribution		100,000 SF	60,800 SF	<u>329,200 SF</u>
Office (This development includes 10 % retail.)		275,000 SF	275,000 SF	<u>162,500 SF</u>
<u>Midfield Area</u>				
<u>Commercial Retail, Restaurant and Service</u> Animal Kennel and Clinic		40,000 SF	40,000 SF	
Hotel		Construct 300 Rooms	Construct 300 Rooms	
Gas Station/Convenience Store		Construct 3,500 SF w/24 pumps	Construct 3,500 SF w/24 pumps	

1. This table is for general phasing and major development items only. More specific details is available in the annual Capital Improvement Plan (CIP) prepared by the Lee County Port Authority for the Southwest Florida International Airport.
2. All non-aviation related development will meet local land development code requirements such as open space requirements listed in LDC Sec. 10-415 and Wetland impacts requirements listed in LDC Sec. 14-293. All development will be required to undergo local site and zoning review prior to local development order issuance. This Development includes 10% retail.
3. Development within the "Potential Future Development Area" will require amendment of the Lee Plan prior to development.

**APPLICATION FOR
COMPREHENSIVE PLAN AMENDMENT (CPA)**

RSW COMPREHENSIVE PLAN AMENDMENT

NOVEMBER 2010

Prepared for:

Lee County Port Authority
11000 Terminal Access Road, Suite 8671
Fort Myers, Florida 33913
(239) 590-4600

RECEIVED
MAY 12 2011

COMMUNITY DEVELOPMENT

Prepared by:

JOHNSON
ENGINEERING
ENGINEERS, SURVEYORS, PLANNERS AND ECOLOGISTS
2122 Johnson Street
Post Office Box 1550
Fort Myers, Florida 33902-1550
(239) 334-0046

CPA


2010-00008

**APPLICATION FOR
RSW COMPREHENSIVE PLAN AMENDMENT (CPA)**

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- ◆ Market Analysis and Needs Assessment



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: 184

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.

11/10/10
DATE

[Signature]
SIGNATURE OF OWNER OR AUTHORIZED REPRESENTATIVE

I. APPLICANT/AGENT/OWNER INFORMATION

Lee County Port Authority

APPLICANT

11000 Terminal Access Road, Suite 8671

ADDRESS

Fort Myers, Florida 33913

CITY, STATE, ZIP

(239) 590-4600

TELEPHONE NUMBER

(239) 590-4688

FAX NUMBER

Johnson Engineering, Inc., Laura DeJohn, AICP

AGENT*

2122 Johnson Street

ADDRESS

Fort Myers, Florida 33901

CITY, STATE, ZIP

(239) 334-0046

TELEPHONE NUMBER

(239) 334-3661

FAX NUMBER

Lee County Port Authority

OWNER(s) OF RECORD

11000 Terminal Access Road, Suite 8671

ADDRESS

Fort Myers, Florida 33913

CITY, STATE, ZIP

(239) 590-4600

TELEPHONE NUMBER

(239) 590-4688

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 24)
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):

Request to amend Policy 1.2.7 and Policy 47.3.4 of the Future Land Use

Element and Table 5(a)SWFIA Development Schedule to allow additional

development within future non-aviation areas.

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

A. Property Location:

1. Site Address: 11000 Terminal Access Road Fort Myers, Florida 33913

2. STRAP(s): 19-45-26-00-00002.0000

B. Property Information

Total Acreage of Property: +/- 6,366 acres

Total Acreage included in Request: The request is a text amendment to change allowable future non aviation development and acreage from 151.66 acres to 351.66 acres.

Total Uplands: refer to Environmental Site Assessment (Ex. IV.C)

Total Wetlands: refer to Environmental Site Assessment (Ex. IV.C)

Current Zoning: AOPD

Current Future Land Use Designation: Airport & Wetlands

Area of each Existing Future Land Use Category: Airport +/-5,220 acres

Wetlands +/-1,146 acres

Existing Land Use: International Airport with aviation operations, aviation support facilities and non-aviation land uses

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

Lehigh Acres Commercial Overlay: N/A

Airport Noise Zone 2 or 3: N/A

Acquisition Area: N/A

Joint Planning Agreement Area (adjoining other jurisdictional lands): N/A

Community Redevelopment Area: N/A

D. Proposed change for the subject property:

No change is proposed to the property as currently approved in the SWFIA Master Plan and Airport Layout Plan (Map 3F). The request is to amend Policy 1.2.7, Policy 47.3.4 and Table 5(a) to allow additional development in the Future Non-Aviation Areas.

E. Potential development of the subject property:

1. Calculation of maximum allowable development under existing FLUM:

Residential Units/Density N/A

Commercial intensity	<u>Refer to attached Table 5(a) for SWFIA maximum allowable development.</u>
----------------------	--

Industrial intensity	<u>Refer to attached Table 5(a) for SWFIA maximum allowable development.</u>
----------------------	--

2. Calculation of maximum allowable development under proposed FLUM:

Residential Units/Density	<u>N/A</u>
---------------------------	------------

Commercial intensity	<u>Refer to attached Table 5(a) for SWFIA maximum proposed allowable development.</u>
----------------------	---

Industrial intensity	<u>Refer to attached Table 5(a) for SWFIA maximum proposed allowable development</u>
----------------------	--

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. (not available on-line, need a copy from LCPA).
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.

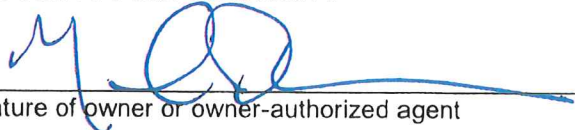
Item 1: Fee Schedule

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, Mark R. Fisher, Deputy Executive Director-Development 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.

LEE COUNTY PORT AUTHORITY


Signature of owner or owner-authorized agent

11/10/10
Date

Mark R. Fisher, A.A.E. Deputy Executive Director-Development
Typed or printed name

STATE OF FLORIDA)
COUNTY OF LEE)

The foregoing instrument was certified and subscribed before me _____ (date), by
_____, who is personally known to me or who has produced
_____ as identification.

(SEAL)

Signature of notary public

Printed name of notary public

**LETTER OF AUTHORIZATION
TO LEE COUNTY COMMUNITY DEVELOPMENT**

The undersigned do hereby swear or affirm that they are the fee simple title holders and owners of record of property commonly known as 19-45-26-00-00002.0000

The property described herein is the subject of an application for comprehensive plan amendment. We hereby designate Johnson Engineering, Inc. as the legal representatives of the property and as such, this entity is authorized to legally bind all owners of the property in the course of seeking the necessary approvals to develop. This authority includes but is not limited to the hiring and authorizing of agents to assist in the preparation of applications, plans, surveys, and studies necessary to obtain zoning, planning and development approval on the site. This representative will remain the only entity to submit/assist with development activity on the property until such time as a new or amended authorization is delivered to Lee County.

LEE COUNTY PORT AUTHORITY



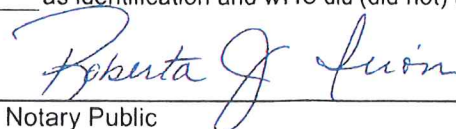
Owner/Authorized Representative (signature)

Mark R. Fisher, A.A.E. Deputy Executive Director -
Development

Printed Name/Title

STATE OF FLORIDA
COUNTY OF LEE

Sworn to (or affirmed) and subscribed before me this 10 day of November, 20 10, by MARK R FISHER who is personally known to me or who has produced as identification and who did (did not) take an oath.



Notary Public



ROBERTA J IRION

(Name typed, printed or stamped)

Exhibit IV.A.1
Summary of Proposed Text Amendments
for
RSW Comprehensive Plan Amendment

The Southwest Florida International Airport (RSW) property comprises approximately 6,366 acres within the Gateway/Airport Planning Community. It falls within the Airport Lands Future Land Use Category on the Future Land Use Map of the Lee Plan. Within the Airport boundary, some land is also designated Wetlands.

Policy 1.2.1 of the Lee Plan provides that “Airport Lands includes the existing facility and projected growth areas for the Southwest Florida International Airport...through the year 2030.” The Policy states that “future development at the Southwest Florida International Airport will also include non-aviation related land uses such as hotels/motels, light industrial, service stations, ancillary retail/shopping, and office development.”

The Southwest Florida International Airport Master Plan, Airport Layout Plan, and Development Schedule was incorporated in the Lee Plan by Ordinance 04-16 pursuant to Florida Statutes Section 163.3177(6)(k). Location and parameters for development of these non-aviation uses are reflected on the Airport Layout Plan adopted as Map 3F of the Lee Plan, and the Development Schedule adopted as Table 5(a) of the Lee Plan.

Map 3F shows areas for existing and future aviation and non-aviation development at RSW. Non-aviation development areas are depicted in three general areas of the airport property: the Midfield area, the area North of Runway 6-24, and the potential future development area South of the Midfield.

Table 5(a) indicates development potential in aviation and non-aviation areas with a timeframe through 2020. Development potential in non-aviation areas is listed as follows:

<i>Excerpt from Lee Plan Table 5(a)</i>			
Southwest Florida International Airport Development Schedule			
Non Aviation Development	Existing (2008)	2020	
		Option 1	Option 2
Commercial and Service			
Animal Kennel and Clinic		40,000 SF	40,000 SF
Hotel		300 rooms	300 rooms
Light Manufacturing/Assembly		44,300 SF	100,000 SF
Gas Station/Convenience Store		3,500 SF w/ 24 pumps	3,500 SF w/ 24 pumps
Warehouse/Distribution		100,000 SF	60,800 SF
Office (This development includes 10% retail.)		275,000 SF	275,000 SF

Lee Plan Policy 1.2.7 specifies that development within future non-aviation areas designated on the Airport Layout Plan (Map 3F) is limited to a total of 100 acres. The Policy states that development of additional acreage will require prior Lee Plan amendment approval.

In 2000, the $\pm 6,366$ -acre Airport property was rezoned from Airport Operations Planned Development (AOPD), AG-2, IL, and IG to AOPD to permit the relocation of terminal facilities and related support facilities by Resolution Number Z-00-037.

In 2006, the AOPD was amended by Resolution Number Z-06-030 to add non-aviation related uses and to provide 100 acres of development area (Parcels A-G), and 51.66 acres near the midfield terminal on the AOPD Master Concept Plan within the non-aviation land areas designated on the adopted Airport Layout Plan.

The Port Authority seeks approval of additional non-aviation development through the year 2030 in the non-aviation lands depicted on Map 3F. Per Policy 1.2.7, a comprehensive plan amendment is necessary to allow development of additional acreage. This comprehensive plan amendment request is limited to the following text amendments:

- Amend Policy 1.2.7 to reflect additional acreage allowed for non-aviation development.
- Amend Policy 47.3.4 to indicate that non-aviation uses are scheduled through 2030 in Development Schedule Table 5(a).
- Amend Development Schedule Table 5(a) in order to reflect additional square feet of development in the non-aviation area North of Runway 6-24.

The proposed non-aviation development is consistent with the non-aviation areas and uses in the adopted Airport Layout Plan. This comprehensive plan amendment does not involve a map change to the Future Land Use Map designation of Airport Lands, and does not involve a change to the Airport Layout Plan (Map 3F) as adopted.

The proposed amendment to Policy 1.2.7 is an update to the current limitation of 100 acres of development in future non-aviation areas. This comprehensive plan amendment request is to clarify that 51.66 acres of development is allowed to occur within the Midfield non-aviation areas and to change the limit of allowable non-aviation development area North of Runway 6-24 from 100 acres to 300 acres.

This request is for allowable non-aviation development area totaling 351.66 acres. The total of 300 acres within the northern non-aviation area is derived from the development potential determined in the Market Analysis and Needs Assessment Memo dated August 20, 2010 by Real Estate Research Consultants, Inc. (RERC) provided with this application. The amendment to Table 5(a) is requested to reflect the additional development potential determined by the market analysis through 2030.

The proposed amendments are provided in strikethrough/underline format on the following pages.

Exhibit IV.A.1 - Attachment A
Narrative of Existing Land Use and Zoning
for
RSW Comprehensive Plan Amendment

Existing Land Use of Subject Property

The Airport property has a future land use designation of Airport with portions designated in the Wetlands future land use category, which is illustrated on the Current and Proposed Future Land Use Map Exhibit IV.A.2 & IV.A.3 accompanying this application.

The property is currently developed and operated as Southwest Florida International Airport (RSW). Existing uses at the Airport property include airport facilities associated with an international airport, as regulated and approved by the Federal Aviation Administration. The existing and proposed uses on Airport property are identified on the Airport Layout Plan according to the land use, transportation, environmental, safety and operational issues addressed during the Airport Master Planning process. The Airport property can be described according to three general areas:

The area North of Runway 6-24 consists of existing rental car facilities, water management and conservation areas, aviation related uses, fueling area, flight services, the Training Center, the Airport Surveillance Radar (ASR) tower, Air Traffic Control tower, Airport Vortac, airport vehicle maintenance, pistol shooting range, and proposed Non-Aviation Lands that include 100 acres approved for office, manufacturing, and warehouse uses known as the Madden Research Loop by zoning resolution Z-06-030. The proposed additional 200 acres of non-aviation development occupies the northern non-aviation areas of the Airport property. Future rental car facilities and future Passenger Multi-modal facilities are also anticipated in the northwest area of the property along Treeline Avenue.

The Midfield Terminal Area consists of the terminal, Runway 6-24 and parking to serve more than 20,500 daily passengers, with 51.66 acres of non-aviation development area approved for hotel and commercial uses (proposed gas station and animal kennel) by zoning resolution Z-06-030. A future parallel runway to the south of the terminal is proposed and shown on the adopted Airport Layout Plan. Future parking areas, Air Traffic Control Tower, Aircraft Rescue and Fire Fighting facility, and Airport Rotating Beacon are also anticipated in the Midfield area.

The South Area is currently undeveloped, and is proposed for detention, aviation related uses, and future potential non-aviation uses. An existing FPL Power Transmission line is proposed to be relocated along the south property line and east property line to resolve conflict with the future parallel runway. Well head locations are also anticipated along the southeast edge of the Airport property.

Existing Zoning of Subject Property

The subject property is zoned Airport Operations Planned Development (AOPD). In 2000, the ±6,366-acre Airport property was rezoned from AOPD, AG-2, IL, and IG to AOPD to permit the relocation of terminal facilities and related support facilities by Resolution Number Z-00-037.

In 2006, the AOPD was amended by Resolution Number Z-06-030 to add non-aviation related uses and to provide 100 acres of development area (Parcels A-G) in the northern non-aviation lands, and 51.66 acres near the midfield terminal. The AOPD Master Concept Plan was updated, and this action superseded all prior zoning resolutions.

The AOPD allows for aviation and non-aviation uses according to the AOPD permitted uses in the Land Development Code. The Master Plan depicts existing and proposed development areas and related indigenous preserves, access, and buffers for the allowable development.

Existing Land Use & Zoning of Surrounding Property

Surrounding Properties to the North

Surrounding the Airport property to the north are areas designated as New Community (Gateway), and Tradeport on the Future Land Use Map. A small portion of the Airport property lying north of Daniels Parkway is bordered by land area within the City of Fort Myers and designated as Traditional Community (Arborwood) on the City's Future Land Use Map.

Existing uses to the north of the Airport include a mix of agricultural, commercial, industrial, office, educational and recreational facilities. From the west, there is agricultural and natural land zoned Commercial Intensive and Conservation on the City of Fort Myers Zoning Map; smaller industrial and flex space buildings zoned Tourist Commercial and General Commercial; the under-construction Boston Red Sox Spring Training Facility zoned Mixed Planned Development; and a mix of uses within the Gateway Community zoned PUD and MPD, which include Gateway K-8 Charter School, office/flex buildings, Gateway Charter High School, business condominiums including a Comcast facility, the Worthington Commerce Park with warehousing and distribution, and agricultural and natural land associated with the Gateway DRI.

Surrounding Properties to the West

Surrounding the Airport property to the west are areas designated as Tradeport on the Future Land Use Map.

Existing uses include a mix of undeveloped land, industrial, and office facilities. To the northwest of the Airport property, existing uses are primarily agricultural pasture land

zoned AG-2, and undeveloped land zoned General Commercial. Across Treeline Avenue to the west is Southwest International Commerce Park, a subdivided industrial park zoned IPD with some occupied sites used for parking, industrial, warehousing, and distribution. Additional undeveloped property is located along the remainder of the west side of Treeline Avenue, zoned AG-2.

Surrounding Properties to the South

Surrounding the Airport property to the south are areas designated as Tradeport and Density Reduction Groundwater Recharge (DRGR), with a small site designated Public Facilities, and some areas designated as Wetland on the Future Land Use Map.

Existing uses include a mix of undeveloped land, agricultural, industrial, and mining land. To the southwest is the Airport Crossings development including proposed industrial, commercial, hotel and parking uses and zoned MPD. Agricultural grazing land zoned AG-2 extends along the south boundary of the Airport, which is subject to pending applications for DRI and MPD to allow industrial, office, retail, and hotel uses. The Green Meadow Water Treatment Plant zoned AG-2 is accessed from Airport Haul Road and abuts the southern boundary of the Airport. The IHUB project is zoned IPD and abuts the Airport property to the south, and is proposed to include industrial, heavy commercial, research and limited retail uses. There is also a mining operation zoned AG-2 adjoining the Airport to the south.

Surrounding Properties to the East

Surrounding the Airport property to the east are areas designated as DRGR, Conservation Lands Upland, Conservation Land Wetland, and Wetland on the Future Land Use Map.

Along the southeast boundary of the Airport property is a Lee County utility facility zoned AG-2. The remainder of the eastern property line is bordered by natural, undeveloped land and some agricultural grazing land all zoned AG-2. The proposed large scale multi-use Fountains DRI application remains in the permitting process, and was submitted to include residential, commercial, warehouse, hotel, and golf course occupying 2,769 acres between the Airport Property and SR 82 to the east.

**RSW Comprehensive Plan Amendment
Proposed Text Amendments
in strikethrough/underline format**

POLICY 1.2.7: Future non-aviation areas depicted on the Airport Layout Plan (Map 3F) will be developed, to the greatest extent possible, only within existing upland areas. Impacts to wetlands in the future non-aviation areas will be minimized by site design, whenever possible, in compliance with the Lee County Land Development Code. ~~Development within the future non-aviation area, as designated on Map 3F, is limited to a total of 100 acres.~~ Development within the non-aviation areas, as shown on Map 3F, is limited to a maximum of 300 acres north of runway 6-24 and 51.66 acres within the midfield terminal area. All non-aviation development must be in compliance with Map 3F and the intensities outlined in Table 5(a). Development of additional acreage will require prior Lee Plan amendment approval. (Added by Ordinance 04-16, Amended by Ordinance xx-xx)

POLICY 47.3.4: The proposed development schedule for the Southwest Florida International Airport through the year 2020 for landside and airside uses and through the year 2030 for non-aviation uses is depicted in Table 5(a) of the Lee Plan. The proposed development schedule for the Page Field General Aviation Airport through the year 2025 is depicted in Table 5(b) of the Lee Plan. These Tables include both aviation and non-aviation related development. If the FAA/FDOT mandate navigational improvements (NAVAIDS) or require improvements related to Airport security or safety at Southwest Florida International Airport or Page Field General Aviation Airport, then the Port Authority may pursue installation of the improvement even though the improvement is not specifically identified on Table 5(a) or Table 5(b). However, the Port Authority must obtain all appropriate approvals and permits prior to installation, including approval from Lee County. If these improvements precipitate a substantive change to Table 5(a), Table 5(b), Map 3F, or Map 3G, then the Port Authority must pursue a Lee Plan amendment incorporating the changes in the next available amendment cycle. (Added by Ordinance No. 04-16, Amended by Ordinance No. 09-14, xx-xx)

TABLE 5(A)
Southwest Florida International Airport Development Schedule

Development	Existing (200810)	Existing - 2020	2020 - 2030
LANDSIDE			
Midfield Terminal Complex	28 gates; 798,000 SF as-built	Expand from 28 gates to 47 gates; 1,278,900 SF (Total 2020 area)	
Auto Access	Entrances at the intersections of Daniels Parkway at Chamberlin Parkway, Paul J. Doherty Parkway, and Fuel Farm Road (located east of Doherty Parkway). Access also from Daniels via Treeline Ave. & Alico Road via Ben Hill Griffin Parkway to Terminal Access Road. Air Cargo Lane improvements from Chamberlin Pkwy. - including a realigned Perimeter Road segment allowing freight transfer within the security fenced, airside/aviation area.	Rehab perimeter service and fuel farm roads. Expand Terminal Access Road entrance to 6 lanes. Construct 1-75 access. Connector road for maintenance facilities. New perimeter roads and midfield ATCT and ARFF access roads as part of parallel runway project. Miscellaneous roadway improvements.	
Airport maintenance and Vehicle Maintenance Shop	23,000 SF	Add 6,800 SF to vehicle shop (Total maintenance area 29,800 SF)	
Parking	14,399 total existing spaces		
Passenger	11,461 spaces		
- Hourly	2,519 spaces	Ultimately 5,126 total hourly spaces	
- Daily	8,942 spaces	Ultimately 9,342 total daily spaces	
Employee	1,288 spaces	Total 2,088 employee spaces in 2020	
Taxi/Limo/Toll Booth	150 spaces	Ultimately 200 total Taxi/Limo/spaces	
Rental Cars	1,500 spaces in midfield	Ultimately 3,000 total rental car spaces	
Cell Phone Lot	100 spaces		
Airport Training & Conference Center	16,000 SF		
Gun Range	8,500 SF		
Rental Car North Side Service Areas	39,000 SF	Relocate R-A-C service areas to midfield	
AIRSIDE			
Existing Runway 6-24	12,000 ft. x 150 ft. runway	No improvements planned	
Parallel Runway 6R-24L	Under design	Construct 9,100 x 150 ft. Parallel Runway 6R-24L	
Taxiways	Taxiway A-parallel taxiway to Runway 6-24; 12,000 ft. long x 75 ft. wide. Taxiway B-apron taxiway that runs parallel to former terminal ramp for transitioning aircraft going from ramp to Taxiway A for approximately 1,580 ft. 12,000' parallel S. Taxiway F as-built with midfield construction.	Construct parallel taxiway north of Runway 6R-24L (9,100 ft. x 75 ft. wide). If new large Aircraft (NLA), then 100 ft. wide. Hold bay & bypass improvements to Runway 6L-24R parallel taxiway. Construct dual cross-field connector taxiways. (Approx. 4,215 ft. long x 75 ft. wide). If NLA, then 100 ft. wide. Construct a portion of south dual parallel taxiways with new parallel runway.	
Terminal Apron	165,000 S.Y. at former terminal site; 332,900 S.Y. at midfield as-built	Add 130,000 S.Y. at midfield for total midfield 462,900 S.Y.	
Air Cargo	Total 39,500 SF cargo buildings; 69,000 S.Y. apron area	Expand cargo building facilities to 58,314 SF	
Airline Freight Forwarding (Belly Cargo)	15,000 SF	New freight forwarding (belly cargo) facility of 15,000 SF in midfield area.	

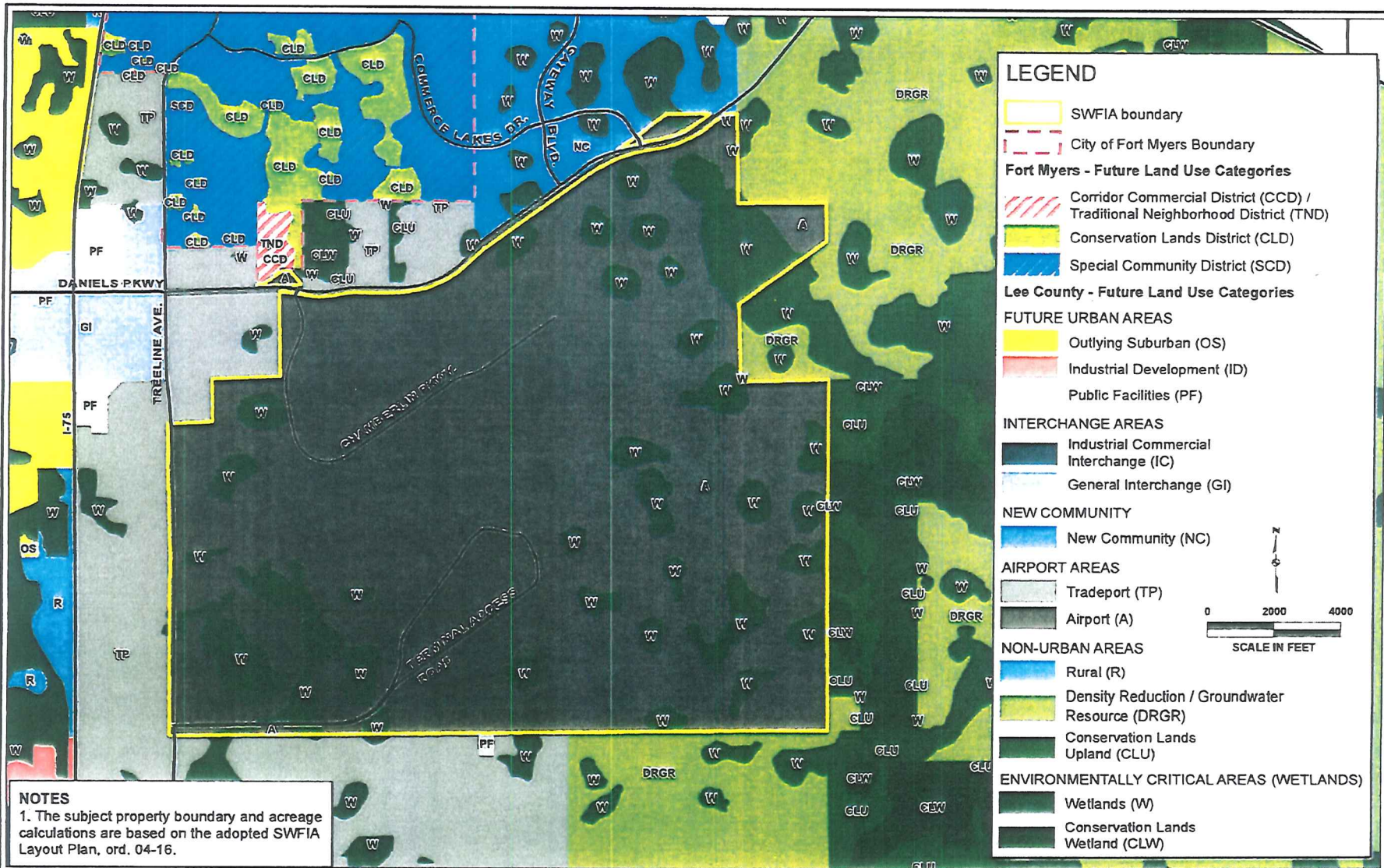
Development	Existing (200810)	Existing - 2020		2020 - 2030
General Aviation	8,000 SF FBO and hangar facility; 26,180 SF hangar space; 48,650 S.Y. apron area	Infrastructure for second FBO. Construct multi-use hangars (129,000 SF). Expand GA apron to 49,700 S.Y.		
Aircraft Maintenance - General Aviation & Large Aircraft	Approximately 13,000 SF	Expand to 36,000 SF as necessary. Construct one hangar to accommodate aircraft including the Boeing 747. Land to accommodate an additional three hangars should be set aside, should it be needed in the future.		
Air Traffic Control Tower (ATCT)	Height 76.91 ft., 8,600 SF	Relocate to midfield - same SF as existing 8,600 ft. or more. New height must be greater than 80 ft. AGL		
Aircraft Rescue and Fire Fighting (ARFF)	14,000 SF	Add midfield ARFF Station		
Fuel Farm	Commercial: Four (4) 420,000 gallon tanks Jet A. Fuel pumped from existing fuel farm area by a hydrant fueling system to the midfield area. General Aviation: Four (4) 15,000 gallon Jet A tanks. One (1) 12,000 gallon 100LL tank.			
Airline Catering	25,000 SF			
Miscellaneous		Relocate high voltage power lines. Upgrade airfield emergency generator. Helipad (11,000 SF). Develop multi-modal center.		
Rental Car Expansion		Rental car fuel farm.		
Non-Aviation Related Land Uses		Option 1	Option 2	
North of Runway 6-24				
Commercial Retail, Restaurant and Service		27,000 SF	27,000 SF	221,750 SF
Gas station/convenience store				5,000 SF w/ 24 pumps
Hotel				187 rooms
Light Manufacturing/Assembly		44,300 SF	100,000 SF	147,500 SF
Warehouse/Distribution		100,000 SF	60,800 SF	329,200 SF
Office (This development includes 10% retail.)		275,000 SF	275,000 SF	162,500 SF
Midfield Area				
Commercial Retail, Restaurant and Service		40,000 SF	40,000 SF	
Animal Kennel and Clinic				
Hotel		Construct 300 Rooms	Construct 300 Rooms	
Gas Station/Convenience Store		Construct 3,500 SF w/24 pumps	Construct 3,500 SF w/24 pumps	

1. This table is for general phasing and major development items only. More specific details is available in the annual Capital Improvement Plan (CIP) prepared by the Lee County Port Authority for the Southwest Florida International Airport.

2. All non-aviation related development will meet local land development code requirements such as open space requirements listed in LDC Sec. 10-415 and Wetland impacts requirements listed in LDC Sec. 14-293. All development will be required to undergo local site and zoning review prior to local development order issuance. This Development includes 10% retail.

3. Development within the "Potential Future Development Area" will require amendment of the Lee Plan prior to development.

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Lee County, Florida

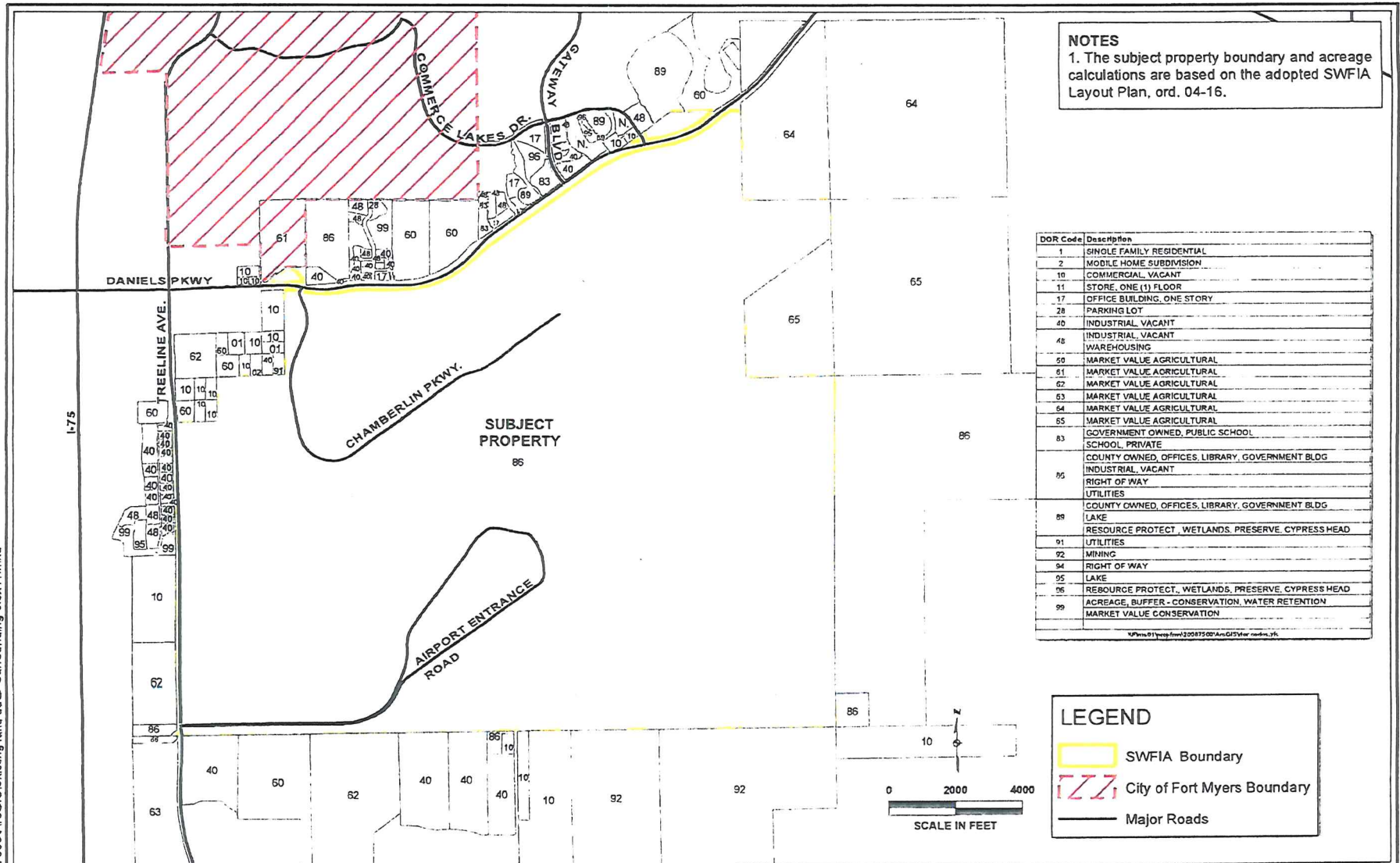
JOHNSON
ENGINEERING

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PHONE (941) 334-0046
FAX (941) 334-3661
E.B. #642 & L.B. #642

Current and Proposed
Future Land Use Map

DATE	PROJECT NO.	FILE NO.	SCALE	SHEET
April 2010	20087500	-	As Shown	IV.A.2 & IV.A.3

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SWFIA
Lee County, Florida

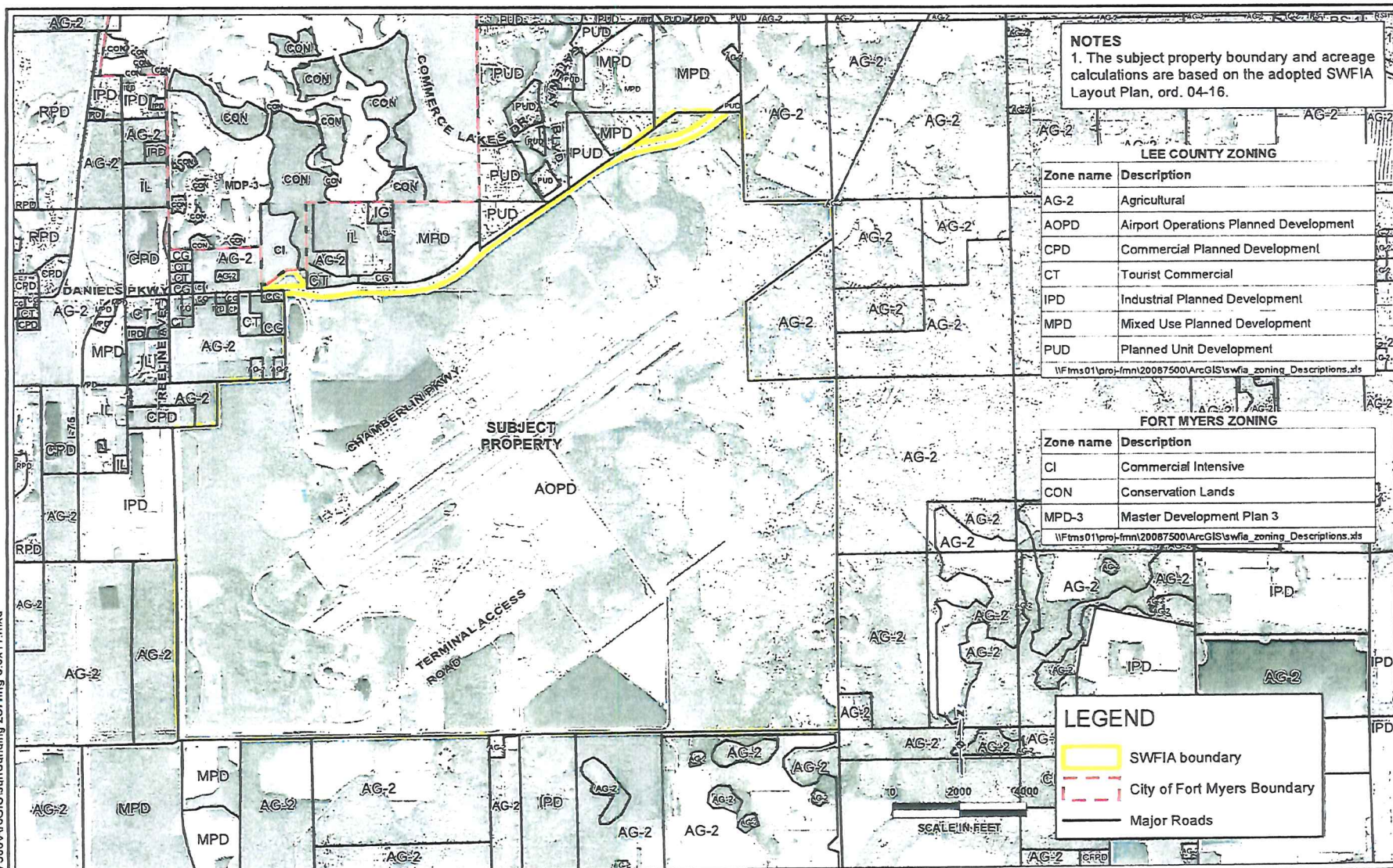
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Surrounding Existing Land Use Map

DATE	PROJECT NO.	FILE NO.	SCALE	SHEET
April 2010	20087500	-	As Shown	IV.A.4

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Surrounding Zoning Map

DATE	PROJECT NO.	FILE NO.	SCALE	SHEET
April 2010	20087500	-	As Shown	IV.A.5

JOHNSON ENGINEERING, INC.

FORT MYERS
NAPLES
PORT CHARLOTTE

ENGINEERS, SURVEYORS, PLANNERS AND ECOLOGISTS

April 21, 2000

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33902-1530

CARL E. JOHNSON
1911-1982

LEGAL DESCRIPTION

SOUTHWEST FLORIDA INTERNATIONAL AIRPORT
PARCELS A, B, C AND D
SECTIONS 23, 24, 25, 26, 35 AND 36
TOWNSHIP 45 SOUTH, RANGE 25 EAST; AND
SECTIONS 17, 18, 19, 20, 29, 30, 31 AND 32
TOWNSHIP 45 SOUTH, RANGE 26 EAST
ALL IN LEE COUNTY, FLORIDA

PARCEL A

A tract or parcel of land lying in Sections 23, 24, 25, 26, 35 and 36 in Township 45 South, Range 25 East, and in Sections 17, 18, 19, 20, 29, 30, 31 and 32 in Township 45 South, Range 26 East, all in Lee County, Florida, and being more particularly described as follows:

Commencing at the southwest corner of the Southwest Quarter (SW-1/4) of Section 35, Township 45 South, Range 25 East, thence run N 89° 20' 16" E a distance of 1321.80 feet to the Point of Beginning. From said Point of Beginning run N 00° 34' 17" W a distance of 2654.20 feet; thence run N 00° 21' 15" E a distance of 2654.86 feet to a point lying along the north line of the Northwest Quarter (NW-1/4) of Section 35, Township 45 South, Range 25 East; thence run N 02° 05' 25" W along the west line of the East Half (E-1/2) of the Southwest Quarter (SW-1/4) of Section 26, Township 45 South, Range 25 East a distance of 2655.48 feet; thence run N 00° 49' 34" W along the west line of the Southeast Quarter (SE-1/4) of the Northwest Quarter (NW-1/4) of the aforementioned Section 26 a distance of 1320.31 feet; thence run N 87° 59' 48" E along the north line of the Southeast Quarter (SE-1/4) of the Northwest Quarter (NW-1/4) of the aforementioned Section 26 a distance of 1356.41 feet; thence run N 01° 04' 03" W along the west line of the Northeast Quarter (NE-1/4) of the aforementioned Section 26 a distance of 1317.08 feet to the northwest corner of the Northeast Quarter (NE-1/4) of the aforementioned Section 26; thence run N 88° 04' 46" E along the south line of the Southeast Quarter (SE-1/4) of Section 23, Township 45 South, Range 25 East a distance of 2027.84 feet; thence run N 01° 04' 08" W along the west line of the East Half (E-1/2) of the East Half (E-1/2) of the Southeast Quarter (SE-1/4) of the aforementioned Section 23 for 2542.82 feet to a point on a non-tangent curve on the southerly line of Daniels Parkway (transitioning from 200 feet to 270 feet wide); thence run along said southerly line through said Sections 23 and 24 in Township 45 South, Range 25 East and Sections 19, 18 and 17 in Township 45 South, Range 26 East for the following courses: southeasterly along the arc of a curve to the right of radius 2191.83 feet (delta 09° 36' 28") (chord 367.11 feet) (chord bearing S 85° 27' 02" E) for 367.54 feet to a point of tangency; thence S 80° 38' 48" E for 435.96 feet to a point of curvature; thence

CHAIRMAN
FORREST H. BANKS

PRESIDENT
STEVEN K. MORRISON

PARTNERS
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KENTON R. KEILING
PATRICIA H. NEWTON
W. BRITT POMEROY
ANDREW D. TILTON
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KEVIN M. WINTER

ASSOCIATES
LONNIE V. HOWARD
MICHAEL L. LOHR
MICHAEL W. NORMAN
CHURCH L. ROBERTS IV
BARRY E. SYREN

Applicant's Legal Checked

by EG 6/23/2004

Exhibit A
Page 1 of 6

southeasterly and easterly along the arc of a curve to the left of radius 2391.83 feet (delta $18^{\circ} 04' 40''$) (chord 751.53 feet) (chord bearing $S 89^{\circ} 41' 08'' E$) for 754.65 feet to a point of tangency; thence $N 81^{\circ} 16' 32'' E$ for 542.86 feet to a point of curvature; thence northeasterly along the arc of a curve to the right of radius 2181.83 feet (delta $08^{\circ} 50' 48''$) (chord 336.55 feet) (chord bearing $N 85^{\circ} 41' 56'' E$) for 336.88 feet to a point of tangency; thence $S 89^{\circ} 52' 40'' E$ for 1090.00 feet to a point of curvature; thence northeasterly along the arc of a curve to the left of radius 2980.56 feet (delta $42^{\circ} 49' 14''$) (chord 2176.07 feet) (chord bearing $N 68^{\circ} 42' 43'' E$) for 2227.55 feet to a point of tangency; thence $N 47^{\circ} 18' 06'' E$ for 623.86 feet to a point of curvature; thence northeasterly along the arc of a curve to the right of radius 2181.83 feet (delta $06^{\circ} 41' 54''$) (chord 254.93 feet) (chord bearing $N 50^{\circ} 39' 03'' E$) for 255.07 feet to a point of tangency; thence $N 54^{\circ} 00' 00'' E$ for 3655.05 feet to a point of curvature; thence northeasterly along the arc of a curve to the right of radius 4473.66 feet (delta $24^{\circ} 00' 00''$) (chord 1860.25 feet) (chord bearing $N 66^{\circ} 00' 00'' E$) for 1873.92 feet to a point of tangency; thence $N 78^{\circ} 00' 00'' E$ for 586.36 feet to a point of curvature; thence northeasterly along the arc of a curve to the left of radius 3384.04 feet (delta $24^{\circ} 00' 00''$) (chord 1407.16 feet) (chord bearing $N 66^{\circ} 00' 00'' E$) for 1417.50 feet to a point of tangency; thence $N 54^{\circ} 00' 00'' E$ for 737.49 feet; thence run $N 89^{\circ} 30' 50'' E$ along the north line of the Southwest Quarter (SW-1/4) of said Section 17 for 345.05 feet to the northeast corner of said fraction; thence run $S 01^{\circ} 00' 03'' E$ along the west line of said Southeast Quarter (SE-1/4) for 2563.49 feet to the southwest corner of said fraction; thence run $N 89^{\circ} 27' 32'' E$ along the south line of said fraction for 2643.37 feet to the northeast corner of said Section 20, Township 45 South, Range 26 East; thence run $S 01^{\circ} 25' 31'' E$ along the east line of the Northeast Quarter (NE-1/4) of the aforementioned Section 20 a distance of 1163.82 feet; thence run $S 54^{\circ} 00' 06'' W$ a distance of 3219.77 feet; thence run $S 01^{\circ} 14' 49'' E$ a distance of 2341.65 feet to the southwest corner of the Southeast Quarter (SE-1/4) of the aforementioned Section 20; thence run $N 88^{\circ} 19' 17'' E$ along the south line of the Southeast Quarter (SE-1/4) of the aforementioned Section 20 a distance of 2658.48 feet to the southeast corner of the aforementioned Section 20; thence run $S 00^{\circ} 01' 11'' W$ along the east line of the Northeast Quarter (NE-1/4) of Section 29, Township 45 South, Range 26 East a distance of 2581.60 feet to the southeast corner of the Northeast Quarter (NE-1/4) of said Section 29; thence run $S 00^{\circ} 01' 11'' W$ along the east line of the Southeast Quarter (SE-1/4) of said Section 29 a

distance of 2581.60 feet to the southeast corner of the Southeast Quarter (SE-1/4) of said Section 29; thence run S 00° 24' 19" E along the east line of the Northeast Quarter (NE-1/4) of Section 32, Township 45 South, Range 26 East a distance of 2657.00 feet to the southeast corner of the Northeast Quarter (NE-1/4) of said Section 32; thence run S 00° 24' 19" E along the east line of the Southeast Quarter (SE-1/4) of said Section 32 a distance of 2657.02 feet to the southeast corner of the Southeast Quarter (SE-1/4) of said Section 32; thence run S 89° 25' 27" W along the south line of the Southeast Quarter (SE-1/4) of said Section 32 a distance of 2645.47 feet to the southwest corner of the Southeast Quarter (SE-1/4) of said Section 32; thence run S 89° 31' 23" W along the south line of the Southwest Quarter (SW-1/4) of said Section 32 a distance of 2649.58 feet to the southwest corner of said Section 32; thence run S 89° 17' 39" W along the south line of the Southeast Quarter of Section 31, Township 45 South, Range 26 East a distance of 2638.68 feet to the southwest corner of the Southeast Quarter (SE-1/4) of said Section 31; thence run S 89° 22' 14" W along the south line of the Southwest Quarter (SW-1/4) of said Section 31 a distance of 2506.33 feet to the southwest corner of said Section 31; thence run S 89° 08' 03" W along the south line of the Southeast Quarter (SE-1/4) of Section 36, Township 45 South, Range 25 East a distance of 2643.51 feet to the southwest corner of the Southeast Quarter of said Section 36; thence run S 89° 08' 03" W along the south line of the Southwest Quarter (SW-1/4) of said Section 36 a distance of 2643.52 feet to the southwest corner of said Section 36; thence run S 89° 20' 02" W along the south line of the Southeast Quarter (SE-1/4) of Section 35, Township 45 South, Range 25 East a distance of 2645.02 feet to the southwest corner of the Southeast Quarter (SE-1/4) of said Section 35; thence run S 89° 20' 16" W along the south line of the East Half (E-1/2) of the Southwest Quarter (SW-1/4) of said Section 35 a distance of 1321.83 feet to the Point of Beginning.

