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July 3, 2024

Joseph Sarracino, Planner, Planning Section  
Lee County Division of Community Development  
1500 Monroe Street  
Fort Myers, Florida 33901

RE: **CPA2024-00005 Florida Gulf Coast Business Center**

Dear Mr. Sarracino,

Please find attached a set of revised plans for the above-mentioned project per your comments dated May 1, 2024. Below are written responses to the comments.

#### **APPLICATION MATERIALS COMMENTS**

1. Update the State Review Process section of the application to indicate that this amendment will be an Expedited State Review.

**Response: Please see the attached revised application**

2. Update part 4a of page 1 of the application to indicate that the proposed amendment impacts Airport Noise Zones [Map 1-E].

**Response: Please see the attached revised application**

3. Include the number of the Lee Plan Policy amendment that is subject to the proposed change on Exhibit- 4.

**Response: Please see the revised Exhibit T-4 to include the number as well as the Goal**

4. Separate the Lee Plan analysis from Exhibit-TS into a separate Exhibit-T6.

**Response: Please see the Lee Plan Analysis T-6 that has been separated from T-5**

#### **REGIONAL POLICY PLAN COMMENTS**

5. Describe how the proposal affects adjacent local governments and their comprehensive plans in Exhibit-T5.

**Response: Please see revised exhibit t-5**

6. Provide analysis of applicable State and Regional Policy Plans that will be affected by the proposed amendment. State Policy Plan analysis should be Exhibit-T9, and Regional Plan analysis should be Exhibit-T10.

**Response: Please see exhibit T9 + T10**

## **HISTORIC RESOURCES COMMENTS**

7. Provide an overall analysis of potential historic impacts (positive and negative) as Exhibit-T8.

**Response: Please see exhibit T8**

## **PLANNING COMMENTS**

8. Analyze Lee Plan Policy 1.6.1, Objective 2.5, applicable policies of Goal 6 (as amended by Ordinance 23-08), applicable policies of Goal 7 (as amended by Ordinance 23-08), Policy 36.1.4, and Objective 39.6 as it relates to Map 4-E.

**Response: Please see revised exhibit T5**

9. Objective 2.4 of the Lee Plan analysis is numbered incorrectly. Label as Objective 2.3.

**Response: Please see revised exhibit T5**

10. Analysis of Policy 158.3.5 is based on outdated Lee Plan Language. Update analysis to include all relevant Goals, Objectives, and Policies of the Economic Element as amended by Ordinance 23-08.

**Response: Please see revised exhibit T5**

## **TRANSPORTATION COMMENTS**

11. Table 10 requires revision. Specifically, provide clarification on how the data displayed in the "Total External Trip" row of Table 10 was calculated and its source.

**Response: Please see the revised TIS**

12. Include the calculation for the Internal Capture Rate used in Tables 3, 5, 8, and 10 of the Traffic Impact Study.

**Response: Please see the attached TIS**

## **ENVIRONMENTAL COMMENTS**

13. Provide an overall analysis of potential environmental impacts (positive and negative) as Exhibit-T7

**Response: Please see exhibit T7**

If you have any questions regarding the above responses or any of the attachments, please contact our office at (239) 936-5222.

Sincerely,  
Quattrone & Associates, Inc.

Sharon Hrabak  
Permitting Manager  
Email: [Sharon@gainc.net](mailto:Sharon@gainc.net)  
Attachments:



CPA2024-00005  
**APPLICATION FOR A COMPREHENSIVE  
PLAN AMENDMENT - TEXT**

**Project Name:** Florida Gulf Coast Business Center

**Project Description** Amend Policy 1.3.4, The Industrial Commercial Interchange

**State Review Process:** ☐ State Coordinated Review ☒ Expedited State Review ☐ Small-Scale Text\*

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

**APPLICANT – PLEASE NOTE:**

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

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

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

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

**1. Name of Applicant:** Alan C Freeman

City, State, Zip: 28120 Hunters Ridge Blvd. Ste.5, Bonita Springs, FL 34135

Phone Number: 239-267-8888

E-mail: \_\_\_\_\_

**2. Name of Contact:** Al Quattrone & Associates, Inc

Address: 4301 Veronica Shoemaker Blvd

City, State, Zip: Fort Myers, FL 33916

Phone Number: 239-936-5222

E-mail: permits@qainc.net

**3. Property Information:** Provide an analysis of any property within Unincorporated Lee County that may be impacted by the proposed text amendment. This amendment would only apply to the subject property because the other properties located within the Industrial Commercial Interchange designated prior to January 1, 2007

