

January 15, 2019

Roger Clark
Planning Manager
Planning and Zoning Division
City of Venice
401 West Venice Avenue
Venice, FL 34285

RE: Rustic Road Ecological Narrative
Environmental Review
Jones Edmunds Project No.: 22120-004-01

Dear Mr. Clark:

In accordance with the Scope of Work included in *Work Assignment 2017-01 pursuant to the November 30, 2016 agreement between the City of Venice, Florida and Jones Edmunds & Associates, Inc.*, Jones Edmunds is to provide a review of environmental reports by a qualified professional for consistency and to determine if they comply with Intent Open Space 1.1 – 1.9 City of Venice's current comprehensive plan (2017-2027 Comprehensive Plan).

The City of Venice Planning and Zoning Division recently received an Ecological Narrative report for the proposed Rustic Road development dated October 19, 2018. The Narrative details the environmental assessment of a ±318.8-acre site along Rustic Road, Sections 20 and 21 Township 38 South Range 19 East in Sarasota County, Florida.

Jones Edmunds reviewed the Narrative to determine if the planned development is in compliance with the City's Comprehensive Plan. The following presents our findings.

METHODOLOGY

The City provided Jones Edmunds with the Narrative for review on December 31, 2018. In addition to the Ecological Narrative, the City provided the *Rustic Road Planned Unit Development (PUD) Binding Master Plan*, dated October 15, 2018, and *Amendment No. 3 to the Amended and Restated Joint Planning and Interlocal Service Boundary Agreement Between the City of Venice and Sarasota County* (undated) to assist in our review. Additional resources used in the review process include but are not limited to publicly available Geographic Information Systems (GIS) data, including Sarasota County GIS (<https://sarco.maps.arcgis.com/home/index.html>), Southwest Florida Water Management District (SWFWMD) land cover, National Wetlands Inventory (NWI) wetlands,

National Resource Conservation Service (NRCS) Web Soil Survey, Florida Fish and Wildlife Conservation Commission (FWC) Eagle Nest Locator (<https://public.myfwc.com/FWRI/EagleNests/nestlocator.aspx>), and historical aerial imagery (various sources).

No field verification of wetland lines or on-site assessments were performed as part of this review.

RESULTS AND DISCUSSION

The Narrative provided the proposed development's adherence to the Open Space Element of the City of Venice 2017-2027 Comprehensive Plan (Section III), including impacts to delineated on-site wetlands and other native habitats, potential impacts to endangered and threatened species, and proposed open space. The following presents our determinations regarding the proposed development's consistency and accordance with the Open Space Elements of the City's Comprehensive Plan.

INTENT OS 1.1 – FUNCTIONAL OPEN SPACES

No Functional Open Spaces are proposed. As such, Intent OS 1.1 is not applicable.

INTENT OS 1.2 – CONSERVATION OPEN SPACES

Applicant is proposing open space consisting of wetlands, wetland buffers, protection of the native habitat (Mixed Uplands) along Cowpen Slough and along the perimeter of the development. The Applicant proposes impacts to surface waters and to 0.23-acre of state jurisdictional wetlands. All wetland and surface water impacts shall be reviewed, permitted, and mitigated in accordance with the Southwest Florida Water Management and U.S. Army Corps of Engineers regulations.

All listed wildlife species must be surveyed in accordance with state and federal regulations and mitigation shall be provided if necessary.

Jones Edmunds is of the opinion that the proposed development is in accordance with Intent OS 1.2 of the Comprehensive Plan.

INTENT OS 1.3 – WETLANDS

OS 1.3 of the Comprehensive Plan discusses protection of wetlands and aquifer recharge areas, federal and state permitting, upland buffers, and other means of protection. The planned development avoids nearly 100% of the on-site state jurisdictional wetlands, only impacting 0.23 acre, and 30-foot upland buffers will be provided between wetlands and proposed development.

