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DEC 16 2025

Lee County
Dept. of Community Development
Planning Section c/o Kate Burgess, AICP
1500 Monroe Street
Fort Myers, FL 33901

COMMUNITY DEVELOPMENT



ALICO TRADEPORT
Comprehensive Plan Text Amendment
RESPONSE LETTER

Please accept the responses below to your letter dated November 20, 2025 regarding the comments for Alico Tradeport (CPA2025-00006).

Environmental Sciences

1. 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.

RESPONSE: Please see the attached Environmental Plan Consistency Report.

2. The FLUCCS map for 14700 Alico Road prepared by Synecological Analysts calls out Mangrove habitats. Staff suspects this is an error. Please review for accuracy.

RESPONSE: This FLUCCS exhibit has been updated.

3. 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.

RESPONSE: Please see the attached Environmental Plan Consistency Report.

Planning

1. UPDATED -- 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. The application materials, specifically Exhibit T11, state that Table 1(b) needs to be updated. Provide a strikethrough and underline version of the updated table with the text amendment.

RESPONSE: An analysis of Lee Plan Table 1(b) has been provided in Exhibit T6.

2. Provide a revised Lee Plan analysis per the comments provided in the first round of review.

Comments will remain open until addresses in the application package.

RESPONSE: Please see revised Exhibit T6.

3. Schedule a meeting with staff to discuss the review comments.

RESPONSE: Noted, a meeting has been held.

Exhibit T3 - Community Meeting

4. 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 for a public input meeting within the boundaries of Southeast Lee Community Plan Area and consistent with the other requirements of this objective.

RESPONSE: Noted, a community meeting is forthcoming.

Exhibit T4 - Proposed Text Changes

5. 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.

RESPONSE: No alterations to commercial limitations in SE Lee County are proposed.

6. Provide information on the basis of how 1.0 FAR was determined as the appropriate intensity for this area.

RESPONSE: Lee County generally does not limit industrial development based on floor area ratio, therefore, the standard FAR of 1.0 which is used for the Industrial FLU within the City of Fort Myers was incorporated to the text amendment. This is geographically the closest and most similar land use with a FAR limitation.

7. #1 and #2 appear to conflict with each other. Provide some analysis or justification regarding these geographic limitations.

RESPONSE: Please see provided Alico Road Extension - Controlled Access Map and Alico Roadway Exhibit.

8. There are a lot of properties that would meet the 4-acre requirement. Provide some justification on

how this number was determined.

RESPONSE: This minimum acreage is the smallest lot size amongst the current properties which are eligible for the map amendment, as outlined in the proposed text amendment. The reason for including this minimum acreage is to prevent lots from splitting into smaller industrial sites in the future, which could generate small-scale/strip industrial along the corridor.

9. Provide an analysis, including a map, of the potential impact this acreage threshold may have on SE Lee.

RESPONSE: The companion Map Amendment was submitted October 24, 2025.

10. 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.

RESPONSE: The text amendment language has been updated to remove duplicative language.

11. The wording appears to suggest that mining would be considered an industrial development. Clarify the intent of this statement.

RESPONSE: Mining/resource extraction is not contemplated through this text amendment. The mining use is already a permitted use in SE Lee County and is further governed by Lee Plan Goal 10 and is implemented through the LDC's Chapter 12.

12. 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.

RESPONSE: Single family estates are located in the geographic corridor in which the map amendment's subject properties are located. The policy language was included to protect these residences from potentially being limited to industrial development if brought into the Tradeport FLU at any point in time. However, the language has been removed to avoid confusion with LDC Sec. 34-3242, which pertains to nonconformities.

Exhibit T5 - Impact Analysis

13. 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.

RESPONSE: Please see revised Exhibit T6. The range of uses permitted in Private Rec Facilities per Policy 13.3.9 and the calculations contributing to the open space of Private Rec Facilities per Policy 13.3.8(4) imply that this overlay can pose significant impacts to trip generation and water usage in this community.

14. 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.

RESPONSE: Please see provided Alico Road Extension - Controlled Access Map and Alico Roadway Exhibit. Analysis has been updated to reflect potential map amendment sites and a map of eligible properties has been prepared; please see Eligible Properties Exhibit.

15. 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.

RESPONSE: Map 1-D is the "Urban Reserve, Privately Funded Infrastructure, Public Acquisition, Airport Mitigation Lands, & Priority Restoration Strategy Overlays" - these map layers do not feature development criteria which would impact the proposed text amendment or vice versa. Map 2-D is specific to residential development which is not proposed via this request, nor are changes to the map being proposed via this request.

16. 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.

RESPONSE: Please see revised Lee Plan Analysis, updated LOA, and Eligible Parcels Exhibit.

17. Add a statement regarding the justification of the requested text amendment. Include data and analysis where necessary to support the request.

RESPONSE: Please see Text Amendment justification (Exhibit - T11)

Exhibit T6 - Lee Plan Analysis

18. Provide an analysis on the potential impacts to the other special treatment areas in SE Lee such as the existing acreage subdivisions, mixed-use communities, and EEPCO.

RESPONSE: The proposed request would help support existing and planned residential development throughout the SE Lee County Planning Community by having proximate industrial development, which also fosters economic growth, sustainability, and diversity within the community. This use promotes travel along an impacted corridor which is expected to further support traveling public due to the Alico Road Extension which relieves traffic in/out of the adjacent Lehigh Acres community. Additional analysis is included in the Lee Plan Analysis.

19. 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.

RESPONSE: Please see revised Exhibit T6.

Please contact me directly at (239) 226-0024 or if you should have any questions or require additional information.

Sincerely,
EnSite, Inc.



Cindy C. Leal Brizuela, AICP, MURP
Principal Planner

cc: Terry B. Cramer III Esq., Wilbur Smith

Enclosures:

1. Updated T4 -- Proposed Text Changes
2. Updated T5 – Impact Analysis
3. Updated T6 – Lee Plan Analysis
4. Updated T7 - Environmental Plan Consistency Report
5. Exhibit T11 – Justification
6. LCU LOA
7. Eligible Parcels Exhibit
8. Controlled Access Map for Alico Extension
9. 14700 FLUCCS -- Corrected

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, industrial, and private recreation facilities; allowable land uses must be compatible with protecting Southeast Lee County's environment.

POLICY 33.2.6: Industrial uses may only be permitted if incorporated into a Planned Development and located within the Tradeport future land use designation, this does not alter the commercial or resource extraction limitations set forth within the planning community. The maximum industrial floor area that may be approved within the Southeast Lee County community plan area may not exceed 1.0 FAR. Industrial development will only be permitted in conjunction with the following requirements which are not applicable to resource extraction operations:

1. The property must have direct access to Alico Road or the Alico Road Extension
2. The property must be south of the Alico Road Connector/Extension and north of Corkscrew Road
3. The property must be a minimum of 4 acres
4. The planned development rezoning will require the following:
 - a. Provide a minimum of 30% open space; and
 - 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. 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

I. INTRODUCTION

The Applicant would like to request a text amendment to the Lee Plan, specifically to Goal 33 pertaining to development along Alico Road in the Southeast Lee County planning community. The request to amend Goal 33, specially to allow for the development of standalone industrial uses along the existing north/south segment of Alico Road, has language 1) protecting wetland areas, 2) requiring the restoration of historic flow-ways, and 3) other elements which enhance the planning community's overall functionality and sustainability.

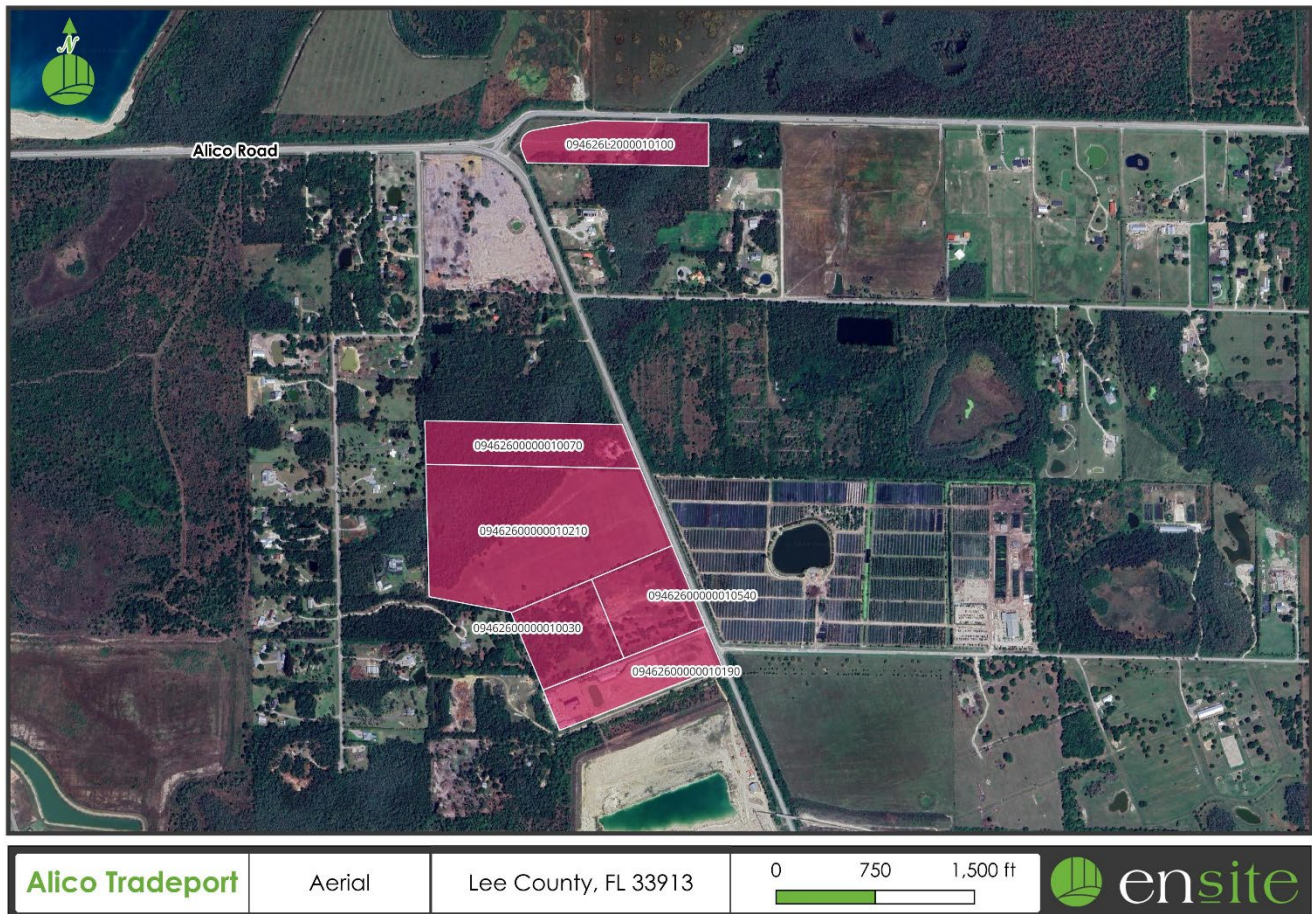


Figure 1. Aerial of Companion Map Amendment Subject Property

II. REQUEST

The draft language for the text amendment has been provided in strike-through underline format as part of this application under Exhibit T4. Much of the proposed language is already found in the Lee Plan specific to the Southeast Lee County planning community. This language can be found in Policy 33.2.4 pertaining to the EEPD Overlay. This request is being sought in conjunction with a large-scale map amendment which consists of six (6) parcels which are further identified as STRAPs; 09-46-26-L2-00001.0100, 09-46-26-00-00001.0070, 09-46-26-00-00001.0210, 09-46-26-00-00001.0540, 09-46-26-00-00001.0190, and 09-46-26-00-00001.0030. These parcels are further identified in Figure 1.

III. AFFECTED AREA ANALYSIS

- **Map 1-F: Private Recreational Facilities Overlay**

Per Lee Plan **Goal 13**, specifically **Policy 13.1.1**, “the Private Recreational Facilities Overlay shows location that are appropriate for the development of Private Recreational Facilities in the DR/GR future land use category.” The entirety of the subject property, and all areas which could potentially be impacted by the text amendment, are located within the Private Recreational Facilities Overlay.

