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AUG 09 2023

COMMUNITY DEVELOPMENT

August 7, 2023

Mr. Brandon Dunn, Principal Planner  
Lee County Government  
1500 Monroe Street  
Ft. Myers, FL 33901

**RE: Caloosa 80  
CPA2022-17 & CPA2022-18**

Dear: Mr. Dunn:

Enclosed please find responses to Staff's comments below in bold. The following items are resubmitted in response to Staff's comments:

1. Revised Lee Plan Compliance Narrative; and
2. TR Transportation Response Letter.

**ZONING COMMENTS:**

1. Staff notes concerns with Objectives 27.1 and 27.2, as the amendment of the future land use category does not seem to retain the rural character of Northeast Lee County. Please expand the narrative to include consistency analysis of these objectives.

**RESPONSE: Please refer to the revised Lee Plan Compliance Narrative which provides further explanation of the proposed rezoning's consistency with the above objectives.**

**TRANSPORTATION COMMENTS:**

1. Please provide the source for the response, "For the segment of North River Road west of Broadway, traffic data at Station 124650 was collected just east of Cemetery Road." As per the FDOT Traffic data sheet, Station 124650 pertains to the North River Road (any segment) from East of SR 31 to Broadway Street. However, in accordance with Lee County AC 11-1 and Lee County's GIS data, North River Road (East or West of Broadway Street) is a County Maintained Minor Arterial (not an Uninterrupted Flow Highway) with a posted speed limit of 30 mph. Similarly, Joel Blvd. is a principal arterial with a posted speed limit of 45 mph as per Lee County AC 11-1 and Lee County's GIS data. The applicant is required to update tables 1A, 2A, 3A, and 4A using the corresponding LOS volume data for these facilities from 'Lee County Generalized Peak Hour Directional Service Volumes.'

**RESPONSE: Please refer to the response letter from TR Transportation.**

2. SR 80 (Palm Beach Blvd) is a state-maintained principal arterial (signalized) located in the 'Rural Developed' area. The applicant must update tables 1A, 2A, 3A, and 4A by utilizing the corresponding LOS volume data for this facility from the 'State Signalized Arterials' section of table 9 from 'FDOT 2020 Quality/ level of Service Handbook.'

**RESPONSE: Please refer to the response letter from TR Transportation.**

3. As the project site is vacant, to evaluate short-range impacts (5-year horizon), the trips generated from table 3 (for proposed land use) must be employed to calculate the AM/PM project traffic. Consequently, table 4A must be updated accordingly.

**RESPONSE: Please refer to the response letter from TR Transportation.**

Thank you in advance for your consideration of the above information. If you require further information, please do not hesitate to contact me at (239) 850-8525 or [acrespo@rviplanning.com](mailto:acrespo@rviplanning.com).

Sincerely,

**RVi** Planning + Landscape Architecture



**Alexis V. Crespo, AICP**  
Vice President of Planning

Enclosures

cc: Stan Whitcomb  
Neale Montgomery, Esq.  
Al Quattrone, P.E.  
Ted Treesh



## **Caloosa 80 Comprehensive Plan Amendment (Map & Text)**

### **Lee Plan, State Policy Plan, Regional Policy Plan, Community Plan Area Consistency & Justification of the Proposed Amendment**

***REVISED AUGUST 2023***

#### **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 three map amendments to Lee Plan Maps 1A, Map 4A, and Map 4B. It also includes 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.

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 700 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 700 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**

	<b>FUTURE LAND USE</b>	<b>ZONING DISTRICT</b>	<b>EXISTING LAND USE</b>
<b>NORTH</b>	Rural	AG-2 (Agricultural)	Right of Way (Palm Beach Blvd.), single-family residential homes, pastures, restaurant, nursery
<b>SOUTH</b>	Urban Community, Rural	AG-2 (Agricultural)	Florida Power & Light easement, single-family residential homes, pastures
<b>EAST</b>	Rural	AG-2 (Agricultural)	Single-family residential homes, pastures
<b>WEST</b>	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 700 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.*

**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.**

*Goal 2: GROWTH MANAGEMENT. To provide for an economically feasible plan which coordinates the location and timing of new development with the provision of infrastructure by government agencies, private utilities, and other sources.*

