



October 19, 2018

Mr. Rodger Clark, Planning Manager
Planning and Zoning Division
City of Venice, Florida
401 West Venice Avenue
Venice, FL 34285

**RE: RUSTIC ROAD
ECOLOGICAL NARRATIVE – CITY OF VENICE REVIEW**

Dear Mr. Clark:

As requested by the applicant, Rustic Road Partners, LLC, the subject ecological narrative has been prepared by Steinbaum and Associates, Inc. for the above referenced ± 318.763 acre site pursuant to proposed rezoning and Comprehensive Plan amendment.

The property is east of I-75 and borders a segment of Rustic Road, within Sections 20 & 21, Township 38S, Range 19E (Sarasota County, Florida). Component Parcel I.D. Nos. are 0362001010, 0364040002, 0361001004, 0361001003, 0361001001, 0361001002, 0362001002, and 0362001007.

The environmentally conscientious planning approach has resulted in avoidance and preservation of 99.99 percent of existing wetland area, designation of open space corridors, and adherence to pertinent Visions, Intents, and Strategies contained in the Open Space Element of the City of Venice Comprehensive Plan (2017 – 2027).

1.0 ON-SITE VEGETATION ASSOCIATIONS

Existing on-site vegetation associations and land cover were characterized based on review of various ecological references, field observations by Steinbaum and Associates, Inc. staff, State jurisdictional field reviews on March 23, 2018 and April 16, 2018, and application of the Florida Land Use, Cover & Forms Classification System (FLUCFCS). Please refer to the attached conceptual FLUCFCS Map, dated October 19, 2018.

1.1 WETLANDS

State wetland jurisdictional limits were flagged by Steinbaum and Associates, Inc. staff pursuant to the Florida Unified Wetland Delineation Methodology (Chapter 62-340, F.A.C.), and, said limits along with other surface waters (OSW) were subsequently field verified by Southwest Florida Water Management District (SWFWMD) via a formal State wetland determination (currently under review).

The project's twelve State jurisdictional palustrine wetlands (referred to as Wetlands 1 – 12) comprise ± 16.892 acres. All wetlands are situated in pre-development agricultural lands, and the majority have been subject to cattle impacts. The hydroperiods of these wetlands range from permanent to semi-permanent.

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1.1 WETLANDS (CONTINUED)

On-site wetlands are described as follows:

619 - EXOTIC WETLAND HARDWOODS

Wetland 1

This ±0.228 acre low quality, remnant wetland is adjacent to Rustic Road. Wetland 1 is dominated by undesirable species [primrose willow (*Ludwigia peruviana*), Brazilian pepper (*Schinus terebinthifolius*), and torpedo grass (*Panicum repens*)].

641 - FRESHWATER MARSHES

Wetlands 2 – 8 and 10 - 12

The project's freshwater marshes have one to three zones. Core species include varying proportions of pickerelweed (*Pontederia cordata*), maidencane (*Panicum hemitomon*), St. Johnswort (*Hypericum spp.*), and primrose willow. Wetland 6 additionally exhibits a central grouping of Carolina willow (*Salix caroliniana*). Middle and outer zone species include varying proportions of broomsedge (*Andropogon virginicus*), St. Johnswort, torpedo grass, yellow-eyed grass (*Xyris spp.*), watergrass (*Luziola spp.*), and red ludwigia (*Ludwigia repens*).

617 - MIXED WETLAND HARDWOODS

Wetland 9

This linear wetland parallels the west side of Cow Pen Slough canal in the north section of the property. Transitional and hydric hardwoods include laurel oak (*Quercus laurifolia*), water oak (*Q. nigra*), red maple (*Acer rubrum*), Brazilian pepper, and sweetbay (*Magnolia virginiana*). Understory species include mixed ferns (e.g. *Woodwardia areolata*, *Blechnum serrulatum*), lizard's tail (*Saururus cernuus*), and some primrose willow. Wetland 9 includes an internal flow-way segment and a prominent node dominated by Carolina willow, wax myrtle (*Myrica cerifera*), young laurel oak, and mixed ferns. Uplands discussed in Section 1.3 lie between Wetland 9 and Cow Pen Slough canal.

1.2 OTHER SURFACE WATERS

Other surface waters features include lakes and ponds ("523 Lakes Larger Than 10 Acres", "524 Lakes Less Than 10 Acres").

