



APPLICATION FOR A COMPREHENSIVE PLAN AMENDMENT - TEXT

Project Name: Caloosa 80

Project Description: Text amendment proposed to Table 1(b) to increase the residential acreage in the Northeast Lee County District. This is accompanied by a Map Amendment Proposal to change the future land use (FLU) category of the 92.71 +/- acre site from Rural to Sub-Outlying Suburban and to add the Property (192.3 +/- acres) to the Lee County Utilities, Future Water and Sanitary Sewer Service Areas. Through a companion MPD rezone request, development on the Property will be restricted to 783 RV units and 30,000 SF of commercial uses.

State Review Process: State Coordinated Review Expedited State Review Small-Scale Text*

*Must be directly related to the implementation of small-scale map amendment as required by Florida Statutes.

APPLICANT – PLEASE NOTE:

A PRE-APPLICATION MEETING IS REQUIRED PRIOR TO THE SUBMITTAL OF THIS APPLICATION.

Submit 3 copies of the complete application and amendment support documentation, including maps, to the Lee County Department of Community Development.

Once staff has determined that 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, 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.



COMMUNITY DEVELOPMENT

- Name of Applicant:** Caloosa 80 LLP c/o Stan Whitcomb
Address: 631 Turtle Beach Road
City, State, Zip: North Palm Beach, FL 33408
Phone Number: 239-405-0836 **E-mail:** stanw@whitgroup.net
- Name of Contact:** RVi Planning + Landscape Architecture c/o Rhea Lopes
Address: 10150 Highland Manor Dr, Suite 450
City, State, Zip: Tampa, FL 33610
Phone Number: (607) 216-2390 **E-mail:** rlopes@rviplanning.com
- Property Information:** Provide an analysis of any property within Unincorporated Lee County that may be impacted by the proposed text amendment. The text amendment is limited to addition of acreage to District 1, Northeast Lee County to allow for a FLU amendment from Rural to Sub-Outlying Suburban. The subject property, of which 92.71 +/- acres is proposed to be designated as Sub-Outlying Suburban, will be the only property impacted by this amendment.

4a. Does the proposed change affect any of the following areas?

If located in one of the following areas, provide an analysis of the change to the affected area.

- | | | |
|---|---|--|
| <input type="checkbox"/> Public Acquisition [Map 1-D] | <input type="checkbox"/> Southeast Lee County Residential Overlay [Map 2-D] | <input type="checkbox"/> Urban Reserve [Map 1-D] |
| <input type="checkbox"/> Agricultural Overlay [Map 1-G] | <input type="checkbox"/> Mixed Use Overlay [Map 1-C] | <input type="checkbox"/> Water-Dependent Overlay [Map 1-H] |
| <input type="checkbox"/> Airport Mitigation Lands [Map 1-D] | <input type="checkbox"/> Community Planning Areas [Map 2-A] | <input type="checkbox"/> Private Recreational Facilities Overlay [Map 1-F] |
| <input type="checkbox"/> Airport Noise Zones [Map 1-E] | | |

4b. Planning Communities/Community Plan Area Requirements

If located in one of the following planning communities/community plan areas, provide a meeting summary document of the required public informational session [Lee Plan Goal 17].

- N/A Bayshore [Goal 18] Boca Grande [Goal 19] Buckingham [Goal 20]
- Caloosahatchee Shores [Goal 21] Olga [Goal 22] Captiva [Goal 23] Greater Pine Island [Goal 24]
- Lehigh Acres [Goal 25] North Captiva [Goal 26] NE Lee County [Goal 27] Alva [Goal 28]
- North Olga [Goal 29] North Fort Myers [Goal 30] Page Park [Goal 31] San Carlos Island [Goal 32]
- Southeast Lee County [Goal 33] Tice [Goal 34]

Public Facilities Impacts

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

1. **Traffic Circulation Analysis:** Provide an analysis of the effect of the change on the Financially Feasible Transportation Plan/Map 3-A (20-year horizon) and on the Capital Improvements Element (5-year horizon).
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

Environmental Impacts

Provide an overall analysis of potential environmental impacts (positive and negative).

Historic Resources Impacts

Provide an overall analysis of potential historic impacts (positive and negative).

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. 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.
4. List State Policy Plan goals and policies, and Strategic Regional Policy Plan goals, strategies, 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.

SUBMITTAL REQUIREMENTS

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

MINIMUM SUBMITTAL ITEMS

<input checked="" type="checkbox"/> Completed application (Exhibit – T1)
<input checked="" type="checkbox"/> Filing Fee (Exhibit – T2)
<input checked="" type="checkbox"/> Pre-Application Meeting (Exhibit – T3) 5/18/2022
<input checked="" type="checkbox"/> Proposed text changes (in strike through and underline format) (Exhibit – T4)
<input checked="" type="checkbox"/> Analysis of impacts from proposed changes (Exhibit – T5)
<input checked="" type="checkbox"/> Lee Plan Analysis (Exhibit – T6)
<input checked="" type="checkbox"/> Environmental Impacts Analysis (Exhibit – T7)
<input checked="" type="checkbox"/> Historic Resources Impacts Analysis (Exhibit – T8)
<input checked="" type="checkbox"/> State Policy Plan Analysis (Exhibit – T9)
<input checked="" type="checkbox"/> Strategic Regional Policy Plan Analysis (Exhibit – T10)

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

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
Residential By Future Land Use Category											
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	3,648	25	-	-	490	13	3	429	-	-	-
Sub-Outlying Suburban	1,731	93	-	-	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	7,764	2338	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	-	-	-	-	-	-	-	-	-	-	-
Unincorporated County Total Residential	83,113	4,669	457	-	4,270	1,002	24	598	548	-	1,415
Commercial	8,916	300	53	-	450	27	9	125	150	-	1,216
Industrial	4,787	30	3	-	300	10	15	70	315	-	2,134
Non Regulatory Allocations											
Public	120,211	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	87,746	2,458	297	-	1,163	3,186	67	1,595	926	-	2,206
Vacant	26,118	1,145	28	-	733	766	8	103	17	-	88
Total	366,520	33,793	1,460	-	12,634	12,505	129	4,831	2,538	-	17,205
Population Distribution (unincorporated Lee County)	584,331	8,235	1,470	-	35,253	2,179	152	725	5,273	-	22,281

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

Future Land Use Category	Planning District												
	District 11 Daniels Parkway	District 12 Iona / McGregor	District 13 San Carlos	District 14 Sanibel	District 15 South Fort Myers	District 16 Pine Island	District 17 Lehigh Acres	District 18 Southeast Lee County	District 19 North Fort Myers	District 20 Buckingham	District 21 Estero	District 22 Bashore	
Residential By Future Land Use Category	Intensive Development	-	-	-	-	801	1	30	-	376	-	-	-
	Central Urban	-	656	20	-	3,113	-	7,362	-	2,225	-	-	-
	Urban Community	-	978	1,318	-	863	540	17,034	-	-	115	-	-
	Suburban	-	2,566	2,069	-	1,202	659	-	-	6,387	-	-	-
	Outlying Suburban	1,253	438	-	-	-	502	-	-	406	-	90	-
	Sub-Outlying Suburban	-	-	13	-	-	-	-	-	145	66	-	950
	Commercial	-	-	-	-	-	-	-	-	-	-	-	-
	Industrial	-	3	3	-	3	-	-	-	-	-	-	-
	Public Facilities	-	-	-	-	-	-	-	-	-	-	-	-
	University Community	-	-	503	-	-	-	-	-	-	-	-	-
	Destination Resort Mixed Use Water Dependent	-	8	-	-	-	-	-	-	-	-	-	-
	Burnt Store Marina Village	-	-	-	-	-	-	-	-	-	-	-	-
	Industrial Interchange	-	-	-	-	-	-	-	-	-	-	-	-
	General Interchange	58	-	-	-	-	-	-	8	14	-	-	20
	General Commercial Interchange	-	-	-	-	-	-	-	-	-	-	-	-
	Industrial Commercial Interchange	-	-	-	-	-	-	-	-	-	-	-	-
	University Village Interchange	-	-	-	-	-	-	-	-	-	-	-	-
	New Community	-	-	-	-	-	-	-	-	-	-	-	-
	Airport	-	-	-	-	-	-	-	-	-	-	-	-
	Tradeport	-	-	-	-	-	-	-	-	-	-	-	-
	Rural	1,573	-	99	-	-	227	14	-	454	50	-	1,387
	Rural Community Preserve	-	-	-	-	-	-	-	-	-	3,517	-	-
	Coastal Rural	-	-	-	-	-	1,338	-	-	-	-	-	-
	Outer Island	-	2	-	-	-	55	-	-	-	-	-	-
Open Lands	80	-	-	-	-	-	-	-	30	-	-	1,667	
Density Reduction/ Groundwater Resource	-	-	-	-	-	-	-	4,742	-	-	-	2,101	
Conservation Lands Upland	-	-	-	-	-	-	-	-	-	-	-	-	
Wetlands	-	-	-	-	-	-	-	-	-	-	-	-	
Conservation Lands Wetland	-	-	-	-	-	-	-	-	-	-	-	-	
Unincorporated County Total Residential	2,964	4,650	4,024	-	5,982	3,322	24,440	4,750	10,035	3,748	90	6,125	
Commercial	326	774	938	-	2,012	288	900	118	1,121	19	18	72	
Industrial	5	198	387	-	566	67	218	215	244	4	2	4	
Non Regulatory Allocations													
Public	3,214	4,898	6,364	-	5,883	4,831	20,267	17,992	10,117	3,052	653	3,351	
Active AG	5	13	5	-	-	2,780	35	12,000	90	630	4	550	
Passive AG	10	-	5	-	-	70	50	2,500	250	2,000	-	2,100	
Conservation	1,677	9,786	2,232	-	211	15,489	1,077	41,028	1,607	382	1,465	895	
Vacant	20	55	158	-	4	2,200	14,804	2,400	1,183	850	130	1,425	
Total	8,221	20,374	14,114	-	14,658	29,047	61,791	81,003	24,649	10,684	2,362	14,523	
Population Distribution (unincorporated Lee County)	14,322	44,132	54,615	-	76,582	13,431	162,245	17,369	110,722	5,951	741	8,653	



Caloosa 80 Comprehensive Plan Amendment

EXHIBIT T5, T6, T9, & T10 – Lee Plan, State Policy Plan and Strategic Regional Policy Plan Analyses, Justification of the Proposed Amendment & Community Plan Area Consistency

I. Request

Caloosa 80 LLP (“Applicant”) is requesting approval of a Large-Scale Comprehensive Plan Amendment to change the future land use (FLU) category of 92.71 +/- acres of the 192.3+/- acre site (“Property”) from Rural to Sub-Outlying Suburban, and to add the Property to the Lee County Utilities, Future Water and Sanitary Sewer Service Areas. This request requires a text amendment to Table 1(b) to increase the residential acreage of land in the Sub-Outlying Suburban FLU category of District 1, Northeast Lee County. Lee Plan Map 1A, Map 4A, and Map 4B are also proposed to be amended as a part of this request.