**The Property is partially located in an urban area pursuant to the underlying Urban Community future land use category. The Property abuts and has direct access to a 4-lane state-maintained arterial roadway. The application proposes to extend water and sewer to the site providing for centralized utility service via water and wastewater treatment plants with capacity to serve the project. The development will be served by the Alva Fire District and the Lee County Sheriff's Office. The proposal to convert the Rural portion of the Property to Sub-Outlying Suburban will accommodate slightly higher densities and make efficient use of infrastructure and services. The request also provides private investment in the County's infrastructure system that will help to reduce reliance on wells and septic tanks in the general area.**

*Objective 2.1: DEVELOPMENT LOCATION. Contiguous and compact growth patterns will be promoted through the rezoning process to contain urban sprawl, minimize energy costs, conserve land, water, and natural resources, minimize the cost of services, and prevent development patterns where large tracts of land are by-passed in favor of development more distant from services and existing communities.*

**The proposed development would result in a contiguous and compact growth pattern. As noted above, the majority of the Property is within Urban Community. The request will allow for additional density and provides infrastructure in an area that Lee County Utilities is able and interested in serving. An existing RVPD zoning approval authorizes development of the RV uses and ancillary commercial uses. The applications filed by the Applicant will simply allow connection to water and sewer; 8 additional RV lots, and commercial that serves not only the RV park residents but the surrounding rural community that is in need of additional retail and services. The applications also protect natural resources by preserving wetlands, reconfiguring the lake system, and providing for expansive perimeter buffers.**

*Objective 2.2: DEVELOPMENT TIMING. Direct new growth to those portions of the future urban areas where adequate public facilities exist or are assured and where compact and contiguous development patterns can be created. Development orders and permits (as defined in §163.3164, Fla. Stat.) will be granted only when consistent with the provisions of §163.3202(2)(g) and § 163.3180, Fla. Stat. and the concurrency requirements in the LDC.*

**As noted above, the majority of the Property is within the Future Urban Area. The request will allow for an expansion of the already approved RV and commercial development program to allow for neighborhood commercial to reduce vehicle miles travelled in the Alva area. LCU has indicated ability to serve the project for both water and sewer, thereby allowing for the expansion of infrastructure along a major arterial corridor, and reducing reliance on wells, septic and/or private wastewater treatment facilities. Other infrastructure and services are available to serve the project per the letters of availability provided.**

**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.

The proposed development of the Property is 700 RVs on 192.3 acres, for a total gross density of 4 du/acre. The amendment proposes to add the Property to the Lee County Utilities Service Area Maps, Future Service Areas for Sanitary Sewer and Potable Water as contemplated by subsection 5 of this policy. Lee County Utilities has indicated adequate capacity to serve the project per the attached letter of availability.

The public benefit of the utilities expansion to the subject property includes reduction of reliance on individual wells and septic tanks in an area proximate to the Caloosahatchee River and significant natural resources (Hickey Creek Mitigation Park). It is understood that the City of LaBelle and Hendry County are extending utilities from the City of LaBelle to the Lee/Hendry County line along SR 80. The proposed expansion will help fill a gap in utility service along this important growth corridor. Therefore, the amendment is consistent with this policy.

*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.*

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).

*Objective 17.3: PUBLIC INPUT. To provide opportunities for public input as part of the comprehensive plan and land development code amendment process.*

The Applicant conducted public information meeting at the Alva Community Center, 21471 N River Rd., Alva, FL 33920, at 7:00 p.m., on Tuesday, December 13, 2022 and February 14, 2023, as part of the Alva, Inc. monthly meeting. The meeting summary prepared by Alva, Inc. is included in this submittal.

*GOAL 27: NORTHEAST LEE COUNTY COMMUNITY PLAN. Maintain, enhance, and support the heritage and rural character, natural resources, and agricultural lands. Alva and North Olga will work cooperatively toward this goal through the objectives and policies that follow, and through their individual community plans.*

The proposed amendment will maintain the rural character through substantial perimeter buffers, clustering of development around protected wetlands and native preserve, and 40' wide setback/vegetative buffer adjacent to Hickey Creek Mitigation Park. The Property is permitted a maximum of 692 RV lots per the underlying future land use map as it exists today. The increase to 700 RV lots is a nominal increase to this allowable density. The proposed commercial uses are also permitted today per the underlying Urban Community future land use on the western portion of the site.

