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FEB 18 2022

COMMUNITY DEVELOPMENT

February 18, 2022

Lee County Community Development – DCD Planning Section  
Attn: Mr. Brandon Dunn, Principal Planner  
1500 Monroe Street  
Fort Myers, FL 33901

**Subject: Response to Insufficiency Letter  
CPA2021-00015 Greenwell SR 31 Map Amendment – A03**

Dear Intake Team:

Please accept this letter in response to your insufficiency letter dated February 4, 2021, for the above subject project. This letter outlines responses to each comment including stipulations. Please find the following list of information and materials that are being submitted electronically:

1. Response to Insufficiency Letter
2. Exhibit M1 - Comp Plan Amendment – Map Application
3. Exhibit M4 – Proposed Future Land Use Map
4. Exhibit M11 - Lee Plan Analysis with Table 1(b)
5. FGUA Letter of Availability (To be provided on separate cover.)
6. Exhibit M7 – Wetland Areas 1, 3, and 4 Revised

In reply to your review comments, we offer the following responses in **bold**:

1. On Page 1 of the application, under the project description, please remove details that would typically be approved in a zoning application. The requested map amendment, if approved, would not include approvals for any commercial or residential uses. Please correct.

***Response: Please see revised Exhibit M1 Comp Plan Amendment – Map Application’s project description removing the details requested.***

2. Please contact Rick Burris to discuss proposed changes to Table 1(b) at 533-8585 or [RBurris@leegov.com](mailto:RBurris@leegov.com).

***Response: Please see revised Table 1(b), the last page of Exhibit M11, per coordination with Rick Burris.***

3. (Previous Comment) Exhibit M3 – Please provide surrounding property owners list, mailing labels, and map for all parcels within 500 feet of the subject property.

**Please note a hard copy of the mailing labels must be submitted to our office.**

*Response: A hard copy of the surrounding property owners list, mailing labels, and map was submitted to the Community Development Department on 02/17/22.*

#### 4. Lee Plan Analysis

- a) (Previous Comment) Please update the Lee Plan analysis contained in Exhibit M11 and in any other areas of the application based on the most recently effective ordinance, Ordinance #21-09. A new codification of the Lee Plan is available on Lee County’s webpage at [www.leegov.com/dcd/planning/leeplan](http://www.leegov.com/dcd/planning/leeplan).

**It does not appear that the analysis has been updated in all locations. As an example, the analysis of Goal 5 on page 5 of Exhibit 11 makes reference to 2030 population projections and does not seem to provide an analysis of the current Goal 5. Please assure all necessary portions of the application materials have been updated to include the current version of the Lee Plan.**

*Response: Please see updated Exhibit M11 - Lee Plan Analysis with respect to the current version of the Lee Plan.*

#### 5. Public Facilities Impact Analysis (Exhibit M14).

- a) (Previous Comment) LCU's sewer connection requires replacement of force main under the Caloosahatchee River, which may be cost prohibitive. FGUA already has sewer infrastructure north of the river and may be better suited to serve the subject property.

If the applicant wishes to pursue use of LCU utilities, please provide existing and proposed LCU Future Sewer Service Area Maps (Map 4B) to be included in the proposed Map amendments.

If the applicant decides to utilize FGUA sewer facilities, please provide a letter of availability from FGUA for sewer service, update the Sanitary Sewer section of Exhibit M16 (Existing and Future Conditions Analysis), and request a letter of no objection from LCU to allow FGUA to provide sewer service to the subject property.

**Staff acknowledges the clarification provided in the previous response. Please submit the letter of service availability from FGUA.**

*Response: The applicant has been coordinating with LCU and FGUA over the last several weeks in order to provide the letter of no objection. The letter is almost finalized and will be provided on separate cover once received. We appreciate your understanding.*

6. All of the descriptions close with an acceptable closure ratio. However, the sketch for Wetland Area 1 has an inaccurate state plane coordinate at the POB. The as mapped with the state coordinate listed for the POB, a portion of the wetland falls outside of the parent parcel. The sketch for Wetland Area 3 does not include the call table for the numbered calls on the sketch. The call table for Wetland Area 4 is missing calls lines L132, L133 and L134.

*Response: Please see the revised Exhibit M7 addressing the changes to Wetland Areas 1, 3, and 4.*

7. Environmental Impact Analysis
  - a. Will the irrigation lakes be supplemented using the Sandstone aquifer? Has the applicant evaluated the use of the Lower Hawthorn aquifer or a combination of both instead?

*Response: The project will include direct withdrawals from the stormwater management system for irrigation supply. These withdrawals will be re-supplied by groundwater from the Sandstone Aquifer. Actual percentages of lake and groundwater withdrawals will be determined during the water use permitting process with the South Florida Water Management District and will ensure that its use will not result in adverse impacts to the water resource. The Lower Hawthorn aquifer was not selected as a potential irrigation source due to its significant use by Lee County Utilities for Public Water Supply in the immediate area.*

8. (Previous Comment) Exhibit M20 – Community Plan Area requirements. Please provide materials needed to demonstrate the applicant has conducted the required public informational meetings in compliance with the requirements of Policies 17.3.2 and 17.3.3.

**The applicant's previous response is acknowledged. Please provide the required materials once the required meeting have occurred. Please note as required by footnote 7 in Policy 17.3.3, applications within the Northeast Lee County community plan area boundary, a public information meeting must be held within both the Alva and North Olga community plan area boundaries.**

*Response: Acknowledged. The public information meetings have been scheduled for March 1<sup>st</sup> (Alva) and March 2<sup>nd</sup> (North Olga.).*

9. Miscellaneous Comments:

- a. (Previous Comment) How will the widening of State Route 31 by FDOT impact the proposed amendments and the subject property?

**Staff acknowledges the previous comment, however please see following link for the segment of the SR 31 project adjacent to the applicant's property and if necessary reach out to FDOT in order to provide a response to the previous comment.**

*Response: As mentioned previously, we have not received any formal notification of a proposed taking for the widening of SR 31. As such, assessing preliminary plans is at best speculative in nature and at worst detrimental to the current Comprehensive Land Use Plan Amendment presented. However, at your suggestion, we reached out to FDOT and this is the response that we've received from FDOT on the subject project:*

***2/16/2022: "The procurement process to select the contractor/engineering team to widen SR 31 from 2 to 4 lanes from SR 78 to Horseshoe Rd. was completed last month. The design and permitting phase will begin shortly and take approximately 18-24 months. The construction phase will follow. The right-of-way phase will overlap the design and construction phases. We will be able to provide more specific timeframes in a month or so, once the Design-Build Firm has been able to develop their project schedule."***

***-Brian Blair, Assistant District Construction Engineer, FDOT***

We trust the enclosed information is sufficient for your review and approval. Should you have any questions or require additional information, please contact Mr. Brian Farrar at 239-580-8840.

Sincerely,  
**RWA, Inc.**



Kenrick S. Gallander, AICP  
Director of Planning

Attachment(s): Application Submittal Requirements (listed above)

cc: Brian Farrar – President, BCF Management Group, LLC  
Michael R. Whitt & Robert A. Cooper, Partner at Hahn Loeser & Parks, LLP  
File: 190136.02.00





**Public Facilities Impacts**

NOTE: The applicant must calculate public facilities impacts based on the maximum development.

1. **Traffic Circulation Analysis:** The analysis is intended to determine the affect of the land use change on the Financially Feasible Highway Plan Map 3A (20-year plus horizon) and on the Capital Improvements Element (5-year horizon). Toward that end, an applicant must submit a Traffic Impact Statement (TIS) consistent with Lee County Administrative Code (AC)13-17.
  - a. Proposals affecting less than 10 acres, where development parameters are contained within the Traffic Analysis Zone (TAZ) or zones planned population and employment, or where there is no change in allowable density/intensity, may be eligible for a TIS requirement waiver as outlined in the Lee County TIS Guidelines and AC-13-17. Identification of allowable density/intensity in order to determine socio-economic data for affected TAZ(s) must be coordinated with Lee County Planning staff. Otherwise a calculation of trip generation is required consistent with AC-13-17 and the Lee County TIS Guidelines to determine required components of analysis for:
    - i. Total peak hour trip generation less than 50 total trip ends – trip generation.
    - ii. Total peak hour trip generation from 50 to 300 total trip ends – trip generation, trip distribution and trip assignment (manual or Florida Standard Urban Transportation Modeling Structure (FSUTMS) analysis consistent with AC-13-17 and TIS Guidelines), short-term (5 year) and long-range (to current Lee Plan horizon year) segment LOS analysis of the nearest or abutting arterial and major collector segment(s) identified in the Transportation Inventory based on the trip generation and roadway segment LOS analysis criteria in AC-13-17. A methodology meeting is recommended prior to submittal of the application to discuss use of FSUTMS, any changes to analysis requirements, or a combined CPA and Zoning TIS short term analysis.
    - iii. Total peak hour trip generation is over 300 total trip ends - trip generation, mode split, trip distribution and trip assignment (manual or FSUTMS analysis consistent with AC-13-17 and TIS Guidelines), short-term (five-year) and long-range (to current Lee Plan horizon year) segment LOS analysis of arterial and collector segments listed in the Transportation Inventory. LOS analysis will include any portion of roadway segments within an area three miles offset from the boundary of the application legal description metes and bounds survey. LOS analysis will also include any additional segments in the study area based on the roadway segment LOS analysis criteria in AC-13-17. A methodology meeting is required prior to submittal of the application.
  - b. Map amendment - greater than 10 acres - Allowable density/intensity will be determined by Lee County Planning staff.
2. **Provide an existing and future conditions analysis for the following (see Policy 95.1.3):**
  - a. Sanitary Sewer
  - b. Potable Water
  - c. Surface Water/Drainage Basins
  - d. Parks, Recreation, and Open Space
  - e. Public Schools

**Analysis for each of the above should include (but is not limited to) the following (see the Lee County Concurrency Management Report):**

- a. Franchise Area, Basin, or District in which the property is located
- b. Current LOS, and LOS standard of facilities serving the site
- c. Projected 2030 LOS under existing designation
- d. Projected 2030 LOS under proposed designation
- e. Existing infrastructure, if any, in the immediate area with the potential to serve the subject property
- f. Improvements/expansions currently programmed in 5 year CIP, 6-10 year CIP, and long range improvements
- g. Provide a letter of service availability from the appropriate utility for sanitary sewer and potable water

**In addition to the above analysis, provide the following for potable water:**

- a. Determine the availability of water supply within the franchise area using the current water use allocation (Consumptive Use Permit) based on the annual average daily withdrawal rate.
- b. Include the current demand and the projected demand under the existing designation, and the projected demand under the proposed designation.
- c. Include the availability of treatment facilities and transmission lines for reclaimed water for irrigation.
- d. Include any other water conservation measures that will be applied to the site (see Goal 54).

**3. Provide a letter from the appropriate agency determining the adequacy/provision of existing/proposed support facilities, including:**

- a. Fire protection with adequate response times
- b. Emergency medical service (EMS) provisions
- c. Law enforcement
- d. Solid Waste
- e. Mass Transit
- f. Schools

In reference to above, the applicant must supply the responding agency with the information from application items 5, 6, and 7 for their evaluation. This application must include the applicant's correspondence/request to the responding agency.

**Environmental Impacts**

Provide an overall analysis of the character of the subject property and surrounding properties, and assess the site's suitability for the proposed change based upon the following:

1. A map of the Plant Communities as defined by the Florida Land Use Cover and Classification system (FLUCCS).
2. A map and description of the soils found on the property (identify the source of the information).
3. A topographic map depicting the property boundaries and 100-year flood prone areas indicated (as identified by FEMA).
4. A map delineating the property boundaries on the most recent Flood Insurance Rate Map.
5. A map delineating wetlands, aquifer recharge areas, and rare & unique uplands.
6. A table of plant communities by FLUCCS with the potential to contain species (plant and animal) listed by federal, state or local agencies as endangered, threatened or species of special concern. The table must include the listed species by FLUCCS and the species status (same as FLUCCS map).

**Impacts on Historic Resources**

List all historic resources (including structure, districts, and/or archaeologically sensitive areas) and provide an analysis of the proposed change's impact on these resources. The following should be included with the analysis:

1. A map of any historic districts and/or sites listed on the Florida Master Site File which are located on the subject property or adjacent properties.
2. A map showing the subject property location on the archaeological sensitivity map for Lee County.

