



Protecting Southwest Florida's unique natural environment and quality of life ... now and forever.

February 16, 2021

sent via email

Collier County Planning Commission
Karen Homiak, District 1
Christopher Vernon, District 2
Karl Fry, District 3
Edwin Fryer, District 4
Robert Klucik, Jr., District 5
Paul Shea, At Large Environmental
Joseph Schmitt, At Large Environmental
Thomas Eastman, School Board (non-voting)

Re: Bellmar Village SRA Application

Dear Chairman Fryer and Planning Commissioners:

On behalf of our 6,400 supporting families, the Conservancy of Southwest Florida is writing in opposition to the proposed Stewardship Receiving Area (SRA) application to create Bellmar Village. The project is inconsistent with Collier County Growth Management Plan (GMP) and Land Development Code (LDC). We request that you vote to recommend denial of the Bellmar Village SRA to the Board of County Commissioners.

Bellmar should be recommended for denial for many reasons. Among those reasons are the survival of the Florida panther, the inadequacy of the Natural Resource Index (NRI) scoring, and failure to meet the goals and objectives of the Rural Land Stewardship Area (RLSA) program.

INCONSISTENCIES WITH GOALS AND OBJECTIVES OF THE RLSA

In a Consistency Review dated May 27, 2020, Collier County staff stated on page 11:

The Bellmar Village SRA still does not fully meet the intent of the policies in the RLSAO pertaining to innovative design, compactness, housing diversity, walkability,



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mix of uses, use density/intensity continuum or gradient, interconnectedness, etc. In staff's view, this SRA is, with some exceptions, a suburban development plan typical of that in the coastal urban area placed in the RLSA and is contrary to what is intended in the RLSAO.

We agree with this assessment. Bellmar is suburban sprawl without innovation, without housing diversity, without true internal capture, and without a true village center, among other problems. Bellmar is nothing more than a typical suburban development. This is not what the RLSA is intended for, and is not how it should be used. How can the County approve a proposed development where the County's own professional staff concluded that the proposal does not meet the intent of the Growth Management Plan? Why do we even have a Growth Management Plan in Collier County if such blatant disregard for it is allowed?

But, frankly, it gets worse. Curiously, the language quoted above is **not** included in the most recent Consistency Review available through CityView dated December 4, 2020. Yet, only minor changes were made to the site plan from May to December. The curious deletion of Staff's findings should be of critical concern to the Planning Commission! Why was this finding removed from the County's review? The Planning Commission should demand an explanation. Who decided to remove this language? Why? Was the developer or its representatives involved in these discussions? Were there any instances of conflicts of interest or the appearance of conflicts? Good governance in Collier County requires that all of us understand why the County staff's conclusion was removed when nothing material in the Bellmar project was changed.

With regard to the substance, the Growth Management Plan (GMP) Policy 4.6 states that SRA characteristics shall be based upon innovative planning and development strategies referenced in Section 163.3168(2), Florida Statutes. These planning strategies and techniques include urban villages, new towns, satellite communities, area-based allocations, clustering and open space provisions, and mixed-use development that allow the conversion of rural and agricultural lands to other uses while protecting environmentally sensitive areas.

Bellmar does not conform to this standard. There is nothing innovative about suburban sprawl. Bellmar is 97.5% residential use with a small portion of multi-family units— no affordable housing is provided; and there is only a commitment to build 10% multi-family homes of the total housing units - the remaining 90% can be single family attached or detached homes. This is not a range of housing uses and is not innovative. It is not clustered and does not protect environmentally sensitive areas.

Florida Statutes address rural land stewardship areas in Section 163.3248. Section (1) states:

Rural land stewardship areas are designed to establish a long-term incentive-based strategy to balance and guide the allocation of land so as to accommodate future land uses in a manner that protects the natural environment, stimulate economic growth and diversification, and encourage the retention of land for agriculture and other traditional rural land uses.

Bellmar does not protect the natural environment and will not diversify or stimulate economic growth. Simply put, Bellmar is suburban sprawl without balance resulting in the destruction of important environmental lands while simultaneously creating burdens for transportation, water, and sewer services that will be borne by the entirety of Collier County.

The Collier County Land Development Code (LDC) provides guidance for SRA Designation in Section 4.08.07, stating:

SRA designation is intended to encourage and facilitate uses that enable economic prosperity and diversification of the economic base of the RLSA District, and encourage development that utilizes **creative** land use planning techniques and facilitates a **compact form** of development to accommodate population growth by the establishment of SRAs. (emphasis added)

There is nothing innovative or creative about Bellmar. It is a cookie cutter community like hundreds of others scattered throughout Lee and Collier County. It is not compact, it is not mixed use, it does not promote walkability. This is primarily single family suburban sprawl. There is no downtown or true village center. There is nothing that makes this proposed development any different than the hundreds of similarly designed planned unit developments outside the RLSA. This alone makes Bellmar inconsistent with the fundamental purpose and intention of the RLSA.

RLSA Policy 4.7.2 states, "Villages are comprised of residential neighborhoods and shall include a mixed-use village center to serve **as the focal point for the community's support services and facilities.**" (emphasis added)

Bellmar's Village Center is clearly not the focal point of the community as it is located nowhere near the center. Instead the Village "Center" – which is a mere 24 acres on the 1000 acres site - is located on the extreme northwestern edge of the property, alongside the future taxpayer-funded Big Cypress Parkway. The applicant is placing the commercial "center" along a future county road, presumably in the hopes of taking advantage of drive-by-traffic, instead of designing an actual village center to provide its residents with walkable access to goods and services to maximize internal capture, as is required by the Overlay. Bellmar is not innovative planning, as the RLSA requires. Bellmar is quintessential suburban-style development.