The proposed amendment will result in an enhanced quality of life for existing and future residents through the extension of centralized utility services, which will reduce reliance on private wells and septic tanks, which pose an environmental risk to the groundwater and surface waters. The proposed neighborhood commercial uses will be limited by the companion MPD zoning petition to ensure the uses are appropriate for the rural community, low intensity in nature, and are designed in buildings that achieve the Old Florida architectural vernacular preferred by the Alva Community.

**OBJECTIVE 27.3: NATURAL RESOURCES.** To enhance, preserve and protect the physical integrity, ecological standards, and rural character of Northeast Lee County by focusing on: water basins; native vegetation; wildlife habitat and resources; and areas designated for long-term conservation.

A detailed environmental assessment for the project site was conducted by BearPaws Environmental Consulting and is included in the application materials. The companion rezoning will provide for protection of natural resources by preserving on-site wetlands, providing native preserve in accordance with the LDC, and implementing expansive perimeter buffers, including a 40-foot-wide buffer adjacent to Bateman Road/Hickey Creek Mitigation Park. When combine the proposed design will fully comply with the above policy. Moreover the extension of utilities will reduce the number of private wells and septic tanks in the area, and provide centralized public utilities to this site, which is preferred when compared to a private, on-site wastewater treatment facility.

*OBJECTIVE 28.1: RURAL CHARACTER. Maintain and enhance the rural character and environment of Alva through planning practices that: 1. Manage growth and protect Alva's rural nature. 2. Maintain agricultural lands and rural land use patterns. 3. Provide needed community facilities, transportation systems, and infrastructure capacity. 4. Protect and enhance native species, ecosystems, habitats, natural resources, and water systems. 5. Preserve Alva's historic places and archaeological sites.*

The majority of the Property is located in the Urban Community future land use, which is a future urban area per the Lee Plan. The proposed amendment and companion MPD rezone will increase the allowable density of RV lots to 700, an increase of 8 RV lots. The commercial component of the project is permitted today per the underlying Urban Community future land use. The extension of utilities will provide community facilities to the immediate area and allow more areas to be served by centralized public utilities. The applications will allow for an appropriate transition of growth from west to east and a nominal increase in allowable density. The plan also protects natural resources, including on-site wetlands and uplands, as detailed in this application, as well as the companion MPD rezone. There are no current historic and/or archeological sites located on the development.

The rural character of Alva/Northeast Lee County is also addressed through the design of the project as shown on the companion Planned Development Rezone Master Concept Plan. Expansive buffers and preserve areas along all publicly visible perimeters. Wetland and upland preserve areas will ensure views from SR 80 and Bateman Road are of native vegetation as opposed to development. RV resorts are also indicative of a rural character



based on their locations in Lee County and propensity to locate in areas with open space, publicly owned preserve areas, lower densities and other factors that contribute as a nature amenity. Densities are lower than the maximum attainable with the underlying Urban Community and proposed Sub-Outlying Suburban categories and do not represent the “maximum” attainable densities. Lastly, the proposed commercial uses are low intensity and sized to serve the community and surrounding rural area with neighborhood scale goods and services.

*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.*

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.*

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.

OBJECTIVE 28.5: NATURAL RESOURCES AND ENVIRONMENTAL SYSTEMS. To enhance, preserve, protect, and restore the physical integrity, ecological standards, and natural beauty of the Alva Community Plan area.

A detailed environmental assessment for the project site was conducted by BearPaws Environmental. The amendment and companion MPD protect natural resources, including on-site wetlands and uplands, as detailed in this application, as well as the companion MPD rezone. There are no current historic and/or archeological sites located on the development.

