February 10, 2026

Katherine Burgess
Lee County Development of Community Development
Planning Section
1500 Monroe Street
Fort Myers, Florida 33901

RE: SR82 Freeman CPA - CPA2025-00011
Insufficiency Response #1

Dear Ms. Burgess,

Enclosed please find responses to Staff's insufficiency comments dated *December 12th, 2025*. The following items are resubmitted to address staff comments and reflect the updates proposed to the boundary:

New Files:
1. Exhibit M10 - Affidavit of Authorization (CPA)
2. Exhibit M13 - FEMA Firmette Flood Insurance Rate Map
3. Exhibit M13 - Indigenous Preserve Management Plan & Exhibits (1.2026)

Revised Files:
1. Revised Exhibit M1 - CPA Application
2. Revised Exhibit M7 - Legal Description and Sketch
3. Revised Exhibit M7 - Boundary Survey
4. Revised Exhibit M10 - Title Certification
5. Revised Exhibit M12 - Lee Plan Analysis
6. Revised Exhibit M13 - Environmental Assessment Report with PSS & E-Code Vegetation Map & Exhibits
7. Revised Exhibit M13 - Topographic Map (USGS)
8. Revised Exhibit M13 - Ground and Surface Water Resources Report
9. Revised Exhibit M14 - Historic Resources Impact Analysis (with Archaeological Sensitivity Zones Map)
10. Revised Exhibit M16 - Traffic Circulation Analysis
11. Revised Exhibit M17 - Letters of Determination for Service
12. Revised Exhibit M19 - Justification of Proposed Amendment

DOT Review by: John Podczerwinsky

TIS:

1. TIS Page 3: Add Willowbrook Lane as a non-County maintained ingress/egress easement which connects at the SW corner of proposed development. (Note: There is no need to change traffic distribution to include the roadway at this time).

   RESPONSE: The TIS was not revised to include any language about Willowbrook Lane as this roadway is not paved and not part on any analysis in the report and not relevant to the actual analysis conducted. Just because easements touch properties does not mean that they must be included in a traffic impact study.

2. Table 1A - Please revise all SR 82 segments to C3R context classification. The future context classification has not yet been determined and may not support C3C classification. Visit: Link for FDOT's preliminary context classification determinations on State roads. Note: Changing to C3R will revise the calculated capacity for these segments on the subsequent table.

   RESPONSE: Table 1A was revised to reflect SR 82 as a C3R Context Classification and the Level of Service thresholds were adjusted accordingly.

3. Table 2A - Adjust traffic impact analyses to match C3R capacity for segments revised on Table 1A. It is requested to show the V/C ratio on this table for each segment consistent with those demonstrated on Table 4A. Table 3A - Please revise all SR 82 segments to C3R context classification. The future context classification has not yet been determined and may not support C3C classification. Visit: Link for FDOT's preliminary context classification determinations on State roads. Note: Changing to C3R will revise the calculated capacity for these segments on the subsequent table.

   RESPONSE: Table 2A was revised to reflect the Level of Service determination based on the C3R Level of Service thresholds. The v/c was not reported in this table as this is a long-range analysis and v/c is not relevant in a 2045 analysis.

4. Table 4A - Growth Rates: Demonstrate the base year and number of years calculated for the growth rates on SR 82 and Sunshine Blvd. (The remainder of segments are understood to have insufficient traffic count data and a minimum 2% annual growth rate is accepted).

   RESPONSE: Included in the Appendix of the TIS is the FDOT Traffic Trends spreadsheet and graph that depicts the methodology utilized to compute the compound growth rate for each roadway segment identified based on the historical traffic data from the FDOT Traffic Online resource.

5. Table 4A - Adjust traffic impact analyses to match C3R capacity for segments revised on Table 3A.

   RESPONSE: Table 4A was revised based on the C3R service volume thresholds.

DOT:

1. Correct the statement in Narrative Section IV, second bullet. Access is taken from SR 82, a State maintained arterial roadway.

   RESPONSE: Corrected in the Lee Plan Analysis.

2. Informational Comment: Access Management (LDC Sec. 10-285 & 10-294): The Master Concept Plan should consider provisions (e.g., cross-access easements/stub-outs) for connecting to adjacent non-County-maintained roadways, specifically Willowbrook Ln and potentially Sleepy Hollow Rd. Providing this allowance will support future compliance with LDC Sec.10-285 and may ensure the maintenance of sufficient emergency access capability, thereby mitigating the future need to request a potential deviation from the 'two-access point' requirement of LDC Sec. 10-294. The applicant is encouraged to open dialogue with County staff to discuss the possibility of access provisions to non-State roadways prior to submittal of the zoning application.

RESPONSE: In addition to the comments in #1 of the transportation section, Willow Lane is an unpaved access easement through a highly rural and residential area. The uses that are permitted in the Tradeport land use category are a mix of commercial and light industrial. The employment center proposed for this location will serve the local residential population with work and serves near the dense rooftops in Lehigh Acres, but the uses must be directed away form and be managed to protect the more rural areas to the south, east and west of this proposed development. This would include seeking alternative accesses points on SR82 through cross-access points to the properties to the east and west near the SR82 frontage and not in the southern portions of this site where large lot, rural homes would be affected by industrial and commercial traffic. These cross accesses are being accounted for in our site plan.

There are several policies in the LeePlan that restrict directing commercial and industrial traffic through residential areas. Policy 7.1.7 states that, "Industrial development will not be permitted if it allows industrial traffic to travel through predominantly residential areas." Policy 5.1.5 states to, "Protect existing and future residential areas from any encroachment of uses that are potentially destructive to the character and integrity of the residential environment." It is for these reasons and consistency with the LeePlan that the access easements abutting this property have not been considered as access points for this project.

3. Informational Comment: Access to Adjacent Projects: Access to adjacent projects (e.g., School property) is not guaranteed by any finding of sufficiency for this project or the concept master plan included. Execution of one or more cross-access agreement(s) may be necessary to secure and formalize required connectivity.

RESPONSE: Acknowledged.

Environmental Review by: Nicholas DeFilippo

1. Please provide a topographic map depicting the property boundaries and 100-year flood prone areas indicated (as identified by FEMA).

   RESPONSE: Please see the topographic and 100-year flood area map.

2. Please provide a map delineating the property boundaries on the most recent Flood Insurance Rate Map.

   RESPONSE: Please see the Flood Insurance Rate map.

3. Please provide 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).

   RESPONSE: See the revised Environmental Assessment Report with PSS & E-Code Vegetation Map & Exhibits. The table of plant communities by FLUCCS map has been updated to include the listed species common to each FLUCCS area.

4. The applicant is proposing to amend the Wetlands FLU category. Please provide an approved Formal Jurisdictional Determination from the applicable State agency to support request.

   RESPONSE: A wetland determination is being pursued through the SFWMD; a site visit is likely to be scheduled with SFWMD staff in spring. Bear Paws is working through that process currently.

5. 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.

   RESPONSE: The Lee Plan Analysis document has been expanded to include an analysis of these policies.

6. Please provide analysis of Lee Plan policies 33.1.1, 33.1.4, 33.1.7, 33.2.1, 33.2.5, 60.1.1, 60.1.2, 61.1.6, 123.1.5, 123.2.4, 126.1.1 and 126.1.4.

   RESPONSE: The Lee Plan Analysis document has been expanded to include an analysis of these policies.

7. The subject property contains several wetlands that are mapped as Historic Flowways. The site seems to have the potential to provide wetland interconnectivity restoring historic hydroperiods, consistent with Lee Plan Map 2-E, and re-establish the historic flowway in accordance with Lee Plan policies 60.1.3 and 60.4.3. Please provide analysis demonstrating how the proposed Map Amendment is consistent with these Lee Plan policies.

   RESPONSE: The Applicant has evaluated Lee Plan Policies 60.1.3 and 60.4.3, as well as the concept of restoring principal flow-way systems to the extent practicable within the limits of the proposed project and applicable regulatory approvals. As detailed in the Characterization of Ground and Surface Water Resources report, the

site has been extensively altered, and no practicable opportunity exists to reestablish historic hydrologic features. Surface water generally flows southward, and the stormwater management system has been designed to replicate this historic flow direction.

The proposed stormwater system has been engineered to meet South Florida Water Management District (SFWMD) Environmental Resource Permit (ERP) requirements, including maintaining pre development discharge rates and volumes, providing appropriate water quality treatment, and preventing adverse impacts to adjacent properties and preserved areas.

The project is not intended to receive offsite flows or function as a regional conveyance system. Incorporating such a connection would require substantial redesign of the stormwater management system, including increased conveyance capacity, storage volume, and additional control structures. These modifications would fundamentally alter onsite drainage and introduce operational, and liability concerns associated with accepting offsite stormwater.

8. Please provide a map of aquifer recharge areas. The applicant only provided a map identifying habitat types.

   RESPONSE: Acknowledged. The model and report to be completed and submitted in the near future.

Legal Review by: Richard Burris

1. **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.

   RESPONSE: A revised legal sketch and description has been provided in response to these comments.

   The metes and bounds legal description does not close. The seventh line on the sketch is missing from the description.

   RESPONSE: A revised legal sketch and description has been provided in response to these comments.

   The legal description sketch provided does not include a state plan coordinate at the POB and one at an opposing corner.

   RESPONSE: A revised legal sketch and description has been provided in response to these comments.

A formal jurisdictional wetland determination has not been included in the submittal. A Jurisdictional Determination approved by SFWMD or Florida DEP must be submitted to modify the existing depiction of wetlands.

RESPONSE: A wetland determination is being pursued through the SFWMD; a site visit is likely to be scheduled with SFWMD staff. Bear Paws is working through that process currently.

Natural Resources Review by: Nicholas DeFilippo

1. The applicant is requesting to amend the DR/GR FLU category. Please provide an Integrated Surface and Groundwater to support the analysis of Lee Plan policies 2.3.1 and 2.3.2. Staff cannot make a formal finding without this additional information.

   RESPONSE: The ICPR model is being prepared as part of the SFWMD ERP permitting. This model will then be utilized to prepare the integrated model which will be provided with the next submittal package.

2. The application indicates that the Sandstone aquifer is the intended irrigation source. Staff has concerns that use of this aquifer may impact the domestic water source in the region. Many of the single-family homes in the area utilize the Sandstone aquifer as a domestic water source. Please utilize an alternative aquifer or blend multiple sources to reduce potential impacts.

   RESPONSE: See Section 4.0 of the Characterization of Ground and Surface Water Resources Report. "A review of reclaimed water infrastructure indicates that no such pipelines are located in proximity to the property. Consequently, all irrigation demands will be met primarily using surface water captured in onsite stormwater management lakes, with seasonal augmentation from groundwater on an as-needed basis. The conceptual site layout includes several stormwater management lakes, designed to capture, store, and reuse stormwater for irrigation, thereby reducing reliance on groundwater resources. During periods of prolonged drought, however, surface water availability within the lakes may be limited. In such instances, lake levels are proposed to be minimally supplemented using groundwater from the Mid-Hawthorn Aquifer."

3. Please provide a comprehensive analysis of Lee Plan policies 2.3.1 and 2.3.2. Please provide data demonstrating that the proposed land use will not cause significant impact on present or future water resources. Please revise the analysis to address each component of 2.3.2.

   RESPONSE: The Applicant has evaluated Lee Plan Policies 2.3.1 and 2.3.2 and the proposed project will not have any significant impact on present or future water resources as detailed in Sections 4.0 and 5.0 of the Characterization of Ground and Surface Water Resources Report. Findings are also supported by the 90-day no recharge groundwater flow modeling results included in the report. In regard to Policy 2.3.2, the proposed source for irrigation has been revised to originate from the confined mid-Hawthorn to further separate and protect adjacent existing legal users and is consistent with the SFWMD Reginal Water Supply Plan. Therefore, the proposed project will not cause any significant harm to present and

future public water resources. The proposed land use also does not contribute to urban sprawl.

Planning Review by: Katherine Burgess

1. No analysis was provided on how the proposed map amendment is consistent with the SE Lee Community Plan Area. Add analyses on the applicable portions of Goal 33 as they relate to this request. This analysis must include an analysis of how the application will overcome the commercial threshold in Policy 33.2.5.

   RESPONSE: The proposed request is not consistent with this policy as the policy stands at the time of this response. There is a private Lee Plan amendment to remove this "cap" by removing this policy from the Lee Plan and amending criteria of the SE Lee County planning community to allow the proposed type of development in this application. This private request and several others have resulted in a comprehensive staff-initiated amendment to SE Lee County planning community. The draft language of the amendments, which includes elimination of this policy, seem to support this land use change. The elimination of this policy and the proposed amendments are necessary for this application to be consistent with the Lee Plan.

2. The application materials appear to be missing a Letter of Availability for EMS. Contact Public Safety to request a letter and include a copy with the resubmittal.

   RESPONSE: Please see the Letter of Availability from Lehigh Acres Fire included in the Letters of Determination for Service document.

3. Note: The requested FLU map amendment will only apply to the uplands portion of the property. Per Objective 1.5, all state-identified wetlands are considered part of the "Wetlands" FLUC.

   RESPONSE: A wetland determination is being pursued through the SFWMD; a site visit is likely to be scheduled with SFWMD staff. Bear Paws is working through that process currently. Currently, the project is designed to preserve approximately 87 percent (68.83 acres) of the probable wetlands as mapped by BearPaws in the Environmental Assessment Report and Species Survey report. The property has been divided up into conservation areas, restored habitats, and open space, while minimizing impacts from development. Restoration efforts will include re-establishing native plant communities, control invasive vegetation, and maintaining hydrologic conditions to support long-term ecological function.

4. The subject property is within the Southeast Lee Community Plan Area. Staff cannot find the application sufficient until the Public Input meeting has been completed and the documentation required in Policy 17.3.4 is included with the application materials.

   RESPONSE: Acknowledged. A public information meeting will be held in early spring.

Zoning Review by: Peter Blackwell

1. HISTORIC: Please provide a map of the Archaeological Sensitivity Zones on the subject property.

   Please provide an amended Historic Resources Impact Analysis that describes what effect the proposed plan amendment will have on the state- designated historic resources.

   RESPONSE: The property does contain one previously recorded historic resource (including structure, districts, and/or archaeologically sensitive areas). An email and map have been secured from the Division of Historical Resources - Florida Department of State which is included in this document. There are no significant historical resources that may be impacted.

   The Ground and Surface Water Resources Report also provides a historic summary. This recorded feature is located in the northeast portion of a site and occupies about 15 acres. This triangular raised berm was constructed for World War II military training exercises which significantly altered the natural hydrology by disrupting the predevelopment surface-water flow patterns. Similar historic military features are common along the south side of State Highway 82.

   Based on the Florida Land Use and Cover Classification System (FLUCCS) mapping from the South Florida Water Management District (SFWMD), approximately 92.5 acres (roughly 50 percent) of the site are classified as improved pasture. Historic aerial photography indicates that much of this area was intensively drained to support past agricultural activities both on and adjacent to the site. Numerous ditches and swales traverse the central and southern portions of the property, reflecting extensive hydrologic modification. These features also facilitated the drainage of historic wetlands, including a large circular wetland in the south-central portion that has been bisected by an east–west drainage ditch, contributing to the site's highly disturbed condition. Remaining natural communities identified by the SFWMD include pine and oak forest, palmetto prairie, hydric pine, wet prairie, and cypress heads. Despite these significant alterations, the property lies within Lee County's Density Reduction/Groundwater Resource (DR/GR) area.

2. Informational Comment: Companion rezoning required and filed under DCI2025-00023 (pending intake).

   RESPONSE: Acknowledged.

Document: Exhibit M10 - Affidavit of Authorization by: Katherine Burgess

Exhibit M10 -- Affidavit of Authorization appears to be unsigned and not notarized. Provide a signed and notarized version per the application requirements. If this is a duplicate of Exhibit M3, remove it from the application materials.

RESPONSE: Please see the signed Affidavit of Authorization – CPA specific.

Document: Exhibit M12 - Lee Plan Analysis by: Katherine Burgess

1. Page 2: The application mentions the wetlands being placed in a conservation easement according to EEPCO policies; however, the application materials do not request to be added to the EEPCO. Clarify the intent of this language or remove if necessary.

   RESPONSE: This was unintentional and has been removed.

2. Page 4: The analysis of Policy 1.4.5 states that the map amendment is intended to support the companion rezone application. This is not analysis of this policy or justification for this request. Additionally, only one of the three subsections of this policy was included. Provide an analysis, potentially using data from the hydrology report, of how the property and the requested FLUM amendment is or is not consistent with all portions of the DR/GR policy.

   RESPONSE: The response has been expanded to include the DR/GR analysis as follows:

   1. New land uses in these areas that require rezoning or a development order must demonstrate compatibility with maintaining surface and groundwater levels at their historic levels utilizing hydrologic modeling, the incorporation of increased storage capacity, and inclusion of green infrastructure. The modeling must also show that no adverse impacts will result to properties located upstream, downstream, as well as adjacent to the site. Offsite mitigation may be utilized, and may be required, to demonstrate this compatibility. Evidence as to historic levels must be submitted as part of the rezoning application and updated, if necessary, as part of the mining development order application.

   RESPONSE: The change requires that we show no impact on ground water quality consistent with the requirements of the DR/GR. In a report by David Brown of Respec, the modelling presented shows the project will maintain surface and groundwater levels at their historic levels and increase storage capacity.

   A prominent feature of the northern portion of the property is a raised earthen berm constructed for World War II military training exercises. This triangular berm, occupying approximately 15 acres (about 8 percent of the site), significantly alters the natural hydrology of the northern section by disrupting predevelopment surface-water flow patterns. Similar historic military features are common along the south side of State Highway 82 and are easily identifiable in aerial imagery.

   Based on the Florida Land Use and Cover Classification System (FLUCCS) mapping from the South Florida Water Management District (SFWMD), approximately 92.5 acres (roughly 50 percent) of the site are classified as improved pasture. Historic aerial photography indicates that much of this area was intensively drained to support past agricultural activities both on and adjacent to the site. Numerous itches and swales traverse the central and southern portions of the property, reflecting extensive hydrologic modification. These features also facilitated the drainage of historic wetlands, including a large circular wetland in the south-central portion that has been bisected by an east–west drainage ditch, contributing to the site's highly disturbed condition. Remaining natural communities identified by the SFWMD include pine and oak forest, palmetto prairie, hydric pine, wet prairie, and cypress heads. Despite these significant

alterations, the property lies within Lee County's Density Reduction/Groundwater Resource (DR/GR) area.

Given the extent of previous disturbance, the proposed development presents an opportunity to restore hydrologic connections and enhance surface water communication with the surrounding DR/GR lands to the south. The stormwater management system will be designed to reestablish historic flow patterns, allowing seasonal high surface waters to move toward the southeastern portion of the property, consistent with predevelopment drainage conditions. The military training berm will be removed, and the reclaimed area will be integrated into the site plan.

In alignment with the project's hydrologic restoration goals, the proposed irrigation system will utilize surface water stored within dedicated stormwater–irrigation supply ponds (wet detention areas) to offset groundwater use. The recycling and reuse of stormwater will not only reduce reliance on groundwater for irrigation but also enhance overall water quality through natural settling and filtration processes. These same ponds will also promote recharge to the underlying aquifer systems, providing additional benefits to the DR/GR area.

The irrigation system will be designed to seasonally supplement stored surface water with groundwater on an as-needed basis, thereby reducing overall groundwater demand while maintaining irrigation reliability. Pre- and post-construction monitoring will be conducted to evaluate hydrologic performance, water quality improvements, and system efficiency. Collectively, these measures advance hydrologic restoration, water conservation, and resource protection consistent with the policies and objectives of the Lee Plan, establishing a robust framework for groundwater and surface-water protection within the DR/GR.

2. Permitted land uses include agriculture, natural resource extraction and related facilities, conservation uses, public and private recreation facilities, and residential uses at a maximum standard density of one dwelling unit per ten acres (1 du/10 acres). See Objectives 33.2 and 3.3 for potential density adjustments resulting from concentration or transfer of development rights.

RESPONSE: The property is currently used as agricultural pasture and has an active AG Exemption. The use will continue through this amendment process and in the future until a development order is secured that is in line with the potential move to Tradeport.

3. Private Recreational Facilities may be permitted in accordance with the site locational requirements and design standards, as further defined in Goal 13. No Private Recreational Facilities may occur within the DR/GR land use category without a rezoning to an appropriate Planned Development zoning category, and compliance with the Private Recreation Facilities performance standards, contained in Goal 13.

RESPONSE: Not applicable. No private recreational facilities are being proposed.

3. Page 5: This analysis correctly states that Tradeport includes environmental protections with industrial and commercial use allowances; however, it does not provide any commentary on how the subject property is consistent with the Tradeport description.

Use data and details on the existing conditions to provide an analysis of how the subject property is consistent with the Tradeport Future Land Use Category.

RESPONSE: The proposed development is for 170,000 sf of stand-alone retail uses. The total acreage is 186.50 acres of which 68.8 acres (per pending SFWMD JD and ERP) are to be preserved wetlands. The site plan proposes that 9.9 acres of wetlands are impacted and then considered to be Tradeport if permitted to be impacted per the SFWMD ERP leaving the site to contain 68.8 acres of wetlands and 117.7 acres of Tradeport to be part of the calculation for retail uses. Pending the ERP at 1 acre per 10 acres of Tradeport or wetlands the acreage permitted to be dedicated to stand alone retail is a maximum of 18.6 acres. The 170,000 sf of retail and hotel fit within this acreage limitation and is placed in the area of SR82 frontage per the MCP.

4. Page 5: The subject property is currently designated as a Future Non-Urban Area and the proposed amendment would designate it as a Future Suburban Area. Provide an analysis of existing Future Urban Areas and why they are not suitable for this project as it applies to Objectives 2.1 and 2.2.

   RESPONSE: The Tradeport land use category is considered a suburban category. This is an important distinction as the urban categories such as commercial, intensive, central urban, and urban community are not appropriate given the proximity to the rural character of the area south of SR82 and the policies in the Lee Plan pertaining to the DR/GR and SE Lee County planning community. By virtue of their location, the County's current development patterns, and the available and potential levels of public services, areas with the future urban designation are suited to accommodate high densities and intensities in areas that have the highest level of urban services.

   The subject property is in close proximity to the urban area of Lehigh Acres. Extending urban designations into the DR/GR and SE Lee County area is inconsistent with the Lee Plan. In a supportive role to an urban area a suburban category offers supportive services particularly applicable in this case. Lehigh Acres urban area is predominantly dens single-family houses with little supporting retail, commercial and light industrial employment and services. The property will logically extend LCU services by extending, at developers cost, the services lines from the Lee County School District site and other urban services are in place making a suburban category compatible with the area south of SR82 while supporting the existing infrastructure and needs to the north.

   Development in the urban categories offer no additional limits or protection to more sensitive environmental areas like suburban land use categories, particularly Tradeport.

5. Page 7: The analysis for Policy 2.3.1 states that the project will utilize on-site well and septic systems until LCU service becomes available on site. This appears to conflict with the response for Objective 4.1. Clarify when well and septic will be utilized.

   RESPONSE: The project is intended to connect to LCU provided utilities. The narrative has been corrected.

6. Page 7: The preservation of wetlands and stormwater management are characteristics of the rezone and a comprehensive plan amendment cannot be conditioned to match a potential rezone. Provide an analysis using data from the hydrology report/environmental study to demonstrate how the proposed future land use map amendment complies and is consistent with Policy 2.3.1.

RESPONSE:
IRRIGATION
A review of existing reclaimed water infrastructure indicates that no such pipelines are located in proximity to the property. Consequently, all irrigation demands will be met primarily using surface water captured in onsite stormwater management lakes, with seasonal augmentation from groundwater on an as-needed basis. The conceptual site layout includes several stormwater management lakes, designed to capture, store, and reuse stormwater for irrigation, thereby reducing reliance on groundwater resources. During periods of prolonged drought, however, surface water availability within the lakes may be limited. In such instances, lake levels are proposed to be minimally supplemented using groundwater from the Sandstone Aquifer. Based on the most recent engineering schematics, approximately 12.41 acres of common areas will require irrigation, and it is estimated that up to two (2) Sandstone Aquifer wells may be needed to augment surface water supplies during dry periods.

An analysis of irrigation requirements was performed using the SFWMD modified Blaney-Criddle irrigation allocation spreadsheet. The 12.41 acres of landscape will require an annual allocation of 15.94 million gallons (or 43,669 gallons per day). These quantities are proposed to be roughly split (halved) by the two proposed irrigation pumping facilities.

The combined use of surface and groundwater for irrigation is expected to optimize water resource conservation, ensuring that groundwater withdrawals are minimized whenever sufficient surface water is available. This integrated approach enhances the project's sustainability and contributes to the long-term protection and resilience of the area's natural water resources.

FUTURE IMPACTS
Given the extent of previous disturbance, the proposed development presents an opportunity to restore hydrologic connections and enhance surface water communication with the surrounding DR/GR lands to the south. The stormwater management system will be designed to reestablish historic flow patterns, allowing seasonal high surface waters to move toward the southeastern portion of the property, consistent with predevelopment drainage conditions. The military training berm will be removed, and the reclaimed area will be integrated into the site plan.

The engineered stormwater management system is designed to emulate pre-development hydroperiods, capturing, conveying, and attenuating surface water flows to minimize offsite impacts while promoting groundwater recharge. Concurrently, targeted wetland restoration activities, including enhancement of native wetland vegetation, will reinstate the site's natural water retention and filtration functions. The systematic removal of nuisance and exotic plant species will further support hydrologic function by improving surface water flow, reducing evapotranspiration from invasive species, and allowing native flora to stabilize

soil and enhance groundwater-surface water interactions. Collectively, these measures are expected to significantly enhance the site's hydrologic character, restore ecological functionality, and integrate the property into the regional water balance and DR/GR hydrologic network.

7. Page 8: The response to Policy 2.3.2 states that the proposed amendment is supported by data but does not explain what that data is. Provide data and analysis to this response.

   RESPONSE: Additional narrative has been added as follows:

   1. analyze the proposed allowable land uses to determine the availability of irrigation and domestic water sources; and,

   An analysis of irrigation requirements was performed using the SFWMD modified Blaney-Criddle irrigation allocation spreadsheet. The 12.41 acres of landscape will require an annual allocation of 15.94 million gallons (or 43,669 gallons per day). These quantities are proposed to be roughly split (halved) by the two proposed irrigation pumping facilities.

   The combined use of surface and groundwater for irrigation is expected to optimize water resource conservation, ensuring that groundwater withdrawals are minimized whenever sufficient surface water is available. This integrated approach enhances the project's sustainability and contributes to the long-term protection and resilience of the area's natural water resources.

   2. identify potential irrigation and domestic water sources, consistent with the Regional Water Supply Plan. Since regional water suppliers cannot obtain permits consistent with the planning time frame of the Lee Plan, water sources do not have to be currently permitted and available, but they must be reasonably capable of being permitted; and,

   There are three (3) principal aquifer systems underlying the subject property: 1) the unconfined Surficial Aquifer System (SAS), 2) the confined Intermediate Aquifer System (IAS), and 3) the confined Floridan Aquifer System (FAS). Please note that, in order to simplify the nomenclature used in this report, the colloquial term "Water Table Aquifer" will be used interchangeably to describe the SAS, and the term "Sandstone Aquifer" will be used to describe the upper producing unit of the IAS. In central Lee County, groundwater quality decreases rapidly with depth and potable supplies generally occur at depths of less than 300 feet below land surface (bls). Below these depths, groundwater becomes highly mineralized, saline, and is typically artesian. Consequently, groundwater is primarily withdrawn from depths shallower than 300 feet bls.

   Suitable water quality and quantity for agricultural or commercial irrigation at the project location is available from both the Water Table and Sandstone Aquifers. However, based on the hydrogeology in the vicinity of the property, the overall yield of the Water Table Aquifer is considered low and may only be acceptable for low volume livestock watering. Therefore, the confined Sandstone Aquifer has been utilized locally.

   3. present data and analysis that the proposed land uses will not cause any significant harm to present and future public water resources; and,

The proposed development represents a significant opportunity to restore and enhance a property that has been extensively disturbed and hydrologically compromised. The development incorporates a multifaceted water resource management strategy, prioritizing the protection, preservation, and enhancement of both surface and groundwater systems within the designated DR/GR area. Key components include engineered stormwater management infrastructure, targeted retention and detention systems, and systematic removal of exotic and nuisance vegetation, collectively designed to restore natural hydrologic connectivity, promote aquifer recharge, and improve downstream water quality. The integrated approach aligns with applicable regional water management objectives, including maintenance of wetland function and compliance with DR/GR policies, and demonstrates a proactive commitment to sustainable land use practices. Overall, the project is anticipated to substantially improve ecological function, enhance hydrologic resilience, and provide long-term environmental benefits on a property historically characterized by significant hydrologic alteration.

4. supply data and analysis specifically addressing urban sprawl.

In addition to the answers above the location of this development is purposeful to support the lack of available large-scale properties for employment centers and retail services abutting Lehigh Acres. The urban services needed to support this are or will be available to be extended to this property within the most aggressive entitlement and construction timelines.

8. Page 8: This sentence appears to state that it is not the applicant's intent to connect to a public system nor to provide its own system. Revise the sentence to provide clarification on the intent.

   RESPONSE: Sentence has been clarified that the intent is to connect to LCU services.

Document: Exhibit M1 - CPA Application by: Katherine Burgess

1. Page 1: This application should be indicated as an Expedited State Review.

   RESPONSE: The application has been updated to indicate Expedited State Review.

2. Page 1: Provide a table/list of all the consultants working on this application with contact information and affiliations.

   RESPONSE: A list of all the consultants has been provided with this submittal.

3. Page 5: The CPA application affidavit appears to be unsigned and not notarized. Provide a signed and notarized version, per the application requirements.

   RESPONSE: A signed/notarized CPA application affidavit has been provided.

Document: Exhibit M11 - Proposed FLU Map 1-A Amendment by: Katherine Burgess

1. Page 1: Note: The requested FLU map amendment will only apply to the uplands portion of the property. Per Objective 1.5, all state-identified wetlands are considered part of the "Wetlands" FLUC.

   RESPONSE: Understood. A JD is in process, and an ERP is being sought as well.

Document: Exhibit M19 - Justification of Proposed Amendment: Katherine Burgess

1. Page 1: This percentage appears to be significantly lower than the references to preserve area in the rest of the application materials; specifically, the response to Policy 54.1.2 states that 68.83 acres of the 78.67 acres of wetlands, approximately 87%, on site will be preserved. Clarify or revise.

   RESPONSE: Revised.

2. Page 1: This is not justification for a Future Land Use Map amendment. Use data and analysis of the existing conditions, the proposed change, and how the change will be beneficial to the surrounding community. It may be helpful to use data from the Lehigh Commercial Study, conduct an independent commercial study for SE Lee, and policies and objectives from the Economic Development element of the comprehensive plan.

   RESPONSE: The justification has been rewritten with data and deeper analytic narrative.

Thank you in advance for your consideration of the above information. If you have any further questions, please do not hesitate to contact me directly at 239.344.0000 or fdrovdlic@rviplanning.com.

Sincerely,

RVi Planning + Landscape Architecture

Fred Drovdlic, AICP
Director of Planning

Lee County Community Development

APPLICATION FOR A COMPREHENSIVE PLAN AMENDMENT - MAP

Project Name: SR82 Freeman CPA

Project Description: Comprehensive Plan map amendments to add the property to the Tradeport future land use category, amend Maps 4-A and 4-B to designate the Property in the Lee County Utilities (LCU) services area to connect to centralized potable water and sanitary sewer services, and amend Table 1(b) to allocate acreage to the Tradeport future land use category in Southeast Lee County Planning Community. The CPA will be accompanied by a request to rezone the 186.5 +/- acres from AG-2 to Mixed-Use Planned Development (MPD) to allow for 1,750,000 sf of commercial, office, hotel, and light industrial uses.

Map(s) to Be Amended: Lee Plan Map 1-A, Maps 4-A and 4-B

State Review Process: ☐ Small-Scale Review ☐ State Coordinated Review ☒ Expedited State Review

RECEIVED
FEB 13 2026
COMMUNITY DEVELOPMENT

1. **Name of Applicant:** Brian Freeman of Brian Scott Holdings, Inc.
   Address: 4245 Fowler Street
   City, State, Zip: Fort Myers, Florida 33901
   Phone Number: 239-226-4236 E-mail: bfreeman@thefreemanlawfirmpa.com

2. **Name of Contact:** Fred Drovdlic, AICP
   Address: RVi Planning and Landscape Architecture, 1514 Broadway, Suite 201
   City, State, Zip: Fort Myers, FL 39901
   Phone Number: 239-318-6707 E-mail: fdrovdlic@rviplanning.com

3. **Owner(s) of Record:** Brian Freeman of Brian Scott Holdings, Inc., and BJ Holdings of Fort Myers, LLC
   Address: 4245 Fowler Street
   City, State, Zip: Fort Myers, Florida 33901
   Phone Number: 239-226-4236 E-mail: bfreeman@thefreemanlawfirmpa.com

4. **Property Location:**
   1. Site Address: 17700 and 17800 State Road 82and access undetermined
   2. STRAP(s): 13-45-26-00-00001.002A, 13-45-26-00-00001.0020, 24-45-26-00-00001.2000, 24-45-26-00-00001.3000, and 24-45-26-00-00001.8000

5. **Property Information:**
   Total Acreage of Property: 186.5 Total Acreage Included in Request: 186.5
   Total Uplands: 117.7 Total Wetlands: 68.8 Current Zoning: AG-2
   Current Future Land Use Category(ies): DR/GR and Conservation Wetland
   Area in Each Future Land Use Category: DRGR 37.9%, Conservation Wetland 62.1%
   Existing Land Use: undeveloped vacant land

6. **Calculation of maximum allowable development under current Lee Plan:**
   Residential Units/Density: 16 Commercial Intensity: 0 Industrial Intensity: 0

7. **Calculation of maximum allowable development with proposed amendments:**
   Residential Units/Density: 0 Commercial Intensity: 500,000 sf Industrial Intensity: 1,250,000 sf

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)

X	Completed Application (Exhibit – M1)
X	Disclosure of Interest (Exhibit – M2)
X	Surrounding Property Owners List, Mailing Labels, and Map For All Parcels Within 500 Feet of the Subject Property (Exhibit – M3)
X	Existing Future Land Use Map (Exhibit – M4)
X	Map and Description of Existing Land Uses (Not Designations) of the Subject Property and Surrounding Properties (Exhibit – M5)
X	Map and Description of Existing Zoning of the Subject Property and Surrounding Properties (Exhibit – M6)
X	Signed/Sealed Legal Description and Sketch of the Description for Each FLUC Proposed (Exhibit – M7)
X	Copy of the Deed(s) of the Subject Property (Exhibit – M8)
X	Aerial Map Showing the Subject Property and Surrounding Properties (Exhibit – M9)
X	Authorization Letter from the Property Owner(s) Authorizing the Applicant to Represent the Owner (Exhibit – M10)
X	Proposed Amendments (Exhibit – M11)
X	Lee Plan Analysis (Exhibit – M12)
X	Environmental Impacts Analysis (Exhibit – M13)
X	Historic Resources Impact Analysis (Exhibit – M14)
X	Public Facilities Impacts Analysis (Exhibit – M15)
X	Traffic Circulation Analysis (Exhibit – M16)
X	Existing and Future Conditions Analysis - Sanitary Sewer, Potable Water, Surface Water/Drainage Basins, Parks and Rec, Open Space, Public Schools (Exhibit – M17)
X	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)
X	State Policy Plan and Regional Policy Plan (Exhibit – M19)
X	Justification of Proposed Amendment (Exhibit – M20)
X	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.

AFFIDAVIT

I, Brian Freeman, certify that I am the owner or authorized representative of the property described herein, and that all answers to the questions in this application and any sketches, data, or other supplementary matter attached to and made a part of this application, are honest and true to the best of my knowledge and belief. I also authorize the staff of Lee County Community Development to enter upon the property during normal working hours for the purpose of investigating and evaluating the request made through this application.

Signature of Applicant

2/9/24
Date

Brian Freeman
Printed Name of Applicant

STATE OF FLORIDA
COUNTY OF LEE

The foregoing instrument was sworn to (or affirmed) and subscribed before me by means of ☒ physical presence or ☐ online notarization on 2/10/24 (date) by Brian Freeman (name of person providing oath or affirmation), who is personally known to me or who has produced _____ (type of identification) as identification.

Signature of Notary Public

Carmen Torres
(Name typed, printed or stamped)

NOTARY PUBLIC STATE OF FLORIDA
CARMEN TORRES
Commission # HH 745950
Expires December 2, 2029

ADDITIONAL AGENTS

Company Name:	RVi Planning + Landscape Architecture		
Contact Person:	Fred Drovdlic, AICP		
Address:	1514 Broadway, Suite 201		
City, State, Zip:	Fort Myers, FL 33901		
Phone Number:	239-989-3370	Email:	fdrovdlic@rviplanning.com

Company Name:	Atwell, LLC		
Contact Person:	Jackie Larocque		
Address:	10150 Highland Manor Dr., Suite 450		
City, State, Zip:	Tampa, FL 33610		
Phone Number:	(239) 908-3415	Email:	jlarocque@atwell.com

Company Name:	Pavese Law Firm		
Contact Person:	Neale Montgomery		
Address:	1833 Hendry Street		
City, State, Zip:	Fort Myers, FL 33902		
Phone Number:	239-336-6235	Email:	nealemontgomery@paveselaw.com

Company Name:	TR Transportation Consultants, Inc.		
Contact Person:	Ted Treesh		
Address:	2726 Oak Ridge Ct. STE 503		
City, State, Zip:	Fort Myers, FL 33901		
Phone Number:	239-278-3090 x 1	Email:	tbt@trtrans.net

AFFIDAVIT

I, Brian Freeman, certify that I am the owner or authorized representative of the property described herein, and that all answers to the questions in this application and any sketches, data, or other supplementary matter attached to and made a part of this application, are honest and true to the best of my knowledge and belief. I also authorize the staff of Lee County Community Development to enter upon the property during normal working hours for the purpose of investigating and evaluating the request made through this application.

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2/9/24
Date

Brian Freeman
Printed Name of Applicant

STATE OF FLORIDA
COUNTY OF LEE

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Signature of Notary Public

Carmen Torres
(Name typed, printed or stamped)

CARMEN TORRES
Commission # HH 745950
Expires December 2, 2029

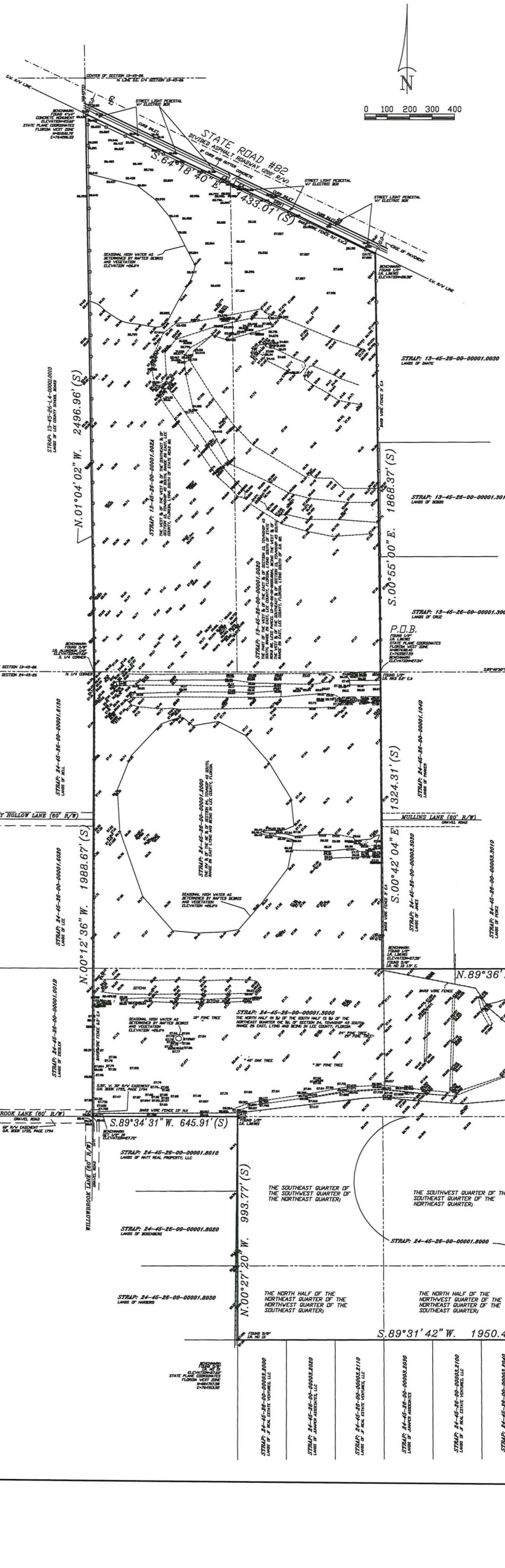
BOUNDARY SURVEY OF:

A PLOT OR PARCEL OF LAND LYING IN A PORTION OF SECTIONS 13 AND 24, TOWNSHIP 45 SOUTH, RANGE 26 EAST, LEE COUNTY, FLORIDA

DESCRIPTION PER TITLE OPINION:

A PLOT OR PARCEL OF LAND LYING IN A PORTION OF SECTIONS 13 AND 24, TOWNSHIP 45 SOUTH, RANGE 26 EAST, LEE COUNTY, FLORIDA, SAID PLOT OR PARCEL BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS:
COMMENCING AT THE NORTHEAST CORNER OF SAID SECTION 24, THENCE RUN S.89°40'32"W. ALONG THE NORTH LINE SAID SECTION 24 FOR 1281.81 FEET, TO THE POINT OF BEGINNING; THENCE RUN S.00°42'04"E. FOR 1324.31 FEET; THENCE RUN N.89°36'24"E. TO A POINT LYING ALONG THE EAST LINE OF SAID SECTION 24 FOR 1289.65 FEET; THENCE RUN S.01°02'28"E. TO THE EAST QUARTER SAID SECTION 24 FOR 1322.96 FEET; THENCE RUN S.01°11'36"E. ALONG THE EAST LINE OF SAID SECTION 24 330.74 FEET; THENCE RUN S.89°31'42"W. FOR 1950.49 FEET; THENCE RUN N.00°27'20"W. FOR 993.77 FEET; THENCE RUN S.89°34'31"W. FOR 645.91 FEET;
THENCE RUN N.00°12'36"W. TO THE NORTH QUARTER CORNER SAID SECTION 24, FOR 1988.67 FEET; THENCE RUN N.01°04'02"W. TO A POINT LYING ALONG THE SOUTHWESTERLY RIGHT OF WAY LINE OF STATE ROAD 82 (SR82) FOR 2496.96 FEET; THENCE RUN S.64°18'40"E. ALONG SAID SOUTHWESTERLY RIGHT OF WAY OF STATE ROAD 82 (SR82) FOR 1433.01 FEET; THENCE RUN S.00°55'00"E. FOR 1868.37 FEET, TO THE POINT OF BEGINNING.

CONTAINING: 8,124,715.5 SQ. FT., OR 186.5 ACRES±.



LEGEND:

●	SET #4 IRON ROD (CAP LS #6515)
○	FOUND IRON ROD (I.R.)
□	CONCRETE MONUMENT (C.M.)
P.R.M.	PERMANENT REFERENCE MONUMENT
P.C.P.	PERMANENT CONTROL POINT
P.U.E.	PUBLIC UTILITY EASEMENT
D.E.	DRAINAGE EASEMENT
L.M.E.	LAKE MAINTENANCE EASEMENT
P.C.	POINT OF CURVATURE
P.T.	POINT OF TANGENCY
O.R.	OFFICIAL RECORDS BOOK
(S)	AS PER SURVEY
(M)	AS MEASURED
(P)	AS PER PLAT
(D)	AS PER DEED
(1)	CURVE NUMBER
L1	LINE NUMBER
R/W	RIGHT-OF-WAY
℄	CENTERLINE
R.W.B.	RECLAIM WATER BOX
W.M.	WATER METER
W.V.	WATER VALVE
F.H.	FIRE HYDRANT
O/H	OVERHEAD POWER
P.P.	POWER POLE
G.A.&W.	GUY ANCHOR & WIRE
E.B.	ELECTRIC BOX
N/D	NAIL & DISK
N/T.T.	NAIL & TINTAB
ELEV.	ELEVATION
B.M.	BENCHMARK
0.0	TYPICAL ELEVATION
A/C	AIR CONDITIONER
W.S.	WATER SYSTEM
P.E.	POOL EQUIPMENT
	CONCRETE
P.O.C.	POINT OF COMMENCEMENT
P.O.B.	POINT OF BEGINNING

SURVEY NOTES:

1. BASIS OF BEARING SHOWN HEREON TAKEN FROM THE SOUTH LINE OF SECTION 13, TOWNSHIP 45 SOUTH, RANGE 26 EAST, LEE COUNTY, FLORIDA AS BEING S.89°40'32"W.
2. FIELD NOTES IN 2025 FILE.
3. THIS SURVEY IS BASED ON TITLE CERTIFICATION BY PAVESE LAW FIRM, DATED DECEMBER 30, 2025.
4. UNDERGROUND STRUCTURES AND UTILITIES, IF ANY, ARE NOT INCLUDED.
5. THIS MAP/PLAT IS CONSIDERED SIGNED USING A DIGITAL SEAL IN ACCORDANCE WITH THE APPLICABLE STATE LAWS AND STATUTES FS 668.001-006; FS 668.50; FS 472.025; 5J-17.062, FLORIDA ADMINISTRATIVE CODE, STATE OF FLORIDA.
6. THIS SURVEY IS INTENDED TO BE VIEWED AS AN 24x36, 1"=200' SCALE DRAWING.
7. ELEVATIONS HEREON ARE N.A.V.D. 1988 DATUM
8. BENCHMARK DERIVED FROM NGS BENCHMARK U 533, ELEVATION =31.33 NAVD 88.

FLOOD INFORMATION:
COMMUNITY NUMBER: 125124
PANEL NUMBER 0475
SUFFIX: F
MAP NUMBER 12071C0475F
EFFECTIVE DATE: 8-28-2008
FLOOD ZONE: "X"
ELEVATION: **NOT DETERMINED**

REVISED	DESCRIPTION	BY:
12-6-25	TOPOGRAPHIC SHOTS	PMM
2-10-26	TITLE OPINION	PMM

DATE OF LAST FIELD WORK: 12-6-2025

DRAWN:	CHECK:	SCALE	PROJ. #
PMM	CJ	1"=200'	SALABAMA
SURVEY DATE		FILE NO.	SHT.- 1
9-12-2025		44-25-22	OF - 1

Phillip Mould 2026.02.12 09:32:33 -05'00'

PHILLIP M. MOULD
PROFESSIONAL SURVEYOR AND MAPPER
LS6515 - STATE OF FLORIDA

PHILLIP M. MOULD
8180 GULL LANE
FORT MYERS, FL. 33967
239-645-1348
PHILLIPMOULD@LIVE.COM

SKETCH TO ACCOMPANY DESCRIPTION

A PLOT OR PARCEL OF LAND LYING IN A PORTION OF SECTIONS 13 AND 24, TOWNSHIP 45 SOUTH, RANGE 26 EAST, LEE COUNTY, FLORIDA

SEE "EXHIBIT A" SHEET 2 OF 2
FOR DESCRIPTION TO ACCOMPANY THIS SKETCH

NOT A BOUNDARY SURVEY

SKETCH NOTES:

1. BASIS OF BEARING SHOWN HEREON TAKEN FROM THE SOUTH LINE OF SECTION 13, TOWNSHIP 45 SOUTH, RANGE 26 EAST, LEE COUNTY, FLORIDA AS BEING S.89°40'32"W.
2. SUBJECT TO EASEMENTS AND RESTRICTIONS OF RECORD.
4. THIS CERTIFICATION IS ONLY FOR LANDS DESCRIBED HEREON. IT IS NOT A CERTIFICATION OF TITLE, ZONING OR FREEDOM OF ENCUMBRANCES.
5. THIS SKETCH DOES NOT CONSTITUTE A TITLE OR EASEMENT SEARCH AND WAS BASED ON DESCRIPTION FURNISHED BY CLIENT AND/OR FOUND MONUMENTATION IN THE FIELD.
6. UNDERGROUND STRUCTURES AND UTILITIES, IF ANY, ARE NOT INCLUDED.
7. THIS MAP/PLAT IS CONSIDERED SIGNED USING A DIGITAL SEAL IN ACCORDANCE WITH THE APPLICABLE STATE LAWS AND STATUTES FS 668.001-006; FS 668.50; FS 472.025; 5J-17.062, FLORIDA ADMINISTRATIVE CODE, STATE OF FLORIDA.
8. THIS SKETCH IS INTENDED TO BE VIEWED AS AN 8 ½ x 14", 500 SCALE DRAWING.

LEGEND:

R/W	RIGHT-OF-WAY
℄	CENTERLINE
P.O.B.	POINT OF BEGINNING
P.O.C.	POINT OF COMMENCEMENT
(S)	AS SURVEYED

CENTER OF SECTION 13-45-26
N. LINE S.E. 1/4 SECTION 13-45-26
150.45'
200.0'
STATE ROAD #82
DIVIDED ASPHALT ROADWAY (200' R/W)
S.64°18'40"E. 1433.01'(S)
100.0'
S.W. R/W LINE
STRAP: 13-45-26-00-00001.0030
STRAP: 13-45-26-00-00001.3010
STRAP: 13-45-26-00-00001.3000
S.00°55'00"E. 1868.37'(S)
STRAP: 13-45-26-LA-00001.0010
N.01°04'02"W. 2496.96'(S)
S. 1/4 CORNER
N. 1/4 CORNER
S. LINE SECTION 13-45-26
N. LINE SECTION 24-45-26
P.O.B.
S.89°40'32"W. 1281.81'(S)
SECTION 13-45-26
SECTION 18-45-27
SECTION CORNER
SECTION 24-45-26
SECTION 19-45-27
P.O.C.
STRAP: 24-45-26-00-00001.0130
STRAP: 24-45-26-00-00001.1040
SUBJECT PARCEL
CONTAINING 6,184,7153 SQ. FT. OR 186.5 ACRES±
SLEEPY HOLLOW LANE
(60' R/W)
MULLINS LANE
(60' R/W)
S.00°42'04"E. 1324.31'(S)
RANGE LINE
STRAP: 24-45-26-00-00001.0060
STRAP: 24-45-26-00-00002.0000
STRAP: 24-45-26-00-00002.0010
STRAP: 24-45-26-00-00002.0020
STRAP: 24-45-26-00-00002.0030
N.89°36'24"E. 1289.65'(S)
E. LINE SECTION 24-45-26
W. LINE SECTION 19-45-27
N.00°12'36"W. 1988.67'(S)
STRAP: 24-45-26-00-00001.0020
STRAP: 24-45-26-00-00001.0018
WILLOWBROOK LANE
(60' R/W)
S.89°34'31"W. 645.91'(S)
STRAP: 24-45-26-00-00001.0010
WILLOWBROOK LANE
(60' R/W)
N.00°27'20"W. 993.77'(S)
STRAP: 24-45-26-00-00001.0020
STRAP: 24-45-26-00-00001.0030
S. LINE NE 1/4 SECTION 24-45-26
E 1/4 CORNER
S.01°02'28"E. 1322.96'(S)
CANAL (100' WIDE)
PLAT OF UNIT 59 MIRROR LAKES
PLAT BOOK 27 PAGES 83-160
930.74'
S.01°11'36"E.
S.89°31'42"W. 1950.49'(S)
RANGE LINE
STRAP: 24-45-26-00-00002.0000
STRAP: 24-45-26-00-00002.0010
STRAP: 24-45-26-00-00002.0110
STRAP: 24-45-26-00-00002.0020
STRAP: 24-45-26-00-00002.0100
STRAP: 24-45-26-00-00002.0040
STRAP: 24-45-26-00-00002.0050
STRAP: 24-45-26-00-00002.0060
STRAP: 24-45-26-00-00002.0070
STRAP: 24-45-26-00-00002.0080

N

250 0 250 500 750
SCALE IN FEET
SALABAMA

PHILLIP M. MOULD, PSM LS6515
8180 GULL LANE,
FORT MYERS, FLORIDA 33967

DESCRIPTION TO ACCOMPANY SKETCH

"EXHIBIT A"

A PLOT OR PARCEL OF LAND LYING IN A PORTION OF SECTIONS 13 AND 24, TOWNSHIP 45 SOUTH, RANGE 26 EAST, LEE COUNTY, FLORIDA

SEE SHEET 1 OF 2
FOR SKETCH TO ACCOMPANY THIS DESCRIPTION

DESCRIPTION:

A PLOT OR PARCEL OF LAND LYING IN A PORTION OF SECTIONS 13 AND 24, TOWNSHIP 45 SOUTH, RANGE 26 EAST, LEE COUNTY, FLORIDA, SAID PLOT OR PARCEL BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS: COMMENCING AT THE NORTHEAST CORNER OF SAID SECTION 24, THENCE RUN S.89°40'32"W. ALONG THE NORTH LINE SAID SECTION 24 FOR 1281.81 FEET, TO THE POINT OF BEGINNING; THENCE RUN S.00°42'04"E. FOR 1324.31 FEET; THENCE RUN N.89°36'24"E. TO A POINT LYING ALONG THE EAST LINE OF SAID SECTION 24 FOR 1289.65 FEET; THENCE RUN S.01°02'28"E. TO THE EAST QUARTER SAID SECTION 24 FOR 1322.96 FEET; THENCE RUN S.01°11'36"E. ALONG THE EAST LINE OF SAID SECTION 24 330.74 FEET; THENCE RUN S.89°31'42"W. FOR 1950.49 FEET; THENCE RUN N.00°27'20"W. FOR 993.77 FEET; THENCE RUN S.89°34'31"W. FOR 645.91 FEET; THENCE RUN N.00°12'36"W. TO THE NORTH QUARTER CORNER SAID SECTION 24, FOR 1988.67 FEET; THENCE RUN N.01°04'02"W. TO A POINT LYING ALONG THE SOUTHWESTERLY RIGHT OF WAY LINE OF STATE ROAD 82 (SR82) FOR 2496.96 FEET; THENCE RUN S.64°18'40"E. ALONG SAID SOUTHWESTERLY RIGHT OF WAY OF STATE ROAD 82 (SR82) FOR 1433.01 FEET; THENCE RUN S.00°55'00"E. FOR 1868.37 FEET, TO THE POINT OF BEGINNING.

CONTAINING: 8,124,715.5 SQ. FT., OR 186.5 ACRES±.

PHILLIP M MOULD
LICENSE NUMBER
No. LS6515
STATE OF FLORIDA
PROFESSIONAL SURVEYOR AND MAPPER

Phillip Mould
2025.12.15 10:45:58 -05'00'

PHILLIP M. MOULD
PROFESSIONAL SURVEYOR AND MAPPER
LS6515 - STATE OF FLORIDA
9-18-2025

SALABAMA

PHILLIP M. MOULD PSM LS6515
8180 GULL LANE
FORT MYERS, FL. 33967
(239)-645-1348

PAVESE
LAW FIRM

CHARLES BRYAN CAPPS
Board Certified Real Estate Attorney
Board Certified Condominium and
Planned Development Law Attorney
Direct dial: (239) 336-6219
Email: cbc@paveselaw.com

1833 Hendry Street, Fort Myers, Florida 33901 | P.O. Drawer 1507, Fort Myers, Florida 33902-1507 | (239) 334-2195 | Fax (239) 332-2243

TITLE CERTIFICATION

Pavese Law Firm (as Agent/Title Company)

Plat Number: TBD
Development Order Number: TBD

Effective Date of Title Certification: December 30, 2025

Certified To: Lee County Board of County Commissioners

I have searched the Public Records of Lee County, Florida and have examined the title to the real property more particularly described in the metes and bounds description attached hereto as Exhibit "A." I have made a careful examination of the Public Records of Lee County, Florida, with respect to the real property described in attached Exhibit "A." Based on the foregoing, we hereby certify Record Title to the above-described real property, as of the Effective Date of the Title Certification set forth above, is vested in:

Title to the property is vested in:

Brian S. Freeman, as Successor Trustee of the Jeffrey B. Freeman Trust aka Jeffrey B. Freeman Declaration of Trust dated April 9, 1986 (Parcels 1 and 2); Brian Scott Holdings, Inc., a Florida Corporation (Parcels 3 and 4); and BJ Holdings of Fort Myers, LLC (Parcel 5)

Brian S. Freeman, as Successor Trustee of the Jeffrey B. Freeman Trust aka Jeffrey B. Freeman Declaration of Trust dated April 9, 1986 (Parcels 1 and 2); Brian Scott Holdings, Inc., a Florida Corporation (Parcels 3 and 4); and BJ Holdings of Fort Myers, LLC (Parcel 5)

By: Deeds recorded in O.R. Book 4085, Page 411, O.R. Book 4085, Page 412, O.R. Book 4085, Page 413, O.R. Book 4085, Page 414, O.R. Book 4264, Page 1303, O.R. Book 4264, Page 1415, O.R. Book 4452, Page 2992, O.R. Book 4467, Page 4739, Instrument Number 2012-284382, Instrument Number 2012-284383, Instrument Number 2013-81055, Instrument Number 2013-81057, and Instrument Number 2015-37564, Public Records of Lee County, Florida.

The following are all of those persons or entities holding a mortgage secured by the property:

Mortgage from Jeffrey B. Freeman, Trustee to Real Value Properties, Inc., a Florida Corporation, recorded in O.R. Book 4264, Page 1304, Public Records of Lee County, Florida. (Note: No Satisfaction/Release found on record.) (Parcel 2)

Taxes for 2025 have been Paid. 2024 Property Taxes for Parcels 1, 2 and 5 are unpaid.

The following are all easements and rights of way affecting the property to be platted, whether recorded or unrecorded:

1. Easements described in O.R. Book 1013, Page 1257, Public Records of Lee County, Florida.
2. Utility Easements recorded in O.R. Book 933, Page 667, as assigned in O.R. Book 1091, Page 2159 and O.R. Book 1172, Page 1186, Public Records of Lee County, Florida.
3. Easements recorded in O.R. Book 1345, Page 1924, Public Records of Lee County, Florida.
4. Declaration of Easements recorded in O.R. Book 1755, Page 1794, Public Records of Lee County, Florida. (Parcels 4 and 5)

The following are other matters affecting the property:

1. Oil, gas, mineral, or other reservations as set forth in deed recorded in Deed Book 272, Page 76, O.R. Book 4516, Page 2118, Instrument Number 2024-48276, and Notices in O.R. Book 1093, Page 491 and O.R. Book 1099, Page 1646, Public Records of Lee County, Florida. No determination has been made as to the current record owner for the interest excepted herein.
2. Sewer and water covenants in Miscellaneous Book 58, Page 266; O.R. Book 10, Page 695; and O.R. Book 41, Page 264, Public Records of Lee County, Florida.
3. Survey recorded in O.R. Book 195, Page 672, Public Records of Lee County, Florida.
4. East County Water Control District as recorded in C.O. Book 38, Page 330, Public Records of Lee County, Florida.
5. Green Meadows Drainage District recorded in O.R. Book 641, Page 625, as corrected in O.R. Book 789, Page 320, Public Records of Lee County, Florida.
6. Declarations of Restrictive Covenant recorded in O.R. Book 1744, Page 2673 and O.R. Book 1774, Page 3309, Public Records of Lee County, Florida. (Parcels 4 and 5)
7. Consent Final Judgment recorded in Instrument Number 2014-236730, Public Records of Lee County, Florida.
8. Lack of access because the above-described property does not abut, and there is no private easement to, a dedicated road, street or highway. (Parcel 3)

All Recording references are to the public records of Lee County, Florida.

Note, this is not a certification of ownership of any oil, gas, and mineral rights or interests.

This certification is provided pursuant to the requirements of § 177.041, Florida Statute, for the uses and purposes specifically stated therein and is not to be used as the basis for the issuance of a title insurance commitment or policy. Pursuant to s. 627.7843, Florida Statutes, the maximum liability of the issuer of this property information report for errors or omissions in this property information report is limited to the amount paid for this property information report, and is further limited to the person(s) expressly identified by name in the property information report as the recipient(s) of the property information report.

By: _____

Charles Bryan Capps
Partner

"EXHIBIT A"

DESCRIPTION TO ACCOMPANY SKETCH

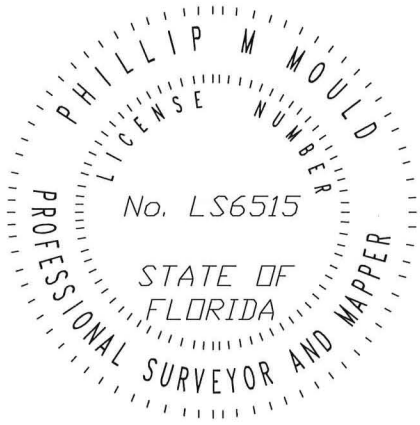
A PLOT OR PARCEL OF LAND LYING IN A PORTION OF SECTIONS 13 AND 24, TOWNSHIP 45 SOUTH, RANGE 26 EAST, LEE COUNTY, FLORIDA

SEE SHEET 1 OF 2
FOR SKETCH TO ACCOMPANY THIS DESCRIPTION

DESCRIPTION:

A PLOT OR PARCEL OF LAND LYING IN A PORTION OF SECTIONS 13 AND 24, TOWNSHIP 45 SOUTH, RANGE 26 EAST, LEE COUNTY, FLORIDA, SAID PLOT OR PARCEL BEING MORE PARTICULARLY DESCRIBED AS FOLLOWS: COMMENCING AT THE NORTHEAST CORNER OF SAID SECTION 24, THENCE RUN S.89°40'32"W. ALONG THE NORTH LINE SAID SECTION 24 FOR 1281.81 FEET, TO THE POINT OF BEGINNING; THENCE RUN S.00°42'04"E. FOR 1324.31 FEET; THENCE RUN N.89°36'24"E. TO A POINT LYING ALONG THE EAST LINE OF SAID SECTION 24 FOR 1289.65 FEET; THENCE RUN S.01°02'28"E. TO THE EAST QUARTER SAID SECTION 24 FOR 1322.96 FEET; THENCE RUN S.01°11'36"E. ALONG THE EAST LINE OF SAID SECTION 24 330.74 FEET; THENCE RUN S.89°31'42"W. FOR 1950.49 FEET; THENCE RUN N.00°27'20"W. FOR 993.77 FEET; THENCE RUN S.89°34'31"W. FOR 645.91 FEET; THENCE RUN N.00°12'36"W. TO THE NORTH QUARTER CORNER SAID SECTION 24, FOR 1988.67 FEET; THENCE RUN N.01°04'02"W. TO A POINT LYING ALONG THE SOUTHWESTERLY RIGHT OF WAY LINE OF STATE ROAD 82 (SR82) FOR 2496.96 FEET; THENCE RUN S.64°18'40"E. ALONG SAID SOUTHWESTERLY RIGHT OF WAY OF STATE ROAD 82 (SR82) FOR 1433.01 FEET; THENCE RUN S.00°55'00"E. FOR 1868.37 FEET, TO THE POINT OF BEGINNING.

CONTAINING: 8,124,715.5 SQ. FT., OR 186.5 ACRES±.



Phillip Mould
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PHILLIP M. MOULD
PROFESSIONAL SURVEYOR AND MAPPER
LS6515 - STATE OF FLORIDA
9-18-2025

SALABAMA

PHILLIP M. MOULD PSM LS6515
8180 GULL LANE
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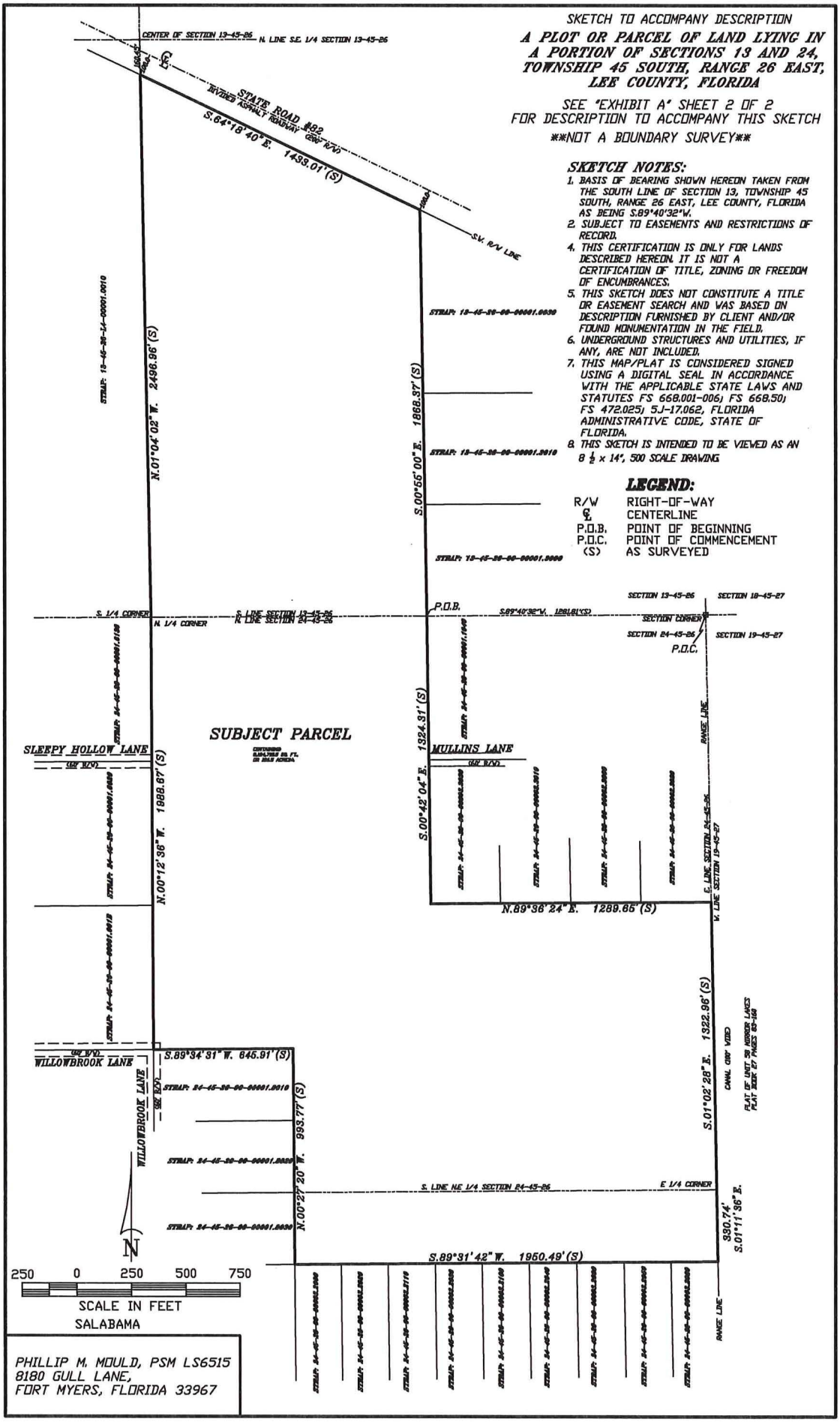
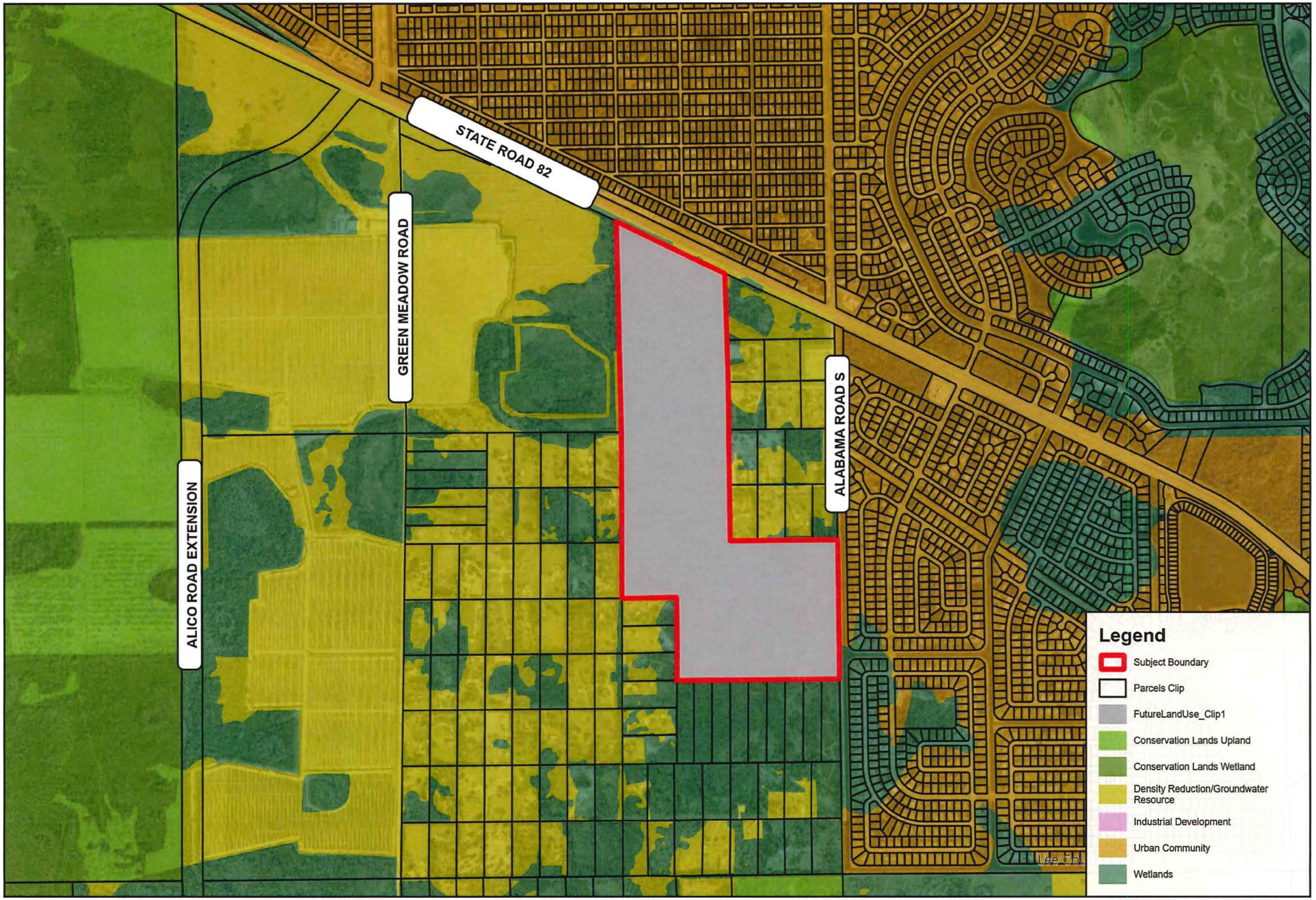
(239)-645-1348


SKETCH TO ACCOMPANY DESCRIPTION
A PLOT OR PARCEL OF LAND LYING IN A PORTION OF SECTIONS 13 AND 24, TOWNSHIP 45 SOUTH, RANGE 26 EAST, LEE COUNTY, FLORIDA
SEE "EXHIBIT A" SHEET 2 OF 2 FOR DESCRIPTION TO ACCOMPANY THIS SKETCH
NOT A BOUNDARY SURVEY
SKETCH NOTES:
1. BASIS OF BEARING SHOWN HEREON TAKEN FROM THE SOUTH LINE OF SECTION 13, TOWNSHIP 45 SOUTH, RANGE 26 EAST, LEE COUNTY, FLORIDA AS BEING S.89°40'32"W.
2. SUBJECT TO EASEMENTS AND RESTRICTIONS OF RECORD.
4. THIS CERTIFICATION IS ONLY FOR LANDS DESCRIBED HEREON. IT IS NOT A CERTIFICATION OF TITLE, ZONING OR FREEDOM OF ENCUMBRANCES.
5. THIS SKETCH DOES NOT CONSTITUTE A TITLE OR EASEMENT SEARCH AND WAS BASED ON DESCRIPTION FURNISHED BY CLIENT AND/OR FOUND MONUMENTATION IN THE FIELD.
6. UNDERGROUND STRUCTURES AND UTILITIES, IF ANY, ARE NOT INCLUDED.
7. THIS MAP/PLAT IS CONSIDERED SIGNED USING A DIGITAL SEAL IN ACCORDANCE WITH THE APPLICABLE STATE LAWS AND STATUTES FS 668.001-006; FS 668.50; FS 472.025; 5J-17.062, FLORIDA ADMINISTRATIVE CODE, STATE OF FLORIDA.
8. THIS SKETCH IS INTENDED TO BE VIEWED AS AN 8 ½ x 14", 500 SCALE DRAWING.
LEGEND:
R/W RIGHT-OF-WAY
℄ CENTERLINE
P.O.B. POINT OF BEGINNING
P.O.C. POINT OF COMMENCEMENT
(S) AS SURVEYED
CENTER OF SECTION 13-45-26
N. LINE S.E. 1/4 SECTION 13-45-26
STATE ROAD 882
BVDMES ASPHALT ROADWAY
(200' R/W)
S.64°18'40"E. 1493.01'(S)
S.W. R/W LINE
STRAP: 13-45-26-00-00001.0000
N.01°04'02"W. 2498.96'(S)
STRAP: 18-45-26-00-00001.0030
S.00°56'00"E. 1868.97'(S)
STRAP: 18-45-26-00-00001.0010
STRAP: 18-45-26-00-00001.0000
S. 1/4 CORNER
N. 1/4 CORNER
S. LINE SECTION 13-45-26
N. LINE SECTION 24-45-26
P.O.B.
S.89°40'32"W. 1281.81'(S)
SECTION 13-45-26
SECTION 18-45-27
SECTION CORNER
SECTION 24-45-26
SECTION 19-45-27
P.O.C.
SUBJECT PARCEL
CONTAINING 5,241,763 SQ. FT. OR 120.3487 ACRES
SLEEPY HOLLOW LANE
(60' R/W)
N.00°12'36"W. 1988.87'(S)
S.00°42'04"E. 1324.31'(S)
MULLINS LANE
(60' R/W)
RANGE LINE
E. LINE SECTION 24-45-26
W. LINE SECTION 19-45-27
N.89°36'24"E. 1289.65'(S)
S.89°34'31"W. 645.91'(S)
WILLOWBROOK LANE
(60' R/W)
WILLOWBROOK LANE
(60' R/W)
N.00°27'20"W. 993.77'(S)
S.01°02'28"E. 1322.96'(S)
CANAL (60' WIDE)
PLAT OF UNIT 38 MIRROR LAKES PLAT BOOK 27 PAGES 83-100
S. LINE NE 1/4 SECTION 24-45-26
E 1/4 CORNER
330.74'
S.01°11'36"E.
S.89°31'42"W. 1950.49'(S)
RANGE LINE
N
250 0 250 500 750
SCALE IN FEET
SALABAMA
PHILLIP M. MOULD, PSM LS6515
8180 GULL LANE,
FORT MYERS, FLORIDA 33967



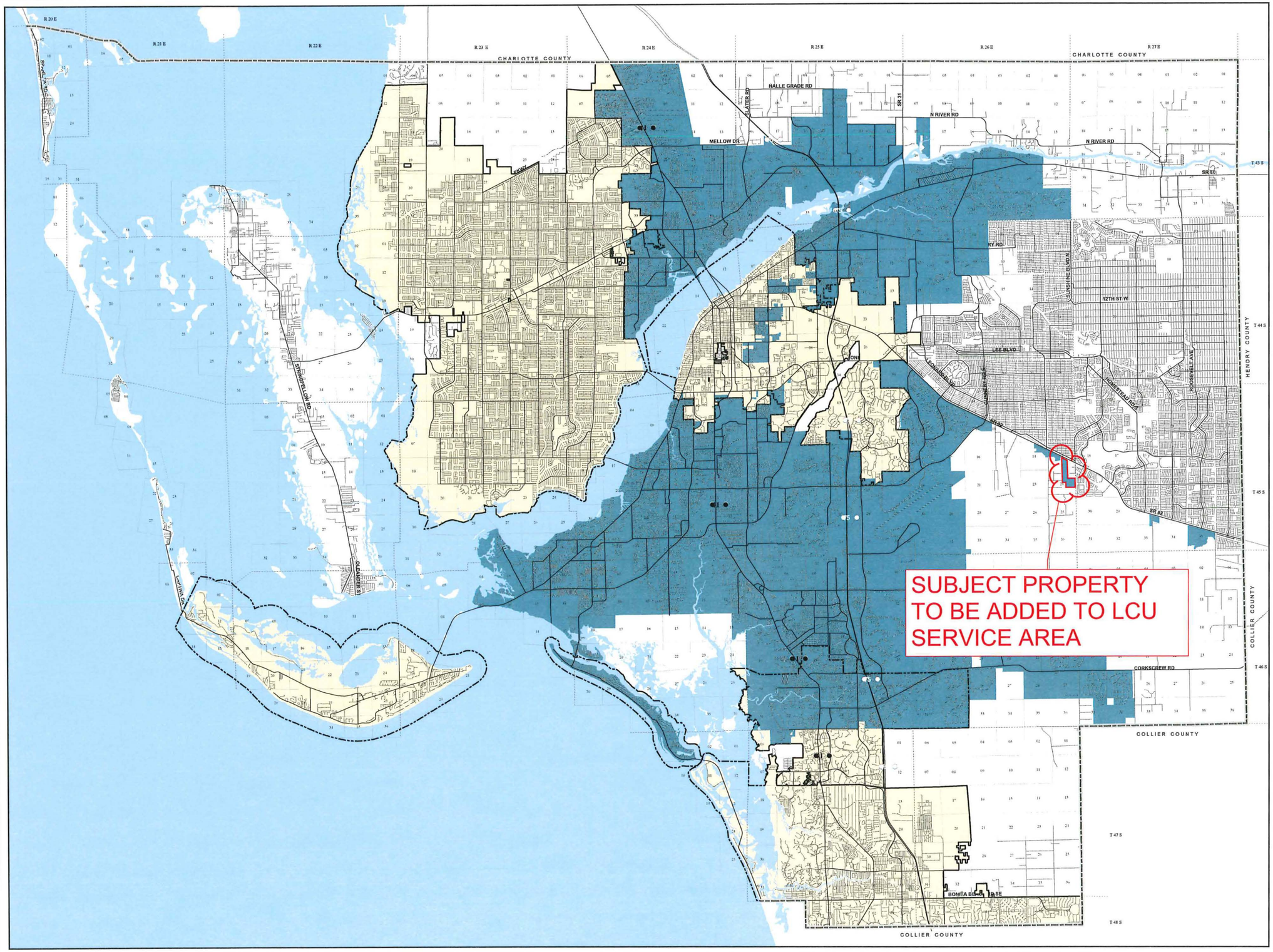
RVi
8725 Pendery Pl
Suite 101
Bradenton, FL
Tel: 941.379.8400
www.rviplanning.com

SR82 FREEMAN PARCELS • **PROPOSED FUTURE LAND USE MAP**

- Lee County
- 7/8/2025
- # 24008461
- Brian Freeman

0 750 1,500
Feet

LEE COUNTY UTILITIES FUTURE WATER SERVICE AREAS



Future Water Service Areas

City Limits

Ord. No. 89-02, 00-22, 03-19, 10-06, 10-40, 10-43, 12-24, 13-16, 14-21, 15-13, 15-14, 17-06, 17-23, 19-10, 19-25, 21-09, 22-25

Lee County
Southwest Florida

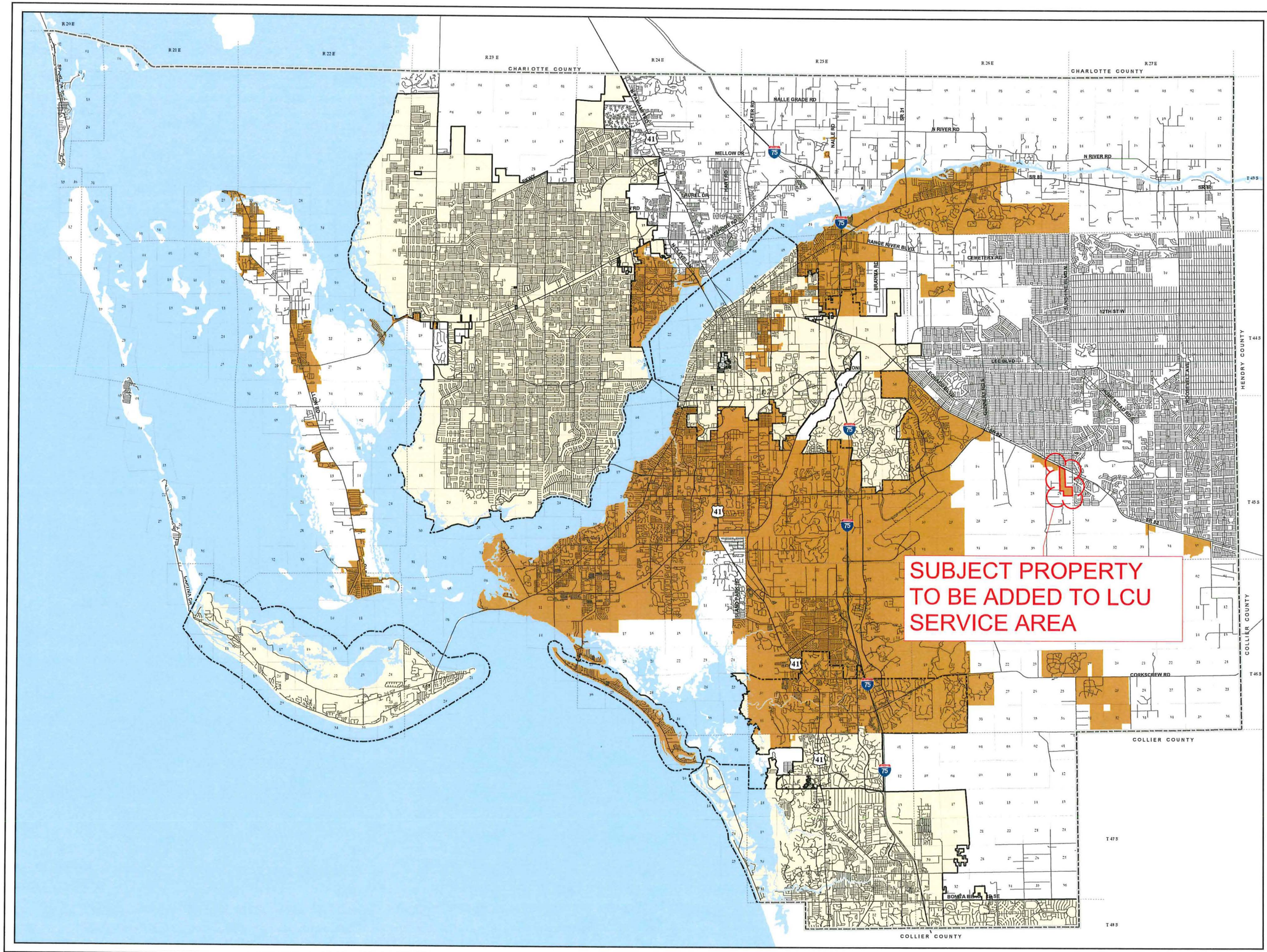
N
W E
S

0 1 2 3 4 5
Miles

Map Generated: January 2023
City limits current to date of map generation

Lee Plan Map 4-A

LEE COUNTY UTILITIES FUTURE SEWER SERVICE AREAS



Future Sewer Service Areas

City Limits

Ord. No. 89-02, 00-22, 03-19, 10-07, 10-40, 10-43, 13-16, 12-24, 14-21, 15-13, 15-14, 17-06, 17-23, 19-25

Lee County
Southwest Florida

N
W E
S

0 1 2 3 4 5
Miles

Map Generated: November 2021
City limits current to date of map generation

Lee Plan Map 4-B

I. REQUEST

Brian Freeman of Brian Scott Holdings, Inc. and BJ Holdings of Fort Myers, LLC ("Applicant") is requesting a Large-Scale Comprehensive Plan Amendment to amend:

- Future Land Use Map 1-A to move the property from the Wetlands and DR/GR Future Land Use Category (FLUC) to the Tradeport FLUC.
- The Sewer and Water Franchise Area Maps 4-A and 4-B to designate the Property in the Lee County Utilities (LCU) franchise service area.
- Table 1(b) to allocate acreage to the Tradeport future land use category in Southeast Lee County Planning Community.

