

Brandon Dunn, Principal Planner
Lee County Division of Planning

Re: CPA2015-00001, Insufficiency Comments

Dear Brandon,

Please find attached a document, Corkscrew Farms Restoration Strategy, prepared by Kevin Irwin, that addresses the Environmental Comments contained in the February 13, 2015 Insufficiency Letter. Also attached are responses to the Natural Resources Comments that have already been shared with them.

Also attached please find a letter, dated August 6, 2014, from the Estero Fire Rescue that was omitted by mistake from the original submittal.

Sincerely,



Matthew A. Noble
ANoblePlan, LLC.

RECEIVED
FEB 16 2015
COMMUNITY DEVELOPMENT

Corkscrew Farms Restoration Strategy

Kevin L. Erwin CE PWS
Kevin L. Erwin Consulting Ecologist, Inc.

February 2015

Vision

To restore a key ecological feature within the DRGR by returning approximately 700 acres of Corkscrew Farms' over-drained agricultural lands back to productive, fully functioning and sustainable wetland habitats.

Introduction

The Farms occupies a strategic location in the DRGR immediately adjacent to the Airport Mitigation Park to the north and the Corkscrew Regional Mitigation Bank (CRMB) to the east. KLECE has designed and implemented the successful restoration of the CRMB (SFWMD) and Imperial Marsh Preserve (Lee County 20/20) projects east of and adjacent to the Farms site.

The Farms property slopes from a high elevation of 28.0' in the northeast corner to 19.0' in the southwest corner. This significant drop in elevation along with the existing network of drainage canals and ditches creates an adverse impact to the hydrology of the Farms as well as the public conservation lands to the east and north by over-draining those properties. All surface water currently flows into Flint Pen Strand to the west via the Corkscrew Road drainage ditches.

Ground and surface waters that historically pooled on this site during the wet season are now quickly drained directly into the Corkscrew Road drainage ditches that parallel the roadway along the southern boundary of the site. The subject property is developed for agricultural uses which includes an agricultural berm that extends along the north property line. The berm intercepts some wet season sheet flow from the Airport Mitigation Park and drains into the vicinity of the Burgundy Farms subdivision which lies west of and adjacent to the site.

Summary of benefits resulting from the restoration

- Restoration of nearly 700 acres of historic wetlands.
- Historic water levels and hydroperiods will be restored.

- Restoration will reestablish the historic groundwater profile.
- Restoration will improve hydrological conditions on thousands of acres of adjacent public lands to the north and east.
- Historic flow ways will be re-established across the site.
- Water quality will significantly improve onsite
- Improved water quality and groundwater levels will benefit the adjacent Lee County Utilities well field.
- Surface water discharge to the Flint Pen Strand will be limited to predevelopment flows.
- Opening the northern berm to southerly surface flow will improve the current high water elevations seasonally experienced in the Burgundy Farm Subdivision.
- Wildlife utilization and species diversity onsite will significantly increase.
- The incorporation of this form of restoration with residential development will set a new standard for future development in Lee County.

Designing the Corkscrew Farms Restoration Plan

Ecological History

Our work began with conducting an ecological history of the site and surrounding lands to determine the predevelopment ecological and hydrological conditions. We relied in part on the DRGR study we completed for Lee County in 2008. It was this study that identified the property as a Tier 1 Priority Restoration Site. 1953 aerial photographs (Figure 1 shows the subject property) from the Soil Conservation Service (now the National Resource Conservation Service), which were the clearest reliable representation of historic conditions, were scanned and plotted for mapping by KLECE to determine the approximate historic hydrological conditions for the entire study area.

The major habitat associations identified relate to specific hydroperiod and water depth conditions (hydropatterns), with each being color-coded to illustrate the historical hydropatterns in the DR/GR (Figure 2 shows the subject property).

We found that during a significant part of any year, with normal rainfall much of the DR/GR, including the Farms, had historically been flooded or had groundwater levels close to the surface. The deeper ponds, cypress swamps, and marshes have been assigned dark blue with progressively shallower, shorter hydroperiod (shorter duration

of inundation) wetlands being assigned lighter shades of blue (Figure 2). This representation illustrates the location of historic flow ways and headwater sheet flow areas and allows us to roughly calculate the historic capacity for water storage during an annual cycle.

Figure 1.

