



TIMBER CREEK

Comprehensive Plan Amendment

CPA2016-00007

March 27, 2017

Lee County

Local Planning Agency



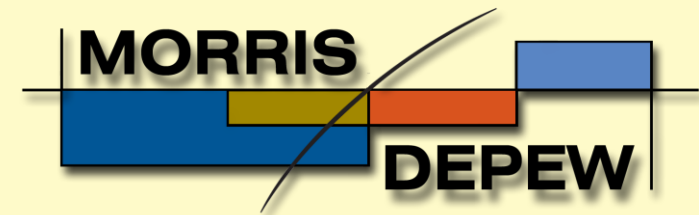
INTRODUCTION

**PAVESE
LAW FIRM**

Steven C. Hartsell, Esq

Professional Consultants

- **Steven C. Hartsell, Esq**
Pavese Law Firm
- **Tina M. Ekblad, MPA, AICP, LEED AP**
- **David W. Depew, PhD, AICP, LEED AP**
- **Ryan Shute, PE**
Morris-Depew Associates, Inc.
- **David Brown, P.G.**
Progressive Water Resources, LLC
- **Shane Johnson**
Passarella & Associates, Inc.
- **Ted Treesh**
TR Transportation Consultants, Inc.



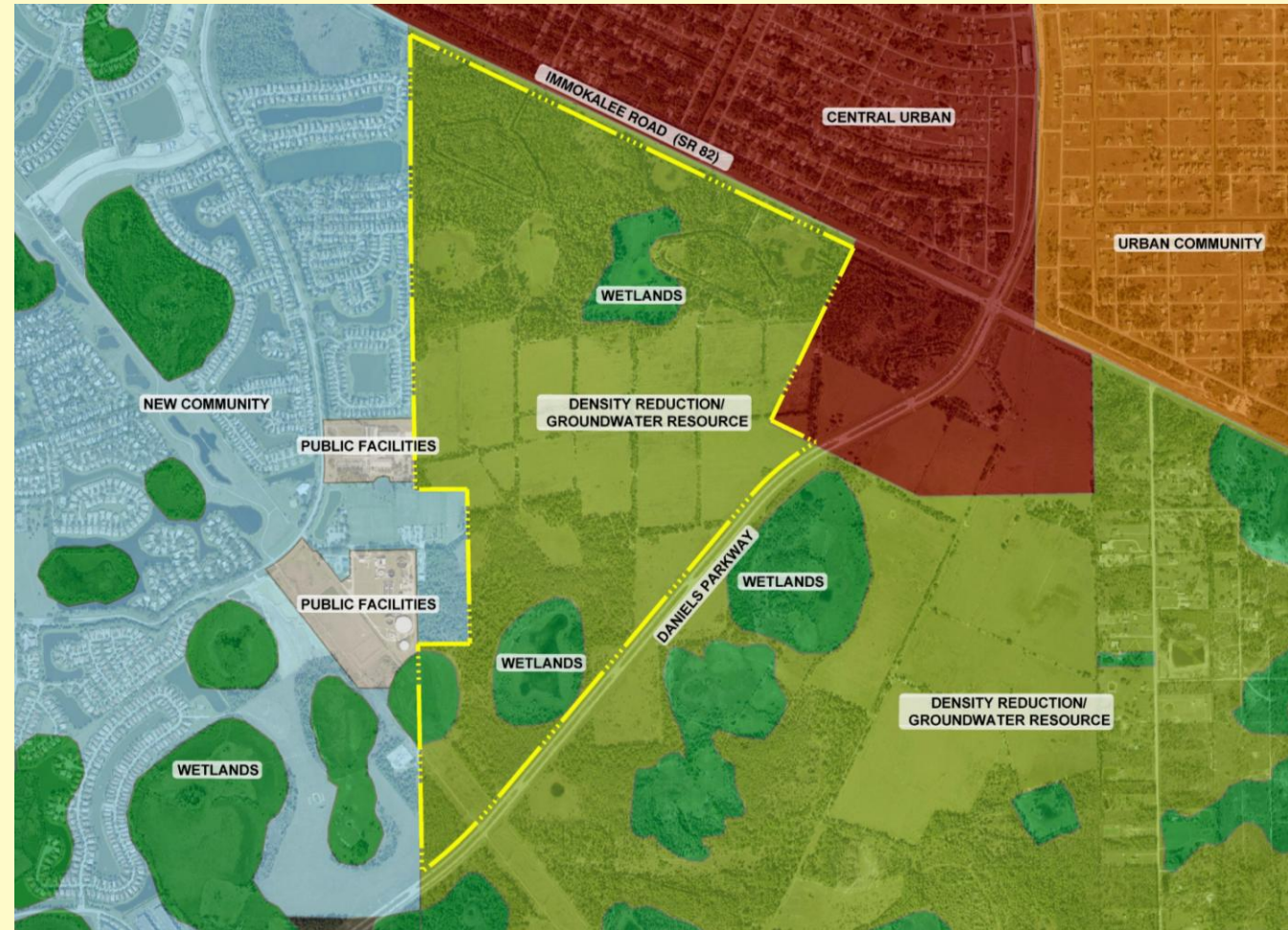
Property Background

- **Owner:**
Jared F. Holes, Trustee
- **Applicant:**
Lennar Corporation
- **Location:**
SW Corner Daniels Parkway & SR 82



Property Location

- Unique location within County
- 628 AC in DR/GR FLUM
- Southeast Lee County Planning Community
- Between two residential communities
 - Gateway
 - Lehigh Acres
- Central Urban Commercial Node
 - Intersection of SR 82 & Daniels Pkwy



Request

- **Future Land Use Map**

 - 479 ac Sub-Outlying Suburban*

 - 149 ac Wetlands*

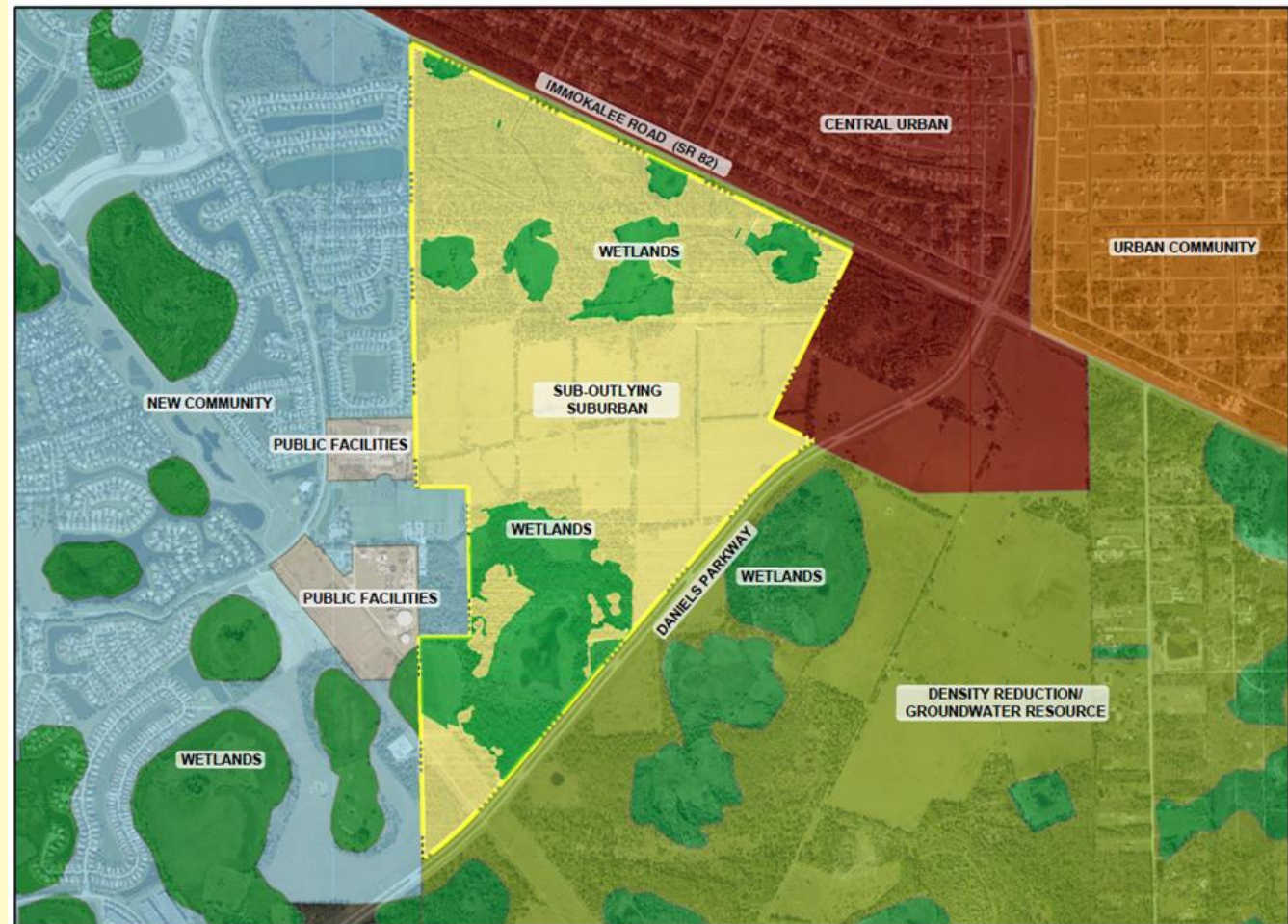
 - 628 ac TOTAL*

- **Planning Community Map**

 - Gateway/Airport*

- **Table 1(b)**

 - Gateway/Airport*



Supporting Map Amendments

Future Land Use Map Series

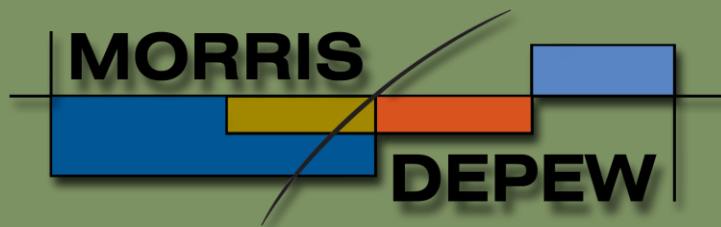
- Map 1 Page 2 of 8, Special Treatment Areas
 - *eliminate the subject property from the special treatment area.*
- Map 1 Page 4 of 8, Special Treatment Areas
 - *eliminate the subject property from the special treatment area.*
- Map 4, Private Recreational Facilities Overlay
 - *eliminate the property from the Private Recreational Facilities Overlay*
- Maps 6 and 7, Lee County Utilities Future Water & Sanitary Sewer Service Areas
 - *extend the existing service area to cover the remainder of the subject property.*
- Map 14, Future Limerock Mining Overlay
 - *eliminate the ±628 acers of the subject property from the Southeast Lee County Area.*
- Map 17, Southeast DR/GR Residential Overlay
 - *remove the property from the Southeast DR/GR Residential Overlay.*
- Map 20, Continuous AG Parcels over 100 acres
 - *remove the property from the Southeast Lee County Area.*

Concurrent Zoning



- Florida Statutes Chapter 163.3184(12)
“at the request of an applicant a local government shall consider an application for zoning changes that would be required to properly enact any proposed plan amendment transmitted pursuant to this subsection.”
- DCI2016-00015 was filed on September 15, 2016,
- Master Planned Mixed Use Community
- Zoning application includes Central Urban west of Daniels Prkwy in addition to land in the CPA request

PROJECT BACKGROUND



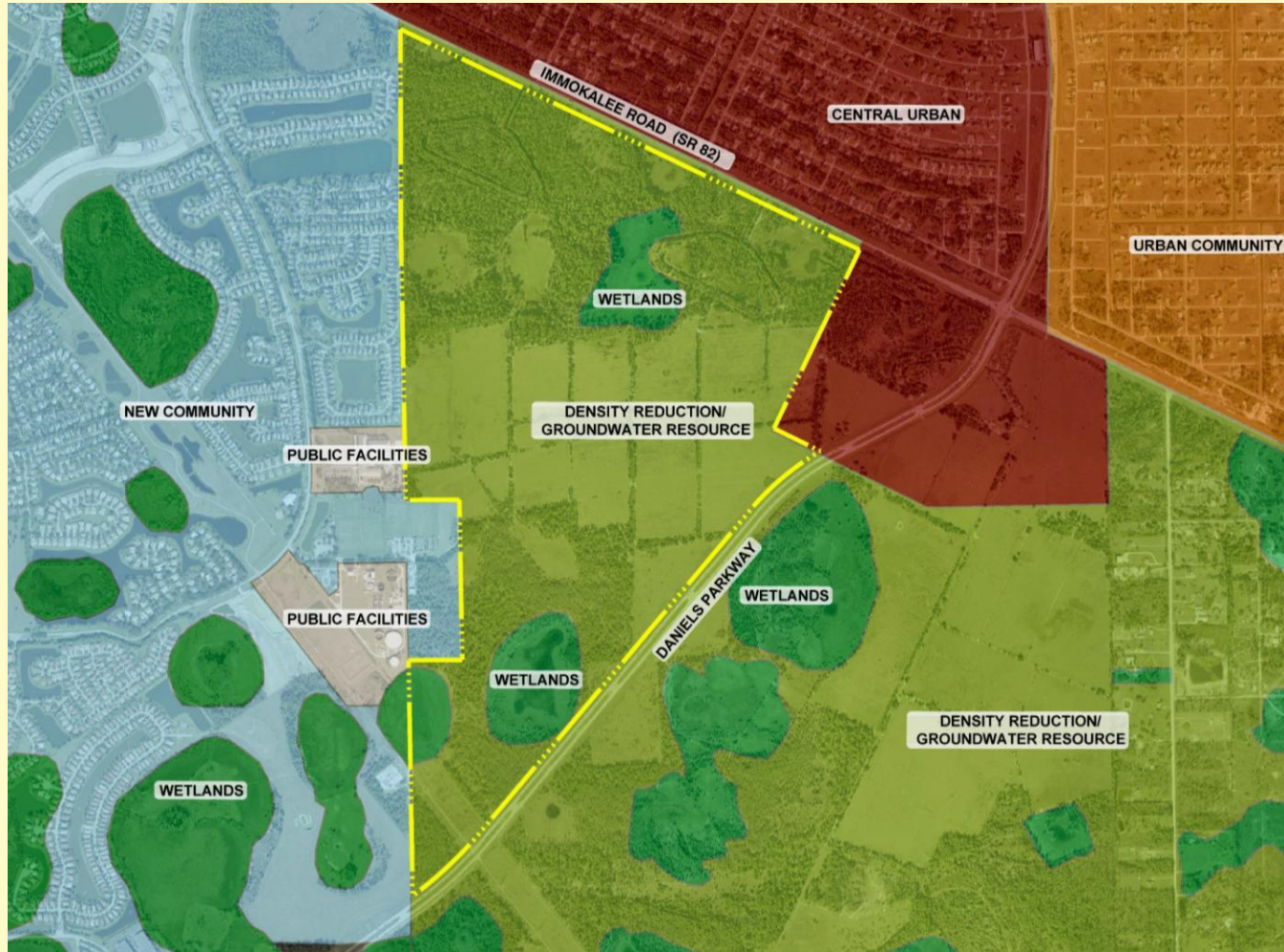
Tina M. Ekblad, MPA, AICP, LEED® AP

Surrounding Development



	Future Land Use	Relevant Notes
North	Central Urban, Urban Community	Lehigh Acres Single & Multi Family, Commercial
South	DR/GR, Tradeport	Agriculture Southwest Florida Regional Airport
East	DR/GR	Large lot residential
West	New Community, Public Facilities,	Single & Multi Family, Commercial, Industrial Airport Related

Future Land Use & Planning Community



- **Density Reduction/Groundwater Resource**
Policy 1.4.5 an area providing substantial recharge to aquifers, which are suitable for wellfield development
- **Wetlands**
Policy 1.5.1 permits low-density residential and recreational uses
- **Southeast Lee County**
Goal 33 seeks to protect natural resources and balance demand for limerock

Uniquely Appropriate for FLU Amendment

- Property surrounded by Urban Development
 - *Lehigh Acres & Mixed Use Node*
 - *Gateway Community*
 - *Southwest Florida International Airport*
 - *State Road 82 & Daniels Parkway*
- Existing Conditions sever the property from DR/GR
 - *Daniels Parkway physical separation*
 - *Minimal Aquifer Recharge and Limestone*
 - *Surface Water does not flow across the property*
 - *Large wildlife is not currently utilizing the property*
 - *Opportunity for interconnectivity lost*



CHARACTERIZATION OF GROUND & SURFACE WATER RESOURCES

David Brown, P.G.



