

Michelle Hollidge public comment filed August 26, 2026

Redaction and source note

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- Direct resident email and residential street address are obscured on original pages 1 and 42.
- Shipping-label barcodes, tracking/account/routing identifiers, direct phone number, and unrelated shipper address are obscured on original pages 40–41.
- The Target 6 Plus product images and the resident filing's substantive arguments remain visible. Their inclusion is not proof that the product was applied at Tarpon Woods or that an official investigation remains open.

Lee Hughes

From: Michelle Hollidge DIRECT EMAIL REDACTED
Sent: Wednesday, August 26, 2026 4:06 PM
To: Lee Hughes; Todd Boyle; Cliff Ondercin
Cc: klevy@pinellas.gov
Subject: RAI Response Is Incomplete RE: Brooker Creek Mitigation Bank, ERP Permit: 47575.002 (App: 930235)
Attachments: SWFWMD082626.pdf

[EXTERNAL SENDER] Use caution before opening.

Gentlemen,

The "complete RAI response" promised by parties for applicants is still very much incomplete.

The issue of land ownership is treated as a minor issue, but as we understand it, ownership is a requirement for being granted this permit, and **proof of ownership has still not been submitted**. This issue alone should make this RAI response incomplete as the transfer of ownership has still not taken place and applicants still have not demonstrated sufficient property interest. Applicants have been saying the transfer of ownership is "in the process" of being recorded for years. The Pinellas County Property Appraiser's Office has confirmed just a little over a week ago that applicants have still not initiated the transfer by filing paperwork with their office, and we don't want to ask them again so soon as we can see on the Property Appraiser's website no changes have taken place as it presently shows no deed / no change in ownership as well.

Additionally, **one of the requirements for this RAI Response was to respond to the concerns raised on behalf of Pinellas County** by Kelli Hammer Levy. Again, none of these concerns were even addressed in what is supposed to be a complete RAI response. One issue that has downstream effects to everything submitted for this permit is adjusting for the **mandatory 50 ft boundary between residential property lines and the start of the bank**, which per Pinellas County Code will be a mowed and maintained swath of land that provides a buffer between our homes and applicants proposed banking activities. This 50 ft boundary completely reshapes the bank, their acreage calculations, the number of available credits, the cost of construction, etc.

The Title Commitment presented is one that appears was taken out primarily in the name of Jan Stephenson's Crossroads, a 501c3 that does not appear listed as an applicant, with Tarpon Woods Properties, LLC listed as an additional party. We are not lawyers, but to us that seems problematic.

Our full response to the newly filed RAI response is attached. While some subjects have been raised before, most- if not all- contain updated information.

Best,

The Hollidges on behalf of Tarpon Woods, Ridgemoor, and the greater East Lake Community

HOME ADDRESS REDACTED

Proud Tarpon Woods Residents since 2015

Gentlemen,

Thank you once again for taking the time to review our ongoing concerns about this unprecedented proposed mitigation bank project. We apologize for the recent increase in email, but our neighbors and neighborhoods are growing frustrated with the applicants' incomplete RAI responses and deadline extension requests which often times come after the deadline has expired.

Please note, while most of these points have been raised in the past, they remain un-resolved by applicants / parties for applicants, and we have added new updated information based off this latest response.

We feel the following issues are in conflict with the creation of the Brooker Creek Mitigation Bank and are why this and all future applications for its creation should be denied-

1. Issues Raised by Pinellas County and Requested to be Included in the RAI Response by Lee Hughes / SWFWMD Still Remain Completely Ignored & Unaddressed- Among These Issues Are the Boundaries of the Mitigation Bank Being Outside of Code / Too Close to Homes and Thus Are Not Minor

Kelli Hammer Levy on behalf of Pinellas County wrote in citing multiple county concerns regarding the BCMB application. SWFWMD forwarded the letter to Lisa Cartwright of Greensource Environmental including the need to address the county's concerns as a requirement of submitting a complete RAI response in January. As of the date we are submitting this document, and having reviewed their RAI response filed Wednesday (8/26/2026), the concerns the county raised have all been left unmentioned and unaddressed. Our county's unanswered concerns include many of our own concerns as residents as well.

Chiefly, it was pointed out that per Pinellas County Code, **all the boundaries of this project would need to be set back 50 ft from residential property lines**. Applicants were made aware of this issue mere days after refileing this mitigation bank permit request and still have not bothered to adjust their plans accordingly, did not note any changes would be forthcoming, and have not requested an extension for the purpose of addressing Pinellas County's issues indicating that they feel that the RAI response they have submitted is complete. They continue to submit maps such as the one where they would place signage and fencing that aren't just not in line with code, but we believe aren't even accurate because, as we have pointed out before, **some of these lines cut through existing homes.**

We realize that having to redraw the boundaries of the proposed Brooker Creek Mitigation Bank to comply with current county code, which states there must be a 50 ft buffer zone between the bank and residential property lines to be mowed and maintained regularly in compliance with Pinellas County Code Enforcement, setting mitigation bank boundaries back 50 feet from most, if not all, current borders is a chore, but it is one that applicants and parties for applicants have been aware of since January 2026, and something we raise every time they submit an RAI response as they continually fail to address it.

As a reminder, Tarpon Woods Properties LLC was brought before the Magistrate in August of last year by Pinellas County Code Enforcement for years of excessive non-compliance with county code and seemingly ignoring citations. The proposed site of this project, the property at 1100 Tarpon Woods Blvd,

still remains outside of compliance to date, and the building plans to correct the issues caused by the unpermitted partial demolition of the clubhouse building are, like many things, incomplete and overdue.

As applicants failed to answer the issues raised by Pinellas County in their RAI response as directed by SWFWMD, as applicants are aware the plans they have submitted do not comply with Pinellas County Code, and as no new plans or extension requests have been submitted since receiving notice of the compliance issues the current BCMB design has per Pinellas County, on these grounds we ask that SWFWMD deny the application

2. Toxic Soil- Open Investigation RE: Alleged Use of Banned Arsenic Based Herbicide Target 6 Plus by Florida Department of Agriculture (File No: 126-139-3128 TT) and the Highly Likelihood Soil Contains Arsenic and Other Heavy Metals and / or Toxins

An employee of Tarpon Woods Golf Course contacted us regarding concerns the course had purchased cases of Target 6 Plus, an arsenic based herbicide, and had been recently applying it to the golf course. We are residents and regular citizens and are not in a position to confirm or deny those claims, but the Department of Agriculture did take soil samples and is still in the process of conducting their investigation, as this herbicide is completely banned in our area of the state, is completely banned for golf course use in the state of Florida, and is only approved for use on select inland cotton fields.

We hope that SWFWMD will withhold any approval of this permit until that investigation is complete, as recent application of arsenic, a substance incompatible with animal life, applied “wall to wall”, as claimed, to the existing grounds we imagine would be a factor in approving the permit as any type of habitat creation or restoration.

The high potential for arsenic in the soil was originally raised by Universal Solutions to course ownership in 2017, and we know this from documents by Universal Solutions that were submitted in applicants application **ERP Permit: 47575.001 (App: 907654)**. This concern was also brought up in past permit applications by both concerned neighbors and by SWFWMD.

3.3 Title Records and Prior Assessment Reports

The User did not contract UNIVERSAL to acquire a chain-of-title for the subject property, nor was one provided to UNIVERSAL for this assessment.

UNIVERSAL conducted a Phase I ESA Report in July 2017 for First National of Palm Beach Gardens, Florida. The 2017 Report was completed in accordance with ASTM Practice E1527-13 and included Site Parcels 1 and 2. However, the 2017 Report did not exclude the southern portion of Site Parcel 1, the current offsite property containing the clubhouse/maintenance area. The 2017 ESA details the site and vicinity relatively consistent with the present day and included multiple interviews with onsite staff and regulators. The site was planned for continued use as a golf course in 2017. The Report identifies no RECs, although it does indicate the fuel tanks (onsite in 2017/currently offsite) and the extended use of the property as a golf course (i.e. use of fertilizers and related materials) as noteworthy.



EXECUTIVE SUMMARY

UNIVERSAL Solutions, Inc. (UNIVERSAL) was retained by Tarpon Woods Properties, LLC., to conduct a Phase I Environmental Site Assessment (ESA) at the Tarpon Woods Golf Course/Brooker Creek Mitigation Bank site (*the site/subject property*), two (2) parcels of land located at 1100 Tarpon Woods Boulevard, in Palm Harbor, Pinellas County, Florida (**Figures 1 through 4, Appendix A**). This Report documents the methods and findings of a Phase I ESA performed in conformance with the scope and limitations of the ASTM Practice E1527-21 and the Environmental Protection Agency Standards and Practices for All Appropriate Inquiries (40 CFR Part 312). UNIVERSAL certifies that all necessary and appropriate inquiry was made regarding the site, consistent with good commercial and prudent engineering practices and procedures, and that the Report contains UNIVERSAL's professional conclusions regarding the environmental condition of the site and its conclusions regarding the need for further investigation or other appropriate action. We have the specific qualifications based upon education, training, and experience to assess a property of the nature, history and setting of the subject property.

No recognized environmental conditions (RECs) in association with the subject property were revealed during this Assessment. No further investigation is recommended by UNIVERSAL for the purposes of identifying RECs.

UNIVERSAL identified the following Business Environmental Risk (BER) in association with the subject property during this Assessment:

- The site has been used as a golf course since the mid-1970s and utilized various fertilizers and associated materials/substances typical for golf course maintenance on a regular basis. No evidence of improper use, improper storage, spills/releases, or potential for significant environmental impact; therefore, no environmental issues are considered noteworthy for continued use as a golf course. However, it is UNIVERSAL's understanding that the subject property is expected to be converted to a nature/wetland preserve in the near future. The consistent use of the fertilizers and materials/substances associated with the golf course upkeep and unknown or latent land use practices may warrant investigation by regulators/stakeholders prior to an approved change in land use. Laboratory analyses for soil and groundwater may be required, along with a soil mitigation plan for any future development.

UNIVERSAL identified the following BER in association with the subject property during this Assessment:

- The site has been used as a golf course since the mid-1970s and utilized various fertilizers and associated materials/substances typical for a golf course facility on a regular basis. No evidence of improper use, improper storage, spills/releases, or potential for significant environmental impact; therefore, no environmental issues are considered noteworthy for continued use as a golf course. However, it is UNIVERSAL's understanding that the subject property is expected to be converted to a nature/wetland preserve in the near future. The consistent use of the fertilizers and materials/substances associated with the golf course upkeep and unknown or latent land use practices may warrant investigation by regulators/stakeholders prior to an approved change in land use.



UNIVERSAL Solutions, Inc.
Engineers, Scientists, Environmental Consultants

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Laboratory analyses for soil and groundwater may be required, along with a soil mitigation plan for any future development.

Not only is this a chief concern for the safety and wellbeing of the residents whose homes surround the site, but also if the soil is found to contain arsenic or other toxins, this will add considerable cost to the project; not only the handling and proper regulated dumping of the soil they wish to remove, but also the remediation of the soil left behind that they intend to build the BCMB on (an issue also raised by Universal Solutions). We highly doubt soil containing arsenic is conducive to creating any habitat of any kind as arsenic is incompatible with all forms of animal life. Inorganic arsenic is highly toxic to humans and the vast majority of living creatures, causing severe illness or death by disrupting cellular energy production. Arsenic is a known carcinogen and long-term exposure causes cancer, cardiovascular disease, and neurotoxicity.

If this falls on FDEP and not SWFWMD, we kindly ask that SWFWMD contact FDEP to loop them in, or make FDEP signing off on the testing as well as removal, and treatment of the spoil if it is found to contain arsenic, which again is highly likely.

