



LOCAL GOVERNMENT COMPREHENSIVE PLANNING COMPLIANCE

Southwest District

Charlotte Harbor Region
Big Cypress Region
Terra Ceia Preserve State Park

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Big Cypress Region



Lee County
Southwest Florida

Board of County Commissioners

Kevin Ruane
District One

August 12, 2026

Cecil L. Pendergrass
District Two

David Mulicka
District Three

Brian Hamman
District Four

Trish Petrosky
District Five

Dave Harner, II
County Manager

Richard Wm. Wesch
County Attorney

Donna Marie Collins
County Hearing
Examiner

Summer Waggerby & Meghan Burke
Florida Department of Environmental Protection
Division of Recreation and Parks/Park Planning
3900 Commonwealth Blvd
Tallahassee, FL 32399

Re: Lee County Comprehensive Plan Consistency:
Estero Bay Preserve State Park
Koreshan Historic State Park
Mound Key Archaeological State Park
Lovers Key State Park
Gasparilla Island State Park
Cayo Costa State Park
Charlotte Harbor Preserve State Park
Unit Management Plan Update

Ms. Waggerby & Ms. Burke,

Thank you for your submittal of the Florida Department of Environmental Protection Division of Recreation & Parks Southwest District Unit Management Plans. Lee County has reviewed the management plans provided and has determined that the conceptual improvements, located within unincorporated Lee County, are consistent with the Lee County Comprehensive Plan. As outlined in Lee Plan Policy 2.1.3, all land use categories and Planning Districts permit the consideration of public uses and buildings, public recreational uses, and public facilities when consistent with the goals, objectives, policies, and standards of the Lee Plan and applicable zoning and development regulations. **Koreshan Historic State Park** and **Lovers Key State Park** are located entirely within the jurisdiction of the Village of Estero and the City of Bonita Springs; therefore, Lee County did not provide comments on these Unit Management Plans.

Estero Bay Preserve State Park

Conceptual improvements within unincorporated Lee County include new interpretive elements, trail enhancements, expanded fencing, drainage improvements and a permanent restroom facility. The portions of the State Park within unincorporated Lee County are located within the Conservation Lands (Uplands and Wetlands), Outlying Suburban, Suburban and Wetlands Future Land Use categories. These conceptual improvements, as identified within the Conceptual Land Use section of the Unit Management Plan, are in compliance with the Lee County Comprehensive Plan.

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Conceptual improvements include trail and paddlecraft landing improvements and new interpretive elements. The State Park is located within the Conservation Wetlands, Outer Islands and Wetlands Future Land Use Categories. These conceptual improvements, as identified



Lee County
Southwest Florida

Board of County Commissioners

within the Conceptual Land Use section of the Unit Management Plan, are in compliance with the Lee County Comprehensive Plan.

Gasparilla Island State Park

Conceptual improvements include beach dune restoration, repaving and delineating parking spaces, repairs to beach access boardwalks, construction of a permanent restroom, seawall replacement, removal of non-historic elements, installation of historical interpretative elements, stabilization and preservation of the Amory Chapel, ingress/egress improvements to the Dunes and Port Boca Grande Lighthouse Use Area, hurricane damage repairs, establishment of beach access and construction of a pole barn and new administrative building to support staff. The State Park is located within the Conservation Lands Uplands, Public Facilities, Urban Community and Wetlands Future Land Use categories. These conceptual improvements, as identified within the Conceptual Land Use section of the Unit Management Plan, are in compliance with the Lee County Comprehensive Plan.

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Conceptual improvements within unincorporated Lee County include new interpretive elements and implementation of visitor use management protocols. These conceptual improvements, as identified within the Conceptual Land Use section of the Unit Management Plan, are in compliance with the Lee County Comprehensive Plan.

Lee County's Department of Community Development appreciates the opportunity to review your updates to these management plans and looks forward to working with your agency in the future.

Sincerely,
Department of Community Development

Brandon Dunn, Planning Manager
Planning Section

Waggerby, Summer M

From: Parker Klopf <Parker.Klopf@collier.gov>
Sent: Thursday, August 13, 2026 10:38 AM
To: Waggerby, Summer M
Cc: Burke, Meghan; Alsentzer, Daniel
Subject: RE: Collier County Comprehensive Plan and Draft UMP Comparison Review Request
Attachments: con designation FLUE.pdf

