Lee County, Florida
DEPARTMENT OF COMMUNITY DEVELOPMENT
ZONING SECTION
STAFF REPORT

CASE NUMBER: DCI2025-00028
TYPE OF CASE: Residential Planned Development
CASE NAME: White Willow RPD
TOTAL ACREAGE AFFECTED BY REQUEST: 47+/- acres
SUFFICIENCY DATE: July 22, 2026
HEARING EXAMINER DATE: October 15, 2026

REQUEST:
DeLisi, Inc., on behalf of Pulte Homes, has filed an application to rezone approximately 47+/- acres from Agricultural (AG-2) to Residential Planned Development (RPD) to allow a maximum of 94 single-family dwelling units.

The subject property consists of five STRAP numbers, (32-47-26-00-00001.0350, 32-47-26-00-00001.0110, 32-47-26-00-00001.0130, 32-47-26-00-00001.0100, and 32-47-26-00-00001.0120) and currently resides within the Density Reduction/Groundwater Resource and the Wetlands Future Land Use Categories as established by the Lee County Comprehensive Plan (the Lee Plan). The sketch and legal description for the properties may be found as Attachment D. In conjunction with the request, the applicant submitted a small-scale map amendment requesting to change the Future Land Use category of the parcels from Density Reduction/Groundwater Recharge (DR/GR) to Outlying Suburban.

The applicant has requested two (2) deviations from Land Development Code (LDC) requirements related to required street access and connection separation (Attachment I).

Staff recommends **APPROVAL** of the applicant's request with Conditions found in Attachment C, and contingent upon adoption of CPA2026-00004.

PARCEL HISTORY:

The subject property and surrounding lands have historically experienced significant disturbances beginning with the excavation of the Kehl Canal in the early 1960s. The canal, constructed to drain lands east of the Imperial River, severed hydrologic connections between the site and the Corkscrew Swamp Regional Ecosystem Watershed (CREW) and altered historical north-to-south surface water flow paths. The subject property is located approximately 1,300 feet south of the Kehl Canal.

Resolution Z-74-227 (Attachment W), approved a special permit to allow the site to be used as a mining borrow pit.

Prior to this request, DeLisi, Inc. on behalf of Pulte Homes submitted a comprehensive plan amendment (CPA2025-00013), requesting to amend the Future Land Use Map for the 47+/- acre property from Density Reduction/Groundwater Resources to Outlying Suburban. The request was one of eleven privately initiated text and map amendments submitted between 2023 and 2026 to support projects within the Southeast Lee County Community Plan Area, prompting staff to request direction from the Board of

County Commissioners (BOCC) to allow consideration of all eleven requests collectively. Subsequently, a County-initiated Amendment to Southeast Lee County was prepared by staff under CPA2026-00004. This Comprehensive Plan Amendment included the redesignation of the subject properties to Outlying Suburban and was transmitted to the state reviewing agency by the Board of County Commissioners (BOCC) on August 19, 2026 (Attachment U). Figures 1 and 2 depict the existing and future proposed Future Land Use changes to the area.

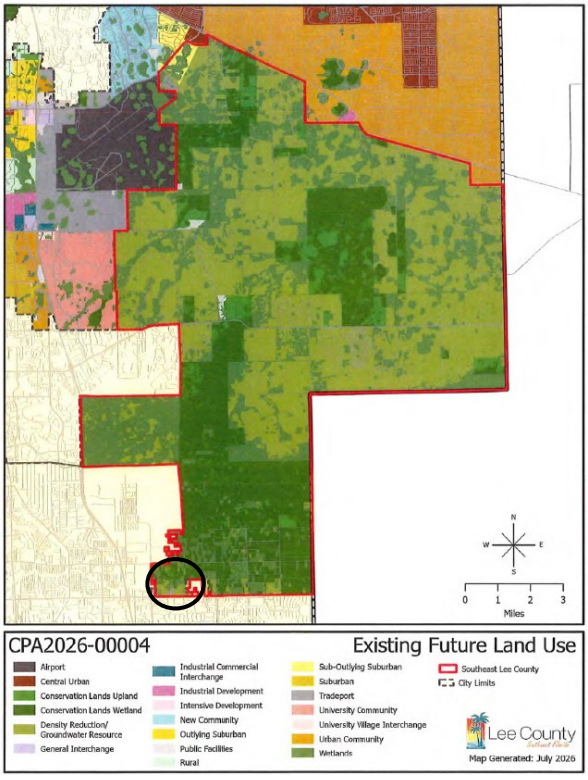


Figure 1. Existing Future Land Use Map

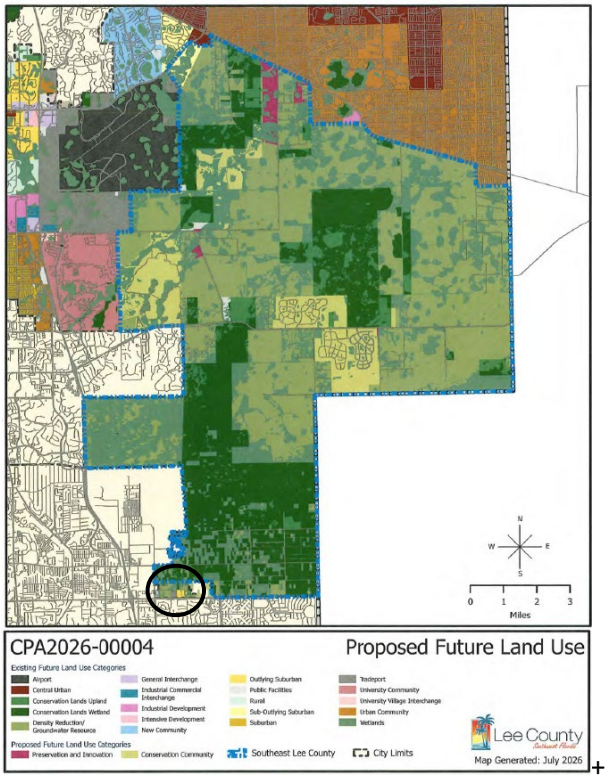


Figure 2. Proposed Future Land Use Map

In addition to the change in Future Land Use, the County-initiated amendment further removes the subject properties from the Southeast Lee County Community Plan area. Figures 3 and 4 depict the existing and proposed Community Plan change requested in CPA2026-00004.

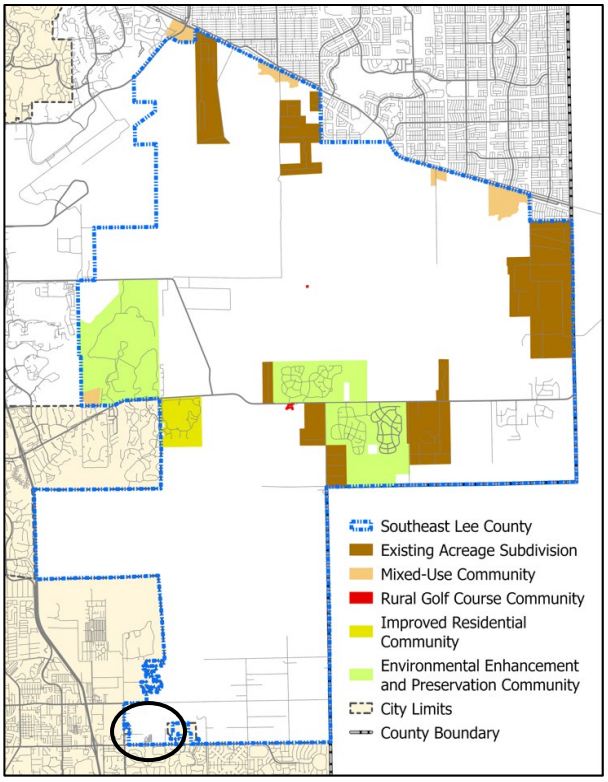


Figure 3. Existing Southeast Lee Map

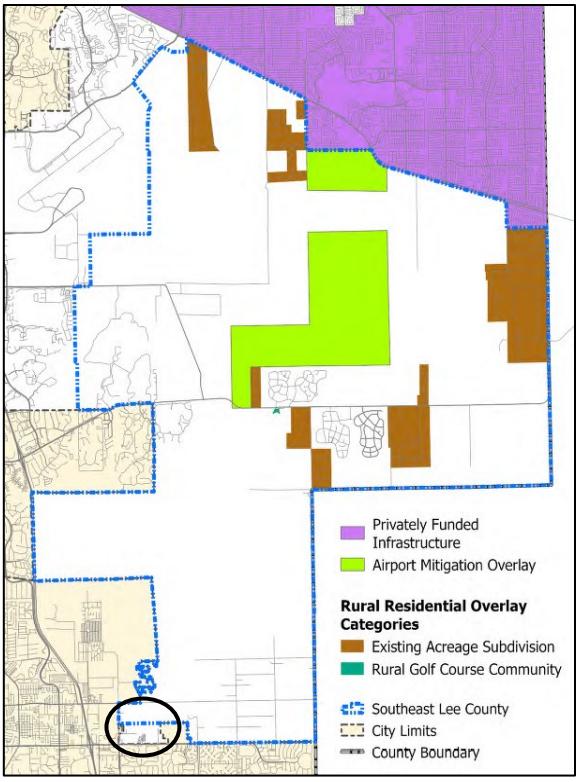


Figure 4. Proposed Southeast Lee Map

EXISTING CONDITIONS:

The subject properties are located off the county maintained, arterial road of Bonita Beach Road. The present site contains two (2) centrally located, rectangular (pre-1980) limestone mining pits totaling approximately 15 acres, or about 30 percent of the site. In addition to the excavations, legacy mining features such as disturbed land surfaces, drainage ditches, and several debris piles remain onsite and contribute to the site's altered hydrologic conditions.

Properties to the north and east of the subject parcels are zoned Agricultural (AG-2), and directly to the west the Sanctuary RV Resort, zoned RV-3. To the south across Bonita Beach Road is the Worthington Country Club Residential Planned Development (RPD), which is governed under the City of Bonita Springs jurisdiction.

The properties fall within the 5- and 10-year groundwater travel time zones, as depicted on the Wellfield Protection Zones Map (Lee Plan Map 4-C).

ANALYSIS:

LDC Section 34-145 establishes the review criteria for requests for rezone to a planned development. Before recommending approval, the Hearing Examiner must find the request:

a) Complies with the Lee Plan;
b) Meets the Land Development Code and other applicable County regulations or qualifies for deviations;

c) Is compatible with existing and planned uses in the surrounding area;
d) Will provide access sufficient to support the proposed development intensity;
e) The expected impact on transportation facilities will be addressed by existing County regulations and conditions of approval;
f) Will not adversely affect environmentally critical or sensitive areas and natural resources; and
g) Will be served by public services, defined in the Lee Plan, if located in a future urban area category.

For Planned Development rezoning requests, the Hearing Examiner must also find:

a) The proposed use or mix of uses is appropriate at the proposed location;
b) The recommended conditions provide sufficient safeguards to the public interest and are reasonably related to the impacts on the public's interest expected from the proposed development; and
c) That each requested deviation:
    1) Enhances the achievement of the objectives of the planned development; and
    2) Preserves and promotes the general intent of this Code to protect the public's health, safety and welfare.

The applicant has provided a request statement addressing the motive for the planned development and analysis of the decision-making criteria (Attachment F). The following sections provide staff's analysis of the request, as measured by the review criteria.

a. Lee Plan Compliance

The parcel is currently located in the Density Reduction/Groundwater Recharge (DR/GR) Future Land Use Category, described in **Policy 1.4.5** as properties including *"upland areas that provide substantial recharge to the aquifers most suitable for future wellfield development".* The current Comprehensive Plan Map Amendment request changes the subject property to Outlying Suburban Future Land Use Future Land Use Category, described by **Policy 1.1.6** of the Lee Plan, which is being used by staff to analyze the applicant's request. *"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 Outlying Suburban designation was applied to properties south of Bonita Beach Road in the 1990 Lee Plan and would likely have applied to the subject property as well, but for the density reductions implemented on the Future Land Use Map at that time. The property is no longer characteristically rural, as urban development is directly adjacent to the south and west. Development densities in the surrounding area are generally consistent with the Outlying Suburban land use category, and the infrastructure necessary to support development is already available. The proposed planned development proposes 94 residential units. The Outlying Suburban Future Land Use category would permit up to 102 units on the property's 34 upland acres. Accordingly, the proposed Comprehensive Plan amendment and rezoning request are consistent with the purpose and intent of the Outlying Suburban Future Land Use category. The property also includes the Wetlands Future Land Use category, described in **Policy 1.5.1** as *"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 wetlands are delineated in accordance with F.S. Section 373.019(27), and

the Unified Statewide Wetland Delineation Methodology. An ecological assessment prepared by Passarella determined that these wetlands are highly impacted, lack indigenous vegetation, and provide limited ecological and hydrological functions. Based on the assessment, mitigation of the affected wetland areas is expected to result in a net positive regional environmental and hydrologic benefit through the restoration, enhancement, or preservation of higher-functioning wetland resources. Staff finds the request consistent with **Policy 1.1.6 and Policy 1.5.1** of the Lee Plan.

Objective 2.1 of the Lee Plan promotes contiguous and compact growth to contain urban sprawl. The proposed RPD will allow a total of 94 single-family dwelling units. Upon adoption of the companion CPA, the property will be located within a future urban category, where the Lee Plan directs future residential development to occur. The proposed project is in a location where large-scale residential development is occurring or in place directly to the south and west and promotes contiguous development. **Objective 2.2** and **Policy 2.2.1** discuss new growth in future urban areas in proximity to available road networks and where adequate public facilities exist or are assured. The subject property has access to county-maintained arterial road Bonita Beach Road, within close proximity to Interstate 75 to the west. Lee County DOT provided a Traffic-Related Analysis (Attachment N), indicating all analyzed roadway links and intersections within the project area are projected to operate at or better than the adopted Level of Service standards for all evaluated horizon years with and without the project. The subject property has adequate services available to the site, including fire, police, EMS, and solid waste serving the property. Staff finds the request consistent with **Objective 2.1, Objective 2.2, and Policy 2.2.1** of the Lee Plan.

The applicant provided an in-depth analysis conducted by RESPEC (Attachment P) stating the groundwater modeling confirms that the proposed development's irrigation needs are minimal (0.5 feet) and will not threaten long-term potable water availability. Regional SFWMD groundwater modeling indicated the projected drawdowns were also minor (0.5 to 3 feet) and did not threaten long-term potable water availability. The Lower Tamiami Aquifer, protected by an overlying confining unit, is considered a sustainable source for this level of use. Furthermore, SFWMD modeling indicates that total regional withdrawals remain within safe limits, ensuring the project will not compromise aquifer recharge or future water security. 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, consistent with **Policy 2.3.1 and 2.3.2.**

The applicant provided a Letter of Availability from Bonita Springs Utilities (Attachment R) that stated that plant capacities are adequate for the potable water and sanitary sewer; however, the Developer will be required to install all off-site and on-site utility line extensions to provide service to the project. No reuse water is available in proximity to the site, and the applicant has indicated the proposed development is intending to use surface water from the stormwater management lakes within the community and groundwater withdrawals from the Lower Tamiami Aquifer as the primary irrigation source, fulfilling **Standards 4.1.1. and 4.1.2.** The applicant provided the required Protected Species Survey, and supporting environmental maps (Attachment J). The Protected Species Survey indicated there were two American alligators and one Alligator nest observed at the time of the survey, and no protected plant species were documented. Prior to the issuance of a Development Order, a Protected Species Management Plan will be submitted pursuant to LDC Section 10-474 outlining the protection measures for the documented species on site, fulfilling **Standard 4.1.4.** Staff finds the request is consistent with **Standards 4.1.1, 4.1.2, and 4.1.4** of the Lee Plan.

Goal 5 Residential Land Uses seeks is to accommodate residential development in appropriate locations to provide attractive and safe neighborhoods with a variety of price ranges and housing types. The properties lie along Bonita Beach Road, which has experienced a transformation with residential subdivisions to the south, and mobile home communities to the west. The proposed residential development is within the FIRM flood zone X and is not located in an evacuation zone, fulfilling the intent of **Policy 5.1.2** prohibiting residential development where physical constraints or hazards exist**.** The proposed is compatible with surrounding residential use, pursuant to **Policy 5.1.5,** which seeks to protect existing and future residential areas from encroaching uses that are potentially destructive to surrounding neighborhoods. Staff finds the request consistent with **Goal 5, and Policies 5.1.2 and 5.1.5** of the Lee Plan**.**

Goal 33 of the Lee Plan protects Southeast Lee County's natural resources through public and private acquisition and restoration efforts. The properties currently reside in the Southeast Lee County Community Plan Area, but as previously stated, the adoption of CPA2026-00004 will remove the parcels from the community plan area (Attachment U). The adoption of the requested map amendment further protects Southeast Lee County's natural resources fulfilling the intent of **Goal 33**. Staff finds the request consistent with Goal 33 of the Lee Plan.

Policy 60.1.1 requires design of surface water management systems to protect or enhance groundwater. Site control elevations were established using surrounding ERP-permitted surface water management systems and verified field data. Wet-season groundwater elevations were confirmed through site-specific field observations conducted by the project ecologist. The proposed stormwater management system is designed to maintain control elevations consistent with documented wet-season groundwater conditions and to protect groundwater resources. The system also incorporates required nutrient-reduction measures to improve water quality prior to discharge to the Imperial River watershed. Based on the submitted information, the proposed stormwater management system is consistent with applicable SFWMD and FDEP stormwater design criteria, consistent with **Policy 60.1.1.** Staff finds the request is consistent with **Policy 60.1.1** of the Lee Plan.

Goal 61 of the Lee Plan is to provide sufficient performance and/or design standards for development protective of the function of natural drainage systems. The applicant provided stormwater narrative (Attachment O), indicated the site includes two man-made lakes that currently serve as water storage areas. The northern portion of the site conveys runoff into the existing lakes that discharge through a pipe system connected to a shallow swale where it then flows across the property towards the Kehl Canal, and onto the Imperial River. The southern portion of the property sheet flows towards existing roadside ditches along Bonita Beach Road, which also conveys to the Kehl Canal before reaching the Imperial River. The proposed stormwater management will mimic the existing conditions and implement Best Management Practices (BMPs) to ensure compliance with regulatory requirements through SFWMD and FDEP. The Natural Resources staff report (Attachment Q) stated reuse water is not currently available to meet the needs of the proposed development, and as previously stated the groundwater modeling confirms that the proposed development's irrigation needs are minimal and will not threaten long-term potable water availability. Projected drawdowns are minor (0.5 to 3 feet), and the Lower Tamiami Aquifer, protected by an overlying confining unit, is considered a sustainable source for this level of use. Additionally, the applicant will be required to obtain a Water Use permit from the SFWMD, and Natural Resources staff have conditioned the irrigation systems to be designed as outlined in the Characterization and Surface Water Resources Report (Attachment P), covered later in this staff report, consistent with **Policy 61.1.6.** As previously stated, the proposed stormwater management will mimic the existing conditions and implement Best Management Practices (BMPs) to ensure compliance with

regulatory requirements through SFWMD and FDEP, fulfilling the intent of **Objective 61.2** that supports a surface water management system strategy that relies on natural features and systems to manage storm and surface water. Staff finds the request is consistent with **Goal 61, and Policy 61.1.6 and Objective 61.2** of the Lee Plan.

The project is southwest of Bonita Springs Utilities' production wells and falls within the 5- and 10-year groundwater travel time zones for these wellfields depicted on Lee Plan Map 1-H. The proposed development must comply with the Lee County Wellfield Protection Ordinance prior to issuance of local development order. Lee County Natural Resources staff reviewed the request consistent with **Lee Plan Policies 63.1.2 and 63.1.3**. The applicant provided ground and surface water analysis provided by RESPEC (Attachment P) stated the stormwater management systems are designed to meet or exceed Lee County LDC and SFWMD water quality treatment standards. Staff finds the request consistent with **Policies 63.1.2 and 63.1.3**.

Policy 123.2.10 requires that development adjacent to aquatic and other nature preserves, wildlife refuges, and recreation areas be designed to protect the natural character and public investment. The applicant indicated a small portion of the northern property line is adjacent to a state preserve, and to the north and east of the subject properties lies the Southern CREW Restoration project. As previously stated, the engineered stormwater management system is designed to mimic the natural flow patterns, preventing any adverse effects to natural systems. Staff finds the request consistent with **Policy 123.2.10** of the Lee Plan.

The County's wetlands protection regulations are established by **Policy 124.1.2** of the Lee Plan. The applicant provided a Jurisdictional Wetland Delineation (Attachment V) from the South Florida Water Management District stating the wetlands on site were disturbed and had varying degrees of exotic vegetation and have been identified as very low quality to the extent that mitigation offsite provides a greater environmental benefit. The mitigation property is located just to the north of the subject properties in the Southern CREW area, an area targeted for land acquisition for additional hydrologic restoration activities, consistent with **Policy 124.1.2.**

Goal 125: Water Quality is to ensure that water quality is maintained or improved for the protection of the environment and people of Lee County. The applicant proposed a Surface Water Quality Monitoring Plan, consistent with **Policy 125.1.2 and 125.1.4.** Natural Resources staff recommended conditions to ensure consistency with these policies, covered later in this report. Staff finds the request consistent with **Goal 125 and Policy 125.1.2 and Policy 125.1.4.**

b. Meets this Code and other applicable County regulations or qualifies for deviations;

The applicant has acknowledged that at the time of development, Land Development Code and other applicable county regulations will be required and considered.

The applicant has requested and justified the following two (2) deviations for the request (Attachment I):

Deviation 1 seeks relief from LDC Section 10-291(3), which requires residential development of more than five acres to provide more than one means of ingress or egress for the development, to allow one primary access and one emergency access point. The project's primary access point is strategically located at a full

median opening on Bonita Beach Road to ensure safe and efficient ingress and egress. Due to intersection spacing requirements and the presence of existing median openings, any secondary access would be restricted to right-in/right-out movements, creating operational inefficiencies and potential safety concerns.

Staff recommends **approval** of the deviation, with the following condition:

Prior to Development Order approval, pursuant to LDC Section 10-291(3)(a)4, a notice to all future property owners must be recorded by the developer in the public records. The notice must articulate the emergency access plan and provide information as to where a copy of this plan may be obtained from the developer or the developer's successor.

Deviation 2 seeks relief from LDC Section 10-285, which requires motor vehicle connections to a road from privately maintained streets, access roads or accessways to be separated in accordance with the minimum standards of 440 feet, to allow for a 260-foot separation from the emergency access point to Faygin Lane. Bonita Beach Road is a county-maintained arterial road, and upon the companion CPA approval, the property will reside within the Outlying Suburban Future Land Use category, a future urban area. The site's geometry and adjacent public intersections limit available frontage, making compliance impractical. The proposed emergency-only access is positioned at the most viable location to minimize potential conflicts and will be restricted to non-daily use in accordance with FDOT Access Management principles. Lee County Public Safety indicated they have no objection to the deviation so long as the emergency access gate is electric and compatible with the existing Emergency Vehicle Access Control (EVAC) system. LDC Section 34-1748(b) establishes the parameters for gates, requiring they become equipped with an override mechanism acceptable to the local emergency services agencies.

Staff recommends **approval** of the deviation.

Is compatible with existing and planned uses in the surrounding area;

The properties lie along Bonita Beach Road that has experienced a transformation with residential subdivisions to the south, and mobile home communities to the west, all similar in character and density. All uses, as conditioned, are compatible with the surrounding area.

c. *Will provide access sufficient to support the proposed development intensity;*

The proposed development has direct access to the 4-lane, arterial road of Bonita Beach Road, and the applicant has requested a deviation allowing only one means of ingress/egress and one emergency-only access, which provides sufficient access to the development.

d. *The expected impacts on transportation facilities will be addressed by existing County regulations and conditions of approval;*

The applicant provided a Traffic Impact Statement (Attachment M) indicating the Level of Service analysis concluded there is sufficient capacity available to accommodate for new trips that will be generated by the proposed development, and no roadway improvements will be warranted as a result of the additional traffic generated by the request. Lee County DOT provided a Transportation-Related Analysis (Attachment

N), indicating all analyzed roadway links and intersections within the project area are projected to operate at or better than the adopted Level of Service standards for all evaluated horizon years with and without the project. LDOT staff further indicated that the project is subject to a proportionate share contribution toward signalized access at the full median opening opposite Southhampton Drive, should warrants be met, and proposed the following condition:

Concurrently with the submittal of the first Development Order (DO) application, the developer must submit a comprehensive traffic signal warrant analysis to the Lee County Department of Transportation (LDOT) for the project's access point on Bonita Beach Road to determine if traffic signal warrants are or will be met. This analysis must evaluate the full build-out conditions of both the proposed development and the existing development on the south side of Bonita Beach Road. If warrants are met, the developer will be required to enter into a proportionate-share agreement with Lee County and contribute its proportionate-share mitigation funding toward the design and installation of a signalized access point at the full median opening opposite Southampton Drive.

e. Will not adversely affect environmentally critical or sensitive areas and natural resources:

The applicant stated the properties historically have been mined and previously cleared of vegetation but are currently infested with exotic vegetation with limited areas of wetlands onsite or indigenous vegetation.

As previously noted, the applicant provided an in-depth analysis conducted by RESPEC (Attachment P) stating the groundwater modeling confirms that the proposed development's irrigation needs are minimal and will not threaten long-term potable water availability. Projected drawdowns are minor (0.5 to 3 feet), and the Lower Tamiami Aquifer, protected by an overlying confining unit, is considered a sustainable source for this level of use. Furthermore, SFWMD modeling indicates that total regional withdrawals remain within safe limits, ensuring the project will not compromise aquifer recharge or future water security. 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. Natural Resources staff indicated the applicant would be required to obtain a Water Use permit from SFWMD and proposed the following condition:

Prior to local development order approval, the development order plans must demonstrate that irrigation will be provided via a master-controlled central irrigation system. The master-controlled system must be designed to comply with the Water Conservation Ordinance #24-01, as amended. The Property Owner Association documents, including Declarations and Covenants (submitted prior to Development Order approval and recorded prior to issuance of Certificate of Compliance), must prohibit the installation of single-family use wells for potable or irrigation water.

The project is southwest of Bonita Springs Utilities' production wells and falls within the 5- and 10-year groundwater travel time zones as depicted on the Wellfield Protection Zone Map (Lee Plan Map 4-D). The proposed development must comply with the Lee County Wellfield Protection Ordinance prior to issuance of local development order. To ensure consistency, Natural Resources staff proposed the following conditions:

Prior to local development order approval, the developer must provide the Surface Water Quality Monitoring Plan, found within the attached Characterization of Ground and Surface Water Resources Report, with the following modifications:

- ***Surface water quality monitoring location(s) must be finalized and identified at each proposed outfall.***

As previously mentioned, the applicant provided the required Protected Species Survey and associated environmental maps (Attachment J). The Protected Species Survey indicated there were two American alligators and one Alligator nest observed at the time of the survey, and no protected plant species were documented. Prior to the issuance of a Development Order, a Protected Species Management Plan will be submitted pursuant to LDC Section 10-474 outlining the protection measures for the documented species on site.

County environmental staff provided a report analyzing the request (Attachment K), and made the following findings:

Open Space
Property development regulations for residential zoning districts do not require open space for a single-family lot with a minimum size of 6,500 square feet and do not require indigenous open space per LDC Section 10-415.

Buffers
Residentially zoned properties are required to only provide buffering when the subject property is abutting a public preserve pursuant to LDC Section 10-416(d)(3) and 10-416(d)(4).

f. Will be served by urban services, defined in the Lee Plan, if located in a Future Urban area category.

The parcel is located in an area surrounded by urban development. The following services are available to accommodate the request:

Utilities
The applicant provided a Letter of Availability from Bonita Springs Utilities (Attachment R) that stated that plant capacities are adequate for the potable water and sanitary sewer; however, the Developer will be required to install all off-site and on-site utility line extensions to provide service to the project.

Fire and EMS
Bonita Springs Fire District, located at 27701 Bonita Grande Drive is approximately 1.0 mile away.

Sheriff
Lee County Sheriff's 4th Precinct Substation is located at 8350 Hospital Drive, approximately 9 miles away.

Bonita Springs Utilities
The property is within Bonita Springs Utilities service area.

Public Schools

The property is within the Lee County School District South Zone. The School District of Lee County stated they have no objection to the proposed development as the requested density will have no impact on school capacity in the area (Attachment T).

Planned Development Findings and Conclusion:

Staff has reviewed the request and finds:

a) *The proposed use or mix of uses is appropriate at the proposed location;*

The properties are located within an established residential area. The request demonstrates consistency with surrounding uses and rezone to RPD provides additional safeguards for density and development challenges. All uses, as conditioned, are compatible with the surrounding area.

b) *The recommended conditions provide sufficient safeguards to the public interest and are reasonably related to the impacts on the public's interest expected from the proposed development; and*

The recommended conditions provide sufficient safeguards to the public interest and relate to the impact the request will have on the surrounding land uses. Groundwater and wellfield protection is safeguarded by master-controlled central irrigation systems, designed to comply with the Water Conservation Ordinance #24-01, and a Surface Water Quality Monitoring Plan must be finalized at each proposed outfall.

c) *That each requested deviation:*
    1) *Enhances the achievement of the objectives of the planned development; and*
    2) *Preserves and promotes the general intent of this Code to protect the public health, safety and welfare.*

The applicant has requested two (2) deviations from Land Development Code (LDC) requirements, (Attachment I).

Staff recommends **approval** of the deviations.

CONCLUSION

The requested rezone of approximately 47+/- acres from Agricultural (AG-2) to Residential Planned Development (RPD) to allow a maximum of 94 single-family dwelling units is consistent with the Lee Plan and Land Development Code as conditioned. The proposed request is consistent with the surrounding residential development within the Outlying Suburban Future Land Use category as established by Lee Plan. Staff has concluded that the request, as conditioned, will not result in negative impacts to urban services, infrastructure, or surrounding property. The subject property is sufficiently served by urban services. The request will not adversely affect environmentally critical or sensitive areas on natural resources. The request allows for new residential uses in an appropriate location and establishes sufficient safeguards for the public interest. Therefore, staff recommends **APPROVAL** of the applicant's request, as conditioned in Attachment C.

ATTACHMENTS

Attachment A – Lee County Expert Witness Information
Attachment B – Case Maps
Attachment C – Conditions and Deviations
Attachment D – Legal Description
Attachment E – Master Concept Plan
Attachment F – Applicant's Narrative
Attachment G – Applicant's Schedule of Uses
Attachment H – Applicant's Property Development Regulations
Attachment I – Applicant's Deviations and Justifications
Attachment J - Protected Species Survey and Environmental Maps
Attachment K - Environmental Staff Report
Attachment L – Archaeological Sensitivity
Attachment M – Traffic Impact Statement
Attachment N – LCDOT Transportation-Related Analysis
Attachment O – Storm Water Management Narrative
Attachment P – RESPEC Surface Water and Groundwater Analysis
Attachment Q – Natural Resources Staff Report
Attachment R –Bonita Springs Utilities Letter of Availability
Attachment S – Letter of No Objection
Attachment T – Lee County School Board Analysis
Attachment U – CPA2026-00004 BOCC Transmittal Packet 8/19/2026
Attachment V – Jurisdictional Wetland Delineation
Attachment W – Resolution Z-74-227

Attachment A

LEE COUNTY STAFF EXPERT WITNESS INFORMATION
PROVIDED PURSUANT TO AC-2-6, SECTION 2.2.b(5)(F)3.

Case Number: **DCI2025-00028**
Project Name: **White Willow RPD**
Hearing Examiner Date: **October 15, 2026**

MarySue Groth, Senior Planner, Zoning, 1500 Monroe Street, Fort Myers, FL 33901

- Previously qualified as an expert witness by the Lee County Hearing Examiner. Current resume is on file with the Hearing Examiner.
- Seeking to be qualified as an expert witness in the Lee County Land Development Code, Lee Plan, and Environmental Sciences.
- Report and documents are submitted with the Staff Report for this case. Additional documents that may be relied upon and used as evidence during the hearing include: the Lee County Land Development Code, the Lee Plan, and documentation submitted by the applicant as part of the subject application.

Katherine Burgess, AICP, Principal Planner, Planning, 1500 Monroe Street, Fort Myers, FL 33901

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Ally Hall, P.E., Plan Reviewer, Development Services, 1500 Monroe Street, Fort Myers, FL 33901

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Nic DeFilippo, Senior Environmental Planner, Planning, 1500 Monroe Street, Fort Myers, FL 33901

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William Lange, Environmental Planner, Planning, 1500 Monroe Street, Fort Myers, FL 33901

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Jillian Scholler, Deputy Director Transportation, Planning, 1500 Monroe Street, Fort Myers, FL 33901

- Previously qualified as an expert witness by the Lee County Hearing Examiner. Current resume is on file with the Hearing Examiner.
- Seeking to be qualified as an expert witness in the Lee County Land Development Code, Lee Plan, and Transportation.
- Report and documents are submitted with the Staff Report for this case. Additional documents that may be relied upon and used as evidence during the hearing include: the Lee County Land Development Code, the Lee Plan, and documentation submitted by the applicant as part of the subject application.

John Podczerwinsky, Principal Transportation Planner, 1500 Monroe Street, Fort Myers, FL 33901

- Previously qualified as an expert witness by the Lee County Hearing Examiner. Current resume is on file with the Hearing Examiner.
- Seeking to be qualified as an expert witness in the Lee County Land Development Code, Lee Plan, and Transportation.
- Report and documents are submitted with the Staff Report for this case. Additional documents that may be relied upon and used as evidence during the hearing include: the Lee County Land Development Code, the Lee Plan, and documentation submitted by the applicant as part of the subject application.

DCI2025-00028

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US Feet

ATTACHMENT B

ST

BONITA BEACH RD SE

City of
Bonita
Springs

I-75

BONITA GRANDE DR

DCI2025-00028

Aerial



Subject Property

City Limits

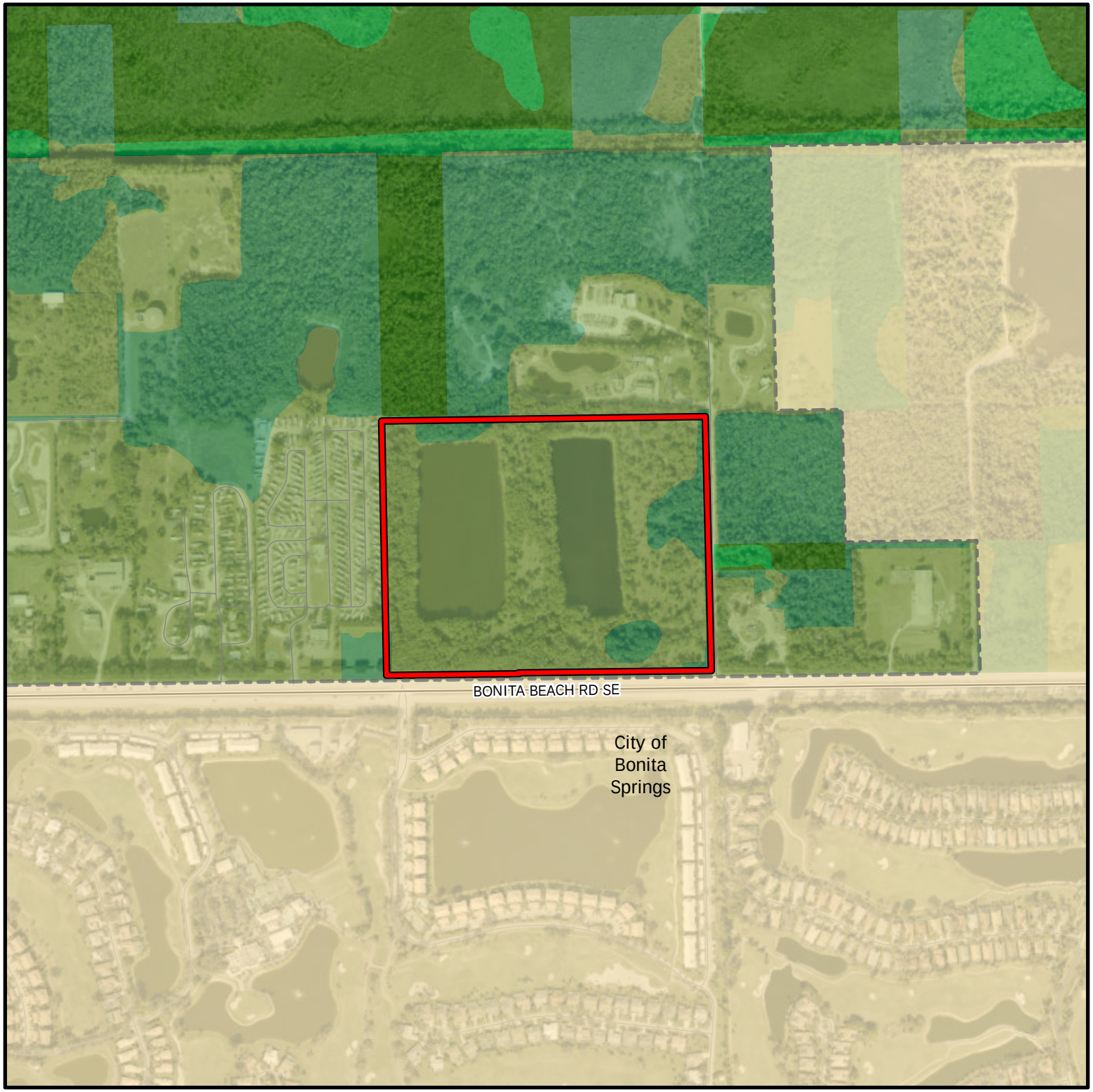
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Lee County
Southwest Florida

DCI2025-00028

Future Land Use

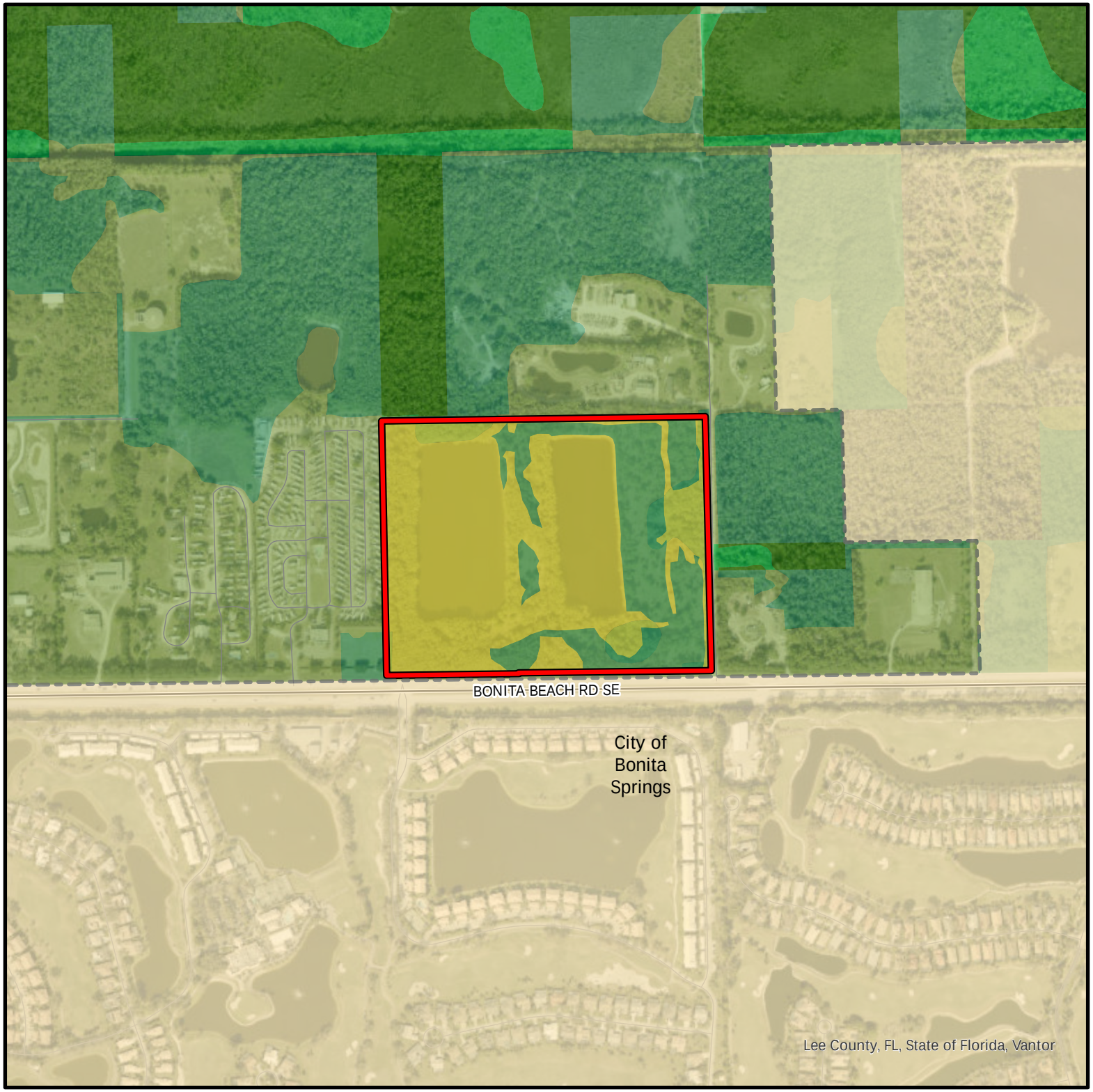


- Subject Property
- Density Reduction/Groundwater Resource
- Conservation Lands - Upland
- Wetlands
- Conservation Lands - Wetland
- City Limits

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Lee County
Southwest Florida



DCI2025-00028

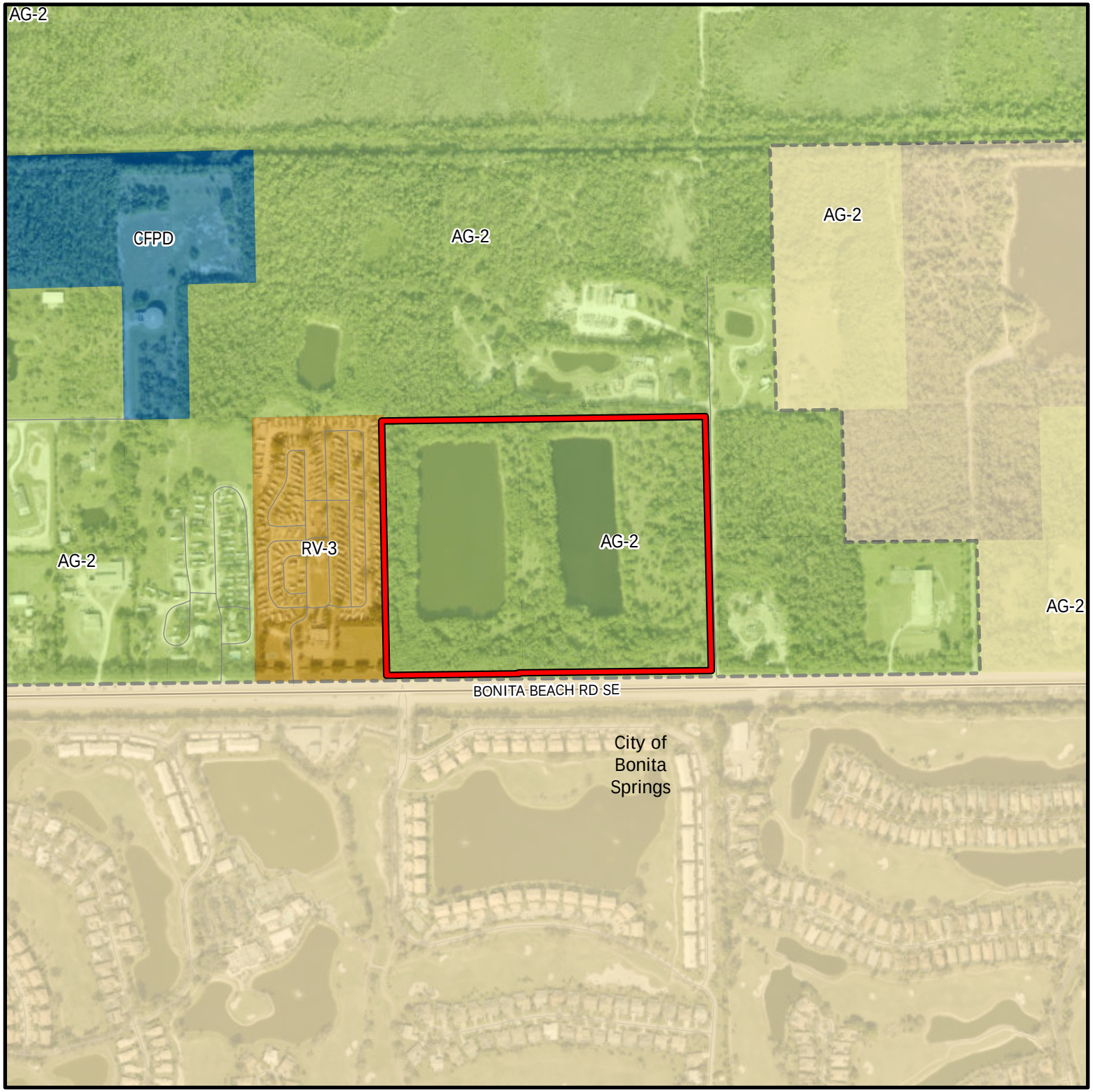
Proposed Future Land Use

- Subject Property
- Outlying Suburban
- Density Reduction Groundwater \ Resource
- Conservation Lands - Upland
- Wetlands
- Conservation Lands - Wetland
- City Limits

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Lee County
Southwest Florida



DCI2025-00028

Zoning

Subject Property

City Limits

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Lee County
Southwest Florida

ATTACHMENT C

White Willow RPD – DCI2025-00028

Attachment C – Conditions and Deviations

CONDITIONS

All references to uses are defined or listed in the Lee County Land Development Code (LDC).

1. Master Concept Plan/Development Parameters

   MCP. Development must be consistent with the one-page Master Concept Plan entitled "White Willow Master Concept Plan" (Attachment E), except as modified by the conditions below.

   Land Development Code and Lee Plan. Development must comply with the LDC and Lee Plan at time of development order approval, except as may be granted by deviation herein. Subsequent changes may require additional zoning approval.

   Effectiveness of Approval. This rezoning approval is contingent upon the adoption of CPA2026-00004.

   Development Parameters. Development within the RPD is limited to a maximum of 94 single-family dwelling units.

2. Uses and Site Development Regulations
   a. Schedule of Uses:

      Accessory Uses and Structures
      Administrative Offices
      Dwelling unit: Single-Family
      Entrance gates and gatehouses
      Essential services
      Essential service facilities, Group I
      Excavation, Water retention
      Fences, walls
      Home Occupation
      Model Home, model unit
      Parking lot: Accessory only
      Real Estate Sales Office
      Recreational Facilities: Personal, Private, On-Site
      Signs

   b. Property Development Regulations:

      Minimum Area Dimensions

Lot Size	6,500 square feet
Lot Depth	100 feet
Lot Width	60 feet

      Minimum Setbacks

Street	20 feet
Rear (Principal/Accessory)	15 feet/5 feet
Side	5 feet
Waterbody	20 feet
Minimum Building Separation	10 feet
Maximum Lot Coverage	50 percent
Maximum Building Height	35 feet

3. Natural Resources

   a. Prior to local development order approval, the development order plans must demonstrate that irrigation will be provided via a master-controlled central irrigation system. The master-controlled system must be designed to comply with the Water Conservation Ordinance #24-01, as amended. The Property Owners' Association documents, including Declarations and Covenants (submitted prior to Development Order approval and recorded prior to issuance of Certificate of Compliance), must prohibit the installation of single-family use wells for potable or irrigation water.

   b. Prior to local development order approval, the developer must provide the Surface Water Quality Monitoring Plan, found within the Characterization of Ground and Surface Water Resources Report (Attachment P), with the following modifications:

      Surface water quality monitoring location(s) must be finalized and identified at each proposed outfall.

4. Transportation

   a. Concurrently with the submittal of the first Development Order (DO) application, the developer must submit a comprehensive traffic signal warrant analysis to the Lee County Department of Transportation (LDOT) for the project's access point on Bonita Beach Road to determine if traffic signal warrants are or will be met. This analysis must evaluate the full build-out conditions of both the proposed development and the existing development on the south side of Bonita Beach Road. If warrants are met, the developer will be required to enter into a proportionate-share agreement with Lee County and contribute its proportionate-share mitigation funding toward the design and installation of a signalized access point at the full median opening opposite Southampton Drive.

DEVIATIONS

1. Ingress/Egress: Deviation 1 seeks relief from LDC Section 10-291(3) which requires residential development of more than five acres must provide more than one means of ingress or egress for the development, to allow one primary access and one emergency access point.

   The deviation is **approved** with the following condition:

   Prior to Development Order approval, pursuant to LDC Section 10-291(3)(a)4, a notice to all future property owners must be recorded by the developer in the public records. The notice must articulate the emergency access plan and provide information as to where a copy of this plan may be obtained from the developer or the developer's successor.

2. Connection Separation: Deviation 2 seeks relief from LDC Section 10-285, which requires motor vehicle connections to a road from privately maintained streets, access roads or accessways must be separated in accordance with the minimum standards of 440 feet, to allow for a 260-foot separation from the emergency access point to Faygin Lane.

   This deviation is **approved.**

ATTACHMENT D

Barraco and Associates, Inc.
www.barraco.net
Civil Engineers, Land Surveyors and Planners

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.

Bearings hereinabove mentioned are State Plane for the Florida West Zone (NAD1983)(NSRS 2011) and are based on the South line of the Southeast Quarter (SE 1/4) of said Section 32 to bear N89°18'48"E.

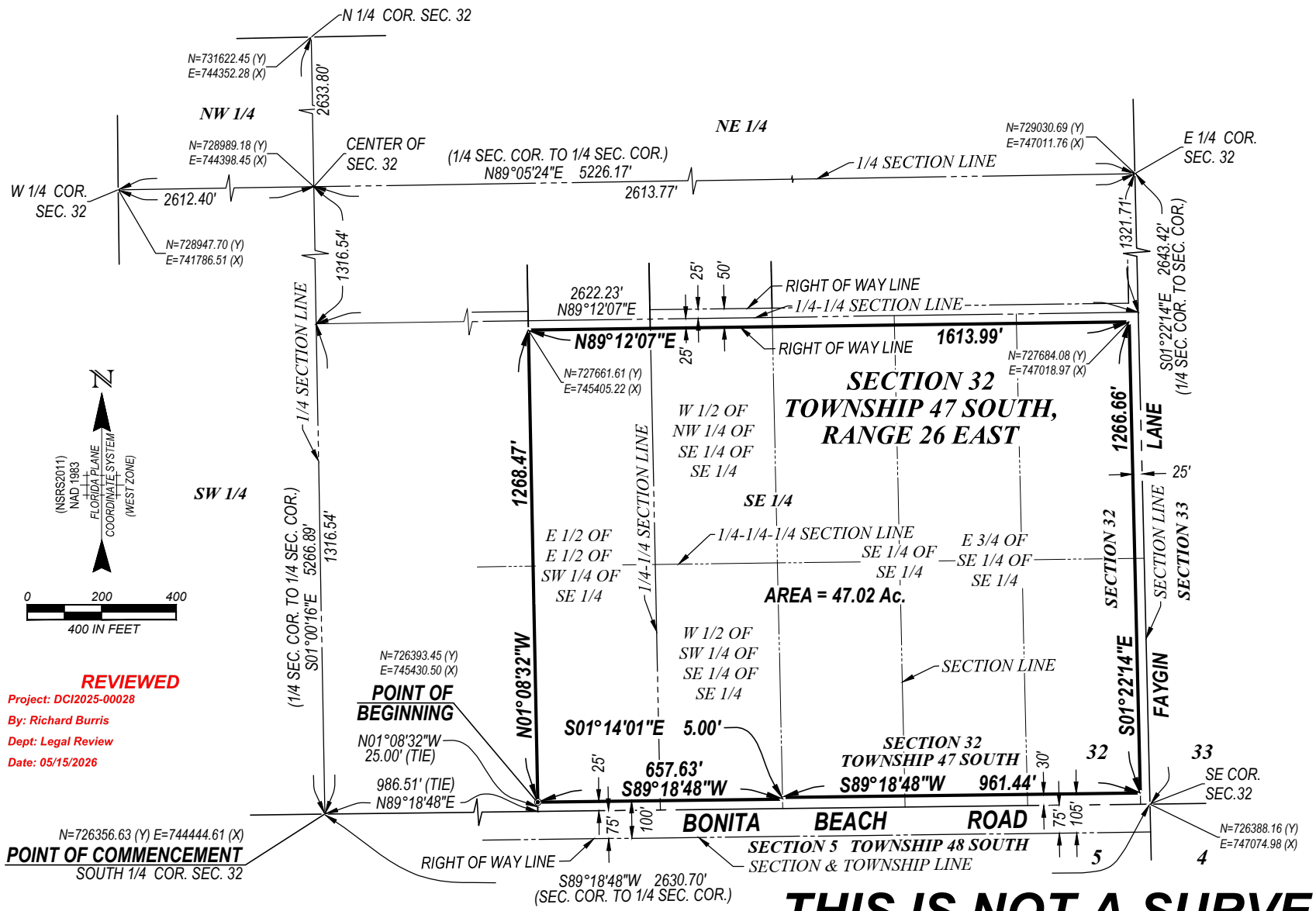
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Scott A Wheeler
Date: 2026.01.30
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SCOTT A. WHEELER ★ LICENSE NUMBER 5949 ★ STATE OF FLORIDA ★ PROFESSIONAL SURVEYOR AND MAPPER

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

L:\24350 - Bonita Beach 50\Survey\Descriptions\Survey\24350S02.doc

REVIEWED
Project: DCI2025-00028
By: Richard Burris
Dept: Legal Review
Date: 05/15/2026



REVIEWED
Project: DCI2025-00028
By: Richard Burris
Dept: Legal Review
Date: 05/15/2026

THIS IS NOT A SURVEY

Digitally signed by Scott A Wheeler
Date: 2026.01.30 '10:36:13 -05'00'

SCOTT A. WHEELER (FOR THE FIRM - LB-6940)
PROFESSIONAL SURVEYOR AND MAPPER
FLORIDA CERTIFICATE NO. 5949

DATE SIGNED:

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

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. INST. No.- DENOTES INSTRUMENT NUMBER, LEE COUNTY PUBLIC RECORDS.
3. O.R. - DENOTES OFFICIAL RECORD BOOK, LEE COUNTY PUBLIC RECORDS.
4. BEARINGS AND COORDINATES SHOWN ARE STATE PLANE FLORIDA WEST ZONE (NAD1983)(NSRS 2011) AND ARE BASED ON THE SOUTH LINE OF THE SOUTHEAST QUARTER (SE 1/4) OF SECTION 32 TO BEAR N89°18'48"E.
5. DESCRIPTION IS ATTACHED.

Barraco and Associates, Inc.
CIVIL ENGINEERING - LAND SURVEYING
LAND PLANNING
www.barraco.net
2271 McGREGOR BLVD., SUITE 100
POST OFFICE DRAWER 2800
FORT MYERS, FLORIDA 33902-2800
PHONE (239) 461-3170
FORT MYERS | PANAMA CITY BEACH
FLORIDA CERTIFICATES OF AUTHORIZATION
ENGINEERING 7995 - SURVEYING LB-6940

PREPARED FOR

PULTE HOME CORPORATION
24311 WALDEN CENTER DRIVE
SUITE 300
BONITA SPRINGS, FLORIDA 34134

PHONE (239) 498-7711
FAX (239) 498-7707

WWW.PULTEHOMES.COM

PROJECT DESCRIPTION

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

PROJECT SURVEYOR

SCOTT A. WHEELER LICENSE NUMBER 5949 STATE OF FLORIDA PROFESSIONAL SURVEYOR AND MAPPER

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

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LAYOUT	2
LOCATION	J:\24350\DWG\SURVEYING\SKETCH\
PLOT DATE	THU. 1-29-2026 - 4:02 PM
PLOT BY	PETER OLSEN

DRAWING DATA

SURVEY DATE	01-29-2026
DRAWN BY	P. OLSEN
CHECKED BY	SAW
400	1"=60'
FIELD BOOK	

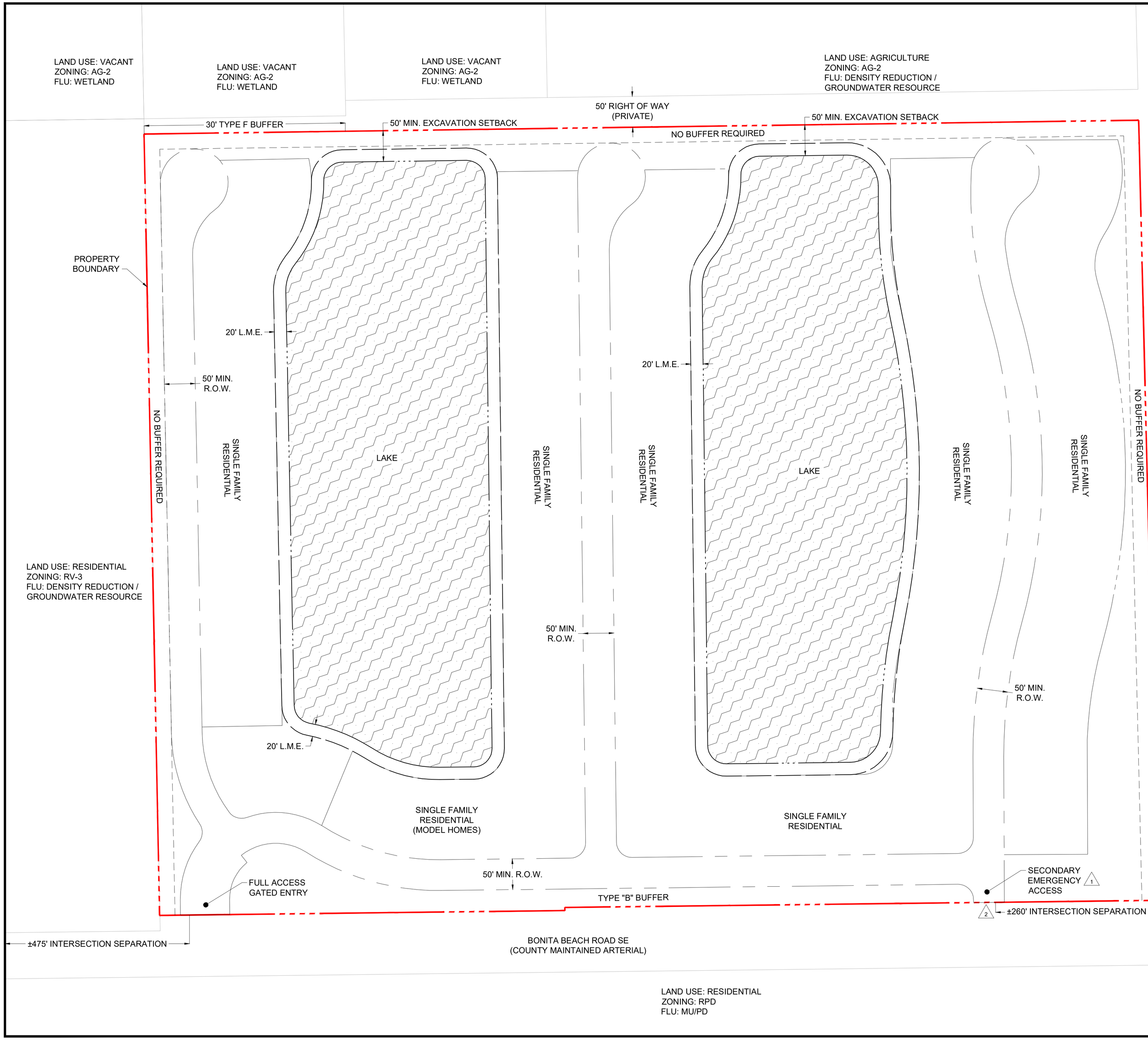
PLAN REVISIONS

STRAP NUMBERS

SKETCH TO ACCOMPANY DESCRIPTION

PROJECT / FILE NO.	SHEET NUMBER
24350 32-47-26	2 OF 2

Attachment E



LAND USE:

RESIDENTIAL:	18.10 AC
LAKE:	13.54 AC
ROADWAY:	6.07 AC
COMMON OPEN SPACE:	9.31 AC
TOTAL PROJECT AREA:	47.02 AC

OPEN SPACE:
ALL LOTS ARE OVER 6,500 SF (LDC SEC. 10-415(a))

LEGEND:

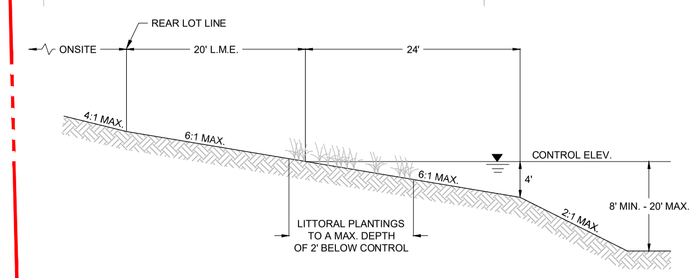
LAKE

DEVIATION

N W E S

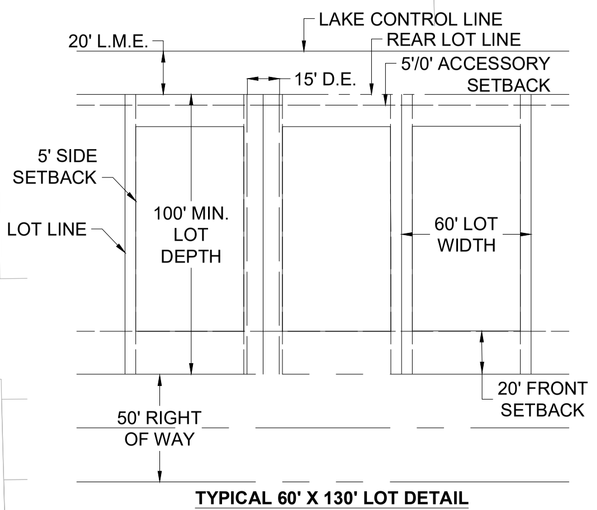
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SCALE IN FEET



TYPICAL LAKE SECTION

NOT TO SCALE



TYPICAL 60' X 130' LOT DETAIL

Barraco and Associates, Inc.
CIVIL ENGINEERING - LAND SURVEYING
LAND PLANNING
www.barraco.net
2271 McGREGOR BLVD., SUITE 100
FORT MYERS, FLORIDA 33901
PHONE (239) 461-3170
OFFICE LOCATIONS:
FORT MYERS | PANAMA CITY BEACH
FLORIDA BUSINESS REGISTRATIONS
ENGINEERING 7995 - SURVEYING LB-6940

PREPARED FOR

Pulte Homes

PULTE HOME CORPORATION
24311 WALDEN CENTER DRIVE
SUITE 300
BONITA SPRINGS, FLORIDA 34134

PHONE (239) 498-7711
FAX (239) 498-7707

WWW.PULTEHOMES.COM

PROJECT DESCRIPTION

WHITE WILLOW

PART OF SECTION 32,
TOWNSHIP 47 SOUTH, RANGE 26 EAST
LEE COUNTY, FLORIDA

THIS PLAN IS PRELIMINARY AND INTENDED FOR CONCEPTUAL PLANNING PURPOSES ONLY.

SITE LAYOUT AND LAND USE INTENSITIES OR DENSITIES MAY CHANGE SIGNIFICANTLY BASED UPON SURVEY, ENGINEERING, ENVIRONMENTAL AND / OR REGULATORY CONSTRAINTS AND / OR OPPORTUNITIES.

DRAWING NOT VALID WITHOUT SEAL, SIGNATURE AND DATE
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REPRODUCTION, CHANGES OR ASSIGNMENTS ARE PROHIBITED

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LOCATION	J:\24350\DWG\ZONING\
PLOT DATE	TUE. 9-8-2026 - 9:59 AM
PLOT BY	ALYSSA FONTAINE

CROSS REFERENCED DRAWINGS

PLAN REVISIONS

PLAN STATUS

MASTER CONCEPT PLAN

PROJECT / FILE NO.	SHEET NUMBER
22254	1.0

ATTACHMENT F

DELISI
Land Use Planning & Water Policy

WHITE WILLOW RPD
REQUEST STATEMENT
REVISED 2-20-2026

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.

The proposed application is to rezone the subject property from AG-2 (Agriculture) to RPD (Residential Planned Development) in order to develop a residential community consisting of 94 single family units. The subject property is ideally located along a residential corridor in close proximity commercial and recreational uses and with urban infrastructure available to serve the development.

Adjacent 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 was recently approved in the City of Bonita Springs, requesting 299 residential units and 100,000 square feet of commercial.

Planned Development Approval Criteria

As detailed in Section 34-145(d)(4)a. 1 and 2. of the Land Development Code, the attached application demonstrates the following:

(a) Consistency with the Lee Plan

The subject property is located in the Southeast Lee County Planning Community in Lee County, Florida. The RPD is being proposed concurrent with an amendment to the future land use map to change the property from Density Reduction/Groundwater Resources to Outlying Suburban. The proposed RPD is appropriate given the location of the development, the proposed density and the surrounding land uses. A detailed overview of compliance with the comprehensive plan is 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 Bech 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.

OJECTIVE 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 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.

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 l/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 in 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 l0-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 124.1.2:*** *The County's wetlands protection regulations will be consistent with the following:*
>
> *1. The County will not undertake an independent review at the development order stage of the impacts to wetlands resulting from development in wetlands that is specifically authorized by a DEP or SFWMD dredge and fill permit or exemption.*
>
> *2. No development in wetlands regulated by the State of Florida may be commenced without the appropriate state agency permit or authorization. Development orders and development permits authorizing development within wetlands or lands located within the Wetlands future land use category may be issued subject to a condition that construction may not commence until issuance of the required state permits.*
>
> *3. Lee County will incorporate the terms and conditions of state permits into County permits and will prosecute violations of state regulations and permit conditions through its code enforcement procedures.*
>
> *4. Every reasonable effort will be required to avoid or minimize adverse impacts on wetlands through the clustering of development and other site planning techniques. On- or off-site mitigation will only be permitted in accordance with applicable state standards.*
>
> *5. Mitigation banks and the issuance and use of mitigation bank credits will be permitted to the extent authorized by applicable state agencies.*
>
> *6. The density on wetlands that have been impacted, or will be impacted, in accordance with a state agency permit will be calculated at a density of one dwelling unit per 20 acres. Non-residential uses on wetlands that have been impacted, or will be impacted, in accordance with a state agency permit must be consistent with the non-residential uses permitted in the immediately adjacent, least intense, upland future land use category.*

The proposed development is currently under review by the SFWMD and a formal jurisdictional determination of the wetland lines will be forwarded once issued. The wetlands that have been identified on site are of very low quality to the extent that mitigation offsite provides a greater environmental benefit. The mitigation property is located just to the north of the subject property in the Southern CREW area, a location that both the County and the SFWMD have been targeting for land acquisition for decades with renewed emphasis in recent years to allow for additional hydrologic restoration activities to occur. The mitigation property is a valuable and essential part of a larger regional restoration project with greater ecological benefit than preserving the onsite low-quality wetlands.

> ***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 125.1.4:*** *Developments which have the potential of lowering existing water quality below state and federal water quality standards will provide standardized appropriate monitoring data.*

There is no potential for lowering water quality below state and federal standards. 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. 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.

(b) Meets the Code and other applicable County regulations or qualifies for deviations

Any proposed development will be required to comply with the Land Development Code regulations in effect at the time of the application, except as otherwise described in the Planned Development or requested as a deviation in the Planned Development. The deviations proposed are justified based on the criteria in the land development code as they enhance the Planned development and do not otherwise have a negative impact on the health, safety and welfare of the general public.

(c) Is compatible with existing and planned uses in the surrounding area

The subject property is along a predominantly residential corridor of similar character and density. To the west of the subject property the land uses (RV, migrant farmworker housing and mixed use residential/commercial) are all of significantly greater intensity than the proposed development. To the east is a residential community in the City of Bonita Springs that was recently approved.

(d) Will provide access sufficient to support the proposed development intensity

The proposed residential community has direct access to Bonita Beach Road, a 4-lane divided arterial road in south Lee County.

(e) The expected impacts on transportation facilities will be addressed by existing County regulations and conditions of approval.

As noted in the Transportation Impact Statement by TR Transportation: "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."

Turn lane and site-specific improvements will be evaluated at the time of local development order. The project will also be required to pay transportation impact fees for every unit constructed.

(f) Will not adversely affect environmentally critical or sensitive areas and natural resources

The subject property has been mined and previously cleared of any vegetation. Currently the property is heavily infested with exotic vegetation and the limited area of wetlands on site provide very little functional value. There are no areas on site that would be

classified as indigenous vegetation in the Lee County land development code and there are no environmentally critical or sensitive areas on the property.

(g) Will be served by urban services, defined in the Lee Plan, if located in a Future Urban area category.

The planned development is in an area surrounded by urban development. The property fronts a 4-lane divided urban arterial roadway, both water and sewer lines extend across the property's frontage, there is a fire station 1-mile from the subject property, and a YMCA in very close proximity. Urban services are available to the subject property.

Summary:

Based on compliance with these, and other regulations, we respectfully contend that this zoning application will not place an undue burden upon existing transportation or planned infrastructure facilities. Similarly, the proposed use is appropriate at the subject location and is compatible with existing uses in the surrounding area. For these reasons, the requested re-zoning should be approved.

ATTACHMENT G

WHITE WILLOW RPD
SCHEDULE OF USES

Accessory Uses and Structures
Administrative Offices
Dwelling Unit:
  Single-Family
Essential Services
Essential Service Facilities, Group I
Excavation, Water retention
Fences, walls
Gates and gatehouses
Home Occupation
Model Home, model unit
Parking Lot, Accessory only
Real Estate Sales Office
Residential Accessory Structures
Recreational Facilities, Personal, Private, on-site
Signs, in accordance with Chapter 30

ATTACHMENT H

White Willow RPD DEVELOPMENT REGULATIONS TABLE	
MINIMUM LOT AREA	6,500 SF
MINIMUM LOT WIDTH	60’
MINIMUM LOT DEPTH	100’
MINIMUM ROADWAY SETBACK	20’
MINIMUM SIDE SETBACK	5’
MINIMUM REAR SETBACK (PRINCIPLE/ACCESSORY)	15’/5’
MINIMUM WATER SETBACK	20’
MINIMUM BUILDING SEPARATION	10’
MAXIMUM BUILDING HEIGHT	35’
MAXIMUM LOT COVERAGE	50%

ATTACHMENT I

WHITE WILLOW

SCHEDULE OF DEVIATIONS

I. PURPOSE OF REQUEST

The applicant requests the following deviations from the Lee County Land Development Code (LDC) to accommodate the project's site layout, maintain safe access along Bonita Beach Road, and support the functional development of the parcel. All deviations are illustrated on the Master Concept Plan.

II. REQUESTED DEVIATIONS

The following deviation requests from Lee County LDC. Currently, these are the only deviations that the applicant is pursuant of.

A. **Deviation 1: Required Access, LDC Section 10-291(3)** – *Residential development of more than five acres and commercial or industrial development of more than ten acres must provide more than one means of ingress or egress for the development. Access points designated for emergency use only may not be used to meet this requirement.*

1. Request: The applicant requests to deviate from the requirement of more than one access point to allow one access point and an emergency access point.

2. Justification: The project's primary access point is strategically located at a full median opening on Bonita Beach Road to ensure safe and efficient ingress and egress. Due to intersection spacing requirements and the presence of existing median openings, any secondary access would be restricted to right-in/right-out movements, creating operational inefficiencies and potential safety concerns. It is highly unlikely that an eastern access would be used for residents exiting and travelling west and there is limited benefit to a right in at an eastern access. Therefore, the traffic analysis indicates minimal demand for an eastern access point, as westbound vehicles would need to pass the main entrance and perform a U-turn at a limited-access median opening to utilize it. Given these constraints, the proposed emergency-only access provides a practical solution that meets public safety needs without introducing unnecessary conflict points. Emergency access will be controlled through gated restrictions and signage to ensure compliance with LDC intent.

B. **Deviation 2: Connection Separation, LDC Section 10-285** – *Motor vehicle connections to a road from privately maintained streets, access roads or accessways must be separated in accordance with the minimum standards.*

Bonita Beach Road is classified as a principal arterial in Future Urban Area and the connection separation required is 440 feet.

1. Request: The applicant is requesting a deviation from the requirement of 440 feet between access points to allow for a narrower distance from emergency access point to Faygin Avenue.
2. Justification: Bonita Beach Road is classified as a principal arterial within the Future Urban Area, requiring a minimum separation of 440 feet between access points. The site's geometry and adjacent public intersections limit available frontage, making full compliance impractical. The proposed emergency-only access is positioned at the safest feasible location relative to Faygin Lane, a privately maintained local roadway serving only adjacent properties. This location minimizes potential conflicts and does not create a full-movement intersection. The emergency access will be restricted to non-daily use and designed in accordance with FDOT Access Management principles to maintain roadway safety and operational integrity.

ATTACHMENT J

BONITA BEACH ROAD 50
LEE COUNTY PROTECTED SPECIES SURVEY

December 2025

Prepared For:

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Project No. 24CIG4260

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INTRODUCTION

Passarella & Associates, Inc. (PAI) conducted a protected species survey on Bonita Beach Road 50 (Project) on September 18, 2025. The survey was conducted to meet the requirements of the Lee County Land Development Code (LDC) Chapter 10, Article III, Division 8 (Protection of Habitat) Standards.

The Project totals 47.02± acres and is located in Section 32, Township 47 South, Range 26 East, Lee County (Figure 1). More specifically, the Project is bordered to the north by undeveloped land and commercial buildings; to the east by Faygin Lane, undeveloped land, and a single-family residence; to the south by Bonita Beach Road and Worthington County Club; and to the west by Sanctuary RV resort.

The following information details the land uses, survey methodology, and survey results.

LAND USES AND VEGETATION ASSOCIATIONS

The vegetation associations for the Project were originally mapped by PAI on August 16, 2024, using 2024 Lee County rectified color aerial photographs, utilizing the Florida Land Use, Cover and Forms Classification System (FLUCFCS). The mapping was subsequently updated in October 2025 per a survey boundary and wetland lines received from Barraco & Associates, Inc. Groundtruthing to map the vegetative communities was conducted utilizing FLUCFCS Level III and IV (Florida Department of Transportation 1999). Level IV was utilized to denote exotic disturbance and hydrologic conditions. AutoCAD Map 3D 2024 software was used to determine the acreage of each mapping area, produce summaries, and generate the FLUCFCS map. An aerial photograph of the Project with FLUCFCS overlay is provided as Appendix A.

Ten vegetative associations and land uses (i.e., FLUCFCS codes) were identified within the Project site. The dominant vegetation associations and land uses include Mixed Exotics (FLUCFCS Code 439), Lakes (FLUCFCS Code 520), and Disturbed Land, Hydric (FLUCFCS Code 7401), which combined occupy 35.07± acres (74.6 percent) of the site. No rare or unique uplands were identified within the Project. Table 1 provides a breakdown of the FLUCFCS codes by acreage, followed by a brief description of each of the classifications.

Table 1. Existing Land Use and Cover Summary

FLUCFCS Code	Description	Acreage (±)	Percent of Total
4289 E4	Cabbage Palm, Disturbed (76–100% Exotics)	0.76	1.6
4349 E4	Hardwood/Conifer Mixed, Disturbed (76–100% Exotics)	4.22	9.0
439	Mixed Exotics	8.40	17.9
514	Ditch	0.25	0.5
514H	Ditch, Hydric	0.11	0.2
520	Lakes	16.88	35.9

Table 1. (Continued)

FLUCFCS Code	Description	Acreage (±)	Percent of Total
619	Exotic Wetland Hardwoods	3.10	6.6
740	Disturbed Land	0.01	0.0
7401	Disturbed Land, Hydric	9.79	20.8
747	Berm	3.50	7.4
Totals		**47.02**	**100.0**

Cabbage Palm, Disturbed (76–100% Exotics) (FLUCFCS Code 4289 E4)
The canopy of this upland habitat type consists of cabbage palm (*Sabal palmetto*), earleaf acacia (*Acacia auriculiformis)*, Brazilian pepper (*Schinus terebinthifolia*), Florida strangler fig (*Ficus aurea*), and live oak (*Quercus virginiana*). The sub-canopy consists of cabbage palm, live oak, Brazilian pepper, and sicklepod (*Senna obtusifolia*). The ground cover includes rosary pea (*Abrus precatorius*), muscadine grapevine (*Vitis rotundifolia*), cabbage palm, Florida tickseed (*Coreopsis floridana*), and earleaf greenbrier (*Smilax auriculata*).

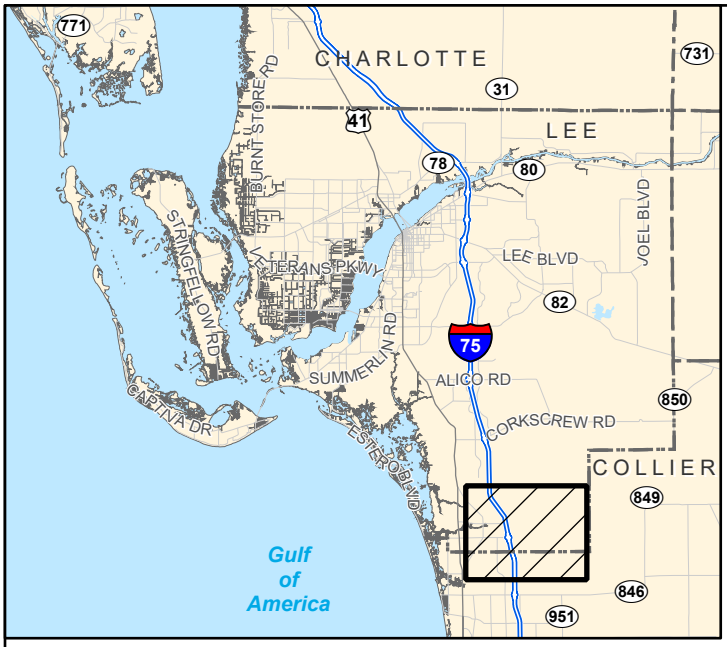
Hardwood/Conifer Mixed, Disturbed (76–100% Exotics) (FLUCFCS Code 4349 E4)
The canopy of this upland habitat type consists of cabbage palm, earleaf acacia, Torell's eucalyptus (*Corymbia torelliana*), Florida strangler fig, and scattered slash pine (*Pinus elliottii*). The sub-canopy consists of cabbage palm, earleaf acacia, and Brazilian pepper. The ground cover includes rosary pea, muscadine grapevine, Florida tickseed, earleaf greenbrier, broomsedge (*Andropogon virginicus*), and dog fennel (*Eupatorium capillifolium*).

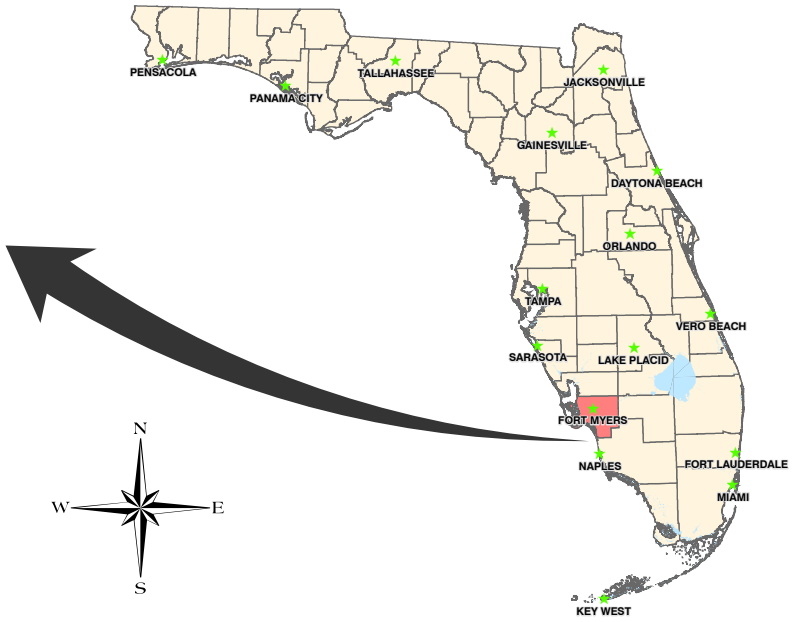
Mixed Exotics (FLUCFCS Code 439)
The canopy of this upland habitat type consists of earleaf acacia, laurel oak (*Quercus laurifolia*), and cabbage palm. The sub-canopy consists of cabbage palm, Brazilian pepper, and Java plum (*Syzygium cumini*). The ground cover consists of Brazilian pepper, caesarweed (*Urena lobata*), dog fennel, woodland false buttonweed (*Spermacoce remota*), balsam pear (*Momordica charantia*), common ragweed (*Ambrosia artemisiifolia*), common dayflower (*Commelina diffusa* var. *diffusa*), Florida tickseed, earleaf greenbrier, creeping cucumber (*Melothria pendula*), rosary pea, muscadine grapevine, and blackberry (*Rubus* sp.).

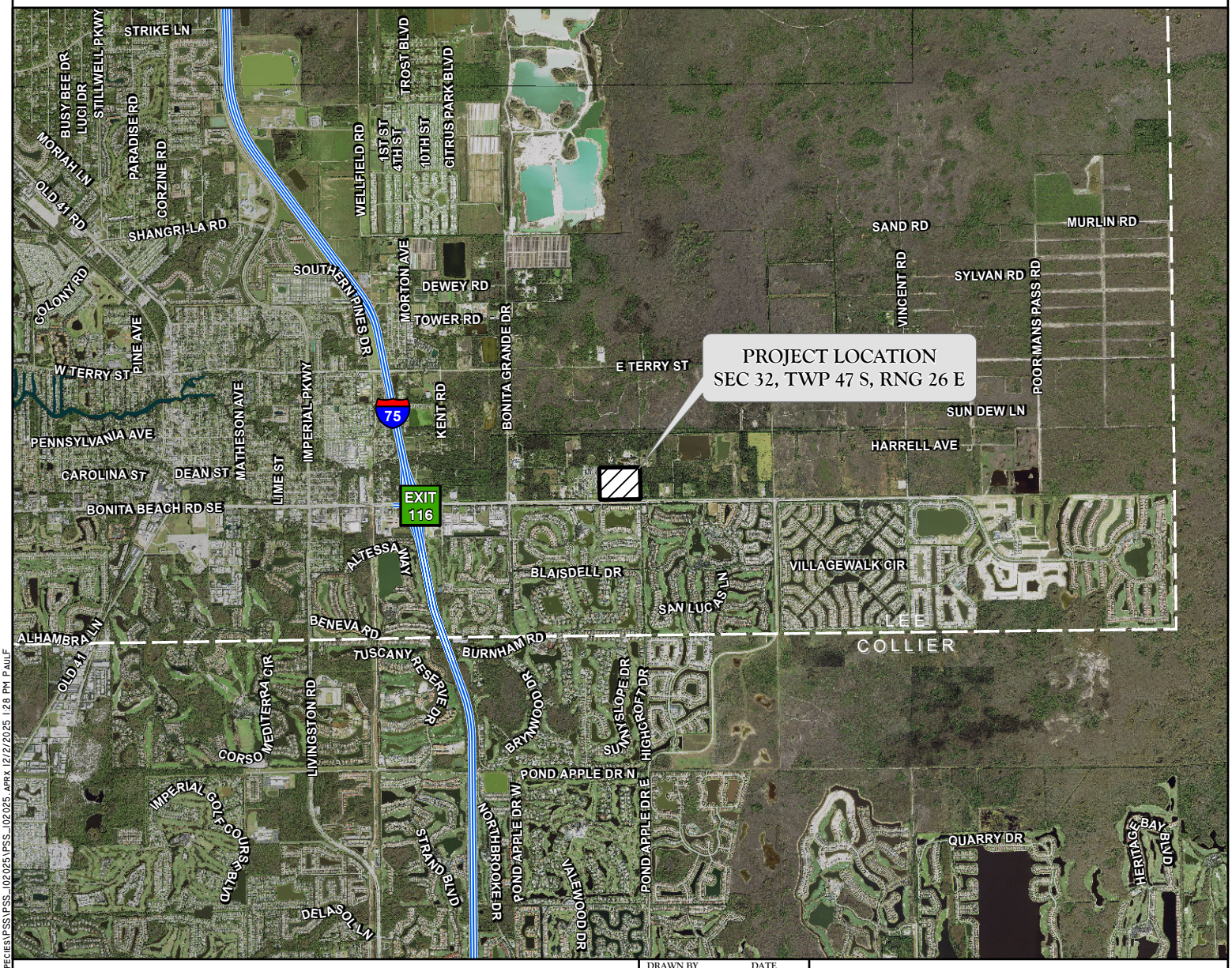
Ditch (FLUCFCS Code 514)
This land-use type is a shallow man-made ditch along the southern and eastern border of the Project site.

Ditch, Hydric (FLUCFCS Code 514H)
This land-use type is a shallow man-made ditch within a wetland habitat type along the southern border of the Project site.

Lakes (FLUCFCS Code 520)
This land-use type consists of man-made lakes.







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FIGURE 1. PROJECT LOCATION MAP
BONITA BEACH ROAD 50

DRAWN BY	DATE
P.F.	10/16/25
REVIEWED BY	DATE
S.J.	10/16/25
REVISED	DATE

Passarella & Associates, Inc.
Consulting Ecologists

Exotic Wetland Hardwoods (FLUCFCS Code 619)
The canopy of this wetland habitat type consists of earleaf acacia, Brazilian pepper, widely scattered bald cypress (*Taxodium distichum*), cabbage palm, and scattered laurel oak. The sub-canopy consists of bullhorn acacia (*Vachellia cornigera*), earleaf acacia, and scattered cabbage palm. The ground cover consists of rosary pea, caesarweed, dog fennel, spermacoce (*Spermacoce verticillata*), and Florida tickseed.

Disturbed Land (FLUCFCS Code 740)
The canopy is open. The sub-canopy contains widely scattered Brazilian pepper and earleaf acacia. The ground cover contains bahiagrass (*Paspalum notatum*).

Disturbed Land, Hydric (FLUCFCS Code 7401)
The canopy of this wetland habitat type is mostly open with widely scattered live oak, bald cypress, melaleuca (*Melaleuca quinquenervia*), and earleaf acacia. The sub-canopy consists of scattered earleaf acacia, wax myrtle (*Morella cerifera*), melaleuca, Florida bully (*Sideroxylon reclinatum* subsp. *reclinatum*), and bald cypress. The ground cover consists of rosary pea, caesarweed, Virginia saltmarsh mallow (*Kosteletzkya pentacarpos*), dog fennel, torpedograss (*Panicum repens*), spermacoce, Florida tickseed, swamp fern (*Telmatoblechnum serrulatum*), blue maidencane (*Amphicarpum muehlenbergianum*), toadflax (*Linaria floridana*), broomsedge, bulltongue arrowhead (*Sagittaria lancifolia* subsp. *lancifolia*), and scattered fireflag (*Thalia geniculata*).

Berm (FLUCFCS Code 747)
The canopy and sub-canopy are mostly open with widely scattered live oak. The ground cover includes bahiagrass, tropical Mexican clover (*Richardia brasiliensis*), caesarweed, and blackberry.

