



CONDITIONAL USE PERMIT STAFF REPORT

OFFICE OF PLANNING & ZONING

Tab Number: 3
Public Hearings: Planning & Zoning Board (PZB): September 3, 2025
Board of County Commissioners (BCC): October 7, 2025
Case No. and Project Name: PZ2025-137, Gulfstream Towers FL242
Commissioner District: District 4 – Leslie Campione
Applicant: Mary D. Solik, Esq.
Owner: Norman T. Lindemann and Pamela S. Lindemann
Requested Action: Conditional use permit (CUP) to allow a 180-foot monopine communications tower on an Agriculture (A) District zoned parcel, with a waiver to LDR Section 3.13.09(B)(1) to allow the proposed monopine communications tower to be constructed off-center.
Staff Determination: Staff finds the CUP application consistent with the LDR and Comprehensive Plan.
Case Manager: James Frye, Planner II
PZB Recommendation:

Subject Property Information

Size: 3,600 +/- square feet compound lease area (6.17 +/- acres parent parcel)
Location: 27402 County Road 42, in the Paisley area of unincorporated Lake County
Alternate Key Nos.: 1510929
Future Land Use: Rural (Attachment "A")
Current Zoning District: Agriculture (A) (Attachment "B")
Flood Zones: "X"
Joint Planning Area: N/A
Overlay Districts: Wekiva – Ocala Rural Protection Area and the Pinecastle Range Complex Military Operations Area (MOA) (Attachment "C")

Adjacent Property Land Use Table

Direction	Future Land Use	Zoning	Existing Use	Comments
North	Rural	Agriculture (A)	Agricultural Homesite and County Road 42	Agricultural classification by the Lake County Property Appraiser for timber, north of County Road 42
South	Rural	Ranchette District (RA)	Agricultural Homesite	Agricultural classification by the Lake County Property Appraiser for timber
East	Rural	Agriculture (A)	Single Family Dwelling Unit	Single Family Dwelling Unit
West	Rural	Ranchette District (RA)	Agriculture	Agricultural classification by the Lake County Property Appraiser for timber

- Summary of Analysis -

The subject 3,600 +/- square feet lease parcel lies within a parent parcel comprised of 6.17 +/- acres, identified by Alternate Key Number 1510929, and located at 27402 County Road 42, in the Paisley area of unincorporated Lake County. The parcel is zoned Agriculture (A) District; is designated with a Rural Future Land Use Category (FLUC); and located within the Wekiva – Ocala Rural Protection Area and the Pinecastle Range Complex Military Operations Area (MOA).

The Applicant seeks conditional approval for a 175-foot monopine communications tower with a 5-foot lightning rod, with maximum structure height of 180-feet within a 3,600 square foot compound area; the tower will provide infrastructure to support the antennas of four (4) wireless telecommunication providers. A Concept Plan was provided by the Applicant (Attachment “D”)

The Applicant is requesting one waiver, as outlined in the Project Narrative, Attachment “E”, more specifically requesting a waiver to LDR Section 3.13.09(B)(1) to allow the proposed monopine communications tower to be constructed off-center.

Approval of this application is contingent upon the Board of County Commissioners granting the waivers to the tower’s location requirements.

The subject parcel is located within Pinecastle Range Complex Military Operations Area (MOA) and the application was provided to the United States Navy for review. The United States Navy provided comments stating they are not opposed to the tower. However, the tower will be required to be lit with Night Vision Goggle (NVG) compatible lighting to ensure safety for pilots due to helicopters flying below 180-feet above ground level. (Attachment “F”)

- Analysis -

LDR Section 3.13.19 (Standards for Review)

- A. The following non-comprehensive list of items shall be considered when reviewing for Aesthetic impacts: the amount of the Tower that can be viewed from surrounding Residential Zones in conjunction with its proximity (distance) to the residential zone, landscaping, existing character of surrounding area and any other visual options proposed by the Applicant. The tower may be placed, designed or camouflaged to assist with mitigating the overall aesthetic impact.**

Undue aesthetic impacts from the proposed telecommunications tower to the surrounding parcels are not anticipated. The proposed tower is a monopine type tower and is intended to blend with the existing tree canopy on the parcel. Per LDR Section 3.13.03, entitled *Structural Design*, camouflaged wireless communications structures designed to blend in with the existing built or natural environment are exempt from the fencing and landscaping requirements of this section (Attachment “D”)

- B. The degree to which a Tower is designed and located in order to be compatible with the nature and character of Land Uses and/or the environment within which the Tower is proposed to be located. The tower may be placed, designed or camouflaged to assist with compatibility. A camouflaged tower Shall be designed to be compatible with the surrounding Land Uses and the environment.**

The proposed request is consistent with Land Development Regulations (LDR) Section 3.13.19(B), *Conditional Use and Community Facility District (CFD) Criteria*, which conditionally allows telecommunications towers to be placed, designed or camouflaged to be compatible with the nature and character of land used and/or the environment in which the tower is proposed to be located. Within the Agriculture (A) zoning district camouflaged communication towers are listed as a permitted use per LDR Table 3.01.03, entitled *Schedule of Permitted and Conditional Uses*.

- C. The minimum performance standards with respect to separation between Towers, separation between residential uses and Towers, etc., as referenced in Section 3.13.00, Shall be met. The Board of County Commissioners may impose more restrictive Conditions to a Conditional Use Permit or CFD request in order to achieve the desired protection with respect to aesthetic impact and harmony and compatibility with the surrounding community. The determination by the Board of County Commissioners to impose more restrictive conditions Shall be based on substantial competent evidence.**

The proposed request is consistent with LDR Section 3.13.09 Tower Table 1, *Additional Tower Setbacks*, which requires camouflaged towers to be located one hundred (100) feet from residential or Planned Unit Development (PUD) zoned lands and from any single-family or duplex residential unit. Additionally, the proposed location is greater than five-hundred and fifty (550) feet from the nearest single-family residential unit not located within the parent parcel and located directly east within the parcel identified by Alternate Key Number 1311179.

The proposed request is consistent with LDR Section 3.13.10, *Separation between Towers*, which establishes setbacks for communication towers as shown in the Separation Tower Map (Attachment "G").

LDR Section 14.05.03 (Standards for Review)

- A. Consistency with the Comprehensive Plan and Local Code (Land Development Regulations).**

The proposed request is consistent with LDR Table 3.01.03, *Schedule of Permitted and Conditional Uses*, which permits camouflaged telecommunication towers within the Agriculture (A) District.

The proposed request is consistent with LDR Section 3.13.09, Tower Table 1, *Additional Tower Setbacks*, which requires the tower to be located 100-feet from residentially or PUD zoned lands (Attachment "D"). However, the Applicant is seeking a waiver to the requirement the tower be centered on the property on the grounds that there is a drainage swale in the center of the property. In lieu of the center, the Applicant is requested to locate the tower twenty-nine feet, seven inches (29'7") to the south, as close as possible to the center of the property and allowing the Tower Compound to be located outside the drainage swale as well.