Containing 6337.227 acres, more or less.

TOGETHER WITH (added to Parcel A):

PARCEL B

A tract or parcel of land lying in the East Half (E-1/2) of the Northeast Quarter (NE-1/4) of Section 23, Township 45 South, Range 25 East, Lee County, Florida, which tract or parcel is described as follows:

From the southeast corner of said Northeast Quarter (NE-1/4) run

N 00° 17' 41" W along the east line of said fraction for 94.00 feet to the north line of Daniels Parkway; thence run S 88° 39' 26" W along said north line for 49.46 feet to the Point of Beginning.

From said Point of Beginning continue along said north line S 88° 39' 26" W for 572.96 feet and S 88° 07' 09" W for 727.86 feet to the west line of the East Half (E-1/2) of the Northeast Quarter (NE-1/4) of said Section; thence run N 00° 43' 22" E along said west line for 25.51 feet; thence departing said west line and running through the Northeast Quarter (NE-1/4) of said Section 23 the following courses: thence N 88° 06' 12" E for 165.23 feet; thence N 54° 36' 12" E for 729.30 feet; thence N 88° 10' 25" E for 219.31 feet; S 40° 25' 15" E for 494.87 feet; thence S 00° 17' 50" E parallel with the east line of the Northeast Quarter (NE-1/4) of said Section for 46.34 feet to the Point of Beginning.

Containing 7.114 acres, more or less.

TOGETHER WITH (to be added to Parcels A and B):

PARCEL C

A tract or parcel of land lying in the Southeast Quarter (SE-1/4) of Section 18, Township 45 South, Range 26 East, Lee County, Florida, which tract or parcel is described as follows:

From the southeast corner of said fraction run N 00° 58' 41" W along the east line of said fraction for 1870.26 feet to an intersection with the northerly right-of-way line of Daniels Parkway; (the following two courses being along and coincident with said northerly right-of-way line) thence S 78° 00' 00" W a distance of 233.32 feet to a point of curvature with a tangent circular curve, concave to the south; thence along said curve, having for its elements a radius of 4743.66 feet, a central angle of 01° 12' 20", a chord distance of 99.81 feet, a chord bearing of S 77° 23' 50" W, and an arc distance of 99.81 feet to the Point of Beginning.

From said Point of Beginning; thence continue along said northerly right-of-way line along a tangent circular curve, concave to the south, having for its elements a radius of 4743.66 feet, a central angle of 07° 46' 39", a chord distance of 643.42 feet, a chord bearing of S 72° 54' 20" W, and an arc distance of 643.92 feet; thence N 54° 00' 00" E a distance of 655.83 feet; thence S 36° 00' 00" E a distance of 62.75 feet to a point of curvature with a tangent circular curve, concave to the west; thence along said curve, having for its elements a radius of 180.00 feet, a central angle of 23° 31' 09", a chord distance of 73.37 feet, a chord bearing of S 24° 14' 26" E, and an arc distance of 73.89 feet; thence S 12° 28' 51" E a distance of 80.59 feet to the Point of Beginning.

Containing 1.514 acres, more or less.

TOGETHER WITH (to be added to Parcels A, B and C):

PARCEL D

A tract or parcel of land lying in the Southwest Quarter (SW-1/4) of Section 17 and the Southeast Quarter (SE-1/4) of Section 18, Township 45 South, Range 26 East, Lee County, Florida, which tract or parcel is described as follows:

From the southeast corner of said Southeast Quarter (SE-1/4) of said Section 18 run N 00° 58' 41" W along the east line of said fraction for 1870.26 feet to the Point of Beginning, said point also lying along the northerly right-of-way line of Daniels parkway.

From said Point of Beginning; thence S 78° 00' 00" W along said north right-of-way line a distance of 213.12 feet; thence N 12° 28' 51" W a distance of 80.55 feet to a point of curvature with a tangent circular curve, concave to the west; thence along said curve, having for its elements a radius of 300.00 feet, a central angle of 23° 31' 07", a chord distance of 122.28 feet, a chord bearing of N 24° 14' 40" W, and an arc distance of 123.15 feet; thence N 36° 00' 00" W a distance of 62.75 feet; thence N 54° 00' 00" E a distance of 1026.83 feet; thence N 89° 30' 50" E a distance of 1301.13 feet to an intersection with the northerly right-of-way line of Daniels Parkway; thence S 54° 00' 00" W a distance of 359.16 feet to a point of curvature with a tangent circular curve, concave to the northwest; thence along said curve, having for its elements a radius of 3114.04 feet, a central angle of 24° 00' 00", a chord distance of 1294.89 feet, a chord bearing of S 66° 00' 00" W, and an arc distance of 1304.41 feet; thence run S 78° 00' 00" W a distance of 353.04 feet to said Point of Beginning.

Containing 20.625 acres, more or less.

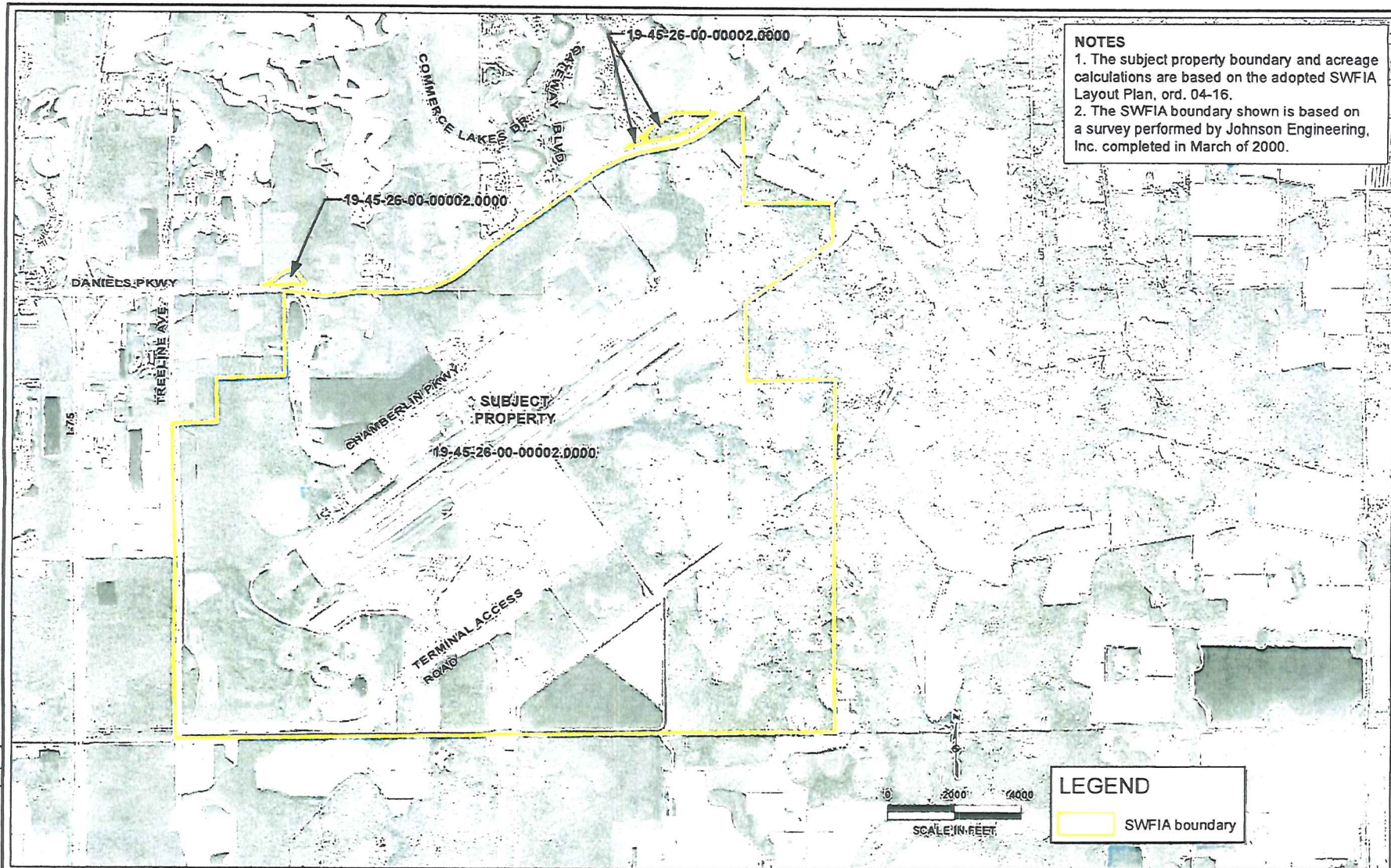
Said Southwest Florida International Airport (Parcels A, B, C and D) contains 6366.479 acres, more or less.

19991683

Exhibit IV.A.7
Deed Information

Copies of all deeds for the subject property are on file at the Lee County Port Authority Offices.

\\miso1\proj\rmn\20087500\ArcGIS\property lines 8.5x11.mxd



SWFIA
Lee County, Florida

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ENGINEERING

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Aerial Photograph Showing Property Lines

DATE	PROJECT NO.	FILE NO.	SCALE	SHEET
April 2010	20087500	-	As Shown	IV.A.8

SOUTHWEST FLORIDA INTERNATIONAL AIRPORT (RSW)

COMPREHENSIVE PLAN AMENDMENT

Traffic Circulation Analysis Exhibit IV.B.1

Prepared for:



Prepared by:



October 2010

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1.0 INTRODUCTION

The Lee County Port Authority (LCPA) has prepared an application to amend the Lee County Comprehensive Plan. This amendment is for additional non-aviation development on vacant property located north of the main terminal of Southwest Florida International Airport (RSW). The intent is to evaluate the impacts of the proposed development for a 20-year planning period.

2.0 BACKGROUND

Southwest Florida International Airport (RSW) is owned by Lee County and is operated by the Lee County Board of Port Commissioners (LCBPC) and provides access to the national and international air transportation system. The airport's service market is Southwest Florida, particularly greater Fort Myers, Sanibel Island, Captiva Island, Bonita Springs and Naples. RSW serves as an important element and resource in the Lee County and regional transportation systems.

The designator RSW was originally assigned for "Regional South-West" (for Southwest Florida Regional Airport). In 1993, the Lee County Port Authority renamed the airport as Southwest Florida International Airport. In 2009, total passengers numbered 7,415,958. The airport is one of the top 50 busiest for passenger traffic in the U.S and is also a U.S. Customs and Border Protection port of entry.

The Southwest Florida International Airport Master Plan was prepared which documents the planned expansion for the aviation uses at the Airport. In addition to the aviation uses and the specific lands dedicated for that purpose, the LCPA is planning to develop vacant property under its control for non-aviation uses. The non-aviation uses support the goal of ensuring financial self-sufficiency for the facility.

The Airport Master Plan is incorporated in the Lee County Comprehensive Plan. **Appendix A** shows the details of the planned Airport development schedule including the aviation and non-aviation land uses as adopted with proposed changes in strikeout and underline format. The development schedule up to year 2020 was approved in the comprehensive plan amendment by ordinance 04-16. This development schedule included approximately 100 acres for non-aviation land uses.

The proposed property designated as 'RSW North of Runway 6-24' is bounded by Daniels Parkway on the north, Treeline Avenue on the west, and proposed aviation land uses on the south. **Appendix B** shows the airport layout plan showing the land parcels and different land uses planned for RSW. Through this comprehensive plan amendment, 300 acres are proposed for non-aviation uses at this time. The comprehensive plan amendment approved by ordinance 04-16 included 100 acres for non-aviation land uses. The non-aviation land uses for the additional 200 acres will be subject to the current application for the comprehensive plan amendment.

3.0 RSW NON-AVIATION PROPOSED LAND USES

Table 3-1 below shows the additional non-aviation land uses proposed for the RSW from year 2020 to 2030. These proposed land uses are contained within an area of approximately 200 acres. **These land uses consist of approximately 893,000 square feet (SF)** of additional mixed-use development including light industrial, warehouse, office and retail and are **subject to the current application for comprehensive plan amendment.**

Table 3-1: RSW Non-Aviation Proposed Land Uses

RSW Non-Aviation Land Uses	2020-2030 (Proposed Size)¹
Retail and Service	248,750 SF ²
Gas Station/Convenience Store	5,000 SF
Hotel	187 Rooms
Light Manufacturing/Assembly	147,500 SF
Warehouse/Distribution	329,200 SF
Office	162,500 SF

1. See Table 5(A) in Appendix A

2. Includes 27,000 SF from Existing to 2020 and 221,750 SF from 2020 to 2030.

4.0 TRAFFIC ANALYSIS METHODOLOGY

The traffic analysis methodology for the RSW Comprehensive Plan Amendment is based on Lee County traffic study requirements. The primary analysis tool is the currently adopted Lee/Collier Counties Transportation Model. The model has base year data and roadway network for the year 2000. The model forecast year is 2030. The model incorporates 2030 socio-economic data and the 2030 Cost Feasible roadway network developed for the currently adopted Metropolitan Organization (MPO) Long Range Transportation Plan (LRTP). The limits of the transportation analysis were identified as 3 miles from the amendment area as required for comprehensive plan amendments. **Attachment 1** shows the study area roadway network map.

4.1 Analysis Period

The traffic circulation analysis will include the long range 20-year forecast approach only; there are no immediate development plans at this time that will warrant a short range CIP forecast. The roadway segment analysis for this study was completed using the 2030 Cost Feasible roadway network from the currently adopted Lee County MPO Long Range Transportation Plan.

4.2 Socio Economic Data

The socio-economic (SE) data for the proposed RSW development was estimated based on the land uses listed in Table 3-1 and assumed employment rates. **Table 4-1** below shows the SE data calculations for the RSW Non-Aviation land uses.

Table 4-1: RSW Non-Aviation Proposed Land Uses

RSW Non-Aviation Land Uses	2020-2030 (Proposed Size)	Rate (Employee/1000 SF)	SE Data (Employees/ Rooms)
Retail and Service	248,750 SF ¹	4.0	995
Gas Station/Convenience Store	5,000 SF	4.0	20
Hotel	187 Rooms	NA	187 Rooms
Light Manufacturing/Assembly	147,500 SF	1.5	221
Warehouse/Distribution	329,200 SF	1.5	494
Office	162,500 SF	2.5	406

1. Includes 27,000 SF from Existing to 2020 and 221,750 SF from 2020 to 2030.

The SE data for the RSW resulted in a total of 11,088 peak season weekday average daily traffic (PSWADT). This additional traffic was distributed manually on to the study area roadway network using the prevailing assignment patterns from the adopted 2030 Cost Feasible model. The proposed development was assumed to directly load on to Daniels Parkway.

4.3 Roadway Service Volumes

The roadway service volumes used for the segment analysis were obtained from 2009 FDOT and Lee County Generalized Peak Hour Directional Service Volumes for Urbanized Areas. The service volumes were based on the adopted level of service (LOS) standard of D for I-75 and LOS E for all the other roadways in the study area. **Table 4-2** provides a summary of service volumes for roadways in the 3-mile study area.

Table 4-2: Lee County Generalized Peak Hour Directional Service Volumes

Arterial Type	Directional Lanes	Peak Direction Service Volume	Study Area Arterials
Freeways (Uninterrupted Flow Highway)	3	5,580 ¹	I-75
Controlled Access Facilities	3	3,070 ²	Treeline Avenue
Arterial Class I	3	2,960 ²	Daniels Parkway
Collectors	2	1,830 ²	Treeline Ave, Gateway Boulevard and Commerce Lakes Drive
Collectors	1	860 ²	Gateway Boulevard, Griffin Drive, Commerce Lakes Drive, Westlinks Drive and Darlington Drive

1. Source: FDOT 2009 Generalized Volume Tables for LOS D

2. Source: Lee County 2009 Generalized Volume Tables for LOS E

4.4 Forecast Scenarios

The horizon year 2030 traffic forecasts were obtained from two scenarios developed for this study. The following is a summary of each modeling scenario:

1. Current adopted 2030 Cost Feasible Lee County Transportation Model – Used to establish the background growth in traffic for 20-year horizon. The 2030 Cost Feasible model includes the new airport interchange with I-75 between the existing I-75/Alico Road and I-75/Daniels Parkway interchanges.
2. 2030 Project Traffic – In this scenario the peak season weekday average daily traffic (PSWADT) generated from the proposed RSW Comprehensive Plan Amendment was manually added to the adopted 2030 Cost Feasible Model volumes using the prevailing assignment patterns from the adopted model.

4.5 Roadway Segment Analysis Methodology

The traffic forecasts obtained from the 2030 Cost Feasible Model were converted into peak season weekday average daily traffic (PSWADT). The link PSWADT was averaged to develop an average segment value. The PSWADT forecasts were multiplied by a county wide model output conversion factor (MOCF) of 0.88 to obtain annual average daily traffic (AADT). The AADT forecasts were then multiplied with K_{100} and D_{100} factors to obtain peak hour directional volumes. These volumes were then compared with the service volumes presented in **Table 4-2** to develop a volume over capacity (v/c) ratio for each roadway segment.

5.0 ROADWAY SEGMENT ANALYSIS

A roadway segment analysis was done by comparing the peak hour directional volume to the Lee County Generalized service volumes. A volume over capacity (v/c) ratio value was determined by dividing the link volume with service volumes.

5.1 2030 Cost Feasible Plan Adopted Model Volumes and v/c Ratios

Table 5-1 shows the roadway segment volumes and v/c ratio analysis results for the 2030 Cost Feasible adopted model scenario. The results of this analysis indicated major congestion on Daniels Parkway. The Peak Season Weekday Average Daily Traffic (PSWADT) values are multiplied with Model Output Conversion Factor (MOCF) to obtain Annual Average Daily Traffic (AADT). The AADT values are multiplied with K_{100} and D_{100} factors to obtain the peak hour directional volumes. The peak hour directional volumes are divided by the Lee County Generalized Service Volumes to obtain a v/c ratio value.

Table 5-1 below shows the development of peak hour directional volumes and volume to capacity (v/c) ratios. The v/c ratios greater than 1.0 represent congested links and are unacceptable; these locations are highlighted in the table below.

Table 5-1: 2030 Cost Feasible Plan-Adopted Model Traffic Analysis Summary

Road	From	To	2030 Cost Feasible Lanes	Model PSWADT	MOCF	AADT	K_{100} Factor	D_{100} Factor	Peak Hour Directional Volumes	Lee County Generalized Directional Service Volumes	v/c Ratio
Daniels Parkway	Palomino Ln	I-75	6	99,404	0.88	87,476	0.093	0.6	4,881	2960	1.65
	I-75	Treeline Ave	6	95,948	0.88	84,434	0.093	0.6	4,711	2960	1.59
	Treeline Ave	Chamberlin Pkwy W	6	87,352	0.88	76,870	0.107	0.64	5,264	2960	1.78
	Chamberlin Pkwy W	Project	6	65,711	0.88	57,826	0.107	0.64	3,960	2960	1.34
	Project	Westlinks Dr	6	65,711	0.88	57,826	0.107	0.64	3,960	2960	1.34
	Westlinks Dr	Gateway Blvd	6	60,952	0.88	53,638	0.107	0.64	3,673	2960	1.24
I-75	Gateway Blvd	SR 82	6	60,622	0.88	53,347	0.0951	0.64	3,247	2960	1.10
	Colonial Blvd	Daniels Pkwy	6	137,447	0.88	120,953	0.087	0.56	5,893	5580	1.06
	Daniels Pkwy	Terminal Access Rd	6	141,423	0.88	124,452	0.087	0.56	6,063	5580	1.09
Treeline Ave	Colonial Blvd	Darlington Dr	4	21,290	0.88	18,735	0.1	0.52	974	1830	0.53
	Darlington Dr	Daniels Pkwy	4	31,388	0.88	27,621	0.1	0.52	1,436	1830	0.78
	Daniels Pkwy	Terminal Access Rd	6	65,932	0.88	58,020	0.095	0.57	3,142	3070	1.02
Gateway Blvd	Daniels Pkwy	Griffin Dr	4	7,548	0.88	6,642	0.1	0.52	345	1830	0.19
	Griffin Dr	Commerce Lakes Dr	2	6,208	0.88	5,463	0.1	0.52	284	860	0.33
Griffin Dr	Gateway Blvd	SR 82	2	2,892	0.88	2,545	0.1	0.52	132	860	0.15
Commerce Lakes Dr	Gateway Blvd	Darlington Dr	4	22,374	0.88	19,689	0.1	0.52	1,024	1830	0.56
	Darlington Dr	Westlinks Dr	2	4,486	0.88	3,948	0.1	0.52	205	860	0.24
	Westlinks Dr	Gateway Blvd	2	1,452	0.88	1,278	0.1	0.52	66	860	0.08
Westlinks Dr	Commerce Lakes Dr	Daniels Pkwy	2	5,614	0.88	4,940	0.1	0.52	257	860	0.30
Darlington Dr	Treeline Ave	Commerce Lakes Dr	2	23,804	0.88	20,948	0.1	0.52	1,089	860	1.27

5.2 2030 Volumes and v/c Ratios with RSW Non-Aviation Uses

Table 5-2 shows the roadway segment volumes and v/c ratio analysis results for the proposed RSW Comprehensive Plan Amendment. A total of 11,088 vehicles per day during the peak season are estimated from the proposed development. This traffic is distributed onto study roadway segments using the prevailing assignment patterns from the adopted Cost Feasible model. The results of this analysis indicated major congestion on Daniels Parkway. **Table 5-2** below shows the development of peak hour directional volumes and volume to capacity (v/c) ratios for the roadway segments in the study area. The v/c ratios greater than 1.0 represent congested links and are unacceptable; these locations are highlighted in the table below.

Table 5-2: 2030 RSW Comprehensive Plan Amendment Traffic Analysis Summary

Road	From	To	2030 CF Lanes	RSW Comp Plan Amendment Model Distribution	Project PSWADT	Adopted 2030 Model PSWADT	Total 2030 PSWADT	MOCF	AADT	K100 Factor	D100 Factor	Peak Hour Directional Volume	Lee County Generalized Directional Service Volumes	v/c Ratio
Daniels Parkway	Palomino Ln	I-75	6	26%	2,883	99,404	102,287	0.88	90,012	0.093	0.6	5,023	2960	1.70
	I-75	Treeline Ave	6	41%	4,546	95,948	100,494	0.88	88,435	0.093	0.6	4,935	2960	1.67
	Treeline Ave	Chamberlin Pkwy W	6	62%	6,875	87,352	94,227	0.88	82,919	0.107	0.64	5,678	2960	1.92
	Chamberlin Pkwy W	Project*	6	69%	7,651	65,711	73,362	0.88	64,558	0.107	0.64	4,421	2960	1.49
	Project*	Westlinks Dr	6	31%	3,437	65,711	69,148	0.88	60,850	0.107	0.64	4,167	2960	1.41
	Westlinks Dr	Gateway Blvd	6	29%	3,216	60,952	64,168	0.88	56,467	0.107	0.64	3,867	2960	1.31
	Gateway Blvd	SR 82	6	20%	2,218	60,622	62,840	0.88	55,299	0.0951	0.64	3,366	2960	1.14
I-75	Colonial Blvd	Daniels Pkwy	6	10%	1,109	137,447	138,556	0.88	121,929	0.087	0.56	5,940	5580	1.06
	Daniels Pkwy	Terminal Access Rd	6	4%	444	141,423	141,867	0.88	124,843	0.087	0.56	6,082	5580	1.09
Treeline Ave	Colonial Blvd	Darlington Dr	4	7%	776	21,290	22,066	0.88	19,418	0.1	0.52	1,010	1830	0.55
	Darlington Dr	Daniels Pkwy	4	8%	887	31,388	32,275	0.88	28,402	0.1	0.52	1,477	1830	0.81
	Daniels Pkwy	Terminal Access Rd	6	12%	1,331	65,932	67,263	0.88	59,191	0.095	0.57	3,205	3070	1.04
Gateway Blvd	Daniels Pkwy	Griffin Dr	4	9%	998	7,548	8,546	0.88	7,520	0.1	0.52	391	1830	0.21
	Griffin Dr	Commerce Lakes Dr	2	6%	665	6,208	6,873	0.88	6,048	0.1	0.52	315	860	0.37
Griffin Dr	Gateway Blvd	SR 82	2	0%	0	2,892	2,892	0.88	2,545	0.1	0.52	132	860	0.15
Commerce Lakes Dr	Gateway Blvd	Darlington Dr	4	0%	0	22,374	22,374	0.88	19,689	0.1	0.52	1,024	1830	0.56
	Darlington Dr	Westlinks Dr	2	0%	0	4,486	4,486	0.88	3,948	0.1	0.52	205	860	0.24
	Westlinks Dr	Gateway Blvd	2	0%	0	1,452	1,452	0.88	1,278	0.1	0.52	66	860	0.08
Westlinks Dr	Commerce Lakes Dr	Daniels Pkwy	2	1%	111	5,614	5,725	0.88	5,038	0.1	0.52	262	860	0.30
Darlington Dr	Treeline Ave	Commerce Lakes Dr	2	0%	0	23,804	23,804	0.88	20,948	0.1	0.52	1,089	860	1.27

*Total RSW Comprehensive Plan Amendment project traffic adds to 7,651+3,437=11,088 PSWADT.

5.3 Summary

Table 5-3 shows the percentage difference and v/c ratios comparison between the 2030 Cost Feasible model and 2030 with RSW Comprehensive Plan Amendment volumes. The v/c ratio comparison shows that all of the links which have v/c ratios greater than 1.0 under the 2030 project traffic are the same links which have v/c ratio greater than 1.0 under the 2030 Cost Feasible model scenario. A thorough assessment of the currently adopted Lee/Collier Transportation Model revealed that a significant amount of population and employment growth is projected for the study area. RSW is also expected to experience robust growth and aviation related traffic generated from the airport is projected to increase. As a result, the model forecasts high levels of congestion on Daniels Parkway in the base scenario with v/c ratios ranging from 1.10 to 1.78. As expected, the addition of the RSW Comprehensive Plan Amendment land uses adds congestion to the Daniels Parkway corridor that is already experiencing unacceptable levels of congestion in 2030.

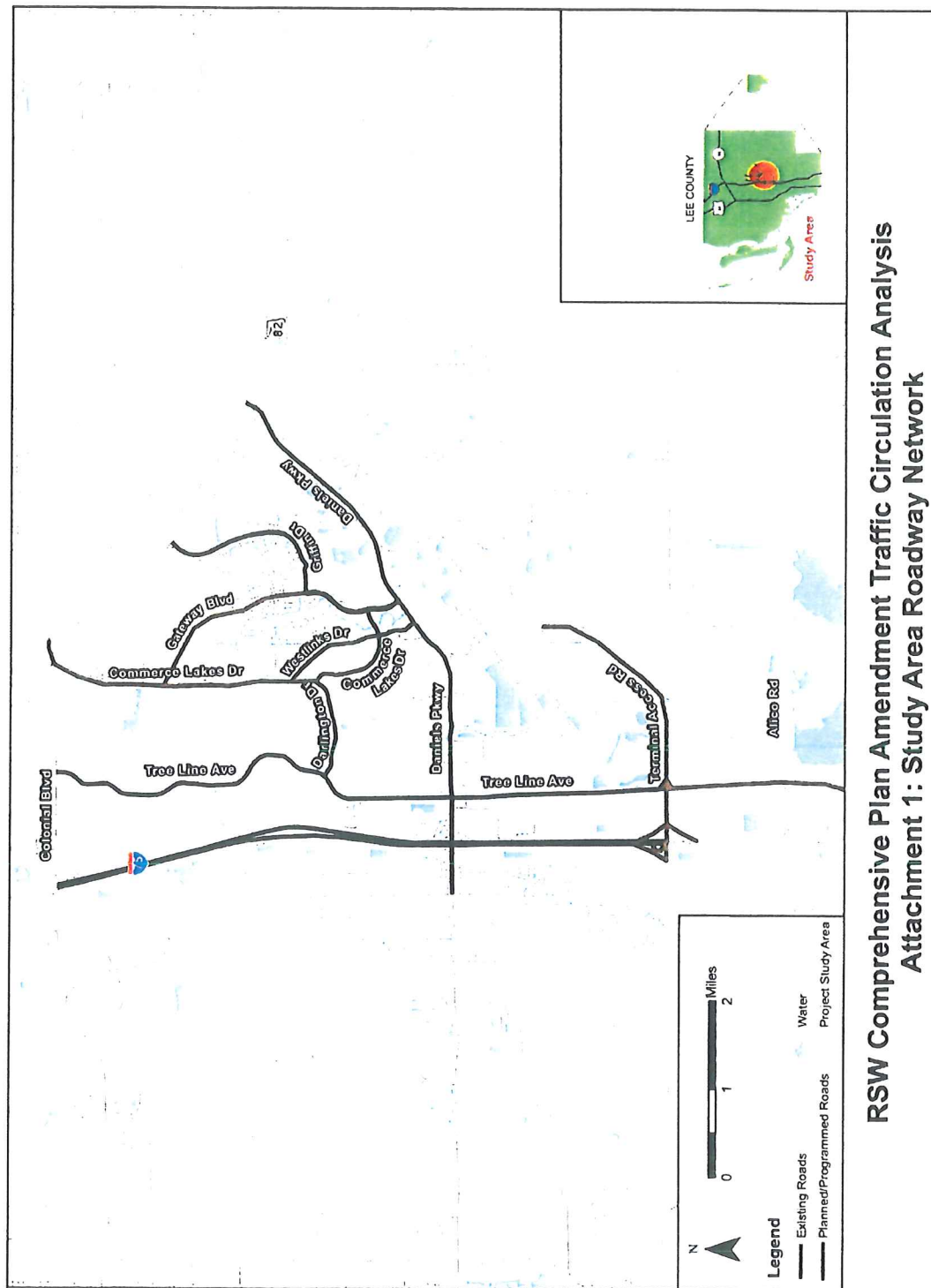
There are three links where increase in AADT volume due to the project traffic exceeds 10%; however two of these three links maintain a v/c ratio of less than 1.0. The link with v/c ratio higher than 1.0 and project traffic in excess of 10% is on Daniels Parkway and provides direct access to the project from the west. This link is already projected to operate over capacity in the 2030 base scenario.

All non-aviation development will be subject to Lee County guidelines to meet the concurrency requirements. This traffic study will provide guidelines for the congested roadway segments. However, when the proposed developments will need to be implemented, site specific traffic studies will be required for concurrency compliance to identify relevant impact fees at that time. The Lee County Port Authority will work closely with Lee County Transportation Planning, FDOT and other stakeholders to ensure that sufficient capacity is made available along the arterial roadway segments in the study area.

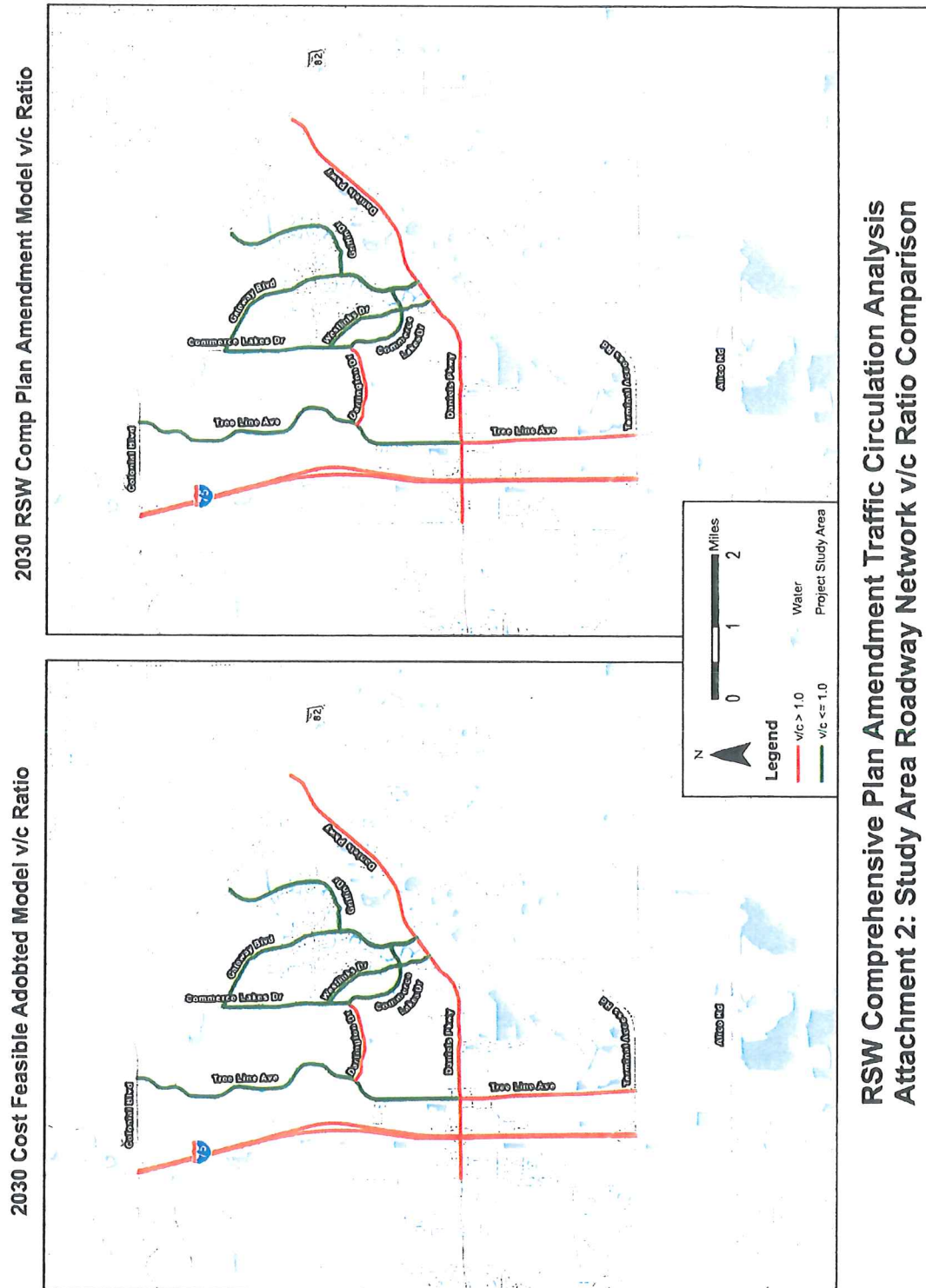
Table 5-3: 2030 Cost Feasible Plan Traffic & RSW Comprehensive Plan Amendment Traffic Comparison

Road	From	To	2030 Cost Feasible Model AADT	2030 RSW Comp Plan Amendment Model AADT	Additional Daily Traffic from RSW Non-Aviation Land Uses	% Difference	2030 Cost Feasible Model v/c Ratio	2030 RSW Comp Plan Amendment Model v/c Ratio
Daniels Parkway	Palomino Ln	I-75	87,476	90,012	2,537	2.9%	1.65	1.70
	I-75	Treeline Ave	84,434	88,435	4,001	4.7%	1.59	1.67
	Treeline Ave	Chamberlin Pkwy W	76,870	82,919	6,050	7.9%	1.78	1.92
	Chamberlin Pkwy W	Project	57,826	64,558	6,733	11.6%	1.34	1.49
	Project	Westlinks Dr	57,826	60,850	3,025	5.2%	1.34	1.41
	Westlinks Dr	Gateway Blvd	53,638	56,467	2,830	5.3%	1.24	1.31
I-75	Gateway Blvd	SR 82	53,347	55,299	1,951	3.7%	1.10	1.14
	Colonial Blvd	Daniels Pkwy	120,953	121,929	976	0.8%	1.06	1.06
Treeline Ave	Daniels Pkwy	Terminal Access Rd	124,452	124,843	390	0.3%	1.09	1.09
	Colonial Blvd	Darlington Dr	18,735	19,418	683	3.6%	0.53	0.55
	Darlington Dr	Daniels Pkwy	27,621	28,402	781	2.8%	0.78	0.81
Gateway Blvd	Daniels Pkwy	Terminal Access Rd	58,020	59,191	1,171	2.0%	1.02	1.04
	Daniels Pkwy	Griffin Dr	6,642	7,520	878	13.2%	0.19	0.21
Griffin Dr	Griffin Dr	Commerce Lakes Dr	5,463	6,048	585	10.7%	0.33	0.37
	Gateway Blvd	SR 82	2,545	2,545	0	0.0%	0.15	0.15
Commerce Lakes Dr	Gateway Blvd	Darlington Dr	19,689	19,689	0	0.0%	0.56	0.56
	Darlington Dr	Westlinks Dr	3,948	3,948	0	0.0%	0.24	0.24
	Westlinks Dr	Gateway Blvd	1,278	1,278	0	0.0%	0.08	0.08
Westlinks Dr	Commerce Lakes Dr	Daniels Pkwy	4,940	5,038	98	2.0%	0.30	0.30
Darlington Dr	Treeline Ave	Commerce Lakes Dr	20,948	20,948	0	0.0%	1.27	1.27

Attachment 1: Study Area Roadway Network



Attachment 2: Study Area Roadway Network v/c Ratio Comparison



Appendix A

Table 5(A) Southwest Florida International Airport Development Schedule

TABLE 5(A)
Southwest Florida International Airport Development Schedule

Development	Existing (200810)	Existing - 2020	2020 - 2030
LANDSIDE			
Midfield Terminal Complex	28 gates; 798,000 SF as-built	Expand from 28 gates to 47 gates; 1,278,900 SF (Total 2020 area)	
Auto Access	Entrances at the intersections of Daniels Parkway at Chamberlin Parkway, Paul J. Doherty Parkway, and Fuel Farm Road (located east of Doherty Parkway). Access also from Daniels via Treeline Ave. & Alico Road via Ben Hill Griffin Parkway to Terminal Access Road. Air Cargo Lane improvements from Chamberlin Pkwy. - including a realigned Perimeter Road segment allowing freight transfer within the security fenced, airside/aviation area.	Rehab perimeter service and fuel farm roads. Expand Terminal Access Road entrance to 6 lanes. Construct 1-75 access. Connector road for maintenance facilities. New perimeter roads and midfield ATCT and ARFF access roads as part of parallel runway project. Miscellaneous roadway improvements.	
Airport maintenance and Vehicle Maintenance Shop	23,000 SF	Add 6,800 SF to vehicle shop (Total maintenance area 29,800 SF)	
Parking	14,399 total existing spaces		
Passenger	11,461 spaces		
- Hourly	2,519 spaces	Ultimately 5,126 total hourly spaces	
- Daily	8,942 spaces	Ultimately 9,342 total daily spaces	
Employee	1,288 spaces	Total 2,088 employee spaces in 2020	
Taxi/Limo/Toll Booth	150 spaces	Ultimately 200 total Taxi/Limo/spaces	
Rental Cars	1,500 spaces in midfield	Ultimately 3,000 total rental car spaces	
Cell Phone Lot	100 spaces		
Airport Training & Conference Center	16,000 SF		
Gun Range	8,500 SF		
Rental Car North Side Service Areas	39,000 SF	Relocate R-A-C service areas to midfield	
AIRSIDE			
Existing Runway 6-24	12,000 ft. x 150 ft. runway	No improvements planned	
Parallel Runway 6R-24L	Under design	Construct 9,100 x 150 ft. Parallel Runway 6R-24L	
Taxiways	Taxiway A-parallel taxiway to Runway 6-24: 12,000 ft. long x 75 ft. wide. Taxiway B-apron taxiway that runs parallel to former terminal ramp for transitioning aircraft going from ramp to Taxiway A for approximately 1,580 ft. 12,000' parallel S. Taxiway F as-built with midfield construction.	Construct parallel taxiway north of Runway 6R-24L (9,100 ft. x 75 ft. wide). If new large Aircraft (NLA), then 100 ft. wide. Hold bay & bypass improvements to Runway 6L-24R parallel taxiway. Construct dual cross-field connector taxiways. (Approx. 4,215 ft. long x 75 ft. wide). If NLA, then 100 ft. wide. Construct a portion of south dual parallel taxiways with new parallel runway.	
Terminal Apron	165,000 S.Y. at former terminal site; 332,900 S.Y. at midfield as-built	Add 130,000 S.Y. at midfield for total midfield 462,900 S.Y.	
Air Cargo	Total 39,500 SF cargo buildings; 69,000 S.Y. apron area	Expand cargo building facilities to 58,314 SF	
Airline Freight Forwarding (Belly Cargo)	15,000 SF	New freight forwarding (belly cargo) facility of 15,000 SF in midfield area.	

Development	Existing (200810)	Existing - 2020		2020 - 2030
General Aviation	8,000 SF FBO and hangar facility; 26,180 SF hangar space; 48,650 S.Y. apron area	Infrastructure for second FBO. Construct multi-use hangars (129,000 SF). Expand GA apron to 49,700 S.Y.		
Aircraft Maintenance - General Aviation & Large Aircraft	Approximately 13,000 SF	Expand to 36,000 SF as necessary. Construct one hangar to accommodate aircraft including the Boeing 747. Land to accommodate an additional three hangars should be set aside, should it be needed in the future.		
Air Traffic Control Tower (ATCT)	Height 76.91 ft., 8,600 SF	Relocate to midfield - same SF as existing 8,600 ft. or more. New height must be greater than 80 ft. AGL		
Aircraft Rescue and Fire Fighting (ARFF)	14,000 SF	Add midfield ARFF Station		
Fuel Farm	Commercial: Four (4) 420,000 gallon tanks Jet A. Fuel pumped from existing fuel farm area by a hydrant fueling system to the midfield area. General Aviation: Four (4) 15,000 gallon Jet A tanks. One (1) 12,000 gallon 100LL tank.			
Airline Catering	25,000 SF			
Miscellaneous		Relocate high voltage power lines. Upgrade airfield emergency generator. Helipad (11,000 SF). Develop multi-modal center.		
Rental Car Expansion		Rental car fuel farm.		
Non-Aviation Related Land Uses		Option 1	Option 2	
North of Runway 6-24				
Commercial Retail, Restaurant and Service		27,000 SF	27,000 SF	221,750 SF
Gas station/convenience store				5,000 SF w/ 24 pumps
Hotel				187 rooms
Light Manufacturing/Assembly		44,300 SF	100,000 SF	147,500 SF
Warehouse/Distrbution		100,000 SF	60,800 SF	329,200 SF
Office (This development includes 10% retail.)		275,000 SF	275,000 SF	162,500 SF
Midfield Area				
Commercial Retail, Restaurant and Service		40,000 SF	40,000 SF	
Animal Kennel and Clinic				
Hotel		Construct 300 Rooms	Construct 300 Rooms	
Gas Station/Convenience Store		Construct 3,500 SF w/24 pumps	Construct 3,500 SF w/24 pumps	

1. This table is for general phasing and major development items only. More specific details is available in the annual Capital Improvement Plan (CIP) prepared by the Lee County Port Authority for the Southwest Florida International Airport.

2. All non-aviation related development will meet local land development code requirements such as open space requirements listed in LDC Sec. 10-415 and Wetland impacts requirements listed in LDC Sec. 14-293. All development will be required to undergo local site and zoning review prior to local development order issuance. This Development includes 10% retail.

3. Development within the "Potential Future Development Area" will require amendment of the Lee Plan prior to development.

Appendix B

Southwest Florida International Airport Layout Plan

Exhibit IV.B.2.a & b
Potable Water and Sanitary Sewer Analysis
for
RSW Comprehensive Plan Amendment

WATER

Existing Conditions

Presently Lee County Utilities owns two (2) 16-inch water mains that have been installed parallel along Daniels Parkway from Chamberlain Parkway to Gateway Boulevard. In addition an existing 16-inch water main serves the airport that is directed south and east along Chamberlain Parkway. Per Lee County Utilities staff, an additional 30-inch water main is directed from the Green Meadows Water Treatment Plant and serves the Airport from the south side. And a 16-inch water main is directed south along Fuel Farm Road from Daniels Parkway.

Plant Capacity

The Green Meadows Water Treatment Plant serves the Southwest International Airport along with the immediate area around the airport. Presently this plant is designed for 9 Million Gallons per Day (MGD) of production. Per the Lee County Concurrency Report (2009), the projected Peak Month Daily usage is approximately 6.8 MGD. Therefore, there is an estimated surplus capacity of 2.2 MGD. As mentioned in the FY 09/10 CIP as included in the Lee Plan an expansion of this Water Treatment Plant (to 16 MGD) is set for fiscal year 2012/13. However, recently the scope of the expansion has been reduced. On 12/14/10 the Lee County BOCC adopted the approved FY 10/11 CIP into the Lee Plan. The newly adopted CIP still includes a project for the expansion of capacity at the Green Meadows WTP scheduled for FY 12/13; however the expansion is to a capacity of 10.0 MGD.

The existing South Florida Water Management District (SFWMD) consumptive water use permit #36-00003-W (which covers the Olga, Green Meadows and Corkscrew plants) states that the permitted allocation is 30.37 MGD of raw water during a maximum month. Per the Lee County Concurrency Report, a total of 18.95 MGD of finished water was actually produced by the three water treatment plants during 2008.

Future Conditions

For this project, the ideal connection points would be along Daniels Parkway. The dual 16-inch water mains allow for the greatest reliability and are the most economically feasible. It is recommended to loop the 16-inch water main from Chamberlain Parkway to Fuel Farm Road to further allow for redundancy and reliability. If a loop was installed, connections could be made at any point along the loop.

A recent fire flow test near the Airside Loop Road (along Daniels Parkway) shows an

available fire flow of approximately 6,100 gallons per minute at 20 psi residual. It appears there is plenty of capacity within these mains for some future development.

The Proposed Water and Wastewater Flows for this project are derived from the Development Schedule, Table 5(A). The Factors shown within Table 1 are provided from the Florida Administrative Code Chapter 64E-6.

Table 1: Proposed Water and Wastewater Flows

TOTAL through 2030 using Option 1 or 2						
Unit Type	Units	Factor (GPD/Unit)	Average Daily Flow Gallons per Day	Average Daily Flow Gallons per Minute	Peak Factor	Peak Day Flow Gallons per Minute
Commercial, Retail, Restaurant and Service (square feet)	248,750	0.15	37,313	26	4	104
Gas Station (square feet)	5,000	0.15	750	1	4	2
Hotel (rooms)	187	100	18,700	13	4	52
Light Manufacturing/Assembly (square feet)	147,500	0.15	22,125	15	4	61
Warehouse (square feet)	329,200	0.15	49,380	34	4	137
Office (square feet)	162,500	0.15	24,375	17	4	68
TOTAL			152,643	106		424

Minimum Level of Service

As stated within "The Lee Plan," (Policy 95.1.3)

Minimum Acceptable Level of Service (LOS):

Within certificated, franchised, or designated service areas only: supply and treatment capacity of 250 gallons per day per Equivalent Residential Connection (ERC) for the peak month, except that facilities serving only mobile home residential structures must have a capacity of 187.5 gallons per day, and facilities serving only travel trailer residential structures must have a capacity of 150 gallons per day. Where a private water utility has provided an alternate standard for application within its certificated or franchised area, and that standard has been adopted into this comprehensive plan, that will be the standard to be used for concurrency management in the respective certificated or franchised area.

