

ZONING DIVISION  
LEE COUNTY  
PLANNED DEVELOPMENT SUFFICIENCY REVIEW  
TRANSMITTAL SHEET

TO: Distribution

FROM: Mikki J Rozdolski

DATE: 06/26/2014

John Fredyma, Asst County Attorney  
DS Reviewer - Tom Sawtell  
  
Rob Price, TIS Reviewer  
Paul O'Connor, Planning  
Susie Derheimer, Environmental Sciences  
Lili Wu, LCDOT  
Dawn Huff, Lee County School District  
Sam Lee, Natural Resources  
Chick Jakacki, Zoning  
Mike Pavese, Public Works  
Pam Houck, Zoning Director

**\* REVIEWERS - remember permit plan checklists should now be used.**

PROJECT NAME: BERMUDA LAKES RV RESORT RVPD

CASE #: DCI2014-00010

INFORMATION SUMMARY:

**RESUBMITTAL**

To update your file  
☒ Review and forward sufficiency  
questions or make finding of  
sufficiency

**RESPONSE REQUIRED BY: 07/10/2014**

Additional Comments:

(DCI) Lee County LDC Section 34-373(d)(1).  
Sufficiency and Completeness

No hearing will be scheduled for an application for a Planned Development until the application has been found sufficient. All applications for Planned Developments will be deemed sufficient unless a letter advising the applicant of any insufficiencies has been mailed within fifteen (15) working days of submittal of the application. All amended applications will be deemed sufficient unless a subsequent letter advising the applicant of any insufficiencies has been mailed within fifteen (15) working days of the date of the resubmittal. The contents of insufficiency letters will be limited to brief explanations of the manner in which insufficient applications do not comply with the formal requirements in Section 34-373.

cc: DCI planner/working file  
DCI Zone File

Distributed by: Jamie Princing

Date: 06/27/2014



**STUART AND ASSOCIATES**  
Planning and Design Services

7910 Summerlin Lakes Drive  
Fort Myers, FL 33907

C 239-677-6126  
[Greg@Stuarturbandesign.com](mailto:Greg@Stuarturbandesign.com)

[www.Stuarturbandesign.com](http://www.Stuarturbandesign.com)

June 24, 2014

To: Mikki Rozdolski, Senior Planner

From: Greg Stuart

Re: The 06/24/14 Revised Sufficiency Response Submittals

CC: Alan Erp, Sam Marshall, PE

Dear Mikki:

From a review of our recently resubmitted application and information, I noted a mistake that I made. To that end, for your review, please assess the revised Ex. 19 Deviation Schedule, Ex. 15 Development Standards, and revised Master Concept Plan. These three items include the revised minimum RV site size standard and minimum width. The request and explanation is identified as the new Deviation Ten.

Thank you for your consideration and I look forward to seeing you in two weeks.

Sincerely,

Greg Stuart

GS/project/13.009/24junestuart\_coverletter\_revisionstaff.pgs.

**RECEIVED**

JUN 26 2014

**COMMUNITY DEVELOPMENT**  
**DCI2014-00010**



**STUART AND ASSOCIATES**  
Planning and Design Services

7919 Summerlin Lakes Drive  
Fort Myers, FL 33907

C 239-677-6126  
[Greg@Stuarturbandesign.com](mailto:Greg@Stuarturbandesign.com)

[www.Stuarturbandesign.com](http://www.Stuarturbandesign.com)

## Ex. 15 - Request Statement - Development Standards

Revised 06/24/14

### Bermuda Lakes RVPD Development Standards

#### Recreational Vehicle Units:

- Lot Area Min. - NA
- Lot Width Min. - 30-ft.
- Lot Depth Min. - 50-ft.
- Internal Street Setbacks - 10-ft.
- Between RV Min. - 10-ft. (5-ft. & 5-ft.)
- From Park Perimeter Boundary Min. - 40-ft.
- Internal Walls and Appurtenance Setback Min. - 10-ft.
- Water Body Min. - 25-ft.
- Side Yard Min. - 10-ft.
- Rear Yard Min. - 10-ft.
- Max Lot Coverage - None
- Tie-downs - LDC 34-762(2)
- RV Storage - LDC 34-762(4)

#### Group Club House:

- Lot Area Min. - No minimum lot area or dimensions required, provided that the area is of sufficient size to accommodate the proposed use as well as all setbacks, parking, drainage, landscaping and other applicable County code requirements.
- Street Setbacks - 25-ft.
- Side Yard Setbacks - 15-ft.
- Rear Yard/Rear Yard Water Body - 25-ft.
- Max. Height - 35-ft.
- Max. Lot Coverage - 50%

**RECEIVED**

JUN 26 2014

COMMUNITY DEVELOPMENT

DCI 2014-00010

Maintenance Building and Operations/Open Storage Area:

Lot Area Min. – No minimum lot area or dimensions required, provided that the area is of sufficient size to accommodate the proposed use as well as all setbacks, parking, drainage, landscaping and other applicable County code requirements.

