



Engineers, Planners & Development Consultants

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239.936.5222 | QAINC.NET | f 239.936.7228

September 11, 2025

Ms. Kate Burgess, AICP
Principal Planner, Planning Section
Lee County Community Development
Department of Community Development
P.O. Box 398
Fort Myers, FL 33902-0398

RECEIVED
SEP 11 2025
COMMUNITY DEVELOPMENT

RE: **CPA2025-00003**

Pugliese Multi-Family

Dear Ms. Burgess,

Please find attached a set of revised plans for the above-mentioned project per your comments dated July 2, 2025. Below are written responses to the comments.

Planning Comments

1. The proposed FLUM needs to show more of the area to provide context to the proposed change. Additionally, the FLUM layers go to the center of the ROW. Amend the proposed FLUM to provide better context for the proposed change.

Response: Please see the revised FLUM

2. The Lee Plan Consistency Narrative provides one justification for Objective 1.1 and Policies 1.1.5 and 1.1.4. Address each of these separately with data and analysis that support the proposed change.

Response: Please see the revised narrative.

3. The analysis for Policy 1.6.5 states that District 13 contains 1,318 acres of residential allotment left. The proposed FLUM amendment would permit industrial uses in addition to the existing residential and commercial uses. Provide a more holistic response for all of the potential uses to verify that Table 1b has adequate allocations for all possible outcomes of development on this site.

Response: Please see the revised narrative

4. Remove the reference to the Live Local Act in response to Objective 2.6.

Response: Please see the revised narrative.

5. The response to Policy 5.1.5 states that the requested increase in density is consistent with the surrounding land uses. The Suburban and Urban Community Future Land Use Categories have the same maximum density of 6 units per acre. Additionally, the response states that the change will support a rezoning when the applicant is not requesting a rezone. Revise this response to more accurately reflect the requested Future Land Use Map amendment. Note that the only density difference between Suburban and Urban Community is in the potential Bonus Density; however, TDUs are prohibited in CHHA, so on-site affordable housing would be the only option for additional density.

Response: Please see the revised narrative.

6. The response to Policy 37.1.3 includes a reference to a rezoning. The applicant has not requested to rezone this property. Remove the reference to more accurately reflect the process the proposed development will follow.

Response: Please see the revised narrative.

7. The applicant has restated parts of Policy 101.1.4 as the response to Policy 101.1.4. Provide a response to this policy with the lens that the maximum density of Urban Community and the existing Suburban FLU are the same, with Urban Community allowing Bonus Density when Suburban does not.

Response: Please see the revised narrative.

8. The response to Policy 101.3.7 references the Live Local bonus density. Remove the reference to Live Local and make a more general statement about how the site is in the Coastal High Hazard Area, and the only bonus density proposed will be through the affordable housing program.

Response: Please see revised narrative

9. Exhibit M15, the existing and future public facilities impact analysis, appears to include an incomplete first sentence, and it is unclear what the relationship is to Forest Utilities. Revise accordingly.

Response: Please see revision M15

10. Provide copies of the request letters to the various county departments for the letters of availability.

Response: Please see the attached letters sent to the various departments

11. The second consistency statement in Exhibit M19 states that the map amendment will allow the development of additional density. The Suburban and Urban Community FLUCs have the same maximum density. Revise the response accordingly.

Response: While the standard density range for both the Suburban and Urban Community Future Land Use Categories (FLUCs) is the same "1 to 6 dwelling units per acre (du/acre)" the key difference lies in the allowable bonus density provisions.

Under the Suburban FLUC, bonus density is limited: "This category has a standard density range from one dwelling unit per acre (1 du/acre) to six dwelling units per acre (6 du/acre). The maximum total density may only be increased to eight dwelling units per acre (8 du/acre) utilizing Greater Pine Island Transfer of Development Units, except in areas that specifically prohibit bonus density. Other forms of bonus densities are not allowed."

In contrast, the Urban Community FLUC allows for a significantly higher bonus density: "The standard density range is from one dwelling unit per acre (1 du/acre) to six dwelling units per acre (6 du/acre), with a maximum total density of ten dwelling units per acre (10 du/acre). The maximum total density may be increased to fifteen dwelling units per acre (15 du/acre) utilizing Greater Pine Island Transfer of Development Units."

Therefore, while the base density is the same, the map amendment would enable a higher potential total density through bonus density provisions under the Urban Community FLUC, up to 15 du/acre compared to a maximum of 8 du/acre under the Suburban FLUC.

12. Exhibit M20 does not provide any comparison between the benefits of Urban Community and the existing Suburban designations. Additionally, the justification merely states that the intent is to utilize the FLUM change to support residential uses, which are currently permitted in the Suburban category at the same density. Revise the justification to provide actual justification and reason that the proposed change to Urban Community is appropriate in this location and that the existing Suburban designation is no longer appropriate.

Response: Please see the revised Exhibit M20

ENVIRONMENTAL

13. Please provide analysis of Lee Plan policies 101.1.1, 126.1.4, and Goal 124.

Response: Please see the revised narrative

14. Please detail whether the onsite wetland accepts offsite flows. How will potential off-site flows be addressed?

Response: Please see the revised narrative

LEGAL DESCRIPTION

15. The certified legal description(s) and certified sketch of the description for the property subject to the requested change. A metes and bounds legal description must be submitted, specifically describing the entire perimeter boundary of the property with accurate bearings and distances for every line. The sketch must be tied to the state plane coordinate system for the Florida West Zone (North America Datum of 1983/1990 Adjustment) with two coordinates, one coordinate being the point of beginning and the other an opposing corner.

The description included on the survey submitted is not a metes and bounds description and does not include state plane coordinates at the point of beginning and one opposing corner.

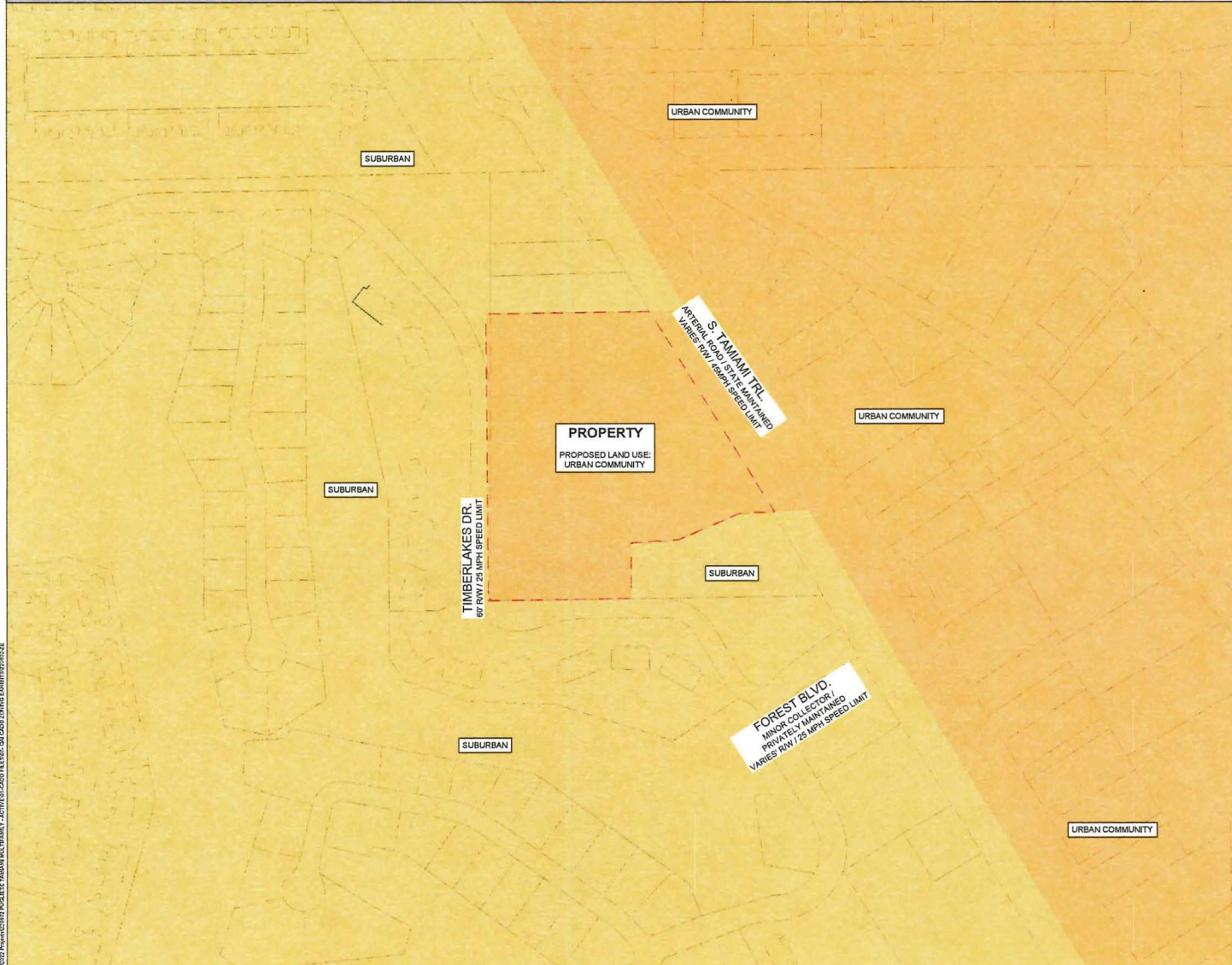
Response: Please see the Legal Sketch and Description Revision

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@qainc.net
Attachments:

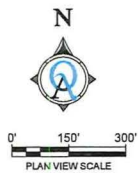
EXHIBIT M-4 FUTURE LAND USE - PROPOSED



- Future Urban Areas**
- Intensive Development
 - Central Urban
 - Urban Community
 - Suburban
 - Outlying Suburban
 - Sub-Outlying Suburban
 - Commercial
 - Industrial
 - Public Facilities
 - University Community
 - Summit Stone Marina Village
 - Destination Resort Mixed Use Water Dependent
- Special Urban Areas**
- Industrial Interchange
 - General Interchange
 - General Commercial Interchange
 - Industrial Commercial Interchange
 - University Village Interchange
 - New Community
 - Transport
 - Airport
- Non-Urban Areas**
- Rural
 - Rural Community Preserve
 - Coastal Rural
 - Outer Island
 - Open Lands
 - Density Reduction/Groundwater Resource
 - Conservation Lands - Upland
 - Wetlands
 - Conservation Lands - Wetland

NOTES:

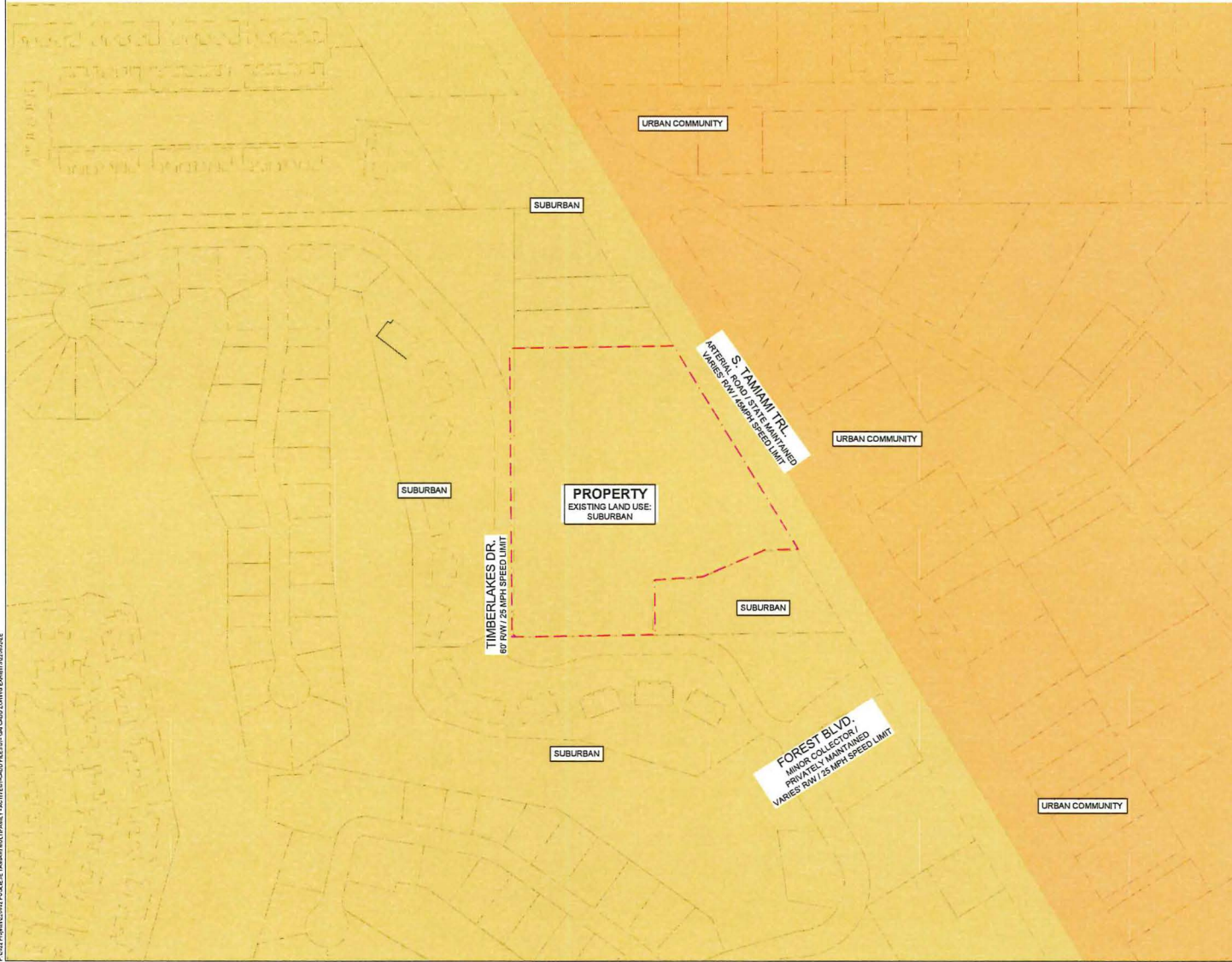
- THIS AERIAL PHOTOGRAPH SHOWN WERE PROVIDED BY LEE COUNTY GOVERNMENT AND WERE TAKEN IN 2022
- FUTURE LAND USE DATA FROM LEE COUNTY GIS OPEN DATA, UPDATED 2022.



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|---|--|
| <p>QUATRONE & ASSOCIATES, INC. 4311 Veterans Blvd., Suite 200 Fort Myers, Florida 33916 Phone: 813-934-4222 Fax: 813-934-4223 Website: www.quatrone.com</p> | <p>PUGLIESE TAMAMI MULTIFAMILY FUTURE LAND USE MAP - PROPOSED ACCESS UNDETERMINED FORT MYERS, FL 33909</p> |
| <p>ALFRED QUATRONE, P.E. FL REG #22741</p> | <p>SHEET M-4 FUTURE LAND USE PROPOSED</p> |

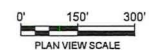
EXHIBIT M-4 FUTURE LAND USE - EXISTING



- Future Urban Areas**
- Intensive Development
 - Central Urban
 - Urban Community
 - Suburban
 - Outlying Suburban
 - Sub-Outlying Suburban
 - Commercial
 - Industrial
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NOTES:

- THIS AERIAL PHOTOGRAPH SHOWN WERE PROVIDED BY LEE COUNTY GOVERNMENT AND WERE TAKEN IN 2022.
- FUTURE LAND USE DATA FROM LEE COUNTY GIS OPEN DATA, UPDATED 2022.



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| | |
|----------|--|
| DATE | |
| REVISION | |
| BY | |

PUGLIESE TAMAMI MULTIFAMILY
FUTURE LAND USE MAP - EXISTING
ACCESS UNDETERMINED
FORT MYERS, FL 33908

Quatrone & Associates, Inc.
PLANNING, DESIGN, & DEVELOPMENT CONSULTANTS
4701 Venetia Shoreway Blvd • Fort Myers, Florida 33916 • 239.916.4222
Certificate of Registration Number: 943

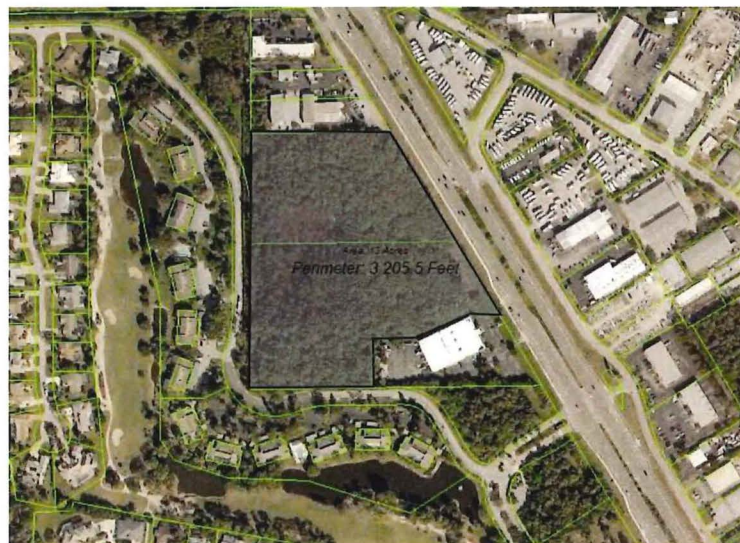
ALFRED QUATRONE, P.E.
FL REG #22747
2285 N. UNIVERSITY BLVD.
SAVED BY: Galvina
SAVED ON: 8/15/22
SHEET
M-4
FUTURE LAND
USE EXISTING

US 41 Pugliese Multifamily

Lee Plan Analysis
Exhibit M12

Request

The proposed Lee Plan Map Amendment is to re-designate subject property from the Suburban Future Land Use to the Urban Community Future Land Use category. The property is located on the west side of US 41 (S. Tamiami Trail) approximately 1.0 mile north of Alico Road. The overall site is 13.20 ± acres consisting of two parcels, including straps # 01-46-24-00-00004.2020 and #01-46-24 00-00004.2020, as demonstrated in the aerial below



Existing and Surrounding Conditions

The subject property is located within the San Carlos Planning. The property is vacant and almost entirely vegetated. The two parcels are zoned Commercial (C-1). The surrounding area has been mostly developed with a mixture of Residential and Commercial uses. Future Land Use Designations zoning and current use of the adjacent parcels is identified in the table below.



| | Future Land Use | Zoning | Use |
|--------------------------------|-----------------|--------|--|
| Subject Property (±13.20ac) | Suburban | C-1 | Vacant Commercial |
| North | Suburban | C-1 | Best Home Services (Air Cond, Repair Svc) |
| East | Urban Community | C-1 | RV Superstore, RV Palm (RV/Car Sales Center) Habitat for Humanity (Retail Thrift Store) PCC Tile (Retail- Tile Store) |
| South | Suburban | C-1 | Wayne Wiles Floor Covering (Retail-Flooring Store) |
| West | Suburban | RM-2 | Forrest County Club (M/F-SF Golf Community) |

Lee Plan Consistency Narrative

Future Land Use Element

OBJECTIVE 1.1: FUTURE URBAN AND SUBURBAN AREAS. Designate areas with varying intensities on the Future Land Use Map (Map 1-A) that provide for a full range of urban activities. These designations are based upon soil conditions, historic and developing growth patterns, and existing or future availability of public facilities and services. (Ord. No. 17-13)

POLICY 1.1.5: The Suburban future land use category will consist of predominantly residential areas that are either on the fringe of the Central Urban or Urban Community future land use categories or in areas where it is appropriate to protect existing or emerging residential neighborhoods. This category provides housing near the more urban areas but does not provide the full mix of land uses typical of urban areas. Industrial land uses are not permitted. This category has a standard density range from one dwelling unit per acre (1 du/acre) to six dwelling units per acre (6 du/acre). The maximum total density may only be increased to eight dwelling units per acre (8 du/acre) utilizing Greater Pine Island Transfer of Development Units except in areas that specifically prohibit bonus density. Other forms of bonus densities are not allowed. (Ord. No. 94- 30, 16-07, 17-13)

The site is currently designated as Suburban; however, this classification is no longer appropriate given its surroundings, which include commercial development, major roadways, and mixed-use areas. The Suburban Future Land Use Category (FLUC) prioritizes the protection of emerging residential neighborhoods and limits bonus density to 8 dwelling units per acre using Greater Pine Island Transfer of Development Units (TDUs). Since the site is located within the Coastal High Hazard Area, the use of these TDUs is prohibited. This restriction conflicts with the site's location and its potential for urban infill or mixed-use development.

