South Florida Wildlands Association
1314 East Las Olas Blvd., #2297
Fort Lauderdale, FL 33301

March 27, 2024

Michael L Taylor
Attention: District Engineer
Fort Myers Permits Section
1520 Royal Palm Square Boulevard, Suite 310
Fort Myers, Florida, 33919

Re: South Florida Wildlands Association comments on application # SAJ-2021-02795 (SP-MLT).
Sent via electronic submission to Michael.L.Taylor@usace.army.mil

Dear Mr. Taylor:

South Florida Wildlands Association (SFWA) appreciates the opportunity to provide these comments on a 404 application to the Army Corps of Engineers (ACOE). The applicant is Timothy Oak representing Neal Communities.

SFWA is a regional environmental organization with a focus on the conservation of wildlife and habitat in the Greater Everglades. We began operations in March of 2010 and, in the 14 years that followed, have worked on dozens of projects with the potential to destroy, degrade, and fragment wildlife habitat in our area of focus.

The application of concern in these comments is labeled SAJ-2021-02795 (SP-MLT). ACOE describes the project work as follows:

PROPOSED WORK: The applicant proposes to construct a residential community consisting of multi-family homes with an amenity center, roads, a surface water management system, and a 167.78-acre wetland/upland enhancement and restoration area. The proposed project would

result in impacts to 16.70 acres of waters of the United States, including 13.52 acres of wetlands, 3.05 acres of other surface waters, and 0.13-acre of surface water.

The location of the project is described below:

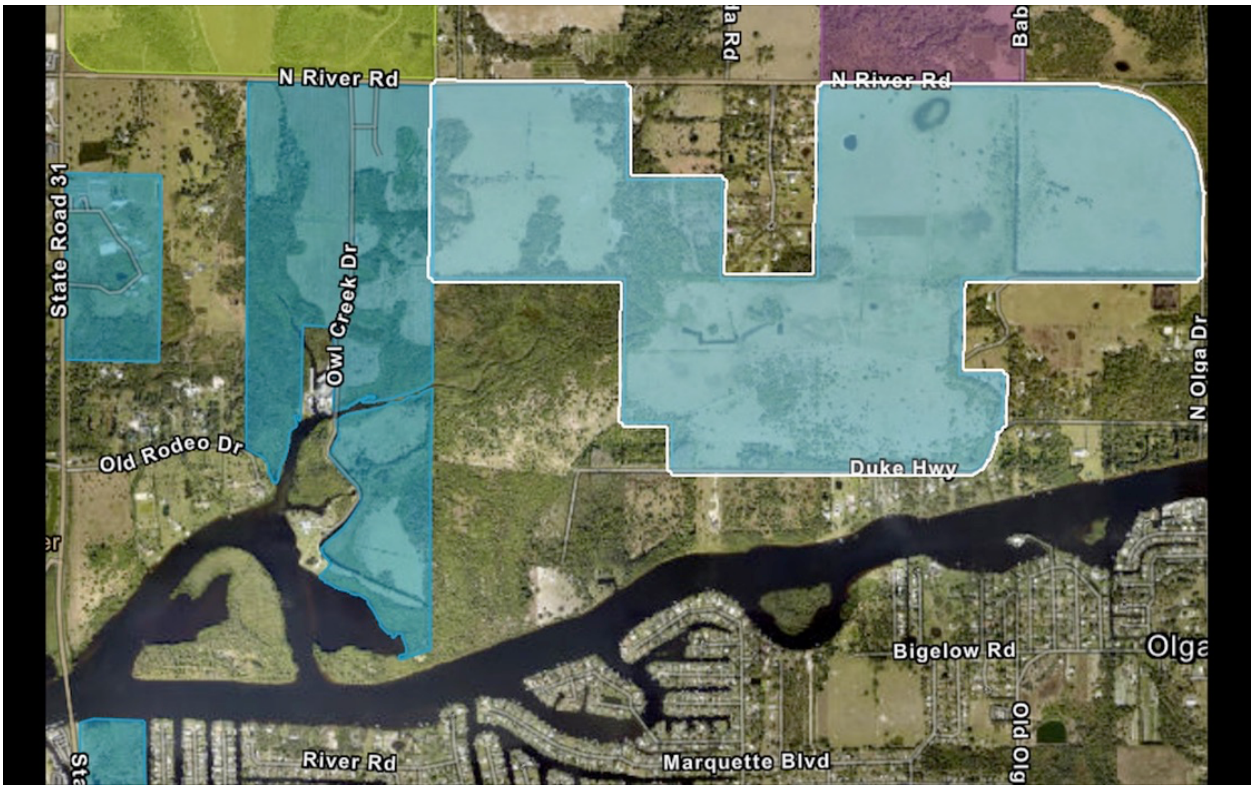
WATERWAY AND LOCATION: The project would affect waters of the United States, including wetlands, associated with Owl Creek, Trout Creek, Caloosahatchee River, and the Caloosahatchee Watershed (HUC 8: 03090205). The project site is located on three (3) adjoining undeveloped parcels located at: 12850 North River Road (18-43-26-00-00002.0020), 18420 North River Road (STRAP 18-43-26-00-00002.0000), and 17900 North River Road (19-43-26-00-00002.1020), in Sections 18 and 19, Township 43 South, Range 26 East, Alva, Lee County, Florida.

The project consists of 342.68 acres with 168.41 acres to be left as open space. Up to 380 housing units will be constructed on the site.