Private Recreation Facilities are defined by the Lee Plan Glossary as follows:

RECREATIONAL FACILITIES:

PRIVATE – Includes nature trails, tent camping areas, boardwalks, play areas (as defined in “Park Planning Guidelines, 3rd Edition”), horse stables and riding areas, service areas, administrative areas, ancillary uses, and golf courses (private or public use). The location of public wellheads and Aquifer Storage and Recovery facilities may be located in Private Recreational Facilities. (Ord. No. 99-16, 10-21)

Further locational requirements set forth by **Policy 13.1.1** are summarized below:

1. Located outside of those areas designated for public acquisition;
2. Located in areas characterized as predominantly impacted with agricultural, mining, or other permitted uses;
3. Located outside of areas depicted as 100 Year Flood Plains;
4. Located to minimize impacts on ecological diversity;
5. Located in areas characterized by large lot single or limited ownership patterns; and
6. Located in areas with direct access to existing roadways.

Given the locational standards required for Public Recreational Facilities, it would extend logic that these locations are different from other areas in the Southeast Lee County Planning Community. The lands, despite being characterized by large lot ownership patterns, are located outside of areas sought for public acquisition and are located outside of the 100 Year

Flood Plains. Furthermore, the above locational standards highlight that these lands have already been impacted with agricultural , mining, or other permitted uses. The entirety of the areas annotated as Private Recreational Facilities per Map 1-F, within the Southeast Lee County planning community, are located along three corridors; SR 82, Corkscrew Road, and Alico Road. Based on Figure 2, there has been ample non-recreational development across the areas annotated in orange which include WildBlue, The Place, and Verdana Village.

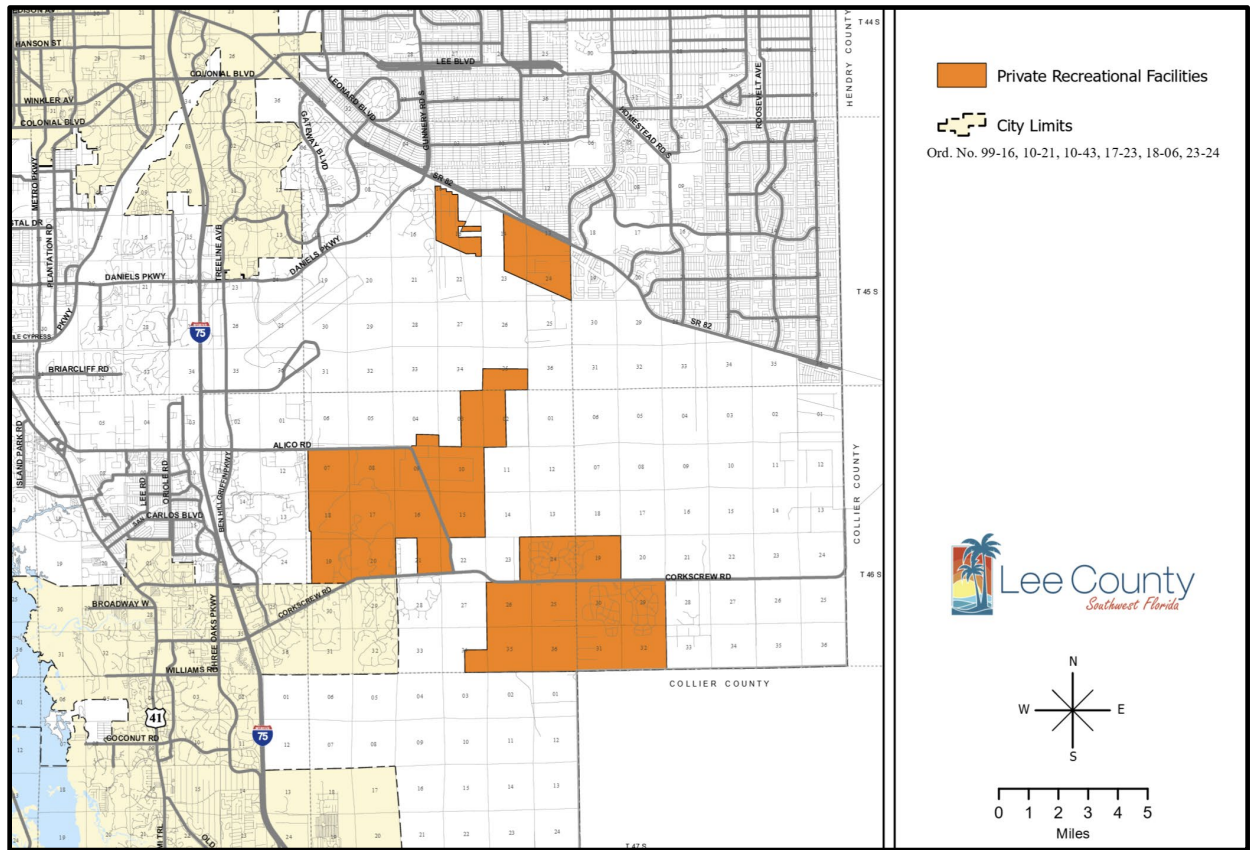


Figure 2. Snapshot of Map 1-F

No changes are proposed to Map 1-F as a result of this application. Should future Applicants choose to pursue private recreational facilities at locations already identified in Map 1-F, then they will need to apply for a planned development rezoning consistent with **Policy 13.2.1** which requires any DR/GR lands seeking this use to go through the PRFPD process.

- **Map 2-A: Community Planning Areas - Southeast Lee County**

The proposed text amendment is specific to the Southeast Lee County community. This area spans over 81,000 acres per Lee Plan Table 1(b) making it the County’s largest planning community in terms of land area. Of these 81,000 acres, the companion map amendment would be applicable across only 88.6 acres generating an impacted area of approximately .001% of the planning community. The language proposed in the text amendment is tailored

to a specific corridor within the planning community, the north/south segment of Alico Road is a heavily impacted area; the roadway features an overhead conveyor to transport mining materials across local mines. As further echoed by the property's location within the Private Recreational Facilities Overlay, these lands are not only impacted but are *not* being sought for conservation purposes despite their ownership patterns. The reason for this can be seen on an aerial of the community - there are resource extraction operations, and ancillary trucking occurring throughout much of this corridor given that this segment of Alico Road bisects the West Lakes Mine.

The language proposed in the text amendment enhances the planning community's economic viability, increases Tradeport lands to support the county's various industries, and protects environmental elements such as wetlands and flow-ways. The request would also compliment the existing surrounding uses, would take into consideration the Alico Road extension being developed north of this corridor, and would promote a cohesive vision for future development in the area; protecting existing residents of the planning community from the encroachment of potentially incompatible residential and commercial uses. Southeast Lee County has several policies which apply to future development in the community, the request supports these policies as outlined in Exhibit T6 - Lee Plan Analysis.

- **Map 1-G: Agricultural Overlay**

Per Lee Plan **Policy 1.6.7**, Map 1-G depicts "existing active and passive agricultural operations in excess of 100 acres located outside of the future urban areas." This policy poses a conflict when paired against Map 1-G, since there is one (1) parcel identified on Map 1-G which is also subject to the companion map amendment request. This parcel, STRAP No.: 09-46-26-00-00001.0210, is less than 40 acres therefore it should not have been placed within the Agricultural Overlay. Given the conflicting language between the map's highlighted areas and the policy language, we are requesting that STRAP No.: 09-46-26-00-00001.0210 be removed from Map 1-G and have provided an updated exhibit reflecting as such in the companion map amendment application.

Furthermore, Map 1-G, last generated/published in 2021, has had limited updates since it was established in 1994. In fact, it lists only Ordinances 03-04, 10-20, 10-43, and 17-23. Ordinance 03-04 was a result of CPA2001-23 which did evaluate the Agricultural Overlay (f.k.a. Map 20). Subsequent to this analysis, Ordinances 10-20 and 10-43 were adopted which addressed mitigating impacts from limerock mining and deleted a reference to the proposed Alico Road Extension on Map 20, respectively. Ordinance 17-23 adopted the Timber Creek comprehensive plan amendment which removed that property from the Agricultural operations map. It should be noted that the current Map 1-G has not undergone a thorough analysis, particularly pertaining to acreage and ownership, since Ordinance 03-04 was adopted. The map details a number of properties, particularly along the traditional Alico Road

Industrial Corridor, which are 1) not active or passive agricultural operations, 2) are not over 100 acres, and 3) are not under unified ownership/contiguous to properties under unified ownership. The only operations which may potentially be impacted by the proposed text amendment are Sunnygrove and Pottinger’s Nurseries which are both located on the eastern side of the north-south Alico Road segment. The text amendment would allow for these properties to seek a future map amendment to Tradeport and develop industrial uses consistent with a subsequent planned development request. Neither operation is in excess of 100 acres.

- **Map 1-D: Special Treatment Areas Overlay**

Map 1-D in the Lee Plan identifies the Urban Reserve, Privately Funded Infrastructure, Public Acquisition, Airport Mitigation lands, & Priority Restoration Strategy Overlay.

Per Lee Plan **Goal 33**, specifically **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.” The entirety of the subject property, and all areas which could potentially be impacted by the text amendment, are not located within the Special Treatment Areas Overlay and therefore will not be influenced by Map 1-D. There are no changes being proposed to Map 1-D at this time.

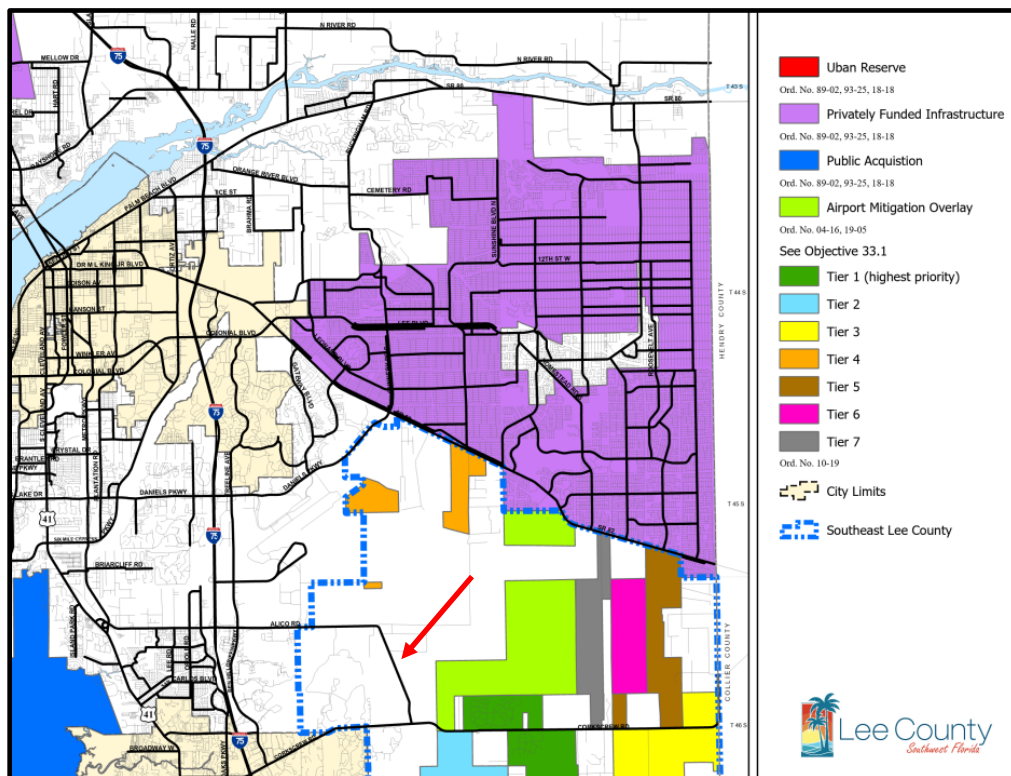


Figure 3. Snapshot of Map 1-D

- **Map 2-D: Southeast DR/GR Residential Overlay**

Per Lee Plan **Goal 33**, specifically **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.” The entirety of the subject property, and all areas which could potentially be impacted by the text amendment, are not located within the Southeast DR/GR Residential Overlay and therefore will not be influenced by Map 2-D. There are no changes being proposed to Map 2-D at this time.

