

SFWMD

Land Assessment

West Coast Region

Additional Public Comments



Dedicated to the preservation and stewardship of the water resources and natural communities in and around the Corkscrew Regional Ecosystem Watershed

May 23, 2013

CREW Land & Water Trust
23998 Corkscrew Rd, Estero, FL 33928

RE: SFWMD Land Use Assessment - CREW

On behalf of the Board of Trustees for the CREW Land and Water Trust, we encourage the SFWMD to retain the CREW Project in its entirety. Thanks to funding from the federal, state and local levels along with various agencies, NGO's, and private landowners, there are currently over 45,000 acres in preservation of the 60,000-acre Corkscrew Regional Ecosystem Watershed. We still have some land to acquire in order to protect the largest intact watershed in southwest Florida.

The CREW Project has taken over 2 decades to get to this point and has certainly been a worthy investment. The functions of this invaluable resource includes aquifer recharge, natural flood protection, fish & wildlife habitat, natural filtration for removing pollutants and recreational areas. The connectivity of CREW with Corkscrew Swamp Sanctuary and other protected lands has been extremely important in providing the habitat needed for many species. The environmental and financial benefits of preserving this watershed are vast.

Your staff has done an outstanding job in managing the CREW lands! Restoration to restore the hydrology, exotics removal, and prescribed burning are just a few management tools your staff has utilized that has greatly enhanced the natural ecosystems which has historically been important habitat for woodstorks, Florida Panthers, Black Bears and many other species. Currently work is being done in Southern Critical CREW to restore these natural systems which will ultimately aid water storage and flood control.

The CREW Land & Water Trust sincerely appreciates the dedication and cooperation we enjoy from the SFWMD and we will continue to strongly support the preservation and protection of CREW.

Thank you for your consideration,

Brenda Brooks
Executive Director
CREW Land & Water Trust

West Coast Assessment Region Form
Michael Duever, 985 Sanctuary Rd. Naples, FL 34120
239-304-1847 (mikeduever@naples.net)

Caloosahatchee Water Quality Facility

Which assessment unit or parcel do these comments address?

All

What describes your primary interest?

**Water Quality, Water Supply, Flood Control, Natural System Restoration,
Threatened and Endangered Species, Growth Management and Land Use**

Have you visited this site in the last two years?

Yes

What type of activity do you most frequently participate in on this property?

Bird Watching and Wildlife Viewing

In your opinion, how well does the current use of the property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

The property was acquired as part of a plan to benefit all of the District's core missions as related to improving management of the Caloosahatchee River and its adjacent lands. Its primary purpose is to improve water quality in the Caloosahatchee River, but it will also contribute to flood control and to water supply during dry periods. This site is an extremely important component of the Southwest Florida Comprehensive Watershed Plan, which is the southwest Florida counterpart of the Restudy for southeast Florida. It is one of the few locations where a corridor still exists across the Caloosahatchee River that connects natural areas used by the Florida panther and other wildlife. Maintenance of this connection significantly contributes to the viability of terrestrial wildlife populations living north and south of the Caloosahatchee River. There are some

portions of the property that could also provide valuable natural habitat as was described in the District's public workshop on May 22.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

The purposes described above were the basis for acquisition of the property and represent the best use of the property. Apparently, there currently is an agreement with one or more southwest Florida counties to allow development of portions of this property along SR 80. Given the importance of this site as a wildlife corridor and its limited width, this proposed development should be transferred to adjacent parcels.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

The purposes described above were the basis for acquisition of the property and represent the best use of the property. Apparently, there currently is an agreement with one or more southwest Florida counties to allow development of portions of this property along SR 80. Given the importance of this site as a wildlife corridor and its limited width, this proposed development should be transferred to adjacent parcels.

West Coast Assessment Region Form
Michael Duever, 985 Sanctuary Rd. Naples, FL 34120
239-304-1847 (mikedyever@naples.net)

C-43 Reservoir

Which assessment unit or parcel do these comments address?

All

What describes your primary interest?

**Water Quality, Water Supply, Flood Control, Natural System Restoration,
Threatened and Endangered Species, Growth Management and Land Use**

Have you visited this site in the last two years?

No

What type of activity do you most frequently participate in on this property?

None

In your opinion, how well does the current use of the property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

The property was acquired as a part of a plan to benefit all of the District's core missions as related to improving management of the Caloosahatchee River. Its primary purpose is to improve seasonal flows to the Caloosahatchee estuary by moderating excess releases from Lake Okeechobee and supplementing low dry season flows. The associated improvement in water quality will also significantly improve the health of the estuary and its biota. There are several parcels adjacent to the C-43 reservoir, which are not currently considered crucial to its operation. However, it would seem smart to not dispose of these properties until the reservoir is operational, and there is greater certainty that they won't have a useful role, either directly for operation of the reservoir or indirectly for their value for public use.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

The purposes described above were the basis for acquisition of the property and represent the best current use of the property.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

The purposes described above were the basis for acquisition of the property and represent the best current use of the property.

West Coast Assessment Region Form
Michael Duever, 985 Sanctuary Rd. Naples, FL 34120
239-304-1847 (mikedyever@naples.net)

Okaloacoochee Slough

Which assessment unit or parcel do these comments address?

All

What describes your primary interest?

**Recreation and Public Use, Water Quality, Water Supply, Flood Control,
Natural System Restoration, Threatened and Endangered Species, Growth
Management and Land Use**

Have you visited this site in the last two years?

Many Times

What type of activity do you most frequently participate in on this property?

**Hiking, Bird Watching and Wildlife Viewing, Picnics, Scientific Research,
Educational Tours**

In your opinion, how well does the current use of the property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

The current uses of the property are an excellent example of a site that supports all of the District's core missions. The maintenance of a natural hydrologic regime in the headwaters of the Okaloacoochee Slough provides water storage that reduces peak flows off the area during storms, recharges groundwater aquifers, maintains downstream flows during drier periods, and provides high quality water for downstream uses. The natural hydrologic regime also helps to maintain a natural fire regime, both of which are crucial to supporting the natural resources on the site. As a result, Okaloacoochee Slough supports one of the healthiest natural plant

and animal communities found anywhere in South Florida. This site is also an important component of the Southwest Florida Comprehensive Watershed Plan, which is the southwest Florida counterpart to the Restudy for southeast Florida. It is part of a crucial hydrologic and wildlife corridor connecting large natural areas to the south with extensive undeveloped lands north of the Caloosahatchee River. Maintenance of this connection significantly contributes to the long term viability of numerous wildlife populations in southwest Florida, as well as maintaining natural flowways through the area.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

The purposes described above were the basis for acquisition of the property and represent the best use of the property.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

The purposes described above were the basis for acquisition of the property and represent the best use of the property.

West Coast Assessment Region Form

Michael Duever, 985 Sanctuary Rd. Naples, FL 34120

239-304-1847 (mikedyever@naples.net)

Corkscrew Regional Mitigation Bank

Which assessment unit or parcel do these comments address?

All

What describes your primary interest?

Recreation and Public Use, Water Quality, Water Supply, Flood Control, Natural System Restoration, Threatened and Endangered Species, Growth Management and Land Use

Have you visited this site in the last two years?

Yes

What type of activity do you most frequently participate in on this property?

Bird Watching and Wildlife Viewing

In your opinion, how well does the current use of the property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

The current uses of the property are an excellent example of a site that supports all of the District's core missions. Its contribution to maintaining a natural hydrologic regime in the headwaters of the Corkscrew Swamp and Estero River watersheds provides water storage that reduces peak flows off the area during storms, recharges groundwater aquifers, maintains downstream flows during drier periods, and provides high quality water for downstream uses. The natural hydrologic regime also helps to maintain a natural fire regime, both of which are crucial to supporting the natural resources on the site. While a relatively small area, this site is also a component of the Southwest Florida Comprehensive

Watershed Plan, which is the southwest Florida counterpart to the Restudy for southeast Florida. It is part of a proposed hydrologic and wildlife corridor connecting the Corkscrew Swamp and Estero River watersheds. Maintenance of these types of connections significantly contributes to the long term viability of numerous wildlife populations in southwest Florida, as well as maintaining natural flowways through the area.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

The purposes described above were the basis for acquisition and restoration of the property and represent the best use of the property.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

The purposes described above were the basis for acquisition and restoration of the property and represent the best use of the property.

West Coast Assessment Region Form
Michael Duever, 985 Sanctuary Rd. Naples, FL 34120
239-304-1847 (mikedyever@naples.net)

Six Mile Cypress Slough

Which assessment unit or parcel do these comments address?

All

What describes your primary interest?

**Recreation and Public Use, Water Quality, Water Supply, Flood Control,
Natural System Restoration, Threatened and Endangered Species, Growth
Management and Land Use**

Have you visited this site in the last two years?

Yes

What type of activity do you most frequently participate in on this property?

**Hiking, Bird Watching and Wildlife Viewing, Scientific Research,
Educational Tours**

In your opinion, how well does the current use of the property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

The current uses of the property are an excellent example of a site that supports all of the District's core missions. Its contribution to maintaining a natural hydrologic regime in a portion of the headwaters of Estero Bay provides water storage that reduces peak flows off the area during storms, recharges groundwater aquifers, maintains downstream flows during drier periods, and improves high quality water for downstream uses. Its natural hydrologic regime also helps to maintain a more natural fire regime, both of which are crucial to supporting the natural resources on the site. While a relatively small area, portions of this site are also a component of the Southwest Florida Comprehensive Watershed Plan, which is the southwest

Florida counterpart to the Restudy for southeast Florida. It is an important hydrologic and wildlife corridor through a generally developed landscape. Maintenance of these types of connections significantly contributes to the long term viability of numerous wildlife populations in southwest Florida

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

The purposes described above were the basis for acquisition of the property and represent the best use of the property.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

The purposes described above were the basis for acquisition of the property and represent the best use of the property.

West Coast Assessment Region Form

Michael Duever, 985 Sanctuary Rd. Naples, FL 34120
239-304-1847 (mikeduever@naples.net)

CREW

Which assessment unit or parcel do these comments address?

All

What describes your primary interest?

Recreation and Public Use, Water Quality, Water Supply, Flood Control, Natural System Restoration, Threatened and Endangered Species, Growth Management and Land Use

Have you visited this site in the last two years?

Many Times

What type of activity do you most frequently participate in on this property?

Hiking, Bird Watching and Wildlife Viewing, Picnics, Scientific Research, Educational Tours

In your opinion, how well does the current use of the property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

The current uses of the property are an excellent example of a site that supports all of the District's core missions. The maintenance of a natural hydrologic regime in the headwaters and main flowways of the Corkscrew Swamp, Picayune Strand, Fakahatchee Strand, and Estero River watersheds provides water storage that reduces peak flows off the area during storms, recharges groundwater aquifers, maintains downstream flows during drier periods, and provides high quality water for downstream uses. The relatively natural hydrologic regime also helps to maintain a natural fire regime, both of which are crucial to supporting the natural resources on the site. The maintenance of relatively natural ecological

processes through this large area results in CREW having one of the healthier natural plant and animal communities found in South Florida. This site is also an important component of the Southwest Florida Comprehensive Watershed Plan, which is the southwest Florida counterpart to the Restudy for southeast Florida. It forms a major hydrologic and wildlife corridor connecting the Corkscrew Swamp, Okaloacoochee Slough, and Estero River watersheds. Maintenance of this connection significantly contributes to the long term viability of numerous wildlife populations in southwest Florida, as well as maintaining natural flowways through the area.

There are two small parcels at the south end of Camp Keais Strand. While they may be difficult to manage, management of Camp Keais would be even more difficult if these parcels became private property. They should be managed as part of the larger Camp Keais Strand by the public or private conservation entities that have the responsibility for managing the lands in this area.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

The purposes described above were the basis for acquisition of the property and represent the best use of the property.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

The purposes described above were the basis for acquisition of the property and represent the best use of the property.

West Coast Assessment Region Form
Michael Duever, 985 Sanctuary Rd. Naples, FL 34120
239-304-1847 (mikedyever@naples.net)

Unassociated Parcels

Which assessment unit or parcel do these comments address?

All

What describes your primary interest?

Recreation and Public Use, Water Quality, Water Supply, Flood Control, Natural System Restoration, Threatened and Endangered Species, Growth Management and Land Use

Have you visited this site in the last two years?

No

What type of activity do you most frequently participate in on this property?