Street Setbacks – 20-ft.

Side Yard Setbacks – 10-ft.

Rear Yard/Rear Yard Water Body – 10-ft.

Max. Height – 35-ft.

Max. Lot Coverage – None

Other – LDC 34-762(4)

RECEIVED

JUN 26 2014

COMMUNITY DEVELOPMENT

DCI 2014-00010

## Exhibit 19 Bermuda Lakes RVPD Deviation Schedule

*Revised 06/26/14 (Dev. 10)*

1 Deviation One LDC Property Development Regulations Table 34-792 Note 8, and 34-939(b)(3), that RV parks shall provide an open space perimeter buffer area completely around the boundary, with exceptions, shall provide a vegetative visual screen within a minimum height of eight feet within the 40-foot buffer, and that prohibits roads within the 40-ft. buffer open space area; to have the option to permit a 20-ft. landscape buffer with 8-ft., solid screening wall throughout the project and a 20-ft. roadway perimeter setback, with the exception of the following two areas:

- The south site boundary line that adjoins the 3.19 acre +/- South Wetland and Buffer area (see MCP).
- The east site boundary line that adjoins the North Trail RV Center property.

The 8-ft. buffer wall's outside face (towards the adjoining neighboring properties) will have a minimum single native landscape hedge, along with grasses, ground covers and 5 trees per 100 LF; 75% of new trees will be native. Code required trees must be #1 or better in quality, be a min. 10-ft. in height with 2-inch caliper at the time of installation; palms must have a min. 10-ft. of clear trunk at planting. Code required shrubs must be #1 or better in quality, a minimum height of 2-ft. at planting, a minimum 3-ft. from 1 year after planting, and maintained a minimum 3-ft.

The basis of the request is that the proposed 20-ft./8-ft. wall standard is functionally superior to the the 40-ft. vegetation standard. Solid walls are superior when compared to vegetative screening for visual buffering, sound attenuation, and general security and privacy concerns. The project will benefit from reduced light, noise and sound impacts and phenomena originating from the Orange River Elementary School. The north and northwest residential neighborhoods will be better served by a screening wall in a 20-ft. buffer area. The requested standard is greater than a B Buffer, (Recreation to SF 15-ft. buffer). Not only do solid walls perform better in nuisance prevention, but they eliminate the initial ineffectiveness of vegetative barriers brought about due to the time needed for plantings to growth and development. The project will also benefit by obtaining a slightly greater use of the land. Given the specific site location and configuration, exemplified by the limited number of single family home sites adjoining the northwest and north border areas, a 20-ft. buffer and wall will provide above code buffering.

The deviation request to selectively eliminate buffer requirements for the project's east boundary that adjoins the North Trail RV Center's native open space tract. The adjoining North Trail RV Center property ownership is identical to the Bermuda

DCI 2014-00010

**RECEIVED**  
JUN 26 2014

COMMUNITY DEVELOPMENT

Lakes RVPD ownership. Based on the functional relationship between the two uses, combined with common ownership interests, the deviation is warranted. The project will benefit by obtaining a slightly greater use of the land and avoiding unnecessary buffering costs. The deviation request excludes the south boundary areas of the RVPD associated with the 3.19 acre wetland and buffer. Adjoining properties are very well buffered by these natural systems.

2. Deviation Two LDC 34-939(c) Accessory Structures and Additions, that individual accessory structures, additions or freestanding storage sheds shall be permitted only in non-transient parks, and only when in compliance with the regulations set forth in sections 34-784 through 34-790; to permit freestanding storage sheds and accessory structures within the designated Maintenance, Operations and Open Storage area.

The deviation is to permit accessory structures and/or freestanding storage sheds within the designated Maintenance, Operations Area and Open Storage Area. These structures are needed for proper RV resort operations, are internal to the project, and will be buffered around the site perimeter. The deviation will not cause a deleterious affect on the one adjoining property and the 40-ft. drainage easement.

