

CRA 2025-00013



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TRAFFIC ENGINEERING
TRANSPORTATION PLANNING
SIGNAL SYSTEMS/DESIGN

TRAFFIC IMPACT STATEMENT

FOR

RECEIVED
APR 06 2026

COMMUNITY DEVELOPMENT

BONITA BEACH 50 COMPREHENSIVE PLAN AMENDMENT & REZONING

(PROJECT NO. F2510.11)

PREPARED BY:

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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 amendment to the Comprehensive Land Use Plan and re-zoning approval. The subject site is located along the north side of Bonita Beach Road approximately 1½ miles east of I-75 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 designation on approximately 50-acres from DRGR/Wetlands to Outlying Suburban land use category to permit the development of the subject site with a residential community on the overall 50-acre site. Approximately 34-acres is currently in the DR/GR Future Land Use Category and approximately 13-acres is in the Wetlands Future Land Use Category. With the proposed land use category (Outlying Suburban), and the companion rezoning application that is being filed, the overall 50-acre site will be rezoned to permit up to 94 residential dwelling units.

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 is proposed to Bonita Beach Road via two access connections as shown on the Master Concept Plan.

F2510.11



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.

II. EXISTING CONDITIONS

The subject site is currently vacant. The overall site is generally bordered by vacant land to the north and east, a commercial business to the north, a mobile home park to the west and Bonita Beach Road borders the site to the south.

Bonita Beach Road is a four-lane divided arterial that borders the subject site to the south. Bonita Beach Road has a posted speed limit of 45 mph and is under the jurisdiction of the Lee County Department of Transportation.

III. COMPREHENSIVE PLAN AMENDMENT

The Comprehensive Plan Amendment would change the future land use designation on approximately 50-acres from DR/GR & Wetlands to Outlying Suburban. Under the existing DR/GR and Wetlands land use category, the site could be developed with up to approximately 4 residential dwelling units (1 dwelling unit/10-acres on DR/GR and 1 dwelling unit/20-acres on Wetlands). **Table 1** summarizes the land uses that could be constructed under the existing land use designations and the intensity of uses under the proposed land use designation that is being limited by the companion rezoning application to 94 dwelling units.

**Table 1
Land Uses
Bonita Beach 50**

Existing/ Proposed	Land Use Category	Intensity
Existing	DR/GR & Wetlands	4 Dwelling Units (DR/GR \approx 34 acres @ 1 DU/10-Acres & Wetlands \approx 13 acres @ 1 DU/20 acres)
Proposed	Outlying Suburban	94 Dwelling Units

IV. TRIP GENERATION

The trip generation for the permitted and proposed development was determined by referencing the Institute of Transportation Engineer’s (ITE) report, titled *Trip Generation*, 12th Edition. Land Use Code 210 (Single-Family Detached Housing) was utilized for the trip generation purposes of the permitted and proposed residential uses on the subject site. The trip generation equations utilized for this land use are attached to the Appendix of this report for reference. **Table 2** and **Table 3** outline the anticipated weekday AM and PM peak hour trip generation based on the existing and proposed future land use category, respectively.

**Table 2
Trip Generation
Based on Existing Land Use Category
Bonita Beach 50**

Land Use	Weekday AM Peak Hour			Weekday PM Peak Hour			Daily (2-way)
	In	Out	Total	In	Out	Total	
Single-Family Detached Housing (4 Dwelling Units)	1	2	3	2	2	4	36

**Table 3
Trip Generation
Based on Proposed Land Use Category
Bonita Beach 50**

Land Use	Weekday AM Peak Hour			Weekday PM Peak Hour			Daily (2-way)
	In	Out	Total	In	Out	Total	
Single-Family Detached Housing (94 Dwelling Units)	19	50	69	56	35	91	854

Table 4 indicates the trip generation difference between the proposed and existing land use categories. The long range transportation impact (20-year horizon) and the short range transportation impact (5-year horizon) will be evaluated based on the resultant trip change illustrated in Table 4.

**Table 4
Trip Generation – Resultant Trip Change
Bonita Beach 50**

Land Use	A.M. Peak Hour			P.M. Peak Hour			Daily (2-way)
	In	Out	Total	In	Out	Total	
Proposed Land Use Designation (94 Dwelling Units)	19	50	69	56	35	91	854
Existing Land Use Designation (4 Dwelling Units)	-1	-2	-3	-2	-2	-4	-36
Resultant Trip Change	+18	+48	+66	+54	+33	+87	+818

The resultant trip change in Table 4 indicates that the trip generation will be **increased** in the AM and PM peak hour conditions as a result of this land use change.

V. COMPREHENSIVE PLAN AMENDMENT ANALYSIS

The Comprehensive Plan Amendment would change the future land use designation on the approximately 50-acres from DR/GR & Wetlands to an Outlying Suburban land use category. 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, there were no roadway improvement projects **within a 3-mile radius of the site** shown on the 2045 Cost Feasible Plan.

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, I-75 within the vicinity of the site was shown to be widened to a 10-lane facility. The future 2045 Level of Service Analysis also included the recently extended Logan Boulevard to the south of Bonita Beach Road. These improvements were assumed to be in place for the purposes of the future 2045 Level of Service Analysis. There are no other programmed improvements within the vicinity of the subject site. The Lee County 2045 Highway Cost Feasible Plan map is attached to this report for reference.

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 and then the PM peak hour trips to be generated by additional trips shown in Table 4 were then added to the projected 2045 volumes. The Level of Service for the surrounding roadways was then evaluated. The Level of Service threshold volumes were derived based on the Lee County's *Generalized Peak Hour Directional Service Volumes* table as well as FDOT's *Multi-Modal Generalized Peak Hour Directional Volumes*.

A Level of Service analysis for the 2045 Existing plus Committed (E + C) roadway network is attached to this Memorandum for reference. Table 1A and Table 2A reflect the Level of Service analysis based on the 2045 conditions. The results of the analysis indicate that the addition of the trips as a result of the proposed amendment to the projected 2045 volumes will not cause any other roadway link to fall below the recommended minimum acceptable Level of Service thresholds. Therefore, no changes to the adopted long range transportation plan are required as result of the proposed land use change.

Short Range Impacts (5-year horizon)

The 2023/2024-2027/2028 Lee County Transportation Capital Improvement Plan, FDOT's 5-Year Work Program as well as the City of Bonita Springs Five Year Capital Improvements Plan were reviewed to determine if any future roadway improvements were planned in the vicinity of the subject site in the next five (5) years. Based on the review, there only improvement identified was the widening of I-75 from Collier County to Corkscrew Road to an 8-lane highway. There are no other roadway capacity improvements identified on the aforementioned work programs.

As can be depicted from Table 4 of this report, the proposed map amendment will increase the overall trip generation potential of the subject site by approximately 66 vehicles during the A.M. peak hour and 87 vehicles during the P.M. peak hour. **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 additional trips shown in Table 4. 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*. 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 as well as the traffic data from the latest *Lee County Traffic Count Report*. 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 not cause any roadway link to fall below the minimum acceptable Level of Service standards. Therefore, based on this analysis no modifications will be necessary to the Lee County or the City of Bonita Springs short term capital improvement programs.

The proposed Comprehensive Plan Amendment is to change the future land use designation on approximately 50-acres from DR/GR & Wetlands to Outlying Suburban. Based on the analysis, no modifications will be necessary to the Lee County or FDOT short term capital improvement programs.

VI. ZONING ANALYSIS

An analysis was also completed to support the rezoning of the entire 50-acre subject site from AG-2 to RPD. The site is currently zoned AG-2. If the Comprehensive Plan change was approved on the site, under the existing AG-2 zoning, the site could be developed with up to 94 dwelling units considering the wetlands and other environmental characteristics of the parcel. **Table 5** summarizes the land uses that are being proposed for the proposed rezoning application.

**Table 5
Land Uses
Bonita Beach 50 RPD**

Land Use	Proposed
Residential	94 Dwelling Units

¹ Assumes the Comp Plan Amendment is approved

Access to the subject site is proposed to Bonita Beach Road via a single access drive that will be located opposite Southampton Drive.

The trip generation for the project was based on data from the Institute of Transportation Engineer’s (ITE) report, titled *Trip Generation Manual*, 12th Edition. Land Use Code 210 (Single Family Detached Housing) was utilized to formulate the trip generation for all of the dwelling units since this would represent the “worst case” in terms of trip generation for the residential units. The equations used from this land use are contained in the Appendix of this report for reference.

Table 6 outlines the anticipated weekday A.M. and P.M. peak hour and daily trip generation of the development as currently proposed if the rezoning change is approved.

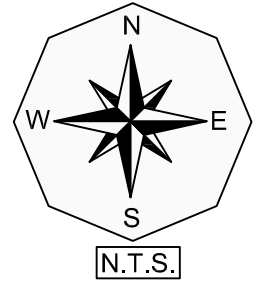
Table 6
Trip Generation – Proposed
Bonita Beach 50 RPD

Land Use	Weekday A.M. Peak Hour			Weekday P.M. Peak Hour			Daily (2-way)
	In	Out	Total	In	Out	Total	
Single-Family Residential (94 Units)	19	50	69	56	35	91	854

The trips the proposed development is anticipated to generate were then assigned to the surrounding roadway network. The net new trips anticipated to be added to the surrounding roadway network were assigned based upon the routes drivers are anticipated to utilize to approach the subject site. **Figure 2** illustrates the percent project distribution and site traffic assignment of the residential related trips to the surrounding roadway network

In order to determine which roadway segments surrounding the site may be significantly impacted as outlined in the Lee County Traffic Impact Statement Guidelines, **Table 5A**, in the Appendix, was created. This table indicates which roadway links will accommodate greater than 10% of the Peak Hour Level of Service “C” volumes. The Level of Service thresholds for the County maintained roadways were obtained from the Lee County’s *Generalized Peak Hour Directional Service Volumes* table. Based on Table 1A, no roadway segments are projected to be significantly impacted as a result of the proposed development.

A horizon year analysis of 2028 was selected as the analysis year to evaluate the future impacts this project will have on the surrounding roadway network. Based on this horizon year, a growth rate was applied to the existing traffic conditions for all roadway links in the study area. The growth rates were obtained through comparisons of annual traffic data obtained from the *City of Bonita Springs Traffic Count Report*. Based on the project distribution illustrated on Figure 2, the link data was analyzed for the year 2028 without the development and year 2028 with the development.



E. TERRY ST

← 15% →

BONITA GRANDE DR.

← 15% →

BONITA BEACH RD.

← 55% →

← 75% →

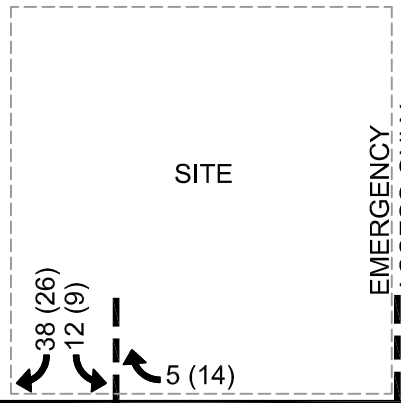
← 25% →

5% TO/FROM WITHIN
BERNWOOD PARK OF
COMMERCE.

(42) 14

(9) 12

(14) 5



SOUTHAMPTON DR

EMERGENCY
ACCESS ONLY

← 5% →

← 25% →

LEGEND

- ← 000 WEEKDAY AM PEAK HOUR SITE TRAFFIC
- ← (000) WEEKDAY PM PEAK HOUR SITE TRAFFIC
- ← 20% → PERCENT TRIP DISTRIBUTION

RESIDENTIAL
TRIP DISTRIBUTION SITE & TRAFFIC ASSIGNMENT
BONITA BEACH 50

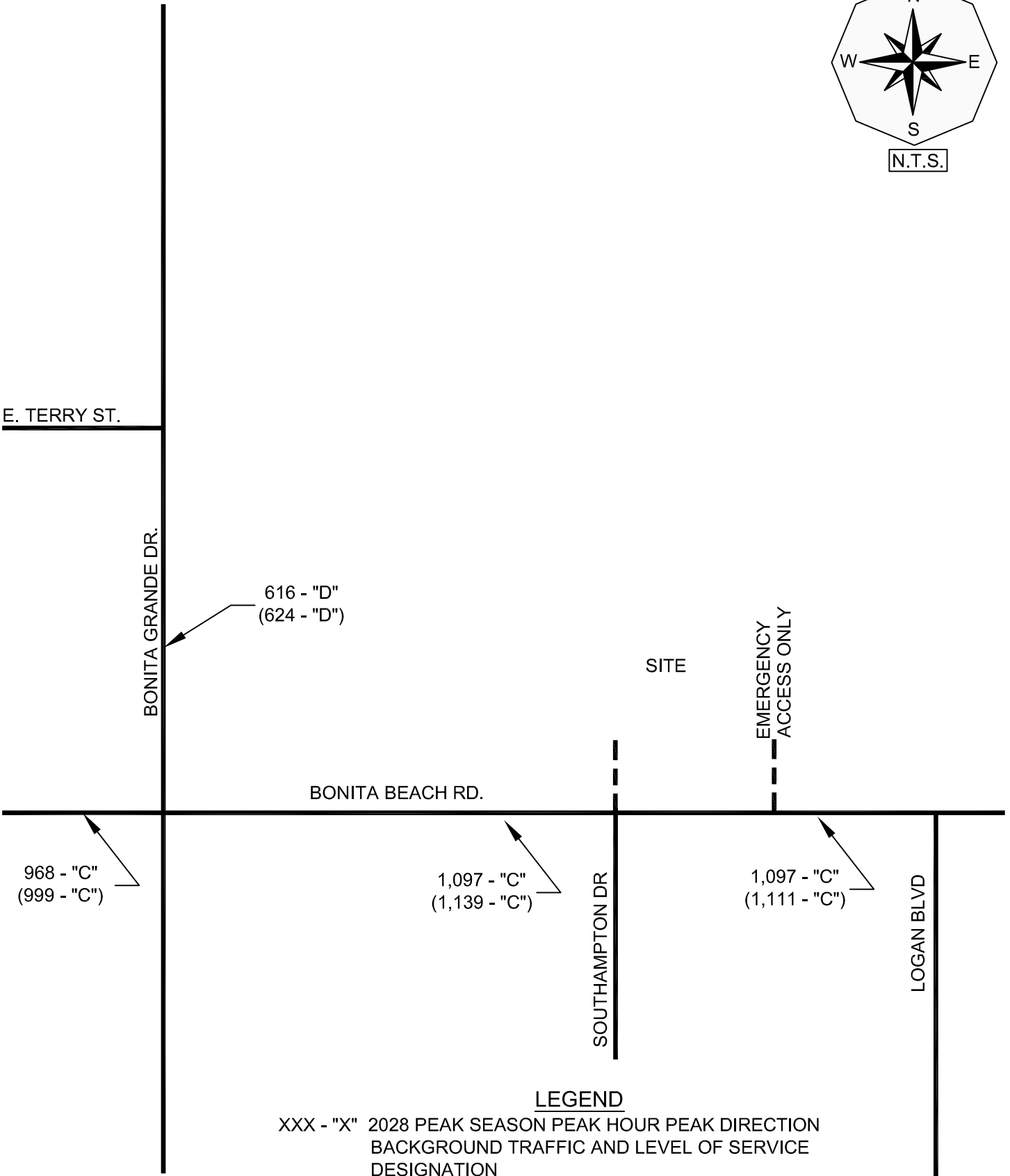
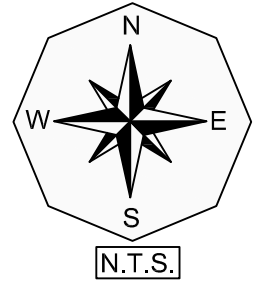
Figure 2

Table 6A in the Appendix of the report indicates the methodology utilized to obtain the year 2028 build-out traffic volumes as well as the growth rate utilized for each roadway segment. The base year traffic volumes for County maintained roadways were obtained from the latest *Lee County Public Facilities Level of Service and Concurrency Report*.

Adverse impacts are defined as a degradation of the Level of Service beyond the adopted Level of Service Thresholds for those links as indicated in Table 5A. In comparing the links' functional classification and calculated 2028 traffic volumes to the Service Volume Tables, it was determined that all analyzed roadways are projected to operate above the minimum adopted Level of Service in 2028 both with and without the proposed development. Therefore, roadway capacity improvements will not be warranted as a result of the additional traffic to be generated by the proposed development.

Figure 3 indicates the year 2028 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 P.M. peak hour with the development traffic added to the roadways. This figure was derived from **Table 6A** contained in the Appendix.

Turn lane improvements at the site access drive intersection will be evaluated at the time the project seeks a Development Order from Lee County.



LEGEND

XXX - "X" 2028 PEAK SEASON PEAK HOUR PEAK DIRECTION
BACKGROUND TRAFFIC AND LEVEL OF SERVICE
DESIGNATION

(XXX -"X") 2028 PEAK SEASON PEAK HOUR PEAK DIRECTION
BACKGROUND TRAFFIC PLUS PROJECT TRAFFIC AND LEVEL
OF SERVICE DESIGNATION

**2028 LEVEL OF SERVICE ANALYSIS
BONITA BEACH 50**

Figure 3

IX. CONCLUSION

The proposed development is located along the north side of Bonita Beach Road 1 ½ miles east of I-75 in Lee County, Florida. Based upon the roadway link Level of Service analysis conducted as a part of this report for both a 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 in that there is sufficient capacity available to accommodate the new trips that will be generated by the proposed development. Therefore, no roadway capacity improvements will be warranted as a result of the additional traffic to be generated by the proposed Comprehensive Plan amendment and rezoning requests.

The 2045 Financially Feasible Roadway network and the short term 5-year Capital Improvement Program currently in place in the Lee County will not require any modification in order to accommodate the proposed Land Use Change. The rezoning analysis also indicates that the subject site will not have an adverse impact on the surrounding roadway network. The project will pay road impact fees to offset the impacts to the area road network as part of the mitigation of the project.

APPENDIX

TABLES 1A & 2A
LONG RANGE TRANSPORTATION
ANALYSIS

**TABLE 1A
LEVEL OF SERVICE THRESHOLDS
2045 LONG RANGE TRANSPORTATION ANALYSIS - BONITA BEACH 50**

ROADWAY	ROADWAY SEGMENT		GENERALIZED SERVICE VOLUMES						
	FROM	TO	2045 E + C NETWORK LANES		LOS A	LOS B	LOS C	LOS D	LOS E
			# Lanes	Roadway Designation	VOLUME	VOLUME	VOLUME	VOLUME	VOLUME
Bonita Beach Road	Bonita Beach Rd End	Valencia Bonita Blvd	4LD	Arterial	0	250	1,840	1,960	1,960
	Valencia Bonita Blvd	Villagewalk Blvd	4LD	Arterial	0	250	1,840	1,960	1,960
	Villagewalk Blvd	Logan Blvd	4LD	Arterial	0	250	1,840	1,960	1,960
	Logan Blvd	Site	4LD	Arterial	0	250	1,840	1,960	1,960
	Site	Southampton Dr	4LD	Arterial	0	250	1,840	1,960	1,960
	Southampton Dr	Bonita Grande Dr	4LD	Arterial	0	250	1,840	1,960	1,960
	Bonita Grande Dr	I-75	4LD	Arterial	0	250	1,840	1,960	1,960
	I-75	Imperial Pkwy	6LD	Arterial	0	400	2,840	2,940	2,940
	Imperial Pkwy	Old 41 Rd	6LD	Arterial	0	400	2,840	2,940	2,940
Bonita Grande Dr	E. Terry St	Bonita Beach Rd	2LN	Collector	0	0	310	660	740
E. Terry St	Bonita Grande Dr	Imperial Pkwy	2LN	Collector	0	0	310	660	740
	Imperial Pkwy	Old 41 Rd	4LD	Collector	0	0	770	1,510	1,600
Imperial Pkwy	Shangrila Rd	E. Terry St	4LD	Controlled Access Facility	0	270	1,970	2,100	2,100
	Bonita Beach Rd	Dellwood Ln	4LD	Arterial	0	250	1,840	1,960	1,960
Logan Blvd	Bonita Beach Rd	Immokalee Rd	2LD	Arterial	0	140	800	860	860
I-75	Corkscrew Rd	Bonita Beach Rd	10LF	Freeway	0	6,080	8,421	10,521	11,140
	Bonita Beach Rd	Immokalee Rd	10LF	Freeway	0	6,080	8,421	10,521	11,140

[] - Denotes the LOS Standard for each roadway segment

* Level of Service Thresholds for Lee County/City arterials/collectors were taken from the Generalized Peak Hour Directional Service Volume tables for Urbanized Areas (dated April 2016)

* Level of Service Thresholds for I-75 were taken from the FDOT's Generalized Peak Hour Directional Service Volume Table.

