



Board of County Commissioners

Kevin Ruane
District One

June 13, 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

The Preserve Sporting Club and Residence Map and Text Amendments

Mike Greenwell
District Five

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 May 12, 2023. Staff finds that the application materials are insufficient and further information is needed.

Donna Marie Collins
County Hearing Examiner

ENVIRONMENTAL COMMENTS

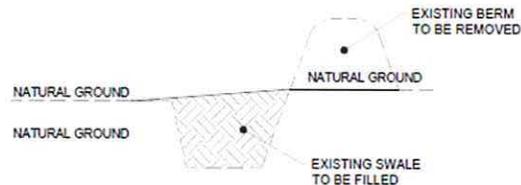
Water Resources Comments and MIKE SHE Model Comments:

1. Please amend the existing conditions model to include the Verdana Village development for an accurate pre and post comparison. Only the proposed condition model included the Verdana Village development and the model provided indicated a rise in surface water elevations in several locations, including near Carter Road. Please provide an updated integrated surface and groundwater model for Staff’s review.
2. The integrated surface and groundwater model provided by the applicant indicated higher peak flood depths in the vicinity of two houses in the southeastern portion of the rural residential area. The applicant’s response letter estimated that the peak stage would be below the estimated edge of the building lot footprint. If the revised integrated surface and groundwater model still predicts a rise on offsite properties please evaluate surveyed elevations of all habitable structure floors, accessory floors, electrical equipment, and top of well casings within the affected 100 year floodplain. Without this additional information Staff cannot find that the project has no adverse impacts on surrounding properties.
3. As previously requested, please provide the SLC model report by Lago Consulting & Services, LLC & CHNEP in the appendix section of the Water Resources Report.
4. Please provide the results of the 25 year 3 day storm simulation, similar to Figure 33 (100 year design storm event).
5. Please explain how the flow and operation parameters shown in the image below were decided. These two surface water pumps do not match the flow capacity or operation parameters described in the response to insufficiency comment 6(g) within the Sufficiency Response Letter dated 5/11/2023.

Overview

	Branch	Chainage	ID	Outlet Level	Spec. Type	Discharge	Start Level	Stop Level	t-Start	t-Stop
1	6LFarm_P26	918.635171	Pump26		Fixed Discharge	41	23.6	23.1	0	0
2	6LFarm_P27	1443.56955	Pump27		Fixed Discharge	39	24.2	23.7	0	0

6. Staff previously asked if existing berms would be removed within the preserve areas. In the Sufficiency Response Letter, dated 5/11/2023, the applicant stated that no information was available regarding berms with the preserve areas. During review of the resubmittal, Staff noted that the plans submitted to SFWMD on 3/31/2023 provide an existing ditch and berm backfill/regrade detail, as shown below. As previously requested, please provide details including but not limited to typical sections and plan view location callouts in the Water Resources Report and Concept Plans.



NOTE:

- AREA BETWEEN THE RESTORATION AND NATURAL WETLAND WHERE THE BERM WILL BE REMOVED AND THE DITCHES BACKFILLED WILL BE PLANTED WITH NATIVE PLANTINGS APPROPRIATE FOR THE PROPOSED HABITAT TYPE.
- ADDITIONAL GRADING DETAIL TO BE PROVIDED WITH DEVELOPMENT ORDERS AS PART OF RESTORATION OF THE SITE.

**EXISTING DITCH AND BERM
BACKFILL/REGRADE DETAIL**

NTS

7. Please provide a topographic survey of the existing berm along the North property line near Structure 6 to verify the assumed elevations modeled. This additional information is needed to support the assumptions made by the applicant.
8. The response to comment 6(j), in Sufficiency Response Letter dated 5/11/2023, stated that a berm was identified during a field visit, and it was assumed water can flow over a low portion of the berm. Please provide a topographic survey of the existing berm identified in the field. This additional information is needed to support the assumptions made by the applicant.
9. Please detail how offsite flows from the existing ditch system CorkscrewTrib1 will be maintained or improved. Please provide pre and post surface water stage hydrographs for the CorkscrewTrib1 river network in the Water Resources Report.
10. Previously Staff asked for additional information regarding the modifications to Structure 16 on the Titan Mine property that were modeled. In the Sufficiency Response Letter, dated 5/11/2023, the applicant stated that photographs, field measurements, and elevations were estimated based on old permit drawings and LIDAR. The modified weir crest elevation and dimensions used by the applicant vary greatly from what was modeled in the Southern Lee County Flood Mitigation Plan MIKE model. Please provide detailed supporting documents and measurements to justify the applicant's modifications to Structure 16.
11. Appendix B of the Water Resources Report described the topographic analysis resulting from a transect survey through the wetlands. The analysis only provided the differences between the regional LIDAR data and the surveyed ground elevations. Please provide the elevations recorded during the transect surveys and provide figures of before and after modifying the DEM (with wetland limit overlay). Please provide the datum used and specify what equipment was used to obtain the elevations. If GPS was used to obtain elevations, what was the vertical accuracy of each point before the shot was stored?
12. As previously requested, please explain how Structures 1 and 2, shown in figure 12 and described on page 22, were sized? How were the invert elevations decided?
13. Advisory comment: Please note that Structures 1 and 2 appear to be modeled incorrectly as box culverts, according to the 3/31/2023 ERP plans. Additionally, Structure 1 is not proposed in the ERP plans and Structure 2 is proposed east of the wetland. The structures in the ERP and DO plans must be hydraulically equivalent to the structures in the MIKE model.

14. As previously requested, please provide a letter from Panther Island Mitigation Bank stating that additional flow and longer hydroperiods are acceptable. Please include this letter in the Water Resources Report appendix.
15. Please provide pre and post condition stage hydrographs for each onsite and adjacent wetland for the continuous model time period. Please provide scientific reasoning as to what the historical wet season water table elevations were prior to farm operation and show the elevation on each hydrograph for the onsite and adjacent wetlands.

Groundwater Comments:

16. As previously requested, please identify the number of irrigation wells proposed in the new development. Please identify the location and aquifer constructed to for all proposed new wells.
17. Please demonstrate that the proposed use will not impact adjacent property owner's existing wells. While the development is proposing groundwater withdrawals that will be less than historic pumpage onsite, information has not been provided to Staff to prove that adjacent property owners are not impacted now and will not be impacted in the future. Without providing the location of proposed irrigation wells and drawdown contours the applicant's assumption that there will be no impacts to adjacent properties cannot be supported.
18. Please note the proposed irrigation system must be designed to meet the Lee County Water Conservation ordinance as amended.

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