Good Morning Summer,

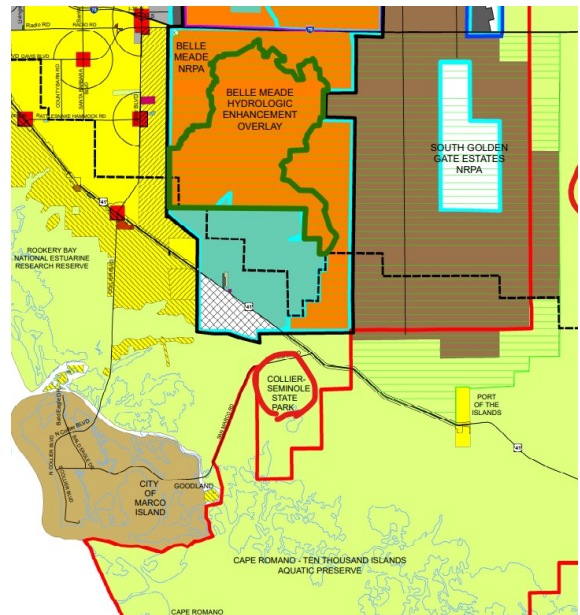
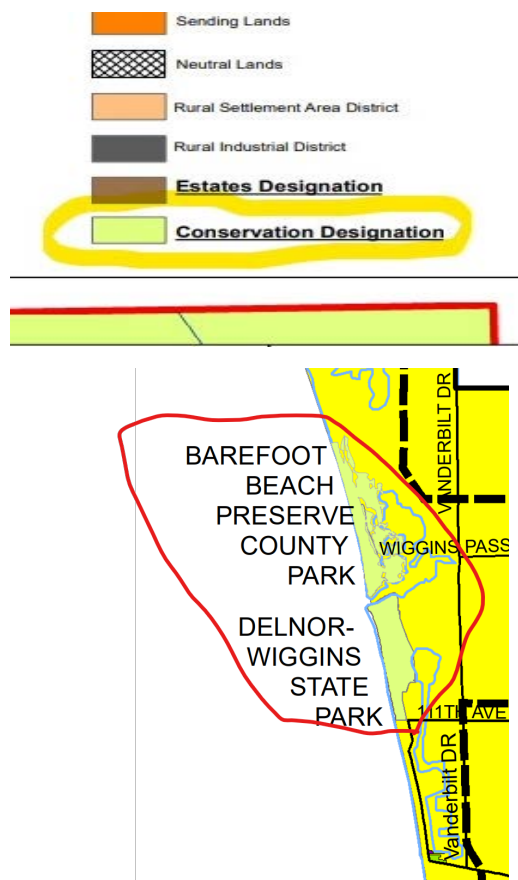
I took a look at our Future Land Use Map and can confirm that all three state parks you have identified are within the Conservation designation of the Future Land use Map. The color coded FLUE map delineates the mint green color identified below as the conservation district. Please see the pictures I attached showing the delineation. I have also attached a copy of the conservation designation from the FLUE. Please let me know if you have further questions or need clarification on anything.