**Internal Consistency with the Lee Plan**

1. Discuss how the proposal affects established Lee County population projections, Lee Plan Table 1(b) and the total population capacity of the Lee Plan Future Land Use Map.
2. List all goals and objectives of the Lee Plan that are affected by the proposed amendment or that affect the subject property. This analysis should include an evaluation of all relevant policies under each goal and objective.
3. Describe how the proposal affects adjacent local governments and their comprehensive plans.

**State Policy Plan and Regional Policy Plan**

List State Policy Plan and Regional Policy Plan goals, strategies and actions, and policies which are relevant to this plan amendment.

**Justify the proposed amendment based upon sound planning principles**

Support all conclusions made in this justification with adequate data and analysis.

**Planning Communities/Community Plan Area Requirements**

If located within a planning community/community plan area, provide a meeting summary document of the required public informational session [Lee Plan Goal 17].

**Sketch and Legal Description**

The certified legal description(s) and certified sketch of the description for the property subject to the requested change. A metes and bounds legal description must be submitted specifically describing the entire perimeter boundary of the property with accurate bearings and distances for every line. The sketch must be tied to the state plane coordinate system for the Florida West Zone (North America Datum of 1983/1990 Adjustment) with two coordinates, one coordinate being the point of beginning and the other an opposing corner. If the subject property contains wetlands or the proposed amendment includes more than one land use category a metes and bounds legal description, as described above, must be submitted in addition to the perimeter boundary of the property for each wetland or future land use category.

**SUBMITTAL REQUIREMENTS**

***Clearly label all submittal documents with the exhibit name indicated below.***

***For each map submitted, the applicant will be required to submit a 24"x36" version and 8.5"x11" reduced map for inclusion in public hearing packets.***

**MINIMUM SUBMITTAL ITEMS (3 Copies)**

<input type="checkbox"/>	Completed Application (Exhibit – M1)
<input type="checkbox"/>	Filing Fee (Exhibit – M2)
<input type="checkbox"/>	Disclosure of Interest (Exhibit – M3)
<input type="checkbox"/>	Surrounding Property Owners List, Mailing Labels, and Map For All Parcels Within 500 Feet of the Subject Property (Exhibit – M3)
<input type="checkbox"/>	Future Land Use Map - Existing and Proposed (Exhibit – M4)
<input type="checkbox"/>	Map and Description of Existing Land Uses (Not Designations) of the Subject Property and Surrounding Properties (Exhibit – M5)
<input type="checkbox"/>	Map and Description of Existing Zoning of the Subject Property and Surrounding Properties (Exhibit – M6)
<input type="checkbox"/>	Signed/Sealed Legal Description and Sketch of the Description for Each FLUC Proposed (Exhibit – M7)
<input type="checkbox"/>	Copy of the Deed(s) of the Subject Property (Exhibit – M8)
<input type="checkbox"/>	Aerial Map Showing the Subject Property and Surrounding Properties (Exhibit – M9)
<input type="checkbox"/>	Authorization Letter From the Property Owner(s) Authorizing the Applicant to Represent the Owner (Exhibit – M10)
<input type="checkbox"/>	Lee Plan Analysis (Exhibit – M11)
<input type="checkbox"/>	Environmental Impacts Analysis (Exhibit – M12)
<input type="checkbox"/>	Historic Resources Impact Analysis (Exhibit – M13)
<input type="checkbox"/>	Public Facilities Impacts Analysis (Exhibit – M14)
<input type="checkbox"/>	Traffic Circulation Analysis (Exhibit – M15)
<input type="checkbox"/>	Existing and Future Conditions Analysis - Sanitary Sewer, Potable Water, Surface Water/Drainage Basins, Parks and Rec, Open Space, Public Schools (Exhibit – M16)
<input type="checkbox"/>	Letter of Determination For the Adequacy/Provision of Existing/Proposed Support Facilities - Fire Protection, Emergency Medical Service, Law Enforcement, Solid Waste, Mass Transit, Schools (Exhibit – M17)
<input type="checkbox"/>	State Policy Plan and Regional Policy Plan (Exhibit – M18)
<input type="checkbox"/>	Justification of Proposed Amendment (Exhibit – M19)
<input type="checkbox"/>	Planning Communities/Community Plan Area Requirements (Exhibit – M20)

**APPLICANT – PLEASE NOTE:**

Once staff has determined the application is sufficient for review, 15 complete copies will be required to be submitted to staff. These copies will be used for Local Planning Agency hearings, Board of County Commissioners hearings, and State Reviewing Agencies. Staff will notify the applicant prior to each hearing or mail out to obtain the required copies.

If you have any questions regarding this application, please contact the Planning Section at (239)533-8585.



AFFIDAVIT

I, \_\_\_\_\_, certify that I am the owner or authorized representative of the property described herein, and that all answers to the questions in this application and any sketches, data, or other supplementary matter attached to and made a part of this application, are honest and true to the best of my knowledge and belief. I also authorize the staff of Lee County Community Development to enter upon the property during normal working hours for the purpose of investigating and evaluating the request made through this application.

\_\_\_\_\_  
Signature of Applicant

\_\_\_\_\_  
Date

\_\_\_\_\_  
Printed Name of Applicant

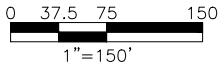
STATE OF FLORIDA  
COUNTY OF LEE

The foregoing instrument was sworn to (or affirmed) and subscribed before me by means of  physical presence or  online notarization on \_\_\_\_\_ (date) by (name of person providing oath or affirmation), who is personally known to me or who has produced \_\_\_\_\_ (type of identification) as identification.

\_\_\_\_\_  
Signature of Notary Public

\_\_\_\_\_  
(Name typed, printed or stamped)

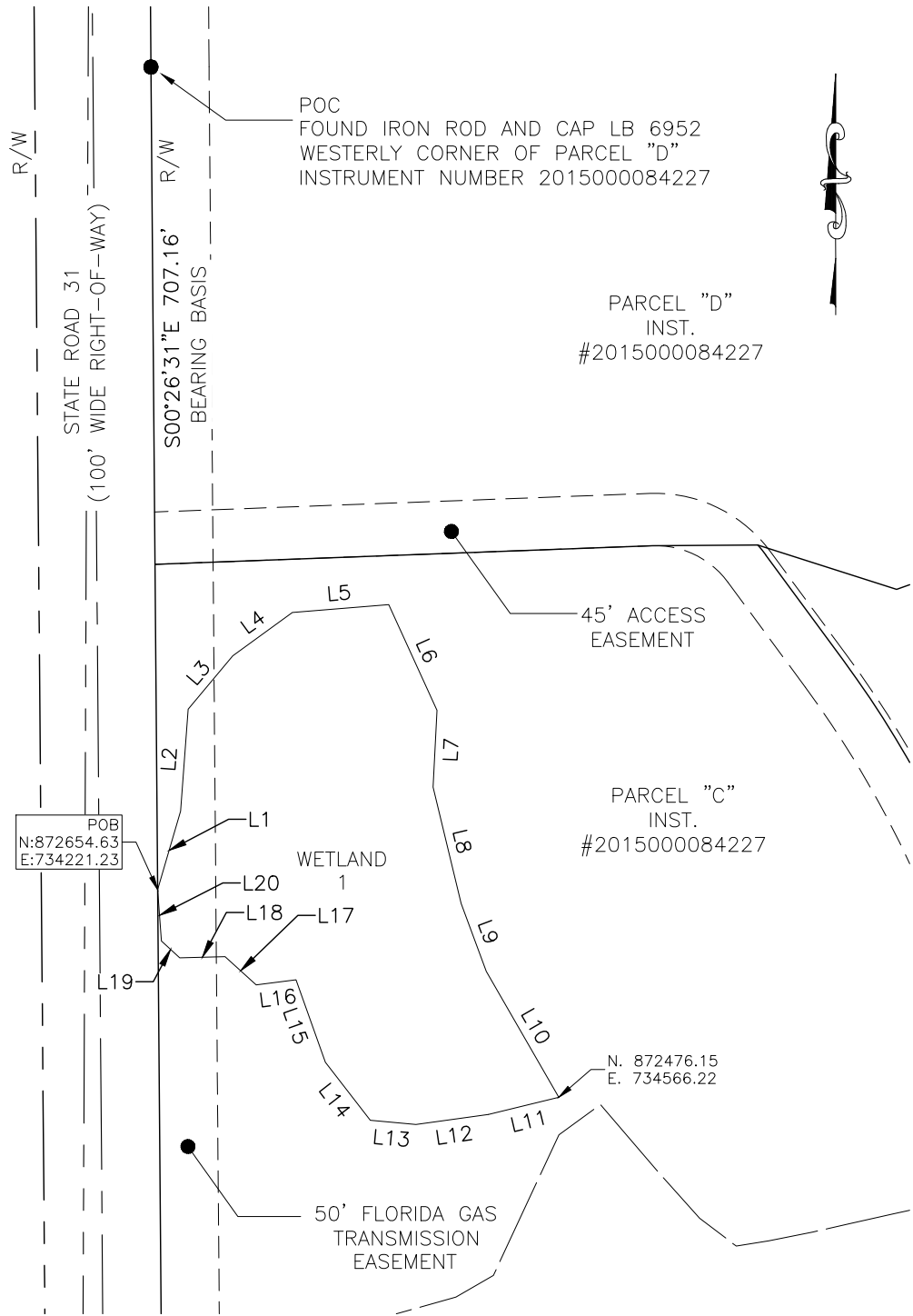




LINE TABLE		
LINE	BEARING	LENGTH
L1	N16°16'17"E	70.35'
L2	N04°16'21"E	87.92'
L3	N39°55'24"E	59.70'
L4	N53°56'41"E	63.41'
L5	N85°23'55"E	83.13'
L6	S24°32'48"E	99.83'
L7	S02°55'09"W	66.09'
L8	S13°36'20"E	102.93'
L9	S20°18'28"E	62.14'
L10	S29°56'31"E	125.02'
L11	S76°19'23"W	62.25'
L12	S82°08'27"W	63.01'
L13	N84°46'28"W	39.39'
L14	N37°46'29"W	63.07'
L15	N19°32'26"W	75.32'
L16	S82°43'06"W	34.59'
L17	N47°50'37"W	36.08'
L18	S88°32'44"W	39.01'
L19	N47°27'41"W	21.37'
L20	N04°11'02"W	44.22'

**LEGEND**  
 POC = POINT OF COMMENCEMENT  
 POB = POINT OF BEGINNING

- NOTES:**
1. THIS SKETCH IS NOT A SURVEY.
  2. BEARINGS SHOWN HEREON ARE BASED ON THE WEST LINE OF PARCEL "D" RECORDED IN INSTRUMENT NUMBER 2015000084227, PUBLIC RECORD OF LEE COUNTY, FLORIDA, WHEREIN THE WEST LINE BEARS S00°26'31"E.
  3. THIS SKETCH DOES NOT MAKE ANY REPRESENTATION AS TO ZONING OR DEVELOPMENT RESTRICTIONS ON THE SUBJECT PARCEL.
  4. PARCEL CONTAINS 88,348 SQUARE FEET (2.03 ACRES) MORE OR LESS.



NOAH J. MEDEIROS DATE \_\_\_\_\_  
 PROFESSIONAL SURVEYOR AND MAPPER  
 FLORIDA CERTIFICATE NO. LS 7345  
 THE SEAL APPEARING ON THIS DOCUMENT WAS  
 AUTHORIZED BY NOAH J. MEDEIROS, PSM.