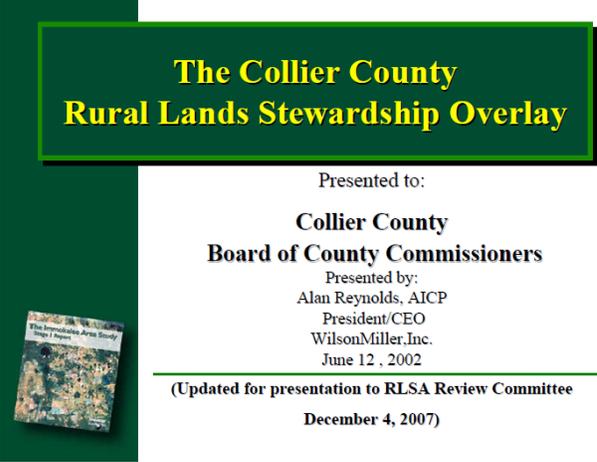
If the same type of planned developments are approved, the same type of sprawl development will occur and Collier County will get more of the same instead of meeting the requirements of the RLSA to have innovative, compact, walkable developments. We understand that the foundation of the RLSA program is a balance between development and conservation, however, that balance still must conform to the letter and requirements of the GMP and LDC. In this case, Bellmar does not meet the intent of the RLSA program.

NATURAL RESOURCE INDEX

The current Natural Resource Index (NRI) scoring system is not based on the best available science and does not adequately protect panthers, listed species, or their necessary habitat.

Policy 1.8: The natural resource value of land within the RLSA is measured by the Stewardship Natural Resource Index (Index) set forth on the Worksheet. The Index established the *relative* natural resource value by *objectively* measuring six different characteristics of land and assigning an index factor based on each characteristic. The sum of these six factors is the index value for the land. Both the characteristics used and the factors assigned thereto were established after review and analysis of detailed information about the natural resource attributes of land within the RLSA so that development could be directed away from important natural resources. The six characteristics measured are: Stewardship Overlay Designation, Sending Area Proximity, Listed Species Habitat, Soils/Surface Water, Restoration Potential, and Land Use/Land Cover. (emphasis added)

Policy 1.8 describes how NRI values were determined in 2002. There are several things to note about this policy. First, these values are purportedly relative to other lands. Relative in what way? Determined by who? Considering which factors? The policy claims that the 2002 NRI values were objectively determined, however, there is no methodology provided in order to determine how objective the factors were, if any of those factors have changed, or how to mitigate for the changes that have occurred since 2002, nearly 20 years later. There is also no notes to indicate how certain scores for each index were determined. And since we don't know what the original values were based on, it is impossible to recalibrate the model to work under existing conditions.



The Collier County
Rural Lands Stewardship Overlay

Presented to:
Collier County
Board of County Commissioners

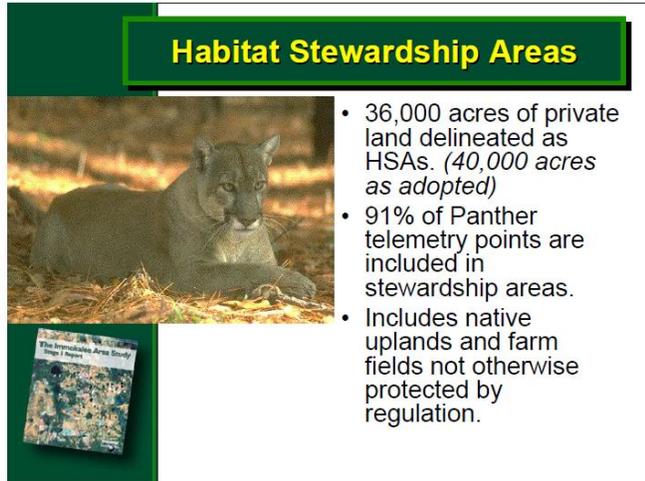
Presented by:
Alan Reynolds, AICP
President/CEO
WilsonMiller, Inc.
June 12, 2002

(Updated for presentation to RLSA Review Committee
December 4, 2007)

We reviewed this document/presentation to help us understand how valuation was determined. While there are many aspects of the entire presentation that may be useful in understanding the NRI system, a startling fact was discovered regarding panther telemetry and panther habitat. In 2002, the presentation claimed that 91% of all panther telemetry occurred in the Stewardship Areas. It is unclear whether

the presentation is referring to all Stewardship Areas or only the Habitat Stewardship Areas (HSAs). The presentation seems to imply that protecting the Stewardship areas are enough to protect habitat for the Florida Panther.

While this may have been the extent of knowledge in 2002, it is not true in 2021. In 2021, when we analyzed publicly available telemetry through 2020, which included GPS and VHF telemetry, we discovered that only 84% of telemetry points occur in the stewardship areas.¹ That is substantially less and a clear



Habitat Stewardship Areas

- 36,000 acres of private land delineated as HSAs. (40,000 acres as adopted)
- 91% of Panther telemetry points are included in stewardship areas.
- Includes native uplands and farm fields not otherwise protected by regulation.

indication that protecting stewardship areas is not enough to protect land vital to the recovery and survival of the Florida panther. The NRI methodology is flawed, and cannot be relied on. It is also important to note that only a small number of panthers, historically and currently, have been collared and able to provide telemetry data points.

Telemetry points provide limited information about where some panthers have been and landscape that some panthers use. Further, a majority of the historical telemetry data was provided by VHF collars where data was collected during daytime hours, and not during the crepuscular or evening hours when panthers have a more expansive use of non-forest landscapes. Because of this, relying too much on telemetry and not considering panther habitat zones and adult breeding habitat mapped and studied by leading panther scientists is an unsound practice from both a policy and science standpoint. We recommend utilizing best available science to help support the recovery and survival of the Florida panther. This issue is expanded upon below.

¹ Please note that if the 2002 presentation was only referring to HSAs, only 49% of panther telemetry is found in HSAs.

FLORIDA PANTHER

Policy 4.9: A SRA must contain sufficient suitable land to accommodate the planned development in an environmentally acceptable manner. The primary means of directing development away from wetlands and critical habitat is the prohibition of locating SRAs in FSAs, HSAs, and WRAs.

Bellmar does not contain sufficient suitable land to accommodate the planned development. It destroys 1,000 acres of primary panther habitat, and nearly 800 acres of Florida Panther adult breeding habitat.

The survival and recovery of the Florida panther are dependent upon maintaining, restoring, and expanding the panther population and its habitat in southern Florida. Specifically, the recovery of the Florida panther population is dependent on maintaining the ability of the Primary, Secondary, and Dispersal Zones, as identified by expert panther biologists in Kautz et al. (2006)¹, to contribute to a viable population. Habitat loss and fragmentation are the greatest threats to the Florida panther; these threats are primarily a result of rapid population growth and conversion from natural habitats and agriculture to urban land use.²

LDC 4.08.05.J.2 states If listed species are directly observed on the site of the project or are indicated by evidence, such as denning, foraging, or other indications, first priority shall be given to preserving the habitat of such listed species a minimum of 40% of native vegetation on site shall be retained, with the exception of clearing for incidental purposes.

