

July 28, 2025

Electronic Delivery

Mr. Adam Mendez, Principal Planner
Lee County Department of Community Development
1500 Monroe Street
Fort Myers, Florida 33901

Re: Insufficiency Response - DCI2024-00043 Singletary CPD

Dear Mr. Mendez,

The purpose of this letter is to provide a response to the Lee County Department of Community Development's review comments dated April 23, 2025. The relevant application materials have been revised to reflect the review comments and with this letter we are submitting the following additional information you requested:

1. Revised Environmental Report with FLUCCS Mapping
2. Surface Water Quality Monitoring Plan
3. Letter of No Objection-Bayshore Fire
4. Revised Master Concept Plan

Presented below are responses to each review comment. We believe that we have addressed all comments appropriately and would respectfully request the case be scheduled for the Hearing Examiner. We appreciate the coordination and assistance from Staff over the past few months related to this application.

DEVELOPMENT SERVICES

Comment 1: Please provide a Letter of No Objection from the responding Fire Department (Bayshore Fire) in regards to Deviation #2 from LDC Section 10-291(3).

RESPONSE: Please see attached letter of no objection from Bayshore Fire Department relating to Deviation #2.

Comment 2: Note #3 on both Master Concept Plan Options should be removed. If internal access points were to be modified at the time of Development Order, then an amendment to the previously approved zoning action will be required

RESPONSE: Please refer to revised MCP. Note #3 has been removed.

Comment 3: NOTE: Please ensure that the proposed internal access points are meeting the connection separation requirements set forth in LDC Section 10-285.

RESPONSE: So noted. All proposed internal access points will meet and connection separation requirements set forth in LDC Section 10-285.

Comment 4: NOTE: The proposed cul-de-sacs will need to comply with LDC Section 10-296(k) at time of Development Order.

RESPONSE: So noted.

ENVIRONMENTAL

Comment 1: Staff completed a site inspection and could not confirm the amounts of exotic invasive vegetation as was described on the FLUCCS map in the protected species survey.

RESPONSE: Please see the attached revised FLUCCS Map and Environmental Assessment.

Comment 2: Staff recommend the following condition related to wetlands and surface waters, "developer may not commence construction on development impacting wetlands until issuance of required permits. Development activity must comply with state wetland permits and applicable local development permits. If the State does not approve wetland impacts or if the State wetland permits are not consistent with proposed wetland impacts reflected in County development permits, then developer must amend local development permit approvals to be consistent with State wetland permits or applicable Lee Plan and LDC regulations regarding development within wetlands."

RESPONSE: So noted.

Comment 3: Pursuant to LDC 34-414 and LDC 10-415, the minimum open space for each parcel/tract is 10%, and the total overall open space is 30%. Revise the MCP's to show the open space amounts.

RESPONSE: Please see revised MCP.

Comment 4: Staff completed a site inspection of the property and have concerns about the reduced buffer requested along the southern boundary as it does not appear to provide sufficient buffering to the affected properties. Revise the southern buffer so it provides equal or better buffering to the adjacent residential uses

RESPONSE: Deviation 3 was submitted to request an alternative buffer to the Type C/F and permit a Type D buffer. The main difference between a Type C and Type D buffer are a screening wall and the height of the hedge row.

As identified in the previous response, the existing residential south of the drainage easement aligns with the proposed indigenous preservation and will not be negatively impacted by the request. Specifically, deviation #3 is requested for approximately 780 linear feet of the southern property boundary. Across the flag portion of the lot immediately adjacent to the southern property boundaries are vacant and developed with a structure supporting agricultural operations. The residential structure identified by staff is immediately south of the lake tract and indigenous preservation. The requested deviation does not negatively affect the existing residential on the surrounding properties.

The applicant acknowledges that the schedule of uses incorporates some light industrial uses that could be developed near the southern property boundary. The applicant further acknowledges that additional height may be appropriate for the required double hedge row if these uses are developed on-site. Additional coordination on appropriate conditioning can occur during the substantive application review/staff report preparation.

Comment 5: Indigenous plant communities are defined in LDC 10-1 and further described in LDC 10-701. The submitted environmental report did not provide the exotic descriptor values, and several plants included in the vegetation communities are exotic invasive species. Since the development is greater than five acres in size, abuts an arterial or collector road, and has existing native trees within 50-feet of the right-of-way. If a site inspection from staff confirms the site does not contain indigenous plant communities, then the project will be subject to conformance with LDC Section 10-415(b)b.4.

RESPONSE: So noted. At the time of Development Order the ROW buffer can be modified to reflect the existing vegetation on-site at that time and comply with LDC requirements.

NATURAL RESOURCES

Comment 1: Please provide a surface water quality monitoring plan to demonstrate compliance with Lee Plan policies 125.1.2 and 125.1.4. The project is proposing to outfall into a natural waterway that conveys water through several properties prior to discharging into an impaired waterway.

RESPONSE: Please see the attached Water Quality Monitoring Plan from Water Science Associates.

Comment 2: Staff observed a culvert that conveys offsite flows from the northern property through the subject property. Please provide additional details addressing how these flows will be maintained per Lee Plan policy 126.1.4. The SW Narrative said these flows will be maintained but the MCP depicts an area of compensatory floodplain storage being created.

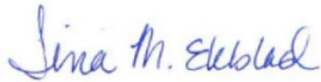
RESPONSE: The compensatory flood plan storage will be outside of the internal surface water management system. This area will be scraped down to increase storage for the surrounding aeras and will improve the ability for water to pass through and eliminate the need for the culvert.

Comment 3: Is the applicant anticipating using groundwater to supplement the wet detention lake that is planned to be utilized as an irrigation source? What aquifer will be utilized to supplement the irrigation lake? Surrounding properties utilize the Sandstone aquifer as a domestic water use. Please address how proposed irrigation source will interact with surrounding properties.

RESPONSE: The applicant has not designed the irrigation system at this type. The applicant acknowledges that Policy 61.1.6 prioritizes reuse water and if not available surface or low quality groundwater for irrigation. A Water Use Permit will be obtained from SFWMD and a Development Order will be obtained from Lee County to support the required irrigation and ultimate development of the property consistent with this policy.

If you should have any questions or require additional information, please do not hesitate to contact me at 561-797-0288 or tekblad@sageentitlements.com.

Sincerely,



Tina M. Ekblad, MPA, AICP
Founder | Principal



BAYSHORE FIRE PROTECTION AND RESCUE SERVICE DISTRICT

17350 Nalle Road, North Fort Myers, Florida 33917

Business: 239-543-3443 Fax: 239-543-7075

"Serving With Pride"

June 19, 2025

Brent Addison
Director
ATWELL, LLC
10511 Six Mile Cypress Pkwy, Suite 101
Fort Myers, FL 33966

Mr. Addison,

I have reviewed the documentation provided via email for the proposed commercial project located at 18200 State Road 31, Alva Fl. Bayshore Fire Protection and Rescue Services District has no objections to eliminating the secondary access as requested, provided that the main entrance is designed and built in a manner that both ingress and egress lanes independently meet the requirements for unobstructed 20' fire department access lanes and turnarounds as required in the Florida Fire Prevention Code, and Lee County Land Development Code

The District reserves the right to review the design of the entrance and enforce all applicable fire codes and ordinances as it relates to this deviation. Please feel free to contact me if I can be of any further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "W Underwood".

William Underwood
Fire Chief
Bayshore Fire Rescue

SINGLE TARY PROPERTY – 18200 STATE ROAD 31 (16.80± ACRES)

**ENVIRONMENTAL ASSESSMENT
& CURSORY SPECIES SURVEY REPORT**

Lee County STRAP #: 18-43-26-00-00001.0060

June 2024

Updated April 2025

Prepared For:

Atwell, LLC.
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Introduction

An environmental assessment and species survey was conducted on the Singletary SR 31 property on June 4, 2024. The 16.80± acre site is located in Section 18, Township 43S, and Range 26E, of Lee County, Florida. More specifically, the site is located at 18200 State Road 31, east of Babcock Ranch Road, north of Bayshore Road and south of North River Road, in Alva, Florida. Please see the attached Project Location Map (Exhibit A).

The purpose of this assessment was to identify the potential for either U.S. Army Corps of Engineers (ACOE) Department of Environmental Protection (DEP), and/or South Florida Water Management District (SFWMD) jurisdictional wetlands. The site was also assessed to determine the potential of listed (endangered, threatened, etc.) species inhabiting the site that are regulated by the U.S. Fish & Wildlife Service (FWS) and the Florida Fish & Wildlife Conservation Commission (FWC).

Listed (endangered, threatened, etc.) species are regulated by the US Fish & Wildlife Service (FWS) and/or the Florida Fish & Wildlife Conservation Commission (FWC). Specific attention was paid toward that of locating any gopher tortoise (*Gopherus polyphemus*) and/or burrowing owl (*Athene cunicularia floridana*) burrows, as well as locating any potential fox squirrel (*Sciurus niger*) nests, Florida bonneted bat (*Eumops floridanus*) or red-cockaded woodpecker (*Leuconotopicus borealis*) cavity trees, and any bald eagle (*Haliaeetus leucocephalus*) nests.

The project's surrounding land uses are a mixture of residential homes, commercial and industrial developments, undeveloped vacant land, and forested land. The surveys were conducted throughout the day; the temperatures were in the low-mid 80's, with light breezes, and partly cloudy to mostly cloudy skies.

Background

The ACOE, DEP, and the SFWMD are the agencies that regulate development activities in wetlands. To be considered wetlands by the ACOE, DEP, and/or SFWMD, the area should exhibit wetland hydrology, contain wetland vegetation, and have hydric soils. For an area to be considered wetlands, a site should have hydric soils, wetland hydrology, and wetland vegetation present. The property was reviewed for indicators of these parameters.

Hydric soils are identified by certain characteristics that are unique to wetland soils. Wetland hydrology is normally present if the soil is saturated or inundated for a period of time; typically from May through November; the rainy season in Southwest Florida. In the absence of visual signs of saturation or inundation, the regulatory agencies typically use hydrologic indicators such as adventitious rooting, lichen lines, or algal matting as method of guidance. If the majority of the shrubs/plants that are present are those that are adapted to saturated soil conditions, it's likely wetland vegetation.

The FWS and FWC are the primary agencies that review potential impacts to listed species. The FWS reviews potential impacts and provides comments to the ACOE and DEP during the permitting process, while the FWC provides comments to the SFWMD. In general, the wildlife agency concerns need to be addressed in order for the permits to be authorized by the ACOE, DEP, and/or the SFWMD.

Methodology

The protected species survey methodology consisted of overlapping parallel transects performed for all FLUCFCS communities on-site. The frequency of transects performed in these habitats, unless otherwise discussed, were designed to meet the minimum coverage requirements. This method is comprised of a several step process; the vegetation communities or land-uses on the study area are delineated on an aerial photograph using the Florida Land Use, Cover and Forms Classification System (FLUCFCS). Next, these FLUCFCS codes are cross-referenced with the Lee County Protected Species List. With a list of the potential listed plants and animals, each FLUCFCS community is searched in the field for these species.

An intensive pedestrian survey is conducted using parallel belt transects that are approximately 10-20 feet apart, depending upon both the thickness of vegetation and visibility, as a means of searching for plants and animals. In addition, periodic “stop-look-listen” and quiet stalking methods are conducted for animals. Signs or sightings of these species are then recorded. The table at end of the report lists the FLUCFCS communities found on the parcel and the corresponding species which have a probability of occurring in them.

Existing Site Conditions

Boundary – The project boundary was obtained from the Lee County parcel data and is assumed to be approximately 16.80± acres.

Soils - The soils on the property have been mapped by the National Resource Conservation Service (NRCS, formerly the Soil Conservation Service). These mappings are general in nature but can provide a certain level of information about the site as to the possible extent of wetland area. The agencies commonly use these mappings as justification for certain wetland/upland determinations. According to these mappings, the parcel is underlain by Boca fine sand (NRCS #13; non-hydric), Copeland sandy loam, depressional (NRCS #45; hydric), and Matlacha gravelly fine sand (NRCS #69; non-hydric) soils. Boca fine sand, Matlacha gravelly fine sand are considered non-hydric at both the local and national levels. Please see the attached NRCS Soils Map (Exhibit D).

Vegetation Descriptions – Vegetation is one parameter used in determining the presence of uplands or wetlands; these community mappings will generally reflect what a specific area could be considered by the regulatory agencies. We identified approximately 4.13± acres of wetlands and 0.35± acres of “other surface water” communities on-site, during the initial site assessment.

While on-site, generalized community delineations are hand-drawn on an aerial defining the different vegetation associations on-site. These general delineations were based on the nomenclature of the Florida Land Use, Cover and Forms Classification System (FLUCFCS), Level III and IV (FDOT 1999). Please see the attached FLUCFCS Map with Aerial (Exhibit B) and FLUCFCS Map without Aerial (Exhibit C). Listed below are the vegetation communities and land-uses identified on the site.

FLUCFCS Codes & Community Descriptions

Uplands

The following community areas have been designated as upland habitats. Uplands are any area that does not qualify as a wetland because the associated hydrologic regime is not sufficiently wet enough to elicit development of vegetation, soils, and/or hydrologic characteristics associated with wetlands.

FLUCFCS 110 Residential – 1.16± Acres

This residential property contains a driveway, residential home, and several other buildings including barns, sheds, and storage containers. This community occupies approximately 1.16± acres of the site. This community would be considered uplands by regulatory agencies.

