

1400 Colonial Blvd., Suite 1
Fort Myers, FL 33907



P: 239.938.1813 | F: 239.938.1817
www.swftrpc.org

July 18, 2017

Ms. Mikki Rozdolski
Planning Manager
Department of Community Development
P.O. Box 398
Fort Myers, Florida 33902-0398

Re: Lee County CPA2016-00013 / DEO 17-4DRI

Dear Ms. Rozdolski:

The staff of the Southwest Florida Regional Planning Council has reviewed the proposed amendment (DEO 17-4DRI) to the Lee County Comprehensive Plan. The review was performed according to the requirements of the Local Government Comprehensive Planning and Land Development Regulation Act.

The Council will review the proposed amendment and the staff recommendations at its September 21, 2017 meeting. Council staff is recommending that the request be found regionally significant and conditionally consistent with the SRPP. As previously stated in our review of the Babcock Ranch Clearance Letter for the Lee County portion, staff recommended "the project not go through the state coordinated review process instead it must be reviewed as a substantial deviation to the Charlotte County Babcock Ranch MDO DRI.

A copy of the official staff report explaining the Council staff's recommendation is attached. If Council action differs from the staff recommendation, we will notify you.

Sincerely,
Southwest Florida Regional Planning Council

A handwritten signature in blue ink that reads 'Margaret Wuerstle'. The signature is fluid and cursive.

Margaret Wuerstle, AICP
Executive Director

MW/DEC
Attachment

Cc: Mr. Eubanks, Administrator, Plan Review and Processing, Department of Economic Development



**LOCAL GOVERNMENT COMPREHENSIVE PLAN AMENDMENTS
LEE COUNTY**

The Council staff has reviewed the proposed evaluation and appraisal based amendments to the Lee County Comprehensive Plan (DEO 17-4DRI). These amendments were developed under the Local Government Comprehensive Planning and Land Development Regulation Act. A synopsis of the requirements of the Act and Council responsibilities is provided as Attachment I. Comments are provided in Attachment II. Site location maps can be reviewed in Attachment III.

Staff review of the proposed amendments was based on whether they were likely to be of regional concern. This was determined through assessment of the following factors:

1. Location--in or near a regional resource or regional activity center, such that it impacts the regional resource or facility; on or within one mile of a county boundary; generally applied to sites of five acres or more; size alone is not necessarily a determinant of regional significance;
2. Magnitude--equal to or greater than the threshold for a Development of Regional Impact of the same type (a DRI-related amendment is considered regionally significant); and
3. Character--of a unique type or use, a use of regional significance, or a change in the local comprehensive plan that could be applied throughout the local jurisdiction; updates, editorial revisions, etc. are not regionally significant.

A summary of the results of the review follows:

Factors of Regional Significance

<u>Proposed</u> <u>Amendment</u>	<u>Location</u>	<u>Magnitude</u>	<u>Character</u>	<u>Consistent</u>
DEO 17-4DRI	Yes	No	No	(1) Regionally significant (2) Conditionally consistent with SRPP

RECOMMENDED ACTION:

Approve staff comments. Authorize staff to forward comments to the Department of Economic Opportunity and Lee County

07/2017

COMMUNITY PLANNING ACT

Local Government Comprehensive Plans

The Act requires each municipal and county government to prepare a comprehensive plan that must include at least the following nine elements:

1. Future Land Use Element;
2. Traffic Circulation Element;
A local government with all or part of its jurisdiction within the urbanized area of a Metropolitan Planning Organization shall prepare and adopt a transportation element to replace the traffic circulation; mass transit; and ports, aviation, and related facilities elements. [9J-5.019(1), FAC]
3. General Sanitary Sewer, Solid Waste, Drainage, and Potable Water and Natural Groundwater Aquifer Recharge Element;
4. Conservation Element;
5. Recreation and Open Space Element;
6. Housing Element;
7. Coastal Management Element for coastal jurisdictions;
8. Intergovernmental Coordination Element; and
9. Capital Improvements Element.

The local government may add optional elements (e. g., community design, redevelopment, safety, historical and scenic preservation, and economic).

All local governments in Southwest Florida have adopted revised plans:

Charlotte County, Punta Gorda

Collier County, Everglades City, Marco Island, Naples

Glades County, Moore Haven

Hendry County, Clewiston, LaBelle

Lee County, Bonita Springs, Cape Coral, Fort Myers, Fort Myers Beach, Sanibel

Sarasota County, Longboat Key, North Port, Sarasota, Venice

COMPREHENSIVE PLAN AMENDMENTS

A local government may amend its plan at any time during the calendar year. Six copies of the amendment are sent to the Department of Economic Opportunity (DEO) for review. A copy is also sent to the Regional Planning Council, the Water Management District, the Florida Department of Transportation, and the Florida Department of Environmental Protection.

The proposed amendments will be reviewed by DEO in two situations. In the first, there must be a written request to DEO. The request for review must be received within forty-five days after transmittal of the proposed amendment. Reviews can be requested by one of the following:

- the local government that transmits the amendment,
- the regional planning council, or
- an affected person.

In the second situation, DEO can decide to review the proposed amendment without a request. In that case, DEO must give notice within thirty days of transmittal.

Within five working days after deciding to conduct a review, DEO may forward copies to various reviewing agencies, including the Regional Planning Council.

