



# CONSERVANCY of Southwest Florida

OUR WATER, LAND, WILDLIFE, FUTURE.

March 22, 2013

The Conservancy of Southwest Florida has begun to review the revised Future Land Use Element (FLUE). We appreciate the hard work that has gone into the revised draft element, and look forward to working with staff in the next few weeks as the element is revised and reworked.

While we are generally supportive of most of the changes, we will need to review the data and analysis (which is not yet available) to help us understand some of the changes in context. We will also need to examine the proposed changes in the FLUE Map (FLUM) carefully as we may have suggestions or comments about the FLUM.

The comments below are intended to highlight some of the important issues we have identified thus far:

- The general recommendations do not include incentivizing and prioritizing infill and redevelopment. (page 4)
- Policy 1.1.2.d should not just support mixed use centers but also incentivize their development. (page 9)
- Policy 1.4.3 references a July 28, 1993 Henigar & Ray study entitled "Groundwater Resource Protection Study" as the document with the best environmental management practices to protect potential groundwater resources. Is this the correct document? (page 17)
- Policy 2.3.4 discourages amendments to the Lee Plan which promote urban sprawl, which we support. However there are no policies which state what Lee County considers to be sprawl or if there are some aspects of sprawl (as defined by the Florida Statutes) that are of more concern to Lee County than others. (page 38)

- Policy 2.4.5.c doesn't references compensating areas that request less density with more density. If the intent is to provide additional density units to transfer off the property, then that should be specified. (page 40)
- Policy 3.4.1.a should prioritize and incentivize redevelopment and infill development. (page 49)
- Objective 3.6 (page 53) states that introduction or expansion of agricultural uses into Urban Areas will be discouraged. On February 20, 2013, the University of Florida hosted a Lee County Urban Farm Tour. This tour sold out. "Urban Farming" has been increasing in Lee County, and has been attracting people to Lee County. Has care been taken to ensure that none of the existing Urban Farming operations will be rendered nonconforming? Also, should this type of activity - urban farms, which can include roof top garden areas and working landscapes be discouraged?
- Policy 3.6.8 does not allow for the possibility that new planned developments may be centered around urban farming and providing agriculture and homesteading opportunities for the residents. Is that the intent of this policy? (page 54)
- Policy 4.1.1 (page 68) and Policy 4.2.1 (page 70) refer to a balance of residential, economic and public space areas in mixed use development, however, there is no suggestion or requirement of what this minimum balance should be.