LDC 4.08.05.J.3.d.vi. directly addresses the Florida panther, stating that for projects located in Priority I or Priority II Panther Habitat areas, the management plan shall discourage the destruction of undisturbed, native habitats that are preferred by the Florida panther (*Felis concolor coryi*) by directing intensive land uses to currently disturbed areas. Preferred habitats include pine flatwoods and hardwood hammocks. In turn, these areas shall be **buffered** from the most intense land uses of the project by using low intensity land uses (e.g., parks, passive recreational areas, golf courses).

There is a constant chipping away at the necessary range for the Florida panther that is rarely considered. Each individual project slowly limits the range for the Florida panther both through destruction of habitat, fragmentation of habitat and fragmentation of movement corridors.

This project both destroys and fragments important Florida panther habitat as well as eliminating movement corridors. If even one project in the RLSA ignores the best available science, there will be a detrimental impact on the Florida Panther population. This is particularly true given the way the Natural Resource Index Value is being interpreted and implemented for listed and endangered species.

LDC 4.08.01.Q. is about the Listed Species Habitat Indices stating that one of the indices comprising the Natural Resource Index Value, with values assigned based upon the habitat value of the land for listed species. Index values are based on documentation of **occupied habitat as established by the intersect of documented and verifiable observations of listed species with land cover** identified as preferred or tolerated habitat for that species. Land mapped, using FLUCFCS, as 310, 321, 411, 425, 428, 434, 617, 6172, 621, 6218, 6219, 624, and 630 was deemed to be preferred or tolerated habitat for panthers for the purpose of assigning a value for these indices. An intersection of at least one data point establishing the presence of a listed species within a geographic information system (GIS) polygon of preferred or tolerated habitat for that species shall result in the entire polygon being scored as occupied habitat.

The FLUCFCS codes deemed preferred or tolerated do not limit the County from including other codes to qualify as preferred or tolerated habitat based on best available science and panther data available at the time this application is reviewed. The FLUCFCS codes listed in the LDC need to be considered the bare minimum and not the only FLUCFCS codes tolerated, preferred, or needed for the recovery and survival of the Florida panther. This policy was crafted in 2002, and could have been based on the best available data 19

years ago. We know a lot more about the Florida panther now, and practices should be based on the best available science.

In 2012, the US Fish and Wildlife Service revised their Panther Habitat Assessment Methodology for the agency to utilize in assessing the functional value of panther habitat. While there are flaws within this system, the federal wildlife agency utilizes this methodology, which incorporates both the Kautz zones and other scientific information related to land cover valuation, for its permitting decisions. As seen in the below table, a review of literature that was done in production of this document, shows row crops as an average 4.8 (where the lowest value is 0 and the highest value given is 9.5). The document further shows that land covers in the “4-6” valuation are considered “neither selected nor avoided,” i.e. tolerated.

