



Consolidated Review Comments

Record Number: [DCI2025-00019](#)

Click the record number to open it in the eConnect/ACA portal.

Department of Community Development
Zoning
P.O. Box 398
Fort Myers, FL 33902

Report Date: 10/28/2025

Record Type: Planned Development

Address: 19551 ARMEDA RD, ALVA, FL 33920

Project Name: Armeda Property

Record Description: Rezone 561.63±-acres from Agricultural (AG-2) to Residential Planned Development (RPD).

Staff has reviewed the above-referenced application in accordance with the applicable requirements of the Lee County Land Development Code (LDC). Please be advised that the application is insufficient at this time. A public hearing date will not be scheduled until a complete application is submitted.

Please respond to the enclosed sufficiency review comments within 30 days of the date of this letter. This application may be withdrawn if no response is received within this timeframe.

In order to facilitate an efficient review process, Staff is available to the Applicant and the Developer to schedule a meeting to discuss the remaining comments prior to resubmittal of the application. Contact PODZoning@leegov.com.

GENERAL COMMENTS:

The information below is an advisory summary of any significant issues identified for the project.

<u>Corrections</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
<u>Development Services Review</u>				
Yes	Development Services 1. Please provide more information regarding the access shown in the northwest corner of the development abutting the TerraWalk subdivision. Is this proposed as an emergency access? It does not appear to line up with the existing street network for TerraWalk. 2. The typical roadway section provided on Page 3 of the MCP depicts a 50-foot ROW, however, Page 1 depicts a 40-foot ROW. Please clarify. 3. INFORMATIONAL COMMENT: Development Order approval is required in addition to this zoning action. 4. LDC Section [34-1748(1) - (5)] Entrance Gates & Gatehouses. The provisions of LCLDC Section 34-1748 apply to entrance gates or gatehouses that control access to three or more dwelling units or recreational vehicles, or any commercial, industrial or recreational facility. NOTE: At time of development order the applicant must demonstrate compliance with this requirement. 5. LDC Section [10-256(b)(2)c.]. The developer must construct bicycle and/or	Allyson Hall	Open	16

<u>Corrections</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
	pedestrian ways, where applicable, in private subdivisions internal to the development as follows: 1.A pedestrian way is required along one side of all streets internal to a residential development and must extend from intersection to intersection; and 2.A pedestrian way is required along one side of all cul-de-sac streets that serve two dwelling units or more. The pedestrian way must extend from the intersection to the end of the cul-de-sac. Exceptions to this requirement are: i. Where the construction will encroach upon the required setback from a conservation or preservation area; or ii. Where the proposed street forms an exterior boundary to the subdivision. •NOTE: At time of development order the applicant must demonstrate compliance with this requirement. 6. [10-329(d)(1)a.3.] Excavation Setback from Other Property. Excavations must be set back fifty (50) feet from any property line under separate ownership. •NOTE: At time of development order the applicant must demonstrate compliance with this requirement. 7. [10-329(d)(1)a.1.] Excavation Setback from Local Street. Excavations must be set back twenty-five (25) feet from any existing or proposed local street right-of-way line or easement. •NOTE: At time of development order the applicant must demonstrate compliance with this requirement. 8. INFORMATIONAL COMMENT: For all lakes deeper than 12 feet, a Deep Lake Management Plan must be submitted and approved prior to development order issuance in accordance with LDC Sec. [10-329(d)(3)].			
<u>DOT Review</u>				
Yes	TIS Review Comments: 1. Part II - Existing Conditions, Paragraph 1: The description for the project location is incorrect, please update. (**Same as CPA TIS comment**) 2. Page 9: The project access description ("one access connection") disagrees with the MCP, which reflects two proposed access roads and a single existing access point to remain (Armeda Road). 3. Page 12, Paragraph 3: Intersection analysis commentary references two site access driveway intersections. While the statement is correct that no other (major) intersections exist within ¼ mile of the subject site, it may be necessary to include the Armeda Road access if the units served by this access point are not served by one of the proposed project accesses. 4. Regarding Table 5A: 4.1 The calculation for LOS adjustments has been incorrectly applied. The formula should account for maximum 5% increase for exclusive Left Turn Lanes, and maximum 5% increase for exclusive Right Turn Lanes; however the formula used has compounded the adjustments. Please revise to ensure that no greater than total 10% adjustment (of the base LOS) is applied. 4.1.1 Example: 4.1.1.1 SR 31 (north and south of N. River Road) reflect a LOS C capacity of 1,874, which is likely formulated as $((1,850 \times 1.05) \times 1.05) = 1,874$. This incorrectly compounds the base LOS C capacity of 1,850 for C3R for both exclusive Left Turn lanes and for exclusive Right Turns. This should instead be formulated as $(1,850 \times 1.05) + (1,850 \times 1.05) = 2,035$. Please make the same correction throughout the table. 4.1.1.2 SR 80 4LD LOS D Volume should be 1,810 for C3C, and apply the	John Podczerwinsky	Open	27

