

Inner Loop Working Group

Ensuring Safety & Integrity in Community Development Impacting the 17 mile Loop Connecting Alico, Corkscrew & Ben Hill Griffin in Estero, FL

July 26, 2020

Lee County Local Planning Agency

Sent via email

Mr. Raymond Blacksmith

Mr. Dustin Gardner

Mr. James Ink

Ms. Alicia Olivo

Mr. Don Schrotenboer

Mr. Stan Stouder

Mr. Henry Zuba

RE: Small Brothers Commercial CPA2019-00009

Dear Lee County LPA:

The Inner Loop Working Group objects to the recommendation that this Comprehensive Plan Amendment be advanced to State Agency for review on all procedural grounds, including omission of relevant information presented to decision makers and put forth by county leadership that adversely impacts DR / GR considerations and the interests of the residents of Lee County.

Flows of water in Florida are legally protected from being altered. The Inner Loop Working Group is concerned about the flow of water in the rainy season and during extreme

precipitation events that historically exits from residential areas off Devore Lane and moves south and then east/southeast across Corkscrew Road being impeded by this development. This parcel presented for development has previously been identified as a wetland and conservation lands with a priority level 2 designation in the award winning and groundbreaking *Prospects for Southeast Lee County Dover-Kohl* report. Further, the subject property is part of a significant corridor for wildlife following the flow-way that sends water south toward the Imperial River and is rich in bio-diversity and seasonal variability.

This land and the properties around it serve a vital ecological function, obvious even from a car. The ditches in this area are full of wetland plants, such as Alligator flag that remove nutrients from run-off and prevent downstream blue-algae events in the Estero River and Estero Bay. This parcel is the cross-roads that it critical in providing a connection that sends some water moving further south to the Imperial River through the DR / GR, having time to be filtered and cleaned up by our native wetlands.

Several figures from the *Comprehensive Hydrological Study of the Lee County Southeastern Density Reduction / Groundwater Resource (DR/GR) Area* illustrate the critical role this parcel plays in the ecological connectedness of the Estero and Imperial watersheds, see addendum. Further these figures reveal the hydrological complexity of flow-ways interacting with mining lakes and the structures used to manage this flow that impacts long-standing residential areas.

Additionally, the Inner Loop group is concerned that infrastructure is inadequate on over-capacity Corkscrew Road and also inadequate and incompatible with industrial, heavy trucks frequenting the mining corridor on Alico. Increased traffic complexity along with the overage from Corkscrew Road gridlock puts families that navigate these roadways at increased risk. The inevitable accidents are likely to be very serious due to commuting families colliding with accelerating and decelerating heavy trucks on crowded, out dated one lane roads.

Lee County has not provided safe roads for new developments approved on Corkscrew Road. Neighboring communities, long-standing residents and stakeholders, such as commercial businesses, mining operations and FGCU satellites on Alico, Mallard and Green Meadow are also impacted by overflow traffic and subjected to daily unsafe commutes.

In the current economic climate, there is no need for additional brick and mortar commercial spaces locally, especially one requiring a Comprehensive Plan Amendment. Consumer

behavior has changed and large-scale residential developments, such as the many on Corkscrew Road, have an opportunity to offer delivery hubs or grocery and package drop off centers on site as an added amenity to the gyms and clubhouses they promote. Changes in the way consumers shop and the services offered by homeowner associates have a new opportunity to align and better serve residents, while eliminating some trips from urban sprawl locations on dangerous, over-capacity roadways. Who better to be an example to the broader community than those living in environmentally enhanced communities?

The Inner Loop Group implores community leaders, civil engineers, citizens and developers to work together in the best interest of the community at large. Please be innovative in solving the problems of inadequate infrastructure, actively develop and advance projects that promote and encourage changes in human behavior that mitigate human impacts, especially on environmentally sensitive DR / GR lands. This parcel serves multiple vital hydrologic functions of flood protection, recharging our aquifers while removing nutrient pollution and protecting our water quality.

Overlooking the anthropogenic effects of human impact on water quality will result in blue-green algae blooms and toxic water that will cost our community billions in lost revenue and compromise health and safety of Lee County citizens. It is unnecessary to build a Publix within 6 miles of a Publix. There is no environmental enhancement that a commercial development could utilize to offset the loss of this vital connection to the Imperial and Estero Rivers.