**TABLE 2A
2045 ROADWAY LINK LEVEL OF SERVICE CALCULATIONS
BONITA BEACH 50 CPA**

Revised 4-2-2026

TOTAL AM PEAK HOUR PROJECT TRAFFIC	69 VPH	IN=	19	OUT=	50
TOTAL PM PEAK HOUR PROJECT TRAFFIC	91 VPH	IN=	56	OUT=	35

<u>ROADWAY</u>	<u>ROADWAY SEGMENT</u> <u>FROM</u> <u>TO</u>		<u>2045</u> <u>FSUTMS</u> <u>AADT</u>	<u>STA #</u>	<u>K-100</u> <u>FACTOR</u>	<u>100TH HIGHEST</u> <u>HOUR PK DIR</u> <u>2-WAY VOLUME</u>	<u>D</u> <u>FACTOR</u>	<u>PM PK HR</u> <u>PEAK</u> <u>DIRECTION</u>	<u>2045</u> <u>PEAK DIRECTION</u> <u>TRAFFIC VOLUMES & LOS</u>			<u>V/C</u> <u>Ratio</u>	<u>PK DIR</u> <u>PM PROJ</u> <u>TRAFFIC</u> ¹	<u>2045 BACKGROUND PLUS PROJ</u> <u>PEAK DIRECTION</u> <u>TRAFFIC VOLUMES & LOS</u>			<u>V/C</u> <u>Ratio</u>
									<u>VOLUME</u>	<u>LOS</u>	<u>Ratio</u>			<u>VOLUME</u>	<u>LOS</u>	<u>Ratio</u>	
Bonita Beach Road	Bonita Beach Rd E. Enc	Valencia Bonita Blvd	25,998	0019	0.090	2,340	0.57	EAST	1,334	C	0.68	0	1,334	C	0.68		
	Valencia Bonita Blvd	Villagewalk Blvd	26,193	0019	0.090	2,357	0.57	EAST	1,343	C	0.69	0	1,343	C	0.69		
	Villagewalk Blvd	Logan Blvd	26,193	0019	0.090	2,357	0.57	EAST	1,343	C	0.69	0	1,343	C	0.69		
	Logan Blvd	Site	23,203	0019	0.090	2,088	0.57	EAST	1,190	C	0.61	14	1,204	C	0.61		
	Site	Southampton Dr	23,203	0019	0.090	2,088	0.57	EAST	1,190	C	0.61	42	1,232	C	0.63		
	Southampton Dr	Bonita Grande Dr	23,203	0019	0.090	2,088	0.57	EAST	1,190	C	0.61	42	1,232	C	0.63		
	Bonita Grande Dr	I-75	39,966	0018	0.090	3,597	0.57	EAST	2,050	F	1.05	31	2,081	F	1.06		
	I-75	Imperial Pkwy	70,211	0017	0.090	6,319	0.57	EAST	3,602	F	1.23	17	3,619	F	1.23		
	Imperial Pkwy	Old 41 Rd	59,401	1230	0.090	5,346	0.56	EAST	2,994	F	1.02	8	3,002	F	1.02		
Bonita Grande Dr	E. Terry St	Bonita Beach Rd	6,726	1202	0.090	605	0.57	NORTH	345	D	0.47	8	353	D	0.48		
E. Terry St	Bonita Grande Dr	Imperial Pkwy	14,531	1203	0.090	1,308	0.57	WEST	746	F	1.01	5	751	F	1.01		
	Imperial Pkwy	Old 41 Rd	29,836	1211	0.090	2,685	0.57	WEST	1,530	E	0.96	6	1,536	E	0.96		
Imperial Pkwy	Shangrila Rd	E. Terry St	28,588	1227	0.140	4,002	0.62	NORTH	2,481	F	1.18	5	2,486	F	1.18		
	Bonita Beach Rd	Dellwood Ln	38,512	0004	0.140	5,392	0.62	NORTH	3,343	F	1.71	6	3,349	F	1.71		
Logan Blvd	Bonita Beach Rd	Immokalee Rd	6,071	0024	0.090	546	0.57	NORTH	311	C	0.36	14	325	C	0.38		
I-75	Corkscrew Rd	Bonita Beach Rd	172,881	120054	0.090	15,559	0.561	NORTH	8,729	D	0.83	8	8,737	D	0.83		
	Bonita Beach Rd	Immokalee Rd	164,883	039950	0.090	14,839	0.524	NORTH	7,776	C	0.74	6	7,782	C	0.74		

1 Project traffic volumes were obtained from Table 3A.

* The K-100 and D factors for County/City roadways were obtained from City of Bonita Springs Traffic Count Report.

** The K-100 and D factors for I-75 were obtained from FDOT's Florida Traffic Online resource.

TABLES 3A & 4A
5-YEAR CIP TRANSPORTATION
ANALYSIS

**TABLE 3A
LEVEL OF SERVICE THRESHOLDS
BONITA BEACH 50**

TOTAL AM PEAK HOUR PROJECT TRAFFIC = 69 VPH IN= 19 OUT= 50
 TOTAL PM PEAK HOUR PROJECT TRAFFIC = 91 VPH IN= 58 OUT= 35

<u>ROADWAY</u>	<u>ROADWAY SEGMENT</u>	<u># LANES</u>						PERCENT		
			<u>LOS A</u>	<u>LOS B</u>	<u>LOS C</u>	<u>LOS D</u>	<u>LOS E</u>	<u>PROJECT TRAFFIC</u>	<u>PROJECT TRAFFIC</u>	<u>PROJ/ LOS C</u>
Bonita Beach Road	E. of Logan Blvd	4LD	0	250	1,840	1,960	1,960	0%	0	0.0%
	E. of Site	4LD	0	250	1,840	1,960	1,960	25%	15	0.8%
	W. of Site	4LD	0	250	1,840	1,960	1,960	75%	44	2.4%
	W. of Southampton Dr.	4LD	0	250	1,840	1,960	1,960	75%	44	2.4%
	W. of Bonita Grande Dr.	4LD	0	250	1,840	1,960	1,960	55%	32	1.7%
Bonita Grande Dr	S. of E. Terry St	2LN	0	0	310	660	740	15%	9	2.8%
E. Terry St	W. of Bonita Grande Dr	2LN	0	0	310	660	740	15%	9	2.8%
Logan Blvd	S. of Bonita Beach Rd	2LD	0	140	800	860	860	25%	15	1.8%

- Denotes the LOS Standard for each roadway segment

* Level of Service Thresholds for Lee County arterials/collectors taken from the Lee County Generalized Peak Hour Directional Service Volume Tables.

**TABLE 4A
LEE COUNTY TRAFFIC COUNTS AND CALCULATIONS
BONITA BEACH 50**

REVISED 4-2-2026

TOTAL PROJECT TRAFFIC AM = 69 VPH IN = 19 OUT= 50
 TOTAL PROJECT TRAFFIC PM = 91 VPH IN= 56 OUT= 35

<u>ROADWAY</u>	<u>ROADWAY SEGMENT</u>	<u>LCDOT PCS OR FDOT SITE #</u>	<u>BASE YR</u>	<u>2021 ADT</u>	<u>YRS OF GROWTH. ¹</u>	<u>ANNUAL RATE</u>	<u>2024</u>	<u>2030</u>		<u>V/C</u>	<u>PERCENT PROJECT TRAFFIC</u>	<u>2030</u>			<u>2030</u>				
							<u>PK HR</u>	<u>PK HR</u>	<u>PK SEASON</u>			<u>BCKGRND</u>		<u>BCKGRND</u>		<u>V/C</u>	<u>+ AM PROJ</u>	<u>V/C</u>	<u>+ PM PROJ</u>
							<u>PK SEASON</u>	<u>PEAK DIRECTION</u>	<u>Ratio</u>		<u>AM PROJ TRAFFIC</u>	<u>PM PROJ TRAFFIC</u>	<u>VOLUME</u>	<u>LOS</u>	<u>Ratio</u>	<u>VOLUME</u>	<u>LOS</u>	<u>Ratio</u>	
Bonita Beach Road	E. of Logan Blvd	0019	15,900	22,600	6	6.04%	145	206	B	0.11	0%	0	0	206	B	0.11	206	B	0.11
	E. of Site	0019	15,900	22,600	6	6.04%	868	1,234	C	0.63	25%	13	14	1,246	C	0.64	1,248	C	0.64
	W. of Site	0019	15,900	22,600	6	6.04%	868	1,234	C	0.63	75%	38	42	1,271	C	0.65	1,276	C	0.65
	W. of Southampton Dr.	0019	15,900	22,600	6	6.04%	868	1,234	C	0.63	75%	38	42	1,271	C	0.65	1,276	C	0.65
	W. of Bonita Grande Dr.	0018	21,400	25,200	6	2.76%	868	1,022	C	0.52	55%	28	31	1,050	C	0.54	1,053	C	0.54
Bonita Grande Dr	S. of E. Terry St	1202	6,200	10,600	10	5.51%	497	686	E	0.93	15%	8	8	693	E	0.94	694	E	0.94

¹ AGR for all roadways was calculated based the historical traffic data obtained from 2025 City of Bonita Springs Traffic Count Report

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

² Current peak hour peak season peak direction traffic volumes for City of Bonita Springs maintained roadways were obtained from the City of Bonita Springs Traffic Count Report

TABLES 5A & 6A
ZONING LEVEL OF SERVICE
ANALYSIS

**TABLE 5A
LEVEL OF SERVICE THRESHOLDS
BONITA BEACH 50**

TOTAL AM PEAK HOUR PROJECT TRAFFIC = 69 VPH IN= 19 OUT= 50
 TOTAL PM PEAK HOUR PROJECT TRAFFIC = 91 VPH IN= 58 OUT= 35

<u>ROADWAY</u>	<u>ROADWAY SEGMENT</u>	<u># LANES</u>	PERCENT							
			<u>LOS A</u>	<u>LOS B</u>	<u>LOS C</u>	<u>LOS D</u>	<u>LOS E</u>	<u>PROJECT TRAFFIC</u>	<u>PROJECT TRAFFIC</u>	<u>PROJ/ LOS C</u>
			<u>VOLUME</u>	<u>VOLUME</u>	<u>VOLUME</u>	<u>VOLUME</u>	<u>VOLUME</u>			
Bonita Beach Road	E. of Logan Blvd	4LD	0	250	1,840	1,960	1,960	0%	0	0.0%
	E. of Site	4LD	0	250	1,840	1,960	1,960	25%	15	0.8%
	W. of Site	4LD	0	250	1,840	1,960	1,960	75%	44	2.4%
	W. of Southampton Dr.	4LD	0	250	1,840	1,960	1,960	75%	44	2.4%
	W. of Bonita Grande Dr.	4LD	0	250	1,840	1,960	1,960	55%	32	1.7%
Bonita Grande Dr	S. of E. Terry St	2LN	0	0	310	660	740	15%	9	2.8%
E. Terry St	W. of Bonita Grande Dr	2LN	0	0	310	660	740	15%	9	2.8%
Logan Blvd	S. of Bonita Beach Rd	2LD	0	140	800	860	860	25%	15	1.8%

- Denotes the LOS Standard for each roadway segment

* Level of Service Thresholds for Lee County arterials/collectors taken from the Lee County Generalized Peak Hour Directional Service Volume Tables.

**TABLE 6A
LEE COUNTY TRAFFIC COUNTS AND CALCULATIONS
BONITA BEACH 50**

TOTAL PROJECT TRAFFIC AM = 69 VPH IN = 19 OUT= 50
TOTAL PROJECT TRAFFIC PM = 91 VPH IN= 56 OUT= 35

ROADWAY	ROADWAY SEGMENT	LCDOT PCS OR FDOT SITE #	BASE YR	2021 ADT	YRS OF GROWTH. ¹	ANNUAL RATE	2024	2028		V/C	PERCENT PROJECT TRAFFIC	2028 BCKGRND			2028 BCKGRND				
							PK HR	PK HR	PK SEASON			VOLUME	LOS	Ratio	VOLUME	LOS	Ratio	VOLUME	LOS
Bonita Beach Road	E. of Logan Blvd	0019	15,900	22,600	6	6.04%	145	183	B	0.09	0%	0	0	183	B	0.09	183	B	0.09
	E. of Site	0019	15,900	22,600	6	6.04%	868	1,097	C	0.56	25%	13	14	1,110	C	0.57	1,111	C	0.57
	W. of Site	0019	15,900	22,600	6	6.04%	868	1,097	C	0.56	75%	38	42	1,135	C	0.58	1,139	C	0.58
	W. of Southampton Dr.	0019	15,900	22,600	6	6.04%	868	1,097	C	0.56	75%	38	42	1,135	C	0.58	1,139	C	0.58
	W. of Bonita Grande Dr.	0018	21,400	25,200	6	2.76%	868	968	C	0.49	55%	28	31	995	C	0.51	999	C	0.51
Bonita Grande Dr	S. of E. Terry St	1202	6,200	10,600	10	5.51%	497	616	D	0.83	15%	8	8	623	D	0.84	624	D	0.84

¹ AGR for all roadways was calculated based the historical traffic data obtained from 2025 City of Bonita Springs Traffic Count Report

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

² Current peak hour peak season peak direction traffic volumes for City of Bonita Springs maintained roadways were obtained from the City of Bonita Springs Traffic Count Report