None

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

I am not familiar with most of these sites, and understand that it is likely that there are better uses for some of them. However, the SFWMD and Corps of Engineers have spent over ten years working on the Southwest Florida Comprehensive Watershed Plan (formerly called the Southwest Florida Feasibility Study), which is the southwest Florida counterpart to the Restudy for southeast Florida. At the District's Land Assessment public workshop on May 22, it was mentioned that the District staff were not familiar with this effort. One of the most important aspects of the Comprehensive Watershed Plan was identifying hydrologic and wildlife corridors in southwest Florida. It would be extremely important for the land assessment process to determine whether any of the parcels being

reviewed are components of some of these proposed corridors. Corridors do not necessarily have to be pristine lands. It is often enough that they just do not become residential, industrial, or commercial developments with a strong human presence. Maintenance of these corridors can significantly contribute to the long term viability of numerous wildlife populations in southwest Florida, as well as maintaining natural flowways through the area.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

A thorough review of each of these parcels in terms of whether they may be important to the maintenance of hydrologic and wildlife corridors in southwest Florida needs to be done to be certain decisions made about the disposal of these lands do not inadvertently foreclose important opportunities for the future viability of wildlife populations and the maintenance of natural flowways. Information in the Southwest Florida Comprehensive Watershed Plan, which was sent to the District staff following Wednesday's workshop, should provide the basis for this review.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

A thorough review of each of these parcels in terms of whether they may be important to the maintenance of hydrologic and wildlife corridors in southwest Florida needs to be done to be certain decisions made about the disposal of these lands do not inadvertently foreclose important opportunities for the future viability of wildlife populations and the maintenance of natural flowways. Information in the Southwest Florida Comprehensive Watershed Plan, which was sent to the District staff following Wednesday's workshop, should provide the basis for this review.



The mission of the Florida Native Plant Society is to promote the preservation, conservation, and restoration of the native plants and native plant communities of Florida.

May 28, 2013

Ray Palmer, Real Estate Section Leader
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, Florida 33416

Subject: Comments on Comprehensive Assessment of West Coast Region Lands

Dear Mr. Palmer:

Please accept the following comments as the Florida Native Plant Society's recommendations on the West Coast Assessment Region.

Six-Mile Cypress Slough – It would be difficult to overstate the importance of this property as a regionally significant natural feature. It provides quality habitat for a large variety of native flora and fauna, plays a critical role in maintaining water quality in Estero Bay, and is a magnet for recreational use and environmental education. The education center is a major asset to the people of the surrounding area. The District's ownership, in combination with the contiguous lands also under public ownership, protect the core of the slough and ownership. The non-contiguous parcels located outside the forested floodplain of the Slough should be evaluated individually to determine if they also play a role in protecting critical parts of the watershed, supporting native flora and fauna, and/or should be transferred to Lee County ownership.

C-43 Reservoir - Although the great majority of the C-43 Reservoir lacks significant natural resource values in its current condition, the planned Reservoir will provide important water management benefits to the Caloosahatchee River and, more broadly, to the entire Everglades system. The District's assessment states that parts of the property are located outside the projected footprint of the future reservoir; however, the District should not surplus any of the land area until such time as reservoir construction has been completed and a more definitive determination can be made about the potentially surplus status of peripheral parcels, including the so-called North of the Project Parcels. All of the parcels, including those that lie outside the presumptive footprint of the Reservoir, may play an important role in accommodating the construction and future maintenance of the Reservoir.

Corkscrew Regional Mitigation Bank – This property's designation as a mitigation bank requires that it, and the mitigation wetlands that will be constructed on it, must be protected in perpetuity. This is best accomplished through continued public ownership. Retaining public ownership and completing the mitigation will also contribute to the long-term water management value of the neighboring Imperial Marsh Mitigation Project.

CREW – The District's acquisition and management of the CREW lands represents a remarkable achievement. The superlative water management and habitat values of these lands must preclude any consideration of surplus sales. Even the disjunct Camp Keais Strand Outparcel merits retention for its stand-alone natural values. Although access constraints limit the District's

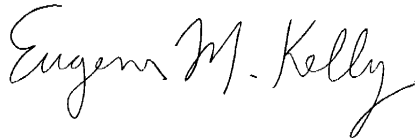
Florida Native Plant Society
Post Office Box 278, Melbourne, FL 32902
Telephone: 407.862.8172

ability to manage Camp Keais in the same superlative manner that it has managed the larger tracts to the north, the potential remains that additional land purchases will enhance access in the future. The CREW project remains a work-in-progress. We strongly recommend that the District continue to pursue the purchase of additional lands within the project area, including potential fee title purchases within the stewardship easement lands to the extent necessary to accommodate access for effective water resource and habitat management, and secondarily to accommodate compatible recreational use by the public.

Okaloacoochee Slough – Like CREW, the Okaloacoochee Slough State Forest is one of South Florida's most important natural areas. As the headwaters for the Fakahatchee Strand and Big Cypress wetland systems, it is a critical link in the hydrology of the Everglades system. Also like CREW, there are unprotected contiguous lands that would make logical additions to this large complex of public lands. We recommend that the District consider expanding the project area for Okaloacoochee, and pursue additional acquisitions, rather than entertain a proposal to surplus any portion of the existing ownership.

Thank you for considering our concerns. We look forward to continuing participation in the District's review of its lands.

Respectfully,

A handwritten signature in black ink that reads "Eugene M. Kelly". The signature is written in a cursive, flowing style.

Eugene M. Kelly, Policy Chair
Florida Native Plant Society
Policy@fnps.org

From: [Palmer, Ray](#)
To: [Schluter, Andrea](#)
Subject: FW: Land Assessment meeting of May 22
Date: Friday, May 24, 2013 2:38:33 PM

Please add this email to the Region 4 public comments.

From: Mary Tracy Sigman [mailto:sigman101@yahoo.com]
Sent: Friday, May 24, 2013 2:23 PM
To: Palmer, Ray
Cc: Rae Ann Wessel
Subject: Land Assessment meeting of May 22

Dear Ray,

We spoke briefly after the meeting on Wednesday, and I mentioned that I am not affiliated with any particular environmental group or such, but am an average citizen. My partner and I moved to Fort Myers almost 4 years ago from the Chicago area. I am still learning about this area and this wonderful state. What I would like to say for the record is that it was very apparent from the meeting that there does not appear to be any surplus land in the holdings of SFWMD, but, if anything, there seemed to be a need for more land, especially parcels adjoining or connecting present holdings, to be purchased or obtained.

Water is critical to all living things. Water surrounds and infiltrates this entire state. Our resources have been tapped and tarnished for too long. Hopefully we can work together to preserve and improve the water we now have.

Sincerely,
Mary Tracy Sigman
15551 Shell Point Bl
Fort Myers, FL 33908

Community Association of Caloosa Shores, Inc.
14801 Palm Beach Boulevard Ste 100
Fort Myers FL 33905
239-728-5481

May 22 2013

RECEIVED

Via email and USPS

MAY 30 2013

Mr. Ray Palmer
Real Estate Section Leader
3301 Gun Club Road MSC 5210
West Palm Beach FL 33406

LAND MANAGEMENT
SECTION

Ref: (A) West Coast Assessment Region – Unassociated Parcels – Caloosa Shores
(B) Letter to SFWMD from Mr. John Jay Watkins dated May 14 2013, same subject

Dear Mr. Palmer:

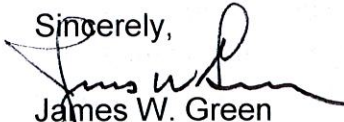
In addition to the parcel referenced above, SFWMD owns a 60 acre riverfront parcel to the south of Caloosa Shores Drive containing certain test wells, PID 1-28-43-12-A00-0001.0000. I understand an easement exists running from the northern portion of this parcel westward to CR 78, providing legal access although not physical access. Neither parcel currently enjoys legal physical access.

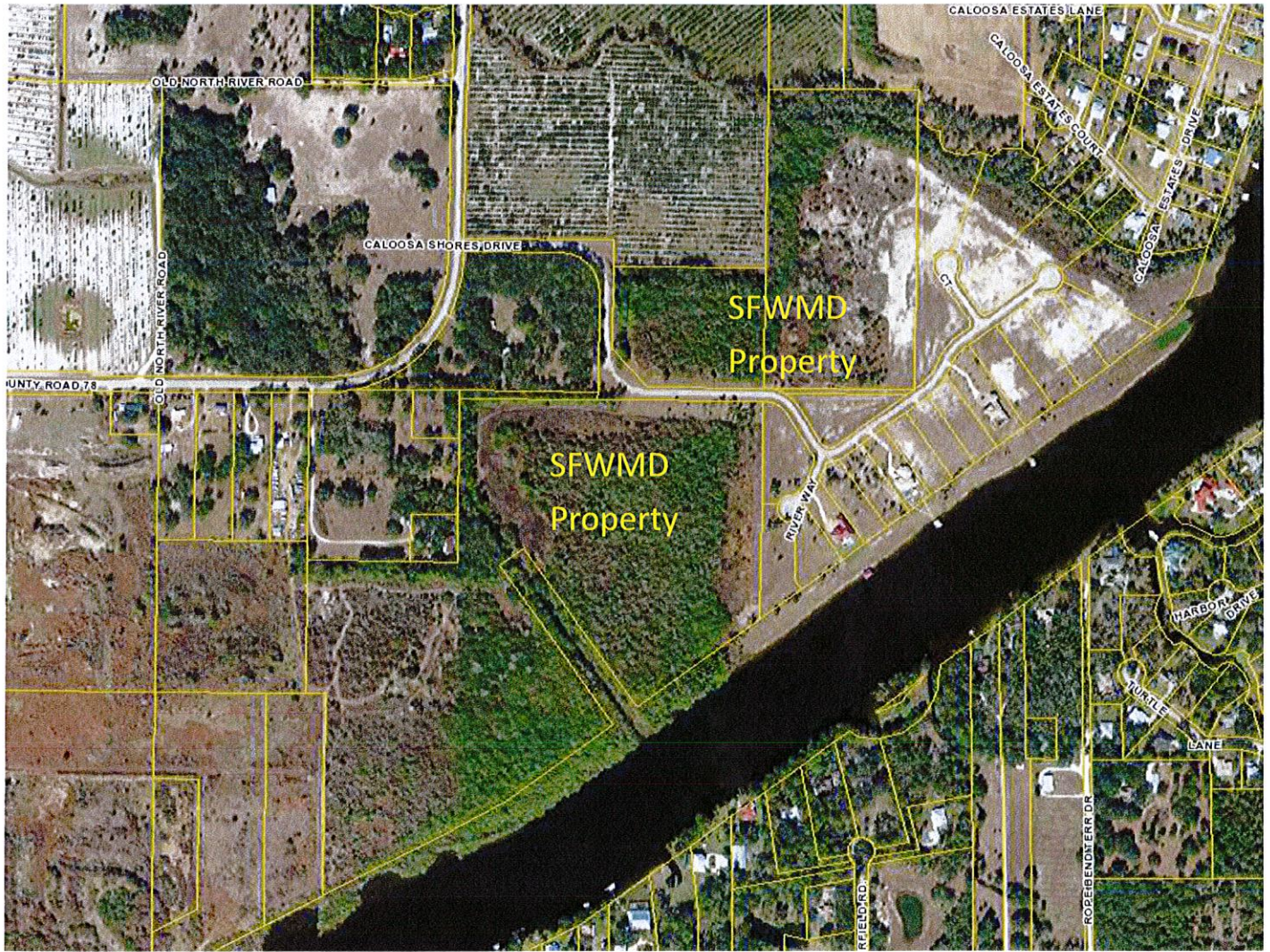
We recommend both parcels remain in SFWMD (or similar entity) inventory and their environmental contribution be considered together for improvements to water quality, hydrology and habitat. Removal of exotics is an additional recommendation. Together the parcels create a wildlife path between Bee Branch Creek and areas farther north to the river. Animals are frequently seen crossing between the two parcels.

The Association would be willing to enter into negotiations with SFWMD to provide legal physical access to both properties via Caloosa Shores Drive with the future use and ownership of the parcels as a consideration.

We look forward to partnering with SFWMD to arrive at mutually beneficial arrangements.

Sincerely,


James W. Green
President



Comments on the South Florida Water Management District's
Proposed Surplus Land Review: West Coast Assessment Region
Prepared by Richard A. Hilsenbeck, Ph.D.
Florida Chapter of The Nature Conservancy

Caloosahatchee Water Quality Treatment and Testing Facility

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

While this property was acquired to test nutrient removal technologies to help clean water flowing into the Caloosahatchee River, it also has other important functions and a strategic location. Nutrient pollution (particularly nitrogen and phosphorus) and excessive fresh water inputs into the estuarine systems along Florida's southwestern coast (e.g., San Carlos Bay) have caused extensive damage to these estuaries and the economically important fisheries – and recreational aspects – they support. As such, more research directed at solving these problems is critical and this property is vital to that effort. But this property is also located in an area known to be utilized by Florida panthers crossing the Caloosahatchee River in search of additional territory north of the river. Considerable funds have recently been spent to protect lands just east of this facility/property and the District's land can also play a role in providing the needed lands for a Florida panther dispersal corridor in this region. As such, it seems short-sighted to state that, "Most of the road frontage area along SR 80 is intended to be made available for surplus in the near future pursuant to the terms of the acquisition." If this surplus agreement was indeed part of the terms of the acquisition then it is herein suggested that a conservation easement be put in place over any lands to be surplus prior to their sale to conserve both open, improved pasture habitats (utilized by many species of wildlife – such as crested caracaras and other avifauna) and to maintain a core holding of conserved lands near the Ortona Locks that can contribute to a Florida panther corridor. As may also be noted, some of the intact (in terms of natural communities – such as Mesic Hammock and freshwater Marsh systems) lands along the Caloosahatchee River rank very high in terms of Strategic Habitat Conservation Areas and Potential Habitat Richness (for various focal species).

