

**TIS MEMORANDUM**

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December 5, 2024

TOWNLAKES COMMERCIAL PLANNED DEVELOPEMNT
ADD2024-00149

STRAP#s: 30-44-27-L2-1700A.0001
625 Williams Ave, Ft. Lehigh Acres, FL

Staff Comment:

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:

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. The LDC definitions for Mini-Warehouse, Public Warehouse and Hybrid Warehouse are attached.

Public Warehouse was added to the schedule of uses because as defined in the Lee County Land Development Code, when units are accessed through interior doors rather than overhead doors the land use may be classified as public warehouse rather than mini-warehouse. Some of the units in the proposed project are accessed through common interior space while other units are accessed from exterior doors.

Hybrid Warehouse was also added to allow for flexibility in unit mix or if ancillary uses were to be added to some of the larger units.

For the purposes of traffic analysis, regardless of interior or exterior door access, or additional features that may be included with a Hybrid Warehouse, ITE code 151-Mini Warehouse most accurately represents the self storage project and the improvements shown on the CPD Master Concept Plan.

The following ITE codes are associated with Warehousing:

- 150 – Warehouse
- 151 – Mini Warehouse
- 154 – High-Cube Transload Warehouse and Short Term Storage Warehouse



155 – High-Cube Fulfillment Center Warehouse
156 – High-Cube Parcel Hub Warehouse
157 – High-Cube Cold Storage Warehouse

ITE code 151 – Mini Warehouse is the appropriate code for self storage and also has been used for trip generation for other Hybrid warehouse projects in Lee County.

ITE 150 warehouse does not reflect this project. Warehouse would be a larger building serving a single or small number of businesses and used to store, manage and distribute inventory. This would typically be a large open space with storage on shelves or pallets rather than individual smaller units. TE codes 154-157 are associated with distribution facilities, which are expected to generate more traffic due to delivery and shipping activities.

The TIS submitted with Z-24-044 demonstrated that 140,000 sf of additional mini-warehouse (ITE 151) would not increase the expected traffic for the overall Townlakes CPD. The TIS is attached again here and has been revised to clarify it includes 140,000 sf of mini-warehouse, public warehouse and/or hybrid warehouse.

Although ADD2024-00149 requests an increase in building coverage (FAR), the total proposed building square footage has not changed from the 140,000 sf previously approved under Z-24-044. The increase from 45% to 53% coverage is due to Building #1 changing from 3 stories to 1 story.

Whether the project is defined in the LDC as mini-warehouse, public Warehouse or hybrid storage, ITE code 151 provides the most representative analysis. There is no expected increase in traffic from what was previously approved under Z-99-022 for the TownLakes CPD & Z-24-044.



TRIP COMPARISON

Table 1, below, outlines the anticipated weekday P.M. peak hour trip generation of the proposed 140,000 storage uses requested, based on *Institute of Transportation Engineers Trip Generation, 11th Edition*.

ITE-151 Mini-Warehouse is the appropriate land use code.

TOWNLAKES COMMERCIAL CPDA TABLE 1: TRIP GENERATION – PROPOSED			
Land Use	P.M. Peak Hour*		
	In	Out	Total
ITE – 151 Mini-Warehouse (Self-Storage/Hybrid Storage and/or Public Warehouse) (140,000 sf)	10	11	21

Table 2 shows the retail square footage that would generate the equivalent PM Peak hour trips.

TOWNLAKES COMMERCIAL CPDA TABLE 2: TRIP GENERATION – EQUIVALENT RETAIL			
Land Use	P.M. Peak Hour*		
	In	Out	Total
Retail (1,700 sf) ITE – 822	11	11	22

CONCLUSION

As indicated by the tables above, a reduction in 1,700 sf of retail use in the CPD would allow for construction of 140,000 sf of self storage, public warehouse or hybrid storage.

As the CPD is substantially built out with an approved Development order for the remainder of Tract A, and there is 13,663 sf remaining retail sf available in the CPD, the proposed amendment to allow the 140,000 sf of mini-warehouse/public warehouse or hybrid storage will still represent a decrease in overall trips from what was anticipated in the original Townlakes CPD approval.



REFERENCES:

Trip Generation by OTISS Online Traffic Impact Study Software (ITE Trip Generation 11th Edition)

Cumulative Development Table (as approved under DOS2020-00079)

Lee County Land Development Code Definitions:

Mini-warehouse means any building designed or used to provide individual storage units with separate exterior doors as the primary means of access, to individuals or businesses for a fee. The storage units must be used solely as dead storage depositories for personal property, inventory and equipment and not for any other use. See Warehousing, public, and Storage, dead.

Warehouse, hybrid, means any building designed or used to provide individual storage units with separate exterior doors as the primary means of access, to individuals for a fee or through individual ownership. In addition to dead storage depositories for personal property, individual storage units may also include ancillary accommodations such as restrooms, mezzanines, or other improvements to create occupiable space, as defined by the Florida Building Code, for personal hobby or recreation space for individual unit tenants or owners. See Mini-warehouse, Warehouse, public, and Storage, dead.