Presently if the County meets the minimum LOS for the Green Meadows Water Treatment Plant, there is a surplus of 8,800 ERC's of additional flow based on 2.2 MGD of available capacity. After the expansion to 10 MGD there will be a total of 40,000 ERC's allowed or a total surplus of 12,800 ERC's. Per the 'Bureau of Economic Business Research' Lee County is projected to grow by approximately 50% by 2030 in population.

The anticipated 155,000 GPD for this project adds approximately 620 ERC to the treatment facility. It appears that the present plant capacity along with the future plant expansion should be able to accommodate this project. In addition it appears that Lee County's schedule for the plant expansion will sustain the LOS required by the Lee Plan.

SANITARY SEWER

Existing Conditions

Presently the Port Authority owns the gravity sewer system that leads to the old and new terminals for the Southwest Florida International Airport. Two lift stations from the gravity system direct wastewater from the Airport to a master pump station located approximately one mile due west of the existing terminal, just west of Chamberlain Parkway. Presently this lift station discharges wastewater into the Lee County owned 10-inch force main along Chamberlain Parkway and is directed to the west underneath Interstate 75 and on to the City of Fort Myers Wastewater Treatment Plant. In addition along Chamberlain Parkway there is a "dryline" 12-inch force main that connects the 10-inch force main to a 24-inch force main (also owned by Lee County) along the south side of Daniels Parkway. The 24-inch force main, also a "dryline," is then directed to the Gateway Wastewater Treatment Plant (GWWTWP) approximately 3.5 miles east of Chamberlain Parkway.

Future Conditions

The GWWTWP has completed the construction of tripling the treatment capacity from 1 Million Gallons per Day (MGD) to 3 MGD. Lee County Utilities staff has mentioned the plant does have the ability to expand the GWWTWP to 4 MGD and then ultimately to 6 MGD. However, presently, there are currently no plans to expand this facility beyond its current capacity.

Presently Lee County is in the process of providing a force main interconnect with the wastewater system to the west of Interstate 75 to the system near Chamberlain Parkway. This will create the ability for Lee County to send more wastewater to the GWWTWP.

If this project were to send flow to the east it would need to manifold with the Red Sox Spring Training facility and be directed directly to the GWWTWP. The approved Red Sox DRI mentions this facility will produce 0.113 MGD of average daily flow. This would leave 1.887 MGD for this project (the other 1 MGD of capacity is used by Gateway, as it is today). Therefore it is recommended to send wastewater to the GWWTWP. All of the wastewater that is presently directed to the west can still be directed that way. Presently, this would leave 1.887 MGD of capacity for this project.

The total wastewater treatment capacity needed for this project is proposed to be approximately 155,000 gallons per day (as shown within Table 1). The estimated surplus treatment capacity of 1.887 MGD will be reduced to a surplus of 1.732 MGD. The ideal connection points would be along Daniels Parkway. The 24-inch force main is on the south side of the road, therefore no roads would be affected during installation.

If Lee County wishes to send more wastewater to the GWWTWP additional analysis would need to take place in order to coordinate timing of the treatment facility

expansion.

Minimum Level of Service

As stated within "The Lee Plan," (Policy 95.1.3)

Minimum Acceptable Level of Service:

Within certificated, franchised, or designated service areas only: average treatment and disposal capacity of 200 gallons per day per Equivalent Residential Connection (ERC) for the peak month, except that facilities serving only mobile home residential structures must have a capacity of 150 gallons per day, and facilities serving only travel trailer residential structures must have a capacity of 120 gallons per day. Where a private sewer utility has provided an alternate standard for application within its certificated or franchised area, and that standard has been adopted into this comprehensive plan, that will be the standard to be used for concurrency management in the respective certificated or franchised area.

Presently if the County meets the minimum LOS with the 1 MGD for the Gateway Wastewater Treatment Plant, there are 5,000 ERC's allowed. Since the expansion to 3 MGD was recently finalized there is now a total of 15,000 ERC's allowed. This is over 100% increase in the amount of treatment capacity and ERC's. Per the 'Bureau of Economic Business Research' Lee County is projected to grow by approximately 50% by 2030 in population.

The anticipated 155,000 GPD for this project adds approximately 620 ERC to the treatment facility. It appears that the completed plant expansion should be able to accommodate this project, future growth and sustain the LOS required by the Lee Plan through 2030.

RECLAIMED WATER

Reclaimed water may become available in the future from the Gateway Wastewater Treatment Plant. Presently, approximately 20% of the Gateway service area uses reclaimed water for irrigation. This is due to the lack of reuse water availability. After the GWWTP expansion is finalized and more wastewater is sent to the plant, there may be a possibility of providing reclaimed water to parcels outside of Gateway.

To prepare for the potential that adequate reclaimed water supply is available in the future, new utility corridors or rights-of-way developed in the Airport's northern non-aviation lands will include a reserved alignment for future reclaimed water lines. This will allow connection to the system if a reclaimed water main is constructed along Daniels Parkway in the future.

Exhibit IV.B.2.c
Surface Water/Drainage
Existing and Future Conditions Analysis
for
RSW Comprehensive Plan Amendment

Existing Conditions

The portion of the property north of the existing runway is a mixture of developed and undeveloped lands. The developed portions have some buildings, roads, several large parking lots and borrow pits that are now part of the storm water detention system. The undeveloped lands are primarily upland and wetland areas that are outside the current area of use. The vegetative cover is shown in the FLUCFCS Map included in this application as Exhibit IV.C.1.

Water east of Paul J. Doughty Parkway generally flows south and east and joins water that is southeast of the runway. It can then either flow southerly through culverts in the Florida Power and Light access road or flow west through the existing onsite storm water system with discharge at the southwest corner of the property. Some water can flow west under the Parkway and runoff west of the Parkway flows overland and through borrow pits, crosses Chamberlin Parkway through culverts and then sheet flows west to be discharged through structures into the collector ditch along the east side of Treeline Avenue. It normally flows west across two control structures from the site. There is a structure in the collector channel that would allow water to flow south and be discharged to the South Conveyance Channel and join the other runoff from the property. This structure is normally closed and precludes this flow option.

Future Conditions

The proposed development shall meet the applicable State and Federal standards at the time of development.

Exhibit IV.B.2.d.
Parks, Recreation and Open Space
for
RSW Comprehensive Plan Amendment

Parks and Recreation

Policy 95.1.3 establishes the minimum level of service standards for regional parks and community parks. It also establishes non-regulatory standards for community recreation centers, boat ramps, water (beach) accesses. These level of service standards ensure resources are provided per the County population.

The application for comprehensive plan amendment to allow additional non-aviation development within non-aviation designated lands at SWFIA and does not include any residential development. Therefore the proposed comprehensive plan amendment will not impact the provision of parks and recreation facilities.

Open Space

Development plans must incorporate open space through the rezoning and development order permitting process. The future development in the non-aviation land areas will adhere to open space standards. The areas within the Airport property that are designated Wetlands on the Future Land Use Map will remain designated as Wetlands and be protected as open space. The provision of open space is ensured by the language included as Note 2 in Table 5(a) which reads:

“All non-aviation related development will meet local land development code requirements such as open space requirements listed in LDC Sec. 10-415 and Wetland impacts requirements listed in LDC Sec. 14-293. All development will be required to undergo local site and zoning review prior to local development order issuance.”

Exhibit IV.B.2.e.
Public Schools
for
RSW Comprehensive Plan Amendment

Public Schools

Policy 95.1.3 establishes the minimum level of service standards for public school facilities. These level of service standards ensure school capacity is available per student population.

The application for comprehensive plan amendment to allow additional non-aviation development within non-aviation designated lands at SWFIA and does not include any residential development. Therefore the proposed comprehensive plan amendment will not impact the capacity of public schools.



LEE COUNTY
SOUTHWEST FLORIDA

September 14, 2010

BOARD OF COUNTY COMMISSIONERS

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District Two

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Tammy Hall
District Four

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Karen B. Hawes
County Manager

David M. Owen
County Attorney

Diana M. Parker
County Hearing
Examiner

Ms. Debi Pendlebury
Johnson Engineering, Inc.
2122 Johnson St
P.O. Box 1550
Fort Myers, FL 33902

**Re: RSW Comprehensive Plan Amendment – Written Determination of
Service Availability**

Ms. Pendlebury:

Lee County Transit received your letter dated August 20, 2010 in reference to the RSW Comprehensive Plan Amendment for the Lee County Port Authority. Lee County does not currently provide public transportation services directly to the Skyplex parcels. The nearest existing service is via LeeTran Route 50 at Treeline Avenue and Daniels Parkway, approximately 1.42 miles southwest of the Daniels Parkway and Paul J Doherty Parkway intersection.

Planning studies have not identified the need to extend local bus service closer to the subject site anytime within the existing Lee County Transit Development Plan (TDP), a strategic plan for transit services which has a horizon through 2019. The TDP recommends improved service on Route 50 in the form of improved headway and shorter wait times only. Providing service to the subject location would require a realignment of this route or the addition of a new route, as well as a change to the strategic plan. Local and/or private funding for new services in the future has not been identified and would need to be addressed should transit service be required to the Skyplex parcels.

The Lee County Long Range Transportation Plan, which has a planning horizon through 2030, also does not indicate any future long-range changes in transit service through this section of the County.

If you have any questions please contact me at (239) 533-0333 or you can send an e-mail to mhorsting@leegov.com.

Sincerely,

Michael Horsting, AICP
Principal Planner
Lee County Transit



August 20, 2010

Mr. Michael Horsting
Lee County Transit Division
Post Office Box 398
Fort Myers, Florida 33902-0398

Re: RSW Comprehensive Plan Amendment
Request for Letter of Service Availability

Dear Mr. Horsting:

We are in the process of preparing an application for a Comprehensive Plan Amendment for Lee County Port Authority for Southwest Florida International Airport. The Southwest Florida International Airport (RSW) property comprises approximately 6,367 acres within the Gateway/Airport Planning Community. The following is a summary of the requested text changes requested within the subject application:

- Amend Lee Plan Policy 1.2.7 to reflect additional acreage allowed for non-aviation development.
Change the limit of allowable non-aviation development area North of Runway 6-24 from 100 acres to 300 acres, an additional 200 acres.
- Amend Lee Plan Policy 47.3.4 to indicate that non-aviation uses are scheduled through 2030 in Development Schedule Table 5(a).
The proposed development schedule for the Southwest Florida International Airport is amended to reflect through the year 2030 for non aviation uses.
- Amend Development Schedule Table 5(a) in order to reflect additional square feet of development in the non-aviation area North of Runway 6-24.

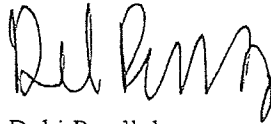
<u>North of Runway 6-24</u>	
Commercial Retail, Restaurant and Service	<u>221,750 SF</u>
Gas station/convenience store	<u>5,000 SF w/ 24 pumps</u>
Hotel	<u>187 rooms</u>
Light Manufacturing/Assembly	<u>147,500 SF</u>
Warehouse/Distribution	<u>329,200 SF</u>
Office (This development includes 10% retail.)	<u>162,500 SF</u>

The application requires we obtain a Letter of Service Availability from all providers, which must be filed with the application package. If you could please provide us with a letter of availability for your service at your earliest convenience, we would greatly appreciate it.

We appreciate your attention to this matter. If you have any questions, or require additional information, please do not hesitate to contact me at (239) 334-0046.

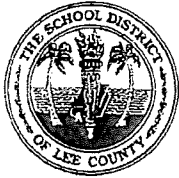
Sincerely,

JOHNSON ENGINEERING, INC.

A handwritten signature in black ink, appearing to read 'Debi Pendlebury', written in a cursive style.

Debi Pendlebury
Principal Planner

dlp/20087500



THE SCHOOL DISTRICT OF LEE COUNTY

2855 COLONIAL BLVD. ♦ FORT MYERS, FLORIDA 33966-1012 ♦ (239) 334-1102 ♦ WWW.LEESCHOOLS.NET

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CHAIRMAN, DISTRICT 4
ELINOR C. SCRICCA, PH.D.
VICE CHAIRMAN, DISTRICT 5

DISTRICT 1

JEANNE S. DOZIER
DISTRICT 2

JANE E. KUCKEL, PH.D.
DISTRICT 3

JAMES W. BROWDER, ED.D.
SUPERINTENDENT

KEITH B. MARTIN, ESQ.
BOARD ATTORNEY

September 3, 2010

Ms. Debi Pendlebury
Johnson Engineering, Inc.
2122 Johnson St. P.O. Box 1550
Fort Myers, FL 33902-1550

**Re: RSW Comprehensive Plan Amendment
Request for Letter of Service Availability**

Dear Ms. Williams:

We have received and reviewed your materials for the proposal to change the allowable non-aviation development area from 100 acres to 300 acres. We find that this non-residential use would have no impact on classroom needs in the school district and therefore, having no opposition to the amendment.

Thank you for your attention to this issue. If I may be of further assistance, please call me at (239) 479-5661.

Sincerely,

Dawn Huff, Community Development Planner
Planning Department



August 20, 2010

Dr. James W. Browder, Ed.D
Superintendent of Schools
Lee County School District
Lee County Public Education Center
2855 Colonial Boulevard
Fort Myers, Florida 33966

Re: RSW Comprehensive Plan Amendment
Request for Letter of Service Availability

Dear Dr. Browder:

We are in the process of preparing an application for a Comprehensive Plan Amendment for Lee County Port Authority for Southwest Florida International Airport. The Southwest Florida International Airport (RSW) property comprises approximately 6,367 acres within the Gateway/Airport Planning Community. The following is a summary of the requested text changes requested within the subject application:

- Amend Lee Plan Policy 1.2.7 to reflect additional acreage allowed for non-aviation development.
Change the limit of allowable non-aviation development area North of Runway 6-24 from 100 acres to 300 acres, an additional 200 acres.
- Amend Lee Plan Policy 47.3.4 to indicate that non-aviation uses are scheduled through 2030 in Development Schedule Table 5(a).
The proposed development schedule for the Southwest Florida International Airport is amended to reflect through the year 2030 for non aviation uses.
- Amend Development Schedule Table 5(a) in order to reflect additional square feet of development in the non-aviation area North of Runway 6-24.

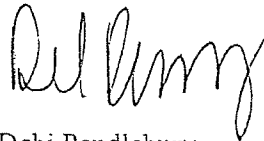
North of Runway 6-24	
Commercial Retail, Restaurant and Service	<u>221,750 SF</u>
Gas station/convenience store	<u>5,000 SF w/ 24 pumps</u>
Hotel	<u>187 rooms</u>
Light Manufacturing/Assembly	<u>147,500 SF</u>
Warehouse/Distribution	<u>329,200 SF</u>
Office (This development includes 10% retail.)	<u>162,500 SF</u>

The application requires we obtain a Letter of Service Availability from all providers, which must be filed with the application package. This particular amendment application will have no effect on the Lee County public school system, because there is no new residential associated with the request. We are still required to request a letter from you indicating this, rather than a letter stating the availability of local classrooms. If you could please provide us with this letter at your earliest convenience, we would greatly appreciate it.

We appreciate your attention to this matter. If you have any questions, or require additional information, please do not hesitate to contact me at (239) 334-0046.

Sincerely,

JOHNSON ENGINEERING, INC.

A handwritten signature in black ink, appearing to read 'Debi Pendlebury', written in a cursive style.

Debi Pendlebury
Principal Planner

dlp/20087500



(239) 590-4771

Direct Dial:

Fax:

(239) 590-4795

ROBERT M. BALL, A.A.E.
EXECUTIVE DIRECTOR

DAVID W. OWEN
PORT AUTHORITY ATTORNEY

September 1, 2010

**BOARD OF
PORT COMMISSIONERS**

A. BRIAN BIGELOW

TAMMY HALL

BOB JAMES

RAY JUDAH

FRANK MANN

Ms. Debi Pendlebury
Principal Planner
Johnson Engineering
2122 Johnson Street
PO Box 1550
Fort Myers, FL 33902-1550

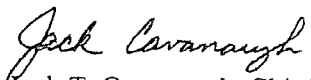
Dear Ms. Pendlebury:

We have been requested by your office to comment on the adequacy of providing law enforcement services at the Southwest Florida International Airport. As you may know, the Lee County Port Authority provides its own law enforcement at both the Southwest Florida International Airport and the Page Field Airport. It is anticipated that we will continue to provide law enforcement services without interruption.

Also, please update your records as Richard Severson retired last year. If you require any further comment, feel free to contact me.

Sincerely,

LEE COUNTY PORT AUTHORITY


Jack T. Cavanaugh, Chief of Police
Airport Police & Security

JTC:het
0026L-10/GC.150.a



August 20, 2010

Chief Richard Severson
Lee County Port Authority Police
11000 Terminal Access Road
Suite 8671
Fort Myers, Florida 33913

Re: RSW Comprehensive Plan Amendment
Request for Letter of Service Availability

Dear Chief Severson:

We are in the process of preparing an application for a Comprehensive Plan Amendment for Lee County Port Authority for Southwest Florida International Airport. The Southwest Florida International Airport (RSW) property comprises approximately 6,367 acres within the Gateway/Airport Planning Community. The following is a summary of the requested text changes requested within the subject application:

- Amend Lee Plan Policy 1.2.7 to reflect additional acreage allowed for non-aviation development.
Change the limit of allowable non-aviation development area North of Runway 6-24 from 100 acres to 300 acres, an additional 200 acres.
- Amend Lee Plan Policy 47.3.4 to indicate that non-aviation uses are scheduled through 2030 in Development Schedule Table 5(a).
The proposed development schedule for the Southwest Florida International Airport is amended to reflect through the year 2030 for non aviation uses.
- Amend Development Schedule Table 5(a) in order to reflect additional square feet of development in the non-aviation area North of Runway 6-24.

<u>North of Runway 6-24</u>	
Commercial Retail, Restaurant and Service	<u>221,750 SF</u>
Gas station/convenience store	<u>5,000 SF w/ 24 pumps</u>
Hotel	<u>187 rooms</u>
Light Manufacturing/Assembly	<u>147,500 SF</u>
Warehouse/Distribution	<u>329,200 SF</u>
Office (This development includes 10% retail.)	<u>162,500 SF</u>

The application requires we obtain a Letter of Service Availability from all providers, which must be filed with the application package. If you could please provide us with a letter of availability for your service at your earliest convenience, we would greatly appreciate it.

We appreciate your attention to this matter. If you have any questions, or require additional information, please do not hesitate to contact me at (239) 334-0046.

Sincerely,

JOHNSON ENGINEERING, INC.

A handwritten signature in black ink, appearing to read "Debi Pendlebury". The signature is fluid and cursive, with the first name "Debi" being more prominent.

Debi Pendlebury
Principal Planner

dlp/20087500



August 20, 2010

Ms. Kim Dickerson, EMT-P, RN. MBA
EMS Operations Chief
LC Emergency Medical Services
14752 Ben Pratt/Six Mile Cypress
Fort Myers, Florida 33912

Re: RSW Comprehensive Plan Amendment
Request for Letter of Service Availability

Dear Ms. Dickerson:

We are in the process of preparing an application for a Comprehensive Plan Amendment for Lee County Port Authority for Southwest Florida International Airport. The Southwest Florida International Airport (RSW) property comprises approximately 6,367 acres within the Gateway/Airport Planning Community. The following is a summary of the requested text changes requested within the subject application:

- Amend Lee Plan Policy 1.2.7 to reflect additional acreage allowed for non-aviation development.
Change the limit of allowable non-aviation development area North of Runway 6-24 from 100 acres to 300 acres, an additional 200 acres.
- Amend Lee Plan Policy 47.3.4 to indicate that non-aviation uses are scheduled through 2030 in Development Schedule Table 5(a).
The proposed development schedule for the Southwest Florida International Airport is amended to reflect through the year 2030 for non aviation uses.
- Amend Development Schedule Table 5(a) in order to reflect additional square feet of development in the non-aviation area North of Runway 6-24.

<u>North of Runway 6-24</u>	
Commercial Retail, Restaurant and Service	<u>221,750 SF</u>
Gas station/convenience store	<u>5,000 SF w/ 24 pumps</u>
Hotel	<u>187 rooms</u>
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Warehouse/Distribution	<u>329,200 SF</u>
Office (This development includes 10% retail.)	<u>162,500 SF</u>

The application requires we obtain a Letter of Service Availability from all providers, which must be filed with the application package. If you could please provide us with a letter of availability for your service at your earliest convenience, we would greatly appreciate it.

We appreciate your attention to this matter. If you have any questions, or require additional information, please do not hesitate to contact me at (239) 334-0046.

Sincerely,

JOHNSON ENGINEERING, INC.

A handwritten signature in black ink, appearing to read 'Debi Pendlebury', written in a cursive style.

Debi Pendlebury
Principal Planner

dlp/20087500



John E. Manning
District One

Brian Bigelow
District Two

Ray Judah
District Three

Tammy Hall
District Four

Frank Mann
District Five

Karen B. Hawes
County Manager

Michael D. Hunt
County Attorney

Diana M. Parker
County Hearing Examiner

May 10, 2011

Ms. Debi Pendlebury
Principal Planner
Johnson Engineering
2122 Johnson Street
P.O. Box 1550
Fort Myers, FL 33902

Dear Ms. Pendlebury,

This letter is to verify that Lee County Emergency Medical Services does provide basic and advanced life support ambulance coverage and service to Southwest Florida International Airport.

Please contact me at 239-533-3911 or email STuttle@leegov.com if you should need further information.

Thank you.

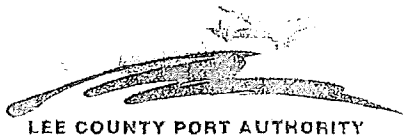
Respectfully,

LEE COUNTY DIVISION OF PUBLIC SAFETY
Emergency Medical Services

A handwritten signature in black ink, appearing to be "S Tuttle", written over a horizontal line.

Chief Scott Tuttle
EMS Operations Manager

ST/tm



Direct Dial: (239) 590-4566

Fax: (239) 768-4482

September 1, 2010

ROBERT M. BALL, A.A.E.
EXECUTIVE DIRECTOR

DAVID M. OWEN
PORT AUTHORITY ATTORNEY

Debi Pendlebury, Principal Planner
Johnson Engineering
P. O. Box 1550
Fort Myers, FL 33902-1550

BOARD OF
PORT COMMISSIONERS

A. BRIAN BIGELOW

TAMMY HALL

BOB JAMES

RAY JUDAH

FRANK MANH

Re: RSW Comprehensive Plan Amendment
Request for Letter of Service Availability

Dear Ms. Pendlebury:

In response to your letter dated August 20, 2010, please be advised that the Lee County Port Authority Aircraft Rescue and Fire Fighting (ARFF) will continue providing fire and rescue services to the Southwest Florida International Airport (RSW) property which is comprised of approximately 6,367 acres within the Gateway/Airport Planning Community.

The ARFF department provides all fire protection and non-ambulance medical services to the RSW property. Fire Station 92, located on airport property, is fully staffed and equipped 24 hours per day, 7 days per week. The construction and eventual operation of the proposed Amend Lee Plan Policies 1.2.7 and 47.3.4, along with the Amend Development Schedule Table 5(a), will not hamper or impede our ability to continue providing excellent response service to the Southwest Florida International Airport.

Please contact me if additional information is needed.

Sincerely,

LEE COUNTY PORT AUTHORITY

Ed Howell, Chief
Aircraft Rescue and Fire Fighting

L10 JohnsonEng
Attachment

cc/att: Ellen Lindblad, Planning and Environmental Compliance
Gary Duncan, Aviation
Greg Hagen, Legal

SOUTHWEST FLORIDA INTERNATIONAL AIRPORT

11000 Terminal Access Road, Suite 8671 Fort Myers, Florida 33913-8899
www.flylcpa.com

JOHNSON ENGINEERING

August 20, 2010

Mr. Ed Howell, Chief
Aircraft Rescue and Fire Fighting
Lee County Port Authority
11000 Terminal Access Road
Suite 8671
Fort Myers, Florida 33913

Re: RSW Comprehensive Plan Amendment
Request for Letter of Service Availability

Dear Chief Howell:

We are in the process of preparing an application for a Comprehensive Plan Amendment for Lee County Port Authority for Southwest Florida International Airport. The Southwest Florida International Airport (RSW) property comprises approximately 6,367 acres within the Gateway/Airport Planning Community. The following is a summary of the requested text changes requested within the subject application:

- Amend Lee Plan Policy 1.2.7 to reflect additional acreage allowed for non-aviation development.
Change the limit of allowable non-aviation development area North of Runway 6-24 from 100 acres to 300 acres, an additional 200 acres.
- Amend Lee Plan Policy 47.3.4 to indicate that non-aviation uses are scheduled through 2030 in Development Schedule Table 5(a).
The proposed development schedule for the Southwest Florida International Airport is amended to reflect through the year 2030 for non aviation uses.
- Amend Development Schedule Table 5(a) in order to reflect additional square feet of development in the non-aviation area North of Runway 6-24.

<u>North of Runway 6-24</u>	
Commercial Retail, Restaurant and Service	<u>221,750 SF</u>
Gas station/convenience store	<u>5,000 SF w/ 24 pumps</u>
Hotel	<u>187 rooms</u>
Light Manufacturing/Assembly	<u>147,500 SF</u>
Warehouse/Distribution	<u>329,200 SF</u>
Office (This development includes 10% retail.)	<u>162,500 SF</u>

The application requires we obtain a Letter of Service Availability from all providers, which must be filed with the application package. If you could please provide us with a letter of availability for your service at your earliest convenience, we would greatly appreciate it.

We appreciate your attention to this matter. If you have any questions, or require additional information, please do not hesitate to contact me at (239) 334-0046.

Sincerely,

JOHNSON ENGINEERING, INC.

A handwritten signature in black ink, appearing to read 'Debi Pendlebury', written in a cursive style.

Debi Pendlebury
Principal Planner

dlp/20087500



LEE COUNTY

SOUTHWEST FLORIDA

BOARD OF COUNTY COMMISSIONERS

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County Manager

David M. Owen
County Attorney

Diana M. Parker
County Hearing
Examiner

Writer's Direct Dial Number: (239) 533-8532

October 25, 2010

Debi Pendlebury
Johnson Engineering, Inc.
2122 Johnson Street
Fort Myers, FL 33901

RE: Potable Water and Wastewater Availability
RSW – Comprehensive Plan Amendment (SWFIA)
STRAP #: 19-45-26-00-00002.00000

Dear Pendlebury:

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.

Your firm has indicated that this project will consist of 253,750 sq. ft. of commercial, 329,200 sq. ft. of industrial, 162,500 sq. ft. of office, 147,500 sq. ft. of light manufacture, and a 187-room hotel, all with an estimated flow demand of approximately 152,643 gallons per day. Lee County Utilities presently has sufficient capacity to provide potable water and sanitary sewer service as estimated above.

Availability of potable water and sanitary sewer service is contingent upon final acceptance of the infrastructure constructed by the developer. Upon completion and final acceptance of this project, potable water service will be provided through our Corkscrew Water Treatment Plant.

Sanitary sewer service will be provided by Gateway Wastewater Treatment Plant. The Lee County Utilities' Design Manual requires the project engineer to perform hydraulic computations to determine what impact this project will have on our existing system.

Prior to beginning design work on this project, please schedule a meeting with Thom Osterhout to determine the best point of connection and discuss requirements for construction.

This letter is not a commitment to serve, but only as to the availability of service. Lee County Utilities will commit to serve only upon receipt of all appropriate connection fees, a signed request for service and/or an executed service agreement, and the approval of all State and local regulatory agencies.

Further, this letter of availability of Water and Wastewater service to be utilized for a Lee Plan Amendment for this project Only. Individual letters of availability will be required for the purpose of obtaining building permits.

Sincerely,

LEE COUNTY UTILITIES

Mary McCormic
Technician Senior
UTILITIES ENGINEERING

VIA EMAIL
Original Mailed



LEE COUNTY
SOUTH WEST FLORIDA

LEE COUNTY UTILITIES
REQUEST FOR LETTERS OF AVAILABILITY

DATE: SEPTEMBER 8, 2010

TO: Melissa Bibeau
Utilities' Engineering Technician

FROM: DEBI PENDLEBURY

FIRM: JOHNSON ENGINEERING, INC.

ADDRESS: 2122 JOHNSON STREET

ADDRESS: FORT MYERS, FLORIDA 33901

PHONE#: (239)334-3661 FAX: (239)334-3661

E-MAIL ADDRESS: DPENDLEBURY@JOHNSONENG.COM

PROJECT NAME: RSW COMPREHENSIVE PLAN AMENDMENT (SWFIA)

PROJECT ID: _____

STRAP #: 19-45-26-00-00002.0000

LOCATION/SITE ADDRESS: 11000 TERMINAL ACCESS ROAD FORT MYERS, FLORIDA 33913

PURPOSE OF LETTER:

- ☐ DEVELOPMENT ORDER SUBMITTAL ☐ FINANCING ☐ EFFLUENT REUSE
☐ PERMITTING OF SURFACE WATER MANAGEMENT (SOUTH FLORIDA WATER MANAGEMENT DISTRICT)
☒ OTHER: (PLEASE SPECIFY) COMP PLAN AMENDMENT FOR FUTURE DEVELOPMENT THRU 2030

PLANNED USE:

- ☐ COMMERCIAL ☐ INDUSTRIAL ☐ RESIDENTIAL - (☐ SINGLE-FAMILY ☐ MULTI-FAMILY)
☒ OTHER: (PLEASE SPECIFY) NON-AVIATION USES

PLANNED # OF UNITS/BUILDINGS: UNKNOWN AT THIS TIME

TOTAL SQUARE FOOTAGE (COMMERCIAL/INDUSTRIAL) 892,950 +/- + 187 HOTEL UNITS

AVERAGE ESTIMATED DAILY FLOW (GPD): _____ (☒ 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: ESTIMATED GPD = 152,643

Commercial/retail = 253,750sf x 0.15 = 38,063 GPD Warehouse = 329,200sf x 0.15 = 49,380 GPD

Hotel rooms = 187 rooms x 100 GPD = 18,700 GPD Office = 162,500sf x 0.15 = 24,375 GPD

Light Manufacture = 147,500sf x 0.15 = 22,125 GPD

Please e-mail the completed form to mbibeau@leegov.com If you are unable to e-mail the completed form, please fax to (239) 485-8385. If you should have any questions or require assistance, please feel free to call our office at (239) 533-8525.



BOARD OF COUNTY COMMISSIONERS

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David M. Owen
County Attorney

Diana M. Parker
County Hearing
Examiner

September 3, 2010

Ms. Debi Pendlebury
Johnson Engineering, Inc.
2122 Johnson St.
PO Box 1550
Ft. Myers, FL 33902-1550

SUBJECT: RSW Comprehensive Plan Amendment

Dear Ms. Pendlebury:

The Lee County Solid Waste Division is capable of providing commercial solid waste collection service for the commercial property located on the 6,367 acres within the Gateway/Airport Planning Community through our franchised hauling contractors. Disposal of the solid waste from this commercial property will be accomplished at the Lee County Resource Recovery Facility and the Lee-Hendry Regional Landfill. Plans have been made, allowing for growth, to maintain long-term disposal capacity at these facilities.

The Solid Waste Ordinance (08-10, Section 21) and the Lee County Land Development Code, Chapter 10, Section 10-261 have requirements for providing on-site space for placement and servicing of commercial solid waste containers. Please review these requirements when planning the project. If you have any questions, please call me at (239) 533-8000.

Sincerely,

William T. Newman
Operations Manager
Solid Waste Division



August 20, 2010

Mr. Lindsey Sampson, P.E.
Lee County Solid Waste Department
10500 Buckingham Road
Fort Myers, Florida 33905

Re: RSW Comprehensive Plan Amendment
Request for Letter of Service Availability

Dear Mr. Sampson:

We are in the process of preparing an application for a Comprehensive Plan Amendment for Lee County Port Authority for Southwest Florida International Airport. The Southwest Florida International Airport (RSW) property comprises approximately 6,367 acres within the Gateway/Airport Planning Community. The following is a summary of the requested text changes requested within the subject application:

- Amend Lee Plan Policy 1.2.7 to reflect additional acreage allowed for non-aviation development.
Change the limit of allowable non-aviation development area North of Runway 6-24 from 100 acres to 300 acres, an additional 200 acres.
- Amend Lee Plan Policy 47.3.4 to indicate that non-aviation uses are scheduled through 2030 in Development Schedule Table 5(a).
The proposed development schedule for the Southwest Florida International Airport is amended to reflect through the year 2030 for non aviation uses.
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The application requires we obtain a Letter of Service Availability from all providers, which must be filed with the application package. If you could please provide us with a letter of availability for your service at your earliest convenience, we would greatly appreciate it.

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Sincerely,

JOHNSON ENGINEERING, INC.

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Debi Pendlebury
Principal Planner

dlp/20087500

**RSW COMPREHENSIVE PLAN AMENDMENT
ENVIRONMENTAL IMPACT ANALYSIS**

September 2010

Prepared for:

*Lee County Port Authority
11000 Terminal Access Road
Fort Myers, Florida 33913*

Prepared by:

JOHNSON
ENGINEERING
2122 Johnson Street
Fort Myers, Florida 33901
(239) 334-0046
E B 642

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1.0 INTRODUCTION

The Lee County Port Authority (LCPA) is applying for a comprehensive plan amendment to allow for additional non-aviation uses within the Southwest Florida International Airport (RSW) property designated as non-aviation support. The subject property is located along the north boundary of RSW, south of Daniels Parkway, and east of Treeline Avenue in central Lee County. The project site is located within Sections 18, 19, Township 45 South and Range 26 East, and Section 24, Township 45 South, and Rang 25 East.

The majority of the site (634.36 acres) is currently undeveloped consisting of forested uplands and wetlands, isolated herbaceous wetlands, mowed areas maintained for access, and abandoned agricultural areas. The remaining portions (69.41 acres) of the project site have been cleared for airport operational facilities such as the airport rental car facility, airport surveillance radar (ASR) and low level windshear alert system (LLWAS).

This Environmental Impact Analysis includes the following information in order to meet the requirements of the Lee County Comprehensive Plan Amendment application process:

1. A map of the plant communities as defined by the Florida Land Use, Cover and Forms Classification System (FLUCFCS);
2. A map and description of the soils found on the property;
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 map depicting the noise zones for RSW; and
7. A table of plant communities by FLUCFCS 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 includes the listed species by FLUCFCS and species status.

Also included in this assessment is a discussion on the hazardous wildlife requirements for development on and near airport property as regulated by the Federal Aviation Administration (FAA).

2.0 FLUCFCS INFORMATION AND MAP

Kevin L. Erwin Consulting Ecologists, Inc. (KLECE) mapped the major plant communities in 2001 for the entire airport property as part of the airport's Master Plan update. The mapping effort utilized rectified digital aerial photography, and involved extensive field verifications. Habitat types were mapped using FLUCFCS to Level III. A fourth level (Level IV) was included where appropriate to further identify specific habitat types. Any standard three digit FLUCFCS code which has a 9 added to the end indicates that the habitat was disturbed. Disturbances on this property were due primarily to the presence of invasive exotic vegetation. As part of the mapping process, the approximate level of invasive exotic/nuisance plant species infestations within each plant community was determined. Plant communities were broken down into four potential categories of invasive exotic/nuisance infestations and the following letter qualifier was added to the Level IV FLUCFCS code where appropriate:

- a = 5-24% cover by invasive exotic/nuisance species
- b = 25-49% cover by invasive exotic/nuisance species
- c = 50-74% cover by invasive exotic/nuisance species
- d = >75% cover by invasive exotic/nuisance species

These disturbance designators were not added to FLUCFCS codes for areas such as improved pasture, fallow cropland, and road ways that are, by definition, highly disturbed habitats. Areas without an exotic species designator (a, b, c, or d) contained less than five percent cover by invasive exotic or nuisance species.

For the purposes of this Comprehensive Plan Amendment application, the 2001 KLECE habitat mapping was utilized for the project site and portions updated by Johnson Engineering, Inc. (JEI) in March 2010. The following vegetation descriptions are based on the original fieldwork conducted by KLECE in 2001 and the fieldwork conducted by JEI in 2010. The descriptions include the dominant plant species for each strata.

These descriptions are based on areas of the particular habitat that contained relatively low levels of exotic or nuisance plants. For example, the description of the freshwater marsh community was based on typical conditions observed in the areas delineated as FLUCFCS codes 641 (marsh with less than five percent exotics) and 6419a (marsh with 5 – 24 percent exotics). Plant species

diversity in habitats assigned as category “a” had similar native species diversities to the same habitats with less than five percent exotic/nuisance species infestation. Species diversity in habitats assigned as categories “b” and “c” contained fewer native species, and each native species constituted a smaller percentage of the total vegetative cover than the same habitats with less than five percent cover by exotic/nuisance species. Category “d” was nearly devoid of all native vegetative cover, and species present comprised a low percentage of the total area. Areas mapped as exotics (i.e. FLUCFCS Code 422 for Brazilian pepper) typically contained less than five percent remnant native vegetation.

Fallow Cropland (FLUCFCS Code 261 – 30.77 acres, 4.37%)

Fallow cropland is characterized by a mosaic of open areas with thick patches of Brazilian pepper (*Schinus terebinthifolius*) and wax-myrtle (*Myrica cerifera*). Ground vegetation consists of pasture grasses and invasive species such as Bahia grass (*Paspalum notatum*), broom sedge (*Andropogon virginicus*), common carpet grass (*Axonopus fissifolius*), crab grass (*Digitaria* sp.), dog fennel (*Eupatorium capillifolium*) and flat sedges (*Cyperus* spp.). The prevalence of shrubs and sapling trees, which is indicative of a lack of routine agricultural management, differentiates this habitat type from improved pastures. Fallow croplands are dominated by exotic/nuisance plant species and provide minimal habitat for listed species.

Pine Flatwoods (FLUCFCS Code 411 – 172.41 acres, 24.50%)

Pine flatwoods, an upland community, is dominated by an overstory of slash pine (*Pinus elliottii* var. *densa*) with scattered cabbage palm (*Sabal palmetto*) and wax-myrtle. The understory is dominated by saw palmetto (*Serenoa repens*), ranging from 3 to 7 feet in height, with scattered Caesar-weed (*Urena lobata*), pawpaw (*Asimina* sp.), running oak (*Quercus pumila*), beak rushes (*Rhynchospora* spp.) and sunbonnet (*Chaptalia tomentosa*). Several isolated areas of flatwoods appear to have burned in the latter half of the 1990's. In these areas, the saw palmetto is shorter and there is a greater variety of ground cover species. All the pine flatwoods within the project site appear to have been logged and are comprised of several age classes of pines. The majority of the flatwoods are dominated by relatively small pine trees (DBH of less than six inches) with scattered larger trees. The lack of significant numbers of larger and older pine trees combined

with relatively dense mid-canopy limits the potential use of these flatwoods for nesting by species such as the Federally Endangered Red-cockaded Woodpecker and the Bald Eagle.

Brazilian Pepper (FLUCFCS Code 422 – 0.39 acres, 0.06%)

This FLUCFCS Code was used to identify upland areas dominated by Brazilian pepper. Due to the thick growth of invasive exotics, few native species are present. This habitat type is typically associated with human disturbances such as the perimeter berms of farm fields.

Cabbage palm, Disturbed (FLUCFCS Code 4289 – 2.64 acres, 0.38%)

This code describes a forest community that is predominately cabbage palm (*Sabal palmetto*) in the upper canopy. The only representation of this plant community within the project site consists of over 75% coverage of Brazilian pepper.

Wax-myrtle/Willow, Hydric (FLUCFCS Code 6318 – 112.82 acres, 16.03%)

These wetland areas consist mainly of the fringes of large seasonal ponds. These areas were historically wet prairies. Based on a review of historic aerials and observations in the field, it is apparent that many of these transitional zones were cultivated for row crops such as tomatoes, peppers, or melons in the past. During the winter growing season for row crops in Southwest Florida, these transitional zones would retain sufficient moisture to grow crops without the need of supplemental irrigation. The furrows created by the farming can be seen on historical aerial photographs and are still noticeable on the ground today. This disturbance has resulted in a reduced hydroperiod caused by the agricultural canals, and combined with a reduced fire frequency has facilitated the establishment of wax-myrtle and Carolina willow (*Salix caroliniana*) as the dominant vegetation. Ground cover species consist of beak rushes, common carpet grass, crab grass, flat sedges, flat-topped goldenrod (*Euthamia minor*), and blue maidencane (*Amphicarpum muhlenbergianum*). Areas mapped as FLUCFCS Code 6318 were dry during the original survey period in 2001 but are typically inundated by 2-6 inches of water during the wet season.

Wax-myrtle/Willow, Disturbed (FLUCFCS Code 6319 – 56.01 acres, 7.96%)

The 6319 FLUCFCS Code is used to describe an area of abandoned farm field located south of the Daniels Parkway primarily in Section 24. This area was cleared prior to 1966 and, based on a review of aerial photography, had already been fallow for several years by 1986. Currently the field is dominated by wax-myrtle and Carolina willow. Additional species commonly occurring in this habitat type include Bahia grass, flat-topped goldenrod, blue maidencane, grape vine (*Vitis* sp.) and torpedo grass (*Panicum repens*). Widely scattered slash pine and live oaks (*Quercus virginiana*) are also present.

Drainage Canal (FLUCFCS Code 514 – 4.76 acres, 0.68%)

Previous agricultural operations created a network of drainage canals on the airport property including within the project site. These canals typically interconnect the large and otherwise isolated seasonal ponds and have altered the hydrology of these areas. The berms adjacent to these drainage ditches are typically densely vegetated by opportunistic and often exotic species such as melaleuca (*Melaleuca quinquenervia*), Brazilian pepper, willow or wax-myrtle. Vegetation within the ditches varies depending on adjacent land use. However, pickerel weed (*Pontederia cordata*), Peruvian primrose willow (*Ludwigia peruviana*), water lettuce (*Pistia stratiotes*) and torpedo grass, were consistently found in the canals.

Cypress (FLUCFCS Code 621 – 23.57 acres, 3.35%)

This wetland community is dominated by cypress (*Taxodium* sp.), cabbage palm, slash pine and melaleuca. Wax-myrtle was the dominant mid-story species with scattered willow and Brazilian pepper. Dominant understory species include swamp fern (*Blechnum serrulatum*), bald-rush (*Psilocarya nitens*), poison ivy (*Toxicodendron radicans*) and bladderwort (*Utricularia* spp.). Several species of airplants including common wild pine (*Tillandsia fasciculata*), needle-leaf airplant (*Tillandsia setacea*), inflated wild pine (*Tillandsia balbisiana*), Spanish moss (*Tillandsia usneoides*) and ball-moss (*Tillandsia recurvata*) were found in cypress plant communities. Cypress swamps provide suitable potential habitat for listed species such as wading birds and the Big Cypress fox squirrel. Water marks and adventitious roots on trees indicate that water depths of up to 36 – 48 inches deep occur in some portions of this habitat during the wet season.

Cypress-Pine-Cabbage Palm, Disturbed (FLUCFCS Code 6249 – 2.34 acres, 0.33%)

This wetland community represents a transitional zone from cypress to pine flatwoods and contains many species present in both community types. The canopy is dominated by cypress, cabbage palm, and slash pine, with varying amounts of melaleuca. The mid-story is dominated by young cypress and cabbage palm with lesser densities of Brazilian pepper and dahoon holly (*Ilex cassine*). Dominant plants in the understory were typical of both cypress and hydric pine plant communities. Swamp fern was the dominant understory plant, however, gulfdune paspalum (*Paspalum monostachyum*), blue maidencane and pink sundew (*Drosera capillaries*) made up a large proportion of the ground cover. Islands of saw palmetto were also present. Water depths of 6 – 10 inches are common during the wet season.

Hydric Pine Flatwoods (FLUCFCS Code 625 – 87.95 acres, 12.50%)

This wetland plant community is dominated by slash pine, with minor amounts of melaleuca and cabbage palm. The mid-story consists of myrsine (*Myrsine guianensis*) and lesser densities of wax-myrtle and dahoon holly. The understory consists of blue maidencane, red root (*Lachnanthes caroliniana*), yellow-eyed grass (*Xyris* spp.), maidencane (*Panicum hemitomom*), pink sundew, wire grass (*Aristida stricta*) and inundated beak rush (*Rhynchospora inundata*). Fire suppression and period logging have resulted in a dense stand of thin pine trees unsuitable for many listed species. These areas are typically inundated by 1 -4 inches of water during portions of the wet season.

Freshwater Marsh (FLUCFCS Code 641 – 80.32 acres, 11.41%)

Freshwater marshes occur as large depressions (also known as seasonal ponds) in the landscape and within the center, deepest, portions of cypress swamps. Dominant plant species include arrowhead (*Sagittaria lancifolia*), beak rushes, blue hyssop (*Bacopa caroliniana*), corkwood (*Stillingia aquatica*), maidencane, pickerel weed and spikerush (*Eleocharis cellulosa*). Several of the freshwater marshes on-site contain small shrub islands. These areas are vegetated by short willow and buttonbush (*Cephalanthus occidentalis*) with sawgrass (*Cladium jamaicense*), Peruvian primrose willow and white vine (*Sarcostemma clausum*). Freshwater marshes provide suitable habitat for many listed species, especially wading birds. Water levels during the wet

season, as estimated from water marks and adventitious roots, were as deep as 48 inches in several locations.

Wet Prairie (FLUCFCS Code 643 – 4.93 acres, 0.70%)

Many of the areas on-site that were historically wet prairie have become over grown by wax-myrtle and therefore, have been mapped as FLUCFCS Codes 6318. The remaining areas of this wetland plant community type are dominated by species such as blue maidencane, mild water-pepper (*Polygonum hydropiperoides*), blue hyssop, climbing hempvine (*Mikania scandens*), corkwood, frogfruit (*Phyla nodiflora*), hatpin (*Eriocaulon decangulare*), inundated beak rush, red ludwigia (*Ludwigia repens*), sand cordgrass (*Spartina bakeri*), St. John's wort (*Hypericum* sp.), umbrella grass (*Fuirena* sp.), and yellow-eyed grass. These areas are typically inundated by 3 – 8 inches of water during the wet season. Wet prairies provide periodic foraging habitat opportunities for wading birds as water levels recede at the end of the wet season.

Borrow Areas (FLUCFCS Code 742 – 6.06 acres, 0.86%)

Borrow areas were excavated during the construction of the existing airport facilities. They were used both to provide fill material and surface water management. Few patches of emergent vegetation exist in the center of these areas. The littoral zones of the borrow areas, ranging from approximately 3 – 20 feet in width, are dominated by spikerush and torpedo grass. Wading birds were frequently found around the edge of this habitat type.