POLICY 1.1.4: The Urban Community future land use category are areas characterized by a mixture of relatively intense commercial and residential uses. The residential development in these areas will be at slightly lower densities than other future urban categories described in this plan. As vacant properties within this category are developed, the existing base of public services will need to be maintained which may include expanding and strengthening them accordingly. As in the Central Urban future land use category, predominant land uses in this category will be residential, commercial, public and quasi-public, and limited light industrial with future development encouraged to be mixed use, as described in Objective 1.1.1, where appropriate. The standard density range is from one dwelling unit per acre (1 du/acre) to six dwelling units per acre (6 Future Land Use II-2 April 2024 du/acre), with a maximum total density of ten dwelling units per acre (10 du/acre). The maximum total density may be increased to fifteen dwelling units per acre (15 du/acre) utilizing Greater Pine Island Transfer of Development Units. (Ord. No. 94-30, 02-02, 09-06, 10-10, 10-33, 16-07, 21-09)



The proposed Urban Community designation is well-suited for this site due to its location adjacent to US 41 (South Tamiami Trail) and the US 41 Service Road to the north and its proximity to established urban development. The area is already well-developed with a mix of residential and commercial uses since its prior Suburban designation.

Policy I.1.4 supports mixed-use development, higher densities, and a blend of residential, commercial, and light industrial uses, all of which align with the character and potential of this area. The site's access to public infrastructure and nearby employment centers further justifies a higher density designation, aligning with the County's urban planning goals.

The Urban Community category is designed to encourage infill and redevelopment in areas with adequate services that are met by this site. The proposed change will also support increased residential and economic development in a location that has both the infrastructure capacity and access necessary to accommodate future growth.

POLICY I.6.5: The Planning Districts Map and Acreage Allocation Table (Map I-B and Table I(b)) depict the proposed distribution, extent, and location of generalized land uses through the Plan's horizon. Acreage totals are provided for land in each Planning District in unincorporated Lee County. No development orders or extensions to development orders will be issued or approved by Lee County that would allow the acreage totals for residential, commercial or industrial uses contained in Table I(b) to be exceeded. This policy will be implemented as follows: 1. For each Planning District the County will maintain a parcel based database of existing land use. 2. Project reviews for development orders must include a review of the capacity, in acres, that will be consumed by buildout of the development order. No development order, or extension of a development order, will be issued or approved if the acreage for a land use, when added to the acreage contained in the updated existing land use database, exceeds the limitation established by Table I(b) regardless of other project approvals in that Planning District. 3. When updating the Lee Plan's planning horizon, a comprehensive evaluation of the Planning Districts Map and Acreage Allocation Table will be conducted. (Ord. No. 94-29, 98-09, 00-22, 07-13, 10-20, 19-13, 21-09)

The proposed amendment would allow for Light Industrial in addition to the already existing allowable residential and commercial uses. However, the amendment does not create additional capacity but simply allows the existing allowable acreage to be used under a different Future Land Use (FLU) category. Any future development order will be subject to a detailed capacity review per Policy I.6.5 to ensure continued consistency with Table I(b)



TABLE 1(b)
YEAR 2045 ALLOCATIONS

| Future Land Use Category | Planning District | | | | | | | | | | | |
|--|-----------------------------------|-----------------------------------|---------------------------|------------------------|------------------------------------|----------------------------|-----------------------------|--|------------------------------------|---------------------------|-----------------------|------------------------|
| | District 11 Daniels Parkway | District 12 Iona / McGregor | District 13 San Carlos | District 14 Sanibel | District 15 South Fort Myers | District 16 Pine Island | District 17 Lehigh Acres | District 18 Southeast Lee County | District 19 North Fort Myers | District 20 Buckingham | District 21 Estero | District 22 Bashore |
| Residential By Future Land Use Category | | | | | | | | | | | | |
| Intensive Development | - | - | - | - | 801 | 1 | 30 | - | 376 | - | - | - |
| Central Urban | - | 656 | 20 | - | 3,113 | - | 7,362 | - | 2,225 | - | - | - |
| Urban Community | - | 978 | 1,318 | - | 863 | 540 | 17,034 | - | - | 115 | - | - |
| Suburban | - | 2,566 | 2,069 | - | 1,202 | 659 | - | - | 6,387 | - | - | - |
| Outlying Suburban | 1,253 | 438 | - | - | - | 502 | - | - | 406 | - | 90 | - |
| Sub-Outlying Suburban | - | - | 13 | - | - | - | - | - | 145 | 66 | - | 950 |
| Commercial | - | - | - | - | - | - | - | - | - | - | - | - |
| Industrial | - | 3 | 3 | - | 3 | - | - | - | - | - | - | - |
| Public Facilities | - | - | - | - | - | - | - | - | - | - | - | - |
| University Community | - | - | 503 | - | - | - | - | - | - | - | - | - |
| Destination Resort Mixed Use Water Dependent | - | 8 | - | - | - | - | - | - | - | - | - | - |
| Burnt Store Marina Village | - | - | - | - | - | - | - | - | - | - | - | - |
| Industrial Interchange | - | - | - | - | - | - | - | - | - | - | - | - |
| General Interchange | 58 | - | - | - | - | - | - | 8 | 14 | - | - | 20 |
| General Commercial Interchange | - | - | - | - | - | - | - | - | - | - | - | - |
| Industrial Commercial Interchange | - | - | - | - | - | - | - | - | - | - | - | - |
| University Village Interchange | - | - | - | - | - | - | - | - | - | - | - | - |
| New Community | - | - | - | - | - | - | - | - | - | - | - | - |
| Airport | - | - | - | - | - | - | - | - | - | - | - | - |
| Tradeport | - | - | - | - | - | - | - | - | - | - | - | - |
| Rural | 1,573 | - | 99 | - | - | 227 | 14 | - | 454 | 50 | - | 1,387 |
| Rural Community Preserve | - | - | - | - | - | - | - | - | - | 3,517 | - | - |
| Coastal Rural | - | - | - | - | - | 1,338 | - | - | - | - | - | - |
| Outer Island | - | 2 | - | - | - | 55 | - | - | - | - | - | - |
| Open Lands | 80 | - | - | - | - | - | - | - | 30 | - | - | 1,667 |
| Density Reduction/ Groundwater Resource | - | - | - | - | - | - | - | 4,742 | - | - | - | 2,101 |
| Conservation Lands Upland | - | - | - | - | - | - | - | - | - | - | - | - |
| Wetlands | - | - | - | - | - | - | - | - | - | - | - | - |
| Conservation Lands Wetland | - | - | - | - | - | - | - | - | - | - | - | - |
| Unincorporated County Total Residential | 2,964 | 4,650 | 4,024 | - | 5,982 | 3,322 | 24,440 | 4,750 | 10,035 | 3,748 | 90 | 6,325 |
| Commercial | 326 | 774 | 938 | - | 2,012 | 288 | 900 | 318 | 1,121 | 19 | 18 | 72 |
| Industrial | 5 | 198 | 387 | - | 566 | 67 | 218 | 215 | 244 | 4 | 2 | 4 |
| Non Regulatory Allocations | | | | | | | | | | | | |
| Public | 3,214 | 4,898 | 6,364 | - | 5,883 | 4,831 | 20,267 | 17,992 | 10,117 | 3,052 | 653 | 3,351 |
| Active AG | 5 | 13 | 5 | - | - | 2,780 | 35 | 12,000 | 90 | 630 | 4 | 550 |
| Passive AG | 10 | - | 5 | - | - | 70 | 50 | 2,500 | 250 | 2,000 | - | 2,100 |
| Conservation | 1,677 | 9,786 | 2,232 | - | 211 | 15,489 | 1,077 | 41,028 | 1,607 | 382 | 1,465 | 895 |
| Vacant | 20 | 55 | 158 | - | 4 | 2,200 | 14,804 | 2,400 | 1,183 | 850 | 130 | 1,425 |
| Total | 8,221 | 20,374 | 14,114 | - | 14,658 | 29,047 | 61,791 | 81,003 | 24,649 | 10,684 | 2,362 | 14,523 |
| Population Distribution (unincorporated Lee County) | 14,322 | 44,132 | 54,615 | - | 76,582 | 13,431 | 162,245 | 17,369 | 110,722 | 5,951 | 741 | 8,653 |



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, and prevent development patterns where large tracts of land are by-passed in favor of development more distant from services and existing communities. (Ordinance No. 94-30, 00-22)*

POLICY 2.1.1: *Most residential, commercial, industrial, and public development is expected to occur within the designated future urban areas on the Future Land Use Map through the assignment of very low densities to the non-urban categories.*

POLICY 2.1.2: *New land uses will be permitted only if they are consistent with the Future Land Use Map and the goals, objectives, policies, and standards of this plan. (Ordinance No. 00-22)*

POLICY 2.1.5: *Residential and commercial development proposals within the vicinity of existing or proposed commodity movement facilities must demonstrate land use compatibility with these uses during the rezoning process and propose mitigation measures for adverse impacts. (Ordinance No. 99-15, 19-02)*

Objective 2.1 and implementing policy 2.1.1, 2.1.2 and 2.1.5 encourage the use of existing urban areas where services and infrastructure exist to serve new development. The requested Urban Community FLU category is a future urban area with a full range of existing urban services available directly at the subject property. This includes, but not limited to, potable water, sanitary sewer, and roadway capacity. Development in this location provides for a compact and contiguous growth pattern.

