



## Consolidated Review Comments

Record Number: [CPA2025-00008](#)

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

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

**Report Date:** 11/04/2025

**Record Type:** Comprehensive Plan Amendment

**Address:** 19551 ARMEDA RD, ALVA, FL 33920

**Project Name:** Armeda Property

**Record Description:** Request to amend the Future Land Use Map (Map 1-A) to change the FLU category on 561.63± acres from DR/GR to Rural and Wetlands, amend Lee County Future Water Service Areas (Map 4-A) and Lee County Future Sewer Service Areas (Map 4-B) to add the subject property.

Staff has reviewed the application submittal for the Lee Plan Amendment, CPA2025-00008, originally received 2025-09-12 00:00:00. Planning Staff finds that the application materials are insufficient and further information is needed. A public hearing date will not be scheduled until a complete application is submitted. If you do not provide the requested supplements of corrections within 90 days of this letter, this application will be considered withdrawn. Please feel free to contact Planning at (239) 533-8585 if you have any questions.

**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>DOT Review</u>				
Yes	DOT Comment 1: Part II - Existing Conditions, Paragraph 1: The description for the project location is incorrect; please update.	Katherine Burgess	Open	35
Yes	DOT Comment 2: Table 1 (page 4); Table 2, Table 4 (page 5): The “existing” uses detailed in the comp plan portion of the TIS (52 DU’s) mismatch the CPA application (53 DU’s). It is not necessary to reflect the trip generation for these units, as they may not be credited as “existing” trip generation accredited to the CPA. These trips cannot be credited against/discounted from the total trip generation for the proposed 737 units. Please remove the discounted trips from Table 4 and adjust the following tables/statements throughout the TIS to correctly reflect only the trips that would be generated by the proposed land use.	Katherine Burgess	Open	36
Yes	DOT Comment 3: Page 6 - Long Range Impacts - Please correct the statement “there were no roadway improvements within a 3-mile radius of the site shown on the 2045 Cost Feasible Plan.” (Note: The preparer has correctly reflected the planned improvement in subsequent tables and appendices). Examples: - SR 31 will be widened first to 4LD (5 year), then 6LD (2045) - SR 78 will be widened to 4LD (5 year + 2045)	Katherine Burgess	Open	37
Yes	DOT Comment 4: Page 7 - Short Range Impacts: The preparer may now include SR 31 widening to 4LD between SR 78 to Cook Brown Rd. Funding is reflected in Lee MPO’s 2026-2030 TIP for this road segment.	Katherine Burgess	Open	38

<u>Corrections</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
Yes	DOT Comment 5: Page 8 - Please revise paragraph one of the Short Range Impact summary to reflect total trips for the 737 dwelling units, rather than only the increase in trips.	Katherine Burgess	Open	39
Yes	DOT Comment 6: Table 1A - - 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. - Example: - SR 31 (north and south of N. River Road) reflect a LOS C capacity of 2,888, which is likely formulated as $((2,620*1.05)*1.05) = 2.888$ . This incorrectly compounds the base LOS C capacity of 2,620 for C3R for both exclusive Left Turn lanes and for exclusive Right Turns. This should instead be formulated as $(2,620*1.05)+(2,620*1.05) = 2,882$ . Please make the same correction throughout the table. - It is unclear where the LOS D Volume for SR 78 was found; the reviewer cannot reproduce this even using the adjustment factors. Please double check and advise which FDOT MMLoS table this was found in, or correct to the current reference for C3R context class, LOS D. (Note: The LOS D base volume should be 1,850 and apply the correct adjustments from there). - SR 80 4LD LOS D Volume should be 1,810 for C3C, and apply the correct adjustments from there	Katherine Burgess	Open	40
Yes	DOT Comment 7: Table 2A - - Reflect the correct total PM Peak Hour Project Traffic (604 trips). - K Factor and D Factor for North River Road should be 0.089 and 0.60, respectively. - D Factors for most State Road Segments are incorrectly stated. All instances showing 0.528 should be revised to 0.55 per the FDOT count station data. - When Trip Generation, KFAC, and DFAC revisions are implemented, please update Project Traffic Distribution, PM Peak Hour Project Traffic, and Traffic Volumes accordingly.	Katherine Burgess	Open	41
Yes	DOT Comment 8: Table 3A - - Please double-check the calculated LOS Volumes consistent with the comments on Table 1A.	Katherine Burgess	Open	42
Yes	DOT Comment 9: Table 4A - - Please revise Project Traffic consistent with comments on Table 2A. (Note: Table 3A correctly reflects FDOT DFAC for the stations listed). - Please update AM and PM Project traffic in accordance with the trip generation revision.	Katherine Burgess	Open	43
<u>Environmental Review</u>				
Yes	Zoning Sufficiency  CPA2025-00008 documents must be consistent with the zoning case DCI2025-00019.	Elizabeth Workman	Open	2
Yes	Provide a map and description of the soils found on the property	William Lange	Open	3
Yes	Provide a topographic map depicting the property boundaries and any 100-year flood prone areas as identified by FEMA.	William Lange	Open	4
Yes	Provide a map delineating property boundaries on the most recent FLOOD Insurance Rate Map.	William Lange	Open	5
Yes	Provide an analysis of Lee Plan policies 60.1.2, 60.4.3, 61.1.6, 123.2.10, 123.2.15, 123.3.2, and 123.4.1.	William Lange	Open	6