**The plan also protects natural resources, including on-site wetlands and uplands, as detailed in this application, as well as the companion MPD rezone. There are no current historic and/or archeological sites located on the development. been protected to ensure natural beauty on the property while also maintain the rural character of Alva Community.**

*POLICY 28.5.3: All new development and redevelopment must maintain compliance with State of Florida mandated Total Maximum Daily Load (TMDL) requirement for designated water bodies.*

**The Applicant will remain compliant with State of Florida mandated Total Maximum Daily Load requirement. Total Maximum Daily Loads (TMDLs) adopted under Chapter 62-304, F.A.C., that interpret the narrative water quality criterion for nutrients in paragraph 62-302.530(47)(b), F.A.C., for one or more nutrients or nutrient response variables. This will be thoroughly evaluated during the South Florida Water Management (SFWMD) permitting process, and an environmental resource permit (ERP) will not be issued unless the project design demonstrates compliance with these requirements.**

*POLICY 28.5.4: New development and redevelopment in or near existing and potential wellfields must:*  
*1. Be designed to minimize the possibility of contaminating groundwater during construction and operation. 2. Comply with the Lee County Wellfield Protection Ordinance.*

**There are no wellfields on the Property. Please see attached stormwater management narrative describing the lake design and its consistency with Lee County's groundwater protection regulations. Moreover, the lakes have been redesigned since the original zoning approval to break the large central lake previously approved into smaller lakes to better protect the groundwater within and abutting the property.**

*POLICY 28.5.5: Provide educational programs or materials on energy conservation, energy efficiency, greenhouse gas emission reductions, solid waste management, hazardous waste, surface water runoff, septic maintenance, water conservation, Florida Friendly Landscaping, green building, cultural resources, history, etc.*

**This policy is not applicable to individual developments.**

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

**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.**

*GOAL 60: COORDINATED SURFACE WATER MANAGEMENT AND LAND USE PLANNING ON A WATERSHED BASIS. To protect or improve the quality of receiving waters and surrounding natural areas and the functions of natural groundwater aquifer recharge areas while also providing flood protection for existing and future development.*

**The development has conserved the on-site wetlands, which aid in flood protection. The proposed lake system will be designed in accordance with the SFWMD requirement to ensure water is retained on-site until water quality meets minimum standards, at which time water will slowly attenuate off-site at flow rates approved by the district.**

*GOAL 61: PROTECTION OF WATER RESOURCES. To protect the County's water resources through the application of innovative and sound methods of surface water management and by ensuring that the public and private construction, operation, and maintenance of surface water management systems are consistent with the need to protect receiving waters.*

**The site will contain 32+/- acres of lakes that will be maintained properly in accordance with the Lee County Land Development Code. The surface waters and groundwater resources of the County shall be protected to ensure that their biological, ecological, and hydrological functions are maintained, conserved, or improved.**

*POLICY 77.3.7: New development and redevelopment in areas containing a component of the greenways trail system, as identified by the Lee County Greenways Master Plan, must incorporate the greenway trail into their development design. In addition to counting towards the project's general open space requirements, developments constructing the onsite portions of the greenway trail will be eligible for community and regional park impact fee credit.*

**The Pine Island-Hendry Trail is located on SR 80 Beach Boulevard in Lee County. The trail is a part of the Lee County Greenway Master Plan. However, the trail is shared within the arterial roadway. Because the trail is not located within the subject property, the applicant will continue to make improvements in the right-of-way.**

*Policy 124.1.1: Ensure that development in wetlands is limited to very low density residential uses and uses of a recreational, open space, or conservation nature that are compatible with wetland functions. The maximum density in the Wetlands category is one unit per 20 acres, except that one single family residence will be permitted on lots meeting the standards in Chapter XIII. Owners of wetlands adjacent to Intensive Development, General Interchange, Central Urban, Urban Community, Suburban, New Community, Outlying Suburban, Sub-Outlying Suburban, and Rural future land use categories may transfer dwelling units from preserved freshwater wetlands to developable contiguous uplands under common ownership at the same underlying density as permitted for those uplands.*

**The site contained approximately 10.3 acres of wetlands. These wetlands are planned to be protected and designated within the preserve areas on the companion MPD rezone's MCP. 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, particularly along Bateman Road, adjacent to the Hickey Creek Mitigation Park.**

*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.*

**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.*

**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.**

*Policy 126.1.1: Natural water system features which are essential for retention, detention, purification, runoff, recharge, and maintenance of stream flows and groundwater levels shall be identified, protected, and managed.*

**The development has conserved the wetlands and natural preserve on property. The proposed lakes will provide flooding runoff and further protection for the proposed development. The natural water system features such as the surface waters and groundwater levels will be identified, protected and managed.**

*Policy 126.1.4.: Development designs must provide for maintaining or improving surface water flows, groundwater levels, and lake levels at or above existing conditions.*