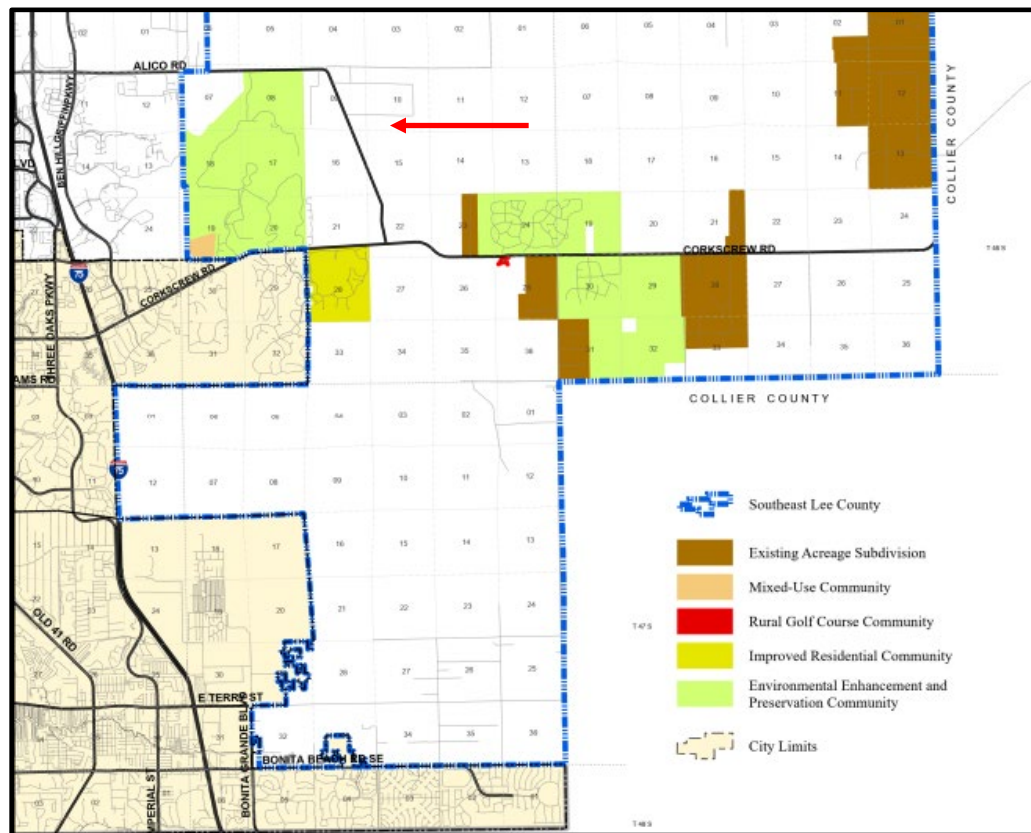


Figure 4. Snapshot of Map 2-D

IV. PUBLIC FACILITIES IMPACTS

1. **Traffic Circulation Analysis** - provided under separate cover
2. **Utilities and Urban Services**
 - a. **Sanitary Sewer**
Please see map amendment calculations.
 - b. **Potable Water**

Please see map amendment calculations.

c. Surface Water/Drainage Basins

The proposed text amendment language would require hydrologic modeling at time of planned development rezoning.

d. Parks, Recreation, and Open Space

N/A regarding Parks & Recreation (No residential units are being generated as part of this request) and 30% open space is being required for industrial developments regardless of size, well in excess of the current open space requirements for industrial projects (10% for small projects and 20% for large projects per LDC 10-415(a)).

e. Public Schools

N/A (No residential units are being generated as part of this request)

V. CONCLUSION

The proposed text amendment would greatly enhance local economic diversity while protecting wetlands and restoring key hydrological functions in the Southeast Lee County community. Please don't hesitate to contact me directly at (239) 226-0024 or CindyL@En-Site.com if you should have any questions or require additional information.

Sincerely,
EnSite, Inc.



Cindy C. Leal Brizuela, AICP, MURP
Principal Planner

cc: Terry B. Cramer III, Esq. - Wilbur Smith

I. INTRODUCTION

The Applicant would like to request a text amendment to the Lee Plan, specifically to Goal 33 pertaining to development along Alico Road in the Southeast Lee County planning community. The request to amend Goal 33, specially to allow for the development of standalone industrial uses along the existing north/south segment of Alico Road, has language 1) protecting wetland areas, 2) requiring the restoration of historic flow-ways, and 3) other elements which enhance the planning community's overall functionality and sustainability.

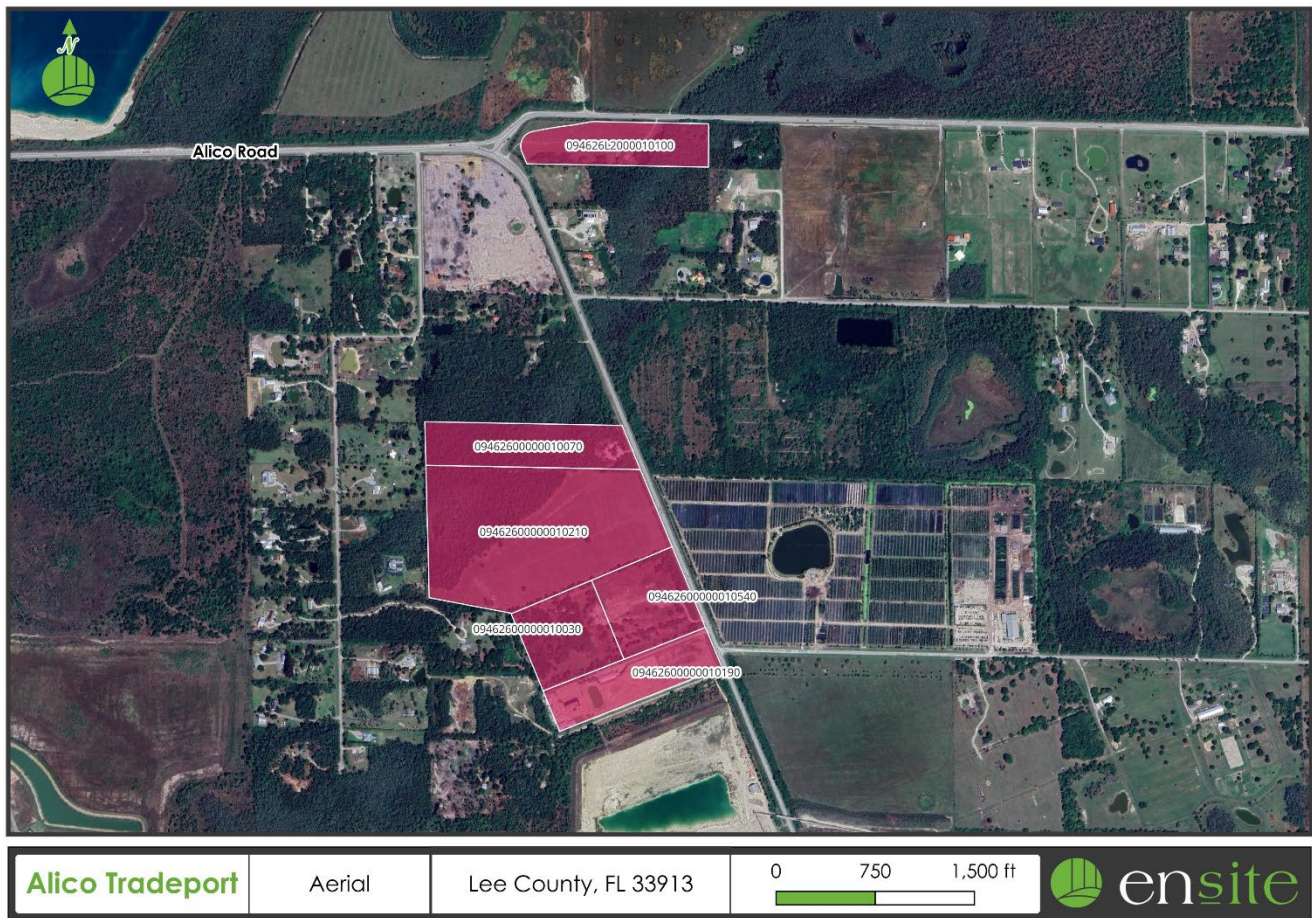


Figure 1. Aerial of Companion Map Amendment Subject Property

II. LEE PLAN ANALYSIS

The following Lee Plan goals, objectives, and policies have been analyzed for consistency with the language of the proposed text amendment.

POLICY 1.1.13: The Tradeport future land use category includes areas of commercial and industrial lands adjacent to the airport. 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 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 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 in Tradeport, are allowed if they are part of a planned development. Residential uses, other than bona fide caretaker's residences, are not permitted in this future land use category.

The proposed text amendment is consistent with Policy 1.1.13, as it pertains to light manufacturing and industrial lands in proximity to the Regional Southwest Airport. The proposed text amendment allows for industrial uses to take place in the Southeast Lee Planning Community, which is adjacent to the Gateway/Airport Planning Community per Lee Plan Map 1-B. Additionally, plans to extend Alico Road through the SE Lee County Planning Community to connect with the Lehigh Acres Planning Community. The Alico Road Connector is identified in Table 3(a) of the Lee Plan (Capital Improvement Program Detail Report). The Alico Road Connector would expand daily commutes to the SE Lee County Planning Community. The proposed text amendment would allow for industrial uses to take place within SE Lee County, which would function as an industrial destination for employees, reducing through traffic/travel and improving economic diversity within the community. No hotels/motels or office uses are proposed, given commercial limitations in the planning community, governed by Goal 33, which are not proposed to be amended. Additionally, the proposed text amendment would allow for the Tradeport FLU to take place within the SE Lee County Community's Alico Road Corridor, which would promote employment opportunities while prohibiting residential uses from taking place within the corridor once a companion map amendment to Tradeport is achieved.

Per Policy 33.2.5, commercial uses may only be incorporated into Mixed-use Communities, Environmental Enhancement and Preservation Communities, or Rural Golf Course Communities, none of which are being proposed as a result of this development. There are no changes proposed to policies referencing commercial uses within Southeast Lee County as a result of the requested text amendment.

POLICY 1.6.7: The Agricultural Overlay (Map 1-G) shows existing active and passive agricultural operations in excess of 100 acres located outside of the future urban areas. Since these areas play a vital role in Lee County's economy, they should be protected from the impacts of new developments, and the County should not attempt to alter or curtail agricultural operations on them merely to satisfy the lifestyle expectations of non-urban residents.

Map 1-G, last generated/published in 2021, has had limited updates since it was established in 1994. In fact, it lists only Ordinances 03-04, 10-20, 10-43, and 17-23. Ordinance 03-04 was a result of CPA2001-23 which did evaluate the Agricultural Overlay (f.k.a. Map 20). Subsequent to this analysis, Ordinances 10-20 and 10-43 were adopted which addressed mitigating impacts from limerock mining and deleted a reference to the proposed Alico Road Extension on Map 20, respectively. Ordinance 17-23 adopted the Timber Creek comprehensive plan amendment which removed that property from the Agricultural operations map. It should be noted that the current Map 1-G has not undergone a thorough analysis, particularly pertaining to acreage and ownership, since Ordinance 03-04 was adopted. The map details a number of properties, particularly along the traditional Alico Road Industrial Corridor, which are 1) not active or passive agricultural operations, 2) are not over 100 acres, and 3) are not under unified ownership/contiguous to properties under unified ownership. The only operations which may potentially be impacted by the proposed text amendment are Sunnygrove and Pottinger's Nurseries which are both located on the eastern side of the north-south Alico Road segment. The text amendment would allow for these properties to seek a future map amendment to Tradeport and develop industrial uses consistent with a subsequent planned development request. Neither operation is in excess of 100 acres.

OBJECTIVE 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, and prevent development patterns where large tracts of land are by-passed in favor of development more distant from services and existing communities.

OBJECTIVE 2.2: DEVELOPMENT TIMING: Direct new growth to those portions of the future urban areas where adequate public facilities exist or are assured and where compact and contiguous development patterns can be created. Development orders and permits (as defined in §163.3164, Fla. Stat.) will be granted only when consistent with the provisions of §163.3202(2)(g) and § 163.3180, Fla.Stat. and the concurrency requirements in the LDC.

The proposed text amendment is consistent with Objectives 2.1 and 2.2, pertaining to the location and timing of incorporating industrial uses into the Alico Road corridor within SE Lee County. The corridor is already impacted in various areas which abut Alico Road, particularly given the existing resource extraction operations (limerock mines) throughout the community and specifically along the Alico Road corridor which features an overhead conveyer system to transport extracted materials. The existing mines have various accessory industrial uses to support mining operations. The proposed text amendment would enhance and expand the industrial opportunities within the corridor to allow for industrial uses (aside from resource extraction) to be a primary use within the corridor. The industrial uses are supported by existing and planned improvements to the corridor.