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

No, but see comments that might pertain to this question in the answer above.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

No, but see comments that might pertain to this question in the answer above.

C-43 Reservoir

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

Although many in the conservation community are not major proponents of large reservoirs to treat – and therefore improve – water quality (and store water – i.e., quantity), and would rather see dispersed storage options and the restoration of natural wetlands employed to perform the same function/job, the C-43 Reservoir is a necessity. The reservoir is being designed for environmental water supply benefits to the Caloosahatchee Estuary that will reduce the salinity and nutrient impacts of runoff to the

estuary and provide some flood attenuation. These are, obviously, core missions of the District and are very much needed in southwest Florida. The Caloosahatchee River (C-43) West Basin Storage Reservoir Project was initiated under the Water Resources Development Act (WRDA) of 2000. The reservoir will be located in the C-43 Basin which spans Hendry, Glades, Charlotte, Collier, and Lee counties. This project is designed to capture C-43 Basin runoff and releases from Lake Okeechobee, and as such, is vital to creating a more natural water balance throughout the region. The reservoir may also provide wildlife habitat for numerous water and wading bird species.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

Perhaps, because as noted in material provided on the District's website it states that, "Project planning has determined that the footprint of the reservoir project will not cover all of the land that is owned. There are two parcels of citrus land between the project area and SR 80 that will not be needed for the project." Provided that this statement is still valid, it appears that surplus of the two citrus groves between the project area and S.R. 80 may be warranted.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

No, but see comments that might pertain to this question in the answer above.

Okaloacoochee Slough

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

The Nature Conservancy was instrumental in the identification, submission for public funding to protect this project area and the acquisition of the Okaloacoochee Slough project. We know very well the natural resource attributes and watershed characteristics of this property – i.e., headwaters of Fakahatchee Strand – and its strategic location in the landscape of southwest Florida. As well, the project is extremely important for wildlife conservation in the region, including for Florida panthers, and in our opinion this property is absolutely not suitable for any kind of surplus designation (other than possibly donating it to the TIITF and current managers of the property, the Florida Forest Service and the Florida Fish and Wildlife Conservation Commission). In this regard, it is also noted that the majority of the property is held jointly (i.e., shared title) between the District and the State of Florida. Likewise, the state forest was purchased under the Conservation and Recreation Lands (CARL) Program using Preservation 2000 and Save Our Rivers funds and is likely subject to restrictive bond covenants under these programs.

In terms of District's core mission values, as noted in the materials provided on the District's website, this property, "... is a 13,000 acre slough that is oriented north-south and runs through pinelands and cypress swamp. Fakahatchee Strand and the Big Cypress Preserve are dependent on the water supplied by the Okaloacoochee Slough. The area supports natural systems restoration and protection, provides natural storage of water, helps mitigate flood damage through its storage capacity, and supplies clean water to downstream areas." The property also supports a variety of recreational uses including hiking and bicycling on the forest roads, fishing spots, wildlife viewing and hunting.

Much of the property is extremely wet and seasonally inundated. As well, most of it is within a FEMA "A" Flood Zone Area and is not suitable for development, farming or other kinds of intensive agriculture. The property represents an extremely valuable wetland and headwater conservation land and should

not be surplus or otherwise removed from conservation protection now afforded by the District and the State of Florida. In summary, Okaloacoochee Slough is a vital hydrological and wildlife habitat resource for southwest Florida.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

No, but see comments that might pertain to this question in the answer above.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

No, but see comments that might pertain to this question in the answer above.

Six Mile Cypress Slough

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

In terms of the District's core mission values, Six-Mile Cypress Slough is a regionally significant flow way that runs through a densely developed area of western Lee County. The slough is an important water-quality feature that helps buffer and clean urban storm water runoff before it enters the economically important and productive (recreation and fisheries) Estero Bay estuarine system. As well, the property provides significant areas of habitat for a variety of wetland species. The property additionally scores highly under most of the statewide environmental criteria routinely utilized to rank and evaluate the ecological significance of properties (and 100% falls within a FEMA "A" Flood Zone Area. Because the property was purchased under the Conservation and Recreation Lands (CARL) Program using Preservation 2000 and Save Our Rivers funds, it may be subject to restrictive covenants that greatly limit the surplus of this value tract.

Since the property is managed by Lee County and provided numerous important functions (including meeting District core mission values) there is no need – economically or ecologically – to surplus this property. Consideration, however, may be given to donating the property to either the State of Florida or Lee County. It is also of note that the property has the highest visitation of any District-owned land and that the site contains an education center that the District helped fund, and a boardwalk through a portion of the wetlands. As such, this appears to be an extremely valuable property for the citizens of Florida to be able to visit and enjoy, not to mention the ecological benefits (i.e., ecosystem services) it provides.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

No, but see comments that might pertain to this question in the answer above.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

No, but see comments that might pertain to this question in the answer above.

Corkscrew Regional Ecosystem Watershed (CREW)

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

This is one of the most important holdings of the District in southwest Florida in terms of water supply for the citizens, agricultural- and industrial-interests and natural systems and wildlife in the region. In terms of meeting the District's core mission values, CREW is a regionally significant wetland system. It lies in a large hydrologic basin and serves as the headwaters of the Imperial River and to Picayune Strand. The Southern CREW project area is critical for aiding in water storage, natural systems restoration and flood control within the region. Ongoing land management and restoration activities have made the site a very diverse natural system of cypress swamps, wet flatwoods, marsh, and wet prairies. The western portion has been brought back from what had been a heavily infested *Melaleuca* (pork tree) monoculture that had substantially degraded the ecological and economic resources of the area. The area is vital habitat for wood stork, Florida panther (both listed as federally endangered) and Florida black bear.

The property is managed by the District in concert with the Florida Fish and Wildlife Conservation Commission as a cooperating agency. The CREW Land and Water Trust provides education and outreach services on the property through a contract with the District. CREW provides numerous and varied recreational opportunities for hiking, bicycling, primitive camping, hunting, geocaching, and wildlife viewing. There are three primary public use areas with developed facilities: the Corkscrew Marsh unit with boardwalks, marked trails, a raised observation deck, and an observation tower; the Bird Rookery Swamp trail system and boardwalk; and the Cypress Dome trailhead with marked trails. Because of the significance of the CREW lands to the well-being of the citizens of Florida – and regional water supplies and wildlife – this area should not be considered in any way for surplus.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

No, but see comments that might pertain to this question in the answer above.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

No, but see comments that might pertain to this question in the answer above.

Corkscrew Regional Mitigation Bank

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

The area supports natural systems restoration by providing mitigation for impacts to wetlands, in accord with stated District core mission values. The goal of the project is to restore historic wetland function through hydro-period restoration, invasive exotic species removal and controlled burns. The area borders the Imperial Marsh mitigation project and therefore expands the amount of protected lands in the area. The area is managed by EarthMark, a privately-held company, until all of the credits are sold and restoration success is achieved. Because proceeds from the sale of credits are shared with the district to fund other land management needs and the long-term management of the property, it might be that another manager could be found to maintain the property as a conservation and water resource holding in perpetuity.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

Not necessarily, but see comments pertaining to this question in the answer above.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

Not necessarily, but see comments pertaining to this question in the answer above.

Unassociated Parcels

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

According to information on the District's own website, these are parcels were not acquired for any restoration or water resource project. Of the tracts in this category (all bordering or near the Caloosahatchee River) apparently ten of them were acquired as potential dredge spoil sites for the U.S. Army Corps of Engineers (ACOE). The District holds the title to these properties but the ACOE has released them, meaning they no longer need them for dredge spoil storage. If the District's own (internal) analyses demonstrate that these lands are not needed for various water resource (quality and quantity) projects, perhaps the larger of the tracts – i.e., North River Road, Kirby Thompson Road, Lyndhurst Lane – could be sold to adjacent landowners with retained conservation easements that will maintain most of their natural and hydrological resource values while allowing some low intensity agricultural uses (e.g., cattle grazing) and the construction of one single family residence.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

Yes, for some. Given their often small size, overall scant resource values and frequent infestations with exotic species (mostly Brazilian pepper), coupled with the fact that they are not closely adjacent to any other conservation lands in the region, most of the tracts appear suitable for possible surplus. These would likely include the Center Street, Goggin Road, Spanish Creek Road, Linwood Road, Duke Highway, Lippincott Road, Trout Creek and Haven's Island tracts.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

Perhaps. Three tracts – Calusa Shores, Quail Run and Robb Road – might have some utility in helping to forge a Florida panther corridor on the north side of the Caloosahatchee River and so should be treated as lands with the potential for future conservation implications and likewise surplus only with retained conservation easements. Only one tract – the so-called I-75 Parcel – might be retained in fee simple ownership and either sold or donated to Lee County since it is surrounded by the County's Caloosahatchee Creeks Preserve (at least they should be approached about taking title and management responsibilities).

Pete Quasius, on behalf of the Snook and Gamefish Foundation.

The Snook and Gamefish Foundation finds that virtually all of the SFWMD holdings in Southwest Florida have uses directly related to District core missions. We are supportive of transfer of parcels to other public entities to facilitate management or development for wildlife habitat, water management or recreation and understand that construction of water management projects is a long and expensive process. We are particularly supportive of transfers to the Lee County Conservation Lands program, and to the Department of Interior as part of an expanded footprint for the Caloosahatchee National Wildlife Refuge. We are strongly opposed to the surplusing to non-public entities of any water front parcels, no matter how small, since each has potential habitat and access roles. We make exception for transfer to existing homeowners, at appraised value; those CORPS spoil easements directly in front of their homes. Ideally we would like to see those transfers include mandates to maintain a living shoreline and appropriate best shoreline management practices.

The Foundation is very supportive of the CREW project because of its significant contribution to the water management that enhances the fishery habitat of Estero Bay and its tributaries and the 10,000 Islands.

We understand that there are some agreements with Glades and Lee County Commissioners to offer some portions of lands purchased at BOMA, with highway frontage and commercial value, purchased for water management projects and not needed for the current design footprint of the BOMA water treatment project and do not object to that sale if compact and market driven. We encourage the district to make maximize wildlife utilization of this important corridor location in the project design. We also support the transfer of the waterfront section of the BOMA property, not need for the treatment and storage project, to an appropriate public entity to maximize its important wildlife habitat and recreational values.

We feel that there is potential for utilization of both parcels of purchase footprint of C43/Berry Grove site in Hendry County for future water treatment, storage, habitat and recreation and think it is appropriate to re evaluate use of those lands after designed projects have been constructed and operated and other development in the area envisioned by filed sector plans has occurred. The site for at the associated aquifer storage and recovery arrays ASR array for the project has not yet been determined. There are also spoil site parcels in Hendry County which may become useful to the public as the planned development of the area takes place. We again urge that reevaluation of these parcels be postponed until it is clearer what will happen to adjacent lands. We note that long term there might be an additional role of aquifer storage and recovery arrays in Southwest Florida given the success of test projects in South Florida. Because of the small surface land foot required for these projects, we again suggest that some parcels may have value as ASR project sites and should not be surplus until the ARS project is more fully developed.

We support interim use of all appropriate parcels for water storage and flow attenuation, particularly the use of the C-43 reservoir site until the reservoir is constructed. We also support interim use of

district land for cattle leases, again at market rates and without impediments to construction of the designed project.



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

May 28, 2013

Ray Palmer
Real Estate Section Leader
Land Resources Bureau
3301 Gun Club Road, MSC 5214
West Palm Beach, FL 33406

RE: Comments on SFWMD West Coast Land Assessment Portfolio

Dear Mr. Palmer:

The Conservancy of Southwest Florida on behalf of our over 4,500 members in Collier, Lee, Charlotte, Hendry and Glades counties submits the following comments on the South Florida Water Management District's (SFWMD) West Coast Land Assessment Portfolio. Our members rely upon the good stewardship of District owned lands for water supply and quality, flood protection, and other natural resource benefits, including some recreational opportunities - many of which were acquired in partnership with other organizations and interests. The Conservancy commends the SFWMD for the dedicated acquisition and management of the properties and encourages the District to approach these land assessments with a view towards not just the current status of the properties, but what future natural resource and flood control benefits can be derived from the management and use of these public lands.