3. Deviation Three LDC 10-418(2)(a, b, c, d) Planted Littoral Shelf, that requires 25% of total lake shoreline to include planted littoral shelves with concentrated planting schemes and 20-ft shelves, to permit a non-specified percentage based upon professionally accepted civil engineering practices.

With the exception of the east lake bulkhead, the deviation rests on no existing lake slope grading, regrading and/or lake shoreline earthwork activities. Thus there will be no external impacts based on current conditions. The existing lake will not fundamentally change; the deviation will grant the Applicant significant landscape development cost savings. Areas identified for potential lake erosion will incorporate planting schemes as determined by the civil engineer and landscape architect.

4. Deviation Four LDC 10-418(1). Shoreline Configuration, that requires a surface water management lake to have a sinuous shoreline; to not require the existing lake to have a sinuous shoreline.

As with Deviation Three, with the exception of the east lake bulkhead, the deviation rests on no existing lake slope grading, regrading and/or lake shoreline earthwork activities. Recognizing the fact that the existing lake will be used for surface water management in a manner that does not require any reconfiguration, it is unnecessary and unwarranted to force the applicant to reconfigure the existing lake. The rule's focus is on new drainage lakes, not existing lakes. Hence, the deviation will grant the Applicant significant land development cost savings. The

DCI 2014-00010

RECEIVED  
JUN 26 2014  
COMMUNITY DEVELOPMENT

existing lake will fundamentally not change. Thus there will be no external impacts based on current conditions.

5. Deviation Five LDC 34-939(4) and LDC 10-296 Table Two RVPD Street Widths, and Illustration 10-710, that requires a minimum local street 50-ft. ROW and 20-ft. Paved Section; to allow for One-way Streets with a minimum 16-ft. wide Paved Section within a minimum 36-ft. ROW inclusive of one sidewalk.

One-way streets are a typical RV resort circulation design feature. Referring to the MCP, the project features two internal road loops that are one-way. These two loops will generally act like private commercial access ways, with RV sites adjoining the street(s). The deviation is needed in that the LDC does not include one-way road standards. A 16-ft. paved section, with accompanying 2-ft. valley curb, will provide for a total 20-ft. street width. This new standard is wide enough to allow for adequate RV site access and emergency access. The project will benefit from the deviation by incorporating a more function and cost effective internal circulation pattern. This internal road standard will not lead to external impacts.

6. Deviation Six LDC 10-258 Emergency Shelters, that requires recreational vehicle developments to provide for the construction of a shelter based on # units by 2.4 times 20 square feet; to not provide for the construction of an on-site emergency shelter.

The requirement to provide for a 9,600 SF emergency shelter is not warranted. The project is a commercial transient RV resort. Located outside of the 100-yr. flood zone and the Coastal High Hazard Zone, the transient RV park will not be subject to storm surge. For heavy weather, hurricane events, one can logically expect that park users will leave prior to a storm hitting. It is not feasible to expect the Applicant to allow local residents to use their facilities. The deviation will grant the Applicant significant vertical development cost savings. The developer will initiate an educational program in conjunction with Lee Co. Emergency Management pertaining to hurricane awareness and the like. The developer will formulate an emergency evacuation plan for the project, which will be subject to review and approval by Lee Co. Emergency Management.

7. Deviation Seven LDC 10 Figure 11-2 Minimum Turning Path For SU Vehicles, that requires a 42-ft. project entrance roads turning radius; to require only the south Lexington Ave. entrance road to be designed with a 42-ft. turning radius.

Referring to the MCP, the project features two Lexington Ave. entrance roads, with the south road being the primary access. The deviation is needed in that the a north road access design that features the 42-ft. radius impairs the north area's RV sites. It is noted that the project will be adequately served by having the main south entrance designed to include a 42-ft. turning radius. The project will benefit from the deviation by incorporating a more function and cost effective internal

DCI 2014-00010

RECEIVED  
JUN 26 2014

COMMUNITY DEVELOPMENT

circulation pattern. This internal road design standard deviation will not lead to any external impacts.

8. Deviation Eight LDC 34-1264(b)(1)(a), that requires an on-site COP use to be located 500-ft. from a public school; to permit a 400-ft. COP use setback from the project's north property line.