The CPA will be accompanied by a request to rezone the 186.5+/- acres from AG-2 to Mixed-Use Planned Development to allow for 1,750,000 sf of commercial, office (medical office limited to 75,000 sf), hotel (250 rooms), and light industrial uses.

II. PROPERTY HISTORY

The Property is located south of State Road 82 and roughly three miles east of Daniels Parkway and SR 82 intersection, on the south side of SR 82 between Sunshine Blvd. and Alabama Road, in unincorporated Lee County, Florida. The Property is located within the Southeast Lee County Community Area. The Property is currently undeveloped on vacant land. Access is provided from State Road 82.

The map amendment will be accompanied by a requested MPD Rezone petition. The proposal will allow for a development of with a maximum of 1,750,000 sf of Commercial, Office, Hotel, and light industrial uses.

III. EXISTING CONDITIONS

The site has a long history of activity disturbing the natural environment and agricultural exemption leading to a mostly cleared property serving as pasture for over 90 acres. The earliest available aerial

imagery, dating to 1944, illustrates the triangular berm associated with the military training facility and indicates the presence of semi-connected wetland features in the northwest portion of the site. A large circular wetland in the south-central portion of the property remained undisturbed.

Agricultural use of the area increased substantially in the early 1970s, particularly along the site's eastern boundary, which bordered large-scale row crop operations. To facilitate drainage of adjacent farm fields, three large east–west ditches were excavated, including one that completely bisected the south-central circular wetland. These ditches interrupted historic surface water flow paths, a modification clearly visible in 1970 aerial imagery.

By 1995, the cumulative effects of agricultural ditching and drainage were clearly evident across the site. Parallel north–south ditches had been constructed along the southeastern boundary, extending into the adjacent forested wetland system to the south. A gridwork of row crop drainage furrows is also apparent in the south-central portion of the property. Collectively, these modifications—superimposed on the site since the early 1940s, have substantially altered natural hydrology, effectively disconnecting the property from its historical contributions to surrounding DR/GR lands.

The 186.5-acre parcel has 78.67 acres of field located flagged wetlands most of which occupy the southern third of the site. The exact area of the wetlands will be more precisely measured during South Florida Water Management District (SFWMD) Environmental Resource Permit (ERP) underway in the first quarter of 2026.

The property is in the Density Reduction/Groundwater Resource (DR/GR) and Wetlands Future Land Use Category. The site is within the Southeast Lee County Planning District, part of the Estero River Watershed and in the secondary Panther Habitat Zone. It is not within the Coastal High Hazard Area (CHHA) or an Evacuation Zone nor in any special areas or overlay districts.

Table 1: Inventory of Surrounding Lands

	FUTURE LAND USE	ZONING	EXISTING LAND USE
NORTH	Urban Community	C-2 RS-1	Vacant Commercial Single-Family Residential
SOUTH	DR/GR & Wetlands	AG-2	Single-Family Residential, Vacant Land
EAST	DR/GR & Wetlands	AG-2	Single-Family Residential, Vacant Ag Land
WEST	DR/GR & Wetlands	AG-2	Single-Family Residential, Vacant Protected Lands

To the west it abuts Lee County School Board lands and large-scale single-family residential lots. To the east it abuts Anole Canal and Mirror Lakes Subdivision. To the north it abuts State Road 82 right-of-way and across the road there are commercial and residential lots. Finally, to the south there are large-scale single-family residential lots and vacant land.

The site has access to significant urban levels services including fire, EMS, police, parks, public schools, and solid waste. It is not currently served by mass transit but has access to shared use paths existing fronting the property along State Road 82. Also, the property is not located within the Lee County Utilities Future service area, as identified on Maps 4-A (water) and 4-B (sewer), but is

requesting to be added with the intention to connect to centralized potable water and sanitary sewer infrastructure along State Road 82 that will be extended as part of this project. The applicant will be requesting to amend Maps 4-A and 4-B to designate the Property in the Lee County Utilities (LCU) services area to connect to centralized potable water and sanitary sewer services.

III. PROPOSED DEVELOPMENT

The proposed Mixed-Use Planned Development (MPD) will consist of 1,750,000 sf of commercial, office (medical office limited to 75,000 sf), hotel (250 rooms), and light industrial uses. The development is designed with a centrally located main entrance on SR82 that extends as a spine road to the proposed buildings laid out in the MCP. The southern third of the property, an area in the center, and a spot west of the proposed access point are wetlands that will be connected to restoration areas and a lake system with open space and conservation areas that occupy a minimum of 50% of the property. Overall, the program aims to preserve 87%, or 68.83 acres, of the total 78.67 acres of potential wetlands on the site.

The vision behind the request is an employment and commerce center and business park with some retail on SR 82. The project is comparable in many ways to a smaller scale Gulf Logistics (Ben Hill Griffin Parkway and I-75). The need for an employment center and services in this area is significant for two primary reasons: very limited opportunities for nonresidential uses and employment center locations in Lehigh Acres and an underserved growing population in Southeast Lee County.

The issues with the pre-platted nature of Lehigh are well known where there are few assembled lots creating larger areas where commerce and industrial parks can locate and even fewer that would not impact existing homes or platted residential lots. Yet, the Lehigh Acres community is one of the fastest growing areas in the region. And the growth in Lehigh is largely driven by comparably affordable housing generating demographics that are working class families who need jobs and need to get to jobs.

The proposed location is in an ideal location to serve an available workforce in Lehigh Acres and reduce regional commute times. Traffic in the region is a major issue, particularly commute times from Lehigh Acres south to Collier County and west to locations throughout Lee County and Cape Coral. There is a vast amount of money being spent on roadway infrastructure projects to reduce these issues, such as the Daniels and SR 82 continuous flow intersection, the SR 82 expansion, the new Alico connector, Colonial/I-75 interchange continuous flow intersection and planned improvements at Daniels/I75 interchange. Yet, one of the better solutions is to reduce the need for longer commutes by providing work and services where the people live. Providing an employment center close to Lehigh Acres is good planning practice and the location is the SE Lee planning area is in the least environmentally sensitive area and protection for the wetland areas is addressed in the Tradeport future land use policies and the limited scope of uses in the MPD.

IV. PUBLIC INFRASTRUCTURE

The Property has access to the necessary utilities to service the project, and all urban services are adequate to serve the proposed development.

- Lee County Utilities (LCU) is the closest provider. In a letter received August 6, 2025, from LCU they state, "...this project will consist of three commercial units and one industrial unit with an estimated flow demand of approximately 104,000 gallons per day. Lee County Utilities presently has sufficient capacity to provide potable water and sanitary sewer service as estimated above. Availability of potable water and sanitary sewer service is contingent upon

final acceptance of the infrastructure to be constructed by the developer". It is noted that the subject properties are not located within Lee County Utilities (LCU) Future Service Area as depicted on Maps 4A and 4B of the Lee County Comprehensive Land Use Plan but is requested to be added as part of the CPA. The developer will incur all costs associated with extending utilities to the site.

- The site offers direct access to State Road 82, a State maintained arterial roadway. The site has a singular vehicular ingress and egress point for residents. The roadway has an acceptable level of service to support the requested development according to the Traffic Impact Statement by TR Transportation.
- The site is within the Lehigh Acres Fire District and EMS service area. A letter of capacity availability was received on August 11, 2025, stating "Please consider this communication as official documentation confirming that the Lehigh Acres Fire Control and Rescue District is equipped to provide Fire Protection and EMS Transport Services for the parcels listed below, which are located within out Fire District's boundaries."
- The site is within the Lee County Sheriff's District. A letter of capacity availability was received on September 9, 2025, stating "Based on the information provided in your request, the Lee County Sherrif's Office has no objections to this request. This Agency will provide law enforcement services from out 2nd Precinct offices in Lehigh Acres."
- The site is within the Lee County Solid Waste District Area. A letter of capacity availability was received on August 12, 2025, stating "The Lee County Solid Waste Department is capable of providing solid waste collection service for the planned project consisting of 1,750,000 sf of commercial, office, hotel, and light industrial uses and a Large-Scale Comprehensive Plan Map Amendment located at 1770 and 17800 State Road 82 through our franchised hauling contractors. Disposal of the solid waste from this development will be accomplished at the Lee County Resource Recovery Facility and the Lee-Hendry Regional Landfill. Plans have been made, allowing for growth, to maintain long-term disposal capacity at these facilities."

VI. LEE PLAN COMPLIANCE

The following is an analysis of the Comprehensive Plan Amendment, and the companion Mixed-Use Planned Development (MPD), meets consistency with goals, objectives and policies of the Lee County Comprehensive Plan (Lee Plan). Other policies within the Lee Plan are analyzed in later sections showing compliance with the following:

- 1.1.13, 1.4.5, 1.4.6, 1.5, 2.1, 2.2, 2.2.1, 2.3.1, 2.3.2, 4.1.1, 4.1.2, 6.1.3, 6.1.4, 6.1.5, 6.1.6, 6.1.7, 6.1.8, 6.1.9, 6.1.10, 6.1.11, 17.3.4, 33.1.1, 33.1.4, 33.1.7, 33.2.1, 33.2.5, 54.1.6, 60.1.1, 60.1.3, 60.1.2, 60.4.2, 60.4.3, 61.1.1, 61.1.6, 61.3.6, 123.1.5, 123.2.4, 123.3, 123.4, 125.1.2, 125.1.3, 125.1.4, 126.1.1 and 126.1.4.

GOAL 1: FUTURE LAND USE MAP. To maintain and enforce a Future Land Use Map showing the proposed distribution, location, and extent of future land uses by type, density, and intensity in order to protect natural and man-made resources, provide essential services in a cost-effective manner, and discourage urban sprawl.

POLICY 1.1.13: The Tradeport future land use category includes areas of commercial and industrial lands adjacent to the airport. These areas will include developments consisting of

light manufacturing or assembly, data centers, warehousing, and distribution facilities; research and development activities; laboratories; ground transportation and airport-related terminals or transfer facilities; hotels/motels, meeting facilities; education and training facilities; and, office uses.

Stand-alone retail commercial uses intended to support and complement the surrounding business and industrial land uses are permitted if they are approved as part of a Development of Regional Impact (DRI) or Planned Development rezoning. Stand-alone retail commercial uses are limited to 1 acre out of every 10 Tradeport and preserved wetland acres within the project. To provide an incentive to preserve upland habitat, DRIs or Planned Developments may also receive additional stand-alone retail acres at the rate of 1 additional acre out of every 10 acres of preserved and enhanced uplands within the project that protect wetlands, flow-ways or occupied listed species habitat. Ancillary retail commercial uses, related directly to the sale of products manufactured or services provided in Tradeport, are allowed if they are part of a planned development. Residential uses, other than bona fide caretaker residences, are not permitted in this future land use category.

The Tradeport category supports light industrial, distribution, office, retail, and commercial uses, which are consistent with the applicant's development vision. Tradeport also has protections for environmentally sensitive areas by limiting uses, which can be further accomplished through the limited schedule of uses requested in the MPD.

The proposed development is for 170,000 sf of stand-alone retail uses. The total acreage is 186.50 acres of which 68.8 acres (per pending SFWMD JD and ERP) are to be preserved wetlands. The site plan proposes that 9.9 acres of wetlands are impacted and then considered to be Tradeport if permitted to be impacted per the SFWMD ERP leaving the site to contain 68.8 acres of wetlands and 117.7 acres of Tradeport to be part of the calculation for retail uses. Pending the ERP at 1 acre per 10 acres of Tradeport or wetlands the acreage permitted to be dedicated to stand alone retail is a maximum of 18.6 acres. The 170,000 sf of retail and hotel fit within this acreage limitation and is placed in the area of SR82 frontage per the MCP.

POLICY 1.4.5: The Density Reduction/Groundwater Resource (DR/GR) future land use category includes upland areas that provide substantial recharge to aquifers most suitable for future wellfield development. These areas also are the most favorable locations for physical withdrawal of water from those aquifers. Only minimal public facilities exist or are programmed.

1. New land uses in these areas that require rezoning or a development order must demonstrate compatibility with maintaining surface and groundwater levels at their historic levels utilizing hydrologic modeling, the incorporation of increased storage capacity, and inclusion of green infrastructure. The modeling must also show that no adverse impacts will result to properties located upstream, downstream, as well as adjacent to the site. Offsite mitigation may be utilized, and may be required, to demonstrate this compatibility. Evidence as to historic levels must be submitted as part of the rezoning application and updated, if necessary, as part of the mining development order application.

The change requires that we show no impact on ground water quality consistent with the requirements of the DR/GR. In a report by David Brown of Respec, the modelling presented

shows the project will maintain surface and groundwater levels at their historic levels and increase storage capacity.

A prominent feature of the northern portion of the property is a raised earthen berm constructed for World War II military training exercises. This triangular berm, occupying approximately 15 acres (about 8 percent of the site), significantly alters the natural hydrology of the northern section by disrupting predevelopment surface-water flow patterns. Similar historic military features are common along the south side of State Highway 82 and are easily identifiable in aerial imagery.

Based on the Florida Land Use and Cover Classification System (FLUCCS) mapping from the South Florida Water Management District (SFWMD), approximately 92.5 acres (roughly 50 percent) of the site are classified as improved pasture. Historic aerial photography indicates that much of this area was intensively drained to support past agricultural activities both on and adjacent to the site. Numerous itches and swales traverse the central and southern portions of the property, reflecting extensive hydrologic modification. These features also facilitated the drainage of historic wetlands, including a large circular wetland in the south-central portion that has been bisected by an east–west drainage ditch, contributing to the site's highly disturbed condition. Remaining natural communities identified by the SFWMD include pine and oak forest, palmetto prairie, hydric pine, wet prairie, and cypress heads. Despite these significant alterations, the property lies within Lee County's Density Reduction/Groundwater Resource (DR/GR) area.

Given the extent of previous disturbance, the proposed development presents an opportunity to restore hydrologic connections and enhance surface water communication with the surrounding DR/GR lands to the south. The stormwater management system will be designed to reestablish historic flow patterns, allowing seasonal high surface waters to move toward the southeastern portion of the property, consistent with predevelopment drainage conditions. The military training berm will be removed, and the reclaimed area will be integrated into the site plan.

In alignment with the project's hydrologic restoration goals, the proposed irrigation system will utilize surface water stored within dedicated stormwater–irrigation supply ponds (wet detention areas) to offset groundwater use. The recycling and reuse of stormwater will not only reduce reliance on groundwater for irrigation but also enhance overall water quality through natural settling and filtration processes. These same ponds will also promote recharge to the underlying aquifer systems, providing additional benefits to the DR/GR area. The irrigation system will be designed to seasonally supplement stored surface water with groundwater on an as-needed basis, thereby reducing overall groundwater demand while maintaining irrigation reliability. Pre- and post-construction monitoring will be conducted to evaluate hydrologic performance, water quality improvements, and system efficiency. Collectively, these measures advance hydrologic restoration, water conservation, and resource protection consistent with the policies and objectives of the Lee Plan, establishing a robust framework for groundwater and surface-water protection within the DR/GR.

2. Permitted land uses include agriculture, natural resource extraction and related facilities, conservation uses, public and private recreation facilities, and residential uses at a maximum standard density of one dwelling unit per ten acres (1 du/10 acres). See Objectives 33.2 and 3.3 for potential density adjustments resulting from concentration or transfer of development rights.

The property is currently used as agricultural pasture and has an active AG Exemption. The use will continue through this amendment process and in the future until a development order is secured that is in line with the potential move to Tradeport.

3. Private Recreational Facilities may be permitted in accordance with the site locational requirements and design standards, as further defined in Goal 13. No Private Recreational Facilities may occur within the DR/GR land use category without a rezoning to an appropriate Planned Development zoning category, and compliance with the Private Recreation Facilities performance standards, contained in Goal 13.

Not applicable. No private recreational facilities are being proposed.

OBJECTIVE 1.5: WETLANDS. Designate on the Future Land Use Map those lands that are identified as Wetlands in accordance with § 373.019(27), Fla. Stat. through the use of the unified state delineation methodology described in Fla. Admin. Code R. 62-340, as ratified and amended in § 373.4211, Fla. Stat.

Applicant offers a condition applicable to the MPD zoning but shown here as a reference:

Prior to the first development order issuance, an application for administrative interpretation of land use map boundaries must be applied for and processed to update the Wetland Future Land Use designation to match the state determined wetland line, consistent with Objective 1.5.

State and Federal Permits

Generally. County development permits do not create rights to obtain permits from state or federal agencies and do not create a liability on the part of the County if applicant fails to obtain requisite approvals or fulfill obligations imposed by state/federal agencies or if applicant undertakes actions resulting in a violation of state or federal law. Applicant must obtain applicable state/federal permits prior to commencing development.

State Wetland Permits. Developer may not commence construction on development impacting wetlands until issuance of required state permits. Development activity must comply with state wetland permits and applicable local development permits.

If the state does not approve wetland impacts or if State wetland permits are not consistent with proposed wetland impacts reflected in County development permits, then Developer must amend County development permit approvals to be consistent with state wetland permits and applicable Lee Plan and LDC regulations regarding development within wetlands.

GOAL 2: GROWTH MANAGEMENT. To provide for an economically feasible plan which coordinates the location and timing of new development with the provision of infrastructure by government agencies, private utilities, and other sources.

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, prevent development patterns where large tracts of land are by-passed in favor of development more distant from services and existing communities.

The proposed Comprehensive Plan Map Amendments and companion Mixed-Use Planned Development rezoning support Objective 2.1 by directing growth to a contiguous and compact employment center located along State Road 82, an established transportation corridor. The requested Tradeport future land use designation and MPD zoning will concentrate up to 1,750,000 square feet of commercial, office, hotel, and light industrial uses within a single, master-planned development rather than dispersing growth to outlying areas. This request also includes incorporating the property within the Lee County Utilities service area for future connectivity of centralized potable water and sanitary sewer which would ensure efficient provision of infrastructure, minimize public service costs, and reduces environmental impacts. By locating higher-intensity, non-residential development in proximity to existing and planned services and avoiding leapfrog development, the project promotes efficient land use, conserves natural resources, and advances compact growth patterns consistent with Objective 2.1.

The Tradeport land use category is considered a suburban category. This is an important distinction as the urban categories such as commercial, intensive, central urban, and urban community are not appropriate given the proximity to the rural character of the area south of SR82 and the policies in the Lee Plan pertaining to the DR/GR and SE Lee County planning community. By virtue of their location, the County's current development patterns, and the available and potential levels of public services, areas with the future urban designation are suited to accommodate high densities and intensities in areas that have the highest level of urban services.

The subject property is in close proximity to the urban area of Lehigh Acres. Extending urban designations into the DR/GR and SE Lee County area is inconsistent with the Lee Plan. In a supportive role to an urban area a suburban category offers supportive services particularly applicable in this case. Lehigh Acres urban area is predominantly dens single-family houses with little supporting retail, commercial and light industrial employment and services. The property will logically extend LCU services by extending, at developers cost, the services lines from the Lee County School District site and other urban services are in place making a suburban category compatible with the area south of SR82 while supporting the existing infrastructure and needs to the north.

Development in the urban categories offer no additional limits or protection to more sensitive environmental areas like suburban land use categories, particularly Tradeport.

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 F.S. 163.3164(7)) will be granted only when consistent with the provisions of Sections 163.3202(2)(g) and 163.3180, Florida Statutes and the county's Concurrency Management Ordinance.

The Comprehensive Plan Amendment supports a compact and contiguous development pattern consistent with Objectives 2.1 and 2.2 by directing growth to a strategically located site adjacent to Lehigh Acres, where urban services and roadway infrastructure are already in place. While the property is not currently within the Lee County Utilities (LCU) service area as shown on Maps 4-A and 4-B, the extension of centralized potable water and sanitary sewer infrastructure along State Road 82 is planned, continuing service already extended to the nearby school site and logically expanding to serve this project as an abutting property.

This ensures efficient use of land and resources while minimizing unnecessary infrastructure expansion. The Applicant has provided letters of availability and a detailed analysis confirming that adequate public facilities and services—including fire, police, EMS, and solid waste—are available to support the development, ensuring consistency with Florida Statutes and Lee County's Concurrency Management Ordinance. The location and proposed use efficiently utilize existing infrastructure while supplying needed services and employment opportunities to a densely populated area, aligning with Lee County's growth management objectives.

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.

The road network in the region has been constructed to support residential communities and commercial development that are dependent on access to major transportation networks. State Road 82 connects to I-75 and the future Alico Road connector to the west, and to the east State Road 29 providing ample access for all users.

Lee County Utilities (LCU) is the closest provider. In a letter received August 6, 2025, from LCU they state, "The subject property is not located within Lee County Utilities Future Service Area as depicted on Maps 4A and 4B of the Lee County Comprehensive Land Use Plan. Potable water and sanitary sewer lines are not in place but are proposed." The companion CPA case requested the extension of the LCU franchise area to this property and that connection to the future lines be made with LCU capacities determined at the time of local development order.

The site offers direct access to State Road 82, a county-maintained arterial roadway. The site has a singular vehicular ingress and egress point for residents. The roadway has an acceptable level of service to support the requested development according to the Traffic Impact Statement by TR Transportation.

The site is within the Lehigh Acres Fire District. Letters of capacity availability was received on August 11, 2025, stating "Please consider this communication as official documentation confirming that the Lehigh Acres Fire Control and Rescue District is equipped to provide Fire Protection and EMS Transport Services for the parcels listed below, which are located within out Fire District's boundaries."

The site is within the Lee County Sheriff's District. Letters of capacity availability was received on September 9, 2025, stating "Based on the information provided in your request, the Lee County Sherrif's Office has no objections to this request. This Agency will provide law enforcement services from out 2nd Precinct offices in Lehigh Acres."

The site is within the Lee County Solid Waste District Area. Letters of capacity availability was received on August 12, 2025, stating "The Lee County Solid Waste Department is capable of providing solid waste collection service for the planned project consisting of 1,750,000 sf of Commercial, Office, Hotel, and light industrial uses and a Large-Scale Comprehensive Plan Map Amendment located at 1770 and 17800 State Road 82 through our franchised hauling contractors. Disposal of the solid waste from this development will be accomplished at the Lee County Resource Recovery Facility and the Lee-Hendry Regional

Landfill. Plans have been made, allowing for growth, to maintain long-term disposal capacity at these facilities."

In the companion MPD zoning the proposed Master Concept plan is designed to increase compatibility with surrounding areas and enhance the natural environmental features of the region through the provision of expansive preserve areas and significant distances between residential lots and the project boundaries.

As a result, the proposed development is completely internalized from surrounding development. Finally, buffering, maximum building heights, and development standards are similar to other planned developments approved in the Southeast Lee County Community Area.

POLICY 2.3.1: All proposed changes to the Future Land Use Map in critical areas for future potable water supply (Lehigh Acres as described in Policy 54.1.9 and all land in the DR/GR land use category) will be subject to a special review by the staff of Lee County. This review will analyze the proposed land uses to determine the *short-term and long-term availability of irrigation and domestic water sources, and will assess whether the proposed land uses would cause any significant impact on present or future water resources.* If the Board of County Commissioners wishes to approve any such changes to the Future Land Use Map, it must make a formal finding that no significant impacts on present or future water resources will result from the change.

IRRIGATION

A review of existing reclaimed water infrastructure indicates that no such pipelines are located in proximity to the property. Consequently, all irrigation demands will be met primarily using surface water captured in onsite stormwater management lakes, with seasonal augmentation from groundwater on an as-needed basis. The conceptual site layout includes several stormwater management lakes, designed to capture, store, and reuse stormwater for irrigation, thereby reducing reliance on groundwater resources. During periods of prolonged drought, however, surface water availability within the lakes may be limited. In such instances, lake levels are proposed to be minimally supplemented using groundwater from the Sandstone Aquifer. Based on the most recent engineering schematics, approximately 12.41 acres of common areas will require irrigation, and it is estimated that up to two (2) Sandstone Aquifer wells may be needed to augment surface water supplies during dry periods.

An analysis of irrigation requirements was performed using the SFWMD modified Blaney-Criddle irrigation allocation spreadsheet. The 12.41 acres of landscape will require an annual allocation of 15.94 million gallons (or 43,669 gallons per day). These quantities are proposed to be roughly split (halved) by the two proposed irrigation pumping facilities.

The combined use of surface and groundwater for irrigation is expected to optimize water resource conservation, ensuring that groundwater withdrawals are minimized whenever sufficient surface water is available. This integrated approach enhances the project's sustainability and contributes to the long-term protection and resilience of the area's natural water resources.

FUTURE IMPACTS

Given the extent of previous disturbance, the proposed development presents an opportunity to restore hydrologic connections and enhance surface water communication with the

surrounding DR/GR lands to the south. The stormwater management system will be designed to reestablish historic flow patterns, allowing seasonal high surface waters to move toward the southeastern portion of the property, consistent with predevelopment drainage conditions. The military training berm will be removed, and the reclaimed area will be integrated into the site plan.

The engineered stormwater management system is designed to emulate pre-development hydroperiods, capturing, conveying, and attenuating surface water flows to minimize offsite impacts while promoting groundwater recharge. Concurrently, targeted wetland restoration activities, including enhancement of native wetland vegetation, will reinstate the site's natural water retention and filtration functions. The systematic removal of nuisance and exotic plant species will further support hydrologic function by improving surface water flow, reducing evapotranspiration from invasive species, and allowing native flora to stabilize soil and enhance groundwater-surface water interactions. Collectively, these measures are expected to significantly enhance the site's hydrologic character, restore ecological functionality, and integrate the property into the regional water balance and DR/GR hydrologic network.

POLICY 2.3.2: Future Land Use Map amendments to the existing DR/GR areas south of SR 82 east of I-75, excluding areas designated by the Port Authority as needed for airport expansion, which increase the current allowable density or intensity of land use will be discouraged by the County. It is Lee County's policy not to approve further urban designations there for the same reasons that supported its 1990 decision to establish this category. In addition to satisfying the requirements in Ch. 163, Part II, Fla. Stat., the Strategic Regional Policy Plan, the State Comprehensive Plan, and all of the criteria in the Lee Plan, applicants seeking such an amendment must:

1. **analyze the proposed allowable land uses to determine the availability of irrigation and domestic water sources; and,**

An analysis of irrigation requirements was performed using the SFWMD modified Blaney-Criddle irrigation allocation spreadsheet. The 12.41 acres of landscape will require an annual allocation of 15.94 million gallons (or 43,669 gallons per day). These quantities are proposed to be roughly split (halved) by the two proposed irrigation pumping facilities.

The combined use of surface and groundwater for irrigation is expected to optimize water resource conservation, ensuring that groundwater withdrawals are minimized whenever sufficient surface water is available. This integrated approach enhances the project's sustainability and contributes to the long-term protection and resilience of the area's natural water resources.

2. **identify potential irrigation and domestic water sources, consistent with the Regional Water Supply Plan. Since regional water suppliers cannot obtain permits consistent with the planning time frame of the Lee Plan, water sources do not have to be currently permitted and available, but they must be reasonably capable of being permitted; and,**

There are three (3) principal aquifer systems underlying the subject property: 1) the unconfined Surficial Aquifer System (SAS), 2) the confined Intermediate Aquifer System (IAS), and 3) the confined Floridan Aquifer System (FAS). Please note that, in order to simplify the nomenclature used in this report, the colloquial term "Water Table Aquifer" will be used interchangeably to describe the SAS, and the term "Sandstone Aquifer" will be used

to describe the upper producing unit of the IAS. In central Lee County, groundwater quality decreases rapidly with depth and potable supplies generally occur at depths of less than 300 feet below land surface (bls). Below these depths, groundwater becomes highly mineralized, saline, and is typically artesian. Consequently, groundwater is primarily withdrawn from depths shallower than 300 feet bls.

Suitable water quality and quantity for agricultural or commercial irrigation at the project location is available from both the Water Table and Sandstone Aquifers. However, based on the hydrogeology in the vicinity of the property, the overall yield of the Water Table Aquifer is considered low and may only be acceptable for low volume livestock watering. Therefore, the confined Sandstone Aquifer has been utilized locally.

3. present data and analysis that the proposed land uses will not cause any significant harm to present and future public water resources; and,

The proposed development represents a significant opportunity to restore and enhance a property that has been extensively disturbed and hydrologically compromised. The development incorporates a multifaceted water resource management strategy, prioritizing the protection, preservation, and enhancement of both surface and groundwater systems within the designated DR/GR area. Key components include engineered stormwater management infrastructure, targeted retention and detention systems, and systematic removal of exotic and nuisance vegetation, collectively designed to restore natural hydrologic connectivity, promote aquifer recharge, and improve downstream water quality. The integrated approach aligns with applicable regional water management objectives, including maintenance of wetland function and compliance with DR/GR policies, and demonstrates a proactive commitment to sustainable land use practices. Overall, the project is anticipated to substantially improve ecological function, enhance hydrologic resilience, and provide long-term environmental benefits on a property historically characterized by significant hydrologic alteration.

4. supply data and analysis specifically addressing urban sprawl.

In addition to the answers above the location of this development is purposeful to support the lack of available large-scale properties for employment centers and retail services abutting Lehigh Acres. The urban services needed to support this are or will be available to be extended to this property within the most aggressive entitlement and construction timelines.

<u>GOAL 4: GENERAL DEVELOPMENT STANDARDS</u>. 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

OBJECTIVE 4.1: WATER, SEWER, AND ENVIRONMENTAL STANDARDS. Consider water, sewer, and environmental standards during the rezoning process. Ensure the standards are met prior to issuing a local development order. (Ord. No. 17-13)

<u>STANDARD 4.1.1: WATER.</u>

1. Any new residential development that exceeds 2.5 dwelling units per gross acre, and any new single commercial or industrial development in excess of 30,000 square feet of gross

leasable (floor) area per parcel, must connect to a public water system (or a "community" water system as that is defined by Fla. Admin. Code R. 62-550).

The proposed project is a mixed-use development with no residential component and will include more than 30,000 square feet of non-residential gross leasable floor area. As a result, the development will be required to connect to a public utility system which is the current intent. No private on-site water and sewer services are intended, but connection to LCU.

This Comprehensive Plan Amendment (CPA) request seeks to add the project site to the Lee County Utilities (LCU) franchise service areas for water and sewer and to allow connection to LCU services when they become available. In the interim, the project will utilize on-site well and septic systems designed and permitted in accordance with applicable health and environmental standards, ensuring safe and temporary. The project will comply with all Lee County level-of-service standards in effect at the time of issuance of the local development order.

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 4- A), then the development must be connected to that utility.**

   The project is not located within the Lee County Utilities Future service area, as identified on Maps 4-A (water) and 4-B (sewer), but is requesting to be added with the intention to connect to centralized potable water and sanitary sewer infrastructure along State Road 82 that will be extended as part of this project.

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.**

   In a letter received August 7, 2025, from LCU they state, "The subject properties are not located within Lee County Utilities (LCU) Future Service Area as depicted on Maps 4A and 4B of the Lee County Comprehensive Land Use Plan. Potable water and sanitary sewer lines are not in operation adjacent to the properties mentioned above. The CPA request is to be added to the Lee County Utilities franchise service areas for sewer and water and then connect to LCU for sewer and water. The development will be in compliance with the level of service standards required by Lee County as determined at the time of local development order.

4. **All waterline extensions to new development will be designed to provide minimum fire flows, as well as adequate domestic services as required by Fla. Admin. Code R. 62-555.**

   The Applicant agrees to extend water lines to the new development and will be required to ensure ample flow to support fire flow levels adhering to the domestic service requirement by Fla. Admin. Code R. 62-555 at the time of local development order.

5. **If a new development is located in a certificated or franchised service area, or Lee County Utilities' future potable water service area (see Map 4-A), and the utility cannot provide the service or cannot provide the service except at a clearly unreasonable cost to the developer, the developer is encouraged to petition the appropriate regulatory agency to contract the service area so that the development may establish its own**

community water system or invite another adjacent utility to expand its service area in order to provide the required service.

The development is not yet in the LCU franchise service area; however, the franchise area has been extended to the school district property abutting to the west. The CPA request is to amend Maps 4-A to extend and be included in Lee County Utilities franchise area. The developer will be required to connect to public services and fund the necessary extensions per being in the franchise area, as part of the MPD zoning request, and by state statute based on the daily gallons per day usage rates likely being over 5,000 gallons per day for the proposed retail, commercial and industrial uses, and finally by the fact that the development will contain over 30,000 square feet of gross leasable floor area.

6. **If a development lies outside any service area as described above, the developer may:**
   - **request that the service area of Lee County Utilities or an adjacent water utility be extended to incorporate the property;**
   - **establish a community water system for the development; or**
   - **develop at an intensity that does not require a community water system.**

   The development is not yet in the LCU franchise service area; however, the franchise area is extended to the school district property abutting to the west. The CPA request is to amend Maps 4-A to extend and be included in Lee County Utilities franchise area and then connect to public services.

7. **Lee County Utilities may provide potable water service to properties not located within the future water service area when such potable water service is found to benefit public health, safety, and welfare, including protection of Lee County's natural resources.**

   As stated, the CPA is requesting to be included in the franchise area for LCU. It is a logical extension of the area that was extended to the property to the west which will be a Lee County Schools campus.

STANDARD 4.1.2: SEWER.

1. **Any new residential development that exceeds 2.5 dwelling units per gross acre, and any new single commercial or industrial development that generates more than 5,000 gallons of sewage per day, must connect to a sanitary sewer system.**

   As stated for water, the development will be well over the 30,000 square feet of non-residential gross leasable floor area and therefore will be required to connect to a public system which is not the intent. The CPA request is to be added to the Lee County Utilities franchise service areas for sewer and water and then connect to LCU for sewer and water. The development will be in compliance with the level of service standards required by Lee County.

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 4-B), 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 l/4 mile from any part of the development.**

The development is not yet in the LCU franchise service area; however, the franchise area has been extended to the school district property abutting to the west. The CPA request is to amend Maps 4-B to extend and be included in Lee County Utilities franchise area. The developer will be required to connect to public services and fund the necessary extensions. If capacity were not to exist, which has not been the case in Lee County, the developer would be required to provide their own services.

3. **If there is not sufficient capacity nor adequate infrastructure within 1/4 mile of the development, the developer must provide proof in the form of a clearly stated rejection of service.**

   In a letter received August 7, 2025, from LCU they state, "The subject properties are not located within Lee County Utilities (LCU) Future Service Area as depicted on Maps 4A and 4B of the Lee County Comprehensive Land Use Plan. Potable water and sanitary sewer lines are not in operation adjacent to the properties mentioned above. The request to connect of LCU service area will be in compliance with the level of service standards required by Lee County.

4. **If a new development is located in a certificated or franchised service area, or Lee County Utilities' future sanitary sewer service area (see Map 4-B), and the utility cannot provide the service, or cannot provide the service except at a clearly unreasonable cost to the developer, the developer may establish on a temporary basis a self-provided sanitary sewer facility for the development, to be abated when the utility extends service to the site. The developer may also petition the appropriate regulatory agency to contract the service area of the utility in order that another utility may be invited to provide the service.**

   The development is not yet in the LCU franchise service area; however, the franchise area has been extended to the school district property abutting to the west. The CPA request is to amend Maps 4-B to extend and be included in Lee County Utilities franchise area. The developer will be required to connect to public services and fund the necessary extensions and will require a letter of service capacity at time of local development order. If capacity were to not exist, which has not been the case in Lee County, the developer would be required to provide their own services.

5. **If a development lies outside any service area as described above, the developer may:**
   - **request that the service area of Lee County Utilities or an adjacent sewer utility be expanded to incorporate the property;**
   - **establish a self-provided sanitary sewer system for the development;**
   - **develop at an intensity that does not require sanitary sewer service; or**
   - **if no more than 5000 gallons of effluent per day per parcel is produced, an individual sewage disposal system per Fla. Admin. Code R. 64E-6 may be utilized, contingent on approval by all relevant authorities.**

   The development is not yet in the LCU franchise service area; however, the franchise area is extended to the school district property abutting to the west. The CPA request is to amend Maps 4-B to extend and be included in Lee County Utilities franchise area and then connect to public services.

6. **Lee County Utilities may provide sanitary sewer service to properties not located within the future sewer service area when such sanitary sewer service is found to benefit public health, safety, and welfare, including protection of Lee County's natural resources.**

   As stated above in the water section, the CPA is requesting to be included in the franchise area for LCU. It is a logical extension of the area that was extended to the property to the west which will be a Lee County Schools campus.

GOAL 7: INDUSTRIAL LAND USES. To promote opportunities for well-planned industrial development at suitable locations within the County.

POLICY 7.1.2: Industrial development is encouraged in the Industrial Development, Tradeport, and Industrial Interchange future land use categories. Industrial development in these future land use categories requiring rezoning and meeting DCI thresholds must be rezoned to a Planned Development. All rezonings to allow industrial uses outside of the Industrial Development, Tradeport, or Industrial Interchange future land use categories must be rezoned to a Planned Development, except if located within the Mixed Use Overlay. The Planned Development must be designed to arrange uses as an integrated and cohesive unit in order to: promote compatibility and screening; reduce dependence on the automobile; promote pedestrian movement within the development; utilize joint parking, access and loading facilities; avoid negative impacts on surrounding land uses and traffic circulation; protect natural resources; and, provide necessary facilities and services where they are inadequate to serve the proposed use.

The proposed Comprehensive Plan Amendment and companion Mixed-Use Planned Development (MPD) rezoning are consistent with Policy 7.1.2 by facilitating industrial and employment-based development within the Tradeport Future Land Use Category and through a unified planned development approach. The amendment relocates the subject property from the DR/GR and Wetlands categories to Tradeport, an FLUC specifically intended to accommodate industrial, office, commercial, and employment-supportive uses, and the companion rezoning from AG-2 to MPD ensures compliance with County requirements for developments exceeding Development of Critical Impact thresholds.

The proposed MPD is designed as an integrated and cohesive employment center allowing up to 1,750,000 square feet of light industrial, office, retail, and hotel uses, with internal circulation, shared access and parking strategies, and coordinated loading and service areas to reduce automobile dependence and traffic conflicts along State Road 82. The placement of the "employment center" is vital to the support needed in Lehigh Acres where such land is in short supply.

The planned development framework promotes compatibility with surrounding uses through buffering and screening, preserves a substantial portion of existing wetlands and natural features, and incorporates coordinated infrastructure and stormwater systems to protect environmental resources. Necessary public facilities and services, including water and sewer, are planned to be provided through Lee County Utilities as infrastructure becomes available, ensuring the development is adequately served while supporting the County's long-term economic development and growth management objectives.

POLICY 7.1.3: Industrial land uses must be located in areas appropriate to their special needs and constraints, including, but not limited to, considerations of: topography; choice and flexibility in site selection; access by truck, air, deep water, and rail; commuter access from home-to-work trips; and utilities; greenbelt and other amenities; air and water quality considerations; proximity to supportive and related land uses; and compatibility with neighboring uses.

The proposed Tradeport designation and companion Mixed-Use Planned Development rezoning place industrial and employment-based uses in a location that is appropriate for their operational needs and physical constraints, consistent with Policy 7.1.3

The property has direct frontage on State Road 82, a major regional arterial capable of accommodating truck traffic and providing efficient regional connectivity, with access to I-75 supporting freight movement and commuter travel. The site is also is in relative close proximity to the RSW International Airport via major arterial connections (SR82, Daniels Parkway, and Treeline or I-75).

The site's size and configuration provide flexibility in site planning. Retail and high commercial traffic is dedicated in areas closer to SR82. The large majority of sensitive environmental lands will be preserved which also serve as buffers and connection to sensitive wetlands and other areas that are rural in character. This allows for the proper location of industrial uses away from most of the abutting large lot rural residences.

Utility service is planned through Lee County Utilities with capacity to serve the proposed development by letter received from Lee County. All other necessary urban services are readily available.

Environmental considerations, including air and water quality, are addressed through wetland preservation, integrated stormwater treatment, and compliance with South Florida Water Management District and state permitting requirements.

POLICY 7.1.4: The timing and location of industrial development will be permitted only with the availability and adequacy of existing or planned services and facilities.

The proposed industrial and employment-based development is consistent with Policy 7.1.4, as its timing and location are coordinated with the availability and planned provision of necessary public facilities and services. The companion Comprehensive Plan Amendment includes amendments to the Sewer and Water Franchise Area Maps to place the subject property within the Lee County Utilities (LCU) service area, ensuring long-term provision of potable water and sanitary sewer service as planned infrastructure extensions occur along State Road 82. Transportation access is provided by State Road 82, a major arterial roadway capable of supporting industrial and commuter traffic, while internal circulation and access will be addressed through the MPD design at the time of rezoning and development order review.

POLICY 7.1.6: Maintain land development regulations that require industrial uses be adequately buffered and screened from adjacent existing or proposed residential areas so as to prevent visual blight and noise pollution.

The property is surrounded primarily by large-lot single-family residential uses and vacant lands, and the proposed MPD is intentionally designed to buffer these adjacent acreage

subdivisions through the preservation of extensive wetlands, open space, and conservation areas, which will comprise a minimum of 50 percent of the site.

The character of the property varies significantly from its northern boundary with frontage of SR82 to it southern portion that becomes much more rural and environmentally sensitive. The northern portion of the subject property is surrounded to the east and west by non-residential lands – Lee County Schools to the west and a proposed commercial planned development to the east. Approximately in center of the subject property begins large lot residential development to the east and west and these residential lots abut the boundaries from the center of the property south with the rural nature becoming more established the further south the property extends. These houses have access from Alabama Road S, Mullins, Sleepy Hollow, and Willowbrook Lanes.

Specific to the Master Concept Plan in the zoning request accompanying this CPA protection of these residential lots is provided through a minimum 30-foot type "F" perimeter buffer, wetland preservation and the strategic placement of substantial portions of development away from the southern, eastern, and western property boundaries where acreage residential uses are located. In the center of the property is a large wetland on the west side of the spine road and a large retention lake to the east. South of these two features are some areas where proposed commercial development abuts the property line to the west that will be buffered by the required buffers and setbacks for commercial or light industrial property. This is a limited area though because the majority of wetlands and sensitive areas are located over 40+ acres that occupies the entirety of the southern portion of the subject property so conditions will not be altered in this most rural portion of the area.

POLICY 7.1.7: Industrial development will not be permitted if it allows industrial traffic to travel through predominantly residential areas.

The subject property has direct frontage on State Road 82, a major arterial corridor intended to serve high-volume and truck traffic and to provide regional connectivity to I-75 and other employment centers. Site access will be designed to channel industrial and service vehicles directly to and from SR 82, with internal circulation systems that segregate truck movements from passenger vehicles and on-site pedestrian activity.

Access is limited to a single centralized entrance on State Road 82, directing traffic away from local residential roads and minimizing noise, lighting, and traffic impacts on surrounding subdivisions. No access is being proposed through the access easements mentioned above to protect these rural homes from intrusion of commercial or industrial traffic.

Through the MPD zoning and development order review processes, access management and circulation plans will be required to ensure that industrial traffic patterns remain confined to appropriate arterial facilities and do not encroach upon residential roadways, consistent with County land development regulations and traffic safety objectives.

GOAL 17: COMMUNITY PLANNING. Ensure a unified approach to community planning that complements and remains consistent with the County's overall goals, objectives, and policies.

POLICY 17.3.4: For required public information meetings, the applicant must provide the following:

- **Adequate meeting space to accommodate projected attendance and security measures (as needed).**
- **Advance notice of the meeting in a publication of local distribution provided at least ten calendar days prior to the meeting, unless otherwise specified herein.**
- **At the meeting, a general overview of the text or map amendment and effect thereof.**
- **After the meeting, a meeting summary document submitted to the County that contains the following information: the date, time, and location of the meeting; a list of attendees; a summary of the concerns or issues that were raised at the meeting; and the applicant's response to any issues that were raised**

In compliance with Policy 17.3.4, the Applicant is in the process of scheduling a public information meeting in February or early March.

GOAL 33: SOUTHEAST LEE COUNTY. Protect Southeast Lee County's natural resources through public and private acquisition and restoration efforts. Development incentives will be utilized as a mechanism to preserve, enhance, and protect natural resources, such as regional flow-ways and natural habitat corridors in the development of privately owned land. Allowable land uses will include conservation, agriculture, public facilities, low density or clustered residential, natural resource extraction operations, and private recreation facilities; allowable land uses must be compatible with protecting Southeast Lee County's environment

POLICY 33.1.1: Large-scale ecosystem integrity in Southeast Lee County should be maintained and restored. Protection and/or restoration of land is of even higher value when it connects existing corridors and conservation areas. Restoration is also highly desirable when it can be achieved in conjunction with other uses on privately owned land including agriculture.

Given the extensive hydrologic alterations that have historically occurred onsite, the proposed mixed-use development presents a strategic opportunity to restore and enhance the natural hydrologic connectivity of the property, thereby reestablishing functional interactions with the broader DR/GR area. The engineered stormwater management system is designed to emulate pre-development hydroperiods, capturing, conveying, and attenuating surface water flows to minimize offsite impacts while promoting groundwater recharge. Concurrently, targeted wetland restoration activities, including enhancement of native wetland vegetation, will reinstate the site's natural water retention and filtration functions. The systematic removal of nuisance and exotic plant species will further support hydrologic function by improving surface water flow, reducing evapotranspiration from invasive species, and allowing native flora to stabilize soil and enhance groundwater-surface water interactions. Collectively, these measures are expected to significantly enhance the site's hydrologic character, restore ecological functionality, and integrate the property into the regional water balance and DR/GR hydrologic network.

To ensure the long-term protection and sustainability of water resources within the DR/GR, the following suite of site-specific management practices is proposed for the mixed-use development. Specific measures include restrictions on the use of motorized vessels within the project's stormwater management lakes to prevent sediment resuspension, erosion, and nutrient redistribution, thereby preserving lake water quality and aquatic habitat integrity. Additionally, a detailed Enhanced Lake Management Plan (ELMP) is included below that addresses sediment control, vegetative management, and nutrient reduction strategies. Collectively, these measures establish a robust, stage-specific framework to safeguard and

sustain the hydrologic and ecological functions of the DR/GR. It is important to note that the subject property is not within a Wellfield Protection Zone.

POLICY 33.1.4: Restoration of critical lands in Southeast Lee County is a long-term program that will progress in phases based on available funding, land ownership, and natural resource priority. On individual sites, restoration can be carried out in stages:

1. Initial restoration efforts would include techniques such as filling agricultural ditches and/or establishing control structures to restore the historic water levels as much as possible without adversely impacting nearby properties.

As mentioned in the response to Policy 33.1.1. above the stormwater management system will be designed to reestablish historic flow patterns, allowing seasonal high surface waters to move toward the southeastern portion of the property, consistent with predevelopment drainage conditions. The military training berm will be removed, and the reclaimed area will be integrated into the site plan.

2. Future restoration efforts would include the eradication of invasive exotic vegetation and the reestablishment of appropriate native ecosystems based upon the restored hydrology

Per the Indigenous Management Plan, the exotic and nuisance plant removal and maintenance program will ensure the viability, value, and aesthetics of the preserve. The exotic plant removal and maintenance program will be implemented by and the responsibility of the owner or their successor. Exotic and nuisance plants often dominate native plants, which in return reduces habitat values, consequently, negatively impact aesthetic values. Exotic and nuisance plants will be killed in a manner consistent with the LDC, Section 10-415(b)(4), following current approved exotic and nuisance plant removal practices and will occur in spring and/or fall.

All small exotic saplings and exotic shrubs are to be treated in place. All large exotic trees, with greater than 4-inch DBH, will be cut at stump height and removed from the preserve area; the remaining stumps will be treated in place. Any trees too large to be practically cut will be treated standing in place, upon environmental staff approval. Any herbicides applied will be required to be EPA approved and conducted with a tracer dye. All exotic vegetation removed from the preserve area will be to be taken off- site and disposed of; there will be no exotics stockpiled within the preserve area. Any staging areas for the removal of exotic debris will be placed outside of the preserve, and the exact location will be determined by the contractor.

The County requires all Category I and II species to be removed from preserves and not exceed a level of 5 percent, per LDC Sec. 10-420(h). Native nuisance coverage will be expected to be maintained as necessary. Exotic and nuisance plants will be killed in a manner consistent with current approved removal practices; all removal practices will be conducted according to current standards and applied by a licensed herbicide applicator. The established preserve maintenance program will be conducted in perpetuity.

The on-site preserve area provides habitat for nesting and create foraging areas for all kinds of wildlife species. On-site enhancement activities will be conducted concurrently with the on-site construction activities. These enhancement activities will include the hand removal of exotic and nuisance vegetation from the upland preserve area. The exotics to be eradicated

include, but are not limited to, melaleuca (Melaleuca quinquenervia), and Brazilian pepper (Schinus terebinthifoloius). This program is incorporated into a two-phase process: the initial exotic removal and the subsequent annual maintenance.

POLICY 33.1.7: Impacts of proposed land disturbances on surface and groundwater resources will be analyzed using integrated surface and groundwater models that utilize site-specific data to assess potential adverse impacts on water resources and natural systems within Southeast Lee County. Lee County Division of Natural Resources will determine if the appropriate model or models are being utilized, and assess the design and outputs of the modeling to ensure protection of Lee County's natural resources

Staff has requested an ICPR model. The ICPR model is being prepared as part of the SFWMD ERP permitting. This model will then be utilized to prepare the integrated model which will be provided with the next submittal package.

POLICY 33.2.1: Existing acreage subdivisions are shown on Map 2-D. These subdivisions should be protected from adverse external impacts.

The property is surrounded primarily by large-lot single-family residential uses and vacant lands, and the proposed MPD is intentionally designed to buffer these adjacent acreage subdivisions through the preservation of extensive wetlands, open space, and conservation areas, which will comprise a minimum of 50 percent of the site.

The character of the property varies significantly from its northern boundary with frontage of SR82 to it southern portion that becomes much more rural and environmentally sensitive. The northern portion of the subject property is surrounded to the east and west by non-residential lands – Lee County Schools to the west and a proposed commercial planned development to the east. Approximately in center of the subject property begins large lot residential development to the east and west and these residential lots abut the boundaries from the center of the property south with the rural nature becoming more established the further south the property extends. These houses have access from Alabama Road S, Mullins, Sleepy Hollow, and Willowbrook Lanes.

Access is limited to a single centralized entrance on State Road 82, directing traffic away from local residential roads and minimizing noise, lighting, and traffic impacts on surrounding subdivisions. No access is being proposed through the access easements mentioned above to protect these rural homes from intrusion of commercial or industrial traffic.

Specific to the Master Concept Plan in the zoning request accompanying this CPA protection of these residential lots is provided through a minimum 30-foot type "F" perimeter buffer, wetland preservation and the strategic placement of substantial portions of development away from the southern, eastern, and western property boundaries where acreage residential uses are located. In the center of the property is a large wetland on the west side of the spine road and a large retention lake to the east. South of these two features are some areas where proposed commercial development abuts the property line to the west that will be buffered by the required buffers and setbacks for commercial or light industrial property. This is a limited area though because the majority of wetlands and sensitive areas are located over 40+ acres that occupies the entirety of the southern portion of the subject property so conditions will not be altered in this most rural portion of the area.

POLICY 33.2.5: Commercial uses may only be permitted if incorporated into a Mixed-Use Community, Environmental Enhancement and Preservation Community, or Rural Golf Course Community depicted on Map 2-D. The maximum commercial floor area that may be approved within the Southeast Lee County community plan area may not exceed 300,000 square feet.

The proposed request is not consistent with this policy as the policy stands at the time of this response. There is a private Lee Plan amendment to remove this "cap" by removing this policy from the Lee Plan and amending criteria of the SE Lee County planning community to allow the proposed type of development in this application. This private request and several others have resulted in a comprehensive staff-initiated amendment to SE Lee County planning community. The draft language of the amendments, which includes elimination of this policy, seem to support this land use change. The elimination of this policy and the proposed amendments are necessary for this application to be consistent with the Lee Plan.

GOAL 54: CONSERVATION. To ensure that future populations have access to potable water supplies and services at a reasonable price by using and encouraging conservation and resource management measures to reduce consumption of potable water

POLICY 54.1.2: In developing and implementing local landscape regulations including the preservation, reforestation, and wetlands restoration requirements, preference will be given to native species which are adapted to the region's climatic regime.

The site is currently undeveloped and per the preliminary environmental assessment report it is likely to contain 78.67 acres of wetlands, a total of 68.83 acres of which is to be preserved onsite per the Master Concept Plan (MCP) pending SFWMD jurisdictional determination and ERP with potential impacts as permitted by the state.

All small exotic saplings and exotic shrubs are to be treated in place. All large exotic trees, with greater than 4-inch DBH, will be cut at stump height and removed from the preserve area; the remaining stumps will be treated in place. Any trees too large to be practically cut will be treated standing in place, upon environmental staff approval. Any herbicides applied will be required to be EPA approved and conducted with a tracer dye. All exotic vegetation removed from the preserve area will be to be taken off- site and disposed of; there will be no exotics stockpiled within the preserve area. Any staging areas for the removal of exotic debris will be placed outside of the preserve, and the exact location will be determined by the contractor.

The County requires all Category I and II species to be removed from preserves and not exceed a level of 5 percent, per LDC Sec. 10-420(h). Native nuisance coverage will be expected to be maintained as necessary. Exotic and nuisance plants will be killed in a manner consistent with current approved removal practices; all removal practices will be conducted according to current standards and applied by a licensed herbicide applicator. The established preserve maintenance program will be conducted in perpetuity.

POLICY 54.1.6: Maintain development regulations that require new development to connect to a reuse water system if a system is near the development and has sufficient capacity.

In a letter from LCU, The project is not located within the Lee County Utilities Future service area, as identified on Maps 4-A (water) and 4-B (sewer), but is requesting to be added with

the intention to connect to centralized potable water and sanitary sewer infrastructure along State Road 82 that will be extended as part of this project.

GOAL 60: COORDINATED SURFACE WATER MANAGEMENT AND LAND USE PLANNING ON A WATERSHED BASIS. To protect or improve the quality of receiving waters and surrounding natural areas and the functions of natural groundwater aquifer recharge areas while also providing flood protection for existing and future development.

POLICY 60.1.1: Require design of surface water management systems to protect or enhance the groundwater.

The engineered stormwater management system is designed to emulate pre-development hydroperiods, capturing, conveying, and attenuating surface water flows to minimize offsite impacts while promoting groundwater recharge. Concurrently, targeted wetland restoration activities, including enhancement of native wetland vegetation, will reinstate the site's natural water retention and filtration functions. The systematic removal of nuisance and exotic plant species will further support hydrologic function by improving surface water flow, reducing evapotranspiration from invasive species, and allowing native flora to stabilize soil and enhance groundwater-surface water interactions. Collectively, these measures are expected to significantly enhance the site's hydrologic character, restore ecological functionality, and integrate the property into the regional water balance and DR/GR hydrologic network.

The criteria outlined in Chapter 62-40, as applied through the SFWMD ERP program, provide reasonable assurance that the surface water resources of the DR/GR will be adequately protected and maintained. By maintaining surface water systems, concomitant protection is afforded to shallow groundwater resources, particularly since the proposed stormwater management system lakes will be excavated to depths extending below the local water table. This interaction between surface and groundwater enhances groundwater recharge, thereby improving the hydrologic function and overall water resource sustainability within the DR/GR. If requested, supplemental information detailing water quality maintenance practices for the stormwater management system can be provided with the first Development Order (DO) application.

To further safeguard the resource, a single baseline surface water quality sampling event is proposed for the onsite central wetland area prior to the commencement of any construction activities. This background sampling event will provide a reference condition against which post-construction water quality can be evaluated.

POLICY 60.1.2: Incorporate, utilize, and where practicable restore natural surface water flowways and associated habitats.

Given the extensive hydrologic alterations that have historically occurred onsite, the proposed commercial development presents a strategic opportunity to restore and enhance the natural hydrologic connectivity of the property, thereby reestablishing functional interactions with the broader DR/GR area.

POLICY 60.1.3: Examine steps necessary to restore principal flow-way systems to assure the continued environmental function, value, and use of natural surface water flow-ways and associated wetland systems.

The Applicant has evaluated Lee Plan Policies 60.1.3 and 60.4.3, as well as the concept of restoring principal flow-way systems to the extent practicable within the limits of the proposed project and applicable regulatory approvals. As detailed in the Characterization of Ground and Surface Water Resources report, the site has been extensively altered, and no practicable opportunity exists to reestablish historic hydrologic features. Surface water generally flows southward, and the stormwater management system has been designed to replicate this historic flow direction.

The proposed stormwater system has been engineered to meet South Florida Water Management District (SFWMD) Environmental Resource Permit (ERP) requirements, including maintaining pre development discharge rates and volumes, providing appropriate water quality treatment, and preventing adverse impacts to adjacent properties and preserved areas.

The project is not intended to receive offsite flows or function as a regional conveyance system. Incorporating such a connection would require substantial redesign of the stormwater management system, including increased conveyance capacity, storage volume, and additional control structures. These modifications would fundamentally alter onsite drainage and introduce operational, and liability concerns associated with accepting offsite stormwater.

POLICY 60.4.2: The County encourages new developments to design their surface water management system to incorporate existing wetland systems.

Per the Stormwater Management Plan, the intent of the proposed project is to obtain a South Florida Water Management District (SFWMD) Environmental Resource Permit (ERP) during the Development Order process and to meet the requirements of Section 10-321(a) and "establish compliance" with the Land Development Code (LDC).

It is anticipated that during the SFWMD ERP modification, additional design work will be required to meet impaired water criteria for the Estero River. (Refer to separate cover for the Draft Water Quality Monitoring Plan.)

The proposed stormwater management system will consist of a series of wet detention systems that discharge into the existing regional flowway. This design approach will maintain the existing drainage patterns utilizing a piped outfall from the treatment pond to the adjacent wetland. Discharge rates under proposed conditions will be less than or equal to existing discharge flows to the wetland.

POLICY 60.4.3: The County encourages the preservation of existing natural flow-ways and the restoration of historic natural flow-ways.

Extensive past alterations to the site eliminate any practicable opportunity to reestablish historic hydrologic features. Existing surface water movement is predominantly southward, and the stormwater design reflects this historic flow pattern and has been engineered to meet all ERP criteria, including preservation of predevelopment discharge characteristics, provision of required water quality treatment, and avoidance of impacts to adjacent properties and conservation areas.

The project cannot receive offsite drainage or function as a regional conveyance system. Accommodating such flows would require major redesign and fundamentally altering onsite drainage and introducing operational and regulatory risks associated with accepting offsite stormwater.

GOAL 61: PROTECTION OF WATER RESOURCES. To protect the County's water resources through the application of innovative and sound methods of surface water management and by ensuring that the public and private construction, operation, and maintenance of surface water management systems are consistent with the need to protect receiving waters.

POLICY 61.1.1: Lee County recognizes that all fresh waters are a resource to be managed and allocated wisely and will support allocations of the resource on the basis 1) of ensuring that sufficient water is available to maintain or restore valued natural systems, and 2) of assigning to any specified use or user the lowest quality freshwater compatible with that use, consistent with financial and technical constraints.

The Applicant will obtain an Environmental Resource Permit (ERP) from the South Florida Water Management District (SFWMD). A master drainage system and preserved wetland areas are proposed with this request. These elements will be established through the ERP and subsequent development orders and are designed in compliance with this policy.

POLICY 61.1.6: When and where available, reuse water should be the first option for meeting irrigation needs of a development. Where reuse water is not available, surface water or low quality groundwater should be utilized for irrigation. All other potential water sources must be eliminated prior to selecting potable water as the sole source for meeting the irrigation needs of a development. New developments will coordinate with County staff regarding the source of irrigation water

A review of existing reclaimed water infrastructure indicates that no such pipelines are located in proximity to the property. Consequently, all irrigation demands will be met primarily using surface water captured in onsite stormwater management lakes, with seasonal augmentation from groundwater on an as-needed basis. The conceptual site layout includes several stormwater management lakes, designed to capture, store, and reuse stormwater for irrigation, thereby reducing reliance on groundwater resources. During periods of prolonged drought, however, surface water availability within the lakes may be limited. In such instances, lake levels are proposed to be minimally supplemented using groundwater from the Sandstone Aquifer. Based on the most recent engineering schematics, approximately 12.41 acres of common areas will require irrigation, and it is estimated that up to two (2) Sandstone Aquifer wells may be needed to augment surface water supplies during dry periods.

An analysis of irrigation requirements was performed using the SFWMD modified Blaney-Criddle irrigation allocation spreadsheet. The 12.41 acres of landscape will require an annual allocation of 15.94 million gallons (or 43,669 gallons per day). These quantities are proposed to be roughly split (halved) by the two proposed irrigation pumping facilities.

The combined use of surface and groundwater for irrigation is expected to optimize water resource conservation, ensuring that groundwater withdrawals are minimized whenever sufficient surface water is available. This integrated approach enhances the project's sustainability and contributes to the long-term protection and resilience of the area's natural water resources.

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.

POLICY 61.3.6: Require developments to provide surface water management systems, acceptable programs for operation and maintenance, and post-development runoff conditions that reflect the natural surface water flow rate, direction, quality, hydroperiod, and drainage basin.

The surface water system will also be required to obtain an ERP from the South Florida Water Management District at the time of DO. The proposed amendment will not impact existing infrastructure in the area, including roadways, schools, and EMS.

GOAL 123: RESOURCE PROTECTION. Manage coastal, wetland and upland ecosystems and natural resources in order to maintain and enhance native habitats, floral and faunal species diversity, water quality, and natural surface water characteristics

POLICY 123.1.5: Encourage private restoration of natural habitats to support connectivity between public and private conservation and preservation efforts.

Please refer to the attached Indigenous Preserve Management Plan provided by BearPaws Environmental, which discusses the restoration of the on-site wetlands through preservation of native species and the removal of exotics.

POLICY 123.2.4: Encourage the protection of viable tracts of sensitive or high-quality natural plant communities within developments.

The project is designed to preserve approximately 87 percent (68.83 acres) of the probable wetlands as mapped by BearPaws in the Environmental Assessment Report and Species Survey report. The property has been divided up into conservation areas, restored habitats, and open space, while minimizing impacts from development. Restoration efforts will include re-establishing native plant communities, control invasive vegetation, and maintaining hydrologic conditions to support long-term ecological function.

GOAL 125: WATER QUALITY. To ensure that water quality is maintained or improved for the protection of the environment and people of Lee County

POLICY 125.1.2: New development and additions to existing development must not degrade surface and ground water quality.

The surface water system will also be required to obtain an ERP from the South Florida Water Management District at the time of DO. The proposed amendment will not impact existing infrastructure in the area, including roadways, schools, and EMS.

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.

The surface water system will also be required to obtain an ERP from the South Florida Water Management District at the time of DO.

Policy 125.1.4 Developments which have the potential of lowering existing water quality below state and federal water quality standards will provide standardized appropriate monitoring data.

A water quality monitoring program will take place as required by the SFWMD and ERP as modified.

GOAL 126: WATER RESOURCES. Conserve, manage, and protect the natural hydrologic systems of Lee County to ensure continued water resource availability

POLICY 126.1.1: Natural water system features which are essential for retention, detention, purification, runoff, recharge, and maintenance of stream flows and groundwater levels shall be identified, protected, and managed.

Sections 4.0 and 5.0 of the Characterization of Ground and Surface Water Resources Report. Findings are also supported by the 90-day no recharge groundwater flow modeling results included in the report. The proposed source for irrigation has been revised to originate from the confined mid-Hawthorn to further separate and protect adjacent existing legal users and is consistent with the SFWMD Reginal Water Supply Plan. Therefore, the proposed project will not cause any significant harm to present and future public water resources. The proposed land use also does not contribute to urban sprawl.

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.

See Section 4.0 of the Characterization of Ground and Surface Water Resources Report. "A review of reclaimed water infrastructure indicates that no such pipelines are located in proximity to the property. Consequently, all irrigation demands will be met primarily using surface water captured in onsite stormwater management lakes, with seasonal augmentation from groundwater on an as-needed basis. The conceptual site layout includes several stormwater management lakes, designed to capture, store, and reuse stormwater for irrigation, thereby reducing reliance on groundwater resources. During periods of prolonged drought, however, surface water availability within the lakes may be limited. In such instances, lake levels are proposed to be minimally supplemented using groundwater from the Mid-Hawthorn Aquifer."

FREEMAN SR 82 – 186.52± ACRES

ENVIRONMENTAL ASSESSMENT & PROTECTED SPECIES SURVEY REPORT

Lee County STRAP #s:13-45-26-00-00001.002A, 13-45-26-00-00001.0020, 24-45-26-00-00001.2000, 24-45-26-00-00001.3000, & 24-45-26-00-00001.8000

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Introduction

There have been numerous site inspections conducted on the Freeman SR 82 property over the last several years. The most recent environmental assessment was conducted on April 30, 2025, with a protected species survey conducted on February 10, 2026. The 186.52± acre site is located in Sections 13 & 24, Township 45S, and Range 26E, of Lee County, Florida. More specifically, the site is located immediately south of SR 82, east of Green Meadow Road, and west of Alabama Road South, in Fort Myers, Florida. Please see the attached Project Location Map (Exhibit A).

An updated protected species survey was completed on February 10, 2026. The focus of this survey was within the development limits, for the purpose of conducting soil borings. This survey did not include the proposed preserve areas, as these areas will not be impacted.

The purpose of this assessment was to identify the potential for either U.S. Army Corps of Engineers (ACOE) Department of Environmental Protection (DEP), and/or South Florida Water Management District (SFWMD) jurisdictional wetlands. The site was also assessed to determine the potential of listed (endangered, threatened, etc.) species inhabiting the site that are regulated by the U.S. Fish & Wildlife Service (FWS) and the Florida Fish & Wildlife Conservation Commission (FWC).

Listed (endangered, threatened, etc.) species are regulated by the US Fish & Wildlife Service (FWS) and/or the Florida Fish & Wildlife Conservation Commission (FWC). Specific attention was paid toward that of locating any gopher tortoise (*Gopherus polyphemus*) and/or burrowing owl (*Athene cunicularia floridana*) burrows, as well as locating Florida bonneted bat (*Eumops floridanus*) or red-cockaded woodpecker (*Leuconotopicus borealis*) cavity trees, and any bald eagle (*Haliaeetus leucocephalus*) nests.

The project's surrounding land uses are a mixture of residential homes, undeveloped vacant land, forested land, and agricultural land. The surveys were conducted in the mid-morning to early afternoon; the temperatures were in the upper 60's to low 70's, with light breezes, and partly cloudy skies.

Background

The SFWMD, ACOE, and DEP are the agencies that regulate development activities in wetlands. To be considered wetlands by the SFWMD, ACOE, and/or DEP, the area should exhibit wetland hydrology, contain wetland vegetation, and have hydric soils. For an area to be considered wetlands, a site should have hydric soils, wetland hydrology, and wetland vegetation present. The property was reviewed for indicators of these parameters.

Hydric soils are identified by certain characteristics that are unique to wetland soils. Wetland hydrology is normally present if the soil is saturated or inundated for a period of time; typically, from May through November; the rainy season in Southwest Florida. In the absence of visual signs of saturation or inundation, the regulatory agencies typically use hydrologic indicators such as adventitious rooting, lichen lines, or algal matting as method of guidance. If most of the shrubs/plants that are present are those that are adapted to saturated soil conditions, it's likely wetland vegetation.

The FWS and FWC are the primary agencies that review potential impacts to listed species. The FWS reviews potential impacts and provides comments to the ACOE and DEP during the permitting process, while the FWC provides comments to the SFWMD. In general, the wildlife agency concerns need to be addressed for the permits to be authorized by the SFWMD, ACOE, and/or DEP.

Species Survey Methodology

The protected species survey methodology consisted of overlapping parallel transects performed for all FLUCFCS communities on-site. The frequency of transects performed in these habitats, unless otherwise discussed, were designed to meet the minimum coverage requirements. This method is comprised of a several step process; the vegetation communities or land-uses on the study area are delineated on an aerial photograph using the Florida Land Use, Cover and Forms Classification System (FLUCFCS). Next, these FLUCFCS codes are cross-referenced with the Protected Species List. With a list of the potential listed plants and animals, each FLUCFCS community is searched in the field for these species.

An intensive pedestrian survey is conducted using parallel belt transects that are approximately 10-20 feet apart, depending upon both the thickness of vegetation and visibility, as a means of searching for plants and animals. In addition, periodic "stop-look-listen" and quiet stalking methods are conducted for animals. Signs or sightings of these species are then recorded. The table at end of the report lists the FLUCFCS communities found on the parcel and the corresponding species which have a probability of occurring in them.

Existing Site Conditions

Boundary – The project boundary was obtained from Atwell and is assumed to be approximately 186.52± acres.

Soils - The soils on the property have been mapped by the National Resource Conservation Service (NRCS, formerly the Soil Conservation Service). These mappings are general in nature but can provide a certain level of information about the site as to the possible extent of wetland area. The agencies commonly use these mappings as justification for certain wetland/upland determinations. According to these mappings, the parcel is underlain by Pompano Fine Sand (NRCS #10; hydric), Myakka Fine Sand (NRCS #11; non-hydric), Valkaria Fine Sand (NRCS #14; hydric), Gator Muck, Frequently Ponded (NRCS #19, hydric), Pompano Fine Sand, Frequently Ponded (NRCS #27; hydric), Oldsmar Sand (NRCS #33; non-hydric), Malabar Fine Sand (NRCS #34; hydric), Malabar Fine Sand, Frequently Ponded (NRCS #44; hydric), Floridana Sand, Frequently Ponded (NRCS #51; hydric), and Malabar Fine Sand (NRCS #63; non-hydric). Please see the attached NRCS Soils Map (Exhibit D).

Vegetation Descriptions – Vegetation is one parameter used in determining the presence of uplands or wetlands; these community mappings will generally reflect what a specific area could be considered by the regulatory agencies. There were approximately 78.67± acres of wetlands and 8.62± acres of "other surface water" communities on-site, during this assessment.

