

**PROVIDENCE N-27
ALTERNATIVE SITES ANALYSIS**

This information is provided in support of the permit application for the Providence N-27 project, specifically regarding alternative sites considered for development of a retail center.

Project Purpose:

Providence is a Development of Regional Impact (DRI). As part of the DRI approval process, the site plan was to be self-sustaining to include the necessary amenities for the homeowners. The approval process required a commercial facility which in this instance consists of a food center with associated retail stores for the homeowners. Approval of the original site plan required the dedication of this type of facility in an area which had adequate traffic capacity and was located within the boundaries of the DRI to provide services to the Providence community which resulted in the location of the food center at the intersection of Poinciana Parkway and State Road 17-92.

Project Site Criteria:

The project site must meet certain criteria to meet the Project Purpose. The Project Purpose is specifically for retail development to provide services for the people living within the Providence DRI and was located adjacent to an adequate road network. These requirements resulted in the project being located at the intersection of Poinciana Parkway and US 17-92 in Polk County, Florida. This Project Purpose limits the available alternatives because there are limited properties available of sufficient size to support the proposed development, are on the real estate market for sale and in an area to serve the people living within the Providence DRI. These requirements resulted in the proposed location which has direct frontage on Poinciana Parkway and has enough developable square footage (76,000 square feet) for the proposed facilities. Per the county zoning which included a commercial facility encompassing 100,000 square feet as part of the DRI. An evaluation of several off-site alternative locations and on-site No Action alternatives to eliminate or reduce the discharge of fill material into waters of the U.S. (WOTUS) was conducted.

Polk County experienced a 20.4% growth rate between 2010 and 2020 (U.S. Census Bureau). Polk County is also listed as Florida's 9th most populous county (Office of Economic and Demographic Research, 2017). With increased population comes the need for more retail services, which the Providence N-27 project provides.

The 33± acre Providence N-27 tract is a proposed retail development with associated infrastructure and required stormwater management facilities to serve the people of the Providence development. The location for such a development was chosen based on the presence of certain criteria. The Applicant included the following criteria in the alternative site selection process for the Providence N-27 project:

| Criteria | Measurement and/or constraint |
|--|---|
| Frontage on Poinciana Parkway/US 17-92 | √ Direct access to Poinciana Parkway and US 17-92 |
| Available for purchase | √ Owned |

| | |
|---------------------------------------|--------------------------------|
| Within budget | √ Owned |
| Minimum Size | √ 33 acres |
| At least 76,000 sq ft of retail space | √ 76,000 sq ft of retail space |

Preferred Alternative

The Applicant’s preferred site (“Preferred Site”) considering the requirements of the DRI and a location and size which provides and adequate footprint for the proposed facility. The requirements resulted in the selection of the proposed 33± Providence N-27 project site as designed and submitted to the Florida Department of Environmental Protection (FDEP) for approval. The preferred site meets all of the above criteria and was required as part of the original DRI. The Preferred Site has room for over 43,000 square feet of grocery space; over 33,000 feet of additional retail space; has direct access to Poinciana Parkway and US 17-92; is owned by the Applicant and is located within the boundaries of the DRI.

