



Lee County  
*Southwest Florida*

## Board of County Commissioners

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January 31, 2024

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Tom Sacharski, AICP  
RVI Planning and Landscape Architecture  
8725 Pendery Place, Suite 101  
Bradenton, FL 34201  
**Via E-mail Only:** [tsacharski@rviplanning.com](mailto:tsacharski@rviplanning.com)

**RE: CPA2023-00012 and CPA2023-00013**

### **Babcock Ranch Text & Map Amendments**

Dear Mr. Sacharski:

Staff has reviewed the application submittal for the map and text Amendments CPA2023-00012 and CPA2023-00013, stamped "received" on December 27, 2023. Planning staff finds that the application materials for both applications are insufficient and further information is needed. The comments in this letter apply to both CPA applications. Please revise all application materials as necessary.

### **PLANNING**

1. Revise the application to indicate that the comprehensive plan amendments are "Expedited State Review," not "State Coordinated Review."
2. The list of parcels/property owners only includes the Babcock-owned properties and excludes the Pulte-owned properties. Please clarify why the Pulte parcels were omitted, and if necessary revise the Parcel list to include all property owners within the area involved in this application.
3. Provide a Letter of Availability for Fire, EMS, and solid waste. Per application requirement # 3 of the FLUM amendment, Letters of Availability are required for Fire, EMS, Law Enforcement, Solid Waste, Mass Transit, and Schools. The application included letters from the Sheriff's Department, Water/Sewer, and Schools but did not include Fire, EMS, or solid waste.
4. Provide density calculations showing the existing FLU allowances (New Community/Wetlands), proposed density allowances (New Community/Wetlands), and what has already been constructed (existing/proposed units, including the number of ALF units). This information is included in the application materials but could be summarized into one table.
5. Per FLUM Amendment application Requirement #1, under internal consistency with the Lee Plan, provide some discussion on how the proposed amendment will impact the Lee County population projections in Table 1(b) and the total population capacity of the FLUM.

6. Per FLUM Amendment application requirement #3, under Internal Consistency with the Lee Plan, describe how the proposal impacts the adjacent jurisdiction's comprehensive plans.
7. List State Policy Plan and Regional Policy Plan goals, strategies and actions, and policies that are relevant to this plan amendment.
8. A couple of the policy references included in the application are from an older version of the Lee Plan. Revise those references as necessary. In addition, respond to the following Lee Plan Policies:
  - a. Objective 4.1, regarding Water and Sewer;
  - b. Objective 17.3, Public Input, and provide documentation on the public meeting if the meeting has already occurred;
  - c. Goal 54, [Water] Conservation;
  - d. Goal 71, Energy Conservation;
  - e. Policy 72.2.2 regarding new residential development and hurricane evacuation; and
  - f. Policy 135.1.12 regarding affordable housing.

## **ZONING**

9. Indicate if the DRI will be amended to reduce the hotel units from 600 rooms to 250 rooms.
10. Explain in the narrative how the 350-room reduction affects the project.
11. Revise the environmental documents to state the current FLUCCS of each wetland area being revised to Wetland FLUC. Indicate if these areas were proposed to be restored, created, or preserved areas. Indicate how proposing to add these areas to the Wetland FLUC affects the project.

## **ENVIRONMENTAL**

12. Please provide an analysis of Lee Plan policy 126.1.1 and 126.1.4.
13. Please provide a jurisdictional determination approved by South Florida Water Management or the Florida Department of Environmental Protection to support the request. The Environmental Impacts/Benefits Analysis stated that the jurisdictional wetlands were considered binding by SFWMD, but the applicable permit was not provided.

## **TRANSPORTATION**

14. A detailed comparative analysis of the trip generation data from both the proposed and approved developments is required. This analysis should provide insights into the changes between the two scenarios.
15. Conduct a Short-term (5 years) segment LOS analysis for the nearest or abutting arterial and major collector segments, as identified in the Transportation Inventory. Ensure adherence to the trip generation and roadway segment LOS analysis criteria outlined in AC-13-17.

16. Exhibits 2-1, 2-2, 2-3, 3-1, 3-2, 3-3, and Appendix B (D1RPM Zonal Data) need more clarity due to poor resolution and presentation. Kindly provide these exhibits in a more presentable format, and if feasible, send the raw files for improved reviewability.
17. Provide the changes in Level of Service (LOS) for roadway segments, comparing both the proposed and approved developments. This analysis should encompass both Short-term (5 years) and Long-range (2045) perspectives.

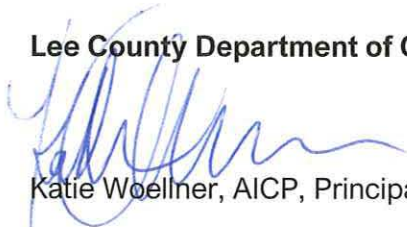
#### **LEGAL DESCRIPTION**

18. The application submittal does not include the required legal description documentation. Submit a Signed/Sealed Legal Description and Sketch of the Description for each of the proposed Future Land Use designations. Wetlands future land use boundaries will be determined by using the methodology in Fla. Admin. Code R. 17-340 as ratified and amended in § 373.4211, Fla. Stat. A Jurisdictional Determination approved by SFWMD or Florida DEP must be submitted prior to the issuance of such an interpretation.

Please feel free to contact staff at (239) 533-8362 or [kwoellner@leegov.com](mailto:kwoellner@leegov.com) if you have any questions.

Respectfully,

**Lee County Department of Community Development**



Katie Woellner, AICP, Principal Planner, Planning Section

CC: case file