**LEE COUNTY GENERALIZED
SERVICE VOLUMES**

**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.						

**TRAFFIC DATA FROM CITY OF
BONITA SPRINGS TRAFFIC COUNT
REPORT**

**TABLE 2 HISTORIC TRAFFIC COUNT SUMMARY
CITY OF BONITA SPRINGS, FL**

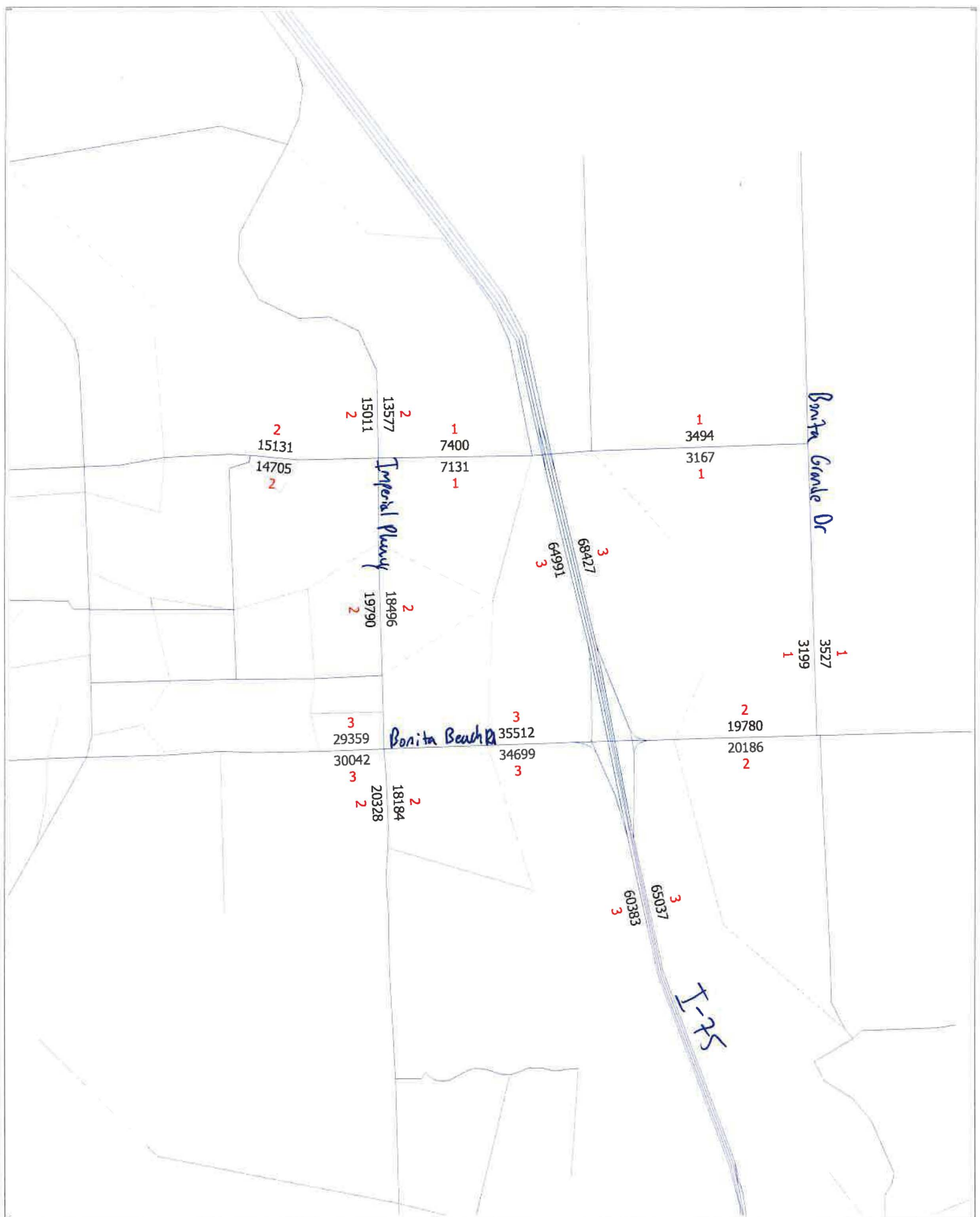


FTE Station Number	Reference Lee County Station Number	Location	Obtained from the Lee County Traffic Count Report 2012							Counts performed by FTE or obtained from Lee County													
			2003	2004	2005	2006	2007	2008	Dec-09	Dec-10	Feb-12	Jan-14	Feb-15	Feb-16	March-17	March-18	April-19	March-20	March-21	March-22	Feb-23	Feb-24	Feb-25
1224	0496	Arroyal Rd N of Bonita Beach Rd	5000	6200	6500	6400	5300	4700	6000	5600	5000	5900	5500	6300	6100	6300	6700	6300	6200	6800	6000	6400	6400
0005	N/A	Bonita Beach Rd between Wisconsin & Michigan St	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	28500	26700	30500	31300	31000	32000	32400	31600	31600
0016	0007	Bonita Beach Rd E. of Vanderbilt Dr	N/A	N/A	N/A	N/A	U/C	23400	24800	23000	23500	24600	25700	25900	30300	25300	28600	29400	26800	30200	23900	26300	27500
1229	0221	Bonita Beach Rd East of Arroyal Rd	N/A	27000	25200	25600	26300	26300	22900	23600	N/A	N/A	N/A	32300	31100	28800	32800	35500	32500	34000	34100	33200	33100
0006	N/A	Bonita Beach Rd W. of Arroyal Rd	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	30700	30500	34500	34900	33000	35600	35200	34400	34700
1230	N/A	Bonita Beach W of Race Track Rd	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	37500	36100	34900	41000	41600	40200	47000	43200	39500	41700
0012**	N/A	Bonita Beach Rd E. of Barefoot Blvd	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	19400	19000	21300	22900	20400	23500	14300	20000	20500
0007**	N/A	Bonita Beach Rd W. of Vanderbilt Dr	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	25300	24200	26800	28600	25400	29300	20100	24200	25400
1202	0519	Bonita Grande Dr N of Bonita Beach Rd	5400	7400	7100	8200	6800	5300	5300	5600	6100	5500	6200	6600	6300	7200	7900	9100	9100	10400	10200	10400	10600
1213	N/A	Cockleshell Dr N of Shangri-La Rd	N/A	N/A	N/A	N/A	N/A	N/A	1900	1900	2300	1700	1900	3900	3700	2100	1600	2200	2000	2100	1900	1100	2300
1207	N/A	Dean St E of Lime St	N/A	N/A	N/A	N/A	N/A	N/A	3400	3100	3200	2800	2700	3000	2900	2600	3400	3500	3600	4100	4600	4700	4600
1208	N/A	Dean St W of Matheson Ave	N/A	N/A	N/A	N/A	N/A	N/A	2800	2300	2400	2000	2000	2500	2400	2100	2600	2600	2800	3300	3700	3800	3800
1205	N/A	E Terry St E of I-75	N/A	N/A	N/A	N/A	N/A	N/A	8100	7900	7900	7800	8100	9000	8600	8700	10100	11200	10200	12200	12900	12500	13100
1211	0271	E Terry St E of Old 41 Rd	9900	12000	13800	U/C	10000	13000	14400	14300	14800	13400	12700	14800	14200	13200	15700	16700	14300	16800	16800	15200	13600
1203	N/A	E Terry St W of Bonita Grande Dr	N/A	N/A	N/A	N/A	N/A	N/A	4600	4500	4600	4400	4500	5600	5400	5700	6900	7900	7300	8900	9000	9000	9400
0013**	N/A	Estero Blvd N. of Hickory Blvd	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	9100	9300	10000	10600	9500	11000	7600	9400	9800
0015**	N/A	Estero Blvd N. of Lovers Key State Park	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	8600	9000	9600	9700	9100	10100	7100	8700	9000
0014**	N/A	Estero Blvd S. of Lovers Key State Park	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	8800	9100	9700	10100	8900	10400	7100	8900	9300
1206	N/A	Imperial Pkwy Between Bonita Beach Rd and E Terry St	N/A	N/A	N/A	N/A	N/A	N/A	N/A	16300	17400	19600	20600	23300	21100	23300	27400	25000	23400	26500	26200	27800	28100
1226	N/A	Imperial Pkwy N/O Shangri-La	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	13000	15900	15300	15700	19900	18500	16600	20500	21400	21500	23000
0004	N/A	Imperial Pkwy S. of Tropic Dr	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	20200	20500	25100	23100	21400	24500	25700	25500	25900
1227	N/A	Imperial Pkwy S/O Shangri-La	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	13800	17200	16600	18000	21400	20000	18000	21600	22600	22600	23700
1209	N/A	Matheson Ave N of Dean St	N/A	N/A	N/A	N/A	N/A	N/A	1900	1700	1500	1800	1500	2100	2100	1600	2000	2000	2100	2100	2300	2400	2400
1204	N/A	Morton Ave N of East Terry St	N/A	N/A	N/A	N/A	N/A	N/A	5800	5400	5700	5300	5300	5900	5700	5600	6600	6600	6000	6800	7300	6800	7000
1223	N/A	Old 41 Rd Between Collier County Line to Bonita Beach Rd	12600	13700	14000	14000	13000	11600	N/A	15200	14600	14100	14900	14700	14200	15200	17600	17500	17600	18900	19300	18400	18600
1222	N/A	Old 41 Rd N of Bonita Beach Rd	16500	18500	17600	17400	18300	13200	15400	15000	14700	13500	13100	9000	8700	10500	12200	12400	12900	13600	13900	13500	14400
1220	N/A	Old 41 Rd N of E/W Terry St	22000	24600	26300	26700	23500	19900	23800	23700	28300	25200	20700	18400	17700	19000	11900	22000	20100	23100	22100	21400	27800
1216	N/A	Old 41 Rd S of US 41	13000	14200	15000	16000	13200	N/A	12000	12500	12200	12100	12000	11900	11500	11800	13500	14200	13700	15000	15100	14800	14800
1228	N/A	Old 41 S/O Bernwood Pkwy	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	13600	13900	13300	13700	15700	16300	15500	16900	16900	17500	17500
0002	N/A	Paradise Rd N. of Shangri-La	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2500	2900	3500	3600	3500	3600	3800	5700	4900
0001	N/A	Pennsylvania Ave E. of Los Amigos Lane	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3100	3500	4200	3600	3100	3600	3700	3500	3600
1221	0494	Pennsylvania Ave W of Old 41 Rd	4100	4000	4900	4500	4300	3000	6300	6400	6000	5600	4400	3400	3300	4300	4800	5900	4100	5100	5000	4600	4700
0003	N/A	Tropical Acers Dr N. of Shangri-La	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	400	500	500	600	400	600	700	800
1212	N/A	Shangri-La Rd E of Old US 41	N/A	N/A	N/A	N/A	N/A	N/A	5000	5100	5100	4900	4600	5800	5600	6300	7100	7500	6600	7200	6700	7700	7800
0010	N/A	US-41, N. of Shopping Center Entrance	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	49200	45600	54200	50600	49300	49600	53500	49700	50800
0009	N/A	US-41, S. of Beaumont Rd	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	35600	35500	44000	41100	39500	41700	43500	40800	41700
0008	N/A	Vanderbilt Dr. N. of Woods Edge Pkwy	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	6900	8400	9500	10200	8900	10200	9200	10100	10400

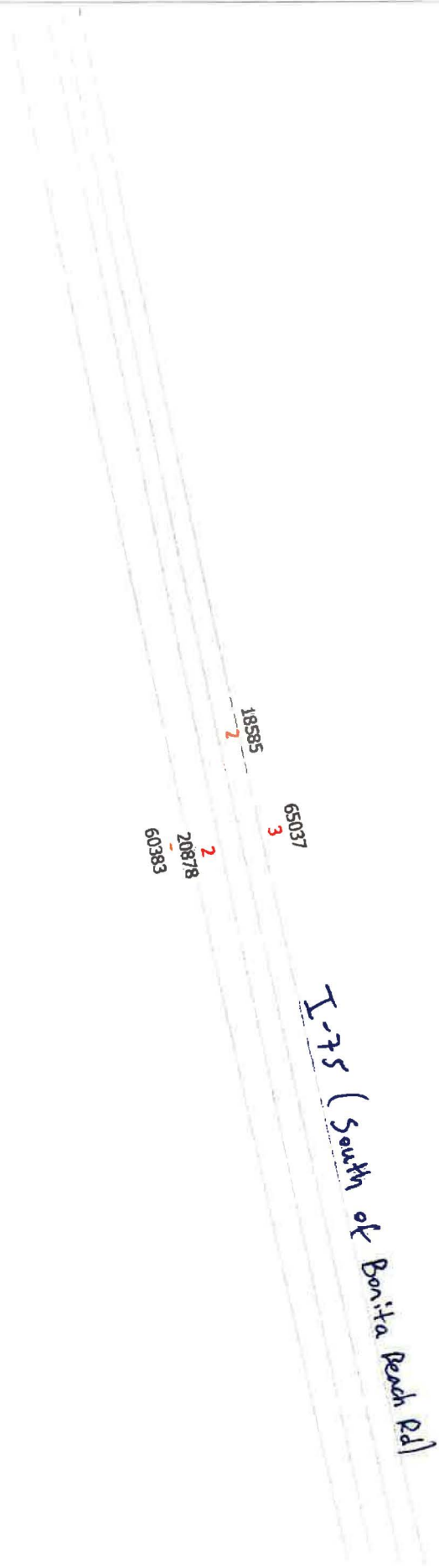
FTE Station Number	Reference Lee County Station Number	Location	Obtained from the Lee County Traffic Count Report 2012						Counts performed by FTE or obtained from Lee County															
			2003	2004	2005	2006	2007	2008	Dec-09	Dec-10	Feb-12	Jan-14	Feb-15	Feb-16	March-17	March-18	April-19	March-20	March-21	March-22	Feb-23	Feb-24	Feb-25	
1219	N/A	W Terry St E of US 41	13300	12000	11400	12200	12200	11600	12700	12800	13900	11000	12400	13300	12800	11700	12700	13100	11200	11700	13200	12500	13900	
1225	N/A	Woods Edge Pkwy W of US 41	N/A	N/A	N/A	N/A	N/A	N/A	4500	5000	3900	5300	4200	4500	4400	4100	5100	5600	5800	5400	5200	5500	5700	
1210	N/A	Longfellow Ln W of Imperial Pkwy	N/A	N/A	N/A	N/A	N/A	N/A	500	300	300	200	U/C	600	500	N/A	800	600	700	700	900	1100	1000	
0017	N/A	Bonita Beach Rd between Imperial Parkway and I-75	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	3700	50300	46600	43600	46100	47400	46600	49800	
0018	N/A	Luke St between Kens Way and Bonita Beach Rd	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	18300	21400	22500	22900	25300	25600	25000	25200	
0019	N/A	Bonita Beach Rd E. of Bonita Grande Dr	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	9700	15900	18800	18900	21200	22200	21600	22600	
0020	N/A	Luke St between Kens Way and Bonita Beach Rd	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	900	800	900	900	800	1200	1100	1300	
0021	N/A	Quails Walk E. of Luke St	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	500	400	500	500	500	400	700	400	
0022	N/A	Imperial Shores Blvd S. of Vanda Dr	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	2200	2200	2500	2600	0	1900	2100	
0023	N/A	Tarpon Avenue E. of Sherry Ln	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	800	700	700	900	1500	900	800	
0024	N/A	Logan Blvd S. of Bonita Beach Rd	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	4300	5400	7200	7900	7800	9300
0025	N/A	Bonita Beach Rd E. of Logan Blvd		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	12200	13200	14300	13600	13500	
1231	N/A	W Terry St W of Old 41 Rd		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	13500	14600	13400	17400	
1232	N/A	Old 41 Rd S of E/W Terry St		N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	14000	14700	13900	14400	

** Collected weekend counts also.

**2045 FSUTMS TRAFFIC VOLUMES ON
AREA NETWORK
(E+C NETWORK)**



2045 LRTP COST FEASIBLE ROADWAY NETWORK LANES & VOLUMES



**LEE COUNTY PUBLIC FACILITIES
LEVEL OF SERVICE 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)

TRIP GENERATION EQUATIONS

Single-Family Detached Housing (210)

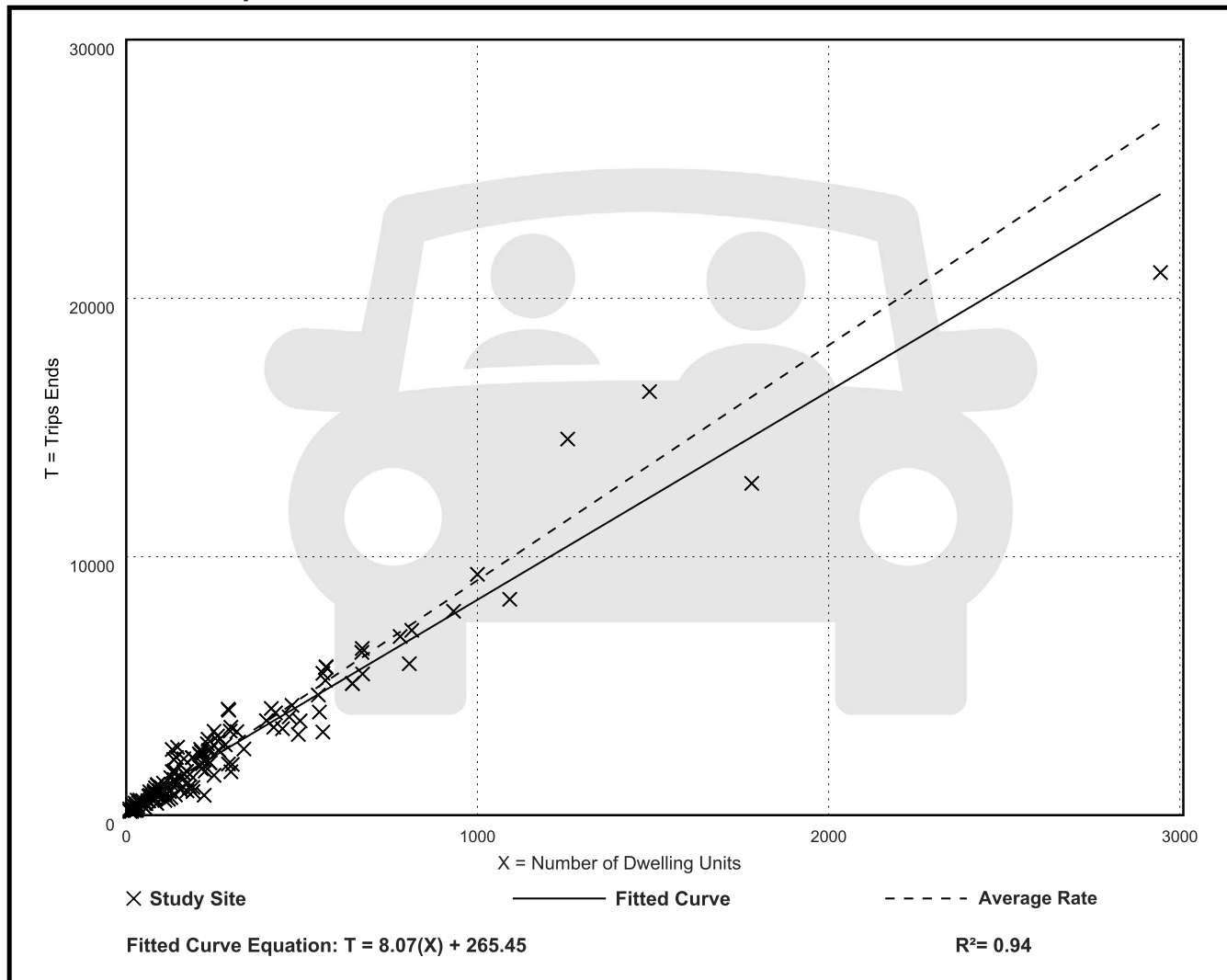
Vehicle Trip Ends vs: Dwelling Units
On a: Weekday

Setting/Location: General Urban/Suburban
Number of Studies: 155
Avg. Num. of Dwelling Units: 261
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
9.09	3.47 - 23.80	2.29

Data Plot and Equation



Single-Family Detached Housing (210)

Vehicle Trip Ends vs: Dwelling Units

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: 153

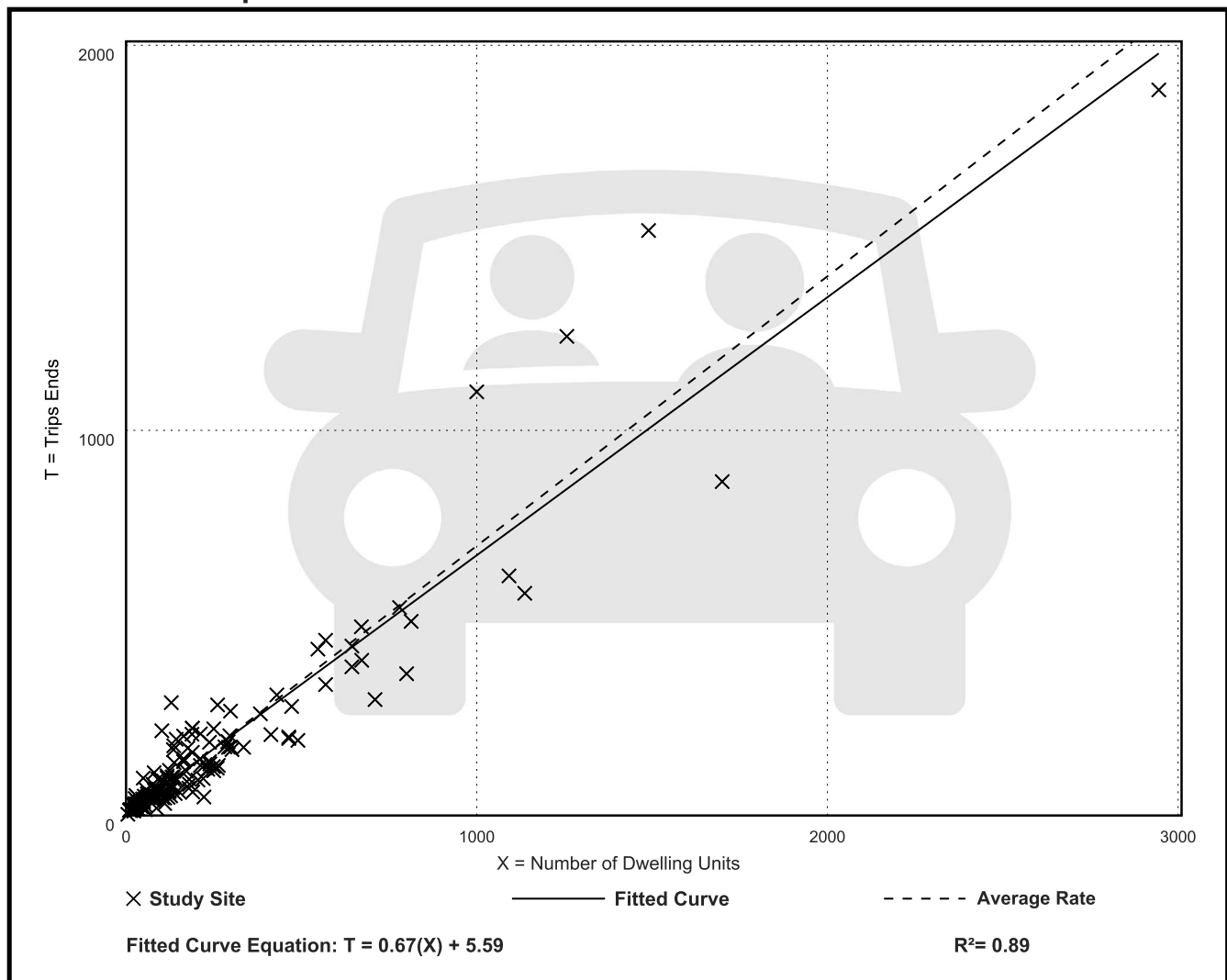
Avg. Num. of Dwelling Units: 239

Directional Distribution: 27% entering, 73% exiting

Vehicle Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
0.70	0.22 - 2.27	0.26

Data Plot and Equation



Single-Family Detached Housing (210)