The county approved 100,000 square feet for a commercial facility. Even though the county approved the site for 100,000 square feet of commercial construction, the site plan was configured to minimize wetland impact which included staying out of the forested wetland that is part of the southern portion of the site. The site plan and minimization of wetland impacts was very difficult due to the cemetery that was discovered after land acquisition and the approval of the DRI. An archeological evaluation was conducted prior to the purchase of the land and the first design for the commercial area. This archeological evaluation determined that there was a cemetery with a total of 4 graves. During the permit process with the ACOE, the ACOE archeologist requested a ground penetrating radar survey (GPRS). The survey revealed that there was a total of 102 graves which covered an expansive area that was in the center of the original site plan. After the GPRS, the site plan was modified resulting in a footprint that considered wetland minimization resulting in a construction footprint that avoided the cemetery and the higher quality wetlands. The proposed site plan resulted in 9.5± acres of direct and secondary impacts to jurisdictional wetlands. In order for the project to be possible, wetland impacts will be required and cannot be avoided entirely. The site plan had to take in account several constraints including two major roads and the preservation of the cemetery including a buffer that varied with a minimum width of 50 feet. Per the requirements of the ACOE when this project was previously permitted, the cemetery had to be preserved and protected by a fence. The cemetery has already been fenced to meet the ACOE permit requirements previously granted for the N-27 site. The mitigation for the wetland impacts has already been purchased except for two small, isolated wetlands which the ACOE previously did not claim under WOTUS. To prevent a delay in permitting due to the EPA likely appealing the claim that these areas do not meet the WOTUS criteria, the applicant is going to agree that they are jurisdictional.

No Action Alternative

There are two “No Action” Alternatives to be considered for this project. The first is to reconfigure the development to avoid any discharge of dredged or fill material into WOTUS and to avoid the cemetery. The second is to not implement the project at all.

Onsite Alternative 1 – Reconfiguration, No Wetland Impacts

It is not possible to reconfigure the project to avoid discharge of dredged or fill material



into WOTUS. If impacts to Wetlands 1, 2, and 3 were completely avoided along with the boundaries of the cemetery, the project site would not have enough developable acreage to meet the needs of the project.

The wetland impacts are for stormwater ponds, buildings, and portions of a parking lot. The site plan includes 43,000 square feet of grocery space and 33,000 square feet of retail space. As the project design was required to meet the criteria for the SWFWMD and the county and preserve the cemetery and a buffer along its boundary, the project footprint and infrastructure would not fit within the uplands. The majority of impacts to W-3 are for the construction of a stormwater pond.

Onsite Alternative 2-Reconfiguration, Less Wetland Impacts

This onsite alternative reduces the wetland impact acreage by approximately 4 acres. In order to facilitate this, the amount of retail space had to be cut by 33,000 square feet, which nearly reduces the available retail space by half (**Exhibit A**). The DRI that was put into place that covers Providence N-27 requires retail facilities to serve the Providence Community and specifies that shopping centers are required. This onsite alternative does not meet the project purpose of having over 76,000 square feet of commercial and retail space and therefore is not a feasible option.

Onsite Alternative 3– No Project

Polk County is also listed as Florida’s 9th most populous county (Office of Economic and Demographic Research, 2017 Polk County experienced a 20.4% growth rate between 2010 and 2020 (U.S. Census Bureau). It is important that more food stores and retail options be provided within the region to keep up with the ever-expanding need from the growing community. This is also consistent with the requirements of the DRI. If the Providence N-27 project were not to be implemented at all, then the demand for this fast-growing area would be hindered and the requirements of the DRI would not be met.

This No Action Alternative does not meet the Project Purpose and is not a practicable or feasible alternative.

Off-site Alternatives

Several alternate sites were considered in close proximity to the target area for the project (off of Poinciana Parkway in Polk County). The following specific properties were considered for the Providence N-27 project site. The location of each of these properties is depicted on the attached map (**Figure 1**).

| Off-site locations and configurations | |
|--|---|
| Alternate Site 1- Gotts Family Properties, LLC | <ul style="list-style-type: none"> × No Frontage on Poinciana Parkway × 4.94 acres × Not available for purchase × Not owned/within budget. √ Wetland impacts not needed for development. × At least 76,000 sq ft available for retail space x Ingress and egress problems due to its location being near the intersection of State Road 17-92 and Ronald Reagan Parkway. |

| | |
|---|--|
| | |
| Alternate Site 2 – Wilmer D. Byrd | <ul style="list-style-type: none"> √ Frontage on Poinciana Parkway √ Wetland impacts not needed for development. × 1.83 acres × Not available for purchase × Not owned/within budget. × At least 76,000 sq ft available for retail space. |
| Alternate Site 3 – JAT Investment Group | <ul style="list-style-type: none"> √ 39.7 acres × Wetland impacts needed for development. × Frontage on Poinciana Parkway × Not available for purchase × Not owned/within budget. √ At least 76,000 sq ft available for retail space × Ingress and egress is a problem due to the lake to the north. Boarded private property to the west and adjacent to the intersection of State Road 17-92 and Ronald Reagan Parkway. |