Warehouse, public, means indoor storage units available to the general public at a fee for the dead storage of farm products, furniture and other household goods or commercial or private goods of any nature. Access to the storage units is from interior doors and individual exterior overhead doors are not provided. See also Mini-warehouse.

Land Use: 150 Warehousing

Description

A warehouse is primarily devoted to the storage of materials, but it may also include office and maintenance areas. High-cube transload and short-term storage warehouse (Land Use 154), high-cube fulfillment center warehouse (Land Use 155), high-cube parcel hub warehouse (Land Use 156), and high-cube cold storage warehouse (Land Use 157) are related uses.

Additional Data

The technical appendices provide supporting information on time-of-day distributions for this land use. The appendices can be accessed through either the ITETripGen web app or the trip generation resource page on the ITE website (<https://www.ite.org/technical-resources/topics/trip-and-parking-generation/>).

The sites were surveyed in the 1980s, the 1990s, the 2000s, and the 2010s in California, Connecticut, Minnesota, New Jersey, New York, Ohio, Oregon, Pennsylvania, and Texas.

Source Numbers

184, 331, 406, 411, 443, 579, 583, 596, 598, 611, 619, 642, 752, 869, 875, 876, 914, 940, 1050

Land Use: 151

Mini-Warehouse

Description

A mini-warehouse is a building in which a number of storage units or vaults are rented for the storage of goods. They are typically referred to as “self-storage” facilities. Each unit is physically separated from other units, and access is usually provided through an overhead door or other common access point.

Additional Data

The technical appendices provide supporting information on time-of-day distributions for this land use. The appendices can be accessed through either the ITETripGen web app or the trip generation resource page on the ITE website (<https://www.ite.org/technical-resources/topics/trip-and-parking-generation/>).

The sites were surveyed in the 1980s, the 1990s, the 2000s, and the 2010s in California, Colorado, Massachusetts, Minnesota, Nevada, New Jersey, Texas, and Utah.

Source Numbers

212, 403, 551, 568, 642, 708, 724, 850, 868, 876, 1024, 1035

Mini-Warehouse (151)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA

On a: Weekday,

Peak Hour of Adjacent Street Traffic,

One Hour Between 4 and 6 p.m.