The proposed request is consistent with LDR Section 3.13.10, *Separation between Towers*, which establishes setbacks for communication towers as shown in the Separation Tower Map (Attachment "G").

The proposed request is consistent with Comprehensive Plan Policy I-7.2.6, *Communication Towers within Residential Areas*, which requires the County to adopt siting and design criteria land development regulations to protect existing and future residential neighborhoods from potential adverse impacts resulting from these facilities. The proposed use is consistent with the adopted LDR.

The request is consistent with Comprehensive Plan Policy I-1.4.4, *Rural FLUC*, which conditionally allows civic uses. The 2030 Comprehensive Plan defines "civic uses" as a county, municipal, state, or federal use or service, and community facility uses, excluding schools. Wireless antennas, towers, and equipment are listed as a Community Facility Use pursuant to LDR Section 3.01.03, entitled *Schedule of Permitted and Conditional Uses*.

The request is consistent with Comprehensive Plan Policy I-5.2.2, *Land Use in the Wekiva-Ocala Rural Protection Area*. The County has adopted specific development design standards within Rural Protection Areas (RPA). The parent parcel does not contain wetlands and is located within Flood Zone X. There are no anticipated adverse effects to the environment with the proposed communication tower. Within the Wekiva-Ocala RPA, land use is limited to the Rural FLUC, Conservation FLUC, and the Public Benefit Future Land Use Series.

The request is consistent with Comprehensive Plan Policy I-6.4.5, entitled *Cell Towers*. Within the Pine Castle MOA, cell towers shall be limited to self-supporting towers. Applications for cell tower approval shall include written evidence from the Range that the location, height and operation of the tower does not adversely affect the operations and mission of the Range prior to application to Lake County. Staff worked with the Range to ensure compatibility with the MOA and received correspondence stating the United States Navy is not opposed to the proposed tower.

B. Effect on Adjacent Properties.

1. The proposed conditional use will not have an undue adverse effect upon nearby property.

Undue adverse effects are not anticipated as the proposed tower will satisfy setbacks to adjacent parcels and adjacent tower separation distances. To further lessen any potential adverse effects, LDR Section 3.13.03(A), *Structural Design*, requires the tower to collapse within the property lot lines on which the communication tower is located. Should the request be approved, the Applicant will need to demonstrate proof that the tower can self-collapse within the parent parcel boundaries with submittal of the development application.

2. The proposed conditional use is compatible with the existing or planned character of the neighborhood in which it would be located.

The proposed camouflaged communications tower will be located on parcel with an existing tree canopy. The monopine style tower is designed to blend in with the environment.

All reasonable steps have been taken to minimize any adverse effect of the proposed conditional use on the immediate vicinity through design, landscaping, and screening.

To minimize potential visual adverse effects, the tower is designed as a camouflaged monopine type tower (Attachment "D").

3. The proposed conditional use will be constructed, arranged, and operated so as not to interfere with the development of neighboring property, in accordance with applicable district regulations.

The tower will be located to reduce potential visual impact on the adjacent properties. The proposed camouflaged tower will be located in proximity to existing tree canopies. The proposed Conditional Use Permit is not anticipated to adversely affect the development of neighboring property.

C. Adequacy of Public Facilities.

The proposed conditional use will be served by adequate public facilities including but not limited to police, roads, sewage facilities, water supply, drainage, solid waste, parks and recreation, schools, and fire and emergency medical facilities. Levels of service established by the Comprehensive Plan Shall be considered.

Parks

The proposed request is not anticipated to adversely impact parks.

Schools

The proposed request is not anticipated to adversely impact schools.

Solid Waste

The proposed request is not anticipated to adversely impact solid waste capacities or levels of service.

Transportation

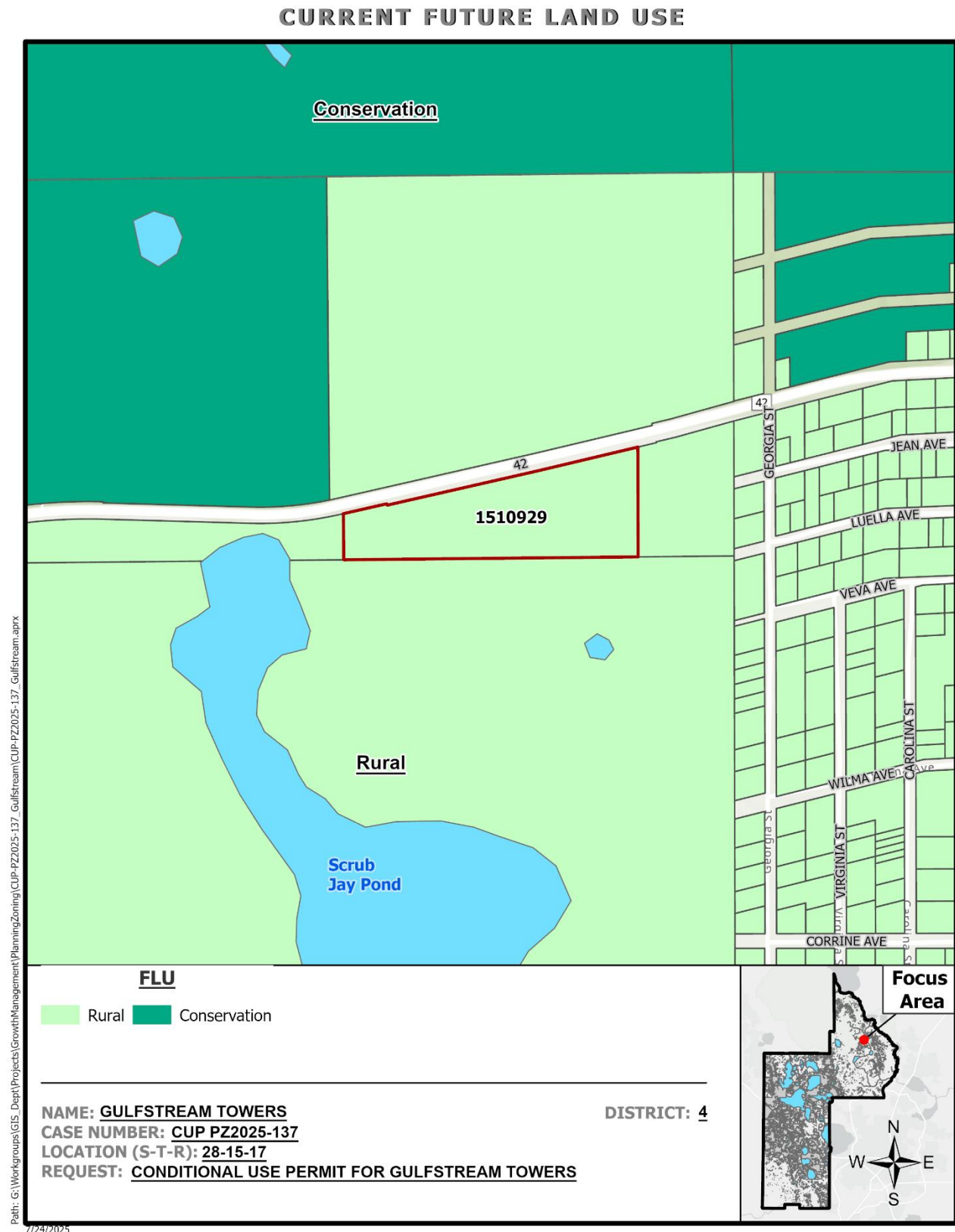
The proposed request is not anticipated to adversely impact transportation levels of service.