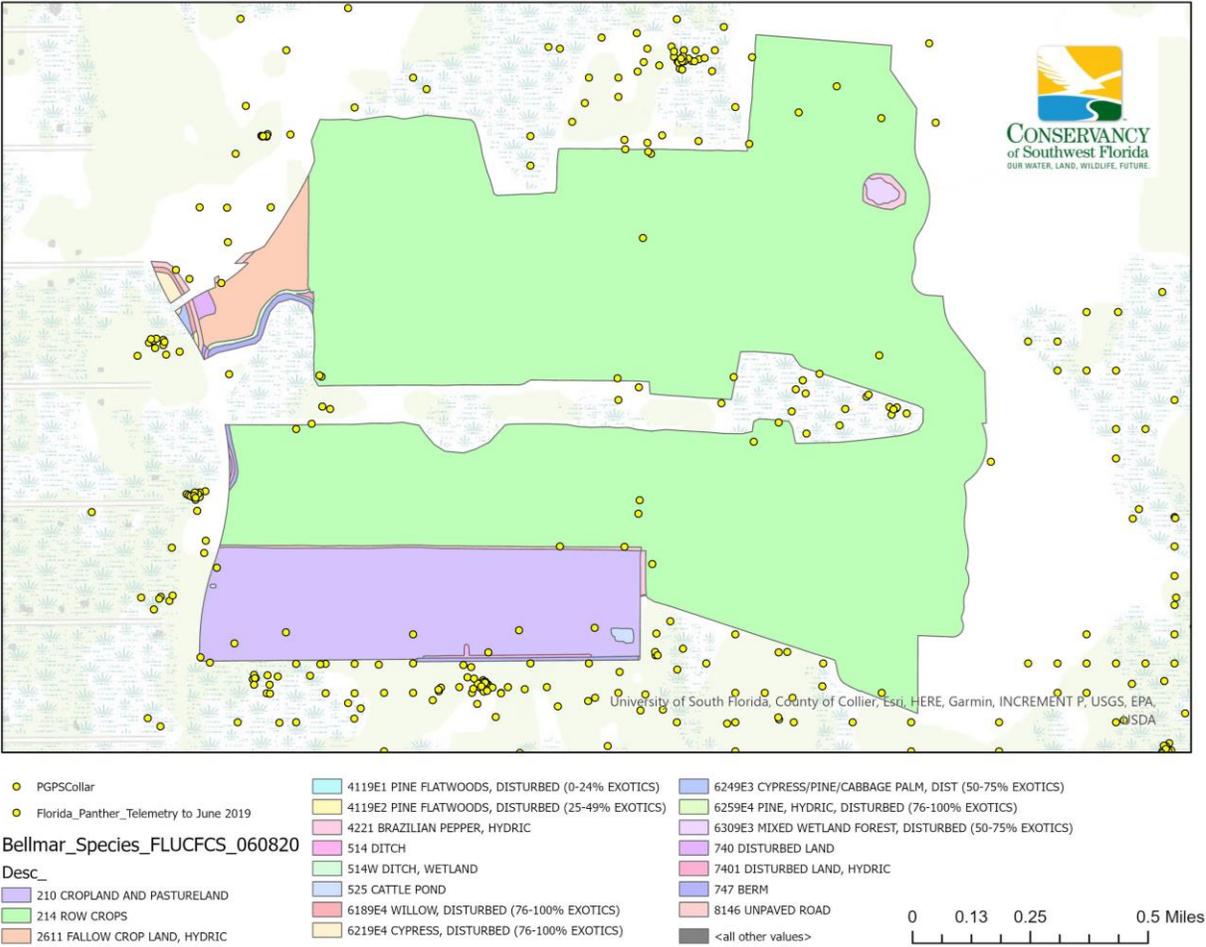
Table PM7. Summary of Ranking Values

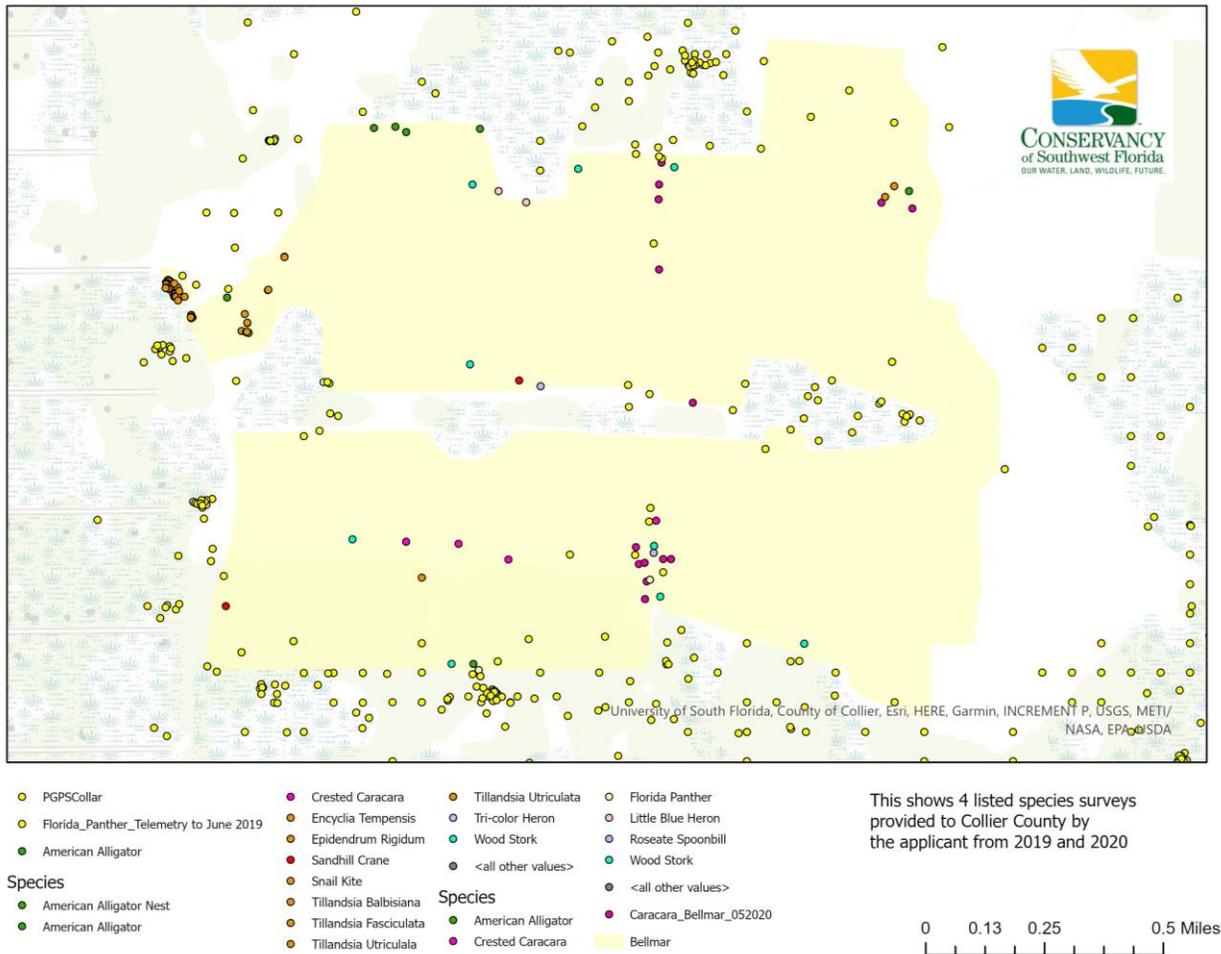
| Habitats | Kautz compositional second order | Kautz Euclidean second order | Cox Euclidean second order | Cox Euclidean third order | Land VHF Euclidean third order | Land GPS Euclidean third order | Average |
|--------------------|----------------------------------|------------------------------|----------------------------|---------------------------|--------------------------------|--------------------------------|---------|
| Hardwood swamp | 10 | 7 | 9 | 10 | 10 | 9 | 9.2 |
| Pineland | 9 | 8 | 10 | 10 | 10 | 10 | 9.5 |
| Cypress swamp | 8 | 9 | 9 | 10 | 10 | 9 | 9.2 |
| Upland forest | 10 | 6 | 8 | 10 | 10 | 10 | 9.0 |
| Dry prairie | 6 | 5 | 8 | 6 | 6 | 7 | 6.3 |
| Shrub and brush | 7 | 3 | no data | no data | 6 | 6 | 5.5 |
| Xeric scrub | 8 | 1 | no data | no data | no data | no data | 4.5 |
| Marsh | 6 | 1 | 6 | 3 | 6 | 6 | 4.7 |
| Unimproved pasture | 4 | 3 | 8 | 6 | 6 | 7 | 5.7 |
| Barren | 5 | 1 | 7 | 6 | 6 | 6 | 5.2 |
| Improved pasture | 2 | 4 | 7 | 6 | 6 | 6 | 5.2 |
| Urban | 3 | 2 | 7 | 6 | 6 | 6 | 5.0 |
| Cropland | 2 | 2 | 7 | 6 | 6 | 6 | 4.8 |
| Citrus | 1 | 2 | 7 | 6 | 6 | 6 | 4.7 |
| Coastal wetlands | 0 | 2 | no data | no data | no data | no data | 1.0 |
| Open water | 1 | 0 | no data | no data | 6 | 6 | 3.3 |
| Exotic plants | | | | | | | |
| STA | | | | | | | |
| Reservoir | | | | | | | |

| | |
|------------------------------|----------|
| habitat selection | 7,8,9,10 |
| neither selected nor avoided | 4,5,6 |
| habitat avoidance | 0,1,2,3 |

