

From: [Nicole Tremblay](#)
To: [Jeffery A. Boone](#); [Jim Collins](#); [Jackson Boone](#); annette.boone@boone-law.com
Cc: [Roger Clark](#)
Subject: Villages at Laurel and Jacaranda - Environmental Summary
Date: Wednesday, October 26, 2022 11:08:00 AM
Attachments: [image001.jpg](#)

Good morning,

We received the evaluation from Wade Trim of the environmental report provided by Earth Resources Consulting Scientists regarding the Villages at Laurel and Jacaranda project on Friday, 10/21, which was sent to you that same day. Staff provides a brief summary below of issues identified in the report. However, this is not an exhaustive list of identified issues and the memorandum from Wade Trim and the report itself by Earth Resources needs to be taken into account and addressed.

There were 5 Comprehensive Plan strategies identified with which the proposed project would conflict:

- 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
- 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
- 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
- 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
- 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

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.

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If these issues remain unresolved, they will be included in the staff report and identified as concerns regarding consistency with the City's Comprehensive Plan.

Thanks,
Nicole Tremblay, AICP
Senior Planner

City of Venice
401 West Venice Ave
Venice, FL 34285
941-882-7449

