



Lee County

Southwest Florida

Board of County Commissioners

Kevin Ruane
District One

April 7, 2023

Cecil L Pendergrass
District Two

Daniel DeLisi, AICP

Ray Sandelli
District Three

Delisi, Inc

Via E-mail Only: dan@delisi-inc.com

Brian Hamman
District Four

RE: CPA2022-00014 and CPA2022-00015

Mike Greenwell
District Five

The Preserve Sporting Club and Residence Map and Text Amendments

Roger Desjarlais
County Manager

Dear Mr. Delisi:

Richard Wm. Wesch
County Attorney

Staff has reviewed the materials submitted for Lee Plan map and text amendments, CPA2022-00014 and CPA2022-00015, received on March 2, 2023. Staff finds that the application materials are insufficient and further information is needed.

Donna Marie Collins
County Hearing
Examiner

GENERAL COMMENTS

1. Staff had difficulty reviewing the proposed text amendments. It may have been inadvertent, but the Exhibit T-4 does not reflect existing Lee Plan language. Please provide a strike through/underline version of Exhibit T-4 showing all language that is proposed to be added and deleted in strikethrough and underlined formatting.
2. Please amend the analysis of Lee Plan policy 123.3.1. It references policy 107.3.1 which was renumbered to 123.3.1.
3. Please provide an analysis of Lee Plan policies 61.1.6, 123.2.10, 126.1, 126.1.1, and 126.1.4.
4. Please expand on the analysis of Lee Plan Policies 13.2.10, 13.2.11, and 123.2.10 and Objective 123.4. Part of the proposed recreational club's attraction is the firearm and hunting activities offered. How will the increase in frequency and intensity of firearm and hunting activities affect the surrounding area? Particularly the conservation lands to the south and the residential properties to the north as well as endangered and threatened species that have been identified nearby.

ENVIRONMENTAL COMMENTS

5. General Environmental Comment: In December 2016, the Florida Forever Plan added property which included section 27 and 34 of this project. These sections are still part of the most recent Florida Forever Plan publication dated May 26, 2022. Please provide an analysis demonstrating how the inclusion of the property on the Private Recreation Facilities Overlay, Map 1-F, is consistent with Lee Plan policy 13.1.1(1).
6. Water Resources Comments as required by Policies 1.4.5, 13.4.6.2, and 33.1.7.
 - a. Please include any reports associated with the existing integrated surface/ground water (SLC) model by Lago Consulting & Services, LLC & CHNEP in the appendix. Please provide the source for all model input parameters such as topography, Manning's M values, rainfall, evapotranspiration (ET), etc. if the information is not provided in a report for the SLC model.