Join us in ensuring that the innovation and smart developments that include environmental enhancements to natural systems do not result in the destruction of the very systems they mimic. As such, this Comprehensive Amendment does not reflect the values of. protect the lives or promote the interests of the Southeast Lee County citizenry.

Sincerely,

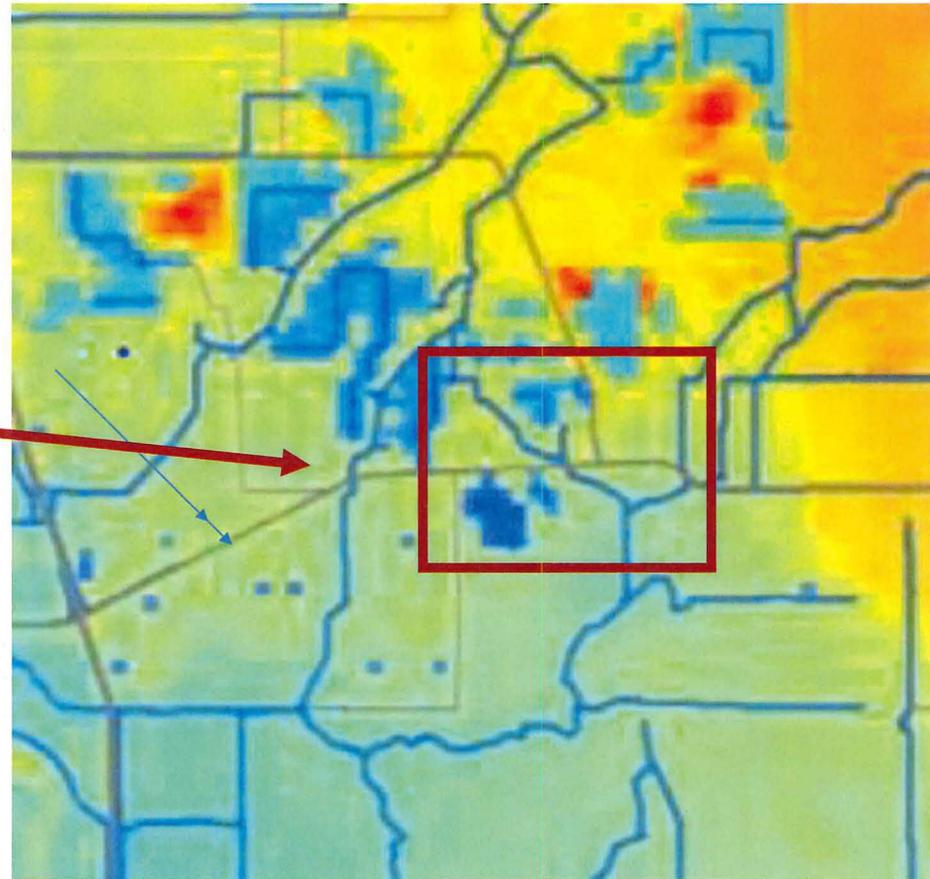
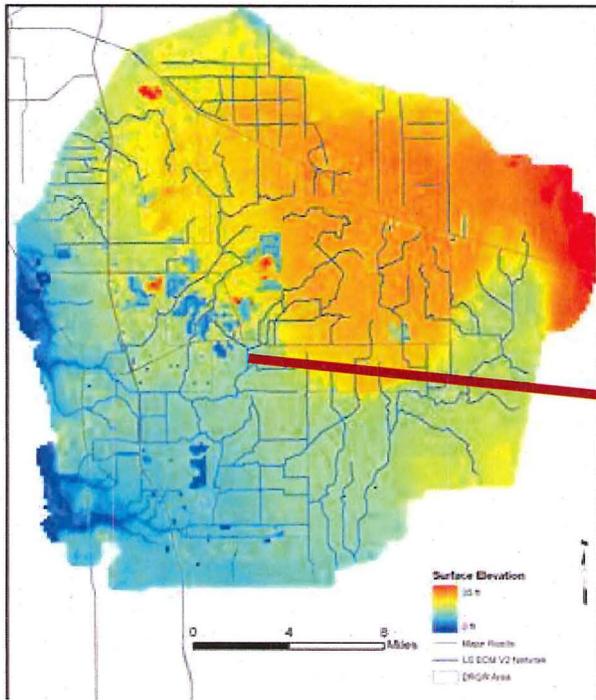
Inner Loop Working Group

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Figure 9: Topography Local Scale Environmental Conditions Model



Note: Flow and movement from mining lakes to east/south east toward subject property.