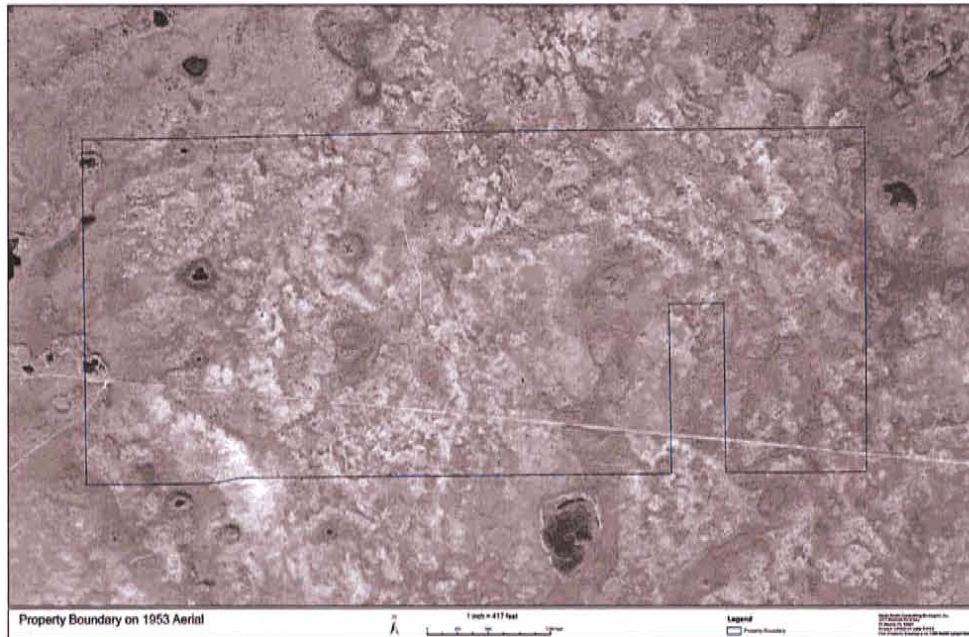
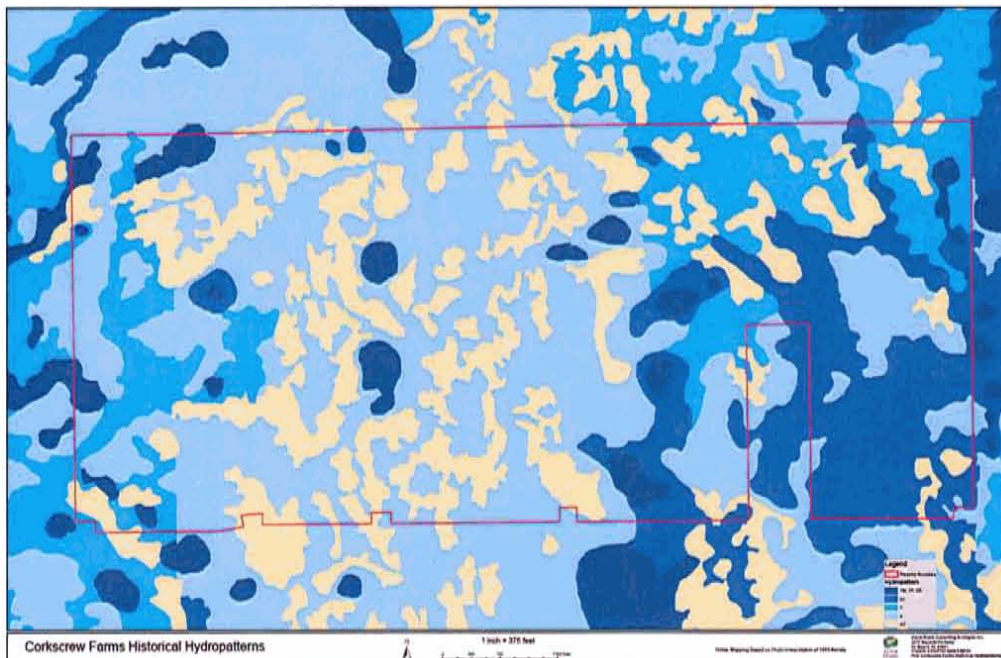


Figure 2.



Existing conditions

In June of 2014 we installed shallow groundwater monitoring wells and rain gauges across the site to collect existing conditions hydrological data. This data along with the inflow and out flow calculations provided by the project engineer (Barraco) will provide the information required to determine the approximate amount of water that remains available to “rehydrate” the drained farm fields. Similar data, if available, will be requested from the public mitigation lands located to the north and east of the Farms.

Available topographic data (Lee County LiDAR) will be field verified and used to estimate future wet season water levels and hydroperiods on the site given various restoration scenarios we select.

Planning

Each scenario will likely involve different combinations of ditches, ditch plugging and risers (water control structures) to “back-up” the water in cascading stages across the site from northeast to southwest. The scenario that best retains water onsite in manageable basins and mimics the historical hydropatterns will be used as the basis for the restoration plan. Surface water will once again be allowed to sheet flow into the site from the lands north and east of the Farms at selected locations where it is now blocked by berms and re-directed by ditches and canals.

The restoration targets (appropriate vegetation community types for the expected post-restoration hydrological conditions), will likely be very similar to those selected and now doing very well at the CRMB. The restored farm fields will contain a mixture of very shallow (0 to 3” depth) hydric pine forest, slightly deeper shallow cypress and marsh (3” to 12”. Unfilled, re-contoured ditch segments (within basins/no positive outfall) will become deep marsh and ponds which will provide wood storks and other waders with the late season (November-December) forage areas that are now rare in this area.

There are a few, drained cypress and hydric pine wetlands remaining on the site. These areas are heavily infested with problematic exotic plant species. They will first be cleaned of all exotics then rehydrated as part of the overall restoration plan.

In order to manage and convey surface water on the site we anticipate constructing several flow ways as part of the restoration plan. These flow ways will be located in the vicinity of the historical flow ways. Their design will resemble natural sloughs with wide floodplains. Flow way water levels will be maintained by water control structures, thus allowing water to be stored upstream of the structure and allowing storm flows to pass. A major water control structure will be located at the southwest corner of the site where all surface waters will eventually collect and discharge into the Corkscrew Road ditch and eventually into Flint Pen Strand to the west.

When completed the draft restoration plan will resemble something similar to the restoration plan we developed for the CRMB (Figure 3).

Figure 3.