- b. Please further explain the reasoning for choosing a 150 ft x 150 ft grid, and why a smaller grid size was not used for this project.
 - c. Please analyze and compare existing and proposed conditions for the 25 year 3 day and 100 year 3 day SFWMD design storms, to demonstrate no offsite adverse surface water impacts.
 - d. Page 25 of the Water Resource Report states that wet season water levels west of the large wetland are not increased during the wet season, but Figures 15, 16, and 17 indicate a rise in surface water elevations in several locations, including near Carter Road. Please explain how this is not an adverse impact and analyze for the 25 year 3 day and 100 year 3 day SFWMD design storms.
 - e. Please discuss any surface water level impacts to the residential area west of the project, adjacent to and including Carter Road in the conclusion section.
 - f. Please provide more details and visual aids regarding the future drainage conveyance area discussed on page 12 of the Water Resources Report. The future drainage conveyance is not depicted on the MCP. The Sufficiency Response states that the project will be designed to accommodate proposed drainage capacity as identified in the Southern Lee County Flood Mitigation Plan but additional details were not provided.
 - g. Please further explain how surface water pumping was simulated in the existing condition model, as mentioned on page 20 of the Water Resources Report. Please provide more details on the pumps such as pump horsepower, flow rate, and operation parameters.
 - h. Please indicate if existing berms will be removed within the preserve areas? If so, please provide more detail in the Water Resources Report and Concept Plans, such as typical sections and plan view location callouts.
 - i. Regarding the existing berm along the North property line near Structure 6, please show the extents that were reviewed and please provide dates. Was the berm surveyed? Do surface water elevations exceed the berm TOB for a 25 year 3 day design storm anywhere?
 - j. Please explain what happens to Structure 2 in Figure 10 "Existing Conditions Structures". Structure 2 is not shown to remain in Figure 12 "MIKE 11 Network, Structures, and Surface Water Bodies for Proposed Pepper Place". How will the offsite flows from the existing ditch system be continued or improved, thru or around the site?
 - k. Please further explain on page 17, the modifications to structure 16 on the Titan Mine property. What changes were made, and how was the new information obtained? Was the structure surveyed?
 - l. As discussed on page 22 of the Water Resources Report, please further explain how the proposed surface DEM was created and merged with the existing surface DEM for the proposed conditions model. Please provide figures of each surface (at original and 150'x150' grid size) in the report.
 - m. Please explain how the Mike 11 cross sections were obtained.
 - n. Please explain how Structures 1 and 2, shown in figure 12 and described on page 22, were sized? How were the invert elevations decided?
 - o. Please provide a letter from Panther Island Mitigation Bank stating that additional flow and longer hydroperiods are acceptable. Include this letter in the report appendix.
 - p. Please provide the historical wetland elevations? Please detail how were those elevations determined? How do the historical elevations compare to existing and proposed elevations in the continuous model run? Please provide graphs for each onsite and adjacent wetland showing the historic, existing, and proposed elevations.
7. Comments about the MIKE SHE model as required by Policy 1.4.5 and 33.1.7:
- a. Please simulate the 25 year 3 day and 100 year 3 day SFWMD design storms, to demonstrate no offsite adverse surface water impacts.

- b. Please explain why only one culvert was modeled under Corkscrew Road on the CorkCrossE branch near the NE property corner? County records indicate there are three (3) pipes in this location.
8. Comments addressing impacts to groundwater as required by Policies 1.4.5, 13.8.9, and 33.1.7
- a. Staff was not able to identify a dry season monitoring discussion in the provided Water Resources Report. Please update the Water Resources Report to include dry season monitoring specifications.
 - b. Please identify all surface water and groundwater monitoring locations on a site plan or aerial.
 - c. Please provide further discussion and quantify the groundwater recharge discussed on page 15 of the Water Resources Report. Where is the recharge occurring?
 - d. While the overall irrigation demand is being reduced, the demand per acre is increasing. How many irrigation wells are proposed in the new development? Please identify the location, and aquifer constructed to, for all proposed new wells.
 - e. Please identify any existing wells that will be used or abandoned, along with their aquifer source.
 - f. Please demonstrate that the new use will not impact adjacent property owner's existing wells.
 - g. The project's irrigation systems must be computerized per Lee Plan policy 13.8.9. Please update the statement on page 14 of the Water Resources Report (below table 1) that states "the proposed project will also explore the use of computerized irrigation systems....".

PUBLIC FACILITIES COMMENTS

9. Please confirm whether the 7,500 square foot restaurant, within the clubhouse is open to the general public or not.
10. Please amend Appendix D (D1RPM Inputs and Outputs) of the TIS to align with the proposed land use intensity outlined in March 2023 resubmittal. The current model input data does not correspond to the proposed land use intensity. Please correct. Furthermore, please update the following items in the report: Appendix D, Figure 2, Table 2, Table 5, Table 6, Table 7, and Table 8

LEGAL REVIEW

11. Please update the legal description and sketch so that they are tied to the state plane coordinate system for the Florida West Zone (North America Datum of 1983/1990 Adjustment) with two coordinates, one coordinate being the point of beginning and the other an opposing corner.

If you do not provide the requested supplements of corrections within 90 days of this letter, the applications will be considered withdrawn. Please note that staff may have additional questions based on any new information that is submitted. These cases will be reviewed concurrently. Once both cases are found to be sufficient they will be reviewed by staff and scheduled for hearing together. Please feel free to contact me at (239) 533-8585 if you have any questions.

Sincerely,

Lee County Department of Community Development



Brandon Dunn, Principal Planner, Planning Section

CC: Case File