FLUCFCS 211 E1 Improved Pasture (Exotics 1-24%) – 5.40± Acres

This upland community type occupies approximately 5.40± acres. The canopy and sub-canopy is mostly open with widely scattered slash pine (*Pinus elliotti*), live oak (*Quercus virginiana*), melaleuca (*Melaleuca quinquenervia*), and earleaf acacia (*Acacia auriculiformis*). Sub-canopy species include cabbage palm (*Sabal palmetto*). The groundcover is dominated by Ground cover is dominated by bahia grass (*Paspalum notatum*) with spiny amaranth (*Amaranthus spinosus*), rosy camphorweed (*Pluchea rosea*), dog fennel (*Eupatorium capillifolium*), ragweed (*Ambrosia trifida*), dollarweed (*Hydrocotyle umbellata*), caesar weed (*Urena lobata*), hairy beggar-ticks (*Bidens alba*), tickseed (*Coreopsis floridana*), frog fruit (*Phyla nodiflora*), smutgrass (*Sporobolus sp.*), false buttonweed (*Spermacoce verticillata*), three-awn grass (*Aristida purpurea*), flattop goldenrod (*Euthamia caroliniana*), and other various opportunistic weedy species. Commonly observed vines include greenbriar (*Smilax sp.*), grapevine (*Vitis rotundifolia*), and peppervine (*Ampelopsis arborea*). This community should be considered uplands by regulatory agencies.

FLUCFCS 411 E1 Pine Flatwoods (Exotics 1-24%) – 0.66± Acres

This upland community type occupies approximately 0.66± acres of the property. The canopy is dominated by slash pine (*Pinus elliottii*) with scattered live oak (*Quercus virginiana*), laurel oak (*Quercus laurifolia*), earleaf acacia (*Acacia auriculiformis*), and melaleuca (*Melaleuca quinquenervia*). The sub-canopy contains cabbage palm (*Sabal palmetto*), rusty lyonia (*Lyonia ferruginea*), and Brazilian pepper (*Schinus terebinthifolius*). The ground cover is dominated by saw palmetto (*Serenoa repens*), with pennyroyal (*Piloblephis rigida*), caesar weed (*Urena lobata*), Spanish needle (*Bidens alba*), and broom sedge (*Andropogon virginicus*), with other opportunistic weedy species. Commonly observed vines include grapevine (*Vitis munsoniana*), greenbriar (*Smilax spp.*), and poison ivy (*Toxicodendron radicans*). This community should be considered uplands by the regulatory agencies.

FLUCFCS 420 E1 Mixed Upland Forest (Exotics 1-24%) – 1.48± Acres

This upland community type occupies approximately 1.48± acres of the property. The canopy contains live oak (*Quercus virginiana*), with slash pine (*Pinus elliottii*), java plum (*Syzygium cumim*), earleaf acacia (*Acacia auriculiformis*), and mimosa (*Albizia julibrissin*). The sub-canopy contains cabbage palm (*Sabal palmetto*), Brazilian pepper (*Schinus terebinthifolius*), wild coffee (*Psychotria nervosa*), buckthorn (*Sideroxylon celastrinum*), wax myrtle (*Myrica cerifera*), myrsine (*Rapanea guinensis*), and beauty berry (*Callicarpa americana*). The ground cover includes scattered saw palmetto (*Serenoa repens*), with coco plum (*Chrysobalanus icaco*), dog fennel (*Eupatorium capillifolium*), caesar weed (*Urena lobata*), false buttonweed (*Spermacoce verticillata*), and other various opportunistic weedy species. Commonly observed vines include grapevine (*Vitis rotundifolia*), poison ivy (*Toxicodendron radicans*), greenbriar (*Smilax sp.*), and creeping oxeye (*Sphagnetocola trilobata*). This community would be considered uplands by the regulatory agencies. This community would be considered uplands by the regulatory agencies.

FLUCFCS 420 E2 Mixed Upland Forest (Exotics 25-49%) – 2.84± Acres

This upland community type occupies approximately 2.84± acres of the property. The canopy and sub-canopy is similar to the community above; however, it contains melaleuca (*Melaleuca quinquenervia*), earleaf acacia (*Acacia auriculiformis*), and Brazilian pepper (*Schinus terebinthifolius*), dominating 25-49% of the community. The canopy contains live oak (*Quercus virginiana*), with slash pine (*Pinus elliottii*), java plum (*Syzygium cumim*), earleaf acacia (*Acacia auriculiformis*), and mimosa (*Albizia julibrissin*). The sub-canopy contains cabbage palm (*Sabal palmetto*), Brazilian pepper (*Schinus terebinthifolius*), wild coffee (*Psychotria nervosa*), buckthorn (*Sideroxylon celastrinum*), wax myrtle (*Myrica cerifera*), myrsine (*Rapanea guinensis*), and beauty berry (*Callicarpa americana*). The ground cover includes scattered saw palmetto (*Serenoa repens*), with coco plum (*Chrysobalanus icaco*), dog fennel (*Eupatorium capillifolium*), caesar weed (*Urena lobata*), false buttonweed (*Spermacoce verticillata*), and other various opportunistic weedy species. Commonly observed vines include grapevine (*Vitis rotundifolia*), poison ivy (*Toxicodendron radicans*), greenbriar (*Smilax* sp.), and creeping oxeye (*Sphagneticola trilobata*). This community would be considered uplands by the regulatory agencies. This community would be considered uplands by the regulatory agencies.

FLUCFCS 422 Brazilian Pepper – 0.14± Acres

This upland community type occupies approximately 0.14± acres of the site. The canopy was mostly open. The sub-canopy was dominated by Brazilian pepper (*Schinus terebinthifolius*), with scattered cabbage palm (*Sabal palmetto*). The groundcover was mostly open with various opportunistic weedy species. This community would be considered uplands by the regulatory agencies.

FLUCFCS 428 E1 Cabbage Palm (Exotics 1-24%) – 0.64± Acres

This upland community type occupies approximately 0.64± acres of the property. The canopy is dominated by cabbage palm (*Sabal palmetto*), with scattered slash pine (*Pinus elliottii*), laurel oak (*Quercus laurifolia*), and live oak (*Quercus virginiana*). The sub-canopy also contains cabbage palm (*Sabal palmetto*), with Brazilian pepper (*Schinus terebinthifolius*), myrsine (*Rapanea punctata*), saltbush (*Baccharis halimifolia*), buckthorn (*Sideroxylon celastrinum*), beauty berry (*Callicarpa Americana*), wild coffee (*Psychotria nervosa*), and wax myrtle (*Myrica cerifera*). The ground cover is mostly open with scattered Spanish needle (*Bidens alba*), false buttonweed (*Spermacoce floridan*), caesar weed (*Urena lobata*), ragweed (*Ambrosia artemisiifolia*), broomsedge (*Andropogon virginicus*), and bahia grass (*Paspalum notatum*), with various other opportunistic weedy species. Commonly observed vines include grapevine (*Vitis munsoniana*), greenbriar (*Smilax* spp.), peppervine (*Ampelopsis arborea*), and poison ivy (*Toxicodendron radicans*). This community should be considered uplands by the regulatory agencies.

Other Surface Waters (OSW)

The following community area has been designated as other surface waters. Surface waters are waters on the surface of the earth, contained in bounds created naturally or artificially.

FLUCFCS 520 Cow Pond – 0.35± Acres

This “other surface water” (OSW) community occupies approximately 0.35± acres of the property and consists of shallow cow ponds. The sub-canopy is mostly open with scattered Carolina willow (*Salix caroliniana*), wax myrtle (*Myrica cerifera*), and saltbush (*Baccharis halimifolia*) along the edges. The ground cover includes asiatic pennywort (*Centella asiatica*), spikerush (*Eleocharis interstincta*), smart weed (*Polygonum hydropiperoides*), water hyacinth (*Eichhornia crassipes*), torpedo grass (*Panicum repens*), maidencane (*Panicum hemitomon*), mermaid weed (*Proserpinaca pectinata*), water hyssop (*Bacopa monnieri*), flatsedge (*Cyperus ligularis*), and torpedo grass (*Panicum repens*). This community would be considered “other surface waters” by the regulatory agencies. This community was artificially created and would be considered “other surface waters” by the regulatory agencies.

Wetlands

The following community areas have been designated as wetland habitats. Wetlands are any areas that under normal circumstances have hydrophytic vegetation, hydric soils, and wetland hydrology.

FLUCFCS 618 E3 Wax Myrtle & Willow Wetland (Exotics 50-74%) – 0.63± Acres

This wetland community type occupies approximately 0.63± acres of the property. The canopy is dominated by Carolina willow (*Salix caroliniana*), with scattered laurel oak (*Quercus laurifolia*), and bald cypress (*Taxodium distichum*). The sub-canopy contains wax myrtle (*Myrica cerifera*), and buttonbush (*Cephalanthus occidentalis*), with Brazilian pepper (*Schinus terebinthifolius*) along the perimeter of the wetland. The ground cover vegetation includes swamp fern (*Blechnum serrulatum*), yellow-eyed grass (*Xyris floridana*), rosy camphorweed (*Pluchea rosea*), dollar weed (*Hydrocotyle umbellata*), little blue maidencane (*Amphicarpum muhlenbergianum*), frog fruit (*Phyla nodiflora*), false buttonweed (*Spermacoce verticillata*), swamp lily (*Crinum americanum*), mock bishop’s weed (*Ptilimnium capillaceum*), smart weed (*Polygonum hydropiperoides*), pickerel weed (*Pontederia cordata*), arrowhead (*Sagittaria latifolia*), fire flag (*Thalia geniculata*), and white-top sedge (*Rhynchospora colorata*), with various other grasses and sedges. Commonly observed vines include greenbriar (*Smilax* spp.) and Japanese climbing fern (*Lygodium japonicum*). This community does contain some transitional wetland vegetation, advantageous rooting, water line staining, and algal matting, as well as other signs in this community that would be classified as wetlands. This community would be considered wetlands by the regulatory agencies.

FLUCFCS 620 E2 Mixed Wetland Hardwoods (Exotics 25-49%) – 1.33± Acres

This wetland community type occupies approximately 1.33± acres of the property. The canopy contains slash pine (*Pinus elliottii*), laurel oak (*Quercus laurifolia*), and red maple (*Acer rubrum*). The sub-canopy vegetation includes Brazilian pepper (*Schinus terebinthifolius*), cabbage palm (*Sabal palmetto*), myrsine (*Rapanea punctata*), dahoon holly (*Ilex cassine*), beauty berry (*Callicarpa Americana*), buckthorn (*Sideroxylon celastrinum*), saltbush (*Baccharis halimifolia*), buttonbush (*Cephalanthus occidentalis*), wax myrtle (*Myrica cerifera*), and melaleuca (*Melaleuca quinquenervia*). The ground cover vegetation includes swamp fern (*Blechnum serrulatum*), black needlerush (*Juncus roemerianus*), beakerush (*Cyperus* sp.), yellow-eyed grass (*Xyris floridana*), sawgrass (*Cladium jamaicense*), leather fern (*Acrostichum daneifolium*), rosy camphorweed (*Pluchea rosea*), cocoa plum (*Chrysobalanus icaco*), dollarweed (*Hydrocotyle umbellata*), flatsedge (*Cyperus ligularis*), and shield fern (*Dryopteris ludoviciana*). Commonly observed vines include grapevine (*Vitis rotundifolia*), Virginia creeper (*Parthenocissus quinquefolia*), peppervine (*Ampelopsis arborea*), and greenbriar (*Smilax* spp.). This community

does contain some transitional wetland vegetation, advantageous rooting, water line staining, and algal matting, as well as other signs in this community that would be classified as wetlands. This community would be considered wetlands by the regulatory agencies.

FLUCFCS 624 E2 Oak – Pine – Cabbage Palm (Exotics 25-49%) – 1.54± Acres

This wetland community type occupies approximately 1.54± acres of the property. The canopy contains laurel oak (*Quercus laurifolia*) and slash pine (*Pinus elliottii*), with scattered melaleuca (*Melaleuca quinquenervia*). The sub-canopy contains cabbage palm (*Sabal palmetto*), Brazilian pepper (*Schinus terebinthifolius*), myrsine (*Rapanea punctata*), wax myrtle (*Myrica cerifera*), primrose willow (*Ludwigia peruviana*), saltbush (*Baccharis halimifolia*), buckthorn (*Sideroxylon celastrinum*), and buttonbush (*Cephalanthus occidentalis*). The ground cover vegetation includes swamp fern (*Blechnum serrulatum*), yellow-eyed grass (*Xyris floridana*), rosy camphorweed (*Pluchea rosea*), dollarweed (*Hydrocotyle umbellata*), torpedo grass (*Panicum repens*), St. Johns wort (*Hypericum perforatum*), mermaid weed (*Proserpinaca palustris*), water hyssop (*Bacopa monnieri*), and flatsedge (*Cyperus ligularis*). Commonly observed vines include climbing hempvine (*Mikania scandens*), and greenbriar (*Smilax* spp.). This community does contain some transitional wetland vegetation, advantageous rooting, water line staining, and algal matting, as well as other signs in this community that would be classified as wetlands. This community would be considered wetlands by the regulatory agencies.