Offsite Benefits

Historically, a high groundwater table and shallow surface water flowed slowly from the northeast to the southwest. When the Farms agricultural drainage system is replaced by restored wetlands and flow ways the elevated groundwater table will reduce the drainage and extend the hydroperiods of the wetlands within the adjacent Airport Mitigation Park and the CRMB. Seasonal high water levels in the Farms restored wetlands will be managed to match the preferred water levels on the adjacent public lands. The adjacent lands will not experience an increase or decrease in seasonal high water levels however, a restoration of normal hydroperiods is expected.

Prior to the restoration of the CRMB and the Imperial Marsh Preserve the uncontrolled drainage of the lands along the north side of Corkscrew Road quickly drained these

properties as well as the adjacent public lands (Airport Mitigation Park) to the north. As the CRMB hydrology was restored followed by the Imperial Marsh Preserve restoration the regional hydrology improved with less water being drained south into the Corkscrew Road ditch. The Farms wetland restoration will complete the last section of restoration of the agricultural drainage system, thus improving hydrological conditions to the north and east while also benefiting the Burgundy Farms subdivision to the west.

No adverse impacts to adjacent public lands or private properties will result from the planned residential development and wetland restoration only a net improvement in conditions.

Expected benefits to wildlife

The restoration of native upland pine forest, cypress and hydric pine wetlands and large expanses of pasture will result in significant benefits to wildlife. These restored habitats are large and will be connected to similarly restored public lands to the north and east thus reestablishing wildlife corridors for species such as Panthers and bears.

In normal rainfall years, restored hydric pine, cypress and marsh habitats with extended hydroperiods will provide foraging and nesting habitats for many wetland dependent species including woodstorks and other wading birds. Large numbers of woodstorks will forage in the restored wetlands and particularly the deeper pools created from the enhanced ditch segments and berm removal areas.

There will be no adverse impacts to upland or wetland forests as a result of the restoration or residential development. These forested areas, now infested with exotic and nuisance species of vegetation, will be enhanced through exotic control thus significantly improving potential habitat for species like the fox squirrel, indigo snake, bonneted bat.

Existing farm operations that minimize utilization by species like burrowing owls and Caracara will be discontinued and replaced with restored habitats more conducive to successful nesting and breeding.

Our experience on similar restoration projects, like CRMB and Little Pine Island, has shown significant increases in biological diversity from the baseline to the restored condition. Many resident and migratory species of birds, reptiles and mammals not currently utilizing the site will quickly be attracted to the restored conditions.

Implementing the restoration plan

The construction of the Farms wetland restoration will be supervised by the project ecologist, Kevin L. Erwin Consulting Ecologist, Inc. The firm has designed and managed the construction and maintenance of more than 100 restoration projects over the past 35 years, many within Lee County such as; CRMB, Imperial Marsh Preserve, Prairie Pines Preserve, Gateway; Six Mile Cypress Preserve North, Western Cape Coral/Matlacha Pass, Florida Gulf Coast University and the Little Pine Island Wetland Mitigation Bank. This experience is a key element of the successful implementation of the Farms restoration plan.

Phasing

The construction activity will be phased according to the activity and season. Initial activity will focus on removing exotic vegetation of all proposed restoration and enhancement areas (pastures and native habitats). Preparation of fields will be accomplished in phases, basin by basin, commencing at the upstream end of the system. Water levels will be restored in a basin only when all other restoration activities are finished in that basin.

Restoration Actions

Restoration in each basin will include a combination of the following activities. Detailed time-lines will be prepared prior to construction and used to manage all planned activities.

- 1. Exotic vegetation removal from natural areas.** All natural wetland and upland areas will be cleaned of exotics and nuisance species prior to any hydrological restoration. This enhancement activity typically involves foliar treatments of approved herbicides on herbaceous species and basal applications to trees such as Schinus and Melaleuca.
- 2. Prescribed burning.** Fire is an important tool for maintaining the upland habitats following exotic removal and may also be used to prepare the pasture areas for restoration.
- 3. Wildlife mitigation.** Wildlife permitting will likely require management protocols for the listed species onsite, such as burrowing owls, to provide protection and enhancement during the restoration activities. All residential development related panther and woodstork impacts will be offset through the purchase of mitigation bank credits.
- 4. Removing perimeter ditch berms to natural grade.** The berm along the north perimeter of the site will be opened to provide a reconnection of the flow ways offsite and through the restored sections of the Farms. Openings will be located to minimize

disturbance to mature trees such as pines and oaks that are now established on sections of the berm

5. Removing farm field ditch berms and backfilling ditch segments. Sections of ditches will be backfilled using the adjacent berms which will be removed to an elevation equal to or less than natural grade. This action eliminates any drainage function and will provide additional wading bird habitat and biological reservoirs for forage species.

6. Herbiciding and tilling farm fields for seed bank enhancement. This alternating process of herbiciding followed by tilling will control exotics and nuisance plant species while stimulating the natural recruitment of desirable native species from the seed bank.

7. Planting and direct seeding tree, shrub and herbaceous species. A combination of planting or direct seeding may be done within those areas of the restoration site where natural recruitment from the seedbank is lacking. Activities such as row cropping and sod production often impact the seedbank found in the shallow O and A-horizons of the soil.

Bare-root seedlings of trees and shrubs, such as slash pine and cypress, will be selectively planted to enhance the process of farm field restoration. Some herbaceous plantings may be used in these areas to enhance the areas where berms have been removed and ditches re-shaped as well as flow way construction.

The owner has also expressed a desire to use enhanced plantings (larger trees and shrubs) along the borders of the residential development footprint to improve the aesthetic appeal of the early stages of restoration. These plantings, if done, would be within a 50 ft. wide buffer zone of the restoration area, adjacent to all development (back of lots), and would be planted on 20 ft. centers with shrubs planted on alternating 20' centers.