The total Property owned by the Applicant is 192.3 acres. Currently, the majority of the site (99.6 acres) is within the Urban Community FLU category, which allows for 6 du/acre and commercial uses. The remaining 92.7 acres of the Property are designated as Rural and are limited to 1 du/acre.

The amendment will allow for the development of a maximum of 2 du/ac in the parcels proposed as Sub-Outlying Suburban. This would entail a maximum total of 783 dwelling units, in accordance with the use and density limitations set forth in Lee Plan Table 1(a).

The proposed text amendment will ensure sufficient residential acreage is allocated to the Sub-Outlying Suburban FLU category of District 1 per Lee Plan Table 1(b) to support this request. There is existing available residential acreage within the Urban Community FLU category of District 1 as well as commercial acreage in District 1.

The Applicant has filed a companion Mixed Use Planned Development (MPD) rezoning application to further limit development of the Property to 783 Recreational Vehicle (RV) units and up to 30,000 SF of neighborhood commercial retail along with accessory uses, and supportive infrastructure.

II. Existing Conditions & Property History

The Property is located south of Palm Beach Boulevard (SR 80) and east of Bateman Road and west of Goggin Road. The Property is currently zoned Recreational Vehicle Planned Development (RVPD) per Resolution No. Z-09-042 and is located within the Northeast Lee County and Alva Community Planning Areas. The Property is currently utilized as pastures. The RVPD zoning district permits the development of 417 RV site, including 121 transient and 296 non-transient RV sites, with associated accessory and subordinate uses, including limited commercial uses.

III. Surrounding Land Use Pattern

The Property is within a suburban area with a mix of residential, commercial, and public land uses. The surrounding land use pattern consists of public rights-of-way to the north and west, low-density

single-family residential dwellings and pastures to the north, east, and south, and the Hickey Creek Mitigation Park to the west. To the northeast of the Property, across SR 80, there are some commercial uses including a restaurant and plant nursery.

Lands in the immediate area are designated Rural, Conservation, as well as Urban Community to the south and northwest of the Property, and further to the east along SR 80. While there are significant lands in the area already in Urban Community, including the majority of the Property, the request is to allow for a “step down” or transition of density through the Sub Outlying Suburban FLU.

Table 1 below further defines the surrounding Future Land Use designations, zoning districts and existing land uses.

Table 1: Inventory of Surrounding Lands

	FUTURE LAND USE	ZONING DISTRICT	EXISTING LAND USE
NORTH	Rural	AG-2 (Agricultural)	Right of Way (Palm Beach Blvd.), single-family residential homes, pastures, restaurant, nursery
SOUTH	Urban Community, Rural	AG-2 (Agricultural)	Florida Power & Light easement, single-family residential homes, pastures
EAST	Rural	AG-2 (Agricultural)	Single-family residential homes, pastures
WEST	Conservation Lands - Upland	EC (Environmentally Critical)	Right-of-Way (Bateman Road), Hickey Creek mitigation park

IV. Public Infrastructure

As outlined in the enclosed application, the subject property is serviced by existing public infrastructure that can accommodate the proposed mix of residential and commercial uses.

The amendment proposes to add the Property to the Lee County Utilities, Future Service Areas for Water and Sanitary Sewer. Lee County Utilities has indicated adequate capacity to serve the project for potable water and sanitary sewer service (Exhibit M17).

The Property has frontage and access to SR 80, a state maintained arterial corridor connecting the east and west coasts of the state. The surrounding roadway network has adequate capacity as set forth in the accompanying Traffic Circulation Analysis prepared by TR Transportation Consultants, Inc. (Exhibit M15). There are adequate community facilities and services in the immediate vicinity of the project, including Fire, Law Enforcement, Schools, and Parks. Adequate EMS services are unavailable from the Lee County Public Safety Department. The Applicant is open to working with the County on Conditions to ensure that adequate service is available at the time of construction. Please refer to the enclosed infrastructure analysis and agency availability letters (Exhibit M14, M16 & M17) for a complete description of available infrastructure and services to support the amendment request.

V. Proposed Amendment

The amendment request will allow for development of the Property as a Recreational Vehicle Park, with a maximum of 783 units and up to 30,000 SF of commercial uses, along with associated infrastructure and amenities. The Applicant has submitted a companion MPD rezoning petition to implement the intended development program, while ensuring adequate protection to the environment and rural character of the area.

The current amendment requests for a change in FLU from Rural to Sub-Outlying Suburban, which allows for the increase in density to allow for a compact form of development where infrastructure exists to support new growth, while ensuring that the rural character of the community is preserved. The proposed FLU category restricts residential density to 2 units per acre, achieving a gradual reduction in densities from Urban Community that lies to the immediate west to the Rural lands to the east.

At the same time, the RV park introduces housing options in the community as well as commercial uses that could provide required services to the residents of the RV park and the adjoining rural areas, thereby reducing vehicle miles travelled and allowing for accessibility by bicycle and pedestrians in the project and immediate area.

The proposed development, being developed at a density greater than 2.5 du/ac is required to connect to a public water service, per the Lee Plan Standard 4.1.1. The amendment includes a request for the Property to be added to the Lee County Utilities, Future Water Service Areas. The gross density of the companion MPD is 4 du/acre, thereby exceeding this minimum threshold.

Further, the proposed text amendment requests that additional acreage be added to the Sub-Outlying Suburban FLU category in District 1, ensuring that the project is consistent with Table 1(b) of the Lee Plan.

VI. Lee Plan Consistency & Community Plan Area Consistency

The following is an analysis of how the proposed amendment is consistent with the goals, policies and objectives of the Lee Plan.

POLICY 1.1.11: The Sub-Outlying Suburban future land use category is characterized by low density residential areas. Generally, the infrastructure needed for higher density development is not planned or in place. This future land use category will be placed in areas where higher densities would be incompatible or where there is a desire to retain a low-density community character. Industrial land uses are not permitted. The standard density range is from one dwelling unit per acre (1 du/acre) to two dwelling units per acre (2 du/acre). Bonus densities are not allowed.

RESPONSE: In compliance with this policy, the Property is located in a suburban area of the County, with less dense development. One of the parcels comprising the Property has an Urban Community FLU designation, which allows development of 6 du/ac as evidence of the transitioning nature of this area. By changing the FLU designations of the eastern two parcels from Rural to Sub-Outlying Suburban, there will be a gradual decrease in densities from west to east. While this allows for the increase in density necessary to achieve the Client's compact development program and make appropriate use of available infrastructure, it still ensures a low-density community character, with a net increase of only 1 du/ac across 92.71 acres or 93 units.

STANDARD 4.1.1: WATER.

1. *Any new residential development that exceeds 2.5 dwelling units per gross acre, and any new single commercial or industrial development in excess of 30,000 square feet of gross leasable*

(floor) area per parcel, must connect to a public water system (or a “community” water system as that is defined by Fla. Admin. Code R. 62-550)

...

6. *If a development lies outside any service area as described above, the developer may:*
- request that the service area of Lee County Utilities or an adjacent water utility be extended to incorporate the property;*
 - establish a community water system for the development; or*
 - develop at an intensity that does not require a community water system.*

RESPONSE: The proposed development of the Property is 783 RVs on 192.3 acres, for a total gross density of 4 du/acre. This amendment includes a request to be added to the Future Water Service Area for Lee County Utilities to allow the project to connect to for potable water service in accordance with this policy. Lee County Utilities has indicated available capacity to serve this project (Exhibit M17).

POLICY 5.1.5: Protect existing and future residential areas from any encroachment of uses that are potentially destructive to the character and integrity of the residential environment. Requests for conventional rezonings will be denied in the event that the buffers provided in Chapter 10 of the Land Development Code are not adequate to address potentially incompatible uses in a satisfactory manner. If such uses are proposed in the form of a planned development or special exception and generally applicable development regulations are deemed to be inadequate, conditions will be attached to minimize or eliminate the potential impacts or, where no adequate conditions can be devised, the application will be denied altogether. The Land Development Code will continue to require appropriate buffers for new developments.

RESPONSE: The proposed amendment is requesting a change in the FLU designation from Rural to Sub-Outlying Suburban. The proposed FLU designation does not permit commercial or industrial development, that could be destructive to the low-density, rural character of the area. Further, through the companion MPD rezone, non-residential uses are further restricted to specific neighborhood commercial uses that would serve the Recreational Vehicle (RV) park community and adjoining residential areas within the Urban Community designated portions of the site. Roughly 4.5 acres of the project are to be dedicated towards 30,000 SF of neighborhood commercial uses and are appropriately oriented to the intensive SR 80 frontage. Per the companion rezone, this proposed MPD is planned with adequate buffering from adjoining residential uses that meet the requirements of the Land Development Code (LDC).

POLICY 28.1.1: Evaluate and identify appropriate commercial areas with a focus on the rural village area.

