

5/16/2022

RE: Corkscrew Grove SA and DA

Lee County Hearing Examiner,

There is no automatic right in the Lee Plan for an applicant to be allowed to mine on a property, or obtain higher residential densities or commercial intensity, than the Lee Plan allows. We constantly hear from scientists about various species' decline due to habitat loss caused by human activity. Government too often looks at the impact of each development individually instead of looking at the cumulative effect. Does Lee County take Objective 123.3 seriously?

OBJECTIVE 123.3: WILDLIFE. Maintain and enhance the fish and wildlife diversity and distribution within Lee County for the benefit of a balanced ecological system. (Ord. No. 94-30, 18- 28)

POLICY 123.3.1: Encourage upland preservation in and around preserved wetlands to provide habitat diversity, enhance edge effect, and promote wildlife conservation. (Ord. No. 18-28) Conservation and Coastal Management VII-10 November 2021

POLICY 123.3.2: Participate in the development of a regional plan to identify and protect areas utilized by wildlife, including panthers and bears, so as to promote the continued viability and diversity of regional species. (Ord. No. 92-48, 18-28)

The property in question is a large chunk of land which, if approved as proposed in the agreement, will add significantly to the problem of habitat loss. DR/GR was meant as a low density area. The county would be giving away low density land (1 d/u per 10 acres) for much higher density development (1.5 d/u per acre). The roads needed and the near certainty that this would promote additional high density development in the area adds to the inconsistency with Objective 123.3.

The process being used circumvents the normal application process, provides for less public input, is not necessary, and is a disservice to county residents. Massively increasing residential density almost 7 times over what is currently allowed in a rural part of the county is not in the public interest.

We have a considerable amount of DR/GR in the Bayshore Community and we're very concerned about precedents being set for it's future.

We fully support the statement made by SCCF and the Conservancy of Southwest Florida. Please include our comments in the record.

Thank you,

Steve Brodtkin

Vice President CCBC (Concerned Citizens of Bayshore Community)

Also Representing:

WFBL (Women for a Better Lee)

PUBLIC'S EXHIBIT # 1
Steve Brodtkin



Sent via email

Date: 5-17-22

To: Ms. Donna Marie Collins, Lee County Hearing Examiner

From: John Cassani, Calusa Waterkeeper

Re: Corkscrew Cove Limited Partnership v. Lee County, Case No. 19-CA-8183

Calusa Waterkeeper (CWK) has several concerns with the apparently incomplete information advertised in a legal ad for this case on May 6, 2022. Consistent with our mission to protect and restore waters within our project area including but not limited to Lee County, Estero Bay and its tributaries.

Our concerns can be summarized accordingly:

1. Environmental impacts of non-point source water pollution from motor vehicles and associated costs for water restoration is well documented in the U.S (note referenced excerpts below). Pollutants originating from the operation of motor vehicles and roadway maintenance are conveyed by stormwater runoff and include heavy metals, suspended solids, nutrients, and hydrocarbons among others. Additional motor vehicle trips at build out is estimated by the applicant at 95,198 daily two-way trips. The estimated additional motor vehicle traffic, stemming from the proposed Kingston development would transform the existing rural setting to a highly urbanized landscape, and create a significant additional pollutant source within the Estero Bay watershed. A conservative estimate of 10 miles per two-way daily trip within the Estero Bay Watershed, coming and going from the Kingston development, would yield 951,980 vehicle miles traveled per day. At a 2008 estimate of \$0.011 (excluding costs associated with oil spills and road salting) per vehicle mile for water runoff impacts attributed to state highways (FHWA 2008), the additional vehicle miles would create a cost of \$10,471 (2008 dollars) per day in water quality impacts within the Estero Bay Watershed. A public cost of this significance would be an unreasonable burden to residents of the Lee County Estero Bay Watershed and contrary to the public interest.
2. The downstream receiving water from the proposed Kingston development is the Imperial River which is currently verified impaired by the Florida Department of Environmental Protection (2020 FDEP Comprehensive Statewide Verified List) for iron,

copper, nutrients, dissolved oxygen and fecal indicator bacteria. The Imperial River discharges to Estero Bay which is an Outstanding Florida Water that was verified impaired for nutrient pollution by FDEP in 2019. Adding additional pollutants stemming from a massive increase in motor vehicle traffic as just one potential source is also contrary to the public interest.