Regional Planning Council Review

The Regional Planning Council must submit its comments in writing within thirty days of receipt of the proposed amendment from DEO. It must specify any objections and may make recommendations for changes. The review of the proposed amendment by the Regional Planning Council must be limited to "effects on regional resources or facilities identified in the Strategic Regional Policy Plan and extra-jurisdictional impacts which would be inconsistent with the comprehensive plan of the affected local government".

After receipt of comments from the Regional Planning Council and other reviewing agencies, DEO has thirty days to conduct its own review and determine compliance with state law. Within that thirty-day period, DEO transmits its written comments to the local government.

NOTE: THE ABOVE IS A SIMPLIFIED VERSION OF THE LAW. REFER TO THE STATUTE (CH. 163, FS) FOR DETAILS.

LEE COUNTY COMPREHENSIVE PLAN AMENDMENT (DEO 17-4DRI)

RECEIVED: JUNE 13, 2017

Summary of Proposed Amendment

Lee County DEO 17-4DRI (Babcock) proposes both map amendments and text amendments:

Map Amendments: Amend Map 1, the Future Land Use Map, to change the future land use category of the property from Density Reduction/Groundwater Resource (DR/GR) and Wetlands to New Community and Wetlands; and Map 4, the Private Recreational Facilities Overlay, to remove the subject property from the overlay.

Text Amendments: Amend Objective 1.6, Goal 35, Policy 1.6.1, and Tables 1(a) and 1(b) to allow a maximum density of 1 dwelling unit per 2.5 acres, nonresidential uses, and provide requirements for clustered development, environmental enhancements and permanent conservation.

The requested amendments would allow a low density mixed-use development with a maximum of one dwelling unit per 2.5 acres (1,662 dwelling units) and commercial at a 0.15 floor area ratio (1,170,000 square feet). The development will be clustered onto 1,662 acres, approximately 40% of the subject property. The remaining land, 2,494 acres or 60% of the property, will be for conservation and restored. This conservation and restoration will have positive impacts on water quality, wildlife, downstream flooding, and groundwater resources. In addition, it will add to the already extensive conservation land within Northeast Lee County.

The subject property is approximately 4,157 acres and is located within the Babcock Ranch DRI. To the north, the property abuts the Lee/Charlotte County line. To the east are 20/20 Conservation Lands, Telegraph Creek Preserve and Bob Janes Preserve. To the west, the property abuts State Road 31 (SR 31). Across SR 31 are single family homes and agricultural activities on parcels ranging in size from one acre to approximately 240 acres. To the south is State Road 78 (SR 78), North River Road. There are some single family homes and agricultural activities on parcels ranging in size from approximately 1.4 acres to approximately 400 acres immediately abutting the subject property north of North River Road. South of North River Road are properties within the Rural future land use category and AG-2 zoning district that range in size from approximately 5 acres to over 300 acres.

Regional and Extra-Jurisdictional Impacts

The Florida Department of Transportation (FDOT) provided comments that are attached in this report. FDOT states that their comments, if not addressed, may result in a challenge to an adopted amendment. FDOT Comment 1 explains that the required short term (5 year) traffic analysis has not been submitted in the transmittal. FDOT Comment 2 points out that the traffic study does not adequately reflect future land uses and programmed future improvements. FDOT Comment 3 recommends that an intersection traffic analysis be included for the proposal. FDOT prepared a traffic study memorandum which is also attached.

Given the comments from FDOT, Council staff finds this amendment is regionally significant in regards to location, due to the potential impacts on state transportation systems. The amendment is conditionally consistent with the SRPP if the transportation issues are resolved. As previously stated in our review of the Babcock Ranch Clearance Letter for the Lee County portion, we recommended “the project not go through the state coordinated review process instead it must be reviewed as a substantial deviation to the Charlotte County Babcock Ranch MDO DRI. The Lee County Babcock Ranch must be reviewed cumulatively for regional impacts as one project with Charlotte County Babcock Ranch. This cumulative analysis is particularly necessary for the transportation impacts to be reviewed as one development project for mitigation on State Road 31 and other Lee County Roads that receive the majority of traffic from the total Charlotte/Lee Babcock Ranch. The best review process to address cumulative impacts and for “shifting of intensities already approved immediately north of county line by Charlotte County” is for the total Babcock Ranch to submit a Master Application for Development Approval in Lee County with incremental applications as the development in Lee become solidified when actual development is ready to be developed”.

Conclusion

Council staff finds this amendment regionally significant in regards to location and conditionally consistent with the SRPP if the transportation issues are resolved. Council staff additionally recommends that this project be reviewed as an AMDA DRI.

Recommended Action

Approve staff comments. Authorize staff to forward comments to the Department of Economic Opportunity and Lee County.



Florida Department of Transportation

RICK SCOTT
GOVERNOR

10041 Daniels Parkway
Fort Myers, FL 33913

MIKE DEW
SECRETARY

July 14, 2017

Mr. Ray Eubanks
Plan Processing Administrator
Department of Economic Opportunity
Caldwell Building
107 East Madison Street, MSC 160
Tallahassee, FL 32399

RE: Lee County 17-4DRI Proposed Comprehensive Plan Amendment (Babcock) State Coordinated Review – FDOT Review Comments and Recommendations

Dear Mr. Eubanks:

The Florida Department of Transportation (FDOT), District One has reviewed the Lee County 17-4 DRI proposed Comprehensive Plan Amendment (CPA), locally named CPA 2016-00013 (Babcock), pursuant to the state coordinated review (SCR) process set forth in section 163.3184 (4), Florida Statutes (F.S.). The following is a summary of the current Lee County 17-4 DRI proposed CPA along with the Department's comments and recommendations related to important state transportation resources and facilities.