Caloosahatchee Water Quality Treatment and Testing Facility

In your opinion, how well does the current use of the property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration? (2000 characters):

The primary future use of this property is to aid and improve water quality protection. The project planned for the site will also protect and restore key natural resources in the Caloosahatchee River and Estuary such as seagrasses and critical habitat for endangered species. Therefore, this property meets the District's core mission exceptionally well. In addition, the property also facilitates an important wildlife corridor across the Caloosahatchee for the endangered Florida panther, and has been identified as crucial in the Southwest Florida Comprehensive Watershed Plan, formerly known as the Southwest Florida Feasibility Study.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions? (2000 characters):

In the interim until the facility is constructed, the Conservancy believes that other activities, such as dispersed storage, are certainly another beneficial use of the property which would meet the core mission of the District and help alleviate some of the water storage issues along the Caloosahatchee during the rainy season.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues? (2000 characters):

No. However, the areas along Route 80 should be retained, and not allowed to be developed as indicated by the West Coast Land Assessment Portfolio, in order to maintain the existing wildlife corridor in as intact a form as possible, to continue to fully meet the District's natural resources protection core mission criteria.

C-43 Reservoir

In your opinion, how well does the current use of the property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration? (2000 characters):

The future use of this property is to provide storage for the Caloosahatchee during the rainy season, and therefore meets the District's core missions of flood control and water supply. C-43 also meets the criteria for natural resource protection and restoration since the storage capability of C-43 is intended to help alleviate the stress to important natural resources such as seagrasses in the Caloosahatchee River and Estuary during high and low flow events.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions? (2000 characters):

Any portion of the property not used for the Reservoir should be used to construct a water quality component to more effectively address the Caloosahatchee water supply and quality issues. There are currently two Total Maximum Daily Loads (TMDLs) addressing nutrient loading to the estuary and tributaries of the Caloosahatchee. The estuary TMDL has already been developed, along with a Basin Management Action Plan (BMAP), while the Caloosahatchee tributary TMDL is still in the modeling phase. Both TMDLs and BMAPs will require significant nutrient load reductions to address the impairments in the fresh and estuarine portions of the river and associated watershed. Therefore, the water which will be stored in the C-43 reservoir should receive treatment before being released back into the Caloosahatchee and any portion of this site that is in excess of what is needed to construct the Reservoir itself should be retained for such purpose.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues? (2000 characters):

No. However, in response to suggestions that a portion of the site be used for recreational purposes, the Conservancy believes the best use of those lands in serving the public's interests would be the District using the northern portion to expand the Reservoir's capabilities for either water quality treatment or greater storage.

Okaloacoochee Slough

In your opinion, how well does the current use of the property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration? (2000 characters):

The Okaloacoochee Slough is an extremely important water flowway and the continued maintenance and protection of the slough provides water quality improvements, recharging of aquifer water supplies, flood protection and ecological benefits to surrounding communities. It particularly is important to maintaining flows to the downstream Fakahatchee Strand and Big Cypress Preserve as well as habitat restoration and connectivity for listed species and other wildlife. The Slough also provides many recreational opportunities, such as hiking and wildlife viewing, for citizens to explore this significant natural area corridor and hydrological connection. Therefore, this property meets all of the District's core mission criteria.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions? (2000 characters):

No, the Slough is being maintained and managed in accordance with the most effective use of the property: as a significant hydrologic and natural areas connection.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues? (2000 characters):

No. However, more land could be acquired adjacent to what is already in District ownership to provide further protection and buffer for the Okaloacoochee Slough.

Six-Mile Cypress Slough

In your opinion, how well does the current use of the property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration? (2000 characters):

The current use of the property is directly in line with the District's core mission. It provides an essential water flowway and natural area directly through an urbanized portion of Lee County – contributing to flood control, water quality and supply and natural resources protection. It

comprises part of the headwaters to the Estero Bay and provides water storage for surrounding areas. According to the District's West Coast Land Assessment Portfolio, it is the most visited of all the SFWMD owned properties and is therefore an exceptionally valuable recreational property.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions? (2000 characters):

No. The property's current use meets all the District's core mission goals and is the most effective use of the property.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues? (2000 characters):

No. The property's current use meets all the District's core mission goals and is the most effective use of the property.

Corkscrew Regional Ecosystem Watershed (CREW)

In your opinion, how well does the current use of the property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration? (2000 characters):

The Corkscrew Regional Ecosystem Watershed is an essential project for meeting the South Florida Water Management District's (SFWMD) core mission by providing water storage, flood control and natural systems restoration as outlined below.

CREW is vital to the restoration and preservation of one of the last remaining intact watersheds south of Lake Okeechobee and is an absolutely essential component in the overarching regional goals of restoring the hydrological connection between CREW, the Camp Keais Strand, and Fakahatchee Strand to the south. The Florida Department of Environmental Protection (FDEP), SFWMD, Lee County, Collier County, and various non-profits have all contributed to land acquisition efforts within CREW. As an example of one of the partnerships formed in support of CREW land purchases, the Conservancy has sent over a hundred letters to CREW-area land owners to make them aware of preservation opportunities, many of which resulted in successful acquisition, particularly through the local Lee County Conservation 20/20 Land Acquisition Program.

CREW shelters some of the most imperiled species in the United States, including endangered Florida panthers, woodstorks and several species of rare orchids. Protecting CREW is also crucial to preserving Southwest Florida's water supply. Protection of these lands will preserve

connections between three conservation areas critical to the restoration of the Everglades, thus providing a corridor for both wildlife and water flow ways. However, continued population growth in Southwest Florida has created greater demands on natural resources, especially water, and the protection of green spaces for wildlife habitat, water resources and human recreation remains a fundamental piece in ensuring the region's long-term environmental and economic viability.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions? (2000 characters):

This project is extremely effective in meeting the District's core mission. The Conservancy strongly advocates the continued acquisition of lands within the CREW boundary to effectuate greater restoration success and protection of this unique watershed. For example, the Edison Farms property (see attached map), located on the western edge of the CREW lands, is an essential piece to complete flowway restoration and protect water quality flowing into Estero Bay, the state's first aquatic preserve. Edison Farms is the headwaters to three tributaries which feed directly into Estero Bay. Acquiring this property in public ownership will not only aid water quality protection efforts, but also provide flood protection, water storage, and public wellfield protection. The 3,922 acres which comprise Edison Farms have been identified in numerous local, regional and state plans: including the Southwest Florida Comprehensive Watershed Plan and Lee County's Density Reduction Groundwater Recharge Area study. The Conservancy strongly encourages the SFWMD to consider Edison Farms a priority acquisition to expand and improve the CREW project.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues? (2000 characters):

The Conservancy believes CREW is an exemplary project and highlights the success of agency, nonprofit and community partners dedicated to protecting natural resources, water supply and water quality.

Corkscrew Regional Mitigation Bank

In your opinion, how well does the current use of the property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration? (2000 characters):

The Corkscrew Regional Mitigation Bank is an important water restoration project meeting the District's core missions of flood control, restoration, water quality improvements and is adjacent to Imperial Marsh and other conservation lands. The purpose of the Mitigation Bank is to provide mitigation for wetland impacts and restoration opportunities, and is therefore meeting the core mission values for which it was intended.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions? (2000 characters):

No. This property has a specific and prescribed intended use that supports the District's core mission and we are not aware of any other that would do so more effectively.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues? (2000 characters):

No. To our knowledge, there is no better use that would provide support to other important natural resource or public uses.

Unassociated Parcels

The Conservancy is particularly concerned about any future recommendations to surplus some of these spoil sites along the Caloosahatchee River. It would be premature to consider any such action prior to gathering all of the information during the Caloosahatchee Visioning Process, which may identify additional ways in which to utilize these parcels for flood control, sea level rise mitigation, buffers, water storage, and restoration of the waterfront. In addition, several of the properties have already been identified as potential restoration sites or as adjacent to existing conservation lands. Therefore, the following are only the Conservancy's preliminary comments and we reserve the right to submit additional comments after the Caloosahatchee Visioning Process is completed and the future needs of the watershed are clarified. We urge the District to likewise extend the public commenting and assessment of the parcels until after that process has concluded.

In addition, the Southwest Florida Comprehensive Watershed Plan, previously known as the Southwest Florida Feasibility Study, should also be utilized in the review of these properties to determine their utility for hydrologic restoration, wildlife corridors, and other local and regional restoration efforts. If in the future, it is realized that land was surplusued due to a short-term policy goal without identifying restoration or storage needs, it will be much more difficult and likely more expensive to acquire comparable land to replace what was surplusued.

Robb Road – 40.14 acres

This parcel has potential for future restoration, mitigation, disbursed storage and stormwater projects.

Caloosa Shores – 26.95 acres

This parcel has potential for future restoration, mitigation, disbursed storage and stormwater projects. A small creek located on-site could be enhanced by restoration for water quality protection.

Quail Run – 24.79 acres

This parcel has potential for future restoration, mitigation, disbursed storage and stormwater projects.

Kirby Thompson Rd. – 77.5 acres

This parcel has potential for future restoration, mitigation and disbursed storage. It is also possible Caracara habitat.

Center Street – 5.36 acres

This parcel has potential for disbursed storage, water attenuation, and provides a buffer to the Caloosahatchee River.

Lippincott Rd. – 11.63 acres

This parcel has potential for disbursed storage, water attenuation, buffer to river, and water quality enhancement with frontage on Caloosahatchee for small areas north of SR80.

Goggin Rd – 24.22 acres

This parcel is directly adjacent to the Lee County Conservation 20/20 Alva Scrub Preserve, and has the potential to enhance existing conservation lands, facilitate restoration of natural systems, as well as water storage and flood control. The parcel appears to contain fairly intact vegetative communities.

Linwood Rd. – 1.81 acres

This parcel has the potential for flood protection and sea level rise adaptation while providing a buffer to the Caloosahatchee River.

Duke Highway – 22.71 acres

This parcel is adjacent to Otter Creek and the Caloosahatchee, and exhibits potential for water quality enhancement and restoration. Also has potential for flood protection and sea level rise adaptation while providing a buffer to the Caloosahatchee River.

Trout Creek Peninsula – 6 acres

This parcel has potential for oxbow restoration and appears to have intact vegetative communities.

Havens Island – 22.1 acres

This parcel has potential for oxbow restoration and appears to have intact vegetative communities.

I-75 Parcel – 47.3 acres

This parcel is directly adjacent to Lee County Conservation 20/20 Caloosahatchee Creeks Preserve and has the potential to enhance existing conservation lands, facilitate restoration, water storage and connectivity for water and habitat.

Lyndhurst Ln – 85.22 acres

This parcel has the potential for water storage, restoration, and recreational activities. It is currently being utilized by horseback riders and mountain bikers.

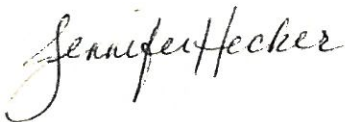
N River Rd. – 412.06 acres

This parcel is directly adjacent to Lee County Conservation 20/20 Daniels Preserve at Spanish Creek and has the potential to enhance existing conservation lands and serve as a water storage site once some of the spoil is removed or sold. The large size of the N River Rd. property also lends itself as highly suitable for restoration and recreational activities.

Conclusion

The Conservancy of Southwest Florida appreciates the SFWMD's attention to our concerns and comments on the West Coast Land Assessment Portfolio. Please do not hesitate to contact either of us if you have questions pertaining to our comments.