METHODOLOGY AND DISCUSSION

Surveys for Lee County protected species are based on the presence of specific vegetation associations and habitat types, as outlined in the LDC. The frequency of transects performed in these habitats was designed to meet the 80 percent minimum coverage requirement, per the LDC. Table 2 outlines those protected species that may inhabit or utilize particular vegetation associations, according to the LDC.

Table 2. Potential Lee County Protected Species by Habitat Type

FLUCFCS Code	Description	Potential Protected Species
4289 E4	Cabbage Palm, Disturbed (76–100% Exotics)	Eastern Indigo Snake (*Drymarchon couperi*)
		Audubon's Crested Caracara (*Caracara cheriway*)
		Florida Black Bear (*Ursus americanus floridanus*)
		Florida Panther (*Puma concolor coryi*)
		Simpson's Stopper (*Myrcianthes fragrans*)

Table 2. (Continued)

FLUCFCS Code	Description	Potential Protected Species
4349 E4	Hardwood/Conifer Mixed, Disturbed (76–100% Exotics)	Florida Panther (*Puma concolor coryi*)
439	Mixed Exotics	N/A
514	Ditch	American Alligator (*Alligator mississippiensis*)
		Limpkin (*Aramus guarauna*)
		Little Blue Heron (*Egretta caerulea*)
		Reddish Egret (*Egretta rufescens*)
		Roseate Spoonbill (*Platalea ajaja*)
		Snowy Egret (*Egretta thula*)
		Tri-Colored Heron (*Egretta tricolor*)
		Everglades Mink (*Mustela vison evergladensis*)
514H	Ditch, Hydric	American Alligator (*Alligator mississippiensis*)
		Limpkin (*Aramus guarauna*)
		Little Blue Heron (*Egretta caerulea*)
		Reddish Egret (*Egretta rufescens*)
		Roseate Spoonbill (*Platalea ajaja*)
		Snowy Egret (*Egretta thula*)
		Tricolored Heron (*Egretta tricolor*)
		Everglades Mink (*Mustela vison evergladensis*)
520	Lakes	American Alligator (*Alligator mississippiensis*)
		Limpkin (*Aramus guarauna*)
		Little Blue Heron (*Egretta caerulea*)
		Reddish Egret (*Egretta rufescens*)
		Roseate Spoonbill (*Platalea ajaja*)
		Snowy Egret (*Egretta thula*)
		Tricolored Heron (*Egretta tricolor*)
		Everglades Mink (*Mustela vison evergladensis*)
		Everglades Snail Kite (*Rostrhamus sociabilis*)
619	Exotic Wetland Hardwoods	N/A
740	Disturbed Land	N/A
7401	Disturbed Land, Hydric	N/A
747	Berm	N/A

*Habitat surveyed for the species noted, although not required per the LDC.

PAI conducted a protected species survey on September 18, 2025. The survey utilized meandering pedestrian transects, per the Wilson Miller, Inc. methodology previously approved by Lee County. A summary of weather conditions during the protected species survey is provided in Table 3.

Table 3. Summary of Weather Conditions

Day	Temperature (°F)	Wind (mph)*	Cloud Cover (Percent)
September 18, 2025	Mid-70s to Mid-80s	6 to 9 mph NE	50 to 60

*Miles per hour

A summary of the limits of visibility, total length of transects walked, and percent of coverage by habitat type is provided in Table 4. An aerial with the FLUCFCS overlay, approximate locations of walked transects, and species locations is provided as Appendix B.

Table 4. Summary of Habitat Coverage

FLUCFCS Code	Description	Total Area (Acres ±)	Transect Length (Feet ±)	Average Visibility (Feet ±)[1]	Percent Coverage
4289 E4	Cabbage Palm, Disturbed (76–100% Exotics)	0.76	497	30	90
4349 E4	Hardwood/Conifer Mixed, Disturbed (76–100% Exotics)	4.22	2,757	30	90
439	Mixed Exotics	8.40	3,252	45	80
514	Ditch	0.25	87	50	80
514H	Ditch, Hydric	0.11	43	50	90
520	Lakes	16.88	2,941	100	80
619	Exotic Wetland Hardwoods	3.10	1,801	30	80
740	Disturbed Land	0.01	4	40	80
7401	Disturbed Land, Hydric	9.79	4,265	40	80
747	Berm	3.50	1,355	45	80

[1]Average visibility to each side of the transect.

SURVEY RESULTS

During the survey, two American alligators (*Alligator mississippiensis*) and one American Alligator nest were observed on the Project site. The American alligator is listed by the Florida Fish and Wildlife Conservation Commission and the U.S. Fish and Wildlife Service as federally threatened due to similarity of appearance to the American crocodile (*Crocodylus acutus*). The locations of the observed listed species are depicted on Appendix B. No Lee County protected plant species were documented on the Project site.

ABUNDANCE OF PROTECTED SPECIES OBSERVED

Density calculations are provided for each Lee County protected species documented within each habitat type. Separate calculations will be provided if more than one of the same protected species

is observed within different habitat types. Please note that density estimates for wildlife species are only provided for Lee County protected species.

The Lee County protected species abundance calculations are provided in Table 5. Table 6 summarizes the protected species survey findings.

Table 5. Lee County Protected Species Abundance Calculations

Protected Species Density = $\{n\ (C)/[L\ (W_1+W_2)]\}\ (43{,}560\ ft^2/ac)$

Where n = number of individuals observed or active plus inactive gopher tortoise burrows
L = length of transect
W_1 = distance of visibility to the right of transect
W_2 = distance of visibility to the left of transect
C = gopher tortoise conversion factor (0.5)*

*Used for gopher tortoise calculation only

American Alligator (AA)
FLUCFCS Code 520
= $\{2\ AA/[(2{,}941 ft)\ (100\ ft + 100\ ft)]\}\ (43{,}560\ ft^2/ac)$
= $\{2/588{,}200\ ft^2\}\ (43{,}560\ ft^2/ac)$
= $(3.4 \times 10^{-6}\ ft^2)\ (43{,}560\ ft^2/ac)$
= 0.15 American alligator/acre

American Alligator Nest (AA (NEST))
FLUCFCS Code 520
= $\{1\ AA/[(2{,}941 ft\ ft)\ (100\ ft + 100\ ft)]\}\ (43{,}560\ ft^2/ac)$
= $\{1/588{,}200\ ft^2\}\ (43{,}560\ ft^2/ac)$
= $(1.7 \times 10^{-6}\ ft^2)\ (43{,}560\ ft^2/ac)$
= 0.07 American alligator nests/acre

Table 6. Lee County Protected Species Survey Summary

Protected Species	FLUCFCS Code	Percent Area Surveyed	Present	Absent	Density (Per Acre)
Reptiles					
American alligator (*Alligator mississippiensis*)	514	80		X	
	514H	90		X	
	520	80	X		0.15
	619	80		X	
Eastern indigo snake (*Drymarchon couperi*)	4289 E4	90		X	
Birds					
Audubon's crested caracara (*Caracara cheriway*)	4289 E4	90		X	
Everglades snail kite (*Rostrhamus sociabilis*)	520	80		X	
Limpkin (*Aramus guarauna*)	514	80		X	
	514H	90		X	
	520	80		X	
Little blue heron (*Egretta caerulea*)	514	80		X	
	514H	90		X	
	520	80		X	
Reddish egret (*Egretta rufescens*)	514	80		X	
	514H	90		X	
	520	80		X	
	619	80		X	
Roseate spoonbill (*Platalea ajaja*)	514	80		X	
	514H	90		X	
	520	80		X	
Snowy egret (*Egretta thula*)	514	80		X	
	514H	90		X	
	520	80		X	
Tricolored heron (*Egretta tricolor*)	514	80		X	
	514H	90		X	
	520	80		X	
Mammals					
Everglades mink (*Mustela vison evergladensis*)	514	80		X	
	514H	90		X	
	520	80		X	

Table 6. (Continued)

Protected Species	FLUCFCS Code	Percent Area Surveyed	Present	Absent	Density (Per Acre)
Mammals (Continued)					
Florida black bear (*Ursus americanus floridanus*)	4289 E4	90		X	
Florida panther (*Puma concolor coryi*)	4289 E4	90		X	
	4349 E4	90		X	

MANAGEMENT PLAN

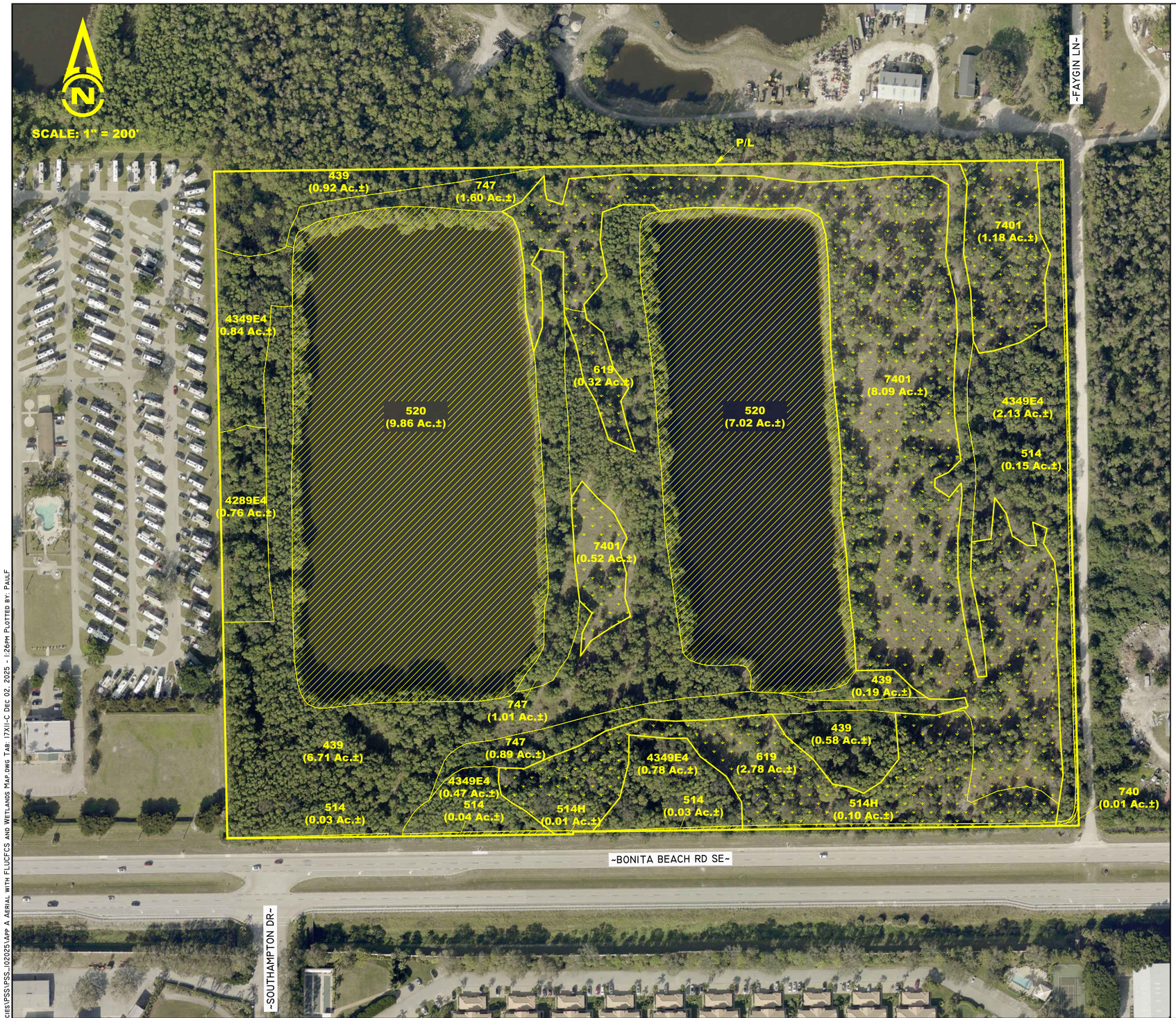
Prior to the issuance of a development order, a protected species management plan per LDC 10-474 will be prepared and submitted to the Department of Community Development as part of the Lee County review process for the Project. The protected species management plan will outline protection measures for the protected species documented on the Project site.

REFERENCES

Florida Department of Transportation. 1999. Florida Land Use, Cover and Forms Classification System. Procedure No. 550-010-001-a. Third Edition.

APPENDIX A

AERIAL WITH FLUCFCS AND WETLANDS MAP



LEGEND:

SFWMD WETLANDS
(13.00 Ac.±)

SFWMD "OTHER SURFACE WATERS"
(17.13 Ac.±)

SURVEYED WETLAND LINE

FLUCFCS CODES	DESCRIPTIONS	ACREAGE	% OF TOTAL
4289 E4	CABBAGE PALM, DISTURBED (76-100% EXOTICS)	0.76 Ac.±	1.6%
4349 E4	HARDWOOD/CONIFER MIXED, DISTURBED (76-100% EXOTICS)	4.22 Ac.±	9.0%
439	MIXED EXOTICS	8.40 Ac.±	17.9%
514	DITCH	0.25 Ac.±	0.5%
514H	DITCH, HYDRIC	0.11 Ac.±	0.2%
520	LAKES	16.88 Ac.±	35.9%
619	EXOTIC WETLAND HARDWOODS	3.10 Ac.±	6.6%
740	DISTURBED LAND	0.01 Ac.±	0.0%
7401	DISTURBED LAND, HYDRIC	9.79 Ac.±	20.8%
747	BERM	3.50 Ac.±	7.4%
	TOTAL	**47.02 Ac.±**	**100.0%**

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.

FLUCFCS LINES ESTIMATED FROM 1"=200' AERIAL PHOTOGRAPHS AND LOCATIONS APPROXIMATED.

FLUCFCS PER FLORIDA LAND USE, COVER AND FORMS CLASSIFICATION SYSTEM (FLUCFCS) (FDOT 1999).

UPLAND/WETLAND LIMITS HAVE NOT BEEN REVIEWED BY ANY REGULATORY AGENCY AND ARE SUBJECT TO CHANGE.

J:\2024\24cig4260\Species\PSS\PSS_102025\App A Aerial with FLUCFCS and Wetlands Map.dwg Tab: 17x11-C Dec 02, 2025 - 1:26pm Plotted by: Paulf

REVISIONS	DATE

DRAWN BY: A.G.	DATE: 10/20/25
DESIGNED BY: P.S.	DATE: 10/20/25
REVIEWED BY: S.J.	DATE: 10/20/25

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Fax (239) 274-0069

PASSARELLA & ASSOCIATES INC.
Consulting Ecologists

BONITA BEACH ROAD 50

AERIAL WITH FLUCFCS AND WETLANDS MAP

DRAWING No.: 24CIG4260

SHEET No.: APPENDIX A

APPENDIX B

AERIAL WITH FLUCFCS, SURVEY TRANSECTS, AND PROTECTED SPECIES LOCATION



LEGEND:

- SFWMD WETLANDS (13.00 Ac.±)
- SFWMD "OTHER SURFACE WATERS" (17.13 Ac.±)
- SURVEYED WETLAND LINE
- APPROXIMATE LOCATION OF WALKED TRANSECTS
- AA AMERICAN ALLIGATOR

FLUCFCS CODES	DESCRIPTIONS	ACREAGE	% OF TOTAL
4289 E4	CABBAGE PALM, DISTURBED (76-100% EXOTICS)	0.76 Ac.±	1.6%
4349 E4	HARDWOOD/CONIFER MIXED, DISTURBED (76-100% EXOTICS)	4.22 Ac.±	9.0%
439	MIXED EXOTICS	8.40 Ac.±	17.9%
514	DITCH	0.25 Ac.±	0.5%
514H	DITCH, HYDRIC	0.11 Ac.±	0.2%
520	LAKES	16.88 Ac.±	35.9%
619	EXOTIC WETLAND HARDWOODS	3.10 Ac.±	6.6%
740	DISTURBED LAND	0.01 Ac.±	0.0%
7401	DISTURBED LAND, HYDRIC	9.79 Ac.±	20.8%
747	BERM	3.50 Ac.±	7.4%
	TOTAL	**47.02 Ac.±**	**100.0%**

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.

FLUCFCS LINES ESTIMATED FROM 1"=200' AERIAL PHOTOGRAPHS AND LOCATIONS APPROXIMATED.

FLUCFCS PER FLORIDA LAND USE, COVER AND FORMS CLASSIFICATION SYSTEM (FLUCFCS) (FDOT 1999).

UPLAND/WETLAND LIMITS HAVE NOT BEEN REVIEWED BY ANY REGULATORY AGENCY AND ARE SUBJECT TO CHANGE.

J:\2024\24cig4260\Species\PSS\PSS_102025\App B Aerial with FLUCFCS Survey Transects and Protected Species Location.dwg Tab: 17x11-C Dec 02, 2025 - 1:26pm Plotted by: PaulF

REVISIONS	DATE

DRAWN BY	A.G.
DATE	10/20/25
DESIGNED BY	P.S.
DATE	10/20/25
REVIEWED BY	S.J.
DATE	10/20/25

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Passarella & Associates, Inc.
Consulting Ecologists

BONITA BEACH ROAD 50
AERIAL WITH FLUCFCS, SURVEY TRANSECTS, AND PROTECTED SPECIES LOCATION

DRAWING No. 24CIG4260

SHEET No. APPENDIX B

PART 8
ENVIRONMENTAL REQUIREMENTS

A. Topography: Describe the range of surface elevations of the property. Attach a county topographic map (if available) or a USGS quadrangle map showing the subject property. **[34-373(a)(4)b.iv.]**

A Project Location Map is attached as Exhibit 1. A U.S. Geological Survey (USGS) quadrangle map of the Project is attached as Exhibit 2.

B. Sensitive Lands: Identify any environmentally sensitive lands, including, but not limited to, wetlands (as defined in the LEE Plan Section XII), flow-ways, creek beds, sand dunes, other unique landforms [see LEE Plan Policy 77.1.1 (2)] or listed species occupied habitat [see Lee County Land Development Code (LDC) Section 10-473(f)].

Wetlands on the Project site consist of forested and herbaceous habitat types (i.e., exotic wetland hardwoods, hydric ditch, and hydric disturbed land) with significantly high levels of exotic vegetation. Exotic vegetation on the property has adversely impacted the wetlands from a vegetative and hydrologic perspective. Several man-made ditches exist on the east and south sides of the Project. Additionally, two man-made lakes are also present in the central portion of the Project site.

There are 13.00± acres of South Florida Water Management District wetlands and 17.13± acres of "other surface waters" on the Project site. The wetlands are identified by the Florida Land Use, Cover and Forms Classification System (FLUCFCS) as Ditch, Hydric (FLUCFCS Code 514H); Exotic Wetland Hardwoods (FLUCFCS Code 619); and Disturbed Land, Hydric (FLUCFCS Code 7401) (Exhibit 3).

A Lee County protected species survey was conducted on the Project. Two American alligators (*Alligator mississippiensis*) and one American alligator nest were documented on the Project site. A copy of the protected species survey report is attached.

C. Preservation/Conservation of Natural Features: Describe how the lands listed in PART 8.B. above will be protected by the completed project:

The Project site does not contain indigenous vegetation as defined by Section 10-1 of the LDC. As such, there is no on-site preserve proposed for the Project.

D. Shoreline Stabilization: If the project is located adjacent to navigable natural waters, describe the method of shoreline stabilization, if any, being proposed:

Not applicable.

E. Soils Map: Attach maps drawn at the same scale as the Master Concept Plan marked or overprinted to show the soils classified in accordance with the USDA/SCS System. **[34-373(a)(4)b.i.]**

A Soils Map is attached as Exhibit 4.

F. FLUCCS Map: A Florida Land Use, Cover and Classification System (FLUCCS) map, at the same scale as the Master Concept Plan, prepared by an environmental consultant. The FLUCCS map must clearly delineate any Federal and State jurisdictional wetlands and other surface waters, including the total acreage of Federal and State wetlands. **[34-373(a)(4)c.]**

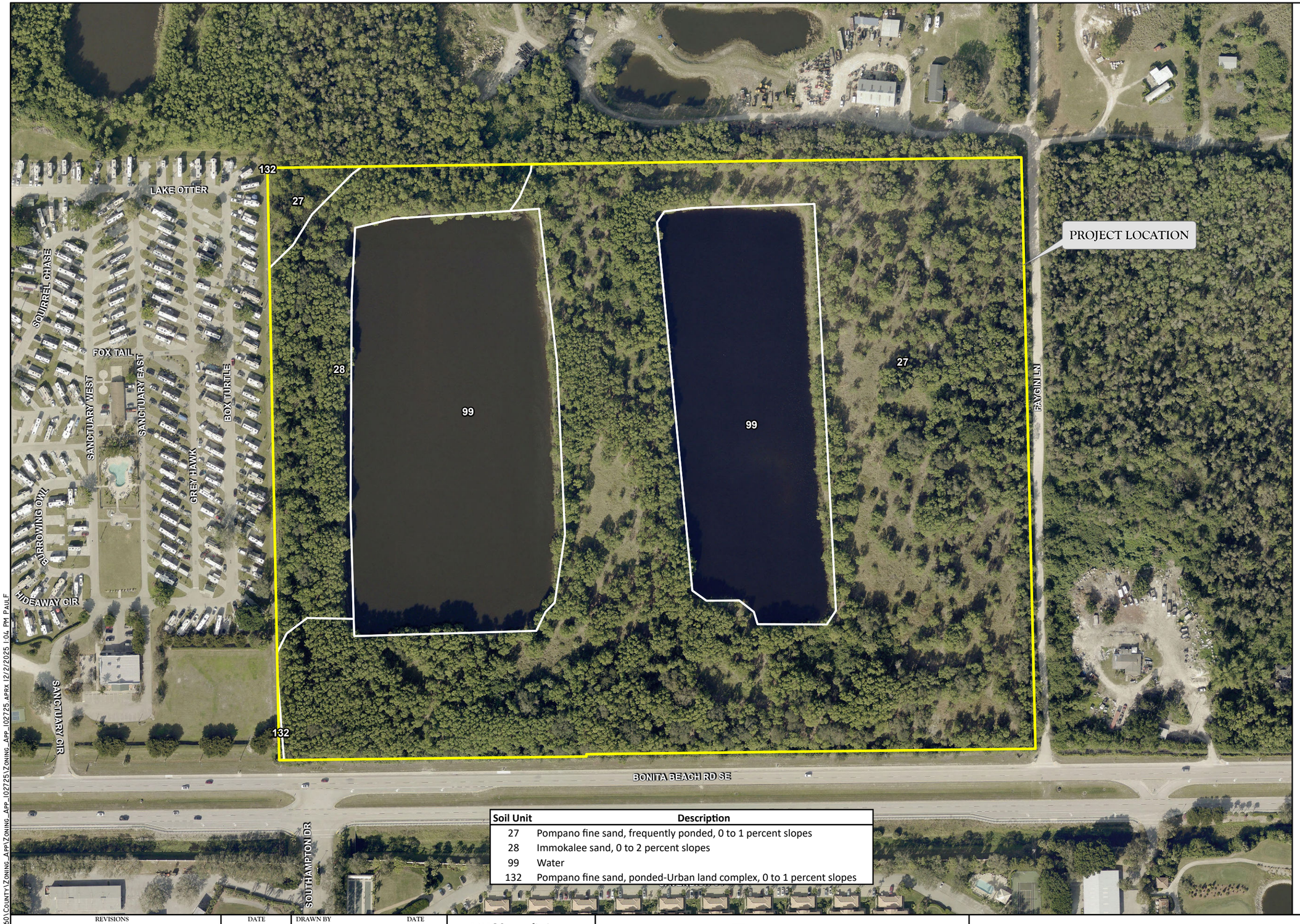
An Aerial with FLUCFCS and Wetlands Map is attached as Exhibit 3.

G. Rare & Unique Upland Habitat Map: Maps drawn at the same scale as the Master Concept Plan marked or overprinted to show significant areas of rare and unique upland habitat as defined in the LEE Plan Section XII. **[34-373(a)(4)b.iii.]**

There is no rare and unique upland habitat on the Project site.

H. Existing and Historic Flow-Ways Map: Map(s) drawn at the same scale as the master concept plan marked or overprinted to show existing and historic flow-ways. **[34-373(a)(4)b.v.]**

Not applicable.



Soil Unit	Description
27	Pompano fine sand, frequently ponded, 0 to 1 percent slopes
28	Immokalee sand, 0 to 2 percent slopes
99	Water
132	Pompano fine sand, ponded-Urban land complex, 0 to 1 percent slopes

LEGEND

- BONITA BEACH ROAD 50
- SOILS

N
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Feet

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.

SOILS MAPPING WAS ACQUIRED FROM THE UNITED STATES DEPARTMENT OF AGRICULTURE WEBSITE MAY 2024.

REVISIONS	DATE

DRAWN BY	DATE
P.F.	10/21/25
DESIGNED BY	DATE
P.S.	10/21/25
REVIEWED BY	DATE
S.J.	10/21/25

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

PASSARELLA & ASSOCIATES INC
Consulting Ecologists

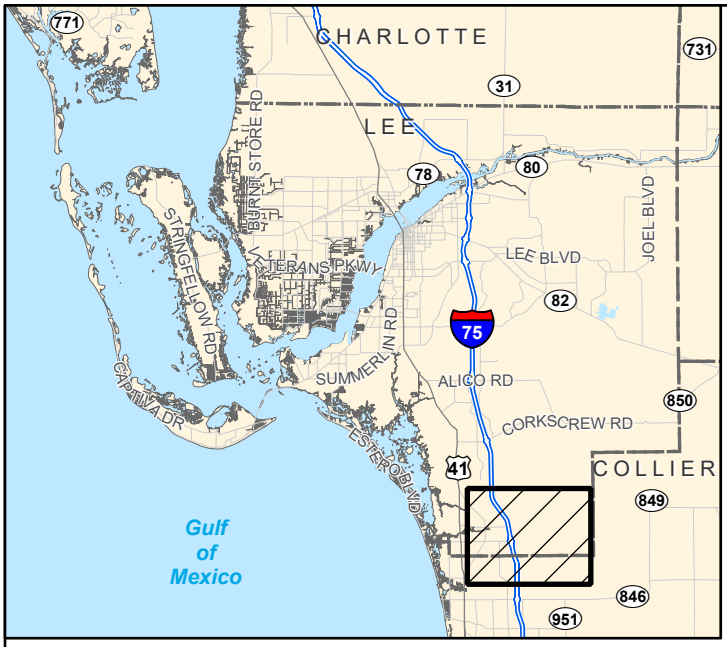
BONITA BEACH ROAD 50

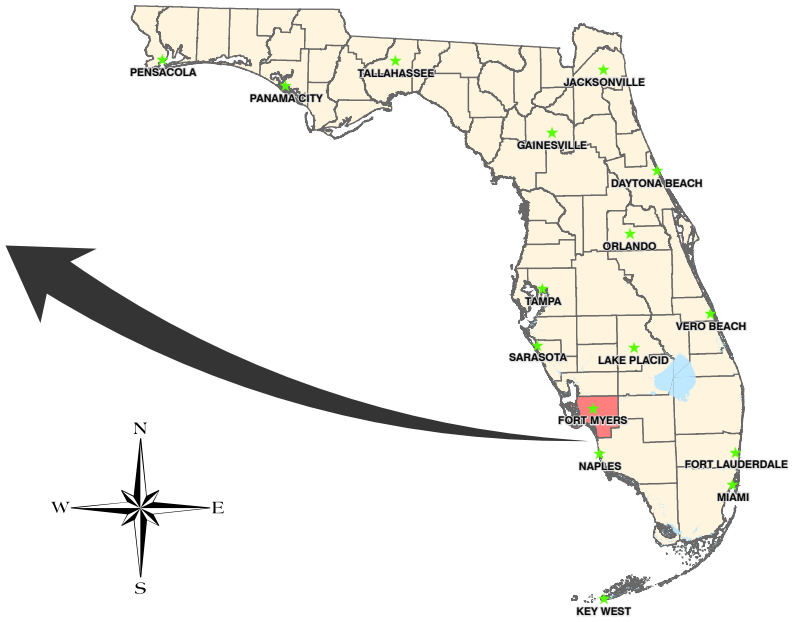
SOILS MAP

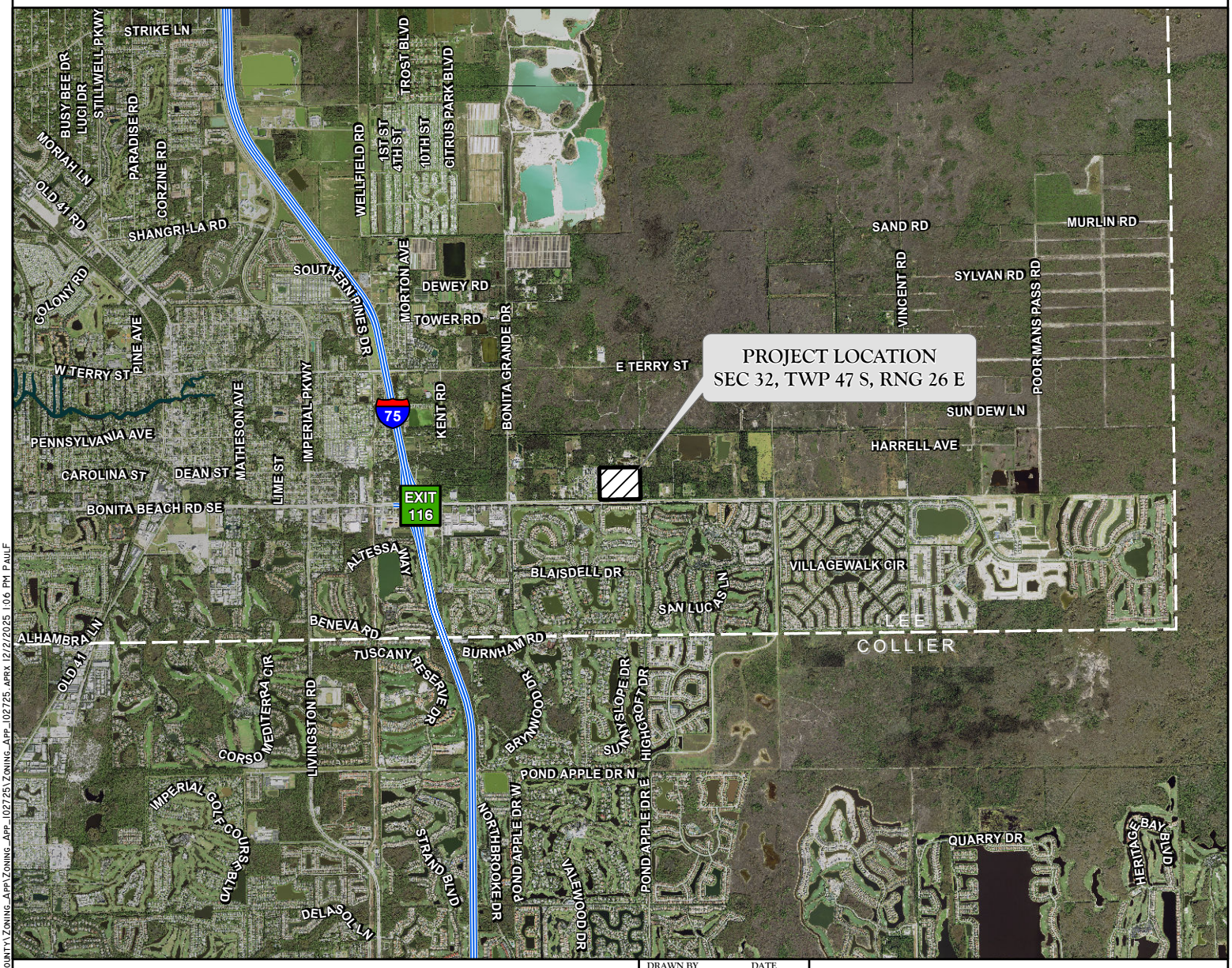
DRAWING No.
24CIG4260

SHEET No.
EXHIBIT 4

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EXHIBIT 1. PROJECT LOCATION MAP
BONITA BEACH ROAD 50

DRAWN BY	DATE
P.F.	10/20/25
REVIEWED BY	DATE
S.J.	10/20/25
REVISED	DATE

Consulting Ecologists
PASSARELLA & ASSOCIATES INC

PROJECT LOCATION

32

15

T 47

T 48

LEGEND

BONITA BEACH ROAD 50

N

W E

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0 250 500

Feet

NOTES:

DIGITAL RASTER GRAPHIC USGS TOPOGRAPHIC QUADRANGLES WERE ACQUIRED FROM THE LAND BOUNDARY INFORMATION SYSTEM (LABINS) WEBSITE JULY 2007.

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

REVISIONS	DATE

DRAWN BY	DATE
P.F.	10/21/25
DESIGNED BY	DATE
P.S.	10/21/25
REVIEWED BY	DATE
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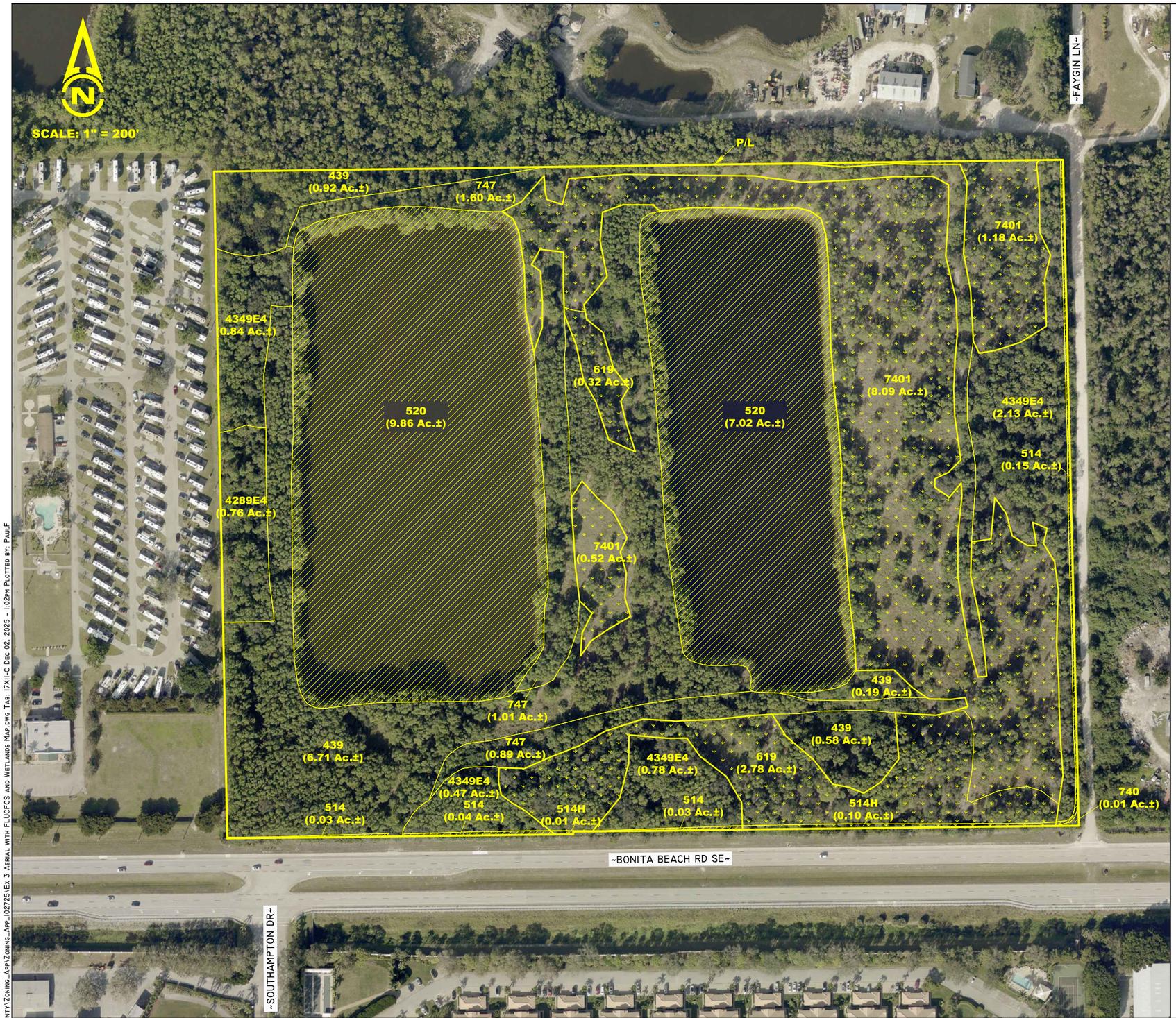
BONITA BEACH ROAD 50

QUAD SHEET

DRAWING No.
24CIG4260

SHEET No.
EXHIBIT 2

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LEGEND:

- SFWMD WETLANDS (13.00 Ac.±)
- SFWMD "OTHER SURFACE WATERS" (17.13 Ac.±)
- SURVEYED WETLAND LINE

FLUCFCS CODES	DESCRIPTIONS	ACREAGE	% OF TOTAL
4289 E4	CABBAGE PALM, DISTURBED (76-100% EXOTICS)	0.76 Ac.±	1.6%
4349 E4	HARDWOOD/CONIFER MIXED, DISTURBED (76-100% EXOTICS)	4.22 Ac.±	9.0%
439	MIXED EXOTICS	8.40 Ac.±	17.9%
514	DITCH	0.25 Ac.±	0.5%
514H	DITCH, HYDRIC	0.11 Ac.±	0.2%
520	LAKES	16.88 Ac.±	35.9%
619	EXOTIC WETLAND HARDWOODS	3.10 Ac.±	6.6%
740	DISTURBED LAND	0.01 Ac.±	0.0%
7401	DISTURBED LAND, HYDRIC	9.79 Ac.±	20.8%
747	BERM	3.50 Ac.±	7.4%
	TOTAL	**47.02 Ac.±**	**100.0%**

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.

FLUCFCS LINES ESTIMATED FROM 1"=200' AERIAL PHOTOGRAPHS AND LOCATIONS APPROXIMATED.

FLUCFCS PER FLORIDA LAND USE, COVER AND FORMS CLASSIFICATION SYSTEM (FLUCFCS) (FDOT 1999).

UPLAND/WETLAND LIMITS HAVE NOT BEEN REVIEWED BY ANY REGULATORY AGENCY AND ARE SUBJECT TO CHANGE.

J:\2024\24cig4260\COUNTY\ZONING_APP\ZONING_APP_102725\Ex. 3 AERIAL WITH FLUCFCS AND WETLANDS MAP.DWG TAB: 17X11-C Dec 02, 2025 - 1:02PM PLOTTED BY: PAULF

REVISIONS	DATE

DRAWN BY: A.G.	DATE: 10/20/25
DESIGNED BY: P.S.	DATE: 10/20/25
REVIEWED BY: S.J.	DATE: 10/20/25

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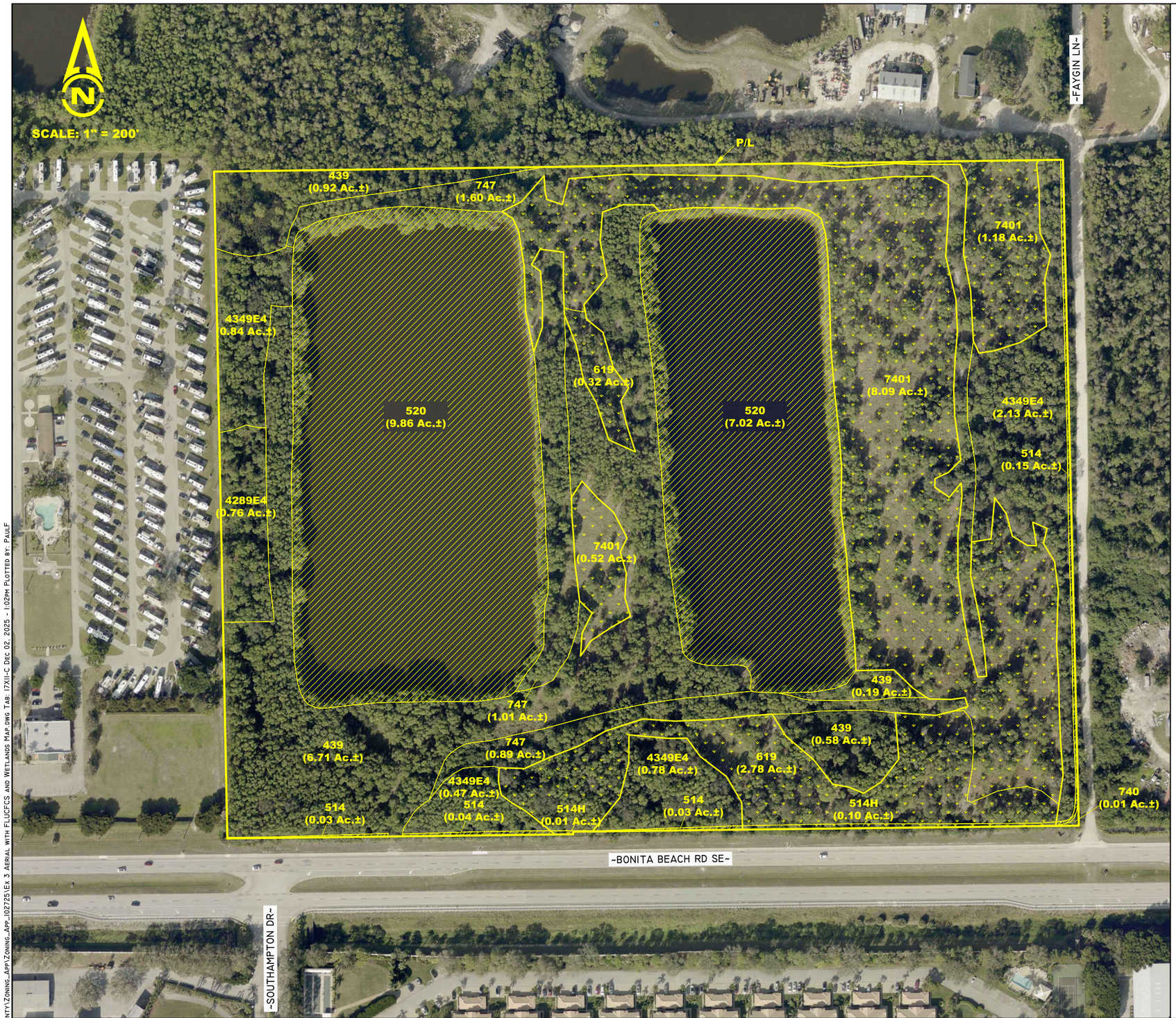
PASSARELLA & ASSOCIATES, INC. Consulting Ecologists

BONITA BEACH ROAD 50

AERIAL WITH FLUCFCS AND WETLANDS MAP

DRAWING No. 24CIG4260

SHEET No. EXHIBIT 3



LEGEND:

- SFWMD WETLANDS (13.00 Ac.±)
- SFWMD "OTHER SURFACE WATERS" (17.13 Ac.±)
- SURVEYED WETLAND LINE

FLUCFCS CODES	DESCRIPTIONS	ACREAGE	% OF TOTAL
4289 E4	CABBAGE PALM, DISTURBED (76-100% EXOTICS)	0.76 Ac.±	1.6%
4349 E4	HARDWOOD/CONIFER MIXED, DISTURBED (76-100% EXOTICS)	4.22 Ac.±	9.0%
439	MIXED EXOTICS	8.40 Ac.±	17.9%
514	DITCH	0.25 Ac.±	0.5%
514H	DITCH, HYDRIC	0.11 Ac.±	0.2%
520	LAKES	16.88 Ac.±	35.9%
619	EXOTIC WETLAND HARDWOODS	3.10 Ac.±	6.6%
740	DISTURBED LAND	0.01 Ac.±	0.0%
7401	DISTURBED LAND, HYDRIC	9.79 Ac.±	20.8%
747	BERM	3.50 Ac.±	7.4%
	TOTAL	**47.02 Ac.±**	**100.0%**

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.

FLUCFCS LINES ESTIMATED FROM 1"=200' AERIAL PHOTOGRAPHS AND LOCATIONS APPROXIMATED.

FLUCFCS PER FLORIDA LAND USE, COVER AND FORMS CLASSIFICATION SYSTEM (FLUCFCS) (FDOT 1999).

UPLAND/WETLAND LIMITS HAVE NOT BEEN REVIEWED BY ANY REGULATORY AGENCY AND ARE SUBJECT TO CHANGE.

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REVISIONS	DATE

DRAWN BY: A.G.	DATE: 10/20/25
DESIGNED BY: P.S.	DATE: 10/20/25
REVIEWED BY: S.J.	DATE: 10/20/25

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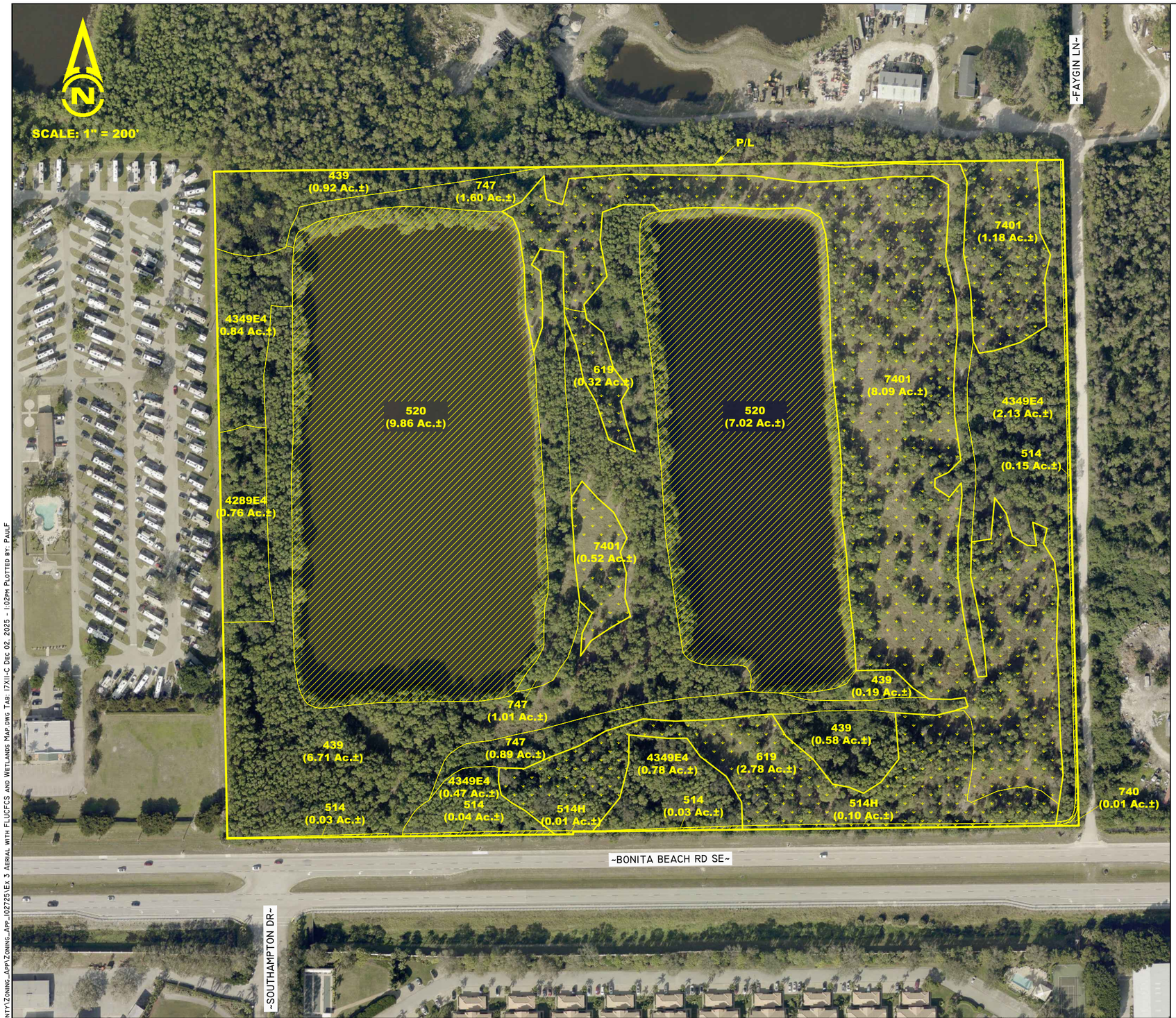
PASSARELLA & ASSOCIATES, INC. Consulting Ecologists

BONITA BEACH ROAD 50

AERIAL WITH FLUCFCS AND WETLANDS MAP

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7401	DISTURBED LAND, HYDRIC	9.79 Ac.±	20.8%
747	BERM	3.50 Ac.±	7.4%
	TOTAL	**47.02 Ac.±**	**100.0%**

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.

FLUCFCS LINES ESTIMATED FROM 1"=200' AERIAL PHOTOGRAPHS AND LOCATIONS APPROXIMATED.

FLUCFCS PER FLORIDA LAND USE, COVER AND FORMS CLASSIFICATION SYSTEM (FLUCFCS) (FDOT 1999).

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REVISIONS	DATE

DRAWN BY: A.G.	DATE: 10/20/25
DESIGNED BY: P.S.	DATE: 10/20/25
REVIEWED BY: S.J.	DATE: 10/20/25

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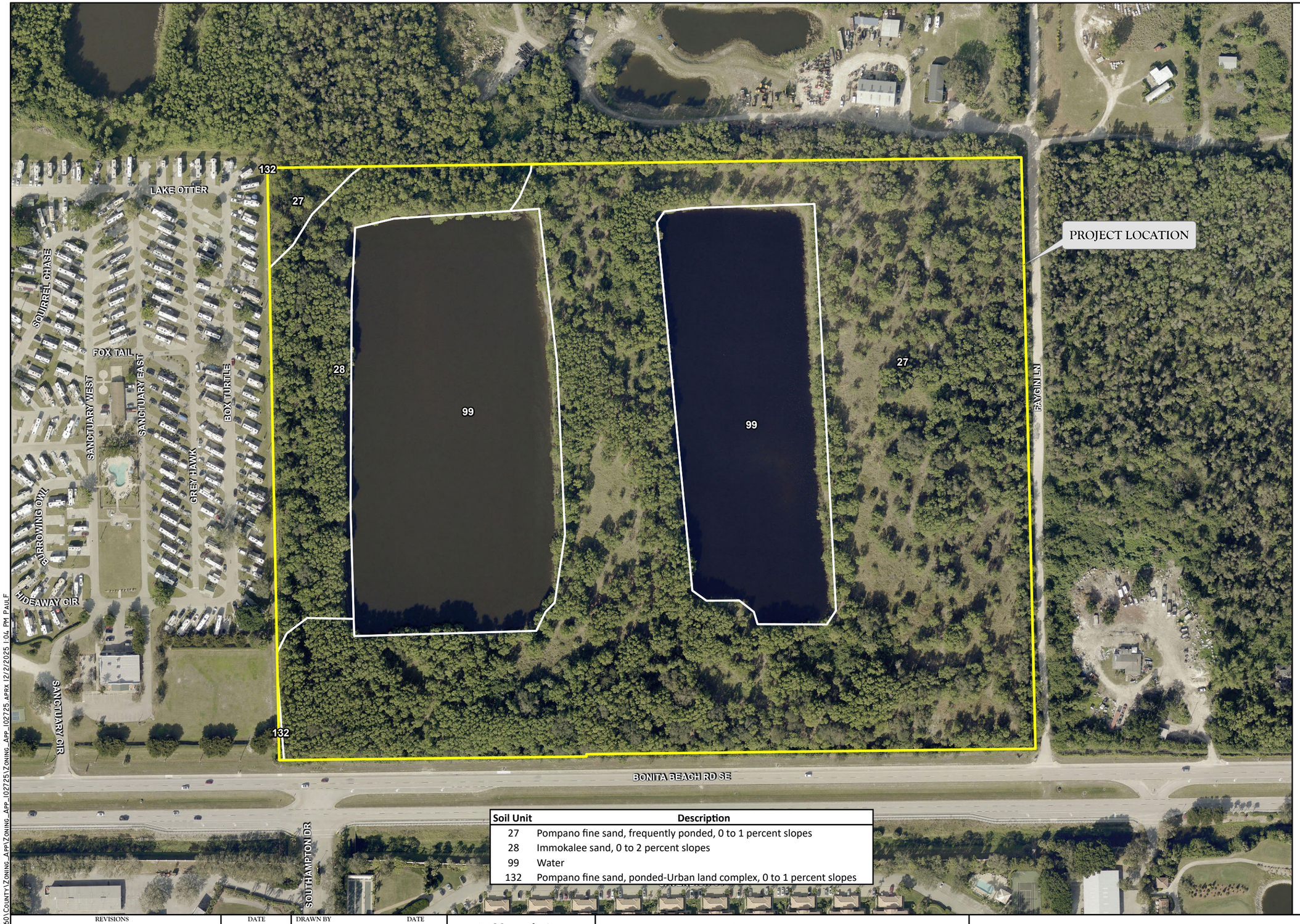
BONITA BEACH ROAD 50

AERIAL WITH FLUCFCS AND WETLANDS MAP

DRAWING No. 24CIG4260

SHEET No. EXHIBIT 3


Corkscrew Regional Ecosystem Watershed
(CREW)
Pine Lake
Preserve
Bonita Grande Dr.
I-75
RV
Park
Bonita Beach Road
Worthington Country Club
Palmira
Quail West
Bonita Beach 50
Bonita Springs
Flowway Arrows
Historic Flowways Connections
Flowways 2005
DELISI
Land Use Planning & Water Policy
Historic Flowways Map
admin@delisi-inc.com
www.delisi-inc.com
Lee County, FL, State of Florida, Vantor



Soil Unit	Description
27	Pompano fine sand, frequently ponded, 0 to 1 percent slopes
28	Immokalee sand, 0 to 2 percent slopes
99	Water
132	Pompano fine sand, ponded-Urban land complex, 0 to 1 percent slopes

LEGEND

- BONITA BEACH ROAD 50
- SOILS

N
W E
S

0 100 200
Feet

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.

SOILS MAPPING WAS ACQUIRED FROM THE UNITED STATES DEPARTMENT OF AGRICULTURE WEBSITE MAY 2024.

REVISIONS	DATE

DRAWN BY	DATE
P.F.	10/21/25
DESIGNED BY	DATE
P.S.	10/21/25
REVIEWED BY	DATE
S.J.	10/21/25

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PASSARELLA & ASSOCIATES INC
Consulting Ecologists

BONITA BEACH ROAD 50

SOILS MAP

DRAWING No.
24CIG4260

SHEET No.
EXHIBIT 4

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ATTACHMENT K

Lee County, Florida
DEPARTMENT OF COMMUNITY DEVELOPMENT
ENVIRONMENTAL STAFF REPORT

CASE NUMBER: DCI2025-00028
TYPE OF CASE: Rezone
CASE NAME: White Willow RPD
TOTAL ACREAGE: 47 ±
SUFFICIENCY DATE: 05/27/2026
HEARING EXAMINER DATE: October 15, 2026

Request:
The applicant is requesting to rezone 47± acres from Agricultural (AG-2) to Residential Planned Development (RPD) to construct 94 single family units.

Existing Conditions:
The subject property is located in the Density Reduction/ Groundwater Resource and Wetland Future Land Use category and Southeast Lee County Community Plan Area.

The current FLU categories are subject to change to Outlying Suburban Future Land Use category pending the outcome of CPA2025-00013.

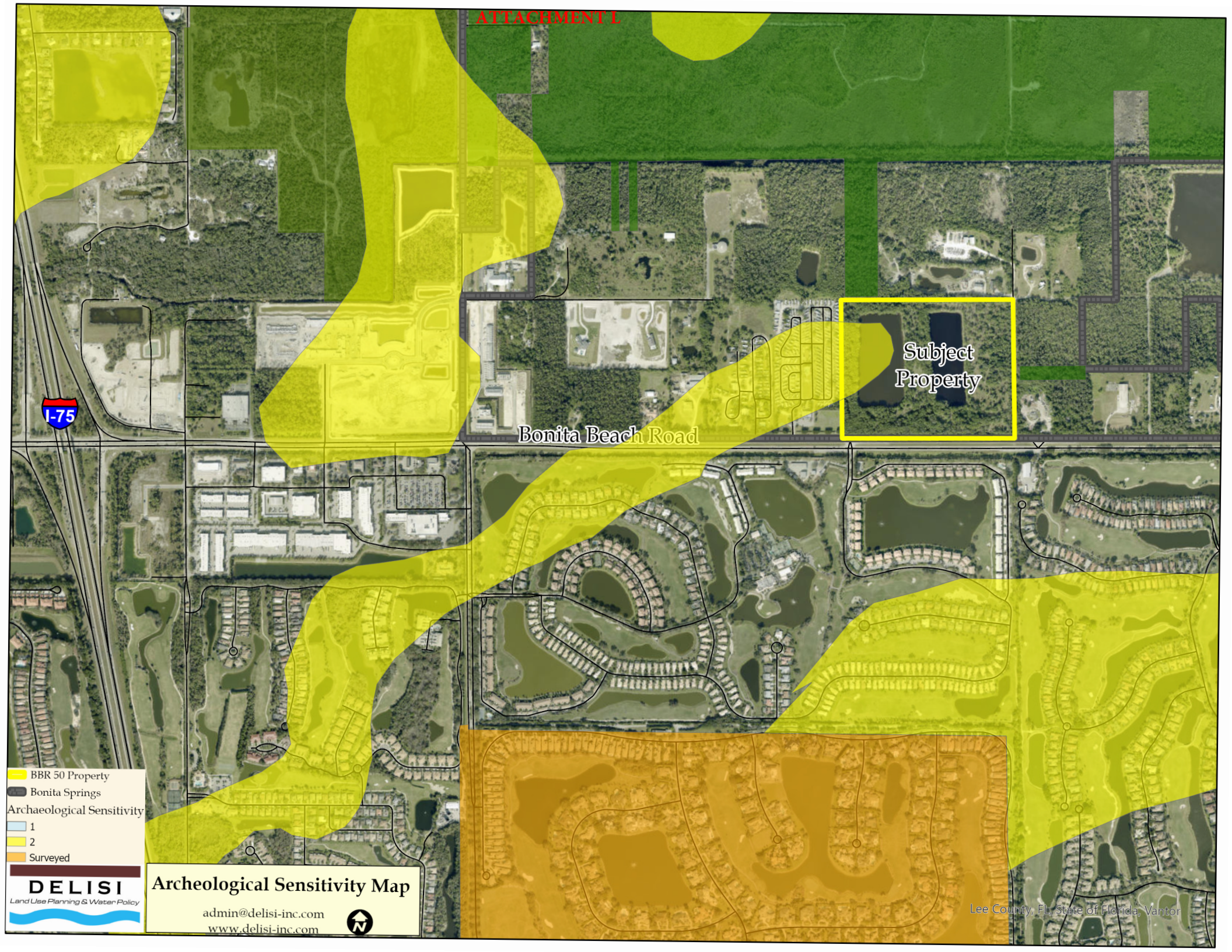
The site is currently undeveloped with two existing lakes.

Buffers:
Residentially zoned properties are required to only provide buffering when the subject property is abutting a public preserve per LDC Section 10-416(d)(3) and 10-416(d)(4).

The applicant is complying with these code sections and providing a 30-foot Type F buffer along the northeast property line.

Open Space and Indigenous Open Space:
Property development regulations for Residential zoning districts does not require open space for a single-family lot with a minimum lot size of 6,500 square feet and does not require indigenous open space per LDC Section 10-415.

ATTACHMENT I



ATTACHMENT M

TR TRANSPORTATION CONSULTANTS, INC

2726 OAK RIDGE COURT, SUITE 503
FORT MYERS, FL 33901-9356
OFFICE 239.278.3090
FAX 239.278.1906

TRAFFIC ENGINEERING
TRANSPORTATION PLANNING
SIGNAL SYSTEMS/DESIGN

TRAFFIC IMPACT STATEMENT

FOR

BONITA BEACH 50 COMPREHENSIVE PLAN AMENDMENT & REZONING

(PROJECT NO. F2510.11)

PREPARED BY:
TR Transportation Consultants, Inc.
Certificate of Authorization Number: 27003
2726 Oak Ridge Court, Suite 503
Fort Myers, Florida 33901-9356
(239) 278-3090

January 26, 2026

TRANSPORTATION CONSULTANTS, INC

CONTENTS

I. INTRODUCTION

II. EXISTING CONDITIONS

III. COMPREHENSIVE PLAN AMENDMNET

IV. TRIP GENERATION

V. COMPREHENSIVE PLAN AMENDMENT ANALYSIS

VI. ZONING ANALYSIS

VII. CONCLUSION

TR TRANSPORTATION CONSULTANTS, INC

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

TR TRANSPORTATION CONSULTANTS, INC

SITE LOCATION
BONITA BEACH 50

Figure 1

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 ≈ 34 acres @ 1 DU/10-Acres & Wetlands ≈ 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.

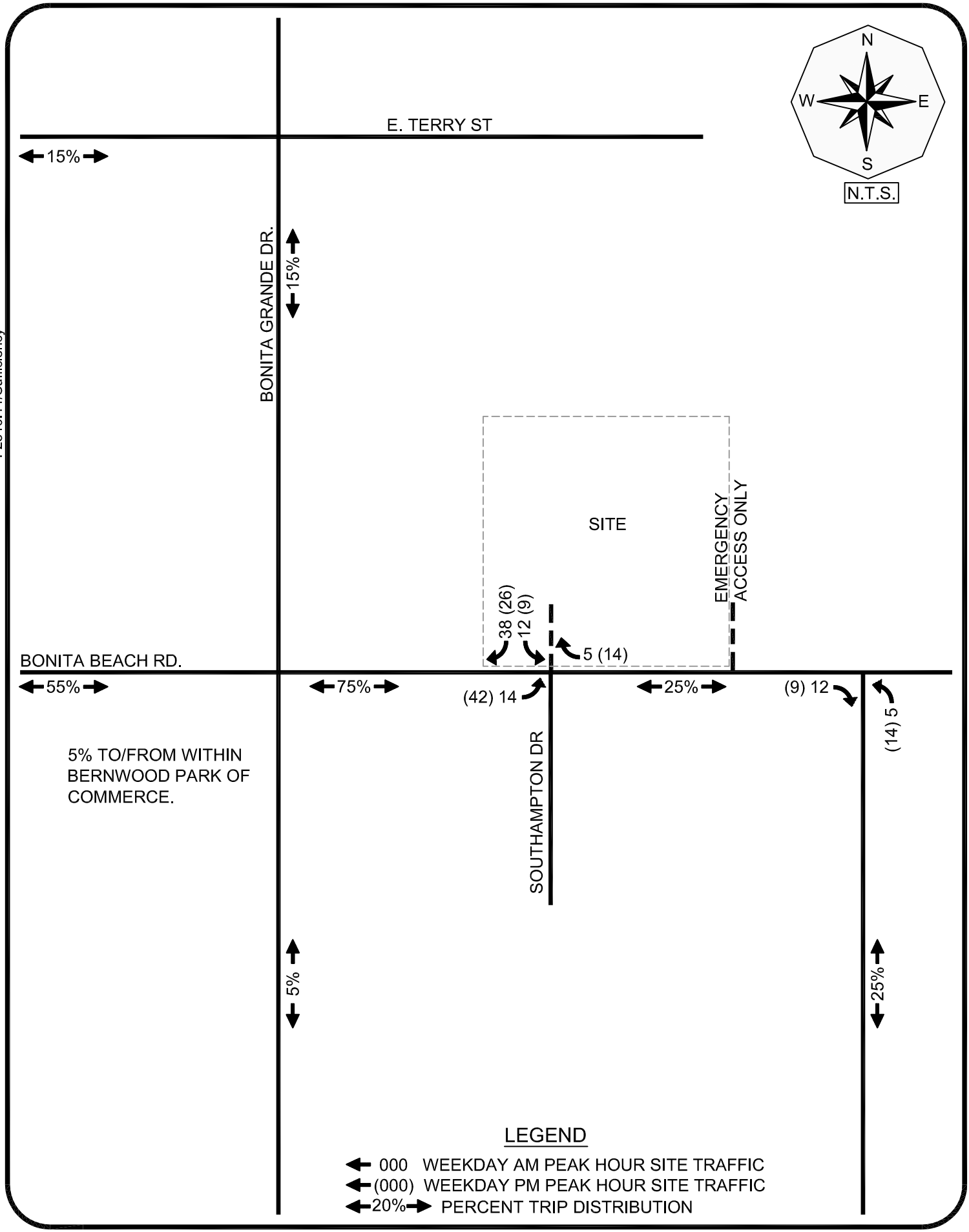
Table 6
Trip Generation – Proposed
Bonita Beach 50 RPD

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.



RESIDENTIAL
TRIP DISTRIBUTION SITE & TRAFFIC ASSIGNMENT
BONITA BEACH 50

Figure 2

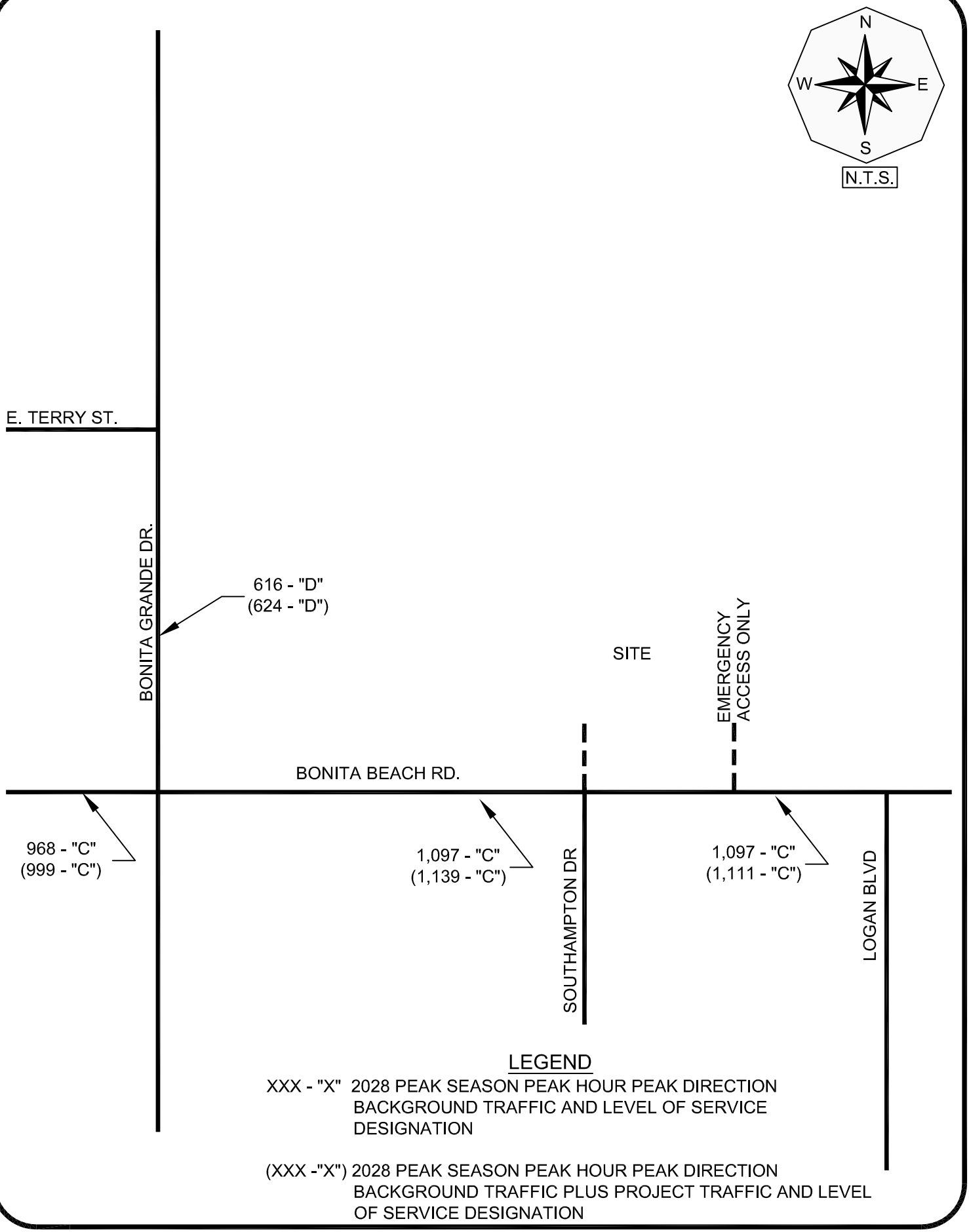
Table 6A in the Appendix of the report indicates the methodology utilized to obtain the year 2028 build-out traffic volumes as well as the growth rate utilized for each roadway segment. The base year traffic volumes for County maintained roadways were obtained from the latest ***Lee County Public Facilities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

F2510.11/Sufficiency



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 SEGMENT		2045 E + C NETWORK LANES		GENERALIZED SERVICE VOLUMES				
					LOS A	LOS B	LOS C	LOS D	LOS E
ROADWAY	**FROM**	**TO**	**# 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

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

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

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

ROADWAY	ROADWAY SEGMENT	# LANES	LOS A VOLUME	LOS B VOLUME	LOS C VOLUME	LOS D VOLUME	LOS E VOLUME	PERCENT PROJECT TRAFFIC	PROJECT TRAFFIC	PROJ/ LOS C
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

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 ADT	2021 ADT	YRS OF GROWTH. [1]	ANNUAL RATE	2024 PK HR PK SEASON PEAK DIR.[2]	2030 PK HR PK SEASON PEAK DIRECTION VOLUME	LOS	V/C Ratio	PERCENT PROJECT TRAFFIC	AM PROJ TRAFFIC	PM PROJ TRAFFIC	2030 BCKGRND + AM PROJ VOLUME	LOS	V/C Ratio	2030 BCKGRND + PM PROJ VOLUME	LOS	V/C Ratio
Bonita Beach Road	E. of Logan Blvd	0019	15,900	22,600	6	6.04%	145	246	B	0.13	0%	0	0	246	B	0.13	246	B	0.13
	E. of Site	0019	15,900	22,600	6	6.04%	868	1,471	C	0.75	25%	13	14	1,483	C	0.76	1,485	C	0.76
	W. of Site	0019	15,900	22,600	6	6.04%	868	1,471	C	0.75	75%	38	42	1,508	C	0.77	1,513	C	0.77
	W. of Southampton Dr.	0019	15,900	22,600	6	6.04%	868	1,471	C	0.75	75%	38	42	1,508	C	0.77	1,513	C	0.77
	W. of Bonita Grande Dr.	0018	21,400	25,200	6	2.76%	868	1,109	C	0.57	55%	28	31	1,137	C	0.58	1,140	C	0.58
Bonita Grande Dr	S. of E. Terry St	1202	6,200	10,600	10	5.51%	497	805	F	1.09	15%	8	8	813	F	1.10	814	F	1.10

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 mantained 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

ROADWAY	ROADWAY SEGMENT	# LANES	LOS A VOLUME	LOS B VOLUME	LOS C VOLUME	LOS D VOLUME	LOS E VOLUME	PERCENT PROJECT TRAFFIC	PROJECT TRAFFIC	PROJ/ LOS C
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

Revised 1-26-2026

ROADWAY	ROADWAY SEGMENT	LCDOT PCS OR FDOT SITE #	BASE YR ADT	2021 ADT	YRS OF GROWTH. [1]	ANNUAL RATE	2024 PK HR PK SEASON PEAK DIR.[2]	2028 PK HR PK SEASON PEAK DIRECTION VOLUME	LOS	V/C Ratio	PERCENT PROJECT TRAFFIC	AM PROJ TRAFFIC	PM PROJ TRAFFIC	2028 BCKGRND + AM PROJ VOLUME	LOS	V/C Ratio	2028 BCKGRND + PM PROJ VOLUME	LOS	V/C Ratio
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 mantained 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

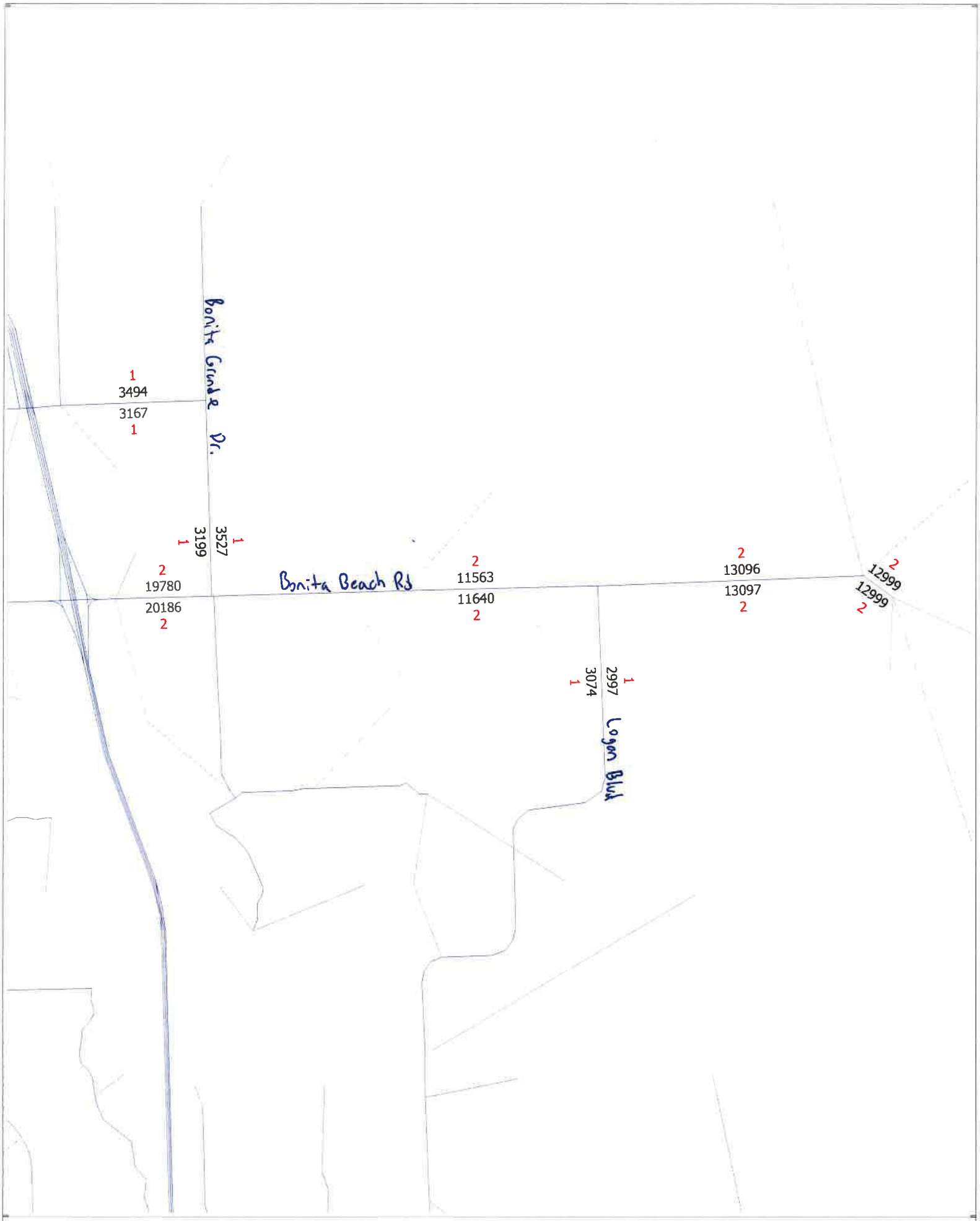
TABLE 2 HISTORIC TRAFFIC COUNT SUMMARY
CITY OF BONITA SPRINGS, FL

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 Vandebilt 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	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.

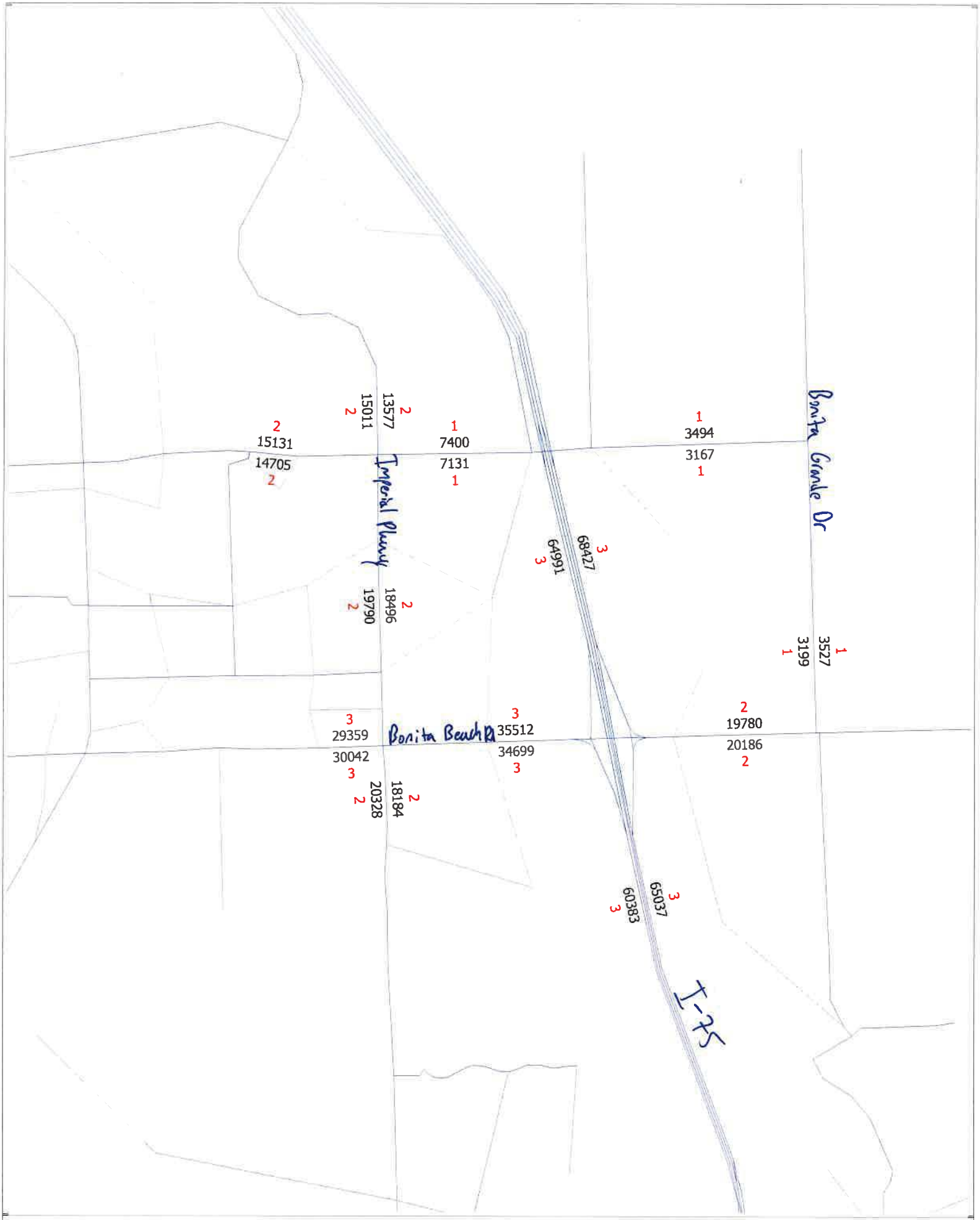
2045 FSUTMS TRAFFIC VOLUMES ON AREA NETWORK (E+C NETWORK)



2045 LRTP COST FEASIBLE ROADWAY NETWORK LANES & VOLUMES

cube

(Licensed to TR Transportation)



2045 LRTP COST FEASIBLE ROADWAY NETWORK LANES & VOLUMES

cube

(Licensed to TR Transportation)

2045 LRTP COST FEASIBLE ROADWAY NETWORK LANES & VOLUMES (PG.2/2)

cube
(Licensed to TR Transportation Consultants Inc)

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)

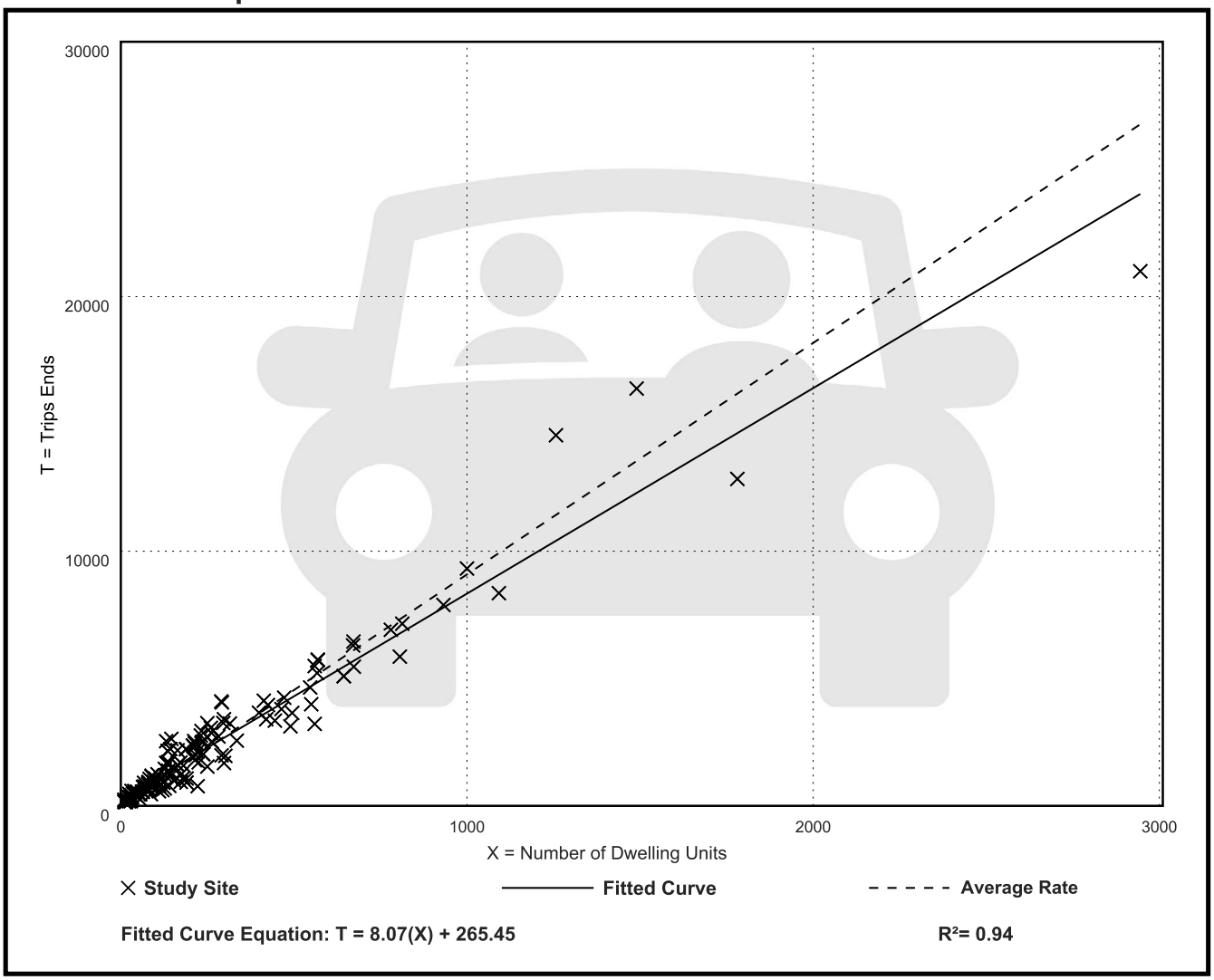
Vehicle Trip Ends vs: **Dwelling Units**
On a: **Weekday**

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



Fitted Curve Equation: T = 8.07(X) + 265.45

R^2= 0.94

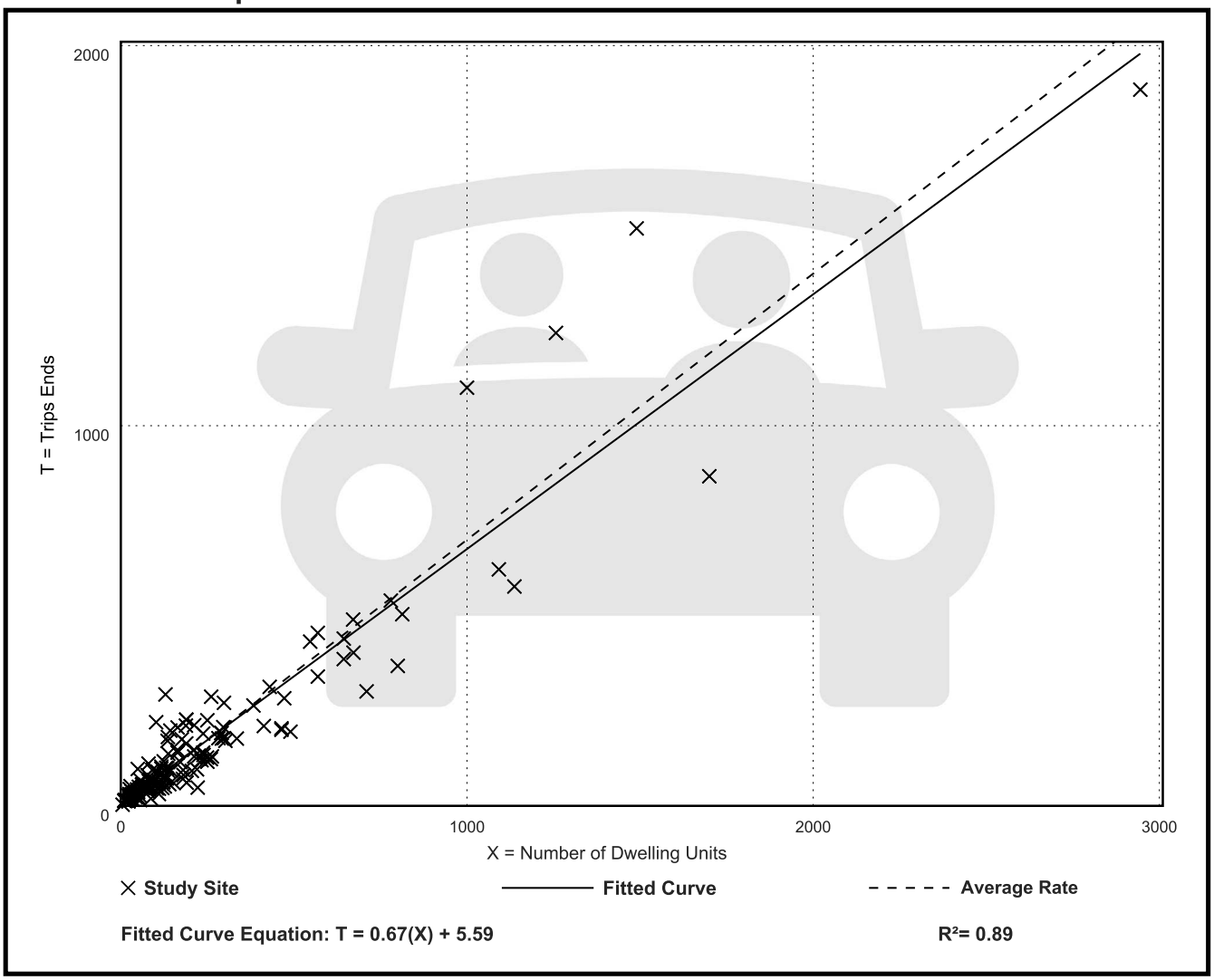
Single-Family Detached Housing
(210)

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



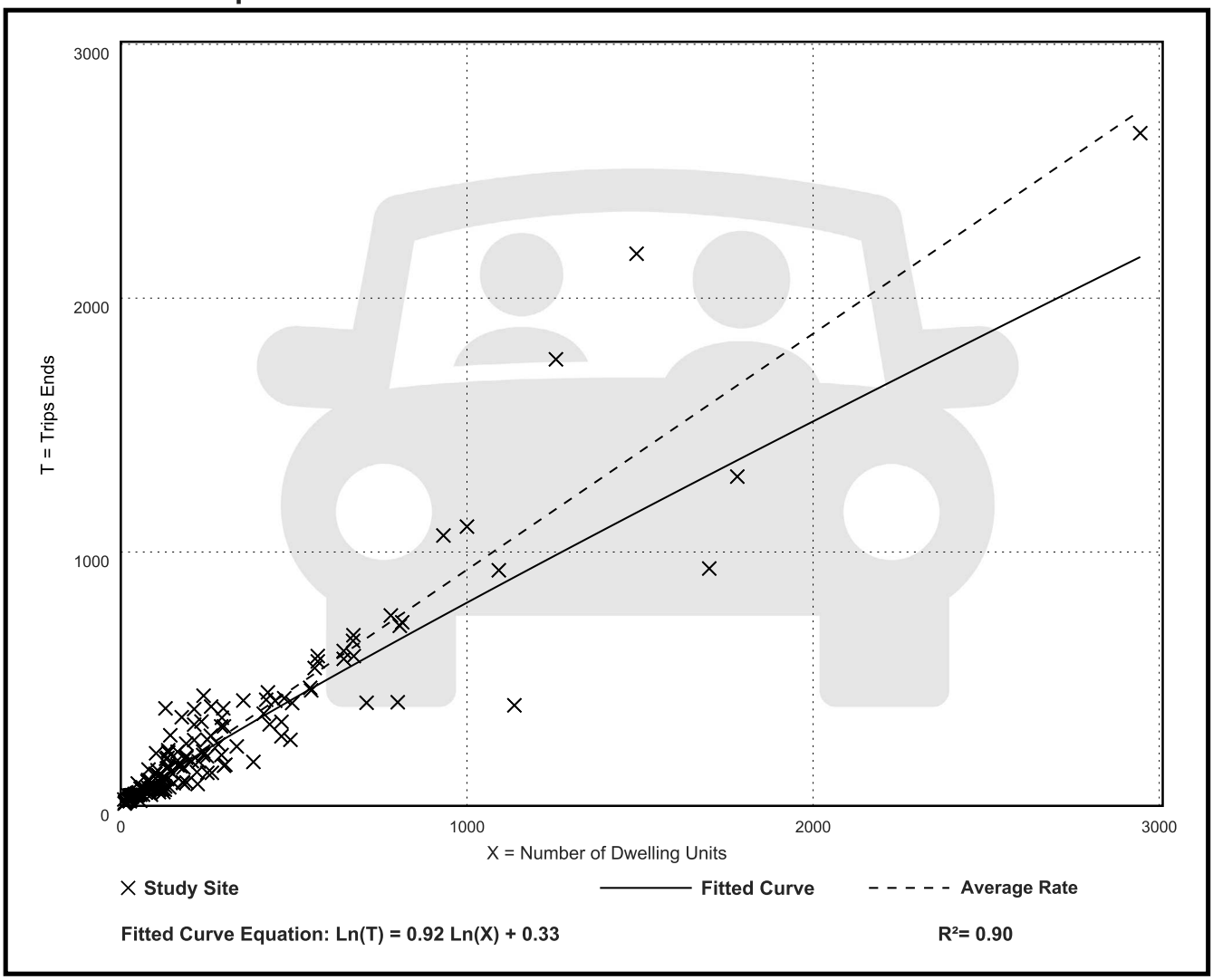
Single-Family Detached Housing
(210)

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



Fitted Curve Equation: Ln(T) = 0.92 Ln(X) + 0.33

R^2= 0.90

ATTACHMENT N

DEPARTMENT OF TRANSPORTATION

Memo

To: MarySue Groth, Senior Planner

From: John Podczerwinsky, AICP CTP, Principal Planner, D O T Engineering

Date: Sep 11, 2026

Subject: DCI2025-00028_White Willow RPD Transportation-Related Analysis

Proposed Development

This application requests a rezoning application from AG-2 to RPD to permit up to 94 single-family detached residential dwelling units.