From Letter of Clarification sent by SWFWMD on 9/19/2025 on **ERP Permit: 47575.001 (App: 907654)** which was not responded to by applicants -

DATE:	September 19, 2025
PROJECT NAME:	Brooker Creek Mitigation Bank
APPLICATION ID NUMBER:	907654
DATE APPL. RECEIVED:	December 06, 2024
APPLICATION REVIEWER(S):	
ENGINEERING:	Bob Dasta
ENVIRONMENTAL:	Lee Hughes

In order to provide that reasonable assurance is given for those "Conditions for Issuance of Individual and Conceptual Approval Permits" found in Rule 62-330.301, Florida Administrative Code (F.A.C.), and those "Additional Conditions for Issuance of Individual and Conceptual Approval Permits" found in Rule 62-330.302, F.A.C., the following additional information is required as indicated. The items requested are also extracted from Rules 62-330.060, F.A.C., "Content of Applications for Individual and Conceptual Approval Permits", 62-330.010(4)(a), F.A.C., "Southwest Florida Water Management District Applicant's Handbook Volume I", 62-330.010(4)(b)4, F.A.C., "Southwest Florida Water Management District Applicant's Handbook Volume II", and 40D-1.607, F.A.C., "Permit Processing Fee".

APPLICATION AND APPLICATION CERTIFICATION:

1. As previously requested, the District is required to issue permits to entity(ies) with a legal interest in the property containing the project area. Please provide deed(s) covering the entire project area demonstrating that Tarpon Woods Properties, LLC is the landowner and therefore has complete legal control of the entire project area. If Tarpon Woods Properties, LLC does not own the project area, please provide documentation supporting what entity(ies) have legal control of the project area and revise Section A accordingly. See Section 4.2.3(d) of the ERP Applicant's Handbook (A.H.) Vol. I for additional information regarding the acceptable ways in which legal interest can be demonstrated). [Rule 62-330.060, F.A.C.]
2. In accordance with Section 5.5.2.3 of the Applicant's Handbook Volume I (A.H.V.I), upon receipt by the District of an application for an individual permit to construct or alter a dam, impoundment, reservoir, or appurtenant work, a notice of receipt of the application must be published in a newspaper having general circulation (meeting the requirements of Section 50.031, F.S.) within the affected area in accordance with Sections 373.116, F.S., 373.118(3), 373.146, and 373.413(3), F.S. Please provide documentation that such noticing has been accomplished. Note that the published notices of receipt for an ERP can be in accordance with the language provided in Rule 40D-1.603(10), F.A.C., and receipt of an affidavit establishing proof of this publication will be considered a completeness item of this ERP Application.

SITE INFORMATION:

3. The proposed project site is operated and maintained as a golf course since the early 1970s. Golf courses have the potential for contamination in the soil/groundwater. As stated in the Phase I Environmental Site Assessment by Universal Solutions, Inc., "The consistent use of the fertilizers and materials/substances associated with the golf course upkeep and unknown or latent land use practices may warrant investigation by regulators/stakeholders prior to an approved change in land use. Laboratory analyses for soil and groundwater may be required, along with a soil mitigation plan for any future development." Please provide reasonable assurance that no adverse water quality

As an additional reference please see this document from FDEP-

<https://floridadep.gov/sites/default/files/Risks-associated-with-pesticides-volitalized-and-dislodged-from-gulf-turf-dec-02.pdf>

As applicants have been aware of the high likelihood the soil is toxic since 2017, as there are new concerns about alleged recent applications of an arsenic-based herbicide, as soil tests and a full report are in process with the Florida Department of Agriculture, and as the results of that testing could upend the ability of applicants to successfully execute the entire project, on these grounds we ask that SWFWMD delay their decision until the report is complete or deny the application.

3. Problematic and Still Incomplete Transfer of Ownership RE: the Course and Possible Attached Parcel(s) Tied to 1100 Tarpon Woods Blvd, Palm Harbor, FL 34685

Since the residents of Tarpon Woods and the surrounding neighborhoods became aware of this permit activity, we began pointing out that there has been no legal transfer of ownership. Applicants have received multiple reminders from SWFWMD on multiple applications and communications to do so or to file jointly with Jan Stephenson's Crossroads.

Applicants / parties for applicants repeatedly provide the following answer to this issue every time they submit an RAI Response, and nearly every time they are reminded this is an issue that makes their application incomplete-

"The deed providing Tarpon Woods Properties, LLC, with a sufficient property interest in the BCMB project area to serve as permittee and operation and maintenance entity is in the process of being recorded in the public records of Pinellas County and upon recording will be submitted to the District."

We know that wording like "in the process of being recorded" is vague, the wording we are using is not. No filing to change ownership is waiting on anyone within the Pinellas County Property Appraiser's office, as we have contacted the Pinellas County Property Appraiser's office recently and confirmed no paperwork has been filed regarding a change of ownership, such as a new deed, a DR430, has been filed for this parcel. The Pinellas County Property Appraiser's Office website also still shows there is no deed.

Miscellaneous Parcel Info ^							
Last Recorded Deed	Sales Comparison	Census Tract	Evacuation Zone	Flood Zone	Elevation Certificate	Zoning	Plat Bk/Pg
AAAA/AAAA	Find Comps	273.24	B	Current FEMA Maps	Check for EC	Zoning Map	/
2026 Preliminary Values ^							
Year	Just/Market Value	Assessed Value/SOH Cap	County Taxable Value	School Taxable Value	Municipal Taxable Value		
2026	\$1,191,420	\$1,191,420	\$1,191,420	\$1,191,420	\$1,191,420		
Value History ^							
Show 5 entries							
Year	Homestead Exemption	Just/Market Value	Assessed Value/SOH Cap	County Taxable Value	School Taxable Value	Municipal Taxable Value	
https://www.pcpao.gov	N	\$1,393,077	\$1,393,077	\$1,393,077	\$1,393,077	\$1,393,077	

"Under Florida law, the [transfer](#) of a non-homestead property (meaning: a property that isn't the primary residence of the owner) means:

- The sale or foreclosure of the property;
- The agreed-upon legal or beneficial title in equity to another person; or

- A transfer of control, or of ownership of more than 50%, of the legal entity that previously owned it when it was last assessed

In the Tarpon Woods situation, a bill of sale isn't enough for a property to legally change hands. Either the previous owners must file a change of ownership form with the Florida Department of Revenue, or a new deed must be recorded with the county's clerk of the court. Again, according to the Pinellas County Tax Collector's office neither has been done, and there's no way applicants are not aware of this.

Even the insurance company refused to write a quote to cover 1100 Tarpon Woods Blvd with Tarpon Woods Properties, LLC as the property owner and listed Jan Stephenson's Crossroads as the owner of all 3 parcels and Tarpon Woods Properties, LLC relegated to "as their interests may appear"-

4. The Title is, at the Commitment Date, vested in: *(Identify vesting for each estate or interest identified in Item 3 above)*

Jan Stephenson's Crossroads Foundation, Inc., a Florida not-for-profit corporation, by virtue of Special Warranty Deed recorded March 6, 2017 in Official Records Book 19542, Page 1389 (as to Parcel 1 and 2), and Special Warranty Deed recorded March 6, 2017 in Official Records Book 19542, Page 1397 (as to Parcel 3)

AND

Tarpon Woods Properties, LLC, a Florida limited liability company, as their interests may appear

The ERP Applicant's Handbook Vol. I 4.2.3(e) states- "Applications must be signed by an entity having sufficient real property interest over the land upon which the activities subject to the application will be conducted as described in section 4.2.3(d), above." It does seem to read that providing proof of sufficient real property interest is a requirement to file. On this most recent app they did check the box for Section G Part 6-

Part 6: Evidence of Sufficient Legal or Equitable Interest in the Property (62-342.450(6), F.A.C.)

Please provide the following information:

1. ☒ Evidence of sufficient legal or equitable interest in the property which is to become the mitigation bank to meet the requirements of Rule 62-342.650, F.A.C.

As the application wasn't signed by a party that has proven by the standards outlined by Florida law to have any legal or equitable interest in the property, as the applicant's handbook's rules are written that seems it would make this application null and void, or at a minimum incomplete, wouldn't it?

Based on our understanding of how this process works as informed by realtors in our community, what is available online by our county and state government, as well as what we have been told by and the updates we have received by the PCPAO, until they file it properly with the county, by Florida law, no transfer of ownership has taken place and we feel this calls the re-filing of this permit by current "ownership" into question as the filing entity has been repeatedly unable to show proof of ownership or real property interest for over 4 years.

As the status and the legality of the transfer of ownership is still in question 4+ years later, there has been no activity from parties with the Pinellas County Property Appraiser's Office, and as insurance providers won't accept an unstamped unfiled warranty deed as proof of ownership to give a written insurance quote and had to write it jointly with Jan Stephenson's Crossroads- a Non-Profit Organization NOT on this application- we feel on the same grounds they should not be allowed to continue to pursue the matter further with this agency until that vital step is completed. Tarpon Woods Properties does not own the land and therefore it is our understanding until that issue is resolved they have no authority to continue to seek or re-apply for this permit, and on these grounds we ask that SWFWMD deny the application.

4. Applicants Chronic Inability to Follow Guidelines Given by SWFWMD or Respond to RAI Deadlines with Complete Answers or File an Extension Request Inside the 90 & 30 Day Windows Provided

We take this issue very seriously. We feel the future of our neighborhood and our health is at stake and we are gravely concerned for our area's wildlife. We feel our actions as a group accurately reflect this.

Likewise, we feel applicants' actions also reflect a more lackadaisical approach to following guidelines, instructions, and deadlines provided by this agency (and others).

[Subsection 5.5.3.5, ERP A.H. Vol I] The applicant shall have 90 days from the date the Agency makes a timely request for additional information to submit that information to the Agency. If an applicant requires more than 90 days to respond, it must notify the Agency in writing of the circumstances, at which time the application shall remain in active status for one additional period of up to 90 days. Additional extensions shall be granted for good cause shown by the applicant. A showing that the applicant is making a diligent effort to obtain the requested additional information, and that the additional time period is both reasonable and necessary to supply the information, shall constitute good cause. In such case, a specified amount of additional time shall be granted at the mutual consent of the Agency and the applicant. **If the applicant chooses not to, or is unable to, respond to the request for additional information within the above time frames, the application shall be administratively denied without prejudice.** Such denial is not a determination of the merit of an application and does not preclude the applicant from reapplying at a later time. However, the applicant will not receive a refund of processing fees submitted, and the Agency will not apply those processing fees to a subsequently submitted permit application or notice. **An applicant who cannot provide requested information within the above time frames is encouraged to withdraw their application before the Agency takes action to deny it.**

In our interpretation of the ERP Handbook, it does seem to be in the spirit of these rules that giving incomplete answers like saying that the transfer of ownership is in progress but not asking for more time, as well as ignoring SWFWMD's request applicants include addressing the issues raised by Pinellas County in their RAI response and not even making mention of if or when they will provide any of the information, meets the definition of not providing the requested information within the specified time frame. While this latest filing did come some weeks before the latest extension ran out,

it neglects to answer issues which they know were set as a requirement by this agency, issues they have neglected repeatedly, and on these grounds we ask that SWFWMD deny the application.

5. Crunching the Numbers- Concerns with New Permit Adjustments that Don't Seem to Match Up to Us

With the current changes proposing less earthwork and a focus on upland habitats, approximately 30.82 of the requested 37.88 wetland mitigation bank credits, around 81%, would now be generated from upland "supporting habitat". Do these proposed upland areas provide enough ecological benefit to justify that many marketable "wetland" mitigation credits?

