



Consolidated Review Comments

Record Number: [CPA2025-00006](#)

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Department of Community Development
Planning
P.O. Box 398
Fort Myers, FL 33902

Report Date: 08/05/2025

Record Type: Comprehensive Plan Amendment

Address: 14800 ALICO RD, FORT MYERS, FL 33913

Project Name: Alico Tradeport

Record Description: A request to amend the text in Goal 33 to allow for the development of industrial uses when developed in complimentary locations within Southeast Lee County.

Staff has reviewed the application submittal for the Lee Plan Amendment, CPA2025-00006, originally received 2025-07-01 00:00:00. Planning Staff finds that the application materials are insufficient and further information is needed. A public hearing date will not be scheduled until a complete application is submitted. If you do not provide the requested supplements of corrections within 90 days of this letter, this application will be considered withdrawn. Please feel free to contact Planning at (239) 533-8585 if you have any questions.

GENERAL COMMENTS:

The information below is an advisory summary of any significant issues identified for the project.

<u>Corrections</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
<u>Environmental Review</u>				
Yes	Please provide analysis of Lee Plan policies 33.1.7, 60.1.1, 60.1.2, 60.4.3, 123.1.5, 123.2.10, 123.4.1, 123.11.4, 123.12.1, 125.1.2, 125.1.4, 126.1.1, 126.1.4, and 127.1.1.	Nicholas DeFilippo	Open	1
Yes	Please address how proposed text amendment impacts active and passive agricultural operations in excess of 100 acres - Policy 1.6.7.	Nicholas DeFilippo	Open	2
Yes	How will existing acreage subdivisions as shown on Map 2-D be protected from adverse external impacts? - Lee Plan policy 33.2.1.	Nicholas DeFilippo	Open	3
Yes	Please define Alico Road Extension and Alico Road Connector/Extension used in the proposed text amendment.	Nicholas DeFilippo	Open	4
Yes	Tradeport FLU allows for stand-alone retail commercial if preservation incentives are reached as outlined in Policy 1.1.13. Please provide analysis of potential commercial uses within Southeast Lee County as a result of the requested text amendment.	Nicholas DeFilippo	Open	5
Yes	How will uses be compatible with Southeast Lee County? Commercial uses are limited elsewhere in Goal 33, "must not include auto parts stores, lawn and garden supply stores, fuel pump stations, drycleaners (on-site), or any other use that is not compatible with protecting Southeast Lee County's environment". The uses allowed in the Tradeport FLU category include potential intensive high-risk uses. Staff has concerns that potential uses within Tradeport FLU are not compatible with objectives of Southeast Lee County Community Planning Area and DR/GR FLU category.	Nicholas DeFilippo	Open	6

<u>Corrections</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
Yes	Please provide analysis examining potential impacts on public supply wellfields as a result of eligible properties developing in accordance with the proposed text amendment. How many eligible properties are located within Wellfield Protection Zones? Uses have been restricted or heavily regulated based on proximity to wellfields. How does the proposed text amendment account for protection of groundwater resources? The text amendment has potential to allow for uses Staff will not support based on proximity to wellfields.	Nicholas DeFilippo	Open	7
Yes	Please provide an integrated surface and groundwater model to determine impacts of all eligible properties developing in accordance with the proposed text amendment. The modeling must examine potential impact to surface water, ground water, and irrigation supply.	Nicholas DeFilippo	Open	8
Yes	STRAP No. 09-46-26-00-00001.0540 and 09-46-26-00-00001.00300 were not included in the Synecological Analysts Environmental Assessment but are identified by the applicant as properties that intend to utilize the proposed text amendment.	Nicholas DeFilippo	Open	9
Yes	The FLUCCS map for 14700 Alico Rd prepared by Synecological Analysts calls out Mangrove habitat. Staff suspects this is an error. Please review for accuracy.	Nicholas DeFilippo	Open	10
Yes	Please provide an environmental analysis detailing how the proposed text amendment will both positively and negatively impact the environment. The analysis should address protected species, wildlife habitat, wetlands, and water resources. The analysis must account for all eligible properties developing in accordance with the request.	Nicholas DeFilippo	Open	11
<u>Planning Review</u>				
Yes	The application materials do not include an analysis of the proposed text amendment's impact on Lee Plan Table 1(b). Add this analysis to the Lee Plan Analysis. Contact Rick Burris at rburris@leegov.com for current Table 1(b) allocation allowances.	Katherine Burgess	Open	30

CORRECTIONS NEEDED:

Items marked Yes must be resolved before the plan review can be approved. Items marks "No" may be deferred to subsequent submittals and are not required to be addressed prior to approval of plans and documents.