8. Construction of flow ways and installation of water control structures. These ecological engineering design components will be constructed and installed as each phase as the restoration progresses in a basin by basin sequence. The water control structures utilized will vary from culvert risers to concrete weirs, very similar to the CRMB and Imperial Marsh restoration projects.

The culvert risers will allow the project ecologist to adaptively manage the water levels in each basin. Having this capacity to manage the water levels this way is important, especially during the first few years of a forested wetland restoration project. The concrete weirs will control water levels over larger areas of the site particularly within the flow ways which will be collecting surface water and like a natural slough, will provide direction to the surface water sheet flow onsite.

The constructed flow ways will vary in width from 50 to 150 ft. width with an excavated cross-section that resembles a natural slough complete with a deeper, meandering stream channel. The broad and shallow side-slopes planted with wetland species will be flooded as wet season water levels rise behind the water control structures. As the wet season ends, water levels will slowly recede back into the stream channel providing forage opportunities for wading birds like the wood stork.

9. Construction monitoring and adaptive management of the restoration. All of the restoration activities will be monitored by the project ecologist to provide guidance on the continuing restoration work and also information to agencies as required.

The following photos of similar restoration activities were taken at the CRMB.



Removing invasive exotic vegetation (2003)



Pasture before restoration (2004)



Disking former agricultural fields in early stages of restoration (2004)



Using prescribed fire as a management tool (2005)



Seeding hydric pine flatwoods pasture restoration area (2005)



Planting bare root pine tree seedlings in restored hydric pine habitat (2007)



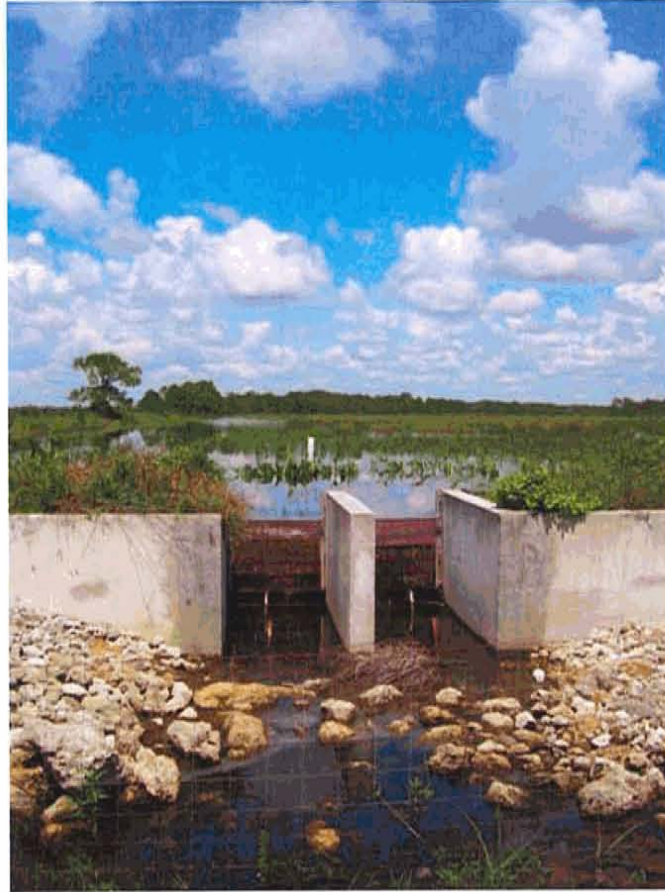
Hydric pine restoration area (2008)



Backfilling agricultural ditches (2008)



Backfilled and graded ditches to become hydric pine flatwoods (2008)



Main control structure, adjacent to the Farms, on Corkscrew Road (2009)



Releasing water to maintain appropriate water levels (2009)



Breaching existing berm to restore sheet flow (2008)



Restored sheet flow through breached berm (2008)



Created freshwater marsh (2008)