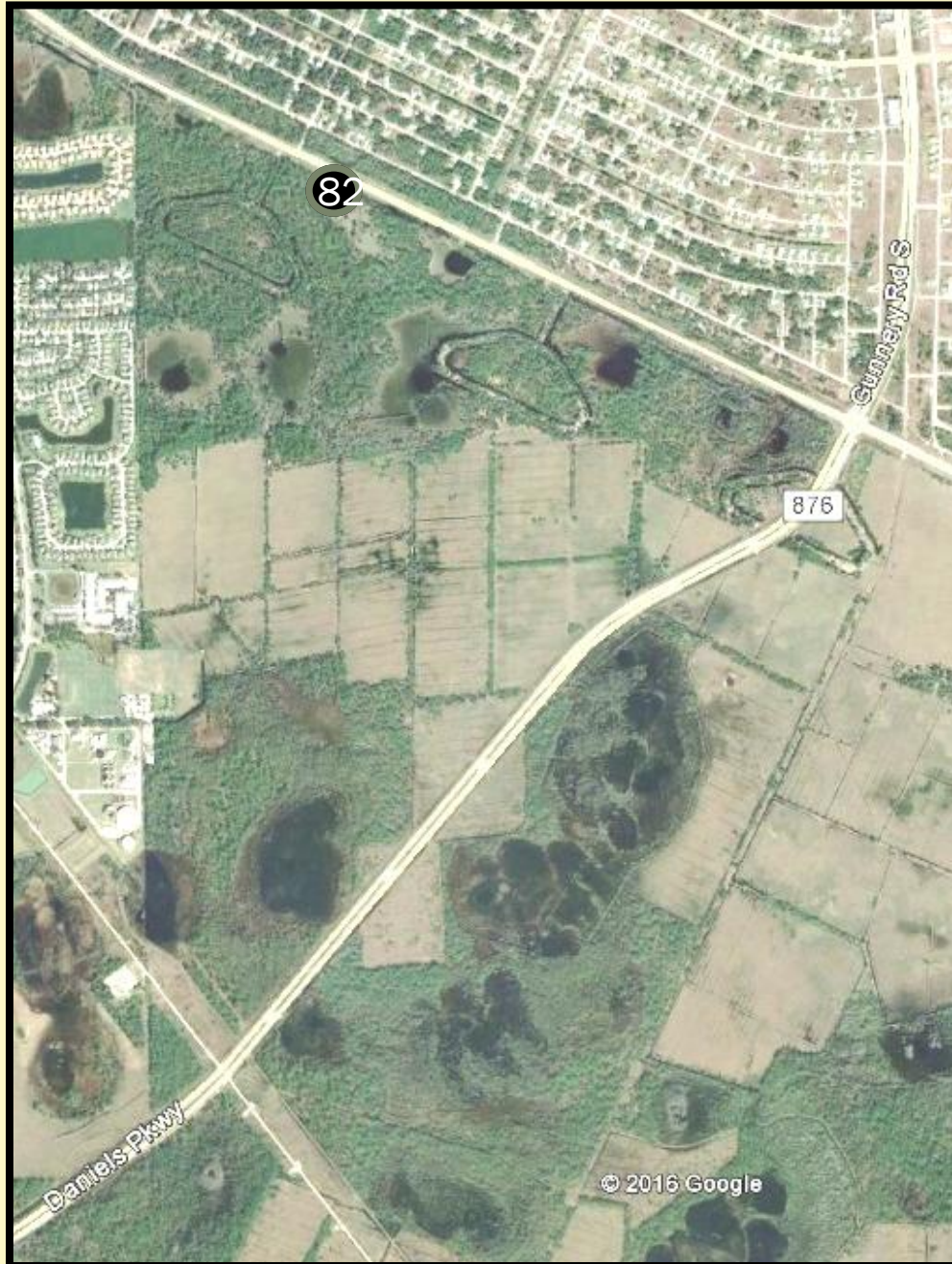
Progressive Water Resources

Integrated Water Resource Consultants

PROPERTY SETTING

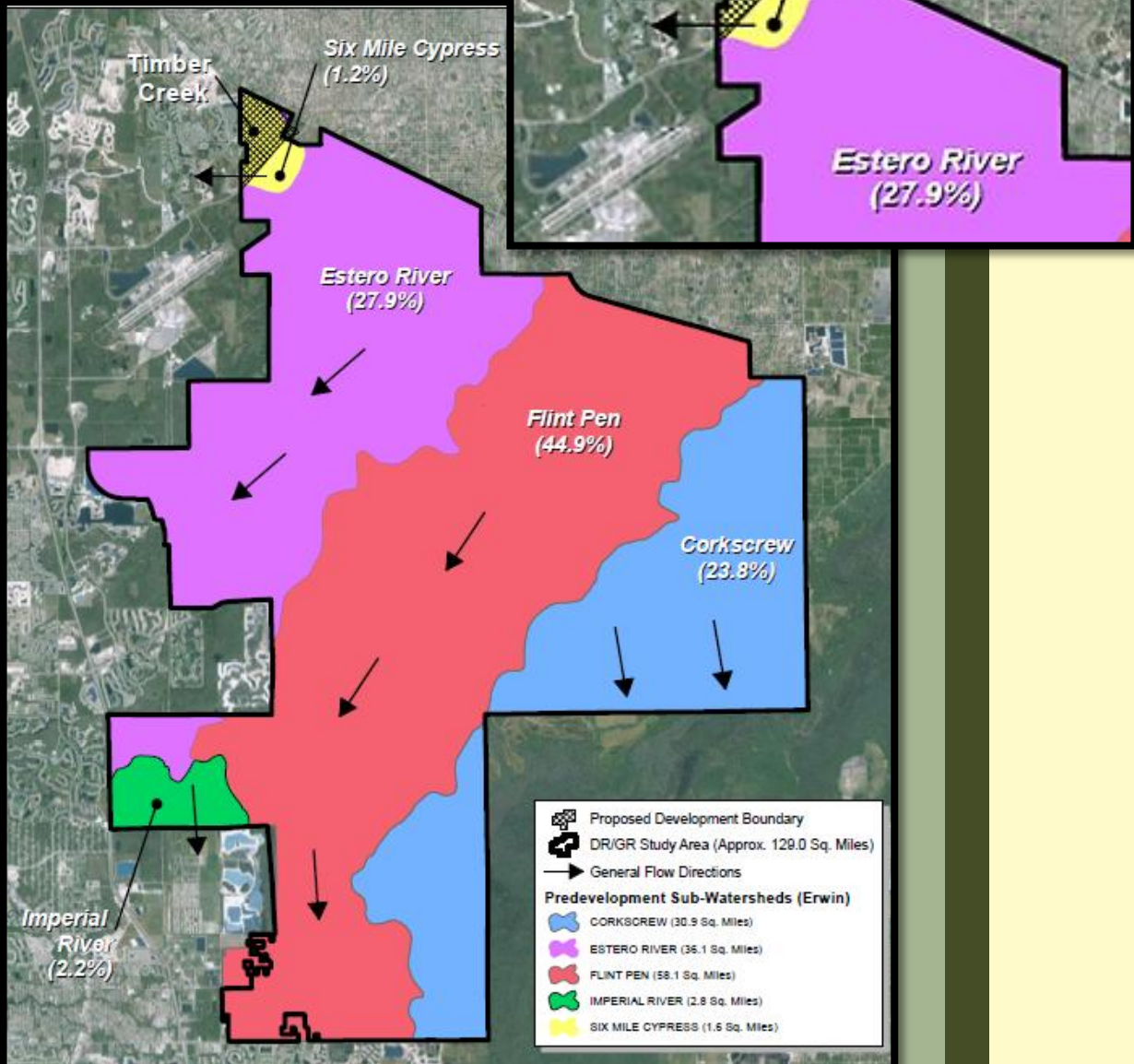
INTRODUCTION

- As a result of its complex history, altered surface water hydrology and distinct hydrogeology, the 628 acre property is significantly different from most areas within the balance of the DR/GR.
- The triangular shaped property is bounded by State Road 82 to the north, Daniel's Parkway to the southeast, and the Gateway development to the west.
- The existing physical boundaries effectively limit surface water resource interaction and further isolate the property hydrologically.



Timber Creek

Historical Perspective



- The DR/GR has been described as having five (5) predevelopment sub-watersheds.
- The Timber Creek property is located within the Six Mile Cypress sub-watershed, which represents only 1.2 percent of the DR/GR land area.
- The Six Mile Cypress sub-watershed flows to the west-northwest, whereas the other DR/GR sub-watersheds flow to the south to southwest.

Note: "Predevelopment Sub-Watersheds" GIS data provided by Lee County

PROPERTY SETTING

Historical Perspective

- Prior to agricultural development, the project site was characterized as open rangeland and pine flatwoods, interspersed with isolated wet prairies and shallow freshwater marshes.
- Review of multiple vintages of historic aerial photographs indicates that the site exhibited drier antecedent conditions. No historical surface water flow-ways were observed in any historical aerial photographs (1944 - 1974).
- Two prominent triangular-shaped elevated berms are evident in the 1944 aerial imagery and were created onsite as part of a military training facility prior to WWII.