CPA OVERVIEW

The CPA proposes to amend the Lee County Comprehensive Plan Future Land Use (FLU) Map and FLU Element to allow a low density, mixed-use development on 4,157± acres of land located directly south of the Lee/Charlotte County Line and east of SR 31, in Lee County, FL. (*reference Figure 1*).

Figure 1: Location and Impacted Roadway Map



FLU Map Amendments

- Amend the FLU Map (Map 1) to change the FLU category of the property from Density Reduction/Groundwater Resource (DR/GR) and Wetlands to New Community and Wetlands
- Amend the Private Recreational Facilities Overlay (Map 4) to remove the subject property from the overlay

FLU ELEMENT TEXT AMENDMENTS

Amend Objectives 1.6, 35.3, 35.4 and 35.11 (new Objective and Policies 35.11.1, 35.11.2 and 35.11.3), Policies 1.6.1 and 35.3.4 (new Policy), Goal 35, Policy 114.1.1, and Tables 1(a) and 1(b) to allow a maximum density of 1 dwelling unit per 2.5 acres (1,662 dwelling units), nonresidential uses at a 0.15 floor area ratio (FAR) (1,170,000 square feet) and provide requirements for clustered development, environmental enhancements and permanent conservation.

The following summarizes the major highlights of the proposed text amendments:

- Objective 1.6 and Policy 1.6.1 provide a maximum density of 1 DU per 2.5 acres of uplands for property outside the Gateway/Airport Planning Community, establish a minimum size requirement of 2,000 acres for property to be designated New Community and provide a cross reference to development parameters for property designated New Community within the North Olga Community Planning area
- Goal 35, Objectives 35.3 and 35.4 and new Policy 35.3.4 reference the uses allowed under new Objective 35.11
- New Objective 35.11 establishes the New Community FLU category within the North Olga Community as follows:
 - New Policy 35.11.1 specifies the maximum density of one DU per 2.5 acres
 - New Policy 35.11.2 specifies the maximum permitted FAR of 0.15 for nonresidential uses
 - New Policy 35.11.3 specifies the conditions of a Planned Development Rezoning regarding Environmental Enhancements, Water Quality and Hydrological Enhancements, Infrastructure Enhancements and Community Character
- Policy 114.1.1 allows owners of wetlands adjacent to the New Community FLU category to transfer densities to developable contiguous uplands per Footnotes 9b and 9c of Table 1(a), Summary of Residential Densities
- Table 1(a), Summary of Residential Densities, limits residential densities on the New Community FLU category within the North Olga Community to one DU per 2.5 acres
- Table 1(b), Year 2030 Allocations, revises the allocations of development permitted within each FLU category to reflect the Babcock development in Lee County

FDOT COMMENTS

FDOT is responsible for preserving and maintaining the functional operation of the State Highway System (SHS) and the focus the review is related to major transportation issues that would create an adverse impact to transportation facilities of state importance and identification of measures to eliminate, reduce, or mitigate such adverse impacts in accordance with sections 163.3161(3) and 163.3184(4), F.S. Important SHS facilities include the Strategic Intermodal System (SIS) and certain significant regional resources and corridors as identified in the Lee County Metropolitan Planning Organization (MPO) 2040 Long Range Transportation Plan (LRTP).

Based on our review FDOT has three main comments regarding the proposed amendments; 5-year planning horizon, data input and analysis and transportation methodology - intersections. Measures recommended by the Department to eliminate, reduce, or mitigate the impact of the proposed amendment are also provided. Agency comments, if not addressed, may result in a challenge to an adopted amendment.

FDOT Comment #1 – Planning Horizon:

Pursuant to 163.3177(5)(a), F.S., any comprehensive plan amendment traffic analysis is required to cover at least two planning periods; short-term (5-Year Capital Improvements Element) and long-term planning horizons to determine the effect of the land use change. The statute also states that additional planning periods for land use amendments shall be permissible and accepted as part of the planning process.

FDOT finds the transmitted CPA package is not consistent with section 163.3177(5)(a), F.S. because the submitted amendment only includes analysis of one planning period (the long-term (2040) conditions). Since the required short-term 5-year planning period traffic analysis is not included, the effect of the proposed development on nearby SHS facilities, including SR 31, SR 78, SR 80, and I-75 cannot be fully evaluated. This creates concern the proposed development may adversely impact important state resources within the short-term planning horizon as well as at build-out (2026).

Resolution:

FDOT recommends that the short-term (5-year) traffic analysis required pursuant to 163.3177(5)(a) be provided with the CPA package and build-out (2026) analysis in order to identify impacts of the proposed development to the SHS. Significant and adverse impacts should include appropriate mitigation measures along with a proportionate share calculation for each solution.

FDOT Comment #2 – Data, Input and Analysis:

FDOT finds the transmitted CPA package is not consistent with sections 163.3177(3)(a)3 and 163.3177(6)(a)8, F.S. The traffic study supporting this application does not adequately reflect future land uses and programmed future improvements. As an

example, the revised development program (emailed to FDOT on May 26, 2017) no longer includes 42 amateur sports fields and shows that hotel rooms will be reduced from 1,500 to 600 rooms. In addition, the widening of SR 31 from SR 80 to SR 78 included in the Lee County MPO's Long Range Transportation Plan Cost Feasible Plan was not factored into the study.