Vehicle Trip Ends vs: Dwelling Units

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: 166

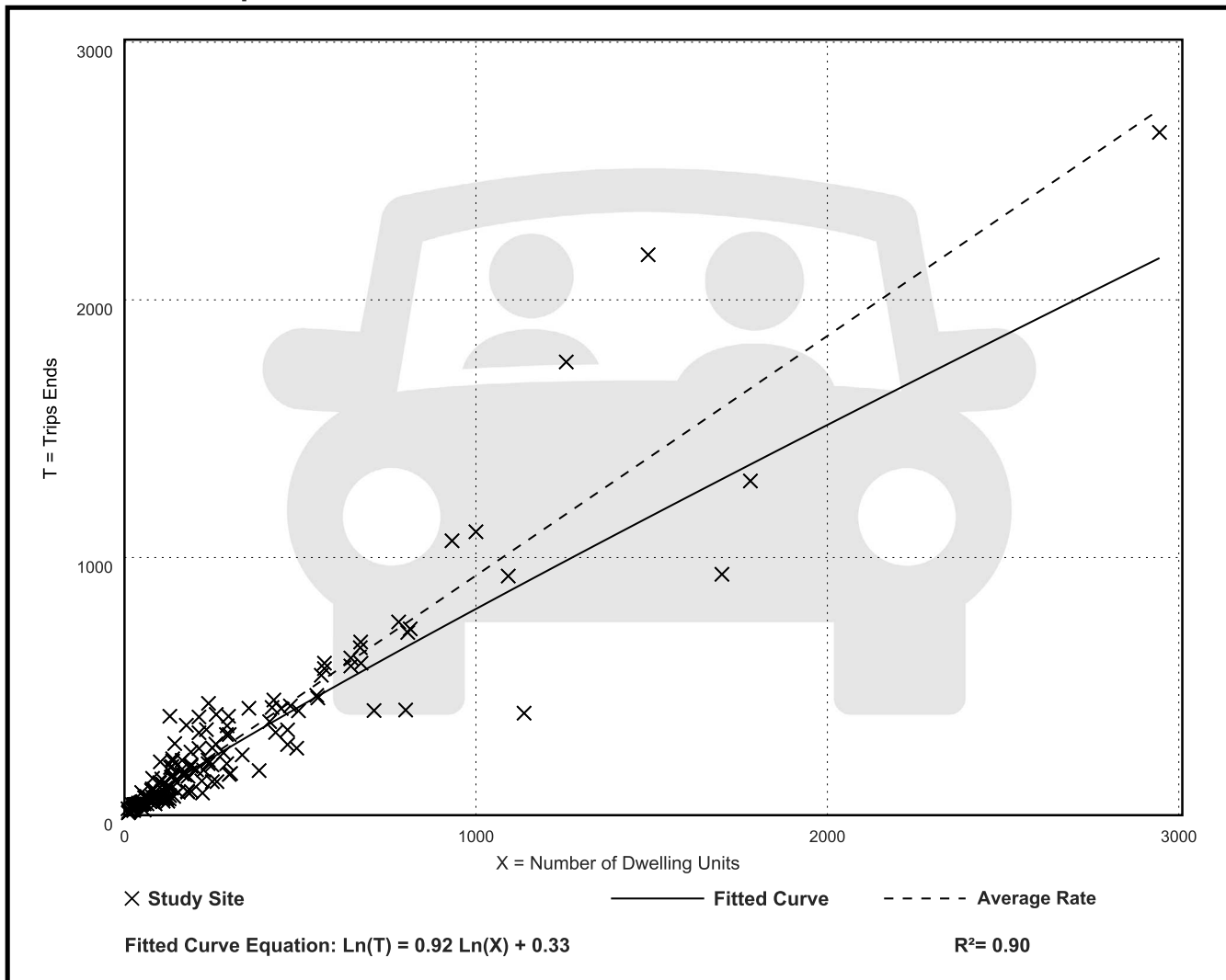
Avg. Num. of Dwelling Units: 266

Directional Distribution: 62% entering, 38% exiting

Vehicle Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
0.93	0.35 - 2.98	0.33

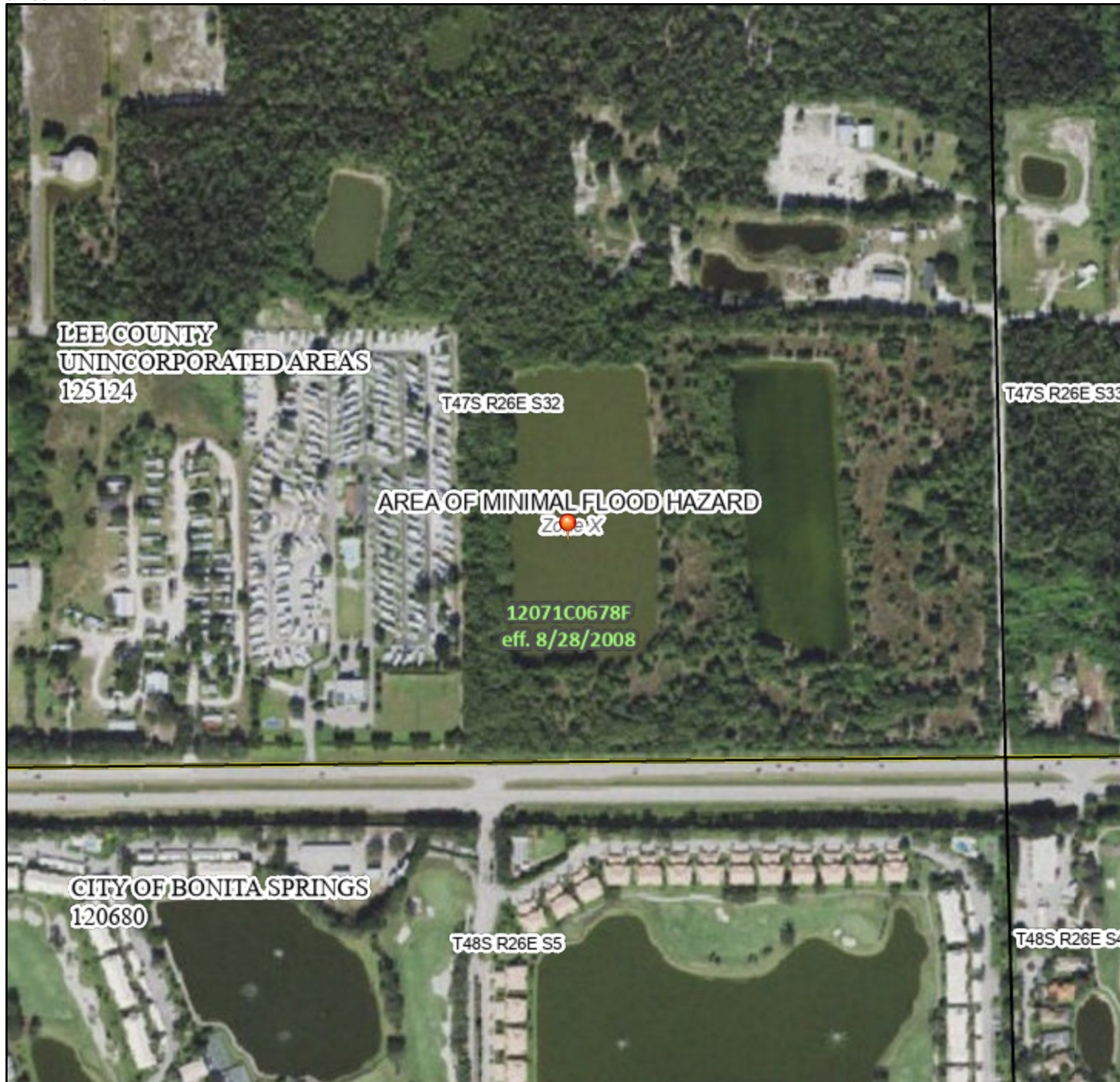
Data Plot and Equation



National Flood Hazard Layer FIRMMette



81°43'54"W 26°20'17"N



Legend

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

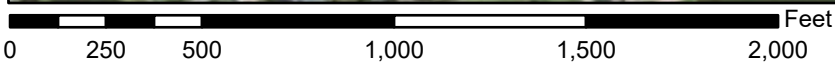
- | | | |
|------------------------------------|--|--|
| SPECIAL FLOOD HAZARD AREAS | | Without Base Flood Elevation (BFE)
<i>Zone A, V, A99</i> |
| | | With BFE or Depth <i>Zone AE, AO, AH, VE, AR</i> |
| | | Regulatory Floodway |
| OTHER AREAS OF FLOOD HAZARD | | 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile <i>Zone X</i> |
| | | Future Conditions 1% Annual Chance Flood Hazard <i>Zone X</i> |
| | | Area with Reduced Flood Risk due to Levee. See Notes. <i>Zone X</i> |
| | | Area with Flood Risk due to Levee <i>Zone D</i> |
| OTHER AREAS | | NO SCREEN Area of Minimal Flood Hazard <i>Zone X</i> |
| | | Effective LOMRs |
| GENERAL STRUCTURES | | Area of Undetermined Flood Hazard <i>Zone D</i> |
| | | Channel, Culvert, or Storm Sewer |
| | | Levee, Dike, or Floodwall |
| OTHER FEATURES | | 20.2 Cross Sections with 1% Annual Chance Water Surface Elevation |
| | | Coastal Transect |
| | | Base Flood Elevation Line (BFE) |
| | | Limit of Study |
| | | Jurisdiction Boundary |
| MAP PANELS | | Coastal Transect Baseline |
| | | Profile Baseline |
| | | Hydrographic Feature |
| | | Digital Data Available |
| | | No Digital Data Available |
| | | Unmapped |
| | | 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 3/30/2026 at 5:54 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.



1:6,000

81°43'17"W 26°19'45"N

Basemap Imagery Source: USGS National Map 2023



SOUTH FLORIDA WATER MANAGEMENT DISTRICT

March 18, 2026

** Delivered via email*

Mike Hueniken *
Pulte Group
24311 Walden Center Drive Suite 300
Bonita Springs, FL 34134

**Subject: 50 Acre Bonita Beach Road Parcels
Petition for Formal Determination of Wetlands and Surface Waters
Permit No. 36-116005-P
Application No. 251107-58926
Lee County**

Your petition for a formal determination of wetlands and other surface waters is approved. This action is taken based on Chapter 373, Part IV of Florida Statutes (F.S.) and the rules in Chapters 62-330 and 62-340, Florida Administrative Code (F.A.C.). Please read this entire agency action thoroughly and understand its contents.

This action is subject to:

- Not receiving a filed request for a Chapter 120, F.S., administrative hearing.
- All referenced Exhibits.

Should you object to these conditions, please refer to the attached "Notice of Rights" which addresses the procedures to be followed if you desire a public hearing or other review of the proposed agency action. Please contact this office if you have any questions concerning this matter. If we do not hear from you in accordance to the "Notice of Rights", we will assume that you concur with the District's action.

CERTIFICATE OF SERVICE

I hereby certify that this Formal Wetland Determination and Notice of Rights have been mailed or electronically submitted to the addressee (and the persons listed on the attached distribution list) on February 19, 2026 in accordance with Section 120.60(3), F.S. Notice was also electronically posted on this date through a link on the home page of the District's website (www.sfwmd.gov/regpermitting).

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Lawrence", enclosed in a blue oval.

Melissa M. Lawrence, P.E.
Bureau Chief, Environmental Resource Bureau

**South Florida Water Management District
Formal Wetland Determination Permit No. 36-116005-P
Date Issued: March 18, 2026**

Project Name: 50 Acre Bonita Beach Road Parcels

Petitioner: Mike Hueniken
Pulte Group
24311 Walden Center Drive
Suite 300
Bonita Springs, FL 34134

Application No. 251107-58926

Location: Lee County, See Exhibit 1

Acres: 47.02

Expiration Date: March 18, 2031

Type: Certified Survey

Project Summary

This application is for a formal determination of the landward extent of wetlands and other surface waters (OSW), pursuant to Rule 62-330.201 Florida Administrative Code (F.A.C.), for a 47.02 acre property known as 50 Acre Bonita Beach Road Parcels. The methodology used for the determination is consistent with Rule 62-340, F.A.C.

Project Site Description

The 47.02-acre property is located in Section 32, Township 47 South, Range 26 East, Lee County, Florida. More specifically, the property is located on the north side of Bonita Beach Road, approximately 1.5 miles east of Interstate 75 (I-75), Bonita Springs, Florida. A Location Map is attached as Exhibit No. 1.0. The property is surrounded by single-family homes and vehicle storage to the north and east; Bonita Beach Road to the south; and a mobile home/RV resort to the west. The property consists of two large lakes/borrow areas and disturbed wetland and upland areas, with varying degrees of exotic vegetation. Minimal native vegetation is present on the property. An aerial photograph depicting the wetlands and OSW and inspection boundaries is attached as Exhibit No. 2.0.

Formal Determination of Wetlands and Other Surface Waters

On November 7, 2025, the District received a request for a formal determination of the boundary of wetlands and OSW on a 47.02-acre property known as 50 Acre Bonita Beach Road Parcels. The landward extent of wetlands and OSW was established by Passarella & Associates, Inc. and field verified by Certified Wetland Evaluator (CWE) Matt Brosious on December 16, 2025. Wetlands and OSW, as defined by Subsection 373.019(27), F.S. and Rule 62-340, F.A.C., were identified on the property. Wetlands were delineated using the definition of a wetland, and A, B and D tests.

Wetlands and Other Surface Waters:

Wetlands delineated on the property totaled 13.01 acres. Wetlands on the property can generally be described as disturbed, with varying degrees of exotic vegetation. Wetland delineation information, including wetland data forms and representative photographs of the wetland and upland areas can be found in the permit file. Wetland data forms were filled out by District staff during the December 16, 2025 field inspection. A certified survey depicting the locations of the wetlands is attached as Exhibit No. 3.0.

Other surface waters delineated on the property totaled 17.15 acres. Other surface waters included two, large, borrow areas and a small pond in the northwest corner of the property. A

certified survey depicting the locations of all OSW is attached as Exhibit No. 3.0. Other surface water information, including data forms and representative photographs of the OSW can be found in the permit file. Data forms were filled out by District staff during the December 16, 2025 field inspection.

Soils and Hydrologic Indicators:

Based on the National Resource Conservation Service (NRCS) data, the property contains two historically mapped hydric soils. The mapped hydric soils are Pompano Fine Sand, Frequently Ponded (Map Unit 27) and Pompano Fine Sand, Ponded-Urban Land Complex (Map Unit 132). A soils map is attached as Exhibit No. 4.0. Soil pit data is included within the wetland delineation data forms, which were filled out during the December 16, 2025 field inspection by District staff.

Hydrologic indicators observed during the inspection included the hydric soil indicators Organic Bodies (A6), which started at the soil's surface, making it a stand alone D-test.

This Formal Determination of Wetlands and Other Surface Waters is the District's determination of the landward extent (boundaries) of wetlands and other surface waters within the property based on the documentation submitted by the Petitioner and field application of Chapter 62-340, F.A.C. This action does not authorize any construction activities or constitute conceptual approval of any anticipated projects or activities in wetlands or other surface waters. It does not in any way establish boundaries of sovereign submerged lands, high water elevations or other elevations/boundaries.

Pursuant to Subsection 373.421 (4), F.S., the Governing Board may revoke the Formal Wetland Determination upon a finding that the Petitioner has submitted inaccurate information to the District.

The Formal Wetland Determination shall be binding for the stated duration provided physical conditions on the property do not change so as to alter the boundaries of wetlands and other surface waters during that period.

Distribution List

Shane Johnson, Passarella and Associates *

Linda Crisafulli *

Florida Department of Environmental Protection SLERC *

Lee County Property Appraiser *

Florida Department of Environmental Protection - Environmental Administrator *

Exhibits

The following exhibits to this permit are incorporated by reference. The exhibits can be viewed by clicking on the links below or by visiting the District's RegPermitting website (www.sfwmd.gov/regpermitting) and searching under this application number 251107-58926.

[Exhibit No. 1.0 Location Map](#)

[Exhibit No. 2.0 Aerial With Wetlands, OSW and Inspection Boundary](#)

[Exhibit No. 3.0 Wetland and OSW Certified Survey](#)

[Exhibit No. 4.0 Soils Map](#)

NOTICE OF RIGHTS

As required by Chapter 120, Florida Statutes, the following provides notice of the opportunities which may be available for administrative hearing pursuant to Sections 120.569 and 120.57, Florida Statutes, or judicial review pursuant to Section 120.68, Florida Statutes, when the substantial interests of a party are determined by an agency. Please note that this Notice of Rights is not intended to provide legal advice. Some of the legal proceedings detailed below may not be applicable or appropriate for your situation. You may wish to consult an attorney regarding your legal rights.

RIGHT TO REQUEST ADMINISTRATIVE HEARING

A person whose substantial interests are or may be affected by the South Florida Water Management District's (District) action has the right to request an administrative hearing on that action pursuant to Sections 120.569 and 120.57, Florida Statutes. Persons seeking a hearing on a District decision which affects or may affect their substantial interests shall file a petition for hearing in accordance with the filing instructions set forth herein within 21 days of receipt of written notice of the decision unless one of the following shorter time periods apply: (1) within 14 days of the notice of consolidated intent to grant or deny concurrently reviewed applications for environmental resource permits and use of sovereign submerged lands pursuant to Section 373.427, Florida Statutes; or (2) within 14 days of service of an Administrative Order pursuant to Section 373.119(1), Florida Statutes. "Receipt of written notice of agency decision" means receipt of written notice through mail, electronic mail, posting, or publication that the District has taken or intends to take final agency action. Any person who receives written notice of a District decision and fails to file a written request for hearing within the timeframe described above waives the right to request a hearing on that decision.

If the District takes final agency action that materially differs from the noticed intended agency decision, persons who may be substantially affected shall, unless otherwise provided by law, have an additional point of entry pursuant to Rule 28-106.111, Florida Administrative Code.

Any person to whom an emergency order is directed pursuant to Section 373.119(2), Florida Statutes, shall comply therewith immediately, but on petition to the board shall be afforded a hearing as soon as possible.

A person may file a request for an extension of time for filing a petition. The District may grant the request for good cause. Requests for extension of time must be filed with the District prior to the deadline for filing a petition for hearing. Such requests for extension shall contain a certificate that the moving party has consulted with all other parties concerning the extension and whether the District and any other parties agree to or oppose the extension. A timely request for an extension of time shall toll the running of the time period for filing a petition until the request is acted upon.

FILING INSTRUCTIONS

A petition for administrative hearing must be filed with the Office of the District Clerk. Filings with the Office of the District Clerk may be made by mail, hand-delivery, or e-mail. Filings by facsimile will not be accepted. A petition for administrative hearing or other document is deemed filed upon receipt during normal business hours by the Office of the District Clerk at the District's headquarters in West Palm Beach, Florida. The District's normal business hours are 8:00 a.m. – 5:00 p.m., excluding weekends and District holidays. Any document received by the Office of the District Clerk after 5:00 p.m. shall be deemed filed as of 8:00 a.m. on the next regular business day.

Additional filing instructions are as follows:

- Filings by mail must be addressed to the Office of the District Clerk, 3301 Gun Club Road, West Palm Beach, Florida 33406.
- Filings by hand-delivery must be delivered to the Office of the District Clerk. Delivery of a petition to the District's security desk does not constitute filing. It will be necessary to request

that the District's security officer contact the Office of the District Clerk. An employee of the District's Clerk's office will receive and process the petition.

- Filings by e-mail must be transmitted to the Office of the District Clerk at clerk@sfwmd.gov. The filing date for a document transmitted by electronic mail shall be the date the Office of the District Clerk receives the complete document.

INITIATION OF ADMINISTRATIVE HEARING

Pursuant to Sections 120.54(5)(b)4. and 120.569(2)(c), Florida Statutes, and Rules 28-106.201 and 28-106.301, Florida Administrative Code, initiation of an administrative hearing shall be made by written petition to the District in legible form and on 8 1/2 by 11 inch white paper. All petitions shall contain:

1. Identification of the action being contested, including the permit number, application number, District file number or any other District identification number, if known.
2. The name, address, any email address, any facsimile number, and telephone number of the petitioner, petitioner's attorney or qualified representative, if any.
3. An explanation of how the petitioner's substantial interests will be affected by the agency determination.
4. A statement of when and how the petitioner received notice of the District's decision.
5. A statement of all disputed issues of material fact. If there are none, the petition must so indicate.
6. A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the District's proposed action.
7. A statement of the specific rules or statutes the petitioner contends require reversal or modification of the District's proposed action.
8. If disputed issues of material fact exist, the statement must also include an explanation of how the alleged facts relate to the specific rules or statutes.
9. A statement of the relief sought by the petitioner, stating precisely the action the petitioner wishes the District to take with respect to the District's proposed action.