**WETLAND 1  
 SKETCH AND DESCRIPTION**



12800 University Drive, Suite 175  
 Fort Myers, Florida 33907  
 Phone: (239) 597-0575  
 Fax: (239) 597-0578  
 LB No.: 6952

JOB NUMBER	REVISION	SECTION	TOWNSHIP	RANGE	SCALE	DATE	DRAWN BY	FILE NAME	SHEET
190136.02.00	( )	18	43S	26E	1"=150'	02/09/22	NJM	00-WL1 SD	1 OF 2

February 9, 2022 6:57 AM K:\2019\190136.02.00 Greenwell SR 31\0002 Comp Plan Amendment Prep\Sketch And Descriptions\Wetlands\WETLAND 1\00-WL1 SD.dwg

**LEGAL DESCRIPTION WETLAND 1:**

A TRACT OR PARCEL OF LAND LYING IN SECTION 18, TOWNSHIP 43 SOUTH, RANGE 26 EAST, LEE COUNTY, FLORIDA. BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCING AT THE WESTERLY CORNER OF A PARCEL OF LAND RECORDED IN INSTRUMENT NUMBER 2015000084227 OF THE PUBLIC RECORDS OF LEE COUNTY, FLORIDA, SAID CORNER ALSO LYING ON THE EASTERLY RIGHT-OF-WAY OF STATE ROAD 31 (100 FEET WIDE);

THENCE S.00°26'31"E., ALONG SAID EASTERLY RIGHT-OF-WAY LINE FOR 707.16 FEET TO THE POINT OF BEGINNING OF THE HEREIN DESCRIBED PARCEL;

THENCE N.16°16'17"E., FOR 70.35 FEET;

THENCE N.04°16'21"E., FOR 87.92 FEET;

THENCE N.39°55'24"E., FOR 59.70 FEET;

THENCE N.53°56'41"E., FOR 63.41 FEET;

THENCE N.85°23'55"E., FOR 83.13 FEET;

THENCE S.24°32'48"E., FOR 99.83 FEET;

THENCE S.02°55'09"W., FOR 66.09 FEET;

THENCE S.13°36'20"E., FOR 102.93 FEET;

THENCE S.20°18'28"E., FOR 62.14 FEET;

THENCE S.29°56'31"E., FOR 125.02 FEET;

THENCE S.76°19'23"W., FOR 62.25 FEET;

THENCE S.82°08'27"W., FOR 63.01 FEET;

THENCE N.84°46'28"W., FOR 39.39 FEET;

THENCE N.37°46'29"W., FOR 63.07 FEET;

THENCE N.19°32'26"W., FOR 75.32 FEET;

THENCE S.82°43'06"W., FOR 34.59 FEET;

THENCE N.47°50'37"W., FOR 36.08 FEET;

THENCE S.88°32'44"W., FOR 39.01 FEET;

THENCE N.47°27'41"W., FOR 21.37 FEET;

THENCE N.04°11'02"W., FOR 44.22 FEET TO THE POINT OF BEGINNING OF THE PARCEL DESCRIBED HEREIN;

CONTAINING 88,348 SQUARE FEET OR 2.03 ACRES, MORE OR LESS.

WETLAND 1  
SKETCH AND DESCRIPTION



12800 University Drive, Suite 175  
Fort Myers, Florida 33907  
Phone: (239) 597-0575  
Fax: (239) 597-0578  
LB No.: 6952

February 9, 2022 6:57 AM K:\2019\190136.02.00 Greenwell SR 31\0002 Comp Plan Amendment Prep\Sketch And Descriptions\Wetlands\WETLAND 1\00-WL1 SD.dwg

JOB NUMBER	REVISION	SECTION	TOWNSHIP	RANGE	SCALE	DATE	DRAWN BY	FILE NAME	SHEET
190136.02.00	( )	18	43S	26E	1"=###'	02/09/22	NJM	00-WL1 SD	2 OF 2



**LEGAL DESCRIPTION WETLAND 3:**

A TRACT OR PARCEL OF LAND LYING IN SECTION 18, TOWNSHIP 43 SOUTH, RANGE 26 EAST, LEE COUNTY, FLORIDA. BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCING AT THE SOUTHWEST CORNER OF PARCEL "B" RECORDED IN INSTRUMENT NUMBER 2015000084227 OF THE PUBLIC RECORDS OF LEE COUNTY, FLORIDA;

THENCE S.38°35'07"W., FOR 31.74 FEET TO THE POINT OF BEGINNING OF THE HEREIN DESCRIBED PARCEL;

THENCE S.09°21'52"E., FOR 46.47 FEET;

THENCE S.20°19'38"E., FOR 26.50 FEET;

THENCE S.17°19'39"E., FOR 25.00 FEET;

THENCE CONTINUE S.17°19'39"E., FOR 30.76 FEET;

THENCE S.30°45'50"W., FOR 23.01 FEET;

THENCE S.26°15'25"W., FOR 33.25 FEET;

THENCE S.34°50'41"E., FOR 36.36 FEET;

THENCE S.30°42'29"E., FOR 24.64 FEET;

THENCE S.37°20'49"E., FOR 13.50 FEET;

THENCE S.31°28'58"W., FOR 21.72 FEET;

THENCE S.23°02'22"W., FOR 15.22 FEET;

THENCE S.59°28'31"W., FOR 13.90 FEET;

THENCE S.50°06'50"W., FOR 23.76 FEET;

THENCE S.56°56'24"W., FOR 32.00 FEET;

THENCE S.36°42'37"W., FOR 48.93 FEET;

THENCE S.44°24'59"W., FOR 37.42 FEET;

THENCE S.53°03'58"W., FOR 40.30 FEET;

THENCE S.53°00'55"W., FOR 34.22 FEET;

THENCE S.55°41'56"W., FOR 34.54 FEET;

THENCE S.31°14'34"W., FOR 34.82 FEET;

THENCE S.45°41'58"W., FOR 24.97 FEET;

THENCE S.82°05'17"W., FOR 49.68 FEET;

THENCE N.14°10'03"W., FOR 44.69 FEET;

THENCE N.51°38'36"W., FOR 20.42 FEET;

THENCE N.48°57'25"W., FOR 37.91 FEET;

THENCE N.58°44'06"W., FOR 46.83 FEET;

THENCE N.44°35'02"W., FOR 33.19 FEET;

THENCE N.43°07'11"W., FOR 24.61 FEET;

THENCE N.05°08'47"W., FOR 21.35 FEET;

THENCE N.39°43'46"W., FOR 17.26 FEET;

THENCE S.73°30'50"W., FOR 19.51 FEET;

THENCE S.88°03'14"W., FOR 33.16 FEET;

THENCE S.79°06'39"W., FOR 24.03 FEET;

THENCE S.31°35'04"W., FOR 72.72 FEET;

THENCE S.35°01'58"W., FOR 23.59 FEET;

THENCE N.79°17'35"W., FOR 47.75 FEET;

THENCE S.87°26'10"W., FOR 51.89 FEET;

THENCE N.81°10'46"W., FOR 58.76 FEET;

THENCE N.80°14'26"W., FOR 81.78 FEET;

THENCE N.15°04'34"W., FOR 73.78 FEET;

THENCE N.02°41'15"E., FOR 51.44 FEET;

THENCE N.27°11'52"E., FOR 43.75 FEET;

THENCE N.06°31'08"W., FOR 81.63 FEET;

THENCE N.16°37'06"E., FOR 47.20 FEET;

THENCE N.74°19'20"E., FOR 106.42 FEET;

THENCE N.59°56'59"E., FOR 37.17 FEET;

THENCE N.24°59'21"E., FOR 133.42 FEET;

THENCE N.53°52'55"E., FOR 44.19 FEET;

THENCE S.40°37'39"E., FOR 76.94 FEET;

THENCE S.41°53'41"E., FOR 52.88 FEET;

THENCE S.52°41'50"E., FOR 39.52 FEET;

THENCE N.80°47'13"E., FOR 28.38 FEET;

THENCE N.78°42'14"E., FOR 38.37 FEET;

THENCE N.77°13'53"E., FOR 33.78 FEET;

THENCE N.77°22'36"E., FOR 36.58 FEET;

THENCE N.77°54'13"E., FOR 29.25 FEET;

THENCE N.76°37'39"E., FOR 36.01 FEET;

THENCE N.87°44'51"E., FOR 41.01 FEET;

THENCE N.85°07'49"E., FOR 40.96 FEET;

THENCE N.87°49'16"E., FOR 38.53 FEET;

THENCE N.79°06'10"E., FOR 17.42 FEET;

THENCE N.39°57'28"E., FOR 40.27 FEET;

THENCE S.40°58'45"E., FOR 51.27 FEET;

THENCE S.35°14'17"E., FOR 37.90 FEET TO THE POINT OF BEGINNING OF THE PARCEL DESCRIBED HEREIN;

CONTAINING 315,181 SQUARE FEET OR 7.24 ACRES, MORE OR LESS.

**WETLAND 3  
SKETCH AND DESCRIPTION**



12800 University Drive, Suite 175  
Fort Myers, Florida 33907  
Phone: (239) 597-0575  
Fax: (239) 597-0578  
LB No.: 6952

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JOB NUMBER	REVISION	SECTION	TOWNSHIP	RANGE	SCALE	DATE	DRAWN BY	FILE NAME	SHEET
190136.02.00	( )	18	43S	26E	1"=###'	11/10/21	NJM	00-WL3 SD	2 OF 3



February 9, 2022 7:13 AM K:\2019\190136.02-00-Greenwell-SR-31\0002-Comp-Plan-Amendment-Prep\Sketch-And-Descriptions\Wetlands\WETLAND-3\00-WL3-SD.dwg

LINE TABLE		
LINE	BEARING	LENGTH
L1	S09°21'52"E	46.47'
L2	S20°19'38"E	26.50'
L3	S17°19'39"E	25.00'
L4	S17°19'39"E	30.76'
L5	S30°45'50"W	23.01'
L6	S26°15'25"W	33.25'
L7	S34°50'41"E	36.36'
L8	S30°42'29"E	24.64'
L9	S37°20'49"E	13.50'
L10	S31°28'58"W	21.72'
L11	S23°02'22"W	15.22'
L12	S59°28'31"W	13.90'
L13	S50°06'50"W	23.76'
L14	S56°56'24"W	32.00'
L15	S36°42'37"W	48.93'
L16	S44°24'59"W	37.42'
L17	S53°03'58"W	40.30'
L18	S53°00'55"W	34.22'
L19	S55°41'56"W	34.54'
L20	S31°14'34"W	34.82'
L21	S45°41'58"W	24.97'
L22	S82°05'17"W	49.68'

LINE TABLE		
LINE	BEARING	LENGTH
L23	N14°10'03"W	44.69'
L24	N51°38'36"W	20.42'
L25	N48°57'25"W	37.91'
L26	N58°44'06"W	46.83'
L27	N44°35'02"W	33.19'
L28	N43°07'11"W	24.61'
L29	N05°08'47"W	21.35'
L30	N39°43'46"W	17.26'
L31	S73°30'50"W	19.51'
L32	S88°03'14"W	33.16'
L33	S79°06'39"W	24.03'
L34	S31°35'04"W	72.72'
L35	S35°01'58"W	23.59'
L36	N79°17'35"W	47.75'
L37	S87°26'10"W	51.89'
L38	N81°10'46"W	58.76'
L39	N80°14'26"W	81.78'
L40	N15°04'34"W	73.78'
L41	N02°41'15"E	51.44'
L42	N27°11'52"E	43.75'
L43	N06°31'08"W	81.63'
L44	N16°37'06"E	47.20'

LINE TABLE		
LINE	BEARING	LENGTH
L45	N74°19'20"E	106.42'
L46	N59°56'59"E	37.17'
L47	N24°59'21"E	133.42'
L48	N53°52'55"E	44.19'
L49	S40°37'39"E	76.94'
L50	S41°53'41"E	52.88'
L51	S52°41'50"E	39.52'
L52	N80°47'13"E	28.38'
L53	N78°42'14"E	38.37'
L54	N77°13'53"E	33.78'
L55	N77°22'36"E	36.58'
L56	N77°54'13"E	29.25'
L57	N76°37'39"E	36.01'
L58	N87°44'51"E	41.01'
L59	N85°07'49"E	40.96'
L60	N87°49'16"E	38.53'
L61	N79°06'10"E	17.42'
L62	N39°57'28"E	40.27'
L63	S40°58'45"E	51.27'
L64	S35°14'17"E	37.90'