In October, 2016 Lee County requested a courtesy review of the draft CPA and original CPA traffic study (dated September 27, 2016) from FDOT. As part of this review several inconsistencies between this CPA package, the original report and the revised CPA application, including the accompanying staff report and traffic study, were identified. These inconsistencies are summarized in the following Table 1:

Table 1: Development Program Comparison

Category	Development Program (10/14/2016)	Revised Development Program		
		Application (4/27/2017)	Staff Report (6/7/2017)	Traffic Analysis (12/5/2016)
Residential Dwelling Units (DUs)	1,680	1,630	1,662	1,630
Non-Residential Square Feet (SF)	1,220,000	1,170,000	1,170,000	1,170,000
Hotel Rooms	1,500	1,500	N/A ³	1,500
Amateur Sports Fields	42	42	0	42
Acres	4,204.7	4,157.2	4,157.2	4,200
Land Use	Includes an Overlay ¹ modifying the densities and intensities allowed under the DR/GR ² FLU Category	Change from DR/ GR ² and Wetlands FLU to New Community and Wetlands	Change from DR/ GR ² and Wetlands FLU to New Community and Wetlands	Includes an Overlay ¹ modifying the densities and intensities allowed under the DR/GR ² FLU Category
FAR for Nonresidential	0.25	0.25	0.15	N/A ³

- 1) Environmental Enhancement & Economic Development Overlay specific to the North Olga Community.
- 2) DR/GR = Density Reduction/Groundwater (DR/GR).
- 3) Not Available – Not specified in the revised application

Resolution:

FDOT prepared a traffic study memorandum (enclosed) which details the noted deficiencies in data inputs and analysis. FDOT staff is available to discuss these technical issues with the applicant so that we can adequately determine the extent of the proposed development program's short and long term impacts and ensure that the future land use map is based on an accurate analysis of the availability of facilities and services, pursuant to 163.3177(3)(a)3, and 163.3177(6)(a)8, F.S.

FDOT Comment #3 – Intersection Methodology:

FDOT provided comments and recommendations on September 29, 2016 for the transportation methodology to be utilized in analysis of the proposed development and its effect on the SHS roadway network. One of the recommendations was to include intersection analysis in the CPA transportation analysis. On October 28, 2016, FDOT again recommended intersection analysis be included as part of the CPA transportation analysis a part of the courtesy review and technical assistance provided to Lee County. To date, intersection traffic analyses for the CPA have not been provided by the applicant.

Resolution:

To ensure safe and efficient access to the SHS, FDOT recommends intersection analysis be included for the short-term (2021) and build-out (2026) horizons as part of the study. Significant and adverse impacts should include appropriate mitigation measures along with a proportionate share calculation for each solution.

- a. Include all project entrances along SR 31 (both for BRC DRI and Babcock CPA) in the intersection analysis along with a map showing all project entrances along SR 31
- b. Intersection turning movement counts (TMCs) utilized for this study should be no more than one-year old
- c. All signalized and major un-signalized intersections (including SR 31 @ SR 80 in Lee County and SR 31 @ CR 74 in Charlotte County) on significant roadways should be included in the intersection analysis
- d. Utilize a minimum 2% heavy vehicle percentage for analysis of future traffic conditions even if existing traffic count data shows heavy vehicle percentages of less than 2%
- e. Provide a clear and precise explanation of the methodology to be used in identifying adversities and proposed remedy mitigation along signalized and un-signalized study intersections in the CPA Transportation Methodology. This methodology should include the following:
 - Intersections that are anticipated to operate overall at, or below, the adopted LOS performance standard
 - Intersection movements and approaches that are anticipated to operate at a v/c ratio > 1.0 or LOS E or worse
- f. Include the I-75 @ SR 78/Bayshore Road interchange and conduct a queue analysis for all intersection movements operating at LOS E or F in both short-term (2021) and build out (2026) analyses to confirm that blockage does not occur and to identify any improvements needed to accommodate queued vehicles. Please

base all storage length calculations on FDOT Plans Preparation Manual (PPM) procedures

FDOT District One staff will continue to work with Lee County staff and the applicant to address our comments and ensure impacts to the SHS and SIS facilities of state importance are adequately mitigated prior to submittal of the final amendment package. Please contact Lawrence Massey at (239) 225-1980 or Sarah Catala at (239) 225-1981 with any questions or concerns.