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 Section 163.3164(7), F.S.) will be granted only when consistent with the provisions of Sections 163.3202(2)(g) and 163.3180, F.S. and the concurrency requirements in the Land Development Code. (Ordinance No.94-30, 00-22, 17-19)*

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. (Ordinance No. 94-30, 00-22)*

The primary access to the site will be provided by US 41 (S. Tamiami Trail), a State maintained Arterial roadway. Secondary access can be provided to US 41 Service Rd., north of the property. The subject property is located within the Lee County Utilities franchise area for potable water and central sewer with adequate capacity available. Urban services are available at or near the project site. Schools, EMS, Fire, and sheriff's office services are available in the vicinity of the project consistent with objective 2.2 and policy 2.2.1 of the FLU element. Letters of adequacy of service providers are attached in the application.



POLICY 2.2.2: Map 1 of the Future Land Use Map series indicates the uses and density ranges that will ultimately be permitted on a given parcel. However, it is not a guarantee that such densities or uses are immediately appropriate, as the map provides for the county's growth beyond the Lee Plan's planning horizon of 2030. During the rezoning process the Board of County Commissioners will balance the overall standards and policies of this plan with three additional factors:

1. Whether a given proposal would further burden already overwhelmed existing and committed public facilities such that the approval should be delayed until the facilities can be constructed; and
2. Whether a given proposal is for land so far beyond existing development or adequate public facilities that approval should be delayed in an effort to encourage compact and efficient growth patterns; and
3. Whether a given proposal would result in unreasonable development expectations that may not be achievable because of the acreage limitations contained in the Acreage Allocation Table (see Table 1(b)).

In all cases where rezoning is approved, such approval does not constitute a determination that the minimum acceptable levels of service (see Policy 95.1.3) will be available concurrent with the impacts of the proposed development. Such a determination must be made prior to the issuance of Future Land Use II-13 April 2024 additional development permits, based on conditions which exist at that time, as required by Lee County's concurrency management system. (Ord. No. 94-30, 98-09, 10-20, 21-09)

The applicant has analyzed public service availability and confirmed that capacity is available at the present time to serve the uses permitted by the proposed Urban Community FLU map designation. Development of the site with residential uses will not burden any existing public facilities.

OBJECTIVE 2.6: COASTAL ISSUES. Development in coastal areas is subject to the additional requirements found in the Conservation and Coastal Management Element of this plan, particularly those found under Goals 72, 73 and 101. (Ord. No. 18-28).

The property is in the Coastal High Hazard Area which restricts the option to build bonus density to site built affordable housing only.

OBJECTIVE 2.9: CARRYING CAPACITY. Understand the carrying capacity of the future land use map and integrate the concept into planning strategies. (Ordinance No. 07-16)

The modification is to a FLU category which permits residential uses in addition to commercial land uses is addressing the carrying capacity of the Lee Plan FLU map. Providing more residential development capacity to urban services and employment where capacity exists to accommodate this growth is consistent with good urban planning strategies.



GOAL 4: GENERAL DEVELOPMENT STANDARDS. Pursue or maintain land development regulations which protect the public health, safety and welfare, encourage creative site designs and balance development with service availability and protection of natural resources. (Ordinance No. 94-30, 07-15, 17-13)

STANDARD 4.1.1: WATER.

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 6), then the development must be connected to that utility.
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
4. All waterline extensions to new development will be designed to provide minimum fire flows, as well as adequate domestic services as required by Chapter 62-555, FAC.

The subject property is within the Lee County Utilities potable water franchise area as depicted on Lee Plan Map 6 of the Lee Plan. Potable water will be provided from the Green Meadows Water Treatment Plant. An adequacy letter stating that this plant has adequate capacity to provide service to the proposed development is provided as part of this application.

STANDARD 4.1.2: SEWER.

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 7), 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.

The proposed development is within the Forest Utilities sewer franchise area as depicted on Lee Plan Map 7 of the Lee Plan. Wastewater treatment will be provided by the Forrest Utilities. A letter stating that this facility has adequate capacity to provide service to the proposed development has been requested.

STANDARD 4.1.4: ENVIRONMENTAL FACTORS.

1. In any case where there exists or there is the probability of environmentally sensitive areas (as identified by Lee County, the Corps of Engineers, Department of Environmental Protection, South Florida Water Management District, or other applicable regulatory agency), the developer/applicant must prepare an environmental assessment that examines the existing conditions, addresses existing or anticipated environmental problems, and proposes means and mechanisms to protect, conserve, or preserve the environmental and natural resources.



The proposed land use change will have no impact on environmentally sensitive lands. Whether the site is developed with uses under the Urban Community FLU or uses currently permitted within the Suburban FLU. Efforts will be made to preserve and protect any wetlands or environmentally sensitive areas that may be encountered on site.

GOAL 5: RESIDENTIAL LAND USES. To accommodate the projected population of Lee County in the year 2045 in appropriate locations, guided by the Future Land Use Map, and in attractive and safe neighborhoods with a variety of price ranges and housing types. (Ord. No. 94-30, 07-12, 21-09)

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)

There are existing commercial developments offering employment and shopping opportunities all along S. Tamiami Trail/US 41 with restaurants, businesses, and shopping centers. These uses include a Walmart (2.3 miles north), Publix, CVS pharmacy (1.9 Miles south) and Home Depot and Lowes (2.7 mile north). Rayma C Page Elementary School is 1.5± miles from the site, Three Oaks Middle School is 5.1± miles from the site and Island Park High School is 0.6± miles from the site. Lakes Park is within 2.7± miles, San Carlos Community Pool is 4.8± miles, Three Oaks Park is within 6.7± miles, and Koreshan State Park is within 6.5± miles. Lee Tran Routes 240 and 140 run along US 41 at this location with existing bus stop #1156, ±0.1 mile to the south and bus stop # 11560, ±.33 mile to the north. There are existing sidewalks on both sides of US 41, an existing bike lane, existing paved shoulder and proposed shared use path. The requested Map amendment is consistent with Policy 5.1.3

POLICY 5.1.5: Protect existing and future residential areas from any encroachment of uses that are potentially destructive to the character and integrity of the residential environment. Requests for conventional rezonings will be denied in the event that the buffers provided in the LDC, Chapter 10, are not adequate to address potentially incompatible uses in a satisfactory manner. If such uses are proposed in the form of a planned development or special exception and generally applicable development regulations are deemed to be inadequate, conditions will be attached to minimize or eliminate the potential impacts or, where no adequate conditions can be devised, the application will be denied altogether. The LDC will continue to require appropriate buffers for new developments. (Ord. No. 94-30, 99-15, 00-22)

The subject property is located in an area characterized by a mix of existing residential and commercial development. The requested Future Land Use Map amendment from Suburban to Urban Community would allow for infill development that is compatible with the surrounding land use pattern and supported by existing public infrastructure and services.

While both the Suburban and Urban Community Future Land Use Categories allow the same base density of 6 dwelling units per acre, the Urban Community category provides for the potential of additional density through the use of bonus provisions. However, because the subject property is located within the Coastal High Hazard Area (CHHA), Transfer of Development Units (TDUs) are prohibited. Therefore, any increase in density above the base level would require the provision of on-site affordable housing, in accordance with the applicable requirements.



The requested amendment is not anticipated to be destructive to the character or integrity of the existing residential environment. Rather, it supports compatible infill that utilizes available infrastructure while maintaining appropriate safeguards through the Land Development Code, including required buffers and development standards. As no concurrent rezoning is being proposed, this amendment solely pertains to the Future Land Use designation and does not authorize any specific development at this time.

Accordingly, the requested Future Land Use Map amendment is consistent with Policy 5.1.5, as it does not introduce incompatible uses and maintains the integrity of the surrounding residential areas.



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 requirement of 40% open space, all required buffers, landscaping and recreation 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 project includes 40% open space, recreational area and amenities center with additional recreational facilities. Sidewalks are proposed on both sides of the internal roadway and parking areas. 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 with the development.

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 Urban Community land use category is adjacent to and well within a one-quarter mile distance of existing Urban Community FLU.

Impacts on surrounding land uses are minimal due to the similarity of intent and intensity of the uses. The zoning conditions and LDC requirements will adequately address any potential impacts on adjacent uses during Development Order review.

GOAL 37: LEVEL OF SERVICE (LOS) STANDARDS. *Establish and maintain specified transportation LOS standards. (Ordinance No. 98-09, 99-15, 00-08, 17-13)*

POLICY 37.1.3: *Lee County will use the most current Highway Capacity Manual, FDOT Quality Level of Service Handbook, and other best practices to calculate LOS. (Ordinance No. 98-09, 99-15, 07-09, 17-13)*

The proposed land use change will have no adverse impact on the Level of Service of the Adjacent roads. As discussed in the attached traffic analysis, the change in land use is not expected to substantially increase and will likely decrease the number of potential new trips generated by the development at buildout. The proposed development will comply with all transportation requirements of the LDC at time of development order.



GOAL 59: PROTECTION OF LIFE AND PROPERTY. To reduce the hazards to life, health, and property created by flooding due to rainfall in a manner consistent with the community's criteria for the preservation of environmental values and the conservation of natural resources.