3. Non-motor vehicle sourced pollutants common to residential and commercial developments that will discharge from this development into the Corkscrew Regional Ecosystem Watershed and ultimately to the Imperial River and Estero Bay will further degrade downstream water resources. Permitting of stormwater discharge through Lee County's MS4 stormwater program gives no assurance that state water quality standards will be met. The rate of water quality impairment has increased by 36 percent in Lee County between 2018 and 2020 based on FDEP's 2020 statewide list of verified impaired waters. Most of the water quality impairments described here stemmed primarily from widespread residential and commercial development in coastal areas over the past 20+ years in Lee County. Extending the water quality impacts of increased motor vehicle traffic and residential and commercial development inland to existing rural areas and upstream of already impaired waters will further exacerbate water quality decline as retrofitting existing urban stormwater treatment systems is unlikely to occur.
4. In addition to the reasons stated above, the public's interest is not protected by the proposed density of residential units and commercial properties proposed in a remote area of rural Lee County and within the Density Reduction Groundwater Resources land use category. The public is entitled to an appropriate review of such an impactful change to a rural Lee County community. The acreage included in the earlier mining permit application and the additional 2,474 acres not originally included should be separated from the settlement agreement and be required to obtain any development permits according to the County's adopted Comprehensive Plan and Zoning process.

For the probable water quality impacts, associated costs and outcomes of the proposed Kingston development, CWK recommends that you advise the Lee Board of County Commissioners that the proposed settlement agreement for the Kingston development is not in the public interest.

Published excerpts on environmental impacts of non-point source water pollution from motor vehicles:

Substantial evidence suggests that residues from the operation of motor vehicles contribute heavily to non-point source and groundwater pollution (Davis et al. 2001; Kayhanian et al. 2003).

Pollutants from motor vehicles or from transportation infrastructure include sediments (from construction or erosion), oils and grease (from leaks or improperly discarded used oil), heavy metals (from car exhaust, worn tires and engine parts, brake pads, rust, or used antifreeze, road salts, as well as fertilizers, pesticide, and herbicides (used alongside roads or on adjacent land); (Hill and Horner 2005).

EPA (1997) estimates that up to 1/2 of suspended solids and 1/6 of hydrocarbons reaching streams originate from freeways. Vehicle-related particulates in highway runoff come mostly from tire and pavement wear (~ 1/3 each), engine and brake wear (~ 20%), and exhaust (~ 8%) (EPA 1996).

Heavy metals in highway stormwater runoff are of particular concern because of their toxicity, pervasiveness, and persistence. In an early study, Ellis et al. (1987) find that heavy metals can make highway runoff chronically toxic to receiving waters.

Davis et al., (2001) reported that pollutant loads typically follow the pattern: Zn (20-5,000 [g/l) > Cu H Pb (5-200 [g/l) > Cd (< 12 [g/l). Their empirical study reveals that brake wear is the largest contributor to copper loading (47%) in urban runoff while tire wear contribute 25% of zinc loading, the second largest after buildings.

Kayhanian et al. (2003) specifically study the impact of VMT on highway runoff pollutant concentrations. As expected, pollutant concentrations are higher (two to ten times) for urban than for non-urban highways.

Highway stormwater runoff has also generated significant concerns for public health. Gaffield et al. (2003) examined the public health impacts from heavy metal in stormwater, which can often be traced to motor vehicle sources.

According to Van Metre et al. (2000), vehicles are a significant source of polycyclic aromatic hydrocarbons (PAHs) in water bodies.

Driscoll et al. (1990) report detectable levels of zinc, lead, copper, and nitrate/nitrite in road runoff, with urban levels two to five times those of rural levels.

Disc brakes, however, are open to the environment, so each time semi-metallic brake pads squeeze against the wheels' rotors, tiny amounts of metal dust, often copper but sometimes also zinc and lead, are deposited along the roadway and washed to water bodies by rain or snow (Nixon and Saphores 2007). Runoff from roads and parking lots has a high concentration of toxic metals, suspended solids, and hydrocarbons, which originate largely from automobiles. Highway runoff is toxic to many aquatic species.⁴ Table 5.15.3-1 shows pollution measured in roadway runoff (Bannerman et al. 1993).