RESPONSE: The commercial uses proposed on the Property will be along SR 80. SR 80 is a 4-lane arterial roadway, that will provide a strategic location for neighborhood commercial uses. Further, sidewalks and a shared-use path are planned for the portion of SR 80 within the Alva Community (Map 3-D), allowing for pedestrian access from surrounding neighborhoods.

POLICY 28.1.4: New industrial activities or changes of land use that allow future industrial activities, not directly associated with Alva’s commercial agriculture, are prohibited in Alva.

RESPONSE: The proposal requests a change of FLU from Rural to Sub-Outlying Suburban. Industrial uses are not permitted in this FLU category per Policy 1.1.11. Further, only neighborhood commercial uses, that could benefit the RV park residents and surrounding neighborhoods are being proposed through the companion MPD rezone.

POLICY 28.2.2: Future land use amendments that would increase the allowable total density of Alva are discouraged and must demonstrate consistency with the objectives and policies of this goal through concurrent planned development rezoning. Future Land Use Map amendments that would decrease the allowable total density of Alva and that are otherwise consistent with the objectives and policies of this goal are encouraged.

RESPONSE: While the proposed FLU amendment looks to increase the allowable total density of Alva, it is accompanied by a planned development rezoning to MPD. Through this companion rezoning petition, the objectives and policies of the Alva Community Plan Goal to enhance the rural, historic and agricultural character and protect natural resources will be met. The rezone establishes development standards for the RV park, along with protection of natural resources. Impacts to existing wetlands on the Property are minimized through establishment of preserve areas. Further, adequate buffering is proposed along Bateman Road, adjacent to the Hickey Creek Mitigation Park. The proposed development will be clustered to ensure adequate open space on the Property.

Further, the FLU amendment is to change the designation of part of the Property from Rural to Sub-Outlying Suburban. The remainder of the Property is already designated as Urban Community, allowing for development of up to 6 du/ac. While there is a proposed increase in density to allow for financial feasibility of the project, the change to the Sub-Outlying Suburban designation only creates an increase of 93 units across the 192.3 +/- project. The Sub-Outlying Suburban FLU designation is specifically designed for places “where there is a desire to retain a low-density community character” per Policy 1.1.11 of the Lee Plan. This designation would allow for densities to gradually decrease from Urban Community to the adjoining Rural.

POLICY 124.1.2: The County’s wetlands protection regulations will be consistent with the following:

4. Every reasonable effort will be required to avoid or minimize adverse impacts on wetlands through the clustering of development and other site planning techniques. On- or off-site mitigation will only be permitted in accordance with applicable state standards.

RESPONSE: The proposed development protects on-site wetlands, by designation of preserve areas through the companion MPD Rezone.

POLICY 125.1.2: New development and additions to existing development must not degrade surface and ground water quality.

RESPONSE: Prior to future development activities on the Property, the Applicant will obtain the requisite Environmental Resource Permit (ERP) from the South Florida Water Management District, and all other applicable state agencies. The site design will ensure pretreatment of stormwater prior to discharge off-site.

VII. Adjacent Local Governments

The subject property is located entirely within Lee County.

VII. State Comprehensive Plan Consistency

The proposed amendment is consistent with the State Comprehensive Land Use Plan's intent to ensure protection of natural resources while providing housing opportunities. Specifically, the amendment is consistent with the following guiding policies:

Housing. The public and private sectors shall increase the affordability and availability of housing for low-income and moderate-income persons, including citizens in rural areas, while at the same time encouraging self-sufficiency of the individual and assuring environmental and structural quality and cost-effective operations.

RESPONSE: The proposal will allow for housing opportunities through the RV park, while also ensuring clustering through the Planned Development zoning to minimize impacts on wetlands and the adjacent Hickey Creek Mitigation Park through designation of preserve areas and buffers, as demonstrated on the MCP included in the companion MPD rezone petition. The amendment will allow for slightly higher densities to accommodate the demand for housing options in Lee County, in an area that fronts a major state corridor and where surrounding densities/intensities support the change.

Land Use. In recognition of the importance of preserving the natural resources and enhancing the quality of life of the state, development shall be directed to those areas which have in place, or have agreements to provide, the land and water resources, fiscal abilities, and service capacity to accommodate growth in an environmentally acceptable manner.

RESPONSE: There is service capacity in place to serve the project in terms of potable water, sanitary sewer service, solid waste, law enforcement, fire, parks, and school services (Exhibit M17). The Applicant will work with County regarding EMS services. Further, through the companion MPD rezone petition, the project will ensure preservation of environmental resources through preservation of wetlands and other sensitive lands, and stormwater management. Development will be clustered to ensure open space as well as adequate buffering, especially along Bateman Road, adjacent to the Hickey Creek Mitigation Park.

Transportation. Florida shall direct future transportation improvements to aid in the management of growth and shall have a state transportation system that integrates highway, air, mass transit and transportation.

RESPONSE: The project is serviced by an arterial roadway, SR 80. Pedestrian access options through a shared use path and sidewalks are planned for the area (Map 3-D).

Natural Systems & Recreational Lands. Florida shall protect and acquire unique natural habitats and ecological systems, such as wetlands, tropical hardwood hammocks, palm hammocks, and virgin longleaf pine forests, and restore degraded natural systems to a functional condition.

RESPONSE: The site is an active agricultural pasture with just 10.3 acres of wetlands. These wetlands are planned to be protected and designated within the preserve areas on the companion MPD rezone.

VIII. Regional Policy Plan Consistency

The proposed amendment is consistent with the Southwest Florida Regional Policy Plan (SWFRPP) as follows:

Housing Element

Goal 2: Southwest Florida will develop (or redevelop) communities that are livable and offer residents a wide range of housing and employment opportunities.

RESPONSE: The proposed amendment will offer a unique option for housing through the RV park. Further, 30,000 SF of commercial uses on the property will help provide services to the residents of the park as well as the neighboring rural communities.

Natural Resources Element

Goal 4: Livable communities designed to improve quality of life and provide for the sustainability of our natural resources.

RESPONSE: The proposed amendment and companion rezoning application will provide for stormwater management infrastructure to ensure protection of the wetlands located within the Property.

Regional Transportation

Goal 2: Livable communities designed to affect behavior, improve quality of life and responsive to community needs.

RESPONSE: The property is serviced by The property is serviced by Palm Beach Boulevard (SR 80), a county-maintained 4-lane arterial roadway. As demonstrated in the Traffic Circulation Analysis by TR Transportation Consultants, Inc., there is adequate capacity available to serve the project. Further, the strategic location of neighborhood commercial uses in the project will serve the future residents of the RV park as well as surrounding rural residential areas.

IX. Conclusion

The proposed Comprehensive Plan Text and Map Amendments are to allow for an increase in density and to add the Property to the Lee County Utilities service areas for water and sanitary sewer. These amendments will allow for a change to the existing RVPD zoning on the Property, through the companion MPD rezone application. The application is consistent with the Lee Plan, the State Comprehensive Plan, and Regional Policy Plan. The Applicant respectfully requests approval of this petition and reserves the right to make any changes to the request during the review process.

CALOOSA 80

ENVIRONMENTAL ASSESSMENT & CURSORY SPECIES SURVEY REPORT

Lee County STRAP #'s: 29-43-27-00-00005.0000; 29-43-27-00-00012.0060; 30-43-27-00-00001.0190

August 2022

Prepared For:

Caloosa 80, LLP. - Stan Whitcomb
c/o: RVi Planning & Landscape Architecture
Rhea Lopes – Project Manager
28100 Bonita Grande Drive, Suite 305
Bonita Springs, FL 34135
Phone: 239-850-8525
Email: rlopes@rviplanning.com

Prepared By:



BearPaws Environmental Consulting
1599 Covington Circle East
Phone: (239) 340-0678
Email: BearPaws.Env.Consulting@GMail.com

Introduction

An environmental assessment and cursory species survey was conducted on the Caloosa 80 property on August 9, 2022. The 191.06± acre site is located in Sections 29 & 30, Township 43S, and Range 27E, of Lee County, Florida. More specifically, the site is located immediately south of SR 80 (Palm Beach Boulevard), east of Bateman Road, and west of Goggin Road, in Fort Myers, Florida. Please see the attached Project Location Map (Exhibit A).

The purpose of this assessment was to identify the potential for either U.S. Army Corps of Engineers (ACOE) Department of Environmental Protection (DEP), and/or South Florida Water Management District (SFWMD) jurisdictional wetlands. The site was also assessed to determine the potential of listed (endangered, threatened, etc.) species inhabiting the site that are regulated by the U.S. Fish & Wildlife Service (FWS) and the Florida Fish & Wildlife Conservation Commission (FWC).

A cursory species survey was also provided to inspect the property for any and all potential listed species that could inhabit the site. Listed (endangered, threatened, etc.) species are regulated by the US Fish & Wildlife Service (FWS) and/or the Florida Fish & Wildlife Conservation Commission (FWC). Specific attention was paid toward that of locating any gopher tortoise (*Gopherus polyphemus*), as well as locating any potential fox squirrel (*Sciurus niger*) nests, Florida bonneted bat (*Eumops floridanus*) cavity trees, and any Audubon's crested caracara (*Caracara plancus audubonii*) or bald eagle (*Haliaeetus leucocephalus*) nests. An updated survey covering the entire property, including preserve areas, will be provided prior to any on-site development.

The project's surrounding land uses are a mixture of residential homes, undeveloped vacant land, and forested land. The surveys were conducted throughout the day; the temperatures were in the mid-upper 80's, with light breezes, and mostly cloudy skies.

Background

The ACOE, DEP, and the SFWMD are the agencies that regulate development activities in wetlands. To be considered wetlands by the ACOE, DEP, and/or SFWMD, the area should exhibit wetland hydrology, contain wetland vegetation, and have hydric soils. For an area to be considered wetlands, a site should have hydric soils, wetland hydrology, and wetland vegetation present. The property was reviewed for indicators of these parameters.

Hydric soils are identified by certain characteristics that are unique to wetland soils. Wetland hydrology is normally present if the soil is saturated or inundated for a period of time; typically, from May through November; the rainy season in Southwest Florida. In the absence of visual signs of saturation or inundation, the regulatory agencies typically use hydrologic indicators such as adventitious rooting, lichen lines, or algal matting as method of guidance. If the majority of the shrubs/plants that are present are those that are adapted to saturated soil conditions, it's likely wetland vegetation.