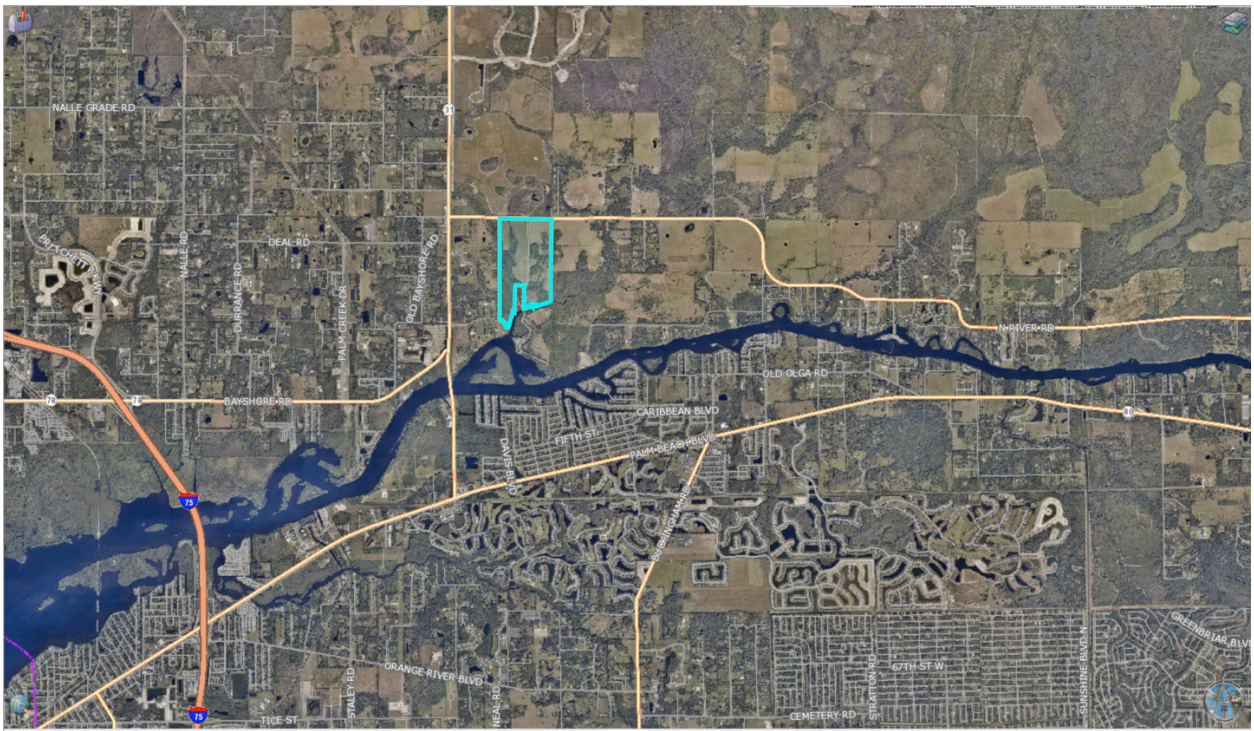
According to the Federal Emergency Management Agency (FEMA), the entirety of the property is in a Special Flood Hazard Area (SFHA). It is located in the coastal floodplain and is designated by FEMA as Flood Zone AE with a strong risk of flooding and mandatory flood insurance requirements.

In looking up the specific locations for the STRAP numbers provided above in the Lee County Property Appraiser's website, one of the first things we noted is that the three parcels are nearly completely undeveloped at this time and are surrounded by other similarly undeveloped properties. In their current state, the parcels provide maximum connectivity between local wetlands and the important federally jurisdictional waters of the Caloosahatchee River and the Caloosahatchee Estuary further downstream. The parcels also represent intact and interconnected wildlife habitats and corridors – an increasingly rare feature in rapidly-growing Southwest Florida.

The property maps posted below were taken from the Lee County Property Appraiser using the STRAP numbers provided by ACOE. The maps underscore the natural qualities of the parcels in their current state. We're also posting an overview map of the area between North River Road and the Caloosahatchee River which shows two other proposed and potential developments east and west of Owl Creek as well as a map from a realtor showing all three parcels on Owl Creek together. The map indicating wetlands is a screenshot from the U.S. Fish and Wildlife Service's (FWS) Wetlands Mapper and illustrates the large tracts of intact wetlands in the vicinity of Owl Creek.

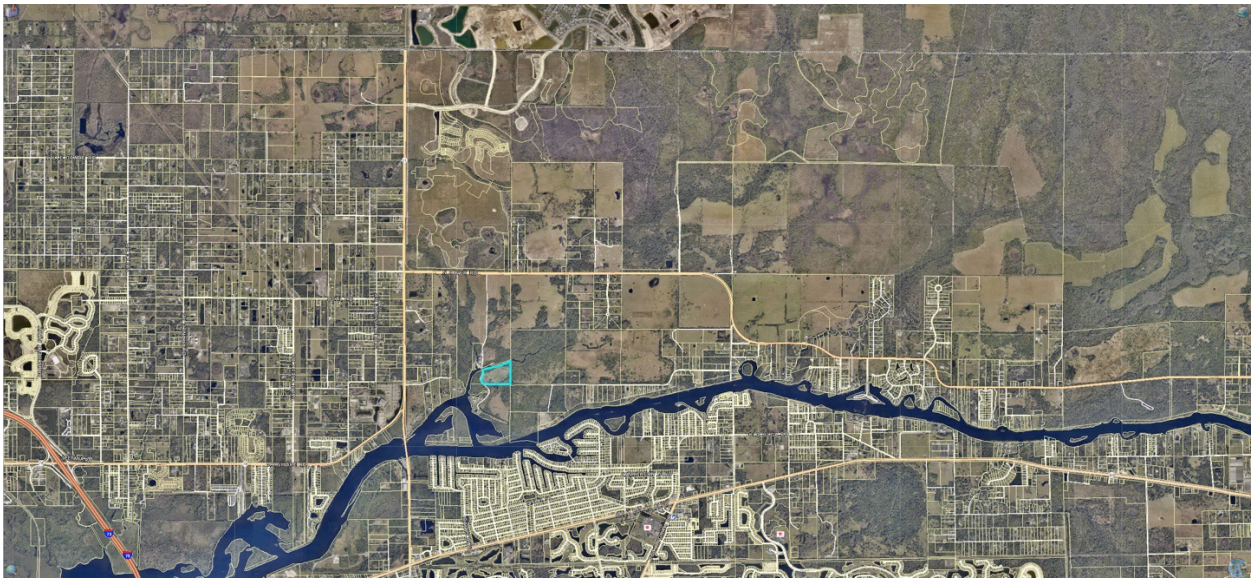


Map showing the Owl Creek development with the much larger proposed Cary-Duke-Povia property to the east (proposed 1,099 units of development).

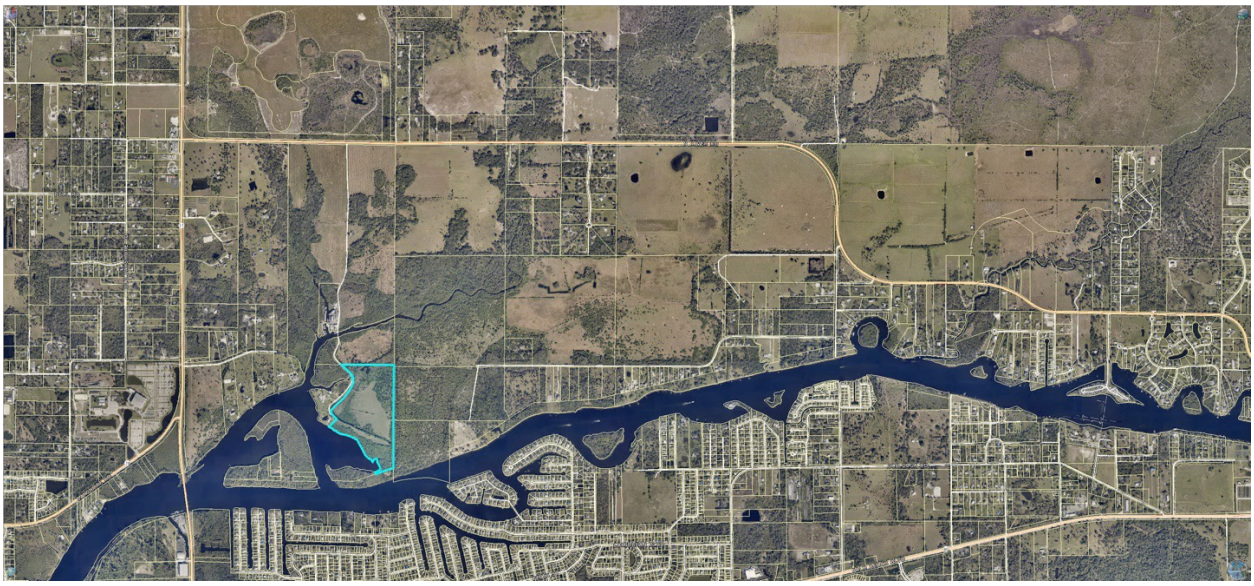


STRAP	Folio	Owner Name	Site Address	Last Trans. Date	Last Trans. Amt	Just Value	Taxable Value
18-43-26-00-00002.0020	10297512	TAKODA LAND GROUP LLC	12850 N RIVER RD, ALVA	5-2023	$ 5,500,000	$ 6,956,200	$ 73,975