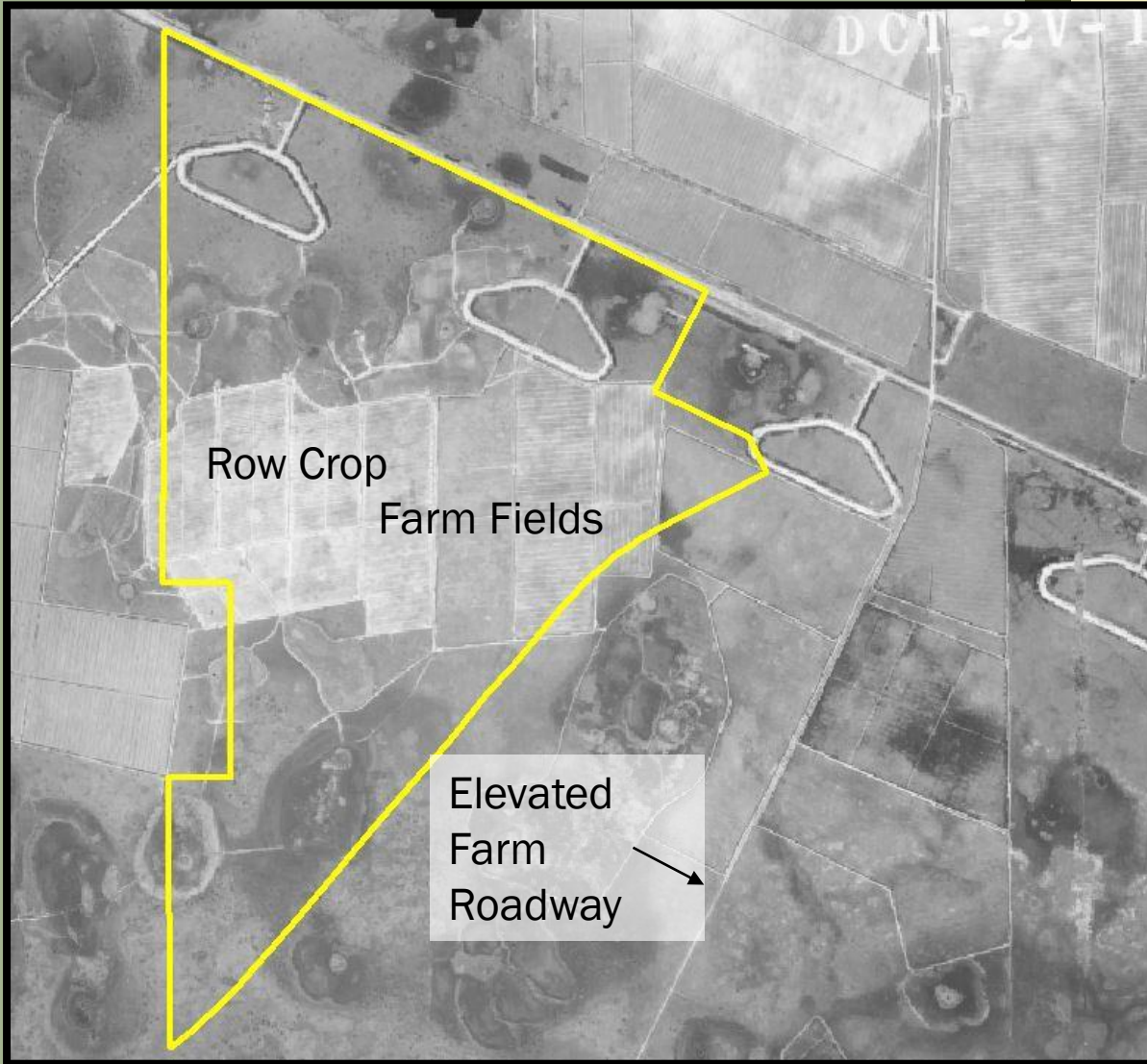


1944 Aerial Image

PROPERTY SETTING

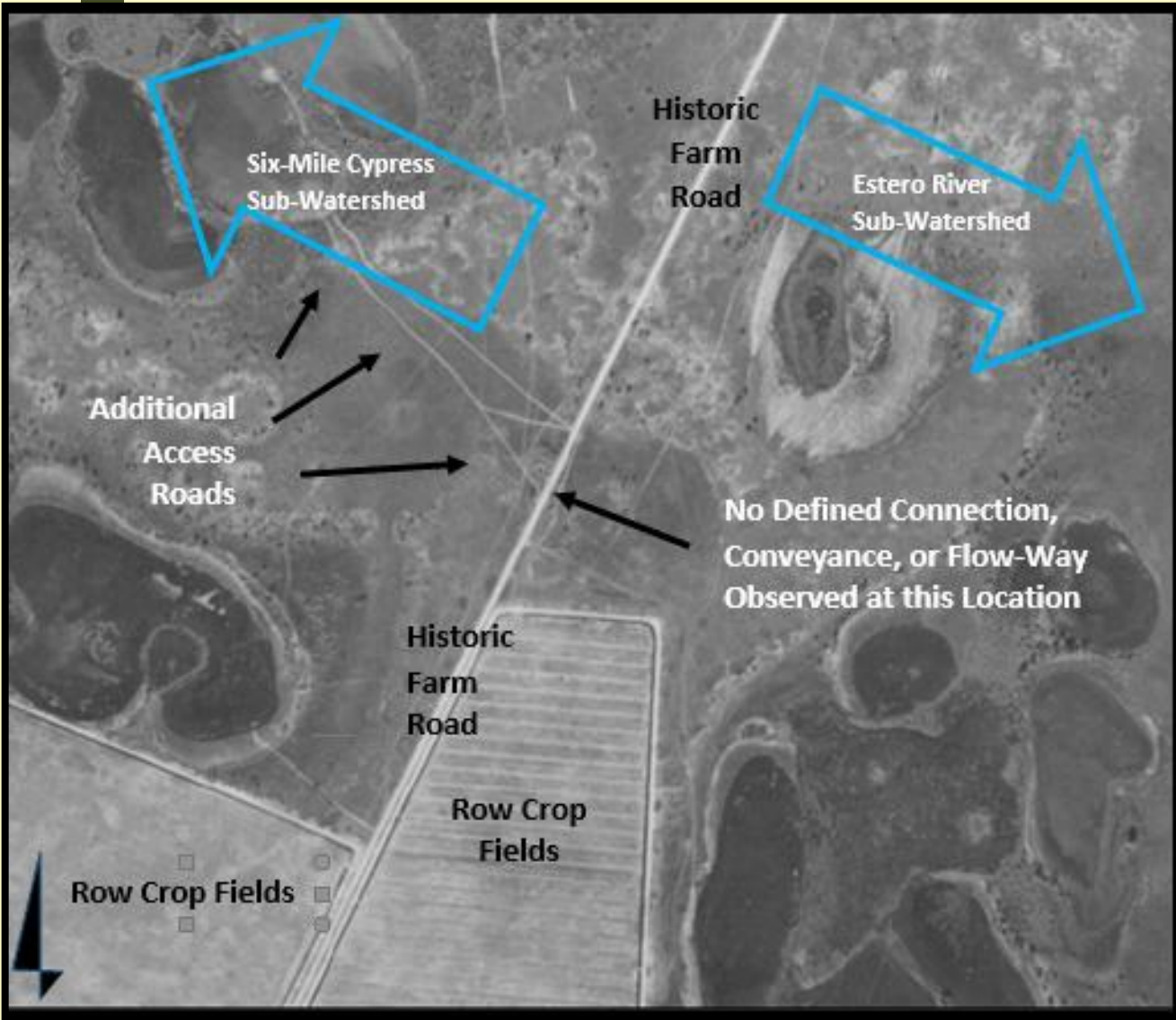
Historical Perspective

- By 1958, the interior of the 628 acre Timber Creek property was already being developed for agricultural row crops with internal drainage ditches and access roads.
- In addition, a network of fields and agricultural roadways were constructed to the east of the subject property, including a prominent elevated farm roadway.
- The elevated farm roadway was constructed to facilitate year-round access to farm fields further to the south.



1958 Aerial Image

Close-Up Aerial Image



1958 Aerial Image

PROPERTY SETTING

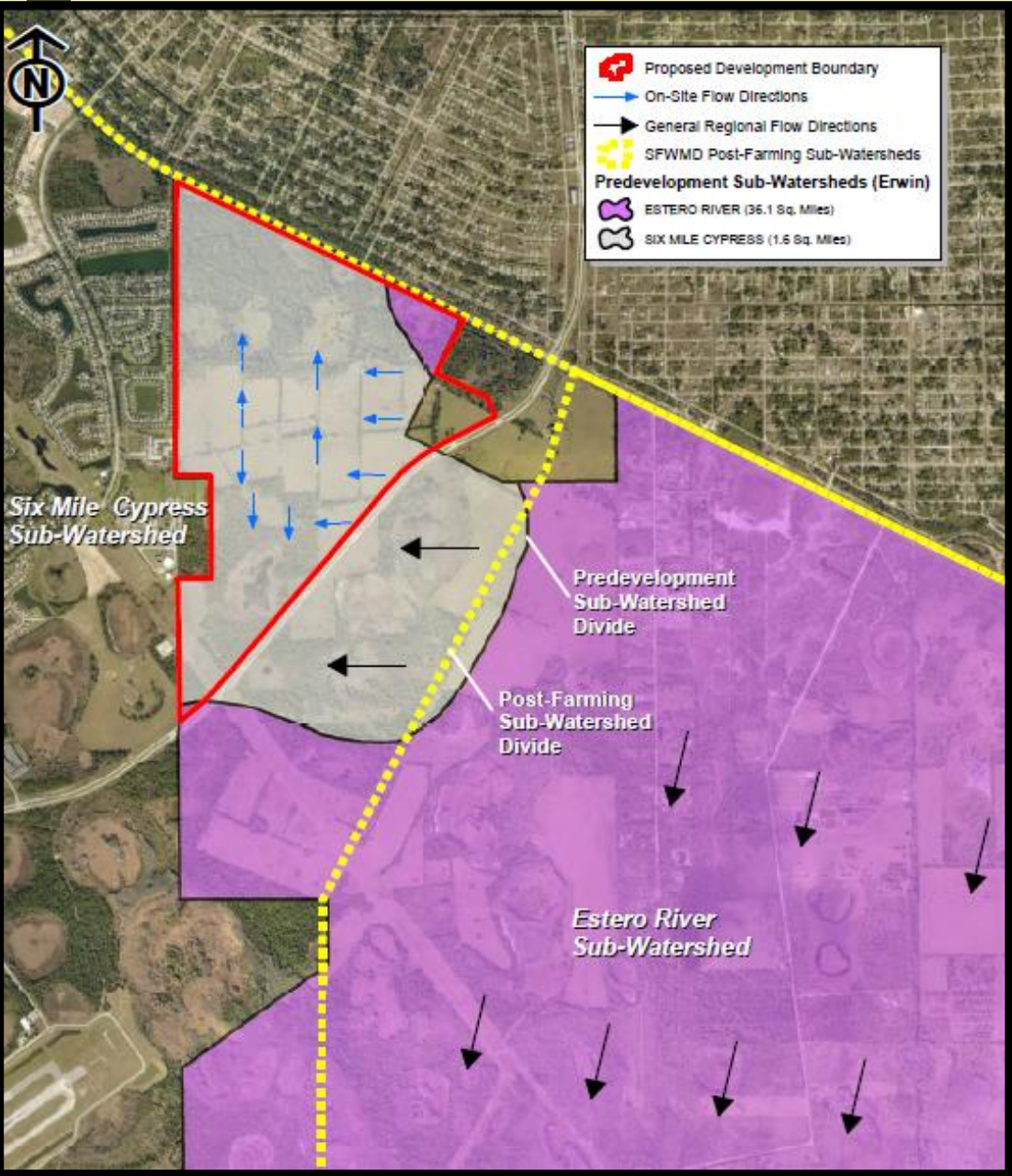
Historical Perspective

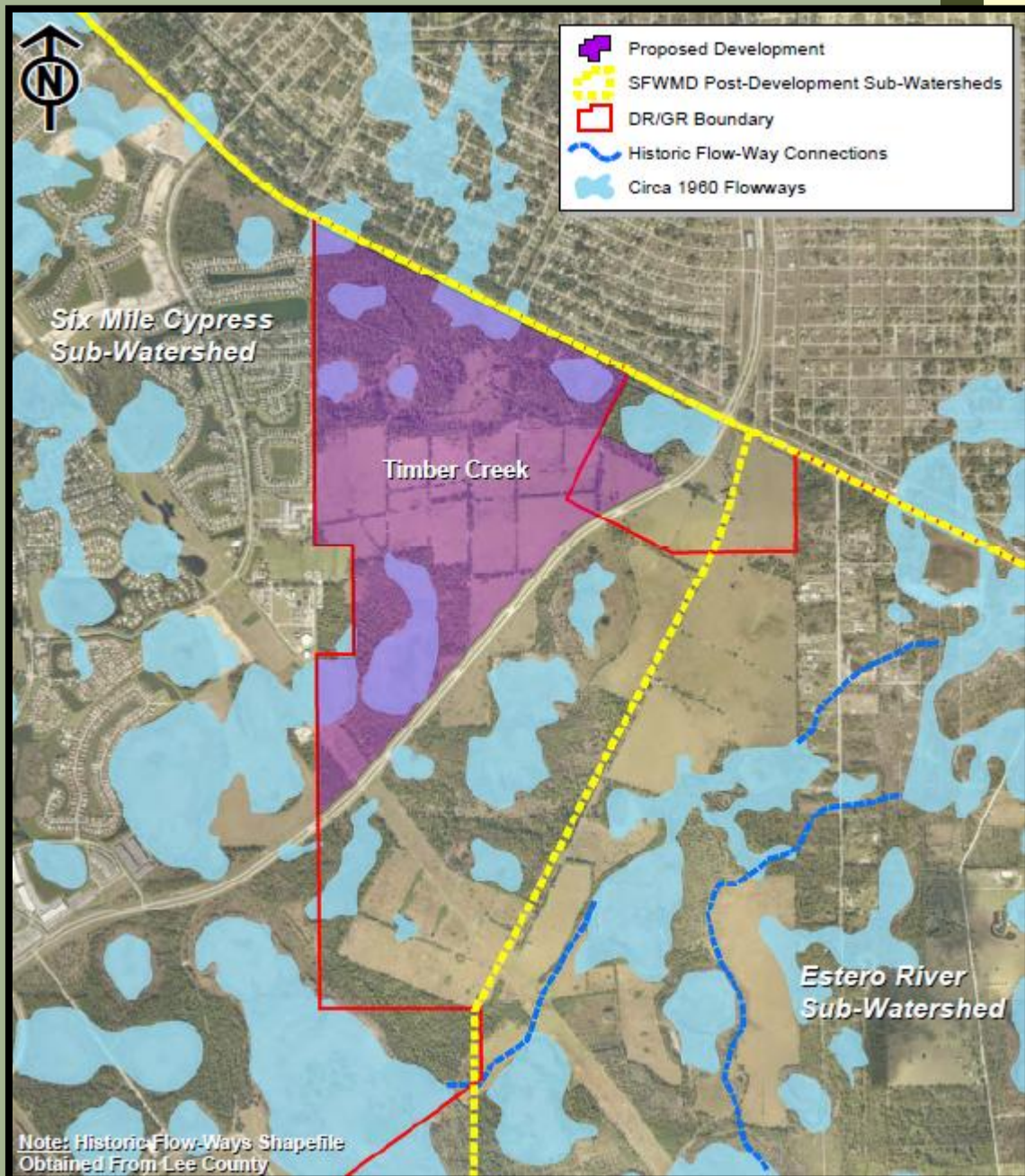
- The historical elevated farm roadway redefined the surface water basin divide between the Six-Mile Cypress and Estero River sub-watersheds.
- This elevated roadway acts like an earthen berm by preventing surface water associated with the balance of the DR/GR from interacting with properties to the west of the basin divide, including the Timber Creek property.

PROPERTY SETTING

Historical Perspective

- The historic elevated farm roadway was investigated in August 2016 (height of the rainy season) and was found to be intact and still acts as a surface water basin divide. No defined connection, flow-way or conveyance was observed through or around the roadway. (Daniels Parkway further isolates)





PROPERTY SETTING

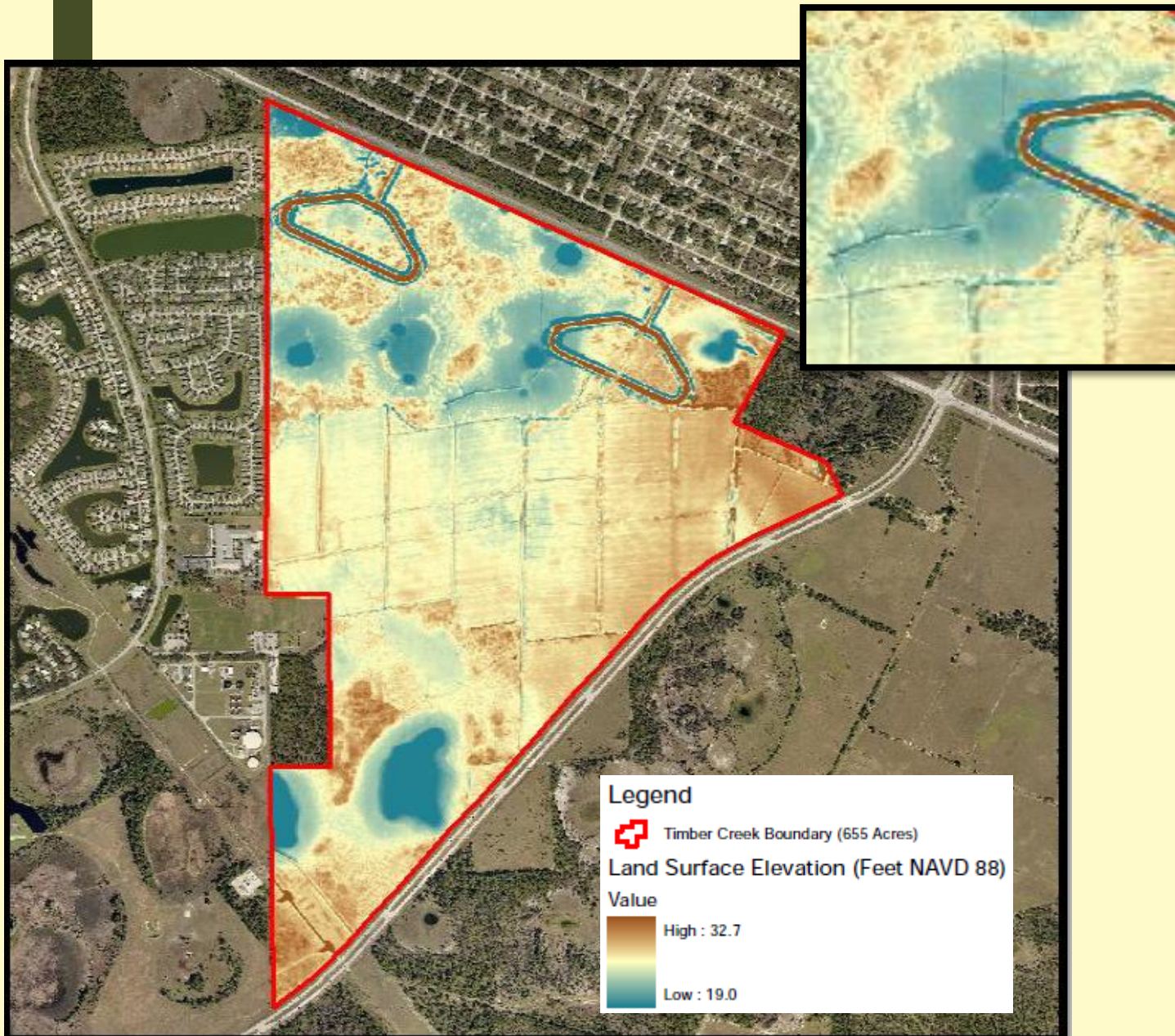
Historical Perspective

- The lack of surface water (hydrologic) connectivity is also clearly illustrated in Lee County’s Historic Flow-ways Map.
- East of farm road the Flow-ways interconnect
- West of Daniels, “Flow-ways” are isolated, do not interconnect, and are not Flow-ways
- As shown, the Timber Creek property is not intersected by historic flow-way connections and has been hydrologically separated for decades. The basin divide is also recognized by SFWMD.