Sincerely,



Laura Herrscher
Intermodal Systems Development Administrator

LH:sc

Enclosure

C: LK Nandam, P.E., Florida Department of Transportation
Steve Walls, Florida Department of Transportation
Lawrence Massey, Florida Department of Transportation
Sarah Catala, Florida Department of Transportation
Richard Shine, Esq., Florida Department of Transportation
Carmen Monroy, Florida Department of Transportation
Dana Reiding, Florida Department of Transportation
Andy Getch, P.E., Lee County Department of Community Development
David Loveland, AICP, Lee County Department of Community Development
Margaret Wuerstle, Southwest Florida Regional Planning Council
Ray Eubanks, Florida Department of Economic Opportunity
Brenda Winningham, Florida Department of Economic Opportunity
Gary Nelson, Babcock Property Holdings, LLC



Florida Department of Transportation

RICK SCOTT
GOVERNOR

10041 Daniels Parkway
Fort Myers, FL 33913

MIKE DEW
SECRETARY

July 14, 2017

Mr. Ray Eubanks
Plan Processing Administrator
Department of Economic Opportunity
Caldwell Building
107 East Madison Street, MSC 160
Tallahassee, FL 32399

**RE: Lee County 17-4DRI Proposed Comprehensive Plan Amendment (Babcock)
State Coordinated Review – Traffic Study Memorandum**

Dear Mr. Eubanks:

The purpose of this memorandum is to inform the Department of Economic Opportunity (DEO) of the noted deficiencies / inconsistencies in the Traffic Study dated December 5, 2016 (Exhibit IV. B.1, Traffic Circulation Analysis), included as part of the Lee County 17-4DRI Proposed CPA (Babcock) data, input and analysis. These deficiencies / inconsistencies include the following:

1. There are inconsistent development program references throughout the CPA package. Please clarify the proposed development program throughout the amendment package.
2. Lee County MPO amended their Long Range Transportation Plan Cost Feasible Plan in January 2017 to include widening of SR 31 from SR 80 to SR 78 as a Private/Grant Funded Project. This improvement is not included in the sub-area validated FDOT/MPO District 1 Regional Planning Model (D1RPM_V1.02_Babcock) used in the CPA Long Range 20-Year Horizon (2040) traffic analysis. Please update the D1RPM_V1.02_Babcock to include four lanes along SR 31 from SR 80 to SR 78.
3. Please remove discussions related to Special Generators and Baseball Complex since the Baseball Complex is no longer applicable¹. Please remove Traffic Analysis Zone (TAZ) #3113 and the socio-economic data associated with the previously proposed Baseball Complex. Also, please update the socio-economic data to reflect the reduction of hotel rooms from 1,500 to 600¹.

¹ During the SR 31 PD&E Project Traffic teleconference call on May 26, 2017, the applicant stated that the revised development program (emailed to FDOT on May 26, 2017) no longer includes the 42 amateur sports fields, and that the hotel rooms would be reduced from 1,500 to 600 rooms.

4. Please rerun the D1RPM_V1.02_Babcock with the recommended revisions identified above, and revise the Long Range 20-Year Horizon (2040) traffic analysis accordingly.
5. The analysis included in the traffic study is inconsistent with the currently proposed amendment to Map 4 (Private Recreational Facilities Overlay) because it includes the previously proposed 42 amateur sports fields, which have since been removed from the overlay². Please clarify this inconsistency and revise the analysis as appropriate.
6. The following is in reference to the calculations used in determining the number of residential units and the square feet of non-residential land use.
 - a. Please clarify the number of residential DUs being proposed, and provide a breakdown showing how the 1,662 residential DUs were calculated.

The proposed 1,662 DUs appear to be based on the entire 4,157± acre site, calculated at one DU per 2.5 acres. Per the CPA Application (pdf page 44), the site consists of 3,427.8 acres of uplands, 729.4 acres of wetlands and surface water (671.8 acres of wetlands and 57.6 acres of total surface waters). Based on these acreages, the Department calculates the total number of residential units as follows:

 - The 3,427.8 acres of uplands at one DU per 2.5 acres yields 1,371 DUs, and the 729.4 acres of wetlands at one DU per 20 acres (FLU Element Policy 1.5.1) yields 36 DUs, resulting in a total of approximately 1,407 DUs; which is less than the 1,662 DUs described in the Project Summary.
 - b. Please provide a breakdown showing how the 1,170,000 square feet of commercial uses were calculated based on the 0.15 FAR (see pdf pages 4 and 44 of the CPA package).
7. Policy 114.1.1 references Footnotes 9b and 9c of Table 1(a), Summary of Residential Densities. Please verify the Footnote references as Table 1(a) on pdf pages 32 and 33, does not include Footnotes 9b and 9c.
8. The following deficiencies pertain to the revised Traffic Study – Future Conditions Without CPA and Future Conditions With CPA – Exhibits 2-1 and 2-2 (*Lee County*).
 - a. Please revise the service volume along SR 31 from SR 80 to Bayshore Road from 970 to 924. The service volume of 880 (corresponding to acceptable LOS standard D for a Class I 2-lane arterial located in an Urbanized Area) should be adjusted by 5% only once for the presence of exclusive right turn lanes.

² During the SR 31 PD&E Project Traffic teleconference call on May 26, 2017, the applicant stated that the revised development program (emailed to FDOT on May 26, 2017) no longer includes the 42 amateur sports fields, and that the hotel rooms would be reduced from 1,500 to 600 rooms.

- b. Please revise the service volume along SR 31 from Bayshore Road to Old Rodeo Drive from 2,205 to 2,100. The service volume of 2,000 (corresponding to acceptable LOS standard D for a Class I 4-lane arterial located in an Urbanized Area) should be adjusted by 5% only once for the presence of exclusive right turn lanes.

9. The following deficiencies pertain to the revised Traffic Study – Future Conditions Without CPA and Future Conditions With CPA – Exhibits 2-1 and 2-2 (*Charlotte County*).
 - a. Please revise the service volume along SR 31 from Cook Brown Road to DeSoto County Line from 670 to 850 consistent with the Revised Methodology dated November 21, 2016, since it is an uninterrupted highway in a rural developed area.