D. Adequacy of Fire Protection.

The Applicant shall obtain from the Lake County Office of Fire Rescue written confirmation, or has otherwise demonstrated by substantial credible evidence, that water supply, evacuation facilities, and emergency access are satisfactory to provide adequate fire protection.

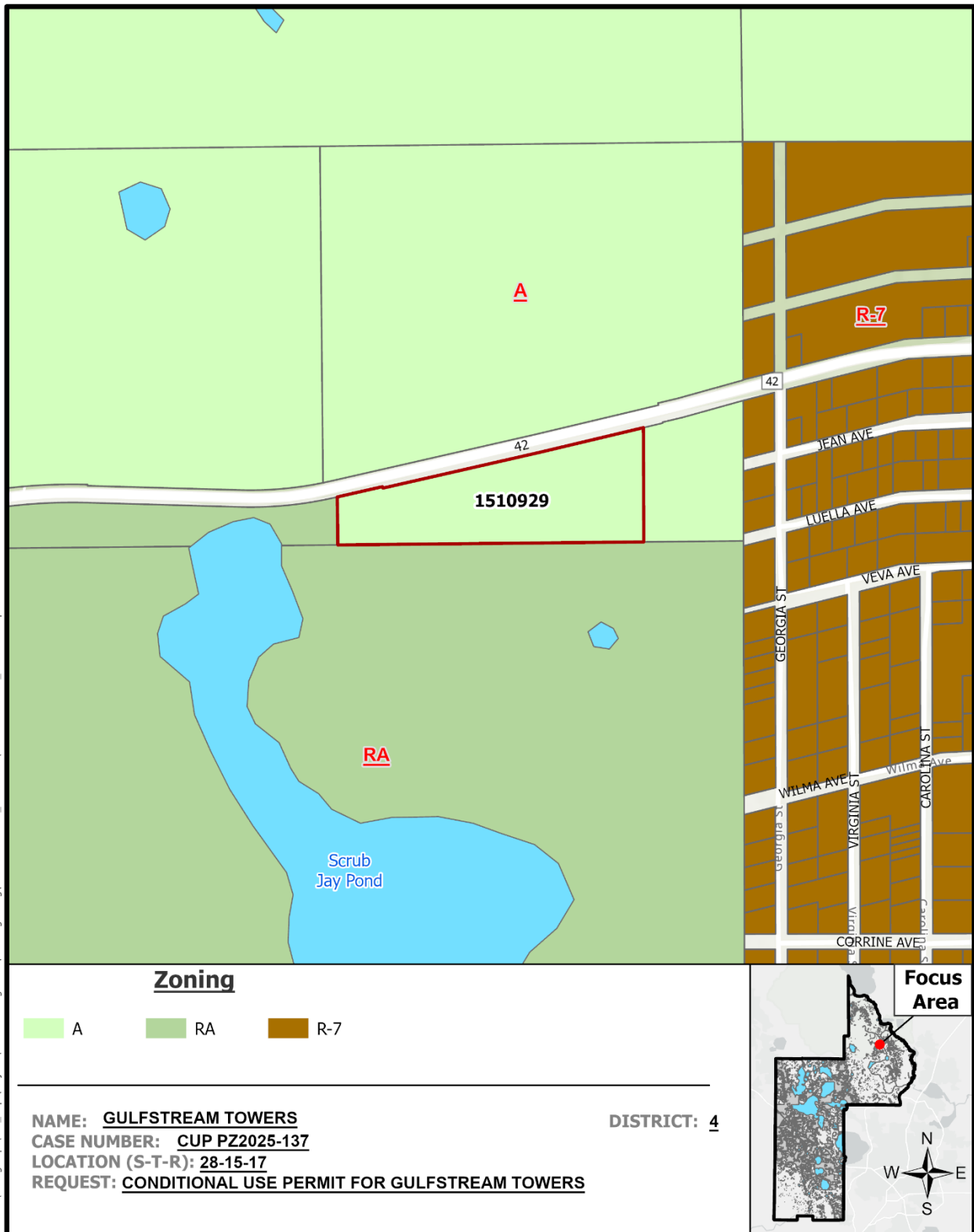
Lake County Fire Rescue Station 13, located at 252520 County Road 42, Paisley, is less than three (3) miles from the subject property. Fire protection, water supply, and emergency access will be addressed during the site plan review process, if the conditional use permit is approved.