Table 5.15.3-1 Pollution Levels in Road Runoff Waters (micrograms per litre)⁵

Pollutant	Urban	Rural	Pollutant	Urban	Rural
Total suspended solids	142.0	41.0	Nitrate + Nitrite	0.76	0.46
Volatile suspended solids	39.0	12.0	Total copper	0.054	0.022
Total organic carbon	25.0	8.0	Total lead	0.400	0.080
Chemical oxygen demand	114.0	49.0	Total zinc	0.329	0.080

From Bannerman et al. 1993.

Published excerpts of costs associated with motor vehicle sources of pollutants to surface waters through non-point source runoff.

Combining the above estimates for groundwater and highway runoff pollution control gives a present value of costs ranging from \$51.8 billion to \$268.5 billion with BMPs for principal arterials only, and of \$74.8 billion to \$394.5 billion with BMPs along all arterials. These estimates are driven by highway runoff control costs, which dominate groundwater pollution costs almost by an order of magnitude (Delucchi (1998; 2000).

These large costs reflect the reach of the US transportation system, but also the need to protect water quality although most of the current infrastructure was not designed to address this problem. Under our scenarios, these estimated control costs would represent a large drag on public budgets over many years, but cleanups are mandated by law and they are consistent with the “polluters pay” principle. It is therefore essential to carefully weigh policy options (Nixon and Saphores 2007).

Our inquiry shows that the costs of controlling the impacts of motor vehicles on water quality are Substantial (Nixon and Saphores 2007).

Transport 2021 estimates external water pollution costs from automobile use to be 0.2¢ Canadian per km, or 0.25¢ U.S. per VMT, based on a review of studies (KMPG 1993).

Motor vehicle emissions increase levels of PAHs (polycyclic aromatic hydrocarbons) in urban surface waters as much as 100 times higher than pre-urban conditions, poisoning aquatic wildlife and disturbing ecological systems (Van Metre et al. 2000).

State highways account for approximately 5% of U.S. road miles, 10% of lane miles, and carry about 50% of VMT (FHWA 1993). An estimated 300 million off-street parking spaces increase road surface area 30%, and 50% in urban areas (Commercial parking estimate from Douglass Lee (1993). This indicates that *state* highway runoff impacts can be conservatively estimated at one-third of *total* roadway impacts, so the middle value of WSDOT highway runoff mitigation cost estimates (\$218) is tripled to include other roads, parking, and residual impacts ($\$218 \times 3 = \655 million), and scaled to the U.S. road system ($\$655 \times 50$) for total annual national runoff costs of \$33 billion.

A total of \$33 billion (conservatively excluding the cost of oil spill \$2.7 billion and road salting \$6.7 billion) per year; divided by the approximately 3,000 billion miles driven annually in the US (2008) gives 1.1¢ per automobile mile (base formula from FHWA 2008).

Literature Cited

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and zinc in urban runoff from specific sources. *Chemosphere*, 44, 997-1009.

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FHWA 1992, *Annual Statistics*, (www.fhwa.dot.org). Assuming that interstates, freeways and principal arterials represent state facilities, and other roads are locally owned.

FHWA (2008), *April 2008 Traffic Volume Trends*, (www.fhwa.dot.gov/ohim/tvtw/tvtpage.htm).

Gaffield, S. J., Goo, R. L., Richards, L. and Jackson, R. J. (2003). Public health effects of inadequately managed stormwater runoff. *American Journal of Public Health*, 93(9), 1527-1533.

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Van Metre, P. C., Mahler, B. J. and Furlong, E. T. (2000). Urban sprawl leaves its PAH signature. *Environmental Science & Technology*, 34(19), 4064-4070.

Perez, Maria

From: Collins, Donna Marie
Sent: Monday, May 16, 2022 1:54 PM
To: Perez, Maria
Subject: FW: Case 19-CA-008183 - Corkscrew Grove Limited Partnership, Old Corkscrew Plantation Settlement
Attachments: 5-16-22 OCPKingstonSCCFCOSWFL.pdf