MEDIATION




The procedures for pursuing mediation are set forth in Section 120.573, Florida Statutes, and Rules 28-106.111 and 28-106.401–.405, Florida Administrative Code. The District is not proposing mediation for this agency action under Section 120.573, Florida Statutes, at this time.

RIGHT TO SEEK JUDICIAL REVIEW

Pursuant to Section 120.68, Florida Statutes, and in accordance with Florida Rule of Appellate Procedure 9.110, a party who is adversely affected by final District action may seek judicial review of the District's final decision by filing a notice of appeal with the Office of the District Clerk in accordance with the filing instructions set forth herein within 30 days of rendition of the order to be reviewed, and by filing a copy of the notice with the appropriate district court of appeals via the Florida Courts E-Filing Portal.



LEGEND:

-  SFWMW WETLANDS
(13.01 Ac.±)
-  SFWMW "OTHER SURFACE WATERS"
(17.15 Ac.±)
-  SURVEYED WETLAND LINE

WETLAND		OSW	
NO.	ACREAGE	NO.	ACREAGE
1	11.30 Ac.±	1	9.86 Ac.±
2	1.18 Ac.±	2	7.02 Ac.±
3	0.52 Ac.±	3	0.15 Ac.±
TOTAL	13.01 Ac.±	4	0.02 Ac.±
		5	0.04 Ac.±
		6	0.03 Ac.±
		7	0.03 Ac.±
		TOTAL	17.15 Ac.±

NOTES:

AERIAL PHOTOGRAPHS WERE ACQUIRED THROUGH THE LEE COUNTY PROPERTY APPRAISER'S OFFICE WITH A FLIGHT DATE OF JANUARY - MARCH 2025.

PROPERTY BOUNDARY AND SURVEYED WETLAND LINES PER BARRACO AND ASSOCIATES, INC. DRAWING No. 24350S00.DWG DATED OCTOBER 17, 2025.

UPLAND/WETLAND LIMITS WERE FIELD REVIEWED AND APPROVED BY SFWMW STAFF ON DECEMBER 16, 2025.

J:\2024\24CIG4260\SFWMD\ERP\ERP_03020\AERIAL WITH SFWMW WETLANDS MAP_021626.dwg TAB: 17XII-C FEB 16, 2026 - 9:19AM PLOTTED BY: PAULF

REVISIONS	DATE	DRAWN BY P.F.	DATE 2/16/26	13620 Metropolis Avenue Suite 200 Ft. Myers, FL 33912 Phone (239) 274-0067 Fax (239) 274-0069
		DESIGNED BY P.S.	DATE 2/16/26	
		REVIEWED BY S.J.	DATE 2/16/26	



WHITE WILLOW
AERIAL WITH SFWMW WETLANDS MAP

DRAWING No. 24CIG4260
SHEET No. -

DESCRIPTION

Parcel in
Section 32, Township 47 South, Range 26 East
Lee County, Florida

A tract or parcel of land being a portion of those lands described in deeds recorded in Instrument No's. 2020000202076 and 2020000202078, Lee County Records, lying in Section 32, Township 47 South, Range 26 East, Lee County, Florida, said tract or parcel of land being more particularly described as follows:

COMMENCING at the South Quarter corner of said Section 32 run N89°18'48"E along the South line of the Southeast Quarter (SE 1/4) of said Section 32 for 986.51 feet to the Southwest corner of the East Half (E 1/2) of the East Half (E 1/2) of the Southwest Quarter (SW 1/4) of the Southeast Quarter (SE 1/4) of said Section 32; thence run N01°08'32"W along the West line of said Fraction for 25.00 feet to an intersection with the North line of the South 25 feet of said Section 32 and the POINT OF BEGINNING.

From said Point of Beginning continue N01°08'32"W along said West line for 1,268.47 feet to an intersection with South line of the North 25 feet of said Fraction; thence run N89°12'07"E along said South line and continuing along the South line of the North 25 feet of the Southeast Quarter (SE 1/4) of the Southeast Quarter (SE 1/4) of said Section 32 for 1,613.99 feet to an intersection with the West line of the East 25 feet of said Section 32; thence run S01°22'14"E along said West line for 1,266.66 feet to an intersection with the North line of the South 30 feet of said Section 32; thence run S89°18'48"W along said North line for 961.44 feet to an intersection with the West line of the East Three-Quarters (E 3/4) of the Southeast Quarter (SE 1/4) of the Southeast Quarter (SE 1/4) of said Section 32; thence run S01°14'01"E along said West line for 5.00 feet to an intersection with the North line of the South 25 feet of said Section 32; thence run S89°18'48"W along said North line for 657.63 feet to the POINT OF BEGINNING.

Containing 47.02 acres, more or less.

LESS AND EXCEPT Wetland No. 1, Wetland No. 2, and Wetland No. 3:

WETLAND NO. 1

COMMENCING at the Southeast corner of said Section 32 run S89°18'48"W along the South line of said Section 32 for 69.36 feet; thence run N00°41'12"W for 30.00 feet to the POINT OF BEGINNING;

From said Point of Beginning run the following courses and distances: S89°18'48"W for 595.32 feet; N01°55'45"W for 52.07 feet; N30°37'28"W for 57.05 feet; N52°36'49"W for 62.65 feet; N35°55'13"W for 42.80 feet; S89°38'48"W for 37.79 feet; N84°44'42"W for 72.76 feet; S00°33'44"W for 53.26 feet; S14°18'03"W for 68.50 feet; S39°09'51"W for 82.61 feet; S89°18'48"W for 36.54 feet; S01°14'01"E for 5.00 feet; S89°18'48"W for 34.33 feet; N51°28'51"W for 72.25 feet; N59°33'39"W for 30.03 feet; N53°08'39"W for 25.13 feet; N11°32'32"W for 26.74 feet; N02°45'32"E for 25.45 feet; S88°32'20"E for 35.92 feet; S87°24'08"E for 12.19 feet; N66°05'06"E for 55.39 feet; N68°56'03"E for 56.18 feet; N60°49'18"E for 59.12 feet; N72°06'50"E for 74.62 feet; S86°03'20"E for 61.84 feet; N87°28'21"E for 79.87 feet; N83°35'38"E for 58.22 feet; N85°59'55"E for 46.29 feet; S31°53'43"E for 49.09 feet; S49°40'15"E for 68.85 feet; S37°59'05"E for 59.30 feet;

DESCRIPTION (CONTINUED)

S79°10'20"E for 32.89 feet; S67°04'19"E for 28.78 feet; N57°26'00"E for 39.08 feet; N37°46'16"E for 55.52 feet; N04°21'34"W for 44.73 feet; N04°16'48"W for 43.68 feet; S86°23'38"E for 77.38 feet; N76°12'05"E for 35.76 feet; N72°18'36"E for 27.47 feet; N18°28'44"W for 17.86 feet; S82°06'49"W for 26.24 feet; N88°47'36"W for 42.52 feet; N55°52'46"W for 36.60 feet; N46°05'31"W for 50.07 feet; S89°00'13"W for 72.11 feet; N03°09'11"W for 57.95 feet; N06°59'55"W for 83.52 feet; N03°35'48"W for 76.86 feet; N06°45'11"W for 92.38 feet; N01°10'51"E for 76.30 feet; N04°32'31"W for 78.33 feet; N06°12'18"W for 65.40 feet; N05°00'04"W for 84.25 feet; N01°22'08"W for 85.68 feet; N02°11'58"W for 84.09 feet; N05°39'02"W for 48.12 feet; N16°30'44"W for 31.78 feet; N55°59'20"W for 24.00 feet; N75°46'44"W for 24.45 feet; S87°58'47"W for 65.75 feet; N87°19'34"W for 54.45 feet; N89°56'31"W for 79.71 feet; S83°57'42"W for 63.03 feet; N46°38'14"W for 17.46 feet; N89°43'29"W for 57.05 feet; S70°09'49"W for 41.60 feet; S04°49'27"W for 54.82 feet; S11°00'20"E for 68.92 feet; S38°10'25"W for 32.75 feet; S40°26'23"W for 36.37 feet; S10°33'36"E for 28.68 feet; S51°10'23"E for 39.45 feet; S16°25'20"E for 70.05 feet; S36°55'45"E for 48.32 feet; S30°46'09"W for 28.76 feet; S13°46'13"E for 45.09 feet; S17°46'07"E for 55.55 feet; N65°49'52"W for 55.41 feet; N18°51'27"W for 77.25 feet; N29°42'04"W for 46.11 feet; N12°00'20"W for 68.54 feet; N20°50'09"W for 63.00 feet; N02°00'10"W for 58.38 feet; N00°26'17"E for 59.61 feet; N82°45'51"W for 45.05 feet; S28°43'10"W for 33.72 feet; S53°59'51"E for 20.91 feet; S03°45'04"E for 62.19 feet; S00°35'59"W for 44.72 feet; S19°07'45"W for 49.69 feet; N11°21'27"W for 77.44 feet; N02°02'23"W for 88.60 feet; N08°57'14"W for 64.89 feet; N23°37'04"W for 27.80 feet; N57°52'32"W for 24.57 feet; N63°09'51"E for 41.67 feet; N41°00'32"E for 65.36 feet; S03°45'58"E for 29.36 feet; S12°05'10"E for 16.22 feet; S72°03'16"E for 30.88 feet; N14°23'33"E for 50.77 feet; N85°34'48"E for 105.80 feet; S89°13'37"E for 116.98 feet; S89°24'24"E for 130.81 feet; S82°23'20"E for 91.53 feet; N87°27'12"E for 85.37 feet; N85°26'54"E for 87.17 feet; N89°28'25"E for 75.94 feet; S61°40'58"E for 33.45 feet; S00°19'13"W for 58.97 feet; S03°44'30"W for 77.61 feet; S13°33'07"E for 83.62 feet; S02°37'53"E for 62.75 feet; S05°06'20"W for 50.18 feet; S02°39'44"W for 57.82 feet; S02°07'42"E for 51.95 feet; S07°57'37"E for 84.34 feet; S44°51'10"W for 33.43 feet; S65°03'02"W for 28.11 feet; S01°43'45"W for 16.33 feet; S55°12'42"E for 33.75 feet; N39°36'06"E for 35.18 feet; S03°41'07"E for 24.10 feet; S06°02'26"W for 75.13 feet; S00°08'10"E for 76.98 feet; S07°52'19"E for 70.66 feet; S10°07'54"E for 60.61 feet; S15°36'28"E for 65.61 feet; N85°50'17"E for 16.83 feet; N05°02'44"W for 47.30 feet; N08°46'36"W for 69.64 feet; N11°55'40"W for 76.12 feet; N01°27'09"E for 64.97 feet; N81°05'20"E for 37.31 feet; N05°16'34"E for 78.85 feet; S35°53'58"E for 37.38 feet; S15°06'51"E for 44.30 feet; S57°55'56"E for 33.78 feet; S89°00'41"E for 17.34 feet; N09°09'33"W for 45.27 feet; S66°29'14"E for 29.69 feet; S13°16'07"W for 29.27 feet; S31°00'38"E for 40.92 feet; S07°23'52"E for 56.28 feet; S02°46'02"W for 36.68 feet; S01°32'50"W for 64.28 feet; S03°19'58"E for 69.42 feet; S01°07'56"E for 52.54 feet; S02°14'32"E for 64.04 feet; S04°21'53"E for 62.87 feet; S08°15'05"W for 98.01 feet to the POINT OF BEGINNING.

Containing 11.30 acres, more or less.

WETLAND NO. 2

COMMENCING at the Southeast corner of said Section 32 run N01°22'14"W along the East line of said Section 32 for 1296.96 feet; thence run S89°00'00"W for 70.91 feet to the POINT OF BEGINNING;

DESCRIPTION (CONTINUED)

From said Point of Beginning run the following courses and distances: S31°17'43"W for 7.94 feet; S05°23'15"E for 51.31 feet; S01°07'05"E for 80.41 feet; S25°29'05"E for 47.00 feet; S13°30'49"W for 46.13 feet; S01°49'28"E for 90.39 feet; S58°05'57"W for 58.49 feet; S72°16'33"W for 51.24 feet; S80°50'10"W for 29.76 feet; N25°33'44"W for 25.62 feet; N03°08'13"W for 95.19 feet; N10°39'09"W for 72.54 feet; N02°32'00"E for 66.81 feet; N03°10'50"E for 69.10 feet; N21°22'04"W for 36.27 feet; N89°58'27"W for 70.37 feet; N88°25'43"W for 53.08 feet; S86°12'59"W for 98.60 feet; N85°03'01"W for 75.33 feet; N86°37'23"W for 6.43 feet; N89°12'07"E for 452.67 feet to the POINT OF BEGINNING. Containing 1.18 acres, more or less.

WETLAND NO. 3

COMMENCING at Point "A" run N18°37'28"W for 150.44 feet to the POINT OF BEGINNING;

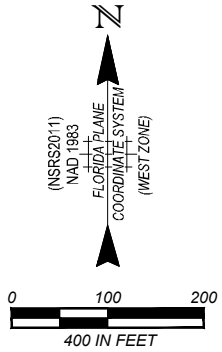
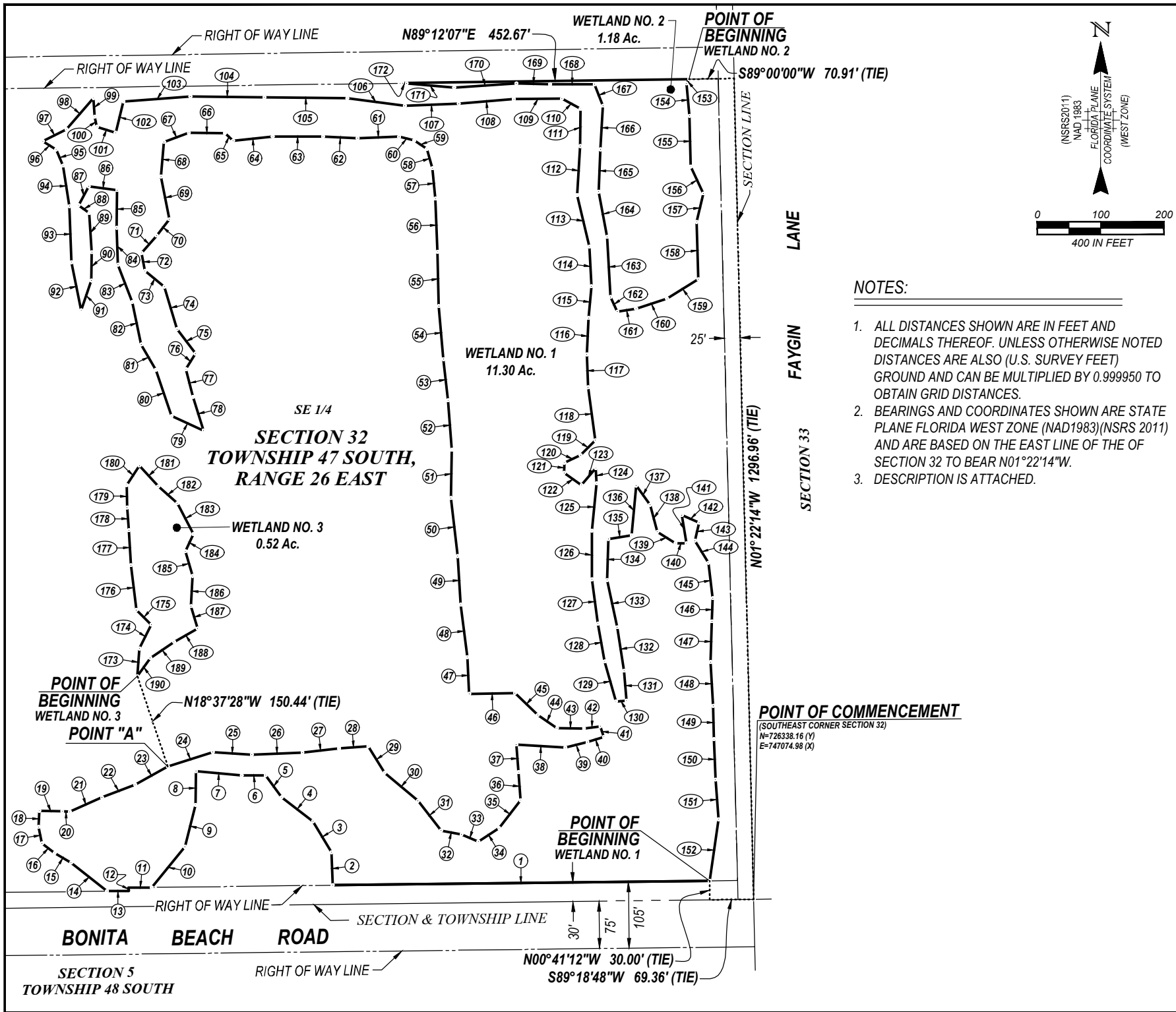
From said Point of Beginning run the following courses and distances: N04°14'25"E for 43.83 feet; N26°27'01"E for 42.24 feet; N45°21'18"W for 33.18 feet; N07°07'49"W for 71.16 feet; N03°07'04"W for 55.37 feet; N04°32'26"W for 35.72 feet; N01°26'02"W for 35.51 feet; N33°13'48"E for 36.76 feet; S42°27'21"E for 44.17 feet; S48°33'31"E for 40.23 feet; S27°39'13"E for 55.04 feet; S25°28'47"W for 30.05 feet; S16°28'23"E for 40.74 feet; S03°08'36"W for 47.71 feet; S16°32'00"E for 36.87 feet; S60°05'12"W for 42.69 feet; S56°19'55"W for 45.42 feet; S34°56'50"W for 35.36 feet to the POINT OF BEGINNING.

Containing 0.52 acres, more or less.

Containing a net area of 34.02 acres, more or less.

Bearings hereinabove mentioned are State Plane for the Florida West Zone (NAD1983)(NSRS2011) and are based on the South line of the Southeast Quarter (SE 1/4) of said Section 32 to bear N89°18'48"E.

Scott A. Wheeler (For The Firm)
Professional Surveyor and Mapper
Florida Certificate No. 5949



- NOTES:**
1. ALL DISTANCES SHOWN ARE IN FEET AND DECIMALS THEREOF. UNLESS OTHERWISE NOTED DISTANCES ARE ALSO (U.S. SURVEY FEET) GROUND AND CAN BE MULTIPLIED BY 0.999950 TO OBTAIN GRID DISTANCES.
 2. BEARINGS AND COORDINATES SHOWN ARE STATE PLANE FLORIDA WEST ZONE (NAD1983)(NSRS 2011) AND ARE BASED ON THE EAST LINE OF THE OF SECTION 32 TO BEAR $N01^{\circ}22'14\"W$.
 3. DESCRIPTION IS ATTACHED.

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A PARCEL OF LAND IN SECTION 32, TOWNSHIP 47 SOUTH, RANGE 26 EAST, LEE COUNTY, FLORIDA

PROJECT SURVEYOR

NOT VALID WITHOUT THE SIGNATURE AND THE ORIGINAL RAISED OR DIGITAL SEAL OF A FLORIDA LICENSED SURVEYOR AND MAPPER.