Cleared Areas (FLUCFCS Code 748 – 56.18 acres, 7.98%)

The cleared areas category was used to delineate those areas of the site that have been previously cleared of the majority of the native vegetation and are periodically mowed. These areas are vegetated primarily by ground cover species such as bahia grass, Caesar-weed, common carpet grass, coinwort (*Centella asiatica*) and marsh pennywort (*Hydrocotyle umbellata*). Scattered clumps of pines, Brazilian pepper and wax-myrtle are also present. The shrub layer becomes more predominant in areas that are not frequently mowed.

Cleared Areas, Hydric (FLUCFCS Code 7481 – 4.03 acres, 0.57%)

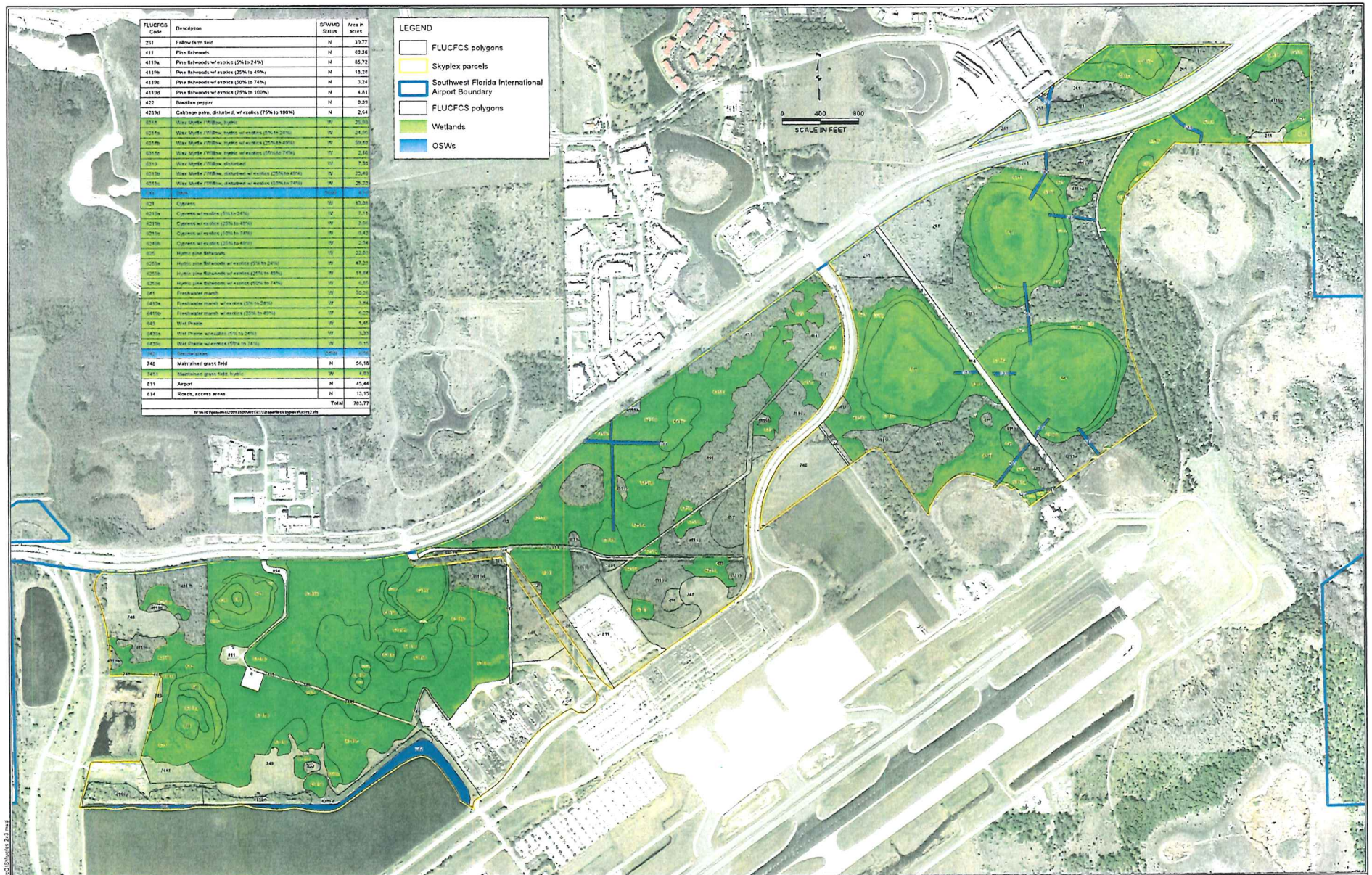
These cleared areas are also mowed regularly but exhibit a plant composition indicative of a wetland. The majority of the species present are native and are comprised of mermaid weed (*Proserpinaca pectinata*), arrowhead, Virginia buttonweed (*Diodia virginiana*), coinwort, frog fruit, primrose willow (*Ludwigia peruviana*), yellow-eyed grass, marsh pennywort, knotgrass (*Paspalum distichum*), Leavenworth's tickseed (*Coreopsis leavenworthii*), spreading beaksedge (*Rhynchospora divergens*), rosy camphorweed (*Pluchea rosea*), common carpet grass, Baldwin's spikerush (*Eleocharis baldwinii*), nutrush (*Scleria* sp.), thalia lovegrass (*Eragrostis atrovirens*), coastal lovegrass (*Eragrostis virginica*), swamp flatsedge (*Cyperus ligularis*), sand cordgrass, chalky bluestem (*Andropogon virginicus* var. *glaucus*), and torpedo grass.

Airport (FLUCFCS Code 811 – 45.44 acres, 6.46%)

This FLUCFCS Code was used to delineate existing airport support facilities located within the project site.

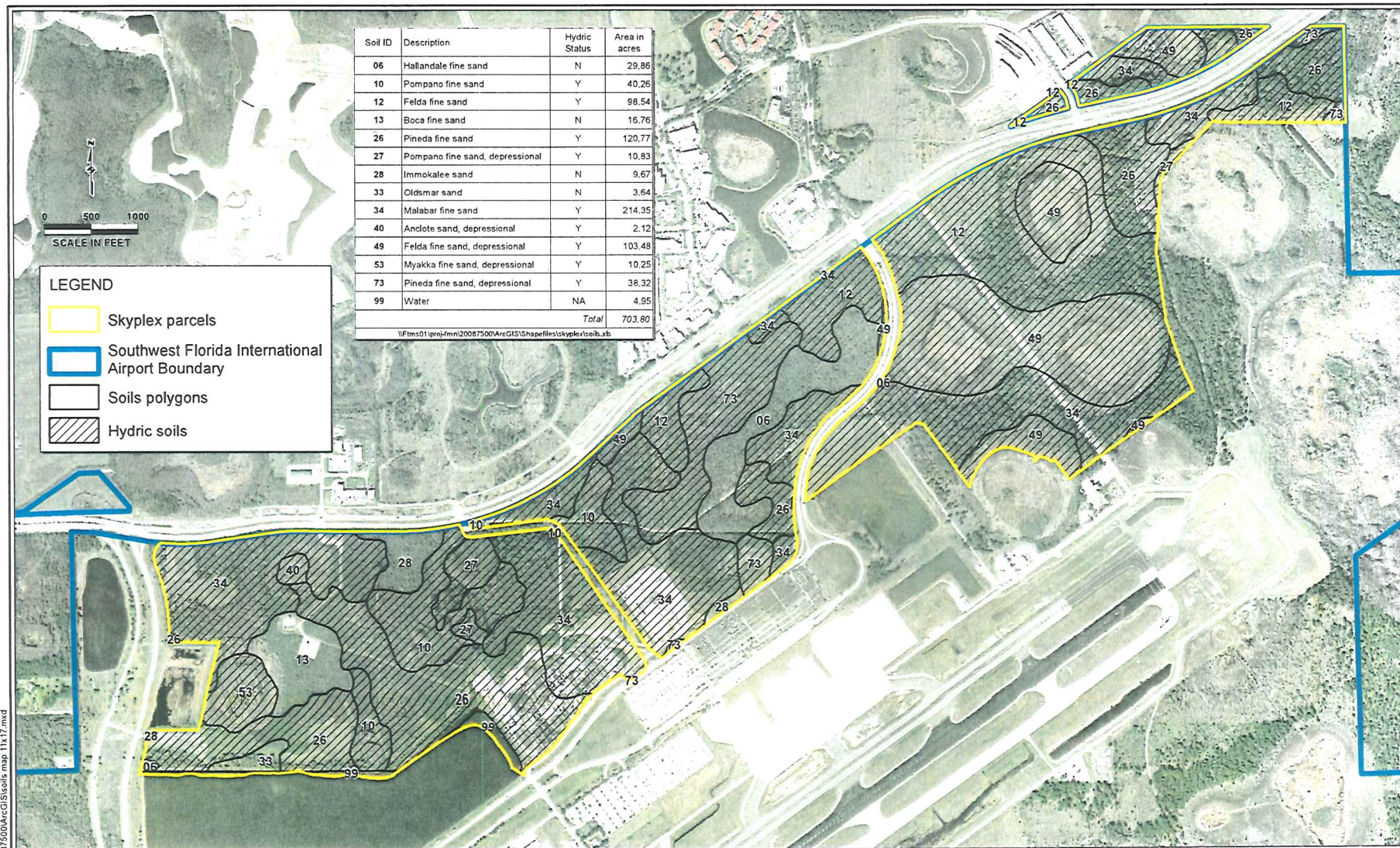
Roads and Highways (FLUCFCS Code 814 – 13.15 acres, 1.87%)

This FLUCFCS Code consists of a paved road (Fuel Farm Road) and dirt roads filled above natural grade that are located within the project boundary. For the paved road, the mapping unit includes the actual road and the fill side slope. Dominant species found in the unpaved areas include bahia grass, Bermuda grass (*Cynodon dactylon*), common carpet grass and marsh pennywort. Even though the roadside shoulders were dry during the survey period, portions of this mapping unit are inundated during the wet season.



3.0 SOILS INFORMATION AND MAP

The information on the soils found on the project site was obtained from the Soil Survey of Lee County, Florida developed by the U.S. Department of Agriculture Soil Conservation Service (1984).



Soil ID	Description	Hydric Status	Area in acres
06	Hallandale fine sand	N	29.86
10	Pompano fine sand	Y	40.26
12	Felda fine sand	Y	98.54
13	Boca fine sand	N	16.76
26	Pineda fine sand	Y	120.77
27	Pompano fine sand, depressional	Y	10.83
28	Immokalee sand	N	9.67
33	Oldsmar sand	N	3.64
34	Malabar fine sand	Y	214.35
40	Ancote sand, depressional	Y	2.12
49	Felda fine sand, depressional	Y	103.48
53	Myakka fine sand, depressional	Y	10.25
73	Pineda fine sand, depressional	Y	36.32
99	Water	NA	4.95
Total			703.80

LEGEND

- Skyplex parcels
- Southwest Florida International Airport Boundary
- Soils polygons
- Hydric soils

\\fms01\proj-fm\20087500\ArcGIS\Shapefiles\skyplex\soils.mxd



Southwest Florida International Airport
Lee County, Florida



2122 JOHNSON STREET
P.O. BOX 1550
FORT MYERS, FLORIDA 33902-1550
PHONE (941) 334-0046
FAX (941) 334-3661
E.B. #642 & L.B. #642

Soils Map Exhibit IV.C.2				
DATE	PROJECT NO.	FILE NO.	SCALE	SHEET
Feb. 2010	20087500	-	As Shown	1

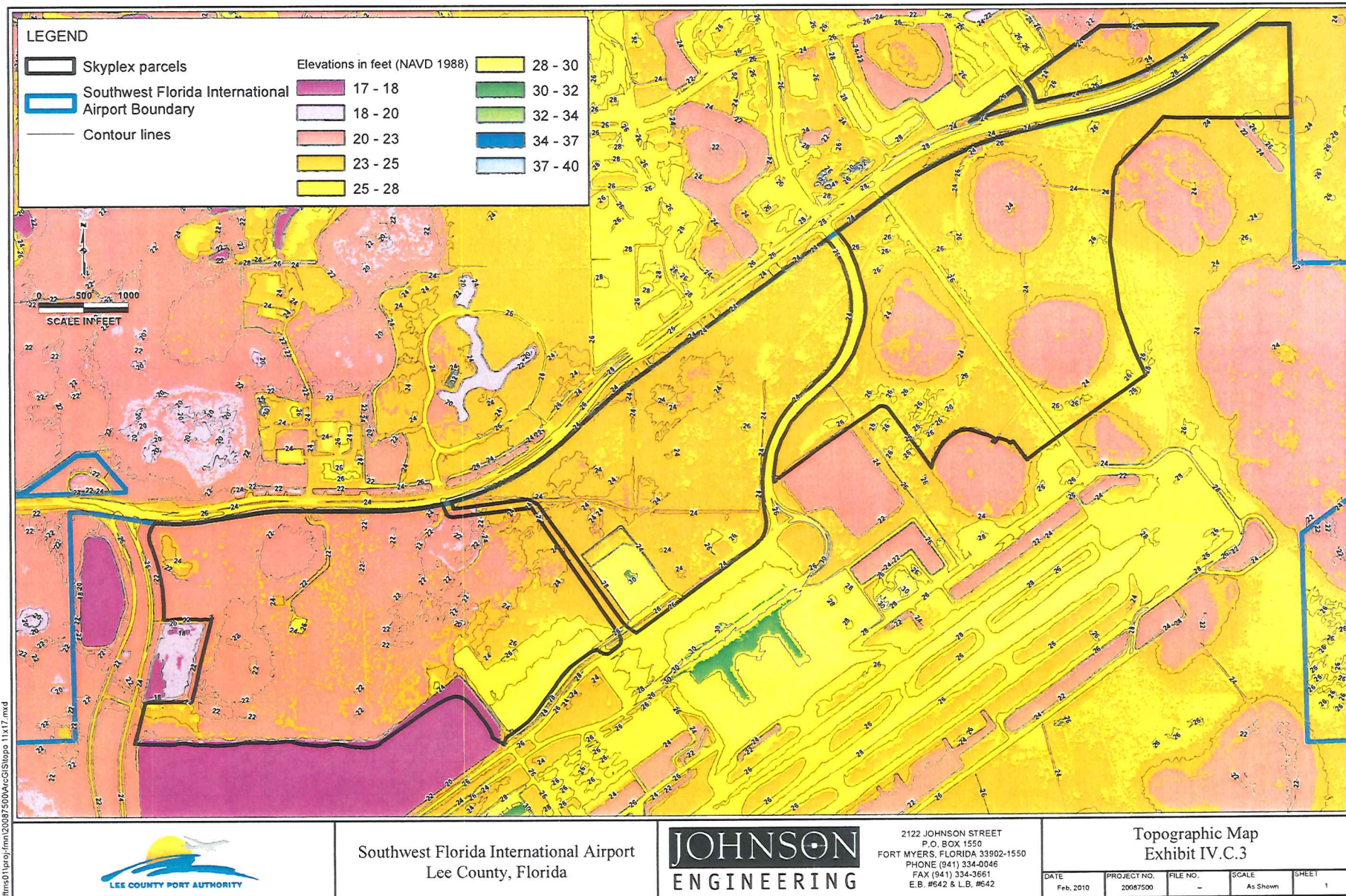
Table 3-1 Soils Information

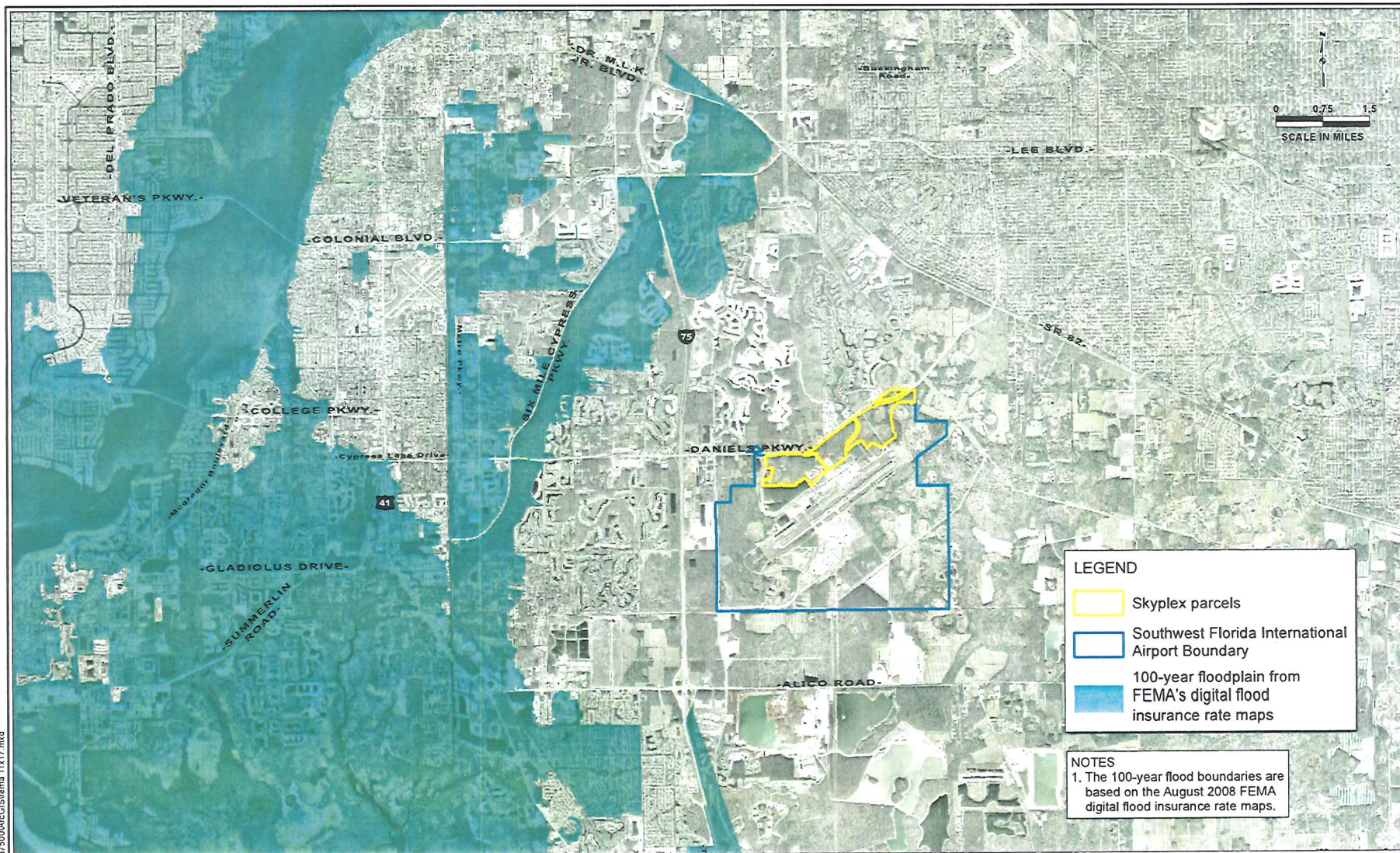
Soil ID	Soil Name	Brief Soil Description	Seasonal High Water Table Depth Duration (ft)	Permeability Rate (In/hour)		Limitation for low buildings	Degree and Kind of Limitation for Pond Embankments	Hydric Status	Area in acres
				In	In/hr				
06	Hallandale fine sand	Level, poorly drained soil on low, broad flatwoods area; slope at 0-2%; gray fine sand	0-1; Jun-Nov	0-2 2-7 7-12 12	6.0-20 6.0-20 0.6-6.0 ---	Severe	Severe	N	29.86
10	Pompano fine sand	Nearly level, poorly drained soil on sloughs; slopes are smooth to concave & range from 0-1%; fine sand	0-1; Jun-Nov	0-80	6.0-20	Severe	Severe	Y	40.26
12	Felda fine sand	Nearly level, poorly drained soil on broad, nearly level sloughs; slopes are smooth to concave & range from 0-2%; fine sand	0-1; Jul-Mar	0-22 22-38 38-80	6.0-20 0.6-6.0 6.0-20	Severe	severe	Y	98.54
13	Boca fine sand	Nearly level, poorly drained soil on flatwoods; slopes are smooth & range from 0-2%; fine sand	0-1; Jun-Feb	0-3 3-25 25-30 30	6.0-20 6.0-20 0.6-2 ---	Severe	Severe	N	16.76
26	Pineda fine sand	Nearly level, poorly drained soil in depressions; slopes are concave and less than 1%; fine sand	0-1; Jun-Nov	0-36 36-54 54-80	6.0-20 <0.2 2-6	Severe	Severe	Y	120.77
27	Pompano fine sand, depressional	Nearly level, poorly drained soil in depressions; slopes are concave and less than 1%; fine sand	+2-1; Jun-Feb	0-80	6.0-20	Severe	Severe	Y	10.83
28	Immokalee sand	Nearly level, poorly drained soil in flatwoods areas; slopes are smooth to convex and range from 0-2%; sand	0-1; Jun-Nov	0-9 9-36 36-55 55-80	6.0-20 6.0-20 0.6-2 6.0-20	Severe	Severe	N	9.67

Table 3-1 Soils Information (continued)

Soil ID	Soil Name	Brief Soil Description	Seasonal High Water Table Depth Duration (ft)	Permeability Rate (In/hour)		Limitation for low buildings	Degree and Kind of Limitation for Pond Embankments	Hydric Status	Area in acres
				In	In/hr				
33	Oldsmar sand	Nearly level, poorly drained soil on low, broad flatwoods area; slopes are smooth to slightly convex and range from 0-2%; fine sand to sand	0-1; Jun-Feb	0-42 42-47 47-58 58-80	6.0-20 0.2-6.0 <0.2 0.2-6.0	Severe	Severe	N	3.64
34	Malabar fine sand	Nearly level, poorly drained soil on sloughs; slopes are smooth to concave and range from 0-1%; fine sand	0-1; Jun-Nov	0-17 17-42 42-59 59-80	6.0-20 6.0-20 <0.2 2.0-20	Severe	Severe	Y	214.35
40	Ancote sand, depressional	Nearly level, poorly drained soil isolated depressions; slopes are smooth to concave and less than 1%; black sand	+2-0; Jun-Mar	0-22 22-80	6.0-20 6.0-20	Severe	Severe	Y	2.12
49	Felda fine sand, depressional	Nearly level, poorly drained soil in depressions; slopes are concave and less than 1%; fine sand	+2-1; Jun-Dec	0-35 35-52 52-80	6.0-20 0.6-6.0 6.0-20	Severe	Severe	Y	103.48
53	Myakka fine sand, depressional	Nearly level, poorly drained soil in depressions; slopes are concave and less than 1%; fine sand	+2-1; Jun-Feb	0-29 29-46 46-80	6.0-20 0.6-6.0 6.0-20	Severe	Severe	Y	10.25
73	Pineda fine sand, depressional	Nearly level, poorly drained soil in depressions; slopes are concave and less than 1%; fine sand	+2-1; Jun-Dec	0-30 30-55 55-80	6.0-20 <0.2 2.0-6.0	Severe	Severe	Y	38.32
99	Water	---	---	---	---	---	---	NA	4.95
							Total	703.80	

**4.0 TOPOGRAPHIC MAP, 100-YEAR FLOOD PRONE AREAS (FEMA), AND
FLOOD INSURANCE RATE MAP**





LEGEND

- Skyplex parcels
- Southwest Florida International Airport Boundary
- 100-year floodplain from FEMA's digital flood insurance rate maps

NOTES
 1. The 100-year flood boundaries are based on the August 2008 FEMA digital flood insurance rate maps.

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Flood Mapping

DATE	PROJECT NO.	FILE NO.	SCALE	SHEET
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LEGEND

- Skyplex parcels
- Southwest Florida International Airport Boundary

NOTES

1. The index map shown was produced by FEMA. Effective date is August 28, 2008.



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Flood Map Index
Exhibit IV.C.4

DATE	PROJECT NO.	FILE NO.	SCALE	SHEET
Feb. 2010	20087500	-	As Shown	1

5.0 WETLANDS INFORMATION AND MAP

The following wetland map of the project site was created using the field verified FLUCFCS map. The wetlands FLUCFCS codes are designated in a color separate from the other surface waters (OSW) and uplands on the following map. There are approximately 371.97 acres of wetlands, 320.98 acres of uplands, and 10.82 acres of OSW. Wetland limits have not been field delineated or survey located and therefore their locations are approximate. Jurisdictional wetland limits have not been agency reviewed or verified. A jurisdictional wetland determination would need to be performed in order to determine the exact extent and acreages for jurisdictional wetlands found within the project site.



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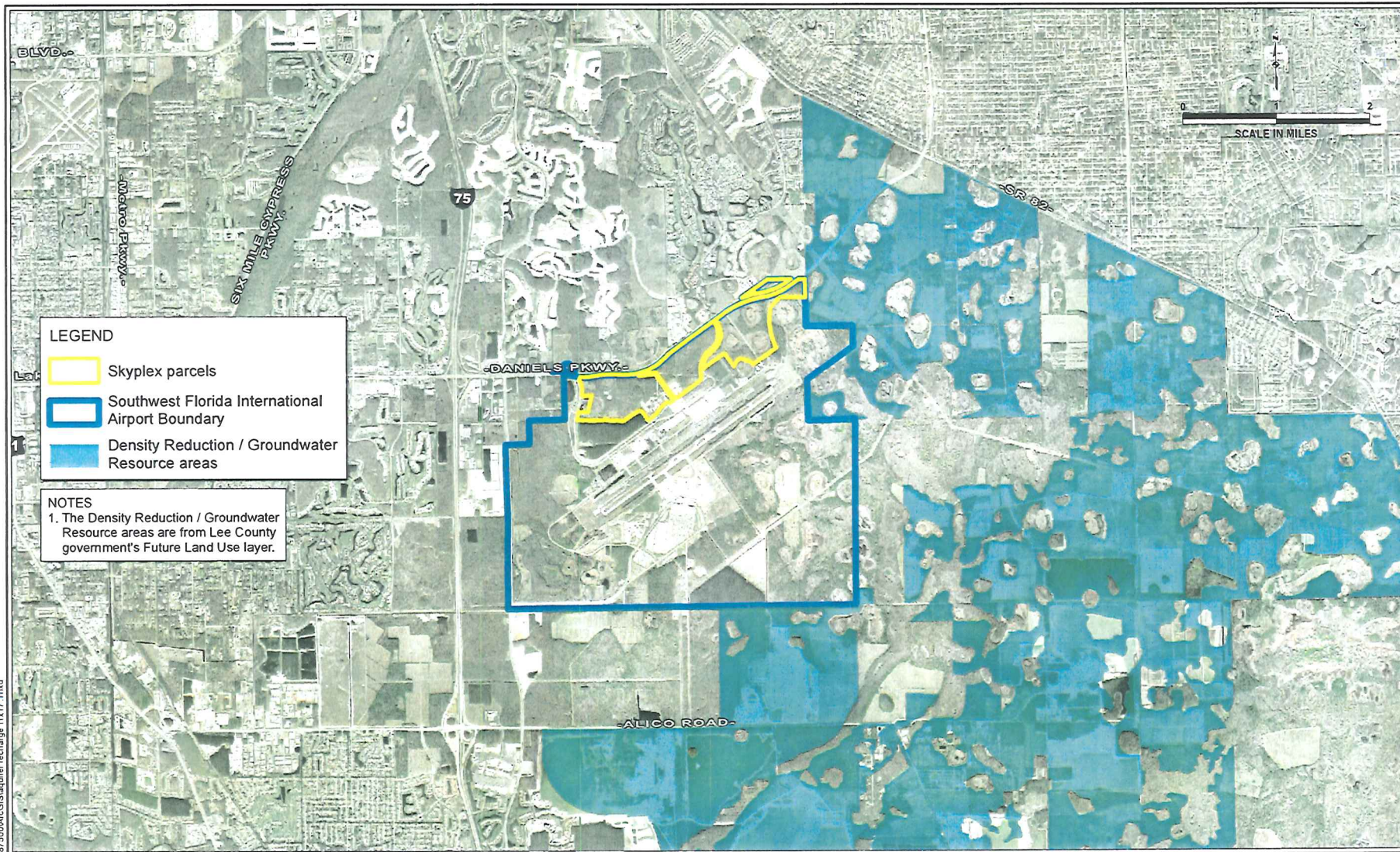
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Wetland / Upland Map
Exhibit IV.C.5

DATE	PROJECT NO.	FILE NO.	SCALE	SHEET
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6.0 AQUIFER RECHARGE AREAS MAP

There are no areas within the project site or the remaining airport property designated by Lee County as aquifer recharge areas.



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Aquifer Recharge Areas
Exhibit IV.C.5

DATE	PROJECT NO.	FILE NO.	SCALE	SHEET
Feb. 2010	20067500	-	As Shown	1



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7.0 RARE AND UNIQUE UPLANDS INFORMATION

Rare and Unique upland habitats as defined in the Lee Comprehensive Plan under Conservation and Coastal Management Element, Goal 74, Objective 74.1 include, but are not limited to: sand scrub (320); coastal scrub (322); those pine flatwoods (411) which can be categorized as "mature" due to the absence of severe impacts caused by logging, drainage, and exotic infestation; slash pine/midstory oak (412); tropical hardwood (426); live oak hammock (427); and cabbage palm hammock (428). The numbered references are to the FLUCFCS Level III. No Rare and Unique upland habitats were identified on-site. Even though FLUCFCS Code 411 occurs within the project site, this particular habitat does not meet the "mature" criteria. This area of Lee County was logged in the early part of the 20th century, as was much of southwest Florida. The drainage associated with Daniels Parkway, Paul J. Doherty Parkway, and former agricultural practices on this land have also impacted the drainage of the pine flatwoods located within the project site.

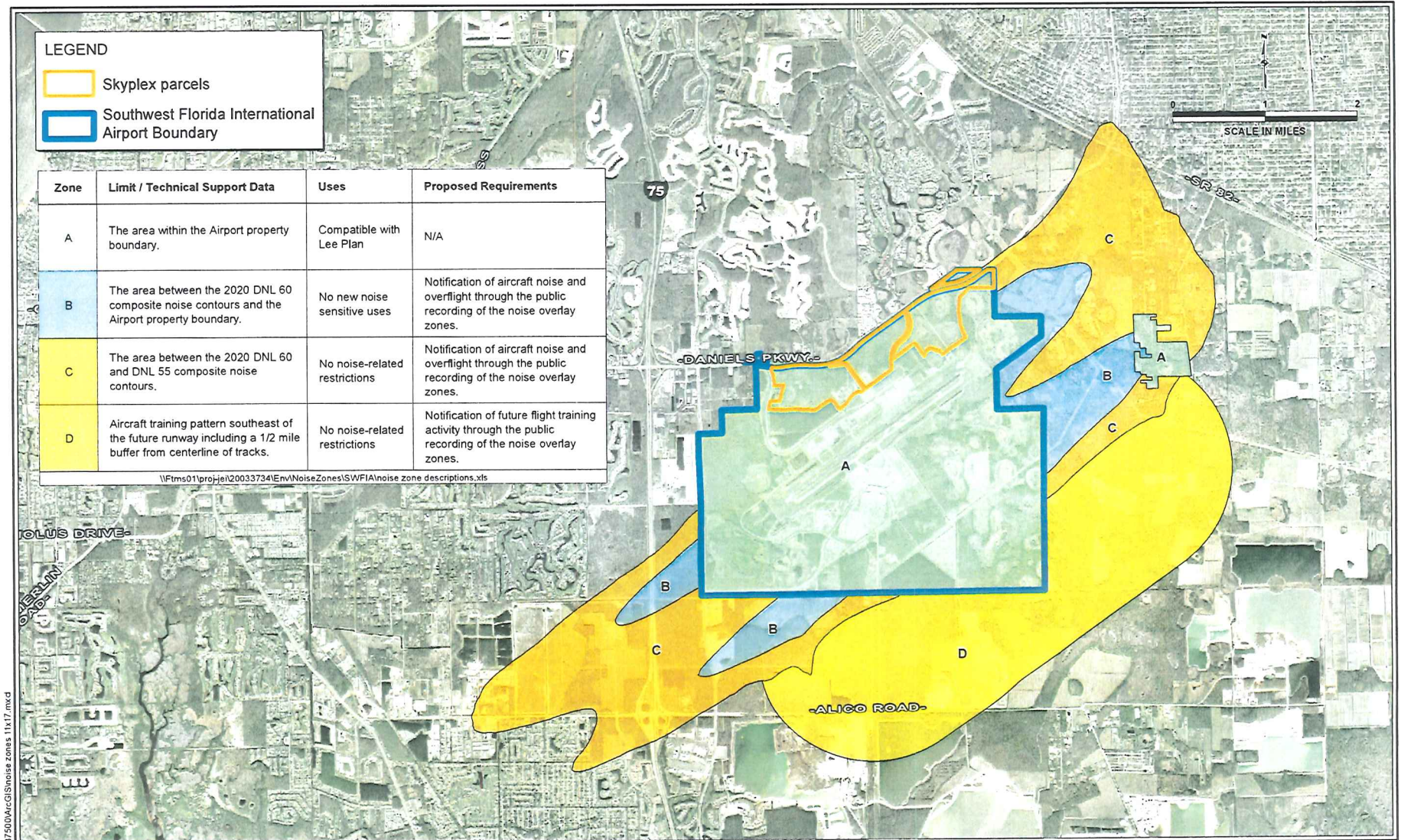
8.0 NOISE ZONES FOR SOUTHWEST FLORIDA INTERNATIONAL AIRPORT

LEGEND

-  Skyplex parcels
-  Southwest Florida International Airport Boundary

Zone	Limit / Technical Support Data	Uses	Proposed Requirements
A	The area within the Airport property boundary.	Compatible with Lee Plan	N/A
B	The area between the 2020 DNL 60 composite noise contours and the Airport property boundary.	No new noise sensitive uses	Notification of aircraft noise and overflight through the public recording of the noise overlay zones.
C	The area between the 2020 DNL 60 and DNL 55 composite noise contours.	No noise-related restrictions	Notification of aircraft noise and overflight through the public recording of the noise overlay zones.
D	Aircraft training pattern southeast of the future runway including a 1/2 mile buffer from centerline of tracks.	No noise-related restrictions	Notification of future flight training activity through the public recording of the noise overlay zones.

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Noise Overlay Zones

DATE	PROJECT NO.	FILE NO.	SCALE	SHEET
Feb. 2010	20087500	-	As Shown	1

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9.0 POTENTIAL PROTECTED SPECIES

The protection of rare and endangered species is regulated by Federal, State, and local agencies having jurisdiction over those particular species. The U.S. Fish and Wildlife Service (USFWS) regulate federally protected wildlife and plant species and also maintain the official lists of those species. At the State level, the Florida Fish and Wildlife Conservation Commission (FWC) regulate wildlife species and maintain the list of protected species. The Florida Department of Agriculture and Consumer Services (FDACS) regulate and maintain the list of protected plant species.

The FLUCFCS table below (Table 9-1) includes the listed animal and plant species having the potential to occur in each FLUCFCS category, according to Lee County Ordinance No. 94-10 and the current state and federal protected species lists. Five wildlife species are listed as endangered on the state list, federal list, or both. These species include the Florida panther, wood stork, red-cockaded woodpecker, snail kite, and American crocodile.

The majority of the property (526.99 acres) is outside of the US Fish and Wildlife Service Panther Focus Area (Figure 9-1). The northeast portion of the property (176.78 acres) falls within the Primary Panther Zone. A smaller section (~154 acres) of this portion of the property (excluding the two smaller parcels to the north) is also part of a larger roadless habitat patch as identified in the FWC Integrated Wildlife Habitat Ranking System 2008. Large habitat patches are important for wildlife utilization and especially the Florida panther, this portion of the habitat patch is on the fringe of the larger patch and does not provide connection to other parcels. The remainder of the property is fragmented by existing infrastructure, with no contiguous areas greater than one square mile. The most recent record of panther movement within the airport property boundary was in 2002.

The property is within the Wood Stork Core Foraging Area, the nearest active wood stork colony is in the Caloosahatchee River, approximately 10.5 miles from the property. The nearest documented active red-cockaded woodpecker cavity tree is nearly 20 miles south of the property site in Collier County. There are no known snail kites within the general vicinity of the property, and although the range for the American crocodile includes coastal Lee County, at this time there are no crocodiles known to inhabit the county.

Table 9-1 FLUCFCS Table											
FLUCFCS code	Description	Percent cover by exotic/nuisance plant species					Acreage	Potential listed species per FLUCFCS code			
		<5%	5-24%	25-49%	50-74%	>75%		Common name	Scientific name	Listed Status	
			(a)	(b)	(c)	(d)				State	Federal
261	Fallow farm field					30.77	30.77	Least Tern	<i>Sterna antillarum</i>	T	
411	Pine flatwoods	60.36	85.72	18.28	3.24	4.81	172.41	Eastern Indigo Snake	<i>Drymarchon corais couperi</i>	T	T
								Gopher Tortoise	<i>Gopherus polyphemus</i>	T	
								Gopher Frog	<i>Rana capito</i>	SSC	
								Southeastern American Kestrel	<i>Falco sparverius paulus</i>		
								Red-cockaded Woodpecker	<i>Picoides borealis</i>	SSC	E
								Florida Black Bear	<i>Ursus americanus floridanus</i>	T	
								Florida Panther	<i>Felis concolor coryi</i>	E	E
								Big Cypress Fox	<i>Sciurus niger avicennia</i>	T	
								Squirrel	<i>Burmannia flava</i>	E	
								Fakahatchee Burmannia	<i>Chrysophyllum olivaeforme</i>	T	
422	Brazilian pepper					0.39	0.39	Satin Leaf	<i>Deeringothamnus pulchellus</i>	E	E
4289	Cabbage palm/ disturbed					2.64	2.64	Beautiful Paw Paw	<i>Zamia floridana</i>		
								Coontie ¹			

¹ Listed by Lee County.

27

Table 9-1 FLUCFCS Table (continued)											
FLUCFCS code	Description	Percent cover by exotic/nuisance plant species					Acreage	Potential listed species per FLUCFCS code			
		<5%	5-24% (a)	25-49% (b)	50-74% (c)	>75% (d)		Common name	Scientific name	Listed Status	
										State	Federal
6318	Wax Myrtle/Willow ,Hydric	25.90	24.96	59.80	2.16		112.82	American Alligator Gopher Frog Limpkin Wood Stork Florida Panther Everglades Mink Florida Black Bear	Alligator mississippiensis Rana areolata Aramus guarauna Mycteria americana Felis Concolor coryi Mustela vison evergladensis Ursus americanus floridanus		
6319	Wax Myrtle/Willow , Hydric, Disturbed	7.30		23.49	25.22		56.01	American Alligator Gopher Frog Limpkin Wood Stork Florida Panther Everglades Mink Florida Black Bear	Alligator mississippiensis Rana areolata Aramus guarauna Mycteria americana Felis Concolor coryi Mustela vison evergladensis Ursus americanus floridanus		
641	Freshwater marsh	70.26	3.84	6.22			80.32	Little Blue Heron Snowy Egret Tricolored Heron Reddish Egret Wood Stork Everglades Mink Snail Kite Florida Sandhill Crane Limpkin American Alligator	<i>Egretta caerulea</i> <i>Egretta thula</i> <i>Egretta tricolor</i> <i>Egretta rufescens</i> <i>Mycteria Americana</i> <i>Mustela vison evergladensis</i> <i>Rostrhamus sociabilis plumbeus</i> <i>Grus canadensis pratensis</i> <i>Aramus guarauna</i> <i>Alligator mississippiensis</i>	SSC SSC SSC SSC E T E T SSC SSC	 E E

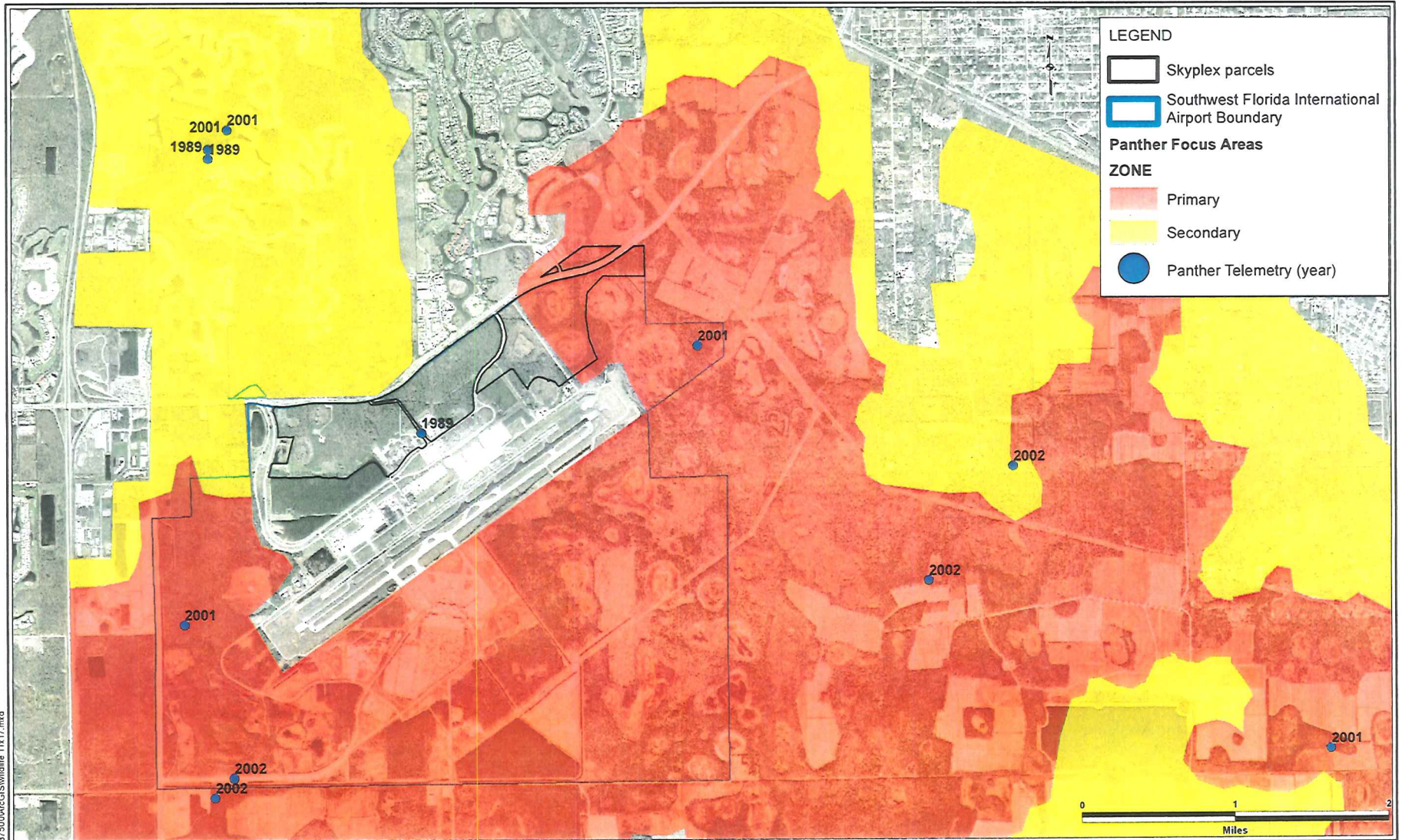
Table 9-1 FLUCFCS Table (continued)											
FLUCFCS code	Description	Percent cover by exotic/nuisance plant species					Acreage	Potential listed species per FLUCFCS code			
		<5%	5-24% (a)	25-49% (b)	50-74% (c)	>75% (d)		Common name	Scientific name	Listed Status	
										State	Federal
643	Wet Prairie	1.45	3.33		0.15		4.93	Little Blue Heron	<i>Egretta caerulea</i>	SSC	E
								Snowy Egret	<i>Egretta thula</i>	SSC	
								Tricolored Heron	<i>Egretta tricolor</i>	SSC	
								Reddish Egret	<i>Egretta rufescens</i>	SSC	
								Wood Stork	<i>Mycteria americana</i>	E	
								Everglades Mink	<i>Mustela vison evergladensis</i>	T	
								Snail Kite	<i>Rostrhamus sociabilis</i>	E	E
								Florida Sandhill Crane	<i>Grus canadensis pratensis</i>	T	
								Limpkin	<i>Aramus guarauna</i>	SSC	
								American Alligator	<i>Alligator mississippiensis</i>	SSC	
								Roseate Spoonbill	<i>Ajaja ajaja</i>	SSC	
								American Crocodile	<i>Crocodylus acutus</i>	E	T
742	Borrow areas						6.06				
748	Maintained grass field						60.21				
811	Airport						45.44				
814	Roads, access areas						13.15				
TOTAL							703.77				

List of Abbreviations:

E = Endangered

T = Threatened

SSC = Species of Special Concern



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Florida Panther Habitat Map

DATE	PROJECT NO.	FILE NO.	SCALE	SHEET
Aug. 2010	20097500	-	As Shown	9-1

10.0 FEDERAL AVIATION ADMINISTRATION AND HAZARDOUS WILDLIFE REQUIREMENTS

Wildlife at airports can be a hazard to aircraft operations. A wildlife hazard to aircraft operations is defined as a potential for a damaging aircraft collision with wildlife on or near an airport. Not all wildlife species are equally hazardous to aircraft operation. The ability of wildlife to be hazardous is dependent on their size, numbers, and behavior. Utilizing the National Wildlife Strike Database a list of the top 25 most hazardous wildlife species groups has been developed. This list is found in the Federal Aviation Administration (FAA) Advisory Circular (AC) 150/5200-33B, Hazardous Wildlife Attractants On or Near Airports.

RSW holds an Airport Operating Certificate issued under Title 14 Code of Federal Regulations (CFR) Part 139. This certificate requires the airport to comply with Part 139 in operating the airport, and that includes meeting requirements for managing wildlife hazards. Advisory Circular 150/5200-33B provides airports with guidance on certain land uses that have the potential to attract hazardous wildlife on or near public-use airports. It also discusses airport development projects (including airport construction, expansion, and renovation) affecting aircraft movement near hazardous wildlife attractants. Certificated airports may use the standards, practices, and recommendations contained in this AC to comply with the wildlife hazard management requirements of Part 139. Airports that have received Federal grant-in-aid assistance must use the standards in this AC. The AC lists land-use practices having the potential to attract hazardous wildlife and threaten aviation safety; these include but are not limited to:

- waste disposal operations,
- stormwater and wastewater treatment facilities,
- wetlands,
- dredge spoil containment areas,
- agricultural activities,
- golf courses,
- and landscaping.

The FAA specifically recommends with regard to stormwater management, that such new facilities on airports be designed as steep-sided, rip-rap lined, narrow, linearly shaped water

detention basins, to facilitate the control of hazardous wildlife and prevent the creation of new attractants.

There is also a FAA Certalert (No. 06-07) that addresses requests by state wildlife agencies to facilitate and encourage habitat for state-listed threatened and endangered species and species of special concern on airports. This guidance is specifically for state-listed species. The Certalert states that the airport operator must decline to adopt habitat management techniques for the benefit of state-listed species that could jeopardize aviation safety. Based on this Certalert, the airport should not allow mitigation for impacts to state-listed species and their habitat to occur on airport property if it is to result in a direct or indirect safety hazard.