Please print this email and attachment

Donna Marie Collins
Lee County Hearing Examiner



Patience is the companion of wisdom - Saint Augustine

From: Julianne Thomas <JulianneT@conservancy.org>
Sent: Monday, May 16, 2022 11:58 AM
To: Collins, Donna Marie <COLLINS@leegov.com>; Hearing Examiner <hex@leegov.com>
Cc: Jacob, Michael <MJacob@leegov.com>; Dunn, Brandon <BDunn@leegov.com>; Dist1, Kevin Ruane <DIST1@leegov.com>; Dist2, Cecil Pendergrass <dist2@leegov.com>; Dist3, Ray Sandelli <dist3@leegov.com>; Dist4, Brian Hamman <dist4@leegov.com>; Dist5, Frank Mann <Dist5@leegov.com>; Matt DePaolis <mdepaolis@sccf.org>; nicole johnson <nicolej@conservancy.org>; 'Holly Schwartz' (hschwartz@sccf.org) <hschwartz@sccf.org>; Steve Brodtkin (Steveb239@aol.com) <Steveb239@aol.com>; 'RBlacksmith@camerattacompanies.com' <RBlacksmith@camerattacompanies.com>
Subject: [EXTERNAL] Case 19-CA-008183 - Corkscrew Grove Limited Partnership, Old Corkscrew Plantation Settlement

Please find attached comments from the Sanibel-Captiva Conservation Foundation and the Conservancy of Southwest Florida regarding the settlement and development agreements for the Old Corkscrew Plantation property. Please add the attached letter to the case file and please consider our objections to the addition of 2,474 acres to the denied mine site as part of a development agreement when making your recommendations. If you have any questions or need additional information, please let me know.

Julianne Thomas
Senior Environmental Planning Specialist
Conservancy of Southwest Florida

Receive updates from Lee County Government by [subscribing to our newsletter](#)

Please note: Florida has a very broad public records law. Most written communications to or from County Employees and officials regarding County business are public records available to the public and media upon request. Your email communication may be subject to public disclosure.

Julianne Thomas
Ex. 1

Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing.



SCCF
SANIBEL-CAPTIVA
CONSERVATION FOUNDATION



CONSERVANCY
of Southwest Florida
OUR WATER, LAND, WILDLIFE, FUTURE.

WORKING *together* TO PROTECT OUR COASTAL WATERS

May 16, 2022

Lee County Hearing Examiner

sent via email

On behalf of the Sanibel-Captiva Conservation Foundation and the Conservancy of Southwest Florida, we are providing comments on the proposed settlement agreement (SA) and development agreement (DA) for the Old Corkscrew Mine property being considered by Lee County. We strongly urge you to find that this agreement as presented does not protect or act in the public interest of Lee County. Adding 2,474 acres to the mine site for development along with entitling 10,000 dwelling units in the environmentally sensitive Density Reduction/Groundwater Resource (DRGR) area will add unnecessary development pressure and be detrimental to the public and Lee County.

Background

In 2019, a mining application for Old Corkscrew Plantation was denied by the Lee County Board of County Commissioners (BOCC) based on the recommendation of the hearing examiner. This mine was to be located in eastern Lee County, almost at the county line. The proposal was to mine 4,202 acres for limerock.

The denied mine would have been located in the DRGR area of Lee County. This means that while the applicant was able to ask for the additional entitlement of limerock mining, mining is not a right in the DRGR for any land. Existing entitlements on the land include agriculture and residential development at 1 dwelling unit (du) per 10 acres.

When Corkscrew Grove Limited Partnership (CGLP) bought the property in 2016, they knew or should have known that getting approval for a mining operation was not guaranteed and was, in fact, speculative development because they had to apply for permission to mine. Mining is not a right inherent with the land. Our organizations supported Lee County in their denial of the mine based on negative environmental impacts and inconsistency with the Lee Plan. This speculative mining application should not trigger a Bert Harris Act settlement, however, Lee County finds itself evaluating a SA and DA pursuant to the Bert Harris Act.

Settlement Agreement & Development Agreement

In reviewing the proposed settlement agreement through the lens of whether it is in the public interest, we are shocked that the settlement agreement is 40% larger than the mine site. The

application for a 4,202 acre mine has ballooned to 6,676 acres, an increase of 2,474 acres. Please note that these 2,474 acres have not, to our knowledge, been part of any application made to Lee County in any capacity. When asked directly about the increase in size, we were told that Lee County is permitted under the Bert Harris Act to increase the project boundaries. However, as the Hearing Examiner, we ask that you evaluate this addition of acreage with regard to whether including this additional property is in the public interest.

While we would express concern about a Bert Harris Act settlement for the 4,202 acres that had a mining application denied, we are extremely concerned about allowing a settlement for a mining application to practically double in size and cross a major road. As such, we believe it is important to evaluate how the community's access to public hearings differs between a Bert Harris settlement and a regularly processed Comprehensive Plan Amendment (CPA).

