

May 22, 2017

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Paula McMichael
Hole Montes, Inc.
950 Encore Way
Naples, FL 34110

Re: Cemex Alico Quarry Extension
CPA2017-00002
Map Amendment Application

Ms. McMichael:

Planning staff finds the above mentioned submittal is insufficient and further information is needed. The following comments pertain to the section of the application indicated. A public hearing date will not be scheduled until a complete application is submitted. If you do not provide the requested supplements or corrections within 90 calendar days of this letter, this application will be considered withdrawn.

II A. Requested Change.

The application form indicates, on Page 2 of 9, that the proposed amendment is a Text and Map Amendment, however staff did not note any proposed text or table amendments within the application materials. Please clarify and revise the form if necessary.

IV A. 4. General Information and Maps, Map and describe existing land uses

The adjacent land use table should identify preservation/conservation as adjacent uses. Active agriculture and mining does not fully describe the adjacent land uses.

How is the proposal consistent with adjacent public conservation lands land use category?

IV A. 6. General Information and Maps, The legal description(s) for the property

Staff is unclear if the description provided is for the entire property, or the portions of the property that are proposed to be added to Map 14. Please clarify and provide legal descriptions for both the property and the lands that are proposed to be added to Map 14.

There are exhibits within the application materials that identify different "Expansion Areas." Please clarify the area that is to be added to Map 14.

IV C. Environmental Impacts. Provide an overall analysis of the character of the subject property and surrounding properties, and assess the site's suitability for the proposed use upon the following.

Please provide FLUCCS and soils map on an overall sheet at 24" x 36" scale. The current drawings are 8.5" x 11" sheets of paper and do not provide an overall map of FLUCCS or soils.

Please provide a topo map.

IV C. 6. Environmental Impacts, A table of plant communities by FLUCCS

The application indicates that existing wetlands that are adjacent to the conservation lands and utilized by wildlife will be impacted. Please clarify the effect that removing these will have on the wildlife and health of adjacent preserves.

Misc - Environmental Comments

1. Please provide a date for when the panther telemetry information was obtained from FWC.
2. What effects will the operation of a mine in this location have on wildlife and the adjacent Conservation Lands?
3. How can we be assured that the placement of a mine will not negatively affect the adjacent conservation lands? Staff is primarily concerned about altering the wetlands and impacts to Florida panthers.
4. How will the conservation lands be protected from impacts from the mining operation such as; lighting, dust, blasting, traffic, or other operations of the mine? Will prescribed burns on the conservation lands be an issue for mine operations?
5. The existing indigenous preserves are connected to the adjacent conservation lands. The proposal to add this mine to Map 14 includes wetlands which appear to be connected to offsite conservation lands. Will more or less water be placed on the adjacent conservation lands?

Misc - Natural Resources Comments

1. The current Map 14 depicting "Future Limerock Mining" overlay was based on extensive and comprehensive studies such as "Prospects for Southwest Lee County (Dover Kohl, 2008) and "Comprehensive Hydrological Study of the Lee County Southeastern Density Reduction / Groundwater Resources (DRGR) Area (DHI, 2009). In those studies multiple future land use planning scenarios were evaluated in great detail focusing on major water resources within the DRGR: improving or preserving natural flowways, historical groundwater levels, and wetland depths and hydro-periods, etc. Therefore, modification of Map 14 warrants similar degree of detailed evaluation as those above-mentioned studies. This application lacks those details for technical review.
2. Please describe how the applicant plans to restore and protect surface and groundwater resources. Please include three different layouts to demonstrate historic, existing, and future (proposed) surface water drainage patterns. Provide a discussion on minimizing/avoiding development impact and/or restoring/improving following areas: recharge/infiltration, groundwater levels, water storage, historical/natural flow-ways, hydroperiod, wildlife habitat, and water quality.
3. Comments on the "Hydrologic Report, Alico Quarry ..." by The Colinas Group (March 1, 2017)
 - a. On page 2, the NAVD 88 datum values converted from NGVD appear incorrect for the Lee County DRGR area.
 - b. The Lee Plan Policy 33.2.7 specifies that the potential mine impacts on surface and groundwater resources "will be analyzed using integrated surface and groundwater models." The submitted model (MODFLOW) is for groundwater only, not an integrated model. The applicant is advised to contact Lee County Division of Natural Resources for the existing DRGR Mike She model.
 - c. Provide electronic files for all models including auxiliary input data.

- d. The "existing condition model" should properly represent the existing hydrologic field conditions by including the existing mine lakes, ditches and berms, irrigation pumping, etc. Then, the proposed condition model with the new mine lake plan should be compared against the calibrated existing model in terms of water level, drawdown, recharge, etc. In addition, the same comparison needs to be presented for dry season impacts (of mine lakes).
- e. Provide a Water Budget Analysis comparison of pre- and post- development by considering all the hydrologic processes such as rainfall, evaporation/evapotranspiration, surface water entering and leaving, groundwater, irrigation (and freeze protection) pumping, recharge, etc.
- f. The proposed mine expansion appears to alter/block the existing sheet flow across the northern boundary. Therefore, the following concerns must be addressed:
 - i. Flooding at the adjacent properties including the existing dirt road,
 - ii. Cutoff of surface water flow,
 - iii. Depletion of onsite stormwater storage capacity,
 - iv. Alteration of hydroperiod and water levels at the existing wetlands.
4. Please provide all data that was utilized in preparing the application package. This must include but not limited to all water levels and quality monitoring data in excel format.
5. Please review the requirements for a Wellfield protection permit, and list all activities that will take place in and around the wellfield protection zones.
6. Is the development proposing zero offsite discharge during mining operation, which could last for nearly six years?
7. Please provide proposed depth and volume of material applicant is proposing to excavate from project.
8. Is the applicant proposing cell mining and leaving the cell separations in place?
9. Goal 10, Policy 10.1.3, Objective 10.2: The text provided in the application refers to previous an environmental analysis and hydrogeologic report but not the monitoring and management activities for the future. Please provide a description of the proposed management activities and monitoring plans.

If I can be of any assistance, or if you have any questions, please do not hesitate to call me at (239) 533-8585.

Sincerely,
Department of Community Development
Planning Section


Brandon D Dunn, Principal Planner

Cc: Planning file: CPA2017-00002