

## Dover Kohl recommendation comments

### **Some items to consider for inclusion in the Brown recommendations:**

1. Do not permit any new fill dirt mines in the DRGR.
2. Withhold action contingent upon pending modeling: Final action should not be taken before the committee has a chance to review and comment on the pending hydrologic modeling and ecological mapping efforts. The hydrologic model may provide essential information regarding the impacts of mines in different regions of each scenario, and may alter the positions of the committee. It would be premature to entertain as binding, any recommendations given prior to a model review.
3. Coordinate with Lehigh Acres planning effort to seek greater regional benefits.
4. Identify regions of the DRGR where mining is absolutely not compatible (on or near the steep 5' drop between 25' and 20' NGVD just above Corkscrew Swamp Sanctuary).
5. Retrofit existing permits to:
  - avoid anticipated harmful impacts to Airport Mitigation Bank
  - remediate past wetland impacts, allow excavation in "lost" wetland preserve areas, while mitigation credits are purchased for realized lost functions not accounted for in original permitting.
6. Future mining in the DRGR should adhere to BMP's for mining that include:
  - measures to avoid "chain of lakes" drawdown attributes.
  - partition lakes with sufficient buffers in areas w/ hydrologically significant relief
  - align pits parallel to topo lines
  - plan for post dig reclamation to include measures from Jim Beever's presentation
  - Establish set-backs based on topographic relief and functions provided by adjacent land areas.
7. Brown line #189 should be divided into 2 items. The need for a study that establishes the demand for aggregate into the future is a critical need which will inform the timeline of mining zones identified by this committee.

Additionally – I believe it would be helpful to clarify (line 173) and the issue of primary and secondary mining zones. It is my understanding (objective 10.1 of Lee Plan, & page 3.17 in the Dover Kohl report) that this process should identify sufficient land to supply aggregate to Lee County (and surrounding area?) through 2030. Anything beyond that spelled out demand should be clearly identified in some appropriate category. Dover Kohl indicates 821 acres of land are needed in addition to the current permitted area. All scenarios provide much more than this target, therefore all scenarios will serve the Lee and the regions needs beyond 2030. According to Don's analysis no additional acreage is needed prior to 2030.

I suggest we identify no more than 850 acres to make up a primary mining zone, this area would be given first consideration for rezoning to meet aggregate demands. A

## Dover Kohl recommendation comments

secondary zone would be further defined in the scenarios as land to consider as available for mining to meet needs beyond 2030. The demand study requested in #7 above would help define the time frame served by the secondary zone.

Additional resource protection areas (line 170) would provide assurance for land owners and the county that valuable aggregate would remain available for extraction beyond the planning horizon if future demand merits it. These areas should receive some special consideration in any TDR programs, rezoning, and future permitting in-order to ensure that uses incompatible with mining are not permitted (sprawled residential).

Did all parties agree that Lehigh style sprawl was incompatible in the DRGR? If so, this should be clearly stated. Along with the points that mention transferring density and clustering (line 183).