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

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

☐ Public Acquisition  
[Map 1-D]

☐ Agricultural Overlay  
[Map 1-G]

☐ Airport Mitigation Lands  
[Map 1-D]

☒ Airport Noise Zones  
[Map 1-E]

☐ Southeast Lee County Residential  
Overlay [Map 2-D]

☐ Mixed Use Overlay  
[Map 1-C]

☐ Community Planning Areas  
[Map 2-A]

☐ Urban Reserve [Map 1-D]

☐ Water-Dependent Overlay  
[Map 1-H]

☐ Private Recreational Facilities  
Overlay [Map 1-F]



**4b. Planning Communities/Community Plan Area Requirements**

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

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

**Public Facilities Impacts**

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

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

2. **Provide an existing and future conditions analysis for the following (see Policy 95.1.3):**

- Sanitary Sewer
- Potable Water
- Surface Water/Drainage Basins
- Parks, Recreation, and Open Space
- Public Schools

**Environmental Impacts**

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

**Historic Resources Impacts**

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

**Internal Consistency with the Lee Plan**

- Discuss how the proposal affects established Lee County population projections, Lee Plan Table 1(b) and the total population capacity of the Lee Plan Future Land Use Map.
- List all goals and objectives of the Lee Plan that are affected by the proposed amendment. This analysis should include an evaluation of all relevant policies under each goal and objective.
- Describe how the proposal affects adjacent local governments and their comprehensive plans.
- List State Policy Plan goals and policies, and Strategic Regional Policy Plan goals, strategies, actions and policies which are relevant to this plan amendment.

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

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

**SUBMITTAL REQUIREMENTS**

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

**MINIMUM SUBMITTAL ITEMS**

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



Exhibit T-4  
Proposed Text Change

GOAL 1: FUTURE LAND USE MAP. To maintain and enforce a Future Land Use Map showing the proposed distribution, location, and extent of future land uses by type, density, and intensity in order to protect natural and man-made resources, provide essential services in a cost-effective manner, and discourage urban sprawl. (Ord. No. 94-30)

OBJECTIVE 1.3: INTERSTATE HIGHWAY INTERCHANGE AREAS. Special areas adjacent to the interchanges of Interstate 75 that maximize critical access points will be designated on the Future Land Use Map. Development in these areas must minimize adverse traffic impacts and provide appropriate buffers, visual amenities, and safety measures. Each interchange area is designated for a specific primary role: General, General Commercial, Industrial Commercial, Industrial, and University Village. Residential uses are only permitted in these categories in accordance with Policy 1.3.2. (Ord. No. 94-30, 99-18, 00-22, 16-02, 17-13, 18-05)

POLICY 1.3.4: The Industrial Commercial Interchange areas are designated to permit a mixture of light industrial and/or commercial uses. This category does not permit heavy industrial uses. Within areas expanded beyond the existing Industrial Commercial Interchange boundaries (on January 1, 2007), retail commercial uses will be limited to 20% of the total floor area and light industrial uses will be a minimum of 50% of the total floor area. (Ord. No. 07-10)



## Florida Gulf Coast Business Center

### Existing and Future Public Facilities Impacts Analysis T-5

In accordance with **Policy 95.1.3** the following is a description of the impact that the proposed change will have on public services. This analysis is based on a comparison of the existing approved zoning intensity on the property with the proposed zoning intensity.

#### Potable Water and Sanitary Sewer

The site is located within the Lee County Utilities service area. We understand LCU has capacity to serve the project. Currently the subject parcel is located within the future water and sewer franchise areas depicted on the Lee Plan Maps 4-A and 4-B.

We anticipate that the text amendment will intensify the development potential of the property by increasing the permissible amount of commercial but overall will not result in an increase in total permissible square footage of development. Currently the FLUM is Industrial Commercial Interchange:

Residential Units/Density:	0.0 not permitted in Industrial Commercial Interchange.
Commercial Intensity:	405,000 SF Commercial Office. 20,000 SF Commercial Retail 200 Hotel Units
Industrial Intensity:	448,001 sf

The maximum allowable development under proposed text amendment:

Residential Units/Density:	0.0 no change.
Commercial Intensity:	249,000 SF Commercial Office. 142,000 SF Commercial Retail 200 Hotel Units
Industrial Intensity:	505,000 sf

Based on these calculations the total expected water and wastewater treatment volumes will be approximately 39,3000 gpd

The property falls into the Lee County Utilities potable water and sanitary sewer future service areas. LCU will have the capacity to service the project according to the 2022 concurrency report. Potable Water required capacity average is 250 gpd and the available capacity is 319 gpd. Sanitary Sewer required capacity is 200 gpd (per dwelling unit) with an available capacity of 226 gpd per ERC



#### **Surface Water/Drainage Basins**

Drainage has been determined and established by the Florida Gulf Coast Business Center permit # 36-102317-P. The Basin on which the property is located is the Coastal Ecosystem Watershed of SFWMD in the Six Mile Slough drainage basin.