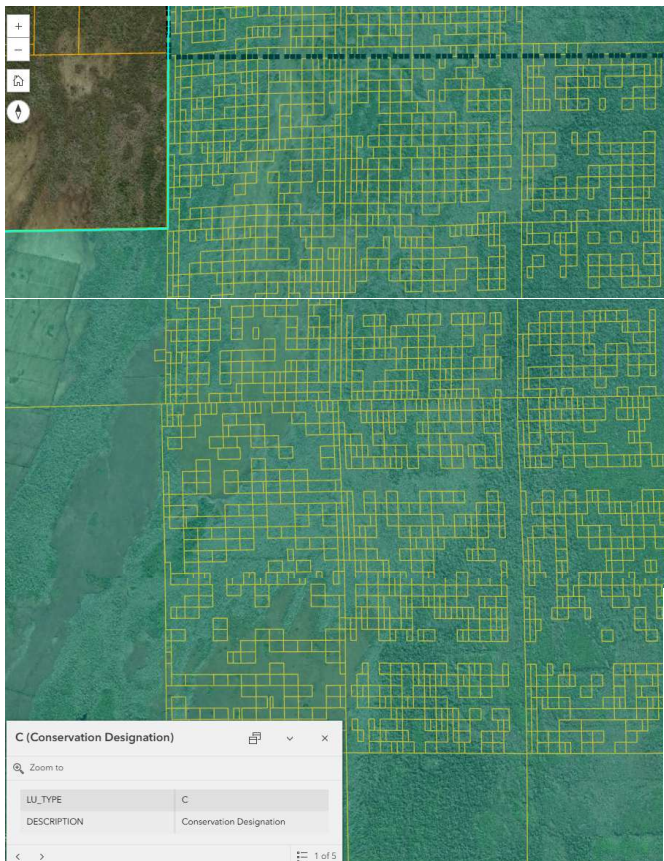
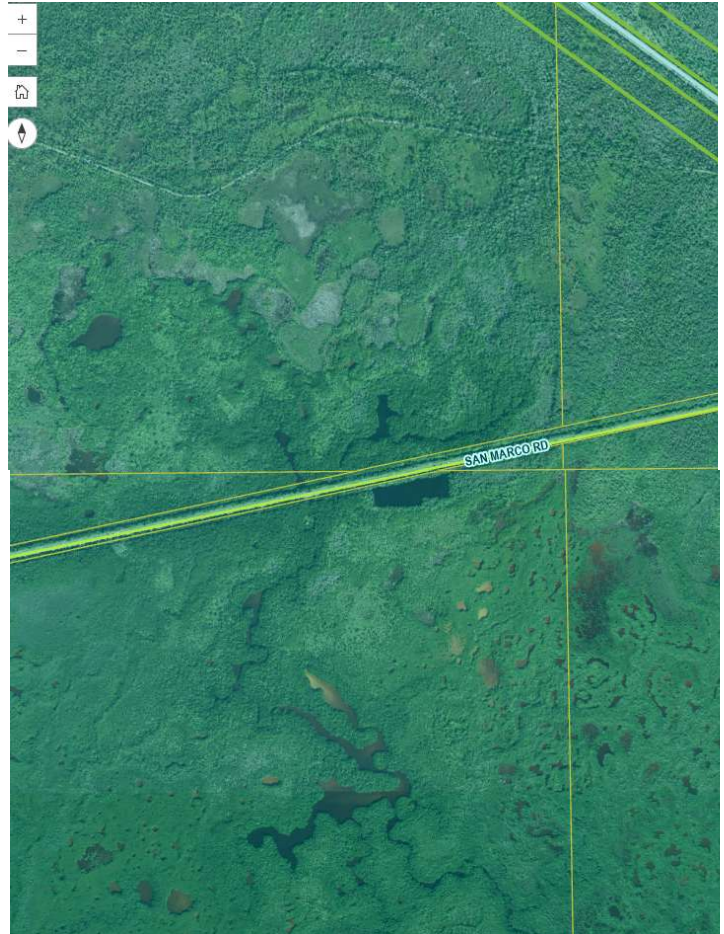
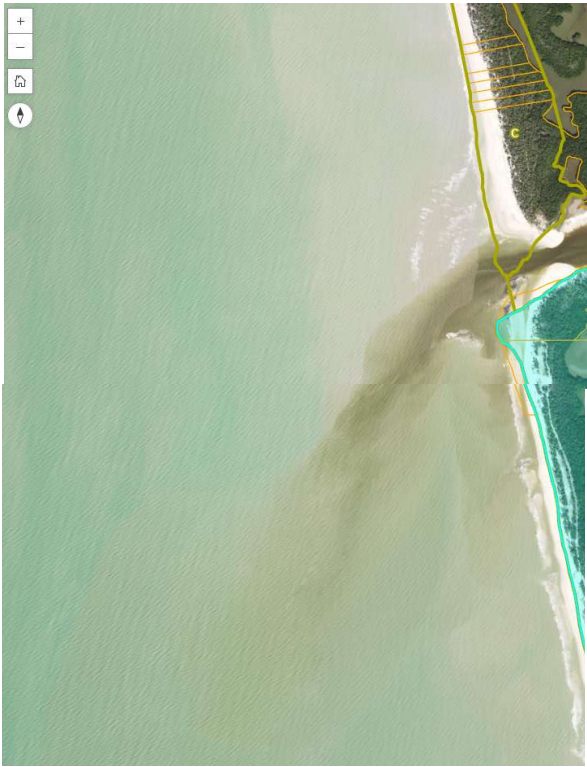
Link to FLUE Map

<https://www.collier.gov/files/assets/county/v/1/growth-management/documents/growth-management-plan/flum-011525.pdf>

link to FLUE

<https://www.collier.gov/files/assets/county/v/1/flue-amended-ord-2024-46.pdf>





Parker Klopf
Planner III
Zoning

Office: [239-252-2471](tel:239-252-2471)

2800 N Horseshoe Dr.
NAPLES, FL 34104
Parker.Klopf@collier.gov



My email address has changed. Effective immediately, please update your contact list to use this new address: Parker.Klopf@collier.gov

(VII)(IX) **IV. CONSERVATION DESIGNATION**

The overall purpose of the Conservation Designation is to conserve and maintain the natural resources of Collier County and their associated environmental, and recreational and economic benefits. All native habitats possess ecological and physical characteristics that justify attempts to maintain these important natural resources. Barrier Islands, coastal bays, wetlands, and habitat for listed species deserve particular attention because of their ecological value and their sensitivity to perturbation. It is because of this that all proposals for development in the Conservation Designation must be subject to rigorous review to ensure that the impacts of the development do not destroy or unacceptably degrade the inherent functional values.

