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COMMUNITY DEVELOPMENT

February 2, 2026

Ms. Kate Burgess, AICP, Principal Planner
Lee County Department of Community Development
1500 Monroe Street, 2nd Floor
Fort Myers, FL 33901

**RE: Caloosa 80 (CPA2024-00016)
Sufficiency Response**

Dear Ms. Burgess,

Please find following responses to your comments received on November 12, 2025. The following documents have been provided to assist in your review of the petition:

1. Community Meeting Table
2. Revised Application Form
3. Revised TIS Table 4A

The following is a list of Staff's comments with the Applicant's responses in **bold**.

1. Provide a table with the meeting dates and locations.

RESPONSE: Please see attached Community Meeting Table.

2. Update the application with the new project manager and provide a list of the consultants working on this project.

RESPONSE: Please see revised application form with the new project manager listed.

3. Since there is a companion MPD rezone with this application for 690 DU's and 50,000 sf of commercial uses, the uses for trip generation shall be consistent with the uses of the MPD rezone application.

RESPONSE: As discussed with Staff, the TIS analyzes the CPA impacts based on the request to amend the future land use for 92 acres from Rural to Sub-Outlying Suburban (see pages 3 and 5 of the October 14, 2025 TIS). The zoning section of the TIS analyzes the overall project impact of the 690 dwelling units and 50,000 SF commercial uses.

Transportation Planning Staff noted concern the CPA portion of the TIS does not fully analyze the maximum impacts of the 92-acre conversion to Sub-Outlying Suburban due to the allowable commercial uses under this category. I.e. the impact of 92 acres of commercial retail uses on the surrounding roadway network. The Applicant has considered this request in the context of the Florida Statutes and the Lee Plan as a whole and offers the following justifications for the TIS provided:

- Lee County has historically exercised discretion when reviewing companion CPA and PD rezonings and have allowed these applications to be reviewed based upon the same

data and analysis, when submitted concurrently. The Applicant respectfully requests this discretion be exercised on this application due to the extensive review to date. It is understood this may require concurrent adoption hearings for both the CPA and PD.

- Also, in the context of the Alva Community Plan Goals, Objectives and Policies, the Applicant respectfully submits the TIS evaluating 690 dwellings and 50,000 SF of commercial is in fact the “worst case scenario” or most intensive development attainable on the site per the Lee Plan and Goal 28. The Alva Community Plan policies require development that is compatible with the rural context of Northeast Lee County. Thus, these policies demonstrate that 92 acres of commercial uses on this site is unachievable and inconsistent with the Lee Plan and Alva Community Plan. This is evidenced through Planning Staff’s previous comments on concern relating to rural character compatibility and intensity.
- Additionally, 163.3184, Florida Statutes provides guidance for concurrent CPA and PD rezones as follows: *“CONCURRENT ZONING. — At the request of an applicant, a local government shall consider an application for zoning changes that would be required to properly enact any proposed plan amendment transmitted pursuant to this section. Zoning changes approved by the local government are contingent upon the comprehensive plan or plan amendment transmitted becoming effective.”*

We appreciate Staff’s consideration of this additional information relating to the context of the property and the Northeast Lee County and Alva portions of the Lee Plan.

4. The build-out year (2029) background traffic volumes in Table 4A are not correct and revision is required.

RESPONSE: Please see revised Table 4A. Table 4A had an error in the equation that computed the projected 2029 Background traffic volume. The growth computation went from the year 2015 to the year 2029 instead of from the 2023 existing volume year to the year 2029. That error has been corrected and Table 4A was revised and is attached. The results actually decreased the projected 2029 volumes on all the links and did not impact any Level of Service on any links in the Study Area. All roadways are still shown to operate at LOS “D” or better in 2029.

We appreciate staff’s time and consideration of the above information and respectfully request the Local Planning Agency be scheduled. Please contact me with any questions or concerns at 239.850.8525 or acrespo@rviplanning.com.

Sincerely,

RVi Planning + Landscape Architecture



Alexis Crespo, AICP

Vice President of Planning

Public Facilities Impacts

NOTE: The applicant must calculate public facilities impacts based on the maximum development.

1. Traffic Circulation Analysis: The analysis is intended to determine the effect of the land use change on the Financially Feasible Highway Plan Map 3A (20-year plus horizon) and on the Capital Improvements Element (5-year horizon). Toward that end, an applicant must submit a Traffic Impact Statement (TIS) consistent with Lee County Administrative Code (AC)13-17.