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

With no increase in population the proposed text amendment will not impact Community or Regional Parks needs.

#### **Community Parks**

Three Oaks Community Park is located  $\pm 2.0$  miles south of the site. On-Site open space will be required as per the LDC. Recreational amenities may be incorporated into the site, as provided by employers or auxiliary commercial development in the form of health and exercise. Scotlynn Logistic Services that has provided basketball courts and walking paths that is located within this FLUM.

#### **Public Schools**

With no increase in population the proposed text amendment will not impact the school district. No additional classrooms will be required.

#### **Adjacent Local Government and its Comprehensive Plan**

The subject parcel is located within the unincorporated portion of Lee County



MEMORANDUM

TO: Mr. Alan Freeman

FROM: Ted B. Treesh  
President

DATE: REVISED June 3, 2024

RE: Florida Gulf Coast Business Center  
Lee County, Florida

TR Transportation Consultants, Inc. has completed a trip generation comparison based on the request to modify the land use intensities of the Florida Gulf Coast Mixed Use Planned Development, located on Three Oaks Parkway north of Alico Road in Lee County, Florida. The development parameters of this site are outlined in the approved Administrative Amendment 2020-00139 and include the development of up to 873,001 total square feet, which may include up to 448,001 square feet of industrial uses, 405,000 square feet of commercial office uses (of which a maximum of 180,000 square feet could be Medical Office), 20,000 square feet of commercial retail uses and a maximum of 200 hotel rooms.

The trip generation was completed based on the Institute of Transportation Engineer's (ITE) Report titled ***Trip Generation Report***, 11<sup>th</sup> Edition. Also consistent with the traffic study conducted as part of the original rezoning application, the trip generation was reduced based on internal capture of trips between the retail and commercial office uses as well as due to "pass-by" trips for the retail uses. **Tables 1 through 5** below illustrate the trip generation calculation of the project as currently approved based on the ITE Trip Generation report and trip reductions. The hotel use was not analyzed as part of the rezoning application TIS and is not considered in this analysis.

**Table 1**  
**Approved Land Uses**  
**Florida Gulf Coast Business Center**

Land Use	Size
Industrial Park (LUC 130)	448,001 square feet
Strip Retail Plaza (LUC 822)	20,000 square feet
General Office Building (LUC 710)	225,000 square feet
Medical Office Building (LUC 720)	180,000 square feet
<b>TOTAL DEVELOPMENT</b>	<b>873,001 square feet</b>

**Table 2**  
**Approved Trip Generation**  
**Florida Gulf Coast Business Center**

Land Use	A.M. Peak Hour			P.M. Peak Hour			Daily (2-way)
	In	Out	Total	In	Out	Total	
Industrial Park (448,001 square feet)	123	29	152	34	118	152	2,048
Strip Retail Plaza (20,000 square feet)	27	18	45	64	63	127	1,074
General Office (225,000 square feet)	296	40	336	55	271	326	2,350
Medical Office (180,000 square feet)	323	86	409	219	510	729	7,627
<b>Total Trips</b>	<b>769</b>	<b>173</b>	<b>942</b>	<b>372</b>	<b>962</b>	<b>1,334</b>	<b>13,099</b>

ITE Trip Generation Report, 11<sup>th</sup> Edition

**Table 3**  
**Approved External Trip Generation**  
**Florida Gulf Coast Business Center**

Land Use	Weekday A.M. Peak Hour			Weekday P.M. Peak Hour			Daily (2-way)
	In	Out	Total	In	Out	Total	
Total Trips	769	173	942	372	962	1,334	13,099
Less 3.0%/1% Internal Capture	-14	-14	-28	-6	-6	-12	-393
<b>Total External Trips</b>	<b>755</b>	<b>159</b>	<b>914</b>	<b>366</b>	<b>956</b>	<b>1,322</b>	<b>12,706</b>

3% Internal Capture Reduction for AM Peak Hour/1% Internal Capture for PM Peak Hour  
Internal Capture only between General Office/Medical Office and Retail Uses.