While on-site, generalized community delineations are hand-drawn on an aerial defining the different vegetation associations on-site. These general delineations were based on the nomenclature of the Florida Land Use, Cover and Forms Classification System (FLUCFCS), Level III and IV (FDOT 1999). Please see the attached FLUCFCS Map with Aerial (Exhibit B) and FLUCFCS Map without Aerial (Exhibit C). Listed below are the vegetation communities and land-uses identified on the site.

FLUCFCS Codes & Community Descriptions

Uplands

The following community areas have been designated as upland habitats. Uplands are any area that does not qualify as a wetland because the associated hydrologic regime is not sufficiently wet enough to elicit development of vegetation, soils, and/or hydrologic characteristics associated with wetlands.

FLUCFCS 211 Improved Pasture – 79.50± Acres

This upland community type occupies approximately 79.50± acres. The canopy is mostly open with widely scattered slash pine (*Pinus elliottii*), live oak (*Quercus virginiana*), melaleuca *(Melaleuca quinquenervia),* and earleaf acacia *(Acacia auriculiformis)*. The sub-canopy is also mostly open with scattered cabbage palm (*Sabal palmetto*), and Brazilian pepper (*Schinus terebinthifolius*). The groundcover is dominated by bahia grass *(Paspalum notatum)* with rosy camphorweed (*Pluchea rosea*), dog fennel (*Eupatorium capillifolium*), ragweed (*Ambrosia trifida*), dollarweed (*Hydrocotyle umbellata*), caesar weed (*Urena lobata*), hairy beggar-ticks (*Bidens alba*), tickseed (*Coreopsis floridana*), frog fruit (*Phyla nodiflora*), smutgrass (*Sporobolus sp.*), false buttonweed (*Spermacoce verticillata*), three-awn grass (*Aristida purpurea*), flattop goldenrod *(Euthamia caroliniana),* and other various opportunistic weedy species. Commonly observed vines include greenbriar (*Smilax sp.)*, grapevine (*Vitis rotundifolia)*, and peppervine (*Ampelopsis arborea*). This community should be considered uplands by regulatory agencies.

FLUCFCS 213 Woodland Pasture – 5.22± Acres

This upland habitat type occupies the approximately 5.22± acres of the property. The canopy is contains live oak (*Quercus virginiana*), with scattered Australian pine (*Casuarina equisetifolia*), slash pine *(Pinus elliottii),* laurel oak (*Quercus laurifolia*), and melaleuca *(Melaleuca quinquenervia)*. The sub-canopy includes cabbage palm (*Sabal palmetto*), and Brazilian pepper (*Schinus terebinthifolius*). Ground cover contains scattered saw palmetto (*Serenoa repens*), dog fennel (*Eupatorium capillifolium*), ragweed (*Ambrosia trifida*), caesar weed (*Urena lobata*), hairy beggar-ticks (*Bidens alba*), smutgrass (*Sporobolus sp.*), false buttonweed (*Spermacoce verticillata*), three-awn grass (*Aristida purpurea*), flattop goldenrod *(Euthamia caroliniana),* and other various opportunistic weedy species. Commonly observed vines include greenbriar (*Smilax sp.)*, and grapevine (*Vitis rotundifolia)*. This community would be considered uplands by the regulatory agencies.

FLUCFCS 427 E3 Live Oak (50-74% Exotics) – 1.25± Acres

This upland habitat type occupies approximately 1.25± acres of the property. The canopy consists of live oak (*Quercus virginiana*). The sub-canopy contains cabbage palm (*Sabal palmetto*) and Brazilian pepper (*Schinus terebinthifolius*) occupy approximately 50-74% of this community. The ground cover is mostly open with scattered Spanish needle (*Bidens alba*), false buttonweed (*Spermacoce floridan*), caesar weed (*Urena lobata*), ragweed (*Ambrosia artemisiifolia*), broomsedge (*Andropogon virginicus*), and bahia grass (*Paspalum notatum*), with various other opportunistic weedy species. Commonly observed vines include grapevine *(Vitis munsoniana)* and greenbriar *(Smilax* spp.). This community would be considered uplands by the regulatory agencies.

FLUCFCS 743 B Berm – 3.88± Acres

This upland community type is a spoil pile comprised of fill material and occupies approximately 3.88± acres of the property. The canopy and sub-canopy is mostly open with widely scattered slash pine *(Pinus elliottii),* live oak (*Quercus virginiana*), and Brazilian pepper (*Schinus terebinthifolius*). The ground cover is dominated by saw palmetto (*Serenoa repens*), with broomsedge (*Andropogon virginicus*), Spanish needle (*Bidens pilosa*), dog fennel (*Eupatorium capillifolium*), ragweed (*Ambrosia trifida*), and caesar weed (*Urena lobata*), with other various opportunistic weedy species. Commonly observed vines include greenbriar (*Smilax sp.)*, and grapevine (*Vitis rotundifolia)*. This community would be considered uplands by the regulatory agencies.

FLUCFCS 743 S Spoil – 9.38± Acres

This upland habitat type occupies 9.38± acres of the property. The canopy contains slash pine *(Pinus elliottii),* live oak (*Quercus virginiana*), and melaleuca *(Melaleuca quinquenervia).* The sub-canopy contains cabbage palm (*Sabal palmetto*) and Brazilian pepper (*Schinus terebinthifolius*). The ground cover is dominated by bahia grass (*Paspalum notatum*) with ragweed (*Ambrosia artemisiifolia*) dog fennel (*Eupatorium capillifolium*), and other

opportunistic weedy species. Commonly observed vines include grapevine *(Vitis munsoniana)* and greenbriar *(Smilax* spp.). This community would be considered uplands by the regulatory agencies.

Wetlands
The following community areas have been designated as wetland habitats. Wetlands are any areas that under normal circumstances have hydrophytic vegetation, hydric soils, and wetland hydrology.

FLUCFCS 619 E4 Exotic Wetland Hardwoods (>75% Exotics) – 6.65± Acres

This wetland community type occupies approximately 6.65± acres of the property. The canopy is dominated by melaleuca (*Melaleuca quinquenervia*) occupying approximately 75-99% of this community. The sub-canopy contains Brazilian pepper (*Schinus terebinthifolius*), cabbage palm (*Sabal palmetto*), wax myrtle *(Myrica cerifera),* myrsine (*Myrsine guianesis*), saltbush (*Baccharis halimifolia*), Carolina willow (*Salix caroliniana*), and primrose willow (*Ludwigia peruviana*). The ground cover contains yellow-eyed grass (*Xyris* floridana), nutsedge (*Cyperus sp.*), rosy camphorweed (*Pluchea rosea*), dollar weed (*Hydrocotyle umbellata*), little blue maidencane (*Amphicarpum muhlenbegianum*), frog fruit (*Phyla nodiflora*), false buttonweed *(Spermacoce verticillata),* torpedo grass *(Panicum repens),* tickseed (*Coreopsis floridana*), cat-tail (*Typha latifolia*), maidencane (*Panicum hemitomon*), cogon grass (*Imperata cylindrica*), and white-top sedge (*Rhynchospora colorata*), with other various grasses and sedges. This community does contain wetland vegetation, water line staining, and algal matting, as well as other signs in this community that would be classified as wetlands. This community would be considered wetlands by the regulatory agencies.

FLUCFCS 621 E2 Cypress Wetland (25-49% Exotics) – 3.34± Acres

This wetland community type occupies approximately 3.34± acres of the property. The canopy is dominated by bald cypress *(Taxodium distichum),* laurel oak *(Quercus laurifolia),* with melaleuca *(Melaleuca quinquenervia)* occupying approximately 25-49% of this community. The sub-canopy vegetation includes Brazilian pepper *(Schinus terebinthifolius)*, buttonbush *(Cephalanthus occidentalis),* climbing cassia (*Senna pendula*), and dahoon holy *(Ilex cassine).* The ground cover is dominated by swamp fern *(Blechnum serrulatum),* swamp lily (*Crinum americanum*), and royal fern (*Osmunda regalis).* Commonly observed vines include greenbriar *(Smilax* spp.) and Japanese climbing fern *(Lygodium japonicum).* This community does contain some transitional wetland vegetation, advantageous rooting, water line staining, and algal matting, as well as other signs in this community that would be classified as wetlands. This community would be considered wetlands by the regulatory agencies.

FLUCFCS 621 E3 Cypress Wetland (50-74% Exotics) – 19.73± Acres

This wetland community type occupies approximately 19.73± acres of the property. The canopy contains bald cypress *(Taxodium distichum),* laurel oak *(Quercus laurifolia),* with melaleuca *(Melaleuca quinquenervia)* occupying approximately 50-74% of this community. The sub-canopy vegetation includes Brazilian pepper *(Schinus terebinthifolius*), buttonbush (*Cephalanthus occidentalis*), climbing cassia (*Senna pendula*), and dahoon holy (*Ilex cassine*). The ground cover is dominated by swamp fern *(Blechnum serrulatum),* swamp lily (*Crinum americanum*), and royal fern (*Osmunda regalis).* Commonly observed vines include greenbriar *(Smilax* spp.) and Japanese climbing fern *(Lygodium japonicum).* This community does contain some transitional wetland vegetation, advantageous rooting, water line staining, and algal matting, as well as other signs in this community that would be classified as wetlands. This community would be considered wetlands by the regulatory agencies.

FLUCFCS 624 E2 Cypress – Pine – Cabbage Palm (25-49% Exotics) – 5.38± Acres

This wetland community type occupies approximately 5.38± acres of the property. The canopy contains bald cypress *(Taxodium distichum),* and slash pine *(Pinus elliottii*), and melaleuca (*Melaleuca quinquenervia*) occupying

approximately 25-49% of this community. The sub-canopy contains cabbage palm (*Sabal palmetto*), Brazilian pepper *(Schinus terebinthifolius)*, myrsine *(Rapanea punctata),* wax myrtle *(Myrica cerifera),* primrose willow *(Ludwigia peruviana),* saltbush (*Baccharis halimifolia),* buckthorn (*Sideroxylon celastrinum*), climbing cassia (*Senna pendula*), and buttonbush *(Cephalanthus occidentalis).* The ground cover vegetation includes swamp fern *(Blechnum serrulatum),* yellow-eyed grass (*Xyris floridana*), rosy camphorweed (*Pluchea rosea*), dollarweed (*Hydrocotyle umbellata*), torpedo grass (*Panicum repens*), St. Johns wort (*Hypericum perforatum*), mermaid weed (*Proserpinaca palustris*), water hyssop (*Bacopa monnieri*), and flatsedge *(Cyperus ligularis*). Commonly observed vines include Japanese climbing fern *(Lygodium japonicum),* climbing hempvine (*Mikania scandens*), and greenbriar *(Smilax* spp.). This community does contain some transitional wetland vegetation, advantageous rooting, water line staining, and algal matting, as well as other signs in this community that would be classified as wetlands. This community would be considered wetlands by the regulatory agencies.

FLUCFCS 624 E3 Cypress – Pine – Cabbage Palm (50-74% Exotics) – 5.40± Acres

This wetland community type occupies approximately 5.40± acres of the property. The canopy contains bald cypress *(Taxodium distichum),* and slash pine *(Pinus elliottii*), with melaleuca (*Melaleuca quinquenervia*) occupying approximately 50-74% of this community. The sub-canopy contains cabbage palm (*Sabal palmetto*), Brazilian pepper *(Schinus terebinthifolius)*, myrsine *(Rapanea punctata),* wax myrtle *(Myrica cerifera),* primrose willow *(Ludwigia peruviana),* saltbush (*Baccharis halimifolia),* buckthorn (*Sideroxylon celastrinum*), climbing cassia (*Senna pendula*), and buttonbush *(Cephalanthus occidentalis).* The ground cover vegetation includes swamp fern *(Blechnum serrulatum),* yellow-eyed grass (*Xyris floridana*), rosy camphorweed (*Pluchea rosea*), dollarweed (*Hydrocotyle umbellata*), torpedo grass (*Panicum repens*), St. Johns wort (*Hypericum perforatum*), mermaid weed (*Proserpinaca palustris*), water hyssop (*Bacopa monnieri*), and flatsedge *(Cyperus ligularis*). Commonly observed vines include Japanese climbing fern *(Lygodium japonicum),* climbing hempvine (*Mikania scandens*), and greenbriar *(Smilax* spp.). This community does contain some transitional wetland vegetation, advantageous rooting, water line staining, and algal matting, as well as other signs in this community that would be classified as wetlands. This community would be considered wetlands by the regulatory agencies.

FLUCFCS 630 E3 Mixed Wetland Forest (50-74% Exotics) – 1.07± Acres

This wetland community type occupies approximately 1.07± acres of the property. The canopy contains slash pine (*Pinus elliottii*), laurel oak (*Quercus laurifolia*), and melaleuca (*Melaleuca quinquenervia*) occupying approximately 50-74% of this community, with widely scattered bald cypress *(Taxodium distichum).* The sub-canopy contains cabbage palm (*Sabal palmetto*), with scattered Brazilian pepper (*Schinus terebinthifolius*), myrsine (*Rapanea punctata*), climbing cassia (*Senna pendula*), wax myrtle (*Myrica cerifera*), and saltbush (*Baccharis halimifolia).* The ground cover vegetation includes swamp fern *(Blechnum serrulatum),* black needlerush *(Juncus roemerianus),* beakrush *(Cyperus sp.),* yellow-eyed grass (*Xyris floridana*), sawgrass (*Cladium jamaicense*), leather fern (*Acrostichum daneifolium*), rosy camphorweed (*Pluchea rosea*), cocoa plum *(Chrysobalanus icaco),* dollarweed (*Hydrocotyle umbellata*), and flatsedge *(Cyperus ligularis).* Commonly observed vines include grapevine (*Vitis rotundifolia*), Virginia creeper (*Parthenocissus quinquefolia*), peppervine (*Ampelopsis arborea*), and greenbriar (*Smilax spp.*). This community does contain some transitional wetland vegetation, advantageous rooting, water line staining, and algal matting, as well as other signs in this community that would be classified as wetlands. This community would be considered wetlands by the regulatory agencies.

FLUCFCS 641 E2 Freshwater Marsh (25-49% Exotics) – 14.75± Acres

This wetland area occupies approximately 14.75± acres of the property. The canopy is mostly open with scattered Carolina willow (*Salix caroliniana*), and melaleuca *(Melaleuca quinquenervia*) occupying approximately 25-49% of this community. The sub-canopy contains primrose willow (*Ludwigia peruviana*), with saltbush (*Baccharis*

halimifolia), wax myrtle *(Myrica cerifera),* and Brazilian pepper (*Schinus terebinthifolius*) along the edges. The ground cover includes torpedo grass (*Panicum repens*), swamp fern *(Blechnum serrulatum)*, fire flag *(Thalia geniculata),* yellow-eyed grass (*Xyris* floridana), rosy camphorweed (*Pluchea rosea*), sand cordgrass (*Spartina sp.*), mermaid-weed (*Proserpinaca palustris*), asiatic pennywort (*Centella asiatica*), dollar weed (*Hydrocotyle umbellata),* frog fruit (*Phyla nodiflora*), maidencane (*Panicum hemitomon*), mock bishop's weed (*Ptilimnium capillaceum*), and white-top sedge (*Rhynchospora colorata*), with other various grasses and sedges. This community does contain some transitional wetland vegetation, advantageous rooting, water line staining, and algal matting, as well as other signs in this community that would be classified as wetlands. This community would be considered wetlands by the regulatory agencies.

FLUCFCS 641 E3 Freshwater Marsh (50-74% Exotics) – 6.31± Acres

This wetland area occupies approximately 6.31± acres of the property. The canopy is mostly open with scattered Carolina willow (*Salix caroliniana*), and melaleuca *(Melaleuca quinquenervia*) occupying approximately 50-74% of this community. The sub-canopy contains primrose willow (*Ludwigia peruviana*), with saltbush (*Baccharis halimifolia*), wax myrtle *(Myrica cerifera),* and Brazilian pepper (*Schinus terebinthifolius*) along the edges. The ground cover includes torpedo grass (*Panicum repens*), swamp fern *(Blechnum serrulatum)*, fire flag *(Thalia geniculata),* yellow-eyed grass (*Xyris* floridana), rosy camphorweed (*Pluchea rosea*), sand cordgrass (*Spartina sp.*), mermaid-weed (*Proserpinaca palustris*), asiatic pennywort (*Centella asiatica*), dollar weed (*Hydrocotyle umbellata),* frog fruit (*Phyla nodiflora*), maidencane (*Panicum hemitomon*), mock bishop's weed (*Ptilimnium capillaceum*), and white-top sedge (*Rhynchospora colorata*), with other various grasses and sedges. This community does contain some transitional wetland vegetation, advantageous rooting, water line staining, and algal matting, as well as other signs in this community that would be classified as wetlands. This community would be considered wetlands by the regulatory agencies.

FLUCFCS 643 E3 Wet Prairie (50-74% Exotics) – 11.63± Acres

This wetland habitat occupies approximately 11.63± acres of the property. The canopy is mostly absent with scattered melaleuca *(Melaleuca quinquenervia*) occupying approximately 50-74% of this community, with bald cypress *(Taxodium distichum)*, and slash pine *(Pinus elliottii).* The sub-canopy contains scattered cabbage palm (*Sabal Palmetto*), wax myrtle *(Myrica cerifera),* Carolina willow (*Salix caroliniana*), primrose willow (*Ludwigia peruviana*), myrsine *(Rapanea punctata),* and Brazilian pepper *(Schinus terebinthifolius)* along the perimeter of the wetland. The ground cover includes asiatic pennywort (*Centella asiatica*), spikerush (*Eleocharis interstincta*), smart weed (*Polygonum hydropiperoides*), yellow-eyed grass (*Xyris floridana*), pickerel weed (*Pontederia cordata*), arrowhead (*Sagittaria latifolia*), torpedo grass (*Panicum repens*), white-top sedge (*Rhynchospora colorata*), maidencane (*Panicum hemitomon*), corkwood (*Leitneria floridana*), mermaid weed (*Proserpinaca pectinata*), and water hyssop (*Bacopa monnieri*). Commonly observed vines include climbing hempvine (*Mikania scandens*). This community does contain wetland vegetation, advantageous rooting, water line staining, and algal matting, as well as other signs in this community that would be classified as wetlands. This community would be considered wetlands by the regulatory agencies.

FLUCFCS 740H Disturbed Lands (Hydric) – 4.41± Acres

This disturbed wetland habitat type occupies approximately 4.41± acres of the property. Exotic species such as melaleuca *(Melaleuca quinquenervia)*, primrose willow (*Ludwigia peruviana*), and torpedo grass (*Panicum repens*), occupy a good portion of this community. The canopy and sub-canopy is mostly open with scattered Brazilian pepper (*Schinus terebinthifolius*) and melaleuca *(Melaleuca quinquenervia)* saplings, with primrose willow (*Ludwigia peruviana*), and wax myrtle *(Myrica cerifera).* The ground cover includes torpedo grass (*Panicum repens*), yellow-eyed grass (*Xyris* floridana), rosy camphorweed (*Pluchea rosea*), sand cordgrass (*Spartina sp.*),

dog fennel (*Eupatorium capillifolium*), little blue maidencane (*Amphicarpum muhlenbegianum*), tickseed (*Coreopsis floridana*), asiatic pennywort (*Centella asiatica*), dollar weed (*Hydrocotyle umbellata),* frog fruit (*Phyla nodiflora*), maidencane (*Panicum hemitomon*), mock bishop's weed (*Ptilimnium capillaceum*), white-top sedge (*Rhynchospora colorata*), and cogon grass (*Imperata cylindrica*), with other various grasses and sedges.

Other Surface Waters (OSW)
The following community area has been designated as other surface waters. Surface waters are waters on the surface of the earth, contained in bounds created naturally or artificially.

FLUCFCS 500 Cow Pond – 0.08± Acres

This "other surface water" (OSW) community occupies approximately 0.08± acres of the property and consists of shallow cow ponds. The canopy and sub-canopy are open. The ground cover includes asiatic pennywort (*Centella asiatica*), spikerush (*Eleocharis interstincta*), smart weed (*Polygonum hydropiperoides*), water hyacinth *(Eichhornia crassipes),* torpedo grass (*Panicum repens*), maidencane (*Panicum hemitomon*), mermaid weed (*Proserpinaca pectinata*), and water hyssop (*Bacopa monnieri*). This community would be considered "other surface waters" by the regulatory agencies.

FLUCFCS 510 Ditch – 8.54± Acres

This habitat type occupies approximately 8.54± acres of the property. The canopy is mostly open with scattered Carolina willow (*Salix caroliniana*) along the edges. is open. The sub-canopy contains scattered Brazilian pepper (*Schinus terebinthifolius*), wax myrtle (*Myrica cerifera*), and saltbush (*Baccharis halimifolia*) along the edges. The ground cover contains cattail (*Typha latifolia*), giant leather fern (*Acrostichum daneifolium*), maidencane (*Panicum hemitomon*), water hyacinth *(Eichhornia crassipes),* torpedo grass *(Panicum repens),* and spikerush *(Eleocharis spp.).* This community was artificially created and would be considered other surface waters by the regulatory agencies.

Table 1. FLUCFCS Community Table

FLUCFCS Code	Community Description	Habitat Type	Acres
211	Improved Pasture	Upland	79.50± Ac.
213	Woodland Pasture	Upland	5.22± Ac.
427 E3	Live Oak (50-74% Exotics)	Upland	1.25± Ac.
500	Cow Pond	OSW	0.08± Ac.
510	Ditch	OSW	8.54± Ac.
619 E4	Exotic Wetland Hardwoods (>75% Exotics)	Wetland	6.65± Ac.
621 E2	Cypress Wetlands (25-49% Exotics)	Wetland	3.34± Ac.
621 E3	Cypress Wetlands (50-74% Exotics)	Wetland	19.73± Ac.
624 E2	Cypress – Pine – Cabbage Palm (25-49% Exotics)	Wetland	5.38± Ac.
624 E3	Cypress – Pine – Cabbage Palm (50-74% Exotics)	Wetland	5.40± Ac.
630 E3	Wetland Forested Mixed (50-74% Exotics)	Wetland	1.07± Ac.
641 E2	Freshwater Marsh (25-49% Exotics)	Wetland	14.75± Ac.
641 E3	Freshwater Marsh (50-74% Exotics)	Wetland	6.31± Ac.
643 E3	Wet Prairie (50-74% Exotics)	Wetland	11.63± Ac.
740H	Disturbed Lands (Hydric)	Wetland	4.41± Ac.
743B	Berm	Upland	3.88± Ac.
743S	Spoil	Upland	9.38± Ac.
Total			**186.52± Ac.**

Species Survey Results

There have been numerous prior environmental assessments and species surveys conducted on-site; the most recent survey was this one, conducted February 10, 2026. During the field survey for protected species on the property, there were no protected species or signs thereof observed. There were no gopher tortoise (*Gopherus polyphemus*) and/or burrowing owl (*Athene cunicularia floridana*) burrows identified. There were several other burrows, believed to belong to that of the eastern nine-banded armadillo (*Dasypus novemcinctus*), that were identified; there was no evidence that these burrows were being used by gopher tortoises. There were no other protected species or signs thereof observed; there were no nest-like structures or tree cavities noted while conducting the protected species survey on-site.

There were several non-listed species identified while conducting the protected species survey, among those were pine warbler (*Setophaga pinus*), Eastern cottontail rabbit (*Sylvilagus floridanus*), black vulture (*Coragyps atratus*), blue jay (*Cyanocitta cristata*), red-shouldered hawk (*Buteo lineatus*), and grey squirrel (*Sciurus carolinesis*). The various listed species that may occur in the FLUCFCS communities on-site have been tabulated on the attached table. Please see the attached Protected Species Survey Map (Exhibit E).

Mitigation Discussion

Generally, the ACOE and/or DEP does not regulate isolated wetlands or excavation in wetlands where there is only incidental fall back of fill material; the ACOE or DEP do not have jurisdiction over isolated wetlands. In making the determination on whether the wetlands are isolated, the ACOE and DEP considers if water leaves the site, (i.e. ditches) or whether the wetlands are completely contained on-site or extend off-site. If the wetlands extend off-site, they will more than likely assert jurisdiction. Currently, the ACOE and DEP position on most all wetlands is that one of them has jurisdiction; the ACOE regulates navigable waters whereas the DEP regulates both navigable waters and adjacent wetlands. However, the agencies would not make this determination until a Joint Environmental Resource Permit (ERP) and Dredge & Fill Permit (D&F) application is received.

The SFWMD does not require mitigation for impacts to isolated wetlands not used by listed (protected) species that are less than 0.50± acres in size. Impacts to wetlands greater than 0.50± acres or those utilized by protected species would require mitigation. With the ACOE and DEP, impacts to wetlands that are less than 0.50± acres, the activity can usually be processed as a Nationwide Permit application. For projects with greater than 0.50± acres of impacts, the application will be processed as an Individual Permit application. This involves a public notice process and coordination with other federal agencies such as the EPA and the FWS.

There are three steps that are required to be addressed when requesting an ERP permit with the SFWMD and/or the DEP for impacts to regulated wetlands:

1) Avoidance (i.e. can these wetland impacts be completely avoided)
2) Minimization (i.e. can the amount of wetland impact be reduced while maintaining a feasible project)
3) Mitigation (i.e. the loss of wetland function must be replaced)

It should be noted that avoidance and minimization must first be substantiated, before mitigation will be considered by the agencies. When wetlands are proposed to be impacted, the impacts cannot result in any loss of wetland function. In order to prevent net loss in wetland function, wetland mitigation must be provided. Mitigation is a way to off-set impacts to natural resources such as wetlands and may consist of wetland enhancement, wetland creation, wetland preservation, upland compensation, or off-site mitigation. Mitigation costs usually increase with

the quantity of proposed impacts. The actual amount of mitigation required would be finalized during the Environmental Resource Permit review process with the SFWMD, ACOE, and DEP.

There are two main categories of wetland mitigation, on-site or off-site. On-site mitigation would include preserving a portion of the on-site wetlands, treating and removing the exotics, potentially providing supplemental plantings, and placing the preserve areas under a Conservation Easement. Preserve areas are required to be maintained in perpetuity. Off-site mitigation requires the purchase of wetland credits at an approved mitigation bank within the service area of the site.

Summary & Discussion

Due to the disturbed nature of the site, the surrounding land uses, and busy roadways, it is unlikely that this site supports or would provide habitat for protected species. A formal protected species survey would be required prior to issuance of a Development Order to confirm the presence or absence of protected species. Community locations were drawn using non-rectified aerial images; hence their location, aerial extent, and acreage are approximate.

The determination of ecological system classifications, functions, values, and boundaries is an inexact science, and different individuals and agencies may reach different conclusions. The on-site conditions can vary throughout the year; therefore, the findings of this survey were based upon the site conditions at the time of the inspection. It is not possible for BearPaws Environmental Consulting to guarantee the outcome of such determinations; therefore, the conclusions of this report are preliminary in nature and would require a full review by the appropriate regulatory agencies.

The information contained and the work performed as part of this initial assessment conforms to the standards and generally accepted practices in the environmental field, and was prepared substantially in accordance with then-current technical guidelines and criteria. The conclusions of this report represent the results of our analysis of the information provided by the client and their consultants, together with information gathered in the course of the study. No other guarantee, expressed or implied, is made.

Table 2: Listed Species by Habitat with Current Status

FLUCFCS Code	FLUCFCS Description	Common Name	Scientific Name	Observed	USDA	FDA&CS	FWS	FWC
211	Improved Pasture	Florida Sandhill crane	*Grus canadensis pratensis*	--	--	--	--	T
213	Wooded Pasture	Florida sandhill crane	*Grus canadensis pratensis*	--	--	--	--	T
427	Live Oak	Eastern indigo snake	*Drymarchon corais couperi*	--	--	--	--	T
		Florida panther	*Felis concolor coryi*	--	--	--	--	E
		Gopher tortoise	*Gopherus polyphemus*	--	--	--	--	T
		Hand adder's tongue fern	*Ophioglossum palmatum*	--	--	--	E	--
		Simpson's stopper	*Myrcianthes fragrans var. simpsonii*	--	--	--	T	--
500	Other Surface Water	American alligator	*Alligator mississipiensis*	--	--	--	SAT	SSC
		Everglades mink	*Mustela vison evergladensis*	--	--	--	--	E
		Little blue heron	*Egretta caerulea*	--	--	--	--	T
		Reddish egret	*Egretta rufescens*	--	--	--	--	T
		Roseate spoonbill	*Ajaia ajaja*	--	--	--	--	T
		Snowy egret	*Egretta thula*	--	--	--	--	T
		Tricolored heron	*Egretta tricolor*	--	--	--	--	T
619	Mixed Wetland Hardwoods	Little blue heron	*Egretta caerulea*	--	--	--	--	T
		Snowy egret	*Egretta thula*	--	--	--	--	T
		Tricolored heron	*Egretta tricolor*	--	--	--	--	T
621	Cypress	American alligator	*Alligator mississipiensis*	--	--	--	SAT	T
		Little blue heron	*Egretta caerulea*	--	--	--	--	T
		Snowy egret	*Egretta thula*	--	--	--	--	T
		Tricolored heron	*Egretta tricolor*	--	--	--	--	T
		Wood stork	*Mycteria americana*	--	--	--	E	E
624	Cypress – Pine – Cabbage Palm	Little blue heron	*Egretta caerulea*	--	--	--	--	T
		Snowy egret	*Egretta thula*	--	--	--	--	T
		Tricolored heron	*Egretta tricolor*	--	--	--	--	T
630	Wetland Forested Mixed	Everglades mink	*Mustela vison evergladensis*	--	--	--	--	E
		Gopher frog	*Rana areolata*	--	--	--	--	T
		Little blue heron	*Egretta caerulea*	--	--	--	--	T
		Snowy egret	*Egretta thula*	--	--	--	--	T
		Tricolored heron	*Egretta tricolor*	--	--	--	--	T
		Wood stork	*Mycteria americana*	--	--	--	E	E

C = Commercially Exploited, SAT = Similarity of Appearance Threatened, SSC = Species of Special Concern, T = Threatened, E = Endangered

Table designates listed species with potential to occur in each FLUCFCS community.

Table 2 (Continued): Listed Species by Habitat with Current Status

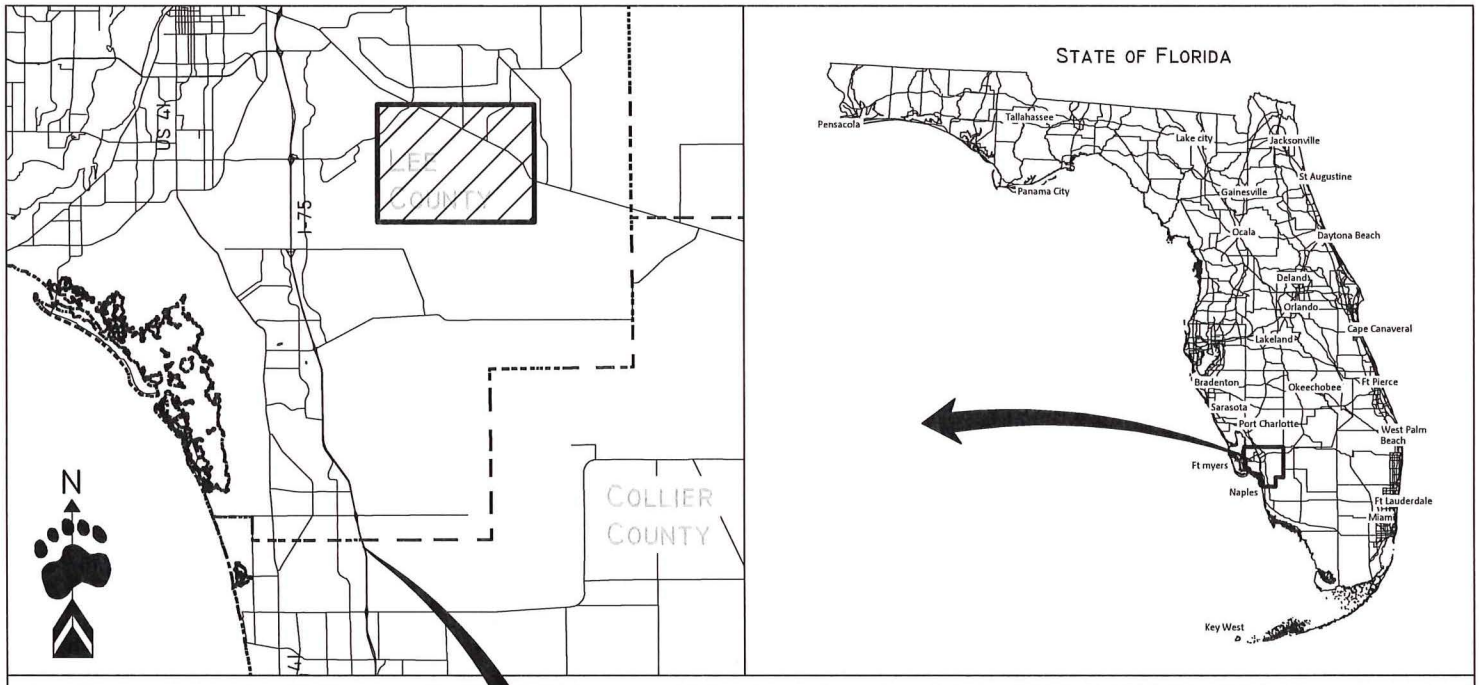
FLUCFCS Code	FLUCFCS Description	Common Name	*Scientific Name*	Observed	USDA	FDA&CS	FWS	FWC
641	Freshwater Marsh	American alligator	*Alligator mississipiensis*	--	--	--	SAT	SSC
		Everglades mink	*Mustela vison evergladensis*	--	--	--	--	E
		Florida sandhill crane	*Grus canadensis pratensis*	--	--	--	--	T
		Little blue heron	*Egretta caerulea*	--	--	--	--	T
		Snail kite	*Rostrhamus sociabilis*	--	--	--	E	E
		Snowy egret	*Egretta thula*	--	--	--	--	T
		Tricolored heron	*Egretta tricolor*	--	--	--	--	T
643	Wet Prairie	American alligator	*Alligator mississipiensis*	--	--	--	SAT	SSC
		Everglades mink	*Mustela vison evergladensis*	--	--	--	--	E
		Florida sandhill crane	*Grus canadensis pratensis*	--	--	--	--	T
		Little blue heron	*Egretta caerulea*	--	--	--	--	SSC
		Snail kite	*Rostrhamus sociabilis*	--	--	--	E	E
		Snowy egret	*Egretta thula*	--	--	--	--	T
		Tricolored heron	*Egretta tricolor*	--	--	--	--	T
740	Disturbed Lands	Gopher tortoise	*Gopherus polyphemus*	--	--	--	T	T
743	Berm/Spoil Area	Gopher tortoise	*Gopherus polyphemus*	--	--	--	T	T

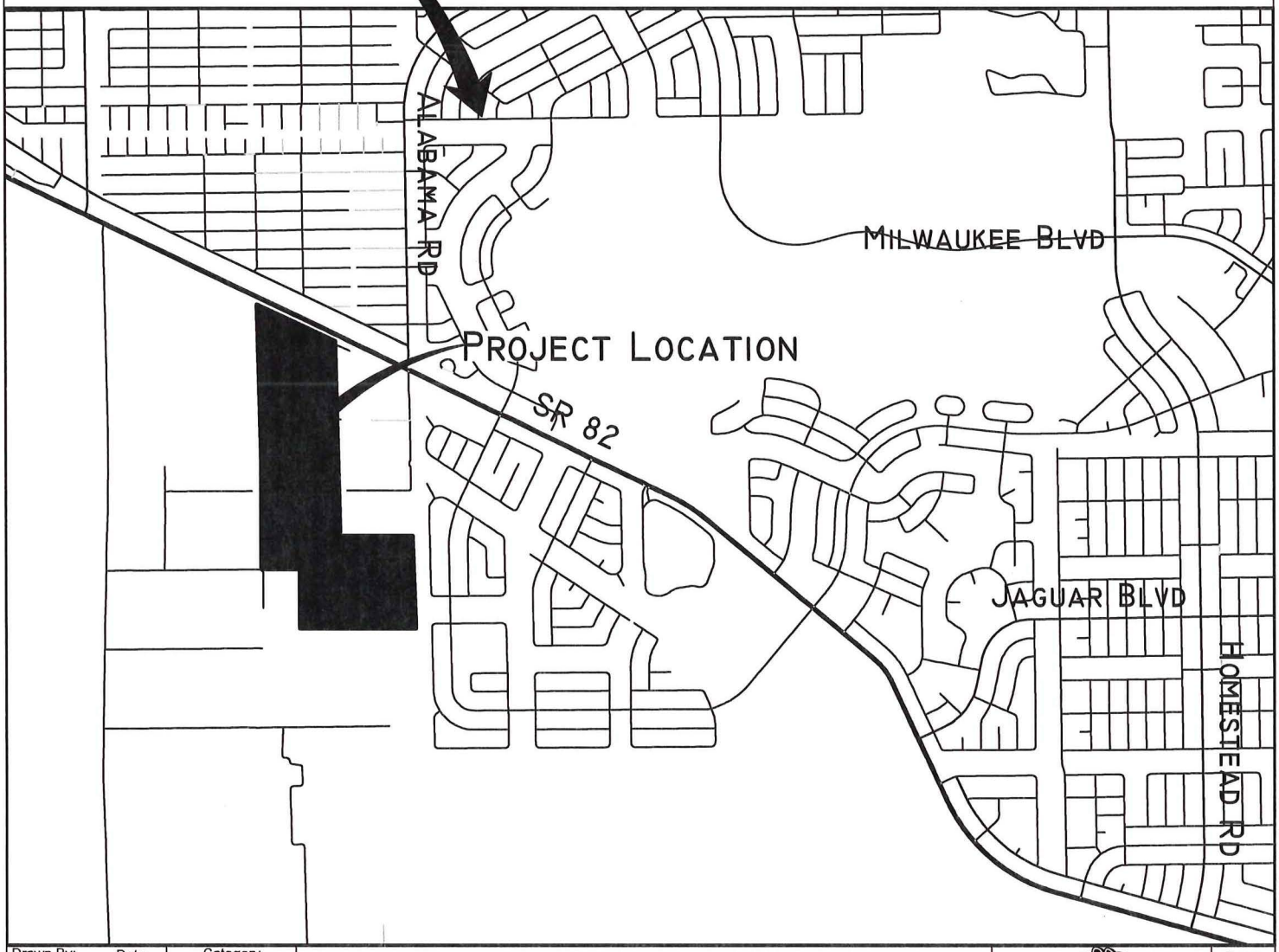
C = Commercially Exploited, SAT = Similarity of Appearance Threatened, SSC = Species of Special Concern, T = Threatened, E = Endangered

Table designates listed species with potential to occur in each FLUCFCS community.

EXHIBIT A

Project Location Map





Drawn By:	Date:	Category
BWS	2/10/26	Location
Job Number		Scale: NTS
S/T/R		County
13/45S/26E		Lee

Freeman SR 82 Property

Location Map

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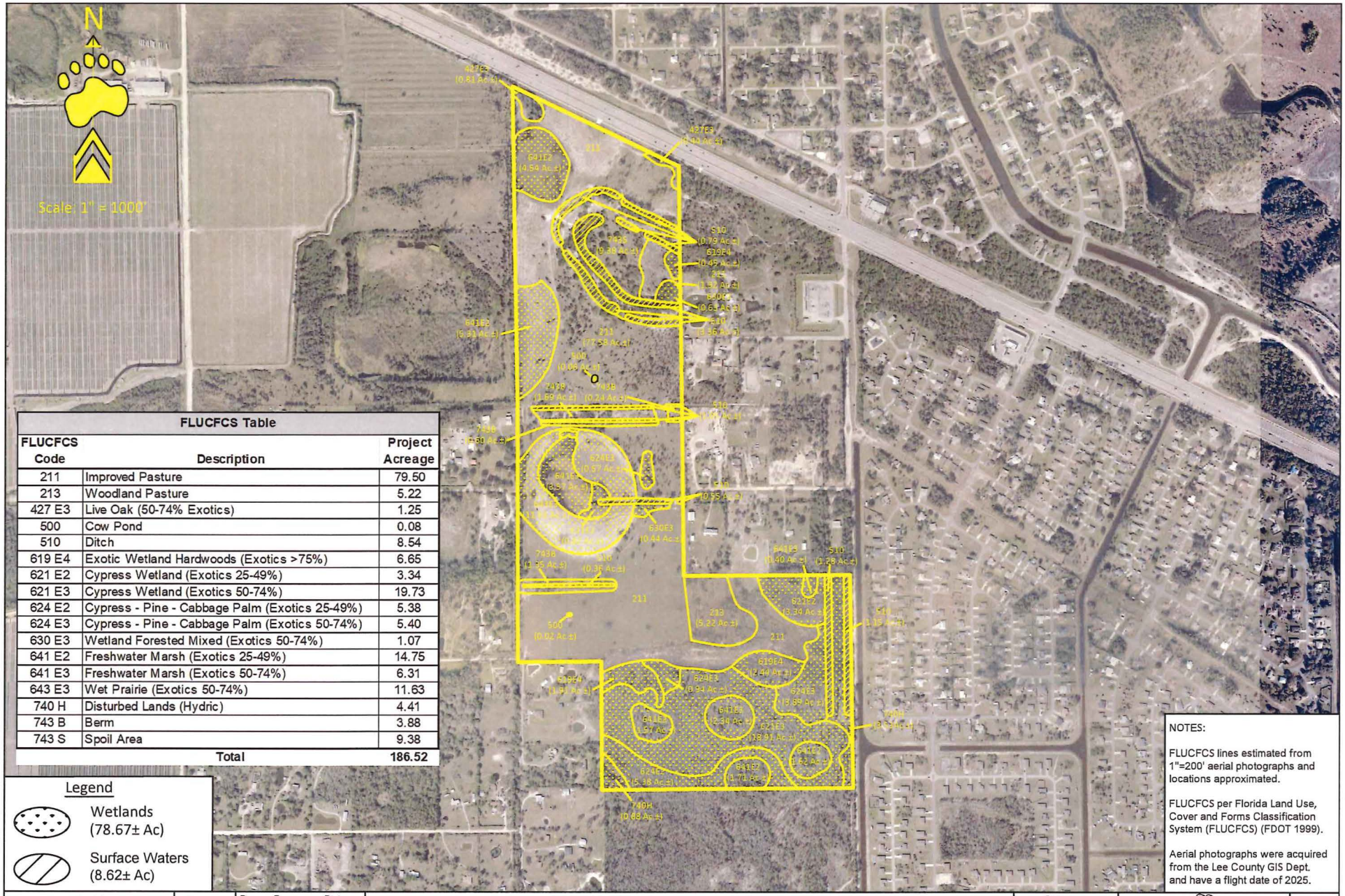
PAGE

EXHIBIT

EXHIBIT B

FLUCFCS Map with Aerial



FLUCFCS Table		
FLUCFCS Code	Description	Project Acreage
211	Improved Pasture	79.50
213	Woodland Pasture	5.22
427 E3	Live Oak (50-74% Exotics)	1.25
500	Cow Pond	0.08
510	Ditch	8.54
619 E4	Exotic Wetland Hardwoods (Exotics >75%)	6.65
621 E2	Cypress Wetland (Exotics 25-49%)	3.34
621 E3	Cypress Wetland (Exotics 50-74%)	19.73
624 E2	Cypress - Pine - Cabbage Palm (Exotics 25-49%)	5.38
624 E3	Cypress - Pine - Cabbage Palm (Exotics 50-74%)	5.40
630 E3	Wetland Forested Mixed (Exotics 50-74%)	1.07
641 E2	Freshwater Marsh (Exotics 25-49%)	14.75
641 E3	Freshwater Marsh (Exotics 50-74%)	6.31
643 E3	Wet Prairie (Exotics 50-74%)	11.63
740 H	Disturbed Lands (Hydric)	4.41
743 B	Berm	3.88
743 S	Spoil Area	9.38
	Total	186.52

Legend

Wetlands (78.67± Ac)

Surface Waters (8.62± Ac)

NOTES:

FLUCFCS lines estimated from 1"=200' aerial photographs and locations approximated.

FLUCFCS per Florida Land Use, Cover and Forms Classification System (FLUCFCS) (FDOT 1999).

Aerial photographs were acquired from the Lee County GIS Dept. and have a flight date of 2025.

Revisions	Date:

Drawn By: BWS Date: 2/10/26

Job Number

S/T/R 13/45S/26E

Freeman SR 82 Property

Aerial FLUCFCS Map

Category: FLUCFCS

Scale: 1" = 1000'

County: Lee

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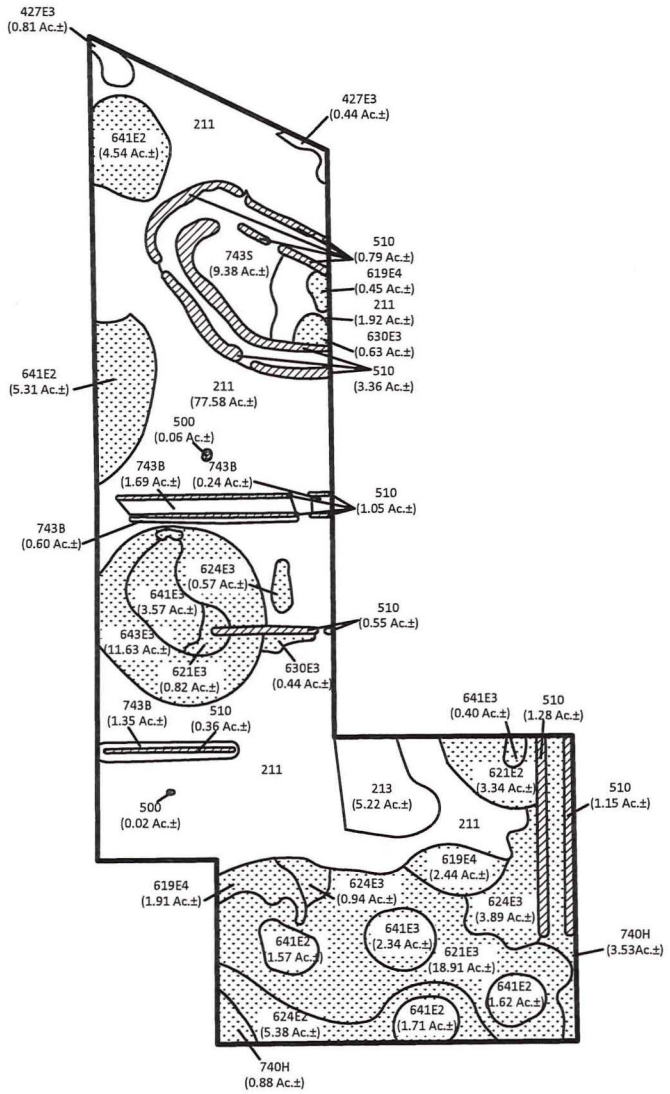
Exhibit -

EXHIBIT C

FLUCFCS Map

N

Scale: 1" = 1000'



FLUCFCS Table		
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	Total	186.52

Legend

Wetlands (78.67± Ac)

Surface Waters (8.62± Ac)

NOTES:

FLUCFCS lines estimated from 1"=200' aerial photographs and locations approximated.

FLUCFCS per Florida Land Use, Cover and Forms Classification System (FLUCFCS) (FDOT 1999).

Revisions	Date:	Drawn By:	Date:
		BWS	2/10/26
		Job Number	
		S/T/R	
		13/45S/26E	

Freeman SR 82 Property

FLUCFCS Map

Category	Page
FLUCFCS	-
Scale: 1" = 1000'	Exhibit
County: Lee	-

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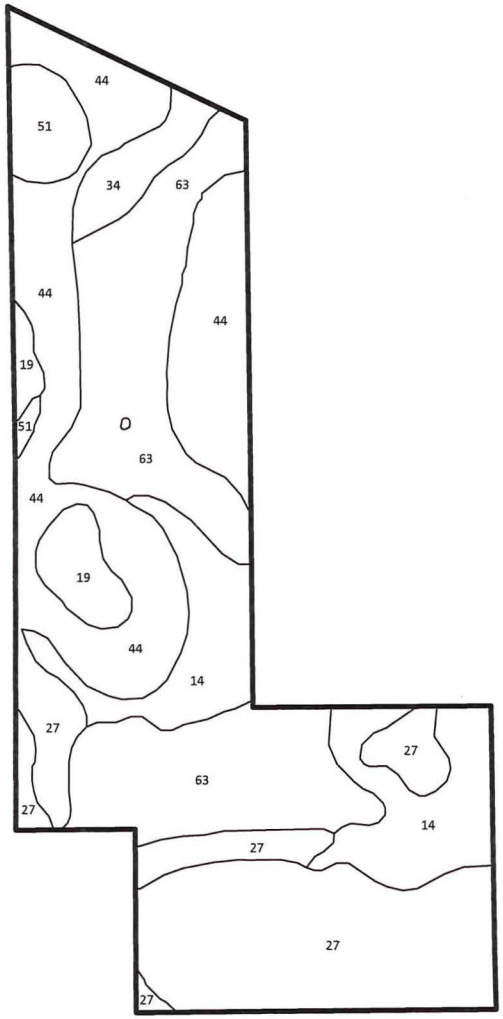
EXHIBIT D

NRCS Soils Map

N

Scale: 1" = 1000'



NRCS Soils Table		
Soils No.	Name	Hydric
10	Pompano Fine Sand, 0 To 2 Percent Slopes	Yes
11	Myakka Fine Sand, 0 To 2 Percent Slopes	No
14	Valkaria Fine Sand, 0 To 2 Percent Slopes	Yes
19	Gator Muck, Frequently Ponded, 0 To 1 Percent Slopes	Yes
27	Pompano Fine Sand, Frequently Ponded, 0 To 1 Percent Slopes	Yes
33	Oldsmar Sand, 0 To 2 Percent Slopes	No
34	Malabar Fine Sand, 0 To 2 Percent Slopes	Yes
44	Malabar Fine Sand, Frequently Ponded, 0 To 1 Percent Slopes	Yes
51	Floridana Sand, Frequently Ponded, 0 To 2 Percent Slopes	Yes
63	Malabar Fine Sand, High, 0 To 2 Percent Slopes	No

NOTES

Soils were acquired from LABINS and are from the NRCS.

Revisions	Date:	Drawn By:	Date:
		BWS	2/10/26
		Job Number	
		S/T/R	
		13/45S/26E	

Freeman SR 82 Property

Soils Map

Category	Page
Soils	-
Scale: 1" = 1000'	Exhibit
County: Lee	-

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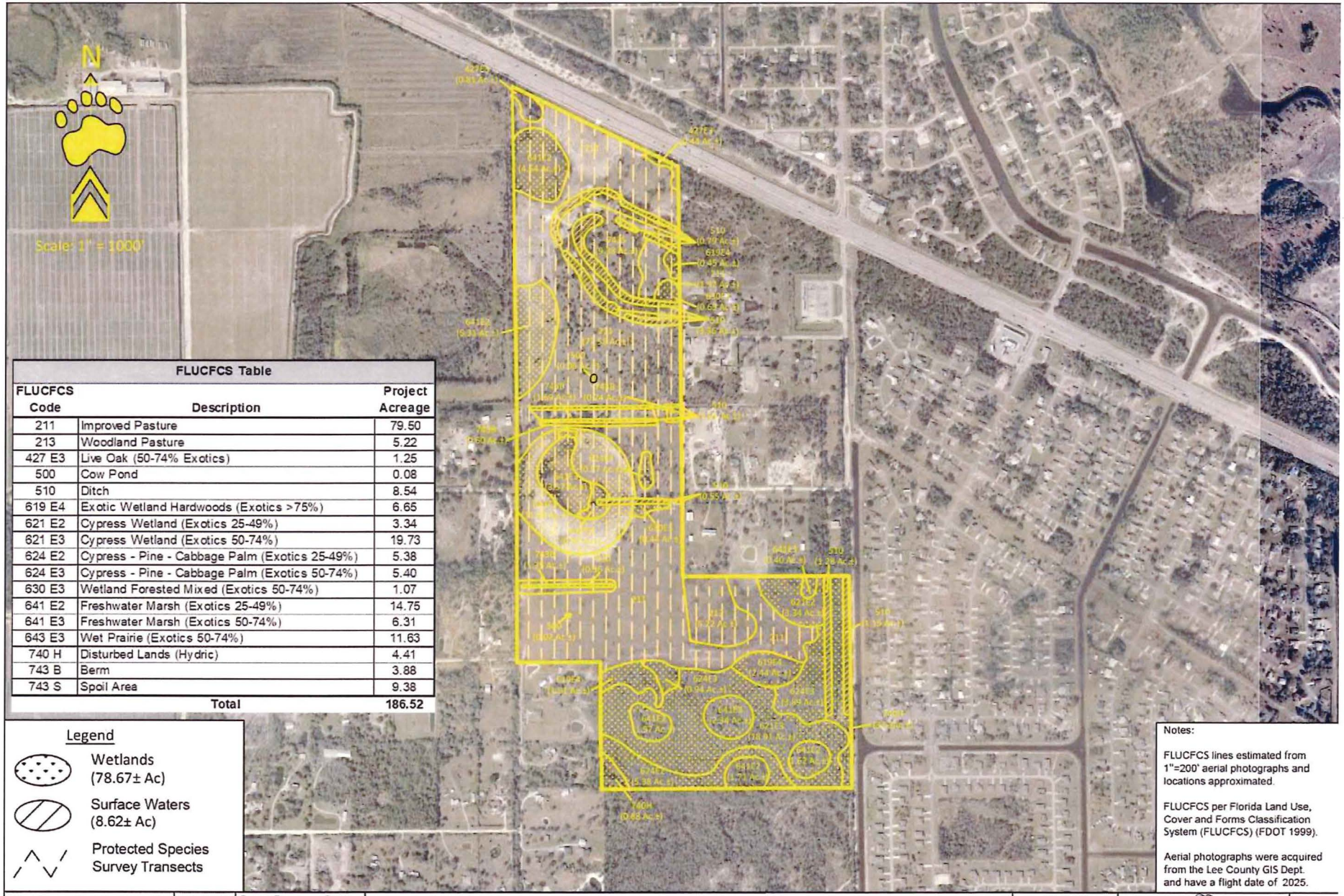
EXHIBIT E

Protected Species Survey Map



FLUCFCS Table		
FLUCFCS Code	Description	Project Acreage
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740 H	Disturbed Lands (Hydric)	4.41
743 B	Berm	3.88
743 S	Spoil Area	9.38
	Total	186.52

Legend

- Wetlands (78.67± Ac)
- Surface Waters (8.62± Ac)
- Protected Species Survey Transects

Notes:

FLUCFCS lines estimated from 1"=200' aerial photographs and locations approximated.

FLUCFCS per Florida Land Use, Cover and Forms Classification System (FLUCFCS) (FDOT 1999).

Aerial photographs were acquired from the Lee County GIS Dept. and have a flight date of 2025.

Revisions	Date:

Drawn By: BWS Date: 2/10/26

Job Number

S/T/R 13/45S/26E

Freeman SR 82 Property

Aerial PSS Map

Category: PSS

Scale: 1" = 1000'

County: Lee

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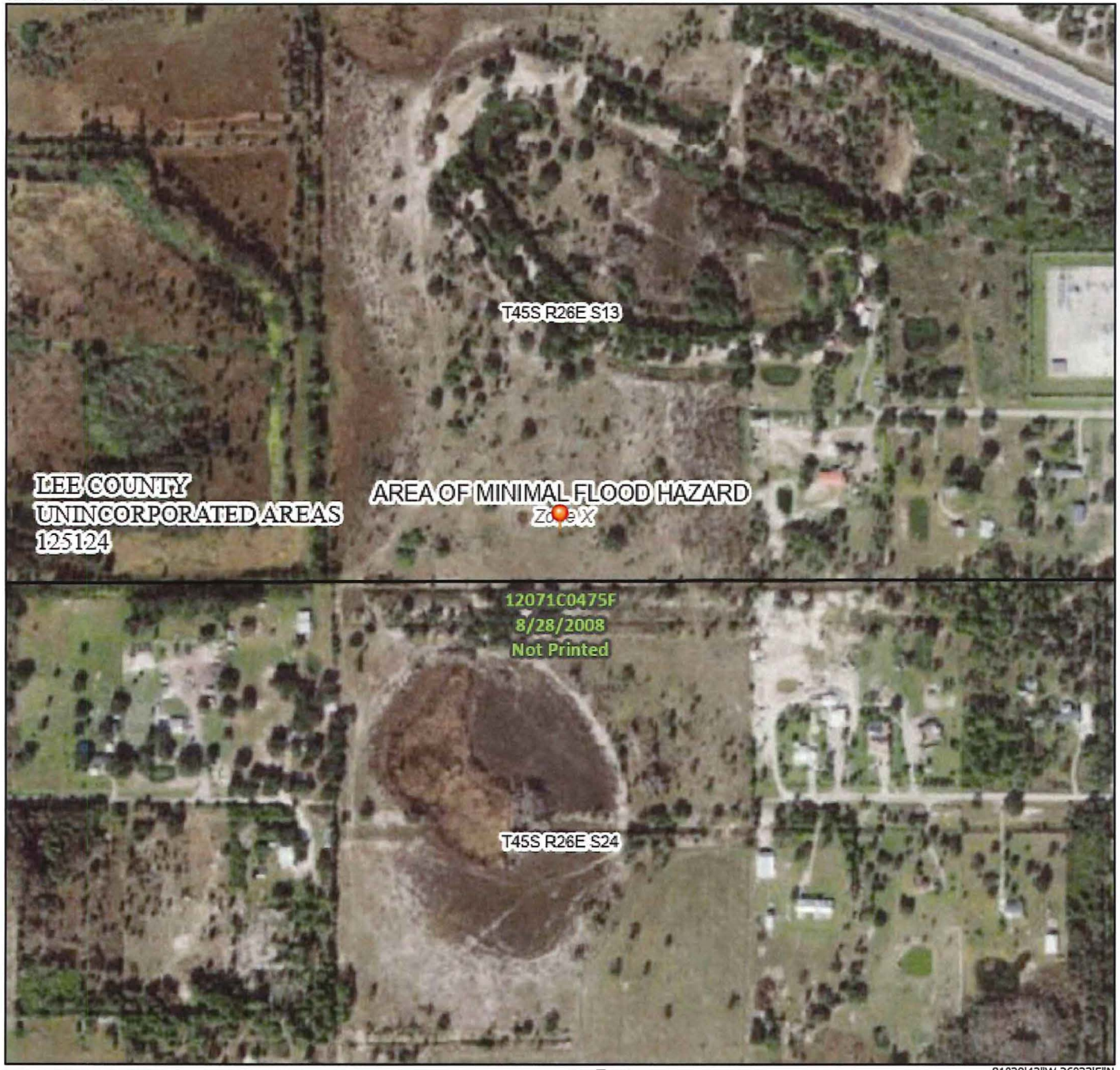
Exhibit -

National Flood Hazard Layer FIRMette

FEMA

81°40'21"W 26°33'37"N



0 250 500 1,000 1,500 2,000 Feet

1:6,000

81°39'43"W 26°33'5"N

Basemap Imagery Source: USGS National Map 2023

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS
- Without Base Flood Elevation (BFE) *Zone A, V, A99*
- With BFE or Depth *Zone AE, AO, AH, VE, AR*
- Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD
- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone X*
- Future Conditions 1% Annual Chance Flood Hazard *Zone X*
- Area with Reduced Flood Risk due to Levee. See Notes. *Zone X*
- Area with Flood Risk due to Levee *Zone D*

OTHER AREAS
- NO SCREEN Area of Minimal Flood Hazard *Zone X*
- Effective LOMRs
- Area of Undetermined Flood Hazard *Zone D*

GENERAL STRUCTURES
- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

OTHER FEATURES
- 20.2 / 17.5 Cross Sections with 1% Annual Chance / Water Surface Elevation
- Coastal Transect
- 513 Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

MAP PANELS
- Digital Data Available
- No Digital Data Available
- Unmapped

N

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 12/17/2025 at 12:34 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

CHARACTERIZATION OF GROUND AND SURFACE WATER RESOURCES

BRIAN FREEMAN, TRUSTEE FOR THE JEFFREY B. FREEMAN TRUST, AND BRIAN SCOTT HOLDINGS, INC. – FREEMAN PROPERTY

LEE COUNTY FLORIDA

PREPARED BY
David Brown, P.G.

RESPEC
6561 Palmer Park Circle, Suite D
Sarasota, Florida 34238

FEBRUARY 9, 2026

RESPEC

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FIGURES

APPENDICES

RESPEC

EXECUTIVE SUMMARY

The owners of the subject property, Brian Freeman, Trustee for the Jeffrey B. Freeman Trust, and Brian Scott Holdings, Inc., propose to develop a commercial project on what will herein be referred to as the "Freeman Property." The property is located south of State Highway 82 (Immokalee Road) and west of Alabama Road South, approximately ten miles east of Interstate 75 in Lee County, Florida, and encompasses approximately 187 acres.

A prominent feature of the northern portion of the property is a raised earthen berm constructed for World War II military training exercises. This triangular berm, occupying approximately 15 acres (about 8 percent of the site), significantly alters the natural hydrology of the northern section by disrupting predevelopment surface-water flow patterns. Similar historic military features are common along the south side of State Highway 82 and are easily identifiable in aerial imagery.

Based on the Florida Land Use and Cover Classification System (FLUCCS) mapping from the South Florida Water Management District (SFWMD), approximately 92.5 acres (roughly 50 percent) of the site are classified as improved pasture. Historic aerial photography indicates that much of this area was intensively drained to support past agricultural activities both on and adjacent to the site. Numerous ditches and swales traverse the central and southern portions of the property, reflecting extensive hydrologic modification. These features also facilitated the drainage of historic wetlands, including a large circular wetland in the south-central portion that has been bisected by an east–west drainage ditch, contributing to the site's highly disturbed condition. Remaining natural communities identified by the SFWMD include pine and oak forest, palmetto prairie, hydric pine, wet prairie, and cypress heads. Despite these significant alterations, the property lies within Lee County's Density Reduction/Groundwater Resource (DR/GR) area.

Given the extent of previous disturbance, the proposed development presents an opportunity to restore hydrologic connections and enhance surface water communication with the surrounding DR/GR lands to the south. The stormwater management system will be designed to reestablish historic flow patterns, allowing seasonal high surface waters to move toward the southeastern portion of the property, consistent with predevelopment drainage conditions. The military training berm will be removed, and the reclaimed area will be integrated into the site plan.

In alignment with the project's hydrologic restoration goals, the proposed irrigation system will utilize surface water stored within dedicated stormwater–irrigation supply ponds (wet detention areas) to offset groundwater use. The recycling and reuse of stormwater will not only reduce reliance on groundwater for irrigation but also enhance overall water quality through natural settling and filtration processes. These same ponds will also promote recharge to the underlying aquifer systems, providing additional benefits to the DR/GR area.

The irrigation system will be designed to seasonally supplement stored surface water with groundwater on an as-needed basis, thereby reducing overall groundwater demand while maintaining irrigation reliability. Pre- and post-construction monitoring will be conducted to evaluate hydrologic performance, water quality improvements, and system efficiency. Collectively, these measures advance hydrologic restoration, water conservation, and resource protection consistent with the policies and objectives of

the Lee Plan, establishing a robust framework for groundwater and surface-water protection within the DR/GR.

1.0 INTRODUCTION

The owners of the subject property, Brian Freeman, Trustee for the Jeffrey B. Freeman Trust, and Brian Scott Holdings, Inc., propose to develop a commercial project on land located east of Daniels Parkway and south of State Highway 82 (Immokalee Road), approximately ten miles east of Interstate 75 in Lee County, Florida. The site lies within Sections 13 and 24, Township 45 South, Range 26 East, and encompasses approximately 186.83 acres.

According to the SFWMD, approximately 92.5 acres (about 50 percent) of the property are classified as improved pasture, while the remaining areas consist of pine and oak forest, palmetto prairie, hydric pine, wet prairie, and cypress heads.

During World War II, the northern portion of the site was used as a military training facility, resulting in the construction of a triangular bermed area located south of State Highway 82. In addition, the property has been utilized for agricultural purposes since the early 1970s, when an extensive network of farm ditches was installed to support drainage and cultivation. The combination of military-related construction and historic agricultural activities has led to the property's highly disturbed condition and altered hydrology observed today.

As shown in **Figure 1**, and despite the site's substantial hydrologic alteration, the property is located within Lee County's DR/GR land-use category. As illustrated in **Figure 2**, the County has identified two resource classifications on the site: (1) DR/GR, corresponding primarily to the improved pasture areas, and (2) wetlands. This mapping does not fully reflect the extent of historic hydrologic disturbance that has occurred onsite. Nevertheless, the property's disturbed condition presents a unique opportunity to enhance and restore its hydrologic function through thoughtful site planning and design.

In accordance with The Lee Plan, proposed developments within the DR/GR must demonstrate the protection, preservation, and enhancement of both groundwater resources and environmental systems, including wetlands. The designation of "Groundwater Resource" within this land-use category underscores the importance of safeguarding the County's Aquifer Systems (i.e., the Water Table and Sandstone Aquifers), which provide a critical existing and future drinking water supply. The proposed commercial development, together with the resource management objectives outlined herein, provides an opportunity for the property to contribute to the ongoing restoration and hydrologic reclamation of the DR/GR.

2.0 PROPERTY SETTING

Prior to agricultural development, the subject property was predominantly characterized as open rangeland and pine flatwoods, interspersed with shallow freshwater forested/shrub wetlands and emergent wetland areas. As shown in **Figure 3**, the property is situated within the Estero River sub-

watershed of the DR/GR, with surface water flows generally directed southwest toward the Lee County coastline.

The earliest available aerial imagery, dating to 1944 and shown in **Figure 4**, illustrates the triangular berm associated with the military training facility and indicates the presence of semi-connected wetland features in the northwest portion of the site. A large circular wetland in the south-central portion of the property remained undisturbed at that time. By 1958, as shown in **Figure 5**, the site remained largely unaltered, although farming activities were beginning to expand, with cultivated fields north of the property, now part of Lehigh Acres, approaching the site boundaries. Agricultural use of the area increased substantially in the early 1970s, particularly along the site's eastern boundary, which bordered large-scale row crop operations. To facilitate drainage of adjacent farm fields, three large east–west ditches were excavated, including one that completely bisected the south-central circular wetland. These ditches interrupted historic surface water flow paths, a modification clearly visible in the 1970 aerial imagery provided as **Figure 6**.

By 1995, the cumulative effects of agricultural ditching and drainage were clearly evident across the site. Parallel north–south ditches had been constructed along the southeastern boundary, extending into the adjacent forested wetland system to the south. A gridwork of row crop drainage furrows is also apparent in the south-central portion of the property. Collectively, these modifications—superimposed on the site since the early 1940s, have substantially altered natural hydrology, effectively disconnecting the property from its historical contributions to surrounding DR/GR lands. **Figure 7**, a January 1995 aerial photograph, clearly illustrates the extent and collective impact of these agricultural alterations.

Drainage features such as those described above are typical of agricultural operations in south Florida, as they facilitate the removal of excess surface water, thereby extending the growing season and enabling cultivation of crops sensitive to saturated soils. However, these hydrologic alterations can also promote the establishment and spread of exotic and nuisance plant species. Areas most heavily impacted by historic farming activities are classified as cropland and pastureland according to the FLUCCS, as shown in **Figure 8** (SFWMD data). Onsite inspections indicate that a significant portion of these areas are currently dominated by exotic and nuisance vegetation, further reflecting the altered hydrologic and ecological condition of the property.

The aggregate extent of disturbance and drainage is further evident in LiDAR imagery. As shown in **Figure 9**, the site generally exhibits relatively flat topography, with the highest elevation of approximately 37.5 feet NAVD88 occurring at the top of the military berm immediately south of Highway 82. The lowest elevations, around 25 feet NAVD88, occur within depressional wetland areas, drainage ditches, and the borrow pits used to construct the military berm. The Digital Elevation Model (DEM) derived from Lee County LiDAR data illustrates the gradual southeastward topographic gradient and highlights the agricultural drainage ditches and furrows traversing the site.

Although no detailed flood maps are available for the project site, the Federal Emergency Management Agency (FEMA) National Flood Hazard Map indicates that the property lies within Flood Zone X, which is defined as an area of minimal flood hazard. Wetlands on the site are identified by the National Wetland Inventory (NWI) and include areas northwest and west of the military berm, the circular south-central wetland, and the forested wetland in the southern portion of the property. These NWI-designated wetlands are illustrated in **Figure 10**.

3.0 EXISTING GROUNDWATER RESOURCES

There are three (3) principal aquifer systems underlying the subject property: 1) the unconfined Surficial Aquifer System (SAS), 2) the confined Intermediate Aquifer System (IAS), and 3) the confined Floridan Aquifer System (FAS). Please note that, in order to simplify the nomenclature used in this report, the colloquial term "Water Table Aquifer" will be used interchangeably to describe the SAS, and the terms "Sandstone Aquifer" and "Mid-Hawthorn Aquifer" will be used to describe the upper and middle producing units of the IAS, respectively. In central Lee County, groundwater quality decreases rapidly with depth and potable supplies generally occur at depths of less than 300 feet below land surface (bls). Below these depths, groundwater becomes highly mineralized, saline, and is typically artesian. Consequently, groundwater is primarily withdrawn from depths shallower than 300 feet bls.

Suitable water quality and quantity for agricultural or commercial irrigation at the project location is available from both the Water Table and Mid-Hawthorn Aquifers. However, based on the hydrogeology in the vicinity of the property, the overall yield of the Water Table Aquifer is considered low and may only be acceptable for low volume livestock watering. Therefore, the confined Mid-Hawthorn Aquifer will be utilized.

3.1 SURFICIAL AQUIFER SYSTEM

The unconfined SAS (Water Table Aquifer) originates at land surface, with its uppermost portion composed of approximately 8 to 17 feet of unconsolidated surficial deposits consisting of gray to dark-brown, fine-grained silty quartz sand with minor shell content. Below these surficial sands, the Tamiami Formation includes the Ochopee and Buckingham Limestone Members, as well as the Pinecrest Sand Member of the Tamiami Formation (Green, Campbell, and Scott, 1990). Uneven upper contacts of limestones are associated with the Tamiami Formation.

Where present onsite, the sands and marls of the Tamiami Formation extend from approximately 17 to 30 feet bls, which is significantly thinner than the Formation's vertical extent found throughout the DR/GR areas located to the south and southeast (Johnson, 1986). Further indication of the differences of the geology onsite as compared to DR/GR areas located to the south and southeast is the lack of nearby active mining operations which excavate the thicker sequences of the upper Tamiami Formation's limestone. These observations support the aforementioned contrast of the relatively thin nature of both the Tamiami Formation and the Water Table Aquifer at the project location as compared to the bulk of the DR/GR.

The limestones of the Tamiami Formation can serve as a major regional source of groundwater supply in Lee County due to its shallow depth and high transmissivity. Historically, agricultural operations and other water users have taken advantage of the ease with which water supplies can be developed in the near-surface Tamiami Formation when thick limestones are present. However, due to its relatively thin vertical extent onsite, groundwater withdrawals from the unconfined Water Table Aquifer are more likely to have a greater impact on wetlands and existing legal users than withdrawals from deeper sources. The proposed groundwater withdrawals for irrigation will be from the deeper, confined Mid-Hawthorn Aquifer,

which is not expected to impact Water Table Aquifer water levels and environmental systems and therefore provide protection to the shallow water resources within the DR/GR.

The Lee Plan's DR/GR Land Use Category also includes areas that have been designated as important recharge areas for the shallow Water table Aquifer. The reported recharge rate to the SAS is estimated to be between one and ten inches per year (Krulikas, Giese, 1995). However, given the existing onsite drainage ditches, the opportunity for recharge to the underlying SAS at the project location is considered relatively low.

3.2 INTERMEDIATE AQUIFER SYSTEM

Immediately beneath the Tamiami Formation are relatively thick sequences of low-permeability clayey sediments that separate the Water Table Aquifer from the underlying Sandstone Aquifer. Below the Sandstone Aquifer is the Peace River Mid-Hawthorn confining unit, which separates the Sandstone and Mid-Hawthorn Aquifers. Within Lee County, the top of the Mid-Hawthorn Aquifer ranges from 105 to 374 feet bls, averaging 208 feet bls. The thickness of the Mid-Hawthorn Aquifer averages approximately 125 feet (AECOM and CDM, 2010).

The Mid-Hawthorn Aquifer is predominantly composed of biomicritic limestone, phosphate, shell and lime mud, associated with the Arcadia Formation of the Hawthorn Group (Geddes, Richardson, and Dodd, 2015). Because low-permeability sediments separate the Mid-Hawthorn Aquifer from the overlying Sandstone Aquifer, groundwater withdrawals from the Mid-Hawthorn Aquifer are unlikely to cause significant drawdown in the Sandstone Aquifer, which serves as a domestic water source in the area.

4.0 PROPOSED IRRIGATION SUPPLIES

A review of existing reclaimed water infrastructure indicates that no such pipelines are located in proximity to the property. Consequently, all irrigation demands will be met primarily using surface water captured in onsite stormwater management lakes, with seasonal augmentation from groundwater on an as-needed basis. The conceptual site layout includes several stormwater management lakes, designed to capture, store, and reuse stormwater for irrigation, thereby reducing reliance on groundwater resources. During periods of prolonged drought, however, surface water availability within the lakes may be limited. In such instances, lake levels are proposed to be minimally supplemented using groundwater from the Mid-Hawthorn Aquifer. Based on the most recent engineering schematics, approximately 12.41 acres of common areas will require irrigation, and it is estimated that up to two (2) Mid-Hawthorn Aquifer wells may be needed to augment surface water supplies during dry periods.

An analysis of irrigation requirements was performed using the SFWMD modified Blaney-Criddle irrigation allocation spreadsheet. As shown in **Appendix A,** the 12.41 acres of landscape will require an annual allocation of 15.94 million gallons (or 43,669 gallons per day). These quantities are proposed to be roughly split (halved) by the two proposed irrigation pumping facilities indicated on **Figure 11**.

The combined use of surface and groundwater for irrigation is expected to optimize water resource conservation, ensuring that groundwater withdrawals are minimized whenever sufficient surface water is

available. This integrated approach enhances the project's sustainability and ensure that the project's groundwater use is low-impact and fully compatible with the protective intent of Lee Plan Policies 2.3.1 and 2.3.2, including the County's goals for safeguarding the DR/GR groundwater resource area. Therefore, the proposed withdrawals are consistent with Lee Policy 2.3.2.

5.0 GROUNDWATER FLOW MODELING

To demonstrate that the proposed use of the Mid-Hawthorn Aquifer for supplemental irrigation will not cause adverse impacts to surrounding existing legal users, a single-layer groundwater flow model was developed using capabilities of AquiferWin32 to evaluate potential drawdown impacts resulting from the proposed maximum monthly withdrawals.

The analytical groundwater modeling scenario includes one stress period that represents transient / future or proposed conditions and was run for 90 days with no recharge to simulate the maximum monthly allocation for the three driest months of the year (March, April, and May). The Hantush and Jacob, 1955 (Leaky Aquifer) solution was utilized in this modeling scenario.

The results of the 90-day maximum monthly modeling scenario are shown for the Mid-Hawthorn Aquifer in **Figure 12.** The greatest drawdown predicted to occur as a result of the requested maximum month quantity is approximately 0.83 feet and occurs within the property boundary at the proposed well nodes. Per Section 3.1.2 of the SFWMD's Applicant Handbook, modeling analyses must include proposed wells, as well as any other permitted groundwater withdrawals within the "cone of depression" of proposed use. SFWMD defines the "cone of depression" of the proposed use as the 1.0-foot drawdown contour for confined aquifer systems. However, as shown in **Figure 12**, no drawdown greater than 1.0 foot is predicted as a result of the maximum monthly groundwater model. Therefore, the potential for harm to occur to existing legal users as a result of the requested allocation is considered to be de minimis and not adverse and a cumulative impact assessment was not performed.

A statement from a Professional Geologist certifying the results of these groundwater flow modeling scenarios is provided herein as **Attachment B** and the required modeling files will be provided to District staff under a separate cover.

6.0 HYDROLOGIC RESTORATION

Given the extensive hydrologic alterations that have historically occurred onsite, the proposed commercial development presents a strategic opportunity to restore and enhance the natural hydrologic connectivity of the property, thereby reestablishing functional interactions with the broader DR/GR area. The engineered stormwater management system is designed to emulate pre-development hydroperiods, capturing, conveying, and attenuating surface water flows to minimize offsite impacts while promoting groundwater recharge. Concurrently, targeted wetland restoration activities, including enhancement of native wetland vegetation, will reinstate the site's natural water retention and filtration functions. The systematic removal of nuisance and exotic plant species will further support hydrologic function by improving surface water flow, reducing evapotranspiration from invasive species, and

allowing native flora to stabilize soil and enhance groundwater-surface water interactions. Collectively, these measures are expected to significantly enhance the site's hydrologic character, restore ecological functionality, and integrate the property into the regional water balance and DR/GR hydrologic network. The proposed commercial site plan is included as **Figure 13**. As shown, several large stormwater management lakes (wet detention areas) are proposed.