Referring to the MCP the Orange River Elementary School adjoins the projects northeast border. The decrease of 100-ft., from 500-ft. to 400-ft. is warranted. The Applicant has included the COP and Food and Beverage Service to grant the project these uses by right for the project's private clubhouse. At this stage the Applicant is not sure of the type and scale of food service uses within the clubhouse but it is determined that the clubhouse COP will solely be for the benefit of the users of the RVPD. No commercial restaurants are requested for the project. Hence any COP will be based on an SRX Permit, which requires consumption on premise only in connection with a restaurant. This will reflect that the character and function of the clubhouse, similar, if not identical, to residential country clubhouses. The planned 8-ft. solid wall and landscaping across the project's north boundary will provide for more than adequate screening and protection. The wall will guarantee no external impacts to the school. The project will benefit from the Deviation by providing a typical use that will support the project's envisioned Food and Beverage Services in a manner that grants clubhouse building design and placement flexibility.

9. Deviation Nine LDC 10-416(d)(6), that requires a 25-ft. buffer with an 8-ft. wall and landscaping for roads located within 125-ft. of a SF neighborhood, to permit a 20-ft. landscape buffer and 8-ft. screening wall, with Deviation One Landscape Standards.

The Deviation pertains to the west portion of the loop road located within the northwest portion of the site. Approximately three SF homesite adjoin the project consistent with the 125-ft. standard. There is expected to be no RV lighting and noise impact to the limited number (3) adjoining homesites. First, this is do to the primarily north south orientation of the subject 1-way RV loop road within the context of the three homesites. Second, the buffer and wall will serve to prevent deleterious impacts to the three homesites. The project will benefit by obtaining a greater use of the land and a tighter integration of buffer and landscaping to the internal circulation plan.

10. Deviation Ten LDC 34-939(b)(6)(a), that requires transient RV parks to have a minimum RV lot size of 5,000 SF; to not have an RV lot minimum size standard.

The subject LDC standard is classified within 34-939(b)(6) Maximum Density, in the Design Criteria subsection. The intent of the minimum RV Lot Size Land Development Code standard is to regulate density and to assist in the calculation and evaluation of density. In this case, the Applicant is limiting project density to 5 RV sites per acre. The project density is 62.5% of the 8 sites per acre maximum density. Project density is further limited by the fact that the project's true, function

DCI 2014-00010

RECEIVED  
JUN 26 2014  
COMMUNITY DEVELOPMENT

open space is significant. This is brought about by a number of factors, including the existing lake and the three onsite wetland systems. When taking into account the total lake area (10.2 acres), the Indoor and Outdoor Recreation Area (2.3 acres) and Dry Detention Drainage Area (1 acre), combined with 8.36 acres of native open space, 2.79 acres of site perimeter buffering and 1.16 acres of lake buffer, the project incorporates a true 25.81 acres of open space. This figure is equal to 53% of the total site area. Consequently relying on the project's low density and the site's 53% true open space, the need for an additional regulatory density cap vis-a-vis a minimal RV Site Size standard is not needed. As discussed within the June 18 Sufficiency Response, Items 11b1 & c, at this point in the process the Applicant does not know how wide and how large the RV sites will be (see below for revised 11b1 response). The Applicant will rely on his own considerable expertise in the final design and sizing of the project's RV sites. The project's other setback development standards are more than adequate in providing for a function and safe site development design. Finally, it is noted that the the RV industry really does not have a "typical" lot size or a "standard" area minimum. The 5,000 SF standard is an average that is not reflected in what is typically being built in the market. For example, the Crystal Lake RV Resort in Naples has a typical 40-ft. X 80-ft. lot (3,200 SF). The Silver Lakes RV Resort in Naples has both 45-ft.X90-ft. (4,050 SF) and a 35-ft.X70-ft. (2,450 SF) standards size sites. The East Lee County River Bend RV Resort has a 50-ft.X100-ft. (5,000 SF) standard site size. However, each site is sized to feature a 10-ft.X14-ft. or a 10-ft.X16-ft. on-site Coach Home. So the site size is inherently large. The project will benefit from not having a minimum site size by granting it greater flexibility to address site size market demands. This flexibility is needed due to the project's large open space areas and low density. Finally, there will be no deleterious effects upon adjoining and adjacent properties in that the standard is interior to the project. See the following pages for the three cited RV Resort Site Plans.

Items 11(b)1&c

Please refer to the revised RVPD Master Concept Plan. The MCP illustrates typical RV lots, both "Pull-in" and "Pull-thru". At this point in the process the Applicant does not know whether the internal RV pad width will be 40-ft. 50-ft., 70-ft. or 80-ft. wide. The proposed Development Standards specifies a minimum 35-ft. wide RV pad lot width. A complete copy of the project's requested Development Standards is attached to this correspondence and labeled Exhibit 15 Request Statement Development Standards.