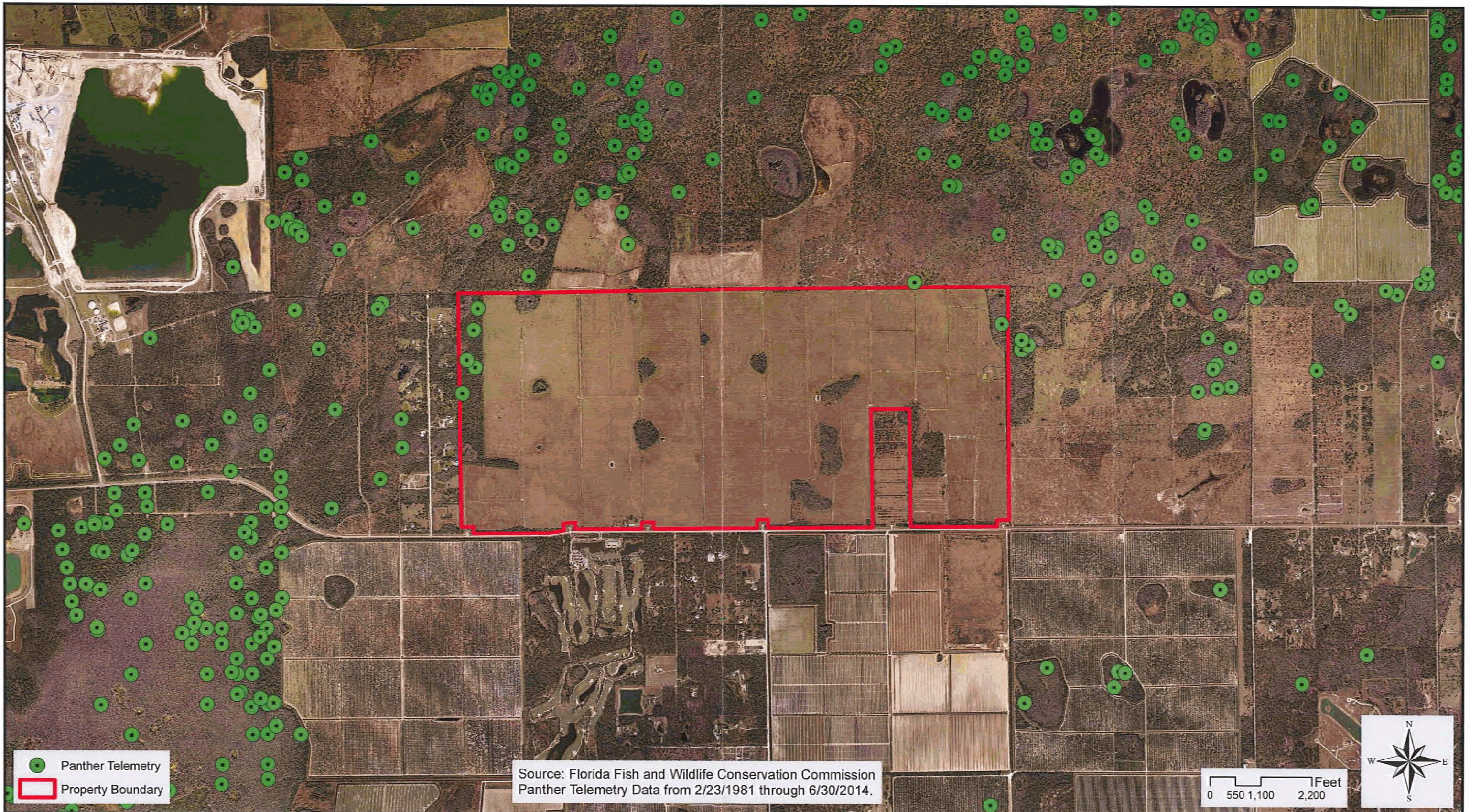
Monitoring restoration results (2009)



Mixed flock of wading birds (2009)

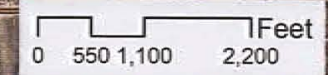
Long term management of the restoration areas.


The proposed design of the Farms wetland restoration focuses on outcomes, restoration targets that will be sustainable for many years with the appropriate management. The restoration areas will be identified as conservation areas as the project is approved and likely will be placed in conservation easements. The conservation easements will prevent the encroachment of future development as well as activities that are incompatible with the goal of sustaining the restored conservation areas in good ecological health. These areas will be physically managed following a long term management plan prepared by the project ecologist, implemented by the Home Owners Association with the assistance of an appropriately skilled environmental professional. Long term management activities required within the restored conservation areas will include annual surveys and control of exotic and problematic plant species, controlling water levels, maintenance of the water control structures and access.



- Panther Telemetry
- Property Boundary

Source: Florida Fish and Wildlife Conservation Commission Panther Telemetry Data from 2/23/1981 through 6/30/2014.



<h2>Panther Map</h2>		FILE NAME	Corkscrew farms panther map	PROJECT DESCRIPTION	PREPARED FOR	KEVIN ERWIN CONSULTING ECOLOGIST INC.	
		LOCATION	Corkscrew_Farm/mapsaves	CORKSCREW FARMS	CAMPROP INC.		
		DWG DATE	02-16-2015				
PROJECT / FILE NUMBER	SHEET NUMBER	BY	Kristoffer Bowman	LEE COUNTY, FLORIDA	4954 ROYAL GULF CIRCLE FORT MYERS, FL. 33966	2077 Bayside Parkway, Fort Myers, Florida 33901 Phone: +1 239-337-1505; Fax: +1 239-337-5983	KEVIN ERWIN <small>Consulting Ecologist, Inc.</small>
CPICF101		TECH	Vince Wang			www.environment.com	

Responses to Division of Natural Resources Insufficiency Comments:

1. The Storm water runoff must be directed to specifically designed and designated storm water treatment areas; it must not be directly diverted or placed into the proposed lakes.

Applicant Response: The project must provide 1/2" of treatment of all storm water runoff from all sodded areas located within the development footprint prior to discharge into the onsite lake storm water management system.

2. The applicant shall not discharge storm water from the development into the County's MS4 system unless specifically authorized by the Division of Natural Resources.

Applicant Response: With regard to discharge requiring authorization from the Lee County Division of Natural Resources please consider adding the following the following: "if the project can show a post development 10% reduction of nitrogen and phosphorous in the discharge of storm water into the Lee County MS4 system, which will be evidenced by a Nutrient Loading Analysis to be reviewed and approved by the South Florida Water Management District, no additional approvals will be required.

3. Will the applicant be proposing the use of the onsite lakes for boat traffic?

Applicant Response: There will be no motorized recreational boat traffic within the project;

4. Were there any investigations conducted to check the presence of chemical or other forms of contaminants onsite that may have potential for leaching into groundwater or surface water runoff?

Applicant Response: Correspondence from Universal Engineering regarding the Phase I and Phase II Environmental Site Assessment is attached.