Document: Exhibit T3 - Community Meeting.pdf

<u>Corrections</u>	<u>Page Ref</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
<u>Planning Review</u>					
Yes	1	Lee Plan Objective 17.3 requires a public input meeting for privately initiated text amendment applications within a Community Plan Area. Provide the information required per Policy 17.3.4 for a public input meeting within the boundaries of Southeast Lee Community Plan Area and consistent with the other requirements of this objective.	Katherine Burgess	Open	12

Document: Exhibit T4 - Proposed Text Changes.pdf

<u>Corrections</u>	<u>Page Ref</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
<u>Planning Review</u>					
Yes	1	The Tradeport FLUC allows for non-industrial uses. Clarify whether Tradeport within SE Lee would be limited to industrial uses. If non-industrial uses are intended as well, clarify how those uses would work with Policy 33.2.5, which has already been exceeded.	Katherine Burgess	Open	13
Yes	1	Provide information on the basis of how 1.0 FAR was determined as the appropriate intensity for this area.	Katherine Burgess	Open	14

<u>Corrections</u>	<u>Page Ref</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
Yes	1	#1 and #2 appear to conflict with each other. Provide some analysis or justification regarding these geographic limitations.	Katherine Burgess	Open	15
Yes	1	There are a lot of properties that would meet the 4-acre requirement. Provide some justification on how this number was determined.	Katherine Burgess	Open	16
Yes	1	Provide an analysis, including a map, of the potential impact this acreage threshold may have on SE Lee.	Katherine Burgess	Open	17
Yes	1	SE Lee requires many of these as the general requirements of the Community Plan Area. Remove the requirements that are already included in Objective 33.1.	Katherine Burgess	Open	18
Yes	1	The wording appears to suggest that mining would be considered an industrial development. Clarify the intent of this statement.	Katherine Burgess	Open	19
Yes	2	This policy appears to conflict with other Lee Plan policies regarding MUDs on non-residential properties. Provide information on the reasoning of why this was included.	Katherine Burgess	Open	20

Document: Exhibit T5 - Impact Analysis.pdf

<u>Corrections</u>	<u>Page Ref</u>	<u>Review Comments</u>	<u>Reviewer</u>	<u>Status</u>	<u>Comment ID</u>
<u>Planning Review</u>					
Yes	1	The subject petition is a text amendment only. If the intent is to apply for a concurrent FLUM amendment, this map may be appropriate as part of this application as well. If the intent is to only move the text amendment forward, consider the potential benefits of including this map, as it does not depict the only places the proposed amendments may impact.	Katherine Burgess	Open	21
Yes	2	The County has not received a companion map amendment as of the first review of this application.	Katherine Burgess	Open	22
Yes	2	The locational standards in the proposed text amendment appears to include areas between the existing Alico Rd and SR 82 that could be considered "South of the Alico Road extension" that are not included in the Private Rec Facilities Overlay. Additionally, Private Rec Facilities would be significantly less intense than industrial uses. Consider revising this section, as it does not appear to directly support the requested amendments.	Katherine Burgess	Open	26
Yes	3	The proposed amendment's locational standards would apply to numerous properties in SE Lee. Provide an analysis of all properties that could become eligible for Tradeport with the proposed amendment.	Katherine Burgess	Open	27
Yes	3	This map is not the only map/area of SE Lee that may be impacted by the proposed text amendments. Maps 1-D and 2-D may also be impacted. Verify and provide explanation on the impact of the proposed text amendments on the other SE Lee Maps.	Katherine Burgess	Open	29
Yes	4	Provide information on the impact the text amendment could have on utilities and services, including the number of properties which could qualify for Tradeport based on the locational standards and the required infrastructure based on the proposed FAR, consistent with Objective 4.1.	Katherine Burgess	Open	28
Yes	5	Add a statement regarding the justification of the requested text amendment. Include data and analysis where necessary to support the request.	Katherine Burgess	Open	25

Document: Exhibit T6 - Lee Plan Analysis.pdf

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<u>Planning Review</u>					
Yes	5	Provide an analysis on the potential impacts to the other special treatment areas in SE Lee such as the the existing acreage subdivisions, mixed-use communities, and EEPCO.	Katherine Burgess	Open	23
Yes	5	Consider whether there are any policies in the other elements of the Lee Plan, such as the Economic Development Element, that could support the text amendment request. Add those policies to the Lee Plan analysis.	Katherine Burgess	Open	24

REVIEWER CONTACT INFORMATION:

<u>Reviewer Name</u>	<u>Reviewer Email</u>	<u>Reviewer Phone</u>
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Katherine Burgess	kburgess@leegov.com	239-533-8362