Alternate Site 1 – Gotts Family Properties, LLC

The Gotts Family Properties site available for development is located south of Poinciana Parkway and immediately west of US 17-92. The property is a total of 4.94± acres. This makes the property too small to serve the purpose of the retail facilities proposed and renders the property infeasible for the current project. It does not contain any wetlands or surface waters. Additionally, the proposed project needs direct frontage on Poinciana Parkway. This project site would not meet the objectives of the Project Purpose.

Alternate Site 2 – Wilmer D. Byrd

There is an approximately 1.83± acre property owned by Wilmer D. Byrd that has direct frontage on Poinciana Parkway. It does not contain any wetlands or surface waters. However, it does not meet the minimum size requirements that the proposed retail development needs in order to be built. Additionally, it is not available for purchase. This project site would not meet the objectives of the Project Purpose.

Alternate Site 3 – JAT Investment Group

The JAT Investment Group property is approximately 39.8± acres. It does have direct frontage on Poinciana Parkway and is currently zoned residential. This property also has approximately 21 acres of wetlands and surface waters onsite (**Figure 2**). Purchasing this property along with mitigating wetland impacts would make the project infeasible. This project site would not meet the objectives of the Project Purpose.

Alternatives Comparison

This matrix can be used to identify any remaining practicable alternatives. This matrix is presented in Table 3.

Table 3. Practicability Matrix.

| Category | Practicability Factor | Preferred Site | No Action Alternative 1 - Reconfiguration | No Action Alternative 2 – No Project | Alternate Site 1 | Alternate Site 2 | Alternate Site 3 |
|--------------|--|----------------|---|--|------------------|------------------|------------------|
| Availability | Available for Acquisition? | YES (owned) | YES (owned) | N/A- because no development would occur | NO | NO | NO |
| | Appropriate developable square footage | Yes | No | N/A- because no development would occur | NO | NO | NO |
| | Appropriate Size? | YES | YES | N/A- because no development would occur | NO- too small | NO- too small | YES |
| Cost | Reasonable Acquisition Cost? | YES (owned) | YES (owned) | N/A- because no development would occur | NO | NO | NO |
| | Costs feasible with wetland impact mitigation? | YES | N/A – no costs because no development would occur | N/A– no costs because no development would occur | NO | NO. | NO |
| Logistics | Direct frontage on Poinciana Parkway | YES | YES | N/A- because no development would occur | NO | YES | YES |
| Wetlands | Wetland impacts needed for development | YES | NO | N/A- because no development would occur | NO | NO | YES |

As presented in the discussions above for the Alternate Sites and No Action Alternatives, the Preferred Site is the most appropriate and practicable alternative available to meet the Project Purpose. Alternate Sites 1, 2, and 3 are either too small, have traffic ingress and egress problems, not within budget or have a large amount of wetlands and surface waters on site. An alternate configuration to the Preferred Site to reduce the amount of wetland impacts proposed is not feasible due to the adjacent road constraints and the cemetery. This would result in no project being able to be built and would be in conflict with the requirements of the DRI and the previous permits granted by the ACOE. None of the considered alternatives represent the most practicable development alternative.