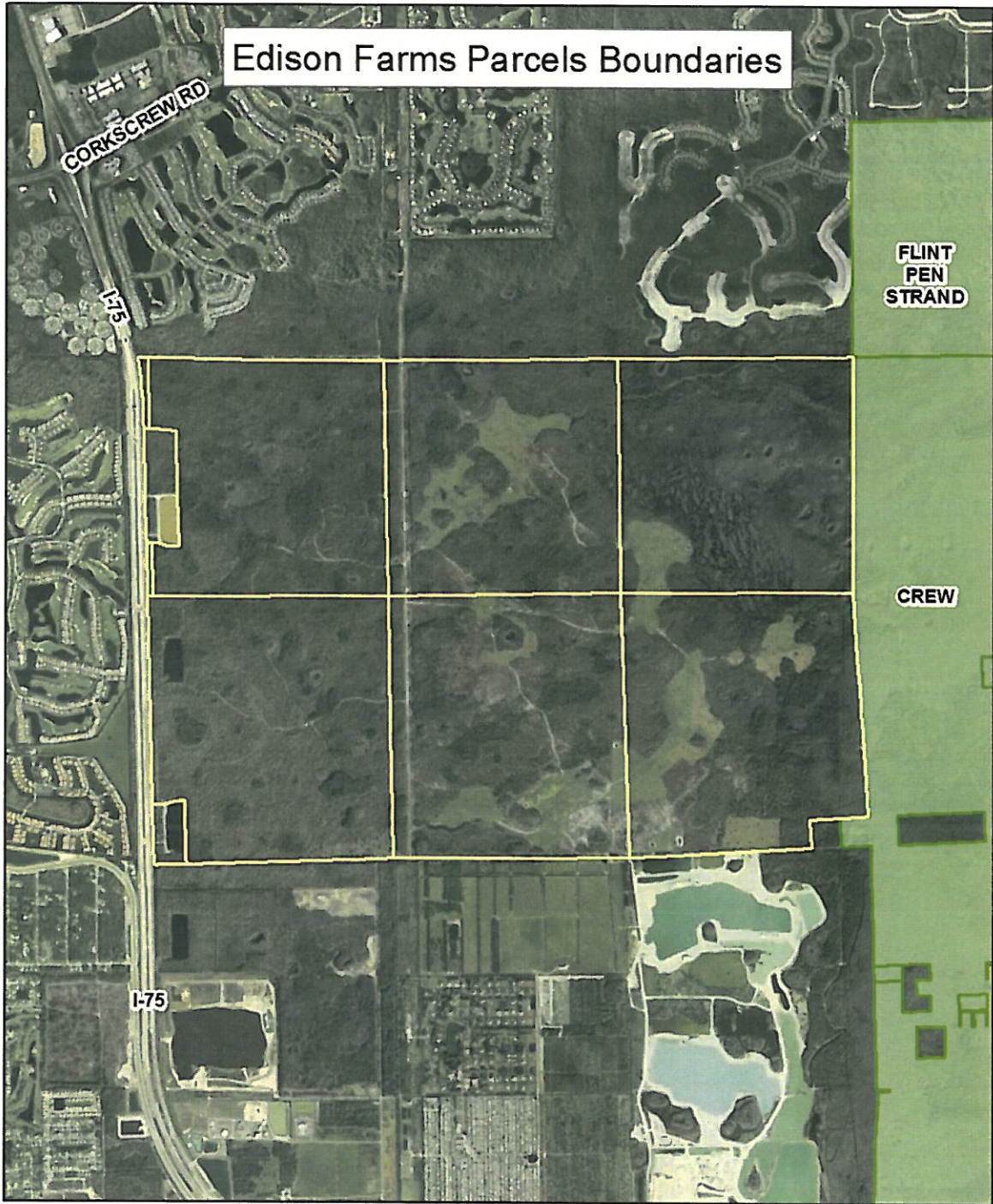
Sincerely,



Jennifer Hecker
Director of Natural Resources Policy
(239)262-0304, Ext. 250



Marisa Polgar
Natural Resources Specialist
(239)262-0304, Ext. 231



Legend

-  Parcel Boundaries
-  Managed Areas

0 0.25 0.5 1 Miles



**Defenders of Wildlife Comments on the SFWMD Land Assessment: West Coast
May 28, 2013**

The following information pertains to all projects:

Submitted by:

Laurie Macdonald, Florida Director
Defenders of Wildlife
lmacdonald@defenders.org
3637 Fourth Street North, Suite 230
St Petersburg, Florida 33704

Primary interest:

Threatened and Endangered Species
Also, Natural Systems Restoration

Sites visited within the last two years:

Our members and/or staff have visited all the project areas

Primary activities:

Wildlife viewing
Other: Wildlife conservation

COMMENTS

Caloosahatchee Water Quality Treatment and Testing Facility

All Parcels

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality Protection/Improvements, Water Supply, Natural Resource Protection and Restoration? The property will contribute significantly to the District's core mission and acquisition purpose by improving water quality in the Caloosahatchee River, as well as serving flood control and water supply needs. This area ranks 6 and higher on the Florida Wildlife Conservation Commission Integrated Wildlife Habitat Ranking System due to its use by species listed as threatened and endangered. Natural resource protection and restoration, and in particular wildlife and wildlife habitat conservation and recovery, are important functions of the property. The agencies, NGOs and private sector have focused a great deal of effort on preserving the north-south connection in this area that provides the remaining natural linkage for northward dispersal by the endangered Florida panther. The District should not dispose of the frontage along SR80 so that rather than drawing development to the site, connectivity to the south can be maintained.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions? Proceeding with the purpose as planned is the appropriate course. The District should retain the frontage along SR80 as development of the zone could limit water and other natural resource management options and sever the connection to the south.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues? Proceeding with the purpose as planned is the appropriate course. Water and land management operations should recognize the interdependency and value of both wetlands and uplands. Keep the SR80 frontage rather than cutting off options and connections.

C-43 Reservoir

All parcels

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality Protection/Improvements, Water Supply, Natural Resource Protection and Restoration? The C-3 Reservoir is an essential component of the water restoration projects for South Florida. The property will provide water storage in the Caloosahatchee watershed and enable management of flows in the river and estuary. The property was purchased for this purpose; beneficial impacts will be realized for the natural system, wildlife and people. Habitat conditions will be improved for an array of native Florida wildlife from fisheries and birdlife, to manatees and micro fauna.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions? Proceeding with the planned project is the proper course and supports the District mission. The acreage that is not thought to be needed for the reservoir project footprint would contribute to the District's mission of natural resource protection and restoration, enhance the benefits of the reservoir and may ultimately be needed for the reservoir optimum function. It would not be prudent to dispose of any of the District's holdings that are a part of this project area.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues? The District should retain its holdings in the project area to enhance the benefits of the reservoir and in case it turns out such acreage is needed to assure optimum function.

Okaloacoochee Slough

All Parcels

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality Protection/Improvements, Water Supply, Natural Resource Protection and Restoration? The Okaloacoochee Slough project area serves all aspects of the District's core mission. The Slough has the highest ranking, a 10, on the Florida Wildlife Conservation Commission Integrated Wildlife Habitat Ranking System. The area provides a host of benefits for maintaining natural systems and supporting water and recreation for people. The Okaloacoochee Slough is essential core and corridor habitat for the endangered Florida panthers and other wildlife and has been a focal area for conservation efforts.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions? No

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues? No

Six-Mile Cypress Slough

All Parcels

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality Protection/Improvements, Water Supply, Natural Resource Protection and Restoration? Flowing from the headwaters of Corkscrew Swamp through a highly populated area of Lee County, Six-Mile Swamp addresses all aspects of the District core mission. The District characterizes Six-Mile Slough as the property with the highest visitation of any District owned land. It provides a vital riverine corridor for water and wildlife, and ranks at least a 6 on the FWCC Integrated Wildlife Habitat Ranking System.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions? No

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues? No.

CREW

All Parcels

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality Protection/Improvements, Water Supply, Natural Resource Protection and Restoration? CREW is recognized as one of the treasures of Southwest Florida and despite heavy pressure in the region that would result in severing its connections, a great deal of conservation effort has helped to protect and restore its water, land and wildlife values. CREW serves as the headwaters to the Imperial River and Picayune Strand. It provides essential habitat for the endangered Florida panther, wood stork and a host of other native wildlife. CREW rates a 10, the highest level, on the Florida Wildlife Conservation Commission Integrated Wildlife Habitat Ranking System. Continuing to expand protection and maintain connectivity and buffering for CREW should be high among the District's objectives; therefore, all pieces of the system should be retained and managed, if most efficient, through cooperative projects.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions? No

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues? No.

Corkscrew Regional Mitigation Bank

All Parcels

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality Protection/Improvements, Water Supply, Natural Resource Protection and Restoration? Corkscrew Regional Mitigation Bank contributes to the District's mission to restore natural systems and wetlands and is strategically situated so as to enhance adjacent areas. The property ranks up to 10, the highest level, on the Florida Wildlife Conservation Commission Integrated Wildlife Habitat Ranking System, providing important core and connected habitat for native wildlife including several threatened and endangered species.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions? No

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues? No.

Unassociated Parcels



United States Department of the Interior



FISH AND WILDLIFE SERVICE

J. N. "Ding" Darling National Wildlife Refuge Complex
1 Wildlife Drive
Sanibel, FL 33957

Ray Palmer, Real Estate Section Leader
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, Florida 33416

May 28, 2013

Dear Mr. Palmer:

Thank you for the opportunity to review the South Florida WMD's Land Assessment for the West Coast Region. I am providing comment on behalf of the J.N. "Ding" Darling National Wildlife Refuge (NWR) Complex, and other national wildlife refuges in southwest Florida. The Project Area known as the Unassociated Parcels includes tracts that support the District's core mission of natural systems protection and wildlife habitat, even though they no longer serve the purpose of spoil deposition as they were originally acquired for. Therefore, I would recommend that all of those parcels be considered for their natural systems and wildlife value before deciding to surplus those lands. However, if it is decided to surplus those parcels every effort should be made to transfer ownership or management to a conservation partner, such as the Florida Department of Environmental Protection or Lee County. For the parcels known as the I-75 Parcel, Havens Island, and Trout Creek Peninsula, another option may be the U.S. Fish and Wildlife Service as these lands are within close proximity to Caloosahatchee NWR. If these parcels were approved for inclusion in the Caloosahatchee NWR acquisition boundary, they could be protected, restored, and managed for migratory birds and other native wildlife.

Another Project Area that warrants continued conservation is the CREW District, specifically the Camp Keais Parcels. This area still functions as an important slough flow-way and an important wildlife corridor for Florida panthers and Florida black bears. Therefore, I would recommend that these parcels be maintained for their water quality protection and supply, natural systems protection, and wildlife value. However, if it is decided to surplus these parcels, every effort should be made to transfer ownership or management to a conservation partner, such as the Florida Fish and Wildlife Conservation Commission or Collier County. Another option may be the U.S. Fish and Wildlife Service as these lands are within close proximity to Florida Panther NWR. If these lands were approved for inclusion in the Florida Panther NWR acquisition boundary, they could be protected and managed for endangered species, migratory birds, and other native wildlife. Thank you for your consideration.

Sincerely Yours,

Paul Tritaik
Wildlife Refuge Manager

SFWMD West Coast Region Land Assessment Comment Form

Audubon Florida/Collier County Audubon Society
Attention: Brad Cornell, Southwest Florida Policy Associate
1020 8th Avenue, South, Suite 2
Naples, FL 34102
bcornell@collieraudubon.org
May 28, 2013

Caloosahatchee Water Quality Facility

Which assessment unit or parcel do these comments address?

Caloosahatchee Water Quality Treatment and Testing Facility

What describes your primary interest?

All those listed (Water Quality, Water Supply, Flood Control, Natural System Restoration, Threatened and Endangered Species, Cost Savings/Mgmt Efficiency, Growth Management and Land Use). Single issue management is usually least efficient and wastes potential for public benefits from investment of public funds.

Have you visited this site in the last two years?

Only to drive by

What type of activity do you most frequently participate in on this property?

Looking for wildlife from the road (cara-cara, especially)

In your opinion, how well does the current use of the property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

Lack of implementation of water quality treatment testing, as well as potential habitat restoration on appropriate portions of the property have delayed its utility for SFWMD's core missions.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

Collier County Audubon Society and Audubon Florida ("Audubon") support implementation of the water quality operations and restoration of habitat. We also recognize there is a contractual commitment to afford some commercial uses to this site on the frontage with SR80. Audubon recommends concentrating this use to only the minimum footprint which is viable commercially, and in a manner that accommodates wildlife movement through the property to the habitat acreage on the northern portion of the property. Likewise, the water quality treatment facilities should be built to accommodate necessary wildlife movement through and on those areas.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

Beyond the described wildlife accommodation and restoration described above, no.

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May 28, 2013

C-43 Reservoir

Which assessment unit or parcel do these comments address?

C-43 West Basin Reservoir site and adjacent acreage

What describes your primary interest?

All those listed (Water Quality, Water Supply, Flood Control, Natural System Restoration, Threatened and Endangered Species, Cost Savings/Mgmt Efficiency, Growth Management and Land Use). Single issue management is usually least efficient and wastes potential for public benefits from investment of public funds.

Have you visited this site in the last two years?

Only to drive by regularly

What type of activity do you most frequently participate in on this property?

Watching for wildlife from the road, especially cara-cara.

In your opinion, how well does the current use of the property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

Thus far, it has proven invaluable for construction of test cells in preparation for construction of the full reservoir. However, lack of commencement of that reservoir construction has caused lengthy delay to attaining the core mission objectives of the project. Those objectives

include: capture of excess flows from Lake Okeechobee; release of that water during the dry season to better balance downstream estuarine salinities, thereby restoring sea grasses and oysters which also improves water quality; and reducing water supply stressors on Lake Okeechobee. Reducing water demands on the Lake is also vital to the successful implementation of the Central Everglades Planning Project (CEPP), and thus a completed C-43 Reservoir is a pre-requisite for construction of the CEPP.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

Ultimately, no. However, in the interim, the SFWMD should consider other uses that partially achieve core mission objectives. Such interim uses include: construction of a preliminary phase of the reservoir; use of pumps to place some excess water on the site for some watershed benefits; and short-term leasing under market terms for commercial agricultural uses as long as such leases don't hinder restoration work. In addition, there are about 2,000 acres of land on the north side next to SR80 not needed for the project which should be retained for possible complementary uses, some of which may not be recognized until the reservoir is complete. Some possible reasonable uses of those 2,000 acres: a) additional water quality treatment; b) habitat restoration (perhaps for gopher tortoises or scrub jays); c) ATV recreation park with restoration of some habitat; d) consideration for future trade for strategic other restoration lands.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

There are often opportunities for additional compatible public access for many different activities. All sites should be evaluated for such compatible access, such as birdwatching, fishing, biking, hiking, etc.

SFWMD West Coast Region Land Assessment Comment Form

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May 28, 2013

Okaloacoochee Slough

Which assessment unit or parcel do these comments address?