Lee County staff has stated the number of public hearings is practically the same. This does not appear to be entirely accurate. A CPA would be required for these changes if done through the normal process and not as part of a Bert Harris settlement, along with a Planned Development (PD) application. A CPA requires a neighborhood meeting, a hearing with the Local Planning Agency (LPA), and two hearings with the Board of County Commissioners (BOCC). At each of these meetings, the substance of the development, from the density and uses, to the amount and timing of the conservation easements would be presented and available on the website for the public to review. As of May 12, 2022, there is no application package associated with the changes proposed in the settlement that is available for the public to view or access on the Lee County website.

On page 15 of the joint memo background materials, Lee County states:

Public input into the Agreement is provided through four public hearings, one before the Hearing Examiner, two before the BOCC and one before the circuit court. Based on the foregoing, the public interest served by the rezoning requirement has been fully protected by the Agreement.

However, for a PD going through a normal public hearing process, there would be a HEX proceeding and a BOCC meeting. At the HEX, the details of the development would be at issue including setbacks, schedule of uses, and traffic. The agenda packet would include all the site plans and be available for the public at least a week in advance. If a PD also requires a CPA, the BOCC hearing for the PD is often combined with the second required BOCC hearing for the CPA. However, even under those circumstances, there would be at least 5 separate public meetings, and the public would have access to the materials about the substance of this huge development on Lee County's website.

In this case, the materials are not available online. In this case, the HEX proceeding is not to discuss the details of the development but rather whether this development is in the public interest of Lee County residents. The two BOCC meetings will be to discuss the same topic – at no time will the public ever be meaningful engaged with the substance of the development before the entitlements are committed to through entering into the settlement. In addition, to

characterize a hearing at the circuit court as a meeting that would allow for meaningful public input to the extent it can be considered a public hearing like Lee County or a developer would hold is incorrect.

In addition, we would like to highlight other statements in the memorandum that we are concerned are misleading or incorrect.

Page 7 states:

While the density will exceed the maximum standard density of 1 du/10 acres, the Agreement proposes to utilize the density adjustments permitted under Objective 33.2.

The density adjustments under Objective 33.2 allow up to 1 du/acre under specific conditions. This land does not meet the conditions for 1 du/acre, and even if it did, 1.5 du/acre exceeds 1 du/acre. Thus, the agreement is not utilizing density adjustments permitted under Objective 33.2 but rather offers a higher density for the entire 6,676 acres.

Page 7 continues:

While the base density in the Wetlands classification may be exceeded, the density adjustments provided under Objective 33.2 through the EEPKO is being applied which allows density to be calculated at a higher rate on the entire property in exchange for environmental enhancements.

As discussed above, the density adjustments are being exceeded and the EEPKO density adjustments up to 1 du/acre are in return for environmental enhancements on specific properties. To exceed the density of wetlands under this justification is misleading, as it was never contemplated that the EEPKO density adjustments would be applied to wetlands in an attempt to urbanize eastern Lee County.

Page 17 of the memo claims to discuss the higher density. Other than stating public services will be provided, there is no reason given or discussion of how this higher density is in the public's best interest. There is only the following incomplete sentence:

While the density of the proposed development is greater than what would typically be allowed.

We are interested in the sentence that is supposed to follow this clause.

The SA is misleading in several ways.

Under Recitals:

1. Paragraph 1 – if CGLP had done their due diligence, they would have known that mining is not guaranteed as of right and that planning to mine the property was not guaranteed but would be considered speculative development.
2. The SA does not identify the mining application size of 4,202 acres.
3. The SA mentions additional property owned but does not state that this additional property is an addition of 2,474 acres, much of it across a main road – Corkscrew Road.

4. The SA provides no reason or justification for increasing the settlement size by 40%.
5. Paragraph 5 does not explicitly note that while mining can be an approved use, it is not a use as of right. This means that in order to mine, the applicant knew or should have known that additional approvals would be required and that those approvals are not guaranteed. This makes reliance on being able to mine speculative development.

Conclusion

In conclusion, our organizations have spent decades working with Lee County, landowners and the community to find environmentally compatible solutions for balancing growth, agriculture, mining and conservation in the DRGR. After careful evaluation of the proposed settlement agreement, we do not believe that expanding the size of development from 4,202 acres to 6,676 acres is consistent with the Bert Harris act. We also do not believe that allowing up to 10,000 dwelling units, approving 700,000 sq ft of non-residential and 240 hotel is in the best interest of the people of Lee County; in fact, these additional entitlements, particularly on the additional 2,474 acres outside the Bert Harris Act, in the environmentally sensitive DRGR area will put unnecessary development pressure on the area and will be detrimental to the public.

