



April 13, 2018

Anthony Rodriguez, AICP
Lee County Community Development, Zoning
1500 Monroe Street
Fort Myers, FL 33901
Transmitted via email: ARodriguez4@leegov.com

Re: Eden Oak Re Zoning Request DCI2016-00026

Dear Mr. Rodriguez:

This letter is written on behalf of the Sanibel Captiva Conservation Foundation to submit our profound objections to the Eden Oak Zoning Request DCI2016-00026.

The application seeks to rezone 36 acres of jurisdictional, coastal, mangrove wetlands and open water, from Agricultural (AG-2) to Residential Planned Development (RPD) to enable the development of 55 single family homes and 56 boat slips. The proposed development site is located on both sides of Shell Point Blvd surrounded by the Shell Point Community to the North, San Carlos Bay to the West and the Estero Bay State Buffer Preserve to the South.

Development on this property has been proposed and appropriately rejected repeatedly over the past 40 years beginning with *The Estuaries* in the 1970s, due to the critical location, services and functions of these wetlands, mangrove habitat that provides public protection from storm surges, flooding and designated critical habitat used by numerous endangered and listed species. These critical functions are even more important today as over half of Lee County's wetlands have been eliminated for development and sea level rise presents a progressive erosion of wetlands that will significantly increase the storm surge hazard in the next 20 years.

This project is contrary to the public interest and does not meet the Goals, Policies and Objectives of the Lee County Comprehensive Plan or the Land Development Code that have been adopted to assure public safety and carefully plan for growth and its effects.

I. Development Proposal

Density Calculations

The applicant's calculation of 55 dwelling units is based on their assertion that there are 8 acres of uplands on the 306 acres and that a small portion of the northern property boundary is within the Suburban Land Use category. However, the property is currently identified on the Future Land Use Map as Environmentally Critical Wetlands.

SCCF Comment: We challenge the applicant's characterization and assertion that isolated, spoil piles created by the excavation of mosquito ditches through healthy mangroves meets the definition of uplands. The Future Land Use Map shows the entirety of the property as Environmentally Critical Wetlands. Three sides of the applicants property is adjacent to wetlands zoned AG-2 thus the maximum calculation of units would not approach 55 units. The County would create a cancerous precedent by allowing increased density over current zoning by allowing the applicant to use the subdivision zoning along the north boundary to calculate their unit count when that property was established before the comprehensive plan. Far more of the applicant's property is wetlands on three sides of the property which should be a stronger consideration for future zoning.

Further, there was no entitlement expectation established when the applicant engaged in planning development on this property.

Lee Co. Land Development Code Section 34-935 (2) requires:

Other planned developments. Minimum area and dimensions are not specified for other planned developments. However, the net developable land remaining, after deleting any environmentally sensitive lands and waters, must be of such size, configuration and dimension as to adequately accommodate the proposed structures, parking, access, on-site utilities, including wet or dry runoff retention, all required open space, including buffers, and similar spatial requirements.

SCCF Comment: The 55 units assumed by the applicant is inflated based upon this land development code requirement and was calculated prior to accounting for the wet and dry detention required for their water quality plan which would need to be approved by a yet to be submitted Water Management District permit. SCCF submits that the number of units allowed is much less than 55 units.

Other Agency Applications

Lee County Staff's sufficiency finding omits several important issues. While County approval of this application is not contingent upon the approval of other agencies such as the Corps of Engineers or the South Florida Water Management District (SFWMD), the application to Lee County relies heavily on water management, mitigation plans and environmental restoration efforts regulated by these other agencies. The SFWMD Eden Oak application was withdrawn on 2/26/18 after the Lee Co. Zoning additional info was submitted on 2/19/18. Therefore any references to a non-existent agency application cannot be assumed or considered in Lee County's review of the project and at a minimum the applicant should be required to submit to the County for review any and all restoration plans and mitigation agreements referred to in the original county application before being found sufficient. Please see the following items that were referred to in the application but not included.

- Several features found sufficient by Lee County rely on the validity of the SFWMD permit that has been withdrawn will invariably change when it is resubmitted. The applicant refers

to the a 261 acre Wetland Conservation easement with SFWMD and the storm water management plan repeatedly throughout the justification as to how they meet the County's Lee Plan Goals, Objectives and Policies. There can be no assurance that these improved water quality claims will be met since there is no South Florida Water Management District application to review.