- a. Proposals affecting less than 10 acres, where development parameters are contained within the Traffic Analysis Zone (TAZ) or zones planned population and employment, or where there is no change in allowable density/intensity, may be eligible for a TIS requirement waiver as outlined in the Lee County TIS Guidelines and AC-13-17. Identification of allowable density/intensity in order to determine socio-economic data for affected TAZ(s) must be coordinated with Lee County Planning staff. Otherwise a calculation of trip generation is required consistent with AC-13-17 and the Lee County TIS Guidelines to determine required components of analysis for:
 - i. Total peak hour trip generation less than 50 total trip ends – trip generation.
 - ii. Total peak hour trip generation from 50 to 300 total trip ends – trip generation, trip distribution and trip assignment (manual or Florida Standard Urban Transportation Modeling Structure (FSUTMS) analysis consistent with AC-13-17 and TIS Guidelines), short-term (5 year) and long-range (to current Lee Plan horizon year) segment LOS analysis of the nearest or abutting arterial and major collector segment(s) identified in the Transportation Inventory based on the trip generation and roadway segment LOS analysis criteria in AC-13-17. A methodology meeting is recommended prior to submittal of the application to discuss use of FSUTMS, any changes to analysis requirements, or a combined CPA and Zoning TIS short term analysis.
 - iii. Total peak hour trip generation is over 300 total trip ends - trip generation, mode split, trip distribution and trip assignment (manual or FSUTMS analysis consistent with AC-13-17 and TIS Guidelines), short-term (five-year) and long-range (to current Lee Plan horizon year) segment LOS analysis of arterial and collector segments listed in the Transportation Inventory. LOS analysis will include any portion of roadway segments within an area three miles offset from the boundary of the application legal description metes and bounds survey. LOS analysis will also include any additional segments in the study area based on the roadway segment LOS analysis criteria in AC-13-17. A methodology meeting is required prior to submittal of the application.
- b. Map amendment - greater than 10 acres -Allowable density/intensity will be determined by Lee County Planning staff.

2. Provide an existing and future conditions analysis for the following (see Policy 95.1.3):

- a. Sanitary Sewer
- b. Potable Water
- c. Surface Water/Drainage Basins
- d. Parks, Recreation, and Open Space
- e. Public Schools

Analysis for each of the above should include (but is not limited to) the following (see the Lee County Concurrency Management Report):

- a. Franchise Area, Basin, or District in which the property is located
- b. Current LOS, and LOS standard of facilities serving the site
- c. Projected 2030 LOS under existing designation
- d. Projected 2030 LOS under proposed designation
- e. Existing infrastructure, if any, in the immediate area with the potential to serve the subject property
- f. Improvements/expansions currently programmed in 5 year CIP, 6-10 year CIP, and long range improvements
- g. Provide a letter of service availability from the appropriate utility for sanitary sewer and potable water

In addition to the above analysis, provide the following for potable water:

- a. Determine the availability of water supply within the franchise area using the current water use allocation (Consumptive Use Permit) based on the annual average daily withdrawal rate.
- b. Include the current demand and the projected demand under the existing designation, and the projected demand under the proposed designation.
- c. Include the availability of treatment facilities and transmission lines for reclaimed water for irrigation.
- d. Include any other water conservation measures that will be applied to the site (see Goal 54).

3. Provide a letter from the appropriate agency determining the adequacy/provision of existing/proposed support facilities, including:

- a. Fire protection with adequate response times
- b. Emergency medical service (EMS) provisions
- c. Law enforcement
- d. Solid Waste
- e. Mass Transit
- f. Schools

In reference to above, the applicant must supply the responding agency with the information from application items 5, 6, and 7 for their evaluation. This application must include the applicant's correspondence/request to the responding agency.

Environmental Impacts

Provide an overall analysis of the character of the subject property and surrounding properties, and assess the site's suitability for the proposed change based upon the following:

1. A map of the Plant Communities as defined by the Florida Land Use Cover and Classification system (FLUCCS).
2. A map and description of the soils found on the property (identify the source of the information).
3. A topographic map depicting the property boundaries and 100-year flood prone areas indicated (as identified by FEMA).
4. A map delineating the property boundaries on the most recent Flood Insurance Rate Map.
5. A map delineating wetlands, aquifer recharge areas, and rare & unique uplands.
6. A table of plant communities by FLUCCS with the potential to contain species (plant and animal) listed by federal, state or local agencies as endangered, threatened or species of special concern. The table must include the listed species by FLUCCS and the species status (same as FLUCCS map).