Owl Creek – Parcel 1



Owl Creek – Parcel 2

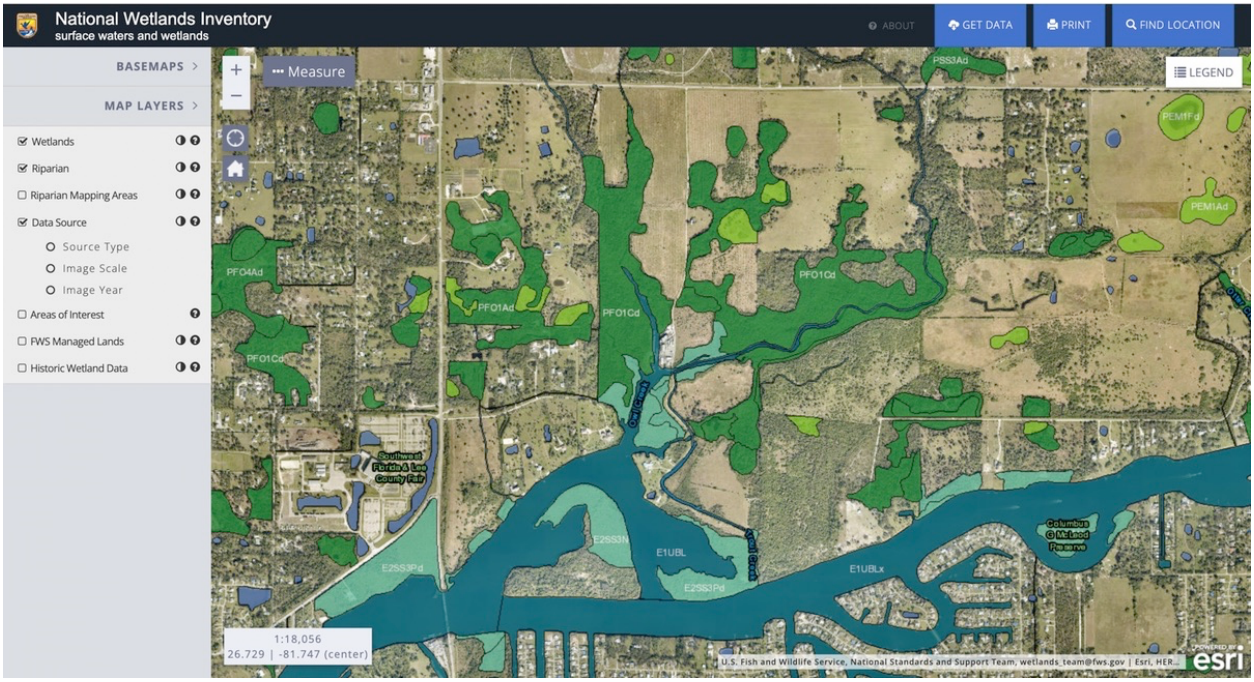


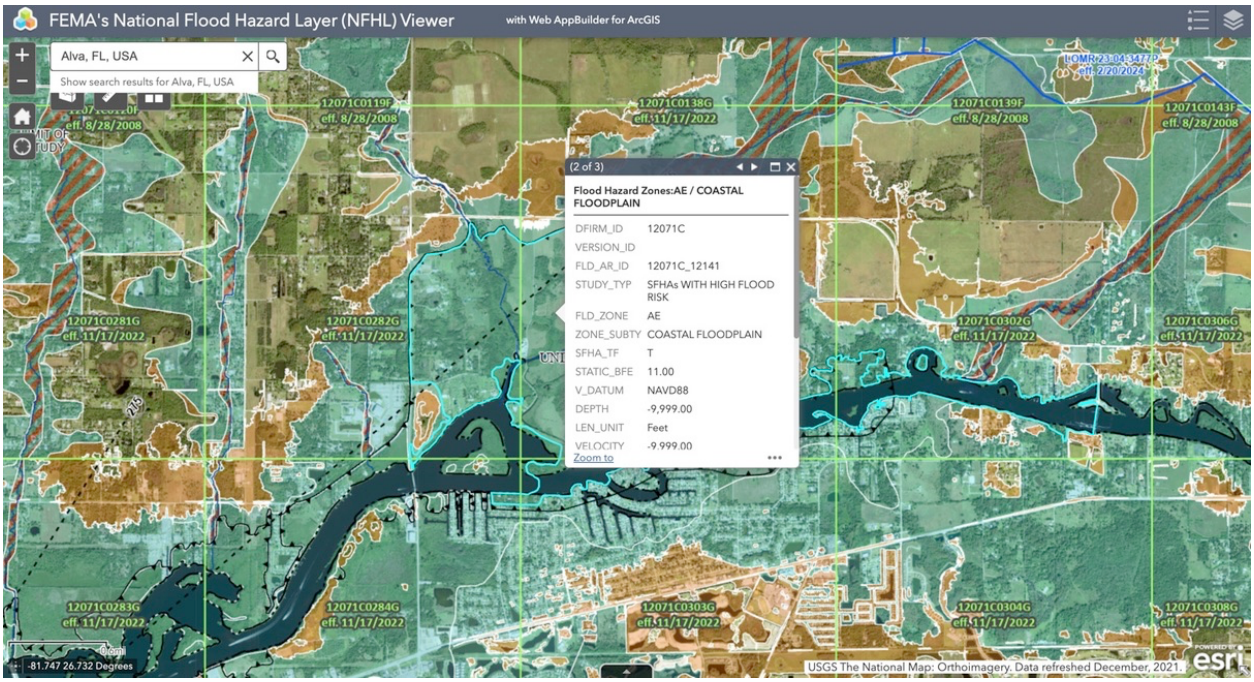
Owl Creek – Parcel 3

Map showing how all three parcels fit together from a real estate agency that had formerly listing the property for sale.

