



January 31, 2024

Katie Woellner, AICP  
Principal Planner  
Lee County Community Development, Zoning Section  
1500 Monroe Street  
Fort Myer, FL 33908

RECEIVED  
FEB 06 2024

COMMUNITY DEVELOPMENT

**Re: Royal Palm Multifamily CPA – Map Amendment  
1<sup>st</sup> INSUFFICIENCY RESPONSE LETTER  
CPA2023-00011**

Dear Katie:

Enclosed please find responses to your insufficiency letter dated *January 23, 2024*. The following information has been provided to assist with the approval process:

1. Revised Exhibit M7 – Boundary Survey
2. Revised Exhibit M11 – Lee Plan Narrative
3. Revised Exhibit M14 – Public Facilities
4. Revised Exhibit M15 – Traffic Impact Statement
5. Revised Exhibit M17 – Letters of Determination of Availability
6. Revised Exhibit M18 – State Policy
7. Revised Exhibit M19 – Justification of Proposed Amendment
8. New Exhibit M12 - Risk Evac Analysis\_Comp 01.30.2024

The following is a list of staff comments with our responses in **bold**:

**PLANNING COMMENTS**

1. Letters of Availability:

- a. The Fire Letter of Availability was missing. The application materials only included the request letter, not the agency’s response.
- b. Provide the Letter of Availability request letters for EMS, Schools, Solid Waste, Law Enforcement, archaeological, and parks.

**RESPONSE: Exhibit M17 is revised and contains all the letters received. Lee Tran and Fire is included.**

2. The application materials need to provide direct support for the Comprehensive Plan Amendment, not the rezone. Exhibit M11 also includes analyses and discussion relating to the rezone which are not relevant to the FLUM amendment. Revise the analyses for Policies 2.2.1, 5.2.4, 61.3.6, 61.3.7, 125.1.2, and 125.1.3 so that they directly relate to the FLU map amendment.

**RESPONSE: Exhibit M11 narrative has been revised to better focus on the comprehensive plan amendment for the sections noted.**



3. The analysis provided for Policy 101.1.4 in Exhibit M11 states to see an attached report which was not included in the FLUM amendment application. Include this report and summarize the findings to verify compliance with the Lee Plan policy.

**RESPONSE: The report is attached as Exhibit M12 - Risk Evac Analysis\_Comp 01.30.2024.**

4. Exhibit 18, State Policy and Regional Policy Plan, #22 states that the map amendment from Central Urban to Intensive Development does not alter the density or allowance for population to occupy the parcel; however, this map amendment does increase the density allowed on the parcel. Additionally, as stated in other places in the application, this property flooded during hurricane Ian which conflicts with the statement, "This is an ideal place for quick and effective evacuation and a proper place for density as it is inland out of most major dangers such as flooding or tidal surges." Reword this consistency statement to better reflect the conditions on site.

**RESPONSE: Wording has been rewritten to be more accurate.**

**JR Evans has prepared a risk evacuation analysis report, attached as Exhibit M12 - Risk Evac Analysis\_Comp 01.30.2024, to demonstrate safe evacuation given the potentially increased population density.**

5. The following typos need to be addressed:
  - a. Page 1 of Exhibit M11, the Lee Plan Analysis, part II, paragraph 2 references designating the property as part of the Lee County Utilities service area. This property is already within the LCU service area. Provide clarification of this request or remove the statement.

**RESPONSE: Addressed.**

- b. The analyses for Standard 4.1.3 and Policy 54.1.6 state that Reuse is available on site; however, the utilities availability letter stated that no reuse lines were in the vicinity. Clarify where this reuse is coming from or revise to be consistent with the LCU availability letter.

**RESPONSE: Addressed. Reuse is not available.**

- c. Exhibit 14, page 1, Comprehensive Plan Amendment (Maps), paragraph 2 includes a reference to the General Interchange FLUC.

**RESPONSE: Addressed.**

- d. Exhibit M18, Page 4, last paragraph includes another reference to General Interchange.

**RESPONSE: Addressed.**

- d. Exhibit M19, Page 3, paragraph 1 states, "the difference lies in the fact that the Intensive Development allows for bonus density." The existing Central Urban FLUC allows for Bonus Density too. Clarify that the proposed FLUC allows more bonus density.

**RESPONSE: Addressed.**

f. The analysis for Policy 95.1.3(3) states that the property "is intended to be developed as part of the existing CPD, as amended." The companion rezone is to RPD. Revise.

**RESPONSE: Addressed.**

g. The analysis for policy 5.1.1 states that this is an application to rezone the property. This application is for a FLUM amendment.

**RESPONSE: Analysis is NA to FLUM amendment. Removed.**

#### **LEGAL DESCRIPTION/SURVEY COMMENTS**

6. The sketch of the subject property does not include a state plane coordinate at the point of beginning (POB) and a second point at an opposing corner. The legal description of the property does not include the directional call for the centerline of Phillips Creek as it shows in the sketch, the sketch does not include the length of the first call (POC to POB) as it does in the description, and several other directional calls within the legal description are inconsistent with the sketch.

**RESPONSE: A revised Boundary Survey and Sketch and Description is included in the resubmittal as Exhibits M7.**

#### **TRANSPORTATION COMMENTS**

7. Tables 1A and 3A require revision, as the LOS standard for Winkler Rd. (North of College Pkwy) appears inaccurate. Additionally, kindly make any necessary updates in the Transportation Impact Study (TIS) to reflect this change.

**RESPONSE: A revised Traffic Impact Statement is in the submittal addressing the changes requested.**

8. Table 2A also requires revision, specifically concerning the accuracy of the K-factor and D-factor for most segments. Please refer to the Lee County Traffic Count Report and the Florida Traffic Online Webpage for accurate information. Furthermore, the estimation of Peak Hour Peak Directional Project Traffic should be based on the peak directional count (133) generated from the development.

**RESPONSE: A revised Traffic Impact Statement is in the submittal addressing the changes requested.**

If you have any further questions, please do not hesitate to contact me directly at (239) 318-6707 or [fdrovdlic@rviplanning.com](mailto:fdrovdlic@rviplanning.com).

Sincerely,

**RVi** Planning + Landscape Architecture



**Fred Drovdljic, AICP**  
Planning Director



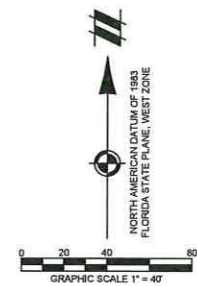


**SURVEYOR'S LEGEND**

<p>Abbreviations</p> <ul style="list-style-type: none"> <li>PSM PROFESSIONAL SURVEY &amp; MAPPER</li> <li>LS LICENSED SURVEYOR</li> <li>LB LICENSED BUSINESS</li> <li>IRC IRON ROD &amp; CAP</li> <li>MHS MAINHOLE</li> <li>MHD DRAINAGE MAINHOLE</li> <li>MES MITERED END SECTION</li> <li>INV INVERT</li> <li>RCP REINFORCED CONCRETE PIPE</li> <li>CMF CORRUGATED METAL PIPE</li> <li>R/W RIGHT-OF-WAY</li> <li>OR OFFICIAL RECORD</li> <li>NO. NUMBER</li> <li>(M) MEASURED</li> <li>(C) DESCRIBED</li> <li>(C) CALCULATED BASED ON FIELD MEASUREMENTS</li> <li>ID IDENTIFICATION</li> <li>DELTA</li> <li>L LENGTH</li> <li>CH.B CHORD BEARING</li> <li>CH.D CHORD DISTANCE</li> <li>D.B. DEED BOOK</li> <li>P.G. PAGE</li> <li>O.R.B. OFFICIAL RECORD BOOK</li> </ul>	<p>Symbol Legend</p> <ul style="list-style-type: none"> <li>Denotes</li> <li>SIGN</li> <li>GLY ANCHOR</li> <li>MAILBOX</li> <li>AERIAL TARGET</li> <li>CONCRETE MONUMENT FOUND</li> <li>CONCRETE POWER POLE</li> <li>DRAINAGE INLET</li> <li>FIRE HYDRANT</li> <li>IRON ROD</li> <li>TRANSFORMER</li> <li>ELECTRIC CABINET</li> <li>LIGHT POLE</li> <li>SANITARY SEWER MANHOLE</li> <li>STORM DRAINAGE MANHOLE</li> <li>ELECTRIC METER</li> <li>MITERED END SECTION</li> <li>OK TREE</li> <li>PALM TREE</li> <li>PALM TREE</li> <li>PINE TREE</li> <li>TELEVISION RISER</li> <li>TELEPHONE RISER</li> <li>ELECTRIC RISER</li> <li>WOODEN POWER POLE</li> <li>MEAN HIGH WATER FLAG</li> </ul>
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<ul style="list-style-type: none"> <li>○ GUARDRAIL</li> <li>— SS STORM DRAINAGE LINE</li> <li>— SS SANITARY SEWER LINE</li> <li>— SD SUBJECT PROPERTY LINE</li> <li>— ADJACENT PROPERTY LINE</li> <li>— EASEMENT LINE</li> <li>— RIGHT-OF-WAY LINE</li> <li>— WATER'S EDGE LINE</li> <li>— FEMA FLOOD LINE</li> </ul>	<ul style="list-style-type: none"> <li>□ BUILDING</li> <li>▨ ASPHALT PAVEMENT</li> <li>▩ CONCRETE</li> </ul>
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FLORIDA SURVEY CERTIFICATE OF AUTHORIZATION # LB 7182

REV	DRAWN	DATE	COMMENTS
1	T.M.B.	12-25-23	ADD 2 CONTAMINATED AREA STAKES AND UTILITIES FROM COUNTY AND NEW OPINION OF TITLE
2	M.C.T.W.B.	01-30-24	

LOCATED IN: SECTION 35  
TOWNSHIP 45 SOUTH, RANGE 24 EAST  
PARCEL ID: 35-45-24-L2-0500R-00CE  
15100 MEADOW CIRCLE  
UNINCORPORATED AREAS, LEE COUNTY, FLORIDA, 33908

**ALTAIRNSPS LAND TITLE SURVEY**  
MAP OF  
**BOUNDARY AND TOPOGRAPHIC SURVEY**  
OF  
**ROYALE PALMS**

FIELD BOOK	PAGES

DWG. KH	CH. ED
PM. TVB	
FIELD DATE: 07/25/2023	
PLOT DATE: 01/31/2024	
JOB 23001930	
SHEET NO. 2 OF 3	



**ROYAL PALM VILLAGE**  
LEGAL DESCRIPTION OF SKETCH

A TRACT OR PARCEL OF LAND LYING IN THE NORTHEAST 1/4 OF SECTION 35, TOWNSHIP 45 SOUTH, RANGE 24 EAST, LEE COUNTY, FLORIDA, FURTHER DESCRIBED AS FOLLOWS:

COMMENCE AT THE NORTHEAST CORNER OF SAID SECTION 35; THENCE RUN NORTH 89°41'34" WEST, ALONG THE NORTH LINE OF THE NORTHEAST 1/4, OF SAID SECTION 35, A DISTANCE OF 253.80 FEET, MORE OR LESS TO A CONCRETE MONUMENT, BEING THE NORTHWESTERLY CORNER OF A PARCEL AS RECORDED IN OFFICIAL RECORDS BOOK 994, PAGE 648, PUBLIC RECORDS OF LEE COUNTY, FLORIDA, AND THE POINT OF BEGINNING OF THE PARCEL HEREIN DESCRIBED: FROM SAID POINT OF BEGINNING CONTINUE NORTH 89°41'34" WEST ALONG SAID NORTH LINE OF THE NORTHEAST 1/4, OF SECTION 35, A DISTANCE OF 412.41 FEET, TO THE NORTHWEST CORNER OF THE EAST 1/2 OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 35; THENCE RUN SOUTH 00°11'51" WEST, ALONG THE WEST LINE OF SAID FRACTION, 1322.21 FEET, MORE OR LESS, TO THE SOUTHWEST CORNER OF SAID FRACTION; THENCE CONTINUE SOUTH 00°11'51" WEST, FOR 78.00 FEET, MORE OR LESS, TO THE CENTERLINE OF PHILLIPS CREEK; THENCE RUN NORTHEASTERLY ALONG THE MEANDER OF SAID CENTERLINE OF PHILLIPS CREEK TO ITS INTERSECTION WITH THE SOUTH LINE OF THE NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF SAID SECTION 35; THENCE RUN SOUTH 89°24'41" EAST, ALONG SAID SOUTH LINE, 332.25 FEET, MORE OR LESS, TO THE SOUTHEAST CORNER OF SAID NORTHEAST 1/4 OF THE NORTHEAST 1/4 OF SECTION 35; THENCE RUN NORTH 00°16'20" EAST, ALONG THE EAST LINE OF SAID SECTION 35, 1009.27 FEET, MORE OR LESS, TO A CONCRETE MONUMENT ON THE SOUTHWESTERLY RIGHT OF WAY LINE OF U.S. 41, (S.R. #45) (TAMIAMI TRAIL), SAID CONCRETE MONUMENT IS A P.C. OF A CURVE TO THE RIGHT, HAVING FOR ITS ELEMENTS A RADIUS OF 2932.79 FEET, A DELTA ANGLE OF 02°07'51", AN ARC OF 109.07 FEET, AND A CHORD BEARING OF NORTH 19°01'22" WEST; THENCE RUN ALONG SAID CURVE TO THE RIGHT, FOR 109.07 FEET TO A CONCRETE MONUMENT, BEING THE SOUTHEASTERLY CORNER OF A PARCEL AS RECORDED IN OFFICIAL RECORDS BOOK 994, PAGE 648, PUBLIC RECORDS OF LEE COUNTY, FLORIDA; THENCE RUN SOUTH 78°51'01" WEST, ALONG THE SOUTHERNLY LINE OF SAID PARCEL, 150.51 FEET TO A CONCRETE MONUMENT; THENCE RUN NORTH 15°49'59" WEST, FOR 253.17 FEET TO THE POINT OF BEGINNING.

**SURVEYOR'S NOTES**

1. THIS LEGAL DESCRIPTION IS NOT VALID IF PRINTED, OR WITHOUT THE ORIGINAL SIGNATURE AND RAISED SEAL OF THE PROFESSIONAL SURVEYOR AND MAPPER SHOWN HEREON.
2. NO ABSTRACT FOR RIGHTS-OF-WAY, EASEMENTS, OWNERSHIP, OR OTHER INSTRUMENTS OF RECORD HAVE BEEN PROVIDED BY THIS FIRM.
3. THE "LEGAL DESCRIPTION" HEREON HAS BEEN PREPARED BY THE SURVEYOR AT THE CLIENT'S REQUEST.
4. THIS SKETCH DOES NOT REPRESENT A FIELD SURVEY, AS SUCH.
5. THE DELINEATION OF LANDS SHOWN HEREON IS AS PER THE CLIENT'S INSTRUCTIONS.
6. THIS LEGAL DESCRIPTION DOES NOT CONSTITUTE A BOUNDARY SURVEY, AS SUCH.
7. ATTENTION IS DIRECTED TO THE FACT THAT THIS MAP MAY HAVE BEEN REDUCED IN SIZE BY REPRODUCTION. THIS MUST BE CONSIDERED WHEN OBTAINING SCALED DATA.
8. BEARINGS SHOWN HEREON ARE ASSUMED, DERIVING A BEARING OF N89°09'08"E ALONG THE NORTH LINE OF SECTION 35, TOWNSHIP 45 SOUTH, RANGE 24 EAST.

**LEGEND & SYMBOLS**

- POB = POINT OF BEGINNING
- POC = POINT OF COMMENCEMENT
- POT = POINT OF TERMINATION
- R/W = RIGHT-OF-WAY
- SEC = SECTION
- PID = PARCEL IDENTIFICATION
- PB = PLAT BOOK
- ORB = OFFICIAL RECORDS BOOK
- PG = PAGE
- SQ.FT. = SQUARE FEET
- AC = ACRES
- AKA = ALSO KNOWN AS
- (C) = CALCULATED DATA
- (D) = RECORDED DATA
- (M) = MEASURED DATA



**SURVEYOR'S CERTIFICATE**

I HEREBY CERTIFY THAT ALL PARTS OF THIS SKETCH HAVE BEEN COMPLETED IN ACCORDANCE WITH THE REQUIREMENTS OF THE STANDARDS OF PRACTICE FOR SURVEYING IN THE STATE OF FLORIDA, 5J-17, F.A.C., TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF. NOT VALID WITHOUT A SIGNATURE AND RAISED SEAL FROM THE SURVEYOR.

**Tracy W  
Birch**

**Tracy W Birch**  
**2024.01.31**  
**06:22:54 -05'00'**

TRACY W. BIRCH, P.S.M.  
FLORIDA LICENSE #5579

DATE

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**FLOURNOY DEVELOPMENT GROUP**

THIS SKETCH IS NOT A SURVEY

SHEET	1	OF	3
DRW:	MC	CHK:	TB
		PM:	TB
SEC:	35	TWN:	45S
		RNG:	24E
PLOT DATE: 2024-01-31			
FILE: 23001930 ROYAL PALM VILLAGE-SOD			

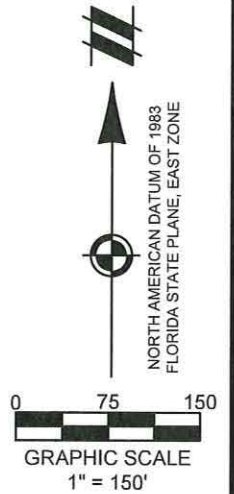
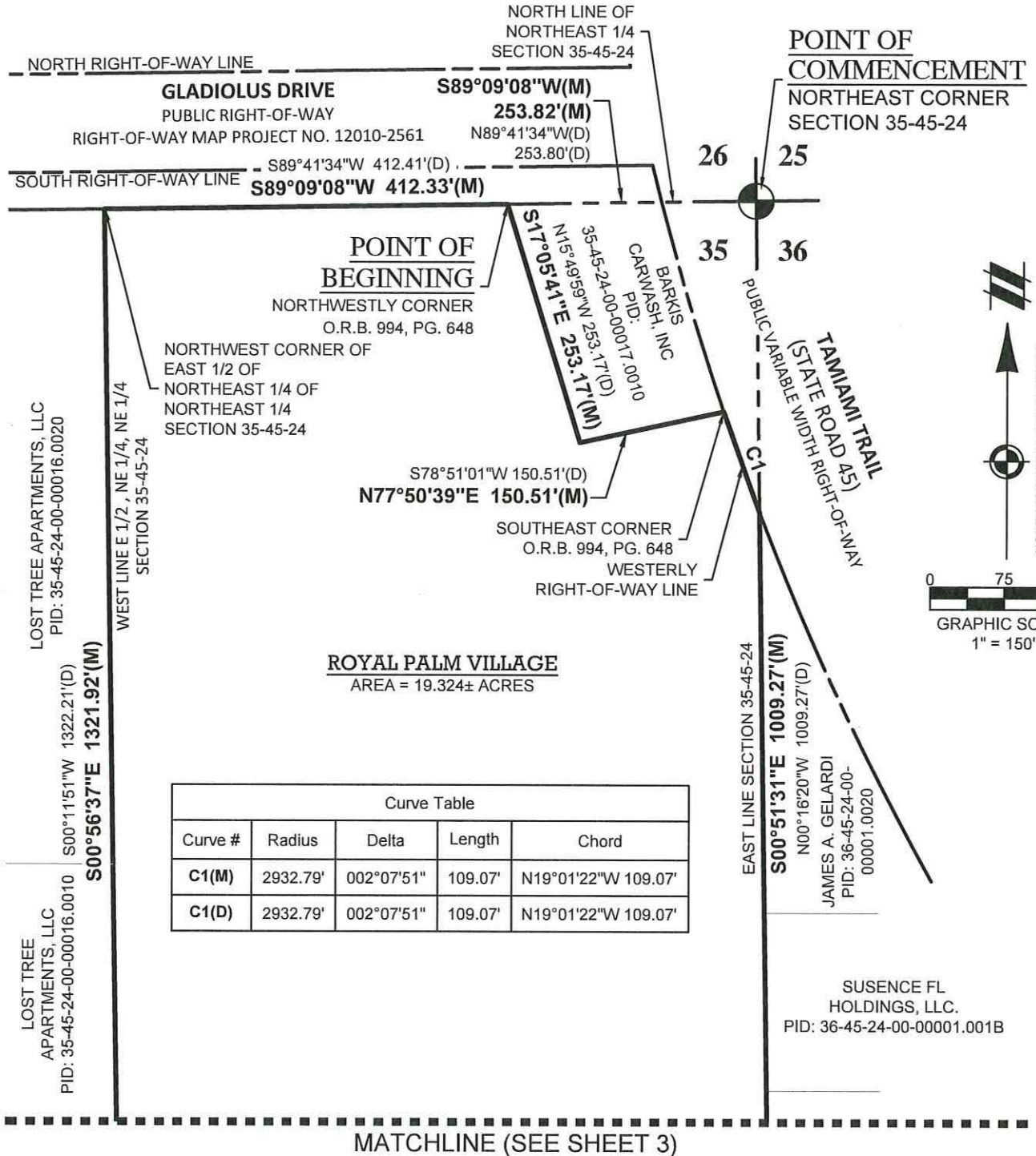


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# ROYAL PALM VILLAGE

SKETCH OF LEGAL DESCRIPTION



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## CERTIFICATION

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SHEET	2	OF	3
DRW:	MC	CHK:	TB
SEC:	35	TWN:	45S
		RNG:	24E
PLOT DATE: 2024-01-31			
FILE: 23001930 ROYAL PALM VILLAGE-SOD			



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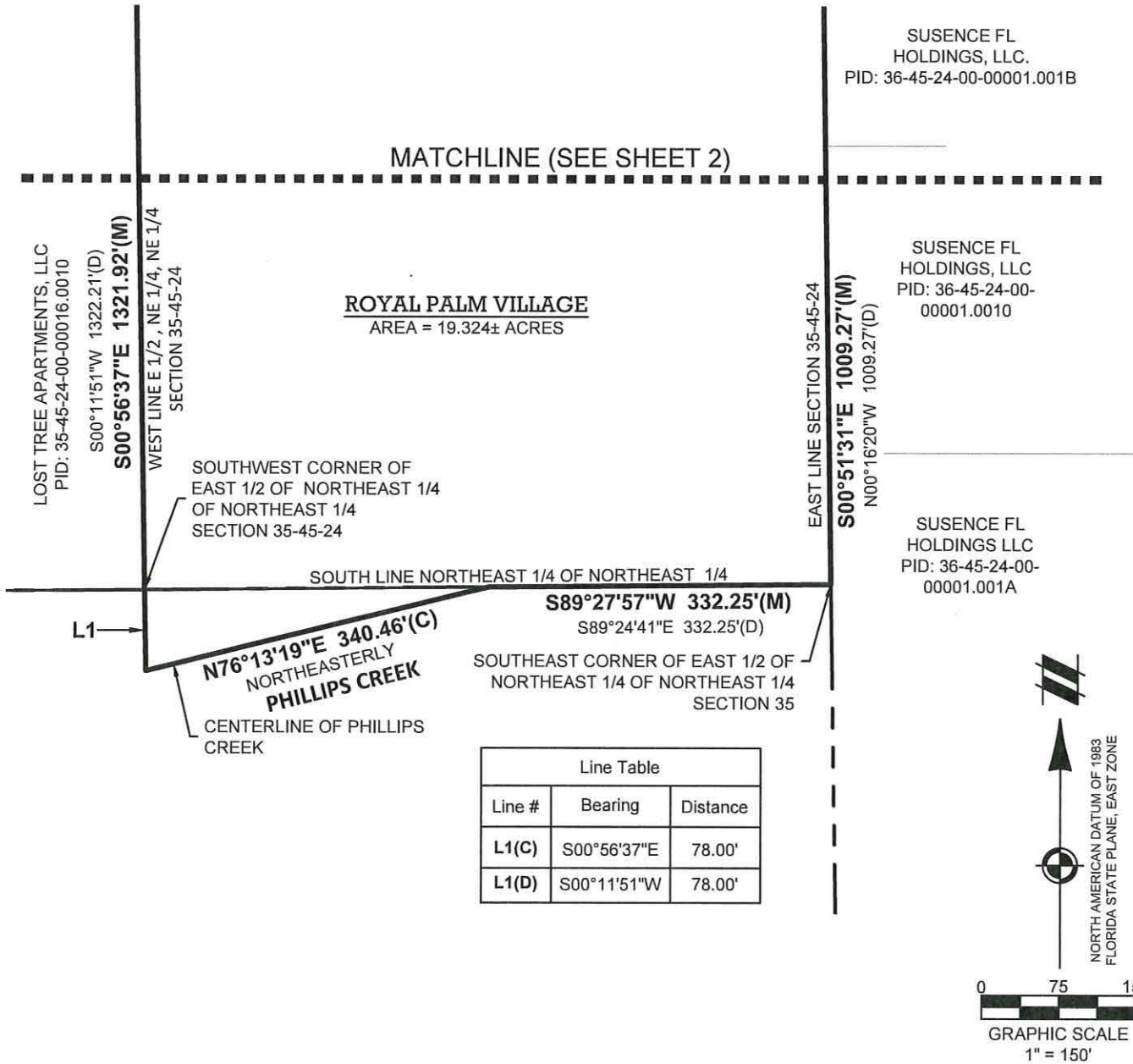
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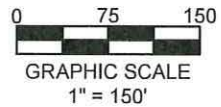


# ROYAL PALM VILLAGE

SKETCH OF LEGAL DESCRIPTION



Line Table		
Line #	Bearing	Distance
L1(C)	S00°56'37\"E	78.00'
L1(D)	S00°11'51\"W	78.00'



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### CERTIFICATION

THIS SKETCH IS NOT A SURVEY		
SHEET	3	OF 3
DRW:	MC	CHK: TB PM: TB
SEC:	35	TWN: 45S RNG: 24E
PLOT DATE: 2024-01-31		
FILE: 23001930 ROYAL PALM VILLAGE-SOD		

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# Royal Palm Multifamily CPA

## Exhibit M11 – Lee Plan Analysis

### I. REQUEST

Flournoy Development Group (“Applicant”) seeks to redevelop the former Royal Palm Village mobile home park property, located directly southwest corner of Old Gladius Road and US Highway 41, in unincorporated Lee County, Florida. The park flooded during Hurricane Ian and since that time the Flournoy Group has worked to successfully terminate all property ownership within the park and allow for this urban infill development that will be built to new FEMA flood standards. The Applicant seeks to develop the 19.33 +/- acres to allow for 391 multifamily apartments with supporting amenities.