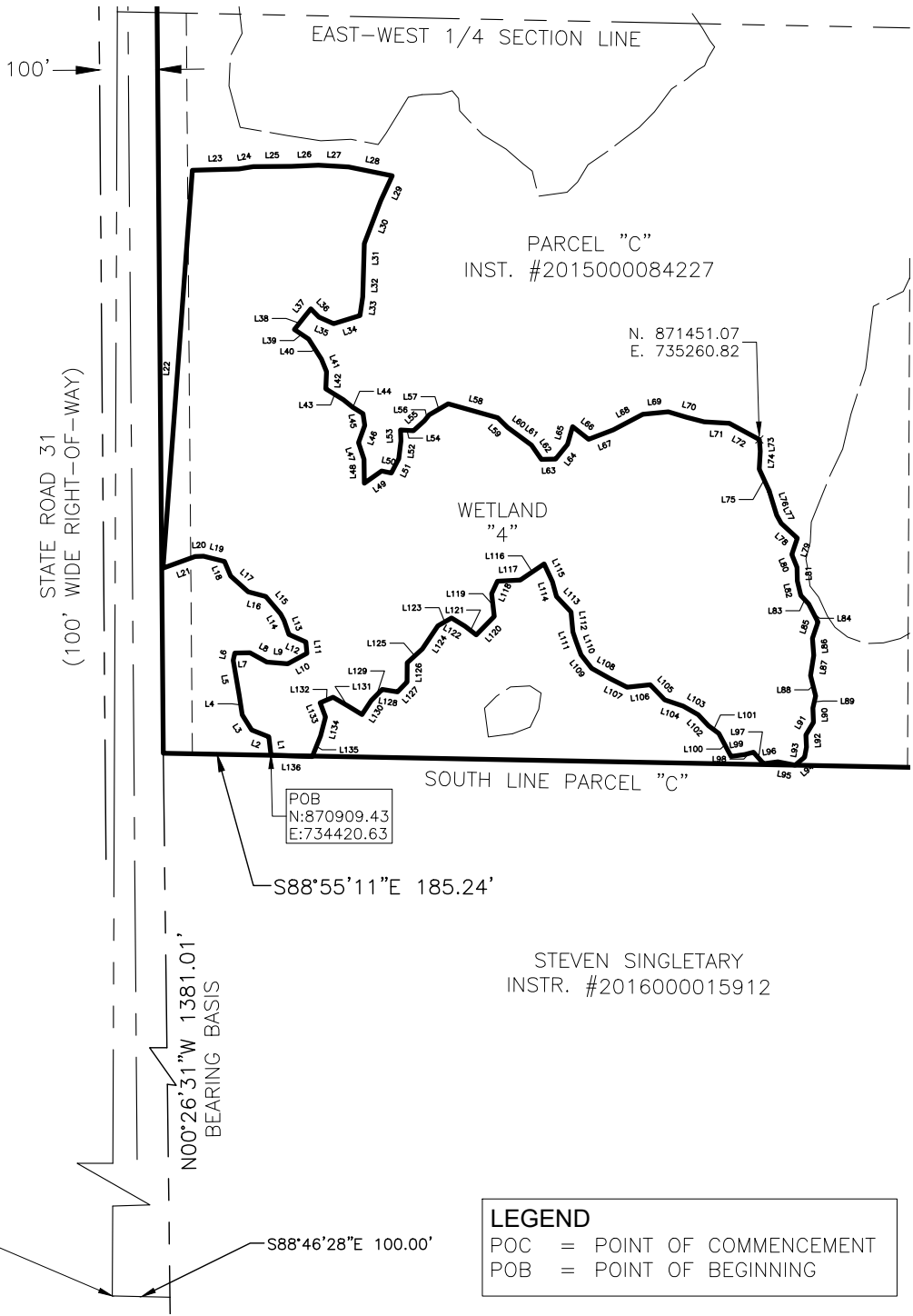
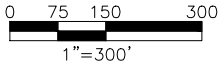
WETLAND 3  
SKETCH AND DESCRIPTION



12800 University Drive, Suite 175  
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LB No.: 6952

JOB NUMBER	REVISION	SECTION	TOWNSHIP	RANGE	SCALE	DATE	DRAWN BY	FILE NAME	SHEET
190136.02.00	(01)	18	43S	26E	1"=###'	02/09/22	NJM	00-WL3 SD	3 OF 3

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POINT OF COMMENCEMENT  
THE SOUTHWEST CORNER  
OF SECTION 18, TOWNSHIP 43  
SOUTH, RANGE 26 EAST

PARCEL "C"  
INST. #2015000084227

N. 871451.07  
E. 735260.82

WETLAND  
"4"

SOUTH LINE PARCEL "C"

POB  
N:870909.43  
E:734420.63

STEVEN SINGLETARY  
INSTR. #2016000015912

**LEGEND**  
POC = POINT OF COMMENCEMENT  
POB = POINT OF BEGINNING

**NOTES:**

1. THIS SKETCH IS NOT A SURVEY.
2. BEARINGS SHOWN HEREON ARE BASED ON THE WEST LINE OF PARCEL "C" RECORDED IN INSTRUMENT NUMBER 2015000084227, PUBLIC RECORD OF LEE COUNTY, FLORIDA, WHEREIN THE WEST LINE BEARS N00°26'31"E.
3. THIS SKETCH DOES NOT MAKE ANY REPRESENTATION AS TO ZONING OR DEVELOPMENT RESTRICTIONS ON THE SUBJECT PARCEL.
4. PARCEL CONTAINS 568,808 SQUARE FEET (13.06 ACRES) MORE OR LESS.

NOAH J. MEDEIROS DATE  
PROFESSIONAL SURVEYOR AND MAPPER  
FLORIDA CERTIFICATE NO. LS 7345  
THE SEAL APPEARING ON THIS DOCUMENT WAS  
AUTHORIZED BY NOAH J. MEDEIROS, PSM.

**WETLAND 4  
SKETCH AND DESCRIPTION**



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LB No.: 6952

JOB NUMBER 190136.02.00	REVISION (01)	SECTION 18	TOWNSHIP 43S	RANGE 26E	SCALE 1"=300'	DATE 02/09/22	DRAWN BY NJM	FILE NAME 00-WL4 SD	SHEET 1 OF 2
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**LEGAL DESCRIPTION WETLAND 4:**

A TRACT OR PARCEL OF LAND LYING IN SECTION 18, TOWNSHIP 43 SOUTH, RANGE 26 EAST, LEE COUNTY, FLORIDA. BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCING AT THE SOUTHWEST CORNER OF SAID SECTION 18, SAID CORNER LYING ON THE WESTERLY RIGHT-OF-WAY OF STATE ROAD 31 (100 FEET WIDE); THENCE S.88°46'28"E., FOR 100.00 FEET TO THE EASTERLY RIGHT-OF-WAY OF SAID STATE ROAD 31;

THENCE ALONG SAID EASTERLY RIGHT-OF-WAY LINE N.00°26'31"W., FOR 1381.01 FEET TO A POINT AT THE SOUTHWEST CORNER OF A PARCEL OF LAND RECORDED IN INSTRUMENT NUMBER 2015000084227 OF THE PUBLIC RECORDS OF LEE COUNTY, FLORIDA;

THENCE S.88°55'11"E., FOR 185.24 FEET TO THE POINT OF BEGINNING OF THE HEREIN DESCRIBED PARCEL.

THENCE N.06°40'24"W., FOR 31.96 FEET;  
 THENCE N.68°29'43"W., FOR 31.73 FEET;  
 THENCE N.31°46'06"W., FOR 30.86 FEET;  
 THENCE N.08°41'32"W., FOR 34.15 FEET;  
 THENCE N.09°39'04"W., FOR 60.75 FEET;  
 THENCE N.11°53'51"E., FOR 12.82 FEET;  
 THENCE N.88°55'15"E., FOR 26.12 FEET;  
 THENCE S.60°49'13"E., FOR 33.12 FEET;  
 THENCE S.85°28'23"E., FOR 36.22 FEET;  
 THENCE N.61°31'22"E., FOR 37.48 FEET;  
 THENCE N.05°26'41"W., FOR 19.63 FEET;  
 THENCE N.65°50'12"W., FOR 32.00 FEET;  
 THENCE N.18°58'45"W., FOR 25.30 FEET;  
 THENCE N.28°21'31"W., FOR 12.70 FEET;  
 THENCE N.40°16'46"W., FOR 39.29 FEET;  
 THENCE N.74°51'33"W., FOR 31.33 FEET;  
 THENCE N.48°18'44"W., FOR 40.72 FEET;  
 THENCE N.22°27'35"W., FOR 27.07 FEET;  
 THENCE N.75°43'18"W., FOR 37.27 FEET;  
 THENCE S.87°42'52"W., FOR 14.34 FEET;  
 THENCE S.70°10'00"W., FOR 58.76 FEET;  
 THENCE N.04°12'49"E., FOR 685.69 FEET;

THENCE N.88°24'16"E., FOR 80.01 FEET;  
 THENCE N.80°29'57"E., FOR 25.26 FEET;  
 THENCE N.89°33'08"E., FOR 65.65 FEET;  
 THENCE N.87°41'07"E., FOR 46.32 FEET;  
 THENCE S.86°47'18"E., FOR 51.83 FEET;  
 THENCE S.78°27'50"E., FOR 76.82 FEET;  
 THENCE S.24°49'10"W., FOR 47.17 FEET;  
 THENCE S.20°53'43"W., FOR 78.93 FEET;  
 THENCE S.01°44'53"W., FOR 50.42 FEET;  
 THENCE S.01°56'32"W., FOR 41.31 FEET;  
 THENCE S.08°16'50"W., FOR 32.43 FEET;  
 THENCE S.73°02'09"W., FOR 47.42 FEET;  
 THENCE N.66°13'54"W., FOR 27.52 FEET;  
 THENCE N.44°14'09"W., FOR 19.94 FEET;  
 THENCE S.39°12'34"W., FOR 18.22 FEET;  
 THENCE S.38°08'48"W., FOR 27.08 FEET;  
 THENCE S.56°11'52"E., FOR 29.46 FEET;  
 THENCE S.32°23'31"E., FOR 41.13 FEET;  
 THENCE S.21°54'58"E., FOR 23.03 FEET;  
 THENCE S.02°10'18"W., FOR 29.58 FEET;  
 THENCE S.58°13'08"E., FOR 35.54 FEET;  
 THENCE S.54°26'02"E., FOR 41.34 FEET;

**WETLAND 4  
 SKETCH AND DESCRIPTION**



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JOB NUMBER	REVISION	SECTION	TOWNSHIP	RANGE	SCALE	DATE	DRAWN BY	FILE NAME	SHEET
190136.02.00	( )	18	43S	26E	1"=###'	11/10/21	NJM	00-WL4 SD	2 OF 2

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THENCE S.08°58'45"E., FOR 20.34 FEET;  
 THENCE S.20°14'43"W., FOR 31.49 FEET;  
 THENCE S.18°07'40"E., FOR 30.42 FEET;  
 THENCE S.00°53'24"E., FOR 40.94 FEET;  
 THENCE N.54°54'01"E., FOR 36.48 FEET;  
 THENCE S.78°13'08"E., FOR 17.05 FEET;  
 THENCE N.27°16'46"E., FOR 27.80 FEET;  
 THENCE N.07°04'21"E., FOR 30.91 FEET;  
 THENCE N.02°25'52"W., FOR 18.69 FEET;  
 THENCE S.86°28'45"E., FOR 22.18 FEET;  
 THENCE N.47°57'40"E., FOR 25.47 FEET;  
 THENCE N.38°27'33"E., FOR 13.16 FEET;  
 THENCE N.59°53'38"E., FOR 37.87 FEET;  
 THENCE S.74°12'33"E., FOR 88.51 FEET;  
 THENCE S.45°38'51"E., FOR 23.52 FEET;  
 THENCE S.53°41'28"E., FOR 20.94 FEET;  
 THENCE S.53°11'36"E., FOR 30.39 FEET;  
 THENCE S.35°06'40"E., FOR 29.71 FEET;  
 THENCE N.89°11'07"E., FOR 24.40 FEET;  
 THENCE N.39°09'51"E., FOR 32.66 FEET;  
 THENCE N.15°44'57"E., FOR 31.72 FEET;  
 THENCE S.51°28'59"E., FOR 35.05 FEET;  
 THENCE N.69°04'09"E., FOR 45.53 FEET;  
 THENCE N.62°09'38"E., FOR 57.44 FEET;  
 THENCE N.84°27'14"E., FOR 43.94 FEET;  
 THENCE S.74°22'21"E., FOR 64.14 FEET;  
 THENCE S.86°41'48"E., FOR 43.25 FEET;  
 THENCE S.61°34'58"E., FOR 58.86 FEET;  
 THENCE S.04°50'35"E., FOR 20.15 FEET;  
 THENCE S.03°32'14"W., FOR 30.71 FEET;

