

Exhibit C

GULF COAST HEALTH PARK CPD REQUEST NARRATIVE

SUMMARY OF REQUEST

The attached application is for an Administrative Amendment to the Gulf Coast Health Park (GCHP) CPD to modify the approved Master Concept Plan and previously approved development program. The subject property is located along the east side of Metro Parkway, north of Diamond Center Court, in the Intensive Development future land use category and designated within the Mixed-Use Overlay on the Future Land Use Map. The Applicant, West77 Partners, proposes to construct a hotel on the southern portion of the GCHP CPD. The remaining uses within the GCHP CPD have been re-oriented on the remainder of the site.

Zoning Resolution Z-11-018 was approved on December 5, 2011, and allowed a maximum of 160,000 square feet of commercial use, 130 hotel rooms, and an assisted living facility with a maximum density 125 beds. An assisted living facility (ALF) containing 120 beds (30 equivalent dwelling units) was approved on the northern portion of the project in 2015 under DOS2014-00089. The master infrastructure for the entire development was also approved and constructed with this Development Order. No other development has occurred to date on the remaining approximately 6 +/- of developable acreage.

A previous Administrative Amendment to the GCHP CPD (ADD2022-00208) which intended to accommodate the construction of an age restricted multi-family project was submitted and approved in 2022. ADD2022-00208 adjusted the development program by adding Residential, Multi-Family as an approved use, increasing equivalent residential density, decreasing the non-residential intensity, and removing the hotel use. The active adult multi-family project did not materialize. Current market conditions have initiated this request to replace the previously approved Administrative Amendment with an Administrative Amendment that retains the hotel use in the development program as originally approved in Z-11-018.

To accommodate the additional non-residential intensity associated with retaining the hotel use, the requested multi-family residential density is reduced compared to the prior ADD as well as the original Zoning Resolution. This replacement Amendment seeks to (compared to Z-11-018):

- Add Residential, Multi-Family as a use to the Schedule of Uses
- Decrease the equivalent residential density to 118 units (from 125 equivalent units)
- Decrease the commercial intensity to 50,000 square feet (from 160,000 square feet)

In accordance with the LDC in place at the time Z-11-018 was approved and Development Order DOS2014-00089 was issued, assisted living facility units were calculated at a ratio of four units per one equivalent residential unit. Based on this calculation, the 120 bed ALF equates to 30 equivalent dwelling units. Therefore, based on this ADD request, 88 dwelling

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units would remain available when the 30 equivalent units are deducted from the requested total of 118 dwelling units.

Overall, the revised intensities result in reduced peak-hour traffic generation and lower water and sewer demand when compared to the development intensity previously approved under Resolution Z-11-018. The total density for the project is within the Intensive Development/Mixed Use Overlay standard density range.

There are no proposed changes to the indigenous or wetland preserve areas, open space, or perimeter landscape buffers. The amendment does not propose any changes to the project's access points or configurations and maintains the inter-connectivity to the existing projects to the north and south.

ADJACENT USES

There is an existing office complex, Diamond Professional Center, to the south. To the north is the existing Gulf Coast Hospital campus and several individual medical use buildings. To the west are office uses and to the east is South Fort Myers High School.

ACCESS

The subject property is located on the east side of Metro Parkway, south of Gulf Coast Hospital and north of the existing Diamond Professional Center. Access to the site is from Metro Parkway via an existing driveway known as Alliance Lane. The parcel to the north includes a street stub south toward the subject property known as Doctor's Way. This stub is partially constructed but does not physically connect to the site. The Gulf Coast Health Park project has been designed to accommodate a connection to the north should the future development of the adjacent development support an interconnection.

The design of the internal roadway proposes improvement of the existing driveway (Alliance Lane) - a stub for future cross connection to the north, then turning south, generally parallel to Metro Parkway then intersecting with Diamond Court adjacent an existing access point. This design provides for the continuation of Doctor's Way and the creation of a continuous interconnection of Gulf Coast Hospital, through the subject property to Diamond Professional Center.

REVIEW CRITERIA

In accordance with Land Development Code Section 34-174(i) Administrative Amendments to Planned Developments may be approved under the following findings and criteria:

a) Does not increase height, density or intensity of the development;

No changes are made to the allowable building height in the CPD. Proposed utility and trip generation are below the demands forecasted in the development program approved under Z-11-018.

b) Does not result in the substantial underutilization of public resources and public infrastructure committed to the support of the development;

In this specific location there is no underutilization of resources with or without the project. There is neither an increase nor decrease in trips on the roadway network, and the integration of residential uses in the commercial environment is maintained. There is a minimal decrease in water and sewer demand based on the proposed amendment. Both are further defined below.

Trip Generation:

Consistent with the original Zoning Resolution, the site was approved for 125 equivalent residential dwelling units, 160,000 sq. ft. of commercial uses (of which, up to 60,000 sq. ft. can be retail), and 130 hotel rooms. According to the attached transportation memo from TR Transportation, there are 772 total weekday PM peak hour trips anticipated for the originally approved development.

Modifying the uses to 50,000 square feet of commercial uses (assuming all retail), 88 residential dwelling units (again, assuming multi-family dwelling units), and 130 hotel rooms would result in a Weekday PM Peak hour trip generation of 343 trips, or a reduction of 429 trips. According to the conclusion of the transportation memo, “The proposed ADD reduces the weekday peak hours and daily trips from the originally approved CPD as result of the change in uses and will not have a significant impact on the surrounding roadway network than what was originally analyzed in the zoning approval.” Please refer to Table 1 summarizing the trip generation from each zoning case.