Attachment "A" – Future Land Use Category



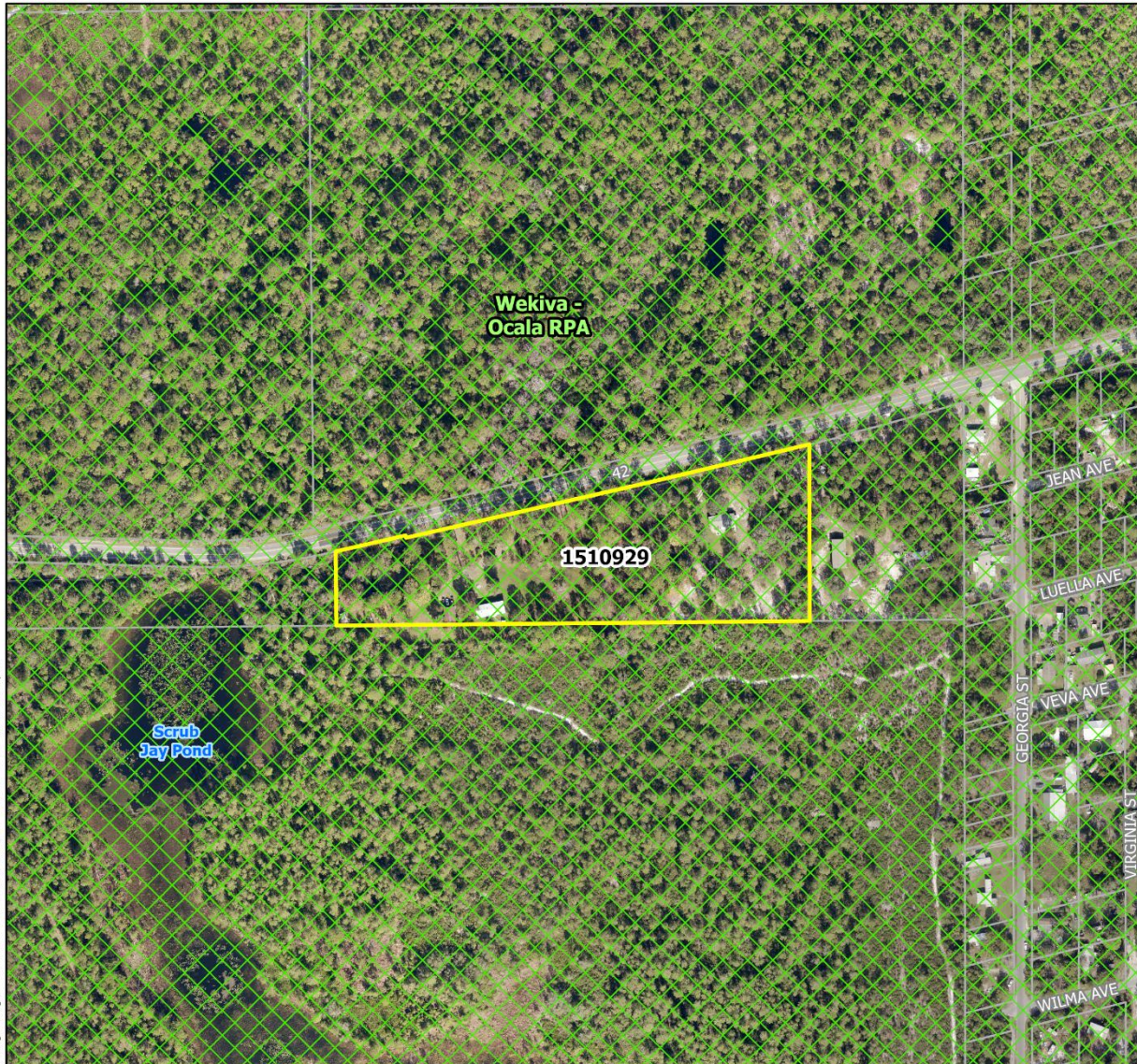
Attachment “B” – Zoning District Map

CURRENT ZONING

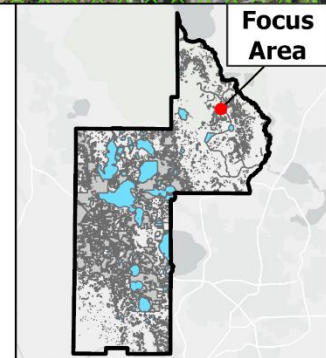


Attachment “C” – Overlay District

CUP PZ2025-137 Gulfstream Towers

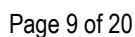


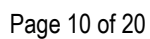
Conditional Use Permit for Gulfstream Towers



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7/24/2025





Attachment “E” – Project Narrative (1 of 3)

GULFSTREAM TOWERS LLC

FL242 Paisley

Project Narrative

Gulfstream Towers, LLC proposes the construction of a 180’ Monopine Telecommunications Tower on property located at 27402 County Road 42, Paisley, FL. The parent parcel is owned by Norman T. and Pamela S. Lindemann and is improved with two single family residences. The parent parcel is located on the south side of CR 42, between SR19 and SR44. The subject property has a FLU designation of Rural and is Zoned Agriculture. Telecommunications Towers are allowed as a conditional use under the current zoning. The tower proposes a camouflage design as a Monopine.

The Site plan submitted with the application demonstrates that the Proposed Telecommunications Tower meets all performance criteria for telecommunications towers set forth in Section 3.13.00 of the Lake County Land Development Regulations with the exception of the following:

Section 3.13.09(B))(1) which requires that towers be centered within the boundaries of the Property recognized as the parent parcel on the official zoning Map.

Gulfstream is requesting waiver relief from this requirement. The Site plan establishes that the center of the property lies within an existing drainage swale. The tower is proposed to be placed 29’ 7” to the south, as close as possible to the center of the property and allowing for the tower compound to be located outside of the drainage swale. Gulfstream seeks this waiver pursuant to Section 14.03.05(B).

Set forth below are the Conditional Use Criteria and the analysis as to how the criteria are being met, in bold text.

Attachment “E” – Project Narrative (2 of 3)

A. Consistency with the Comprehensive Plan and Local Code. The proposed conditional use is in compliance with all requirements, and is consistent with the general purpose, goals, objectives, and standards of the Comprehensive Plan, the Lake County Code, and is in compliance with all additional standards imposed on it by the particular provisions of these regulations authorizing such use.

The request is consistent with the Comprehensive Plan and, with a waiver from tower centering, will meet all requirements for towers set forth in the LDRs.

B. Effect on Adjacent Properties.

1. The proposed conditional use will not have an undue adverse effect upon nearby property.
2. The proposed conditional use is compatible with the existing or planned character of the neighborhood in which it would be located.
3. All reasonable steps have been taken to minimize any adverse effect of the proposed conditional use on the immediate vicinity through design, landscaping, and screening.
4. The proposed conditional use will be constructed, arranged, and operated so as not to interfere with the development of neighboring property, in accordance with applicable district regulations.

The Proposed Telecommunications Tower is being proposed in a rural area with the Ocala National Forest being the predominant land use in the area. The Tower is proposed as a Monopine to minimize the visual impact to the residential uses to the east.

C. Adequacy of Public Facilities. The proposed conditional use will be served by adequate public facilities including but not limited to police, roads, sewage facilities, water supply, drainage, solid waste, parks and

Attachment “E” – Project Narrative (3 of 3)

recreation, schools, and fire and emergency medical facilities. Levels of service established by the Comprehensive Plan Shall be considered.

The proposed telecommunications tower is an unmanned facility and creates no demand for public facilities.

D. Adequacy of Fire Protection. The applicant Shall obtain from the Lake County Emergency Services Division written confirmation, or has otherwise demonstrated by substantial credible evidence, that water supply, evacuation facilities, and emergency access are satisfactory to provide adequate fire protection.

The proposed telecommunications tower will rely upon the same fire protection that services the existing residential uses. Gulfstream will comply with all emergency access requirements at time of Site Plan approval.

Attachment “F” – United States Navy (1 of 2)

From: Mcmanus, Mark W CIV USN NAVFAC SE JAX FL (USA)
<mark.w.mcmanus3.civ@us.navy.mil>
Sent: Monday, June 9, 2025 12:21 PM
To: Frye, James
Cc: Estrella, Miguel D LCDR USN FACSFAC JACKSONVILLE (USA); Doyle, Michael D CIV (USA)
Subject: RE: Review Request | Gulfstream Towers FL242 CUP (AR 6036) - PZ2025-137 | AK 1510929

James,

The Navy does not have an objection with this tower.

The Navy does request that the tower be lit with NVG compatible lighting as is sits at the boundary of Restricted Area 2910.

We have flight crews that fly in this area often and the NVG compatible lighting will provide a measure of safety for our flight crews.

Please let me know if Lake County or the developer have any questions.

