



Consolidated Review Comments

Record Number: [DCI2025-00019](#)

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

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

Report Date: 03/03/2026
Record Type: Planned Development
Address: 19551 ARMEDA RD, ALVA, FL 33920
Project Name: Armada Property
Record Description: Rezone 561.63±-acres from Agricultural (AG-2) to Residential Planned Development (RPD).

The Zoning Section has reviewed the submission package for the above-referenced application in accordance with the submittal requirements contained in the Lee County Land Development Code (LDC). Please be advised that the application is insufficient at this time. The application cannot be deemed sufficient for public hearing until the deficiencies provided in the attached comments are addressed.

If you are unable to resubmit within thirty (30) days of this letter, you may request an extension and waive the statutory review deadlines set forth in F.S. 125.022 by completing and returning the [Request for Waiver Form](#).

If you have any questions prior to resubmitting, please contact the lead reviewer for a meeting to discuss the attached comments.

GENERAL COMMENTS:

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

<u>Corrections</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
<u>DOT Review</u>				
Yes	Rev 3 DOT Comments The deviations pertaining to Armada Road are generally supportable to retain the easement as access to a single family residence, however the code reference(s) provided seems to be incorrect. Note: References for Deviations 9 & 11 are correct, however Deviations 10 & 10a reference an incorrect or missing code. See LDC Sec. 10-296(e)(3)e.4 for Non-urban local streets. Stipulated Conditions Will Apply: 1. ☒ Structure Removal: Prior to the issuance of a Local Development Order (LDO) inclusive of changes to Parcel B, all residential structures currently served by Armada Road within the project boundary, (19500 Armada Road being excluded from within Parcel B) must be vacated and demolished to ensure that the transition to a single-user driveway is completed. 2. ☒ Emergency Access: Approval of any deviations by Lee DOT shall not relieve the applicant, easement beneficiaries, or any respective successors in title, from any applicable Fire/EMS requirements necessary to provide emergency access to existing or remaining structures during, or after, the interim phase.	John Podczerwinsky	Open	53
<u>Environmental Review</u>				

<u>Corrections</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
Yes	Environmental Comments: 1. Informational Comment: Revise Deviation 8 to state the correct LDC Section 10-416(d)(9)(b) for development abutting natural waterway. 2. Please revise deviation and justification sheet to include a new deviation for Note 4 on MCP to allow the preservation to act as Type F Buffer. 3. IHMP needs to specify buffer plantings where preserve will act as Type F buffer. Please revise. 4. Please revise MCP hatching for the areas labeled as "S" for floodplain compensating storage. Staff have found inconsistencies between the hatching and labeling. 5. Total project maximum allowable dwelling units increased from 736.48 to 736.92 which would allow for 1 additional dwelling unit. Please provide more information on this increase. 6. Staff have found inconsistencies on the upland restoration acreage. Please revise impact and preserve overlay map (31.53), narrative (34), and page 2 of MCP/ IHMP (31.56). 7. The applicant indicated that no grading is proposed, the map showing the flow of surface water shows the control being used to move the water. Please explain how each section of preserve and restoration area contributes to the movement of water through the site and ensure the restoration plantings are combatable. 8. Please clarify applicants' response to environmental insufficiency comments 4 and 5 regarding compensating storage areas. IHMP has these areas labeled as Created Marsh and Lake. 9. Please revise deviation 10 and 10a LDC Section. LDC Section 10-296(e)(3)(e)(5) does not exist. Please note the subject property is in DR/GR, wetland, and rural future land use categories and needs to meet non-urban local street design in 10-296 (e)(3)(e)(4). Please clarify.	Paige Carroll	Open	55
Yes	Please provide the public information meeting advertisement, minutes of the meeting, sign-in, and any other documentation provided during the meeting. Revise the Floodplain Storage hatching because what is represented on the MCP, the legend, and the open space sheet do not match. The surface water management plan indicates that the subject property will receive surface water from Babcock Ranch. Please provide details of how this water will be handled to not impact the non-graded restoration to support the density incentive. Indicate if the applicant is entering into a property management agreement with Babcock Ranch for the surface water and the emergency access that is impacting approved density and site design in Terrawalk. The resubmittal responses indicate that the restoration will not include grading improvements that will allow the control of the water to pool where it needs to in order to support certain habitats. The natural grade will be utilized to convey water from the north and west to the south and east. Please provide more details to support the density incentive and explain how the development site will be elevated to meet floodplain requirements and not change the impacts to the waterways. This is crucial to support the restoration, preserves, and the density incentive.	Elizabeth Workman	Open	56
<u>Natural Resources Review</u>				