FILE NAME	24350SK03B.DWG
LAYOUT	1
LOCATION	J:\24350DWG\SURVEYING\SKETCH
PLOT DATE	FRI: 4-3-2026 - 12:29 PM
PLOT BY	CALEBREIBER
DRAWING DATA	
SURVEY DATE	04-03-2026
DRAWN BY	CLR
CHECKED BY	SAW
SCALE	1"=200'
FIELD BOOK	

PLAN REVISIONS	
STRAP NUMBERS	

SKETCH TO ACCOMPANY DESCRIPTION

COURSE INFORMATION

1	S89°18'48"W	595.32'	39	N76°12'05"E	35.76'	77	S13°46'13"E	45.09'	115	S05°06'20"W	50.18'	153	S31°17'43"W	7.94'
2	N01°55'45"W	52.07'	40	N72°18'36"E	27.47'	78	S17°46'07"E	55.55'	116	S02°39'44"W	57.82'	154	S05°23'15"E	51.31'
3	N30°37'28"W	57.05'	41	N18°28'44"W	17.86'	79	N65°49'52"W	55.41'	117	S02°07'42"E	51.95'	155	S01°07'05"E	80.41'
4	N52°36'49"W	62.65'	42	S82°06'49"W	26.24'	80	N18°51'27"W	77.25'	118	S07°57'37"E	84.34'	156	S25°29'05"E	47.00'
5	N35°55'13"W	42.80'	43	N88°47'36"W	42.52'	81	N29°42'04"W	46.11'	119	S44°51'10"W	33.43'	157	S13°30'49"W	46.13'
6	S89°38'48"W	37.79'	44	N55°52'46"W	36.60'	82	N12°00'20"W	68.54'	120	S65°03'02"W	28.11'	158	S01°49'28"E	90.39'
7	N84°44'42"W	72.76'	45	N46°05'31"W	50.07'	83	N20°50'09"W	63.00'	121	S01°43'45"W	16.33'	159	S58°05'57"W	58.49'
8	S00°33'44"W	53.26'	46	S89°00'13"W	72.11'	84	N02°00'10"W	58.38'	122	S55°12'42"E	33.75'	160	S72°16'33"W	51.24'
9	S14°18'03"W	68.50'	47	N03°09'11"W	57.95'	85	N00°26'17"E	59.61'	123	N39°36'06"E	35.18'	161	S80°50'10"W	29.76'
10	S39°09'51"W	82.61'	48	N06°59'55"W	83.52'	86	N82°45'51"W	45.05'	124	S03°41'07"E	24.10'	162	N25°33'44"W	25.62'
11	S89°18'48"W	36.54'	49	N03°35'48"W	76.86'	87	S28°43'10"W	33.72'	125	S06°02'26"W	75.13'	163	N03°08'13"W	95.19'
12	S01°14'01"E	5.00'	50	N06°45'11"W	92.38'	88	S53°59'51"E	20.91'	126	S00°08'10"E	76.98'	164	N10°39'09"W	72.54'
13	S89°18'48"W	34.33'	51	N01°10'51"E	76.30'	89	S03°45'04"E	62.19'	127	S07°52'19"E	70.66'	165	N02°32'00"E	66.81'
14	N51°28'51"W	72.25'	52	N04°32'31"W	78.33'	90	S00°35'59"W	44.72'	128	S10°07'54"E	60.61'	166	N03°10'50"E	69.10'
15	N59°33'39"W	30.03'	53	N06°12'18"W	65.40'	91	S19°07'45"W	49.69'	129	S15°36'28"E	65.61'	167	N21°22'04"W	36.27'
16	N53°08'39"W	25.13'	54	N05°00'04"W	84.25'	92	N11°21'27"W	77.44'	130	N85°50'17"E	16.83'	168	N89°58'27"W	70.37'
17	N11°32'32"W	26.74'	55	N01°22'08"W	85.68'	93	N02°02'23"W	88.60'	131	N05°02'44"W	47.30'	169	N88°25'43"W	53.08'
18	N02°45'32"E	25.45'	56	N02°11'58"W	84.09'	94	N08°57'14"W	64.89'	132	N08°46'36"W	69.64'	170	S86°12'59"W	98.60'
19	S88°32'20"E	35.92'	57	N05°39'02"W	48.12'	95	N23°37'04"W	27.80'	133	N11°55'40"W	76.12'	171	N85°03'01"W	75.33'
20	S87°24'08"E	12.19'	58	N16°30'44"W	31.78'	96	N57°52'32"W	24.57'	134	N01°27'09"E	64.97'	172	N86°37'23"W	6.43'
21	N66°05'06"E	55.39'	59	N55°59'20"W	24.00'	97	N63°09'51"E	41.67'	135	N81°05'20"E	37.31'	173	N04°14'25"E	43.83'
22	N68°56'03"E	56.18'	60	N75°46'44"W	24.45'	98	N41°00'32"E	65.36'	136	N05°16'34"E	78.85'	174	N26°27'01"E	42.24'
23	N60°49'18"E	59.12'	61	S87°58'47"W	65.75'	99	S03°45'58"E	29.36'	137	S35°53'58"E	37.38'	175	N45°21'18"W	33.18'
24	N72°06'50"E	74.62'	62	N87°19'34"W	54.45'	100	S12°05'10"E	16.22'	138	S15°06'51"E	44.30'	176	N07°07'49"W	71.16'
25	S86°03'20"E	61.84'	63	N89°56'31"W	79.71'	101	S72°03'16"E	30.88'	139	S57°55'56"E	33.78'	177	N03°07'04"W	55.37'
26	N87°28'21"E	79.87'	64	S83°57'42"W	63.03'	102	N14°23'33"E	50.77'	140	S89°00'41"E	17.34'	178	N04°32'26"W	35.72'
27	N83°35'38"E	58.22'	65	N46°38'14"W	17.46'	103	N85°34'48"E	105.80'	141	N09°09'33"W	45.27'	179	N01°26'02"W	35.51'
28	N85°59'55"E	46.29'	66	N89°43'29"W	57.05'	104	S89°13'37"E	116.98'	142	S66°29'14"E	29.69'	180	N33°13'48"E	36.76'
29	S31°53'43"E	49.09'	67	S70°09'49"W	41.60'	105	S89°24'24"E	130.81'	143	S13°16'07"W	29.27'	181	S42°27'21"E	44.17'
30	S49°40'15"E	68.85'	68	S04°49'27"W	54.82'	106	S82°23'20"E	91.53'	144	S31°00'38"E	40.92'	182	S48°33'31"E	40.23'
31	S37°59'05"E	59.30'	69	S11°00'20"E	68.92'	107	N87°27'12"E	85.37'	145	S07°23'52"E	56.28'	183	S27°39'13"E	55.04'
32	S79°10'20"E	32.89'	70	S38°10'25"W	32.75'	108	N85°26'54"E	87.17'	146	S02°46'02"W	36.68'	184	S25°28'47"W	30.05'
33	S67°04'19"E	28.78'	71	S40°26'23"W	36.37'	109	N89°28'25"E	75.94'	147	S01°32'50"W	64.28'	185	S16°28'23"E	40.74'
34	N57°26'00"E	39.08'	72	S10°33'36"E	28.68'	110	S61°40'58"E	33.45'	148	S03°19'58"E	69.42'	186	S03°08'36"W	47.71'
35	N37°46'16"E	55.52'	73	S51°10'23"E	39.45'	111	S00°19'13"W	58.97'	149	S01°07'56"E	52.54'	187	S16°32'00"E	36.87'
36	N04°21'34"W	44.73'	74	S16°25'20"E	70.05'	112	S03°44'30"W	77.61'	150	S02°14'32"E	64.04'	188	S60°05'12"W	42.69'
37	N04°16'48"W	43.68'	75	S36°55'45"E	48.32'	113	S13°33'07"E	83.62'	151	S04°21'53"E	62.87'	189	S56°19'55"W	45.42'
38	S86°23'38"E	77.38'	76	S30°46'09"W	28.76'	114	S02°37'53"E	62.75'	152	S08°15'05"W	98.01'	190	S34°56'50"W	35.36'

Barraco

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FAX (239) 498-7707

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PROJECT DESCRIPTION

**A PARCEL OF LAND IN
SECTION 32,
TOWNSHIP 47 SOUTH,
RANGE 26 EAST,
LEE COUNTY, FLORIDA**

PROJECT SURVEYOR



NOT VALID WITHOUT THE SIGNATURE AND THE ORIGINAL RAISED OR DIGITAL SEAL OF A FLORIDA LICENSED SURVEYOR AND MAPPER

FILE NAME	243500308.DWG
LAYOUT	3
LOCATION	J:\243500308\DWG\SURVEYING\SKETCH
PLOT DATE	FRI, 4-3-2026 - 12:30 PM
PLOT BY	CALEBREIBER

DRAWING DATA	
SURVEY DATE	04-03-2026
DRAWN BY	CLR
CHECKED BY	SAW
SCALE	
FIELD BOOK	

PLAN REVISIONS

STRAP NUMBERS

**SKETCH TO
ACCOMPANY
DESCRIPTION**

DESCRIPTION

Parcel in
Section 32, Township 47 South, Range 26 East
Lee County, Florida

A tract or parcel of land lying in Section 32, Township 47 South, Range 26 East, Lee County, Florida, said tract or parcel of land being more particularly described as follows:

WETLAND NO. 1

COMMENCING at the Southeast corner of said Section 32 run S89°18'48"W along the South line of said Section 32 for 69.36 feet; thence run N00°41'12"W for 30.00 feet to the POINT OF BEGINNING;

From said Point of Beginning run the following courses and distances: S89°18'48"W for 595.32 feet; N01°55'45"W for 52.07 feet; N30°37'28"W for 57.05 feet; N52°36'49"W for 62.65 feet; N35°55'13"W for 42.80 feet; S89°38'48"W for 37.79 feet; N84°44'42"W for 72.76 feet; S00°33'44"W for 53.26 feet; S14°18'03"W for 68.50 feet; S39°09'51"W for 82.61 feet; S89°18'48"W for 36.54 feet; S01°14'01"E for 5.00 feet; S89°18'48"W for 34.33 feet; N51°28'51"W for 72.25 feet; N59°33'39"W for 30.03 feet; N53°08'39"W for 25.13 feet; N11°32'32"W for 26.74 feet; N02°45'32"E for 25.45 feet; S88°32'20"E for 35.92 feet; S87°24'08"E for 12.19 feet; N66°05'06"E for 55.39 feet; N68°56'03"E for 56.18 feet; N60°49'18"E for 59.12 feet to a point designated as Point "A"; N72°06'50"E for 74.62 feet; S86°03'20"E for 61.84 feet; N87°28'21"E for 79.87 feet; N83°35'38"E for 58.22 feet; N85°59'55"E for 46.29 feet; S31°53'43"E for 49.09 feet; S49°40'15"E for 68.85 feet; S37°59'05"E for 59.30 feet; S79°10'20"E for 32.89 feet; S67°04'19"E for 28.78 feet; N57°26'00"E for 39.08 feet; N37°46'16"E for 55.52 feet; N04°21'34"W for 44.73 feet; N04°16'48"W for 43.68 feet; S86°23'38"E for 77.38 feet; N76°12'05"E for 35.76 feet; N72°18'36"E for 27.47 feet; N18°28'44"W for 17.86 feet; S82°06'49"W for 26.24 feet; N88°47'36"W for 42.52 feet; N55°52'46"W for 36.60 feet; N46°05'31"W for 50.07 feet; S89°00'13"W for 72.11 feet; N03°09'11"W for 57.95 feet; N06°59'55"W for 83.52 feet; N03°35'48"W for 76.86 feet; N06°45'11"W for 92.38 feet; N01°10'51"E for 76.30 feet; N04°32'31"W for 78.33 feet; N06°12'18"W for 65.40 feet; N05°00'04"W for 84.25 feet; N01°22'08"W for 85.68 feet; N02°11'58"W for 84.09 feet; N05°39'02"W for 48.12 feet; N16°30'44"W for 31.78 feet; N55°59'20"W for 24.00 feet; N75°46'44"W for 24.45 feet; S87°58'47"W for 65.75 feet; N87°19'34"W for 54.45 feet; N89°56'31"W for 79.71 feet; S83°57'42"W for 63.03 feet; N46°38'14"W for 17.46 feet; N89°43'29"W for 57.05 feet; S70°09'49"W for 41.60 feet; S04°49'27"W for 54.82 feet; S11°00'20"E for 68.92 feet; S38°10'25"W for 32.75 feet; S40°26'23"W for 36.37 feet; S10°33'36"E for 28.68 feet; S51°10'23"E for 39.45 feet; S16°25'20"E for 70.05 feet; S36°55'45"E for 48.32 feet; S30°46'09"W for 28.76 feet; S13°46'13"E for 45.09 feet; S17°46'07"E for 55.55 feet; N65°49'52"W for 55.41 feet; N18°51'27"W for 77.25 feet; N29°42'04"W for 46.11 feet; N12°00'20"W for 68.54 feet; N20°50'09"W for

DESCRIPTION (CONTINUED)

63.00 feet; N02°00'10"W for 58.38 feet; N00°26'17"E for 59.61 feet; N82°45'51"W for 45.05 feet; S28°43'10"W for 33.72 feet; S53°59'51"E for 20.91 feet; S03°45'04"E for 62.19 feet; S00°35'59"W for 44.72 feet; S19°07'45"W for 49.69 feet; N11°21'27"W for 77.44 feet; N02°02'23"W for 88.60 feet; N08°57'14"W for 64.89 feet; N23°37'04"W for 27.80 feet; N57°52'32"W for 24.57 feet; N63°09'51"E for 41.67 feet; N41°00'32"E for 65.36 feet; S03°45'58"E for 29.36 feet; S12°05'10"E for 16.22 feet; S72°03'16"E for 30.88 feet; N14°23'33"E for 50.77 feet; N85°34'48"E for 105.80 feet; S89°13'37"E for 116.98 feet; S89°24'24"E for 130.81 feet; S82°23'20"E for 91.53 feet; N87°27'12"E for 85.37 feet; N85°26'54"E for 87.17 feet; N89°28'25"E for 75.94 feet; S61°40'58"E for 33.45 feet; S00°19'13"W for 58.97 feet; S03°44'30"W for 77.61 feet; S13°33'07"E for 83.62 feet; S02°37'53"E for 62.75 feet; S05°06'20"W for 50.18 feet; S02°39'44"W for 57.82 feet; S02°07'42"E for 51.95 feet; S07°57'37"E for 84.34 feet; S44°51'10"W for 33.43 feet; S65°03'02"W for 28.11 feet; S01°43'45"W for 16.33 feet; S55°12'42"E for 33.75 feet; N39°36'06"E for 35.18 feet; S03°41'07"E for 24.10 feet; S06°02'26"W for 75.13 feet; S00°08'10"E for 76.98 feet; S07°52'19"E for 70.66 feet; S10°07'54"E for 60.61 feet; S15°36'28"E for 65.61 feet; N85°50'17"E for 16.83 feet; N05°02'44"W for 47.30 feet; N08°46'36"W for 69.64 feet; N11°55'40"W for 76.12 feet; N01°27'09"E for 64.97 feet; N81°05'20"E for 37.31 feet; N05°16'34"E for 78.85 feet; S35°53'58"E for 37.38 feet; S15°06'51"E for 44.30 feet; S57°55'56"E for 33.78 feet; S89°00'41"E for 17.34 feet; N09°09'33"W for 45.27 feet; S66°29'14"E for 29.69 feet; S13°16'07"W for 29.27 feet; S31°00'38"E for 40.92 feet; S07°23'52"E for 56.28 feet; S02°46'02"W for 36.68 feet; S01°32'50"W for 64.28 feet; S03°19'58"E for 69.42 feet; S01°07'56"E for 52.54 feet; S02°14'32"E for 64.04 feet; S04°21'53"E for 62.87 feet and S08°15'05"W for 98.01 feet to the POINT OF BEGINNING.

Containing 11.30 acres, more or less.

WETLAND NO. 2

COMMENCING at the Southeast corner of said Section 32 run N01°22'14"W along the East line of said Section 32 for 1296.96 feet; thence run S89°00'00"W for 70.91 feet to the POINT OF BEGINNING;

From said Point of Beginning run the following courses and distances: S31°17'43"W for 7.94 feet; S05°23'15"E for 51.31 feet; S01°07'05"E for 80.41 feet; S25°29'05"E for 47.00 feet; S13°30'49"W for 46.13 feet; S01°49'28"E for 90.39 feet; S58°05'57"W for 58.49 feet; S72°16'33"W for 51.24 feet; S80°50'10"W for 29.76 feet; N25°33'44"W for 25.62 feet; N03°08'13"W for 95.19 feet; N10°39'09"W for 72.54 feet; N02°32'00"E for 66.81 feet; N03°10'50"E for 69.10 feet; N21°22'04"W for 36.27 feet; N89°58'27"W for 70.37 feet; N88°25'43"W for 53.08 feet; S86°12'59"W for 98.60 feet; N85°03'01"W for 75.33 feet; N86°37'23"W for 6.43 feet and N89°12'07"E for 452.67 feet to the POINT OF BEGINNING.

Containing 1.18 acres, more or less.

WETLAND NO. 3

DESCRIPTION (CONTINUED)

COMMENCING at said Point "A" run N18°37'28"W for 150.44 feet to the POINT OF BEGINNING;

From said Point of Beginning run the following courses and distances: N04°14'25"E for 43.83 feet; N26°27'01"E for 42.24 feet; N45°21'18"W for 33.18 feet; N07°07'49"W for 71.16 feet; N03°07'04"W for 55.37 feet; N04°32'26"W for 35.72 feet; N01°26'02"W for 35.51 feet; N33°13'48"E for 36.76 feet; S42°27'21"E for 44.17 feet; S48°33'31"E for 40.23 feet; S27°39'13"E for 55.04 feet; S25°28'47"W for 30.05 feet; S16°28'23"E for 40.74 feet; S03°08'36"W for 47.71 feet; S16°32'00"E for 36.87 feet; S60°05'12"W for 42.69 feet; S56°19'55"W for 45.42 feet and S34°56'50"W for 35.36 feet to the POINT OF BEGINNING.

Containing 0.52 acres, more or less.

Net Area of Wetland No. 1, Wetland No. 2, and Wetland No. 3 is 13.00 acres, more or less.

Bearings hereinabove mentioned are State Plane for the Florida West Zone (NAD1983)(NSRS 2011) and are based on the East line of Section 32 to bear N01°22'14"W.

Scott A. Wheeler (For The Firm)
Professional Surveyor and Mapper
Florida Certificate No. 5949

LEE PLAN ANALYSIS

Exhibit M12

The proposed Map Amendment will allow for a residential neighborhood along the north side of Bonita Beach Road. An analysis of how the proposed amendment is consistent with the following Lee Plan policies is described below:

POLICY 1.1.6: *The Outlying Suburban future land use category is characterized by its peripheral location in relation to established urban areas. In general, this category is rural in nature or contains existing low-density development. Some of the requisite infrastructure needed for higher density development is planned or in place. Industrial land uses are not permitted. The standard density range is from one dwelling unit per acre (1 du/acre) to three dwelling units per acre (3 du/acre). Bonus densities are not allowed.*

The subject property is proposed to be designated as Outlying Suburban on the future land use map. This is the land use category that was designated for the properties south of Bonita Beach Road in the 1990 Lee Plan and but for the need in 1990 to reduce density on the future land use map, would have been the designation for this property. Although this property is distinctly no longer rural and has urban development directly adjacent on the south and west, densities in the area are generally consistent with the Outlying Suburban land use category and all infrastructure is in place to serve development. The proposed planned development is requesting 94 residential units. The Outlying Suburban future land use category would allow up to 102 units on the 34 upland acres of the property. The proposed Comprehensive plan amendment and rezoning request meet the purpose and intent of the outlying Suburban future land use category.