When we examined these same parcels in the FWS's Wetlands Mapper, we saw the extensive network of wetlands found by the Service. We assume that the wetlands indicated on this map have either already been evaluated by the Army Corps for jurisdictional federal wetlands or that the ACOE is in the process of doing that now. The graphic from the Wetlands Mapper showing likely jurisdictional wetlands is shown on the following page. The map itself can be accessed here:

https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/





The above map is a screenshot from FEMA's National Flood Hazard Layer (NFHL) viewer. The map shows that the entirety of the Owl Creek property lies in the coastal floodplain, has a high flood risk, and is designated as lying within a Flood Zone AE - high risk of flooding and mandatory flood insurance requirements. The likelihood that these jurisdictional wetlands and waterbodies such as Owl Creek will be impacted by flooding and polluted runoff – becoming more and more prevalent as climate change takes hold – is another major consideration in ACOE's permitting of the Owl Creek project.

FEMA's National Flood Hazard Layer viewer can be accessed here:

https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html?id=8b0adb51996444d4879338b5529aa9cd

As all the above maps indicate, the property currently provides significant roadless areas that support the movement and presence of native wildlife. In the ACOE document describing the application, the Corps provides a small summary of its current efforts to evaluate impacts to federally listed wildlife species that utilize the Owl Creek property.

ENDANGERED SPECIES: The project is located within the consultation areas for the West Indian manatee (*Trichechus manatusand*), Smalltooth sawfish (*Pristis pectinate),* Florida bonneted bat (FBB) (*E. floridanus*), Red-cockaded woodpecker (RCW) (*Leuconotopicus borealis*), Florida scrub jay (*Aphelocoma coerulescens*), Audubon's crested caracara (*Caracara plancus cheriway*), American crocodile (*Crocodylus acutus*), Wood stork (*Mycteria americana*), and the Eastern indigo snake (*Drymarchon couperi*).

The Corps is evaluating any effects to the above listed species. The Corps will request U.S. Fish and Wildlife Service and National Marine Fisheries Service concurrence with determinations pursuant to Section 7 of the Endangered Species Act under separate cover if necessary.

SFWA was also able to obtain a Florida Natural Areas Inventory data set covering the entire block of land between River Road North and the Caloosahatchee River in the vicinity of Owl Creek. The data set contains a list of wildlife species that have been documented on the site or are expected to be present based on habitat modeling and current conditions. The document also notes many listed species where potential habitat exists on the site and that the habitat is within the known range of the species. The full summary list from the FNAI report and the breakdown of species into the above categories can found on the following page. The link below goes to a copy of the full report SFWA received from FNAI:

https://drive.google.com/file/d/1FRSDyQ3CUnt0A5M1khLcLncAHkiGSRwO/view?usp=sharing

1018 Thomasville Road
Suite 200-C
Tallahassee, FL 32303
(850) 224-8207
www.fnai.org

Florida Natural Areas Inventory

Florida Natural Areas Inventory

Aggregated Biodiversity Matrix Report

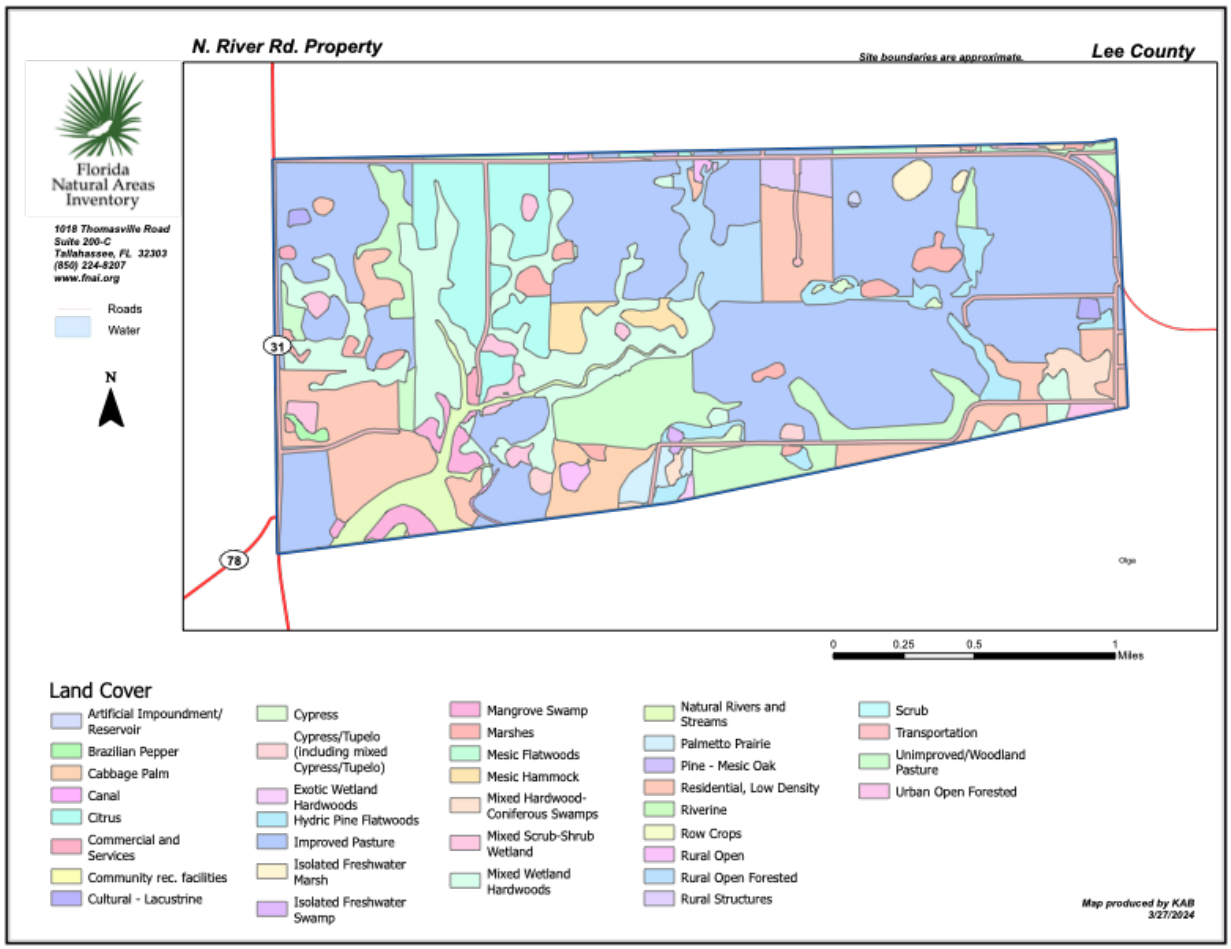
Scientific Name	Common Name	Global Rank	State Rank	Federal Status	State Listing
Documented					
Alligator mississippiensis	American Alligator	G5	S4	SAT	FT(S/A)
Caracara plancus	Crested Caracara		S2	T	FT
Haliaeetus leucocephalus	Bald Eagle		S3	N	N
Sciurus niger niger	Southeastern Fox Squirrel	G5T5	S3	N	N
Likely					
Antigone canadensis pratensis	Florida Sandhill Crane	G5T2	S2	N	ST
Aphelocoma coerulescens	Florida Scrub-Jay	G1G2	S1S2	T	FT
Drymarchon couperi	Eastern Indigo Snake	G3	S2?	T	FT
Dryobates borealis	Red-cockaded Woodpecker		S2	E, PT	FE
Eucanthus alutaceus	Mat Red Globe Scarab Beetle	G2G3	S1S2	N	N
Eumops floridanus	Florida bonneted bat	G1	S1	E	FE
Mesic flatwoods		G4	S4	N	N
Mustela frenata peninsulae	Florida Long-tailed Weasel	G5T3?	S3?	N	N
Mycteria americana	Wood Stork	G4	S2	DL	FT
Pristis pectinata	Smalltooth Sawfish	G1G3	S1S2	E	FE
Puma concolor coryi	Florida Panther	G5T1	S1	E	FE
Rostrhamus sociabilis	Snail Kite	G4G5	S2	E	FE
Sciurus niger avicennia	Big Cypress Fox Squirrel	G5T2	S2	N	ST
Scrub		G2	S2	N	N
Potential					
Acipenser oxyrinchus desotoi	Gulf Sturgeon	G3T2T3	S2?	T	FT
Athene cunicularia floridana	Florida Burrowing Owl	G4T3	S3	N	ST
Bird Rookery		G5	SNRB	N	N
Blarina shermani	Sherman's Short-tailed Shrew	GH	SH	UR	ST
Calopogon multiflorus	many-flowered grass-pink	G2G3	S2S3	N	T
Centrosema arenicola	sand butterfly pea	G2Q	S2	N	E
Coleataenia abscissa	cutthroatgrass	G3	S3	N	E
Corynorhinus rafinesquii	Rafinesque's Big-eared Bat	G3G4	S1	N	N
Deeringothamnus pulchellus	beautiful pawpaw	G2	S2	E	E
Egretta caerulea	Little Blue Heron	G5	S4	N	ST
Egretta thula	Snowy Egret		S3	N	N
Egretta tricolor	Tricolored Heron		S4	N	ST
Eretmochelys imbricata	Hawksbill Sea Turtle	G3	S1	E	FE
Gopherus polyphemus	Gopher Tortoise		S3	N	ST
Lampropeltis extenuata	Short-tailed Snake		S3	PT	ST
Lechea cernua	nodding pinweed		S3	N	T
Linum smallii	Small's flax	G2	S2	N	E
Lithobates capito	Gopher Frog	G2G3	S3	UR	N
Litsea aestivalis	pondspice	G3?	S2	N	E
Matelea floridana	Florida spiny-pod	G2	S2	N	E
Nemastylis floridana	celestial lily	G3	S3	N	E
Neofiber alleni	Round-tailed Muskrat	G2	S2	N	N
Neovison vison pop. 1	American Mink, Southern Florida popu	G5T2Q	S2	N	ST
Nolina atopocarpa	Florida beargrass	G3	S3	N	T
Peucaea aestivalis	Bachman's Sparrow		S3	N	N
Platanthera integra	yellow fringeless orchid	G3G4	S2	N	E
Podomys floridanus	Florida Mouse	G3	S3	N	N
Rallus longirostris scottii	Florida Clapper Rail	G5T3?	S3?	N	N

