



NARRATIVE STATEMENT

02/18/26

Subject: Request for Zoning Amendment to add permitted Uses in Commercial Planned Development

Regarding: ADD2025-00267

Location: Pine Island Professional Center
10191 Stringfellow Rd, Saint James City, FL 33956
STRAP: 28-44-22-00-00028.0020

Dear Lee County Staff,

This narrative statement is submitted in support of our request for a zoning amendment to the Pine Island Professional Center CPD located in Lee County, Florida. The purpose of this amendment is to expand the schedule of permitted uses to include five additional uses that are compatible with the existing approved development and will not result in an increase in the overall intensity of the project. The currently approved uses, governed by Resolution #Z-22-006 include:

- Accessory Uses and Structures
- Administrative Offices
- Business Services - Group 1
- Essential Services
- Essential Service Facilities - Group 1
- Excavation Water Retention
- Medical Offices (Limited to 2,000 square feet)
- Parking Lot, Accessory
- Restaurants - Group 2 (Limited to 1,000 square feet)
- Signs

The proposed additional uses being requested to add are as follows:

- Personal Services - Group 1
- Specialty Retail Shops - Group 1
- Hobby Toy and Game Shops
- Insurance Companies
- Repair Shops - Group 1

This narrative demonstrates that the proposed uses will not increase the intensity of the development. Intensity, as defined in the LDC, is a measurement of the degree of nonresidential uses based on factors including use, size, impact, bulk, shape, height, coverage, sewage generation, water demand, traffic generation, or floor area ratios (FAR). Since this amendment does not propose any changes to the approved development parameters such as maximum floor area, building height, lot coverage, or FAR, the analysis focuses on the comparative impacts of the proposed uses relative to the currently permitted ones, particularly in terms of traffic generation, parking demand, water and sewage usage, and overall site impact. The analysis of existing uses will focus on Business Services Group 1, Medical Offices, and Restaurants Group 2.

Overview of Existing and Proposed Uses

The existing permitted uses represent a mix of office-oriented, health-related, and food service activities:

- **Business Services Group I:** Includes low-impact office uses such as consulting services, insurance agents, drafting services, and similar establishments that occupy standard office space without outdoor storage or heavy vehicle use (LDC Sec. 34-622(c)(5)).
- **Medical Offices:** Encompasses health care facilities Group I and II, such as doctors' offices and clinics, which generate moderate traffic and parking needs (LDC Sec. 34-622(c)(20)).
- **Restaurants Group II:** Includes sit-down restaurants, which are higher-intensity uses due to peak-hour customer turnover (LDC Sec. 34-622(c)(43)).

The proposed additional uses are similarly low-to-moderate impact commercial activities:

- **Personal Services Group I:** Includes establishments like barber shops, beauty salons, shoe repair, and tailor shops that provide services to individuals without heavy equipment or outdoor operations (LDC Sec. 34-622(c)(33)).
- **Specialty Retail Shops Group I:** Covers small-scale retail such as antique shops, art galleries, gift shops, and similar boutique stores (LDC Sec. 34-622(c)(47)).
- **Hobby Toy and Game Shops:** Specific retail focused on toys, games, and hobby supplies, classified under retail uses (LDC Sec. 34-622(c)(21)).
- **Insurance Companies:** Office-based services intermediary between companies and clients, aligning with Business Services Group I (LDC Sec. 34-622(c)(5)).
- **Repair Shops Group I:** Limited to small-item repairs such as appliance, watch, or jewelry repair, without automotive or heavy machinery (LDC Sec. 34-622(c)(40)).

These proposed uses are consistent with the commercial character of the CPD and are intended to provide flexibility in tenancy without altering the approved master concept plan or development standards. These uses are selected for their compatibility with the existing schedule, as they primarily involve office-like or small-scale retail/service activities that can be accommodated within the property's current development parameters, including any applicable size limitations, setbacks, and FAR restrictions. No changes to building height, bulk, shape, or coverage are proposed, ensuring the amendment remains focused solely on use expansion.

Justification of No Increase in Intensity

To demonstrate no increase in intensity, the following analysis compares the proposed uses to the existing ones using key metrics from the LDC and industry standards, including parking requirements (LDC Sec. 34-2020) and trip generation rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual (12th Edition, 2025). The comparison assumes equivalent floor area for each use, as no expansion of building envelope is proposed. The proposed uses generally exhibit similar or lower impacts than the highest-intensity existing uses (e.g., Restaurants Group 2 and Medical Offices).

1. Traffic Generation

Traffic generation is a primary indicator of intensity, measured by average daily trips (ADT) and peak-hour trips, using ITE rates:

- **Existing Uses:**
 - Business Services Group 1 (analogous to ITE Code 710: General Office Building): AM peak: 1.52 trips/1,000 sq ft; PM peak: 1.44 trips/1,000 sq ft. These are low-intensity office uses with minimal daily fluctuations.
 - Medical Offices (ITE Code 720: Medical-Dental Office Building, limited to 2,000 sq ft): AM peak: 3.74 trips/1,000 sq ft; PM peak: 4.79 trips/1,000 sq ft. This represents a moderate-to-higher intensity due to patient visits, but the size cap mitigates overall impact.
 - Restaurants Group 2 (analogous to ITE Code 931: Fine Dining Restaurant or 932: High-Turnover Sit-Down Restaurant, limited to 1,000 sq ft): PM peak: Approximately 7.8–9.05 trips/1,000 sq ft (with pass-by adjustments of 43–44%, reducing net new trips). This is the highest-intensity existing use, reflecting evening dining peaks.