FLUCFCS 641 E3 Freshwater Marsh (Exotics 50-74%) – 0.28± Acres

This wetland community type occupies approximately 0.28± acres of the property. The canopy is mostly open with scattered Carolina willow (*Salix caroliniana*), and melaleuca (*Melaleuca quinquenervia*). The sub-canopy contains primrose willow (*Ludwigia peruviana*), with saltbush (*Baccharis halimifolia*), wax myrtle (*Myrica cerifera*), and Brazilian pepper (*Schinus terebinthifolius*) along the edges. The ground cover includes torpedo grass (*Panicum repens*), swamp fern (*Blechnum serrulatum*), fire flag (*Thalia geniculata*), yellow-eyed grass (*Xyris floridana*), cat-tail (*Typha latifolia*), rosy camphorweed (*Pluchea rosea*), sand cordgrass (*Spartina* sp.), dog fennel (*Eupatorium capillifolium*), mermaid-weed (*Proserpinaca palustris*), corkwood (*Stillingia aquatica*), asiatic pennywort (*Centella asiatica*), dollar weed (*Hydrocotyle umbellata*), frog fruit (*Phylla nodiflora*), maidencane (*Panicum hemitomon*), mock bishop's weed (*Ptilimnium capillaceum*), and white-top sedge (*Rhynchospora colorata*), with other various grasses and sedges. This community does contain some transitional wetland vegetation, advantageous rooting, water line staining, and algal matting, as well as other signs in this community that would be classified as wetlands. This community would be considered wetlands by the regulatory agencies.

FLUCFCS 643 E3 Wet Prairie (Exotics 50-74%) – 0.35± Acres

This wetland community type occupies approximately 0.35± acres of the property. The canopy is mostly open. The sub-canopy contains scattered cabbage palm (*Sabal Palmetto*), wax myrtle (*Myrica cerifera*), primrose willow (*Ludwigia peruviana*), myrsine (*Rapanea punctata*), and Brazilian pepper (*Schinus terebinthifolius*) along the perimeter of the wetland. The ground cover includes asiatic pennywort (*Centella asiatica*), spikerush (*Eleocharis interstincta*), cat-tail (*Typha latifolia*), smart weed (*Polygonum hydropiperoides*), yellow-eyed grass (*Xyris floridana*), pickerel weed (*Pontederia cordata*), arrowhead (*Sagittaria latifolia*), torpedo grass (*Panicum repens*), white-top sedge (*Rhynchospora colorata*), maidencane (*Panicum hemitomon*), mermaid weed (*Proserpinaca pectinata*), and water hyssop (*Bacopa monnieri*). Commonly observed vines include climbing hempvine (*Mikania scandens*). This community does contain wetland vegetation, advantageous rooting, water line staining, and algal matting, as well as other signs in this community that would be classified as wetlands. This community would be considered wetlands by the regulatory agencies.

Table 1. FLUCFCS Community Table

FLUCFCS Code	Community Description	Habitat Type	Acres
110	Residential	Upland	1.16± Ac.
211 E1	Improved Pasture (Exotics 1-24%)	Upland	5.40± Ac.
411 E1	Pine Flatwoods (Exotics 1-24%)	Upland	0.66± Ac.
420 E1	Mixed Upland Forest (Exotics 1-24%)	Upland	1.48± Ac.
420 E2	Mixed Upland Forest (Exotics 25-49%)	Upland	2.84± Ac.
422	Brazilian Pepper	Upland	0.14± Ac.
428 E1	Cabbage Palm (Exotics 1-24%)	Upland	0.64± Ac.
520	Cow Pond	OSW	0.35± Ac.
618 E3	Wax Myrtle & Willow Wetland (Exotics 50-74%)	Wetland	0.63± Ac.
620 E2	Mixed Wetland Forest (Exotics 25-49%)	Wetland	1.33± Ac.
624 E2	Oak – Pine – Cabbage Palm (Exotics 25-49%)	Wetland	1.54± Ac.
641 E3	Freshwater Marsh (Exotics 50-74%)	Wetland	0.28± Ac.
643 E3	Wet Prairie (Exotics 50-74%)	Wetland	0.35± Ac.
Total			16.80± Ac.

Species Survey Results

A cursory listed species survey was conducted on the project site on June 4, 2024 to determine if the site was being utilized by wildlife species listed by the Florida Fish and Wildlife Conservation Commission (FWCC) and the U.S. Fish and Wildlife Services (USFWS), or by a protected species as designated by Lee County. There were no protected species identified on-site. In addition to the on-site assessment, FWCC and USFWS databases were researched to determine if documented occurrences of listed species exist on or around the project site. The following are the results of the database search.

The project site is listed within the Audubon's crested caracara (*Caracara plancus audubonii*) Consultation Area. During the listed species survey conducted on-site, the project site was surveyed for the crested caracara, but there were no caracara and/or caracara nests identified on-site.

Big Cypress fox squirrels (*Sciurus niger avicenniai*) are identified by the Florida Fish and Wildlife Conservation Commission (FWC) as a threatened species. The primary habitats utilized by this species includes open pine flatwoods, cypress strands, broad-leaf evergreen hammocks, mangroves, and oak forest. These squirrels feed on cypress balls, pine seed, and occasionally cabbage palm and saw palmetto berries. BCFS spend a considerable amount of time foraging on the ground with their optimal habitat consisting of open atmosphere. They are usually active during the day; their nests are constructed for resting, sleeping and breeding. They utilize stick and leaves nests in pines, cypress, cabbage palms, and melaleuca; nests in tree hollows; and nests in bromeliads.

The Florida bonneted bat (*Eumops floridanus*) is also listed as endangered by the FWS and the FWC. The FWS has established a Consultation Area and several Focal Areas for this species. The Florida bonneted bat is listed by the FWCC and USFWS as endangered. The property is located within the overall Consultation Area; however, it remains outside of the Focal Areas. The USFWS may require specific surveys (ie. cavity tree survey and/or multi-night acoustic surveys) to determine if the site is being utilized by the Florida bonneted bat. No Florida bonneted bats were observed on the project site during the preliminary listed species survey.

The Audubon Eagle Watch database for bald eagle (*Haliaeetus leucocephalus*) nests shows that the nearest nest is Nest LE-039, located about approximately 1.5 miles southeast of the project's eastern property boundary. The bald eagle nest database is current through the 2023-2024 nesting season. Nest LE-039 was documented as destroyed by Audubon for the 2023 nesting season. Additionally, there were no bald eagle nests observed on or immediately adjacent to the property during the preliminary listed species survey. This distance is beyond the USFWS and the FWCC recommended 660-foot buffer protection zone for active and alternate bald eagle nests. The bald eagle was delisted under the Federal Endangered Species Act (ESA) in 2007, but it is still protected under the Bald and Golden Eagle Protection Act.

The Florida Atlas of Breeding Sites for Herons and Their Allies was referenced for the location of breeding colonies of both listed and non-listed wading birds including, but not limited to, the snowy egret (*Egretta thula*), roseate spoonbill (*Platalea ajaja*), little blue heron (*Egretta caerulea*), wood stork (*Mycteria americana*), and tri-colored heron (*Egretta tricolor*). There was no evidence to breeding rookeries located on the project site.

The USFWS Draft Standard Local Operating Procedures for Endangered Species Wood Storks (*Mycteria americana*) recognizes a $30\pm$ kilometer ($18.6\pm$ mile) zone surrounding a colony boundary as a core foraging area (CFA). The project site is located within the CFA designated for the wood stork. The project will abide by habitat guidelines and the standard protection measures for the Wood Stork. The wetland habitat and surface waters on-site are considered of poor quality for foraging habitat. If future development will impact these habitat types, coordination with the FWCC and/or the USFWS and compensation for impacts to wood stork foraging habitat may be required. The wood stork is listed as a state and federally threatened species.

The Florida Atlas of Breeding Sites for Herons and Their Allies (Runde *et al.* 1991) and the FWCC database were referenced for the locations of breeding colonies for both listed and non-listed wading birds including, but not limited to, snowy egret (*Egretta thula*), roseate spoonbill (*Ajaia ajaja*), little blue heron (*Egretta caerulea*), and tri-colored heron (*Egretta tricolor*). The FWCC information is current through 1999. According to these sources, there are no wading bird colonies on-site or in close vicinity of the project site.

The FWCC database for the and/or red-cockaded woodpecker (*Leuconotopicus borealis*) locations shows that this project is located within the red-cockaded woodpecker (RCW) consultation area. There may be some additional site specific surveys may be required by the permitting agencies to verify the presence/absence of the RCW on the project site. There were no RCWs or signs thereof (i.e., live cavity trees) identified on the project during the cursory listed species survey.

Mitigation Discussion

Generally, the ACOE and/or DEP does not regulate isolated wetlands or excavation in wetlands where there is only incidental fall back of fill material; the ACOE or DEP do not have jurisdiction over isolated wetlands. In making the determination on whether the wetlands are isolated, the ACOE and DEP considers if water leaves the site, (i.e. ditches) or whether the wetlands are completely contained on-site or extend off-site. If the wetlands extend off-site, they will more than likely assert jurisdiction. Currently, the ACOE and DEP position on most all wetlands is that one of them has jurisdiction; the ACOE regulates navigable waters whereas the DEP regulates both navigable waters and adjacent wetlands. However, the agencies would not make this determination until a Joint Environmental Resource Permit (ERP) and Dredge & Fill Permit (D&F) application is received.

The SFWMD does not require mitigation for impacts to isolated wetlands not used by listed (protected) species that are less than 0.50± acres in size. Impacts to wetlands greater than 0.50± acres or those utilized by protected species would require mitigation. With the ACOE and DEP, impacts to wetlands that are less than 0.50± acres, the activity can usually be processed as a Nationwide Permit application. For projects with greater than 0.50± acres of impacts, the application will be processed as an Individual Permit application. This involves a public notice process and coordination with other federal agencies such as the EPA and the FWS.

There are three steps that are required to be addressed when requesting an ERP permit with the SFWMD and/or the DEP for impacts to regulated wetlands:

- 1) Avoidance (i.e. can these wetland impacts be completely avoided)
- 2) Minimization (i.e. can the amount of wetland impact be reduced while maintaining a feasible project)
- 3) Mitigation (i.e. the loss of wetland function must be replaced)

It should be noted that avoidance and minimization must first be substantiated, before mitigation will be considered by the agencies. When wetlands are proposed to be impacted, the impacts cannot result in any loss of wetland function. In order to prevent net loss in wetland function, wetland mitigation must be provided. Mitigation is a way to off-set impacts to natural resources such as wetlands and may consist of wetland enhancement, wetland creation, wetland preservation, upland compensation, or off-site mitigation. Mitigation costs usually increase with the quantity of proposed impacts. The actual amount of mitigation required would be finalized during the Environmental Resource Permit review process with the SFWMD, ACOE, and DEP.

There are two main categories of wetland mitigation, onsite or off-site. On-site mitigation would include preserving a portion of the on-site wetlands, treating and removing the exotics, potentially providing supplemental plantings, and placing the preserve areas under a Conservation Easement. Preserve areas are required to be maintained in perpetuity. Off-site mitigation requires the purchase of wetland credits at an approved mitigation bank within the service area of the site. This parcel lies within the service area of several mitigation banks; currently, credits are going for \$200,000 to \$225,000 depending on the mitigation bank.

Summary

Due to the disturbed nature of the site, the surrounding land uses, and busy roadways, it is unlikely that this site supports or would provide habitat for protected species. Community locations were drawn using non-rectified aerial images with approximate property boundaries; hence their location, aerial extent, and acreage is approximate. Before any detailed site planning, it is recommended that the wetland lines are flagged, surveyed by professional land surveyor, and approved by the regulatory agencies.

The determination of ecological system classifications, functions, values, and boundaries is an inexact science, and different individuals and agencies may reach different conclusions. The on-site conditions can vary throughout the year; therefore, the findings of this survey were based upon the site conditions at the time of the inspection. It is not possible for BearPaws Environmental Consulting to guarantee the outcome of such determinations; therefore, the conclusions of this report are preliminary in nature and would require a full review by the appropriate regulatory agencies.

The information contained and the work performed as part of this initial assessment, conforms to the standards and generally accepted practices in the environmental field, and was prepared substantially in accordance with then-current technical guidelines and criteria. The conclusions of this report represent the results of our analysis of the information provided by the client and their consultants, together with information gathered in the course of the study. No other guarantee, expressed or implied, is made.