<u>Corrections</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
Yes	Please revise Table 1 within the Ground and Surface Water Resources Report to indicate a Quarterly Sampling Frequency to align with the sampling frequency outlined in “6.3 Surface Water Quality Monitoring” section of the Report.	Nicholas DeFilippo	Open	39
Yes	Please revise the Ground and Surface Water Resources Report to include the following Surface Water Quality Laboratory Parameters: •☒Total Nitrogen •☒Nitrite + Nitrate as Nitrogen (NOX) •☒Nitrite •☒Nitrate •☒Total Phosphorus •☒Chloride •☒Total Dissolved Solids •☒Copper •☒Zinc •☒Lead •☒E. coli •☒Total Hardness •☒Biological Oxygen Demand	Nicholas DeFilippo	Open	40
Yes	Who is the responsible maintenance entity for the compensating storage areas depicted on the MCP? How will the maintenance entity access these areas? Please indicate access easements on MCP as they have potential to impact restoration areas.	Nicholas DeFilippo	Open	41
Yes	Please revise the Water Quality Monitoring to indicate that the "After five years of meeting/exceeding State surface water quality standards, the Developer may amend water quality monitoring and reporting after written request, review, and approval by Division of Natural Resources."	Nicholas DeFilippo	Open	42
Yes	Please provide a cross section at the proposed Trout Creek bridge crossing location demonstrating how County will be able to access the drainage and access easements.	Nicholas DeFilippo	Open	43
Yes	Please provide at a 20ft drainage and access easement along Trout Creek. The width and winding nature of the Creek in this location will not allow maintenance vehicles to navigate within the proposed 10ft drainage and access easement.	Nicholas DeFilippo	Open	44
Yes	Please revise the “6.4 Groundwater Level Monitoring” section of the Ground and Surface Water Report to indicate that the Sandstone Aquifer monitoring wells will be equipped with electronic water level transducers programmed to record data every six hours.	Nicholas DeFilippo	Open	45
Yes	The only proposed access to Development Pod A requires a bridge to be constructed over Trout Creek. Will the bridge be designed to accommodate construction equipment? Will the bridge receive a CC prior to commencement of construction within the remainder of Pod A? How will the developer access Pod A during construction? Staff is asking because of potential impacts to FEMA Floodway.	Nicholas DeFilippo	Open	46
<u>Planning Review</u>				
Yes	The Armeda RPD must stay consistent with the proposed CPA, as changes to the CPA may necessitate changes to the rezone. Planning may add additional comments to the RPD as the CPA progresses.	Katherine Burgess	Open	24
Yes	Planning will not find the proposed RPD sufficient until the CPA has been found sufficient.	Katherine Burgess	Open	25
<u>Zoning Review</u>				

<u>Corrections</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
Yes	Provide the required documentation for the Public Information Meeting. Page 3 of stormwater management plan states that the subject property will be receiving "substantial" off-site runoff from Babcock Ranch parcels to the north and west. Please clarify how the off-site flows will be treated and how they will affect the onsite restoration, preservation, and creation preserve areas that support the density incentives. The draft conditions proposed are requesting the standard State and Federal Wetlands conditions so that a formal jurisdictional wetland determination does not have to be submitted with the zoning. The site has a FEMA floodway bisecting it and tributaries to Trout Creek that scatter a portion of the site. A formal jurisdictional wetland determination must be provided to establish the base density. The results could increase or decrease the base based on the formal j/d.	Elizabeth Workman	Open	54
Yes	Provide a letter of no objection from emergency management and the fire marshal regarding Deviation #1 that demonstrates that EMS and fire has reviewed the design of the one access that includes a bridge over Trout Creek and has the means to access the site when the bridge is obstructed. The applicant is stating in the justification for Deviation #3 that due to the clustering design the lake bank slopes must be 4:1. Other developments that utilized Lee Plan Policy 29.2.4 for density incentives clustered and designed their lakes at 6:1. Staff cannot support Deviation #3 with the justification provided. The applicant will need to provide an additional deviation for the impacts to the natural waterway buffer where roadways / bridges cross the natural waterway buffer. Please see Deviation 3A/3B of Resolution Z-22-022. Staff suggests providing a section in the narrative, environmental report, and/or the hydrological report to explain how the bridge will be designed to allow Trout Creek to be navigable for maintenance. This information must be provided prior to sufficiency and in conjunction with deviation #1 if Parcel B is still pursued.	Elizabeth Workman	Open	57

CORRECTIONS NEEDED:

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

Document: 05. Submittal 2 - Narrative of Request.pdf

<u>Corrections</u>	<u>Page Ref</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
<u>Planning Review</u>					
Yes	13	The subject property contains a flowway, wetlands, and other environmental constraints/hazards. Add an analysis to Policy 5.1.2 to the Lee Plan analysis addressing how the natural conditions of this property will not interfere with resident's safety.	Katherine Burgess	Open	60

Document: 15. Submittal 2 - Preliminary Density Calculations.pdf

<u>Corrections</u>	<u>Page Ref</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
<u>Planning Review</u>					
Yes	1	The preliminary density calculation uses acreage for wetlands, which are not currently depicted on the county's FLUM. As the County does not have the authority to determine whether something is a wetland, under Policy 124.1.2, a jurisdictional determination would be required to utilize an incentive to preserve wetlands in order to determine that there are wetlands to preserve.	Katherine Burgess	Open	61

<u>Corrections</u>	<u>Page Ref</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
Yes	1	The map related to this is in another file in the application materials which make it very difficult to compare. Add a map to this exhibit indicating where all of these areas are to ensure the density calculations are correct and only used once.	Katherine Burgess	Open	62

REVIEWER CONTACT INFORMATION:

<u>Reviewer Name</u>	<u>Reviewer Email</u>	<u>Reviewer Phone</u>
John Podczerwinsky	jpodczerwinsky@leegov.com	-
Nicholas DeFilippo	ndefilippo@leegov.com	239-533-8983
Paige Carroll	pcarroll@leegov.com	-
Katherine Burgess	kburgess@leegov.com	239-533-8362
Elizabeth Workman	eworkman@leegov.com	239-533-8793