



April 19, 2018

Mr. Craig Brown
Senior Environmental Specialist
Collier County Development Review Division
2800 North Horseshoe Drive
Naples, FL. 34104

**Subject: Ave Maria SRAA (Appl. No. PL20180003069)
Environmental Support**

Dear Mr. Brown,

As a brief summary of the environmental component of the Ave Maria SRAA proposal: the acreage of the proposed addition of land to the SRA equals the acreage of the proposed reduction of land from the SRA; no NRI scores of 1.2 or greater fall within the addition or reduction lands; the proposed land use (residential) is the same for the addition and reduction lands; both addition and reduction lands are mapped as Open lands in the RLSA overlay; no FSA, HSA, WRA, or Conservation lands fall within the addition or reduction lands; no FSA, HSA, or Conservation lands are located adjacent to, or within 300' of the addition or reduction lands; and the lands proposed to be removed from the SRA have higher NRI values than the lands proposed to be added to the SRA.

Per our phone discussion on 16 April 2019, following are the SRA Designation Checklist items requested during pre-application consultation in italics, and responses are in bold.

SRA Designation Sufficiency Checklist (Environmental)

1. *Provide the following Natural Resource Index Assessment and Support Documentation (LDC 4.08.07.D.3-4):*
 - a. *Calculations that quantify the number of acres by index values, the level of conservation being offered, and the resulting number of credits being generated.*

The 12.74-ac SRA addition parcel has adopted NRI scores of 0.2 (12.60 acres) and 0.4 (0.14 acres) and it retains those values based upon unchanged land uses and soil types, and the continued lack of the other environmentally sensitive resources considered in NRI scoring factors.

The 12.19-ac SRA reduction parcel had 0.06 acres of adopted NRI scores of 1.1, 0.59 acres of 1.0, 0.80 acres of 0.8, 1.33 acres of 0.5, 0.07 acres of 0.4, and 9.34 acres of 0.2. The parcel retains those values based upon unchanged land uses and soil types

and the continued lack of the other environmentally sensitive resources considered in NRI scoring factors. The 0.41 acres of improved pasture that were converted to a linear water feature share the same FLUCCS Code Group and retain the NRI score of 0.2.

The 0.55-ac SRA reduction area originally had a score of 0.4, and it currently has a score of 0.0 since the pasture that existed at SRA inception was converted to entry road and landscape features. Though the reduction in NRI value was initially the result of owner action (road entry construction), subsequent dedication of the 0.55 acres of entry road and landscape to the County essentially nullifies the owner's original RLS obligation/interest in that land. Therefore, we believe that any reduction in NRI value within the 0.55 acres of land dedicated to the County should not be held against the applicant.

There is no Conservation being offered by the proposed land exchange.

- b. The acreage of agricultural and non-agricultural lands by type being preserved.*
No land considered in this amendment is being proposed to be preserved.
- c. The acreage of all lands by type within the proposed SRA that have an index value greater than 1.2.*

Base upon prior scoring, and current NRI index assessment, no land within the proposed SRA amendment scores 1.2 or greater.

- d. All lands designated as SRA within the ACSC.*

No lands within the proposed SRA amendment fall within the ACSC.

- 2. *Provide acreage calcs. for lands being put into an SRA, including WRAs within the SRA boundary. (LDC 4.08.07.D.4.b)*

The SRA addition totals 12.74 acres, and the proposed reduction totals 12.74 ac., for no net change in SRA acreage. No WRAs are located within either the proposed addition area or the reduction areas.

- 3. *Provide a Natural Resource Index map of the area being designated as a SRA. (LDC 4.08.07.D.4.e)*

Please see the attached Adopted Natural Resources Index Values map of the proposed SRA addition and reduction areas. The NRI scores are indicated in shades of color, per the *adopted* scoring, and NRI score quantities have been added to the colored cells for ease of interpretation. The NRI value of the land being added to the SRA is less than the cumulative NRI value of the land being removed from the SRA.

- 4. *Provide a RLSA Overlay map and aerial delineating the location boundaries of the area being designated as a SRA. (LDC 4.08.07.D.4.c-d)*

Please see the attached RLSA Overlay & Aerial Photograph map.