PROPERTY SETTING

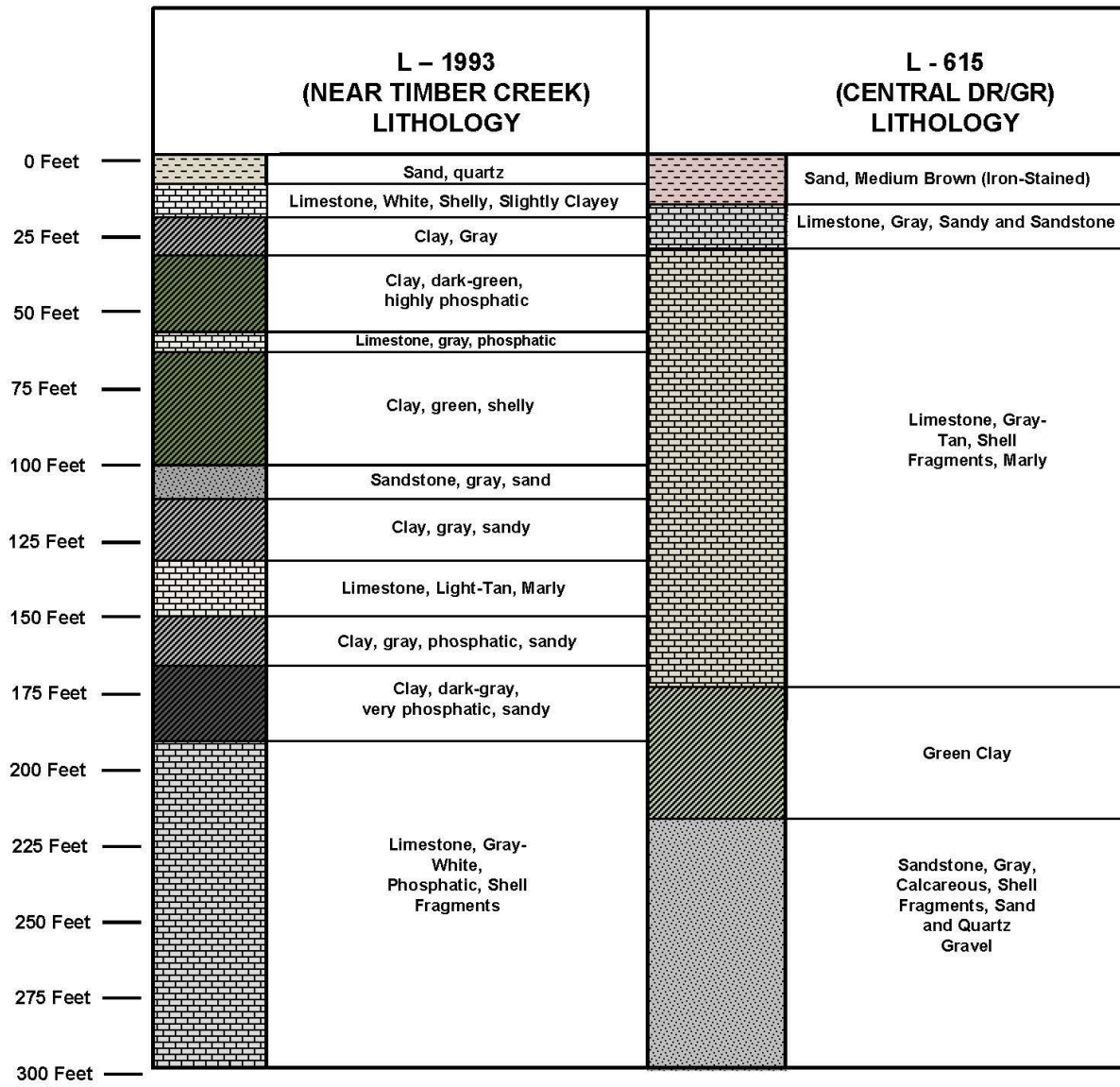
Existing Conditions

- LIDAR imagery clearly identifies the highly altered aspect of the property as evidenced by the “grid-work” pattern of intersecting agricultural drainage ditches constructed and maintained for decades.
- These features greatly reduce recharge potential to the Water Table Aquifer since they are designed to direct runoff away from the sandy, interior section of the property and drain surface water away from onsite wetlands.



PROPERTY SETTING

Hydrogeologic Conditions

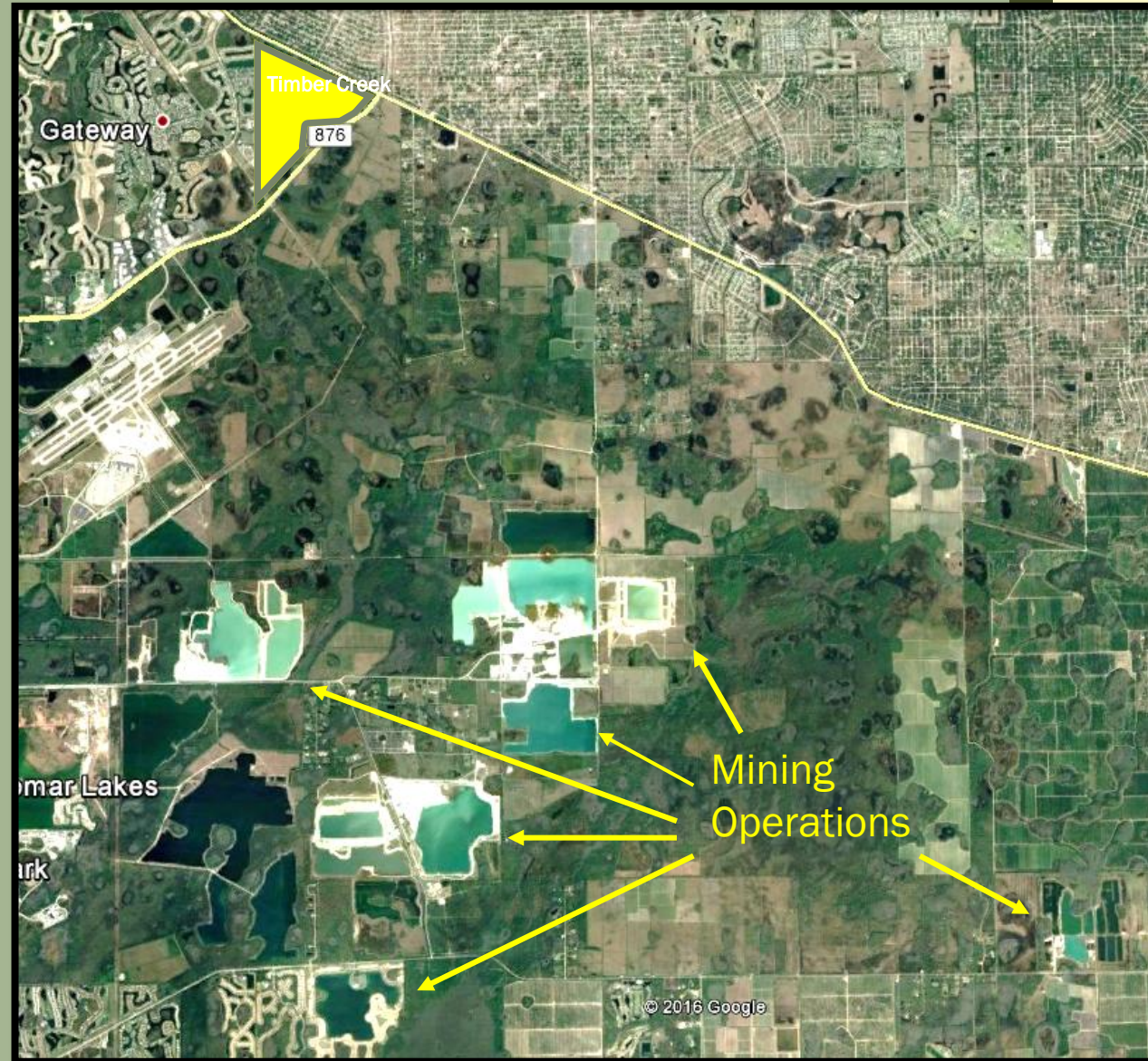


- The hydrogeology of the Timber Creek property is distinctly different from a majority of the DR/GR.
- Stratigraphic columns were developed from United States Geological Service (USGS) Water Resources Investigations Report 85-4161, which illustrates the differences between the shallow, clayey and lower permeability sediments found in the northern DR/GR, i.e., in proximity to the Timber Creek project, as compared to thick sequences of unconfined limestone found in the central and southern sections of the DR/GR.

PROPERTY SETTING

Hydrogeologic Conditions

- The differences in the hydrogeology of the Timber Creek property is clearly evident in recent aerial photographs.
- Areas of thick sequences of limestone are marked by active and past mining operations. No mining has historically occurred in the vicinity of the Timber Creek property and corroborates the USGS stratigraphic descriptions.



SOUTH FLORIDA WATER MANAGEMENT DISTRICT



**WATER USE
NOTICED GENERAL PERMIT**

APPLICATION NUMBER: 150519-8 **PERMIT NO.:** 36-08396-W
DATE ISSUED: June 2, 2015 **EXPIRATION DATE:** June 2, 2035
PERMITTEE: JEFF FLINT
P.O. BOX 627
LEHIGH ACRES, FL 33970
PROJECT NAME: FLINT CATTLE
PROJECT LOCATION: LEE COUNTY, S4,5,8,9,16,17,21/T45S/R26E

This is to notify you of the South Florida Water Management District's (District) agency action concerning your Notice of Intent to use water. This action is taken pursuant to Chapter 40E-2, Florida Administrative Code (F.A.C). Based on the information provided and certified to, District rules have been adhered to and a Water Use Noticed General Permit is in effect for this project subject to:

1. Not receiving a filed request for a Chapter 120, Florida Statutes (F.S.), administrative hearing; and
2. The attached Permit Conditions.

Should you object to the Permit Conditions, please refer to the attached "Notice of Rights" which addresses the procedures to be followed if you desire a public hearing or other review of the proposed agency action. Please contact this office if you have any questions concerning this matter. If we do not hear from you prior to the time frame specified in the "Notice of Rights," we will assume you concur with the District's recommendations.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT this written notice has been mailed or electronically transmitted to the Permittee (and the persons listed in the attached distribution list) this 2nd day of June, 2015, in accordance with Section 120.60(3), F.S. Notice was also electronically posted on this date through a link on the home page of the District's website (my.sfwmd.gov/ePermitting).