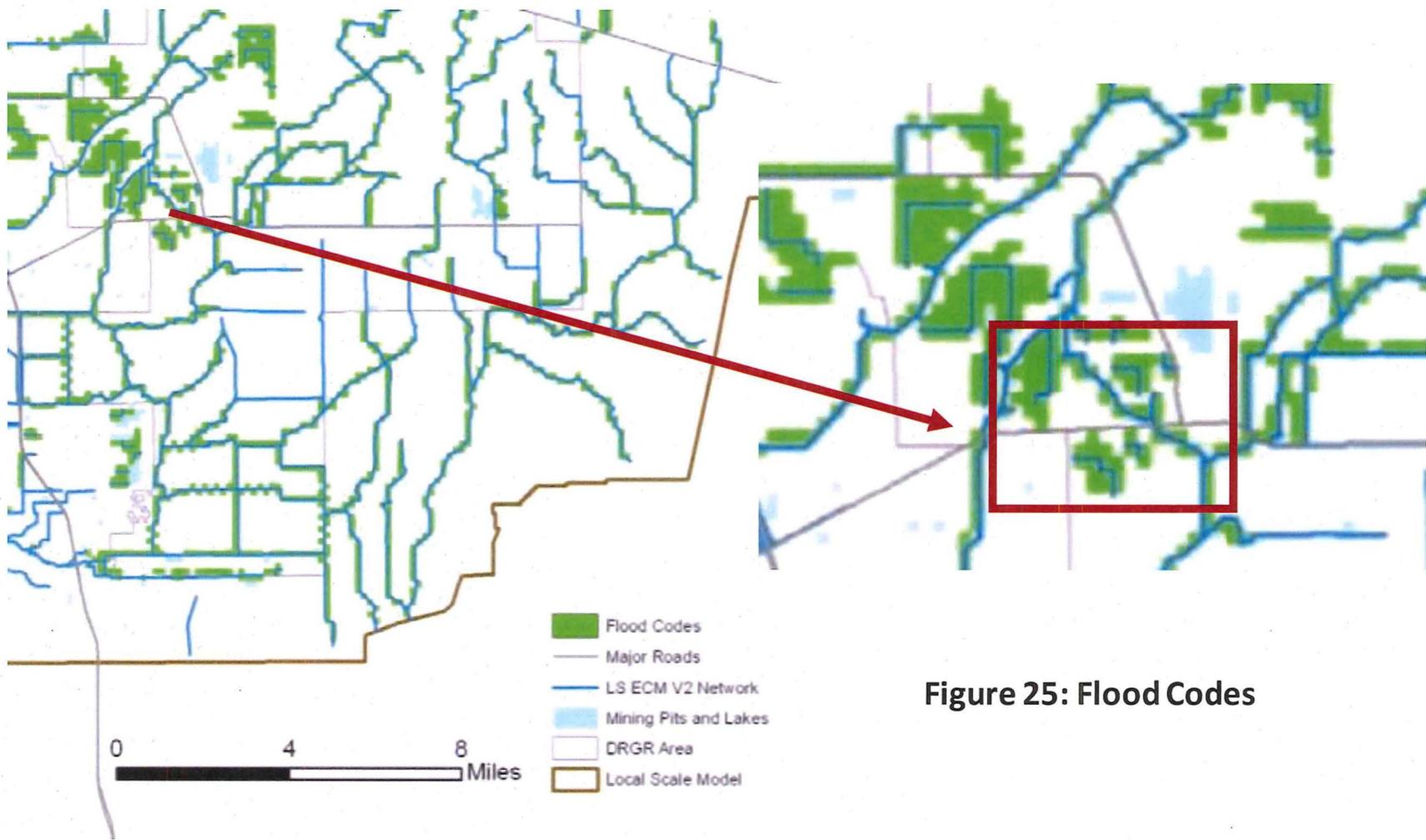
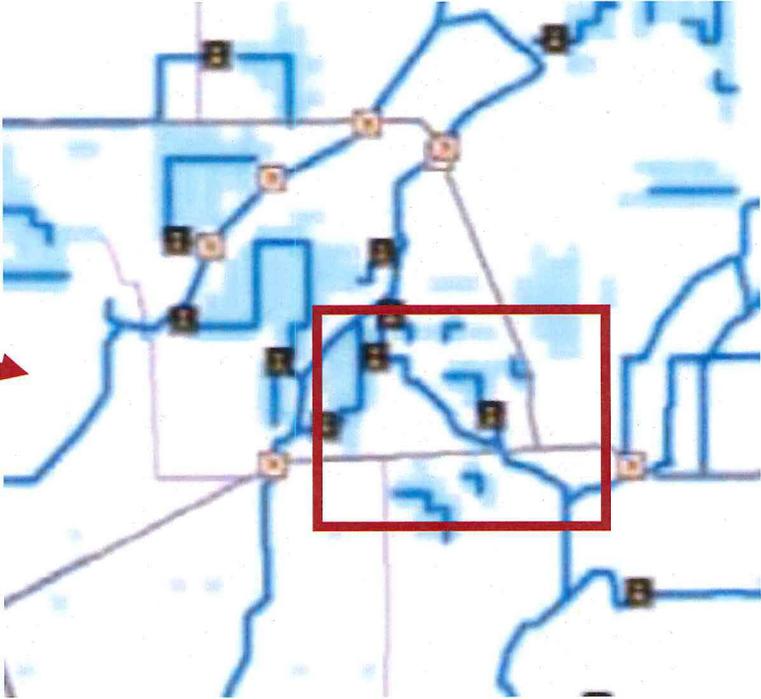