Impacts on Historic Resources

List all historic resources (including structure, districts, and/or archaeologically sensitive areas) and provide an analysis of the proposed change's impact on these resources. The following should be included with the analysis:

1. 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.
2. A map showing the subject property location on the archaeological sensitivity map for Lee County.

Internal Consistency with the Lee Plan

1. Discuss how the proposal affects established Lee County population projections, Lee Plan Table 1(b) and the total population capacity of the Lee Plan Future Land Use Map.
2. List all goals and objectives of the Lee Plan that are affected by the proposed amendment or that affect the subject property. This analysis should include an evaluation of all relevant policies under each goal and objective.
3. Describe how the proposal affects adjacent local governments and their comprehensive plans.

State Policy Plan and Regional Policy Plan

List State Policy Plan and Regional Policy Plan goals, strategies and actions, and policies which are relevant to this plan amendment.

Justify the proposed amendment based upon sound planning principles

Support all conclusions made in this justification with adequate data and analysis.

Planning Communities/Community Plan Area Requirements

If located within a planning community/community plan area, provide a meeting summary document of the required public informational session [Lee Plan Goal 17].

Sketch and Legal Description

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. If the subject property contains wetlands or the proposed amendment includes more than one land use category a metes and bounds legal description, as described above, must be submitted in addition to the perimeter boundary of the property for each wetland or future land use category.

SUBMITTAL REQUIREMENTS

Clearly label all submittal documents with the exhibit name indicated below.

For each map submitted, the applicant will be required to submit a 24"x36" version and 8.5"x11" reduced map for inclusion in public hearing packets.

MINIMUM SUBMITTAL ITEMS (3 Copies)

<input checked="" type="checkbox"/>	Completed Application (Exhibit – M1)
<input checked="" type="checkbox"/>	Disclosure of Interest (Exhibit – M2)
<input checked="" type="checkbox"/>	Surrounding Property Owners List, Mailing Labels, and Map For All Parcels Within 500 Feet of the Subject Property (Exhibit – M3)
<input checked="" type="checkbox"/>	Existing Future Land Use Map (Exhibit – M4)
<input checked="" type="checkbox"/>	Map and Description of Existing Land Uses (Not Designations) of the Subject Property and Surrounding Properties (Exhibit – M5)
<input checked="" type="checkbox"/>	Map and Description of Existing Zoning of the Subject Property and Surrounding Properties (Exhibit – M6)
<input checked="" type="checkbox"/>	Signed/Sealed Legal Description and Sketch of the Description for Each FLUC Proposed (Exhibit – M7)
<input checked="" type="checkbox"/>	Copy of the Deed(s) of the Subject Property (Exhibit – M8)
<input checked="" type="checkbox"/>	Aerial Map Showing the Subject Property and Surrounding Properties (Exhibit – M9)
<input checked="" type="checkbox"/>	Authorization Letter From the Property Owner(s) Authorizing the Applicant to Represent the Owner (Exhibit – M10)
<input checked="" type="checkbox"/>	Proposed Amendments (Exhibit – M11)
<input type="checkbox"/>	Lee Plan Analysis (Exhibit – M12)
<input checked="" type="checkbox"/>	Environmental Impacts Analysis (Exhibit – M13)
<input checked="" type="checkbox"/>	Historic Resources Impact Analysis (Exhibit – M14)
<input checked="" type="checkbox"/>	Public Facilities Impacts Analysis (Exhibit – M15)
<input checked="" type="checkbox"/>	Traffic Circulation Analysis (Exhibit – M16)
<input checked="" type="checkbox"/>	Existing and Future Conditions Analysis - Sanitary Sewer, Potable Water, Surface Water/Drainage Basins, Parks and Rec, Open Space, Public Schools (Exhibit – M17)
<input checked="" type="checkbox"/>	Letter of Determination For the Adequacy/Provision of Existing/Proposed Support Facilities - Fire Protection, Emergency Medical Service, Law Enforcement, Solid Waste, Mass Transit, Schools (Exhibit – M18)
<input checked="" type="checkbox"/>	State Policy Plan and Regional Policy Plan (Exhibit – M19)
<input checked="" type="checkbox"/>	Justification of Proposed Amendment (Exhibit – M20)
<input checked="" type="checkbox"/>	Planning Communities/Community Plan Area Requirements (Exhibit – M21)

APPLICANT – PLEASE NOTE:

Changes to Table 1(b) that relate directly to and are adopted simultaneously with a future land use map amendment may be considered as part of this application for a map amendment.

