

# APPENDIX H H

TO: Tom Greenwood  
FROM: Judith Hushon, EAC Vice Chair  
SUBJECT: Comments on RLSA Phases 1 and 2  
DATE: February 27, 2008

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## Three comments on the Phase 1 report:

1. It was requested that the table of sources used to compute the NRI for the first five years of the RLSA Program be attached as an appendix and referenced in Section 3 and the Definitions section. I still think this would be a good addition. This table is currently available on the County RLSA website.
2. There should be a discussion of the mitigation efforts/requirements met to accommodate development to date (e.g., wetland mitigation credits, panther credits).
3. There is discussion of Ave Maria, but some discussion of Big Cypress, the other new town that is moving through the process should also be included as to what impacts are planned.

## Comments as input to the Phase 2 effort:

1. I don't believe that the NRI, as originally developed, can be taken as gospel—it needs to be tested and re-evaluated as part of this process. Policy 1.9 states that the score will be based on... "the Natural Resource Index values in effect at the time of designation," implying a need to update it regularly. The NRI was developed five years ago by Wilson Miller, but since that time new data have become available that could well lead to different answers. Nowhere is the NRI actually explained—it is presented as a black box with fixed weightings. At least it should be handled in detail in another companion document or as an appendix. There is no explanatory document posted on the RLSA website. There is also the need to re-examine the data upon which the NRI scores are based—for example, there are new panther data and new primary and secondary panther maps. There is also new scrub jay management guidance from FWS. Additionally, it might be a good idea to include a panther map overlay with your maps that appear at the end of the Phase 1 report.
2. There should be more guidance on where towns and villages can be located. As it is written now, it is possible to locate towns near each other with only a small buffer between which encourages sprawl. Without planning, all the density will be located on the western portion of the RLSA. Ideally the towns should be spread out, with large agricultural areas between them. Maybe a maximum number of towns needs to be agreed upon (3?) and the general areas where these can be located indicated on a map. At a minimum, there needs to be more guidance provided as to where towns can be located and their buffering

requirements. This will facilitate all types of future infrastructure planning by the County.

3. Compact Rural Developments (CRDs) seem to be too loosely designated and could provide a loophole for increased development in areas that are already built up. A CRD of 100 acres or less seems to be a meaningless designation and it is my belief that this type of development could be dropped.
4. Panther deaths on 846 are mentioned, but not those on Rte 29 or 41 east, which are many.
5. No differentiation is made between different types of Water Resource Areas (WRAs). Some are much more valuable than others such as cypress domes and emphasis should be placed on maintaining them in their current state in the future.
6. Each new development should have to identify traffic contributions, water usage and other resource requirements at the time they are being planned. You may want to consider the changes in these variables from agriculture to increased density.
7. No emphasis is put on trying to avoid fragmentation of natural areas and the maintenance of corridors.
8. My particular concern is that, as currently implemented, the RLSA program SSAs and SRAs do not come before the Environmental Advisory Committee. These projects are too complex for the Board of County Commissioners to assess without timely inputs from the EAC on relevant environmental issues.
9. Because there are only a few large landowners in eastern Collier County, they are generally using their own agricultural land to offset development on other land that they own (i.e., using their own credits). There is essentially no market for the credits accrued by several small landowners.