Site Location

The subject property is located on the north side of Bonita Beach Road, approximately 1.5 miles east of I-75.

Site Access

Access to the subject site is proposed via a single access drive on Bonita Beach Road located opposite Southampton Drive. Bonita Beach Road is a four-lane divided arterial maintained by Lee County with a posted speed limit of 45 mph.

Trip Generation Review

Trip generation was determined by referencing the Institute of Transportation Engineers (ITE) Trip Generation Manual, 12th Edition, utilizing Land Use Code 210 (Single-Family Detached Housing). Table 1 outlines the proposed project's trip generation for weekday AM and PM peak hours traffic volumes. No internal capture or Pass-By reductions are contemplated as they are not consistent with the proposed land use(s).

Table 1: Trip Generation Resultant Trip Change

Land Use	Weekday A.M Peak Hour			Weekday P.M Peak Hour		
	In	**Out**	**Total**	**In**	**Out**	**Total**
LUC 210 - Single Family Detached Housing *(94 Units)*	19	50	69	56	35	91
Total Project Traffic	19	50	69	56	35	91
Total Net New Trips *(External Trips Impacting Roadway)*	**+19**	**+50**	**+69**	**+56**	**+35**	**+91**

Roadway Section Traffic Operation Level of Service Analysis

New trips related to the subject case were distributed across the surrounding road network to assess their impact on the Level of Service (LOS) in arterial/collector road sections most affected by the proposed development. According to Administrative Code AC-13-17 Traffic Study Guidelines for Planned Development Rezonings, a "significant impact" signifies a 10% or more of the LOS "C" service volumes at build-out.

The proposed development was assumed to be completed by 2028 (build-out year) for analysis purposes. Therefore, the roadway links impacted by the proposed development were analyzed for the 2028 traffic conditions without the proposed development and with the proposed development (Table 2).

All analyzed roadway links and intersections within the study area are projected to operate at or better than adopted Level of Service standards for all evaluated horizon years both with and without the project. Turn lane improvements at the site access drive will be evaluated during the Development Order stage.

Table 2: Arterial/Collector roadway sections adjacent to site expected to be impacted by the proposed development

Roadway	Location		Level of Service (LOS)	
	From	To	2028 Conditions without Project	2028 Conditions with Proposed Project
Bonita Beach Rd	I-75	Bonita Grande Dr	C	C

Conclusion

Based on the roadway link and intersection Level of Service analyses conducted for both the Comprehensive Plan Amendment and rezoning requests, Bonita Beach Road and the surrounding network is anticipated to operate at or better than the adopted LOS standard in project's build-out year (2028).

ATTACHMENT O

Barraco and Associates, Inc.
www.barraco.net
Civil Engineers, Land Surveyors and Planners

White Willow
STORMWATER NARRATIVE

The White Willow project is located in Bonita Springs, Florida, on a site that has been previously cleared and improved. The property includes two man-made lakes that currently serve as depressional storage areas. The majority of the site is relatively flat, and stormwater runoff generally follows two primary drainage patterns. The northern portion of the site conveys runoff into the existing lakes, which discharge through a pipe system connected to a shallow swale near the north property line. This swale flattens in the northwest corner of the site, where stormwater sheet flows across adjacent property toward Kehl Canal. Kehl Canal flows west and ultimately discharges into the Imperial River, which continues west to Estero Bay. The southern portion of the site sheet flows toward existing roadside ditches along Bonita Beach Road, which also convey westward and converge with Kehl Canal before reaching the Imperial River.

The proposed stormwater management system will incorporate the existing man-made lakes, which account for approximately 25 percent of the project area and provide substantial storage, attenuation, and water quality benefits. The system is designed to closely mimic existing conditions and maintain historical discharge locations, consistent with the requirements of the South Florida Water Management District (SFWMD) which will review the project. The proposed system will capture, attenuate, and treat stormwater runoff for all rainfall events up to the 25-year, 3-day storm event. Attenuated stormwater will be directed to the existing discharge point at the northwest corner of the property, preserving the natural drainage pattern.

To meet state water quality standards and nutrient removal requirements, the proposed system will implement Best Management Practices (BMPs) such as maintaining permanent pool volume and increased residence time for settling, establishing littoral plantings to enhance nutrient uptake, and incorporating stormwater harvesting for irrigation reuse. These measures will ensure compliance with regulatory requirements while providing long-term environmental benefits.

The project site is not located within a FEMA-designated flood zone, and no adverse floodplain impacts are anticipated as a result of the proposed development. The stormwater management system has been designed to maintain existing drainage patterns and discharge locations, ensuring that downstream properties and receiving waters are not negatively affected.

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ATTACHMENT P

WHITE WILLOW

INTEGRATED MODEL ANALYSIS FOR SURFACE AND GROUNDWATER RESOURCES

PREPARED BY
PETER A. BROWN, P.E.
RESPEC
6561 Palmer Park Circle, Suite D
Sarasota, FL 34238

PREPARED FOR
PULTE HOME CORPORATION
24311 Walden Center Drive, Suite 300
Bonita Springs, FL 34134

DECEMBER 2025

Project Number W0084.25006

RESPEC.COM

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5. Existing LIDAR DEM Topography
6. ECM Schematic and Mesh Network
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8. Proposed LIDAR DEM Topography
9. PCM Schematic and Mesh Network

Appendix A

Green-Ampt Soil Parameters

Appendix B

ECM Input/Output Reports

Appendix C

PCM Input/Output Reports

WHITE WILLOW

1.0 BACKGROUND

RESPEC Company, LLC was engaged by Pulte Home Corporation (Client) to prepare an integrated groundwater / surface water model to assess pre- and posft- development groundwater recharge relating to the proposed White Willow project in Lee County, FL. The integrated model is a requirement of The Lee Plan Policy 33.1.7 which states that impacts of proposed land use disturbances within the Density Reduction-Groundwater Resource (DR/GR) area will be analyzed by means of an integrated surface and groundwater model that utilizes site-specific data to assess potential adverse impacts on water resources and natural systems. The Project Area is located along Bonita Beach Road and encompasses a total of 47 acres (AC) as shown on **Figures 1 and 2**. Please note that where appropriate, input data used in the integrated model is consistent with the stormwater design parameters utilized by the Engineer of Record (Barraco and Associates, Inc.).

2.0 EXISTING CONDITIONS

ICPR Version 4.07.08 software was used to compare existing and proposed conditions for the project to demonstrate that no adverse impacts on water resources are anticipated to occur. As described below, the Existing Conditions Model (ECM) utilizes soil and landuse parameters obtained from the Southern Lee County (SLC) ICPR regional model developed by Streamline Technologies.

2.1 EXISTING LANDUSE

RESPEC utilized the Florida Land Use Cover and Classification System to characterize the existing land use conditions for the site. As shown in **Figure 3**, the site consists primarily of Herbaceous (Dry Prairie) (3100), Reservoirs (5300), and Wetland Hardwood Forest (617). Impervious coverages associated with each land use type were obtained from the SLC regional model and are provided in **Table 1** below. Review of historic aerial imagery indicates that the onsite reservoir features were constructed prior to 1984.

Table 1. ECM Impervious Coverage

Land Cover Zone	% Impervious	%DCIA	%Direct
Residential, Low Density	38	20	0
Residential, High Density	72	55	0
Commercial and Services	85	70	0
Recreational	10	0	0
Herbaceous (Dry Prairie)	0	0	0
Reservoirs	0	0	0
Wetland Hardwood Forests	0	0	0
Wetland Coniferous Forests	0	0	0

2.2 EXISTING SOILS

Natural Resources Conservation Service (NRCS) soils are depicted on **Figure 4**. As shown, the predominant soils within the project area are *Pompano fine sand, frequently ponded, 0 to 1 percent slopes* and *Immokalee sand, 0 to 2 percent slopes*, both of which are described by the NRCS as being poorly drained soils with a high runoff potential. Corresponding Green-Ampt soil parameters were obtained from the SLC regional model and incorporated into RESPEC's ECM. The parameters are provided in **Appendix A**.

2.3 EXISTING TOPOGRAPHY AND DRAINAGE

Lee County's 2018 LIDAR Digital Elevation Model (DEM) was used for topographic characterization of the site. Land surface elevations within the Project Area generally range from approximately 11.5-ft to 14.5-ft NAVD88. In addition, bathymetry of the existing reservoirs indicates an average bottom elevation of approximately 3-ft NAVD88.

The site is within WBID No. 3258EE (Kehl Canal) which is part of the Estero Bay Planning Unit. WBID 3258EE is not identified as an impaired water body by the Florida Department of Environmental Protection (FDEP). The Kehl Canal is located approximately 1,400-ft north of the Project Area.

2.4 RAINFALL AND EVAPOTRANSPIRATION

Consistent with the SLC model, RESPEC's ECM performs a continuous simulation of rainfall for 2017. Daily rainfall is based on historic NEXRAD data (Pixel 55336) obtained from the SLC regional model and includes precipitation associated with Hurricane Irma which significantly impacted Lee County in early September of 2017. The ECM also utilizes reference evapotranspiration (ET) data previously included in the SLC model. The corresponding lookup table for ET Crop Coefficients for each landuse type is provided in **Table 2**.

Table 2. ECM Evapotranspiration Crop Coefficients

Land Cover Zone	Crop Coefficient	Root Depth (ft)
Residential, Low Density	1	1.5
Residential, High Density	1	1.5
Commercial and Services	1	1.5
Recreational	1	1.5
Herbaceous (Dry Prairie)	0.7	2
Reservoirs	1	1.5
Wetland Hardwood Forests	0.7	3
Wetland Coniferous Forests	0.7	3

2.5 BOUNDARY CONDITION

RESPEC relied on 2017 time-stage data for Kehl Canal Node NF00102017 taken from the SLC regional model prepared by Streamline Technologies.

2.6 ECM SCHEMATIC

2D Overland Flow and Groundwater Flow Regions serve as the basis for the ECM and are driven by triangulation, diamond, and honeycomb mesh networks that enable the accumulation and conveyance of stormwater runoff. A Mapped Basin Feature was included in the Overland Flow Region to integrate traditional hydrology within the Project Area with the 2D Groundwater Flow Region. In addition, Pond Control Volumes containing overland and groundwater breakpoint patterns were created for the onsite reservoirs to facilitate interaction of surface water and groundwater at these locations.

Overland Weirs were created that allow the site to discharge to the offsite boundary condition (Kehl Canal). Corresponding weir cross sections are based on the 2018 Lee County LIDAR DEM. A schematic map for the ECM is depicted on **Figure 6** and ICPR model input/output reports are provided in **Appendix B**.

3.0 PROPOSED CONDITIONS

The proposed improvements are depicted in the Preliminary Site Plan prepared by the EOR and include the development of 94 residential lots served by a series of local and connector roads. As shown, some filling of the existing reservoir perimeters will occur to accommodate the buildout of the lots. Stormwater runoff generated by the proposed development will be conveyed to the existing reservoir features which will provide full stormwater retention.

To evaluate the effects of the Preliminary Site Plan, RESPEC prepared a Proposed Conditions Model (PCM) that incorporates the improvements into the ECM. The results of the PCM were then compared against the baseline conditions simulated in the ECM to assess impacts on water resources, specifically relating to groundwater recharge. In preparing the PCM, no changes were made to the soil types, rainfall/ET distributions, or boundary conditions and the PCM was also utilized to simulate weather conditions for 2017.

3.1 PROPOSED LANDUSE

The landuse layer utilized in the PCM was updated to reflect the proposed Site Plan including build-out of residential lots and streets and reconfiguration of existing reservoirs. The proposed landuse layer shown in **Figure 7** was imported into the PCM and utilized for roughness, impervious, and ET parameterization. Please note that an impervious coverage of 45% was utilized for the residential tracts as shown in **Table 3**. In addition, onsite roadways were assumed to be 100% directly connected impervious area (DCIA). The total impervious area associated with the Project equates to 18.3 AC.

Table 3. PCM Impervious Coverage

Land Cover Zone	% Impervious	%DCIA	%Direct
Residential, Low Density	38	20	0
Residential, High Density	72	55	0
Commercial and Services	85	70	0
Recreational	10	0	0
Herbaceous (Dry Prairie)	0	0	0
Reservoirs	0	0	0
Wetland Hardwood Forests	0	0	0
Wetland Coniferous Forests	0	0	0
Project Lake	0	0	0
Project Road	100	100	0
Project Tract	45	0	0

3.2 PROPOSED TOPOGRAPHY

The 2018 Lee County LIDAR DEM was modified by RESPEC to include the proposed lake configuration and approximate onsite finished grade for terrain characterization. The proposed DEM is depicted in **Figure 8**.

3.3 PROPOSED IRRIGATION

Irrigation requirements for the proposed lawn and landscape areas were determined by the South Florida Water Management District's Blaney Criddle calculator and are shown in **Table 4** below. Please note that daily irrigation depths (inch per day) were calculated by dividing the monthly supplemental irrigation requirements (see 1-in-10 Irrigation row) by the number of days in the corresponding month as demonstrated in **Table 5**.

Table 4. Blaney Criddle Irrigation Requirements for Sprinklered Turf Grass

Calculations	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Average Rainfall (inches)	1.90	2.00	1.50	1.90	4.10	9.40	8.70	8.60	8.40	3.50	1.50	1.50	53.00
Evapotranspiration (inches)	1.86	2.14	3.70	5.11	6.83	7.60	8.05	7.72	6.48	4.92	3.07	2.15	59.63
Average Effective Rainfall (inches)	0.88	0.94	0.79	1.06	2.31	4.91	4.71	4.58	4.19	1.81	0.76	0.72	27.66
1-in-10 Effective Rainfall (inches)	0.74	0.79	0.66	0.89	1.94	4.12	3.96	3.85	3.52	1.52	0.64	0.61	23.24
Average Irrigation (inches)	0.98	1.20	2.91	4.05	4.52	2.69	3.34	3.14	2.29	3.11	2.31	1.43	31.97
1-in-10 Irrigation (inches)	1.12	1.35	3.04	4.22	4.89	3.48	4.09	3.87	2.96	3.40	2.43	1.54	36.39

Table 5. Irrigation Rate Summary

Month	Monthly Irrigation Inch Application Rate	Days	Daily Irrigation Inch Application Rate
January	1.12	31	0.036
February	1.35	28	0.048
March	3.04	31	0.098
April	4.22	30	0.141
May	4.89	31	0.158
June	3.48	30	0.116
July	4.09	31	0.132
August	3.87	31	0.125
September	2.96	30	0.099
October	3.4	31	0.110
November	2.43	30	0.081
December	1.54	31	0.050

Please note that because irrigation quantities will be withdrawn from the confined Sandstone aquifer, the irrigation source in ICPR was set to external as there is minimal interaction between the Water Table Aquifer and the Sandstone.

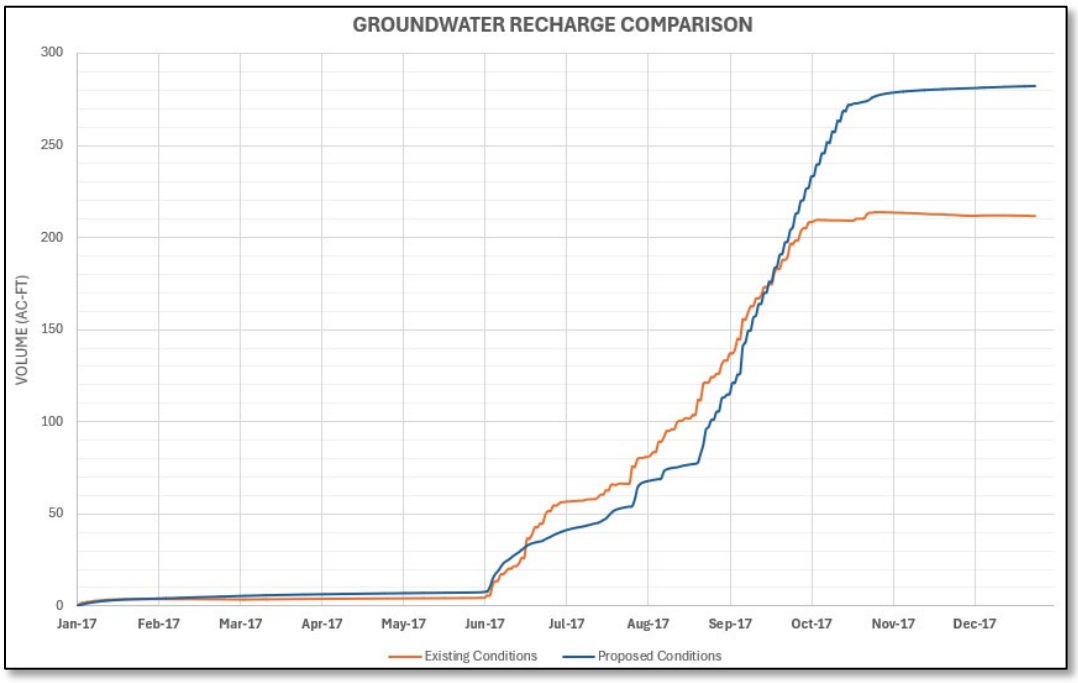
3.4 PROPOSED SCHEMATIC

As previously stated, drainage associated with the residential lots will be conveyed to the two (2) equalized reservoirs via a stormwater collection system. A Mapped Basin Feature was created for the Project Area and two (2) Pond Control Volumes associated with each reservoir were embedded in the Overland Flow Region. Break point patterns were generated internal to each Pond Control Volume to facilitate surface water and groundwater interactions within each of these features. As the reservoirs are intended to provide full retention, no outfall structure was included in the PCM. However, a pipe link was provided between the two ponds for equilibration of water levels. The PCM schematic is depicted on **Figure 9** and model input/output reports are provided in **Appendix C.**

4.0 RESULTS

Based on the results of the ICPR4 integrated analysis for a continuous simulation of 2017 weather conditions, the groundwater recharge volume simulated in the PCM is greater than existing conditions. This result indicates a beneficial increase in recharge to the underlying Water Table Aquifer. The ECM simulates approximately 211.4 ac-ft of groundwater recharge while the PCM simulates 281.9 ac-ft of recharge. The increase in volume equates to 70.5 ac-ft.

A comparison hydrograph is provided below. The results of this integrated analysis demonstrate that over time, the proposed project will enhance water resources by providing a net benefit in groundwater recharge.



FIGURES

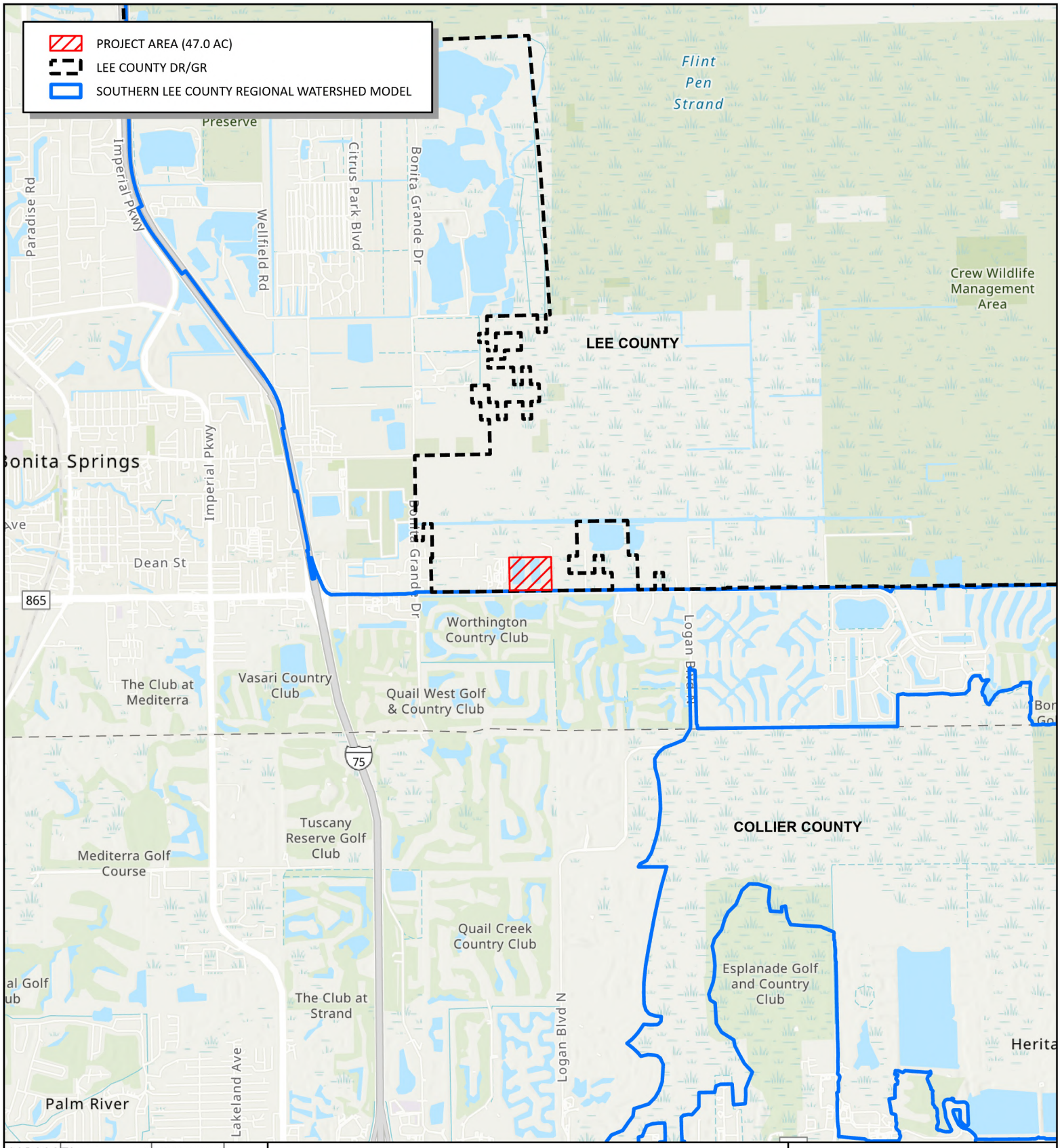


FIGURE 1
GENERAL LOCATION MAP
LEE COUNTY, FL

N

0 2,500 5,000 US Feet

Scale: 1:60,000

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12/08/2025

Image: ESRI WORLD TOPOGRAPHIC MAP

RESPEC





FIGURE 2
AERIAL SITE MAP
LEE COUNTY, FL

N

0 150 300 US Feet

Scale: 1:3,600

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12/08/2025

Image: ESRI WORLD IMAGERY HYBRID

RESPEC

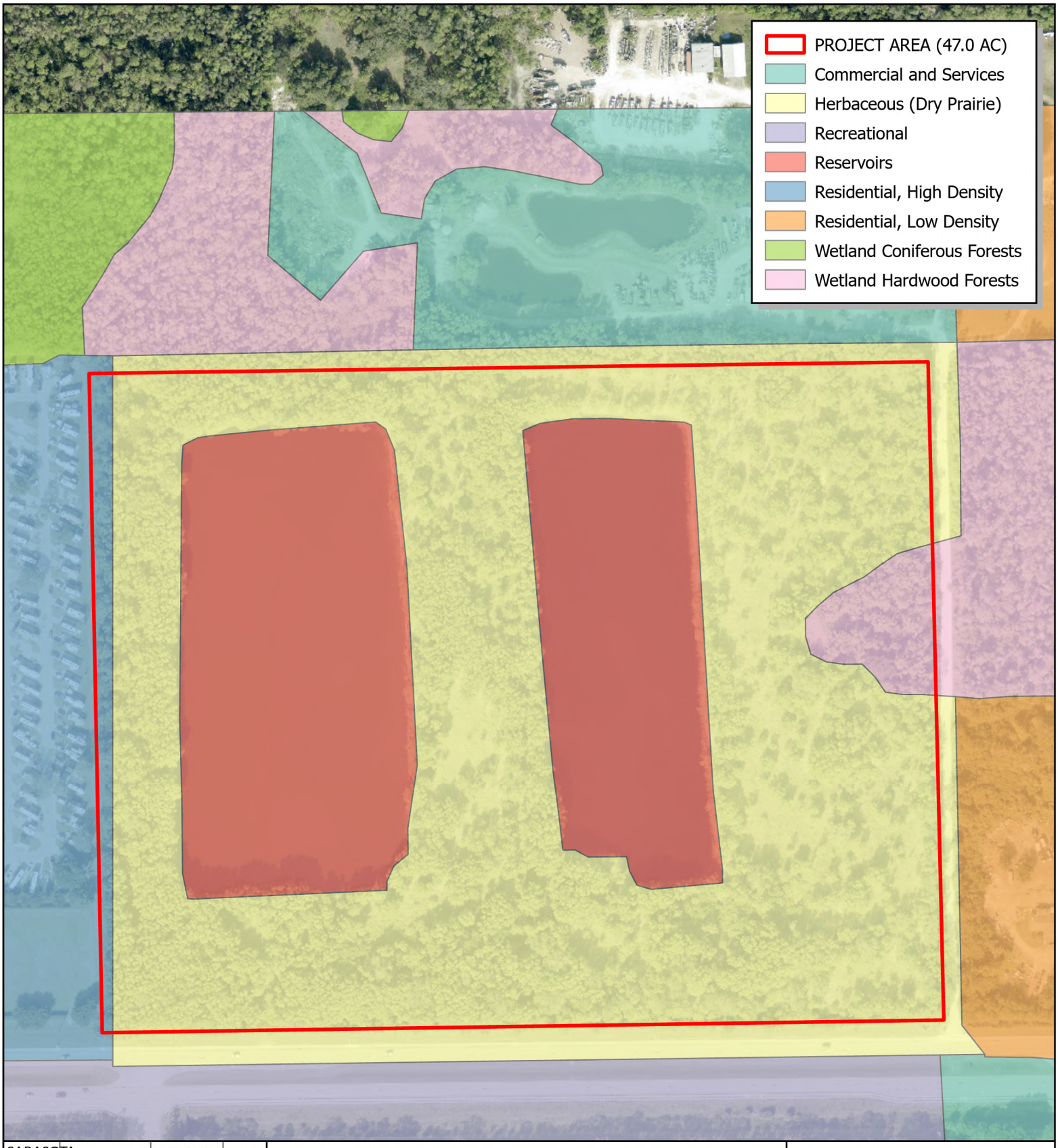




FIGURE 3
EXISTING LANDUSE MAP
LEE COUNTY, FL

N

0 125 250 US Feet

Scale: 1:3,000

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Image: ESRI WORLD IMAGERY HYBRID

RESPEC



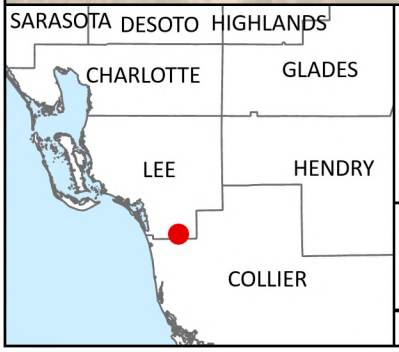


FIGURE 4
NRCS SOILS MAP
LEE COUNTY, FL

N

0 125 250 US Feet

Scale: 1:3,000

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Image: ESRI WORLD IMAGERY

RESPEC

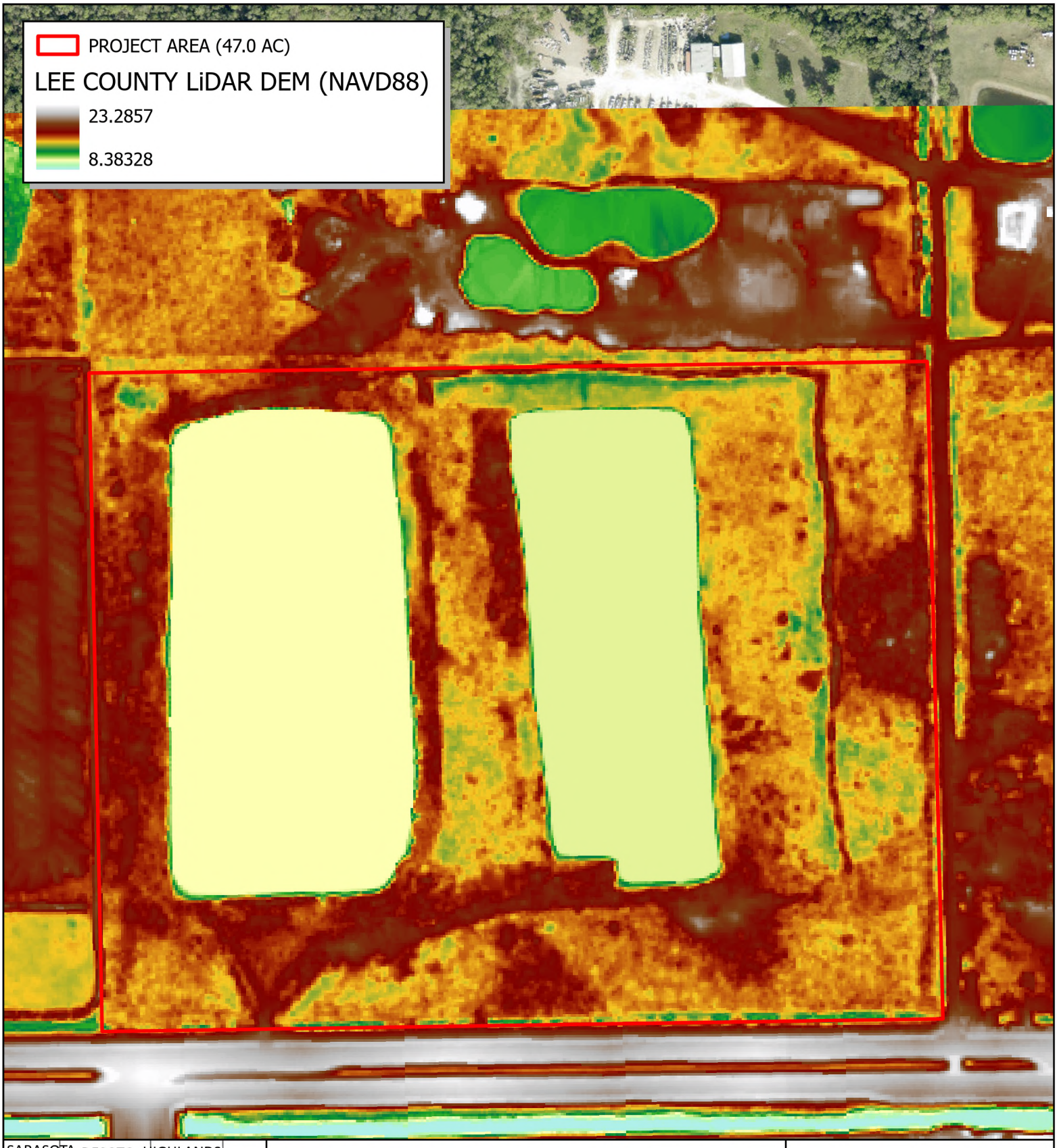




FIGURE 5
LEE COUNTY LiDAR DEM MAP
LEE COUNTY, FL

N

0 125 250 US Feet

Scale: 1:3,000

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Image: ESRI WORLD IMAGERY

RESPEC

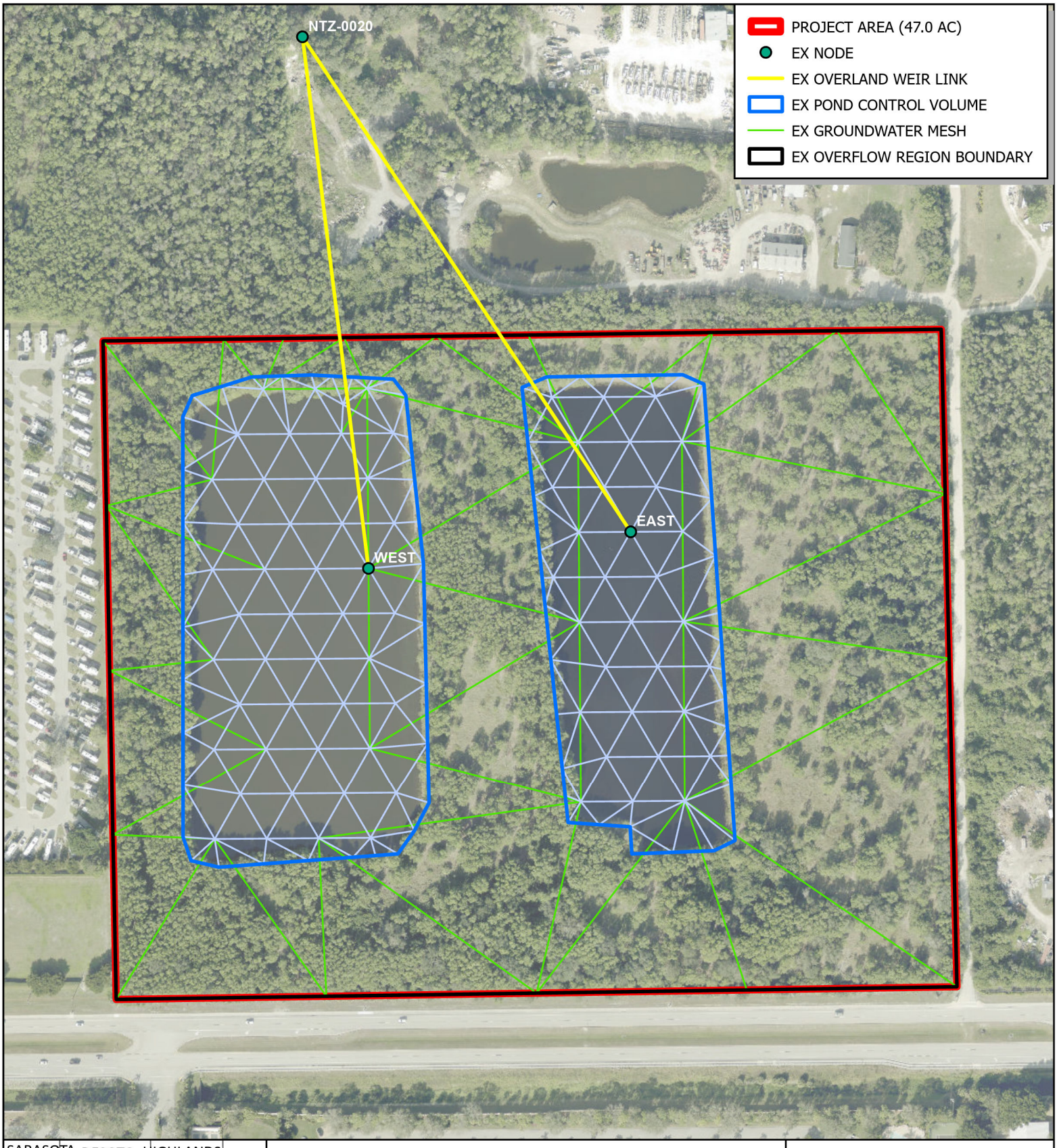




FIGURE 6
ECM SCHEMATIC
LEE COUNTY, FL

N

0 125 250 US Feet

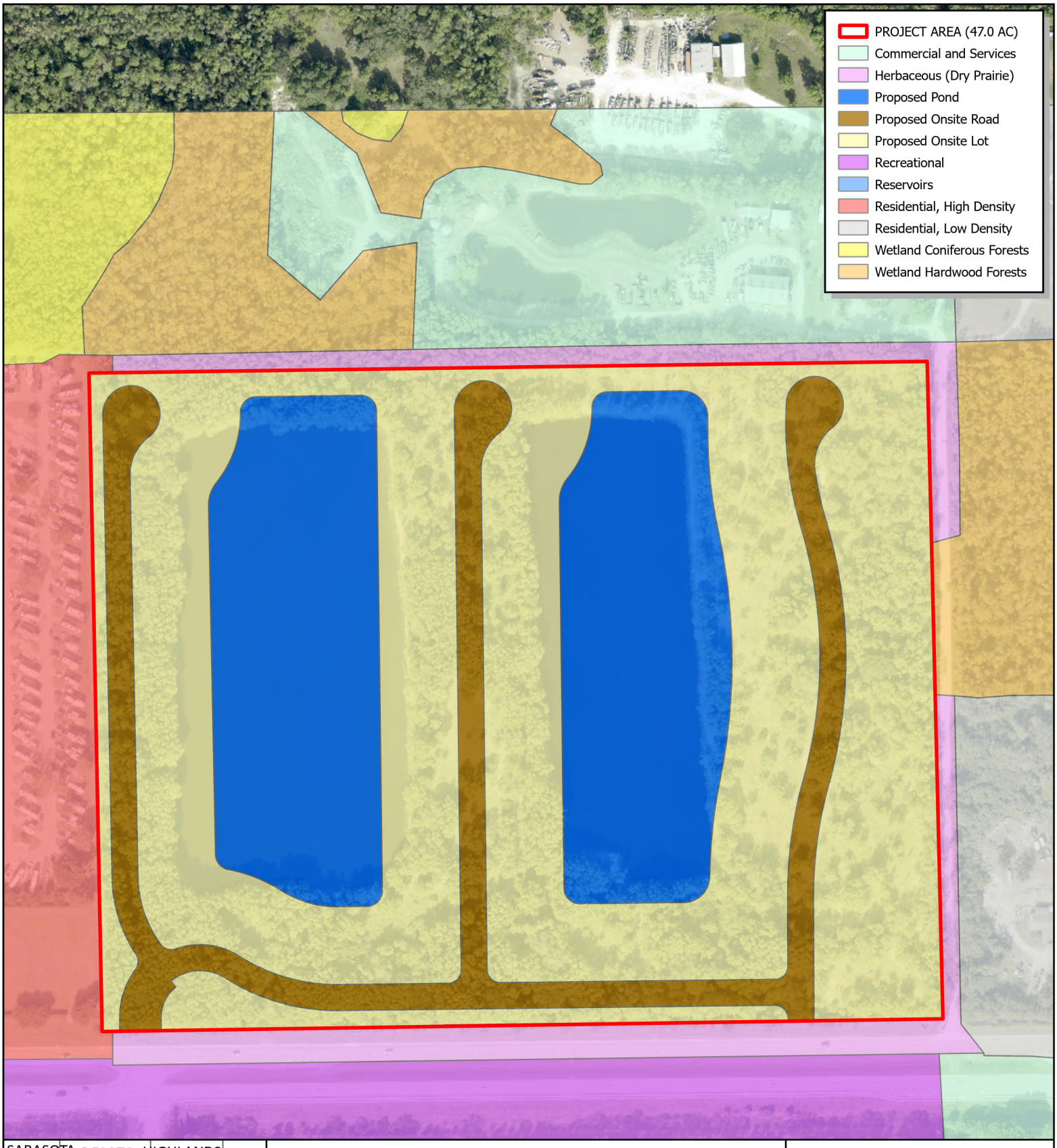
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Image: ESRI WORLD IMAGERY

RESPEC



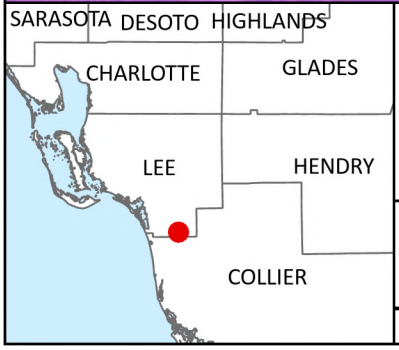


FIGURE 7
PROPOSED LANDUSE MAP
LEE COUNTY, FL

N

0 125 250 US Feet

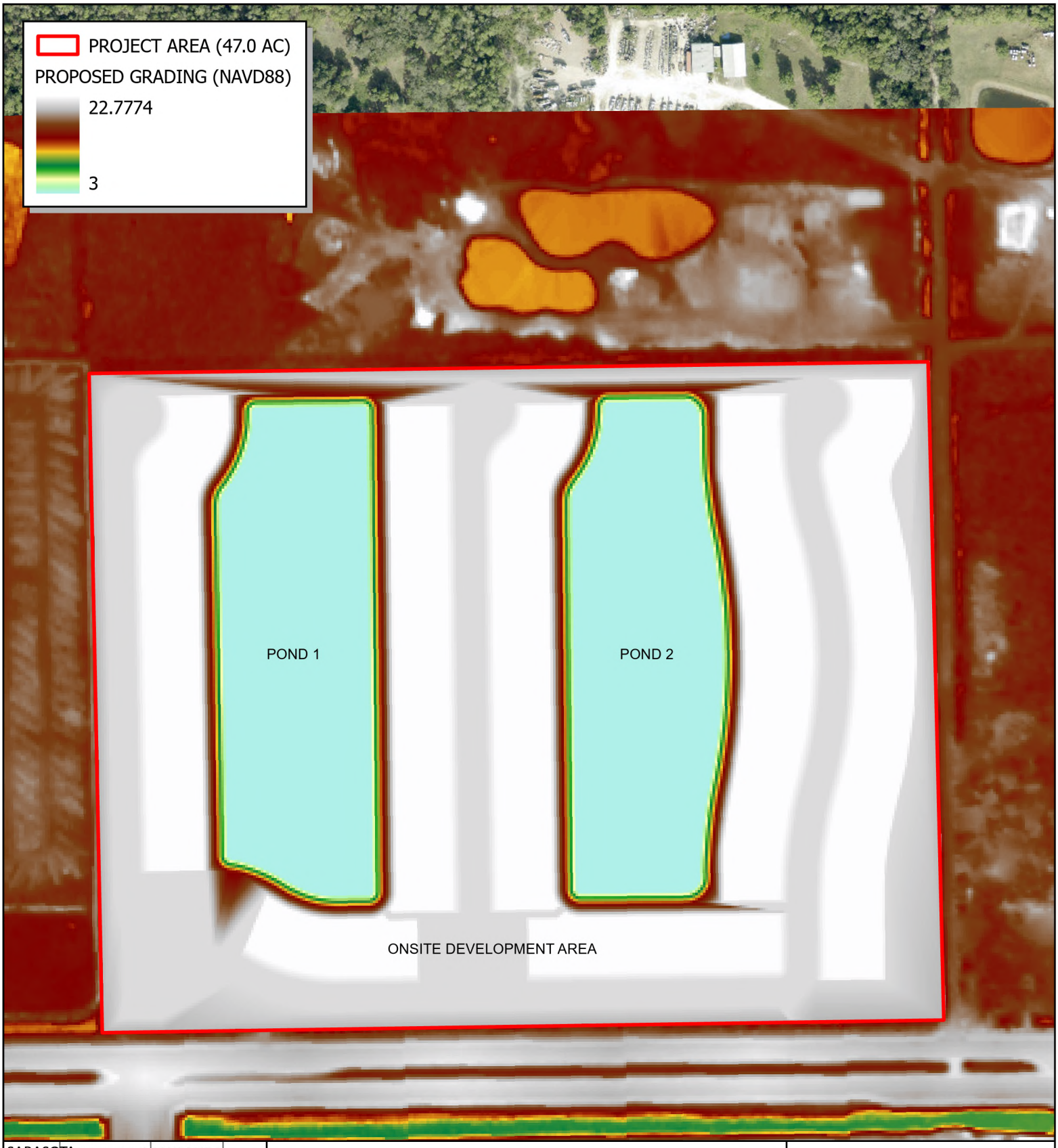
Scale: 1:3,000

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Image: ESRI WORLD IMAGERY HYBRID

RESPEC



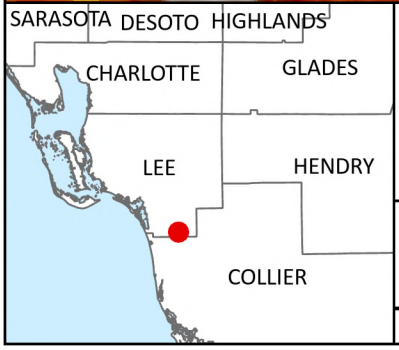


FIGURE 8
PROPOSED LiDAR DEM TOPOGRAPHY
LEE COUNTY, FL

N

0 125 250 US Feet

Scale: 1:3,000

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Image: ESRI WORLD IMAGERY

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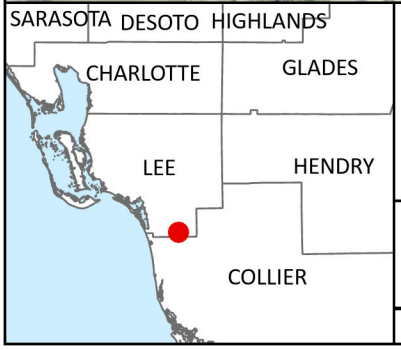


FIGURE 9
PCM SCHEMATIC
LEE COUNTY, FL

N

0 125 250 US Feet

Scale: 1:3,000

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Image: ESRI WORLD IMAGERY

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APPENDIX A
GREEN-AMPT SOIL PARAMETERS

RESPEC

RESPEC.COM

Soil Zone	Name	Kv Saturated (fpd)	MC Saturated	MC Residual	MC Initial	MC Field	MC Wilting	Pore Size Index	Bubble Pressure (in)	Allow Recharge	WT Initial (ft)
1483424	Pompano fine sand, frequently ponded, 0 to 1 percent slopes	13.04	0.383	0.0086	0.14825	0.14825	0.0304	0.6029	1.7599	Groundwater Only	1.51
1483425	Immokalee sand, 0 to 2 percent slopes	10.2	0.366	0.0164	0.1587	0.1587	0.047	0.5938	1.9563	Groundwater Only	2
1483439	Malabar fine sand, frequently ponded, 0 to 1 percent slopes	11.096	0.3552	0.0271	0.18615	0.18615	0.0731	0.5295	2.5552	Groundwater Only	1.51
1483470	Water	11.131	0.4251	0.0304	0.21225	0.21225	0.080925	0.527	1.69	Groundwater Only	0.01
3102899	Pompano fine sand, ponded-Urban land complex, 0 to 1 percent slopes	13.04	0.383	0.0086	0.14825	0.14825	0.0304	0.6029	1.7599	Groundwater Only	1.51
3102952	Immokalee sand-Urban land complex, 0 to 2 percent slopes	10.2	0.366	0.0164	0.1587	0.1587	0.047	0.5938	1.9563	Groundwater Only	2

APPENDIX B
ECM INPUT/OUTPUT REPORTS



Node: EAST

Scenario: Scenario1
Type: Stage/Area
Base Flow: 0.00 cfs
Initial Stage: 8.80 ft
Warning Stage: 0.00 ft

Stage [ft]	Area [ac]	Area [ft2]
3.00	5.5378	241225
3.50	5.6216	244875
4.00	5.7283	249525
4.50	5.8138	253250
5.00	5.9045	257200
5.50	6.0067	261650
6.00	6.0939	265450
6.50	6.1892	269600
7.00	6.2919	274075
7.50	6.3797	277900
8.00	6.4790	282225
8.50	6.5783	286550
9.00	6.6678	290450
9.50	6.7430	293725
10.00	6.7924	295879
10.50	6.8199	297075
11.00	6.8381	297867
11.50	6.8515	298450
12.00	6.8570	298689
12.50	6.8620	298911
13.00	6.8678	299161
13.50	6.8678	299161

Comment:

Node: NTZ-0020

Scenario: Scenario1
Type: Time/Stage
Base Flow: 0.00 cfs
Initial Stage: 8.80 ft
Warning Stage: 0.00 ft
Boundary Stage:

Year	Month	Day	Hour	Stage [ft]
2017	1	1	0.0000	8.80
2017	1	1	6.0000	8.80
2017	1	1	12.0000	8.80
2017	1	1	18.0000	8.80
2017	1	2	0.0000	8.80
2017	1	2	6.0000	8.80
2017	1	2	12.0000	8.80
2017	1	2	18.0000	8.80
2017	1	3	0.0000	8.80
2017	1	3	6.0000	8.80
2017	1	3	12.0000	8.80
2017	1	3	18.0000	8.80
2017	1	4	0.0000	8.80

Year	Month	Day	Hour	Stage [ft]
2017	1	4	6.0000	8.80
2017	1	4	12.0000	8.80
2017	1	4	18.0000	8.80
2017	1	5	0.0000	8.80
2017	1	5	6.0000	8.80
2017	1	5	12.0000	8.80
2017	1	5	18.0000	8.80
2017	1	6	0.0000	8.80
2017	1	6	6.0000	8.80
2017	1	6	12.0000	8.80
2017	1	6	18.0000	8.80
2017	1	7	0.0000	8.80
2017	1	7	6.0000	8.80
2017	1	7	12.0000	8.80
2017	1	7	18.0000	8.80
2017	1	8	0.0000	8.80
2017	1	8	6.0000	8.80
2017	1	8	12.0000	8.80
2017	1	8	18.0000	8.80
2017	1	9	0.0000	8.80
2017	1	9	6.0000	8.80
2017	1	9	12.0000	8.80
2017	1	9	18.0000	8.80
2017	1	10	0.0000	8.80
2017	1	10	6.0000	8.80
2017	1	10	12.0000	8.80
2017	1	10	18.0000	8.80
2017	1	11	0.0000	8.80
2017	1	11	6.0000	8.80
2017	1	11	12.0000	8.80
2017	1	11	18.0000	8.80
2017	1	12	0.0000	8.80
2017	1	12	6.0000	8.80
2017	1	12	12.0000	8.80
2017	1	12	18.0000	8.80
2017	1	13	0.0000	8.80
2017	1	13	6.0000	8.80
2017	1	13	12.0000	8.80
2017	1	13	18.0000	8.80
2017	1	14	0.0000	8.80
2017	1	14	6.0000	8.80
2017	1	14	12.0000	8.79
2017	1	14	18.0000	8.79
2017	1	15	0.0000	8.79
2017	1	15	6.0000	8.79
2017	1	15	12.0000	8.79
2017	1	15	18.0000	8.79
2017	1	16	0.0000	8.79
2017	1	16	6.0000	8.79
2017	1	16	12.0000	8.79
2017	1	16	18.0000	8.79
2017	1	17	0.0000	8.79
2017	1	17	6.0000	8.79
2017	1	17	12.0000	8.79
2017	1	17	18.0000	8.79
2017	1	18	0.0000	8.79

Year	Month	Day	Hour	Stage [ft]
2017	1	18	6.0000	8.79
2017	1	18	12.0000	8.79
2017	1	18	18.0000	8.79
2017	1	19	0.0000	8.79
2017	1	19	6.0000	8.79
2017	1	19	12.0000	8.79
2017	1	19	18.0000	8.79
2017	1	20	0.0000	8.79
2017	1	20	6.0000	8.79
2017	1	20	12.0000	8.79
2017	1	20	18.0000	8.79
2017	1	21	0.0000	8.79
2017	1	21	6.0000	8.79
2017	1	21	12.0000	8.79
2017	1	21	18.0000	8.79
2017	1	22	0.0000	8.79
2017	1	22	6.0000	8.79
2017	1	22	12.0000	8.79
2017	1	22	18.0000	8.79
2017	1	23	0.0000	8.79
2017	1	23	6.0000	8.79
2017	1	23	12.0000	8.80
2017	1	23	18.0000	8.80
2017	1	24	0.0000	8.80
2017	1	24	6.0000	8.80
2017	1	24	12.0000	8.80
2017	1	24	18.0000	8.80
2017	1	25	0.0000	8.80
2017	1	25	6.0000	8.80
2017	1	25	12.0000	8.80
2017	1	25	18.0000	8.80
2017	1	26	0.0000	8.80
2017	1	26	6.0000	8.79
2017	1	26	12.0000	8.79
2017	1	26	18.0000	8.79
2017	1	27	0.0000	8.79
2017	1	27	6.0000	8.79
2017	1	27	12.0000	8.79
2017	1	27	18.0000	8.79
2017	1	28	0.0000	8.79
2017	1	28	6.0000	8.79
2017	1	28	12.0000	8.79
2017	1	28	18.0000	8.79
2017	1	29	0.0000	8.79
2017	1	29	6.0000	8.79
2017	1	29	12.0000	8.79
2017	1	29	18.0000	8.80
2017	1	30	0.0000	8.80
2017	1	30	6.0000	8.80
2017	1	30	12.0000	8.80
2017	1	30	18.0000	8.80
2017	1	31	0.0000	8.80
2017	1	31	6.0000	8.80
2017	1	31	12.0000	8.80
2017	1	31	18.0000	8.80
2017	2	1	0.0000	8.80

Year	Month	Day	Hour	Stage [ft]
2017	2	1	6.0000	8.80
2017	2	1	12.0000	8.80
2017	2	1	18.0000	8.80
2017	2	2	0.0000	8.80
2017	2	2	6.0000	8.80
2017	2	2	12.0000	8.80
2017	2	2	18.0000	8.79
2017	2	3	0.0000	8.79
2017	2	3	6.0000	8.79
2017	2	3	12.0000	8.79
2017	2	3	18.0000	8.79
2017	2	4	0.0000	8.79
2017	2	4	6.0000	8.79
2017	2	4	12.0000	8.79
2017	2	4	18.0000	8.79
2017	2	5	0.0000	8.79
2017	2	5	6.0000	8.79
2017	2	5	12.0000	8.79
2017	2	5	18.0000	8.79
2017	2	6	0.0000	8.79
2017	2	6	6.0000	8.79
2017	2	6	12.0000	8.79
2017	2	6	18.0000	8.79
2017	2	7	0.0000	8.79
2017	2	7	6.0000	8.79
2017	2	7	12.0000	8.79
2017	2	7	18.0000	8.79
2017	2	8	0.0000	8.79
2017	2	8	6.0000	8.79
2017	2	8	12.0000	8.79
2017	2	8	18.0000	8.79
2017	2	9	0.0000	8.79
2017	2	9	6.0000	8.79
2017	2	9	12.0000	8.79
2017	2	9	18.0000	8.79
2017	2	10	0.0000	8.79
2017	2	10	6.0000	8.79
2017	2	10	12.0000	8.79
2017	2	10	18.0000	8.79
2017	2	11	0.0000	8.79
2017	2	11	6.0000	8.79
2017	2	11	12.0000	8.79
2017	2	11	18.0000	8.79
2017	2	12	0.0000	8.79
2017	2	12	6.0000	8.79
2017	2	12	12.0000	8.79
2017	2	12	18.0000	8.79
2017	2	13	0.0000	8.79
2017	2	13	6.0000	8.79
2017	2	13	12.0000	8.79
2017	2	13	18.0000	8.79
2017	2	14	0.0000	8.79
2017	2	14	6.0000	8.79
2017	2	14	12.0000	8.79
2017	2	14	18.0000	8.79
2017	2	15	0.0000	8.79

Year	Month	Day	Hour	Stage [ft]
2017	2	15	6.0000	8.79
2017	2	15	12.0000	8.79
2017	2	15	18.0000	8.79
2017	2	16	0.0000	8.79
2017	2	16	6.0000	8.79
2017	2	16	12.0000	8.79
2017	2	16	18.0000	8.79
2017	2	17	0.0000	8.79
2017	2	17	6.0000	8.79
2017	2	17	12.0000	8.79
2017	2	17	18.0000	8.79
2017	2	18	0.0000	8.79
2017	2	18	6.0000	8.79
2017	2	18	12.0000	8.79
2017	2	18	18.0000	8.79
2017	2	19	0.0000	8.79
2017	2	19	6.0000	8.79
2017	2	19	12.0000	8.79
2017	2	19	18.0000	8.79
2017	2	20	0.0000	8.79
2017	2	20	6.0000	8.79
2017	2	20	12.0000	8.79
2017	2	20	18.0000	8.79
2017	2	21	0.0000	8.79
2017	2	21	6.0000	8.79
2017	2	21	12.0000	8.79
2017	2	21	18.0000	8.79
2017	2	22	0.0000	8.79
2017	2	22	6.0000	8.79
2017	2	22	12.0000	8.79
2017	2	22	18.0000	8.79
2017	2	23	0.0000	8.79
2017	2	23	6.0000	8.79
2017	2	23	12.0000	8.79
2017	2	23	18.0000	8.79
2017	2	24	0.0000	8.79
2017	2	24	6.0000	8.79
2017	2	24	12.0000	8.79
2017	2	24	18.0000	8.79
2017	2	25	0.0000	8.79
2017	2	25	6.0000	8.79
2017	2	25	12.0000	8.79
2017	2	25	18.0000	8.79
2017	2	26	0.0000	8.79
2017	2	26	6.0000	8.79
2017	2	26	12.0000	8.79
2017	2	26	18.0000	8.79
2017	2	27	0.0000	8.79
2017	2	27	6.0000	8.79
2017	2	27	12.0000	8.79
2017	2	27	18.0000	8.79
2017	2	28	0.0000	8.79
2017	2	28	6.0000	8.79
2017	2	28	12.0000	8.79
2017	2	28	18.0000	8.79
2017	3	1	0.0000	8.79

Year	Month	Day	Hour	Stage [ft]
2017	3	1	6.0000	8.79
2017	3	1	12.0000	8.79
2017	3	1	18.0000	8.79
2017	3	2	0.0000	8.79
2017	3	2	6.0000	8.79
2017	3	2	12.0000	8.79
2017	3	2	18.0000	8.79
2017	3	3	0.0000	8.79
2017	3	3	6.0000	8.79
2017	3	3	12.0000	8.79
2017	3	3	18.0000	8.79
2017	3	4	0.0000	8.79
2017	3	4	6.0000	8.79
2017	3	4	12.0000	8.79
2017	3	4	18.0000	8.79
2017	3	5	0.0000	8.79
2017	3	5	6.0000	8.79
2017	3	5	12.0000	8.79
2017	3	5	18.0000	8.79
2017	3	6	0.0000	8.79
2017	3	6	6.0000	8.79
2017	3	6	12.0000	8.79
2017	3	6	18.0000	8.79
2017	3	7	0.0000	8.79
2017	3	7	6.0000	8.79
2017	3	7	12.0000	8.79
2017	3	7	18.0000	8.79
2017	3	8	0.0000	8.79
2017	3	8	6.0000	8.79
2017	3	8	12.0000	8.79
2017	3	8	18.0000	8.79
2017	3	9	0.0000	8.79
2017	3	9	6.0000	8.79
2017	3	9	12.0000	8.79
2017	3	9	18.0000	8.79
2017	3	10	0.0000	8.79
2017	3	10	6.0000	8.79
2017	3	10	12.0000	8.79
2017	3	10	18.0000	8.79
2017	3	11	0.0000	8.79
2017	3	11	6.0000	8.79
2017	3	11	12.0000	8.79
2017	3	11	18.0000	8.79
2017	3	12	0.0000	8.79
2017	3	12	6.0000	8.79
2017	3	12	12.0000	8.79
2017	3	12	18.0000	8.79
2017	3	13	0.0000	8.79
2017	3	13	6.0000	8.79
2017	3	13	12.0000	8.79
2017	3	13	18.0000	8.79
2017	3	14	0.0000	8.79
2017	3	14	6.0000	8.79
2017	3	14	12.0000	8.79
2017	3	14	18.0000	8.79
2017	3	15	0.0000	8.79

Year	Month	Day	Hour	Stage [ft]
2017	3	15	6.0000	8.79
2017	3	15	12.0000	8.79
2017	3	15	18.0000	8.79
2017	3	16	0.0000	8.79
2017	3	16	6.0000	8.79
2017	3	16	12.0000	8.79
2017	3	16	18.0000	8.79
2017	3	17	0.0000	8.79
2017	3	17	6.0000	8.79
2017	3	17	12.0000	8.79
2017	3	17	18.0000	8.79
2017	3	18	0.0000	8.79
2017	3	18	6.0000	8.79
2017	3	18	12.0000	8.79
2017	3	18	18.0000	8.79
2017	3	19	0.0000	8.79
2017	3	19	6.0000	8.79
2017	3	19	12.0000	8.79
2017	3	19	18.0000	8.79
2017	3	20	0.0000	8.79
2017	3	20	6.0000	8.79
2017	3	20	12.0000	8.79
2017	3	20	18.0000	8.79
2017	3	21	0.0000	8.79
2017	3	21	6.0000	8.79
2017	3	21	12.0000	8.79
2017	3	21	18.0000	8.79
2017	3	22	0.0000	8.79
2017	3	22	6.0000	8.79
2017	3	22	12.0000	8.79
2017	3	22	18.0000	8.79
2017	3	23	0.0000	8.79
2017	3	23	6.0000	8.79
2017	3	23	12.0000	8.79
2017	3	23	18.0000	8.79
2017	3	24	0.0000	8.79
2017	3	24	6.0000	8.79
2017	3	24	12.0000	8.79
2017	3	24	18.0000	8.79
2017	3	25	0.0000	8.79
2017	3	25	6.0000	8.79
2017	3	25	12.0000	8.79
2017	3	25	18.0000	8.79
2017	3	26	0.0000	8.79
2017	3	26	6.0000	8.79
2017	3	26	12.0000	8.79
2017	3	26	18.0000	8.79
2017	3	27	0.0000	8.79
2017	3	27	6.0000	8.79
2017	3	27	12.0000	8.79
2017	3	27	18.0000	8.79
2017	3	28	0.0000	8.79
2017	3	28	6.0000	8.79
2017	3	28	12.0000	8.79
2017	3	28	18.0000	8.79
2017	3	29	0.0000	8.79

Year	Month	Day	Hour	Stage [ft]
2017	3	29	6.0000	8.79
2017	3	29	12.0000	8.79
2017	3	29	18.0000	8.79
2017	3	30	0.0000	8.79
2017	3	30	6.0000	8.79
2017	3	30	12.0000	8.79
2017	3	30	18.0000	8.79
2017	3	31	0.0000	8.79
2017	3	31	6.0000	8.79
2017	3	31	12.0000	8.79
2017	3	31	18.0000	8.79
2017	4	1	0.0000	8.79
2017	4	1	6.0000	8.79
2017	4	1	12.0000	8.79
2017	4	1	18.0000	8.79
2017	4	2	0.0000	8.79
2017	4	2	6.0000	8.79
2017	4	2	12.0000	8.79
2017	4	2	18.0000	8.79
2017	4	3	0.0000	8.79
2017	4	3	6.0000	8.79
2017	4	3	12.0000	8.79
2017	4	3	18.0000	8.79
2017	4	4	0.0000	8.79
2017	4	4	6.0000	8.79
2017	4	4	12.0000	8.79
2017	4	4	18.0000	8.79
2017	4	5	0.0000	8.79
2017	4	5	6.0000	8.79
2017	4	5	12.0000	8.79
2017	4	5	18.0000	8.79
2017	4	6	0.0000	8.79
2017	4	6	6.0000	8.79
2017	4	6	12.0000	8.79
2017	4	6	18.0000	8.79
2017	4	7	0.0000	8.79
2017	4	7	6.0000	8.79
2017	4	7	12.0000	8.79
2017	4	7	18.0000	8.79
2017	4	8	0.0000	8.79
2017	4	8	6.0000	8.79
2017	4	8	12.0000	8.79
2017	4	8	18.0000	8.79
2017	4	9	0.0000	8.79
2017	4	9	6.0000	8.79
2017	4	9	12.0000	8.79
2017	4	9	18.0000	8.79
2017	4	10	0.0000	8.79
2017	4	10	6.0000	8.79
2017	4	10	12.0000	8.79
2017	4	10	18.0000	8.79
2017	4	11	0.0000	8.79
2017	4	11	6.0000	8.79
2017	4	11	12.0000	8.79
2017	4	11	18.0000	8.79
2017	4	12	0.0000	8.79

Year	Month	Day	Hour	Stage [ft]
2017	4	12	6.0000	8.79
2017	4	12	12.0000	8.79
2017	4	12	18.0000	8.79
2017	4	13	0.0000	8.79
2017	4	13	6.0000	8.79
2017	4	13	12.0000	8.79
2017	4	13	18.0000	8.79
2017	4	14	0.0000	8.79
2017	4	14	6.0000	8.79
2017	4	14	12.0000	8.79
2017	4	14	18.0000	8.79
2017	4	15	0.0000	8.79
2017	4	15	6.0000	8.79
2017	4	15	12.0000	8.79
2017	4	15	18.0000	8.79
2017	4	16	0.0000	8.79
2017	4	16	6.0000	8.79
2017	4	16	12.0000	8.79
2017	4	16	18.0000	8.79
2017	4	17	0.0000	8.79
2017	4	17	6.0000	8.79
2017	4	17	12.0000	8.79
2017	4	17	18.0000	8.79
2017	4	18	0.0000	8.79
2017	4	18	6.0000	8.79
2017	4	18	12.0000	8.79
2017	4	18	18.0000	8.79
2017	4	19	0.0000	8.79
2017	4	19	6.0000	8.79
2017	4	19	12.0000	8.79
2017	4	19	18.0000	8.79
2017	4	20	0.0000	8.79
2017	4	20	6.0000	8.79
2017	4	20	12.0000	8.79
2017	4	20	18.0000	8.79
2017	4	21	0.0000	8.79
2017	4	21	6.0000	8.79
2017	4	21	12.0000	8.79
2017	4	21	18.0000	8.79
2017	4	22	0.0000	8.79
2017	4	22	6.0000	8.79
2017	4	22	12.0000	8.79
2017	4	22	18.0000	8.79
2017	4	23	0.0000	8.79
2017	4	23	6.0000	8.79
2017	4	23	12.0000	8.79
2017	4	23	18.0000	8.79
2017	4	24	0.0000	8.79
2017	4	24	6.0000	8.79
2017	4	24	12.0000	8.79
2017	4	24	18.0000	8.79
2017	4	25	0.0000	8.79
2017	4	25	6.0000	8.79
2017	4	25	12.0000	8.79
2017	4	25	18.0000	8.79
2017	4	26	0.0000	8.79

Year	Month	Day	Hour	Stage [ft]
2017	4	26	6.0000	8.79
2017	4	26	12.0000	8.79
2017	4	26	18.0000	8.79
2017	4	27	0.0000	8.79
2017	4	27	6.0000	8.79
2017	4	27	12.0000	8.79
2017	4	27	18.0000	8.79
2017	4	28	0.0000	8.79
2017	4	28	6.0000	8.79
2017	4	28	12.0000	8.79
2017	4	28	18.0000	8.79
2017	4	29	0.0000	8.79
2017	4	29	6.0000	8.79
2017	4	29	12.0000	8.79
2017	4	29	18.0000	8.79
2017	4	30	0.0000	8.79
2017	4	30	6.0000	8.79
2017	4	30	12.0000	8.79
2017	4	30	18.0000	8.79
2017	5	1	0.0000	8.79
2017	5	1	6.0000	8.79
2017	5	1	12.0000	8.79
2017	5	1	18.0000	8.79
2017	5	2	0.0000	8.79
2017	5	2	6.0000	8.79
2017	5	2	12.0000	8.79
2017	5	2	18.0000	8.79
2017	5	3	0.0000	8.79
2017	5	3	6.0000	8.79
2017	5	3	12.0000	8.79
2017	5	3	18.0000	8.79
2017	5	4	0.0000	8.79
2017	5	4	6.0000	8.79
2017	5	4	12.0000	8.79
2017	5	4	18.0000	8.79
2017	5	5	0.0000	8.79
2017	5	5	6.0000	8.79
2017	5	5	12.0000	8.79
2017	5	5	18.0000	8.79
2017	5	6	0.0000	8.79
2017	5	6	6.0000	8.79
2017	5	6	12.0000	8.79
2017	5	6	18.0000	8.79
2017	5	7	0.0000	8.79
2017	5	7	6.0000	8.79
2017	5	7	12.0000	8.79
2017	5	7	18.0000	8.79
2017	5	8	0.0000	8.79
2017	5	8	6.0000	8.79
2017	5	8	12.0000	8.79
2017	5	8	18.0000	8.79
2017	5	9	0.0000	8.79
2017	5	9	6.0000	8.79
2017	5	9	12.0000	8.79
2017	5	9	18.0000	8.79
2017	5	10	0.0000	8.79

Year	Month	Day	Hour	Stage [ft]
2017	5	10	6.0000	8.79
2017	5	10	12.0000	8.79
2017	5	10	18.0000	8.79
2017	5	11	0.0000	8.79
2017	5	11	6.0000	8.79
2017	5	11	12.0000	8.79
2017	5	11	18.0000	8.79
2017	5	12	0.0000	8.79
2017	5	12	6.0000	8.79
2017	5	12	12.0000	8.79
2017	5	12	18.0000	8.79
2017	5	13	0.0000	8.79
2017	5	13	6.0000	8.79
2017	5	13	12.0000	8.79
2017	5	13	18.0000	8.79
2017	5	14	0.0000	8.79
2017	5	14	6.0000	8.79
2017	5	14	12.0000	8.79
2017	5	14	18.0000	8.79
2017	5	15	0.0000	8.79
2017	5	15	6.0000	8.79
2017	5	15	12.0000	8.79
2017	5	15	18.0000	8.79
2017	5	16	0.0000	8.79
2017	5	16	6.0000	8.79
2017	5	16	12.0000	8.79
2017	5	16	18.0000	8.79
2017	5	17	0.0000	8.79
2017	5	17	6.0000	8.79
2017	5	17	12.0000	8.79
2017	5	17	18.0000	8.79
2017	5	18	0.0000	8.79
2017	5	18	6.0000	8.79
2017	5	18	12.0000	8.79
2017	5	18	18.0000	8.79
2017	5	19	0.0000	8.79
2017	5	19	6.0000	8.79
2017	5	19	12.0000	8.79
2017	5	19	18.0000	8.79
2017	5	20	0.0000	8.79
2017	5	20	6.0000	8.79
2017	5	20	12.0000	8.79
2017	5	20	18.0000	8.79
2017	5	21	0.0000	8.79
2017	5	21	6.0000	8.79
2017	5	21	12.0000	8.79
2017	5	21	18.0000	8.79
2017	5	22	0.0000	8.79
2017	5	22	6.0000	8.79
2017	5	22	12.0000	8.79
2017	5	22	18.0000	8.79
2017	5	23	0.0000	8.79
2017	5	23	6.0000	8.79
2017	5	23	12.0000	8.79
2017	5	23	18.0000	8.79
2017	5	24	0.0000	8.79

Year	Month	Day	Hour	Stage [ft]
2017	5	24	6.0000	8.79
2017	5	24	12.0000	8.79
2017	5	24	18.0000	8.79
2017	5	25	0.0000	8.79
2017	5	25	6.0000	8.79
2017	5	25	12.0000	8.79
2017	5	25	18.0000	8.79
2017	5	26	0.0000	8.79
2017	5	26	6.0000	8.79
2017	5	26	12.0000	8.79
2017	5	26	18.0000	8.79
2017	5	27	0.0000	8.79
2017	5	27	6.0000	8.79
2017	5	27	12.0000	8.79
2017	5	27	18.0000	8.79
2017	5	28	0.0000	8.79
2017	5	28	6.0000	8.79
2017	5	28	12.0000	8.79
2017	5	28	18.0000	8.79
2017	5	29	0.0000	8.79
2017	5	29	6.0000	8.79
2017	5	29	12.0000	8.79
2017	5	29	18.0000	8.79
2017	5	30	0.0000	8.79
2017	5	30	6.0000	8.79
2017	5	30	12.0000	8.79
2017	5	30	18.0000	8.79
2017	5	31	0.0000	8.79
2017	5	31	6.0000	7.28
2017	5	31	12.0000	4.21
2017	5	31	18.0000	3.23
2017	6	1	0.0000	3.03
2017	6	1	6.0000	2.93
2017	6	1	12.0000	2.85
2017	6	1	18.0000	2.79
2017	6	2	0.0000	2.75
2017	6	2	6.0000	2.71
2017	6	2	12.0000	2.68
2017	6	2	18.0000	2.65
2017	6	3	0.0000	2.63
2017	6	3	6.0000	2.61
2017	6	3	12.0000	2.60
2017	6	3	18.0000	2.59
2017	6	4	0.0000	2.58
2017	6	4	6.0000	2.57
2017	6	4	12.0000	2.57
2017	6	4	18.0000	2.56
2017	6	5	0.0000	2.56
2017	6	5	6.0000	2.55
2017	6	5	12.0000	2.55
2017	6	5	18.0000	2.55
2017	6	6	0.0000	2.55
2017	6	6	6.0000	2.68
2017	6	6	12.0000	4.78
2017	6	6	18.0000	5.71
2017	6	7	0.0000	7.47

Year	Month	Day	Hour	Stage [ft]
2017	6	7	6.0000	7.94
2017	6	7	12.0000	7.74
2017	6	7	18.0000	8.92
2017	6	8	0.0000	9.22
2017	6	8	6.0000	8.94
2017	6	8	12.0000	8.63
2017	6	8	18.0000	8.43
2017	6	9	0.0000	8.22
2017	6	9	6.0000	8.04
2017	6	9	12.0000	7.93
2017	6	9	18.0000	7.84
2017	6	10	0.0000	7.74
2017	6	10	6.0000	7.68
2017	6	10	12.0000	9.97
2017	6	10	18.0000	10.25
2017	6	11	0.0000	10.25
2017	6	11	6.0000	10.24
2017	6	11	12.0000	10.23
2017	6	11	18.0000	10.24
2017	6	12	0.0000	10.24
2017	6	12	6.0000	10.24
2017	6	12	12.0000	10.24
2017	6	12	18.0000	10.25
2017	6	13	0.0000	10.25
2017	6	13	6.0000	10.25
2017	6	13	12.0000	10.26
2017	6	13	18.0000	10.35
2017	6	14	0.0000	10.36
2017	6	14	6.0000	10.37
2017	6	14	12.0000	10.71
2017	6	14	18.0000	10.92
2017	6	15	0.0000	11.02
2017	6	15	6.0000	11.09
2017	6	15	12.0000	11.16
2017	6	15	18.0000	11.42
2017	6	16	0.0000	11.54
2017	6	16	6.0000	11.64
2017	6	16	12.0000	11.74
2017	6	16	18.0000	11.83
2017	6	17	0.0000	11.92
2017	6	17	6.0000	12.01
2017	6	17	12.0000	12.14
2017	6	17	18.0000	12.54
2017	6	18	0.0000	12.63
2017	6	18	6.0000	12.67
2017	6	18	12.0000	12.69
2017	6	18	18.0000	12.76
2017	6	19	0.0000	12.78
2017	6	19	6.0000	12.79
2017	6	19	12.0000	12.96
2017	6	19	18.0000	13.21
2017	6	20	0.0000	13.26
2017	6	20	6.0000	13.27
2017	6	20	12.0000	13.26
2017	6	20	18.0000	13.25
2017	6	21	0.0000	13.23

Year	Month	Day	Hour	Stage [ft]
2017	6	21	6.0000	13.20
2017	6	21	12.0000	13.17
2017	6	21	18.0000	13.14
2017	6	22	0.0000	13.11
2017	6	22	6.0000	13.08
2017	6	22	12.0000	13.04
2017	6	22	18.0000	13.01
2017	6	23	0.0000	12.98
2017	6	23	6.0000	12.95
2017	6	23	12.0000	12.92
2017	6	23	18.0000	12.93
2017	6	24	0.0000	12.91
2017	6	24	6.0000	12.87
2017	6	24	12.0000	12.84
2017	6	24	18.0000	12.81
2017	6	25	0.0000	12.77
2017	6	25	6.0000	12.73
2017	6	25	12.0000	12.69
2017	6	25	18.0000	12.65
2017	6	26	0.0000	12.61
2017	6	26	6.0000	12.57
2017	6	26	12.0000	12.53
2017	6	26	18.0000	12.65
2017	6	27	0.0000	12.87
2017	6	27	6.0000	12.92
2017	6	27	12.0000	12.89
2017	6	27	18.0000	12.84
2017	6	28	0.0000	12.77
2017	6	28	6.0000	12.69
2017	6	28	12.0000	12.61
2017	6	28	18.0000	12.57
2017	6	29	0.0000	12.58
2017	6	29	6.0000	12.56
2017	6	29	12.0000	12.54
2017	6	29	18.0000	12.74
2017	6	30	0.0000	12.76
2017	6	30	6.0000	12.73
2017	6	30	12.0000	12.67
2017	6	30	18.0000	12.68
2017	7	1	0.0000	12.62
2017	7	1	6.0000	12.54
2017	7	1	12.0000	12.46
2017	7	1	18.0000	12.40
2017	7	2	0.0000	12.35
2017	7	2	6.0000	12.28
2017	7	2	12.0000	12.21
2017	7	2	18.0000	12.26
2017	7	3	0.0000	12.18
2017	7	3	6.0000	12.11
2017	7	3	12.0000	12.03
2017	7	3	18.0000	11.99
2017	7	4	0.0000	11.96
2017	7	4	6.0000	11.90
2017	7	4	12.0000	11.84
2017	7	4	18.0000	11.81
2017	7	5	0.0000	11.77

Year	Month	Day	Hour	Stage [ft]
2017	7	5	6.0000	11.72
2017	7	5	12.0000	11.67
2017	7	5	18.0000	11.65
2017	7	6	0.0000	11.62
2017	7	6	6.0000	11.57
2017	7	6	12.0000	11.52
2017	7	6	18.0000	11.54
2017	7	7	0.0000	11.48
2017	7	7	6.0000	11.43
2017	7	7	12.0000	11.37
2017	7	7	18.0000	11.33
2017	7	8	0.0000	11.28
2017	7	8	6.0000	11.23
2017	7	8	12.0000	11.18
2017	7	8	18.0000	11.19
2017	7	9	0.0000	11.16
2017	7	9	6.0000	11.13
2017	7	9	12.0000	11.10
2017	7	9	18.0000	11.09
2017	7	10	0.0000	11.05
2017	7	10	6.0000	11.02
2017	7	10	12.0000	10.99
2017	7	10	18.0000	10.96
2017	7	11	0.0000	10.93
2017	7	11	6.0000	10.90
2017	7	11	12.0000	10.86
2017	7	11	18.0000	10.99
2017	7	12	0.0000	10.98
2017	7	12	6.0000	10.96
2017	7	12	12.0000	10.94
2017	7	12	18.0000	10.97
2017	7	13	0.0000	10.99
2017	7	13	6.0000	10.97
2017	7	13	12.0000	10.95
2017	7	13	18.0000	10.93
2017	7	14	0.0000	10.90
2017	7	14	6.0000	10.87
2017	7	14	12.0000	10.85
2017	7	14	18.0000	11.03
2017	7	15	0.0000	11.02
2017	7	15	6.0000	10.98
2017	7	15	12.0000	10.94
2017	7	15	18.0000	10.90
2017	7	16	0.0000	10.86
2017	7	16	6.0000	10.82
2017	7	16	12.0000	10.78
2017	7	16	18.0000	10.74
2017	7	17	0.0000	10.71
2017	7	17	6.0000	10.67
2017	7	17	12.0000	10.71
2017	7	17	18.0000	10.90
2017	7	18	0.0000	10.90
2017	7	18	6.0000	10.88
2017	7	18	12.0000	10.91
2017	7	18	18.0000	11.32
2017	7	19	0.0000	11.37

Year	Month	Day	Hour	Stage [ft]
2017	7	19	6.0000	11.34
2017	7	19	12.0000	11.43
2017	7	19	18.0000	11.44
2017	7	20	0.0000	11.40
2017	7	20	6.0000	11.36
2017	7	20	12.0000	11.37
2017	7	20	18.0000	11.34
2017	7	21	0.0000	11.30
2017	7	21	6.0000	11.26
2017	7	21	12.0000	11.65
2017	7	21	18.0000	11.62
2017	7	22	0.0000	11.57
2017	7	22	6.0000	11.52
2017	7	22	12.0000	11.67
2017	7	22	18.0000	11.72
2017	7	23	0.0000	11.67
2017	7	23	6.0000	11.60
2017	7	23	12.0000	11.54
2017	7	23	18.0000	11.49
2017	7	24	0.0000	11.44
2017	7	24	6.0000	11.39
2017	7	24	12.0000	11.34
2017	7	24	18.0000	11.29
2017	7	25	0.0000	11.24
2017	7	25	6.0000	11.19
2017	7	25	12.0000	11.14
2017	7	25	18.0000	11.13
2017	7	26	0.0000	11.13
2017	7	26	6.0000	11.12
2017	7	26	12.0000	11.11
2017	7	26	18.0000	11.12
2017	7	27	0.0000	11.10
2017	7	27	6.0000	11.09
2017	7	27	12.0000	11.06
2017	7	27	18.0000	11.02
2017	7	28	0.0000	10.99
2017	7	28	6.0000	10.96
2017	7	28	12.0000	10.93
2017	7	28	18.0000	10.90
2017	7	29	0.0000	10.87
2017	7	29	6.0000	10.83
2017	7	29	12.0000	10.85
2017	7	29	18.0000	10.83
2017	7	30	0.0000	10.80
2017	7	30	6.0000	10.77
2017	7	30	12.0000	10.78
2017	7	30	18.0000	10.81
2017	7	31	0.0000	10.86
2017	7	31	6.0000	11.22
2017	7	31	12.0000	12.04
2017	7	31	18.0000	12.15
2017	8	1	0.0000	12.55
2017	8	1	6.0000	12.91
2017	8	1	12.0000	13.46
2017	8	1	18.0000	13.63
2017	8	2	0.0000	13.79

Year	Month	Day	Hour	Stage [ft]
2017	8	2	6.0000	13.78
2017	8	2	12.0000	13.75
2017	8	2	18.0000	13.71
2017	8	3	0.0000	13.67
2017	8	3	6.0000	13.61
2017	8	3	12.0000	13.54
2017	8	3	18.0000	13.54
2017	8	4	0.0000	13.51
2017	8	4	6.0000	13.47
2017	8	4	12.0000	13.42
2017	8	4	18.0000	13.36
2017	8	5	0.0000	13.29
2017	8	5	6.0000	13.26
2017	8	5	12.0000	13.20
2017	8	5	18.0000	13.21
2017	8	6	0.0000	13.21
2017	8	6	6.0000	13.18
2017	8	6	12.0000	13.13
2017	8	6	18.0000	13.18
2017	8	7	0.0000	13.14
2017	8	7	6.0000	13.07
2017	8	7	12.0000	13.00
2017	8	7	18.0000	12.94
2017	8	8	0.0000	12.88
2017	8	8	6.0000	12.81
2017	8	8	12.0000	12.74
2017	8	8	18.0000	12.71
2017	8	9	0.0000	12.64
2017	8	9	6.0000	12.55
2017	8	9	12.0000	12.46
2017	8	9	18.0000	12.37
2017	8	10	0.0000	12.29
2017	8	10	6.0000	12.21
2017	8	10	12.0000	12.14
2017	8	10	18.0000	12.07
2017	8	11	0.0000	12.27
2017	8	11	6.0000	13.29
2017	8	11	12.0000	13.51
2017	8	11	18.0000	13.50
2017	8	12	0.0000	13.45
2017	8	12	6.0000	13.40
2017	8	12	12.0000	13.33
2017	8	12	18.0000	13.25
2017	8	13	0.0000	13.16
2017	8	13	6.0000	13.07
2017	8	13	12.0000	12.97
2017	8	13	18.0000	12.87
2017	8	14	0.0000	12.77
2017	8	14	6.0000	12.67
2017	8	14	12.0000	12.58
2017	8	14	18.0000	12.53
2017	8	15	0.0000	12.47
2017	8	15	6.0000	12.40
2017	8	15	12.0000	12.33
2017	8	15	18.0000	12.25
2017	8	16	0.0000	12.19

