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LANDSCAPE ARCHITECTS**Gulf Coast Town Center MPD****Administrative Amendment to a Planned Development****Request Narrative****I. Request Summary**

Vision Fort Myers, LLC ("Applicant") is requesting an administrative amendment to Lots 2 and 4 only of the previously approved Gulf Coast Town Center Mixed Use Planned Development (MPD) zoning (Z-00-024, as amended) for the following deviation related to illumination requirements that apply only to the Hampton Inn hotel:

1. Add Deviation #25 to allow for relief from illumination requirements for vehicular areas along property lines of the Hampton Inn hotel.
2. Amend MCP to add proposed Deviation #25 symbol to Lots 2 and 4.

The Property is designated as C/O/H and is located on Lots 2 and 4 on the MCP. The Property is directly north and west of Connor's Steakhouse (Lot 3), directly east of LA Fitness (Lot 1), and on the north side of Gulf Center Drive and west side of Royal Queen Blvd. The Property lies within the University Village Interchange FLU and is within the University Community Planning Area.

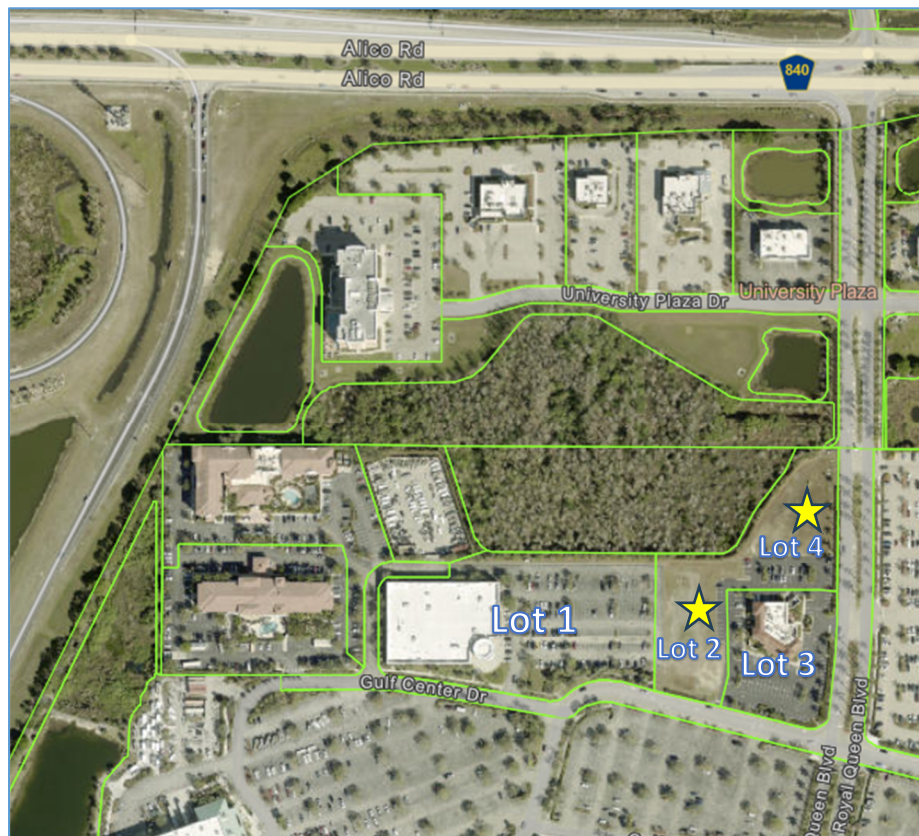


Figure 1: Aerial of Property

EXHIBIT C

II. Background and Approval History

The original overall 244± acres were originally rezoned from AG-2 to MPD with approval of a Development or Regional Impact (DRI) by Z-00-024. The zoning and DRI have been amended several times administratively and through the public hearing process as outlined in the submitted Previous Zoning Actions Summary. The most recent amendment to the DRI was approved via Z-20-030 and the most recent public hearing amendment to the MPD zoning was approved via Z-24-017, which relocated the Costco gas station facility and increased the number of fuel pumps from 8 to 30.

The request remains in compliance with the Lee Plan, the Gulf Coast Town Center DRI Development Order, and DRI Map H Master Plan Gulf Coast Town Center.

There is one (1) Development Order approved for the subject Property (Lots 2 and 4), which allows for the development of a 115-room Hampton Inn hotel and associated infrastructure (DOS2025-00165). The requested deviation is limited to the photometrics/illumination requirements for the Hampton Inn hotel only. There are no other amendments or deviations being requested as part of this application.

III. Administrative Amendment to Planned Development Findings

The requested administrative amendment complies with LDC Section 34-174(i)2 as outlined below:

a. Does not increase height, density or intensity of the development, except as permitted in Chapter 2

The request does not increase height, density, or intensity of development. The request is limited to the addition of one (1) deviation related to illumination requirements for parking lots specific to the Hampton Inn located on Lots 2 and 4.

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

The request does not result in the substantial underutilization of public resources and public infrastructure committed to the support of the development. The requested deviation will allow the applicant to develop the property with a Hampton Inn hotel with appropriate and safe lighting, which supports the local economy and traveling public of Lee County.

c. Does not result in a reduction of total open space provided on the Master Concept Plan by more than ten percent;

The request will not result in a reduction of total open space provided on the MCP. The request is limited to a single deviation related to illumination levels in parking areas adjacent to Lots 1 and 3. There is no change proposed to open space, and approval of the requested deviations will not result in a reduction of total open space provided on the MCP.

d. Does not decrease the amount of indigenous native vegetation preservation or open space areas below the amount required by the Code;

The request does not decrease the amount of indigenous native vegetation preservation or open space areas below the amount required by Code. The request is limited to a single deviation to address illumination levels at property lines. There are no changes proposed to the indigenous preserve acreages or locations.