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	correct adjustments from there. 5. Regarding Table 6A: 5.1 Please show K Factor and D Factor used for North River Road 5.2 Some D Factors for State Road count stations are incorrectly stated. All instances showing 0.528 should be revised to 0.55 per the current FDOT count station data. 6. Depictions and analysis of intersection turning movements at project entrances are not present but are required for the sufficiency review. Include existing conditions for Serenoa Ct, a county-maintained local street. 7. Provide intersection LOS analysis for each intersection influenced by the project's area of significant impacts.			
Yes	DOT 1. Access: On the master concept plan, please depict and identify the existing and approved access points on both sides of North River Rd along the project frontage and to the nearest access point beyond the project frontage in each direction. The minimum standards of connection separation on N River Rd is 660 feet. The proposed and existing project entrances on North River Road are inconsistent with Lee County Access Management requirements (LDC 10-285), where Arterial access spacing for either "future suburban" or "future Non-urban" is 660'. The western-most access point may not meet this requirement depending on the disposition of existing Armeda Road driveway. 1.1 Armeda Road (existing access) is reflected on the MCP as "Existing Single Family Driveway to remain" and serves existing residential units, which are within the MCP boundary but are not depicted on the MCP. Please clarify: 1.1.1 Whether Armeda Road will be identified as a separate project access 1.1.2 If the residential units currently served by this access will be served by other access points to North River Road. 1.1.2.1 If Armeda Road access will remain unchanged, identify the final number of units within the MCP that it would provide access to. 3. Access spacing for the western-most project access to North River Road is depicted approximately 580' from existing Armeda Road, and may be deficient in meeting minimum 660' access spacing required by LDC 10-285. 3.1 If proposing less than the minimum required access spacing, a deviation from LDC 10-285 is required. 4. Note: Access spacing for the eastern-most project access is approximately 650' from existing Armeda Road. (No sufficiency response required unless spacing is reduced)	John Podczerwinsky	Open	28
<u>Environmental Review</u>				
Yes	Environmental Comments 1. Please provide an indigenous Restoration, Creation, and Preservation Management Plan to comply with Lee Plan Policy 123.2.17. 2. Provide exhibits with detailed restoration plans showing grading, vegetation in each grade level, soil amendments, planting and irrigation schedules, monitoring schedule, wildlife corridor connections, and human coexistence measures. This plan must be consistent with the hydrological restoration plans to ensure survivability of existing and proposed restoration plantings. 3. Include an exhibit in the Indigenous Restoration, Creation, and Preservation Management Plan showing methods for exotic vegetation removal (mechanical, chemical, and/or hand removal).	Paige Carroll	Open	20