(VII)(IX) The Conservation Designation is intended to protect certain vital natural resource areas of the County, which are primarily owned by the public, although private in-holdings and privately owned conservation areas do exist. This Designation includes such areas as Everglades National Park, Big Cypress National Preserve, Florida Panther National Wildlife Refuge, Fakahatchee Strand State Preserve, Collier-Seminole State Park, Rookery Bay National Estuarine Research Reserve, Delnor-Wiggins Pass State Recreation Area, and the National Audubon Society's Corkscrew Swamp Sanctuary (privately owned). The boundaries of the Conservation Designation may periodically change as properties are acquired by public entities or private land management or conservation groups.

(VII)(IX) Natural resource protection strategies and standards for development in the Conservation Designation are found in the Conservation and Coastal Management Element and the County's Land Development Regulations. The Conservation Designation will accommodate limited residential development and future non-residential uses. The following uses are authorized in this Designation.

(VII)(IX)(XIV)

a. For privately held lands, single family dwelling units, and mobile homes where the Mobile Home Zoning Overlay exists, at a maximum density of one dwelling unit per five gross acres, or one dwelling unit per 3 gross acres for private in-holdings within the Big Cypress National Preserve in existence prior to October 14, 1974 - each dwelling unit must be physically situated on a minimum five acre parcel, or minimum 3 acre parcel for private in-holdings within the Big Cypress National Preserve in existence prior to October 14, 1974. This Plan does not allow residential density on publicly owned lands.

(VII)(IX) b. For publicly and privately held lands, dormitories, duplexes and other types of housing, as may be incidental to, and in support of, conservation uses;

(VII)(IX) c. Group housing uses subject to the following density/intensity limitations:

- Family Care Facilities: 1 unit per 5 acres;
- Group Care Facilities and other Care Housing Facilities: Maximum Floor Area Ratio (FAR) not to exceed 0.45;

(VII)(IX) d. Sporting and Recreational camps incidental to Conservation uses on public lands; or, on privately held lands, within which the lodging component shall not exceed 1 unit per 5 gross acres, which may be achieved through clustering;

(VII)(IX) e. Habitat preservation and conservation uses;

(VII)(IX) f. Passive parks, and other passive recreational uses;

(VII)(IX) g. Agricultural uses consistent with Chapter 823.14(6) Florida Statutes (Florida Right to Farm Act);

(XIV) = Plan Amendment by Ordinance No. 2005-25 on June 7, 2005

(VII)(IX)(XXV)

- h. Essential Services necessary to serve permitted uses identified in Section a through g above such as private wells and septic tanks.

(VII)(IX)(XXVII)

- i. Essential Services as follows, necessary to serve Urban areas or the Rural Transition Water and Sewer District: utility lines, except sewer lines; sewer lines and lift stations, only if located within non-NRPA Conservation Lands, and only if located within already cleared portions of existing rights-of-way or easements, and if necessary to serve a publicly owned or privately owned central sewer system providing service to urban areas and/or the Rural Transition Water and Sewer District; and, water pumping stations and raw water wells necessary to serve a publicly owned or privately owned central water system providing service to urban areas and/or the Rural Transition Water and Sewer District.

(XXVII)

- j. Essential Services necessary to ensure public safety.

(VII)(IX)(XXVII)

- k. Oil extraction and related processing. Where practicable, directional-drilling techniques and/or previously cleared or disturbed areas shall be utilized to minimize impacts to native habitats.

(VII)(IX) The following uses may be permitted as Conditional Uses:

- a) The following uses are conditionally permitted subject to approval through a public hearing process:
 - (1) Essential services not identified above in Paragraph h. and i. Within one year, Collier County will review essential services currently allowed in the Land Development Code and will define those uses intended to be conditionally permitted in Conservation designated lands. During this one-year period or if necessary until a comprehensive plan amendment identifying conditionally permitted essential services, no conditional uses for essential services within Conservation designated lands shall be approved.
 - (2) Staff housing in conjunction with safety service facilities and essential services, at a density in accordance with the Land Development Code, as it existed on June 19, 2002.
 - (3) Commercial uses accessory to permitted uses e, f and g above, such as retail sales of produce accessory to farming, or a restaurant accessory to a park or preserve, so long as restrictions or limitations are imposed to insure the commercial use functions as an accessory, subordinate use.
- b) In addition to the criteria set forth in the Land Development Code, Conditional Uses shall be allowed subject to the following additional criteria:
 - (1) The applicant shall submit a plan for development that demonstrates that wetlands, listed species and their habitat are adequately protected. This plan shall be part of the required EIS as specified in Policy 6.1.7 of the Conservation and Coastal Management Element.
 - (2) Conditions may be imposed, as deemed appropriate, to limit the size, location, and access to the conditional use.