<u>Corrections</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
Yes	Pursuant to Lee Plan Policy 2.3.1 and 61.1.6, provide an integrated surface and ground water model that utilizes site-specific data to assess the potential adverse impacts on water resources and natural systems.	William Lange	Open	7
Yes	The application indicates that the subject property is utilized by endangered and threatened species. Please provide an analysis of Objectives 123.3 and 123.4 discussing how the requested Map amendments are consistent with these objectives as it relates to endangered and threatened species.	William Lange	Open	8
Yes	The well field protection zone map indicates future well fields in this location, provide an analysis of goal 63, discussing how the proposed map amendment will continue to protect the counties groundwater supplies.	William Lange	Open	9
<u>Legal Review</u>				
Yes	If the subject property contains wetlands or the proposed amendment includes more than one land use category a metes and bounds legal description must be submitted in addition to the perimeter boundary of the property for each wetland or future land use category.  The application states the request is to Rural and Wetlands. A metes and bounds legal description is required for the Wetlands land use category. Wetlands future land use boundaries will be determined by using the methodology in Fla. Admin. Code R. 17-340 as ratified and amended in § 373.4211, Fla. Stat. A Jurisdictional Determination approved by SFWMD or Florida DEP must be submitted prior to the issuance of such an interpretation.	Richard Burris	Open	11
<u>Planning Review</u>				
Yes	The justification provided in Exhibit M20 does not sufficiently address the proposed Future Land Use Map Amendment. Revise the justification to address why it is in the County's best interest to redesignate the subject property as Rural instead of DR/GR. The response should provide data and analysis that verifies the DR/GR designation is not appropriate on the subject property and/or that the rural designation is more suitable. The response should not address the potential benefits of the proposed companion rezone.	Katherine Burgess	Open	14
Yes	The surrounding properties map and list of property surrounding property owners appear to be correct. Physical mailing labels of the list included in Exhibit M3 will need to be provided with a later submittal.	Katherine Burgess	Open	23
Yes	Provide a list of all the consultants working on this application.	Katherine Burgess	Open	24
Yes	Add an exhibit that describes the application request(s).	Katherine Burgess	Open	25
Yes	Under Objective 4.1, properties that are within the Lee County Water and Sewer Service Area maps cannot receive water or sewer service from an entity other than Lee County Utilities unless LCU agrees. Confirm that LCU is the service provider this development will be using for these services, or update the request accordingly.	Katherine Burgess	Open	26
Yes	Many of the analyses in the Lee Plan Analysis focus on the rezone's consistency with the Lee Plan, not on the proposed CPA's consistency with it. The Goal, Objective, Standard, and Policy analysis in the Lee Plan Analysis needs to address how the proposed comprehensive plan amendment is consistent with the Lee Plan, particularly with respect to use, density, and intensity, given what is possible in the Rural FLU versus the DR/GR. Revise as necessary.	Katherine Burgess	Open	33
Yes	Some comments and edits only appear in DigEPlan. Verify that all comments, highlights, or other markups are addressed in the resubmittal, as each will be reviewed until the status for the comment is updated to "closed".	Katherine Burgess	Open	44
Yes	The resubmittal in response to comments must be submitted as one submittal package. Staff cannot add files or responses ad hoc to the application materials.	Katherine Burgess	Open	45