- SFWMD conservation easement over the 261 acres not affected by the development is non-existent since there is no active/valid SFWMD application for this project. The County cannot assess the validity of plans and agreements that are to serve as a compliment to the County application if there is not a written commitment and acceptance.
- The Smalltooth sawfish critical habitat replacement plan, referenced on page 29 of the applicant's 2/29/18 "Additional Info" submission that claims no adverse impacts to this species is not included in the Lee County supporting documentation and has not been subject to evaluation by the state regulatory agencies.

Mitigation & Wetland Assessment

Since there is currently no SFWMD ERP application for Eden Oak, the County cannot qualify the wetland mitigation and UMAM analysis of the mangrove impacts submitted by the applicant.

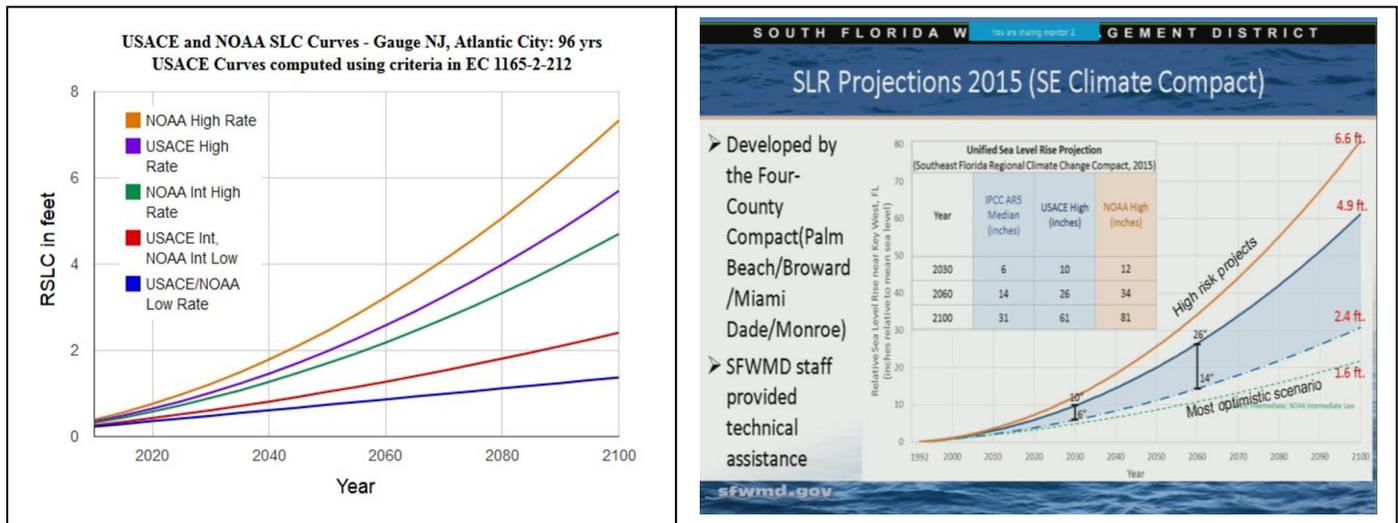
Justification that this land is impacted and not as functional as the majority of the wetlands surrounding it is the result of illegal, unpermitted clearing in 1984 that was partially restored by a DER enforcement action. Personal communication from James Beever, currently Principal Planner with the Southwest Florida Regional Planning Council and formerly Resource Management and Research Coordinator with the Bureau of State Submerged Lands and Preserves, confirmed former environmental violations on the Eden Oak property. Mr. Beever served in a supervisory capacity with the State Department of Environmental Regulation for Southwest Florida in 1984 when the illegal clearing of wetland mangroves was conducted on the subject parcel. Mr. Beever oversaw the violation assessment for the state and worked with the Corps of Engineers on the restoration plan for the property. He stated that the property was restored to the satisfaction of the Corps of Engineers at that time.