(XXVII) = Plan Amendment by Ordinance No. 2011-28 on September 13, 2011



Joanne Ribble
Mayor
District One

Jeffrey Hunt
District Two

Jon McLain
District Three

Lori Fayhee
District Four

Rafael Lopez
District Five

Jim Ward
District Six

George Zalucki
Vice Mayor
District Seven

Steve Sarkozy
Village Manager

Robert M.
Eschenfelder, Esq.
Village Attorney

August 13, 2026

Via Email Only: Summer.M.Waggeberby@FloridaDEP.gov

Ms. Summer Waggeberby
Florida Department of Environmental Protection
Division of Recreation and Parks/Park Planning
Government Operations Consultant I
3900 Commonwealth Blvd
Tallahassee, FL 32399

Re: Village of Estero Comprehensive Plan and Draft Unit Management Plan for
Koreschan Historic State Park

Dear Ms. Waggeberby:

Staff has reviewed the draft document for the Koreschan Historic State Park as referenced above. The management plan is in compliance with the Village of Estero Comprehensive Plan including, but not limited to, Future Land Use Policies related to Historic and Archeological Resources (FLU-1.6.1, 1.6.2, 1.6.3, and 1.6.4). The conceptual Land Use Plan component is consistent with our Comprehensive Plan as well.

Thank you for the opportunity to review and comment on your draft management plan.

Sincerely,

VILLAGE OF ESTERO
DEPARTMENT OF COMMUNITY DEVELOPMENT

Mary Gibbs, FAICP
Director of Community Development

cc: Meghan Burke – Meghan.Burke@FloridaDEP.gov
Daniel Alsentzer – Daniel.Alsentzer@FloridaDEP.gov
Brandon Dunn – BDunn@leegov.com
Aymee Chavez – Chavez@estero-fl.gov

From: [Jacqueline Genson](#)
To: [Waggerby, Summer M](#); [Burke, Meghan](#)
Cc: [Laura Gibson](#); [Michael Fiigon](#); [Nicole Perino](#); [Sean Gibbons](#); [Permitting](#)
Subject: Re: Lee County Comprehensive Plan and Draft UMP Comparison Review Request
Date: Friday, August 14, 2026 9:31:55 AM
Attachments: [image002.png](#)
[image.png](#)

Good morning, Summer,

Bonita Springs Community Development does not see any inconsistencies with the proposed Lovers Key UMP and the Bonita Springs comprehensive plan at this time. Thanks and have a nice weekend.

Jacqueline Toemmes Genson, AICP
Planning and Zoning Manager
City of Bonita Springs Community Development
9220 Bonita Beach Road, Suite 109
Bonita Springs, FL 34135
jgenson@cityofbonitaspringscd.org
(239) 444-6163
(239) 444-6140 fax
(239) 216-7410 mobile

The zoning information contained within does not constitute an official Zoning Verification Letter and may be subject to changes and may contain errors. The application for an official Zoning Verification Letter can be found here:

https://www.cityofbonitaspringscd.org/forms/Pnz_Zoning_Verification_Letter_20240418_final.pdf

How are we doing? If you have a quick minute, please participate in a brief online Customer Satisfaction Survey. We'd love to hear from you as we value and welcome customer feedback. To participate in the survey, click here: https://www.cityofbonitaspringscd.org/about/customer_satisfaction_survey.html

Florida has a very broad public records law. Most written communications to or from City Employees and officials regarding City business are public records available to the public and media upon request. Your email communication may be subject to public disclosure. Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing.

From: Jacqueline Genson <jgenson@cityofbonitaspringscd.org>
Sent: Friday, August 7, 2026 1:31 PM
To: Summer.M.Waggerby@FloridaDEP.gov <Summer.M.Waggerby@FloridaDEP.gov>;
Meghan.Burke@FloridaDEP.gov <Meghan.Burke@FloridaDEP.gov>
Cc: [Laura Gibson](mailto:LGibson@cityofbonitaspringscd.org) <LGibson@cityofbonitaspringscd.org>; [Michael Fiigon](mailto:mfiigon@cityofbonitaspringscd.org) <mfiigon@cityofbonitaspringscd.org>; [Nicole Perino](mailto:nicole.perino@cityofbonitasprings.org) <nicole.perino@cityofbonitasprings.org>; Sean