Very respectfully,
Mark

Mark McManus
NAS JAX and Naval Station Mayport CPLO
Office: 904-542-3737
Cell: 904-762-5997
mark.w.mcmanus3.civ@us.navy.mil

Attachment “F” – United States Navy (2 of 2)

From: Mcmanus, Mark W CIV USN NAVFAC SE JAX FL (USA)
<mark.w.mcmanus3.civ@us.navy.mil>
Sent: Wednesday, July 9, 2025 4:27 PM
To: Frye, James; Sneed, Ashley M CIV USN NAVSUPACT ORL FL (USA)
Cc: Barron, Janie
Subject: RE: Review Request | Submittal 2 - Gulfstream Towers FL242 CUP (AR 6036) - PZ2025-137 | AK 1510929

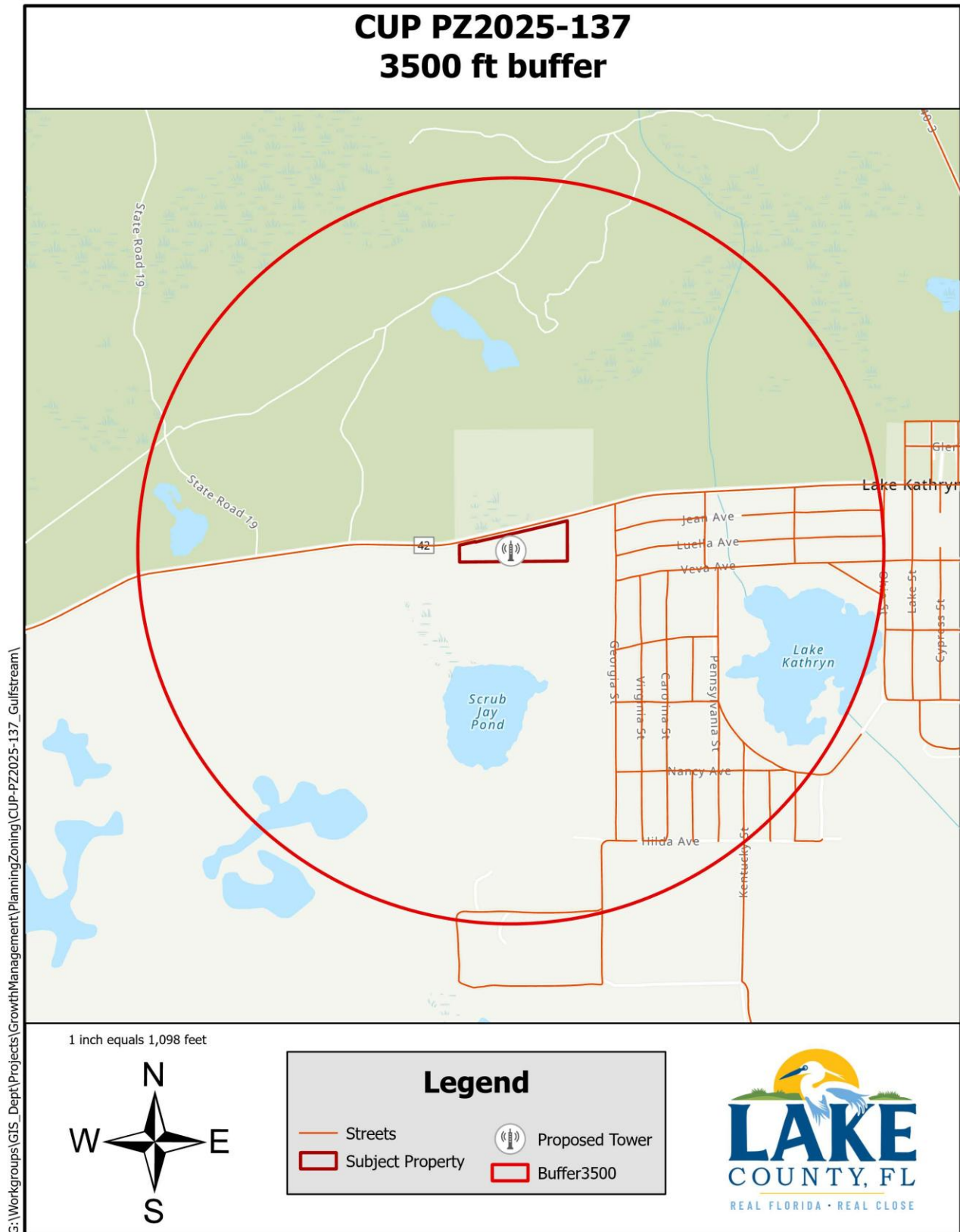
As the tower is located inside the MOA and we have aircrews flying Night Vision Goggles routinely in the area, we are requesting the tower be equipped with NVG-compatible lighting. Helicopters may be flying below 180 feet above ground level, which, if this tower is unlit poses a safety of flight issue.

V/R
Mark

Mark McManus
NAS JAX and Naval Station Mayport CPLO
Office: 904-542-3737
Cell: 904-762-5997
mark.w.mcmanus3.civ@us.navy.mil