The FWS and FWC are the primary agencies that review potential impacts to listed species. The FWS reviews potential impacts and provides comments to the ACOE and DEP during the permitting process, while the FWC provides comments to the SFWMD. In general, the wildlife agency concerns need to be addressed in order for the permits to be authorized by the ACOE, DEP, and/or the SFWMD.

Methodology

The species survey was conducted utilizing combined methodologies from Lee County's Land Development Code (LDC, Chapter 10, Article III, Division 8 - Protection of Habitat) and also encompassed the Lee County Endangered Species Ordinance No. 89-34. Surveys for Lee County protected species are based on the presence of specific vegetation associations and habitat types noted on-site, as outlined in the LDC. The frequency of transects performed in these habitats, unless otherwise discussed, were designed to meet the minimum updated coverage requirement. Following the Lee County Endangered Species Ordinance No. 89-34, the specific methodology included pedestrian surveys of parallel transects. The survey was conducted according to the previously approved Lee County methodology, submitted by Kevin L. Erwin Consulting Ecologist, Inc.

These methods are comprised of a several step process. The vegetation communities or land-uses on the study area are delineated on an aerial photograph using the Florida Land Use, Cover and Forms Classification System (FLUCFCS). Next, these FLUCFCS codes are cross-referenced with the Lee County Protected Species List. With a list of the potential listed plants and animals, each FLUCFCS community is searched in the field for these species. An intensive pedestrian survey is conducted using parallel belt transects as a means of searching for protected plants and animals; signs or sightings of these species are then recorded.

Existing Site Conditions

Boundary – The project boundary was obtained from the Lee County parcel data and is assumed to be approximately 191.06± acres.

Soils - The soils on the property have been mapped by the National Resource Conservation Service (NRCS, formerly the Soil Conservation Service). These mappings are general in nature but can provide a certain level of information about the site as to the possible extent of wetland area. The agencies commonly use these mappings as justification for certain wetland/upland determinations. According to these mappings, the parcel is underlain by Myakka fine sand (NRCS #11; non-hydric), Boca fine sand (NRCS #13; non-hydric), Immokalee sand (NRCS #28; hydric), Oldsmar sand (NRCS #33; non-hydric), Wabasso sand (NRCS #35; non-hydric), Myakka fine sand, depressional (NRCS #53; hydric), and Boca fine sand, slough (NRCS #74; hydric), soils. Myakka fine sand, Boca fine sand, Immokalee sand, Oldsmar sand, and Wabasso sand soils are considered non-hydric at both the local and national levels. Please see the attached NRCS Soils Map (Exhibit D).

Vegetation Descriptions – Vegetation is one parameter used in determining the presence of uplands or wetlands; these community mappings will generally reflect what a specific area could be considered by the regulatory agencies. We identified approximately 8.68± acres of wetlands and 1.62± acres of “other surface water” communities on-site during the initial site assessment.

While on-site, generalized community delineations are hand-drawn on an aerial defining the different vegetation associations on-site. These general delineations were based on the nomenclature of the Florida Land Use, Cover and Forms Classification System (FLUCFCS), Level III and IV (FDOT 1999). Please see the attached FLUCFCS Map with Aerial (Exhibit B) and FLUCFCS Map without Aerial (Exhibit C). Listed below are the vegetation communities and land-uses identified on the site.

FLUCFCS Codes & Community Descriptions

Uplands

The following community areas have been designated as upland habitats. Uplands are any area that does not qualify as a wetland because the associated hydrologic regime is not sufficiently wet enough to elicit development of vegetation, soils, and/or hydrologic characteristics associated with wetlands.

FLUCFCS 211 Improved Pastures – 67.05 ± Acres

This upland habitat type occupies approximately 67.05± acres. The canopy and sub-canopy is mostly open with widely scattered slash pine (*Pinus elliotti*), and live oak (*Quercus virginiana*). Young specimens of these tree species are also found widely scattered in the mid-story and groundcover. Other common mid-story species include Brazilian pepper (*Schinus terebinthifolius*), and cabbage palm (*Sabal palmetto*). The groundcover is dominated by bahia grass (*Paspalum notatum*), with musky mint (*Hyptis alata*), spadeleaf (*Centella asiatica*), cesar weed (*Urena lobata*), tickseed (*Coreopsis floridana*), rosy camphorweed (*Pluchea rosea*), and dollarweed (*Hydrocotyle umbellata*), with various other opportunistic weedy species. Commonly observed vines include greenbriar (*Smilax sp.*), grapevine (*Vitis rotundifolia*), Virginia creeper (*Parthenocissus quinquefolia*), and peppervine (*Ampelopsis arborea*). This community should be considered uplands by regulatory agencies.

FLUCFCS 213 Woodland Pasture – 42.65± Acres

This upland habitat type occupies the approximately 42.65± acres of the property. Canopy is mostly open with widely scattered live oak (*Quercus virginiana*), laurel oak (*Quercus laurifolia*), and slash pine (*Pinus elliottii*). The sub-canopy includes cabbage palm (*Sabal palmetto*), wax myrtle (*Myrica cerifera*), and Brazilian pepper (*Schinus terebinthifolius*). Ground cover is dominated by bahia grass (*Paspalum notatum*) with scattered saw palmetto (*Serenoa repens*), dog fennel (*Eupatorium capillifolium*), ragweed (*Ambrosia trifida*), caesar weed (*Urena lobata*), hairy beggar-ticks (*Bidens alba*), smutgrass (*Sporobolus sp.*), false buttonweed (*Spermacoce verticillata*), three-awn grass (*Aristida purpurea*), and flattop goldenrod (*Euthamia caroliniana*), with various other opportunistic weedy species. Commonly observed vines include greenbriar (*Smilax sp.*), grapevine (*Vitis rotundifolia*), Virginia creeper (*Parthenocissus quinquefolia*), peppervine (*Ampelopsis arborea*), and poison ivy (*Toxicodendron radicans*). This community would be considered uplands by the regulatory agencies.

FLUCFCS 321 Palmetto Prairie – 3.66± Acres

This upland habitat type occupies approximately 3.66± acres of the property. The canopy contains scattered slash pine (*Pinus elliottii*), live oak (*Quercus virginiana*), and cabbage palm (*Sabal palmetto*). The sub-canopy consists of Brazilian pepper (*Schinus terebinthifolius*), beauty-berry (*Callicarpa americana*), winged sumac (*Rhus copallinum*), and saw palmetto (*Serenoa repens*). The ground cover is dominated by saw palmetto (*Serenoa repens*), with various other opportunistic weedy species. Commonly observed vines include grapevine (*Vitis rotundifolia*) and greenbriar (*Smilax sp.*). This community would be considered uplands by regulatory agencies.

FLUCFCS 411 Pine Flatwoods – 66.52± Acres

This upland community type occupies approximately 66.52± acres of the property. The canopy vegetation is dominated by slash pine (*Pinus ellotti*), with scattered live oak (*Quercus virginiana*), and melaleuca (*Melaleuca quinquenervia*). The sub-canopy includes cabbage palm (*Sabal palmetto*), rusty lyonia (*Lyonia ferruginea*), tar flower (*Bejaria racemosa*), wax myrtle (*Myrica cerifera*), and buckthorn (*Rhamnus caroliniana*). Ground cover is dominated by saw palmetto (*Serenoa repens*), with bahia grass (*Paspalum notatum*), blue maidencane (*Amphicarpum muhlenbergianum*), cogon grass (*Imperata cylindrica*), beautyberry (*Callicarpa americana*), beakrush (*Rhynchospora spp.*), goldentop (*Euthamia graminifolia*), pennyroyal (*Piloblephis rigida*), chalky bluestem (*Andropogon capillipes*), white paw paw (*Asimina triloba*), paspalum (*Paspalum spp.*), panicum (*Panicum spp.*), gopher apple (*Ucania michauxit*), dog fennel (*Eupatorium capifolium*), ragweed (*Ambrosia artemisifolia*), bracken fern (*Pteridium aquilinum*), wiregrass (*Aristida stricta*), and broomsedge (*Andropogon glomeratus*), with various other opportunistic weedy species. Commonly observed vines include greenbriar (*Smilax spp.*), grapevine (*Vitis rotundifolia*), and poison ivy (*Toxicodendron radicans*). This community would be considered uplands by regulatory agencies.

FLUCFCS 420 Mixed Upland Hardwoods – 0.88± Acres

This upland community type occupies approximately 0.88± acres of the property. The canopy is dominated by live oak (*Quercus virginiana*), with slash pine (*Pinus elliottii*), java plum (*Syzygium cumim*), and melaleuca (*Melaleuca quinquenervia*). The sub-canopy contains cabbage palm (*Sabal palmetto*), Brazilian pepper (*Schinus terebinthifolius*), wax myrtle (*Myrica cerifera*), myrsine (*Rapanea guinensis*), wild coffee (*Psychotria nervosa*), cocoplum (*Chrysobalanus icaco*), and beauty-berry (*Callicarpa americana*). The groundcover contained Spanish needle (*Bidens alba*), false buttonweed (*Spermacoce floridan*), cogon grass (*Imperata cylindrica*), caesar weed (*Urena lobata*), dog fennel (*Eupatorium capillifolium*), ragweed (*Ambrosia artemisiifolia*), sandspur (*Cenchrus echinatus*), broomsedge (*Andropogon virginicus*), and bahia grass (*Paspalum notatum*), with various other opportunistic weedy species. Commonly observed vines include air potato (*Dioscorea bulbifera*), greenbriar (*Smilax sp.*), grapevine (*Vitis rotundifolia*), Virginia creeper (*Parthenocissus quinquefolia*), peppervine (*Ampelopsis arborea*), and poison ivy (*Toxicodendron radicans*). This community would be considered uplands by the regulatory agencies.