"510 Streams and Waterways" consist of agricultural ditch segments, intermittent portions where the westerly bank of Cow Pen Slough overlaps the property boundary, and minor area where the easterly bank of Fox Creek overlaps the northwest corner.



1.0 ON-SITE VEGETATION ASSOCIATIONS (CONTINUED)

1.3 UPLANDS

“211 – Improved Pastures” and “224 Abandoned Groves” are the dominant land cover types. On-site uplands are described as follows:

100 - URBAN & BUILT-UP

This FLUCFCS code is used to describe the developed parcel with a residential structure in the southern tip (west of Cow Pen Slough).

211 - IMPROVED PASTURES

Describes expansive cultivated grass pasture areas. Widely scattered upland trees and shrubs exist within the pasture matrix.

213 - WOODLAND PASTURES

Woodland pastures include scattered upland hardwoods [e.g. slash pine (*Pinus elliottii*), live oak (*Q. virginiana*) and shrubs [e.g. wax myrtle, gallberry (*Ilex glabra*), Brazilian pepper, and salt bush (*Baccharis spp.*)]. The understory includes dominant proportions of pasture grasses and intermittent clusters of saw palmetto (*Serenoa repens*). The majority of woodland pasture portions are cattle grazed.

243 - ORNAMENTAL TREE FARM

A rectangular block of planted landscape ornamentals [mostly queen palm (*Syagrus romanzoffiana*)] is surrounded by improved pasture in the east section.

224 - ABANDONED GROVES

A fallow citrus grove occupies a sizeable section of the property west of Cow Pen Slough. Cattle utilize the south section of the prior grove.

422 - BRAZILIAN PEPPER

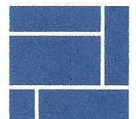
A dense stand of Brazilian pepper (an exotic) is located in the southernmost section.

438 - MIXED UPLANDS

The vegetation association in the northern section (west of Cow Pen Slough), bordering Wetland 9, exhibits oaks, slash pine, wax myrtle, saw palmetto, and some Brazilian pepper. It appears this area has not been subject to cattle grazing.

740 - DISTURBED LAND / 422 - BRAZILIAN PEPPER

This combined FLUCFCS code is used to characterize the overgrown junk yard west of Cow Pen Slough. Brazilian pepper is prevalent around the fringe, as well as interior.



2.0 LISTED SPECIES

2.1 LISTED SPECIES RESEARCH

Steinbaum and Associates, Inc. staff conducted research of various website resources for any documented wildlife species within the project vicinity that are considered endangered, threatened and/or species of special concern by the U.S. Fish and Wildlife Service (FWS) or the Florida Fish and Wildlife Conservation Commission (FWC), or afforded other specific protection through FWS and/or FWC guidelines. Such resources are as follows: Florida Natural Areas Inventory Map (FNAI), FWC Eagle Nest Locator website, and Sarasota County's list of parcels identified as being within scrub habitat requiring FWS coordination.

Note that the FNAI Biodiversity Matrix Query Results (BMQR) "Unofficial Report" was reviewed for Matrix Units 26262, 26263, 26534, and 26535. These one-square mile matrix units encompass and extend beyond the project area. The BMQR results for these Matrix Units (clarified using the FWC Eagle Nest Locator website) indicate no documented protected species. The FWC Eagle Nest Locator website indicates no bald eagles within 660' of the project boundary (660' is the maximum eagle nest protection zone based on the combined guidelines of FWS and FWC). Note that the FWC Eagle Nest Locator website data is current through the 2015-2016 nesting season for Sarasota County. Additionally, the parcels comprising the Rustic Road property are not included on Sarasota County's aforementioned list of parcels with scrub jay habitat requiring FWS coordination.

2.2 ON-SITE LISTED SPECIES SURVEY

Steinbaum and Associates, Inc. staff conducted on-site general listed species survey events in March, 2018 using standardized and recognized method. The methodology entailed systematically walking or driving linear and meandering transects, and observing both understory and tree canopies for signs of listed species. The project perimeter, ditch banks, and perimeters of wetlands and ponds were also walked.