- **Access; as proposed, the area which may be impacted by the text amendment is bisected by Alico Road, which is classified as a county-maintained major collector with a speed limit of 55 MPH at this location. The north-south segment of Alico Road consists of two lanes and can support industrial levels of traffic as further detailed in the supporting traffic analysis.**
- **Utilities; the north-south segment of Alico Road, as well as much of the western portion of SE Lee County, is located within the Lee County Utilities water service area. The close proximity between the Alico Road corridor and Lee County Utilities**

wastewater service area will require future developments exceeding thresholds set forth by the Standard 4.1.2 of the Lee Plan under Goal 4 to connect to centralized sewer.

- **PD Zoning; Additionally, the proposed text amendment further safeguards the public realm by requiring the planned development process be utilized in conjunction with a map amendment to Tradeport to allow for industrial uses; this affords the community and staff additional opportunities for public input and subsequent conditioning of future projects, should additional safeguards/conditioning be necessary.**

OBJECTIVE 7.1: All development approvals for industrial land uses must be consistent with the following policies, the general standards under Goal 4, and other provisions of this plan.

POLICY 7.1.2: Industrial development is encouraged in the Industrial Development, Tradeport, and Industrial Interchange future land use categories.

The proposed text amendment will support industrial development in the Tradeport future land use category when a map amendment to this FLU category is sought.

POLICY 7.1.3: Industrial land uses must be located in areas appropriate to their special needs and constraints, including, but not limited to, considerations of: topography; choice and flexibility in site selection; access by truck, air, deep water, and rail; commuter access from home-to-work trips; and utilities; greenbelt and other amenities; air and water quality considerations; proximity to supportive and related land uses; and compatibility with neighboring uses. (Ord. No. 93-25, 94-30, 00-22)

POLICY 7.1.4: The timing and location of industrial development will be permitted only with the availability and adequacy of existing or planned services and facilities.

The proposed text amendment would allow for industrial uses to take place within the Tradeport FLU. A subsequent map amendment to the Tradeport FLU would be required, following a planned development rezoning (per proposed text amendment language), and finally a Development Order would be necessary before building permits are issued. Considerations listed in Policy 7.1.3. are outlined as follows;

- **Topography - site grading is determined at time of Development order**
- **Choice & flexibility in site selection - the properties which are eligible for the text amendment have access via Alico Road and are in proximity to the airport and other industrial operations**
- **Access - Alico Road allows for sufficient access to the corridor**
- **Utilities - no changes to Lee Plan's standards pertaining to utility connections are proposed**
- **Greenbelt & Other Amenities - a significant amount of restoration is incorporated into the text amendment language including an increase in open space from the traditionally required 20%**
- **Air Quality - no specific uses are proposed as part of the text amendment, at time of planned Development rezoning, a Schedule of Uses will be required of each property at which time the potential for air quality impacts are analyzed and can be conditioned/mitigated**
- **Water Quality - no specific uses are proposed as part of the text amendment, at time of planned Development rezoning, a Schedule of Uses will be required of each property at**

which time the potential for air quality impacts are analyzed and can be conditioned/mitigated. Additionally, no changes to the wellfield ordinance are proposed.

POLICY 7.1.7: Industrial development will not be permitted if it allows industrial traffic to travel through predominantly residential areas.

The existing north-south segment of Alico Road is not a residential corridor nor does access to it require vehicular traffic to travel through any predominantly residential areas. The area is bisected by Alico Road, which is a county-maintained major collector at this segment. The area is accessible via Alico Road which has an interchange at I-75. Access to the corridor from the south can be sought via Corkscrew Road which also has an interchange at I-75.

POLICY 7.1.8: Lee County will discourage conversion of lands within the Tradeport and Industrial Development future land use categories to other future land use categories to ensure adequate land is available for industrial uses and other employment opportunities.

Tradeport lands are vital to the economic stability of the County as further noted in the aforementioned policy which discourages conversion out of this FLU category to non-industrial FLUs. The proposed text amendment would allow for the inclusion of this FLU category within the SE Lee County Community, further enhancing the region’s economic diversity and stability.

GOAL 13: PRIVATE RECREATIONAL FACILITIES IN THE DR/GR. To ensure that the development of Private Recreational Facilities in the DR/GR is compatible with the intent of this future land use category, including recharge to aquifers, development of future wellfields and the reduction of density.

POLICY 13.2.8: Private Recreational Facilities must have adequate fire protection, transportation facilities, wastewater treatment and water supply, and provided further that they have no adverse effects such as dust, noise, lighting, or odor on surrounding land uses and natural resources.

POLICY 13.3.8 (4): Open Space. A minimum of 85% open space must be provided. However, natural and man-made bodies of water may contribute 100% to achieving the minimum requirements. To the extent possible, pervious paving and parking areas, and buildings elevated above ground level will exceed the 85% open space requirement.

POLICY 13.3.9: DENSITY/INTENSITY LIMITATIONS. Uses in a PRFPD are subject to the following limitations:

<i>Clubhouse/Administrative Area</i>	<i>20,000 SF/18 hole golf course</i>
<i>Golf Course Restrooms</i>	<i>Not to exceed two structures per 18 hole golf course, limited to 150 SF per structure</i>
<i>Maintenance Area</i>	<i>Not to exceed 25,000 SF of enclosed or semi-enclosed building area, on a maximum of 5 acres of land per 18 hole golf course</i>
<i>Fractional Ownership/</i>	<i>• The maximum allowable units will be calculated based on 1 du/10</i>

<i>Time-share Units</i>	<p><i>acres for the entire area of the PRFPD</i></p> <ul style="list-style-type: none"> <i>All timeshare/fractional ownership units must be transferred in accordance with Goal 33</i>
<i>Bed and Breakfast Establishments</i>	<ul style="list-style-type: none"> <i>The maximum number of Bed and Breakfast establishments will be limited to 1 per every 18 holes of golf</i> <i>Bedrooms within a Bed and Breakfast establishment will be limited to a maximum of 7 per unit, with a maximum of two adult occupants per bedroom</i>
<i>Horse Stable</i>	<i>40,000 SF of stable building/10 acres</i>
<i>Camping Restrooms</i>	<ul style="list-style-type: none"> <i>1 toilet per four camp units. Clustered in structure not to exceed 500 SF per structure</i> <i>1 shower per 4 toilets</i>
<i>Camping Area Office</i>	<i>1,000 SF per campground</i>
<i>Commercial Uses</i>	<ul style="list-style-type: none"> <i>Limited to neighborhood commercial development with uses that are in compliance with the Wellfield Protection Ordinance without any exemptions</i> <i>Total commercial gross floor area for the entire area of the PRFPD may not exceed 100,000 SF, not including clubhouse square footage</i>

The Comprehensive Plan Text Amendment does not propose private recreation facilities or commercial uses, and this kind of development cannot be achieved with the requested text amendment. Many of the above facilities have significant impacts that are more severe than the proposed industrial development, including both environmental and traffic impacts. For instance, golf course development would be more intensive on water usage, including for irrigation and for golf course clubhouses, restrooms, and maintenance areas. Vehicular trips may also be more intense as recreational trip generation would increase as well as employee trip generation. No changes are proposed to Goal 13, as such, policies 13.4, 13.5, 13.6, 13.7, and 13.8 do not apply to the Comprehensive Plan Text Amendment being requested.

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.

The proposed text amendment requires a minimum of 30% open space (per proposed Policy 33.2.6 4.a.) which allows for larger water storage and planting areas. Additionally, per the

proposed text amendment's Policy 33.2.6 4.b, historic regional flow-ways must be restored or accommodated, per this same policy's section 4.c historic groundwater levels must also be restored and accommodated. Per 4.d and e; wetlands and indigenous upland habitats must also be restored and preserved, respectively. Furthermore, per 4.f, critical wildlife connections to adjacent conservation areas must be provided where applicable. The draft text amendment provides ample environmental considerations to further safeguard the public from any potential impacts from future map amendment to the Tradeport FLU category.

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 text amendment supports (1) above by requiring the restoration of historic ground water levels (4.c). Furthermore, proposed text amendment features conditions h-j which support above (2) by requiring a site specific ecological and hydrological restoration plan; native landscaping, and the removal of irrigation/fertilizers for agricultural purposes within a limited timeframe.

POLICY 33.2.1: Existing acreage subdivisions are shown on Map 2-D. These subdivisions should be protected from adverse external impacts.

The text amendment is specific to the traditional Alico Road Industrial Corridor which is the north-south segment of Alico Road. There are no existing acreage subdivisions abutting this corridor, likely due to the existing limerock mining operations. The closest subdivisions are WildBlue (EEPCO) and Corkscrew Shores (Improved Residential) per Map 2-D. Both of these subdivisions feature entrances to the west of the subject corridor and are not anticipated to be adversely impacted by the text amendment. Alternatively, the text amendment would allow for employment opportunities which would capture some of the traffic heading further west as a result of the Alico Road extension which relieves the Daniels corridor.

GOAL 158: Achieve and maintain a diversified and stable economy by providing a positive business climate that assures maximum employments.

OBJECTIVE 158.2: Ensure maximum employment opportunities throughout the County.

POLICY 158.2.1: Allocate adequate land on the Future Land Use Map and in Table 1(b) to meet the future commercial, industrial, agricultural, residential, and recreational needs of residents and visitors to the County.

POLICY 158.2.2: Encourage efficient use of industrial areas by:

- *Prohibiting residential development in the Tradeport and Industrial Development future land use categories;*
- *Promoting development of industrial uses with high employment density; and,*
- *Allowing for redevelopment to accommodate business growth.*

GOAL 159: Support the retention and expansion of existing businesses, and the attraction of new domestic and foreign businesses.

GOAL 160: Attract, develop, and retain a 21st-century workforce to support Targeted Industry employment needs.

POLICY 160.1.2: Provide the services needed to maintain the County's position as an attractive and viable location for a diversified workforce.

OBJECTIVE 160.2: Workforce Retention. Promote the continued growth of the workforce.

POLICY 160.2.1: Maintain a workforce with up-to-date skill sets by supporting collaboration and coordination between the County's various educational institutions and employers in Lee County to provide relevant and continuous job training.

OBJECTIVE 160.3: Workforce Education and Training. Collaborate with the County's educational institutions to support the continuing educational needs of current and future populations.

POLICY 160.3.1: Encourage the clustering or co-locating of vocational schools and colleges or universities near employment centers to better connect students to potential employment opportunities

The proposed Comprehensive Plan Text Amendment increases employment opportunities in the county through the expansion of industrial development. This development therefore promotes worker training and high-paying jobs through these industrial uses.

The subject property is also located in close proximity to the Regional Southwest Airport and similar industrial developments, making it consistent with the surrounding region. In combination with the Alico Road Expansion project, traffic will be alleviated in the area because of its easy access.

Additionally, regarding Table 1(b) of the Lee Plan for Planning District 18 (SE Lee County):

Planning District 18 has an industrial allocation of 215 acres which is primarily to support the mining operations and possibly some agricultural processing operations that are considered industrial but are needed to support the agricultural operations.

The County has an inventory of 174 acres of industrial uses in Planning District 18. Of that only 31 acres are not related to mining operations.

The total industrial building area in Planning District 18 is 205,000 SF.

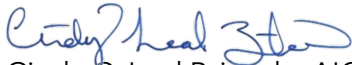
[The above is an excerpt from an e-mail provided by Rick Burris on 09/11/2025]

Given the above information, the companion map amendment would propose approximately 58 acres of Tradeport within Planning District 18, resulting in **273 acres** of industrial land uses allocated in the Southeast Lee County Planning District.

III. CONCLUSION

The proposed text amendment is consistent with several policies set forth by the Lee Plan. The text amendment would greatly enhance local economic diversity while protecting wetlands and restoring key hydrological functions in the Southeast Lee County community. Please contact me directly at (239) 226-0024 or CindyL@En-Site.com if you should have any questions or require additional information.

Sincerely,
EnSite, Inc.