To accomplish the density of the development program a Comprehensive Plan Map Amendment is required. The request will be to move the property from Central Urban to Intensive Development, which allows 14 dwelling units per acre in base density and 8 dwelling units per acre in bonus density, where 255 units are derived from base density and 136 from bonus density. The property is within the Coastal High Hazard Area which restricts the option of using bonus density; therefore, the requested use of the bonus density will be for up site-built affordable housing at 140% AMI.

A new access point is proposed on US 41 to provide access to Lee Tran and interconnectivity to the multi-use pedestrian and bicycle regional network in addition to the existing access onto Old Gladiolus Drive.

A companion RPD and Bonus Density Application has been submitted as DCI2023-00049.

### II. PROPERTY HISTORY

The Property is located south of Old Gladius Road and west US Highway 41. The Property is located within the South Fort Myers Planning Community Area. The Property is currently developed as the Royal Palm Village property. Access is provided from Old Gladius Road. However, there is a drainage and stormwater management easement located on the southern portion of the property.

The Applicant has filed a Comprehensive Plan Map Amendments to change the Future Land Use (FLU) designation of the Property from “Central Urban” to “Intensive Development”.



### III. EXISTING CONDITIONS

The property is in the South Fort Myers Planning Community Area and as mentioned above, it was historically developed as the Royal Palm Village (mobile home park). The mobile home park ownership has been terminated (see attached termination agreement recorded at the Lee County Clerk) and most units have been removed.

There are no known environmentally sensitive areas on site. The site does abut, and the property line extends over a portion of Philips Creek to the south. Philips Creek is a shallow waterway that connects to Otsego Bay and is part of the Hendry Creek watershed but is only navigable near the subject property by kayaks and low drag, small boats.

The area to the north is in Intensive Development, to the east and west Central Urban, and south in the Suburban future land use category. The zoning is a mix of C-1, CC, RM-2, and AG-2 districts. The property to the north, east and west is either multifamily or commercial making this parcel a perfect infill redevelopment in a central employment center. The properties to the south are single-family homes on larger lots that are on average 170 feet from the southern property line and 350-550 feet from the nearest proposed multifamily building.

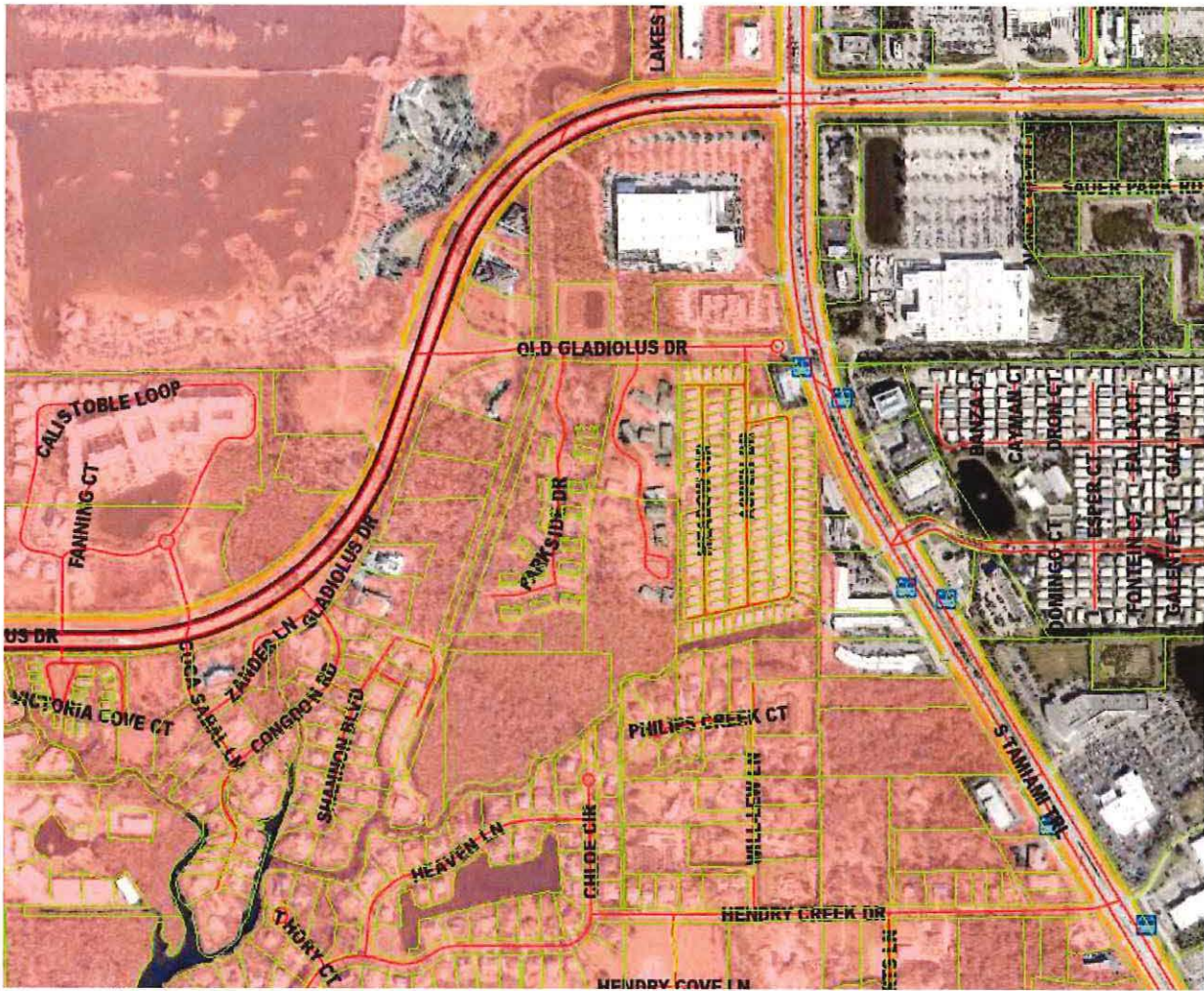
The surrounding area is as follows in the table below and map below.

**Table 1: Inventory of Surrounding Lands**

	<b>FUTURE LAND USE</b>	<b>ZONING</b>	<b>EXISTING LAND USE</b>
<b>NORTH</b>	Intensive Development	C-1	Infinity Car Dealership / retention
<b>SOUTH</b>	Central Urban / Suburban	RS-1; AG-2	Phillips Creek / Single Family Residential Homes
<b>EAST</b>	Central Urban	CC; C-1	Car Wash; Auto Shop; Speedway Gas Station, Retail Center
<b>WEST</b>	Central Urban	RM-2	Lost Tree Apartments

- **NORTH:** Old Gladius Road and the Infinity Car Dealership.
- **SOUTH:** Phillips Creek along with Single Family Residential Homes
- **EAST:** US 41 and commercial uses such as Car Wash; an Auto Shop, a Speedway Gas Station, and Retail Center
- **WEST:** The Lost Tree Multifamily apartments.

The site is not in any special overlay except the Property is within the Coastal High Hazard Area (CHHA) and Evacuation Zone A, but with no FEMA floodway concerns. The site is at the western most outskirts of the CHHA. The FEMA Flood Map places the site in the AE-11 zone.



Map 1- CHHA

Urban services are in place to serve intense development. The site has access to all major urban services including, but not limited to, public sanitary sewer and water, fire, EMS, police, parks, public schools, solid waste, transit with bus stop within 200 feet, and shared use paths.

## V. PUBLIC INFRASTRUCTURE

The Property has access to the necessary utilities to service the project and all urban services are adequate to serve the proposed development.

- Letters of availability have been secured from Lee County Utilities for water and sanitary sewer.
- Roadways have adequate capacity as the site, as proposed, will have direct access onto US 41, a state maintained principal arterial, and secondary access to Gladiolus Drive, a Lee County maintained arterial via Old Gladiolus Drive Lee County local road.
- Lee Tran states the proposed development is within one-quarter mile of a fixed-route corridor and the closest bus stop is # 11490. Bus serves the South Fort Myers Area by via Route 140 (Merchants Crossing/Bell Tower) and Route 240 (Coconut Point Mall/Bell Tower) located at the car wash directly adjacent to the property (approximately less than 200 ft.) on both the northbound and southbound travel lanes along the US Highway 41 roadway.

- The US 41 proposed access provides connection to the shared use path on the west side of US 41.
- The site entrance onto Old Gladiolus Drive is within ¼ mile of the shared path on Gladiolus Drive and the Lakes Park regional Lee County Park.
- South Trail Fire Station #63 is within one mile of the site north on US 41 to Harper Road.
- The Lee County Sheriff's South District primary substation is within one mile as is an EMS substation on Six Mile Cypress Parkway.

## VII. LEE PLAN COMPLIANCE

The following is an analysis of the Comprehensive Plan Amendment, and the companion Residential Planned Development, meets consistency with goals, objectives and policies of the Lee County Comprehensive Plan (Lee Plan).

**POLICY 1.1.2: The Intensive Development future land use category is located along major arterial roads. By virtue of their location, the County's current development patterns, and the available and potential levels of public services, areas with this designation are suited to accommodate high densities and intensities. Mixed use developments of high-density residential, commercial, limited light industrial, and office uses are encouraged to be developed as described in Objective 11.1, where appropriate. The standard density range is from eight dwelling units per acre (8 du/acre) to fourteen dwelling units per acre (14 du/acre), with a maximum total density of twenty-two dwelling units per acre (22 du/acre). The maximum total density may be increased to thirty dwelling units per acre (30 du/acre) utilizing Greater Pine Island Transfer of Development Units. (Ord. No. 94- 30, 09-06, 10-10, 16-07, 21-09).**

The property is currently in the Central Urban FLUC and proposed to be in the Intensive Development FLUC. Both categories encourage uses that best serve the local residents and commuter traffic including dense multifamily development, particularly where urban services are present, and is near employment centers. As discussed in the existing conditions, this site in an excellently placed redevelopment with all urban level services in proximity with available capacities. It replaces a mobile home park that was in a risk area for flooding from tidally influenced waters abutting to the south. New construction at the proper flood elevations of a hurricane resistant multifamily structure is an appropriate infill development.

The property is in the Coastal High Hazard Area which restricts the option to build bonus density to site built affordable housing only. Therefore, the plan is to apply for a land use change to Intensive Development via Map Amendment. In the Intensive Category, this would allow for 14 du/acre of market rate units with an additional 8 du/acre available via bonus density as site-built affordable housing (140% AMI). The affordable housing restriction is not monitored by the state but by Lee County and expires after seven full years of operations. Our intended plan is to develop 391 units, or 21.5 units per acre. Therefore, sufficient acreage is allocated for the proposed development.

The applicant met with Lee County staff to discuss this methodology and staff appeared receptive to this entitlement change request. The request will need to satisfy criteria for hurricane evacuation times and be subject to hurricane impact mitigation.

**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, prevent development patterns where large tracts of land are by-passed in favor of development more distant from services and existing communities.

The comprehensive plan map change to Intensive development to allow more density and bonus units for affordable housing, coupled with the proposed rezoning, will allow for a compact development pattern in an area intended for urban levels of intensity and density and permit redevelopment of infill units near transit and employment centers, as well as regional park and shared use path system.

The Intensive Land Use category and redevelopment proposed is in direct compliance with this and other policies in the Lee Plan. All urban services are available to the sight with major employment centers in close proximity and transit service within ¼ mile.

As outlined in detail within the comprehensive plan and zoning applications, the project provides for compatibility with the surrounding mixed uses of moderately high-density residential development and commercial uses. Development within the project is compacted with four 4-story buildings providing sufficient open space and supporting amenities. Long existing multifamily developments are located directly west of the Property. As a result, this RPD makes efficient use of this planned extension of infrastructure and eliminates development patterns dependent on well and septic as Lee County Utilities has stated they have capacity to serve the increased density proposed.

**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 F.S. 163.3164(7)) will be granted only when consistent with the provisions of Sections 163.3202(2)(g) and 163.3180, Florida Statutes and the county's Concurrency Management Ordinance.

All urban levels of service are available with capacity. The Property is contiguous to developed or developing properties along US 41, representing logical and efficient growth within the Central Urban or Intensive Development FLUC. The Applicant has provided letters of availability and a detailed explanation of the public facilities and services available to support future development of the Property. The proposed rezoning fully complies with the above policy's intent to direct new growth to appropriate Future Urban Areas of the county.

**POLICY 2.2.1: Rezoning's and Development of Regional Impact proposals will be evaluated as to the availability and proximity of the road network; central sewer and water lines; community facilities and services such as schools, EMS, fire and police protection, and other public facilities; compatibility with surrounding land uses; and any other relevant facts affecting the public health, safety, and welfare.**

The road network in the region has been constructed to support the character of the area with direct access (proposed) onto a major arterial (US 41) and access to Summerlin Road, a second major arterial via Old Gladiolus Drive, both roads with capacity.

The Property is located within Lee County Future Water and Sewer Franchise Areas and will connect to both sewer and water service. The property is near existing networks, utility

services and compatible, similar land uses. The utility service area currently abuts the eastern boundary.

There are adequate public facilities and services in the immediate vicinity of the project to serve the proposed development in terms of schools, fire, EMS and Sheriff's protection.

The proposed Master Concept plan provides compatibility with surrounding areas through the provision of expansive preserve areas and significant distances between residential lots and the project boundary.

As a result, the proposed development is completely internalized from surrounding development. Finally, buffering, maximum building heights, and development standards are similar to other planned developments approved in the South Fort Myers Planning Community.

#### **GOAL 4**

***OBJECTIVE 4.1: WATER, SEWER, AND ENVIRONMENTAL STANDARDS. Consider water, sewer, and environmental standards during the rezoning process. Ensure the standards are met prior to issuing a local development order. (Ord. No. 17-13)***

##### **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).***

The site is currently serviced by Lee County Utilities for sewer and water and has capacity to continue serving the increased density proposed. A letter of utility availability has been secured from LCU.

- 2. If the proposed development lies within the boundaries of a water utility's certificated or franchised service area, or Lee County Utilities' future potable water service area (see Map 4- A), then the development must be connected to that utility.***

According to Lee Plan Map 4-A and 4-B the site lies within the LCU Future Sewer and Water Service Area. The project will connect to Lee County Sewer and Water Service.

- 3. The developer must provide proof that the prior commitments of the water utility, plus the projected need of the developer, do not exceed the supply and facility capacity of the utility.***

We have received a letter of utility availability from LCU that states service and capacity is available to serve the projected needs of this sight.

- 4. All waterline extensions to new development will be designed to provide minimum fire flows, as well as adequate domestic services as required by Fla. Admin. Code R. 62-555.***

There is current service to the site so no need for expanded service lines.

5. ***If a new development is located in a certificated or franchised service area, or Lee County Utilities' future potable water service area (see Map 4-A), and the utility cannot provide the service or cannot provide the service except at a clearly unreasonable cost to the developer, the developer is encouraged to petition the appropriate regulatory agency to contract the service area so that the development may establish its own community water system or invite another adjacent utility to expand its service area in order to provide the required service.***

According to Lee Plan Map 4-A and 4-B the site lies within the LCU Future Sewer and Water Service Area. The site is served by LCU and the project will connect to Lee County Sewer and Water Service.

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.***

Not applicable.

7. ***Lee County Utilities may provide potable water service to properties not located within the future water service area when such potable water service is found to benefit public health, safety, and welfare, including protection of Lee County's natural resources.***

Not applicable.

**STANDARD 4.1.2: SEWER.**

1. ***Any new residential development that exceeds 2.5 dwelling units per gross acre, and any new single commercial or industrial development that generates more than 5,000 gallons of sewage per day, must connect to a sanitary sewer system.***

The site is currently serviced by Lee County Utilities for sewer and water and has capacity to continue serving the increased density proposed. A letter of utility availability has been secured from LCU that states there is capacity for service the density proposed.

2. ***If the proposed development exceeds the thresholds listed above and lies within the boundaries of a sewer utility's certificated or franchised service area, or Lee County Utilities' future sanitary sewer service area (see Map 4-B), and that utility has sufficient capacity to provide minimum service to the development, then the development must connect to that sewer utility if there is existing infrastructure adequate to accept the effluents of the development within 1/4 mile from any part of the development.***

According to Lee Plan Map 4-B it is within the Future Sewer Service Area for Lee County. A letter of utility availability has been secured from LCU that states there is capacity for service the density proposed.



3. *If there is not sufficient capacity nor adequate infrastructure within 1/4 mile of the development, the developer must provide proof in the form of a clearly stated rejection of service.*

Not applicable.

4. *If a new development is located in a certificated or franchised service area, or Lee County Utilities' future sanitary sewer service area (see Map 4-B), and the utility cannot provide the service, or cannot provide the service except at a clearly unreasonable cost to the developer, the developer may establish on a temporary basis a self-provided sanitary sewer facility for the development, to be abated when the utility extends service to the site. The developer may also petition the appropriate regulatory agency to contract the service area of the utility in order that another utility may be invited to provide the service.*

Not applicable.

5. *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 sewer utility be expanded to incorporate the property;*
  - *establish a self-provided sanitary sewer system for the development;*
  - *develop at an intensity that does not require sanitary sewer service; or*
  - *if no more than 5000 gallons of effluent per day per parcel is produced, an individual sewage disposal system per Fla. Admin. Code R. 64E-6 may be utilized, contingent on approval by all relevant authorities.*

Not applicable.

6. *Lee County Utilities may provide sanitary sewer service to properties not located within the future sewer service area when such sanitary sewer service is found to benefit public health, safety, and welfare, including protection of Lee County's natural resources.*

Not applicable.

#### **STANDARD 4.1.3: REUSE**

According to LCU in the letter of service availability reuse is not served to this site.

#### **GOAL 5 (RESIDENTIAL LAND USES)**

**OBJECTIVE 5.1:** All development approvals for residential, commercial, and industrial land uses must be consistent with the following policies, the general standards under Goal 4, and other provisions of this plan. (Ord. No. 94-30, 00-22)

**POLICY 5.1.3: During the rezoning process, direct high-density residential developments to locations that are near employment and shopping centers; are close to parks and schools; and are accessible to mass transit and bicycle facilities. (Ord. No. 94-30)**

The request is intended to allow for the development of multifamily residential dwellings on the 19.33-acre property in the form of a Residential Planned Development subject to conditions, performance/design standards, limited schedule of uses, and a binding Master Concept Plan. The request will ensure that the property is developed with uses similar neighboring properties, thereby protecting the character and integrity of the existing communities.

- The site is within one mile of major employment businesses including but not limited to Home Depot, Lowe's Wal-Mart and an entire commercial corridor along US 41 extending a significant distance north and south.
- Lee Tran serves the South Fort Myers Area by via Route 140 (Merchants Crossing/Bell Tower) and Route 240 (Coconut Point Mall/Bell Tower) located at the car wash directly adjacent to the property (approximately less than 200 ft.) on both the northbound and southbound travel lanes along the US Highway 41 roadway.
- The US 41 proposed access provides connection to the shared use path on the west side of US 41.
- The site is entrance onto Old Gladiolus Drive is within ¼ mile of the shared path on Gladiolus Drive and the Lakes Park regional Lee County Park.

**POLICY 5.1.6: Maintain development regulations that require high-density, multi-family, cluster, and mixed use developments to have open space, buffering, landscaping, and recreation areas appropriate to their density and design. (Ord. No. 94-30)**

The proposed development will maintain the requirements for 40% open space, all required buffers, and a natural waterway 50-foot buffer on the south boundary. Amenities will be on site including pickle ball, dog park, and clubhouse with gym and meeting areas.

**POLICY 5.1.7: Maintain development regulations that require that community facilities (such as park, recreational, and open space areas) in residential developments are functionally related to all dwelling units and easily accessible via pedestrian and bicycle pathways. These pathways must be interconnected with adjoining developments and public pathways whenever possible. Townhouses, condominiums, apartments, and other types of multi-family residential development must have directly accessible common open space. (Ord. No. 94-30, 00-22).**

The proposed RPD includes 40% open space, car wash area, dog park, pickle ball courts and a community amenity center with additional recreational facilities. Sidewalks are provided on both sides of all internal roadways and provide pedestrian and bicycle connections to US 41. A multi-use pathway is located along US 41. All open space and amenities will be directly accessible to all residents within the RPD.

**POLICY 5.2.4: The site design of the proposed development must be compatible with surrounding land uses to the maximum extent possible. (Ord. No. 10-08)**

The request will ensure that the property is developed with uses similar to neighboring properties. The intensive land use category abuts this property to the north while the

development to the north and east is of intense nature that allows this to be dense urban infill with affordable bonus density units.

Impacts to surrounding land uses are minimal due to the similarity of intent and intensity of uses. The zoning conditions and LDC requirements have adequately addressed any potential impacts on adjacent uses.

The proposed RPD includes development standards which comply with the South Fort Myers Community regulations. A minimum 50-foot buffer will be provided to adjacent single-family properties to the south.

***POLICY 54.1.2: In developing and implementing local landscape regulations including the preservation, reforestation, and wetlands restoration requirements, preference will be given to native species which are adapted to the region's climatic regime.***

The site is currently developed as a mobile home park. The Project site does not contain any wetlands or surface waters. Phillips Creek is located directly south of the Property.

The attached Environmental Report did not show the existence of the listed species such as the American Alligator, Florida Burrow Owl, Gopher Tortoises, Southeastern American Kestrel, and Wood Storks on the property.

***POLICY 54.1.6: Maintain development regulations that require new development to connect to a reuse water system if a system is near the development and has sufficient capacity.***

Lee County states that reuse is available. The site will connect.

***POLICY 61.1.1: Lee County recognizes that all fresh waters are a resource to be managed and allocated wisely and will support allocations of the resource on the basis 1) of ensuring that sufficient water is available to maintain or restore valued natural systems, and 2) of assigning to any specified use or user the lowest quality freshwater compatible with that use, consistent with financial and technical constraints.***

The Applicant will obtain an Environmental Resource Permit from the South Florida Water Management District. The master drainage system and established conservation areas proposed in this amendment request, and which will be established through the ERP and subsequent development orders, are designed in compliance with this policy.

***OBJECTIVE 61.3: GENERAL SURFACE WATER MANAGEMENT STANDARDS. Lee County will continue to provide sufficient performance and/or design standards for development protective of the function of natural drainage systems.***

**POLICY 61.3.6: Require developments to provide surface water management systems, acceptable programs for operation and maintenance, and post-development runoff conditions that reflect the natural surface water flow rate, direction, quality, hydroperiod, and drainage basin.**

Please refer to the surface water management plan in Exhibit M14.

**POLICY 61.3.7: Channelization of natural streams and rivers is prohibited; channelization of other natural watercourses is discouraged.**

No change will be made to the natural stream to the south. A dog park amenity is located within the Project and is adjacent to the Phillips Creek. Regulations are in compliance with the LDC.

***POLICY 95.1.3: LOS standards will be the basis for planning and provision of required public facilities and services within Lee County. Regulatory LOS standards will be the basis for determining the adequacy of public facilities for the purposes of permitting new development. Compliance with non-regulatory LOS standards will not be a requirement for continued development permitting but will be used for facility planning purposes. The LOS will be the basis for facility design, for setting impact fees, and (where applicable) for the operation of the Concurrency Management System (CMS).***

- a. Sanitary Sewer – Lee County Utilities serves the area and has capacity. LCU has stated in a letter of availability.
- b. Potable Water – Lee County Utilities serves the area and has capacity. LCU has stated in a letter of availability.
- c. Surface Water/Drainage Basins – The property is intended to be developed as part of and RPD (DCI2023-00049). The project will be required to meet all LDC provisions for surface water management, pre-treatment, storage and treatment including the System Requirement: Prevent the flooding of designated evacuation routes on The Lee Plan Map 15 from the 25-year, 3-day storm event (rainfall) for more than 24 hours.
- d. Parks, Recreation, and Open Space – Lee County Parks and Recreation has provided a letter of service availability.
- e. Public Schools – A letter of capacity has been received from Lee County Schools.

***POLICY 101.1.4: Require that comprehensive plan amendments which increase density within the Coastal High Hazard Area or on islands meet one of the following criteria in accordance with § 163.3178(8), Fla. Stat.:***

1. ***Will not result in an out of County hurricane evacuation time that exceeds 16 hours for a Category 5 storm event (Level E storm surge threat); or***
2. ***Will maintain a 12-hour evacuation time to shelter for a Category 5 storm event (Level E storm surge threat) and ensure shelter space is available to accommodate the additional population; or***
3. ***Will provide appropriate mitigation as determined by Lee County Department of Public Safety, to satisfy both criteria above, which may include the payment of money or construction of hurricane shelters and transportation facilities.***

Please see the report by JR Evans, which is part of the original submittal as "Exhibit M12 - Risk Evac Analysis Comp 01.30.2024", that addresses these criteria and shows that the proposed development meets at least one of the criteria.

***POLICY 101.3.2: Restrict development in the Coastal High Hazard Area to uplands except as needed for the provision of public facilities.***

The site contains 18.17 acres of upland out of 19.33 total acres. The proposed Master Concept Plan (MCP) limits development to the upland acreage. The Acreage that is not considered upland is the area of Phillips Creek that is within the boundary. Development is restricted to within 50-feet of this natural waterway by way of required buffers.

***POLICY 101.3.6: Prohibit the use of Transferable Development Units (TDUs) and bonus density utilizing cash contributions for affordable housing on property located within the Coastal High Hazard Area.***

The proposed development is proposing using up to 145 units of bonus density as permitted by the proposed land use change. According to this policy the request for bonus density includes all units to be site built affordable units at 140% or less of AMI.

***POLICY 101.3.7: Bonus density for site-built affordable housing development will be considered within the Coastal High Hazard Area.***

As mentioned, the request for bonus density includes the limitation for the units to be site built affordable making the request consistent with this policy.

The applicant feels the consideration of bonus density in this area is good planning. The former mobile home flooded 2-3 feet in Hurricane Ian. Since that time the Flournoy Group and the Royal Palm Village POA have successfully terminated the 132 individual lots making way for redevelopment. It is telling that this was able to be accomplished. A CHHA is not an appropriate location for mobile homes, particularly on older parcels that are not raised to current base flood elevations. Repeated flood risks prompted the corporation of the termination.

The site is in the middle of a major employment area, abutted by multifamily developments, acts as an appropriate transition from commercial activity on US 41 to lower densities, has access to two major arterials (with proposed new access to US 41), is within one mile of Lakes Park, has access to Lee Tran with ¼ mile of a bus stop, is serviced by all major urban services as confirmed by the letters of availability for the Lee Plan map amendment letters received. The site is perfect for higher density infill redevelopment, particularly when considering the structures will be built to modern codes and FEMA flood elevations.

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

***POLICY 125.1.3: The design, construction, and maintenance of artificial drainage systems must provide for retention or detention areas and vegetated swale systems that minimize nutrient loading and pollution of freshwater and estuarine systems.***

The permit process will require a water quality management plan addressing the issues in these policies. The draft plan is part of Exhibit M14.