10. The following deficiencies pertain to the revised Traffic Study – Future Transportation Needs Without CPA.
 - a. Please revise the number of lanes along SR 80 from SR 31 to Buckingham Road from 6 lanes to 4 lanes under the column “Lee Country MPO 2040 LRTP Cost Feasible Network # of Lanes”.
 - b. Please revise the number of lanes along SR 31 from SR 80 to SR 78 from 2 lanes to 4 lanes under the column “Lee Country MPO 2040 LRTP Cost Feasible Network # of Lanes”.
 - c. Based on the analysis provided in Exhibit 2-2, please revise the “CPA Analysis Needed # of Lanes” from 8 to 6 for SR 31 from Lee County Line to Cook Brown Road. Accordingly, please revise the number of lanes under “Changes to Adopted MPO Needs Plan” from “Add 4 lanes” to “Add 2 lanes”.
 - d. Based on the analysis provided in Exhibit 2-2, please revise the “CPA Analysis Needed # of Lanes” from 4 lanes to 6 lanes for I-75 from Charlotte County Line to Tuckers Grade.

11. The following deficiencies pertain to the revised Traffic Study – Future Transportation Needs With CPA:
 - a. FDOT does not support separating right turn volumes from through volumes in determining the number of lanes required for the roadway segment. Therefore, please revise the “CPA Analysis Needed # of Lanes” from 6 lanes to 8 lanes for SR 31 from North River Road to Babcock Lee Entrance similar to “Without Project Scenario”.
 - b. Per the analysis provided in Exhibit 3-2, please revise the “CPA Analysis Needed # of Lanes” from 6 lanes to 4 lanes for SR 31 from Lee County Line to Cook Brown Road.

FDOT District One looks forward to working expeditiously with Lee County and the applicant to address the above listed deficiencies in data, input and analysis and ensure any impacts to the SHS and SIS facilities of state importance are adequately mitigated prior to the submittal of the final amendment package. Please contact Lawrence Massey at (239) 225-1980 or Sarah Catala at (239) 225-1981 (at your earliest convenience) so that we can set up a meeting to review and address these deficiencies.

Sincerely,

Laura Herrscher
District Intermodal Systems Development
Administrator

CC: LK Nandam, P.E., Florida Department of Transportation
Steve Walls, Florida Department of Transportation
Lawrence Massey, Florida Department of Transportation
Sarah Catala, Florida Department of Transportation
Richard Shine, Esq., Florida Department of Transportation
Carmen Monroy, Florida Department of Transportation
Dana Reiding, Florida Department of Transportation
Andy Getch, P.E., Lee County Department of Community Development
David Loveland, AICP, Lee County Department of Community Development
Margaret Wuerstle, Southwest Florida Regional Planning Council
Ray Eubanks, Florida Department of Economic Opportunity
Brenda Winningham, Florida Department of Economic Opportunity
Gary Nelson, Babcock Property Holdings, LLC