7.0 ENHANCED LAKE MANAGEMENT PRACTICES

To ensure the long-term protection and sustainability of water resources within the DR/GR, the following suite of site-specific management practices is proposed for the commercial development. It is essential to recognize that as the project transitions through the construction phase, partial construction, and ultimately reaches full post-construction operation, the associated Best Management Practices (BMPs) must be adaptively implemented and refined to correspond with each stage, thereby maintaining continuous protection of surface water and groundwater resources. The proposed framework incorporates a combination of hydrologic, ecological, and operational measures designed to minimize impacts, enhance water quality, and support regional groundwater-surface water interactions.

Specific measures include restrictions on the use of motorized vessels within the project's stormwater management lakes to prevent sediment resuspension, erosion, and nutrient redistribution, thereby preserving lake water quality and aquatic habitat integrity. Additionally, a detailed Enhanced Lake Management Plan (ELMP) is included below that addresses sediment control, vegetative management, and nutrient reduction strategies. Collectively, these measures establish a robust, stage-specific framework to safeguard and sustain the hydrologic and ecological functions of the DR/GR. It is important to note that the subject property is not within a Wellfield Protection Zone.

7.1 CONSTRUCTION BEST MANAGEMENT PRACTICES

During construction of the proposed development, the greatest potential for impacts is associated with increased turbidity and/or potential spills of fuels/oils (hydrocarbons), otherwise known as Volatile Organic Compounds (VOCs) used to power earthmoving equipment, etc. The developer/owner will ultimately be responsible for maintaining compliance with applicable BMPs. The site's general contractor shall also be responsible in assuring that each contractor or subcontractor evaluates their respective work areas before construction is initiated to determine if site conditions pose specific problems for the safe and secure handling of any regulated substances. When obtained, the SFWMD Environmental Resource Permit (ERP) will also have requirements to safeguard water resources during construction.

7.2 POST-CONSTRUCTION BEST MANAGEMENT PRACTICES

After the development's stormwater management system is completed, the primary focus of the BMPs will be to maintain the quality of the lakes (i.e., wet detention areas) since all internal runoff will be routed to these features for treatment. It is also anticipated that the developer/owner will be responsible for the perpetual operation and maintenance of all aspects of the stormwater management system, including

the lakes. Responsibilities will also include maintaining all stormwater conveyance features and lake level control components or outfalls.

7.3 DEEP LAKE MANAGEMENT

As shown in **Figure 13**, there are several stormwater detention lakes, all of which are proposed to be deeper than 12 feet in depth. In accordance with Lee County Land Development Code Section 10-329(d)(3), these lakes are therefore designated as "deep lakes" and are subject to specific criteria.

Based on Lee County Code, the proposed deep lakes will satisfy the following criteria:

1. The stormwater detention deep lakes will not exceed a maximum water depth of 20 feet and will not penetrate any continuous impervious layer of soil or rock.
2. A destratification (i.e., aeration) system will be installed in any lake that exceeds a 12-foot water depth. Documentation that the proposed destratification system is adequately sized and designed for each lake deeper than 12 feet will be submitted to Lee County for approval. An example of a deep lake aeration device is provided as **Appendix C**.
3. Native shade trees, meeting the specifications of Lee County Land Development Code Section 10-420 will be planted around each deep lake perimeter, at approximately one tree per 100 feet of lake shoreline measured at the detention lake's water level control elevation. Trees and other plants may be grouped or clustered together around the lake perimeter.
4. The deep lake management techniques, including operation of the destratification system, will be maintained for the life of the lake and will be recorded in the development's covenants in accordance with the County Attorney's office.
5. A post-construction bathymetric survey verifying each deep lake's finished water depth, sealed by a professional surveyor and mapper, will be submitted to Lee County for approval.

7.4 OPERATION AND MAINTENANCE OF THE STORMWATER MANAGEMENT SYSTEM

Proper stormwater lake maintenance is a critical component of surface water resource protection and long-term hydrologic functionality. The developer/owner will assume perpetual responsibility for the removal of all nuisance and exotic vegetation from the stormwater management system. Lakes will undergo annual inspections, during which any prohibited vegetation will be removed using manual (hand-clearing) methods or appropriate chemical treatments. Only aquatic-approved chemical compounds will be utilized, and all herbicide and algaecide applications will be performed in strict accordance with manufacturer specifications by a licensed professional applicator who meets all applicable Lee County requirements. All applicable local, state, and federal regulations will be observed to ensure compliance and minimize environmental impacts.

Fertilizer application on all irrigated areas will adhere strictly to Lee County's Fertilizer Ordinance. Individuals applying fertilizers must possess the required limited certification under Florida Statute (F.S.) 482.1562 before applying any compounds. Fertilizer formulations and application rates will comply fully with local regulatory requirements to prevent nutrient overloading and downstream water quality degradation.

The application of pesticides, herbicides, and fungicides on common areas will also be performed exclusively by licensed professional applicators, in accordance with manufacturer specifications, and in compliance with all local, state, and federal guidelines. Such treatments will be applied only in response to documented pest, disease, or invasive species issues, and only at the rates and frequencies recommended by the manufacturer. Preventative, broad-spectrum applications of pesticides, herbicides, or fungicides will be strictly prohibited, ensuring that chemical usage is targeted, environmentally responsible, and protective of both aquatic and terrestrial resources within the development.

7.5 WATER QUALITY MANAGEMENT PRACTICES

In 1990, the Florida Department of Environmental Protection (FDEP) developed and implemented the Water Resource Implementation Rule, codified as Chapter 62-40 of the Florida Administrative Code (FAC). This rule establishes the regulatory framework and implementation guidelines for the State's stormwater management program under Section 62-40.431. As stated in Ch. 62-40.431(2)(a), "The primary goals of the state's stormwater management program are to maintain, to the maximum extent practicable, during and after construction and development, the pre-development stormwater characteristics of a site; to reduce stream channel erosion, pollution, siltation, sedimentation and flooding; to reduce stormwater pollutant loadings discharged to waters to preserve or restore designated uses..."

The criteria outlined in Chapter 62-40, as applied through the SFWMD ERP program, provide reasonable assurance that the surface water resources of the DR/GR will be adequately protected and maintained. By maintaining surface water systems, concomitant protection is afforded to shallow groundwater resources, particularly since the proposed stormwater management system lakes will be excavated to depths extending below the local water table. This interaction between surface and groundwater enhances groundwater recharge, thereby improving the hydrologic function and overall water resource sustainability within the DR/GR. If requested, supplemental information detailing water quality maintenance practices for the stormwater management system can be provided with the first Development Order (DO) application.

To further safeguard the resource, a single baseline surface water quality sampling event is proposed for the onsite central wetland area prior to the commencement of any construction activities. This background sampling event will provide a reference condition against which post-construction water quality can be evaluated and will include analysis for the following analytes:

- Chlorophyll A (mg/m^3)
- Total Kjeldahl Nitrogen (mg/L)
- Ammonia (mg/L)
- Nitrate (mg/L)
- Total Phosphorus (mg/L)

Field parameters to be measured during sampling include:

- Turbidity (NTUs)

- Water Depth (feet bls)
- Specific Conductance (µs/cm)
- pH (SU)
- Dissolved Oxygen (mg/L)
- Temperature (°C)

An annual surface water monitoring program is proposed with samples collected once per year during the wet season (June through September). The program will begin with a single baseline sampling event, to be collected at the south-central wetland followed by repeat sampling events over a period of five (5) consecutive years. All sampling will target the same analytes established during the baseline event, providing a consistent and comparable dataset for evaluating temporal trends in water quality and the effectiveness of the site's stormwater and wetland management practices. Additionally, two (2) of the proposed stormwater management lakes will be sampled during the wet season to assess water quality conditions and verify compliance with applicable water quality standards. These lakes, together with the central wetland sampling location, are identified on **Figure 14**. The data collected through this program will support ongoing assessment of the stormwater management system's performance, including nutrient retention, sediment control, and the protection and enhancement of both surface water and groundwater resources within the DR/GR.

8.0 CONCLUSION

The proposed Commercial Planned Development represents a significant opportunity to restore and enhance a property that has been extensively disturbed and hydrologically compromised. The development incorporates a multifaceted water resource management strategy, prioritizing the protection, preservation, and enhancement of both surface and groundwater systems within the designated DR/GR area. Key components include engineered stormwater management infrastructure, targeted retention and detention systems, and systematic removal of exotic and nuisance vegetation, collectively designed to restore natural hydrologic connectivity, promote aquifer recharge, and improve downstream water quality. The integrated approach aligns with applicable regional water management objectives, including maintenance of wetland function and compliance with DR/GR policies, and demonstrates a proactive commitment to sustainable land use practices. Overall, the project is anticipated to substantially improve ecological function, enhance hydrologic resilience, and provide long-term environmental benefits on a property historically characterized by significant hydrologic alteration.

RESPEC

9.0 REFERENCES

AECOM and CDM, 2010, *Integrated Water Resources Master Plan Summary Report,* Lee County Utilities.

Geddes, E., Richardson, E., and Dodd, A., 2015, *Hydrogeologic Unit Mapping Update for the Lower West Coast Water Supply Planning Area: Technical Publication WS-35,* SFWMD.

Green, R. C., Campbell, K. M., and Scott, T. M., 1990, *Core Drilling project: Lee, Hendry and Collier Counties: FGS Open-File Report 37,* FGS.

Johnson, R. A., 1986, *Shallow Stratigraphic Core Tests on File at the Florida Geological Survey: FGS Information Circular 103,* FGS.

Krulikas, R. K., Giese, G. L., 1995, *Recharge to the surficial aquifer system in Lee and Hendry counties, Florida,* United States Geological Survey (USGS), SFWMD.

FIGURES

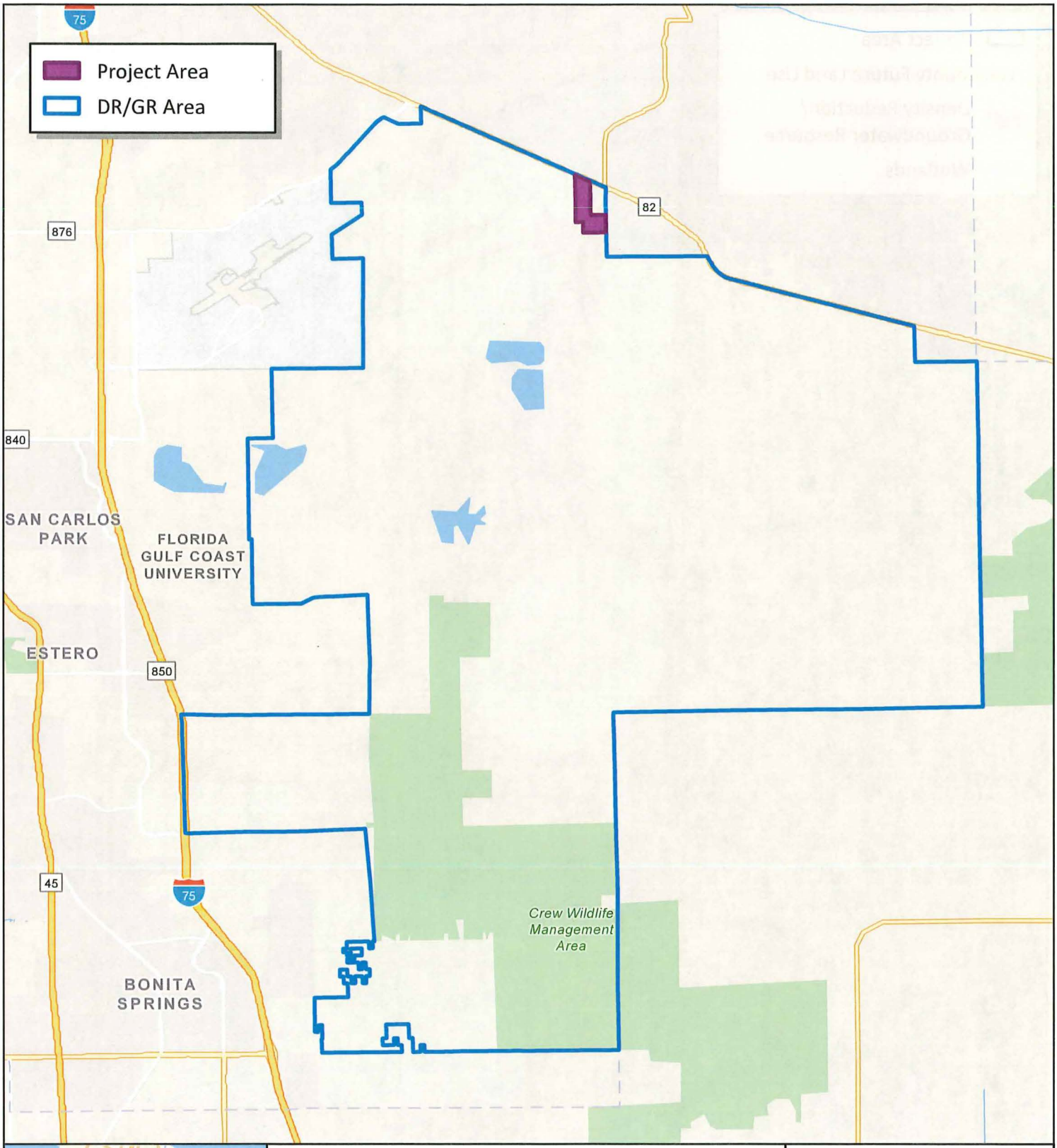

Figure 1
Southeast Lee County DR/GR Special Planning Area
Freeman Property
Lee County, Florida

N

0 0.75 1.5 3 Mi

Scale: 1:150,000

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09/17/2025

Image: Esri Imagery, Lee County

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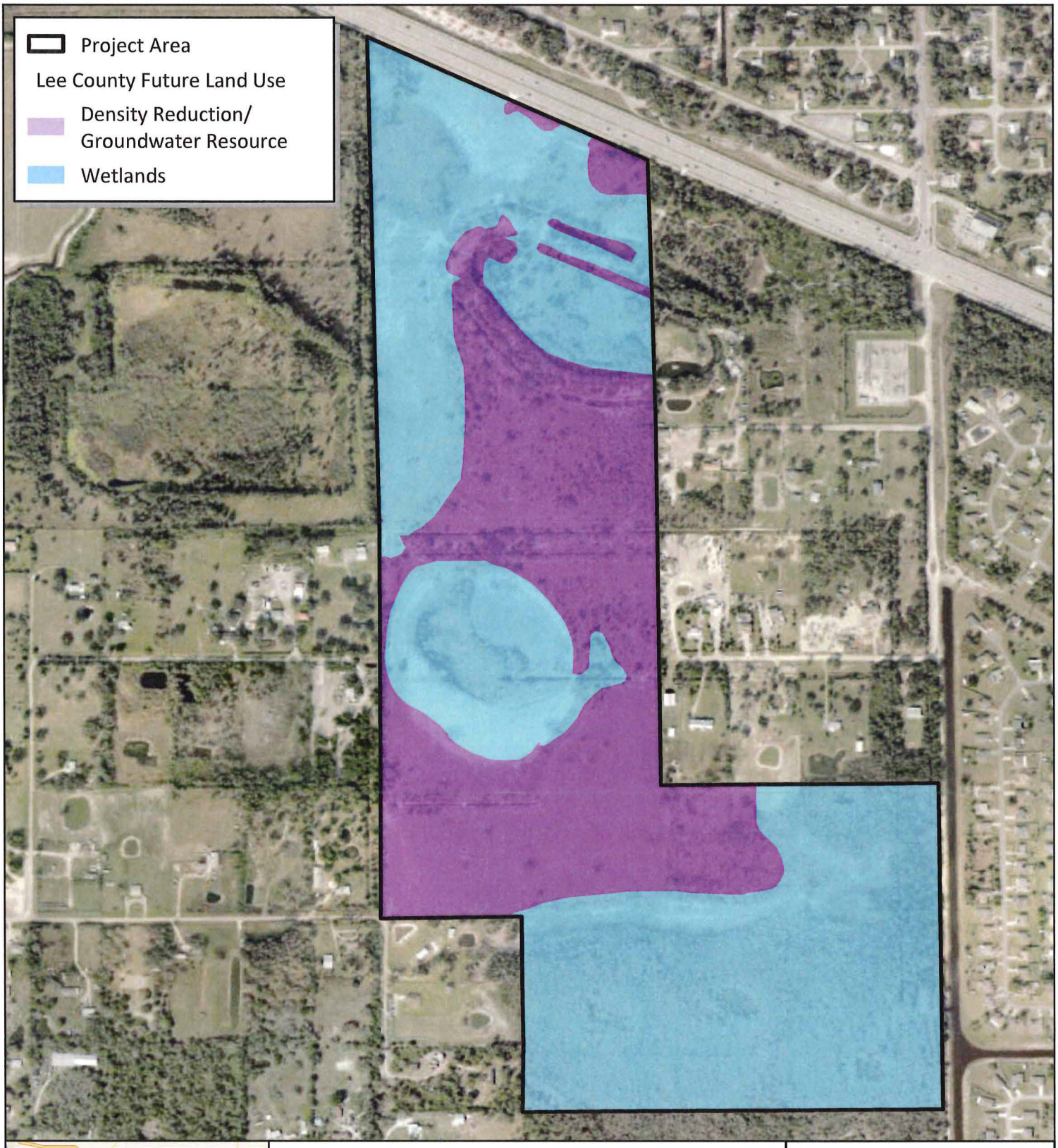

Figure 2
Lee County Future Land Use
Freeman Property
Lee County, Florida

N

0 150 300 600 Feet

Scale: 1:8,000

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Image: Lee County, Esri Imagery

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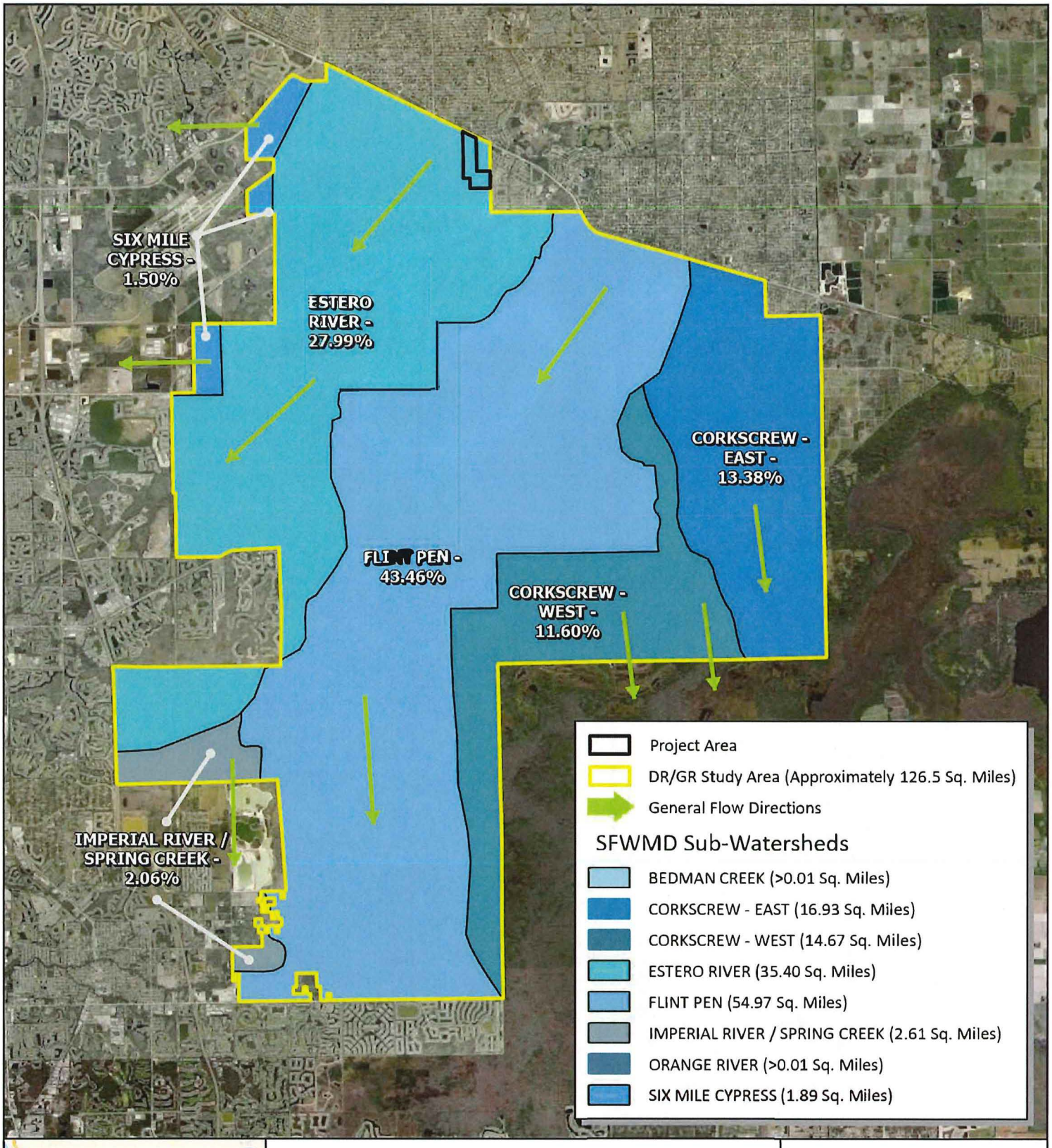

Figure 3
SFWMD Sub-Watersheds Within DR/GR
Freeman Property
Lee County, Florida

N

0 1.25 2.5 Mi

Scale: 1:150,000

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Image: Esri Imagery

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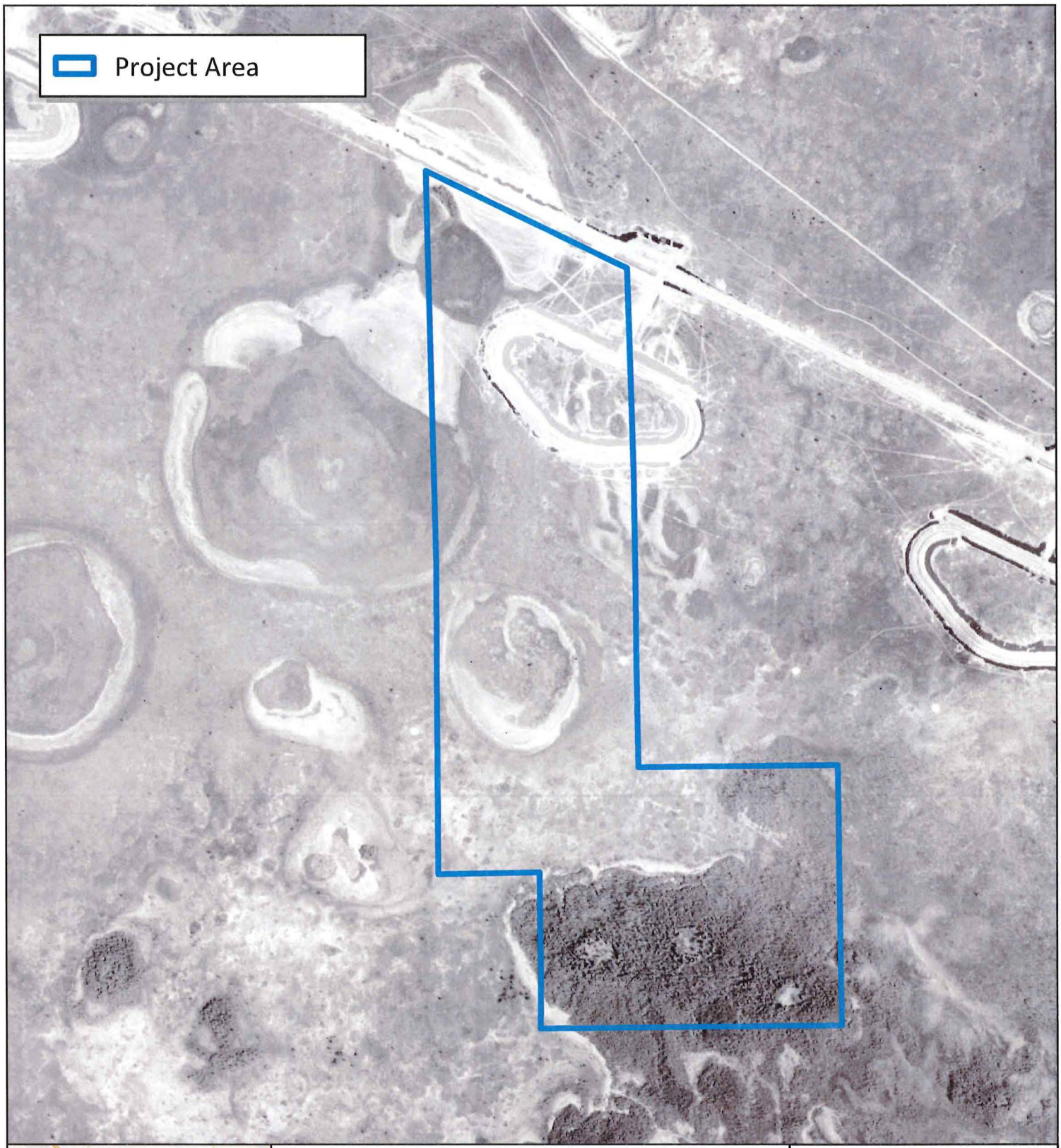

Figure 4
1944 Historical Imagery
Freeman Property *Lee County, Florida*

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Scale: 1:10,000

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Image: UFDC

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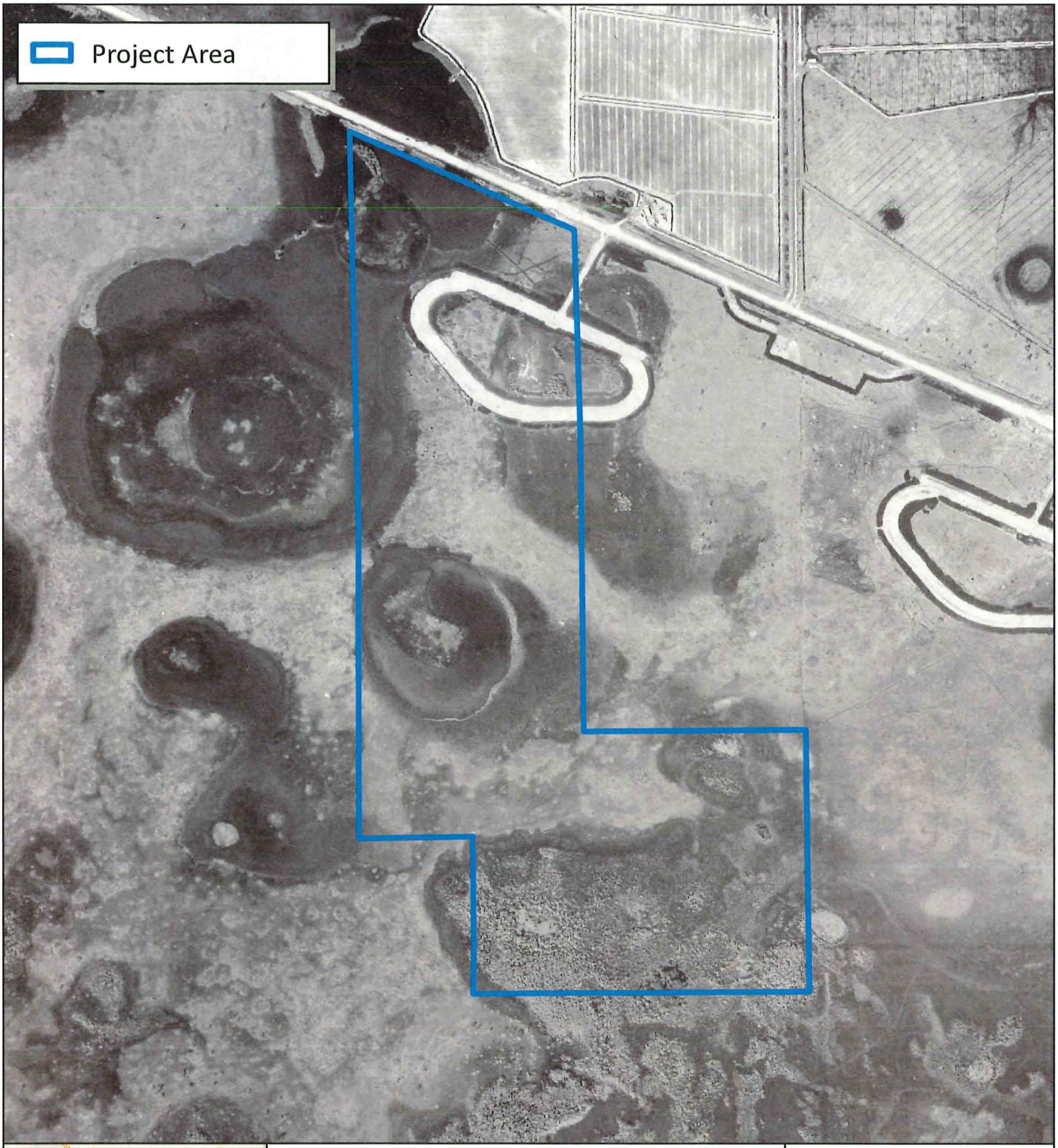

Figure 5
1958 Historical Imagery
Freeman Property *Lee County, Florida*

N

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Scale: 1:10,000

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Figure 6
1970 Historical Imagery
Freeman Property
Lee County, Florida

N

0 350 700 Feet

Scale: 1:8,000

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Image: UF, Esri Imagery

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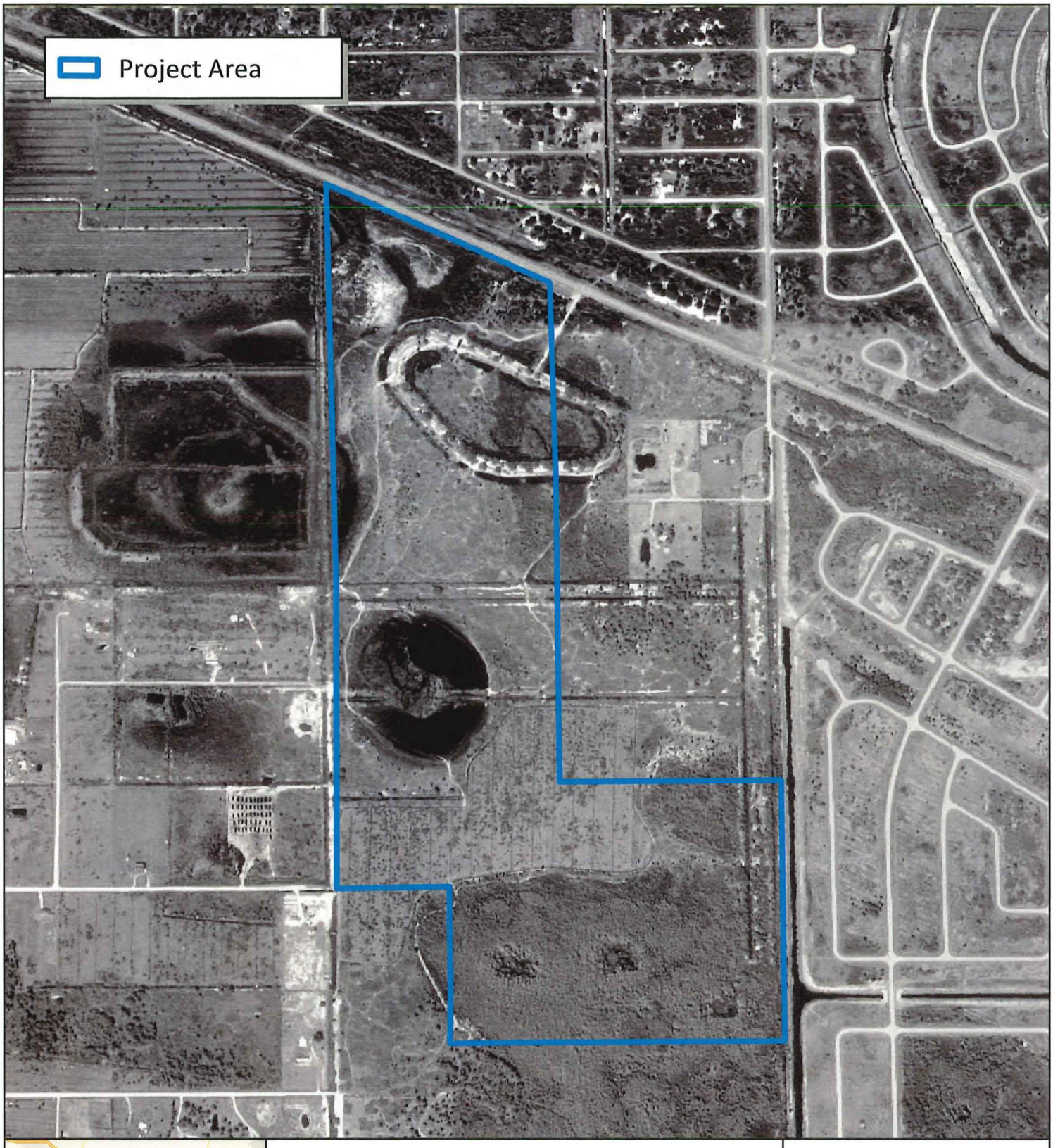

Figure 7
1995 Historical Imagery
Freeman Property *Lee County, Florida*

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Scale: 1:10,000

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Image: UFDC

RESPEC

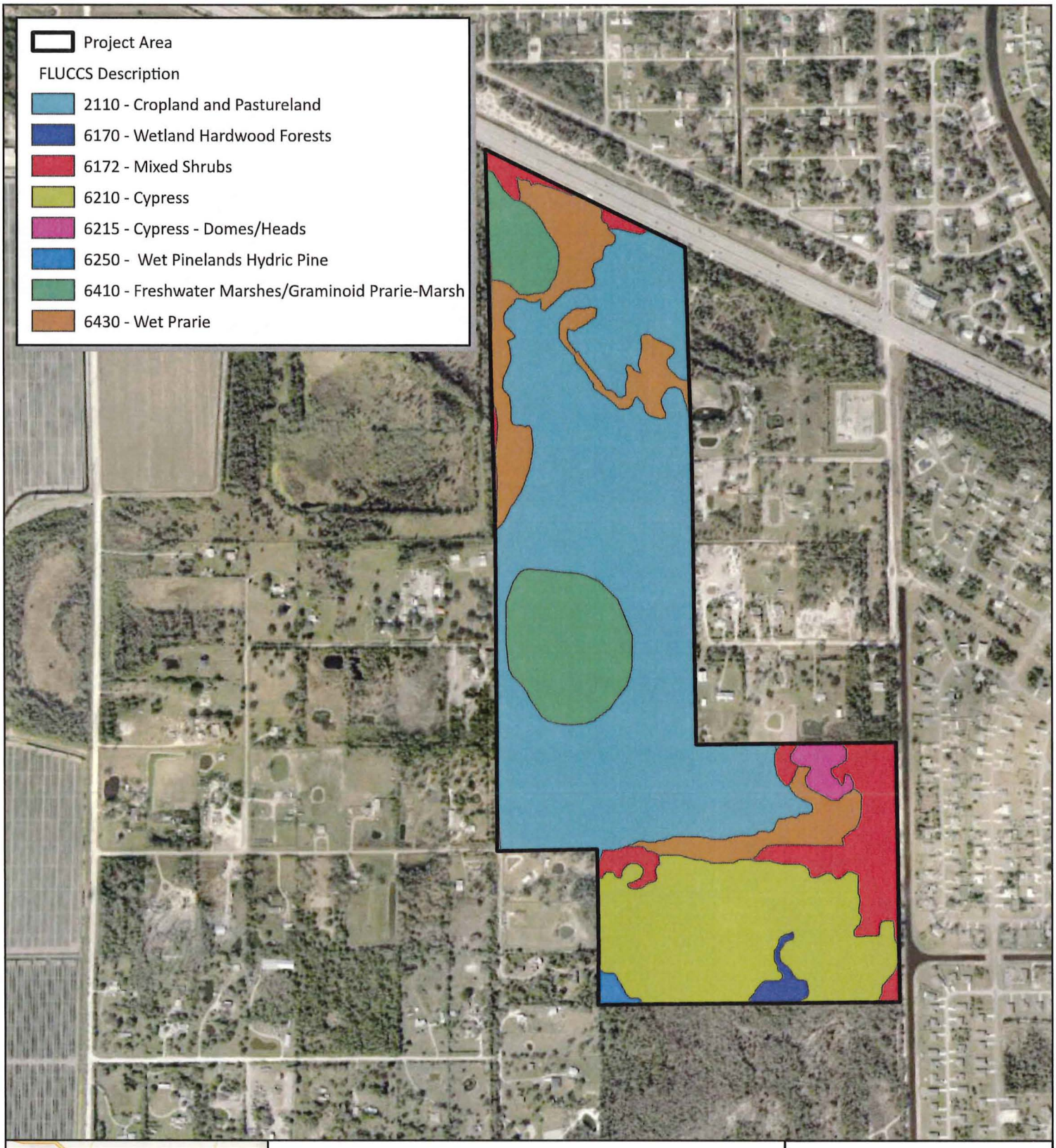

Figure 8
SFWMD FLUCCS Classifications
Freeman Property
Lee County, Florida

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Scale: 1:10,000

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Image: Esri Imagery, SFWMD

RESPEC

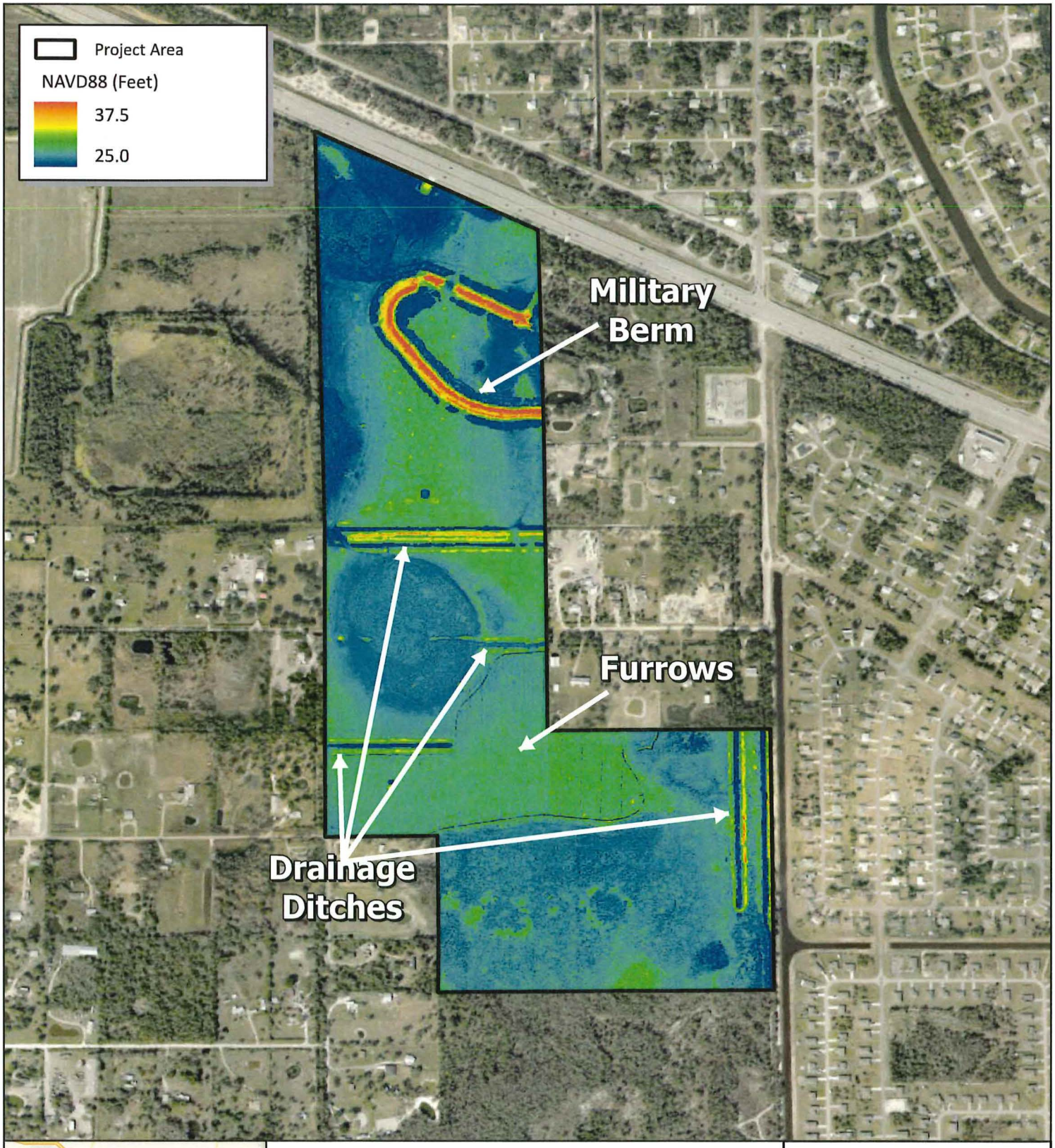

Figure 9
LiDAR Imagery
Freeman Property
Lee County, Florida

N

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Scale: 1:10,000

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Image: Esri Imagery, Florida State Government

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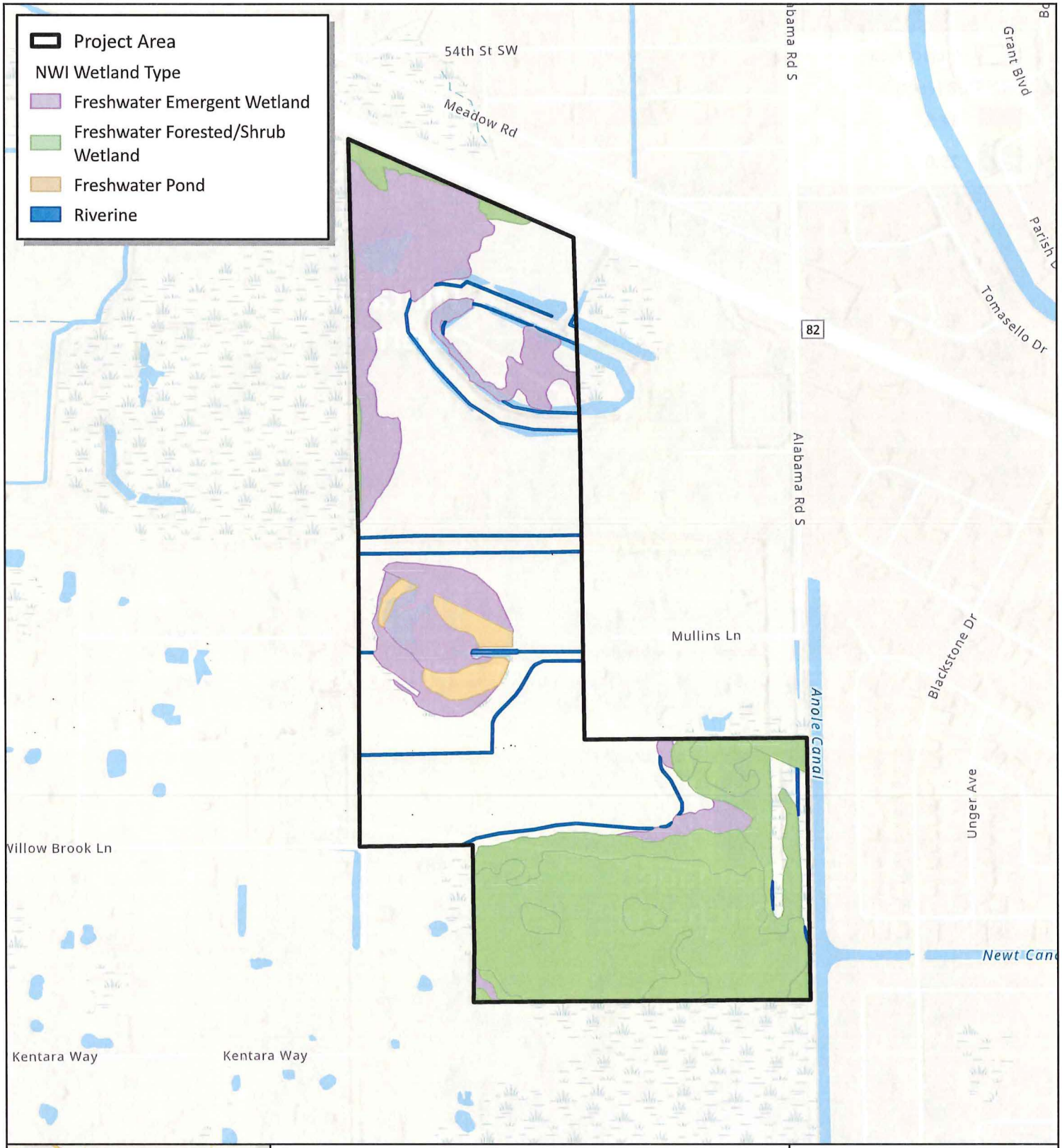

Figure 10
NWI Inventory
Freeman Property
Lee County, Florida

N

0 250 500 1,000 Feet

Scale: 1:10,000

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Image: Esri Imagery, US Fish and Wildlife Service

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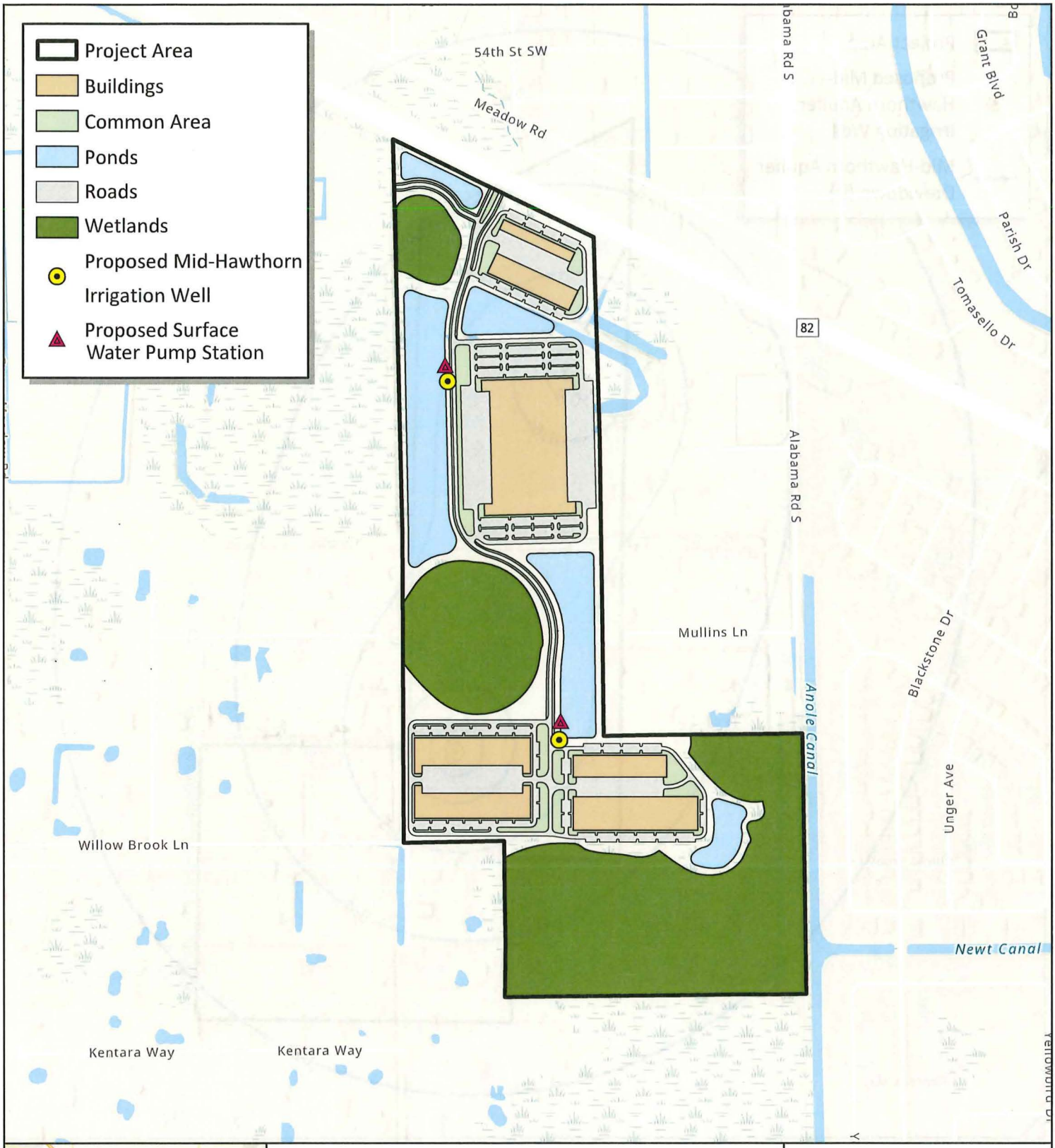

Figure 11

Proposed Irrigation Facility Locations
Freeman Property
Lee County, Florida

N

0 250 500 1,000 Feet

Scale: 1:10,000

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Image: Esri Imagery, RVI Planning

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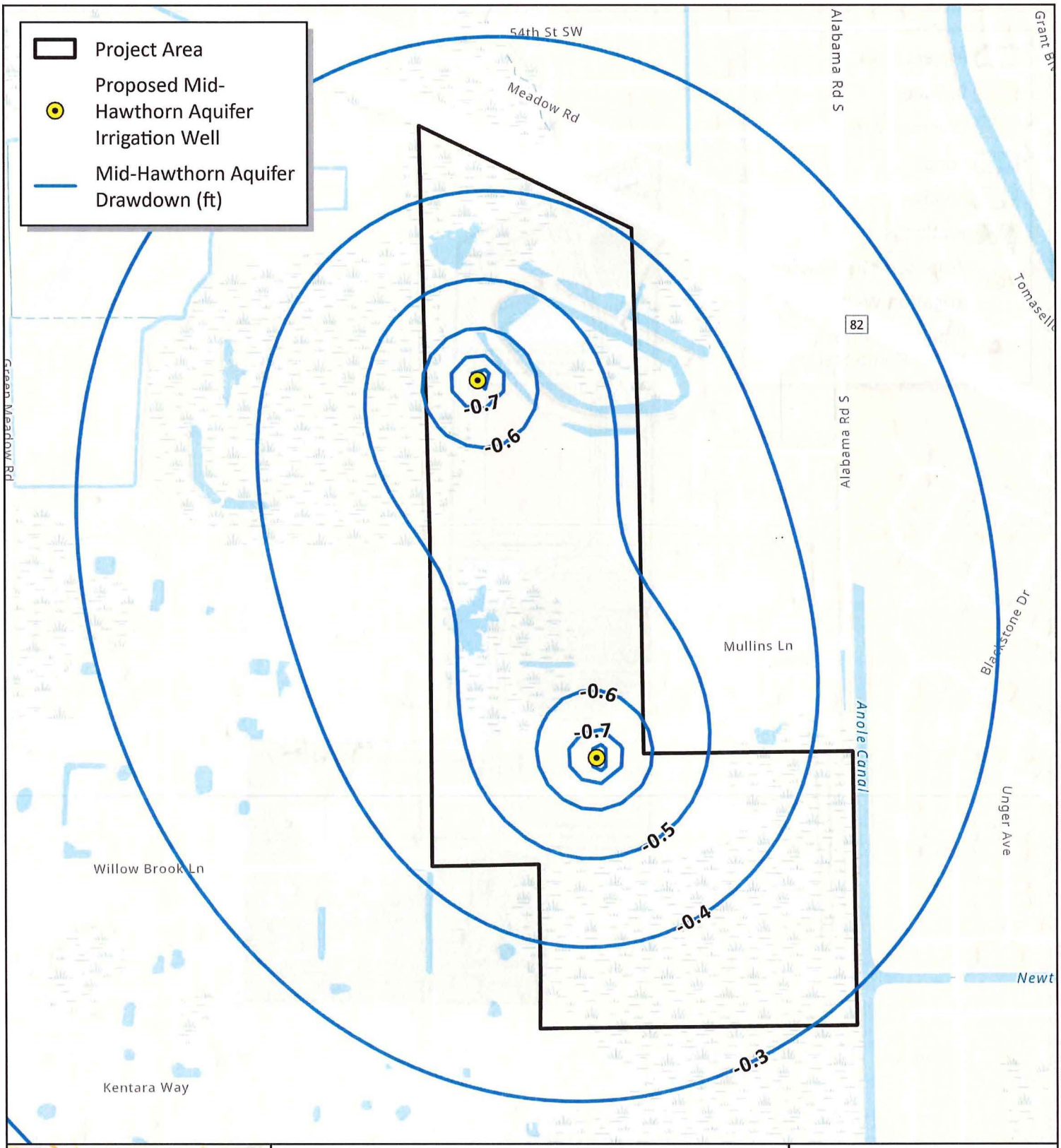

Figure 12
Predicted Mid-Hawthorn Aquifer Drawdown
Max Monthly Groundwater Modeling Scenario
Freeman Property
Lee County, Florida

N

0 250 500 1,000 Feet

Scale: 1:9,500

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2/9/2026

Image: ESRI World Topographic Map

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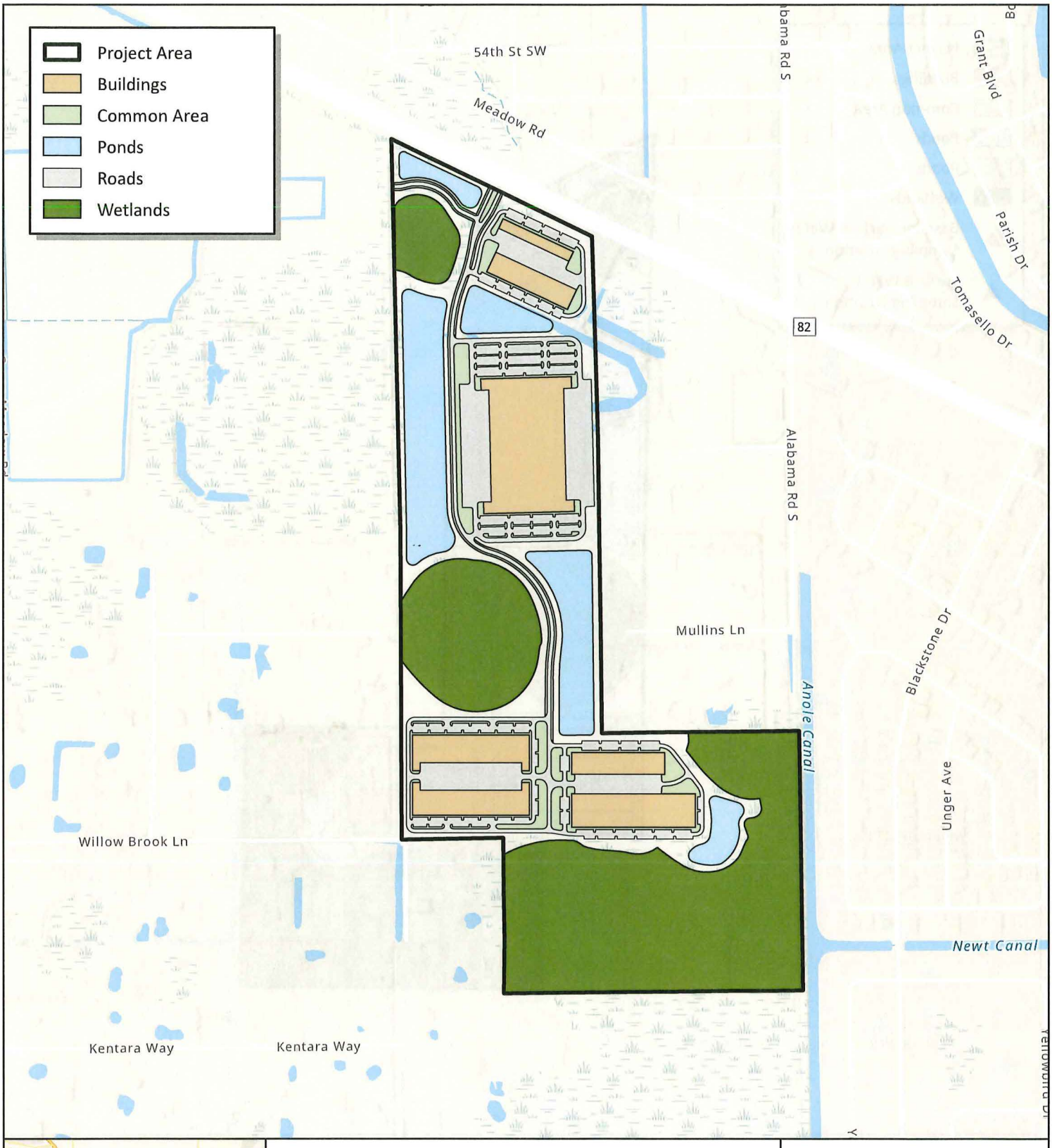

Figure 13
Conceptual Site Plan
Freeman Property
Lee County, Florida

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0 250 500 1,000 Feet

Scale: 1:10,000

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Image: Esri Imagery, RVI Planning

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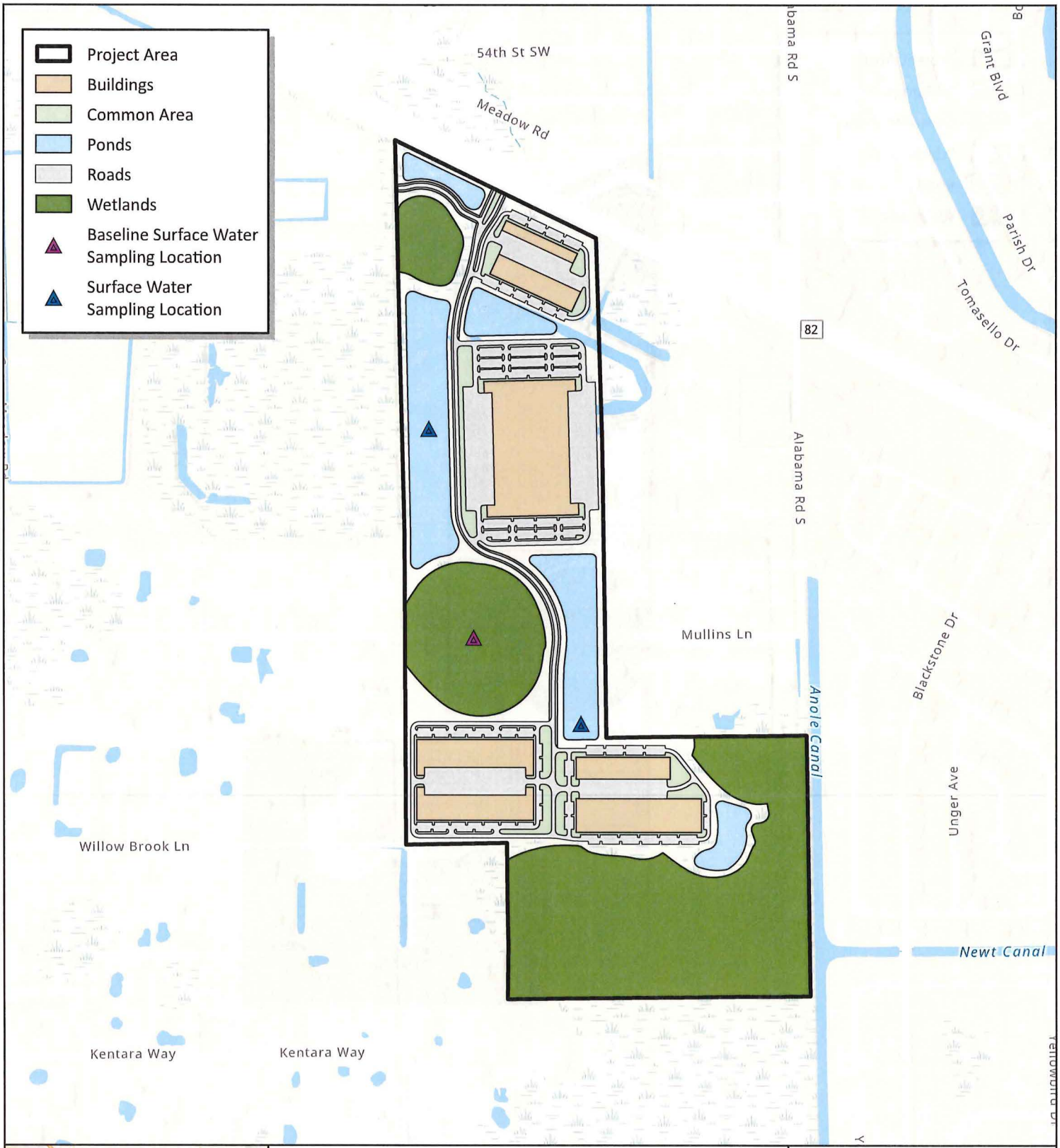

Figure 14
Proposed Surface Water Sampling Locations
Freeman Property
Lee County, Florida

N

0 250 500 1,000 Feet

Scale: 1:10,000

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10/17/2025

Image: Esri Imagery, RVI Planning

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APPENDIX A: BLANEY CRIDDLE IRRIGATION DEMANDS

RESPEC

Calculations of Irrigation Requirements (1-in-10)

Rainfall Station:	Ft. Myers 1-in-10	**Crop No.:** 1	
Irrigation System:	Sprinkler	**Parcel Name:**	
Irrigated Acreage:	12.41	**Crop No. in Parcel:** 1	
Crop:	Turf Grass		
Soil Type:	0.80		
Multiplier	1.30		
Efficiency	0.77		

Calculations	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Average Rainfall (inches)	1.90	2.00	1.50	1.90	4.10	9.40	8.70	8.60	8.40	3.50	1.50	1.50	53.00
Evapotranspiration (inches)	1.86	2.14	3.70	5.11	6.83	7.60	8.05	7.72	6.48	4.92	3.07	2.15	59.63
Average Effective Rainfall (inches)	0.88	0.94	0.79	1.06	2.31	4.91	4.71	4.58	4.19	1.81	0.76	0.72	27.66
1-in-10 Effective Rainfall (inches)	0.74	0.79	0.66	0.89	1.94	4.12	3.96	3.85	3.52	1.52	0.64	0.61	23.24
Average Irrigation (inches)	0.98	1.20	2.91	4.05	4.52	2.69	3.34	3.14	2.29	3.11	2.31	1.43	31.97
1-in-10 Irrigation (inches)	1.12	1.35	3.04	4.22	4.89	3.48	4.09	3.87	2.96	3.40	2.43	1.54	36.39

1-in-10 Annual Supplemental Crop Requirement = 36.39 inches

Annual Supplemental Crop Water Use:

36.39 inches X 12.41 Acres X 1.3 X 0.02715 MG/AC-IN = 15.94 MG

1-in-10 Maximum Monthly Supplemental Crop Requirement = 4.89 inches

Maximum Monthly Supplemental Crop Water Use:

4.89 inches X 12.41 Acres X 1.3 X 0.02715 MG/AC-IN = 2.14 MG

Notes:
Evapotranspiration was calculated using a modified Blaney-Criddle method.
Average effective rainfall is the amount that is useful to crops in an average year
Drought rainfall is the rainfall minimum representative of a 1-in-10 year drought
Drought effective rainfall is the amount that is useful to crops in a 1-in-10 year drought event.
Average irrigation is the net amount that should be required for maximum yields during an average year.
Drought irrigation is the net amount that should be required for maximum yields during a 1-in-10 year drought.

EXHIBIT

APPENDIX B: PROFESSIONAL GEOLOGIST CERTIFICATION

6561 PALMER PARK CIRCLE
SUITE D
SARASOTA, FL 34238
941.552.5657

Professional Geologist Certification

The groundwater flow modeling impact analysis included as part of this document titled "*Characterization of Ground and Surface Water Resources*" for the Freeman property in Lee County, Florida, was completed based on sound geologic principals and the hydrogeologic data available at the time this modeling analysis was performed. The parameters and discretization of simulated withdrawals from the aquifer system are considered to be reasonably accurate; therefore, the Professional Geologist below certifies the results of the model as they pertain to the predicted groundwater impacts. All the preceding geological analysis and interpretation(s) were evaluated and supervised by Devin Lemke, P.G., a Registered Professional Geologist pursuant to Chapter 492, Florida Statutes, (F.S.) and Chapter 61G16, Florida Administrative Code, F.A.C.

DEVIN LEMKE
LICENSE
No. PG3270
STATE OF FLORIDA
PROFESSIONAL GEOLOGIST

2/9/2026

Devin Lemke, P.G. No. 3270
RESPEC Company, LLC
Professional Geologist

Date

APPENDIX C:
DEEP LAKE AERATION DEVICE

RESPEC

Vertex Water Features
Pond and Lake Aeration
BOTTOM AERATION

With Vertex MicronBubble™ Technology

AIR3 XL2™

The Vertex Air3 XL2™ pond aerator is a super-efficient, affordable and safe system. In a typical pond, an Air3 XL2™ can aerate approximately 3-4 acres depending on shape, slope, oxygen demand and other factors. A 1/2hp (0.37kW) Brookwood™ SafeStart™ compressor, housed in our rustproof aluminum outdoor cabinet, feeds three bottom mounted CoActive AirStations™ utilizing Vertex's MicronBubble™ technology. The rising force of millions of bubbles circulates the entire water column, entraining bottom water up to the surface allowing vital oxygen to be absorbed and poisonous gasses expelled. With no electricity in the water, Vertex's aeration systems are safe for any type of water recreation.

Our systems have a full 3-year Vertex warranty, excluding wearable parts (air filters and compressor maintenance kits) plus a Limited Lifetime warranty against rust and corrosion on the cabinet, 5-year warranty on the AirStations™ and a 15-year warranty on BottomLine™ supply tubing.

FEATURES

AIRSTATIONXL2™

- Total pumping capacity of up to 11,400 GPM
- Six 9" flexible membrane discs with MicronBubble™ technology
- Shallow water Airstation optional for depths lower than 8'
- Self-cleaning, low maintenance
- Powder-coated stainless steel self-sinking base unit designed to prevent sinking into soft bottom sediments
- 5-year "No Questions" warranty

BROOKWOOD™ COMPRESSOR

- 3-year Vertex warranty, excluding wearable parts (air filters and compressor maintenance kits)
- Vertex SafeStart™ Technology
- UL, 115v or 230v, 35 Max PSI
- Thermal overload protection
- 1/2hp (0.37kW): low electrical costs
- 2-3 year extended duty cycle between scheduled maintenance

QUIETAIR™ CABINET

- Class "A" GFCI protection on all 115v circuits
- Powder coated aluminum for a durable attractive finish
- High capacity 290 CFM fan
- Easy access design with cam lock
- Easy plug-in connection to waterside electrical service
- Disconnect switch
- Heavy duty, light weight mounting pad included
- Sound dampening kit optional
- Limited lifetime warranty against rust

BOTTOMLINE™ TUBING

- Over-sized I.D. for high flow
- Self-weighted for easy installation
- Available in 100' and 500' increments
- 15-year Vertex warranty

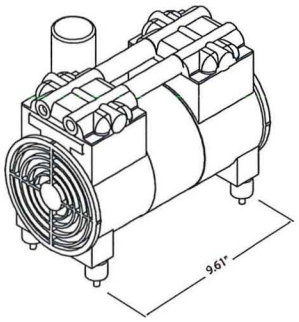
BENEFITS TO THE LAKE

- High pumping rate easily penetrates stratification layers
- Circulates entire water column
- Increases oxygen levels throughout water column
- Promotes beneficial bacteria growth
- Prevents low oxygen fish kills
- Reduces nutrient levels and associated algae growth
- Oxidizes/reduces bottom muck
- Expands oxygenated habitat for improved fisheries
- Reduces aquatic midge and mosquito insect hatches
- Eliminates foul odors from undesirable dissolved gases
- Safe entry – no electricity in the water
- Extremely energy efficient

SPECIFICATIONS: AIR3 XL2™ LAKE AERATION SYSTEM

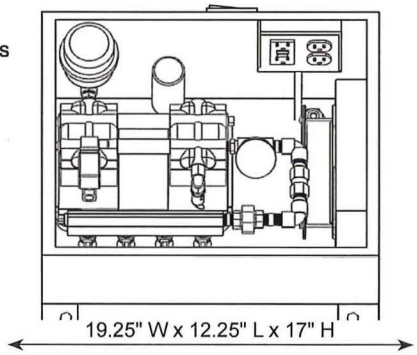
BROOKWOOD™ COMPRESSOR

1/2hp (0.37kW), 115v or 230v, Single Phase piston type compressor. Built for continuous 24/7 operation and equipped with Vertex SafeStart™ technology allowing auto restart under maximum rated pressure without motor damage. Super-duty Brookwood™ compressors incorporate upgraded rotors, stators, valve plates, bearings and capacitors and are thermally protected, oil-free, and require no lubrication; just periodic cleaning of included washable air filter. Extended duty cycle is approximately 2 to 3 years for compressor maintenance, about 2 to 3 times the duty cycle of ordinary piston and rotary vane compressors. All Brookwood™ SafeStart™ compressors carry a 3-year Vertex warranty, excluding wearable parts (air filters and compressor maintenance kits).



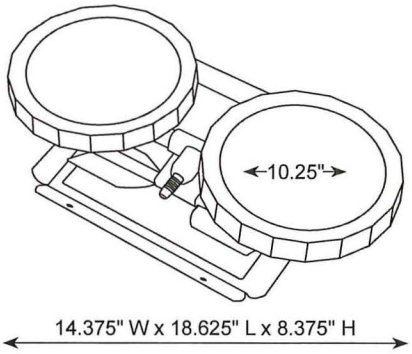
QUIETAIR™ CABINET

Enclosure comes equipped with cam lock for security, fully gasketed and constructed of aluminum with gray electrostatically-bonded powder coating to provide Limited Lifetime warranty against cabinet rust and corrosion. Enclosure furnished with stamped ventilation grills to insure forced air circulation and an integral cooling fan with thermal protection, producing 290 CFM to guard against excessive compressor operating temperatures. Cabinet provided with HDPE mounting pad. Enclosure comes with class a GFCI protection on both the compressor and fan circuits. Quick disconnect switch included. Side mounted muffler box and additional insulation optional for quiter operation.



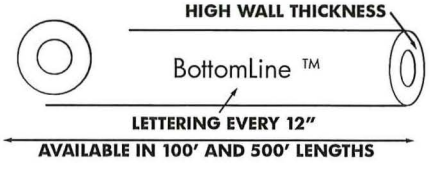
AIRSTATION XL2™ ASSEMBLY

Diffuser station consists of two self-cleaning, 9" diameter, flexible membrane diffusers of EPDM compound with 100% rebound memory, each producing millions of fine 500 to 3000 micron bubbles – the majority 500 to 1000 microns. Each diffuser station base unit is made of powder-coated stainless steel and designed to prevent settling into soft bottom sediments. AIRSTATION™ is designed with adjustable diffuser riser to accommodate any site requirements. AirStations are independently tested and verified to provide stated pumping rates. 5-year warranty.



BOTTOMLINE™ SUPPLY TUBING

Self-weighted, direct burial submersible tubing for connection from compressor to diffuser stations. Tubing is flexible PVC composite construction for use with standard PVC solvent weld cement and insert fittings. Tubing has 0.58" I.D. and high wall thickness for long term durability and protection against punctures. Remains flexible in cold temperatures.



Vertex Water Features
Pond and Lake Aeration

(844) 432-4303 • info@vertexwaterfeatures.com
www.vertexwaterfeatures.com

Install all electrical equipment in accordance with Article 682 of the National Electrical Code and all local codes. Vertex Water Features reserves the right to improve and change our designs and/or specifications of our aerators without notice or obligation.

FREEMAN SR 82

INDIGENOUS PRESERVE MANAGEMENT PLAN

January 2026

Prepared For:

RVi Planning + Landscape Architecture
c/o: Fred Drovdlic – Director of Planning
1514 Broadway, Suite 201
Fort Myers, FL 33901
Phone: (239) 318-6707
Email: fdrovdlic@rviplanning.com

Prepared By:

BearPaws Environmental Consulting
1599 Covington Circle East
Phone: (239) 340-0678
Email: BearPaws.Env.Consulting@GMail.com

INTRODUCTION

The 186.52± acre Freeman SR 82 site is located in Sections 13 & 24, Township 45S, and Range 26E, of Lee County, Florida. More specifically, the site is located immediately south of SR 82, east of Green Meadow Road, and west of Alabama Road South, in Fort Myers, Florida. Please see the attached Project Location Map (Exhibit A).

BACKGROUND

This mitigation plan includes the enhancement of the 68.83± acres of the Lee County indigenous preserve area located within the SR 82 Freeman MPD (Exhibit B). The site contains approximately 61.89± acres of wetlands and 5.06± acres of upland areas that are being preserved. The upland preserves are comprised of pine flatwoods and mixed upland hardwoods with various ranges of nuisance and exotic vegetation such as melaleuca (*Melaleuca quinquenervia*), earleaf acacia (*Acacia auriculiformis*), and Brazilian pepper (*Schinus terebinthifolius*). The wetlands within the project area include willow, mixed wetland hardwoods, freshwater marsh, and wet prairie wetlands with varying coverage of exotics including melaleuca (*Melaleuca quinquenervia*), Brazilian pepper (*Schinus terebinthifolius*), primrose willow (*Ludwigia peruviana*), and torpedo grass (*Panicum repens*). See the attached Preserve and Impact Map (Exhibit C).

MITIGATION & MAINTENANCE PLAN

The purpose of this plan is to ensure that preserves are maintained exotic free in perpetuity and nuisance plants are controlled to healthy levels through a scheduled maintenance program. The list of exotic and nuisance plant species are defined under the Lee County Land Development Code (LDC), Section 10-420(h). This program is incorporated into a two-phase process: the initial exotic removal and the subsequent annual maintenance. The exotic and nuisance plant removal and maintenance program will ensure the viability, value, and aesthetics of the preserve. The exotic plant removal and maintenance program will be implemented by and the responsibility of the owner or their successor. Exotic and nuisance plants often dominate native plants, which in return reduces habitat values, consequently, negatively impact aesthetic values. Exotic and nuisance plants will be killed in a manner consistent with the LDC, Section 10-415(b)(4), following current approved exotic and nuisance plant removal practices and will occur in spring and/or fall.

All small exotic saplings and exotic shrubs are to be treated in place. All large exotic trees, with greater than 4-inch DBH, will be cut at stump height and removed from the preserve area; the remaining stumps will be treated in place. Any trees too large to be practically cut will be treated standing in place, upon environmental staff approval. Any herbicides applied will be required to be EPA approved and conducted with a tracer dye. All exotic vegetation removed from the preserve area will be to be taken off- site and disposed of; there will be no exotics stockpiled within the preserve area. Any staging areas for the removal of exotic debris will be placed outside of the preserve, and the exact location will be determined by the contractor.

The County requires all Category I and II species to be removed from preserves and not exceed a level of 5 percent, per LDC Sec. 10-420(h). Native nuisance coverage will be expected to be maintained as necessary. Exotic and nuisance plants will be killed in a manner consistent with current approved removal practices; all removal practices will be conducted according to current standards and applied by a licensed herbicide applicator. The established preserve maintenance program will be conducted in perpetuity.

The on-site preserve area provides habitat for nesting and create foraging areas for all kinds of wildlife species. On-site enhancement activities will be conducted concurrently with the on-site construction

activities. These enhancement activities will include the hand removal of exotic and nuisance vegetation from the upland preserve area. The exotics to be eradicated include, but are not limited to, melaleuca (*Melaleuca quinquenervia*), and Brazilian pepper (*Schinus terebinthifoloius*). This program is incorporated into a two-phase process: the initial exotic removal and the subsequent annual maintenance.

DEBRIS REMOVAL

Debris and garbage in the will be removed as needed within the preserve area. No large debris is currently located within the preserve area. Any garbage found will be removed from the preserve and disposed of in the proper receptacles.

MITIGATION SUCCESS CRITERIA

Monitoring of the Lee County indigenous preserve areas shall be conducted for a minimum of five years with annual reports submitted to Lee County. At the end of the first monitoring period, the mitigation area shall contain an 80% survival rate of planted vegetation. The 80% survival rate shall be maintained throughout the remainder of the monitoring program, with replanting as necessary. if native wetland, transitional, and upland species (in upland preserve areas) do not achieve an 80% coverage within the initial two years of the monitoring program (obligate and facultative wet species exceed facultative species in wetland areas), native species shall be planting in accordance with the maintenance program. At the end of the monitoring program, the entire mitigation area shall contain an 80% survival rate of planted vegetation and 80% coverage of desirable obligate and facultative wetland species.

All wetland and upland mitigation areas will consist of no more than five percent cover by exotic and/or nuisance species at all. Exotic and nuisance vegetation species are identified as those exotic species listed as CAT I and CAT II by the Florida Invasive Species Council (FISC). The preserve areas will be managed such that exotic/nuisance plant species do not dominate any one section of areas within the preserves. This is also applicable to native vegetation to ensure diversity within the wetland habitats. Perpetual maintenance of the preserve areas is recommended to ensure coverage by native desirable vegetation is maintained as specified in the permit.

If monitoring reports or other information show the preserved wetlands have been negatively affected by the permitted development in a manner that is irreversible (such as impounding the wetland and drowning the existing vegetation or a reduction in the hydro-period resulting in the transition of wetlands into upland/transitional habitat), the permittee shall be required to submit a remediation plan within 30 days of notification by the County's Environmental Compliance staff of such conditions. The remediation plan may include on-site or off-site mitigation as necessary to address any deficiencies.