Definitions: *Documented - Rare species and natural communities documented on or near this site.*
Documented-Historic - Rare species and natural communities documented, but not observed/reported within the last twenty years.
Likely - Rare species and natural communities likely to occur on this site based on suitable habitat and/or known occurrences in the vicinity.
Potential - This site lies within the known or predicted range of the species listed.

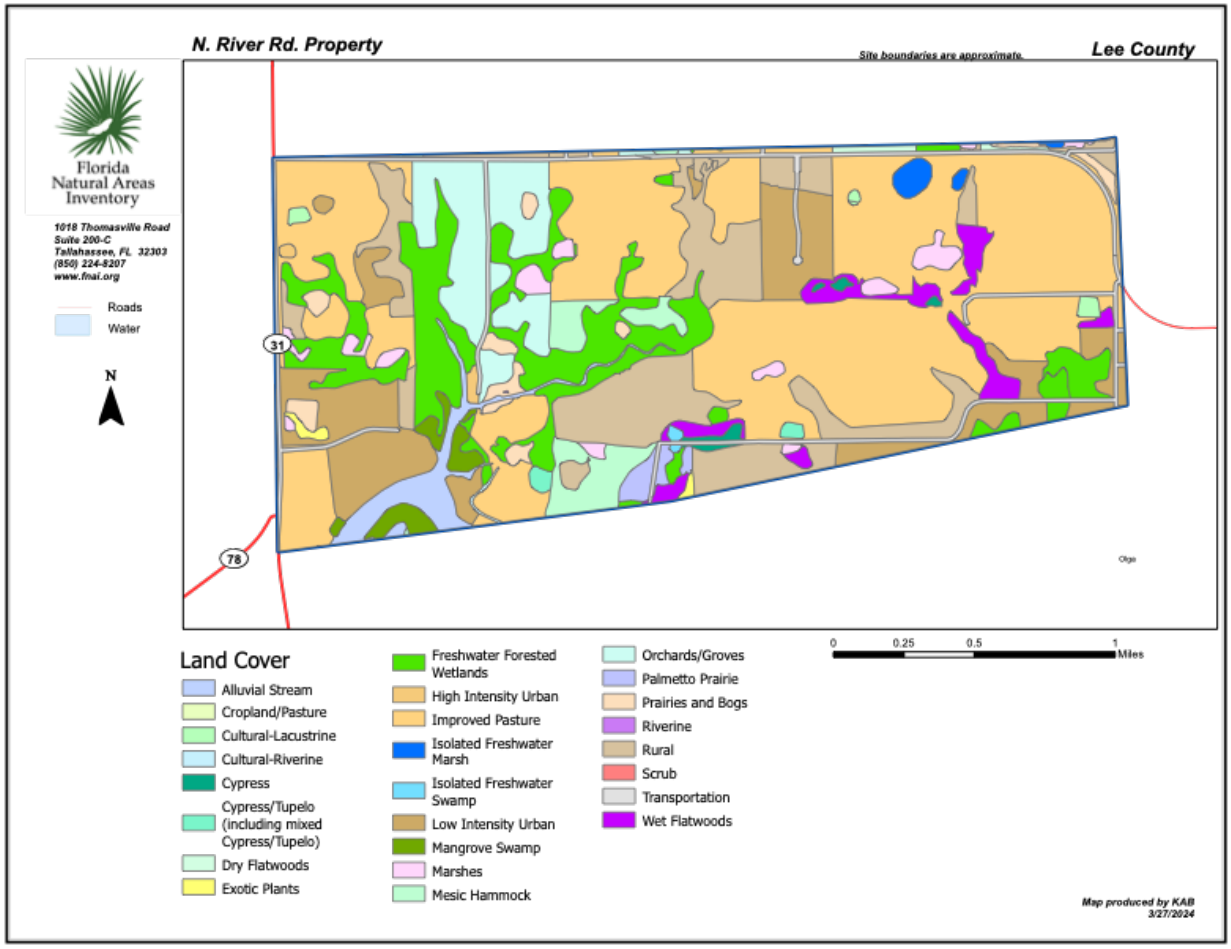
Screenshot of the species summary from FNAI showing species that have been documented, are potentially present, or are likely to be found.