The proposed schedule gives applicants the ability to release 60% of the credits after legal prerequisites and construction had been initiated, but before any benchmarks for ecological success are set or met. Once credits are sold and used to offset wetland destruction elsewhere, if the bank becomes unviable the damage cannot be undone.

The current plan also calls for approximately 75 pine trees per acre, but the cost estimate appears to fund only 40 trees per acre.

We feel these issues and calculations raise need to be addressed, by our math these numbers should be recalculated, but additionally as the bank has still not been redrawn and recalculated for the mandatory 50 ft boundary from residential property lines applicants should not receive approval based on restoration commitments based off incorrect maps, acreage calculations, and that their own current financial estimate may not fully fund, and on these grounds we ask that SWFWMD delay or deny the application.

6. The Creation of the Brooker Creek Mitigation Bank Would Violate Multiple Pinellas County Codes and Ordinances- to Include the East Lake Tarpon Overlay

In addition to the issues already raised by Pinellas County, we would also like to make mention of The East Lake Tarpon Community Overlay. In accordance with Florida state laws and adopted 1/24/2012 by the Pinellas County BOCC as Ordinances 12-13, all plans and future changes of land use within the boundaries of the East Lake Tarpon Community Overlay must be consistent with its vision, objectives, and policies; which include the preservation of existing open green spaces & areas for recreation, as well as insuring, "all future development in East Lake Tarpon should be compatible with the community and fit within the community's characteristic land use types, density, height, and scale."

We have previously submitted these documents and can resubmit them if need be.

As the plans that have been submitted do not comply with Pinellas County Code, as no new plans or extension requests have been submitted since receiving notice from Pinellas County, and as the creation of the BCMB does not appear to comply with the development restrictions of the East Lake Tarpon Overlay, on these grounds we ask that SWFWMD deny the application.

7. Safety Issues and Concerns About Placing a Hazardous Area in the Middle of a Residential Neighborhood

When people think of a “golf course community”, retirees usually come to mind, but Tarpon Woods & Ridgemoor (and the many subdivisions within) are family communities. We just had a new family with young children move into the cul-de-sac next to ours, and they are in the back yard all the time. Nearly every other house on the north end of Annwood has children present.

Tarpon Woods & Ridgemoor currently have many ponds and mini lakes where alligators enjoy their lives and no one bothers them, they don't bother us, and no one gets hurt. The key difference is with a green open space like we enjoy now, danger can be spotted at a distance as alligators move from one pond to another. We live in harmony with these prehistoric predators, but that's in no small part because we can see them coming. When tall grasses near property lines, that creates a different playing field. The type of fencing isn't the issue- because we know gators will climb chain link and we personally advocated against chain link in our earlier communications due to the harm it would cause many other forms of wildlife- the issue is when tall grasses hide predators and when tall grasses and thick vegetation come into close proximity to residential homes we're going to have problems.

Kids aren't aware of property lines, and even children with the wherewithal to know the boundaries and read signs sometimes disobey their parents and ignore the rules- you don't have to be a child psychologist to know that. Kids love playing wilderness games like “man hunt”, so what happens if they wander into the bank to play hide and seek? What happens when they don't come out? We aren't lawyers so maybe the “No Trespassing” signs absolve the property owners of legal culpability, but what about conscience? Not only that, but children could be outside the mitigation bank fence but still be within striking distance of a predator they can't see. Its extremely dangerous especially during alligator mating season. There's a reason our nature parks where gators are present use elevated boardwalks. Common sense says this doesn't belong here.

Also dogs and errant pets. As much as everyone tries to be responsible pet owners, accidents happen, dogs get off leash or run out an open door, as do cats and other beloved house pets, and inevitably some will go into the mitigation bank. People are also going to go in there to try to rescue their pets, and the loss to the community might wind up being both pet and owner.

We also (hopefully) are just coming out the other side of a very bad drought. Many ponds were down drastically, and still are several feet below their average water level. These ponds are a lot deeper than the littoral shelves of the proposed BCMB. Where will the gators that inhabit the shallow wetlands go when they run dry (as this appears to be a very realistic possibility as they aren't fed by a larger water source)? Our pools? Gators break into pools in neighborhoods that aren't surrounded wetlands. Building a large shallow habitat for them in our backyards increases the odds. In our 10+ years living here without the wetland mitigation bank we've had to do things like shoo large water moccasins seeking water out of our garage and off our property. Wildlife can get desperate; alligators and poisonous snakes want to survive too, and as they both live here already, its important to point out the likelihood that their numbers will increase to fill the landscape that will accommodate them.

These questions may seem in bad taste, but these questions are something parents have raised concerns about in public meetings with the stakeholders of this project and with State and County legislators time and time again, literally every time we gather about it. Parents are worried about an environment that lends itself to being a home to alligators and poisonous snakes being just outside their back door. Kids are also going to be kids. When we were kids there was a huge construction boom in Pinellas County and we both played in construction sites. We knew we weren't supposed to do it, there were signs, but we did it anyway because we were children. At worst someone might step on a nail or get cut or scraped up, but we always came back home.

This is different, this is a larger more mortal danger, and with the changes to credit buying / mitigation banking rules giving developers more options to buy outside the area they are building, the demand to force a man-made bank into a spot in Pinellas County where one doesn't belong isn't as strong anymore.

Putting a wetland mitigation bank between homes in a residential neighborhood populated with children and pets just isn't prudent. While we do understand the financial motivations and desires for parties to create a man-made wetland mitigation bank in densely populated Pinellas County, with recent changes giving more flexibility for builders to purchase mitigation banking credits outside the area they are building in, the juice isn't worth the squeeze. Parents come to these meetings and have asked this question worded one way or another at every one, including the original clubhouse meeting with representatives from Greensource Environmental, 5MCivil, Jan Stephenson's Crossroads, and Tarpon Woods Properties, LLC as well as their PR representative at the time, Kyle Parks. Parties can't say they aren't aware of parents' concerns and the potential dangers this project may bring with it. We can't speak to liability, but if one child dies in that bank that harm can't be undone and there's no dollar amount that will fix it or would justify introducing the potential for harm into these family neighborhoods, and on these grounds we ask that SWFWMD deny the application.

8. The Proximity to Residential Homes Would Make This Man-Made Wetland Non-Viable Due To Existing Land Use Surrounding the Bank & the Lack of Precedence Creating a Wetland Mitigation Bank Inside and Surrounding Homes in a Pre-Existing Residential Neighborhood

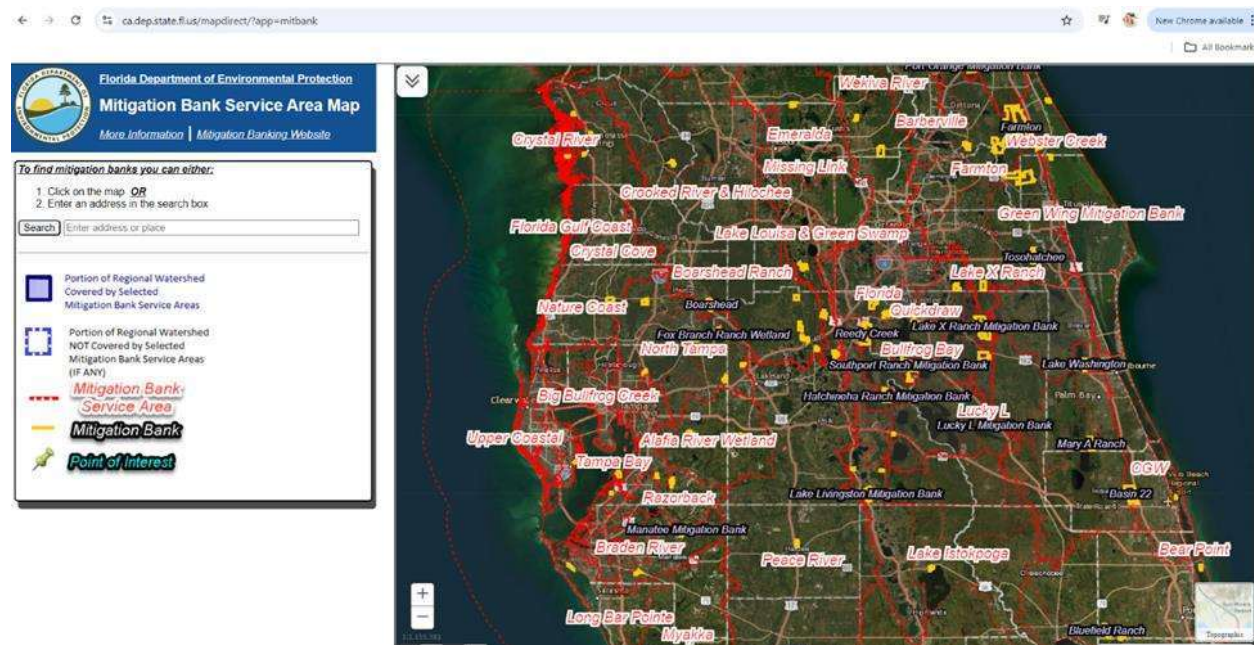
Due to the proximity to residential homes, Pinellas County Code necessitates the spraying of pesticides to control mosquitos. Also, there is no way to prevent the run off from residential yards that have been treated with fertilizers, pesticides, and herbicides from flowing into the proposed mitigation bank with every rain. As demonstrated in the footage post Hurricane Milton, when the area experiences heavy rain, the water that collects on the Tarpon Woods Golf Course (a plain that is higher than the proposed BCMB) connects to the water that floods the streets (<https://youtu.be/OkUH01m6gqM?si=0dnnPJfhXRVD9qUs>) which also connects to the storm drain system.

It should also be noted the level of flooding during Milton was not a one-off event. Its at least the 3rd time we the Pinellas County Sheriff's Office has had to ferry residents in and out using duck boats / high water vehicles in our time here. It happens so frequently that we put a lift kit and larger tires on one of our personal vehicles last year so we can better assist our neighbors when the next major rain event comes, because it inevitably will.

Additionally, the county pumping water from the roads into the pond system does remain the neighborhood's only flood mitigation plan. While we are pleased to learn future plans may include

keeping the pond system and incorporating it into the BCMB, the water pumped off those streets also contains run off from roadways and will contain traces of oil, antifreeze, and other chemicals and pollutants. Also, the successful pumping is reliant on the culverts that connect the ponds being maintained and functional. The reason for this is the water being pumped into one pond spreads its level across the many. We have concerns due to the extreme vegetation growth that was allowed to transpire the roots from vegetation such as pine trees that were allowed to grow may have infiltrated and clogged or otherwise compromised this system in existence for decades.

This combination of factors seems to be in opposition with the creation of a “pristine” wetland environment.



(<https://ca.dep.state.fl.us/mapdirect/?app=mitbank> <https://ca.dep.state.fl.us/mapdirect/?app=mitbank>)

We have looked at the majority of existing wetland mitigation banks, not just in our county and the greater Tampa Bay area, but across the state, and we have yet to find a single example of a wetland mitigation bank being built inside an existing neighborhood surrounded on all sides by pre-existing homes. This project as well plans to also include enveloping two areas of Tarpon Woods (homes off Annwood Rd and Toniwood Ln) within the center of it.