The LCPA, in compliance with AC 150/5200-33B, has developed two landscape lists to be utilized at RSW as guidance in planning and reviewing future projects on and surrounding the airport. There is a compatible species list recommending native species that are typically not attractive to wildlife and can be utilized in landscaping. The incompatible species list includes native plant species that provide significant food and/or cover for wildlife and should be avoided for landscaping projects on and near the airport. The lists were developed with assistance from a qualified airport wildlife damage management biologist.

For the reasons outlined above, new development within the project site should be planned in accordance with AC 150/5200-33B in order to avoid the creation of new hazardous wildlife attractants on airport property. In addition, mitigation for wetland and protected species impacts should not take place on or near airport property.

**HISTORIC RESOURCE ANALYSIS
DESKTOP ANALYSIS
SOUTHWEST FLORIDA INTERNATIONAL AIRPORT
LEE COUNTY, FLORIDA**

Prepared for:

JOHNSON ENGINEERING, INC.
2122 Johnson Street
Fort Myers, Florida 33901

On behalf of:

LEE COUNTY PORT AUTHORITY
11000 Terminal Access Road
Fort Myers, Florida 33913

Prepared by:

ARCHAEOLOGICAL CONSULTANTS, INC.
8110 Blaikie Court Suite A
Sarasota, Florida 34240

Project Manager – Marion Almy
Project Archaeologist- Lee Hutchinson

MARCH 2010

**CULTURAL RESOURCE ASSESSMENT
DESKTOP ANALYSIS
SOUTHWEST FLORIDA INTERNATIONAL AIRPORT
LEE COUNTY, FLORIDA**

Prepared for:

**Johnson Engineering, Inc.
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On behalf of:

**Lee County Port Authority
11000 Terminal Access Road
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Prepared by:



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March 2010

**CULTURAL RESOURCE ASSESSMENT
DESKTOP ANALYSIS
SOUTHWEST FLORIDA INTERNATIONAL AIRPORT
LEE COUNTY, FLORIDA**

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Prepared by:

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**Project Manager - Marion Almy
Project Archaeologist - Lee Hutchinson**

March 2010

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Executive Summary

A desktop analysis was conducted by Archaeological Consultants, Inc. (ACI) for approximately 700 acres of the Southwest Florida International Airport (RSW) in order to satisfy the requirements of Lee County's Comprehensive Plan Amendment Application. Specifically, IV.D of the application, Impacts on Historic Resources, requires the following to demonstrate compliance associated with cultural, historical, and archaeological resources impacts: 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. Included with this analysis should be the following: 1) Map of historic districts or sites listed on the Florida Master Site File (FMSF) located on the subject property or adjacent properties and 2) Map showing the subject property location on the Archaeological Sensitivity Map for Lee County. This is in keeping with Chapter IX, Historic Preservation, of the Lee County Comprehensive Plan.

Based on background research, including predictive models, and previously conducted cultural resource assessment surveys (CRAS) of portions of the RSW Subject property, there are no significant cultural resources within or adjacent to the project area. Based on these data, it is the opinion of ACI that the proposed activities will have no impact on any significant cultural resources, including archaeological sites or historic resources which are listed, determined eligible, or considered potentially eligible for listing in the National Register of Historic Places (NRHP). Thus, no field investigations are recommended.

Introduction

This desktop analysis for the RSW Comprehensive Plan Amendment was conducted on behalf of the Lee County Port Authority in order to satisfy the requirements of Lee County's Comprehensive Plan Amendment Application. The Southwest Florida International Airport Layout Plan currently indicates the northern area labeled as Non-Aviation Support containing approximately 842 acres for non-aviation uses such as hotel, light industrial, ancillary retail/shopping, and office. The Lee Plan currently allows 100 acres of development in this area. The Port Authority seeks a comprehensive plan amendment to update the land area allowed for development and the parameters in the Development Schedule to accommodate additional future non-aviation uses (Johnson Engineering, Inc. 2010).

The project is located in Section 24, Township 45 South, Range 25 East and Sections 17, 18, 19, and 20, Township 45 South, Range 26 East in Lee County, Florida (Figure 1; United States Geological Survey [USGS] 1958a, 1958b). The project area is located south of Daniels Parkway and north of the airport; I-75 is approximately 1.25 miles (mi) to the west.

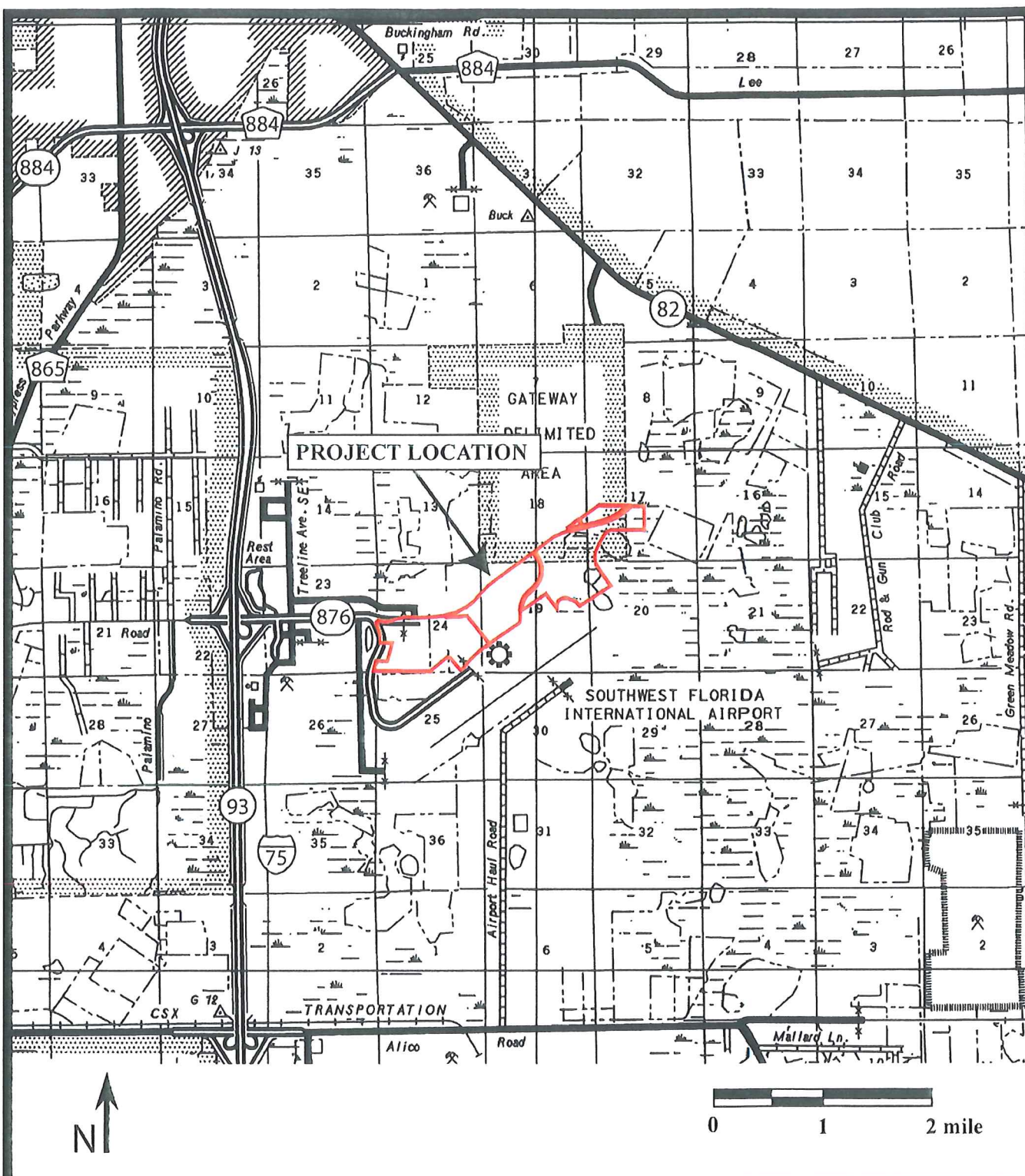


Figure 1. RSW Subject Project Location, Lee County, Township 45 South, Range 25 East, Section 24; Township 45 South, Range 26 East, Sections 17, 18, 19 and 20 (State Mapping Office 1989).



Environmental Setting

The RSW Subject project area has a general elevation of 25 feet (ft) above mean sea level (amsl) (Figure 2). Soils within the project area are characterized by the Oldsmar-Malabar-Immokalee soil association which are nearly level, poorly drained deep sandy soils on flatwoods and in sloughs on the flatwoods (United States Department of Agriculture [USDA] 1984:7). Natural vegetation consists of South Florida slash pine, sawpalmetto, pineland threeawn, and cypress and maidencane in the wetter areas. Specific soils found within the project area, including their drainage characteristics, are noted in Table 1. Fresh water in and around the project area includes seasonal depressions, marshes, and ponds.

Table 1. Soils and drainage characteristics within the RSW Subject project area.

SOIL TYPE	DRAINAGE CHARACTERISTICS
Anclote sand, depressional	very poorly drained
Boca fine sand	poorly drained
Felda fine sand	poorly drained
Felda fine sand, depressional	very poorly drained
Hallandale fine sand	poorly drained
Immokalee sand	poorly drained
Malabar fine sand	poorly drained
Myakka fine sand, depressional	very poorly drained
Oldsmar sand	poorly drained
Pineda fine sand	poorly drained
Pineda fine sand, depressional	very poorly drained
Pompano fine sand	poorly drained
Pompano fine sand, depressional	very poorly drained

Background Research and Literature Review

A review of the archaeological and historical literature, records, and other documents and data pertaining to the general area was conducted. The focus of this research was to ascertain the types of cultural resources known in the project vicinity, their temporal/cultural affiliations, site location information, and other relevant data. This included a review of sites listed in the NRHP, the FMSF, the Lee County local register of historic places, the Lee County Historic Sites Survey (Piper Archaeological Research, Inc. 1986), and the Archaeological Site Inventory and Zone Management Plan for Lee County (Austin 1987). In addition, other materials reviewed were CRAS reports, Lee County Property Appraiser data, USDA soil survey data (USDA 1984), United States Geological Survey (USGS) quadrangle maps (USGS 1958a, 1958b), 19th Century federal surveyors' Plats and field notes, tract book records (State of Florida 1872, 1973a, 1873b, 1873c, n.d.a, b), historic aerials on file with the Publication of Archival Library and Museum Materials (PALMM; 1944, 1958) published books and articles, unpublished manuscripts, maps, and materials on file at ACI.

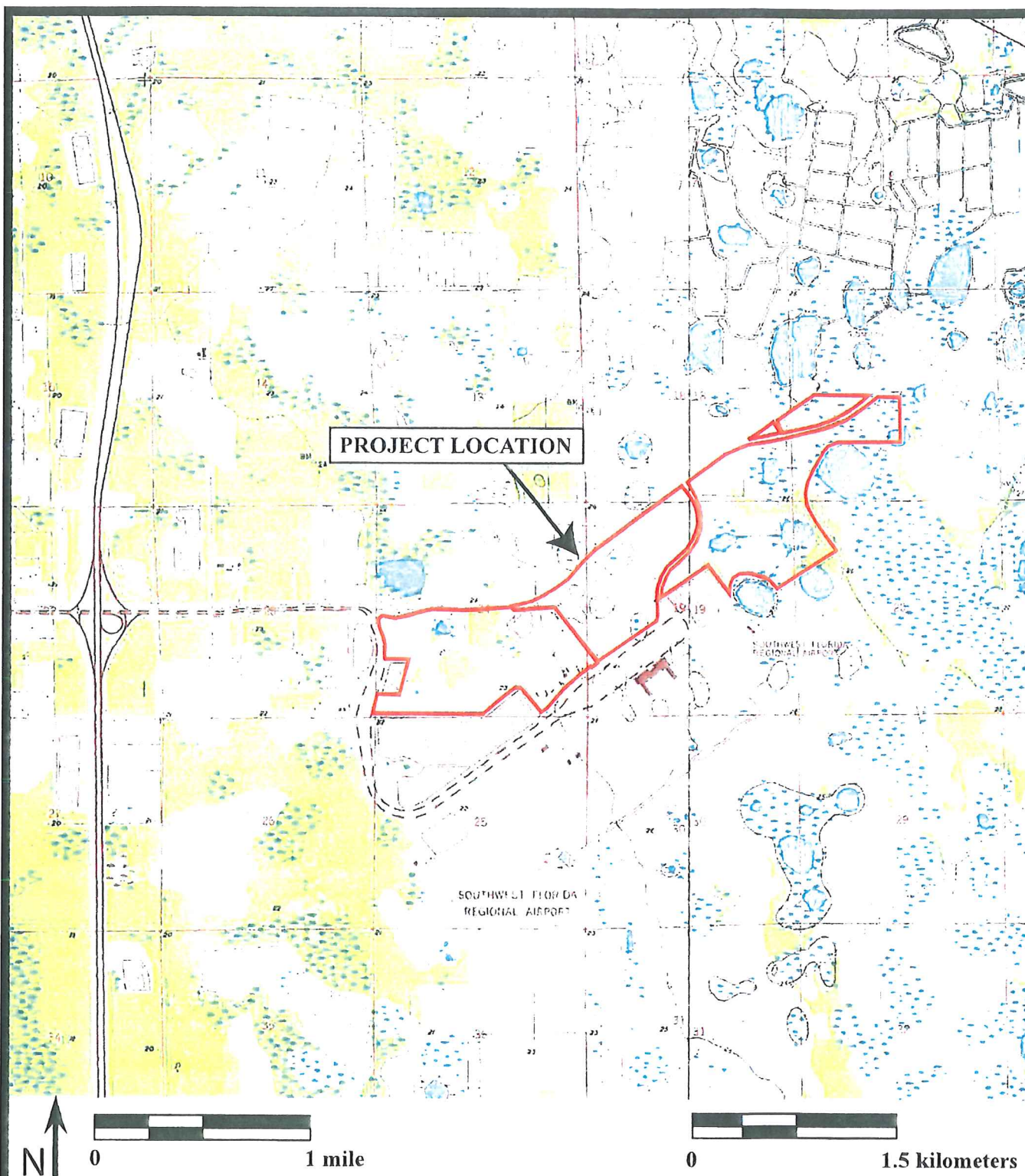


Figure 2. Environmental Setting of the RSW Subject Project Area, Lee County, Township 45 South, Range 25 East, Section 24; Township 45 South, Range 26 East, Sections 17, 18, 19 and 20 (USGS 1974 Alva SW LABINS mrg2114.tif; 1973 Fort Myers SE LABINS mrg2115.tif).



The FMSF data utilized in this analysis were obtained in February 2010 though may not reflect all recorded resources as according to FMSF staff, input may be a month or more behind receipt of reports and site files. In addition, the GIS data are updated on a quarterly basis.

Archaeological and Historical Considerations

The archaeological background research indicated that no prehistoric sites are recorded within the project area. However, two prehistoric and five historic sites have been recorded within 2 mi of the RSW Subject project (Figure 3). The two prehistoric sites (8LL2048 and 8LL2049) consist of one lithic scatter and one midden/campsite found during a survey of the Arborwood Parcel situated to the north of the project area (Beriault 2003a). The lithic scatter was determined not eligible for listing in the NRPH by the State Historic Preservation Office (SHPO) and there was insufficient information to make a determination for the midden. The five historic sites, 8LL2406-8LL2410, located to the northeast along S.R. 82, comprise the Buckingham Army Airfield Gunnery Range Resource Group which consists of four gunnery ranges. These were recorded during a survey of the Bennett Property (Janus Research 2005, 2006). Three of these resources were considered NRHP eligible by the SHPO and the remaining two were ineligible.

In addition to the surveys mentioned above, several additional cultural resource assessment surveys have been conducted in the project vicinity and a few of the airport property itself (Carr 1976; Janus Research 1992). These surveys are noted in Table 2. As a result of these surveys, no sites were discovered within or near the RSW Subject project. In addition, the predictive model developed for Lee County noted that the environmental setting in which the RSW Subject property is situated did not rank high in terms of archaeological potential (Austin 1987).

Table 2. Cultural resource assessment surveys conducted within and near the RSW Subject project area.

SURVEY	AUTHOR	DATE
Southwest Florida Regional Airport Tract	Carr	1976
Gateway DRI Tract	Almy	1985
Southwest Florida Pipeline Corridor	Estabrook et al.	1991
Proposed Runway Extension Areas for the Southwest Florida Regional Airport	Janus Research	1992
Daniels Road Roadway Transfer	ACI	2003
Bechard Parcel	Beriault	2003b
Arborwood-Worthington Cell Tower	Ambrosino	2004
Fort Myers Airport Cell Tower	Panamerican	2004
FPL 230 Kv Transmission Line	Schofield	2005
I-75 Ponds, S. of Lockett Road to SR 82	ACI	2006
SR 82	Janus Research	2007
Crown Castle USA-Gateway Cell Tower	Keith	2007

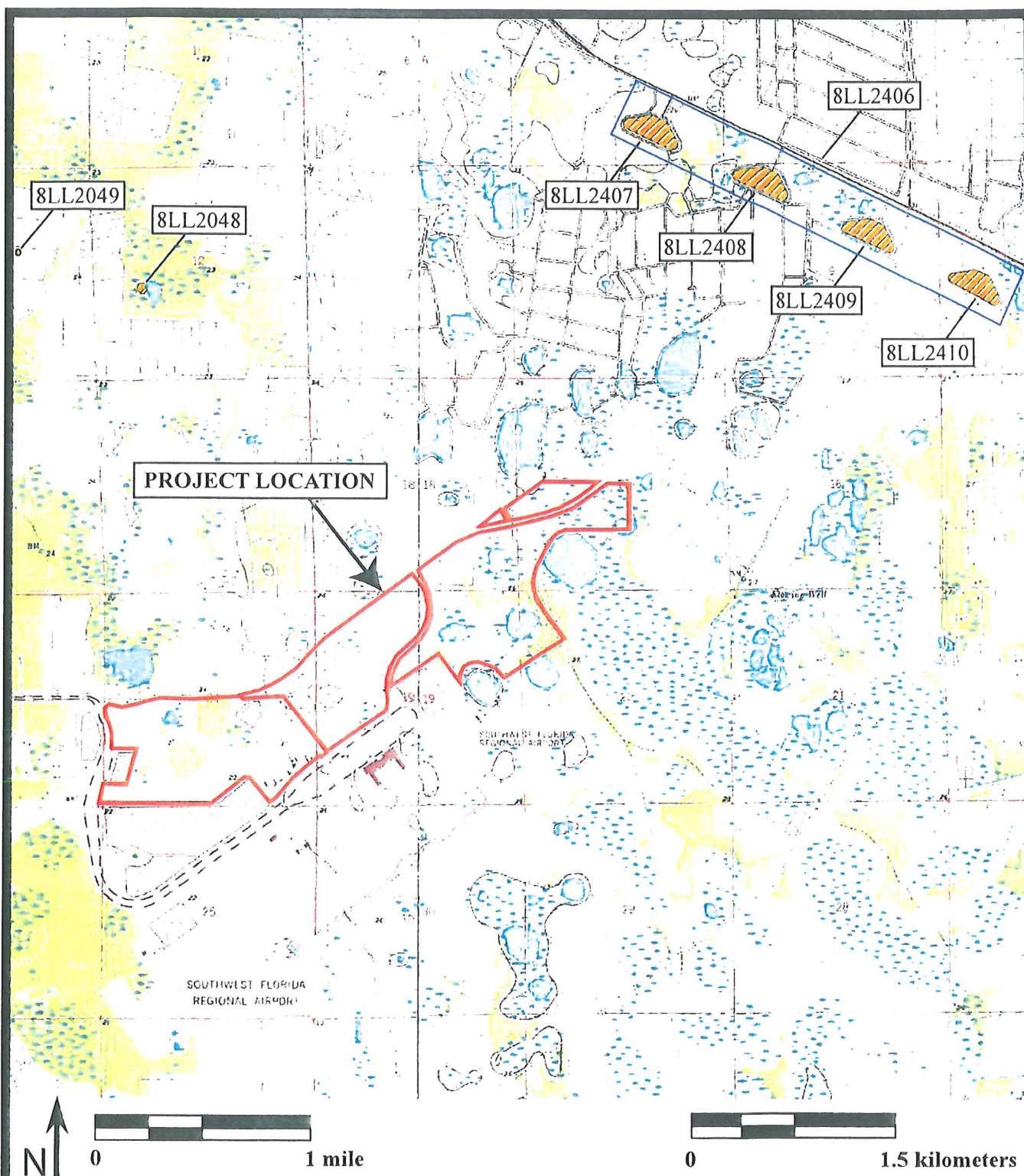


Figure 3. Previously recorded archaeological sites within two miles of the RSW Subject Project Area, Lee County, Township 45 South, Range 25 East, Section 24; Township 45 South, Range 26 East, Sections 17, 18, 19 and 20 (USGS 1974 Alva SW LABINS mrg2114.tif; 1973 Fort Myers SE LABINS mrg2115.tif).



More specifically, as archaeologists have long realized, aboriginal populations did not select their habitation sites and special use activity areas in a random fashion. Rather, many environmental factors had a direct influence upon site location selection. Among these variables are soil drainage, distance to freshwater, relative topography, proximity to food and other resources including stone and clay. The Archaeological Site Inventory and Zone Management Plan for Lee County, Florida (Austin 1987) lists the following environmental factors of significance:

- The presence of potable freshwater for humans and animals, particularly rivers, streams, springs, sloughs, and hardwood swamps;
- The presence of major rivers, streams, and slough systems that may have functioned as transportation routes;
- Better drained soils relative to surrounding soils, particularly when located near a freshwater source;
- Higher elevation relative to the surrounding terrain, particularly when located near a freshwater source;
- The presence of oak/palm hammocks or tree islands in or adjacent to a pond, marsh, swamp, or slough system;
- In coastal areas, the presence of lagoons, embayments, estuaries, or bayous particularly when oak/palm hammocks are present;
- Any small offshore island or key

In applying these known site location predictive factors, the project area has been evaluated as having a low prehistoric site potential. The western most portion of the project area is situated adjacent to Archaeological Sensitivity Area 2 (Figure 4). However, all but the eastern most portions of the project area have been previously surveyed (Carr 1976; Janus Research 1992) and resulted in negative archaeological results.

The potential for yet unrecorded historic period archaeological sites was also assessed. This involved a review of historical documents and literature, including the 19th century federal surveyor's plats and field notes. The exterior boundaries of Township 45 South, Ranges 25 and 26 East were surveyed in 1872 by W. L. Apthorp and the interior section lines were surveyed the following year by M. H. Clay (State of Florida 1873b; 1873c). Apthorp described that land along the township line as 3rd rate pineland, ponds, and wet prairie (State of Florida 1872:102-103). The general project area, as described by Clay, consisted of pine saplings, cypress ponds, and cypress swamp. In addition, he noted a southeastwardly trending road crossing through Section 9, to the northeast of the project area (State of Florida 1873a). This is depicted on the plat (Township 45 South, Range 26 East) as the "South East Road from Fort Myers," which roughly follows the route of S.R. 82 today (State of Florida 1873b, 1873c). No other historic features are noted proximate to the project area. Those buying property in the project area consisted of investors as opposed to settlers. Section 24, Township 45 South, Range 25 East was purchased in its entirety by the Silver Springs, Ocala, and Gulf Railway Company in March 1888. All of Sections 18 and 20 of Township 45 South, Range 26 East were purchased by the Florida

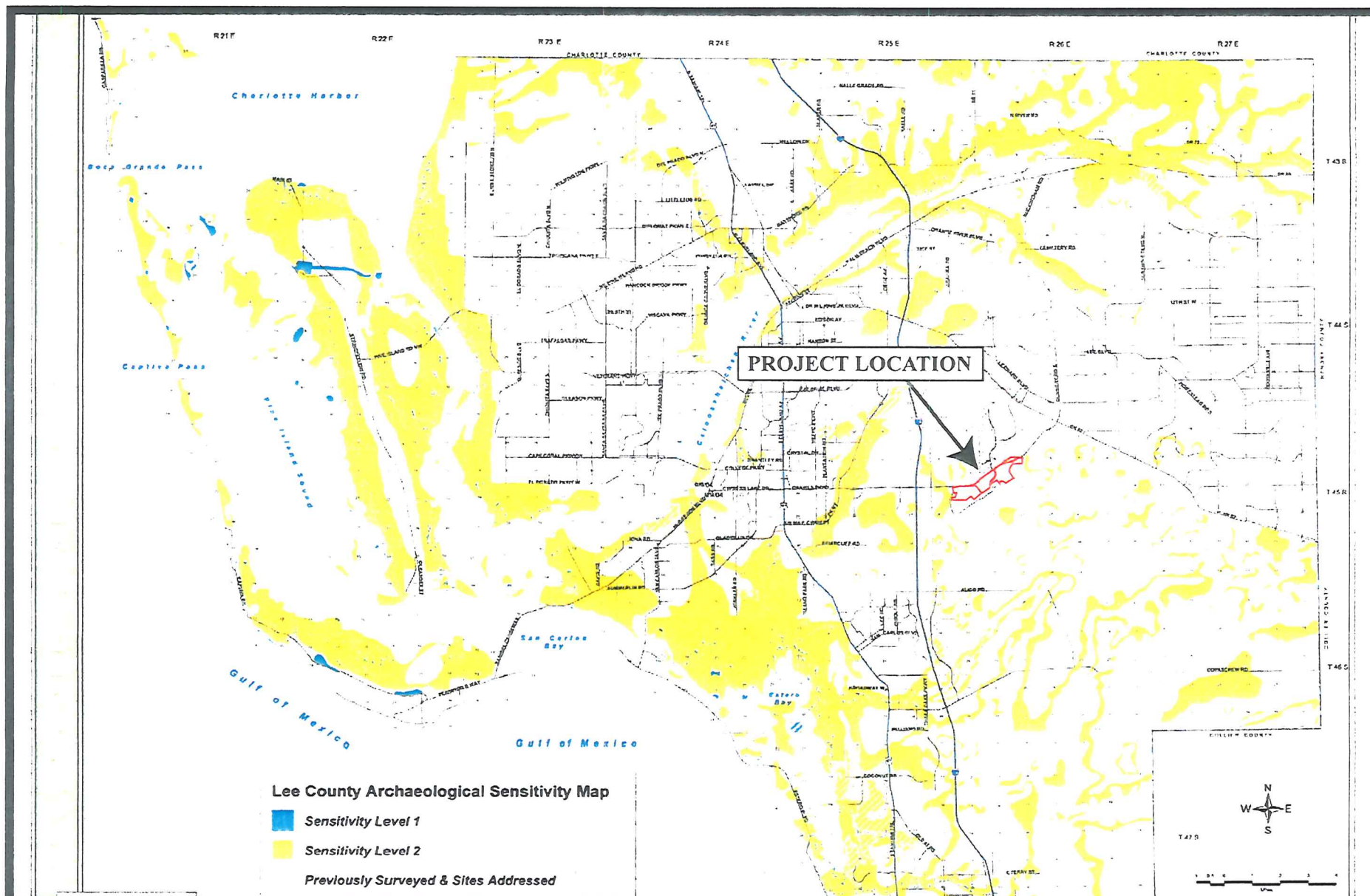


Figure 4. RSW Subject Project Area overlain on the Lee County Archaeological Sensitivity Map. Lee County, Township 45 South, Range 25 East, Section 24; Township 45 South, Range 26 East, Sections 17, 18, 19 and 20 (Lee County GIS October 2004).



Commercial Company in 1886 while the Atlantic Gulf Coast Canal and Okeechobee Land Company bought all of Sections 17 and 19 in 1884 (State of Florida n.d.a and b).

Examination of the NRHP, the FMSF, the Lee County local register of historic places, the Lee County Historic Sites Survey (Piper Archaeological Research 1986), and the Lee County Property Appraisers data, indicated that no historic buildings were recorded near or within the project area. In addition, a review of the 1944 and 1958 historic aerials of the area (PALMM 1944, 1958) did not show any structures to have been located within the project area. The aerials did show many wetland features as well as areas of land that had been subjected to agriculture. Thus, any proposed construction will have no effect on any historic resources.

Conclusions

Background research revealed no previously recorded historic or prehistoric archaeological sites or historic structures, and no portion of the project area is situated within any of the Archaeological Sensitivity Areas. In addition, all but the eastern most portions of the project area have been previously surveyed (Carr 1976; Janus Research 1992) and resulted in negative results.

As a result, it is the opinion of ACI that there is no potential for discovering significant prehistoric or historic archaeological sites within the project area. Therefore, the proposed activities will have no impact on any significant cultural resources, including archaeological sites and historic resources, which are listed, determined eligible, or considered potentially eligible for listing in the NRHP. No further investigations are warranted.

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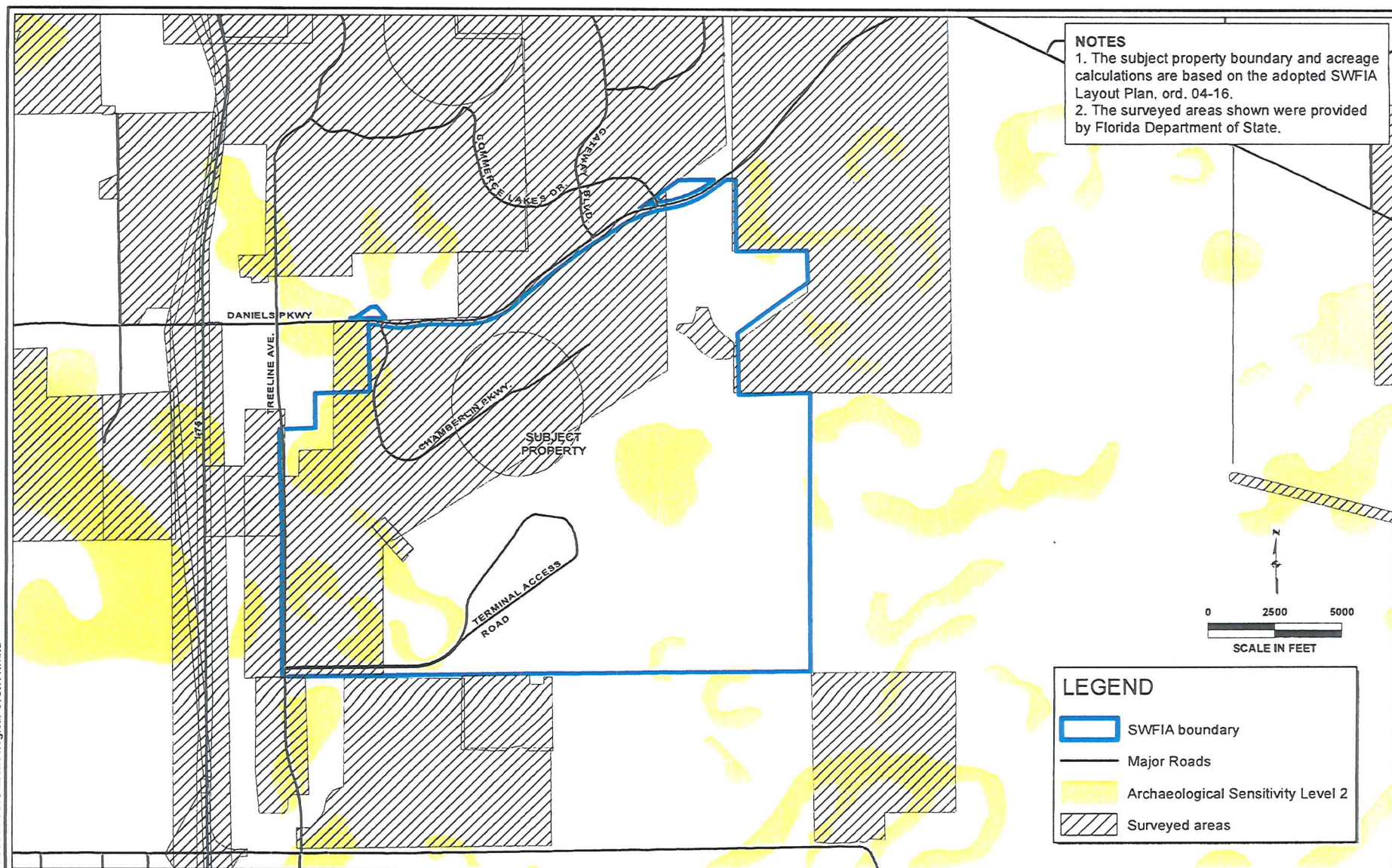
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Historical and Archeological Sensitivity

DATE	PROJECT NO.	FILE NO.	SCALE	SHEET
April 2010	20087500	-	As Shown	IV.D.2

Exhibit IV.E.
INTERNAL CONSISTENCY WITH THE LEE PLAN
for
RSW COMPREHENSIVE PLAN AMENDMENT

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.

The proposed text amendments involve a change to Policy 1.2.7 to allow additional commercial, light industrial, hotel, and office uses through the 2030 planning horizon at Southwest Florida International Airport. The requested non-aviation development is consistent with the applicable Airport Future Land Use designation, the adopted Southwest Florida International Airport Master Plan ("SWFIA Master Plan"), and the adopted Airport Layout Plan. The proposal does not affect established Lee County population projections and does not affect the total population capacity of the Lee Plan Future Land Use Map.

The subject property is located within the Gateway/Airport Planning Community. Table 1(b), as amended by Ordinance 09-16, indicates that 1,100 acres of Commercial land; 3,100 acres of Industrial land; and 7,500 acres of Public land is allocated in the Gateway/Airport Planning Community. The proposed additional development of lands designated as non-aviation uses on the adopted Airport Layout Plan will occur on public land owned by Lee County and operated by the Lee County Port Authority. The utilization of this public land consistent with the adopted Land Use designation is consistent with and will not affect the land areas allocated in the Gateway/Airport Planning Community.

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.

The subject property is currently designated Airport on the Lee Plan, Future Land Use Map. A Comprehensive Plan Amendment incorporating the SWFIA Master Plan and Airport Layout Plan into the Lee Plan was approved by the Board of County Commissioners through adoption of Ordinance 04-16. Those amended portions of the Lee Plan relevant to this application are included and discussed below.

GOAL 1: FUTURE LAND USE MAP. To maintain and enforce a Future Land Use Map showing the proposed distribution, location, and extent of future land uses by type, density, and intensity in order to protect natural and man-made resources, provide essential services in a cost-effective manner, and discourage urban sprawl. (Amended by Ordinance No. 94-30).

OBJECTIVE 1.2: SOUTHWEST FLORIDA INTERNATIONAL AIRPORT AND PAGE FIELD GENERAL AVIATION AIRPORT AREAS. Designate on the Future Land Use Map adequate land in appropriate locations to accommodate the projected growth needs of the Southwest Florida International Airport and the business and industrial areas related to it, as well as research and development activities and other non-aviation related development that is not necessarily related to the airport, through the year 2030. Designate on the Future Land Use Map existing and proposed development areas for Page Field General Aviation Airport. The Lee County Port Authority desires to establish non-aviation related uses to provide a supplementary revenue source as well as providing an opportunity for businesses that desire a location on airport property. Designate on the respective Airport Layout Plans suitable areas to accommodate these desired uses and provide general policy guidance as to how these uses will be developed. These categories are also considered Future Urban Areas. (Amended by Ordinance No. 94-30, 02-02, 04-16, 07-12, 09-14).

POLICY 1.2.1: Airport Lands includes the existing facility and projected growth areas for the Southwest Florida International Airport and Page Field General Aviation Airport through the year 2030. The Airport Lands comprising the Southwest Florida International Airport includes airport and airport-related development as well as non-aviation land uses as proposed in the approved 2003 Airport Master Plan update and as depicted on the Airport Layout Plan sheet (Map 3F) and the Southwest Florida International Airport Proposed Development Schedule (Table 5(a)). This mix of uses is intended to support the continued development of the Southwest Florida International Airport. Future development at the Southwest Florida International Airport will also include non-aviation related land uses such as hotels/motels, light industrial, service stations, ancillary retail/shopping, and office development. Any future airport expansion or development of aviation-related and non-aviation uses at Southwest Florida International Airport will offset environmental impacts through the Airport Mitigation Lands Overlay (Map 3M) or other appropriate mitigation acceptable to the permitting agencies and to Lee County. The physical design of the airport expansion will minimize any degradation of the

recharge capability of land being developed. Airport expansion beyond the present boundaries will be subject to necessary amendments to the Lee Plan.

All development on Airport Lands comprising Southwest Florida International Airport must be consistent with Map 3F and Table 5(a). Map 3F depicts the planned expansion of the Southwest Florida International Airport through 2020.

Future development on Airport Lands comprising Page Field General Aviation Airport must be consistent with Objective 1.9 and related policies as well as Map 3G and Table 5(b).

If the airport master planning process precipitates a substantive change to the Airport Layout Plan (Map 3F or Map 3G), then the Port Authority must amend Map 3F or Map 3G, as appropriate, prior to obtaining local development approval. The non-aviation related development areas have been depicted on the approved Airport Layout Plan sheets (Maps 3F and 3G). These uses will be constructed upon Airport lands with long term leases.

All development within the non-aviation land use areas will be subject to mitigation requirements for wetland impacts. Mitigation of wetland impacts will be in accordance with the U.S. Army Corps of Engineers and South Florida Water Management District requirements. To the greatest extent reasonably possible, development of non-aviation land use areas must avoid wetland impacts. All non-aviation land use development will meet the indigenous vegetation requirements set forth in the Lee County Land Development Code. (Amended by Ordinance No. 94-30, 00-22, 04-16, 07-12, 09-14).

POLICY 1.2.3: Airport Noise Zones are subject to varying levels of airport-related noise; see Policy 1.7.1 for details of these overlay zones.

POLICY 1.2.4: The Airport AOPD zoning resolution must be amended before any non-aviation related uses can be developed at the Southwest Florida International Airport. The intensity of the proposed aviation and non-aviation land uses at Southwest Florida International Airport must be consistent with Lee Plan Table 5(a). The Page Field General Aviation Airport project must be rezoned to AOPD prior to development of the new non-aviation uses proposed in Map 3G and Table 5(b). (Added by Ordinance No. 04-16, Amended by Ordinance No. 09-14).

POLICY 1.2.5: Map 3F, as currently incorporated into the Lee Plan, includes transportation improvements that exceed those shown on the balance of the Transportation Map series. The direct access improvements to I-75 depicted on Map 3F, which are being pursued by the Port Authority to benefit the midfield terminal, include and interchange at I-75 and grade separation at Treeline Avenue/Ben Hill Griffin Parkway. These future improvements are the Port Authority's desired access to the airport. The Port Authority will be responsible for achieving consistency between Map 3F and the balance of the Transportation Map Series concerning access to I-75. The Port

Authority will serve as the lead agency for achieving direct access to I-75. (Added by Ordinance No. 04-16)

POLICY 1.2.6: Any future airport expansion or development of aviation-related uses or non-aviation related uses will provide appropriate buffer areas, as determined by Lee County, for the protection of groundwater resources in the Southeast and Northeast quadrants of the airport property. (Added by Ordinance No. 04-16)

POLICY 1.2.7: Future non-aviation areas depicted on the Airport Layout Plan (Map 3F) will be developed, to the greatest extent possible, only within existing upland areas. Impacts to wetlands in the future non-aviation areas will be minimized by site design, wherever possible, in compliance with the Lee County Land Development Code. Development within the future non-aviation area, as designated on Map 3F, is limited to a total of 100 acres. Development of additional acreage will require prior Lee Plan amendment approval. (Added by Ordinance No. 04-16)

RESPONSE: The proposed comprehensive plan amendment request is consistent with this Goal, and supporting Objective and Policies with the exception of the proposed amendment to Policy 1.2.7.

The property is designated Airport Lands on the Future Land Use Map. Airport Lands include the existing and projected growth areas for SWFIA through the year 2030. Per Policy 1.2.1, future development at SWFIA will include non-aviation related land uses such as hotels/motels, light industrial, service stations, ancillary retail/shopping, and office development. The market analysis performed to support this request indicates the appropriate level of these non-aviation uses on the subject property through the year 2030. According to these market analysis findings, an amendment is requested to the 100-acre limit for non-aviation development in Policy 1.2.7 and amendment to the development schedule to increase square feet of non-aviation development through 2030.

The areas for non-aviation development are depicted per the Airport Layout Plan (Map 3F) and the proposed text change will allow for 300 acres of non-aviation development in designated non-aviation land use areas consistent with the adopted Airport Layout Plan.

This comprehensive plan amendment request includes supporting documentation to justify additional non-aviation development potential on designated non-aviation lands, and is being submitted pursuant to the dictates of Policy 1.2.7 of the Lee Plan, to obtain prior Lee Plan amendment approval for development of additional acreage within non-aviation land areas. The acreage is determined based on the Floor Area Ratio calculated for the approved development through 2020. Approximately 435,800 square feet of development is currently approved through 2020 on 100 acres of land (0.10 FAR), and the proposed additional 1,017,950 square feet of development (including 125,000 square feet calculated for 187 hotel rooms) through 2030 is proposed on 200 acres of land (FAR 0.12).

OBJECTIVE 1.7: SPECIAL TREATMENT AREAS. Designate on the Future Land Use Map, as overlays, special treatment areas that contain special restrictions or allowances in addition to all of the requirements of their underlying categories.

POLICY 1.7.1: The Airport Noise Zones cover areas subject to varying levels of airport-related noise. By 2006 and every 5 years thereafter, the Port Authority will update the aviation forecasts and associated noise contours for the Southwest Florida International Airport and initiate an amendment to the Airport Noise Zone Overlay Map to reflect the findings of this study. In addition to meeting the requirements of the underlying Future Land Use Map categories, properties within the Noise Zone Overlay must meet the following:

Airport Noise Zone A is limited to uses that are compatible with airports and air commerce, including but not limited to those necessary to provide services and convenience goods to airline passengers, those generally associated with airport operation, and related development.

...

RESPONSE: The amendments seek to increase allowable acreage and square feet of development within the non-aviation area as depicted on the adopted Airport Layout Plan (Map 3F). The Port Authority will ensure consistency with Policy 1.7.1 with uses that provide services and convenience goods to airline passengers, those generally associated with airport operation, and related development that is compatible with airports and air commerce.

GOAL 46: COORDINATED SYSTEM OF RAILWAYS, AVIATION, PORTS AND ROADS. Develop and maintain a coordinated system of railways, aviation, ports, roads, and related facilities to facilitate the safe and efficient movement of commerce, consistent with community values and economic objectives. (Amended by Ordinance No. 99-15)

OBJECTIVE 46.1: FUTURE LAND USES. The county will encourage the location of suitable commerce movement support facilities such as warehouses, cargo handling facilities, and transfer points at areas appropriately designated on the Future Land Use Map. (Amended by Ordinance No. 99-15)

RESPONSE: The proposed amendment increases potential warehouse/distribution development through 2030 consistent with the findings of the Market Analysis supporting this application. The proposed amendment to allow development of warehouse facilities in non-aviation use areas depicted on the SWFIA Airport Layout Plan fulfills Goal 46 and Objective 46.1.

GOAL 47: COORDINATED SYSTEM OF AVIATION FACILITIES. Develop and maintain a coordinated system of aviation facilities to facilitate the safe, cost effective

and efficient movement of commerce consistent with community values and economic objectives (Amended by Ordinance 99-15).

OBJECTIVE 47.1: ECONOMIC GROWTH. To aid in the diversification of the county's economic growth the capacity and long term development of the Southwest Florida International Airport and Page Field General Aviation Airport will be expanded in compliance with Maps 3F and 3G, and Table 5(a) and 5(b). Specific project implementation and approval of the proposed development will be coordinated through the annual Capital Improvement Program process and be consistent with the Airport Layout Plans (Map 3F and 3G). These expansions will be funded through user fees, airline contributions, and other funding sources not involving general county tax dollars. The Port Authority will strive to minimize impacts to surrounding land uses while maintaining a safe and efficient facility for airport operations. (Amended by Ordinance No. 98-09, 99-15, 04-16, 09-14)

POLICY 47.1.1: The Port Authority will coordinate the implementation of scheduled infrastructure and facility improvements for the Southwest Florida International Airport and Page Field General Aviation Airport consistent with the approved Airport Layout Plan sheets (Map 3F and Map 3G, respectively) and the Development Schedules (Table 5(a) and (b), respectively). (Amended by Ordinance No. 98-09, 99-15, 04-16, 09-14)

POLICY 47.1.2: The development potential of Southwest Florida International Airport will continue to be protected by the acquisition of additional land for runway and taxiway, road access, storm water management, and environmental mitigation use, consistent with the adopted Airport Master Plan and the Port Authority's Capital Improvement Program. (Amended by Ordinance No. 98-09, 99-15, 07-09)

POLICY 47.1.3: The Port Authority will continue to expand existing and proposed aviation facilities such as the terminal building, airport aprons, cargo facilities, roadways and parking in order to meet the forecasted demand. (Amended by Ordinance No. 98-09, 99-15, 04-16)

POLICY 47.1.4: The Port Authority will continue to investigate commercial and industrial potentials at Page Field and at Southwest Florida International Airport through market surveys and the solicitation and receipt of acceptable proposals for land lease at fair market value as well as efforts to cultivate appropriate public/private partnerships in pursuing this potential. (Amended by Ordinance No. 98-09, 07-09)

POLICY 47.1.5: The Port Authority will capitalize on its Port of Entry and Foreign Trade Zone status to encourage economic diversification. This will be accomplished by actively: (1) seeking to increase international commerce movement; (2) implementing an international marketing program designed to increase tourist activity; (3) continuing planning efforts to ensure availability of adequate airport facilities to accommodate increases in international air traffic; and, (4) pursuing development of international corporate activity. (Amended by Ordinance No. 99-15, 04-16)

POLICY 47.1.6: The Port Authority will maintain guidelines for the location, development, and operation of private aviation facilities that would add to Lee County's overall tax base. (Amended by Ordinance No. 99-15)

POLICY 47.1.7: The Port Authority will plan to accommodate growth at the existing facilities and provide for the development of future aviation facilities as warranted. (Amended by Ordinance No. 98-09, 99-15).

RESPONSE: This comprehensive plan amendment request is consistent with these Goals and supporting Objective and Policies. The development of Southwest Florida International Airport is planned to promote the safe, cost effective, and efficient movement of commerce. As an established, publicly owned airport, Southwest Florida International Airport continues to operate and grow in alignment with the adopted Airport Master Plan and the Lee Plan.

Southwest Florida International Airport is included in the Florida Aviation System Plan (which is updated on a continuous basis) and the National Plan of Integrated Airport Systems. The SWFIA Master Plan and Airport Layout Plan have been incorporated into the Lee Plan by adoption of Ordinance 04-16. This coordination facilitates the development of an aviation system that promotes the safe and efficient movement of commerce, consistent with community values and economic objectives.