The maps below, also from FNAI, show the mosaic of land cover types that have contributed to the intense of biodiversity of the properties now under consideration for development.

Disrupting this mosaic with dense suburban development is hardly going to be in the interest of wildlife and biodiversity in this special corner of Southwest Florida.

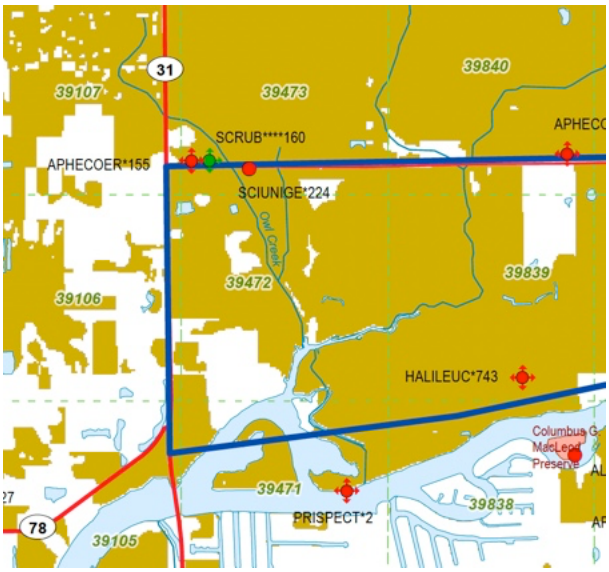


Land cover map 1.



Land cover map 2.

One important note – the federally endangered smalltooth sawfish (Pristis pectinate) has been documented on the Caloosahatchee River a short distance from the oxbow that extends into the property. In a telephone conversation today with Kerri Brinegar, GIS and Data Services Analyst with FNAI, Kerri expressed FNAI's "high confidence" that the smalltooth sawfish is present on the waterways that are a part of the Owl Creek site. See map below showing the element occurrence on the river just east of the oxbow that protrudes into the Owl Creek property.



The entire Owl Creek site is also a part of critical habitat designation for the smalltooth sawfish published by NOAA in 2009. Full announcement here:

https://www.federalregister.gov/documents/2009/09/02/E9-21186/endangered-and-threatened-species-critical-habitat-for-the-endangered-distinct-population-segment-of

The map below shows a screenshot of the portion of the critical habitat that overlays the Owl Creek project (see map on following page). The entire KMZ file can be downloaded and viewed on Google Earth here:

https://www.fisheries.noaa.gov/resource/map/smalltooth-sawfish-critical-habitat-map-and-gis-data

The critical habitat map for the smalltooth sawfish shown here is the eastern portion of the 221,459-acre Charlotte Harbor Estuary Unit. Full description of this habitat from NOAA below:

*We, NOAA Fisheries, issue a final rule to designate critical habitat for the U.S. distinct population segment (DPS) of smalltooth sawfish (*Pristis pectinata*), which was listed as endangered on April 1, 2003, under the Endangered Species Act (ESA). The critical habitat consists of two units: the Charlotte Harbor Estuary Unit, which comprises approximately 221,459 acres of coastal habitat; and the Ten Thousand Islands/Everglades Unit (TTI/E), which comprises approximately 619,013 acres of coastal habitat. The two units are located along the southwestern coast of Florida between Charlotte Harbor and Florida Bay.*

In an article from NOAA in February 2024, the agency describes the mutilation of a smalltooth sawfish (removal of its rostrum) off the coast of Key West. The agency also describes the

current plight of smalltooth sawfish and the extreme importance of the remaining habitat in Southwest Florida to the protection of the species' continued existence and chances of recovery (a key goal of the Endangered Species Act).

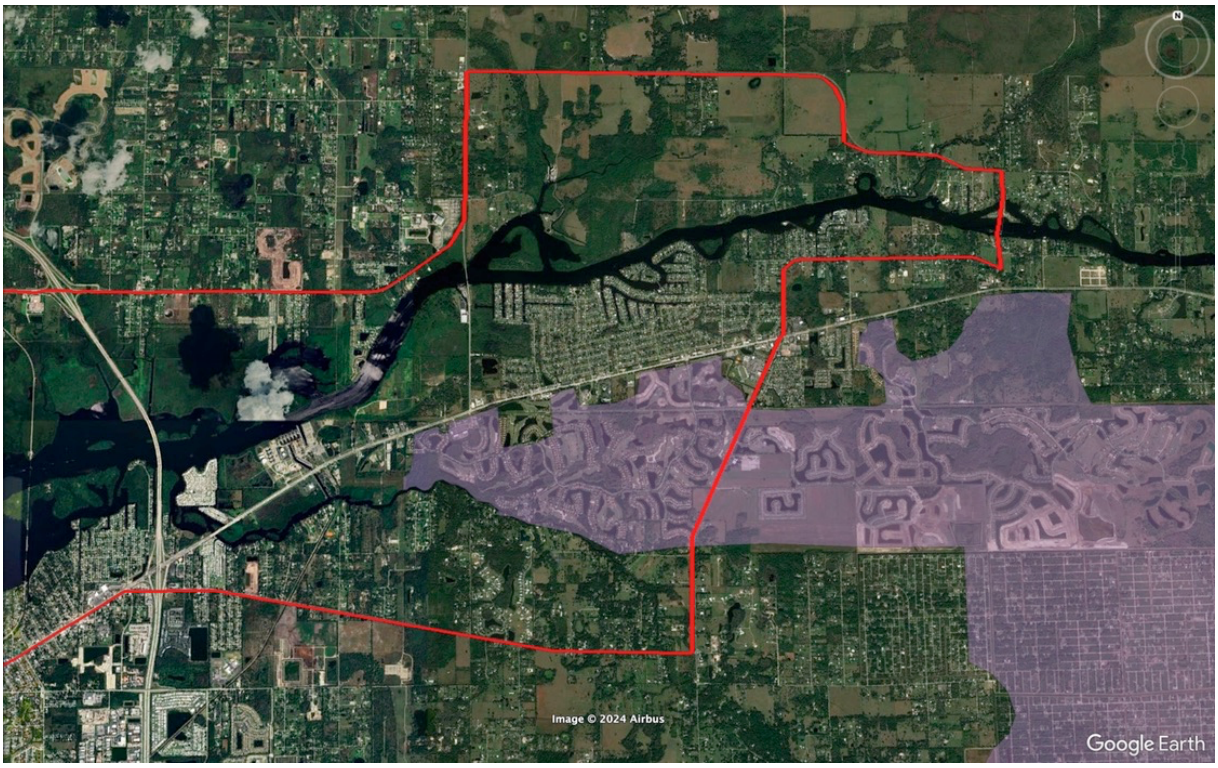
Smalltooth sawfish are listed as endangered under the Endangered Species Act. Once abundant in the Southeast, they are now only found off the coast of Florida, especially southwest Florida where sawfish give birth. They were the first marine fish to receive federal protection as an endangered species in 2003. Under the Act, it is illegal to catch, harm, harass, or kill an endangered sawfish.