Okaloacoochee Slough

What describes your primary interest?

All those listed (Water Quality, Water Supply, Flood Control, Natural System Restoration, Threatened and Endangered Species, Cost Savings/Mgmt Efficiency, Growth Management and Land Use). Single issue management is usually least efficient and wastes potential for public benefits from investment of public funds.

Have you visited this site in the last two years?

Not personally, but many of our members and other staff do regularly

What type of activity do you most frequently participate in on this property?

When I have visited in the past: hiking, birdwatching, consultation with staff on groundcover and other habitat restoration work.

In your opinion, how well does the current use of the property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

Audubon agrees with the SFWMD staff's very positive assessment of the core mission and other resource values of this unique and critical ecological landscape. It clearly meets all of the core mission objectives

and many other public and resource objectives. Some additional vital roles this property plays include: a) habitat and hydrologic linkage between Big Cypress/Fakahatchee/Panther Refuge and the remaining landscape connections to and across the Caloosahatchee River into vast habitat areas north of the River. This linkage is especially important for the endangered Florida panther. From a hydrologic view, OK Slough sits at the headwaters of the Western Everglades – the combined Corkscrew/Big Cypress watersheds.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

This property requires regular prescribed burning which is labor intensive and constrained by weather, permitting, and funding. This should be a high priority in management of the essential habitats on this land.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

There are often additional opportunities for compatible public access for many different activities. All sites should be evaluated for such compatible additional access, such as birdwatching, fishing, biking, hiking, etc.

SFWMD West Coast Region Land Assessment Comment Form

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Attention: Brad Cornell, Southwest Florida Policy Associate
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May 28, 2013

Corkscrew Regional Mitigation Bank

Which assessment unit or parcel do these comments address?

Corkscrew Regional Mitigation Bank

What describes your primary interest?

All those listed (Water Quality, Water Supply, Flood Control, Natural System Restoration, Threatened and Endangered Species, Cost Savings/Mgmt Efficiency, Growth Management and Land Use). Single issue management is usually least efficient and wastes potential for public benefits from investment of public funds.

Have you visited this site in the last two years?

Only to drive by regularly – I have been onsite in the early stages of restoration and bank construction.

What type of activity do you most frequently participate in on this property?

When onsite in the past, I've looked for birds and wildlife, as well as learned about shallow, seasonal wetland restoration strategies.

In your opinion, how well does the current use of the property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

It is vital to all of the core mission objectives for the District. It is especially important for restoration of additional shallow, season wetland habitats in

the southwest Florida region, which are disproportionately missing compared to other deeper wetland types. This dearth of short hydroperiod wetlands has been identified by Audubon science staff as a key factor in the decline of many imperiled species in south Florida, including especially the endangered wood stork.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

Consideration of similarly collaborative but non-regulatory and effective shallow wetland restoration for less money on additional adjacent and nearby parcels within the CREW landscape, especially old farm fields. This would complement the regulatory wetland bank restoration taking place on this parcel.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

Not in addition to that mentioned above.

SFWMD West Coast Region Land Assessment Comment Form

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bcornell@collieraudubon.org
May 28, 2013

Six Mile Cypress Slough

Which assessment unit or parcel do these comments address?

Six Mile Cypress Slough

What describes your primary interest?

All those listed (Water Quality, Water Supply, Flood Control, Natural System Restoration, Threatened and Endangered Species, Cost Savings/Mgmt Efficiency, Growth Management and Land Use). Single issue management is usually least efficient and wastes potential for public benefits from investment of public funds.

Have you visited this site in the last two years?

Yes

What type of activity do you most frequently participate in on this property?

Birdwatching, wildlife viewing and hiking.

In your opinion, how well does the current use of the property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

This important parcel fulfills all of the District's core mission objectives, including watershed functions such as recharge, flood attenuation, water cleansing for Estero Bay, and wildlife habitat support. It is especially

notable for its high profile in the urban Lee County community and receives the highest visitorship of any District lands.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

Only to expand its areal footprint to expand its watershed functions. Cooperation and incentives for better management of nearby lands should also be pursued.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

None in addition to those identified above.

SFWMD West Coast Region Land Assessment Comment Form

Audubon Florida/Collier County Audubon Society
Attention: Brad Cornell, Southwest Florida Policy Associate
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Naples, FL 34102
bcornell@collieraudubon.org
May 28, 2013

CREW

Which assessment unit or parcel do these comments address?

Corkscrew Regional Ecosystem Watershed Trust

What describes your primary interest?

All those listed (Water Quality, Water Supply, Flood Control, Natural System Restoration, Threatened and Endangered Species, Cost Savings/Mgmt Efficiency, Growth Management and Land Use). Single issue management is usually least efficient and wastes potential for public benefits from investment of public funds.

Have you visited this site in the last two years?

Yes, in many locations

What type of activity do you most frequently participate in on this property?

Birdwatching, wildlife viewing, hiking, educational activities, leading field trips for Audubon chapters and other groups, policy research

In your opinion, how well does the current use of the property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

CREW is one of the most exemplary collaborative land acquisition, management, and public interest watershed projects ever conceived and

should be a source of great pride for the District and all its partners. It clearly fulfills all of the District's core mission objectives. This is a project that is still being worked on, and has met many challenges with much success for habitat, water supply, flood protection, estuary improvements, and water cleansing. There is more to do, however, and the project should be expanded to include adjacent critical parcels, such as Edison Farms, in complement to Lee's 20/20 program, Audubon, USFWS, Collier County's RLSA Program and Conservation Collier. It is notable that most of Camp Keais Strand has been permanently protected using Collier's RLSA Stewardship Easements without public funding. Of particular importance is looking for opportunities to increase the amount of shallow, seasonal wetlands that are restored – especially wet prairies which Audubon research shows there to be a significant disproportionate lack of.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

There are always opportunities to consider better management strategies, but the purposes for protecting and buying CREW remain constant, as stated above and invested in for many years by all the CREW partners. Partnership and collaboration must remain at the heart of these successes, and the SFWMD must continue to invest in this treasure.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

Nothing in addition to what is noted above.

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May 28, 2013

Unassociated Parcels

Which assessment unit or parcel do these comments address?

Army Corps of Engineers parcels along and near the Caloosahatchee River that are no longer needed for dredging spoil use.

What describes your primary interest?

All those listed (Water Quality, Water Supply, Flood Control, Natural System Restoration, Threatened and Endangered Species, Cost Savings/Mgmt Efficiency, Growth Management and Land Use). Single issue management is usually least efficient and wastes potential for public benefits from investment of public funds.

Have you visited this site in the last two years?

No

What type of activity do you most frequently participate in on this property?

N/A

In your opinion, how well does the current use of property further the District's core missions of Flood Control, Water Quality protection/improvements, Water Supply, Natural Resource protection and restoration?

As riverfront parcels, or land nearby, these parcels all offer opportunities for many of the SFWMD's core mission objectives, and indeed are

performing some now in their vacant or degraded states. All should be retained and evaluated for a suite of options that could significantly contribute to the District core mission. Such uses may include water quality projects and water storage projects, among which could be possible aquifer storage and recovery wells, if feasible. SFWMD is just embarking on its Caloosahatchee River Watershed Visioning effort and there should be patience exercised in determining what role these various parcels may play, pending that outcome. It is also possible the Corps could release additional parcels.

In your opinion, is there a better use of the property that would provide more effective support for the District's core missions?

Habitat restoration values and public access to the River and other resources are important considerations. Many of the sites need wildlife and bird surveys to determine current use or potential for habitat values.

In your opinion, is there a better use of the property that would provide support for other important natural resource or public use issues?

It is possible other management agencies would be a better fit for some parcels, once evaluation for uses is complete. The Caloosahatchee River National Wildlife Refuge is one very logical recipient and manager. Where parcels abut other agency land, joint management or transfer can be considered, such as with the I-75 parcel next to Caloosahatchee Regional Park, as long as habitat or water resources objectives remain primary.

JOHN JAY WATKINS, P. A.

Attorney and Counselor At Law

150 South Main Street
P.O. Box 250
LaBelle, Florida 33975
Telephone 863-675-4424
Facsimile 863-675-4521

RECEIVED

MAY 17 2013

May 14, 2013

LAND MANAGEMENT
SECTION

via email and regular mail

Mr. Ray Palmer
Real Estate Section Leader SFWMD
3301 Gun Club Road, MSC 5210
West Palm Beach, FL 33406

IN RE: West Coast Assessment Region - Unassociated Parcels - Caloosa Shores

Dear Mr. Palmer:

I represent the Community Association of Caloosa Shores, Inc. There is currently an associated parcel in the West Coast land assessment region labeled designated "Caloosa Shores" on your public websites.

I assisted in the development of this property by obtaining the access easements for the subdivision from County Road 78. I understand there is a question whether SWFMD has access to the "Caloosa Shores" assessment parcel along, across and over Caloosa Shores Drive.

It is not unusual that some will isolate a portion of a clause or document and ignore the rest if it fits their position or scenario. However, the courts will look at the entire paragraph or document to determine its meaning. The first sentence on the Caloosa Shores plat dedication dedicates the roads to the Community Association of Caloosa Shores, Inc. There is nothing in the dedication about dedicating the roads to anyone else. There is no dedication to "the public".

The last sentence of the dedication specifies that they are "private streets or roads" and are not public roads dedicated to the public and Hendry County and thus are not to be maintained by Hendry County. The purpose of the last sentence is to clarify that Hendry County isn't responsible for maintenance and nothing more. The roads are actually now owned by the Association pursuant to a 2007 deed.

That last sentence states that they are "private streets" and the term "use of the abutting property owners only" thus relates back to the first sentence where they are

Mr. Ray Palmer
May 14, 2013
Page Two

IN RE: West Coast Assessment Region - Unassociated Parcels - Caloosa Shores

dedicated to the Association. The plat, or a dedication on a plat, gives no one other than the property owners within the plats any right to use of the streets unless dedicated to "the public". In fact, the last sentence in the dedication actually clarifies that it is not an easement for ingress/egress for anyone but the Community Association and the lot owners. I.e. until it is dedicated to the "public" and accepted by Hendry County, no one but the Community Association and the lot owners (and their guests, tenants, invitees, vendors, etc.) may use it for ingress and egress.

I hope this clarifies this dedication on the plat. It is my opinion that SWFMD does not have legal access across Caloosa Shores Drive to reach the assessment parcel. It is my understanding that there is an access easement running from the northern portion of the assessment parcel westward to County Road 78. Legal access to the assessment parcel would be across that easement.

Please call or write if you have any questions at all or if I can furnish further information to you regarding this matter.

Sincerely,



John Jay Watkins



3333 Sanibel Captiva Road, Sanibel Island Florida 33957
Telephone 239.472.2329

May 28, 2013

Ray Palmer, Real Estate Section Leader
South Florida Water Management District
Land Resources Bureau
3301 Gun Club Road, MSC 5214
West Palm Beach, FL 33406

Transmitted by email: ray.palmer@sfwmd.gov

Dear Mr. Palmer:

I write to you on behalf of the Sanibel Captiva Conservation Foundation to comment on the land assessment/surplusing effort for District owned lands in the west coast region.

We thank you for coming to Ft Myers to provide an opportunity for local residents and taxpayers to meet with District representatives to ask questions and provide comments. I also appreciate the opportunity to provide our comments on the 22 parcels by letter in lieu of the cumbersome parcel by parcel online input method.

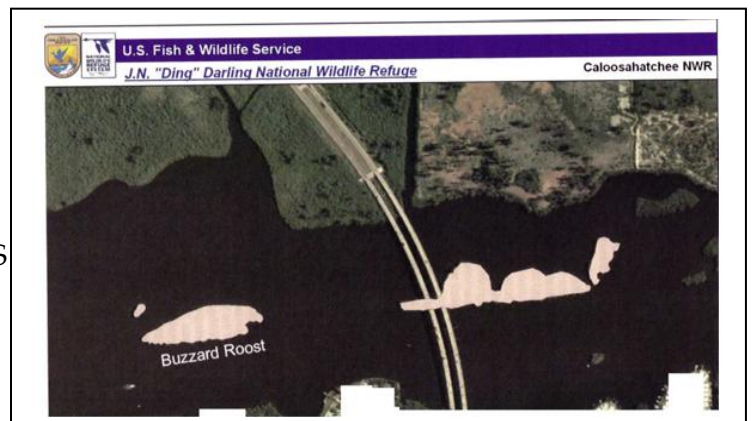
Unassociated Parcels

I-75 Parcel - 47.3 acres

This parcel is surrounded by conservation lands; a Lee County Conservation 20/20 park, Caloosahatchee Creeks Preserve, and the USFWS Caloosahatchee National Wildlife Refuge, pictured below, which was established by President Woodrow Wilson in 1920 as a "preserve and breeding ground for native birds". This parcel serves the core mission of the District to provide flood attenuation, adaptation for sea level rise, water quality benefits and provides enhancement potential and aesthetic benefits to enhance existing conservation lands and recreational enjoyment of the Great Calusa Blueway paddling trail.