## **IX. CONCLUSION**

The proposed Flournoy Multifamily CPA allows for redevelopment into a well-planned multifamily community which accommodates increasing demand for vertical density and will allow for increase bonus density, which is limited to affordable multi-family housing, to be integrated into the surrounding employment center.

The proposed Flournoy Multifamily RPD also provides significant protection to the surrounding neighborhood to the south through a site plan which internalizes development through sufficient buffers and setbacks, two access points, and restoration supporting amenities on site.

# Royal Palm RPD

Lee County, Florida

## Coastal High Hazard/Hurricane Risk Assessment Report

Prepared By:



9961 Interstate Commerce Drive, Suite 230  
Fort Myers, FL 33914

January 2024

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**Elizabeth A. Fountain, P.E.**  
**Florida Reg. No. 60077**  
**C.A. #29226**



# Section 1

**Royal Palm RPD Property  
Lee County, Florida  
Coastal High Hazard Area (CHHA)/ Hurricane Risk Assessment Report**

This report is prepared and provided to evaluate the Royal Palm RPD property with respect to hurricane risk and the potential impacts to evacuation facilities due to the proposed changes in density per the pending Rezoning application. The property was previously used as a mobile home park, known as the Royal Palm Village mobile home park. The property previously contained approximately 134 mobile home sites and an amenity center. The property experienced impacts from hurricane Ian and the previous uses of the property have been terminated. It is understood that that the property's ownership is currently pursuing a rezoning process for 19.3 acres of the overall property to achieve a zoning of RPD to allow 391 multi-family apartments/units with supporting amenities. The rezoning effort is associated with the redevelopment of the property, in response to recent hurricane Ian and the intent to increase resiliency for the property's new structures.

This report evaluates the specific property conditions with respect to location, flooding and storm surge risks, and potential impact on evacuation activities. This report also provides the distinction between the different uses and designations of "Coastal High Hazard Area (CHHA)" as used by the planning/zoning industry and the FEMA/National Flood Insurance Program and Construction industries. This report has been prepared by the JR Evans Engineering, P.A. Floodplain Management and Stormwater Design Department's director, Mrs. Elizabeth Fountain, P.E., CFM, a licensed Professional Engineer, and a Certified Floodplain Manager. In addition, JR Evans Engineering P.A. has provided an evaluation pertaining to risk and emergency preparedness by Emergency Management Expert, Jim von Rintel, CFM, CEM, FPEM.

**EXECUTIVE SUMMARY**

This Report comprises a comprehensive analysis of the Royal Palm Village RPD property from an Engineering and Emergency Management perspective. The key findings of this analysis are as follows:

- The subject 19.3 acres associated with the proposed rezoning application falls completely outside the Coastal High Hazard Area (CHHA) currently designated by FEMA, in which the FEMA maps have been recently updated and are effective as of November 17, 2022, to reflect more current storm surge affects.
- The entire property is situated in a FEMA Mapped Special Flood Hazard Areas of AE (EL 11). Because this property is in a coastal area near the Gulf of Mexico, it is in a potential evacuation zone, which is typical for developments of this type in coastal Florida.
- The subject property is located within the NOAA/SLOSH-defined Coastal High Hazard AREA (CHHA) as depicted on Map 5-A within the Lee Plan.
- The finished first-floor elevation of any newly constructed building at this location will be required to be a minimum of 1-foot above the FIRM/FEMA Zone Base Flood Elevation (BFE) designation.
- The current building code (FBC ICC 2020) and minimum elevation requirements for this project provide significantly increased elevation requirements and structural reinforcing elements to enhance resilience against the potential impacts of hurricanes and flooding.

- The project's potential additional residents and guests are not expected to significantly contribute to emergency evacuation or sheltering needs in the area.
  - US 41 (Tamiami Trail North), Danials Parkway, Ben C/Six Mile Cypress Parkway, and Alico Road are State designated hurricane evacuation routes.
  - There are numerous public shelters in the vicinity outside potential evacuation areas, all with capacity to house residents.
  - Based on the companion Traffic Impact Study for the rezoning, prepared by TR Transportation Consultants, Inc.; the project's additional units will not have a significant impact on any of the analyzed roadway segments and adopted capacities of roadways located within a 3-mile radius
- FEMA CHHA and storm surge modeling is used for the development of coastal floodplain boundaries, emergency management plans, and implementation of building codes. This model uses historical data and forecasts to model the most likely outcome from any given hurricane event. The result includes the regulatory mapping of the floodplains for the 1% annual-chance-event (100-year) and 0.2% annual-chance-event (500-year) floodplains affecting coastal and inland communities.
- SLOSH CHHA and storm modeling is used to model the worst-case scenario storm under the most perfect conditions. No single hurricane event will produce the regional flooding as depicted using this model.

Provided below are the descriptions and distinctions associated with the term "Coastal High Hazard Area" or CHHA, which is a critical aspect of this potential project when evaluating the risks related to major storm events such as hurricanes and tropical storms.

#### **FEMA CHHA**

The term "Coastal High Hazard Area (CHHA)" as defined by the Federal Emergency Management Agency (FEMA) is as follows:

*An area of special flood hazard extending from offshore to the inland limit of a primary frontal dune along an open coast and any other area subject to high velocity wave action from storms or seismic sources. The coastal high hazard area is identified as Zone V on Flood Insurance Rate Maps (FIRMs). Special floodplain management requirements apply in V Zones including the requirement that all buildings be elevated on piles or columns.*

The Coastal High Hazard Area is meant to represent the area of coastal flooding which is subject to high or moderate velocity wave action during a significant storm event, such as a hurricane event, also referred to as a 1%-annual-chance-event. To determine the location and characteristics of these coastal high hazard areas, computer models are executed to evaluate the effects of storm surge, wave generation and overland flow of the waves. The results of the comprehensive storm surge modeling determine the mapping of the coastal flood zones, with appropriate designations and determined flood elevations. The CHHA areas are depicted on FEMA maps as Zone VE and Coastal A Zone, defined by the Limit of Moderate Wave Action (LiMWA) on the Flood Maps.

#### **SLOSH CHHA**

In regional planning activities and in emergency management planning, the SLOSH (Sea, Lake, Overland Surges from Hurricanes) model data is typically used to evaluate potential maximum surge levels for properties and assist municipalities with evacuation zones and route planning. The results of the SLOSH model are used to define the CHHA areas associated with the evacuation zones. The SLOSH model is a computerized model developed by the National Weather Service

(NWS) to estimate storm surge heights resulting from historical, hypothetical, or predicted hurricanes by considering the atmospheric pressure, size, forward speed, and track data. The SLOSH model does not explicitly model the impacts of waves on top of the surge, nor does it account for normal river flow or rain flooding. The products of the SLOSH model, known as The Maximum of the Maximum Envelope of High Water (MEOW), or MOM, provide a worst-case snapshot for a particular storm category under "perfect" storm conditions. No single hurricane will produce the regional flooding depicted in the MOMs. Instead, the product is intended to capture the worst-case highest-water value at a particular location for the purpose of hurricane evacuation planning.

## Section 2

### **SITE SPECIFIC INFORMATION**

The Royal Palm RPD property is located in Lee County Evacuation Zone A. The subject property is located within the following FEMA defined Special Hazard Area: Zone AE (EL 11). The entire property is located outside the FEMA designated Coastal High Hazard Areas (CHHA) Zone VE and Coastal A Zone (Please see image on following page). Other site-specific characteristics and building requirements will help minimize and mitigate the impacts from a storm event. These include the following:

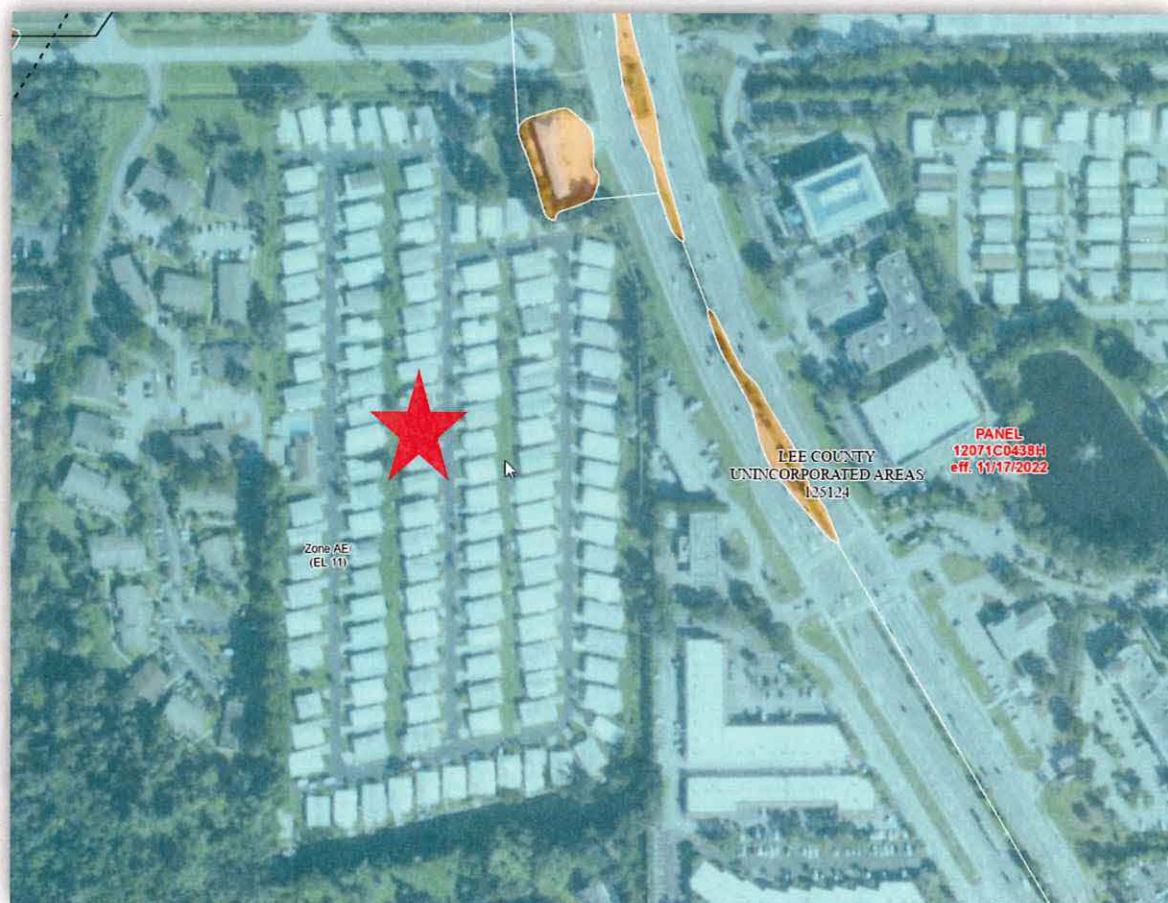
- The subject property is located outside of the FEMA mapped coastal high hazard area flood zone.
- All new structures in Florida must be constructed to meet the current Florida building code, FBC ICC 2020 and ASCE 24-14 for those located within a Special Flood Hazard Area (SFHA). A few key aspects of these regulations include the following:
  - The minimum finished floor elevation (FFE) is required to be constructed at least of 1 foot, or more, above Base Flood Elevation (BFE) to prevent any flooding of the structure and reduce risk of flood damage.
  - New or substantially improved structures are required to meet current FBC and ASCE 24-14 applicable requirements, including with foundation elements, elevation requirements for habitable floors and utility infrastructure, floodproofing measures and limits on enclosures/walls located below Base Flood Elevation.
  - New buildings are required to have increased structural reinforcing elements which greatly improves the resilience of the structure in high-velocity hurricane zones.
- The US 41 (Tamiami Trail North), Daniels Parkway, Ben C/Six Mile Cypress Parkway and Allico Road are State designated hurricane evacuation routes providing immediate and expedited access in the event of an evacuation without increasing out of County drive times.
- Based on the companion Traffic Impact Study for the rezoning, prepared by TR Transportation Consultants, Inc.; the project's additional units will not have a significant impact on any of the analyzed roadway segments and adopted roadway capacities for roadways located within a 3-mile radius. Specifically, on US 41, south of Island Park Rd, the analysis demonstrates that the additional units only impact the segment by less than 0.3% of adopted roadway capacity.
- There are numerous public shelters in the immediate vicinity in Lee County, which have capacity to house additional residents.
- The Royal Palm RPD's Operational Staff will maintain an Emergency Preparedness Plan outlining the protocol and actions required to provide safety, preparedness, response, recovery, and mitigation before, during and after a tropical storm system and other emergencies. The Emergency Preparedness Plan will meet the requirements of Lee County AC 7-7 and be reviewed and updated annually.

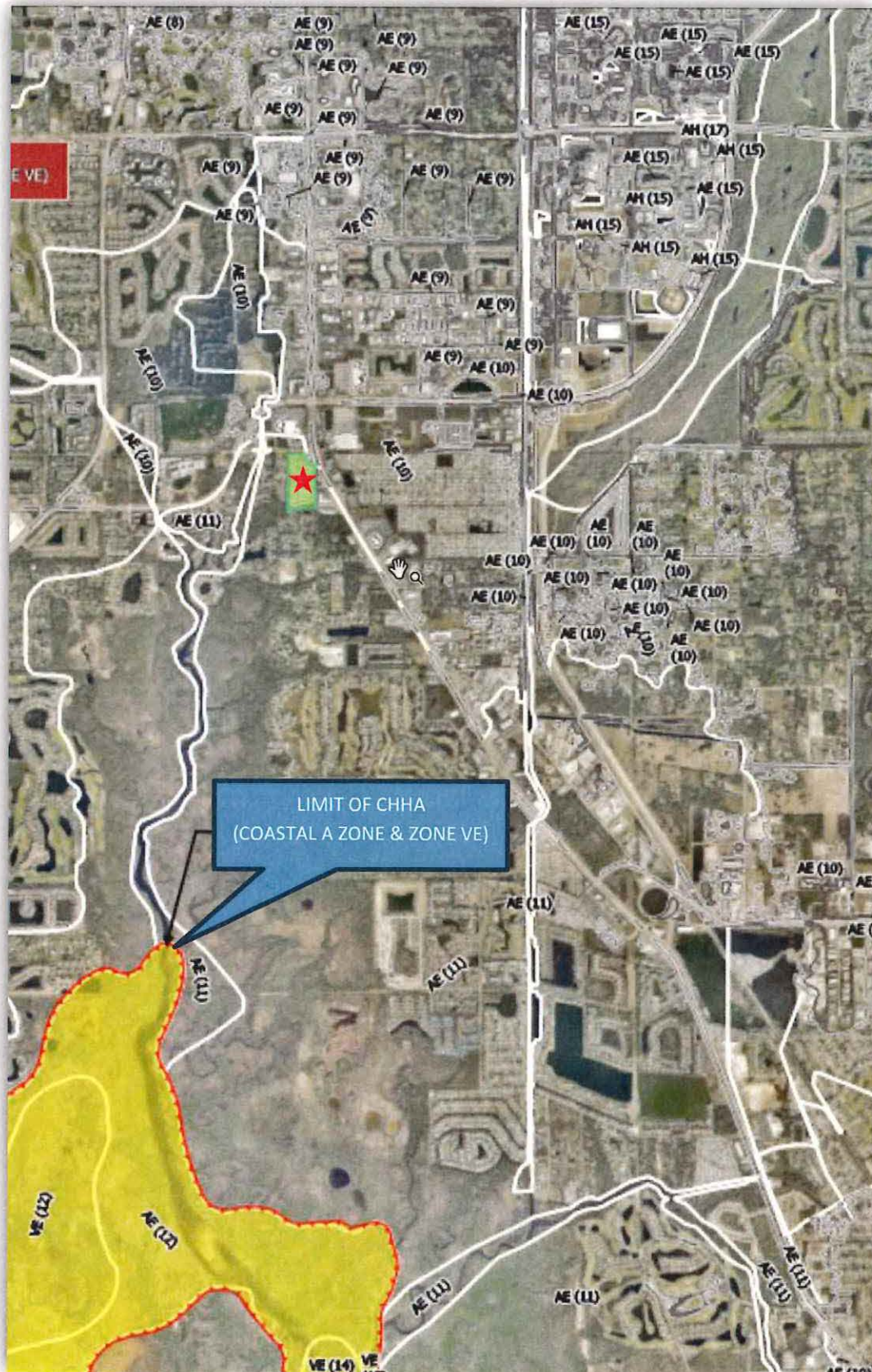
The following figures depict the location of the project site in relation to the FEMA Mapped Flood Hazard Areas and the extent of the CHHA (defined by FEMA):

**FEMA National Flood Hazard Layer Map**



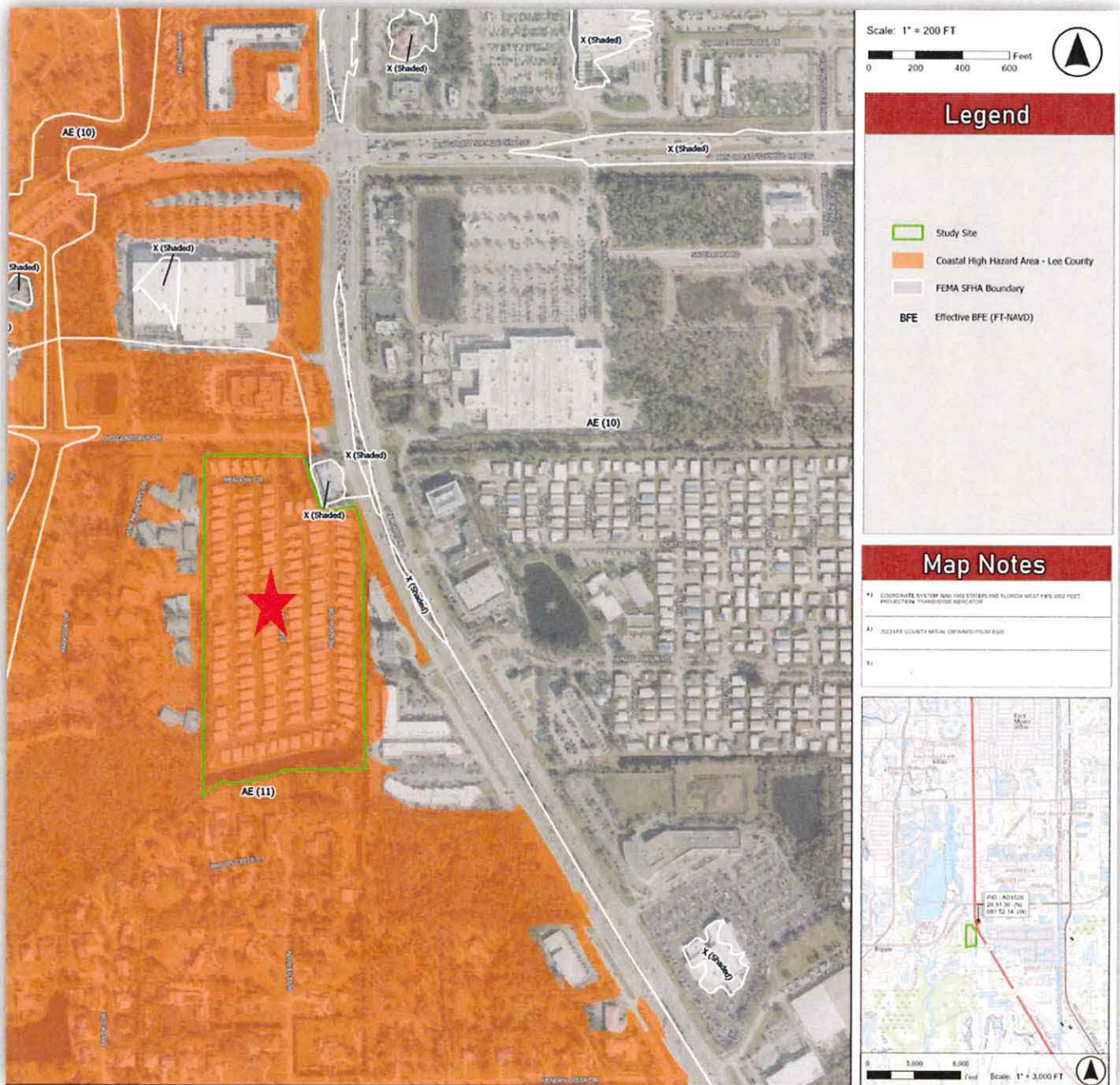
**FEMA National Flood Hazard Layer Map**







The following figure depict the location of the project site in relation to the NOAA Defined CHHA as depicted on Map 5-A of the Lee Plan:



Utilized by FEMA and accepted by municipalities, the term CHHA is defined as very high-risk areas subject to intense coastal flooding and wave action in which special floodplain management requirements are applicable, particularly with respect to construction and building. The other application is associated with the results of the SLOSH (Sea, Lake, Overland Surges from Hurricanes) model developed by the National Weather Services and utilized for emergency management and planning activities.

As previously mentioned, the Coastal High Hazard Area with respect to FEMA, is meant to represent the area of coastal flooding which is subject to high or moderate velocity wave action during a significant storm event, referred to as the 1%-annual-chance-event. The locations of these coastal high hazard areas are based on the results of the comprehensive storm surge modeling and wave propagation modeling. The CHHA areas are depicted on FEMA maps as Zone VE and Coastal A Zone, defined by the Limit of Moderate Wave Action (LiMWA) on the Flood Maps.

FEMA has recently completed a multi-County coastal study, including Lee County and incorporated jurisdictions, which included a substantial update to the region's storm surge modeling with consideration of numerous recent hurricanes and tropical storms that have come close and through the study area. Based on the current Flood Insurance Study (FIS) for Lee County effective November 17, 2022, the updated coastal analysis was based historical records and data from actual storms passing through or nearby the study area with specific characteristics such as strength, size, and track. The historic storm data was used in conjunction with numerical hydrodynamic models to determine storm surge levels. An extreme value analysis was conducted on the storm surge modeling results to determine a stillwater elevation (SWEL) for the 1% annual chance event. In addition to the storm surge modeling, an overland wave hazard analysis was conducted to determine the combined effects of ground, vegetation, and physical features within the study area on wave heights and propagation. The results of these analyses determined the final elevations for the 1% annual-chance flood event associated with the study area which is depicted on the FIRMs for Lee County. This information is utilized for establishing the criteria in design, construction, and floodplain management industries as it represents the most recent and best available data related to storm surge and flood risks.

As mentioned earlier, the SLOSH model is commonly used in regional and emergency management planning to assess potential maximum surge levels for properties. It's a computerized model created by the National Weather Service (NWS) that produces a product called The Maximum of the Maximum Envelope of High Water (MEOW) or MOM, which represents a worst-case scenario for a particular storm category under "perfect" storm conditions. The model creates a wind field that drives the storm surge, but it doesn't account for the impacts of waves on top of the surge or normal river flow or rain flooding. It's important to note that no single hurricane will produce the regional flooding depicted in the MOMs. Rather, the product is designed to capture the worst-case highest-water value at a particular location for the purpose of hurricane evacuation planning.

The FEMA mapping and analyses are used for Florida Building Code (FBC) regulations and local development codes. In our professional opinion, the analyses prepared through the FEMA program and subsequent studies provide the best evaluation for the extent of coastal flooding and impacts to coastal communities within southwest Florida.

## Section 3

### **RISK AND EMERGENCY PREPAREDNESS**

This evaluation represents a thorough hurricane risk analysis of the Royal Palm property located just West of US 41 (Tamiami Trail North, Lee County, Florida). The highlights of this analysis are as follows:

#### Vulnerability:

- This property is located in unincorporated Lee County, Florida.
- The property is located outside of the Coastal High Hazard Area (CHHA), as defined by FEMA.
- The property is located in an AE-11 FEMA Flood Zone.
- It is in a designated Lee County Evacuation Zone A.
- During some tropical storms and hurricane threats this area is subject to mandatory evacuations.
- This is not an unusual property parcel for development of this type in coastal Florida.
- The current building and elevation requirements that would be used to construct this project provide substantially superior resiliency to the effects of tropical storms, hurricanes and flooding compared to older construction.
- The potential residents and guests would not substantially add to the emergency evacuation route times or sheltering requirements for this area.
- The previous use of the property as a mobile-home community typically results in a higher rate of evacuation participation and sheltering needs.
- The property's ownership and operation entity will maintain an Emergency Preparedness Plan which meets the requirements of Lee County AC 7-7.
- There are numerous hurricane shelters within a 25-mile radius of this project. Please reference Figure below .
- Residents who were to evacuate outside this area would not substantially add to the traffic on the current established evacuation routes.

#### New Code Construction:

All new structures in Florida must be constructed to meet the current Florida building code, FBC ICC 2020 and ASCE 24-14 (Flood Resistant Design and Construction) for those structures located in Special Flood Hazard Areas. Florida Building Code requires structures to have increased structural reinforcing elements, elevated elevations, and many other requirements which greatly improve a structures resilience in high-velocity hurricane zones and flood prone areas.

#### Location:

The project is located just West of US 41 (Tamiami Trail North). The property is located along the Gulf of Mexico and borders the coastal high-risk flood zone. The property location is in Zone AE-11, and is outside of the coastal high hazard area, according to the FEMA mapped Special Flood Hazard Areas. It is in an "A" evacuation zone, which could be subject to mandatory evacuations during hurricanes (and potentially some tropical storms).