The result of the March, 2018 on-site listed species survey is that potentially active gopher tortoise (*Gopherus polyphemus*) burrows, mostly within non-native land cover, were observed. Gopher tortoises are considered threatened by the State. Additionally, a brief sighting of a Sherman's fox squirrel (*Sciurus niger shermani*), a state species of species concern, occurred during the March 23, 2018 SWFWMD site visit.

Refer herein to discussion of subsequent predevelopment surveys (and permitting if necessary) that will be performed pursuant to the above species, as well as the benefits the Rustic Road project will provide with respect to both attracting and protecting listed and other wildlife species.



3.0 CONSISTENCY WITH COMPREHENSIVE PLAN

The proposed site plan demonstrates the efforts used to “design around” native habitat, and comply with pertinent Visions, Intents, and Strategies of the Open Space Element of the City of Venice Comprehensive Plan.

Nearly all wetlands have been avoided and incorporated into conglomerate and linear open space areas. Other open space components include representative upland habitats (incorporated into wetland buffers), and created open water resources. Included are open space areas that have been designated along bordering flow-ways (Cow Pen Slough and Fox Creek) to protect and enhance the corridor values of such features.

Each "Intent" is presented below with comments relative to the "Strategies" identified to support the “Intent” and how the Rustic Road property project will adhere.

SECTION III - ELEMENTS - OPEN SPACE

Vision OS 1 - The City of Venice shall effectively preserve, protect, maintain, manage and use open space.

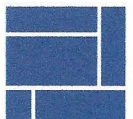
CONSERVATION OPEN SPACES

Intent OS 1.2 - Conservation Open Spaces

The City shall use its Conservation Open Space to provide conserved open space for its residents and visitors.

Strategy OS 1.2.1 - Conservation Open Space – Defined: The Rustic Road project includes six of the example types of Open Space listed under this Strategy.

Strategy OS 1.2.2 - Environmental Impact Mitigation: Nearly all state jurisdictional wetlands have been avoided. The only wetland necessitating impacts is very low quality, remnant (0.228 acre) Wetland 1, which is dominated by exotic/invasive species. The amount of any required mitigation will be based on the most current state approved methodology (e.g. the Uniform Mitigation Assessment Method), however, the State will likely not require mitigation for impacts to this wetland (per Section 10.2.2.1, A.H.1). All preserved wetlands will be protected via upland buffers or other measures to provide reasonable assurance that secondary impacts will not occur. The Rustic Road project is anticipated to create habitat that would be available for wildlife (including listed species). However, the appropriate listed species permitting (e.g. for gopher tortoise relocation) would be pursued where necessary.



WETLANDS

Intent OS 1.3 – Wetlands

The City shall implement strategies to protect its wetlands, wetland buffers, and aquifer recharge areas.

Strategy OS 1.3.1 - Wetland and Aquifer Recharge Areas Protection: The proposed development protects aquifer recharge areas through avoiding 99.9% of on-site wetlands, implementing erosion control measures to protect water resources during construction, and by providing buffers between wetlands and proposed development.

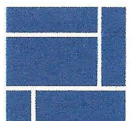
Strategy OS 1.3.2 - Wetland Encroachments: The only impact is proposed to the poorest quality on-site wetland (Wetland 1). Since remnant Wetland 1 is isolated and less than 0.5 acre, the State will likely not require mitigation for impacts (per Section 10.2.2.1, A.H.1). The applicant is providing post-development ecological enhancements that far outweigh the Wetland 1 impact, such as preservation of all other wetlands, removal of cattle (and associated wetland impacts) from development sections, and designation of the open space area associated with Wetland 9. Wetland 9 has significance in being the only linear wetland, and the uplands bordering Wetland 9 include the only “438 - Mixed Hardwoods” FLUCFCS code within the project.

NATIVE HABITATS, CONSERVATION LANDS, AND NATURAL RESOURCES

Intent OS 1.4 - Native Habitats, Conservation Lands, and Natural Resources

The City recognizes the importance of its native lands and habitats and shall implement preservation strategies that protect native habitats, conserve environmental lands and natural resources, minimize environmental pollution, and increase public awareness of the harmful effects of non-native species.