MONITORING

Monitoring Methodology

The proposed monitoring of the Lee County indigenous preserve area will begin concurrently with construction and will consist of baseline, time-zero, and annual monitoring of vegetation, wildlife, rainfall, and wetland water levels. The baseline monitoring report will document conditions in the project site as they currently exist. The time-zero report will document the conditions immediately following completion of mitigation activities. The annual reports will document the extent of success of the project and, if needed, identify specific actions to be taken to improve the conditions within the project area. Sampling transects and methodology for the baseline, time-zero, and annual reports will utilize identical methods of data collection from identical sampling stations. The location of the proposed sampling stations will be taken along the edge of the preserve areas, immediately adjacent to the upland buffer area.

Vegetation Monitoring
Wetland vegetation will be monitored prior to and following enhancement and restoration activities. Sampling in wetland area will involve canopy, sub-canopy, and ground cover species established within the Lee County indigenous preserve area. Species richness and a visual estimate of percent cover will be calculated for canopy and sub-canopy stratum. The approximate locations of the sampling point locations will be shown on the monitoring map.

Sampling point locations will be established in several locations within the preserve area. During each monitoring event, these areas will be walked and any exotic vegetation observed will be noted within the report. Vegetation will be sampled in each of the areas from where the monitoring photographs were taken; this vegetative sampling includes canopy, sub-canopy, and herbaceous strata.

Wildlife Monitoring
Regular observations of wildlife will be made during the monitoring event by qualified ecologists. Observations will consist of recording evidence and signs of wildlife (i.e., direct sightings, vocalizations, burrows, nests, tracks, droppings, etc.).

Photographic Documentation
Permanent fixed-point photograph stations will be established in the Lee County indigenous preserve area providing physical documentation of the condition and appearance of an area, as well as any changes taking place within it. Monitoring photographs will accompany vegetation data in each report. Locations of photograph stations will remain the same throughout the duration of the monitoring program.

Rainfall and Hydrological Monitoring
Annual rainfall readings will be obtained and recorded from an official rain gauge at a nearby location. In addition, direct hydrologic observations will be noted during each monitoring event by a qualified ecologist. The annual rainfall and direct hydrologic observations will be included within each of the monitoring reports.

MONITORING REPORTS

Concurrently with construction, the permittee will submit annual monitoring reports to the County documenting the success of the mitigation program and general condition of the preserve area. Within 60 days of permit issuance or modification, the baseline wetland monitoring for the preserve area will be submitted to the County. The time-zero monitoring report will be submitted within 60 days of completion of enhancement activities. Annual monitoring reports will include the following information:

- Brief description of mitigation and maintenance work performed since the previous report along with a discussion of any modifications to the mitigation or maintenance program.
- Brief description of anticipated mitigation and maintenance work to be conducted over the next year.
- Results of quantitative vegetation monitoring conducted in the preserved wetland area.
- A list of observed wildlife species.
- Monitoring photographs taken at photograph stations within the preserved wetlands area.
- Hydrologic data and available local rainfall data.

MAINTENANCE AND LONG-TERM MANAGEMENT

Following the completion of the initial exotic removal effort upon the commencement of construction, annual inspections of the mitigation area will occur for the first five (5) years. During these inspections, the mitigation area will be traversed by a qualified ecologist. Locations of nuisance and/or exotic species will be identified for immediate treatment with an appropriate herbicide. Any additional potential problems will also be noted and corrective actions taken. Once exotic/nuisance species levels have been reduced to acceptable limits (i.e., less than five percent cover), inspections of the preserve area will be conducted annually.

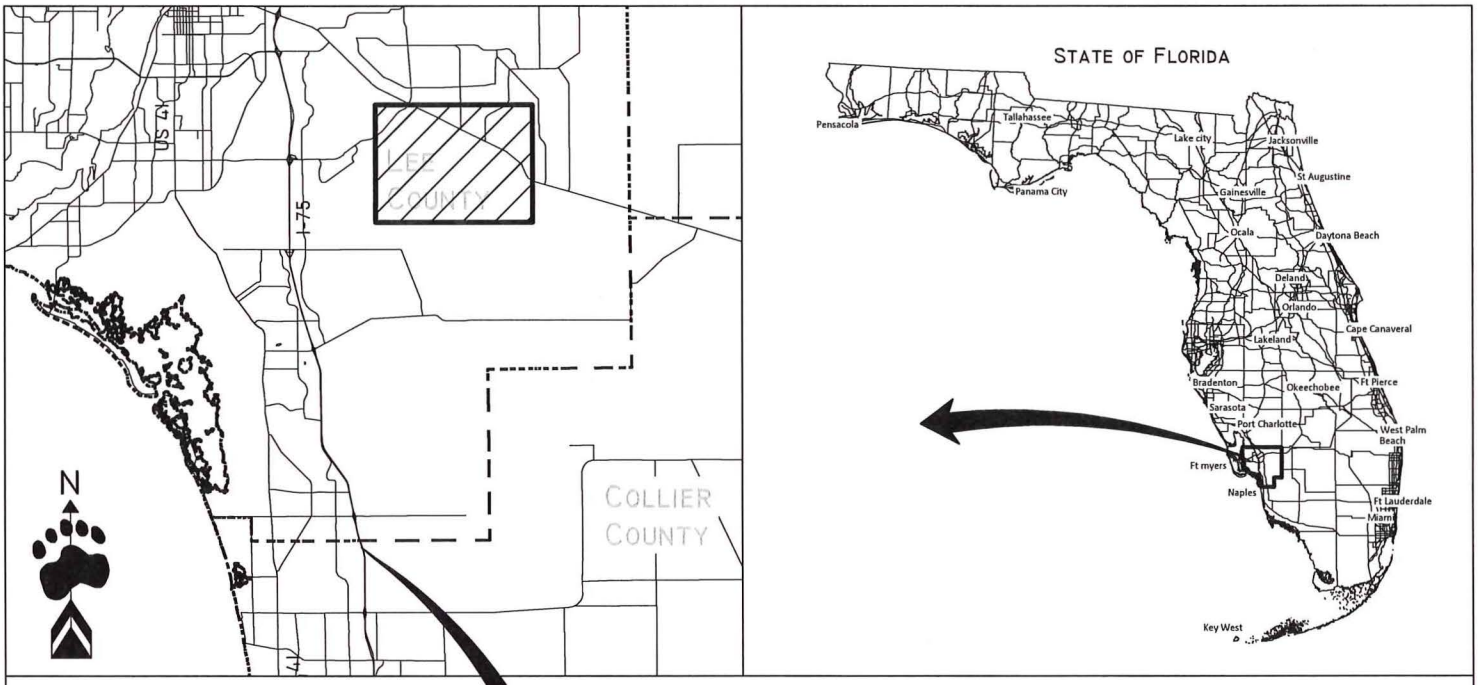
The list of exotic and nuisance plant species are defined under the Lee County, Land Development Code (LDC), Section 10-420(h). These plants will be killed in a manner consistent with the LDC, Section 10-415(b)(4), following current approved exotic and nuisance plant removal practices. Exotic maintenance will be conducted in perpetuity to ensure that the preserve area are free of exotic vegetation (as currently defined by the EPPC) immediately following maintenance and that exotic and nuisance species will constitute no more than five percent of total combined cover. The proposed mitigation and monitoring work schedule can be seen in Table 1, below.

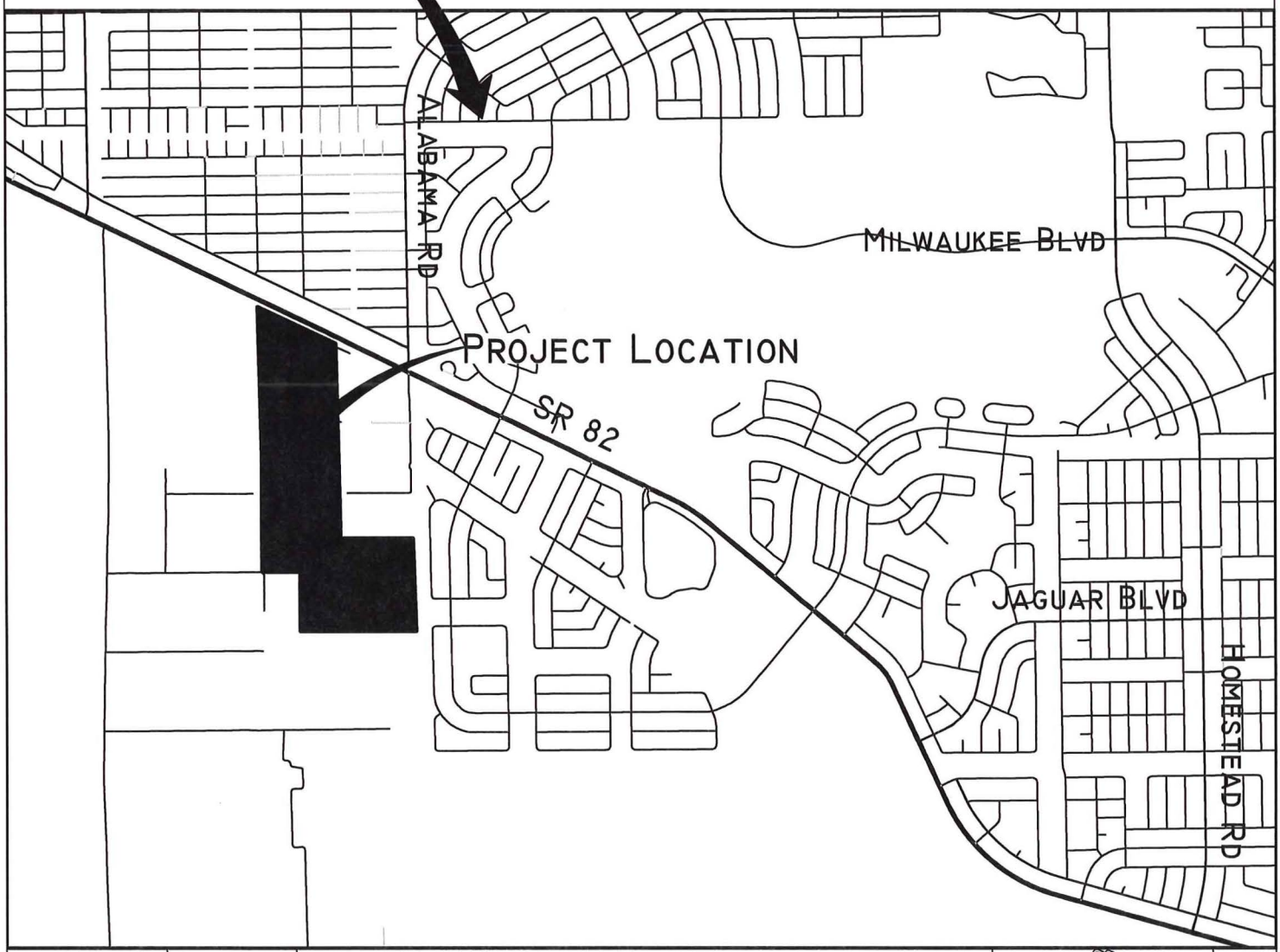
Table 1. Monitoring & Mitigation Work Schedule

Proposed Completion Date	Activity Proposed
September 2027	Baseline Upland Monitoring Report
November 2027	Exotic Vegetation Removal
December 2027	Submit Time-Zero Annual Upland Monitoring Report
November 2028	Exotic Vegetation Removal
December 2028	Submit First Annual Upland Monitoring Report
November 2029	Exotic Vegetation Removal
December 2029	Submit Second Annual Upland Monitoring Report
November 2030	Exotic Vegetation Removal
December 2030	Submit Third Annual Upland Monitoring Report
November 2031	Exotic Vegetation Removal
December 2031	Submit Fourth Annual Upland Monitoring Report
November 2032	Exotic Vegetation Removal
December 2032	Submit Fifth Annual Upland Monitoring Report

Exhibit A

Project Location Map





DRAWN BY:	DATE:	CATEGORY
BWS	1/26/26	LOCATION
JOB NUMBER		SCALE:
		NTS
S/T/R		COUNTY
13/45S/26E		LEE

Freeman SR 82 Property

Location Map

BEARPAWS
ENVIRONMENTAL CONSULTING
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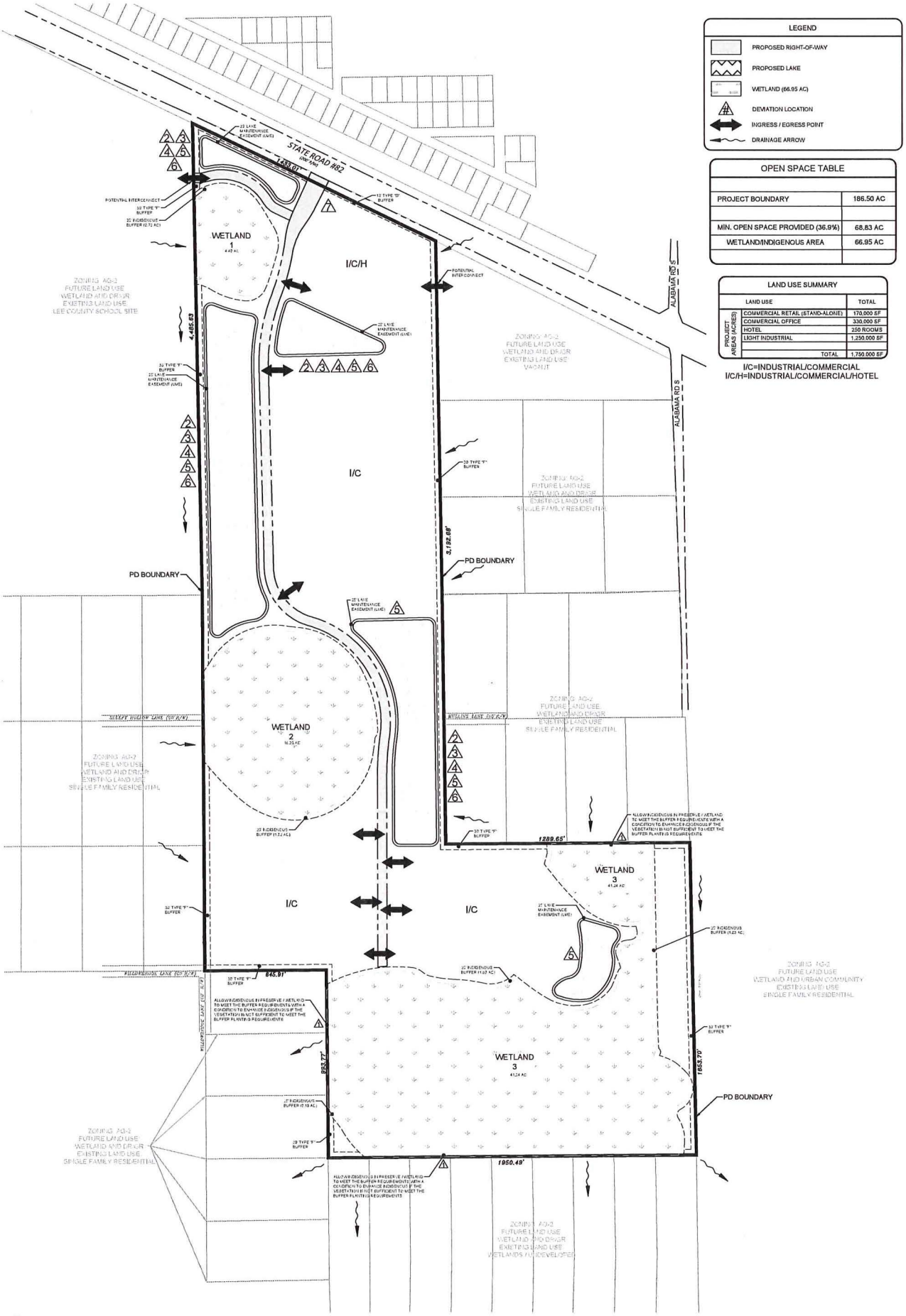
(239) 340-0678 BEARPAWS.ENV.CONSULTING@GMAIL.COM

PAGE

EXHIBIT

Exhibit B

Master Site Plan



RVi

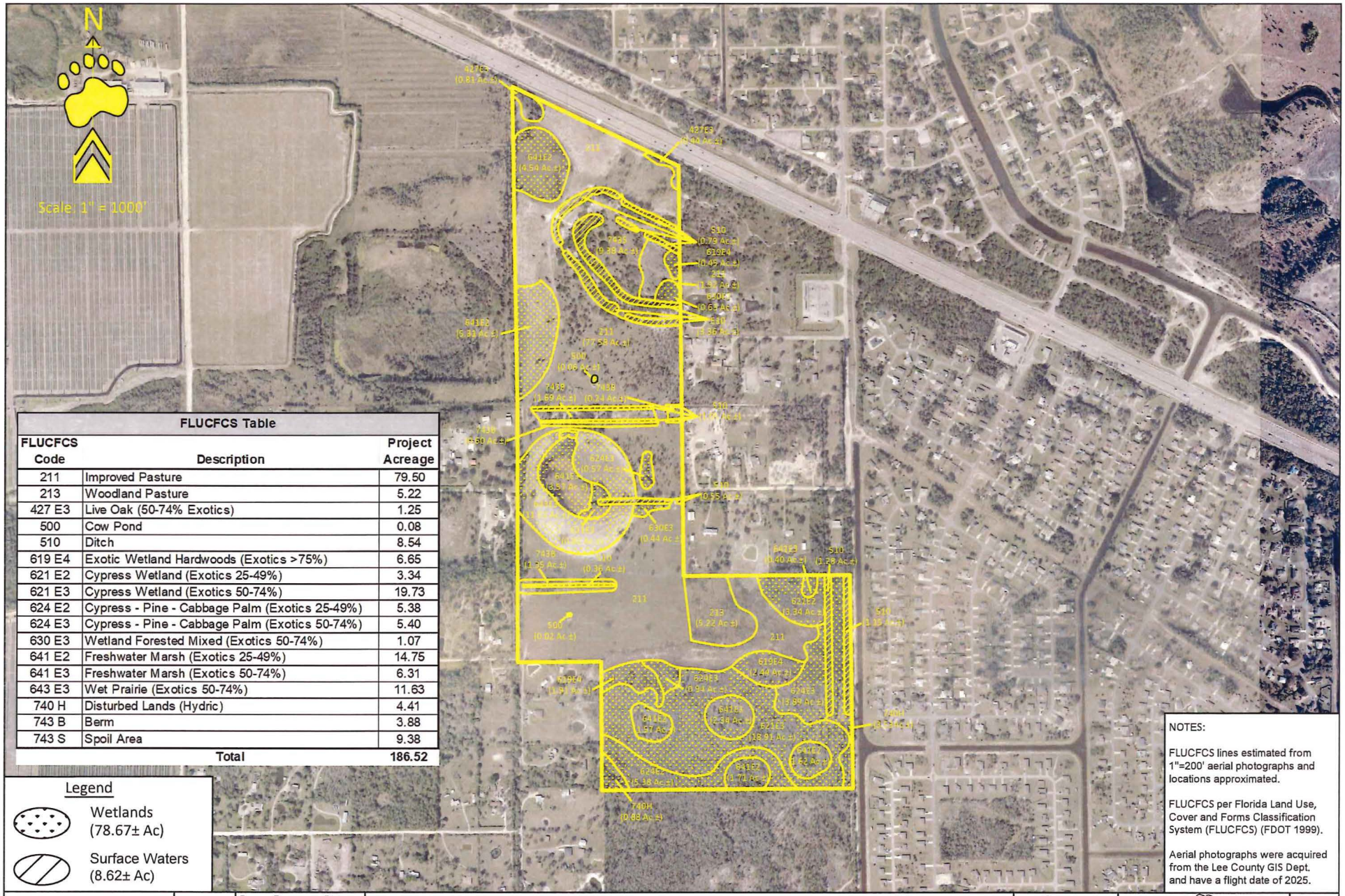
SR82 FREEMAN MPD • MASTER CONCEPT PLAN

LEE COUNTY, FLORIDA
2025-10-10
24006461
Brian Scott Holdings, Inc. and BJ Holdings of Fort Myers, LLC

0 100' 200' 400'
SCALE: 1" = 200'-0"

Exhibit C

Aerial FLUCFCS Map



FLUCFCS Table		
FLUCFCS Code	Description	Project Acreage
211	Improved Pasture	79.50
213	Woodland Pasture	5.22
427 E3	Live Oak (50-74% Exotics)	1.25
500	Cow Pond	0.08
510	Ditch	8.54
619 E4	Exotic Wetland Hardwoods (Exotics >75%)	6.65
621 E2	Cypress Wetland (Exotics 25-49%)	3.34
621 E3	Cypress Wetland (Exotics 50-74%)	19.73
624 E2	Cypress - Pine - Cabbage Palm (Exotics 25-49%)	5.38
624 E3	Cypress - Pine - Cabbage Palm (Exotics 50-74%)	5.40
630 E3	Wetland Forested Mixed (Exotics 50-74%)	1.07
641 E2	Freshwater Marsh (Exotics 25-49%)	14.75
641 E3	Freshwater Marsh (Exotics 50-74%)	6.31
643 E3	Wet Prairie (Exotics 50-74%)	11.63
740 H	Disturbed Lands (Hydric)	4.41
743 B	Berm	3.88
743 S	Spoil Area	9.38
	Total	186.52

Legend

Wetlands (78.67± Ac)

Surface Waters (8.62± Ac)

NOTES:

FLUCFCS lines estimated from 1"=200' aerial photographs and locations approximated.

FLUCFCS per Florida Land Use, Cover and Forms Classification System (FLUCFCS) (FDOT 1999).

Aerial photographs were acquired from the Lee County GIS Dept. and have a flight date of 2025.

Revisions	Date:

Drawn By: BWS Date: 1/26/26

Job Number

S/T/R 13/45S/26E

Freeman SR 82 Property

Aerial FLUCFCS Map

Category: FLUCFCS

Scale: 1" = 1000'

County: Lee

BEARPAWS ENVIRONMENTAL CONSULTING
1599 Covington Circle East, Fort Myers, FL 33919
(239) 340-0678 bearpaws.env.consulting@gmail.com

Page -

Exhibit -

SR 82 FREEMAN CPA

Exhibit M14- Historic Resources Impact Analysis

I. REQUEST

The 186.5 +/- acre subject property is located at 1770 and 17800 State Road 82, and identified as STRAP No 13-45-26-00-00001.002A, 13-45-26-00-00001.0020, 24-45-26-00-00001.2000, 24-45-26-00-00001.3000, and 24-45-26-00-00001.8000, in unincorporated Lee County, Florida. Brian Freeman of Brian Scott Holdings, Inc. and BJ Holdings of Fort Myers, LLC ("Applicant") is proposing to:

- Future Land Use Map 1-A to move the property from the Wetlands and DR/GR Future Land Use Category (FLUC) to the Tradeport FLUC.
- The Sewer and Water Franchise Area Maps 4-A and 4-B to designate the Property in the Lee County Utilities (LCU) franchise service area.
- Table 1(b) to allocate acreage to the Tradeport future land use category in Southeast Lee County Planning Community.

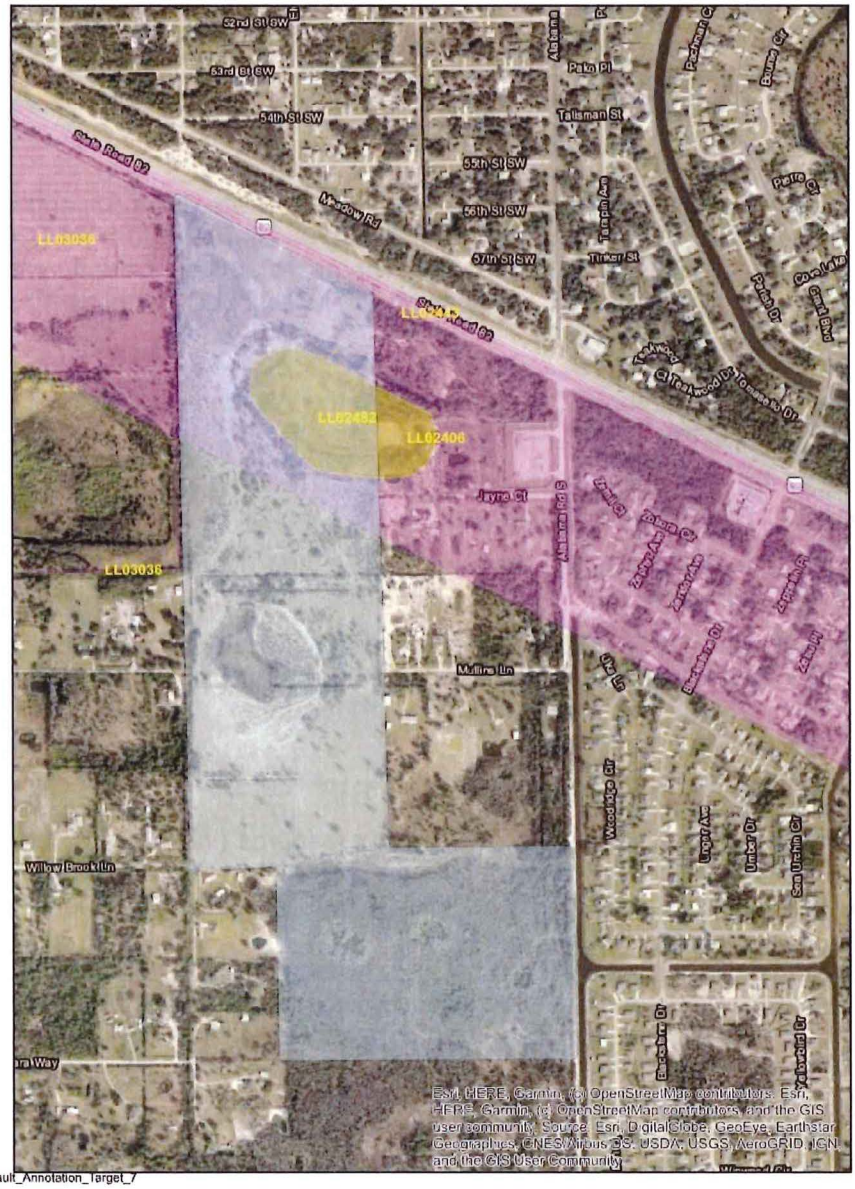
Additionally, a companion zoning action to rezone the property from AG-2 to Mixed-Use Planned Development (MPD). The development program is for 1,750,000 sf of commercial, office, hotel, and light industrial uses.

II. HISTORIC RESOURCES IMPACT ANALYSIS

The property does contain one previously recorded historic resource (including structure, districts, and/or archaeologically sensitive areas). An email and map have been secured from the Division of Historical Resources - Florida Department of State which is included in this document.

The Ground and Surface Water Resources Report also provides a historic summary. This recorded feature is located in the northeast portion of a site and occupies about 15 acres. This triangular raised berm was constructed for World War II military training exercises which significantly altered the natural hydrology by disrupting the predevelopment surface-water flow patterns. Similar historic military features are common along the south side of State Highway 82.

Based on the Florida Land Use and Cover Classification System (FLUCCS) mapping from the South Florida Water Management District (SFWMD), approximately 92.5 acres (roughly 50 percent) of the site are classified as improved pasture. Historic aerial photography indicates that much of this area was intensively drained to support past agricultural activities both on and adjacent to the site. Numerous ditches and swales traverse the central and southern portions of the property, reflecting extensive hydrologic modification. These features also facilitated the drainage of historic wetlands, including a large circular wetland in the south-central portion that has been bisected by an east–west drainage ditch, contributing to the site's highly disturbed condition. Remaining natural communities identified by the SFWMD include pine and oak forest, palmetto prairie, hydric pine, wet prairie, and cypress heads. Despite these significant alterations, the property lies within Lee County's Density Reduction/Groundwater Resource (DR/GR) area.



Legend

- Buffer_of_Default_Annotation_Target_7
- FloridaSites
- HistoricalBridges
- HistoricalCemeteries
- ResourceGroups
- FloridaStructures

Florida Master Site File

AR=1
SS=0
CM=0
RG=3
BR=0
Total=4

Created: 7/31/2025

Cultural Resource Roster

SiteID	Type	Site Name	Address	Additional Info	SHPO Eval	NR Status
LL02406	RG	Buckingham Gunnery Range	Lehigh Acres	Designed Historic Landscape - 5 Contrib Resources	Eligible	
LL02443	RG	SR 82	Fort Myers, Immokalee	Linear Resource	Not Eligible	
LL02482	AR	Gunnery Range #7	Lehigh Acres		Eligible	
LL03036	RG	Unnamed Drainage Canal 1	Fort Myers	Linear Resource - 1 Contrib Resources	Not Eligible	

TR TRANSPORTATION CONSULTANTS, INC

2726 OAK RIDGE COURT, SUITE 503
FORT MYERS, FL 33901-9356
OFFICE 239.278.3090
FAX 239.278.1906

TRAFFIC ENGINEERING
TRANSPORTATION PLANNING
SIGNAL SYSTEMS/DESIGN

TRAFFIC IMPACT STATEMENT

FOR

SR 82 FREEMAN MPD COMPREHENSIVE PLAN AMENDMENT & REZONING

(PROJECT NO. F2505.03)

PREPARED BY:
TR Transportation Consultants, Inc.
Certificate of Authorization Number: 27003
2726 Oak Ridge Court, Suite 503
Fort Myers, Florida 33901-9356
(239) 278-3090

REVISED:
January 16, 2025

TR TRANSPORTATION CONSULTANTS, INC

CONTENTS

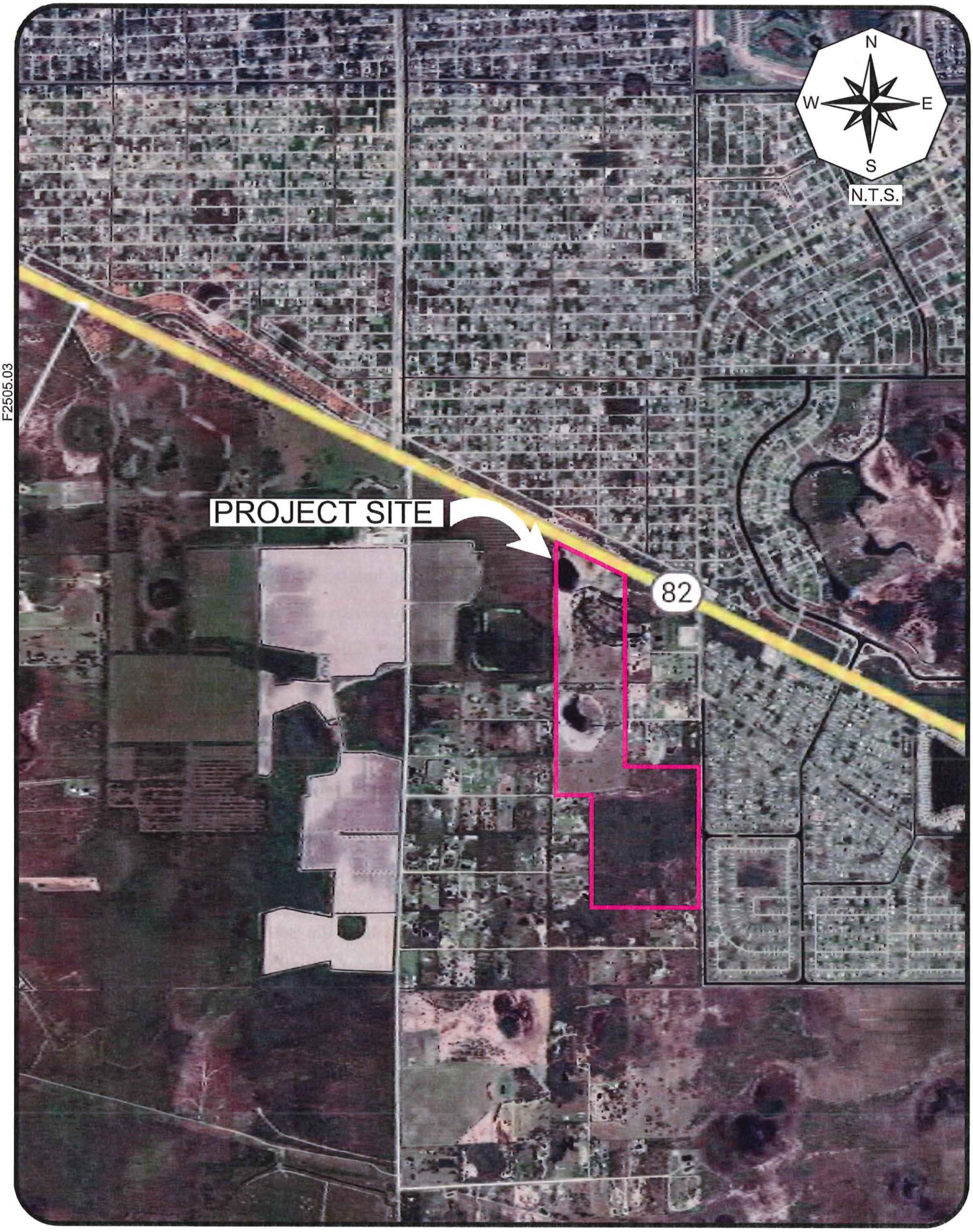
TR TRANSPORTATION CONSULTANTS, INC

I. INTRODUCTION

TR Transportation Consultants, Inc. has conducted a traffic impact statement to fulfill requirements set forth by the Lee County Department of Community Development for projects seeking an amendment to the Comprehensive Land Use Plan and re-zoning approval. The subject site is located on the south side of SR 82 between Sunshine Boulevard and Alabama Road in Lee County, Florida. **Figure 1** illustrates the approximate location of the subject site.

The analysis in this report will determine the impacts of change in land use on the approximately 186.5-acre subject site from Density Reduction/Ground Water Resource (DR/GR) & Wetlands to Tradeport as well as a zoning amendment to permit the development of up to 1,750,000 retail, commercial, office, hotel and light industrial uses. The transportation related impacts of the proposed Comprehensive Plan amendment will be assessed based on evaluation of the long range impact (20-year horizon) and short range impact (5-year horizon) the proposed amendment would have on the existing and future roadway infrastructure. The transportation related impacts of the proposed rezoning will be evaluated based on the estimated build-out year of the project and the impacts the proposed rezoning will have on the surrounding roadway infrastructure. Access to the subject site will be provided to S.R. 82 via a single connection.

This report examines the impact of the development on the surrounding roadways. Trip generation and assignments to the various roadways within the study area will be completed and analysis conducted to determine the impacts of the development on the surrounding roadways.



F2505.03

PROJECT LOCATION MAP
SR 82 FREEMAN MPD

Figure 1

II. EXISTING CONDITIONS

The subject site is currently vacant. This subject site is bordered by land currently being developed by the Lee County School District for multiple future school sites to the west, and AG-2 land to the south and east. SR 82 borders the site to the north

SR 82 (Immokalee Road) is a 6-lane divided roadway adjacent to the subject. S.R. 82 has a posted speed limit of 55 mph and an adopted Corridor Access Management Plan (CAMP) with minimum access spacing for connections identified at 1,320 feet. S.R. 82 is under the jurisdiction of the Florida Department of Transportation (FDOT) and has Context Classification of C3R.

Alabama Road is a two-lane undivided arterial to the north of SR 82. Alabama Road to the north of SR 82 has a posted speed limit of 45 mph and is under the jurisdiction of the Lee County Department of Transportation.

Sunshine Boulevard is a two-lane undivided arterial to the north of SR 82. Sunshine Boulevard to the north of SR 82 has a posted speed limit of 45 mph and is under the jurisdiction of the Lee County Department of Transportation.

III. PROPOSED COMPREHENSIVE PLAN AMENDMENT

The proposed Map Amendment would change the future land use designation on the approximately 186.5-acre subject site from Density Reduction/Ground Water Resource (DR/GR) & Wetlands to Tradeport. Based on the Lee Plan, the existing future land use categories allow for a maximum development of 1 dwelling unit per 10 acres of property. This would allow the subject site to currently be developed with just 14 dwelling unit, which is negligible in terms of trip generation. Therefore, no comparison in terms of trip generation was completed between the approved future land use categories and the proposed land use change.

Table 1 summarizes the use that is requested as part of the proposed land use change. These uses and intensities match those that are requested in the companion rezoning application. For the proposed future land use change, the subject site was assumed to be developed with up to 1,750,000 square feet of commercial and industrial uses. As previously mentioned, under the existing future land use categories only 14 dwelling unit would be allowed to be developed on the subject site, which is negligible in terms of trip generation.

Table 1
Land Use
SR 82 Freeman MPD

Proposed Land Use Category	Intensity
Tradeport	170,000 Sq. Ft. Retail 330,000 Sq. Ft. Office (75,000 could be Medical Office) 250 Hotel Rooms 1,250,000 Sq. Ft. Light Industrial Total – 1,750,000 Sq. Ft.

Hotel use does not count against the total floor area

IV. TRIP GENERATION

The trip generation for the proposed development was determined by referencing the Institute of Transportation Engineer's (ITE) report, titled ***Trip Generation Manual***, 12th Edition. Land Use Code 820 (Shopping Center) was utilized for the trip generation purposes of the proposed commercial retail uses on site, Land Use Code 710 (General Office) was used for the general office uses and Land Use Code 720 (Medical-Dental Office Building was utilized for the medical office uses). Land Use Code 310 (Hotel) was utilized for the hotel use and Land Use Code 130 (Industrial Park) was utilized for the industrial uses. The equations utilized from these land use are included in the Appendix of this report for reference. **Table 2** outlines the anticipated weekday AM and PM peak hour trip generation of the development as currently proposed. The daily trip generation is also indicated in this table. Table 2 also incorporated reduction in trips due to "pass-

by" traffic associated with the retail uses. Consistent with limits permitted by Lee County, the "pass-by" rate for the Land Use Code 820 was limited to 30%.

Table 2
Comprehensive Plan Amendment & Rezoning
Trip Generation Based on Proposed Use
SR 82 Freeman MPD

Land Use	Weekday AM Peak Hour			Weekday PM Peak Hour			Daily (2-way)
	In	Out	Total	In	Out	Total	
Retail (170,000 Sq. Ft.)	147	90	237	367	383	750	6,186
General Office (255,000 Sq. Ft.)	269	37	306	45	239	284	1,784
Medical Office (75,000 Sq. Ft.)	144	40	184	82	190	272	2,970
Hotel (250 Rooms)	54	50	104	80	77	157	1,460
Industrial Park (1,250,000 Sq. Ft.)	232	69	301	88	226	314	3,358
Less LUC 820 Pass-By	-35	-36	-71	-112	-113	-225	-1,856
New Trips	**811**	**250**	**1,061**	**550**	**1,002**	**1,552**	**13,902**

V. COMPREHENSIVE PLAN AMENDMENT ANALYSIS

As mentioned previously, the proposed Map Amendment would change the future land use designation on the approximate 186.5-acre subject site from Density Reduction/Ground Water Resource (DR/GR) & Wetlands to Tradeport. The transportation related impacts of the proposed Comprehensive Plan Amendment were evaluated pursuant to the criteria in the application document. This included an evaluation of the long range impact (20-year horizon) and short range impact (5-year horizon) the proposed amendment would have on the existing and future roadway infrastructure.

Long Range Impacts (20-year horizon)

The Lee County Metropolitan Planning Organization's (MPO) 2045 Long Range Transportation Plan was reviewed to determine if any future roadway improvements were planned in the vicinity of the subject site. Based on the review, roadway improvements within the vicinity of the subject site shown on the 2045 Financially Feasible Plan were the following roadway capacity improvements:

- **Widening of Sunshine Boulevard to a four-lane facility from SR 82 to Lee Boulevard**
- **Widening of Homestead Road to a four-lane facility from SR 82 to Sunrise Boulevard**
- **Extension of Alico Road (new four-lane facility) from Green Meadow Road to SR 82.**
- **Extension of 40th Street SW from it's eastern terminus to Alabama Road.**

There are no other improvements within the vicinity of the subject site on the Long Range Transportation Plan.

The Lee County Metropolitan Planning Organization's (MPO) Long Range Transportation Plan along with the FDOT District One travel model were also reviewed in order to determine the impacts the amendment would have on the surrounding area. The base 2045 loaded network volumes were determined for the roadways within the study area. The PM peak hour trips to be generated from the project as shown in Table 2 were then added to the projected 2045 background volumes. The Level of Service for those roadways were then evaluated. The Level of Service threshold volumes for County maintained roadways were obtained from ***Lee County's Generalized Peak Hour Directional Service Volumes*** table. The Level of Service threshold volumes for State maintained roadways were derived based on the ***Florida Department of Transportation Multimodal Quality Level of Service Peak Hour Directional Volumes***. Both documents are attached to the Appendix of this report for reference.

The results of the analysis indicate that the proposed change to the land use category on the subject parcel will not cause any roadway link to fall below the recommended minimum acceptable Level of Service thresholds as recommended in Policy 37.1.1 of the Lee County Comprehensive Plan. S.R. 82 from Sunshine Boulevard/Alico Road extension east to Jaguar Boulevard and the Alico Road Extension south of S.R. 82 are shown to operate below the adopted LOS standards in 2045 in the Background traffic conditions and not as a result of adding the number of additional trips from the project. Therefore, no changes to the adopted Long Range Transportation Plan are required as result of the proposed land use change. Attached **Table 1A** and **Table 2A** reflect the Level of Service analysis based on the 2045 conditions.

Short Range Impacts (5-year horizon)

The 2024/2025-2028/2029 Lee County Transportation Capital Improvement Plan and the 2026-2030 Florida Department of Transportation Adopted Work Program were reviewed to determine the short term impacts the proposed land use change would have on the surrounding roadways. Based on the review, the only project funded for construction in the Study Area is the extension of Alico Road (initially being constructed as a new two-lane facility with future expansion to a four-lane facility) from Green Meadow Road to SR 82. FDOT is also constructing a traffic signal at the intersection of S.R. 82 and Alabama Road.

Table 3A and **Table 4A** attached to this report indicate the projected 5-year planning Level of Service on the area roadways based on the uses that would be permitted under the proposed land use change. The existing peak hour, peak season, peak direction traffic volumes on the various roadway links maintained by Lee County were obtained from the most recent Lee County ***Public Facilities Level of Service and Concurrency Report.*** Due to lack of traffic data in the County's report for Parkdale Boulevard and Jaguar Boulevard, traffic data from recent turning movement counts at these intersections were utilized to determine the weekday P.M. peak hour direction traffic volumes for these two roadways. The projected 2030 volumes for the Alico Road extension were reduced from the estimated 2045 volumes as reported in the FSUTMS model files.

The existing peak hour, peak season, peak direction traffic volumes were then factored by the appropriate annual growth rates in order to obtain the 2030 background traffic conditions on the area roadway network. The growth rates for each roadway were calculated based on historical traffic data obtained from the FDOT's ***Florida Traffic Online*** resource by utilizing the FDOT Traffic Trends spreadsheet to compute the growth rate. A minimum AGR of 2% compounded annually was assumed for those roadways where historical data was unavailable or data indicated less than a 2% AGR. Based on the projected traffic distribution, the roadway link data was analyzed for the year 2030 without the proposed amendment and year 2030 with the proposed amendment. Traffic data obtained from the aforementioned Lee County and FDOT resources is attached to the Appendix of this report for reference.

The results of the analysis indicate that the addition of the trips as a result of the proposed amendment to the projected 2030 volumes will cause S.R. 82 to operate below the minimum Level of Service threshold from the site access to the west of Sunshine Boulevard. 23rd Street Southwest west of Sunshine Boulevard was shown to operate below the adopted LOS standards in 2030 in the Background traffic conditions and not as a result of adding the number of additional trips from the project. All remaining analyzed roadways were shown operate within their adopted minimum Level of Service standards. Therefore, no modifications will be necessary to the Lee County or FDOT short term capital improvement programs.

On the Metropolitan Planning Organizations (MPO) Long Range Transportation Plan update for 2050, the widening of S.R. 82 to a 6-lane facility is identified from Alabama Road to the Collier County Line. Another project on the 2050 Plan is the construction of Kingston Parkway, being constructed as part of the Kingston Development in eastern Lee County that will construct a new north/south roadway connecting S.R. 82 with Corkscrew Road. This roadway will be a 4-lane divide roadway and give drivers in eastern Lehigh Acres another option to access the Corkscrew Road and I-75 corridor without having to use S.R. 82 and the Alico Road extension.

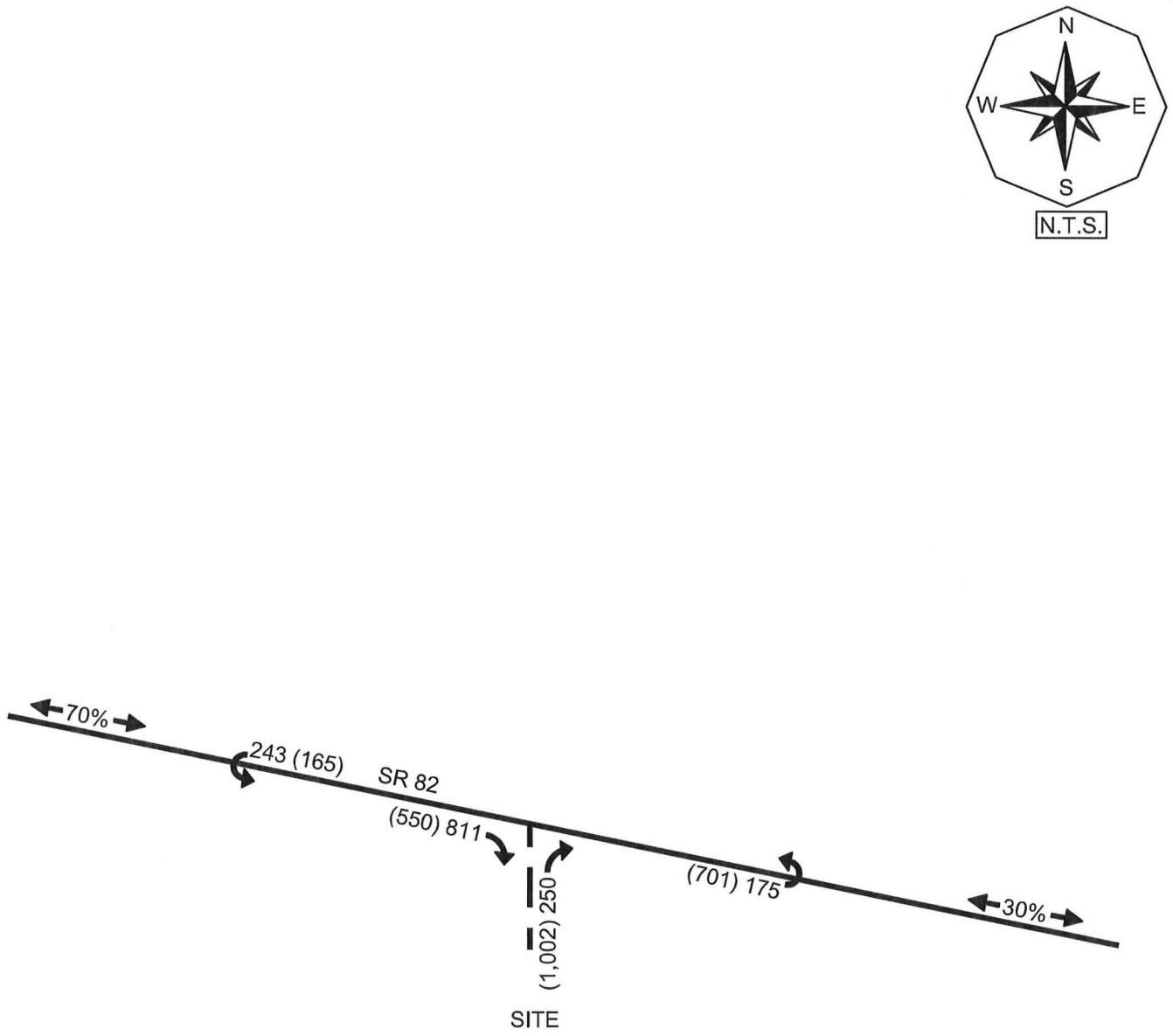
VI. ZONING ANALYSIS

An analysis was also completed to support the rezoning on the approximately 186.5-acre subject site from Agricultural (AG-2) to Mixed Use Planned Development (MPD) to permit the development of up to 1,750,000 commercial retail and industrial uses. The trips the proposed development is anticipated to generate, as shown in the Table 2, were assigned to the surrounding roadway network. **Figure 2** illustrates the resulting assignment of all project related trips to the site access drive intersection and adjacent U-turn locations along S.R. 82. A Pre-Application meeting was held with the Florida Department of Transportation to discuss access to the subject parcel. Due to the limited amount of roadway frontage the subject property has along S.R. 82 combined with the access management restrictions adopted in the CAMP plan, FDOT will only permit a right-in/right-out access to this site.

Despite there being several private roadway easements that touch the property near the south end of the project, these easements all contain private, unpaved roadways that in no way could accommodate any type of commercial or industrial traffic and are not considered as a viable option in provide any type of access to this property. In addition, these private roadways only lead directly back to SR 82.

In order to determine which roadway segments surrounding the site will be significantly impacted as outlined in the Lee County Traffic Impact Statement Guidelines, the same Level of Service tables utilized in the Short Terms Level of Service analysis for the Comprehensive Plan review were utilized, assuming a build-out year of 2030. **Table 3A**, contained in the Appendix, illustrates the Level of Service thresholds for those roadway segments in the study area. This table indicates which roadway links will experience a significant impact as a result of the added development traffic. Significant impact is defined as any roadway projected to experience greater than 10% of the Peak Hour – Peak Direction Level of Service "C" volumes. The Level of Service threshold volumes for County maintained roadways were obtained from ***Lee County's Generalized Peak***

F2505.03/Sufficiency



LEGEND

← 000 WEEKDAY AM PEAK HOUR TRAFFIC

← (000) WEEKDAY PM PEAK HOUR TRAFFIC

TRIP DISTRIBUTION &
SITE TRAFFIC ASSIGNMENT
SR 82 FREEMAN MPD

Figure 2

Hour Directional Service Volumes table. The Level of Service threshold volumes for State maintained roadways were derived based on the ***Florida Department of Transportation Multimodal Quality Level of Service Peak Hour Directional Volumes.*** Based on the information contained within Table 3A, the development will have significant impact on S.R. 82 from west of Sunshine Boulevard to Jaguar Boulevard, both Sunshine Boulevard and Alabama Road north of S.R. 82, and Parkdale Boulevard north of S.R. 82.

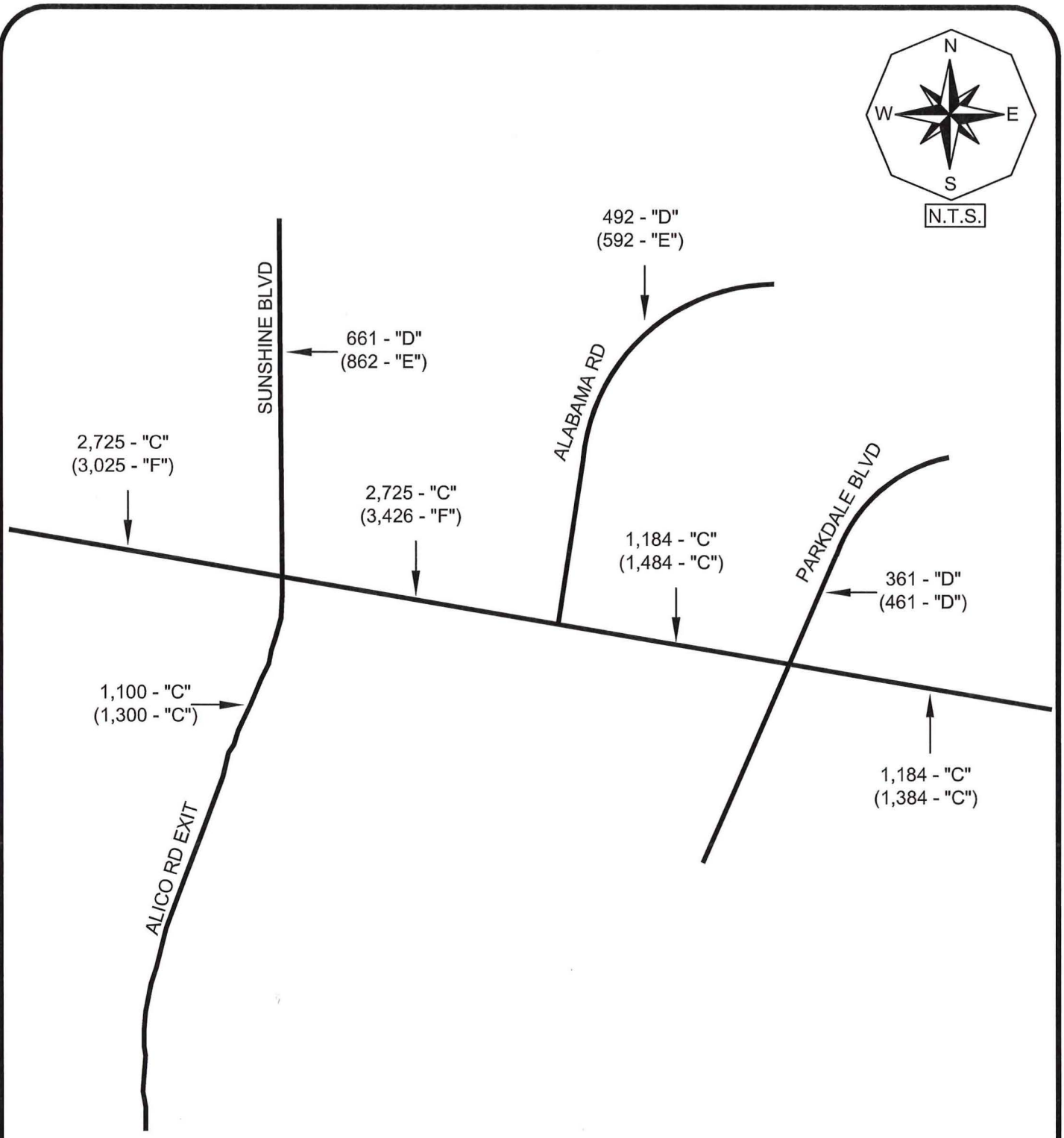
Level of Service Analysis

The future Level of Service analysis was based on projected build-out year of the project, or year 2030. Based on this horizon year, a growth rate was applied to the existing traffic conditions for all roadway links in the study area. Based on the project distribution illustrated on Table 3A, the link data was analyzed for the year 2030 without the development and year 2030 with the development.

Table 4A in the Appendix of the report indicates the methodology utilized to obtain the year 2030 background and build-out traffic volumes. The existing peak hour, peak season, peak direction traffic volumes on the roadway links maintained by the Lee County were obtained from the most recent Lee County ***Public Facilities Level of Service and Concurrency Report.*** The existing peak hour, peak season, peak direction traffic volumes were then factored by the appropriate annual growth rates in order to obtain the 2030 background traffic conditions on the area roadway network.

Figure 3 indicates the year 2030 peak hour – peak direction traffic volumes and Level of Service for the various roadway links within the study area. Noted on Figure 3 is the peak hour – peak direction volume and Level of Service of each link should no development occur on the subject site and the peak hour – peak direction volume and Level of Service for the weekday A.M. and P.M. peak hours with the development traffic added to the roadways. This figure is derived from Table 6A contained in the Appendix.

F2505.03/Sufficiency



LEGEND

XXX - "C" 2030 BACKGROUND TRAFFIC AND LEVEL OF SERVICE DESIGNATION

(XXX -"C") 2030 BACKGROUND TRAFFIC PLUS PM PEAK PROJECT TRAFFIC AND LEVEL OF SERVICE DESIGNATION

2030 LEVEL OF SERVICE ANALYSIS
SR 82 FREEMAN MPD

Figure 3

As previously indicated in the Short-Term analysis, the addition of the trips as a result of the proposed rezoning will cause S.R. 82 to operate below the minimum Level of Service threshold from the site access to the west of Sunshine Boulevard. 23rd Street Southwest west of Sunshine Boulevard was shown to operate below the adopted LOS standards in 2030 in the Background traffic conditions and not as a result of adding the number of additional trips from the project. All remaining analyzed roadways were shown operate within their adopted minimum Level of Service standards.

Intersection Analysis

Intersection analysis was performed at the proposed site access drive on SR 82. The analysis was based on the projected 2030 weekday A.M. and P.M. peak hour traffic conditions with the project traffic conditions. The existing traffic volumes on SR 82 were determined by referencing data from the FDOT ***Traffic Data*** online resource.

The through traffic volumes were taken from the volumes identified in Table 4A for SR 82 adjacent to the site. The turning volumes projected to be added to the intersection as illustrated on Figure 2 were then added to the 2030 background volumes to estimate the future 2030 traffic volumes with the project.

The results of the intersection analysis at the SR 82 and the site access drive intersection indicate the outbound movement will experience considerable delay during the weekday PM peak hour. Mitigation for this intersection will be developed during the FDOT permitting process. The U-turn locations operate with a v/c ratio of less than 1.0 with the exception of the U-turn at the eastern access during the weekday PM peak hour. Again, mitigation for this will be developed during the FDOT Access Permit application, which is when more specific project uses/intensities will be known. At this time the intersection analysis was completed based on the worst-case development scenario on the subject property.

VII. CONCLUSION

The proposed Comprehensive Land Use Amendment and re-zoning application is for the property located on the south side of SR 82 between Sunshine Boulevard and Alabama Road in Lee County, Florida. Based upon the roadway link Level of Service analysis conducted as a part of this report for both the Comprehensive Plan amendment and rezoning request, the development of the subject site meets the requirements set forth by the Lee County Comprehensive Plan and Land Development Code. Some of the roadways impacted by this project are shown to operate below their Level of Service standard in 2030 based on the Zoning analysis. The Lee County Long Range Transportation Plan, the currently adopted 2045 Plan and the soon to be adopted 2050 Plan, includes improvements in this area of Lee County that will provide additional roadway capacity and travel options to the residents and businesses of eastern Lehigh Acres. The Development will also pay road impact fees as part of the off-site mitigation.

The results of the intersection analysis at the SR 82 and the site access drive intersection indicate some movements will experience considerable delay during the weekday PM peak hour. Mitigation for these intersections will be developed during the FDOT permitting process, which could include a signalized R-cut intersection as an alternative intersection treatment to accommodate the significant amount of turning movements and reduce the travel delays along S.R. 82.

Turn lane improvements at the site access drive intersections will be evaluated at the time the project seeks a driveway permit from FDOT.

APPENDIX

TABLES 1A & 2A

2045 LOS ANALYSIS

TABLE 1A
LEVEL OF SERVICE THRESHOLDS
2045 LONG RANGE TRANSPORTATION ANALYSIS - SR 82 FREEMAN MPD

Revised 1-16-2026

		2045 E + C NETWORK LANES		GENERALIZED SERVICE VOLUMES				
				LOS A	LOS B	LOS C	LOS D	LOS E
ROADWAY	**ROADWAY SEGMENT**	**# Lanes**	**Roadway Designation**	**VOLUME**	**VOLUME**	**VOLUME**	**VOLUME**	**VOLUME**
SR 82	W. of Sunshine Blvd	6LD	Arterial - C3R	0	0	2,750	2,865	2,865
	W. of Alabama Rd	6LD	Arterial - C3R	0	0	2,750	2,865	2,865
	W. of Blackstone Dr	4LD	Arterial - C3R	0	0	1,785	1,945	1,945
	W. of Parkdale Blvd	4LD	Arterial - C3R	0	0	1,785	1,945	1,945
	W. of Jaguar Blvd	4LD	Arterial - C3R	0	0	1,785	1,945	1,945
	W. of Homestead Rd	4LD	Arterial - C3R	0	0	1,785	1,945	1,945
	E. of Homestead Rd	4LD	Arterial - C3R	0	0	1,785	1,945	1,945
Sunshine Blvd	N. of SR 82	4LD	Arterial	0	250	1,840	1,960	1,960
	N. of 23rd St SW	4LD	Arterial	0	250	1,840	1,960	1,960
23rd St SW	W. of Sunshine Blvd	2LU	Arterial	0	0	330	710	780
	E. of Sunshine Blvd	2LU	Arterial	0	0	330	710	780
Alabama Rd	N. of SR 82	2LU	Arterial	110	260	440	590	990
	N. of Milwaukee Blvd	2LU	Arterial	110	260	440	590	990
Alico Rd Extenstion	S. of SR 82	4LD	Controlled Access Facility	0	270	1,970	2,100	2,100
Parkdale Blvd	N. of SR 82	2LU	Collector	0	0	310	660	740
Jaguar Blvd	N. of SR 82	2LU	Collector	0	0	310	660	740
	E. of Homestead Rd	2LU	Collector	0	0	310	660	740
Milwaukee Blvd	E. of Alabama Rd	2LU	Collector	0	0	310	660	740
	E. of Homestead Rd	2LU	Collector	0	0	310	660	740

☐ - Denotes the LOS Standard for each roadway segment

* Level of Service Thresholds for Lee County roadways were taken from the Link Specifice Peak Hour Directional Service Volume Tables
* Level of Service Thresholds for State mantained roadways were taken from FDOT's Multimodal Q/LOS Handbook based on Context Classification

TABLE 2A
2045 ROADWAY LINK LEVEL OF SERVICE CALCULATIONS
SR 82 FREEMAN MPD

Revised 1-16-2026

TOTAL PM PEAK HOUR PROJECT TRAFFIC = 1552 VPH IN= 550 OUT= 1002

ROADWAY	ROADWAY SEGMENT	2045 FSUTMS AADT	COUNTY PCS / FDOT SITE #	AADT BACKGROUND TRAFFIC	K-100 FACTOR	100TH HIGHEST HOUR PK DIR 2-WAY VOLUME	D FACTOR	PM PK HR PEAK DIRECTION	2045 PK HR PEAK DIRECTION TRAFFIC VOLUMES & LOS VOLUME [1]	LOS	PROJECT TRAFFIC DIST.	PK DIR PM PROJ TRAFFIC	2045 BACKGROUND PLUS PROJ PEAK DIRECTION TRAFFIC VOLUMES & LOS VOLUME	LOS
SR 82	W. of Sunshine Blvd	48,847	126021	48,847	0.090	4,396	0.56	EAST	2,462	C	30%	301	2,763	D
	W. of Site Access	62,607	126021	62,607	0.090	5,635	0.56	EAST	3,156	F	70%	701	3,857	F
	W. of Alabama Rd	62,607	126021	62,607	0.090	5,635	0.56	EAST	3,156	F	30%	301	3,457	F
	W. of Blackstone Dr	53,634	120068	53,634	0.090	4,827	0.56	EAST	2,703	F	20%	200	2,903	F
	W. of Parkdale Blvd	45,827	120068	45,827	0.090	4,124	0.56	EAST	2,309	F	20%	200	2,509	F
	W. of Jaguar Blvd	32,111	120068	32,111	0.090	2,890	0.56	EAST	1,618	C	10%	100	1,718	C
Sunshine Blvd	N. of SR 82	29,145	124182	29,145	0.090	2,623	0.55	NORTH	1,443	C	20%	200	1,643	C
	N. of 23rd St SW	18,297	124182	18,297	0.090	1,647	0.55	NORTH	906	C	10%	100	1,006	C
23rd St SW	W. of Sunshine Blvd	8,785	124469	8,785	0.090	791	0.539	EAST	426	D	14%	140	566	D
	E. of Sunshine Blvd	14,825	124171	14,825	0.090	1,334	0.539	EAST	719	E	6%	60	779	E
Alabama Rd	N. of SR 82	14,640	124623	14,640	0.090	1,318	0.55	NORTH	725	E	10%	100	825	E
	N. of Milwaukee Blvd	28,251	124623	18,831	0.090	1,695	0.55	NORTH	932	E	5%	50	982	E
Alico Rd Extenstion	S. of SR 82	44,682	53	44,682	0.094	4,200	0.55	SOUTH	2,310	F	20%	200	2,510	F
Parkdale Blvd	N. of SR 82	9,177	120152	9,177	0.090	826	0.539	NORTH	445	D	10%	100	545	D
Jaguar Blvd	N. of SR 82	9,154	120152	9,154	0.090	824	0.55	NORTH	453	D	5%	50	503	D
Milwaukee Blvd	E. of Alabama Rd	3,272	126072	2,745	0.100	275	0.54	EAST	149	C	5%	50	199	C

1 The 2045 Pk Hr Pk Direction Traffic Volumes were calculated by adjusting the 2045 AADT volumes obtained from the adopted FSUTMS model by the appropriate K and D factors.

* The K-100 and D factors for County mantained roadways were obtained from Lee County Traffic Count Report.

Note: Due to lack of traffic data in the Lee County Traffic Count Report, the K-100 and D factors for Sunshine Blvd, 23rd Street SW, Alabama Rd, Jaguar Blv. Homestead Rd & Milwaukee Blvd were obtained from FDOT Florida Traffic Online.

Note: Due to lack of traffic data, the K-100 and D factors for Parkdale Blvd were assumed from FDOT's count station No. 120152 (Jaguar Blvd).

* The K-100 and D factors for FDOT mantained roadways were obtained from Florida Traffic Online resource.

TABLES 3A & 4A

5-YEAR LOS & ZONING ANALYSIS

TABLE 3A
LEVEL OF SERVICE THRESHOLDS
SR 82 FREEMAND MPD
5-YEAR ANALYSIS

Revised 1-16-2026

ROADWAY	ROADWAY SEGMENT	# LANES	ROADWAY DESIGNATION	GENERALIZED SERVICE VOLUMES LOS A VOLUME	LOS B VOLUME	LOS C VOLUME	LOS D VOLUME	LOS E VOLUME	PROJ IMPACT % OF ADOPTED LOS
SR 82	W. of Sunshine Blvd	6LD	Arterial - C3R	0	0	2,750	2,865	2,865	10.5%
	W. of Alabama Rd	6LD	Arterial - C3R	0	0	2,750	2,865	2,865	24.5%
	W. of Blackstone Dr	4LD	Arterial - C3R	0	0	1,785	1,945	1,945	15.5%
	W. of Parkdale Blvd	4LD	Arterial - C3R	0	0	1,785	1,945	1,945	10.3%
	W. of Jaguar Blvd	4LD	Arterial - C3R	0	0	1,785	1,945	1,945	10.3%
Sunshine Blvd	N. of SR 82	2LU	Arterial	150	310	500	700	1,010	28.6%
	N. of 23rd St SW	2LU	Arterial	150	310	500	700	1,010	14.3%
23rd St SW	W. of Sunshine Blvd	2LU	Arterial	0	0	330	710	780	19.8%
	E. of Sunshine Blvd	2LU	Arterial	0	0	330	710	780	8.5%
Alabama Rd	N. of SR 82	2LU	Arterial	110	260	440	590	990	17.0%
	N. of Milwaukee Blvd	2LU	Arterial	110	260	440	590	990	8.5%
Alico Rd Extenstion	S. of SR 82	4LD	Controlled Access Facility	0	270	1,970	2,100	2,100	9.5%
Parkdale Blvd	N. of SR 82	2LU	Collector	0	0	310	660	740	15.2%
Jaguar Blvd	N. of SR 82	2LU	Collector	0	0	310	660	740	7.6%
Milwaukee Blvd	E. of Alabama Rd	2LU	Collector	0	0	310	660	740	

- Denotes the LOS Standard for each roadway segment

* Level of Service Thresholds for Lee County roadways were taken from the Link Specifice Peak Hour Directional Service Volume Tables
* Level of Service Thresholds for State mantained roadways were taken from FDOT's Multimodal Q/LOS Handbook based on Context Classification

TABLE 4A
LEE COUNTY TRAFFIC COUNTS AND CALCULATIONS
SR 82 FREEMAND MPD

TOTAL PROJECT TRAFFIC AM = 1,061 VPH IN = 811 OUT= 250

TOTAL PROJECT TRAFFIC PM = 1,552 VPH IN= 550 OUT= 1,002

REVISED 1-16-2026

ROADWAY	ROADWAY SEGMENT	ANNUAL RATE	2023 PK SEASON PEAK DIR.[2]	2030 PK HR PK SEASON PEAK DIRECTION VOLUME	LOS	V/C RATIO	PERCENT PROJECT TRAFFIC	AM PROJ TRAFFIC	PM PROJ TRAFFIC	2030 BCKGRND + AM PROJ VOLUME	LOS	V/C RATIO	2030 BCKGRND + PM PROJ VOLUME	LOS	V/C RATIO
SR 82	W. of Sunshine Blvd	2.26%	2,330	2,849	D	0.99	30%	243	301	3,092	F	1.08	3,150	F	1.10
	W. of Alabama Rd	2.26%	2,330	2,849	D	0.99	70%	568	701	3,417	F	1.19	3,551	F	1.24
	W. of Blackstone Dr	2.41%	1,002	1,242	C	0.64	30%	243	301	1,485	C	0.76	1,542	C	0.79
	W. of Parkdale Blvd	2.41%	1,002	1,242	C	0.64	20%	162	200	1,404	C	0.72	1,442	C	0.74
	W. of Jaguar Blvd	2.41%	1,002	1,242	C	0.64	20%	162	200	1,404	C	0.72	1,442	C	0.74
Sunshine Blvd	N. of SR 82	2.83%	544	699	D	0.69	20%	162	200	862	E	0.85	900	E	0.89
	N. of 23rd St SW	2.83%	544	699	D	0.69	10%	81	100	780	E	0.77	800	E	0.79
23rd St SW	W. of Sunshine Blvd	2.00%	714	853	F	1.09	14%	114	140	967	F	1.24	994	F	1.27
	E. of Sunshine Blvd	2.00%	475	557	D	0.71	6%	49	60	605	D	0.78	617	D	0.79
Alabama Rd	N. of SR 82	2.00%	428	511	D	0.52	10%	81	100	593	E	0.60	612	E	0.62
	N. of Milwaukee Blvd	2.00%	428	511	D	0.52	5%	41	50	552	D	0.56	562	D	0.57
Alico Rd Extenstion	S. of SR 82	2.00%		1,100	C	0.52	20%	162	200	1,262	C	0.60	1,300	C	0.62
Parkdale Blvd	N. of SR 82	2.00%	314	375	D	0.51	10%	81	100	456	D	0.62	475	D	0.64
Jaguar Blvd	N. of SR 82	2.00%	242	289	C	0.39	5%	41	50	330	D	0.45	339	D	0.46
Milwaukee Blvd	E. of Alabama Rd	2.00%	171	204	C	0.28	5%	41	50	245	C	0.33	254	C	0.34

1 AGR for all roadways was calculated based the historical traffic data obtained from the FDOT Traffic Data Online and the FDOT Trends Spreadsheet

1 Due to lack of historical traffic data on Parkdale Blvd and Jaguar Blvd, a minimum annual growth rate of 2% compounded annually was assumed.

1 Current peak hour peak season peak direction traffic volume for Parkdale Boulevard & Jaguar Blvd. were obtained from the traffic counts conducted at SR 82 & Blackstone Drive/Parkdale & SR 82 @ Jaguarn Blvd. The traffic volumes from the counts were then adjusted to peak season conditions based on the PSCF obtained from Florida Traffic Online webpage.

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.

2 2030 peak hour peak season peak direction traffic volumes for Alico Road Extension was estimated by reducing the projeted 2045 FSUTMS volumes by 50% since Lee County is initially c

FDOT MULTIMODAL QUALITY/LEVEL OF SERVICE HANDBOOK PEAK HOUR DIRECTIONAL VOLUMES FOR SR 82

C3C & C3R

Motor Vehicle Arterial Generalized Service Volume Tables

(C3C-Suburban Commercial)

Peak Hour Directional

	B	C	D	E
1 Lane	*	760	1,070	**
2 Lane	*	1,520	1,810	**
3 Lane	*	2,360	2,680	**
4 Lane	*	3,170	3,180	**

Peak Hour Two-Way

	B	C	D	E
2 Lane	*	1,380	1,950	**
4 Lane	*	2,760	3,290	**
6 Lane	*	4,290	4,870	**
8 Lane	*	5,760	5,780	**

AADT

	B	C	D	E
2 Lane	*	15,300	21,700	**
4 Lane	*	30,700	36,600	**
6 Lane	*	47,700	54,100	**
8 Lane	*	64,000	64,200	**

(C3R-Suburban Residential)

	B	C	D	E
1 Lane	*	970	1,110	**
2 Lane	*	1,700	1,850	**
3 Lane	*	2,620	2,730	**

	B	C	D	E
2 Lane	*	1,760	2,020	**
4 Lane	*	3,090	3,360	**
6 Lane	*	4,760	4,960	**

	B	C	D	E
2 Lane	*	19,600	22,400	**
4 Lane	*	34,300	37,300	**
6 Lane	*	52,900	55,100	**

Adjustment Factors

The peak hour directional service volumes should be adjust by multiplying by 1.2 for one-way facilities
The AADT service volumes should be adjusted by multiplying 0.6 for one way facilities 2 Lane Divided Roadway with an Exclusive Left Turn Lane(s): Multiply by 1.05
2 lane Undivided Roadway with No Exclusive Left Turn Lane(s): Multiply by 0.80

Exclusive right turn lane(s): Multiply by 1.05
Multilane Undivided Roadway with an Exclusive Left Turn Lane(s): Multiply by 0.95
Multilane Roadway with No Exclusive Left Turn Lane(s): Multiply by 0.75
Non-State Signalized Roadway: Multiply by 0.90

This table does not constitute a standard and should be used only for general planning applications. The table should not be used for corridor or intersection design, where more refined techniques exist.
* Cannot be achieved using table input value defaults.
** Not applicable for that level of service letter grade. For the automobile mode, volumes greater than level of service D become F because intersection capacities have been reached.

LEE COUNTY GENERALIZED PEAK HOUR DIRECTIONAL SERVICE VOLUMES TABLE

Lee County
Generalized Peak Hour Directional Service Volumes
Urbanized Areas

April 2016 c:\input5

Uninterrupted Flow Highway

Level of Service

Lane	Divided	A	B	C	D	E
1	Undivided	130	420	850	1,210	1,640
2	Divided	1,060	1,810	2,560	3,240	3,590
3	Divided	1,600	2,720	3,840	4,860	5,380

Arterials

Class I (40 mph or higher posted speed limit)

Level of Service

Lane	Divided	A	B	C	D	E
1	Undivided	*	140	800	860	860
2	Divided	*	250	1,840	1,960	1,960
3	Divided	*	400	2,840	2,940	2,940
4	Divided	*	540	3,830	3,940	3,940

Class II (35 mph or slower posted speed limit)

Level of Service

Lane	Divided	A	B	C	D	E
1	Undivided	*	*	330	710	780
2	Divided	*	*	710	1,590	1,660
3	Divided	*	*	1,150	2,450	2,500
4	Divided	*	*	1,580	3,310	3,340

Controlled Access Facilities

Level of Service

Lane	Divided	A	B	C	D	E
1	Undivided	*	160	880	940	940
2	Divided	*	270	1,970	2,100	2,100
3	Divided	*	430	3,050	3,180	3,180

Collectors

Level of Service

Lane	Divided	A	B	C	D	E
1	Undivided	*	*	310	660	740
1	Divided	*	*	330	700	780
2	Undivided	*	*	730	1,440	1,520
2	Divided	*	*	770	1,510	1,600

Note: the service volumes for I-75 (freeway), bicycle mode, pedestrian mode, and bus mode should be from FDOT's most current version of LOS Handbook.