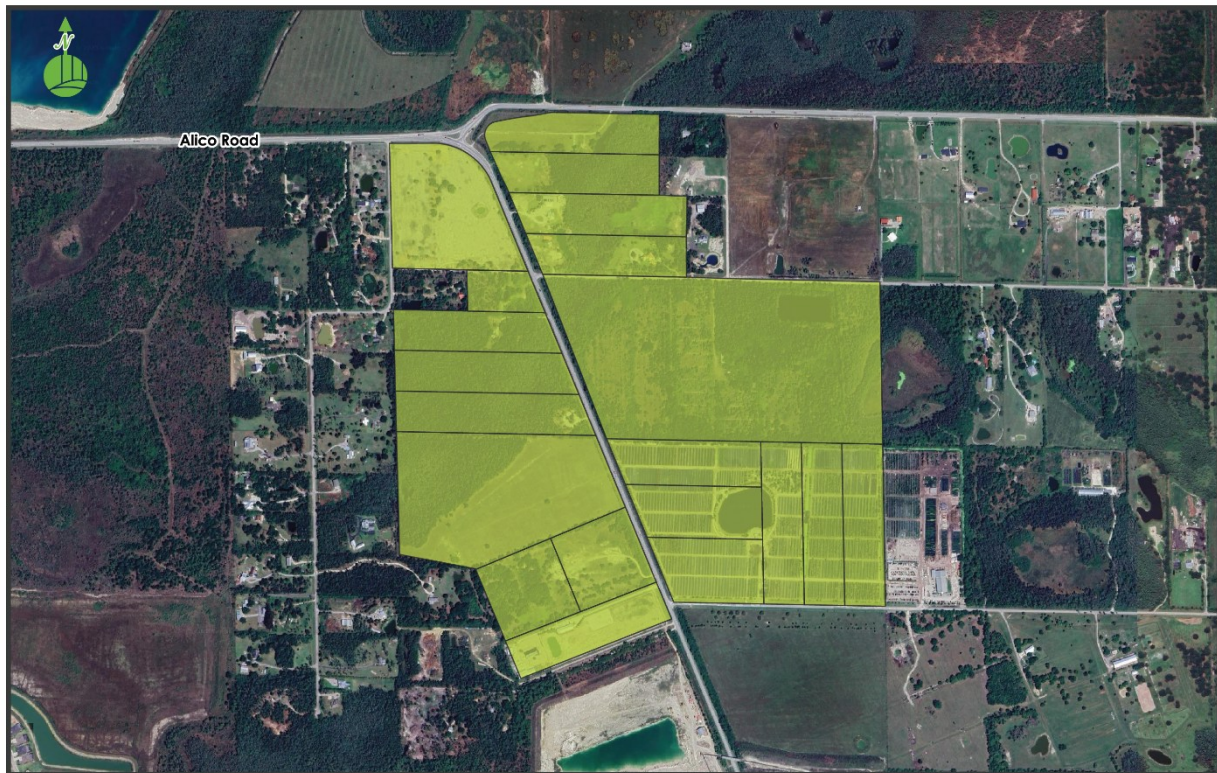
Cindy C. Leal Brizuela, AICP, MURP
Principal Planner

cc: Terry B. Cramer III, Esq. - Wilbur Smith

ENVIRONMENTAL LEE PLAN CONSISTENCY

TEXT AMENDMENT CPA2025-00006

ALICO TRADEPORT



NOVEMBER 2025

Prepared For:



Prepared By:



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EXECUTIVE SUMMARY

Goal 33 Text Amendment

The proposed text amendment would allow for the development of industrial land uses on either side of Alico Road's north-south segment which features access to Alico Rd's interchange at I-75 as well as Corkscrew Road's interchange at I-75. This amendment addresses the lack of employment centers throughout the community while promoting appropriate and complimentary industrial land uses in proximity to resource extraction operations which have heavy impacts to land and surrounding lands.

Implementation of Findings

The text amendment's role in improving the ecological quality of the Southeast Lee County Planning Community is summarized in the finding that through environmental assessment, the proposed text amendment is consistent with environmental policies under Goals 33, 60, 123, 125, 126, and 127 in the Lee Plan. The proposed language of the text amendment allows for ample ecological enhancements through the incorporation of wetland, open space, and groundwater protection measures in the requested text language.



INTRODUCTION

The Southeast Lee County Planning Community is made up of uplands and wetlands, the uplands are generally categorized in the DR/GR future land use designation and are considered ecologically sensitive in nature through their lack of human disturbance, however, the lands bisected by Alico Road South pose a challenge to this designation as many of these lands have been degraded through agricultural operations and/or are proximate to existing resource extraction operations.



FIGURE 1. Aerial of Alico Road

CORRIDOR HISTORY

By 1990, growth in Lee County had increased significantly with little to no signs of slowing. As a result of subsequent litigation with the Florida Department of Community Affairs over the residential capacity of the county, Lee County had to designate over 82,000 acres as Density Reduction/ Groundwater Resource (DR/GR). The lands characterized as DR/GR had the greatest potential for protection of; 1) large tracts of conservation lands, and 2) shallow aquifers. This classification came with a density limitation - one (1) dwelling unit per every ten (10) acres would be the standard density range of the community. It is important to mention that the other Future Land Use designation which occurs throughout the planning community is Wetlands, which may develop residences at a den-

sity of one (1) dwelling unit per every 20 acres.

At the time of the designation in 1990, Lee County already had a number of limerock mines in this planning community, and by 2016, the County was the regional limerock supplier for a seven (7) county area. Several limerock mines are located along the traditional Alico Road Industrial Corridor; notably, University and West Lakes Mines, which are bisected by Alico Road's north/south segment and feature an overhead conveyance belt to transfer materials between the mines.

The mines located throughout the corridor pose a stark contrast to the low density residences found in Southeast Lee County. Lee Plan Policy 33.2.5 is specific to commercial development within the Southeast Lee County Planning Community. The policy highlights

the criteria necessary for commercial development to take place including being part of a minimum of 2,000-acre Mixed-Use Planned Development or a Rural Golf Course Community and being limited to a Neighborhood Commercial scale. The retail component of commercial development is associated with a higher trip generation based on specific uses, consequently posing a challenge in compatibility along the traditional Alico Road Corridor.

ALICO ROAD CONNECTOR

Lee County's Department of Transportation has prioritized Project #209245 which is known as "Alico Road Connector" and locally as the Alico Road/SR 82 extension. This project connects Alico Road to SR82 through Green Meadow Road which turns due north just east of Alico Road's only existing north-south segment. This segment of the roadway, which abuts the eligible properties, is referenced as Alico Road South throughout plans and documents for the construction of the Alico Road Connector.

The timing for the Alico Road Connector is crucial to the text amendment request. This connector is listed as having two major benefits/drivers including linking people to employment and alleviating the congestion along Daniels Parkway. The project has a budgeted amount of \$10,759,314 for the 2024 fiscal year and is anticipated to cost \$106,540,155 over the course of the next 6-10 years. The overall cost of the project is \$135,877,242 making it one of the most ambitious roadway projects in the County.

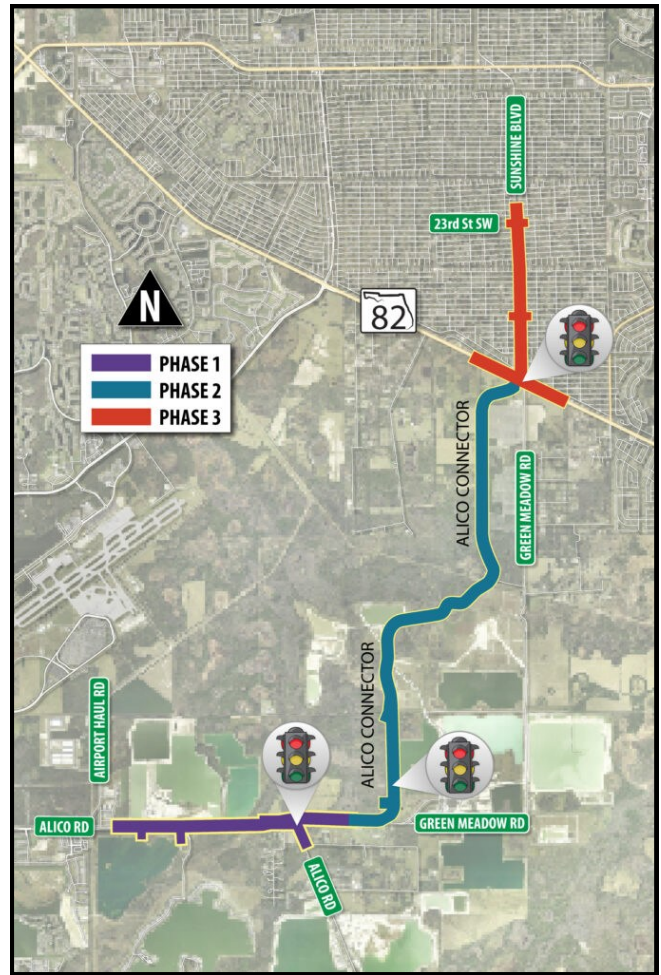


FIGURE 2. Alico Connector – Project Phasing



FIGURE 3. Aerial of SE Lee County & Surrounding Areas

TEXT AMENDMENT REQUEST

The Text Amendment follows Lee Plan Goal 33, which provides provisions for the Southeast Lee County Planning Community. The additional language is as follows:

POLICY 33.2.6: Industrial uses may only be permitted if incorporated into a Planned Development and located within the Tradeport future land use designation. The maximum industrial floor area that may be approved within the Southeast Lee County community plan area may not exceed 1.0 FAR. Industrial development will only be permitted in conjunction with the following requirements which are not applicable to resource extraction operations;

- 1. The property must have direct access to Alico Road or the Alico Road Extension*
- 2. The property must be south of the Alico Road Connector/Extension and north of Corkscrew Road*
- 3. The property must be a minimum of 4 acres*
- 4. The planned development rezoning will require the following:*
 - a. Provide a minimum of 30% open space;*
 - b. Restore and accommodate existing and historic regional flow-ways where possible;*
 - c. Restore and accommodate existing and historic groundwater levels where possible;*
 - d. Restore and preserve wetlands to the maximum extent possible;*
 - e. Restore and preserve indigenous upland habitats to the maximum extent possible;*
 - f. Provide critical wildlife connections to adjacent conservation areas if available; and*
 - g. 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.*
 - a. 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;*
 - b. Use of Florida Friendly Landscaping with low irrigation requirements;*
 - c. 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*
- 5. Protects public wells through compliance with the requirements of the Well Field Protection Ordinance*

POLICY 33.2.7: Properties which are located in non-residential future land use categories may seek a Minimum Use Determination per the Administrative Code if residential structures were damaged beyond repair.

LEE PLAN ANALYSIS

GOAL 33

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 combination of the 30% open space requirement and exotic control of indigenous preserve areas increase the surface water flow and percolation by reducing the transpiration of exotic vegetation while adding no adverse impacts on this system.



GOAL 60

POLICY 60.1.1: Require design of surface water management systems to protect or enhance the groundwater.

The text amendment requires groundwater modeling at time of PD zoning to ensure consistency with historic groundwater levels.

POLICY 60.1.2: Incorporate, utilize, and where practicable restore natural surface water flow-ways and associated habitats.

The text amendment will require exotic control in indigenous open space areas. These areas are most often a combination of wetlands and/or wetland adjacent areas. Exotic control improves infiltration of surface water and simultaneously improves wildlife habitat and wildlife existing/historic movement connections.

POLICY 60.4.3: The County encourages the preservation of existing natural flow-ways and the restoration of historic natural flow-ways.

The 30% open space requirement combined with the location of many open space areas being wetlands or adjacent to wetlands provides preservation of existing and historic flow ways. Most of these areas are dominated by exotic woody vegetation. The exotic control in the preserved open space areas reduces huge volumes of transpiration of water by these trees and increases the water available for both surface flow and percolation. These outcomes therefore preserve the flow ways.

GOAL 123

POLICY 123.1.5: Encourage private restoration of natural habitats to support connectivity between public and private conservation and preservation efforts.

Many of the areas are likely to be preserved to achieve the 30% open space standard are wooded areas associated with wetlands. These wooded/wetland parcels west of Alico Rd. are in line with an E-W orientation and connect to the west with a large N-S preserve. These are created as part of the Wild Blue development. The parcels to the east of Alico Road connect with other wooded/wetland areas on a N-S axis to connect to the south with both the Lee Airport Preservation Area and the Corkscrew Regional Wetland Mitigation Bank.

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.

Both the 30% open space and exotic control in preserved/open space areas provide wildlife corridors to the areas referenced in this policy to both protect and enhance the wildlife and recreation areas. The increased flow/percolation resulting from exotic vegetation control actually enhances the downflow aquatic areas.

POLICY 123.4.1: Identify, inventory, and protect flora and fauna indicated as endangered, threatened, or species of special concern in the "Official Lists of Endangered and Potentially Endangered Fauna and Flora of Florida," Florida Fish and Wildlife Conservation Commission (FWC), as periodically updated.