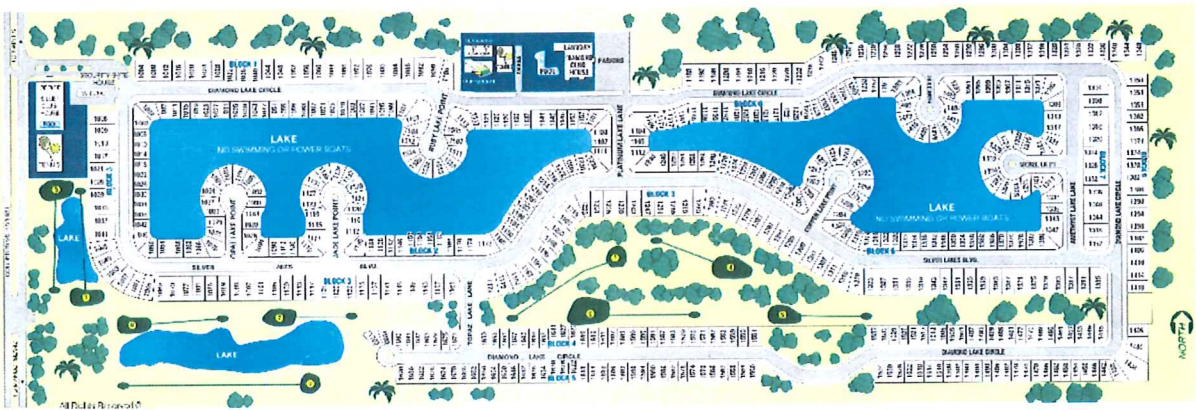
RECEIVED  
JUN 26 2014

COMMUNITY DEVELOPMENT

DCI 2014-00010



Crystal Lakes RV Resort, Naples, FL



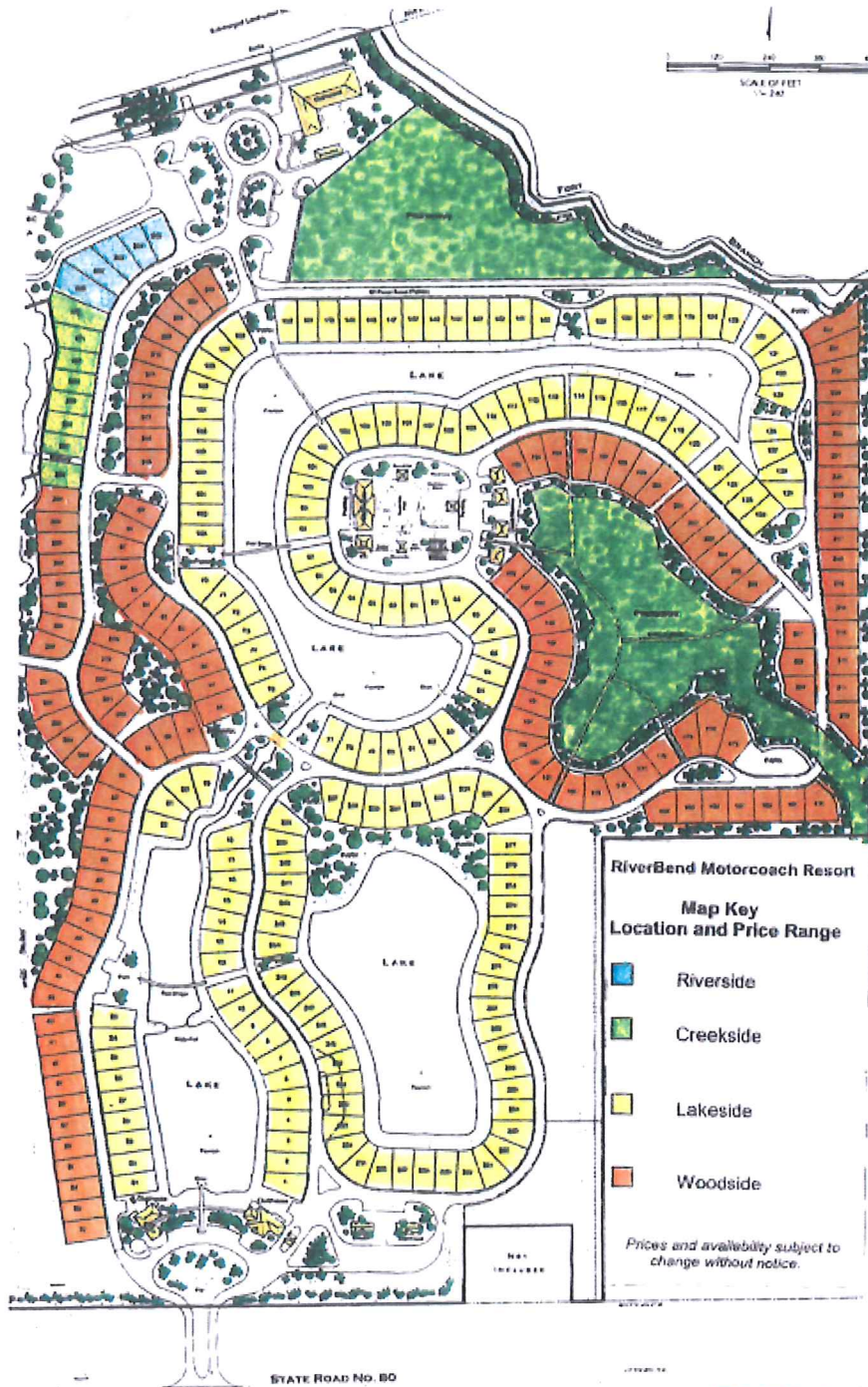
Silver Lakes RV Resort, Naples, FL

RECEIVED

JUN 26 2014

COMMUNITY DEVELOPMENT

DCI 2014-00010



River Bend RV Resort, East Lee County, FL

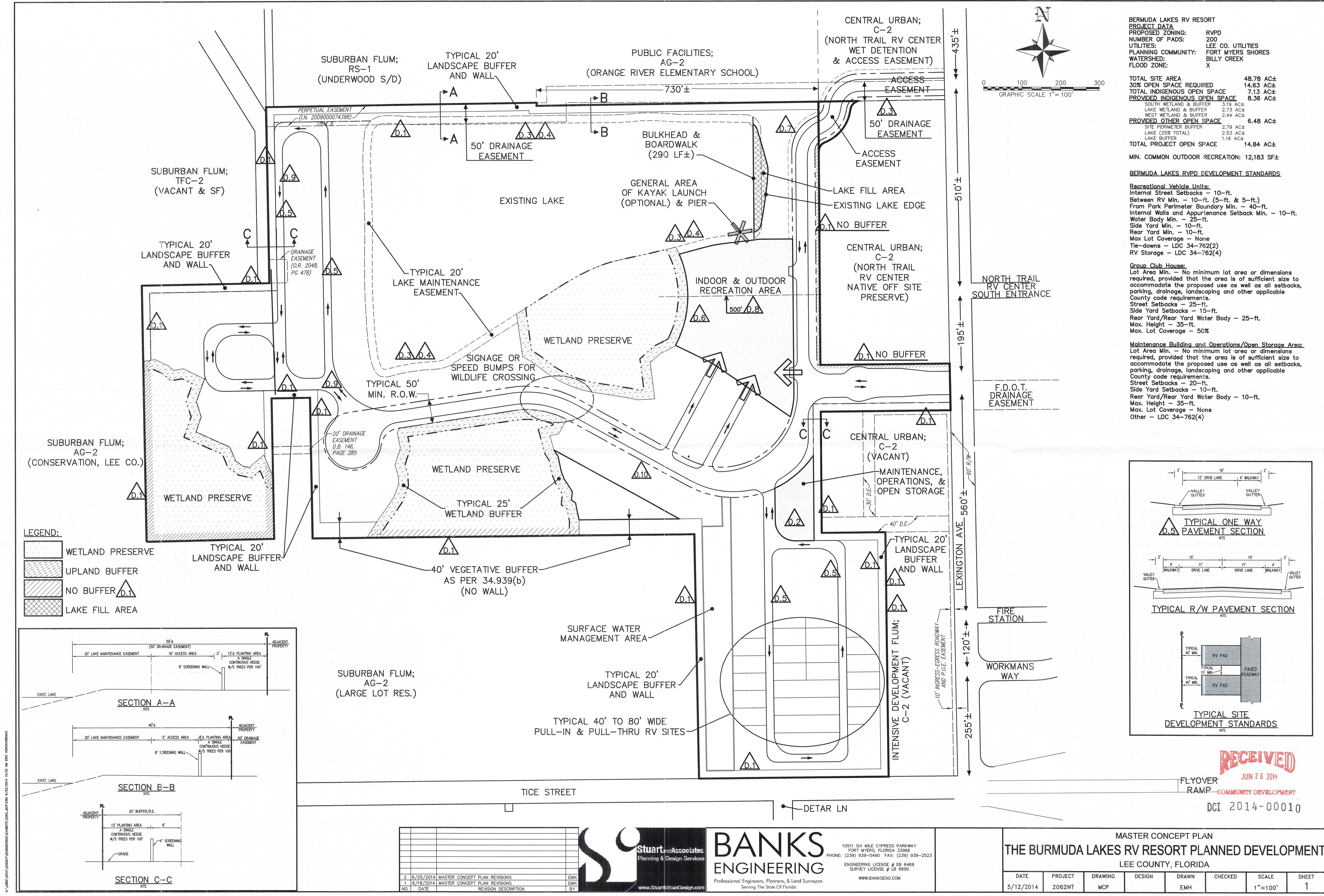