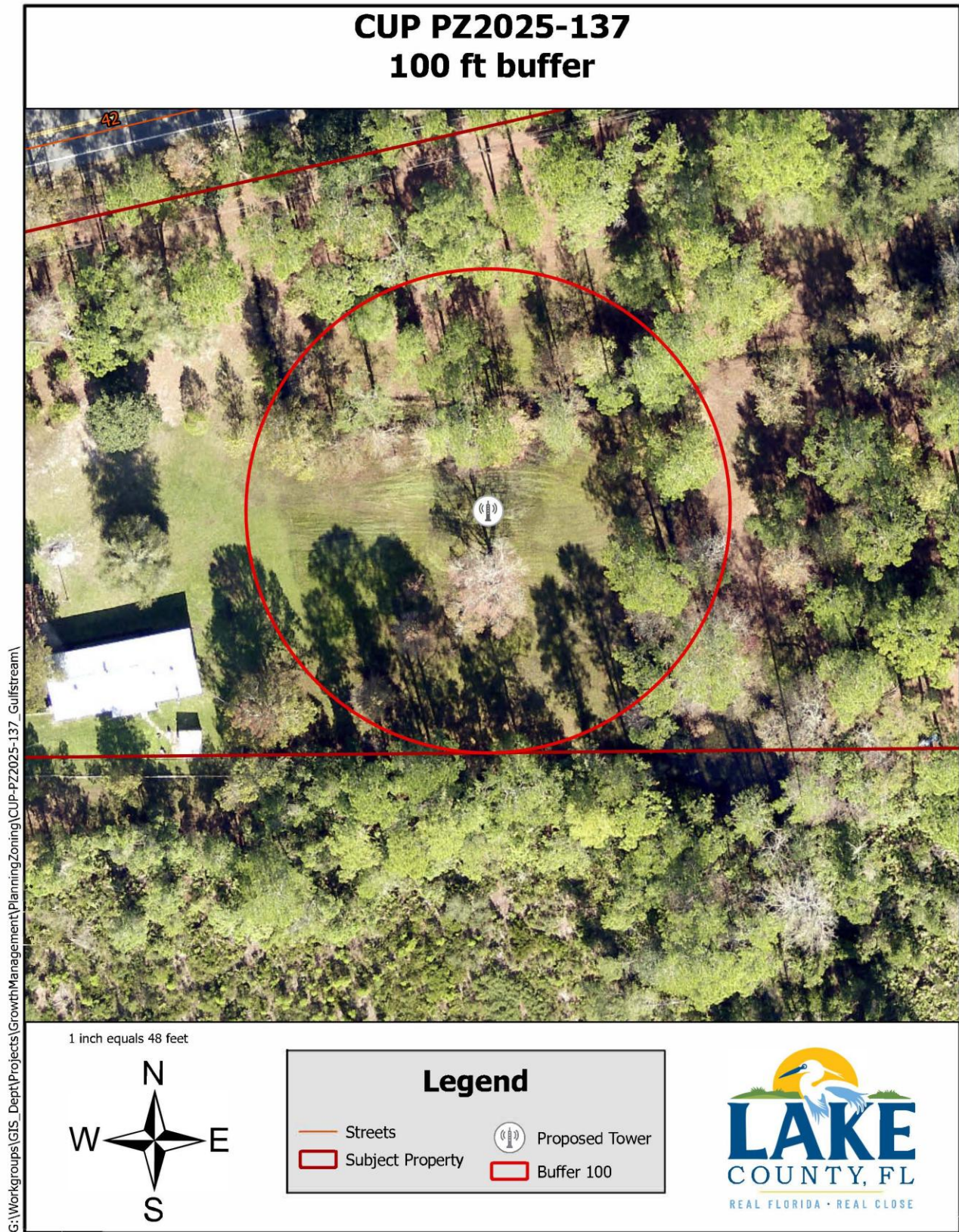


Attachment "G" – Separation Tower Map

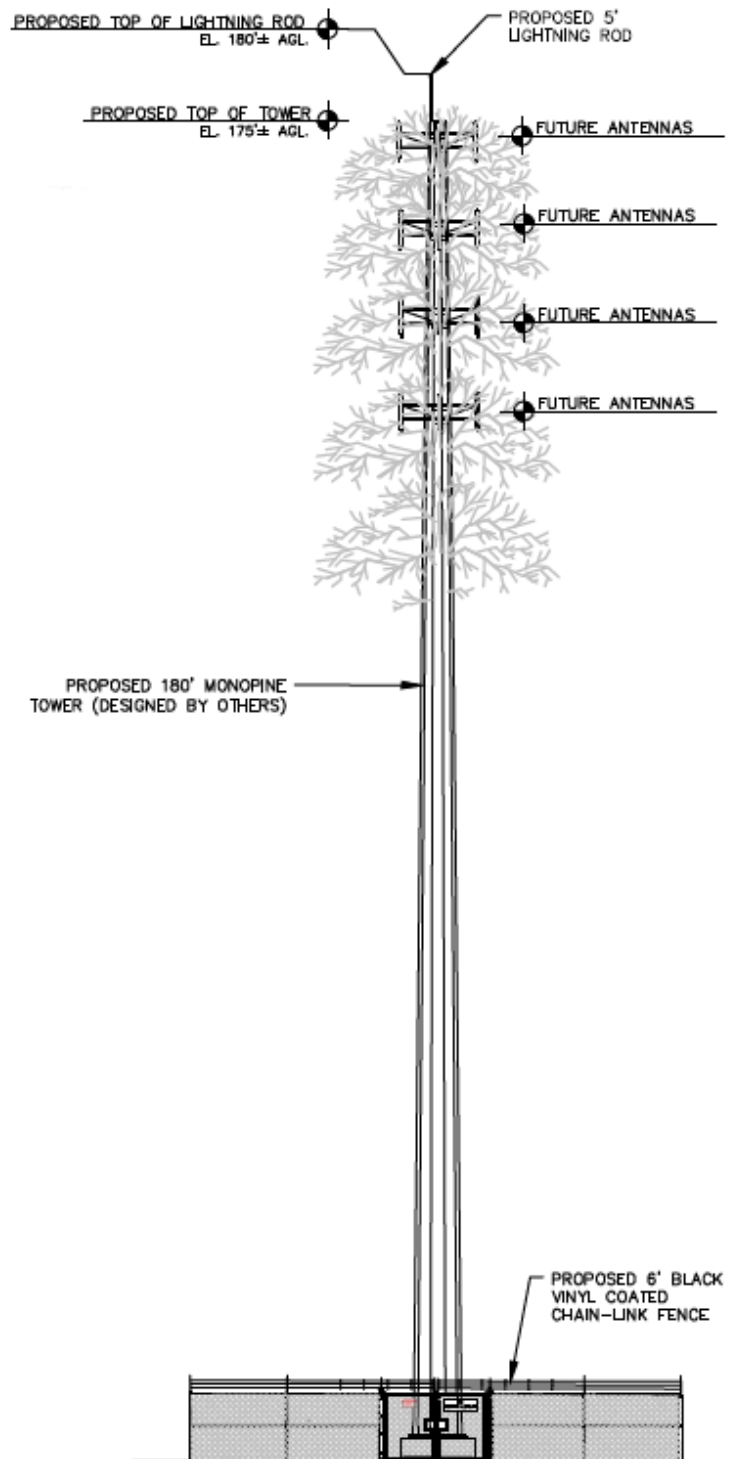


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Aerial Map – 100-Foot Radius