The Environmental Assessment documents provided for each parcel of this application provide in depth discussion of endangered and listed species as referenced above. None were observed as resident of any of these parcels. The combination of preserving and enhancing existing/historic wildlife corridors along with exotic control to improve habitat quality satisfy this policy.

POLICY 123.11.4: Protect and expand upon the Corkscrew Regional Ecosystem Watershed Greenway, a regionally significant greenway with priority panther habitat, through continued participation in public land acquisition and restoration programs, and incentive programs to preserve and restore habitats.

The combination of 30% open space and exotic control enhancement are positive contributions to greenway, panther habitat, and other acquisition + recreation + incentive programs. The preserved and enhanced open space areas on the parcels proposed provide a template for subsequent habitat preservation and restoration efforts.

POLICY 123.12.1: Promote connectivity within and among Florida black bear sub-populations by maintaining, improving, or creating landscape connectivity as identified within the FWC Florida Black Bear Management Plan.

Many of the areas are likely to be preserved to achieve the 30% open space standard are wooded areas associated with wetlands. These wooded/wetland parcels west of Alico Rd. are in line with an E-W orientation and connect to the west with a large N-S preserve. These are created as part of the Wild Blue development. The parcels to the east of Alico Road connect with other wooded/wetland areas on a N-S axis to connect to the south with both the Lee Airport Preservation Area and the Corkscrew Regional Wetland Mitigation Bank. Combined, this provides improved Black Bear landscape connectivity.



GOAL 125

POLICY 125.1.2: New development and additions to existing development must not degrade surface and ground water quality.

The 30% open space requirement along with the exotic control of indigenous preserved areas protect and enhance surface and ground water quality by allowing historic overland flow and transpiration through and from these areas.

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.

If/when such developments are encountered, appropriate monitoring data collection and evaluation will be proposed, likely during time of PD zoning when specific uses are requested. Moreover, developments will be required to obtain SFWMD ERP and USEPA NPDES permits, which require water quality standards be met prior to issuance.

GOAL 126

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.

The combination of the 30% open space along with exotic control of preserved indigenous areas provide enhanced runoff, recharge, and maintenance of both stream flow and ground water levels. Recent SFWMD surface water design standards also enhance both the protection and management of stream and ground water.

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 proposed text requires a PD rezone as well as consistency with localized historic groundwater levels, creating ecological enhancements inclusive of improving surface water flows, groundwater levels, and lake levels. An ERP will also be sought in conjunction with a development order permit.



GOAL 127

POLICY 127.1.1: Development must prevent significant emissions of air pollution.

Any specified use listed in a subsequent PD rezone will be analyzed to further address this policy, if necessary. No specified uses are listed as part of the text amendment request and the Schedule of Uses in a subsequent PD would be reviewed by staff prior to being heard before the county hearing examiner, and would also be reviewed and have final approval subject to the Board of County Commissioners.

CONCLUSION

As the proposed text amendment modifies the Southeast Lee Community Planning Area, it is important to consider both the Alico Road Corridor history and the environmental conditions of the region. Specifically, the newly proposed Alico Road Connector which would reclassify the subject road segment as Alico Road South and would allow for cut-through traffic from Lehigh Acres southward in the AM and northward in the PM as consistent with the major employment centers to the west of the Lehigh Acres Community. This roadway expansion not only alleviates the number of trips impacting the Daniels Parkway corridor, but redirects trips into the Southeast Lee County Planning Community. The opportunity to enhance the regional economy for this planning community is symbiotic to the expansion of the roadway, which would allow for employment centers and a flourishing job market in support of the nearby airport and adjacent mines.

The proposed text amendment effectively prohibits the development of residential within eligible properties which choose to proceed with a map amendment to the Tradeport FLU. The decrease in density along the corridor along with the language proposed to restore and enhance the ecological functionality of the wetlands, as well as the uplands, promotes a thoughtful and comprehensive approach to development. Additionally, the text amendment is consistent with environmental policies under Goals 33, 60, 123, 125, 126, and 127 in the Lee Plan as further annotated throughout this analysis. The increased open space, as well as regulations pertaining to historic groundwater levels and modeling required as part of a PD rezone, all ensure consistency with the Lee Plan as well as the enhancement of the corridor in a well-planned and eco-centric approach which balances industrial development with ecological improvements.



I. BACKGROUND

The proposed text amendment is specific to the historic Alico Road Industrial Corridor within the Southeast Lee County Planning Community. This community is the largest in Lee County by land size, comprising of over 80,000 acres. Despite this expansive area, totaling approximately 16% of Lee County's total land, the Planning Community features a modest mix of low-density rural estates and other residential uses. The other notable land use found throughout the community is limerock mining.

a. CORRIDOR HISTORY

The subject corridor of the text amendment has a long history of human disturbance. Aerials from 1972 demonstrate the degree to which agricultural activities took place along the corridor.



**Fig. 1 Screenshot from Lee County Historical Aerial Slider
1972**

By 1990 growth in other areas of Lee County had increased significantly with little to no signs of slowing. As a result of subsequent litigation with the Florida Department of Community Affairs over the residential capacity of the county, Lee County had to designate over 82,000 acres as Density Reduction/ Groundwater Resource (DR/GR). The lands characterized as DR/GR had the greatest

potential for protection of; 1) large tracts of conservation lands, and 2) shallow aquifers. This classification came with a density limitation - one (1) dwelling unit per every ten (10) acres would be the standard density range of the community. It is important to mention that the

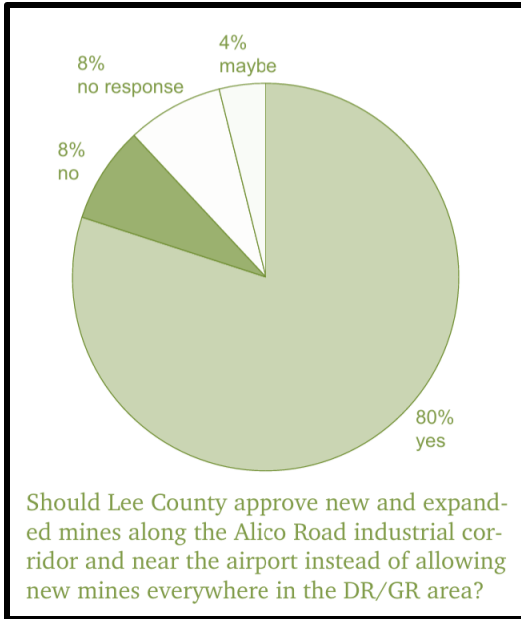


Fig. 2 Excerpt from Dover Kohl Study 2008

publishing of the 2008 Dover Kohl report “Prospects for Southeast Lee County”, a series of community outreach workshops and sessions were held. One (1) of the many questions asked to the community members in attendance noted a high response with 80% of respondents voting favorably towards limitations on new mine siting being constrained along the Alico Road Industrial Corridor/and near the airport, supporting the position that the corridor’s impacts from (Fig. 2) existing mining make it unsuitable for an assortment of uses and poses a challenge in terms of compatibility with residential and commercial development. Other uses, such as less intensive forms of industrial development, were not pitched to the community respondents for additional feedback. This is further noted in Figure 3.

One (1) of the most impactful statements of the study was the principle that *“Limerock mining is a high-disturbance activity whose effects on the surrounding area can never be completely mitigated.” (Pg.3.3)* The traditional Alico Road Industrial Corridor has been disturbed since the 1970s when farming occurred throughout the corridor. Furthermore, the proximity of the text amendment’s eligible properties, noted in Figure 4, to the existing mines means that there are concerns in terms of compatibility for any future development along the corridor. Residential along this corridor would be highly incompatible, even at low densities, due to the larger vehicles,

other Future Land Use designation which occurs throughout the planning community is Wetlands which may develop residences at a density of one (1) dwelling unit per every 20 acres.

At the time of the designation in 1990, Lee County already had a number of limerock mines in this planning community and by 2016 the County was the regional limerock supplier for a seven (7) county area. A number of limerock mines are located along the traditional Alico Road Industrial Corridor; notably, University and West Lakes Mines which are bisected by Alico Road’s north/south segment and feature an overhead conveyance belt to transfer materials between the mines.

The mines located throughout the corridor pose a stark contrast to the low density residences found in Southeast Lee County. Prior to the

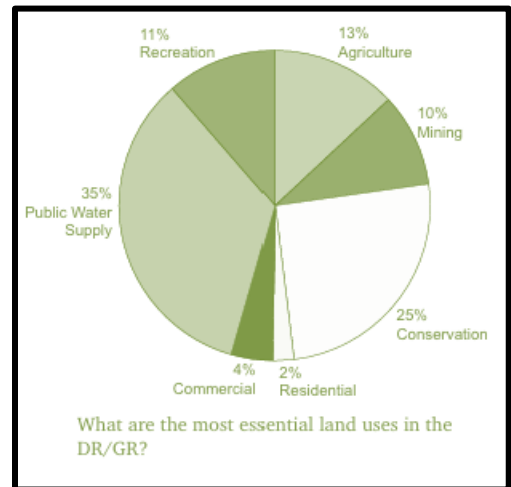


Fig. 3 Excerpt from Dover Kohl Study 2008

equipment, and haul trucks traversing along limited roadways.

Additionally, Lee Plan Policy 33.2.5 is specific to commercial development within the Southeast Lee County Planning Community. The policy highlights the criteria necessary for commercial development to take place including being part of a minimum of 2,000-acre Mixed-Use Planned Development or a Rural Golf Course Community and being limited to a Neighborhood Commercial scale. The retail component of commercial development is associated with a higher trip generation based on specific uses, consequently posing a challenge in compatibility along the traditional Alico Road Corridor.

b. CURRENT & FUTURE CONDITIONS

The historic Alico Road Industrial Corridor currently features two (2) large mining operations on either side of Alico Road, impacting the corridor and creating major compatibility concerns for any future residential or commercial development. Per the DR/GR's descriptor in the Lee Plan, Policy 1.4.5(2), the allowable land uses within this designation consist of "agriculture, natural resource extraction and related facilities, conservation uses, public and private recreation facilities, and residential uses"

The properties to the north of University Lakes and West Lakes mines, are particularly impacted by these operations given the close proximity to the mines, it should be noted that Green Meadows Mine is located to the north of Alico Road. Limerock mines surround the properties in Figure 4. The matter of compatibility with mining operations comes into play when a use, other than mining, takes place in proximity to an active mine. The mines in Lee County have an assortment of sunset dates which can be extended through Emergency Orders (EOs) as well as other regulatory mechanisms to ensure that there is sufficient supply for the demand across a seven (7) county region.

Active mining and ancillary activities (blasting, ready-mix manufacturing, stockpiling, truck hauling, etc.) are more compatible with lower-impact industrial uses than residential or commercial development, both of which are already permitted in the corridor with stringent criteria. The intent to create a compatible, functional, and economically sustainable corridor is being proposed via the text amendment. By allowing industrial to take place when paired with a FLU amendment and subsequent Planned Development (PD) rezoning, the corridor expands its economic potential while promoting the restoration of critical wildlife connections and environmentally sensitive wetlands.

II. REQUEST

The request being made is for a text amendment to the Lee Plan, specifically addressing industrial land uses in the Southeast Lee County Planning Community (Goal 33).

a. TEXT AMENDMENT LANGUAGE

The text amendment's language was crafted by replicating language found throughout the Lee Plan, specifically in addressing the potential for commercial development as noted

in Lee Plan Policy 33.2.4(2) which outlines the planned development criteria for development of “Environmental Enhancement and Preservation Communities” (EPCO). The text amendment draft language is 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, industrial, and private recreation facilities; allowable land uses must be compatible with protecting Southeast Lee County’s environment.

POLICY 33.2.6: Industrial uses may only be permitted if incorporated into a Planned Development and located within the Tradeport future land use designation. The maximum industrial floor area that may be approved within the Southeast Lee County community plan area may not exceed 1.0 FAR. Industrial development will only be permitted in conjunction with the following requirements which are not applicable to resource extraction operations:

1. The property must have direct access to Alico Road or the Alico Road Extension
2. The property must be south of the Alico Road Connector/Extension and north of Corkscrew Road
3. The property must be a minimum of 4 acres
4. The planned development rezoning will require the following:
 - a. Provide a minimum of 30% open space;
 - 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. 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

b. ELIGIBLE PROPERTIES

The properties which are eligible for the text amendment are located along the traditional Alico Road Industrial Corridor and are to the east and west of Alico Road’s north-south segment. These properties are highlighted in Figure 4. These properties abut Alico Road and are north of University Lakes and West Lakes mines. They are located along the north-south segment of Alico Road which is anticipated to see additional trips through the planned Alico Road extension which would connect the roadway to SR-82 (through Green Meadow Road), bordering the Lehigh Acres planning community.