Table 2: Listed Species by Habitat with Current Status

FLUCFCS Code	FLUCFCS Description	Common Name	Scientific Name	Observed	USDA	FDA&CS	FWS	FWC
211	Improved Pasture	Florida Sandhill crane	<i>Grus canadensis pratensis</i>	--	--	--	--	T
212	Improved Pasture	Florida sandhill crane	<i>Grus canadensis pratensis</i>	--	--	--	--	T
213	Wooded Pasture	Florida sandhill crane	<i>Grus canadensis pratensis</i>	--	--	--	--	T
242	Sod Farm	Burrowing owl	<i>Athene cunicularia floridana</i>	--	--	--	--	SSC
261	Fallow Crop Lands	Burrowing owl	<i>Athene cunicularia floridana</i>	--	--	--	--	SSC
321	Palmetto Prairie	Audubon's crested caracara	<i>Polyborus plancus audubonii</i>	--	--	--	T	T
		Beautiful paw-paw	<i>Deeringothamnus pulchellus</i>	--	E	E	E	--
		Curtis milkweed	<i>Asclepias curtissii</i>	--	--	E	--	--
		Fakahatchee burmannia	<i>Burmannia flava</i>	--	--	E		
		Florida black bear	<i>Ursus americanus floridanus</i>	--	--	--	SAT	T
		Eastern indigo snake	<i>Drymarchon corais couperi</i>	--	--	--	T	T
		Gopher frog	<i>Rana areolata</i>	--	--	--	--	SSC
		Gopher tortoise	<i>Gopherus polyphemus</i>	--	--	--	T	T
		Florida black bear	<i>Ursus americanus floridanus</i>	--	--	--	SAT	T
		Florida coontie	<i>Zamia floridana</i>	--	--	C	--	--
		Florida sandhill crane	<i>Grus canadensis pratensis</i>	--	--	--	--	T
411	Pine Flatwoods	Southeastern American kestrel	<i>Falco sparverius paulus</i>	--	--	--	--	T
		Beautiful paw-paw	<i>Deeringothamnus pulchellus</i>	--	E	E	E	--
		Big cypress fox squirrel	<i>Sciurus niger avicennia</i>	--	--	--	--	SSC
		Eastern indigo snake	<i>Drymarchon corais couperi</i>	--	--	--	T	T
		Fakahatchee burmannia	<i>Burmannia flava</i>	--	--	E	--	--
		Florida black bear	<i>Ursus americanus floridanus</i>	--	--	--	SAT	T
		Florida coontie	<i>Zamia floridana</i>	--	--	C	--	--
		Gopher frog	<i>Rana areolata</i>	--	--	--	--	SSC
		Gopher tortoise	<i>Gopherus polyphemus</i>	--	--	--	T	T
		Red-cockaded woodpecker	<i>Picoides borealis</i>	--	--	--	E	SSC
422	Brazilian Pepper	N/A	--	--	--	--	--	--
		N/A	--	--	--	--	--	--
424	Melaleuca	N/A	--	--	--	--	--	--
		N/A	--	--	--	--	--	--
428	Cabbage Palm	Audubon's crested caracara	<i>Polyborus plancus audubonii</i>	--	--	--	T	T
		Eastern indigo snake	<i>Drymarchon corais couperi</i>	--	--	--	T	T
		Florida black bear	<i>Ursus americanus floridanus</i>	--	--	--	SAT	T
		Hand adder's tongue fern	<i>Ophioglossum palmatum</i>	--	--	E	--	--
		Simpson's stopper	<i>Myrcianthes fragrans var. simpsonii</i>	--	--	T	--	--
		Gopher tortoise	<i>Gopherus polyphemus</i>	--	--	--	T	T
500	Other Surface Water	American alligator	<i>Alligator mississippiensis</i>	--	--	--	SAT	SSC
		Everglades mink	<i>Mustela vison evergladensis</i>	--	--	--	--	T
		Limpkin	<i>Aramus guarauna</i>	--	--	--	--	SSC
		Little blue heron	<i>Egretta caerulea</i>	--	--	--	--	SSC
		Reddish egret	<i>Egretta rufescens</i>	--	--	--	--	SSC
		Roseate spoonbill	<i>Ajaia ajaja</i>	--	--	--	--	SSC
		Snowy egret	<i>Egretta thula</i>	--	--	--	--	SSC
		Tricolored heron	<i>Egretta tricolor</i>	--	--	--	--	SSC

Table 2 Cont'd: Listed Species by Habitat with Current Status

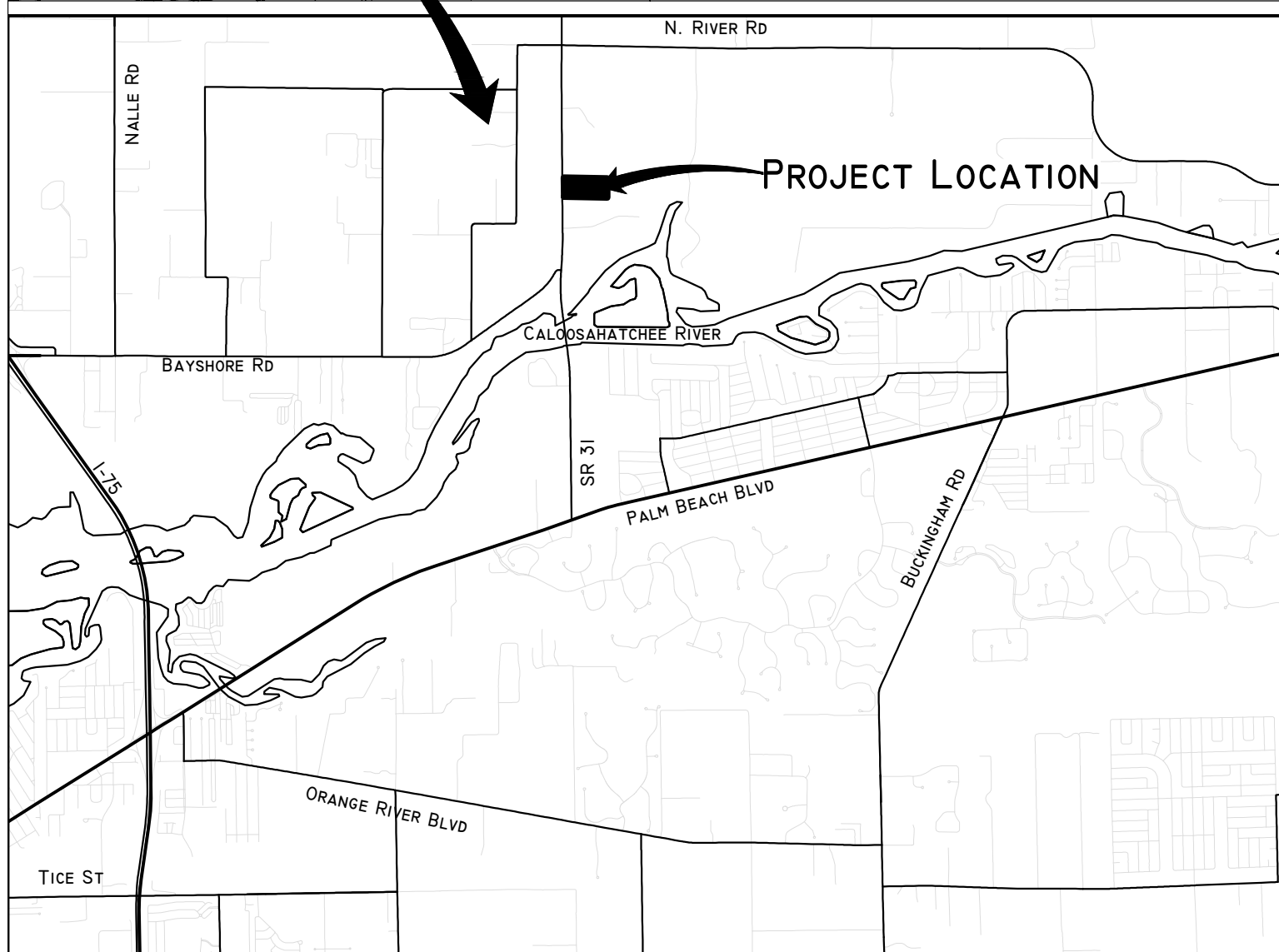
FLUCFCS Code	FLUCFCS Description	Common Name	Scientific Name	Observed	USDA	FDA&CS	FWS	FWC
617	Mixed Wetland Hardwoods	Florida black bear	<i>Ursus americanus floridanus</i>	--	--	--	SAT	T
		Limpkin	<i>Aramus quarauna</i>	--	--	--	--	SSC
		Little blue heron	<i>Egretta caerulea</i>	--	--	--	--	SSC
		Snowy egret	<i>Egretta thula</i>	--	--	--	--	SSC
		Tricolored heron	<i>Egretta tricolor</i>	--	--	--	--	SSC
621	Cypress	American alligator	<i>Alligator mississippiensis</i>	--	--	--	SAT	SSC
		Florida black bear	<i>Ursus americanus floridanus</i>	--	--	--	SAT	T
		Limpkin	<i>Aramus quarauna</i>	--	--	--	--	SSC
		Little blue heron	<i>Egretta caerulea</i>	--	--	--	--	SSC
		Snowy egret	<i>Egretta thula</i>	--	--	--	--	SSC
		Tricolored heron	<i>Egretta tricolor</i>	--	--	--	--	SSC
624	Cypress – Pine – Cabbage Palm	Wood stork	<i>Mycteria americana</i>	--	--	--	E	E
		Florida black bear	<i>Ursus americanus floridanus</i>	--	--	--	SAT	T
		Little blue heron	<i>Egretta caerulea</i>	--	--	--	--	SSC
		Snowy egret	<i>Egretta thula</i>	--	--	--	--	SSC
		Tricolored heron	<i>Egretta tricolor</i>	--	--	--	--	SSC
641	Freshwater Marsh	American alligator	<i>Alligator mississippiensis</i>	--	--	--	SAT	SSC
		Everglades mink	<i>Mustela vison evergladensis</i>	--	--	--	--	T
		Florida sandhill crane	<i>Grus canadensis pratensis</i>	--	--	--	--	T
		Limpkin	<i>Aramus quarauna</i>	--	--	--	--	SSC
		Little blue heron	<i>Egretta caerulea</i>	--	--	--	--	SSC
		Snail kite	<i>Rostrhamus sociabilis</i>	--	--	--	E	E
		Snowy egret	<i>Egretta thula</i>	--	--	--	--	SSC
		Tricolored heron	<i>Egretta tricolor</i>	--	--	--	--	SSC
740	Disturbed Lands	Gopher tortoise	<i>Gopherus polyphemus</i>	--	--	--	T	T
743	Spoil Area	Gopher tortoise	<i>Gopherus polyphemus</i>	--	--	--	T	T
814	Trail	N/A	--	--	--	--	--	--
832	Electrical Power Lines	N/A	--	--	--	--	--	--

C = Commercially Exploited, SAT = Similarity of Appearance Threatened, SSC = Species of Special Concern, T = Threatened, E = Endangered

Table designates listed species with potential to occur in each FLUCFCS community.

EXHIBIT A

Project Location Map



DRAWN BY:	DATE:	CATEGORY
BWS	6/12/24	LOCATION
JOB NUMBER		SCALE:
		NTS
S/T/R		COUNTY
18/43S/26E		LEE

Singletary Property @
18200 State Road 31
Location Map



EXHIBIT B

FLUCFCS Map with Aerial

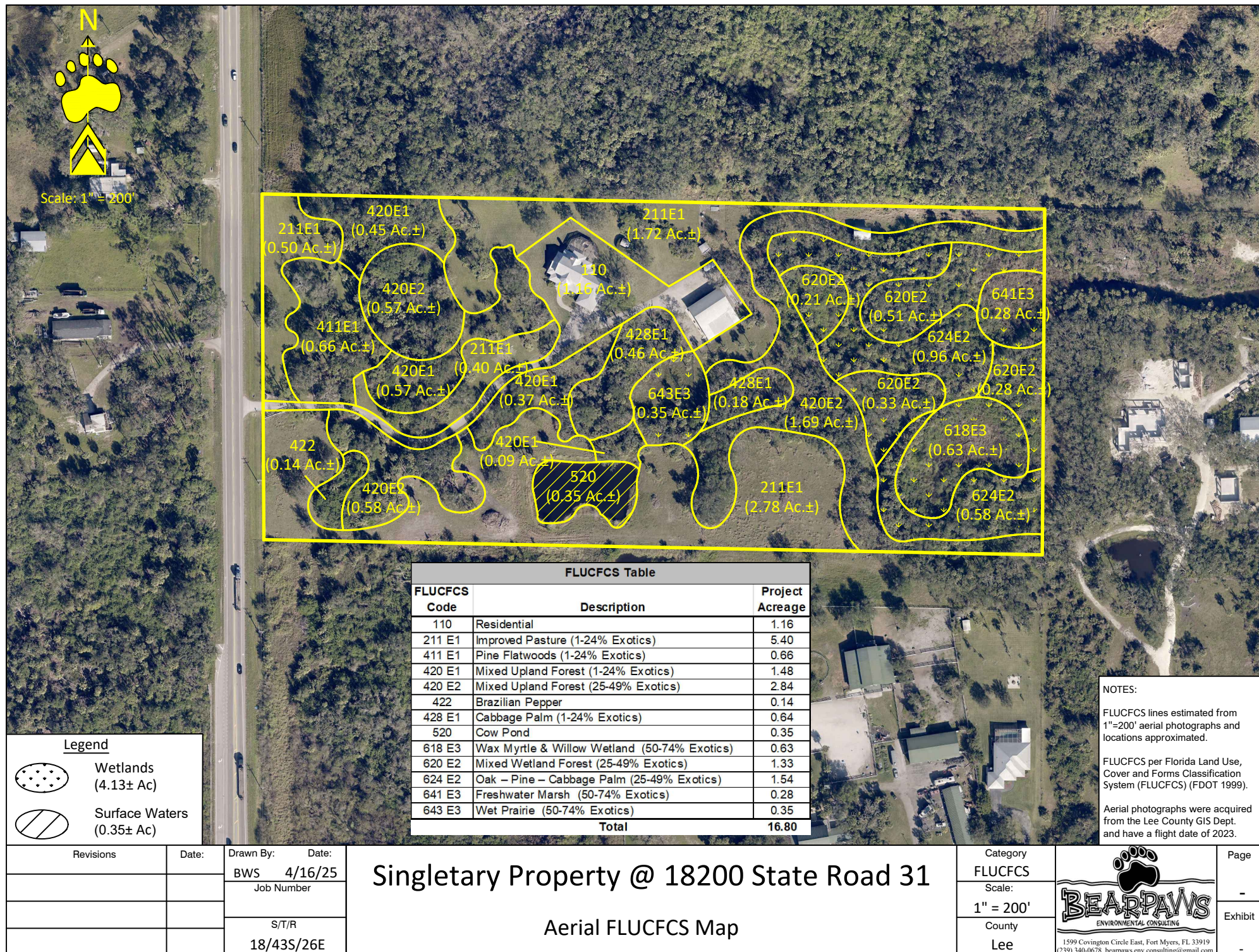
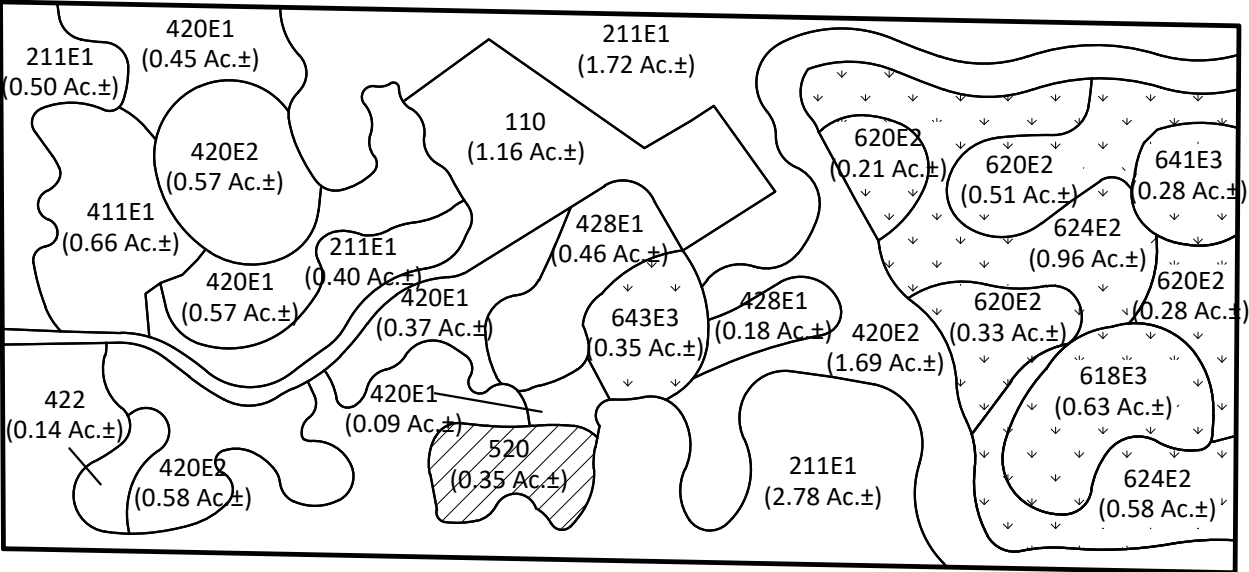