II. Public Health and Safety in the Coastal High Hazard Zone

There are several important policies that address limiting building in coastal high hazard zones to protect residents and property from the imminent dangers associated with flooding, tropical storms and hurricanes. This development proposes to permanently eliminate 36 acres of wetlands/surface waters and dredge 3 to 4 foot canals in an area that currently serves as the front line in protection of private and public property absorbing the detrimental effects of flooding and storm surge. The projects proposal to build units and dredge canals in current wetlands that serve this critical function of storm abatement, will expedite and significantly

increase water surge and flooding threatening the County's ability to manage the high hazard zone to protect infrastructure, public health and safety.

The application does not address how the public health safety and welfare are served by placing 55 units and 56 boat docks in wetlands in a coastal high hazard area that will experience 1 foot to 20 inches of sea level rise or more within 30 years, the time of a typical mortgage. Projection graphs:



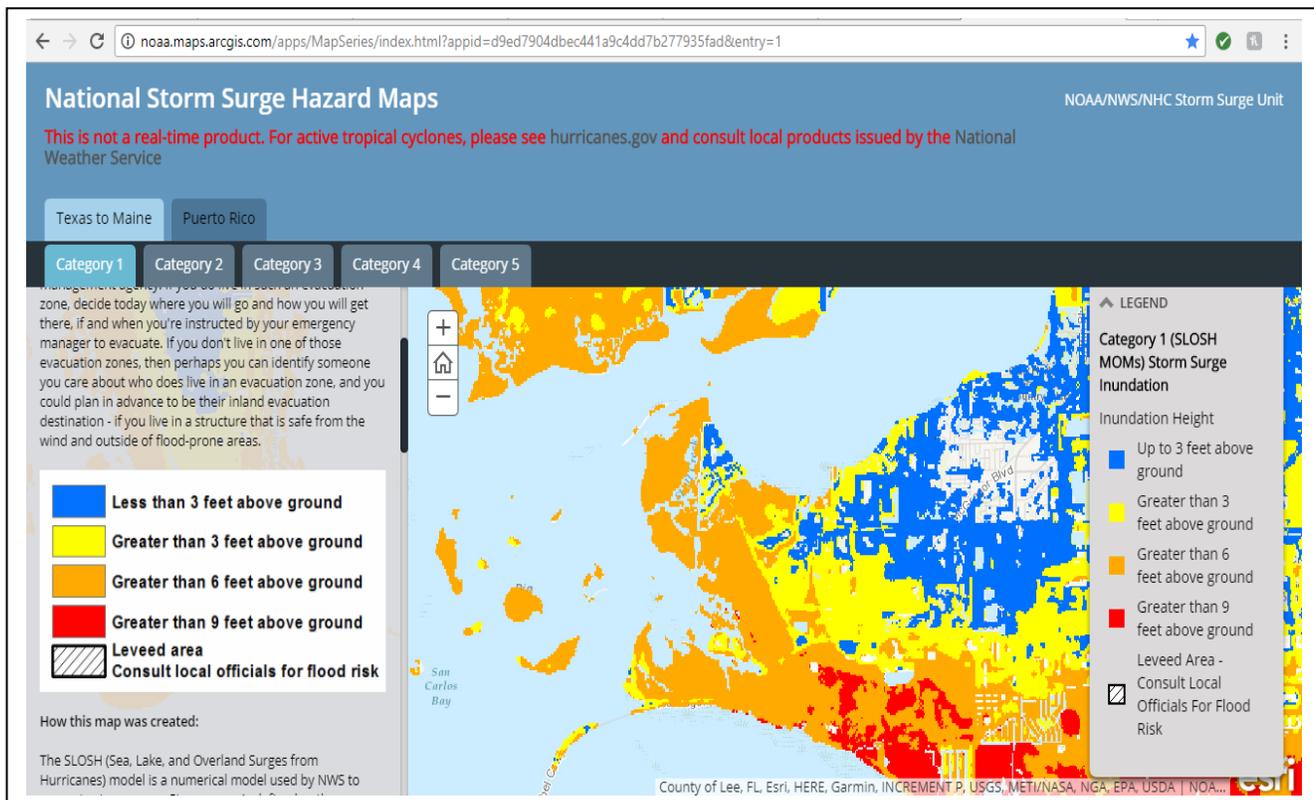
Emergency Planning

The National Oceanic and Atmospheric Administration (NOAA) recently updated their Sea, Lake and Overland Surges from Hurricanes (SLOSH) model which documents that the Eden Oak property is located in one of the most exposed, coastal high hazard areas of Lee County vulnerable to a 6 ft storm surge in a minimal Category 1 Hurricane.