We note here that development of the Owl Creek property will likely lead to habitat destruction and disturbance during construction as well as increasing levels of pollution in the sawfish's critical habitat due to a variety of factors. Those include runoff from road construction and site preparation, but also from lawns, vehicles (with a tremendous increase in vehicle trips due to the development), new buildings and construction materials present on site. There is no question that the U.S. Fish and Wildlife Service will need to evaluate the impacts and determine what level of incidental take is likely to occur. Given the location of the property near wetlands that connect directly to the habitat for the smalltooth sawfish, we believe take (as defined by the Endangered Species Act) is a virtual certainty for the sawfish. The construction of this project can lead to harm, harassment, or death for a critically endangered species. That would also include interference with foraging activities and impacts to the habitat the species currently forages within.

This is coming at a particularly bad time for the sawfish as the species is currently subjected to a new disease that leads to strange "spinning" behavior and often death. As this article from National Geographic points out, the cause is currently unknown. However, there is possibility that a toxin found in algae is the culprit – and the article notes that this algae's growth is facilitated by poor water quality and conditions. Water quality in all coastal habitats in Florida is known to have degraded as development has increased. It is almost always a risk factor for disease in terms of lowering marine wildlife's natural resilience. Impacts include blocking sunlight, death and degradation of aquatic vegetation, loss of small prey for larger predators, algal blooms (a huge existing problem in the Caloosahatchee River and Watershed), increase in nutrient runoff, and chemical and heavy metal exposures. The construction of Owl Creek and other properties in this same area will exacerbate all these problems.

Article from National Geographic can be found at the link below:

https://www.nationalgeographic.com/animals/article/spinning-fish-sawfish-florida-toxins-diseases-algae



Map shows the Eastern section of the Charlotte Harbor Estuary Unit – critical habitat for the smalltooth sawfish – overlapping with all of the Owl Creek development.

The Owl Creek project also concerns us regarding impacts to Florida's State Animal, the Florida panther.

FWC's panther mortality map shows approximately 14 panthers killed by vehicles on and around SR 80 between I-75 and LaBelle. Of those, 100 percent died due to "vehicle trauma." SR 80 runs only about 1 to 2 miles south of the proposed project site. The Caloosahatchee River is no obstacle for a panther and residents have reported panthers in and around the Owl Creek site. Considering the rural and largely roadless nature of the site and its proximity to known panther habitat, it would be unusual if panthers didn't make explorations of what they would consider potential habitat. Panther mortality locations can be viewed at the map below:

https://geodata.myfwc.com/datasets/myfwc::florida-panther-mortality/explore

With the above observation in mind, it is important to point out that the U.S. Fish and Wildlife Service funded a research study just before the construction of the Town of Babcock Ranch. Understanding that the existing core panther habitat south of the Caloosahatchee River was of limited spatial extent, the study compared and evaluated large roadless blocks of land north of the Caloosahatchee River. The study was commissioned by the FWS and was later published in the peer-reviewed Journal of Mammalogy. From the abstract:

“One of the goals of the Florida panther (Puma concolor coryi) recovery plan is to expand panther range north of the Caloosahatchee River in central Florida. Our objective was to evaluate the potential of that region to support panthers.”

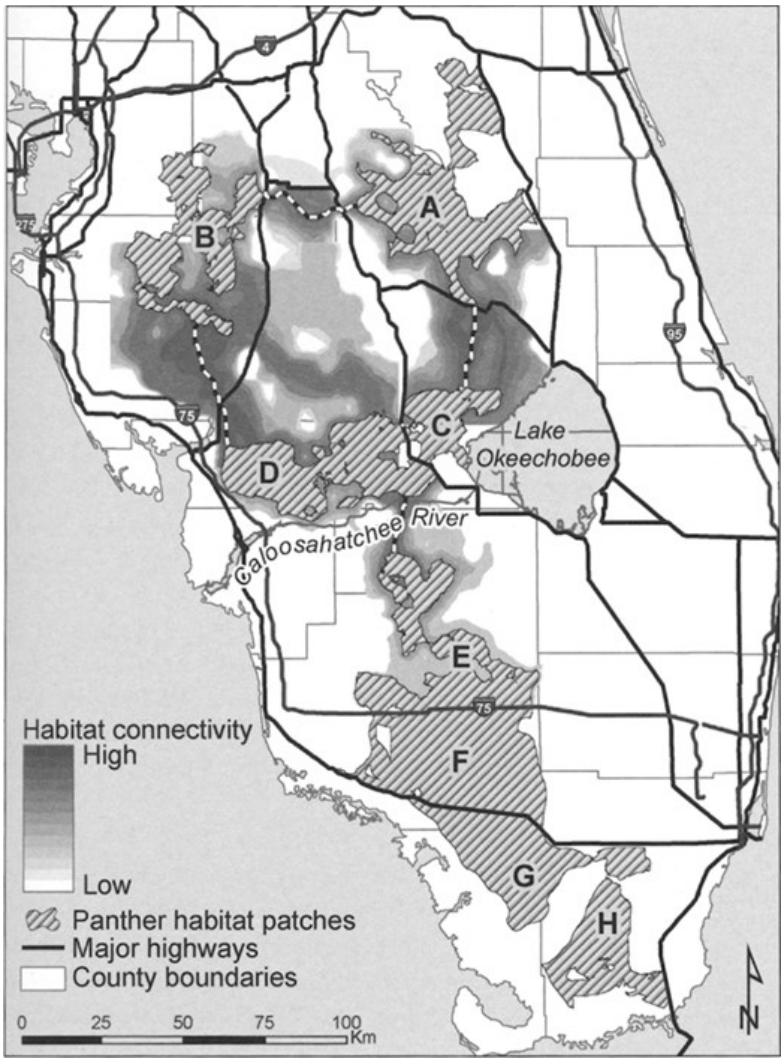
The entire article can be downloaded at the link below:

https://academic.oup.com/jmammal/article/90/4/918/851866?login=false

Though the quality and size of the various habitats examined were important, a lot of weight was also put on the ability of an expanded habitat to be functionally connected to the existing core habitat in Southwest Florida south of the Caloosahatchee River. And that is where the area we are presently discussing was singled out. It is also important to note that the article was published in 2009 – approximately 6 years before construction began on the Town of Babcock Ranch. At the time the article was written, the entire Babcock/Webb Wildlife Management Area (WMA)-Babcock Ranch-Fisheating Creek WMA complex was completely undeveloped. Though the Babcock-Webb portion was second in size to Avon Park (in terms of habitats north of the Caloosahatchee) in the study, 1,289 square kilometers compared to 1,558 square kilometers for Avon Park, it was far closer to the northern limit of the core panther habitat in the Okaloacoochee Slough Wildlife Management Area and State Forest. If the Fisheating Creek habitat was added on – 478 square kilometers – then it was largest habitat patch of all.