**The proposed lakes will provide flooding runoff and further protection for the proposed development. the surface waters and groundwater resources of the County shall be protected to ensure that their biological, ecological, and hydrological functions are maintained, conserved, or improved.**

## **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.*

**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.*

**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. 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.*

**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.*

**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.*

**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.*

**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.*

**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.

July 10, 2023

Ms. Rhea Lopes  
RVI Planning  
10150 Highland Manor Drive, Suite 450  
Tampa, FL 33408

RE: Caloosa 80 Map & Text Amendments  
CPA2022-00017 & CPA2022-00018

Dear Ms. Lopes:

TR Transportation Consultants, Inc. has reviewed the Traffic Impact Statement (TIS) comments issued by the Lee County Department of Community Development regarding the Comprehensive Plan Amendment traffic analysis prepared for the above application. The comments and TR Transportation's response to those comments are listed below for reference.

**Transportation Comments:**

1. *Please provide the source for the response, "For the segment of North River Road west of Broadway, traffic data at Station 124650 was collected just east of Cemetery Road." As per the FDOT Traffic data sheet, Station 124650 pertains to the North River Road (any segment) from East of SR 31 to Broadway Street. However, in accordance with Lee County AC 11-1 and Lee County's GIS data, North River Road (East or West of Broadway Street) is a County Maintained Minor Arterial (not an Uninterrupted Flow Highway) with a posted speed limit of 30 mph. Similarly, Joel Blvd. is a principal arterial with a posted speed limit of 45 mph as per Lee County AC 11-1 and Lee County's GIS data. The applicant is required to update tables 1A, 2A, 3A, and 4A using the corresponding LOS volume data for these facilities from 'Lee County Generalized Peak Hour Directional Service Volumes.'*

Attached is an aerial photo illustrating the location of County Station 124650, which is approximately 3,000 west of the 30 mph speed limit zone on Broadway Avenue. The Level of Service analysis on North River Road west of Broadway Avenue is not intended for the short 3,000 foot segment that is posted at 30 mph between Broadway Avenue and the 45 mph speed limit sign but the approximately 9.6 mile segment that operates as a Uninterrupted Flow Highway to S.R.31. Similarly, Joel Boulevard south of S.R 80 operates as an Uninterrupted Flow Highway from a Level of Service perspective, even though it is designated as Principal Arterial. There are no traffic signals that disrupt

traffic flow that would require the use of any other service volumes. The definitions are clear and are not dependent on the classification of the roadway.

2. *SR 80 (Palm Beach Blvd) is a state-maintained principal arterial (signalized) located in the 'Rural Developed' area. The applicant must update tables 1A, 2A, 3A, and 4A by utilizing the corresponding LOS volume data for this facility from the 'State Signalized Arterials' section of table 9 from 'FDOT 2020 Quality/ level of Service Handbook*

The Level of Service Thresholds for SR 80 are taken from Table 9 from the FDOT Q/LOS Manual. The volumes utilized for the SR 80 segments are for Uninterrupted flow Highways as there are no traffic signals on these segments along SR 80 for more than 2 miles, meeting the clear definition as defined by FDOT for a Uninterrupted Flow Highway. This is NOT a signalized arterial.

- 3 . *As the project site is vacant, to evaluate short-range impacts (5-year horizon), the trips generated from table 3 (for proposed land use) must be employed to calculate the AM/PM project traffic. Consequently, table 4A must be updated accordingly.*

This is an analysis of the impacts of the CHANGE in the Comprehensive Land Use Plan. The analysis examines the CHANGE of the land use, therefore, the traffic analysis also analyzes the CHANGE in the traffic. The Short Term analysis analyzes the CHANGE that will occur as a result of the requested land use change, which is the trip generation illustrated in Table 4 of the TIS, not Table 3. No changes were made to the Short Term analysis.

If you have any additional questions, please do not hesitate to contact us.