THENCE S.24°22'25"E., FOR 40.97 FEET;  
 THENCE S.17°30'26"E., FOR 43.96 FEET;  
 THENCE S.28°17'52"E., FOR 16.02 FEET;  
 THENCE S.47°42'45"E., FOR 37.64 FEET;  
 THENCE S.18°51'41"W., FOR 29.62 FEET;  
 THENCE S.22°06'09"E., FOR 24.04 FEET;  
 THENCE S.01°08'33"E., FOR 23.22 FEET;  
 THENCE S.13°18'57"E., FOR 25.85 FEET;  
 THENCE S.43°03'53"E., FOR 19.89 FEET;  
 THENCE S.27°00'09"E., FOR 35.03 FEET;  
 THENCE S.18°42'31"W., FOR 29.58 FEET;  
 THENCE S.04°35'52"E., FOR 29.34 FEET;  
 THENCE S.08°59'44"W., FOR 35.11 FEET;  
 THENCE S.13°51'57"E., FOR 36.02 FEET;  
 THENCE S.12°29'29"W., FOR 21.18 FEET;  
 THENCE S.01°55'27"E., FOR 24.99 FEET;  
 THENCE S.31°18'51"W., FOR 25.13 FEET;  
 THENCE S.03°00'06"E., FOR 20.83 FEET;  
 THENCE S.10°40'07"W., FOR 17.78 FEET;  
 THENCE S.49°35'10"W., FOR 21.18 FEET;  
 THENCE N.78°59'13"W., FOR 30.35 FEET;  
 THENCE S.82°35'08"W., FOR 24.81 FEET;  
 THENCE N.41°37'50"W., FOR 26.38 FEET;  
 THENCE S.74°47'34"W., FOR 15.53 FEET;  
 THENCE S.82°20'44"W., FOR 23.64 FEET;  
 THENCE N.27°57'03"W., FOR 44.62 FEET;  
 THENCE N.53°27'12"W., FOR 22.27 FEET;  
 THENCE N.42°54'28"W., FOR 25.92 FEET;  
 THENCE N.59°47'20"W., FOR 29.66 FEET;  
 THENCE N.71°25'01"W., FOR 33.75 FEET;

WETLAND 4  
 SKETCH AND DESCRIPTION



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JOB NUMBER	REVISION	SECTION	TOWNSHIP	RANGE	SCALE	DATE	DRAWN BY	FILE NAME	SHEET
190136.02.00	( )	18	43S	26E	1"=###'	11/10/21	NJM	00-WL4 SD	3 OF 2

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THENCE N.43°40'43"W., FOR 35.91 FEET;  
 THENCE S.83°38'46"W., FOR 40.09 FEET;  
 THENCE N.63°02'18"W., FOR 33.47 FEET;  
 THENCE N.60°56'58"W., FOR 35.75 FEET;  
 THENCE N.37°59'03"W., FOR 29.57 FEET;  
 THENCE N.20°08'59"W., FOR 24.52 FEET;  
 THENCE N.18°21'47"W., FOR 17.14 FEET;  
 THENCE N.05°42'40"W., FOR 34.78 FEET;  
 THENCE N.43°35'09"W., FOR 36.27 FEET;  
 THENCE N.15°09'10"W., FOR 26.50 FEET;  
 THENCE N.24°43'13"W., FOR 33.75 FEET;  
 THENCE S.55°47'01"W., FOR 49.70 FEET;  
 THENCE S.87°03'41"W., FOR 39.32 FEET;  
 THENCE S.25°05'37"W., FOR 23.65 FEET;  
 THENCE S.06°33'07"E., FOR 39.31 FEET;  
 THENCE S.44°22'09"W., FOR 44.18 FEET;  
 THENCE N.52°38'55"W., FOR 24.59 FEET;  
 THENCE N.58°43'54"W., FOR 26.81 FEET;  
 THENCE S.60°06'20"W., FOR 27.15 FEET;  
 THENCE S.33°55'12"W., FOR 47.80 FEET;  
 THENCE S.47°46'09"W., FOR 35.17 FEET;  
 THENCE S.00°28'35"W., FOR 33.08 FEET;  
 THENCE S.44°12'13"W., FOR 23.66 FEET;  
 THENCE N.80°50'59"W., FOR 26.72 FEET;  
 THENCE S.44°38'11"W., FOR 26.74 FEET;  
 THENCE S.33°11'19"W., FOR 28.86 FEET;  
 THENCE N.59°14'05"W., FOR 58.11 FEET;  
 THENCE S.66°25'19"W., FOR 24.24 FEET;  
 THENCE S.21°07'04"E., FOR 26.17 FEET;

THENCE S.14°52'35"W., FOR 33.50 FEET;  
 THENCE S.21°51'45"W., FOR 38.29 FEET;  
 THENCE N.88°14'12"W., FOR 71.16 FEET TO THE POINT OF  
 BEGINNING OF THE PARCEL DESCRIBED HEREIN;  
 CONTAINING 568,808 SQUARE FEET OR 13.06 ACRES,  
 MORE OR LESS.

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190136.02.00	( )	18	43S	26E	1"=###'	11/10/21	NJM	00-WL4 SD	4 OF 4

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LINE TABLE		
LINE	BEARING	LENGTH
L1	N06°40'24"W	31.96'
L2	N68°29'43"W	31.73'
L3	N31°46'06"W	30.86'
L4	N08°41'32"W	34.15'
L5	N09°39'04"W	60.75'
L6	N11°53'51"E	12.82'
L7	N88°55'15"E	26.12'
L8	S60°49'13"E	33.12'
L9	S85°28'23"E	36.22'
L10	N61°31'22"E	37.48'
L11	N05°26'41"W	19.63'
L12	N65°50'12"W	32.00'
L13	N18°58'45"W	25.30'
L14	N28°21'31"W	12.70'
L15	N40°16'46"W	39.29'
L16	N74°51'33"W	31.33'
L17	N48°18'44"W	40.72'
L18	N22°27'35"W	27.07'
L19	N75°43'18"W	37.27'
L20	S87°42'52"W	14.34'

LINE TABLE		
LINE	BEARING	LENGTH
L21	S70°10'00"W	58.76'
L22	N04°12'49"E	685.69'
L23	N88°24'16"E	80.01'
L24	N80°29'57"E	25.26'
L25	N89°33'08"E	65.65'
L26	N87°41'07"E	46.32'
L27	S86°47'18"E	51.83'
L28	S78°27'50"E	76.82'
L29	S24°49'10"W	47.17'
L30	S20°53'43"W	78.93'
L31	S01°44'53"W	50.42'
L32	S01°56'32"W	41.31'
L33	S08°16'50"W	32.43'
L34	S73°02'09"W	47.42'
L35	N66°13'54"W	27.52'
L36	N44°14'09"W	19.94'
L37	S39°12'34"W	18.22'
L38	S38°08'48"W	27.08'
L39	S56°11'52"E	29.46'
L40	S32°23'31"E	41.13'

LINE TABLE		
LINE	BEARING	LENGTH
L41	S21°54'58"E	23.03'
L42	S02°10'18"W	29.58'
L43	S58°13'08"E	35.54'
L44	S54°26'02"E	41.34'
L45	S08°58'45"E	20.34'
L46	S20°14'43"W	31.49'
L47	S18°07'40"E	30.42'
L48	S00°53'24"E	40.94'
L49	N54°54'01"E	36.48'
L50	S78°13'08"E	17.05'
L51	N27°16'46"E	27.80'
L52	N07°04'21"E	30.91'
L53	N02°25'52"W	18.69'
L54	S86°28'45"E	22.18'
L55	N47°57'40"E	25.47'
L56	N38°27'33"E	13.16'
L57	N59°53'38"E	37.87'
L58	S74°12'33"E	88.51'
L59	S45°38'51"E	23.52'
L60	S53°41'28"E	20.94'

LINE TABLE		
LINE	BEARING	LENGTH
L61	S53°11'36"E	30.39'
L62	S35°06'40"E	29.71'
L63	N89°11'07"E	24.40'
L64	N39°09'51"E	32.66'
L65	N15°44'57"E	31.72'
L66	S51°28'59"E	35.05'
L67	N69°04'09"E	45.53'
L68	N62°09'38"E	57.44'
L69	N84°27'14"E	43.94'
L70	S74°22'21"E	64.14'
L71	S86°41'48"E	43.25'
L72	S61°34'58"E	58.86'
L73	S04°50'35"E	20.15'
L74	S03°32'14"W	30.71'
L75	S24°22'25"E	40.97'
L76	S17°30'26"E	43.96'
L77	S28°17'52"E	16.02'
L78	S47°42'45"E	37.64'
L79	S18°51'41"W	29.62'
L80	S22°06'09"E	24.04'

LINE TABLE		
LINE	BEARING	LENGTH
L81	S01°08'33"E	23.22'
L82	S13°18'57"E	25.85'
L83	S43°03'53"E	19.89'
L84	S27°00'09"E	35.03'
L85	S18°42'31"W	29.58'
L86	S04°35'52"E	29.34'
L87	S08°59'44"W	35.11'
L88	S13°51'57"E	36.02'
L89	S12°29'29"W	21.18'
L90	S01°55'27"E	24.99'
L91	S31°18'51"W	25.13'
L92	S03°00'06"E	20.83'
L93	S10°40'07"W	17.78'
L96	S82°35'08"W	24.81'
L97	N41°37'50"W	26.38'
L98	S74°47'34"W	15.53'
L99	S82°20'44"W	23.64'
L100	N27°57'03"W	44.62'
L101	N53°27'12"W	22.27'
L102	N42°54'28"W	25.92'

LINE TABLE		
LINE	BEARING	LENGTH
L103	N59°47'20"W	29.66'
L104	N71°25'01"W	33.75'
L105	N43°40'43"W	35.91'
L106	S83°38'46"W	40.09'
L107	N63°02'18"W	33.47'
L108	N60°56'58"W	35.75'
L109	N37°59'03"W	29.57'
L110	N20°08'59"W	24.52'
L111	N18°21'47"W	17.14'
L112	N05°42'40"W	34.78'
L113	N43°35'09"W	36.27'
L114	N15°09'10"W	26.50'
L115	N24°43'13"W	33.75'
L116	S55°47'01"W	49.70'
L117	S87°03'41"W	39.32'
L118	S25°05'37"W	23.65'
L119	S06°33'07"E	39.31'
L120	S44°22'09"W	44.18'
L121	N52°38'55"W	24.59'
L122	N58°43'54"W	26.81'

LINE TABLE		
LINE	BEARING	LENGTH
L123	S60°06'20"W	27.15'
L124	S33°55'12"W	47.80'
L125	S47°46'09"W	35.17'
L126	S00°28'35"W	33.08'
L127	S44°12'13"W	23.66'
L128	N80°50'59"W	26.72'
L129	S44°38'11"W	26.74'
L130	S33°11'19"W	28.86'
L131	N59°14'05"W	58.11'
L132	S66°25'19"W	24.24'
L133	S21°07'04"E	26.17'
L134	S14°52'35"W	33.50'
L135	S21°51'45"W	38.29'
L136	N88°14'12"W	71.16'

**WETLAND 4  
SKETCH AND DESCRIPTION**



12800 University Drive, Suite 175  
Fort Myers, Florida 33907  
Phone: (239) 597-0575  
Fax: (239) 597-0578  
LB No.: 6952

JOB NUMBER	REVISION	SECTION	TOWNSHIP	RANGE	SCALE	DATE	DRAWN BY	FILE NAME	SHEET
190136.02.00	(01)	18	43S	26E	1"=###'	02/09/22	NJM	00-WL4 SD	5 OF 5