Lee County Public Safety Website statistics on Hurricane Irma state that during the storm about 300,000 people in Lee County were ordered to evacuate, prompting the largest sheltering operation in the County's history. During the storm 35,000 individuals sought refuge in 14 shelters.

According to the Land Development Code Chapter 2 hurricane shelter impact mitigation requirements associated with sheltering residents for the 55 proposed units would total only \$3,676. Shell Pointe Blvd is the sole evacuation route for 9,712 dwelling units and the receiving roadway, Summerlin Blvd, is the sole evacuation route for Sanibel and Captiva coastal, barrier islands. The applicant states that additional density in the coastal high hazard area will be minimal.

To adequately address public safety from flood potential and storm evacuation capacity, this density must be calculated in addition to existing development and permitted units currently under construction on Shell Point Blvd and the barrier islands. Taken in the collective, evacuation and flooding risks are substantial before the addition of the proposed additional units.



It is incumbent upon the County to consider the cumulative impacts of development in Coastal High Hazard Zones. Anything less than a cumulative impact assessment of all new development in the area puts all of the residents' health, safety and welfare at risk.

Lee Plan Considerations

For all of the reasons stated above, the Eden Oak proposal does not meet the Goals, Objectives and Policies within the following multiple goals of the Lee Plan:

OBJECTIVE 2.2: DEVELOPMENT TIMING. Direct new growth to those portions of the future urban areas **where adequate public facilities exist** or are assured and where compact and contiguous development patterns can be created. Development orders and permits (as defined in F.S. 163.3164(7)) will be granted only when consistent with the provisions of Sections 163.3202(2)(g) and 163.3180, Florida Statutes and the county's Concurrency Management Ordinance. (Ordinance No. 94- 30, 00-22)

POLICY 2.2.2: Map 1 of the Future Land Use Map series indicates the uses and density ranges that will ultimately be permitted on a given parcel. However, it is not a guarantee that such densities or uses are immediately appropriate, as the map provides for the county's growth beyond the Lee Plan's planning horizon of 2030. During the rezoning process the Board of County Commissioners will balance the overall standards and policies of this plan with three additional factors: Future Land Use II-19 October 2017

1. Whether a given proposal would further burden already overwhelmed existing and committed public facilities such that the approval should be delayed until the facilities can be constructed; and

2. **Whether a given proposal is for land so far beyond existing development or adequate public facilities that approval should be delayed in an effort to encourage compact and efficient growth patterns;** and

3. Whether a given proposal would result in unreasonable development expectations that may not be achievable because of acreage limitations contained in the Acreage Allocation Table (see Policy 1.7.6, Map 16 and Table 1(b)). Additional provisions related to mining are provided in Policy 33.1.4.

In all cases where rezoning is approved, such approval does not constitute a determination that the minimum acceptable levels of service (see Policy 95.1.3) will be available concurrent with the impacts of the proposed development. Such a determination must be made prior to the issuance of additional development permits, based on conditions which exist at that time, as required by Lee County's concurrency management system. (Ordinance No. 94-30, 98-09, 10-20)

SCCF Comment: This area is in the evacuation zone for the most minimal of storms so permitting additional development in wetlands in this flood prone region is in conflict with public safety. How much County shelter space is available in this fast growing region of the County to accommodate the additional development of this project in addition to additional permitted units at Shell Pointe, Gladiolus and other permitted projects. Policy 2.2.2 requires consideration of the availability of adequate public facilities such as shelter space.

GOAL 105: PROTECTION OF LIFE AND PROPERTY IN COASTAL HIGH HAZARD AREAS

POLICY 105.1.4: Through the Lee Plan amendment process, future land use designations of undeveloped areas within coastal high hazard areas will be considered for **reduced** density categories in order to limit the future population exposed to coastal flooding. (Amended by Ordinance No. 92-35, 94-30, 00-22, 05-19) **POLICY 105.1.5:** Zoning requests located in the coastal high hazard area will be considered for reduced or minimum density assignments, in accordance with their future land use category density range. This evaluation should be done in concert with an evaluation of other individual characteristics such as compatibility with existing uses, desired urban form, and availability of urban services. (Added by Ordinance No. 05-19)

SCCF Comment: Policy 105.1.4 calls for a **reduction** in density, not an increase in a coastal high hazard area as this application seeks.