Strategy OS 1.4.2 - Protection of Native Habitats and Natural Resources: The project planning emphasizes avoidance of wetlands, and hence nearly 100 percent of the project’s wetlands have been designed around. Erosion and sediment control measures will be implemented during construction to protect water quality. Cattle (and associated water quality and substrate impacts) will be removed within active development phases which will result an ecological net gain in wetland quality. Though pre-development uplands consist primarily of non-native landcover, native vegetative species occur within woodland pastures and mixed hardwoods FLUCFCS codes. Portions of woodland pastures will be retained within wetland buffers. Regarding mixed hardwoods, Wetland 9 and encompassing uplands (inclusive of mixed hardwoods) will add a diverse linear open space mosaic, and will provide habitat contiguity and wildlife corridor values. Additionally, linear stormwater management lakes are proposed within historically denuded land cover (improved pasture). These open water features will allow for maintenance (or improvement) of wetland hydrologic regimes and will contribute to minimizing barriers to wildlife movement.



Intent OS 1.4 - Native Habitats, Conservation Lands, and Natural Resources (Continued)

Strategy OS 1.4.3 - Endangered or Threatened Species: Assure protection of all listed species by conducting additional updated listed species surveys prior to site construction activities and adhering to all protective measures associated with any identified listed species.

Regarding gopher tortoises, a gopher tortoise survey will be conducted within 90 days of the commencement of construction activities. If potentially occupied gopher tortoise burrows are identified within proposed development areas, the clients Authorized Gopher Tortoise Agent will obtain a Florida Fish and Wildlife Conservation Commission (FWC) gopher tortoise relocation permit. Any captured gopher tortoises will then be relocated to an approved off-site long term protected recipient area prior to commencement of construction activities.

Regarding fox squirrels, no nests were observed at time of our listed species survey. An updated survey would be conducted within 60 days of site clearing. The appropriate permit would be obtained from FWC should any nests of this species be identified (e.g. as needing removal) within proposed development areas. Note that designated open space areas within the Rustic Road project will include habitat available for use by the Sherman's fox squirrel.

Strategy OS 1.4.4 - Non-Native Invasive Species: Exotic plant species will be removed where feasible within wetland preserves.

Strategy OS 1.4.5 - Floodplain and Flood prone areas: The need for floodplain compensation will be addressed through updating the watershed model to assure that predevelopment stages do not increase with the addition of the proposed development. The Rustic Road project will be designed to show showing no raise in the stages, and hence that any and all necessary floodplain mitigation has been provided.

UNIQUE HABITATS

Intent OS 1.5 - Unique Habitats

The City recognizes the importance of its unique habitats and shall implement preservation strategies that protect and conserve their environments consistent with applicable laws and regulations

The subject property has no marine, beach, or dune habitats pursuant to Strategies 1.5.1 – 1.5.4

Strategy OS 1.5.5 - Florida Scrub-Jay, Gopher Tortoise, and Other Sensitive Habitats:

Parcels comprising Rustic Road are not included on Sarasota County's list of parcels identified as being within scrub habitat requiring FWS coordination.

Potentially active gopher tortoise burrows within areas of proposed development will be addressed pursuant to current FWC Gopher Tortoise Guidelines. The appropriate gopher tortoise relocation permit would be obtained, and captured tortoises would be transported to an off-site FWC approved long term protected gopher tortoise release area.

OPEN SPACE CORRIDORS

Intent OS 1.6 - Open Space Corridors

The City will establish open space corridors to facilitate the movement of people and wildlife.

Strategy OS 1.6.2 - Open Space Corridor System: The project's wetlands and created stormwater management lakes are anticipated to attract wetland dependent species. This in combination with upland open space components will allow refuges for species to reside in and move through the project's green and blue space. Though on-site wetlands are estimated to be hydrologically disconnected from Cow Pen Slough, the project proposes a series of hydric and upland open space components along this canal. Such components are three of the preserved wetlands and associated upland buffers (inclusive of linear Wetland 9 encompassed by mixed upland hardwoods in the north section), a relatively sizeable lake to be created in pre-development non-native land cover in the south section, and other open space. The corridor values associated with the project's designation of natural and created open space components along Cow Pen Slough are increased in significance when considering that this hydric artery extends beyond the subject property.

CONSERVATION DESIGN AND DEVELOPMENT CONSIDERATIONS

Intent OS 1.10 - Conservation Design and Development Considerations

The City will implement design and development strategies in the City's Land Development Code and review processes that reduce the negative effects of development on water, energy, natural resources, global, and climate impact.

