

Exhibit C

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Daniels Parkway South MPD
Administrative Amendment
 Narrative of Request

The Daniels Creek project is a 1,233-acre planned development located at the southeast corner of SR 82 and Daniels Parkway in Lee County. Zoning resolution Z-23-022 approved a Mixed Use Planned Development (“MPD”) for approximately 1,233 acres to permit 1,600 dwelling units and 350,000 square feet of commercial floor area. The approved zoning resolution found that the subject property is consistent with the surrounding uses and has the ability to connect to urban services.

The requested amendment is to Tract 2 which includes the Emergency Services and smaller commercial development area south of the shared access to the MPD off of Daniels Parkway. This portion of the overall project is within the Central Urban Future Land Use (“FLU”) and Lehigh Acres Planning Community. The application seeks to amend the Master Concept Plan (“MCP”) to decrease the acreage allocated to the Emergency Services parcel and increase the acreage of the Commercial parcel. The overall square footage of commercial, requested uses, and deviations are not being amended as part of this application.

I. Future Land Use & Planning Community

Policy 1.1.3 describes the Central Urban FLU “areas [that] are already the most heavily settled and have, or will have, the greatest range and highest levels of public services. Residential, commercial, public and quasi-public and limited light industrial land uses will continue to predominate...” this category. The existing approved schedule of uses for the MPD includes residential, emergency services, and commercial uses consistent with this policy. Of the entire 1,233-acre project, 84.52 acres are within the Central Urban FLU and Lehigh Acres Community Planning Area with 44.10-acres currently identified for commercial uses.

As an integrated mixed use project, the portion of the Daniels South MPD within the Lehigh Acres Community Planning Community includes multi-family units and non-residential uses. The 84.25-acres within the Lehigh Acres Planning Community is also within a Community Mixed Use Activity Center that is less than a half a mile from Timber Creek residential homes, Gateway, and existing platted single family lots within Lehigh Acres. The 44-acre commercial tracts identified within the Daniels South MPD were, and continue to be, specifically designed to support and complement the residents of the Timber Creek and Daniels Parkway South communities as well as the adjacent residents in Gateway and Lehigh Acres.

As identified on Map 2-B, the Community Mixed Use Activity Center is ±343 acres within the Central Urban and Urban Community FLU categories. There are two commercial

developments within the activity center, Gateway MarketPlace (the 40 acre MPD in Timber Creek) and the current 44 acre commercial tracts within the Daniels Parkway South MPD. To date, only the Timber Creek RPD has been developed, however, the Gateway MarketPlace and the residential portion of the Daniels South MPD have zoning approval and Development Orders have been submitted.

	Total	Residential	Non-Residential
Central Urban	241.7 Acres	103.6 Acres	151.02 Acres

Table 1. Community Mixed Use Activity Center

At approximately 240 acres, a **maximum** of 50% (120 acres) of the land area within the Central Urban FLU is permitted to be residential. The existing and potential residential development within this FLU category is approximately 103.6 acres, within the maximum 120 acres of residential uses permitted by Table1(c).

A **minimum** of 50% of the land area (120 acres) is permitted to be for non-residential development (which includes commercial, agricultural and vacant land uses). The proposed Daniels Parkway South MCP demonstrates 46.7 acres of commercial. When combined with the approved commercial area of the Timber Creek MPD and other non-residential land area, 151.02 acres are available for non-residential development. The redesigned Master Concept Plan and associated acreages are within the permitting minimums and maximums for residential and non-residential uses and therefore is consistent with Table 1(c).

II. Current MPD Approval

The approved MCP for the Emergency Services and Commercial tract is approximately 2.5 acres of commercial at the proposed shared access on Daniels Parkway for the Daniels Parkway South MPD. The Emergency Services parcel was coordinated with the Lehigh Acres Fire District due to the increase in residential units that would occur from the Timber Creek and Daniels Parkway South developments.