**RECEIVED**

JUN 26 2014

COMMUNITY DEVELOPMENT

DCI 2014-00010





**BERMUDA LAKES RV RESORT**  
PROJECT DATA  
PROPOSED ZONING: RVPD  
NUMBER OF PADS: 200  
UTILITIES: LEE CO. UTILITIES  
PLANNING COMMUNITY: FORT MYERS SHORES  
WATERSHED: BILLY CREEK  
FLOOD ZONE: X

TOTAL SITE AREA 48.78 AC±  
30% OPEN SPACE REQUIRED 14.63 AC±  
TOTAL INDIGENOUS OPEN SPACE 7.13 AC±  
PROVIDED INDIGENOUS OPEN SPACE 8.36 AC±

SOUTH WETLAND & BUFFER 3.19 AC±  
LAKE WETLAND & BUFFER 2.73 AC±  
WEST WETLAND & BUFFER 2.44 AC±

PROVIDED OTHER OPEN SPACE 6.48 AC±  
SITE PERIMETER BUFFER 2.79 AC±  
LAKE (25% TOTAL) 2.53 AC±  
LAKE BUFFER 1.16 AC±

TOTAL PROJECT OPEN SPACE 14.84 AC±

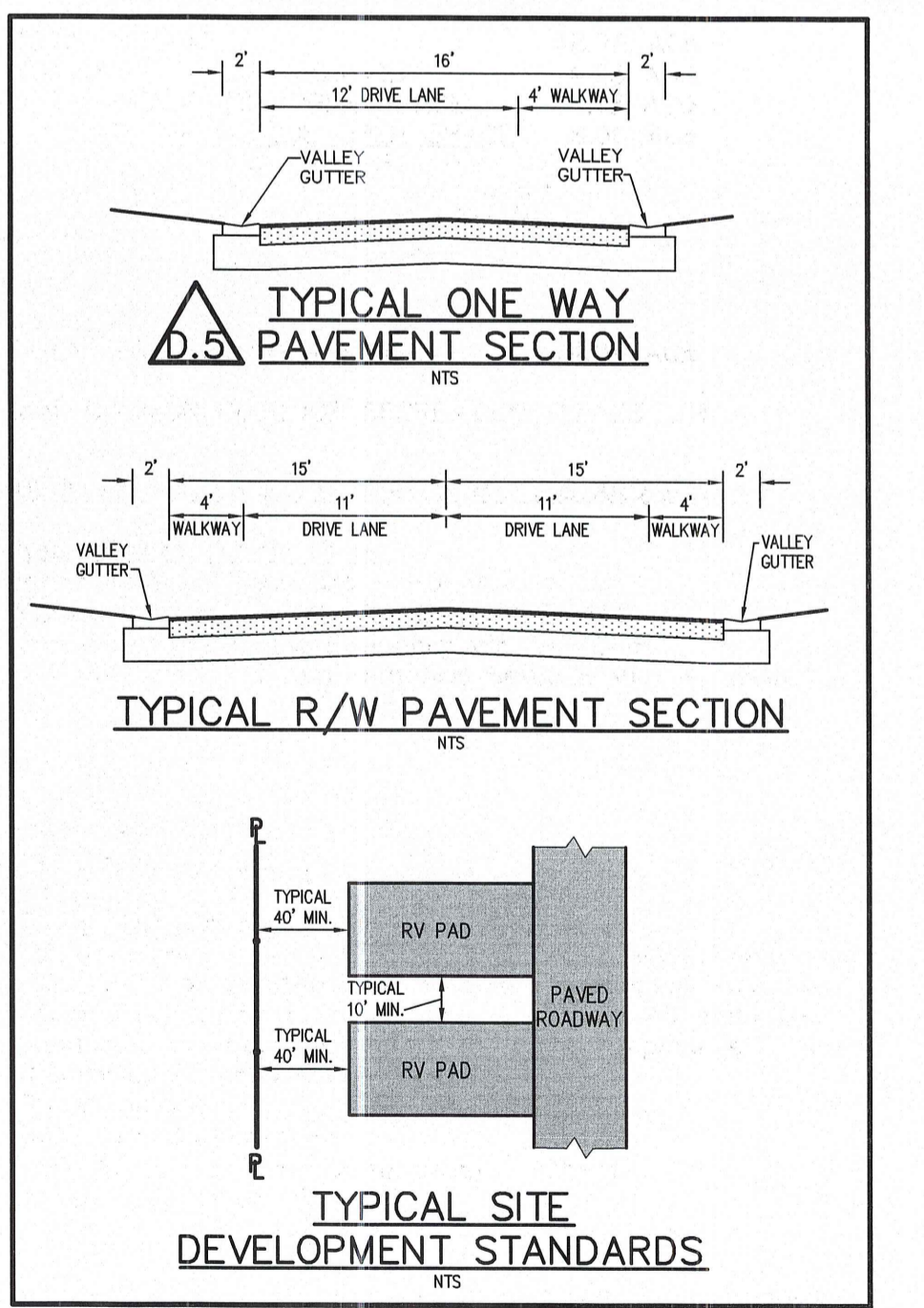
MIN. COMMON OUTDOOR RECREATION: 12,183 SF±