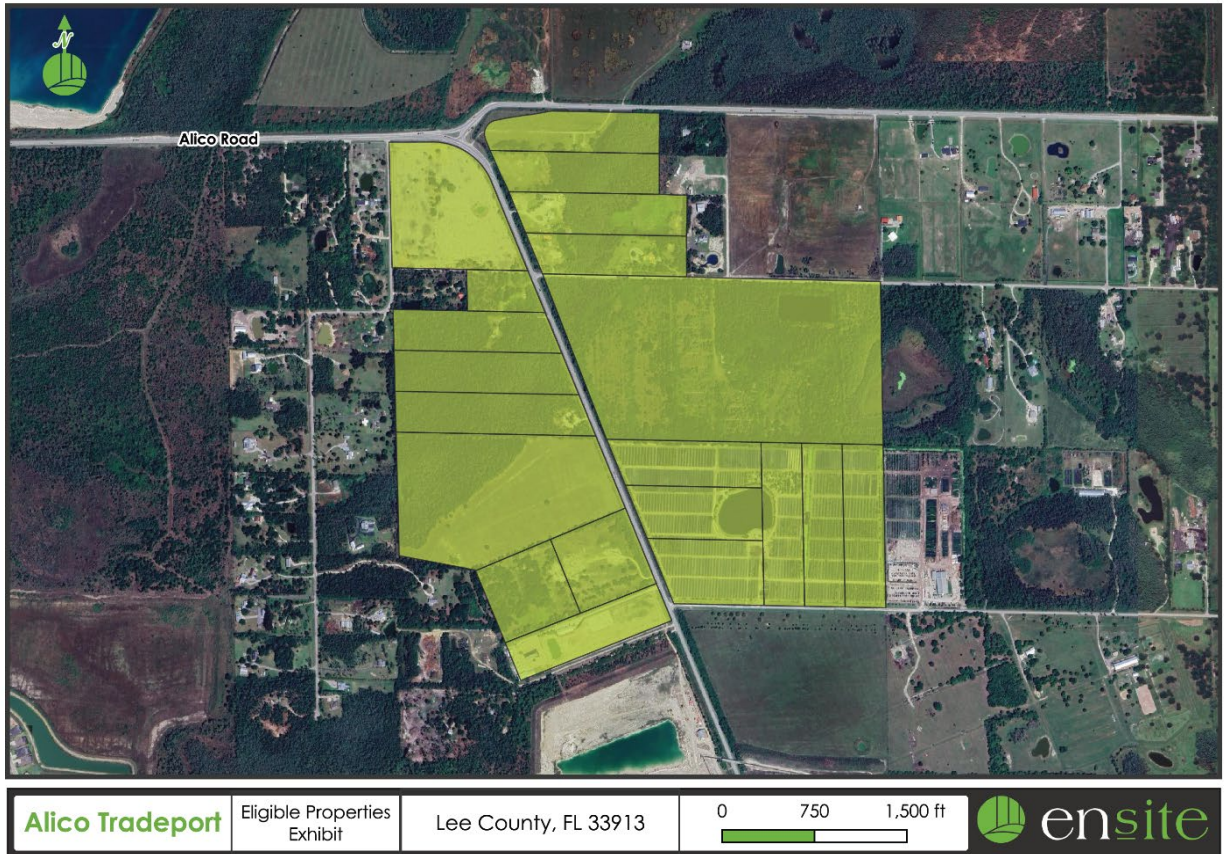


Fig. 4 Eligible Properties
2025

The properties eligible for a text amendment share a geographic corridor which has been traditionally impacted by mining operations and as such, face compatibility issues in terms of residential or commercial development. Furthermore, the properties all abut Alico Road (or are under the same ownership as contiguous properties abutting Alico Road - as is the case with three of the parcels).

III. RATIONALE

There are a number of factors which promote the development of industrial land uses along this corridor. These include development location, development timing, economic

diversity, as well as the incentivizing a compactly configured development pattern with flexibility in terms of design and land uses. The text amendment also features a number of safeguards to encourage the development of industrial uses in a manner that is complimentary to the Southeast Lee County planning community.

a. DEVELOPMENT LOCATION

The matter of compatibility along the corridor paired with other limitations throughout the Lee Plan make residential or commercial development at this location incompatible. The incorporation of the Tradeport FLU along the corridor would allow for complimentary industrial land uses to take place and would promote a healthy mix of uses in an area which will have limerock mining at the forefront of its land uses for the remainder of the Lee Plan’s planning horizon.

b. DEVELOPMENT TIMING

It is important to consider that Lee County’s Department of Transportation has prioritized Project #209245 which is known as “Alico Road Connector” and locally as the Alico Road extension. This project connects Alico Road to SR82 through Green Meadow Road which turns north just past Alico Road’s only existing north-south segment. This portion of the roadway, which abuts the eligible properties, is referenced as Alico Road South throughout plans and documents for the construction of the Alico Road Connector.

The timing for the Alico Road Connector is crucial to the text amendment request. This connector is listed as having two major benefits/drivers including linking people to employment and alleviating the congestion along Daniels Parkway. The project has a budgeted amount of \$10,759,314 for the 2024 fiscal year and is anticipated to cost \$106,540,155 over the course of the next 6-10 years. The overall cost of the project is \$135,877,242 making it one of the most ambitious roadway projects in the County.

c. ECONOMIC DIVERSITY

Given the critical role the Alico Road Connector will play in the reconfiguration of traffic patterns throughout the Southeast Lee County planning community, it is important to understand the intersection of land use and transportation efforts from a holistic perspective. The Alico Road Connector to SR-82 will connect the Lehigh Acres planning community, a community of 127,391 people, to the southern portion of Lee County which include Estero and Bonita Springs, with populations of ±38,000 and ±57,000, respectively. The largely undeveloped areas adjacent to these communities, particularly to the east of I-75, will see an influx of movement promoted by the Alico Road Connector carrying a large population from Lehigh Acres to Alico Road/I-75 interchange as well as the Corkscrew Road/I-75 interchange.

As the population of Lehigh Acres continues to traverse southward for employment in the southern parts of Lee County as well as Collier County, the movement of vehicular

traffic traversing south-bound through county roadways will increase exposure to the Southeast Lee County planning community, particularly along the traditional Alico Road Industrial Corridor which has already been degraded through human activity since the 1970s. By alleviating traffic from Daniels Parkway, to the north of the airport, the Alico Road Connector effectively promotes the use of the Southeast Lee County planning community as a cut-through community. Given the community's limited employment opportunities to-date, options within this planning community are mining-related or agricultural in nature which has been suffering from years of ruinous citrus greening.

By allowing for industrial land uses to take place along the traditional Alico Road Industrial Corridor, the planning community would have additional employment options and opportunities. This is further supported by the lack of industrial uses in Table 1(b) of the Lee Plan for Planning District 18 (SE Lee County):

Planning District 18 has an industrial allocation of 215 acres which is primarily to support the mining operations and possibly some agricultural processing operations that are considered industrial but are needed to support the agricultural operations.

The County has an inventory of 174 acres of industrial uses in Planning District 18. Of that only 31 acres are not related to mining operations.

The total industrial building area in Planning District 18 is 205,000 SF.

[The above is an excerpt from an e-mail provided by Rick Burris on 09/11/2025]

d. SAFEGUARDS

The text amendment features a number of safeguards to protect the corridor's limited capacity as an environmental corridor. The language of the text amendment would require the protection and restoration of a notable flow way which runs across the traditional Alico Road Corridor and would impede industrial development from taking place within wetlands to the greatest extent possible. This flexibility is built in to allow for the South Florida Water Management District to opine on the quality of the wetlands and determination for preservation quantities as well as additional mitigation which may be required.

The text amendment language also requires any industrial land use to undergo the planned development rezoning process which allows for additional review from stakeholders and staff to ensure consistency and compliance with the Lee Plan and Land Development Code. The PD rezoning process ensures that the final approval of any industrial development along this corridor is determined by the Lee County Board of County Commissioners.



BOARD OF COUNTY COMMISSIONERS

Kevin Ruane
District One

October 10, 2025

Via E-Mail

Cecil L Pendergrass
District Two

Brian Smith

David Mulicka
District Three

Ensite, Inc.
2401 First Street, Suite 201
Fort Myers, FL 33901

Brian Hamman
District Four

Mike Greenwell
District Five

RE: **Potable Water and Wastewater Availability**
Alico Road – 14800 Alico Road, Fort Myers, FL 33913
STRAP # 09-46-26-00-00001.0070, 09-46-26-00-00001.0210,
09-46-26-00-00001.0030, 09-46-26-00-00001.0540 & 09-46-26-00-00001.0190

Dave Harner, II
County Manager

Richard Wm. Wesch
County Attorney

Donna Marie Collins
County Hearing
Examiner

To whom this may concern:

The subject property is located within Lee County Utilities Water Future Service Area as depicted on Maps 4A of the Lee County Comprehensive Land Use Plan but is not located within Lee County Utilities Sewer Future Service Area as depicted on Map 4B. Potable water lines are in operation adjacent to the property mentioned above. However, to provide sewer service to the subject parcels, developer funded system enhancements such as line extensions may be required.

Your firm has indicated that this project will consist of 2,530,834 SF industrial units with an estimated flow demand of approximately 104,825 gallons per day. Lee County Utilities presently has sufficient capacity to provide potable water and sanitary sewer service as estimated above.

Availability of potable water and sanitary sewer service is contingent upon final acceptance of the infrastructure to be constructed by the developer. Upon completion and final acceptance of this project, potable water service will be provided through our Corkscrew Water Treatment Plant.

Sanitary sewer service will be provided by our Three Oaks Water Reclamation Facility. The Lee County Utilities' Design Manual requires the project engineer to perform hydraulic computations to determine what impact this project will have on our existing system.

Prior to beginning design work on this project, please meet with LCU Staff to determine the best point of connection and discuss requirements for construction. This letter should not be construed as a commitment to serve, but only as to the availability of service. Lee County Utilities will commit to serve only upon receipt of all appropriate connection fees, a signed request for service and/or an executed service agreement, and the approval of all State and local regulatory agencies.

Further, this letter of availability of potable water and sanitary sewer service is to be utilized for Planning text amendment only. Individual letters of availability will be required for the purpose of obtaining building permits.