Tower Elevation



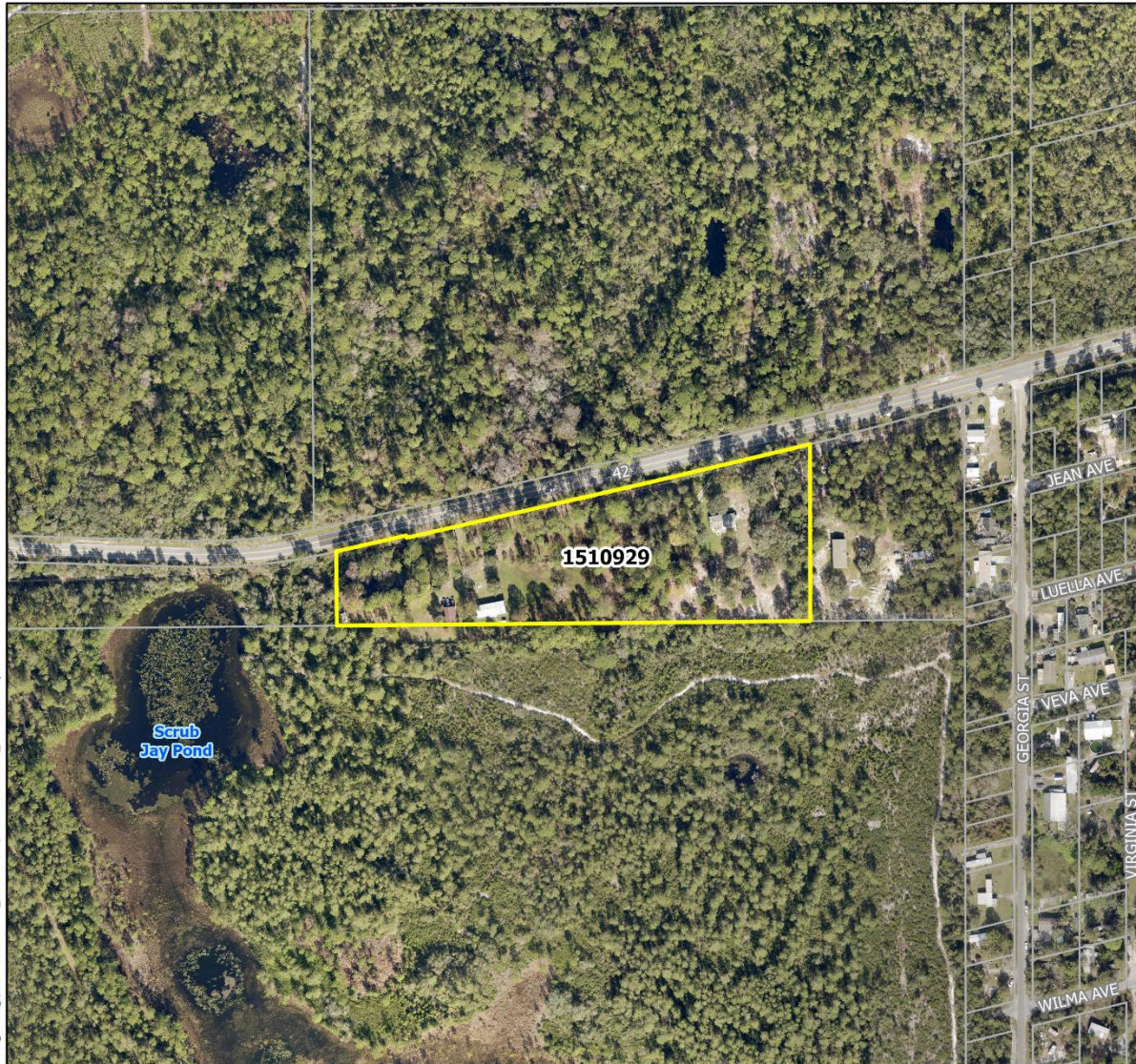
TOWER ELEVATION

Map of Subject Property

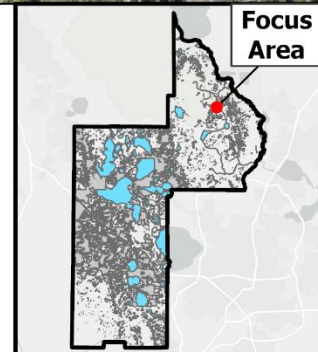


Aerial of Subject Property

CUP PZ2025-137
Gulfstream Towers



Conditional Use Permit for Gulfstream Towers



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WHEREAS, Mary D. Solik, Esquire (the “Applicant”) submitted a Conditional Use Permit application on behalf of Norman T. Lindemann and Pamela S. Lindemann (the “Owners”) to allow a 180-foot monopine communications tower on Agriculture (A) District zoned property; and

WHEREAS, the subject property is located within the Rural Future Land Use Category (FLUC) as shown on the Lake County Comprehensive Plan Future Land Use Map (FLUM); and

WHEREAS, this Conditional Use Permit was reviewed by the Lake County Planning & Zoning Board on the 3rd day of September 2025, and by the Board of County Commissioners of Lake County, Florida, on the 7th day of October 2025; and

ction 1. Conditional Use Permit. Permission is hereby granted for operation of a wireless communication tower as a Conditional Use within the Agriculture (A) District Zoning District. All land uses must be generally consistent with the Concept Plan as shown in Exhibit “B” of this Ordinance. To the extent that there are conflicts between the Conceptual Plan and this Ordinance, this Ordinance will take precedence.

A. Waiver. A waiver to Land Development Regulations (LDR) Section 3.13.09(B)(1) to allow the proposed monopine communications tower to be constructed off-center is hereby granted as the center of the property contains a drainage swale. The Tower shall be placed 29'7" to the south, as close as possible to the center of the property and allowing for the Tower Compound to be located outside the drainage swale.

Page 1 of 8

1. Wireless communications tower (monopine), 180-feet maximum above ground level to be located on the portion of the property described in **Exhibit A – Lease Parcel**
2. Accessory uses directly associated with the above use may be approved by the County Manager or designee. Any other use of the site will require approval of an amendment of this Ordinance by the Board of County Commissioners.

C. Specific Conditions.

1. Site Plan Required: The developer shall submit a development application for site plan of the communication tower facility.
2. Illumination: Due to the site being located within the Pinecastle Range Complex Military Operations Area (MOA), the communications tower facility shall be illuminated with Night Vision Goggle (NVG) Compatible Lighting and as required by the LDR, as amended.
3. Parking: Parking surfaces may be grass or other pervious material.
4. Structural Design: The structural design of the tower shall be in accordance with the LDR, as amended.
5. Camouflaging of the Tower: The Tower camouflage shall be maintained throughout the life of the tower, including any installed antenna and supporting equipment.

D. Tower, and Equipment Safety Facility Setbacks.

1. The communications tower facility and associated uses shall meet all applicable setbacks as set forth in the LDR, as amended unless stated within the above waivers.
2. The communications tower facility must be constructed as a self-collapsing tower, so that in the event a communications tower falls, it shall collapse only within the property lines of the lot on which the communications tower is located. An engineer licensed in the State of Florida must provide a certification and documentation that this requirement has been met. See LDR Section 3.13.03(A), as amended.

E. Environmental Requirements.

1. An environmental assessment no more than six (6) months old will be required at the time of the Site Plan submittal. The environmental assessment will need to indicate the presence of vegetation, soils, threatened and endangered species that may exist on the site. Any State permitting or mitigation will be required before development can commence.
2. Proposed structures must maintain a minimum setback of 50 feet from the jurisdictional wetland line (JWL).
3. Environmental resources shall be protected in accordance with the Comprehensive Plan and Land Development Regulations (LDR), as amended.

F. Fencing and Screening. A chain-link fence or wall not less than six (6) feet from finished grade shall be provided around each communications tower and support facilities in accordance with the LDR, as amended.

G. Open Space, Impervious Surface, Floor Area Ratio, and Building Height. Open space, impervious surface ratio, floor area ratio, and building height shall be in accordance with the Comprehensive Plan, and LDR, as amended.

1 **H. Landscaping, Buffering, and Screening.** Landscaping, buffering, and screening shall be in
2 accordance with the LDR, as amended.

3 **I. Lighting.** Exterior lighting must be in accordance with the Lake County LDR, as amended, and
4 consistent with Dark-Sky Principles. Except as required above in Subsection C. Specific
5 Conditions.

6 **J. Noise.** Compliance must be in accordance with the LDR, as amended.

7 **K. Parking Requirements.** Off-street parking must be provided in accordance with the LDR, as
8 amended.

9 **L. Signage.** All signage must be in accordance with the LDR, as amended.

10 **M. Floodplain and Stormwater Management.**

11 1. The stormwater management system must be designed in accordance with all applicable
12 Lake County and St. Johns River Water Management District (SJRWMD) requirements.

13 2. The developer shall be responsible for any flood studies required for developing the site and
14 comply with FEMA, Comprehensive Plan and Land Development Regulations, as amended.
15 Any development within the floodplain as identified on the FEMA maps will require
16 compensating storage.