Wetlands

The following community areas have been designated as wetland habitats. Wetlands are any areas that under normal circumstances have hydrophytic vegetation, hydric soils, and wetland hydrology.

FLUCFCS 211H Hydric Improved Pasture – 4.03± Acres

This wetland area occupies approximately 4.03± acres of the property. The canopy is mostly open. The sub-canopy is also mostly open with widely scattered cabbage palm (*Sabal palmetto*), Carolina willow (*Salix caroliniana*), primrose willow (*Ludwigia peruviana*), saltbush (*Baccharis halimifolia*), wax myrtle (*Myrica cerifera*), and Brazilian pepper (*Schinus terebinthifolius*). The ground cover includes torpedo grass (*Panicum repens*), swamp fern (*Blechnum serrulatum*), yellow-eyed grass (*Xyris floridana*), pickerel weed (*Pontederia cordata*), arrowhead (*Sagittaria latifolia*), rosy camphorweed (*Pluchea rosea*), sand cordgrass (*Spartina sp.*), dog fennel (*Eupatorium capillifolium*), mermaid-weed (*Proserpinaca palustris*), tickseed (*Coreopsis floridana*), asiatic pennywort (*Centella asiatica*), dollar weed (*Hydrocotyle umbellata*), frog fruit (*Phyla nodiflora*), maidencane (*Panicum hemitomon*), mock bishop's weed (*Ptilimnium capillaceum*), and white-top sedge (*Rhynchospora colorata*), with other various grasses and sedges. This community does contain some transitional wetland vegetation, advantageous rooting, water line staining, and algal matting, as well as other signs in this community that would be classified as wetlands. This community would be considered wetlands by the regulatory agencies.

FLUCFCS 618 Willow & Wax Myrtle – 2.02± Acres

This wetland community type occupies approximately 2.02± acres of the property. The canopy is dominated by Carolina willow (*Salix caroliniana*), with melaleuca (*Melaleuca quinquenervia*), and scattered bald cypress (*Taxodium distichum*). The sub-canopy contains wax myrtle (*Myrica cerifera*), and buttonbush (*Cephalanthus occidentalis*), with Brazilian pepper (*Schinus terebinthifolius*) along the perimeter of the wetland. The ground cover vegetation includes swamp fern (*Blechnum serrulatum*), yellow-eyed grass (*Xyris floridana*), rosy camphorweed (*Pluchea rosea*), dollar weed (*Hydrocotyle umbellata*), little blue maidencane (*Amphicarpum muhlenbergianum*), frog fruit (*Phyla nodiflora*), false buttonweed (*Spermacoce verticillata*), mock bishop's weed (*Ptilimnium capillaceum*), smart weed (*Polygonum hydropiperoides*), pickerel weed (*Pontederia cordata*), arrowhead (*Sagittaria latifolia*), fire flag (*Thalia geniculata*), and white-top sedge (*Rhynchospora colorata*), with various other grasses and sedges. This community does contain some transitional wetland vegetation, advantageous rooting, water line staining, and algal matting, as well as other signs in this community that would be classified as wetlands. This community would be considered wetlands by the regulatory agencies.

FLUCFCS 641 Freshwater Marsh – 2.63± Acres

This wetland area occupies approximately 2.63± acres of the property. The canopy is mostly open with scattered Carolina willow (*Salix caroliniana*), and melaleuca (*Melaleuca quinquenervia*). The sub-canopy contains primrose willow (*Ludwigia peruviana*), with saltbush (*Baccharis halimifolia*), wax myrtle (*Myrica cerifera*), and Brazilian pepper (*Schinus terebinthifolius*) along the edges. The ground cover includes torpedo grass (*Panicum repens*), swamp fern (*Blechnum serrulatum*), fire flag (*Thalia geniculata*), yellow-eyed grass (*Xyris floridana*), cat-tail (*Typha latifolia*), rosy camphorweed (*Pluchea rosea*), sand cordgrass (*Spartina sp.*), dog fennel (*Eupatorium capillifolium*), mermaid-weed (*Proserpinaca palustris*), asiatic pennywort (*Centella asiatica*), dollar weed (*Hydrocotyle umbellata*), frog fruit (*Phyla nodiflora*), maidencane (*Panicum hemitomon*), mock bishop’s weed (*Ptilimnium capillaceum*), and white-top sedge (*Rhynchospora colorata*), with other various grasses and sedges. This community does contain some transitional wetland vegetation, advantageous rooting, water line staining, and algal matting, as well as other signs in this community that would be classified as wetlands. This community would be considered wetlands by the regulatory agencies.

Other Surface Waters (OSW)

The following community area has been designated as other surface waters. Surface waters are waters on the surface of the earth, contained in bounds created naturally or artificially.

FLUCFCS 500 Cow Pond – 0.56± Acres

This “other surface water” (OSW) communities occupy approximately 0.56± acres of the property. The canopy and sub-canopy is open. The groundcover contains duckweed (*Lemna minor*), dotted smartweed (*Polygonum punctatum*), mermaid weed (*Proserpinaca palustris*), water hyssop (*Bacopa monnieri*), dollarweed (*Hydrocotyle umbellata*), and torpedo grass (*Panicum repens*). This community would be considered “other surface waters” by the regulatory agencies.

FLUCFCS 510 Ditch/Swale – 1.06± Acres

This habitat type occupies approximately 1.06± acres of the property. The canopy and sub-canopy is open with widely scattered Carolina willow (*Salix caroliniana*) and Brazilian pepper (*Schinus terebinthifolius*) with saltbush (*Baccharis halimifolia*), and wax myrtle (*Myrica cerifera*). along the edges. The ground cover contains scattered cattail (*Typha latifolia*), maidencane (*Panicum hemitomon*), spikerush (*Eleocharis spp.*), dotted smartweed (*Polygonum punctatum*), torpedo grass (*Panicum repens*), water hyssop (*Bacopa monnieri*), and asiatic pennywort (*Centella asiatica*). This community would be considered other surface waters by the regulatory agencies.

Table 1. FLUCFCS Community Table

FLUCFCS Code	Community Description	Habitat Type	Acres
211	Improved Pasture	Upland	67.05± Ac.
211H	Hydric Improved Pasture	Wetland	4.03± Ac.
213	Woodland Pasture	Upland	42.65± Ac.
321	Palmetto Prairie	Upland	3.66± Ac.
411	Pine Flatwoods	Upland	66.52± Ac.
420	Mixed Upland Hardwoods	Upland	0.88± Ac.
500	Cow Pond	OSW	0.56± Ac.
510	Ditch/Swale	OSW	1.06± Ac.
618	Willow & Wax Myrtle Wetland	Wetland	2.02± Ac.
641	Freshwater Marsh	Wetland	2.63± Ac.
Total			191.06± Ac.

Species Survey Results

There have been numerous prior environmental assessments and species surveys conducted on-site; the most recent survey was conducted August 2022. During the most recent cursory species survey, there were no nest-like structures or tree cavities were noted. There were no tortoise burrows were identified during the initial survey; however, there was plenty of sufficient habitat. An updated overall species survey within the proposed development portion of the site will be required prior to development.

There were several non-listed species identified while conducting the protected species survey, among those were several mourning doves, pine warblers, Eastern cottontail rabbits, grey squirrels, and a black racer. The various listed species that may occur in the FLUCFCS communities on-site have been tabulated on the attached table below.

Mitigation Discussion

Generally, the ACOE and/or DEP does not regulate isolated wetlands or excavation in wetlands where there is only incidental fall back of fill material; the ACOE or DEP do not have jurisdiction over isolated wetlands. In making the determination on whether the wetlands are isolated, the ACOE and DEP considers if water leaves the site, (i.e. ditches) or whether the wetlands are completely contained on-site or extend off-site. If the wetlands extend off-site, they will more than likely assert jurisdiction. Currently, the ACOE and DEP position on most all wetlands is that one of them has jurisdiction; the ACOE regulates navigable waters whereas the DEP regulates both navigable waters and adjacent wetlands. However, the agencies would not make this determination until a Joint Environmental Resource Permit (ERP) and Dredge & Fill Permit (D&F) application is received.

The SFWMD does not require mitigation for impacts to isolated wetlands not used by listed (protected) species that are less than 0.50± acres in size. Impacts to wetlands greater than 0.50± acres or those utilized by protected species would require mitigation. With the ACOE and DEP, impacts to wetlands that are less than 0.50± acres, the activity can usually be processed as a Nationwide Permit application. For projects with greater than 0.50± acres of impacts, the application will be processed as an Individual Permit application. This involves a public notice process and coordination with other federal agencies such as the EPA and the FWS.

There are three steps that are required to be addressed when requesting an ERP permit with the SFWMD and/or the DEP for impacts to regulated wetlands:

- 1) Avoidance (i.e. can these wetland impacts be completely avoided)
- 2) Minimization (i.e. can the amount of wetland impact be reduced while maintaining a feasible project)
- 3) Mitigation (i.e. the loss of wetland function must be replaced)

It should be noted that avoidance and minimization must first be substantiated, before mitigation will be considered by the agencies. When wetlands are proposed to be impacted, the impacts cannot result in any loss of wetland function. In order to prevent net loss in wetland function, wetland mitigation must be provided. Mitigation is a way to off-set impacts to natural resources such as wetlands and may consist of wetland enhancement, wetland creation, wetland preservation, upland compensation, or off-site mitigation. Mitigation costs usually increase with the quantity of proposed impacts. The actual amount of mitigation required would be finalized during the Environmental Resource Permit review process with the SFWMD, ACOE, and DEP.

There are two main categories of wetland mitigation, onsite or off-site. On-site mitigation would include preserving a portion of the on-site wetlands, treating and removing the exotics, potentially providing supplemental plantings, and placing the preserve areas under a Conservation Easement. Preserve areas are required to be maintained in perpetuity. Off-site mitigation requires the purchase of wetland credits at an approved mitigation bank within the service area of the site.