As shown in the map below, Florida panthers have been documented in multiple FLUCFCS codes throughout the site. Many of these FLUCFCS codes – particularly the large green area (214, Row Crops), also have other documented listed species. The NRI value for the green area, however, for listed species is 0. This 0 is condoned because 214, under the

RLSA program, is not deemed to be preferred or tolerated for listed species even though we know by virtue of their presence that this area of Bellmar is, at minimum, tolerated by listed species including the Florida panther, wood stork, sandhill crane, tri-color heron, and crested caracara. A scoring system that ignores the rich diversity of land “tolerated” by at least 5 listed species is fatally flawed and should not be relied on to appropriately guide development.





Staff is not considering the actual presence of listed species when scoring the project. The land development code should be used as guidance not relied on as absolute when determining whether a specific FLUCFCS code is preferred or tolerated by a species. Presence of a species is evidence that a FLUCFCS code on a specific site is, at a minimum, tolerated by a listed or endangered species. There are numerous documented presence locations for these species within the proposed Bellmar footprint.

Why the Scoring Matters

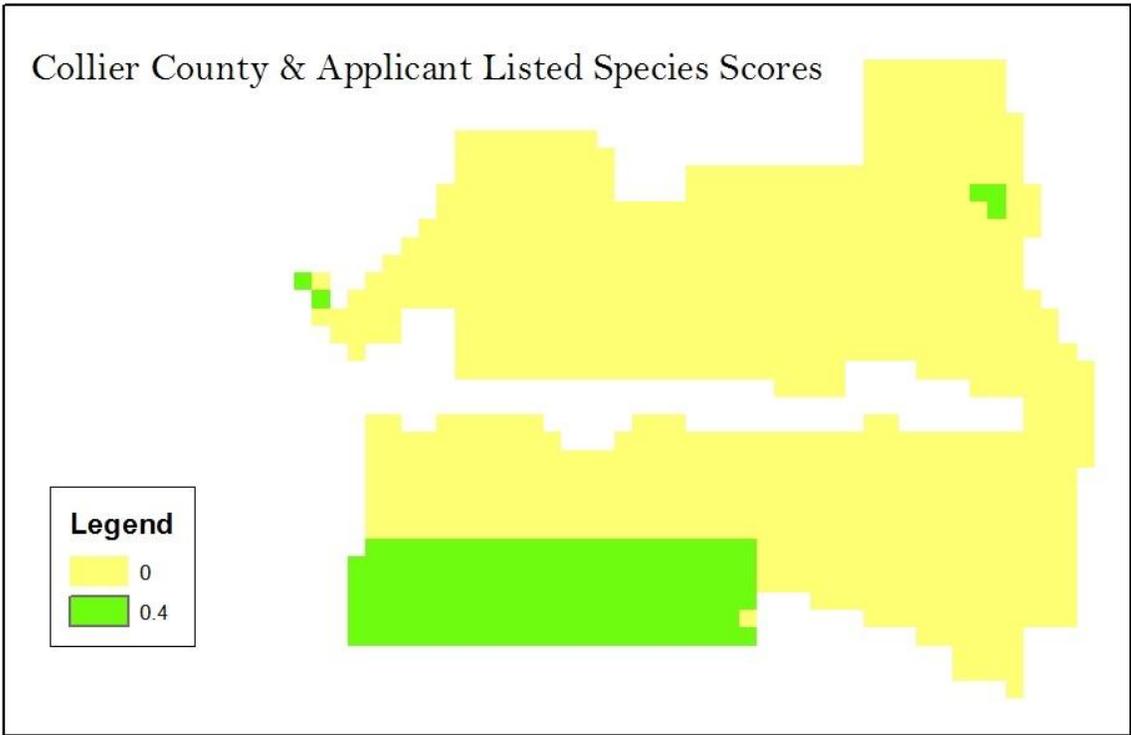
The basis of the RLSA classification of lands as Flowway Stewardship Areas (FSA), Habitat Stewardship Areas (HSA), Water Retention Areas (WRA) or Open Lands, utilized a numeric scoring system created specifically for the RLSA. This system considered a number of data

layers, such as soils, land use and restoration potential (as discussed earlier in this letter). In total, there are 6 categories that, when added up generate a number ranging from 0 to 2.4. The number generated from each of these 6 categories is called the Natural Resource Index (NRI) index, or value, and was created and is unique to the RLSA. The composite total of these 6 scores is referred to as the NRI score, and again, was created and is unique to the RLSA. Each acre of land is intended to be scored individually to create a specific NRI score.

When the RLSA program was designed, the program creators, WilsonMiller working on behalf of their landowner clients, arbitrarily selected 1.2 to be the cutoff of lands allowed for future intensification (as Stewardship Receiving Areas, or SRAs) versus lands where development intensification would be directed away from (FSAs, HSAs and WRAs). While there was no scientific methodological basis for allowing SRAs on lands that scored 1.2 or below, that is how the program is established.