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	4.The typical lot to preserve cross sections show the back slope of the berm planted with native herbaceous vegetation. Please clarify whether this area is intended to be classified as restoration and/or creation for the purpose of qualifying for the dwelling unit incentives. 5.Please provide a consistent Indigenous Restoration, Creation, and Preservation Management Plan that clearly distinguishes between the various habitat types (e.g., wetland creation, wetland restoration, wetland preservation, upland creation, rare and unique restoration, etc.). Use distinct hatching patterns for each habitat type and include a corresponding legend within the Master Concept Plan, Protected Species Management Plan, and Indigenous Restoration, Creation, and Preservation Management Plan. 6.A stated benefit in the narrative is the establishment of wildlife corridors connecting to preservation lands to the north, south, east, and west. Include specific details within the Indigenous Restoration, Creation, and Preservation Management Plans describing how these connections will be achieved. Provide an exhibit illustrating the connection points and demonstrating how the onsite habitat will complement the adjacent offsite habitats. 7.The narrative notes that compensating storage is proposed to offset impacts associated with access to Babcock Ranch. Provide additional information and supporting documentation detailing the volume, location, and potential effects of the compensating storage on the restoration, creation, and preservation of indigenous habitats. The current Master Concept Plan does not depict this compensating storage, it must be illustrated and clearly described within the plan.			
Yes	Environmental Comments 8.Provide a Protected Species Management Plan. The Protected Species Management Plan must demonstrate how the restoration plan will support protected species through creating habitat for foraging, nesting, and raising offspring. 9.The Master Concept plan shows wetlands potentially being impacted to create rare and unique uplands to increase the number of dwelling units. Please provide a state verified wetland delineation to show compliance with Goal 124 in the Lee Plan. 10.Demonstrate in the Indigenous Restoration, Creation, and Preservation Management Plan that restoration and creation areas will maintain surface water flow. The environmental consultant and hydrological engineer need to ensure positive flow will occur. May affect total dwelling units and overall density calculations per Lee Plan Policy 123.2.17. 11.The narrative identifies stormwater enhancements and green infrastructure as project benefits. Please provide detailed descriptions and cross-sections illustrating how these elements are being incorporated into the project design. The applicant is requesting a deviation from the standard lake bank slope requirement (from 6:1 to 4:1), demonstrate how this deviation supports and enhances the proposed stormwater management features and green infrastructure benefits described in the narrative. 12.The narrative identifies improvement of existing wetland hydroperiods within onsite preserves. The	Paige Carroll	Open	21

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	applicant indicates approximately 49 acres of wetlands are proposed for preservation. Provide details comparing the existing hydroperiods with post development conditions. Describe how the preserved areas are being created, restored, or enhanced to improve hydroperiods within habitats to support protected species. 13. Provide cross sections and more details showing how internal roads will cross preserves and FEMA floodways. Please indicate if indigenous areas cannot be restored due to roadway construction. May impact total dwelling units per Lee Plan Policy 123.2.17. 14. Revise the Master Concept Plan and restoration/creation exhibit to remove upland creation shown over driveways accessing the excluded parcels. 15. Please label white blocks on the Master Concept Plan. Are these areas part of the Restoration, Creation, and Preservation Management Plan?			
Yes	Open Space 16. Provide an open space exhibit showing restoration, preservation, and creation areas with distinct hatching for wetland and upland types. Include acreage for each area in the legend and on the plan. Provide a breakdown demonstrating that 50% of the required 60% open space is indigenous, per Lee Plan Policy 123.2.17. 17. Please depict where the 10 percent general open space will be provided within the open space exhibit. 18. Revise the open space calculations to meet LDC Section 10-415(d)(2)c, which allows existing or proposed water bodies, including the Trout Creek flow way within the 229-acre conservation easement to count for no more than 25% of required open space. 19. Please ensure the indigenous open space areas meet the minimum dimensions per LDC Section 10-415 (c)(3)(4)(5).	Paige Carroll	Open	22
Yes	Buffers 20. Demonstrate compliance with the required 25ft wide Type D buffer and plantings along North River Road. 21. Demonstrate compliance with the required Type F buffer around two parcels not included on the Master Concept Plan 22. Please revise Master Concept Plan to show the 20ft wide natural waterway maintenance easement on both sides of Trout Creek and any other tributaries from Trout Creek to comply with LDC Section 10-328. 23. A 50-foot-wide natural waterway buffer is required along all natural waterways per LDC Section 10-416(d)(9), including Trout Creek and its tributaries. Revise all relevant exhibits, including the Master Concept Plan, to clearly depict the required natural waterway buffer. Note the 20ft wide natural waterway maintenance easement and the 50ft waterway buffer can overlap. 24. Please revise Deviation 2, the conservation easement in replacement of the buffer along North River Road. Does the current vegetation meet the requirements per LDC Section 33-1673? The provided Species Assessment Map shows no vegetation along the frontage of Parcel B and the depicts improved pasture on Parcel A along North River Road. Please revise request.	Paige Carroll	Open	23
<u>LeeTran Review</u>				