Setting/Location: General Urban/Suburban

Number of Studies: 18

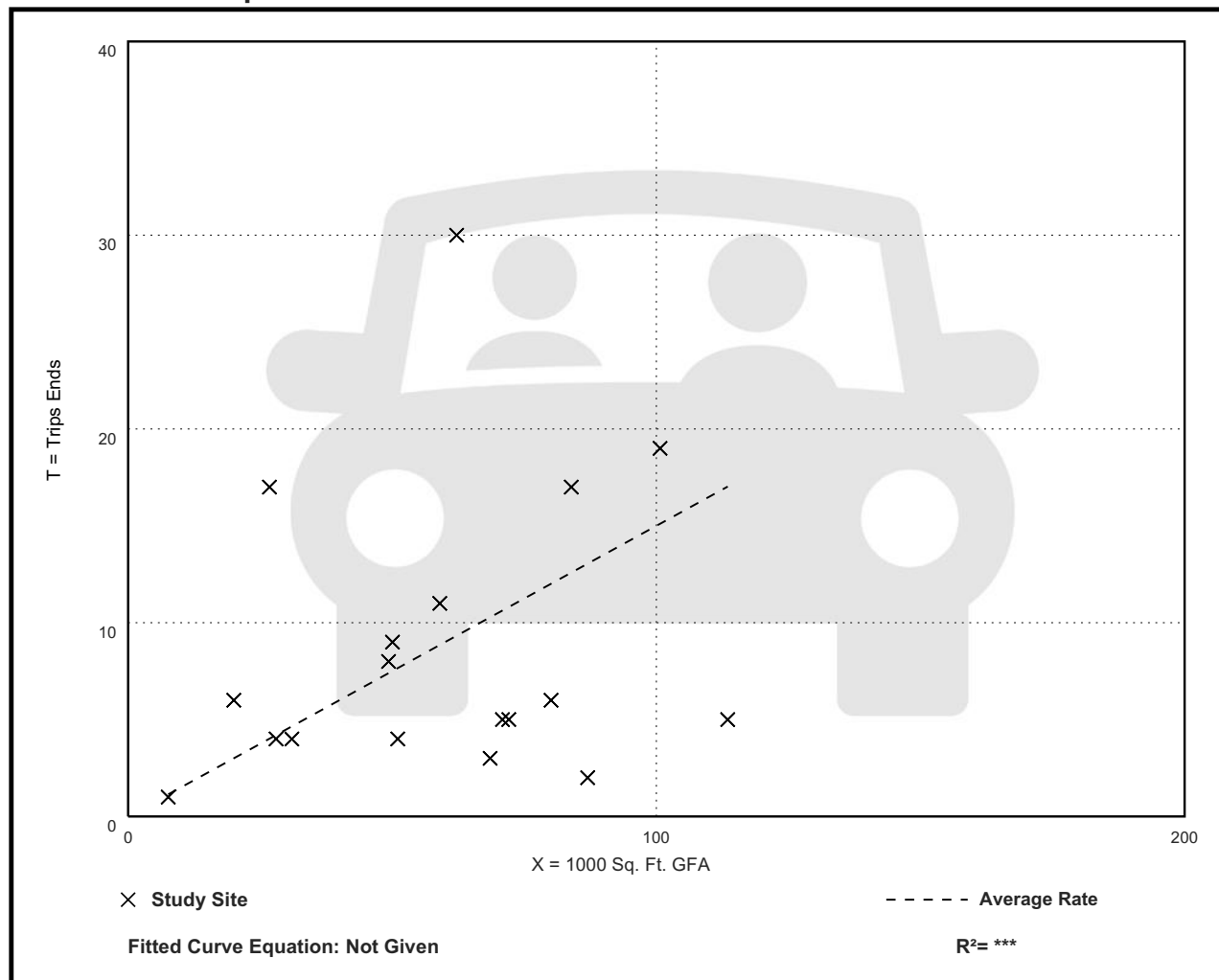
Avg. 1000 Sq. Ft. GFA: 59

Directional Distribution: 47% entering, 53% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
0.15	0.02 - 0.64	0.14

Data Plot and Equation



Scenario - 1

Scenario Name: Arcland Zoning

User Group:

VEHICLE TRIPS BEFORE REDUCTION

Land Use & Data Source	Location	IV	Size	Time Period	Method	Entry	Exit	Total
					Rate/Equation	Split%	Split%	
150 - Warehousing	General	1000 Sq. Ft. GFA	140	Weekday, Peak Hour of Adjacent Street Traffic,	Best Fit (LIN)	12	31	43
Data Source: Trip Generation Manual, 11th Ed	Urban/Suburban				$T = 0.12(X) + 26.48$	28%	72%	
151(2) - Mini-Warehouse	General	1000 Sq. Ft. GFA	140	Weekday, Peak Hour of Adjacent Street Traffic,	Average	10	11	21
Data Source: Trip Generation Manual, 11th Ed	Urban/Suburban				0.15	47%	53%	
822 - Strip Retail Plaza (<40k)	General	1000 Sq. Ft. GLA	4.5	Weekday, Peak Hour of Adjacent Street Traffic,	Best Fit (LOG)	22	22	44
Data Source: Trip Generation Manual, 11th Ed	Urban/Suburban				$\ln(T) = 0.71\ln(X) + 2.72$	50%	50%	

Planned Development Intensities Summary
for
Townlakes Commercial CPD (Z-99-022 / ADD2011-00081)

LAST UPDATED : 02/08/2022

Tract	Strap #:	Project	Building	Type of Use	Land Use Code	Case #:	Status		Building Permit	Area
A	30-44-27-17-0000A.0000	Providence Church	27,625 SF	Church (Non Retail)	560: Church	DOS2021-00079	Pending			
B	30-44-27-17-0000B.0000	Town lakes Commercial Phase 1A	9,970 SF*	Office/Medical Office (Non Retail)	720: Medical/Dental Office	DOS2002-00110 LATEST AMMENDEED A13	Final/Constructed	COM2006-02897	9,978 SF	
C	30-44-27-17-0000C.0000		490 SF*	Mini Golf Shak (Retail)	431: Mini Golf Course		Final/Constructed	COM2003-01346	462 SF	
D	30-44-27-17-0000D.0000		3,600 SF	Restaurant (Retail)	925: Drinking Place		Final/Constructed	COM2003-01344	3,600 SF	
E	30-44-27-17-0000E.0000		2,275 SF	Tennis Court Pro Shop (Retail)	490: Tennis Courts		Final/Constructed	COM2003-01345	2,275 SF	
F	30-44-27-17-0000F.0000	Townlakes Mini Storage	67,175 SF*	Industrial (Mini- Warehouse)	151: Mini-Warehouse	DOS2002-00110/ LDO2014-00440	Final/Constructed	OFFICE 1 COM2006-03750 2 COM2006-03752 3 COM2006-03754 4 COM2006-03755 5 COM2006-03756 6 COM2006-03757 7 COM2006-03758 TOTAL:	1,350 SF 5,400 SF 14,475 SF 11,950 SF 12,000 SF 8,950 SF 7,300 SF 5,600 SF 67,025 SF	
					Open Storage	LDO2014-00440 / ADD2014-00095				10,582 SF
Permitted Intensities										
			6,337 SF	Retail						
			37,603 SF	Non Retail						
			67,025 SF	Mini-Warehouse						
Approved Intensity Per Planned Development										
			20,000 SF	Retail						
			48,000 SF	Non Retail						
			80,000 SF	Mini-Warehouse						
Remaining Intensity										
			13,663 SF	Retail						
			10,397 SF	Non Retail						
			12,975 SF	Mini-Warehouse						

* Where DO and BLDG permit areas are inconsistent, areas based on the Building permits (highlighted), Under Application Information Estimated Building SQFT are used