

# DR/GR Position Statement

The undersigned organizations maintain our urgent concern over the continuing loss of natural resources within the Density Reduction/Groundwater Resource area (DR/GR) in advance of a comprehensive planning effort.

In August 2006, our groups requested that Lee County initiate a comprehensive study of the DR/GR. We appreciate the direction that was given at that time to undertake a compilation of the already existing data on the DR/GR and to identify gaps that should be studied further.

Once completed, we envisioned the data assessment would provide a foundation for a comprehensive study of potential policies for the DR/GR, resulting in identification of appropriate lands for natural resource protection, residential, agricultural and mining uses.

As development pressure continues to build within the DR/GR, it is critical to have proper information at hand in order for the County to adopt appropriate policies and to use appropriate planning tools when considering development approvals.

The McLane Study Assessment (Study) has provided an objective overview of the environmental resources currently located within the DR/GR. It has reinforced the fact that this area is a cohesive unit and is important in its entirety for water recharge, habitat connectivity, flow ways, restoration and connections to downstream resources. We believe the Study supports our position that when land use decisions are made within the DR/GR, due to resource connectivity, protection of area's natural resources cannot occur without a sound plan in place.

We commend Lee County for commissioning this Study to compile and analyze previously available information. Now we urge Lee County to use this Study as a catalyst to fill in the gaps in data and to begin improving our comprehensive planning strategies for rural lands.

The McLane study identifies the following DR/GR information gaps:

- Potential saltwater intrusion impacts on wells located in the area
- The absence of a concise hydrologic water budget for the DR/GR lands
- Potential groundwater quality impacts associated with certain land uses
- Potential hydrologic and ecological impacts associated with mining
- Hydrologic, water quality and ecological impacts associated with agricultural use of the lands.

Additional research should be undertaken to fill in these identified data gaps. Concurrently, Lee County should initiate a planning effort to begin formulating policies that could improve the protection of the essential DR/GR resources. Specific suggestions for both efforts are attached.

Unfortunately, the process of data analysis and planning proceeds slowly while the rate of permit and rezone applications within the DR/GR is accelerating. In 2002, a total of **5,500** acres of land had been approved for mining in Lee County. In the last 5 years that acreage has nearly doubled: **5,000 additional** acres have been permitted for mines. Today, applications to approve mining activities on more than **3,000 additional** acres are being reviewed by the County. Other DR/GR landowners have declared their intent to mine more than **13,000 additional** acres.

In addition, at least one Comprehensive Plan Amendment, encompassing hundreds of acres and requesting substantial gifts of increased density, is being reviewed within DR/GR lands. The County is contesting the South Florida Water Management District's approval of a four mile ditch through a high quality wetland section of the DR/GR. Federal funding has been provided for a study of a new I-75 interchange with great potential for opening up a large section of the DRGR for more intensive development.

The initial purpose of designating the DR/GR was to keep density lower within the more rural areas of Lee County while protecting future drinking water supplies. However, the Study has confirmed what scientists have known for years, which is that the DR/GR is also important because of the ecological services it provides. Such services include habitat value, hydrologic features and their connectivity to areas both within and outside the DR/GR and the importance of maintaining the integrity of the DR/GR in order to preserve an interconnected mosaic of habitats.

The need to protect at a landscape scale and realize the beneficial ecological services of the DR/GR cannot occur if applications continue to be approved in a project-by-project, piecemeal fashion, without an assessment of how such development impacts the natural resources of the surrounding area and satisfies the compatibility requirements of Lee Plan. Our organizations request Lee County to declare a interim policy of deferring approval of rezonings, Comprehensive Plan amendments, and mining applications until such comprehensive planning is completed and programs are implemented to satisfy the needs of ecological functions, water recharge and appropriate land uses within the DR/GR.

Our organizations:

Brooks Concerned Citizens  
Collier County Audubon Society  
Conservancy of Southwest Florida  
Corkscrew Rural Community  
Council of Civic Associations  
Estero Civic Association  
Estero Council of Community Leaders  
Florida Wildlife Federation  
National Wildlife Federation  
Responsible Growth Management Coalition  
The Community Action Group of the Villages of Country Creek  
Wildcat Run Community Association

## **Information Gaps and Planning for Rural Lands-DR/GR Policy and Decision-making**

### McLane Compilation Study Findings

The “Review and Summary of Studies Containing Information Relating to Density Reduction / Groundwater Resource (DR/GR) Lands Southeastern Lee County, Florida” presented to the Board of County Commissioners by McLane Environmental on June 11<sup>th</sup> noted the following information gaps on page 62 of the report (the underlines have been added for emphasis):

*“The review also revealed that there were a few major components of the overall character of the DR/GR lands that were not described in sufficient depth in the documents reviewed as part of this project to permit the project team to evaluate their importance or significance. For example, while one of the earlier water resource studies made brief mention of potential saltwater intrusion impacts for wells in southeastern Lee County, none of the studies provided more detail on this subject. Similarly, none of the studies provided a concise hydrologic water budget for the DR/GR lands. These elements, missing in the documents reviewed, may be addressed in other documents, studies, and reports beyond those reviewed by the project team.*”

*“Several of the studies mentioned potential groundwater quality impacts associated with certain land uses, but did not present a current background data set against which future groundwater quality changes could be measured. One of the studies described potential hydrologic impacts associated with mining, but none of the studies described potential ecological impacts. In addition, while several of the documents mentioned agriculture as a permitted DR/GR land use, they did not provide information on the hydrologic, water quality, or ecological impacts associated with agricultural use of these lands.”*

In the absence of reliable information on these topics, Lee County cannot fully determine how important each one is for the future management of DR/GR lands in southeastern Lee County.

### Spikowski-Erwin Information Gap Analysis

Bill Spikowski, former Lee County Growth Management Director, and Kevin Erwin, a local ecologist with clients throughout the world, have recently also worked to identify DR/GR and rural Lee County information gaps and have been considering what kinds of planning efforts could help Lee County advance its planning for DR/GR lands. Their expertise and years of experience in Lee County produced the following suggested tasks for filling data gaps and for improving development review and planning in the DR/GR and other rural lands in Lee County.:

- Analyze the existing application and approval requirements for rezoning, mining, and agricultural clearing submittals. Determine any gaps and analyze appropriate methodologies for collecting essential information to fill any gaps, with particular attention to southeast Lee County. Determine whether changes to current regulations may be needed and draft appropriate land development code amendments.
- Analyze the major land uses in southeast Lee County such as residential development, mining, agriculture, and conservation lands. Analyze at least the following levels; already constructed; approved but not constructed; and pending or imminent applications.
- Formulate potential land-use that might help achieve a sustainable mosaic of preserved lands, agricultural uses, mining operations, and rural land uses in the Density Reduction / Groundwater Resource area. This task is intended to stimulate a community discussion that may lead to amendments to the Lee Plan.
- Prepare an accurate existing land use map and cover map using the Florida Land Use and Cover Classification System (FLUCFCS) at no less than Level III for both current and historical conditions. Tabulate all results by watershed and include hydric soils mapping.
- Expand a ground and surface water monitoring network within each watershed that focuses on a variety of land use types including native uplands and wetlands, commercial and residential development, and mining.
- Prepare a water budget and estimate minimum flows, current and historical (pre-development) water levels for select streams and wetlands within each watershed.
- Conduct an evaluation of commonly accepted scientific hydrological modeling systems currently used to assess a variety of land use activities. Determine if these modeling systems represent the best available science for understanding the impacts of activities, including but not limited to residential development, agriculture and mining.