Year	Month	Day	Hour	Stage [ft]
2017	8	16	6.0000	12.13
2017	8	16	12.0000	12.07
2017	8	16	18.0000	12.04
2017	8	17	0.0000	11.97
2017	8	17	6.0000	11.92
2017	8	17	12.0000	11.85
2017	8	17	18.0000	11.92
2017	8	18	0.0000	12.07
2017	8	18	6.0000	12.03
2017	8	18	12.0000	11.96
2017	8	18	18.0000	11.88
2017	8	19	0.0000	11.82
2017	8	19	6.0000	11.75
2017	8	19	12.0000	11.68
2017	8	19	18.0000	11.62
2017	8	20	0.0000	11.55
2017	8	20	6.0000	11.49
2017	8	20	12.0000	11.43
2017	8	20	18.0000	11.44
2017	8	21	0.0000	11.42
2017	8	21	6.0000	11.37
2017	8	21	12.0000	11.32
2017	8	21	18.0000	11.27
2017	8	22	0.0000	11.21
2017	8	22	6.0000	11.16
2017	8	22	12.0000	11.11
2017	8	22	18.0000	11.07
2017	8	23	0.0000	11.02
2017	8	23	6.0000	10.98
2017	8	23	12.0000	10.93
2017	8	23	18.0000	10.99
2017	8	24	0.0000	10.96
2017	8	24	6.0000	10.93
2017	8	24	12.0000	10.97
2017	8	24	18.0000	11.31
2017	8	25	0.0000	11.36
2017	8	25	6.0000	11.90
2017	8	25	12.0000	12.31
2017	8	25	18.0000	12.29
2017	8	26	0.0000	12.61
2017	8	26	6.0000	12.88
2017	8	26	12.0000	13.20
2017	8	26	18.0000	13.22
2017	8	27	0.0000	13.67
2017	8	27	6.0000	14.08
2017	8	27	12.0000	14.26
2017	8	27	18.0000	14.36
2017	8	28	0.0000	14.44
2017	8	28	6.0000	14.46
2017	8	28	12.0000	14.49
2017	8	28	18.0000	14.48
2017	8	29	0.0000	14.49
2017	8	29	6.0000	14.47
2017	8	29	12.0000	14.44
2017	8	29	18.0000	14.41
2017	8	30	0.0000	14.38

Year	Month	Day	Hour	Stage [ft]
2017	8	30	6.0000	14.34
2017	8	30	12.0000	14.29
2017	8	30	18.0000	14.25
2017	8	31	0.0000	14.20
2017	8	31	6.0000	14.15
2017	8	31	12.0000	14.09
2017	8	31	18.0000	14.02
2017	9	1	0.0000	13.95
2017	9	1	6.0000	13.88
2017	9	1	12.0000	13.80
2017	9	1	18.0000	13.91
2017	9	2	0.0000	13.90
2017	9	2	6.0000	13.99
2017	9	2	12.0000	14.00
2017	9	2	18.0000	13.97
2017	9	3	0.0000	13.94
2017	9	3	6.0000	13.89
2017	9	3	12.0000	13.84
2017	9	3	18.0000	13.79
2017	9	4	0.0000	13.71
2017	9	4	6.0000	13.63
2017	9	4	12.0000	13.54
2017	9	4	18.0000	13.44
2017	9	5	0.0000	13.34
2017	9	5	6.0000	13.23
2017	9	5	12.0000	13.12
2017	9	5	18.0000	13.06
2017	9	6	0.0000	13.05
2017	9	6	6.0000	13.00
2017	9	6	12.0000	12.94
2017	9	6	18.0000	12.87
2017	9	7	0.0000	12.81
2017	9	7	6.0000	12.74
2017	9	7	12.0000	12.67
2017	9	7	18.0000	12.68
2017	9	8	0.0000	12.77
2017	9	8	6.0000	12.73
2017	9	8	12.0000	12.67
2017	9	8	18.0000	12.60
2017	9	9	0.0000	12.53
2017	9	9	6.0000	12.46
2017	9	9	12.0000	12.39
2017	9	9	18.0000	12.49
2017	9	10	0.0000	13.13
2017	9	10	6.0000	13.38
2017	9	10	12.0000	13.89
2017	9	10	18.0000	14.65
2017	9	11	0.0000	14.82
2017	9	11	6.0000	14.90
2017	9	11	12.0000	14.96
2017	9	11	18.0000	14.98
2017	9	12	0.0000	15.00
2017	9	12	6.0000	15.00
2017	9	12	12.0000	15.00
2017	9	12	18.0000	14.99
2017	9	13	0.0000	14.98

Year	Month	Day	Hour	Stage [ft]
2017	9	13	6.0000	14.97
2017	9	13	12.0000	14.97
2017	9	13	18.0000	14.98
2017	9	14	0.0000	14.98
2017	9	14	6.0000	14.98
2017	9	14	12.0000	14.98
2017	9	14	18.0000	15.00
2017	9	15	0.0000	15.16
2017	9	15	6.0000	15.16
2017	9	15	12.0000	15.16
2017	9	15	18.0000	15.15
2017	9	16	0.0000	15.14
2017	9	16	6.0000	15.13
2017	9	16	12.0000	15.12
2017	9	16	18.0000	15.11
2017	9	17	0.0000	15.10
2017	9	17	6.0000	15.09
2017	9	17	12.0000	15.08
2017	9	17	18.0000	15.06
2017	9	18	0.0000	15.05
2017	9	18	6.0000	15.04
2017	9	18	12.0000	15.02
2017	9	18	18.0000	15.01
2017	9	19	0.0000	14.99
2017	9	19	6.0000	14.98
2017	9	19	12.0000	14.96
2017	9	19	18.0000	14.94
2017	9	20	0.0000	14.93
2017	9	20	6.0000	14.90
2017	9	20	12.0000	14.88
2017	9	20	18.0000	14.86
2017	9	21	0.0000	14.84
2017	9	21	6.0000	14.82
2017	9	21	12.0000	14.79
2017	9	21	18.0000	14.77
2017	9	22	0.0000	14.75
2017	9	22	6.0000	14.73
2017	9	22	12.0000	14.70
2017	9	22	18.0000	14.86
2017	9	23	0.0000	14.84
2017	9	23	6.0000	14.82
2017	9	23	12.0000	14.79
2017	9	23	18.0000	14.78
2017	9	24	0.0000	14.77
2017	9	24	6.0000	14.74
2017	9	24	12.0000	14.71
2017	9	24	18.0000	14.68
2017	9	25	0.0000	14.64
2017	9	25	6.0000	14.60
2017	9	25	12.0000	14.56
2017	9	25	18.0000	14.52
2017	9	26	0.0000	14.48
2017	9	26	6.0000	14.43
2017	9	26	12.0000	14.38
2017	9	26	18.0000	14.33
2017	9	27	0.0000	14.28

Year	Month	Day	Hour	Stage [ft]
2017	9	27	6.0000	14.22
2017	9	27	12.0000	14.16
2017	9	27	18.0000	14.10
2017	9	28	0.0000	14.02
2017	9	28	6.0000	13.94
2017	9	28	12.0000	13.86
2017	9	28	18.0000	13.76
2017	9	29	0.0000	13.81
2017	9	29	6.0000	13.75
2017	9	29	12.0000	13.71
2017	9	29	18.0000	13.88
2017	9	30	0.0000	14.03
2017	9	30	6.0000	14.03
2017	9	30	12.0000	14.01
2017	9	30	18.0000	13.99
2017	10	1	0.0000	13.95
2017	10	1	6.0000	13.90
2017	10	1	12.0000	13.84
2017	10	1	18.0000	13.76
2017	10	2	0.0000	13.67
2017	10	2	6.0000	13.57
2017	10	2	12.0000	13.47
2017	10	2	18.0000	13.43
2017	10	3	0.0000	13.34
2017	10	3	6.0000	13.24
2017	10	3	12.0000	13.15
2017	10	3	18.0000	13.10
2017	10	4	0.0000	13.02
2017	10	4	6.0000	12.94
2017	10	4	12.0000	12.85
2017	10	4	18.0000	12.78
2017	10	5	0.0000	12.70
2017	10	5	6.0000	12.63
2017	10	5	12.0000	12.55
2017	10	5	18.0000	12.49
2017	10	6	0.0000	12.43
2017	10	6	6.0000	12.37
2017	10	6	12.0000	12.30
2017	10	6	18.0000	12.23
2017	10	7	0.0000	12.17
2017	10	7	6.0000	12.10
2017	10	7	12.0000	12.04
2017	10	7	18.0000	11.98
2017	10	8	0.0000	11.92
2017	10	8	6.0000	11.87
2017	10	8	12.0000	11.81
2017	10	8	18.0000	11.75
2017	10	9	0.0000	11.70
2017	10	9	6.0000	11.65
2017	10	9	12.0000	11.59
2017	10	9	18.0000	11.53
2017	10	10	0.0000	11.48
2017	10	10	6.0000	11.43
2017	10	10	12.0000	11.38
2017	10	10	18.0000	11.33
2017	10	11	0.0000	11.28

Year	Month	Day	Hour	Stage [ft]
2017	10	11	6.0000	11.24
2017	10	11	12.0000	11.19
2017	10	11	18.0000	11.14
2017	10	12	0.0000	11.10
2017	10	12	6.0000	11.05
2017	10	12	12.0000	11.01
2017	10	12	18.0000	10.97
2017	10	13	0.0000	10.93
2017	10	13	6.0000	10.89
2017	10	13	12.0000	10.85
2017	10	13	18.0000	10.81
2017	10	14	0.0000	10.77
2017	10	14	6.0000	10.75
2017	10	14	12.0000	10.75
2017	10	14	18.0000	10.76
2017	10	15	0.0000	10.77
2017	10	15	6.0000	10.74
2017	10	15	12.0000	10.71
2017	10	15	18.0000	10.69
2017	10	16	0.0000	10.66
2017	10	16	6.0000	10.62
2017	10	16	12.0000	10.59
2017	10	16	18.0000	10.56
2017	10	17	0.0000	10.69
2017	10	17	6.0000	10.73
2017	10	17	12.0000	10.72
2017	10	17	18.0000	10.70
2017	10	18	0.0000	10.67
2017	10	18	6.0000	10.65
2017	10	18	12.0000	10.62
2017	10	18	18.0000	10.59
2017	10	19	0.0000	10.56
2017	10	19	6.0000	10.52
2017	10	19	12.0000	10.48
2017	10	19	18.0000	10.44
2017	10	20	0.0000	10.39
2017	10	20	6.0000	10.34
2017	10	20	12.0000	10.29
2017	10	20	18.0000	10.24
2017	10	21	0.0000	10.19
2017	10	21	6.0000	10.15
2017	10	21	12.0000	10.11
2017	10	21	18.0000	10.13
2017	10	22	0.0000	10.12
2017	10	22	6.0000	10.10
2017	10	22	12.0000	10.07
2017	10	22	18.0000	10.05
2017	10	23	0.0000	10.02
2017	10	23	6.0000	10.00
2017	10	23	12.0000	9.97
2017	10	23	18.0000	9.96
2017	10	24	0.0000	9.94
2017	10	24	6.0000	9.98
2017	10	24	12.0000	10.28
2017	10	24	18.0000	10.34
2017	10	25	0.0000	10.56

Year	Month	Day	Hour	Stage [ft]
2017	10	25	6.0000	10.59
2017	10	25	12.0000	10.59
2017	10	25	18.0000	10.59
2017	10	26	0.0000	10.57
2017	10	26	6.0000	10.54
2017	10	26	12.0000	10.51
2017	10	26	18.0000	10.48
2017	10	27	0.0000	10.43
2017	10	27	6.0000	10.38
2017	10	27	12.0000	10.32
2017	10	27	18.0000	10.26
2017	10	28	0.0000	10.22
2017	10	28	6.0000	10.18
2017	10	28	12.0000	10.22
2017	10	28	18.0000	10.73
2017	10	29	0.0000	11.02
2017	10	29	6.0000	11.07
2017	10	29	12.0000	11.06
2017	10	29	18.0000	11.04
2017	10	30	0.0000	11.02
2017	10	30	6.0000	10.99
2017	10	30	12.0000	10.96
2017	10	30	18.0000	10.93
2017	10	31	0.0000	10.90
2017	10	31	6.0000	10.86
2017	10	31	12.0000	10.83
2017	10	31	18.0000	10.80
2017	11	1	0.0000	10.76
2017	11	1	6.0000	10.72
2017	11	1	12.0000	10.68
2017	11	1	18.0000	10.64
2017	11	2	0.0000	10.60
2017	11	2	6.0000	10.56
2017	11	2	12.0000	10.51
2017	11	2	18.0000	10.47
2017	11	3	0.0000	10.42
2017	11	3	6.0000	10.37
2017	11	3	12.0000	10.32
2017	11	3	18.0000	10.28
2017	11	4	0.0000	10.25
2017	11	4	6.0000	10.22
2017	11	4	12.0000	10.19
2017	11	4	18.0000	10.17
2017	11	5	0.0000	10.14
2017	11	5	6.0000	10.12
2017	11	5	12.0000	10.10
2017	11	5	18.0000	10.08
2017	11	6	0.0000	10.06
2017	11	6	6.0000	10.04
2017	11	6	12.0000	10.02
2017	11	6	18.0000	10.01
2017	11	7	0.0000	9.99
2017	11	7	6.0000	9.97
2017	11	7	12.0000	9.95
2017	11	7	18.0000	9.94
2017	11	8	0.0000	9.92

Year	Month	Day	Hour	Stage [ft]
2017	11	8	6.0000	9.90
2017	11	8	12.0000	9.89
2017	11	8	18.0000	9.87
2017	11	9	0.0000	9.86
2017	11	9	6.0000	9.84
2017	11	9	12.0000	9.83
2017	11	9	18.0000	9.81
2017	11	10	0.0000	9.80
2017	11	10	6.0000	9.78
2017	11	10	12.0000	9.77
2017	11	10	18.0000	9.75
2017	11	11	0.0000	9.74
2017	11	11	6.0000	9.73
2017	11	11	12.0000	9.71
2017	11	11	18.0000	9.70
2017	11	12	0.0000	9.69
2017	11	12	6.0000	9.67
2017	11	12	12.0000	9.66
2017	11	12	18.0000	9.65
2017	11	13	0.0000	9.66
2017	11	13	6.0000	9.65
2017	11	13	12.0000	9.64
2017	11	13	18.0000	9.63
2017	11	14	0.0000	9.61
2017	11	14	6.0000	9.60
2017	11	14	12.0000	9.59
2017	11	14	18.0000	9.58
2017	11	15	0.0000	9.57
2017	11	15	6.0000	9.56
2017	11	15	12.0000	9.56
2017	11	15	18.0000	9.55
2017	11	16	0.0000	9.54
2017	11	16	6.0000	9.53
2017	11	16	12.0000	9.52
2017	11	16	18.0000	9.51
2017	11	17	0.0000	9.50
2017	11	17	6.0000	9.49
2017	11	17	12.0000	9.48
2017	11	17	18.0000	9.48
2017	11	18	0.0000	9.47
2017	11	18	6.0000	9.46
2017	11	18	12.0000	9.45
2017	11	18	18.0000	9.44
2017	11	19	0.0000	9.43
2017	11	19	6.0000	9.42
2017	11	19	12.0000	9.42
2017	11	19	18.0000	9.41
2017	11	20	0.0000	9.40
2017	11	20	6.0000	9.39
2017	11	20	12.0000	9.38
2017	11	20	18.0000	9.38
2017	11	21	0.0000	9.37
2017	11	21	6.0000	9.36
2017	11	21	12.0000	9.35
2017	11	21	18.0000	9.34
2017	11	22	0.0000	9.34

Year	Month	Day	Hour	Stage [ft]
2017	11	22	6.0000	9.33
2017	11	22	12.0000	9.32
2017	11	22	18.0000	9.32
2017	11	23	0.0000	9.31
2017	11	23	6.0000	9.31
2017	11	23	12.0000	9.30
2017	11	23	18.0000	9.30
2017	11	24	0.0000	9.30
2017	11	24	6.0000	9.30
2017	11	24	12.0000	9.29
2017	11	24	18.0000	9.29
2017	11	25	0.0000	9.28
2017	11	25	6.0000	9.27
2017	11	25	12.0000	9.27
2017	11	25	18.0000	9.26
2017	11	26	0.0000	9.25
2017	11	26	6.0000	9.25
2017	11	26	12.0000	9.24
2017	11	26	18.0000	9.24
2017	11	27	0.0000	9.23
2017	11	27	6.0000	9.23
2017	11	27	12.0000	9.22
2017	11	27	18.0000	9.22
2017	11	28	0.0000	9.21
2017	11	28	6.0000	9.21
2017	11	28	12.0000	9.20
2017	11	28	18.0000	9.19
2017	11	29	0.0000	9.19
2017	11	29	6.0000	9.18
2017	11	29	12.0000	9.18
2017	11	29	18.0000	9.17
2017	11	30	0.0000	9.17
2017	11	30	6.0000	9.16
2017	11	30	12.0000	9.16
2017	11	30	18.0000	9.15
2017	12	1	0.0000	9.15
2017	12	1	6.0000	9.14
2017	12	1	12.0000	9.14
2017	12	1	18.0000	9.13
2017	12	2	0.0000	9.13
2017	12	2	6.0000	9.12
2017	12	2	12.0000	9.12
2017	12	2	18.0000	9.12
2017	12	3	0.0000	9.11
2017	12	3	6.0000	9.11
2017	12	3	12.0000	9.10
2017	12	3	18.0000	9.10
2017	12	4	0.0000	9.10
2017	12	4	6.0000	9.09
2017	12	4	12.0000	9.09
2017	12	4	18.0000	9.09
2017	12	5	0.0000	9.09
2017	12	5	6.0000	9.08
2017	12	5	12.0000	9.08
2017	12	5	18.0000	9.08
2017	12	6	0.0000	9.07

Year	Month	Day	Hour	Stage [ft]
2017	12	6	6.0000	9.07
2017	12	6	12.0000	9.07
2017	12	6	18.0000	9.07
2017	12	7	0.0000	9.06
2017	12	7	6.0000	9.06
2017	12	7	12.0000	9.06
2017	12	7	18.0000	9.06
2017	12	8	0.0000	9.05
2017	12	8	6.0000	9.05
2017	12	8	12.0000	9.05
2017	12	8	18.0000	9.05
2017	12	9	0.0000	9.04
2017	12	9	6.0000	9.05
2017	12	9	12.0000	9.16
2017	12	9	18.0000	9.17
2017	12	10	0.0000	9.17
2017	12	10	6.0000	9.17
2017	12	10	12.0000	9.16
2017	12	10	18.0000	9.15
2017	12	11	0.0000	9.15
2017	12	11	6.0000	9.15
2017	12	11	12.0000	9.14
2017	12	11	18.0000	9.14
2017	12	12	0.0000	9.13
2017	12	12	6.0000	9.13
2017	12	12	12.0000	9.13
2017	12	12	18.0000	9.12
2017	12	13	0.0000	9.12
2017	12	13	6.0000	9.11
2017	12	13	12.0000	9.11
2017	12	13	18.0000	9.11
2017	12	14	0.0000	9.10
2017	12	14	6.0000	9.10
2017	12	14	12.0000	9.10
2017	12	14	18.0000	9.09
2017	12	15	0.0000	9.09
2017	12	15	6.0000	9.09
2017	12	15	12.0000	9.08
2017	12	15	18.0000	9.08
2017	12	16	0.0000	9.08
2017	12	16	6.0000	9.08
2017	12	16	12.0000	9.07
2017	12	16	18.0000	9.07
2017	12	17	0.0000	9.07
2017	12	17	6.0000	9.06
2017	12	17	12.0000	9.06
2017	12	17	18.0000	9.06
2017	12	18	0.0000	9.06
2017	12	18	6.0000	9.05
2017	12	18	12.0000	9.05
2017	12	18	18.0000	9.05
2017	12	19	0.0000	9.05
2017	12	19	6.0000	9.05
2017	12	19	12.0000	9.04
2017	12	19	18.0000	9.04
2017	12	20	0.0000	9.04

Year	Month	Day	Hour	Stage [ft]
2017	12	20	6.0000	9.04
2017	12	20	12.0000	9.03
2017	12	20	18.0000	9.03
2017	12	21	0.0000	9.03
2017	12	21	6.0000	9.03
2017	12	21	12.0000	9.03
2017	12	21	18.0000	9.02
2017	12	22	0.0000	9.02
2017	12	22	6.0000	9.02
2017	12	22	12.0000	9.02
2017	12	22	18.0000	9.02
2017	12	23	0.0000	9.01
2017	12	23	6.0000	9.01
2017	12	23	12.0000	9.01
2017	12	23	18.0000	9.01
2017	12	24	0.0000	9.01
2017	12	24	6.0000	9.00
2017	12	24	12.0000	9.00
2017	12	24	18.0000	9.00
2017	12	25	0.0000	9.00
2017	12	25	6.0000	9.00
2017	12	25	12.0000	8.99
2017	12	25	18.0000	8.99
2017	12	26	0.0000	8.99
2017	12	26	6.0000	8.99
2017	12	26	12.0000	8.99
2017	12	26	18.0000	8.98
2017	12	27	0.0000	8.98
2017	12	27	6.0000	8.98
2017	12	27	12.0000	8.98
2017	12	27	18.0000	8.98
2017	12	28	0.0000	8.97
2017	12	28	6.0000	8.97
2017	12	28	12.0000	8.97
2017	12	28	18.0000	8.97
2017	12	29	0.0000	8.97
2017	12	29	6.0000	8.96
2017	12	29	12.0000	8.96
2017	12	29	18.0000	8.96
2017	12	30	0.0000	8.96
2017	12	30	6.0000	8.96
2017	12	30	12.0000	8.96
2017	12	30	18.0000	8.96
2017	12	31	0.0000	8.95

Comment:

Node: WEST

Scenario: Scenario1
Type: Stage/Area
Base Flow: 0.00 cfs
Initial Stage: 8.80 ft
Warning Stage: 0.00 ft

Stage [ft]	Area [ac]	Area [ft2]
3.00	8.2467	359225
3.50	8.3351	363075
4.00	8.4487	368025
4.50	8.5463	372275
5.00	8.6358	376175
5.50	8.7534	381300
6.00	8.8481	385425
6.50	8.9400	389425
7.00	9.0605	394675
7.50	9.1552	398800
8.00	9.2522	403025
8.50	9.3721	408250
9.00	9.4674	412400
9.50	9.5512	416050
10.00	9.6103	418625
10.50	9.6218	419125
11.00	9.6430	420050
11.50	9.6499	420350
12.00	9.6579	420700
12.50	9.6648	421000
13.00	9.6722	421322
13.50	9.6790	421619
14.00	9.6790	421619

Comment:

Weir Link: L-0010W

Scenario:	Scenario1
From Node:	WEST
To Node:	NTZ-0020
Link Count:	1
Flow Direction:	Both
Damping:	0.0000 ft
Weir Type:	Broad Crested Vertical
Geometry Type:	Irregular
Invert:	12.65 ft
Control Elevation:	12.65 ft
Cross Section:	X-0010W

Bottom Clip

Default:	0.00 ft
Op Table:	
Ref Node:	

Top Clip

Default:	0.00 ft
Op Table:	
Ref Node:	

Discharge Coefficients

Weir Default:	2.800
Weir Table:	
Orifice Default:	0.600
Orifice Table:	

Comment:

Weir Link: L-0020W

Scenario:	Scenario1
From Node:	EAST
To Node:	NTZ-0020
Link Count:	1
Flow Direction:	Both
Damping:	0.0000 ft
Weir Type:	Broad Crested Vertical
Geometry Type:	Irregular

Bottom Clip

Default:	0.00 ft
Op Table:	
Ref Node:	

Top Clip

Default:	0.00 ft
Op Table:	
Ref Node:	

Invert: 12.65 ft
Control Elevation: 12.65 ft
Cross Section: X-0010W

Discharge Coefficients

Weir Default: 2.800
Weir Table:
Orifice Default: 0.600
Orifice Table:

Comment:

Simulation: 2017 SAOR

Scenario: Scenario1
Run Date/Time: 12/9/2025 4:37:52 PM
Program Version: ICPR4 4.07.08

General

Run Mode: Normal

	Year	Month	Day	Hour [hr]
Start Time:	2017	1	1	0.0000
End Time:	2017	12	31	0.0000

	Hydrology [sec]	Surface Hydraulics [sec]	Groundwater [sec]
Min Calculation Time:	900.0000	0.1000	86400.0000
Max Calculation Time:		300.0000	

Output Time Increments

Hydrology

Year	Month	Day	Hour [hr]	Time Increment [min]
0	0	0	0.0000	1440.0000

Surface Hydraulics

Year	Month	Day	Hour [hr]	Time Increment [min]
0	0	0	0.0000	1440.0000

Groundwater

Year	Month	Day	Hour [hr]	Time Increment [min]
0	0	0	0.0000	1440.0000

Restart File

Save Restart: False

Resources & Lookup Tables

Resources

Rainfall Folder: NEXRAD
Reference ET Folder: ET
Unit Hydrograph Folder:

Lookup Tables

Boundary Stage Set: 2017
Extern Hydrograph Set:
Curve Number Set:
Green-Ampt Set: GREEN-AMPT
Vertical Layers Set:
Impervious Set: IMPERVIOUS
Roughness Set: ROUGHNESS
Crop Coef Set: EXISTING ET

Fillable Porosity Set:	POROSITY
Conductivity Set:	CONDUCTIVITY
Leakage Set:	LEAKAGE

Tolerances & Options

Time Marching:	SAOR	IA Recovery Time:	24.0000 hr
Max Iterations:	4	ET for Manual Basins:	False
Over-Relax Weight Fact:	0.5 dec		
dZ Tolerance:	0.0050 ft	Smp/Man Basin Rain Opt:	Basin Specification
Max dZ:	1.0000 ft	OF Region Rain Opt:	Region Specification
Link Optimizer Tol:	0.0005 ft		
Edge Length Option:	Automatic		
Dflt Damping (2D):	0.0050 ft	Dflt Damping (1D):	0.0050 ft
Min Node Srf Area (2D):	100 ft2	Min Node Srf Area (1D):	100 ft2
Energy Switch (2D):	Energy	Energy Switch (1D):	Energy

Comment:

Absolute Time	Relative Time [hrs]	Recharge Volume [ft3]
2017:1:1:0.0000	0.0000	0
2017:1:2:0.0000	24.0000	30859
2017:1:3:0.0000	48.0000	55081
2017:1:4:0.0000	72.0000	73884
2017:1:5:0.0000	96.0000	88872
2017:1:6:0.0000	120.0000	101070
2017:1:7:0.0000	144.0000	111158
2017:1:8:0.0000	168.0000	119759
2017:1:9:0.0000	192.0000	127391
2017:1:10:0.0000	216.0000	133987
2017:1:11:0.0000	240.0000	139731
2017:1:12:0.0000	264.0000	144730
2017:1:13:0.0000	288.0000	148821
2017:1:14:0.0000	312.0000	152282
2017:1:15:0.0000	336.0000	155368
2017:1:16:0.0000	360.0000	158075
2017:1:17:0.0000	384.0000	160247
2017:1:18:0.0000	408.0000	161997
2017:1:19:0.0000	432.0000	163537
2017:1:20:0.0000	456.0000	164800
2017:1:21:0.0000	480.0000	165736
2017:1:22:0.0000	504.0000	166232
2017:1:23:0.0000	528.0000	166360
2017:1:24:0.0000	552.0000	166667
2017:1:25:0.0000	576.0000	167036
2017:1:26:0.0000	600.0000	167383
2017:1:27:0.0000	624.0000	167533
2017:1:28:0.0000	648.0000	167711
2017:1:29:0.0000	672.0000	167827
2017:1:30:0.0000	696.0000	168470
2017:1:31:0.0000	720.0000	168825
2017:2:1:0.0000	744.0000	168869
2017:2:2:0.0000	768.0000	168776
2017:2:3:0.0000	792.0000	168543
2017:2:4:0.0000	816.0000	168180
2017:2:5:0.0000	840.0000	167623
2017:2:6:0.0000	864.0000	167135
2017:2:7:0.0000	888.0000	166609
2017:2:8:0.0000	912.0000	166478
2017:2:9:0.0000	936.0000	166537
2017:2:10:0.0000	960.0000	166487
2017:2:11:0.0000	984.0000	166175
2017:2:12:0.0000	1008.0000	166002
2017:2:13:0.0000	1032.0000	165877
2017:2:14:0.0000	1056.0000	165780
2017:2:15:0.0000	1080.0000	165593
2017:2:16:0.0000	1104.0000	165198
2017:2:17:0.0000	1128.0000	164793
2017:2:18:0.0000	1152.0000	164434

Absolute Time	Relative Time [hrs]	Recharge Volume [ft3]
2017:2:19:0.0000	1176.0000	164170
2017:2:20:0.0000	1200.0000	163694
2017:2:21:0.0000	1224.0000	163146
2017:2:22:0.0000	1248.0000	162765
2017:2:23:0.0000	1272.0000	162713
2017:2:24:0.0000	1296.0000	162620
2017:2:25:0.0000	1320.0000	162298
2017:2:26:0.0000	1344.0000	161780
2017:2:27:0.0000	1368.0000	161104
2017:2:28:0.0000	1392.0000	160333
2017:3:1:0.0000	1416.0000	159600
2017:3:2:0.0000	1440.0000	158982
2017:3:3:0.0000	1464.0000	158224
2017:3:4:0.0000	1488.0000	157508
2017:3:5:0.0000	1512.0000	156755
2017:3:6:0.0000	1536.0000	157009
2017:3:7:0.0000	1560.0000	157639
2017:3:8:0.0000	1584.0000	158266
2017:3:9:0.0000	1608.0000	158883
2017:3:10:0.0000	1632.0000	159489
2017:3:11:0.0000	1656.0000	160073
2017:3:12:0.0000	1680.0000	160638
2017:3:13:0.0000	1704.0000	161227
2017:3:14:0.0000	1728.0000	161798
2017:3:15:0.0000	1752.0000	162467
2017:3:16:0.0000	1776.0000	163030
2017:3:17:0.0000	1800.0000	163573
2017:3:18:0.0000	1824.0000	164100
2017:3:19:0.0000	1848.0000	164616
2017:3:20:0.0000	1872.0000	165114
2017:3:21:0.0000	1896.0000	165604
2017:3:22:0.0000	1920.0000	166094
2017:3:23:0.0000	1944.0000	166573
2017:3:24:0.0000	1968.0000	167042
2017:3:25:0.0000	1992.0000	167504
2017:3:26:0.0000	2016.0000	167968
2017:3:27:0.0000	2040.0000	168433
2017:3:28:0.0000	2064.0000	168883
2017:3:29:0.0000	2088.0000	169325
2017:3:30:0.0000	2112.0000	169759
2017:3:31:0.0000	2136.0000	170189
2017:4:1:0.0000	2160.0000	170714
2017:4:2:0.0000	2184.0000	171279
2017:4:3:0.0000	2208.0000	171813
2017:4:4:0.0000	2232.0000	172328
2017:4:5:0.0000	2256.0000	172724
2017:4:6:0.0000	2280.0000	173128
2017:4:7:0.0000	2304.0000	173528
2017:4:8:0.0000	2328.0000	173903

Absolute Time	Relative Time [hrs]	Recharge Volume [ft3]
2017:4:9:0.0000	2352.0000	174286
2017:4:10:0.0000	2376.0000	174663
2017:4:11:0.0000	2400.0000	175035
2017:4:12:0.0000	2424.0000	175407
2017:4:13:0.0000	2448.0000	175793
2017:4:14:0.0000	2472.0000	176161
2017:4:15:0.0000	2496.0000	176519
2017:4:16:0.0000	2520.0000	176865
2017:4:17:0.0000	2544.0000	177257
2017:4:18:0.0000	2568.0000	177641
2017:4:19:0.0000	2592.0000	178015
2017:4:20:0.0000	2616.0000	178364
2017:4:21:0.0000	2640.0000	178704
2017:4:22:0.0000	2664.0000	179043
2017:4:23:0.0000	2688.0000	179471
2017:4:24:0.0000	2712.0000	179966
2017:4:25:0.0000	2736.0000	180456
2017:4:26:0.0000	2760.0000	180940
2017:4:27:0.0000	2784.0000	181347
2017:4:28:0.0000	2808.0000	181692
2017:4:29:0.0000	2832.0000	182005
2017:4:30:0.0000	2856.0000	182300
2017:5:1:0.0000	2880.0000	182601
2017:5:2:0.0000	2904.0000	182893
2017:5:3:0.0000	2928.0000	183200
2017:5:4:0.0000	2952.0000	183506
2017:5:5:0.0000	2976.0000	183795
2017:5:6:0.0000	3000.0000	184231
2017:5:7:0.0000	3024.0000	184628
2017:5:8:0.0000	3048.0000	184905
2017:5:9:0.0000	3072.0000	185206
2017:5:10:0.0000	3096.0000	185486
2017:5:11:0.0000	3120.0000	185763
2017:5:12:0.0000	3144.0000	186031
2017:5:13:0.0000	3168.0000	186298
2017:5:14:0.0000	3192.0000	186566
2017:5:15:0.0000	3216.0000	186831
2017:5:16:0.0000	3240.0000	187094
2017:5:17:0.0000	3264.0000	187425
2017:5:18:0.0000	3288.0000	187711
2017:5:19:0.0000	3312.0000	187975
2017:5:20:0.0000	3336.0000	188279
2017:5:21:0.0000	3360.0000	188525
2017:5:22:0.0000	3384.0000	188808
2017:5:23:0.0000	3408.0000	189247
2017:5:24:0.0000	3432.0000	189681
2017:5:25:0.0000	3456.0000	190096
2017:5:26:0.0000	3480.0000	190536
2017:5:27:0.0000	3504.0000	190971

Absolute Time	Relative Time [hrs]	Recharge Volume [ft3]
2017:5:28:0.0000	3528.0000	191392
2017:5:29:0.0000	3552.0000	191725
2017:5:30:0.0000	3576.0000	192064
2017:5:31:0.0000	3600.0000	192332
2017:6:1:0.0000	3624.0000	192592
2017:6:2:0.0000	3648.0000	193445
2017:6:3:0.0000	3672.0000	194879
2017:6:4:0.0000	3696.0000	196534
2017:6:5:0.0000	3720.0000	198488
2017:6:6:0.0000	3744.0000	200672
2017:6:7:0.0000	3768.0000	239584
2017:6:8:0.0000	3792.0000	398604
2017:6:9:0.0000	3816.0000	513328
2017:6:10:0.0000	3840.0000	570451
2017:6:11:0.0000	3864.0000	655753
2017:6:12:0.0000	3888.0000	738307
2017:6:13:0.0000	3912.0000	783926
2017:6:14:0.0000	3936.0000	814740
2017:6:15:0.0000	3960.0000	853053
2017:6:16:0.0000	3984.0000	899186
2017:6:17:0.0000	4008.0000	931797
2017:6:18:0.0000	4032.0000	966116
2017:6:19:0.0000	4056.0000	1007308
2017:6:20:0.0000	4080.0000	1053052
2017:6:21:0.0000	4104.0000	1361862
2017:6:22:0.0000	4128.0000	1494429
2017:6:23:0.0000	4152.0000	1626974
2017:6:24:0.0000	4176.0000	1673732
2017:6:25:0.0000	4200.0000	1766745
2017:6:26:0.0000	4224.0000	1815298
2017:6:27:0.0000	4248.0000	1922115
2017:6:28:0.0000	4272.0000	2066646
2017:6:29:0.0000	4296.0000	2166015
2017:6:30:0.0000	4320.0000	2221157
2017:7:1:0.0000	4344.0000	2325308
2017:7:2:0.0000	4368.0000	2354574
2017:7:3:0.0000	4392.0000	2404991
2017:7:4:0.0000	4416.0000	2419574
2017:7:5:0.0000	4440.0000	2434385
2017:7:6:0.0000	4464.0000	2440971
2017:7:7:0.0000	4488.0000	2449179
2017:7:8:0.0000	4512.0000	2455939
2017:7:9:0.0000	4536.0000	2459934
2017:7:10:0.0000	4560.0000	2462668
2017:7:11:0.0000	4584.0000	2464044
2017:7:12:0.0000	4608.0000	2468213
2017:7:13:0.0000	4632.0000	2477612
2017:7:14:0.0000	4656.0000	2484626
2017:7:15:0.0000	4680.0000	2496279

Absolute Time	Relative Time [hrs]	Recharge Volume [ft3]
2017:7:16:0.0000	4704.0000	2504100
2017:7:17:0.0000	4728.0000	2506611
2017:7:18:0.0000	4752.0000	2513257
2017:7:19:0.0000	4776.0000	2550730
2017:7:20:0.0000	4800.0000	2589410
2017:7:21:0.0000	4824.0000	2610409
2017:7:22:0.0000	4848.0000	2717450
2017:7:23:0.0000	4872.0000	2782791
2017:7:24:0.0000	4896.0000	2822863
2017:7:25:0.0000	4920.0000	2825247
2017:7:26:0.0000	4944.0000	2827832
2017:7:27:0.0000	4968.0000	2828355
2017:7:28:0.0000	4992.0000	2831642
2017:7:29:0.0000	5016.0000	2829598
2017:7:30:0.0000	5040.0000	2830524
2017:7:31:0.0000	5064.0000	2839288
2017:8:1:0.0000	5088.0000	3139139
2017:8:2:0.0000	5112.0000	3328423
2017:8:3:0.0000	5136.0000	3360145
2017:8:4:0.0000	5160.0000	3389012
2017:8:5:0.0000	5184.0000	3431939
2017:8:6:0.0000	5208.0000	3485967
2017:8:7:0.0000	5232.0000	3596986
2017:8:8:0.0000	5256.0000	3645158
2017:8:9:0.0000	5280.0000	3735057
2017:8:10:0.0000	5304.0000	3766262
2017:8:11:0.0000	5328.0000	3874615
2017:8:12:0.0000	5352.0000	4105006
2017:8:13:0.0000	5376.0000	4194345
2017:8:14:0.0000	5400.0000	4243313
2017:8:15:0.0000	5424.0000	4329928
2017:8:16:0.0000	5448.0000	4354537
2017:8:17:0.0000	5472.0000	4429670
2017:8:18:0.0000	5496.0000	4471114
2017:8:19:0.0000	5520.0000	4538253
2017:8:20:0.0000	5544.0000	4541002
2017:8:21:0.0000	5568.0000	4577751
2017:8:22:0.0000	5592.0000	4578247
2017:8:23:0.0000	5616.0000	4582552
2017:8:24:0.0000	5640.0000	4592899
2017:8:25:0.0000	5664.0000	4662852
2017:8:26:0.0000	5688.0000	4924720
2017:8:27:0.0000	5712.0000	5088049
2017:8:28:0.0000	5736.0000	5315513
2017:8:29:0.0000	5760.0000	5380804
2017:8:30:0.0000	5784.0000	5494497
2017:8:31:0.0000	5808.0000	5540453
2017:9:1:0.0000	5832.0000	5650963
2017:9:2:0.0000	5856.0000	5718839

Absolute Time	Relative Time [hrs]	Recharge Volume [ft3]
2017:9:3:0.0000	5880.0000	5872923
2017:9:4:0.0000	5904.0000	5929555
2017:9:5:0.0000	5928.0000	6047159
2017:9:6:0.0000	5952.0000	6096628
2017:9:7:0.0000	5976.0000	6187817
2017:9:8:0.0000	6000.0000	6243813
2017:9:9:0.0000	6024.0000	6330922
2017:9:10:0.0000	6048.0000	6430118
2017:9:11:0.0000	6072.0000	6941204
2017:9:12:0.0000	6096.0000	7001757
2017:9:13:0.0000	6120.0000	7118913
2017:9:14:0.0000	6144.0000	7168494
2017:9:15:0.0000	6168.0000	7345990
2017:9:16:0.0000	6192.0000	7401409
2017:9:17:0.0000	6216.0000	7517203
2017:9:18:0.0000	6240.0000	7563391
2017:9:19:0.0000	6264.0000	7678146
2017:9:20:0.0000	6288.0000	7725297
2017:9:21:0.0000	6312.0000	7841753
2017:9:22:0.0000	6336.0000	7887988
2017:9:23:0.0000	6360.0000	8069778
2017:9:24:0.0000	6384.0000	8127709
2017:9:25:0.0000	6408.0000	8253095
2017:9:26:0.0000	6432.0000	8302083
2017:9:27:0.0000	6456.0000	8424588
2017:9:28:0.0000	6480.0000	8472994
2017:9:29:0.0000	6504.0000	8595370
2017:9:30:0.0000	6528.0000	8711611
2017:10:1:0.0000	6552.0000	8840554
2017:10:2:0.0000	6576.0000	8892199
2017:10:3:0.0000	6600.0000	9017979
2017:10:4:0.0000	6624.0000	9071781
2017:10:5:0.0000	6648.0000	9161777
2017:10:6:0.0000	6672.0000	9213825
2017:10:7:0.0000	6696.0000	9297661
2017:10:8:0.0000	6720.0000	9324827
2017:10:9:0.0000	6744.0000	9355537
2017:10:10:0.0000	6768.0000	9353988
2017:10:11:0.0000	6792.0000	9361662
2017:10:12:0.0000	6816.0000	9358354
2017:10:13:0.0000	6840.0000	9357167
2017:10:14:0.0000	6864.0000	9354023
2017:10:15:0.0000	6888.0000	9351733
2017:10:16:0.0000	6912.0000	9348280
2017:10:17:0.0000	6936.0000	9349017
2017:10:18:0.0000	6960.0000	9349044
2017:10:19:0.0000	6984.0000	9349023
2017:10:20:0.0000	7008.0000	9347432
2017:10:21:0.0000	7032.0000	9344730

Absolute Time	Relative Time [hrs]	Recharge Volume [ft3]
2017:10:22:0.0000	7056.0000	9344377
2017:10:23:0.0000	7080.0000	9344647
2017:10:24:0.0000	7104.0000	9344880
2017:10:25:0.0000	7128.0000	9377071
2017:10:26:0.0000	7152.0000	9385142
2017:10:27:0.0000	7176.0000	9388148
2017:10:28:0.0000	7200.0000	9388372
2017:10:29:0.0000	7224.0000	9506865
2017:10:30:0.0000	7248.0000	9532351
2017:10:31:0.0000	7272.0000	9542098
2017:11:1:0.0000	7296.0000	9544491
2017:11:2:0.0000	7320.0000	9545242
2017:11:3:0.0000	7344.0000	9544705
2017:11:4:0.0000	7368.0000	9543867
2017:11:5:0.0000	7392.0000	9542366
2017:11:6:0.0000	7416.0000	9540591
2017:11:7:0.0000	7440.0000	9538607
2017:11:8:0.0000	7464.0000	9536568
2017:11:9:0.0000	7488.0000	9534341
2017:11:10:0.0000	7512.0000	9532064
2017:11:11:0.0000	7536.0000	9529676
2017:11:12:0.0000	7560.0000	9526822
2017:11:13:0.0000	7584.0000	9525409
2017:11:14:0.0000	7608.0000	9525575
2017:11:15:0.0000	7632.0000	9522534
2017:11:16:0.0000	7656.0000	9519787
2017:11:17:0.0000	7680.0000	9516828
2017:11:18:0.0000	7704.0000	9513752
2017:11:19:0.0000	7728.0000	9510684
2017:11:20:0.0000	7752.0000	9507188
2017:11:21:0.0000	7776.0000	9503559
2017:11:22:0.0000	7800.0000	9500145
2017:11:23:0.0000	7824.0000	9497446
2017:11:24:0.0000	7848.0000	9496405
2017:11:25:0.0000	7872.0000	9496742
2017:11:26:0.0000	7896.0000	9496281
2017:11:27:0.0000	7920.0000	9493141
2017:11:28:0.0000	7944.0000	9490351
2017:11:29:0.0000	7968.0000	9486696
2017:11:30:0.0000	7992.0000	9483146
2017:12:1:0.0000	8016.0000	9479526
2017:12:2:0.0000	8040.0000	9476075
2017:12:3:0.0000	8064.0000	9472869
2017:12:4:0.0000	8088.0000	9469803
2017:12:5:0.0000	8112.0000	9466635
2017:12:6:0.0000	8136.0000	9463728
2017:12:7:0.0000	8160.0000	9460877
2017:12:8:0.0000	8184.0000	9458056
2017:12:9:0.0000	8208.0000	9455135

Absolute Time	Relative Time [hrs]	Recharge Volume [ft3]
2017:12:10:0.0000	8232.0000	9462124
2017:12:11:0.0000	8256.0000	9464949
2017:12:12:0.0000	8280.0000	9466410
2017:12:13:0.0000	8304.0000	9467313
2017:12:14:0.0000	8328.0000	9467934
2017:12:15:0.0000	8352.0000	9468415
2017:12:16:0.0000	8376.0000	9468784
2017:12:17:0.0000	8400.0000	9469032
2017:12:18:0.0000	8424.0000	9469072
2017:12:19:0.0000	8448.0000	9468989
2017:12:20:0.0000	8472.0000	9468803
2017:12:21:0.0000	8496.0000	9468545
2017:12:22:0.0000	8520.0000	9468160
2017:12:23:0.0000	8544.0000	9467688
2017:12:24:0.0000	8568.0000	9467107
2017:12:25:0.0000	8592.0000	9466279
2017:12:26:0.0000	8616.0000	9465036
2017:12:27:0.0000	8640.0000	9463421
2017:12:28:0.0000	8664.0000	9461612
2017:12:29:0.0000	8688.0000	9459541
2017:12:30:0.0000	8712.0000	9457845
2017:12:31:0.0000	8736.0000	9456042

APPENDIX C
PCM INPUT/OUTPUT REPORTS



Node: EAST

Scenario: Scenario1
Type: Stage/Area
Base Flow: 0.00 cfs
Initial Stage: 8.80 ft
Warning Stage: 0.00 ft

Stage [ft]	Area [ac]	Area [ft2]
3.00	5.2261	227650
3.50	5.2726	229675
4.00	5.3444	232800
4.50	5.4488	237350
5.00	5.5228	240575
5.50	5.5785	243000
6.00	5.6732	247125
6.50	5.7751	251562
7.00	5.8144	253275
7.50	5.9062	257275
8.00	6.0193	262200
8.50	6.0709	264450
9.00	6.1433	267600
9.50	6.2546	272450
10.00	6.3303	275750
10.50	6.3832	278050
11.00	6.4721	281925
11.50	6.5504	285338
12.00	6.5622	285850
12.50	6.6219	288450
13.00	6.6346	289003
13.50	6.6346	289003
18.50	8.1500	355014

Comment:

Node: WEST

Scenario: Scenario1
Type: Stage/Area
Base Flow: 0.00 cfs
Initial Stage: 8.80 ft
Warning Stage: 0.00 ft

Stage [ft]	Area [ac]	Area [ft2]
3.00	5.4190	236050
3.50	5.4890	239100
4.00	5.5917	243575
4.50	5.6600	246550
5.00	5.7306	249625
5.50	5.8247	253725
6.00	5.8982	256925
6.50	5.9762	260325
7.00	6.0503	263550
7.50	6.1473	267775
8.00	6.2242	271125
8.50	6.2948	274200
9.00	6.4004	278800

Stage [ft]	Area [ac]	Area [ft2]
9.50	6.4738	282000
10.00	6.5467	285175
10.50	6.6426	289350
11.00	6.7195	292700
11.50	6.7545	294225
12.00	6.7898	295763
12.50	6.8518	298462
13.00	6.8518	298464
13.50	6.8518	298464
18.50	8.4000	365904

Comment:

Pipe Link: EQUALIZER		Upstream		Downstream	
Scenario:	Scenario1	Invert:	8.00 ft	Invert:	8.00 ft
From Node:	WEST	Manning's N:	0.0120	Manning's N:	0.0120
To Node:	EAST	Geometry: Circular		Geometry: Circular	
Link Count:	1	Max Depth:	2.00 ft	Max Depth:	2.00 ft
Flow Direction:	Both	Bottom Clip			
Damping:	0.0000 ft	Default:	0.00 ft	Default:	0.00 ft
Length:	360.00 ft	Op Table:		Op Table:	
FHWA Code:	1	Ref Node:		Ref Node:	
Entr Loss Coef:	0.70	Manning's N:	0.0000	Manning's N:	0.0000
Exit Loss Coef:	1.00	Top Clip			
Bend Loss Coef:	0.00	Default:	0.00 ft	Default:	0.00 ft
Bend Location:	0.00 dec	Op Table:		Op Table:	
Energy Switch:	Energy	Ref Node:		Ref Node:	
		Manning's N:	0.0000	Manning's N:	0.0000

Comment:

Simulation: 2017 SAOR

Scenario: Scenario1
Run Date/Time: 12/9/2025 4:45:29 PM
Program Version: ICPR4 4.07.08

General

Run Mode: Normal

	Year	Month	Day	Hour [hr]
Start Time:	2017	1	1	0.0000
End Time:	2017	12	31	0.0000

	Hydrology [sec]	Surface Hydraulics [sec]	Groundwater [sec]
Min Calculation Time:	900.0000	0.1000	86400.0000
Max Calculation Time:		300.0000	

Output Time Increments

Hydrology

Year	Month	Day	Hour [hr]	Time Increment [min]

Year	Month	Day	Hour [hr]	Time Increment [min]
0	0	0	0.0000	1440.0000

Surface Hydraulics

Year	Month	Day	Hour [hr]	Time Increment [min]
0	0	0	0.0000	1440.0000

Groundwater

Year	Month	Day	Hour [hr]	Time Increment [min]
0	0	0	0.0000	1440.0000

Restart File

Save Restart: False

Resources & Lookup Tables

Resources

Rainfall Folder: NEXRAD
Reference ET Folder: ET
Unit Hydrograph Folder:

Lookup Tables

Boundary Stage Set: 2017
Extern Hydrograph Set:
Curve Number Set:
Green-Ampt Set: GREEN-AMPT
Vertical Layers Set:
Impervious Set: PROPOSED IMPERVIOUS
Roughness Set: PROPOSED ROUGHNESS
Crop Coef Set: PROPOSED ET
Fillable Porosity Set: POROSITY
Conductivity Set: CONDUCTIVITY
Leakage Set: LEAKAGE

Tolerances & Options

Time Marching: SAOR
Max Iterations: 4
Over-Relax Weight Fact: 0.5 dec
dZ Tolerance: 0.0050 ft
Max dZ: 1.0000 ft
Link Optimizer Tol: 0.0005 ft

Edge Length Option: Automatic

Dflt Damping (2D): 0.0050 ft
Min Node Srf Area (2D): 100 ft2
Energy Switch (2D): Energy

IA Recovery Time: 24.0000 hr
ET for Manual Basins: False

Smp/Man Basin Rain Opt: Basin Specification
OF Region Rain Opt: Region Specification

Dflt Damping (1D): 0.0050 ft
Min Node Srf Area (1D): 100 ft2
Energy Switch (1D): Energy

Comment:

Sim	Absolute Time	Relative Time [hrs]	Recharge Volume [ft3]
2017 SAOR	2017:1:1:0.0000	0.0000	0
2017 SAOR	2017:1:2:0.0000	24.0000	21608
2017 SAOR	2017:1:3:0.0000	48.0000	39460
2017 SAOR	2017:1:4:0.0000	72.0000	54493
2017 SAOR	2017:1:5:0.0000	96.0000	67440
2017 SAOR	2017:1:6:0.0000	120.0000	78705
2017 SAOR	2017:1:7:0.0000	144.0000	88635
2017 SAOR	2017:1:8:0.0000	168.0000	97555
2017 SAOR	2017:1:9:0.0000	192.0000	105780
2017 SAOR	2017:1:10:0.0000	216.0000	113225
2017 SAOR	2017:1:11:0.0000	240.0000	120017
2017 SAOR	2017:1:12:0.0000	264.0000	126224
2017 SAOR	2017:1:13:0.0000	288.0000	131670
2017 SAOR	2017:1:14:0.0000	312.0000	136565
2017 SAOR	2017:1:15:0.0000	336.0000	141124
2017 SAOR	2017:1:16:0.0000	360.0000	145336
2017 SAOR	2017:1:17:0.0000	384.0000	149065
2017 SAOR	2017:1:18:0.0000	408.0000	152378
2017 SAOR	2017:1:19:0.0000	432.0000	155468
2017 SAOR	2017:1:20:0.0000	456.0000	158272
2017 SAOR	2017:1:21:0.0000	480.0000	160741
2017 SAOR	2017:1:22:0.0000	504.0000	162772
2017 SAOR	2017:1:23:0.0000	528.0000	164413
2017 SAOR	2017:1:24:0.0000	552.0000	166103
2017 SAOR	2017:1:25:0.0000	576.0000	168010
2017 SAOR	2017:1:26:0.0000	600.0000	169957
2017 SAOR	2017:1:27:0.0000	624.0000	171728
2017 SAOR	2017:1:28:0.0000	648.0000	173504
2017 SAOR	2017:1:29:0.0000	672.0000	175197
2017 SAOR	2017:1:30:0.0000	696.0000	177368
2017 SAOR	2017:1:31:0.0000	720.0000	179476
2017 SAOR	2017:2:1:0.0000	744.0000	181418
2017 SAOR	2017:2:2:0.0000	768.0000	183268
2017 SAOR	2017:2:3:0.0000	792.0000	184988
2017 SAOR	2017:2:4:0.0000	816.0000	186569
2017 SAOR	2017:2:5:0.0000	840.0000	187916
2017 SAOR	2017:2:6:0.0000	864.0000	189442
2017 SAOR	2017:2:7:0.0000	888.0000	191291
2017 SAOR	2017:2:8:0.0000	912.0000	193537
2017 SAOR	2017:2:9:0.0000	936.0000	196041
2017 SAOR	2017:2:10:0.0000	960.0000	198464
2017 SAOR	2017:2:11:0.0000	984.0000	200739
2017 SAOR	2017:2:12:0.0000	1008.0000	202985
2017 SAOR	2017:2:13:0.0000	1032.0000	205178
2017 SAOR	2017:2:14:0.0000	1056.0000	207311
2017 SAOR	2017:2:15:0.0000	1080.0000	209352
2017 SAOR	2017:2:16:0.0000	1104.0000	211257
2017 SAOR	2017:2:17:0.0000	1128.0000	213096
2017 SAOR	2017:2:18:0.0000	1152.0000	214912

Sim	Absolute Time	Relative Time [hrs]	Recharge Volume [ft3]
2017 SAOR	2017:2:19:0.0000	1176.0000	216702
2017 SAOR	2017:2:20:0.0000	1200.0000	218396
2017 SAOR	2017:2:21:0.0000	1224.0000	220059
2017 SAOR	2017:2:22:0.0000	1248.0000	221762
2017 SAOR	2017:2:23:0.0000	1272.0000	223507
2017 SAOR	2017:2:24:0.0000	1296.0000	225432
2017 SAOR	2017:2:25:0.0000	1320.0000	227454
2017 SAOR	2017:2:26:0.0000	1344.0000	229506
2017 SAOR	2017:2:27:0.0000	1368.0000	231553
2017 SAOR	2017:2:28:0.0000	1392.0000	233573
2017 SAOR	2017:3:1:0.0000	1416.0000	235553
2017 SAOR	2017:3:2:0.0000	1440.0000	237487
2017 SAOR	2017:3:3:0.0000	1464.0000	239376
2017 SAOR	2017:3:4:0.0000	1488.0000	241219
2017 SAOR	2017:3:5:0.0000	1512.0000	243015
2017 SAOR	2017:3:6:0.0000	1536.0000	244764
2017 SAOR	2017:3:7:0.0000	1560.0000	246467
2017 SAOR	2017:3:8:0.0000	1584.0000	248124
2017 SAOR	2017:3:9:0.0000	1608.0000	249739
2017 SAOR	2017:3:10:0.0000	1632.0000	251313
2017 SAOR	2017:3:11:0.0000	1656.0000	252848
2017 SAOR	2017:3:12:0.0000	1680.0000	254346
2017 SAOR	2017:3:13:0.0000	1704.0000	255809
2017 SAOR	2017:3:14:0.0000	1728.0000	257238
2017 SAOR	2017:3:15:0.0000	1752.0000	258635
2017 SAOR	2017:3:16:0.0000	1776.0000	260000
2017 SAOR	2017:3:17:0.0000	1800.0000	261337
2017 SAOR	2017:3:18:0.0000	1824.0000	262645
2017 SAOR	2017:3:19:0.0000	1848.0000	263927
2017 SAOR	2017:3:20:0.0000	1872.0000	265182
2017 SAOR	2017:3:21:0.0000	1896.0000	266413
2017 SAOR	2017:3:22:0.0000	1920.0000	267621
2017 SAOR	2017:3:23:0.0000	1944.0000	268805
2017 SAOR	2017:3:24:0.0000	1968.0000	269968
2017 SAOR	2017:3:25:0.0000	1992.0000	271110
2017 SAOR	2017:3:26:0.0000	2016.0000	272232
2017 SAOR	2017:3:27:0.0000	2040.0000	273334
2017 SAOR	2017:3:28:0.0000	2064.0000	274417
2017 SAOR	2017:3:29:0.0000	2088.0000	275483
2017 SAOR	2017:3:30:0.0000	2112.0000	276531
2017 SAOR	2017:3:31:0.0000	2136.0000	277562
2017 SAOR	2017:4:1:0.0000	2160.0000	278577
2017 SAOR	2017:4:2:0.0000	2184.0000	279578
2017 SAOR	2017:4:3:0.0000	2208.0000	280564
2017 SAOR	2017:4:4:0.0000	2232.0000	281536
2017 SAOR	2017:4:5:0.0000	2256.0000	282495
2017 SAOR	2017:4:6:0.0000	2280.0000	283441
2017 SAOR	2017:4:7:0.0000	2304.0000	284373
2017 SAOR	2017:4:8:0.0000	2328.0000	285292

Sim	Absolute Time	Relative Time [hrs]	Recharge Volume [ft3]
2017 SAOR	2017:4:9:0.0000	2352.0000	286198
2017 SAOR	2017:4:10:0.0000	2376.0000	287092
2017 SAOR	2017:4:11:0.0000	2400.0000	287973
2017 SAOR	2017:4:12:0.0000	2424.0000	288842
2017 SAOR	2017:4:13:0.0000	2448.0000	289700
2017 SAOR	2017:4:14:0.0000	2472.0000	290547
2017 SAOR	2017:4:15:0.0000	2496.0000	291383
2017 SAOR	2017:4:16:0.0000	2520.0000	292209
2017 SAOR	2017:4:17:0.0000	2544.0000	293024
2017 SAOR	2017:4:18:0.0000	2568.0000	293830
2017 SAOR	2017:4:19:0.0000	2592.0000	294625
2017 SAOR	2017:4:20:0.0000	2616.0000	295412
2017 SAOR	2017:4:21:0.0000	2640.0000	296189
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2017 SAOR	2017:5:9:0.0000	3072.0000	309281
2017 SAOR	2017:5:10:0.0000	3096.0000	309945
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2017 SAOR	2017:11:29:0.0000	7968.0000	12211944
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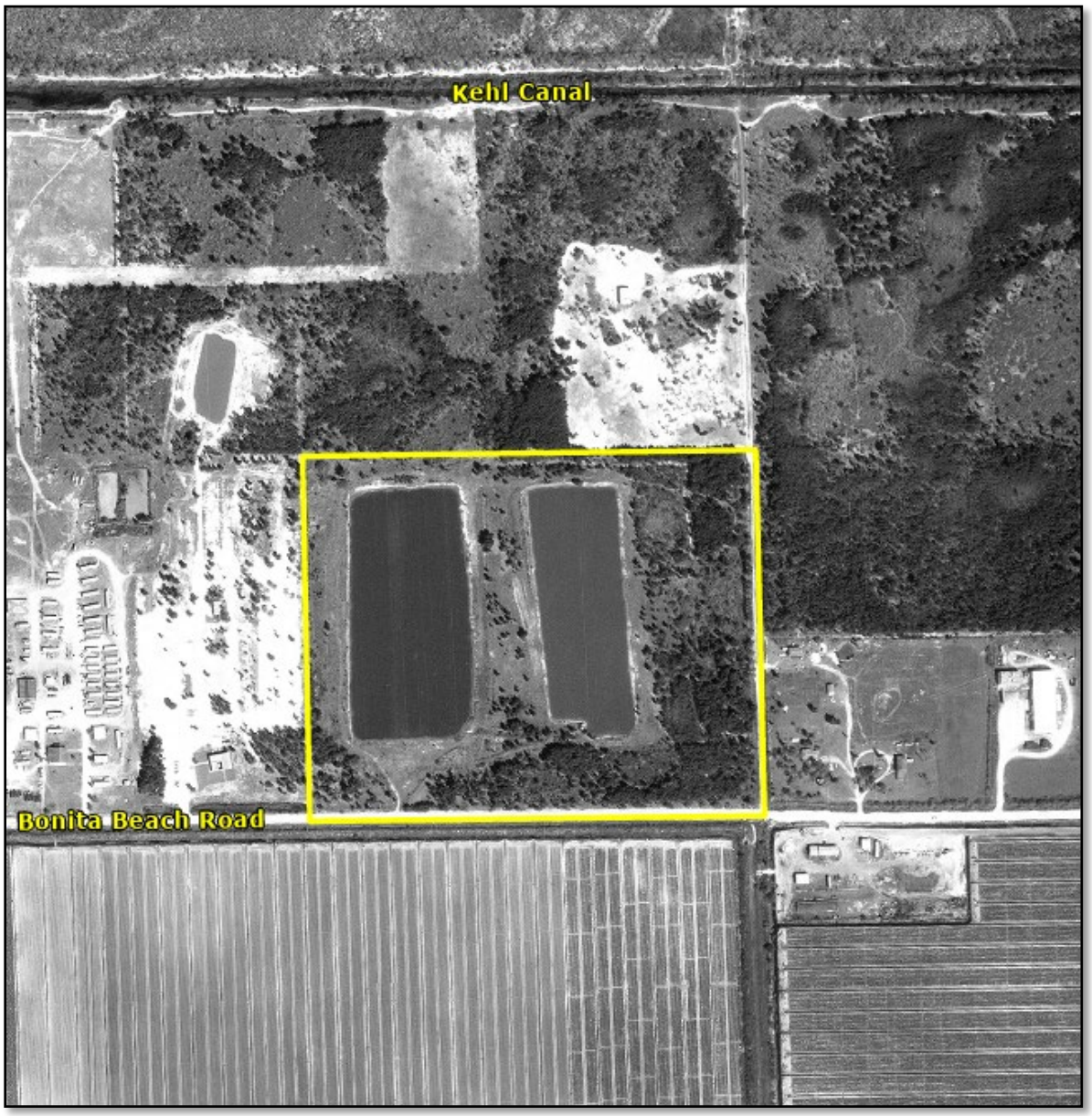
Sim	Absolute Time	Relative Time [hrs]	Recharge Volume [ft3]
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CHARACTERIZATION OF GROUND AND SURFACE WATER RESOURCES

White Willow

Lee County, Florida

December 2025



1986 aerial photograph, obtained from the Florida Department of Transportation

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1.0 INTRODUCTION

The White Willow project (subject property) is located in southern Lee County, Florida, approximately 1.5 miles east of Interstate 75 and immediately north of Bonita Beach Road (County Road 865). The property comprises approximately 50 acres and is owned by Crisafulli Investment Group, LLC. It lies along the southern boundary of the County's Density Reduction / Groundwater Resource (DR/GR) Future Land Use area (**Figure 1**) and within the DR/GR's Flint Pen sub-watershed (**Figure 2**). The site is currently zoned Agricultural (AG-2), and the Applicant is requesting a Comprehensive Plan Amendment and zoning change to allow for a proposed residential development.

The subject property and surrounding lands have experienced significant disturbance beginning with the excavation of the Kehl Canal in the early 1960s. The canal, constructed to drain lands east of the Imperial River, severed hydrologic connections between the site and the Corkscrew Swamp Regional Ecosystem Watershed (CREW) and altered historical north-to-south surface water flow paths. The subject property is located approximately 1,300 feet south of the Kehl Canal and is within Water Body Identification (WBID) 3258EE, which the Florida Department of Environmental Protection (FDEP) has designated as impaired for dissolved oxygen (DO).

The property contains two (2) centrally located, rectangular historic (pre-1980) limestone mining pits totaling approximately 15 acres, or about 30 percent of the site. In addition to the excavations, legacy mining features such as disturbed land surfaces, drainage ditches, and several debris piles remain onsite and contribute to the site's altered hydrologic conditions.

As a result of these historic land uses, 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 accordance with Lee County's Comprehensive Plan (the Lee Plan), the Applicant's request is consistent with policies addressing groundwater recharge and wetland resource protection and is designed to improve existing site-specific water resource conditions. The proposed development incorporates site design and water management strategies intended to restore hydrologic functions that have been altered by prior land use activities on the subject property.

The proposed residential development advances key Lee Plan directives related to:

- Groundwater protection and recharge (consistent with Lee Plan Goals 33 and 63)
- Surface water quality improvement (consistent with Lee Plan Goals 60 and 61)
- Preservation and ecological restoration (consistent with Lee Plan Goal123)
- Reclamation and beneficial reuse of disturbed lands (consistent with Lee Plan Objective 10.1)
- Encouragement of development that enhances DR/GR environmental functions (consistent with Lee Plan Objective 33.1)

The project's stormwater management system will utilize the existing mine pits for stormwater treatment and attenuation, thereby improving water quality and providing substantial flood storage capacity. This approach is consistent with Lee Plan Goals 60 and 61 and promotes enhanced water quality and improved stormwater management. Routing treated stormwater into the limestone pits will also increase infiltration and support protection of the Surficial Aquifer, consistent with Goals 33 and 63, which emphasize groundwater recharge and resource protection within DR/GR lands. In addition, extensive nuisance and exotic vegetation removal, together with ecological restoration of disturbed areas, aligns with Goal 123, which encourage restoration and enhancement of degraded natural systems.

The development's proposed use of both stormwater and groundwater for irrigation reduces aquifer stress and supports water conservation. This aligns with Lee Plan Goal 60 (surface water management) and Goal 63 (groundwater protection). The centralized irrigation system promotes landscape water use efficiency and prevents over-irrigation, furthering water conservation and efficient water management. In addition, the proposed quarterly surface water quality monitoring and annual reporting support the Lee Plan's objectives under Goal 61 to maintain and improve surface water quality.

In summary, the project is expected to deliver the following water resource and environmental benefits:

- **Improved surface water quality and attenuation:** The engineered stormwater management system will utilize the existing limestone mining pits for treatment and attenuation, resulting in improved surface water quality and increased flood storage capacity. The storage available within the water-filled mine pits will help address historic flooding concerns while also improving water quality conditions, including increased DO.
- **Enhanced groundwater recharge and aquifer protection:** Routing treated stormwater into the historic limestone pits will promote mixing, increase infiltration, and enhance recharge to the shallow aquifer system. This approach leverages the storage capacity created by past excavation and its penetration into the underlying aquifer (see Integrated Modeling Report provided separately).
- **Restoration of degraded ecological conditions:** Due to the site's disturbed condition, significant nuisance and exotic vegetation occurs throughout the uplands and disturbed wetland areas. Removal of this vegetation will support both hydrologic and ecological restoration across the project site.
- **Conjunctive use of groundwater and stormwater for irrigation:** The development proposes to use both groundwater and captured stormwater for irrigation, with groundwater serving only as a supplement to surface water supplies stored within the project's lakes. Irrigation withdrawals will occur from these lakes, conserving groundwater withdrawals from the Lower Tamiami Aquifer and contributing to the project's overall resource benefits.
- **Master-controlled irrigation system promoting water conservation:** A master-controlled irrigation system will regulate the initiation and duration of irrigation events, increase water-

use efficiency and prevent individual homeowners from adjusting irrigation timers. Future enhancements may include integrated communication between the surface water pump station controllers and the augmentation well pump stations.

- **Enhanced Lake Management Practices and ongoing water quality monitoring:** The project includes Enhanced Lake Management Practices designed to protect water resources on site. This plan provides for quarterly surface water quality monitoring of the existing water-filled limestone pits. Monitoring results will function as an early-warning system for potential resource impacts and will be submitted after each sampling event and summarized in an annual report.

Collectively, these measures deliver a level of water resource and environmental protection that not only meets but exceeds the future land use standards envisioned in the Lee Plan.

2.0 PROPERTY SETTING

Prior to anthropogenic alterations, the southern portion of Lee County's DR/GR area, including the CREW Flint Pen Strand, was generally characterized by a complex mosaic of wet prairies, marshes, and cypress forests, interspersed with isolated, slightly elevated areas of open rangeland and Pine Flatwoods. As shown on the pre-development 1958 historical aerial photograph (**Figure 3**), the project site consisted of Hydric Flatwoods and Cypress Communities, punctuated by elongated Pine Flatwoods "islands" corresponding to slightly elevated historic marine deposits. Defined surface water flow-ways or conveyance features, common in DR/GR areas further north, were not evident on the project site. Instead, historic surface water movement appears to have occurred as dispersed sheet flow around the Flatwoods islands.

This unique historic landform in the project vicinity likely originated as relict coastal dunes deposited roughly parallel to historic shorelines. These dunes formed elongated, gently sloping sand ridges that are presently occupied by Pine Flatwoods. Due to their isolated nature, these ridges are hereafter referred to as "islands." They appear to have been superimposed on a nearly level marine terrace, which over time developed into the Hydric Flatwoods and Cypress Community wetlands characteristic of southern DR/GR lands. Post-depositional erosion and dissolution of the underlying Tamiami Formation limestone likely accentuated elevation differences between the dunes and surrounding wetlands, further defining the Flatwoods islands.

Historic surface water sheet flow was significantly altered in the early 1960s with the excavation of the Kehl Canal. As shown in **Figure 4**, the canal was constructed to extend and define the Imperial River watershed and to drain lands to the east. In combination with the extension of East Terry Street, the Kehl Canal appears to have completely cut off and isolated the subject property from the northern DR/GR lands, including the CREW. Flow records for the Kehl Canal indicate high seasonal variability. During drought conditions, the canal can exhibit virtually no flow, whereas wet season flows have been reported to reach approximately 1,500 cubic feet per second (cfs).

Average monthly flows in the Kehl Canal range from as low as 0.2 cfs during the dry season to approximately 1,300 cfs during the rainy season (CH2M HILL, July 1996). The canal not only intercepts overland surface water flows from the north but also lowers Water Table Aquifer levels in

its vicinity, further affecting the hydrology of nearby wetlands. This hydrologic isolation has contributed to the property's presently altered conditions and supports the Applicant's proposed removal of the project area from the DR/GR classification. Evidence of this alteration is apparent in 1968 aerial imagery (**Figure 4**), which shows many of the Flatwoods islands appearing drier, with exposed, light-colored soil boundaries likely caused by desiccated soils.

Prior to 1980, the project site was cleared of vegetation for limestone mining, resulting in the creation of two rectangular pits. Upon cessation of mining, approximately 15 acres (30 percent) of the site became water-filled mining pits. Additional mining-related disturbances, including areas stripped of overburden, debris piles, and drainage ditches, have further altered the property. The post-mining topography is clearly evident in the LiDAR imagery provided as **Figure 5**. Current land surface elevations are variable due to mining but generally range from 12 to 13 feet North American Vertical Datum (NAVD).

The predominant soil type within the project area is Pompano Fine Sand, as identified by the Natural Resources Conservation Service (NRCS). Soils of the Pompano series are very poorly drained and developed from thick, nearly level sandy marine sediments. The Pine Flatwoods "islands" are underlain by Immokalee Sands, which are poorly drained soils also formed from sandy marine sediments. The NRCS soils map is shown in **Figure 6**. According to the Federal Emergency Management Agency's (FEMA) National Flood Hazard Map, the property lies within Flood Zone X, an area of minimal to moderate flood risk.

The project site is located within the State of Florida's WBID No. 3258E (Imperial River). A WBID represents a sub-watershed delineated by the FDEP based on U.S. Geological Survey (USGS) Hydrologic Unit Codes (HUCs). Surface water quality evaluations within WBID No. 3258E have verified the watershed as impaired for DO, with an established total maximum daily load (TMDL) for this constituent. Low DO in surface waters is often caused by nutrient enrichment but can also occur naturally in slow-moving, tannin-stained waters with deposits of decaying vegetation, such as swamps and sloughs. The project area's highly disturbed condition and water-filled mining pits may contribute to low DO levels. Implementation of the proposed development is expected to improve site conditions by restoring hydrologic connectivity among surface water basins and increasing mixing through the engineered stormwater management system.

3.0 HYDROGEOLOGY

Three (3) principal aquifer systems underlie the project site:

- Unconfined Surficial Aquifer System (also known as the Water Table Aquifer)
- Confined Intermediate Aquifer System
- Confined Upper Floridan Aquifer System

In southern Lee County, groundwater quality generally decreases with depth. Suitable sources for irrigation and potable water are typically located at depths less than 300 feet, while deeper units tend to be highly mineralized and saline. As a result, groundwater withdrawals are primarily focused on the shallow Surficial Aquifer System (Water Table Aquifer) and the semi-confined Lower Tamiami

Aquifer. Beneath the Lower Tamiami, a relatively fresh, confined producing zone known as the Sandstone Aquifer also exists. These shallower aquifer systems are further described below.

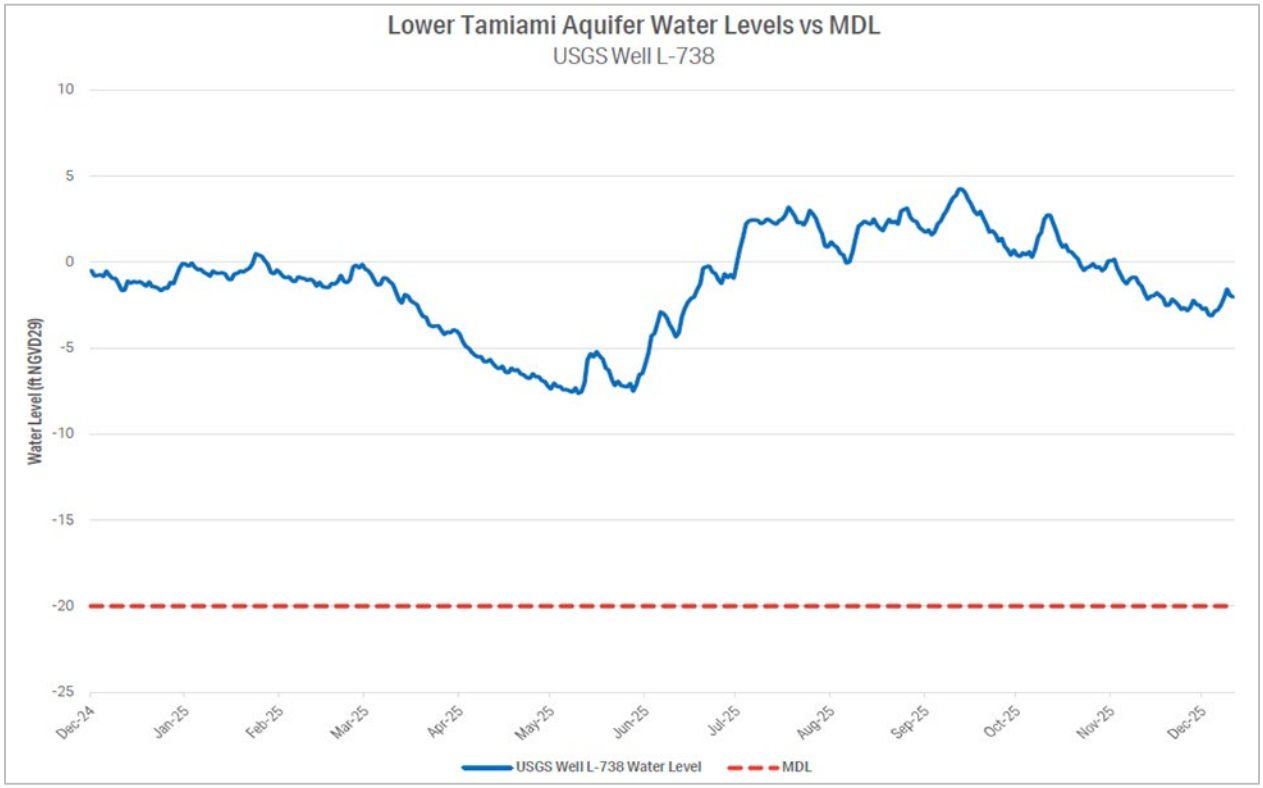
3.1 UNCONFINED WATER TABLE AQUIFER

The unconfined Water Table Aquifer originates at land surface and consists of 8 to 10 feet of unconsolidated surficial deposits of fine-grained, silty quartz sand with minor shell content. Thin, discontinuous clayey sands may overlay the uneven limestone of the upper Tamiami Formation, which includes the Ochopee and Buckingham Limestone Members and the Pinecrest Sand Member (FGS Special Publication No. 49). Water quality is fresh in areas not affected by saline intrusion, with dissolved chloride concentrations ranging from 10 to 70 milligrams per liter (mg/L). The Water Table Aquifer is highly productive. Onsite limestone mining excavated portions of the upper Tamiami Formation.

3.2 LOWER TAMIAMI AQUIFER

Beneath the upper Tamiami Formation, there are semi-confining clays and low-permeability sediments, known as the Bonita Springs Marl, which overlie the Lower Tamiami Aquifer. This aquifer is distinct from the overlying limestone and is highly productive. Water quality varies with proximity to tidally influenced water bodies, with dissolved chloride concentrations ranging from approximately 40 to 100 mg/L in non-saline areas. The Bonita Springs Marl reduces the potential for withdrawals from the Lower Tamiami Aquifer to induce drawdown in the overlying Water Table Aquifer and prevents adverse impacts to wetlands. The project's proposed irrigation system will utilize two (2) Lower Tamiami Aquifer augmentation wells to supplement surface water supplies from the stormwater management lakes - historic mining pits. It must be noted that Bonita Springs Utilities (BSU) operates a potable wellfield (Eastern Wellfield) that utilizes the Lower Tamiami Aquifer under SFWMD Water Use Permit No. 36-00008-W. To protect potable water supplies, Lee County has instituted wellfield protection zones (Lee Plan Map 4-C). As shown on **Figure 7**, due to the proximity of City of Bonita Springs wellfield, the Lee Plan 5- and 10-year travel time protection zones extend onto the subject property. No adverse drawdown or water quality impacts are anticipated to occur to City of Bonita Springs wellfield as a result of the proposed development.

Groundwater level data from the USGS Lower Tamiami Aquifer monitoring well No. L-738, located approximately 3 miles west of the subject property, indicate that long-term groundwater elevations have consistently remained above the established Maximum Developable Limit (MDL). These conditions demonstrate that groundwater resources in the vicinity of the site are being adequately maintained and that no groundwater quantity or water resource constraints are anticipated that would adversely affect the proposed development. A recent hydrograph for monitoring well No. L-738 is provided below. The location for monitoring well L-738 is shown in **Figure 1**.



3.3 SANDSTONE AQUIFER

The Sandstone Aquifer occurs within the Intermediate Aquifer System and lies below the Tamiami Formation and is separated from overlying aquifers by low-permeability clayey sediments. Depth to the top of this aquifer ranges from approximately 150 to 200 feet below land surface (bls), with thickness varying from 30 to 50 feet near the project site. It is composed of sandy limestone, sandstone, sandy dolomite, and calcareous sands, and is associated with the Peace River Formation of the Hawthorn Group (FGS Circular No. 103, 1986). Dissolved chloride concentrations generally range from 40 to 200 mg/L. Due to the occurrence of low-permeability sediments separating the Sandstone Aquifer from the overlying Water Table Aquifer, the potential for groundwater withdrawals from the Sandstone Aquifer to cause adverse drawdown in the Water Table Aquifer is considered remote.

3.4 EXISTING RECHARGE TO UNDERLYING AQUIFERS

The USGS estimates recharge at the site ranges from 0 to 3 inches per year (USGS/SFWMD, 1995). Due to the highly disturbed condition of the site, effective recharge to the Water Table Aquifer (and underlying Lower Tamiami Aquifer) is likely limited.

3.5 CONSISTENCY WITH LEE PLAN POLICIES 2.3.1 AND 2.3.2

The proposed Comprehensive Plan Amendment is consistent with Lee Plan Policies 2.3.1 and 2.3.2, which require that amendments in areas important for groundwater protection, including areas within the DR/GR area to demonstrate that the development will not adversely affect groundwater availability, recharge functions, or potable supply resources.

3.5.1 POLICY 2.3.1 – PROTECTION OF POTABLE WATER SOURCES

The SFWMD 2022 Lower West Coast Water Supply Plan Update identifies the Lower Tamiami Aquifer as a traditional freshwater resource that is incorporated into long-range planning for Lee County and the DR/GR. 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.

3.5.2 GROUNDWATER RESOURCE PROTECTION AND IMPACT EVALUATION

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.

The project will also incorporate efficient water use practices, including a master-controlled irrigation system whereby no individual homeowner can initiate or prolong irrigation cycles, and the conjunctive use of surface water (detained stormwater) for irrigation, thereby minimizing groundwater withdrawals and ensuring protection of DR/GR recharge functions. Therefore, the proposed withdrawals are consistent with Policy 2.3.2.

The Lower Tamiami Aquifer's favorable hydrogeologic characteristics, its planned use in regional water-supply strategies, and the modest irrigation demand associated with the proposed development collectively demonstrate that the project's groundwater use is sustainable, low-impact, and fully compatible with the protective intent of Lee Plan Policies 2.3.1 and 2.3.2, including the County's goals for safeguarding the DR/GR groundwater resource area.

4.0 PROPOSED IRRIGATION DEMANDS AND SOURCES

A review of existing reclaimed water pipelines indicates that none are located in proximity to the subject property. Therefore, all irrigation supplies must be derived onsite. As shown on the Applicant's Concept Plan provided as **Figure 8**, stormwater will be treated within the reconfigured limestone mining water-filled pits. These surface water bodies afford an opportunity for stormwater capture and reuse for irrigation. However, during prolonged droughts, surface water supplies for irrigation are anticipated to be limited. Therefore, supplies are proposed to be augmented by the use of groundwater from the Lower Tamiami Aquifer. It is estimated that two (2) Lower Tamiami Aquifer wells will be required to irrigate an estimated landscaped area of approximately of 7.2 acres.

Using the SFWMD Blaney-Criddle irrigation allocation calculator, a preliminary estimate of the development's irrigation demand is approximately 25,974 gallons per day (gpd), with a peak dry season (maximum month) demand of approximately 1.18 million gallons. Considering the combined surface areas of the stormwater lakes and reconfigured mine pits portrayed in the conceptual development layout (**Figure 8**), the estimated daily irrigation demand of 25,974 gallons would only lower the combined surface water bodies by less than an inch each day. The SFWMD Blaney-Criddle irrigation documentation s provided as **Attachment A**.

The proposed conjunctive use of both ground and surface water supplies is anticipated to conserve groundwater resources proposed to be derived from the Lower Tamiami Aquifer when adequate surface water supplies are readily available, thereby furthering the project's resource benefits. In addition, the project proposes a master-controlled irrigation system that will regulate both the initiation and overall duration of irrigation events in order to increase irrigation water use efficiency and enhance water conservation (i.e., no individual homeowner will have access to irrigation timers).

5.0 GROUNDWATER FLOW MODELING

To demonstrate that the proposed use of the Lower Tamiami Aquifer for supplemental irrigation will not cause adverse impacts to surrounding existing legal users, a single-layer groundwater flow model was developed using capabilities of AquiferWin32 to evaluate potential drawdown impacts resulting from the proposed maximum monthly withdrawals. The analytical groundwater modeling scenario includes one stress period that represents transient / future or proposed conditions and was run for 90-days with no recharge to simulate the maximum monthly allocation for the three driest months of the year (March, April, and May). The Hantush and Jacob, 1955 (Leaky Aquifer) solution was utilized in this modeling scenario.

The results of the 90-day maximum monthly modeling scenario are shown for the Lower Tamiami Aquifer in **Figure 9**. The greatest drawdown predicted to occur as a result of the requested maximum month quantity is approximately 0.05 feet and occurs within the property boundary at the proposed well nodes. Per Section 3.1.2 of the SFWMD's Applicant Handbook, modeling analyses must include proposed wells, as well as any other permitted groundwater withdrawals within the "cone of depression" of proposed use. SFWMD defines the "cone of depression" of the proposed use as the 1.0-foot drawdown contour for confined aquifer systems. However, as shown in **Figure 9**, no drawdown greater than 1.0 foot is predicted as a result of the maximum monthly groundwater model. Therefore, the potential for harm to occur to existing legal users as a result of the requested allocation is considered to be de minimis and not adverse and a cumulative impact assessment was not performed.

A statement from a Professional Geologist certifying the results of these groundwater flow modeling scenarios is provided herein as **Attachment B**, and the required modeling files will be provided to District staff under a separate cover.

6.0 BONITA SPRINGS EASTERN WELLFIELD PROTECTION

The Bonita Springs Eastern Wellfield is a critical public water supply facility serving southern Lee County and the City of Bonita Springs. The proposed residential development is located within the

5- and 10-year groundwater travel time zones for the wellfield and has been evaluated for consistency with the Lee County Comprehensive Plan (Lee Plan) and the Lee County Land Development Code (LDC) wellfield protection standards applicable to public water supply facilities.

The proposed residential use is a permitted and compatible land use within the designated travel time zones and complies with Lee County's Wellfield Protection Ordinance and LDC provisions regulating development within wellfield protection areas. The development avoids prohibited or restricted land uses identified in the LDC that could pose an unreasonable risk to groundwater quality or the operation of public water supply wells. No industrial uses, bulk fuel storage, hazardous waste facilities, chemical manufacturing, or other high-risk activities regulated or prohibited by the LDC are proposed.

In accordance with the Lee Plan and applicable LDC utility requirements, the development will be served by centralized potable water and centralized sanitary sewer service. The use of central sewer eliminates on-site wastewater treatment systems and septic tanks, thereby reducing the potential for nutrient loading, pathogens, or other contaminants to enter the groundwater within the wellfield travel time zones, consistent with LDC wellfield protection objectives.

Hazardous material use and storage within the development will be limited to normal residential household quantities, consistent with LDC restrictions applicable within wellfield protection areas. No above-ground or underground fuel storage tanks, vehicle maintenance facilities, or bulk chemical storage are proposed. Any temporary construction-related fueling, equipment servicing, or material storage will comply with LDC spill prevention, secondary containment, and cleanup requirements to protect groundwater quality.

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.

During site clearing, grading, and construction activities, erosion control, sediment management, and spill prevention best management practices required by the LDC will be implemented to prevent contaminants from entering surface waters or the groundwater system. Landscaping and site maintenance will comply with LDC landscaping standards and Lee County fertilizer regulations, with an emphasis on native or low-input plant species to reduce irrigation and fertilizer demands and minimize nutrient loading to groundwater.

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.

Through compliance with the Lee Plan and the LDC wellfield protection standards, the proposed residential development ensures that land use within the 5- and 10-year travel time zones of the Bonita Springs Eastern Wellfield protects public drinking water supplies, minimizes contamination risk, and supports long-term potable water sustainability.

7.0 ENHANCED LAKE MANAGEMENT PRACTICES

In order to protect water resources, the following management practices are proposed for the development's stormwater lakes. It is important to note that, as the development evolves, the Best Management Practices (BMPs) proposed to protect water resources must also evolve. The following management actions provide a framework of ground and surface water protection measures that will not only safeguard but help to sustain water resource conditions. Please note that no motorized boats will be allowed on any of the project's stormwater management lakes.