TABLE 1: TRIP GENERATION SUMMARY

ZONING CASES	WEEKDAY A.M. PEAK HOUR			WEEKDAY P.M. PEAK HOUR			DAILY (2-WAY)
	IN	OUT	TOTAL	IN	OUT	TOTAL	
ZONING RESOLUTION Z-11-018	283	153	436	319	453	772	9,491
ADD2022-00208	68	90	158	177	158	335	4,437
CURRENT REQUEST - ADD2025-00265	83	86	169	176	167	343	4,644

Water & Sewer Demands:

Comparing the water and sewer demands of the existing ALF plus the remaining intensities permitted for hotel and non-residential uses from the original zoning approval results in an Average Daily Flow of 60,650 Gallons per Day (GPD). Note, this excludes the allowed remaining residential units. Based on the proposed Amendment, the Average Daily Flow of 56,900 GPD results in a reduction of approximately 6 percent. Please refer to Table 2 summarizing the water and sewer demands from each zoning case.

TABLE 2: WATER AND SEWER DEMAND SUMMARY

LAND USES	HOTEL	MULTI-FAMILY	ASSISTED LIVING FACILITY (EXISTING)	WELLNESS CENTER	RETAIL	MEDICAL OFFICE	GENERAL OFFICE	
FLOW RATE UNITS	100	200	115	30	0.1	25	15	
	gpd/room	gpd/unit	gpd/bed	gpd/100 sf	gpd/sf	gpd/100 sf	gpd/100 sf	
ZONING CASES	EXPECTED UNITS							
Zoning Resolution Z-11-018	130	0	120	39,000	40,000	60,000	21,000	
ADD2022-00208	0	150	120	0	0	50,000	0	
Current Request - ADD2025-00265	130	88	120	0	0	50,000	0	
AVERAGE DAILY FLOW (ADF) (GPD)								TOTAL ADF (GPD)
Zoning Resolution Z-11-018	13,000	0	13,800	11,700	4,000	15,000	3,150	60,650
ADD2022-00208	0	30,000	13,800	0	0	12,500	0	56,300
Current Request - ADD2025-00265	13,000	17,600	13,800	0	0	12,500	0	56,900



- c) **Does not result in a reduction of total open space provided on the Master Concept Plan by more than ten percent;**
The proposed amendment will not decrease the open space required by the Planned Development or land development code.
- d) **Does not decrease the amount of indigenous native vegetation preservation or open space areas below the amount required by the Code;**
The proposed amendment will not decrease to the indigenous vegetation or open space required by the Planned Development or land development code. All of the required indigenous preservation was established in the initial Development Order DOS2011-00089.
- e) **If changes to the buffer or landscaping areas are proposed, equivalent or better (by comparison with the approved Master Concept Plan) landscaping or buffering is provided;**
No changes to buffers are proposed as a component of the proposed amendment.
- f) **Does not adversely impact surrounding land uses;**
The proposed use is complimentary to the existing onsite and surrounding uses.
- g) **Is consistent with applicable provisions of the Lee Plan and land development regulations in effect at the time of the amendment request.**
The property is in the Intensive Development future land use category and the Mixed-Use overlay. Both would allow the proposed development at the density being requested. The administrative action does not request any deviations beyond those that could be approved administratively and will comply with the regulations established in the Planned Development and the Land Development Code.

In accordance with Land Development Code Section 34-174(j)(2) Administrative Amendments to Planned Developments within the Mixed-Use Overlay may be approved under the following findings and criteria:

- a) **Will allow for internal capture of vehicular trips;**
The attached Master Concept Plan proposes development that will include connections and stub outs to adjacent development. In addition, the location of the multi-family along this corridor will allow close access to commercial needs without having to drive or access the major roadway network. Access to medical care and retail shopping and dining are all available within the internal roadway network that extends north and east to Plantation Road. The immediate area's mix of residential with office/medical uses and retail/restaurants allows for internal capture.
- b) **Will provide for connections to adjacent uses;**
As previously noted, the Gulf Coast Health Park Project shares access to Metro Parkway with Diamond Professional Center via Diamond Center Court. The internal roadway (Doctor's Way) aligns with the Diamond Center access and allows the interconnection between the two adjacent projects with a continuous accessway parallel to Metro Parkway and internal access to the east to Plantation Road. To the north, a stub-out has been provided to the adjacent Lee Memorial property for a potential future connection.
- c) **Will allow for urban forms of development and a variety of uses;**
The multi-family component will complement the assisted living facility to the north and the adjacent hospital use. The location of this use in and amongst a highly urban commercial area

allows for easy access to commercial needs and better utilization of the commercial corridor. This mix provides for a more integrated overall community at this location.

d) Will not result in the substantial underutilization of public resources and public infrastructure committed to the support of the development;

Please refer to the previous response demonstrating compliance with this requirement under 34-174(i)(2)(b).

e) Will not decrease the amount of indigenous native vegetation or preservation area below the amount required by Code;

The proposed amendment will not decrease the indigenous vegetation or open space required by the Planned Development or land development code.

f) Will not adversely impact surrounding land uses; and

The proposed use is complimentary to the existing onsite and surrounding uses.

g) Is consistent with applicable provisions of the Lee Plan and land development regulations in effect at the time of the amendment request.

Please refer to the previous response demonstrating compliance with this requirement under 34-174(i)(2)(g).

CONCLUSION

The proposed amendment seeks to include hotel use in the approved planned development by decreasing the allowable amount of multifamily dwelling units from the existing approval. The proposed amendment provides for a better mix of uses in the area, meets the criteria for approval, and furthers the intent of the Lee Plan by creating more of a mixed-use environment within the area of the subject property.