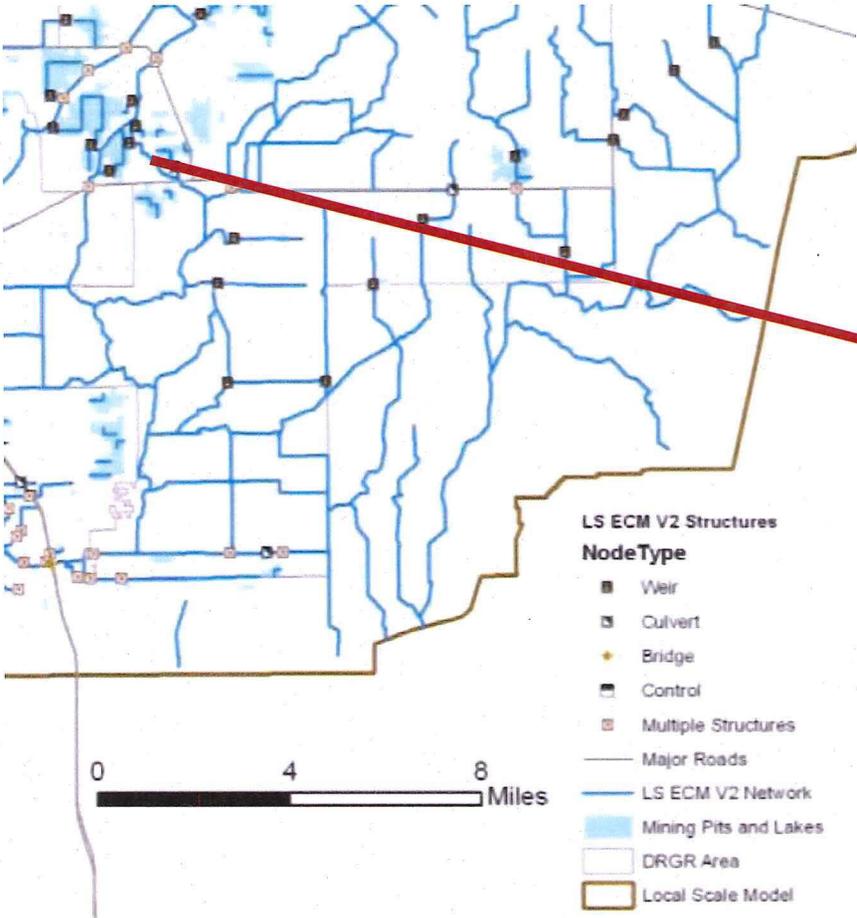