GOAL 109: EVACUATION AND SHELTER. To provide evacuation and shelter capabilities adequate to safeguard the public against the effects of hurricanes and tropical storms

POLICY 109.1.5: Comprehensive plan amendments that increase density within coastal high hazard areas or on islands must meet one of the following criteria in accordance with Section 163.3178(8), F.S.:

Provide appropriate mitigation to satisfy the provisions of either of the previous two paragraphs, which may include without limitation, the payment of money, contribution of land, or construction of hurricane shelters and transportation facilities. The developer must enter into a binding agreement to memorialize the mitigation plan prior to adoption of the plan amendment. (Added by Ordinance No. 09-17, Amended by Ordinance No. 16-07)

SCCF Comment: Policy 109.1.5 requires consideration of the availability of adequate public facilities such as shelter space. The payment required of this applicant to mitigate the costs for hurricane shelters would be \$3, 676. The current ratio used to calculate that cost and the minimal mitigation amount as a result illustrates the point that approving additional density in Lee County Evacuation Zone A does not adequately contribute to the costs associated with a mass evacuation and sheltering event as Lee County experienced this past September with Hurricane Irma. It will certainly add to the already strained infrastructure of required shelter space and congested roadways should an evacuation be ordered.

Additionally there is no Lee DOT agreement yet that the proposed flushing canal underneath Shell Point Blvd will be safe and properly maintained, an important element to the development's approval as Shell Point Blvd is the only ingress and egress for thousands of residents that live on the peninsula.

III. Wetland and Ecological Habitat Loss

Approving a zoning change to allow more density in remaining wetlands and a Coastal High Hazard Zone is specifically contrary to the Lee Plan Goals for: coastal resource protection of environmentally critical areas, wetlands and natural functions protection and protection and conservation of water quality and the economic productivity of these coastal natural resources. The Eden Oak application does not provide competent substantial evidence that the following Lee Plan Goals, Objectives and Policies will be met.

Lee Plan Considerations

GOAL 104: COASTAL RESOURCE PROTECTION. To protect the natural resources of the coastal planning area from damage caused by inappropriate development. (See also Goal 113.) (Amended by Ordinance No. 94-30)

OBJECTIVE 104.1: ENVIRONMENTALLY CRITICAL AREAS. Within the coastal planning area, the county will manage and regulate, on an ongoing basis, environmentally critical areas to conserve and enhance their natural functions. Environmentally critical areas include wetlands (as defined in Goal 114) and Rare and Unique upland habitats. Rare and Unique upland habitats include, but are not limited to: sand scrub (320); coastal scrub (322); those pine flatwoods (411) which can be categorized as "mature" due to the absence of severe impacts

caused by logging, drainage, and exotic infestation; slash pine/midstory oak (412); tropical hardwood (426); live oak hammock (427); and cabbage palm hammock (428). The numbered references are to the Florida Land Use Cover and Forms Classification System (FLUCFCS) Level III (FDOT, 1985). (See also Policy 113.1.4.) The digitization of the 1989 baseline coastal vegetation mapping (including wetlands and rare and unique uplands, as defined above) will be completed by 1996. (Amended by Ordinance No. 94-30, 00-22)

POLICY 104.1.1: Development will be limited in Rare and Unique upland habitats and strictly controlled in wetlands in the coastal planning area. (See Policy 107.1.1(2) and Goal 114.) (Amended by Ordinance No. 94-30, 00-22)

SCCF Comment: The lands contained within the Eden Oak property are classified as environmentally critical in the future land use map. The State of Florida, Department of Environmental Protection estimates that 75% of the game fish and 90% of the commercial fish species in South Florida rely on mangrove habitat. The subjects exceptional mangrove system is considered "*essential fish habitat*" by the National Marine Fisheries Service. The projects mangrove habitat serves as critical nursery and supports other habitats including dense and highly productive seagrass beds, shellfish and oyster bars.

GOAL 107: RESOURCE PROTECTION. To manage the county's wetland and upland ecosystems so as to maintain and enhance native habitats, floral and faunal species diversity, water quality, and natural surface water characteristics.