POLICY 1.4.5: *The Density Reduction/Groundwater Resource (DR/GR) 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 (except as provided in Policies 33.1.3 and 33.3.5) 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 may be submitted during the rezoning or development review processes.

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 density of one dwelling unit per ten acres (1 du/10 acres), and commercial uses in accordance with Policy 33.3.5. See Policies 33.3.2, 33.3.3, 33.3.4, 33.3.5 and 33.3.6 for potential density adjustments resulting from concentration or transfer of development rights.

The subject property no longer meets the characteristics of the Density Reduction Groundwater Resource land use category. A hydrologic analysis has been conducted and is being submitted with this application demonstrating “*compatibility with maintaining surface and groundwater levels at their historic levels*”. In addition, modeling was conducted which shows “*that no adverse impacts will result to properties located upstream, downstream, as well as adjacent to the site.*”

There is very little about the location of the subject property that is rural. The property is along and has direct access to a four lane divided arterial road, has utility lines in place to serve the property, is proximate to fire, EMS, schools, a YMCA and commercial services. Bonita Beach Road now connects to Logan Boulevard east of the subject property which provides an arterial connection to Collier County.

OBJECTIVE 1.5: WETLANDS. *Designate on the Future Land Use Map those lands that are identified as Wetlands in accordance with F.S. 373.019(27) through the use of the unified state delineation methodology described in FAC Chapter 27-340, as ratified and amended in F.S. 373.4211.*

POLICY 1.5.1: *Permitted land uses in Wetlands consist of very low density residential uses and recreational uses that will not adversely affect the ecological functions of wetlands. All development in Wetlands must be consistent with Goal 124 of this plan. The maximum density is one dwelling unit per twenty acres (1 du/20 acre) except as otherwise provided in Table 1(a) and Chapter XIII of this plan.*

The subject property has areas that have been designated as wetlands in accordance with F.S. 373.019(27) through the use of the unified state delineation methodology. The wetland areas are highly impacted and do not meet the definition of indigenous vegetation. According to the Passarella ecological assessment, these wetland areas provide very limited functional value. Mitigation for these areas will provide a net positive benefit for the ecology and hydrology regionally. Density on these properties will remain at 1 du/20 acres.

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 amendment is in a location where large-scale residential development is occurring or in place directly to the south and west, and in close proximity to the east. The proposed plan amendment would allow for the development of an appropriate use for the subject property in an appropriate location.

POLICY 2.1.1: *Most residential, commercial, industrial, and public development is expected to occur within the designated Future Urban Areas on the Future Land Use Map through the assignment of very low densities to the non-urban categories.*

There is very little about the location of the subject property that is rural. The property is along and has direct access to a four lane divided arterial road, has utility lines in place to serve the property, is proximately to fire, EMS, schools, a YMCA and commercial services. Since the property's designation as DR/GR in 1990 this area has changed dramatically and is now distinctly urban in character. The changed reality of this area should be reflected on the future land use map.

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 §163.3164, Fla. Stat.) will be granted only when consistent with the provisions of §163.3202(2)(g) and § 163.3180, Fla. Stat. and the concurrency requirements in the LDC.*

As noted above and as is apparent on the location map that are part of this application, the subject property is located in an area with existing or approved urban development to the south, west and east. Public facilities exist to the subject property already. Despite the current future land use category, the subject property is located in an area that is characteristic of an urban area. The property is along and has direct access to a four lane divided arterial road, has utility lines in place to serve the property, is proximate to fire, EMS, schools, a YMCA and commercial services. The Outlying Suburban future land use category is the most appropriate land use category for the subject property and development of the subject property is consistent with Objective 2.2.

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.*

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,*
 - 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,*
 - 3. present data and analysis that the proposed land uses will not cause any significant harm to present and future public water resources; and,*
 - 4. supply data and analysis specifically addressing urban sprawl.*
- During the transmittal and adoption process, the Board of County Commissioners must review the application for all these analytical requirements and make a finding that the amendment complies with all of them.*

Attached to this application is a *Characterization of Groundwater and Surface water resources* report conducted by RESPEC, which provides an in depth analysis in response to Policies 2.3.1 and 2.3.2. Specifically, the report states:

“Regional SFWMD groundwater modeling indicated that projected withdrawals, including existing recreational and aesthetic withdrawals within and near the DR/GR result in only minor drawdowns (0.5 to 3 feet) and do not threaten long-term potable water availability. Because the irrigation demand associated with the proposed development is considered minimal, the project's groundwater use will not impair existing or future potable water resources and is therefore consistent with Policy 2.3.1.

*The Lower Tamiami Aquifer is a planned and sustainable irrigation source within the regional water-supply framework. SFWMD modeling demonstrates that cumulative future withdrawals remain within sustainable aquifer yield limits, including within recharge areas associated with the DR/GR. The hydrogeologic properties of the Lower Tamiami Aquifer, high transmissivity, substantial thickness, and protection by an overlying confining unit further support its ability to accommodate low-intensity landscape irrigation without compromising recharge or inducing undesirable water-level changes. Groundwater flow modeling (see **Section 5** below) of the proposed residential irrigation demands, and the detailed integrated modeling analysis clearly demonstrate no adverse impacts to the DR/GR and the overall water resources will occur. In fact, recharge potential increases because of the proposed development.” (Page 7 of 15)*

The groundwater resource component of the DRGR has been addressed by the requirements set forth in Section 163.3177(6)(c)4, F.S. as implemented through Policy 55.1.3. The subject property is not shown as being needed to implement the County's water supply needs in the Water Supply Facilities Work Plan or the SFWMD Lower West Coast Water Supply Plan.

STANDARD 4.1.1: WATER.

- 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).*
- 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 proposed development is located within the Bonita Springs Utility Service Area. A letter of service availability has been provided. The applicant is coordinating with BSU and is responsible for the extension of water lines into the property.

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.*
- 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 1/4 mile from any part of the development.*

The proposed development is located within the Bonita Springs Utility Service Area. A letter of service availability has been provided. The applicant is coordinating with BSU and is responsible for the extension of sewer lines into the property.

GOAL 5: RESIDENTIAL LAND USES. *To accommodate the projected population of Lee County in the year 2045 in appropriate locations, guided by the Future Land Use Map, and in attractive and safe neighborhoods with a variety of price ranges and housing types.*

The primary reason why the subject property was designated DR/GR in the 1990 settlement with the then DCA was premature designation of excessing population through the year 2010 on the future land use map. As Goal 5 demonstrates the intent of the Lee Plan is to now look out to 2045, 35 years ahead of the horizon year in the 2010 plan. This area have experienced a dramatic transformation in that time.

POLICY 5.1.1: Residential developments requiring rezoning and meeting Development of County Impact (DCI) thresholds must be developed as Planned Developments except if located within the Mixed Use Overlay.

A planned development application is being filed concurrent with the proposed Lee Plan amendment.

POLICY 5.1.2: Prohibit residential development where physical constraints or hazards exist, or require the density and design to be adjusted accordingly. Such constraints or hazards include but are not limited to flood, storm, or hurricane hazards; unstable soil or geologic conditions; environmental limitations; aircraft noise; or other characteristics that may endanger the residential community.

The subject property is not within the Coastal High Hazard area and not in an area where physical constraints exist. Any development of the property will need to meet FEMA design standards and be permitted through the SFWMD to ensure that the property does not flood or cause off site flooding.

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.

The subject property is within the Southeast Lee County Planning community but is not part of a regional flowway or a natural habitat corridor. The property has urban development on the south and west and is along a major 4 land divided arterial roadway. Additional development exists to the east and north. The proposed development is around two former fill mining lakes and has no on site conservation value of any significance. While the subject property is within Southeast Lee County it is not characteristic of the majority of the area as described by Goal 33.

OBJECTIVE 33.1: WATER, HABITAT, AND OTHER NATURAL RESOURCES. Protect and restore natural resources within Southeast Lee County including, but not limited to, surface and ground water, wetlands, and wildlife habitat.

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.

As noted above, the subject property does not have on site natural resources to protect. As noted in the Characterization of Ground and Surface Water Resources “*The White Willow project presents a unique opportunity to restore and enhance a highly disturbed and hydrologically impacted property... the proposed development demonstrates a high level of protection, preservation, and enhancement of groundwater, surface water, and environmental resources.*”

POLICY 33.1.2: *The DR/GR Priority Restoration Strategy consists of seven tiers of land where protection and/or restoration would be most critical to restore historic surface and groundwater levels and to connect existing corridors or conservation areas (see Map 1-D). Within these tiers, density incentives will be utilized as a mechanism to improve, preserve, and restore regional surface and groundwater resources and wildlife habitat of state and federally listed species; with Tier 1 and Tier 2 being the most incentivized tiers. Lee County may consider amendments to this Overlay based on changes in public ownership, land use, new scientific data, and/or demands on natural resources. This Overlay does not restrict the use of the land.*

Map 1-D is not applicable for the subject property or any of the Southeast Lee County area along Bonita Beach Road. This area of Southeast Lee was not part of the Dover Khol study that produced Map 1-D.

POLICY 33.1.3: *Pursue acquisition (partial or full interest) of land within the Tier 1 areas in the Priority Restoration Strategy Overlay through direct purchase; partnerships with other government agencies; long-term purchase agreements; right of first refusal contracts; land swaps; or other appropriate means to provide critical connections to conservation lands that serve as the backbone for water resource management and wildlife movement within Southeast Lee County. Tier 2 lands are of equal ecological and water resource importance as Tier 1 but have better potential to remain in productive agricultural use. Tier 3 lands and the southern two miles of Tiers 5, 6, and 7 can provide an important wildlife connection to conservation lands in Collier County and an anticipated regional habitat link to the Okaloacoochee Slough State Forest. Tiers 1, 2, 3, and the southern two miles of Tiers 5, 6, and 7 may qualify for unique development incentives outlined in Objectives 33.2 and 33.3 due to the property's potential for natural resource benefits and/or wildlife connections. Additionally, the County may consider incentives, within all tiers, for private landowners to improve water resources and natural ecosystems.*

Map 1-D is not applicable for the subject property or any of the Southeast Lee County area along Bonita Beach Road. This area of Southeast Lee was not part of the Dover Khol study that produced Map 1-D.

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.

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

The proposed development is on a site with historic mining lakes. There are no agricultural ditches to fill. However, in a post development state, under current local and state guidelines, hydrologic restoration and improvements to water quality will occur, as outlined in the Characterization of Ground and Surface Water Resources report.

POLICY 33.1.5: *Lee County recognizes the importance of maintaining agricultural lands within Southeast Lee County for local food production, water conservation and storage, land conservation, wildlife habitat, and wetland restoration. The continued use of ever evolving agricultural best management practices will protect native soils and potentially improve the quantity and quality of water resources, allowing sustainable agriculture to be integrated into restoration planning for Southeast Lee County.*

POLICY 33.1.6: *On existing farmland, the County will offer incentives to encourage the continuation of agricultural operations. Incentives will include the ability to concentrate all existing development rights while farming continues on the remainder of the tract; and, the ability to sever and sell all development rights while farming continues on the entire tract. Other incentives may be provided to agricultural operations that implement and maintain best management practices. Continued agricultural use may be a desirable long-term use even within land designated on the Priority Restoration Strategy Overlay as potentially eligible for protection (see Policy 9.1.7).*

The subject property is not existing farmland or in agricultural use.

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.*

The application includes an integrated surface and groundwater model which demonstrates that there will not be adverse impacts on water resources and natural systems within Southeast Lee County.

POLICY 33.1.8: *The County supports a comprehensive and coordinated effort to manage water resources in a manner that includes the protection and restoration of natural systems within Southeast Lee County.*

As noted above, the subject property does not have on site natural resources to protect. As noted in the Characterization of Ground and Surface Water Resources “*The White Willow project presents a unique opportunity to restore and enhance a highly disturbed and hydrologically impacted property... the proposed development demonstrates a high level of protection, preservation, and enhancement of groundwater, surface water, and environmental resources.*”

OBJECTIVE 33.2: RESIDENTIAL AND MIXED-USE DEVELOPMENT. *Designate on a Future Land Use Map overlay areas that should be protected from adverse impacts of mining (Existing Acreage Subdivisions), specific locations for concentrating existing development rights on large tracts (Mixed-Use Communities), specific properties which provide opportunities to protect, preserve, and restore strategic regional hydrological and wildlife connections (Environmental Enhancement and Preservation Communities), and vacant properties with existing residential approvals that are inconsistent with the DR/GR future land use category (Improved Residential Communities).*

The subject property and all of Bonita Beach Road is far removed from all of the above mixed use a residential areas as defined on Lee Plan Map 2-D. Objective 33.2 is not applicable to the proposed amendment.

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

The project complies with Policy 60.1.1 by establishing the site control elevation using surrounding ERP-permitted surface water management systems and verified field data. Wet-season groundwater levels were confirmed by the project ecologist through site-specific field observations.

A modern stormwater management system has been designed to maintain control elevations consistent with documented wet-season water tables, ensuring protection of groundwater resources. The system also incorporates state-required nutrient reduction measures that improve water quality prior to discharging to the Imperial River watershed, in full compliance with current SFWMD and FDEP stormwater design criteria.

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

As shown on the attached flowway map, there are no historic flowways that cross the subject property.

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.*

OBJECTIVE 61.2: MIMICKING THE FUNCTIONS OF NATURAL SYSTEM. Support a surface water management strategy that relies on natural features (flow ways, sloughs, strands, etc.) and natural systems to receive and otherwise manage storm and surface water.

As stated in the ground and surface water analysis conducted by RESPEC: *“The site design incorporates open space areas and pervious surfaces consistent with the LDC to maintain groundwater recharge functions while preventing land uses or activities that could degrade groundwater quality within the wellfield protection area. These measures further support Lee Plan Goal 61 (Water Resources) and Objective 61.2 by maintaining pre-development hydrologic conditions to the maximum extent practicable and protecting groundwater recharge and water quality.”*

POLICY 63.1.2: The staff hydrogeologist will review and comment on all development applications near public utility potable water wellfields, with particular attention to proposed land uses within a 10-year travel time from the wellheads.

As stated in the ground and surface water analysis conducted by RESPEC: *“Stormwater management systems are designed to meet or exceed Lee County LDC and SFWMD water quality and treatment standards. Stormwater runoff will receive appropriate treatment prior to discharge or infiltration to minimize pollutant migration within the wellfield travel time zones, consistent with Lee Plan Policy 63.1.2 and corresponding LDC performance standards. Untreated stormwater infiltration within sensitive portions of the wellfield protection area is avoided, and pretreatment is provided where infiltration practices are utilized.”*

POLICY 123.2.10: *Require that development adjacent to aquatic and other nature preserves, wildlife refuges, and recreation areas be designed to protect the natural character and public investment in these areas.*

There is only a very small portion of the northern property line that is adjacent to state preserve area (+/-20% of the northern border). The majority of the property is adjacent to developed land. The Southern CREW Restoration project is not on the adjacent parcel but is located to the north and east of the subject property.

The engineered stormwater management system is designed to maintain existing flow patterns, preserve hydrologic separation from the preserve, and prevent adverse impacts to natural

systems. These measures ensure protection of the natural character and ongoing public investment in conservation lands.

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

The proposed development will not degrade water quality. The newly enacted stormwater rules by the State have a net improvement standard that they were designed for. Any proposed development will need to be issued an environmental resource permit from the South Florida Water Management District, which includes a detailed water quality analysis that demonstrates compliance with the State's water quality standards. The SFWMD will need to certify that the project meets State and Federal water quality standards.

***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.*

There are no natural wetland systems or natural hydrologic features on the subject property. The existing lakes were created through historical mining activity and were intentionally constructed without an open discharge point. The project improves the current condition by converting these mining pits into an integrated stormwater management system. Enhancements include sculpting lake littoral shelves, establishing littoral vegetation, and incorporating modern water quality treatment features to meet the new State Stormwater Rule. These improvements increase retention, purification, and hydrologic functionality compared to existing conditions.

***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.*

The stormwater management system has been designed in full compliance with SFWMD ERP criteria and local regulations to maintain or improve existing surface water flows, groundwater conditions, and lake water levels. The project maintains pre-development hydrologic patterns while introducing enhanced treatment and retention features that improve water resource performance relative to current site conditions.

Conclusion

The proposed Lee Plan amendment and Planned Development application are consistent with the Lee Plan as a whole. The current future land use category is no longer applicable or consistent with the subject property or the surrounding uses to the west, east and south of the subject property. Analyses have been conducted to adequately demonstrate that approval of this project will not have a negative impact on future water resources of the county and may have an overall net improvement.

Kevin Ruane
District One

March 30, 2026

Cecil L. Pendergrass
District Two

David Mulicka
District Three

Daniel DeLisi, AICP
DeLisi, Inc.

Brian Hamman
District Four

Mike Greenwell
District Five

**White Willow CPA
Letter of Service Availability Request**

Dave Harner, II
County Manager

Richard Wesch
County Attorney

To Whom It May Concern:

Donna Marie Collins
*County Hearing
Examiner*

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 White Willow CPA 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

Daniel DeLisi

From: Dewitt, Gregory <dewitt@bonitafire.org>
Sent: Thursday, December 18, 2025 12:39 PM
To: Daniel DeLisi
Subject: RE: Letter of Service Availability
Attachments: SKM_C360i25121812040.pdf

Mr. DeLisi,

Please see the attached letter if you have any questions or concerns please do not hesitate to contact me.

In your service,

Greg DeWitt, Fire Chief
FFCA Southwest Director
Bonita Springs Fire Control and Rescue District



Office: 239 390 7959
Cell: 239 470 9449
Pcell: 239 462 2669
dewitt@bonitafire.org

From: Daniel DeLisi <dan@delisi-inc.com>
Sent: Tuesday, December 16, 2025 8:54 AM
To: Dewitt, Gregory <dewitt@bonitafire.org>
Subject: Letter of Service Availability

Chief DeWitt,

I am writing because I represent the owner of a property along Bonita Beach Road in unincorporated Lee County, but within your fire district. The property is located approximately 1 mile east of I-75 (see attached map) with the following STRAP #s:

32-47-26-00-00001.0100
32-47-26-00-00001.0110
32-47-26-00-00001.0120
32-47-26-00-00001.0130
32-47-26-00-00001.0350

This e-mail is to request a letter of service availability for a proposed comprehensive plan amendment. The property is 47 +/- acres in size and is currently in the Density Reduction/Groundwater Resource and Wetlands Land Use Categories which allow a total of 4 units on the subject property. The proposed plan amendment will change the property to Outlying Suburban and allow for up to 94 residential units, and is being submitted concurrent with a Planned Development application.

The Plan Amendment requires that I request a letter of service availability from you. Should you have any questions, or require any additional information, please do not hesitate to contact me. I may be reached at the contact information below.

Best regards.

Daniel DeLisi, AICP
DeLisi, Inc.
239-913-7159
dan@delisi-inc.com
www.delisi-inc.com



ADDITIONAL AGENTS

Company Name:	Barraco and Associates		
Contact Person:	Jeff Wasko, PE, Steve Coleman		
Address:	2271 McGregor Blvd.		
City, State, Zip:	Fort Myers, FL 33901		
Phone Number:	239-418-0691	Email:	jeffw@barraco.net

Company Name:	Pavese Law Firm		
Contact Person:	Neale Montgomery		
Address:	1833 Hendry Street		
City, State, Zip:	Fort Myers, FL 33901		
Phone Number:	239-336-6235	Email:	nealemontgomery@paveselaw.com

Company Name:	Passarella and Associates		
Contact Person:	Shane Johnson		
Address:	13620 Metropolis Ave., Ste 200		
City, State, Zip:	Fort Myers, FL 33912		
Phone Number:	239-274-0067	Email:	shanej@passarella.net

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

Company Name:			
Contact Person:			
Address:			
City, State, Zip:			
Phone Number:		Email:	

Company Name:			
Contact Person:			
Address:			
City, State, Zip:			
Phone Number:		Email:	

White Willow CPA Lee Plan Table 1b Update

The proposed White Willow Lee Plan Amendment seeks to change the future land use category of the subject 47 acre property from Density Reduction/Groundwater Resources to Outlying Suburban. The proposed amendment is being submitted concurrently with a Residential Planned Development application for 94 residential units.