**Table 4**  
**“Pass-by” Trip Reduction Factors**  
**Florida Gulf Coast Business Center**

Land Use	Percentage Trip Reduction
Shopping Center (LUC 820)	30%

**Table 5**  
**Approved Net New External Trip Generation**  
**Florida Gulf Coast Business Center**

Land Use	Weekday A.M. Peak Hour			Weekday P.M. Peak Hour			Daily (2-way)
	In	Out	Total	In	Out	Total	
Total External Trips	755	159	914	366	956	1,322	12,706
External Retail Trips (Less Internal Capture)	27	18	45	64	63	127	1,074
Less 30% Pass-by	-7	-7	-14	-17	-17	-34	-322
<b>New, External Trips</b>	<b>748</b>	<b>152</b>	<b>900</b>	<b>349</b>	<b>939</b>	<b>1,288</b>	<b>12,384</b>

## PROPOSED MODIFICATION IN INTENSITIES

The Developer desires to modify the conditions of the Comprehensive Plan to remove the requirement that 50% of the floor area of the project has to be light industrial land uses within this land use category (Industrial Commercial Interchange). In conjunction with this text amendment, the property owner would request a change in the mix of uses to permit additional commercial General and Medical Office uses while decreasing the amount of Industrial floor area. **Tables 6 through 10** illustrate the trip generation of the revised intensities with the requested removal of the limit of industrial uses on the site.



**Table 6**  
**Proposed Land Uses**  
**Florida Gulf Coast Business Center**

Land Use	Size
Industrial Park (LUC 130)	130,000 square feet
Shopping Center (LUC 820)	20,000 square feet
General Office Building (LUC 710)	400,000 square feet
Medical Office Building (LUC 720)	170,000 square feet
<b>TOTAL DEVELOPMENT</b>	<b>720,000 square feet</b>

**Table 7**  
**Proposed Trip Generation**  
**Florida Gulf Coast Business Center**

Land Use	A.M. Peak Hour			P.M. Peak Hour			Daily (2-way)
	In	Out	Total	In	Out	Total	
Industrial Park (130,000 square feet)	36	8	44	10	34	44	1,076
Strip Retail Plaza (20,000 square feet)	27	18	45	64	63	127	1,074
General Office (400,000 square feet)	485	67	552	89	436	525	3,876
Medical Office (170,000 square feet)	307	81	388	207	482	689	7,197
<b>Total Trips</b>	<b>855</b>	<b>174</b>	<b>1,029</b>	<b>370</b>	<b>1,015</b>	<b>1,385</b>	<b>13,223</b>

ITE Trip Generation Report, 11<sup>th</sup> Edition

**Table 8**  
**Proposed External Trip Generation**  
**Florida Gulf Coast Business Center**

Land Use	Weekday A.M. Peak Hour			Weekday P.M. Peak Hour			Daily (2-way)
	In	Out	Total	In	Out	Total	
Total Trips	855	174	1,029	370	1,015	1,385	13,223
Less 3% AM/1% PM Internal Capture	-14	-14	-28	-6	-6	-12	-397
<b>Total External Trips</b>	<b>841</b>	<b>160</b>	<b>1,001</b>	<b>364</b>	<b>1,009</b>	<b>1,373</b>	<b>12,826</b>

2% Internal Capture Reduction for AM Peak Hour/1% Internal Capture for PM Peak Hour  
Internal Capture only between General Office/Medical Office and Retail Uses.

**Table 9**  
**“Pass-by” Trip Reduction Factors**  
**Florida Gulf Coast Business Center**

Land Use	Percentage Trip Reduction
Shopping Center (LUC 820)	30%

**Table 10**  
**Proposed Net New External Trip Generation**  
**Florida Gulf Coast Business Center**

Land Use	Weekday A.M. Peak Hour			Weekday P.M. Peak Hour			Daily (2-way)
	In	Out	Total	In	Out	Total	
Total External Trips	841	160	1,001	364	1,009	1,373	12,826
External Retail Trips (Less 3.0% Internal Capture)	27	18	45	64	63	127	1,074
Less 30% Pass-by	-7	-7	-14	-17	-17	-34	-322
<b>New, External Trips</b>	<b>834</b>	<b>153</b>	<b>987</b>	<b>347</b>	<b>992</b>	<b>1,339</b>	<b>12,504</b>

**Table 11** then compares the trip generation from the approved uses and intensities to the proposed uses and intensities.