SCCF Comment: Lee Plan Goal 104.1, Objective 104.1, Policy 104.1.1 and Goal 107 are not adequately addressed by the Eden Oak proposals because of the destruction of habitat and inadequate attempt to mitigate that destruction. Mangroves represent some of the most important wetland habitat for coastal fish and wildlife resources which are critical to the health of our aquatic systems and the specifically designated publicly owned aquatic preserves and national wildlife refuges that surround this site that have been protected for their high resource values. Mosquito fish, shrimp and fiddler crabs are abundant in this tidal system. They form the base of the food chain for fish biodiversity serving both as decomposers of the detrital export and as prey for larger species. Cutting off the nursery area and access will contribute to the degradation of the food web, biodiversity and abundance as well as the water quality. Adding impervious surfaces in the center of a healthy ecosystem will contribute to the decline of the health of the surrounding mangrove wetlands.

Additional Objectives that will not be met by allowing this development are as follows:

OBJECTIVE 107.3: WILDLIFE. Maintain and enhance the fish and wildlife diversity and distribution within Lee County for the benefit of a balanced ecological system. (Amended by Ordinance No. 94-30)

OBJECTIVE 107.4: ENDANGERED AND THREATENED SPECIES IN GENERAL. Lee County will continue to protect habitats of endangered and threatened species and species of special

concern in order to maintain or enhance existing population numbers and distributions of listed species.

SCCF Comment: The Eden Oak project proposal to eliminate 36 acres of wetlands and mangroves is in direct conflict with the Lee Plan goals to protect wildlife and their habitat. Florida mangrove communities are known to provide habitat for a number of threatened and endangered species. The project area serves as nursery habitat for recreational and commercial fisheries, is used by listed species of birds for nesting, feeding and roosting, is used by juvenile and adult sea turtles, the rare and imperiled ornate diamond back terrapin and is a critical habitat for and heavily used by the federally endangered Smalltooth Sawfish and Manatee.

At least three species of endangered sea turtles, both juvenile and adult, are known to use and forage in this area. Any time there is increased boat traffic in an area with sea turtles, there is a heightened concern for collisions. The heightened traffic activity resulting from the addition of 56 boats will push turtles out of the more protected areas into areas of higher boat traffic, increasing collision risks. SCCF sea turtle scientists have documented that many of Sanibel's strandings are due to collisions.

SCCF has also documented use of the project mangrove habitat by the rare and imperiled Ornate Diamondback Terrapin, one of only two species in the world that live in estuarine waters. This species is listed on the Federal CITES list to protect wild populations. Through satellite tracking SCCF scientists are working with USFWS and FWC staff to study the patterns and habitat use of these elusive turtles. To date terrapins have been tagged and documented using the mangrove areas at the project site. In addition to the destruction of the habitat they are documented to be using, increased boat traffic will disrupt sediments, water quality and their habitat use in the only area we have a documented population.

The proposed project area is also heavily utilized by two federally endangered species for which the back bay areas are federally designated critical habitat. The Florida Fish and Wildlife Commission has documented both Manatees and Smalltooth Sawfish congregating, foraging and using the shallow, mangrove lined waters and sea grass beds of the project area.

Additionally these wetlands are utilized as a feeding area for nearby nesting Bald Eagles and recent studies have shown use by the Mangrove Cuckoo which is mangrove exclusive species.

Additional Lee Plan Goals and Objectives that will not be met with the destruction of mangroves and offsite mitigation are:

OBJECTIVE 107.12: MARINE PRODUCTIVITY. Lee County will support maintenance and improvement of marine fisheries productivity, and promote the conservation of fishery resources through the protection and restoration of finfish and shellfish habitat. (Amended by Ordinance No. 00-22)

GOAL 108: ESTUARINE WATER QUALITY. To manage estuarine ecosystems so as to maintain or improve water quality and wildlife diversity; to reduce or maintain current pollution loading and system imbalances in order to conserve estuarine productivity; and to provide the best use of estuarine areas. (Amended by Ordinance No. 94-30)

GOAL 114: WETLANDS. To maintain and enforce a regulatory program for development in wetlands that is cost-effective, complements federal and state permitting processes, and protects the fragile ecological characteristics of wetland systems. (Amended by Ordinance No. 94-30) Every reasonable effort will be required to **avoid or minimize adverse impacts** on wetlands through the clustering of development and other site planning techniques. On- or off-site mitigation will only be permitted in accordance with applicable state standards.