GreenSource Environmental, the same team working on this permit, when applying to this agency to secure the permit for Big Bullfrog Creek as a Wetland Mitigation Bank, stated that, “surrounding land uses are compatible with Bank establishment, being mostly rural or low density residential development.” Tarpon Woods meets neither of these descriptions. The homes that border Tarpon Woods Golf Course are a mix of single-family homes, villas, townhomes, duplexes, triplexes, and quadplexes, as well as condos and apartments. The homes off Annwood Rd and Toniwood Ln are single family homes that will be pockets of homes surrounded by man-made wetlands on all sides.

upland mesic oak hammock, are significantly under-represented in the conservation network. The wetland and upland buffer habitats exhibit varying degrees of degradation, but are not so degraded that they cannot be restored effectively. Upon restoration, these habitats will contribute to aquatic resources in the watershed. The Bank's landscape position is extremely beneficial because the Bank is adjacent immediately downstream to the 1,984 acre component of the Balm Scrub and completes a protected corridor to another tributary to Bullfrog Creek located on another area of the Balm Scrub (694 acres) immediately adjacent and contiguous to the northeast. The BBFCMB is hydrologically and ecologically connected through an FNAI Priority Ecological Greenway (identified by the University of Florida's Geoplan Center) one mile upstream of the 1,593 acre Bullfrog Creek Scrub. Balm Scrub is one of Hillsborough County's largest freshwater conservation areas in the Basin and is permanently protected from future development. The Balm Scrub functions as a central hub of conservation lands throughout the surrounding area; Big Bullfrog Creek provides a hydrological and wildlife corridor to habitats along Tampa Bay. The BBFCMB will complement the Balm Scrub by protecting additional acres and will function as a wildlife corridor along Big Bullfrog Creek to Bullfrog Creek Scrub and ultimately to Tampa Bay. The addition of the BBFCMB project will improve water quality flowing into Tampa Bay and restore a more natural hydroperiod to Big Bullfrog Creek by reducing "flashy" inputs. A significant amount of the entire acreage (30%) and the wetlands (48%) of the upstream drainage basin is already protected, ensuring that the aquatic functions are sustainable in the long-term. **Other surrounding land uses are compatible with Bank establishment, being mostly rural or low density residential development.**

The Bank is identified as Priority 2 Aggregated Resource Priority by the State of Florida's Critical Lands and Waters Identification Project (CLIP) (FNAI 2012) (Exhibit A: FNAI Conservation Needs Assessment); the Bank is targeted for acquisition by SWFWMD (SWFWMD 2011) and is located in the Southern Water Use Caution Area (SWUCA); and the Bank is targeted for acquisition by the Environmental Lands Acquisition and Protection Program of Hillsborough County (Hillsborough County 2016), all of which indicate the Bank's high value to watershed management plans of various landscape scales. The Bank also contains habitat for a variety of federally and state-listed species, including Suitable Foraging Habitat for three (3) overlapping wood stork (F-E) Core Foraging Areas and upland habitat utilized by the gopher tortoise (F-C, S-T). Many other listed species are expected to occur onsite based on the Bank's habitat diversity, size, and hydrological and ecological connectivity with downstream conservation lands. The project area contains significant aquatic resources that can be restored and persist in perpetuity with proper stewardship.

Many federal and state-listed threatened and endangered species are expected to utilize the habitats on BBFCMB. Six (6) listed species were observed onsite, while another ten (10) listed species have the potential to occur based on habitat suitability (FFWCC 2005, USFWS 1999). Please refer to **Figure 10: Listed Species Potential Habitats** and **Table G4: Listed Species**, which

(Big Bullfrog Creek Environmental Resource Application, Section G, pg

12 <https://www18.swfwmd.state.fl.us/Erp/Export/ViewDoc/3bwqwfss.pdf>)

If, "mostly rural or low density residential development" is compatible with establishing a wetland mitigation bank, should one also conclude- especially as this application is being written by the same firm that wrote the Big Bullfrog Creek application- that suburban density single family homes, and higher density townhomes, duplexes, triplexes, quadplexes, villas, condos, and apartments are incompatible with wetland mitigation banking?

It should also be noted in addition to not locating any test cases for creating an artificial wetland mitigation bank inside & surrounding a neighborhood, we found nothing in the application paperwork to mitigate the risks of erosion to these existing properties, with the boundaries of littoral shelves coming

right to the edge of property lines. While we now know to meet Pinellas County Code they will have to redraw these boundaries 50 ft back, it is concerning knowing the risks to the neighborhood and the incompatibility, they chose to push ahead.

This seems that it should be a major responsibility of mitigation bank creators that they take measures that they do no harm to current area residents, and that should include taking steps to preserve the soil stability of the surrounding and surrounded properties, as well as ensure their wetland construction activities would not make the flooding worse as they must be well aware this is an area with a history of severe flooding, and would do all they could do to not put these homes at greater flooding risk.

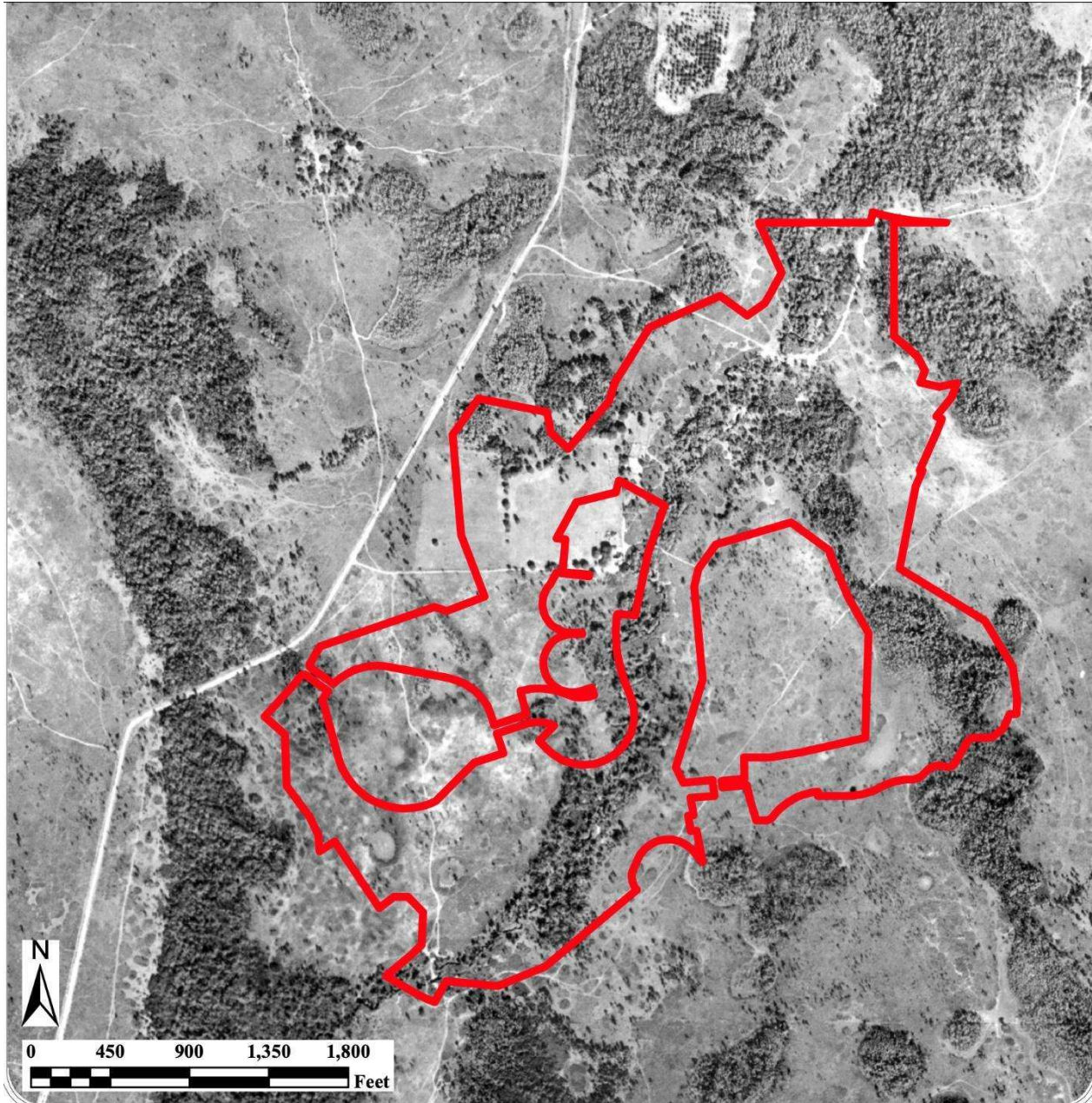
This land, due to its close proximity with residential homes, makes it unsuitable to be used for the purpose of establishing a pristine environment to properly establish a man-made mitigation bank, especially when we know banks built in more suitable areas have failed. County mandated mosquito spraying, along with the runoff from lawn care chemicals and fertilizers, not to mention scatological material non-native species such as domesticated family dogs, we believe prevent this creation from ever being “pristine”.

We would prefer our neighborhood, a home to retirees and new families alike, not serve as the test case for trying something seemingly unprecedented in the state of Florida, in an area that should be unsuitable based on the arguments presented in past application by the same firm in favor for the designation of Big Bullfrog Creek as a Wetland Mitigation Bank by GreenSource Environmental. Our concern only grows given applicants' continued demonstrated disregard for following normal legal protocols by ignoring and carrying over known unresolved errors and legal issues from their previous applications, and on these grounds we ask that SWFWMD deny the application.

9. Mischaracterization of "Restoring" / "Returning" the Land to its Previous or Natural State, As Its Natural State Was Never Wetlands

In their new application, parties for applicants state many times that they are restoring the land to wetlands and returning the area to its natural state.

On the prior application #889588 we pointed out that the land that is now Tarpon Woods Golf Course, Tarpon Woods, and the surrounding neighborhoods were not wetlands, but were historically plains that became ranch / cattle lands and provided an aerial photo of the area prior to development taken in 1945 as proof of this fact.



In their new application, parties for applicants state that the land had been altered prior to the 1945 photo, as it was assumed by parties for applicants that cattle ranchers cleared a portion of the trees. Tree removal was the only alteration stated by applicants.

In their new application, parties for applicants state that the land had been altered prior to the 1945 photo, as it was assumed by parties for applicants that cattle ranchers cleared a portion of the trees. Tree removal was the only alteration stated by applicants.

While we cannot state for a fact that trees were cleared or not cleared by ranchers using the land in the 1940s, we feel it is unreasonable to assume that the removal of trees would have in any way raised the

elevation of the land to create a prairie where applicants imply prior to the removal of said trees submerged wetlands were present.

Fortunately when it comes to the historical presence of wetlands we don't have to guess at this. This area's history is richly documented. As we noted before, this area was known as Boot Ranch because East Lake was all once, literally, the "Boot Ranch".