OBJECTIVE 59.1: Lee County will continue its efforts in developing a surface water management planning process designed to produce and maintain an up-to-date body of technical information, and, based on that information, the necessary surface water management plans, regulatory mechanisms, and facility proposals that will improve the protection of present and future uses of real property from stormwater flooding, while preserving or enhancing the environmental and natural resource values of both land and water. (Ord. No. 94-30, 00-22)

POLICY 59.1.3: Maintain floodplain regulations in accordance with the most recently adopted Flood Insurance Rate Map (FIRM) and other available sources. (Ord. No. 94-30, 07-12, 18-28)

POLICY 59.1.4: Continue to develop, update, and improve technical information, with the assistance of the USDA Natural Resources Conservation Service, United States Geological Survey, Federal Emergency Management Agency (FEMA), SFWMD, and other agencies, in order to better determine the current flooding risks associated with severe rainfall events. (Ord. No. 91-19, 94-30, 99-15, 02-02)

POLICY 59.1.9: Maintain the floodplain management plan and analyze the flooding problem in the unincorporated areas of Lee County, inventory the flood hazard area, review possible activities to remedy identified flooding problems, select appropriate alternatives, and formulate a schedule for implementation. (Ord. No. 92-35, 94-30, 00-22, 07-12, 18-28)

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. (Ord. No. 94-30, 00-22)

The property is within FEMA flood zone AE 11.00. This will be mitigated by placing fill that the finished floor elevation is one foot above the FEMA base flood elevation as required by Florida Building Code and Chapter 6, LDC. Prior to future development on the property, the applicant will obtain the prerequisite Environmental Resource Permit (ERP) from South Florida Water Management District, and all other applicable state agencies. The request is consistent with Policies 59.1.3, 59.1.4, 59.1.9, 61.3.2 and 61.3.5.

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 – The site will provide Sanitary Sewer, meeting all the requirements in accordance with LDC requirements for development



- b. **Potable Water** – The site will provide Potable Water, meeting all the requirements in accordance with LDC requirements for development
- c. **Surface Water/Drainage Basins** – The property will include controlled discharge into the Hendry Creek system, meeting all requirements of South Florida Water Management District and Lee County at the time of development order.
- d. **Parks, Recreation, and Open Space** – Any proposed development will provide all required Landscaping and Open Space as required by LDC.

GOAL 101: COASTAL AREAS. *Protect human life along with current and future development from the impacts of coastal flooding. Coastal flooding includes, but is not limited to, high tide events, storm surge, flash floods, stormwater runoff, and impacts of sea level rise. (Ord. No. 94-30, 18-28)*

POLICY 101.1.1: *Require that development within the Coastal High Hazard Area be compatible with natural systems, such as, water retention and purification, wildlife habitat, primary productivity, and defense against coastal flooding. (Ord. No. 00-22, 18-28)*

The proposed site plan that will eventually be associated with the amendment will be designed to comply with Policy 101.1.1 of the Lee Plan by demonstrating compatibility with natural systems in the Coastal High Hazard Area. The project will implement a stormwater management system that improves water retention and purification functions relative to existing conditions, including water-quality treatment meeting or exceeding current minimum requirements. Wildlife habitat will be supported through the enhancement and preservation of a portion of the existing wetland with the restoration of native landscaping, and the integration of ecological buffers that maintain habitat connectivity. Finally, the project will strengthen defense against coastal flooding by elevating finished floors consistent with FEMA requirements, constructing flood-resilient infrastructure, and providing on-site stormwater lakes that function as flood storage and surge attenuation features. Together, these measures ensure that the amendment advances the intent of Policy 101.1.1 by maintaining and enhancing the natural systems critical to the resilience of the Coastal High Hazard Area.

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. (Ord. No. 09-17, 16-07, 18-28, 21-09)*

Because the subject property is located within the Coastal High Hazard Area (CHHA), Transfer of Development Units (TDUs) are prohibited. Therefore, the only allowable method for achieving Bonus Density on this site is through the provision of on-site affordable housing, in compliance with the Land Development Code.

Any future request to utilize Bonus Density would be subject to a detailed evaluation to ensure consistency with Policy 101.1.4. This evaluation would confirm the proposed development:



- Does not result in an out-of-county evacuation time exceeding 16 hours for a Category 5 storm event.
- Maintains a 12-hour evacuation time to shelter with adequate shelter capacity;
or
- Provides appropriate mitigation as determined by the Lee County Department of Public Safety.

Because this amendment does not directly authorize additional units or intensity but only establishes the potential for increased intensity through on-site affordable housing, it does not adversely impact hurricane evacuation or shelter capacity. Therefore, the amendment is consistent with Policy 101.1.4

POLICY 101.3.2: Restrict development in the Coastal High Hazard Area to uplands except as needed for the provision of public facilities. (Ord. No. 18-28)

Although the property has wetlands, the area is highly disturbed and of poor quality. The wetlands will be mitigated through SFWMD permit application for prior to Development Order approval. These impacts are necessary to accommodate the water quality and quantity storage requirements through SFWMD.

POLICY 101.3.4: Encourage new residential development, as required by the LDC, to provide continuing information to residents concerning hurricane evacuation and shelters. (Ord. No. 94-30, 00-22, 07-12, 18-28)

A Hurricane Preparedness Plan will be implemented at the time of Development order review.



POLICY 101.3.7: Bonus density for site-built affordable housing development will be considered within the Coastal High Hazard Area. (Ord. No. 18-28)

The subject property is located within the Coastal High Hazard Area (CHHA). In accordance with Lee Plan Policy 101.3.7, bonus density for site-built affordable housing may be considered within the CHHA under specific conditions. The applicant is requesting to utilize bonus density solely through the affordable housing program, consistent with this policy.

The site's characteristics support the use of bonus density for affordable housing in this location, as it is situated within an existing urbanized area and a major employment center, contributing to the job-housing balance. It is adjacent to residential neighborhoods, providing a logical transition from the higher-intensity commercial uses along US 41 to lower-density areas. The property has direct access to US 41, a major arterial roadway, with planned ingress/egress improvements to enhance connectivity. It is located within one mile of Lakes Park, offering convenient access to recreational amenities, and within ¼ mile of a Lee Tran bus stop, supporting multimodal transportation options. Additionally, the site is fully served by existing urban infrastructure, as confirmed by letters of availability submitted with this amendment request.

The proposed density increase aligns with the intent of Policy 101.3.7 by encouraging affordable housing within a strategic, infrastructure-rich location in the CHHA.

GOAL 124: WETLANDS. To maintain and enforce a regulatory program for development in wetlands that is cost-effective, complements federal and state permitting processes, and protects the fragile ecological characteristics of wetland systems. (Ord. No. 94-30, 18-28)

OBJECTIVE 124.1: Protect and conserve the natural functions of wetlands and wetland systems by maintaining wetland protection regulations. (Ord. No. 94-30, 00-22, 18-28)

POLICY 124.1.1: Ensure that development in wetlands is limited to very low density residential uses and uses of a recreational, open space, or conservation nature that are compatible with wetland functions. The maximum density in the Wetlands category is one unit per 20 acres, except that one single family residence will be permitted on lots meeting the standards in Chapter XIII. Owners of wetlands adjacent to Intensive Development, General Interchange, Central Urban, Urban Community, Suburban, New Community, Outlying Suburban, Sub-Outlying Suburban, and Rural future land use categories may transfer dwelling units from preserved freshwater wetlands to developable contiguous uplands under common ownership at the same underlying density as permitted for those uplands. (Ord. No. 94-30, 00-22, 10-20, 18-06, 18-28, 19-13, 21-09, 22-25)

The existing onsite wetland is 4.26 acres but is infested with Melaleuca and is of very poor quality. The applicant is proposing to mitigate 2.7 acres of the wetland and enhance the remaining 1.6 acres by removing the existing Melaleuca and revegetating the wetland with native plants. The preserved portion of the wetland will be buffered from the development.

POLICY 125.1.2: New development and additions to existing development must not degrade surface and ground water quality. (Ord. No. 00-22, 18-28)



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. (Ord. No. 00-22, 18-28)*

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

POLICY 126.1.4: *Development designs must provide for maintaining or improving surface water flows, groundwater levels, and lake levels at or above existing conditions. (Ord. No. 00-22, 18-28)*

The project will be designed in accordance with the latest SFWMD regulations in effect at time of permitting which ensures that water levels are set at the current levels of both onsite and offsite, and that the project provides the required water quality and water quantity attenuation.

Conclusion

The Future Land Use change from Suburban to Urban Community will allow for a infill development with residential uses and supportive neighborhood commercial uses. The property is located within a mature developed area of Lee County as evidence by surrounding land use, densities, and intensities. The site is in proximately to goods, services, recreation, and public infrastructure. Flexibility in the uses for the subject site will not provide for additional intensity, nor provide any new deficiencies or impact the public health, safety or welfare, only residential density can increase with bonus density, with the change from Suburban to Urban Community. Urban Community will continue to protect the natural resources and environmental features of the property through compliance with the Land Development Code and will efficiently utilize the existing public facilities and services in the area. The change will allow continued support of residential development within an appropriate location, thereby accommodating growth in areas intended by Lee County Comprehensive Plan. This narrative confirms that the proposed request from Suburban to Urban Community is consistent with the LeePlan and Land Development Code for the future land use change.

Quattrone &
Associates, Inc.



US 41 Pugliese Multifamily

Existing and Future Public Facilities Impacts Analysis
Exhibit M15

Potable Water and Sanitary Sewer

The subject property is within the Lee County Utilities (LCU) potable water franchise area as depicted on Maps 4A and 4B of the Lee Plan. LCU owns and maintains existing potable water and wastewater lines along the adjacent streets. Green Meadows Treatment Plant will provide potable water service to the proposed development while Forest Utilities will provide wastewater service.