Southwest Florida International Airport offers critical services that contribute to the vitality of Lee County. The Airport provides well-integrated, efficient, and direct commercial aviation services. Commercial aviation plays a vital role in the economic and transportation systems, offering opportunities for transportation of goods, and flying for business or personal reasons. Aviation activity forecasts reflect growth in the demand for the aviation services provided at Southwest Florida International Airport.

In addition to the aviation uses, land at Southwest Florida International Airport is designated for non-aviation uses. This non-aviation development promotes the financial independence of Southwest Florida International Airport and the LCPA, consistent with the policies contained in the Lee Plan. The purpose of this comprehensive plan amendment application is to update the non-aviation development anticipated and listed in the Development Schedule, Table 5(a). The projected demand for non-aviation uses has been analyzed through the year 2030 as provided in the Market Analysis accompanying this application. Per the Market Analysis, the Port Authority seeks to include the potential for the appropriate amount of non-aviation development on non-aviation designated lands through the year 2030.

OBJECTIVE 47.2: DEVELOPMENT COMPATIBILITY. The county and Port Authority will evaluate development proposals for property located within the vicinity of existing aviation facilities to ensure land use compatibility, to preclude obstructions to

aircraft operations, and to protect airport capacities. (Amended by Ordinance No. 99-15, 07-09)

POLICY 47.2.1: The Port Authority will coordinate efforts with aviation and other transportation interests at Southwest Florida International Airport to establish multi-modal transfer facilities. (Amended by Ordinance No. 99-15, 04-16)

POLICY 47.2.2: The county will coordinate with the Port Authority to ensure that regulations in the Lee County Land Development Code restrict land uses in areas covered by the Airport Noise Zones (ANZ) to those uses that are compatible with the operation of the airport. (Amended by Ordinance No. 99-15)

POLICY 47.2.3: Future updates of the Page Field and Southwest Florida International Airport Master Plans will monitor and incorporate development of non-aviation uses at the airports and suggest aviation-related uses as appropriate. (Amended by Ordinance No. 99-15, 04-16).

POLICY 47.2.4: To the greatest extent possible, future airport master plans will retain the long term aviation expansion capability and capacity at both Page Field Airport and the Southwest Florida International Airport. (Amended by Ordinance No. 99-15).

POLICY 47.2.5: The county will utilize the approved Airport Master Plans and FAR Part 150 Study, including updates, as a basis to amend the comprehensive land use plan and the land development code to prohibit development that is incompatible with the Southwest Florida International Airport or Page Field General Aviation Airport; and, to ensure future economic enhancement consistent with Objective 46.2. Future updates of the Southwest Florida International Airport Master Plan and Page Field General Aviation Airport Master Plan that precipitate substantive changes to the Airport Layout Plans (Map 3F and Map 3G, respectively) will require a Lee Plan Amendment prior to local permitting approval for the affected airport. In accordance with FAA requirements, the Southwest Florida International Airport Master Plan and corresponding Airport Layout Plan (Map 3F) will be comprehensively updated at least once every 5 to 8 years. (Amended by Ordinance No. 99-15, 04-16, 09-14)

POLICY 47.2.6: Through an interlocal agreement, the Port Authority and the City of Fort Myers will continue to coordinate the review of new land uses that have the potential to create tall structure obstructions to aviation within the City of Fort Myers. (Added by Ordinance No. 07-09).

RESPONSE: The requested text amendments are consistent with this Objective and supporting Policies. The formal airport master planning process is guided by state and federal requirements, which require significant attention be placed on aviation as well as non-aviation land use planning. This ensures long-term aviation demands are satisfied and local land use compatibility achieved for non-aviation related developments. The proposed non-aviation development in the non-aviation land areas depicted in the adopted Airport Layout Plan is consistent with the

adopted SWFIA Master Plan, which incorporates aviation as well as non-aviation land uses for future development.

Although a formal update to the SWFIA Master Plan will occur on average every 5 to 7 years, airport planning at the local and state level occurs continuously. This is accomplished through the review and amendment of the airport's annual capital improvement program, the Continuous Florida Aviation System Planning Process undertaken by the Florida Department of Transportation, and various other ongoing planning efforts undertaken by the LCPA.

The compatibility of future development is assured through the enforcement of the Lee Plan and Land Development Code, state and federal statutes, rules, and regulations, height limitations, and adherence to the development standards and regulations outlined in the approved SWFIA Master Plan. Coordination with the City of Fort Myers to manage the compatibility of future land uses and development of adjoining properties within the City is ongoing.

OBJECTIVE 47.3: FUTURE DEMANDS. Continually evaluate the projected demands for public aviation facilities and ensure their adequate provision.

POLICY 47.3.1: The Port Authority Executive Director will coordinate all expansion plans contained in approved airport master plans with the Federal Aviation Administration and the Florida Department of Transportation to ensure that projects of interest to the Port Authority are included in the federal and state funding programs. (Amended by Ordinance No. 99-15)

POLICY 47.3.2: The appropriate costs for expansion as depicted in the approved Port Authority CIP will continue to be coordinated with the Capital Improvements element. (Amended by Ordinance No. 99-15).

POLICY 47.3.3: Maximum use of airport facilities should be ensured before expanding or developing new facilities. (Amended by Ordinance No. 07-09)

POLICY 47.3.4: The proposed development schedule for the Southwest Florida International Airport through the year 2020 is depicted in Table 5(a) of the Lee Plan. The proposed development schedule for the Page Field General Aviation Airport through the year 2025 is depicted in Table 5(b) of the Lee Plan. These Tables include both aviation and non-aviation related development. If the FAA/FDOT mandate navigational improvements (NAVAIDS) or require improvements related to Airport security or safety at Southwest Florida International Airport or Page Field General Aviation Airport, then the Port Authority may pursue installation of the improvement even though the improvement is not specifically identified on Table 5(a) or Table 5(b). However, the Port Authority must obtain all appropriate approvals and permits prior to installation, including approval from Lee County. If these improvements precipitate a substantive change to Table 5(a), Table 5(b), Map 3F, or Map 3G, then the Port Authority must

pursue a Lee Plan amendment incorporating the changes in the next available amendment cycle. (Added by Ordinance No. 04-16, Amended by Ordinance No. 09-14).

RESPONSE: The request is consistent with this Objective and Policies with the exception of the proposed change to Policy 47.3.4 to indicate the non-aviation development is scheduled through 2030. The adopted SWFIA Master Plan identifies the aviation related development necessary to accommodate projected aviation demand as well as anticipated non-aviation development areas. This comprehensive plan amendment request addresses the identified market demand for non-aviation uses through the year 2030 as defined in the Market Analysis supporting this application. All future development approvals will be obtained through state permitting, rezoning, and local development order consistent with LDC requirements, including concurrency for non-aviation development.

OBJECTIVE 47.4: ACCESS. The Southwest Florida International Airport is an intermodal facility of significant value to the regional, state and federal transportation systems. Protecting this resource requires the provision of adequate landside and airside capacity. (Amended by Ordinance No. 99-15)

POLICY 47.4.1: The County and Port Authority will coordinate aviation facility expansion and demand, consistent with the Airport Layout Plan, through the County's annual Capital Improvement Program in conjunction with regular briefings by Port Authority staff to County staff. (Amended by Ordinance No. 98-09, 99-15, 04-16)

POLICY 47.4.2: The county and Port Authority recognize that the access from Interstate 75 to the Southwest Florida International Airport is designated as a priority intermodal connector in the National Highway Plan and Florida Intrastate Highway System Plan, and will work with the MPO, FDOT and the Federal Highway Administration to ensure that this access receives funding and is developed compatibly with the intermodal access needs of the region. (Amended by Ordinance No. 99-15)

POLICY 47.4.3: The Port Authority will coordinate surface transportation planning for Page Field and the Southwest Florida International Airport with the Lee County Metropolitan Planning Organization, the county Department of Transportation, Lee Tran, and the Florida Department of Transportation to ensure adequate access to the airports. (Amended by Ordinance No. 98-09, 99-15, 07-09)

POLICY 47.4.4: The County and Port Authority recognize the significance and value of the Southwest Florida International Airport. The Lee County Port Authority will aggressively pursue Federal and State funding for access roadway improvements as identified on the Airport Layout Plan. (Added by Ordinance No. 04-16)

POLICY 47.4.5: Development of non-aviation related uses on airport property will be required to meet concurrency standards set forth in the Lee County Land Development Code. (Added by Ordinance No. 04-16)

RESPONSE: This comprehensive plan amendment request addresses the identified market demand for non-aviation uses through the year 2030 as defined in the Market Analysis supporting this application. The associated transportation impacts have been analyzed in the Traffic Analysis accompanying this application. The Port Authority will continue coordinating with local, state and federal transportation agencies to pursue funding and improvements to ensure adequate access to airport lands. The development approvals for the anticipated non-aviation development through the year 2030 will be obtained through state permitting, rezoning, and local development order consistent with LDC requirements, including concurrency for non-aviation development.

OBJECTIVE 47.5: COORDINATED COMMERCE MOVEMENT. The Port Authority will provide facilities that are economically feasible and compatible with adjacent land uses, environmental standards and public safety, and that also meet the needs of commerce movement enterprises and facilities. (Amended by Ordinance No. 99-15)

POLICY 47.5.1: The Port Authority will continue to coordinate plans for existing and proposed aviation facilities with appropriate transportation agencies such as the Federal Aviation Administration, the Transportation Security Administration, the Lee County Metropolitan Planning Organization, the Florida Department of Transportation, Lee Tran and the Lee County Department of Transportation. (Amended by Ordinance No. 98-09, 99-15, 07-09)

POLICY 47.5.2: The county will monitor roads leading to Page Field and the Southwest Florida International Airport in order to facilitate efficient and convenient access for airport users. (Amended by Ordinance No. 99-15)

POLICY 47.5.3: The county will coordinate with private investors by reviewing plans and otherwise providing technical assistance in the development of aviation facilities in Lee County to ensure land use, airspace, and environmental compatibility. (Amended by Ordinance No. 99-15)

POLICY 47.5.4: The county will consider land use compatibility when reviewing development proposals within the vicinity of existing or proposed aviation facilities. (Amended by Ordinance No. 99-15)

POLICY 47.5.5: Locations adjacent to or near aviation facilities are identified in the Future Land Use Map as suitable for commerce movement support facilities such as warehouses, cargo handling facilities, and other transfer points, and will be periodically reviewed and updated. (Amended by Ordinance No. 98-09)

POLICY 47.5.6: The Port Authority will encourage cargo and freight development at the Southwest Florida International Airport by implementing domestic and international cargo marketing programs and by expanding airport facilities, as needed, in order to

accommodate large domestic and international cargo carriers. (Amended by Ordinance No. 99-15)

POLICY 47.5.7: The County will protect existing and proposed aviation facilities from the encroachment of incompatible land uses by updating the Future Land Use Map as needed to achieve consistency with revisions to the respective FAR Part 150 Studies (if applicable), and Airport Layout Plans for Southwest Florida International Airport and Page Field, as proposed by the Port Authority. (Amended by Ordinance No. 99-15, 04-16)

POLICY 47.5.8: The county will encourage the provision of warehouses, cargo handling facilities, and freight transfer points at aviation facilities needed for the movement of commerce by local industries, trade, and commercial enterprises. (Amended by Ordinance No. 99-15).

RESPONSE: This comprehensive plan amendment request is consistent with the above referenced Objective and Policies. The Port Authority seeks to allow for appropriate and compatible non-aviation land uses on airport property, including warehouses, through approval of this application.

OBJECTIVE 47.6: AGENCY COORDINATION. Ensure that existing and future air system needs can be met safely and with a minimum of land use conflict by coordinating aviation facility plans with appropriate federal, state, regional, and local review and permitting agencies. (Amended by Ordinance No. 99-15)

POLICY 47.6.1: The Port Authority will coordinate and obtain approval for airport development from the County through the annual capital improvement planning and programming process; local permitting process; Airport Master Plan Update process; and, the Lee Plan amendment process to ensure compatibility with other County programs. The Port Authority will provide Lee County copies of the annual Capital Improvement Plan or other similar document for the Southwest Florida International Airport and Page Field General Aviation Airport. Airport development will remain consistent with the MPO Long Range Transportation Plan and will support the provision of regional transportation facilities for the efficient use and operation of the transportation system and airports. Additional specific coordination requirements are contained in Objective 151.4 and subsequent policies. (Amended by Ordinance No. 99-15, 04-16, 09-14)

POLICY 47.6.2: While airport facilities will be operated in conformance with applicable state and federal regulations, the Port Authority will strive to ensure that Lee County environmental and other regulations are also implemented to the greatest extent possible. (Amended by Ordinance No. 99-15)

POLICY 47.6.3: The Port Authority will develop plans for aviation in the county that are consistent with the Continuing Florida Aviation System Planning Process and the National Plan of Integrated Airport Systems. (Amended by Ordinance No. 99-15)

POLICY 47.6.4: The safety of aircraft operators, aircraft passengers, and persons on the ground will guide the Port Authority in the operation of county airports, and hazardous wildlife attractants on or near the airports will be avoided. (Added by Ordinance No. 99-15)

POLICY 47.6.5: The county will maintain the tall structure permitting process to ensure that proponents of potential structural hazards to aviation coordinate with the Port Authority and the Federal Aviation Administration to properly place, mark and light potential obstructions as necessary. (Added by Ordinance No. 99-15)

POLICY 47.6.6: In the interest of the safety of air commerce, the county will not approve a temporary or permanent structure that exceeds the height limitation standards, or does not comply with placement, lighting and marking standards, established by the Port Authority, Florida Statutes, or the Federal Aviation Administration rules and regulations. (Added by Ordinance No. 99-15, Amended by Ordinance No. 07-09)

RESPONSE: This comprehensive plan amendment request is consistent with this Objective and Policies. The LCPA coordinates with the Florida Department of Transportation, Federal Aviation Administration, Metropolitan Planning Organization (MPO), Lee County and numerous other local, regional, state and federal agencies in the development and implementation of the SWFIA Master Plan. Lee County has adopted the Airport Hazard Special Purpose District (Division 10 of Article VI of Chapter 34 of the Land Development Code) for the purpose of promoting maximum safety of residents and property within areas surrounding county airports including SWFIA.

OBJECTIVE 47.7: COORDINATION OF ELEMENTS. Coordinate the expansion of existing airports and the proposed siting of any new airports with the Future Land Use and Conservation and Coastal Management elements. (Amended by Ordinance No. 99-15, 07-09)

POLICY 47.7.1: The use of existing and proposed aviation facilities will be promoted by the Port Authority consistent with the Future Land Use and Conservation and Coastal Management elements of the Lee Plan. (Amended by Ordinance No. 99-15)

POLICY 47.7.2: Ensure that adverse structural and non-structural impacts of aviation facilities upon natural resources and wildlife are mitigated consistent with FAA policies and procedures and in coordination with federal, state, regional and local environmental agencies. (Amended by Ordinance No. 99-15)

POLICY 47.7.3: The Port Authority will abide by all other relevant parts of this comprehensive plan in the construction and operation of Page Field Airport and the Southwest Florida International Airport, especially the Future Land Use, Conservation and Coastal Management, and Transportation elements. (Amended by Ordinance by No.

98-09, Amended and Relocated by Ordinance No. 99-15, Amended by Ordinance No. 07-09)

RESPONSE: This comprehensive plan amendment request is consistent with this Objective and Policies. The additional non-aviation development requested to occur on designated non-aviation lands is within the existing boundary of SWFIA. There is no expansion of airport property proposed through this comprehensive plan amendment

An environmental analysis which provides documentation of the environmental conditions and the FAA advisories about controlling wildlife attractants is included in this application package. The future development of the proposed non-aviation uses will be consistent with the Lee Plan, and all relevant local, state and federal statutes, rules, and regulations relating to environmental impacts and compatibility.

OBJECTIVE 117.2: XERISCAPE LANDSCAPE. The county will continue to promote xeriscape landscaping techniques. (Amended by Ordinance No. 94-30, 00-22)

RESPONSE: This comprehensive plan amendment request is consistent with this Objective. To address water conservation, the Port Authority is committed to utilizing drought-tolerant ground covers and shrubs that are on the Port Authority's "Compatible Native Landscape List for RSW and FMY." Additionally, for the land it manages, the Port Authority shall maximize use of irrigation systems alternative to spray (such as drip or seep) and utilization of rain sensors, and moisture sensing systems to determine existing soil moisture, evapotranspiration rates, and zone control. For leased non-aviation development sites, the Port Authority shall encourage these types of irrigation systems as well as commercial use of energy star appliances and appliances with low water consumption rates through its lease agreements.

GOAL 151: SERVICE COORDINATION. To provide for efficient and effective coordination of provision of public services by Lee County and its special districts, bodies, boards, and other entities.

OBJECTIVE 151.4: COORDINATION OF AIRPORT DEVELOPMENT AND IMPROVEMENTS AT THE SOUTHWEST FLORIDA INTERNATIONAL AIRPORT AND PAGE FIELD GENERAL AVIATION AIRPORT WITH ALL PERMITTING AGENCIES. The Port Authority will coordinate with Lee County, the Southwest Florida Regional Planning Council, the Florida Department of Community Affairs, Federal Aviation Administration, and the Florida Department of Transportation to ensure that the development of the Southwest Florida International Airport and the Page Field General Aviation Airport is consistent with the Lee Plan. (Added by Ordinance No. 04-16, Amended by Ordinance No. 09-14)

POLICY 151.4.1: Port Authority staff will ensure that Lee County staff is directly involved in the review and approval process related to the ongoing update of the Airport Master Plan for Southwest Florida International Airport and Page Field General Aviation Airport. This mandatory inter-agency coordination will provide an official means for scheduled review and comment regarding Airport Master Plan Updates, related Lee Plan amendments, annual updates of the Airport Layout Plan and Capital Improvement Program, permitting for scheduled capital improvement projects, amendments to the Airport zoning approvals and compliance with the Lee County Land Development Code. (Added by Ordinance No. 04-16, Amended by Ordinance No. 09-14)

POLICY 151.4.2: The Port Authority will submit and County staff will review and provide comments regarding the following:

1. Scope and content of ongoing updates to the Airport Master Plan for Southwest Florida International Airport and Page Field General Aviation Airport pursued in accordance with Federal Aviation Administration Advisory Circular 150/5070-6 and the Florida Department of Transportation Guidebook for Airport Master Planning.
 2. Consistency of proposed amendments to the Airport Master Plan and resulting Airport Layout Plan for Southwest Florida International Airport (Map 3F) and Page Field General Aviation Airport (Map 3G) with the Lee Plan, Land Development Code (LDC) and local zoning approvals.
 3. Compatibility and compliance of individual CIP projects with the Lee Plan, LDC regulations, zoning approvals and other applicable regulations.
 4. Proposed Lee Plan Amendments necessary to support revisions to the Airport Layout Plan for Southwest Florida International Airport (Map 3F) and Page Field General Aviation Airport (Map 3G), the Southwest Florida International Airport Proposed Development Schedule (Table 5(a)), the Page Field General Aviation Airport Proposed Development Schedule (Table 5(b)), the Airport Master Plans for Southwest Florida International Airport and Page Field General Aviation Airport, or CIP project list.
- (Added by Ordinance No. 04-16, Amended by Ordinance No. 09-14)

POLICY 151.4.3: Prior to submittal of any application to amend the Lee Plan, the Port Authority staff must obtain an endorsement of the proposed plan amendment application package, including the Airport Layout Plan, from the Board of Port Commissioners. Written evidence of this endorsement must be included in the plan amendment application package. The Port Authority staff will coordinate the date and time the endorsement request will be presented to the Port Commissioners with the County in order to provide County staff with ample opportunity to attend the meeting and address the Port Commissioners as necessary. (Added by Ordinance No. 04-16)

POLICY 151.4.4: Prior to formal submittal of any Lee Plan amendment package, rezoning request, or development order application, the Port Authority staff will informally present the proposed application to Lee County staff for initial comments and

input regarding consistency with the Lee Plan and County regulations. (Added by Ordinance No. 04-16)

POLICY 151.4.5: The Port Authority is the lead agency in coordinating efforts to obtain approval for Southwest Florida International Airport access improvements with agencies participating in the Lee County Metropolitan Planning Organization. This includes the incorporation of improvements into the Financially Feasible Transportation Plan (Map 3A) and the Lee County Metropolitan Planning Organization Financially Feasible Highway Plan and Needs Assessment. The Port Authority will work with local, state, and federal transportation agencies to identify and obtain funding for access improvements to the airport. (Added by Ordinance No. 04-16).

RESPONSE: This proposed comprehensive plan amendment is consistent with this Goal, Objective and Policies. The request is consistent with the SWFIA Master Plan and Airport Layout Plan that are developed according to FAA guidelines and that have been incorporated into the Lee Plan, thereby assuring consistency.

No aspects of this rezoning request necessitate amendments to the Airport Master Plan and Airport Layout Plan. Coordination of any future updates to the Page Field Airport Master Plan and Airport Layout Plan shall be accomplished in accordance with the policies of the Lee Plan.

Port Authority staff informally presented the proposed comprehensive plan amendment application to Lee County staff for initial comments on July 7, 2010. Prior to submittal of this comprehensive plan amendment application, the Port Authority has obtained an endorsement of the proposed plan amendment application package from the Board of Port Commissioners, and written evidence of the endorsement accompanies this application.

GOAL 152: GROWTH MANAGEMENT. To coordinate the plans and policies of Lee County, its municipalities, and adjacent local governments so as to guide, manage, and regulate urban growth in a compatible fashion.

RESPONSE: The request comprehensive plan amendment is consistent with this Goal. The subject property is designated Airport on the Future Land Use Map, and is considered an Urban area. The non-aviation development proposed through this comprehensive plan amendment will be incorporated within the existing boundary of SWFIA. Coordination with local jurisdictions shall continue through necessary development approval processes of rezoning and local development order.

3. Describe how the proposal affects adjoining local governments and their comprehensive plans.

Southwest Florida International Airport (SWFIA) is one of the top 50 U.S. airports for passenger traffic and continues to add flights and service to better serve the region. SWFIA is a major asset to surrounding local governments in the region, as it contributes to the economic base by providing mobility of goods and people.

The utilization of non-aviation designated land for businesses and industry is financially supportive to the Airport, and therefore contributes to the economic viability of the airport asset and the communities that it serves. Therefore, the addition of non-aviation development in non-aviation land areas at SWFIA as requested in this application is a benefit to surrounding local governments.

The City of Fort Myers city limits are within close proximity to the northern boundary of the Airport property. A small portion of the Airport property that is north of Daniels Parkway borders the Arborwood Master Planned Community that lies along Treeline Avenue within the City of Fort Myers. Pursuant to Lee Plan Policy, the City of Fort Myers and Lee County coordinate to ensure land use regulations on lands surrounding Airport property promote compatibility between uses. The proposed additional non-aviation development will provide jobs, shopping, and service opportunities to nearby City residents. The City and County will continue adhering to Intergovernmental Coordination goals, objectives and policies of their Comprehensive Plans.

4. List State Policy Plan and Regional Policy Plan goals and policies which are relevant to this application.

This application furthers the following State Policy Plan (SPP) goals and policies and Regional Policy Plan (RPP) strategy and action:

SPP Policy 7(b)5. Ensure that new development is compatible with existing local and regional water supplies.

SPP Goal 15(a) In recognition of the importance of preserving the natural resources and enhancing the quality of life of the state, development shall be directed to those areas which have in place, or have agreements to provide, the land and water resources, fiscal abilities, and service capacity to accommodate growth in an environmentally acceptable manner.

SPP Policy 15(b)1. Promote state programs, investments, and development and redevelopment activities which encourage efficient development and occur in areas which will have the capacity to service new population and commerce.

SPP Policy 15(b)3. Enhance the livability and character of urban areas through the encouragement of an attractive and functional mix of living, working, shopping, and recreational activities.

SPP Policy 15(b)6. Consider, in land use planning and regulation, the impact of land use on water quality and quantity; the availability of land, water, and other natural resources to meet demands; and the potential for flooding.

SPP Goal 17(a) Florida shall protect the substantial investments in public facilities that already exist and shall plan for and finance new facilities to serve residents in a timely, orderly, and efficient manner.

SPP Policy 17(b)1. Provide incentives for developing land in a way that maximizes the uses of existing public facilities.

SPP Policy 17(b)5. Encourage local government financial self-sufficiency in providing public facilities.

SPP Policy 17(b)6. Identify and implement innovative but fiscally sound and cost-effective techniques for financing public facilities.

SPP Policy 19(b)5. Ensure that existing port facilities and airports are being used to the maximum extent possible before encouraging the expansion or development of new port facilities and airports to support economic growth.

SPP Policy 21(b)1. Attract new job-producing industries, corporate headquarters, distribution and service centers, regional offices, and research and development facilities to provide quality employment for the residents of Florida.

SPP Policy 21(b)13. Promote coordination among Florida's ports to increase their utilization.

SPP Policy 24(b)4. Encourage economic development in economically distressed areas.

SPP Policy 24(b)5. Ensure that the transportation system provides maximum access to jobs and markets.

RPP Economic Development Strategy: Ensure the adequacy of lands for commercial and industrial centers, with suitable services provided.

RPP Transportation Action: Assist the region's airports in planning new improvements that will minimize travel delays and improve ground access for passengers, goods, and commercial vehicles.

Exhibit IV.F
Additional Requirements for Specific Future Land Use Amendments
For
RSW Comprehensive Plan Amendment

1. Requests involving Industrial and/or categories targeted by the Lee Plan as employment centers (to or from)

Response: N/A - The request does not involve land designated as Industrial or as employment center.

2. Requests moving lands from a Non-Urban Area to a Future Urban Area.

Response: N/A - The subject property is within the Airport Future Land Use category, which is a Future Urban Area per the Lee Plan.

3. Requests involving lands in critical areas for future water supply must be evaluated based on policy 2.4.2.

Response: N/A – The subject property is not in lands critical for future water supply.

4. Requests moving lands from Density Reduction/Groundwater Resource must fully address Policy 2.4.3 of the Lee Plan Future Land Use Element.

Response: N/A – The subject property is not subject to the Density Reduction/Groundwater Resource designation.

Exhibit IV.G.
Sound Planning Principles
For
RSW Comprehensive Plan Amendment

Florida's growth management law is designed to ensure sound planning for the proper placement of growth and protection of the state's land, water, and other natural resources since such resources are essential to our collective quality of life and a strong economy.

There are special considerations involved in the sound planning of airports within a community. Land use planning for airports must take into account all acreage within the airport boundary. Land uses within the airport boundary can be classified as aviation related and non-aviation related. "When there is acreage within the airport boundary in excess of aviation needs, it is sound fiscal planning to provide the greatest financial return from leases of the excess property" (Horonjeff and McKelvey, *Planning and Design of Airports*, 1994). Documented evidence of the importance of airport activity and development to the health and viability of the region's economy is provided in the 2010 Florida Statewide Aviation Economic Impact Study conducted by Florida Department of Transportation. This study determined the total contribution from RSW's operations to the region's economy through direct and indirect sources is \$3.8 billion annually.

The excess property at SWFIA that is not designated for aviation or future aviation expansion is designated for water management, open space, and non-aviation uses. The non-aviation use lands have been located to ensure they do not interfere with aircraft operations, communication equipment, and aids to navigation on the ground. The designation of non-aviation land uses also takes into account the impacts and compatibility of proposed uses on surrounding properties. The location of the northern non-aviation use lands are oriented toward Daniels Parkway, which is part of a corridor consisting of a mix of industrial, commercial and publicly owned land. The Port Authority seeks to lease the non-aviation use areas for appropriate non-aviation uses consistent with sound fiscal planning, to provide revenue to assist with the fiscal viability of the Airport.

The Port Authority engaged Johnson Engineering, Inc. ecologists and Archeological Consultants, Inc. to inventory and analyze the characteristics of the northern non-aviation lands to determine suitability for development. The results of the analysis show that the northern non-aviation lands are not known to be of archeological or historical significance. The environmental assessment provided with this application indicates the northern non-aviation lands are suitable to be developed. Specifically, the suitability of these lands for development is determined considering Federal Aviation Administration (FAA) Advisory Circular 150/5200-33B, which identifies that certain land uses, such as large tracts of open undeveloped land, natural areas, wastewater treatment plants, agricultural crops, and solid waste landfills have the potential to attract hazardous wildlife and can present potential hazards to aviation if they encourage wildlife to enter an airport's approach and departure space or air operations area. Therefore, the proposed uses are identified and shall be developed to minimize wildlife attraction and support aircraft and air traveler safety in accordance with the rules and regulations of the FAA, SFWMD, and Lee County.

The Port Authority engaged Real Estate Research Consultants, Inc. to perform market and needs analysis to assess property in the vicinity of the Airport and substantiate the demand for non-

Exhibit IV.G.
Sound Planning Principles
For
RSW Comprehensive Plan Amendment

aviation uses in the Airport's market area, provided as an attachment to this application. The horizon year for the analysis is consistent with the 2030 planning horizon of the Lee Plan. The market and needs analysis quantifies development potential that is supportable through 2030 according to population and employment data and trends. This market and needs analysis was based on professionally accepted methodology and provides justification for the request to ensure the proposed development is properly placed in the market.

The acreage proposed to accommodate the development substantiated through the market and needs analysis was derived using appropriate Floor Area Ratio (FAR). While an industry standard Floor Area Ratio was not found in reference material, the appropriate FAR was determined using other community examples and the calculated FAR of the previously approved development in the northern non-aviation land area. The FAR for non-aviation development listed in Development Schedule Table 5(a) (excluding hotel, kennel, and convenience store assigned to the Midfield area) currently approved through 2020 on 100 acres is an FAR of approximately 0.10. Other communities were found to have minimum standard or observed industrial and commercial FARs of 0.10, including the following examples:

- Fairfax County, Virginia *Coding Scheme for Planned Uses*: base FAR of 0.1 for Office uses, Retail uses, Light Industrial/R&D uses.
- City of Fontana, California *General Plan*: base FAR of 0.1 for Community Commercial, General Commercial, Regional Mixed Use/Non-Residential, Light Industrial, and General Industrial uses.
- Contra Costa County, California *General Plan*: base FAR of 0.1 for Airport Commercial.
- Monroe County, Pennsylvania *Comprehensive Plan*: average FAR of 0.1 assumed for Manufacturing and Distribution, base FAR of 0.1 assumed for Retail, Service, Finance, Insurance and Real Estate uses.

The additional development substantiated by the market and needs analysis through 2030 is proposed to be accommodated on 200 acres, which calculates to an FAR 0.12, comparable to the calculated FAR for the non-aviation currently approved and the FAR examples from other communities. This FAR allows for industrial and commercial site design that includes the appropriate water management, open space, indigenous preserve, and minimization of wetland impacts to the extent acceptable by the FAA, without contributing to wildlife and bird attraction and the associated aviation safety hazards.

This request to amend the Development Schedule Table 5(a) and the acreage limit in Policy 1.2.7 to allow for additional non-aviation development to occur provides for proper placement of non-aviation development on non-aviation lands designated on a duly adopted Airport Layout Plan that is in accordance with an adopted Airport Master Plan, which is also incorporated in the County's Comprehensive Plan as provided for in Florida Statutes Section 163.3177(6)(k).

Through the process of data collection and analysis for land use compatibility, market factors, and environmental conditions, the requested amendment has been based on sound planning principles to provide for the proper placement of growth, protection of natural resources, and furtherance of a strong economy.

MEMORANDUM

TO: Mark Fisher, Deputy Executive Director, Development
Emily Underhill, Director of Development Services
Lee County Port Authority
Southwest Florida International Airport and Page Field

FROM: Matt Taylor, AICP, Chief Executive Officer
Barbie Schalmo, Associate
Real Estate Research Consultants, Inc.

DATE: August 20, 2010

RE: **Market analysis and needs assessment for RSW Comprehensive Plan Amendment, non-aviation future development north of Runway 6-24 (RERC 10-084)**

For transmission by email to:

mrfisher@flylcpa.com

emunderhill@flylcpa.com

Hard copy will not follow unless requested

The following analysis and documentation reflect research conducted in January and February 2010. This research included fieldwork conducted in the Fort Myers metro area, stakeholder and market participant interviews, and analysis of market conditions and various data sources available as of early first quarter 2010.

The following presents a summary discussion of the overall Cape Coral-Fort Myers Metropolitan Statistical Area (MSA) marketplace, relevant real estate sector submarkets, and the supportable non-aviation uses for privately sponsored and/or joint public-private development on those non-aviation properties (subject site/property) located north of Runway 6-24 at Southwest Florida International Airport (RSW). This summary addresses supportable market-driven uses that reflect consideration of the competitive environment, currently approved development in the vicinity of the subject site, and supportable ranges of demand. Program assumptions outlined here consider studies and analyses previously completed for the property and other nearby sites, information and data provided by Lee County Port Authority (LCPA) staff and other public agencies, interviews conducted with market participants and key stakeholders in the study area during January through March 2010, research into current market data and trends including analysis of third party private vendor data, evaluation of development case studies, extensive fieldwork in the local market, and our staff's industry knowledge and experience.

Given the current market context and location, RERC's research efforts for the subject property focused on office, industrial, retail/restaurant/services, and hotel demand for the planning year 2030. The subject property is located along the northern boundary of RSW, primarily bordering the south side of Daniels Parkway, and immediately south of the planned Boston Red Sox training complex and associated development.

EXECUTIVE SUMMARY: BOTTOM-LINE OF THE ANALYSIS

As of the second quarter of 2010, the Cape Coral-Fort Myers MSA residential and commercial markets remain weak in terms of supportable demand and values. While the short term will likely be a period of correction of overbuilt conditions in the local market, mid- and long-term growth in population and employment will ultimately stabilize the market and provide opportunities for new real estate development. The outlook for growth in this market over the next two decades is favorable given state population and employment projections for Lee County. Several factors will contribute to or constrain the market attractiveness of the subject property for future intensified development. Specifically, the development potential for the subject property will be dependent on competitive concentrations already existing and planned in the marketplace, stimulus created by on-going airport activity, density or other design limitations imposed by regulatory agencies, and the future capacity of the transportation network in the vicinity of the subject property.

Based on RERC's market analysis, there appears to be sufficient demand going forward in the area to develop the property with office, industrial, retail and services, and hotel uses. From our market research, we have identified the following supportable development program.

RERC-IDENTIFIED CUMULATIVE COMMERCIAL DEVELOPMENT POTENTIAL, 2010 - 2030		
Estimated Potential Incremental Demand & Corresponding Need by Land Use for Subject Site		
Product Type	Total Additional Market Demand	Total Additional Market Need*
Office Space (SF)	350,000	437,500
Industrial Space (SF)	510,000	637,500
Retail/Restaurant/Services Space (Avg. SF)	203,000	253,750
Total Potential SF	1,063,000	1,328,750
Hotel (Rooms)	150	187

* reflects application of 25% market factor

Source: Real Estate Research Consultants, Inc.

PREVAILING MSA MARKET CONDITIONS

According to the Bureau of Economic and Business Research at the University of Florida, the 2009 estimated population for the Cape Coral-Fort Myers MSA was approximately 615,000 people. Prior to the most recent national real estate cycle, the MSA had historically experienced steady, modest growth in population and employment which supported smaller scale, incremental additions to building inventory. During the current economic cycle, the local market has reflected the larger national market declines but with generally more severity and greater volatility in market metrics. Despite expectations for slowing job losses, significant cumulative job losses in the metro area have affected space demand for all major real estate sectors. The following summarizes general trends in the MSA as well as the state of the office, industrial, retail, and hotel sectors in the metro area at the end of 2009/beginning of 2010.

Population

The Cape Coral-Fort Myers MSA is a single county metropolitan statistical area comprised of Lee County. The city of Cape Coral, with a population of 162,852, ranks ninth in 2009 population in the state of Florida between the cities of Tallahassee, ranked eighth, and Port St.

Lucie, ranked tenth. The city of Fort Myers has a 2009 population estimate of 68,819 which ranks 32nd in the state. When comparing county growth rates, Lee County ranks fourth in population growth between 2000 and 2009, just ahead of fifth ranked Palm Beach County.

The Cape Coral-Fort Myers MSA has historically experienced robust growth in population. A comparison of growth among MSAs in the state shows that between 2000 and 2009 the metro area experienced a 39.5% growth rate; only the Palm Coast MSA (Flagler County) experienced a higher rate of growth at 90.4% within the nine-year period.

The following table presents the population and average annual growth rates historically and projected for the MSA. By 2030, the population of the MSA is projected to reach 957,100 or 3.8% of the State's population. The population is estimated to grow to over one million residents by 2035.

TOTAL POPULATION, 1980 - 2035										
Cape Coral-Fort Myers MSA										
	Census			Estimate	Projections*					
	1980	1990	2000	2009	2010	2015	2020	2025	2030	2035
MSA Population	205,266	335,113	440,188	615,124	622,900	701,000	789,600	875,700	957,100	1,034,400
Avg Annual Growth Rate		5.0%	2.8%	3.8%	1.3%	2.4%	2.4%	2.1%	1.8%	1.6%

* Medium projections: Projections of Florida Population by County, 2008 - 2035 March 2009. University of Florida Bureau of Economic and Business Research (BEBR)
Source: University of Florida Bureau of Economic and Business Research; Real Estate Research Consultants, Inc.

Residential Building Permits

Since 1980, the influx of new residents into the Cape Coral-Fort Myers MSA had created an extraordinary demand for housing; as a result, the number of residential building permits issued annually was phenomenal until recently. The total number of annual permits issued between 1980 and 1989 averaged 7,300, 1990 through 1999 averaged 5,641, and between 2000 and 2009 averaged 12,382 annually. During the most recent decade there were nearly twice the number of permits issued compared to the combined total for the decades of the 1980s and 1990s. The three years from 2004 to 2006 alone exceeded the total number of permits issued during the entire decade of the 1990s. The following table shows the number of residential permits issued annually during the thirty-year period of 1980 through 2009.

TOTAL RESIDENTIAL BUILDING PERMITS ISSUED, 1980 - 2009										
Cape Coral-Fort Myers MSA										
	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989
Single family	2,875	2,792	2,005	3,414	3,507	3,594	3,431	4,563	4,736	4,446
Multifamily	4,528	4,448	2,395	4,299	4,988	6,717	2,203	2,526	2,044	3,204
Total Units	7,403	7,240	4,400	7,713	8,495	10,311	5,634	7,089	6,780	7,650
	1990	1991	1992	1993	1994	1995	1996	1997	1998	1999
Single family	3,383	2,728	3,022	3,672	3,736	3,028	3,677	3,534	3,995	4,722
Multifamily	1,532	645	987	1,656	1,580	1,974	2,033	2,359	4,050	4,094
Total Units	4,915	3,373	4,009	5,328	5,316	5,002	5,710	5,893	8,045	8,816
	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009*
Single family	5,152	6,534	7,149	9,668	14,958	22,211	14,700	4,356	1,216	906
Multifamily	3,968	4,425	3,997	6,007	5,437	7,119	4,046	1,549	386	38
Total Units	9,120	10,959	11,146	15,675	20,395	29,330	18,746	5,905	1,602	944

* Preliminary year-to-date 2009
Source: HUD SOCDs Building Permits Database; Real Estate Research Consultants, Inc.

Undoubtedly, the number of permits issued during the last decade has led to an over-supply of housing in the market. The Cape Coral-Fort Myers MSA ranked ninth of all MSAs nationwide in the number of residential foreclosures according to RealtyTrac. The high number of foreclosures has resulted in an unprecedented number of empty housing units. In rankings by state, Florida ranked third nationally in foreclosures at year-end 2009.

Employment and Labor Force

During the current contraction of the economic cycle, the local job market has not only reflected the larger national market declines but with generally more severity and greater volatility. Despite expectations for slowing job losses in the coming months, significant cumulative job losses in the metro area occurred through 2009 affecting space demand for all major commercial real estate sectors.

At the time of this analysis, the February 2010 unemployment rate for the MSA had reached 13.9%; the 2009 annual average for unemployment was 13.0%. The statewide unemployment rate in February was 12.2%, and the 2009 annual average was 10.5%. Employment and unemployment figures have fluctuated dramatically over the past twelve months. The 2009 annual average for the nation was 9.3%, though the February 2010 rate was 10.4%. The following table shows MSA labor force and employment annual averages for years 2000 through 2009.

TOTAL NONAGRICULTURAL EMPLOYMENT			
Cape Coral-Fort Myers MSA			
Year	Labor Force	Employment	Unemployment Rate
2000	207,750	201,047	3.2%
2001	218,632	210,494	3.7%
2002	227,209	216,662	4.6%
2003	237,591	226,688	4.6%
2004	250,107	240,168	4.0%
2005	268,561	259,995	3.2%
2006	283,321	275,045	2.9%
2007	289,153	275,783	4.6%
2008	285,839	262,577	8.1%
2009	275,911	240,133	13.0%

Source: Florida Agency for Workforce Innovation; Real Estate Research Consultants, Inc.

The following table summarizes employment-related trends over a recent nine-year period where employment growth averaged 2.0% annually. Employment projections for the MSA released by the Florida Agency for Workforce Innovation indicate an estimated average annual increase of 2.4% for the 2009 to 2017 timeframe.

LABOR FORCE AND EMPLOYMENT RATES		
Cape Coral-Fort Myers MSA		
Year	Average Annual Growth Rates	
	Labor Force	Employment
2000 - 2001	5.2%	4.7%
2001 - 2002	3.9%	2.9%
2002 - 2003	4.6%	4.6%
2003 - 2004	5.3%	5.9%
2004 - 2005	7.4%	8.3%
2005 - 2006	5.5%	5.8%
2006 - 2007	2.1%	0.3%
2007 - 2008	- 1.1%	- 4.8%
2008 - 2009	- 3.5%	- 8.5%
Avg. Annual	3.2%	2.0%

Source: Florida Agency for Workforce Innovation; Real Estate Research Consultants, Inc.

The following real estate sector trend information comes from the Lee County Property Appraiser, local commercial brokers and third party sources current as of February 2010.

Office

The total office inventory in the MSA is approximately 21 million square feet, and the market has historically (2000-2008) experienced average annual additions to inventory of approximately 770,000 square feet; presumably some of this added office space is occupied by companies new to the area as well as existing office user expansions or upgrades. Roughly 85% of the office space in the market is multi-tenanted, and 15% of the inventory is in single tenant buildings. During the 4th quarter of 2009, the MSA office market experienced small positive absorption of space resulting in an overall vacancy rate of nearly 17%, a vacancy rate that remains unfavorable relative to the average vacancy rate in the national market. Under more normal economic conditions, the market would begin to see serious movement to increase supply with a vacancy rate in the 10% range. Asking rental rates decreased during the quarter to approximately \$17 per square foot for available office space in all classes – these remain below prevailing national office rental rates. Approximately 150,000 square feet of multi-tenant office space was under construction at the end of the quarter with a substantial percentage of speculative space to be delivered in the near term.

Industrial

The total industrial inventory in the MSA is approximately 36 million square feet, and the market has historically (2000-2008) experienced average annual additions to inventory of approximately 1.4 million square feet; approximately 75% of the industrial space in the market is multi-tenant. During the 4th quarter of 2009, the MSA industrial market experienced small, negative absorption of space resulting in a slightly higher vacancy rate of nearly 17%. Of note, the ratio of warehouse to flex space in the market is approximately 85/15, and flex space absorption was stronger than warehouse absorption. Asking rental rates decreased in the quarter to just less than \$6 per square foot. Industrial space under construction totaled 5,000 square feet at the end of the quarter.

Retail

The total retail inventory in the MSA is approximately 40.5 million square feet, and the market has historically (2000-2008) experienced average annual additions to inventory of approximately 1.6 million square feet. During the last quarter of 2009, the MSA retail market experienced negative absorption of space resulting in an increased vacancy rate of approximately 10%. Asking rental rates for all types of retail space decreased during the quarter to under \$15 per square foot reflecting the general decline in retail sales activity, downsizing, and renegotiated leases. Approximately 215,000 square feet of primarily multi-tenant retail space was under construction at the end of the quarter.

Hotel

According to the *Florida Statistical Abstract 2009* published by the University of Florida Bureau of Economic and Business Research, there are 180 hotel/motel establishments with 10,698 units within the Cape Coral-Ft. Myers MSA. As shown in the table below, the number of establishments has not changed significantly over the past 24 years, but the number of units has increased by nearly 4,000 units.

TOTAL HOTEL AND MOTEL INVENTORY		
Cape Coral-Fort Myers MSA		
Year	Establishments	Units
1985	179	6,737
1990	170	8,173
1995	161	7,552
2000	172	8,922
2001	179	9,820
2002	179	9,820
2003	N/A	N/A
2004	177	9,814
2005	172	9,711
2006	165	9,628
2007	175	10,076
2008	174	10,051
2009	180	10,698

Source: *Florida Statistical Abstracts*; University of
Florida Bureau of Economic and Business Research;
Real Estate Research Consultants, Inc.

It is interesting to note the significant increase in the number of establishments and units between 2008 and 2009. The current recessionary period has impacted all aspects of the economy, including tourism, and will undoubtedly hamper hotel and motel construction during the near term. During this time period, competition from timeshares, vacation ownership resorts and privately owned condominiums has also increased.

The following tables present historical building inventory additions to the MSA in the various real estate sectors both on a decade-by-decade basis and an annual basis for 2000 through 2008. Of note, the 2000 to 2008 and the 1980 to 1989 periods experienced the greatest percentage additions to total inventory across the various real estate sectors. The 1990s also experienced significant additions in commercial inventory.