LEE COUNTY LINK SPECIFIC PEAK HOUR DIRECTIONAL SERVICE VOLUMES TABLE

LINK-SPECIFIC SERVICE VOLUMES ON ARTERIALS IN LEE COUNTY (2015 DATA)

) SEGMENT	FROM	TO	TRAFFIC DISTRIC	LENGTH (MILE)	ROAD TYPE	SERVICE VOLUMES (PEAK HOUR--PEAK DIRECTION)					SERVICE VOLUMES (PEAK HOUR--BOTH DIRECTIONS)				
						A	B	C	D	E	A	B	C	D	E
BAMA RD	SR 82	MILWAUKEE BLVD	3	1.9	2LN	110	260	440	590	990	210	490	820	1,100	1,840
	MILWAUKEE BLVD	HOMESTEAD RD	3	1.7	2LN	110	260	440	590	990	210	490	820	1,100	1,840
CANDER BELL BLVI	SR 82	MILWAUKEE BLVD	3	2.3	2LN	120	290	480	660	990	230	540	890	1,230	1,840
	MILWAUKEE BLVD	LEELAND HEIGHTS	3	3.4	2LN	120	290	480	660	990	230	540	890	1,230	1,840
O RD	US 41	DUSTY RD	4	0.5	4LD	0	1,930	1,980	1,980	1,980	0	3,720	3,800	3,800	3,800
	DUSTY RD	LEE RD	4	1.6	6LD	0	2,960	2,960	2,960	2,960	0	5,700	5,700	5,700	5,700
	LEE RD	THREE OAKS PKWY	4	0.8	6LD	0	2,960	2,960	2,960	2,960	0	5,700	5,700	5,700	5,700
	THREE OAKS PKWY	I-75	4	0.5	6LD	0	2,960	2,960	2,960	2,960	0	5,700	5,700	5,700	5,700
	I-75	BEN HILL GRIFFIN PKWY	3	0.5	6LD	0	2,960	2,960	2,960	2,960	0	5,700	5,700	5,700	5,700
	BEN HILL GRIFFIN PKWY	CORKSCREW RD	3	6.9	2LN	70	280	540	760	1,100	140	540	1,040	1,470	2,120
HILL GRIFFIN PKWY	CORKSCREW RD	FGCU ENTRANCE	3	2.2	4LD	940	2,000	2,000	2,000	2,000	1,750	3,690	3,690	3,690	3,690
	FGCU ENTRANCE	COLLEGE CLUB DR	3	1.8	4LD	940	2,000	2,000	2,000	2,000	1,750	3,690	3,690	3,690	3,690
	COLLEGE CLUB DR	ALICO RD	3	0.5	6LD	1,450	3,000	3,000	3,000	3,000	2,690	5,560	5,560	5,560	5,560
TA BEACH RD	HICKORY BLVD	VANDERBILT DR	8	1.5	4LD	0	530	1,900	1,900	1,900	0	1,000	3,600	3,600	3,600
	VANDERBILT DR	US 41	8	0.7	4LD	0	530	1,900	1,900	1,900	0	1,000	3,600	3,600	3,600
	US 41	HACIENDA VILLAGE	8	0.7	4LD	0	340	1,860	1,860	1,860	0	630	3,450	3,450	3,450
	HACIENDA VILLAGE	OLD 41	8	1.0	4LD	0	340	1,860	1,860	1,860	0	630	3,450	3,450	3,450
	OLD 41	IMPERIAL ST	8	1.1	6LD	0	530	2,800	2,800	2,800	0	990	5,190	5,190	5,190
	IMPERIAL ST	I-75	8	0.7	6LD	0	530	2,800	2,800	2,800	0	990	5,190	5,190	5,190
	I-75	BONITA GRANDE DR	8	0.7	4LD	0	1,690	2,020	2,020	2,020	0	3,130	3,750	3,750	3,750
	BONITA GRANDE DR	END OF CO. MAINTAINED	8	1.0	4LD	0	1,690	2,020	2,020	2,020	0	3,130	3,750	3,750	3,750
SCOUT RD	SUMMERLIN RD	CLAYTON CT	1	0.3	6LN	0	0	0	940	2,520	0	0	0	1,700	4,550
	CLAYTON CT	US 41	1	0.2	6LN	0	0	0	940	2,520	0	0	0	1,700	4,550
CINGHAM RD	SR 82	ORANGE RIVER BLVD	3	7.8	2LN	60	190	430	620	990	120	360	820	1,170	1,870
	ORANGE RIVER BLVD	SR 80	3	2.6	2LN	60	190	430	620	990	120	360	820	1,170	1,870
NT STORE RD	SR 78	VAN BUREN PKWY	5	3.6	4LD	870	1,490	2,100	2,660	2,950	1,530	2,620	3,690	4,670	5,180
	VAN BUREN PKWY	COUNTY LINE	5	6.3	2LN	150	390	640	880	1,140	270	690	1,130	1,550	2,010
NESS 41	SR 80	N. END OF BRIDGE	2	1.2	6LB	1,440	2,440	3,450	4,420	5,120	2,220	3,760	5,310	6,800	7,880
	N. END OF BRIDGE	PONDELLA RD	2	0.5	6LD	0	2,460	2,780	2,780	2,780	0	3,790	4,270	4,270	4,270
	PONDELLA RD	SR 78	2	1.1	6LD	0	2,460	2,780	2,780	2,780	0	3,790	4,270	4,270	4,270
	SR 78	LITTLETON RD	2	1.3	4LD	0	1,580	1,840	1,840	1,840	0	2,440	2,870	2,870	2,870
	LITTLETON RD	US 41	2	1.3	4LD	0	1,580	1,840	1,840	1,840	0	2,440	2,870	2,870	2,870
CORAL BRIDGE	DEL PRADO BLVD	WEST END OF BRDG	4 & 5	0.4	4LD	0	0	1,340	1,900	1,900	0	0	2,280	3,230	3,230
	WEST END OF BRDG	McGREGOR BLVD	4 & 5	1.3	4LB	1,120	1,900	2,680	3,440	4,000	1,910	3,230	4,540	5,820	6,790
LEGE PKWY	McGREGOR BLVD	WINKLER RD	4	0.8	6LD	0	0	1,290	2,800	2,980	0	0	2,190	4,750	5,040
	WINKLER RD	WHISKEY CREEK DR	4	0.8	6LD	0	0	1,290	2,800	2,980	0	0	2,190	4,750	5,040
	WHISKEY CREEK DR	SUMMERLIN RD	4	0.8	6LD	0	0	1,290	2,800	2,980	0	0	2,190	4,750	5,040
	SUMMERLIN RD	US 41	4	0.9	6LD	0	0	1,290	2,800	2,980	0	0	2,190	4,750	5,040
ONIAL BLVD	McGREGOR BLVD	SUMMERLIN RD	1	0.4	6LD	0	0	1,530	2,840	2,840	0	0	2,560	4,740	4,740
	SUMMERLIN RD	US 41	1	0.7	6LD	0	0	1,530	2,840	2,840	0	0	2,560	4,740	4,740
	US 41	FOWLER ST	1	0.5	6LD	0	0	1,530	2,840	2,840	0	0	2,560	4,740	4,740

LINK-SPECIFIC SERVICE VOLUMES ON ARTERIALS IN LEE COUNTY (2015 DATA)

D SEGMENT	FROM	TO	TRAFFIC DISTRIC	LENGTH (MILE)	ROAD TYPE	SERVICE VOLUMES (PEAK HOUR PEAK DIRECTION)					SERVICE VOLUMES (PEAK HOUR--BOTH DIRECTIONS)				
						A	B	C	D	E	A	B	C	D	E
MERLIN RD	McGREGOR BLVD	SAN CARLOS BLVD	4	2.2	4LD	1,620	1,980	1,980	1,980	1,980	2,850	3,490	3,490	3,490	3,490
	SAN CARLOS BLVD	PINE RIDGE RD	4	0.5	6LD	2,520	3,000	3,000	3,000	3,000	4,430	5,270	5,270	5,270	5,270
	PINE RIDGE RD	BASS RD	4	1.7	6LD	2,520	3,000	3,000	3,000	3,000	4,430	5,270	5,270	5,270	5,270
	BASS RD	GLADIOLUS DR	4	1.8	6LD	2,520	3,000	3,000	3,000	3,000	4,430	5,270	5,270	5,270	5,270
	GLADIOLUS DR	CYPRESS LAKE DR	4	1.8	4LD	0	1,450	1,900	1,900	1,900	0	2,590	3,400	3,400	3,400
	CYPRESS LAKE DR	COLLEGE PKWY	4	0.7	6LD	0	2,250	2,880	2,880	2,880	0	4,020	5,140	5,140	5,140
	COLLEGE PKWY	BOY SCOUT	4	1.9	6LD	0	2,250	2,880	2,880	2,880	0	4,020	5,140	5,140	5,140
	BOY SCOUT	COLONIAL BLVD	1	1.1	4LD	0	0	0	1,370	1,820	0	0	0	2,450	3,250
HINE BLVD	SR 82	LEE BLVD	3	3.6	2LN	150	310	500	700	1,010	250	500	810	1,130	1,630
	LEE BLVD	W 12TH ST	3	3.2	2LN	150	310	500	700	1,010	250	500	810	1,130	1,630
E OAKS PKWY	COCONUT RD	CORKSCREW RD	4	2.6	4LD	650	1,940	1,940	1,940	1,940	1,130	3,360	3,360	3,360	3,360
	CORKSCREW RD	SAN CARLOS BLVD	4	3.1	4LD	650	1,940	1,940	1,940	1,940	1,130	3,360	3,360	3,360	3,360
	SAN CARLOS BLVD	ALICO RD	4	1.7	4LD	650	1,940	1,940	1,940	1,940	1,130	3,360	3,360	3,360	3,360
LINE AVE	ALICO RD	DANIELS PKWY	3	3.8	4LD	1,530	2,980	2,980	2,980	2,980	2,600	3,360	3,360	3,360	3,360
	DANIELS PKWY	COLONIAL BLVD	3	4.5	4LD	1,530	2,980	2,980	2,980	2,980	2,600	3,360	3,360	3,360	3,360
	COLLIER CO. LINE	BONITA BEACH RD	8	1.0	6LD	0	2,400	2,740	2,740	2,740	0	4,220	4,830	4,830	4,830
	BONITA BEACH RD	TERRY ST	8	1.1	6LD	0	2,580	3,040	3,040	3,040	0	4,610	5,430	5,430	5,430
	TERRY ST	OLD 41	8	2.3	6LD	0	2,580	3,040	3,040	3,040	0	4,610	5,430	5,430	5,430
	OLD 41	CORKSCREW RD	8	3.5	6LD	0	2,580	3,040	3,040	3,040	0	4,610	5,430	5,430	5,430
	CORKSCREW RD	BROADWAY	4	0.7	6LD	480	2,940	2,940	2,940	2,940	860	5,260	5,260	5,260	5,260
	BROADWAY	SANIBEL BLVD	4	1.9	6LD	480	2,940	2,940	2,940	2,940	860	5,260	5,260	5,260	5,260
	SANIBEL BLVD	ALICO RD	4	2.2	6LD	480	2,940	2,940	2,940	2,940	860	5,260	5,260	5,260	5,260
	ALICO RD	ISLAND PARK RD	4	1.0	6LD	480	2,940	2,940	2,940	2,940	860	5,260	5,260	5,260	5,260
	ISLAND PARK RD	JAMAICA BAY W.	4	1.6	6LD	480	2,940	2,940	2,940	2,940	860	5,260	5,260	5,260	5,260
	JAMAICA BAY W.	SIX MILE PKWY	4	0.5	6LD	480	2,940	2,940	2,940	2,940	860	5,260	5,260	5,260	5,260
	SIX MILE PKWY	ANDREA LN	4	0.5	6LD	0	0	2,130	2,880	2,880	0	0	4,220	5,710	5,710
	ANDREA LN	DANIELS PKWY	4	0.8	6LD	0	0	2,130	2,880	2,880	0	0	4,220	5,710	5,710
	DANIELS PKWY	COLLEGE PKWY	4	0.7	6LD	0	0	2,130	2,880	2,880	0	0	4,220	5,710	5,710
	COLLEGE PKWY	SOUTH RD	4	1.4	6LD	0	0	2,130	2,880	2,880	0	0	4,220	5,710	5,710
	SOUTH RD	BOY SCOUT RD	4	0.4	6LD	0	0	2,130	2,880	2,880	0	0	4,220	5,710	5,710
	BOY SCOUT RD	NORTH AIRPORT RD	1	0.8	6LD	0	0	2,130	2,880	2,880	0	0	4,220	5,710	5,710
	NORTH AIRPORT RD	COLONIAL BLVD	1	0.2	6LD	0	0	2,130	2,880	2,880	0	0	4,220	5,710	5,710
	FORT MYERS CITY LIMI	NORTH KEY DR	1	0.4	4LD	0	1,790	2,160	2,160	2,160	0	2,890	3,500	3,500	3,500
	NORTH KEY DR	HANCOCK BRIDGE PKWY	2	0.7	4LD	0	1,790	2,160	2,160	2,160	0	2,890	3,500	3,500	3,500
	HANCOCK BRIDGE PKW	PONDELLA RD	2	0.3	4LD	0	1,790	2,160	2,160	2,160	0	2,890	3,500	3,500	3,500
	PONDELLA RD	SR 78	2	1.3	4LD	0	1,790	2,160	2,160	2,160	0	2,890	3,500	3,500	3,500
	SR 78	LITTLETON RD	2	1.0	4LD	900	2,000	2,000	2,000	2,000	1,460	3,240	3,240	3,240	3,240
	LITTLETON RD	BUS 41	2	1.2	4LD	900	2,000	2,000	2,000	2,000	1,460	3,240	3,240	3,240	3,240
	BUS 41	DEL PRADO BLVD	2	0.8	4LD	900	2,000	2,000	2,000	2,000	1,460	3,240	3,240	3,240	3,240
	DEL PRADO BLVD	TRAIL DAIRY	2	0.8	4LD	900	2,000	2,000	2,000	2,000	1,460	3,240	3,240	3,240	3,240

LINK-SPECIFIC SERVICE VOLUMES ON ARTERIALS IN LEE COUNTY (2015 DATA)

D SEGMENT	FROM	TO	TRAFFIC DISTRIC	LENGTH (MILE)	ROAD TYPE	SERVICE VOLUMES (PEAK HOUR PEAK DIRECTION)					SERVICE VOLUMES (PEAK HOUR--BOTH DIRECTIONS)				
						A	B	C	D	E	A	B	C	D	E
RANS MEM. PKWY	McGREGOR BLVD	DEL PRADO BLVD	1 & 5	3.5	4LB	1,120	1,900	2,680	3,440	4,000	1,880	3,170	4,460	5,720	6,680
	DEL PRADO BLVD	SANTA BARBARA BLVD	5	2.0	6LD	2,190	3,080	3,080	3,080	3,080	3,660	5,150	5,150	5,150	5,150
	SANTA BARBARA BLVD	SKYLINE BLVD	5	1.0	6LD	2,190	3,080	3,080	3,080	3,080	3,660	5,150	5,150	5,150	5,150
	SKYLINE BLVD	SR 78	5	3.5	4LD	1,400	2,040	2,040	2,040	2,040	2,340	3,420	3,420	3,420	3,420
LER RD	SUMMERLIN RD	GLADIOLUS DR	4	0.4	4LD	0	0	590	1,520	1,520	0	0	990	2,530	2,530
	GLADIOLUS DR	BRANDYWINE CIR	4	0.9	2LN	0	750	880	880	880	0	1,260	1,460	1,460	1,460
	BRANDYWINE CIR	CYPRESS LAKE DR	4	0.9	2LN	0	750	880	880	880	0	1,260	1,460	1,460	1,460
	CYPRESS LAKE DR	COLLEGE PKWY	4	0.7	4LD	0	0	610	1,780	1,780	0	0	1,020	2,960	2,960
	COLLEGE PKWY	SUNSET VISTA	4	0.5	2LN	0	770	800	800	800	0	1,290	1,330	1,330	1,330
	SUNSET VISTA	McGREGOR BLVD	4	0.8	2LN	0	770	800	800	800	0	1,290	1,330	1,330	1,330

SERVICE VOLUMES ON COLLECTORS IN LEE COUNTY (2015 DATA)

D SEGMENT	FROM	TO	TRAFFIC DISTRIC	LENGTH (MILE)	ROAD TYPE	SERVICE VOLUMES (PEAK HOUR PEAK DIRECTION)					SERVICE VOLUMES (PEAK HOUR--BOTH DIRECTIONS)				
						A	B	C	D	E	A	B	C	D	E
LECTORS					2LU	0	0	550	860	860	0	0	990	1,530	1,530
					2LD	0	0	580	910	910	0	0	1,040	1,610	1,610
					4LU	0	0	1,240	1,700	1,700	0	0	2,200	3,030	3,030
					4LD	0	0	1,310	1,790	1,790	0	0	2,340	3,190	3,190

TRAFFIC DATA

FDOT FLORIDA TRAFFIC ONLINE

&

LEE COUNTY TRAFFIC DATA MANAGEMENT SYSTEM (TCDS)

FLORIDA DEPARTMENT OF TRANSPORTATION
TRANSPORTATION STATISTICS OFFICE
2024 HISTORICAL AADT REPORT

COUNTY: 12 - LEE

SITE: 0068 - SR 82, WEST OF BELL BOULEVARD S (LC212)

YEAR	AADT	DIRECTION 1	DIRECTION 2	*K FACTOR	D FACTOR	T FACTOR
2024	22500 F	E 12000	W 10500	9.00	56.00	14.10
2023	20700 C	E 11000	W 9700	9.00	53.80	14.10
2022	17200 C	E 8700	W 8500	9.00	53.70	18.50
2021	15700 C	E 7900	W 7800	9.00	53.10	14.10
2020	11600 S	E 5700	W 5900	9.00	54.00	13.90
2019	11800 F	E 5800	W 6000	9.00	57.60	13.90
2018	11400 C	E 5600	W 5800	9.00	58.50	13.90
2017	12200 C	E 6100	W 6100	9.00	58.20	11.20
2016	10200 C	E 5100	W 5100	9.00	58.20	9.70
2015	10100 C	E 5000	W 5100	9.00	62.20	11.40
2014	10300 C	E 5200	W 5100	9.00	63.40	9.20
2013	8600 F	E 4300	W 4300	9.00	64.30	11.60
2012	8400 C	E 4200	W 4200	9.00	60.20	11.60
2011	9000 F	E 4500	W 4500	9.00	61.10	13.10
2010	8800 C	E 4400	W 4400	10.06	63.11	13.10
2009	9100 C	E 4600	W 4500	10.54	62.17	11.20

AADT FLAGS: C = COMPUTED; E = MANUAL ESTIMATE; F = FIRST YEAR ESTIMATE
S = SECOND YEAR ESTIMATE; T = THIRD YEAR ESTIMATE; R = FOURTH YEAR ESTIMATE
V = FIFTH YEAR ESTIMATE; 6 = SIXTH YEAR ESTIMATE; X = UNKNOWN
*K FACTOR: STARTING WITH YEAR 2011 IS STANDARDK, PRIOR YEARS ARE K30 VALUES

FLORIDA DEPARTMENT OF TRANSPORTATION
TRANSPORTATION STATISTICS OFFICE
2024 HISTORICAL AADT REPORT

COUNTY: 12 - LEE

SITE: 6021 - SR 82/IMMOKOLEE RD, 3000' E OF GUNNERY RD, PTMS 101, LCPR 21

YEAR	AADT	DIRECTION 1	DIRECTION 2	*K FACTOR	D FACTOR	T FACTOR
2024	48000 S	0	0	9.00	56.00	10.00
2023	47500 F	0	0	9.00	54.50	8.50
2022	45500 C	E 24000	W 21500	9.00	52.70	8.50
2021	28000 X	0	0	9.00	52.60	7.60
2020	28500 X	0	0	9.00	54.00	7.70
2019	30000 T	0	0	9.00	57.60	9.50
2018	29000 S	0	0	9.00	58.50	9.40
2017	28500 F	0	0	9.00	65.10	7.30
2016	28137 C	E 14317	W 13820	9.00	65.10	6.00
2015	26771 C	E 13569	W 13202	9.00	65.10	7.70
2014	25227 C	E 12754	W 12473	9.00	66.20	8.40
2013	23844 C	E 12596	W 11248	9.00	68.60	5.40
2012	22000 F	E 0	W 0	9.00	66.60	7.40
2011	22182 C	E 11177	W 11005	9.00	66.60	9.10
2010	21207 C	E 10845	W 10362	9.51	66.56	6.80
2009	19500 F	0	0	9.96	65.45	7.80

AADT FLAGS: C = COMPUTED; E = MANUAL ESTIMATE; F = FIRST YEAR ESTIMATE
S = SECOND YEAR ESTIMATE; T = THIRD YEAR ESTIMATE; R = FOURTH YEAR ESTIMATE
V = FIFTH YEAR ESTIMATE; 6 = SIXTH YEAR ESTIMATE; X = UNKNOWN
*K FACTOR: STARTING WITH YEAR 2011 IS STANDARDK, PRIOR YEARS ARE K30 VALUES

FLORIDA DEPARTMENT OF TRANSPORTATION
TRANSPORTATION STATISTICS OFFICE
2024 HISTORICAL AADT REPORT

COUNTY: 12 - LEE

SITE: 4623 - ALABAMA ROAD, NORTH OF S.R. 82

YEAR	AADT	DIRECTION 1		DIRECTION 2		*K FACTOR	D FACTOR	T FACTOR
2024	14900 F	N	7800	S	7100	9.00	55.40	7.20
2023	14200 C	N	7400	S	6800	9.00	55.40	7.20
2022	7300 X		0		0	9.00	53.90	8.50
2021	7000 X		0		0	9.00	53.50	7.60
2020	6600 E		0		0	9.00	53.40	6.20
2019	8400 F	N		S		9.00	53.80	6.20
2018	7700 C	N	4000	S	3700	9.00	53.30	6.20
2017	8500 T	N	4300	S	4200	9.00	55.40	7.30
2016	7900 S	N	4000	S	3900	9.00	63.90	4.40
2015	7500 F	N	3800	S	3700	9.00	55.50	4.40
2014	7100 C	N	3600	S	3500	9.00	55.20	4.40
2013	6000 S		0		0	9.00	55.00	6.50
2012	6000 F		0		0	9.00	55.30	7.40
2011	6000 C	N	0	S	0	9.00	55.20	9.10

AADT FLAGS: C = COMPUTED; E = MANUAL ESTIMATE; F = FIRST YEAR ESTIMATE
S = SECOND YEAR ESTIMATE; T = THIRD YEAR ESTIMATE; R = FOURTH YEAR ESTIMATE
V = FIFTH YEAR ESTIMATE; 6 = SIXTH YEAR ESTIMATE; X = UNKNOWN
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FLORIDA DEPARTMENT OF TRANSPORTATION
TRANSPORTATION STATISTICS OFFICE
2024 HISTORICAL AADT REPORT

COUNTY: 12 - LEE

SITE: 4182 - SUNSHINE BLVD., NORTH OF S.R. 82

YEAR	AADT	DIRECTION 1		DIRECTION 2		*K FACTOR	D FACTOR	T FACTOR
2024	12200 F	N	6500	S	5700	9.00	55.40	11.20
2023	11600 C	N	6200	S	5400	9.00	55.40	11.20
2022	10200 C	N	5500	S	4700	9.00	53.90	10.00
2021	7800 X		0		0	9.00	53.50	7.60
2020	7400 E		0		0	9.00	59.30	7.30
2019	7400 F	N		S		9.00	59.60	7.30
2018	7100 C	N	3700	S	3400	9.00	53.30	7.30
2017	6300 T	N	3300	S	3000	9.00	55.40	7.30
2016	5900 S	N	3100	S	2800	9.00	63.90	4.90
2015	5600 F	N	2900	S	2700	9.00	55.50	4.90
2014	5400 C	N	2800	S	2600	9.00	55.20	4.90
2013	4100 S		0		0	9.00	55.00	6.50
2012	4100 F		0		0	9.00	55.30	7.40
2011	4100 C	N	0	S	0	9.00	55.20	9.10

AADT FLAGS: C = COMPUTED; E = MANUAL ESTIMATE; F = FIRST YEAR ESTIMATE
S = SECOND YEAR ESTIMATE; T = THIRD YEAR ESTIMATE; R = FOURTH YEAR ESTIMATE
V = FIFTH YEAR ESTIMATE; 6 = SIXTH YEAR ESTIMATE; X = UNKNOWN
*K FACTOR: STARTING WITH YEAR 2011 IS STANDARDK, PRIOR YEARS ARE K30 VALUES

FLORIDA DEPARTMENT OF TRANSPORTATION
TRANSPORTATION STATISTICS OFFICE
2024 HISTORICAL AADT REPORT

COUNTY: 12 - LEE

SITE: 6072 - MILWAUKEE BLVD

YEAR	AADT	DIRECTION 1	DIRECTION 2	*K FACTOR	D FACTOR	T FACTOR
2024	7100 E			10.00	54.00	5.60

AADT FLAGS: C = COMPUTED; E = MANUAL ESTIMATE; F = FIRST YEAR ESTIMATE
S = SECOND YEAR ESTIMATE; T = THIRD YEAR ESTIMATE; R = FOURTH YEAR ESTIMATE
V = FIFTH YEAR ESTIMATE; 6 = SIXTH YEAR ESTIMATE; X = UNKNOWN
*K FACTOR: STARTING WITH YEAR 2011 IS STANDARDK, PRIOR YEARS ARE K30 VALUES

FLORIDA DEPARTMENT OF TRANSPORTATION
TRANSPORTATION STATISTICS OFFICE
2024 HISTORICAL AADT REPORT

COUNTY: 12 - LEE

SITE: 0152 - JAGUAR BLVD, E OF SR 82

YEAR	AADT	DIRECTION 1	DIRECTION 2	*K FACTOR	D FACTOR	T FACTOR
2024	4000 F	E 1900	W 2100	9.00	55.40	12.80
2023	3800 C	E 1800	W 2000	9.00	55.40	13.60
2022	2600 X	0	0	9.00	53.90	16.40
2021	2500 X	0	0	9.00	53.50	14.50
2020	2400 E	0	0	9.00		9.90
2019	2400 E	E 0	W 0	9.00		11.60
2018	2100 C	E 1000	W 1100	9.00	53.30	11.60
2017	3900 S	E 1900	W 2000	9.00	55.40	10.50
2016	3700 F	E 1800	W 1900	9.00	63.90	10.80
2015	3500 C	E 1700	W 1800	9.00	55.50	11.00

AADT FLAGS: C = COMPUTED; E = MANUAL ESTIMATE; F = FIRST YEAR ESTIMATE
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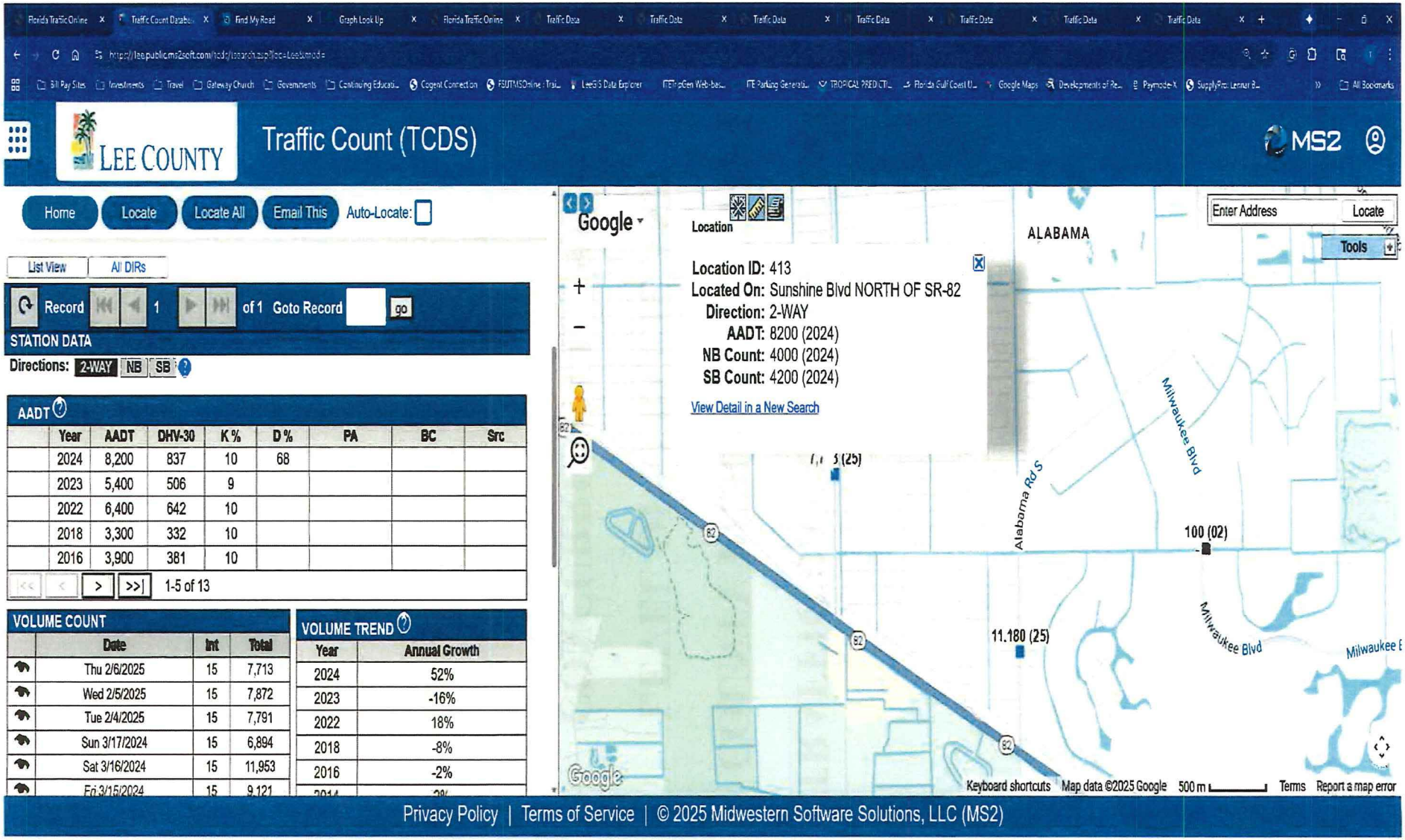
V = FIFTH YEAR ESTIMATE; 6 = SIXTH YEAR ESTIMATE; X = UNKNOWN
*K FACTOR: STARTING WITH YEAR 2011 IS STANDARDK, PRIOR YEARS ARE K30 VALUES


LEE COUNTY
Traffic Count (TCDS)
MS2
Home
Locate
Locate All
Email This
Auto-Locate:
List View
All DIRs
Record
1
of 1
Goto Record
go
STATION DATA
Directions: 2-WAY NB SB
AADT
Year AADT DHV-30 K % D % PA BC Src
2024 8,200 837 10 68
2023 5,400 506 9
2022 6,400 642 10
2018 3,300 332 10
2016 3,900 381 10
1-5 of 13
VOLUME COUNT
Date Int Total
Thu 2/6/2025 15 7,713
Wed 2/5/2025 15 7,872
Tue 2/4/2025 15 7,791
Sun 3/17/2024 15 6,894
Sat 3/16/2024 15 11,953
Fri 3/15/2024 15 9,121
VOLUME TREND
Year Annual Growth
2024 52%
2023 -16%
2022 18%
2018 -8%
2016 -2%
Google
Location
Location ID: 413
Located On: Sunshine Blvd NORTH OF SR-82
Direction: 2-WAY
AADT: 8200 (2024)
NB Count: 4000 (2024)
SB Count: 4200 (2024)
View Detail in a New Search
Enter Address
Locate
Tools
ALABAMA
Milwaukee Blvd
Alabama Rd S
100 (02)
11,180 (25)
Keyboard shortcuts
Map data ©2025 Google
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TRAFFIC DATA FROM THE LEE COUNTY PUBLIC FACILITIES LEVEL OF SERVCIE AND CONCURRENCY REPORT

LEE COUNTY ROAD LINK VOLUMES (County- and State-Maintained Roadways)

Link No.	ROAD NAME	LOCATION		ROAD TYPE	PERFORMANCE STANDARD		2023 100TH HIGHEST HOUR			2028 FUTURE FORECAST*			Notes
		FROM	TO		LOS[1]	CAPACITY[2]	LOS[1]	VOLUME[2]	V/C[3]	LOS[1]	VOLUME[2]	V/C[3]	
00100	A & W BULB RD	GLADIOLUS DR	McGREGOR BLVD	2LN	E	860	C	384	0.45	C	404	0.47	
00200	ALABAMA RD	SR 82	MILWAUKEE BLVD	2LN	E	990	C	428	0.43	D	479	0.48	pre-development order res development
00300	ALABAMA RD	MILWAUKEE BLVD	HOMESTEAD RD	2LN	E	990	D	481	0.49	D	506	0.51	
00400	ALEXANDER BELL BLVD	SR 82	MILWAUKEE BLVD	2LN	E	990	D	547	0.55	D	575	0.58	
00500	ALEXANDER BELL BLVD	MILWAUKEE BLVD	LEELAND HEIGHTS	2LN	E	990	D	547	0.55	D	637	0.64	pre-development order res development
00590	ALICO RD	US 41	DUSTY RD	4LD	E	1,980	B	1,170	0.59	B	1,230	0.62	
00600	ALICO RD	DUSTY RD	LEE RD	6LD	E	2,960	B	1,170	0.40	B	1,298	0.44	
00700	ALICO RD	LEE RD	THREE OAKS PKWY	6LD	E	2,960	B	1,170	0.40	B	1,422	0.48	Three Oaks Distribution Center
00800	ALICO RD	THREE OAKS PKWY	I-75	6LD	E	2,960	E	2,761	0.93	E	2,902	0.98	
00900	ALICO RD	I-75	BEN HILL GRIFFIN BLVD	6LD	E	2,960	B	1,448	0.49	B	1,521	0.51	[4]
01000	ALICO RD	BEN HILL GRIFFIN BLVD	GREEN MEADOW DR	2LN/4LN	E	1100/1960	E	853	0.78	C	1,171	0.60	[4][5]; unincorporated Lee Co; Ctr Pl/Prm Aprt Pk
01050	ALICO RD	GREEN MEADOW DR	CORKSCREW RD	2LN	E	1,100	B	256	0.23	B	269	0.24	[4]
01200	BABCOCK RD	US 41	ROCKEFELLER CIR	2LN	E	860	C	60	0.07	C	65	0.08	[4]
01400	BARRETT RD	PONDELLA RD	PINE ISLAND RD (US 78)	2LN	E	860	C	150	0.17	C	158	0.18	
01500	BASS RD	SUMMERLIN RD	GLADIOLUS DR	4LN	E	1,790	C	655	0.37	C	709	0.40	
01600	BAYSHORE RD (SR 78)	BUS 41	NEW POST RD/HART RD	4LD	D	1,942	F	2,046	1.05	F	2,302	1.19	
01700	BAYSHORE RD (SR 78)	HART RD	SLATER RD	4LD	D	1,942	F	2,070	1.07	F	2,515	1.30	
01800	BAYSHORE RD (SR 78)	SLATER RD	I-75	4LD	D	2,910	B	1,275	0.44	B	1,426	0.49	
01900	BAYSHORE RD (SR 78)	I-75	NALLE RD	2LN	D	1,166	C	846	0.73	C	1,007	0.86	
02000	BAYSHORE RD (SR 78)	NALLE RD	SR 31	2LN	D	1,166	C	846	0.73	C	1,007	0.86	Bayshore Ranch/Stonehill Manor
02100	BEN HILL GRIFFIN PKWY	CORKSCREW RD	FGCU ENTRANCE	4LD	E	2,000	B	1,548	0.77	B	1,700	0.85	Grandeza
02200	BEN HILL GRIFFIN PKWY	FGCU BOULEVARD S	COLLEGE CLUB DR	4LD	E	2,000	B	1,548	0.77	B	1,627	0.81	
02250	BEN HILL GRIFFIN PKWY	COLLEGE CLUB DR	ALICO RD	6LD	E	3,000	B	1,525	0.51	B	1,603	0.53	
26950	BEN HILL GRIFFIN PKWY	ALICO RD	TERMINAL ACCESS RD	4LD	E	1,980	B	1,041	0.53	B	1,094	0.55	unincorporated Lee County
02300	BETH STACEY BLVD	23RD ST	HOMESTEAD RD	2LN	E	860	C	314	0.37	C	451	0.52	Ibis Landing (a.k.a. Copperhead Glf Community)
02400	BONITA BEACH RD	HICKORY BLVD	VANDERBILT DR	4LD	E	1,900	C	572	0.30	C	601	0.32	[4]; constrained in city plan
02500	BONITA BEACH RD	VANDERBILT DR	US 41	4LD	E	1,900	C	1,124	0.59	C	1,181	0.62	constrained in city plan
02600	BONITA BEACH RD	US 41	OLD 41	4LD	E	1,860	C	1,713	0.92	C	1,800	0.97	constrained; old count projection (2010)
02700	BONITA BEACH RD	OLD 41	IMPERIAL ST	6LD	E	2,800	C	2,184	0.78	C	2,295	0.82	constrained in city plan
02800	BONITA BEACH RD	IMPERIAL ST	W OF I-75	6LD	E	2,800	C	2,144	0.77	C	2,253	0.80	constrained in city plan
02900	BONITA BEACH RD	E OF I-75	BONITA GRAND DR	4LD	E	2,020	B	868	0.43	B	912	0.45	constrained in city plan
02950	BONITA BEACH RD	BONITA GRANDE DR	Logan Boulevard	4LD	E	2,020	B	868	0.43	B	912	0.45	constrained in city plan
03100	BONITA GRANDE DR	BONITA BEACH RD	E TERRY ST	2LN	E	860	C	497	0.58	C	522	0.61	
03200	BOYSCOUT RD	SUMMERLIN RD	US 41	6LN	E	2,520	E	1,757	0.70	E	1,847	0.73	
03300	BRANTLEY RD	SUMMERLIN RD	US 41	2LN	E	860	C	270	0.31	C	284	0.33	
03400	BRIARCLIFF RD	US 41	TRIPLE CROWN CT	2LN	E	860	C	160	0.19	C	168	0.20	
03500	BROADWAY RD (ALVA)	SR 80	North RIVER RD	2LN	E	860	C	284	0.33	C	298	0.35	
03700	BUCKINGHAM RD	SR 82	GUNNERY RD	2LN	E	990	D	470	0.47	D	504	0.51	
03730	BUCKINGHAM RD	GUNNERY RD	ORANGE RIVER BLVD	2LN	E	990	C	346	0.35	C	383	0.39	
03800	BUCKINGHAM RD	ORANGE RIVER BLVD	SR 80	2LN	E	990	E	718	0.73	E	976	0.99	Lee County Homes (a.k.a. Buckingham 345)
03900	BURNT STORE RD	SR 78	VAN BUREN PKWY	4LD	E	2,950	A	847	0.29	B	890	0.30	City of Cape Coral
04000	BURNT STORE RD	VAN BUREN PKWY	COUNTY LINE	2LN	E	1,140	D	724	0.64	D	761	0.67	partially located in City of Cape Coral
04200	BUS 41 (N TAMIAMI TR, SR 739)	CITY LIMITS (N END EDISON BRG)	PONDELLA RD	6LD	D	2,950	C	1,936	0.66	C	2,274	0.77	
04300	BUS 41 (N TAMIAMI TR, SR 739)	PONDELLA RD	SR 78	6LD	D	2,950	C	1,936	0.66	C	2,274	0.77	
04400	BUS 41 (N TAMIAMI TR, SR 739)	SR 78	LITTLETON RD	4LD	D	1,900	C	1,177	0.62	C	1,406	0.74	
04500	BUS 41 (N TAMIAMI TR, SR 739)	LITTLETON RD	US 41	4LD	D	1,900	C	682	0.36	C	846	0.45	
04600	CAPE CORAL BRIDGE	DEL PRADO BLVD	McGREGOR BLVD	4LB	E	4,000	D	3,073	0.77	D	3,230	0.81	
04700	CAPTIVA DR	BLIND PASS	SOUTH SEAS PLANTATION RD	2LN	E	860	C	267	0.31	C	281	0.33	constrained, old count (2010)

LEE COUNTY ROAD LINK VOLUMES (County- and State-Maintained Roadways)

Link No.	ROAD NAME	LOCATION		ROAD TYPE	PERFORMANCE STANDARD		2023 100TH HIGHEST HOUR			2028 FUTURE FORECAST*			Notes
		FROM	TO		LOS[1]	CAPACITY[2]	LOS[1]	VOLUME[2]	V/C[3]	LOS[1]	VOLUME[2]	V/C[3]	
14450	ESTERO PKWY	THREE OAKS PKWY	BEN HILL GRIFFIN PKWY	4LD	E	2,000	B	1,040	0.52	B	1,093	0.55	[4]
10200	EVERGREEN RD	US 41	BUS 41	2LN	E	860	C	103	0.12	C	108	0.13	[4]
10300	FIDDLESTICKS BLVD	GUARDHOUSE	DANIELS PKWY	2LN	E	860	C	290	0.34	C	305	0.35	
10400	FOWLER ST	US 41	N AIRPORT RD	6LD	E	2,300	D	1,276	0.55	D	1,341	0.58	
10500	FOWLER ST	N AIRPORT RD	COLONIAL BLVD	6LD	E	2,300	D	1,541	0.67	D	1,620	0.70	
10800	GASPARILLA BLVD	FIFTH ST	COUNTY LINE	2LN	E	860	C	309	0.36	C	325	0.38	constrained
	GATEWAY BLVD	DANIELS PKWY	GATEWAY LAKES BLVD	4LD	E	1,790	C	1,233	0.69	C	1,296	0.72	[4]
	GATEWAY BLVD	GATEWAY LAKES BLVD	SR82	2LN	E	860	C	505	0.59	C	531	0.62	[4]
10900	GLADIOLUS DR	McGREGOR BLVD	PINE RIDGE RD	4LD	E	1,840	C	547	0.30	C	575	0.31	
11000	GLADIOLUS DR	PINE RIDGE RD	BASS RD	4LD	E	1,840	C	1,193	0.65	C	1,254	0.68	
11100	GLADIOLUS DR	BASS RD	WINKLER RD	6LD	E	2,780	C	1,193	0.43	C	1,254	0.45	
11200	GLADIOLUS DR	WINKLER RD	SUMMERLIN RD	6LD	E	2,780	C	1,193	0.43	C	1,254	0.45	
11300	GLADIOLUS DR	SUMMERLIN RD	US 41	6LD	E	2,780	C	2,330	0.84	C	2,449	0.88	
11400	GREENBRIAR BLVD	RICHMOND AVE	JOEL BLVD	2LN	E	860	C	125	0.15	C	146	0.17	[4]
11500	GUNNERY RD	SR 82	LEE BLVD	4LD	E	1,920	B	1,426	0.74	B	1,545	0.80	pre-development order res development
11600	GUNNERY RD	LEE BLVD	BUCKINGHAM RD	2LN	E	1,020	C	742	0.73	C	799	0.78	pre-development order res development
11700	HANCOCK BRIDGE PKWY	DEL PRADO BLVD	NE 24TH AVE	4LD	E	1,880	B	1,120	0.60	B	1,177	0.63	
11800	HANCOCK BRIDGE PKWY	NE 24TH AVE	ORANGE GROVE BLVD	4LD	E	1,880	B	1,473	0.78	B	1,548	0.82	
11900	HANCOCK BRIDGE PKWY	ORANGE GROVE BLVD	MOODY RD	4LD	E	1,880	B	1,433	0.76	B	1,506	0.80	
12000	HANCOCK BRIDGE PKWY	MOODY RD	US 41	4LD	E	1,880	B	1,433	0.76	B	1,506	0.80	
12100	HART RD	SR 78	TUCKER LANE	2LN	E	860	C	291	0.34	C	306	0.36	[4]
12200	HICKORY BLVD	BONITA BEACH RD	McLAUGHLIN BLVD	2LN	E	890	E	479	0.54	E	503	0.57	[4]; constrained
12300	HICKORY BLVD	McLAUGHLIN BLVD	MELODY LANE	2LN	E	890	E	479	0.54	E	503	0.57	[4]; constrained
12400	HICKORY BLVD	MELODY LANE	ESTERO BLVD	2LN	E	890	E	479	0.54	E	503	0.57	[4]; constrained
12480	HOMESTEAD RD	SR 82	MILWAUKEE BLVD	2LN	E	1,010	C	473	0.47	D	497	0.49	[4]
12490	HOMESTEAD RD	MILWAUKEE BLVD	SUNRISE BLVD	2LN	E	1,010	C	473	0.47	D	497	0.49	[4]
12500	HOMESTEAD RD	SUNRISE BLVD	LEELAND HEIGHTS	4LN	E	1,960	C	473	0.24	C	518	0.26	
12600	HOMESTEAD RD	LEELAND HEIGHTS	LEE BLVD	4LN	E	1,960	D	1,324	0.68	D	1,392	0.71	
31800	I-75	BONITA BEACH RD	CORKSCREW RD	6LF/8LF	D	6080/9090	D	5,453	0.90	C	6,395	0.70	
31900	I-75	CORKSCREW RD	ALICO RD	6LF	D	6,080	F	6,387	1.05	F	7,465	1.23	
32000	I-75	ALICO RD	DANIELS PKWY	6LF	D	7,080	D	6,478	0.91	F	7,435	1.05	
32100	I-75	DANIELS PKWY	COLONIAL BLVD	6LF	D	6,080	E	6,109	1.00	F	7,187	1.18	
	I-75	COLONIAL BLVD	DR MLK JR BLVD (SR 82)	6LF	D	7,080	C	5,529	0.78	D	6,217	0.88	
32300	I-75	DR MLK JR BLVD (SR 82)	LUCKETT RD	6LF	D	6,080	D	5,756	0.95	F	6,683	1.10	
32400	I-75	LUCKETT RD	SR 80	6LF	D	7,080	C	5,554	0.78	D	6,405	0.90	
32500	I-75	SR 80	SR 78	6LF	D	7,080	B	3,888	0.55	B	4,564	0.64	
32600	I-75	SR 78	COUNTY LINE	6LF	D	6,080	C	3,652	0.60	C	4,164	0.68	
12700	IDLEWILD ST	METRO PKWY	RANCHETTE RD	2LN	E	860	C	213	0.25	C	224	0.26	
13000	IMMOKALEE RD (SR 82)	E OF COLONIAL BLVD	GATEWAY BLVD	6LD	D	2,814	C	2,357	0.84	F	2,957	1.05	
13100	IMMOKALEE RD (SR 82)	GATEWAY BLVD	GUNNERY RD	6LD	D	2,866	C	1,743	0.61	C	2,203	0.77	Timber Creek RPD
13200	IMMOKALEE RD (SR 82)	GUNNERY RD	ALABAMA RD	6LD	D	2,866	C	2,330	0.81	D	2,817	0.98	
13300	IMMOKALEE RD (SR 82)	ALABAMA RD	BELL BLVD	4LD	D	1,942	C	1,002	0.52	C	1,247	0.64	
13400	IMMOKALEE RD (SR 82)	BELL BLVD	COUNTY LINE	4LD	D	1,942	C	770	0.40	C	950	0.49	
13500	IMPERIAL PKWY	COLLIER COUNTY LINE	BONITA BEACH RD	4LD	E	1,920	B	1,605	0.84	B	1,687	0.88	
13550	IMPERIAL PKWY	E TERRY ST	COCONUT RD	4LD	E	1,920	B	1,211	0.63	B	1,273	0.66	City of Bonita Springs/Village of Estero
13600	IONA RD	DAVIS RD	McGREGOR BLVD	2LN	E	860	C	426	0.50	C	468	0.54	Watrous Plantation
13700	ISLAND PARK RD	PARK RD	US 41	2LN	E	860	C	97	0.11	C	158	0.18	Coves of Estero Bay
13800	JOEL BLVD	ALEX GRAHAM BELL BLVD	18TH ST	4LN	E	2,120	B	567	0.27	B	625	0.29	

LEE COUNTY ROAD LINK VOLUMES (County- and State-Maintained Roadways)

Link No.	ROAD NAME	LOCATION		ROAD TYPE	PERFORMANCE STANDARD		2023 100TH HIGHEST HOUR			2028 FUTURE FORECAST*			Notes
		FROM	TO		LOS[1]	CAPACITY[2]	LOS[1]	VOLUME[2]	V/C[3]	LOS[1]	VOLUME[2]	V/C[3]	
13900	JOEL BLVD	18TH ST	SR 80	2LN	E	1,010	D	547	0.54	D	575	0.57	
14000	JOHN MORRIS RD	BUNCHE BEACH	SUMMERLIN RD	2LN	E	860	C	65	0.08	C	68	0.08	[4]
14100	JOHN MORRIS RD	SUMMERLIN RD	IONA RD	2LN	E	860	C	210	0.24	C	221	0.26	
14200	KELLY RD	McGREGOR BLVD	SAN CARLOS BLVD	2LN	E	860	C	230	0.27	C	242	0.28	
14300	KELLY RD	SAN CARLOS BLVD	PINE RIDGE RD	2LN	E	860	C	230	0.27	C	242	0.28	
14500	LAUREL DR	BUS 41	BREEZE DR	2LN	E	860	C	338	0.39	C	355	0.41	
14600	LEE BLVD	SR 82	ALVIN AVE	6LD	E	2,840	E	2,440	0.86	E	2,564	0.90	
14700	LEE BLVD	ALVIN AVE	GUNNERY RD	6LD	E	2,840	E	2,182	0.77	E	2,293	0.81	
14800	LEE BLVD	GUNNERY RD	HOMESTEAD RD	6LD	E	2,840	E	1,944	0.68	E	2,091	0.74	pre-development order res development
14900	LEE BLVD	HOMESTEAD RD	WILLIAMS AVE	4LD	E	1,980	B	913	0.46	B	960	0.48	
14930	LEE BLVD	WILLIAMS AVE	LEELAND HEIGHTS	2LN	E	1,020	B	913	0.90	E	960	0.94	
15000	LEE RD	SAN CARLOS BLVD	ALICO RD	2LN	E	860	C	407	0.47	C	428	0.50	
15100	LEELAND HEIGHTS	HOMESTEAD RD	JOEL BLVD	4LN	E	1,800	B	764	0.42	B	803	0.45	
15200	LEONARD BLVD	GUNNERY RD	WESTGATE BLVD	2LN	E	860	D	714	0.83	F	895	1.04	Fairway Villages/pre-dev order res dev
15300	LITTLETON RD	CORBETT RD	US 41	2LN	E	860	D	587	0.68	D	617	0.72	
15400	LITTLETON RD	US 41	BUS 41	2LN	E	860	D	570	0.66	D	599	0.70	
15500	LUCKETT RD	ORTIZ AVE	I-75	2LN	E	880	C	364	0.41	C	416	0.47	Luckett Landing Hotel/Luckett Road C-Store
15600	LUCKETT RD	I-75	COUNTRY LAKES DR	2LN	E	860	C	320	0.37	C	336	0.39	
15700	MAPLE DR*	SUMMERLIN RD	2ND AVE	2LN	E	860	C	79	0.09	C	83	0.10	[4]
15800	McGREGOR BLVD	SANIBEL T PLAZA	HARBOR DR	4LD	E	1,960	A	980	0.50	B	1,030	0.53	
15900	McGREGOR BLVD	HARBOR DR	SUMMERLIN RD	4LD	E	1,960	B	1,396	0.71	B	1,467	0.75	
16000	McGREGOR BLVD	SUMMERLIN RD	KELLY RD	4LD	E	1,960	A	815	0.42	A	857	0.44	
16100	McGREGOR BLVD	KELLY RD	GLADIOLUS DR	4LD	E	1,960	A	815	0.42	A	857	0.44	
16200	McGREGOR BLVD (SR 867)	OLD McGREGOR /GLADIOLUS DR	IONA LOOP RD	4LD	D	1,942	C	1,542	0.79	C	1,658	0.85	
16300	McGREGOR BLVD (SR 867)	IONA LOOP RD	PINE RIDGE RD	4LD	D	1,942	C	1,542	0.79	C	1,658	0.85	
16400	McGREGOR BLVD (SR 867)	PINE RIDGE RD	CYPRESS LAKE DR	4LD	D	1,900	D	1,810	0.95	F	1,961	1.03	
16500	McGREGOR BLVD (SR 867)	CYPRESS LAKE DR	COLLEGE PKWY	4LD	D	1,900	D	1,810	0.95	F	1,961	1.03	
16600	McGREGOR BLVD (SR 867)	COLLEGE PKWY	WINKLER RD	2LN	D	1,124	C	775	0.69	D	842	0.75	constrained
16700	McGREGOR BLVD (SR 867)	WINKLER RD	TANGLEWOOD BLVD	2LN	D	1,224	D	1,114	0.91	D	1,208	0.99	constrained
16800	McGREGOR BLVD (SR 867)	TANGLEWOOD BLVD	COLONIAL BLVD	2LN	D	1,224	D	1,114	0.91	D	1,208	0.99	constrained
16900	METRO PKWY (SR 739)	SIX MILE PKWY	DANIELS PKWY	6LD	D	2,866	C	1,373	0.48	C	1,618	0.56	
17000	METRO PKWY (SR 739)	DANIELS PKWY	CRYSTAL DR	4LD	D	1,900	C	1,275	0.67	C	1,440	0.76	
17100	METRO PKWY (SR 739)	CRYSTAL DR	DANLEY DR	4LD	D	1,900	D	1,786	0.94	F	2,118	1.11	
17200	METRO PKWY (SR 739)	DANLEY DR	COLONIAL BLVD	4LD	D	1,900	D	1,786	0.94	F	2,118	1.11	
	MICHAEL RIPPE PKWY	US41	SIX MILES PKWY	6LD	D	2,866	C	1,766	0.62	C	2,252	0.79	
17600	MILWAUKEE BLVD	ALABAMA BLVD	BELL BLVD	2LN	E	860	C	171	0.20	C	180	0.21	[4]
17700	MILWAUKEE BLVD	BELL BLVD	COLUMBUS BLVD	2LN	E	860	C	171	0.20	C	213	0.25	[4]
17800	MOODY RD	HANCOCK B. PKWY	PONDELLA RD	2LN	E	860	C	184	0.21	C	193	0.22	[4]
17900	NALLE GRADE RD	SLATER RD	NALLE RD	2LN	E	860	C	82	0.10	C	86	0.10	
18000	NALLE RD	SR 78	NALLE GRADE RD	2LN	E	860	C	136	0.16	C	143	0.17	
18100	NEAL RD	ORANGE RIVER BLVD	BUCKINGHAM RD	2LN	E	860	C	155	0.18	C	163	0.19	
18200	NORTH RIVER RD	SR 31	FRANKLIN LOCK RD	2LN	E	1,140	B	224	0.20	B	344	0.30	The Broadlands
18300	NORTH RIVER RD	FRANKLIN LOCK RD	BROADWAY RD	2LN	E	1,140	B	224	0.20	B	358	0.31	River Run Estates
18400	NORTH RIVER RD	BROADWAY RD	COUNTY LINE	2LN	E	1,140	A	100	0.09	A	135	0.12	
18900	OLGA RD*	SR 80 W	SR 80 E	2LN	E	860	C	84	0.10	C	88	0.10	[4]
19100	ORANGE GROVE BLVD	CLUB ENTR.	HANCOCK B. PKWY	2LN	E	860	C	539	0.63	D	566	0.66	
19200	ORANGE GROVE BLVD	HANCOCK B. PKWY	PONDELLA RD	4LN	E	1,790	C	539	0.30	D	566	0.32	
19300	ORANGE RIVER BLVD	SR 80	STALEY RD	2LN	E	1,000	C	368	0.37	C	387	0.39	

LEE COUNTY ROAD LINK VOLUMES (County- and State-Maintained Roadways)

Link No.	ROAD NAME	LOCATION		ROAD TYPE	PERFORMANCE STANDARD		2023 100TH HIGHEST HOUR			2028 FUTURE FORECAST*			Notes
		FROM	TO		LOS[1]	CAPACITY[2]	LOS[1]	VOLUME[2]	V/C[3]	LOS[1]	VOLUME[2]	V/C[3]	
24300	SR 31 (ARCADIA RD)	SR 78	COUNTY LINE	2LN/4LN	C	730/1942	E	1,068	1.46	B	1,317	0.68	Babcock MPD
24400	STALEY RD	TICE	ORANGE RIVER BLVD	2LN	E	860	C	191	0.22	C	201	0.23	[4]
24500	STRINGFELLOW RD	1ST AVE	BERKSHIRE RD	2LN	E	1,060	B	329	0.31	C	410	0.39	constrained; Tr Cove at Ch Est/Turtle Cy Subd
24600	STRINGFELLOW RD	BERKSHIRE RD	PINE ISLAND RD	2LN	E	1,060	D	651	0.61	D	868	0.82	constrained; Villages of Pine Island
24700	STRINGFELLOW RD	PINE ISLAND RD	PINELAND RD	2LN	E	1,060	D	573	0.54	D	602	0.57	constrained
24800	STRINGFELLOW RD	PINELAND RD	MAIN ST	2LN	E	1,060	D	573	0.54	D	660	0.62	constrained; Bokeelia Harbor Resort
24900	SUMMERLIN RD	McGREGOR BLVD	KELLY COVE RD	4LD	E	1,980	A	1,197	0.60	A	1,258	0.64	unincorporated Lee County
25000	SUMMERLIN RD	KELLY COVE RD	SAN CARLOS BLVD	4LD	E	1,980	A	1,197	0.60	A	1,258	0.64	unincorporated Lee County
25100	SUMMERLIN RD	SAN CARLOS BLVD	PINE RIDGE RD	6LD	E	3,000	A	1,781	0.59	A	1,872	0.62	unincorporated Lee County
25200	SUMMERLIN RD	PINE RIDGE RD	BASS RD	6LD	E	3,000	A	1,781	0.59	A	1,872	0.62	unincorporated Lee County
25300	SUMMERLIN RD	BASS RD	GLADIOLUS DR	6LD	E	3,000	A	1,781	0.59	A	1,872	0.62	unincorporated Lee County
25400	SUMMERLIN RD	GLADIOLUS DR	CYPRESS LAKE DR	4LD	E	1,900	C	1,621	0.85	C	1,704	0.90	unincorporated Lee County
25500	SUMMERLIN RD	CYPRESS LAKE DR	COLLEGE PKWY	6LD	E	2,880	B	1,858	0.65	B	1,953	0.68	unincorporated Lee County
25600	SUMMERLIN RD	COLLEGE PKWY	PARK MEADOW DR	6LD	E	2,880	B	2,022	0.70	B	2,125	0.74	unincorporated Lee County
25700	SUMMERLIN RD	PARK MEADOW DR	BOY SCOUT	6LD	E	2,880	B	2,022	0.70	B	2,125	0.74	unincorporated Lee County
25800	SUMMERLIN RD	BOY SCOUT	MATHEWS DR	4LD	E	1,820	D	1,197	0.66	D	1,258	0.69	
25900	SUMMERLIN RD	MATHEWS DR	COLONIAL BLVD	4LD	E	1,820	D	1,197	0.66	D	1,258	0.69	
26000	SUNRISE BLVD	BELL BLVD	COLUMBUS BLVD	2LN	E	860	C	45	0.05	C	53	0.06	[4]
26100	SUNSHINE BLVD	SR 82	23RD ST SW	2LN	E	1,010	D	544	0.54	D	572	0.57	
26150	SUNSHINE BLVD	23RD ST SW	LEE BLVD	2LN	E	1,010	D	544	0.54	D	637	0.63	pre-development order res development
26200	SUNSHINE BLVD	LEE BLVD	W 12TH ST	2LN	E	1,010	E	738	0.73	E	839	0.83	pre-development order res development
26300	SUNSHINE BLVD	W 12TH ST	W 75TH ST	2LN	E	860	E	738	0.86	F	863	1.00	pre-development order res development
26500	THREE OAKS PKWY	COCONUT RD	ESTERO PKWY	4LD	E	1,940	B	1,368	0.71	B	1,438	0.74	
26600	THREE OAKS PKWY	ESTERO PKWY	SAN CARLOS BLVD	4LD	E	1,940	B	806	0.42	B	926	0.48	Villages of San Carlos DRI (Portofino Vineyards)
26700	THREE OAKS PKWY	SAN CARLOS BLVD	ALICO RD	4LD	E	1,940	E	806	0.42	B	1,210	0.62	Alico Interchange Park DRI
26800	TICE ST	SR 80	ORTIZ AVE	2LN	E	860	C	234	0.27	C	247	0.29	
26900	TICE ST	ORTIZ AVE	STALEY RD	2LN	E	860	C	234	0.27	C	248	0.29	
27000	TREELINE AVE	TERMIMAL ACCESS RD	DANIELS PKWY	4LD	E	1,980	A	1,033	0.52	A	1,162	0.59	[4]; unincorporated Lee County; Treeline ACP IPD
27030	TREELINE AVE	DANIELS PKWY	AMBERWOOD RD	4LD	E	1,980	A	946	0.48	A	994	0.50	
27070	TREELINE AVE	AMBERWOOD RD	COLONIAL BLVD	4LD	E	1,980	A	946	0.48	A	994	0.50	
29800	US 41 (S TAMIAMI TR)	OLD 41	CORKSCREW RD	6LD	D	2,814	D	2,808	1.00	F	3,044	1.08	
29900	US 41 (S TAMIAMI TR)	CORKSCREW RD	SANIBEL BLVD	6LD	D	2,814	D	2,542	0.90	F	2,960	1.05	
30000	US 41 (S TAMIAMI TR)	SANIBEL BLVD	ALICO RD	6LD	D	2,814	D	2,801	1.00	F	3,191	1.13	
30100	US 41 (S TAMIAMI TR)	ALICO RD	ISLAND PARK RD	6LD	D	2,814	D	2,801	1.00	F	3,191	1.13	Island Park Commercial Center
30200	US 41 (S TAMIAMI TR)	ISLAND PARK RD	BRIARCLIFF RD	6LD	D	2,814	F	3,306	1.17	F	3,582	1.27	
30300	US 41 (S TAMIAMI TR)	BRIARCLIFF RD	SIX MILE PKWY	6LD	D	2,814	F	3,306	1.17	F	3,582	1.27	
30400	US 41 (S TAMIAMI TR)	SIX MILE PKWY	DANIELS PKWY	6LD	D	2,814	D	2,590	0.92	D	2,807	1.00	
30500	US 41 (CLEVELAND AVE)	DANIELS PKWY	COLLEGE PKWY	6LD	D	2,814	F	2,842	1.01	F	3,082	1.10	SR 739 6-ln design/right-of-way programmed
30600	US 41 (CLEVELAND AVE)	COLLEGE PKWY	SOUTH AIRPORT RD	6LD	D	2,814	F	2,842	1.01	F	3,082	1.10	SR 739 6-ln design/right-of-way programmed
30700	US 41 (CLEVELAND AVE)	SOUTH AIRPORT RD	BOY SCOUT RD	6LD	D	2,814	D	2,615	0.93	F	2,835	1.01	SR 739 6-ln design/right-of-way programmed
30800	US 41 (CLEVELAND AVE)	BOY SCOUT RD	NORTH AIRPORT RD	6LD	D	2,814	D	2,615	0.93	F	2,835	1.01	SR 739 6-ln design/right-of-way programmed
30810	US 41 (CLEVELAND AVE)	NORTH AIRPORT RD	COLONIAL BLVD	6LD	D	2,814	D	2,615	0.93	F	2,835	1.01	
30900	US 41 (CLEVELAND AVE)	CITY LIMITS	N. KEY DR	4LD	D	1,900	F	2,126	1.12	F	2,302	1.21	
31000	US 41 (CLEVELAND AVE)	N. KEY DR	HANCOCK B. PKWY	4LD	D	1,900	F	2,126	1.12	F	2,302	1.21	
31100	US 41 (CLEVELAND AVE)	HANCOCK B. PKWY	PONDELLA RD	4LD	D	1,900	F	2,126	1.12	F	2,302	1.21	
31200	US 41 (CLEVELAND AVE)	PONDELLA RD	SR 78	4LD	D	1,900	C	1,490	0.78	D	1,616	0.85	
31300	US 41 (CLEVELAND AVE)	SR 78	LITTLETON RD	4LD	D	1,942	C	1,490	0.77	C	1,616	0.83	Diplomat Property RPD/CPD; Merch Crssng DRI
31400	US 41 (N TAMIAMI TR)	LITTLETON RD	BUS 41	4LD	D	1,942	C	1,427	0.73	C	1,620	0.83	Coral Bay (aka Estates at Entrada RPD/CPD)

LEE COUNTY ROAD LINK VOLUMES (County- and State-Maintained Roadways)

Link No.	ROAD NAME	LOCATION		ROAD TYPE	PERFORMANCE STANDARD		2023 100TH HIGHEST HOUR			2028 FUTURE FORECAST*			Notes
		FROM	TO		LOS[1]	CAPACITY[2]	LOS[1]	VOLUME[2]	V/C[3]	LOS[1]	VOLUME[2]	V/C[3]	
31500	US 41 (N TAMIAMI TR)	BUS 41	DEL PRADO BLVD	4LD	D	1,900	D	1,888	0.99	F	2,148	1.13	
31600	US 41 (N TAMIAMI TR)	DEL PRADO BLVD	CHARLOTTE CO. LINE	4LD	D	2,910	B	1,186	0.41	B	1,416	0.49	Tara Woods Phase III B, D & E Expansion
27200	VETERANS MEM. PKWY	SR 78	CHIQUITA	4LD	D	2,040	A	927	0.45	A	974	0.48	partially located in City of Cape Coral
27300	VETERANS MEM. PKWY	CHIQUITA	SKYLINE	4LD	D	2,040	B	1,453	0.71	B	1,527	0.75	City of Cape Coral
27400	VETERANS MEM. PKWY	SKYLINE	SANTA BARBARA BLVD	6LD	D	3,080	B	2,518	0.82	B	2,646	0.86	[4]; City of Cape Coral
27500	VETERANS MEM. PKWY	SANTA BARBARA BLVD	COUNTRY CLUB BLVD	6LD	D	3,080	F	3,084	1.00	F	3,241	1.05	City of Cape Coral
27600	VETERANS MEM. PKWY	COUNTRY CLUB BLVD	MIDPOINT BRDG TOLL P	6LD	D	3,080	F	3,317	1.08	F	3,486	1.13	City of Cape Coral
27700	VETERANS MEM. PKWY	MIDPOINT BRDG TOLL P	McGREGOR BLVD	4LB	D	4,000	D	2,937	0.73	D	3,087	0.77	City of Fort Myers
29000	W 6TH ST	WILLIAMS AVE	JOEL BLVD	2LN	E	860	C	188	0.22	C	202	0.23	
29100	W 12TH ST	GUNNERY RD	SUNSHINE BLVD	2LN	E	860	C	299	0.35	C	314	0.37	[4]
29200	W 12TH ST	SUNSHINE BLVD	WILLIAMS AVE	2LN	E	860	C	91	0.11	C	105	0.12	old count projection (2010)
29300	W 12TH ST	WILLIAMS AVE	JOEL BLVD	2LN	E	860	C	110	0.13	C	116	0.13	old count projection (2010)
29400	W 14TH ST	SUNSHINE BLVD	RICHMOND AVE	2LN	E	860	C	57	0.07	C	60	0.07	old count projection (2010)
26400	SW 23RD ST	GUNNERY RD	SUNSHINE BLVD	2LN	E	860	D	714	0.83	F	893	1.04	[4]; Ibis Landing (a.k.a. Copperhead Glf Comm)
15200	WESTGATE BLVD	GUNNERY RD	LEE BLVD	2LN	E	860	C	492	0.57	C	642	0.75	pre-development order res development
27900	WHISKEY CREEK DR	COLLEGE PKWY	SAUTERN DR	2LD	E	910	C	308	0.34	C	324	0.36	
28000	WHISKEY CREEK DR	SAUTERN DR	McGREGOR BLVD	2LD	E	910	C	308	0.34	C	324	0.36	
28200	WILLIAMS AVE	LEE BLVD	W. 6TH ST	2LN	E	860	D	677	0.79	D	714	0.83	Carlton Park
28300	WINKLER RD	STOCKBRIDGE DR	SUMMERLIN RD	2LN	E	860	C	465	0.54	C	489	0.57	[4]
28400	WINKLER RD	SUMMERLIN RD	GLADIOLUS DR	4LD	E	1,520	C	321	0.21	C	337	0.22	
28500	WINKLER RD	GLADIOLUS DR	BRANDYWINE CIR	2LN	E	880	B	518	0.59	B	544	0.62	
28600	WINKLER RD	BRANDYWINE CIR	CYPRESS LAKE DR	2LN	E	880	B	518	0.59	B	544	0.62	
28700	WINKLER RD	CYPRESS LAKE DR	COLLEGE PKWY	4LD	E	1,780	D	703	0.39	D	739	0.42	
28800	WINKLER RD	COLLEGE PKWY	McGREGOR BLVD	2LN	E	800	B	425	0.53	B	447	0.56	
28900	WOODLAND BLVD	US 41	AUSTIN ST	2LN	E	860	C	272	0.32	C	286	0.33	[4]

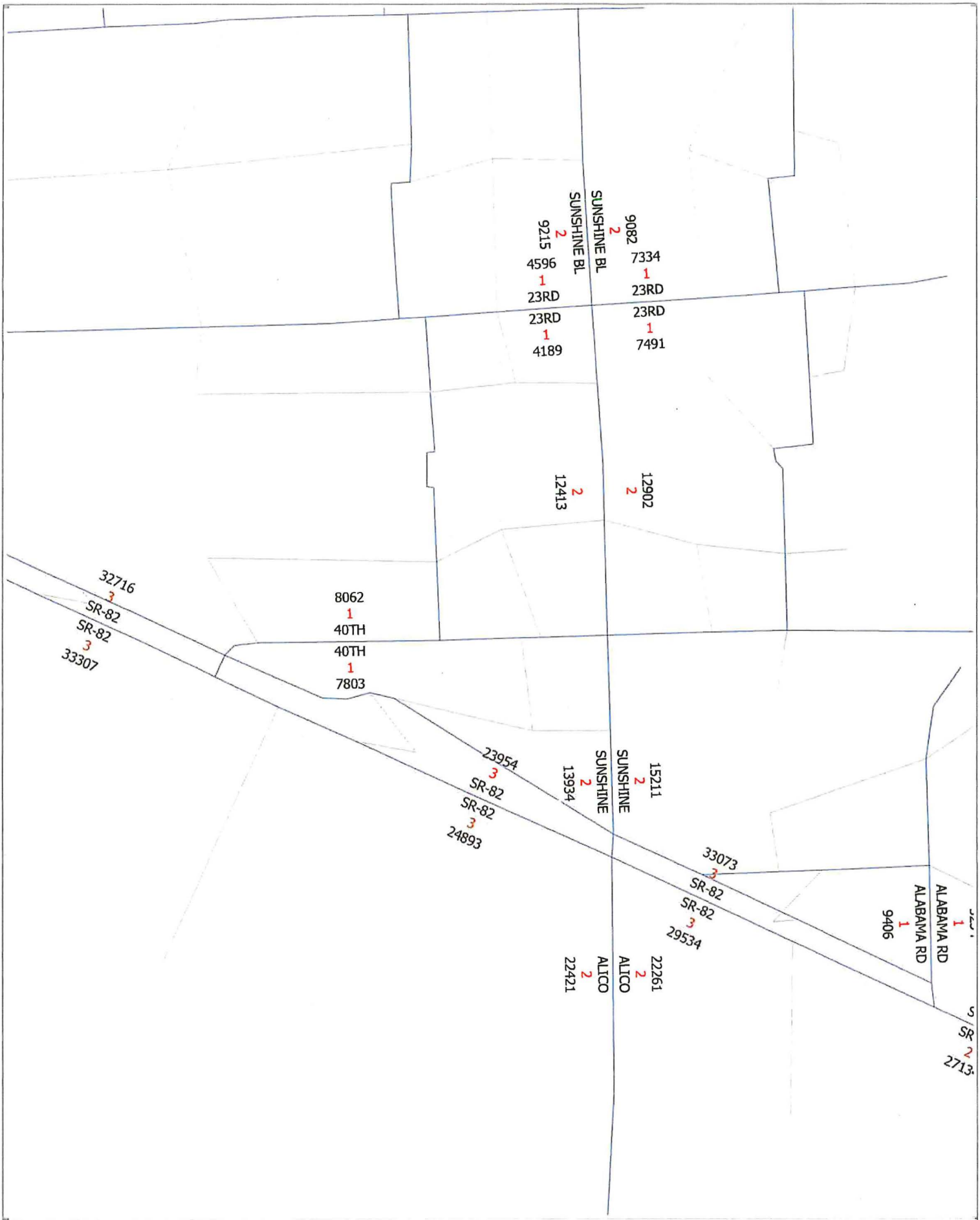
[1] level of service; [2] directional; vehicles/hour; [3] directional volume-to-capacity ratio; [4] previous years data; [5] EEPCO Study

*Future forecast on State maintained facilities are Year 2029 forecast

- County-Maintained Collector Roadway - Unincorporated Lee County
- County-Maintained Collector Roadway - Incorporated Lee County
- County-Maintained Arterial Roadway - Unincorporated Lee County
- County-Maintained Arterial Roadway - Incorporated Lee County
- County-Maintained Controlled Access Arterial Facility
- County-Maintained Expressway
- State-Maintained Arterial Roadway - Unincorporated Lee County

Revised : December 13, 2024

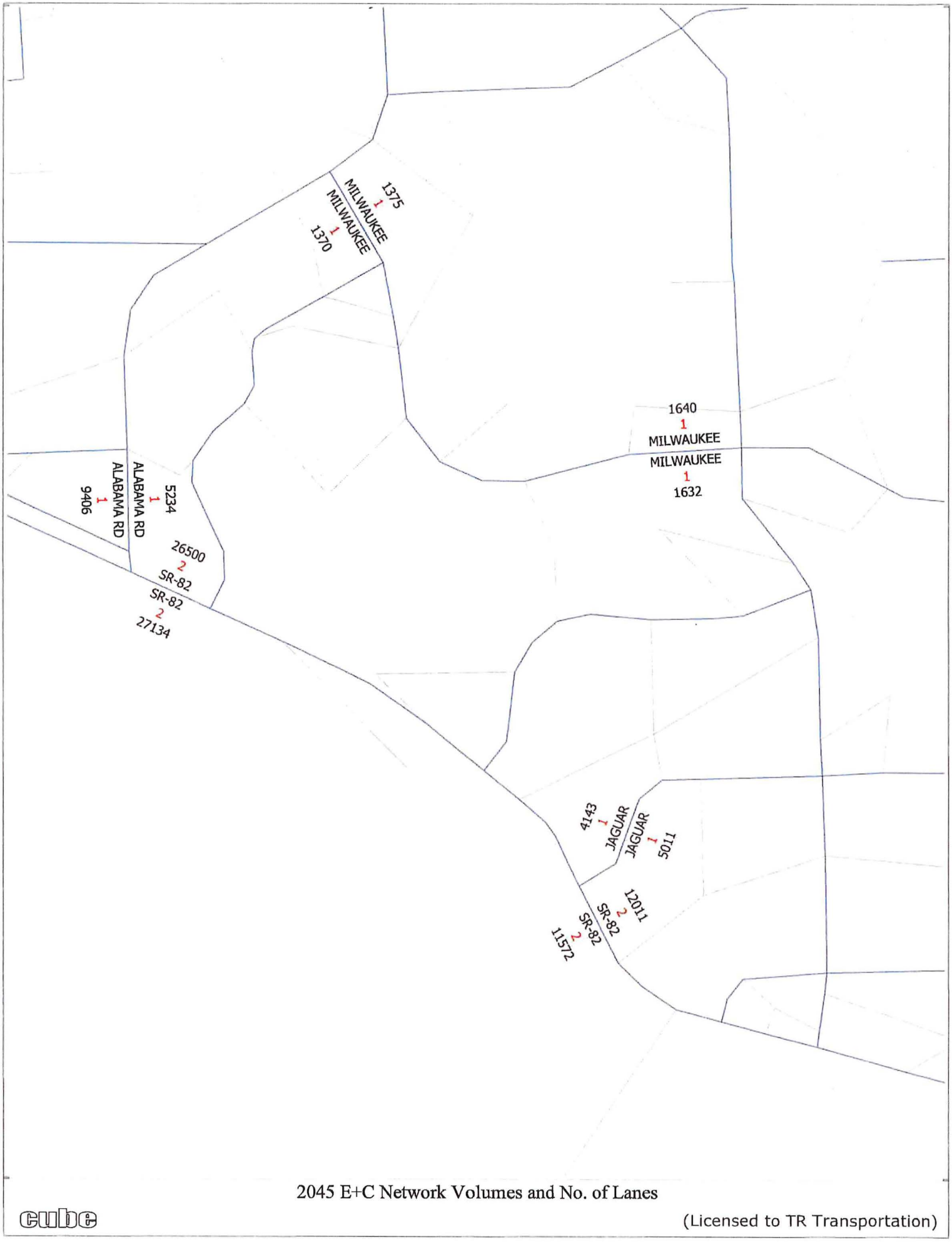
2045 E+C NETWORK VOLUMES



2045 E+C Network Volumes and No. of Lanes

cube

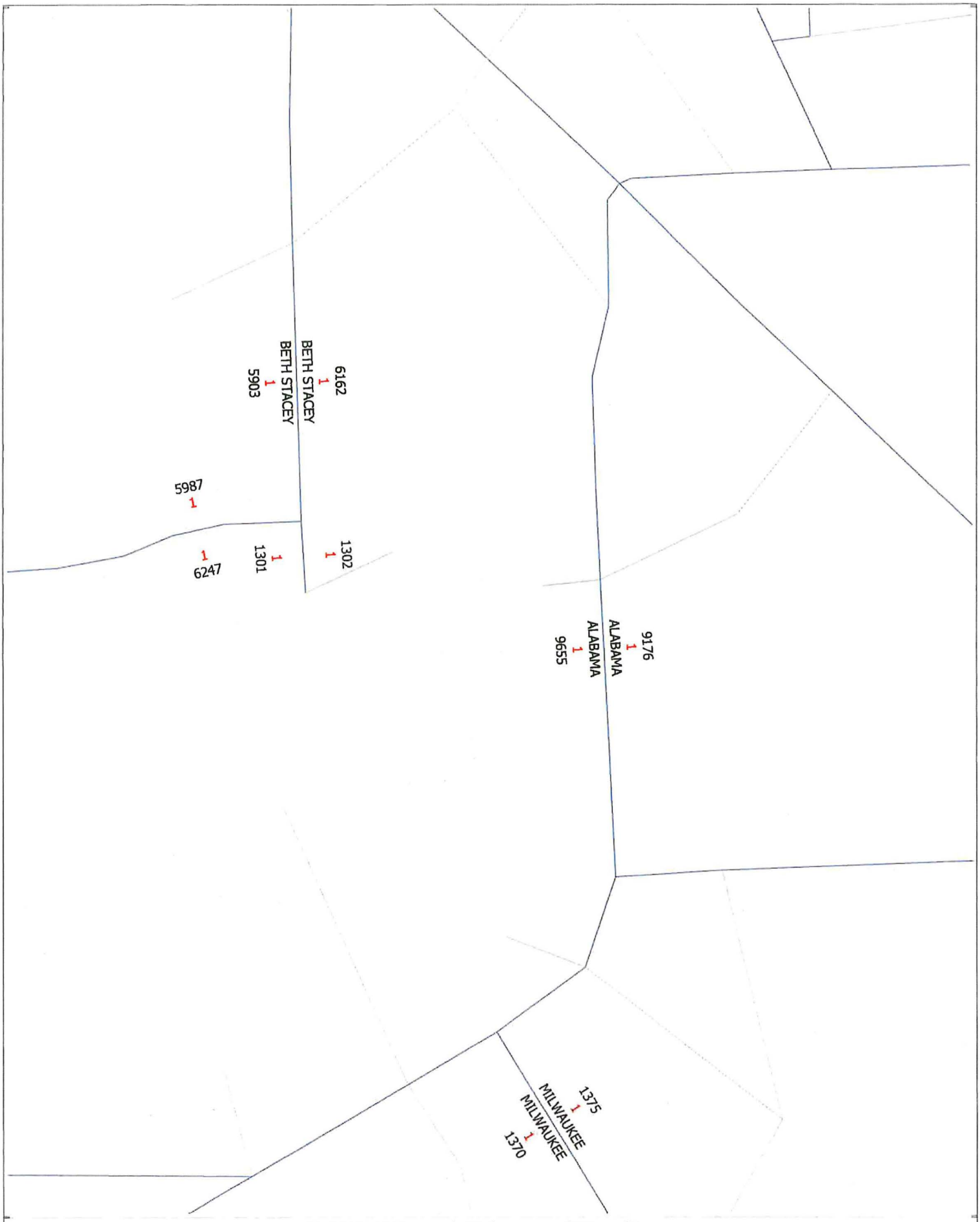
(Licensed to TR Transportation)