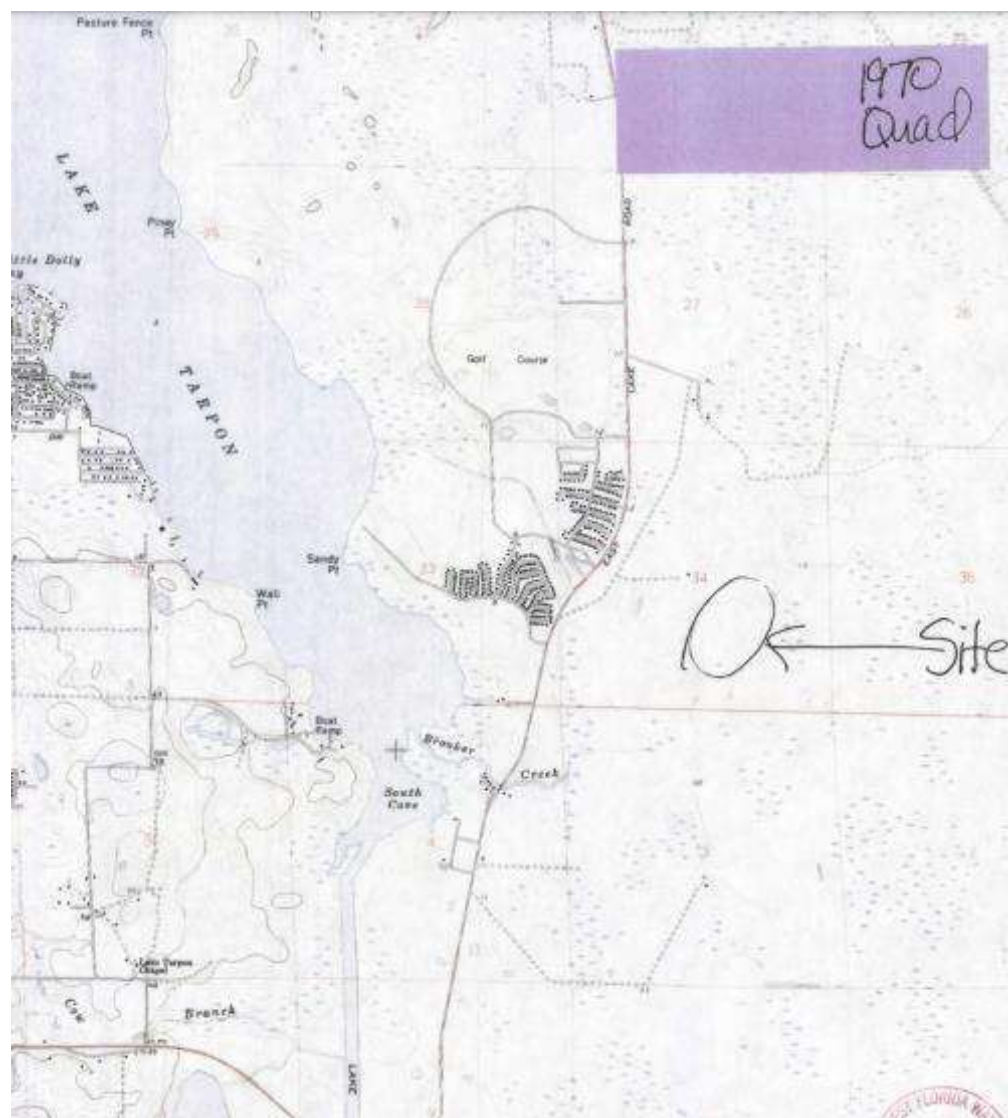


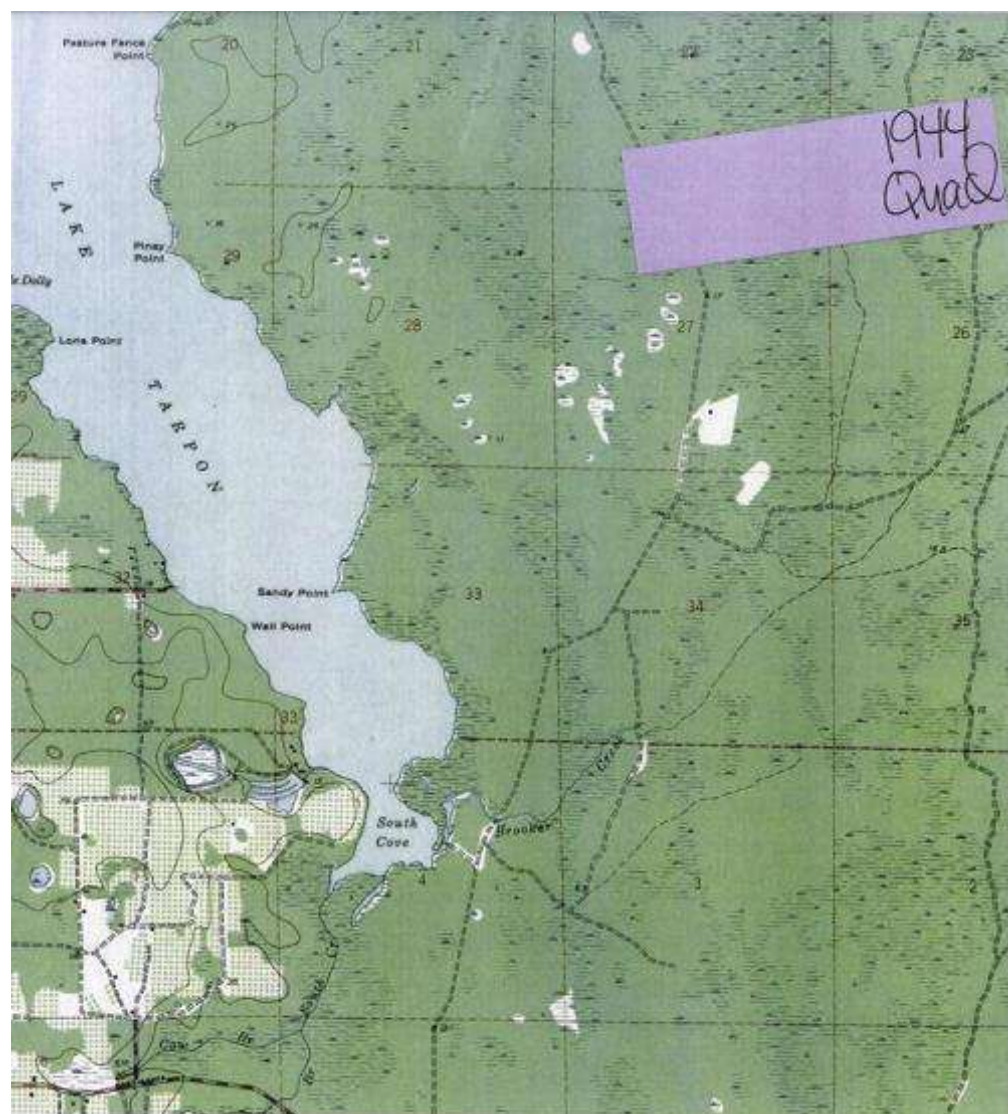
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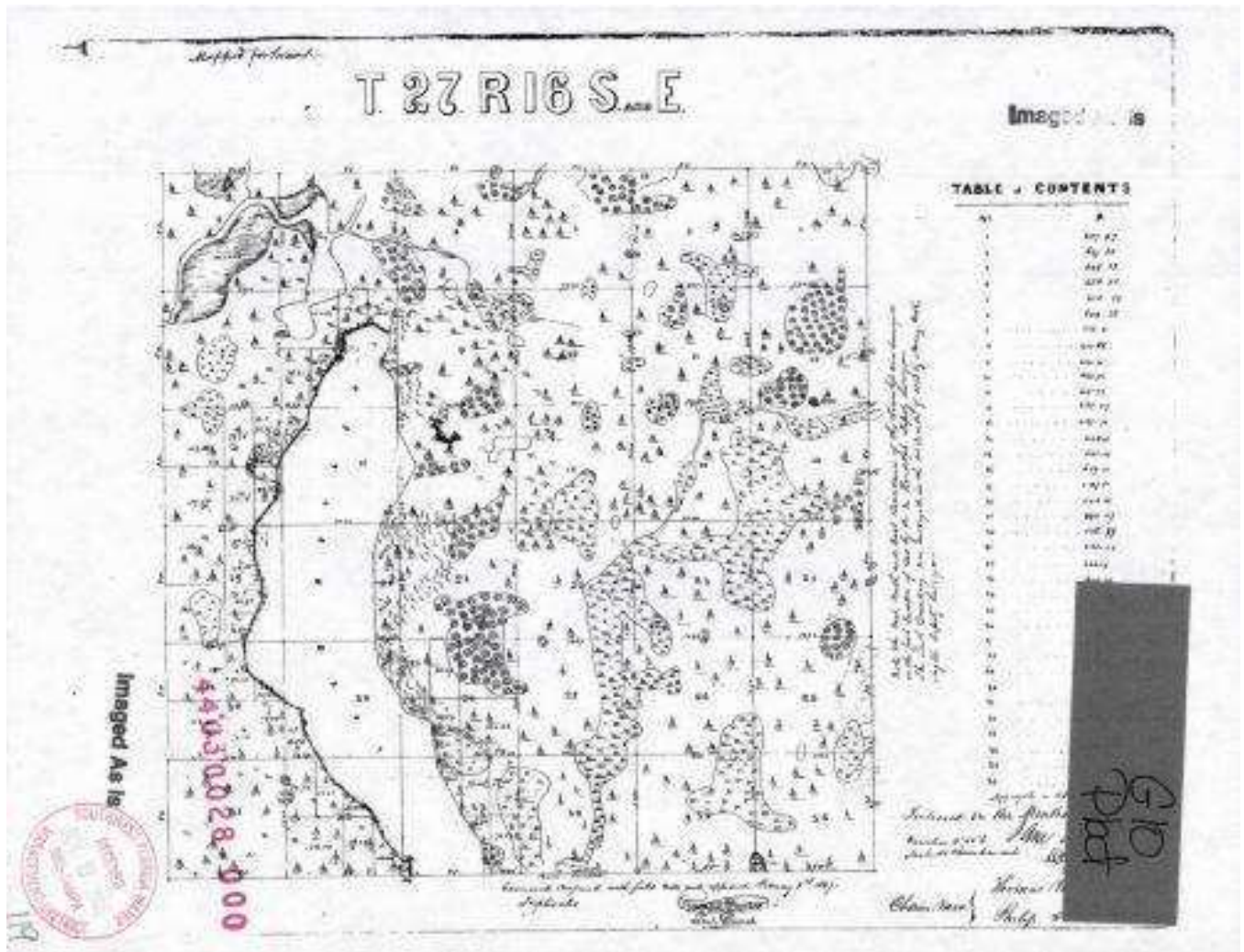
<https://patch.com/florida/palmharbor/al-boyd-made-east-lake-possible>

<https://www.tampabay.com/archive/1998/06/01/east-lake-rancher-alfred-boyd-made-and-saved-history/>

We also looked up older permits for the area on swfwmd.state.fl.us and found with permit # 30028 (application # 57947) project title "Pinellas Co- Tarpon Woods Drainage Improvement" there are hand drawn maps of the area dating all the way back to 1847. We are including the following maps from pg 65 to pg 67 of the 2005 application package showing the project area (Section 34, Township 27 South, Range 16 East, Pinellas County). You can see from these maps that while the area bordering Brooker Creek and some of the land where East Lake Road is now was wetlands, were preserved nearly in their entirety and the area where the neighborhood and golf course are currently located has never been.







All of the maps going back to 1847 (which predates Boot Ranch) seem fairly consistent, for section 34 all historic maps show wetlands centered on the area bordering brooker creek and in the wooded area which is now reserved for brooker creek's overflow, were all preserved by the past builders almost in their entirety. The top boundary of 34 is essentially Ridgemoor Blvd.

That this land was originally Pine Flatwoods, not marsh or any other wetland other than Brooker Creek and its overflow area. As I know that Mr. Hughes has made site visits, I imagine Mr. Hughes has noticed the rare amount of older mature trees on the parcel which is atypical of Golf Course and Residential Development. These trees pre-exist the course and the neighborhood, and none of them on the course have pine knees. Brooker creek and the overflow are also the only area on the site where pine knees are present indicating the past existence of wetlands.

Universal Solutions also reached this same conclusion and in their report included in the Environmental Information document attached to prior permit application on pages 244 to 247 of the Environmental

Information attachment, Appendix B includes additional aerial photography that covers the period of from 1943 to 1973, just before construction began.