The subject property is located in south Lee County, along the north side of Bonita Beach Road. The property is in a unique location in that the City of Bonita Springs is located south of the property and in areas both to the north and west. To the north of the City of Bonita Springs is the Village of Estero. Given the property's location, the shift in population, as assumed in Table 1b would likely come from either of these two incorporated areas of Lee County. While not reflected on Table 1b, the population growth for the City of Bonita Springs and the Village of Estero were both assumed in the creation of Table 1b. Both the City of Bonita Springs and the Village of Estero have regularly approved residential planned development at densities well below the maximum allowed on the respective future land use maps. The shift in assumptions is logical for the proposed development.

TABLE 1(b)
YEAR 2045 ALLOCATIONS

Future Land Use Category		Planning District											
		District 11 Daniels Parkway	District 12 Iona / McGregor	District 13 San Carlos	District 14 Sanibel	District 15 South Fort Myers	District 16 Pine Island	District 17 Lehigh Acres	District 18 Southeast Lee County	District 19 North Fort Myers	District 20 Buckingham	District 21 Estero	District 22 Bashore
Residential By Future Land Use Category	Intensive Development	-	-	-	-	801	1	30	-	376	-	-	-
	Central Urban	7	656	32	-	3,113	-	7,233	-	2,225	-	-	-
	Urban Community	-	978	1,207	-	863	540	17,000	-	7	115	-	-
	Suburban	-	2,566	2,069	-	1,202	659	-	-	6,345	-	-	-
	Outlying Suburban	1,253	438	-	-	-	502	-	19	396	-	90	-
	Sub-Outlying Suburban	-	-	13	-	-	-	-	55	145	66	-	950
	Commercial	-	-	-	-	-	-	-	-	-	-	-	-
	Industrial	-	3	3	-	3	-	-	-	-	-	-	-
	Public Facilities	-	-	-	-	-	-	-	-	-	-	-	-
	University Community	-	-	503	-	-	-	-	-	-	-	-	-
	Destination Resort Mixed Use Water Dependent	-	8	-	-	-	-	-	-	-	-	-	-
	Burnt Store Marina Village	-	-	-	-	-	-	-	-	-	-	-	-
	Industrial Interchange	-	-	-	-	-	-	-	-	-	-	-	-
	General Interchange	58	-	-	-	-	-	-	8	14	-	-	20
	General Commercial Interchange	-	-	-	-	-	-	-	-	-	-	-	-
	Industrial Commercial Interchange	-	-	-	-	-	-	-	-	-	-	-	-
	University Village Interchange	-	-	-	-	-	-	-	-	-	-	-	-
	New Community	-	-	-	-	-	-	-	-	-	-	-	-
	Airport	-	-	-	-	-	-	-	-	-	-	-	-
	Tradeport	-	-	-	-	-	-	-	-	-	-	-	-
	Rural	1,573	-	99	-	-	227	14	-	454	50	-	1,387
	Rural Community Preserve	-	-	-	-	-	-	-	-	-	3,517	-	-
	Coastal Rural	-	-	-	-	-	1,338	-	-	-	-	-	-
Outer Island	-	2	-	-	-	55	-	-	-	-	-	-	
Open Lands	80	-	-	-	-	-	-	-	30	-	-	1,667	
Density Reduction/ Groundwater Resource	-	-	-	-	-	-	-	4,742	-	-	-	2,101	
Conservation Lands Upland	-	-	-	-	-	-	-	-	-	-	-	-	
Wetlands	-	-	-	-	-	-	-	-	-	-	-	-	
Conservation Lands Wetland	-	-	-	-	-	-	-	-	-	-	-	-	
Unincorporated County Total Residential	2,971	4,651	3,926	-	5,982	3,322	24,277	4,805	9,992	3,748	90	6,125	
Commercial	326	774	938	-	2,012	288	900	118	1,121	19	18	72	
Industrial	5	198	387	-	566	67	218	215	244	4	2	4	
Non Regulatory Allocations													
Public	3,214	4,898	6,375	-	5,883	4,831	20,267	17,992	10,117	3,052	653	3,351	
Active AG	5	13	5	-	-	2,780	35	11,945	90	630	4	550	
Passive AG	3	-	5	-	-	70	50	2,500	250	2,000	-	2,100	
Conservation	1,677	9,786	2,232	-	211	15,489	1,077	41,028	1,607	382	1,465	895	
Vacant	20	55	245	-	4	2,200	14,967	2,400	1,228	850	130	1,425	
Total	8,221	20,375	14,114	-	14,658	29,047	61,791	81,003	24,649	10,685	2,362	14,522	
Population Distribution (unincorporated Lee County)	14,723	44,132	53,974	-	76,582	13,431	161,031	18,538	110,722	5,951	741	8,653	

April 2024 (Ord. No. 02-02, 03-19, 05-19, 07-13, 09-15, 09-16, 10-15, 10-16, 10-40, 10-43, 14-14, 15-10, 16-02, 16-17, 17-12, 17-23, 18-06, 19-13, 19-14, 19-16, 20-05, 21-03, 21-09, 23-02, 23-03, 23-11, 23-17, 23-24, 23-27)



WHITE WILLOW CPA EXHIBIT M-20 JUSTIFICATION

Introduction

The Bonita Beach Road 50 property is located on the north side of Bonita Beach Road, approximately 1 ½ miles east of I-75, and approximately 2/3 of a mile east of Bonita Grande Drive, directly north of the Worthington Country Club. The subject property is located in unincorporated Lee County, contiguous the City of Bonita Springs.

Property and Area History

The proposed amendment is for a property within the unincorporated area of Lee County in the Density Reduction/Groundwater Resource Area (DR/GR). This area of DR/GR is somewhat unique in its location and history. The DR/GR was established as a land use category through a settlement agreement with the then Department of Community Affairs in 1990/1989. At the time, when Lee County adopted a 20-year plan that ran from 1990 through the year 2010, the County projected greater development density and resulting population than the County was able to justify pursuant to Rule 9J-5, FAC based on BEBR population projections. This led the DCA to raise concerns over premature development and the potential for Urban Sprawl. As a result, the DR/GR was created to lower potential densities in a vast area of Lee County, east of I-75, for the dual purpose of not over allocating development area through the year 2010.

The dual purpose of protecting properties that could be used as future water supply was added during the settlement agreement to limit development on properties near the County's well fields to protect future water supplies and to create a better legal justification for the category. The County submitted that they had to limit development in the vast area east of I-75 for future water supply since they couldn't identify the source of future water supply. The legislature later addressed this issue by requiring water management districts to adopt water supply plans which are then included in the relevant local government comprehensive plan.

Under that settlement, the Outlying Suburban future land use category extended along the area south of Bonita Beach Road approximately 2 ½ miles east of I-75 (past the subject property). East of the Outlying Suburban was designated DR/GR for the easternmost 3 sections. These easternmost sections were later removed from the DR/GR and then annexed into the City of Bonita Springs, leading to the development of Village Walk, Valencia and Bonita National Golf and Country Club. Worthington County Club, the community just south of the subject property was constructed under the Outlying Suburban future land use beginning in 1993, shortly after the settlement with DCA.

Over the last 35 years since that settlement, the corridor has transitioned from one with no development east of I-75 to suburban residential communities spanning along the entire south side of Bonita Beach Road to the County line, several miles east of the subject property. On the north side of Bonita Beach Road, multiple developments have been constructed and approved with a myriad of uses including commercial, residential, recreational vehicles, and migrant farmworker housing.

The subject property was long ago impacted by development and entirely cleared of natural vegetation. Based on historic aerials, the property appears to have been cleared and used as a shallow fill pit sometime prior to the mid-1980s. There is limited ecological value of the property itself. When the DR/GR was designated in 1990, the north side of Bonita Beach Road consisted of scattered small scale mining operations, consistent with the DR/GR, and scattered mobile home/RV parks. While the need for additional density along the Bonita Beach Road corridor could not be justified in 1990, the land use pattern of the area and the population of the County as a whole has changed dramatically in the last 35 years making the subject property ripe for development, consistent with surrounding properties.

Surrounding Land Uses

The subject property is surrounded on all sides by development. To the south of the subject property is the Worthington Country Club, a gated golf course residential community. As stated above, the suburban residential communities extend all the way east to the County line.

The development pattern in the area has extended intense land uses from I-75 along the north side of Bonita Beach Road as well, nearly to the western edge of subject property. Midtown Bonita, located on the northwest corner of Bonita Grand Drive and Bonita Beach Road, is a mixed-use development consisting of 200,000 square feet of commercial, 165 hotel units and 400 multi-family residential units. On the east side of Bonita Grand Drive is a Race Trac gas station and a residential community, Solis Grande, with approximately 157 multi-family units. Adjacent to Solid Grande to the east is the Bonita Beach Road CPD, a map amendment and zoning in progress to add 60,000 square feet of commercial uses to the corridor. Directly adjacent to the subject property on the west is an intensely developed recreational vehicle park. West of the RV park is a migrant farmworker housing development.

To the north of the property is land that has been heavily impacted and appears to be used as a residential unit and for the outdoor storage of construction equipment. To the east of the subject property is the Revana development, which in process in the City of Bonita Springs, requesting 299 residential units and 100,000 square feet of commercial.

Access and Infrastructure

The subject property has direct access to Bonita Beach Road, a fully improved 4-laned divided arterial road that extends to the County line, providing access to the urban uses along the north side of Bonita Beach Road the suburban residential developments on the south side of the road. Bonita Beach Road is designed and built with curb and gutter and side walks along the entire stretch, which is an urban roadway design. A 16-inch sewer force main and a 12-inch water main abut the property along Bonita Beach Road. A fire station with EMS services is located approximately 1 away on Bonita Grande Drive.

Unique Location

As demonstrated above, the subject property is in a unique location for a residential community. Smaller planned communities have a unique place in the housing market, providing for a more intimate community environment. The subject property already has two large lakes, providing amenitized views, and direct access to Bonita Beach Road. There are no similar parcels in the area.

There are a few parcels of similar size to the north in the Bonita Springs DR/GR as shown on the attached exhibit prepared by Passarella and Associates for their Alternatives Analysis submitted to the Army Corps of Engineers for the Section 404 permit application. While other parcels exist, none are as suitable for development as the subject property. None of these parcels are as well located, directly on Bonita Beach Road and surrounded by development and infrastructure.

Justification

There is very little about the subject property to characterize it as non-urban, other than a land use category that was adopted to limit density during the 1990-2010 timeframe based on a rule that is no longer in effect. The surrounding uses are urban in nature, the property is in a location with urban infrastructure and the property is along and has direct access to an urban arterial road. To the north of the subject property, north of Kehl Canal, is the Corkscrew Regional Watershed area (CREW), which the property is not contiguous to. Separating the subject property from CREW is a business that has cleared their property, utilizing it for what appears to be outdoor storage of heavy construction equipment.

The subject property itself has been entirely cleared with most of the property having previously been excavated. In reviewing historic aerials from within the last decade, the subject property was nearly entirely cleared of vegetation. There are no areas of the

subject property that are considered indigenous due to the high level of exotic infestation. According to the environmental report from Passarella and Associates:

A total of ten vegetative and land cover types (i.e., FLUCFCS codes) were identified on the Project site. The dominant land uses on the Project include mixed exotics, lakes, and hydric disturbed land, which together occupy 35.07± acres or 75 percent of the site. The site contains disturbed non-native wetland systems, consisting of exotic wetland hardwoods and hydric disturbed land habitat types. The on-site wetland habitats have been disturbed by ditches, lakes, and exotic vegetation. There are no rare or unique upland habitats on the Project site.

Similarly, the hydrology of the property has been severely altered by development activity on the subject property and the surrounding properties. According to the RESPEC Hydrologic analysis “*surface water hydrology on the property differs substantially from pre-development conditions. Mining-related disturbances have fragmented natural flow paths and created isolated subbasins with limited surface water connectivity. Groundwater hydrology has also been altered due to limestone excavation that penetrated the upper Tamiami Formation, a geologic unit comprising the unconfined Surficial Aquifer System (Water Table Aquifer).*”

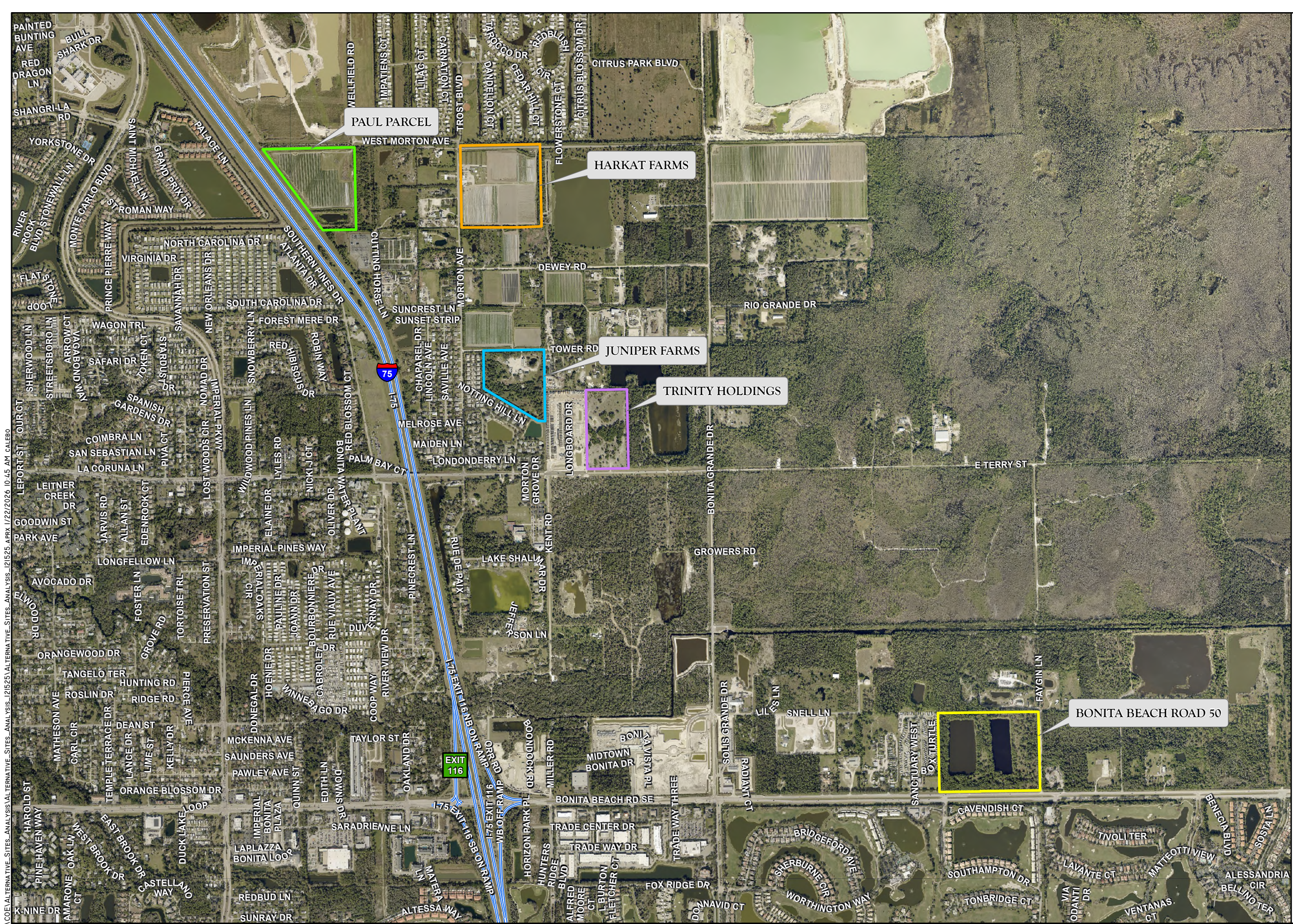
In short, there is nothing environmentally or hydrologically sensitive about the subject property, and the density no longer needs to be depressed based on a Rule 9J-5, FAC population accommodation analysis. The reasoning for keeping densities low in the 1990 settlement agreement no longer legally or factually exists, especially at this location. Therefore, the Density Reduction/Groundwater Resource future land use category is no longer applicable to the subject property in any manner. Development of the subject property would now be considered an orderly growth pattern.

The properties surrounding the White Willow property were in the Outlying Suburban future land use category at the time of the 1990 Settlement with the then Department of Community Affairs. Given the significant changed conditions since that time, the significant increase in population, the subject property should be similarly placed in the same future land use category that the adjacent properties developed under.

The Bonita Beach Road corridor is distinctly suburban in character. As the corridor continues to develop, attracting uses like Midtown Bonita, which is urban in character, an argument could be made for the subject property to be placed in the Suburban future land use category. The subject property is arguably no longer “peripheral” to urban areas but on the fringe of an established urban area, as described in the Suburban future land use category.

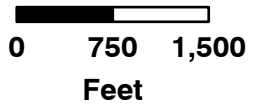
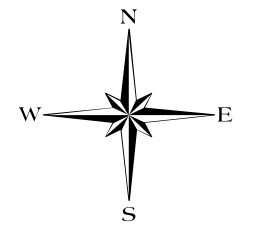
The character of the corridor has changed dramatically since the early 1990s when it first started to develop on the periphery of Bonita Springs, in what at the time was a

rural, active agricultural area in Outlying Suburban land use category. The tomato fields and packing houses are long gone. Now the character of the corridor, and the land uses surrounding the subject property make the proposed development infill in nature, which would warrant a higher density land use category, such as Suburban. However, given the on-site lakes and the development constraints, the Outlying Suburban future land use category is applicable for the proposed development and will create a step down of intensity to the CREW lands to the north.



LEGEND

- BONITA BEACH ROAD 50
- JUNIPER FARMS
- PAUL PARCEL
- HARKAT FARMS
- TRINITY HOLDINGS



NOTES:

AERIAL PHOTOGRAPHS WERE ACQUIRED THROUGH THE LEE COUNTY PROPERTY APPRAISER'S OFFICE WITH A FLIGHT DATE OF JANUARY - MARCH 2025.

PROPERTY BOUNDARY PER BARRACO AND ASSOCIATES, INC. DRAWING No. 24350S00.DWG DATED OCTOBER 17, 2025.

ALTERNATE SITES ESTIMATED FROM THE CHARLOTTE COUNTY PROPERTY APPRAISER'S GIS WEBSITE.

J:\2024\24CIG4280\ALTERNATIVE_SITES_ANALYSIS\ALTERNATIVE_SITES_ANALYSIS_121525_APRX_12272026_10:45_AM_CALERO

REVISIONS	DATE	DRAWN BY	DATE
		P.F.	12/15/25
		DESIGNED BY	DATE
		S.J.	12/15/25
		REVIEWED BY	DATE
		S.J.	12/15/25

13620 Metropolis Avenue
Suite 200
Ft. Myers, FL 33912
Phone (239) 274-0067
Fax (239) 274-0069



**BONITA BEACH ROAD 50
ALTERNATIVE SITES LOCATION MAP**

DRAWING No.	24CIG4280
SHEET No.	FIGURE 1