#### Evacuation:

The project site is in Lee County evacuation zone "A", not unlike a large number of dwellings and structures in Florida. Evacuation zone A could be subject to mandatory evacuations in all categories of hurricanes and potentially some tropical storms. The US 41 (Tamiami Trail North), Daniels Parkway, Ben C/Six Mile Cypress Parkway, and Alico Road and are State designated hurricane evacuation routes providing immediate and expedited access in the event of an evacuation without increasing out of

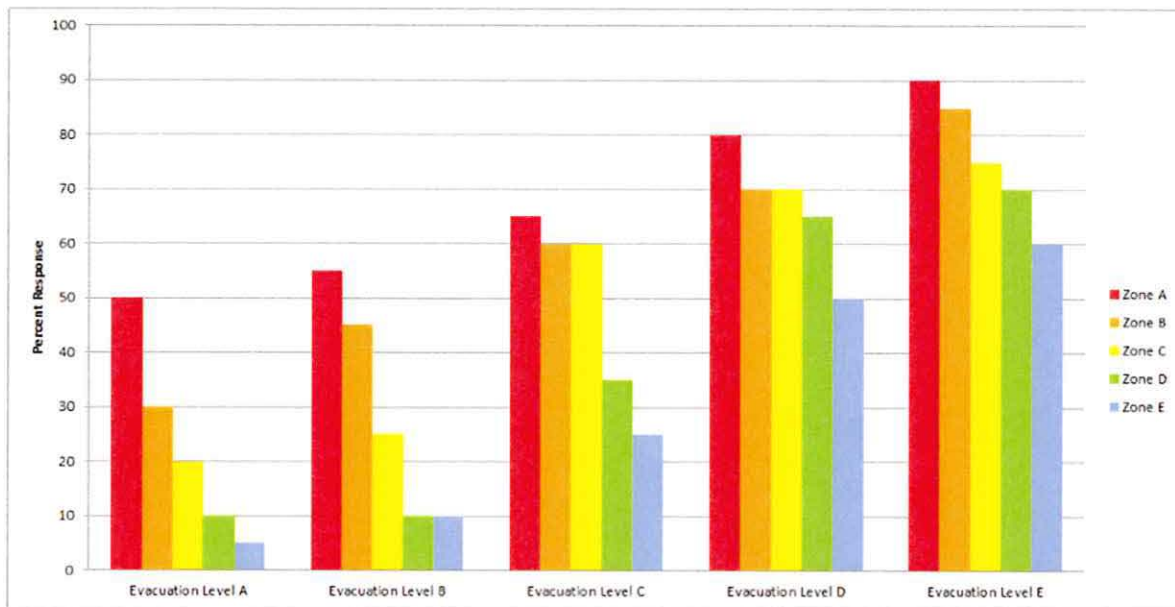
county drive times. If evacuating to a shelter, there are thirty-four (34) public shelters in Lee County outside any evacuation zone, which have capacity to house additional residents.

For evacuation efforts, Lee County utilizes a phased approach when orders to evacuate are issued. When orders to evacuate are issued Zone A, Mobile/Manufacture Homes, and Special Needs Registrants are the first to evacuate, and because of the phased process, may be evacuating while the weather is non-threatening. This approach allows the County time to receive better information from the National Hurricane Center, and determine which other Zones need to evacuate. It also helps reduce the number of evacuees on the roadways at the same time, providing more time for movement of people.

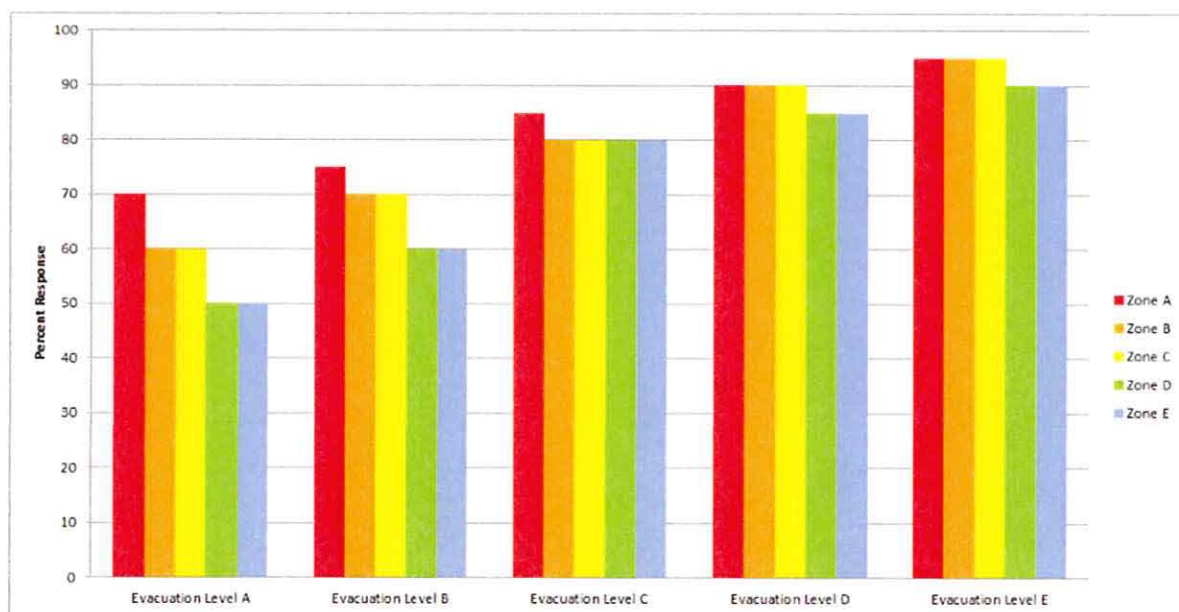
When evacuating for hurricanes, the time needed to evacuate is determined from studies conducted by the Florida Division of Emergency Management and Regional Planning Councils, with the assistance of Local Emergency Management agencies. These studies provide both a Base Evacuation Time for each Evacuation Zone, and an Operational Evacuation Time. The Base Evacuation Time is the worst-case scenario with 100% of the people in each zone evacuating at the same time. The Operational Evacuation Time is based on information from the Regional Planning Councils and Local Emergency Management agencies that is specific to their Region, and County. It accounts for the behavior of residents, traffic patterns, roadway construction, etc. Based on the current regional evacuation study by the Florida Department of Emergency Management and Regional Planning Councils, the evacuation time for Lee County's Surge Evacuation Zone A is 10 to 10.5 hours at the time of the order of evacuation.

Evacuation participation is based on several factors including behavioral responses. For example, based on the most recent (2017) Southwest Regional Planning Council's evacuation transportation model analysis, which includes behavioral assumptions for evacuation responses, the projected evacuation participation rates for Lee County Site-Built Homes in Zone A for an Evacuation Level A are at 50% and up to 90% for an Evacuation Level E. In comparison, the evacuation participation rates for residences in mobile home sites in Zone A is greater, being at 70% for an Evacuation Level A up to 95% for an Evacuation Level E. In another study conducted for Northeast Florida Regional Planning Council in 2021 entitled "Florida Statewide Regional Evacuation Study Program", the evacuation rate for Lee County during Hurricane Irma (2018) was 49%. Provided below are figures from the respective study reports illustrating the evacuation rates.

**Figure III-12: Evacuation Participation Rates: Lee County Site-Built Homes**



**Figure III-13: Evacuation Participation Rates: Lee County Mobile Homes**



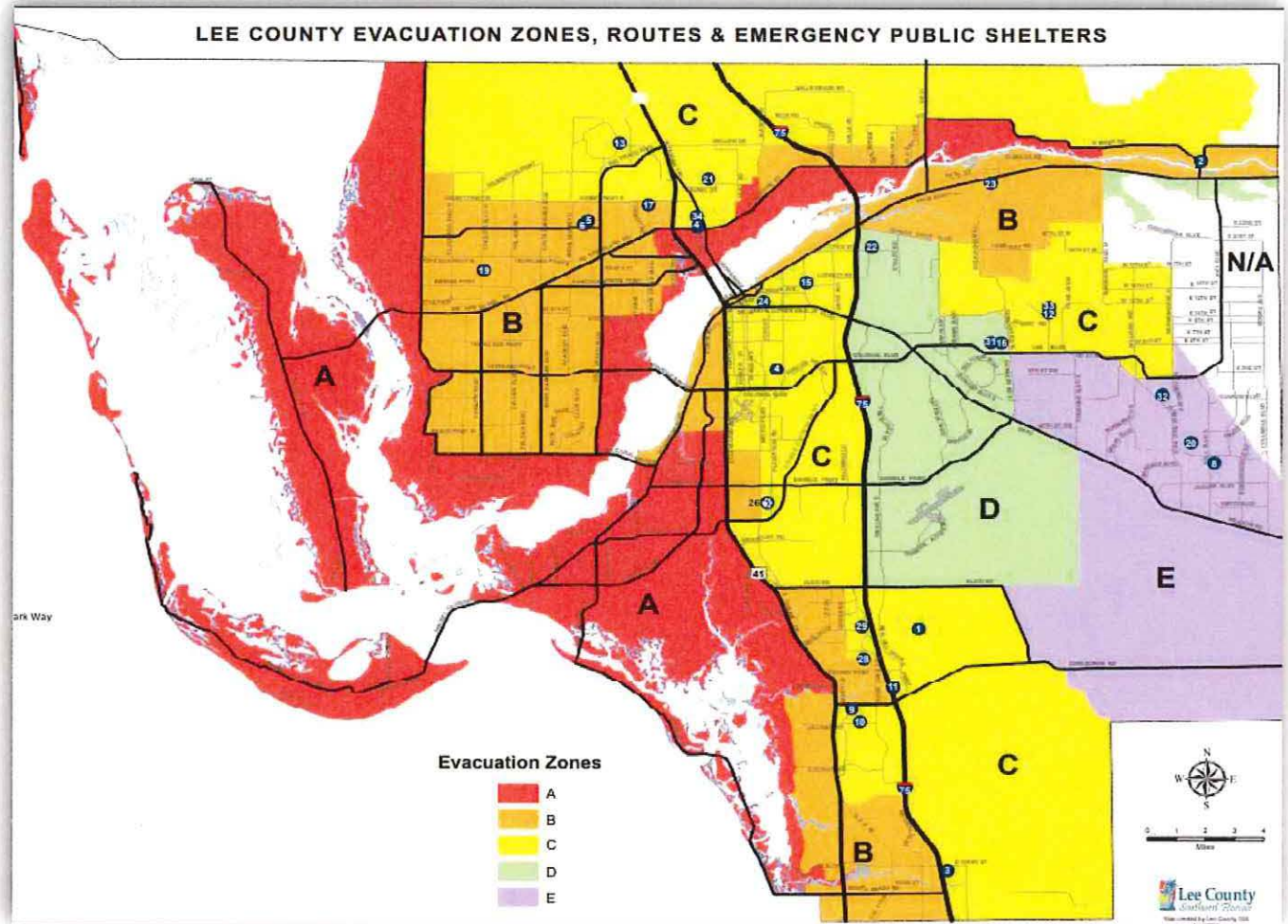
*Florida Statewide Regional Evacuation Study Program*

**Table 3.7 Evacuation Comparisons by County**

Hurricane Event	County	Percent Evacuated (Survey)	Percent Evacuated (LBS Data)	Difference
Irma	Bay	10%	24%	14%
Irma	Brevard	25%	29%	4%
Irma	Broward	21%	27%	6%
Irma	Charlotte	45%	46%	2%
Irma	Citrus	21%	28%	7%
Irma	Collier	41%	50%	9%
Irma	Duval	19%	24%	5%
Irma	Escambia	5%	23%	17%
Irma	Flagler	27%	23%	-4%
Irma	Franklin	30%	38%	8%
Irma	Gulf	74%	33%	-41%
Irma	Hernando	27%	25%	-2%
Irma	Hillsborough	30%	34%	3%
Irma	Indian River	19%	32%	13%
Irma	Lee	49%	45%	-4%
Irma	Levy	75%	36%	-39%
Irma	Manatee	29%	39%	10%

This project, as proposed with the potential for additional units, should not have a significant impact on the safe evacuation of this area or Lee County in general.

Provided below is an image of Lee Evacuation Routes and Shelter Locations:



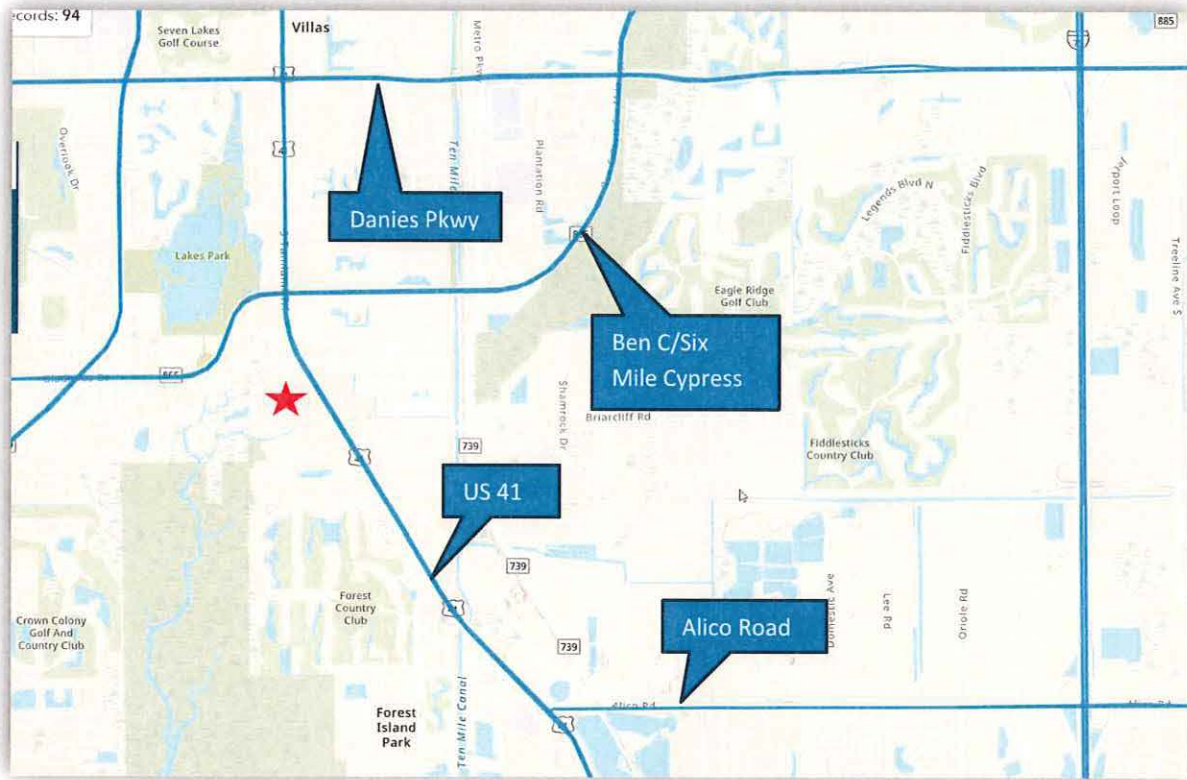


Provided below is an image of State-Approved Evacuation Routes in proximity to the project location:

**Evacuation Route**



Lee County Florida GIS  
Lee County Florida GIS



## Section 4

## PRELIMINARY ANALYSIS OF POTENTIAL SHELTER/EVACUATION MITIGATION

It is understood that as part of the Development Order permitting process with Lee County and in accordance with Lee Plan Policy 101.1.4, the Division Director will make the final decision with respect to the determination of hurricane shelter and evacuation impacts and the acceptability of the type and degree of mitigation offered to address the proposed development. Provided below is a preliminary analysis of the potential mitigation costs for addressing the proposed development's impact on shelter spaces and evacuation facilities. The analysis is based on the proposed rezoning request parameters, Lee County Land Development Code, Section 2-484, and the assumption that 100% of the additional units would be occupied and contribute to the evacuation process from the property.

The analysis below is intended to evaluate the potential additional impact between the existing uses on the property and proposed uses. This analysis is based on the difference in residential units between the previous 134 mobile-home units and the proposed 391 apartment units with this rezoning request.

### Shelter Mitigation Analysis

Determine Shelter Spaces Required:

**Net additional residential units = 391 (Proposed) – 134 (Existing/Previous) = 257 Units**

- **Apartment Units**

$$U \times P = N$$

$$257 \text{ Units} \times 2 = 514 \text{ (Total Residents by Apartment Units)}$$

$$N \times Ssr = Sp(r)$$

$$514 \times 0.21 = 107.94 \text{ (Shelter Spaces Needed by Apartment Units)}$$

- **Totals for all Residential Units**

$$Sp(r) + Sp(hu) = Sp \times Rfa = Sq(t)$$

$$\text{Total Units } 107.94 \times 20 = 2,158.8 \text{ Square Feet}$$

Notes:

O = Number of people per unit

R = Residents in residence

N = Number of residents in development

U = Number of residential units

Hu = Number of hotel/motel units

P = Persons per household\*

Rfa = Required square feet of shelter floor area per space (currently 20 square feet per space)

Sp(r) = Shelter spaces needed by development's residential units

Sp(hu) = Shelter spaces needed by development's hotel/motel units

Ssr = Shelter seeking rate (currently 0.21 is used)

Sq(t) = total square feet of shelter floor area required for the development

**Mitigation Payment Analysis (in lieu of donation of land or use of a private structure):**

▪ **Costs of Shelter Improvements**

Total Required Square Feet = 2,158.8 Sq(t)

Shelter Improvement Costs= 2,158.8 x \$6.66 per Sq(t)

**Subtotal= \$14,377.61**

Emergency Power Costs = Total Shelter Spaces X \$20

**Subtotal = 107.94 x \$20 = \$2,158.80**

**Total Costs of Shelter Improvements -= \$16,536.41 ~ Total Shelter and Evacuation Impact Fee**

**Evacuation Facilities Mitigation Analysis**

- Calculate Number of Evacuating Vehicles for all Residential Units:

$U + V = Ev(r)$

$U = 257$

$V =$  Number of vehicles per occupied unit; Current = 1.1

$257$  (Total Evacuating Vehicles) x 1.1 = **282.7= 283 Evacuation Vehicles**

## **DEFINITIONS**

**Costal High Hazard:** *An area of special flood hazard extending from offshore to the inland limit of a primary frontal dune along an open coast and any other area subject to high velocity wave action from storms or seismic sources. The coastal high hazard area is identified as Zone V on Flood Insurance Rate Maps (FIRMs). Special floodplain management requirements apply in V Zones including the requirement that all buildings be elevated on piles or columns.*

**Coastal Zone A:** *Area landward of a V Zone, or landward of an open coast without mapped V Zones. In a Coastal A Zone, the principal source of flooding will be astronomical tides, storm surges, seiches or tsunamis, not riverine flooding. During base flood conditions, the potential for breaking wave heights between 1.5 feet and 3.0 feet will exist.*

**Evacuation Zone:** *These are areas that officials may order evacuated during a hurricane. These zones are mapped by the National Hurricane Center and indicate areas that could be affected by storm surge, storm-driven waves that can inundate a community. Zones in costal Lee County are identified from A-E with inland portions of the County not being included in any evacuation zone.*

**Limit of Moderate Wave Action (LiMWA):** *Flood maps in coastal areas may include a line called the Limit of Moderate Wave Action (LiMWA). The LiMWA marks the inland limit of the Coastal A Zone— the part of the coastal SFHA referenced by building codes and standards where wave heights can be between 1.5 and 3 feet during a base flood event. Past events have shown that waves as small as 1.5 feet can cause foundation failure and structural damage to buildings.*

**Maximum Envelope of High Water (MEOW):** *Provides a worst-case basin snapshot for a particular storm category, forward trajectory, and initial tide level, incorporating uncertainty in forecast landfall location. MEOWs are not storm specific and available to view in the SLOSH display program for all operational basins. No single hurricane will produce the regional flooding depicted in the MEOWs. Instead, the product is intended to capture the worst-case, high-water value at a particular location for hurricane evacuation planning.*

**SLOSH:** *(Sea, Lake, Overland Surges from Hurricanes) model developed by the National Weather Services and utilized for emergency management and planning activities. The SLOSH model is a computerized model developed by the National Weather Service (NWS) to estimate storm surge heights resulting from historical, hypothetical, or predicted hurricanes by considering the atmospheric pressure, size, forward speed, and track data.*

**Special Hazard Area (SFHA):** *An area having special flood, mudflow or flood-related erosion hazards and shown on a Flood Hazard Boundary Map (FHBM) or a Flood Insurance Rate Map (FIRM) Zone A, AO, A1-A30, AE, A99, AH, AR, AR/A, AR/AE, AR/AH, AR/AO, AR/A1-A30, V1-V30, VE or V. The SFHA is the area where the National Flood Insurance Program's (NFIP's) floodplain management regulations must be enforced and the area where the mandatory purchase of flood insurance applies.*

**Stillwater Elevation:** *Stillwater (SWL) means the flood level not including the effects of waves (wave amplitude and wave setup; setup is addressed in a separate Focused Study Group report) or tsunamis and including storm surge and astronomic tide. The SWL is a coastal water surface resulting from astronomical tides, storm surge, and, depending on the location, other effects such as El Niño effects or seiching. The SWL does not include wave heights and runoff. The stillwater elevation (SWEL) is the statistical elevation of the SWL relative to a specified datum*

**Zone AE:** Flood hazard areas identified on the Flood Insurance Rate Map are identified as a Special Flood Hazard Area (SFHA). SFHA are defined as the area that will be inundated by the flood event having a 1-percent chance of being equaled or exceeded in any given year. The 1-percent annual chance flood is also referred to as the base flood or 100-year flood. The base floodplain where base flood elevations are provided. AE Zones are now used on new format FIRMs instead of A1-A30 Zones.

**Zone VE:** Areas along coasts subject to inundation by the 1-percent-annual-chance flood event with additional hazards due to storm-induced velocity wave action. BFEs derived from detailed hydraulic coastal analyses are shown within these zones. (Zone VE is used on new and revised maps in place of Zones V1–V30.) These areas have a 26% chance of flooding over the life of a 30-year mortgage. Base flood elevations derived from detailed analyses are shown at selected intervals within these zones

## Section 5



# Royal Palm Multifamily CPA

## Exhibit M14 - Public Facilities Impacts Analysis

### I. REQUEST

The contract purchaser for the 19.33+/- acre subject property, Flournoy Development Group (“Applicant”), is requesting a Comprehensive Plan Amendment for one change to Lee County’s Comprehensive Plan:

1. Amend Map 1-A – Future Land Use – from Central Urban to the Intensive Development Future Land Use Category (FLUC).

Additionally, there is a companion zoning action (DCI2023-00049) to rezone the property from MHC-2 to Residential Planned Development (RPD) and a Bonus Density application. The development program is for 391 multifamily apartments where 255 units are derived from base density and 136 from bonus density. The property is within the Coastal High Hazard Area which restricts the option of using bonus; therefore, the requested use of the bonus density will be for site-built affordable housing at 140% AMI.

#### Comprehensive Plan Amendment (Maps)

The impacts of the requested amendments are compared to the existing by-right entitlements per the future land use designations. The density permitted for the development area is consistent between the current and proposed land use category at up to 22 units per acre.

The uses between the two land use categories both allow for intense uses. The Central Urban FLUC encourages uses that can best be characterized as the “urban core” of the County. These areas are already the most heavily settled and have, or will have, the greatest range and highest levels of public services. Residential, commercial, public and quasi-public, and limited light industrial land uses will continue to predominate in the Central Urban future land use category. The Intensive Development FLUC is also to be located along major arterial roads and similarly the available and potential levels of public services in both these areas are suited to accommodate high densities and intensities. However, in the Intensive Development category mixed use developments of high-density residential, commercial, limited light industrial, and office uses are encouraged.

CURRENT FUTURE LAND USE	Acreage	Density	Residential Units
Central Urban	19.33 less 1.16 natural waterways = 18.17+/- developable	10 du/acre (base) 4du/acre (bonus)	182 (base) 91 (bonus) <b>= 273 du</b>
PROPOSED FUTURE LAND USE	Acreage	Density	Residential Units
Intensive Development	19.33 less 1.16 natural waterways = 18.17+/- developable	14 du/acre (base) 8 du/acre (bonus)	255 (base) 145 (bonus) <b>= 400 du</b>



### **Potable Water**

The entirety of the subject property is in the Lee County Utilities Future Water Service Area which is demonstrated in Lee Plan Map 4-A. The requested residential density is currently permissible within the existing General Interchange FLUC. The request for utility availability assumed full development of the residential.

Per Lee Plan Policy 95.1.3, an average treatment and disposal capacity of 250 gallons per day per Equivalent Residential Connection (ERC) is required. The 2022 Lee County Concurrency Report indicates that Potable Water is available at a capacity of 319 gallons per day per ERC which exceeds the required LOS. Per Lee County Utilities, sewer capacity is available at the prescribed LOS rate.

A Letter of Availability has been obtained from Lee County Utilities confirming the property will be served by the Corkscrew Water Treatment Plant and capacity is available for the residential density proposed for the subject property which is as follows:

#### **RESIDENTIAL**

Existing Maximum Residential per General Interchange FLUC

391 ERC X 250 GPD = 97,750 GPD

Proposed Impact of Residential within Intensive Development

391 ERC X 250 GPD = 97,750 GPD

### **Sanitary Sewer**

The subject property is within the Lee County Utilities Future Sewer Service Area which is demonstrated in Lee Plan Map 4-B.

Per Lee Plan Policy 95.1.3, an average treatment and disposal capacity of 200 gallons per day per Equivalent Residential Connection (ERC) is required. The 2023 Lee County Concurrency Report indicates that Sanitary Sewer is available at a capacity of 141 gallons per day per ERC; which exceeds the required LOS. A Letter of Availability is pending from Lee County Utilities confirming the property will be served by the Gateway Water Treatment Plant and capacity is available for the residential density proposed for the subject property.

#### **RESIDENTIAL**

Existing Maximum Residential per General Interchange FLUC

391 ERC X 200 GPD = 78,200 GPD

Proposed Impact of Residential within Intensive Development and the Mixed-use Overlay

391 ERC X 200 GPD = 78,200 GPD

### **Solid Waste**

Per the letter received from Lee County Solid Waste on November 15, 2023, The Lee County Solid Waste Department is capable of providing solid waste collection service for the proposed 391 multi family dwelling units located on the southwest corner of Old Gladius Road and US Highway 41 through our franchised hauling contractors. Disposal of the solid waste from this development will be accomplished at the Lee County Resource Recovery Facility and the Lee-Hendry Regional Landfill. Plans have been made, allowing for growth, to maintain long-term disposal capacity at these facilities.

- LOS Standard = 7 lbs/day/capita OR 990,405 tons/year
- Current Capacity = 7.6 lbs/day/capita OR 1,134,667 tons/year

### **Parks, Recreation, and Open Space**

The non-regulatory standards described in Policy 95.1.3(6)(a & b) require six (6) acres of developed regional park land open for public use per 1,000 total seasonal county population for all of Lee County and 0.8 acres of developed community park land open for public use per 1,000 unincorporated Lee County permanent population.

According to the Letter of Service availability received on November 15, 2023, in April 2014, the Lee County Board of County Commissioners adopted a comprehensive plan amendment eliminating concurrency requirements for transportation and parks and moved both from regulatory to non-regulatory standards. Considering this, we do not have the authority to deny your request based on parks service availability.

The below numbers represent the current required and available acreages for regional and community park land as set forth by the requirements of Policy 95.1.3 in the Lee Plan. The Department's available capacity meets the current adopted level-of-service standard and is projected to meet the adopted level-of-service standard for at least the next five years.

- Required Capacity – 5,538 acres of regional parks and 295 acres of community parks
- Available Capacity – 7,066 acres of regional parks and 832 acres of community parks

#### Regional Parks Level of Service:

867,000 [seasonal county population] X (6 acres/1,000 population) = 5,202 acres

The 2022 Lee County Concurrency Report indicates that there is a total required 5,202 acres of regional parks and that the available capacity lists 7,051 acres of regional parks therefore there is available capacity to meet the adopted LOS standard.