Strategy OS 1.10.1 - Land Development Code Considerations: Rustic Road applies conservative

Green Building Strategies

The project supports various Green Building Strategies via site planning that considers protection of wetlands a paramount objective, by utilizing an innovative stormwater management system design that will be subject to permitting through SWFWMD, by conserving water through installing species-specific plantings in appropriate locations, by incorporating well planned open space (contributing to minimization of impervious surface), and by protecting water resources through the coordination with all utilities.

Tree resources

Tree protection will be implemented consistent with the County Tree Protection Code

Landscaping

Proposed landscaping will include Florida-friendly trees, shrubs, and groundcover material, and will retain individual and clusters of trees within open space areas wherever feasible.



Strategy OS 1.10.1 - Land Development Code Considerations (Continued):

Water and groundwater resource protection and conservation

Rustic Road project will be subject to Environmental Resource Permitting, where the stormwater management design will be required to meet state water quality and quantity standards. Measures to protect wetland buffers and prevent erosion and siltation (e.g. silt screens) shall be implemented prior to any construction activities taking place. Post-construction assurances for protection of water quality will be provided through maintenance of stormwater management facilities. The project will adhere to City of Venice watering restrictions. Water resources will additionally be protected through the coordination with all utilities.

Natural drainage channel protection

The project's stormwater management design through SWFWMD permitting assures that flood potential for off-site areas is not increased and that water quality is maintained through on-site stormwater management facilities.

Runoff filtration and treatment

The project's stormwater lakes will treat stormwater through the appropriate methods to help remove pollutants before run-off drains into water resources (such as wetlands). Routine maintenance of stormwater lakes (and associated control structures) will be performed, as required by SWFWMD, to keep the system functioning properly. With appropriate pre-treatment, preserved wetlands can serve as natural buffers to pollution and soil erosion.

Impervious surfaces

Impervious surface areas are minimized by ensuring that open space (inclusive of preserved wetlands and associated upland buffers) are set-aside.

INTERGOVERNMENTAL COORDINATION

Intent OS 1.12 - Interagency Coordination

The City shall utilize intergovernmental partnerships to expand the City's ability to protect, enhance, and maintain its open spaces and natural resources including coastal areas and those areas included in this Element. This coordination extends to the siting, land acquisition, co-location, programming design, and construction opportunities of functional and conservation open spaces.

Strategy OS 1.12.7 - Myakka River Coordination:

The Rustic Road property is not located within 220 feet of the Myakka River.



It is manner, it clear that the Rustic Road project adheres to pertinent Visions, Intent, and Strategies contained in the Open Space Element of the City of Venice Comprehensive Plan (2017 – 2027).

Please contact me if you have any questions or need to discuss.

Sincerely,

A handwritten signature in dark ink, appearing to read 'M. Steinbaum', followed by a long horizontal line.

Michele L. Steinbaum, President
Steinbaum and Associates, Inc.