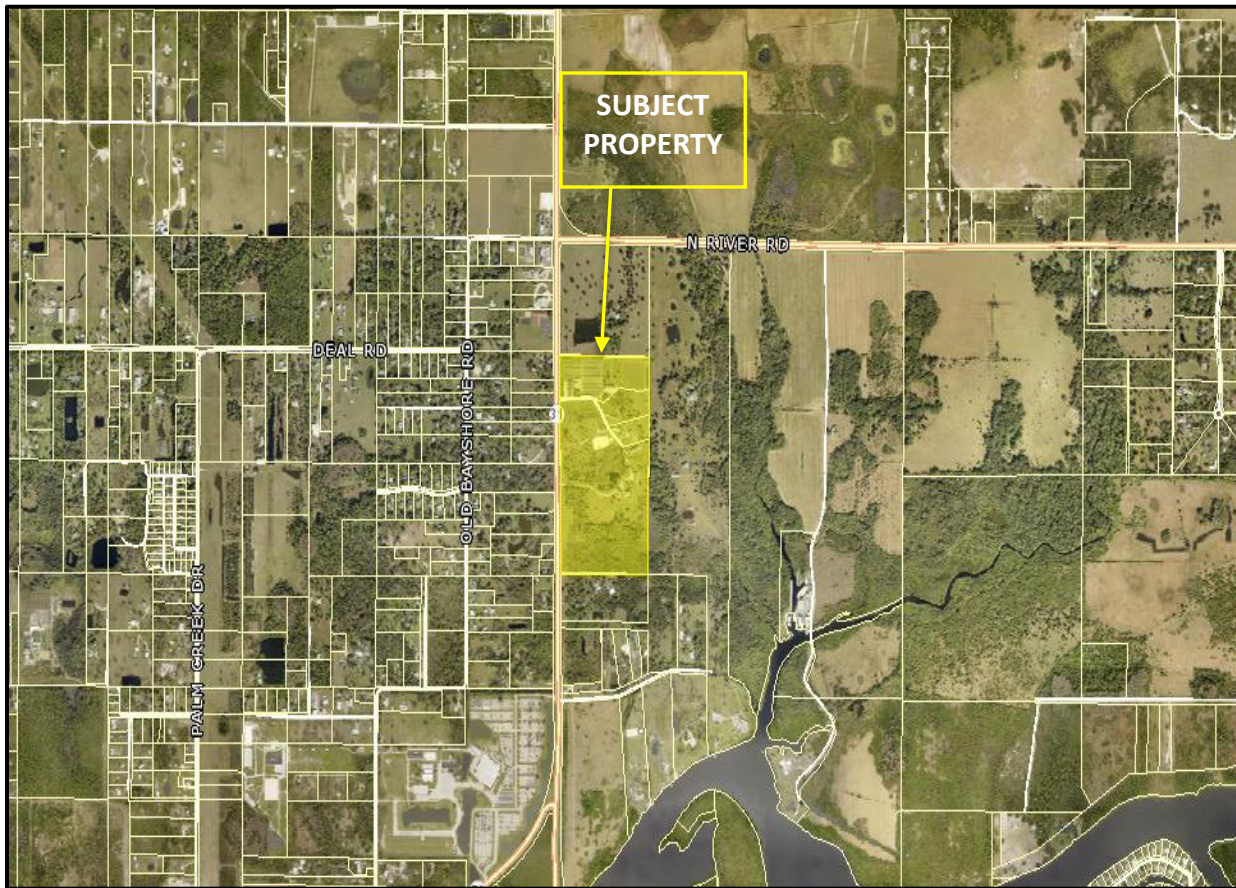


**GREENWELL SR31**  
**Comprehensive Plan Map Amendment (CPA)**  
**EXHIBIT M11**  
**Lee Plan Analysis**

**BACKGROUND AND REQUEST**

The subject property is located in North Fort Myers, FL, (Unincorporated Lee County) just south of the intersection of North River Road and State Route (SR) 31 (See Figure 1.). The property consists of 76.82+/- acres encompassing four (4) parcels, STRAP No's.:

**18-43-26-00-00001.0000; 18-43-26-00-00001.0200; 18-43-26-00-00001.0180;  
18-43-26-00-00001.0190.**



**Figure 1. Subject Property Location Map**

The property has a Future Land Use designation of Rural and Wetlands, is zoned Agricultural (AG-2) and current uses include a fresh produce/"u-pick" farm and agritourism establishment, residential homesteads, pasture, open space and vacant land.

The proposed comprehensive plan map amendment seeks to change the FLUM category from Rural and Wetlands to Outlying Suburban and Wetlands. This amendment will allow Community Commercial uses and intensities, and residential development at a maximum density of 3 dwelling units per acre. As will be outlined in the forthcoming companion Planned Development rezoning application, the Applicant intends to develop a maximum of 400,000 square feet of community commercial uses on approximately 33.3 acres and a maximum on 125 units (3du/ac) on the remaining 43.5 acres.

The subject property is located in an area of Lee County that is rapidly changing, and where current and future land use arrangements, existing and planned development and public services and infrastructure support a natural evolution to a suburban development pattern. The property is surrounded by growth and development on all sides. To the north, Babcock Ranch is booming and maturing into a substantial new community. It will be home to approximately 50,000 people and has spurred the recent development of support goods and services in the area, including a veterinary clinic and convenience store and gas station uses near the intersection of SR 31 and North River Road. To the south, suburban growth patterns are extending east along SR 80 and pushing up SR 31 where Sweetwater Landing Marina and the neighboring Boathouse Tiki Bar and Grill provide service and entertainment to boaters and area-wide residents and where residential development is planned on the southeast corner of SR 31 and the Caloosahatchee River. To the west, the Bayshore corridor is seeing continued residential development and interest, including new communities and proposed land use changes converting land from Rural to Sub-Outlying Suburban. Additionally, there are plans to redevelop the Lee County Civic Center located at the intersection of Bayshore and SR31. To the east, petitions have been submitted to allow the development of Owl Creek, a 385-unit community extending from North River Road to the Caloosahatchee River.

The subject property also directly abuts SR 31 which is a strategically significant roadway that will eventually be improved to six lanes to meet the anticipated growth in the area. SR 31 is an Emerging Strategic Intermodal System (SIS) facility which enhances regional connectivity with Charlotte and Desoto Counties and provides access and capacity to growing residential and commercial uses regionally. The Lee MPO has identified SR 31 as an important regional north-south transportation corridor. The proposed improvements to SR 31 and its classification as an Emerging SIS facility represents an acknowledgement of the growth that is occurring in that area and an understanding that there will be intensification of land uses along that corridor over time.

Moreover, significant public infrastructure investment in this corridor signals the natural extension of urban services and infrastructure to this area. Public utilities from Babcock Ranch extend to North River Road, slightly north of the subject property. To the south, Lee County Utilities (LCU) services extend to the Lee County Civic Center, and Florida Governmental Utility Authority (FGUA) has services along

Bayshore Rd. Borrowing terminology from the internet/wireless communication industry, the subject property represents the “last mile.” Extending public infrastructure to this area and allowing suburban land uses and densities to support this investment is an efficient and economical use of public funds and represents a logical extension of public facilities and suburban land use patterns.

Lastly, in recent years, the Lee Plan was amended to include Policy 6.1.2 which supports Neighborhood Commercial Uses within half a mile of SR 31 and Community Commercial where properties abut two major roads. As such, it is anticipated that higher intensity Community Commercial uses will eventually be developed at the intersection of SR31 and North River Road and SR 31 and Bayshore Road. If not for the proposed amendment, the subject property would essentially be a Rural enclave “sandwiched” between two higher intensity areas. The Outlying Suburban FLU category will allow uses consistent with Policy 6.1.2 and promote compatibility along the corridor.

In addition to the proposed Future Land Use Map amendment, changes to supporting maps and tables will also be needed, including Lee Plan Map 4-A: Lee County Utilities Future Water Service Areas and Lee Plan Table 1(b)Year 2045 Allocation.

The following narrative addresses compliance and consistency with the Lee Plan and demonstrates how the proposed amendment supports and/or furthers specific goals, objectives or policies therein.

**LEE PLAN:**

**FUTURE LAND USE ELEMENT**

As discussed above, the area surrounding the subject property and the SR 31 corridor are in transition. There is significant development activity occurring along Bayshore Road which is changing and influencing the character of the area from a large lot/rural form of development to a more suburban character. Much of the land south of Bayshore Road falls within the Sub-Outlying Suburban FLU category which allows 1 unit per acre. Additionally, Owl Creek, west of the subject property is requesting a map amendment to Sub-Outlying Suburban.

The area surrounding SR 31 south of the Caloosahatchee River is designated Suburban and even Urban Community at the intersection with SR 80. The Suburban category allows for a standard maximum density of 6 units per acre, and a maximum total density of 8 units per acre through the use of TDU’s. The Urban category allows a maximum standard density of 10 units per acres and maximum total density of 15 through TDU’s and other density bonuses. While much of the land along this corridor remains vacant, development at higher densities and intensities is anticipated based up recent construction and entitlement activity.

To the north of the subject property, Babcock Ranch is designated New Community and approved for approximately 19,500 units within Lee and Charlotte Counties. As mentioned above, this new town will have close to 50,000 residents at build out and will provide and some supporting commercial uses.

In light of growth elements surrounding the subject property, it is reasonable to anticipate continued growth and intensification of development along the SR 31 corridor which will create conditions that support higher density and intensity infill development.

The proposed map amendment the companion mixed use planned development request will be consistent with Objective 1.1 (FUTURE URBAN AND SUBURBAN AREAS) and corresponding Policy 1.1.6 for the Outlying Suburban future land use category. The concurrent planned development will propose a mixed-use development at densities and intensities consistent for the Outlying Suburban category and consistent with properties abutting a major roadway. The proposed commercial uses will provide goods and services for the surrounding community and will offer a transitional land use between this busy roadway and proposed residential development to the east. A clustered residential development at 3 units per acre will allow for different product types and price points, which will help support housing diversity and affordability.

The request is also consistent with Objective 1.5 (Wetlands) and its corresponding applicable policies outlining the necessary protections and delineation of environmentally sensitive areas. An Environmental Impact Analysis report has been conducted for the subject property and is included with this submittal. In accordance with the provisions listed under Objective 1.5 with regards to the use of the unified state delineation methodology, the report has properly delineated all wetlands and identified 25.18 acres of surveyed wetlands depicted and described in Exhibit M12. The proposed Future Land Use Map (Exhibit M4) also accurately reflects all delineated wetland areas. Any action associated with this amendment will continue to adhere to the provisions listed within the Lee Plan to protect these environmentally sensitive lands.

### **Growth Management**

The request is consistent with Objective 2.1 (DEVELOPMENT LOCATION), and the corresponding applicable Policies 2.1.1 and 2.1.2, which outline the intent to promote contiguous and compact growth patterns and contain urban sprawl. As previously stated, although within a Rural FLU category, adequate urban services exist in very close proximity to the subject property and will be extended to the property as a condition of approval. The extension of urban services along SR 31 and the Outlying Suburban designation represents a development intensification that is a logical extension of existing development patterns and an efficient use of public infrastructure. The property is in close proximity to proposed Sub-Outlying Suburban to the east and west, Suburban lands to the south, and Babcock Ranch (New Community) to the north. The proposed amendment will not result in urban sprawl, which is defined in the Lee Plan as *“The uncontrolled, premature, or untimely expansion and spreading out of urban levels of density or intensity into out-lying, non-urban areas.”* To the contrary, the significant improvements to SR 31, the surrounding growth and the availability of urban services support controlled development along this significant roadway corridor. The proposed amendment and resulting planned development are also consistent with “infill development” as defined in the Lee Plan and Land Development Code, and represents the “timely expansion and spreading out of urban levels of density and intensity” to a corridor book-ended by Babcock Ranch to the north and Suburban development along SR 80 to the south.



The request is consistent with Objective 2.2 (DEVELOPMENT TIMING), which outlines the intent to direct new growth to future urban (suburban) areas where adequate public facilities exist or are assured and where compact and contiguous development patterns can be created. The existing residential and limited commercial uses surrounding the property, and adequate urban services justify the timing of this map amendment, which will allow for community commercial uses and increased density that will help fulfill housing needs for this area of Lee County. A separate attached Public Facilities Analysis (Exhibit M14) and letters of determination (Exhibit M17) of existing support facilities (Fire, EMS, Law Enforcement, Solid Waste, Mass Transit, Schools, and Utilities) further emphasize the adequacy of timing and support in place for the purposed development.

The project will comply with Objective 2.5 (HISTORIC RESOURCES). A Historical Resources Impact Analysis included with this submittal (Exhibit M13) delineating the location of the property regarding historical and culturally sensitive areas in Lee County. The subject property was found to be clear of any cultural or historical resources.

#### **General Development Standards**

The request is consistent with Standard 4.1.1 (WATER), AND 4.1.2 (SEWER), and 4.1.4 (ENIRONMENTAL FACTORS).

The subject property is currently outside of the LCU service areas. However, water and sewer services can easily be extended to the subject property from the Lee County Civic Center. As part of this amendment, the Applicant is also requesting a modification to Maps 6 & 7 of the Lee Plan and working with Lee County to extend water and sewer service to the subject property.

Consistent with Standard 4.1.4, an Environmental Impact Analysis Report is included with this submittal. The report analyzes environmentally sensitive areas of the site. The concurrent planned development will utilize a clustered development pattern ensuring the development is well-integrated, properly designed, functionally interconnected, and not impacting the natural and most environmentally sensitive areas of the site.

#### **Residential Land Uses**

Goal 5 (RESIDENTIAL LAND USES) outlines the need to “accommodate the projected population of Lee County in the year 2045 in appropriate locations, guided by the future land use map, and in attractive and safe neighborhoods with a variety of price ranges and housing types.” According to the Bureau of Economic and Business Research (BEBR), the medium range population projection for Lee County anticipates a population increase from 829,300 in 2025 to 1,038,500 by 2045. This influx of 209,200 residents stresses the need for development that improves housing diversity and affordability in a rapidly growing area of Lee County.

The proposed request and companion rezoning will be in the form of a planned development and will ensure the clustered development and appropriate open space, buffering, landscaping, and recreational amenities as directed by Policy 5.1.6.