Additionally, the 2022 Concurrency Report states that the existing inventory meets the regional park level-of-service standard in the County for the year 2019 and will continue to do so at least through the next five years of the capital improvement plan (CIP).

#### Community Parks Level of Service

361,315 [permanent unincorporated county population] X (0.8 acres/1,000 population) = 295 Acres

The 2020 Lee County Concurrency Report indicates that there is a total required 295 acres of community parks and that the available capacity lists 832 acres of community parks therefore there is available capacity to meet the adopted LOS standard.

Additionally, the 2020 Concurrency Report states that the existing inventory meets the regional park level-of-service standard in the County for the year 2019 and will continue to do so at least through the next five years of the capital improvement plan (CIP).

### **Public Schools**

The subject property is located within the School District of Lee County's South Zone. The letter of capacity from the district has been received on November 16, 2023 and states, "The Concurrency Analysis attached, displays the impact of this development. Capacity is an issue within the Concurrency Service Area (CSA) at the elementary school level, however, capacity is available in the adjacent CSA."

**Fire**

A letter of Availability received from the South Trail Fire Control and Rescue District Station #62, located at 13500 Sophomore Lane, confirms that the station is available to provide fire suppression and non-transport ALS emergency medical services to the parcels in the development given the proposed density and intensity.

**Sheriff**

A letter of Availability dated November 16, 2023, states, "This Agency evaluated your rezoning request solely on its ability to provide law enforcement service to the development. Based on that criterion, we do not object to the proposed development. Law enforcement services will be provided from our Central District offices in Fort Myers. As this development builds out, we will factor its impact into our annual manpower review and make adjustments accordingly. At the time of application for new development orders or building permits, the applicant shall provide a Crime Prevention Through Environmental Design (CPTED) report done by the applicant and given to the Lee County Sheriff's Office for review and comments. Please contact Crime Prevention Practitioner Tiffany Wood at (239) 477-1885 with any questions regarding the CPTED study."

**EMS**

A letter of Availability dated November 16, 2023, states, "Lee County Emergency Medical Services is the primary EMS transport agency responsible for coverage at the location you have provided. There is one ambulance located 1.6 miles east. A second location is 2.3 miles west.

It is our opinion that the EMS service availability for the proposed development of this property is adequate at this time. Should the plans change, a new analysis of this impact would be required."

**Surface Water/Drainage Basins**

The non-regulatory standards described in Policy 95.1.3(4)(c) require new development to be designed to South Florida Water Management District (SFWMD) standards to detain or retain excess stormwater to match the predevelopment discharge rate for the 25-year, 3-day storm event. Additionally, it requires that the stormwater system must prevent the flooding of designated evacuation routes on the Lee Plan Map 15 from the 25-year, 3-day storm event for more than 24 hours. The proposed map amendment and concurrent residential planned development will be consistent with the requirements of Lee Plan Policy 95.1.3 (including Map 3-J) as an ERP permit is required to be obtained for the proposed development prior to construction commencement.

On the next page is a proposed surface water management plan:



2726 OAK RIDGE COURT, SUITE 503  
FORT MYERS, FL 33901-9356  
OFFICE 239.278.3090  
FAX 239.278.1906

TRAFFIC ENGINEERING  
TRANSPORTATION PLANNING  
SIGNAL SYSTEMS/DESIGN

January 31, 2024

Mr. Fred Drovdlc  
RVi Planning + Landscape Architecture  
1514 Broadway Avenue  
Fort Myers, FL 33901

RE: Royal Palm Multi-Family  
DCI2023-00049 & CPA2023-00011

Dear Mr. Drovdlc:

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

**Rezoning Analysis DCI2023-00049**

*Table 6A needs revision. The Peak Hour Peak Season Peak Direction Traffic Count for US 41 (S. of Six Mile and S. of Island Park Rd.) is not consistent with the 2022 Lee County Public Facilities Level of Services and Concurrency Report.*

**Table 6A** was revised to reflect the correct value for this segment of U.S. 41 south of Six Mile Cypress Parkway. The revised table and a revised Figure 3 illustrating the Level of Service analysis is attached to this response. U.S. 41 remains at a LOS "F" south of Six Mile Cypress Parkway in 2028 both with and without the project.

*As the project generates between 100 and 300 peak-hour trips, information regarding the level of Service of all the site accesses and all intersections within one-quarter of a mile area must be provided.*

Attached to this response is a drawing indicating the intersections that are within ¼ mile of the site access drive on Old Gladiolus Drive. The only intersections are along U.S. 41 and include the site access drive and the two signalized intersections of Six Mile Cypress Parkway and Jamacia Bay Boulevard. The project is not projected to add any turning movements to the intersection of Jamacia Bay Boulevard so an analysis of this intersection would not provide any useful information as the only movements impacted would be the northbound and southbound through movements along U.S. 41. The project would only be adding approximately thirty (30) trips to the through movement at the Jamica Bay Boulevard intersection at U.S. 41. U.S. 41 currently carries approximately 2,500 cars in the peak direction during the peak hour on a typical weekday (4,800 vehicles in both directions). Therefore, the project would only be impacting the peak

directional volume by just over 1% of the total peak hour volume on U.S. 41, which is an insignificant increase.

Likewise, the project will have an insignificant impact to the intersection of U.S. 41 at the Six Mile Cypress Parkway intersection, one of the busiest intersections during the peak hours in Lee County. This project is anticipated to add approximately 96 vehicles in the peak hour to this intersection (see attached Figure 2). During a typical weekday peak hour, this intersection will accommodate over 7,500 vehicles. Therefore, this project will only impact this intersection by less than 1.3%. Evaluation of this signalized intersection will not provide any appreciable information. This intersection is already functioning over capacity and has been studied by FDOT an Lee County for future improvements, including a grade-separation.

An analysis of the site access drive intersection with U.S. 41 is attached to this response for information. It should be noted that the applicant is in the permitting process with the Florida Department of Transportation for the access drive connection to U.S. 41 and they did not request any intersection analysis along U.S. 41 to the north and south of this access drive connection.

#### **Comprehensive Plan Amendment TIS Comments (CPA2023-00011)**

*Tables 1A and 3A require revision, as the LOS standard for Winkler Rd. (North of College Pkwy) appears inaccurate. Additionally, kindly make any necessary updates in the Transportation Impact Study (TIS) to reflect this change.*

These tables were revised to reflect the correct 2-lane service volume for this segment of Winkler Road. It did not change the analysis results for either the Short Term analysis or the 2045 analysis. Both the Short Term analysis and 2045 analysis spreadsheets are also attached to this response for reference.

*Table 2A also requires revision, specifically concerning the accuracy of the K-factor and D-factor for most segments. Please refer to the Lee County Traffic Count Report and the Florida Traffic Online Webpage for accurate information. Furthermore, the estimation of Peak Hour Peak Directional Project Traffic should be based on the peak directional count (133) generated from the development.*

The data in Table 2A for Gladiolus Drive was changed based on K-100 and D-factor data from the Lee County Permanent County Station #46 (Gladiolus Drive W. of US 41). Six Mile Cypress Parkway was changed based on the K-100 and D-factor data from Lee County Permanent County Station #18 (Six Mile Cypress Parkway north of Winkler Road). Winkler Road was changed based on the K-100 and D-factor data from Lee County Permanent County Station #37 (McGregor Boulevard south of Pine Ridge Road) based on PCS references from previous Lee County Traffic Count reports for Winkler

Road. The analysis was also changed to reflect the impacts based on the peak directional count being generated from the project (133 trips). None of these changes impacted the Level of Service on the roadway segments as previously reported.

A copy of the revised **Table 2A** is attached to this response for reference. Copies of the PCS data from the referenced Lee County PCS stations are also attached illustrating the K-100 and D-factors.

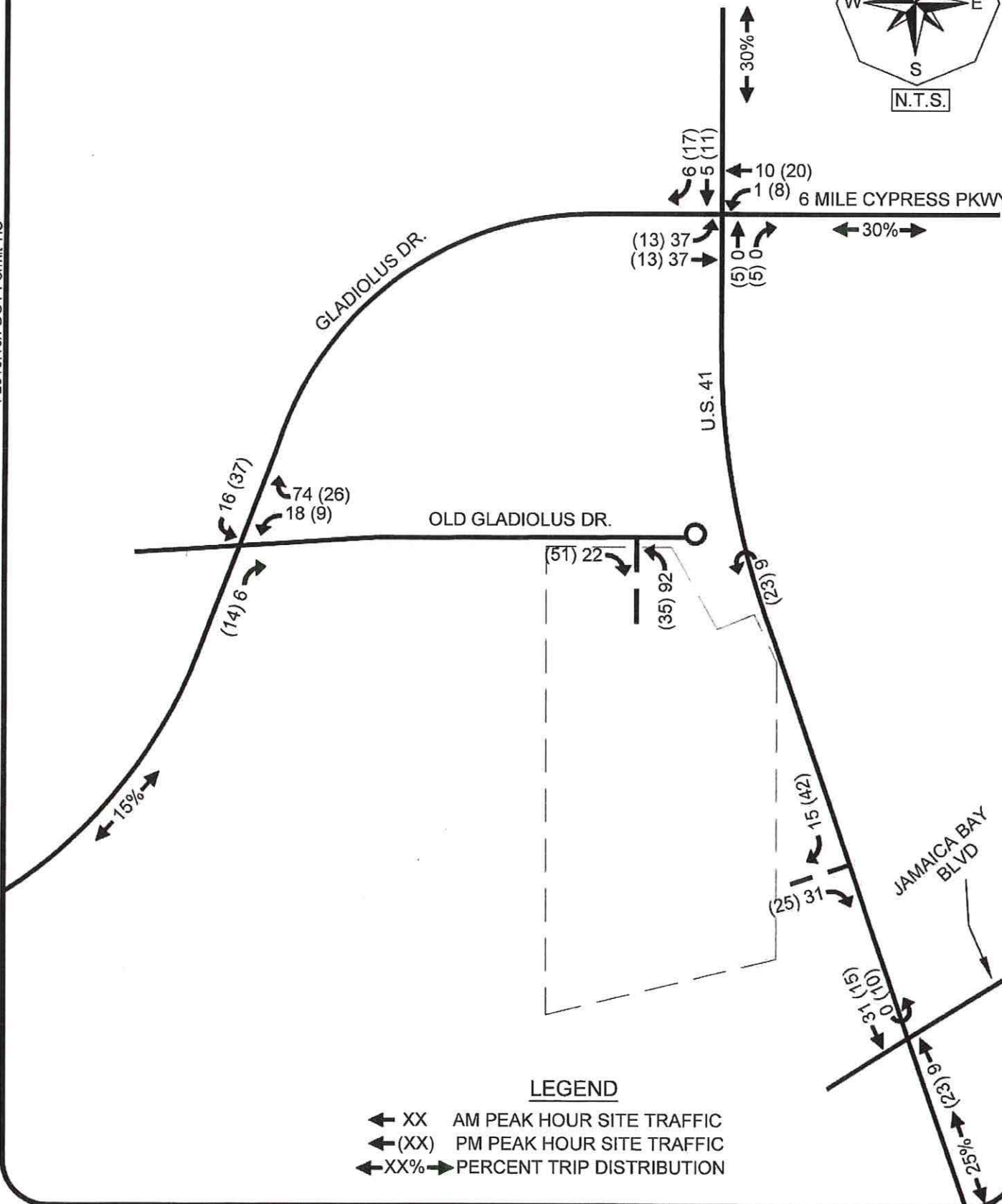
If you have any additional questions, please do not hesitate to contact us.

Sincerely,



Ted B. Treesh, PTP  
President

Attachments





2,882 - "C"  
(2,919 - "C")

N.T.S.

SIX MILE CYPRESS PKWY

GLADIOLUS DR.

2,558 - "C"  
(2,583 - "C")

3,448 - "F"  
(3,486 - "F")

OLD GLADIOLUS DR.

U.S. 41

**LEGEND**

XXX - "X" 2028 PEAK SEASON PEAK HOUR  
PEAK DIRECTION BACKGROUND  
TRAFFIC AND LEVEL OF SERVICE  
DESIGNATION

(XXX -"X") 2028 PEAK SEASON PEAK HOUR  
PEAK DIRECTION BACKGROUND  
TRAFFIC PLUS PEAK PROJECT  
TRIPS AND LEVEL OF SERVICE  
DESIGNATION

**2028 LEVEL OF SERVICE ANALYSIS**

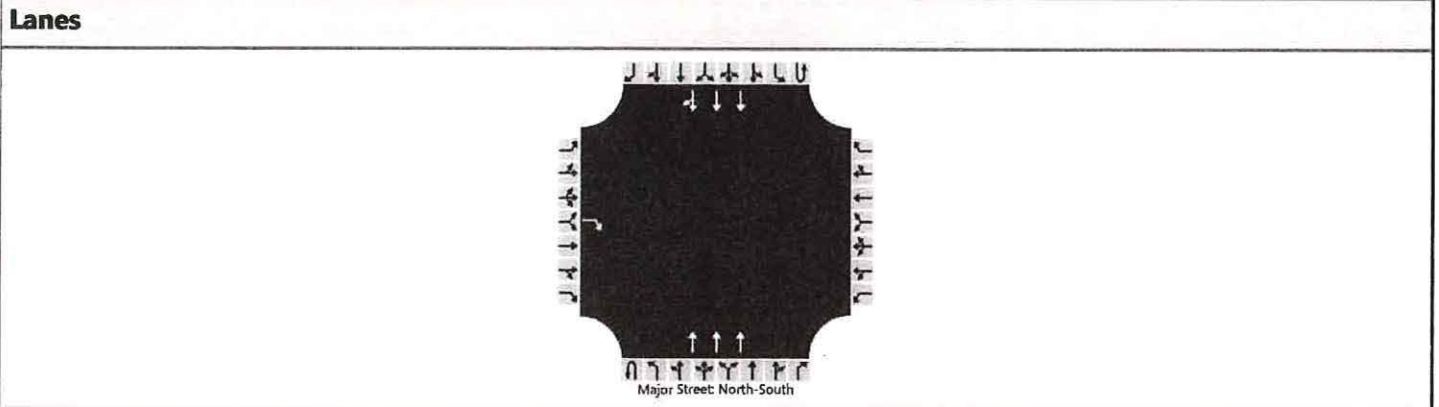
**ROYAL PALM  
MULTIFAMILY RPD**

Figure 3



# HCS Two-Way Stop-Control Report

General Information		Site Information	
Analyst	tbt	Intersection	US 41/Site Access
Agency/Co.	TR Transportation Cons.	Jurisdiction	FDOT
Date Performed	12/6/2023	East/West Street	Site Access
Analysis Year	2028	North/South Street	US 41
Time Analyzed	AM Peak Build-out	Peak Hour Factor	0.93
Intersection Orientation	North-South	Analysis Time Period (hrs)	0.25
Project Description	Royal Palm MF		



**Vehicle Volumes and Adjustments**

Approach	Eastbound				Westbound				Northbound				Southbound					
	U	L	T	R	U	L	T	R	U	L	T	R	U	L	T	R		
Priority		10	11	12		7	8	9	1U	1	2	3	4U	4	5	6		
Number of Lanes		0	0	1		0	0	0	0	0	3	0	0	0	3	0		
Configuration				R							T				T	TR		
Volume (veh/h)				31							2563				2683	15		
Percent Heavy Vehicles (%)				0														
Proportion Time Blocked																		
Percent Grade (%)		0																
Right Turn Channelized		No																
Median Type   Storage		Left + Thru									1							

**Critical and Follow-up Headways**

Base Critical Headway (sec)				7.1												
Critical Headway (sec)				7.10												
Base Follow-Up Headway (sec)				3.9												
Follow-Up Headway (sec)				3.90												

**Delay, Queue Length, and Level of Service**

Flow Rate, v (veh/h)				33												
Capacity, c (veh/h)				105												
v/c Ratio				0.32												
95% Queue Length, Q <sub>95</sub> (veh)				1.2												
Control Delay (s/veh)				54.6												
Level of Service (LOS)				F												
Approach Delay (s/veh)		54.6														
Approach LOS		F														

# HCS Two-Way Stop-Control Report

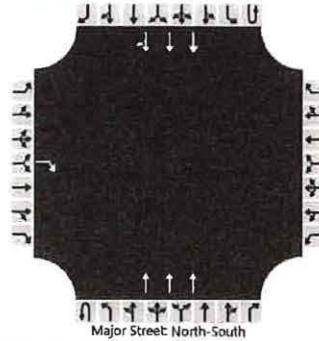
## General Information

Analyst	tbt
Agency/Co.	TR Transportation Cons.
Date Performed	12/6/2023
Analysis Year	2028
Time Analyzed	PM Peak Build-out
Intersection Orientation	North-South
Project Description	Royal Palm MF

## Site Information

Intersection	US 41/Site Access
Jurisdiction	FDOT
East/West Street	Site Access
North/South Street	US 41
Peak Hour Factor	0.93
Analysis Time Period (hrs)	0.25

## Lanes



## Vehicle Volumes and Adjustments

Approach	Eastbound				Westbound				Northbound				Southbound					
	U	L	T	R	U	L	T	R	U	L	T	R	U	L	T	R		
Priority		10	11	12		7	8	9	1U	1	2	3	4U	4	5	6		
Number of Lanes		0	0	1		0	0	0	0	0	3	0	0	0	3	0		
Configuration				R							T				T	TR		
Volume (veh/h)				25							2719				3093	42		
Percent Heavy Vehicles (%)				0														
Proportion Time Blocked																		
Percent Grade (%)		0																
Right Turn Channelized		No																
Median Type   Storage		Left + Thru									1							

## Critical and Follow-up Headways

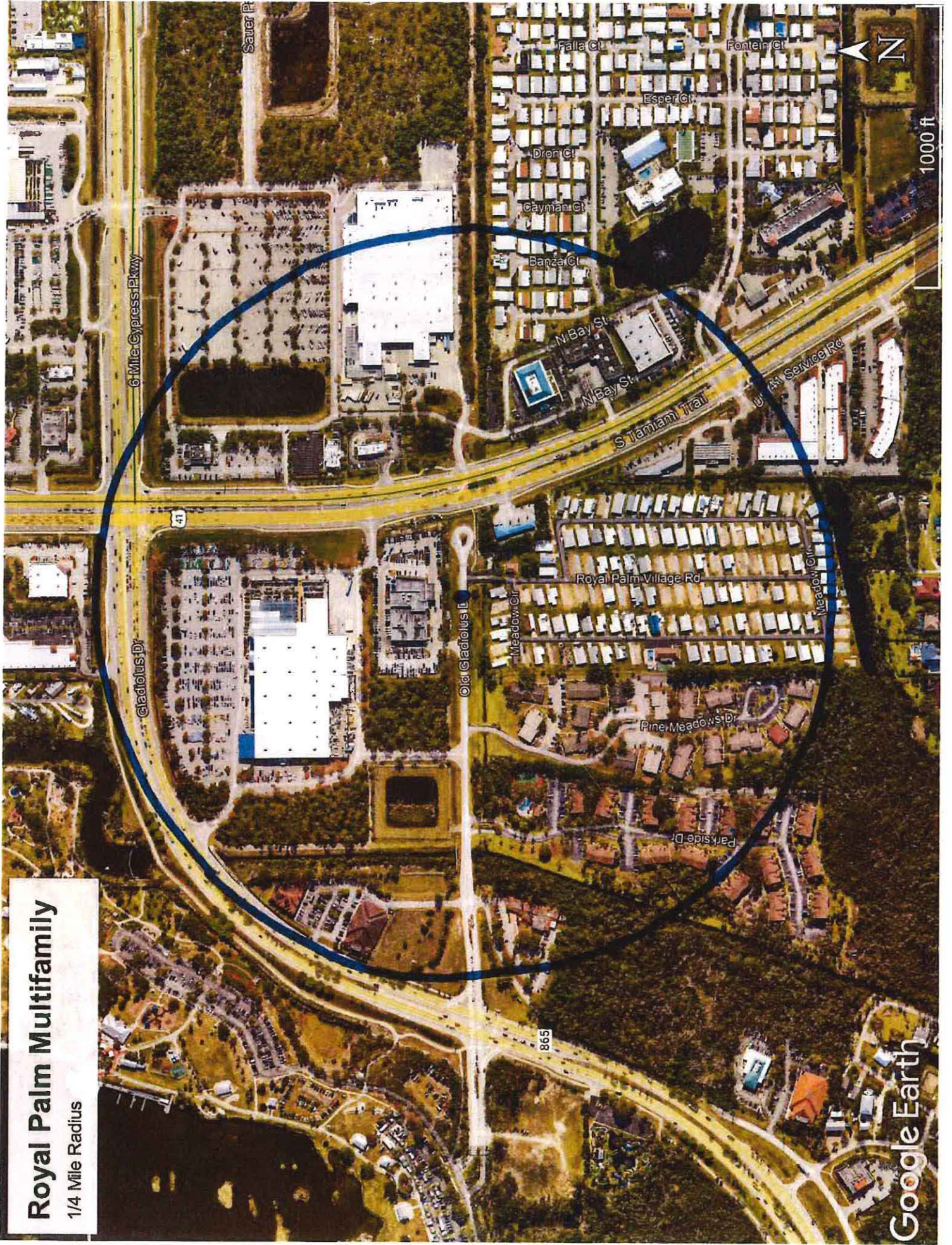
Base Critical Headway (sec)				7.1												
Critical Headway (sec)				7.10												
Base Follow-Up Headway (sec)				3.9												
Follow-Up Headway (sec)				3.90												

## Delay, Queue Length, and Level of Service

Flow Rate, v (veh/h)				27												
Capacity, c (veh/h)				72												
v/c Ratio				0.37												
95% Queue Length, Q <sub>95</sub> (veh)				1.4												
Control Delay (s/veh)				81.7												
Level of Service (LOS)				F												
Approach Delay (s/veh)		81.7														
Approach LOS		F														

# Royal Palm Multifamily

1/4 Mile Radius



**TABLE 1A  
LEVEL OF SERVICE THRESHOLDS  
2045 LONG RANGE TRANSPORTATION ANALYSIS - ROYAL PALM VILLAGE  
Revised 1-30-2024**

ROADWAY	ROADWAY SEGMENT	2045 E + C NETWORK LANES		GENERALIZED SERVICE VOLUMES				
		# Lanes	Roadway Designation	LOS A VOLUME	LOS B VOLUME	LOS C VOLUME	LOS D VOLUME	LOS E VOLUME
Gladiolus Drive	W. of Bass Rd.	4LD	Arterial	0	250	1,840	1,960	1,960
	W. of Winkler Rd.	6LD	Arterial	0	400	2,840	2,940	2,940
	W. of Summerlin Rd.	6LD	Arterial	0	400	2,840	2,940	2,940
	W. of US 41	6LD	Arterial	0	400	2,840	2,940	2,940
Six Mile Cypress Pkwy	W. of Metro Pkwy	4LD	Controlled Access Facility	0	270	1,970	2,100	2,100
	S. of Daniels Pkwy	4LD	Controlled Access Facility	0	270	1,970	2,100	2,100
	N. of Daniels Pkwy	4LD	Controlled Access Facility	0	270	1,970	2,100	2,100
US 41	N. of College Pkwy	6LD	Arterial	0	0	2,940	3,020	3,020
	S. of College Pkwy	6LD	Arterial	0	0	2,940	3,020	3,020
	S. of Daniels Pkwy	6LD	Arterial	0	0	2,940	3,020	3,020
	S. of Six Mile Cypress	6LD	Arterial	0	0	2,940	3,020	3,020
	S. of Island Park Rd.	6LD	Arterial	0	0	2,940	3,020	3,020
	S. of Alico Rd.	6LD	Arterial	0	0	2,940	3,020	3,020
Metro Pkwy/Michael Rippe	N. of Daniels Pkwy	6LD	Arterial	0	0	2,940	3,020	3,020
	S. of Daniels Pkwy	6LD	Arterial	0	0	2,940	3,020	3,020
	N. of Alico Rd.	6LD	Arterial	0	0	2,940	3,020	3,020
Summerlin Rd	W. of Bass Rd.	6LD	Controlled Access Facility	0	430	3,050	3,180	3,180
	W. of Winkler Rd.	6LD	Controlled Access Facility	0	430	3,050	3,180	3,180
	W. of Gladiolus Dr.	6LD	Controlled Access Facility	0	430	3,050	3,180	3,180
	S. of Cypress Lake Dr.	4LD	Controlled Access Facility	0	270	1,970	2,100	2,100
	S. of College Pkwy	6LD	Controlled Access Facility	0	430	3,050	3,180	3,180
	N. of College Pkwy	6LD	Controlled Access Facility	0	430	3,050	3,180	3,180
Winkler Rd.	S. of Summerlin Rd.	2LN	Arterial	0	140	800	860	860
	N. of Summerlin Rd.	4LN	Arterial	0	250	1,840	1,960	1,960
	N. of Gladiolus Dr.	2LN	Arterial	0	140	800	860	860
	N. of Cypress Lake Dr.	4LD	Arterial	0	250	1,840	1,960	1,960
	N. of College Pkwy	2LN	Arterial	0	140	800	860	860
Cypress Lake/Daniels Pkwy	W. of Winkler Rd.	4LD	Arterial	0	250	1,840	1,960	1,960
	W. of Summerlin Rd.	4LD	Arterial	0	250	1,840	1,960	1,960
	W. of U.S. 41	6LD	Controlled Access Facility	0	430	3,050	3,180	3,180
	W. of Metro Pkwy	6LD	Controlled Access Facility	0	430	3,050	3,180	3,180
	W. of Six Mile Cypress Pkwy	6LD	Controlled Access Facility	0	430	3,050	3,180	3,180
	E. of Six Mile Cypress Pkwy	6LD	Controlled Access Facility	0	430	3,050	3,180	3,180
Alico Road	E. of U.S. 41	6LD	Arterial	0	400	2,840	2,940	2,940

- Denotes the LOS Standard for each roadway segment

\* Level of Service Thresholds for Lee County roadways were taken from the Generalized Peak Hour Directional Service Volume tables for Urbanized Areas (dated April 2016)  
 \* Level of Service Thresholds for State maintained roadways were taken from FDOT's Generalized Peak Hour Directional Volumes for Florida's Urbanized Areas Table 7.