<u>Corrections</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
<u>Zoning Review</u>				
Yes	HISTORIC: applicant has not provided a map of the subject property showing the archaeological Sensitivity Zones.  The applicant has not provided a map of any historic districts and/or sites listed on the Florida Master Site File which are located on the subject property or adjacent properties.	Peter Blackwell	Open	1

**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.*

Document: Submittal 1 - Exhibit - M12 & M19 - Lee Plan Analysis + State Policy and Regional Policy Plan.pdf

<u>Corrections</u>	<u>Page Ref</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
<u>Planning Review</u>					
Yes	4	Provide the analysis of the environmental report as it applies to this policy in this section.	Katherine Burgess	Open	46
Yes	6	Under Lee Plan Objective 1.5, all areas designated as Wetlands by the state are considered part of the Wetlands FLUC. Revise this response as necessary.	Katherine Burgess	Open	22
Yes	6	Provide an analysis on how the property is consistent with the proposed Rural FLUC and the potential differences in allowed uses between Rural FLUC and DR/GR FLUC.	Katherine Burgess	Open	27
Yes	8	Updates to Table 1(b) require a comprehensive plan amendment. Contact Rick Burris at RBurris@leegov.com to determine if Table 1(b) amendments are necessary and add the Table 1(b) amendment to this application request.	Katherine Burgess	Open	28
Yes	8	Provide a map of these areas to verify that each area is only being used for one incentive.	Katherine Burgess	Open	29
Yes	9	Objective 2.2 states that growth should be directed to future urban areas. Future urban area is a defined term in the Lee Plan. DR/GR, Wetlands, and Rural FLUC are defined as Future Non-Urban Areas. Revise the response to consider the request from this perspective.	Katherine Burgess	Open	30
Yes	9	The application materials did not include a Letter of Availability from LCU. There is reference to this letter coming under separate cover. LCU's availability letter should be included in the resubmittal and may require changes to the analyses of the sections that reference the information coming under separate cover. Additionally, if LCU is not able to provide water or sewer service, these responses will need to be changed. Revise accordingly.	Katherine Burgess	Open	31
Yes	10	Provide an analysis of how the map amendment from DR/GR (Density Reduction/Groundwater Resource) to Rural supports the water quality in this area, particularly with the change in potential uses and density.	Katherine Burgess	Open	32
Yes	10	The phrase, "The requested future land use map amendment will facilitate the concurrent residential planned development" appears to be used as justification for the proposed map amendment throughout the application. A pending zoning action is not justification for a Future Land Use Map amendment. Consider rewording these to better support the CPA request.	Katherine Burgess	Open	34

Document: Submittal 1 - Exhibit - M21 Planning Community Requirements.pdf

<u>Corrections</u>	<u>Page Ref</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
<u>Planning Review</u>					

<u>Corrections</u>	<u>Page Ref</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
Yes	1	The community meetings must be completed and all of the information included in Policy 17.3.4 is provided to staff for review before the application is found sufficient.	Katherine Burgess	Open	12

Document: Submittal 1- Letters of Availability.pdf

<u>Corrections</u>	<u>Page Ref</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
<u>Planning Review</u>					
Yes	2	The application materials correctly include the utilities request letter to LCU; however, the letter of availability from LCU is missing. Provide the Letter of Availability for water and sewer services from LCU.	Katherine Burgess	Open	15
Yes	3	The application materials correctly include the Fire request letter to Bayshore Fire District; however, the letter of availability from is missing. Provide the Letter of Availability from the Bayshore Fire District.	Katherine Burgess	Open	16
Yes	4	The application materials correctly include the law enforcement request letter to LCSO; however, the letter of availability from LCSO is missing. Provide the Letter of Availability from LCSO.	Katherine Burgess	Open	17
Yes	5	The application materials correctly include the LeeTran request letter; however, the letter of availability from LeeTran is missing. Provide the Letter of Availability for LeeTran.	Katherine Burgess	Open	18
Yes	6	The application materials correctly include the Lee County Schools request letter; however, the capacity letter from LCS is missing. Provide the capacity letter from LCS.	Katherine Burgess	Open	19
Yes	7	The application materials correctly include the EMS request letter to Public Safety; however, the letter of availability is missing. Provide the Letter of Availability for EMS.	Katherine Burgess	Open	20

**REVIEWER CONTACT INFORMATION:**

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