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December 1, 2023

Martin County Commissioners
2401 SE Monterey Road
Stuart, Florida 34996

via email

Re: CPA 22-06 and 23-12

Dear Martin County Commissioners:

The Guardians of Martin County have several questions and concerns regarding the Comp Plan amendments that are being considered for the Calusa Ranch project. While we appreciate that the project proposes to allocate 70% of the 3,900+ acre property as open space, we are concerned that the perceived rush to get the project approved is not providing adequate opportunity for interested parties, including the Guardians, to fully understand the project and its potential impacts. This is particularly notable in that documents associated with the proposal were not available to the public until just before the meeting of the Local Planning Agency on November 16, 2023.

Similar to the concerns we voiced during the consideration of the Rural Lifestyle Zoning proposal, we have concerns regarding the impacts of the Calusa Ranch project on: 1) Water and the Environment; 2) Infrastructure and Public Services; 3) the Community, and; 4) Conservation and Open Space, each of which are identified and described hereafter.

1) Water and Environmental Impact:

a) Without a requirement for water quality monitoring, how can the public be assured that converting low-impact cattle rangeland to a development with homes, golf courses, golf course cottages, worker dormitories and support facilities will not further degrade the quality of our surface waters?

b) How will the enhanced nutrient-reducing septic systems be implemented, and what guarantees are there for monitoring their effectiveness?

c) What measures are in place to mitigate potential environmental consequences of the development, especially given the lack of municipal water and wastewater services?

d) Regardless of how stormwater and leachate from on-site water treatment systems are managed, we are concerned about the likelihood that pharmaceuticals, forever chemicals (PFAS and PFOS), and chemicals related to the application of herbicides, pesticides and fertilizers will make their way off-site and/or the surficial aquifer.

2) Infrastructure and Public Services:

a) We are concerned that, without having details for the multi-slip docking facility, it is impossible to determine the extent to which the project is consistent (or not) with the County's Manatee Protection Plan, and its associated Boat Facility Siting Plan, and how that element of the project aligns with other environmental conservation efforts.

b) Will the County be providing potable water and/or wastewater services to the project?

3) Community Impact:

a) It is unclear to us how the County could make the determination that conversion of rangeland to the golf course project and its associated residences, cottages, worker dormitories and commercial uses will not result in an increase in traffic on Kanner Highway and other public services (e.g., emergency response) considering the extension of development beyond the Urban Service District. What assessments have been made regarding the potential increase in traffic on Kanner Highway and its impact on the community?

b) We understand from Staff Reports that the County has made the determination that the project does not contribute to the proliferation of urban sprawl. We hold that if the conversion of low-intensity ranch land to the proposed uses does not constitute urban sprawl, then the criteria need to be amended to be realistic.

c) Are there plans to address the potential strain on local resources and services due to the introduction of new residential and commercial elements outside the Urban Service District?

4) Conservation and Open Lands:

a) We believe that the requirement for a conservation easement or agricultural easement (with a third party easement holder) was a valuable addition to the Rural Lifestyle Regulations. As described in the Guardians Position Paper on Golf Courses proposed outside the Urban Service Districts (which was transmitted as an attachment to our comments for the LPA meeting at which the Calusa Ranch project was considered), we urge the County to require a conservation easement or agricultural easement that will apply to the undeveloped portions of the Calusa Ranch property that will not be protected by a PAMP.

b) We are interested in understanding how the proposed development aligns with other components of the existing Rural Lifestyle Regulations and the character of the surrounding area, particularly when it abuts Pal-Mar's "Chimney" to the west.

c) We understand that wetlands and a portion of native upland habitat will be protected pursuant to a Preserve Area Management Plan, but we would like to understand how the development potentially effects open-space lands that would otherwise not be protected, and what efforts are being made to ensure conservation.

d) The Guardians supported the proposal to allocate a percentage of new tax revenues that will be generated by Rural Lifestyle projects for the purposes of acquiring environmentally sensitive or strategically valuable properties. Please consider adding that provision to the Calusa Ranch project as a means of mitigating the conversion of rangelands to housing, golf courses and other lands uses of comparably lower-value open space.

Lastly, while we did not support the creation of the Rural Lifestyle Zoning category, the Commission majority's vote in favor of it in October 2022 was somewhat mitigated by the provision that a study be conducted to evaluate the impact on western lands and the requirement that to be eligible for approval under the new category, any new developments would have to abut one of the county's urban service districts. Doing so constrained the spread of development and limited the scope and potential impact of this land-use change on the county's environment and public services. Amending the Comp Plan now to allow a Rural Lifestyle development more than a mile outside a USD would unfortunately validate the warnings of opponents that previous limitations would not hold, and further erode the public's waning confidence in the transparency and actions of our elected officials.

We ask that the Commission please either deny the requested amendments to the Comprehensive Plan, or continue the transmittal hearing to a later date to give the applicant and the community the opportunity to discuss refinements that would address concerns about water quality, economic issues, wildlife corridors and land conservation.

Thank you for your consideration.

Sincerely,



Peter H. Conze, Jr.
President



D. Greg Braun, Executive
Executive Director

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