GOAL 115: WATER QUALITY AND WASTEWATER. To ensure that water quality is maintained or improved for the protection of the environment and people of Lee County.

POLICY 115.1.2: New development and additions to existing development must not degrade surface and ground water quality. (Amended by Ordinance No. 00-22)

GOAL 121: FISHERIES MANAGEMENT. To preserve the ecosystem that nourishes and shelters the commercial and sport fisheries in Lee County.

SCCF Comment: With these goals and objectives the Lee Plan clearly directs that the management of estuarine ecosystems will maintain and improve water quality and wildlife habitat and diversity, and reduce pollutant loading to make the best use of the estuarine areas. However, the elimination of wetlands and addition of impervious residential development in a critical resource habitat, does not meet the test for providing the best use of estuarine resources. Further the exchange of critical wetland and mangrove habitat for impervious residential development with its associated runoff and added nutrient loading is in direct opposition to these Lee Plan Goals and Policies.

The elimination of 36 acres of wetlands and mangroves which serve as fisheries nursery and habitat proposes to trade off a critical public resource for short term private financial gain to the detriment of the greater ecological resource needs of the region and the public's interest.

The applicants mitigation proposal to offset the wetland and mangrove loss in a remote and different waterbody and watershed at the Little Pine Island Mitigation Bank does not address the loss of designated critical habitat in the Caloosahatchee estuary nor does it abate the water quality impacts that would be added to a state designated impaired waterbody that the County is responsible for addressing.

The applicant has proposed to offset the wetland impacts with mitigation without a comprehensive assessment of the alternatives that would allow development only on the "spoil" uplands rather than on any of the 36 acres of wetlands that are proposed to be eliminated.

Mitigation is the process by which unavoidable impacts to protected natural resources are offset. Mitigation is considered only after a determination has been made that all possible impacts have been first avoided, then minimized as required by the Lee Plan. Before mitigation is considered it must be demonstrated that all options to avoid impacts have been exhausted.

The project proposes the dredging of canals that are predominately lined with mangroves. Previous dredge and fill operations have reduced mangrove habitat in the Charlotte Harbor National Estuary Preserve (CHNEP) study area by about 25% (Beever et al 2011). In addition to direct loss, urban and agricultural runoff changes water flows to interfere with the beneficial functions performed by mangrove systems. The high cost of developing mangrove habitat is eventually paid by taxpayers in terms of flood and storm damage, shoreline erosion loss of nursery habitat and water quality degradation.

The Eden Oak landscape plan and deed restrictions state that some mangroves will be "maintained" as a hedge for the view corridors of the single family lots while at the same time claiming the environmental benefits of their mangrove replanting plan. Mangroves maintained as a "hedge" will result in substantially less habitat value for wildlife and environmental benefit in nutrient uptake than untrimmed mangroves. The applicant should not receive credit for a replanting plan that reduces the benefit of existing mangrove forest.

Beyond these facts, the proposed mitigation does not address water quality degradation in the impaired Caloosahatchee, nor offset the lost values and functions of the mangrove habitat. The proposal undermines public health and safety and does not address the ecological and economic functions provided by mangroves that are critical to our local and regional economy. In all, the proposed project is incompatible with the Lee Plan policies and provides no meaningful mitigated offset.

IV. Economic Value of Resources

The consequences of the proposed project are not consistent with the public investment by Lee County, the State of Florida and federal government to preserve valuable natural resources. The mangroves of the project area serve as critical estuary nursery habitat for public preserves including three National Wildlife Refuges (J.N. "Ding" Darling, Pine Island Sound and Matlacha Pass), two aquatic preserves (Pine Island Sound and Matlacha Pass and the Charlotte Harbor National Estuary Program area. These areas, designated by both Federal and state governments have been protected to preserve their rare and unique habitat, valuable fish and wildlife resources and water quality. Today, Matlacha Pass and the Caloosahatchee are designated impaired due to development of wetland and upland habitat.

Studies have clearly demonstrated that the ecosystem services and value provided by coastal mangrove communities are a tremendous economic driver to the local economy. In Lee County alone the estuary contributes \$3 billion to the economy and is responsible for 124,000 jobs.