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Yes	LeeTran has reviewed the proposed development and determined that it is over a quarter-mile from the nearest bus stop or fix-route corridor; as per Transit LDC section 10-441, no developer improvements are required.	Jose Perez	Open	1
<u>Legal Review</u>				
Yes	- The property description included in the document submitted for LDC §34-202(a)(7)(b)(iv) is inconsistent with the legal descriptions included in documents addressing LDC §34-202(a)(5) and LDC §34-202(a)(6). - The document addressing LDC §34-202(a)(7)(b)(iv) does not include the south half of the northeast quarter of the southeast quarter of section 8.	Larissa Narkiewicz	Open	15
<u>Natural Resources Review</u>				
Yes	Please provide an analysis of Lee Plan policies 60.4.2, 61.3.3, 123.2.10, 124.1.2, 126.1.1, 126.1.4, 125.1.8.	Nicholas DeFilippo	Open	2
Yes	Please identify what the unlabeled white polygons represent on the MCP?	Nicholas DeFilippo	Open	3
Yes	Please provide a map depicting existing and historic flow-ways per LDC 34-373(a)(4)(b)(v).	Nicholas DeFilippo	Open	4
Yes	There are two historic flowways through the property. Please provide analysis of Lee Plan policy 60.4.3 expanding on how the proposed project will preserve/restoring these flowways. Babcock Ranch received a Development Order (DOS2023-00031) to restore a historic flowway that the Armeda Project appears to accommodate through the project. Will the project be designed to accept these offsite flows? Please detail what CFS the design will be able to accommodate?	Nicholas DeFilippo	Open	5
Yes	Please provide additional information detailing how the proposed design will maintain or improve offsite flow capacity in accordance with Lee Plan policy 126.1.4. What size culverts are necessary at the Trout Creek crossing? What size culverts are necessary to convey offsite flows under the internal roadways crossing the preserved flowway which originates in Babcock Ranch?	Nicholas DeFilippo	Open	6
Yes	Please identify the anticipated irrigation source in accordance with Lee Plan policy 61.1.6. What is the anticipated irrigation demand?	Nicholas DeFilippo	Open	7
Yes	Please provide groundwater drawdown contours based on anticipated irrigation demand and source(s). How will the proposed development impact the surrounding single-family homes that utilize the Sandstone aquifer as a domestic water source?	Nicholas DeFilippo	Open	8
Yes	Please provide a map depicting the proposed development footprint and Wellfield Protection Zones. It is not clear what development is proposed within Protection Zones.	Nicholas DeFilippo	Open	9
Yes	Please provide a surface water and groundwater monitoring plan per Lee Plan policy 125.1.4. The application indicates monitoring will occur.	Nicholas DeFilippo	Open	10
Yes	Are there any flowing wells located on the property? What impact will these wells have on proposed Wellfield? If flowing wells are proposed to be closed and abandoned, it must be completed prior to commencement of construction.	Nicholas DeFilippo	Open	11
Yes	Please demonstrate compliance with 10-328(a) on the MCP. Please depict drainage and access easement(s) that comply with 10-328(a) on the MCP. Please provide a cross section on MCP.	Nicholas DeFilippo	Open	12
Yes	The project depicts impacts and placement of impediments, including creation of Rare and Unique Habitat, within the FEMA Floodway. Please note that a No-Rise certification will be required prior to issuance of Development Order proposing impacts in Floodway. Created Rare & Unique within existing farm fields will need to be modeled at that time.	Nicholas DeFilippo	Open	13
<u>Planning Review</u>				
Yes	The Armeda RPD must stay consistent with the proposed CPA, as changes to the CPA may necessitate changes to the rezone. Planning may add additional comments to the RPD as the CPA progresses.	Katherine Burgess	Open	24