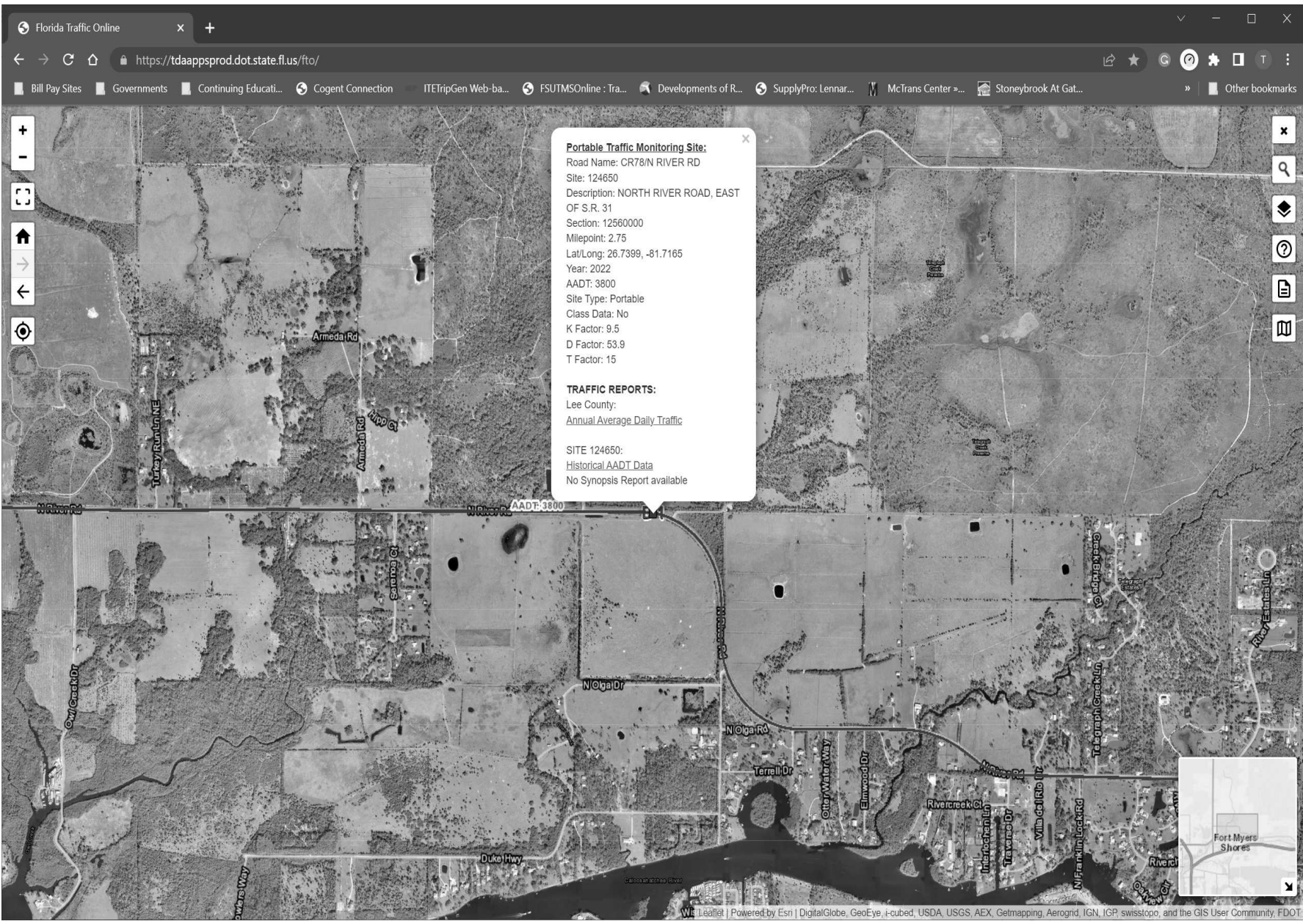
Sincerely,



Ted Treesh, PTP  
President

#### Attachments





**Portable Traffic Monitoring Site:**

Road Name: CR78/N RIVER RD  
 Site: 124650  
 Description: NORTH RIVER ROAD, EAST OF S.R. 31  
 Section: 12560000  
 Milepoint: 2.75  
 Lat/Long: 26.7399, -81.7165  
 Year: 2022  
 AADT: 3800  
 Site Type: Portable  
 Class Data: No  
 K Factor: 9.5  
 D Factor: 53.9  
 T Factor: 15

**TRAFFIC REPORTS:**

Lee County:  
[Annual Average Daily Traffic](#)

SITE 124650:  
[Historical AADT Data](#)  
 No Synopsis Report available