INVENTORY BY DECADE BUILT							
Cape Coral - Fort Myers MSA							
Residential (units)		Prior to 1970	1970-79	1980-89	1990-99	2000-08	TOTAL
Single Family	Total Units	24,201	23,651	35,644	35,836	80,094	199,426
	% Built	12.1%	11.9%	17.9%	18.0%	40.2%	100.0%
Multi-family	Total Units	3,484	6,711	9,527	3,748	12,255	35,725
	% Built	9.8%	18.8%	26.7%	10.5%	34.3%	100.0%
Condo	Total Units	1,353	12,684	21,325	14,251	30,118	79,731
	% Built	1.7%	15.9%	26.7%	17.9%	37.8%	100.0%
Other Residential	Total Units	2,379	7,460	8,619	4,813	2,817	26,088
	% Built	9.1%	28.6%	33.0%	18.4%	10.8%	100.0%
Total Residential Units		31,417	50,507	75,116	58,649	125,285	340,974
% Built		9.2%	14.8%	22.0%	17.2%	36.7%	100.0%
Commercial (SF)		Prior to 1970	1970-79	1980-89	1990-99	2000-08	TOTAL
General Retail	Total SF	2,021,368	1,592,756	1,215,664	3,731,927	5,098,370	13,660,085
	% Built	14.8%	11.7%	8.9%	27.3%	37.3%	100.0%
Supermarket	Total SF	145,305	217,493	612,302	869,898	531,858	2,376,856
	% Built	6.1%	9.2%	25.8%	36.6%	22.4%	100.0%
Regional Shopping Cntr	Total SF	904,890	151,685	189,793	1,513,454	2,254,074	5,013,896
	% Built	18.0%	3.0%	3.8%	30.2%	45.0%	100.0%
Community Shopping Cntr	Total SF	1,231,463	3,282,330	4,468,672	2,588,274	5,609,428	17,180,167
	% Built	7.2%	19.1%	26.0%	15.1%	32.7%	100.0%
Retail Subtotal		4,303,026	5,244,264	6,486,431	8,703,553	13,493,730	38,231,004
% Built		11.3%	13.7%	17.0%	22.8%	35.3%	100.0%
Office	Total SF	2,142,147	2,298,799	4,917,577	4,268,196	6,931,427	20,558,146
	% Built	10.4%	11.2%	23.9%	20.8%	33.7%	100.0%
Restaurant	Total SF	441,045	350,803	539,355	393,719	540,982	2,265,904
	% Built	19.5%	15.5%	23.8%	17.4%	23.9%	100.0%
Entertainment	Total SF	403,616	483,563	993,230	904,212	971,366	3,755,987
	% Built	10.7%	12.9%	26.4%	24.1%	25.9%	100.0%
Other Commercial	Total SF	1,136,794	1,538,800	1,441,750	1,059,978	1,643,819	6,821,141
	% Built	16.7%	22.6%	21.1%	15.5%	24.1%	100.0%
Total Commercial SF		8,426,628	9,916,229	14,378,343	15,329,658	23,581,324	71,632,182
% Built		11.8%	13.8%	20.1%	21.4%	32.9%	100.0%
Industrial (SF)		Prior to 1970	1970-79	1980-89	1990-99	2000-08	TOTAL
General Industrial	Total SF	2,986,566	5,488,389	8,264,383	6,252,008	12,526,226	35,517,572
	% Built	8.4%	15.5%	23.3%	17.6%	35.3%	100.0%

Source: Lee County Property Appraiser Final NAL 2009 Tax Roll, Real Estate Research Consultants, Inc.

INVENTORY BY YEAR BUILT, 2000-2008											
Cape Coral - Fort Myers MSA											
Residential (units)		2000	2001	2002	2003	2004	2005	2006	2007	2008	TOTAL
Single Family	Total Units	4,912	5,629	6,657	8,127	10,605	13,763	18,287	10,027	2,087	80,094
	% Built	6.1%	7.0%	8.3%	10.1%	13.2%	17.2%	22.8%	12.5%	2.6%	100.0%
Multi-family	Total Units	1,231	1,432	1,264	1,171	2,611	1,221	1,777	1,110	438	12,255
	% Built	10.0%	11.7%	10.3%	9.6%	21.3%	10.0%	14.5%	9.1%	3.6%	100.0%
Condo	Total Units	2,495	2,917	2,438	3,346	5,367	2,270	5,739	4,491	1,055	30,118
	% Built	8.3%	9.7%	8.1%	11.1%	17.8%	7.5%	19.1%	14.9%	3.5%	100.0%
Other Residential	Total Units	232	505	149	331	164	364	678	260	134	2,817
	% Built	8.2%	17.9%	5.3%	11.8%	5.8%	12.9%	24.1%	9.2%	4.8%	100.0%
Total Residential Units		8,870	10,483	10,508	12,975	18,748	17,618	26,482	15,888	3,714	125,288
% Built		7.1%	8.4%	8.4%	10.4%	15.0%	14.1%	21.1%	12.7%	3.0%	100.0%
Commercial (SF)		2000	2001	2002	2003	2004	2005	2006	2007	2008	TOTAL
General Retail	Total SF	158,496	200,254	606,732	481,030	462,503	676,132	1,046,651	572,867	893,705	5,098,370
	% Built	3.1%	3.9%	11.9%	9.4%	9.1%	13.3%	20.5%	11.2%	17.5%	100.0%
Supermarket	Total SF	86,525	19,651	171,555	53,792	45,657	80,521	18,402	55,755	-	531,858
	% Built	16.3%	3.7%	32.3%	10.1%	8.6%	15.1%	3.5%	10.5%	-	100.0%
Regional Shopping Cntr	Total SF	-	-	-	-	151,366	1,114,128	943,563	-	45,017	2,254,074
	% Built	-	-	-	-	6.7%	49.4%	41.9%	-	2.0%	100.0%
Community Shopping Cnt	Total SF	60,520	352,382	512,095	429,687	493,760	560,240	551,875	1,329,003	1,319,866	5,609,428
	% Built	1.1%	6.3%	9.1%	7.7%	8.8%	10.0%	9.8%	23.7%	23.5%	100.0%
Retail Subtotal		305,541	572,287	1,290,382	964,509	1,153,286	2,431,021	2,560,491	1,957,625	2,258,588	13,493,730
% Built		2.3%	4.2%	9.6%	7.1%	8.5%	18.0%	19.0%	14.5%	16.7%	100.0%
Office	Total SF	380,728	548,103	1,109,629	565,269	535,971	714,931	1,097,247	946,065	1,033,484	6,931,427
	% Built	5.5%	7.9%	16.0%	8.2%	7.7%	10.3%	15.8%	13.6%	14.9%	100.0%
Restaurant	Total SF	110,056	36,021	39,119	72,478	41,824	54,374	64,021	75,012	48,077	540,982
	% Built	20.3%	6.7%	7.2%	13.4%	7.7%	10.1%	11.8%	13.9%	8.9%	100.0%
Entertainment	Total SF	6,590	235,038	288,751	20,918	66,610	-	95,259	112,548	145,652	971,366
	% Built	0.7%	24.2%	29.7%	2.2%	6.9%	-	9.8%	11.6%	15.0%	100.0%
Other Commercial	Total SF	137,607	353,482	149,579	208,531	222,694	140,955	150,916	195,667	84,388	1,643,819
	% Built	8.4%	21.5%	9.1%	12.7%	13.5%	8.6%	9.2%	11.9%	5.1%	100.0%
Total Commercial SF		940,522	1,744,931	2,877,460	1,831,705	2,020,385	3,341,281	3,967,934	3,286,917	3,570,189	23,581,324
% Built		4.0%	7.4%	12.2%	7.8%	8.6%	14.2%	16.8%	13.9%	15.1%	100.0%
Industrial (SF)		2000	2001	2002	2003	2004	2005	2006	2007	2008	TOTAL
General Industrial	Total SF	1,122,684	1,830,271	1,482,286	989,118	1,112,158	1,570,734	1,290,549	1,454,350	1,674,076	12,526,226
	% Built	9.0%	14.6%	11.8%	7.9%	8.9%	12.5%	10.3%	11.6%	13.4%	100.0%
Note: Includes buildings constructed as of January 2009.											

Note: Includes buildings constructed as of January 2009.

Source: Lee County Property Appraiser Final NAL 2009 Tax Roll, Real Estate Research Consultants, Inc.

Implications

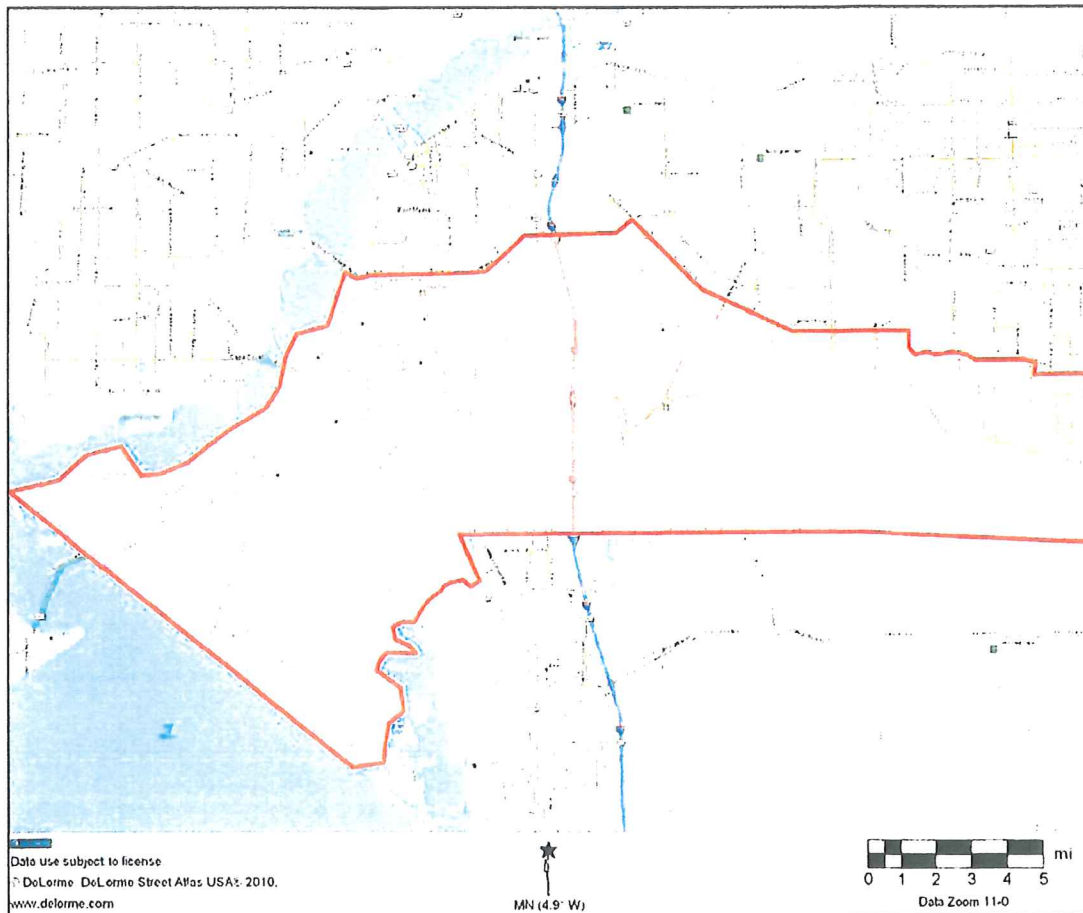
The size and historical delivery of the inventory as well as its spatial distribution offer insight into the metro area's basic market opportunities. Overall, the rate of new development from 2000 through 2008 in the MSA was robust. Office, industrial and retail space additions combined have averaged approximately 3.7 million square feet per year, including the period of rapid real estate growth that did much to accelerate the recession at a national level. Retail uses represent about 40% of the total annual additions.

All of these land uses now have vacancy rates that discourage substantial construction in the short term. Obviously, some areas of the MSA are better positioned than others on a relative basis as opportunities present themselves. As a result, the minimal amount of development activity that will occur over the next few years is most likely to stay in proximity to existing concentrations or to locate in demonstrably supportive environments.

Submarket conditions

Submarkets of the MSA market are specific geographic boundaries that serve to delineate a core group of buildings that are competitive with each other and constitute a generally accepted primary competitive set. Submarkets are building type/sector specific (e.g. office, retail, etc.) with distinct boundaries dependent on different factors relevant to each building type. Submarkets are non-overlapping, contiguous geographic designations having a cumulative sum that matches the boundaries of the overall market within which they are located. The focus here is on the commercial submarkets for office, industrial and retail uses. Data sources point to the relevant office, industrial and retail submarkets for our work to be generally defined by the Caloosahatchee River and Gulf of Mexico to the west, Colonial Boulevard and Immokalee Road to the north and east (with a portion of Lehigh Acres included), and Alico Road to the south. For each of the real estate sectors (office, industrial and retail), specific trade areas have been defined and analyzed relative to the submarket's performance. A trade area is defined as a geographic area from which one can expect the primary demand for a specific product or service provided at a fixed location. Sector-specific trade area definitions and analyses are presented in later sections of this document. The following map presents the general extents of the submarket as defined, which has been identified as the South Fort Myers Submarket.

South Fort Myers Submarket



Source: Delorme 2010, Third Party Commercial Broker Quarterly Reports, Real Estate Research Consultants, Inc.

Implications

The submarket's dynamics are affected by the general performance of its market characteristics in the context of many competing regional locations. For general planning purposes, we can ascertain that about 45% of the MSA office space, 40% of the MSA industrial space, and about 30% of the MSA retail space define the dimensions of any broad opportunities likely to exist within the submarket, that is, their reasonable fair share, all other things being equal. Because retail and residential development often occur in tandem, housing activity might capture a similar share of the larger market. In reality, the *adjusted* fair share likely varies based on concentrations of activity along key road segments, general location criteria, linkages to other supportive investments, site availability, appropriate land use designations, and other criteria which together act to disperse or attract certain kinds of development. These and similar matters are discussed further below.

SOUTHWEST FLORIDA INTERNATIONAL AIRPORT (RSW) AND SUBJECT PROPERTY

Passenger traffic at Southwest Florida International Airport (RSW) has increased steadily since 1983 when the airport moved its main operations from Page Field to its current location. Given the increased capacity in this new facility, passenger traffic increased 141% the first year alone. Since that time, the airport has seen the number of passengers increase to more than 7.4 million. Despite a recent decline in passenger volume during the current recessionary period, the average annual growth rate from 1983 to 2009 exceeded 10%. Southwest Florida International is one of the top 50 U.S. airports for passenger traffic and continues to add flights and service to better serve the region.

The following table presents historical annual passenger counts recorded at RSW's current location and the resulting impact of several recessions, including the current downturn, on passenger traffic. The table clearly reflects the rebound in passenger activity following several historical recessions in the recent past. Considering this trend, it is anticipated passenger traffic at RSW will experience a resurgence and continue to expand in the future.

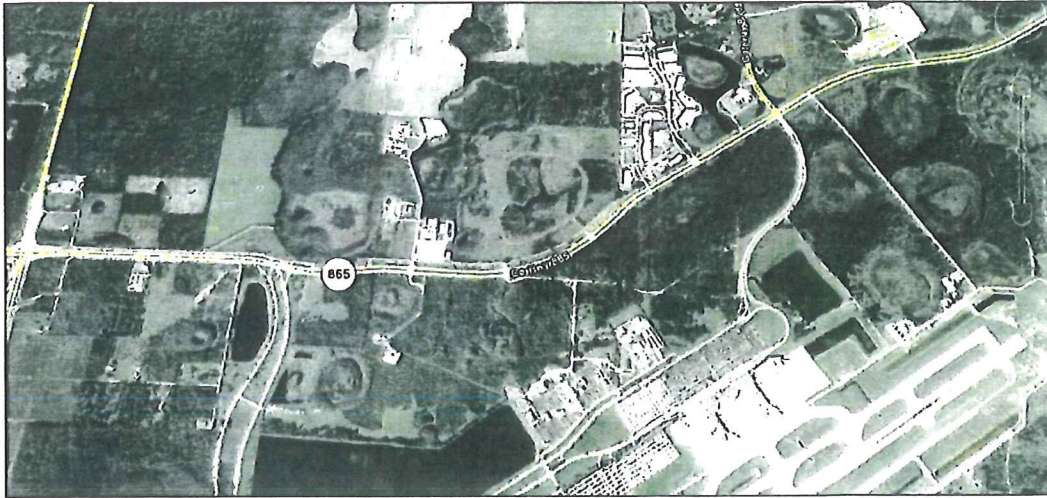
SOUTHWEST FLORIDA INTERNATIONAL AIRPORT TOTAL PASSENGER ACTIVITY, 1983 - 2009			
Year	Total Passengers	Notes	Average Annual Growth Rate %
1983	544,636	moved from Page Field	
1984	1,311,937		140.9%
1985	1,701,969		29.7%
1986	2,129,548		25.1%
1987	2,687,053		26.2%
1988	3,115,124		15.9%
1989	3,231,092		3.7%
1990	3,734,067		15.6%
1991	3,436,520		- 8.0%
1992	3,472,661		1.1%
1993	3,717,758	named Southwest Florida International Airport	7.1%
1994	4,005,067		7.7%
1995	4,098,264		2.3%
1996	4,317,347		5.3%
1997	4,477,865		3.7%
1998	4,667,207		4.2%
1999	4,897,253		4.9%
2000	5,207,212		6.3%
2001	5,277,708		1.4%
2002	5,185,648		- 1.7%
2003	5,891,668	moved to new terminal	13.6%
2004	6,736,630		14.3%
2005	7,518,169		11.6%
2006	7,643,217		1.7%
2007	8,049,676		5.3%
2008	7,603,845		- 5.5%
2009	7,415,958		- 2.5%
Average Annual Growth Rate 1983 - 2009			10.6%

Source: Lee County Port Authority Department of Public Relations; Real Estate Research Consultants, Inc.

Site Description and Context

RERC's analysis of supportable land uses pertains to the RSW non-aviation future development north of Runway 6-24 which is located in east central Lee County, Florida. The development opportunity is approximately 815+/- acres in size and generally lies east of Interstate 75, south of Daniels Parkway, and north of the RSW midfield terminal complex. The planned and approved Boston Red Sox training complex and existing Gateway DRI border the property to the north. The following aerial generally depicts the area of analysis as described.

Subject Site: RSW non-aviation future development north of Runway 6-24



The property is located in Lee County and the County's Growth Management Plan (GMP), known as The Lee Plan, governs the use of the property through policies, standards and the Future Land Use Map. Currently the property is designated as the "Airport Lands" Future Land Use Category which allows for aviation and non-aviation uses as depicted in the Airport Layout Plan (Map 3F) and as identified in the Airport Development Schedule (Table 5(a)). This analysis was initiated to determine the market supportability of development at the subject property to support a Comprehensive Plan Amendment, as merited, to reflect and accommodate evolving market conditions and future development in this emerging area of the County. The airport property is currently zoned Airport Operations Planned Development (AOPD). These governing concepts were taken into consideration when analyzing the market supportability.

Market Analysis and Needs Assessment

RERC uses proprietary demand models customized to each real estate sector and to local market conditions to project future demand. These gravity models are based on fair share allocation of future growth and associated demand. While demand is an important metric to understand, total market need is essential to define for long-term planning purposes.

Application of 25% Market Factor

To that end, RERC applied a 25% market factor to the incremental, supportable on-site demand generated by its proprietary models for all sectors during the 2010 to 2030 planning horizon in order to allow for flexibility within the market. This market factor is aligned with State of Florida Department of Community Affairs standards and has been commonly applied for this same purpose by many applicants for comprehensive plan amendments according to a Florida Senate report in October 2009. The 25% market factor is applied to incremental demand exclusively to provide market flexibility in the addition of new space across sectors. Total market demand is cumulative through the specified time horizon and includes existing demand present at the base year. RERC has assumed current land inventories for the analyzed uses are in equilibrium include a portion of inventory that already exists for market flexibility.

Increasing demand 25% over base incremental projections allows for diversity in the market so that an interested tenant has several suitable spaces from which to select the best fit. Beyond market flexibility alone, this multiplier is also appropriately applied when a subject site is uniquely positioned within the community, like an airport, as an economic engine, source of job growth and creation, or enterprise gateway. Here, public policy may justify the application of a market factor in order to set, promote, and achieve worthy goals within a community such as infill development adjacent to catalytic projects or higher intensity development in a particular area to optimize the use of community infrastructure.

Ultimately, the application of a market factor helps to better position a community to respond flexibly to changing market conditions and needs of potential businesses/operations by offering diversification in geography, modal access and product types.

Planned, Proposed and Under Construction Projects

A number of planned, proposed, or under construction projects exist throughout the South Fort Myers submarket and relevant trade area. RERC has identified significant projects designated as Developments of Regional Impact (DRI) or Planned Developments (PD) within the vicinity of RSW and considered the impact of these projects on the subject site's ability to capture supportable demand and corresponding need. The recently approved Red Sox Spring Training Facility complex, located directly across Daniels Parkway from the subject property, is perhaps the most influential project within the area concerning the future of the subject site. Because this development influences all of the real estate sectors analyzed, it is addressed here. Other planned, proposed, and under construction projects-of-note are specifically addressed by sector and included in the relevant sections in this document.

The Boston Red Sox have called the Fort Myers area home to their spring training operations for more than 15 years. Since coming to the area in 1993, the team has occupied City of Palms Park, a 7,500 seat stadium. Practice fields and other team facilities are located several miles away. The Lee County Commission, as well as other key entities, recognized the importance of retaining the team in the area and worked to secure this catalytic opportunity through the incentive of a new state-of-the-art stadium facility in an emerging area of Fort Myers. The new Red Sox site is located on the north side of Daniels Parkway immediately adjacent the subject RSW property to its south. The county has made the development of this regional project a priority, committing to cover an estimated \$75 to \$80 million in project costs. The county investment includes the purchase of the 106-acre stadium site from Waterman-Pinnacle for \$20 million. The project includes an additional 20 acres for commercial outparcel development. The complex will include an 11,000 seat stadium with the potential to expand to 12,000 seats, six practice fields, a wellness and fitness center, and other team-related facilities. Plans for retail, restaurant, and office space of approximately 425,000 square feet and a 150-room hotel are also included in the development program at the new Red Sox site.

Spring training facilities like the forthcoming Red Sox complex are scattered throughout the state of Florida and are part of the Florida Grapefruit League, hosting major league teams from a variety of US cities for a few months before the regular season begins. RERC researched and analyzed these stadiums and surrounding areas to understand their development implications and operational impact on the localized communities in which they are located. The following table presents a summary of general information and provides locational context for each stadium considered.

FLORIDA GRAPEFRUIT LEAGUE SPRING TRAINING FACILITIES								
Name	Teams	Location	Year Built	Year Reno	Capacity	Adjacent Land Uses	Locational Context	Comments
Disney's Wide World of Sports Complex	Atlanta Braves	Lake Buena Vista	1996		9,500	N/A	on Disney property	
Ed Smith Stadium	Baltimore Orioles	Sarasota	1989	future	7,500	institutional (academic, gov't, civic), residential neighborhood, commercial, neighborhood retail, industrial/flex.	Suburban	elementary school, parks/rec venues, state offices, multifamily and townhomes, limited service restaurants, construction supply stores
City of Palms Park	Boston Red Sox	Fort Myers	1992		7,535	institutional (gov't, civic, religious), small-scale commercial, flex/office, parking garage, residential neighborhood	Urban Neighborhood	Red Sox relocating; County/State offices, Skatium, park, churches
Joker Marchant Stadium	Detroit Tigers	Lakeland	1966	2002	8,500	institutional (gov't, civic, religious), residential neighborhood, commercial (auto), neighborhood retail, flex/office	Urban Neighborhood	Post office, park, churches, car dealerships; Spring Training complex/area known as Tigertown
Roger Dean Stadium	Florida Marlins & St. Louis Cardinals	Jupiter	1998		6,806	institutional (academic, R&D), mixed-use town center: retail, residential, services, restaurant; parking garages, residential developments	Suburban	FL Atlantic University-MacArthur Campus opened Fall 1999. Scripps Research Institute located on campus; Town Center built in 2000
Osceola County Stadium	Houston Astros	Kissimmee	1984	2002	5,300	institutional (gov't, civic, academic), flex/office, residential neighborhood, commercial, small-scale retail and restaurant.	Suburban	Osceola Heritage Park. Parks and Rec. Dept. Florida Christian College, K-12 schools, hotel/motel, car dealerships, self storage, gas stations
Hammond Stadium at Lee County Sports Complex	Minnesota Twins	Fort Myers	1991		7,500	institutional (academic), neighborhood shopping center, convenience retail, flex/office, residential neighborhood nearby	Suburban	K-12 schools; grocery stores, banks, restaurants, drug stores, gas stations
Thomas J. White Stadium	New York Mets	Port St. Lucie	1988	2003	7,347	institutional (academic, religious), flex/industrial, residential neighborhoods nearby	Suburban	Indian River State College/FAU Treasure Coast campus, K-12 schools, churches
Steinbrenner Field	New York Yankees	Tampa	1996		11,076	institutional (airport, civic, academic, religious), commercial, restaurants, residential nearby	Infill	Tampa International Airport, Raymond James Stadium, K-12 schools, churches

FLORIDA GRAPEFRUIT LEAGUE SPRING TRAINING FACILITIES								
Name	Teams	Location	Year Built	Year Reno	Capacity	Adjacent Land Uses	Locational Context	Comments
Bright House Field	Philadelphia Phillies	Clearwater	2004		7,200	residential neighborhoods, community retail centers, restaurants, car dealerships, hotel/motel, flex/office	Infill	located along major corridor; Spring Training complex, known as Carpenter Complex, pre-date stadium
McKechnie Field	Pittsburgh Pirates	Bradenton	1923	1992	6,562	institutional (gov't, civic, academic, religious), restaurants, small-scale commercial (auto-related: car lots, repair, rental services), social services, residential neighborhoods	Urban Neighborhood	City Public Works, Boys & Girls Club offices, K-12 schools, churches, County detention center, recent Hope VI mixed income housing development
Charlotte Sports Park	Tampa Bay Rays	Port Charlotte	1988	2009	6,823	institutional (civic), small-scale commercial	Rural	county fair grounds, single story flex space, Harley-Davidson dealership
Dunedin Stadium	Toronto Blue Jays	Dunedin	1930	2002	5,510	institutional (gov't, civic, academic), residential neighborhood, small-scale commercial	Urban Neighborhood	County School Admin offices, public library, VFW hall, downtown 1-mile north; stadium shared with local high school team
Space Coast Stadium	Washington Nationals	Melbourne	1993	2008	8,100	institutional (gov't, hospital, academic, religious), residential developments	Rural/Suburban Edge	County School Admin offices, VA hospital, K-12 schools, several churches

Source: The Florida Sports Foundation, Florida Grapefruit League, Major League Baseball, Real Estate Research Consultants, Inc.

Implications

By examining these statewide facilities and their immediate surrounds, RERC found sports complexes like spring training stadiums and facilities generally do not by themselves generate substantial surrounding development or demand for development, but instead may serve as the impetus for carefully positioned and coordinated planning and partnerships for development of adjacent properties.

Naturally, stadiums try to meet general user demand internally in order to keep as much consumer expenditure on site as possible, which limits the supportability of off-site uses directly tied to stadium-generated demand. Further, sports complexes do not operate (and therefore generate demand) as consistently as other market drivers such as households or employment centers. Clearly, potential tenants considering any site location must be able to count on sustained and even growing demand from a stable source of likely consumers. In other words, a restaurateur cannot run an establishment based on a customer base present only 80 nights out of the year.

Therefore, RERC considered the catalytic impact of the Red Sox stadium complex development as well as prevailing sustained demand from existing and future household formation and other economic development initiatives for job growth and creation. Accordingly, adjacent development must be specifically tailored to address identified market demand and corresponding need and as a result may not directly link with stadium use but be positioned

toward neighborhood and residential needs instead. This serves only to emphasize the importance of targeted and coordinated investment by key stakeholders in the surrounding community in order to advance the Red Sox complex from simple project into true catalyst for development in the adjacent area.

OFFICE MARKET DEMAND

The Cape Coral-Fort Myers MSA has approximately 20.6 million square feet of office inventory and as of year-end 2009 continues to experience increases in office vacancy even though lease rates now appear to be stabilizing and edging slightly higher. Almost 950,000 square feet of office buildings were added to the MSA office inventory in 2007, along with another 1,035,000 square feet in 2008. Approximately 460,000 square feet of new space was constructed in the general market during 2009.

The following table presents historical year-built office space inventory by decade for the MSA according to the Lee County Property Appraiser.

PROFESSIONAL OFFICE SPACE INVENTORY BY PERIOD						
Cape Coral - Fort Myers MSA						
	Prior to 1970	1970-79	1980-89	1990-99	2000-08	Total
MSA Total SF	2,142,147	2,298,799	4,917,577	4,268,196	6,931,427	20,558,146
% of Total	10.42%	11.18%	23.92%	20.76%	33.72%	

Source: Lee County Property Appraiser, Real Estate Research Consultants, Inc.

According to commercial brokers familiar with the local area, several significant additions were made to the MSA's office inventory by the end of 2009. These included a 46,000 square foot office building at Six Mile Corporate Park and an office project at 3400 Lee Boulevard totaling 32,000 square feet.

In order to better understand patterns of market demand, RERC identified submarkets within the metro area. The subject property falls within the South Fort Myers submarket as presented earlier in the submarket conditions section of this document. Presently, the South Fort Myers office submarket accounts for approximately 43% of total MSA inventory.

Observations made in the submarket during fieldwork conducted in January and February of 2010 include identification of office development concentrations in the Summerlin Road, College Parkway and Colonial Boulevard corridors which represent mature development areas with opportunities for in-fill projects. The Metro Parkway and Plantation Road areas were identified as emerging areas for office development, while the Gateway vicinity appears well-positioned for future development of office product. The prevailing scale of office development in the MSA centers around two- to three-story office product with a significant use of one-story buildings for office uses as well. The most intense privately-developed office product is concentrated proximate the intersection of Summerlin Road and College Parkway and generally takes the form of five- to six-story buildings with very rare low-rise structured or more prevalent surface parking. The area's office product generally serves the medical, professional and banking/insurance user groups. Class A buildings in the submarket generally average 30,000 to 60,000 square feet with only six identified exceptions larger than 65,000 square feet.

Office demand is driven largely by growth in employment categories that actually utilize office space for business operations. In order to estimate future needs for office space within the metro area, RERC has reviewed trends in relationships between office-using employment and occupied office space determined through local surveys. The following table presents the projected demand and corresponding need estimates through 2030 for the MSA with allocations made to the South Fort Myers submarket.

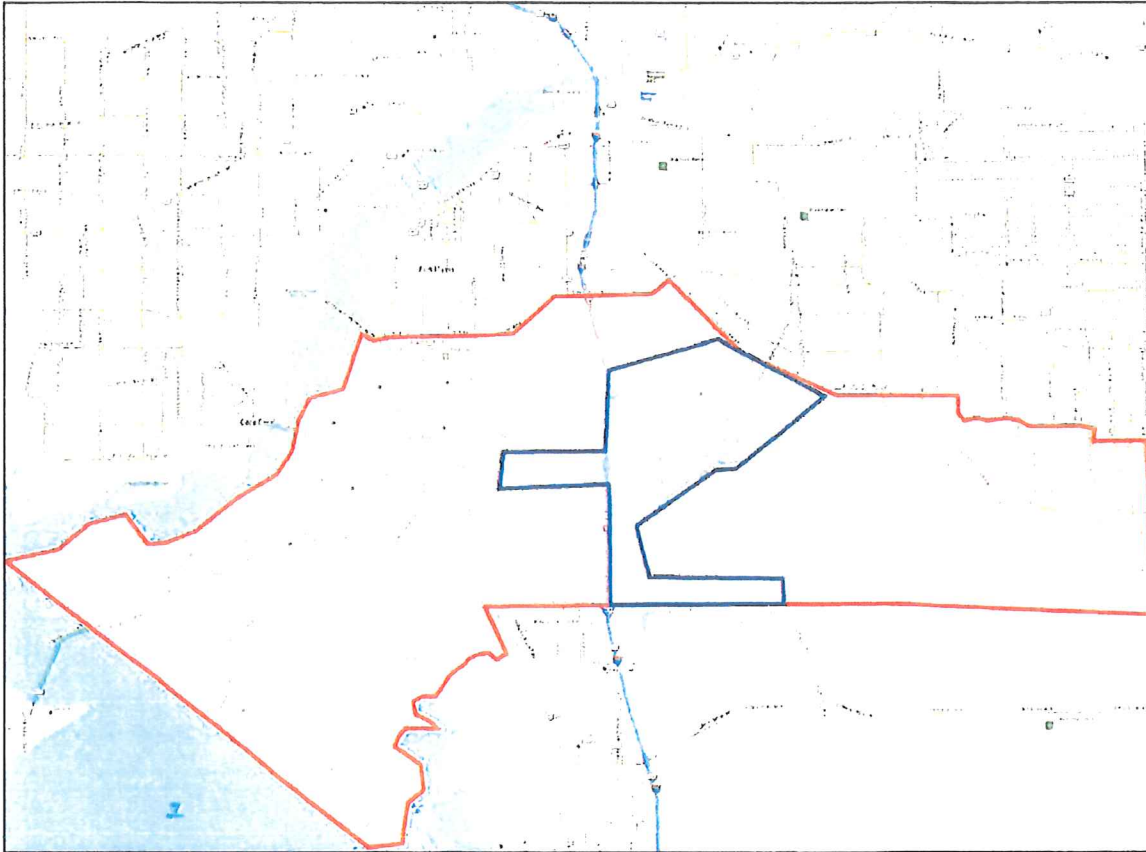
OFFICE MARKET DEMAND & CORRESPONDING NEED PROJECTIONS, 2010-2030			
Cape Coral - Fort Myers MSA and South Fort Myers Submarket			
(in square feet)	2009	2010 - 2030	
	Existing Demand	Total Market Demand	Total Market Need*
Total Inventory Demanded by Period			
MSA Total SF	20,558,146	29,558,532	31,808,629
S. Fort Myers Submarket Total SF	8,789,814	14,779,266	16,276,629
Incremental Demand[^]			
MSA Total SF		9,000,386	11,250,483
S. Fort Myers Submarket Total SF		5,989,452	7,486,815
* reflects application of 25% market factor			
[^] Due to projected negative absorption of square feet in other submarkets within the MSA, the incremental demand projected for the South Fort Myers submarket appears to be a larger portion of total MSA additions than otherwise would be expected during stabilized market conditions.			

Source: Real Estate Research Consultants, Inc., Woods and Poole Employment Projections 2010, Lee County Property Appraiser, Third Party Commercial Broker Quarterly Reports

Nearly 7.5 million square feet of new incremental office need is projected for the South Fort Myers submarket, which includes the subject property. This projection reflects an average of about 375,000 square feet per year, or roughly 67% of the incremental metro market general office space need. Realistically, recent emerging economic development initiatives around RSW, such as the new Red Sox spring training facility, FGCU growth and development, and the planned future airport interchange with I-75, could generate more significant interest in office space and related facilities within the submarket over the long term.

To examine the office potential for the subject property, RERC divided the South Fort Myers Submarket into trade areas based on geography and past and anticipated development patterns. The map that follows illustrates the subject property's trade area within the South Fort Myers submarket.

South Fort Myers Submarket and Subject Trade Area



Source: Delorme 2010, Third Party Commercial Broker Quarterly Reports, Real Estate Research Consultants, Inc.

The relevant office trade area for the subject property generally includes areas east and west along and north of Daniels Parkway, the property fronting Treeline, and the north side of Alico Road east of I-75.

RERC has allocated future projected office demand and corresponding need within the South Fort Myers submarket to the subject trade area as follows:

OFFICE INCREMENTAL DEMAND & CORRESPONDING NEED ALLOCATIONS		
Submarket and Trade Area		
Area	2010-2030	
	Market Demand	Total Market Need*
South Fort Myers Submarket (SF)	5,989,452	7,486,815
Trade Area (SF)	1,777,689	2,222,111

* reflects application of 25% market factor

Source: Real Estate Research Consultants, Inc., Woods and Poole Employment Projections 2010, Lee County Property Appraiser, Third Party Commercial Broker Quarterly Reports

These allocation estimates were based on several factors:

- The evolving growth pattern east and south within the submarket.
- The anticipated catalytic effect of the Boston Red Sox Complex.
- The scale and location of DRI and PD-level office entitlements in the submarket, trade area, and subject site vicinity as detailed in the following table.

ACTIVE & PENDING DRI APPROVALS FOR OFFICE DEVELOPMENT			
RSW Vicinity			
Developments	Office Square Feet *		
Existing	Approved	Built	Remaining
Alico Interchange Park	750,000	-	750,000
Arborwood	-	-	-
Gateway Community	1,674,500	335,473	1,339,027
Gulf Coast Towne Center	80,000	-	80,000
Jetport-Interstate Commerce Park	-	-	-
Miromar Lakes	340,000	-	340,000
Sun City, Fort Myers	200,000	-	200,000
The Forum	856,040	60,000	796,040
Total SF	3,900,540	395,473	3,505,067
Pending / In Process			Total
Florida Gulf Coast Technology & Research Park			400,000
Lee Co. Red Sox Ballpark & Spring Training Facility			50,000
Millennium Corporate Park			1,200,000
Premier Airport Park			120,000
Note: office DRI data as supplied by Southwest Florida Regional Planning Council and available/current in February 2010			
* recent substantial deviation			
^ formerly portion of Omni Interstate Park			

Source: Annual Reports for Active DRIs & Pending DRI Applications: Southwest Florida Regional Planning Council; Real Estate Research Consultants, Inc.

A variety of factors can affect the subject property's ability to capture demand, including competitive inventory and office sites within the trade area. We have allocated approximately 2.2 million square feet of office need to the trade area.

The following table presents the portion of projected demand and corresponding need allocated to the subject site from the total amount designated to the trade area.

OFFICE INCREMENTAL DEMAND & CORRESPONDING NEED ALLOCATION		
Subject Site		
Area	2010-2030	
	Market Demand	Total Market Need*
On-site (SF)	350,000	437,500

* reflects application of 25% market factor

Source: Real Estate Research Consultants, Inc., Woods and Poole Employment Projections 2010, Lee County Property Appraiser, Third Party Commercial Broker Quarterly Reports

Demand and corresponding need for office space at the subject property is dependent on the evolving nature of the Red Sox complex and the FGCU campus and surrounds as well as the continued development of RSW as an economic gateway to Southwest Florida.

INDUSTRIAL SPACE DEMAND

The MSA has approximately 35.5 million square feet of industrial inventory and as of year-end 2009 continues to experience increases in industrial vacancy and declines in lease rates. Almost 1.5 million square feet of industrial buildings were added to the MSA's inventory in 2007, along with another nearly 1.7 square feet in 2008. Approximately 155,000 square feet of new space was constructed in the general market during 2009.

The following table presents historical year-built industrial space inventory by decade for the MSA according to the Lee County Property Appraiser.

INDUSTRIAL SPACE INVENTORY BY PERIOD						
Cape Coral - Fort Myers MSA						
	Prior to 1970	1970-79	1980-89	1990-99	2000-08	Total
MSA Total SF	2,986,566	5,488,389	8,264,383	6,252,008	12,526,226	35,517,572
% of Total	8.41%	15.45%	23.27%	17.60%	35.27%	

Source: Lee County Property Appraiser, Real Estate Research Consultants, Inc.

According to commercial brokers familiar with the local area, the following significant additions were made to the industrial inventory in the MSA by the end of 2009:

- Daniels Parkway Business Center, Buildings A and B: total of 55,000 square feet
- Calusa Industrial Building: 22,500 square feet
- Frito-Lay Distribution Center: 35,000 square feet
- 17102 Alico Center Rd: approximately 11,000 square feet

The subject property falls within the same South Fort Myers submarket as defined for the office analysis. Presently, the South Fort Myers industrial submarket accounts for approximately 40% of total MSA inventory.

Observations made in the submarket during fieldwork conducted in January and February of 2010 include identification of existing and large vacant industrial development and land concentrations along West Alico Road and U.S. 41. The Six Mile Cypress Parkway, Metro Parkway and Plantation Road areas were identified as existing and emerging areas for industrial development while the Treeline Avenue, Gateway and East Alico Road corridors appear well-positioned for future development of industrial product given the product developed to date and available vacant industrial lands. The prevailing scale of industrial development in the MSA includes one-story buildings with high bays that are surface parked, and newer buildings delivered to the market range in size from 20,000 to 40,000 square feet with few exceptions.

Future needs for industrial space were calculated for the relevant submarket using the RERC model that estimates demand for industrial space in relationship to metro area (MSA) industrial employment. As in the office analysis, the subject property is located in the South Fort Myers Submarket of the MSA. Industrial demand is driven largely by growth in employment categories that actually utilize industrial space for business operations. In order to estimate future needs for industrial space within the MSA, RERC has reviewed trends in relationships between industrial employment and occupied industrial space determined through local surveys.

The following table summarizes the projected demand and corresponding need estimates through 2030 developed by RERC for industrial demand in the MSA with allocations made to the South Fort Myers submarket.

INDUSTRIAL MARKET DEMAND & CORRESPONDING NEED PROJECTIONS, 2010-2030			
Cape Coral - Fort Myers MSA and South Fort Myers Submarket			
(in square feet)	2009	2010 - 2030	
	Existing Demand	Total Market Demand	Total Market Need*
Total Inventory Demanded by Period			
MSA Total SF	35,517,572	40,748,361	42,056,058
S. Fort Myers Submarket Total SF	13,770,696	20,985,405	22,789,082
Incremental Demand^			
MSA Total SF		5,230,789	6,538,486
S. Fort Myers Submarket Total SF		7,214,709	9,018,386
* reflects application of 25% market factor			
^ Due to projected negative absorption of square feet in other submarkets within the MSA, the incremental demand projected for the South Fort Myers submarket appears to be a larger portion of total MSA additions than otherwise would be expected during stabilized market conditions.			

Source: Real Estate Research Consultants, Inc.. Woods and Poole Employment Projections 2010. Lee County Property Appraiser, Third Party Commercial Broker Quarterly Reports

- In total, the MSA's industrial space market is projected to expand to just more than 42 million square feet over the next 20 years.
- Based upon approved and proposed development within major real estate projects known at this time, the most substantial growth market will be the South Fort Myers submarket.
- Much of the submarket's growth will likely be driven by RSW, I-75 access, and FGCU-related development.
- Given the already approved and proposed level of industrial development within major real estate projects in the vicinity – combined with housing supply and planned transportation improvements – the submarket is poised to be the dominant industrial market in the metro area for the next 20 years or more.
- Due to projected negative absorption of square feet in other submarkets within the MSA, the incremental demand projected for the South Fort Myers submarket appears to be a larger portion of total MSA additions than otherwise would be expected during stabilized market conditions.

Approximately nine million square feet of net industrial need is projected for the submarket, which includes the subject property. This projection reflects an average of about 450,000 square feet per year for general industrial space. This demand will be generated by more traditional industrial users such as distribution and warehousing and the high tech and bio-tech industries that are anticipated to grow in this area.

To examine the industrial potential for the subject property, RERC divided the South Fort Myers Submarket into trade areas based on geography and past and anticipated development patterns. The industrial submarket and trade area maintain the same boundaries as the trade area and submarket defined for professional office demand.

RERC has allocated future projected industrial demand and corresponding need within the South Fort Myers submarket to the trade area as follows:

INDUSTRIAL INCREMENTAL DEMAND & CORRESPONDING NEED ALLOCATIONS		
Submarket and Trade Area		
Area	2010-2030	
	Market Demand	Total Market Need*
South Fort Myers Submarket (SF)	7,214,710	9,018,388
Trade Area (SF)	3,101,141	3,876,426

* reflects application of 25% market factor

Source: Real Estate Research Consultants, Inc., Woods and Poole Employment Projections 2010, Lee County Property Appraiser, Third Party Commercial Broker Quarterly Reports

These allocation estimates were based on several factors:

- The anticipated catalytic effect of the Boston Red Sox Complex.
- The anticipated gain in market share by the trade area as the build-out of more mature market areas occurs.
- The growth and future development of RSW as a transportation hub and planned ground transportation facilities.
- The supply of entitled and available land in the trade area.
- The scale and location of DRI and PD-level industrial entitlements in the relevant submarket, trade area, and vicinity, as summarized in the following table.

ACTIVE & PENDING DRI APPROVALS FOR INDUSTRIAL DEVELOPMENT			
RSW Vicinity			
Developments	Industrial Square Feet		
Existing	Approved	Built	Remaining
Alico Interchange Park	-	-	-
Arborwood	-	-	-
Gateway Community	-	-	-
Gulf Coast Towne Center	-	-	-
Jetport-Interstate Commerce Park	864,989	530,569	334,420
Miromar Lakes	40,000	-	40,000
Sun City, Fort Myers	-	-	-
The Forum	-	-	-
Total SF	904,989	530,569	374,420
Pending / In Process			Total
Florida Gulf Coast Technology & Research Park			2,897,000
Lee Co. Red Sox Ballpark & Spring Training Facility			-
Millennium Corporate Park			1,200,000
Premier Airport Park			1,711,248

Note: industrial DRI data as supplied by Southwest Florida Regional Planning Council and available / current in February 2010

* recent substantial deviation

^ formerly portion of Omni Interstate Park

Source: Annual Reports for Active DRIs & Pending DRI Applications: Southwest Florida Regional Planning Council; Real Estate Research Consultants, Inc.

Within the trade area, a variety of factors can affect the subject property's ability to capture demand, including competitive inventory and other industrial sites. We have allocated approximately 3.9 million square feet of industrial need to the trade area.

Based on the number of industrial concentrations/properties in the trade area, we project on-site capture of demand and corresponding need as follows:

INDUSTRIAL INCREMENTAL DEMAND & CORRESPONDING NEED ALLOCATION		
Subject Site		
Area	2010-2030	
	Market Demand	Total Market Need*
On-site (SF)	510,000	637,500
* reflects application of 25% market factor		

Source: Real Estate Research Consultants, Inc., Woods and Poole Employment Projections 2010, Lee County Property Appraiser, Third Party Commercial Broker Quarterly Reports

Demand for industrial space at the subject property is dependent on both the future growth of the overall metro market in the mid- and long-term as well as the evolution of catalytic development associated with the Boston Red Sox and FGCU.

In compliance with the Lee Plan's Table 5(a), which details current entitlements at the subject property, RERC allocated on-site projected industrial market need between two specified industrial segments: light manufacturing/assembly and warehouse/distribution. To allocate industrial need appropriately, RERC researched existing allocations of industrial employment by NAICS codes to existing market inventory and sector-specific space requirements and applied the same relationship for future need distribution among industrial building types. The following table summarizes allocated on-site market need by industrial subcategory.

INDUSTRIAL SPLIT OF INCREMENTAL DEMAND & CORRESPONDING NEED ALLOCATION		
Subject Site		
Industrial Segment	2010-2030	
	Market Demand	Total Market Need*
Light Manufacturing/Assembly (SF)	198,000	247,500
Warehouse/Distribution (SF)	312,000	390,000
Total Industrial (SF)	510,000	637,500
* reflects application of 25% market factor		

Source: Real Estate Research Consultants, Inc., Woods and Poole Employment Projections 2010, Lee County Property Appraiser, Third Party Commercial Broker Quarterly Reports

RETAIL AND SERVICE SPACE DEMAND

At year-end 2009, the Cape Coral-Fort Myers MSA had approximately 38.2 million square feet of retail inventory, which continues to experience increasing rates of retail vacancy and declining rental rates. Approximately 2 million square feet of retail space was added to the MSA's retail inventory in 2007 with another 2.3 million square feet added the following year as well. However, retail space additions in the metro market fell sharply in 2009 totaling only 380,000 square feet for the year. Despite the recent decline in retail space construction, more than one-third of all retail inventory in the MSA was added in this past decade.

According to commercial brokers familiar with the local area, the following significant additions were made to the MSA retail inventory by year-end 2009:

- Village Shoppes at Health Park: 113,000 square feet
- 9601 Six Mile Cypress Parkway: approximately 79,000 square feet
- Twins Central: 50,000 square feet
- 19451 South Tamiami Trail: 25,000 square feet
- 13195 Metro Parkway: approximately 25,000 square feet
- Majorca Palms: 20,000 square feet

RETAIL SPACE INVENTORY BY PERIOD						
Cape Coral - Fort Myers MSA						
	Prior to 1970	1970-79	1980-89	1990-99	2000-08	Total
MSA Total SF	4,303,026	5,244,264	6,486,431	8,703,553	13,493,730	38,231,004
% of Total	11.26%	13.72%	16.97%	22.77%	35.30%	

Source: Lee County Property Appraiser, Real Estate Research Consultants, Inc.