5. There is a proposal of use of onsite Surficial aquifer wells as an irrigation source, will this entail a centralized irrigation system for everyone's use or numerous withdrawals for the lakes?

Applicant Response: The proposed use of Surficial Aquifer System (SAS) wells as an irrigation source will include a centralized control system for all irrigated areas, i.e., residential and common areas. The irrigation source will be from the five (5) SAS wells currently permitted by South Florida Water Management District (SFWMD) for agricultural use under Water Use Permit No. 36-0687-W. There are no other groundwater or surface water withdrawals proposed as irrigation sources and individual home owners will be prevented from adjusting or modifying the centralized control system irrigation schedule.

6. How will the applicant propose to meet or exceed requirements of the wellfield protection zones which this project falls within?

Based on Lee County's Wellfield Protection Ordinance, No. 07-35, Composite Iso-Travel Time Map showing protection zones, the Proposed Allowable Residential Land Use appears to be within Wellfield Protection Zones 3 and 4 (travel time one to five years and five to ten years, respectively) and borders Zones 1 and 2 with travel times of six months and one year. These wellfield protection zones regulate the following:

- *The use, handling, production or storage of regulated substances... in quantities greater than those set forth in section 14-208.*

The Proposed Allowable Residential Land Use is a residential community. Therefore, regulated substances will not be permitted to be used, handled or stored on-site in quantities greater than those set forth in section 14-208. As per section 14-208, there will not be an aggregate of any one, or all, regulated substances on a given parcel or in a certain building exceeding 110 gallons if the substance is a liquid, or 1,110 pounds if the substance is a solid.

- *Wastewater effluent disposal, except that public access reuse of reclaimed water and land application under the conditions set forth in F.A.C. 62-610, Part III, may be permitted. Where public access reuse is permitted the chloride content must be no greater than 500 milligrams per liter.*

The proposed allowable land use eliminates 130 individual septic systems near the existing Lee County Utilities (LCU) production wells. There will be no wastewater disposal on-site. Currently, public access to reuse water is not available.

- *Liquid waste disposal and solid waste disposal*

The proposed land use is a residential community. There will be no liquid or solid waste disposal.

- *Earth mining within a 500-foot radius of an existing wellhead.*

The proposed land use is a residential community and eliminates the possibility of a mine being constructed as was proposed by the current owner. There will be no mining onsite or within a 500-foot radius of any existing wellhead.

- *Stormwater or surface water discharged within this protection zone must conform to existing South Florida Water Management District and state department of environmental protection rules.*

The residential stormwater and surface water management system will be subjected to review and approval from the South Florida Water Management District (SFWMD) and the Florida Department of Environmental Protection (FDEP). All stormwater discharges will be in compliance with their existing rules.

- *Sanitary Hazard Zone. Sanitary hazards are prohibited within a 100-foot radius around an existing or proposed public water supply well.*

There will be no on-site septic systems and no sanitary hazards within a 100-foot radius of existing and proposed public water supply wells.

- *Abandoned wells on property lying within the ten-year travel time zone of wells regulated by this article will be physically plugged in accordance with the provisions of Lee County Ordinance No. 06-09, Section 9.3.4.*

Any wells to be abandoned on-site will be properly plugged and abandoned as per Lee County Ordinance No. 06-09, Section 9.3.4, as well as adhering to proper plugging and abandonment requirements of SFWMD Rule 40E-3.531(3) F.A.C.

The proposed residential land use will meet and exceed the requirement of the Lee County Wellfield Protection Ordinance.

7. *Will the applicant be proposing dewatering onsite?*

Applicant Response: Dewatering is anticipated for installation of utilities and construction of lakes. All dewatering will remain “onsite” (no discharge off site). The dewatering plan shall also include a recharge trench to be placed between any dewatering operation and Lee County well heads along Corkscrew Road prior to entering an onsite impoundment.

8. *A lake management plan shall be submitted for review and approval by the Division of Natural Resources. Among other issues, the plan shall address the following issues:*

*Best management practices for fertilizers and pesticides,
Erosion control and bank stabilization including any proposed boat slips,
Lake maintenance requirements,
Water Quality Monitoring Plan which will document the specifics of the surface water and groundwater monitoring networks,
Wellfield protection.*

Applicant Response: It is agreed a Lake Management Plan which addresses 1) Best Management Practices for fertilizers and pesticides, 2) Erosion control and bank stabilization, 3) Lake maintenance requirements, 4) Water Quality Monitoring Plan which will document specifics of the surface water and ground water monitoring networks, 5) Wellfield protection, will be submitted as part of the Development Order application.



PHASE I ENVIRONMENTAL SITE ASSESSMENT

**Proposed Corkscrew Farms
1,350 Acre Property
Corkscrew Road
Estero, Lee County, Florida**

Universal Project No. 0540.1400126.0000
October 7, 2014

Prepared on behalf of:

Camprop, LLC
4954 Royal Gulf Circle
Fort Myers, FL 33966

Attention: Mr. Anthony Cameratta

Prepared by:
Universal Engineering Sciences, Inc.
5971 Country Lakes Drive
Fort Myers, Florida 33901
www.UniversalEngineering.com
COA BG33