From: [Maya Robert](#)
To: [Waggerby, Summer M](#); [Amy L. Yearsley](#)
Cc: [Alsentzer, Daniel](#); [Burke, Meghan](#)
Subject: RE: Lee County Comprehensive Plan and Draft UMP Comparison Review Request
Date: Friday, August 21, 2026 11:39:49 AM
Attachments: [image002.png](#)
[citysig_b1f948c1-2deb-495a-9882-8b605a337185.png](#)
[2026-08-21 Cape Coral ERD Review Documents.pdf](#)

Good morning, Summer,

I apologize for not reaching out earlier. I was on vacation when you first emailed and have been catching up ever since.

If you need an official letter from our city, it will have to be from our Planning Division. Amy Yearsley is the Manager and is copied here.

My team attended your outreach meeting, and I believe we provided public comments then.

Nevertheless, we have reviewed your draft management plan, and I am providing a pdf compiling our review that has 3 parts:

- (i) Additional review comments that do not pertain to the compliance between the state document and the city's comp plan but are critical and involve suggested considerations for both FDEP and our city's Planning Division. Our main concern is the lease term cited as expiring in 2045, but we have others.
- (ii) The written summary of compliance between
- (iii) A table matrix that evaluates every Comp Plan Element against your plan and specific comments, identified based on the level of compliance, and ranked according to the Comp Plan Elements, Policies, and language.

I hope this is helpful,

If you wish to receive the Word documents as well, please reach out to me.

We are conducting a large planning study for the North Cape Coral area for water quality and flooding, let me know if any of your team would like to be involved. The Aquatic Preserve is involved.

Thank you!

Maya

Central Gulf Region

Re: Manatee County Comprehensive Plan and Draft UMP Comparison Review Request

From Elizabeth Shulman <elizabeth.shulman@mymanatee.org>

Date Mon 8/3/2026 1:31 PM

To Trace, Gabrielle <Gabrielle.Trace@FloridaDEP.gov>

Cc Molly White <molly.white@mymanatee.org>; Charlie Hunsicker <charlie.hunsicker@mymanatee.org>; Staci Tippins <staci.tippins@mymanatee.org>; Rachel Layton <rachel.layton@mymanatee.org>; Alsentzer, Daniel <Daniel.Alsentzer@FloridaDEP.gov>; Burke, Meghan <Meghan.Burke@FloridaDEP.gov>; Balkcom, Melisa M <Melisa.M.Balkcom@FloridaDEP.gov>; Groves, Scott <Scott.Groves@FloridaDEP.gov>; OMara, Liam <Liam.OMara@FloridaDEP.gov>

 1 attachment (20 KB)

Terra Ceia Preserve State Park_Manatee County Code Sections.docx;

Gabrielle,

I am writing to confirm that the draft unit management plan is in compliance with the local comprehensive plan.

I am attaching the relevant code sections for reference. The future land use category is conservation, and the zoning district is conservation. Caretaker's residences, visitor information centers, environmental education facilities and development with the primary purpose of protecting the natural resources (such as administrative offices for the preserve) are all permitted within these categories.

Let us know if you have any other questions.

Thanks,

Elizabeth Shulman, AICP | Senior Planner

Manatee County Government

Development Services Department

9000 Town Center Parkway Lakewood Ranch, FL 34202

941-748-4501 ext. 3830

<https://mymanatee.org/departments/development-services-department>

Under [Public Records Act](#) email communications sent to and from this address may be sent to public disclosure. Please be advised that any correspondence may be retained as a public record and could be disclosed upon request.



From: Trace, Gabrielle <Gabrielle.Trace@FloridaDEP.gov>
Sent: Monday, July 27, 2026 3:01 PM
To: Reviewer on Call <revieweroncall@mymanatee.org>; EnvironmentalFieldInspections <environmentalfieldinspections@mymanatee.org>
Cc: Alsentzer, Daniel <Daniel.Alsentzer@FloridaDEP.gov>; Burke, Meghan <Meghan.Burke@FloridaDEP.gov>; Balkcom, Melisa M <Melisa.M.Balkcom@FloridaDEP.gov>; Groves, Scott <Scott.Groves@FloridaDEP.gov>; OMara, Liam <Liam.OMara@FloridaDEP.gov>
Subject: Manatee County Comprehensive Plan and Draft UMP Comparison Review Request

Some people who received this message don't often get email from gabrielle.trace@floridadep.gov. [Learn why this is important](#)

CAUTION: This email originated from an external source.

Be suspicious of Attachments, Links and Request for Login Information and utilize the REPORT MESSAGE Button in Outlook if you feel this is a Phishing email.