BY: 

Simon Sunderland, P.G., Section Leader
Water Use Bureau
South Florida Water Management District

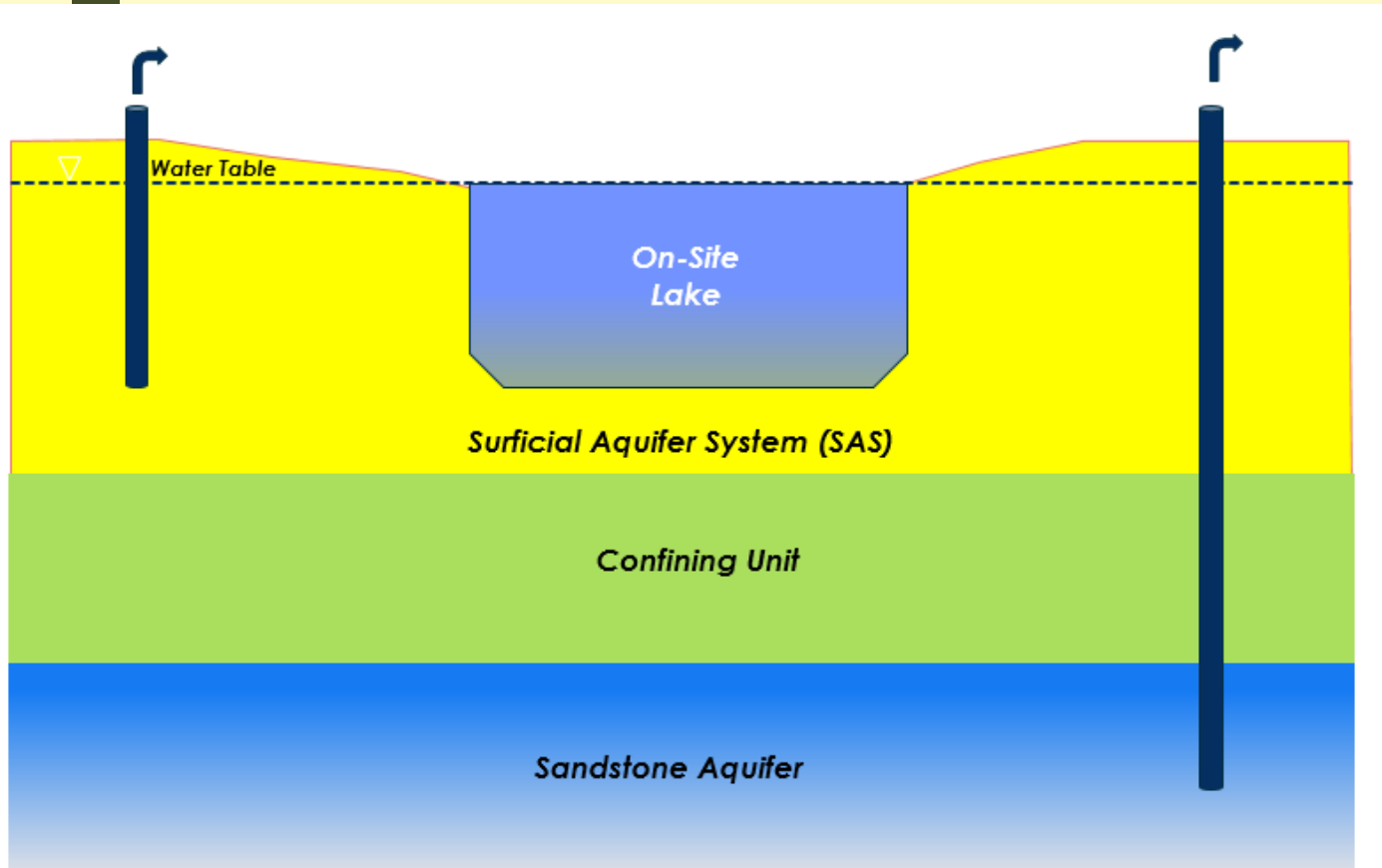
PROPERTY SETTING

Regulatory Authorization and Existing Water Use

- The property is currently part of a SFWMD Water Use Permit.
- Two of the three wells associated with the Water Use Permit occur onsite and are constructed into the shallow Water Table Aquifer.
- Withdrawals from shallow wells can impact nearby wetlands.
- Groundwater withdrawals from the shallow Water Table Aquifer are proposed to be eliminated

PROPERTY SETTING

Hydrogeologic Enhancements



- The proposed development will eliminate the shallow Water Table Aquifer (Surficial Aquifer System) permitted wells and replace them with Sandstone Aquifer (confined aquifer) irrigation wells.
- The proposed Sandstone Aquifer wells virtually eliminates drawdown in the shallow Water Table Aquifer and removes the potential for adverse impacts to onsite wetlands.

TIMBER CREEK

Hydrogeologic Enhancements

- The proposed Timber Creek conceptual design will use groundwater and recycled stormwater (surface water) for irrigation.
- The proposed irrigation method optimizes the use of water supply from each source and thereby reduces impacts to present and future water resources.
- The irrigation system will be a master controlled system whereby no individual homeowner can control the timing or duration of irrigation events.
- Seasonal surface water usage and water conservation measures proposed are consistent with LWCWSP and Policies 2.4.2 and 2.4.3



- The retirement of permitted groundwater quantities sourced from the Water Table Aquifer.
- Elimination of existing internal drainage ditches, thereby improving the potential for recharge to the Water Table Aquifer.
- Lee County Utilities (LCU) is to supply both potable and wastewater services.
- Improved surface water quality through the elimination of cattle grazing and the creation of engineered stormwater management “treatment” facilities.
- Development will adhere to Lee County’s Fertilizer Ordinance No. 08-08.
- Implementation of an integrated ground and surface water irrigation system

TIMBER CREEK

WATER RESOURCE BENEFITS



- A master-controlled irrigation system that regulates the initiation and overall duration of irrigation events to manage irrigation water use and greatly enhance water conservation (no individual homeowner irrigation timers).
- Enhanced opportunities for recharge to the Water Table Aquifer through the creation of numerous stormwater management system lakes (i.e. stormwater retention).
- Substantial environmental restoration associated with the conversion of active cattle grazing acreage into open space habitat, including the preservation and enhancement of onsite forested conservation areas.
- The removal of earth berms associated with past military exercises.

TIMBER CREEK

WATER RESOURCE BENEFITS



CONCLUSION

Based upon my review of historical aerial photographs, published hydrogeological reports, SFWMD regulatory documents, reports and maps obtained from Lee County, and detailed inspections of the site and adjoining properties it is my professional opinion that the proposed Timber Creek property is hydrogeologically distinct and isolated from the balance of lands within the DR/GR and that the proposed land use will help benefit and restore the site and improve the overall water resources.

It is my professional opinion that the data and analysis supports the proposed Comprehensive Plan changes and Map Amendments. The proposed changes meet the requirements of Florida Statutes Chapter 163, are consistent with the Lee Plan, Land Development Code, and the data and analysis demonstrate the proposed changes will not cause any significant harm to present and future public water resources.

David J. Brown, P.G.

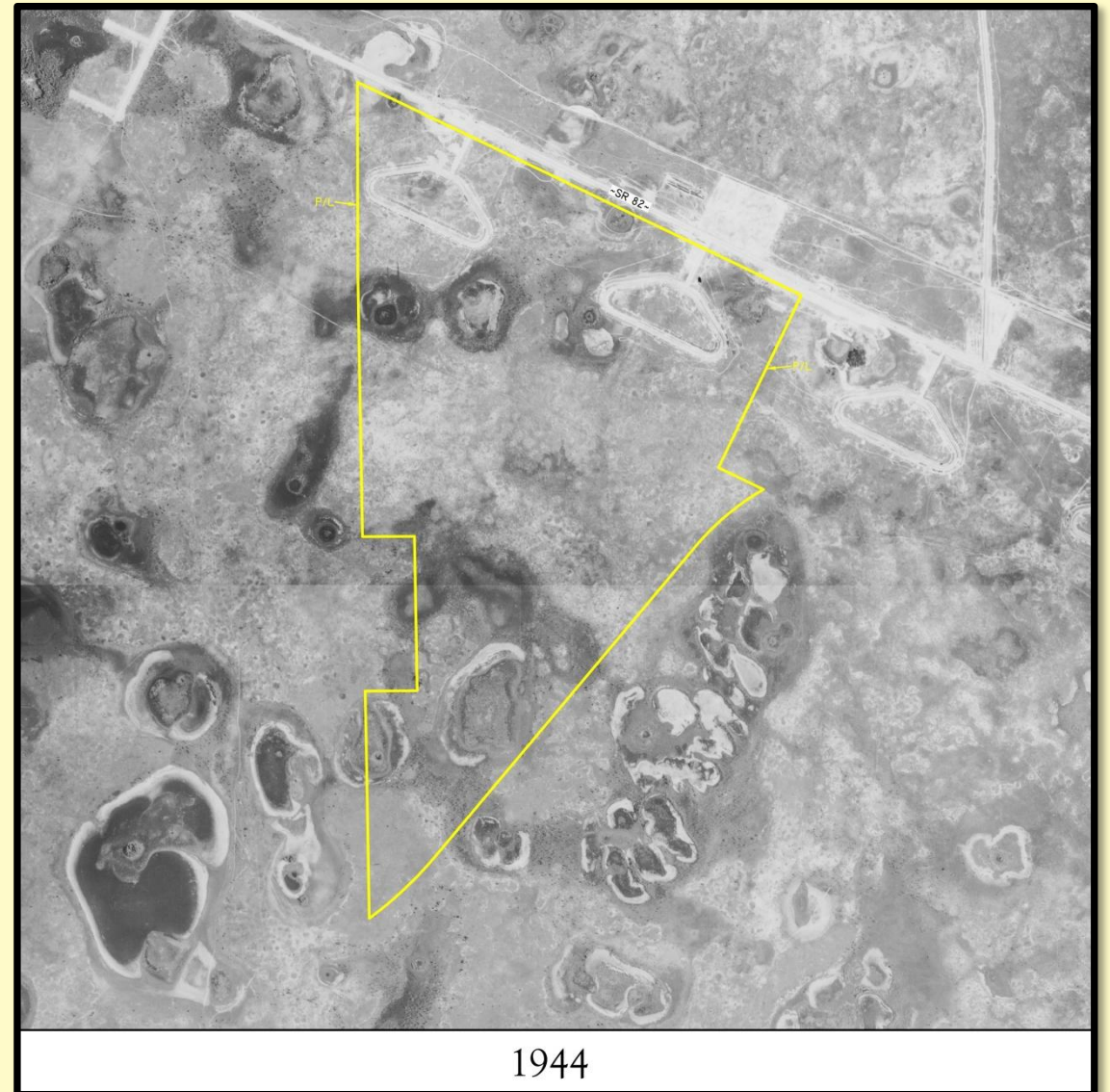
ENVIRONMENTAL RESOURCES



Shane Johnson

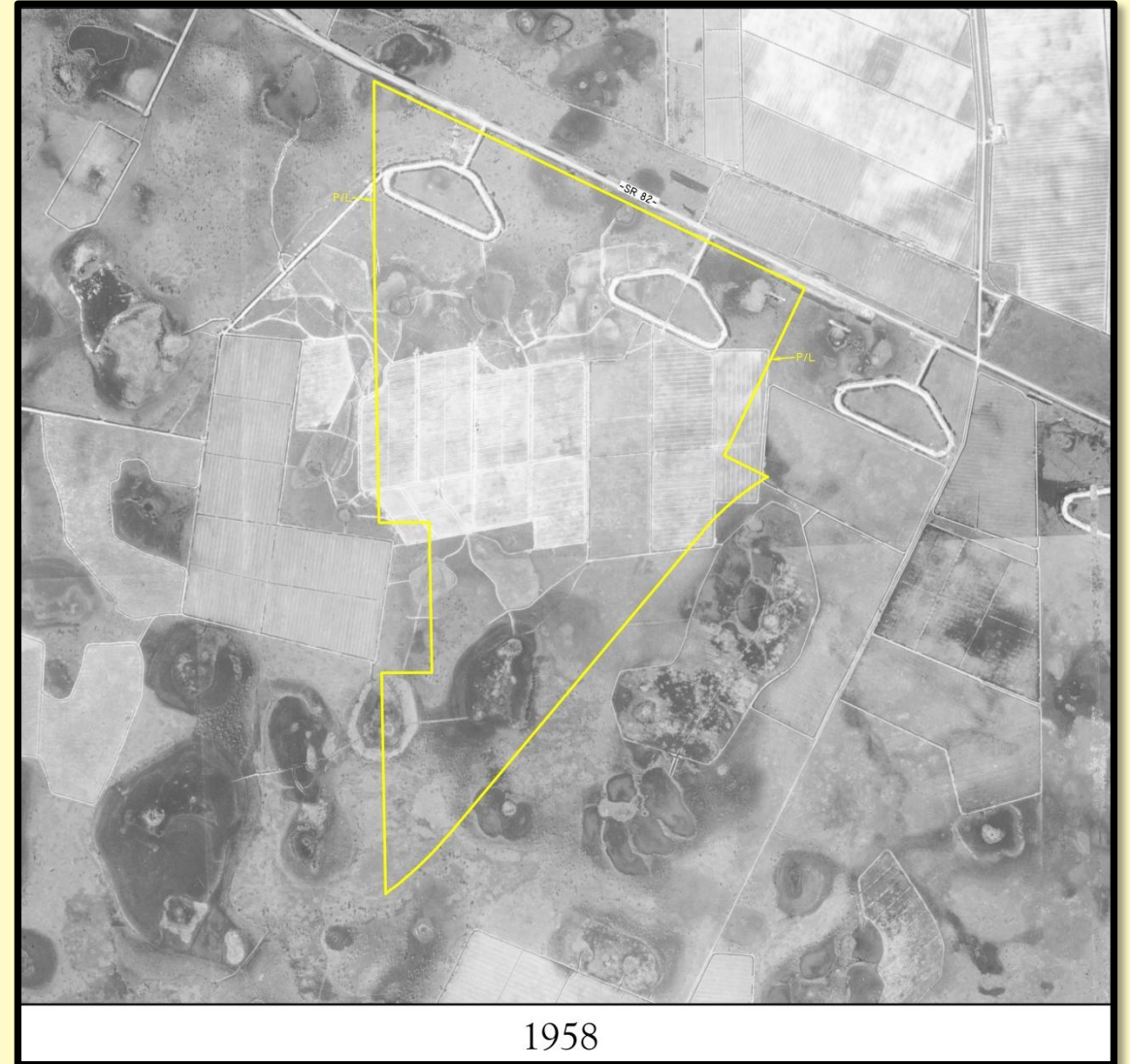
Historical Background

- Majority of the site was undeveloped in 1944
- Construction of U.S. Army Air Corps target ranges (coat hangers) on northern portion of the site by early 1940s
- Development of State Road 82 to the north



Historical Background

- Clearing and ditching of portions of the Project for agricultural activities began by 1953
- By 1958, the agricultural activities spanned the entire central portion of the site