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Yes	Planning will not find the proposed RPD sufficient until the CPA has been found sufficient.	Katherine Burgess	Open	25
<u>Zoning Review</u>				
Yes	Revise the application to include a density calculation document to be consistent with the environmental restoration, preservation, and creation to demonstrate how the applicant is obtaining 737 dwelling units. Please explain if the 54.06 acres of wetlands have been verified by the State of Florida. If the acreage of State wetlands changes, the change whether larger or smaller will affect the density calculations which would include all environmental supporting documents for the incentives pursued in Lee Plan Policy 123.2.17. Please advise. Please revise the application to include a phasing plan for how the site will be developed to achieve the density incentives through the environmental preservation, creation, and restoration. Please note that the phasing plan will coincide with the Agricultural exemption extinguishment through revised agricultural affidavits submitted at prior to development order approval and recorded conservation easements. Provide the public information meeting advertisement, minutes of the meeting, and supporting information for Northeast Lee County Community Plan Area with a total of two meetings with one in Alva and one in North Olga Community Plan Areas per Lee Plan Policy 27.1.8. Provide Letters of Availability for all public services to include potable water, sanitary sewer, EMS, Fire, Lee County Sheriff, Lee County Public Schools, and interlocal agreements with Charlotte County/Babcock Schools. The Letter of Availability included in the application did not provide consistent density. Provide these supporting documents to demonstrate compliance with Lee Plan Policy 2.2.1 and Lee Plan Standards 4.1.1, 4.1.2, and 4.1.4. The Master Concept Plan depicts a future interconnection between the subject property and Babcock Ranch MPD along the northwest property line. Please provide written correspondence between the applicant and Babcock Ranch MPD that would allow the interconnection. Staff have concerns as the connection to Babcock connects to a gated residential community within Babcock Ranch. Please advise.	Elizabeth Workman	Open	17
Yes	Please explain how the preserve area and Type-F buffer around offsite AG-2 property and ingress/egress easement interfaces with the development. The MCP and all environmental documents consider the ingress/egress easements as preservation area, but the easement serves as a drive to the offsite properties. Depict where the Type-F buffers are being proposed (around parcel and ingress/egress) and how the ingress/egress will serve as the preserve. Revise the MCP to provide a label on three areas which resemble lakes that are located north of the Amenity in Parcel A. Provide a letter from the fire marshal to support Deviation #1. The applicant is stating that LDC Section 33-1673 cannot be met because there are existing trees abutting North River Road creating a hardship. The FLUCCS map provided by the applicant's environmental consultant depicts	Elizabeth Workman	Open	18

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	no existing vegetation along the southeast property line abutting North River Road. Revise the deviation request to clearly state where the deviation is to be applied, the type of vegetation species that will be utilized to meet the buffer requirements, and where the buffer will be met due to no vegetation. The applicant is proposing Deviation #3 from 6:1 lake bank slope to design the lake at 4:1 to save indigenous areas. Label on the MCP where this deviation will be applied. Most of the lakes are surrounded by residential lots. Expand Deviation #3 justification to provide a cross section showing the 4:1 lake bank slope, alternative stabilization using sound engineering, and compensatory littorals if hardening is proposed. LDC Section 10-329(d)(4) was changed to 6:1 because of slope compromising and loss or damaged structures. Explain how this design with 4:1 lake bank slopes is better.			
Yes	Explain if planted littoral shelves will meet the slope requirements per LDC Section 10-418. Explain how the internal roads are being designed to not impact the preserve restoration, creation or preservation and how the wetlands will be connected to improve the flow of water. The MCP includes typical cross sections of the single-family lots abutting the preserve. The cross sections depict native herbaceous grasses in addition to the structural buffer. Please explain if these features are included in the preserve restoration incentive. Revise the Schedule of Uses to be consistent with LDC Section 34-934. The Applicant's Narrative lists 22 benefits that the proposed development will provide but does not include supporting documents to demonstrate how the benefits will be provided or designed. The review team is missing pertinent documents to support the density incentive and additional comments may be required once staff has received a complete submittal. Please note that staff cannot schedule a hearing date once the zoning case has been found sufficient until the CPA has been transmitted to the State of Florida Department of Economic Opportunity (DEO) by the Board of County Commissioners.	Elizabeth Workman	Open	19

CORRECTIONS NEEDED:

Items marked Yes must be resolved before the plan review can be approved. Items marks "No" may be deferred to subsequent submittals and are not required to be addressed prior to approval of plans and documents.

REVIEWER CONTACT INFORMATION:

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