EXHIBIT C

FLUCFCS Map



Scale: 1" = 200'



FLUCFCS Table		
FLUCFCS Code	Description	Project Acreage
110	Residential	1.16
211 E1	Improved Pasture (1-24% Exotics)	5.40
411 E1	Pine Flatwoods (1-24% Exotics)	0.66
420 E1	Mixed Upland Forest (1-24% Exotics)	1.48
420 E2	Mixed Upland Forest (25-49% Exotics)	2.84
422	Brazilian Pepper	0.14
428 E1	Cabbage Palm (1-24% Exotics)	0.64
520	Cow Pond	0.35
618 E3	Wax Myrtle & Willow Wetland (50-74% Exotics)	0.63
620 E2	Mixed Wetland Forest (25-49% Exotics)	1.33
624 E2	Oak – Pine – Cabbage Palm (25-49% Exotics)	1.54
641 E3	Freshwater Marsh (50-74% Exotics)	0.28
643 E3	Wet Prairie (50-74% Exotics)	0.35
Total		16.80

Legend

-  Wetlands
(4.13± Ac)
-  Surface Waters
(0.35± Ac)

NOTES:

FLUCFCS lines estimated from 1"=200' aerial photographs and locations approximated.

FLUCFCS per Florida Land Use, Cover and Forms Classification System (FLUCFCS) (FDOT 1999).

Singletary Property @ 18200 State Road 31

FLUCFCS Map

Revisions	Date:	Drawn By:	Date:
		BWS	6/12/24
		Job Number	
		S/T/R	
		18/43S/26E	

Category	FLUCFCS		Page
Scale:	1" = 200'		-
County	Lee		Exhibit
			-

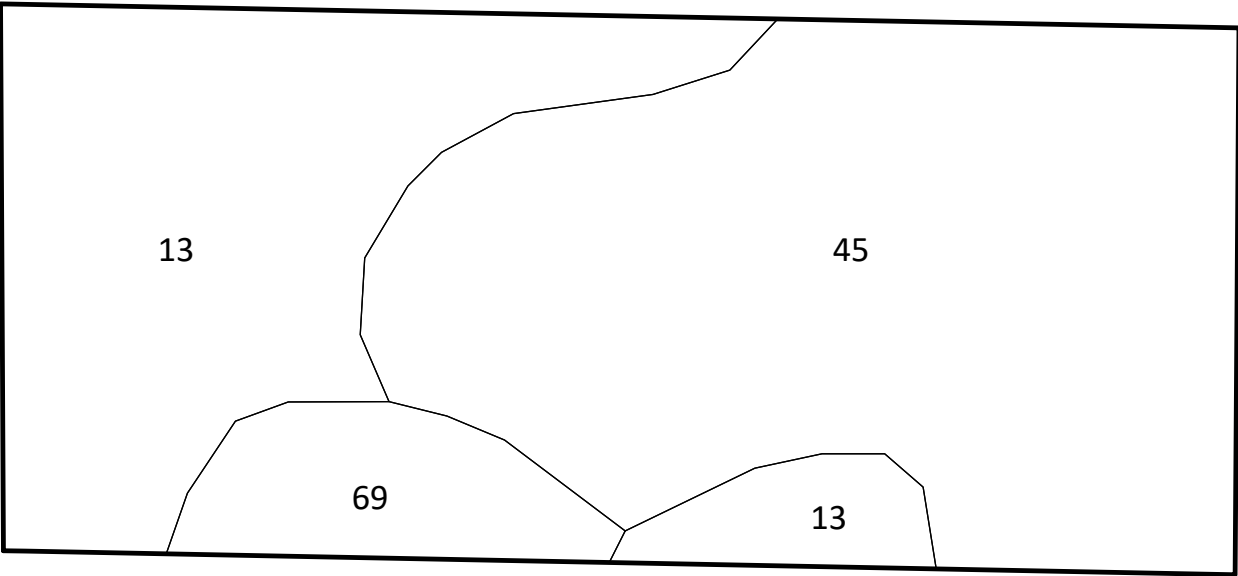
1599 Covington Circle East Fort Myers, FL 33919
(239) 340-0678 bearpaws.env.consulting@gmail.com

EXHIBIT D

NRCS Soils Map



Scale: 1" = 200'



NRCS Soils Table		
Soils No.	Name	Hydric
13	Boca Fine Sand	No
45	Copeland Sandy Loam, Depressional	Yes
69	Matlacha Gravelly Fine Sand	No

NOTES

Soils were acquired from LABINS and are from the NRCS.

Singletary Property @ 18200 State Road 31
Soils Map

Revisions	Date:	Drawn By: BWS	Date: 6/12/24
		Job Number	
		S/T/R	
		18/43S/26E	

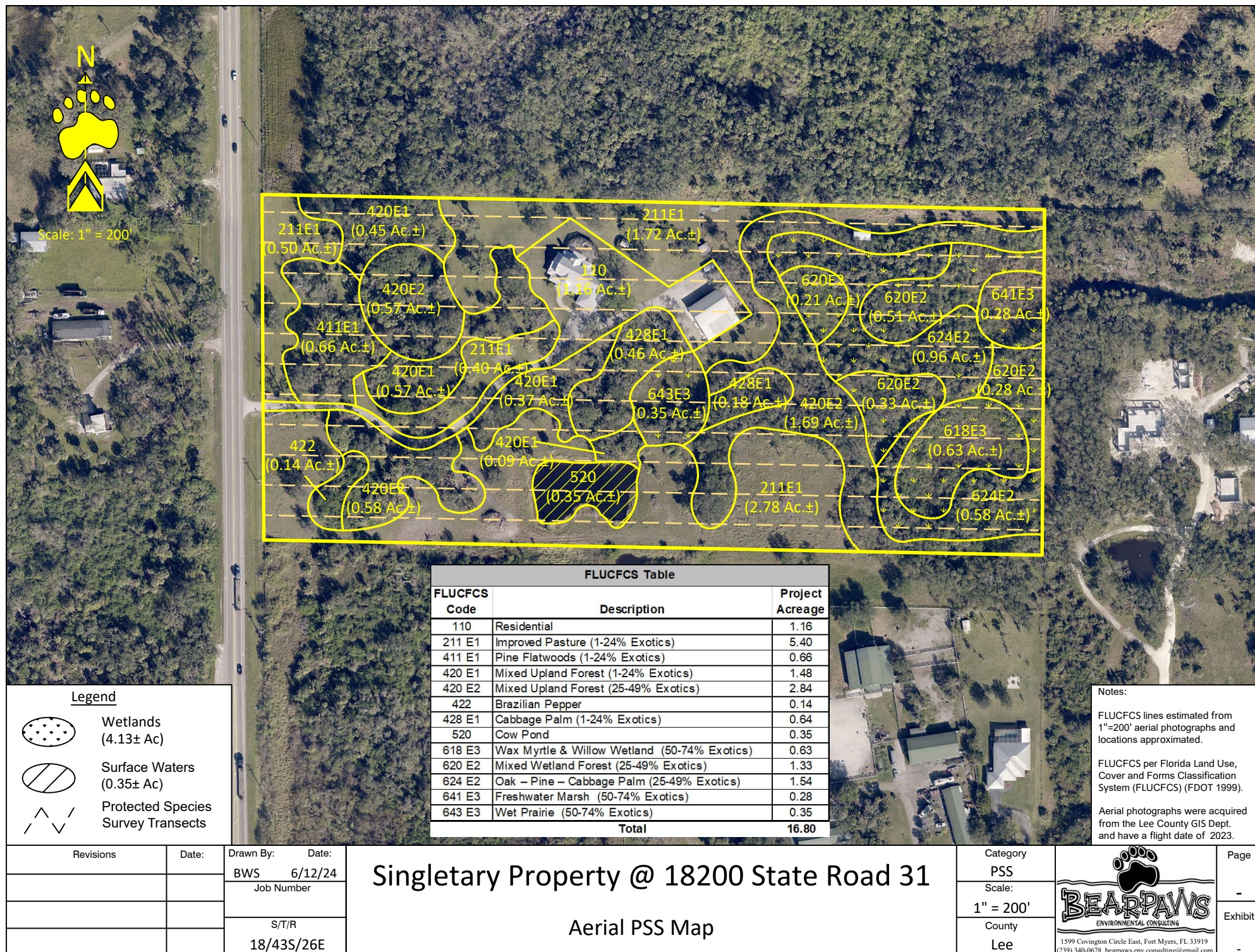
Category	Soils
Scale:	1" = 200'
County	Lee

1599 Covington Circle East, Fort Myers, FL 33919
(239) 340-0678 bearpaws.env.consulting@gmail.com

Page	-
Exhibit	-

EXHIBIT E

Protected Species Survey Map



Water Quality Monitoring Plan

Singletary Commercial Planned Development DCI2024-00043



PREPARED FOR:

**SAGE ENTITLEMENTS, LLC
97 NICKAJACK NORTH
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JULY 2025



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Water Quality Monitoring Plan

Singleetary Commercial Planned Development DCI2024-00043



JULY 2025

Handwritten signature of Michael Jessich in blue ink.

Michael Jessich
Project Manager

Handwritten signature of Veronica Buccieri in blue ink.

Roni Buccieri
Staff Scientist

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SECTION 1 INTRODUCTION AND BACKGROUND 1

SECTION 2 GOALS AND OBJECTIVES 2

SECTION 3 MONITORING SITES 3

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SECTION 5 CONTINGENCY PLAN..... 6

FIGURES

Figure 1 Regional Location Map

Figure 2 Aerial Map Showing Project Footprint

Figure 3 Pertinent Features of the Project Including Proposed Surface Water
Monitoring Site

TABLES

Table 1 Proposed Monitoring Parameters and Schedule

1.0 INTRODUCTION AND BACKGROUND

The Singletary Commercial Planned Development project is an approximately 17-acre proposed commercial development located within Section 18, Township 43 South, Range 26 East, Lee County, Florida. The Singletary Commercial Planned Development (Project) proposed development is located east of State Road 31, Lee County, Florida. **Figure 1** and **Figure 2** includes a regional location and aerial map showing the project boundaries.

The project is currently seeking approval to change the zoning category from Agricultural (AG-2) to Commercial Planned Development (CPD) for a maximum of 210,000 square feet of commercial development (DCI2024-00043). The project is proposing to outfall into a natural waterway for conveyance and ultimate discharge into an impaired waterways. This Water Quality Monitoring Plan is prepared in accordance with Lee Plan policies 125.1.2 and 125.1.4 and in response to Lee County Comment Letter dated April 23, 2025 (Natural Resources Review Comment 1).

2.0 GOALS AND OBJECTIVES

This Water Quality Monitoring Plan (WQMP) provides a response to the Lee County Comment Letter dated April 23, 2025, Comment 1 of the Natural Resources Review section regarding the proposed outflow to the natural waterway that conveys water through several properties prior to discharging into an impaired waterway (Caloosahatchee River). Specifically, the goal of this monitoring plan is to ensure that the proposed development does not introduce contaminants into impaired watersheds identified by the Florida Department of Environmental Protection. The objective of the monitoring program is to quantify the existing water quality conditions onsite and to establish actions that will be taken to improve water quality should degradation be detected through monitoring efforts. The first task to reach that objective is identification of the locations of outfalls and establishment of the water quality monitoring parameters and schedule for the program. Another objective of the monitoring plan is to provide documentation of the monitoring program results to the Lee County Division of Natural Resources (LCDNR) through regular reporting and data transfer so that the water quality database maintained by Lee County can more accurately identify and characterize any contribution of contaminants to the Waters of State of Florida.