1958

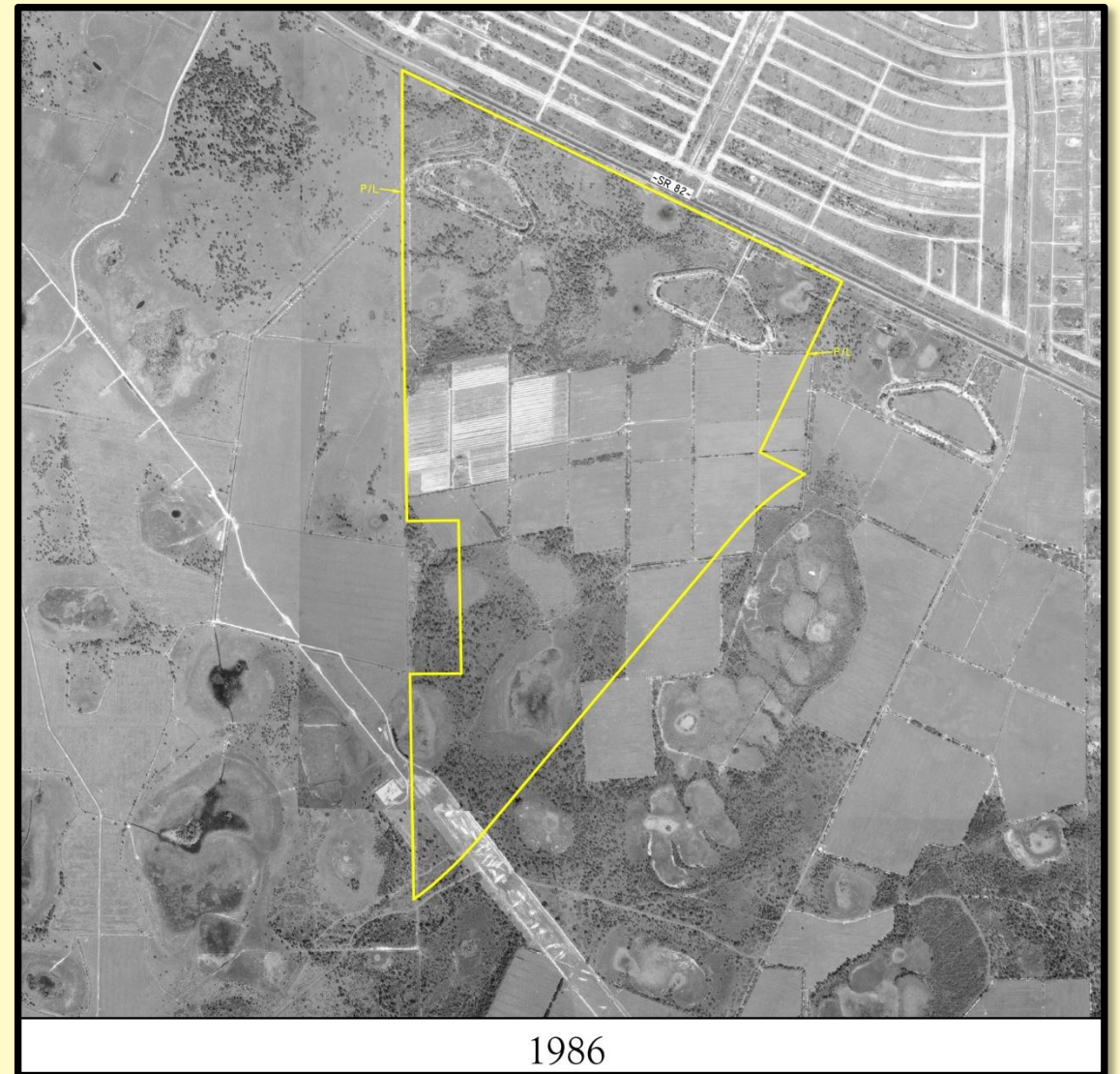
Historical Background

- By 1968, the agricultural activities expanded east and south along the Project boundary



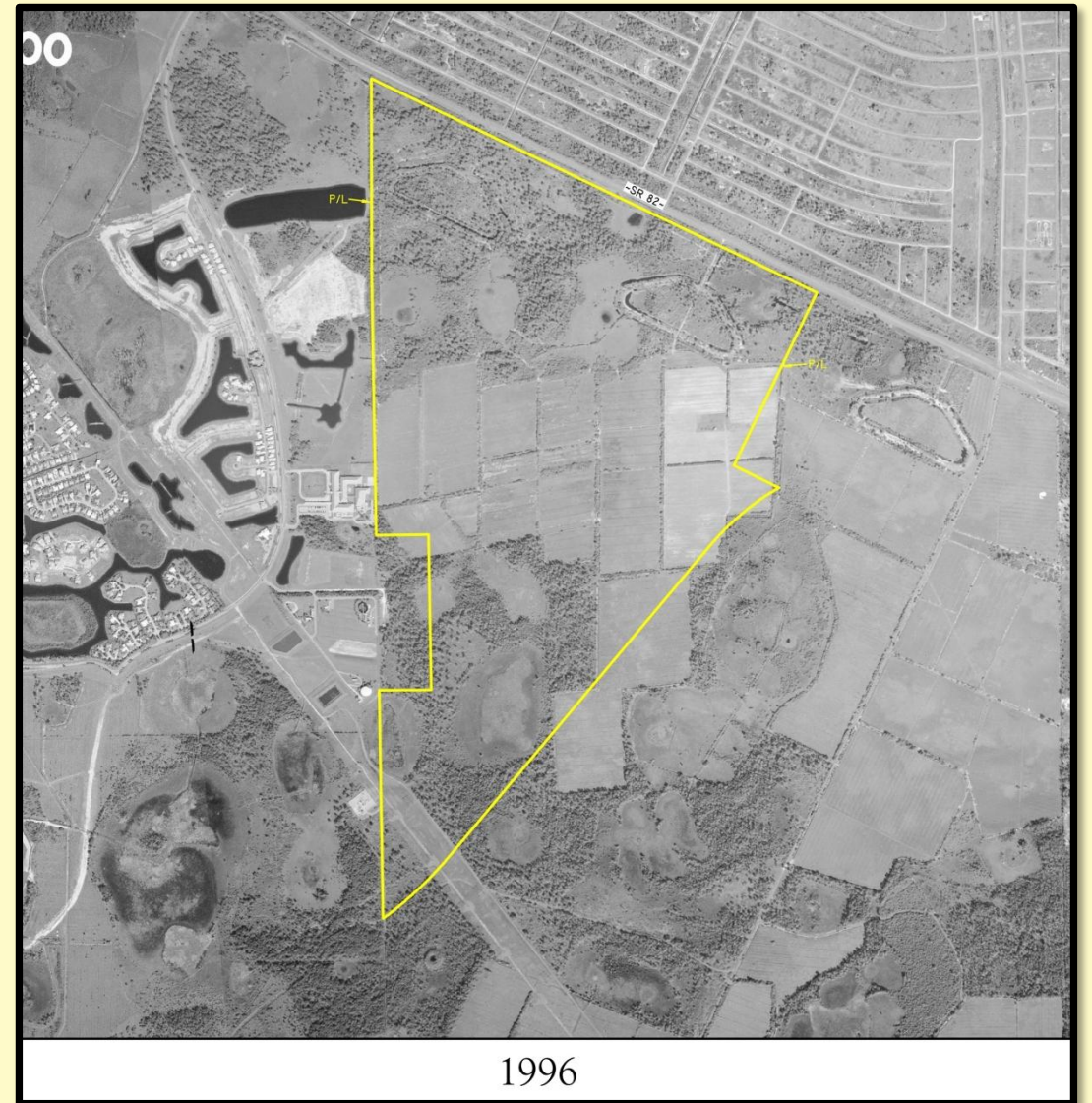
Historical Background

- By 1986, the development of Lehigh Acres was well underway to the north
- Construction of the FPL easement in the southern portion of the site had commenced



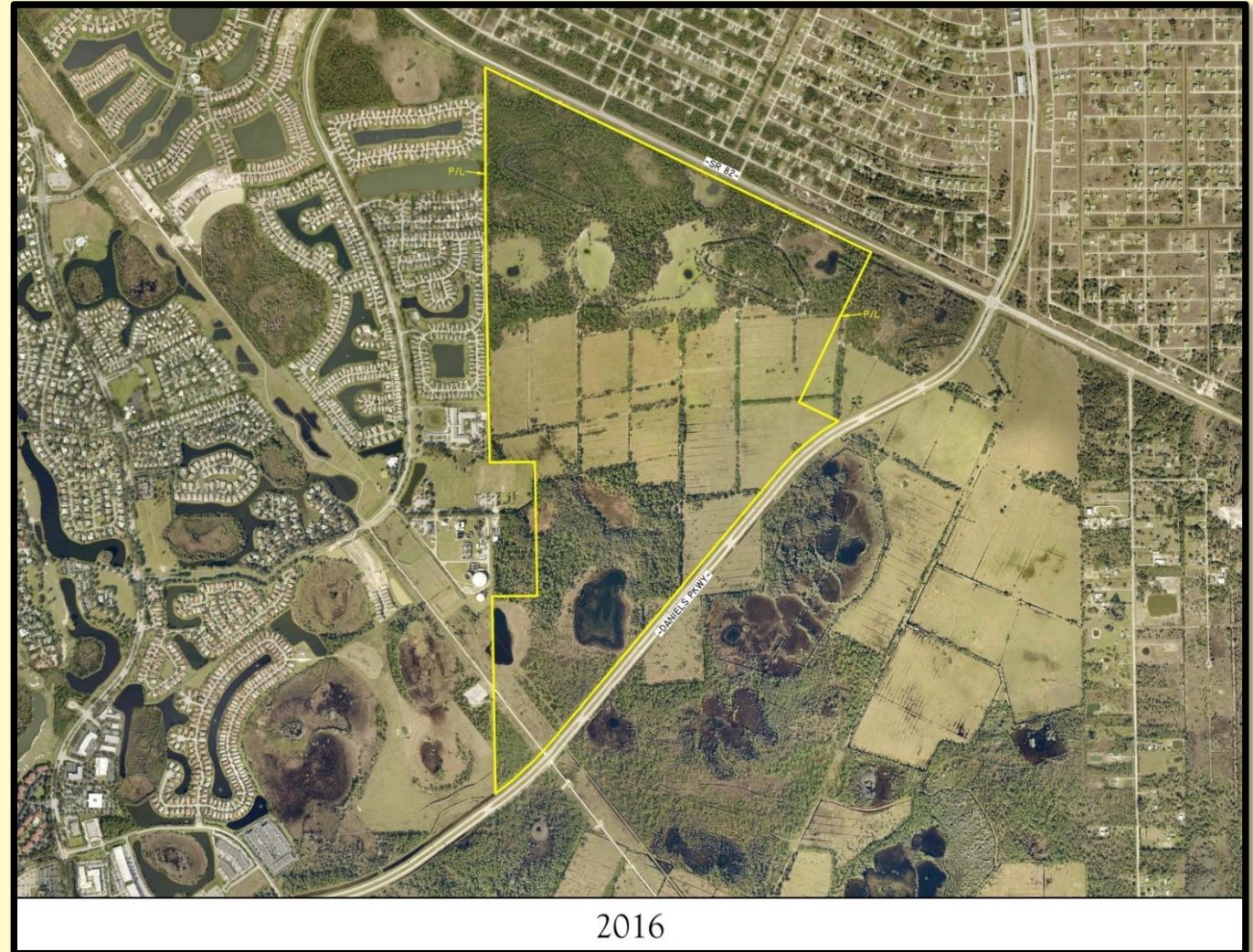
Historical Background

- By 1996, development of Gateway was well underway to the west



Existing Conditions

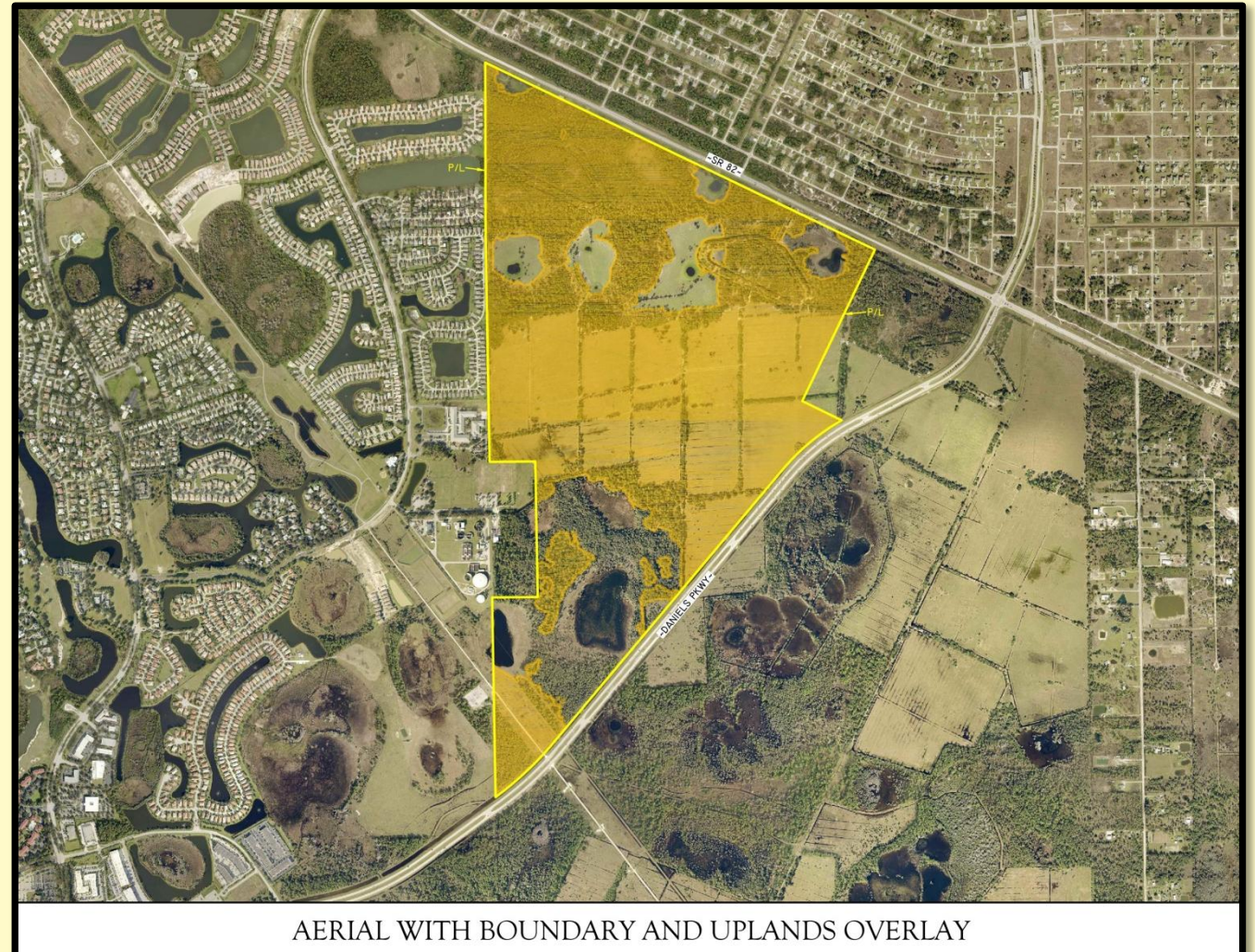
- Majority of the site is highly disturbed
- Cattle grazing activities still in place
- Dominant land use is agriculture
- Property contains a mixture of indigenous and non-indigenous upland and wetland habitat types



Existing Conditions

- 462± acre of uplands (Orange)
- Dominant upland habitats include:
 - Improved pasture (46%)*
 - Pine flatwoods (31%)
 - Disturbed lands (9%)*
 - Hardwood/conifer mixed (8%)