**Table 11**  
**Trip Generation Increase (Decrease)**  
**Florida Gulf Coast Business Center**

Land Use	Weekday A.M. Peak Hour			Weekday P.M. Peak Hour			Daily (2-way)
	In	Out	Total	In	Out	Total	
Total External Trips As Proposed (873,001 square feet)	834	153	987	347	992	1,339	12,504
Total External Trips As Approved (873,001 square feet)	-748	-152	-900	-349	-939	-1,288	-12,384
<b>Trip Change</b>	<b>86</b>	<b>1</b>	<b>87</b>	<b>-2</b>	<b>53</b>	<b>51</b>	<b>120</b>

Note: A positive number in the Trip Change row indicates an INCREASE in trips and a negative number indicates a DECREASE in Trips

As can be seen from Table 11, the Weekday A.M. Peak Hour Trip generation is within twenty (87) trips. The Weekday P.M. Peak Hour is the highest peak hour when compared to the A.M. Peak Hour, so even though the Weekday A.M. Peak Hours shows a slightly larger increase in trips, the Weekday P.M. Peak Hour is the hour in which the Level of Service is evaluated and is also the highest hour of travel on the adjacent roadway links and intersections. The weekday P.M. peak hour only shows an increase of 51 total trips, or an increase of approximately of 3.9% from the currently approved trip generation of the project. This small net increase will have no impact on the adjacent roadway network or the Level of Service on any of the surrounding roadways.



It should also be noted that TR Transportation Consultants conducted traffic counts at the two site access drives of the existing Surgery Center within the Florida Gulf Coast Business Center. The traffic counts were conducted over a period of three consecutive weekdays (Tuesday, Wednesday and Thursday), in order to determine if this site generates traffic similar to a Medical Office use.

A summary of the trip generation counts is attached to this memo that illustrates that the Surgery Center does NOT generate trips consistent with a Medical Office use. The Average Trip Rate for a Medical Office building during the P.M. peak hour is 3.93 trips per 1,000 square feet of building floor area. The surveyed trip rate of the Surgery Center is approximately 1.49 trips/1,000 square feet based on the HIGHEST day surveyed and only 1.15 trips/1,000 square feet based on the three-day average during the survey period. Therefore, the Surgery Center should NOT be counted against Medical Office floor area in the project since this use does not generate traffic consistent with a Medical office use as evident by the traffic surveys.

#### Attachments

ITE Trip Generation Report data from 11<sup>th</sup> Edition  
Traffic Count Summary from Existing Surgery Center



## Florida Gulf Coast Business Center

Lee Plan Consistency  
Exhibit T6

### Lee Plan Consistency

The applicant is requesting to amend the text of the future land use category of "Industrial Commercial Interchange" to remove the restriction placed in 2007 requiring 50% industrial use to enable more clean consistent business uses such as office, medical, research, and laboratory uses next to the newly allowed adjacent multi-family residential. Policy 1.3.4 would be amended as follows:

***POLICY 1.3.4 The Industrial Commercial Interchange areas are designated to permit a mixture of light industrial and/or commercial uses. This category does not permit heavy industrial use. Within areas expanded beyond the existing Industrial Commercial Interchange boundaries (on January 1, 2007), retail commercial uses will be limited to 20% of the total floor area. and light industrial uses will be a minimum of 50% of the total floor area. (Ord. No. 07-10)***

### This change in text is consistent with the following Lee Plan Policies, Goals, and Objectives:

POLICY 1.6.1: The Airport Noise Zones (Map I-E) cover areas subject to varying levels of airport-related noise. In conformance with Airport Noise Compatibility Planning outlined in Title 14 of the Code of Federal Regulations (CFR) Part 150, the Port Authority will update the aviation forecasts and associated noise contours for the Southwest Florida International Airport when warranted by operational changes and will initiate an amendment to the Airport Noise Zone Overlay to reflect the updates as applicable. In addition to meeting the requirements of the underlying Future Land Use Map categories, properties within the Airport Noise Zone Overlay must meet the following:

Zone C and D allow existing and new construction and land uses as would otherwise be permitted by the LDC. These zones require formal notification as provided for in the LDC. (Ord. No. 00-22, 02-02, 03-02, 16-16)

The proposed location according to the Port Authority fall under Airport Noise C. The recorded plat has the required notice per Airport School Protection Zone outlined in Sec. 34.1104(B)(2)(a) states "The developer, successor or assign acknowledges the property's proximity to Southwest Florida International Airport and the potential for noises created by and incidental to the operation of the airport as outlined in Land Development Code [Section 34-1104](#). The developer, successor or assign acknowledges that a disclosure statement is required on plats, and in association documents for condominium, property owner and homeowner associations as outlined in Land Development Code Section 34-1104(b)."