We respectfully request that you advise the BOCC that this settlement agreement does not serve the public interest for Lee County, and that any settlement agreement due to the Old Corkscrew Plantation mining denial should be for the 4,202 acres at issue in that application.

Sincerely,

Matt DePaolis
Environmental Policy Director
SCCF
mdepaolis@sccf.org

Julianne Thomas
Senior Environmental Planning Specialist
Conservancy of Southwest Florida
juliannet@conservancy.org

cc:

Michael Jacob, Lee County
Commissioner Kevin Ruane, District 1, Lee County
Commissioner Cecil Pendergrass, District 2, Lee County
Commissioner Ray Sandelli, District 3, Lee County
Commissioner Brian Hamman, District 4, Lee County
Commissioner Frank Mann, District 5, Lee County
Brandon Dunn, Lee County



FROM LEFT TO RIGHT
JUSTIN HOJNACKI – WATER MANAGEMENT DISTRICT, JULIANNE THOMAS – CONSERVANCY OF
SOUTHWEST FLORIDA, LAURA LAYMAN – WATER MANAGEMENT DISTRICT, MELISSA ROBERTS –
WATER MANAGEMENT DISTRICT, NICOLE JOHNSON – CONSERVANCY OF SOUTHWEST FLORIDA

FROM LEFT TO RIGHT:

JOHN POLICARPO – U.S. ARMY CORPS OF ENGINEERS • KEN PASSARELLA – PASSARELLA AND ASSOCIATES (ENVIRONMENTAL CONSULTANT) • LEO MIRANDA U.S. FISH AND WILDLIFE, • SHANE JOHNSON – PASSARELLA AND ASSOCIATES (ENVIRONMENTAL CONSULTANT), • ROXANNA HINZMAN – U.S.FISH AND WILDLIFE, • MARSHALL OLSON – DIRECTOR OF CONSERVATION (AUDUBON), • COMMISSIONER RAY SANDELLI, • CONNIE CASSLER – U.S. FISH AND WILDLIFE, • BECKY SWEIGERT – LEE COUNTY ENVIRONMENTAL, • NIC DeFILIPPO – LEE COUNTY ENVIRONMENTAL, • STEVE LEWIS – ENVIRONMENTAL ATTORNEY





FROM LEFT TO RIGHT

ROXANNA HINZMAN – US FISH AND WILDLIFE, COMMISSIONER RAY SANDELLI, BECKY SWEIGERT – LEE COUNTY ENVIRONMENTAL, SHANE JOHNSON – PASSARELLA AND ASSOCIATES (ENVIRONMENTAL CONSULTANT), CONNIE CASSLER – US FISH AND WILDLIFE, JOHN POLICARPO – US ARMY CORPS OF ENGINEERS, LEO MIRANDA – US FISH AND WILDLIFE, NIC DeFILIPO – LEE COUNTY ENVIRONMENTAL.

RBlacksmith

From: Larry Williams <larry_williams@fws.gov>
Sent: Friday, July 26, 2019 6:31 AM
To: RBlacksmith
Cc: Blaisdell, Muriel M CIV USARMY CESAJ (USA); Steve Lewis; Kenneth Passarella; Shane Johnson; JCameratta; TCameratta; Roxanna Hinzman
Subject: Re: [EXTERNAL] tour

Ray,
I greatly appreciate you and Joe showing us the project. The way you've blended the needs of the residents with the need for conservation is simply incredible. It's an exemplary project, and I'd like to showcase it more. Thank you for the tour and all the excellent work.

Larry

Sent from my iPhone

On Jul 19, 2019, at 7:37 AM, RBlacksmith <RBlacksmith@camerattacompanies.com> wrote:

Muriel and Larry,

As busy as I'm sure your schedules are, we truly appreciated the time you were able to spend with us at our *The Place* development, to physically see the success we've achieved in the environmental restoration creation within the project. It also gave us the opportunity to show you the Verdana/Pepperland Ranch properties prior to our involvement in developing and restoring that site.

We look forward to working closely with you and your staff through the permitting process for Verdana Village.

Thanks,
Ray Blacksmith, President
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