Summary

In general, this site does not contain much native, undisturbed community types in which protected species would typically inhabit. Due to the disturbed nature of the site, the surrounding land uses, and busy roadways, it is unlikely that this site supports or would provide habitat for protected species. Community locations were drawn using non-rectified aerial images with approximate property boundaries; hence their location, aerial extent, and acreage is approximate. Before any detailed site planning, it is recommended that the wetland lines are flagged, surveyed by professional land surveyor, and approved by the regulatory agencies.

The information contained and the work performed as part of this initial assessment, conforms to the standards and generally accepted practices in the environmental field, and was prepared substantially in accordance with then-current technical guidelines and criteria. The determination of ecological system classifications, functions, values, and boundaries, is an inexact science, and different individuals and agencies may reach different conclusions; therefore, the conclusions of this report are preliminary in nature and would require a full review by the appropriate regulatory agencies.

Table 3: Listed Species by Habitat with Current Status

FLUCFCS Code	FLUCFCS Description	Common Name	Scientific Name	Observed	USDA	FDA&CS	FWS	FWC
211	Improved Pasture	Florida Sandhill crane	<i>Grus canadensis pratensis</i>	--	--	--	--	T
213	Woodland Pasture	Florida sandhill crane	<i>Grus canadensis pratensis</i>	--	--	--	--	T
321	Palmetto Prairie	Audubon's crested caracara	<i>Polyborus plancus audubonii</i>	--	--	--	T	T
		Beautiful paw-paw	<i>Deeringothamnus pulchellus</i>	--	E	E	E	--
		Curtis milkweed	<i>Asclepias curtissii</i>	--	--	E	--	--
		Fakahatchee burmannia	<i>Burmannia flava</i>	--	--	E		
		Florida black bear	<i>Ursus americanus floridanus</i>	--	--	--	SAT	T
		Eastern indigo snake	<i>Drymarchon corais couperi</i>	--	--	--	T	T
		Gopher frog	<i>Rana areolata</i>	--	--	--	--	SSC
		Gopher tortoise	<i>Gopherus polyphemus</i>	--	--	--	T	T
		Florida black bear	<i>Ursus americanus floridanus</i>	--	--	--	SAT	T
		Florida coontie	<i>Zamia floridana</i>	--	--	C	--	--
		Florida sandhill crane	<i>Grus canadensis pratensis</i>	--	--	--	--	T
		Southeastern American kestrel	<i>Falco sparverius paulus</i>	--	--	--	--	T
411	Pine Flatwoods	Beautiful paw-paw	<i>Deeringothamnus pulchellus</i>	--	E	E	E	--
		Big cypress fox squirrel	<i>Sciurus niger avicennia</i>	--	--	--	--	SSC
		Eastern indigo snake	<i>Drymarchon corais couperi</i>	--	--	--	T	T
		Fakahatchee burmannia	<i>Burmannia flava</i>	--	--	E	--	--
		Florida black bear	<i>Ursus americanus floridanus</i>	--	--	--	SAT	T
		Florida coontie	<i>Zamia floridana</i>	--	--	C	--	--
		Gopher frog	<i>Rana areolata</i>	--	--	--	--	SSC
		Gopher tortoise	<i>Gopherus polyphemus</i>	--	--	--	T	T
		Red-cockaded woodpecker	<i>Picoides borealis</i>	--	--	--	E	SSC
		Satinleaf	<i>Chrysophyllum olivaeforme</i>	--	--	T	--	--
Southeastern American Kestrel	<i>Falco sparverius paulus</i>	--	--	--	--	T		
420	Mixed Upland Hardwoods	Audubon's crested caracara	<i>Polyborus plancus audubonii</i>	--	--	--	T	T
		Eastern indigo snake	<i>Drymarchon corais couperi</i>	--	--	--	T	T
		Florida black bear	<i>Ursus americanus floridanus</i>	--	--	--	SAT	T
		Hand adder's tongue fern	<i>Ophioglossum palmatum</i>	--	--	E	--	--
		Simpson's stopper	<i>Myrcianthes fragrans var. simpsonii</i>	--	--	T	--	--
		Gopher tortoise	<i>Gopherus polyphemus</i>	--	--	--	T	T
500	Other Surface Water	American alligator	<i>Alligator mississippiensis</i>	--	--	--	SAT	SSC
		Everglades mink	<i>Mustela vison evergladensis</i>	--	--	--	--	T
		Limpkin	<i>Aramus guarauna</i>	--	--	--	--	SSC
		Little blue heron	<i>Egretta caerulea</i>	--	--	--	--	SSC
		Reddish egret	<i>Egretta rufescens</i>	--	--	--	--	SSC
		Roseate spoonbill	<i>Ajaia ajaja</i>	--	--	--	--	SSC
		Snowy egret	<i>Egretta thula</i>	--	--	--	--	SSC
		Tricolored heron	<i>Egretta tricolor</i>	--	--	--	--	SSC

C = Commercially Exploited, SAT = Similarity of Appearance Threatened, SSC = Species of Special Concern, T = Threatened, E = Endangered

Table designates listed species with potential to occur in each FLUCFCS community.

Table 3 Cont'd: Listed Species by Habitat with Current Status

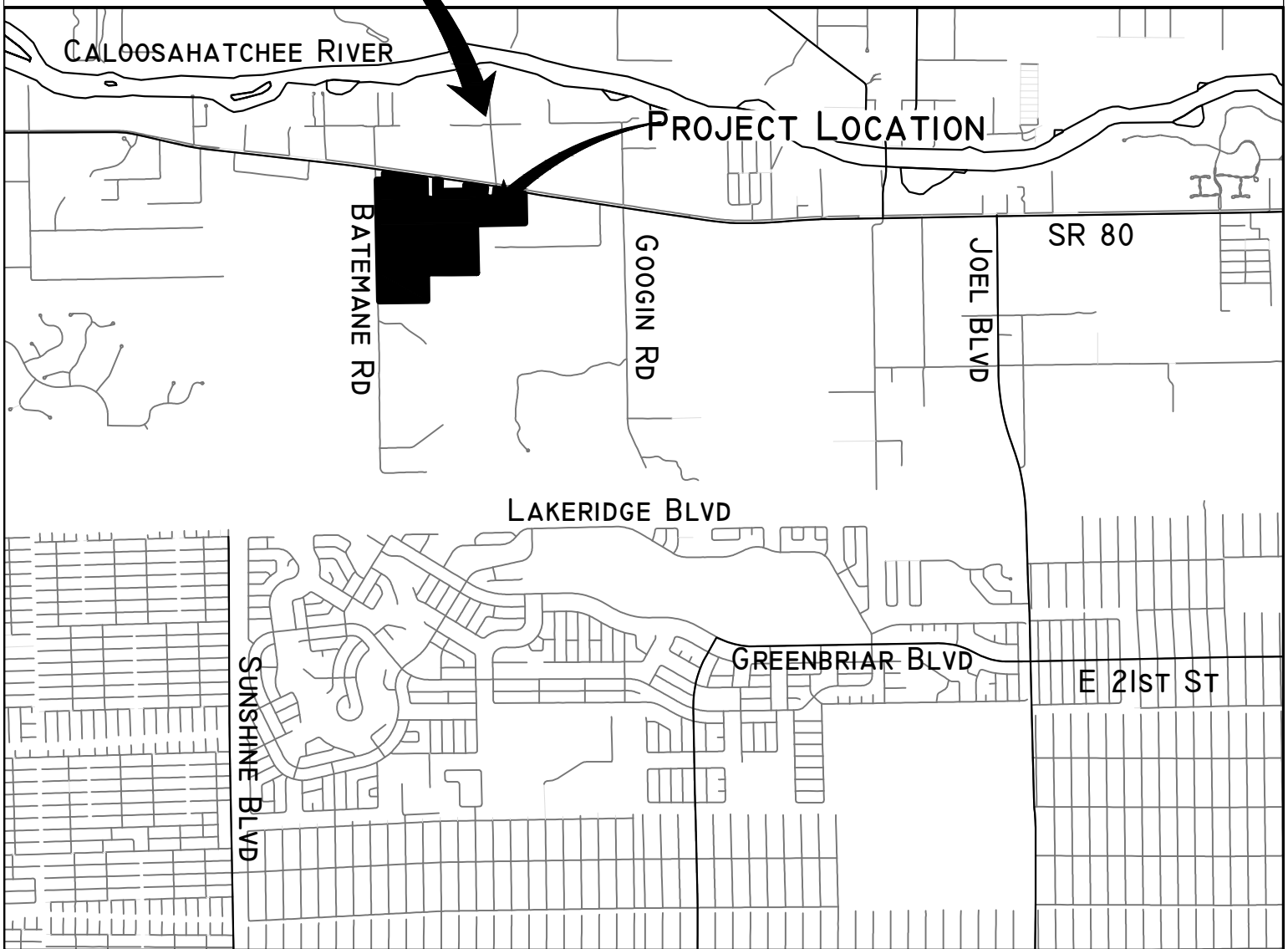
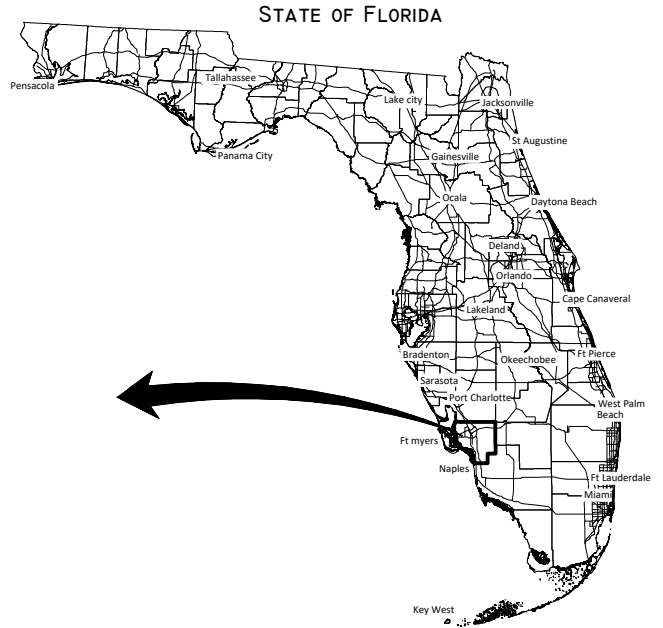
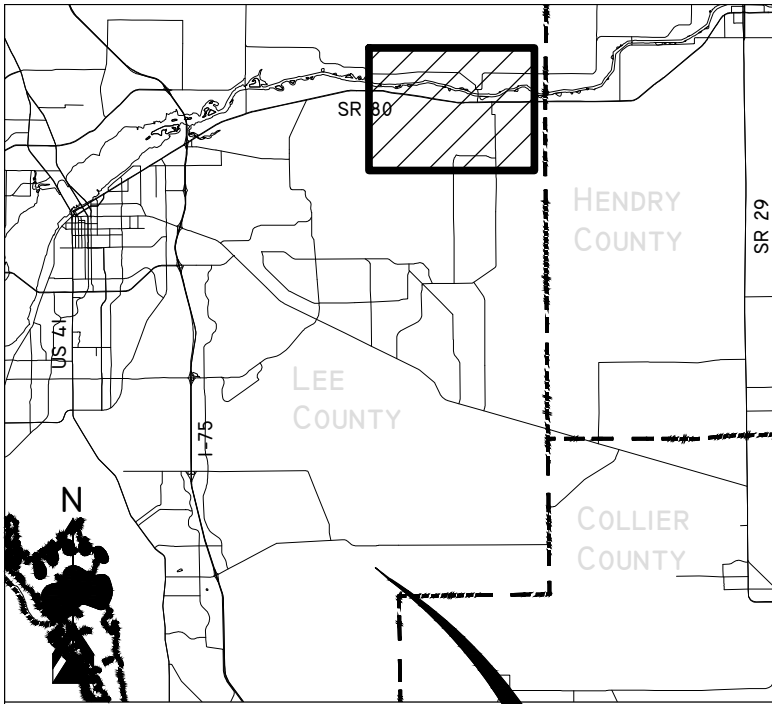
618	Wax Myrtle & Willow	Florida black bear	<i>Ursus americanus floridanus</i>	--	--	--	SAT	T
		Limpkin	<i>Aramus guarauna</i>	--	--	--	--	SSC
		Little blue heron	<i>Egretta caerulea</i>	--	--	--	--	SSC
		Snowy egret	<i>Egretta thula</i>	--	--	--	--	SSC
641	Freshwater Marsh	Tricolored heron	<i>Egretta tricolor</i>	--	--	--	--	SSC
		American alligator	<i>Alligator mississippiensis</i>	--	--	--	SAT	SSC
		Everglades mink	<i>Mustela vison evergladensis</i>	--	--	--	--	T
		Florida sandhill crane	<i>Grus canadensis pratensis</i>	--	--	--	--	T
		Limpkin	<i>Aramus guarauna</i>	--	--	--	--	SSC
		Little blue heron	<i>Egretta caerulea</i>	--	--	--	--	SSC
		Snail kite	<i>Rostrhamus sociabilis</i>	--	--	--	E	E
		Snowy egret	<i>Egretta thula</i>	--	--	--	--	SSC
Tricolored heron	<i>Egretta tricolor</i>	--	--	--	--	SSC		