**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.





This property is located in an urban infill area adjacent to I-75 and just north of Alico Road fronting Three Oaks Parkway. The area is part of a contiguous and compact growth pattern and contains all urban services including complete public utility services.

**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.*

This property is located in an Urban Area with adequate public facilities and is part of an infill location creating a compact and contiguous development. This is an existing and developing Business Park surrounded by an adequate road network and nearby housing in the area for the workers planned for these office, professional, and commercial uses. This Amendment will allow the restoration of some of the commercial uses lost when Vintage Commerce Center and Alico Crossroads were converted from Industrial Commercial to General Interchange with a reduction of approximately 40 acres of commercial uses converted to multi-family residential uses.

**POLICY 2.2.1:** *Rezoning 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.*

This property is already zoned for existing and planned uses and is adjacent to an extensive roadway network, central sewer and water lines, and EMS, Fire and Police protection. This Amendment will also enhance the look and visual image of the buildings on the site from I-75 and Three Oaks Parkway due to the high visibility along this corridor. This Amendment will allow for a reduction of large footprint industrial and warehouse buildings on the site and replace them with attractive office, research, and medical buildings. This will produce an attractive commercial corridor in this location.

**OBJECTIVE 2.3: FUTURE LAND USE MAP AMENDMENTS.** *Regularly examine the Future Land Use Map in light of new information and changed conditions and make necessary modifications.*

This Text Amendment is being requested due to new information and changed conditions as described in Objective 2.4 of the Lee Plan. Lee County has reclassified the adjacent properties to the south to the General Interchange Land Use category allowing multi-family housing adjacent to this property. Our request will continue employment-based business use on our property while reducing the amount of light industrial now required directly adjacent to this multi-family residential housing.

**OBJECTIVE 2.5: HISTORIC RESOURCES.** *Historic resources will be identified and protected pursuant to the Historic Preservation Element and the County's Historic Preservation Ordinance. (Ord. No. 94-30, 00-22)*

After a thorough assessment, we have determined that there are no historical elements present on the site





*GOAL 6: COMMERCIAL LAND USES. To permit orderly and well-planned commercial development at appropriate locations within the County. (Ord. No. 94-30)*

*POLICY 6.1.4: Commercial development will be approved only when compatible with adjacent existing and proposed land uses and with existing and programmed public services and facilities*

**The current Future Land Use designation permits commercial development, and the proposed text amendment aims to enhance this allowance by enabling additional commercial development. This change is designed to remain consistent with existing and planned land uses in the area.**

*POLICY 6.1.5: Maintain land development regulations that require commercial development be designed to protect the traffic-carrying capacity of roads and streets. Methods to achieve this include but are not limited to: frontage roads; clustering of activities; limiting access; sharing access; setbacks from existing rights-of-way; acceleration, deceleration and right-turn-only lanes; and, signalization and intersection improvements. (Ord. No. 94-30, 00-22, 23-08)*

**The proposed text amendment is in an area where capacity exists on the adjacent roadway network. As shown in the attached Transportation Impact Statement, this proposed amendment will not cause any negative impacts to the County Long Range Transportation Plan. The proposed development results in an insignificant change in trips as compared to the existing zoning and land use approvals.**

*GOAL 7: INDUSTRIAL LAND USES. To promote opportunities for well-planned industrial development at suitable locations within the County.*

*POLICY 7.1.1: In addition to the standards required herein, the following factors apply to industrial rezoning and development order applications:*

- 1. The development must comply with local, state, and federal air, water, and noise pollution standards.*
- 2. When located next to residential areas, industry must not generate noise levels incompatible with the residential development.*
- 3. Bulk storage or production of toxic, explosive, or hazardous materials will not be permitted near residential areas.*
- 4. Contamination of ground or surface water will not be permitted.*
- 5. Applications for industrial development will be reviewed and evaluated as to:*
  - a. air emissions (rezoning and development orders);*
  - b. impacts and effects on environmental and natural resources (rezoning and development orders);*
  - c. effect on neighbors and surrounding land use (rezoning);*
  - d. impacts on water quality and water needs (rezoning and development orders);*
  - e. drainage system (development orders);*
  - f. employment characteristics (rezoning);*
  - g. fire and safety (rezoning and development orders);*
  - h. noise and odor (rezoning and development orders);*
  - i. buffering and screening<sup>4</sup> (planned development rezoning and development orders);*