Conservation is the highest and best use for this parcel to meet the core mission objectives.

The planned Caloosahatchee visioning process may define additional uses for this parcel which may include partnership with Lee County's Conservation 2020 and the USFWS Refuge.



Trout Creek Peninsula - 6 acres

This parcel located in one of only seven estuarine oxbows that provide unique functions, services and opportunities for habitat preservation, diversity and oxbow restoration within the Caloosahatchee estuary.

This parcel serves the core mission of the District to provide flood attenuation, adaptation for sea level rise, water quality and aesthetic benefits to enhance recreational enjoyment of the Great Calusa Blueway paddling trail.

Conservation is the highest and best use for this parcel to meet the core mission objectives. The planned Caloosahatchee visioning process may define additional uses for this parcel. There may also be potential partnership opportunities with the USFWS as part of the Caloosahatchee NWR.

Havens Island - 22.1 acres

This parcel is part of the island associated with the oxbow at the historic settlement of Upcohall where Trout Creek and Owl Creek meet the Caloosahatchee in one of only seven remaining estuarine oxbows. These unique remnants of the historic meanders of the Caloosahatchee provide rare nursery habitat and opportunities for oxbow restoration, conservation of habitat diversity and preservation of the rivers aesthetic within the Caloosahatchee river and estuary.

This parcel serves the core mission of the District to provide flood attenuation, adaptation for sea level rise, water quality and aesthetic benefits to enhance recreational enjoyment of the Great Calusa Blueway paddling trail. This parcel is a SWFL regional restoration team restoration target.

Conservation is the highest and best use for this parcel to meet the core mission objectives. The planned Caloosahatchee visioning process may define additional uses for this parcel. There may also be potential partnership opportunities with the USFWS as part of the Caloosahatchee NWR.

Duke Highway - 22.71 acres

This parcel is adjacent and landward to a riverfront easement held by the Army Corps of Engineers. This parcel serves the core mission of the District to provide opportunities for water quality enhancement, buffering for the Caloosahatchee, flood attenuation and adaptation for sea level rise and habitat restoration.

Conservation is the highest and best use for this parcel to meet the core mission objectives.

Linwood Rd. - 1.81 acres

Similar to the Duke Highway parcel, this remnant linear parcel can serves the core mission of the District by providing flood attenuation, adaptation for sea level rise, water quality benefits through buffering and undeveloped landscape.

The planned Caloosahatchee visioning process may define additional uses for this parcel.

Lyndhurst Ln - 85.22 acres

This parcel provides the potential to serve the core mission of the District for much needed distributed water storage, recharge and treatment in the Caloosahatchee watershed. The site is currently supports recreational users including horseback riders and mountain bikers. The planned Caloosahatchee visioning process may define additional uses for this parcel.

Goggin Rd - 24.22 acres

This parcel is directly adjacent to the Lee County Conservation 20/20 Alva Scrub Preserve, which supports scrub jays and gopher tortoises. This parcel meets the core mission of the district by buffering and enhancement of existing adjacent conservation lands, restoration of natural systems, critical habitat protection and water recharge opportunities.

The adjacent preservation lands could benefit from preservation of this adjacent parcel that features intact native vegetative communities. Conservation is the highest and best use for this parcel to meet the core mission objectives.

Lippincott Rd. - 11.63 acres

This parcel serves the core mission of the District as undeveloped native habitat for much needed distributed water storage, attenuation, recharge and treatment in the Caloosahatchee watershed. The site provides a native habitat with potential for good habitat diversity and cover with access to the river corridor critical to native species.

Conservation is the highest and best use for this parcel to meet the core mission objectives. The planned Caloosahatchee visioning process may define additional uses for this parcel.

Center Street - 5.36 acres

This parcel features imperiled rare natural communities on the northern one third of the site which is also designated as priority 2 strategic habitat conservation areas with good species richness.

This serves the core mission of the District as undeveloped native habitat for much needed critical native habitat, water recharge and treatment in the Caloosahatchee watershed with potential for good habitat diversity and cover critical to native species.

Conservation is the highest and best use for this parcel to meet the core mission objectives. The planned Caloosahatchee visioning process may define additional uses for this parcel.

N River Rd. - 412.06 acres

This parcel is a spoil disposal site from the 1960s dredging of the Caloosahatchee which is directly adjacent to Lee County's Conservation 20/20 Daniels Preserve at Spanish Creek. This parcel meets the core mission of the District as one of the largest parcels that could provide much needed distributed water storage, recharge and treatment in the Caloosahatchee watershed in a compatible manner to the adjacent conservation lands with recreational potential

The planned Caloosahatchee visioning process may define additional uses for this parcel.

Spanish Creek - 2.9 acres

This linear 2.9 acre parcel is adjacent to three other District owned parcels that are not listed in this review. Added together the four parcels total 19.29 acres. It is not clear why the 2.9 acre parcel is listed while the adjacent 16.39 acres are not.

Given the larger context of ownership this parcel provides access to the river, ecotonal edge for the adjacent forested parcels that provide a covered corridor for wildlife accessing and crossing the river. These parcels serve the core mission of the District by providing undeveloped landscape for recharge, flood attenuation, adaptation for sea level rise, water quality benefits and buffering as well as river access.

Conservation is the highest and best use for this parcel to meet the core mission objectives. The planned Caloosahatchee visioning process may define additional uses for this parcel.

Kirby Thompson Rd. - 77.5 acres

This Hendry County parcel contains priority 3 habitat along the eastern edge with possible use of western area by Crested Caracara.

This parcel meets the core mission of the District as a parcel that could provide much needed distributed water storage, recharge and treatment in the Caloosahatchee watershed.

This parcel is in a future growth corridor that could provide needed infrastructure for future growth, habitat restoration and mitigation.

Quail Run - 24.79 acres

This Hendry County parcel contains priority 3 strategic habitat along the north western border. This parcel meets the core mission of the District as a parcel that could provide much needed distributed water storage, recharge and treatment in the Caloosahatchee watershed.

This parcel is in a future growth corridor that could provide needed infrastructure for future growth, including storage, treatment and storm water management.

Caloosa Shores - 26.95 acres

This Hendry County parcel includes a portion of Bee Branch, a tributary to the Caloosahatchee in the northeast corner.

This parcel meets the core mission of the District to provide flood attenuation, distributed water storage, recharge and water quality treatment in the Caloosahatchee watershed. Protection of river and tributary corridors enhances and allows river access, restoration of natural flow ways, provides habitat and maintains an aesthetic character for recreational enjoyment of the Great Calusa Blueway paddling trail.

The planned Caloosahatchee visioning process may define additional uses for this parcel.

Robb Road – 40.14 acres

This Hendry County parcel is in proximity to Pollywog Creek, a tributary to the Caloosahatchee. This parcel is in a future growth corridor that could provide needed infrastructure for future growth, including storage, treatment and storm water management.

This parcel meets the core mission of the District to provide distributed water storage, recharge and water quality treatment in the Caloosahatchee watershed.

The planned Caloosahatchee visioning process may define additional uses for this parcel.

C-43 Reservoir - 1,921 acres

The parcel subject to this assessment is the 1,921 acres that make up the northern portion of the 10,500 acre reservoir project. The entire site, including this acreage was purchased and designed for the purpose of providing 170,000 acre feet of water storage in the Caloosahatchee watershed; a small fraction of the storage needed to address excess discharges to the Caloosahatchee estuary. The reservoir project design does not include a water quality component, unlike other planned reservoirs, despite the serious water quality issues, TMDLs and BMAPs faced by the Caloosahatchee ecosystem.

Therefore, this entire acreage is needed for the stated purpose of the project which is consistent with and needed to serve the core mission of the District and stated project objective; to manage water resources, provide flood attenuation, reduce salinity and nutrient impacts of runoff to the river and estuary.

BOMA Caloosahatchee Water Quality Treatment & Testing facility

This property was acquired in partnership with Lee County to test and implement nitrogen nutrient removal technologies to help clean water flowing into the Caloosahatchee and to serve as a dispersed water storage project. In an agreement between the District and Glades County a portion of the road frontage along SR 80 was promised to be made available for surplus for the purposes of future commercial development. In addition the forested river frontage was deemed to not be used as part of the nitrogen treatment/storage facilities.

This projects eastern boundary borders the panther ecoscape project that is part of the long term panther protection plan that designates a critical connector /crossing of the river from the Gulf Coast to the Okkaloachoochee slough. For this reason it is recommended that only the south western portion of the frontage be considered for commercial uses under the agreement with Glades County to keep it as far as possible from the panther corridor.

This parcel serves the core mission of the District to provide river buffering and wildlife habitat, flood attenuation, adaptation for sea level rise, water quality benefits and provides potential recreational opportunities associated with the Ortona lock. The planned Caloosahatchee visioning process may define additional uses for this parcel.

Six Mile Cypress Slough

This parcel serves the core mission of the District in protecting a key flow way, native habitat protection, water recharge, water quality treatment for the receiving waters of the Estero Bay

Aquatic Preserve, wildlife corridor and today provides a wilderness experience in an area where explosive growth has surrounded it adding to the critical need for protection. Panther and black bear are among the key species that use this corridor. There is a critical need to expand the boundaries to acquire the headwaters and cypress arm. Continued conservation and public access is the highest and best use for this parcel to meet the core mission objectives.

Okaloachoochee Slough

Located at the top of the watershed this parcel is critical for managing the watershed. Described as a gem of conservation this well managed area is a critical wildlife corridor used by the Florida panther among others. It is used heavily for hunting and by equestrians as well as bird watching and nature walks.

This parcel serves the core mission of the District to protect and manage water, providing natural storage on the land, providing water quality benefits, wildlife corridors and habitat protection and recreational opportunities. In fact expansion of the boundaries is desired to better maintain these functions. Also desired are under road wildlife crossings.

Conservation is the highest and best use for this parcel to meet the core mission objectives.

CREW East & West

This fantastic project is the definition of the core mission of the District encompassing 60,000 acres of state, federal, local and NGO lands it is the largest intact watershed. An investment that has been built over the past 20 plus years. It meets the core mission of the District in providing water storage, recharge, restoration and rehydration of water supply, water quality treatment, fish and wildlife habitat, corridor connections via the Fakahatchee, Corkscrew swamp and southern critical CREW. Provides and protects habitat for critical species including wood storks, panther, black bear just to name a few.

Continued conservation is the highest and best use for this parcel to meet the core mission objectives.

Corkscrew Mitigation Bank

This District owned, privately managed project site is used by the Florida panther and black bear. Continued conservation is the highest and best use for this parcel to meet the core mission objectives.

Sincerely,



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

PAVESE LAW FIRM

KATHERINE R. ENGLISH

Direct dial: (239) 336-6249
Email: KatherineEnglish@paveselaw.com

1833 Hendry Street, Fort Myers, Florida 33901 | P.O. Drawer 1507, Fort Myers, Florida 33902-1507 | (239) 334-2195 | Fax (239) 332-2243

May 15, 2013

Ray Palmer, Section Leader
Real Estate Management Section
Operations, Maintenance & Construction Division
South Florida Water Management District
P.O. Box 24680 (MSC 7233)
West Palm Beach, FL 33406

**Re: West Coast Assessment Region 08)
Unassociated Parcels
Linwood Road**

Dear Mr. Palmer:

Thank you for taking the time to talk to me about the Linwood Road parcel in the West Coast Assessment Region 08) Unassociated Parcels on the morning of May 14, 2013. Please accept this letter as notice that this firm represents James W. Green who owns the property located at 1561 Lee Avenue, Alva, Florida and is identified by Lee County STRAP number 22-43-26-02-0000F.0040. This property is immediately adjacent to the District's property identified in the West Coast Assessment Region Unassociated Parcels as Linwood Road (and identified by Lee County STRAP number 22-43-26-01-00006.0000).

Mr. Green purchased the property at 1561 Lee Avenue in November of 2002 and has owned the property since. The property has an existing site built home and a permitting, existing dock in the C-43 accessed by a footpath from the house. Until the District began its assessment of surplus lands, Mr. Green was unaware that his property abutted a property owned by the District rather than immediately abutting the right of way of the Caloosahatchee River.

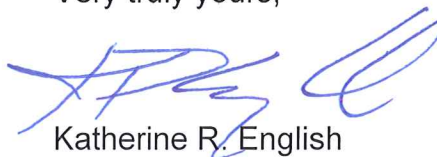
Mr. Green would prefer that the District's ownership and use of the Linwood Road parcel remain unchanged; however, recognizing the District is more likely to determine that the Linwood Road parcel is not needed for its mission, he respectfully requests that the District consider entering into arm's length negotiations with him for the sale of a portion of the property. As the

owner of the property immediately adjacent to that portion of the Linwood Road parcel lying between his northern property boundary and the right of way line of the C-43. Mr. Green is willing to consider the purchase that portion of the parcel at its fair market valuation as determined by appraisal. (See marked aerial).