Least Environmentally Damaging Practicable Alternative (LEDPA)

The purchase of mitigation credits will better serve the net function and habitat connectivity of wetlands in this basin than the preservation of the wetland that is being impacted. The ecological functions and benefits of the impacted wetland area have been dramatically reduced due to the sabal transmission line and State Road 17-92 abutting the land to the west, Poinciana Parkway to the north, a self-storage facility to the east and a large bay swamp to the south. By reducing impacts to the largest extent possible to the bigger wetland system to the south, Wetland 3, this meets the criteria of LEDPA.

References:

Office of Economic and Demographic Research. 2022. Population and Demographics, Area Profiles. Polk County. <http://edr.state.fl.us/content/area-profiles/county/polk.pdf>.

EXHIBIT A



-  Providence N-27
-  Alternate_Site_1
-  Alternate_Site_2
-  Alternate_Site_3

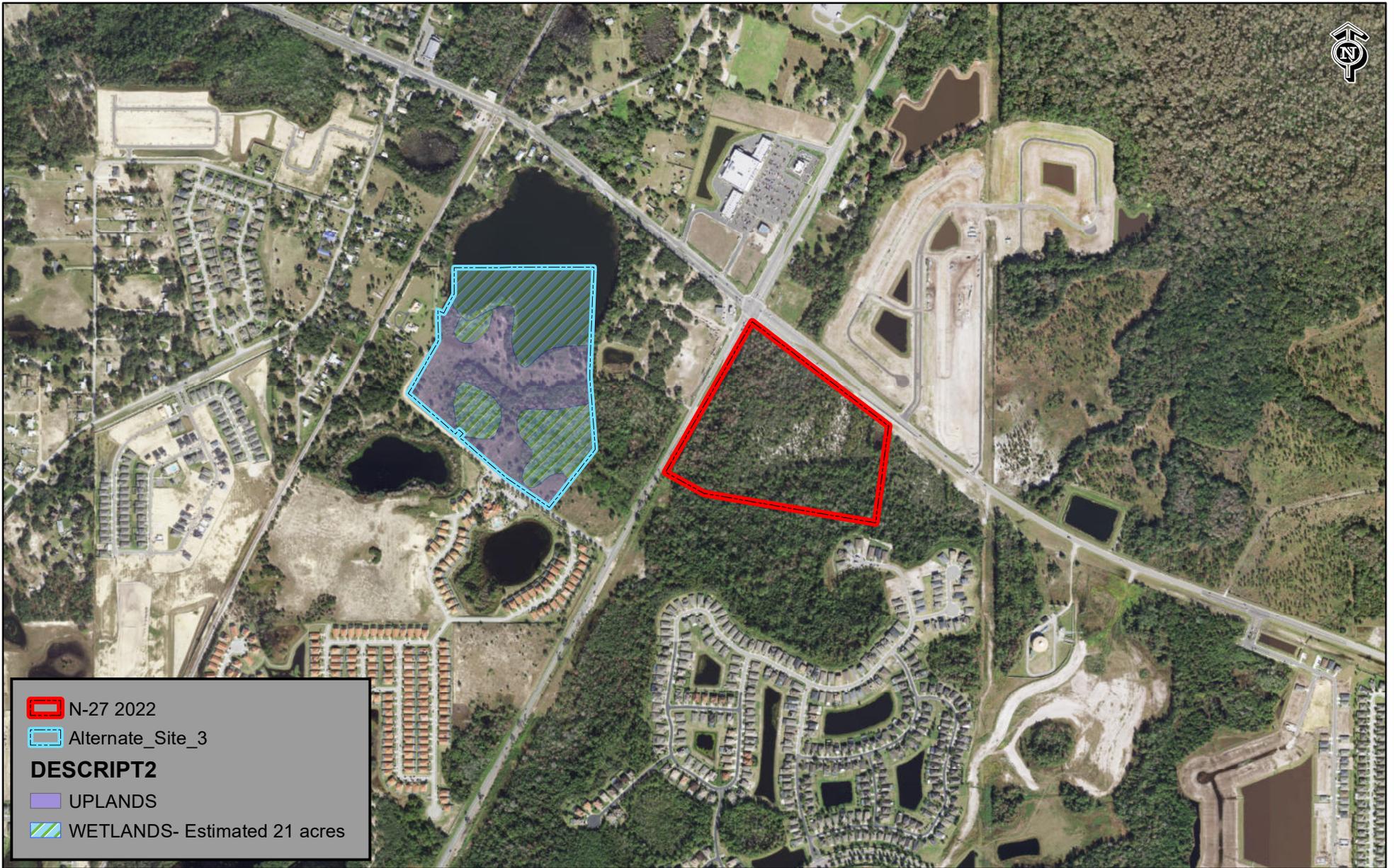
Providence N-27

Alternative Sites Map
Sections 19 & 30, T26S R28E
Polk County, Florida



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FIGURE 2



-  N-27 2022
-  Alternate_Site_3
- DESCRIPT2**
-  UPLANDS
-  WETLANDS- Estimated 21 acres

Providence N-27

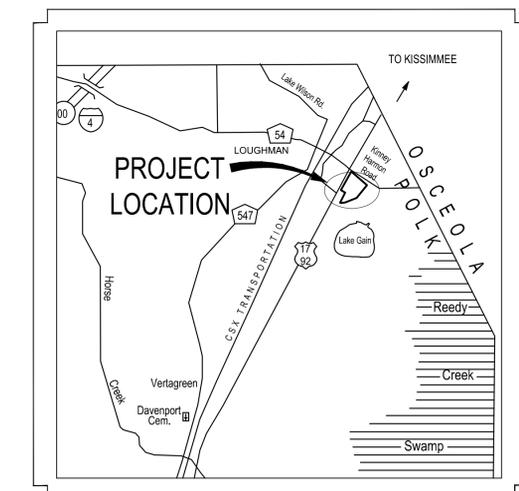
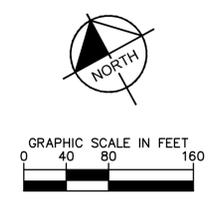
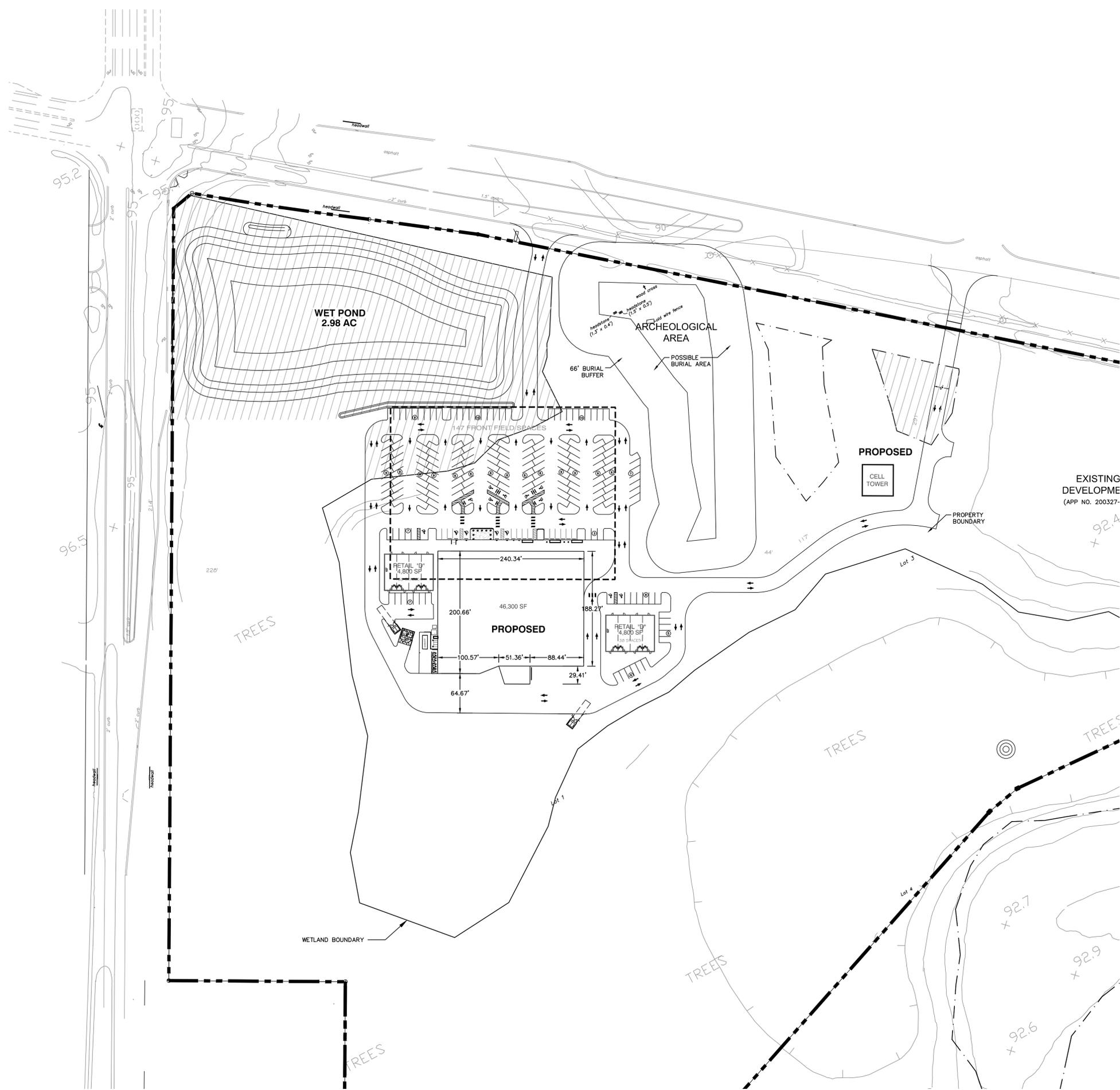
Figure 2- Alternative 3 Wetlands Map
Sections 19 & 30, T26S R28E
Polk County, Florida