Assuming the applicant obtains the necessary federal and state wetland permits and completes the necessary mitigation for wetland impacts, Jones Edmunds is of the opinion

that the proposed development is in accordance with Intent OS 1.3 of the Comprehensive Plan.

INTENT OS 1.4 – NATIVE HABITATS, CONSERVATION LANDS, AND NATURAL RESOURCES

STRATEGY OS 1.4.2 PROTECTION OF NATIVE HABITATS AND NATURAL RESOURCES

OS 1.4 of the Comprehensive Plan discusses protection and conservation of native lands and habitats. Based on the Narrative submitted, nearly 100 percent of the project's wetlands will be preserved and pre-development uplands consists primarily of non-native landcover. The only native habitat (Mixed Hardwoods adjacent to Wetland 9) will be conserved as open space and native vegetation will be preserved within wetland buffers. As such, the Applicant's proposed development is in accordance with Strategy OS 1.4.2.

STRATEGY OS 1.4.3 ENDANGERED AND THREATENED SPECIES

Endangered or threatened species were observed during the environmental assessment. The Narrative mentions observing Gopher Tortoise burrows and a fox squirrel sighting, but no locations or burrow counts were provided. Applicant proposes to remove on-site gopher tortoises and address potential fox squirrel nests in accordance with FWC regulations. As such, the Applicant's proposed development is in accordance with Strategy OS 1.4.3.

STRATEGY OS 1.4.4 NON-NATIVE INVASIVE SPECIES

Applicant proposes to remove non-native invasive species within wetland open space that remain. As such, the Applicant's proposed development is in accordance with Strategy OS 1.4.4.

STRATEGY OS 1.4.5 FLOODPLAIN AND FLOOD PRONE AREAS

The development contains Flood Zone A areas in the north portion of site in association with an existing wetland. Much of this flood zone appears to be future open space or the location of a stormwater management system. Applicant proposes to perform modeling to confirm the development results in no increase in stage and floodplain losses will be compensated. If these conditions are met and the applicant permits site development in accordance with SWFWMD regulations, the Applicant's proposed development will be in accordance with Strategy OS 1.4.5.

INTENT OS 1.5 – UNIQUE HABITATS

The property has no marine, beach, or dune habitats pursuant to Comprehensive Plan Strategies 1.5.1 through 1.5-4. Additionally, the only native habitat on-site and additional uplands will be preserved as open space. Gopher tortoises have been documented on site and appropriate relocation permits will be obtained and tortoises will be relocated in accordance with FWC regulations.

As such, the Applicant's proposed development is in accordance with Strategy OS 1.5.5.

INTENT OS 1.6 – OPEN SPACE CORRIDORS

OS 1.6 of the Comprehensive Plan discusses the establishment of open space within developed areas to function as wildlife corridors. The Narrative and preliminary site plan propose open space surrounding all wetlands, provide corridors meeting the Comprehensive Plan's 25-foot minimum width along the site boundary and throughout the proposed development, and open space is proposed for the only area of native habitat. Furthermore, a minimum 20-foot natural or planted open space buffer is proposed adjacent to Cow Pen Slough.

Jones Edmunds is of the opinion that the proposed development is in accordance with Intent OS 1.6 of the Comprehensive Plan.

INTENT OS 1.7 – MINING CONSIDERATIONS

No mining activities are proposed. As such, Intent OS 1.7 is not applicable.

INTENT OS 1.8 – COASTAL WATERWAY CONSERVATION AND PROTECTION

Coastal waterways are not found within the proposed development. As such, Intent OS 1.8 is not applicable.

INTENT OS 1.9 – COASTAL HIGH HAZARD AREA (CHHA) DEVELOPMENT

Coastal High Hazard Areas do not occur within the proposed development. As such, Intent OS 1.9 is not applicable.

If you have any questions or need any additional information, please contact me at (352) 377-5821, extension 1390, or bbukata@jonesedmunds.com.

Sincerely,



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