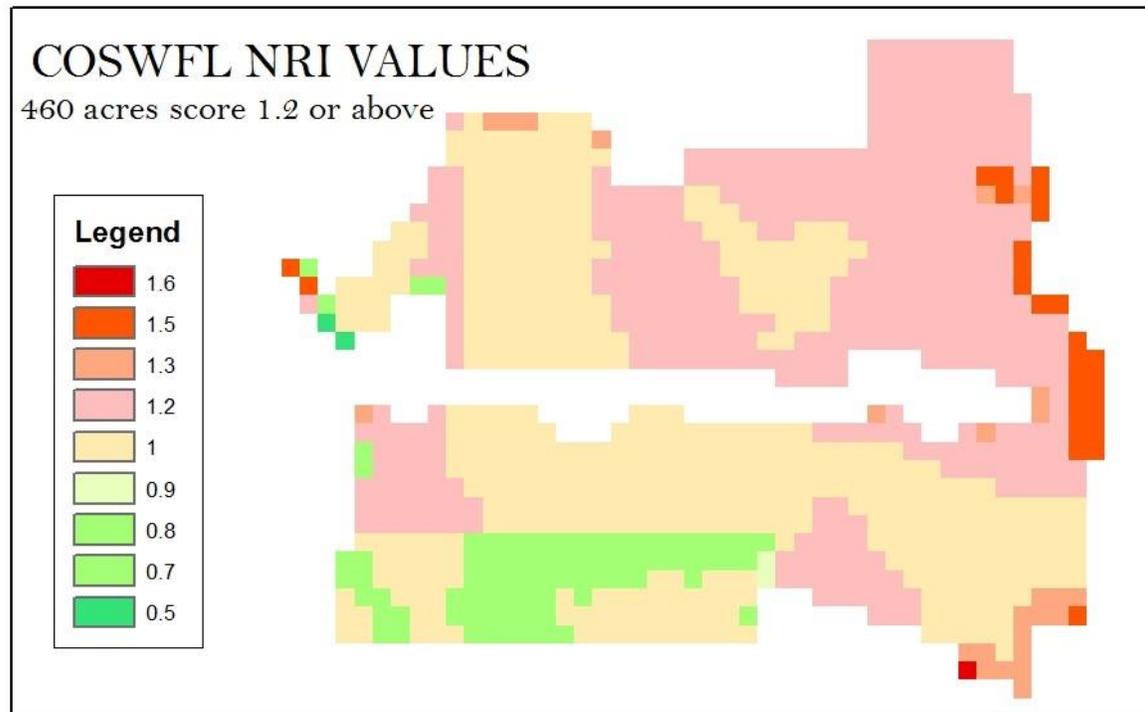
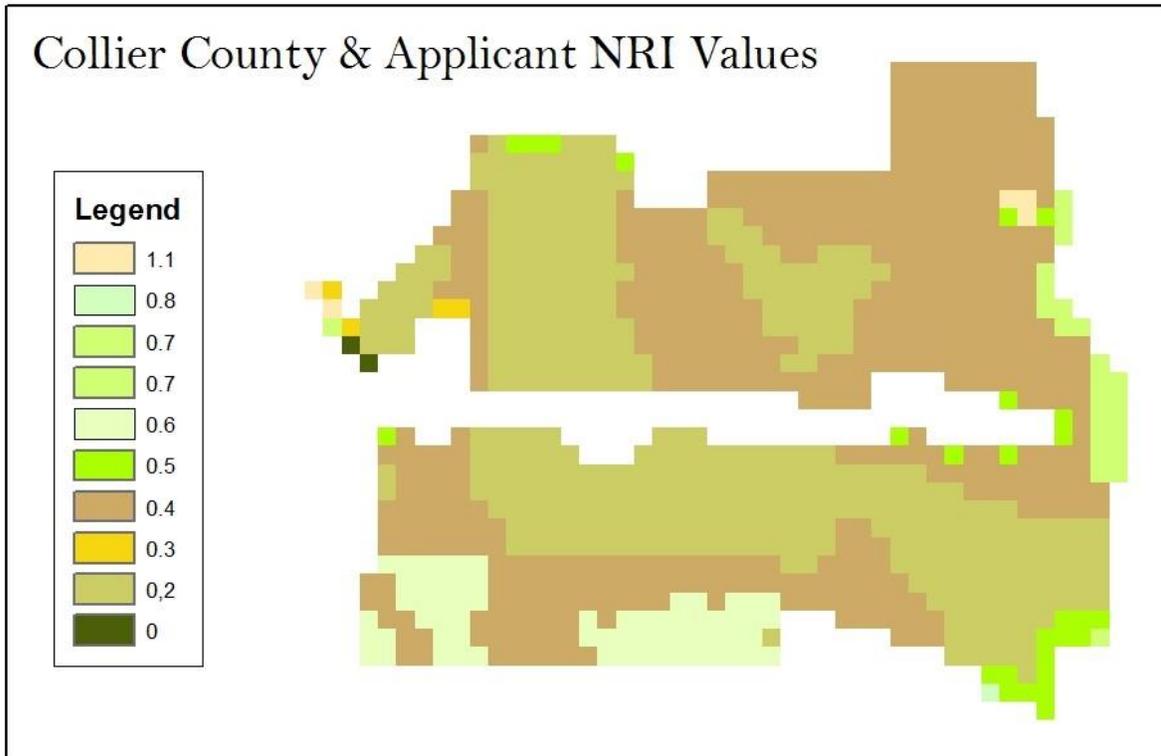
Most of these NRI values are relatively constant, such as the soils category. However, the category where there is the most potential for significant change is the Listed Species Habitat Indices. This category must be evaluated so that scores are based on best available science at the time a new application comes forward. The importance of this is because the presence of listed species results in a much higher NRI index value. If that value, as combined with the other 5 indices, results in the total NRI score being above 1.2, then those specific acres, while still being allowed within the footprint of a SRA, cannot be intensified and must be retained in their natural state. If any part of Bellmar exceeds 1.2, then development is not allowed on those lands. As you will see below, the Conservancy has calculated there are indeed acres within the footprint of Bellmar that exceed 1.2. While it appears that most of the acres which score over 1.2 are in lakes or preserve, there may be a few which occur in the area marked as village center. This issue should be clarified by staff.

The below maps demonstrate why appropriate scoring matters, as it can dramatically change the resulting NRI score and ultimately the footprint of SRA development.