Once staff has determined the application is sufficient for review, 15 complete copies will be required to be submitted to staff. These copies will be used for Local Planning Agency hearings, Board of County Commissioners hearings, and State Reviewing Agencies. Staff will notify the applicant prior to each hearing or mail out to obtain the required copies.

If you have any questions regarding this application, please contact the Planning Section at (239) 533-8585.



**Caloosa 80
Community Meeting Table**

CPA2024-00016 - DCI2024-00045	
10/16/2024	Bayshore Fire Station
1/14/2025	Alva Community Center
2/11/2025	Alva Community Center
2/19/2025	Owl Creek Drive/North River Road ROW
4/16/2025	Bayshore Fire Station

**TABLE 4A
LEE COUNTY TRAFFIC COUNTS AND CALCULATIONS
CALOOSA 80 CPA**

TOTAL PROJECT TRAFFIC AM =	61	VPH	IN =	16	OUT =	45	<u>FDOT Sta.#</u>	<u>K</u>	<u>D</u>
TOTAL PROJECT TRAFFIC PM =	85	VPH	IN=	54	OUT=	31	120006	0.095	0.528
							120086	0.095	0.528
							124654	0.095	0.535
							124650	0.095	0.535
							305	0.095	0.540
							231	0.095	0.540

Revised 10-14-2025

<u>ROADWAY</u>	<u>ROADWAY SEGMENT</u>	<u>LC DOT PCS OR</u>	<u>BASE YR</u>	<u>FUTURE</u>	<u>YRS OF</u>	<u>ANNUAL</u>	<u>PK HR</u>	<u>PK SEASON</u>	<u>PEAK DIR.</u>	<u>VOLUME</u>	<u>LOS</u>	<u>PERCENT</u>	<u>V/C</u>	<u>PROJECT</u>	<u>AM PROJ</u>	<u>PM PROJ</u>	<u>2029</u>			<u>2029</u>		
																	<u>ADT</u>	<u>ADT</u>	<u>GROWTH.</u>	<u>RATE</u>	<u>PK HR</u>	<u>PK SEASON</u>
N. River Rd	E. of Broadway	124654	2,500	4,000	7	6.94%	100	150	C	0.21	2%	1	1	151	C	0.21	151	C	0.21			
	E. of Cemetery Rd.	124650	2,800	4,700	7	7.68%	224	349	B	0.29	3%	1	2	351	B	0.29	351	B	0.29			
Joel Blvd.	S. of SR 80	305	8,800	13,400	7	6.19%	547	784	C	0.48	5%	2	3	787	C	0.48	787	C	0.48			
SR 80 (Palm Beach Blvd)	E. of Hickey Creek Rd.	120006	17,700	27,000	7	6.22%	1,457	2,092	C	0.60	75%	34	41	2,126	C	0.61	2,133	C	0.61			
	E. of Site	120006	17,700	27,000	7	6.22%	1,457	2,092	C	0.60	25%	11	14	2,104	C	0.60	2,106	C	0.60			
	E. of Broadway	120006	17,700	27,000	7	6.22%	1,457	2,092	C	0.60	20%	9	11	2,101	C	0.60	2,103	C	0.60			
	E. of Joel Blvd.	120086	14,600	24,000	7	7.36%	1,295	1,983	C	0.57	15%	7	8	1,990	C	0.57	1,991	C	0.57			
Broadway Ave.,	N. of SR 80	231	6,100	6,400	4	2.00%	284	320	D	0.43	5%	2	3	322	D	0.44	323	D	0.44			

1 AGR for roadways was calculated based the historical traffic data obtained from Florida Traffic Online webpage and Lee County Traffic Count Report.

2 Current peak hour peak season peak direction traffic volumes for all roadways were obtained from the 2024 Lee County Public Facilities Level of Service and Concurrency Report