Lee County utilities have sufficient capacity to provide water service and Forest Utilities has sufficient capacity to provide sewer service at buildout for both the existing Suburban land use as well as the proposed Urban Community land use to include multi-family residential units. As similar uses could be developed in both land use categories, the difference in the expected water and sewer demand would be only due to the addition of the residential units and is summarized below.

Per F.A.C. 64E-6, residential/commercial:

Residential:

- 100 gallons per day per 1-bedroom unit (750 sf or less of building area)
- 200 gallons per day per 2-bedroom unit (751-1200 or less of building area)
- 300 gallons per day per 3-bedroom unit (1201-2250 sf or less of building area)
- 400 gallons per day per 4- bedroom unit (2251-3300 sf or less of building area)

(290) 2-bedroom multi-family residential units = 58,000 gpd. The proposed project can expect an average potable water and sanitary sewer demand of 58,000 GPD.

Water and sewer demand for the balance of the property would remain unchanged whether in the Suburban or Urban Community land use.

According to the 2024 Lee County Concurrency Report, LCU's interconnected water distribution system is permitted with a capacity of 54.4 million gallons per day (MGPO) and is projected planned future to operate at 46.7 MGPO. Therefore, there is sufficient capacity within the existing water distribution system to serve the project at build-out.

This project is in the Forest Utilities Franchise and is not mentioned in the concurrency report. However, a letter of availability submitted with this application states Forest Utilities has sufficient capacity.

Surface Water/Drainage Basins



The existing site consists of vacant undisturbed parcels. There is an existing stormwater swale along ROW of S. Tamiami Trail. The existing stormwater runoff sheet flows generally to the south into Hendry Creek flow way. The property has permitted SFWMD with existing Master System Environmental Resource Permit # 36-00161-S Application 080804-03 serving the combined 13.20-acre parcel.

The subject site is currently in a FEMA Zone AE-EL11 per map panel 12071C0438H, which has an established base flood elevation of 11" NAVD.

The Lee Plan Policy 95.1.3 establishes regulatory standards and non-regulatory standards for public facilities and states as follows:

Stormwater Management Facilities LOS: The existing surface water management system in the unincorporated areas of the county will be sufficient to prevent the flooding of designated evacuation routes (see Map 3J) from the 25-year, 3-day storm event (rainfall) for more than 24 hours.

The 2024 Concurrency Report confirms that none of the evacuation routes in the studied watersheds are anticipated to be flooded for more than 24 hours, and that new developments that receive approval from the South Florida Water Management District and comply with standards in Florida Administrative Code Chapter 62- 330 will be deemed concurrent with the Lee Plan's surface water management LOS. The US41 Pugliese Multi-family project will receive approval for an Environmental Resource Permit from the South Florida Water Management District and, as such, will be consistent with the surface water management Level of Service standards of the Lee Plan.

The change in land use from Suburban to Urban Community will change the developable area. The proposed development will include a surface water management system which will provide both stormwater attenuation and water quality treatment. The surface water management system will include controlled discharge into the Hendry Creek system, meeting all requirements of South Florida Water Management District and Lee County at the time of development order.

The change in land use will have no impacts on the design or function of the surface water management system, drainage basin, discharge rates, nutrient loadings, water quality or flood zone.

Parks, Recreation and Open Space

Regional Parks:

The Lee County Public Facilities Level of Service and Concurrency Report 2024 indicates a total of 7,127 acres of existing regional parks operated by county, local, state, and federal governments within Lee County. The capacity required to meet The Lee Plan Policy 95.1.3 non-regulatory level of-service standard of 6 acres per 1,000 total seasonal county population is equal to:

$$945,000 \text{ [seasonal county population]} \times (6 \text{ acres}/1,000 \text{ population}) = 5,670 \text{ acres}$$

The Bureau of Economic and Business Research (BEBR) Projections of Florida Population by County, 2025-2050, with Estimates for 2023 provided a medium projected population of 1,075,100



for Lee County in 2050. This would require 6,450 acres to meet the level of service standard. There is more than adequate existing Regional Park acreage in Lee County to meet the needs of the project.

Community Parks

The Lee County Public Facilities Level of Service and Concurrency Report 2024 indicates a total of 829.3 acres of existing community parks operated by Lee County or jointly operated with The School District of Lee County within Lee County. The capacity required to meet the Lee Plan Policy 95.1.3 non-regulatory level of-service standard of 0.8 acres per 1,000 total permanent county population is equal to:

$$389,000 \text{ [permanent unincorporated county population]} \times (0.8 \text{ ac/1,000 population}) = 311 \text{ ac}$$

The existing inventory of community parks within Lee County meets the community park level of service standard in the County for the year 2023 and will continue to do so at least through the next five years. The level of service standard increased from 743.6 acres in 2023 to 829.3 acres in 2024 which represents here is more than adequate existing Community Park acreage in Lee County to meet the needs of the project.

Public Schools

The subject property is within the South Zone, Lee Plan Policy 95.1.3 provides that Public Schools Facilities LOS standards for Elementary Schools, Middle Schools, High Schools and Special Purpose Facilities is based upon Permanent Florida Inventory School Houses (FISH) capacity and is 100% as adjusted by the School Board annually to account for measurable programmatic changes.

According to the Lee County Public Facilities Level of Service and Concurrency Report 2024, the South Zone showed an available capacity of 252 elementary school seats, 63 middle school seats, and 255 high school seats. The letter of review and recommendation has been requested from the School District of Lee County.



Lee County
Southwest Florida

LEE COUNTY UTILITIES
REQUEST FOR LETTERS OF AVAILABILITY

DATE: SEPTEMBER 9, 2025

TO: DCAP STAFF
Lcudcap@leegov.com

FROM: SHARON HRABAK

FIRM: QUATTRONE & ASSOCIATES, INC

ADDRESS: 4301 VERONICA SHOEMAKER BLVD

ADDRESS: FORT MYERS, FL 33916 -

PHONE#: (239)936-5222 FAX: () -

E-MAIL ADDRESS: SHARON@QAINC,NET

PROJECT NAME: PUGLIESE MULTI-FAMILY

PREVIOUS PROJECT NAME(S):

STRAP NUMBER(S): 01-46-24-00-00004.2000. 01-46-24-00-00004.2020

PRIOR STRAP NUMBER(S) (IF ANY):

LOCATION/SITE ADDRESS: ADDRESS UNDETERMIED

PURPOSE OF LETTER:

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

PLANNED USE:

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

PLANNED # OF COMMERCIAL/INDUSTRIAL BUILDINGS: _____ TOTAL SQUARE FOOTAGE: _____

RESIDENTIAL UNITS: SINGLE-FAMILY: _____ MULTI-FAMILY: 290

AVERAGE ESTIMATED DAILY FLOW (GPD): 58,000 (WATER WASTE-WATER) (GPD): _____ REUS

PLEASE SHOW CALCULATION USED TO DETERMINE AVERAGE ESTIMATED DAILY FLOW (GPD) PER CRITERIA SET FORTH IN LEE COUNTY UTILITIES DESIGN MANUAL: 4-E (132 UNIT AVG 2 BED

100 Gallons Per Day Per 1-Bedroom Unit (750 Sf Or Less Of Building Area)

200 Gallons Per Day Per 2-Bedroom Unit (751-1200 Or Less Of Building Area)

300 gallons per day per 3-bedroom unit (1201-2250 sf or less of building area)

Please e-mail the completed form to Lcudcap@leegov.com.

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



Sharon Hrabak

From: Tim Pugh <Tepugh@source-inc.com>
Sent: Tuesday, April 22, 2025 11:51 AM
To: Sharon Hrabak
Cc: James Elliott; Doris Swor; Mitch Gilbert; Forest Utilities
Subject: RE: Pugliese M/F
Attachments: Checklist for New Systems Submittal and Acceptance.pdf; Pugliese Service Availability Letter.pdf

EXTERNAL SENDER

Sharon,

Attached is the requested service availability letter, along with a checklist for new systems submittal and acceptance.

Thank you.

Timothy E. Pugh, P.E.
Vice President

[Source, Inc](#)

1334 Lafayette Street
Cape Coral, Florida 33904
Phone: (239) 549-2345
Fax: (239) 549-6779

tepugh@source-inc.com

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From: Sharon Hrabak <Sharon@qainc.net>
Sent: Monday, April 14, 2025 2:45 PM
To: James Elliott <jpellott@source-inc.com>; Tim Pugh <Tepugh@source-inc.com>
Cc: forrestu@aol.com
Subject: Pugliese M/F

Good afternoon, Tim and Jim,

We are submitting to Lee County A Comp Plan Amendment for a proposed housing project on 01-46-24-00-00004.2000, 01-46-24-00-00004.2020. CAN YOU PLEASE PROVIDE US WITH A LETTER OF AVAILABILITY?

The proposed is for up to 290 units , average estimated daily floe 58,000 gpd
Based on 200 Gallons Per Day Per 2-Bedroom Unit (751-1200 Or Less of Building Area)

Please let us know if you need any other information from us.

Thank you,

Sharon Hrabak



4301 Veronica Shoemaker Blvd.
Fort Myers, Florida 33916
P: 239-936-5222 | F: 239-936-7228
sharon@gainc.net | www.gainc.net



Engineers, Planners & Development Consultants

4301 Veronica Shoemaker Blvd. Fort Myers, FL
239.936.5222 | QAINC.net | f 239.936.7228

April 14, 2025

Stan Nelson, Director of Planning & Research
Patrol Special Operations
Lee County Office of the Sherriff
14750 Six Mile Cypress Parkway
Fort Myers, FL 33912
SNelson@sheriffleefl.org

Re: Request for Letter of Service Availability
S. Tamiami Trail
Comprehensive Plan Amendment
Strap # 01-46-24-00-00004.2000; 01-46-24-00-00004.2020

Dear Major Chris Reeves,

We are in the process of preparing an application for a Small-Scale Comprehensive Plan Amendment for the referenced parcels located west of US 41 and North of Forrest Blvd. The requested amendment would change the current Future Land use from Suburban to Urban Community Classification (as shown on Map I of the Lee County Comp Plan) for the above listed parcels with 13.20 combined acreage.