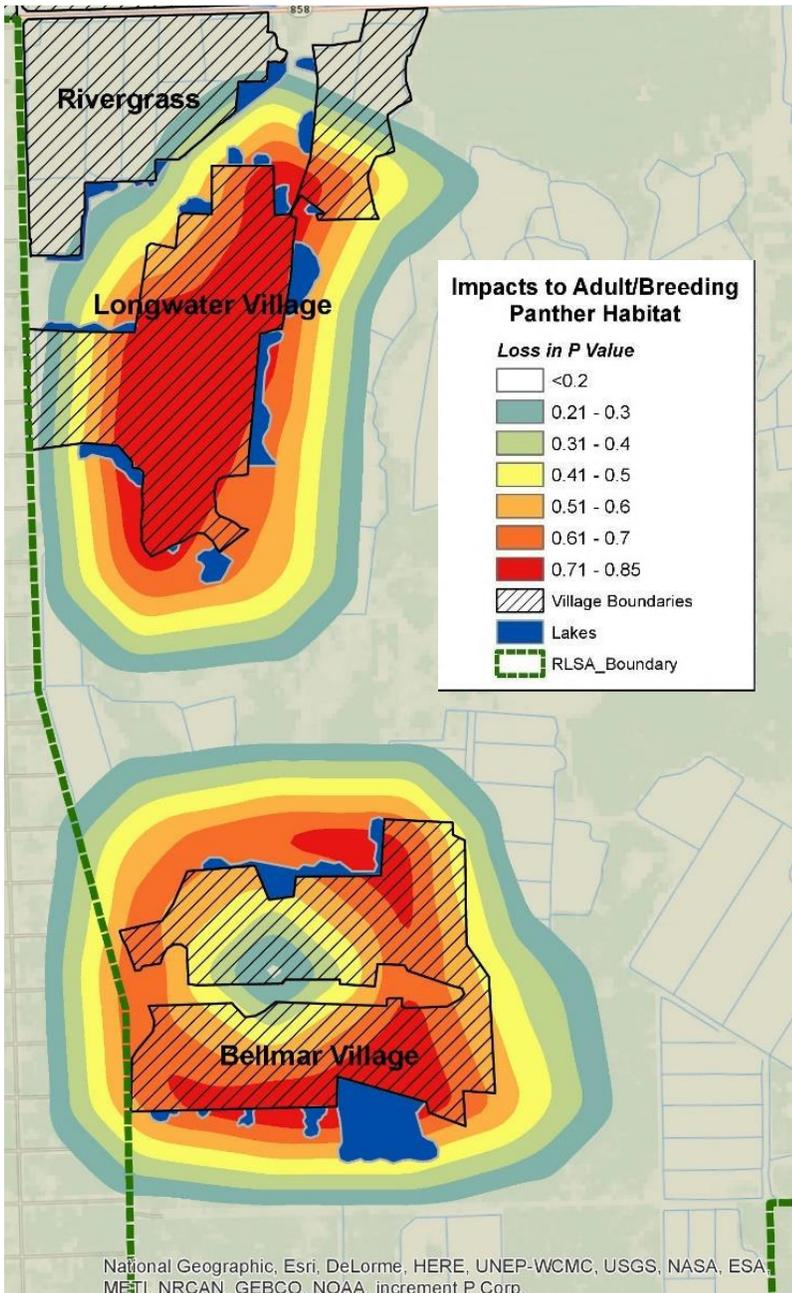
Date: 2/8/2021

Changing the Listed Species score also changed the final NRI scores for the property.



Date: 2/8/2021

Moreover, it is not just panther zones adopted by USFWS that the County needs to be



concerned with. Dr. Robert Frakes, a leading panther habitat modeler, published a paper in 2015 identifying the most important breeding areas for the Florida panther. Dr. Frakes provided the Conservancy with a map showing the location of where significant loss in function of Adult Breeding Habitat is predicted if the villages were to move forward. According to Frakes et al. 2015 model, lands with a value of 0.338 or higher are considered Adult Breeding Habitat. If direct or indirect impacts occur and the value of the lands become less than 0.338, they lose their function for adult breeding panthers. **The inserted graphic** shows the loss of Adult Breeding Habitat value from the proposals, with the shaded

yellow, orange, and red areas showing the worst impacts to Adult Breeding Habitat. Not only do the SRA sites result in a significant and devastating loss of Adult Breeding Habitat, but nearly all of the lake tracts (shown in blue) within the Water Retention Areas of Longwater and Bellmar would also result in habitat function loss. Adult breeding habitat is not considered in any way for the NRI value or score. We note that if approved, there will be additional detrimental impacts by building the main road – Big Cypress Parkway – as

well as any connector roads between villages. As a reminder, vehicle collisions are the leading known cause of panther mortality.

The survival and recovery of the Florida panther are dependent upon maintaining, restoring, and expanding the panther population and its habitat in southern Florida. Specifically, the recovery of the Florida panther population is dependent on maintaining the ability of the Primary, Secondary, and Dispersal Zones, as identified by expert panther biologists Kautz et al. (2006)² to contribute to a viable population. Habitat loss and fragmentation are the greatest threats to the Florida panther; these threats are primarily a result of rapid population growth and conversion from natural habitats and agriculture to urban land use.³

Panthers are wide ranging, secretive, and occur at low densities.⁴ They require large contiguous areas to meet their social, reproductive, and energetic needs, a requirement that is being compromised by rapid development.⁵ Panther habitat continues to be lost to urbanization, residential development, conversion to agriculture, and mining.⁶ Because of this, there is a need for land use planning that incorporates panther conservation and recovery. Protection of the remaining breeding habitat in south Florida is essential to the survival and recovery of the Florida panther.⁷ Further loss of adult panther breeding habitat is likely to reduce the prospects for survival of the existing population, and decrease the probability of natural expansion of the population into south-central Florida⁸.

² Kautz, R. et al, How much is enough? Landscape-scale conservation for the Florida panther, *BIOLOGICAL CONSERVATION* 130 (2006) 118 – 133

³ Kautz, R. et al, How much is enough? Landscape-scale conservation for the Florida panther, *BIOLOGICAL CONSERVATION* 130 (2006) 118 – 133

⁴ Frakes RA, Belden RC, Wood BE, James FE (2015) Landscape Analysis of Adult Florida Panther Habitat. *PLoS ONE* 10(7): e0133044. <https://doi.org/10.1371/journal.pone.0133044>

⁵ Kautz, R. et al, How much is enough? Landscape-scale conservation for the Florida panther, *BIOLOGICAL CONSERVATION* 130 (2006) 118 – 133

⁶ Kautz, R. et al, How much is enough? Landscape-scale conservation for the Florida panther, *BIOLOGICAL CONSERVATION* 130 (2006) 118 – 133

⁷ Kautz, R. et al, How much is enough? Landscape-scale conservation for the Florida panther, *BIOLOGICAL CONSERVATION* 130 (2006) 118 – 133