Prepared by:
Matthew Hoffman, E.I.
Staff Engineer

Reviewed by:
Michael Geden, P.G.
Senior Geologist

Signature

Signature

Consultants in: Geotechnical Engineering • Environmental Sciences • Construction Materials Testing • Threshold Inspection
Offices in: Atlanta, GA • Daytona Beach, FL • Fort Myers, FL • Fort Pierce, FL • Gainesville, FL • Jacksonville, FL • Leesburg, FL • Miami, FL • Ocala, FL • Orange
City, FL • Orlando, FL • Palm Coast, FL • Panama City, FL • Pensacola, FL • Rockledge, FL • Sarasota, FL • St. Augustine, FL • Tampa, FL • West Palm Beach, FL



UNIVERSAL ENGINEERING SCIENCES

Consultants in: Geotechnical Engineering • Environmental Engineering
Construction Materials Testing • Threshold Inspection • Private Provider Inspection

October 7, 2014

Camprop, LLC
4954 Royal Gulf Circle
Fort Myers, FL 33966

Attention: Mr. Anthony Cameratta

Reference: **Phase I Environmental Site Assessment**
Proposed Corkscrew Farms
1,350 Acre Property
Corkscrew Road
Estero, Lee County, Florida
Universal Project No. 0540.1400126.0000

Dear Mr. Cameratta:

Universal Engineering Sciences, Inc. (Universal) has completed the Phase I Environmental Site Assessment (ESA) following the American Society for Testing and Materials (ASTM) format E1527-13 for the above-referenced property. The purpose of this evaluation was to identify recognized environmental conditions as described in ASTM E1527-13, which is consistent and compliant with the United States Environmental Protection Agency's (EPA) final *All Appropriate Inquiries* rule (effective November 1, 2006).

Based on the results of the Phase I ESA conducted at the Property, evidence of unresolved recognized environmental conditions was not identified based on Universal's review of regulatory and historical resources and our site reconnaissance with the exception of the following:

An area of waste oil impacted soil was removed from a currently unknown area of the Property in 2002. Arsenic was reported in a confirmatory soil sample obtained during these previous remedial activities at a concentration of 2.7 milligram per kilogram (mg/kg) which exceeds the Direct Exposure Residential Soil Cleanup Target Level (SCTL) of 2.1 mg/kg. No further assessment was performed in this area of the Property. Based on this reported SCTL exceedance and the planned future use of the Property, UES recommends further assessment of this area of the Property to confirm and possibly delineate area of arsenic impacts.

Further, UES has identified the following Business Environmental Risk (BER):

Row crops and sod farming operations have been located at various portions of the Property since the early 1970s. These activities mainly occurred between the 1970s and 1990s. However, portions of the site were used for crops at the time of our site reconnaissance. These onsite agricultural operations likely included the use of pesticides, herbicides and fertilizers which may contain hazardous chemicals. Other chemicals (such as arsenic and copper) may also have been used. The proper storage, handling and application of approved chemicals does not constitute a recognized environmental condition at the subject property. Improper or long term application of compounds

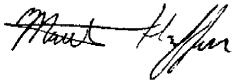
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containing arsenic and copper has been shown, at times, to leave these metals in the soil at elevated concentrations. In the event that the land usage changes from agricultural to commercial or residential, the elevated metals concentrations may exceed the recommended exposure levels established by the Florida Department of Environmental Protection (FDEP). While the FDEP does not require the cleanup of agriculturally applied compounds, the presence of these compounds in excess of the exposure concentrations may present future liability should the property be redeveloped. While not a REC, if the land usage is to change, UES recommends soil sampling to determine if these compounds are present in concentrations which exceed health based criteria.

The User of this report is required to ensure that continual obligations regarding the subject property are met following the issuance of this Phase I ESA. The User should ensure that all contractors, visitors, etc. to the subject property are following best management practices in preventing any possible release, discharge, etc. of petroleum products, hazardous materials or waste, or any substance likely to result in a recognized environmental condition. In the event of a future discharge or release on the subject property, the current subject property owner or responsible party is required to report the discharge/release to all applicable regulatory agencies.

Universal appreciates this opportunity to provide environmental services to you and looks forward to future endeavors. Please contact the undersigned if you have any questions regarding this report.

Respectfully submitted,
Universal Engineering Sciences, Inc.



Matthew Hoffman, E.I.
Staff Engineer



Michael Geden, P.G.
Senior Geologist

1 cc: Addressee (email: tcameratta@camerattacompanies.com)

1 cc: Ray Blacksmith – (email only: rblacksmith@camerattacompanies.com)



UNIVERSAL ENGINEERING SCIENCES

PHASE II ESA
CORKSCREW FARMS PROPERTY
CORKSCREW ROAD
ESTERO, LEE COUNTY FLORIDA

UES Project No. 0540.1400126.0000

November 3, 2014

Prepared For:

Camprop, LLC
4954 Royal Gulf Circle
Fort Myers, FL 33966

Prepared By:

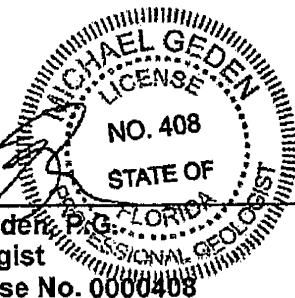
Universal Engineering Sciences, Inc.
5971 Country Lakes Drive
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Reviewed By:

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Florida License No. 0000408



Consultants In: Geotechnical Engineering • Environmental Sciences • Construction Materials Testing • Threshold Inspection
Offices In: Atlanta • Daytona Beach • DeBary • Fort Myers • Fort Pierce • Gainesville • Jacksonville • Leesburg • Miami • Ocala
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Consultants In: Geotechnical Engineering • Environmental Sciences
• Construction Materials Testing • Private Provider & Threshold Inspections