- j. impacts on transportation facilities and access points (rezoning and development orders);*
- k. access to rail, major thoroughfares, air, and, if applicable, water (rezoning and development orders);*
- l. utility needs (rezoning and development orders); and m. sewage collection and treatment (rezoning and development orders).*

**The property is ideally suited to complying with the above standards. The mixed-use potential proposed consisting of light industrial, commercial and office use should create a greater compatibility with the residential to the south and north.**

**GOAL 11: MIXED USE:** *Encourage mixed use developments that integrate multiple land uses, public amenities and utilities at various scales and intensities in order to provide: diversified land development; a variety of housing types; greater connectivity between housing, workplaces, retail businesses, and other destinations; reduced trip lengths; more transportation options; and pedestrian and bicycle-friendly environments.*

**This property is providing a high wage employment center to the surrounding residential communities and is part of a mixed-use development creating greater connectivity between housing, workplaces, and retail business with reduced trip lengths and various transportation options. Three Oaks Parkway connects this development to the south all the way to Radio Road in Collier County and will soon connect northward to Daniels Parkway in Lee County.**

**Retail businesses located at Alico Road and in Gulf Coast Town Center provide nearby restaurants and retail support for the workers at this location.**

**OBJECTIVE 11.1: MIXED USE DEVELOPMENT.** *Allow and encourage mixed use development within certain future land use categories and at appropriate locations where sufficient infrastructure exists to support development.*

**This Text Amendment encourages Mixed Use Development on this Industrial Commercial Interchange property while providing for a wider range of uses, including higher concentrations of office, medical, healthcare, research and development facilities, on property with high visibility from Three Oaks Parkway and from I-75. This employment center will provide a variety of job opportunities to the surrounding communities of San Carlos Park, Three Oaks as well as those living in the wider Lee County area of Corkscrew Road, Gateway and Lehigh. Lee County has planned future roadway extensions of Alico Road to the east and Three Oaks Parkway to the north to enhance the connectivity of this site to several residential hubs of the County (see the Exhibits attached). This location has sufficient existing infrastructure to support this development.**

*POLICY 36.1.4: Protect the through traffic capacity of the County's expressways, controlled access facilities, principal and minor arterials, and major collectors depicted on Map 3-B. (Ord. No. 17-13)*

**In both the approved and proposed trip generation analysis, the peak occurred in the weekday PM timeframe. The total PM peak hour increases from 1,288 to 1,339 trips which is a total of only 51 additional trips onto adjacent roadways. The PM peak hour only has a**





**3.9% increase from previously approved conditions which will not have any impact on adjacent roadway networks or the Level of Service on any of the surrounding roadways. Please see the attached traffic impact analysis memorandum for additional information.**

*OBJECTIVE 39.6: BICYCLE/PEDESTRIAN NETWORK. When conducting all transportation planning and engineering studies, consider the convenience, safety and accessibility of bicyclists and pedestrians of all ages. (Ord. No. 98-09, 99-15, 17-13)*

**Pedestrian network currently is well established providing safe and accessibility of bicyclists and pedestrians**

*OBJECTIVE 53.1: The county will ensure the provision of acceptable levels of potable water service throughout the future urban areas of the unincorporated county, either directly by Lee County Utilities, or indirectly through franchised utility companies.*

**This property has acceptable levels of public water service provided by Lee County Utilities.**

*OBJECTIVE 56.1: The county will ensure the provision of acceptable levels of sanitary sewer service throughout the future urban areas of the unincorporated county.*

**This property has acceptable levels of public sewer service provided by Lee County Utilities.**

*GOAL 158: Achieve and maintain a diversified and stable economy by providing a positive business climate that assures maximum employments. (Ord. No. 23-08)*

*POLICY 158.2.1: Allocate adequate land on the Future Land Use Map and in Table 1(b) to meet the future commercial, industrial, agricultural, residential, and recreational needs of residents and visitors to the County.*

**Having a balance of commercial, office, research, and supporting retail uses at this location will provide enhanced workplace and job opportunities while improving consistency with the recent Land Use changes to the south allowing residential uses in this area. This property provides for a visually pleasing transition from I-75 with Corporate Headquarters, laboratories, research, and medical offices between Three Oaks Parkway and I-75 while providing sufficient light industrial, manufacturing, distribution, and warehousing to the west along the Oriole Road corridor and to the west. This will add diversification to a typical industrial subdivision while providing a more appropriate use adjacent to the recently approved residential zoning. It will also help to provide for the existing and projected medical and healthcare needs for the residential communities in the area. The project will continue to meet appropriate commercial architectural standards, proper open space, and appropriate buffering requirements.**

**This location approximately midway between downtown Ft. Myers and downtown Naples and near the Southwest Florida International Airport and Florida Gulf Coast University is developing as a significant business and employment center in the region. This Text Amendment will continue the mixed-use business activity at this location while recognizing the changing character of the location in close proximity to recently added residential uses. It will focus on cleaner business uses with less industrial truck traffic while recognizing that**





providing additional employment opportunities in proximity to residential areas seeks to integrate home and work life in order to promote the high quality of family life desired in Lee County while reducing traffic congestion and limiting sprawl.