The Water Quality Monitoring Plan will be initiated to establish baseline conditions for the project site and to quantify potential impacts of the proposed commercial development. The Water Quality Monitoring Plan includes sampling locations, sampling frequency, reporting requirements, evaluations of the water quality within the project site, and a contingency plan.

The project will include a stormwater management lake that is hydraulically connected to the Water Table Aquifer. The proposed irrigation system will consist of stormwater harvesting from the stormwater management system with these withdrawals re-supplied by groundwater. The proposed source of groundwater to supplement lake withdrawals will be fresh to mildly brackish groundwater from the Sandstone Aquifer. Actual percentages of lake and groundwater withdrawals will be determined during the water use permitting process with the South Florida Water Management District (SFWMD). However, the combination of any use of mildly brackish groundwater and fresh stormwater will maintain a chloride level of less than 200 mg/l in compliance with SFWMD policy, and which will meet all applicable permitting criteria prior to withdrawals.

3.0 MONITORING SITES

The existing topography of the project site generally directs stormwater runoff from the north to the southeast to natural low-lying wetland preserves areas onsite. Development plans for the project include two proposed Master Concept Plans (Options) which indicate the stormwater drainage plan for a single proposed outfall control structure where water can flow out of the proposed stormwater management system and leave the project site.

The approximate location of the outfall control structure (CS-1) is identified in **Figure 3**. Flow leaving the proposed lake system from CS-1 will ultimately discharge to the east of the project through undetermined flow paths/sheet flow for outfall into a natural waterway that conveys water through several properties beyond the project boundary and ultimately discharges to the Caloosahatchee River and/or associated tributaries.

The proposed Water Quality Monitoring Plan includes the installation of a shallow piezometer downgradient of the outfall structure CS-1 to record stage elevations and obtain surface water samples, respectively. Sampling at CS-1 is proposed at the downstream end of the outfall structure. The piezometers will be equipped with electronic water level transducers set to record water levels every 24 hours. The water level elevations will be referenced to the North American Vertical Datum of 1988 (NAVD 88). Proposed sampling locations at the individual control structures, CS-1 are shown in **Figure 3** for the respective Master Concept Plan option proposed.

4.0 PARAMETERS AND REPORTING SCHEDULE

The proposed monitoring parameter list is provided in **Table 1**. Monitoring includes a baseline sampling event prior to construction commencement followed by semi-annual events. The semi-annual sampling events are proposed to occur twice per year during the wet season (June through October). The early wet season monitoring event is proposed to occur in June while the late wet season event is proposed to occur in October. The monitoring will include stage measurements using previously established benchmarks (piezometers) and the discharge condition will be recorded as either a “yes or no” depending on whether water is flowing through the control structures at the time of sampling.

Table 1. Proposed Monitoring Parameters and Schedule

Surface Water Monitoring Parameter	Minimum Detection Level (MDL)	Units	Analysis Type
Discharge Condition	NA	Yes or No	Field
Stage	0.01	Feet (NAVD)	Field
Turbidity	0.01	NTU	Field
Specific Conductance	2	umhos/cm	Field
pH	0.01	S.U.	Field
Dissolved Oxygen	0.1	mg/L	Field
Temperature	0.1	C	Field
Total Kjeldahl Nitrogen (TKN)	0.1	mg/L	Laboratory
Total Nitrogen	0.1	mg/L	Laboratory
Chlorophyll A	1.0	mg/m ³	Laboratory
Nitrite	0.01	mg/L	Laboratory
Nitrate	0.01	mg/L	Laboratory
Total Phosphorus	0.05	mg/L	Laboratory
Hardness (as CaCO ₃)	N/A	mg/L	Laboratory
Chloride	1.0	mg/L	Laboratory
Iron	0.20	mg/L	Laboratory
Copper	1.0	µg/L	Laboratory

Quality Assurance

Water samples will be collected and handled following protocols contained in Florida Department of Environmental Protection (FDEP) Quality Assurance Rule F.A.C. 62-160 and adopted as the 2014 FDEP Standard Operating Procedures for Field Activities (DEP-SOP-001/01), effective April 16, 2018, or as updated. Water Quality samples will be collected at surface water monitoring stations shown in **Figure 3**. One field blank and a field duplicate will be collected during each sampling event for quality assurance purposes. A chain of custody form(s) and laboratory analysis reports will be provided in corresponding annual reports.

Water samples will be tested by a certified laboratory under the National Environmental Laboratory Accreditation Program (NELAP) using approved test methods and QA testing requirements (i.e., blanks, sample duplicates, surrogates, matrix spikes etc.) as contained in F.A.C 62-160 QA Rules.

Water Monitoring Reporting and Analysis

An annual report which will include a comparison of State water quality standards, plots of parameters, and any conclusions or recommendations will be provided to the Division of Natural Resources annually for at least 5 years. The monitoring reports will be submitted once per year (or dependent upon priority of concerning data and/or incidents), as an Electric Data Deliverable (EDD) in a comma delimited text format approved by the Lee County Division of Natural Resources in their approved format within 60 days of receipt of laboratory reports from two wet season monitoring events during the reporting period. The reports will include a continuous hydrograph of the recorded water leve6s and updated tables of the semi-annual water quality sampling results. Conclusions and recommendations will be based on applicable target levels, statistical analyses, and trends of measured constituents.

Results of surface water sampling will be compared to applicable State Water Quality Standards based on F.A.C. Chapter 62-302.530, if listed and deviation from the initial baseline sampling will be analyzed for potential negative impacts and corrected if necessary. Parameters that do not have numeric target levels will be evaluated for trends. The surface water laboratory results will undergo statistical analysis for the development of conclusions and recommendations within the annual reports.

Water Quality Monitoring will continue for a minimum of 5 years from the date of completion of the stormwater management system. After 5 years of meeting or exceeding state water quality monitoring standards, the developer may amend or discontinue water quality monitoring and reporting after written requests, review, and approval by Lee County Division of Natural Resources.

5.0 CONTINGENCY PLAN

Should indications of water levels or water quality concerns be identified by exceedances of target levels, deviations from baselines, or through statistical trend analyses, site conditions will be reviewed for possible onsite and offsite incidents that could be attributed to elevated readings. If no incident or cause can be identified, the samples will be re-collected and re-analyzed for the parameter of concern. Following any re-sampling event, the Applicant will coordinate with the LCDNR to aid in identifying potential causes and potential needs to modify monitoring parameters, frequency, and/or reporting. If resampling shows water quality concerns, Lee County will be notified to discuss potential corrective actions.

Potential investigative and corrective actions may include:

- Review potential nearest upgradient facility lakes
- Review and revision of lake management, stormwater management, and landscape fertilizer application procedures and schedules
- Include additional surface water sampling sites
- Notification to impacted residents and applicable authorities as needed

In the unforeseen event that any significant surface and/or groundwater impacts are identified as a result of a hydrocarbon spill or pesticide/herbicide application at the subject property, the Developer or designee will notify the Director of the Lee County Natural Resources Division within no more than 12 hours (or next business day). If a spill or release “presents an immediate threat to human health and/or the environment” then the FDEP Office of Emergency Response (OER) will be contacted within 24 hours. Guidance outlining the definition of a release as well as reporting procedures is presented in the OEW webpage located at: http://www.dep.state.fl.us/per/reportable_incident.htm.

The Developer or their successor(s) will coordinate contamination assessment and remediation efforts with Lee County and will comply with applicable local, state, and federal permitting requirements. The initial phase of the remediation plan will consider the actions outlined in Section 4 and may consist of additional temporary monitoring wells installed to the short-term temporal monitoring or potential subsurface impacts and to evaluate the horizontal and the vertical distribution of the impacted area. Based on the findings of the initial phase, if necessary, a more comprehensive assessment may be required.

FIGURES

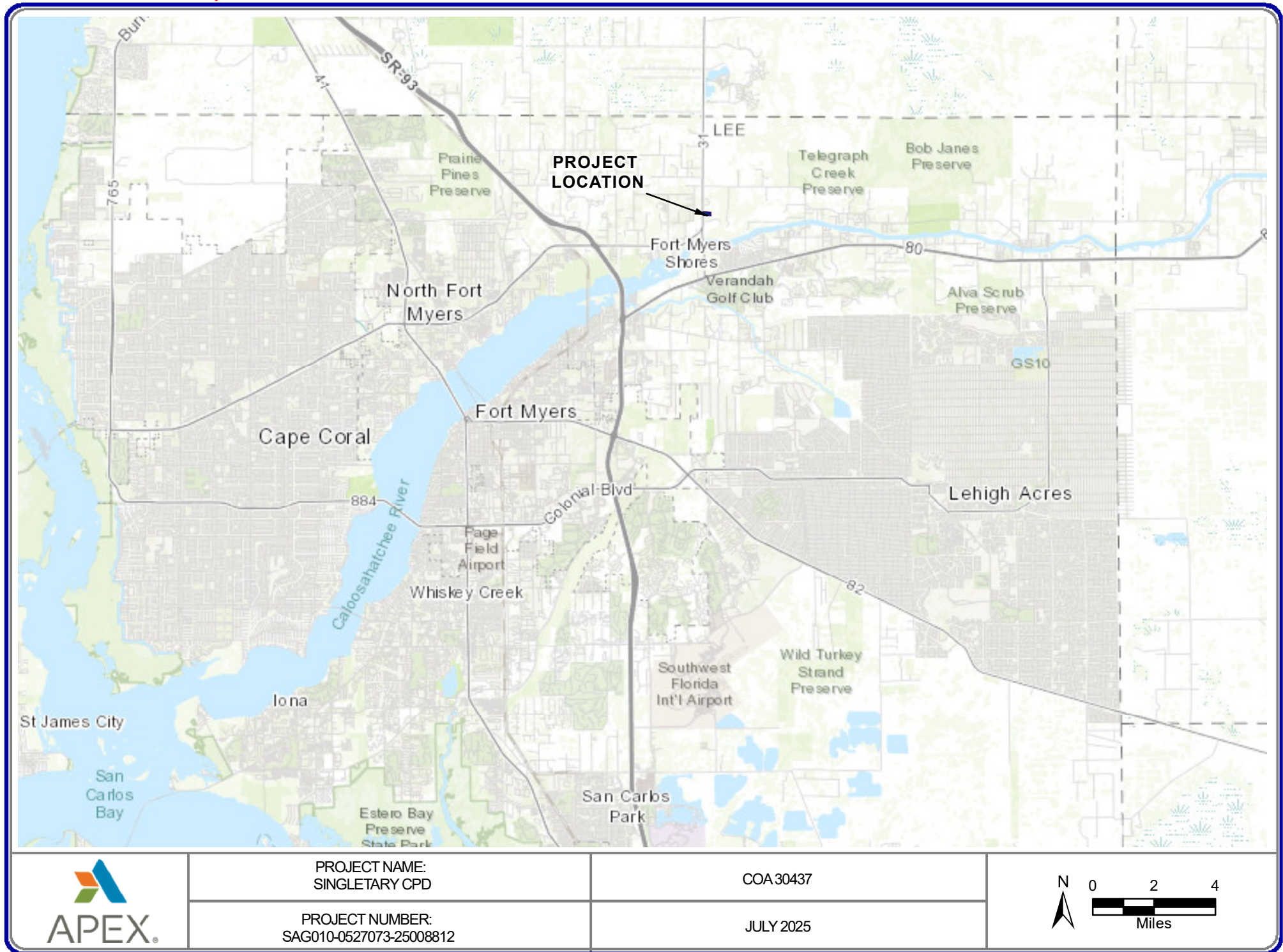
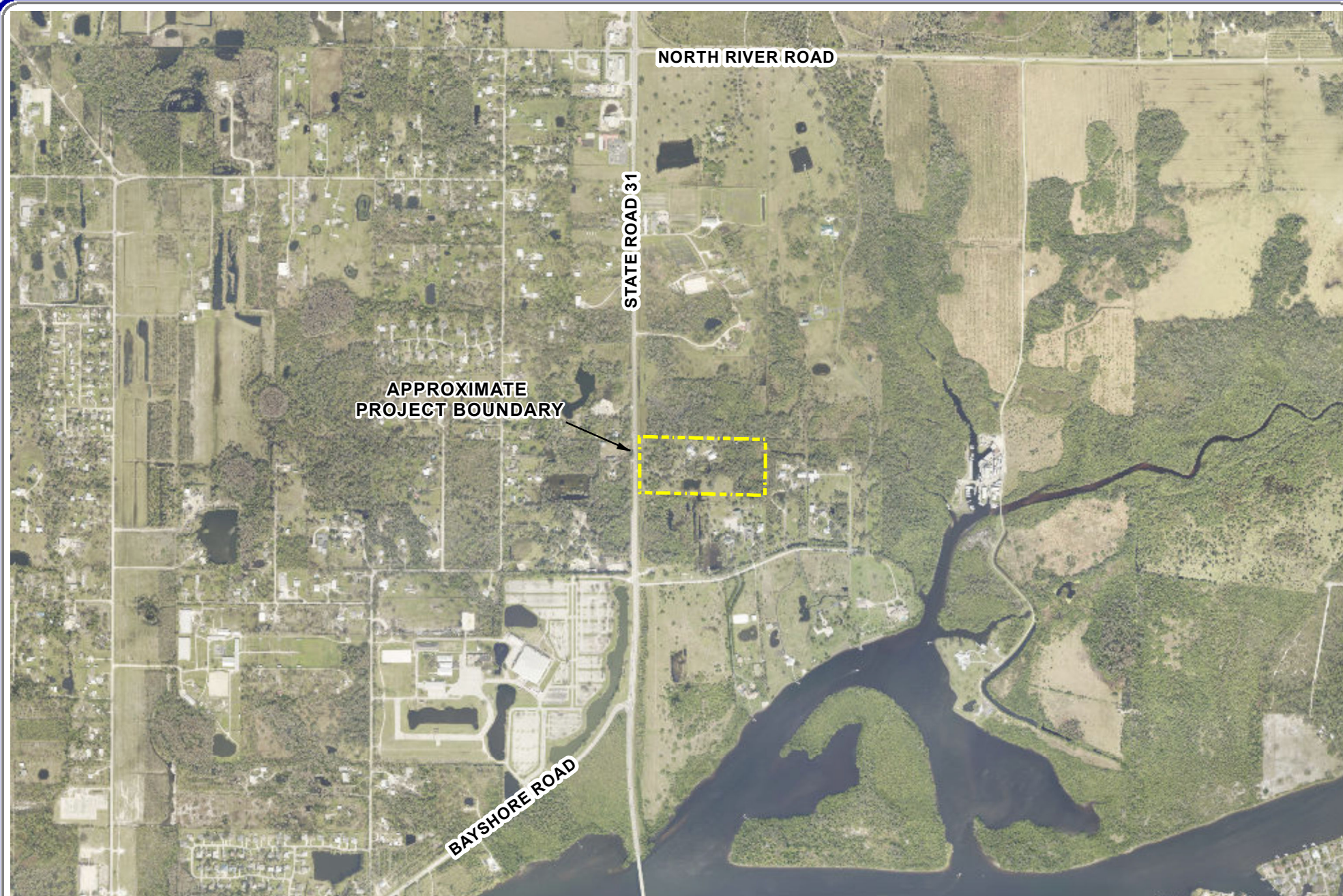