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Jacksonville	Leesburg
Miami	Ocala
Orlando	Palm Coast
Panama City	Pensacola
Rockledge	Sarasota
St. Augustine	Tampa
West Palm Beach	Clermont

November 3, 2014

Camprop, LLC
4954 Royal Gulf Circle
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Attention: Mr. Anthony Cameratta

Reference: Phase II ESA
Corkscrew Farms Property
Corkscrew Road
Estero, Lee County, Florida
UES Project No. 0540.1400126.0000

Dear Mr. Cameratta:

Universal Engineering Sciences, Inc. (UES) has completed soil sampling activities following the Florida Department of Environmental Protection's (FDEP) Standard Operating Procedures (SOPs) for the above referenced site located in Estero, Lee County, Florida. The purpose of this evaluation was to evaluate the business environmental risk (BER) identified in our Phase I ESA, dated October 7, 2014, (UES Project No. 0540.1400126.0000).

Based on the BER identified during the Phase I ESA, the collection and laboratory analyses of soil samples at the subject property were performed as part of this evaluation. Based on results of our soil sampling activities we conclude the following:

Arsenic was reported in one (1) of the fifty (50) soil samples (sample B-48, obtained in the eastern portion of the Property) collected at the Property at a concentration which exceeds the DER-SCTL of 2.1 mg/kg for arsenic. However, we understand this area of the Property is not planned for future development. Further, based on the remaining lab results which reported no arsenic results above 1 mg/kg, no further evaluation at the subject property is warranted at this time. If the area of the Property in the vicinity of B-48 is redeveloped in the future, further confirmatory soil sampling may be necessary at that time.

Based upon the results of our soil sampling activities, no further investigation at the subject property is warranted at this time.

We appreciate the opportunity to be of service as your environmental consultant on this project and look forward to a continued association. If you have any questions concerning this report or if we may be of any further service, please contact us at mhoffman@universalengineering.com or 239-995-1997.

Respectfully submitted,
Universal Engineering Sciences, Inc.

Matthew A. Hoffman, E.I.
Staff Engineer

MAH/mah

3 cc: Client (email tcameratta@camerattacompanies.com)
1 cc: Ray Blacksmith – Camprop, LLC (email only: rblacksmith@camerattacompanies.com)



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- West Palm Beach

November 17, 2014

Mr. Ray Blacksmith
Camprop, LLC
4954 Royal Gulf Circle
Fort Myers, FL 33966

Reference: **CONFIRMATORY SOIL SAMPLING**
Corkscrew Farms Property
Estero, Lee County, Florida
UES Project No.: 0540.1400126.0000

Dear Mr. Blacksmith:

Universal Engineering Sciences, Inc. (UES) is pleased to present the results of our confirmatory soil sampling at the above referenced site ("subject property"). Based on the results of our recent Phase II Environmental Site Assessment (ESA) performed at the subject property, arsenic was reported in one soil sample, sample B-48, at a concentration of 11 milligrams per kilogram (mg/kg) which exceeds the Direct Exposure Residential - Soil Cleanup Target Level (DER-SCTL) of 2.1 mg/kg for arsenic.

On November 10, 2014 UES obtained five (5), confirmatory surficial (0 to 6 inches below land surface) soil samples at the location of B-48 (CS-1) and five feet around the previous sample (CS-2 to CS-5). The soil samples obtained were analyzed for Arsenic using EPA Method 6010.

The soil sampling activities were conducted in accordance with the Florida Department of Environmental Protection's Standard Operating Procedures as required for General Sampling Procedures (FS 1000), Soil Sampling (FS 3000) and according to the Cleaning/Decontamination Procedures (FC 1000).

Arsenic was not detected above laboratory detection limits in the five confirmatory soil samples (CS-1 to CS-5) collected at the subject property. A summary of the soil analytical data is attached in **Tables 1 and 2**. Copies of the Chain-of-Custody Documentation and Laboratory Reports are also attached.

Based on the results of the confirmatory soil sampling no further assessment is warranted at this time.

The findings of this report represent our professional judgment; UES offers or extends no warranty, express or implied. These findings are relevant to the dates of our site work and the information cited herein. This report should not be relied upon to represent site conditions on other dates or at locations other than those specifically cited within the report. Universal Engineering Sciences, Inc. can accept no responsibility for interpretations of these data made by other parties.

Should you have any questions concerning these supplemental foundation recommendations, please contact us at your convenience.

Respectfully Submitted,
UNIVERSAL ENGINEERING SCIENCES

Matthew A. Hoffman, E.I.
Staff Engineer

1 cc- addressee (email: rblacksmith@camerattacompanies.com)

Attachments: Tables

Laboratory Results and Chain of Custody Report

5971 Country Lakes Drive, Fort Myers, Florida 33905 (239) 995-1997 Fax (239) 313-2347

www.UniversalEngineering.com



Estero Fire Rescue

21500 Three Oaks Parkway
Estero, Florida 33928
(239) 390.8000
(239) 390.8020 (Fax)
www.esterofire.org

August 6, 2014

Mr. Joseph Cameratta

Mr. Cameratta,

Please accept this letter as confirmation that adequate space is available at Estero Fire Rescue Fire Station # 44 for an EMS Ambulance. This fire station is located at 21300 Firehouse Lane Estero Florida.

Should you require any additional information please feel free to contact me at 239-390-8000.

Respectfully,

Phillip Green
Division Chief of Prevention
Estero Fire Rescue

"DEDICATED AND DRIVEN FOR THOSE WE SERVE"
