

November 8, 2022

Roger Clark
Planning and Zoning Director
City of Venice
401 West Venice Avenue
Venice, Florida 34285

RE: Response to RAI
Project Name: Village at Laurel and Jacaranda

Dear Mr. Clark,

Kimley-Horn has prepared the following responses to Wade Trim's review comments regarding environmental components of the proposed Village at Laurel and Jacaranda project.

- OS 1.2.2 – Environmental Impact Mitigation
 - o Does not account for impacts from offsite drainage and road improvements; does not account for all potential listed species. **Response: The submitted June 2022 Kimley-Horn Environmental Narrative only addresses impacts to occur within parcel identification number 0391-04-1000. The portion of Wetland G that extends directly north of the project area will be addressed with the Laurel Road improvements/widening Environmental Resource Permit (ERP). At which time offsite drainage, storage, treatment, and attenuation, as required per under 62-330.301(1) Florida Administrative Code (F.A.C), will be addressed by the Southwest Florida Water Management District (SWFWMD).**
- OS 1.3.1 – Wetland and Aquifer Recharge Areas Protection
 - o Does not account for impacts from offsite drainage and road improvements; does not document maintenance of natural flow or maintenance of existing vegetation, and more. **Response: As stated above, offsite drainage will be addressed during the SWFWMD (ERP) application submittal for the proposed commercial project and for the widening of Laurel Road. There are two permitted stormwater ponds that currently discharge storage into Wetland G to assist in hydroperiod/aquifer recharge. The remanent portion of Wetland G that is to remain, will be engineered to retain pre-post hydrology. This will be done by providing the 2.33 year mean annual storm hydrographs to ensure that no impacts will occur to the peak stage and duration, as required by Rules 62-330.060(2) and 62-330.301(a)(d) F.A.C.**
- OS 1.3.2 – Wetland Encroachments
 - o Does not account for impacts from offsite drainage and road improvements; does not identify and delineate all wetland boundaries **Response: The submitted June 2022 Kimley-Horn Environmental Narrative only addresses impacts to occur within parcel identification number 0391-04-1000. The portion of Wetland G that extends directly north of the project area will be addressed with the Laurel Road improvements/widening Environmental Resource Permit. At which time offsite drainage, storage, treatment, and attenuation as required by 62-330.301(1) Florida Administrative Code (F.A.C) will be reviewed and approved by the Southwest Florida Water Management District.**

- OS 1.4.2 – Protection of Native Habitats and Natural Resources
 - o Does not account for all potential listed species; does not document preservation or protection of significant habitat; does not demonstrate lower quality habitats were considered for impact before higher quality habitats and resources. **Response: No listed species have been observed utilizing the project area. Environmental Scientists with Kimley-horn have completed numerous wildlife surveys of this property and surrounding properties over a 10-year period. The applicant will be required to coordinate with the Florida Fish and Wildlife Conservation Commission (FWC) during the State ERP review process. Any wildlife concerns that arise from FWC coordination will be addressed at that time. Given that most of the proposed development area is wetlands and the proposed commercial project requires a large contiguous footprint, avoidance of significant habitat is not possible.**
- OS 1.4.3 – Endangered or Threatened Species
 - o Does not account for all potential listed species; does not identify the habitat of listed species; does not document that habitat fragmentation will be minimized
Response: Kimley-Horn's Environmental Scientists have worked on this parcel and surrounding lands for the last 10 years. They have spent countless hours performing field work, including wetland delineations, tree surveys, and listed species surveys. They are extremely familiar with what species utilize the project area. Kimley-Horn has also completed an online review of Florida Native Areas Inventory (FNAI) for species that might utilize the project area and none of these species have been observed. The applicant will be required to coordinate with the FWC during the State ERP review process. Any wildlife concerns that arise from FWC coordination will be addressed at that time.

Further issues identified were the discrepancy in size from the SWFWMD permit and the Kimley-Horn report (8.79AC vs. 6.6AC) and the justifications provided for wetland impacts, which the authors of the report note are not expected to be valid justifications per the applicable state and federal rules. **Response: The Village at Laurel and Jacaranda project is proposing 6.6 acres of impacts to Wetland G. The north portion of Wetland G outside of the current project area (acreage area not known at this time) will be impacted by the Laurel & Jacaranda Road widening project. There will be a remnant portion of Wetland G that is to remain on the western side of the Village at Laurel and Jacaranda parcel (remnant acreage not known at this time). During the roadway widening permitting, engineering and design will ensure adequate hydrology in pre and post conditions to the portion of Wetland G that will remain to the west.**

Please contact us with any comments or questions you may have.

Very truly yours,



Alec D. Hoffner
Project Manager

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