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FIGURE 1

Plotted By: E:\dberg, Tim_Sheet_Sett/Kha_Layout1_May 16, 2023_02:10:05pm K:\LAK_Civil\049853\01 - PROVIDENCE N27\CADD\EXHIBITS\2023-05-16_ERP_Concept_Site_Plan.dwg
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SITE DATA:

| | |
|-------------------------------|---|
| AREAS: | |
| PARCEL AREA | 22.6± AC |
| OUT PARCEL 1: | 0.31± AC |
| RETAIL: | 21.72 AC |
| ZONING AND LAND USE | |
| EXISTING ZONING: | VACANT/RESIDENTIAL |
| EXISTING LAND USE: | RONALD REAGAN PKWY SELECTED AREA PLAN, CACX |
| BUILDING SETBACKS: | |
| NORTH SIDE (KINNEY HARMON RD) | 50 FT |
| WEST SIDE (US HWY 17-92) | 50 FT |

 **AREA OF WETLAND IMPACTS**
 5.01± ACRES

| NO. | REVISIONS | DATE | BY |
|-----|-----------|------|----|
| | | | |
| | | | |

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| | |
|-------------|----------|
| KHA PROJECT | 049853 |
| DATE | MAY 2023 |
| SCALE | AS SHOWN |
| DESIGNED BY | |
| DRAWN BY | |
| CHECKED BY | |

CONCEPTUAL SITE PLAN

RETAIL SPACE AT PROVIDENCE N27
 PREPARED FOR
APPLIED BUILDING DEVELOPMENT COMPANY-OAKHILLS, INC.
 POLK COUNTY FLORIDA

SHEET NUMBER
CSP-07