C = Commercially Exploited, SAT = Similarity of Appearance Threatened, SSC = Species of Special Concern, T = Threatened, E = Endangered

Table designates listed species with potential to occur in each FLUCFCS community.

EXHIBIT A

Project Location Map



DRAWN BY:	DATE:	CATEGORY
BWS	8/13/22	LOCATION
JOB NUMBER		SCALE:
		NTS
S/T/R		COUNTY
29-30/43S/27E		LEE

Caloosa 80

Location Map

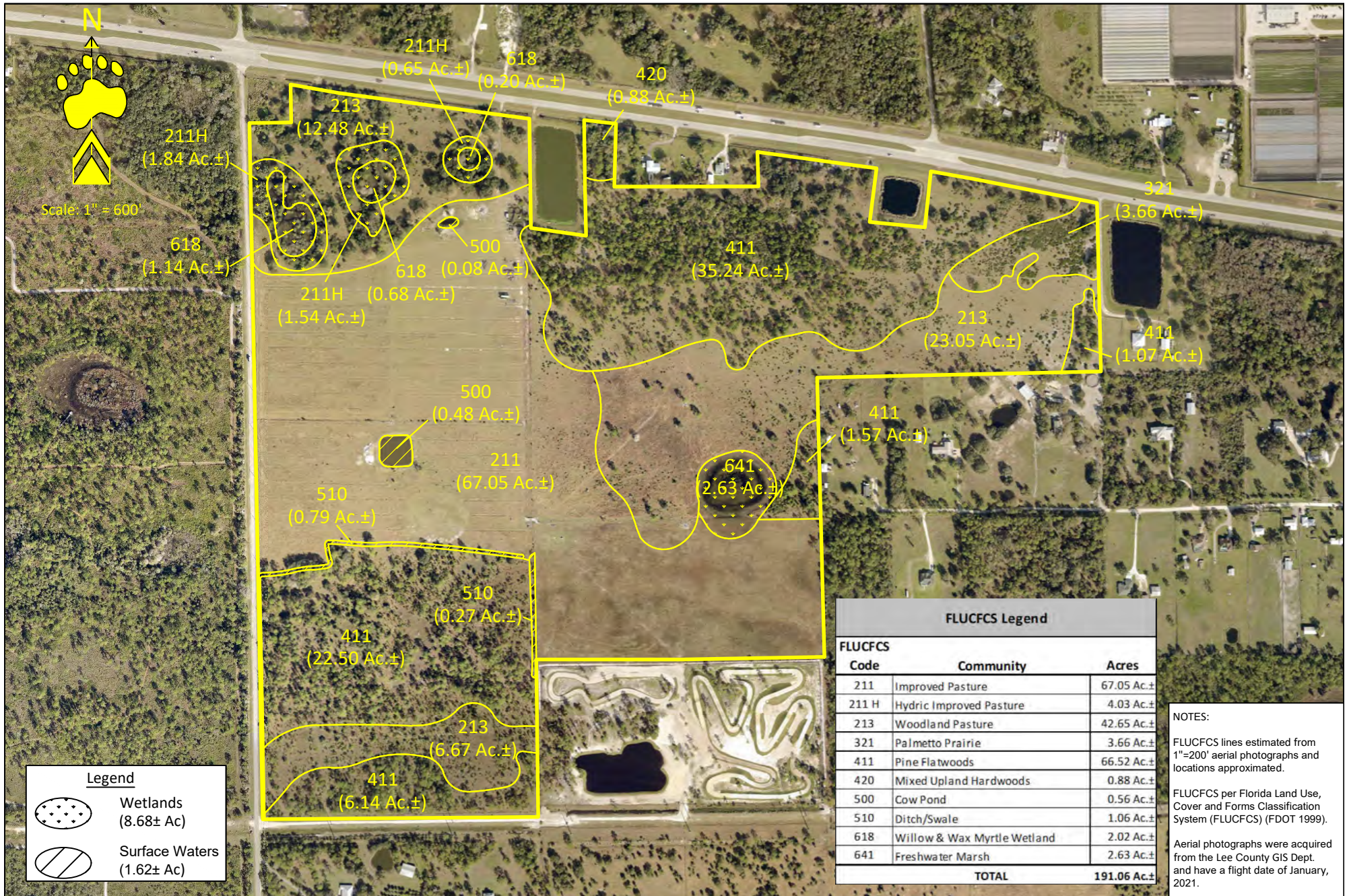
1599 COVINGTON CIRCLE EAST, FORT MYERS, FL 33919
(239) 340-0678 BEARPAWS.ENV.CONSULTING@GMAIL.COM

PAGE

EXHIBIT

EXHIBIT B

FLUCFCS Map with Aerial



Legend	
	Wetlands (8.68± Ac)
	Surface Waters (1.62± Ac)

FLUCFCS Legend		
FLUCFCS Code	Community	Acres
211	Improved Pasture	67.05 Ac.±
211 H	Hydric Improved Pasture	4.03 Ac.±
213	Woodland Pasture	42.65 Ac.±
321	Palmetto Prairie	3.66 Ac.±
411	Pine Flatwoods	66.52 Ac.±
420	Mixed Upland Hardwoods	0.88 Ac.±
500	Cow Pond	0.56 Ac.±
510	Ditch/Swale	1.06 Ac.±
618	Willow & Wax Myrtle Wetland	2.02 Ac.±
641	Freshwater Marsh	2.63 Ac.±
TOTAL		191.06 Ac.±

NOTES:
 FLUCFCS lines estimated from 1"=200' aerial photographs and locations approximated.
 FLUCFCS per Florida Land Use, Cover and Forms Classification System (FLUCFCS) (FDOT 1999).
 Aerial photographs were acquired from the Lee County GIS Dept. and have a flight date of January, 2021.