As the maps do not show wetlands where the Golf Course currently exists going all the way back to 1847, a period of nearly 200 years, we feel its fair to conclude that wetlands did not previously exist in a reasonable time period to call the man-made earth removal they hope to achieve in this area a "restoration" or "returning the area back to its natural state". Its closer to its natural state in its current condition.

It should be noted that according to the EPA's Federal Guidance for the Establishment, Use, and Operation of Mitigation Banks they state multiple times that remediating existing wetlands are preferable to man-made / created wetlands as remediated wetlands have a much higher chance of establishing successfully, while man-made created wetlands are less likely to succeed and therefore considered more risky. The EPA also provides the following guidance regarding man-made mitigation banks, "Banks posing a greater risk of failure and where credits have been debited, should have comparatively higher financial sureties in place." - <https://www.epa.gov/cwa-404/federal-guidance-establishment-use-and-operation-mitigation-banks>

As no wetlands ever existed in the area that is now Tarpon Woods Golf Course other than the current hardwood wetlands that were preserved by the original builders and still exist to present day, the destruction of this course cannot be called "wetland restoration", and on these grounds we ask that parties edit their application to reflect that this will be a man-made wetland mitigation bank and not a restoration, and also adjust the proposed escrow amounts accordingly. If parties refuse to do so on these grounds we ask that SWFWMD deny the application.

10. Flooding Concerns in the wake of Hurricane Milton

Our area was hit by the right side of Hurricane Helene as it passed by Tampa Bay on Sept 26th. Damage to our area was minimal when compared to a much closer strike by Hurricane Milton on October 9th - 10th as the eye passed just below Tampa Bay, making landfall in Siesta Key. The rains were heavy, and the flooding to our area was severe.

A neighbor sent a drone up after the storms had passed. This footage is the most recent footage after the storm, and is of particular interest as this video features the area between the Tanglewood Patio Homes, The Meadows, and the north end of Annwood Road with focus on Tarpon Woods Golf Course holes #3-#7, or more precisely one of the areas proposed to be raised to build "new uplands", and one of the two spots on the map submitted with this application marked for "Potential Residential Development."

You can view the October 10th, 2024 video here - <https://youtu.be/OkUH01m6gqM>

The water collected on the course is rain water from Hurricane Milton. You can see it is pooled up forming many new ponds and lakes on the course. You can also see how flooded Tanglewood Trail is, and especially how flooded The Meadows are.

At one point, captioned in the video, you can also see down the Tarpon Woods Golf Course to the Clubhouse and get a good picture of just how flooded the front 9 of the golf course became. We would like to remind you while viewing this video and the videos that follow that the proposed new wetlands will fill all the ponds up to within 1 foot of their annual high water mark.

Oldsmar resident Mike Boylan, of Mike's Weather Page, paid the Tarpon Woods neighborhood a visit on October 11th. He shot a video segment for his own website and social media accounts documenting the flooding and Pinellas County Sheriff's Deputies activity ferrying residents in and out of the Tarpon Woods neighborhood using PCSO's high water vehicles. You can view his coverage at this link- <https://www.instagram.com/reel/DBAE9J0BdUR/?igsh=eW0wYmxrZWZldWpl>

The video package used to create Mike's story went national, being picked up by several major cable news channels including Fox News Network.

Lastly one of our resident realtors had a drone operator come out to document the flooding on October 11th. In the October 11th drone video you can see some of the flooding on the back 9, as well as the flooding on Toniwood Lane and Jennifer Terrace of Tarpon Woods. Not included due to range was the flooding of the neighborhoods where Tarpon Woods Blvd meets Ridgemoor Blvd that are considered a part of Ridgemoor; which are Oakridge, Briarwick, and Wescott Square.

The October 11th, 2024 video is available here- <https://vimeo.com/1019143961/47b93c687c>

This proposed plan does not merely fail to include any flood mitigation considerations for the existing residents of Tarpon Woods and the surrounding communities, but by removing the deep water ponds and their connecting culvert system it eliminates the only flood mitigation plan Pinellas County has in place for the area (pumping rainwater into the ponds on the golf course from the worst affected neighborhood streets).

While the proposal does state applicants would like to continue to allow Pinellas County to bring out the pumps and pump storm water collecting on high risk streets into the wetland mitigation bank if allowed, this does not seem to be a practice that is in keeping with the pristine standards wetland mitigation banks are expected to maintain. While mostly rain water, the water being pumped from the streets into the mitigation bank will contain some level of chemical run off as automobiles leak oil and other fluids that build up on the pavement and unfortunately will contaminate the rain water to a degree that does not seem compatible with the standards set forth by the EPA. GreenSource should provide a solid answer in their proposal and not use loose language in an attempt to placate residents and county government leaving the door open to a possibility that does not seem probable.

What we see in these videos is the 2007 study paid for by Pinellas County and performed by Tampa Bay

Alternative 1 Flood Plain Storage Pond

- No flood relief
- Need conveyance instead of storage
- Not feasible

Figure 4
Alt 1 - Flood Plain Storage Pond

TBE GROUP

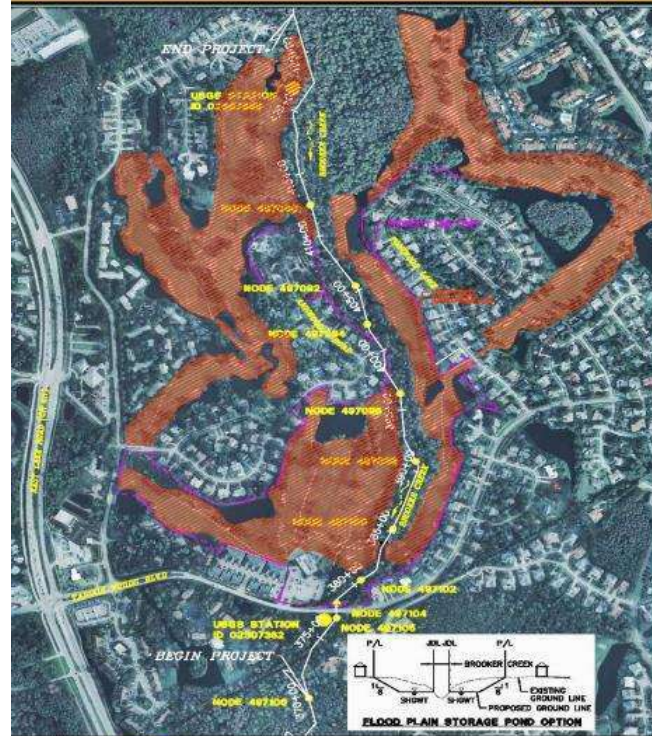


Figure 4
Alt 1 - Flood Plain Storage Pond



Figure 4
Alt 1 - Flood Plain Storage Pond



Conclusions

- Converting golf course to a pond is not feasible
- Flow improvements are required to provide flood relief
 - ▶ Channels or culverts
- Construction costs range from \$5.4 to \$22.3M (2007 dollars)
 - ▶ Does not include land costs
- Watershed study underway by SWFWMD
 - ▶ Study may provide additional improvements and cost benefits
 - ▶ Final improvements should be based on findings from both studies
 - ▶ Critical to obtain matching funds for construction
- Additional lands downstream of bridge should be considered for conveyance and maintenance access
- In the interim – continue with current measures for flood relief



This model was one that turned the entire course into a pond, one much deeper than the littoral shelves / shallow hardwood wetlands planned that will see the deep water ponds filled up to within 1 ft of the annual high water mark.

According to the 2007 study, new underground channels or culverts are what is needed. There are buyers who are willing to purchase the Tarpon Woods Golf Course legally and at market value, work with Pinellas County to let them make needed changes to ease flooding of existing residential areas, and keep construction at a minimum while keeping Tarpon Woods Golf Course a Golf Course.

We have included the slide deck from Tampa Bay Engineering's report to Pinellas County, as well as Tampa Bay Engineering's actual report itself (google drive link at the bottom of this document) with areas of interest highlighted.

Should this permit be granted and built-to-print, the existing residents' flood issues will not just persist, they will be exponentially compounded. This has been studied, and the results of the flooding that Hurricane Milton wrought upon the area do appear to back up those studies. These existing

neighborhoods cannot afford to lose the existing deepwater pond system in place on that land, and while it is a positive that the ponds will likely remain, as the ponds are only effective if the culverts that connect them are maintained and working, and as some of these ponds will be integrated into the BCMB it is highly unlikely that both Pinellas County could pump flood waters off the streets into the mitigation bank and strict wetland mitigation bank standards could be met, and on these grounds we ask that SWFWMD deny the application.

11. Addressing Claims That Creating the Man-Made Wetland Mitigation Bank Will Not Disrupt Current At-Risk and Protected Wildlife Species and Creating Man-Made Wetlands Will Attract "New" At-Risk and Protected Wildlife

It has been long enough since the permits were originally filed, as the area has been through several major weather events, and as we have documented and submitted evidence of several protected species in our communications with SWFWMD living on the course that are not included in applicant's documents, we feel a new, more accurate, wildlife survey should be taken.

"It also is important that ecologically significant aquatic or upland resources (e.g., shallow sub-tidal habitat, mature forests), cultural sites, or habitat for Federally or State-listed threatened and endangered species are not compromised in the process of establishing a bank." - <https://www.epa.gov/cwa-404/federal-guidance-establishment-use-and-operation-mitigation-banks>

The Tarpon Woods Golf Course is currently home to the following at risk species-

*new Glossy Ibis (*protected*)

*new Swallow-Tailed Kite (*imperiled*)

*new Yellow Crowned Night Heron (*protected*)

American Alligator (*federally threatened, monitored*)

Eastern Diamondback Rattlesnake (*monitored, declining, under status review*)

Gopher Tortoise (*state threatened & state protected*)

Florida Kingsnake (*threatened*)

Little Blue Heron (*state threatened, imperiled*)

Reddish Egret (*state threatened*)

White Ibis (*imperiled*)

Bald Eagle (*protected*)

Wood Stork (*federally threatened, imperiled*)

Osprey (*imperiled*)

Roseate Spoonbill (*state threatened, imperiled*)

Limpkin (*imperiled*)

Florida Sandhill Crane (*state threatened*)

Cyprus Fox Squirrel / Southern Fox Squirrel (*state threatened, imperiled*)

Monarch Butterflies (*imperiled*)

List of species on FWC's Endangered and Threatened as well as Imperiled lists

(<https://myfwc.com/wildlifehabitats/wildlife/>) that neighbors have submitted photos of to verify their current activity in the area of the Tarpon Woods Golf Course and abutting residential properties.

There is no way to remake the earth where all these threatened, endangered, and protected species currently reside, create a completely different and manmade habitat, and be able to say with any level of certainty that none of these animals will be harmed and which species, if any, will return. Meanwhile the course and neighborhood in its current state continues to attract, be a safe wildlife corridor for, and serve as a home to increasing numbers of monitored wildlife as it exists now.

This proposal is a drastic change to the land and changing the terrain from wide open green space to fenced off / enclosed wetlands. While we do applaud the change in fencing material from chain link, as we were told at the in person meeting, to smooth wire, which will have less impact and cause less injury to land animals, it is not the same as zero impact and no injury, which they enjoy now.

In the community meeting held at the Tarpon Woods Golf Course Clubhouse with Ryan Diebler from GreenSource Environmental and Jesus Merly from 5M Civil property owners were told construction of the wetland mitigation bank was estimated to take 1 year and would result in **total displacement** of all wildlife in the area, though PR representative for Tarpon Woods Properties, LLC, Kyle Parks, said it may be possible for the wildlife to "move around" to different areas of the site during construction. We find it concerning that this idea was born of an improvisation by parties' PR representative and not backed by any qualified wildlife experts.