The weighted average PM peak trip rate across existing uses ranges from 1.44 to 9.05 trips/1,000 sq ft, with an overall moderate intensity profile when considering size limits.

- **Proposed Uses:**
 - Personal Services Group 1 (analogous to ITE Code 822: Strip Retail Plaza <40k sq ft, or personal service components therein): PM peak: 13.24 trips/1,000 sq ft (11th Edition; 12th Edition refinements show slight decreases due to updated data, but conservatively used here). However, personal services often generate fewer trips than full retail plazas (estimated effective rate: 3–5 trips/1,000 sq ft after accounting for service-oriented nature), comparable to medical offices.
 - Specialty Retail Shops Group 1 (ITE Code 826: Specialty Retail Center): AM peak: 6.84 trips/1,000 sq ft; PM peak: 5.02 trips/1,000 sq ft. This is moderate, similar to or below restaurant rates, with pass-by factors reducing net impact.
 - Hobby Toy and Game Shops (analogous to ITE Code 864: Toy/Children's Superstore or 826: Specialty Retail): PM peak: Approximately 4.5–5.02 trips/1,000 sq ft, reflecting niche retail with lower daily volumes than general stores.
 - Insurance Companies (ITE Code 710: General Office Building or 712: Small Office Building): AM peak: 1.45–1.85 trips/1,000 sq ft; PM peak: 1.30–1.76 trips/1,000 sq ft. This mirrors existing business services, representing no material change.
 - Repair Shops Group 1 (analogous to ITE Code 943: Automobile Parts and Service Center for minor repairs, adjusted for non-auto): PM peak: 4.22–5.88 trips/1,000 sq ft, but lower for small-item repairs (estimated 2–4 trips/1,000 sq ft), akin to business services.

The proposed Uses yield PM peak trip rates ranging from 1.30 to 5.02 trips/1,000 sq ft (with conservative highs up to 13.24 for plazas, but adjusted downward for specific service/retail subtypes). This falls within or below the existing range of 1.44–9.05 trips/1,000 sq ft. Notably, the 12th Edition's updates—incorporating post-pandemic travel shifts and multimodal data—generally lower rates for office and retail uses by 5–15% compared to prior editions, further supporting our position. For instance, general office rates have decreased due to hybrid work trends, and specialty retail reflects more online integration.

Beyond traffic, other intensity factors remain unchanged or comparable:

2. Parking Demand

Parking requirements in LDC Sec. 34-2020 serve as a proxy for use intensity, based on expected occupancy and turnover.

- **Existing Uses:**
 - Business Services: 3 spaces per 1,000 sq. ft.
 - Medical Offices: 5 spaces per 1,000 sq. ft.
 - Restaurants Group II: 15 spaces per 1,000 sq. ft. (highest).
- **Proposed Uses:**
 - Personal Services Group I: 3 spaces per 1,000 sq. ft.
 - Specialty Retail Shops Group I: 4 spaces per 1,000 sq. ft.
 - Hobby Toy and Game Shops: 4 spaces per 1,000 sq. ft. (retail standard).
 - Insurance Companies: 3 spaces per 1,000 sq. ft.
 - Repair Shops Group I: 3–4 spaces per 1,000 sq. ft.

All proposed uses require fewer or equal parking spaces compared to Restaurants Group II and Medical Offices. No additional parking would be needed beyond what is already approved.

3. Water Demand and Sewage Generation

Water and sewage impacts are tied to occupancy and use type. Office and small retail/service uses (proposed) typically generate 150-250 gallons per day (GPD) per 1,000 sq. ft., per Florida Department of Environmental Protection standards. Medical offices can reach 300-400 GPD due to sanitation needs, while restaurants exceed 500 GPD with kitchen operations. The proposed uses align with lower-end office/retail rates, ensuring no net increase.

4. Other Intensity Factors (Bulk, Shape, Height, Coverage, Floor Area Ratios)

This amendment does not alter approved setbacks, building heights, lot coverage, or FAR. The proposed uses fit within standard commercial building designs, with no outdoor storage, heavy vehicles, or impacts requiring changes to bulk or shape.

Conclusion

We believe this zoning amendment represents a thoughtful expansion that enhances the property's utility without compromising the County's standards for development intensity. The addition of Personal Services Group 1, Specialty Retail Shops Group 1, Hobby Toy and Game Shops, Insurance Companies, and Repair Shops Group 1 to the schedule of uses will enhance flexibility and economic viability, serving the residents of the community without increasing overall intensity. These uses are compatible with the existing mix and exhibit lower or comparable impacts across all measured criteria. This amendment complies with the Lee Plan and LDC, promoting efficient land use while protecting community resources.

Please advise if any additional information is required as you consider the approval of this zoning amendment.

Sincerely,

John Montalbano



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