Auctioning the property to the public at large serves no greater public purpose. To the contrary, such a sale, particularly if Mr. Green were unsuccessful in bidding, would instead be extremely disruptive to his existing use of his property and his dock without providing any benefit to the District. The alternative proposed by Mr. Green would allow the District to dispose of that portion of the Linwood Road parcel in a financially reasonable manner without the damage to Mr. Green's existing uses or property values.

Based on the foregoing, Mr. Green requests that the District staff recommend to the Governing Board that this portion of the Linwood Road property, if determined to be surplus, be subject to the process for the release of excess right of way or canal easement to the adjacent landowner rather than a sale at auction. If staff requires additional information in developing its recommendation to the District's Governing Board in regard to the Linwood Road parcel, please contact me at your convenience. Thank you for the opportunity to comment on this matter and we look forward to the District's consideration of Mr. Green's requests.

Very truly yours,



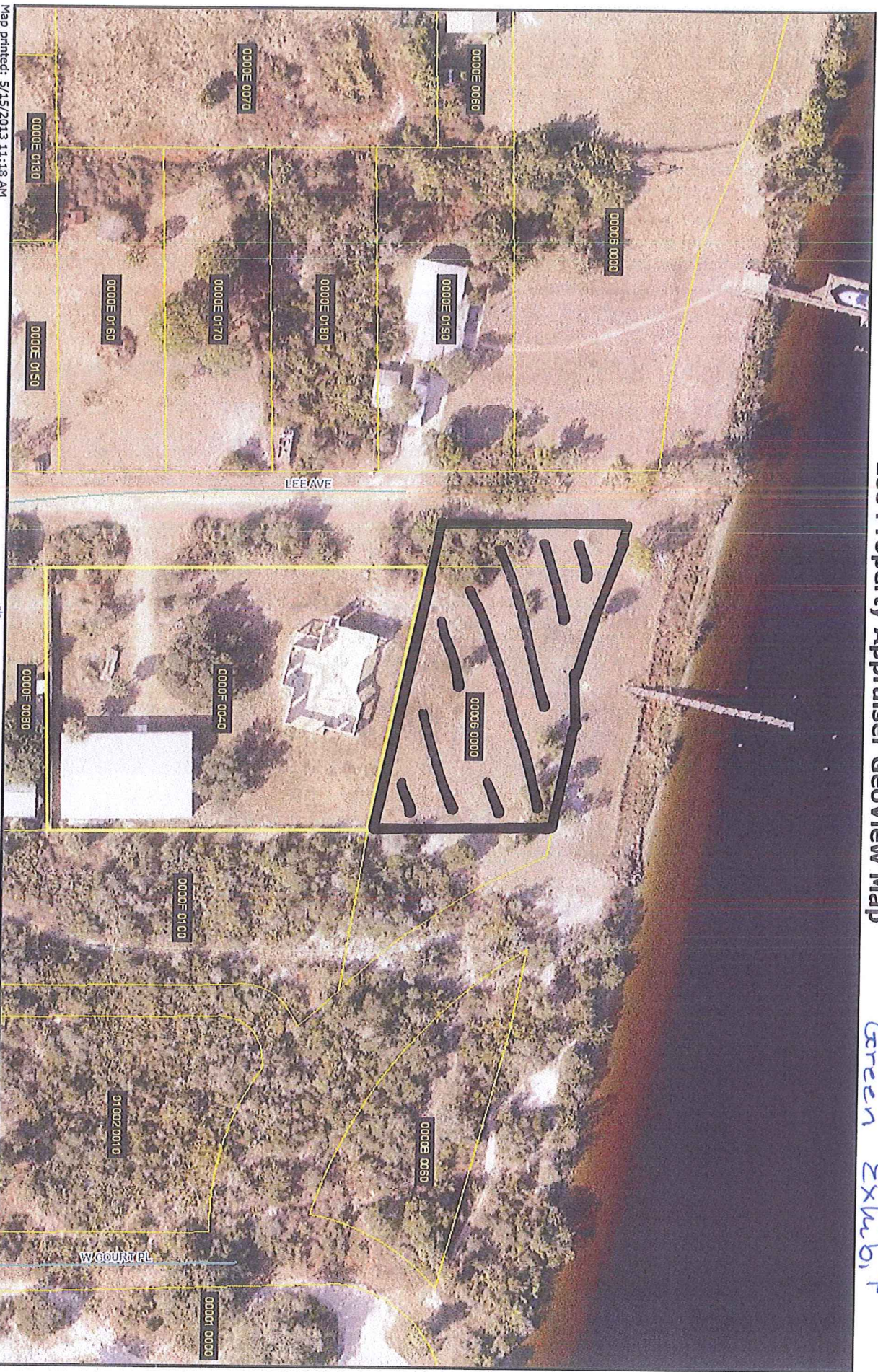
Katherine R. English

KRE/ss
Enclosure

cc: Mr. James Green

Lee Property Appraiser GeoView Map

Green Exhibit



Aerial Imagery 2012 Hi-Res (1/2 foot) Parcels and Streets

- Parcel Lines
- Street Centerlines
- Delinquent Tax Parcels

Disclaimer: Maps and documents made available to public by the Lee County Property Appraiser's office are not legally recorded maps or surveys and therefore are not intended to be used as such. The maps and documents are created as part of a Geographic Information System (GIS) that compiles records information and data from various departments, cities, county, state and federal sources. The source data may contain errors. Users are encouraged to examine the documentation or metadata associated with the data on which the map is based for information related to its accuracy, currentness, and limitations.

PAVESE LAW FIRM

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May 15, 2013

Ray Palmer, Section Leader
Real Estate Management Section
Operations, Maintenance & Construction Division
South Florida Water Management District
P.O. Box 24680 (MSC 7233)
West Palm Beach, FL 33406

Re: *West Coast Assessment Region 08)*
Unassociated Parcels
Linwood Road

Dear Mr. Palmer:

Thank you for taking the time to talk to me about the Linwood Road parcel in the West Coast Assessment Region 08) Unassociated Parcels on the morning of May 14, 2013. Please accept this letter as notice that this firm represents John Duckworth who owns the property located at 1530 Lee Avenue, Alva, Florida, and identified by Lee County STRAP number 22-43-26-02-0000E.0190. This property is immediately adjacent to the District's property identified in the West Coast Assessment Region Unassociated Parcels as Linwood Road (and identified by Lee County STRAP number 22-43-26-01-00006.0000). Mr. Duckworth and his wife also own the three lots immediately south of 1530 Lee Street lot as well (identified by STRAP numbers 22-43-26-02-0000E.0160, 22-43-26-02-0000E.0170, and 22-43-26-02-0000E.0180).

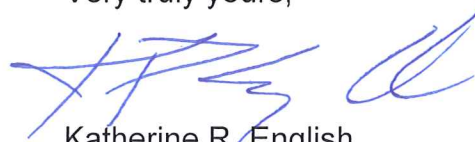
Mr. Duckworth purchased the property at 1530 Lee Avenue in April of 2000 and has owned the property since. The property has an existing site built home and a permitted, existing dock in the C-43 serviced by underground power from the house meter and accessed by a footpath from the house. Until the District began its assessment of surplus lands, Mr. Duckworth was unaware that his property abutted a property owned by the District rather than immediately abutting the right of way of the Caloosahatchee River. Mr. Duckworth owns a boat and uses the dock in question regularly for access to the river and, as side note, he and his wife were married on the dock.

Mr. Duckworth would prefer that the District's ownership and use of the Linwood Road parcel remain unchanged; however, recognizing the District is more likely to determine that the Linwood Road parcel is not needed for its mission, he respectfully requests that the District consider entering into arm's length negotiations with him for the sale of a portion of the property. As the owner of the property immediately adjacent to that portion of the Linwood Road parcel lying between his northern property boundary and the right of way line of the C-43. Mr. Duckworth is willing to consider the purchase of that portion of the parcel at its fair market valuation as determined by appraisal. (See marked aerial).

Auctioning the property to the public at large serves no greater public purpose. To the contrary, such a sale, particularly if Mr. Duckworth were unsuccessful, would instead be extremely disruptive to Mr. Duckworth's existing use of his property and his dock without providing any benefit to the District. The alternative proposed by Mr. Duckworth would allow the District to dispose of that portion of the Linwood Road parcel in a financially reasonable manner without the damage to Mr. Duckworth's existing uses or property values.

Based on the foregoing, Mr. Duckworth requests that the District staff recommend to the Governing Board that this portion of the Linwood Road property, if determined to be surplus, be subject to the process for the release of excess right of way or canal easement to the adjacent landowner rather than a sale at auction. If staff requires additional information in developing its recommendation to the District's Governing Board in regard to the Linwood Road parcel, please contact me at your convenience. Thank you for the opportunity to comment on this matter and we look forward to the District's consideration of Mr. Duckworth's requests.

Very truly yours,



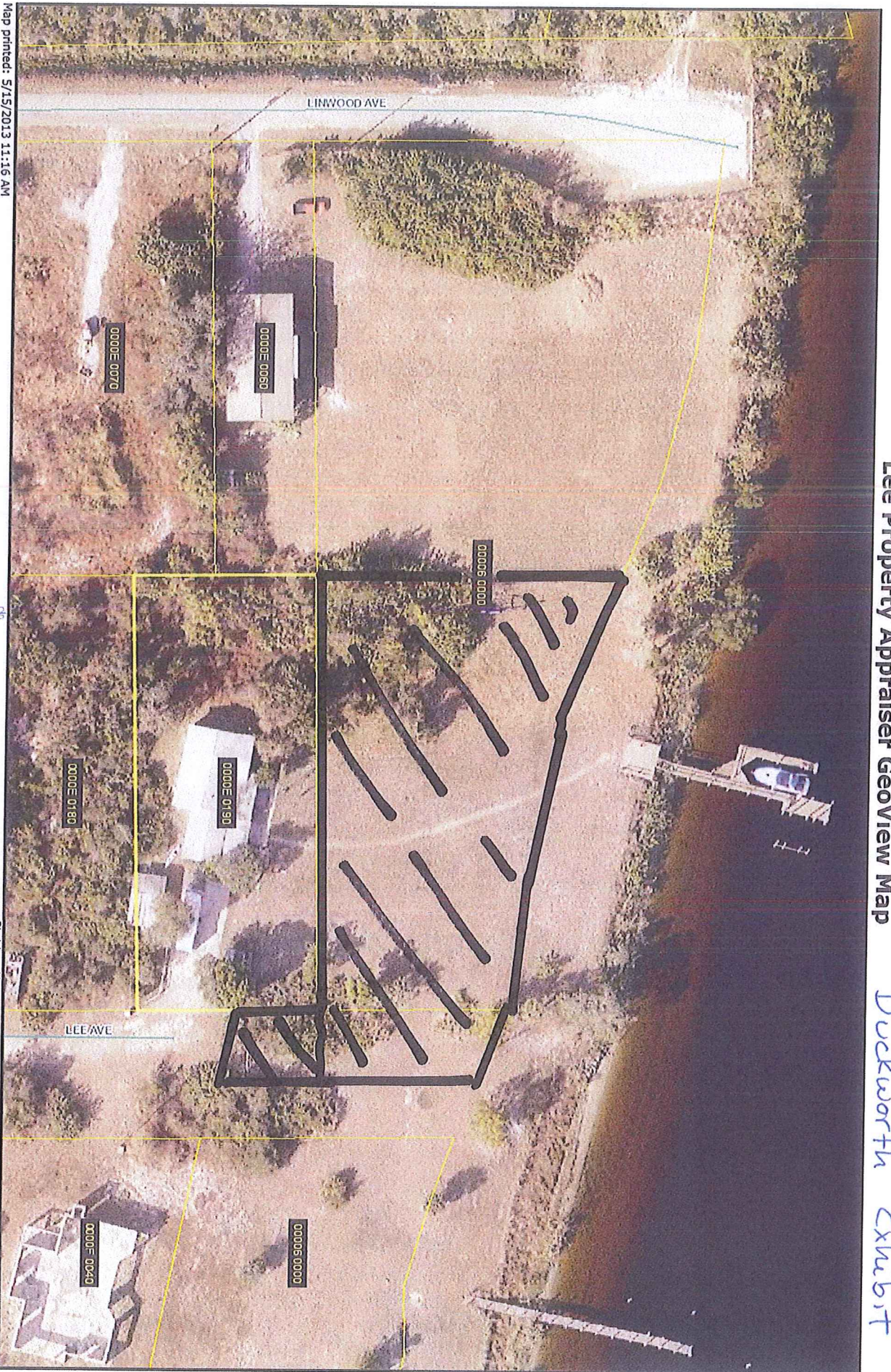
Katherine R. English

KRE/ss
Enclosure

cc: Mr. and Mrs. John Duckworth

Lee Property Appraiser GeoView Map

Duckworth Exhibit



Map printed: 5/15/2013 11:16 AM



Aerial Imagery 2012 Hi-Res (1/2 foot) Parcels and Streets

Parcel Lines

Street Centerlines

Delinquent Tax Parcels

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