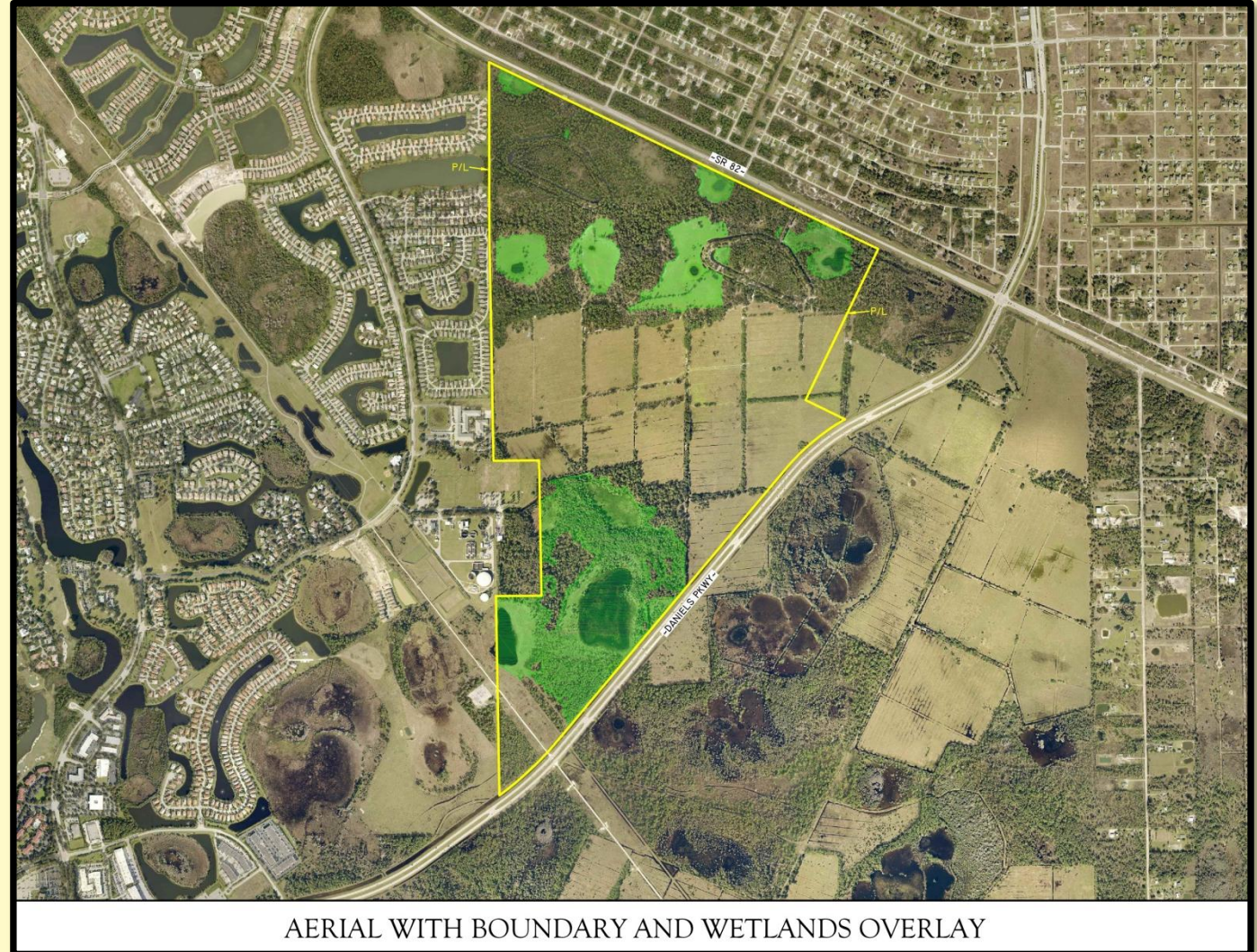
**Non-indigenous habitats*



AERIAL WITH BOUNDARY AND UPLANDS OVERLAY

Existing Conditions

- 149± acre of wetlands (Green)
- Wetland habitats include:
 - Low pasture (24%)*
 - Hydric pine (24%)
 - Freshwater marsh (22%)
 - Wet prairie (16%)
 - Melaleuca (9%)*
 - Wetland shrub (5%)
 - Disturbed land hydric (<1%)*
 - Mixed hardwoods (<1%)
- 84± acres of wetlands contain high levels of exotic coverage (>50%)
- *Non-indigenous habitats



AERIAL WITH BOUNDARY AND WETLANDS OVERLAY

Protected Species

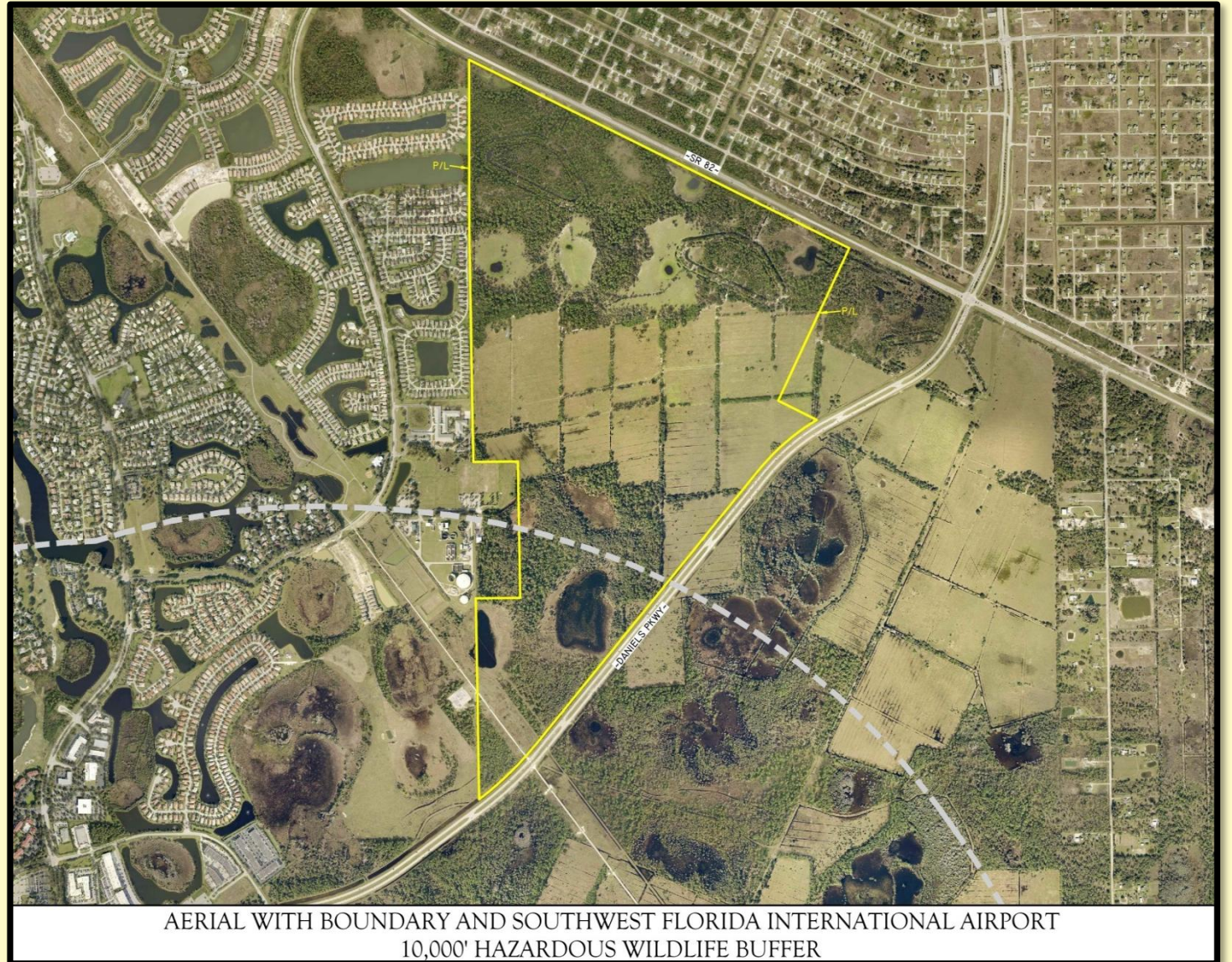
- PAI conducted a Lee County PSS in April 2016
- The following species were observed:
 - American alligator
 - Wood stork
 - Florida sandhill crane
 - Little blue heron
 - Snowy egret
 - Tri-colored heron
 - White Ibis
 - Big Cypress fox squirrel
- Protected species management plan will be prepared prior to DO approval



Bill Cox

SWFIA 10,000-foot Hazardous Wildlife Buffer

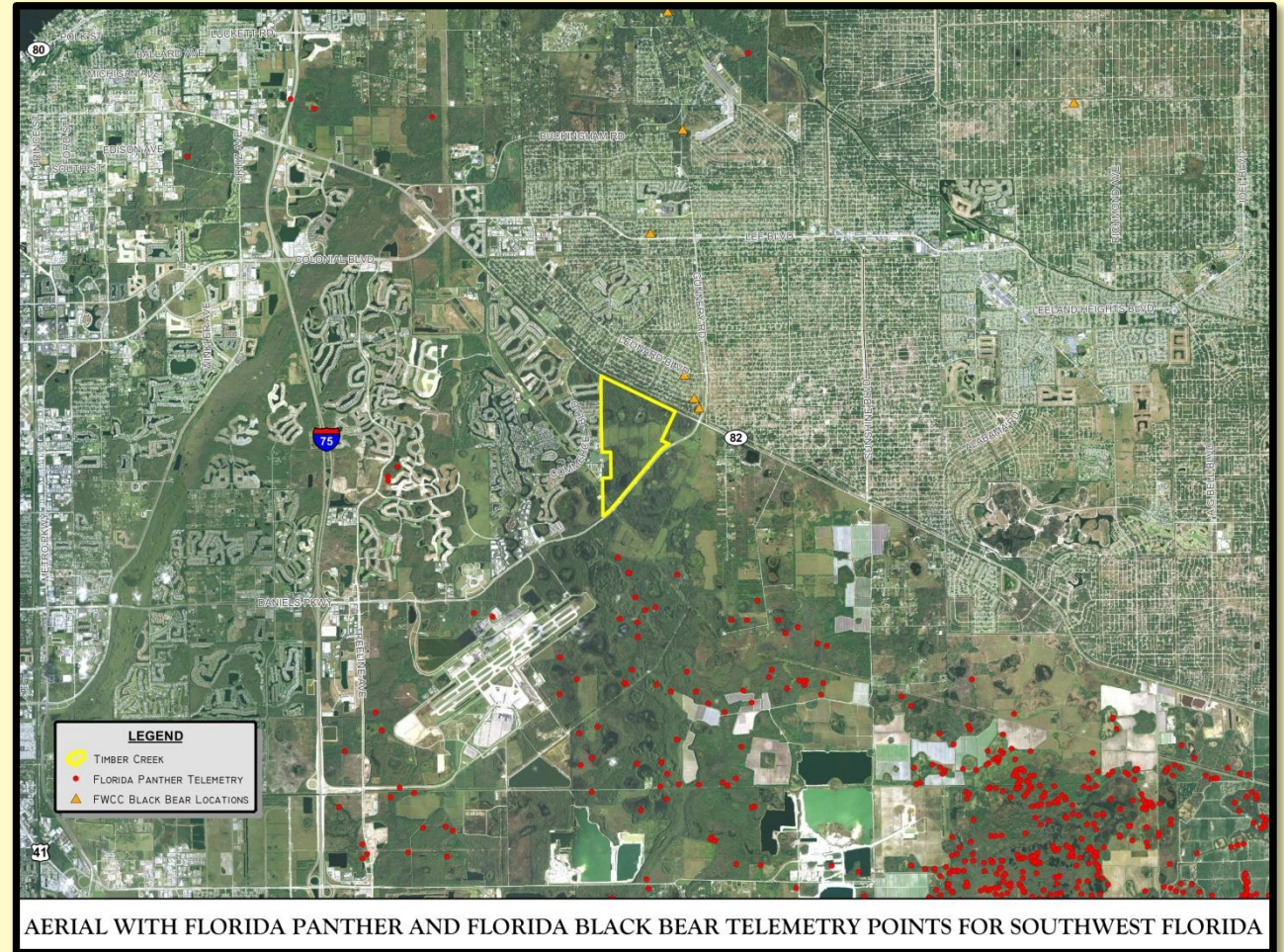
- Minimize wildlife attractants within buffer
- No creation of wetlands or lake littoral shelves within buffer



AERIAL WITH BOUNDARY AND SOUTHWEST FLORIDA INTERNATIONAL AIRPORT
10,000' HAZARDOUS WILDLIFE BUFFER

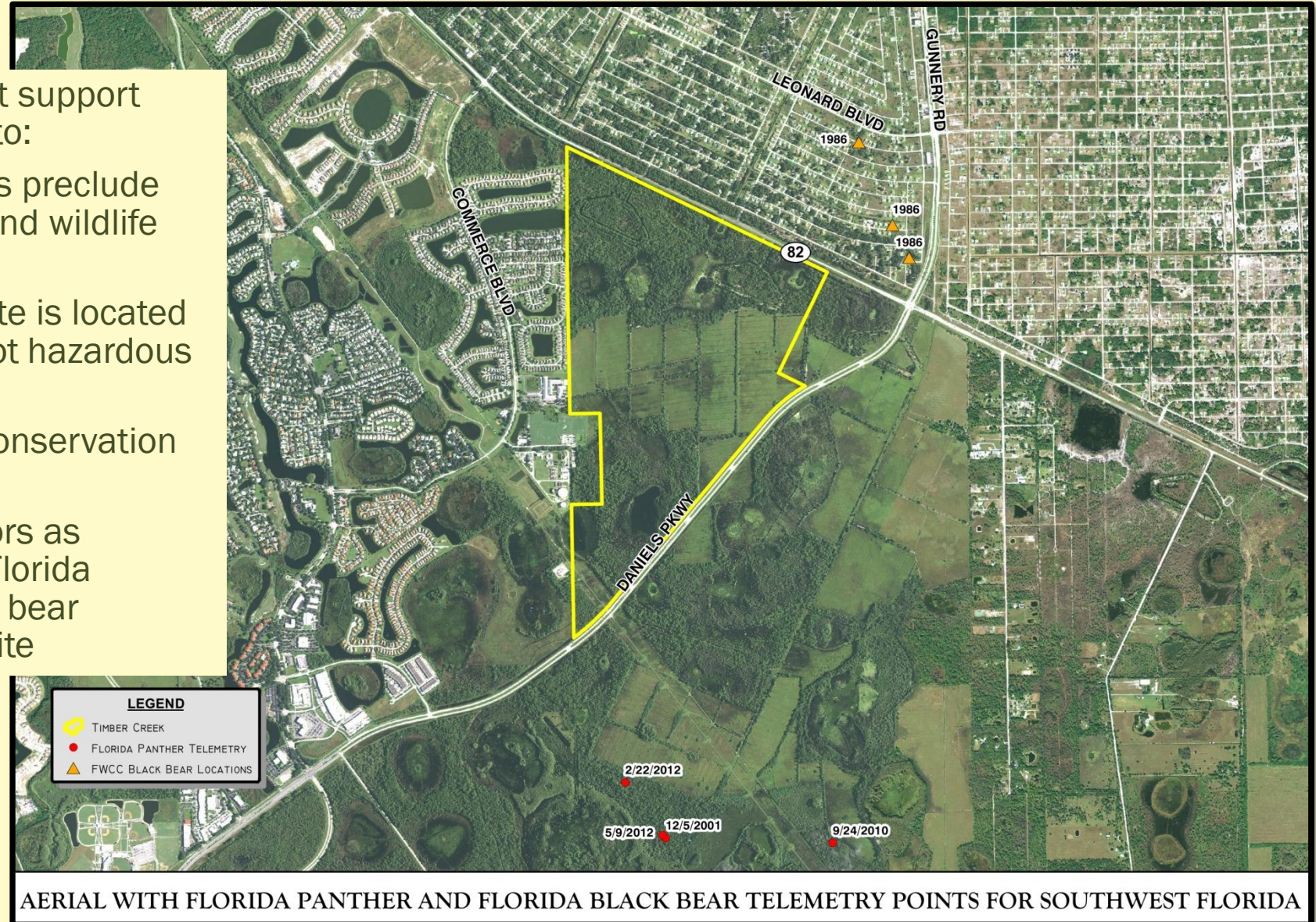
Policy 33.2.1

- Policy 33.2.1: promotes large-scale ecosystem integrity through protection and/or restoration lands that connect existing wildlife corridors and conservation areas



Policy 33.2.1

- The subject property cannot support intent of Policy 33.2.1 due to:
 - The surrounding land uses preclude ability to make preserve and wildlife connections
 - Southern portion of the site is located within SWFIA's 10,000-foot hazardous wildlife buffer
 - No adjacent large-scale conservation areas to connect
 - No existing wildlife corridors as evidenced by the lack of Florida panther and Florida black bear telemetry on the project site



Conclusion

Based on my review of historic aerials, existing site conditions, surrounding land uses, and available Florida panther and Florida black bear telemetry data, the subject property cannot support the intent of Policy 33.2.1. The information I presented supports the request to remove the subject property from the DR/GR due to a lack of a wildlife corridor. Therefore, the subject property would be more appropriately designated as Sub-Outlying Suburban per the proposed request.