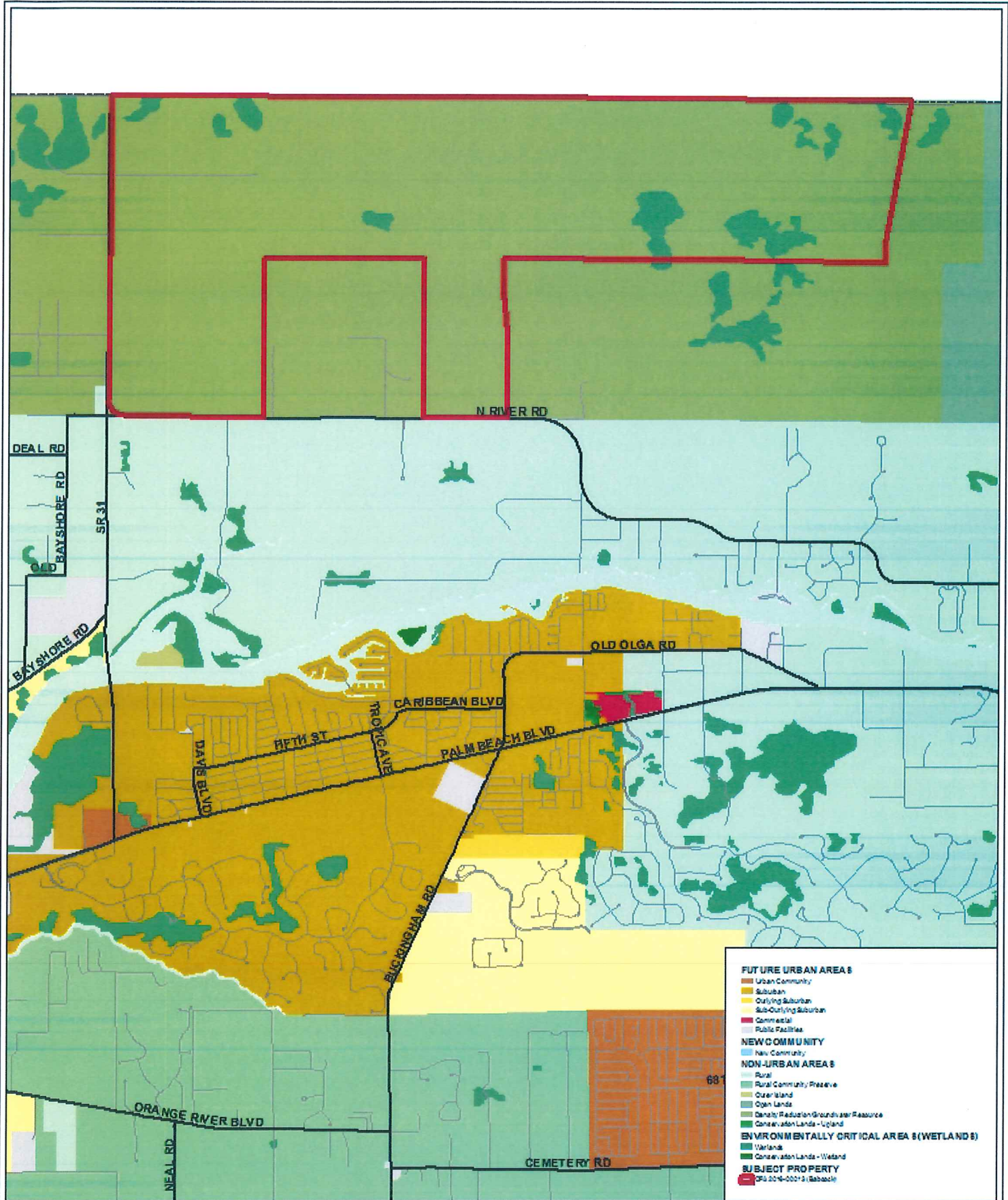
MAPS

Lee County

DEO 17-4DRI

Growth Management Plan

Comprehensive Plan Amendment



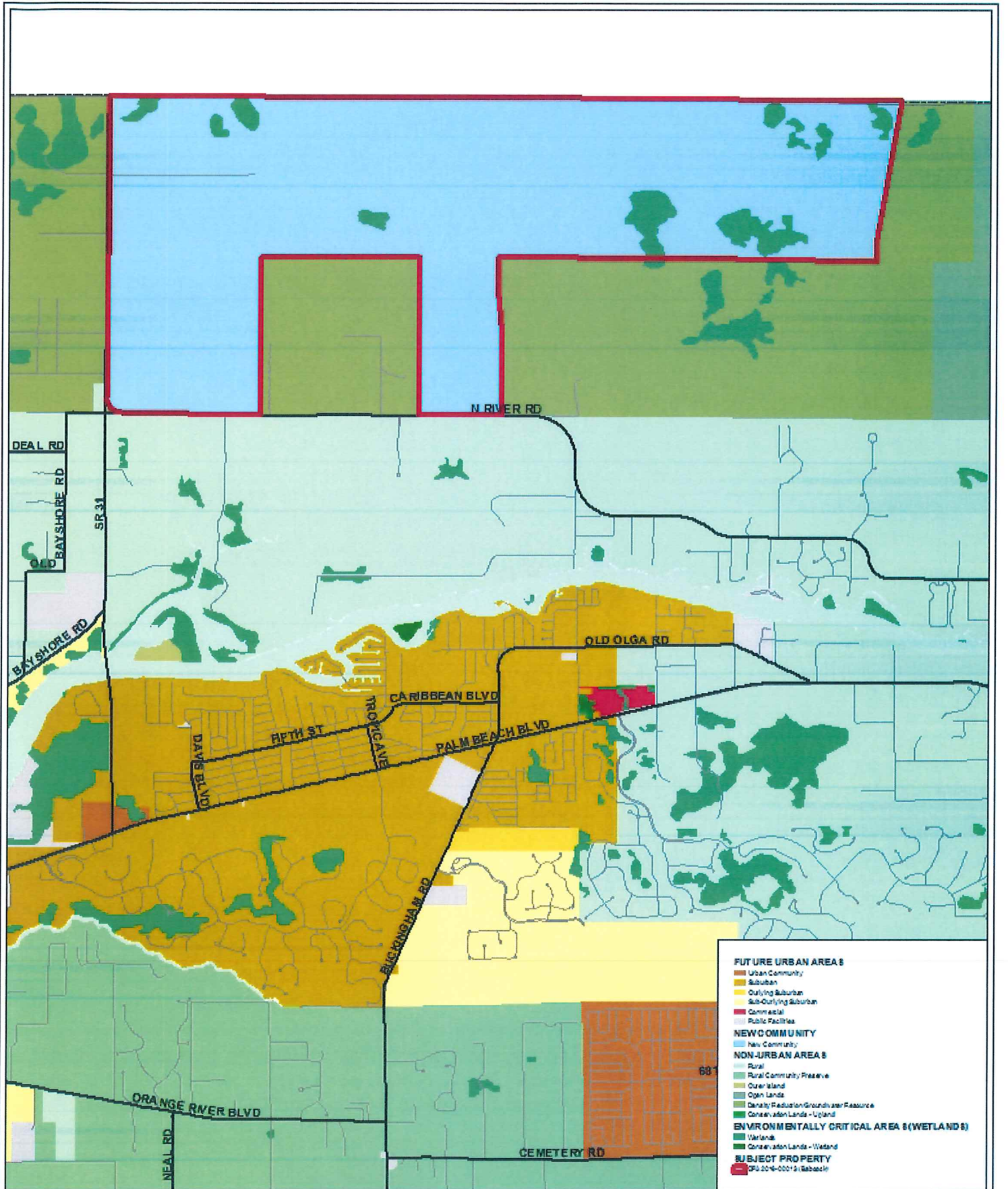
- FUTURE URBAN AREA 8**
- Urban Community
- Suburban
- Outlying Suburban
- Sub-Outlying Suburban
- Commercial
- Public Facilities
- NEW COMMUNITY**
- New Community
- NON-URBAN AREA 8**
- Rural
- Rural Community Preserve
- Open Land
- Open Land
- Density Reduction Groundwater Resource
- Conservation Lands - Upland
- ENVIRONMENTALLY CRITICAL AREA 8 (WETLANDS)**
- Wetland
- Conservation Lands - Wetland
- SUBJECT PROPERTY**
- CPA 2016-00013 (Babcock)