**TABLE 2A**  
**2045 ROADWAY LINK LEVEL OF SERVICE CALCULATIONS**  
**ROYAL PALM VILLAGE**

Revised 1-30-2024

TOTAL PM PEAK HOUR PROJECT TRAFFIC = 173 VPH      IN= 40      OUT= 133

ROADWAY	ROADWAY SEGMENT	2045		AADT BACKGROUND TRAFFIC	K-100 FACTOR	100TH HIGHEST HOUR PK DIR		PM PK HR PEAK DIRECTION	2045 PK HR PEAK DIRECTION TRAFFIC VOLUMES & LOS		PROJECT TRAFFIC DIST.	PK DIR PM PROJ TRAFFIC	2045 BACKGROUND PLUS PROJ PEAK DIRECTION TRAFFIC VOLUMES & LOS	
		FSUTMS AADT	COUNTY PCS / FDOT SITE #			2-WAY VOLUME	D		VOLUME <sup>1</sup>	LOS			VOLUME	LOS
Gladiolus Drive	W. of Bass Rd.	32,113	46	32,113	0.088	2,826	0.58	WEST	1,639	C	3%	4	1,643	C
	W. of Winkler Rd.	38,658	46	38,658	0.088	3,402	0.58	WEST	1,973	C	5%	7	1,980	C
	W. of Summerlin Rd.	35,076	46	35,076	0.088	3,087	0.58	WEST	1,790	C	5%	7	1,797	C
	W. of US 41	59,546	46	59,546	0.088	5,240	0.58	WEST	3,039	F	20%	27	3,066	F
Six Mile Cypress Pkwy	W. of Metro Pkwy	30,497	18	30,497	0.090	2,745	0.61	WEST	1,674	C	30%	40	1,714	C
	S. of Daniels Pkwy	29,968	18	29,968	0.090	2,697	0.61	WEST	1,645	C	10%	13	1,658	C
	N. of Daniels Pkwy	17,392	18	17,392	0.090	1,565	0.61	WEST	955	C	2%	3	958	C
US 41	N. of College Pkwy	48,751	109	48,751	0.091	4,436	0.54	NORTH	2,395	C	8%	11	2,406	C
	S. of College Pkwy	61,014	109	61,014	0.091	5,552	0.54	NORTH	2,998	D	10%	13	3,011	D
	S. of Daniels Pkwy	56,815	109	56,815	0.091	5,170	0.54	NORTH	2,792	C	30%	40	2,832	C
	S. of Six Mile Cypress	62,085	109	62,085	0.091	5,650	0.54	NORTH	3,051	F	40%	53	3,104	F
	S. of Island Park Rd.	61,372	109	61,372	0.091	5,585	0.54	NORTH	3,016	D	25%	33	3,049	F
	S. of Alico Rd.	50,161	109	50,161	0.091	4,565	0.54	NORTH	2,465	C	10%	13	2,478	C
Metro Pkwy/Michael Rippe	N. of Daniels Pkwy	34,301	3809	34,301	0.109	3,739	0.51	NORTH	1,907	C	10%	13	1,920	C
	S. of Daniels Pkwy	36,804	3809	36,804	0.109	4,012	0.51	NORTH	2,046	C	20%	27	2,073	C
	N. of Alico Rd.	29,648	3809	29,648	0.109	3,232	0.51	NORTH	1,648	C	0%	0	1,648	C
Summerlin Rd.	W. of Bass Rd.	43,033	47	43,033	0.108	4,648	0.61	NORTH	2,835	C	2%	3	2,838	C
	W. of Winkler Rd.	41,924	47	41,924	0.108	4,528	0.61	NORTH	2,762	C	5%	7	2,769	C
	W. of Gladiolus Dr.	46,095	47	46,095	0.108	4,978	0.61	NORTH	3,037	C	10%	13	3,050	D
	S. of Cypress Lake Dr.	28,644	47	28,644	0.108	3,094	0.61	NORTH	1,887	C	0%	0	1,887	C
	S. of College Pkwy	33,180	47	33,180	0.108	3,583	0.61	NORTH	2,186	C	2%	3	2,189	C
	N. of College Pkwy	46,696	47	46,696	0.108	5,043	0.61	NORTH	3,076	D	0%	0	3,076	D
Winkler Rd.	S. of Summerlin Rd.	15,903	37	15,903	0.089	1,415	0.57	SOUTH	807	D	0%	0	807	D
	N. of Summerlin Rd.	8,326	37	8,326	0.089	741	0.57	SOUTH	422	C	1%	1	423	C
	N. of Gladiolus Dr.	13,716	37	13,716	0.089	1,221	0.57	SOUTH	696	C	1%	1	697	C
	N. of Cypress Lake Dr.	21,996	37	21,996	0.089	1,958	0.57	SOUTH	1,116	C	0%	0	1,116	C
	N. of College Pkwy	5,535	37	5,535	0.089	493	0.57	SOUTH	281	C	0%	0	281	C
Cypress Lake/Daniels Pkwy	W. of Winkler Rd.	23,695	82	23,695	0.095	2,251	0.53	WEST	1,193	C	5%	7	1,200	C
	W. of Summerlin Rd.	42,282	82	42,282	0.095	4,017	0.53	WEST	2,129	F	6%	8	2,137	F
	W. of U.S. 41	43,755	82	43,755	0.095	4,157	0.53	WEST	2,203	C	10%	13	2,216	C
	W. of Metro Pkwy	57,305	30	57,305	0.092	5,272	0.51	WEST	2,689	C	5%	7	2,696	C
	W. of Six Mile Cypress Pkwy	56,316	30	56,316	0.092	5,181	0.51	WEST	2,642	C	3%	4	2,646	C
	E. of Six Mile Cypress Pkwy	78,589	30	78,589	0.092	7,230	0.51	WEST	3,687	F	8%	11	3,698	F
Alico Road	E. of U.S. 41	33,454	10	33,454	0.092	3,078	0.53	EAST	1,631	C	15%	20	1,651	C

<sup>1</sup> The 2045 Pk Hr Pk Direction Traffic Volumes were calculated by adjusting the 2045 AADT volumes obtained from the adopted FSUTMS model by the appropriate K and D factors.  
\* The K-100 and D factors for County maintained roadways were obtained from 2022 Lee County Traffic Count Report.

**TABLE 3A  
LEVEL OF SERVICE THRESHOLDS  
ROYAL PALM VILLAGE**

Revised 1-30-2024

ROADWAY	ROADWAY SEGMENT	# LANES	ROADWAY DESIGNATION	GENERALIZED SERVICE VOLUMES				
				LOS A	LOS B	LOS C	LOS D	LOS E
				VOLUME	VOLUME	VOLUME	VOLUME	VOLUME
Gladiolus Drive	W. of Bass Rd.	4LD	Arterial	0	250	1,840	1,960	1,960
	W. of Winkler Rd.	6LD	Arterial	0	400	2,840	2,940	2,940
	W. of Summerlin Rd.	6LD	Arterial	0	400	2,840	2,940	2,940
	W. of US 41	6LD	Arterial	0	400	2,840	2,940	2,940
Six Mile Cypress Pkwy	W. of Metro Pkwy	4LD	Controlled Access Facility	0	270	1,970	2,100	2,100
	S. of Daniels Pkwy	4LD	Controlled Access Facility	0	270	1,970	2,100	2,100
	N. of Daniels Pkwy	4LD	Controlled Access Facility	0	270	1,970	2,100	2,100
US 41	N. of College Pkwy	6LD	Arterial	0	0	2,940	3,020	3,020
	S. of College Pkwy	6LD	Arterial	0	0	2,940	3,020	3,020
	S. of Daniels Pkwy	6LD	Arterial	0	0	2,940	3,020	3,020
	S. of Six Mile Cypress	6LD	Arterial	0	0	2,940	3,020	3,020
	S. of Island Park Rd.	6LD	Arterial	0	0	2,940	3,020	3,020
	S. of Alico Rd.	6LD	Arterial	0	0	2,940	3,020	3,020
Metro Pkwy/Michael Rippe	N. of Daniels Pkwy	6LD	Arterial	0	0	2,940	3,020	3,020
	S. of Daniels Pkwy	6LD	Arterial	0	0	2,940	3,020	3,020
	N. of Alico Rd.	6LD	Arterial	0	0	2,940	3,020	3,020
Summerlin Rd.	W. of Bass Rd.	6LD	Controlled Access Facility	0	430	3,050	3,180	3,180
	W. of Winkler Rd.	6LD	Controlled Access Facility	0	430	3,050	3,180	3,180
	W. of Gladiolus Dr.	6LD	Controlled Access Facility	0	430	3,050	3,180	3,180
	S. of Cypress Lake Dr.	4LD	Controlled Access Facility	0	270	1,970	2,100	2,100
	S. of College Pkwy	6LD	Controlled Access Facility	0	430	3,050	3,180	3,180
	N. of College Pkwy	6LD	Controlled Access Facility	0	430	3,050	3,180	3,180
Winkler Rd.	S. of Summerlin Rd.	2LN	Arterial	0	140	800	860	860
	N. of Summerlin Rd.	4LN	Arterial	0	250	1,840	1,960	1,960
	N. of Gladiolus Dr.	2LN	Arterial	0	140	800	860	860
	N. of Cypress Lake Dr.	4LD	Arterial	0	250	1,840	1,960	1,960
	N. of College Pkwy	2LN	Arterial	0	140	800	860	860

**TABLE 4A  
LEE COUNTY TRAFFIC COUNTS AND CALCULATIONS  
ROYAL PALM VILLAGE**

TOTAL PROJECT TRAFFIC AM = 173 VPH IN = 40 OUT= 133  
 TOTAL PROJECT TRAFFIC PM = 164 VPH IN= 100 OUT= 64

Revised 1-30-2024

ROADWAY	ROADWAY SEGMENT	LDCOT PCS OR FOOT SITE #	BASE YR	2021 ADT	YRS OF GROWTH <sup>1</sup>	ANNUAL RATE	2021 PK SEASON			PERCENT V/C	2028 BCKGRND			2028 BCKGRND					
							PK HR	PK DIR.	PK SEASON		AM PROJ	PM PROJ	+ AM PROJ	V/C	+ PM PROJ	V/C			
			ADT				PK HR	PK DIR.	PK SEASON	PROJECT TRAFFIC	AM PROJ TRAFFIC	PM PROJ TRAFFIC	+ AM PROJ VOLUME	LOS	Ratio	+ PM PROJ VOLUME	LOS	Ratio	
Gladiolus Drive	W. of Bass Rd.	73	22600	23000	7	2.00%	1,149	1,320	C	0.67	3%	4	3	1,324	C	0.68	1,323	C	0.67
	W. of Winkler Rd.	73	22600	23000	7	2.00%	1,149	1,320	C	0.45	5%	7	5	1,326	C	0.45	1,325	C	0.45
	W. of Summerlin Rd.	73	22600	23000	7	2.00%	1,149	1,320	C	0.45	5%	7	5	1,326	C	0.45	1,325	C	0.45
	W. of US 41	73	42000	46500	7	2.00%	2,227	2,558	C	0.87	20%	27	20	2,585	C	0.88	2,578	C	0.88
Six Mile Cypress Pkwy	W. of Metro Pkwy	30	36,500	40,000	7	2.00%	1,941	2,230	F	1.08	30%	40	30	2,269	F	1.08	2,260	F	1.08
	S. of Daniels Pkwy	30	30,600	32,500	7	2.00%	1,371	1,575	C	0.75	10%	13	10	1,588	C	0.76	1,585	C	0.75
	N. of Daniels Pkwy	30	20,200	23,500	7	2.19%	951	1,108	C	0.53	2%	3	2	1,109	C	0.53	1,108	C	0.53
US 41	N. of College Pkwy	109	58,000	71,500	7	3.03%	2,598	3,203	F	1.06	8%	11	8	3,213	F	1.06	3,211	F	1.06
	S. of College Pkwy	109	36,500	40,000	7	2.00%	2,598	2,984	D	0.99	10%	13	10	2,998	D	0.99	2,994	D	0.99
	S. of Daniels Pkwy	109	36,500	40,000	7	2.00%	2,509	2,882	C	0.95	30%	40	30	2,922	C	0.97	2,912	C	0.96
	S. of Six Mile Cypress	109	65,500	71,000	7	2.00%	3,171	3,642	F	1.21	40%	53	40	3,696	F	1.22	3,682	F	1.22
	S. of Island Park Rd.	109	53,000	60,000	7	2.00%	3,171	3,642	F	1.21	25%	33	25	3,676	F	1.22	3,667	F	1.21
	S. of Alico Rd.	109	50,000	62,500	7	3.24%	3,171	3,964	F	1.31	10%	13	10	3,977	F	1.32	3,974	F	1.32
Metro Pkwy/Michael Rippe	N. of Daniels Pkwy	3809	21,641	25,000	7	2.08%	1,184	1,368	C	0.45	10%	13	10	1,381	C	0.46	1,378	C	0.46
	S. of Daniels Pkwy	3809	23,000	25,000	7	2.00%	1,136	1,305	C	0.43	20%	27	20	1,332	C	0.44	1,325	C	0.44
	N. of Alico Rd.	3809	23,500	33,500	7	5.20%	1,397	1,991	C	0.68	0%	0	0	1,991	C	0.66	1,991	C	0.66
Summerlin Rd	W. of Bass Rd.	47	31,800	38,700	7	2.85%	1,928	2,346	C	0.74	2%	3	2	2,349	C	0.74	2,346	C	0.74
	W. of Winkler Rd.	47	31,800	38,700	7	2.85%	1,928	2,346	C	0.74	5%	7	5	2,353	C	0.74	2,351	C	0.74
	W. of Gladiolus Dr.	47	31,800	38,700	7	2.85%	1,928	2,346	C	0.74	10%	13	10	2,360	C	0.74	2,356	C	0.74
	S. of Cypress Lake Dr.	47	22,800	24,700	7	2.00%	1,530	1,757	C	0.84	0%	0	0	1,757	C	0.84	1,757	C	0.84
	S. of College Pkwy	47	22,800	24,700	7	2.00%	1,808	2,077	C	0.65	2%	3	2	2,079	C	0.65	2,079	C	0.65
	N. of College Pkwy	35	31,500	31,500	7	2.00%	1,802	2,070	C	0.65	0%	0	0	2,070	C	0.65	2,070	C	0.65
Winkler Rd	S. of Summerlin Rd.	39	6,400	6,200	6	2.00%	461	530	C	0.62	0%	0	0	530	C	0.62	530	C	0.62
	N. of Summerlin Rd.	39	6,400	6,200	6	2.00%	276	317	C	0.16	1%	1	1	318	C	0.16	318	C	0.16
	N. of Gladiolus Dr.	39	45,200	45,000	9	2.00%	593	681	C	0.79	1%	1	1	683	C	0.79	682	C	0.79
	N. of Cypress Lake Dr.	39	45,200	45,000	9	2.00%	746	857	C	0.44	0%	0	0	857	C	0.44	857	C	0.44
	N. of College Pkwy	39	45,200	45,000	9	2.00%	350	402	C	0.47	0%	0	0	402	C	0.47	402	C	0.47
Cypress Lake/Daniels Pkwy	W. of Winkler Rd.	82	29,000	26,000	15	2.00%	1,419	1,630	C	0.83	5%	7	5	1,637	C	0.51	1,635	C	0.83
	W. of Summerlin Rd.	82	29,000	26,000	15	2.00%	1,419	1,630	C	0.83	6%	8	6	1,638	C	0.52	1,636	C	0.83
	W. of U.S. 41	82	29,000	26,000	15	2.00%	2,085	2,395	C	0.75	10%	13	10	2,408	C	0.76	2,405	C	0.76
	W. of Metro Pkwy	30	29,000	26,000	15	2.00%	2,288	2,628	C	0.83	5%	7	5	2,635	C	1.25	2,633	C	0.83
	W. of Six Mile Cypress Pkwy	30	29,000	26,000	15	2.00%	2,109	2,423	C	0.76	3%	4	3	2,427	C	0.76	2,426	C	0.76
	E. of Six Mile Cypress Pkwy	30	29,000	26,000	15	2.00%	2,985	3,429	F	1.08	8%	11	8	3,439	F	1.08	3,437	F	1.08
Alico Road	E. of U.S. 41	10	25,223	45,500	13	4.64%	1,171	1,609	C	0.55	15%	20	15	1,629	C	0.55	1,624	C	0.55

<sup>1</sup> AGR for all roadways was calculated based the historical traffic data obtained from the Lee County Traffic Count Report and Florida Traffic Online webpage.

<sup>2</sup> Current peak hour peak season peak direction traffic volumes for all County roadways were obtained from the 2022 Lee County Public Facilities Level of Service and Concurrency Report.

**TABLE 6A  
LEE COUNTY TRAFFIC COUNTS AND CALCULATIONS  
ROYAL PALM VILLAGE**

Revised 1-31-2024

TOTAL PROJECT TRAFFIC AM = 160 VPH IN = 37 OUT= 123  
 TOTAL PROJECT TRAFFIC PM = 153 VPH IN= 93 OUT= 60

ROADWAY	ROADWAY SEGMENT	LCDOT PCS OR FDOT SITE #	BASE YR ADT	2021 ADT	YRS OF GROWTH <sup>1</sup>	ANNUAL RATE	2021	2028		V/C	PERCENT PROJECT	AM PROJ TRAFFIC	PM PROJ TRAFFIC	2028			2028		
							PK SEASON PEAK DIR <sup>2</sup>	PK HR	PK SEASON					PK HR	BCKGRND VOLUME	LOS	Ratio	BCKGRND VOLUME	LOS
Gladiolus Drive	W. of Summerlin Rd.	73	22600	23000	7	2.00%	1,149	1,320	C	0.45	5%	6	5	1,326	C	0.45	1,324	C	0.45
	W. of US 41	73	42000	46500	7	2.00%	2,227	2,558	C	0.87	20%	25	19	2,583	C	0.88	2,577	C	0.88
Six Mile Cypress Pkwy	W. of Metro Pkwy	30	36,500	40,000	7	2.00%	1,941	2,230	F	1.06	30%	37	28	2,266	F	1.08	2,257	F	1.07
	S. of Daniels Pkwy	30	30,600	32,500	7	2.00%	1,371	1,575	C	0.75	10%	12	9	1,587	C	0.76	1,584	C	0.75
US 41	S. of Daniels Pkwy	109	36,500	40,000	7	2.00%	2,509	2,882	C	0.95	30%	37	28	2,919	C	0.97	2,910	C	0.96
	S. of Six Mile Cypress	109	65,500	71,000	7	2.00%	3,002	3,448	F	1.14	40%	49	37	3,498	F	1.16	3,486	F	1.15
	S. of Island Park Rd.	109	53,000	60,000	7	2.00%	3,002	3,448	F	1.14	25%	31	23	3,479	F	1.15	3,472	F	1.15

1 AGR for all roadways was calculated based the historical traffic data obtained from the Lee County Traffic Count Report and Florida Traffic Online webpage.

2 Current peak hour peak season peak direction traffic volumes for all County roadways were obtained from the 2022 Lee County Public Facilities Level of Service and Concurrency Report.



## PCS 18 - Six Mile Cypress Pkwy north of Winkler Rd

2022 AADT = 20,700 VPD

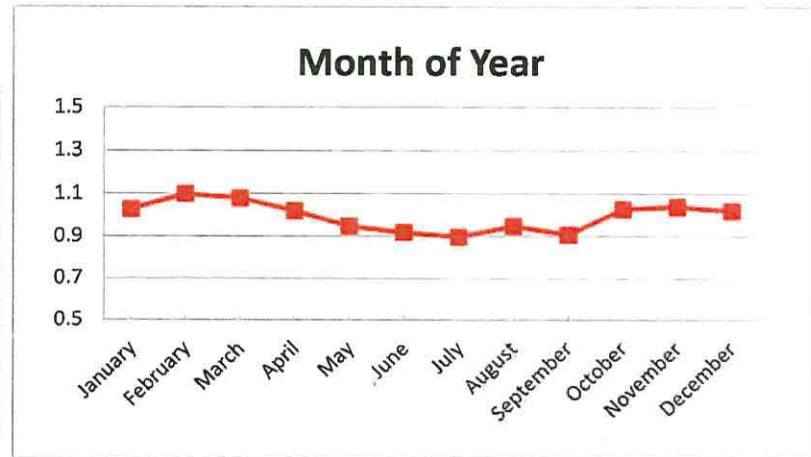
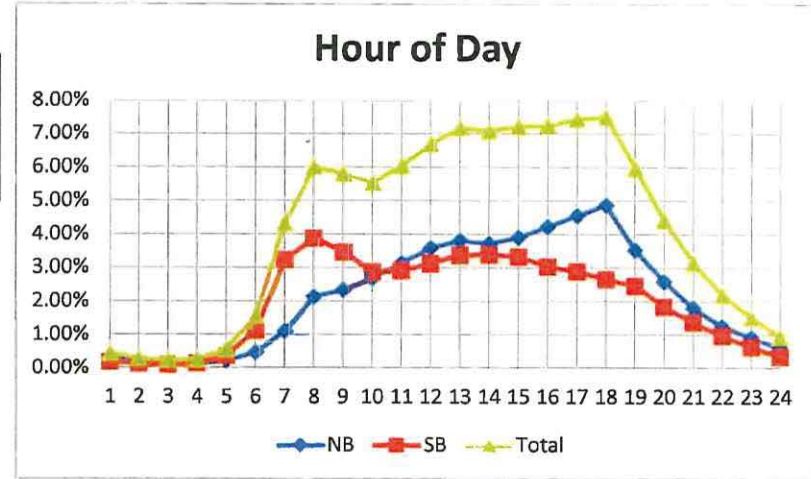
Hour	NB	SB	Total
0	0.28%	0.19%	0.46%
1	0.18%	0.12%	0.30%
2	0.14%	0.10%	0.24%
3	0.13%	0.13%	0.26%
4	0.21%	0.37%	0.58%
5	0.46%	1.12%	1.59%
6	1.10%	3.23%	4.35%
7	2.13%	3.88%	6.02%
8	2.34%	3.47%	5.82%
9	2.69%	2.87%	5.56%
10	3.14%	2.92%	6.06%
11	3.59%	3.13%	6.71%
12	3.81%	3.38%	7.19%
13	3.71%	3.38%	7.10%
14	3.90%	3.33%	7.23%
15	4.23%	3.04%	7.26%
16	4.56%	2.89%	7.45%
17	4.87%	2.66%	7.53%
18	3.53%	2.46%	5.99%
19	2.60%	1.85%	4.44%
20	1.81%	1.37%	3.17%
21	1.24%	0.96%	2.20%
22	0.91%	0.63%	1.53%
23	0.61%	0.34%	0.95%

Month of Year	Fraction
January	1.03
February	1.1
March	1.08
April	1.02
May	0.95
June	0.92
July	0.9
August	0.95
September	0.91
October	1.03
November	1.04
December	1.02

Directional Factor		
AM	0.75	SB
PM	0.61	NB

Day of Week	Fraction
Sunday	0.71
Monday	1.04
Tuesday	1.1
Wednesday	1.1
Thursday	1.08
Friday	1.12
Saturday	0.87

Design Hour Volume		
#	Volume	Factor
5	2134	0.103
10	2081	0.101
20	2000	0.097
30	1961	0.095
50	1917	0.093
100	1868	0.090
150	1837	0.089
200	1812	0.088



## PCS 37 - McGregor Blvd south of Pine Ridge Rd

2022 AADT = 28,100 VPD

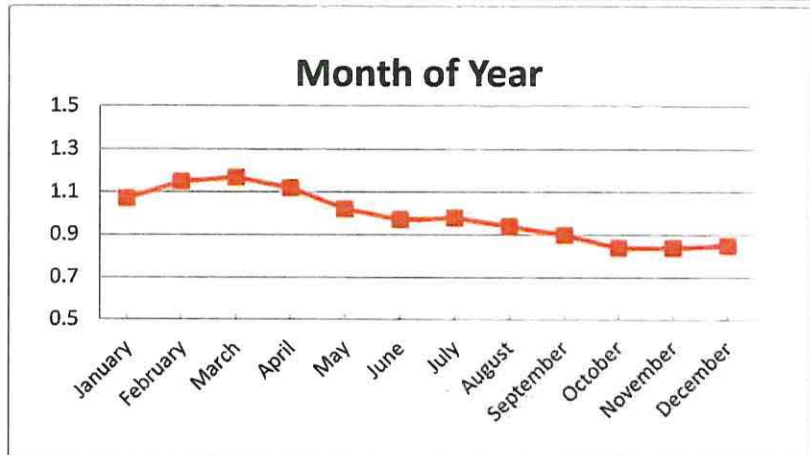
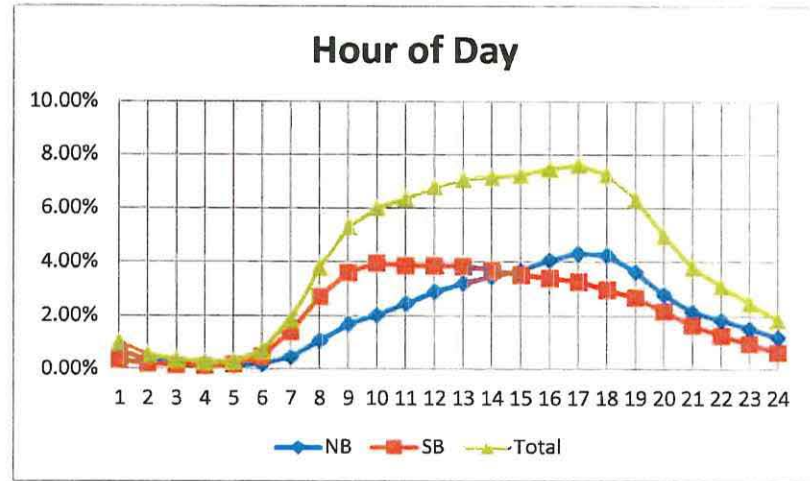
Hour	NB	SB	Total
0	0.69%	0.35%	1.04%
1	0.35%	0.22%	0.57%
2	0.22%	0.16%	0.38%
3	0.18%	0.13%	0.31%
4	0.13%	0.19%	0.31%
5	0.20%	0.50%	0.71%
6	0.46%	1.42%	1.89%
7	1.08%	2.72%	3.81%
8	1.71%	3.61%	5.32%
9	2.04%	3.96%	6.00%
10	2.49%	3.87%	6.36%
11	2.92%	3.87%	6.80%
12	3.22%	3.85%	7.08%
13	3.47%	3.71%	7.17%
14	3.70%	3.54%	7.23%
15	4.08%	3.41%	7.49%
16	4.33%	3.28%	7.62%
17	4.27%	2.99%	7.27%
18	3.65%	2.71%	6.35%
19	2.81%	2.18%	4.99%
20	2.17%	1.66%	3.83%
21	1.85%	1.27%	3.12%
22	1.53%	0.97%	2.50%
23	1.21%	0.65%	1.86%