"There is conservation lands to the north and to the south so it (proposed wetland mitigation bank site, Tarpon Woods Golf Course) provides a corridor between existing conservations lands." – Ryan Deibler, GreenSource Environmental Professionals Inc.

Pinellas County Development Review Committee Meeting on Brooker Creek Mitigation Bank Project held on 07/01/2024, time stamps 2:55 -3:01 text in parenthesis added for context, not part of quote <https://player.vimeo.com/video/997208128?h=aa38acd0c4>

Construction will not be building a corridor; the corridor already exists and is in use and this has been recognized by everyone from FWC to parties' own GreenSource Environmental.

Most of the species GreenSource states their man-made wetland hopes to attract after construction has been completed already call Tarpon Woods Golf Course home. Tarpon Woods Golf Course was built in 1971 and despite recent neglect has remained largely unchanged. When it was well maintained it was known for its incorporation of the area's mature trees and natural beauty.

Even if the course is ripped up and rebuilt a piece at a time, the process will still be destroying a 50+ year old established habitat for multiple protected species during a time when the majority of the Tampa Bay Area's surrounding habitats have been destroyed and wiped out due to storm damage from a catastrophic hurricane season for Manatee, Hillsborough, and Pinellas Counties is extremely ill-advised.

Wildlife rehabbers and professionals we have spoken with have said the new claim that the changes will be done one area at a time as to not disrupt wildlife is both unrealistic in its expectation that wildlife will populate one part of the course while there is heavy machinery, trucks, and construction ongoing, and also pointed out that this was always something that will need to be done in phases. Construction will take at least a year and while construction is ongoing wildlife will be frightened and will avoid the Tarpon Woods area. After Storm Damage and Contamination, Tarpon Woods Is Now More Important Than Ever to Wildlife Preservation

While the Tarpon Woods area did flood, the water on the course was rain water, and unlike many other habitats that were flooded, the water that collected on the Tarpon Woods Golf Course was not tainted by sewage or salt water. Also, while we did lose some trees, the vast majority of the trees survived the battery of hurricane force winds.

We spoke to **Barbara Walker, a Permitted Wildlife Rehabilitator who has worked for and with many of the most prestigious wildlife and environmental organizations in the Tampa Bay area**, for her thoughts on the effects of replacing the Tarpon Woods Golf Course with a wetland mitigation bank the and received her permission to share her communication to us with you-

"Further burdening the environment in Pinellas County is not advisable. Wildlife organizations are overwhelmed each spring from baby season. We had Debby, Helene, and now Milton. (After these storms) Some of the organizations are barely salvageable. A lot of habitat is severely compromised. We do not know what the beach nesting birds will do or what changes may take place. We also do not know how the Bald Eagle or Osprey populations will do next season. The bald eagles in Pinellas did not do well last year and have been struggling around Lake Tarpon for years. Disturbing anything else right now, including Tarpon Woods Golf Course which connects Lake Tarpon and Brooker Creek (Preserve), would be mismanagement of resources and would further stress the wildlife organizations that are working at capacity in what is supposed to be our slow season. It is important that they leave it alone and not disturb all the wildlife in the county at one time."

After both hurricanes Helene and Milton we saw bird populations flourish. Some photos taken after the storms of imperiled, threatened and / or protected wildlife on the course featuring Roseate Spoonbills, Wood Storks, a Little Blue Heron, White Ibis, and a Gopher Tortoise.











Video of Swallow-Tailed Kites filmed this July- https://youtube.com/shorts/vxTAF_LDL3w?feature=share

A pair of Bald Eagles on the course the morning of November 1st, 2025 in the trees near the 10th green and north of the driving range. A video of the pair-

<https://youtube.com/shorts/4nubqWxAnpY>



A screen grab of the video included above.

We feel this is of importance as Barbara Walker specifically mentioned the Bald Eagles (a federally protected species) in the East Lake area have been going through a rough time. Barbara has 3 permanently injured / non-releasable Bald Eagles under her care at present, and earlier the year before last a nesting family was destroyed when the adult male eagle and both eaglets were killed by eating poisoned squirrels (source- <https://www.elwcondo7.com/news.php>). Truly a tragedy.

An article from October 22nd from the Tampa Bay Times-

Hurricane Milton was yet another pollution nightmare for Tampa Bay

More than 30 waterways across Tampa Bay were polluted when infrastructure couldn't keep up.

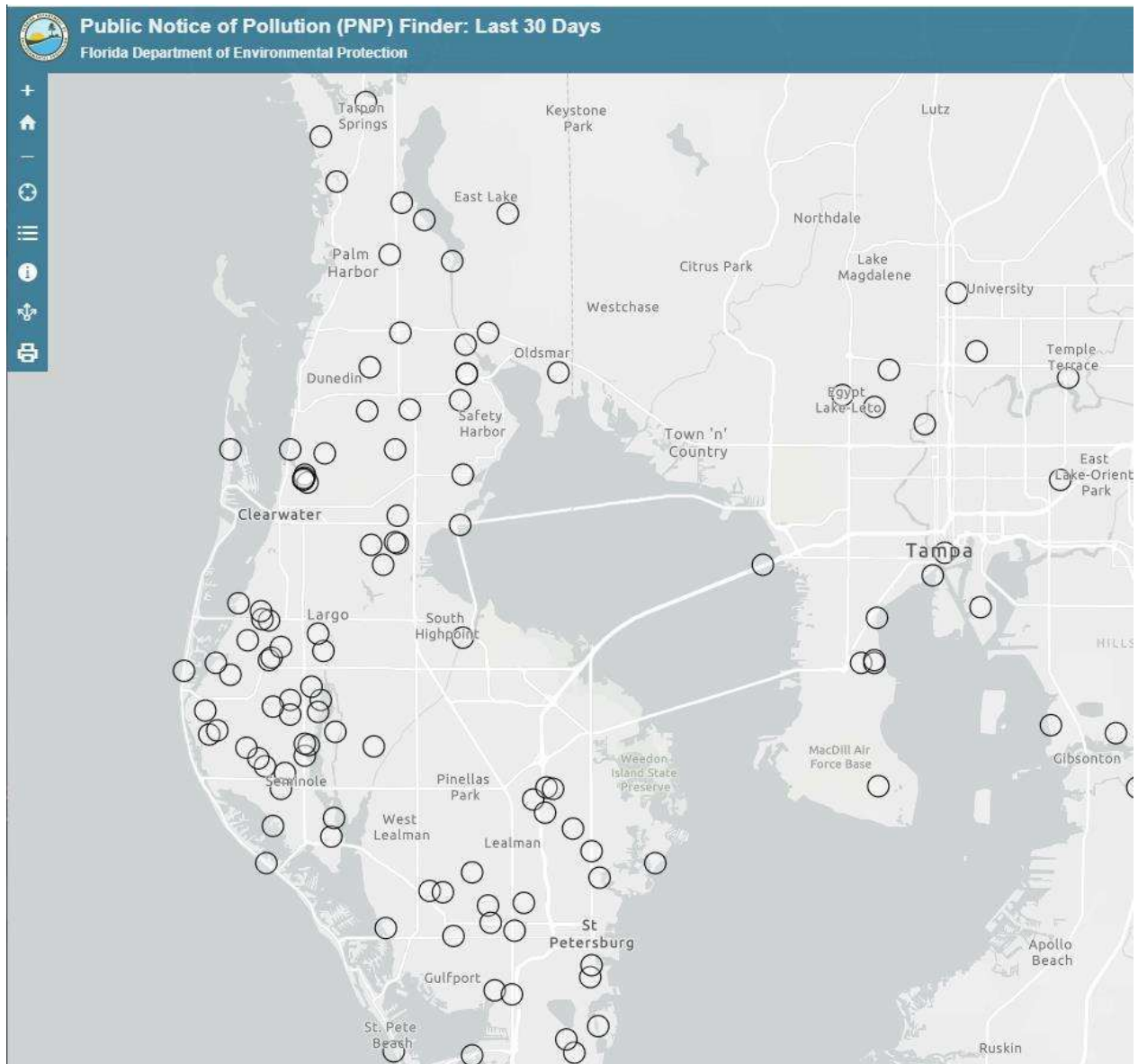


<https://www.tampabay.com/news/environment/2024/10/22/hurricane-milton-was-yet-another-pollution-nightmare-tampa-bay/>

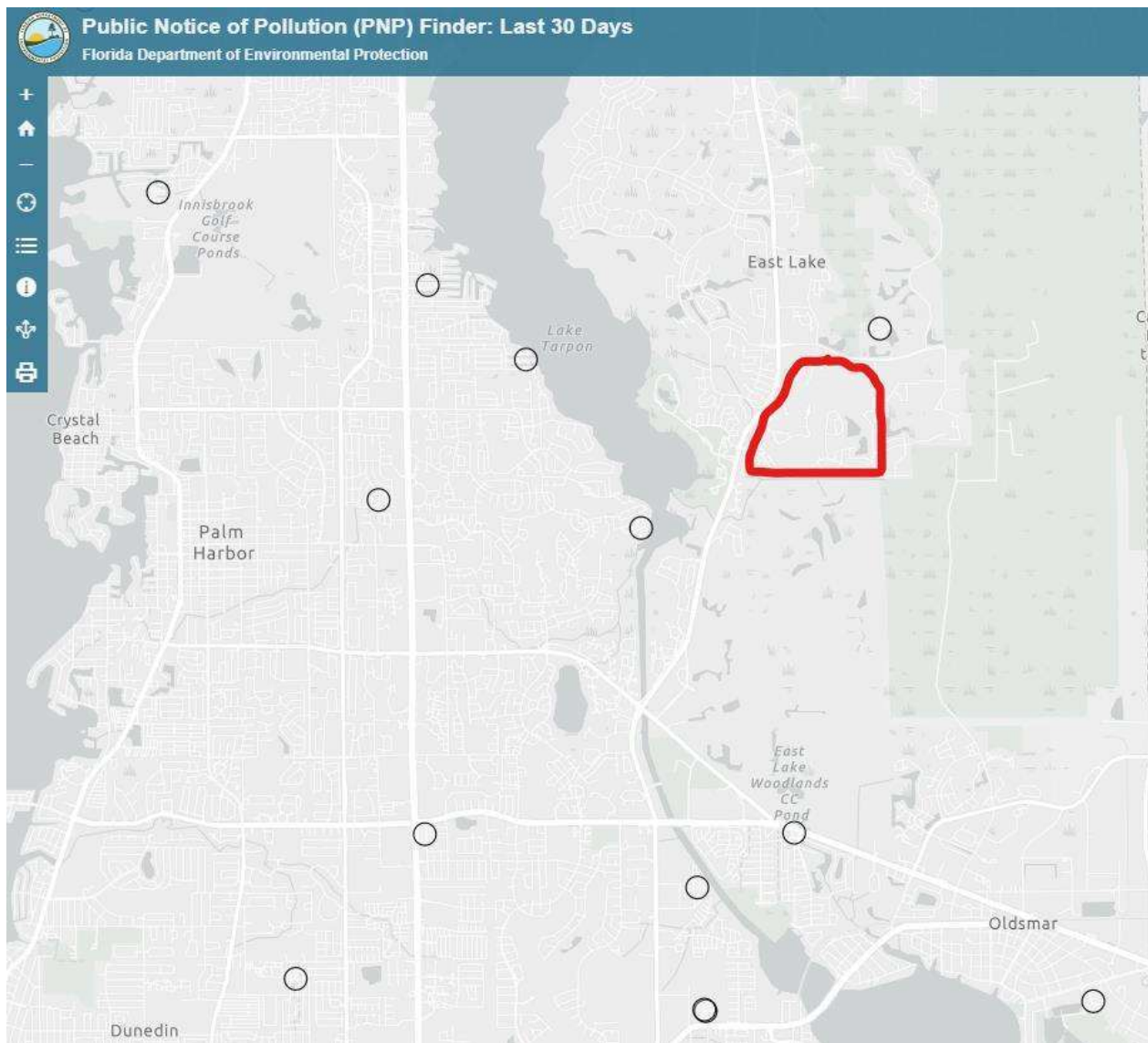
And a screen shot from an interactive map put out by the Florida Department of Environmental Protection showing all pollution events in the last 30 days after hurricane Milton.