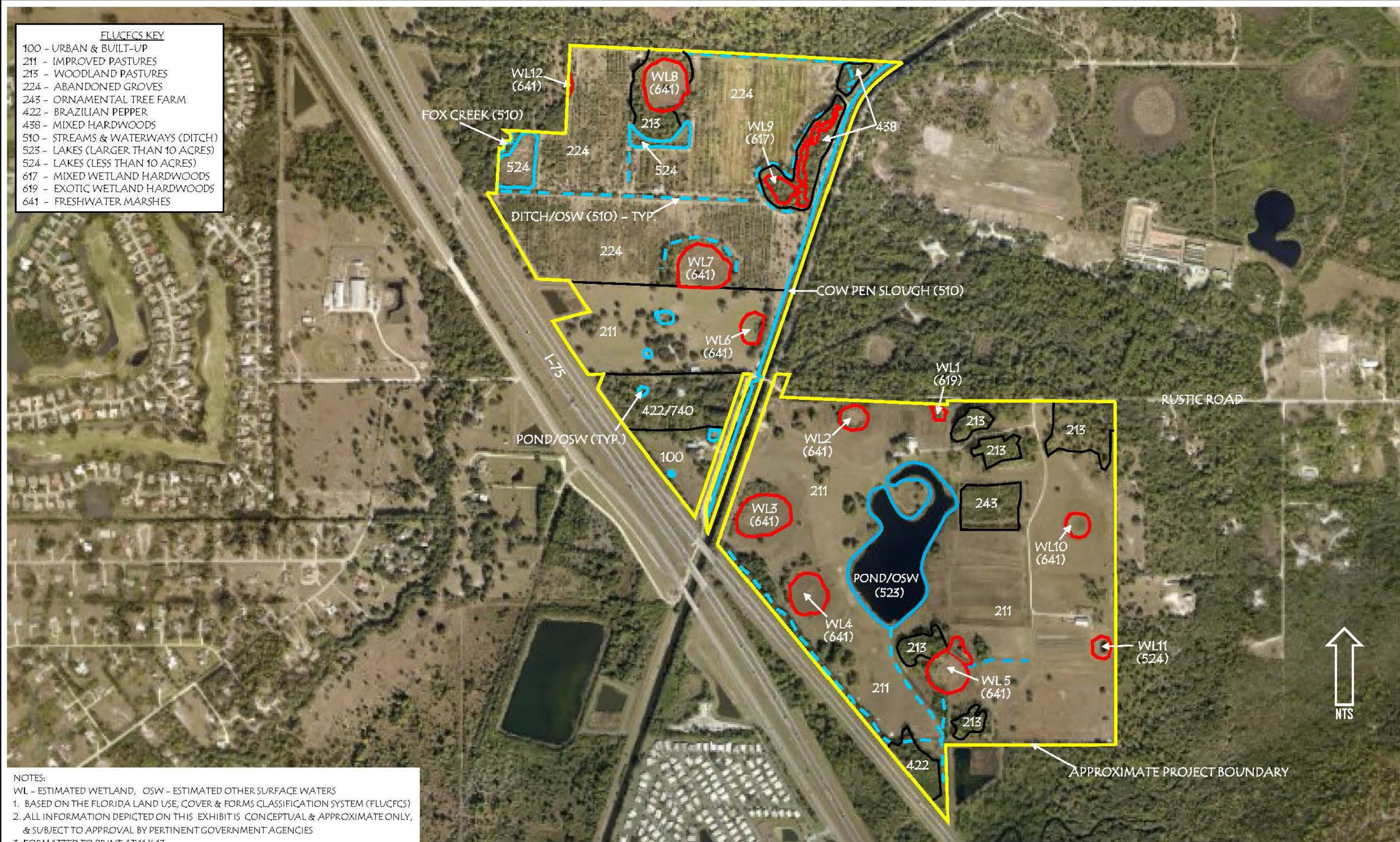
Enclosure

cc: Stephen Rentz (Rustic Road Partners, LLC)
Jeffrey A. Boone, Esq. (Boone Law Firm)
Jim Collins (Boone Law Firm)
Ronald Waldrop, P.E. (Waldrop Engineering)



FLUCFCS KEY

100 - URBAN & BUILT-UP
 211 - IMPROVED PASTURES
 213 - WOODLAND PASTURES
 224 - ABANDONED GROVES
 243 - ORNAMENTAL TREE FARM
 422 - BRAZILIAN PEPPER
 438 - MIXED HARDWOODS
 510 - STREAMS & WATERWAYS (DITCH)
 523 - LAKES (LARGER THAN 10 ACRES)
 524 - LAKES (LESS THAN 10 ACRES)
 617 - MIXED WETLAND HARDWOODS
 619 - EXOTIC WETLAND HARDWOODS
 641 - FRESHWATER MARSHES



NOTES:

- WL - ESTIMATED WETLAND, OSW - ESTIMATED OTHER SURFACE WATERS
- 1. BASED ON THE FLORIDA LAND USE, COVER & FORMS CLASSIFICATION SYSTEM (FLUCFCS)
- 2. ALL INFORMATION DEPICTED ON THIS EXHIBIT IS CONCEPTUAL & APPROXIMATE ONLY, & SUBJECT TO APPROVAL BY PERTINENT GOVERNMENT AGENCIES
- 3. FORMATTED TO PRINT AT 11 X 17

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RUSTIC ROAD
 CONCEPTUAL HABITAT/LAND COVER (FLUCFCS) MAP

OCTOBER 19, 2018