Observations made in the submarket during fieldwork conducted in January and February of 2010 include identification of retail, restaurant and services concentrations in the mature U.S. 41 corridor and emerging around intersections along Daniels Parkway and Six Mile Cypress Parkway. Two established indoor regional shopping malls along U.S. 41 are within the submarket. In addition, two regional lifestyle destination developments that lie adjacent the submarket boundary include the Gulf Coast Town Center (southern boundary) and The Forum (northern boundary), both of which have existing development with area for expansion. While beyond the submarket boundary, the Coconut Point Town Center in Estero is another significant regional development. Given job growth and household formation patterns to the east and south within the MSA, future retail, restaurant and services growth areas will likely include the East Daniels Parkway area in the vicinity of the Boston Red Sox Complex/Gateway DRI and the University-Estero area. The prevailing scale of retail development in the MSA centers around the regional developments indicated here as well as single story community and neighborhood shopping centers typically found in commercial corridor settings.

Methodology

To determine demand for the 2010 to 2030 planning period for retail, restaurant and services space at the subject site, RERC used its proprietary models employing relevant market data and observed market conditions. RERC's retail and restaurant models are gravity models that address retail and restaurant choices and spatial concentrations of spending. The models were calibrated based on the most recent economic census data for the Fort Myers metro area. The models generate the amount and the nature of retail and restaurant space supportable within a given trade area based upon the number of households and the average household's effective buying income at a given point in time. RERC's services model employs a methodology for estimating service space demand by incorporating population growth, employment, and the number of establishments for different service facility types, all within a specific physical construct. The following retail, restaurant, and services categories are considered and analyzed.

- | | |
|---|---------------------------------|
| ▪ Department stores & general merchandise | ▪ Appliances & electronics |
| ▪ Discount stores | ▪ Building materials & hardware |
| ▪ Furniture & home furnishings | ▪ Apparel & accessories |

- Miscellaneous retail stores
- Food stores & supermarkets
- Beer, wine & liquor
- Drug stores & pharmacies
- Convenience stores & gasoline
- Cosmetic, Health, & Beauty
- Full service restaurants
- Limited service restaurants
- Specialty food service
- Drinking places
- Finance, Insurance, & Real Estate
- Personal services
- Medical services
- Legal services
- Social services
- Professional & business services

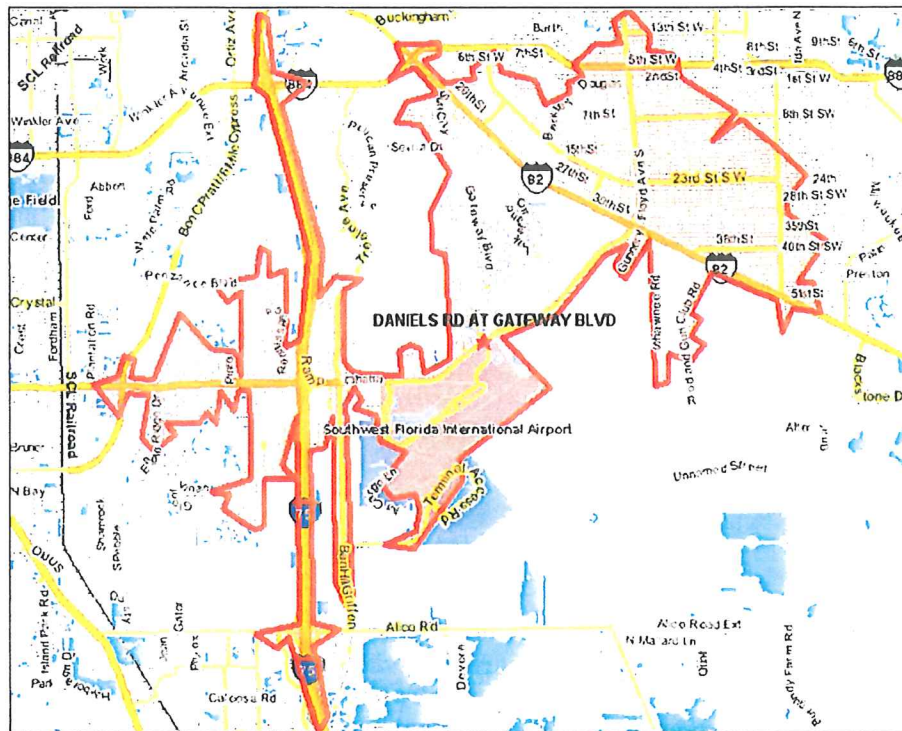
Applying its proprietary models, RERC identified overall potential market demand generated in the relevant trade area for three market segments (regional, community, and neighborhood) by the households within the trade area. Regional retail centers are generally more than 300,000 square feet in size and draw consumers from a larger market basin and serve as destinations such as large-scale enclosed and outdoor shopping malls. Typically anchored by full service grocery or junior anchor stores and generally 150,000 square feet in size, community centers draw demand from a more localized market basin of approximately two- to three-miles. Neighborhood centers, which average 50,000 square feet in size, draw from the immediate surrounding area, typically within a one-mile radius, and provide everyday convenience goods and services.

The Retail and Services Trade Area

RERC employs trade area analysis to project future allocations of market demand to specific limited geographic areas. A trade area is defined as a geographic area from which one can expect the primary demand for a specific product or service provided at a fixed location. RERC's defined trade area for the 2009 retail sector includes a ten-minute drive time surrounding the subject site, which extends from Daniels Parkway north and south along Interstate 75, terminating in either direction at the doorstep of the two newest and largest regional lifestyle shopping centers in the MSA.

After thorough consideration and market fieldwork in both the trade area and surrounding metro area, this particular trade area was selected given the potential for on-site capture of demand is greatest for retail uses at the community level (e.g. grocery or junior anchored shopping centers) and neighborhood level (e.g. small convenience shopping centers) as opposed to regional destination uses (e.g. regional indoor/outdoor shopping malls or lifestyle centers). Hence, the 2009 trade area represents the ten minutes area residents are willing to drive to acquire desired everyday goods and services. The following map presents the current ten-minute drive time as defined.

2009 Trade Area: Ten-minute drive time



Source: Claritas 2010, Real Estate Research Consultants, Inc.

RERC analyzed existing demographic trends to define the trade area's socioeconomic context and compare its characteristics to the ten-minute drive times surrounding three major retail concentrations in the submarket, two of which are more recent developments and the other is well established and considered a mature market.

The drive-time trade area shows evidence of an emerging market with the highest average annual growth rate in both population and households over the past ten years of the four areas compared. The trade area, like the two newer suburban retail concentrations, observes a considerably larger average household size of just more than two-and-a-half persons per household than that of the mature retail market of the U.S. 41 area.

Further, a majority of housing units in the trade area were built within the last decade. The trade area also has a greater percentage of owner-occupied housing units and a higher median home value than the other markets. Household income in the drive-time trade area is higher relative to the comparable retail concentrations.

Consumer expenditure trends further identify the trade area as an emerging market. Consumer spending in the 2009 trade area is approximately one-third of what was spent in the mature US 41 retail area. This disparity between the emerging and established areas highlights the considerable opportunity for growth in the trade area market and what this market might do in the future in terms of retail expenditure and supported development within the metro area.

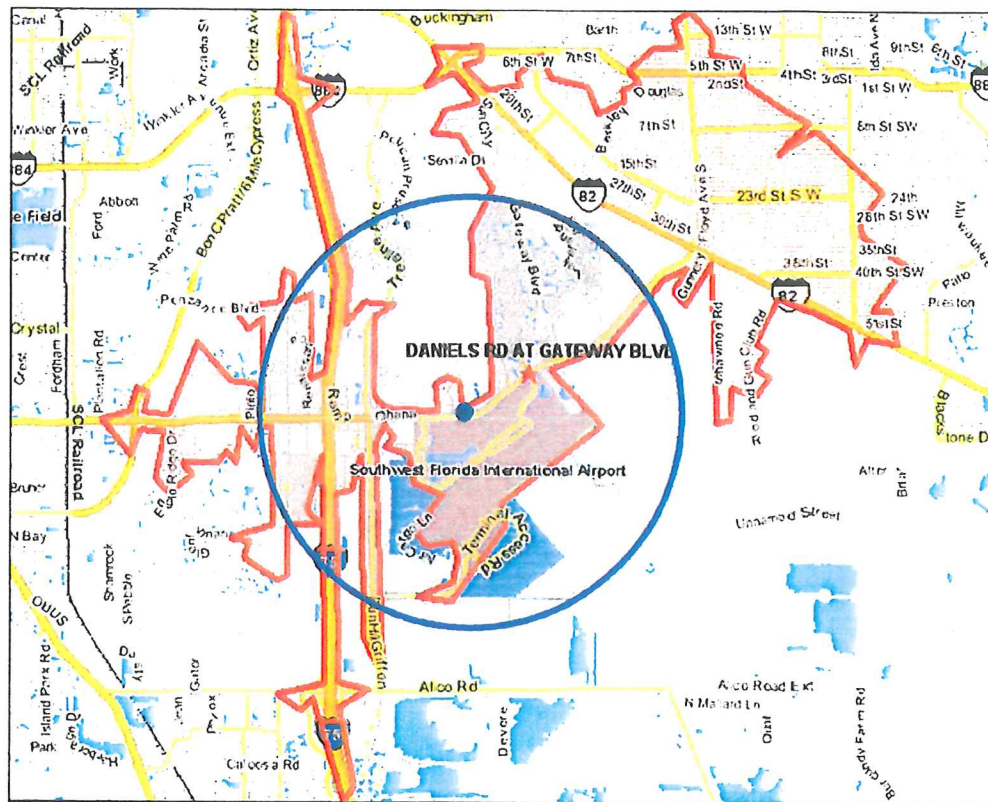
DEMOGRAPHIC TRENDS					
10-minute Drive Time Surrounding:		Subject Site	Gulf Coast TC	The Forum	US 41 Retail
Population	2000 Census-based	10,096	28,891	54,309	67,463
	2009 Estimated	30,289	40,146	83,060	85,591
	Historical Annual Growth 2000 to 2009	13.0%	3.7%	4.8%	2.7%
Households	2000 Census-based	3,847	11,345	20,400	31,288
	2009 Estimated	11,470	15,886	32,283	40,680
	Historical Annual Growth 2000 to 2009	12.9%	3.8%	5.2%	3.0%
Average Household Size		2.6	2.5	2.6	2.1
Household Income	2009 \$0 - \$49,000	28.5%	36.3%	57.3%	53.1%
	\$50,000 - \$74,999	20.3%	25.4%	17.2%	21.7%
	\$75,000 - \$99,999	14.8%	16.6%	10.0%	10.6%
	\$100,000 - \$149,999	18.6%	13.6%	9.1%	8.6%
	\$150,000 or more	17.8%	8.0%	6.4%	6.1%
	Median Household Income	\$ 77,017	\$ 62,286	\$ 43,074	\$ 47,216
	Average Household Income	\$ 104,231	\$ 78,060	\$ 61,208	\$ 63,758
Housing Units	2009 Total Housing Units	14,349	20,835	39,726	53,139
	Total Occupied Housing Units	11,470	15,885	32,283	40,680
	% Owner	85.3%	82.7%	58.1%	69.6%
	% Renter	14.7%	17.3%	41.9%	30.4%
Median Home Value	2000 Census-based	\$ 150,318	\$ 111,087	\$ 73,765	\$ 94,809
	2009 Estimated	\$ 252,179	\$ 199,032	\$ 160,458	\$ 160,874
	Historical Annual Growth 2000 to 2009	5.9%	6.7%	9.0%	6.1%
Homes by Year Built	1999 to March 2009	70.5%	36.4%	43.1%	30.1%
	1990 to 1998	17.2%	27.9%	12.0%	14.9%
	1980 to 1989	10.2%	26.0%	15.6%	28.1%
	1960 to 1979	1.9%	8.9%	22.3%	24.6%
	1940 to 1959	0.2%	0.7%	5.5%	2.0%
	Prior to 1939	0.03%	0.2%	1.5%	0.2%
Consumer Expenditure	Total Consumer Expenditure	\$687,091,988	\$829,548,307	\$1,387,996,302	\$ 1,786,792,205
	Apparel	8.1%	7.5%	8.1%	6.7%
	Contributions & Gifts	3.5%	3.0%	2.8%	3.3%
	Education & Day Care	6.4%	5.5%	5.3%	5.2%
	Entertainment	6.5%	5.8%	5.7%	5.3%
	Food, Beverage, & Tobacco	19.8%	21.3%	22.4%	21.6%
	Furnishings & Equipment	5.8%	5.5%	5.1%	5.3%
	Health Care & Insurance	9.8%	10.7%	10.5%	12.2%
	Household Operations & Shelter & Utilities	12.5%	12.9%	13.3%	13.4%
	Personal Care & Services	6.0%	5.9%	5.8%	6.4%
	Travel & Transportation	21.6%	21.7%	20.9%	20.7%

Source: Claritas 2010; Real Estate Research Consultants, Inc.

Evolving Trade Area by 2030

Over time, as infill commercial development and DRI housing unit buildout occurs and household composition changes (kids move out, go to college, etc), the distance in which people are willing to drive to obtain certain desired goods and services will decrease as they are able to shop closer to home. Therefore, the ten-minute drive time trade area boundary as it is currently represented will likely evolve into a three-mile radius around the subject site by 2030, which is shown in the following map.

Trade Area: ten-minute drive time (2009) morphing to three-mile radius (2010)



Source: Real Estate Research Consultants, Inc.

The three-mile radius is a standard distance utilized by the retail industry to understand demographics for site selection, determining whether an area could support certain establishments. In order to project future population and households driving future demand within the evolving subject trade area, RERC identified a mature market area (three-mile radius) within the Fort Myers MSA to serve as a surrogate for typical, local built-out conditions. By studying the development patterns and household capacity of this established area, RERC applied a similar expectation for the subject trade area over the planning period.

The same demographic metrics were collected and analyzed for both the subject trade area and the mature market area three-mile radii to examine patterns of growth, density, and development. Due to the presence of airport operations, impact zones, and sensitive lands within the subject trade area, RERC discounted the RSW radius by 50% to limit our demand analysis to only the portion of land available in the relevant trade area for future development; the same percentage was also applied to the mature radial area for a proper comparison. Using these demographic trends and those observed in the ten-minute drive time trade area, RERC developed projections for the evolving trade area from the current period through 2030, which are summarized in the following table.

RELEVANT TRADE AREA POPULATION & HOUSEHOLD PROJECTIONS*		
	2009 Existing	2030 Estimated
Population	30,289	38,500
Households	11,470	17,500
Average Persons/Household	2.65	2.2
Incremental Household Additions		6,030
* The geographic boundary of the subject trade area continually morphs from within a 10-minute drive time to a 3-mile radius of the subject site over the planning period. The composition of the trade area's households also changes as they mature, exhibiting a decrease in persons per household over the same planning period.		

Source: Real Estate Research Consultants, Inc.

Five-year near-term projections (2010 to 2015) for attribute data were used to analyze more immediate trends in order to prepare longer-term projections to 2030. Please note, the future data included here indicate general trending and are in no way predictive of actual outcomes. The Claritas population and housing projections utilized as a foundation for future projections and estimates here are a current industry standard used by developers/retailers considering trade areas for new development or expansion and therefore are included as one perspective in our analysis.

Trade Area Demand and Corresponding Need

Using its proprietary models, RERC determined overall trade area demand and corresponding need based on the population and number of households projected for the trade area by 2030. The following table summarizes total estimated supportable retail demand and corresponding need within the trade area by 2030.

RETAIL & SERVICE DEMAND & CORRESPONDING NEED SUPPORTED WITHIN THE TRADE AREA			
		2010 - 2030	
		Total SF Capture	Total Market Need* Midpoint
Retail			
Grocery Store & Convenience Goods		196,000 - 239,000	271,900
Destination Retail / Shopper Goods		632,000 - 773,000	878,100
	<i>Subtotal</i>	<i>828,000 - 1,012,000</i>	<i>1,150,000</i>
Restaurants			
Full Service Restaurants		59,000 - 72,000	81,900
Limited Service Restaurants		30,000 - 37,000	42,900
Specialty Food & Drinking Places		4,000 - 5,000	5,600
	<i>Subtotal</i>	<i>93,000 - 114,000</i>	<i>130,400</i>
Services			
		202,000 - 248,000	281,300
Total		1,123,000 - 1,374,000	1,561,700

* reflects application of 25% market factor

Source: Real Estate Research Consultants, Inc.; Census of Retail Trade; Dollars & Cents of Shopping Centers; Sales & Marketing Management; Survey of Buying Power; Claritas 2010

RERC identified a number of sites within the trade area and general vicinity of RSW that may compete with the subject site for supportable retail, restaurant, and services development during the 2010 to 2030 timeframe. The following table presents the competitive DRI or PD-level projects considered.

ACTIVE & PENDING DRI APPROVALS FOR RETAIL & SERVICES DEVELOPMENT			
RSW Vicinity			
Developments	Retail and Services Square Feet		
Existing	Approved	Built	Remaining
Alico Interchange Park	696,000	-	696,000
Arborwood	170,000	-	170,000
Gateway Community	2,955,000	420,580	2,534,420
Gulf Coast Towne Center	1,921,765	750,000	1,171,765
Jetport-Interstate Commerce Park	96,634	148,000	(51,366)
Miromar Lakes	250,000	-	250,000
Sun City, Fort Myers	345,000	-	345,000
The Forum	1,272,824	480,000	792,824
Total SF	7,707,223	1,798,580	5,908,643
Pending / In Process			Total
Florida Gulf Coast Technology & Research Park			370,000
Lee Co. Red Sox Ballpark & Spring Training Facility			325,000
Millennium Corporate Park			250,000
Premier Airport Park			28,573
Note: retail and services DRI data as supplied by Southwest Florida Regional Planning Council and available / current in February 2010			
* recent substantial deviation			
^ formerly portion of Omni Interstate Park			

Source: Annual Reports for Active DRIs & Pending DRI Applications: Southwest Florida Regional Planning Council; Real Estate Research Consultants, Inc.

To estimate the amount of trade area demand and corresponding need that could be captured on site, RERC applied capture rates based on competitive inventory and retail sites within the trade area to generate estimated incremental demand and corresponding need supportable on the subject site through 2030. The following table summarizes on-site projected demand and corresponding market need.

RETAIL & SERVICE DEMAND & CORRESPONDING NEED SUPPORTED ON-SITE		
	2010 - 2030	
	Total SF Capture	Total Market Need Midpoint*
Retail		
Grocery Store & Convenience Goods	48,000 - 60,000	68,000
Destination Retail / Shopper Goods	48,000 - 59,000	66,900
<i>Subtotal</i>	<i>96,000 - 119,000</i>	<i>134,900</i>
Restaurants		
Full Service Restaurants	11,000 - 13,000	15,000
Limited Service Restaurants	7,000 - 8,000	9,400
Specialty Food & Drinking Places	1,000 - 1,000	1,300
<i>Subtotal</i>	<i>19,000 - 22,000</i>	<i>25,700</i>
Services	67,000 - 82,000	93,150
Total Estimated Demand	182,000 - 223,000	253,750

* reflects application of 25% market factor

Source: Real Estate Research Consultants, Inc.; Census of Retail Trade; Dollars & Cents of Shopping Centers; Sales & Marketing Management, Survey of Buying Power; Claritas 2010

Approximately 1.4 to 1.7 million square feet of retail and service market need can be supported within the trade area over the 2010 to 2030 planning period. The subject site is able to capture approximately 16% of this estimated trade area allocation for community and neighborhood shopping center-level demand and corresponding need.

Due to the configuration of the trade area, the subject site competes with major retail concentrations like The Forum and Gulf Coast Towne Center for regional shopping center demand. Because both of these large-scale lifestyle centers have already achieved a critical mass of retail concentration, synergy, and location, they are very likely to continue to attract tenants and users to these areas, limiting the ability of another nearby site to develop similarly. Hence, the subject site is unable to capture any portion of regional shopping center demand. Consequently, viable development on the subject site must be necessarily geared toward meeting the convenience and everyday needs, including services, of passersby and trade area households. Further, increased supportable demand for services space means more employees on site, who will also generate some level of demand for the retail, restaurants, and other services located on the subject site.

Given RERC's market analysis and staff experience as well as comprehensive fieldwork, we believe the following retail and services concepts appear to have sufficient demand and corresponding need to support their development by 2030 at the subject site.

Retail

- Full service grocery store
- Two junior anchor discount stores
- Full service pharmacy with retail
- Neighborhood hardware supplies store
- Large format gas station/convenience store
- Miscellaneous small retail stores

Restaurants

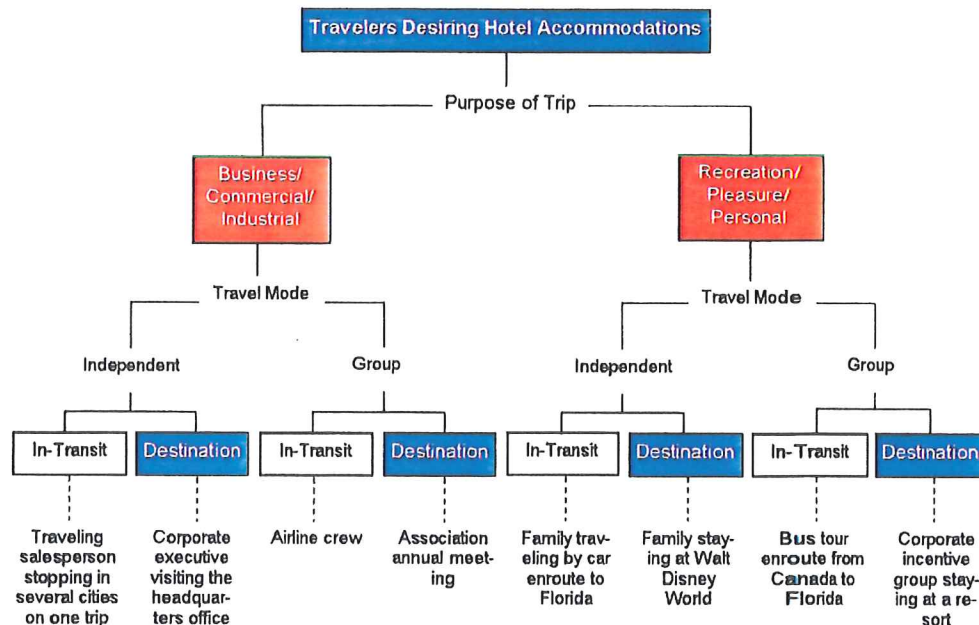
- Two full service restaurants with table service
- Two limited service restaurants with walk-up counter service
- One specialty food and drink place such as a coffeehouse or yogurt/smoothie shop

Services

- Bank
- Insurance agency
- Offices for professional services firms
- Medical services such as doctor or dentist offices, outpatient care center, urgent care
- Child daycare services
- Dry cleaner and garment services
- Multimedia rental store
- Salon

HOTEL ROOM DEMAND

The following figure illustrates typical travelers desiring hotel accommodations. As shown, travelers are divided into two basic segments – business and personal. Based on the information illustrated, the current RSW market is generally focused on primary destination travelers with a small in-transit component that includes airline crews.



Sources: Urban Land Institute, Real Estate Research Consultants, Inc.

The following table briefly profiles the characteristics of travelers for the following types of travel: commercial/individual, commercial/group (convention), and pleasure/individual.

Characteristics	Commercial/Individual	Commercial/Group (Convention)	Pleasure/Individual (Tourist)
<i>Fluctuations in Demand</i>	Monday through Thursday nights. Limited monthly fluctuations, although demand decreases somewhat during summer months and around holidays.	Either weekdays or weekends. Spring and fall months most popular for large associations.	Summer months most popular overall. Seasonality varies widely, based on geographic destination and on activities to be pursued.
<i>Number of Guests per Room</i>	One.	Two.	Two or more.
<i>Length of Stay</i>	One to four nights.	Two to four nights.	Two to six nights or longer.
<i>Preferences for Facilities/Amenities</i>	Varies based on price sensitivity: corporate executive often wants quality restaurants, bars, perhaps a health club, and is concerned with image; traveling salesperson may be more price sensitive, wants convenience, reasonably priced restaurants, and lively bars. Highly location sensitive.	Specific need for varied amounts of meeting, banquet, and exhibition space; for flexibility in space; for excellent audiovisual support; for knowledgeable and proven convention coordinators; and sometimes for recreational amenities.	Often wants swimming pool, tennis. Golf, game room, or other recreational amenities. Desire for a variety of restaurants and bars varies, based on extent of development and on alternative facilities in the surrounding area.
<i>Price Sensitivity</i>	Varies based on position and income level of the guest, and on whether or not guest is traveling on an expense account.	Little, because of discounts on rooms rates due to the volume of rooms booked, and due to the amount of food and beverage business generated.	Full spectrum—from high price sensitivity to none.
<i>Extent of Repeat Patronage</i>	Considerable amount of repeat business, because many commercial travelers must be in an area on a recurring basis. Also depends on incentives available for increasing frequency.	Frequently, rotation of one group through several geographic areas occurs, with large groups going from one property to another within a chain.	Repeat visits occur, but for each trip the tourist selects this destination, does not need to go there. Many competitive influences vie for this market: travel agents, advertising, recommendations of friends or relatives, and past experience.
<i>Source of Room Demand</i>	Influenced primarily by the specific demand generators located within the market area.	Varies from small meetings for local companies' salespeople, to large state or regional events, to national groups.	Fluctuates widely, based on the size of the resort, the facilities and attractions available, marketing efforts, and reputation.

Sources: Urban Land Institute, Real Estate Research Consultants, Inc.

As outlined here, there is a variety of consumer preferences for hotel stays. Hotel developers have recognized the wide array of demand and have attempted to match amenities to consumer's preferences. Hotel product generally falls into one of four major types – resort

hotels, all-suite concept hotels, meeting/conference hotels, and tourist-class hotels. Each is different in the product it offers and the rates charged to the consumer.

For our analyses, hotel product in the RSW submarket has been defined by actual or estimated average room rate. The five price categories include:

- Luxury – top 15% average room rates
- Upscale – next 15% average room rates
- Midscale – middle 30% average room rates
- Economy – next 20% average room rates
- Budget – lowest 20% average room rates

Our analyses focus specifically on the performance and market supportability of product in the midscale and upscale segments within the RSW hotel submarket. This represents the middle of the market and the product types having the greatest feasibility based on site requirements, construction costs and anticipated operating income. The cost-benefit of developing a luxury category is likely not feasible given high construction costs and larger acreage requirements and therefore was not included in the analysis.

RSW Hotel Submarket and Trade Area

Although the MSA has nearly 11,000 hotel rooms, relatively few are within a three-mile drive of the airport. The hotel properties proximate the airport are classified as midscale (with or without food and beverage service) or upscale properties. For our analysis, RERC began by evaluating 27 properties that have a combined 3,280 rooms representing almost 30% of the total MSA hotel room inventory. These properties are presented in the following table along with their respective number of rooms, opening date, and chain scale.

HOTEL PROPERTIES BY YEAR BUILT			
RSW Hotel Submarket			
Property	Rooms	Opening Date	Chain Scale
Clarion Fort Myers	192	Jun-69	Mid w/ F&B
Ramada Limited Fort Myers	130	Jun-81	Mid w/o F&B
La Quinta Inn Fort Myers Central	129	May-84	Mid w/o F&B
Comfort Inn Fort Myers	80	Feb-86	Mid w/o F&B
Crowne Plaza Fort Myers @ Bell Tower Shops	227	Dec-87	Upscale
Best Western Fort Myers Inn & Suites	104	Feb-90	Mid w/ F&B
Hampton Inn Fort Myers Airport I-75	87	Sep-94	Mid w/o F&B
Residence Inn Fort Myers	78	Feb-96	Upscale
Homewood Suites Fort Myers	130	Sep-97	Upscale
Best Western Airport Inn	106	Jan-98	Mid w/ F&B
Fairfield Inn Fort Myers	104	Oct-98	Mid w/o F&B
Hilton Garden Inn Fort Myers	126	Sep-01	Upscale
Springhill Suites Fort Myers Airport	106	Mar-06	Upscale
Embassy Suites Fort Myers Estero	150	Jun-06	Upper Upscale
Hampton Inn Suites Fort Myers Estero	94	Jan-07	Mid w/o F&B
Hampton Inn Suites Fort Myers Colonial Boulevard	102	May-07	Mid w/o F&B
Comfort Inn & Suites Fort Myers	90	Jul-07	Mid w/o F&B
Courtyard Fort Myers @ I-75 & Gulf Coast	134	Nov-07	Upscale
Candlewood Suites Fort Myers I-75	80	Mar-08	Mid w/o F&B
Holiday Inn Fort Myers Airport Town Center	169	Feb-09	Mid w/ F&B

Hyatt Place Coconut Point	108	Feb-09	Upscale
AmericInn Fort Myers	110	Mar-09	Mid w/o F&B
Homewood Suites Fort Myers Airport	133	Apr-09	Upscale
Holiday Inn Express & Suites Fort Myers W The Forum	111	Apr-09	Mid w/o F&B
Hilton Garden Inn Fort Myers Airport FGCU	164	Oct-09	Upscale
Hyatt Place Fort Myers @ The Forum	149	Oct-09	Upscale
Country Inn & Suites Fort Myers North	87	U/C	Mid w/o F&B

Source: Real Estate Research Consultants, Inc.

The average number of rooms at the midscale and upscale properties profiled was approximately 120. Amenities and services common to these properties include but are not limited to:

Property Amenities: Complimentary continental breakfast, outdoor pool, exercise facility, airport shuttle, business center, meeting facilities and conference services.

Room Amenities: Wireless internet service, high-speed internet service, cable television, microwave, refrigerator, room service and premium bedding.



To further analyze supportable demand and corresponding market need relative to the subject property, RERC identified eight of the 27 chain-affiliated midscale or upscale hotel properties evaluated in the submarket as relevant trade area hotels that appear to be most comparable to any anticipated future product that might be developed. These eight properties are presented in the following table and serve as the basis for the operating data discussed in this section. The data reflect research for the period from November 2007 through December 2009 conducted by Real Estate Research Consultants in consultation with published and provided data from public agencies, property owners and third parties.

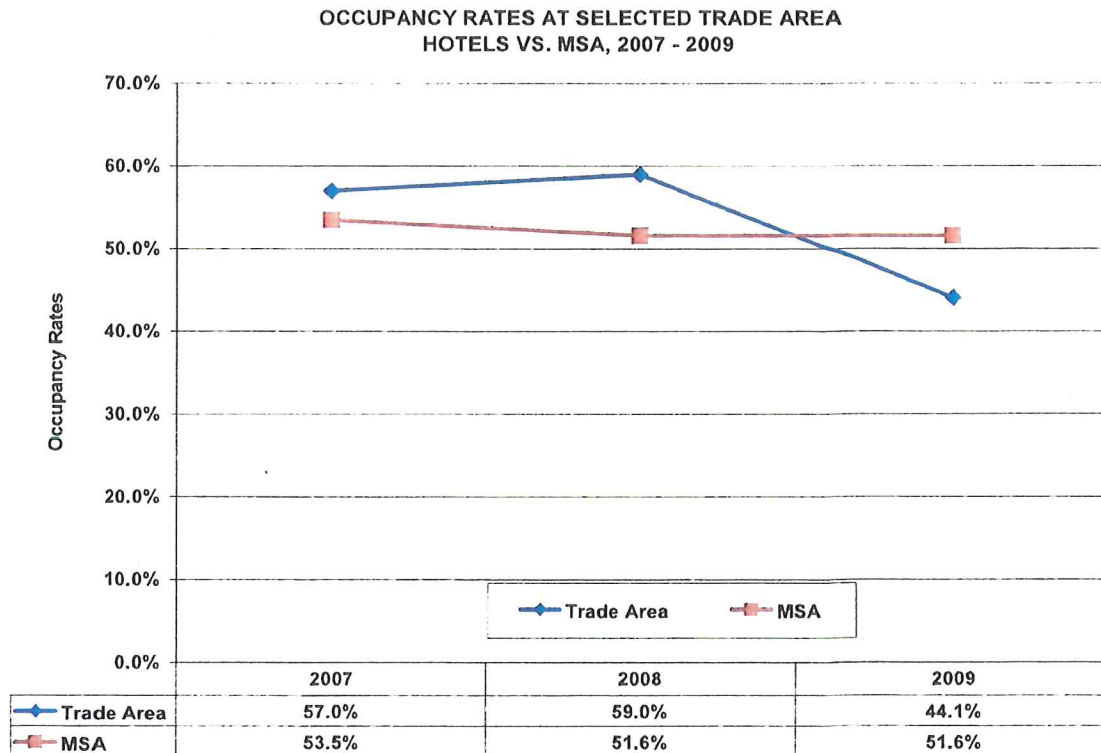
HOTEL PROPERTIES		
RSW Hotel Trade Area		
Property	Opening Date	Rooms
Holiday Inn Express & Suites Fort Myers W The Forum	Apr 2009	111
Springhill Suites Fort Myers Airport	Mar 2006	106
Holiday Inn Fort Myers Airport Town Center	Feb 2009	169
Homewood Suites Fort Myers Airport	Apr 2009	133
Hilton Garden Inn Fort Myers Airport FGCU	Oct 2009	164
Comfort Inn & Suites Fort Myers	Jul 2007	90
Courtyard Fort Myers @ I-75 & Gulf Coast	Nov 2007	134
Hampton Inn Suites Fort Myers Estero	Jan 2007	94

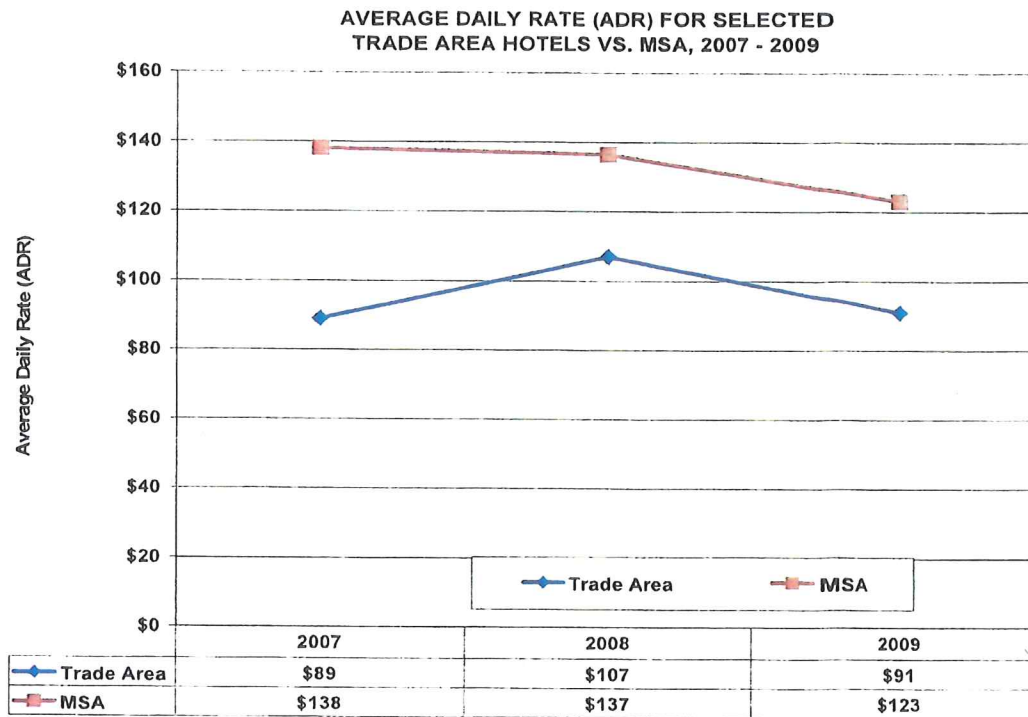
Source: Real Estate Research Consultants, Inc.

The following highlights performance characteristics of the eight properties which have a combined 1,001 rooms:

- Between 2008 and 2009, occupancy rates at these properties slipped relative to the MSA's overall occupancy rates; 2009 average occupancy in the trade area was about 44%.
- Average daily rates for the properties have consistently lagged ADRs for the MSA by \$30 to \$50. 2009 average daily rates in the trade area were just above \$90.
- Revenue Per Available Room (RevPAR), defined as room revenue divided by the number of rooms available, for the selected properties averaged approximately \$48 over the past three years. A close approximation for RevPAR can be made by multiplying occupancy by ADR.

The following illustrate trends in occupancy and ADR for the selected trade area properties versus the same metrics for the MSA.





Source: RERC Research and Lee Co. CVB

Planned, Proposed or Under Construction Lodging

There are currently no new hotels under construction within the trade area for the subject property and none appear to be in the development pipeline in the short term. Within the RSW vicinity, there are several Developments of Regional Impact (DRI) that have approximately 2,100 unbuilt hotel rooms approved for development.

ACTIVE & PENDING DRI APPROVALS FOR HOTEL DEVELOPMENT			
RSW Vicinity			
Developments	Hotel Rooms		
Existing	Approved	Built	Remaining
Alico Interchange Park	400	-	400
Arborwood	-	-	-
Gateway Community	50	-	50
Gulf Coast Towne Center	250	134	116
Jetport-Interstate Commerce Park	600	77	523
Miromar Lakes	450	-	450
Sun City, Fort Myers	300	-	300
The Forum	552	260	292
Total Rooms	2,602	471	2,131
Pending / In Process			Total
Florida Gulf Coast Technology & Research Park			240
Lee Co. Red Sox Ballpark & Spring Training Facility			150
Millennium Corporate Park			275
Premier Airport Park			-
Note: hotel DRI data as supplied by Southwest Florida Regional Planning Council and available/current in February 2010			
* recent substantial deviation			
^ formerly portion of Omni Interstate Park			

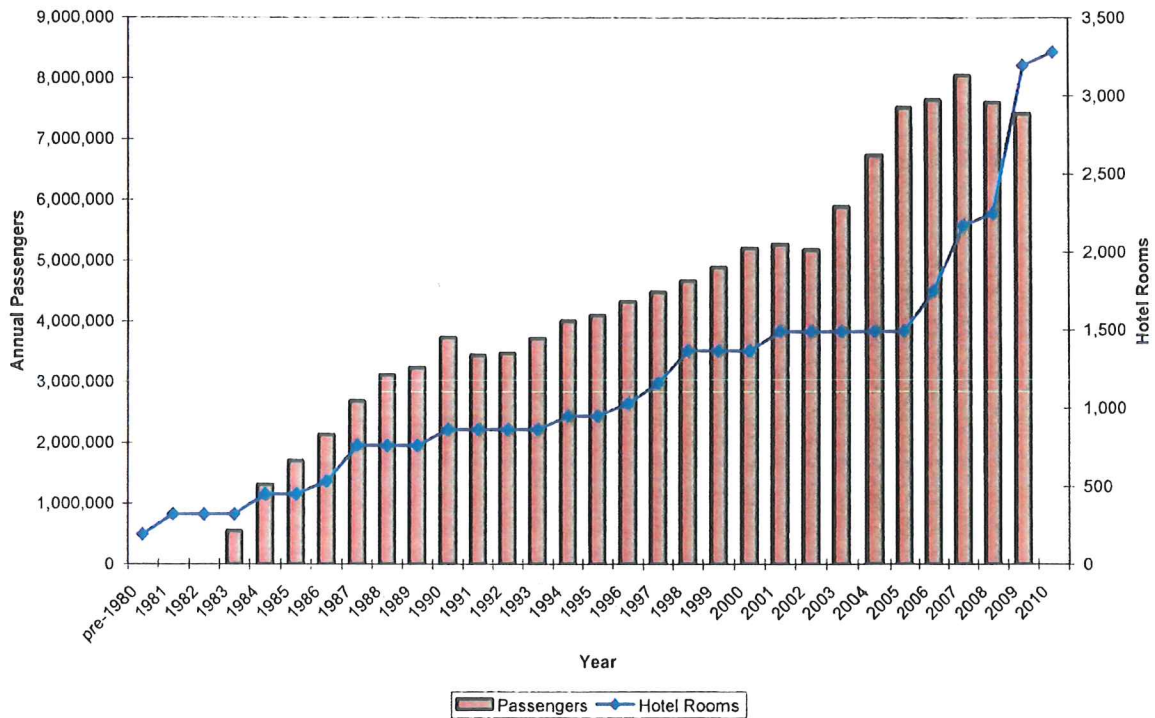
Source: Annual Reports for Active DRIs & Pending DRI Applications: Southwest Florida Regional Planning Council; Real Estate Research Consultants, Inc.

Potential Market Demand

While short-term national and local trends include lower occupancy rates and ADRs for hotels, the existing inventory in the MSA likely underserves what is anticipated in mid- to long-term demand. Going forward, domestic and international visitation to the MSA is forecast to increase and factors such as a growing university presence, Red Sox stadium complex, and regional shift in jobs and household formation to the trade area could accelerate demand for lodging at the subject property. These pending developments will enhance an evolving airport district with increased levels of business and leisure travelers generating lodging demand that could outpace trade area supply in the mid- and long-terms.

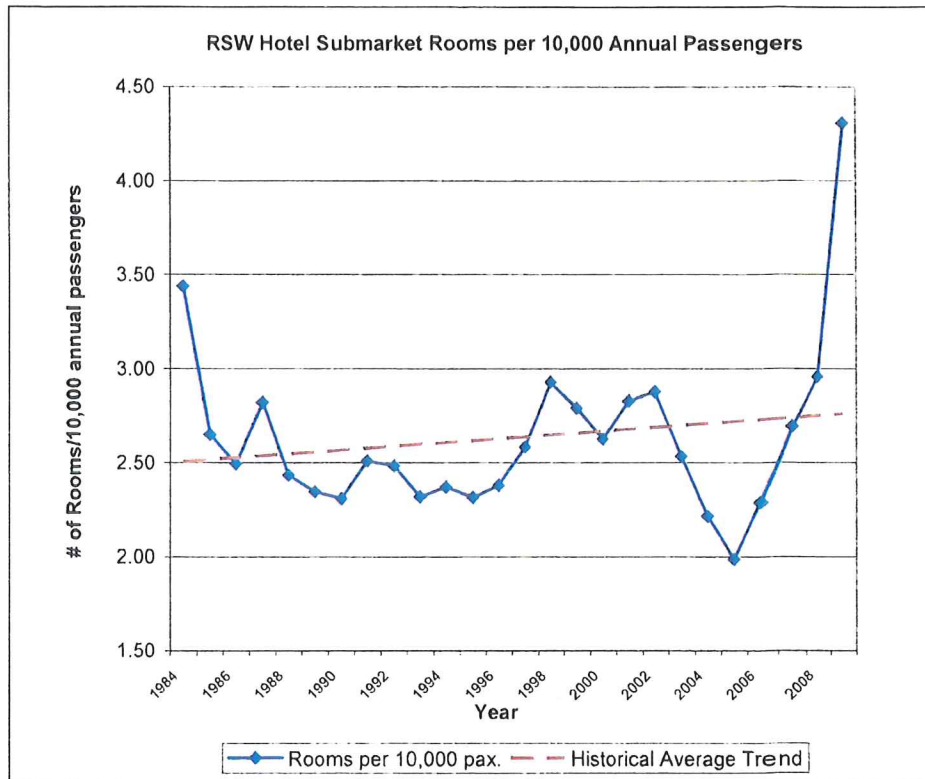
To estimate supportable hotel room demand, RERC analyzed the historical relationship between annual RSW passenger traffic levels and room supply in the submarket. The following presents the submarket's midscale and upscale room inventory from pre-1980 to 2010 and the airport's annual passenger levels beginning in 1983. Of note, additions to room supply in the submarket have been generally consistent with RSW passenger growth with the exception of the 2001 to 2005 period which is likely attributed to post-September 11th market contraction. This pattern of hotel development corresponding with airport passenger growth has been consistently observed by RERC through our work for other international airports in primary destination markets within Florida.

RSW Airport Passengers vs. Submarket Hotel Rooms



Source: LCPA and Real Estate Research Consultants, Inc.

Over the 1984 through 2009 timeframe, the historical average trend was 2.76 rooms per 10,000 airport passengers. The following chart presents the rooms per passenger metric for the indicated time period; of note, a significant number of hotel rooms were delivered to the submarket in 2009 thereby skewing the relationship metric significantly higher when compared to historical data.



The following table presents RERC's hotel demand projections for the subject property's submarket. After analyzing the historical relationship between rooms and passengers, a ratio for rooms per 10,000 annual passengers was assumed in order to forecast future midscale/upscale room demand within the submarket for the 2030 planning horizon. Projections from the Aviation Forecast for Southwest Florida International Airport Final Report (August 22, 2008 revision) that estimate passenger traffic growth using a 4.4% average annual growth rate were employed to estimate annual passenger levels for 2030. By subtracting out the existing hotel room inventory, we identified the net incremental submarket demand for the 2010 to 2030 time period.

RELEVANT SUBMARKET HOTEL DEMAND PROJECTIONS, 2010-2030		
	Existing 2009	2030 Estimated
Annual RSW Passengers*	7,415,958	17,500,000
Rooms per 10,000 passengers (Historical Avg./Projected)	2.76	3.00
Cumulative Midscale/Upscale Hotel Rooms	3,193	5,250
Estimated Incremental Room Demand by period		2,057
* Approximates annual passenger level using GRA Mid-range Forecast Growth Rates (draft TAF 2008 figures are base year) of 4.4% average annual growth.		

Source: Lee County Port Authority, Real Estate Research Consultants, Inc.

RERC's fieldwork and hotel property management interviews revealed the subject property's hotel submarket is heavily saturated at current inventory levels, producing weak occupancy and declining average room rates in the local market. That said, for the mid- to long-terms, we

considered the competitive positioning of existing hotel entitlements in DRIs within the vicinity of RSW to determine what potential fair share of the net incremental room demand in the submarket might be allocated to the subject property. Given industry standards and recommended minimum thresholds of room counts for successful midscale/upscale product, we have identified the following number of supportable hotel rooms on site for the 2030 planning horizon.

HOTEL DEMAND & CORRESPONDING NEED ALLOCATION		
Submarket and Subject Site		
Area	2010-2030	
	Market Demand	Total Market Need*
Submarket (rooms)	2,057	2,571
On-site (rooms)	150	187
* reflects application of 25% market factor		

Source: Real Estate Research Consultants, Inc.

Based on our research of the metro area and the subject property's submarket, and the analyses presented here, we anticipate sufficient market need for approximately 187 additional lodging units at the subject site by 2030. This new room inventory is likely accommodated best in a midscale or upscale hotel property with a national hotel flag (chain) affiliation. To be competitive in the submarket, the property should include amenities and services comparable to those previously outlined.