The primary intent of the amendment is to accommodate a 290 unit multi-family residential community on a portion of the property. The land uses are very similar with the exception, Urban Community is intended to better accommodate higher density range. Although the proposed land use would be slightly more intensive from a development, traffic, utility and public service needs standpoint, there is adequate infrastructure to serve the project.

The application requires we provide a Letter of Service Availability from all agencies determining the adequacy/ provision of existing/proposed support facilities. If you could please provide us with a letter of availability for services to the referenced parcels at your earliest convenience, we would greatly appreciate it.

If you have any questions, or require additional information, please do not hesitate to contact me at 239-936-5222 or sharon@qainc.net

Sincerely,
QUATTRONE & ASSOCIATES, INC.

Sharon Hrabak
Permitting Manager



Engineers, Planners & Development Consultants

4301 Veronica Shoemaker Blvd. Fort Myers, FL
239.936.5222 | QAINC.net | f 239.936.7228

April 14, 2025

David Cambareri, Chief
San Carlos Park Fire Department
19591 Ben Hill Griffin Pwky.
Fort Myers, FL 33905
Cambareri@SanCarlosFire.org

Re: Request for Letter of Service Availability
S. Tamiami Trail
Comprehensive Plan Amendment
Strap # 01-46-24-00-00004.2000; 01-46-24-00-00004.2020

Dear Chief Cambareri:

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If you have any questions, or require additional information, please do not hesitate to contact me at 239-936-5222 or sharon@qainc.net

Sincerely,
QUATTRONE & ASSOCIATES, INC.

Sharon Hrabak
Permitting Manager



Engineers, Planners & Development Consultants

4301 Veronica Shoemaker Blvd. Fort Myers, FL
239.936.5222 | QAINC.net | f 239.936.7228

April 14, 2025

Ms. Shana Heidig
LeeTran Headquarters
3401 Metro Parkway
Fort Myers, FL 33901
sheidig@leegov.com

Re: Request for Letter of Service Availability
S. Tamiami Trail
Comprehensive Plan Amendment
Strap # 01-46-24-00-00004.2000; 01-46-24-00-00004.2020

Dear Ms. Heidig,

We are in the process of preparing an application for a Small-Scale Comprehensive Plan Amendment for the referenced parcels located west of US 41 and North of Forrest Blvd. The requested amendment would change the current Future Land use from Suburban to Urban Community Classification (as shown on Map I of the Lee County Comp Plan) for the above listed parcels with 13.20 combined acreage.

The primary intent of the amendment is to accommodate a 290-unit multi-family residential community on a portion of the property. The land uses are very similar with the exception, Urban Community is intended to better accommodate higher density range. Although the proposed land use would be slightly more intensive from a development, traffic, utility and public service needs standpoint, there is adequate infrastructure to serve the project.

The application requires we provide a Letter of Service Availability from all agencies determining the adequacy/ provision of existing/proposed support facilities. If you could please provide us with a letter of availability for services to the referenced parcels at your earliest convenience, we would greatly appreciate it.

If you have any questions, or require additional information, please do not hesitate to contact me at 239-936-5222 or sharon@qainc.net

Sincerely,
QUATTRONE & ASSOCIATES, INC.

Sharon Hrabak
Permitting Manager



Engineers, Planners & Development Consultants

4301 Veronica Shoemaker Blvd. Fort Myers, FL
239.936.5222 | QAINC.net | f 239.936.7228

April 14, 2025

Mr. Joel Deguzman
The School District of Lee County
2855 Colonial Boulevard
Fort Myers, Florida 33966
joelsd@leeschools.net

Re: Request for Letter of Service Availability
S. Tamiami Trail
Comprehensive Plan Amendment
Strap # 01-46-24-00-00004.2000; 01-46-24-00-00004.2020

Dear Mr. Gemelli,

We are in the process of preparing an application for a Small-Scale Comprehensive Plan Amendment for the referenced parcels located west of US 41 and North of Forrest Blvd. The requested amendment would change the current Future Land use from Suburban to Urban Community Classification (as shown on Map I of the Lee County Comp Plan) for the above listed parcels with 13.20 combined acreage.

The primary intent of the amendment is to accommodate a 290 unit multi-family residential community on a portion of the property. The land uses are very similar with the exception, Urban Community is intended to better accommodate higher density range. Although the proposed land use would be slightly more intensive from a development, traffic, utility and public service needs standpoint, there is adequate infrastructure to serve the project.

The application requires we provide a Letter of Service Availability from all agencies determining the adequacy/ provision of existing/proposed support facilities. If you could please provide us with a letter of availability for services to the referenced parcels at your earliest convenience, we would greatly appreciate it.

If you have any questions, or require additional information, please do not hesitate to contact me at 239-936-5222 or sharon@qainc.net

Sincerely,
QUATTRONE & ASSOCIATES, INC.

Sharon Hrabak
Permitting Manager



US 41 Pugliese Multifamily

Justification of Proposed Amendment
Exhibit M20

The applicant is requesting an amendment to Lee Plan Map I, Page I Future Land Use map to redesignate ±13.20-acre from Suburban to the Urban Community Future Land Use. The subject parcels are located on the west side of US 41 (S. Tamiami Trail) approximately 1.0 mile north of Alico Road. The parcels are undisturbed vacant. The property currently is within the Suburban Future Use Category and zoned C-1.

The applicant proposes to amend the future Land Use Map of the Lee Plan to redesign approximately 13.20 acres from the Suburban Future Land Use Category to the Urban Community Future Land Use Category. The property owner(s) desires to develop a multi-family community.

Development of residential uses on the subject property represents one of the desirable and economically viable land uses in this location due to the proximity to US-41(S. Tamiami Trail). Exhibit M5 identifies the various existing and planned land uses that about the site.

The Lee Plan encourages development of residential areas that are heavily settled and that have the greatest range and highest levels of public services to accommodate the projected population. The request is based on key differences in allowable density, intensity, and locational characteristics, and is justified for the following reasons:

| Category | Urban Community | Suburban |
|------------------------|---|---|
| General Character | Mixed-use, relatively intense residential and commercial | Predominantly residential; fringe of urban areas |
| Primary Uses | Residential, commercial, public/quasi-public, limited light industrial | Residential only; limited to protect neighborhood character |
| Industrial Uses | Limited light industrial permitted | Not allowed |
| Mixed-Use Development | Encouraged, where appropriate | Not typical |
| Standard Density Range | 1 to 6 dwelling units per acre (du/acre) | 1 to 6 du/acre |
| Maximum Density | 10 du/acre standard max Up to 15 du/acre with Greater Pine Island TDUs | 8 du/acre max only with Greater Pine Island TDUs |
| Other Bonus Densities | Typically Allowed (via TDU program and policy) | Not allowed |
| Other Bonus Density | on-site affordable housing may qualify for limited bonus | Not allowed; |
| Public Services | Existing services must be maintained or expanded as development occurs | No specific mention; implies lower infrastructure demands |



| Category | Urban Community | Suburban |
|--------------------|---|--|
| Proximity/Location | Central or urban areas; similar to Central Urban | Outskirts or fringe areas near Urban Community zones |
| Development Intent | Supports growth, redevelopment, and higher intensity land use | Supports neighborhood preservation and moderate growth |

In Conclusion, the proposed amendment is not a speculative upzoning request, but rather a strategic change aligned with current development patterns and infrastructure capacity. The Urban Community designation better reflects the existing and planned character of this portion of the US-41 corridor and supports the County's long-term planning objectives. In contrast, maintaining the Suburban designation would underutilize a well-located, infrastructure-ready site and limit the ability to provide housing consistently with demand and policy direction.

Legal Description

Subject Parcel Description:



A TRACT OR PARCEL OF LAND BEING PART OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER OF SECTION 1, TOWNSHIP 46 SOUTH, RANGE 24 EAST, LEE COUNTY, FLORIDA, ALSO BEING IN GOVERNMENT LOT 2, MORE PARTICULARLY DESCRIBED AS FOLLOWS:

COMMENCING AT THE NORTHWEST CORNER OF THE NORTHEAST QUARTER OF SAID SECTION 1; THENCE SOUTH 00 DEGREES 27 MINUTES 15 SECONDS EAST, ALONG THE WESTERLY LINE OF THE NORTHWEST QUARTER OF SAID NORTHEAST QUARTER, A DISTANCE OF 1321.39 FEET TO THE SOUTHWEST CORNER OF THE NORTH HALF OF THE NORTHEAST QUARTER OF SAID SECTION 1 AND THE **POINT OF BEGINNING**; THENCE NORTH 00 DEGREES 27 MINUTES 15 SECONDS WEST, ALONG SAID WESTERLY LINE, A DISTANCE OF 891.50 FEET; THENCE NORTH 89 DEGREES 07 MINUTES 23 SECONDS EAST, A DISTANCE OF 505.91 FEET TO THE WESTERLY RIGHT-OF-WAY LINE OF U.S. 41 - TAMAMIAMI TRAIL (ALSO STATE ROAD 45 AS DEPICTED IN PLANS FOR SECTION 12010-2503); THENCE SOUTH 31 DEGREES 35 MINUTES 06 SECONDS EAST, ALONG SAID RIGHT OF WAY LINE, A DISTANCE OF 735.85 FEET TO THE NORTHERLY BOUNDARY OF A TRACT OF LAND DESCRIBED IN INSTRUMENT NUMBER 2012000230678, PUBLIC RECORDS OF LEE COUNTY, FLORIDA; THENCE ALONG THE BOUNDARIES OF SAID TRACT FOR THE FOLLOWING FOUR (4) COURSES: SOUTH 89 DEGREES 04 MINUTES 30 SECONDS WEST, A DISTANCE OF 102.74 FEET; 2) THENCE SOUTH 66 DEGREES 25 MINUTES 56 SECONDS WEST, A DISTANCE OF 210.69 FEET; 3) THENCE SOUTH 86 DEGREES 15 MINUTES 22 SECONDS WEST, A DISTANCE OF 148.24 FEET; 4) THENCE SOUTH 00 DEGREES 25 MINUTES 08 SECONDS EAST, A DISTANCE OF 169.66 FEET TO THE SOUTHERLY LINE OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER OF SAID SECTION 1; THENCE SOUTH 89 DEGREES 04 MINUTES 30 SECONDS WEST, ALONG SAID SOUTHERLY LINE, A DISTANCE OF 441.72 FEET TO THE **POINT OF BEGINNING**.