Month of Year	Fraction
January	1.07
February	1.15
March	1.17
April	1.12
May	1.02
June	0.97
July	0.98
August	0.94
September	0.9
October	0.84
November	0.84
December	0.85

Day of Week	Fraction
Sunday	0.82
Monday	1.01
Tuesday	1.04
Wednesday	1.06
Thursday	1.04
Friday	1.08
Saturday	0.96

Directional Factor		
AM	0.75	SB
PM	0.57	NB

Design Hour Volume		
#	Volume	Factor
5	2649	0.094
10	2615	0.093
20	2587	0.092
30	2575	0.092
50	2547	0.091
100	2493	0.089
150	2457	0.087
200	2434	0.087



## PCS 46 - Gladiolus Dr west of US 41

2022 AADT = 46,200 VPD

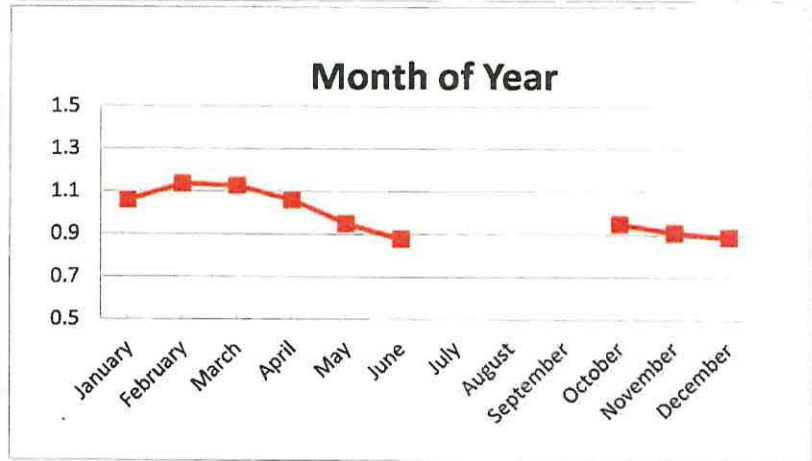
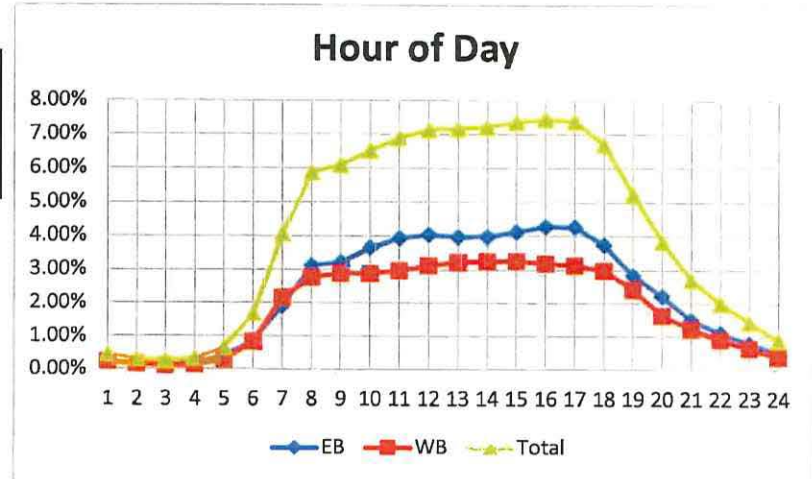
Hour	EB	WB	Total
0	0.24%	0.23%	0.47%
1	0.17%	0.16%	0.33%
2	0.15%	0.12%	0.27%
3	0.20%	0.13%	0.34%
4	0.40%	0.29%	0.68%
5	0.86%	0.84%	1.70%
6	1.90%	2.17%	4.07%
7	3.12%	2.77%	5.89%
8	3.22%	2.89%	6.11%
9	3.66%	2.88%	6.54%
10	3.93%	2.98%	6.91%
11	4.03%	3.12%	7.15%
12	3.96%	3.22%	7.19%
13	3.97%	3.25%	7.23%
14	4.11%	3.26%	7.37%
15	4.27%	3.20%	7.47%
16	4.26%	3.13%	7.39%
17	3.74%	2.98%	6.72%
18	2.83%	2.42%	5.25%
19	2.22%	1.63%	3.85%
20	1.50%	1.23%	2.73%
21	1.11%	0.90%	2.01%
22	0.80%	0.65%	1.45%
23	0.52%	0.38%	0.90%

Month of Year	Fraction
January	1.06
February	1.14
March	1.13
April	1.06
May	0.95
June	0.88
July	
August	
September	
October	0.95
November	0.91
December	0.89

Directional Factor		
AM	0.53	WB
PM	0.58	EB

Day of Week	Fraction
Sunday	0.74
Monday	1.04
Tuesday	1.08
Wednesday	1.1
Thursday	1.06
Friday	1.08
Saturday	0.89

Design Hour Volume		
#	Volume	Factor
5	4350	0.094
10	4314	0.093
20	4259	0.092
30	4233	0.092
50	4173	0.090
100	4085	0.088
150	4031	0.087
200	3971	0.086



Kevin Ruane  
*District One*

January 29, 2024

Cecil L. Pendergrass  
*District Two*

Fred Drovdljic, AICP  
Director of Planning

Ray Sandelli  
*District Three*

**Flournoy RPD**  
**Letter of Service Availability Request**

Brian Hamman  
*District Four*

Mike Greenwell  
*District Five*

Mr. Fred,

Roger Desjarlais  
*County Manager*

LeeTran has reviewed your request for service availability regarding a proposed Comprehensive Plan Amendment. After reviewing the site and comparing the location with our existing and planned route locations according to the 2021 Transit Development Plan (TDP), the following has been determined:

Richard Wesch  
*County Attorney*

Donna Marie Collins  
*County Hearing Examiner*

- Subject area is within one-quarter mile of a fixed-route corridor
- Closest bus stop, #11490 is within one-quarter mile of the subject parcels
- The 2021 TDP does identify the need for enhanced or additional transit services in the area

The proposed development is within one-quarter mile of a fixed-route corridor and the closest bus stop is # 11490. If this becomes a DO or LDO type D, the developer must provide an 8' x 30', landing pad within the road right-of-way or dedicated easement, however, there is a sidewalk that can be considered within these dimensions; the only improvement that will need to be completed is an installation of a bicycle storage rack. Therefore, the developer would be required to make the necessary improvements based on the current Lee County Transit LDC section 10-442 (a)(1) but will be reassessed at the time of DO/LDO.

If transit services have been modified within one-quarter mile of the subject parcels at the time of a DO or LDO type D submittal, necessary improvements will be determined at that time.

If you have any questions or require further information, please do not hesitate to contact me at (239) 533-0340 or [cmarinodiaz@leegov.com](mailto:cmarinodiaz@leegov.com).

Sincerely,

*Clarissa Marino Diaz*

Clarissa Marino Diaz,

Transit Service Planner

Phone: (239) 533-0340



Lee County  
*Southwest Florida*

Board of County Commissioners

Kevin Ruane  
District One

Cecil L. Pendergrass  
District Two

Ray Sandelli  
District Three

Brian Hamman  
District Four

Mike Greenwell  
District Five

Roger Desjarlais  
County Manager

Richard Wm. Wesch  
County Attorney

Donna Marie Collins  
County Hearing  
Examiner

November 16, 2023

Fred Drovdlc  
Rvi Planning + Landscape Architecture  
10401 Highland Manor Dr. #220  
Tampa, FL 33610

Re: Letter of Service Availability – Flournoy CPA

Mr. Drovdlc,

I am in receipt of your letter requesting a Letter of Service Availability for a Comprehensive Plan Amendment. The property consists of 1 parcel totaling 19.33+/- acres located on the southwest corner of Old Gladius Road and US Highway 41. The Applicant is proposing Large-Scale Comprehensive Plan Map amendment to change the Future Land Use designation of the property from “Central Urban” to the “Intensive Development” classification.

Lee County Emergency Medical Services is the primary EMS transport agency responsible for coverage at the location you have provided. There is one ambulance located 1.6 miles east. A second location is 2.3 miles west.

It is our opinion that the EMS service availability for the proposed development of this property is adequate at this time. Should the plans change, a new analysis of this impact would be required.

Sincerely,

Benjamin Abes  
Director, Public Safety



## THE SCHOOL DISTRICT OF LEE COUNTY

**Jacqueline Heredia**

District Planning Specialist

2855 Colonial Boulevard, Fort Myers, FL 33966 | O: 239.335.1494

November 16, 2023

RE: Flournoy -Comprehensive Plan Amendment

Dear Fred Drovdic:

This letter is in response to your request for concurrency review dated November 10, 2023, for the subject property in Old Gladius Road and US highway 41 in regard to educational impact. This project is located in South choice Zone.

This development is a request for 391 Multifamily housing units. With regard to the inter-local agreement for school concurrency the generation rates are created from the type of dwelling unit and further broken down by grade level.

For multi-family homes, the generation rate is .042 and further broken down by grade level into the following, .035 for elementary, .017 for middle and .039 for high. A total of 16.82 school-aged children would be generated and utilized for the purpose of determining sufficient capacity to serve the development.

The Concurrency Analysis attached, displays the impact of this development. Capacity is an issue within the Concurrency Service Area (CSA) at the elementary school level, however, capacity is available in the adjacent CSA.

Thank you and if I may be of further assistance, please contact me at 239-335-1494

Sincerely,

Jacqueline Heredia, District Planning Specialist

LEE COUNTY SCHOOL DISTRICT'S SCHOOL CONCURRENCY ANALYSIS

REVIEWING AUTHORITY Lee County School District  
 NAME/CASE NUMBER Flournoy Multifamily  
 OWNER/AGENT RVI Planning + Landscape Architecture  
 ITEM DESCRIPTION

LOCATION Old Gladiud Road US 41  
 ACRES 19.33  
 CURRENT FLU  
 CURRENT ZONING RPD

PROPOSED DWELLING UNITS BY TYPE	Single Family	Multi Family	Mobile Home
		391	

STUDENT GENERATION	Student Generation Rates			Projected Students
	SF	MF	MH	
Elementary School	0.035	0.015		5.87
Middle School	0.017	0.009		3.52
High School	0.039	0.019		7.43

Source: Lee County School District, September 8, 2018 letter

CSA SCHOOL NAME 2022/23	CSA Capacity (1)	CSA Projected Enrollment (2)	CSA Available Capacity	Projected Impact of Project	Available Capacity W/Impact	LOS is 100% Perm FISH Capacity	Adjacent CSA Available Capacity w/Impact
South CSA, Elementary	14,234	14,026	208	6	202	99%	
South CSA, Middle	7,293	6,912	381	4	377	95%	
South CSA, High	9,536	8,492	1,044	7	1037	89%	

(1) Permanent Capacity as defined in the Interlocal Agreement and adopted in the five (5) years of the School District's Five Year Plan  
 (2) Projected Enrollment per the five (5) years of the School District's Five Year Plan plus any reserved capacity (development has a valid finding of capacity)  
 (3) Available Adjacent CSA capacity is subject to adjacency criteria as outlined in the Interlocal Agreement and the School District's School Concurrency Manual

Prepared by: Jacqueline Heredia, Planning Specialist



Lee County  
*Southwest Florida*

Board of County Commissioners

Kevin Ruane  
District One

November 15, 2023

Cecil L. Pendergrass  
District Two

Ray Sandelli  
District Three

Brian Hamman  
District Four

Mike Greenwell  
District Five

Dave Harner  
County Manager

Richard Wm. Wesch  
County Attorney

Donna Marie Collins  
County Hearing  
Examiner

RVI Planning + Landscape Architecture  
Attn: Lindsey Craig, Planner staff  
10150 Highland Manor Drive, Suite 450  
Tampa, FL 33610  
**RE: Flourney – Comprehensive Plan Amendment  
Letter of Service Availability**

Dear Ms. Craig:

The Lee County Solid Waste Department is capable of providing solid waste collection service for the proposed 391 multi family dwelling units located on the southwest corner of Old Gladius Road and US Highway 41 through our franchised hauling contractors. Disposal of the solid waste from this development will be accomplished at the Lee County Resource Recovery Facility and the Lee-Hendry Regional Landfill. Plans have been made, allowing for growth, to maintain long-term disposal capacity at these facilities.

Please review Lee County Land Development Code, Chapter 10, Section 261, with requirements for on-site space for placement and servicing of solid waste containers. Please note that the property owner will be responsible for all future applicable solid waste assessments and fees.

If you have any questions, please call me at (239) 533-8007.

Sincerely,

*Justin Lighthall*

Justin Lighthall  
Manager, Public Utilities  
Lee County Solid Waste Department



***Carmine Marceno***  
**Sheriff**



***"Proud to Serve"***

**State of Florida**  
**County of Lee**

November 13, 2023

Fred Drovdljic  
RVi Planning + Landscape Architecture  
1514 Broadway, Suite 201  
Fort Myers, Florida 33901

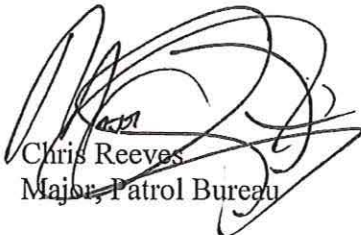
Mr. Drovdljic,

The Lee County Sheriff's Office reviewed your Comprehensive Plan Amendment application request for a 19.33 +/- acre parcel located at the southwest corner of Old Gladiolus Road and U.S. 41 in incorporated Lee County.

The proposed Large-Scale Comprehensive Plan Map amendment would change the Future Land Use designation of the property from "Central Urban" to "Intensive Development" and designate the parcel in the Lee County Utilities (LCU) services area to connect to centralized potable water and sanitary sewer services. We acknowledge that the request would allow for a maximum of 391 multifamily dwelling units, with a proposed population at build out of 1,009 people. Buildout would occur by 2030 dependent upon market demand.

This Agency evaluated your rezoning request solely on its ability to provide law enforcement service to the development. Based on that criterion, we do not object to the proposed development. Law enforcement services will be provided from our Central District offices in Fort Myers. As this development builds out, we will factor its impact into our annual manpower review and make adjustments accordingly. At the time of application for new development orders or building permits, the applicant shall provide a Crime Prevention Through Environmental Design (CPTED) report done by the applicant and given to the Lee County Sheriff's Office for review and comments. Please contact Crime Prevention Practitioner Tiffany Wood at (239) 477-1885 with any questions regarding the CPTED study.

Respectfully,



Chris Reeves  
Major, Patrol Bureau



*"The Lee County Sheriff's Office is an Equal Opportunity Employer"*  
14750 Six Mile Cypress Parkway • Fort Myers, Florida 33912-4406 • (239) 477-1000



**This record search is for informational purposes only and does NOT constitute a project review. This search only identifies resources recorded at the Florida Master Site File and does NOT provide project approval from the Division of Historical Resources. Contact the Compliance and Review Section of the Division of Historical Resources at [CompliancePermits@dos.MyFlorida.com](mailto:CompliancePermits@dos.MyFlorida.com) for project review information.**

November 9, 2023

**Lindsey Craig**

Planner Staff

**RVi Planning + Landscape Architecture**

10150 Highland Manor Drive, Suite 450 • Tampa, FL 33610

813.443.8282 Main

In response to your request on November 9, 2003, the Florida Master Site File lists no cultural resources recorded within Section 35 Township 45S Range 24E for the Flournoy RPD Project, Lee County.

**This search area may contain *unrecorded* archaeological sites, historical structures or other resources even if previously surveyed for cultural resources.**

- **Because vandalism and looting are common at Florida sites, we ask that you limit the distribution of location information on archaeological sites.**
- **While many of our records document historically significant resources, the documentation of a resource at the Florida Master Site File does not necessarily mean the resource is historically significant.**

#

- **Federal, state and local laws require formal environmental review for most projects. This search **DOES NOT** constitute such a review. If your project falls under these laws, you should contact the Compliance and Review Section of the Division of Historical Resources at [CompliancePermits@dos.MyFlorida.com](mailto:CompliancePermits@dos.MyFlorida.com)**

Please do not hesitate to contact us if you have any questions regarding the results of this search.

Sincerely,

Eman M. Vovsi, Ph.D.

Florida Master Site File

[Eman.Vovsi@DOS.MyFlorida.com](mailto:Eman.Vovsi@DOS.MyFlorida.com)



# Lee County

Southwest Florida

## Board of County Commissioners

Kevin Ruane  
District One

November 15, 2023

Cecil L. Pendergrass  
District Two

Fred Drovdlc, AICP  
Planning Director

Ray Sandelli  
District Three

RVI Planning + Landscape Architecture  
1514 Broadway, Suite 201

Brian Hamman  
District Four

Fort Myers, FL 33901

Mike Greenwell  
District Five

**Re: Flournoy – Comprehensive Plan Amendment  
Letter of Service Availability**

Dave Harner, II  
County Manager

Dear Mr. Drovdlc,

Richard Wm. Wesch  
County Attorney

In April 2014, the Lee County Board of County Commissioners adopted a comprehensive plan amendment eliminating concurrency requirements for transportation and parks, and moved both from regulatory to non-regulatory standards. In light of this, we do not have the authority to deny your request based on parks service availability.

Donna Marie Collins  
County Hearing  
Examiner

That being said, the below numbers represent the current required and available acreages for regional and community park land as set forth by the requirements of Policy 95.1.3 in *The Lee Plan*. The Department's available capacity meets the current adopted level-of-service standard, and is projected to meet the adopted level-of-service standard for at least the next five years.

Required Capacity – 5,538 acres of regional parks and 295 acres of community parks

Available Capacity – 7,066 acres of regional parks and 832 acres of community parks

Please feel free to contact me directly at (239) 672-2094 or [ARegnaert@leegov.com](mailto:ARegnaert@leegov.com) if you have further questions.

Sincerely,

Armand Regnaert  
Principal Planner  
Lee County Parks & Recreation  
3410 Palm Beach Blvd  
Fort Myers, FL 33916



Source: Esri, Maxar, Planet, GeoGraphics, and the USDA Community



Lee County  
*Southwest Florida*

**BOARD OF COUNTY COMMISSIONERS**

Kevin Ruane  
*District One*

December 6, 2023

Via E-Mail

Cecil L Pendergrass  
*District Two*

Fred Drovdljic, AICP

Ray Sandelli  
*District Three*

RVI Planning and Landscape Architecture  
1514 Broadway, Suite 201

Brian Hamman  
*District Four*

Fort Myers, FL 33901

Michael Greenwell  
*District Five*

Dave Harner, II  
*County Manager*

**RE: Potable Water and Wastewater Availability  
Chief Court Industrial Rezoning - Royal Plam Villages – 15180 Meadow Cir.  
STRAP # 35-45-24-L2-05000.01CE and Plus See Attached List**

Richard Wm Wesch  
*County Attorney*

Donna Marie Collins  
*County Hearing  
Examiner*

To whom this may concern:

The subject properties are located within Lee County Utilities Future Service Area as depicted on Maps 4A and 4B of the Lee County Comprehensive Land Use Plan. Potable water and sanitary sewer lines are in operation adjacent to the property mentioned above. However, in order to provide service to the subject parcels, developer funded system enhancements such as line extensions may be required.

Your firm has indicated that this project will consist of 391 multi-family residential units with an estimated flow demand of approximately 97,750 gallons per day. Lee County Utilities presently has sufficient capacity to provide potable water and sanitary sewer service as estimated above.

Availability of potable water and sanitary sewer service is contingent upon final acceptance of the infrastructure to be constructed by the developer. Upon completion and final acceptance of this project, potable water service will be provided through our Green Meadows Water Treatment Plant.

Sanitary sewer service will be provided by our Fiesta Village Water Reclamation Facility. The Lee County Utilities' Design Manual requires the project engineer to perform hydraulic computations to determine what impact this project will have on our existing system.

There are no reuse mains in the vicinity of these parcels.

Prior to beginning design work on this project, please meet with LCU Staff to determine the best point of connection and discuss requirements for construction.

December 6, 2023

Page 2

This letter should not be construed as a commitment to serve, but only as to the availability of service. Lee County Utilities will commit to serve only upon receipt of all appropriate connection fees, a signed request for service and/or an executed service agreement, and the approval of all State and local regulatory agencies.

Further, this letter of availability of potable water and sanitary sewer service is to be utilized for Due Diligence only. Individual letters of availability will be required for the purpose of obtaining building permits.

Sincerely,

**LEE COUNTY UTILITIES**

*Ashanti Shahriyar*

Ashanti Shahriyar

Plan Reviewer

239-533-8531

UTILITIES ENGINEERING



Lee County  
Southwest Florida

LEE COUNTY UTILITIES  
REQUEST FOR LETTERS OF AVAILABILITY

DATE: NOVEMBER 30, 2023

To: DCAP STAFF  
[Lcudcap@leegov.com](mailto:Lcudcap@leegov.com)

FROM: FRED DROVDLIC, AICP

FIRM: RVI PLANNING AND LANDSCAPE ARCHITECTURE

ADDRESS: 1514 BROADWAY, SUITE 201

ADDRESS: FORT MYERS, FL 33901 -

PHONE#: (239)318-6707 FAX: ( ) -

E-MAIL ADDRESS: [FDROVDLIC@RVIPLANNING.COM](mailto:FDROVDLIC@RVIPLANNING.COM)

PROJECT NAME: CHIEF COURT INDUSTRIAL REZONING

PREVIOUS PROJECT NAME(S): ROYAL PALM VILLAGES MOBILE HOME PARK

STRAP NUMBER(S): 35-45-24-L2-05000.01CE PLUS SEE ATTACHED LIST

PRIOR STRAP NUMBER(S) (IF ANY):

LOCATION/SITE ADDRESS: 15180 MEADOW CIRCLE, FORT MYERS, FL 33908

PURPOSE OF LETTER:

- DEVELOPMENT ORDER SUBMITTAL  FINANCING  EFFLUENT REUSE
- PERMITTING OF SURFACE WATER MANAGEMENT (SOUTH FLORIDA WATER MANAGEMENT DISTRICT)
- OTHER: (PLEASE SPECIFY)

RESIDENTIAL PLANNED DEVELOPMENT AND COMPREHENSIVE PLAN MAP AMENDMENT

PLANNED USE:

- COMMERCIAL  INDUSTRIAL  RESIDENTIAL - ( SINGLE-FAMILY  MULTI-FAMILY)
- OTHER: (PLEASE SPECIFY) \_\_\_\_\_

PLANNED # OF COMMERCIAL/INDUSTRIAL BUILDINGS: 4 TOTAL SQUARE FOOTAGE: \_\_\_\_\_

RESIDENTIAL UNITS: SINGLE-FAMILY: \_\_\_\_\_ MULTI-FAMILY: 391

AVERAGE ESTIMATED DAILY FLOW (GPD): 97,750 ( WATER  WASTE-WATER) (GPD): \_\_\_\_\_  REUSE

PLEASE SHOW CALCULATION USED TO DETERMINE AVERAGE ESTIMATED DAILY FLOW (GPD) PER CRITERIA SET FORTH IN LEE COUNTY UTILITIES DESIGN MANUAL: \_\_\_\_\_

CHAPTER 64E-6 OF THE FLORIDA ADMINISTRATIVE CODE GUIDELINES

Multi-family residential at 250 GPD per unit = 97,750 GPD

Please e-mail the completed form to [Lcudcap@leegov.com](mailto:Lcudcap@leegov.com).

If you should have any questions or require assistance, please feel free to call our office at (239) 533-8531.





November 10, 2023

Pamela Keyes  
Lee County Utilities  
7391 College Parkway  
Fort Myers, FL 33907

**RE: Flournoy – Comprehensive Plan Amendment  
Letter of Service Availability**

Dear Ms. Keyes,

RVI Planning + Landscape Architecture, on behalf of the applicant and contract purchaser of the subject property, the Flournoy Development Group, is preparing a Comprehensive Plan Amendment application for the above referenced project. The property consists of 1 parcel totaling 19.33+/- acres located on the southwest corner of Old Gladius Road and US Highway 41 in unincorporated Lee County, Florida. An aerial location map depicting the subject property has been attached for your reference.

The Applicant is proposing Large-Scale Comprehensive Plan Map amendment to change the Future Land Use designation of the property from "Central Urban" to "Intensive Development" and designate the Property in the Lee County Utilities (LCU) services area to connect to centralized potable water and sanitary sewer services. The request is to allow for a maximum of 391 multifamily dwelling units.

**The proposed population at build out is estimated at 1,009 people (maximum of 391 dwelling units X 2.58 persons per dwelling unit).** Buildout is anticipated to occur by 2030; however, this date is variable depending upon market demand.

To complete the application process, we are required to secure a service availability letter from your agency stating whether existing facilities are capable of serving this future project. I greatly appreciate your time and consideration of this matter.

If you have any further questions, please do not hesitate to contact me directly at (239) 318-6707 or [fdrovdlic@rviplanning.com](mailto:fdrovdlic@rviplanning.com).

Sincerely,  
**RVI** Planning + Landscape Architecture

A handwritten signature in blue ink, appearing to read 'Fred Drovdlc'.