Good Afternoon,

The Florida Department of Environmental Protection (DEP), Division of Recreation and Parks (DRP), Office of Park Planning (OPP) are responsible for the unit management planning of all Florida State Parks.

A requirement of part of this planning process is for OPP to obtain written comments regarding the draft unit management plan from the county or city agency that is the authority for the local comprehensive plan. As such, OPP is asking for your office to review the draft management plan for the unit listed below. **The review is being requested to determine if the draft unit management plan is in compliance with the local comprehensive plan. Specifically, we are asking for a review to ensure we are accurately citing the future land use and zoning designations to confirm that our proposed developments in the conceptual land use section of the draft unit management plan is in compliance with those designations. Please also be sure to review the existing facilities section.** Ultimately, we are asking for a written response with a confirmation of compliance and/or any comments, questions or concerns that may need to be addressed.

The documents for the Terra Ceia Preserve State Park draft unit management plan can be accessed at the following link: <https://floridadep.gov/parks/public-participation>

We kindly request that you review the plan and provide a response **no later than August 24, 2026**. If possible, please provide an approximate turn-around time for the review. If this request should be redirected to another person or section, please let us know and we will handle accordingly.

In the meantime, if you need any clarification regarding this request, the draft document or its contents, please contact me or the Office of Park Planning at 850-245-3051. I am the planner for Terra Ceia Preserve State Park unit management plan update and will be able to answer any questions regarding the plan.

Thank you, in advance, for your time, help and direction.

Respectfully,

Gabrielle

Charlotte Harbor Region



Lee County
Southwest Florida

Board of County Commissioners

Kevin Ruane
District One

August 12, 2026

Cecil L. Pendergrass
District Two

David Mulicka
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Donna Marie Collins
County Hearing
Examiner

Summer Waggerby & Meghan Burke
Florida Department of Environmental Protection
Division of Recreation and Parks/Park Planning
3900 Commonwealth Blvd
Tallahassee, FL 32399

**Re: Lee County Comprehensive Plan Consistency:
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Southwest Florida

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Lee County's Department of Community Development appreciates the opportunity to review your updates to these management plans and looks forward to working with your agency in the future.

Sincerely,
Department of Community Development

Brandon Dunn, Planning Manager
Planning Section



August 18, 2026

Summer Waggerby
Florida Department of Environmental Protection
Division of Recreation and Parks/Park Planning
Government Operations Consultant I

RE: Draft UMP Comparison Review for State Parks in Charlotte County

Dear Ms. Waggerby:

The Florida Department of Environmental Protection requested that the Charlotte County Community Development Department review the draft unit management plans for the state parks in Charlotte County for consistency with the Charlotte County Comprehensive Plan. Department staff were requested to review the unit management plans for the following four state parks:

- Charlotte Harbor Region State Parks
- Don Pedro Island State Park
- Stump Pass Beach State Park
- Charlotte Harbor Preserve State Park

Please note that a portion of Charlotte Harbor Preserve State Park is located within the City of Punta Gorda's boundaries. Therefore, the City's Future Land Use Map designations and zoning districts will apply to that portion of the park. The City of Punta Gorda will need to be contacted for comments regarding the portion of the park located within the City's boundaries.

After review, the draft unit management plans for these state parks were found to be in compliance with the Charlotte County Comprehensive Plan. More specifically, the existing uses and proposed conceptual land use plans are not in conflict with the goals, objectives, and policies established in the County's Comprehensive Plan. The proposed land use plans should improve the quality of life of County residents and enhance recreational opportunities.

By restoring habitats, monitoring plant populations, and controlling invasive species, the state park system helps protect our natural resources. The proposed land use plans, which improve

the quality of life and protect our natural resources, are directly consistent with the natural resource goals of the Charlotte County Comprehensive Plan.

Department staff have no further comments or questions regarding this review.

If I can be of further assistance regarding this review, please contact Jie Shao, Principal Planner, at 941.743.1272, or myself at 941.743.1922.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shaun Cullinan', with a stylized flourish at the end.

Shaun Cullinan
Planning And Zoning Official
Charlotte County Board of County Commissioners
941-743-1922
CharlotteCountyFL.gov
Delivering Exceptional Service

From: [Boyd Lawrence, AICP](#)
To: [Waggerby, Summer M](#)
Cc: [Burke, Meghan](#); [Alsentzer, Daniel](#)
Subject: Re: Punta Gorda Comprehensive Plan and Draft UMP Comparison Review Request
Date: Thursday, August 20, 2026 4:32:02 PM
Attachments: [5a4dfaef-cd20-437a-8b06-56ada0544202.png](#)
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Good afternoon,

We have reviewed the DEP Management Plan for Charlotte Harbor Preserve State Park relative to its compliance to the City's Comprehensive Plan.