2045 E+C Network Volumes and No. of Lanes

cube

(Licensed to TR Transportation)

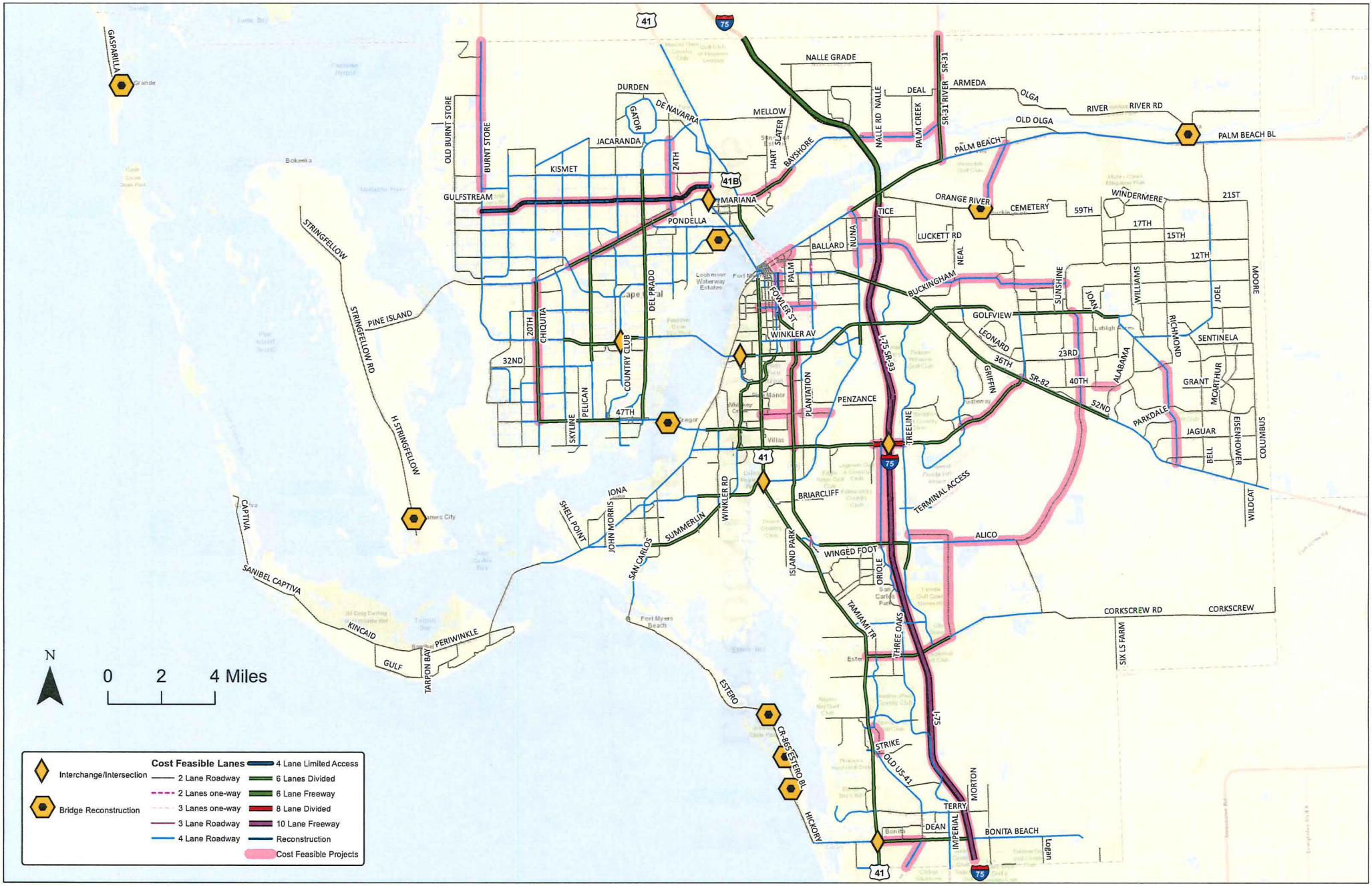


2045 E+C Network Volumes and No. of Lanes

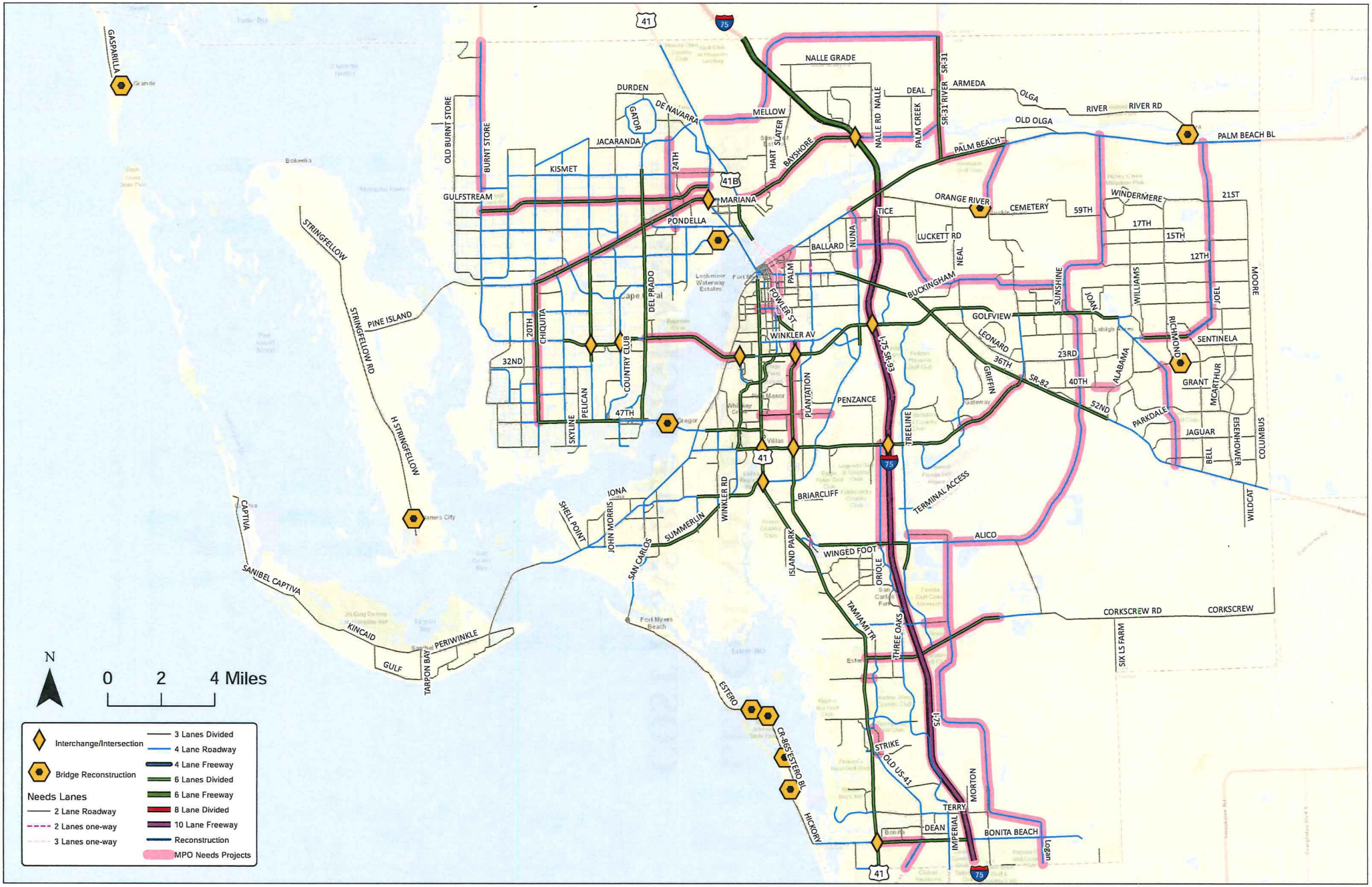
cube

(Licensed to TR Transportation)

LEE COUNTY MPO 2045 COST FEASIBLE HIGHWAY PLAN

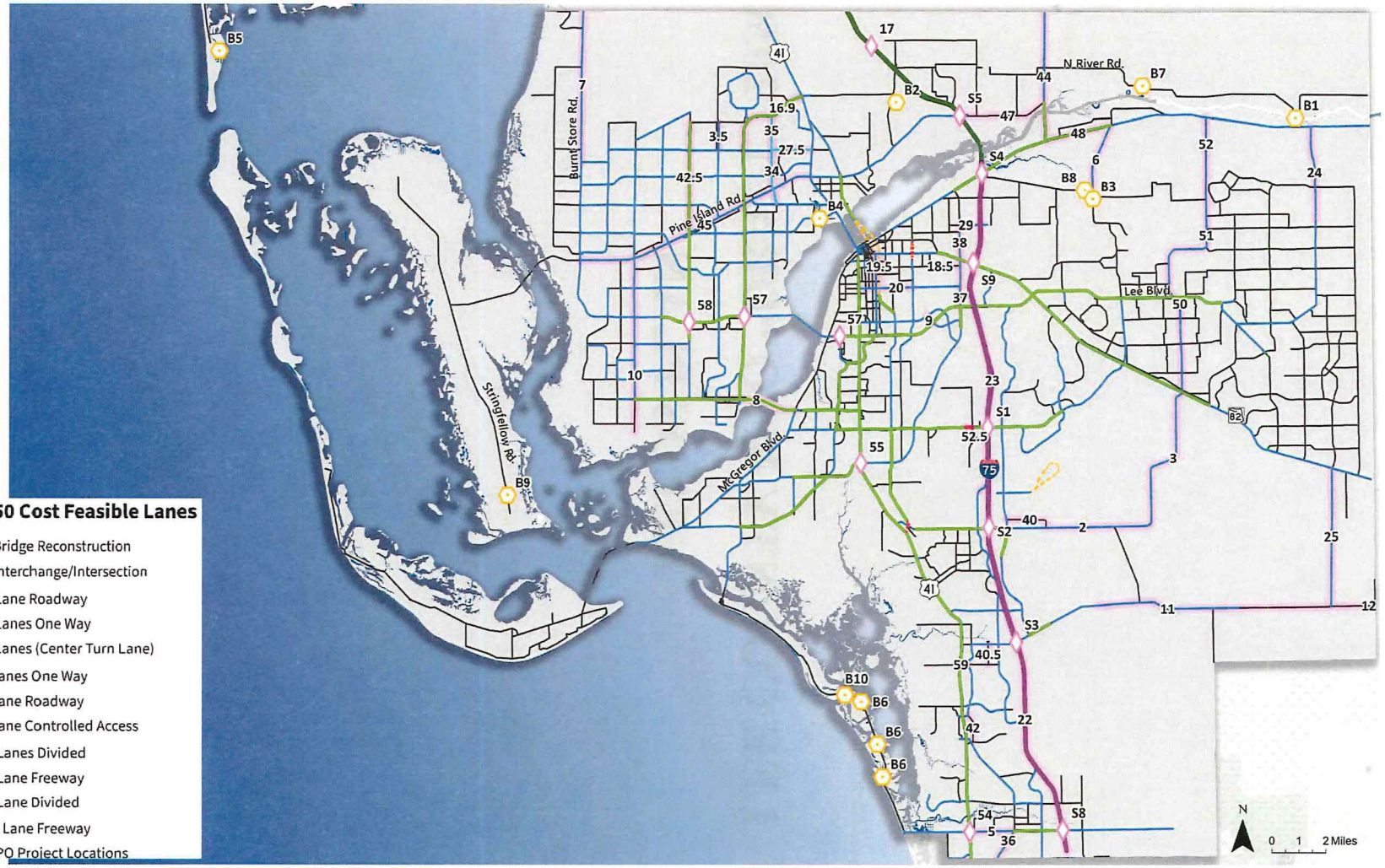

N
0 2 4 Miles
Interchange/Intersection
Bridge Reconstruction
Cost Feasible Lanes
2 Lane Roadway
2 Lanes one-way
3 Lanes one-way
3 Lane Roadway
4 Lane Roadway
4 Lane Limited Access
6 Lanes Divided
6 Lane Freeway
8 Lane Divided
10 Lane Freeway
Reconstruction
Cost Feasible Projects
GASPARILLA
NALLE GRADE
DURDEN
DE NAVARRA
GATOR
MELLOW
JACARANDA
KISMET
GULFSTREAM
MARIANA
PONDELLA
OLD BURNT STORE
BURNT STORE
STRINGFELLOW
STRINGFELLOW RD
PINE ISLAND
H STRINGFELLOW
CAPTIVA
SANIBEL CAPTIVA
KINCAID
GULF
PERIWINKLE
TARPON BAY
20TH
CHIQUITA
32ND
COUNTRY CLUB
DEL PRADO
24TH
47TH
SKYLINE
PELICAN
HART
SLATER
BAYSHORE
NALLE RD
DEAL
PALM CREEK
SR-31
SR-31 RIVER
ARMEDA
OLGA
RIVER
RIVER RD
OLD OLGA
PALM BEACH
PALM BEACH BL
ORANGE RIVER
CEMETERY
TICE
BALLARD
NUNA
PALM
FOWLER ST
WINKLER AV
LUCKETT RD
NEAL
BUCKINGHAM
GOLFVIEW
LEONARD
36TH
GRIFFIN
PLANTATION
PENZANCE
TREELINE
I-75 SR-93
SR-82
40TH
52ND
23RD
ALABAMA
SUNSHINE
JOAN
WILLIAMS
JOEL
RICHMOND
SENTINELA
GRANT
MCARTHUR
EISENHOWER
BELL
JAGUAR
PARKDALE
COLUMBUS
WILDCAT
MOORE
WINDERMERE
59TH
17TH
15TH
12TH
21ST
IONA
JOHN MORRIS
SHELL POINT
SUMMERLIN
WINKLER RD
SAN CARLOS
ISLAND PARK
BRIARCLIFF
TERMINAL ACCESS
ALICO
WINGED FOOT
ORIOLE
TAMIAMI TR
THREE OAKS
CORKSCREW RD
CORKSCREW
SIX LS FARM
ESTERO
CR-865 ESTERO BL
HICKORY
I-75
STRIKE
OLD US-41
TERRY
MORTON
DEAN
IMPERIAL
BONITA BEACH
Logan
41
41B
75

LEE COUNTY MPO 2045 NEEDS PLAN


N
0 2 4 Miles
Interchange/Intersection
Bridge Reconstruction
Needs Lanes
2 Lane Roadway
2 Lanes one-way
3 Lanes one-way
3 Lanes Divided
4 Lane Roadway
4 Lane Freeway
6 Lanes Divided
6 Lane Freeway
8 Lane Divided
10 Lane Freeway
Reconstruction
MPO Needs Projects
GASPARILLA
Grande
Bokeelia
STRINGFELLOW
PINE ISLAND
STRINGFELLOW RD
H STRINGFELLOW
James City
CAPTIVA
SANIBEL CAPTIVA
KINCAID
GULF
PERIWINKLE
TARPON BAY
OLD BURNT STORE
BURNT STORE
GULFSTREAM
KISMET
JACARANDA
DURDEN
GATOR
DE NAVARRA
MELLOW
HART
SLATER
BAYSHORE
24TH
41B
MARIANA
PONDELLA
20TH
CHIQUITA
DEL PRADO
COUNTRY CLUB
32ND
47TH
SKYLINE
PELICAN
NALLE GRADE
NALLE RD
DEAL
PALM CREEK
SR-31
SR-31 RIVER
ARMEDA
OLGA
RIVER
RIVER RD
OLD OLGA
PALM BEACH
PALM BEACH BL
ORANGE RIVER
CEMETERY
59TH
WINDERMERE
21ST
17TH
15TH
12TH
TICE
LUCKETT RD
BALLARD
NUNA
NEAL
PALM
FOWLER ST
WINKLER AV
BUCKINGHAM
SUNSHINE
JOAN
WILLIAMS
JOEL
MOORE
GOLFVIEW
LEONARD
36TH
23RD
ALABAMA
RICHMOND
SENTINELA
GRANT
MCARTHUR
EISENHOWER
COLUMBUS
WILDCAT
SR-82
40TH
52ND
PARKDALE
JAGUAR
BELL
I-75/SR-93
PLANTATION
PENZANCE
GRIFFIN
TREELINE
TERMINAL ACCESS
BRIARCLIFF
ALICO
WINGED FOOT
ORIOLE
TAMIAMI TR
THREE OAKS
CORKSCREW RD
CORKSCREW
SIX LS FARM
IONA
JOHN MORRIS
SHELL POINT
SUMMERLIN
WINKLER RD
SAN CARLOS
ISLAND PARK
ESTERO
CR-865/ESTERO BL
HICKORY
STRIKE
OLD US-41
TERRY
DEAN
IMPERIAL
MORTON
BONITA BEACH
Logan
I-75
41
75

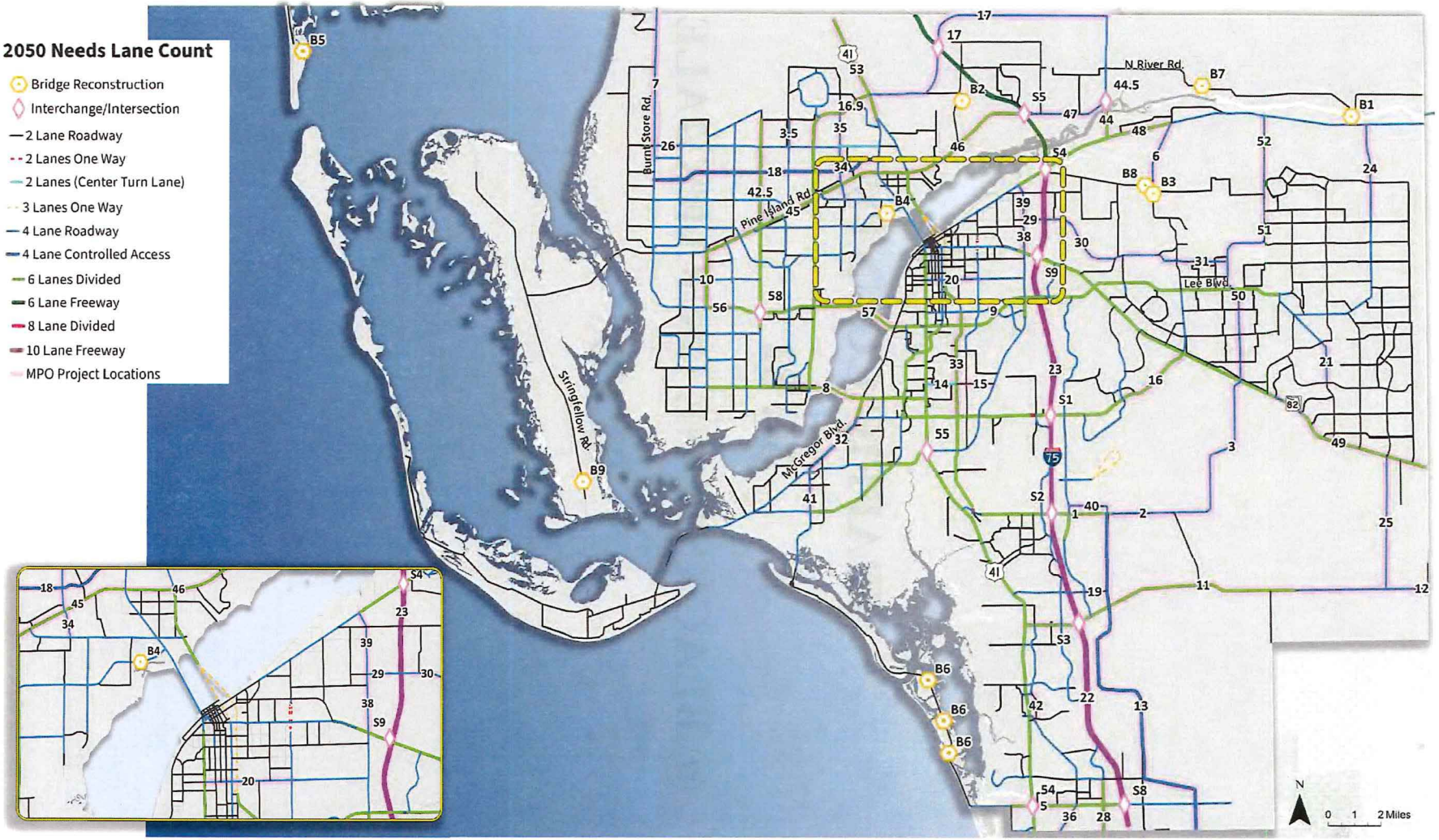
LEE COUNTY MPO "DRAFT" 2050
COST FEASIBLE HIGHWAY PLAN

Figure 4-2: 2050 Cost Feasible Roadway Projects



LEE COUNTY MPO "DRAFT" 2050 NEEDS PLAN

Figure 3-10: 2050 Roadway Needs



2050 Transportation

TRAFFIC COUNTS

SR 82

@ BLACKSTONE DR/PARKDALE BLVD

SR 82 @ Blackstone Dr
Fort Myers Florida
Wednesday, December 11, 2024

	Southbound Parkdale Blvd						Westbound SR 82						Northbound Blackstone Dr						Eastbound SR 82						VEHICLE TOTAL
Time	U Turns	Left Turns	Straight Through	Right Turns	Crosswalk Crossings	*Vehicle Approach Total*	U Turns	Left Turns	Straight Through	Right Turns	Crosswalk Crossings	*Vehicle Approach Total*	U Turns	Left Turns	Straight Through	Right Turns	Crosswalk Crossings	*Vehicle Approach Total*	U Turns	Left Turns	Straight Through	Right Turns	Crosswalk Crossings	*Vehicle Approach Total*	
7:00 AM	0	2	1	43	0	*46*	0	1	222	1	0	*224*	0	13	4	7	0	*24*	0	42	173	2	0	*217*	**511**
7:15 AM	0	1	0	36	0	*37*	0	2	241	0	0	*243*	0	21	11	5	0	*37*	0	31	175	1	0	*207*	**524**
7:30 AM	0	2	5	55	0	*62*	1	0	203	2	0	*206*	0	17	6	0	0	*23*	0	28	145	1	0	*174*	**465**
7:45 AM	0	2	5	61	0	*68*	0	1	189	1	0	*191*	0	15	1	2	0	*18*	0	21	168	4	0	*193*	**470**
Hourly Total	0	7	11	195	0	*213*	1	4	855	4	0	*864*	0	66	22	14	0	*102*	0	122	661	8	0	*791*	**1970**
8:00 AM	0	2	4	64	0	*70*	1	1	178	3	0	*183*	0	9	3	6	0	*18*	0	29	121	4	0	*154*	**425**
8:15 AM	0	1	2	43	0	*46*	0	0	194	1	0	*195*	0	7	1	2	0	*10*	0	19	165	1	0	*185*	**436**
8:30 AM	0	0	2	27	0	*29*	0	1	193	0	0	*194*	0	5	1	2	0	*8*	0	26	142	4	0	*172*	**403**
8:45 AM	0	0	2	27	0	*29*	0	2	174	1	0	*177*	0	6	2	2	0	*10*	0	22	155	1	0	*178*	**394**
Hourly Total	0	3	10	161	0	*174*	1	4	739	5	0	*749*	0	27	7	12	0	*46*	0	96	583	10	0	*689*	**1658**
9:00 AM	0	0	3	26	0	*29*	1	1	169	2	0	*173*	0	6	1	1	0	*8*	0	14	160	1	0	*175*	**385**
9:15 AM	0	3	0	23	0	*26*	0	1	186	0	0	*187*	0	7	4	0	0	*11*	1	17	156	2	0	*176*	**400**
9:30 AM	0	0	2	41	0	*43*	0	3	169	0	0	*172*	0	7	2	0	0	*9*	0	16	145	0	0	*161*	**385**
9:45 AM	0	1	1	35	0	*37*	0	0	158	2	0	*160*	0	5	2	0	1	*7*	0	13	166	5	0	*184*	**388**
Hourly Total	0	4	6	125	0	*135*	1	5	682	4	0	*692*	0	25	9	1	1	*35*	1	60	627	8	0	*696*	**1558**
10:00 AM	0	2	1	20	0	*23*	1	2	156	2	0	*161*	0	3	2	1	0	*6*	0	21	149	3	0	*173*	**363**
10:15 AM	0	0	1	31	0	*32*	0	0	166	0	0	*166*	0	2	2	0	2	*4*	0	21	130	3	0	*154*	**356**
10:30 AM	0	1	2	28	0	*31*	0	1	158	2	0	*161*	0	10	1	3	0	*14*	0	24	123	6	0	*153*	**359**
10:45 AM	0	1	0	23	0	*24*	0	0	137	1	0	*138*	0	3	0	1	0	*4*	0	19	128	3	0	*150*	**316**
Hourly Total	0	4	4	102	0	*110*	1	3	617	5	0	*626*	0	18	5	5	2	*28*	0	85	530	15	0	*630*	**1394**
11:00 AM	0	1	0	28	0	*29*	0	0	174	2	0	*176*	0	10	0	1	0	*11*	0	20	133	0	0	*153*	**369**
11:15 AM	0	0	1	23	1	*24*	0	1	144	0	0	*145*	0	7	0	1	0	*8*	0	16	151	4	0	*171*	**348**
11:30 AM	0	0	2	31	0	*33*	0	0	144	1	0	*145*	0	5	0	2	1	*7*	0	21	145	3	0	*169*	**354**
11:45 AM	0	1	1	16	0	*18*	0	1	130	1	0	*132*	0	3	1	2	0	*6*	0	11	141	3	0	*155*	**311**
Hourly Total	0	2	4	98	1	*104*	0	2	592	4	0	*598*	0	25	1	6	1	*32*	0	68	570	10	0	*648*	**1382**
12:00 PM	0	1	2	20	0	*23*	0	0	159	0	0	*159*	0	5	2	0	0	*7*	0	18	136	2	0	*156*	**345**
12:15 PM	0	0	0	34	0	*34*	0	1	159	1	0	*161*	0	2	0	0	0	*2*	0	19	131	7	0	*157*	**354**
12:30 PM	0	1	2	25	0	*28*	0	0	164	3	0	*167*	0	4	2	0	0	*6*	0	18	155	5	0	*178*	**379**
12:45 PM	0	0	1	20	0	*21*	0	0	154	3	0	*157*	0	2	1	1	0	*4*	0	22	151	3	0	*176*	**358**
Hourly Total	0	2	5	99	0	*106*	0	1	636	7	0	*644*	0	13	5	1	0	*19*	0	77	573	17	0	*667*	**1436**
1:00 PM	0	1	2	27	0	*30*	0	2	127	2	0	*131*	0	5	3	1	0	*9*	1	34	175	5	0	*215*	**385**
1:15 PM	0	1	0	11	6	*12*	0	1	181	1	0	*183*	0	3	5	3	0	*11*	0	31	184	2	0	*217*	**423**
1:30 PM	0	2	0	26	0	*28*	0	1	183	1	0	*185*	0	5	3	2	1	*10*	0	38	152	3	0	*193*	**416**
1:45 PM	0	3	3	21	0	*27*	0	3	174	3	0	*180*	0	4	1	2	0	*7*	0	38	165	5	0	*208*	**422**
Hourly Total	0	7	5	85	6	*97*	0	7	665	7	0	*679*	0	17	12	8	1	*37*	1	141	676	15	0	*833*	**1646**
2:00 PM	0	0	3	31	0	*34*	1	3	161	0	0	*165*	0	5	2	0	0	*7*	0	44	169	1	0	*214*	**420**
2:15 PM	0	0	3	38	0	*41*	0	2	162	2	0	*166*	0	6	5	2	0	*13*	0	41	158	0	0	*199*	**419**
2:30 PM	0	0	5	32	0	*37*	0	1	197	1	0	*199*	0	5	3	3	0	*11*	0	46	193	6	0	*245*	**492**
2:45 PM	0	2	5	42	0	*49*	0	2	185	3	0	*190*	0	5	4	2	0	*11*	0	49	199	10	0	*258*	**508**
Hourly Total	0	2	16	143	0	*161*	1	8	705	6	0	*720*	0	21	14	7	0	*42*	0	180	719	17	0	*916*	**1839**
3:00 PM	0	1	9	30	0	*40*	0	4	183	0	0	*187*	0	9	2	3	0	*14*	0	44	218	5	0	*267*	**508**
3:15 PM	0	0	3	30	0	*33*	0	3	190	0	0	*193*	0	4	0	2	0	*6*	1	65	227	2	0	*295*	**527**
3:30 PM	0	0	2	29	0	*31*	0	2	163	1	0	*166*	0	1	1	2	0	*4*	0	58	190	7	0	*255*	**456**
3:45 PM	0	1	2	38	0	*41*	0	1	199	2	0	*202*	0	7	0	2	0	*9*	0	65	239	3	0	*307*	**559**
Hourly Total	0	2	16	127	0	*145*	0	10	735	3	0	*748*	0	21	3	9	0	*33*	1	232	874	17	0	*1124*	**2050**
4:00 PM	0	0	3	33	0	*36*	0	2	224	0	0	*226*	0	6	2	8	0	*16*	0	64	239	8	0	*311*	**589**
4:15 PM	0	0	4	27	0	*31*	0	5	224	3	0	*232*	0	2	2	3	0	*7*	0	71	222	5	0	*298*	**568**
4:30 PM	0	0	3	37	0	*40*	0	5	201	3	0	*209*	0	5	4	2	0	*11*	0	79	245	9	0	*333*	**593**
4:45 PM	0	0	3	26	0	*29*	0	5	193	0	0	*198*	0	6	0	3	0	*9*	0	79	250	7	0	*336*	**572**
Hourly Total	0	0	13	123	0	*136*	0	17	842	6	0	*865*	0	19	8	16	0	*43*	0	293	956	29	0	*1278*	**2322**
5:00 PM	0	0	3	33	0	*36*	0	3	189	0	0	*192*	0	3	3	6	0	*12*	0	65	271	6	0	*342*	**582**
5:15 PM	0	0	1	24	0	*25*	0	5	190	0	0	*195*	0	7	3	1	0	*11*	0	85	280	9	0	*374*	**605**
5:30 PM	0	0	5	25	0	*30*	0	2	170	1	0	*173*	0	7	4	0	0	*11*	1	84	292	13	0	*390*	**604**
5:45 PM	0	0	3	23	0	*26*	0	7	174	1	0	*182*	0	6	2	3	0	*11*	0	68	248	5	0	*321*	**540**
Hourly Total	0	0	12	105	0	*117*	0	17	723	2	0	*742*	0	23	12	10	0	*45*	1	302	1091	33	0	*1427*	**2331**

6:00 PM	1	0	5	27	0	*33*	0	4	172	0	0	*176*	0	10	0	1	0	*11*	0	77	260	4	0	*341*	**561**
6:15 PM	0	1	3	22	0	*26*	0	3	164	3	0	*170*	0	8	2	0	0	*10*	0	57	245	9	0	*311*	**517**
6:30 PM	0	0	0	22	0	*22*	0	1	176	3	0	*180*	0	7	1	3	0	*11*	0	52	201	7	0	*260*	**473**
6:45 PM	0	0	2	20	0	*22*	0	4	149	1	0	*154*	0	5	2	1	0	*8*	0	55	181	5	0	*241*	**425**
Hourly Total	1	1	10	91	0	*103*	0	12	661	7	0	*680*	0	30	5	5	0	*40*	0	241	887	25	0	*1153*	**1976**
TOTAL	**1**	**34**	**112**	**1454**	**7**	***1601***	**5**	**90**	**8452**	**60**	**0**	***8607***	**0**	**305**	**103**	**94**	**5**	***502***	**4**	**1897**	**8747**	**204**	**0**	***10852***	**21562**
Cars	1	15	108	1407	0	*1531*	5	83	7239	38	0	*7365*	0	293	99	84	1	*476*	4	1829	7582	192	0	*9607*	**18979**
Heavy Vehicles	0	19	4	47	7	*70*	0	7	1213	22	0	*1242*	0	12	4	10	4	*26*	0	68	1165	12	0	*1245*	**2583**
Heavy Vehicle %	0.00%	55.88%	3.57%	3.23%	100.00%	*4.37%*	0.00%	7.78%	14.35%	36.67%	0.00%	*14.43%*	0.00%	3.93%	3.88%	10.64%	80.00%	*5.18%*	0.00%	3.58%	13.32%	5.88%	0.00%	*11.47%*	**11.98%**

SR 82 @ Blackstone Dr
Fort Myers Florida
Wednesday, December 11, 2024

AM Peak Hour

Time	Southbound						Westbound						Northbound						Eastbound						VEHICLE TOTAL
	U Turns	Left Turns	Straight Through	Right Turns	Crosswalk Crossings	*Vehicle Approach Total*	U Turns	Left Turns	Straight Through	Right Turns	Crosswalk Crossings	*Vehicle Approach Total*	U Turns	Left Turns	Straight Through	Right Turns	Crosswalk Crossings	*Vehicle Approach Total*	U Turns	Left Turns	Straight Through	Right Turns	Crosswalk Crossings	*Vehicle Approach Total*	
7:00 AM	0	2	1	43	0	*46*	0	1	222	1	0	*224*	0	13	4	7	0	*24*	0	42	173	2	0	*217*	**511**
7:15 AM	0	1	0	36	0	*37*	0	2	241	0	0	*243*	0	21	11	5	0	*37*	0	31	175	1	0	*207*	**524**
7:30 AM	0	2	5	55	0	*62*	1	0	203	2	0	*206*	0	17	6	0	0	*23*	0	28	145	1	0	*174*	**465**
7:45 AM	0	2	5	61	0	*68*	0	1	189	1	0	*191*	0	15	1	2	0	*18*	0	21	168	4	0	*193*	**470**
Peak Hour Total	0	7	11	195	0	*213*	1	4	855	4	0	*864*	0	66	22	14	0	*102*	0	122	661	8	0	*791*	**1970**
PHF	0.000	0.875	0.550	0.799	0.000	*0.783*	0.250	0.500	0.887	0.500	0.000	*0.889*	0.000	0.786	0.500	0.500	0.000	*0.689*	0.000	0.726	0.944	0.500	0.000	*0.911*	**0.940**

PM Peak Hour

Time	Southbound						Westbound						Northbound						Eastbound						VEHICLE TOTAL
	U Turns	Left Turns	Straight Through	Right Turns	Crosswalk Crossings	*Vehicle Approach Total*	U Turns	Left Turns	Straight Through	Right Turns	Crosswalk Crossings	*Vehicle Approach Total*	U Turns	Left Turns	Straight Through	Right Turns	Crosswalk Crossings	*Vehicle Approach Total*	U Turns	Left Turns	Straight Through	Right Turns	Crosswalk Crossings	*Vehicle Approach Total*	
4:45 PM	0	0	3	26	0	*29*	0	5	193	0	0	*198*	0	6	0	3	0	*9*	0	79	250	7	0	*336*	**572**
5:00 PM	0	0	3	33	0	*36*	0	3	189	0	0	*192*	0	3	3	6	0	*12*	0	65	271	6	0	*342*	**582**
5:15 PM	0	0	1	24	0	*25*	0	5	190	0	0	*195*	0	7	3	1	0	*11*	0	85	280	9	0	*374*	**605**
5:30 PM	0	0	5	25	0	*30*	0	2	170	1	0	*173*	0	7	4	0	0	*11*	1	84	292	13	0	*390*	**604**
Peak Hour Total	0	0	12	108	0	*120*	0	15	742	1	0	*758*	0	23	10	10	0	*43*	1	313	1093	35	0	*1442*	**2363**
PHF	0.000	0.000	0.600	0.818	0.000	*0.833*	0.000	0.750	0.961	0.250	0.000	*0.957*	0.000	0.821	0.625	0.417	0.000	*0.896*	0.250	0.921	0.936	0.673	0.000	*0.924*	**0.976**

TRAFFIC COUNTS

SR 82

@ JAGUAR BLVD.

SR 82 @ Jaguar Blvd
Fort Myers Florida
Wednesday, December 11, 2024

Time	Southbound Jaguar Blvd						Westbound SR 82						Northbound Residential Driveway						Eastbound SR 82						VEHICLE TOTAL
	U Turns	Left Turns	Straight Through	Right Turns	Crosswalk Crossings	*Vehicle Approach Total*	U Turns	Left Turns	Straight Through	Right Turns	Crosswalk Crossings	*Vehicle Approach Total*	U Turns	Left Turns	Straight Through	Right Turns	Crosswalk Crossings	*Vehicle Approach Total*	U Turns	Left Turns	Straight Through	Right Turns	Crosswalk Crossings	*Vehicle Approach Total*	
4:00 PM	0	1	0	32	0	33	0	1	195	0	0	196	0	0	0	0	0	0	0	56	189	0	0	245	474
4:15 PM	0	0	0	33	0	33	0	0	198	1	0	199	0	0	0	0	0	0	1	45	189	0	0	235	467
4:30 PM	0	1	0	28	0	29	0	1	175	3	0	179	0	0	0	0	0	0	0	50	196	0	0	246	454
4:45 PM	0	1	0	20	0	21	0	0	174	1	0	175	0	0	0	0	0	0	0	57	199	0	0	256	452
Hourly Total	0	3	0	113	0	116	0	2	742	5	0	749	0	0	0	0	0	0	1	208	773	0	0	982	1847
5:00 PM	0	1	0	37	0	38	0	0	163	0	0	163	0	0	0	0	0	0	0	56	218	0	0	274	475
5:15 PM	0	0	0	29	0	29	0	0	162	0	0	162	0	0	0	0	0	0	0	62	214	0	0	276	467
5:30 PM	0	2	0	30	0	32	0	0	138	4	0	142	0	0	0	0	0	0	1	63	225	0	0	289	463
5:45 PM	0	0	0	30	0	30	0	0	159	3	0	162	0	0	0	0	0	0	0	52	183	0	0	235	427
Hourly Total	0	3	0	126	0	129	0	0	622	7	0	629	0	0	0	0	0	0	1	233	840	0	0	1074	1832
TOTAL	0	6	0	239	0	245	0	2	1364	12	0	1378	0	0	0	0	0	0	2	441	1613	0	0	2056	3679
Cars	0	6	0	233	0	239	0	2	1253	12	0	1267	0	0	0	0	0	0	2	429	1538	0	0	1969	3475
Heavy Vehicles	0	0	0	6	0	6	0	0	111	0	0	111	0	0	0	0	0	0	0	12	75	0	0	87	204
Heavy Vehicle %	0.00%	0.00%	0.00%	2.51%	0.00%	2.45%	0.00%	0.00%	8.14%	0.00%	0.00%	8.06%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	2.72%	4.65%	0.00%	0.00%	4.23%	5.54%

SR 82 @ Jaguar Blvd
Fort Myers Florida
Wednesday, December 11, 2024
PM Peak Hour

Time	Southbound						Westbound						Northbound						Eastbound						VEHICLE TOTAL
	U Turns	Left Turns	Straight Through	Right Turns	Crosswalk Crossings	*Vehicle Approach Total*	U Turns	Left Turns	Straight Through	Right Turns	Crosswalk Crossings	*Vehicle Approach Total*	U Turns	Left Turns	Straight Through	Right Turns	Crosswalk Crossings	*Vehicle Approach Total*	U Turns	Left Turns	Straight Through	Right Turns	Crosswalk Crossings	*Vehicle Approach Total*	
4:45 PM	0	1	0	20	0	21	0	0	174	1	0	175	0	0	0	0	0	0	0	57	199	0	0	256	452
5:00 PM	0	1	0	37	0	38	0	0	163	0	0	163	0	0	0	0	0	0	0	56	218	0	0	274	475
5:15 PM	0	0	0	29	0	29	0	0	162	0	0	162	0	0	0	0	0	0	0	62	214	0	0	276	467
5:30 PM	0	2	0	30	0	32	0	0	138	4	0	142	0	0	0	0	0	0	1	63	225	0	0	289	463
Peak Hour Total	0	4	0	116	0	120	0	0	637	5	0	642	0	0	0	0	0	0	1	238	856	0	0	1095	1857
PHF	0.000	0.500	0.000	0.784	0.000	0.789	0.000	0.000	0.915	0.313	0.000	0.917	0.000	0.000	0.000	0.000	0.000	0.000	0.250	0.944	0.951	0.000	0.000	0.947	0.977

SYNCHRO SUMMARY SHEETS

SR 82 @ SITE ACCESS DRIVE

HCS Two-Way Stop-Control Report

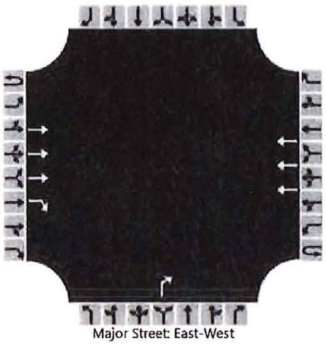
General Information

Analyst	tbt
Agency/Co.	TR Transportation Consult
Date Performed	10/21/2025
Analysis Year	2030
Time Analyzed	AM Peak Hour W/Project
Intersection Orientation	East-West
Project Description	SR 82 Freeman MPD

Site Information

Intersection	SR 82 @ Site Accees
Jurisdiction	Lee Co.
East/West Street	SR 82
North/South Street	Site Access
Peak Hour Factor	0.96
Analysis Time Period (hrs)	0.25

Lanes



Vehicle Volumes and Adjustments

Approach	Eastbound				Westbound				Northbound				Southbound			
Movement	U	L	T	R	U	L	T	R	U	L	T	R	U	L	T	R
Priority	1U	1	2	3	4U	4	5	6		7	8	9		10	11	12
Number of Lanes	0	0	3	1	0	0	3	0		0	0	1		0	0	0
Configuration			T	R			T					R				
Volume (veh/h)			1016	811			1242					250				
Percent Heavy Vehicles (%)												6				
Proportion Time Blocked																
Percent Grade (%)										0						
Right Turn Channelized		No								No						
Median Type | Storage		Undivided														

Critical and Follow-up Headways

Base Critical Headway (sec)												7.1				
Critical Headway (sec)												7.22				
Base Follow-Up Headway (sec)												3.9				
Follow-Up Headway (sec)												3.96				

Delay, Queue Length, and Level of Service

Flow Rate, v (veh/h)												260				
Capacity, c (veh/h)												415				
v/c Ratio												0.63				
95% Queue Length, Q_{95} (veh)												4.2				
95% Queue Length, Q_{95} (ft)												110.0				
Control Delay (s/veh)												27.2				
Level of Service (LOS)												D				
Approach Delay (s/veh)										27.2						
Approach LOS										D						

HCS Two-Way Stop-Control Report

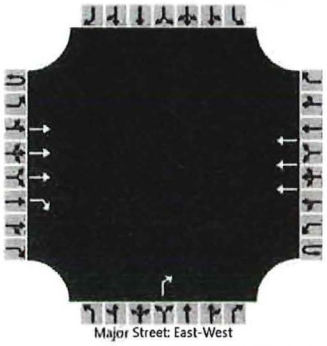
General Information

Analyst	tbt
Agency/Co.	TR Transportation Consult
Date Performed	10/21/2025
Analysis Year	2030
Time Analyzed	PM Peak Hour W/Project
Intersection Orientation	East-West
Project Description	SR 82 Freeman MPD

Site Information

Intersection	SR 82 @ Site Accees
Jurisdiction	Lee Co.
East/West Street	SR 82
North/South Street	Site Access
Peak Hour Factor	0.96
Analysis Time Period (hrs)	0.25

Lanes



Vehicle Volumes and Adjustments

Approach	Eastbound				Westbound				Northbound				Southbound			
Movement	U	L	T	R	U	L	T	R	U	L	T	R	U	L	T	R
Priority	1U	1	2	3	4U	4	5	6		7	8	9		10	11	12
Number of Lanes	0	0	3	1	0	0	3	0		0	0	1		0	0	0
Configuration			T	R			T					R				
Volume (veh/h)			1242	550			1016					1002				
Percent Heavy Vehicles (%)												4				
Proportion Time Blocked																
Percent Grade (%)										0						
Right Turn Channelized		No								No						
Median Type | Storage		Undivided														

Critical and Follow-up Headways

Base Critical Headway (sec)												7.1				
Critical Headway (sec)												7.18				
Base Follow-Up Headway (sec)												3.9				
Follow-Up Headway (sec)												3.94				

Delay, Queue Length, and Level of Service

Flow Rate, v (veh/h)												1044				
Capacity, c (veh/h)												351				
v/c Ratio												2.97				
95% Queue Length, Q_{95} (veh)												90.9				
95% Queue Length, Q_{95} (ft)												2345.2				
Control Delay (s/veh)												918.9				
Level of Service (LOS)												F				
Approach Delay (s/veh)										918.9						
Approach LOS										F						

SYNCHRO SUMMARY SHEETS

S.R. 82 @ EASTERN U-TURN

HCS Two-Way Stop-Control Report

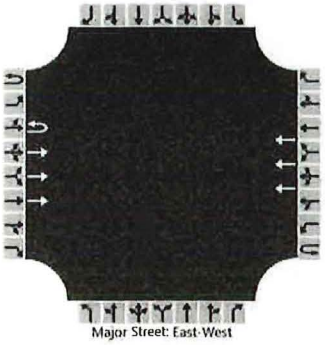
General Information

Analyst	tbt
Agency/Co.	TR Transportation Consult
Date Performed	10/21/2025
Analysis Year	2030
Time Analyzed	AM Peak Hour W/Project
Intersection Orientation	East-West
Project Description	SR 82 Freeman MPD

Site Information

Intersection	SR 82 @ E. U-Turn
Jurisdiction	Lee Co.
East/West Street	SR 82
North/South Street	Site Access
Peak Hour Factor	0.96
Analysis Time Period (hrs)	0.25

Lanes



Vehicle Volumes and Adjustments

Approach	Eastbound				Westbound				Northbound				Southbound			
Movement	U	L	T	R	U	L	T	R	U	L	T	R	U	L	T	R
Priority	1U	1	2	3	4U	4	5	6		7	8	9		10	11	12
Number of Lanes	1	0	3	0	0	0	3	0		0	0	0		0	0	0
Configuration	U		T				T									
Volume (veh/h)	175		1091				1242									
Percent Heavy Vehicles (%)	3															
Proportion Time Blocked																
Percent Grade (%)																
Right Turn Channelized																
Median Type | Storage	Undivided															

Critical and Follow-up Headways

Base Critical Headway (sec)	5.6															
Critical Headway (sec)	5.66															
Base Follow-Up Headway (sec)	2.3															
Follow-Up Headway (sec)	2.33															

Delay, Queue Length, and Level of Service

Flow Rate, v (veh/h)	182															
Capacity, c (veh/h)	468															
v/c Ratio	0.39															
95% Queue Length, Q_{95} (veh)	1.8															
95% Queue Length, Q_{95} (ft)	46.1															
Control Delay (s/veh)	17.5															
Level of Service (LOS)	C															
Approach Delay (s/veh)	2.4															
Approach LOS	A															

HCS Two-Way Stop-Control Report

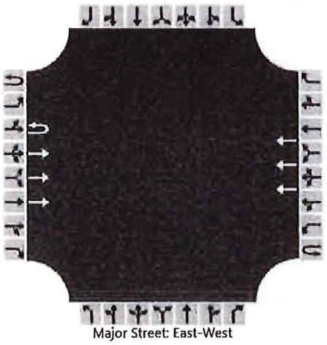
General Information

Analyst	tbt
Agency/Co.	TR Transportation Consult
Date Performed	10/21/2025
Analysis Year	2030
Time Analyzed	PM Peak Hour W/Project
Intersection Orientation	East-West
Project Description	SR 82 Freeman MPD

Site Information

Intersection	SR 82 @ E. U-Turn
Jurisdiction	Lee Co.
East/West Street	SR 82
North/South Street	Site Access
Peak Hour Factor	0.96
Analysis Time Period (hrs)	0.25

Lanes



Vehicle Volumes and Adjustments

Approach	Eastbound				Westbound				Northbound				Southbound			
Movement	U	L	T	R	U	L	T	R	U	L	T	R	U	L	T	R
Priority	1U	1	2	3	4U	4	5	6		7	8	9		10	11	12
Number of Lanes	1	0	3	0	0	0	3	0		0	0	0		0	0	0
Configuration	U		T				T									
Volume (veh/h)	701		1543				1016									
Percent Heavy Vehicles (%)	3															
Proportion Time Blocked																
Percent Grade (%)																
Right Turn Channelized																
Median Type | Storage	Undivided															

Critical and Follow-up Headways

Base Critical Headway (sec)	5.6															
Critical Headway (sec)	5.66															
Base Follow-Up Headway (sec)	2.3															
Follow-Up Headway (sec)	2.33															

Delay, Queue Length, and Level of Service

Flow Rate, v (veh/h)	730															
Capacity, c (veh/h)	583															
v/c Ratio	1.25															
95% Queue Length, Q_{95} (veh)	28.2															
95% Queue Length, Q_{95} (ft)	721.9															
Control Delay (s/veh)	150.1															
Level of Service (LOS)	F															
Approach Delay (s/veh)	46.9															
Approach LOS	F															

SYNCHRO SUMMARY SHEETS

S.R. 82 @ WESTERN U-TURN

HCS Two-Way Stop-Control Report

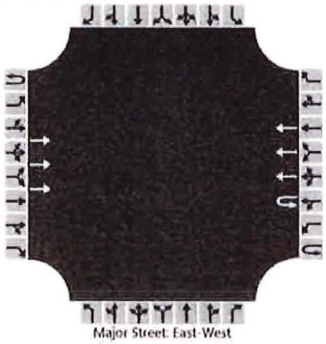
General Information

Analyst	tbt
Agency/Co.	TR Transportation Consult
Date Performed	10/21/2025
Analysis Year	2030
Time Analyzed	AM Peak Hour W/Project
Intersection Orientation	East-West
Project Description	SR 82 Freeman MPD

Site Information

Intersection	SR 82 @ W. U-Turn
Jurisdiction	Lee Co.
East/West Street	SR 82
North/South Street	Site Access
Peak Hour Factor	0.96
Analysis Time Period (hrs)	0.25

Lanes



Vehicle Volumes and Adjustments

Approach	Eastbound				Westbound				Northbound				Southbound			
Movement	U	L	T	R	U	L	T	R	U	L	T	R	U	L	T	R
Priority	1U	1	2	3	4U	4	5	6		7	8	9		10	11	12
Number of Lanes	0	0	3	0	1	0	3	0		0	0	0		0	0	0
Configuration			T		U		T									
Volume (veh/h)			1827		243		2012									
Percent Heavy Vehicles (%)					3											
Proportion Time Blocked																
Percent Grade (%)																
Right Turn Channelized																
Median Type | Storage	Undivided															

Critical and Follow-up Headways

Base Critical Headway (sec)					5.6											
Critical Headway (sec)					5.66											
Base Follow-Up Headway (sec)					2.3											
Follow-Up Headway (sec)					2.33											

Delay, Queue Length, and Level of Service

Flow Rate, v (veh/h)					253											
Capacity, c (veh/h)					264											
v/c Ratio					0.96											
95% Queue Length, Q_{95} (veh)					9.1											
95% Queue Length, Q_{95} (ft)					233.0											
Control Delay (s/veh)					87.0											
Level of Service (LOS)					F											
Approach Delay (s/veh)					9.4											
Approach LOS					A											

HCS Two-Way Stop-Control Report

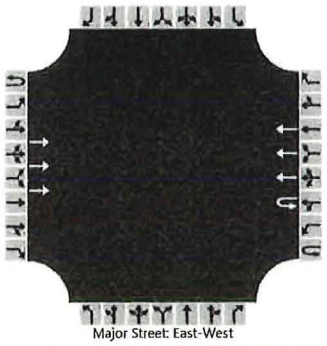
General Information

Analyst	tbt
Agency/Co.	TR Transportation Consult
Date Performed	10/21/2025
Analysis Year	2030
Time Analyzed	PM Peak Hour W/Project
Intersection Orientation	East-West
Project Description	SR 82 Freeman MPD

Site Information

Intersection	SR 82 @ W. U-Turn
Jurisdiction	Lee Co.
East/West Street	SR 82
North/South Street	Site Access
Peak Hour Factor	0.96
Analysis Time Period (hrs)	0.25

Lanes



Vehicle Volumes and Adjustments

Approach	Eastbound				Westbound				Northbound				Southbound			
Movement	U	L	T	R	U	L	T	R	U	L	T	R	U	L	T	R
Priority	1U	1	2	3	4U	4	5	6		7	8	9		10	11	12
Number of Lanes	0	0	3	0	1	0	3	0		0	0	0		0	0	0
Configuration			T		U		T									
Volume (veh/h)			1792		165		1417									
Percent Heavy Vehicles (%)					3											
Proportion Time Blocked																
Percent Grade (%)																
Right Turn Channelized																
Median Type | Storage	Undivided															

Critical and Follow-up Headways

Base Critical Headway (sec)					5.6											
Critical Headway (sec)					5.66											
Base Follow-Up Headway (sec)					2.3											
Follow-Up Headway (sec)					2.33											

Delay, Queue Length, and Level of Service

Flow Rate, v (veh/h)					172											
Capacity, c (veh/h)					273											
v/c Ratio					0.63											
95% Queue Length, Q_{95} (veh)					3.9											
95% Queue Length, Q_{95} (ft)					99.8											
Control Delay (s/veh)					38.2											
Level of Service (LOS)					E											
Approach Delay (s/veh)					4.0											
Approach LOS					A											

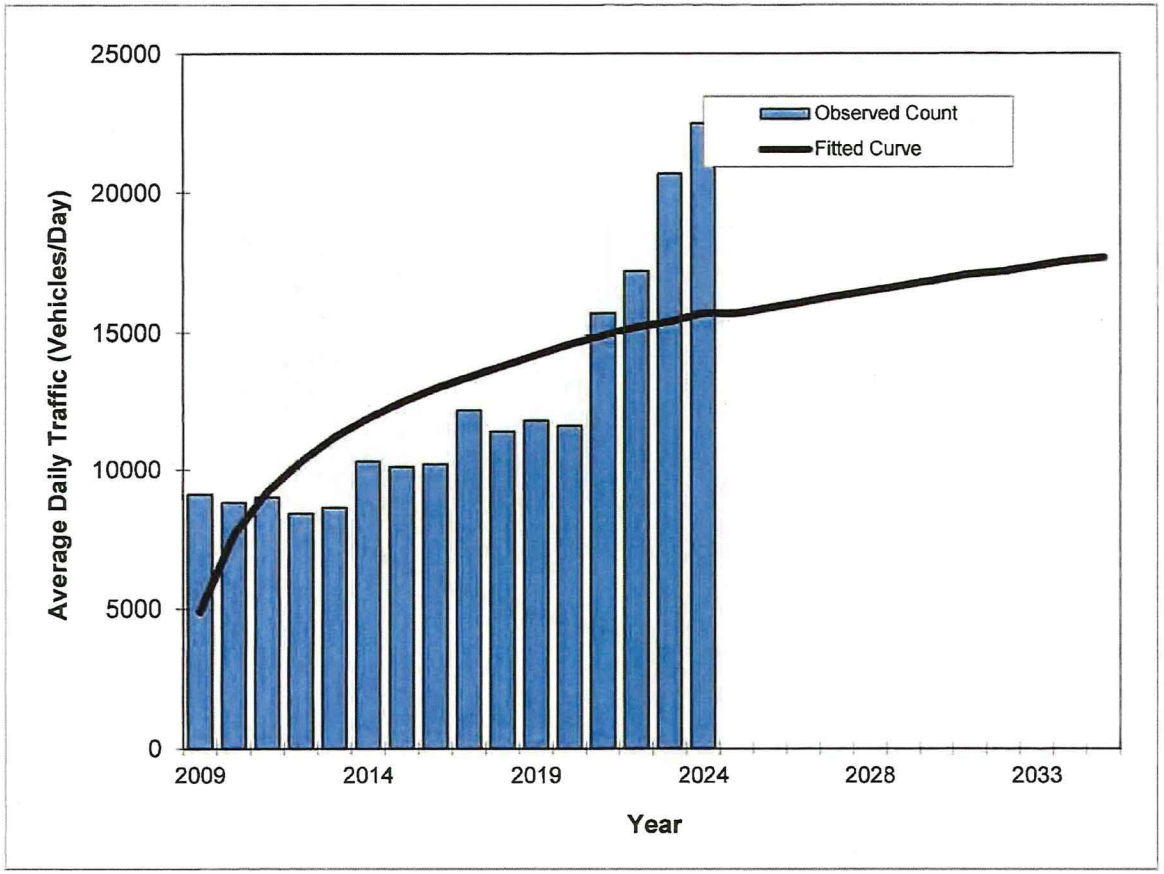
FDOT TRAFFIC TRENDS
SPREADSHEET
ANNUAL GROWTH RATE
CALCULATIONS

Traffic Trends - V03.a

SR 82 W. of Bell Blvd. -- 79220000

FIN#	1234
Location	1

County:	Lee
Station #:	0068
Highway:	SR 82 W. of Bell Blvd.



Year	Traffic (ADT/AADT) Count*	Trend**
2009	9100	4900
2010	8800	7600
2011	9000	9200
2012	8400	10300
2013	8600	11200
2014	10300	11900
2015	10100	12500
2016	10200	13000
2017	12200	13400
2018	11400	13800
2019	11800	14200
2020	11600	14600
2021	15700	14900
2022	17200	15200
2023	20700	15400
2024	22500	15700
2013 Opening Year Trend		
2013	N/A	11200
2023 Mid-Year Trend		
2023	N/A	15400
2033 Design Year Trend		
2033	N/A	17400
TRANPLAN Forecasts/Trends		

Trend R-squared:	49.04%
Compounded Annual Historic Growth Rate:	28.10%
Compounded Growth Rate (2011 to Design Year):	2.41%
Printed:	21-Oct-25

Decaying Exponential Growth Option

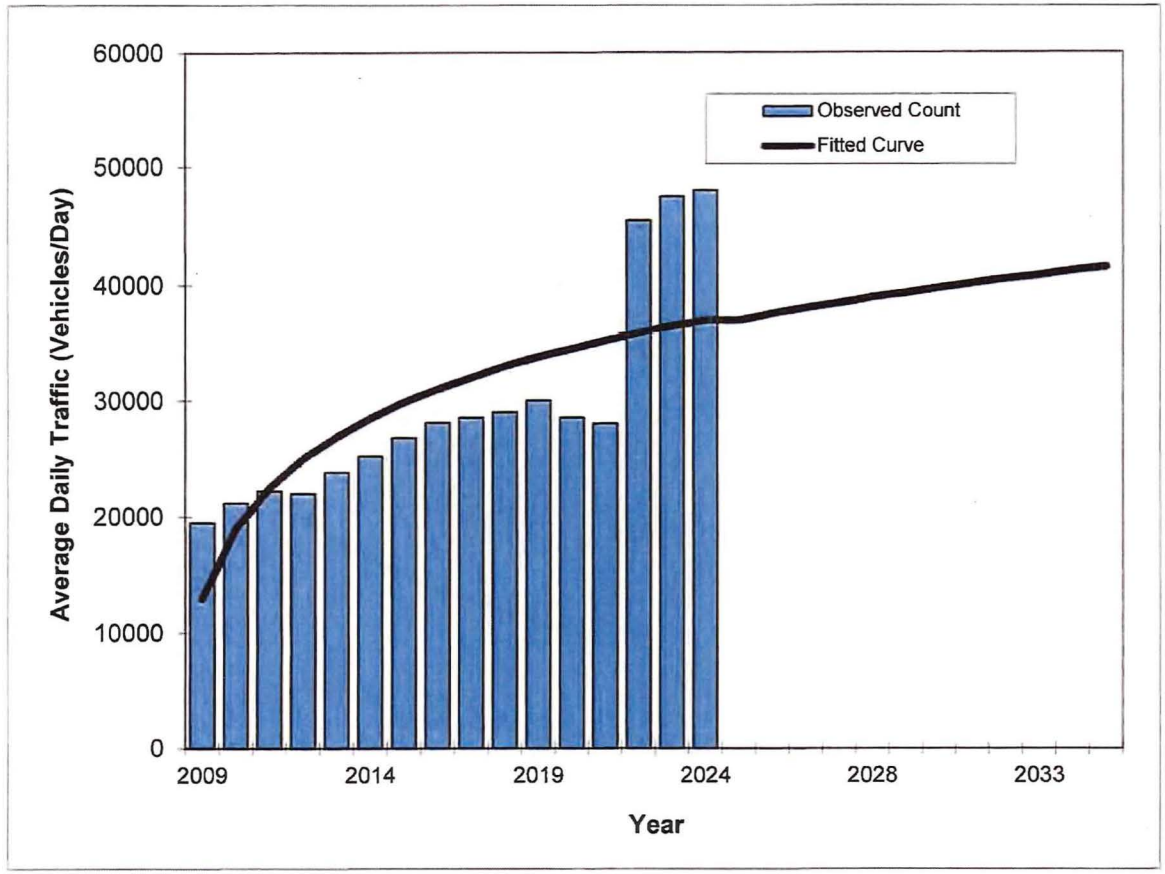
***Axle-Adjusted**

Traffic Trends - V03.a

SR 82 E. of Gunnery Rd./Daniels Pkwy. -- 79220000

FIN#	1234
Location	1

County:	Lee
Station #:	6021
Highway:	SR 82 E. of Gunnery Rd./Daniels Pkwy.



Year	Traffic (ADT/AADT) Count*	Trend**
2009	19500	13000
2010	21200	19000
2011	22200	22500
2012	22000	25000
2013	23800	26900
2014	25200	28500
2015	26800	29900
2016	28100	31000
2017	28500	32000
2018	29000	33000
2019	30000	33800
2020	28500	34500
2021	28000	35200
2022	45500	35900
2023	47500	36500
2024	48000	37000
2013 Opening Year Trend		
2013	N/A	26900
2023 Mid-Year Trend		
2023	N/A	36500
2033 Design Year Trend		
2033	N/A	40900
TRANPLAN Forecasts/Trends		

Trend R-squared:	55.66%
Compounded Annual Historic Growth Rate:	24.36%
Compounded Growth Rate (2011 to Design Year):	2.26%
Printed:	21-Oct-25

Decaying Exponential Growth Option

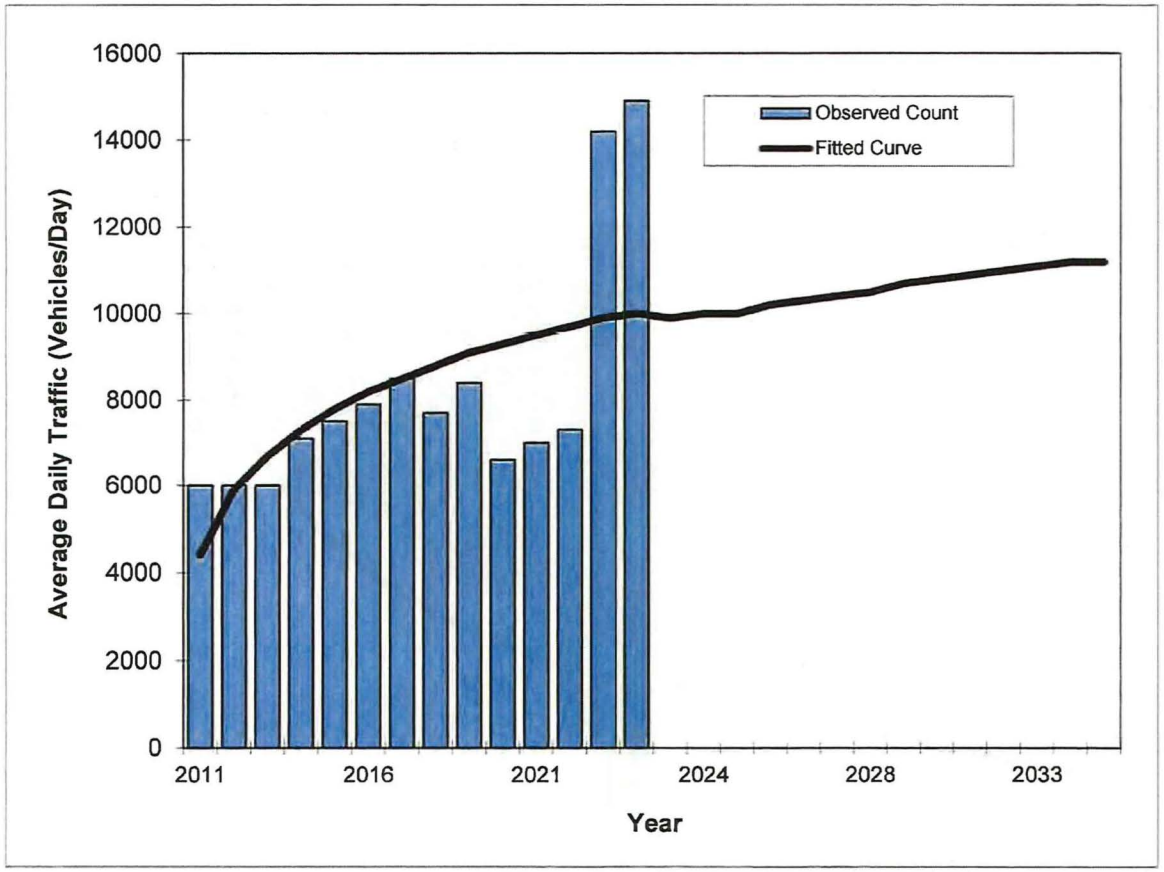
***Axle-Adjusted**

Traffic Trends - V03.a

Alabama Rd. N. of SR 82 -- 79220000

FIN#	1234
Location	1

County:	Lee
Station #:	4623
Highway:	Alabama Rd. N. of SR 82



Year	Traffic (ADT/AADT) Count*	Trend**
2011	6000	4400
2012	6000	5900
2013	6000	6700
2014	7100	7300
2015	7500	7800
2016	7900	8200
2017	8500	8500
2018	7700	8800
2019	8400	9100
2020	6600	9300
2021	7000	9500
2022	7300	9700
2023	14200	9900
2024	14900	10000
2013 Opening Year Trend		
2013	N/A	6700
2023 Mid-Year Trend		
2023	N/A	9900
2033 Design Year Trend		
2033	N/A	11100
TRANPLAN Forecasts/Trends		

Trend R-squared:	34.49%
Compounded Annual Historic Growth Rate:	18.38%
Compounded Growth Rate (2011 to Design Year):	1.92%
Printed:	21-Oct-25

Decaying Exponential Growth Option

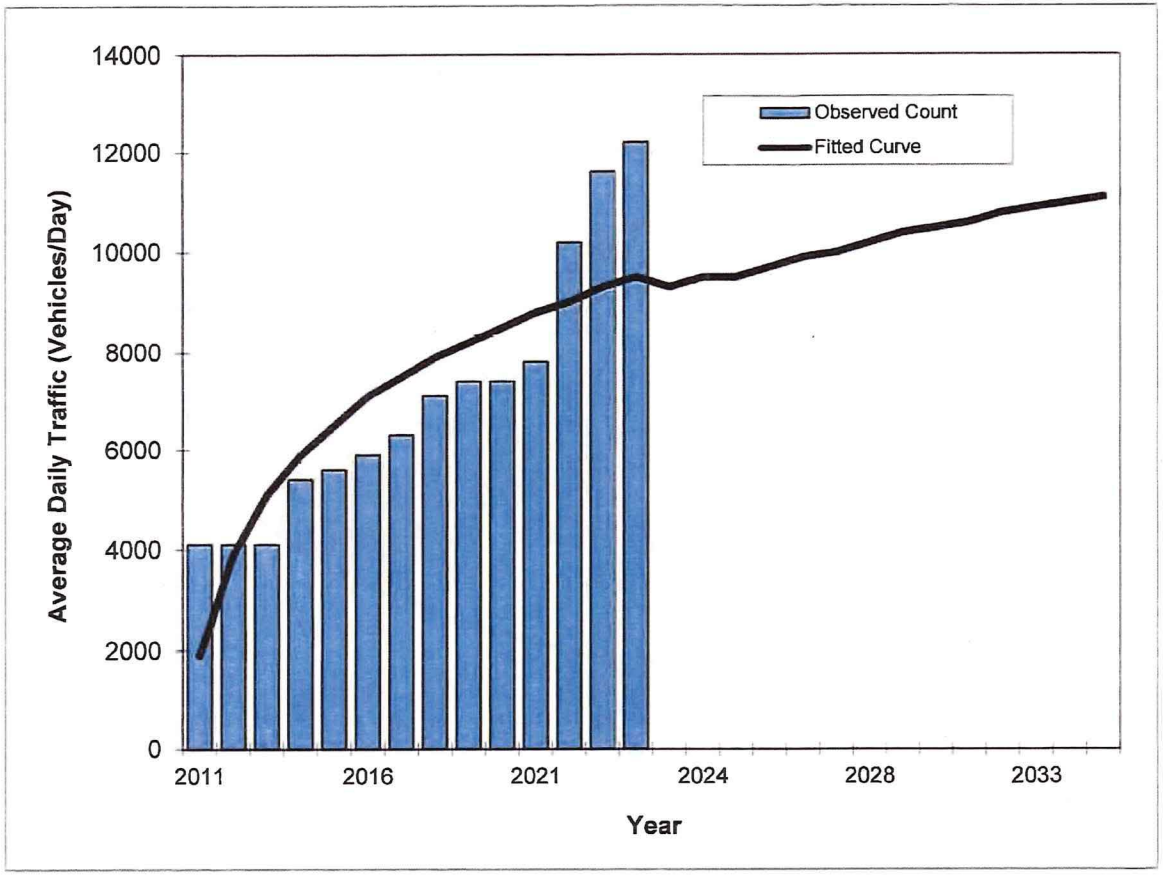
*Axle-Adjusted

Traffic Trends - V03.a

Sunshine Blvd. N. of SR 82 -- 79220000

FIN#	1234
Location	1

County:	Lee
Station #:	4182
Highway:	Sunshine Blvd. N. of SR 82



Year	Traffic (ADT/AADT) Count*	Trend**
2011	4100	1900
2012	4100	3900
2013	4100	5100
2014	5400	5900
2015	5600	6500
2016	5900	7100
2017	6300	7500
2018	7100	7900
2019	7400	8200
2020	7400	8500
2021	7800	8800
2022	10200	9000
2023	11600	9300
2024	12200	9500
2013 Opening Year Trend		
2013	N/A	5100
2023 Mid-Year Trend		
2023	N/A	9300
2033 Design Year Trend		
2033	N/A	10900
TRANPLAN Forecasts/Trends		

Trend R-squared:	69.96%
Compounded Annual Historic Growth Rate:	45.89%
Compounded Growth Rate (2011 to Design Year):	2.83%
Printed:	21-Oct-25

Decaying Exponential Growth Option

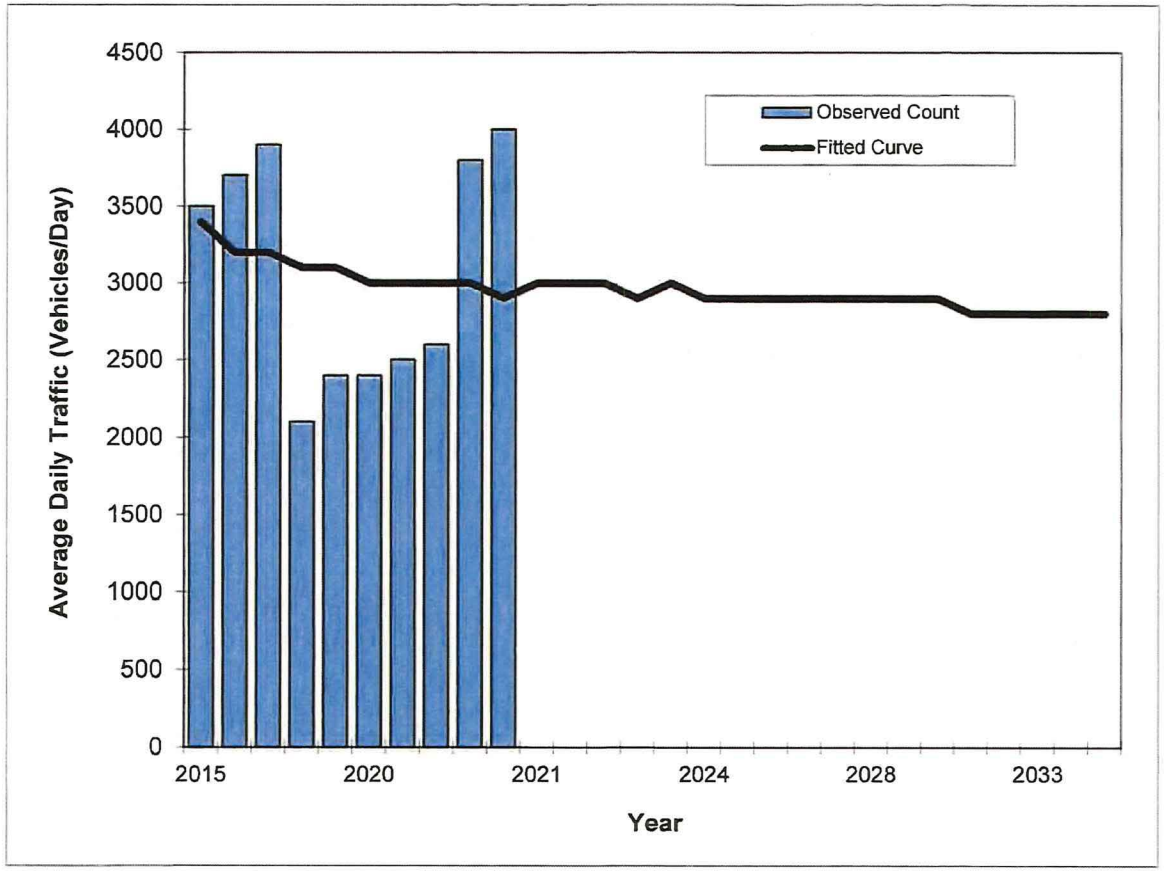
*Axle-Adjusted

Traffic Trends - V03.a

Jaguar Bvd. E. of SR 82 -- 79220000

FIN#	1234
Location	1

County:	Lee
Station #:	0152
Highway:	Jaguar Bvd. E. of SR 82



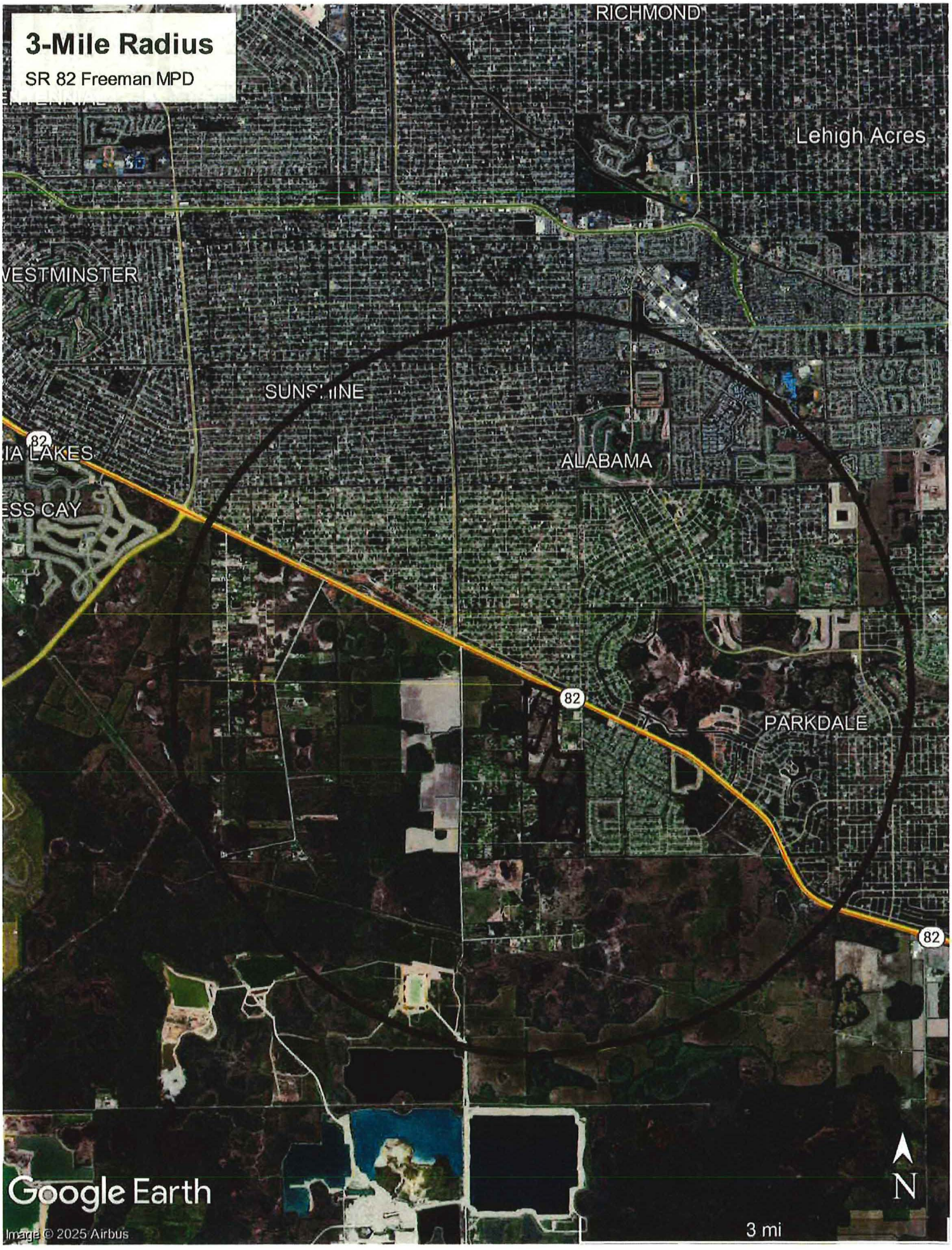
Year	Traffic (ADT/AADT) Count*	Trend**
2015	3500	3400
2016	3700	3200
2017	3900	3200
2018	2100	3100
2019	2400	3100
2020	2400	3000
2021	2500	3000
2022	2600	3000
2023	3800	3000
2024	4000	2900
2013 Opening Year Trend		
2013	N/A	#N/A
2023 Mid-Year Trend		
2023	N/A	3000
2033 Design Year Trend		
2033	N/A	2800
TRANPLAN Forecasts/Trends		