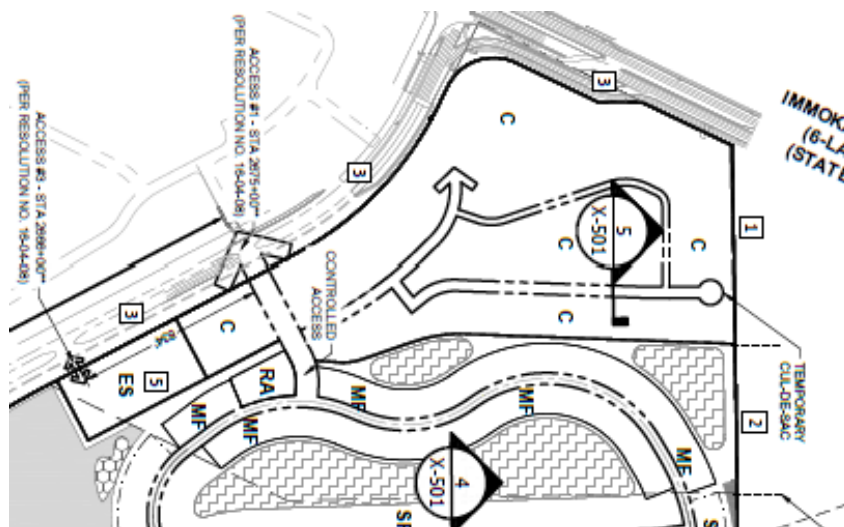
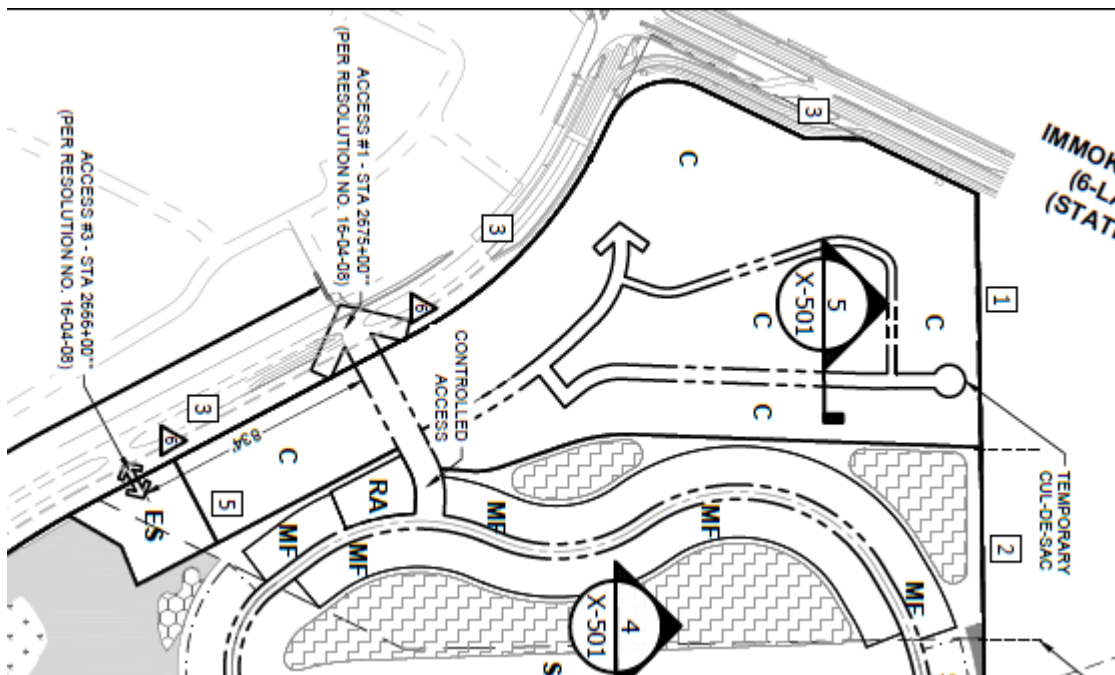


Figure 1. Existing Commercial Tract Design**III. Amendment Request**

This Administrative Amendment (“ADD”) is submitted to reduce the acreage allocated to the Emergency Services (“ES”) tract and increase the acreage allocated to the commercial portion of Tract 2. The property owner has coordinated with the Lehigh Acres Fire District (“LAFD”) and received a letter that the land donation of the ES should not exceed 2.4 acres. (See **Attachment 1**)

The adjustment of the tract line to reflect the request of the LAFD will increase the acreage of the adjacent commercial tract by ± 2.6 acres to provide a total of ± 5.1 acres of commercial in Tract 2. Accordingly, the open space calculations are proposed to be increased to reflect the total commercial acreage. It should be noted that while the MCP is proposed to have additional acreage available for commercial development, this application does not propose an increase in commercial square footage, uses or deviations.

**Figure 2. Proposed ES & Commercial Tract Design****IV. Conclusions and Findings**

The requested Administrative Amendment seeks to adjust the tract line of the ES and Commercial Tract 2 on the Master Concept Plan approved by Z-23-022. The Director of the Department of Community Development is permitted to approve an administrative amendment to a planned development per LDC Section 34-174(i) provided the following findings are made.

i. Does not increase height, density or intensity of the development

The request does not alter the height, density or intensity of the development. The maximum commercial square footage remains at 350,000 square feet and the permitted list of commercial uses is not proposed to be altered from Z-23-022.

ii. Does result in substantial underutilization of public resources and public infrastructure committed to support the development.

The desired revisions to the MCP do not result in the underutilization of public resources and infrastructure. All public services are in place to serve the development and the modification of the MCP reflects a request from the Lehigh Acres Fire District to improve a public service.

iii. Does not result in a reduction of total open space provided on the Master Concept Plan by more than 10%.

The open space approved as part of the MCP with Z-23-022 is proposed to be increased to reflect the additional commercial acreage.

iv. Does not decrease the amount of indigenous native vegetation preservation or open space areas below the amount required by the Code.

The indigenous preservation and restoration is not within the ES and commercial tract subject to this request. The provided indigenous preservation and restoration approved as part of the MCP with Z-23-022 is not proposed to be amended.

v. If changes to the buffer or landscape areas are proposed, equivalent of better (by comparison with the approved Master Concept Plan) landscaping or buffering is provided.

No changes to the approved buffers incorporated into the MCP approved with Z-23-022 are proposed.

vi. Does not adversely impact surrounding land uses.

The proposed changes to the MCP maintain the overall development footprint as approved by Z-23-022. The adjustment to the internal tract line reflects a request of the LAFD and does not negatively impact any adjacent or surrounding uses. Rather, providing the requested 2.4 acres to the LAFD will permit additional public safety services to be provided to the adjacent and surrounding area with improved response times.

vii. Is consistent with all applicable provisions of the Lee Plan and land development regulations in effect at the time of the amendment request.

The proposed development continues to be located within an Urban FLU and the Lehigh Acres Planning Community. The revised MCP continues to enhance the planned development and maintain the public health, safety and welfare. The approved commercial uses are consistent with

the future land use category and the vision for an increase in commercial – including a large retail anchor – within the Lehigh Acres community.