5. *Provide a FLUCFCS map on an aerial photograph delineating the area being designated as SRA. (LDC 4.08.07.D.4.f).*

Please see the FLUCCS map, with recent aerial imagery, within the attached listed species survey memorandum.

6. *Provide a listed species occurrence map delineating the area being designated as SRA. (LDC 4.08.07.D.4.g)*

Per a listed species survey conducted in April 2019, no listed species were observed within the addition or reduction areas. See attached listed species survey memorandum.

7. *Provide the SRA Master Plan identifying all conservation/preservation lands and wetland preservation and buffer areas. Provide documentation of professional credentials of environmental consultant involved with its preparation. (LDC 4.08.07.D.5)*

The proposed SRAA includes no conservation/preservation lands or wetland preservation and buffer areas.

Please see the attached resume for the environmental consultant responsible for generating the environmental support contained in this submittal.

SRA Designation Review Checklist (Environmental)

1. *Demonstrate compliance with environmental zoning overlay requirements (i.e. ST, ACSC-ST, SRA etc) (LDC 2.03.05-2.03.08; 4.08.00)*

The proposed SRA addition falls within the Ave Maria Utility Company wellfield ST/W-4 overlay area. See attached zoning map number 8916N that has been marked up to show the approximate location of the 12.74-ac addition to the SRA and where it falls within special treatment overlay zone ST/W-4. Per overlay requirement, this ST/W-4 area has restrictions for generation/storage of hazardous products and hazardous waste. It also requires that on-site stormwater management facilities be designed in accordance with South Florida Water Management District (SFWMD) standards. The proposed SRA addition land is being proposed to provide and serve as the primary vehicular access to a proposed golf/residential community within Ave Maria. As such, there will be no generation or storage of hazardous waste within the proposed addition parcel. Additionally, the water management facilities that are proposed to be located within the SRA addition parcel will be designed to SFWMD standards during a forthcoming Environmental Resource Permit modification process. Therefore, the water resources within the wellfield ST/W-4 zone should be appropriately protected.

2. *Lands designated FSA, HSA, or SSA cannot be designated SRA. Remove any areas under this designation from the SRA boundaries. WRAs can be within the boundaries of the SRA for water management, but cannot be designated SRA. (LDC 4.08.07.A)*

There are no FSA, HSA, WRA, or SSA lands within the proposed SRA addition.



3. *Lands greater than one acre with an index value greater than 1.2 shall be retained in a natural state. (LDC 4.08.07.A.1.d)*

There are no NRI cell values equal to or exceeding a value of 1.2 within the proposed SRA addition.

4. *The master plan shall direct incompatible land uses from FSAs, HSAs, WRAs and Conservation. (LDC 4.08.07.G.1)*

There are no FSA, HSA, or WRA lands within or adjacent to the proposed SRA addition.

5. *Demonstrate how the SRA shall not encroach into an FSA or HSA. (LDC 4.08.07.A.1.g)*

There are no FSA or HSA lands within or adjacent to the proposed SRA addition.

6. *When a proposed SRA adjoins an FSA, HSA or Conservation land, the master plan shall provide a 300' open space buffer. Specify on the plan the permitted uses within the buffer. (LDC 4.08.07.J.6.d.ii)*

There are no FSA, HSA, or Conservation lands adjacent to, or within 300' of, the proposed SRA addition.

7. *When the SRA abuts the west boundary of FSAs and HSAs in Camp Keais Strand the buffer shall be 500' wide; golf course fairways and turf areas shall not be located within the first 300'. (LDC 4.08.07.J.6.d.ii)*

The proposed SRA addition does not abut the west boundary of FSAs and HSAs in Camp Keais Strand.

8. *SRA's located within the ACSC or adjoining land designated as Conservation, FSA or HSA shall be heard before the EAC. (LDC 4.08.07.F.1.a)*

The proposed SRA addition is not located within the ACSC and is not adjacent to Conservation, FSA, or HSA lands.

We trust that the environmental items listed above are sufficient for review the proposed Ave Maria SRAA. Should you have any questions, or require any additional information, please do not hesitate to contact me at 239-403-6749, or via email at blayman@barroncollier.com.

Thank you,

PENINSULA ENGINEERING

Bruce Layman, CE, PWS
Ecologist

Encl. as noted.

Cc: David Genson, PE, Barron Collier Companies