**Fred Drovdlc, AICP**

Enclosure



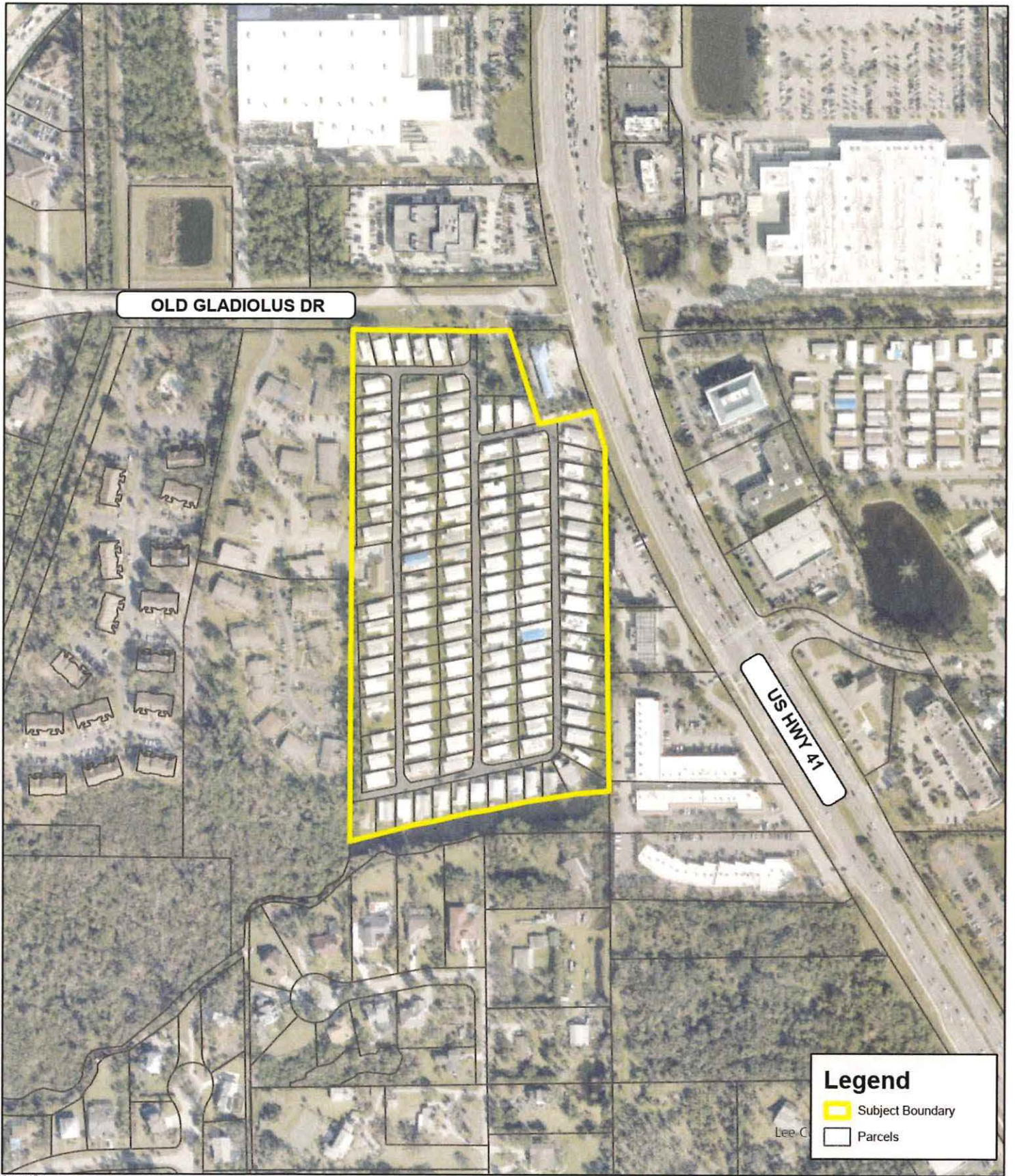


## FLOURNEY MULTIFAMILY RPD

### List of Lots

STRAP #'s of the terminated lots of Royal Palms Village Mobile Home Park

35-45-24-05-00000.0010	35-45-24-05-00000.0430	35-45-24-05-00000.0840	35-45-24-05-00000.1290
35-45-24-05-00000.0020	35-45-24-05-00000.0440	35-45-24-05-00000.0850	35-45-24-05-00000.1300
35-45-24-05-00000.0030	35-45-24-05-00000.0450	35-45-24-05-00000.0860	35-45-24-05-00000.1310
35-45-24-05-00000.0040	35-45-24-05-00000.0460	35-45-24-05-00000.0870	35-45-24-05-00000.1320
35-45-24-05-00000.0050	35-45-24-05-00000.0470	35-45-24-05-00000.0880	35-45-24-05-00000.1330
35-45-24-05-00000.0060	35-45-24-05-00000.0480	35-45-24-05-00000.0890	35-45-24-L2-05000.01CE
35-45-24-05-00000.0070	35-45-24-05-00000.0490	35-45-24-05-00000.0900	35-45-24-L2-05000.02CE
35-45-24-05-00000.0080	35-45-24-05-00000.0500	35-45-24-05-00000.0910	35-45-24-L2-05000.03CE
35-45-24-05-00000.0090	35-45-24-05-00000.0510	35-45-24-05-00000.0920	35-45-24-L2-0500R.00CE
35-45-24-05-00000.0100	35-45-24-05-00000.0520	35-45-24-05-00000.0930	35-45-24-05-00000.0410
35-45-24-05-00000.0110	35-45-24-05-00000.0530	35-45-24-05-00000.0940	35-45-24-05-00000.0420
35-45-24-05-00000.0120	35-45-24-05-00000.0540	35-45-24-05-00000.0950	35-45-24-05-00000.0820
35-45-24-05-00000.0130	35-45-24-05-00000.0550	35-45-24-05-00000.0960	35-45-24-05-00000.0830
35-45-24-05-00000.0140	35-45-24-05-00000.0560	35-45-24-05-00000.0970	35-45-24-05-00000.1230
35-45-24-05-00000.0150	35-45-24-05-00000.0570	35-45-24-05-00000.0980	35-45-24-05-00000.1240
35-45-24-05-00000.0160	35-45-24-05-00000.0580	35-45-24-05-00000.0990	35-45-24-05-00000.1250
35-45-24-05-00000.0170	35-45-24-05-00000.0590	35-45-24-05-00000.1000	35-45-24-05-00000.1260
35-45-24-05-00000.0180	35-45-24-05-00000.0600	35-45-24-05-00000.1010	35-45-24-05-00000.1270
35-45-24-05-00000.0190	35-45-24-05-00000.0610	35-45-24-05-00000.1020	35-45-24-05-00000.1280
35-45-24-05-00000.0200	35-45-24-05-00000.0620	35-45-24-05-00000.1030	
35-45-24-05-00000.0210	35-45-24-05-00000.0630	35-45-24-05-00000.1040	
35-45-24-05-00000.0220	35-45-24-05-00000.0640	35-45-24-05-00000.1050	
35-45-24-05-00000.0230	35-45-24-05-00000.0650	35-45-24-05-00000.1060	
35-45-24-05-00000.0240	35-45-24-05-00000.0660	35-45-24-05-00000.1070	
35-45-24-05-00000.0250	35-45-24-05-00000.0670	35-45-24-05-00000.1080	
35-45-24-05-00000.0260	35-45-24-05-00000.0680	35-45-24-05-00000.1090	
35-45-24-05-00000.0270	35-45-24-05-00000.0690	35-45-24-05-00000.1100	
35-45-24-05-00000.0280	35-45-24-05-00000.0700	35-45-24-05-00000.1110	
35-45-24-05-00000.0290	35-45-24-05-00000.0710	35-45-24-05-00000.1120	
35-45-24-05-00000.0300	35-45-24-05-00000.0720	35-45-24-05-00000.1130	
35-45-24-05-00000.0310	35-45-24-05-00000.0730	35-45-24-05-00000.1140	
35-45-24-05-00000.0320	35-45-24-05-00000.0740	35-45-24-05-00000.1150	
35-45-24-05-00000.0330	35-45-24-05-00000.0750	35-45-24-05-00000.1160	
35-45-24-05-00000.0340	35-45-24-05-00000.0760	35-45-24-05-00000.1170	
35-45-24-05-00000.0350	35-45-24-05-00000.0770	35-45-24-05-00000.1180	
35-45-24-05-00000.0370	35-45-24-05-00000.0780	35-45-24-05-00000.1190	
35-45-24-05-00000.0380	35-45-24-05-00000.0790	35-45-24-05-00000.1200	
35-45-24-05-00000.0390	35-45-24-05-00000.0800	35-45-24-05-00000.1210	
35-45-24-05-00000.0400	35-45-24-05-00000.0810	35-45-24-05-00000.1220	



**FLOURNOY MULTIFAMILY RPD • AERIAL MAP**

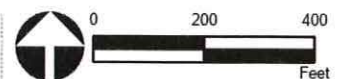
📍 Lee County, FL

📅 11/1/2023

# 23001957

👤 Flournoy Development Group

28100 Bonita Grande Drive  
 Suite 305  
 Bonita Springs, FL 34135  
 Tel: 239.405.7777  
 www.rviplanning.com



Information furnished regarding this property is from sources deemed reliable. RVi has not made an independent investigation of these sources and no warranty is made as to their accuracy or completeness. This plan is conceptual, subject to change, and does not represent any regulatory approval.



# Royal Palm Multifamily CPA

## Exhibit M18 – State Policy Plan and Regional Policy Plan

### I. STATE COMPREHENSIVE PLAN

Although the Community Planning Act of 2011 eliminated the requirement for consistency of the local comprehensive plan with the state comprehensive plan, the following analysis is included for further justification of the request. The plan amendment is consistent and furthers the adopted State Comprehensive Plan. Relevant portions are discussed below.

**187.201(6) PUBLIC SAFETY.—**

**(a) Goal.—Florida shall protect the public by preventing, discouraging, and punishing criminal behavior, lowering the highway death rate, and protecting lives and property from natural and manmade disasters.**

**(b) Policies:**

**9. Increase crime prevention efforts to enhance the protection of individual personal safety and property.**

CONSISTENCY: The Lee County Sheriff’s Office has provided a letter of service availability for this site.

**(b) Policies:**

**22. Require local governments, in cooperation with regional and state agencies, to prepare advance plans for the safe evacuation of coastal residents.**

**23. Require local governments, in cooperation with regional and state agencies, to adopt plans and policies to protect public and private property and human lives from the effects of natural disasters.**

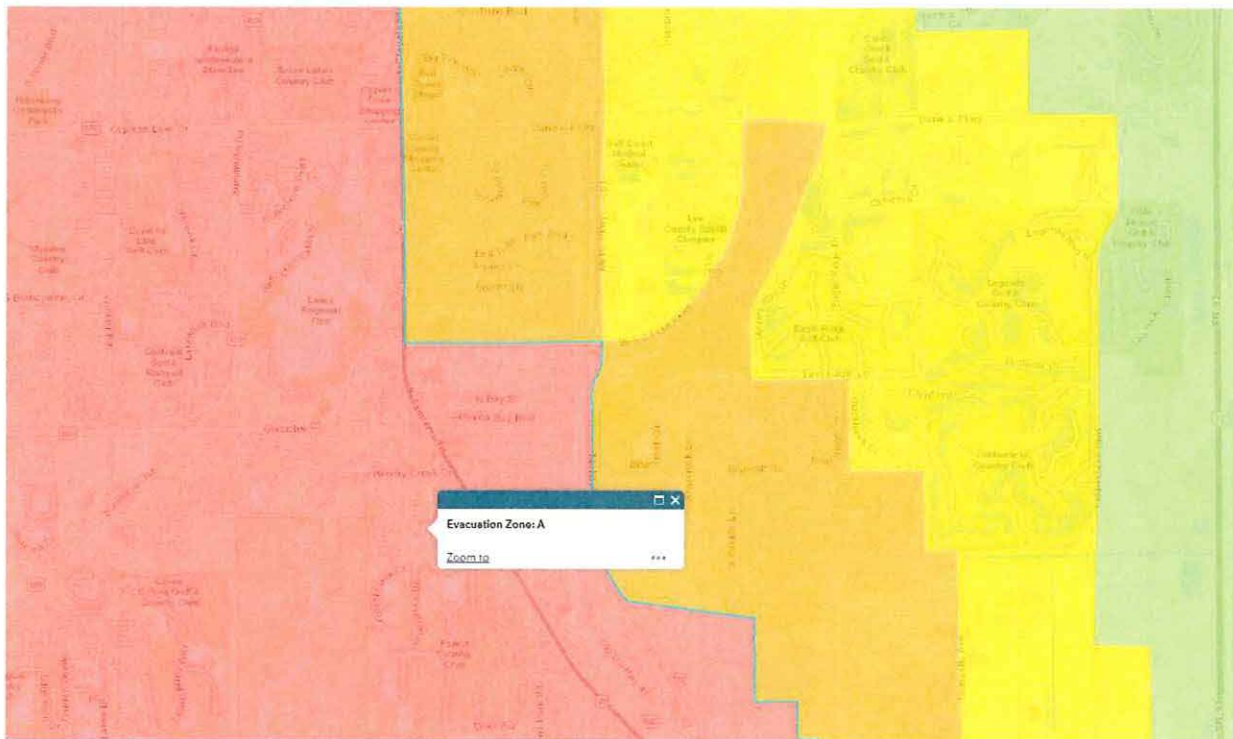
CONSISTENCY: The map amendment from Central Urban to Intensive Development increases potential density or allowance for population to occupy the parcel and need to evacuate during a natural disaster.

CURRENT FUTURE LAND USE	Acreage	Density	Residential Units
Central Urban	19.33 less 1.16 natural waterways = 18.17+/- developable	10 du/acre (base) 4du/acre (bonus)	182 (base) 91 (bonus) <b>= 273 du</b>
PROPOSED FUTURE LAND USE	Acreage	Density	Residential Units
Intensive Development	19.33 less 1.16 natural waterways = 18.17+/- developable	14 du/acre (base) 8 du/acre (bonus)	255 (base) 145 (bonus) <b>= 400 du</b>

The Lee County Emergency Management department will need to account for the potential population increase. Currently the and likeliness of a natural disaster is assigned to Evacuation Zone A. According to the LCEM plan, Zone A is a vulnerable Evacuation Zone. Well prepared and

protected buildings should be safe in most events. However, if evacuations are required, the safest option may be to travel to the east coast. The site will have direct access to Old Gladius Road and US Highway 41. Access to these major arterial roadways can allow for effective evacuation. The site is also within 2.3 miles of South Fort Myers High School which is a public shelter site.

*JR Evans has prepared a risk evacuation analysis report, attached as Exhibit M12 - Risk Evac Analysis\_Comp 01.30.2024, to demonstrate safe evacuation given the potentially increased population density.*



**187.201(7) WATER RESOURCES.—**

**(a) Goal.—***Florida shall assure the availability of an adequate supply of water for all competing uses deemed reasonable and beneficial and shall maintain the functions of natural systems and the overall present level of surface and ground water quality. Florida shall improve and restore the quality of waters not presently meeting water quality standards.*

**(b) Policies:**

**5. Ensure that new development is compatible with existing local and regional water supplies.**

CONSISTENCY: Lee County Utilities has issued a letter of utility service availability for the site.

**10. Protect surface and groundwater quality and quantity in the state.**

CONSISTENCY: The site is undergoing a planned development zoning, a custom zoning district that will be required to meet the Land Development Code regulations for Lee County, and additionally may be conditioned by the County to ensure consistency with all groundwater quality and quantity

requirements. Moreover, in order for development to occur an Environmental Resource Permit will have to be attained from the State of Florida which will enforce the requirements to protect surface and ground water.

**187.201(9) NATURAL SYSTEMS AND RECREATIONAL LANDS.—**

**(a) Goal.—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.**

**(b) Policies:**

- 1. Conserve forests, wetlands, fish, marine life, and wildlife to maintain their environmental, economic, aesthetic, and recreational values.**
- 3. Prohibit the destruction of endangered species and protect their habitats.**
- 4. Establish an integrated regulatory program to assure the survival of endangered and threatened species within the state.**

CONSISTENCY: Lee County requires a Protected species Survey and mitigation if endangered or protected species are found. Lee County's requirements are consistent with State programs and requirements. The Southwest Florida Water Management District (SFWMD) monitors the protection of wetlands and similar environmentally sensitive site.

**187.201(12) HAZARDOUS AND NONHAZARDOUS MATERIALS AND WASTE.—**

**(a) Goal.—All solid waste, including hazardous waste, wastewater, and all hazardous materials, shall be properly managed, and the use of landfills shall be eventually eliminated.**

**(b) Policies:**

- 2. By 1994, provide in all counties a countywide solid waste collection system to discourage littering and the illegal dumping of solid waste.**

CONSISTENCY: Lee County Solid Waste has provided a letter of service availability to dispose of all solid waste on site and Lee County has an incineration plant to minimize landfill contributions.

**187.201(14) PROPERTY RIGHTS.—**

**(a) Goal.—Florida shall protect private property rights and recognize the existence of legitimate and often competing public and private interests in land use regulations and other government action.**

**(b) Policies:**

- 1. Provide compensation, or other appropriate relief as provided by law, to a landowner for any governmental action that is determined to be an unreasonable exercise of the state's police power so as to constitute a taking.**
- 2. Determine compensation or other relief by judicial proceeding rather than by administrative proceeding.**
- 3. Encourage acquisition of lands by state or local government in cases where regulation will severely limit practical use of real property.**

CONSISTENCY: The site is under private contracts and not negatively affected by State or local policy or land use regulations that would constitute compensation.

**(15) LAND USE.—**

**(a) Goal.—***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.*

**(b) Policies:**

**1.** *Promote state programs, investments, and development and redevelopment activities which encourage efficient development and occur in areas which will have the capacity to service new population and commerce.*

**2.** *Develop a system of incentives and disincentives which encourages a separation of urban and rural land uses while protecting water supplies, resource development, and fish and wildlife habitats.*

CONSISTENCY: The development area is an urban environment with current intense allowances for development that are appropriate as the site is serviced by or has commitments from all applicable urban services agencies such as EMS, Police, Fire, Transit, Utilities, Schools, Solid Waste and Parks. Additionally, the site will have access to major roadways with adequate carrying capacity when the current plans for US Highway 41.

**(17) PUBLIC FACILITIES.—**

**(a) Goal.—***Florida shall protect the substantial investments in public facilities that already exist and shall plan for and finance new facilities to serve residents in a timely, orderly, and efficient manner.*

**(b) Policies:**

**1.** *Provide incentives for developing land in a way that maximizes the uses of existing public facilities.*

**2.** *Promote rehabilitation and reuse of existing facilities, structures, and buildings as an alternative to new construction.*

**3.** *Allocate the costs of new public facilities on the basis of the benefits received by existing and future residents.*

CONSISTENCY: The site is considered an urban site as it has been in the Central Urban future land use category. The change to Intensive Development is a reflection of the proper placement of population and affordable housing near major commercial employment centers that are serviced by all means if urban services.



# Royal Palm Multifamily CPA

## Exhibit M19 – Justification of Proposed Amendment

### I. REQUEST

The contract purchaser for the 19.33+/- acre subject property, Meyers Group, LLC (“Applicant”), is requesting a Comprehensive Plan Amendment for one change to Lee County’s Comprehensive Plan:

1. Amend Map 1-A – Future Land Use – from Central Urban to the Intensive Development Future Land Use Category (FLUC).

### II. FLUC CHANGE JUSTIFICATION

The request is to increase the potential density by moving the property into the Intensive Development FLUC which allows the property which allows density to be calculated over the residential areas. The increased potential density is justified by the following analysis.

#### *Central Location*

In the captured image of the Lee County Future Land Use Map the subject property is marked with a yellow star. The significance of this regional view is to show the central location and significance of the US 41 and Gladius Drive / 6 Mile Cypress Parkway intersection. The interchange is located in the southeast corner of the South Fort Myers Planning District. The area is built out with retail centers, fast food restaurants, a car dealership, Department stores, and home improvement stores. The Property is located within the southwest corridor of the US 41 and Gladius Drive / 6 Mile Cypress Parkway intersection. US 41 is a major arterial roadway that travels north-south in Lee County and serves as a major connection to all of the east-west arterials such as Daniels Parkway, Colonial Boulevard, Estero Parkway, 6 Mile Cypress Parkway, etc.

The applicant feels the consideration of bonus density in this area is good planning. The former mobile home flooded 2-3 feet in Hurricane Ian. Since that time the Flournoy Group and the Royal Palm Village POA have successfully terminated the 132 individual lots making way for redevelopment. It is telling that this was able to be accomplished. A CHHA is not an appropriate location for mobile homes, particularly on older parcels that are not raised to current base flood elevations. Repeated flood risks prompted the corporation of the termination.

#### *Infill*

The road is largely developed along US 41. The subject property is located in the southwest quadrant of US 41 and Gladius Parkway. The area is predominantly developed along US 41 to the north and south roadway. North of the Property includes a car dealership and a Lowes Improvement Center. To the east includes various of retail stores such as Wal-Mart and Home Depot, offices, and commercial retail and service plazas. South of the property includes a single-family residential development. However, directly west of the property includes multifamily apartments. The overall area is largely built out with a mix of commercial and residential developments.

The site is in the middle of a major employment area, abutted by multifamily developments, acts as an appropriate transition from commercial activity on US 41 to lower densities, has access to two major arterials (with proposed new access to US 41), is within one mile of Lakes Park, has access to Lee Tran with ¼ mile of a bus stop, is serviced by all major urban services as confirmed by the letters of availability for the Lee Plan map amendment letters received. The site is perfect for higher density infill redevelopment, particularly when considering the structures will be built to modern codes and FEMA flood elevations.

### *Serves Residential Rooftops*

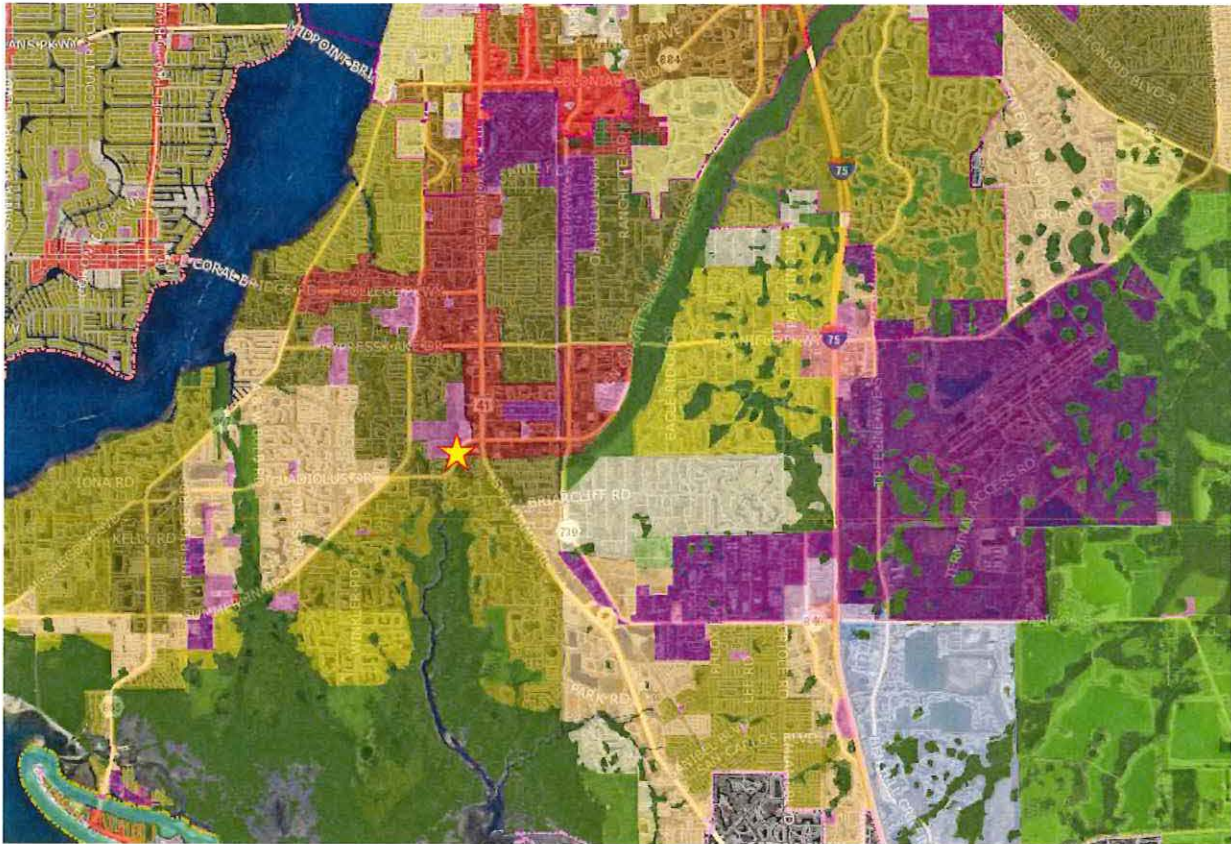
The site sits central to a region that has been developed with surrounding single-family and multifamily dwelling units.

### *Infrastructure*

The Property has access to the necessary utilities to service the project and all urban services are adequate to serve the proposed development.

- Letters of availability have been secured from Lee County Utilities for water and sanitary sewer.
- Roadways have adequate capacity as the site, as proposed, will have direct access onto US 41, a state maintained principal arterial, and secondary access to Gladiolus Drive, a Lee County maintained arterial via Old Gladiolus Drive Lee County local road.
- Lee Tran serves the South Fort Myers Area by via Route 140 (Merchants Crossing/Bell Tower) and Route 240 (Coconut Point Mall/Bell Tower) located at the car wash directly adjacent to the property (approximately less than 200 ft.) on both the northbound and southbound travel lanes along the US Highway 41 roadway.
- The US 41 proposed access provides connection to the shared use path on the west side of US 41.
- The site is entrance onto Old Gladiolus Drive is within ¼ mile of the shared path on Gladiolus Drive and the Lakes Park regional Lee County Park.
- South Trail Fire Station #63 is within one mile of the site north on US 41 to Harper Road.
- The Lee County Sheriff's South District primary substation is within one mile as is an EMS substation on Six Mile Cypress Parkway.





### *Impacts of the Request*

The impacts of the requested amendments are compared to the existing by-right entitlements per the future land use designations. The density under the Central Urban future land use category allows up to 15 units per acre with bonus density. The density under the proposed Intensive Development future land use category allows for up to 14 units per acre with base density at 8 units per acre for a total of 22 units per acre.

The uses between the two land use categories both allow for intense uses. The Central Urban FLUC encourages uses mixed use developments and best serves as an urban core. Thus, these areas are already the most heavily settled and have the greatest range and highest levels of public with a broad range of land uses that include residential, commercial, public and quasi-public, and limited light industrial land uses. The Intensive Development FLUC is also to be located along major arterial roads (Us 41) and similarly the available and potential levels of public services in both these areas are suited to accommodate high densities and intensities. However, in the Intensive Development category mixed use developments of high-density residential, commercial, limited light industrial, and office uses are encouraged.

Overall, the two land use categories, given the location, have very similar intended permitted uses and allowances for similar intensities. The primary difference in the request does not lie in the permitted uses but in the request for increased dwelling units under the Intensive Development FLUC. This will allow for more population to be located within the project many of which will be for affordable housing units as required in the CHHA.

<b>CURRENT FUTURE LAND USE</b>	<b>Acreage</b>	<b>Density</b>	<b>Residential Units</b>
<b>Central Urban</b>	19.33 less 1.16 natural waterways = 18.17+/- developable	10 du/acre (base) 4du/acre (bonus)	182 (base) 91 (bonus) <b>= 273 du</b>
<b>PROPOSED FUTURE LAND USE</b>	<b>Acreage</b>	<b>Density</b>	<b>Residential Units</b>
<b>Intensive Development</b>	19.33 less 1.16 natural waterways = 18.17+/- developable	14 du/acre (base) 8 du/acre (bonus)	255 (base) 145 (bonus) <b>= 400 du</b>

*Conclusion*

Intense development is good in the correct location. The Intensive Development FLUC is located north of the Property and will allow for the expansion of FLU as well as similar residential density upon request. The move to Intensive Development will allow for vertical density and will allow for increase bonus density, which is limited to affordable multi-family housing, to be integrated into the surrounding commercial services.