SAID PARCEL CONTAINS 575,162 SQUARE FEET, 13.20 ACRES (MORE OR LESS).

BEARINGS ARE BASED ON THE WESTERLY LINE OF THE NORTHWEST QUARTER OF THE NORTHEAST QUARTER OF SECTION 1, BEING SOUTH 00 DEGREES 27 MINUTES 15 SECONDS EAST.

NOT VALID WITHOUT THE ATTACHED SHEET 2 OF 2 SKETCH OF DESCRIPTION.

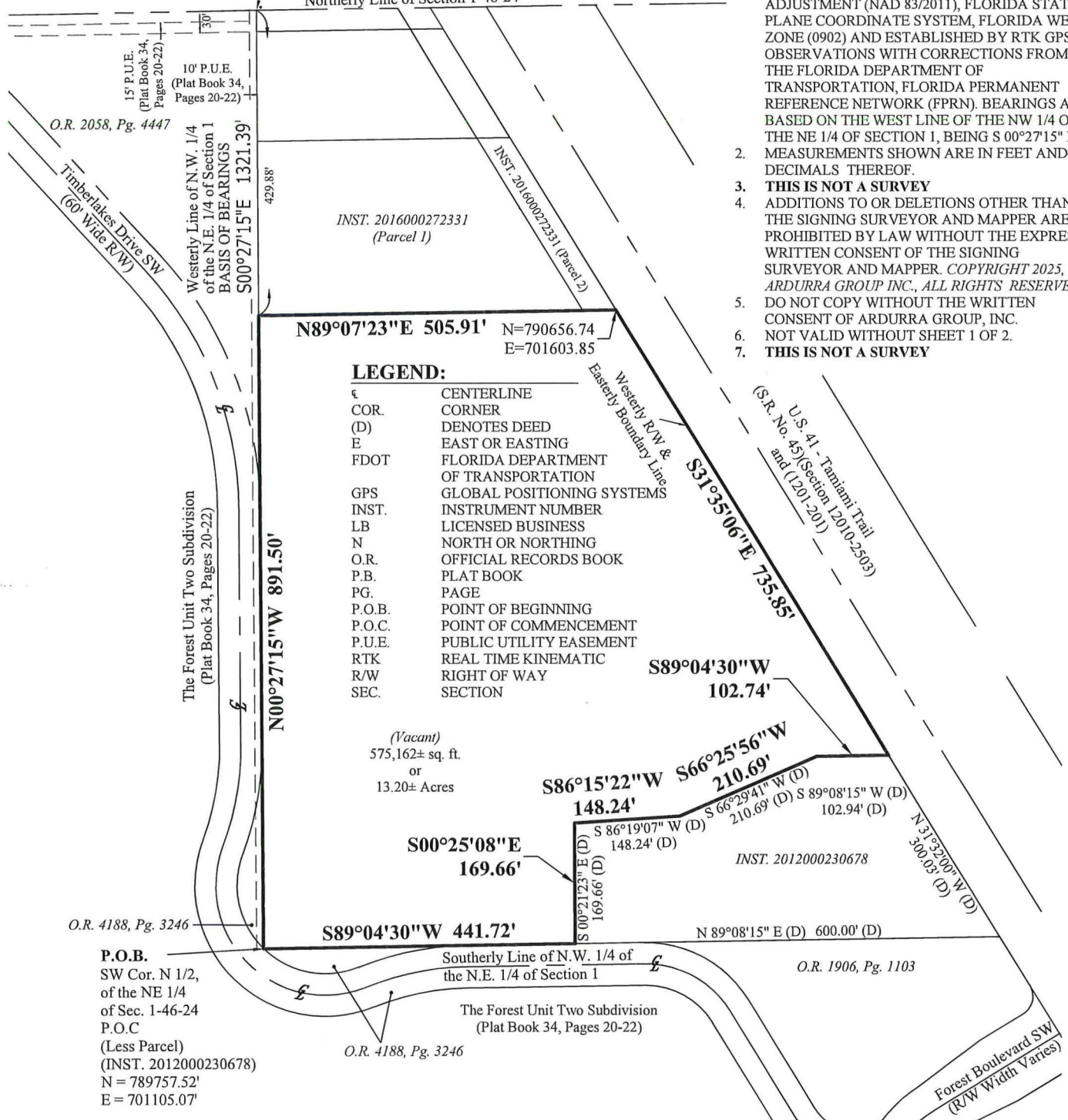
| | | |
|---|--|--|
| THIS IS NOT A SURVEY | Description to Accompany Sketch Subject Parcel <i>A Tract of Land lying in Section 1, Township 46 South, Range 24 East Lee County, Florida</i> | I hereby certify that, to the best of my knowledge and belief, the sketch and description represented hereon, made under my direction on September 3, 2025 is in accordance with Standards of Practice as set forth by the Florida Board of Professional Surveyors & Mappers in Chapter 5J-17, Florida Administrative Code, pursuant to Section 472.027 Florida Statutes. |
| <i>Sheet 1 of 2</i> |  <p style="font-size: x-small;">324 Nicholas Parkway W, Unit A Cape Coral, Florida 33991 Phone: (239) 673-9541 www.Ardurra.com License #LB-2610</p> |  <p style="font-size: small;">Digitally signed by Cameron M Harmon Date: 2025.09.03 14:19:06 -05'00'</p> |
| JOB # 25-0700 PREPARED FOR: LAND AMERICA, LLC SECTIONS 1, TOWNSHIP 46S, RANGE 24E | CAMERON M. HARMON (FOR THE FIRM) FLORIDA PROFESSIONAL SURVEYOR & MAPPER NO.7483 NOT VALID WITHOUT THE SIGNATURE AND THE ORIGINAL RAISED SEAL OR DIGITAL SIGNATURE OF A FLORIDA LICENSED SURVEYOR AND MAPPER | |

Sketch

SURVEY NOTES:

1. BEARINGS AND COORDINATES SHOWN HEREON ARE IN REFERENCE TO THE NORTH AMERICAN DATUM OF 1983, 2011 ADJUSTMENT (NAD 83/2011), FLORIDA STATE PLANE COORDINATE SYSTEM, FLORIDA WEST ZONE (0902) AND ESTABLISHED BY RTK GPS OBSERVATIONS WITH CORRECTIONS FROM THE FLORIDA DEPARTMENT OF TRANSPORTATION, FLORIDA PERMANENT REFERENCE NETWORK (FPRN). BEARINGS ARE BASED ON THE WEST LINE OF THE NW 1/4 OF THE NE 1/4 OF SECTION 1, BEING S 00°27'15" E.
2. MEASUREMENTS SHOWN ARE IN FEET AND DECIMALS THEREOF.
3. **THIS IS NOT A SURVEY**
4. ADDITIONS TO OR DELETIONS OTHER THAN THE SIGNING SURVEYOR AND MAPPER ARE PROHIBITED BY LAW WITHOUT THE EXPRESS WRITTEN CONSENT OF THE SIGNING SURVEYOR AND MAPPER. *COPYRIGHT 2025, ARDURRA GROUP INC., ALL RIGHTS RESERVED.*
5. DO NOT COPY WITHOUT THE WRITTEN CONSENT OF ARDURRA GROUP, INC.
6. NOT VALID WITHOUT SHEET 1 OF 2.
7. **THIS IS NOT A SURVEY**

P.O.C.
NW COR, NE 1/4
SEC. 1-46-24
Northerly Line of Section 1-46-24



LEGEND:

| | |
|--------|---|
| € | CENTERLINE |
| COR. | CORNER |
| (D) | DENOTES DEED |
| E | EAST OR EASTING |
| FDOT | FLORIDA DEPARTMENT OF TRANSPORTATION GLOBAL POSITIONING SYSTEMS |
| GPS | GPS |
| INST. | INSTRUMENT NUMBER |
| LB | LICENSED BUSINESS |
| N | NORTH OR NORTHING |
| O.R. | OFFICIAL RECORDS BOOK |
| P.B. | PLAT BOOK |
| PG. | PAGE |
| P.O.B. | POINT OF BEGINNING |
| P.O.C. | POINT OF COMMENCEMENT |
| P.U.E. | PUBLIC UTILITY EASEMENT |
| RTK | REAL TIME KINEMATIC |
| R/W | RIGHT OF WAY |
| SEC. | SECTION |

(Vacant)
575,162± sq. ft.
or
13.20± Acres

Sketch to Accompany Description
Subject Parcel
*A Tract of Land lying in Section 1,
Township 46 South, Range 24 East
Lee County, Florida*

THIS IS NOT A SURVEY



ARDURRA
COLLABORATE. INNOVATE. CREATE.

324 Nicholas Parkway W, Unit A
Cape Coral, Florida 33991
Phone: (239) 673-9541
www.Ardurra.com
License #LB-2610



See Sheet 1 of 2 for Signature and Seal

SHEET 2 OF 2

JOB # 25-0700 | PREPARED FOR: LAND AMERICA, LLC

SECTIONS 1, TOWNSHIP 46S, RANGE 24E