Trend R-squared:	3.45%
Compounded Annual Historic Growth Rate:	-3.03%
Compounded Growth Rate (2011 to Design Year):	-0.46%
Printed:	21-Oct-25

Decaying Exponential Growth Option

***Axle-Adjusted**

3-MILE RADIUS
STUDY AREA


3-Mile Radius
SR 82 Freeman MPD
RICHMOND
Lehigh Acres
VESTMINSTER
SUNSHINE
82
IA LAKES
ESS CAY
ALABAMA
82
PARKDALE
82
Google Earth
Image © 2025 Airbus
N
3 mi

TRIP GENERATION EQUATIONS

Shopping Center (>150k)
(820)

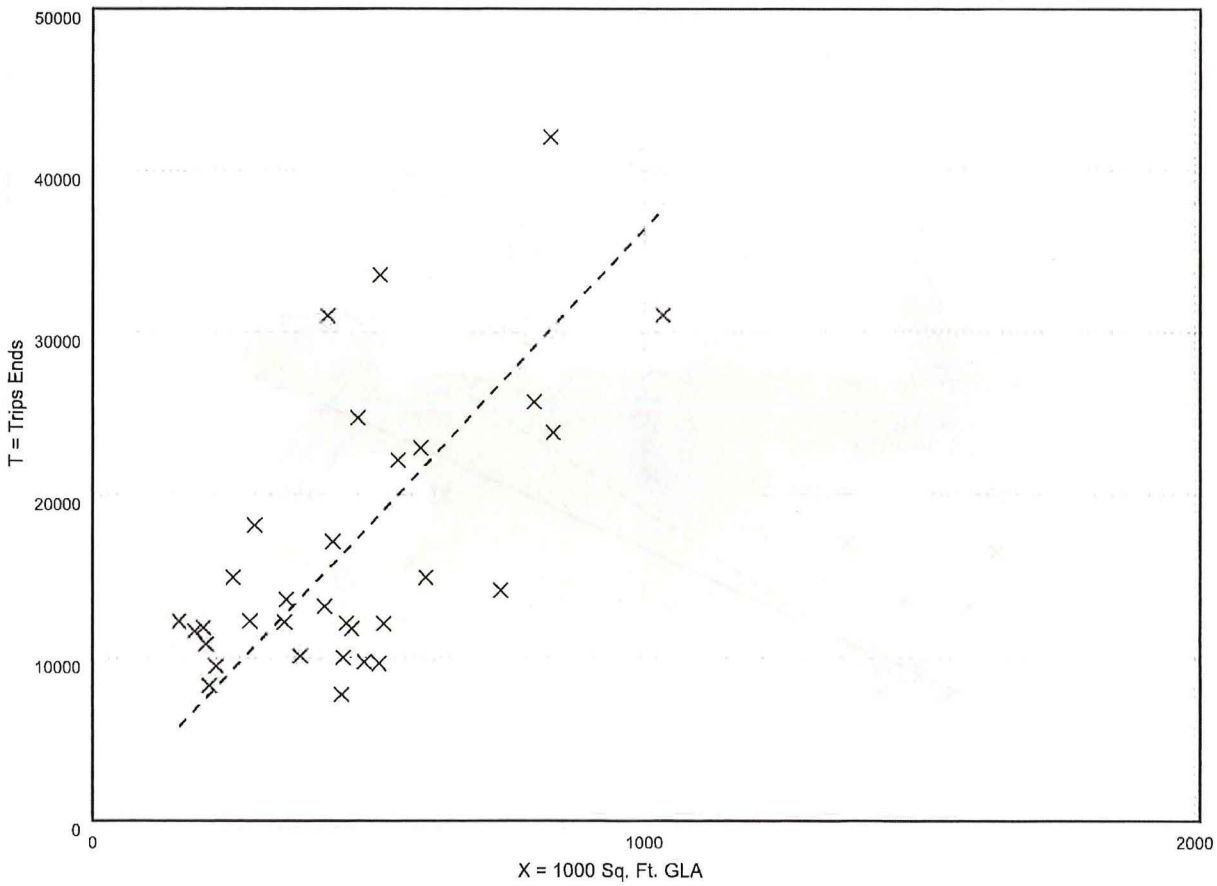
Vehicle Trip Ends vs: 1000 Sq. Ft. GLA
On a: Weekday

Setting/Location: General Urban/Suburban
Number of Studies: 32
Avg. 1000 Sq. Ft. GLA: 459
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GLA

Average Rate	Range of Rates	Standard Deviation
36.39	17.27 - 77.31	15.38

Data Plot and Equation



Fitted Curve Equation: Not Given

R^2= ***

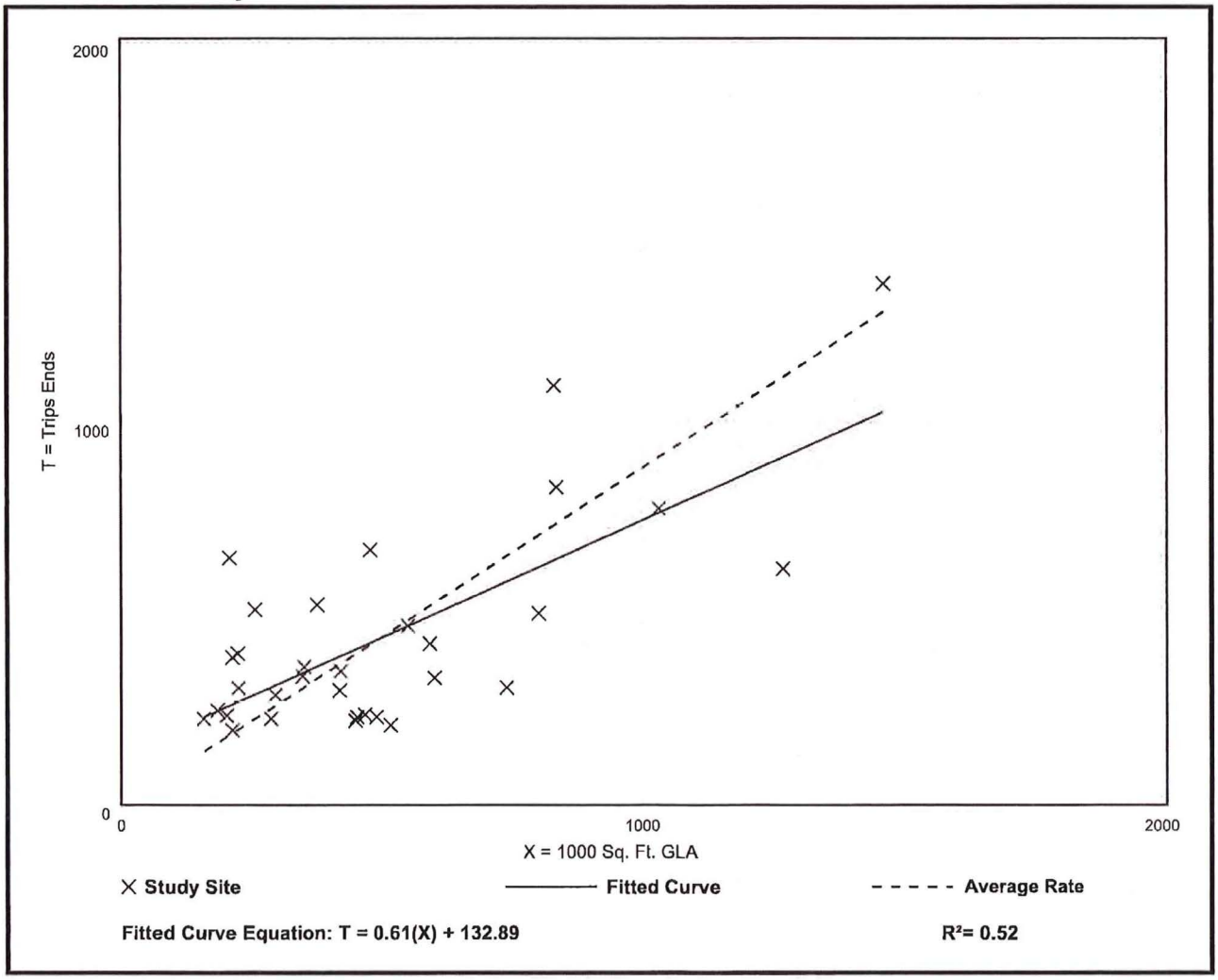
Shopping Center (>150k)
(820)

Vehicle Trip Ends vs: **1000 Sq. Ft. GLA**
On a: **Weekday,**
Peak Hour of Adjacent Street Traffic,
One Hour Between 7 and 9 a.m.
Setting/Location: **General Urban/Suburban**
Number of Studies: 32
Avg. 1000 Sq. Ft. GLA: 498
Directional Distribution: 62% entering, 38% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GLA

Average Rate	Range of Rates	Standard Deviation
0.88	0.40 - 3.10	0.45

Data Plot and Equation



Fitted Curve Equation: T = 0.61(X) + 132.89

R^2= 0.52

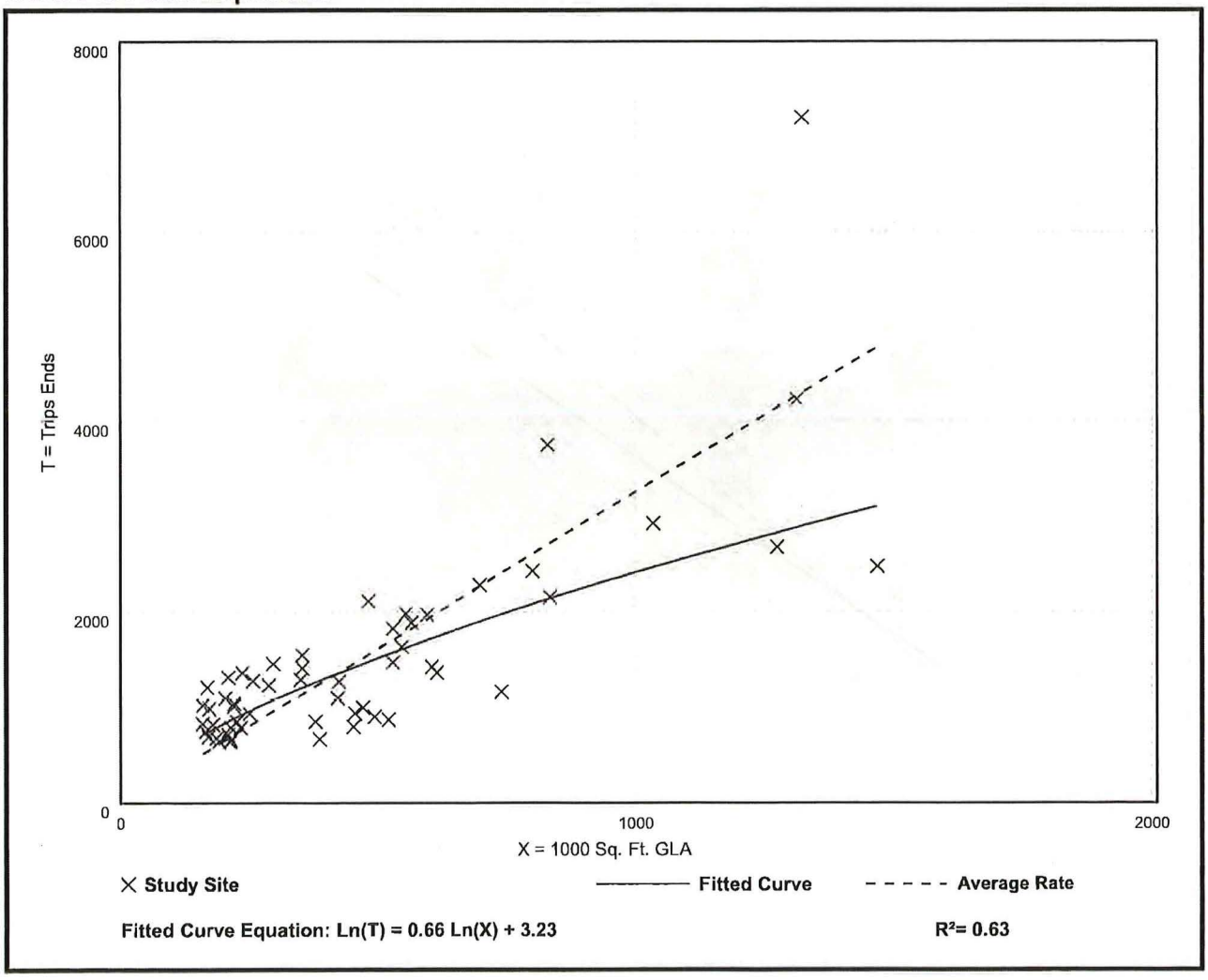
Shopping Center (>150k)
(820)

Vehicle Trip Ends vs: **1000 Sq. Ft. GLA**
On a: **Weekday,**
Peak Hour of Adjacent Street Traffic,
One Hour Between 4 and 6 p.m.
Setting/Location: **General Urban/Suburban**
Number of Studies: 55
Avg. 1000 Sq. Ft. GLA: 460
Directional Distribution: 49% entering, 51% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GLA

Average Rate	Range of Rates	Standard Deviation
3.26	1.57 - 7.22	1.25

Data Plot and Equation



Fitted Curve Equation: Ln(T) = 0.66 Ln(X) + 3.23

R^2= 0.63

General Office Building
(710)

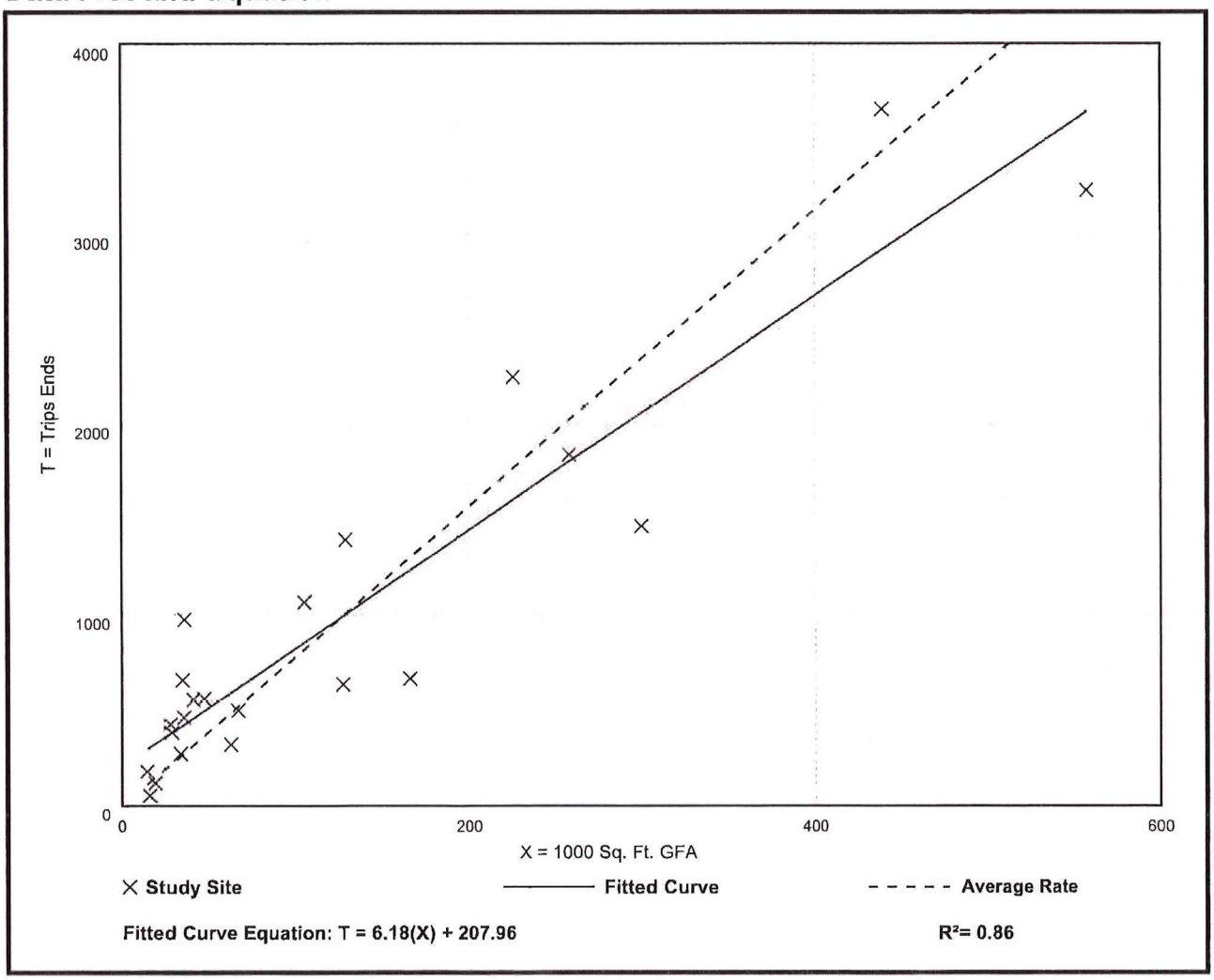
Vehicle Trip Ends vs: 1000 Sq. Ft. GFA
On a: Weekday

Setting/Location: General Urban/Suburban
Number of Studies: 22
Avg. 1000 Sq. Ft. GFA: 126
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
7.83	3.27 - 27.56	3.71

Data Plot and Equation



Fitted Curve Equation: T = 6.18(X) + 207.96

R^2= 0.86

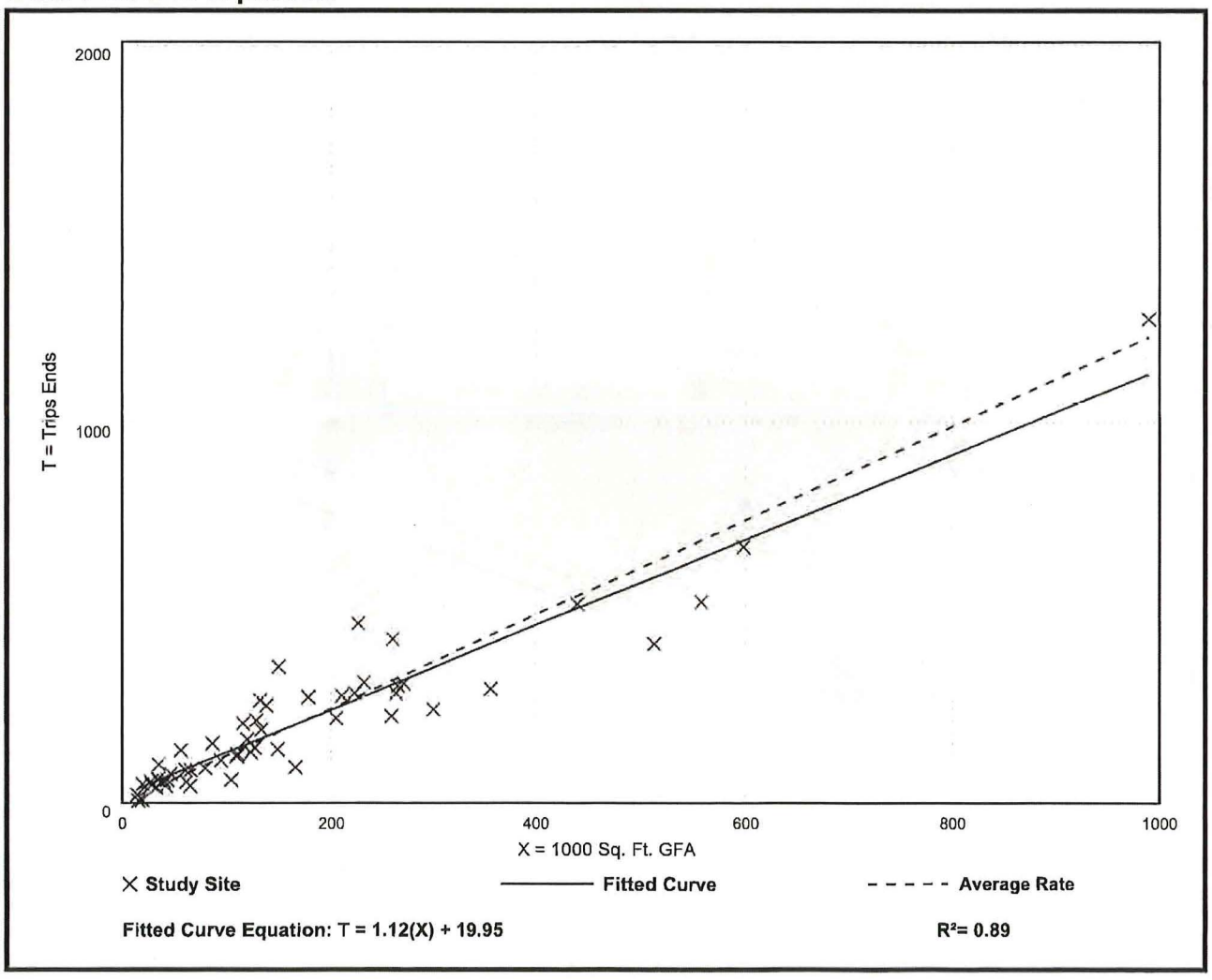
General Office Building
(710)

Vehicle Trip Ends vs: **1000 Sq. Ft. GFA**
On a: **Weekday,**
Peak Hour of Adjacent Street Traffic,
One Hour Between 7 and 9 a.m.
Setting/Location: **General Urban/Suburban**
Number of Studies: 54
Avg. 1000 Sq. Ft. GFA: 170
Directional Distribution: 88% entering, 12% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
1.24	0.32 - 2.83	0.40

Data Plot and Equation



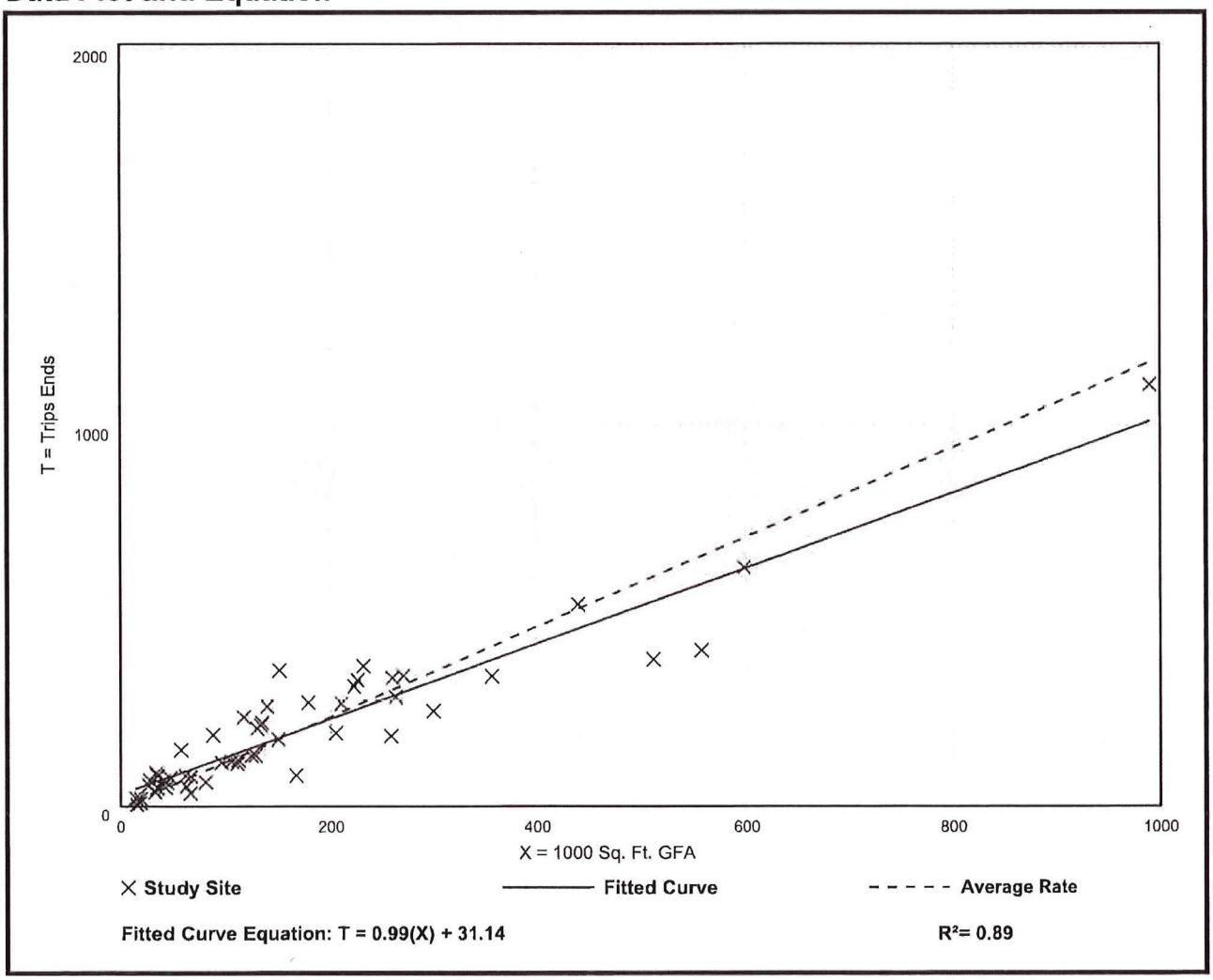
General Office Building
(710)

Vehicle Trip Ends vs: **1000 Sq. Ft. GFA**
On a: **Weekday,**
Peak Hour of Adjacent Street Traffic,
One Hour Between 4 and 6 p.m.
Setting/Location: **General Urban/Suburban**
Number of Studies: 53
Avg. 1000 Sq. Ft. GFA: 166
Directional Distribution: 16% entering, 84% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
1.18	0.26 - 2.59	0.41

Data Plot and Equation



Medical-Dental Office Building - Stand-Alone (720)

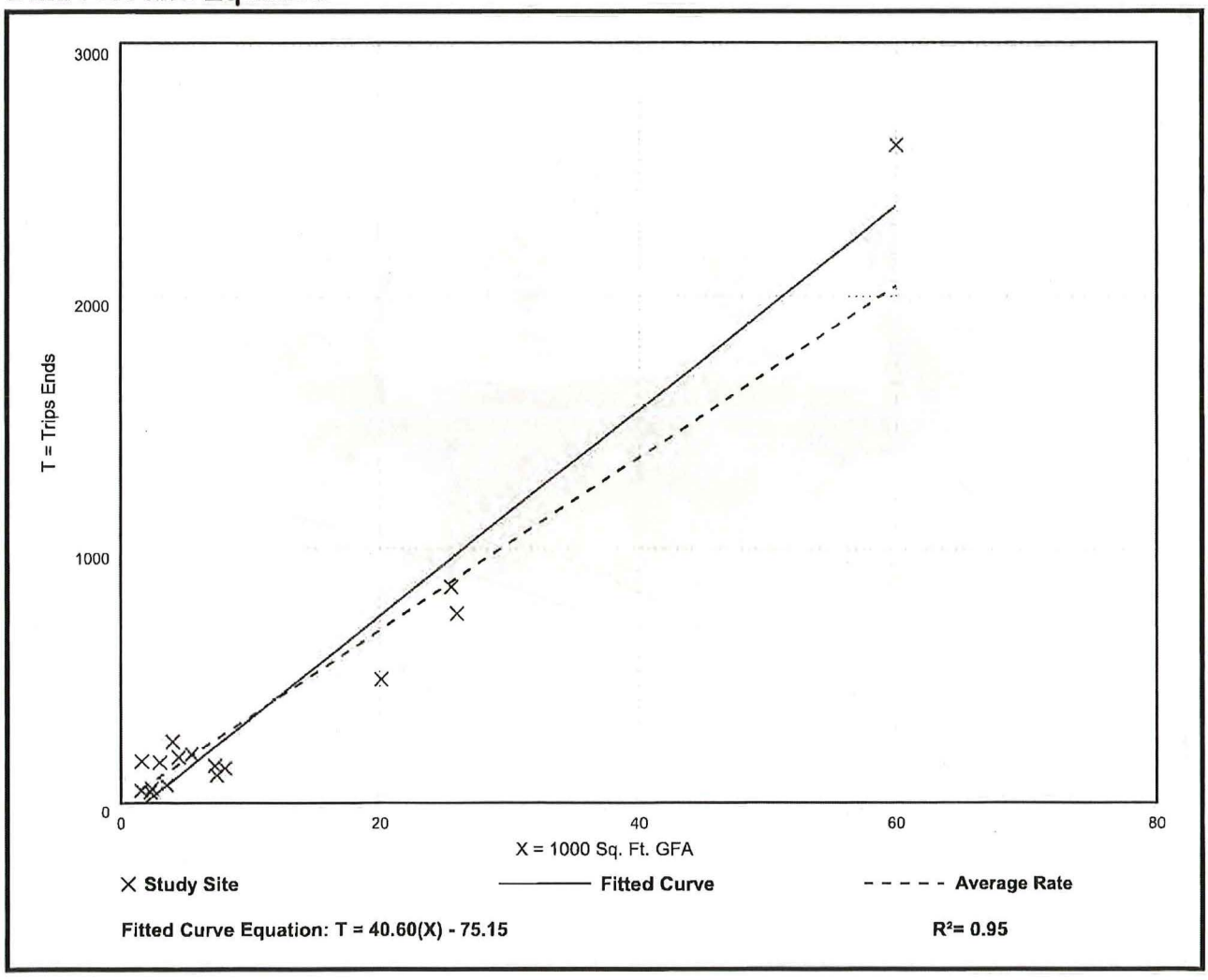
Vehicle Trip Ends vs: 1000 Sq. Ft. GFA
On a: Weekday

Setting/Location: General Urban/Suburban
Number of Studies: 16
Avg. 1000 Sq. Ft. GFA: 11
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
34.03	14.52 - 100.75	12.64

Data Plot and Equation



Fitted Curve Equation: T = 40.60(X) - 75.15

R^2= 0.95

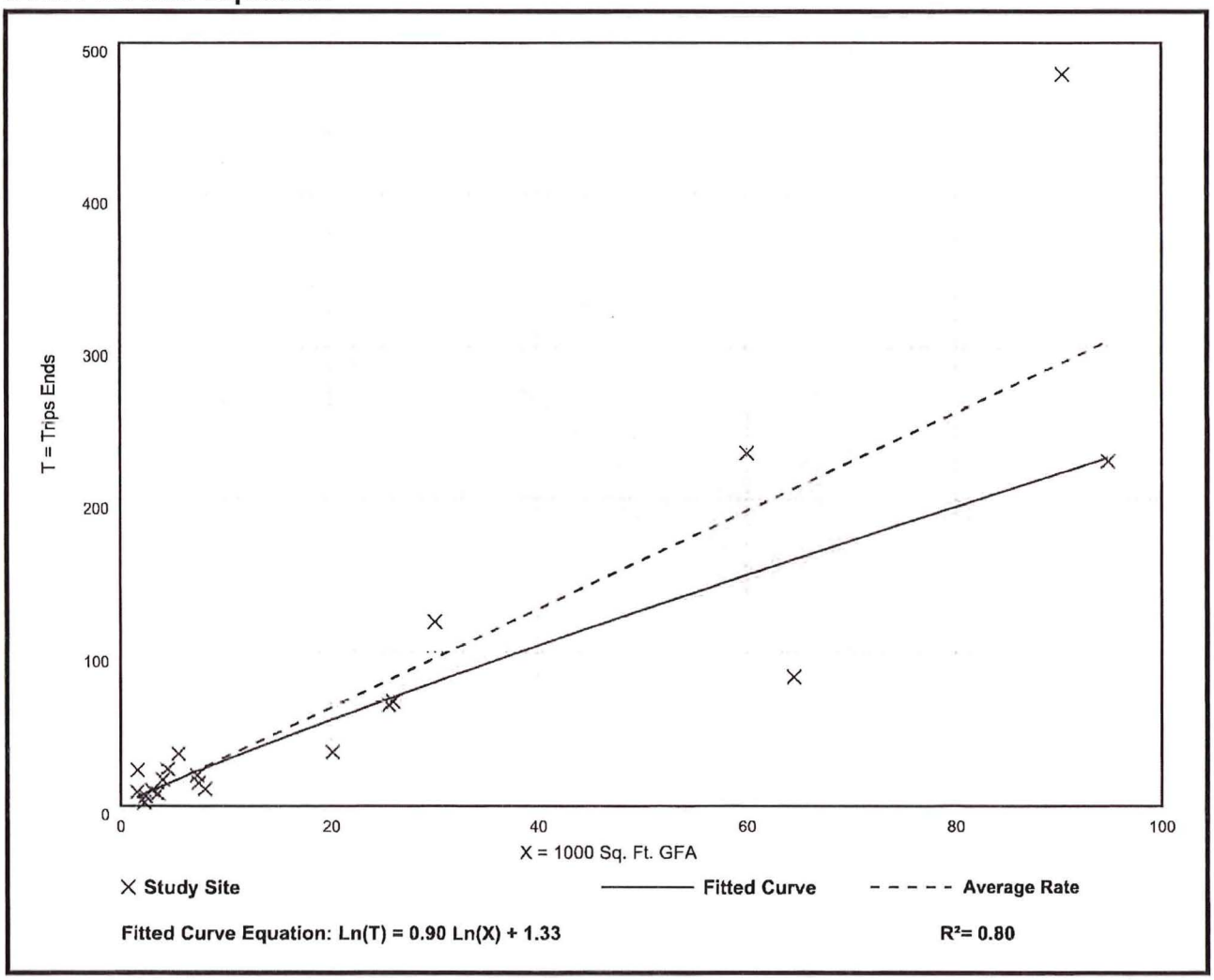
Medical-Dental Office Building - Stand-Alone (720)

Vehicle Trip Ends vs: **1000 Sq. Ft. GFA**
On a: **Weekday,**
Peak Hour of Adjacent Street Traffic,
One Hour Between 7 and 9 a.m.
Setting/Location: **General Urban/Suburban**
Number of Studies: 20
Avg. 1000 Sq. Ft. GFA: 23
Directional Distribution: 78% entering, 22% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
3.21	0.87 - 14.30	1.61

Data Plot and Equation



Fitted Curve Equation: Ln(T) = 0.90 Ln(X) + 1.33

R^2= 0.80

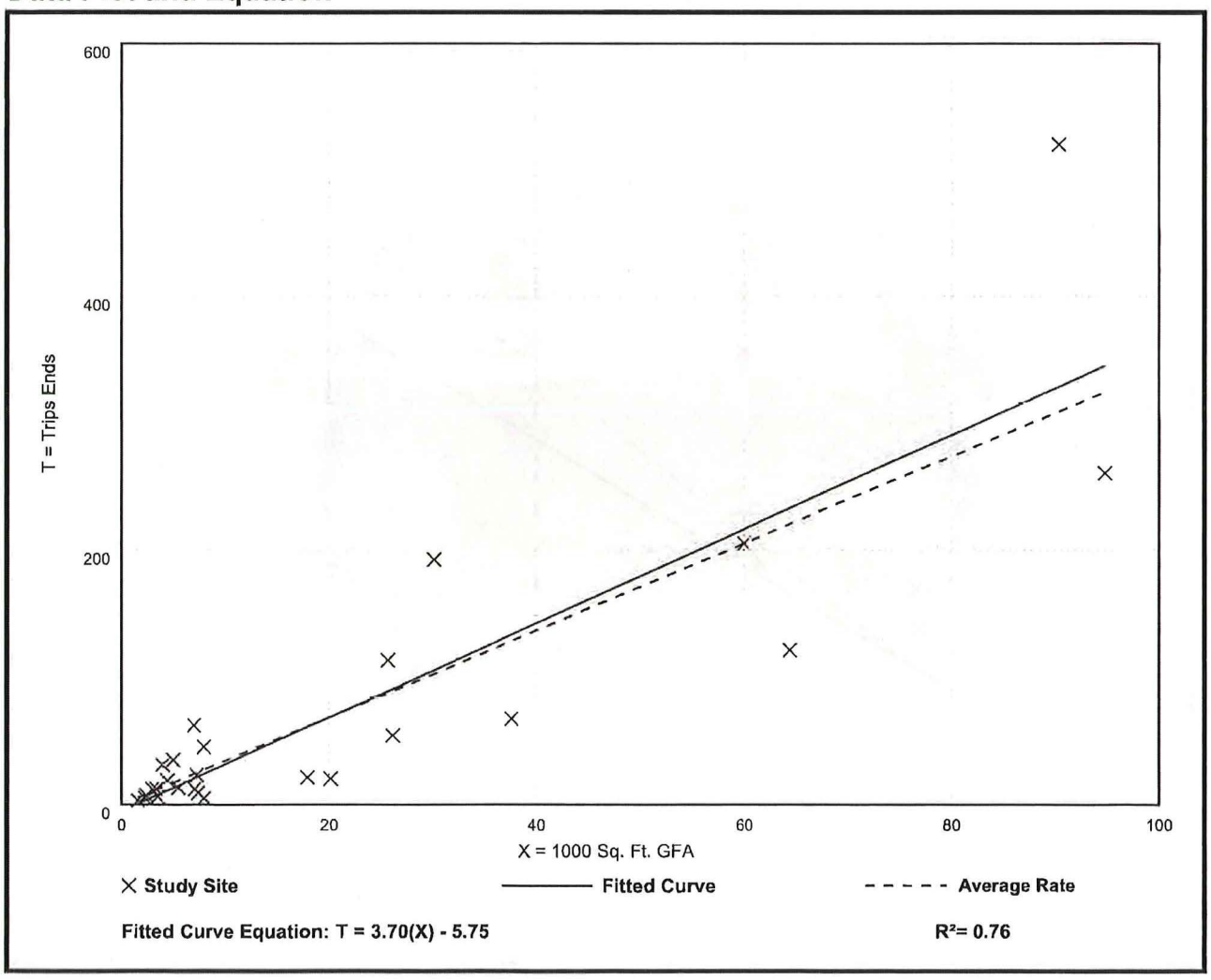
Medical-Dental Office Building - Stand-Alone (720)

Vehicle Trip Ends vs: **1000 Sq. Ft. GFA**
On a: **Weekday,**
Peak Hour of Adjacent Street Traffic,
One Hour Between 4 and 6 p.m.
Setting/Location: **General Urban/Suburban**
Number of Studies: 26
Avg. 1000 Sq. Ft. GFA: 21
Directional Distribution: 30% entering, 70% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
3.42	0.62 - 8.86	1.89

Data Plot and Equation



Fitted Curve Equation: T = 3.70(X) - 5.75

R^2= 0.76

Industrial Park
(130)

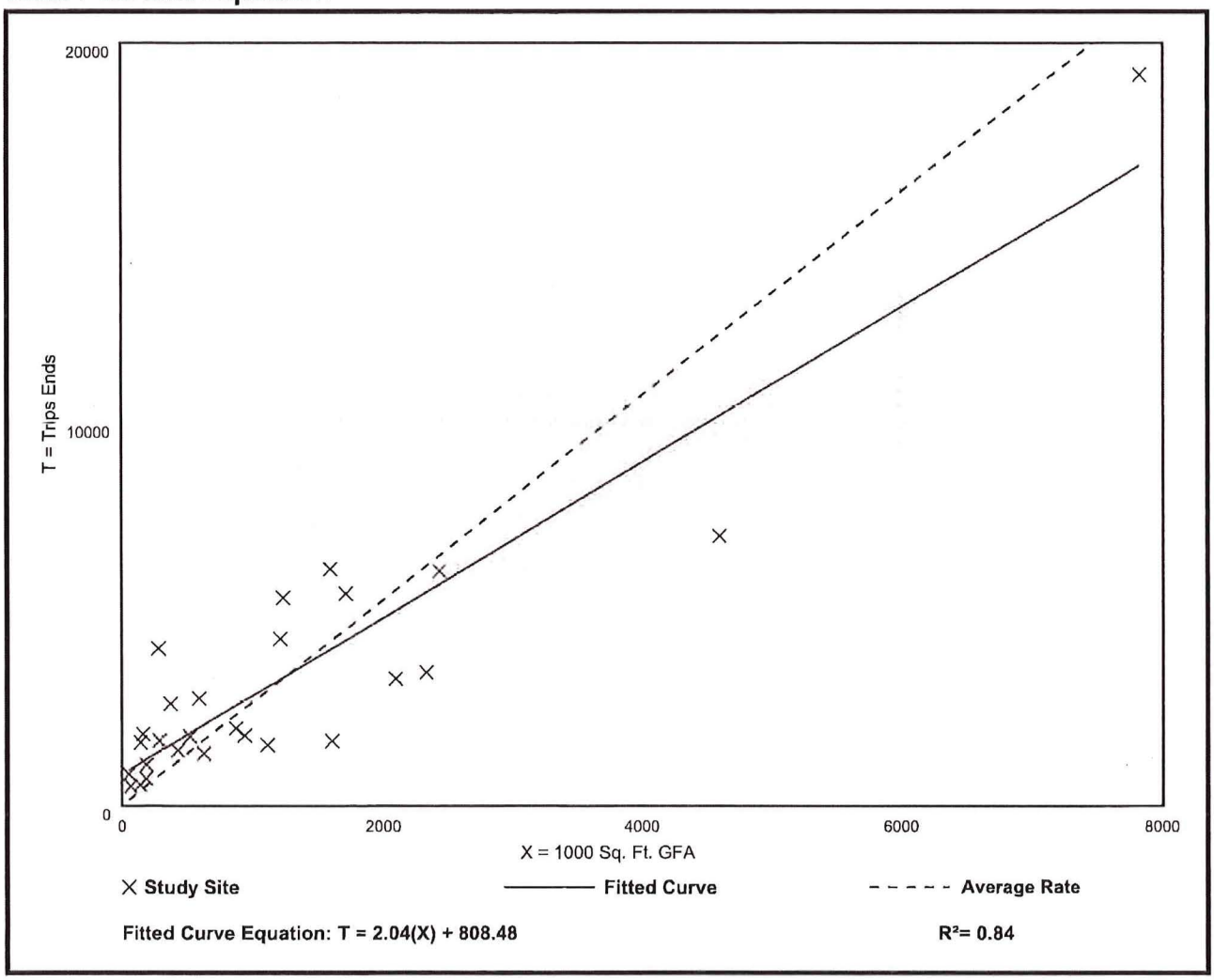
Vehicle Trip Ends vs: 1000 Sq. Ft. GFA
On a: Weekday

Setting/Location: General Urban/Suburban
Number of Studies: 27
Avg. 1000 Sq. Ft. GFA: 1252
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
2.68	1.05 - 14.98	1.84

Data Plot and Equation



Fitted Curve Equation: T = 2.04(X) + 808.48

R^2= 0.84

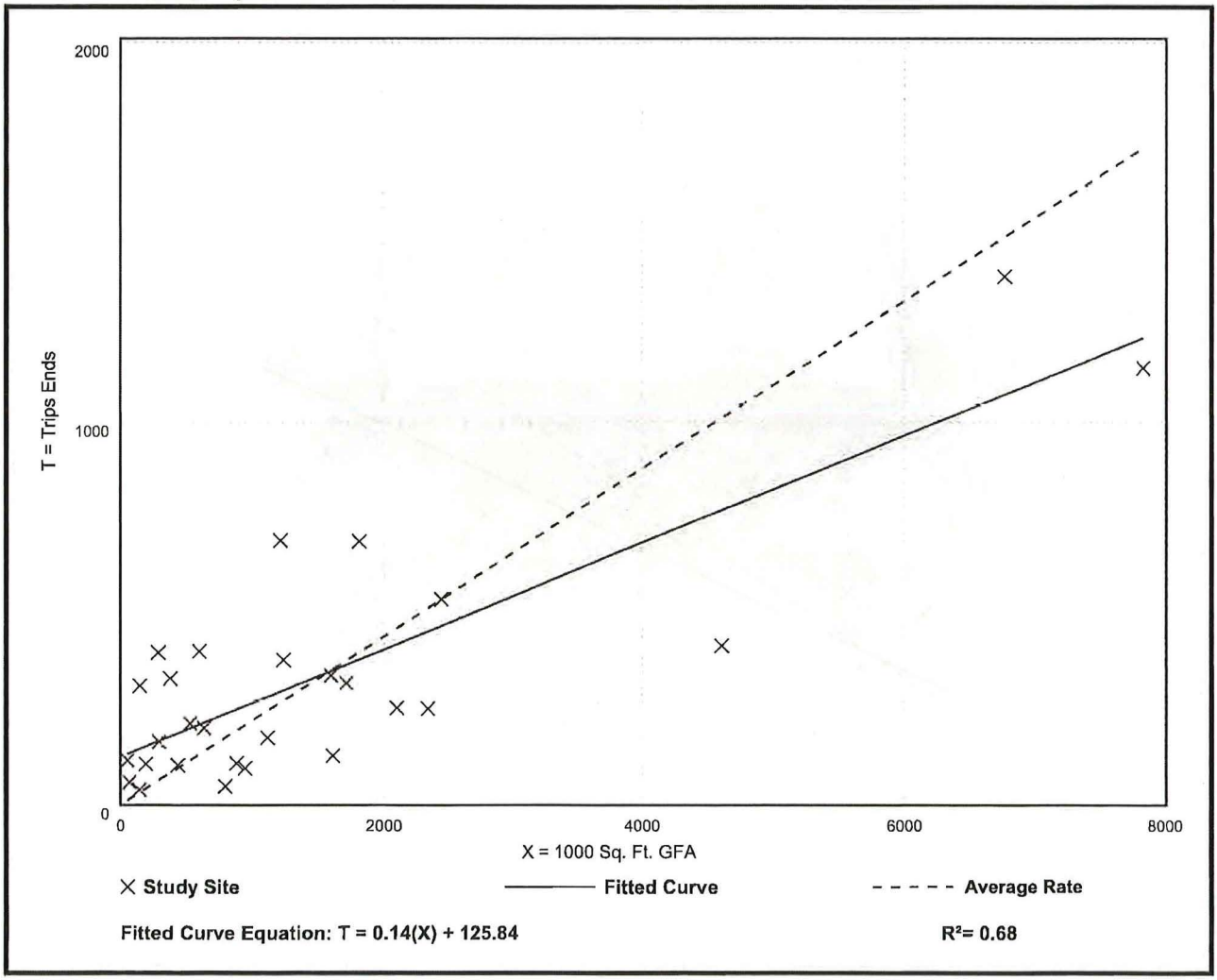
Industrial Park
(130)

Vehicle Trip Ends vs: **1000 Sq. Ft. GFA**
On a: **Weekday,**
Peak Hour of Adjacent Street Traffic,
One Hour Between 7 and 9 a.m.
Setting/Location: **General Urban/Suburban**
Number of Studies: 28
Avg. 1000 Sq. Ft. GFA: 1529
Directional Distribution: 77% entering, 23% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
0.22	0.06 - 2.13	0.22

Data Plot and Equation



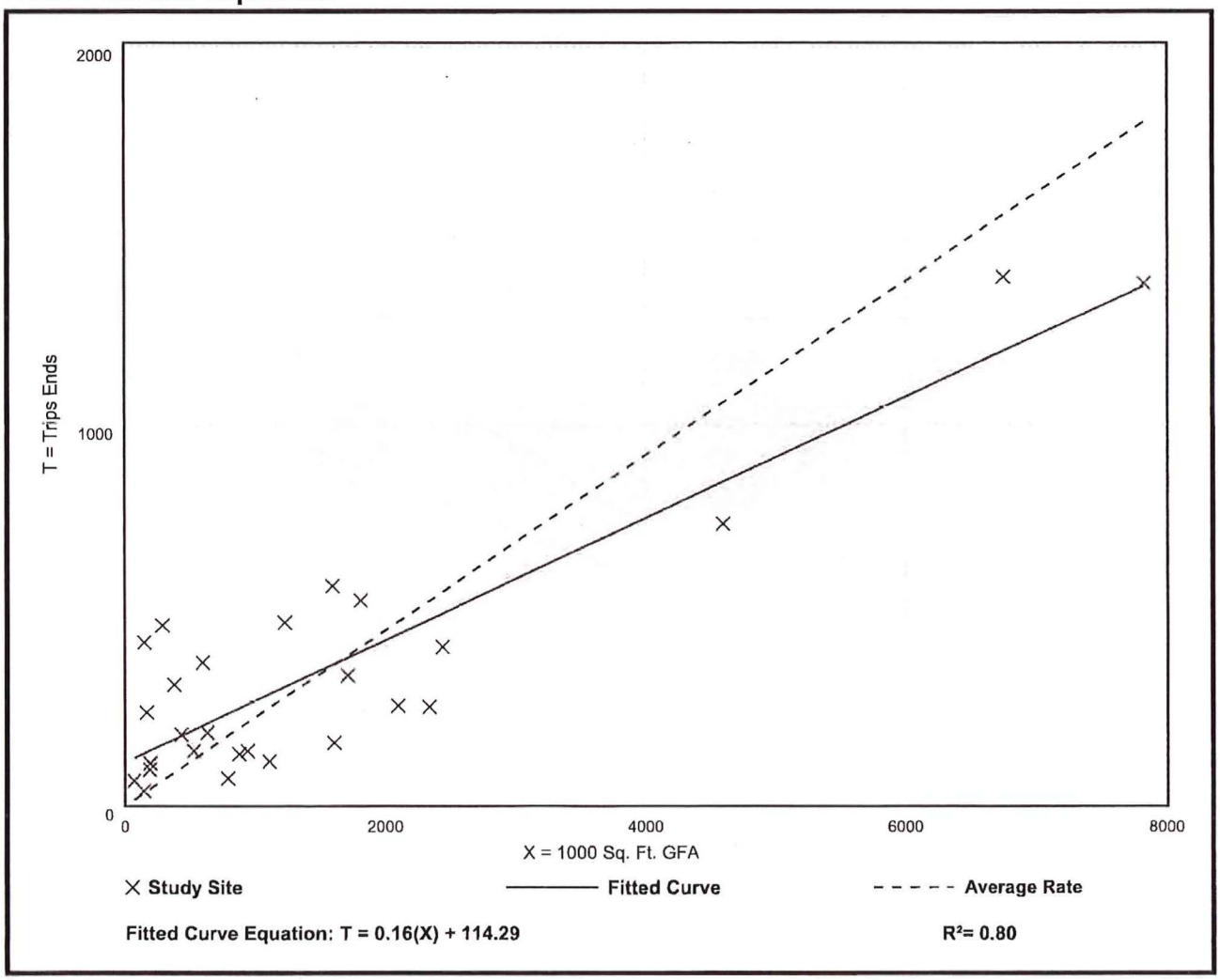
Industrial Park
(130)

Vehicle Trip Ends vs: **1000 Sq. Ft. GFA**
On a: **Weekday,**
Peak Hour of Adjacent Street Traffic,
One Hour Between 4 and 6 p.m.
Setting/Location: **General Urban/Suburban**
Number of Studies: 27
Avg. 1000 Sq. Ft. GFA: 1541
Directional Distribution: 28% entering, 72% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
0.23	0.09 - 2.85	0.25

Data Plot and Equation



Fitted Curve Equation: T = 0.16(X) + 114.29

R^2= 0.80

Hotel
(310)

Vehicle Trip Ends vs: Rooms
On a: Weekday

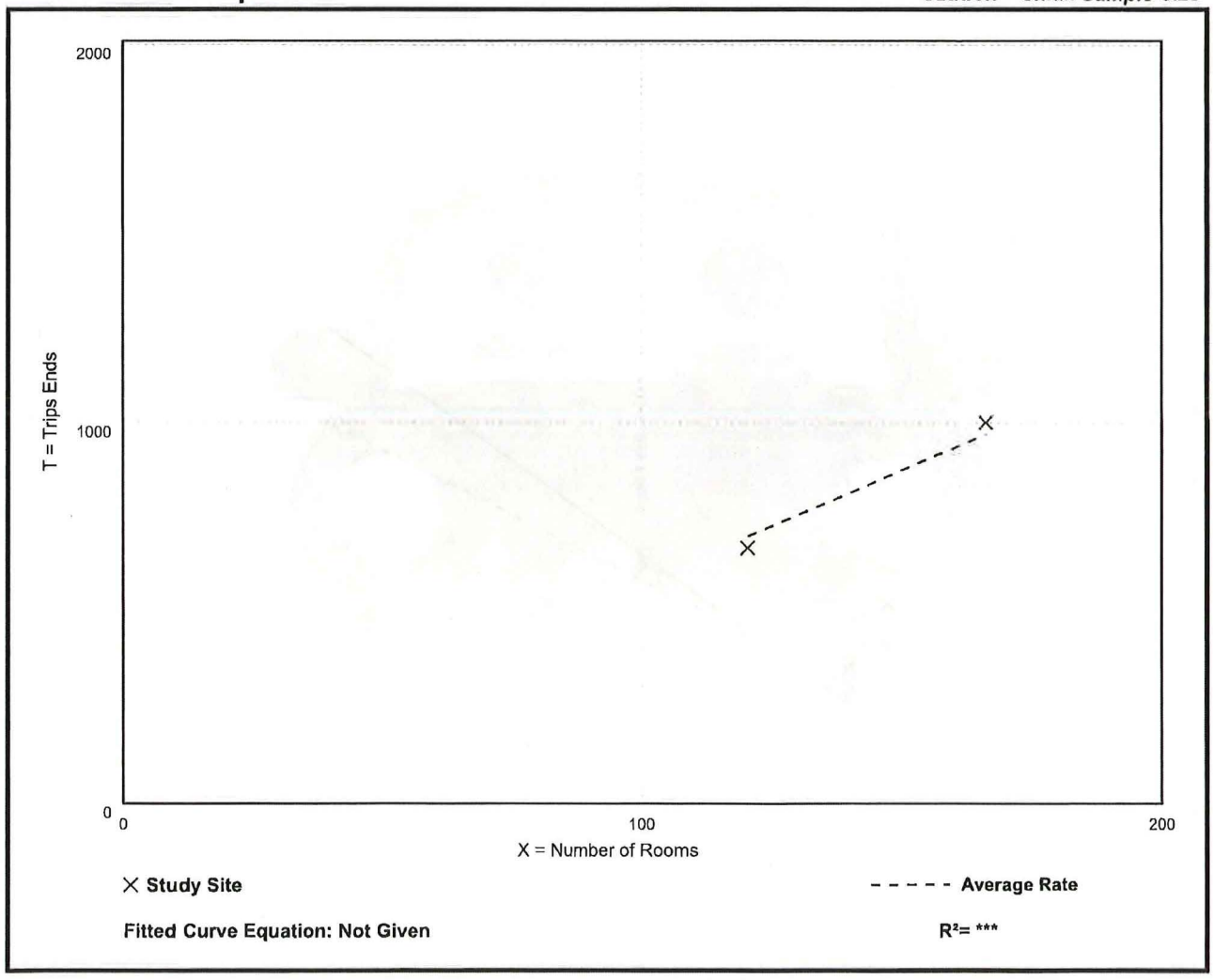
Setting/Location: General Urban/Suburban
Number of Studies: 2
Avg. Num. of Rooms: 143
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per Room

Average Rate	Range of Rates	Standard Deviation
5.84	5.58 - 6.03	***

Data Plot and Equation

Caution – Small Sample Size



× **Study Site**

- - - - - **Average Rate**

Fitted Curve Equation: Not Given

R^2= ***

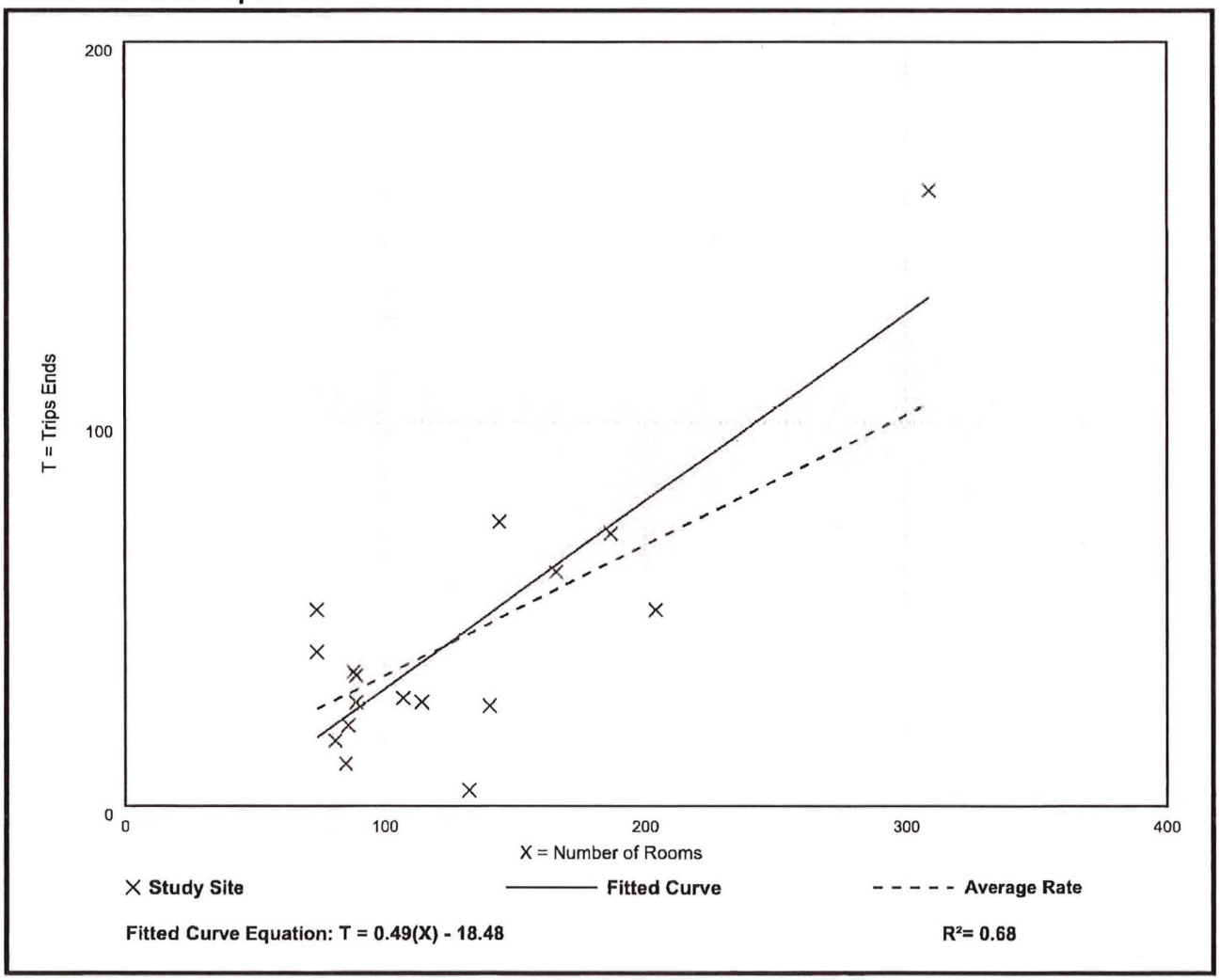
Hotel
(310)

Vehicle Trip Ends vs:	**Rooms**
On a:	**Weekday,**
	Peak Hour of Adjacent Street Traffic,
	One Hour Between 7 and 9 a.m.
Setting/Location:	**General Urban/Suburban**
Number of Studies:	17
Avg. Num. of Rooms:	128
Directional Distribution:	52% entering, 48% exiting

Vehicle Trip Generation per Room

Average Rate	Range of Rates	Standard Deviation
0.34	0.03 - 0.69	0.16

Data Plot and Equation



Fitted Curve Equation: T = 0.49(X) - 18.48

R^2= 0.68

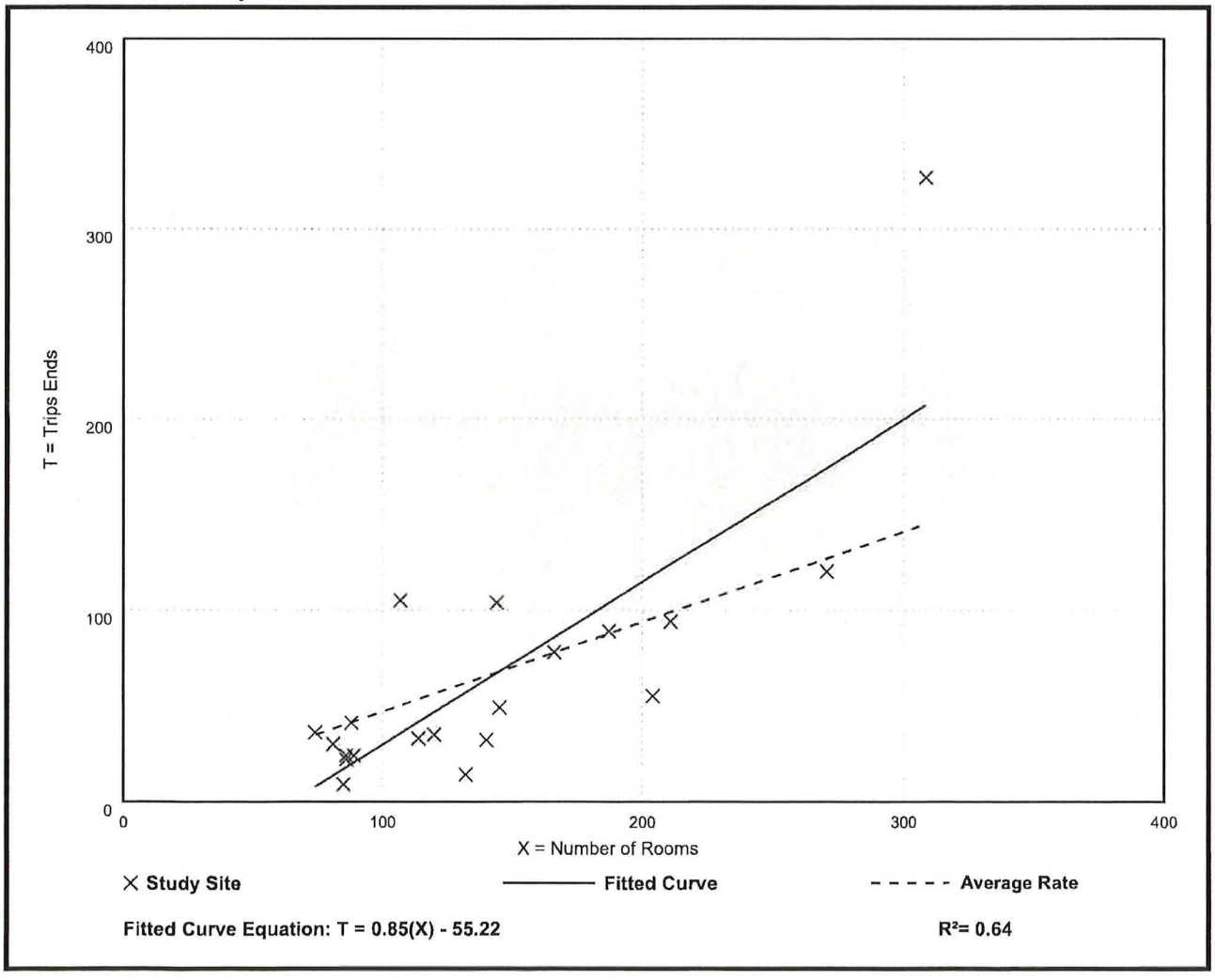
Hotel
(310)

Vehicle Trip Ends vs: **Rooms**
On a: **Weekday,**
Peak Hour of Adjacent Street Traffic,
One Hour Between 4 and 6 p.m.
Setting/Location: **General Urban/Suburban**
Number of Studies: 20
Avg. Num. of Rooms: 142
Directional Distribution: 51% entering, 49% exiting

Vehicle Trip Generation per Room

Average Rate	Range of Rates	Standard Deviation
0.47	0.11 - 1.06	0.28

Data Plot and Equation



Fitted Curve Equation: T = 0.85(X) - 55.22

R^2= 0.64

Lehigh Acres Fire Control and Rescue District

11 Homestead Rd S., Lehigh Acres, Florida 33963
Phone: 239-303-5300 Fax: 239-369-2436

August 11, 2025

Mr. Fred Drovdlic, Planning Director
RVi Planning + Landscape Architecture
8725 Pendery Place- Suite 101
Bradenton, FL 34201

RE: Letter of Service Availability- SR 82 Freeman CPA

Dear Mr. Drovdlic:

Please consider this communication as official documentation confirming that the Lehigh Acres Fire Control and Rescue District is equipped to provide Fire Protection and EMS Transport Services for the parcels listed below, which are located within our Fire District's boundaries.

The following parcels (STRAP Numbers) listed below are situated within the geographical limits of the Lehigh Acres Fire Control and Rescue District:

- **13-45-26-00-00001.002A**
- **13-45-26-00-00001.0020**
- **24-45-26-00-00001.2000**
- **24-45-26-00-00001.3000**
- **24-45-26-00-00001.8000**

Please feel free to contact me if you have any questions and/or concerns.

Sincerely,

Robert A. DiLallo, Fire Chief

Lehigh Acres Fire Control and Rescue District

Cc: Rodolfo Naranjo, Deputy Fire Chief- LAFCRD

Carmine Marceno
Sheriff

State of Florida
County of Lee

"Proud to Serve"

September 9, 2025

Fred Drovdlic
Director of Planning
RVi Planning & Landscape Architecture
1514 Broadway, Suite 201
Fort Myers, FL 33901

Mr. Drovdlic,

The Lee County Sheriff's Office has reviewed your letter of service availability request for a new project consisting of 1,750,00 square feet of commercial, office, hotel, and light industrial uses and a Large-Scale Comprehensive Plan Map Amendment located at 17700 and 17800 State Road 82.

Based on the information provided in your request, the Lee County Sheriff's Office has no objections to this request. This Agency will provide law enforcement services from our 2nd Precinct offices in Lehigh Acres.

Respectfully,

C.J. C 09/09/25

Robert Casale
Colonel, Patrol Bureau

Lee County
Southwest Florida

Board of County Commissioners

August 12, 2025

RVI Planning + Landscape Architecture
Attn: Fred Drovdlic, Planning Director
8725 Pendery Place, Suite 101
Bradenton, FL 34201

RE: COMPREHENSIVE PLAN AMENDMENT (SR 82 FREEMAN CPA)
REQUEST FOR LETTER OF SERVICE AVAILABILITY

Dear Mr. Drovdlic:

The Lee County Solid Waste Department is capable of providing solid waste collection service for the planned project consisting of 1,750,000 sf of Commercial, Office, Hotel, and light industrial uses and a Large-Scale Comprehensive Plan Map Amendment located at 1770 and 17800 State Road 82 through our franchised hauling contractors. Disposal of the solid waste from this development will be accomplished at the Lee County Resource Recovery Facility and the Lee-Hendry Regional Landfill. Plans have been made, allowing for growth, to maintain long-term disposal capacity at these facilities.

Please review Lee County Land Development Code, Chapter 10, Section 261, with requirements for on-site space for placement and servicing of solid waste containers. Please note that the property owner will be responsible for all future applicable solid waste assessments and fees.

If you have any questions, please call me at (239) 533-8007.

Sincerely,

Justin Lighthall

Justin Lighthall
Manager, Public Utilities
Lee County Solid Waste Department

Lee County
Southwest Florida
BOARD OF COUNTY COMMISSIONERS

LeeTran Headquarters
3401 Metro Parkway
Fort Myers, FL 33901
Phone: (239) 533-0340

August 5, 2025

Ross Einsteder
Associate Project Manager
RVi Planning + Landscape Architecture

SR82 Freeman MPD-Brian Freeman
1770 and 17800 State Road 82
Letter of Service Availability Request

Mr. Einsteder,

LeeTran has reviewed your request for service availability regarding a proposed Comprehensive Plan Amendment. After reviewing the site and comparing the location with our existing and planned route locations according to the 2020 Transit Development Plan (TDP), the following has been determined:

The proposed development 1770 and 17800 State Road 82 is not within one-quarter mile of a fixed-route corridor. The 2021 TDP does not identify the need for enhanced or additional services in the area, the developer is not required to connect to or improve transit facilities based on the current Lee County Transit LDC section 10-441.

If you have any questions or require further information, please do not hesitate to contact me at (239) 533-0340 or cmarinodiaz@leegov.com.

Sincerely,

Clarissa Marino Diaz

Clarissa Marino Diaz,

Senior Project Planner

Lee County Transit

SR82 FREEMAN CPA

Exhibit M19 – Justification of Proposed Amendment

I. REQUEST

Brain Freeman ("Applicant") is requesting a Large-Scale Comprehensive Plan Map Amendment to amend Lee Plan maps as follows:

- Future Land Use Map 1-A to move the property from the Wetlands and DR/GR Future Land Use Category (FLUC) to the Tradeport FLUC.
- The Sewer and Water Franchise Area Maps 4-A and 4-B to designate the Property in the Lee County Utilities (LCU) franchise service area.
- Table 1(b) to allocate acreage to the Tradeport future land use category in Southeast Lee County Planning Community.

The CPA will be accompanied by a request to rezone the 186.5 +/- acres from AG-2 to MPD to allow for 1,750,000 sf of commercial, office, hotel, and light industrial uses.

II. FLUC CHANGE JUSTIFICATION

The requested Future Land Use Map Amendment is justified based on existing conditions, demonstrated need, and consistency with the Lee County Comprehensive Plan. The 186.5± acre subject property is located along State Road 82, a major regional transportation corridor, in an area experiencing continued population growth and a documented shortage of employment-generating land uses. Existing commercial development and the availability of larger tracts for employment centers and services in Lehigh Acres and Southeast Lee County is limited in scale and does not adequately support office, light industrial, or diversified employment opportunities, contributing to a job–housing imbalance and long commuter trips.

Per the Lehigh Acres Commercial Study the need for commercial is significant. The document demonstrates that additional commercial development in Lehigh Acres is not speculative—it is mathematically unavoidable due to:

- Sustained population growth
- Concentrated and incomplete commercial patterns
- Lack of regional retail
- Documented acreage shortfalls
- Competition from public and institutional land uses

Additional conclusions include:

- Commercial land supply was designed for a much smaller population and has not scaled with growth.
- Commercial development is spatially mismatched with population distribution, creating service gaps.
- Residents must leave the community for higher-order retail, resulting in retail leakage.
- Even under conservative assumptions, Lehigh Acres faced a significant commercial land shortfall.
- Without proactive designation, commercial land will be displaced by other necessary uses
- Market forces alone cannot resolve the commercial supply imbalance.

Lee Plan *OBJECTIVE 158.2 is to ensure maximum employment opportunities throughout the County. POLICY 158.2.1 specifically states, "Allocate adequate land on the Future Land Use Map and in Table 1(b) to meet the future commercial, industrial, agricultural, residential, and recreational needs of residents and visitors to the County."* As demonstrated in the Lehigh Study and consistent with experience and planning knowledge of Lehigh Acres there is a significant need for the proposed land use. It is good planning that without private intervention would not be able to be accomplished.

The Tradeport FLUC does not permit residential density. Extending density into SE Lee and the DR/GR would be inconsistent with the Lee Plan and could be considered urban sprawl. Conversely, the amendment advances the Economic Development Element by promoting job creation, economic diversification, reduced vehicle miles traveled, and efficient extension of public utilities, while providing long-term community benefits through increased employment opportunities, tax base expansion, and coordinated, master-planned development compatible with surrounding uses.

There are environmentally sensitive areas on site. The Tradeport FLUC has environmental protections as a foundational component of the category and the wetlands will be established through the jurisdictional determination that will part of the map amendment. Additionally, the map change from DG/GR requires ground and surface water resources to be protected. A prominent feature of the northern portion of the property is a raised earthen berm constructed for World War II military training exercises. This triangular berm, occupying approximately 15 acres (about 8 percent of the site), significantly alters the natural hydrology of the northern section by disrupting predevelopment surface-water flow patterns. Similar historic military features are common along the south side of State Highway 82 and are easily identifiable in aerial imagery.

Based on the Florida Land Use and Cover Classification System (FLUCCS) mapping from the South Florida Water Management District (SFWMD), approximately 92.5 acres (roughly 50 percent) of the site are classified as improved pasture. Historic aerial photography indicates that much of this area was intensively drained to support past agricultural activities both on and adjacent to the site. Numerous itches and swales traverse the central and southern portions of the property, reflecting extensive hydrologic modification. These features also facilitated the drainage of historic wetlands, including a large circular wetland in the south-central portion that has been bisected by an east–west drainage ditch, contributing to the site's highly disturbed condition. Remaining natural communities identified by the SFWMD include pine and oak forest, palmetto prairie, hydric pine, wet prairie, and cypress heads. Despite these significant alterations, the property lies within Lee County's Density Reduction/Groundwater Resource (DR/GR) area.

Given the extent of previous disturbance, the proposed development presents an opportunity to restore hydrologic connections and enhance surface water communication with the surrounding DR/GR lands to the south. The stormwater management system will be designed to reestablish historic flow patterns, allowing seasonal high surface waters to move toward the southeastern portion of the property, consistent with predevelopment drainage conditions. The military training berm will be removed, and the reclaimed area will be integrated into the site plan.

In alignment with the project's hydrologic restoration goals, the proposed irrigation system will utilize surface water stored within dedicated stormwater–irrigation supply ponds (wet detention areas) to offset groundwater use. The recycling and reuse of stormwater will not only reduce reliance on groundwater for irrigation but also enhance overall water quality through natural settling and filtration processes. These same ponds will also promote recharge to the underlying aquifer systems, providing additional benefits to the DR/GR area.

The irrigation system will be designed to seasonally supplement stored surface water with groundwater on an as-needed basis, thereby reducing overall groundwater demand while maintaining irrigation reliability. Pre- and post-construction monitoring will be conducted to evaluate hydrologic performance, water quality improvements, and system efficiency. Collectively, these measures advance hydrologic restoration, water conservation, and resource protection consistent with the policies and objectives of the Lee Plan, establishing a robust framework for groundwater and surface-water protection within the DR/GR.

Amendments to Maps 4-A and 4-B are to designate the property in the Lee County Utilities (LCU) service area. At the current time the site does not have sewer or water service. LCU is the closest provider with its franchise area abutting the property to the west. The addition of potable water and sanitary sewer provides imperative services are needed to support the proposed 1,750,000 sf of commercial, office, hotel, and light industrial uses and protect the regional ground water levels. Other urban services that are in place to serve the development, including fire, EMS, police, solid waste, and shared-use paths along SR 82.