December 11, 2024

MarySue Groth
Planner
Lee County Community Development, Zoning Section
1500 Monroe Street
Fort Myer, FL 33908

Re: Town Lakes CPD Amendment
2nd INSUFFICIENCY RESPONSE LETTER
ADD2024-00149

Dear MarySue:

Enclosed please find responses to your insufficiency letter dated *November 15, 2024*. The following information has been provided to assist with the approval process:

1. Insufficiency Comment Response Letter
2. Revised Deviations (to add deviations #20 and #21)
3. Revised MCP (to add deviation #20 and #21)
4. Landscape Plan in support of Deviation #21
5. Revised TIS

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

Development Services

The proposed access off of Williams Ave and the proposed interconnection with the parcel to the south is not consistent with the approved Development Order plans associated with the parcel to the south (DOS2021-00079). Development Services staff acknowledges the response to comments that the interconnection is no longer desired by the parcel to the south and that the DO (DOS2021-00079) will be modified to reflect the new acreage and design. Interconnection between the sites is required pursuant to LDC Sec. [10-610(e)]. Please address or obtain the necessary deviation.

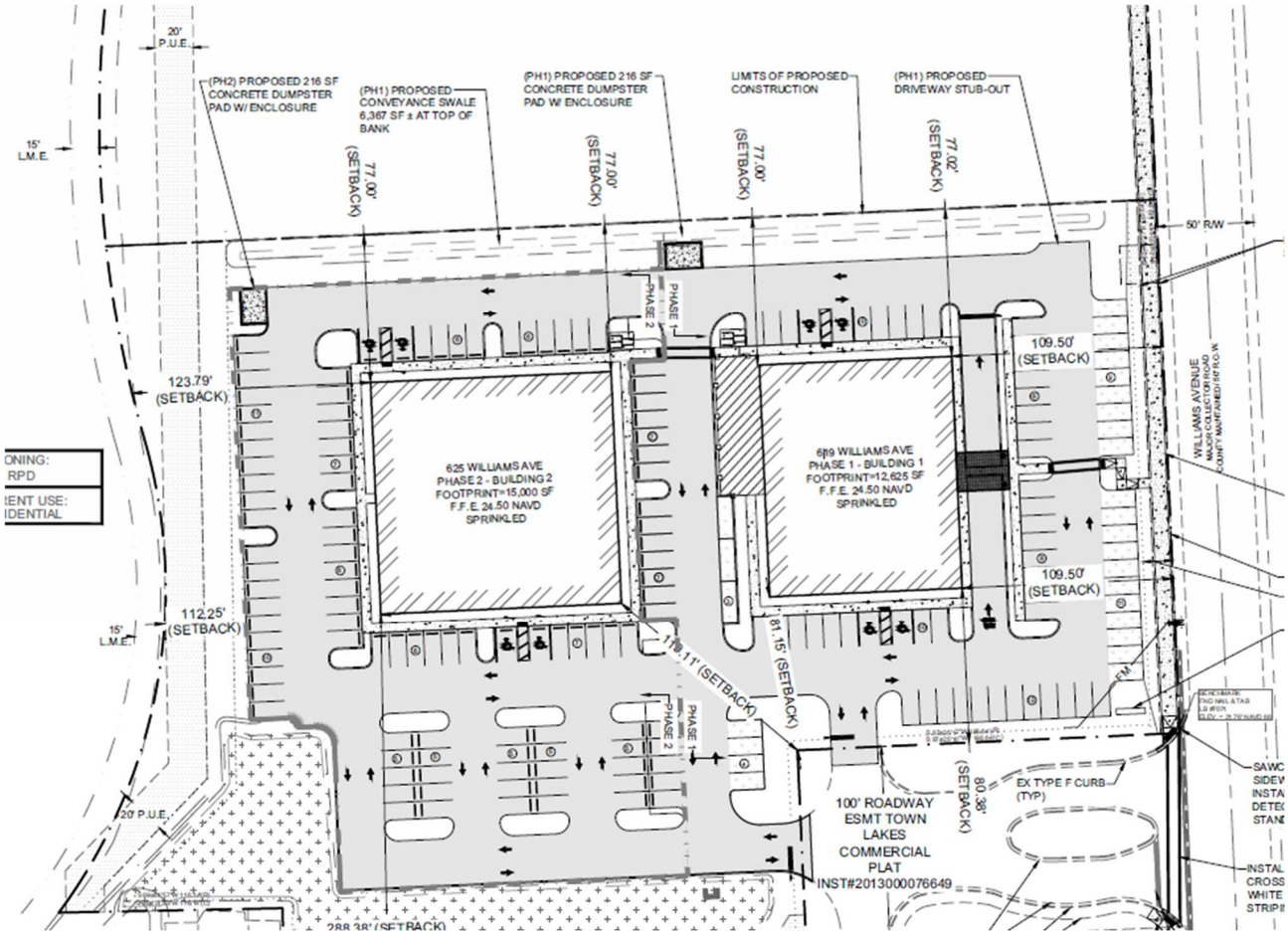
RESPONSE: The old church approval notes a future stub out – no interconnection. The stub-out was when the anticipated expansion north would be more church development and the lot was under common ownership.