The Tampa Bay Area-

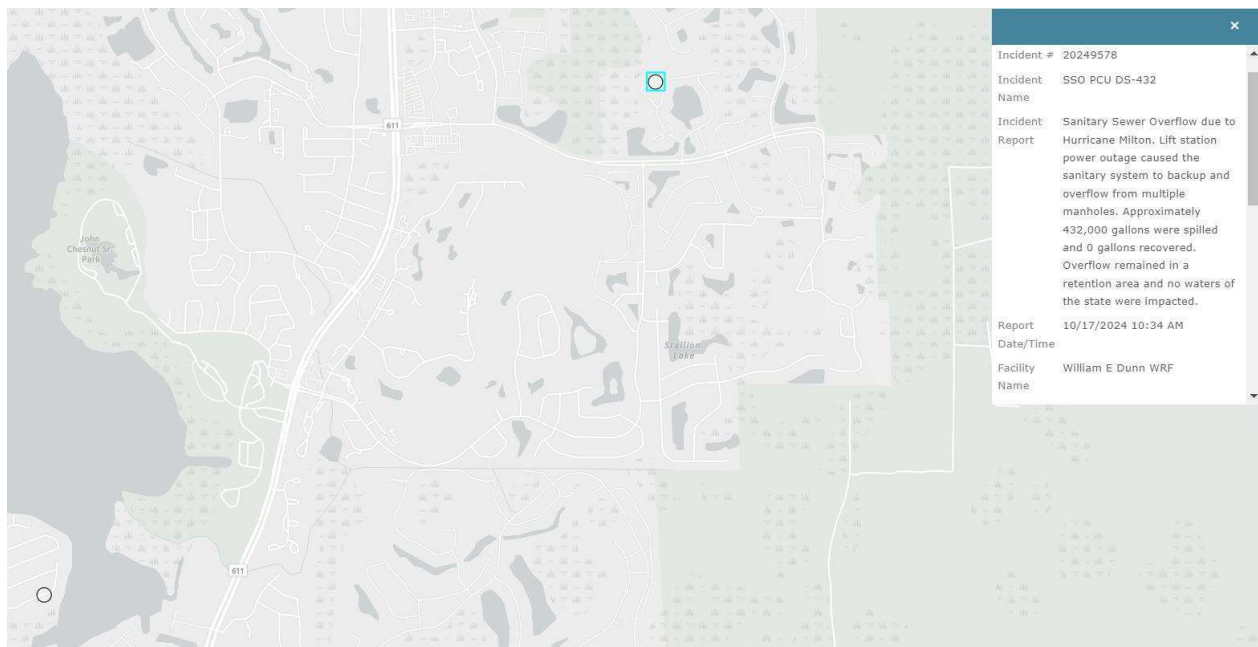
East Lake / North Pinellas



Tarpon Woods Golf Course and Surrounding Neighborhoods marked out in Red-



The nearest pollution event located north of Tarpon Woods in Ridgemoor, on the other side of Ridgemoor Blvd, this contamination event was self-contained to local retention ponds and did not come in contact with the course or pollute Brooker Creek



As the storms badly damaged, contaminated, and / or irreparably harmed many, if not most, of the surrounding wildlife habitats in Pinellas County, the destruction of Tarpon Woods Golf Course- one of the few remaining safe spaces for these species at this time, or any time in the coming years until a full restoration of surrounding habitats is complete and repopulation of threatened, protected, and imperiled species can be verified- is ill advised, on these grounds we ask that SWFWMD deny the application.

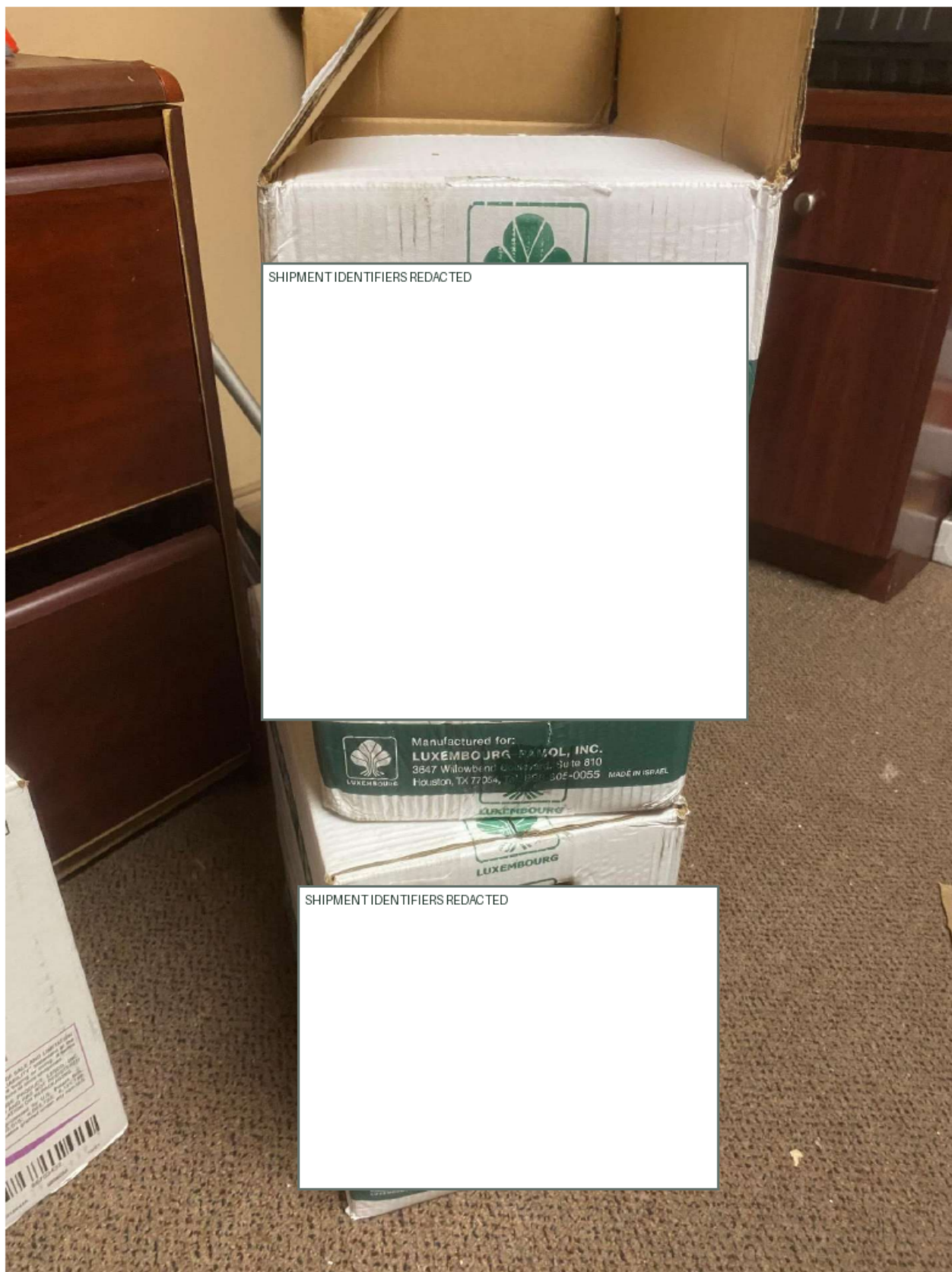
The fact that Tarpon Woods is such an environmentally important area is precisely why it is so important not to disrupt it. Show any Florida wildlife advocate these pictures- a picture of 5 roseate spoonbills, 6 wood storks, a little blue heron, a pair of bald eagles, and a gopher tortoise, then let them know these pictures and video were all taken within the last 3 months of each other, they will tell you what the experts we spoke to told us, that this property needs to not be disturbed. This action is not creating a wildlife habitat, its destroying one. Additionally a project of this magnitude, affecting such a variety of nature in an existing wildlife corridor deserves an updated detailed wildlife survey, on these grounds we ask that SWFWMD delay the application until one is produced.

Destroying the existing habitats of rare and endangered wildlife to create a new man-made wetland mitigation bank that will take generations to re-create even a fraction of what already exists here is nonsensical from an ecological / environmentalist perspective and only makes sense from a land developer's economic point of view, and on these grounds we ask that SWFWMD deny the application.

In summary, this project has the potential to negatively impact our community's health, endanger the lives of children, seniors, and pets, disrupt the main wildlife corridor between a wildlife preserve and a

state park for a period of at least 2 years (we feel realistically it will be longer), and displace multiple rare, protected, endangered, and imperiled wildlife species in the process. Everything the BCMB promises to create, this area already has. Also applicants' past and current behavior should be cause for concern with any agency or regulatory body. When we look at applicants, we see a group with a history of neglecting its grounds and cutting corners with safety by committing acts such as endangering the public on multiple occasions by allowing them to enter a building deemed "Unsafe" with an official Do Not Enter notice posted by Pinellas County saying, "Entry May Result In Death or Injury" after the roof of the clubhouse collapsed due to neglect. They then performed unpermitted demolition of a building as we were under hurricane warning when Helene was approaching as a Cat 3 and all our law enforcement and county employees were on Activation. While Zone A was under Mandatory Evacuation (this included parts of Tarpon Woods), they filled multiple open dumpsters with hazardous debris (wood, broken glass, concrete, etc) and secured them with plywood and bungee cords, endangering a large part of the neighborhood. We received bands as Helene passed and if any of the makeshift plywood covers had come loose everything in those dumpsters had the potential to become a deadly missile harming homes and potentially causing bodily harm to residents.





PRIVATE SHIPPING LABEL REDACTED

They may make the argument that those actions were performed by Jan Stephenson's Crossroads, and Tarpon Woods Properties, LLC is a separate entity, but the individual who kept opening the building to the public, oversaw the unpermitted demolition, and who's name appears on the boxes of banned arsenic based herbicide Target 6 Plus with the golf course's address on them was also a registered agent of Tarpon Woods Properties, LLC during this application process. Also, it was a lawyer from Hill Ward Henderson (who formerly represented Tarpon Woods Properties, LLC) who appeared on behalf of Tarpon Woods Properties, LLC who negotiated a plea agreement with Pinellas County Code Enforcement just before their case was heard by the magistrate, an agreement they haven't lived up to.

Additionally, we can't answer why its taking over 4 years to legally transfer ownership, but they've never tried to explain it either. If it takes over 4 years to file the paperwork they know is necessary to get this permit, and we know they have a history of not obeying the county or local law enforcement agencies, and we've seen how this permit process is going, we have nothing to give us faith that somehow they are going to reverse course and start coloring inside the lines any time soon.

The more time passes the worse things seem to get from our perspective as residents.

You have the future of our community in your hands.

On behalf of the many concerned residents of Tarpon Woods, Ridgemoor, and the surrounding East Lake area, thank you for your attention to this matter.

The Hollidges

Proud residents of Tarpon Woods since 2015

HOME ADDRESS REDACTED