Figure 25: Flood Codes

Figure 24: Networks & Structures



Note: Many weirs and culverts in use in this area to manage flow of water.

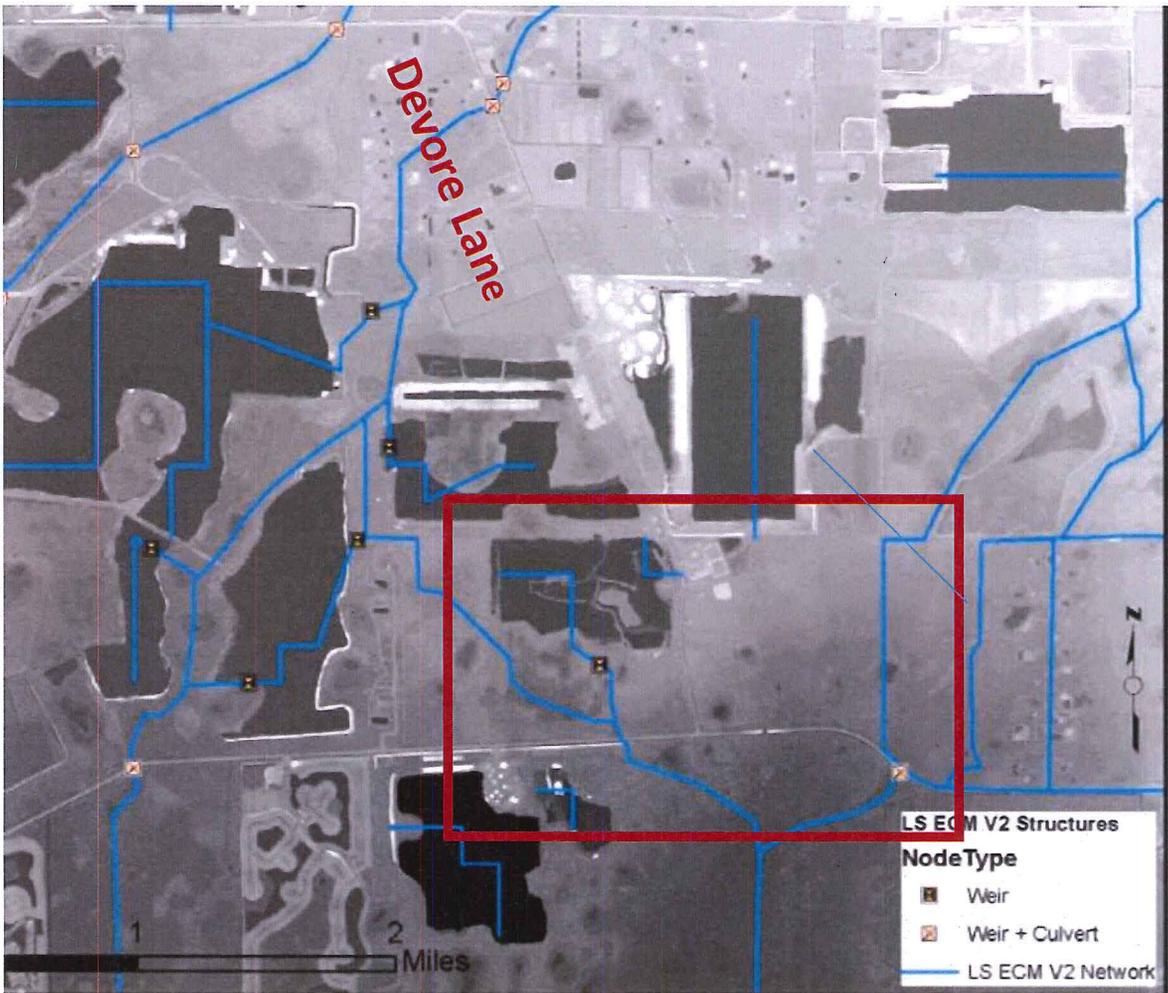


Figure 27: Mine Drainage

Note: Flow and movement from mining lakes to east/south east toward subject property.

Note: Darker gray represents lower elevation at subject property.