Lee County
Southwest Florida

Map Generated March 2017



CPA2016-00013
Babcock
EXISTING LEE PLAN
FUTURE LAND USE MAP

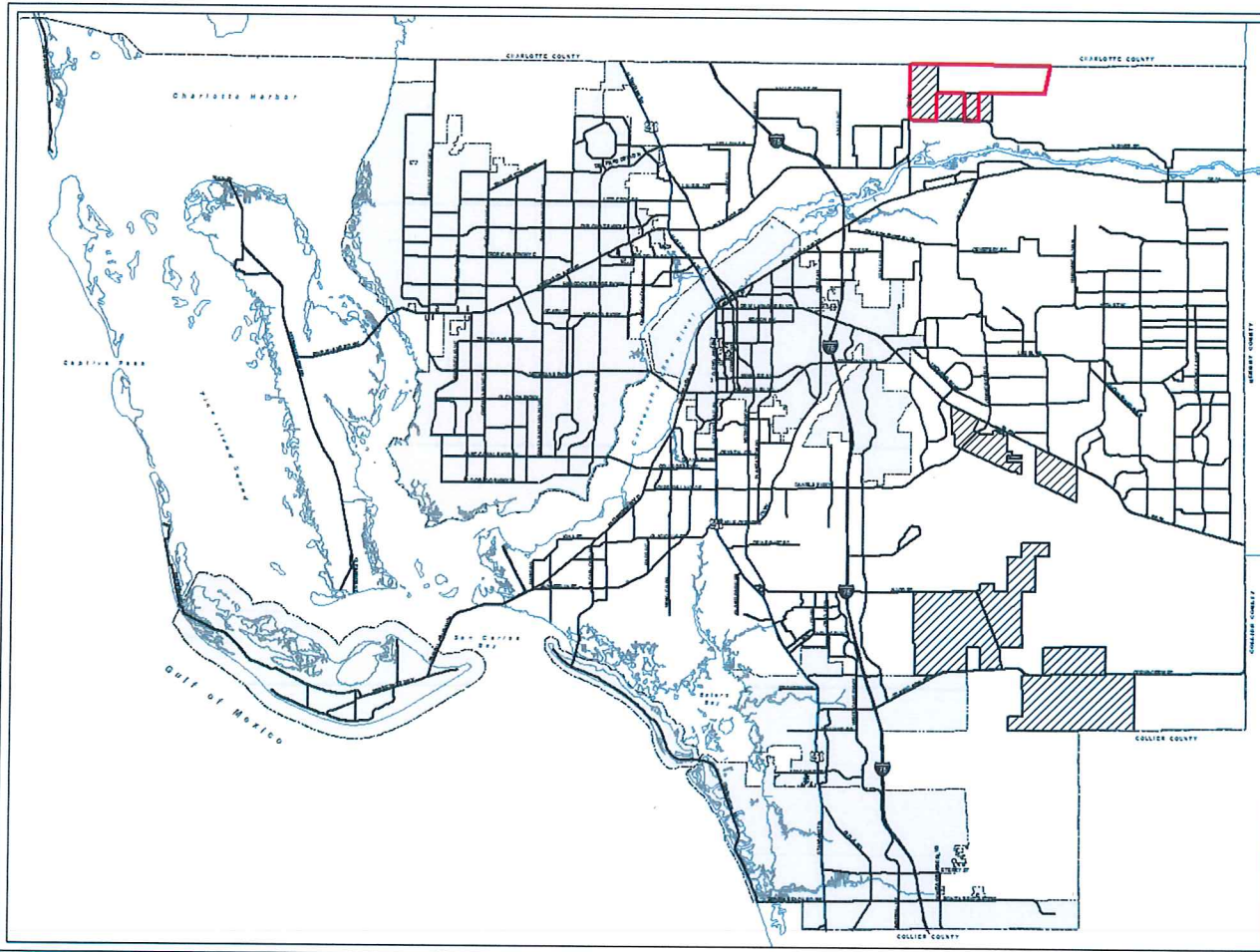


Lee County
Sunshine State

Map Generated March 2017



CPA2016-00013
Babcock
PROPOSED LEE PLAN
FUTURE LAND USE MAP



PRIVATE RECREATIONAL FACILITIES OVERLAY MAP

LEGEND

- County Line
- Major Roads
- Minor Roads
- ▨ Private Recreational Facilities
- ⊞ City Limits

CPA2016-00013
BABCOCK

Remove from Private Recreational Facilities



Map Generated: March 2017
City Limits current to date of map generation
Adopted By Ord. No. 99-16, 11/22/99
Amended By Ord. Nos. 10-21, 10-43

Lee Plan Map 4