We have added Deviation #20 (from LDC 10-610(e) & 33-1412) as part of this Amendment to allow no interconnection based on incompatible uses and neither property owner nor the local public wanting the interconnection?

> **20. Interconnection. Deviation (20) seeks relief from the LDC § 10-610(e) and 33-1412, which state that adjacent commercial uses must provide parking lot interconnections for automobile, bicycle and pedestrian traffic, to no interconnection required between Tract A-N and Tract A-S.**
>
> **JUSTIFICATION: Interconnection was never necessary but was a negotiated agreement to benefit the church as part of the land purchase from them for the**

warehouse. The church has access to Williams Road via the primary entrance for the CPD. This has been in existence for a long time. The church's development order (DOS2021-00079) is in the process of being amendment with submittal going into the County and fees paid by 2024-12-06. The interconnection is removed for the DO plans for the church. The church already has legal access to Williams Road to the south as shown below. No new access to Williams will be requested or necessary. The applicant is comfortable with a condition specifying no additional access points on Williams Road will be permitted. We also acknowledge that if the use of the church property were to change that LCDOT reserves the right to reconsider the interconnection.

Interconnection between the proposes tracts in not appropriate. The uses and revised layout create incompatibilities with an interconnection that are not desired by either party. A church on Tract A-S and commercial warehouse on Tract A-N. The warehouse property has commercial traffic and is a fenced and secured property to ensure security of the storage units. There is no pedestrian pass through of the site to be used by an interconnection. Each tract is a definitively different destination.



DOT

The access on Williams Ave must be shared with the property adjacent to the south (Tract A-S) to be consistent with the master concept plan MCP approved in Resolution Z-24-013.

Identify separation distances of the access drive on Williams Ave on the MCP.

RESPONSE: The MCP is being changed per this amendment to no longer be shared. The location of the access onto Williams is the same as previously proposed. The MCP shows 286 feet from Fountain Mist and 249 feet from the access south, same as approved in zoning.

TIS

The purposes of this administrative amendment are (a) to add Public Warehouse and Hybrid Warehouse to the schedule of use previously approved in Resolution Z-24-044 and (b) to increase the maximum building coverage in Tract A-N from 45% to 53%. The land use code (LUC) 151 (Mini Warehouse) is assigned in the submitted TIS. However, the Warehouse, Mini-Warehouse was previously included in the schedule of use approved in Resolution Z-24-044. The TIS must be revised to demonstrate that the additional uses (Public Warehouse and Hybrid Warehouse) and increased maximum building coverage in Tract A-N proposed in this amendment will not increase the trip ends from the previously approved Resolution Z-24-044.

RESPONSE: Attached is the revised TIS titled "TIS 2024-12-11 ADD Response". The added uses did not increase traffic or change volumes.

The proposed project is a self-storage facility. The unit sizes range from 5 ft x 5 ft to 10 ft x 30 ft. Units are rented to specific individuals or small businesses for storage of personal property or equipment. ITE code 151 – Mini-warehouse most accurately represents the project for both self storage or hybrid storage.

However, as the Public Warehouse Use is being added, the Traffic analysis provided with the recent CPDA amendment has been revised to include ITE code 150 Public Warehouse. The expected trips are still within those originally approved for the CPD.

The increase in building coverage does not increase the requested square footage.

OTHER

During the review of our development order resubmittal for the warehouse we realized an additional deviation that needs addressed. Building perimeter planting requirements for Building #2 are not able to be met due loading zones, parking, and overhead storage doors to access exterior units. This is typical of many storage warehouses. After discussions with staff we added deviation #21 with the caveat that the landscaping plan show additional plantings in other significant areas. The deviation request and justification is below and the enhanced landscape plan is attached in the resubmittal.

21. Building Perimeter Plantings. Deviate from LDC §10-416(b**)** *Building perimeter plantings* which requires commercial buildings to provide building perimeter planting area equal to ten percent of the building ground level floor area to reduce the required foundation planting area for Building #2 by 80% with landscape required along all portions of the Building #2 perimeter that are not used for doors.

    JUSTIFICATION: The enhanced landscape plan shows 2% perimeter building plantings for Building #2 plus additional ground plantings in other areas.

    Perimeter landscaping along commercial buildings is required to break up long expanses of blank building walls, create a softening effect and add visual interest. Landscaping is

to be placed with emphasis on the sides most visible to the public, not including the loading areas.

In the case of Building #2, loading areas with overhead doors to access storage units are located along the majority of the building facades. The perimeter of Building #2 is 1,038 ft. and approximately 835 ft is covered by doorways (80%). To meet the planting area requirement when only 20% of the building perimeter can be used for landscape would require excessively wide landscape beds. This deviation proposes using all available areas adjacent to Building #2 for planting with minimum 5 ft width or as needed to meet the code required planting area reduced by 80%.

The intent of the code is met as all available areas adjacent to the building are utilized to landscape the building façade. Additionally, building #2 is almost completely screened from adjacent rights of way and the abutting properties by the exterior buildings. A reduction in the landscape area does not negatively impact the adjacent properties or the health, safety or welfare of the patrons or the general public.

The proposed Landscape Plan is included with the Building #2 planting areas highlighted.

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

Sincerely,

RVi Planning + Landscape Architecture

Fred Drovdlic, AICP
Planning Director