Through adherence to these BMPs, the project will maintain stormwater and groundwater quality, comply with Lee County LDC and Wellfield Protection Ordinance standards, and ensure long-term protection of water resources in accordance with the Lee Comprehensive Plan. The Developer's designated maintenance entity (Community Development District [CDD] or Homeowners Associaton) will be responsible in perpetuity for the operation and maintenance of all stormwater management facilities, including regular inspection, maintenance, and surface water quality monitoring.

7.1 WATER RESOURCES BEST MANAGEMENT PRACTICES

As the project progresses from predominately a "construction phase" to "partial construction" and then ultimately to a "post-construction" phase, the BMPs must change to sustain the water resource protection measures. Construction of the proposed stormwater management system will occur relatively quickly. However, it is important that proper management practices be maintained to safeguard the water resources through the long-term operational phase.

7.1.1 CONSTRUCTION PHASE BMPS

All construction activities will comply with Lee County Wellfield Protection Ordinance No. 07-35, in accordance with Section 14-214 for Protection Zone No. 1 and Section 14-208 requirements for handling, storage, and use of regulated substances. The general contractor will ensure that all contractors and subcontractors evaluate site conditions prior to starting work to minimize risks to water resources and that any regulated substances are stored and handled in a manner that prevents accidental releases.

Contractors will maintain spill containment and cleanup equipment onsite and will be familiar with manufacturer safety data sheets and procedures for handling accidental releases. Any spill of a regulated substance will be reported immediately to the Developer, who will notify the Lee County Division of Natural Resources and the FDEP.

7.1.2 POST-CONSTRUCTION PHASE BMPS

Upon completion of construction, all remaining regulated substances and containment systems will be removed from the site. Turbidity control, erosion management, and stormwater protection measures consistent with SFWMD, FDEP National Pollutant Discharge Elimination System (NPDES) permits, and Florida Stormwater Sedimentation Control standards will be implemented throughout construction until vegetation or other stabilization measures are established.

After the issuance of the Lee County Certificate of Compliance or SFWMD Stormwater Management System Certification, the project will transition to the post-construction phase, with the primary focus being the maintenance of the stormwater management lakes and associated conveyance and control structures.

7.2 LAKE MAINTENANCE

Proper maintenance of stormwater wet detention areas is essential in Florida to ensure long-term water quality protection and flood control. These systems are designed to capture and treat runoff by allowing suspended solids, nutrients, and other pollutants to settle before the water is discharged downstream. Without regular upkeep, such as managing vegetation, removing accumulated sediment, and maintaining control structures, detention ponds can lose storage capacity and treatment efficiency, leading to degraded water quality and increased flood risk. Routine maintenance of these areas helps preserve the ecological function of these systems and supports compliance with state and local water management regulations.

7.2.1 NUISANCE AND EXOTIC VEGETATION CONTROL

The controlling entity will be responsible for the removal (in perpetuity) of all nuisance and exotic vegetation from the stormwater management system as defined by the Lee County LDC.

The stormwater lakes must be inspected annually, and any prohibited vegetation must be removed by the use of hand-clearing or appropriate chemical treatment. Only aquatic-approved compounds may be utilized in the stormwater management system lake. Herbicides and/or algaecides may only be applied by a licensed professional applicator who meets the requirements of Lee County, and in accordance with manufacturer specifications. All applicable local, state and/or federal guidelines and requirements will also be followed.

7.2.2 LITTORAL VEGETATION PRESERVATION

Littoral zone vegetation is required to be installed and maintained. The littoral zone provides habitat for wading birds, fish and aquatic invertebrates. Littoral vegetation also helps stabilize the lake shoreline and helps prevent erosion.

Littoral plants that die will be replaced in accordance with Lee County LDC requirements. The presence of littoral plants in the lake is desirable and may also help to improve the water quality. The spread of littoral plants will be encouraged throughout the designated littoral areas. Mechanical trimming, mowing or the use of land-based herbicides on desirable littoral plants is prohibited. Any trimming or removal of vegetation required to promote the survival and viability of littoral vegetation will be performed by hand or by approved aquatic herbicides and methods.

7.2.3 FERTILIZER APPLICATION

Strict adherence will be maintained with Lee County's Fertilizer Ordinance No. 08-08. Any person(s) applying fertilizers must have received a limited certification in compliance with Florida Statute (F.S.) 482.1562 prior to application of any and all fertilizers.

All professional landscape businesses must register with Lee County prior to performing landscape fertilization services within unincorporated Lee County. At least one (1) employee of a firm employed to perform landscape fertilization services must be a Certified Professional Landscaper. Proof of completion of a Lee County-approved BMP training program must be provided to the Division of Lee County Natural Resources. At least one (1) BMP-trained employee must be present onsite while fertilizers are applied. A registration decal provided by the division must be displayed on all company vehicles.

7.3 EROSION PROTECTION AND LAKE BANK MAINTENANCE

Lake banks are generally susceptible to erosion due to overland flow of stormwater runoff, wave action, and the natural seasonal fluctuation of water levels. Accordingly, lake banks are designed to minimize this potential for erosion.

Lake banks will be inspected annually to identify areas of erosion. Once identified, the erosion will be repaired and the source of erosion shall be eliminated, if possible. Where excessive erosion occurs, repair of the lake banks and/or enhancement of stabilization measures may be necessary.

7.4 PESTICIDE, HERBICIDE AND/OR FUNGICIDE APPLICATIONS

All applications of pesticides, herbicides, algaecides and/or fungicides shall be applied by a licensed professional applicator, meet the requirements of Lee County, be applied in accordance with the manufacturer's specifications, and shall meet all applicable local, state and/or federal guidelines and requirements. Only approved aquatic herbicides may be used to treat the stormwater management system. The following BMPs are part of an Integrated Pest, Disease, and Herbicide Program.

The application of pesticides, herbicides and/or fungicides will only be performed by certified contractors. The use of any chemical product in a manner that will allow airborne or waterborne entry of such products into the surface water management system is prohibited. This requirement shall not apply to the chemical agents used by certified lake management specialists for the control of algae and nuisance vegetation within the stormwater management system lakes. However, application of such agents shall be in compliance with the requirements of Lee County, applied in accordance with the manufacturer's specifications, and meet all applicable local, state and/or federal guidelines and requirements. Pesticides, fungicides, and herbicides will be used only in response to a specific problem and in the manner and amount recommended by the manufacturer. Broad application of pesticides, fungicides and herbicides as a preventative measure is strongly discouraged.

8.0 SURFACE WATER QUALITY MONITORING

8.1 GENERAL DATA QUALITY OBJECTIVES

All surface water quality samples will be collected in accordance with Chapter 62-160, Florida Administrative Code (F.A.C.), and the FDEP's Standard Operating Procedures (SOPs) DEP-SOP-001/01 FQ 100 Field Quality Control Requirements. Surface water quality sampling will be performed four (4) times per year (March, June, September, and December).

The purpose of the surface water monitoring program is to assure stormwater discharges from the subject property meet all applicable requirements of Chapter 62-302, F.A.C., Surface Water Quality Standards, before discharging surface water from the stormwater management system.

Additionally, monitoring will verify the efficacy of the BMP's described above. Please note that if there is no flow observed from the outfalls at the time of sample collection, the "no -flow" condition will be noted, and no surface water sample will be taken. If flow has occurred in the last 30 days, a sample shall be collected just upstream of the control structure to represent the discharged water.

8.2 SURFACE WATER QUALITY MONITORING

As shown in **Figure 10**, baseline water quality samples will be collected from both lakes. Both locations will then be sampled four times per year (March, June, September, and December). Surface water quality grab samples will be collected per FDEP SOP protocol and analyzed by a National Environmental Laboratories Accreditation Conference (NELAC/TNI)-certified laboratory. The surface water quality parameters to be tested, as well as the laboratory's Accuracy, Precision, and Minimum Method Detection Limit (MDL), are summarized in **Table 1**. Please note that the Practical Quantitation Limit (PQL) for each parameter varies between laboratories; however, the PQL typically equates to four times the MDL.

Field Parameters – Depth of Water, DO, pH, Temperature, Specific Conductance, and Turbidity

Lab Parameters –Ammonia, Biological Oxygen Demand, Chloride, Copper, Iron, Nitrate + Nitrite, Ortho-phosphate, Total Kjeldahl Nitrogen, Total Phosphorus, and Zinc

Quarterly surface water quality monitoring shall be continued for a minimum of five (5) years after operational completion of the stormwater management system. After five (5) consecutive years of testing, a request for modification in the monitoring requirements may be proposed to the Lee County Natural Resources Department if it can be demonstrated that surface water quality is being maintained within applicable State standards. All surface water quality data will be supplied to Lee County as described below.

8.3 WATER QUALITY DATA REPORTING AND ANALYSIS

Surface water quality data will be submitted to Lee County Natural Resources Department staff in an approved electronic format within 30 days of receiving the water quality results from the contract laboratory. The submittal will include all field notes and field and laboratory water quality results, as well as all previously collected water quality data (i.e. the period of record). The submittals will also include a brief narrative on the most recent sample collection, sample chain of custody,

descriptions of any re-testing of erroneous values, and any water quality exceedances. Water levels will be provided in tabular and graphical forms.

By March 1 of each year, a Water Resource Summary Report for the preceding calendar year shall be supplied to Lee County Natural Resources staff that summarizes the surface and groundwater monitoring results for the development. The results will include a summary table that lists all the field and laboratory parameters for surface water, consistent with requirements of F.A.C. 62-160. Laboratory parameter concentrations that fall below the PQL for that parameter will be reported with no value; however, a value qualifier of "I" (between the MDL and PQL) or "U" (below the MDL) will be included in the summary table.

All water quality data for the analytes listed in **Table 1** that are detected in concentrations above the laboratory PQL will be reviewed, graphed and statistically analyzed for trends and exceedances above two (2) standard deviations of the mean of all values above the MDL. Any reported concentrations above the MDL will be clearly identified as well as remedial actions that were used to timely reduce that particular analyte's concentration.

8.4 REMEDIAL ACTIONS

In the event of significant surface water impact from hydrocarbon spills, pesticide or herbicide applications, or other releases, the Developer or their successor will notify the Lee County Natural Resources Division within 12 hours (or the next business day) and FDEP Office of Emergency Response within 24 hours if there is an immediate threat to human health or the environment. The Developer or their successor will coordinate assessment and remediation with Lee County and comply with all local, state, and federal permitting requirements, including installation of temporary monitoring wells or more comprehensive investigations if needed.

9.0 EXISTING ONSITE WELLS

According to Lee County's Permitted Well database, four of the five parcels within the subject property are shown to contain a single well located near the parcel centroid and classified for "Single Family" use. Two of these reported wells are mapped within existing water-filled pits, and two are mapped on upland portions of the site. Review of the associated well construction permits and available records indicates that these features represent shallow geotechnical or hydrogeologic test borings rather than active or production water supply wells. The borings appear to have been installed for site investigation purposes, are not equipped with permanent pumping infrastructure, and are not utilized for potable or irrigation supply. As such, these test borings are not expected to adversely affect groundwater resources, interfere with proposed site development, or require abandonment or protection measures beyond standard construction practices.

10.0 CONCLUSIONS

The White Willow project presents a unique opportunity to restore and enhance a highly disturbed and hydrologically impacted property. As detailed above, the proposed development demonstrates a high level of protection, preservation, and enhancement of groundwater, surface water, and

environmental resources. The project is fully consistent with the Lee Plan, including Goal 63, which protects potable water sources and safeguards wellfield areas; and Goals 60 and 61, which preserve natural drainage systems and ensure stormwater management and water quality standards are met.

Additionally, the project complies with applicable Lee County LDC requirements, including Sections 14-208 and 14-214 governing Wellfield Protection Zones, as well as stormwater, erosion control, and lake management provisions. By incorporating these measures, the White Willow development not only supports compatible residential land use but also provides measurable improvements to site-specific hydrologic and ecological conditions, ensuring long-term protection and enhancement of critical water resources in southern Lee County.

Table 1 - Surface Water Quality Analytes and Proposed Schedule for Sampling

Field Parameters					
Parameter	Units	Precision (%RPD)	Accuracy (%Recovery)	MDL	Sampling Frequency
Depth of Water	Feet	0.01	NA	NA	Quarterly
Dissolved Oxygen	mg/L	FT 1000-1	FT 1000-1	NA	Quarterly
pH	SU	FT 1000-1	FT 1000-1	NA	Quarterly
Specific Conductance	µS/cm	FT 1000-1	FT 1000-1	NA	Quarterly
Temperature	Deg C	FT 1000-1	FT 1000-1	NA	Quarterly
Turbidity	NTU	FT 1000-1	FT 1000-1	NA	Quarterly
Laboratory Parameters					
Ammonia	mg/L	*17	90-110	0.008	Quarterly
Biological Oxygen Demand	mg/L	*28	84.6-115	1	Quarterly
Chloride	mg/L	*5	90-110	0.353	Quarterly
Copper	ug/L	*10	70-130	0.346	Quarterly
Hardness	mg/L	CALC	CALC	0.682	Quarterly
Iron	mg/L	*10	70-130	29	Quarterly
Lead	ug/L	*10	70-130	0.67	Quarterly
Nitrate + Nitrite	mg/L	*5	90-110	0.004	Quarterly
Ortho-phosphate	mg/L	*10	88-118	0.002	Quarterly
Total Kjeldahl Nitrogen	mg/L	*10	90-110	0.05	Quarterly
Total Phosphorus	mg/L	*10	90-110	0.008	Quarterly
Zinc	mg/L	*10	70-130	0.0014	Quarterly

*Value represents percent (%) relative standard deviation (RSD).

**All values within the table above were supplied by Benchmark Enviroanalytical Laboratory and are specific to the water quality laboratory that performs the analyses.

Figures

RESPEC

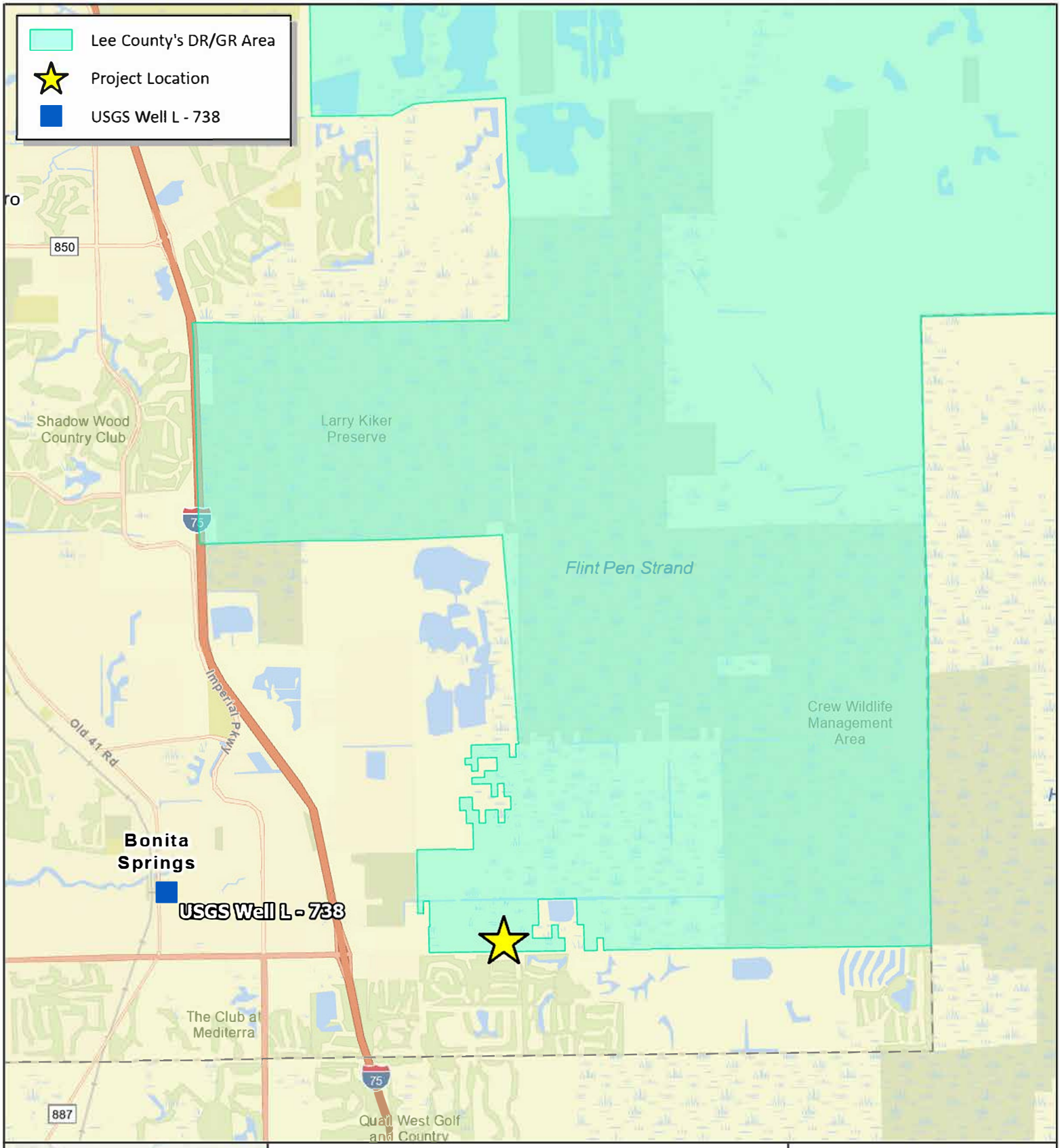




Figure 1
Density Reduction/Groundwater Resource Area
White Willow
Lee County, Florida

N

0 0.5 1 1.5 Mi

Scale: 1:80,000

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12/9/2025

Image: Esri, Lee County

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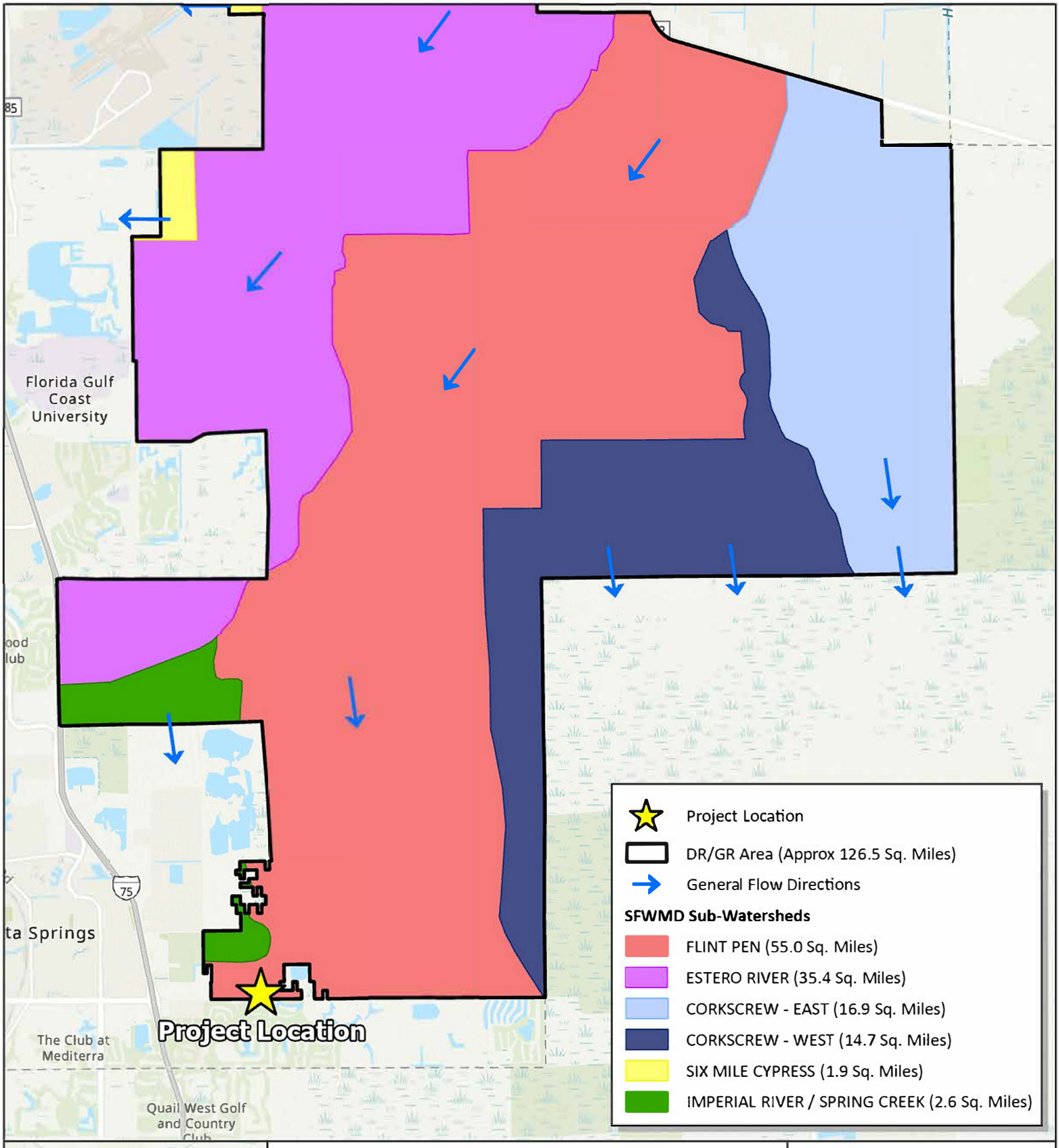




Figure 2
DR/GR Sub-Watersheds
White Willow
Lee County, Florida

N

0 1 2 Miles

Scale: 1:120,000

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Image: Esri

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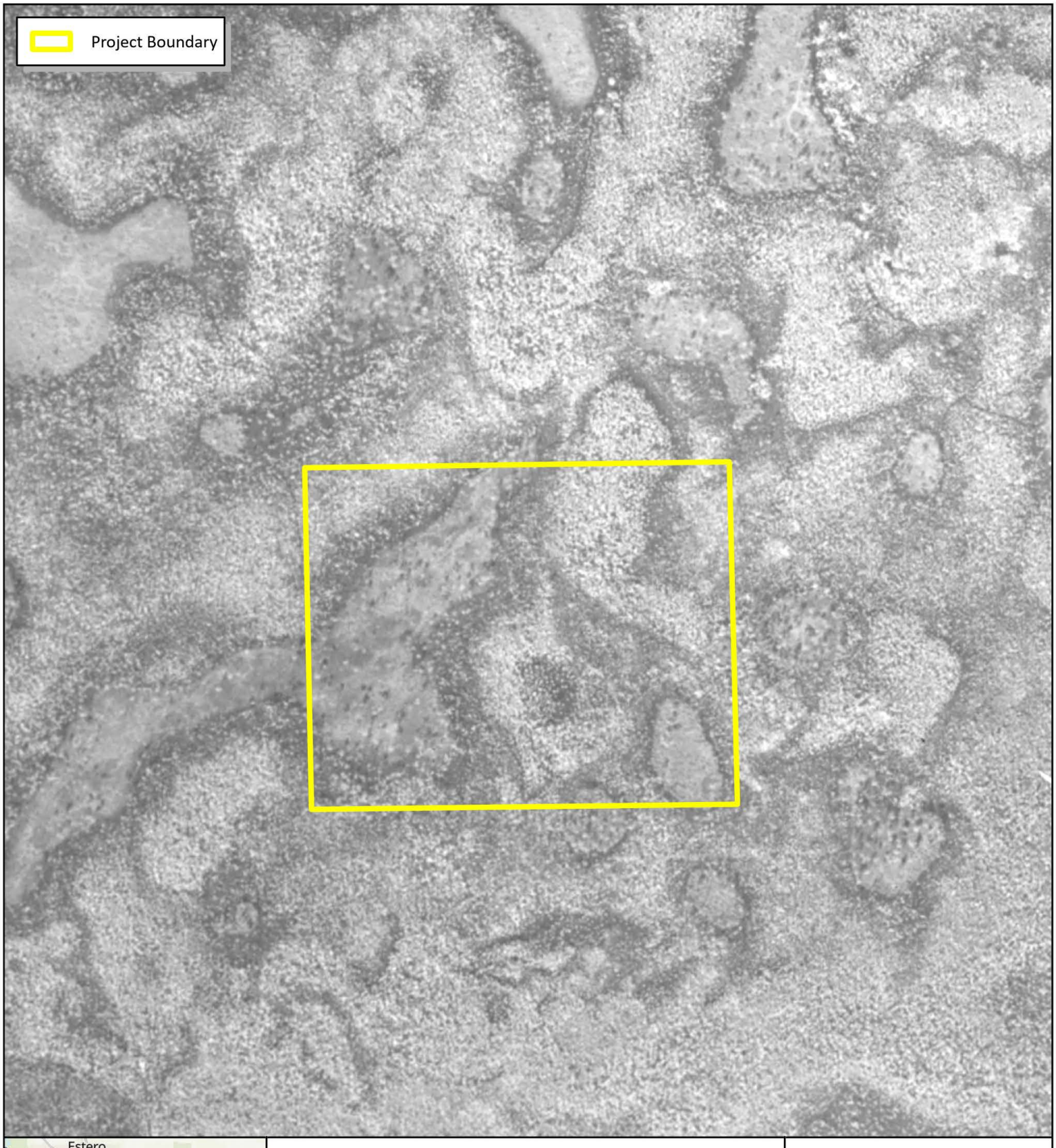




Figure 3
1958 Historic Aerial Imagery
White Willow
Lee County, Florida

N

0 500 US Feet

Scale: 1:6,000

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Image: Esri, UFDC

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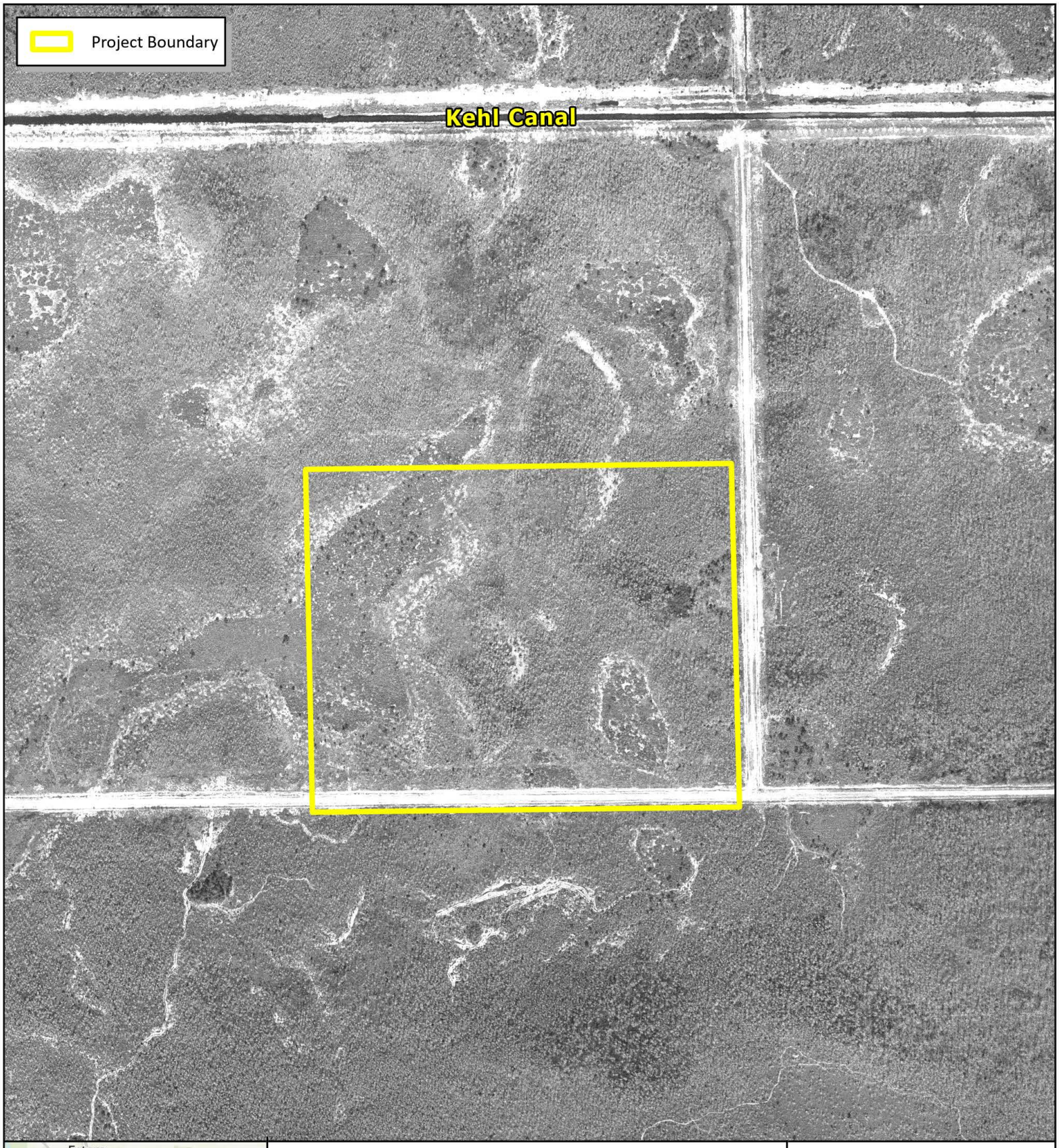




Figure 4
1968 Historic Aerial Imagery
White Willow
Lee County, Florida

N

0 500 US Feet

Scale: 1:6,000

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12/12/2025

Image: Esri, FDOT

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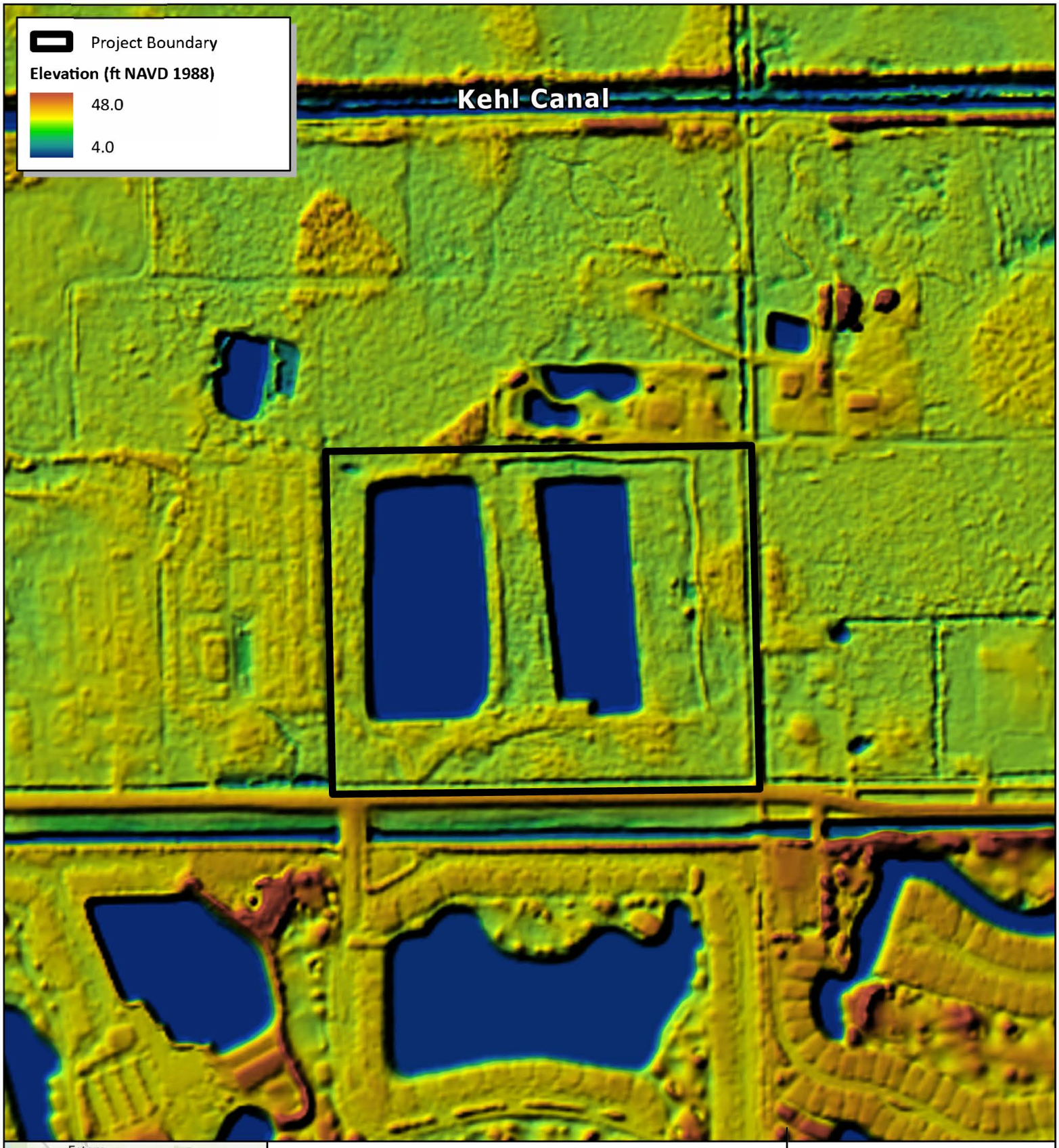




Figure 5
LiDAR
White Willow
Lee County, Florida

N

0 500 US Feet

Scale: 1:6,000

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Image: Esri, Lee County 10-ft DEM (ft NAVD88)

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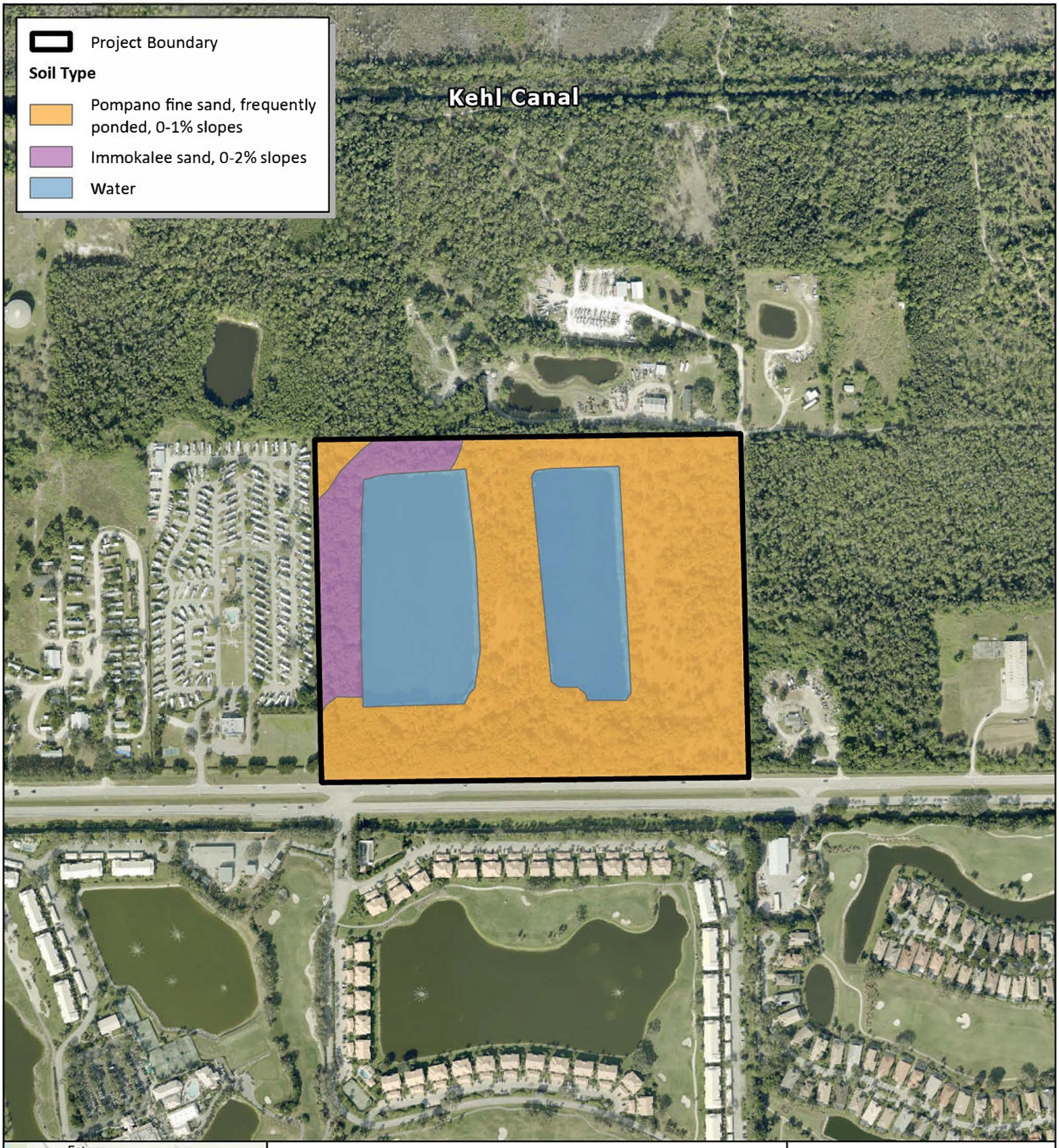




Figure 6
NRCS Soil Types
White Willow
Lee County, Florida

N

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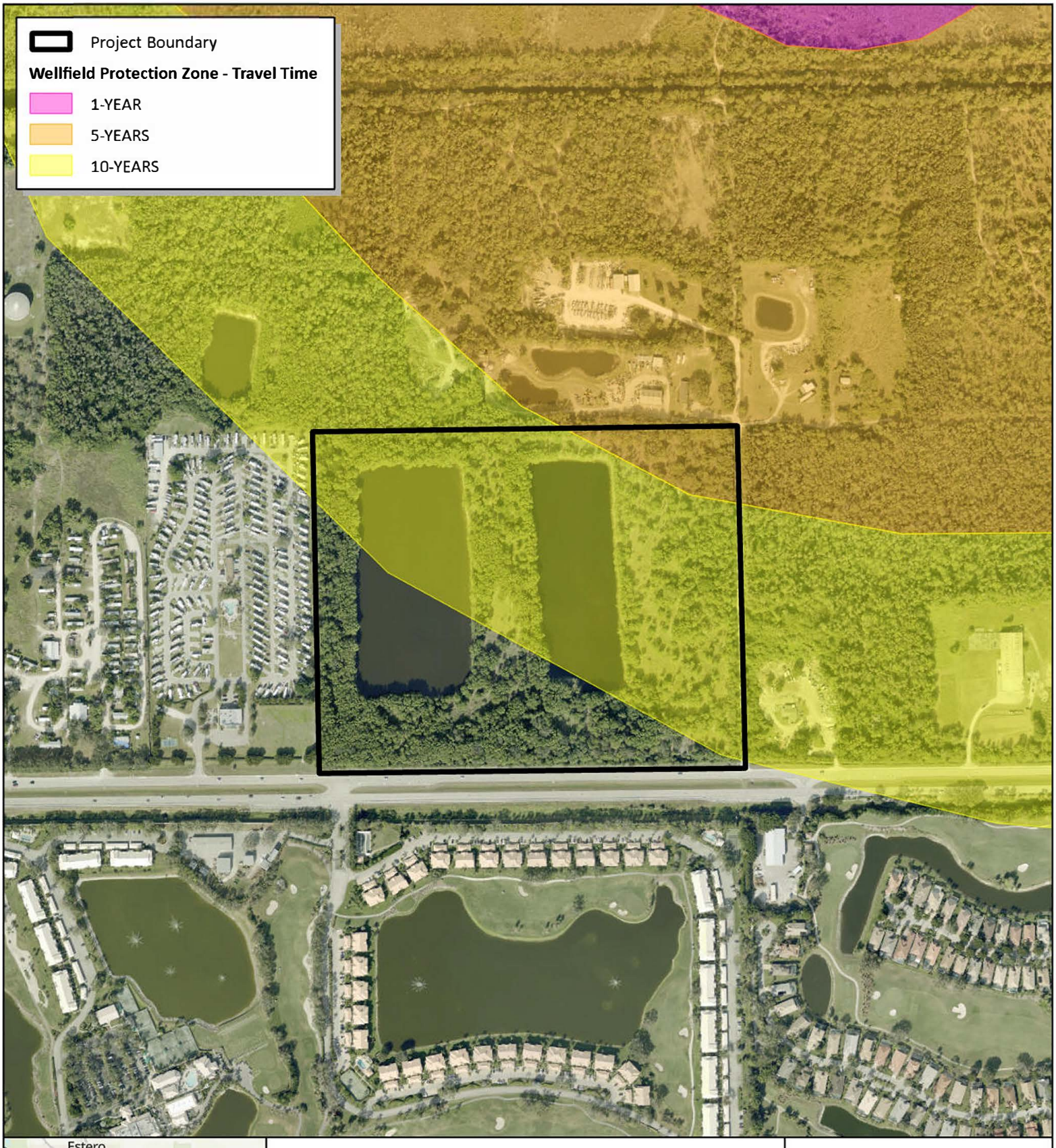
Scale: 1:6,000

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Image: Esri, NRCS

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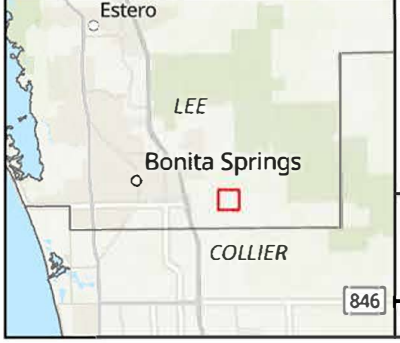


Figure 7
Wellfield Protection Zones
White Willow
Lee County, Florida

N

0 500 US Feet

Scale: 1:6,000

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Image: Esri

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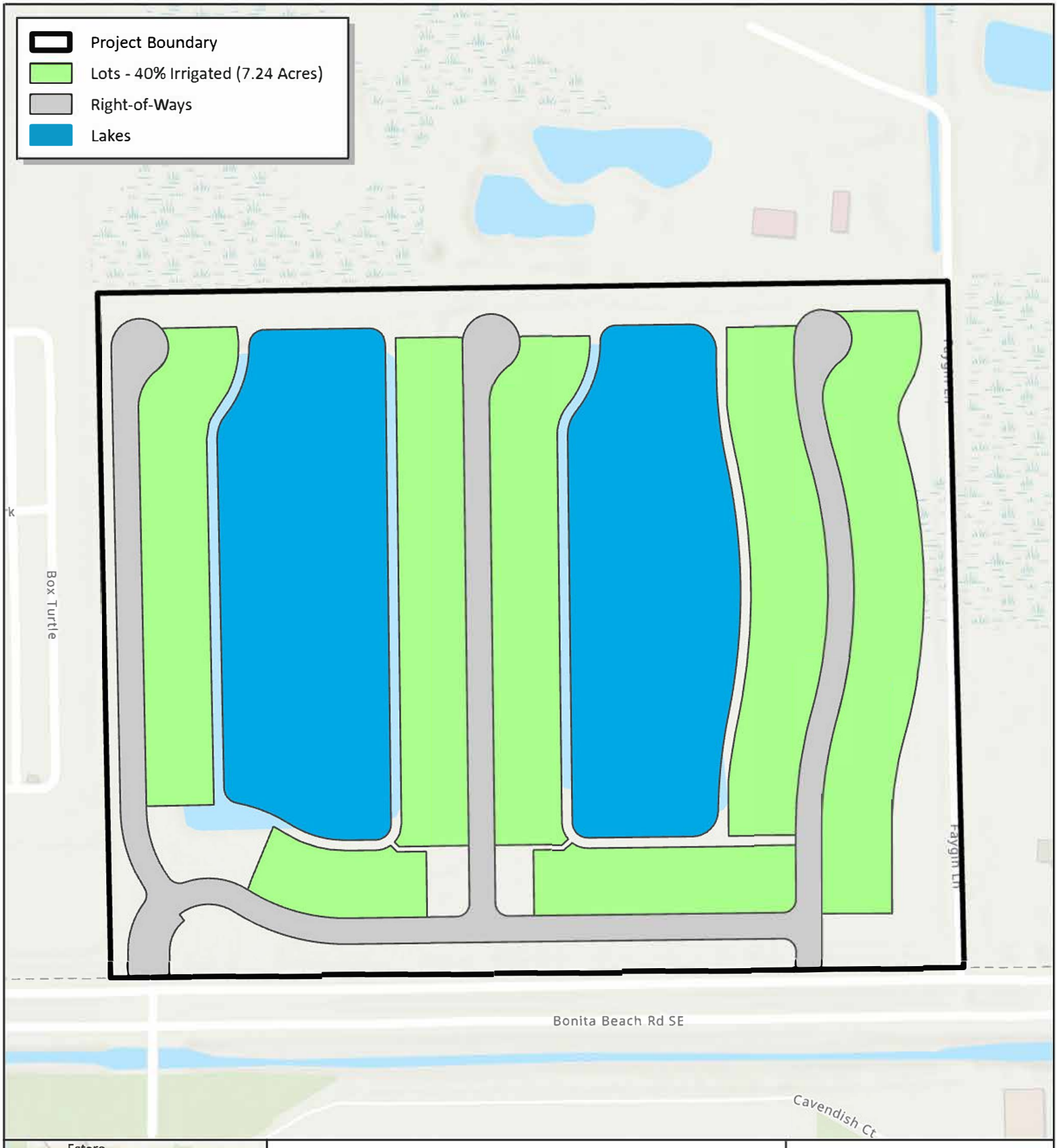


Figure 8
Conceptual Plan
White Willow
Lee County, Florida

N

0 250 US Feet

Scale: 1:3,000

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12/10/2025

Image: Esri

RESPEC



Figure 9
Predicted Lower Tamiami Aquifer Drawdown
Maximum Monthly Modeling Scenario
White Willow
Lee County, Florida

N

0 250 US Feet

Scale: 1:3,000

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12/15/2025

Image: Esri

RESPEC



Figure 10
Water Quality Monitoring Locations
White Willow
Lee County, Florida

N

0 250 US Feet

Scale: 1:3,000

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12/10/2025

Image: Esri

RESPEC

Blaney-Criddle Irrigation Demands

Attachment A

RESPEC

Calculations Of Irrigation Requirements (1-in-10)

Rainfall Station: Naples 1-in-10

Irrigation System: Sprinkler

Irrigated Acreage: 7.24

Crop: Turf Grass

Soil Type: 0.80

Multiplier 1.30

Efficiency 0.77

Calculations	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Average Rainfall (inches)	1.88	1.93	0.96	2.05	4.42	8.17	8.36	8.18	8.69	4.09	1.56	1.32	51.61
Evapotranspiration (inches)	1.93	2.21	3.76	5.09	6.66	7.44	7.88	7.51	6.47	5.00	3.22	2.26	59.43
Average Effective Rainfall (inches)	0.88	0.92	0.52	1.14	2.44	4.32	4.51	4.34	4.31	2.08	0.80	0.65	26.91
1-in-10 Effective Rainfall (inches)	0.73	0.76	0.43	0.94	2.03	3.58	3.75	3.60	3.58	1.73	0.66	0.54	22.33
Average Irrigation (inches)	1.05	1.29	3.24	3.95	4.22	3.12	3.37	3.17	2.16	2.92	2.42	1.61	32.52
1-in-10 Irrigation (inches)	1.20	1.45	3.33	4.15	4.63	3.86	4.13	3.91	2.89	3.27	2.56	1.72	37.10

1-in-10 Annual Supplemental Crop Requirement = 37.10 inches

Annual Supplemental Crop Water Use:

37.1 inches X 7.24 Acres X 1.3 X 0.02715 MG/AC-IN = 9.48 MG

1-in-10 Maximum Monthly Supplemental Crop Requirement = 4.63 inches

Maximum Monthly Supplemental Crop Water Use:

4.63 inches X 7.24 Acres X 1.3 X 0.02715 MG/AC-IN = 1.18 MG

Notes:

Evapotranspiration was calculated using a modified Blaney-Criddle method.
Average effective rainfall is the amount that is useful to crops in an average year.
Drought rainfall is the rainfall minimum representative of a 1-in-10 year drought
Drought effective rainfall is the amount that is useful to crops in a 1-in-10 year drought event.
Average irrigation is the net amount that should be required for maximum yields during an average year.
Drought irrigation is the net amount that should be required for maximum yields during a 1-in-10 year drought.

Professional Geologist Certification

Attachment B

RESPEC

6561 PALMER PARK CIRCLE
SUITE D
SARASOTA, FL 34238
941.552.5657

Professional Geologist Certification

The groundwater flow modeling impact analysis included as part of this document titled "Characterization of Ground and Surface Water Resources" for the White Willow property in Lee County, Florida, was completed based on sound geologic principals and the hydrogeologic data available at the time this modeling analysis was performed. The parameters and discretization of simulated withdrawals from the aquifer system are considered to be reasonably accurate; therefore, the Professional Geologist below certifies the results of the model as they pertain to the predicted groundwater impacts. All the preceding geological analysis and interpretation(s) were evaluated and supervised by Devin Lemke, P.G., a Registered Professional Geologist pursuant to Chapter 492, Florida Statutes, (F.S.) and Chapter 61G16, Florida Administrative Code, F.A.C.



12/10/2025

Devin Lemke, P.G. No. 3270
RESPEC Company, LLC
Professional Geologist

Date

ATTACHMENT Q

Date: September 8, 2026

To: MarySue Groth, Senior Planner

From: Nic DeFilippo, Senior Environmental Planner
239.533.8983
ndefilippo@leegov.com

Subject: DCI2025-00028
Natural Resources Staff Report and Conditions for White Willow RPD
STRAP# 32-47-26-00-00001.0100, 32-47-26-00-00001.0130, 32-47-26-00-00001.0120, 32-47-26-00-00001.0110, 32-47-26-00-00001.0350

The request is to rezone 47± acres from Agricultural (AG-2) to Residential Planned Development (RPD) to allow for up to 94 single family dwelling units and accessory uses. CPA2026-00004 was transmitted to the state on August 19, 2026 by the Lee County Boad of County Commissioners. The proposed map amendments included contraction of the Southeast Lee County Special Treatment Area along Bonita Beach Road south of Kehl Canal as this area does not share the same water characteristics as the rest of Southeast Lee County. In addition, CPA2026-00004 redesignated the upland areas of the property from Density Reduction/Groundwater Resource (DR/GR) to the Sub-Outlying Suburban future land use category. This staff report is dependent upon adoption of CPA2026-00004.

The proposed development is located north of Bonita Beach Road and south of the Kehl Canal. The Kehl Canal was constructed in the early 1960s and severed hydrologic connections between the subject property and the Corkscrew Swamp Regional Ecosystem Watershed. The canal altered the historical north-to-south surface water flow paths. The applicant has indicated that the two rectangular ponds (approximately 15 acres) on the property are historic (pre-1980) limestone mining pits. The applicant's proposed stormwater management system will utilize the existing lakes for stormwater treatment and attenuation prior to discharge. The stormwater management system will need to be designed to meet South Florida Water Management District (SFWMD) and Lee County requirements prior to issuance of a local development order.

Reuse water is not available at this time to meet the irrigation needs for the potential development. The proposed development is intending to use surface water from the stormwater management lakes in the community as the primary irrigation source. The stormwater lakes will then be resupplied or offset using groundwater withdrawals from the Lower Tamiami Aquifer to meet the project's irrigation needs. In addition, the applicant outlined in the Characterization of Ground and Surface Water Resources Report (Attachment 1) that a centralized irrigation system will be utilized to ensure landscape water use efficiency and prevent over-irrigation. The applicant has estimated that two Lower Tamiami Aquifer wells will be utilized to irrigate the estimated 7.2 acres of landscaped area. The results of the 90-day no recharge model depict a maximum drawdown of 0.05 feet and occurs within the property boundaries and as a result no adverse impacts to surrounding users are anticipated. Additionally, the applicant will be required to obtain a Water Use permit from SFWMD. The proposed irrigation source is consistent with **Lee Plan Policy 61.1.6**. Staff recommends the following condition to ensure irrigations system to designed as outlined in the Characterization of Ground and Surface Water Resources Report:

> **Prior to local development order approval, the development order plans must demonstrate that irrigation will be provided via a master-controlled central irrigation system. The master-**

controlled system must be designed to comply with the Water Conservation Ordinance #24-01, as amended. The Property Owner Association documents, including Declarations and Covenants (submitted prior to Development Order approval and recorded prior to issuance of Certificate of Compliance), must prohibit the installation of single-family use wells for potable or irrigation water.

The project is southwest of Bonita Springs Utilities production wells and falls within the 5- and 10-year groundwater travel time zones. The proposed development must comply with the Lee County Wellfield Protection Ordinance prior to issuance of local development order. The Lee County Natural Resources staff reviewed the request consistent with **Lee Plan Policies 63.1.2 and 63.1.3**. To address consistency with **Lee Plan Policies 125.1.2 and 125.1.4**, the applicant has proposed a Surface Water Quality Monitoring Plan. To ensure consistency with Lee Plan policies 125.1.2, 125.1.4, and 126.1.4, staff recommends the following condition:

Prior to local development order approval, the developer must provide the Surface Water Quality Monitoring Plan, found within the attached Characterization of Ground and Surface Water Resources Report, with the following modifications:

- **Surface water quality monitoring location(s) must be finalized and identified at each proposed outfall.**

Attachments:

1. Characterization of Ground and Surface Water Resources Report (April 2026)

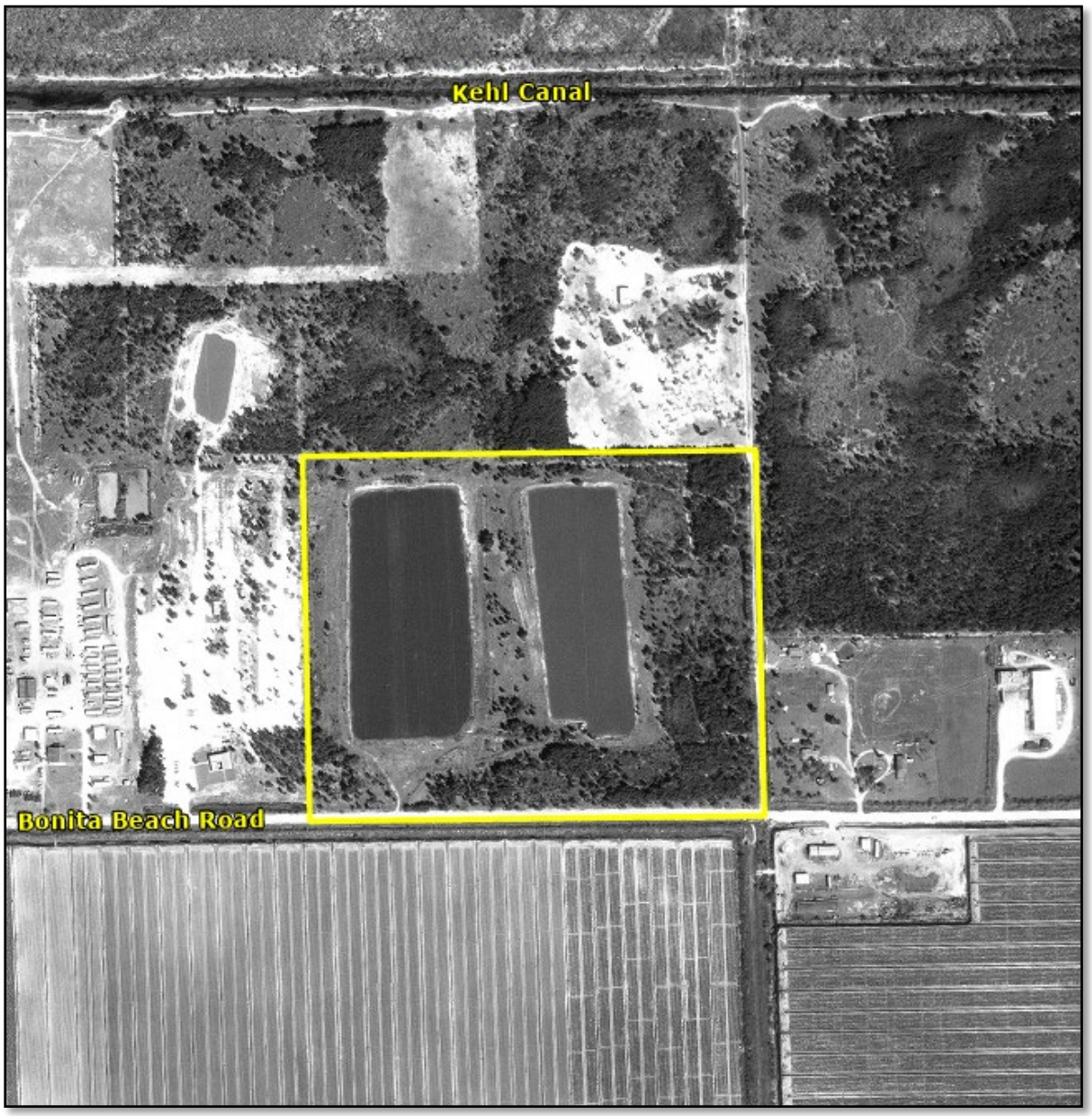
ATTACHMENT 1

CHARACTERIZATION OF GROUND AND SURFACE WATER RESOURCES

White Willow

Lee County, Florida

April 2026



1986 aerial photograph, obtained from the Florida Department of Transportation

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1.0 INTRODUCTION

The White Willow project (subject property) is located in southern Lee County, Florida, approximately 1.5 miles east of Interstate 75 and immediately north of Bonita Beach Road (County Road 865). The property comprises approximately 50 acres and is owned by Crisafulli Investment Group, LLC. It lies along the southern boundary of the County's Density Reduction / Groundwater Resource (DR/GR) Future Land Use area (**Figure 1**) and within the DR/GR's Flint Pen sub-watershed (**Figure 2**). The site is currently zoned Agricultural (AG-2), and the Applicant is requesting a Comprehensive Plan Amendment and zoning change to allow for a proposed residential development.

The subject property and surrounding lands have experienced significant disturbance beginning with the excavation of the Kehl Canal in the early 1960s. The canal, constructed to drain lands east of the Imperial River, severed hydrologic connections between the site and the Corkscrew Swamp Regional Ecosystem Watershed (CREW) and altered historical north-to-south surface water flow paths. The subject property is located approximately 1,300 feet south of the Kehl Canal and is within Water Body Identification (WBID) 3258EE, which the Florida Department of Environmental Protection (FDEP) has designated as impaired for dissolved oxygen (DO).

The property contains two (2) centrally located, rectangular historic (pre-1980) limestone mining pits totaling approximately 15 acres, or about 30 percent of the site. In addition to the excavations, legacy mining features such as disturbed land surfaces, drainage ditches, and several debris piles remain onsite and contribute to the site's altered hydrologic conditions.

As a result of these historic land uses, 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 accordance with Lee County's Comprehensive Plan (the Lee Plan), the Applicant's request is consistent with policies addressing groundwater recharge and wetland resource protection and is designed to improve existing site-specific water resource conditions. The proposed development incorporates site design and water management strategies intended to restore hydrologic functions that have been altered by prior land use activities on the subject property.

The proposed residential development advances key Lee Plan directives related to:

- Groundwater protection and recharge (consistent with Lee Plan Goals 33 and 63)
- Surface water quality improvement (consistent with Lee Plan Goals 60 and 61)
- Preservation and ecological restoration (consistent with Lee Plan Goal123)
- Reclamation and beneficial reuse of disturbed lands (consistent with Lee Plan Objective 10.1)
- Encouragement of development that enhances DR/GR environmental functions (consistent with Lee Plan Objective 33.1)

The project's stormwater management system will utilize the existing mine pits for stormwater treatment and attenuation, thereby improving water quality and providing substantial flood storage capacity. This approach is consistent with Lee Plan Goals 60 and 61 and promotes enhanced water quality and improved stormwater management. Routing treated stormwater into the limestone pits will also increase infiltration and support protection of the Surficial Aquifer, consistent with Goals 33 and 63, which emphasize groundwater recharge and resource protection within DR/GR lands. In addition, extensive nuisance and exotic vegetation removal, together with ecological restoration of disturbed areas, aligns with Goal 123, which encourage restoration and enhancement of degraded natural systems.

The development's proposed use of both stormwater and groundwater for irrigation reduces aquifer stress and supports water conservation. This aligns with Lee Plan Goal 60 (surface water management) and Goal 63 (groundwater protection). The centralized irrigation system promotes landscape water use efficiency and prevents over-irrigation, furthering water conservation and efficient water management. In addition, the proposed quarterly surface water quality monitoring and annual reporting support the Lee Plan's objectives under Goal 61 to maintain and improve surface water quality.

In summary, the project is expected to deliver the following water resource and environmental benefits:

- **Improved surface water quality and attenuation:** The engineered stormwater management system will utilize the existing limestone mining pits for treatment and attenuation, resulting in improved surface water quality and increased flood storage capacity. The storage available within the water-filled mine pits will help address historic flooding concerns while also improving water quality conditions, including increased DO.
- **Enhanced groundwater recharge and aquifer protection:** Routing treated stormwater into the historic limestone pits will promote mixing, increase infiltration, and enhance recharge to the shallow aquifer system. This approach leverages the storage capacity created by past excavation and its penetration into the underlying aquifer (see Integrated Modeling Report provided separately).
- **Restoration of degraded ecological conditions:** Due to the site's disturbed condition, significant nuisance and exotic vegetation occurs throughout the uplands and disturbed wetland areas. Removal of this vegetation will support both hydrologic and ecological restoration across the project site.
- **Conjunctive use of groundwater and stormwater for irrigation:** The development proposes to use both groundwater and captured stormwater for irrigation, with groundwater serving only as a supplement to surface water supplies stored within the project's lakes. Irrigation withdrawals will occur from these lakes, conserving groundwater withdrawals from the Lower Tamiami Aquifer and contributing to the project's overall resource benefits.
- **Master-controlled irrigation system promoting water conservation:** A master-controlled irrigation system will regulate the initiation and duration of irrigation events, increase water-

use efficiency and prevent individual homeowners from adjusting irrigation timers. Future enhancements may include integrated communication between the surface water pump station controllers and the augmentation well pump stations.

- **Enhanced Lake Management Practices and ongoing water quality monitoring:** The project includes Enhanced Lake Management Practices designed to protect water resources on site. This plan provides for quarterly surface water quality monitoring of the existing water-filled limestone pits. Monitoring results will function as an early-warning system for potential resource impacts and will be submitted after each sampling event and summarized in an annual report.

Collectively, these measures deliver a level of water resource and environmental protection that not only meets but exceeds the future land use standards envisioned in the Lee Plan.

2.0 PROPERTY SETTING

Prior to anthropogenic alterations, the southern portion of Lee County's DR/GR area, including the CREW Flint Pen Strand, was generally characterized by a complex mosaic of wet prairies, marshes, and cypress forests, interspersed with isolated, slightly elevated areas of open rangeland and Pine Flatwoods. As shown on the pre-development 1958 historical aerial photograph (**Figure 3**), the project site consisted of Hydric Flatwoods and Cypress Communities, punctuated by elongated Pine Flatwoods "islands" corresponding to slightly elevated historic marine deposits. Defined surface water flow-ways or conveyance features, common in DR/GR areas further north, were not evident on the project site. Instead, historic surface water movement appears to have occurred as dispersed sheet flow around the Flatwoods islands.

This unique historic landform in the project vicinity likely originated as relict coastal dunes deposited roughly parallel to historic shorelines. These dunes formed elongated, gently sloping sand ridges that are presently occupied by Pine Flatwoods. Due to their isolated nature, these ridges are hereafter referred to as "islands." They appear to have been superimposed on a nearly level marine terrace, which over time developed into the Hydric Flatwoods and Cypress Community wetlands characteristic of southern DR/GR lands. Post-depositional erosion and dissolution of the underlying Tamiami Formation limestone likely accentuated elevation differences between the dunes and surrounding wetlands, further defining the Flatwoods islands.

Historic surface water sheet flow was significantly altered in the early 1960s with the excavation of the Kehl Canal. As shown in **Figure 4**, the canal was constructed to extend and define the Imperial River watershed and to drain lands to the east. In combination with the extension of East Terry Street, the Kehl Canal appears to have completely cut off and isolated the subject property from the northern DR/GR lands, including the CREW. Flow records for the Kehl Canal indicate high seasonal variability. During drought conditions, the canal can exhibit virtually no flow, whereas wet season flows have been reported to reach approximately 1,500 cubic feet per second (cfs).

Average monthly flows in the Kehl Canal range from as low as 0.2 cfs during the dry season to approximately 1,300 cfs during the rainy season (CH2M HILL, July 1996). The canal not only intercepts overland surface water flows from the north but also lowers Water Table Aquifer levels in

its vicinity, further affecting the hydrology of nearby wetlands. This hydrologic isolation has contributed to the property's presently altered conditions and supports the Applicant's proposed removal of the project area from the DR/GR classification. Evidence of this alteration is apparent in 1968 aerial imagery (**Figure 4**), which shows many of the Flatwoods islands appearing drier, with exposed, light-colored soil boundaries likely caused by desiccated soils.

Prior to 1980, the project site was cleared of vegetation for limestone mining, resulting in the creation of two rectangular pits. Upon cessation of mining, approximately 15 acres (30 percent) of the site became water-filled mining pits. Additional mining-related disturbances, including areas stripped of overburden, debris piles, and drainage ditches, have further altered the property. The post-mining topography is clearly evident in the LiDAR imagery provided as **Figure 5**. Current land surface elevations are variable due to mining but generally range from 12 to 13 feet North American Vertical Datum (NAVD).

The predominant soil type within the project area is Pompano Fine Sand, as identified by the Natural Resources Conservation Service (NRCS). Soils of the Pompano series are very poorly drained and developed from thick, nearly level sandy marine sediments. The Pine Flatwoods "islands" are underlain by Immokalee Sands, which are poorly drained soils also formed from sandy marine sediments. The NRCS soils map is shown in **Figure 6**. According to the Federal Emergency Management Agency's (FEMA) National Flood Hazard Map, the property lies within Flood Zone X, an area of minimal to moderate flood risk.

The project site is located within the State of Florida's WBID No. 3258E (Imperial River). A WBID represents a sub-watershed delineated by the FDEP based on U.S. Geological Survey (USGS) Hydrologic Unit Codes (HUCs). Surface water quality evaluations within WBID No. 3258E have verified the watershed as impaired for DO, with an established total maximum daily load (TMDL) for this constituent. Low DO in surface waters is often caused by nutrient enrichment but can also occur naturally in slow-moving, tannin-stained waters with deposits of decaying vegetation, such as swamps and sloughs. The project area's highly disturbed condition and water-filled mining pits may contribute to low DO levels. Implementation of the proposed development is expected to improve site conditions by restoring hydrologic connectivity among surface water basins and increasing mixing through the engineered stormwater management system.

3.0 HYDROGEOLOGY

Three (3) principal aquifer systems underlie the project site:

- Unconfined Surficial Aquifer System (also known as the Water Table Aquifer)
- Confined Intermediate Aquifer System
- Confined Upper Floridan Aquifer System

In southern Lee County, groundwater quality generally decreases with depth. Suitable sources for irrigation and potable water are typically located at depths less than 300 feet, while deeper units tend to be highly mineralized and saline. As a result, groundwater withdrawals are primarily focused on the shallow Surficial Aquifer System (Water Table Aquifer) and the semi-confined Lower Tamiami

Aquifer. Beneath the Lower Tamiami, a relatively fresh, confined producing zone known as the Sandstone Aquifer also exists. These shallower aquifer systems are further described below.

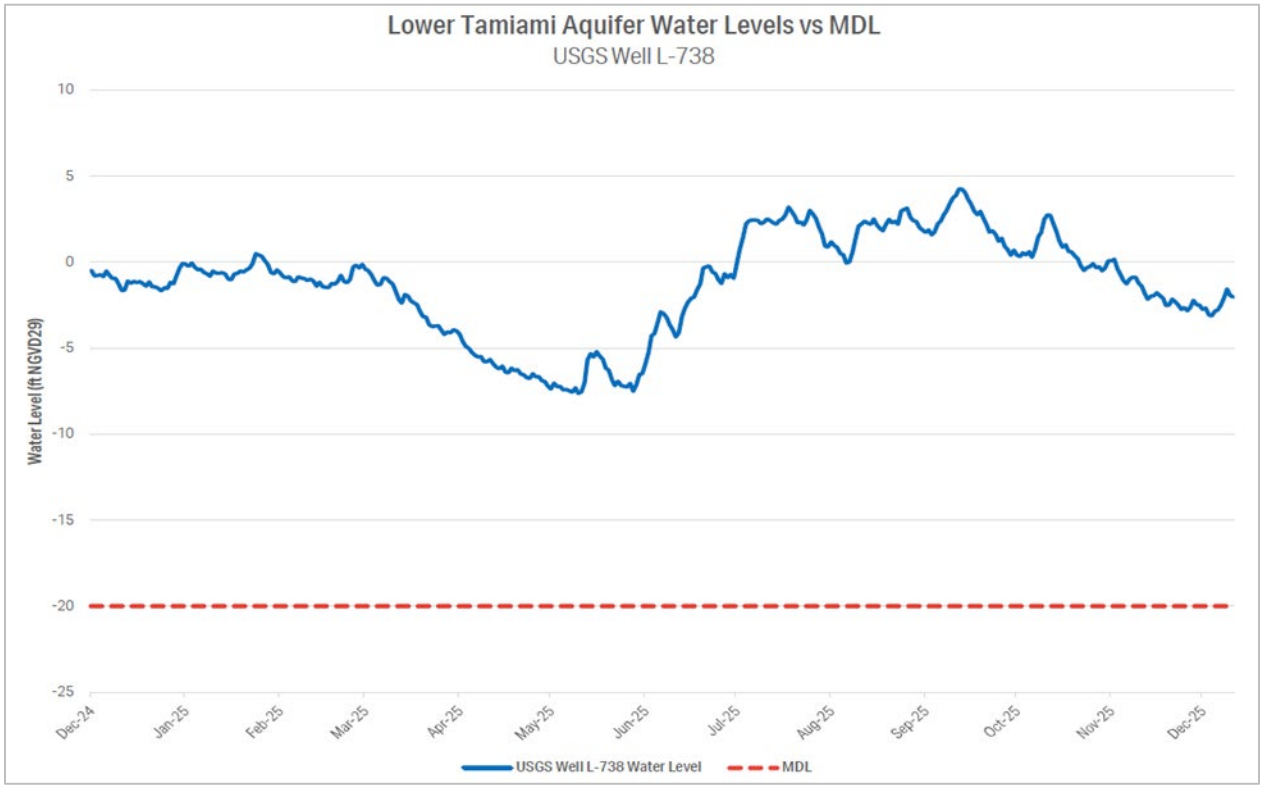
3.1 UNCONFINED WATER TABLE AQUIFER

The unconfined Water Table Aquifer originates at land surface and consists of 8 to 10 feet of unconsolidated surficial deposits of fine-grained, silty quartz sand with minor shell content. Thin, discontinuous clayey sands may overlay the uneven limestone of the upper Tamiami Formation, which includes the Ochopee and Buckingham Limestone Members and the Pinecrest Sand Member (FGS Special Publication No. 49). Water quality is fresh in areas not affected by saline intrusion, with dissolved chloride concentrations ranging from 10 to 70 milligrams per liter (mg/L). The Water Table Aquifer is highly productive. Onsite limestone mining excavated portions of the upper Tamiami Formation.

3.2 LOWER TAMIAMI AQUIFER

Beneath the upper Tamiami Formation, there are semi-confining clays and low-permeability sediments, known as the Bonita Springs Marl, which overlie the Lower Tamiami Aquifer. This aquifer is distinct from the overlying limestone and is highly productive. Water quality varies with proximity to tidally influenced water bodies, with dissolved chloride concentrations ranging from approximately 40 to 100 mg/L in non-saline areas. The Bonita Springs Marl reduces the potential for withdrawals from the Lower Tamiami Aquifer to induce drawdown in the overlying Water Table Aquifer and prevents adverse impacts to wetlands. The project's proposed irrigation system will utilize two (2) Lower Tamiami Aquifer augmentation wells to supplement surface water supplies from the stormwater management lakes - historic mining pits. It must be noted that Bonita Springs Utilities (BSU) operates a potable wellfield (Eastern Wellfield) that utilizes the Lower Tamiami Aquifer under SFWMD Water Use Permit No. 36-00008-W. To protect potable water supplies, Lee County has instituted wellfield protection zones (Lee Plan Map 4-C). As shown on **Figure 7**, due to the proximity of City of Bonita Springs wellfield, the Lee Plan 5- and 10-year travel time protection zones extend onto the subject property. No adverse drawdown or water quality impacts are anticipated to occur to City of Bonita Springs wellfield as a result of the proposed development.

Groundwater level data from the USGS Lower Tamiami Aquifer monitoring well No. L-738, located approximately 3 miles west of the subject property, indicate that long-term groundwater elevations have consistently remained above the established Maximum Developable Limit (MDL). These conditions demonstrate that groundwater resources in the vicinity of the site are being adequately maintained and that no groundwater quantity or water resource constraints are anticipated that would adversely affect the proposed development. A recent hydrograph for monitoring well No. L-738 is provided below. The location for monitoring well L-738 is shown in **Figure 1**.



3.3 SANDSTONE AQUIFER

The Sandstone Aquifer occurs within the Intermediate Aquifer System and lies below the Tamiami Formation and is separated from overlying aquifers by low-permeability clayey sediments. Depth to the top of this aquifer ranges from approximately 150 to 200 feet below land surface (bls), with thickness varying from 30 to 50 feet near the project site. It is composed of sandy limestone, sandstone, sandy dolomite, and calcareous sands, and is associated with the Peace River Formation of the Hawthorn Group (FGS Circular No. 103, 1986). Dissolved chloride concentrations generally range from 40 to 200 mg/L. Due to the occurrence of low-permeability sediments separating the Sandstone Aquifer from the overlying Water Table Aquifer, the potential for groundwater withdrawals from the Sandstone Aquifer to cause adverse drawdown in the Water Table Aquifer is considered remote.

3.4 EXISTING RECHARGE TO UNDERLYING AQUIFERS

The USGS estimates recharge at the site ranges from 0 to 3 inches per year (USGS/SFWMD, 1995). Due to the highly disturbed condition of the site, effective recharge to the Water Table Aquifer (and underlying Lower Tamiami Aquifer) is likely limited.

3.5 CONSISTENCY WITH LEE PLAN POLICIES 2.3.1 AND 2.3.2

The proposed Comprehensive Plan Amendment is consistent with Lee Plan Policies 2.3.1 and 2.3.2, which require that amendments in areas important for groundwater protection, including areas within the DR/GR area to demonstrate that the development will not adversely affect groundwater availability, recharge functions, or potable supply resources.

3.5.1 POLICY 2.3.1 – PROTECTION OF POTABLE WATER SOURCES

The SFWMD 2022 Lower West Coast Water Supply Plan Update identifies the Lower Tamiami Aquifer as a traditional freshwater resource that is incorporated into long-range planning for Lee County and the DR/GR. 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.

3.5.2 GROUNDWATER RESOURCE PROTECTION AND IMPACT EVALUATION

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.

The project will also incorporate efficient water use practices, including a master-controlled irrigation system whereby no individual homeowner can initiate or prolong irrigation cycles, and the conjunctive use of surface water (detained stormwater) for irrigation, thereby minimizing groundwater withdrawals and ensuring protection of DR/GR recharge functions. Therefore, the proposed withdrawals are consistent with Policy 2.3.2.

The Lower Tamiami Aquifer's favorable hydrogeologic characteristics, its planned use in regional water-supply strategies, and the modest irrigation demand associated with the proposed development collectively demonstrate that the project's groundwater use is sustainable, low-impact, and fully compatible with the protective intent of Lee Plan Policies 2.3.1 and 2.3.2, including the County's goals for safeguarding the DR/GR groundwater resource area.

4.0 PROPOSED IRRIGATION DEMANDS AND SOURCES

A review of existing reclaimed water pipelines indicates that none are located in proximity to the subject property. Therefore, all irrigation supplies must be derived onsite. As shown on the Applicant's Concept Plan provided as **Figure 8**, stormwater will be treated within the reconfigured limestone mining water-filled pits. These surface water bodies afford an opportunity for stormwater capture and reuse for irrigation. However, during prolonged droughts, surface water supplies for irrigation are anticipated to be limited. Therefore, supplies are proposed to be augmented by the use of groundwater from the Lower Tamiami Aquifer. It is estimated that two (2) Lower Tamiami Aquifer wells will be required to irrigate an estimated landscaped area of approximately of 7.2 acres.

Using the SFWMD Blaney-Criddle irrigation allocation calculator, a preliminary estimate of the development's irrigation demand is approximately 25,974 gallons per day (gpd), with a peak dry season (maximum month) demand of approximately 1.18 million gallons. Considering the combined surface areas of the stormwater lakes and reconfigured mine pits portrayed in the conceptual development layout (**Figure 8**), the estimated daily irrigation demand of 25,974 gallons would only lower the combined surface water bodies by less than an inch each day. The SFWMD Blaney-Criddle irrigation documentation s provided as **Attachment A**.

The proposed conjunctive use of both ground and surface water supplies is anticipated to conserve groundwater resources proposed to be derived from the Lower Tamiami Aquifer when adequate surface water supplies are readily available, thereby furthering the project's resource benefits. In addition, the project proposes a master-controlled irrigation system that will regulate both the initiation and overall duration of irrigation events in order to increase irrigation water use efficiency and enhance water conservation (i.e., no individual homeowner will have access to irrigation timers).

5.0 GROUNDWATER FLOW MODELING

To demonstrate that the proposed use of the Lower Tamiami Aquifer for supplemental irrigation will not cause adverse impacts to surrounding existing legal users, a single-layer groundwater flow model was developed using capabilities of AquiferWin32 to evaluate potential drawdown impacts resulting from the proposed maximum monthly withdrawals. The analytical groundwater modeling scenario includes one stress period that represents transient / future or proposed conditions and was run for 90-days with no recharge to simulate the maximum monthly allocation for the three driest months of the year (March, April, and May). The Hantush and Jacob, 1955 (Leaky Aquifer) solution was utilized in this modeling scenario.

The results of the 90-day maximum monthly modeling scenario are shown for the Lower Tamiami Aquifer in **Figure 9**. The greatest drawdown predicted to occur as a result of the requested maximum month quantity is approximately 0.05 feet and occurs within the property boundary at the proposed well nodes. Per Section 3.1.2 of the SFWMD's Applicant Handbook, modeling analyses must include proposed wells, as well as any other permitted groundwater withdrawals within the "cone of depression" of proposed use. SFWMD defines the "cone of depression" of the proposed use as the 1.0-foot drawdown contour for confined aquifer systems. However, as shown in **Figure 9**, no drawdown greater than 1.0 foot is predicted as a result of the maximum monthly groundwater model. Therefore, the potential for harm to occur to existing legal users as a result of the requested allocation is considered to be de minimis and not adverse and a cumulative impact assessment was not performed.

A statement from a Professional Geologist certifying the results of these groundwater flow modeling scenarios is provided herein as **Attachment B**, and the required modeling files will be provided to District staff under a separate cover.

6.0 BONITA SPRINGS EASTERN WELLFIELD PROTECTION

The Bonita Springs Eastern Wellfield is a critical public water supply facility serving southern Lee County and the City of Bonita Springs. The proposed residential development is located within the

5- and 10-year groundwater travel time zones for the wellfield and has been evaluated for consistency with the Lee County Comprehensive Plan (Lee Plan) and the Lee County Land Development Code (LDC) wellfield protection standards applicable to public water supply facilities.

The proposed residential use is a permitted and compatible land use within the designated travel time zones and complies with Lee County's Wellfield Protection Ordinance and LDC provisions regulating development within wellfield protection areas. The development avoids prohibited or restricted land uses identified in the LDC that could pose an unreasonable risk to groundwater quality or the operation of public water supply wells. No industrial uses, bulk fuel storage, hazardous waste facilities, chemical manufacturing, or other high-risk activities regulated or prohibited by the LDC are proposed.

In accordance with the Lee Plan and applicable LDC utility requirements, the development will be served by centralized potable water and centralized sanitary sewer service. The use of central sewer eliminates on-site wastewater treatment systems and septic tanks, thereby reducing the potential for nutrient loading, pathogens, or other contaminants to enter the groundwater within the wellfield travel time zones, consistent with LDC wellfield protection objectives.

Hazardous material use and storage within the development will be limited to normal residential household quantities, consistent with LDC restrictions applicable within wellfield protection areas. No above-ground or underground fuel storage tanks, vehicle maintenance facilities, or bulk chemical storage are proposed. Any temporary construction-related fueling, equipment servicing, or material storage will comply with LDC spill prevention, secondary containment, and cleanup requirements to protect groundwater quality.

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.

During site clearing, grading, and construction activities, erosion control, sediment management, and spill prevention best management practices required by the LDC will be implemented to prevent contaminants from entering surface waters or the groundwater system. Landscaping and site maintenance will comply with LDC landscaping standards and Lee County fertilizer regulations, with an emphasis on native or low-input plant species to reduce irrigation and fertilizer demands and minimize nutrient loading to groundwater.

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.

Through compliance with the Lee Plan and the LDC wellfield protection standards, the proposed residential development ensures that land use within the 5- and 10-year travel time zones of the Bonita Springs Eastern Wellfield protects public drinking water supplies, minimizes contamination risk, and supports long-term potable water sustainability.

7.0 ENHANCED LAKE MANAGEMENT PRACTICES

In order to protect water resources, the following management practices are proposed for the development's stormwater lakes. It is important to note that, as the development evolves, the Best Management Practices (BMPs) proposed to protect water resources must also evolve. The following management actions provide a framework of ground and surface water protection measures that will not only safeguard but help to sustain water resource conditions. Please note that no motorized boats will be allowed on any of the project's stormwater management lakes.

Through adherence to these BMPs, the project will maintain stormwater and groundwater quality, comply with Lee County LDC and Wellfield Protection Ordinance standards, and ensure long-term protection of water resources in accordance with the Lee Comprehensive Plan. The Developer's designated maintenance entity (Community Development District [CDD] or Homeowners Associaton) will be responsible in perpetuity for the operation and maintenance of all stormwater management facilities, including regular inspection, maintenance, and surface water quality monitoring.

7.1 WATER RESOURCES BEST MANAGEMENT PRACTICES

As the project progresses from predominately a "construction phase" to "partial construction" and then ultimately to a "post-construction" phase, the BMPs must change to sustain the water resource protection measures. Construction of the proposed stormwater management system will occur relatively quickly. However, it is important that proper management practices be maintained to safeguard the water resources through the long-term operational phase.

7.1.1 CONSTRUCTION PHASE BMPS

All construction activities will comply with Lee County Wellfield Protection Ordinance No. 07-35, in accordance with Section 14-214 for Protection Zone No. 1 and Section 14-208 requirements for handling, storage, and use of regulated substances. The general contractor will ensure that all contractors and subcontractors evaluate site conditions prior to starting work to minimize risks to water resources and that any regulated substances are stored and handled in a manner that prevents accidental releases.

Contractors will maintain spill containment and cleanup equipment onsite and will be familiar with manufacturer safety data sheets and procedures for handling accidental releases. Any spill of a regulated substance will be reported immediately to the Developer, who will notify the Lee County Division of Natural Resources and the FDEP.

7.1.2 POST-CONSTRUCTION PHASE BMPS

Upon completion of construction, all remaining regulated substances and containment systems will be removed from the site. Turbidity control, erosion management, and stormwater protection measures consistent with SFWMD, FDEP National Pollutant Discharge Elimination System (NPDES) permits, and Florida Stormwater Sedimentation Control standards will be implemented throughout construction until vegetation or other stabilization measures are established.

After the issuance of the Lee County Certificate of Compliance or SFWMD Stormwater Management System Certification, the project will transition to the post-construction phase, with the primary focus being the maintenance of the stormwater management lakes and associated conveyance and control structures.

7.2 LAKE MAINTENANCE

Proper maintenance of stormwater wet detention areas is essential in Florida to ensure long-term water quality protection and flood control. These systems are designed to capture and treat runoff by allowing suspended solids, nutrients, and other pollutants to settle before the water is discharged downstream. Without regular upkeep, such as managing vegetation, removing accumulated sediment, and maintaining control structures, detention ponds can lose storage capacity and treatment efficiency, leading to degraded water quality and increased flood risk. Routine maintenance of these areas helps preserve the ecological function of these systems and supports compliance with state and local water management regulations.

7.2.1 NUISANCE AND EXOTIC VEGETATION CONTROL

The controlling entity will be responsible for the removal (in perpetuity) of all nuisance and exotic vegetation from the stormwater management system as defined by the Lee County LDC.

The stormwater lakes must be inspected annually, and any prohibited vegetation must be removed by the use of hand-clearing or appropriate chemical treatment. Only aquatic-approved compounds may be utilized in the stormwater management system lake. Herbicides and/or algaecides may only be applied by a licensed professional applicator who meets the requirements of Lee County, and in accordance with manufacturer specifications. All applicable local, state and/or federal guidelines and requirements will also be followed.

7.2.2 LITTORAL VEGETATION PRESERVATION

Littoral zone vegetation is required to be installed and maintained. The littoral zone provides habitat for wading birds, fish and aquatic invertebrates. Littoral vegetation also helps stabilize the lake shoreline and helps prevent erosion.

Littoral plants that die will be replaced in accordance with Lee County LDC requirements. The presence of littoral plants in the lake is desirable and may also help to improve the water quality. The spread of littoral plants will be encouraged throughout the designated littoral areas. Mechanical trimming, mowing or the use of land-based herbicides on desirable littoral plants is prohibited. Any trimming or removal of vegetation required to promote the survival and viability of littoral vegetation will be performed by hand or by approved aquatic herbicides and methods.

7.2.3 FERTILIZER APPLICATION

Strict adherence will be maintained with Lee County's Fertilizer Ordinance No. 08-08. Any person(s) applying fertilizers must have received a limited certification in compliance with Florida Statute (F.S.) 482.1562 prior to application of any and all fertilizers.

All professional landscape businesses must register with Lee County prior to performing landscape fertilization services within unincorporated Lee County. At least one (1) employee of a firm employed to perform landscape fertilization services must be a Certified Professional Landscaper. Proof of completion of a Lee County-approved BMP training program must be provided to the Division of Lee County Natural Resources. At least one (1) BMP-trained employee must be present onsite while fertilizers are applied. A registration decal provided by the division must be displayed on all company vehicles.

7.3 EROSION PROTECTION AND LAKE BANK MAINTENANCE

Lake banks are generally susceptible to erosion due to overland flow of stormwater runoff, wave action, and the natural seasonal fluctuation of water levels. Accordingly, lake banks are designed to minimize this potential for erosion.

Lake banks will be inspected annually to identify areas of erosion. Once identified, the erosion will be repaired and the source of erosion shall be eliminated, if possible. Where excessive erosion occurs, repair of the lake banks and/or enhancement of stabilization measures may be necessary.

7.4 PESTICIDE, HERBICIDE AND/OR FUNGICIDE APPLICATIONS

All applications of pesticides, herbicides, algaecides and/or fungicides shall be applied by a licensed professional applicator, meet the requirements of Lee County, be applied in accordance with the manufacturer's specifications, and shall meet all applicable local, state and/or federal guidelines and requirements. Only approved aquatic herbicides may be used to treat the stormwater management system. The following BMPs are part of an Integrated Pest, Disease, and Herbicide Program.