The request is consistent with Policy 5.1.2, which outlines the intent to prohibit residential development where physical constraints or hazards exist. The majority of the subject property, approximately 66.5 acres, is within the Coastal High Hazard Area as based on and delineated in Map 5-A of the Lee Plan. Through the concurrent planned development process, the proposed mixed-use development consisting of approximately 125 dwelling units will utilize a clustered development pattern providing the necessary environmental, historical, water quality, and infrastructure enhancement measures needed to ensure proper functionality and design.

The proposed project, as detailed in the concurrent MPD application, will provide goods and services to meet the needs of the local community and will create an intensity and density gradient from SR 31 to the surrounding properties. Additionally, the proposed project will be designed in such a way that the commercial uses will be located along SR 31 and the residential development will be clustered on the eastern side of the property. The project will include perimeter setbacks, open space and buffers to ensure compatibility with surrounding uses and consistency with Policy 5.1.5 of the Lee Plan, to “protect existing and future residential areas from any encroachment of uses that are potentially destructive to the character and integrity of the residential environment” and Policy 5.1.6, which calls for development regulations requiring high-density, multi-family, cluster, and mixed-use developments to have open space, buffering, landscaping, and recreation areas appropriate for their density and design.

Policy 5.1.7 requires that community facilities (such as park, recreational, and open space areas) in residential developments to be functionally related to all dwelling units and easily accessible via pedestrian and bicycle pathways. The proposed mixed-use development will provide connectivity between the commercial and residential components and will provide an amenity center facility which will be centrally located and easily accessible by all residents. The project will have a network of sidewalks and pathways and the required open space and preserves will be integrated into the overall design to enhance green space, community aesthetics and the separation and buffering of uses.

### **Commercial Land Uses**

In compliance Goal 6 of the Lee Plan, Community Commercial resulting from the proposed Outlying Suburban category represents a well-planned and appropriate location for commercial uses. As discussed above, the subject property is along a major arterial planned for expansion to six-lanes and surrounded by existing and planned development.

The proposed map amendment and resulting mixed-use planned development will provide commercial uses that are consistent with:

- The intent behind Policy 6.1.2 which allows commercial uses within one quarter mile of SR 31 between North River Road and the Caloosahatchee River and further allows Community



Commercial uses when development is in the form of a planned development. Notwithstanding the requirement to be located at the intersection of two arterial roadways, the subject property is located within this delineated higher intensity segment and is of sufficient size to provide a commercial center that can easily accommodate Community Commercial Uses with safe and functional access.

- Policy 6.1.3 which requires developments to be designed and arranged in an integrated and cohesive unit which is described and illustrated in the companion rezoning application.
- Policy 6.1.4 which requires demonstration of compatibility with surrounding uses and ability to connect to or extend public services and facilities.
- Policy 6.1.5 which requires commercial uses to be designed to protect the carrying capacity of roads and streets.
- Policy 6.1.6 requiring adequate and appropriate landscaping, open space and buffering which are clearly depicted on the companion rezoning petition and Master Concept Plan.
- Policy 6.1.7 which prohibits premature, scattered or strip development. As evidenced by policy 6.1.2, this segment of SR 31 has been identified as an area appropriate for future commercial development

### **Mixed Use**

The proposed amendment and companion rezoning are consistent with Goal 11, which is to encourage mixed-use developments that integrate multiple land uses, housing types, and provide greater connectivity and reduced trip lengths.

The amendment is also consistent with Objective 11.1., which allows and encourages mixed use development at appropriate locations where sufficient infrastructure exists to support the development. As discussed previously, improvements to SR 31, the proximity of existing utilities and the commitment to work with Lee County/FGUA to extend utilities to the property, make the subject property appropriate for the proposed land use change.

### **COMMUNITY PLANNING**

The subject property is identified within the Lee Plan Map 2-A as being within the Northeast Lee County Planning Community. The request is consistent with Goal 27: Northeast Lee Community Plan. The proposed amendment and companion planned development recognize the heritage and rural character of the area and desire to balance a healthy economy and preserve natural resources. The requests propose to locate commercial uses and clustered residential development along a major arterial roadway where the proposed intensities and densities are appropriate. The commercial component will support the local, rural-based economy and provide goods and services that will alleviate the need for longer vehicular trips. The proposed residential development will create a density gradient between commercial uses and lower density Outlying Suburban, Sub-Outlying Suburban, and Rural areas. Although the proposed project does not seek to amend the LDC, the project will strive to provide a rural mixed-use project that is connected to and compatible with adjacent areas as described in 27.1.3. The proposed

planned development will protect environmentally sensitive lands as outlined in Objective 27.3. Moreover, the proposed project intends to provide commercial uses that support the rural and agricultural character of the area and foresees potential uses such a Rural King, a lumber yard, agricultural equipment sales and repair, a nursery, and a local grocer that can showcase locally grown food products.

Consistent with Policy 27.4.3 the project will meet indigenous preserve requirements and preserve the only onsite indigenous vegetation contiguous to offsite wetlands that connect to Owl Creek. While most of the existing native habitat surrounding the subject property is fragmented, the connection to abutting wetlands can provide some wildlife connection to Owl Creek and the Caloosahatchee River

In compliance with Objective 29.1 and 29.3.3, the proposed project will embrace and enhance the rural character of the North Olga community and will work with the community to define an architectural aesthetic that is consistent with the community character. The proposed project will utilize a consistent landscaping and architectural style for all building and will comply with the applicable design standards within the land development code.

Consistent with Policy 29.2.1, the companion planned development “will provide a mix of unit types and flexible lot sizes to allow clustering, affordability, preservation of open space, natural assets, and diversity of choice within the community. The planned development will also meet or exceed LDC native habitat requirements by preserving approximately 14 acres of wetland and upland native habitat, consistent with Policy 29.7.2. Moreover, the proposed preserve along the southern portion of the project contains high quality wetlands and is contiguous to off-site wetland habitat.

### **TRANSPORTATION ELEMENT**

A Traffic Study prepared by TR Transportation is included in this submittal as Exhibit M15. In summary, the long-range link Level of Service analysis indicates that the addition of the trips as a result of the proposed amendment to the projected 2045 volumes:

- Will not cause any roadway link to fall below the recommended minimum acceptable Level of Service thresholds as recommended in Policy 37.1.
- 1 of the Lee Plan.

The results of the short-range link Level of Service analysis indicates that the addition of the trips as a result of the proposed amendment to the projected 2026 volumes:

- Will only cause SR 31 from SR 78 to SR 80 to fall below the minimum acceptable Level of Service standards. However, FDOT is currently conducting a PD&E Study on SR 31 to widen this roadway segment to a four-lane facility, which would alleviate this projected deficiency. Additionally, this segment of SR 31 was shown to exceed the adopted capacity threshold by only 25 peak hour peak direction trips.

- No modifications are necessary to the Short Term Capital Improvement Plan or the Long Range Transportation Plan to support the proposed amendment.

The Transportation Element also provides objectives and policies, such as, Objective 39.2 and 39.6 to ensure land use and transportation coordination resulting in increased mobility options and improving all modes of transportation. The concurrent planned development ensures consistency with Policy 39.2.2 by incorporating a network of sidewalks and pathways to interconnect commercial and residential uses and encourage pedestrian, bicycle modes of transportation.

Consistent with Policies 39.6.1, 39.6.2, and 39.6.3, the proposed planned development, at time of Development Order, will ensure all necessary traffic management infrastructure and pedestrian/bicycle connections are in place.

## **COMMUNITY FACILITIES & SERVICES ELEMENT**

### **Potable Water**

The subject property is not currently located within the Lee County Utilities (LCU) service area based on the most recent Lee County Utilities Water Franchise Area Map, dated May 29, 2019. The Lee County Utilities Potable Water and Wastewater Letter of Availability, dated November 8, 2021, indicates that a potable water main is located on Bayshore Road, approximately 1 mile west of SR 31. The letter also indicates a Lee County Comprehensive Plan Amendment will be required as the subject property is not located within the Lee County Utilities Future Service Area per Lee Plan Map 4-A. It is through this Comprehensive Plan Map Amendment application that the applicant will be amending the Lee County Utilities Future Water Service Areas map (Lee Plan Map 4-A) to place the property within LCU's service area. The applicant is also committed to working with Lee County to ensure system enhancements are made to ensure water service. Once adopted, Lee Plan Map 4-A will identify the subject property as being within the Lee County Utilities Future Water Service Area and thus able to receive water services consistent with the Lee Plan.

Consistent with Policies 53.1.2 and 95.1.3, and pursuant to the Letter of Availability and supporting data presented as Exhibit M16, it has been determined that LCU has sufficient capacity to meet the needs of the proposed development.

### **Sanitary Sewer**

The subject property is not located within any current sanitary sewer service franchise area or future service area based on Lee Plan Map 4-B. The Lee County Utilities Potable Water and Wastewater Availability letter, dated November 8, 2021, indicates that sanitary sewer lines "are not in operation adjacent" to the subject property. For service to be provided, LCU indicates that developer funded system enhancements and a Lee County Comprehensive Plan Amendment will be required. LCU also states that they have sufficient capacity to provide sanitary sewer service based on the proposed project parameters.

Even though LCU indicates that they have sufficient capacity to provide sanitary sewer service via the City of Fort Myers North Water Reclamation Facility, the letter of availability also indicates the nearest wastewater mains are located on the south side of the Caloosahatchee River along SR 80/Palm Beach Blvd., which may pose significant connection obstacles. As an alternative to connecting to LCU's infrastructure, the applicant is also coordinating with Florida Governmental Utility Authority (FGUA). FGUA operates wastewater lines in the vicinity of the subject property (approximately 2.75 miles west along Bayshore Rd.), and the applicant is seeking to obtain a letter of availability demonstrating FGUA also has sufficient treatment capacity to accommodate the proposed mixed-use development project.

Either way, the subject property can be served by LCU/City of Fort Myers existing facilities and the needs of the proposed development are expected to stay well within their wastewater treatment capacity. The 2020 Report indicates an overall 2024 projected capacity of 34.6 million gallons per day (MGD). Therefore, the proposed amendment and resulting project will be consistent with Policies 56.1.2 and 95.1.3 of the Lee Plan.

### **Surface Water Management**

The proposed amendment and companion planned development is consistent with Lee County's efforts to address proposed development and potential impacts to watersheds. A stormwater management system will be provided for the property and will benefit the public through clearly defining stormwater treatment methods, establishing maintenance accountability, and providing runoff attenuation consistent with Objective 60.1 and Policy 60.1.1. Treated runoff from the developed site will discharge to adjacent tidal creeks and rivers. The Lee County Public Facilities 2020 LOS and Concurrency Report (2020 Report) indicates that all watersheds within the county were studied and concluded that no evacuation routes located within these watersheds are expected to be flooded for more than a 24-hour period. Per the 2020 Report, Lee County states that all new developments receiving approval from SFWMD and in compliance with appropriate standards will be deemed concurrent with the Lee Plan's surface water management level-of-service standards.

The proposed development will seek and obtain all applicable South Florida Water Management District approvals, as well as comply with all Florida Administrative Code Chapter 62-330 standards to ensure consistency with the stated LOS standards per Policy 95.1.3 of the Lee Plan. Additionally, through the utilization of clustered development, the proposed development will help ensure preservation of existing waterways and wetland habitats consistent with Policy 60.1.2.

Objective 60.4 outlines the intent to incorporate natural systems into surface water management systems to improve water quality, air quality, water recharge/infiltration, water storage, wildlife habitat, recreational opportunities, and visual relief. The proposed development will provide Florida Friendly Landscaping vegetation, retention/detention lakes, and preserved wetlands. It will also provide a surface water management system that will incorporate the existing wetland systems; thus, complying with policies 60.4.1, 60.4.2, and 60.4.3.

Consistent with Policy 61.3.6, a surface water management system will be provided within the proposed development area, which will be designed to meet or exceed Lee County and the South Florida Water Management District standards. Post-development runoff conditions will be consistent with the pre-development conditions. Additionally, stormwater runoff from the developed site may discharge to the SR 31 right-of-way, which will then be required to meet Florida Department of Transportation drainage criteria. This drainage criteria includes demonstrating the post-development discharge rates will be less than the pre-developed discharge rates as well as maintaining existing drainage patterns. The required water quality volume and attenuation as prescribed by the South Florida Water Management District will also be provided within the stormwater management system. Homeowners' documents for the project will include information on the operation and maintenance of the stormwater management system as well as best management practices.