It is my professional opinion that the data and analysis supports the proposed Comprehensive Plan changes and Map Amendments. The proposed changes meet the requirements of Florida Statutes Chapter 163, are consistent with the Lee Plan, Land Development Code, and the data and analysis demonstrate the proposed changes will not cause any significant harm to present and future public water resources.

Shane Johnson
Passarella & Associates

TRANSPORTATION ANALYSIS



Ted Treesh

Traffic

- Analysis Submitted concludes that:
 - *no modifications are necessary to the 2040 Long Range Transportation Plan*
 - *no modifications are necessary to the short-term 5-Year Capital Improvement Plan*
- 2040 analysis
 - *Several roadway segments are projected to operate below the minimum non-regulatory Level of Service standards before project trips are added*
 - *Amendment does not cause any additional roadway links to operate below minimum non-regulatory Level of Service standards*
- 5-year CIP analysis
 - *project will not cause any roadway links to operate below recommended minimum Level of Service standards*
- SR 82 programmed for widening adjacent to site starting in 2017
- **Transportation Mitigation will be provided through Road Impact Fees**

Conclusion

It is my professional opinion that the data and analysis supports the proposed Comprehensive Plan changes and Map Amendments. The proposed changes meet the requirements of Florida Statutes Chapter 163, are consistent with the Lee Plan and Land Development Code. The data analysis demonstrate the proposed changes will not cause any roadway links to operate below minimum recommended Level of Service standards.

Ted Treesh
TR Transportation

PLANNING ANALYSIS



Tina M. Ekblad MPA, AICP, LEED® AP

Lee Plan Background

Density Reduction/Groundwater Resource

Policy 1.4.5:

- Substantial recharge to aquifers
- Maintenance of surface and ground water levels at their historic levels.
- Agriculture, natural resource extraction and related facilities, conservation, public and private recreation facilities, and residential uses.

1. Property is separated from majority of the DR/GR
 - a. *Daniels Parkway*
 - b. *Berms and other improvements*
 - c. *Existing farm road on the property to the east.*
2. Improvements ensure water and wildlife do not freely flow from Timber Creek to the surrounding properties.
3. Property does not provide regional hydrological or wildlife connections southeast of Daniels Parkway.
4. Due to lack of connections and the inability of the property to meet the intent of the DR/GR FLU
 - a. *Requesting Sub-Outlying Suburban FLU*

Current Future Land Use - Not Appropriate

■ Lee Plan Map 8

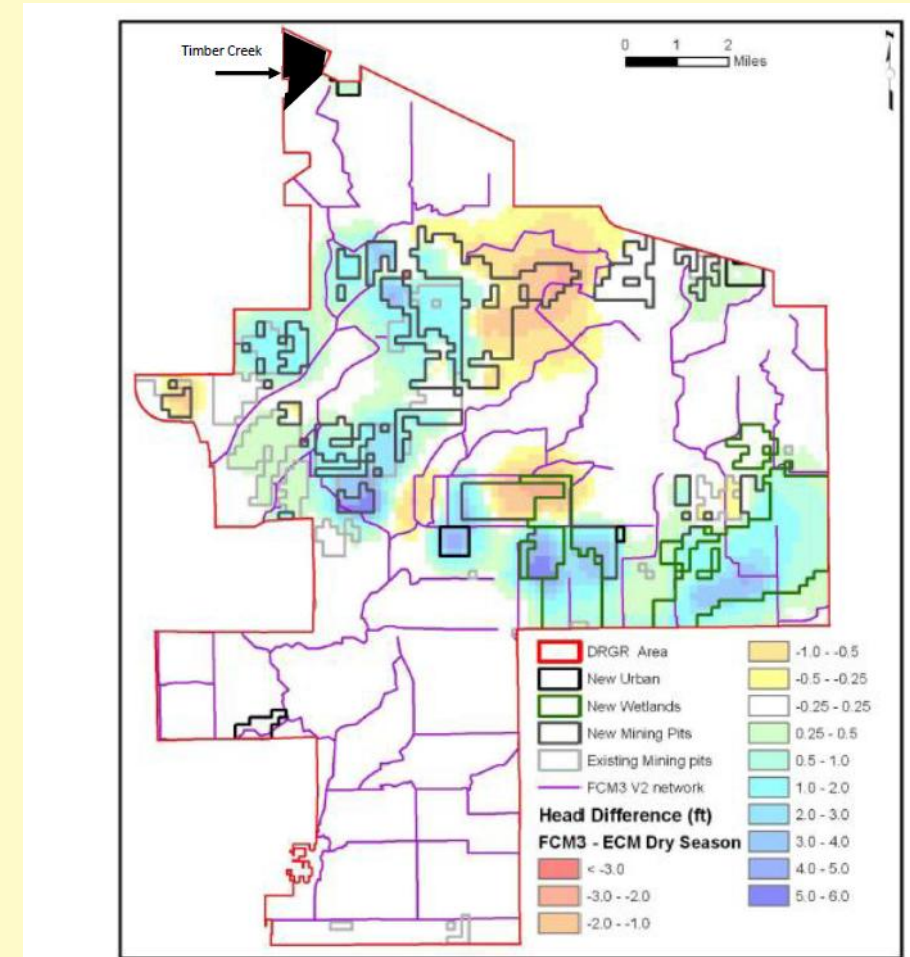
- Lee County Utilities appropriate locations for physical withdrawal of water
- Clustered locations of wells is almost 4 miles southeast and approximately 4.5 miles northeast from the property corners

■ Progressive Water Resources

- Property “exhibits substantially different hydrogeologic characteristics from the remainder of the DR/GR area.”
 - Property does not provide prime recharge
 - Thick clayey sediments exist rather than typical limestone layer

■ Characteristics of the subject property do not permit substantial recharge

■ Property does not and cannot meet the intent of the DR/GR and Southeast Lee Planning Community



Sub-Outlying Suburban

POLICY 1.1.11:

- Residential areas;
- Predominantly low-density development;
- infrastructure needed for higher density development is not planned or in place;
- Higher densities are incompatible with the surrounding area;
- one dwelling unit per acre (1 du/acre) to two dwelling units per acre (2 du/acre)
- Bonus densities are not allowed.

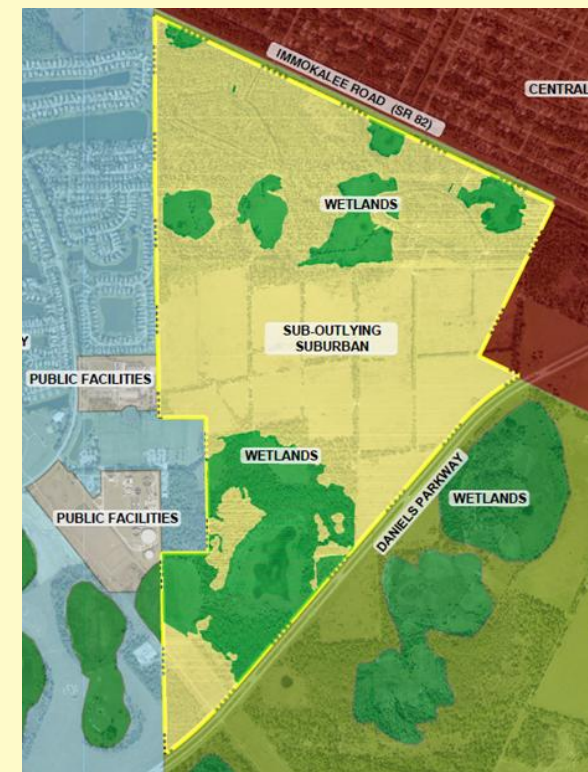
1. Developed location of the County
 - a. Established residential communities and some commercial development
2. Density Transition
 - a. 3 to 4 dwelling units per acre permitted to the North and West
 - b. Agricultural lands and large 2 to 5 acre lots permitted to the Southeast.
3. Future development clustered toward the northwest
 - a. Preserving existing wetlands and indigenous habitat
4. Sub-Outlying Suburban provides for lower densities
 1. appropriate for the site's transitional location
 2. promotes an infill use of the subject property
 3. Consistent with boundaries of two intersecting arterial roadways adjacent to existing suburban and urban residential communities.
5. Sub-Outlying Suburban FLU accurately depicts the conditions and location of the subject property.

Groundwater

- Policy 2.4.2: Changes to the FLU Map in the DR/GR will analyze the proposed land use and impact to present and future water resources
 - Policy 2.4.3: FLU Map Amendments in the DR/GR must analyze the availability of irrigation and domestic water sources, present data and analysis of no harm to present and future water resources
 - Policy 60.1.1: Develop surface water management systems to protect or enhance the groundwater table
 - Objective 60.5: Incorporate green infrastructure into the surface water management system.
 - Goal 61: Protect water resources through the application of innovative and sound methods of surface water management.
1. Modeling of proposed future development demonstrated no impacts to adjacent properties, existing users or water resources
 2. Environmental Resource Permit concurrently sought from South Florida Water Management District
 3. A centrally controlled integrated ground and surface water irrigation system will be utilized
 4. Centralized stormwater system, will help increase opportunities for recharge
 5. These practices promote the intent of Goal 61, Objective 60.5 and are consistent with Policies 2.4.2 & 60.1.1.

Wildlife

- GOAL 107: Maintain and enhance native habitats, species diversity, water quality, and natural surface water characteristics.
- OBJECTIVE 107.3: Maintain and enhance wildlife diversity and distribution within Lee County for a balanced ecological system.
- POLICY 107.3.1: Encourage upland preservation around preserved wetlands to provide habitat diversity and promote wildlife conservation.
- OBJECTIVE 107.4: Protect habitats of endangered and threatened species to maintain or enhance existing population numbers and distributions of listed species.
- GOAL 114: Maintain and enforce development regulations that is cost-effective, complements federal and state permitting processes and protects wetland systems.



1. $\pm 50\%$ of the property impacted by existing agricultural operations and former target range
2. Remaining habitat is disturbed native wetland systems, non-native wetland habitat and wetlands with high levels of exotic infestation.
3. No rare or unique uplands were identified

Goal 2 Growth Management

- Objective 2.1 and implementing policies promote contiguous and compact growth patterns ensure development in close proximity to urban services and existing communities
- Objective 2.2 and its implementing policies directs new growth to areas where adequate public facilities exist to support compact and contiguous growth patterns.



1. Sub-Outlying Suburban FLU
 - a. Density consistent with the existing surrounding developments
 - b. Promotes a transition between communities and the agricultural lands
 - c. within the service area for urban services.
 - d. Lee County Utility service occurs across a portion of the property.

Urban Services

■ Utilities

- *Exists adjacent to and across a portion of the property*
- *Amendment to Map 6 and 7 to extend public utilities to entire property*
- *Capacity within Lee County Utilities to serve future development*

■ Solid Waste

- *Capacity within Lee County Waste to Energy Facility*

■ Parks – Regional and Community

- *Capacity within existing and planned parks to serve future development*

■ Public Schools

- *Capacity within the School District to serve future development*

■ Public Safety

- *Property is within the service area for Lee County Emergency Medical Services, South Trail and Lehigh Acres Fire District, and Lee County Sheriff*

Goal 5: Residential Land Uses

- Policy 5.1.2: Prohibit residential development where physical constraints or hazards exist. Includes environmental limitations and aircraft noise
- Policy 5.1.5 Protect existing and future residential areas from encroachment of uses that are potentially destructive to the character and integrity of the residential environment



1. Retaining existing wetlands and native habitat
2. Clustering development tracks outside noise zone on southern tip of property
3. Pattern of development and density consistent with transitional nature of the property

Conclusions

- Proposed amendments are consistent with provisions of Chapter 163.3177, FS
- The data provided, and the methodology undertaken for the collection and analysis of that data, is consistent with generally recognized professional standards consistent with those recognized in each of the disciplines involved.
- Proposed amendments are consistent with the existing Goals, Objectives, and Policies of the Lee Plan
- Proposed amendments do not create an internal inconsistency with the existing Goals, Objectives, and Policies of the Lee Plan
- Both the needs of the County as well as the location of the property have been considered in the review of the proposed amendment; the amendment represents the correct application of the Lee Plan for the unique circumstances of the property.
- It is the professional opinion of the experts involved in the preparation of this request, as well as with the County's professional Staff, that it should be transmitted

Professional Opinion

It is my professional opinion that the Timber Creek FLU Amendments have made proper applications, met all of the applicable standards, has demonstrated consistency with the Lee Plan, the provisions found in Chapter 163.3177, F. S., and generally accepted planning principals. It has provided the necessary record that entitles it to a recommendation in support of transmittal to the Florida Department of Economic Opportunity, and approval by the Lee County Board of Commissioners for a Comprehensive Plan Amendment to Future Land Use Map and Table 1(b) as requested.

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