Sincerely,

Ohdet Kleinmann

LEE COUNTY UTILITIES
Public Utilities Manager



Alico Road

Harper Property Holdings 3 LLC

Legend

-  Map Amendment Properties
-  Eligible Parcels

San Carlos Park Protection

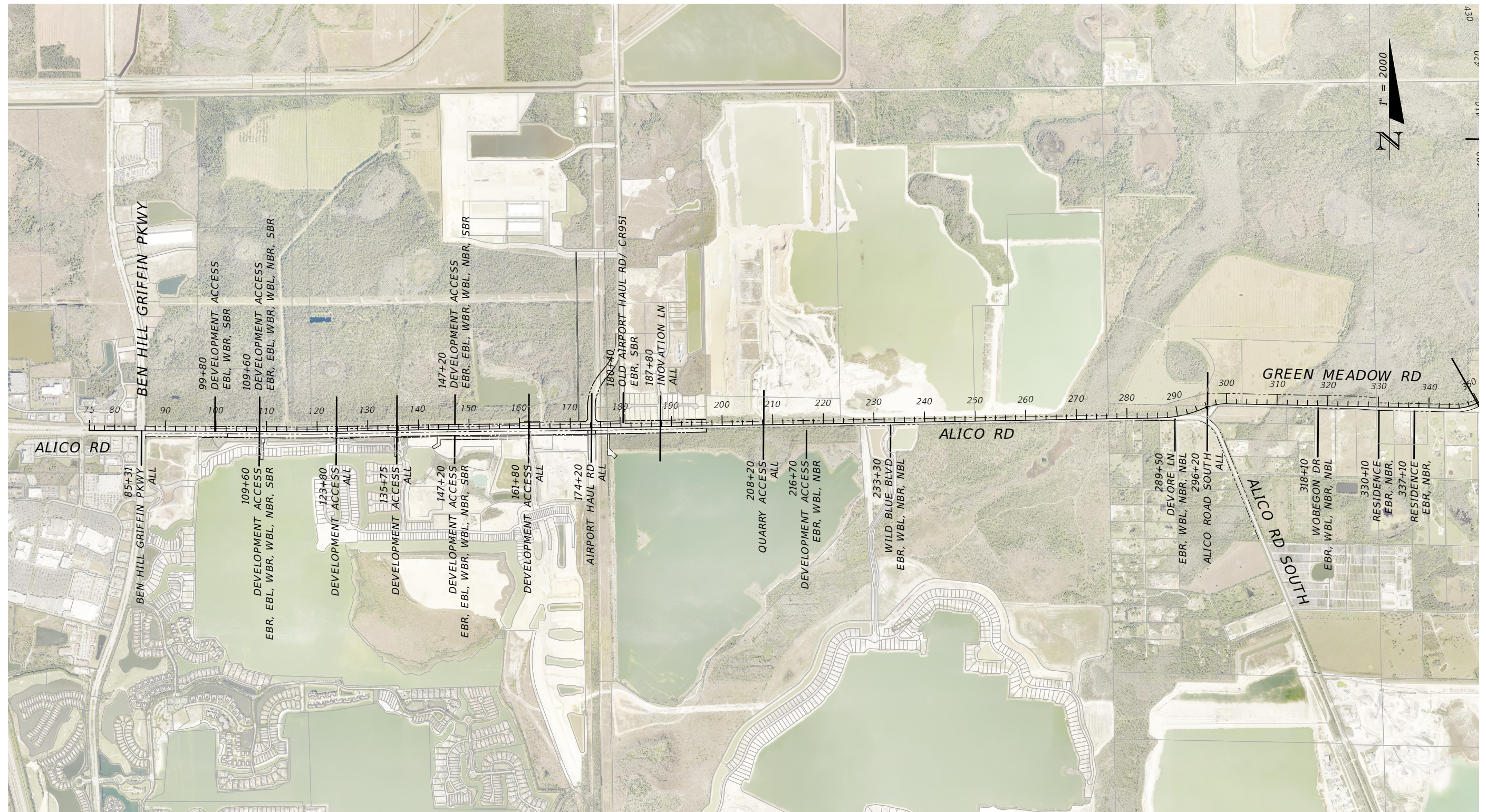
Harper Property Holdings 3 LLC

14800 Alico LLC

14800 Alico LLC

Jacob and Whitney Huffman Trust





REVISIONS			
DATE	DESCRIPTION	DATE	DESCRIPTION
00/00/00	ADOPTED PER RESOLUTION #00-00-00		

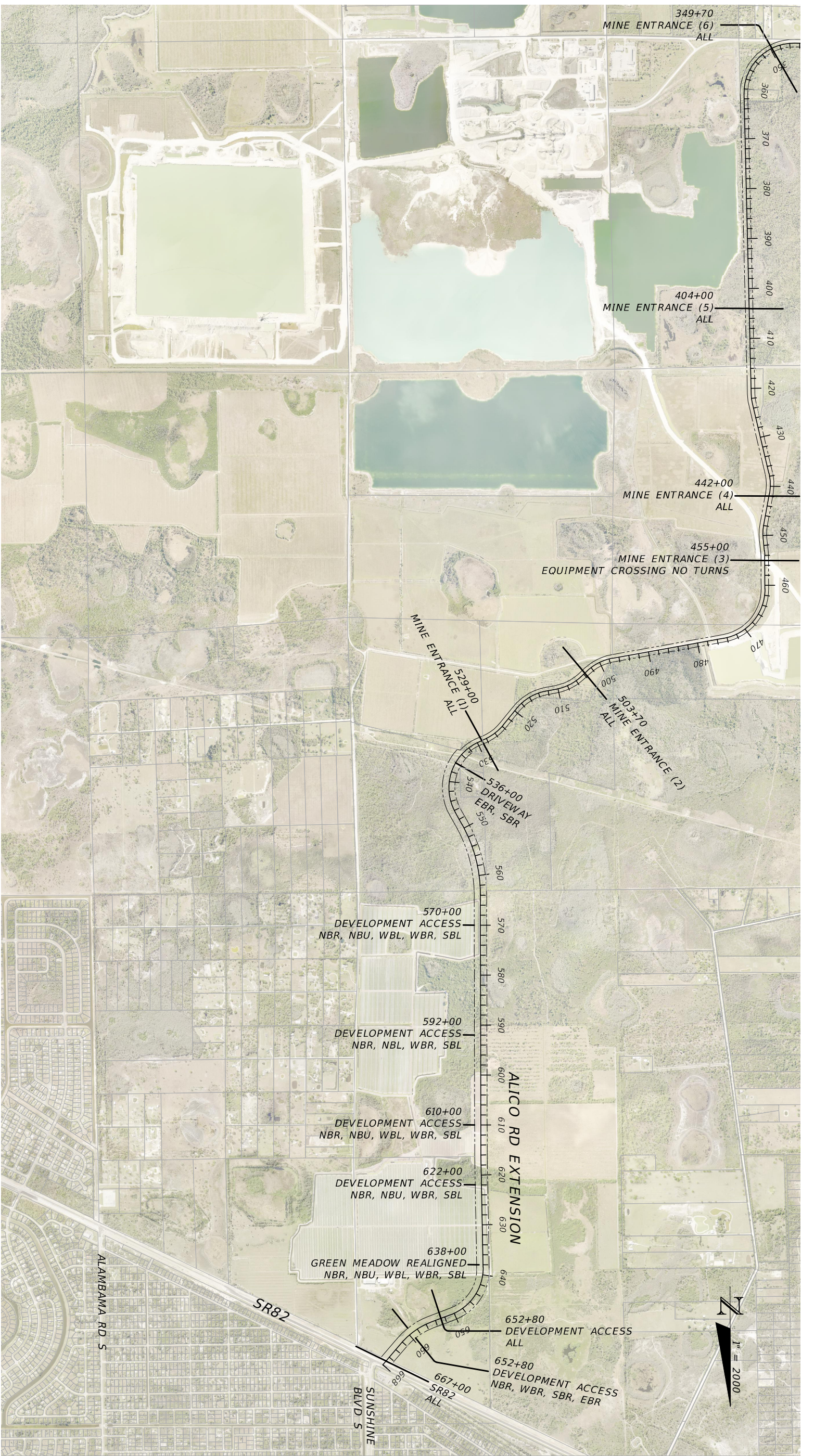
LEE COUNTY DEPARTMENT OF TRANSPORTATION		
ROAD NAME	COUNTY	PROJECT ID
ALICO RD	LEE	21014

ALICO RD EXTENSION
DESIGNATED ACCESS POINTS

EXHIBIT B

1 OF 2

THE OFFICIAL RECORD OF THIS SHEET IS THE ELECTRONIC FILE DIGITALLY SIGNED AND SEALED UNDER RULE 61G15-23.004, F.A.C.



REVISIONS	
DATE	DESCRIPTION
00/00/00	ADOPTED PER RESOLUTION #00-00-00

REVISIONS	
DATE	DESCRIPTION

LEE COUNTY DEPARTMENT OF TRANSPORTATION		
ROAD NAME	COUNTY	PROJECT ID
ALICO RD	LEE	21014

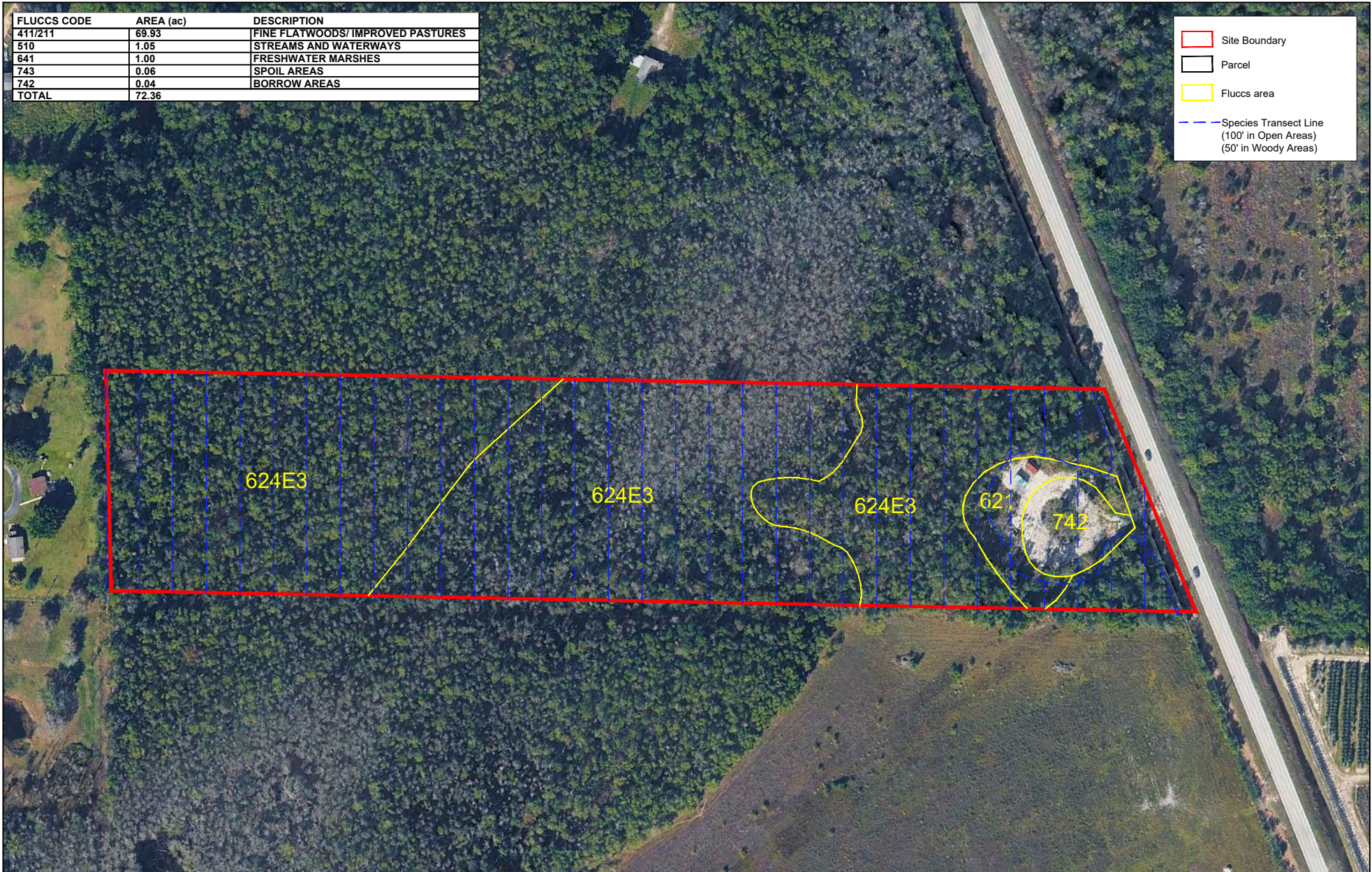
ALICO RD EXTENSION DESIGNATED ACCESS POINTS	
EXHIBIT B	2 OF 2

Gagnon, Victor 4/5/2021 1:09:32 PM

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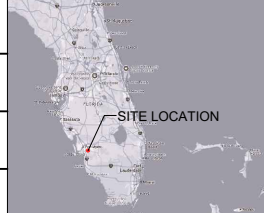
FLUCCS CODE	AREA (ac)	DESCRIPTION
411/211	69.93	FINE FLATWOODS/ IMPROVED PASTURES
510	1.05	STREAMS AND WATERWAYS
641	1.00	FRESHWATER MARSHES
743	0.06	SPOIL AREAS
742	0.04	BORROW AREAS
TOTAL	72.36	

Site Boundary
 Parcel
 Fluccs area
 Species Transect Line
 (100' in Open Areas)
 (50' in Woody Areas)



SYNECOLOGICAL
ANALYSTS
 ENVIRONMENTAL EVALUATION AND ADVOCACY
 2159 Morning Sun Lane
 NAPLES, FLORIDA 34119
 PHONE: (239) 514-3998
 www.synecol.com

PROJECT: FLUCCS Map 10351514
 LOCATION: 14700 Alico Rd Fort Myers FL 33913
 DATE: NOVEMBER 2025
 DRAWN BY: JET



A north arrow pointing up, with 'N', 'S', 'E', and 'W' labels.
 A scale bar showing 0, 100, 200, and 250 feet.