Revisions	Date:	Drawn By:	Date:
		BWS	8/13/22
		Job Number	
		S/T/R	
		29-30/43S/27E	

Caloosa 80

Aerial FLUCFCS Map

Category	FLUCFCS
Scale:	1" = 600'
County	Lee

1599 Covington Circle East, Fort Myers, FL 33919
 (239) 340-0678 bearpaws.env.consulting@gmail.com

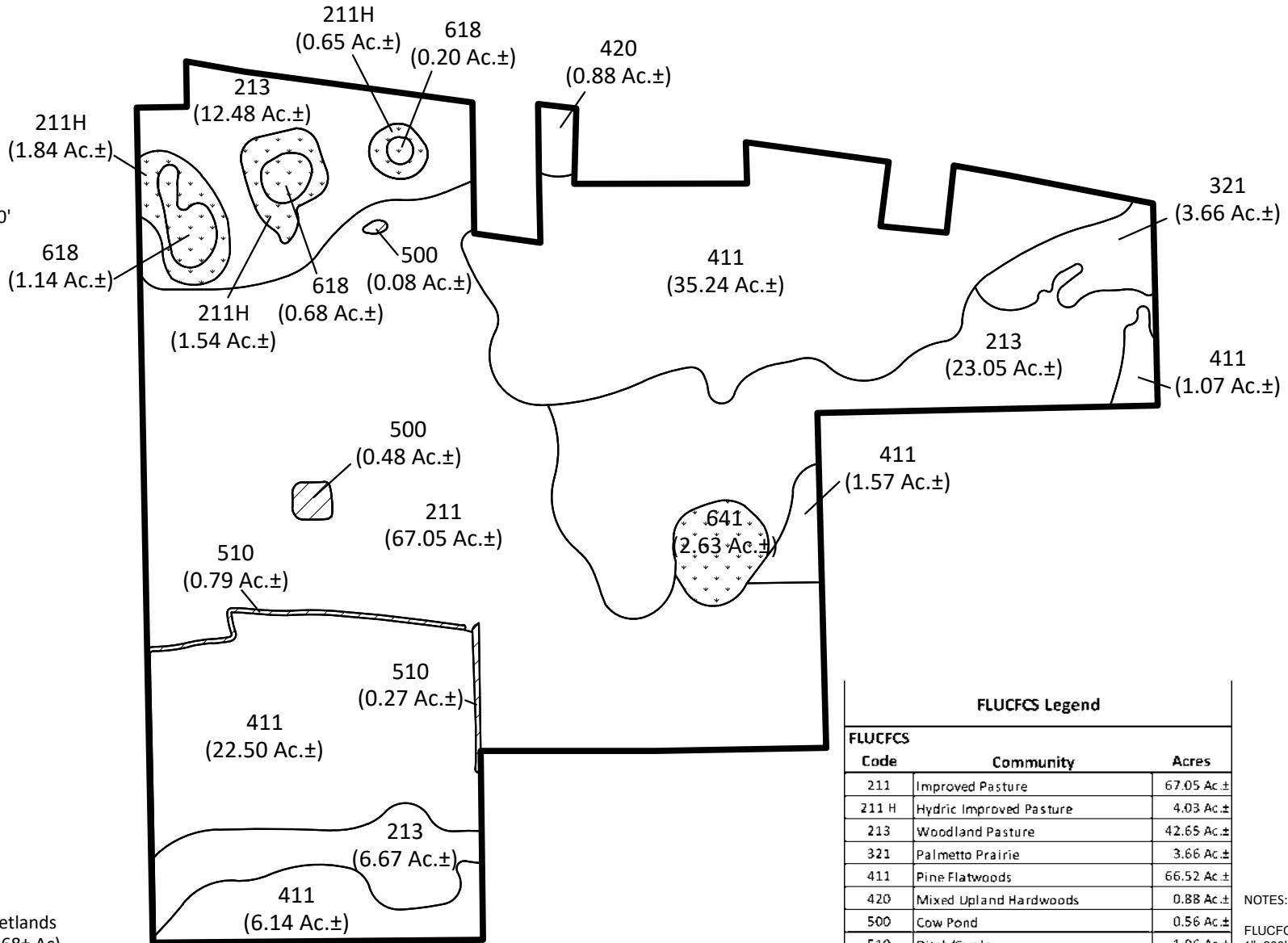
Page	-
Exhibit	-

EXHIBIT C



FLUCFCS Map



Scale: 1" = 600'



Legend

-  Wetlands (8.68± Ac)
-  Surface Waters (1.62± Ac)

FLUCFCS Legend

FLUCFCS		
Code	Community	Acres
211	Improved Pasture	67.05 Ac.±
211 H	Hydric Improved Pasture	4.03 Ac.±
213	Woodland Pasture	42.65 Ac.±
321	Palmetto Prairie	3.66 Ac.±
411	Pine Flatwoods	66.52 Ac.±
420	Mixed Upland Hardwoods	0.88 Ac.±
500	Cow Pond	0.56 Ac.±
510	Ditch/Swale	1.06 Ac.±
618	Willow & Wax Myrtle Wetland	2.02 Ac.±
641	Freshwater Marsh	2.63 Ac.±
TOTAL		191.06 Ac.±

NOTES:

FLUCFCS lines estimated from 1"=200' aerial photographs and locations approximated.

FLUCFCS per Florida Land Use, Cover and Forms Classification System (FLUCFCS) (FDOT 1999).

Revisions	Date:	Drawn By:	Date:
		BWS	8/13/22
		Job Number	
		S/T/R	
		29-30/43S/27E	

Caloosa 80
FLUCFCS Map

Category	FLUCFCS
Scale:	1" = 600'
County	Lee



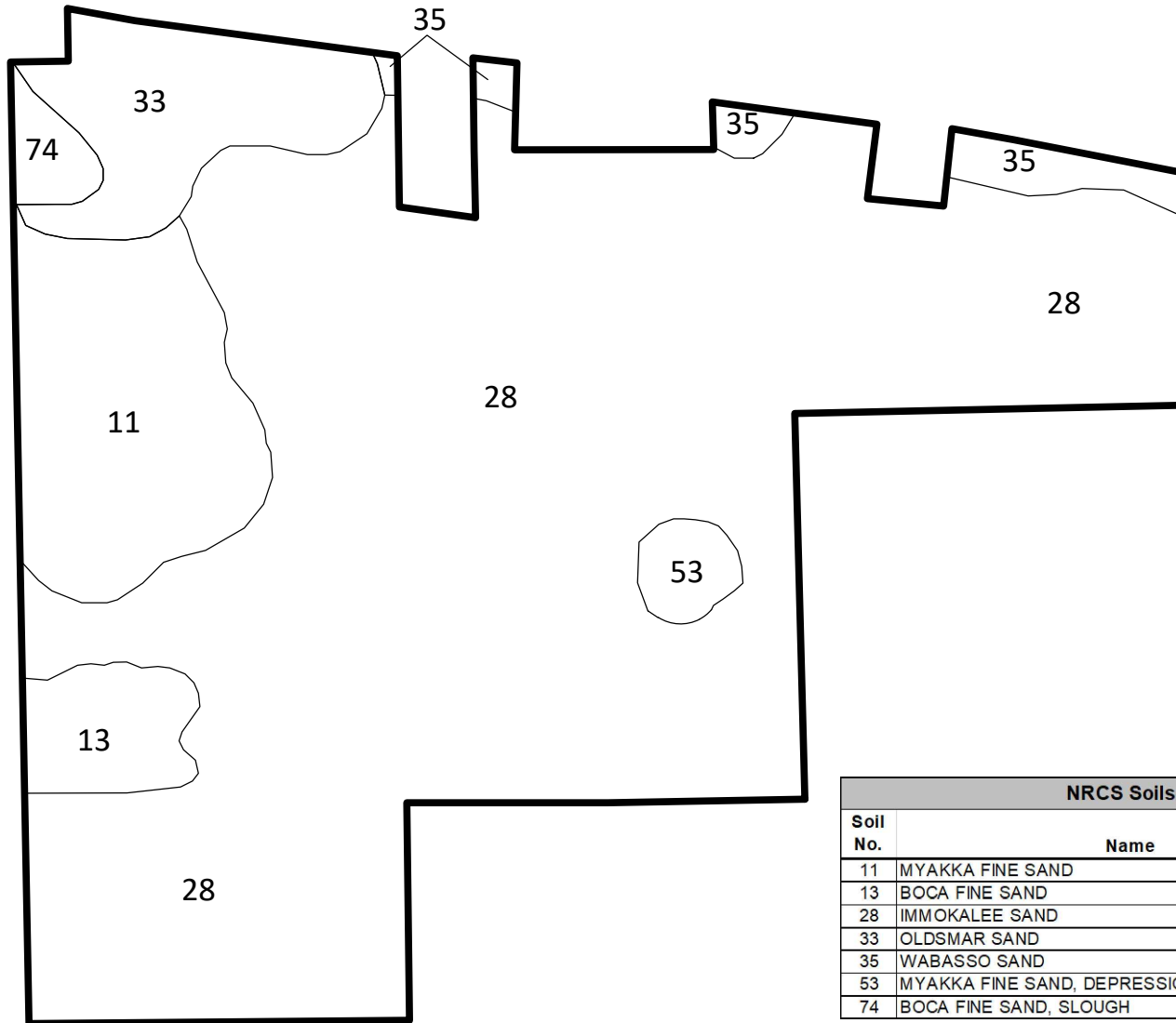
1599 Covington Circle East Fort Myers, FL 33919
(239) 340-0678 bearpaws.env.consulting@gmail.com

Page	-
Exhibit	-

EXHIBIT D
NRCS Soils Map



Scale: 1" = 600'



NRCS Soils Table		
Soil No.	Name	Hydric
11	MYAKKA FINE SAND	NO
13	BOCA FINE SAND	NO
28	IMMOKALEE SAND	NO
33	OLDSMAR SAND	NO
35	WABASSO SAND	NO
53	MYAKKA FINE SAND, DEPRESSIONAL	YES
74	BOCA FINE SAND, SLOUGH	YES

NOTES

Soils were acquired from LABINS and are from the NRCS.

Revisions	Date:	Drawn By: BWS	Date: 8/13/22	<h2 style="margin: 0;">Caloosa 80</h2> <h3 style="margin: 0;">Soils Map</h3>	Category: Soils		Page: -
		Job Number			Scale: 1" = 600'		Exhibit
		S/T/R			County: Lee		
		29-30/43S/27E			1599 Covington Circle East, Fort Myers, FL 33919 (239) 340-0678 bearpaws.env.consulting@gmail.com		-



Caloosa 80 Comprehensive Plan Amendment

Exhibit T8 – Historic Resources Impact Analysis

There are no recorded cultural resources listed on the subject parcels, per the Master Site File Letter. Please see the attached letter from the Florida Department of Historical Resources.

The Lee County Archaeological Sensitivity Map indicates a portion of the Property along the northern boundary is in the Level 2 Sensitivity Zone. It is understood that a Certificate to Dig is required prior to issuance of development permits within this sensitivity zone. Any future development on the site will comply with the requirements of Sec. 22-106 of the LDC.