#### **PARKS, RECREATION & OPEN SPACE ELEMENT**

The proposed project will meet or exceed open space requirements. Through clustered design and site layout, open spaces will include preserved wetlands, passive recreational areas, and lakes and will be designed to provide separation and buffering from adjacent properties consistent with Goal 77 – requiring new development to provide open space for “improved aesthetic appearance, visual relief, environmental quality, preservation of existing native trees and plant communities, and the planting of required vegetation.” Moreover, the proposed community design will be consistent with Policy 77.3.4 by incorporating “large, contiguous open spaces areas.”

#### **CONSERVATION & COASTAL MANAGEMENT ELEMENT**

Based on and delineated in Map 5-A of the Lee Plan, the majority of the subject property, approximately 66.5 acres, is within the Coastal High Hazard Area (CHHA) but not a Coastal Building Zone. Through the concurrent planned development process, the proposed mixed-use development consisting of approximately 125 dwelling units will utilize a clustered development pattern providing the necessary environmental, historical, water quality, and infrastructure enhancement measures needed to ensure proper functionality and design. Consistent with Policy 101.1.1 the proposed planned development will meet or exceed indigenous preserve requirements, will provide a state-of-the-art water management system that will meet all SFWMD requirements and will ensure that development elevations meet FEMA requirements to protect against flooding. While Policy 101.1.2's intent is to protect sensitive coastal habitats along the gulf, the proposed project will preserve onsite wetlands contiguous to abutting wetlands that connect to Owl Creek and the Caloosahatchee.

Consistent with Policy 101.1.4, the proposed project will provide a Hurricane Evacuation Plan at time of Development Order demonstrating compliance with hurricane evacuation criteria.

Consistent with Policy 101.3.2, the proposed development plan will ensure development within the CHHA is located within upland areas except for public facilities, such as water management and transportation.

An environmental assessment was conducted, and a report by Passarella & Associates, Inc., dated November 2021 is attached as part of this submittal (Exhibit M12) to ensure overall consistency with Goal 123 of the Lee Plan. More specifically, the project is consistent with Policy 123.1.7, as the proposed clustered development, enabled through the concurrent planned development rezoning, will provide designated preserve areas for potential future area wide conservation efforts. These preserves will protect high quality wetlands, plant communities, and indigenous uplands.

The planned development will be subject to a preserve management plan, as approved by Lee County, to ensure the appropriate control of exotics and perpetual maintenance of the preserve areas that are placed under conservation easements to SFWMD in accordance the Environmental Resource Permit (ERP) requirements. Thus, the project is consistent with the intent of Policies 123.2.8 and 123.2.11.

Confirming consistency with Policy 123.2.15 and based on the environmental assessment report (Exhibit M12), no Lee County defined rare and unique upland habitat exists on the subject property.

A Lee County Protected species survey was conducted on the subject property on November 3, 2021. It was observed during the survey that no protected species were on the property. With that, Policy 123.8.1 provides for methods to address the protection of Gopher Tortoises that may potentially occur within the Greenwell SR31 project area. After construction of the project is completed, there will likely not be enough suitable gopher tortoise (*Gopherus polyphemus*) habitat remaining on-site for the long-term survivability of the species. Therefore, consistent with Policy 123.8.1, the applicant will obtain a permit from the Florida Fish and Wildlife Conservation Commission (FWC) to relocate any found gopher tortoises, if found, to a protected recipient site prior to site clearing activities. The recipient site will be approved by the FWC and managed in perpetuity, consistent with FWC's 2012 Gopher Tortoise Management Plan.

Lee Plan Goal 124 provides overarching language to ensure adequate maintenance and enforcement for any development in wetlands that is cost-effective, complements federal and state permitting processes, and protects the fragile ecological characteristics of wetland systems. The majority of the site (63.3%) contains highly degraded land uses including residential, commercial, improved pasture, row crops, Brazilian pepper, ditch, and disturbed lands that are not intended to remain. The Greenwell SR31 project will utilize a cluster development pattern to reduce any negative impacts to high quality wetlands and no development impacts will occur until the ERP permit has been issued by the state or SFWMD. The development, as it moves through the permitting process, will be reviewed by the South Florida Water Management District and as a result will be consistent with overall Goal 124, and Policies 124.1.1 and 124.1.2.

The proposed planned development will be consistent with Lee Plan Goal 125, Objective 125.1, and Policies 125.1.1 through 125.1.6. The proposed development will not generate pollution and will meet all conditions and requirements of Lee County's Wellfield Protection Ordinance No. 07-35 per Policy 125.1.6.

It is important to note that in 1990, the FDEP developed and implemented the State Water Resource Implementation Rule (Chapter 62-40 F.S.). The Rule codifies implementation guidelines for the State's stormwater program under 62-40.431. As stated in Ch. 62-40.431 2(a) "The primary goals of the state's stormwater management program are to maintain, to the maximum extent practical, during and after construction and development, the pre-development stormwater characteristics of a site; to reduce stream channel erosion, pollution, siltation, sedimentation and flooding; to reduce stormwater pollutant loadings discharged to waters to preserve or restore designated uses..."

The Applicant is of the opinion that the criteria set forth in Chapter 62-40, applied through the South Florida Water Management District's Environmental Resource Permitting (ERP) program, provides reasonable assurance that the surface water resources of Lee County will be protected and maintained, and meets the intent of Lee Plan Goal 125.

Consistent with Policy 126.1.4, the proposed mixed-use planned development will include an engineered surface water (stormwater) management system, based on the rules, standards, and criteria of the SFWMD ERP program, and be consistent with the criteria of Part IV of Chapter 373, Florida Statutes. Through the elimination of the existing conveyance features, and construction of the stormwater management system, predevelopment water resources conditions (shallow groundwater and surface water) will be maintained, or otherwise enhanced. The attenuation of stormwater flows through the creation of wet detention areas (lakes), results in surface water supplies being seasonally stored, thereby improving recharge potential to the underlying Water Table Aquifer and enhancing shallow groundwater levels. The features also provide improved surface water quality treatment, provide wildlife habitat, and can be used to supplement irrigation supplies. Therefore, the development design not only maintains, but potentially improves existing water resource conditions.

### **HOUSING ELEMENT**

Goal 135 outlines the need to provide adequate housing for existing and future residents of Lee County. Objective 135.1 requires the county to work with private and public housing providers to ensure that the additional dwellings needed are provided in a variety of types, costs, and locations. Based on our analysis, the county will need an additional 114,927 units by 2025, of which 39,637 will be needed in unincorporated Lee County. The proposed comprehensive plan amendment and companion planned development will allow for up to 125 new housing units to help reach Objective 135.1 and consistency with Policy 135.1.9.

### **PLANNING COMMUNITY ACREAGE ALLOCATION - TABLE 1(b) ANALYSIS & EFFECT ON POPULATION**

Lee Plan Policy 1.6.5 outlines, by reference Lee Plan Map 1-B and Table 1(b), the “proposed distribution, extent, and location of generalized land uses through the Plan’s horizon.”. This petition proposes an amendment to Table 1(b) to reflect the proposed Future Land Use Map (Lee Plan Map 1-A) change. Please refer to the attached amended Table 1(b) addressing the reallocation of lands from the Rural Future Land Use category to the Outlying Suburban category.

The proposed map amendment will not negatively affect the population projections for Lee County. Based on the United States Census Bureau’s Quick Facts database, there are 2.64 persons per household and an overall population of 618,754 (2010 Census) in Lee County. The subject property under the proposed map amendment and concurrent MPD rezoning application, which will allow a maximum of 125 units, could accommodate approximately 330 people (125 units x 2.64 persons per household).

According to the University of Florida’s Bureau of Economic and Business Research, the projected 2030 population in Lee County will be 904,700 and 1,010,900 in 2040. Considering these projections and the previously stated housing needs from Objective 135.1, over 100,000 dwelling units will be needed within the next 5 to 10 years. The proposed map amendment and concurrent residential planned development rezoning will provide 125 residential dwelling units to support the future population growth in Lee County, in a quality mixed-use development that is compatible and complementary to the surrounding community.



**TABLE 1(b)  
YEAR 2045 ALLOCATIONS**

Revised 2022-02-17

Future Land Use Category	Unincorporated County	Planning District										
		District 1 Northeast Lee County	District 2 Boca Grande	District 3 Bonita	District 4 Fort Myers Shores	District 5 Burnt Store	District 6 Cape Coral	District 7 Captiva	District 8 Fort Myers	District 9 Fort Myers Beach	District 10 Gateway / Airport	
<b>Residential By Future Land Use Category</b>												
Intensive Development	1,483	-	-	-	17	-	21	-	238	-	-	-
Central Urban	13,838	-	-	-	207	-	-	-	230	-	-	25
Urban Community	22,739	813	453	-	475	-	-	-	-	-	-	150
Suburban	14,913	-	-	-	1,950	-	-	-	80	-	-	-
Outlying Suburban	<del>3,661</del> 3,648	<del>38</del> 25	-	-	490	13	3	429	-	-	-	-
Sub-Outlying Suburban	1,731	-	-	-	330	-	-	-	-	-	-	227
Commercial	-	-	-	-	-	-	-	-	-	-	-	-
Industrial	15	-	-	-	-	-	-	-	-	-	-	6
Public Facilities	-	-	-	-	-	-	-	-	-	-	-	-
University Community	503	-	-	-	-	-	-	-	-	-	-	-
Destination Resort Mixed Use Water Dependent	8	-	-	-	-	-	-	-	-	-	-	-
Burnt Store Marina Village	2	-	-	-	-	2	-	-	-	-	-	-
Industrial Interchange	-	-	-	-	-	-	-	-	-	-	-	-
General Interchange	114	-	-	-	-	-	-	-	-	-	-	15
General Commercial Interchange	-	-	-	-	-	-	-	-	-	-	-	-
Industrial Commercial Interchange	-	-	-	-	-	-	-	-	-	-	-	-
University Village Interchange	-	-	-	-	-	-	-	-	-	-	-	-
New Community	2,104	1,115	-	-	-	-	-	-	-	-	-	989
Airport	-	-	-	-	-	-	-	-	-	-	-	-
Tradeport	3	-	-	-	-	-	-	-	-	-	-	3
Rural	<del>7,534</del> 7,764	<del>2,201</del> 2,431	-	-	800	730	-	-	-	-	-	-
Rural Community Preserve	3,517	-	-	-	-	-	-	-	-	-	-	-
Coastal Rural	1,338	-	-	-	-	-	-	-	-	-	-	-
Outer Island	233	2	4	-	1	-	-	169	-	-	-	-
Open Lands	2,186	153	-	-	-	257	-	-	-	-	-	-
Density Reduction/ Groundwater Resource	6,974	131	-	-	-	-	-	-	-	-	-	-
Conservation Lands Upland	-	-	-	-	-	-	-	-	-	-	-	-
Wetlands	-	-	-	-	-	-	-	-	-	-	-	-
Conservation Lands Wetland	-	-	-	-	-	-	-	-	-	-	-	-
<b>Unincorporated County Total Residential</b>	<b><del>82,896</del> 83,113</b>	<b><del>4,453</del> 4,669</b>	<b>457</b>	<b>-</b>	<b>4,270</b>	<b>1,002</b>	<b>24</b>	<b>598</b>	<b>548</b>	<b>-</b>	<b>-</b>	<b>1,415</b>
Commercial	8,916	300	53	-	450	27	9	125	150	-	-	1,216
Industrial	4,787	30	3	-	300	10	15	70	315	-	-	2,134
<b>Non Regulatory Allocations</b>												
Public	<del>120,239</del> 120,211	<del>14,219</del> 14,191	622	-	4,864	7,323	6	2,340	583	-	-	9,660
Active AG	21,944	5,500	-	-	240	90	-	-	-	-	-	2
Passive AG	13,685	5,500	-	-	615	100	-	-	-	-	-	485
Conservation	<del>87,758</del> 87,746	<del>2,468</del> 2,458	297	-	1,163	3,186	67	1,595	926	-	-	2,206
Vacant	<del>26,266</del> 26,118	<del>1,294</del> 1,145	28	-	733	766	8	103	17	-	-	88
<b>Total</b>	<b>366,520</b>	<b>33,793</b>	<b>1,460</b>	<b>-</b>	<b>12,634</b>	<b>12,505</b>	<b>129</b>	<b>4,831</b>	<b>2,538</b>	<b>-</b>	<b>-</b>	<b>17,205</b>
<b>Population Distribution (unincorporated Lee County)</b>	<b>584,331</b>	<b>8,235</b>	<b>1,470</b>	<b>-</b>	<b>35,253</b>	<b>2,179</b>	<b>152</b>	<b>725</b>	<b>5,273</b>	<b>-</b>	<b>-</b>	<b>22,281</b>