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;

There are no changes proposed to the buffers or landscaping areas. The proposed buffers are in compliance with the LDC requirements and MCP.

f. Does not adversely impact surrounding land uses; and

The request does not adversely impact surrounding land uses. The Property represents an infill site in a mostly developed and highly urbanized shopping center with an intense mix of uses. Non-residential development or roadways exist on all sides of the Property except where the Property abuts internal preserve areas to the north. All of the surrounding lands are within the MPD boundary. The proposed deviation addresses the lighting in the parking lot of the hotel and along the property lines adjacent to LA Fitness and Connor's Steakhouse where shared vehicular areas exist. The deviation does not adversely affect surrounding land uses as they are commercial in nature and compatible with the proposed hotel. The deviation is limited to addressing illumination levels where the project cannot meet the code requirement. The requested deviation is somewhat common throughout Lee County especially in larger planned developments, and the GCTC MPD has approved similar deviations on other commercial parcels within the MPD for the same reasons. The required buffers and setbacks will not be impacted or changed by this request.

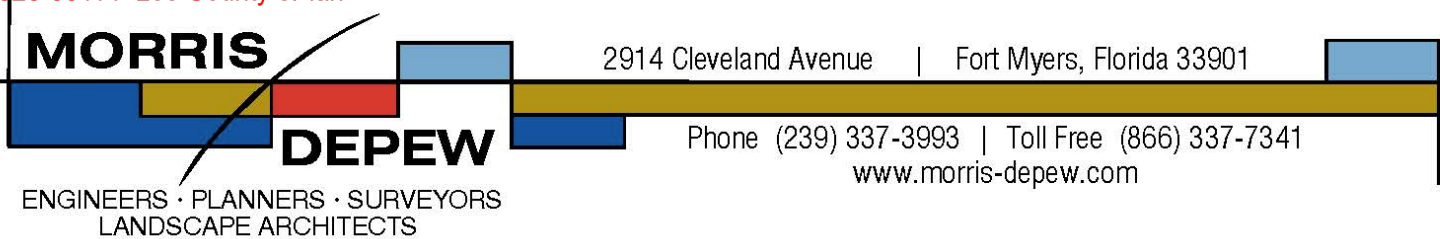
g. Is consistent with all applicable provisions of the Lee Plan and land development regulations in effect at the time of the amendment request.

The request is consistent with all applicable provisions of the Lee Plan and LDC at the time of the amendment request, except where a deviation is requested. The Property is located within the University Village Interchange Future Land Use category, which is categorized as lands suited to accommodate high densities and intensities in an area of the county with available levels of public services. Except for where the one (1) illumination requirement deviation is being requested, the proposed hotel complies with the land development regulations and has been approved per DOS2025-00165.

IV. Conclusion

The requested administrative amendment to the MPD do not increase the density or intensity of the MPD, does not reduce required landscape buffers, does not reduce required or approved open space acreage, and does not reduce the approved indigenous preserve as shown on the currently approved MCP. The

request is limited to a single deviation from the LDC related to illumination requirements for the Hampton Inn hotel located on Lots 2 and 4. The requested amendment protects public health, safety and welfare.



Gulf Coast Town Center MPD
Hampton Inn Hotel
Administrative Amendment to a Planned Development

Deviations & Justifications Narrative

1. Deviation #25 from LDC Sec. 34-625, Outdoor lighting standards, Table 1, Note (2) requirement for illumination levels not to exceed 0.5 footcandles at the property lines, to provide minimum illumination levels of 0.8 footcandles throughout vehicular traffic areas along the property lines of Lots 2 and 4 in accordance with Table 1 Use/Task requirements for Medium vehicular / pedestrian activity, with the average light level at the property lines not to exceed 1.8 footcandles. Development shall be consistent with the Lot 2 & 4 Site Lighting Photometric Plan and Site Lighting Fixture Plan Exhibit.

Justification: The Applicant is requesting this deviation due to the unique internal lot configuration and shared access pattern within Gulf Coast Town Center. Lots 2 and 4 (Hampton Inn Hotel) function as part of an integrated commercial development with shared vehicular circulation areas that extend across internal lot lines adjoining Lot 1 (LA Fitness) and Lot 3 (Connor's Steakhouse). As a result, the internal property lines between these lots do not function as transitions between incompatible land uses, but rather as shared circulation areas serving complementary commercial uses.

Strict compliance with both the maximum illumination level of 0.5 footcandles at the property line and the minimum illumination level of 0.8 footcandles required for Medium Vehicular/Pedestrian Activity areas creates a practical conflict. In locations where active vehicular circulation occurs directly adjacent to the internal lot lines, it is not feasible to maintain the required minimum lighting levels necessary for safe circulation while simultaneously reducing illumination to 0.5 footcandles at the property line.

The requested deviation will allow adequate illumination of parking and circulation areas to promote pedestrian visibility, driver awareness, and overall site safety, while maintaining lighting levels that are consistent with the character and operational needs of an integrated commercial development. The deviation is limited solely to the internal lot lines between commercially developed parcels and does not apply to the external boundaries of the MPD, adjacent preservation areas, public rights-of-way, or any residentially sensitive areas. As proposed, the deviation preserves the intent of the outdoor lighting standards, minimizes off-site impacts, and promotes the public health, safety, and welfare by ensuring adequate lighting within active vehicular and pedestrian use areas.