**BERMUDA LAKES RVPD DEVELOPMENT STANDARDS**

**Recreational Vehicle Units:**  
Internal Street Setbacks - 10-ft.  
Between RV Min. - 10-ft. (5-ft. & 5-ft.)  
From Park Perimeter Boundary Min. - 40-ft.  
Internal Walls and Appurtenance Setback Min. - 10-ft.  
Water Body Min. - 25-ft.  
Side Yard Min. - 10-ft.  
Rear Yard Min. - 10-ft.  
Max Lot Coverage - None  
Tie-downs - LDC 34-762(2)  
RV Storage - LDC 34-762(4)

**Group Club House:**  
Lot Area Min. - No minimum lot area or dimensions required, provided that the area is of sufficient size to accommodate the proposed use as well as all setbacks, parking, drainage, landscaping and other applicable County code requirements.  
Street Setbacks - 25-ft.  
Side Yard Setbacks - 15-ft.  
Rear Yard/Rear Yard Water Body - 25-ft.  
Max. Height - 35-ft.  
Max. Lot Coverage - 50%

**Maintenance Building and Operations/Open Storage Area:**  
Lot Area Min. - No minimum lot area or dimensions required, provided that the area is of sufficient size to accommodate the proposed use as well as all setbacks, parking, drainage, landscaping and other applicable County code requirements.  
Street Setbacks - 20-ft.  
Side Yard Setbacks - 10-ft.  
Rear Yard/Rear Yard Water Body - 10-ft.  
Max. Height - 35-ft.  
Max. Lot Coverage - None  
Other - LDC 34-762(4)



**RECEIVED**  
JUN 26 2014  
FLYOVER RAMP - COMMUNITY DEVELOPMENT  
DCI 2014-00010

NO.	DATE	REVISION DESCRIPTION	BY
2	6/25/2014	MASTER CONCEPT PLAN REVISIONS	EMH
1	5/19/2014	MASTER CONCEPT PLAN REVISIONS	EMH

**Stuart and Associates**  
Planning & Design Services  
www.StuartUrbanDesign.com

**BANKS ENGINEERING**  
Professional Engineers, Planners, & Land Surveyors  
Serving The State Of Florida  
10511 SIX MILE CYPRESS PARKWAY  
FORT MYERS, FLORIDA 33966  
PHONE: (239) 939-5490 FAX: (239) 939-2523  
ENGINEERING LICENSE # EB 6469  
SURVEY LICENSE # LB 6690  
WWW.BANKSENG.COM

MASTER CONCEPT PLAN THE BURMUDA LAKES RV RESORT PLANNED DEVELOPMENT LEE COUNTY, FLORIDA						
DATE	PROJECT	DRAWING	DESIGN	DRAWN	CHECKED	SHEET
5/12/2014	2062NT	MCP		EMH		1