The application of pesticides, herbicides and/or fungicides will only be performed by certified contractors. The use of any chemical product in a manner that will allow airborne or waterborne entry of such products into the surface water management system is prohibited. This requirement shall not apply to the chemical agents used by certified lake management specialists for the control of algae and nuisance vegetation within the stormwater management system lakes. However, application of such agents shall be in compliance with the requirements of Lee County, applied in accordance with the manufacturer's specifications, and meet all applicable local, state and/or federal guidelines and requirements. Pesticides, fungicides, and herbicides will be used only in response to a specific problem and in the manner and amount recommended by the manufacturer. Broad application of pesticides, fungicides and herbicides as a preventative measure is strongly discouraged.

8.0 SURFACE WATER QUALITY MONITORING

8.1 GENERAL DATA QUALITY OBJECTIVES

All surface water quality samples will be collected in accordance with Chapter 62-160, Florida Administrative Code (F.A.C.), and the FDEP's Standard Operating Procedures (SOPs) DEP-SOP-001/01 FQ 100 Field Quality Control Requirements. Surface water quality sampling will be performed four (4) times per year (March, June, September, and December).

The purpose of the surface water monitoring program is to assure stormwater discharges from the subject property meet all applicable requirements of Chapter 62-302, F.A.C., Surface Water Quality Standards, before discharging surface water from the stormwater management system.

Additionally, monitoring will verify the efficacy of the BMP's described above. Please note that if there is no flow observed from the outfalls at the time of sample collection, the "no -flow" condition will be noted, and no surface water sample will be taken. If flow has occurred in the last 30 days, a sample shall be collected just upstream of the control structure to represent the discharged water.

8.2 SURFACE WATER QUALITY MONITORING

As shown in **Figure 10**, baseline water quality samples will be collected from both lakes. As shown in **Figure 10**, sampling location SW-1 is adjacent to the property outfall. Both locations will then be sampled four times per year (March, June, September, and December). Surface water quality grab samples will be collected per FDEP SOP protocol and analyzed by a National Environmental Laboratories Accreditation Conference (NELAC/TNI)-certified laboratory. The surface water quality parameters to be tested, as well as the laboratory's Accuracy, Precision, and Minimum Method Detection Limit (MDL), are summarized in **Table 1**. Please note that the Practical Quantitation Limit (PQL) for each parameter varies between laboratories; however, the PQL typically equates to four times the MDL.

Field Parameters – Depth of Water, DO, pH, Temperature, Specific Conductance, and Turbidity

Lab Parameters –Ammonia, Biological Oxygen Demand, Chloride, Copper, Iron, Nitrate + Nitrite, Total Nitrogen, Total Phosphorus, and Zinc

Quarterly surface water quality monitoring shall be continued for a minimum of five (5) years after operational completion of the stormwater management system. After five (5) consecutive years of testing, a request for modification in the monitoring requirements may be proposed to the Lee County Natural Resources Department if it can be demonstrated that surface water quality is being maintained within applicable State standards. All surface water quality data will be supplied to Lee County as described below.

8.3 WATER QUALITY DATA REPORTING AND ANALYSIS

Surface water quality data will be submitted to Lee County Natural Resources Department staff in an approved electronic format within 30 days of receiving the water quality results from the contract laboratory. The submittal will include all field notes and field and laboratory water quality results, as well as all previously collected water quality data (i.e. the period of record). The submittals will also

include a brief narrative on the most recent sample collection, sample chain of custody, descriptions of any re-testing of erroneous values, and any water quality exceedances. Water levels will be provided in tabular and graphical forms.

By March 1 of each year, a Water Resource Summary Report for the preceding calendar year shall be supplied to Lee County Natural Resources staff that summarizes the surface and groundwater monitoring results for the development. The results will include a summary table that lists all the field and laboratory parameters for surface water, consistent with requirements of F.A.C. 62-160. Laboratory parameter concentrations that fall below the PQL for that parameter will be reported with no value; however, a value qualifier of "I" (between the MDL and PQL) or "U" (below the MDL) will be included in the summary table.

All water quality data for the analytes listed in **Table 1** that are detected in concentrations above the laboratory PQL will be reviewed, graphed and statistically analyzed for trends and exceedances above two (2) standard deviations of the mean of all values above the MDL. Any reported concentrations above the MDL will be clearly identified as well as remedial actions that were used to timely reduce that particular analyte's concentration.

8.4 REMEDIAL ACTIONS

In the event of significant surface water impact from hydrocarbon spills, pesticide or herbicide applications, or other releases, the Developer or their successor will notify the Lee County Natural Resources Division within 12 hours (or the next business day) and FDEP Office of Emergency Response within 24 hours if there is an immediate threat to human health or the environment. The Developer or their successor will coordinate assessment and remediation with Lee County and comply with all local, state, and federal permitting requirements, including installation of temporary monitoring wells or more comprehensive investigations if needed.

9.0 EXISTING ONSITE WELLS

According to Lee County's Permitted Well database, four of the five parcels within the subject property are shown to contain a single well located near the parcel centroid and classified for "Single Family" use. Two of these reported wells are mapped within existing water-filled pits, and two are mapped on upland portions of the site. Review of the associated well construction permits and available records indicates that these features represent shallow geotechnical or hydrogeologic test borings rather than active or production water supply wells. The borings appear to have been installed for site investigation purposes, are not equipped with permanent pumping infrastructure, and are not utilized for potable or irrigation supply. As such, these test borings are not expected to adversely affect groundwater resources, interfere with proposed site development, or require abandonment or protection measures beyond standard construction practices.

10.0 CONCLUSIONS

The White Willow project presents a unique opportunity to restore and enhance a highly disturbed and hydrologically impacted property. As detailed above, the proposed development demonstrates

a high level of protection, preservation, and enhancement of groundwater, surface water, and environmental resources. The project is fully consistent with the Lee Plan, including Goal 63, which protects potable water sources and safeguards wellfield areas; and Goals 60 and 61, which preserve natural drainage systems and ensure stormwater management and water quality standards are met.

Additionally, the project complies with applicable Lee County LDC requirements, including Sections 14-208 and 14-214 governing Wellfield Protection Zones, as well as stormwater, erosion control, and lake management provisions. By incorporating these measures, the White Willow development not only supports compatible residential land use but also provides measurable improvements to site-specific hydrologic and ecological conditions, ensuring long-term protection and enhancement of critical water resources in southern Lee County.

Table 1 - Surface Water Quality Analytes and Proposed Schedule for Sampling

Field Parameters					
Parameter	Units	Precision (%RPD)	Accuracy (%Recovery)	MDL	Sampling Frequency
Depth of Water	Feet	0.01	NA	NA	Quarterly
Dissolved Oxygen	mg/L	FT 1000-1	FT 1000-1	NA	Quarterly
pH	SU	FT 1000-1	FT 1000-1	NA	Quarterly
Specific Conductance	µS/cm	FT 1000-1	FT 1000-1	NA	Quarterly
Temperature	Deg C	FT 1000-1	FT 1000-1	NA	Quarterly
Turbidity	NTU	FT 1000-1	FT 1000-1	NA	Quarterly
Laboratory Parameters					
Ammonia	mg/L	*17	90-110	0.008	Quarterly
Biological Oxygen Demand	mg/L	*28	84.6-115	1	Quarterly
Chloride	mg/L	*5	90-110	0.353	Quarterly
Copper	ug/L	*10	70-130	0.346	Quarterly
Hardness	mg/L	CALC	CALC	0.682	Quarterly
Iron	mg/L	*10	70-130	29	Quarterly
Lead	ug/L	*10	70-130	0.67	Quarterly
Nitrate + Nitrite	mg/L	*5	90-110	0.004	Quarterly
Total Nitrogen	mg/L	CALC	CALC	CALC	Quarterly
Total Phosphorus	mg/L	*10	90-110	0.008	Quarterly
Zinc	mg/L	*10	70-130	0.0014	Quarterly

*Value represents percent (%) relative standard deviation (RSD).

**All values within the table above were supplied by Benchmark Enviroanalytical Laboratory and are specific to the water quality laboratory that performs the analyses.

Figures

RESPEC

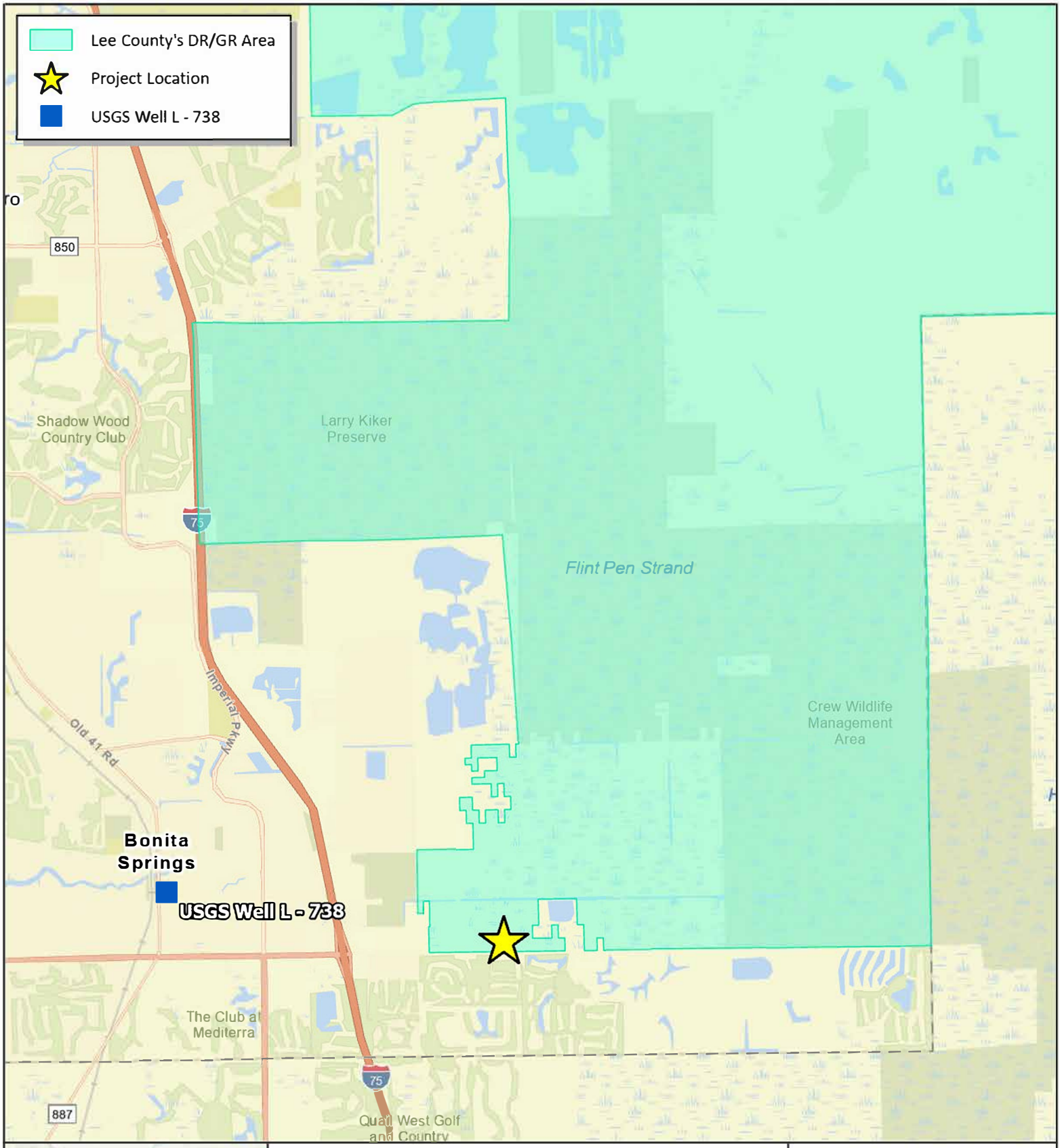




Figure 1
Density Reduction/Groundwater Resource Area
White Willow
Lee County, Florida

N

0 0.5 1 1.5 Mi

Scale: 1:80,000

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12/9/2025

Image: Esri, Lee County

RESPEC

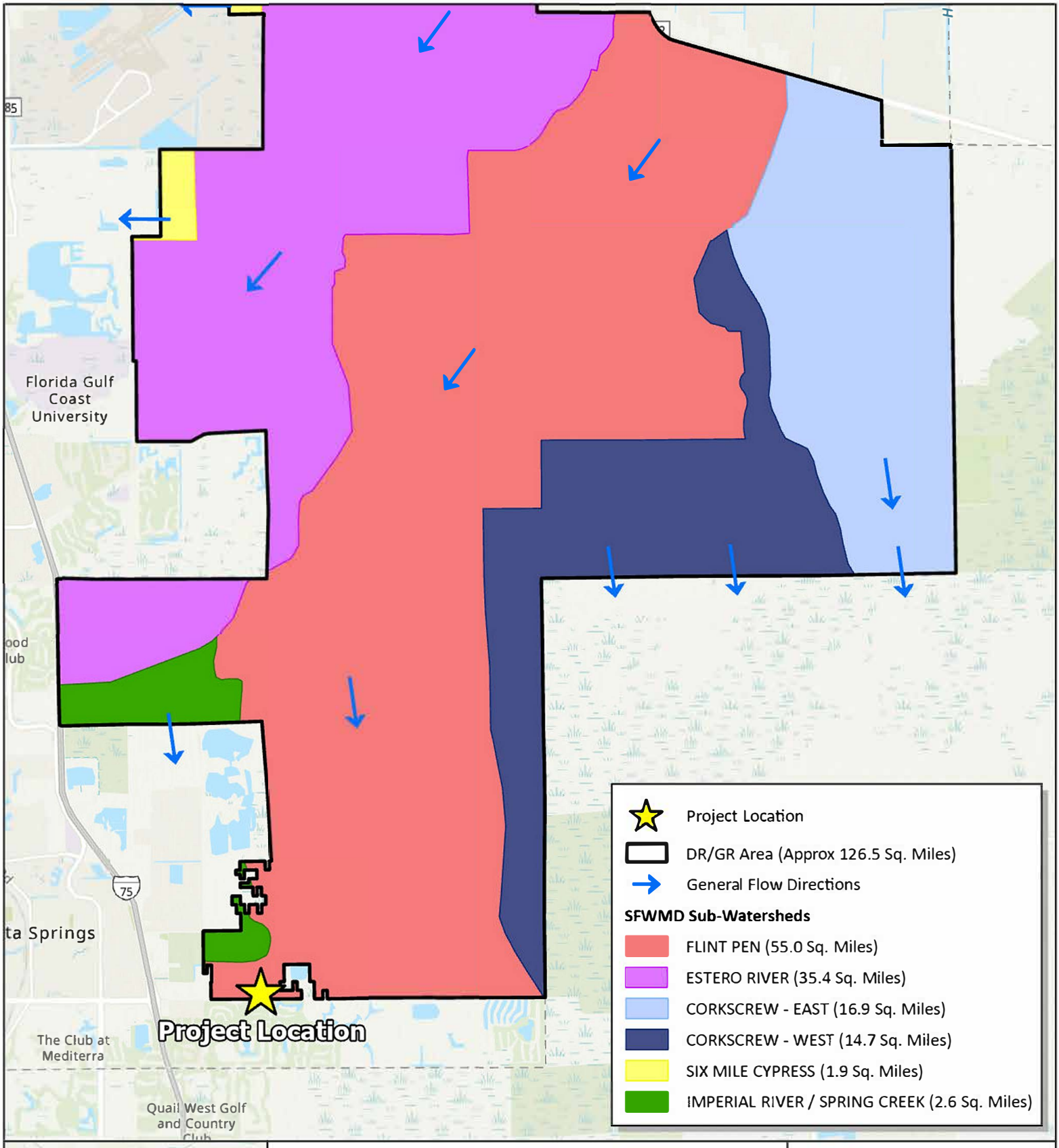




Figure 2
DR/GR Sub-Watersheds
White Willow
Lee County, Florida

N

0 1 2 Miles

Scale: 1:120,000

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Image: Esri

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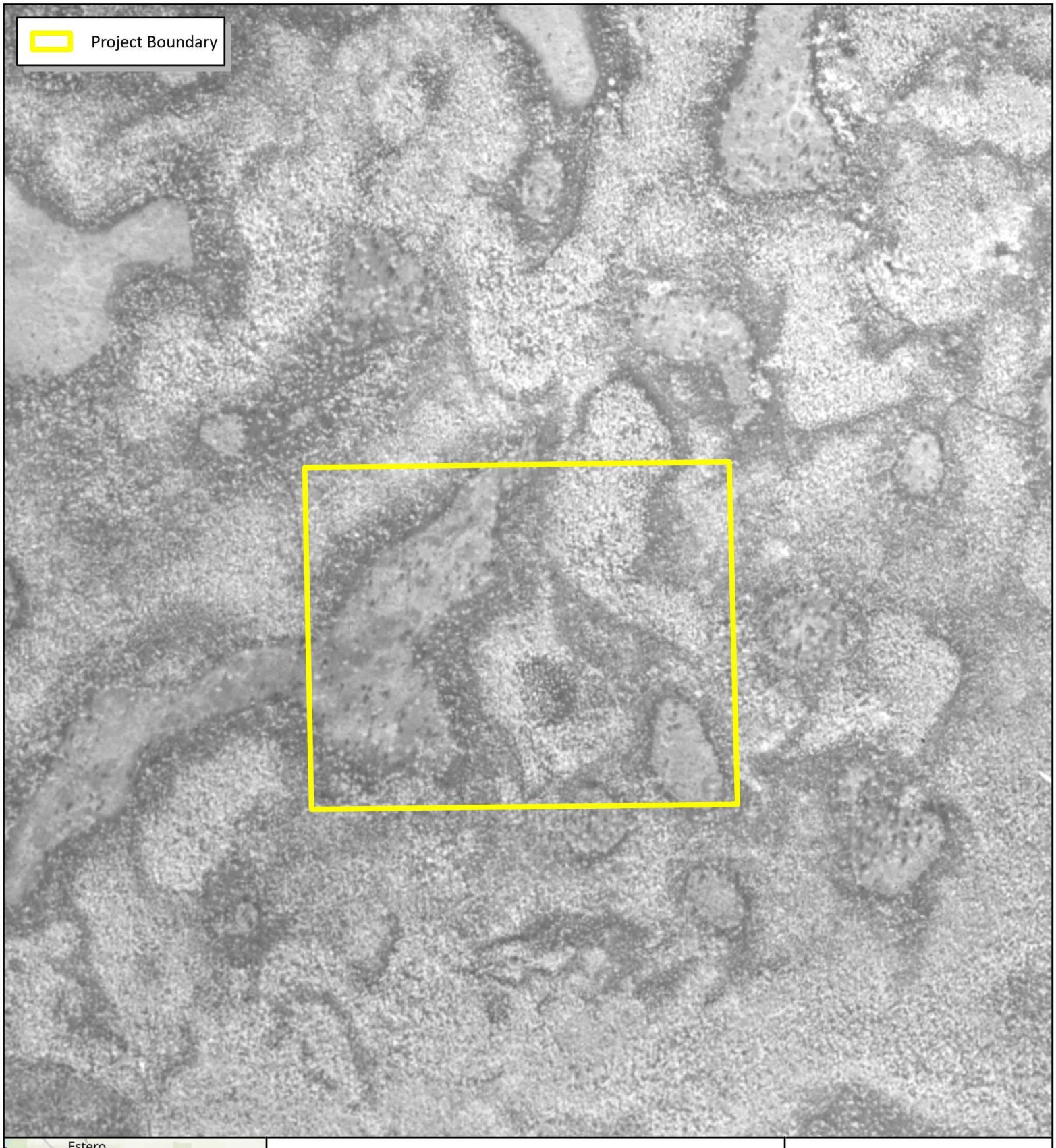




Figure 3
1958 Historic Aerial Imagery
White Willow
Lee County, Florida

N

0 500 US Feet

Scale: 1:6,000

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12/12/2025

Image: Esri, UFDC

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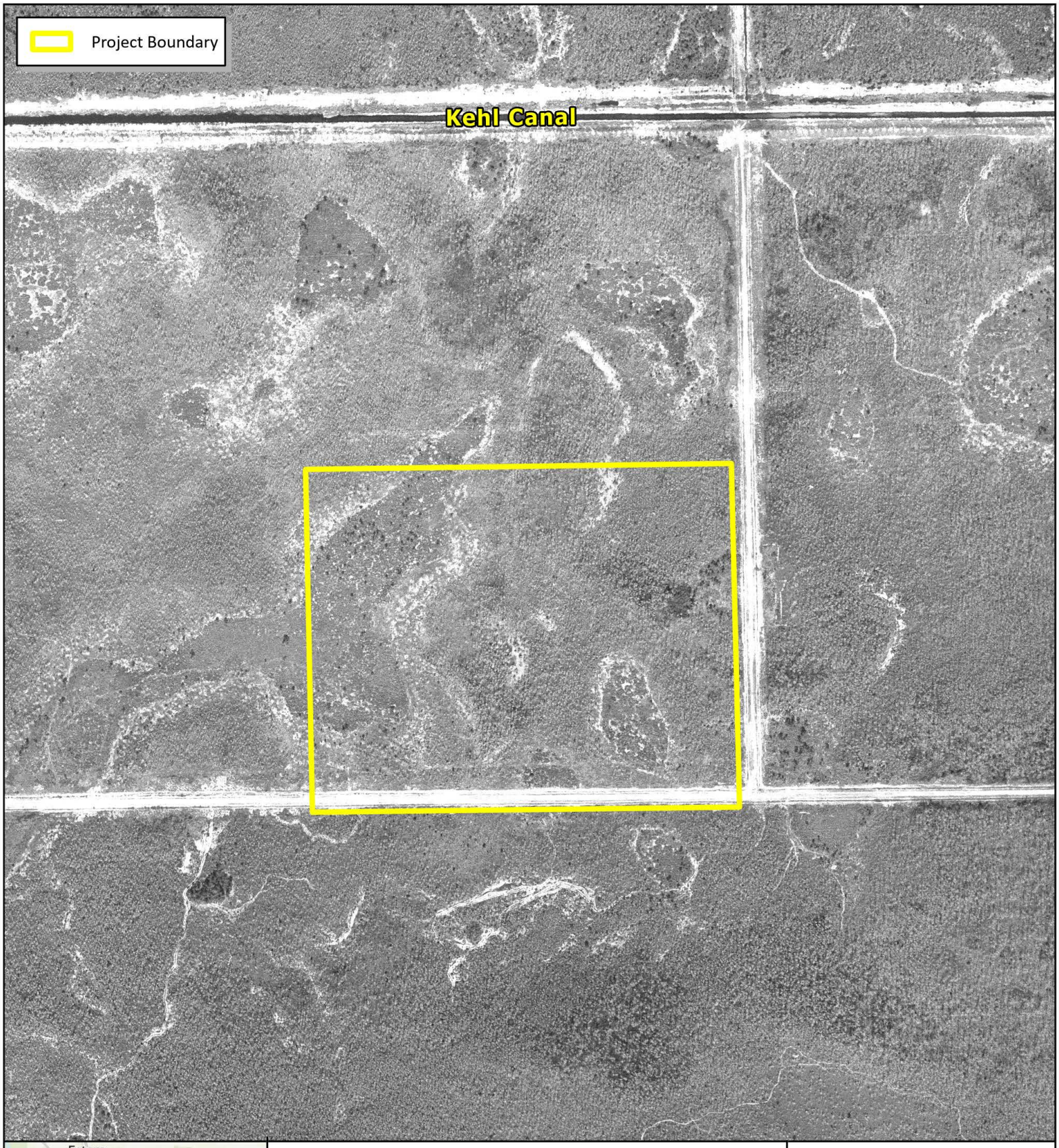




Figure 4
1968 Historic Aerial Imagery
White Willow
Lee County, Florida

N

0 500 US Feet

Scale: 1:6,000

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12/12/2025

Image: Esri, FDOT

RESPEC

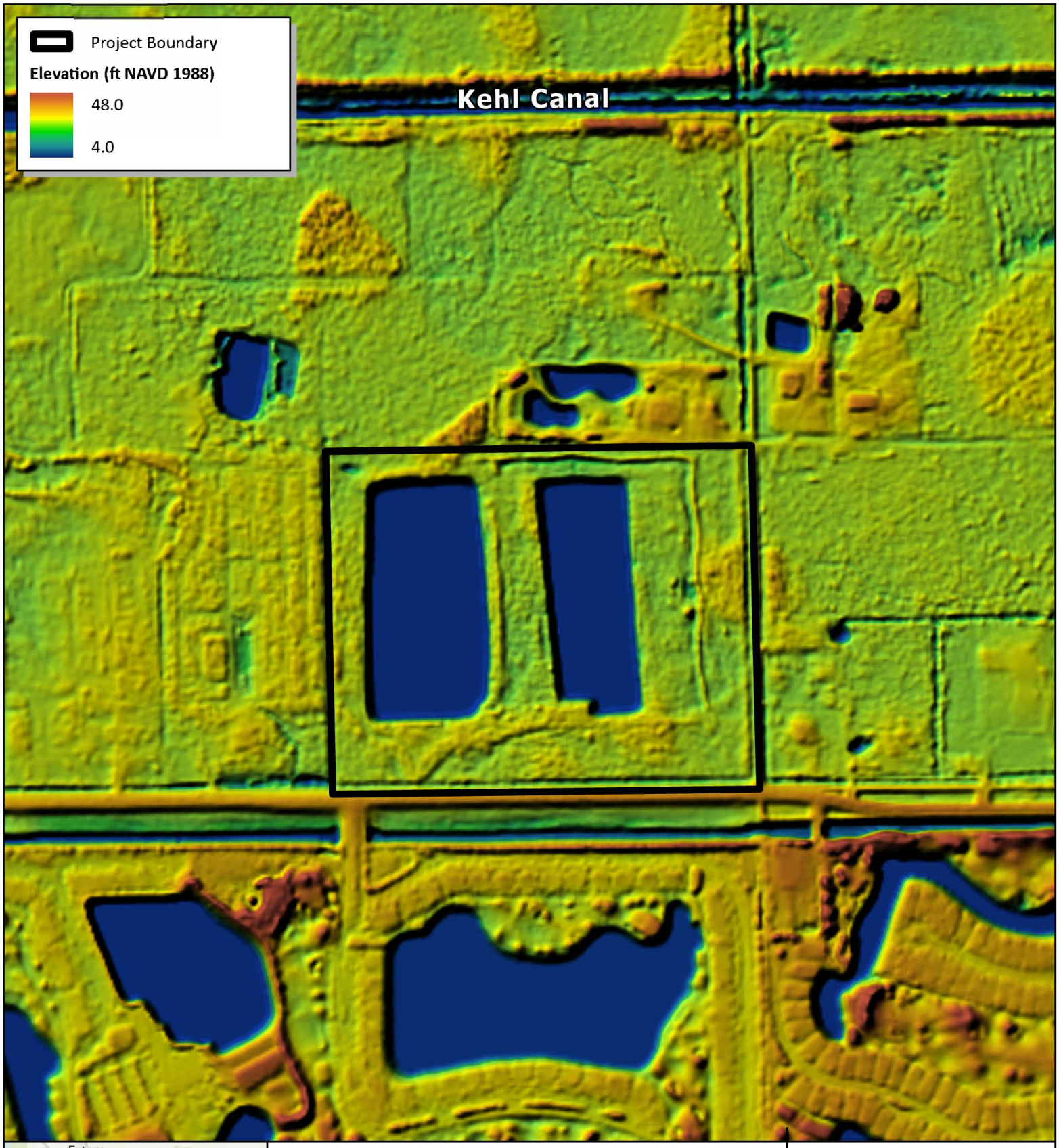




Figure 5
LiDAR
White Willow
Lee County, Florida

N

0 500 US Feet

Scale: 1:6,000

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12/9/2025

Image: Esri, Lee County 10-ft DEM (ft NAVD88)

RESPEC

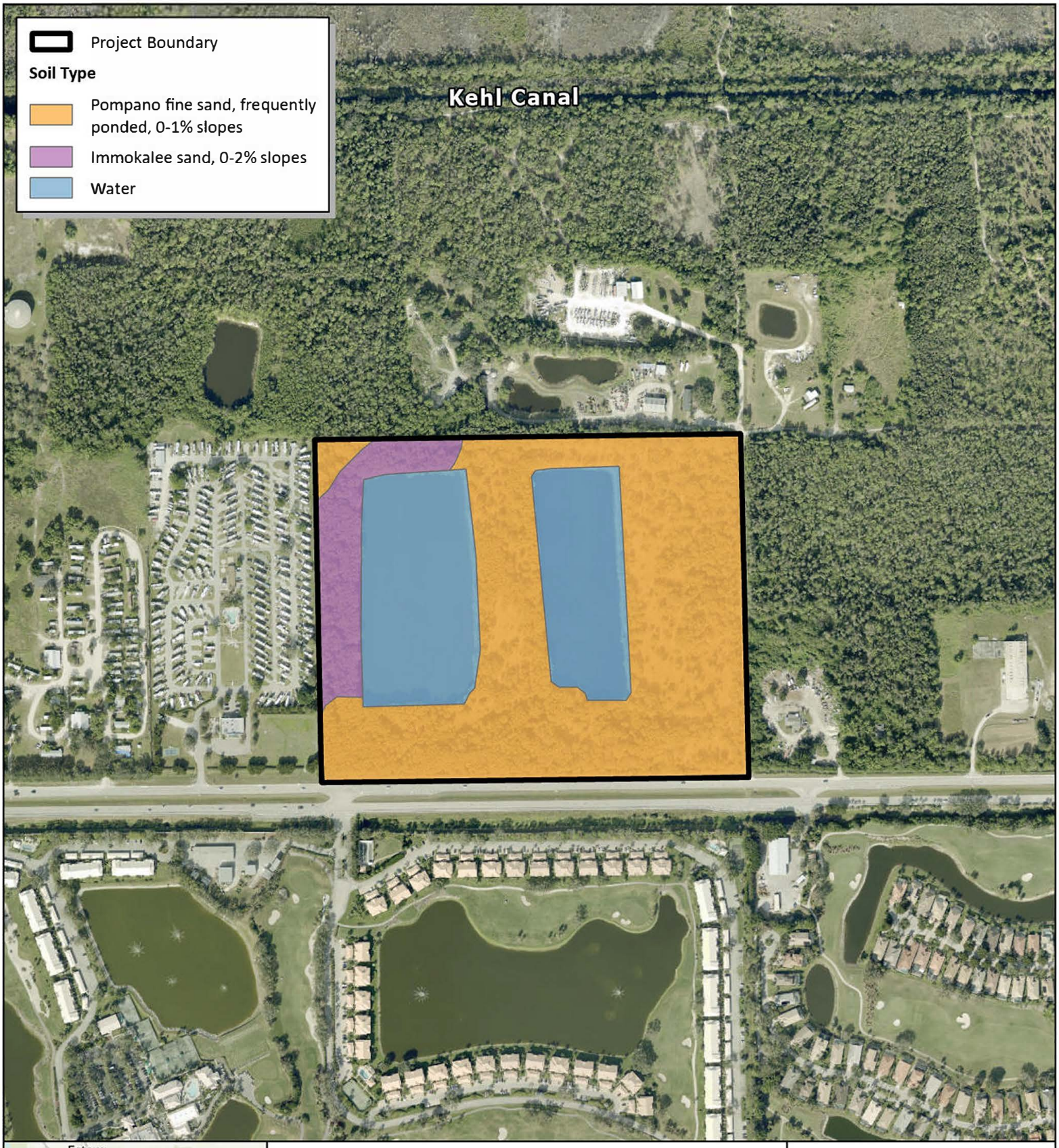




Figure 6
NRCS Soil Types
White Willow
Lee County, Florida

N

0 500 US Feet

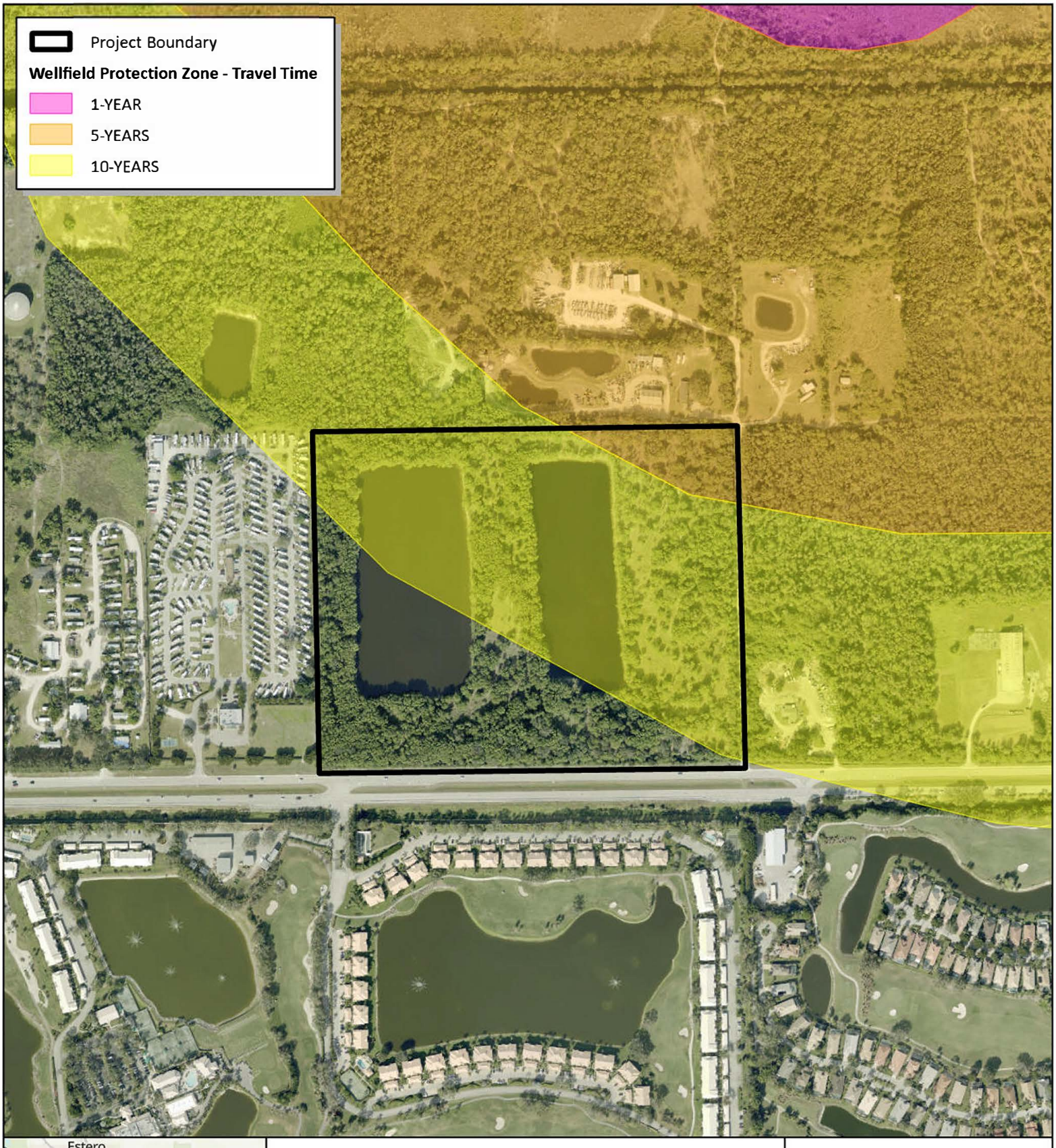
Scale: 1:6,000

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12/9/2025

Image: Esri, NRCS

RESPEC



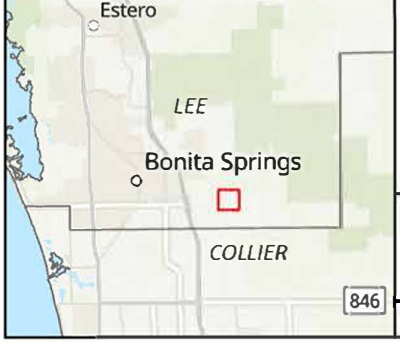


Figure 7
Wellfield Protection Zones
White Willow
Lee County, Florida

N

0 500 US Feet

Scale: 1:6,000

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12/15/2025

Image: Esri

RESPEC

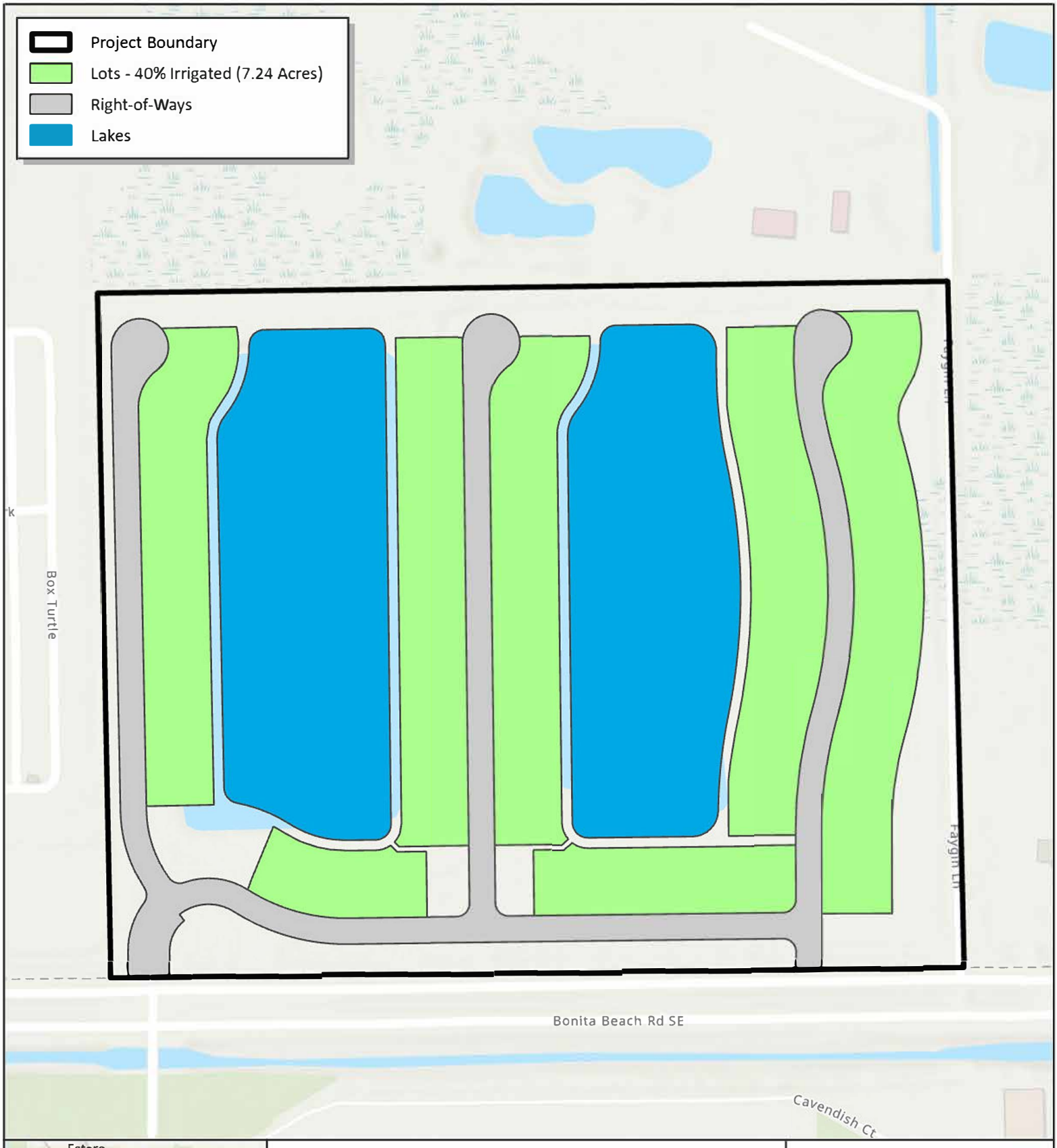


Figure 8
Conceptual Plan
White Willow
Lee County, Florida

N

0 250 US Feet

Scale: 1:3,000

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12/10/2025

Image: Esri

RESPEC



Figure 9
Predicted Lower Tamiami Aquifer Drawdown
Maximum Monthly Modeling Scenario
White Willow
Lee County, Florida

N

0 250 US Feet

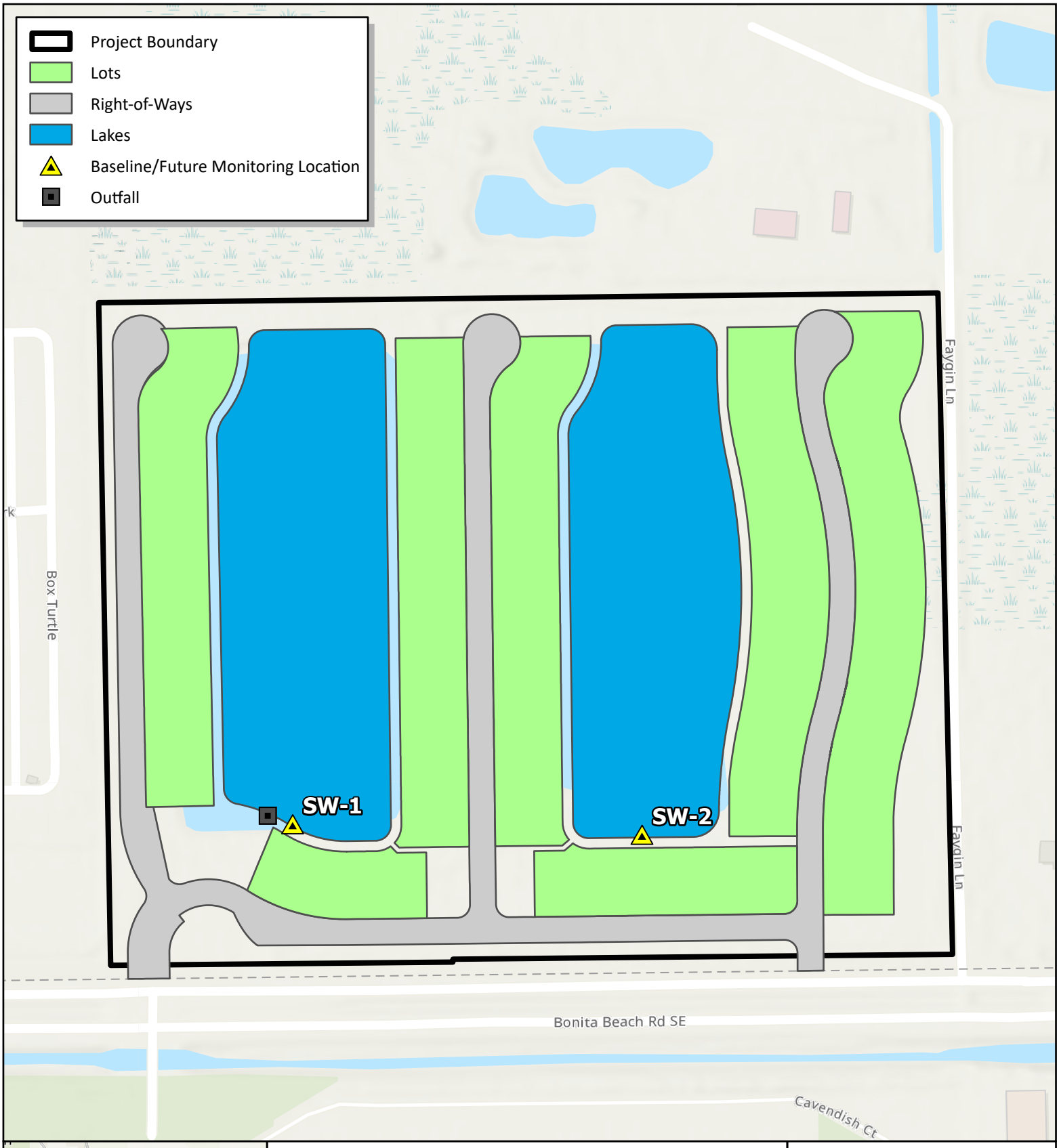
Scale: 1:3,000

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12/15/2025

Image: Esri

RESPEC



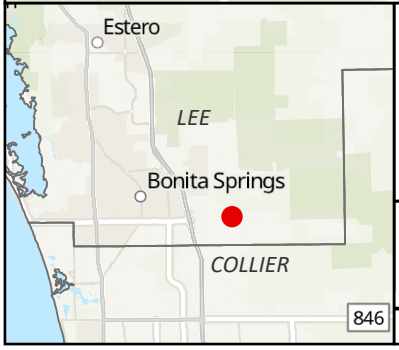


Figure 10
Water Quality Monitoring Locations
White Willow
Lee County, Florida

N

0 250 US Feet

Scale: 1:3,000

RESPEC Company, LLC has provided the images or data presented in this map for informational purposes only. This data is not intended to be used in lieu of official survey data provided by a Professional Surveyor licensed by the State of Florida

4/9/2026

Image: Esri

RESPEC

Blaney-Criddle Irrigation Demands

Attachment A

RESPEC

Calculations Of Irrigation Requirements (1-in-10)

Rainfall Station: Naples 1-in-10

Irrigation System: Sprinkler

Irrigated Acreage: 7.24

Crop: Turf Grass

Soil Type: 0.80

Multiplier 1.30

Efficiency 0.77

Calculations	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Average Rainfall (inches)	1.88	1.93	0.96	2.05	4.42	8.17	8.36	8.18	8.69	4.09	1.56	1.32	51.61
Evapotranspiration (inches)	1.93	2.21	3.76	5.09	6.66	7.44	7.88	7.51	6.47	5.00	3.22	2.26	59.43
Average Effective Rainfall (inches)	0.88	0.92	0.52	1.14	2.44	4.32	4.51	4.34	4.31	2.08	0.80	0.65	26.91
1-in-10 Effective Rainfall (inches)	0.73	0.76	0.43	0.94	2.03	3.58	3.75	3.60	3.58	1.73	0.66	0.54	22.33
Average Irrigation (inches)	1.05	1.29	3.24	3.95	4.22	3.12	3.37	3.17	2.16	2.92	2.42	1.61	32.52
1-in-10 Irrigation (inches)	1.20	1.45	3.33	4.15	4.63	3.86	4.13	3.91	2.89	3.27	2.56	1.72	37.10

1-in-10 Annual Supplemental Crop Requirement = 37.10 inches

Annual Supplemental Crop Water Use:

37.1 inches X 7.24 Acres X 1.3 X 0.02715 MG/AC-IN = 9.48 MG

1-in-10 Maximum Monthly Supplemental Crop Requirement = 4.63 inches

Maximum Monthly Supplemental Crop Water Use:

4.63 inches X 7.24 Acres X 1.3 X 0.02715 MG/AC-IN = 1.18 MG

Notes:

Evapotranspiration was calculated using a modified Blaney-Criddle method.
Average effective rainfall is the amount that is useful to crops in an average year.
Drought rainfall is the rainfall minimum representative of a 1-in-10 year drought
Drought effective rainfall is the amount that is useful to crops in a 1-in-10 year drought event.
Average irrigation is the net amount that should be required for maximum yields during an average year.
Drought irrigation is the net amount that should be required for maximum yields during a 1-in-10 year drought.

Professional Geologist Certification

Attachment B

RESPEC

6561 PALMER PARK CIRCLE
SUITE D
SARASOTA, FL 34238
941.552.5657

Professional Geologist Certification

The groundwater flow modeling impact analysis included as part of this document titled "Characterization of Ground and Surface Water Resources" for the White Willow property in Lee County, Florida, was completed based on sound geologic principals and the hydrogeologic data available at the time this modeling analysis was performed. The parameters and discretization of simulated withdrawals from the aquifer system are considered to be reasonably accurate; therefore, the Professional Geologist below certifies the results of the model as they pertain to the predicted groundwater impacts. All the preceding geological analysis and interpretation(s) were evaluated and supervised by Devin Lemke, P.G., a Registered Professional Geologist pursuant to Chapter 492, Florida Statutes, (F.S.) and Chapter 61G16, Florida Administrative Code, F.A.C.



12/10/2025

Devin Lemke, P.G. No. 3270
RESPEC Company, LLC
Professional Geologist

Date

ATTACHMENT R

Bonita Springs Utilities, Inc.

Serving Our Members For Over 50 YEARS

May 21, 2025

Carl Barraco Jr., P.E.
Barrraco and Associates, Inc.
2271 McGregor Blvd. # 100
Ft. Myers, FL 32407

Sent via e-mail: carljr@barraco.net

Re: Bonita Beach Road 50

Dear Mr. Barraco,

You have requested potable water, sewer and irrigation service for the project referenced above. Plant capacities are adequate; however, the Developer is required to install all off-site and on-site utility line extensions necessary to provide service to the project in accordance with Bonita Springs Utilities, Inc. specifications. No construction submittals have been received, reviewed or approved as of this date. This letter expires in one year.

You have estimated the usage to be 16,250 gallons per day. Bonita Springs Utilities, Inc. has the capacity to provide the above estimated gallonage from its 21 million gallon per day Water Treatment Plant. The Water Reclamation Facilities have the capacity to treat the above estimated gallonage from the plants currently rated at 11.0 million gallon per day.

Potable water is available for irrigation use as no reuse water is available in proximity to the subject property at this time.

This letter should not be construed as a commitment or guarantee to serve nor as approval for construction, but only as to the availability of potable water, sewer and reuse at this time. Bonita Springs Utilities, Inc. may commit to reserve plant capacity if available, at such time that ANC (Aid-to-New Construction) fees are paid for each unit of required capacity.

If there are any proposed utility infrastructure installations, then the appropriate meetings and submittals per the Bonita Springs Utilities specifications shall be required.

Respectfully,
Bonita Springs Utilities, Inc.

Kim Hoskins, P.E.
Director of Engineering

ATTACHMENT S

Lee County
Southwest Florida

Board of County Commissioners

Kevin Ruane
District One

Cecil L Pendergrass
District Two

Ray Sandelli
District Three

Brian Hamman
District Four

Trish Petrosky
District Five

Dave Harner, II
County Manager

Richard Wm. Wesch
County Attorney

Donna Marie Collins
County Hearing Examiner

February 18, 2026

Barraco and Associates, Inc.
2271 McGregor Blvd., Suite 100
Fort Myers, FL 33901

VIA ELECTRONIC MAIL

Re: Letter of Service Availability

Ms. Colarusso,

I am in receipt of your letter requesting a deviation from the Land Development Code, Section 10-291(3), requiring two means of ingress/egress (not including emergency-only accesses).

Lee County Public Safety has no objection to this deviation so long as the emergency access gate is electric and compatible with the existing Emergency Vehicle Access Control (EVAC) system.

Please let me know if I can be of further assistance.

Sincerely,

Paul DiCicco
Deputy Director - EMS Chief

From: Scholz, Eric
To: Lauren Colarusso
Subject: Re: White Willow RPD Letter of No Objection
Date: Thursday, February 5, 2026 4:35:30 PM

Hey Lauren,

We have no objection to your proposal of one primary access point and one emergency access point for the White Willow project.

Thank you,
Eric Scholz
Fire Marshal

Bonita Springs Fire Control & Rescue District
27701 Bonita Grande Drive
Bonita Springs FL 34135

Main: 239-949-6200
Office: 239-390-7940
Email: scholz@bonitafire.org

From: Lauren Colarusso <LaurenC@barraco.net>
Sent: Friday, January 30, 2026 2:42 PM
To: Scholz, Eric <Scholz@bonitafire.org>
Subject: RE: White Willow RPD Letter of No Objection

Fantastic. Thank you so much, Eric. Have a great weekend!

Lauren Colarusso
Barraco and Associates, Inc.
Civil Engineers – Land Surveyors – Planners
2271 McGregor Boulevard, Suite 100
Fort Myers, FL 33901
(239) 461-3170 Phone
(239) 461-3169 Fax

Fort Myers | Panama City Beach

File:

From: Scholz, Eric <Scholz@bonitafire.org>
Sent: Friday, January 30, 2026 2:42 PM
To: Lauren Colarusso <LaurenC@barraco.net>
Subject: Re: White Willow RPD Letter of No Objection

Lee County
Southwest Florida

Board of County Commissioners

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District Two

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February 18, 2026

Barraco and Associates, Inc.
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Fort Myers, FL 33901

VIA ELECTRONIC MAIL

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Please let me know if I can be of further assistance.

Sincerely,

Paul DiCicco
Deputy Director - EMS Chief

ATTACHMENT T

From: DeGuzman, Joel
To: Groth, MarySue
Subject: RE: Original Application Submitted - DCI2025-00028 / White Willow RPD
Date: Tuesday, January 6, 2026 8:45:51 AM
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png
image007.png

Caution: This email originated from an external source. Be cautious of attachments and links, and do not provide login information. Report suspicious activity to the Service Desk: servicedesk@leegov.com or 533-HELP.

The School District of Lee County has no objections to this proposed development. The requested density of 102 residential units is projected to produce fewer than 10 school-age children, and thus not impact school capacity in the area.

Joel DeGuzman, CST III
District Planning Coordinator,
Capital Planning
2855 Colonial Blvd, Fort Myers, FL 33966
o: 239-337-8368
c: 239-822-8362
JoelSD@leeschools.net
www.leeschools.net
THE SCHOOL DISTRICT OF LEE COUNTY



ATTACHMENT U

Lee County Community Development

LEE COUNTY BOARD OF COUNTY COMMISSIONERS

ZONING
and
COMPREHENSIVE PLAN AMENDMENT HEARING AGENDA

Wednesday, August 19, 2026
9:30AM

DCI2025-00014 Z-26-011	Honc 41 MPD
DCI2025-00022 Z-26-012	601 Leeland Rezone
CPA2026-00004	Southeast Lee County Update

CPA2026-00004

Southeast Lee County Update

SUMMARY SHEET
CPA2026-00004 – Southeast Lee
LPA RECOMMENDATION

PROPOSED AMENDMENTS:
Amend the Lee Plan's Future Land Use Element, Property Rights Element, Glossary, and Appendix to update the Southeast Lee County Community Plan Area, update policies related to development in Southeast Lee, and the related maps and table to better reflect current conditions, remove overlays and allow nonresidential uses to simplify regulations and reduce redundancies, and establish guardrails for development that will adequately protect the county's water resources and wildlife habitat in the future. The proposed amendments are consistent with the BoCC direction from April 1, 2025, and April 21, 2026.

LPA PUBLIC HEARING:
Staff provided a detailed presentation of the proposed text and map amendments, addressing planning rationale, impacts of the proposed changes, and consistency with the Lee Plan.

Members of the LPA acknowledged the effort that went into the proposed amendments and then inquired about the intent of some of the terminology used in the presentation, clarification on the need for a Development Agreement in addition to Planned Developments, clarification on the applicability of Conservation Communities in other places in the County, and recommended additions to Goal 165.

LPA PUBLIC INPUT:
Thirteen members of the public spoke on the proposed amendments. Comments included concern regarding the process, the implications of the proposed amendments on water quality, additional requests from the applicants of the privately-initiated amendments, appreciation for the direction staff took with the proposed amendments, changing conditions in Southeast Lee the amendments are meant to address, requesting additional FAR allowances for industrial development, the positive impact of the proposed amendments on Lehigh Acres, the positive impact of adding nonresidential uses to reduce trip and add jobs, concern over wildlife habitat, concern about density incentives, the changing statutory requirements for comprehensive planning, the general compatibility of the amendments with the natural resources in Southeast Lee, concern that the new allowances will create more development demand, and concern that these amendments could apply to other places in the County.

LPA MOTION:
A motion was made to recommend that the Board of County Commissioners (BoCC) transmit CPA2026-00004, with the following changes: remove additional portions of the Daniels Tradeport property from Southeast Lee, include the Freeman property in the Preservation and Innovation future land use category, clarify the terms adequate protection and alongside, and add language to Goal 165. The motion passed 4 to 0.

Staff generally agrees with the LPA motion. Additional details, discussion, and recommendations are provided in Part 2C of the staff report.

STAFF RECOMMENDATION:
Staff recommends that the BoCC ***transmit*** the proposed amendment as provided in Attachment 1, as revised.

STAFF REPORT FOR CPA2026-00004:
Southeast Lee Community Plan Area

County-Initiated Lee Plan Map and Text Amendments

Recommendation:
Adopt

Applicant:
Lee County BOCC
Direction on April 21, 2026

Representatives:
Lee County Planning Section, Department of Community Development

Amended Elements:
Future Land Use
Property Rights
Glossary

Amended Maps:
1-A, 1-D, 2-A, 2-D, 4-A, 4-B

Amended Tables:
1(a)

Planning District:
District 18, Southeast Lee

Commissioner Districts:
District 2 – Cecil Pendergrass

District 3—David Mulika

Hearing Dates:
LPA: July 27, 2026
BOCC #1: August 19, 2026
BOCC #2: TBD

Attachment(s):
1: Proposed Amendments
2: Draft LDC Amendments

REQUEST

- Amend the Lee Plan's Future Land Use Element, Property Rights Element, Glossary, and Appendix to update the Southeast Lee County Community Plan Area, update policies related to development in Southeast Lee, and the related maps and table to better reflect current conditions, remove overlays and allow nonresidential uses to simplify regulations and reduce redundancies, and establish guardrails for development that will adequately protect the county's water resources and wildlife habitat in the future.
- Move the Planned Development requirements for Southeast Lee County to the Land Development Code (LDC).

SUMMARY

This amendment to the Lee Plan was initiated by the county in response to eleven privately-initiated amendments within the Southeast Lee County Community Plan Area. The proposed modifications will update the Lee Plan and introduce a new Southeast Lee County section to the Land Development Code (LDC). These LDC updates will follow the standard LDC amendment procedures. Planning staff collaborated extensively with County departments, private applicants, conservation organizations, and public stakeholders throughout the development of these proposed changes.





RECOMMENDATION

Staff recommends that the Board of County Commissioners (BoCC) ***adopt*** the proposed amendment as shown in Attachment 1.

PART 1

STAFF DISCUSSION AND ANALYSIS

BACKGROUND

The Southeast Lee County Community Plan Area encompasses most lands south of SR 82, east of Gateway, the Southwest Florida International Airport (RSW), the Village of Estero, and the City of Bonita Springs, and north of Bonita Beach Road. Lee Plan Goal 33 provides the goals and policies for development in this area. Goal 33 is provided below.

> ***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.*

This goal is currently supported by three (3) objectives: Objective 33.1, Water, Habitat, and Other Natural Resources; Objective 33.2, Residential and Mixed-Use Development; and Objective 33.3, Southeast Lee County Transfer of Development Rights Program. Generally, these objectives protect natural resources, limit development to the areas indicated on Map 2-D, and incentivize relocating development to uplands or other parts of the County.

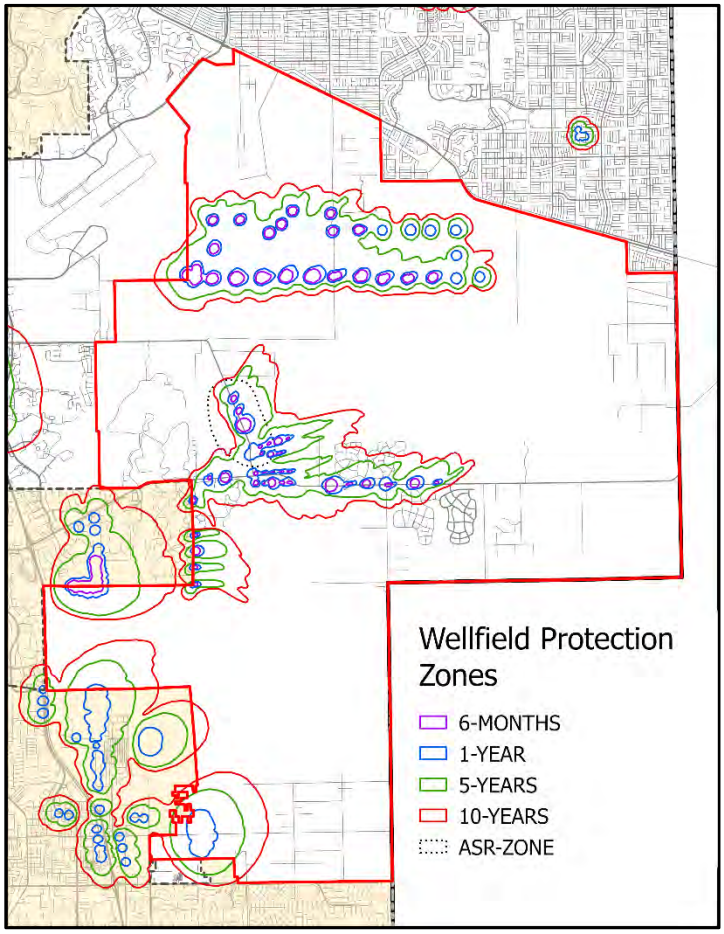


Figure 1: Wellfield Protection Zones

The Southeast Lee Community Plan Area emphasizes conserving water resources and improving water quality. Southeast Lee County supports many of the county's wellfields for public water supply. Ensuring long-term water conservation and preservation is very important in this part of the county. See Figure 2.

This area of the county is generally characterized by very low-density development (less than 1 unit per acre) and active mines. The predominant land use categories in Southeast Lee County are Density Reduction/Groundwater Resource (DR/GR), Conservation, and Wetlands. There are a number of properties with existing Tradeport, General Interchange, and Public Facilities designations.

The Density Reduction/Groundwater Resource (DR/GR) designation was given to most of Southeast Lee County in 1990 to settle a legal dispute with the Florida Department of Community Affairs, the State planning agency, for two main reasons. First, to protect the shallow aquifers, which are underground water sources. Second, the state required Lee County to reduce its projected population by allocating a lower population limit using the Future Land Use Map and Table 1(b). At that time, Florida's Growth Management Act required local governments to plan for a maximum population; however, this requirement was removed in 2011.

In 2008, Dover, Kohl & Partners completed a four-part study for the county. This study helped create the Southeast Lee Community Plan Area and its associated overlay districts. The study included "Prospects for Southeast Lee County: Planning for the Density Reduction/Groundwater Resource Area (DR/GR)," "Natural Resource Strategies for Southeast Lee County," "Transferable Development Rights In Southeast Lee County," and "Proposed Lee Plan Amendments for Southeast Lee County." The four-part study was in response to direction by the Board of County Commissioners (BOCC) to take a proactive role in addressing competing needs in Southeast Lee County and to identify appropriate locations for various uses of land. The study helped develop Maps 1-D and 2-D and resulted in the establishment of Goal 33, Southeast Lee County.

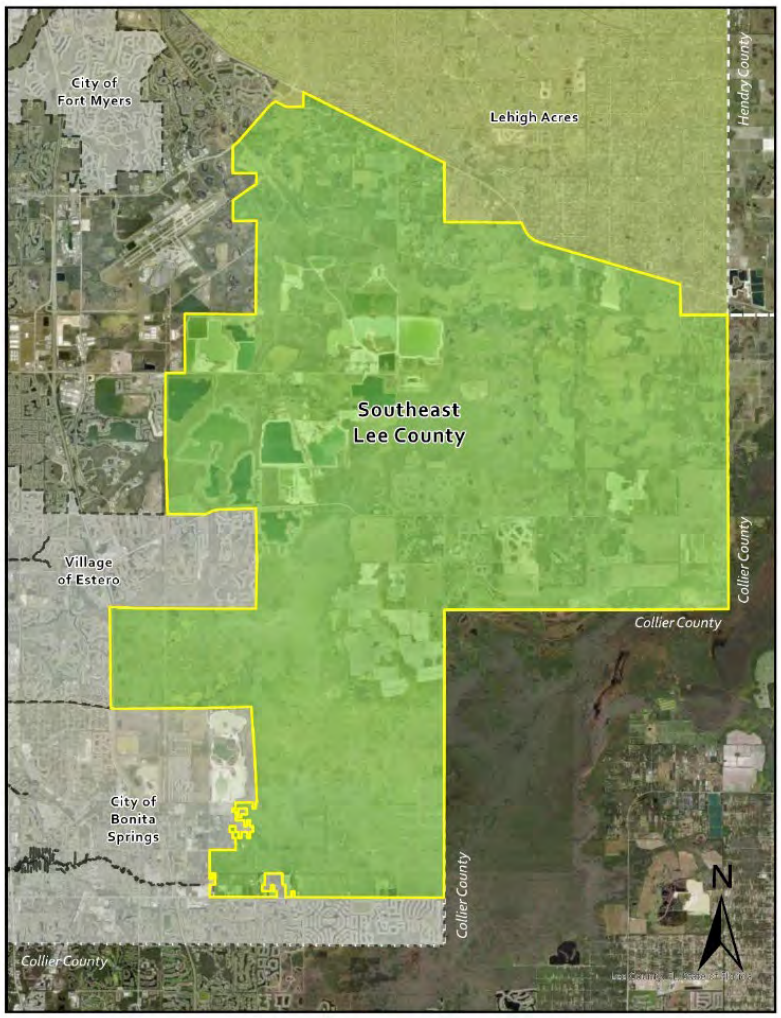


Figure 2: Southeast Lee Existing Boundary and Surrounding Communities

The majority of Southeast Lee is located just South of Lehigh Acres and borders Collier County. Currently, Southeast Lee is a mixture of semi-platted large-lot subdivisions, planned residential and mixed-use developments, mines, golf communities, and agricultural estates. The residential and mixed-use communities are mostly located along Corkscrew Road. Kingston is a new mixed-use community connecting Lehigh Acres on the North side of State Road 82 to Corkscrew Road. The County has acquired property between Alico Road and State Road 82 to extend Alico Road to connect with Sunshine Boulevard, thereby establishing a new major North-South connector between Lehigh Acres and the employment centers located in proximity to Alico Road, RSW, and Florida Gulf Coast University.

The southwestern corner of Southeast Lee borders the City of

Bonita Springs. This area has a distinctly different development pattern from Southeast Lee as a whole. Currently, there is a townhouse development, farm worker housing, and a couple of existing large lot residential developments. See Figure 3 for a General Location Map of Southeast Lee on page 3.

A large percentage of the Southeast Lee County Community Plan Area is preservation areas owned by the State of Florida, Lee County, or other conservation groups. See Figure 5. Additionally, most of Southeast Lee County is also designated as primary or secondary panther habitat. See Figure 4, Panther Habitat.

The Southeast Lee County Community Plan Area was adopted in 2010. In the last few years, Southeast Lee County has seen significant new development driven by court decisions and existing Lee Plan programs. This growth has led to expanded road networks and utility infrastructure, increasing demand for new types of development, as evidenced by the volume of privately initiated amendments. The Southeast Lee County Community Plan Area and related Lee Plan policies should be updated to guarantee that future growth in this area preserves the County's natural resources and aligns with its long-term development vision.

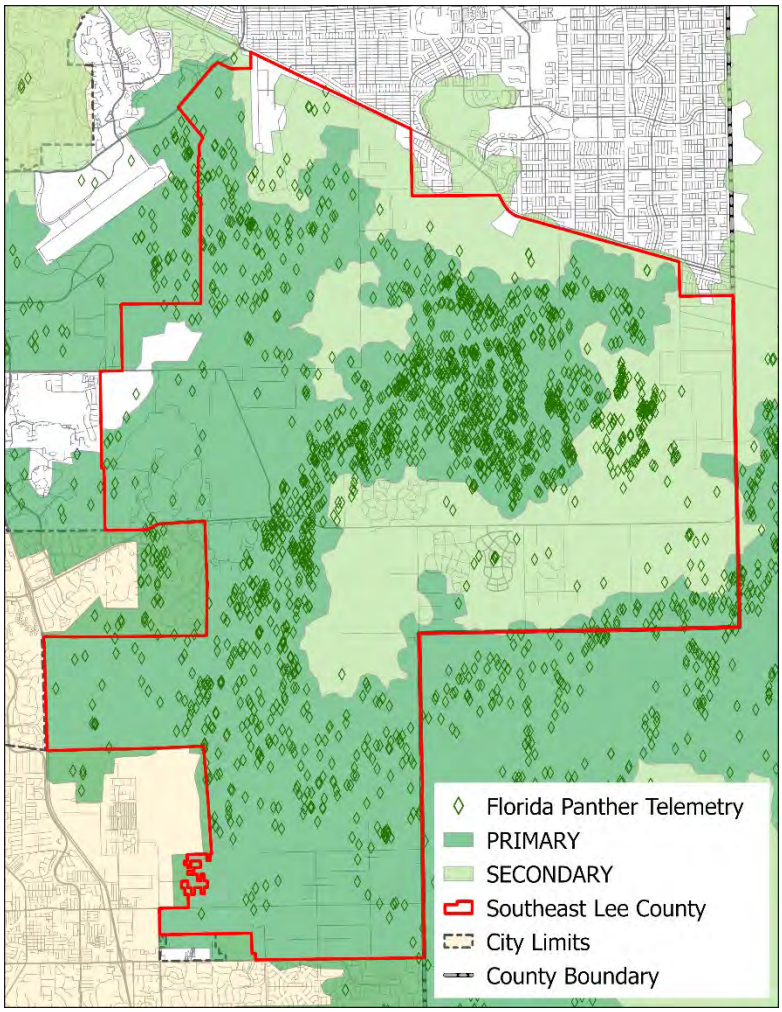


Figure 3: Panther Habitat

On April 1, 2025, the BOCC directed staff, "to bring back proposed amendments to increase efficiency, reduce unnecessary regulations, while maintaining the protections of public health safety and welfare, and meeting State and Federal mandates." The proposed amendments are directly related to this motion. Because the motion applied broadly to the Lee Plan and Land Development Code, staff anticipates that additional amendments made under this direction may affect the final location of the Southeast Lee amendment package within the text of the Lee Plan.

From 2023 to 2026, the County's Planning Section received eleven privately initiated text and map amendments to support projects within the Southeast Lee County Community Plan Area. Rather than reviewing each case separately, staff asked the Board of County Commissioners for specific direction to consider the text amendment requests collectively to ensure clear, consistent language, reduce redundancies, and increase efficiency, consistent with the Board's April 1, 2025, direction. **The Board**

directed staff to proceed with County-Initiated Amendments to Southeast Lee County on April 21, 2026, with two unanimously approved motions:

1. *Direct staff to prepare amendments to the Lee Plan, relating to the Southeast Lee County Community Plan Area, to manage growth, streamline the Southeast Lee County Overlays, reduce unnecessary regulations, and encourage development that preserves or restores the County's natural resources.*
2. *Direct staff to pause processing the following privately-initiated text amendments to the Southeast Lee County Community Plan Area: CPA2024-00002, CPA2024-00012, CPA2025-00006, and CPA2026-00001.*

Table 1 lists the privately initiated amendments and their general requests to illustrate the importance of a county-initiated amendment and to provide a reference based on the application numbers and requests in this report. The data and analysis provided in the privately initiated requests may also be used to justify the County-Initiated text and map amendments. All of the application materials for the privately-initiated amendments are incorporated by reference into the county-initiated amendment. When data from a privately initiated request is used, staff will provide a citation in the footnotes indicating which application it originated from.

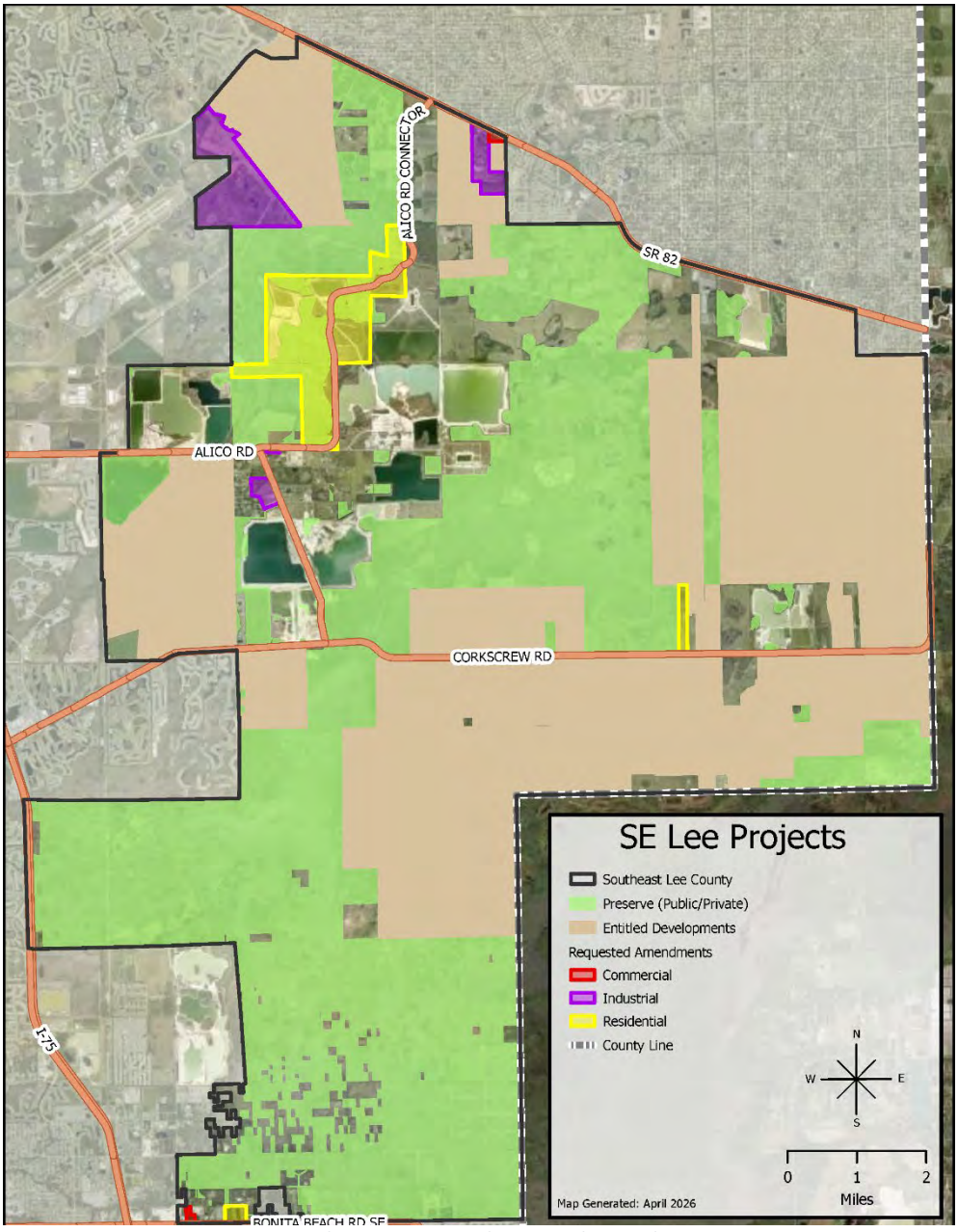


Figure 4: Southeast Lee Privately Initiated Amendments Map

Table 1: Privately-Initiated CPA Requests

CASE NUMBER	PROJECT NAME	REQUEST	CONSULTING TEAM
CPA2023-00009	Dante Commercial	• Map 1-A (DR/GR & Wetlands to Commercial & Wetlands) • Map 1-F (Remove Private Rec Fac. Overlay)	RVi Planning + Landscape Architecture
CPA2024-00001	Bonita Beach Commercial	• Map 1-A (DR/GR & Wetlands to Sub-Outlying Suburban & Wetlands)	RVi Planning + Landscape Architecture
CPA2024-00002	Bonita Beach Commercial	Text Amendment to remove the commercial cap in Policy 33.2.5 and allow commercial uses in Goal 33	RVi Planning + Landscape Architecture
CPA2024-00011	Corkscrew 80 Residential	• Map 1-D (Designate as Tier 1) • Map 2-D (Designate as EEPCO • Maps 4-A and 4-B (LCU Water and Sewer Services Areas)	RVi Planning + Landscape Architecture
CPA2024-00012	Corkscrew 80 Residential	Text Amendment to changes for Goal 33 to change the EEPCO locational and size requirements	RVi Planning + Landscape Architecture
CPA2025-00006	Alico Tradeport Industrial	Text Amendment to Goal 33 to allow industrial uses in Southeast Lee	Ensite
CPA2025-00009	Daniels Tradeport Industrial	• Map 1-A (DR/GR & Wetlands to Tradeport & Wetlands) • Map 2-A (Remove property from Southeast Lee) • Maps 4-A and 4-B (LCU Water and Sewer Areas)	Morris DePew & Associates
CPA2025-00010	Alico Tradeport Industrial	• Map 1-A (DR/GR to Tradeport) • Maps 4-A and 4-B (LCU Water and Sewer Areas)	Ensite
CPA2025-00011	SR 82 Freeman Industrial	• Map 1-A (DR/GR to Tradeport) • Maps 4-A and 4-B (LCU Water and Sewer Areas)	RVi Planning + Landscape Architecture
CPA2025-00013	White Willow Residential	• Map 1-A (DR/GR to Outlying Suburban)	Daniel Delisi
CPA2026-00001	Bluewater Ridge Residential	Text Amendments to Goal 33 to create a new mine reclamation overlay to facilitate new residential development on an existing mine site	RVi Planning + Landscape Architecture

Staff's proposed amendments balance the privately initiated amendment requests with the county's interest in long-term water quality, appropriate development standards, and environmental protection by examining community needs, environmental conditions, and private property rights. Staff's proposed language minimizes redundancy and inconsistency and addresses the County's overarching goals for the Southeast Lee County Community Plan Area.

PROCEDURAL REQUIREMENTS

The Lee Plan is Lee County's comprehensive plan, providing the long-term vision for the county's development. Florida Statutes require comprehensive plans to include certain topics as elements. The Lee Plan divides these elements into chapters, which are further supported by goals, objectives, standards, and policies. Lee Plan Chapter XIII, entitled Administration, section "d" addresses Amendments to the Plan. The applicable paragraph is reproduced below.

> *This plan, including the Future Land Use Map, may be amended in accordance with Florida Statutes and administrative procedures adopted by the Board of County Commissioners in Lee County Administrative Code 13-6. In accordance with § 163.3177(1)(f), Fla. Stat., all amendments must be based upon relevant and appropriate data and analysis.*

Lee County Administrative Code 13-6 establishes procedures for amending the Lee Plan, including notice requirements and public participation provisions. According to Florida Statutes and AC 13-6, the proposed amendments are County-Initiated Amendments, meaning they are proposed amendments directed by an affirmative vote of three or more Commissioners. The BOCC provided specific direction to pursue these amendments on April 21, 2026, in addition to the previous direction to simplify the LDC and Lee Plan provided on April 1, 2025.

County-initiated amendments have slightly different requirements from privately initiated amendments. According to AC 13-6, County-Initiated Amendments must follow sections C and D.1. Sections B and D.2, which set forth requirements for applications, fees, and Courtesy Notices, do not apply. No sign postings or mailed Courtesy Notices are required under AC 13-6 or Florida Statute, even though the proposed amendments would change the Future Land Use designations for privately owned properties. **The proposed amendments have followed the applicable procedures under AC 13-6.**

County-initiated amendments follow the **Expedited State Review** process under F.S. 163.3184(2)(a), which requires one public hearing before the Local Planning Agency for a recommendation to the BOCC and two public hearings before the BOCC. Applications that follow the Expedited State Review process also require review by the State Reviewing Agencies. **The proposed amendments will continue to follow the applicable process under F.S. 163.3184.**

PUBLIC OUTREACH & DEPARTMENT COLLABORATION

Lee Plan Objective 17.3 states that the county will "provide opportunities for public input as part of the comprehensive plan and land development code process." The Southeast Lee County Amendments have included extensive input from the public and subject-matter experts in Lee County, as well as professionals from local nonprofit organizations and consulting firms.

Most of the privately-initiated amendments shown in Table 1 on page 6 held public information meetings regarding their proposed amendments, consistent with Objective 17.3, even though none of the applications have been found sufficient as of the date of this report. Table 2 provides the dates and locations of the public input meetings held by the applicants for the privately-initiated requests**. These**

meetings covered only the application requests in the context of the Lee Plan at the time of the meeting, but they did provide an opportunity for the public to ask questions and provide feedback on the application requests.

Table 2: Privately-Initiated Public Meeting Dates

APPLICATION(S)	NAME	DATE	LOCATION
CPA2023-00009	Dante Commercial	NA	NA
CPA2024-00001 CPA2024-00002	Bonita Beach Commercial	7/28/2025	13660 Bonita Beach Road SE, Bonita Springs, FL 34135
CPA2024-00011 CPA2024-00012	Corkscrew 80 Residential	4/2/2025	20351 Corkscrew Rd, Fort Myers, FL 33928
CPA2025-00006 CPA2025-00010	Alico Tradeport Industrial	3/25/2026	14800 Alico Road, Fort Myers, FL 33912
CPA2025-00009	Daniel's Tradeport Industrial	3/31/2026	17320 Corkscrew Rd, Estero, FL 33928
CPA2025-00011	SR 82 Freeman	NA	NA
CPA2025-00013	White Willow Residential	4/21/2026	16999 Dormie Drive, Estero, FL 33928
CPA2026-00001	Bluewater Ridge Residential	NA	NA

In addition to the information sessions held by the applicants on their application requests, Table 3 outlines the major meetings on the proposed County-Initiated amendments with stakeholders, applicants, surrounding municipalities, and county staff.

Table 3: County-Initiated Meeting Summary

MEETING TYPE	LOCATION	DATE	ATTENDEE(S)
Department	Public Works Building	1/14/2026	County Attorney's Office
Applicant	Teams	2/3/2026	Morris DePew & Associates
Applicant	Teams	2/4/2026	Ensite
Applicant	Teams	2/6/2026	RVi Planning +Landscape Architecture
Applicant	Teams	2/13/2026	Delisi Planning
Board Meeting – AIR	Commission Chambers	4/21/2026	Public/Board
Department	Public Works Building	5/6/2026	Natural Resources
Department	Teams	5/7/2026	Solid Waste
Department	Teams	5/11/2026	Port Authority

Department	Public Works Building	5/11/2026	Lee DOT
Department	Teams	5/15/2026	Utilities
Stakeholder Round Table	Admin East	5/18/2026	Applicants, Members of the Public, County Staff, and Conservation Groups
Department	Teams	5/22/2026	Public Safety
Department	Public Works Building	5/26/2026	Planning GIS
Municipality	Teams	6/3/2026	City of Bonita Springs
Municipality	Teams	6/4/2026	City of Estero
Department	Public Works Building	6/10/2026	Development Services
Department	Public Works Building	6/19/2026	Natural Resources
Department	Public Works Building	6/19/2026	County Attorney's Office
Department	Public Works Building	6/26/2026	Planning GIS
Department	Public Works Building	6/26/2026	Zoning

Per **Policy 17.3.1**, County staff held meetings with the public to provide information on planning best practices and the comprehensive planning process, and to receive feedback on the proposed amendments. Attendees at the public meetings were provided with copies of the most recent draft changes and encouraged to send comments, questions, or concerns to planning staff. Comments from stakeholders, county departments, and applicants were considered and incorporated into the final version of the amendments when appropriate.

In addition to meetings with stakeholders, applicants, and county staff, the Department of Community Development, Planning Section website was updated to include a designated section detailing meetings, drafts, and anticipated timelines for the County-Initiated amendments.

The proposed amendments have met and exceeded the public outreach requirements in Administrative Code 13-6, Florida Statutes, and the Lee Plan.

AMENDMENTS & RATIONALE

The Amendments & Rationale section of the staff report will provide strikethrough and underline for the proposed changes, along with the reasoning for each amendment. The amendments will be organized by topic rather than by the order they appear in Attachment 1, beginning with the amendments to the Southeast Lee County Community Plan Area (Goal 33), followed by amendments relating to nonresidential uses, residential uses, and other supporting amendments. This section will not address how the proposed amendments are consistent with the Lee Plan; for that, see the Lee Plan Analysis on page 29.

NONRESIDENTIAL DEVELOPMENT & FAR

Lee Plan Goal 33 establishes the Southeast Lee County Community Plan Area. Currently, this goal limits the allowed uses in Southeast Lee County to agriculture, conservation, recreation, residential, and

resource extraction. One of the primary reasons for the proposed amendments was to allow nonresidential uses in Southeast Lee County to support job creation and general livability for residents in Southeast Lee County and the surrounding areas. **One of the first changes was to amend Goal 33 to generally allow all use types, but limit them to those compatible with the County's water resources and wildlife habitat in Southeast Lee.**

> **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.~~ A variety of uses may be permitted when developed in accordance with the goals, objectives, and policies in the Lee Plan, the Wellfield Protection Ordinance, Land Development Code, and other applicable environmental protection requirements.

To allow nonresidential uses, Policy 33.2.5 needed to be struck:

> ~~**POLICY 33.2.5:** Commercial uses may only be permitted if incorporated into a Mixed-Use Community, Environmental Enhancement and Preservation Community, or Rural Golf Course Community depicted on Map 2-D. The maximum commercial floor area that may be approved within the Southeast Lee County community plan area may not exceed 300,000 square feet.~~

The 300,000-square-foot limit was originally set in the 2010 amendments to the Lee Plan, which established the Southeast Lee County Community Plan Area following objections from the Florida Department of Community Affairs. Initially, the amendments did not include a cap on non-residential development. However, the state reviewing agency was concerned that the amendments lacked clear and predictable guidelines for the maximum intensity of nonresidential uses, especially regarding development rights transferred to the Mixed-Use Communities and TDR receiving areas outside the DR/GR area. Lee County then revised the amendments to introduce a 300,000-square-foot limit on nonresidential space in any Mixed-Use Community using TDR credits. No nonresidential development resulted from the Mixed-Use Communities amendments.

Nonresidential uses were later permitted in developments outside the Mixed-Use Communities in Southeast Lee. This change led to commercial development aligned with Policy 33.2.5. Specifically, WildBlue, Verdana Village, and Old Corkscrew Golf Club created 240,000 square feet of commercial development. However, two additional developments were approved through court decisions, via settlement agreements, outside the usual County public hearing process, allowing an additional 800,000 square feet of non-residential space within the Community Plan Area.

The Settlement Agreements created two problems for the Community Plan Area: a property rights issue, as no one else would be allowed to have nonresidential uses if the cap remained in place, and a traffic issue. Without an adequate amount of nonresidential uses in this area, residents will be forced to drive farther to access everyday goods, services, and jobs, resulting in even more traffic. This policy was established before most of the development in Southeast Lee, and no longer aligns with realistic future development conditions. 300,000 square feet of commercial space for the entirety of Southeast Lee

County is not feasible and results in a shortfall of approximately 1 million square feet of nonresidential space, even with the additional square footage associated with the Settlement Agreements[1]. The current restriction acts as a market constraint that limits economic opportunities, increases vehicle trip lengths, and generally reduces the livability of this area of the county by preventing everyday essentials from being located near existing residential uses.

Instead of the commercial cap in Policy 33.2.5, the proposed amendments add Objective 33.4 to Goal 33 to provide the guiding policies for nonresidential uses in this area of the county.

> **OBJECTIVE 33.4: NONRESIDENTIAL USES.** Livability in Southeast Lee County requires the allowance of nonresidential uses to provide employment opportunities and reduce the number and duration of vehicle trips. Due to the potential environmental impacts of certain nonresidential uses, limitations are required to protect the County's water resources and safeguard natural resources. Similar to residential development in Southeast Lee County, nonresidential development must create, improve, preserve, and/or restore strategic surface and groundwater resources and indigenous wildlife habitats while balancing the need for commercial, industrial, and office uses to support the existing and anticipated surrounding residential development.
>
> > **POLICY 33.4.1:** Commercial, light industrial, and office uses within the Southeast Lee County Community Plan Area must have a future land use designation of Preservation and Innovation or Conservation Community and provide hydrological connections to regional watersheds, wildlife habitat connections to publicly- or privately-owned conservation lands, or strategic infrastructure connections to benefit the county's water resources.
> >
> > **POLICY 33.4.2:** The County will create LDC requirements for nonresidential uses in the Southeast Lee County Community Plan Area.
> >
> > **POLICY 33.4.3:** Nonresidential development in Southeast Lee County must demonstrate compliance with the established LDC requirements through a planned development and development agreement accepted by the County Attorney's Office.
> >
> > **POLICY 33.4.4:** To preserve open space and ensure lower-intensity development, nonresidential development in Southeast Lee County may not exceed a Floor Area Ratio of 0.25.