⁸ Frakes RA, Belden RC, Wood BE, James FE (2015) Landscape Analysis of Adult Florida Panther Habitat. *PLoS ONE* 10(7): e0133044. <https://doi.org/10.1371/journal.pone.0133044>

Florida Bonneted Bat

There is also potential impact to the Florida bonneted bat. Florida bonneted bats are different from most other Florida bat species because they are reproductively active through most of the year, and their large size makes them capable of foraging long distances from their roost⁹. Consequently, this species is vulnerable to disturbances around the roost during a greater portion of the year and considerations about foraging habitat extend further than the localized roost. Note that the protected species assessment dated August 2017 states “[w]idely scattered pine tree snags with potential bonneted bat cavities were observed.” The United States Fish and Wildlife Service provided the included Figure 1 showing the consultation area in 2019.¹⁰



Figure 1. Florida Bonneted Bat Consultation Area. Hatched area (Figure 2) identifies the urban development boundary in Miami-Dade and Broward County. Applicants with projects in this area should contact the Service for specific guidance addressing this area and individual consultation. The Consultation Key should not be used for projects in this area.

The bonneted bat was listed as endangered in 2013, but we do not see evidence that a consultation was completed for this species. The United States Fish and Wildlife Service updated their consultation key for the bat, and Figure 1 shows the consultation area, of which this project falls within.¹¹ Before this application can be approved, the applicant needs to provide information to the agencies to determine if there are foraging or roosting bonneted bats on-site or in the vicinity.

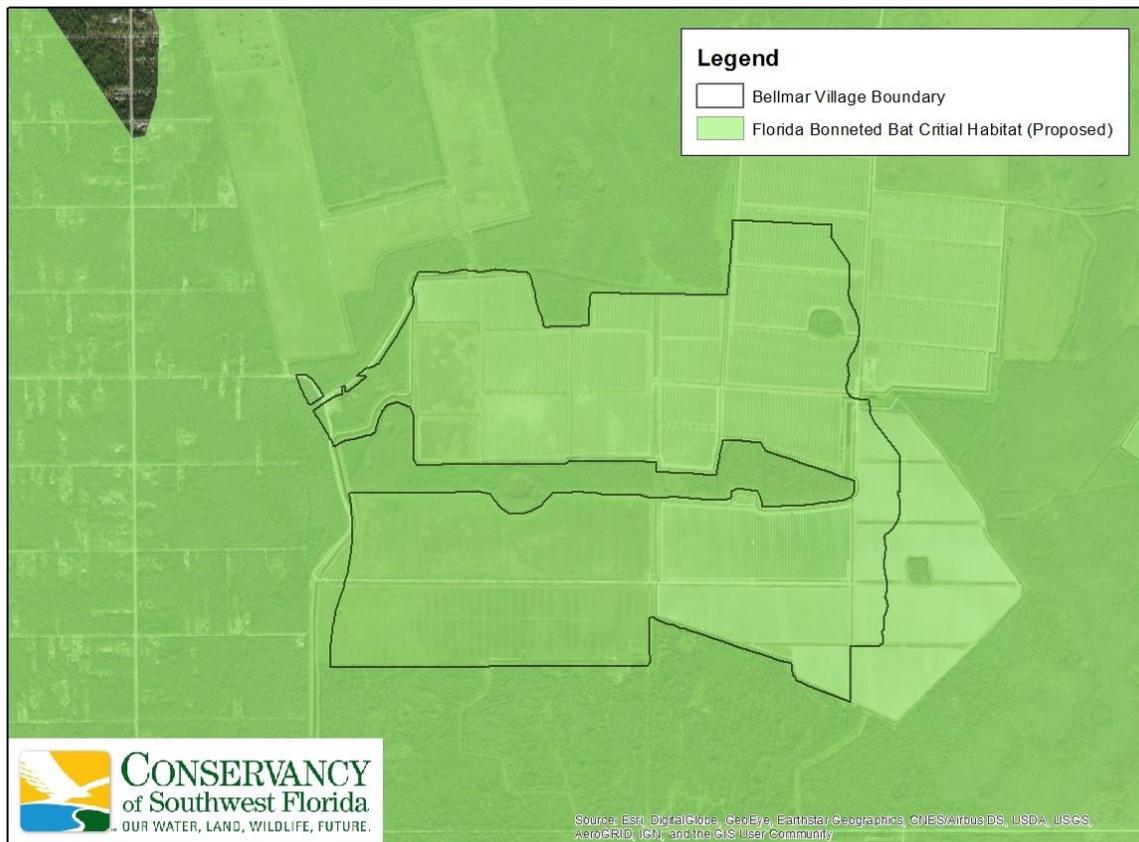
⁹ Ober, H. 2016. Annual report to USFWS for calendar year 2016. Permit number TE23583B-1. University of Florida, Department of Wildlife Ecology and Conservation, North Florida Research and Education Center. Quincy, Florida.

¹⁰ https://www.fws.gov/verobeach/ProgrammaticPDFs/20191022_letter_ServicetoCorps_FBB-ProgrammaticKey.pdf

¹¹ https://www.fws.gov/verobeach/ProgrammaticPDFs/20191022_letter_ServicetoCorps_FBB-ProgrammaticKey.pdf

Additionally, as shown on the included map, 100% of the Bellmar site is proposed critical habitat for the Florida Bonneted Bat.¹² Consideration of how the proposed development would impact this proposed¹³ habitat is also warranted.

Bellmar Village & Florida Bonneted Bat Proposed Critical Habitat



Date: 2/12/2021

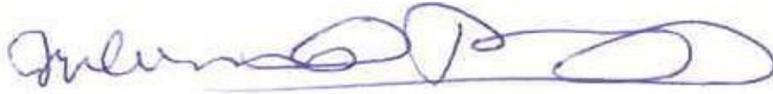
In conclusion, the Bellmar Village SRA application is an inappropriately designed project in a completely unsuitable location. Bellmar does not meet the intent of the RLSA program, does not meet the standards required of a village in terms of diversity or building in a location that will not result in extreme environmental harm. We request that your recommendation be to deny this application.

¹² Shapefile provided by US Fish and Wildlife Service.

¹³ Federal Register, Vol. 85, No. 112, P. 35510. June 10, 2020.

Please feel free to contact me if you have additional questions or need additional information.

Sincerely,



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