The game fish industry is dependent upon healthy mangrove and seagrass systems. Current fishing license revenue from Lee County alone generates **\$3.2 million** dollars a year according to FWC. The financial benefits our natural resources contribute to the state are substantial.

The economic contribution of these natural systems in Lee County's coastal estuary has been quantified in studies by Dr. Richard Weisskoff and Jim Beaver. The economic contribution of mangrove ecosystems are estimated at \$2.5 billion dollars with an additional \$2 billion dollars provided by seagrass habitats and \$1 million dollars of value provided by oyster reefs.

The Eden Oak proposal does not provide competent substantial evidence that it is consistent with the following Lee Plan goals and objectives:

Element GOAL 158: Lee County will achieve and maintain a diversified and stable economy by providing a positive business climate that assures maximum employment opportunities while maintaining a high quality of life. (Amended by Ordinance No. 00-22)

OBJECTIVE 158.1: Lee County will encourage the conservation and enhancement of those natural and cultural resources that represent the foundation of the county's existing retirement, recreation, and tourist oriented economy in order to place Lee County in a competitive position to enable the retention and expansion of these and other business opportunities.

POLICY 158.1.7: Lee County will encourage the preservation of sensitive natural resources, including beaches, wetlands, estuaries, clean air and water, historic resources, scenic vistas and other unique natural resources through public acquisition and/or regulatory protection

SCCF Comment: The Eden Oak proposal to eliminate 36 acres of wetlands is in direct opposition to the County's Economic Element Goal 158 as supported by the multiple economic studies. According to the Lee County Visitor and Convention Bureau Performance Dashboard, tourism in Lee County contributed \$3 billion dollars to the economy in 2015 and provides 1 in 5 jobs to the area. The health of the environment and its fishing nurseries plays a major role in the success of the tourism industry in Lee County. The destruction of mangroves and wetlands directly undermines the health and productivity of Lee County's natural resources

In economic terms mangroves are critical ecosystems that provide "free" services that we could not equally engineer, nor afford if we tried to replace their functions; securing shorelines, absorbing hurricane winds and storm surge, trapping sediments, building land, filtering runoff, absorbing nutrients, providing nursery and feeding grounds for fish and the entire estuarine food web for sport and commercial fisheries.

V. Summary

A rezoning of the Eden Oak development would increase risks to public health and safety from storm surge, flooding and reduce evacuation capacity for current residents. The project will

eliminate 36 acres of critical, productive wetland habitat that provide protection and are critical habitat for numerous threatened and endangered species and species of special concern.

"Offsite" mitigation of impacts in another basin will not protect the residents from the effects of a storm and will not protect the aquatic nursery in the lower Caloosahatchee estuary that fuels our local fishing and tourism industry. Further, the development works against Lee County's interest and investment in addressing the impaired condition of the Caloosahatchee to meet state standards. None of which this project will "mitigate" but it will exacerbate the damage and erosion of resources.

Thank you for your careful review and consideration of this development and its impact to our community.

Sincerely,



Rae Ann Wessel, Natural Resource Policy Director
Sanibel Captiva Conservation Foundation

Citations:

Lee County Visitor and Convention Bureau Website – Performance Dashboard

<http://www.leegov.com/performance/visitorconventionbureau>

Lee County Public Safety Website – Hurricane Irma Press Release

http://www.leegov.com/publicsafety/News%20Documents/3-28-18_Lee%20Co%20receives%20national%20recognition%20for%20Irma%20work.pdf

Beever III, J.W. , R.R. Lewis III, L. Flynn, T. Tattar, E.J. Neafsey, and L. Donley 2016. Identifying and Diagnosing Locations of Ongoing and Future Saltwater Wetland Loss and Death from the Hydrologic and Biogeochemical Impacts of Climate Change and Human Impoundment With a Treatment Protocol for Restoration of Afflicted Areas, Charlotte Harbor National Estuary Program, Technical Report 16-3, 213 pages

FL Fish and Wildlife Conservation Commission - Economics of Fish and Wildlife Recreation

<http://myfwc.com/docs/AboutFWC/Economic/EconomicsOfFishWildlifeRec2010.pdf>

U.S. Department of Commerce, Bureau of Economic Analysis report on Outdoor Recreation

<https://www.bea.gov/newsreleases/industry/orsa/2018/pdf/orsa0218.pdf>