The new Objective establishes the guiding principles for nonresidential development in Southeast Lee, with requirements very similar to those of the existing Environmental Enhancement and Preservation Community Overlay. Instead of trying to make an existing Future Land Use Category work in Southeast Lee County or creating a new overlay in Southeast Lee, **Policy 33.4.1 establishes that new Future Land Use Categories, Preservation and Innovation, and Conservation Community, are the only categories in which nonresidential uses, not currently allowed in the DR/GR, are appropriate**.

The new categories have also been added to Lee Plan Goal 1 as new policies. The Preservation and Innovation category is a new nonresidential category. Conservation Community is a new residential category that also permits limited nonresidential uses.

[1] Commercial study included in CPA2024-00002. The consultants estimated that 45 SQFT of nonresidential uses is needed to support every residential unit. The study estimated that there were 28,000 approved housing units in Southeast Lee as of May 2025, which would yield a need of 1.2 million SQFT of nonresidential space, without considering any additional units or any residential units in Lehigh Acres, which is adjacent to Southeast Lee.

POLICY 1.1.16: The **Preservation and Innovation** future land use category is connected to central utilities and located along arterial or major collector roadways in the Southeast Lee County Community Plan Area, with the intent of balancing ecological, hydrological, and wildlife preservation with employment and commercial needs within the County. Office, light industrial, and commercial uses are encouraged when designed to preserve or restore surrounding natural resources. This category requires a large percentage of open space and the restoration of environmentally sensitive lands to protect the County's water resources and Southeast Lee County's natural resources. Uses that have a significant impact on ground and surface water levels or quality, are known producers or users of noxious gases or chemicals, or have other detrimental impacts on the natural environment, as demonstrated by appropriate data and analysis and verified by the County, may not be permitted. This land use category does not permit general residential uses. Caretaker's residences and dormitory-type accommodations for employees or individuals associated with the business may be permitted as part of the Floor Area Ratio (FAR) calculation when accessory to a nonresidential use. Development in this category is limited to an FAR of 0.25 and is encouraged to promote a park-like aesthetic, with pedestrian connections, extensive green spaces, and minimal linear commercial centers. Applications for rezoning must follow the planned development rezoning process in accordance with the Land Development Code.

POLICY 1.4.8: The **Conservation Community** future land use category denotes areas of low-density, clustered residential and mixed-use development within the Southeast Lee County Community Plan Area. Development in this category must connect to a potable water and sanitary sewer system. This category requires a large percentage of open space and the restoration of environmentally sensitive lands to protect the County's water resources and Southeast Lee County's natural resources. The standard density is 1 unit per 10 acres, with a maximum density of 1.15 units per acre when the community is designed as a planned development in accordance with the Land Development Code. Development in this category is encouraged to promote a park-like aesthetic, with pedestrian connections and extensive green spaces. Nonresidential and multifamily uses may be allowed when developed alongside low-density residential uses. These uses are limited to a maximum total FAR of 0.15, based on the acreage allocated to non-residential and multi-family uses. A traditional Main Street design with vertically mixed buildings, adjacent to park space, is encouraged for developments that utilize the FAR allowance; standalone linear commercial development is discouraged.

Two major changes in the proposed amendments are the removal of specifics related to the planned development (PD) from the Lee Plan to the Land Development Code (LDC) and the inclusion of Floor Area Ratio (FAR) as a limiting factor on the intensity (i.e., size) of allowed nonresidential development. The Staff Report will address the move of PD requirements to the LDC as part of the discussion of the proposed changes to the residential development in Southeast Lee, where the changes are more apparent. Existing development will not be affected, as the requirements are very similar to those currently in place for the EEPCO. Existing development would be able to amend their existing PDs to comply with the new regulations or utilize their vested rights under new Goal 166. See discussion of this Goal on Page 18.

Four of the other Community Plan Areas reference an average or limitation on FAR in specific areas, but these are the first FARs to apply broadly to development in a Future Land Use Category within Lee County. FAR provides development predictability by establishing a parcel-specific development size, which is an important condition for comprehensive planning under the Florida Statutes. **FARs are a percentage of the total land area that dictates the total potential square footage of a development. This means they provide the maximum possible total building size without considering other development requirements.** For example, a 1-acre parcel with an allowed FAR of 1.0 would be permitted to develop up to 43,560 square feet. The Land Development Code requirements will further limit building size in order to accommodate parking, setbacks, buffers, open space, stormwater management, maximum building height, and conservation requirements. It is very unlikely that a project would be able to use the entire FAR allowance. Typically, in Lee County, suburban development has an FAR between 0.20 and 0.30, resulting in approximately 10,000 square feet of development per acre. Rural development typically has an FAR of 0.15 or below, resulting in between 5,000 and 10,000 square feet of development per acre. **The proposed 0.25 FAR puts the potential development in this area of the county right between typical rural and suburban development, which, along with the LDC site requirements for parking, buffers, open space, and stormwater management, will help support the conservation and preservation efforts in Southeast Lee.** Note that Preservation and Innovation and Conservation Community have been added to the definitions for Future Non-Urban Areas (Conservation Community) and Future Suburban Areas (Preservation and Innovation).

The new Preservation and Innovation category allows a maximum FAR of 0.25, meaning the total development size cannot exceed 25% of the site's total acreage. This category is intended to support nonresidential development, meaning office, light industrial, and commercial uses, which typically have a larger footprint than residential development. Southeast Lee County is still intended to protect and restore the county's water resources and wildlife habitat. **The FAR and the requirements in the Land Development Code work together to achieve this goal by directly controlling the size of individual developments and limiting the building footprint through the other development standards, yielding more open space for wildlife habitat and water recharge.** This approach avoids the issue with Policy 33.2.5, which sets a fixed limit on total nonresidential development square footage in the Community Plan Area.

The new Conservation Community category also allows a very low FAR for nonresidential and multifamily development, but only when developed alongside low-density residential development. The inclusion of these uses within predominantly single-family conservation communities is intended to provide amenities, jobs, and housing options beyond detached single-family homes, better supporting multi-generational neighborhoods and mixed-income housing in one area, thereby reducing vehicular trip lengths and conserving more open space, particularly when developed in vertically mixed structures. Allowing multifamily development, which could include townhouses, condos, quadplexes, or other residential development types that do not qualify for a non-commercial building permit, within the FAR limitations is intended to discourage conversion of these lands to Live Local projects, which may not need to meet all of the environmental requirements for Southeast Lee. By allowing the use outright, there is less incentive for developers to use Live Local instead of the county's standard allowances. **In this category, the allowable FAR for nonresidential and multifamily development is separate from the maximum of 1.15 units per acre in the residential portion of the development, but the combined maximum is 0.15 FAR, calculated based on the nonresidential and multifamily acreage.**

RESIDENTIAL DEVELOPMENT

Currently, in Southeast Lee, the maximum standard density is 1 unit per 10 acres in the DR/GR future land use category, and may be increased to 1.15 units per acre when the property is designated on Map 1-D as a special development area or an Environmental Enhancement and Preservation Community Overlay (EEPCO) Tier 1 property. The other EEPCO Tiers also allow density increases, but at a lesser rate. The Lee Plan does not currently provide clear guidance on how to change tiers or what separates one tier from another. Additionally, the existing overlays are overly complicated and confusing for property owners.

Objective 33.2 currently describes the Southeast Lee County overlays, even though it is entitled "Residential and Mixed-Use Development." This Objective is significantly changed in the proposed amendments to house the Residential Use policies and to strike all existing overlay details in Policies 33.2.2, 33.2.3, and 33.2.4. The new Objective and supporting Policies are reproduced below.

> **OBJECTIVE 33.2: RESIDENTIAL ~~AND MIXED USE~~ DEVELOPMENT.** Residential development in Southeast Lee County must create, improve, preserve, and/or restore strategic surface and groundwater resources and indigenous wildlife habitats. ~~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).~~
>
> > **POLICY 33.2.1:** Residential development exceeding 1 unit per 10 acres within the Southeast Lee County Community Plan Area must have a future land use designation of Conservation Community and provide hydrological connections to regional watersheds, wildlife habitat connections to publicly or privately owned conservation lands, or strategic infrastructure connections to benefit the county's water and natural resources. Communities approved prior to DATE through a settlement agreement are exempt from this requirement under Lee Plan Chapter 13. ~~Existing acreage subdivisions are shown on Map 2-D. These subdivisions should be protected from adverse external impacts.~~
> >
> > **POLICY 33.2.2:** The County will create a program to allow a maximum density of 1.15 units per acre for the Conservation Community future land use category in the land development code to offset the costs of improving, preserving, and restoring regional surface and groundwater resources and wildlife habitat for state- and federally listed species.
> >
> > **POLICY 33.2.3:** Density in the Southeast Lee County Community Plan Area may not exceed 1.15 units per acre, regardless of land use category, even when the strategies in the land development code are met.
> >
> > **POLICY 33.2.4:** Existing acreage subdivisions, as indicated in the Lee Plan Map 1-D, should be protected from adverse external impacts through appropriate mitigation measures such as, but not limited to, site configuration, setbacks, density distribution, buffers, and/or general design.

The proposed changes convert the existing Environmental Enhancement and Preservation Community Overlays into the new Conservation Community Future Land Use Category. **The new category has been developed to align with the existing EEPCO**, the most widely used of these overlays. The creation of the new Future Land Use Categories and the removal of existing overlays streamline implementation and reduce the number of unnecessary or confusing overlays. The removal of the overlays and addition of the new Future Land Use Categories required map amendments in addition to the text amendments.

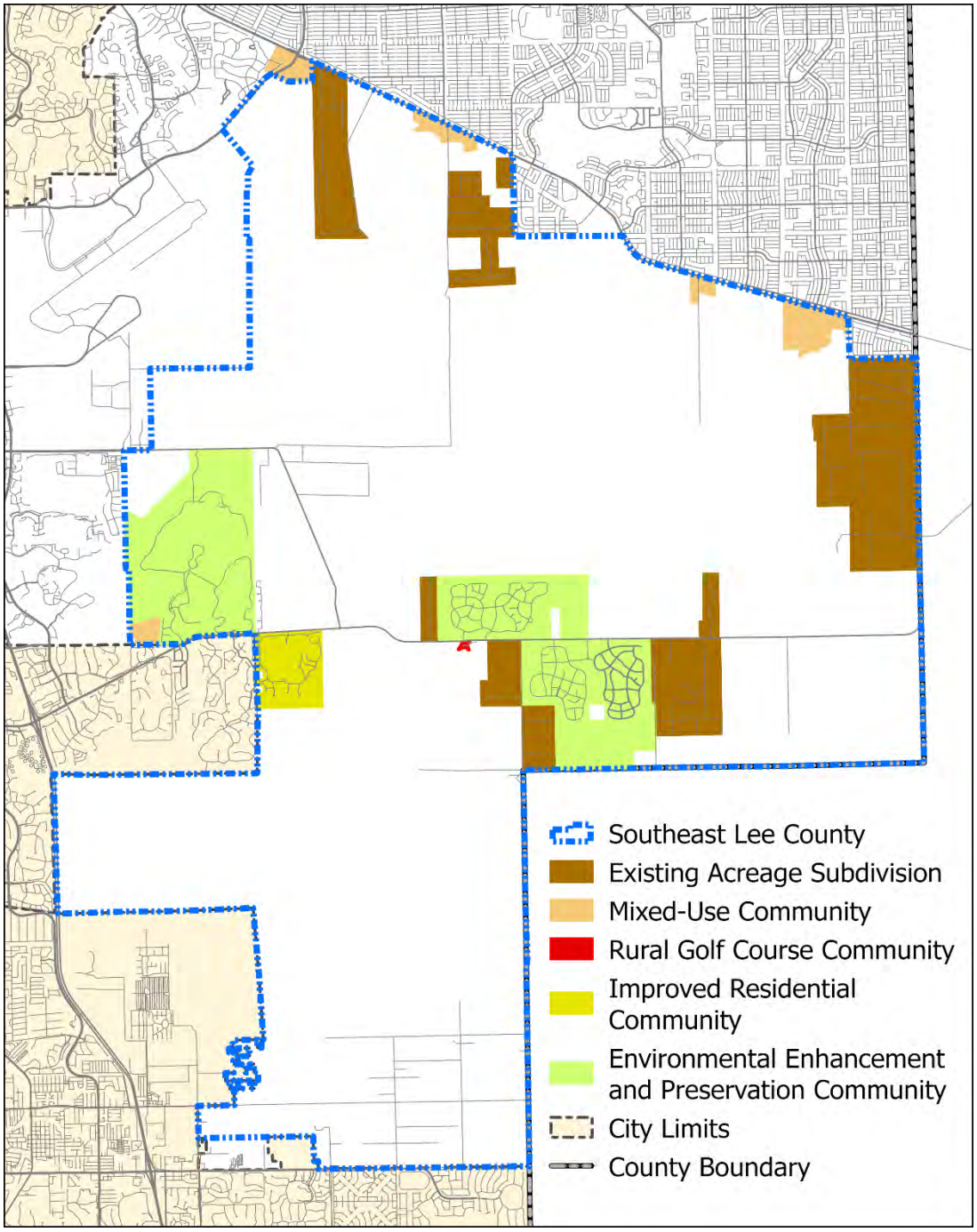


Figure 5: Existing Map 2-D, Southeast Lee Overlays

The Appendix maps and tables need to be updated to remove maps with existing overlays that have been condensed into the new categories, and to map areas with the new, most appropriate category. Figure 5 on page 15 shows the existing Map 2-D. The existing Acreage Subdivision and Rural Golf Course Community layers have been moved to Map 1-D, as shown in Figure 6 below. The Improved Residential Community and the Mixed-Use Community will be deleted and addressed in the property rights element, and the EEPCO overlay has been replaced with the Conservation Community land use category, as shown in Figure 7 below.

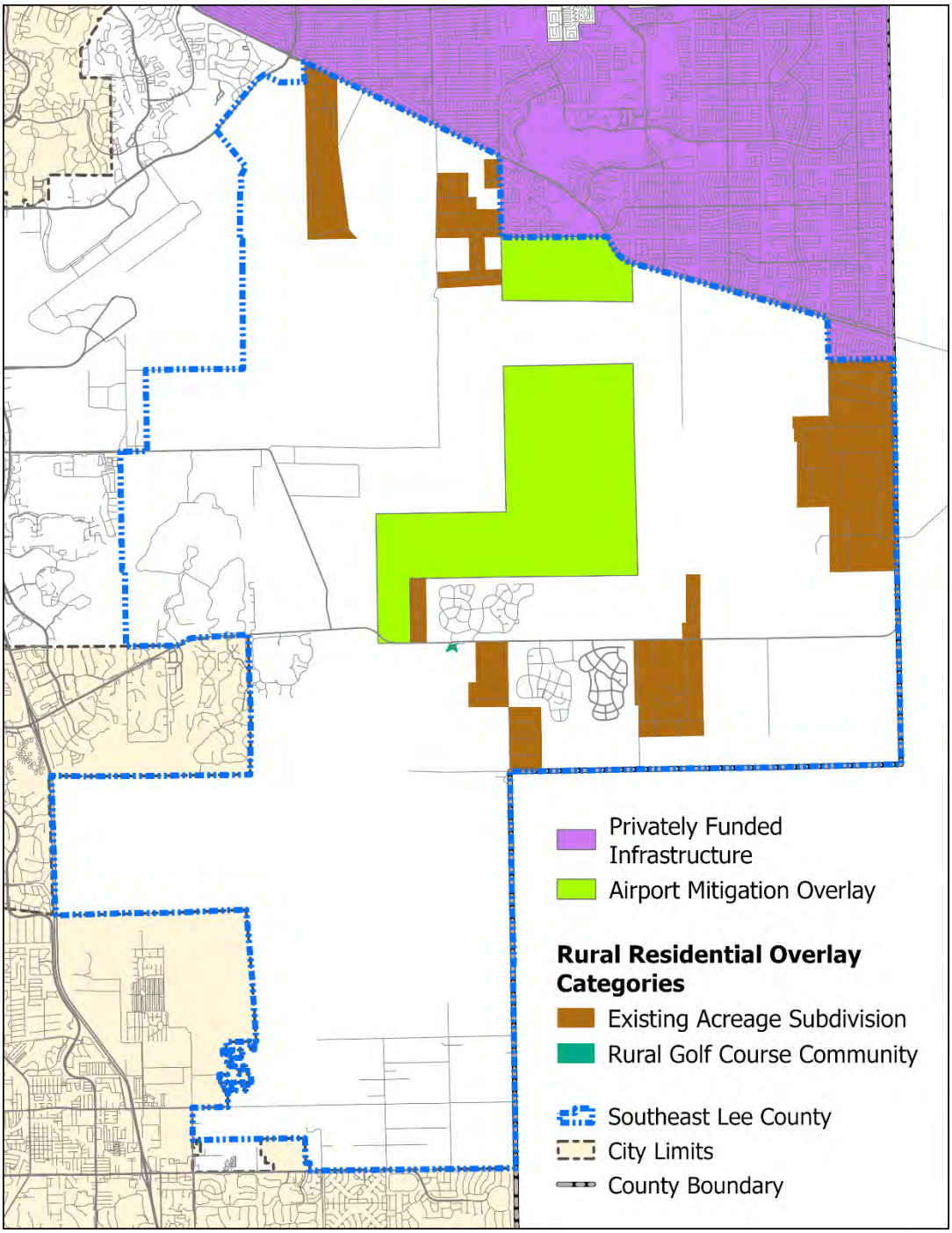


Figure 6: Proposed Map 1-D in Southeast Lee

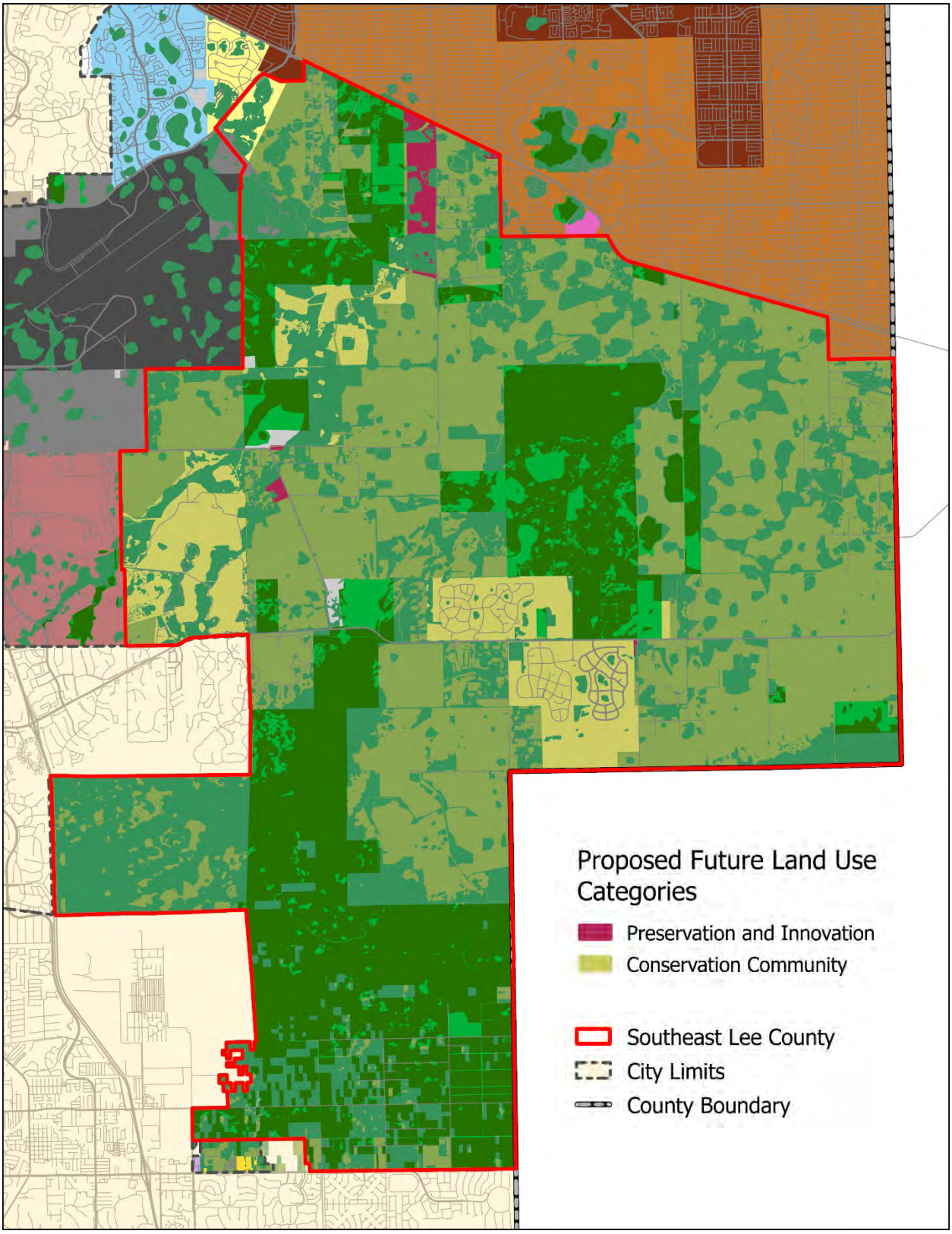


Figure 7: Future Land Use Map in Southeast Lee

The existing land use rights in areas where the county is changing the use category must be vested to ensure that the amendments do not violate F.S. 252.422 (SB 180) or impact the property owner's private property rights.

XII. Property Rights Element

GOAL 165: In accordance with §163.3177(6)(i), Fla. Stat., the following rights will be considered in local decision-making:

1. The right of a property owner to physically possess and control his or her interests in the property, including easements, leases, or mineral rights.
2. The right of a property owner to use, maintain, develop, and improve his or her property for personal use or for the use of any other person, subject to state law and local ordinances.
3. The right of the property owner to privacy and to exclude others from the property to protect the owner's possessions and property.
4. The right of a property owner to dispose of his or her property through sale or gift.

GOAL 166: County-initiated amendments may be made from time to time to update the Lee Plan, Future Land Use Map, or other regulatory documents to further the County's long-term vision for development.

OBJECTIVE 166.1: In certain instances where a county-initiated map or text amendment to the Lee Plan, Land Development Code, or zoning map changes the allowances on a property, the previous density and use allowances may be utilized in lieu of the changes.

POLICY 166.1.1: Properties previously identified as Mixed Use Community, Improved Residential Community, or Rural Golf Course Community in the Southeast Lee County Community Plan area may choose to develop under the regulations in effect prior to DATE by ORDINANCE, including requirements to concentrate development rights through the Southeast Lee County TDU program.

POLICY 166.1.2: Properties in the Southeast Lee County Community Plan Area whose land use was changed from DR/GR to Preservation and Innovation future land use category may retain the use and density allowances effective prior to DATE of Ordinance, in lieu of the Preservation and Innovation allowances. However, in no instance shall the density exceed 1 unit per 10 acres.

The existing rights of these properties were added to the Private Property Rights Element of the Lee Plan. This element previously contained only the required language from the Florida Statutes, but has been amended to include two goals: the required language and new language regarding county-initiated amendments. This location seemed more appropriate than keeping these amendments in Goal 33, as the new Goal 166 broadly covers County-initiated amendments, making it a central place to house future changes directly related to private property rights.

The last major change related to Objective 33.2 was the removal of all planned development requirements for Southeast Lee County from the Lee Plan. Originally, the proposed amendments to Southeast Lee County were fully contained within the Lee Plan. However, this Lee Plan Amendment has a companion LDC amendment that moves all implementing requirements for development in the Southeast Lee County Community Plan Area from the Lee Plan to the LDC. The PD requirements will, appropriately, move to the Land Development Code. **The Lee Plan still establishes the long-term vision for Southeast Lee, including development caps and general policies related to environmental preservation, but the implementing**

language has been moved to a new article that specifically addresses development within the Southeast Lee County Community Plan Area in the Land Development Code. The Land Development Code amendments are in a separate companion amendment that will follow the required LDC amendment process.

SUPPORTING AMENDMENTS

The nonresidential and residential amendments in Southeast Lee County necessitated changes elsewhere in the Lee Plan. Most of the amendments in this section are cleanup related to the amendments described above, with three exceptions: Policies 1.1.10, 1.1.13, and 7.1.2, whose changes resulted from the process of creating the main amendments.

As stated in the nonresidential section above, a new nonresidential category was created instead of trying to make the existing future land use categories work in Southeast Lee. Originally, the amendments were going to use the Commercial and Tradeport categories with additional protections for Southeast Lee. Staff reviewed the description of those categories as part of the original effort to make them work in Southeast Lee, and realized that general amendments were needed to help clarify and update the descriptions.

> **POLICY 1.1.10:** The **Commercial** future land use category is located in areas where infrastructure is planned or in place and residential uses are not expected or incompatible due to surrounding land uses, environmental constraints, or proximity to the Coastal High Hazard Area. ~~the nature of surrounding land uses, location along major travel corridors, or where residential development would increase densities in Coastal High Hazard Areas or in Lehigh Acres, where residential uses are abundant and existing commercial areas serving the residential needs are limited. In these locations, the requisite infrastructure needed for commercial development is generally planned or in place.~~ The Commercial category is intended to support all types of commercial uses and limited light industrial uses, excluding outdoor storage.~~retail developments, hotels and motels, banks, all types of office development, research and development, public, and other similar development will be predominant in the Commercial future land use category. Limited light industrial uses are also permitted, excluding outdoor storage type uses.~~ Residential uses, other than bona fide caretaker residences, are not permitted in this future land use category. ~~Any redesignation of land to the Commercial future land use category should occur along major travel corridors and at road intersections. The planned development rezoning process must be used to prevent adverse impacts to the surrounding areas and to ensure that appropriate site development regulations are incorporated into the development plans of each site. New developments~~Development in this category must connect to a potable water and sanitary sewer system.

The amendments to the Commercial future land use category simplify the description and remove the requirement of a planned development. Planned developments work well in areas with environmental constraints or unique circumstances, but they can complicate redevelopment. The Commercial category is intended to accommodate a variety of commercial uses and should align with conventional commercial zoning districts without requiring a PD for all development. The additional requirement of a planned development for all properties with a Commercial land use adds unnecessary steps to the development process.

The amendments to the Tradeport description specify that properties adjacent to Southwest Florida International Airport (RSW) or the Florida Strategic Intermodal System (freight highways) are best suited for this category, remove an outdated reference to Development of Regional Impact (DRIs), and clarify when commercial uses are permitted.

> **POLICY 1.1.13:** The **Tradeport** future land use category includes areas of commercial and industrial lands adjacent to the Southwest Florida International Airport (RSW),~~the airport~~ or other major transportation infrastructure such as Florida's Strategic Intermodal System (SIS). These areas will include developments consisting of light manufacturing or assembly, data centers, warehousing, and distribution facilities; research and development activities; laboratories; ground transportation and airport-related terminals or transfer facilities; hotels/motels, meeting facilities; education and training facilities; and office uses.
>
> Stand-alone retail commercial uses intended to support and complement the surrounding business and industrial land uses are permitted if they are approved as part of a ~~Development of Regional Impact (DRI) or~~ Planned Development rezoning. Stand-alone retail commercial uses are limited to 1 acre ~~out of~~for every 10 Tradeport and preserved wetland acres within the project. To provide an incentive to preserve upland habitat, ~~DRIs or~~ Planned Developments may also receive additional stand-alone retail acres at the rate of 1 additional acre ~~out of~~for every 10 acres of preserved and enhanced uplands within the project that protect wetlands, flow-ways, or occupied listed species habitat. Ancillary ~~retail~~ commercial uses related directly to the sale of products manufactured or services provided by the associated light industrial use are not considered stand-alone commercial ~~in Tradeport are allowed if they are part of a planned development~~. Residential uses, other than bona fide caretaker residences, are not permitted in this future land use category.

The changes to the Tradeport description clarify or update existing language; no substantive changes were made.

Similar to the change in the Commercial land use description, Policy 7.1.2 requires PDs for almost all industrial developments, including some within future land use categories that explicitly support industrial uses.

> **POLICY 7.1.2:** Industrial development is encouraged through conventional zoning districts when the property is within the Industrial Development, Tradeport, and Industrial Interchange future land use categories or within a Future Urban Area, unless a Planned Development is specifically required by the Lee Plan or necessary to demonstrate compliance with Policy 5.1.5. ~~Industrial in these future land use categories requiring rezoning and meeting DCI thresholds must be rezoned to a Planned Development. All rezonings to allow industrial uses outside of the Industrial Development, Tradeport, or Industrial Interchange future land use categories must be rezoned to a Planned Development, except if located within the Mixed Use Overlay. The Planned Development must be designed to arrange uses as an integrated and cohesive unit in order to: promote compatibility and screening; reduce dependence on the automobile; promote pedestrian movement within the development; utilize joint parking, access and loading facilities; avoid negative impacts on surrounding land uses and traffic circulation; protect natural~~

~~resources; and, provide necessary facilities and services where they are inadequate to serve the proposed use.~~

The proposed amendment to Policy 7.1.2 simplifies the policy and specifies that PDs are only necessary if specifically required by the Lee Plan or there are compatibility concerns with adjacent residential uses. The Land Development Code may need to be updated to ensure consistency with Planned Development requirements.

The remainder of the amendments directly relate to the Community Plan Area amendments for residential and nonresidential uses.

Policy 1.4.5 provides a description of the DR/GR future land use category. The proposed amendments clean up the language in #1 and remove the reference to the density increases in the Southeast Lee County Community Plan Area in #2.

> **POLICY 1.4.5:** The **Density Reduction/Groundwater Resource (DR/GR)** future land use category includes upland areas that provide substantial recharge to aquifers most suitable for future wellfield development. These areas ~~also are~~are also the most favorable locations for physical withdrawal of water from those aquifers.
>
> 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 utilizing hydrologic modeling.~~ The impacts of proposed development on the historic surface and groundwater resources must be analyzed using hydrologic modeling to assess potential adverse impacts to upstream and downstream lands, current and future water resources, and natural systems. This analysis will occur during the rezoning application process or development order application review, if rezoning is not required. The analysis must demonstrate that the proposed change will have no significant impacts on present or future water resources. Lee County's Department of Natural Resources will review and verify all proposed analyses, which may include an integrated surface and groundwater hydrologic model. The intent of the analysis is to demonstrate the impact of a proposed development on the county's natural resources. ~~the incorporation of increased storage capacity and~~ the ~~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 must be submitted as part of the rezoning application and updated, if necessary, as part of the ~~mining~~ development order application.
>
> 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 standard density of one dwelling unit per ten acres (1 du/10 acres). ~~See Objectives 33.2 and 33.3 for potential density adjustments resulting from concentration or transfer of development rights.~~
>
> 3. Private Recreational Facilities may be permitted in accordance with the site locational requirements and design standards, as further defined in Goal 13. No Private Recreational Facilities may occur within the DR/GR land use category

without a rezoning to an appropriate Planned Development zoning category, and compliance with the Private Recreation Facilities performance standards, contained in Goal 13.

The amendments to #1 clarify the requirements and keep the language consistent throughout the Lee Plan, but do not change the modeling requirements. Removing the reference to Objectives in Goal 33 in #2 was necessary. Residential development exceeding 1 unit per 10 acres in Southeast Lee County will need to have a Conservation Community future land use. This section only applies to properties with DR/GR land use. DR/GR will no longer have density incentives, so this policy no longer applies.

Policy 33.1.7 mirrors the language in #1 above:

> **POLICY 33.1.7:** Impacts of proposed ~~land disturbances~~development on surface and groundwater resources ~~will~~must be analyzed using hydrologic modeling to assess potential adverse impacts to upstream and downstream lands, current and future water resources, and natural systems within Southeast Lee County. This analysis will occur during the rezoning application process or development order application review, if rezoning is not required. The analysis will be proportionate to the proposed impacts and use integrated surface and groundwater models ~~that utilize~~with site-specific data. Lee County's Department of Natural Resources will review and verify all proposed analysis, which may include an integrated surface and groundwater hydrologic model. The intent of the analysis is to demonstrate the impact of a proposed development on the county's natural resources. ~~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.~~

Policy 1.6.10 establishes the residential overlays in Southeast Lee. The proposed amendments remove all overlays except the Existing Acreage Subdivisions and the Rural Golf Course Community. This change keeps this policy consistent with the amendments to Goal 33.

> **POLICY 1.6.10:** Lee Plan Map 1-D, Special Treatment Areas, depicts areas of the county with specific requirements, including the following overlays: ~~The Southeast Lee County Residential Overlay (Map 2-D) is described in Objective 33.2. This Overlay affects only Southeast Lee County and identifies five types of land:~~
>
> 1. "Existing Acreage Subdivisions:" Existing rural residential subdivisions that should be protected from adverse external impacts ~~such as natural resource extraction~~.
> 2. "Rural Golf Course Communities:" Potential locations for the concentration of development rights on property zoned Private Recreational Facilities Planned Development ~~and located in the Southeast DR/GR area~~.
> 3. ~~"Mixed-Use Communities:" Locations where this concentration of development rights from large contiguous tracts within the DR/GR area that can be supplemented by transfer of development rights from non-contiguous tracts in the Southeast DR/GR area. See Objective 33.3 and following policies.~~
> 4. ~~"Improved Residential Communities:" Property with existing residential approvals that are inconsistent with the Southeast DR/GR area that could be improved environmentally.~~

~~5. "Environmental Enhancement and Preservation Communities:" Properties adjacent to Corkscrew and Alico Roads that have the potential to improve and restore important regional hydrological and wildlife connections.~~

Similar to Policy 1.6.10, the amendments to Policies 33.1.2 and 33.1.3, and Objective 33.3 remove references to the deleted overlays.

POLICY 33.1.2: The County will create development incentives to offset the cost of creating, preserving, or re-establishing natural systems in the Southeast Lee County Community Plan Area. The incentive programs may be updated from time to time based on the changing needs of this area of the county. ~~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.~~

POLICY 33.1.3: Pursue acquisition ~~(partial or full interest)~~ of land via public investment, land swaps, conservation easements, or donation of critical lands within Southeast Lee County to augment preservation lands to improve, restore, or create water resources, natural ecosystems, and wildlife connections through a planned development, Development Agreement approved by the Board of County Commissioners, or other legally binding agreement accepted by the County Attorney's Office. ~~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.~~

Objective 33.3 currently houses the TDR program details in Southeast Lee. Many of these were directly related to the overlay in which a property was located. This objective has been updated to remove the overlay references that no longer apply and to create a new Flooding Mitigation Lands Program similar to the TDR program.

OBJECTIVE 33.3: ~~SOUTHEAST LEE COUNTY TRANSFER OF DEVELOPMENT RIGHTS (Southeast Lee County TDR)~~LAND CONSERVATION PROGRAM~~S~~. To protect water resources and natural habitat of Southeast Lee County, Lee County establishes the Southeast Lee County Transferable Development Rights (TDR) and Flooding Mitigation programs. ~~may incorporate Southeast Lee County's purchase and transfer of development rights programs into the LDC.~~

POLICY 33.3.1 The ~~new~~ programs ~~may~~ create incentives for property owners or developers within Southeast Lee County to transfer development rights associated with ~~their~~ sending parcels to receiving lands outside the planning community.~~; or, residential areas identified on Map 2-D; Southeast DR/GR Residential Overlay as specified in Policy 33.3.2.~~

POLICY 33.3.2: The Southeast Lee County TDR program will have the following characteristics:

1. Creation of Transferable Development Units (Southeast Lee County TDUs).
   a. Up to one Southeast Lee County TDU may be created per five acres of preserved or indigenous wetlands.
   b. Up to two Southeast Lee County TDUs may be created from a single-family lot or parcel designated as wetlands that holds an affirmative Minimum Use Determination pursuant to Chapter XIII.
   c. Southeast Lee County TDU credits may be established from DR/GR designated lands as follows:
      1) Up to one Southeast Lee County TDU may be created for each ten upland acres encumbered by an agricultural easement.
      2) Up to one Southeast Lee County TDU may be created for each 5 upland acres with indigenous native or restored native vegetation encumbered by a conservation easement.
      ~~3) For each Southeast Lee County TDU credit allowed by c.1) or c.2) above, up to two extra TDU credits may be created if the sending area land is designated as Tier 1, Tier 2, Tier 3, or the southerly two miles of Tiers 5, 6, and 7 in the Priority Restoration Strategy (Map 1-D).~~
2. Receiving area density and intensity equivalents of Southeast Lee County TDUs.
   a. ~~In Mixed-Use Communities in Southeast Lee County identified on Map 2-D, each Southeast Lee County TDU credit may be redeemed for a maximum of one dwelling unit plus a maximum of 800 square feet of non-residential floor area.~~
   ~~b. In Improved Residential Communities in Southeast Lee County identified on Map 2-D, each Southeast Lee County TDU credit may be redeemed for a maximum of one dwelling unit.~~
   ~~c. In Rural Golf Course Communities in Southeast Lee County identified on Map 2-D, each Southeast Lee County TDU credit may be redeemed for a maximum of one dwelling unit or two bed and breakfast bedrooms.~~
   ~~d. In Environmental Enhancement and Preservation~~ Properties within the Conservation Community ~~Communities~~ future land use category may redeem ~~identified on Map 2-D, each~~ Southeast Lee County TDU credits ~~may be redeemed~~ for a maximum of one dwelling unit per 10 acres ~~using~~when the credits are from DR/GR sending areas and a maximum of one dwelling unit per 20 acres ~~using~~ when credits are from wetland sending areas.
   ~~e~~b. No more than 2,000 dwelling units may be placed on receiving parcels within the Southeast Lee County Community Plan Area~~identified in subsections a. through d. above using the Southeast Lee County TDR program~~.
   ~~f~~c. Properties outside of the Southeast Lee County Community Plan area with ~~In the~~ Intensive Development, Central Urban, Urban Community, or General Interchange future land use ~~categories outside of Southeast Lee County, each Southeast Lee County TDU~~ may ~~be~~ redeem~~ed~~ Southeast Lee County TDUs

for up to two dwelling units an acre. Southeast Lee County TDUs may not be redeemed for non-residential floor area in these future urban areas.

3. The LDC may include regulations that permit the County to evaluate the effectiveness of the Southeast Lee County TDR program and make changes that may further condition or restrict the use of Southeast Lee County TDUs.

POLICY 33.3.3: The County will administer the TDR program and develop a forum to disseminate program information and records. The forum may include a TDR program website that provides general program information, rules and guidelines; TDU administrative determination application; County-approved form of conservation easement; certified TDU database with ownership information; and, TDU clearinghouse for individuals that request to be included within the TDU clearinghouse program.

POLICY 33.3.4: Southeast Lee County Flooding Mitigation Lands Program allows developers to purchase property in the Southeast Lee County Community Plan Area identified for county mitigation projects in exchange for development approvals. Purchased property must be approved and dedicated to the county. The Flooding Mitigation Lands Program will be allocated per the following:

1. For projects within the Southeast Lee County Community Plan Area, incentives will be provided per the thresholds described in the LDC.
2. For projects outside of the Southeast Lee County Community Plan Area:
    a. Additional density may be applied to the receiving site at a rate of 2 units per acre of purchased and transferred land. The maximum density may not exceed the Bonus Density allowances of the land use category.
    b. Open space at a 1-acre for every 5 acres of purchased and transferred land. No more than 25% of the required open space may be offset by this allowance.

The new Policy 33.3.4 facilitates a Public-Private Partnership for Flooding Mitigation Projects in Southeast Lee County by permitting private developers to purchase specific lands needed for county flooding projects and transfer them to the applicable entity in exchange for development credits. These parcels will be identified as "Public Acquisition" in a future update of Map 1-D, but they are already identified in the Department of Natural Resources' CREW Project Area map. Additionally, the policy's second part might allow properties outside Southeast Lee County to gain development credits for the acquisition of these lands within Southeast Lee. The intent is to help the County acquire property essential to flooding mitigation projects in exchange for development incentives.

Objective 2.3 provides the required findings for Future Land Use Map Amendments. The proposed language clarifies the existing requirements, adds the new categories to Policy 2.3.2, removes the finding requirements, and removes Policy 2.3.3, which no longer applies.

OBJECTIVE 2.3: FUTURE LAND USE MAP AMENDMENTS. To require formal findings for certain Future Land Use Map amendments.

POLICY 2.3.1: All proposed changes to the Future Land Use Map in critical areas for future potable water supply, such as ~~(~~Lehigh Acres, as described in Policy

54.1.9, and all land in the Southeast Lee County Community Plan Area or the DR/GR land use category.) Map amendments for these areas will be subject to a special review by the staff of Lee County. This review will to analyze the potential impact of the land change on the proposed land uses to and determine the short-term and long-term availability of irrigation and domestic water sources and will assess whether the proposed land useschange 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 within the Southeast Lee County Community Plan Area to a district other than Preservation and Innovation, Conservation Community, Wetlands, Conservation Lands, or Public Facilities will be discouraged by the County. 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.

POLICY 2.3.3: Lee Plan amendment applications to expand the Lee Plan's employment centers, which include light industrial, commercial retail and office land uses, will be evaluated by the Board of County Commissioners in light of the locations and cumulative totals already designated for such uses, including the 1994 addition of 1,400 acres to the Tradeport category just south of the Southwest Florida International Airport.

The proposed change to remove numbers 1 through 4 as required findings for map amendments in Southeast Lee reduces redundant policies. #1 and #2 state that properties would need to verify the availability of irrigation and domestic water resources. The LDC standards for all residential and nonresidential development in Southeast Lee require new development to connect to the central water and sewer system and to minimize irrigation needs. #3 states that all land use changes require data and analysis to ensure the proposed change will not adversely affect water quality or water resources. This is already a requirement in the proposed Policies 1.1.16, 1.4.5, 33.1.7, 33.2.1, and 33.4.1. #4 addresses urban sprawl. Lee Plan Goal 1 and Objective 2.1 already include language about containing and addressing urban sprawl. **The inclusion of these requirements in Policy 2.3.2 is unnecessary, as they are already required in other areas of the Lee Plan.**

Policy 6.1.2 is a supporting policy for Goal 6, which addresses all commercial development within the county. This is the second amendment to this policy this year. Previously, the policy included multiple bullet points that specified the areas to which it applied. The proposed amendment removes the bullet related to Southeast Lee County and changes the language to exempt only areas where the community plans specifically allow more intense commercial uses.

> **POLICY 6.1.2:** Commercial development in non-urban future land use categories is limited to Minor Commercial, ~~except that~~ unless the Lee Plan specifically provides otherwise.~~:~~
>
> - ~~Neighborhood Commercial uses are permitted in the Southeast Lee County Planning District as provided for in Objectives 13.3 and 33.2.5.~~
>
> Minor Commercial development may include limited commercial uses serving rural areas and agricultural needs, and commercial marinas. Minor Commercial development must be located so that the retail use, including buildings and outdoor sales area, is located at the intersection (within 330 feet of the adjoining rights-of-way of the intersecting roads) of arterial and collector roads or two collector roads with direct access to both intersecting roads. Direct access may be achieved with an internal access road to either intersecting road. On islands, without an intersecting network of collector and arterial roads, commercial development may be located at the intersection of local and collector, or local and arterial, or collector and collector roads.

As part of the proposed amendments, staff evaluated the boundaries of the Southeast Lee County Community Plan Area in response to one of the privately initiated amendment requests (CPA2025-00009) and input from one of the County Departments regarding property along Bonita Beach Road within Lee County's jurisdiction.

The proposed map amendments include a slight contraction of the Southeast Lee County Community Plan Area along Bonita Beach Road, south of the Kehl Canal, and a portion of a property along Daniels Parkway. These areas do not share the same water characteristics as the rest of Southeast Lee County and, therefore, should not be subject to the same requirements. The proposed contraction areas have been coordinated and confirmed with Lee County's Department of Natural Resources. The proposed contraction area has no impact on Table 1(b), as the Planning District, which is used for data tracking, will not change with the proposed contraction.

The last text amendments add definitions to the Glossary to support the other amendments and to fill existing gaps.

COMMERCIAL DEVELOPMENT -- A use involving, in whole or in part, the sale of merchandise, materials, or services. Commercial development may include retail, wholesaling, personal services, temporary accommodations, office, or other uses that involve the transfer or sale of goods or services.

MINOR – Commercial development that ~~provides for the sale of convenience goods and services and~~ contains less than 30,000 square feet of gross floor area.

NEIGHBORHOOD – Commercial development that ~~provides for the sale of convenience goods and personal services, such as food, drug, sundries, and hardware items and~~ has a gross floor area range of 30,000 to 100,000 square feet.

COMMUNITY – Commercial development that ~~provides for the sale of retail goods such as clothing, variety items, appliances, and furniture as well as goods that may be found in a neighborhood commercial development and~~ has a gross floor area range of 100,000 to 400,000 square feet.

REGIONAL – Commercial development ~~that provides some functions of community commercial, in addition to providing a full range and variety of shopping goods for comparative shopping (such as general merchandise, apparel, furniture, and home furnishings) and~~ has a gross floor area range of 400,000 to 1 million square feet.

DISCOURAGED – To dissuade or attempt to dissuade from doing something, but not to prohibit outright; an unwanted action, not a prohibited one.

ENCOURAGED – A wanted action, but not the only action that may be acceptable.

FUTURE NON-URBAN AREAS – Those categories on the Future Land Use Map that are designated primarily for single use developments with a density equal to or less than 1 unit per acre unless otherwise allowed within a special treatment area identified in Objective 1.7: Rural, Rural Community Preserve, Coastal Rural, Outer Island, Open Lands, Wetlands, Conservation Lands (upland and wetland), New Community within the North Olga Planning Community, Conservation Community, and Density Reduction/Groundwater Resource.

FUTURE SUBURBAN AREAS – Those future urban categories on the Future Land Use Map that are designated primarily for single use developments: Suburban, Outlying Suburban, Sub-Outlying Suburban, Industrial Development, Airport, Tradeport, Preservation and Innovation, Commercial, Industrial Interchange, General Commercial Interchange, Industrial Commercial Interchange, University Village Interchange, University Community, Public Facilities, and the New Community within the Gateway/Airport Planning Community.

INDUSTRIAL DEVELOPMENT – A business use or activity involving manufacturing, fabrication, assembly, warehousing, and/or storage.

INDUSTRIAL, HEAVY – Manufacturing, resource refinement or extraction, other enterprises with significant external effects, or enterprises that pose significant risks due to the involvement of explosives, radioactive materials, poisons, pesticides, herbicides, or other hazardous materials in manufacturing or other processes. The location of a use does not indicate whether it is considered heavy industrial. Heavy Industrial uses can be inside or outside a building.

INDUSTRIAL, LIGHT – A use that involves the manufacturing, production, processing, fabrication, testing, assembly, treatment, repair, packaging, or warehousing of finished products within a building, without a noticeable amount of noise, dust, odor, smoke, glare, or vibrations.

The proposed changes to commercial development remove specific uses from the list of commercial development types, but retain the size limitations currently in place. The previous definitions of commercial development across different types have essentially identified only retail uses; however, commercial development encompasses a wide range of uses, as the new definition covers.

Throughout the Lee Plan, there are policies that use the terminology "encourage" and "discourage," but until now, those terms have not been explicitly defined. The definitions encompass the current accepted use of the terms. This is not a change from the current interpretation; it is codifying the accepted practice.

The Lee Plan also lists "Light Industrial" as a permitted use in numerous Future Land Use Categories, but does not currently specify which industrial uses qualify as light industrial. The proposed amendment defines industrial uses and then divides them into Light and Heavy Industrial to provide clear guidance on which uses are appropriate in specific locations.

The proposed Glossary amendments may necessitate additional amendments to the Land Development Code to ensure consistency. Staff will include those with future LDC amendments.

All amendments, including those to the maps and tables in the appendix, are located in Attachment 1. All of these amendments support the text amendments described herein. Analysis of their consistency with the Lee Plan is provided in the Lee Plan Analysis section of this Staff Report.

LEE PLAN ANALYSIS

The comprehensive plan applies to all land use decisions within unincorporated Lee County. Where goals, objectives, standards, or policies of particular elements conflict, those conflicts will be resolved based on an analysis of the Lee Plan as a whole. The Lee Plan analysis included in this staff report outlines the proposed amendments in relation to the most applicable Lee Plan goals, objectives, and policies to determine their appropriateness.

Lee Plan Chapter 2, Part b, contains the county's Community Planning Goals within the Future Land Use Element. **Goal 17**, Community Planning, establishes the Community Plan Areas and their requirements. **Objective 17.1** states that community plans address specific conditions and long-term visions unique to that area of the county. This objective is supported by three policies. **Policy 17.1.1** states that the county will "Coordinate community plans with County-wide and regional plans with respect to population accommodation, transportation, employment, economic development, and infrastructure needs in an effort to avoid inconsistencies." The proposed amendments support a coordinated effort between the county, private developers, the public, and conservation groups to balance development pressure and changing conditions with conservation and preservation goals in Southeast Lee.

As mentioned in the Background section of this report, the last major update to Southeast Lee County was the addition of the EEPCO in 2015. Since that update, development in Southeast Lee County has changed significantly, with the development of Kingston (settlement agreement), which added 10,000 new residential units, and the Alico Extension, which connects Corkscrew Road to State Road 82 and

Sunshine Blvd, a major connector in Lehigh that is anticipated to connect to State Road 80 in the future. Properties along the Alico Extension that previously did not connect to the county's major road network now have a front-row seat to a controlled-access major connector road. **The proposed amendments provide updated development parameters to accommodate the approved infrastructure, residential development, and environmental concerns in Southeast Lee, consistent with Policies 17.1.1 and 17.1.2.**

One of the major changes in the proposed amendments is moving the PD requirements out of the Lee Plan and into the Land Development Code. **Policy 17.1.3** states, "Community plans should consist of long term objectives and policies that are not regulatory in nature. If needed, land development regulations may be adopted to implement the community plan." **The transfer of the development requirements for Southeast Lee County from the Lee Plan to the LDC is consistent with Policy 17.1.3.**

The existing Policy 17.2.1 states, "Each community plan area boundary must be rationally related to the condition(s) identified in the individual community plan." The proposed map amendments to the Southeast Lee County Community Plan Area Boundary are consistent with **Policy 17.2.1**, as the areas being removed from Southeast Lee County do not share the same hydrological characteristics as the remainder of the plan area. The Kehl Canal blocks the surface water connection between properties along Bonita Beach Road and the Imperial River Watershed and CREW Wildlife Management Area. The portion of the property on Daniels Parkway that the amendments propose removing from Southeast Lee County is located in the Six Mile/Estero River watershed, a different watershed than the remainder of Southeast Lee; additionally, its proximity to Southwest Florida International Airport (RSW) further distinguishes that land from the rest of the Community Plan Area. **These properties are not rationally related to the conditions identified in the Southeast Lee County Community Plan Area; therefore, the proposed contraction of the Southeast Lee County Community Plan Area is consistent with Policy 17.2.1.**

Objective 17.3 provides guidance on Public Input for comprehensive plan amendments within a community plan area. As described in the Public Outreach and Department Collaboration and the Procedural Requirements sections of this staff report, **the amendments have met all public outreach requirements of the Florida Statutes, Lee Plan, and the County's Administrative Code.**

Lee Plan Goal 33 contains the Southeast Lee County Community Plan Area's Objectives and Policies that guide development in this area of the county. Goal 33 states:

> **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 proposed amendments will continue to protect Southeast Lee County's water resources and wildlife habitat through strict development guidelines. The Conservation Community land use category, intended for residential and subordinate nonresidential uses, retained the EEPCO requirements, including, but not limited to, open space, habitat restoration, and hydrological connections. The Preservation and Innovation category requirements were also derived directly from the EEPCO requirements, with input from the County's Department of Natural Resources, Utilities Department, and Department of

Transportation, to ensure that new nonresidential uses couldn't negatively impact the County's water quality, infrastructure, or wildlife areas. **The new Future Land Use Categories are not inconsistent with the intent of Goal 33.**

The Dover-Kohl Study heavily influenced the creation of Goal 33, Restoration Tiers, and existing overlays in Southeast Lee. The study was intended to study Southeast Lee County to determine a way to limit population, which was a requirement of State Statutes at the time, discourage mining, and protect the County's water resources and wildlife habitat (i.e., Panther Habitat). The study stated that compact, mixed-use communities should be the standard in DR/GR. This idea influenced the creation of the existing residential overlays. The proposed Conservation Communities Future Land Use Category will replace the EEPCO and continue the idea of compact, mixed-use communities by requiring a large percentage of open space with clustered, low-density development, while also allowing a very small amount of nonresidential and multifamily via the permitted FAR. The deletion of the existing overlays does not detract from Goal 33's consistency with the Dover-Kohl recommendations, as both new land use categories draw direct inspiration from the existing overlays. **The changes to the Southeast Lee County Overlays are consistent with the Dover-Kohl recommendations and the intent of Goal 33.**

Objective 33.1 states that the County will "Protect and restore natural resources within Southeast Lee County including, but not limited to, surface and ground water, wetlands, and wildlife habitat." This objective is supported by eight policies related to water, habitat, and other natural resources. The proposed amendments do not substantively change any of these requirements. Residential and nonresidential projects within the Southeast Lee County Community Plan Area will need to preserve, restore, or create areas for water resources, wildlife habitat, wetlands, and flowway connections. Additionally, development the new Conservation Community and Preservation and Innovation categories will need to connect to public utilities, including reuse if it becomes available, which will also help protect the county's water resources in the area. **The proposed amendments are not inconsistent with Objective 33.1 or the intent of any of its policies.**

Lee Plan Goal 2 provides direction on Growth Management. The overarching Goal states that the County will provide an "economically feasible plan which coordinates the location and timing of new development with the provision of infrastructure by government agencies, private utilities, and other sources." In addition to the proposed Alico Extension project, the Kingston development will be constructing water and sewer infrastructure along Corkscrew Road to extend Lee County Utilities. The proposed county-initiated map amendments to incorporate the new land use categories into the Future Land Use Map will change the future land use categories of properties that have submitted map amendment applications to the appropriate new category and incorporate them into the Lee County Utilities Service Area Maps. All of the privately initiated map amendments have provided service availability letters from the applicable service providers. The proposed map amendments include a couple of properties that have not submitted an application. These amendments either fix an existing inconsistency between the zoning and future land use category or incorporate property along the new Alico Extension. All of the properties have, or will have upon development, access to public water and sewer infrastructure with adequate capacity to serve, public roads, EMS, and fire protection. **Per the letters of no objection attached to the staff report, no county departments have raised any concerns regarding the capacity to serve the properties associated with the proposed map amendments, consistent with Lee Plan Goal 2.**

Policy 2.3.2 includes four required findings for Future Land Use Map Amendments in DR/GR:

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.*

As previously stated, county water and sewer connections will be required for all development in Southeast Lee. The proposed text amendments will ensure that irrigation sources will not negatively impact the county's water resources. **The proposed map amendments are consistent with #1 and #2.** All properties included in the map changes that are not currently developed will require a planned development rezone, in which the applicant must demonstrate that the proposed uses and development will not cause significant harm to present or future water resources. The new land use categories have been designed to minimize the impact of development on water resources and the environment. **The proposed map amendments are consistent with #3.** All the proposed map amendments are on existing or proposed major roads, will be required to connect to public utilities, and are located between existing developments, meaning they will fill in gaps between existing sprawl. **The proposed map amendments are not creating urban sprawl, consistent with #4.**

Two of the proposed map amendments are located along State Road 82, adjacent to Lehigh Acres. Both of those amendments are proposed as Preservation and Innovation, which supports nonresidential uses. The Lehigh Acres Commercial Land Use Study, written by Spikowski Planning Associates, dated May 1996, states,

> *About 2% of the land in Lehigh Acres currently has commercial zoning, far less than the typical 5% commercial allocation for an entire community. Even if all of this zoned land were actually available and usable for commercial development, it would provide only enough space for about 38% of the build-out population of Lehigh Acres. An even greater problem, though, is that much of the remaining commercially zoned land suffers from serious flaws. Two of these flaws are:*
>
> - *Premature platting of excellent commercial sites into single-family lots, which were sold off to individual buyers, many with deed restrictions against commercial uses.*
> - *Provision of commercial land as shallow commercial strips, sold off into individual parcels in the same manner as single-family lots.*

The County has been trying to alleviate the shortage of commercial space in Lehigh for decades. As the Spikowski study states, two major flaws are the lack of appropriate locations for commercial development due to scattered residential development along major thoroughfares and the lack of adequately sized parcels to support it. Southeast Lee County has both of these in very close proximity to Lehigh. Another Lehigh Acres study, entitled "Lehigh Acres Comprehensive Planning Study," dated 2009, estimated the total number of parcels in Lehigh at 125,855, covering approximately 96 square miles, with a deficit of commercial land at 558 acres and industrial land at 444 acres. **While the proposed amendments would**

not be located within the Lehigh Acres Community Plan Area, the proposed map amendments to support nonresidential uses along State Road 82 and Daniels Parkway directly support the Lehigh Acres Community Plan Area Objectives 25.1 and 25.3, and Policies 25.3.2 and 25.4.1.

A portion of Southeast Lee County is subject to the Everglades West Coast Basin Management Action Plan (BMAP). Under state statute FS 163.3177, as amended by HB 1379 in 2023, local governments must consider how to extend utilities to residential development exceeding one (1) unit per acre in a BMAP. The proposed text amendments allow for a maximum of 1.15 units per acre, but require all new residential and nonresidential development to connect to public utilities. **The proposed incorporation of the properties associated with the privately-initiated amendments into the LCU Future Water Service Area (Map 4-A) and LCU Future Sewer Service Area (Map 4-B) is consistent with state statutes regarding utility expansion within a BMAP and Lee Plan Objective 4.1.**

Goals 53, Potable Water Infrastructure, and 56, Sanitary Sewer Infrastructure, state:

> ***GOAL 53: POTABLE WATER INFRASTRUCTURE****. Provide high-quality central potable water service throughout Lee County. Ensure that the costs of providing facilities is borne by those who benefit from them.*
>
> ***GOAL 56: SANITARY SEWER INFRASTRUCTURE****. In partnership with franchised/certificated utilities providers, provide sanitary sewer service and wastewater treatment and disposal throughout Lee County.*

Each developer would be financially responsible for extending the line outside of where the line is already proposed for expansion or connecting to the line when it becomes available. **Policy 53.1.1** states that the LCU service area is illustrated in Map 4-A, and **Policy 56.1.1** states that sewer service areas are indicated on Map 4-B. **Lee County Utilities provided a letter of no objection to the proposed amendments on DATE. All of the individual developments will need to show capacity availability at the time of rezone and Development Order.**

Lee Plan Goal 123 contains the County's goals for Resource Protection. This goal states,

> ***GOAL 123: RESOURCE PROTECTION.*** *Manage coastal, wetland and upland ecosystems and natural resources in order to maintain and enhance native habitats, floral and faunal species diversity, water quality, and natural surface water characteristics.*

Development in both new land use categories requires preservation, creation, or restoration of upland, wetland, and wildlife habitats, **consistent with Policies 123.1.1, 123.1.5, 123.1.7, 123.2.4, 123.2.7, 123.2.8, 123.2.15, 123.3.1, and 123.4.3**. Both new districts also incorporate the creation of Wildfire Mitigation plans with their planned developments, **consistent with Policy 123.1.8**. The amendments to Policy 1.4.5 and 33.1.7 maintain the existing requirements for water modeling for all changes in land use categories. Policy 33.1.3, as amended, expands conservation measures to public and private entities, **consistent with Policy 123.1.2**. The Conservation Community designation maintains the required open space and environmental requirements that the existing EEPCO uses. Preservation and Innovation allows nonresidential uses only when an applicant can demonstrate the proposed use category will not harm the environment, provide adequate open space, and preserve and restore habitat, **consistent with Policy 123.2.2**. **The proposed text amendments are consistent with the broad goal of Goal 123.**

Lee Plan **Goal 124** contains the County's goals for Wetlands. This goal states,

> **GOAL 124: WETLANDS.** To maintain and enforce a regulatory program for development in wetlands that is cost-effective, complements federal and state permitting processes, and protects the fragile ecological characteristics of wetland systems.
>
> > **OBJECTIVE 124.1:** Protect and conserve the natural functions of wetlands and wetland systems by maintaining wetland protection regulations.

The proposed changes do not impact the regulations for wetlands as they apply to State Permits or general development standards in the County; however, the proposed amendments do strengthen them in Southeast Lee, particularly as they relate to nonresidential uses, which are not currently allowed based on the existing 300,000 square foot limitation for commercial uses. Currently, nonresidential uses throughout the county have no incentives to maintain wetlands on a property. The proposed Land Development Code amendments, which implement the Preservation and Innovation land use category, require that all connected wetlands be protected and conserved as part of the required open space. **The proposed amendments are consistent with Goal 124 and Objective 124.1.**

Lee Plan **Goals 125** and **126** contain the County's goals related to Water Quality and Water Resources. The proposed amendments have been extensively reviewed by Lee County's Departments of Natural Resources and Utilities to ensure adequate protection of the County's water resources for utility purposes and natural resources for general water quality and flow. The new density incentives in the Land Development Code for Conservation Community and the standard requirements for Preservation and Innovation increase the stormwater requirement to a 100-year, 24-hour event. This exceeds the standard stormwater requirement and should provide additional stormwater capacity in these developments. The proposed amendments still require water quality and quantity analysis during the development stages and long-term monitoring after development, **consistent with Goal 125, Objective 125.1, and Policies 125.1.1, 125.1.2, and 125.1.3**. As stated previously, all potential development resulting from these amendments will also be required to connect to central utilities, **consistent with 125.1.5.** The proposed Preservation and Innovation category limits uses to those that can demonstrate they will not adversely affect the County's water resources or water quality, with confirmation from the Department of Natural Resources prior to development, **consistent with Objective 126.1 and its supporting policies.**

Lee Plan **Objective 126.2** states that the County will promote Florida-Friendly Landscaping. The proposed amendments for residential development carry over the requirement for native landscaping from the EEPCO and provide an incentive for drip irrigation to minimize water use and ensure the longevity of the landscaping. Because the nonresidential requirements are new and apply to a use that is not currently allowed, the LDC standards require native landscaping and drip irrigation for all nonresidential developments. Both amendments are **consistent with Policies 126.2.1 and 126.2.3**.

Lee Plan **Chapter 11** is the Economic Element. One of the major reasons for the proposed text amendments was to support the development of nonresidential uses in Southeast Lee County to support employment opportunities and amenities for residents in Southeast Lee County and the surrounding communities. **Goal 158** states that the County will, "Achieve and maintain a diversified and stable economy by providing a positive business climate that assures maximum employments." There are very few places left in the county with parcels large enough to support business and industrial parks, particularly in close proximity to RSW, SR 82, and the adjacent counties. The proposed amendments help

foster a diversified economy by allowing nonresidential uses in Southeast Lee, **consistent with Goal 158, Objective 158.2, and policy 158.2.1 and 158.2.2.**

Objective 158.3 states that the County will "Ensure businesses have access to infrastructure and services needed to be competitive in a global economy." This Objective is supported by four policies relating to transportation infrastructure, economic development related to the Port Authority, the State's Strategic Intermodal System (SIS), and expansion of communication technology. The proposed amendments allow for nonresidential uses along arterial and collector roads, including SR 82 and Interstate 75, which are part of the SIS. Additionally, Southeast Lee County is adjacent to RSW, making it a natural expansion for airport-related businesses. **The proposed amendments allow nonresidential uses in an area of the County that currently cannot have any additional nonresidential uses and are therefore consistent with Objective 158.3 and Policies 158.3.1, 158.3.2, and 158.3.3.** New development along these corridors will help to expand access to broadband communications and infrastructure, **consistent with Policy 158.3.4.**

Lee Plan Chapter 12 contained the Property Rights Element. The proposed amendments add language to this element, but the existing language is important to consider. The existing element is reproduced below.

> *In accordance with §163.3177(6)(i), Fla. Stat., the following rights will be considered in local decision making:*
>
> 1. *The right of a property owner to physically possess and control his or her interests in the property, including easements, leases, or mineral rights.*
>
> 2. *The right of a property owner to use, maintain, develop, and improve his or her property for personal use or for the use of any other person, subject to state law and local ordinances.*
>
> 3. *The right of the property owner to privacy and to exclude others from the property to protect the owner's possessions and property.*
>
> 4. *The right of a property owner to dispose of his or her property through sale or gift*

The proposed amendments do not impede a property owner's ability to physically possess and control their property interests. The proposed amendments expand the potential uses of property, subject to approval of a Future Land Use Map Amendment, which may provide some additional uses and allowances for property owners in Southeast Lee. The amendments also include existing provisions to protect single-family, large-lot subdivisions. Additionally, new language has been added to this section to grant vested rights to existing developments in Southeast Lee County that have changed Future Land Use Category or Overlay with the proposed amendments. The amendments will not affect a property owner's right to privacy or to exclude others from their property, nor will they affect a property owner's right to dispose of their property. **The proposed amendments do not conflict with the requirements of Chapter 12.**

CONCLUSIONS

Staff has reviewed the proposed amendments and provides the following conclusions:

- The proposed amendments provide updated development parameters to accommodate the approved infrastructure, residential development, and environmental concerns in Southeast Lee County.
- No county departments have raised any concerns regarding the capacity to serve the properties associated with the proposed map amendments, consistent with Lee Plan Goal 2.
- Staff held numerous meetings with applicants, the public, and County departments to solicit feedback on the proposed amendments.
- The proposed amendments provide adequate protection for the County's water resources and wildlife habitat.
- The proposed amendments are consistent with the BoCC direction from April 1, 2025, and April 21, 2026.
- None of the amendments are in conflict with Senate Bill 180, as they expand use allowances and existing property rights are formally vested.

For the reasons discussed in this staff report, staff recommends that the Board of County Commissioners ***adopt*** the proposed amendment as shown in Attachment 1.

PART 2
LOCAL PLANNING AGENCY
REVIEW AND RECOMMENDATION

DATE OF PUBLIC HEARING: July 27, 2026

A. LOCAL PLANNING AGENCY REVIEW

Staff provided a detailed presentation of the proposed text and map amendments, addressing planning rationale, impacts, and consistency with the Lee Plan.

Members of the LPA first thanked staff for the effort that went into the proposed amendments and then inquired about the intent of some terminology, clarification on the need for a Development Agreement in addition to Planned Developments, clarification on the applicability of Conservation Communities in other places in the County, and some recommended additions to Goal 165.

Thirteen members of the public spoke on the proposed amendments. One additional member of the public submitted a comment card but chose not to speak. Comments included concern regarding the speed at which the amendments were made, the implications of the proposed amendments on water quality, additional requests from the privately-initiated amendments' applicants, acknowledgement of staff's efforts, changing conditions in Southeast Lee requiring these amendments, additional FAR allowances for industrial development, the positive impact of the proposed amendments on the Lehigh Acres Community, the positive impact of adding nonresidential uses to reduce trip and add jobs, concern over wildlife habitat, concern about density incentives, the changing statutory requirements for comprehensive planning, the general compatibility of the amendments with the natural resources in Southeast Lee, concern that the new allowances will create more development demand, and concern that these amendments will start to apply to other places in the County.

LPA then asked staff additional questions in response to the public comments and their own understanding of the amendments.

B. LOCAL PLANNING AGENCY RECOMMENDATION

A motion was made to recommend that the Board of County Commissioners (BoCC) ***transmit CPA2026-00004,*** remove additional areas of the Daniels Tradeport property from Southeast Lee, include the Freeman property, clarify the terms "adequate protection" and "alongside", and add language to Goal 165. The motion passed 4 to 0.

DUSTIN GARDNER	AYE
DAWN RUSSELL	ABSENT
JENNIFER SAPEN	AYE
DON SCHROTENBOER	AYE
STAN STOUDER	AYE
HENRY ZUBA	ABSENT
VACANT SEAT	-

C. RESPONSE TO LPA MOTION

This section addresses the additional items the LPA added to their motion.

1. ***Daniels Tradeport to be fully removed from Southeast Lee.*** The LPA recommended that the Daniels Tradeport Property (CPA2025-00009) be removed from the Southeast Lee County planning area.

   The Daniels Tradeport property has an existing mix of Tradeport and Wetlands future land uses and was originally located entirely within the Southeast Lee Community Plan Area. The first version of the Southeast Lee contraction removed approximately 163.23 acres of the subject property from Southeast Lee, leaving 5.6 acres within Southeast Lee, essentially maintaining the Southeast Lee boundary along the Estero River Watershed. The LPA requested that the remainder of the Tradeport portion of the property be removed from Southeast Lee.

   According to Policy 17.2.1, the community plan area boundary must be rationally related to the conditions of the community plan area. The Southeast Lee Community Plan Area is comprised of the Estero River and Imperial River Watersheds, which have defined the planning area boundaries in the past.[2] Community Plan Area boundaries may be defined by more than environmental characteristics. Future Land Use Map designations, property ownership, site access, and legal considerations such as existing property rights are also important factors in determining the rational connection of a property to a Community Plan Area.

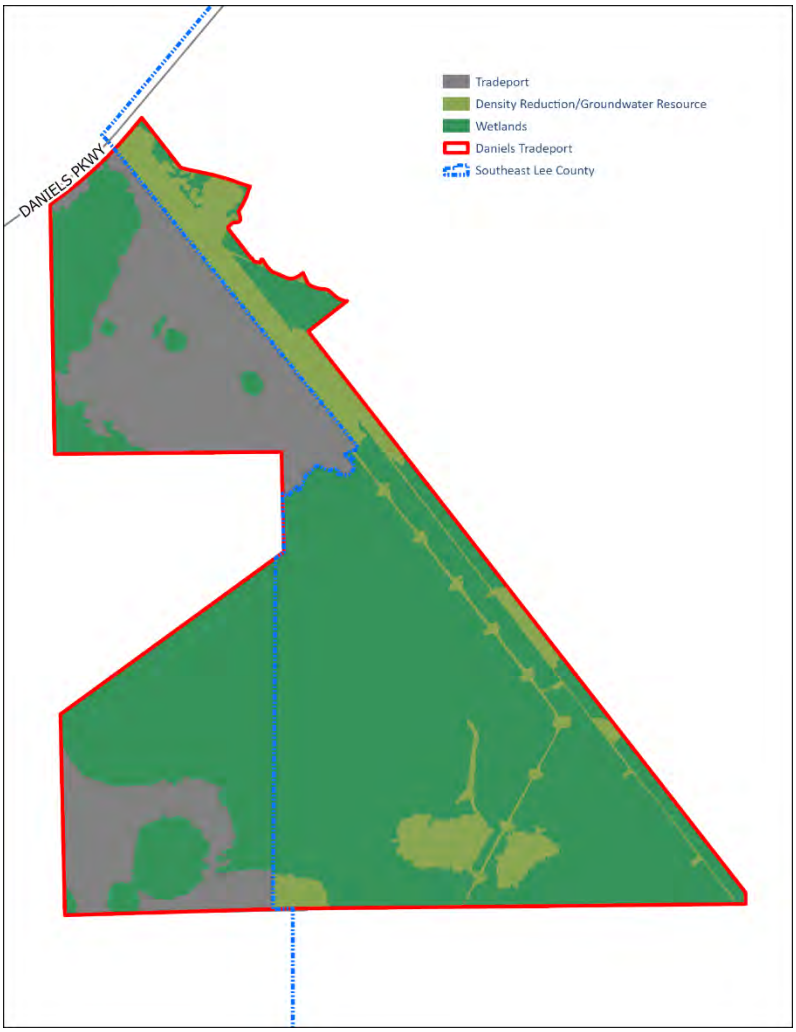
   

   Figure 8: Proposed Daniels Tradeport & Southeast Lee Boundary

   The lands targeted for removal in the LPA motion are currently designated as Tradeport land within the Southeast Lee County Community Plan Area. These lands are situated within the 10,000-foot hazardous wildlife buffer outlined in Policy 47.2.5 and are directly at the runway's

[2] CPA2016-00007, Timber Creek; CPA2021-00017/CPA2021-00018, Daniels Parkway South

end. They are also owned by the same entity as other lands staff has recommended removing from Southeast Lee County, based on only the watershed boundary considerations.

Given the practical implications of splitting developable portions of the property across Community Plan Areas and the legal concerns of having conflicting land use regulations rendering a portion of the proper unusable, staff agrees with the LPA motion and recommends revising the Community Plan Area boundary along the jurisdictional wetland line to ensure the lands most likely to be developed are subject to uniform development requirements, consistent with the LPA recommendation, as shown in Figure 8. The relatively small area of developable land within the Estero River Watershed can be addressed through the design of the proposed development and the required water management permit (ERP).

Staff supports the LPA recommendation to remove the Tradeport portion of the subject property from the Southeast Lee Community Plan Area.

2. ***Inclusion of the Freeman Property (CPA2025-00011) as Preservation and Innovation***

At the hearing, the applicant requested that the LPA include the Freeman 82 property in the proposed amendments in the motion to recommend transmittal. The property was included in one of the original drafts of the proposed amendments for nonresidential uses, based on its comprehensive plan amendment application. Staff removed the property from the proposed amendments after the applicants expressed interest in a different type of development than what was originally proposed in their application.

Following the hearing, staff reviewed the data previously provided for CPA2025-00011 and requested a narrative from the applicant to confirm that anticipated development would be consistent with the proposed future land use category. The applicant is proposing a mixture of nonresidential uses, connections to Lee County Utilities for both potable water and sanitary sewer services, and preservation of a large contiguous wetland area in the southern portion of the Property. Including the Future Land Use Map amendment for the Freeman 82 property would not approve the proposed development. Approval of the proposed development would require continued review through the Planned Development rezoning process in order to demonstrate consistency with the Preservation and Innovation future land use category and the remainder of the Lee Plan.

Staff supports the inclusion of this property in the proposed amendments as Preservation and Innovation, as shown in the updated Future Land Use Map changes that are included in Attachment 1.

3. **Clarification of Terms: "alongside" and "adequate protection"**

The proposed language for Policy 1.4.8 specifies that nonresidential and multifamily uses may be permitted when they are developed alongside low-density residential uses. The intent with this statement was to allow these uses when they are purposefully developed in the same Planned Development (PD) as the low-density residential areas. The updated language is shown in the policy below:

> **POLICY 1.4.8:** The **Conservation Community** future land use category denotes areas of low-density, clustered residential and mixed-use development within the Southeast Lee

County Community Plan Area. Development in this category must connect to a potable water and sanitary sewer system. This category requires a large percentage of open space and the restoration of environmentally sensitive lands to protect the County's water resources and Southeast Lee County's natural resources. The standard density is 1 unit per 10 acres, with a maximum density of 1.15 units per acre when the community is designed as a planned development in accordance with the Land Development Code. Development in this category is encouraged to promote a park-like aesthetic, with pedestrian connections and extensive green spaces. Nonresidential and multifamily uses may be allowed when developed ~~alongside~~ within the same planned development as low-density residential uses. These uses are limited to a maximum total FAR of 0.15, based on the acreage allocated to non-residential and multi-family uses. A traditional Main Street design with vertically mixed buildings, adjacent to park space, is encouraged for developments that utilize the FAR allowance; standalone linear commercial development is discouraged.

Staff recommends changing the proposed language to clarify the intent as represented above.

The second term the LPA suggested clarifying was "adequate protection"; this phrase does not appear in the proposed amendments and was included only in the staff presentation. Many policies in the new Southeast Lee amendments, the proposed and existing requirements for conversion from DR/GR future land use, and other elements of the Lee Plan require the protection of the County's natural resources. No policy can fully protect all natural systems and habitats; however, the proposed amendments provide checks and balances to protect the County's natural resources and wildlife habitats to the greatest extent possible through policies related to required hydrological modeling, analysis of the impacts of specific uses, required preservation areas, and very low-density, low-intensity development.

No changes required relating to "adequate protections."

4. Goal 165

The LPA suggested expanding the language in #4 of Goal 165 to include other legal conveyances of property that are not sales or gifts. The existing language was derived from the required language in the state statute. The statute required every jurisdiction to include the private property rights element and the required language; however, jurisdictions may elaborate on or add to the required language in the statute.

GOAL 165: In accordance with §163.3177(6)(i), Fla. Stat., the following rights will be considered in local decision-making:

a. The right of a property owner to physically possess and control his or her interests in the property, including easements, leases, or mineral rights.
b. The right of a property owner to use, maintain, develop, and improve his or her property for personal use or for the use of any other person, subject to state law and local ordinances.
c. The right of the property owner to privacy and to exclude others from the property to protect the owner's possessions and property.
d. The right of a property owner to dispose of his or her property through sale, ~~or~~ gift, or other legal conveyance.

Staff supports adding the proposed language to broaden the statement to apply to all legal transfer of land and finds no conflict with the inclusion in state law.

D. ADDITIONAL CHANGES

This section of the staff report addresses additional changes needed to the proposed amendments that have been identified since the staff report for the LPA was published. All changes in this section were discussed during the LPA hearing. ***Staff supports the changes included in this section.***

1. Clarification that DR/GR uses are not required to meet the requirements of the new future land use categories

The Conservation Community and Preservation and Innovation categories were intended for residential and nonresidential uses that are not currently allowed in the DR/GR within Southeast Lee County. Development that is consistent with the DR/GR future land use category, such as resource extraction or other uses identified in Policy 2.1.3, may continue to be developed within the DR/GR, consistent with the Lee Plan. To clarify that, new language has been added to the respective policies based on feedback gained from the public. Both of these changes were discussed by staff at the LPA hearing.

> **OBJECTIVE 33.2: RESIDENTIAL ~~AND MIXED USE~~ DEVELOPMENT.** Residential development in Southeast Lee County in a land use category other than DR/GR and exceeding 1 unit per 10 acres must create, improve, preserve, and/or restore strategic surface and groundwater resources and indigenous wildlife habitats. ~~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).~~
>
> **OBJECTIVE 33.4: NONRESIDENTIAL USES.** Livability in Southeast Lee County requires the allowance of nonresidential uses in addition to the uses allowed in the DR/GR to provide employment opportunities and reduce the number and duration of vehicle trips. Due to the potential environmental impacts of certain nonresidential uses, limitations are required to protect the County's water resources and safeguard natural resources. Similar to residential development in Southeast Lee County, nonresidential development must create, improve, preserve, and/or restore strategic surface and groundwater resources and indigenous wildlife habitats while balancing the need for commercial, industrial, and office uses to support the existing and anticipated surrounding residential development.

In addition, staff also proposes editing Objective 33.2 to strike the word strategic, as it does not add definable value to the statement.

2. Table 1(a) Note 13

Table 1(a), Note 13, references Southeast Lee policies that will no longer exist if the proposed amendments are adopted. In the table, Note 13 appears as a DR/GR footnote. The proposed amendments previously included a new Note 20 that clarifies how density is calculated in the new Conservation Community land use category. The revised amendments will reuse footnote 13 for

Conservation Community instead of Note 20 and remove the existing language containing outdated Goal 33 references. An excerpt of the table with the proposed revisions is shown below.

FUTURE LAND USE CATEGORY	STANDARD OR BASE DENSITY RANGE		BONUS DENSITY
Conservation Community[13]	No Minimum	1.15	No Bonus
Density Reduction/Groundwater Resource[13]	No Minimum	1 du/10 acres	No Bonus

[13] ~~See Objectives 33.2 and 33.3 for potential density adjustments.~~ The maximum density in the Conservation Community future land use category is 1.15, inclusive of wetlands located within project boundaries (see Policies 1.4.8 and 33.2.2).

E. STAFF RECOMMENDATION

Staff recommends that the BoCC ***transmit*** the proposed amendment as provided in the revised Attachment 1, according to the edits above.

ATTACHMENT 1

- **Text Amendments**

- **Map Amendments**
  - **Map 1-A: Existing Future Land Use Map**
  - **Map 1-A: Proposed Future Land Use Map**
  - **Map 1-D: Existing Special Treatment Areas**
  - **Map 1-D: Proposed Special Treatment Areas**
  - **Map 2-A: Community Planning Areas**
  - **Map 2-D: Southeast DR/GR Residential Overlay**
  - **Map 4-A: LCU Future Water Service Area**
  - **Map 4-B: LCU Future Sewer Service Area**

- **Table Amendments**
  - **Table 1(a) Summary of Residential Densities**

POLICY 1.1.10: The **Commercial** future land use category is located in areas where infrastructure is planned or in place and residential uses are not expected or incompatible due to surrounding land uses, environmental constraints, or proximity to the Coastal High Hazard Area. ~~the nature of surrounding land uses, location along major travel corridors, or where residential development would increase densities in Coastal High Hazard Areas or in Lehigh Acres, where residential uses are abundant and existing commercial areas serving the residential needs are limited. In these locations, the requisite infrastructure needed for commercial development is generally planned or in place.~~ The Commercial category is intended to support all types of commercial uses and limited light industrial uses, excluding outdoor storage.~~retail developments, hotels and motels, banks, all types of office development, research and development, public, and other similar development will be predominant in the Commercial future land use category. Limited light industrial uses are also permitted, excluding outdoor storage type uses.~~ Residential uses, other than bona fide caretaker residences, are not permitted in this future land use category. ~~Any redesignation of land to the Commercial future land use category should occur along major travel corridors and at road intersections. The planned development rezoning process must be used to prevent adverse impacts to the surrounding areas and to ensure that appropriate site development regulations are incorporated into the development plans of each site. New developments~~Development in this category must connect to a potable water and sanitary sewer system.

- Simplifies description: Streamlines the Commercial future land use category.
- Removes PD requirement: Eliminates mandatory planned developments for commercial projects in the Commercial future land use category.
- Accelerates approvals: Removes unnecessary steps to speed up redevelopment.

POLICY 1.1.13: The **Tradeport** future land use category includes areas of commercial and industrial lands adjacent to the Southwest Florida International Airport (RSW),~~the airport~~ or other major transportation infrastructure such as Florida's Strategic Intermodal System (SIS). These areas will include developments consisting of light manufacturing or assembly, data centers, warehousing, and distribution facilities; research and development activities; laboratories; ground transportation and airport-related terminals or transfer facilities; hotels/motels, meeting facilities; education and training facilities; and office uses.

Stand-alone retail commercial uses intended to support and complement the surrounding business and industrial land uses are permitted if they are approved as part of a ~~Development of Regional Impact (DRI) or~~ Planned Development rezoning. Stand-alone retail commercial uses are limited to 1 acre ~~out of~~for every 10 Tradeport and preserved wetland acres within the project. To provide an incentive to preserve upland habitat, ~~DRIs or~~ Planned Developments may also receive additional stand-alone retail acres at the rate of 1 additional acre ~~out of~~for every 10 acres of preserved and enhanced uplands within the project that protect wetlands, flow-ways, or occupied listed species habitat. Ancillary ~~retail~~ commercial uses related directly to the sale of products manufactured or services provided by the associated light industrial use are not considered stand-alone commercial

~~in Tradeport are allowed if they are part of a planned development~~. Residential uses, other than bona fide caretaker residences, are not permitted in this future land use category.

- Specifies relation to RSW airport, not airports generally, and freight highways.
- Removes outdated requirements: Deletes obsolete references to Developments of Regional Impact (DRIs).
- Clarifies land use: Explicitly defines when commercial activities are allowed.

POLICY 1.1.16: The **Preservation and Innovation** future land use category is connected to central utilities and located along arterial or major collector roadways in the Southeast Lee County Community Plan Area, with the intent of balancing ecological, hydrological, and wildlife preservation with employment and commercial needs within the County. Office, light industrial, and commercial uses are encouraged when designed to preserve or restore surrounding natural resources. This category requires a large percentage of open space and the restoration of environmentally sensitive lands to protect the County's water resources and Southeast Lee County's natural resources. Uses that have a significant impact on ground and surface water levels or quality, are known producers or users of noxious gases or chemicals, or have other detrimental impacts on the natural environment, as demonstrated by appropriate data and analysis and verified by the County, may not be permitted. This land use category does not permit general residential uses. Caretaker's residences and dormitory-type accommodations for employees or individuals associated with the business may be permitted as part of the Floor Area Ratio (FAR) calculation when accessory to a nonresidential use. Development in this category is limited to an FAR of 0.25 and is encouraged to promote a park-like aesthetic, with pedestrian connections, extensive green spaces, and minimal linear commercial centers. Applications for rezoning must follow the planned development rezoning process in accordance with the Land Development Code.

- New land use category that allows nonresidential uses.

POLICY 1.4.5: The **Density Reduction/Groundwater Resource (DR/GR)** future land use category includes upland areas that provide substantial recharge to aquifers most suitable for future wellfield development. These areas ~~also are~~are also the most favorable locations for physical withdrawal of water from those aquifers.

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 utilizing hydrologic modeling.~~ The impacts of proposed development on the historic surface and groundwater resources must be analyzed using hydrologic modeling to assess potential adverse impacts to upstream and downstream lands, current and future water resources, and natural systems This analysis will occur during the rezoning application process or development order application review, if rezoning is not required. The analysis must demonstrate that the proposed change will have no significant impacts on present or future water resources. Lee County's Department of Natural Resources will review and verify all proposed analyses, which may include an integrated surface and groundwater hydrologic model. The intent of the analysis is to demonstrate the impact of a

proposed development on the county's natural resources. ~~the incorporation of increased storage capacity and the 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 must be submitted as part of the rezoning application and updated, if necessary, as part of the ~~mining~~ development order application.

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 standard density of one dwelling unit per ten acres (1 du/10 acres). ~~See Objectives 33.2 and 33.3 for potential density adjustments resulting from concentration or transfer of development rights.~~

3. Private Recreational Facilities may be permitted in accordance with the site locational requirements and design standards, as further defined in Goal 13. No Private Recreational Facilities may occur within the DR/GR land use category without a rezoning to an appropriate Planned Development zoning category, and compliance with the Private Recreation Facilities performance standards, contained in Goal 13.

- Clarifies requirements and standardizes language across the Lee Plan without altering existing requirements.
- Removes reference to Objectives within Goal 33 which no longer apply.

POLICY 1.4.8: The **Conservation Community** future land use category denotes areas of low-density, clustered residential and mixed-use development within the Southeast Lee County Community Plan Area. Development in this category must connect to a potable water and sanitary sewer system. This category requires a large percentage of open space and the restoration of environmentally sensitive lands to protect the County's water resources and Southeast Lee County's natural resources. The standard density is 1 unit per 10 acres, with a maximum density of 1.15 units per acre when the community is designed as a planned development in accordance with the Land Development Code. Development in this category is encouraged to promote a park-like aesthetic, with pedestrian connections and extensive green spaces. Nonresidential and multifamily uses may be allowed when developed ~~alongside~~ within the same planned development as low-density residential uses. These uses are limited to a maximum total FAR of 0.15, based on the acreage allocated to non-residential and multi-family uses. A traditional Main Street design with vertically mixed buildings, adjacent to park space, is encouraged for developments that utilize the FAR allowance; standalone linear commercial development is discouraged.

- New residential land use category for Southeast Lee, modeled after the EEPCO.
- Added clarification following the LPA hearing to clarify what was meant by "alongside", as requested in the LPA recommendation.