FIGURE 1. REGIONAL LOCATION MAP



PROJECT NAME:
SINGLETARY CPD

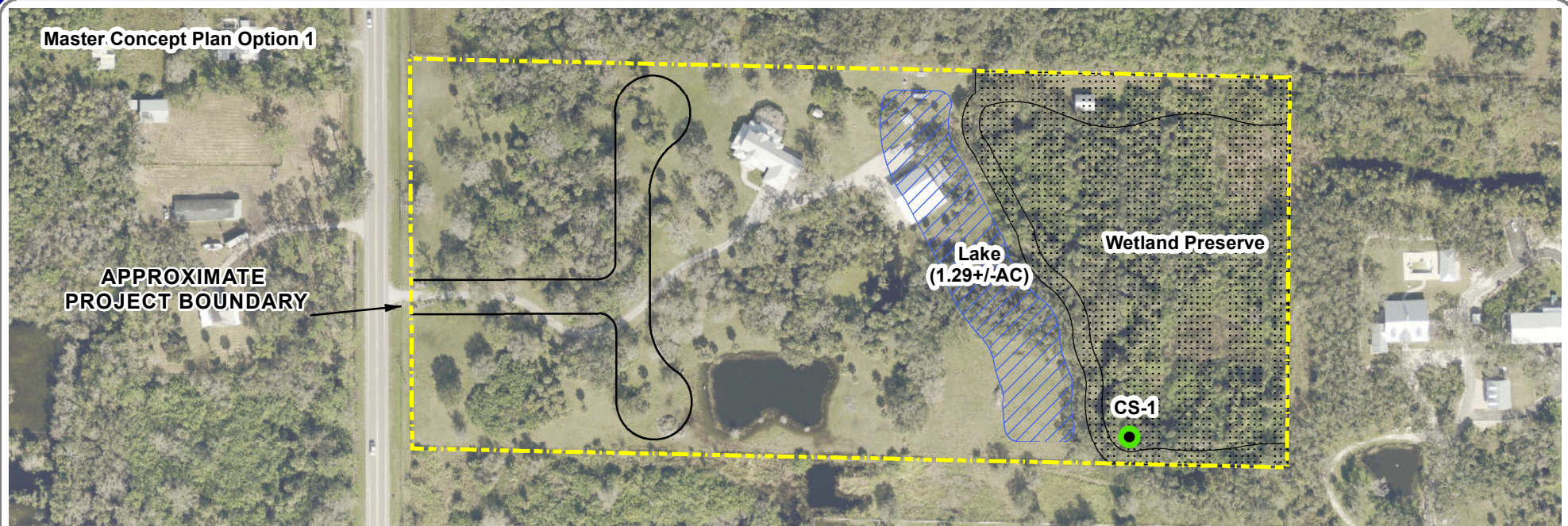
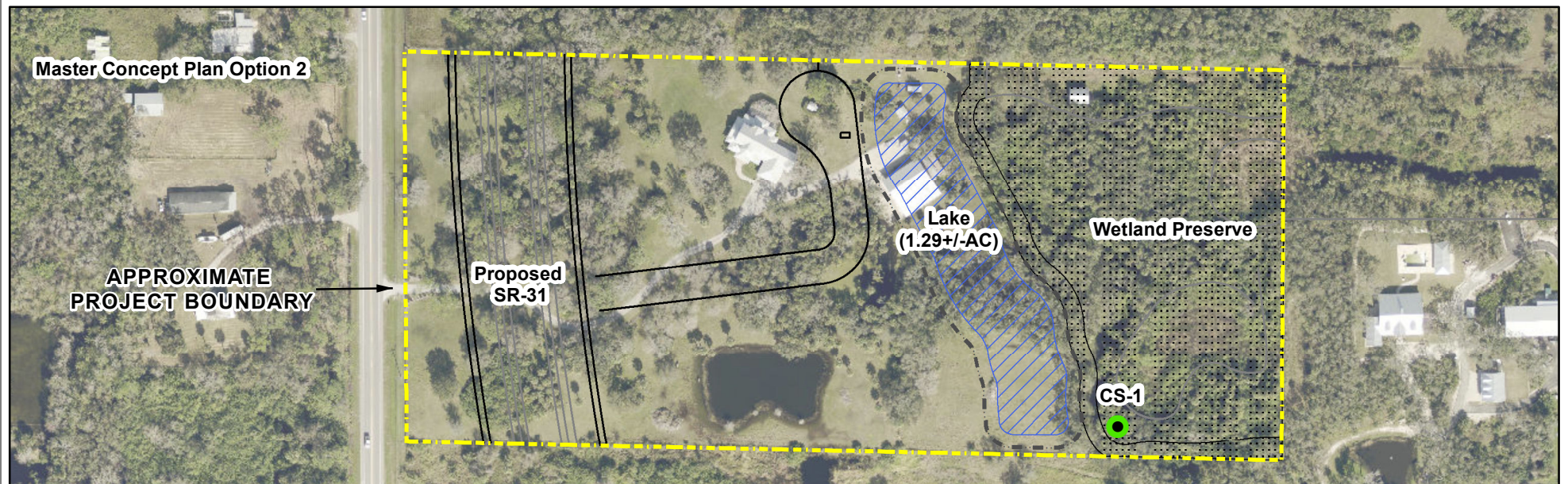
COA 30437

PROJECT NUMBER:
SAG010-0527073-25008812

JULY 2025



FIGURE 2. AERIAL MAP SHOWING PROJECT FOOTPRINT



PROJECT NAME:
SINGLETARY CPD

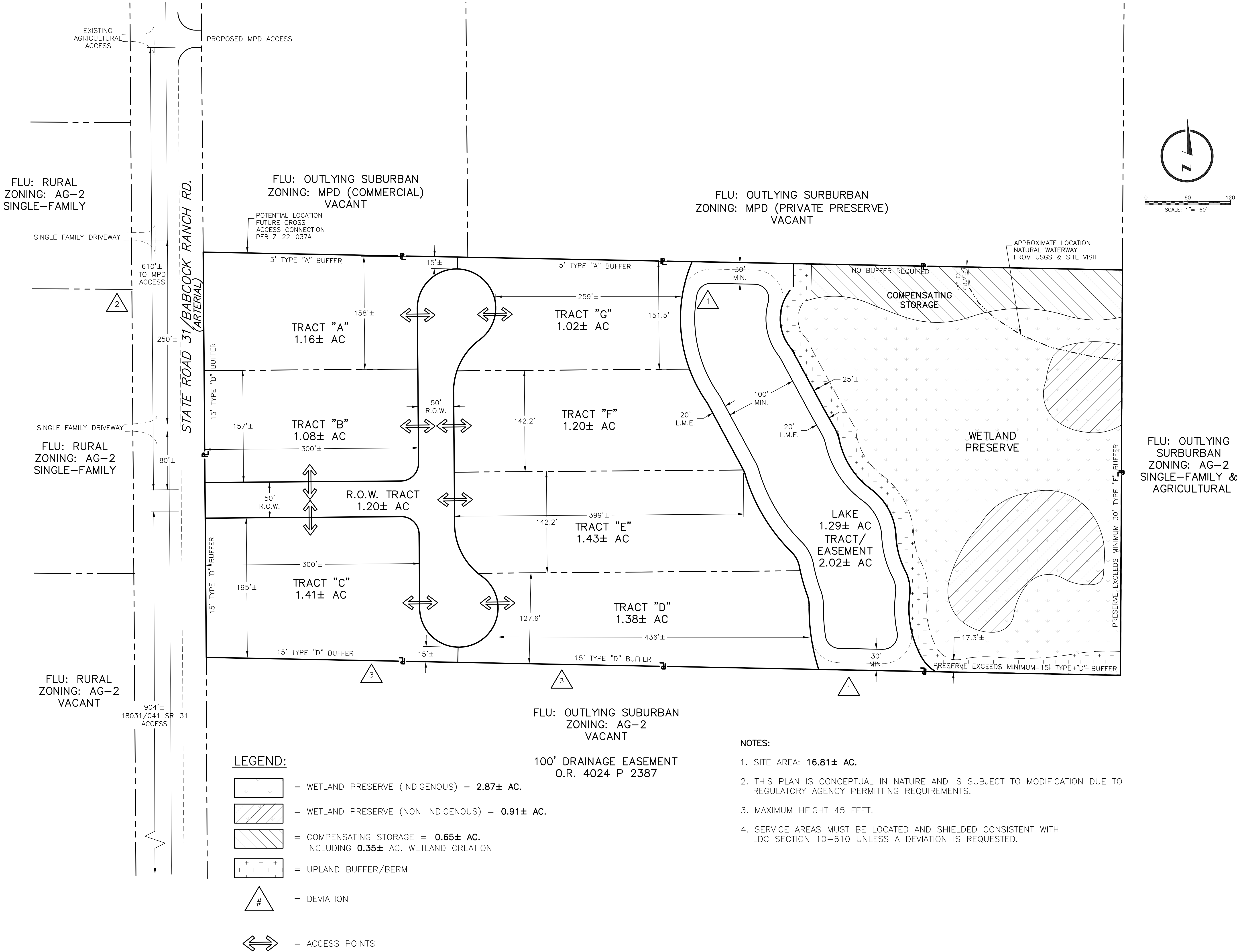
COA 30437

PROJECT NUMBER:
SAG010-0527073-25008812

JULY 2025



FIGURE 3. PERTINENT FEATURES OF THE PROJECT INCLUDING PROPOSED SURFACE WATER MONITORING SITE



866.850.4200 www.atwell-group.com
10511 SIX MILE CYPRESS PKWY, SUITE 101
FORY MYERS, FL 33966
239.939.6490

MASTER CONCEPT PLAN - OPTION #1

SINGLETARY CPD

LEE COUNTY, FLORIDA

PREPARED FOR: STEVE SINGLETARY

NO.	DATE	REVISION DESCRIPTION	BY
1	3/1/2025	1st SUFFICIENCY	SEH

Know what's below.
Call before you dig.

ALL UTILITIES ARE SHOWN BASED ON THE INFORMATION AVAILABLE TO THE ENGINEER. THERE IS NO GUARANTEE ALL UTILITIES ARE SHOWN OR THAT THE LOCATION, DEPTH, AND SIZE OF EACH FACILITY IS CORRECT. THE CONTRACTOR IS RESPONSIBLE FOR LOCATING ALL UTILITIES AND SERVICE LINES PRIOR TO CONSTRUCTION.