17 **N. Transportation Improvements.** All access management improvements shall be in accordance
18 with the Comprehensive Plan and Land Development Regulations (LDR), as amended.

19 **O. Concurrency Management Requirements.** Any development must comply with the Lake
20 County Concurrency Management System, as amended.

21 **P. Development Review and Approval.** Prior to the issuance of any permits, the developer shall
22 be required to submit a development application generally consistent with EXHIBIT "B" -
23 Conceptual Plan for review and approval in accordance with the Comprehensive Plan and LDR,
24 as amended.

25 **Q. Future Amendments to Statutes, Code, Plans, or Regulations.** The specific references in
26 this Ordinance to the Florida Statutes, Florida Administrative Code, Lake County Comprehensive
27 Plan, and LDR will include any future amendments to the Statutes, Code, Plans, or Regulations,
28 as applicable.

29 **Section 3. Conditions.**

30 **A.** In the event of any breach in any of the terms or conditions of this permit or any default or failure
31 of the Owner or successor to: Fulfill development in substantial accordance with the conceptual
32 plan as submitted to the Planning & Zoning Board and the Board of County Commissioners;
33 comply with the codes of the governmental agencies having lawful and appropriate jurisdiction;
34 or comply with any of the terms of the Conditional Use Permit; or if this CUP is found to become
35 a nuisance or safety hazard, the permit may be revoked after due Public Hearing before the
36 Planning & Zoning Board and the Board of County Commissioners.

37 **B.** This CUP will inure to the benefit of and will constitute a covenant running with the land; and the
38 purpose, terms, and conditions contained in this Ordinance will be binding upon the Owner,
39 developer and/or Applicant, or any successor and her interest.

C. The Lake County Code Enforcement Special Master will have authority to enforce the terms and conditions set forth in this ordinance and to recommend that the ordinance be revoked.

D. This use shall be inspected by the Office of Code Enforcement annually to ensure compliance with the conditions of this CUP and the approved site plan. An annual inspection fee will be assessed. If an emergency inspection is necessary during non-operating hours, a fee shall also be assessed.

Section 4. Severability. If any section, sentence, clause or phrase of this Ordinance is held to be invalid or unconstitutional by any court of competent jurisdiction, the holding will in no way affect the validity of the remaining portions of this Ordinance.

Section 5. Filing with the Department of State. The clerk is hereby directed to send a copy of this Ordinance to the Secretary of State for the State of Florida in accordance with Section 125.66, Florida Statutes.

Section 6. Effective Date. This Ordinance shall become effective upon recordation in the public records of Lake County, Florida. The Applicant shall be responsible for all recording fees.

ENACTED this _____ day of _____, 2025.

FILED with the Secretary of State _____, 2025.

EFFECTIVE _____, 2025.

**BOARD OF COUNTY COMMISSIONERS
LAKE COUNTY, FLORIDA**

LESLIE CAMPIONE, CHAIRMAN

ATTEST:

**GARY J. COONEY, CLERK OF THE
BOARD OF COUNTY COMMISSIONERS
LAKE COUNTY, FLORIDA**

APPROVED AS TO FORM AND LEGALITY:

MELANIE MARSH, COUNTY ATTORNEY

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Exhibit "A" – Legal Description Continued

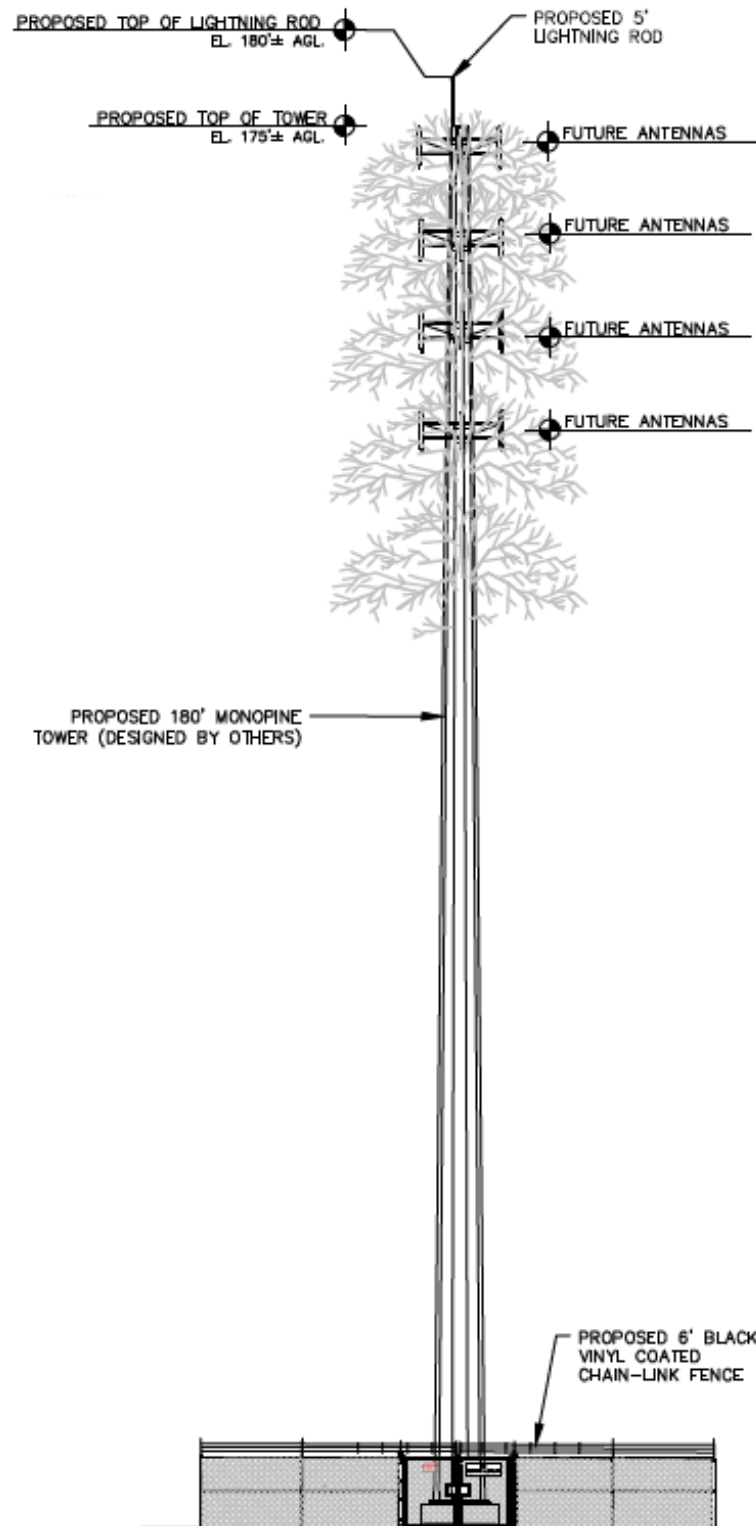


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Exhibit "B" – Concept Plan Continued



TOWER ELEVATION