POLICY 1.6.10: Lee Plan Map 1-D, Special Treatment Areas, depicts areas of the county with specific requirements, including the following overlays: ~~The Southeast Lee County Residential Overlay (Map 2-D) is described in Objective 33.2. This Overlay affects only Southeast Lee County and identifies five types of land:~~

1. "Existing Acreage Subdivisions:" Existing rural residential subdivisions that should be protected from adverse external impacts ~~such as natural resource extraction~~.
2. "Rural Golf Course Communities:" Potential locations for the concentration of development rights on property zoned Private Recreational Facilities Planned Development ~~and located in the Southeast DR/GR area~~.
3. ~~"Mixed-Use Communities:" Locations where this concentration of development rights from large contiguous tracts within the DR/GR area that can be supplemented by transfer of development rights from non-contiguous tracts in the Southeast DR/GR area. See Objective 33.3 and following policies.~~
4. ~~"Improved Residential Communities:" Property with existing residential approvals that are inconsistent with the Southeast DR/GR area that could be improved environmentally.~~
5. ~~"Environmental Enhancement and Preservation Communities:" Properties adjacent to Corkscrew and Alico Roads that have the potential to improve and restore important regional hydrological and wildlife connections.~~

- Edits related to the inclusion of the new future land use categories and deletion or relocation of existing overlays.

OBJECTIVE 2.3: FUTURE LAND USE MAP AMENDMENTS. To require formal findings for certain Future Land Use Map amendments.

POLICY 2.3.1: All proposed changes to the Future Land Use Map in critical areas for future potable water supply, such as ~~(~~Lehigh Acres, as described in Policy 54.1.9, and all land in the Southeast Lee County Community Plan Area or the DR/GR land use category.~~)~~ Map amendments for these areas will be subject to a special review by the staff of Lee County. ~~This review will~~ to analyze the potential impact of the land change on the ~~proposed land uses to and determine the short-term and long-term~~ availability of irrigation and domestic water sources and ~~will~~ assess whether the proposed ~~land uses~~change 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 within the Southeast Lee County Community Plan Area to a district other than Preservation and Innovation , Conservation Community, Wetlands, Conservation Lands, or Public Facilities will be discouraged by the County. ~~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.~~

~~**POLICY 2.3.3**: Lee Plan amendment applications to expand the Lee Plan's employment centers, which include light industrial, commercial retail and office land uses, will be evaluated by the Board of County Commissioners in light of the locations and cumulative totals already designated for such uses, including the 1994 addition of 1,400 acres to the Tradeport category just south of the Southwest Florida International Airport.~~

- Standardizes Lee Plan language: Clarifies requirements and updates text for consistency across the Lee Plan without altering requirements.
- Removes outdated incentives: Eliminates DR/GR density incentives and requires a Conservation Community designation for residential development in Southeast Lee County.

POLICY 6.1.2: Commercial development in non-urban future land use categories is limited to Minor Commercial, ~~except that~~ unless the Lee Plan specifically provides otherwise.~~:~~

- ~~Neighborhood Commercial uses are permitted in the Southeast Lee County Planning District as provided for in Objectives 13.3 and 33.2.5.~~

Minor Commercial development may include limited commercial uses serving rural areas and agricultural needs, and commercial marinas. Minor Commercial development must be located so

that the retail use, including buildings and outdoor sales area, is located at the intersection (within 330 feet of the adjoining rights-of-way of the intersecting roads) of arterial and collector roads or two collector roads with direct access to both intersecting roads. Direct access may be achieved with an internal access road to either intersecting road. On islands, without an intersecting network of collector and arterial roads, commercial development may be located at the intersection of local and collector, or local and arterial, or collector and collector roads.

- Removes outdated references.

POLICY 7.1.2: Industrial development is encouraged through conventional zoning districts when the property is within the Industrial Development, Tradeport, and Industrial Interchange future land use categories or within a Future Urban Area, unless a Planned Development is specifically required by the Lee Plan or necessary to demonstrate compliance with Policy 5.1.5. ~~Industrial in these future land use categories requiring rezoning and meeting DCI thresholds must be rezoned to a Planned Development. All rezonings to allow industrial uses outside of the Industrial Development, Tradeport, or Industrial Interchange future land use categories must be rezoned to a Planned Development, except if located within the Mixed Use Overlay. The Planned Development must be designed to arrange uses as an integrated and cohesive unit in order to: promote compatibility and screening; reduce dependence on the automobile; promote pedestrian movement within the development; utilize joint parking, access and loading facilities; avoid negative impacts on surrounding land uses and traffic circulation; protect natural resources; and, provide necessary facilities and services where they are inadequate to serve the proposed use.~~

- The proposed amendment to Policy 7.1.2 simplifies the policy and specifies that PDs are only necessary if specifically required by the Lee Plan or there are compatibility concerns with adjacent residential uses.

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.~~ A variety of uses may be permitted when developed in accordance with the goals, objectives, and policies in the Lee Plan, the Wellfield Protection Ordinance, Land Development Code, and other applicable environmental protection requirements.

- Expands the allowed uses in Southeast Lee.

POLICY 33.1.2: The County will create development incentives to offset the cost of creating, preserving, or re-establishing natural systems in the Southeast Lee County Community Plan Area. The incentive programs may be updated from time to time based on the changing needs of this area of the county. ~~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.~~

POLICY 33.1.3: Pursue acquisition ~~(partial or full interest)~~ of land via public investment, land swaps, conservation easements, or donation of critical lands within Southeast Lee County to augment preservation lands to improve, restore, or create water resources, natural ecosystems, and wildlife connections through a planned development, Development Agreement approved by the Board of County Commissioners, or other legally binding agreement accepted by the County Attorney's Office. ~~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.~~

- Remove references to deleted overlays.

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).~~

POLICY 33.1.7: Impacts of proposed ~~land disturbances~~development on surface and groundwater resources ~~will~~must be analyzed using hydrologic modeling to assess potential adverse impacts to upstream and downstream lands, current and future water resources, and natural systems within Southeast Lee County. This analysis will occur during the rezoning application process or development order application review, if rezoning is not required. The analysis will be

proportionate to the proposed impacts and use integrated surface and groundwater models ~~that utilize~~with site-specific data. Lee County's Department of Natural Resources will review and verify all models to evaluate their design and outputs, ensuring the protection of the county's natural resources. ~~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.~~

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~~ protects and restores natural systems within Southeast Lee County.

- Clarifies requirements and standardizes language across the Lee Plan without altering existing modeling requirements.
- Remove references to deleted overlays.

OBJECTIVE 33.2: RESIDENTIAL ~~AND MIXED USE~~ DEVELOPMENT. Residential development in Southeast Lee County in a land use category other than DR/GR and exceeding 1 unit per 10 acres must create, improve, preserve, and/or restore strategic surface and groundwater resources and indigenous wildlife habitats. ~~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).~~

- Added language to clarify that residential densities of 1 unit per 10 acres can still be achieved within the DR/GR future land use category.

POLICY 33.2.1: Residential development exceeding 1 unit per 10 acres within the Southeast Lee Community Plan Area must have a future land use designation of Conservation Community and provide hydrological connections to regional watersheds, wildlife habitat connections to publicly or privately owned conservation lands, or strategic infrastructure connections to benefit the county's water and natural resources. Communities approved prior to DATE through a settlement agreement are exempt from this requirement under Lee Plan Chapter 13. ~~Existing acreage subdivisions are shown on Map 2-D. These subdivisions should be protected from adverse external impacts.~~

POLICY 33.2.2: The County will create a program to allow a maximum density of 1.15 units per acre for the Conservation Community future land use category in the land development code to offset the costs of improving, preserving, and restoring regional surface and groundwater resources and wildlife habitat for state- and federally listed species.

POLICY 33.2.3: Density in the Southeast Lee County Community Plan Area may not exceed 1.15 units per acre, regardless of land use category, even when the strategies in the land development code are met.

POLICY 33.2.4: Existing acreage subdivisions, as indicated in the Lee Plan Map 1-D, should be protected from adverse external impacts through appropriate mitigation measures such as, but not limited to, site configuration, setbacks, density distribution, buffers, and/or general design.

- This section is repurposed to reference residential development.

~~**POLICY 33.2.2:** Map 2-D identifies future locations for Mixed-Use Communities where development rights can be concentrated from large Southeast Lee County tracts. The preferred pattern for residential development is to cluster density within Mixed-Use Communities along existing roads and away from Future Limerock Mining areas.~~

~~1. Southeast Lee County Mixed-Use Communities must be concentrated from contiguous property owned under single ownership or control. Residential density is calculated from the upland and wetland acreage of the entire contiguous Southeast Lee County property. Increases in residential densities may be approved through incentives as specified in the LDC for permanent protection of indigenous native uplands on the contiguous tract (up to one extra dwelling unit allowed for each five acres of preserved or restored indigenous native uplands) and through the acquisition of TDUs from TDR sending areas within Southeast Lee County as provided in Objective 33.3.~~

~~a. The maximum gross density is 5 dwelling units per acre of total land designated as a Mixed-Use Community when TDUs are used.~~

~~b. Properties that concentrate development rights and/or use TDUs created from Southeast Lee County within the Mixed-Use Communities identified on Map 2-D will be allowed to develop using permitted uses and the property development regulations for the C-2A zoning district.~~

~~c. Contiguous property under the same ownership may be developed as part of a Mixed-Use Community provided it does not extend more than 400 feet beyond the perimeter of the Mixed-Use Community as designated on Map 2-D.~~

~~d. Commercial uses developed as part of a Mixed-Use Community will be consistent with Policy 33.2.5 and will not exceed the allowable total square footage for commercial uses in Southeast Lee County.~~

~~2. Contiguous property adjacent to the Mixed-Use Community located within the Lehigh Acres Community Plan Area may sum allowable dwelling units for entire property. The resulting allowable dwelling units may be allocated across the project regardless of the underlying future land use category, provided:~~

a. The project is developed as a Planned Development, and

b. The project maintains 60% open space.

3. Central water and wastewater services are required to develop a Mixed-Use Community.

POLICY 33.2.3: Properties within Southeast Lee County that have existing approvals for residential development inconsistent with the current DR/GR or Wetlands density requirements, may have a negative impact on surface and sub-surface water resources, impact habitat, and may encroach on environmentally important land if developed consistent with the vested approvals. As an incentive to reduce these potential impacts, additional densities may be granted if strict criteria improving the adverse impacts are followed.

1. These properties may be designated on Map 2-D as "Improved Residential Communities," provided they meet all of the following requirements:
   a. Abut lands designated as future urban areas;
   b. Adjacent to and eligible for public water and sewer services;
   c. Can provide two direct accesses to an arterial roadway, and;
   d. Is not already designated on Lee Plan Map 2-D as an Existing Acreage Subdivision or a Mixed-Use Community.

2. In order to request an increase in density, the property must be rezoned to a Residential Planned Development (RPD) that demonstrates and is conditioned to provide the following:
   a. Reduced stress to the onsite potable aquifers and is more consistent with water resource goals of Lee County in Southeast Lee County than the existing development approvals.
   b. Increased conservation areas, relative to the existing approvals, with a restoration plan and long term maintenance commitment.
   c. Active and passive recreational amenities.
   d. Demonstrates a net benefit for water resources, relative to the existing approvals that demonstrates the following.
      (1) Lower irrigation demand.
      (2) Eliminates private irrigation wells
      (3) Protects Public wells by meeting or exceeding the requirements of the Well Field Protection Ordinance.
      (4) Uses Florida Friendly Landscaping with low irrigation requirements in common elements.
      (5) Connects to public water and sewer service, and must connect to reuse water when available.
      (6) Reduces impervious area relative to existing approvals improving opportunities for groundwater recharge.
      (7) Designed to accommodate existing or historic flow-ways.
   e. Includes an enhanced lake management plan, that addresses at a minimum the following issues:
      (1) Best management practices for fertilizers and pesticides
      (2) Erosion control and bank stabilization
      (3) Lake maintenance requirements

(4) Public well field protection

f. Indigenous Management Plans must address human-wildlife coexistence.

3. Properties meeting the above criteria and requirements may be permitted additional residential dwelling units in addition to the already existing approvals, but in no case in excess of three dwelling units per DR/GR upland acre. The application for Residential Planned Development must identify the source of the additional residential dwelling units from the criteria below. Approval of the rezoning will be conditioned to reflect the source of additional dwelling units:
   a. 2 dwelling units for every acre of offsite DR/GR property acquired for conservation purposes with the possibility of passive recreation activities.
   b. 2 dwelling units for every additional acre of offsite DR/GR property put under a conservation easement dedicated to Lee County.
   c. 1.5 dwelling units for every additional acre of onsite property put under a conservation easement.
   d. 1 dwelling unit for every acre of onsite restoration, subject to restoration plan approval as part of the planned development rezoning process.
   e. 2 dwelling units for every acre of non-isolated DR/GR preserved primary and secondary panther habitat.
   f. 2 dwelling units for every acre of protected onsite wetlands connected to a regionally significant flow-way identified in the Lee Plan.
   g. 1 dwelling unit for every $8,500 (the current estimated cost to purchase an acre of Southeast DR/GR land) the applicant provides to the County to extinguish density on other Southeast DR/GR parcels.
   h. 1 dwelling unit for every $8,500 the applicant provides to the County to construct a planned large mammal roadway crossing in the Southeast DR/GR area.

   The improvements or acquisition of properties serve to mitigate impacts of the increased density. Future "Improved Residential Communities" proposed to be added to Map 2-D must provide a reanalysis of the cost to purchase one acre of DR/GR property if criteria g. or h. are used to account for the increased density.

POLICY 33.2.4: Lands that provide a significant regional hydrological and wildlife connection have the potential to improve, preserve, and restore regional surface and groundwater resources and indigenous wildlife habitats. These lands, located along Corkscrew and Alico Roads, can provide important hydrological connections to the Flint Pen Strand and the Stewart Cypress Slough as well as important wildlife habitat connections between existing CREW and Lee County properties. As an incentive to improve, preserve, and restore regional surface and groundwater resources and wildlife habitat of state and federally listed species additional densities and commercial uses may be granted if the project is found consistent with and demonstrates through a planned development rezoning the following:

1. These lands are within the "Environmental Enhancement and Preservation Communities" Overlay as designated on Map 2-D of the Plan. Lands eligible for designation on the Environmental Enhancement and Preservation Communities Overlay must be consistent with the criteria below:

- ~~Provide significant regional hydrological and wildlife connections and have the potential to improve, preserve, and restore regional surface and groundwater resources and indigenous wildlife habitats; and~~
- ~~Be located west of Lee County 20/20 Imperial Marsh Preserve (Corkscrew Tract) and within one mile north or south of Corkscrew Road. Properties with frontage on Corkscrew Road designated as Tier 1 Priority Restoration Area may extend the Overlay an additional mile south to include contiguous Tier 1 properties where the extension will result in regional environmental benefits by connecting protected habitat north of Corkscrew Road to land in Collier County used for conservation purposes; or,~~
- ~~Be located west of the intersection of Alico Road and Corkscrew Road, north of Corkscrew Road and south of Alico Road.~~

2. ~~The property is rezoned to a planned development that meets the following:~~
   a. ~~Planned development must include a minimum of 60% open space, not including previously mined lakes, which will be used to accommodate the following:~~
      1. ~~Restore and accommodate existing and historic regional flow-ways where they currently or previously existed;~~
      2. ~~Restore and accommodate existing and historic groundwater levels;~~
      3. ~~Restore and preserve wetlands;~~
      4. ~~Restore and preserve indigenous upland habitats;~~
      5. ~~Provide critical wildlife connections to adjacent conservation areas; and~~
      6. ~~Provide 100' foot buffer along Corkscrew Road East of Alico Road.~~
   b. ~~Includes an enhanced lake management plan, that:~~
      1. ~~Applies best management practices for fertilizers and pesticides;~~
      2. ~~Provides erosion control and bank stabilization; and~~
      3. ~~Establishes lake maintenance requirements.~~
   c. ~~Develop a site specific ecological and hydrological restoration plan which includes at a minimum the following: preliminary excavation and grading plans, analysis of hydrological improvements and water budget narrative, replanting plan, habitat restoration plan, success criteria, long term monitoring and maintenance.~~
   d. ~~Preservation areas must be platted in separate tracts and dedicated to an appropriate maintenance entity. For projects larger than 1,000 acres a CDD or a master home owners association must be created that will accept responsibility for perpetually maintaining the preservation requirements identified in the planned development, prior to issuance of certificate of compliance (CC) for first local development order.~~
   e. ~~Record a Conservation Easement for a minimum of 55% of the planned development, not including previously mined lakes, to be dedicated to the appropriate maintenance entity that provides Lee County or some other public agency, acceptable to Lee County, with third party enforcement rights. All Conservation Easements required as part of the planned development must be recorded within 5 years from first development order approval.~~
   f. ~~Indigenous management plans must address human-wildlife coexistence.~~
   g. ~~Uses Florida Friendly Landscaping with low irrigation requirements in common elements.~~
   h. ~~The stormwater management system must demonstrate through design or other means that water leaving the development meets state and federal water quality standards. The developer must obtain authorization from the Division of Natural Resources prior to discharge of stormwater from the development into the County's MS4 system directly or indirectly.~~

i. Irrigation and fertilizers (or other chemicals) for agricultural purposes must be entirely eliminated at time of first development order approval for row crops and no later than 5 years from first development order approval for citrus groves. If cessation of citrus groves is to be phased, a phasing plan provided at the time of zoning must demonstrate regional environmental benefits, including but not limited to regional or historic surface water and wildlife connections, occurring with the first phase of development.

j. Protects public wells through compliance with the requirements of the Well Field Protection Ordinance.

k. Each planned development within the Overlay will be required to mitigate the traffic impacts of the planned development and provide its proportionate share of the needed roadway improvements in accordance with Administrative Code (AC) 13-16. The proportionate share amount can be offset, in accordance with AC 13-16, by the dedication of needed right-of-way or the construction of improvements that would measurably lessen the need for roadway improvements, or by payment of impact fees, or use of impact fee credits, or as otherwise set forth in a written agreement between Lee County and the Developer. Prior to a final determination of a Project's proportionate share amount, compliance may be met through an enforceable instrument that obligates the property owners within a planned development to pay the Project's proportionate share, with said instrument being recorded prior to the issuance of any development order. For the developments known as WildBlue (CPA2014-00004) and Corkscrew Farms (CPA2015-00001) if the instrument is recorded prior to the final determination of the proportionate share amount, the proportionate share payment may not exceed $1,600 per unit above the road impact fee amount.

l. Connect to public water and sewer service. Connect to reuse water if available at time of development order approval.

m. Obtain written verification as to adequate public services for the planned development, from the sheriff, EMS, fire district, and Lee County School District.

n. Demonstrate that the planned development will not result in significant detrimental impacts on present or future water resources.

3. In recognition of the preservation, enhancement, and protection of regional flow-ways and natural habitat corridors, the interconnection with existing off-site conservation areas, and the significant enhancement, preservation and protection of these lands, additional density may be approved through planned developments meeting the criteria and requirements outlined above as follows:

   a. Tier 1 lands within the Priority Restoration Strategy will be permitted a maximum density of 1 unit per acre.

   b. Tier 2 lands within the Priority Restoration Strategy will be permitted a maximum density of 1 unit per 2 acres.

   c. Other lands within the Environmental Enhancement and Preservation Overlay, outside of Tier 1 and Tier 2, meeting the requirements above will be permitted a maximum density of 1 unit per 3 acres.

   d. Density in the Environmental Enhancement and Preservation Overlay will be based upon the acreage of the entire planned development (i.e. all areas within the boundary of the planned development whether uplands, wetlands, or lakes).

   e. Additional dwelling units may be approved in the planned development by using any combination of the following:

1) Utilize the Southeast Lee County TDR program to transfer dwelling units from Southeast Lee County lands located outside of the planned development pursuant to Policy 33.3.2.
2) Provide all of the following as part of the planned development for a density increase of up to 15%:
   i. A minimum of 65% open space, not including previously mined lakes; and
   ii. Significant regional hydrological connections that further Lee County's flood mitigation and flow-way restoration efforts by providing:
      a. Physical surface water connections to allow surface water to flow to and from adjacent properties and off-site flow-ways (to be considered site-related improvements); and
      b. Enhanced on-site surface water storage and flood attenuation.

4. Commercial uses may be approved as part of a mixed use planned development if the project is found consistent with all of the following:
   a. The project is a minimum of 2,000 acres;
   b. The project consists of both residential and commercial development and meets the minimum requirements of this policy;
   c. Wetlands may not be impacted by the commercial development area;
   d. The project will be consistent with Policy 33.2.5 and will not exceed the allowable total square footage for commercial uses in Southeast Lee County;
   e. Commercial uses and maximum floor area is limited to Neighborhood Commercial, as defined, and must not include any of the following uses: auto parts stores, lawn and garden supply stores, fuel pump stations, dryeleaners (on-site), or any other use that is not compatible with protecting Southeast Lee County's environment;
   f. Commercial development within the 6-month, 1-year, 5-year, or 10-year travel zones of the Wellfield Protection Ordinance must provide a total of 1½ inches of treatment, ½ inch of which must be completed via dry pretreatment, at a minimum. The entire commercial portion of the project will be considered to be within the most restrictive wellfield protection zone as provided in the Wellfield Protection Ordinance. Ground water quality monitoring well(s) for the Surficial Aquifer System must be provided and located between Lee County's nearest production well(s) and the commercial development; and
   g. The human-wildlife coexistence plan required by subsection 2.f. of this policy must include a commercial component that at a minimum provides for bear-proof refuse containers, below ground grease traps, and prevents light spillage onto adjacent preserve areas.

- Requirements of the overlays will remain requirements of the new Conservation Communities, but will be located in the Land Development Code. See attachment 2.

POLICY 33.2.5: Commercial uses may only be permitted if incorporated into a Mixed-Use Community, Environmental Enhancement and Preservation Community, or Rural Golf Course Community depicted on Map 2-D. The maximum commercial floor area that may be approved within the Southeast Lee County community plan area may not exceed 300,000 square feet.

- Removes the commercial cap.

OBJECTIVE 33.3: ~~SOUTHEAST LEE COUNTY TRANSFER OF DEVELOPMENT RIGHTS (Southeast Lee County TDR)~~LAND CONSERVATION PROGRAMS. To protect water resources and natural habitat of Southeast Lee County, Lee County establishes the Southeast Lee County Transferable Development Rights (TDR) and Flooding Mitigation programs. ~~may incorporate Southeast Lee County's purchase and transfer of development rights programs into the LDC.~~

POLICY 33.3.1 The ~~new~~ programs ~~may~~ create incentives for property owners or developers within Southeast Lee County to transfer development rights associated with ~~their~~ sending parcels to receiving lands outside the planning community.~~; or, residential areas identified on Map 2-D; Southeast DR/GR Residential Overlay as specified in Policy 33.3.2.~~

POLICY 33.3.2: The Southeast Lee County TDR program will have the following characteristics:

1. Creation of Transferable Development Units (Southeast Lee County TDUs).
   a. Up to one Southeast Lee County TDU may be created per five acres of preserved or indigenous wetlands.
   b. Up to two Southeast Lee County TDUs may be created from a single-family lot or parcel designated as wetlands that holds an affirmative Minimum Use Determination pursuant to Chapter XIII.
   c. Southeast Lee County TDU credits may be established from DR/GR designated lands as follows:
      1) Up to one Southeast Lee County TDU may be created for each ten upland acres encumbered by an agricultural easement.
      2) Up to one Southeast Lee County TDU may be created for each 5 upland acres with indigenous native or restored native vegetation encumbered by a conservation easement.
      ~~3) For each Southeast Lee County TDU credit allowed by c.1) or c.2) above, up to two extra TDU credits may be created if the sending area land is designated as Tier 1, Tier 2, Tier 3, or the southerly two miles of Tiers 5, 6, and 7 in the Priority Restoration Strategy (Map 1-D).~~

2. Receiving area density and intensity equivalents of Southeast Lee County TDUs.
   a. ~~In Mixed-Use Communities in Southeast Lee County identified on Map 2-D, each Southeast Lee County TDU credit may be redeemed for a maximum of one dwelling unit plus a maximum of 800 square feet of non-residential floor area.~~
   ~~b. In Improved Residential Communities in Southeast Lee County identified on Map 2-D, each Southeast Lee County TDU credit may be redeemed for a maximum of one dwelling unit.~~
   ~~c. In Rural Golf Course Communities in Southeast Lee County identified on Map 2-D, each Southeast Lee County TDU credit may be redeemed for a maximum of one dwelling unit or two bed and breakfast bedrooms.~~
   ~~d. In Environmental Enhancement and Preservation~~ Properties within the Conservation Community ~~Communities~~ future land use category may redeem ~~identified on Map 2-D,~~

~~each~~ Southeast Lee County TDU credits ~~may be redeemed~~ for a maximum of one dwelling unit per 10 acres ~~using~~when the credits are from DR/GR sending areas and a maximum of one dwelling unit per 20 acres ~~using~~ when credits are from wetland sending areas.

~~e~~b. No more than 2,000 dwelling units may be placed on receiving parcels within the Southeast Lee County Community Plan Area~~identified in subsections a. through d. above using the Southeast Lee County TDR program~~.

~~f~~c. Properties outside of the Southeast Lee County Community Plan area with ~~In the~~ Intensive Development, Central Urban, Urban Community, or General Interchange future land use ~~categories outside of Southeast Lee County, each Southeast Lee County TDU~~ may ~~be~~ redeem~~ed~~ Southeast Lee County TDUs for up to two dwelling units an acre. Southeast Lee County TDUs may not be redeemed for non-residential floor area in these future urban areas.

3. The LDC may include regulations that permit the County to evaluate the effectiveness of the Southeast Lee County TDR program and make changes that may further condition or restrict the use of Southeast Lee County TDUs.

- Updates the TDU program based on the changes to the overlays.

POLICY 33.3.4: Southeast Lee County Flooding Mitigation Lands Program allows developers to purchase property in the Southeast Lee County Community Plan Area identified for strategic county hazard mitigation projects in exchange for development approvals. Purchased property must be approved and dedicated to the county. The Flooding Mitigation Lands Program will be allocated per the following:

1. For projects within the Southeast Lee County Community Plan Area, incentives will be provided per the thresholds described in the LDC.

2. For projects outside of the Southeast Lee County Community Plan Area:

   a. Additional density may be applied to the receiving site at a rate of 2 units per acre of purchased and transferred land. The maximum density may not exceed the Bonus Density allowances of the land use category.

   b. Open space at a 1-acre for every 5 acres of purchased and transferred land. No more than 25% of the required open space may be offset by this allowance.

- Adds new land-swap options to assist in County projects for flooding mitigation.

OBJECTIVE 33.4: NONRESIDENTIAL USES. Livability in Southeast Lee County requires the allowance of nonresidential uses in addition to the uses allowed in the DR/GR to provide employment opportunities and reduce the number and duration of vehicle trips. Due to the potential environmental impacts of certain nonresidential uses, limitations are required to protect the County's water resources and safeguard natural resources. Similar to residential development in Southeast Lee County, nonresidential development must create, improve, preserve, and/or restore strategic surface and groundwater resources and indigenous wildlife habitats while balancing the need for commercial, industrial, and office uses to support the existing and anticipated surrounding residential development.

POLICY 33.4.1: Commercial, light industrial, and office uses within the Southeast Lee County Community Plan Area must have a future land use designation of Preservation and Innovation or Conservation Community and provide hydrological connections to regional watersheds, wildlife habitat connections to publicly- or privately-owned conservation lands, or strategic infrastructure connections to benefit the county's water resources.

POLICY 33.4.2: The County will create LDC requirements for nonresidential uses in the Southeast Lee County Community Plan Area.

POLICY 33.4.3: Nonresidential development in Southeast Lee County must demonstrate compliance with the established LDC requirements through a planned development and development agreement accepted by the County Attorney's Office.

POLICY 33.4.4: To preserve open space and ensure lower-intensity development, nonresidential development in Southeast Lee County may not exceed a Floor Area Ratio of 0.25.

- Adds new nonresidential development section.
- The specific development requirements will be in the Land Development Code. See attachment 2
- Added language to clarify that nonresidential development that is consistent with the DR/GR future land use category, such as aggregate mining, or other uses identified in Policy 2.1.3 may be developed within the DR/GR future land use category.

XII. Property Rights Element

GOAL 165: In accordance with §163.3177(6)(i), Fla. Stat., the following rights will be considered in local decision-making:

1. The right of a property owner to physically possess and control his or her interests in the property, including easements, leases, or mineral rights.
2. The right of a property owner to use, maintain, develop, and improve his or her property for personal use or for the use of any other person, subject to state law and local ordinances.
3. The right of the property owner to privacy and to exclude others from the property to protect the owner's possessions and property.
4. The right of a property owner to dispose of his or her property through sale, ~~or~~ gift, or other legal conveyance.

GOAL 166: County-initiated amendments may be made from time to time to update the Lee Plan, Future Land Use Map, or other regulatory documents to further the County's long-term vision for development.

OBJECTIVE 166.1: In certain instances where a county-initiated map or text amendment to the Lee Plan, Land Development Code, or zoning map changes the allowances on a property, the previous density and use allowances may be utilized in lieu of the changes.

POLICY 166.1.1: Properties previously identified as Mixed Use Community and Rural Golf Community in the Southeast Lee County Community Plan area may choose to develop under the regulations in effect prior to DATE by ORDINANCE, including requirements to concentrate development rights through the Southeast Lee County TDU program.

POLICY 166.1.2: Properties in the Southeast Lee County Community Plan Area whose land use was changed from DR/GR to Preservation and Innovation future land use category

may retain the use and density allowances effective prior to DATE of Ordinance, in lieu of the Preservation and Innovation allowances. However, in no instance shall the density exceed 1 unit per 10 acres.

- Adds language to the Property Rights Element to vest properties whose future land use has changed in these amendments.
- Added language to Goal 165 following the LPA hearing based on the LPA recommendation.

XIV. Glossary

COMMERCIAL DEVELOPMENT -- A use involving, in whole or in part, the sale of merchandise, materials, or services. Commercial development may include retail, wholesaling, personal services, temporary accommodations, recreation, office, or other uses that involve the transfer or sale of goods or services.

MINOR – Commercial development that ~~provides for the sale of convenience goods and services and~~ contains less than 30,000 square feet of gross floor area.

NEIGHBORHOOD – Commercial development that ~~provides for the sale of convenience goods and personal services, such as food, drug, sundries, and hardware items and~~ has a gross floor area range of 30,000 to 100,000 square feet.

COMMUNITY – Commercial development that ~~provides for the sale of retail goods such as clothing, variety items, appliances, and furniture as well as goods that may be found in a neighborhood commercial development and~~ has a gross floor area range of 100,000 to 400,000 square feet.

REGIONAL – Commercial development ~~that provides some functions of community commercial, in addition to providing a full range and variety of shopping goods for comparative shopping (such as general merchandise, apparel, furniture, and home furnishings) and~~ has a gross floor area range of 400,000 to 1 million square feet.

DISCOURAGED – To dissuade or attempt to dissuade from doing something, but not to prohibit outright; an unwanted action, not a prohibited one.

ENCOURAGED – A wanted action, but not the only action that may be acceptable.

FUTURE NON-URBAN AREAS – Those categories on the Future Land Use Map that are designated primarily for single use developments with a density equal to or less than 1 unit per acre unless otherwise allowed within a special treatment area identified in Objective 1.7: Rural, Rural Community Preserve, Coastal Rural, Outer Island, Open Lands, Wetlands, Conservation Lands (upland and wetland), New Community within the North Olga Planning Community, Conservation Community, and Density Reduction/Groundwater Resource.

FUTURE SUBURBAN AREAS – Those future urban categories on the Future Land Use Map that are designated primarily for single use developments: Suburban, Outlying Suburban, Sub-Outlying Suburban, Industrial Development, Airport, Tradeport, Innovation and Preservation, Commercial, Industrial Interchange, General Commercial Interchange, Industrial Commercial Interchange, University Village Interchange, University Community, Public Facilities, and the New Community within the Gateway/Airport Planning Community.

INDUSTRIAL DEVELOPMENT – A business use or activity involving manufacturing, fabrication, assembly, warehousing, and/or storage.

INDUSTRIAL, HEAVY – Manufacturing, resource refinement or extraction, other enterprises with significant external effects, or enterprises that pose significant risks due to the involvement of explosives, radioactive materials, poisons, pesticides, herbicides, or other hazardous materials in manufacturing or other processes. The location of a use does not indicate whether it is considered heavy industrial. Heavy Industrial uses can be inside or outside a building.

INDUSTRIAL, LIGHT – A use that involves the manufacturing, production, processing, fabrication, testing, assembly, treatment, repair, packaging, or warehousing of finished products within a building, without a noticeable amount of noise, dust, odor, smoke, glare, or vibrations.

- Broadens commercial definitions: Expands the definition of commercial development beyond retail while keeping existing size restrictions intact.
- Formally defines the terms "encourage" and "discourage" to match current practices.
- Defines industrial use and separates industrial activities into clear "Light" and "Heavy" categories to clarify existing Lee Plan policies.
- Land Development Code definitions may need future amendments to ensure consistency.

ATTACHMENT 1: Proposed Lee Plan Amendments

APPENDIX A: Maps

Map 1-A: Future Land Use Map

- Amend 5 properties from DR/GR and Wetlands to Conservation Community and Wetlands
- Amend 5 properties from DR/GR and Wetlands to Preservation & Innovation and Wetlands
- Amend 2 properties from DR/GR and Wetlands to Outlying Suburban and Wetlands
- Modified Wetland/Tradeport future land use category boundaries for 1 property based on a formal jurisdictional wetlands determination

Map 1-D: Special Treatment Areas

- Remove 'Priority Restoration Strategy Overlay'
- Add Existing Acreage Subdivision (Previously identified on Map 2-A)
- Add Rural Golf Course Community (Previously identified on Map 2-A)

Map 2-A: Community Planning Areas

- Modify the boundary of Southeast Lee County near the northwest and southwest corners of the planning area.

Map 2-D: Southeast DR/GR Residential Overlay

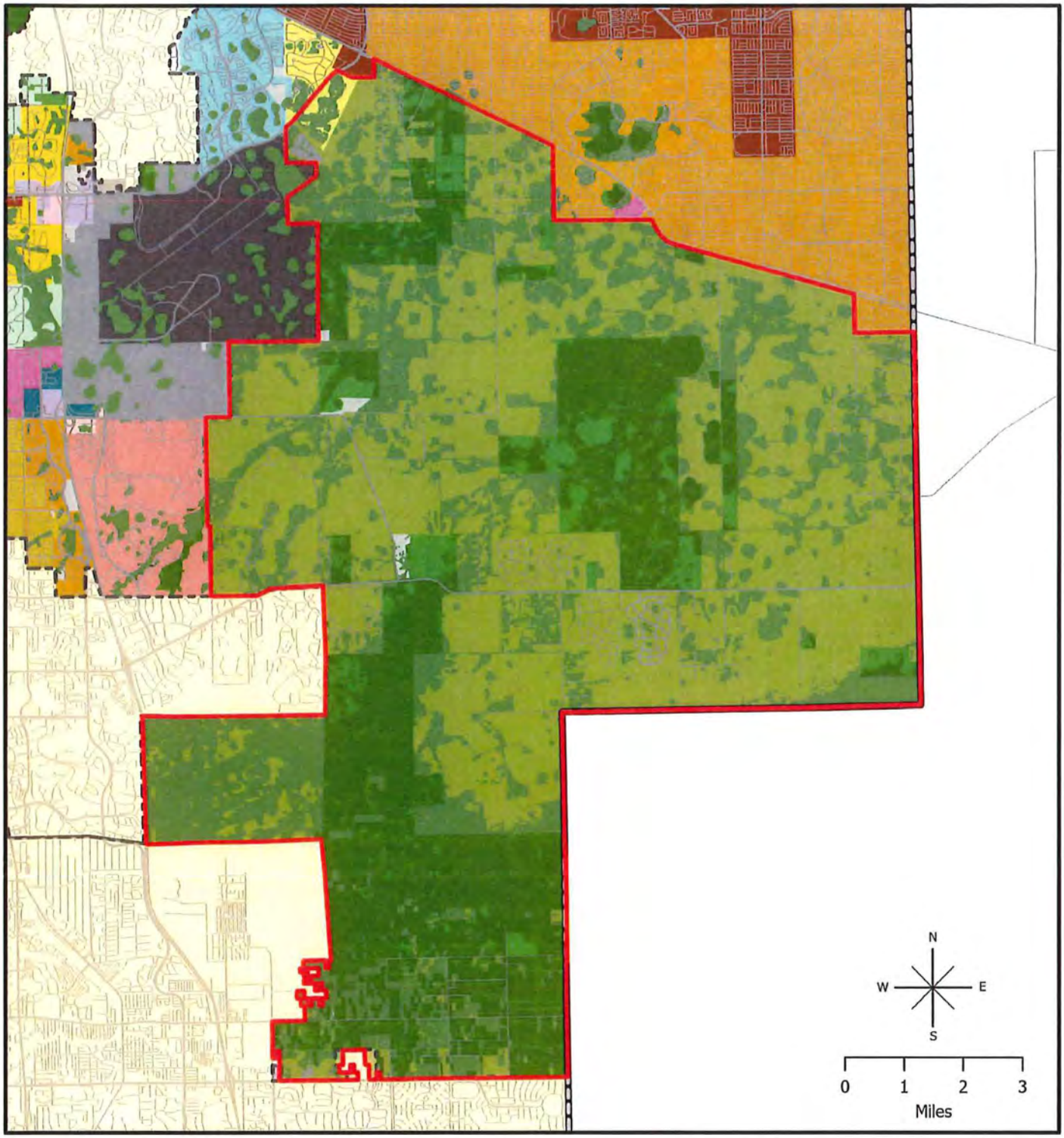
- Relocate Existing Acreage Subdivision to Map 1-D
- Delete Mixed Use Communities
- Relocate Rural Golf Course Community to Map 1-D
- Delete Improved Residential Community
- Delete Environmental Enhancement and Preservation Community Overlay (Properties to be designated as Conservation Community on the Future Land Use Map)
- Delete Map 2-D

Map 4-A:

- Update LCU Future Water Service Areas to include 9 additional properties

Map 4-B:

- Update LCU Future Sewer Service Areas to include 11 additional properties



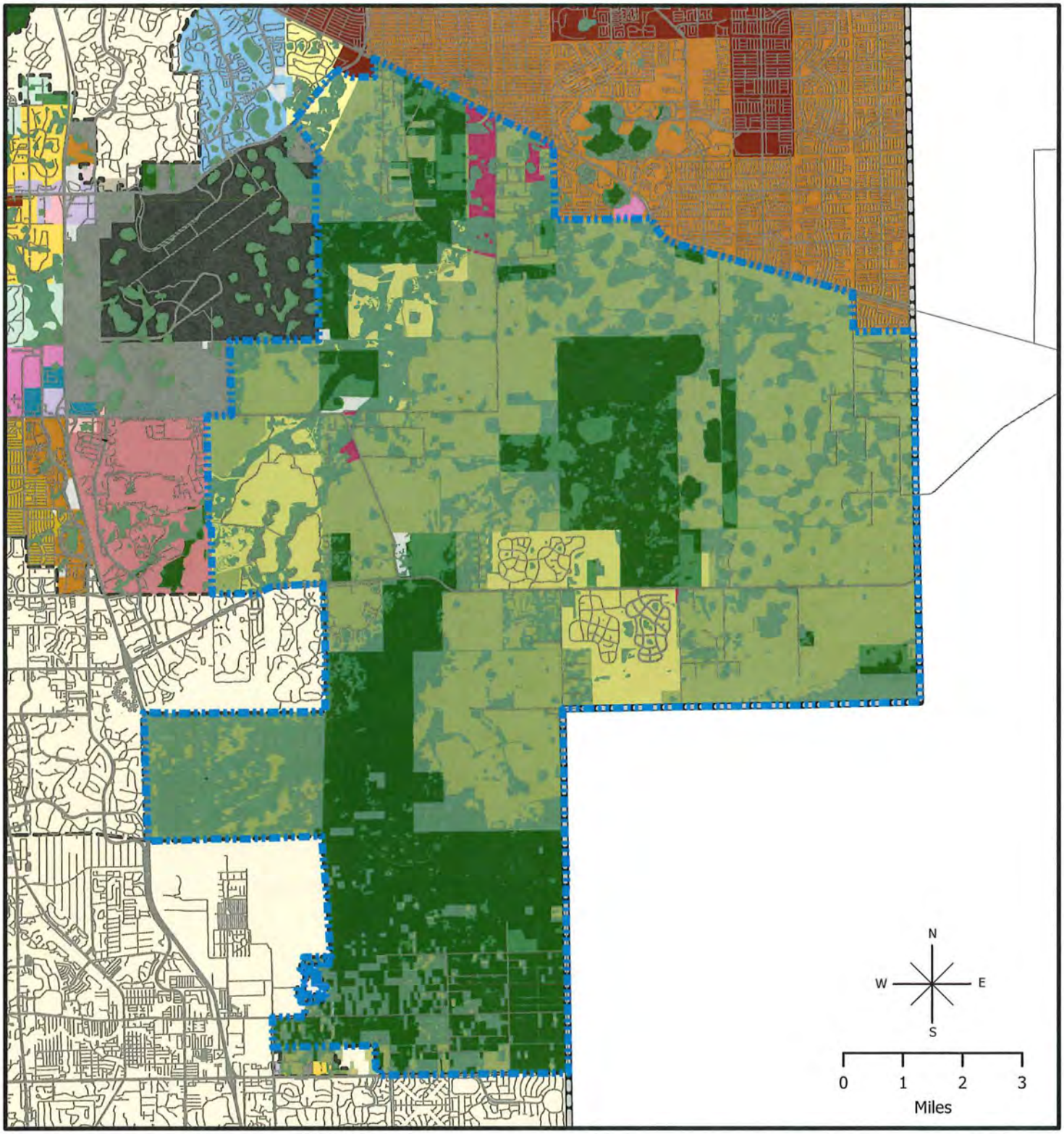
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Existing Future Land Use

- Airport
- Central Urban
- Conservation Lands Upland
- Conservation Lands Wetland
- Density Reduction/ Groundwater Resource
- General Interchange
- Industrial Commercial Interchange
- Industrial Development
- Intensive Development
- New Community
- Outlying Suburban
- Public Facilities
- Rural
- Sub-Outlying Suburban
- Suburban
- Tradeport
- University Community
- University Village Interchange
- Urban Community
- Wetlands
- Southeast Lee County
- City Limits

Lee County
Southwest Florida

Map Generated: July 2026



CPA2026-00004

Proposed Future Land Use

Existing Future Land Use Categories

- Airport
- Central Urban
- Conservation Lands Upland
- Conservation Lands Wetland
- Density Reduction/ Groundwater Resource
- General Interchange
- Industrial Commercial Interchange
- Industrial Development
- Intensive Development
- New Community
- Outlying Suburban
- Public Facilities
- Rural
- Sub-Outlying Suburban
- Suburban
- Tradeport
- University Community
- University Village Interchange
- Urban Community
- Wetlands

Proposed Future Land Use Categories

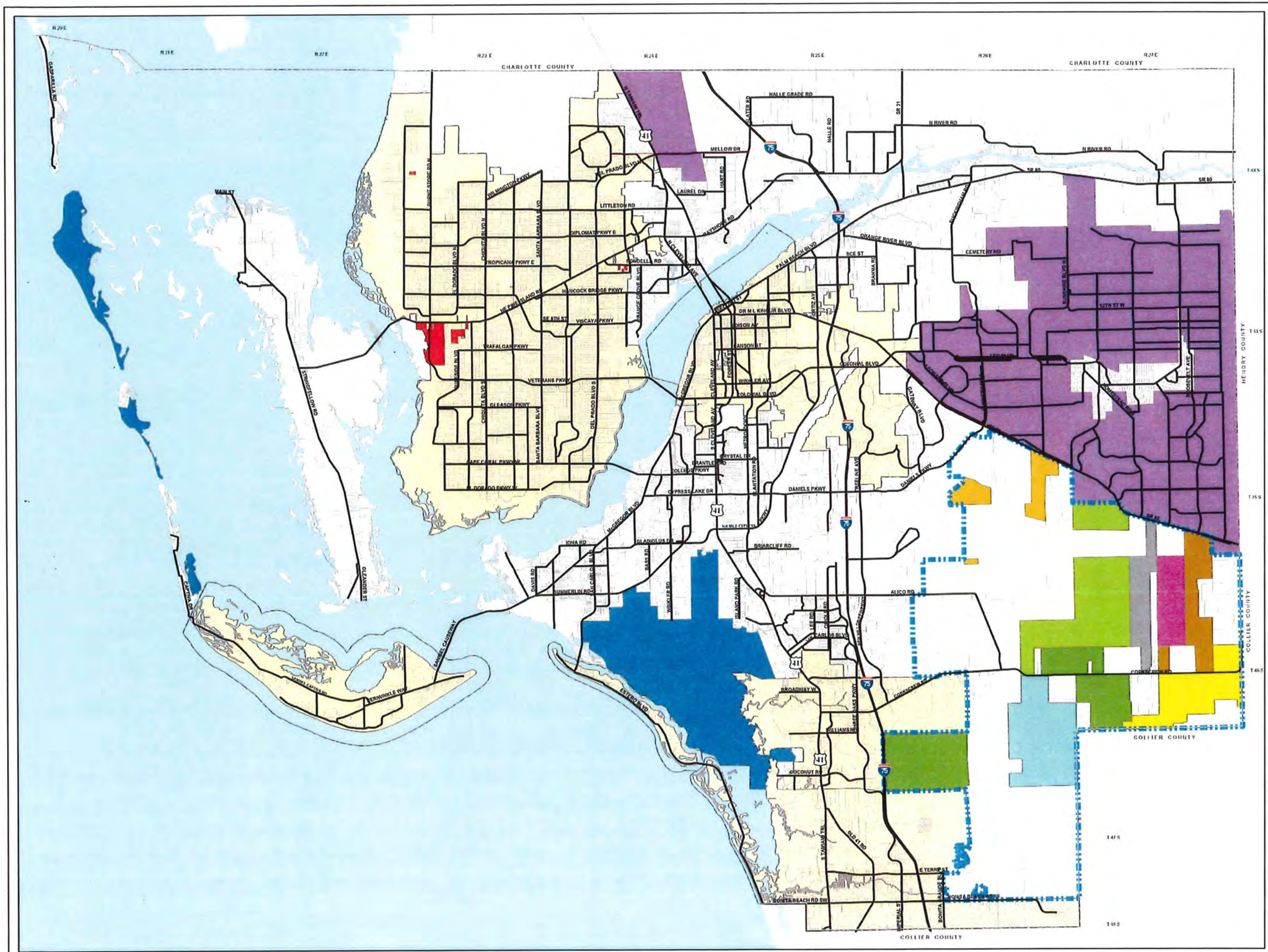
- Preservation and Innovation
- Conservation Community

Southeast Lee County

City Limits

Lee County
Southwest Florida

Map Generated: July 2026



SPECIAL TREATMENT AREAS

Current

- Uban Reserve
  Ord. No. 89-02, 93-25, 18-18
- Privately Funded Infrastructure
  Ord. No. 89-02, 93-25, 18-18
- Public Acquistion
  Ord. No. 89-02, 93-25, 18-18
- Airport Mitigation Overlay
  Ord. No. 04-16, 19-05
  See Objective 33.1
- Tier 1 (highest priority)
- Tier 2
- Tier 3
- Tier 4
- Tier 5
- Tier 6
- Tier 7
  Ord. No. 10-19
- City Limits
- Southeast Lee County

CPA2026-00004

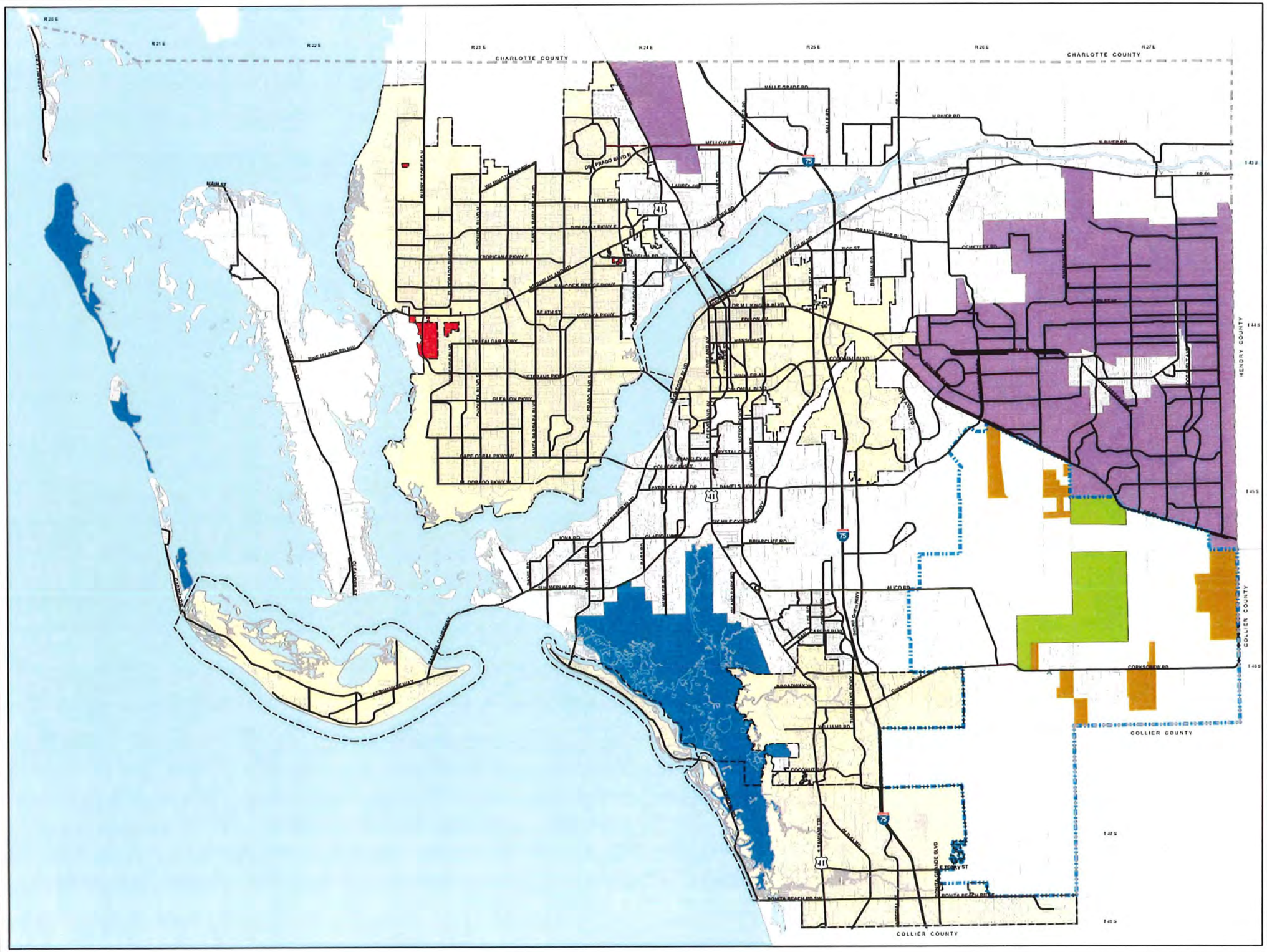
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Map Generated: November 2021
City limits current to date of map generation

Lee Plan Map 1-D



SPECIAL TREATMENT AREAS

PROPOSED

- Urban Reserve
  Ord. No. 89-02, 93-25, 18-18
- Privately Funded Infrastructure
  Ord. No. 89-02, 93-25, 18-18
- Public Acquistion
  Ord. No. 89-02, 93-25, 18-18
- Airport Mitigation Overlay
  Ord. No. 04-16, 19-05

Rural Residential Overlay

- Existing Acreage Subd.
- Rural Golf Course Community

Ord. No. 10-19, 10-21, 10-43, 12-24, 14-21, 15-13, 15-14, 17-06, 17-23, 17-24, 19-24

- City Limits
- Southeast Lee County

CPA2026-00004

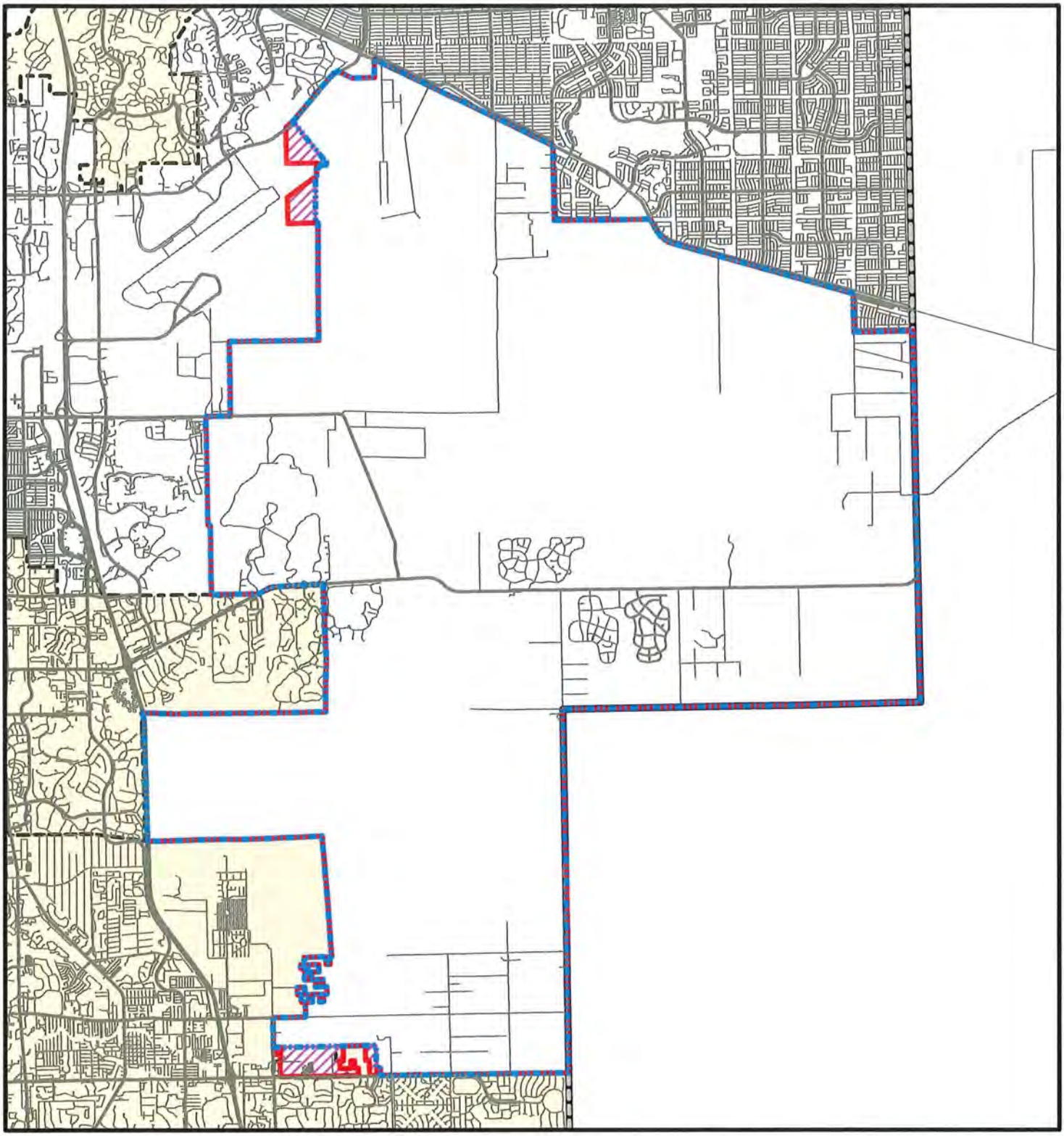
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City limits current to date of map generation

Lee Plan Map 1-D



CPA2026-00004

Community Planning Areas

Lee County
Southwest Florida

City Limits

Area to be removed

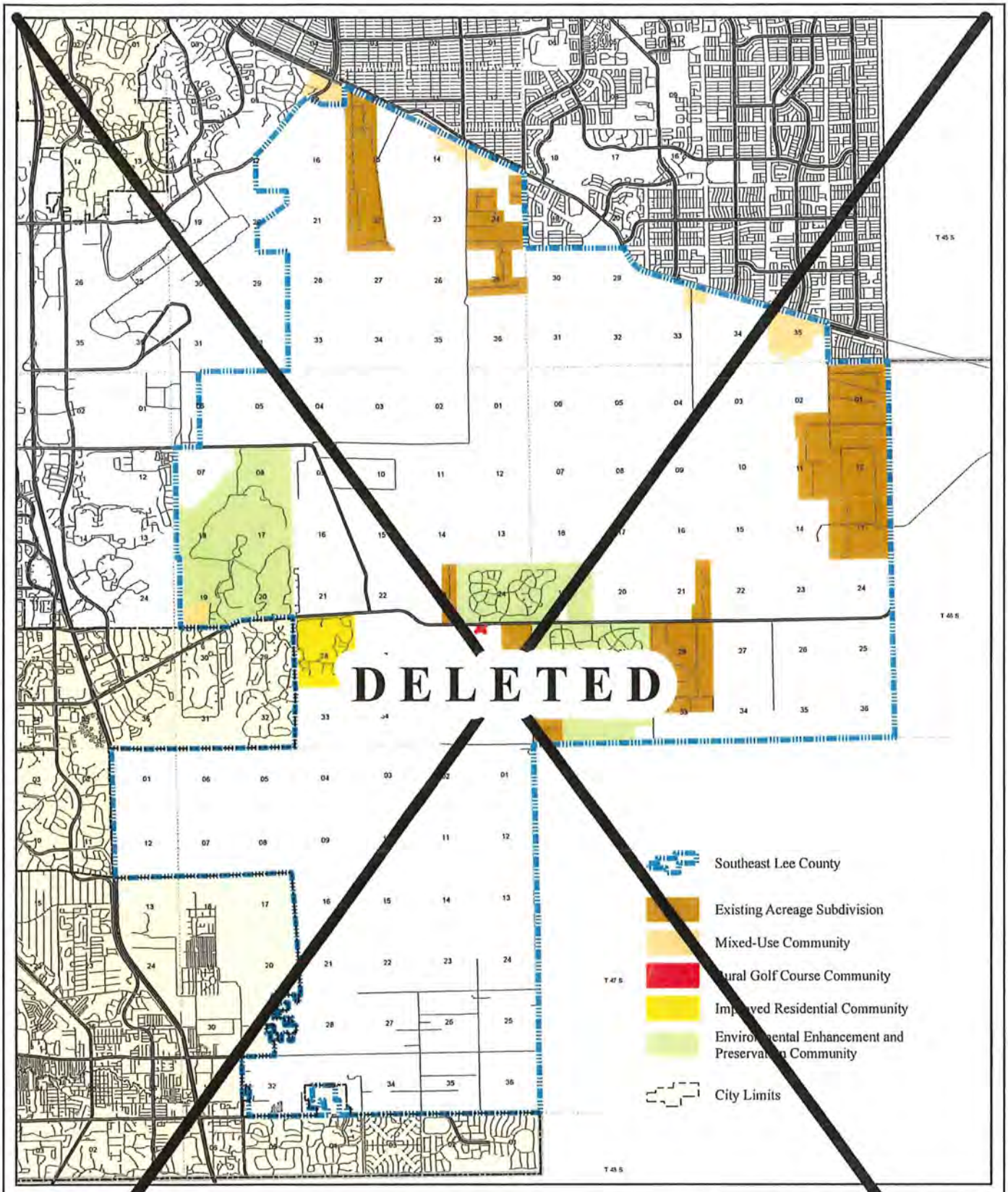
Southeast Lee County

Southeast Lee County

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Map Generated: August 2026



Lee County

Map G erated: July 2026
City mits current to date of map generation

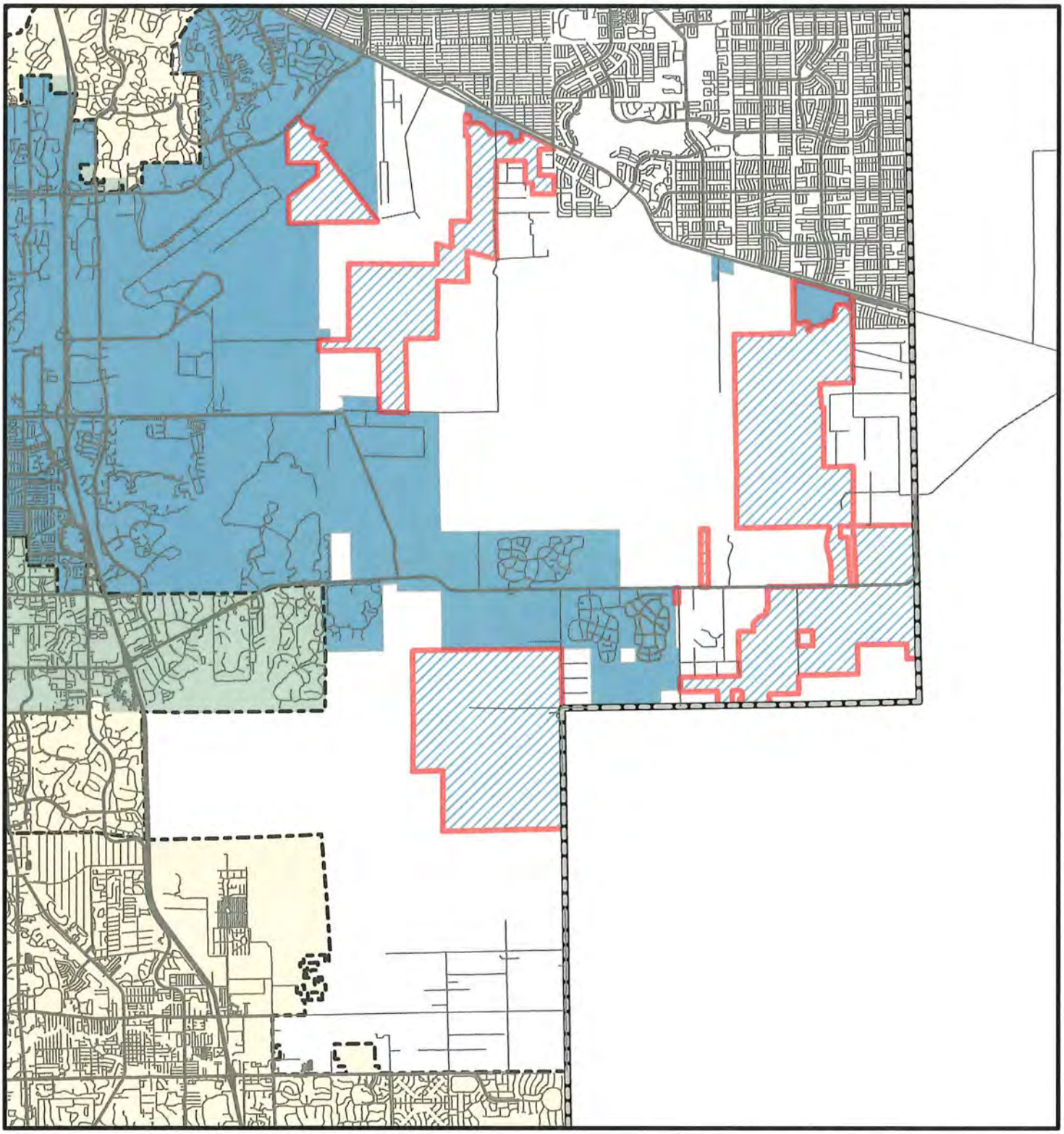
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-06, 17-23, 17-24, 19-24

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SOUTHEAST R/GR RESIDENTIAL OVER AY

Lee Plan Map 2-



CPA2026-00004

Future Water Service Areas

Lee County
Southwest Florida

City Limits

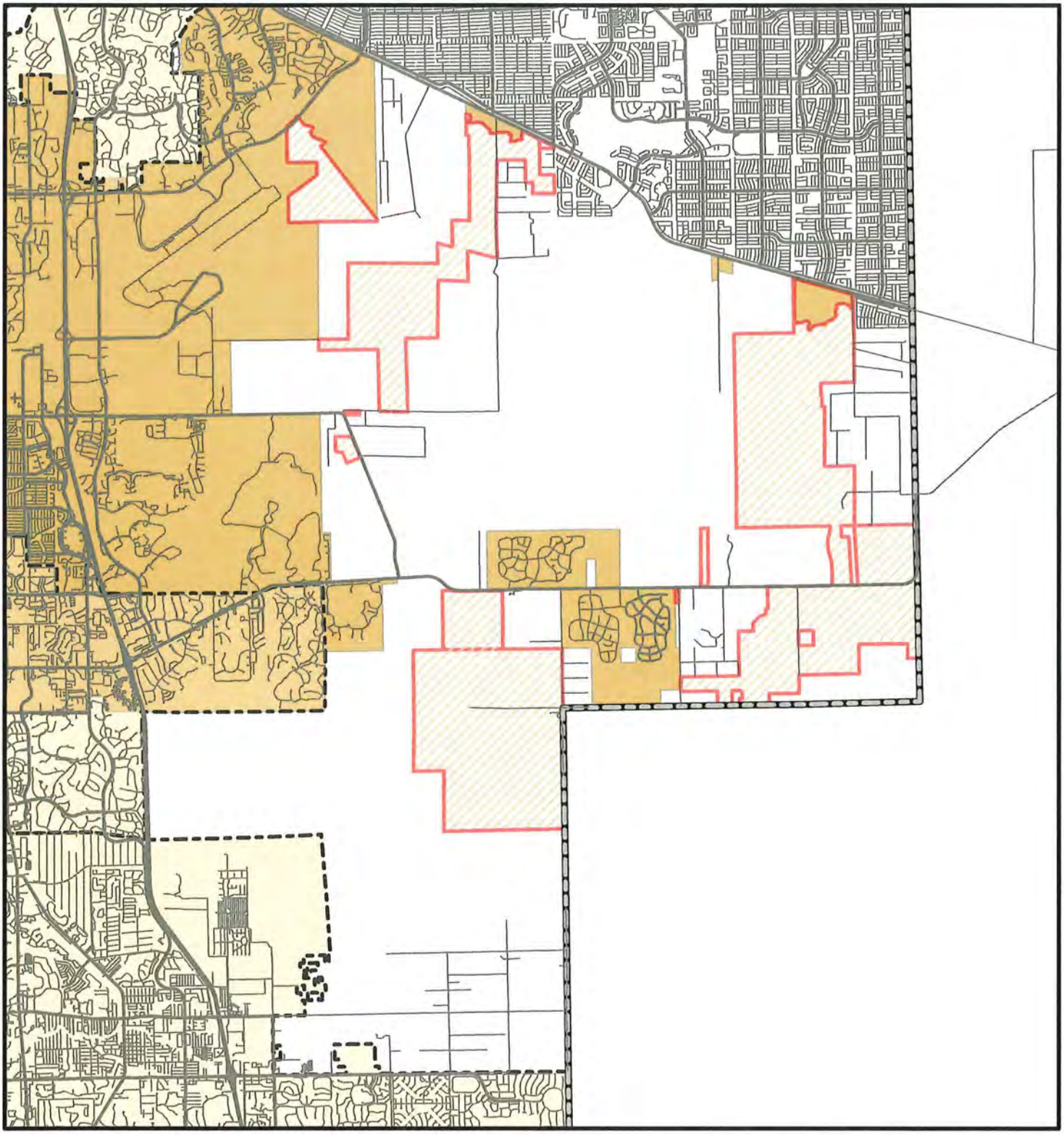
Proposed Future Water Service Areas

Existing Future Water Service Areas

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Map Generated: August 2026



CPA2026-00004

Future Sanitary Sewer Service Areas

Lee County
Southwest Florida

City Limits

Proposed Future Sewer Service Areas

Existing Future Sewer Service Areas

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Map Generated: August 2026

APPENDIX B: Tables

Table 1(a): Summary of Residential Densities

- Add Conservation Community future land use category and corresponding allowable densities.
- Add Preservation and Innovation future land use category and corresponding allowable densities.

TABLE 1(a)
SUMMARY OF RESIDENTIAL DENSITIES[1]

FUTURE LAND USE CATEGORY	STANDARD OR BASE DENSITY RANGE		BONUS DENSITY
	MINIMUM[2] (Dwelling Units per Gross Acre)	MAXIMUM (Dwelling Units per Gross Acre)	MAXIMUM TOTAL DENSITY[3] (Dwelling Units per Gross Acre)
Intensive Development[14]	8	14	22
General Interchange[2]	8	14	22
Central Urban[15]	4	10	15
Urban Community[4,5,16]	1	6	10
Suburban[17]	1	6	No Bonus
Outlying Suburban	1	3	No Bonus
Sub-Outlying Suburban	1	2	No Bonus
Conservation Community[13]	No Minimum	1.15	No Bonus
Rural[10]	No Minimum	1	No Bonus
Outer Islands	No Minimum	1	No Bonus
Rural Community Preserve[6]	No Minimum	1	No Bonus
Open Lands[7]	No Minimum	1 du/10 acres	No Bonus
Density Reduction/Groundwater Resource[13]	No Minimum	1 du/10 acres	No Bonus
Wetlands[8]	No Minimum	1 du/20 acres	No Bonus
New Community[19]	No Minimum	6	No Bonus
University Community[9]	1	2.5	No Bonus
Destination Resort Mixed Use Water Dependent[11]	6	9.36	No Bonus
Burnt Store Marina Village[12]	No Minimum	160 Dwelling Units; 145 Hotel Units	No Bonus
Coastal Rural[18]	No Minimum	1 du/2.7 acres	No Bonus

CLARIFICATIONS AND EXCEPTIONS

[1]See the glossary in Chapter XII for the full definition of "density".

[2]Except in the General Interchange future land use category adherence to minimum densities is not mandatory but is recommended to promote compact development.

[3]These maximum densities may be permitted by transferring density from non-contiguous land through the provisions of the Bonus Density Program identified in the LDC, Chapter 2.

[4]Within the Future Urban Areas of Pine Island Center, rezonings that will allow in excess of 3 du/acre must "acquire" the density above 3 du/acre utilizing Greater Pine Island TDUs (see Objective 24.6), or transfer dwelling units in accordance with Policy 24.3.4.

[5]In all cases on Gasparilla Island, the maximum density must not exceed 3 du/acre.

[6]Within the Buckingham area, new residential lots must have a minimum of 43,560 square feet.

[7]A maximum density of 1 du/5 acres can only be approved through the planned development process (see Policy 1.4.4), except in the approximately 135 acres of land lying east of US41 and north of Alico Road in the northwest corner of Section 5, Township 46, Range 25.

[8]Higher densities may be allowed under the following circumstances where wetlands are preserved on the subject site:

(a) If the dwelling units are relocated off-site through the TDR program provided in LDC, Chapter 2; or

(b) Dwelling units may be relocated to developable contiguous uplands designated Intensive Development, General Interchange, Central Urban, Urban Community, Suburban, Outlying Suburban, Sub-Outlying Suburban, and New Community from preserved freshwater wetlands at the same underlying density as permitted for those uplands (see Policy 124.1.1). Impacted wetlands will be calculated at the standard Wetlands density of 1 du/20 acres. Planned developments or development orders approved prior to October 20, 2010 are permitted the density approved prior to the adoption of CPA2008-18.

[9]The overall average density for the University Village sub-district must not exceed 2.5 du/acre.

[10]In the Rural category located in Section 24, Township 43 South, Range 23 East and south of Gator Slough, the maximum density is 1 du/2.25 acres.

[11]The overall number of residential dwelling units is limited to 271 units in the DRMUWD future land use category.

[12]The residential dwelling units and hotel development portions of this redevelopment project must be located outside of the designated Coastal High Hazard Area in accordance with Map 5-A.

[13]~~See Objectives 33.2 and 33.3 for potential density adjustments.~~ The maximum density in the Conservation Community future land use category is 1.15, inclusive of wetlands located within project boundaries (see Policies 1.4.8 and 33.2.2).

[14]The maximum total density may be increased to 30 du/acre utilizing Greater Pine Island TDUs.

[15]The maximum total density may be increased to 20 du/acre utilizing Greater Pine Island TDUs.

[16]The maximum total density may be increased to 15 du/acre utilizing Greater Pine Island TDUs.

[17]The maximum total density may be increased to 8 du/acre utilizing Greater Pine Island TDUs.

[18]The standard maximum density is 1 du/2.7 acres unless the "Adjusted Maximum Density" of 1 du/acre is achieved (see Policy 1.4.7 and LDC, Chapter 33).

[19]The maximum density in the New Community future land use category is limited to 1 du/1.9 acres in the North Olga Community Plan area (see Policy 1.1.15).

Sec. ##-1750 Applicability

The provisions of this article apply to all development within Southeast Lee County to ensure that development creates, preserves, or restores surface and groundwater resources and other natural systems, consistent with Lee Plan Goal 16.

Sec. ##-1752 Community Meetings

1. *Applications requiring review.* The owner(s), applicant(s), or other registered agent(s) applying for the following application types must hold one (1) public information session in Southeast Lee County. The information sessions may be offered virtually or in person. In-person meetings may be held within a five-mile radius of the subject property or at any location within the Community Plan Area, but must be within Lee County. Virtual meetings must be available to the public, allow public participation, and include a video feed so the public can see the proposed plans. Audio-only virtual meetings are not permitted. This session must be publicly advertised and held before the application is deemed sufficient. Public meetings are required for zoning actions requiring a public hearing.

2. *Meeting requirements.* The applicant is responsible for providing the meeting space, providing notice of the meeting, and providing security measures as needed. The applicant will determine the meeting location. Meetings may, but are not required to, be conducted before non-County-formed boards, committees, associations, or planning panels. During the meeting, the agent will provide a general overview of the project, including, but not limited to, a proposed site plan, for any interested citizens. After this meeting, the applicant must provide County staff with a meeting summary document that contains the following information: the date, time, and location of the meeting; a list of attendees; a summary of the concerns or issues that were raised at the meeting; and a proposal for how the applicant will respond to any issues that were raised. The applicant is not required to receive an affirmative vote or approval of citizens present at the meeting.

Sec. ##-1753 Deviations and Variances

Deviations and Variances for any of the requirements in this article must meet the County approval criteria for variances set forth in Section 34-145(b). No deviations or variances may be granted to Sec ##-1754.1, Sec ##-1754.2, or Sec ##-1755.

Sec. ##-1754 -- Residential Development.

Residential development exceeding 1 unit per 10 acres in the Conservation Communities future land use category may only be approved when the proposed development meets the requirements of this section and Lee Plan Goal 16. The County may require a Development Agreement or other legally binding agreement, approved by the County Attorney's Office, to

ensure the long-term maintenance, timing, or other factors related to the construction or function of these developments.

1. ***Density Incentives***. Density is determined based on the incentives provided in the planned development.
    a. One (1) dwelling unit per one (1) acre will be approved through the planned development when the proposed development includes seven (7) of the strategies in LDC Sec ##-1755.2, with at least one strategy from each category.
    b. One (1) unit per two (2) acres shall be approved when the proposed development includes five (5) of the strategies in LDC Sec ##-1755.2, with no more than 2 strategies from any one category.
    c. One (1) unit per three (3) acres shall be approved when the proposed development includes three (3) of the strategies in LDC Sec ##-1755.2, with strategies from at least 2 categories.
    d. Additional dwelling units may be approved in the planned development by using any combination of the following:
        i. Utilize the Southeast Lee County TDR program to transfer dwelling units from Southeast Lee County lands located outside of the planned development pursuant to Policy 16.3.2.
        ii. Provide all of the following as part of the planned development for a density increase of 5% per strategy, except when noted otherwise, for a maximum increase of up to 15%:
            1. A minimum of 65% open space, not including previously mined lakes or existing conservation easements; and
            2. Additional strategies from subsection 2, below.
            3. Two (2) dwelling units for every acre of offsite property identified in Lee Plan Map 1-D, acquired for Lee County Natural Resources water quality or flood mitigation projects.

2. Improvement Categories and Mitigation Strategies:
    a. Flooding Mitigation and Aquifer Recharge:
        i. Create, preserve, or restore flowways to reduce flooding and increase water recharge in the area. Such flowway projects that offer regional benefits may be completed off-site with approval from Lee County's Department of Natural Resources. A flowway is a broad, shallow, and slow-moving sheet flow of water. The flowway must distribute water across a broad front, allowing water to move naturally across the landscape while filtering nutrients and supporting native ecosystems.
        ii. A stormwater management system designed to accommodate a 100-year, 72-hour storm event.
    b. Minimize the Need for Irrigation:
        i. Landscaping utilizes drip irrigation and 100% drought-tolerant native plantings throughout the development and limits the use of turfgrass within all common areas to no more than 30%. Drip irrigation must have a minimum application efficiency of 95%, a distribution uniformity of 90%, and utilize sustainable management practices.

ii. Centralized irrigation system that meets the Water Conservation Ordinance and prohibits the construction of individual irrigation wells on residential lots. The development's irrigation must utilize stormwater ponds and, if necessary, be resupplied from an alternative aquifer or a blend of multiple aquifers to reduce demand on aquifers used by adjacent County or private wells.

iii. Extend, connect to, and utilize reuse water for 100% of the development's irrigation needs.

c. Wildlife:

i. Create, preserve, or restore wildlife connections to adjacent conservation areas.

ii. Provided wildlife connection(s) must be a minimum of 300 feet wide and designed to allow mammals to traverse the project property and connect to adjacent conservation areas.

iii. Create designated mammal crossings for roadways to promote the movement of wildlife within and through the development. Crossing designs should include exclusion and wing/funnel fencing designed for the target species, including below-ground apron fencing for burrowing species, and long enough to prevent wildlife from bypassing the crossing.

iv. Create, preserve, or restore habitat with plant species that support foraging within primary and secondary panther habitat.

d. Wetlands and Native Habitat:

i. All wetlands are preserved and restored.

ii. Create, preserve, or restore upland habitat. Upland habitat must comprise a minimum of 40% of the required open space and have an average minimum width of 40 feet.

e. Wildfire Prevention:

i. Create a wildfire prevention plan per the Public Safety requirements, including but not limited to access points for wildfire response, prescribed burn schedule, or separation measures for spread mitigation.

ii. Bury all utilities to prevent potential arcing or sparking

3. ***Planned Development Requirements***. Properties within the Conservation Communities Future Land Use Category must be rezoned to a planned development that includes the following, in addition to any requirements set forth in LDC Chapter 34, Article IV.

a. Connections to public water and sewer services. Development must also connect to public reuse infrastructure if available at the time of the development order.

b. A minimum of 60% open space, not including previously mined lakes, which will be used to accommodate the following, when applicable:

i. Restore and accommodate existing and historic regional flowways where they currently or previously existed;

ii. Restore and accommodate existing and historic groundwater levels;

iii. Restore and preserve wetlands;

iv. Restore and preserve indigenous upland habitats;

v. Provide critical wildlife connections to adjacent conservation areas; and
vi. Provide a 100-foot buffer along Corkscrew Road.

c. Includes an enhanced lake management plan that:
   i. Applies best management practices for fertilizers and pesticides;
   ii. Provides erosion control and bank stabilization; and
   iii. Establishes lake maintenance requirements.

d. A site-specific ecological and hydrological restoration plan which includes, at a minimum, the following: preliminary excavation and grading plans, analysis of hydrological improvements and water budget narrative, replanting plan, habitat restoration plan, success criteria, long-term monitoring and maintenance.

e. Preservation areas must be platted in separate tracts and dedicated to an appropriate maintenance entity.

f. Record a Conservation Easement for a minimum of 55% of the planned development, not including previously mined lakes or existing conservation easements to be dedicated to the appropriate maintenance entity that provides Lee County or some other public agency, acceptable to Lee County, with third-party enforcement rights. All Conservation Easements required as part of the planned development must be recorded within 5 years from the first development order approval. For sites with previously approved mines, the existing recorded conservation easements may not contribute more than 25% of the required minimum.

g. Indigenous management plans must address human-wildlife coexistence.

h. Uses Florida-Friendly Landscaping with low irrigation requirements in common elements. The Development Order must demonstrate that all landscaping uses drip irrigation, features drought-tolerant native plants, and limits turfgrass in all common areas to no more than 30%. Drip irrigation must have a minimum application efficiency of 95%, a distribution uniformity of 90%, and utilize sustainable management practices.

i. Internal circulation and a proportionate fair share of the required transportation network improvements in accordance with Administrative Code (AC) 13-16.

j. Obtain written confirmation from the Lee County Sheriff's Office, Public Safety (EMS), the applicable fire district, and Lee County Schools regarding the availability of sufficient public services for the proposed development.

k. Demonstrate that the planned development will not result in significant detrimental impacts on present or future water resources.

Sec. ##-1755 Nonresidential Development

Nonresidential development in the **Preservation and Innovation** and **Conservation Community** land use categories may only be approved when the proposed development meets the requirements of this section and Lee Plan Goal 16. The County may require a Development Agreement or other legally binding agreement, approved by the County Attorney's Office, to ensure the long-term maintenance, timing, or other factors related to the construction or function of these developments.

1. ***Planned Development Requirements***. Non-residential uses may be permitted in Southeast Lee County through a planned development that includes the following, in addition to any requirements set forth in LDC Chapter 34, Article IV.
    a. Connections to public water and sewer services. Development must also connect to public reuse infrastructure if available at the time of the development order.
    b. Demonstrates through data and analysis that the planned development will not result in significant detrimental impacts on present or future water resources. Proposed uses may not pollute, degrade, or overconsume surface and groundwater resources, or engage in any other activity that Lee County's Department of Natural Resources determines to be incompatible with protecting Southeast Lee County's environment. Overconsumption is defined as water use exceeding 1.2 million gallons per acre per year, based on the developable area.
    c. Nonresidential development within the 6-month, 1-year, 5-year, or 10-year travel zones as defined in the Wellfield Protection Ordinance must:
        i. Meet or exceed SFWMD's nutrient removal standards for Outstanding Florida Waters (OFW).
        ii. Conform to the most restrictive wellfield protection zone found on-site.
        iii. Provide monitoring well(s) located between Lee County's nearest production well(s) and the nonresidential development.
    d. Provides a minimum of 40% open space, which may consist of buffers, wetlands, indigenous uplands, and wildlife crossings. Stormwater systems may contribute up to 25% of the open space requirement. A project may provide off-site mitigation by acquiring and transferring to Lee County Natural Resources property acceptable to the county, specifically properties depicted on Map 1-D, for an open space credit of up to 25%.
    e. Properties along Corkscrew Road must provide a 100-foot-wide buffer along the Corkscrew Road right-of-way.
    f. Develop a site-specific ecological and hydrological restoration plan which includes, at a minimum, the following: preliminary excavation and grading plans, analysis of hydrological improvements and water narrative, replanting plan, habitat restoration plan, success criteria, and a mechanism for long-term monitoring and maintenance.
    g. Develop an indigenous management plan addressing human-wildlife coexistence, including, but not limited to, wildlife-resistant refuse containers, wildlife corridor management, and native habitat restoration.
    h. All connected wetlands and regional historic flowways must be restored or preserved. The flowway must distribute water across a broad front, allowing water to move naturally across the landscape while filtering nutrients and supporting native ecosystems.
    i. Internal landscaping and buffers must create or restore indigenous upland habitat as part of the required open space.
    j. Landscaping must utilize drip irrigation, use drought-tolerant native plants, and limit the use of turfgrass within all common areas to no more than 30%. Drip irrigation

must have a minimum application efficiency of 95%, a distribution uniformity of 90%, and utilize sustainable management practices.

k. Stormwater management system must be designed for a 100-year, 72-hour storm event and include an enhanced lake management plan that establishes surface and groundwater monitoring and maintenance plans, applies best management practices for fertilizers and pesticides, and provides erosion control and bank stabilization.

l. All electrical utilities within the site must be buried within dedicated public utility easements.

m. Development along SR 82 and the Alico Extension must demonstrate safe pedestrian connectivity across the right-of-way within the extended pedestrian shed from the site.

n. Internal circulation and a proportionate fair share of the required transportation network improvements in accordance with Administrative Code (AC) 13-16.

o. Obtain written confirmation from the Lee County Sheriff's Office, Public Safety (EMS), and the applicable fire district regarding the availability of sufficient public services for the proposed development.

p. Create a wildfire prevention plan per the Public Safety requirements, including but not limited to access points for wildfire response, prescribed burn schedule, or separation measures for spread mitigation.

Sec. 34-2175. Height limitations for special areas and Lee Plan land use categories.

The following areas have special maximum height limitations applicable to all conventional and planned development districts:

(a) *no proposed changes*

(b) *Lee Plan land use categories.* Except as otherwise provided herein, maximum building height is established by future land use category as follows:

TABLE 34-2175(b)
MAXIMUM BUILDING HEIGHT BY FUTURE LAND USE CATEGORY

Future Land Use Category	Notes	Maximum Building Height
Destination Resort Mixed Use Water Dependent		Per Lee Plan
Intensive Development		135 feet
Central Urban		
Urban Community		95 feet
Airport Lands	Note (1)	45 feet
Tradeport	Note (1)	
University Community	Note (1)	
University Village Interchange	Note (1)	
Commercial		75 feet
General Commercial Interchange		
General Interchange		
Industrial Commercial Interchange		

Industrial Development		
Industrial Interchange		
Conservation Community	Note (1)	45 feet
Density Reduction/Groundwater Resource		
Open Lands		
Outer Islands		
Outlying Suburban	Note (2)	
Preservation and Innovation	Note (2)	
Public Facilities		
Rural	Note (2)	
Rural Community Preserve		
Sub-outlying Suburban	Note (2)	
Suburban	Note (2)	

Notes:
(1) With the consent of the Lee County Port Authority, the Board of County Commissioners may approve building heights up to 95 feet.
(2) Buildings may be as tall as 75 feet when the applicant demonstrates through a zoning action that the additional height is required to preserve environmentally sensitive land, secure areas of native vegetation and wildlife habitat, or preserve historical, archaeological or scenic resources.

ATTACHMENT V

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,

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.

ATTACHMENT W

RESOLUTION Z-74-227

The following resolution was offered by Commissioner Kenneth Daniels and seconded by Commissioner Richard Sayers, and upon poll of the members present the vote was as follows:

George Goldtrap	ABSENT
James Sweeney	AYE
Richard Sayers	AYE
Walter Shirey	AYE
Kenneth Daniels	AYE

WHEREAS, A.S. Crisafulli has requested a special permit in an AU zone for a borrow pit.

SUBJECT PROPERTY: The East 3/4 of the Southeast 1/4 of the Southeast 1/4 of Section 32, Township 47, Range 26.

WHEREAS, a public hearing of the Lee County Zoning Board was advertised and held, as requested by law, and after hearing all interested parties and considering adjacent areas, the Zoning Board recommended that the petition be approved for a special permit in an AU zone for a borrow pit.

WHEREAS, this Board after reviewing the records and recommendations of the Zoning Board and having given an opportunity to all interested persons to be heard after being duly sworn according to law, and upon due and proper consideration having been given to this matter, this Board took action as hereinafter described.

NOW THEREFORE BE IT RESOLVED by the Board of County Commissioners, Lee County, Florida, that the decision of the Zoning Board of recommend approval for a special permit in an AU zone for a borrow pit be set aside and grant a special permit for a borrow pit subject to bringing back development plans which would show RU-1 lots around lake.

PASSED & ADOPTED THIS 8th DAY OF July, 1974

74-6-15