DRAFTED BY:	DESIGNED BY:	REVIEWED BY:
JLS	TRL	SEH

PROJECT NUMBER:	COMPLETION DATE:	SURVEY DATUM:
24003215	10/28/2024	

BOOK AND PAGE:

SHEET

1 of 2

FLU: RURAL
ZONING: AG-2
SINGLE-FAMILY

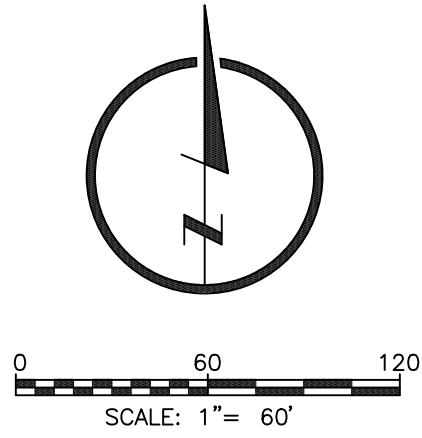
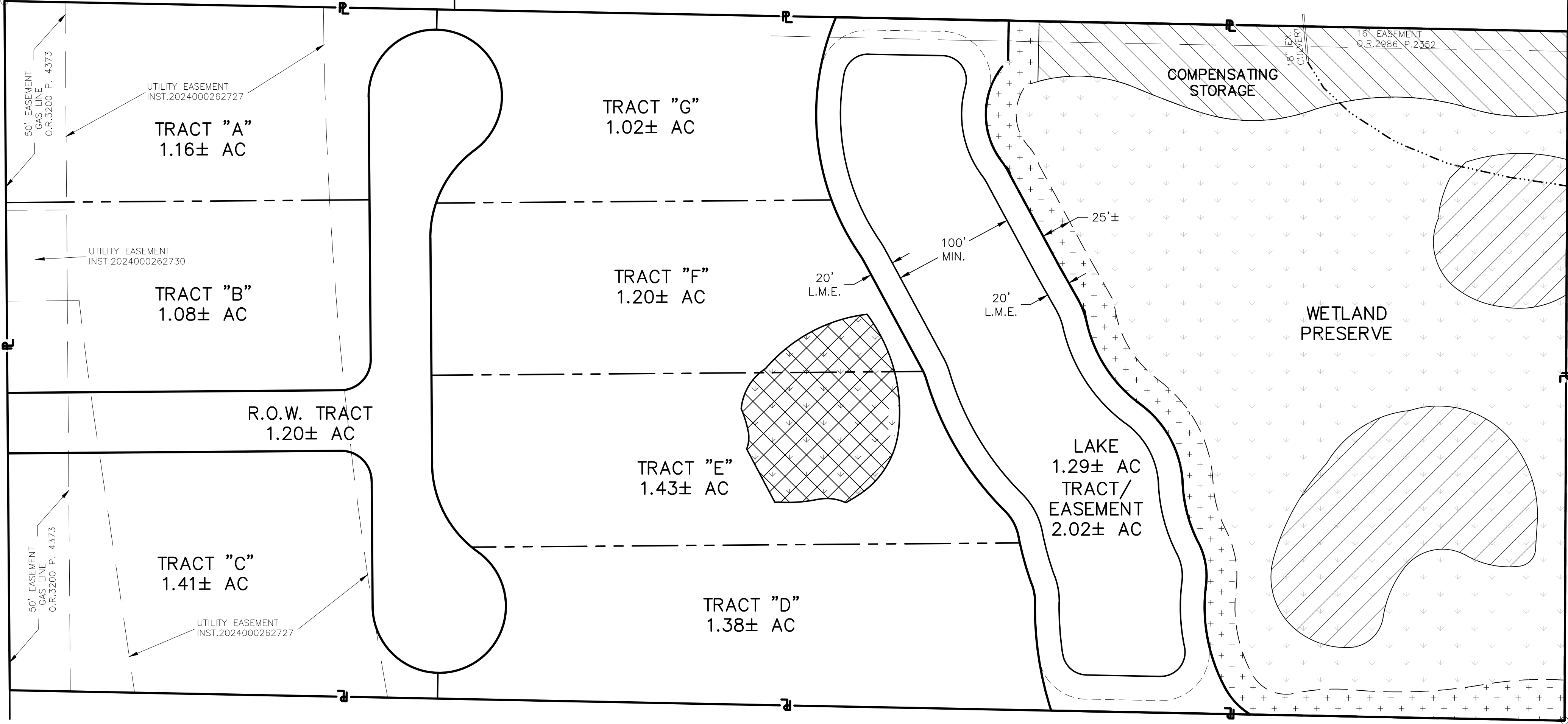
FLU: RURAL
ZONING: AG-2
SINGLE-FAMILY

FLU: RURAL
ZONING: AG-2
VACANT

STATE ROAD 31/BABCOCK RANCH RD.
(ARTERIAL)

FLU: OUTLYING SUBURBAN
ZONING: MPD (COMMERCIAL)
VACANT

FLU: OUTLYING SURBURBAN
ZONING: MPD (PRIVATE PRESERVE)
VACANT



FLU: OUTLYING
SURBURBAN
ZONING: AG-2
SINGLE-FAMILY &
AGRICULTURAL

LEGEND:

- = WETLAND PRESERVE (INDIGENOUS) = 2.87± AC.
- = WETLAND PRESERVE (NON INDIGENOUS) = 0.91± AC.
- = COMPENSATING STORAGE = 0.65± AC.
INCLUDING 0.35± AC. WETLAND CREATION
- = UPLAND BUFFER/BERM
- = WETLAND IMPACT = 0.35± AC.

FLU: OUTLYING SUBURBAN
ZONING: AG-2
VACANT

100' DRAINAGE EASEMENT
O.R. 4024 P 2387

OPEN SPACE TABLE

OPEN SPACE REQUIRED: 30% OF 16.81± AC. OR 5.04± AC
(10% MIN. OPEN SPACE ON EACH PARCEL/TRACT)

INDIGENOUS REQUIRED: 50% OF OPEN SPACE OR 2.52± AC

INDIGENOUS PROVIDED: 2.87± AC.

NON-INDIGENOUS PRESERVE 0.91± AC.
COMPENSATING STORAGE = 0.65± AC.
OTHER OPEN SPACE PROVIDED (LAKE, BUFFERS ETC.) MINIMUM 0.61 AC.

TOTAL OPEN SPACE PROVIDED: MINIMUM 5.04 AC.



OPEN SPACE & EASEMENT EXHIBIT - OPTION #1

SINGLETARY CPD

LEE COUNTY, FLORIDA

STEVE SINGLETARY

PREPARED FOR:

NO.	DATE	REVISION DESCRIPTION	BY
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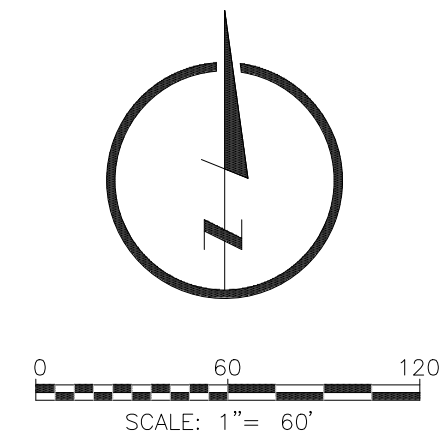


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PROJECT NUMBER: 24003215	COMPLETION DATE: 3/1/2025	SURVEY DATUM:
BOOK AND PAGE:		

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FLU: OUTLYING
SURBURBAN
ZONING: AG-2
SINGLE-FAMILY &
AGRICULTURAL

MASTER CONCEPT PLAN - OPTION #2

SINGLETARY CPD

LEE COUNTY, FLORIDA

STEVE SINGLETARY

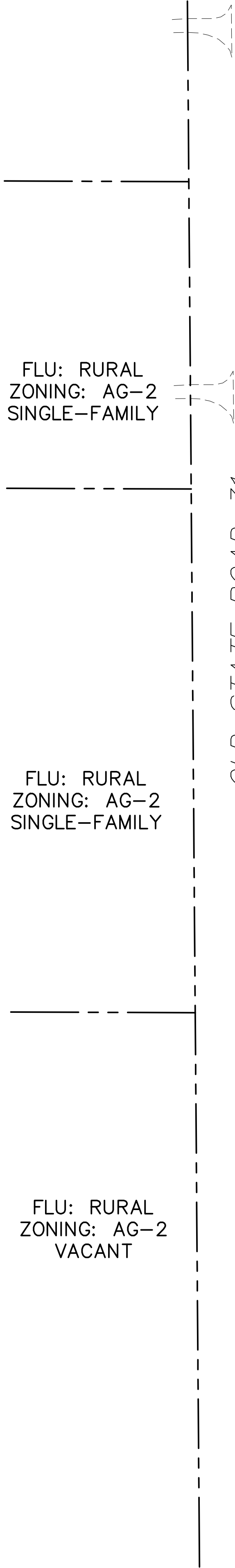
NO.	DATE	REVISION DESCRIPTION	BY
1	3/1/2025	1st SUFFICIENCY	SEH



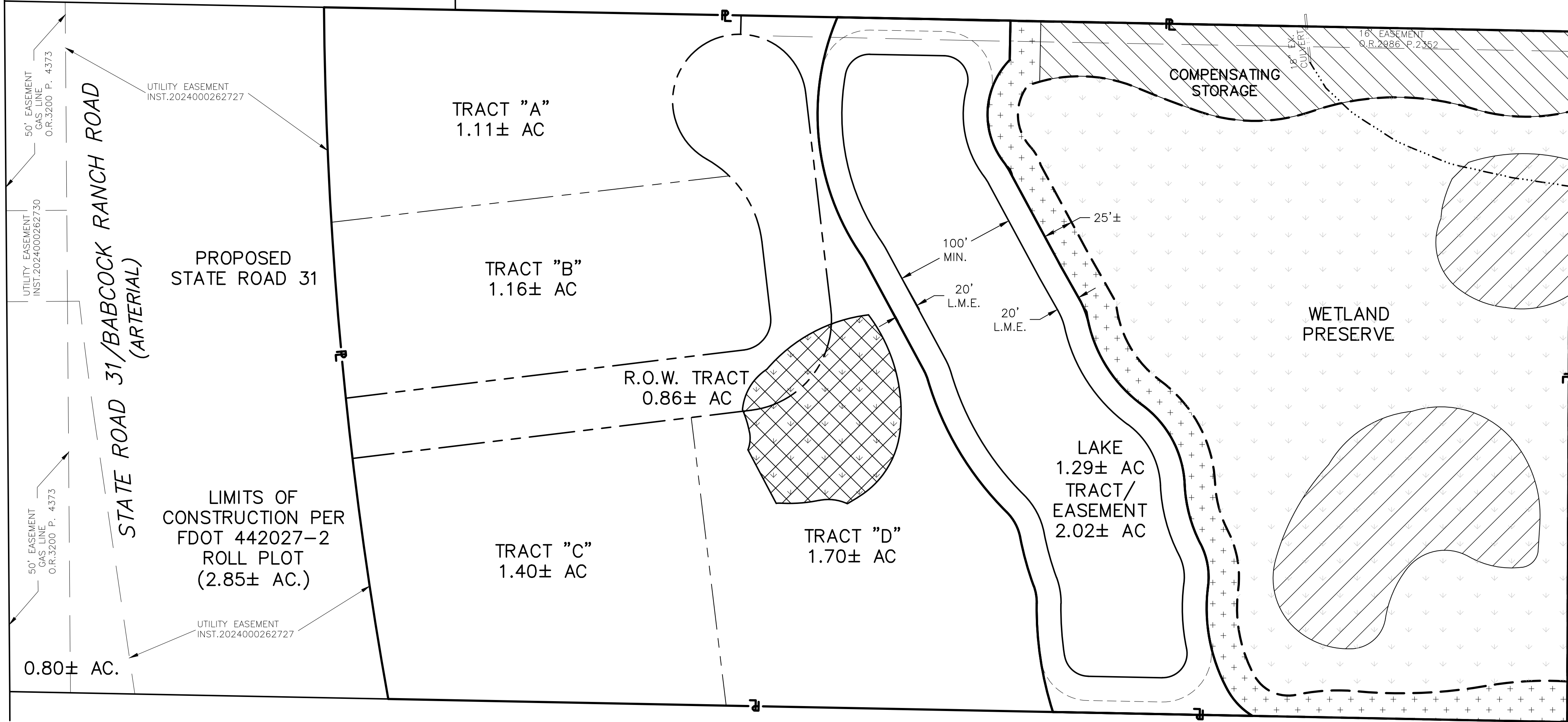
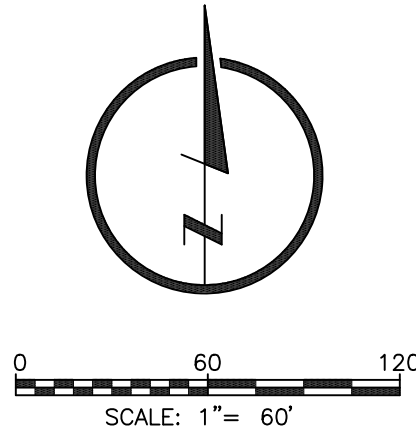
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SHEET		



OLD STATE ROAD 31



LEGEND:

- [Symbol] = WETLAND PRESERVE (INDIGENOUS) = 2.87± AC.
- [Symbol] = WETLAND PRESERVE (NON INDIGENOUS) = 0.91± AC.
- [Symbol] = COMPENSATING STORAGE = 0.65± AC. INCLUDING 0.35± AC. WETLAND CREATION
- [Symbol] = UPLAND BUFFER/BERM
- [Symbol] = WETLAND IMPACT = 0.35± AC.

FLU: OUTLYING SUBURBAN ZONING: AG-2 VACANT
100' DRAINAGE EASEMENT
O.R. 4024 P 2387

OPEN SPACE TABLE

OPEN SPACE REQUIRED: 30% OF 13.16± AC. OR 3.95± AC.
(10% MIN. OPEN SPACE ON EACH PARCEL/TRACT)

INDIGENOUS REQUIRED: 50% OF OPEN SPACE OR 1.98± AC

INDIGENOUS PROVIDED: 2.87± AC.

NON-INDIGENOUS PRESERVE: 0.91± AC.
COMPENSATING STORAGE: 0.65± AC.
TOTAL OPEN SPACE PROVIDED: MINIMUM 3.95 AC.



OPEN SPACE & EASEMENT EXHIBIT - OPTION #2

SINGLETARY CPD

LEE COUNTY, FLORIDA

STEVE SINGLETARY

PREPARED FOR:

NO.	DATE	REVISION DESCRIPTION	BY
1	3/1/2025	1st SUFFICIENCY	SEH



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DRAFTED BY: JLS	DESIGNED BY: TRL	REVIEWED BY: SEH
PROJECT NUMBER: 24003215	COMPLETION DATE: 3/1/2025	SURVEY DATUM:
BOOK AND PAGE:		

SHEET