## **5. Infrastructure and Services**

The property is serviced by adequate public services including water and sewer service provided by Lee County Utilities. All utility lines are in place and accepted by Lee County. An Environmental Resource Permit has been issued by the South Florida Water Management District for the property as part of a Unified Drainage Plan and the surface water management system has been constructed, accepted, and is in service. The San Carlos Park Fire District has a new fire station located within one mile of the site and Fire and EMS services are provided by that Station. Police service is currently provided by Lee County Sheriff's Office. Solid Waste service is currently provided by Lee County Solid Waste. The request does not change the Land Use category which does not allow residential uses. Therefore, population accommodation of the Future Land Use Map (FLUM) is not affected. Similarly, since there is no increased impact to population, there is no impact to School population, Community or Regional Park use. Soils and Historic Resources have been previously evaluated when Zoning and Development Orders were issued for the property.

Roadway access is provided by Three Oaks Parkway extension north of Alico Road. Traffic circulation is provided from US 41, Metro Parkway extension, Alico Road, Oriole Road extension, Ben Hill Griffin Boulevard, I-75, and Three Oaks Parkway. Three Oaks Parkway is also currently being extended by Lee County northward toward Daniels Parkway to provide additional access and circulation in the future.

## **Conclusion**

In conclusion, the Text Amendment to the Lee Plan is an appropriate change for this property. The property is currently zoned for the commercial, office, research, laboratory, medical, and light industrial uses contemplated by the Industrial Commercial Land Use category and these uses promote a diverse economy. While the Industrial Commercial Interchange category is in place on the north side of Alico Road on the east and west sides of I-75, this is the only property affected by this Text change as it is the only property added after 2007. The Text Amendment proposed will only enhance the development by removing the restriction on substantial industrial development to allow for more compatible and visually pleasing uses next to the Interstate and the multi-family properties approved to the south.

Development of the property has all requisite public urban services and will not have negative environmental or transportation impacts and will not negatively impact historic resources in Lee County. The proposed Text Amendment simply confirms the Lee Plan policy objective of providing additional high wage job opportunities to the residents of the area and of Lee County. The proposed amendment is consistent with and implements several policies in the Lee Plan. The Text Amendment does not increase density or intensity; does not underutilize public resources or infrastructure; does not reduce open space, buffering, landscaping, or preservation areas; and does not otherwise adversely impact the surrounding properties. For these reasons, the proposed amendment should be approved.

Quattrone &  
Associates, Inc.



### **Florida Gulf Coast Business Center**

Environmental Analysis  
Exhibit T-7

The 78.8± acre Florida Gulf Coast Business Center project consists of disturbed land. Located within a portion of Section 3, Township 46 South, Range 25 East, Lee County, Florida. The parcel is bordered to the west by Three Oaks Parkway, to the east by I-75, to the south by improved pasture, and to the north by improved pasture and preserved wetlands.

The text amendment to 1.3.4 "Industrial Commercial Interchange" will not have an effect on the environmental aspects of the site. In accordance with SFWMD and county requirements, and any listed species, if encountered will be addressed per local and state requirements.



**Florida Gulf Coast Business Center**

Historical Resources Impact Analysis  
Exhibit T8

**Florida Master Site File**

Per the Florida Master Site File, there are not any previously recorded cultural or historic resources located within 150 feet of the subject property.

**Archaeological Sensitivity Map**

According to the Archaeological Sensitivity are identified on the proposed site on the Lee County Archaeological Sensitivity Map dated June 28, 2019. See below.





**FLORIDA GULF COAST BUSINESS CENTER**

State and Regional Policy Plan  
Exhibit T9 + T10

STATE POLICY PLAN

EXHIBIT T9

There are no State Policy Plan goals or policies that are relevant to the proposed text amendment

REGIONAL POLICY PLAN

EXHIBIT T10

There are no Regional Policy Plan goals or policies that are relevant to the proposed text amendment.