The map below from the article illustrates what we have described above. A link to the entire article can be found below:

https://academic.oup.com/jmammal/article/90/4/918/851866?login=false



Map above shows undeveloped land that is viable panther habitat along the northern border of the Caloosahatchee River. Panthers are moving across the Caloosahatchee River now – it is our responsibility to see that they have some places left to go when they get there.

While we cannot undo history at this point, the Town of Babcock Ranch has now been built in the middle of the expansion habitat described above, we are under no obligation to complete the destruction and degradation of the habitat that took place. We believe the Owl Creek property is still potential habitat for panthers – but it is certainly habitat for the numerous species of wildlife described above. It is not in the public interest to degrade this still-rural portion of Southwest Florida containing habitat for rare and federally listed wildlife species. Filling in this still-rural area with more housing will only put more pressure on development all along the SR 31 corridor and help obliterate the value of this area for wildlife as well as for area residents looking for a small slice of a side of Florida that is in full retreat.

It is also not in the public interest to fill in any federally jurisdictional wetlands on the property and to degrade remaining wetlands by putting dense residential development next door to them. Water quality issues in the Caloosahatchee have become legendary – the development

of Owl Creek will only add to those problems. As is, the Owl Creek wetlands clean water that drains into the Caloosahatchee – not only an important ecosystem but a waterbody that is central to public recreation in Southwest Florida. These wetlands also allow for aquifer recharge for area residents and provide habitat for numerous federally and state-listed wildlife species that are of value to all Floridians. We should note here that we are only covering a small slice of potential impacts in these comments. Much more time will be needed by the FWS and the public to investigate and elaborate on what these potential impacts will be to humans and to the broad range of species found on this biodiverse property. Another function of wetlands is their extraordinary ability to hold vast amounts of carbon – also known as carbon sequestration. That carbon is released to the atmosphere once wetlands have been paved over and/or degraded.

A comment from an area resident was picked up in a Gulfshore Business Journal article from last December:

https://www.gulfshorebusiness.com/lee-county-to-vote-wednesday-on-helping-alva-development-with-sewer-extension/

Longtime Alva resident Rob Fowler, who lives on the river just south and east of the planned development, said he wished other county residents would take an interest in the issue.

"It matters because someone that doesn't live in Alva has the opportunity to really explore how Florida really is and was," Fowler said. "It's the only place left in Lee County.

"It's hard to explain how important this issue is. It's not money to me. As I told you, I could have sold this land long ago. I was offered extreme amounts because of the riverfront. Again, it's a way of life. People have to explore and get beyond the gates of their community. Get beyond the beach and come and see real Florida. That's how we live here. That's how we live in Alva."

In contrast to this resident, another long-term resident simply describes development in this area as inevitable:

"There's a thousand people a day moving to Florida, and where are they moving to?" Cary said. "This area of the county has already changed. And it's not us changing it. It's Babcock Ranch. There's going to be a four-lane road built there. We have nothing to do with that. That's a done deal."

We agree with the first resident quoted above. Though it may seem in today's Florida that developments grow out of the ground like trees and grass, we know otherwise. Developments occur because they are permitted. They are not inevitable. Considering all the public interest factors mentioned above, we urge the Army Corps of Engineers to reject this application for a federal wetlands permit for these properties. At the very least, we expect the Corps to hold a public hearing where residents, environmentalists, scientists, and all concerned citizens can voice their opinions and share information central to the Corps' decision.

We're also adding a portion of Lee County's Comprehensive Plan which deals with environmental and wildlife protection. Part of the controversy whirling around this project in this community is that dense development of these highly sensitive and biodiverse lands is in direct contradiction to the guidelines that Lee County has already established. They can be found under the heading of Goal 123 – Resource Protection in the Lee County Comprehensive Plan. The statements are self-explanatory and need no explanation – but we will point out that uplands adjacent to wetlands are also in need of preservation to protect the wetlands they drain into (noted below by Lee County in Policy 123.3.1). The entire Lee Plan can be downloaded the following URL:

https://www.leegov.com/dcd/Documents/Planning/LeePlan/LeePlan.pdf

GOAL 123: RESOURCE PROTECTION. Manage coastal, wetland and upland ecosystems and natural resources in order to maintain and enhance native habitats, floral and faunal species diversity, water quality, and natural surface water characteristics.

OBJECTIVE 123.1: RESOURCE MANAGEMENT PLAN. Continue to implement resource management policies and regulations that ensure the long-term protection and enhancement of the natural upland and wetland habitats by retaining the interconnectedness and functionality of the hydroecological systems in order to progress towards a more ecologically productive and sustainable environment. (Ord. No. 94-30, 00-22, 18-28)

OBJECTIVE 123.3: WILDLIFE. Maintain and enhance the fish and wildlife diversity and distribution within Lee County for the benefit of a balanced ecological system. (Ord. No. 94-30, 18-28)

POLICY 123.3.1: Encourage upland preservation in and around preserved wetlands to provide habitat diversity, enhance edge effect, and promote wildlife conservation. (Ord. No. 18-28)

POLICY 123.3.2: Participate in the development of a regional plan to identify and protect areas utilized by wildlife, including panthers and bears, so as to promote the continued viability and diversity of regional species. (Ord. No. 92-48, 18-28)

OBJECTIVE 123.3: WILDLIFE. Maintain and enhance the fish and wildlife diversity and distribution within Lee County for the benefit of a balanced ecological system. (Ord. No. 94-30, 18-28)

In terms of how this project could possibly be of service to the public interest, we are at a complete loss. The project destroys and degrades wetlands in the basin of the Caloosahatchee River - a water body that badly needs ecological protection as opposed to more development. It destroys, degrades, and fragments habitat for rare and federally listed wildlife species – a resource much appreciated by the residents of Southwest Florida and of Florida as a whole. In terms of our State Animal, the Florida panther, the project virtually wipes out the suitability of a swath of undeveloped land that a U.S. FWS-sponsored study has already identified as part of a

corridor that gives panthers a chance to expand their range outside the very limited terrain they have left south of the Caloosahatchee River. The project will likely degrade critical habitat for the critically endangered smalltooth sawfish. The project will also add a considerable number of daily traffic trips to this area, making it considerably more dangerous for all area wildlife. While some of that traffic will head south across the Caloosahatchee, some part of it will head north on SR 31 – a highway that cuts across the Webb-Babcock Wildlife Management Area and the Babcock Preserve, impacting the ecological value of those important public lands. Increased traffic will also impact local public lands that are nearby – including the Caloosahatchee Regional Park.

On the other side of the equation, it is hard for us to identify any benefit other than the ability of the developer to make money selling new homes.

We again urge the Army Corps to deny this application. At the very least the ACOE should host a public meeting where all the issues raised in this letter and elsewhere can be discussed in an open public forum. The two visions for this and other nearby properties could not be more different. If business continues here as it has in this region for decades, we will see a sensitive, intact ecological area transformed into more run-of-the-mill Florida sprawl. That's a bad tradeoff and not in the public interest.

Best regards,

Matthew Schwartz
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