Our review found no conflicts between the two plans. The City has no objections to the implementation of the Management Plan.

Thank you,
Boyd



Boyd Lawrence, AICP

Planning Director
Urban Design

City of Punta Gorda

126 Harvey St
Punta Gorda Florida 33950
941-575-3414
PuntaGordaFL.gov

Florida has a very broad public records law. Most written communications to City officials regarding City business are public records available to the public and media upon request. Your e-mail communications may be subject to public disclosure.

In accordance with the requirements of Title II of the Americans with Disabilities Act of 1990 ("ADA"), the City of Punta Gorda will not discriminate against qualified individuals with disabilities on the basis of disability in its services, programs, or activities. Reasonable accommodations will be made to ensure that qualified individuals with disabilities have an equal opportunity to enjoy all of the City's services, programs, and activities. Anyone who requires an auxiliary aid or service

for effective accommodation, or a modification of policies or procedures to participate in a service, program, or activity of the City of Punta Gorda should contact the applicable agency at least 4 days prior to the meeting or event.

From: Waggerby, Summer M <Summer.M.Waggerby@FloridaDEP.gov>

Sent: Thursday, August 20, 2026 2:20 PM

To: Boyd Lawrence, AICP <BLawrence@puntagordafl.gov>

Cc: Burke, Meghan <Meghan.Burke@FloridaDEP.gov>; Alsentzer, Daniel <Daniel.Alsentzer@FloridaDEP.gov>

Subject: Punta Gorda Comprehensive Plan and Draft UMP Comparison Review Request

Good afternoon,

The Florida Department of Environmental Protection (DEP), Division of Recreation and Parks (DRP), Office of Park Planning (OPP) are responsible for the unit management planning of all Florida State Parks.

A requirement of part of this planning process is for OPP to obtain written comments regarding the draft unit management plan from the county or city agency that is the authority for the local comprehensive plan. As such, OPP is asking for your office to review the draft management plan for the unit listed below. **The review is being requested to determine if the draft unit management plan is in compliance with the local comprehensive plan. Specifically, we are asking for a review to ensure we are accurately citing the future land use and zoning designations to confirm that our proposed developments in the conceptual land use section of the draft unit management plan is in compliance with those designations. Please also be sure to review the existing facilities section.** Ultimately, we are asking for a written response with a confirmation of compliance and/or any comments, questions or concerns that may need to be addressed.

Charlotte Harbor Region State Parks	Contact Person	Contact Email Address
Charlotte Harbor Preserve State Park	Meghan Burke	FLStateParkPlanning@FloridaDEP.gov

The documents for the draft unit management plans can be accessed at the following link: <https://floridadep.gov/parks/public-participation>

As requested, the planning compliance review letters can be accessed from the following link: <https://floridadep.gov/sites/default/files/1%20-%20Local%20Government%20Comprehensive%20Planning%20Compliance.pdf>

We kindly request that you review the plan and provide a response **no later than August 21, 2026**. If possible, please provide an approximate turn-around time for the review. If this

request should be redirected to another person or section, please let us know and we will handle accordingly.

In the meantime, if you need any clarification regarding this request, the draft document or its contents, please contact me or the Office of Park Planning at 850-245-3051.

Thank you, in advance, for your time, help and direction.



Summer Waggerby

Florida Department of Environmental Protection
Division of Recreation and Parks/Park Planning
Government Operations Consultant I

Summer.M.Waggeberby@FloridaDEP.gov

Office: 850-245-3066



CITY OF CAPE CORAL

August 25, 2026

Summer Waggerby
Government Operations Consultant I
Florida Department of Environmental Protection

SUBJECT: Request for Cape Coral Comprehensive Plan review of Draft UMP for
Charlotte Harbor Preserve

The City of Cape Coral appreciates the opportunity to review the Draft Unit Management Plan for Charlotte Harbor Preserve. Staff reviewed the proposed management plan and found no conflicts between the city's comprehensive plan with the proposed unit management plan.

The City's Environmental Resources Division previously provided some feedback to FDEP which Planning unreservedly endorses. There are a couple of comprehensive plan policies related to the unit management plan which the City Planning Division will clarify or reinforce as part of the Evaluation and Appraisal review of the Plan, which will occur in late 2027.

The City Planning Division again appreciates the opportunity to review the UMP. If you have further questions or would like to reach out to me, please contact me at 573-3182.

Sincerely,

Amy Yearsley, AICP
City Planning Manager

AY/WD

c: Maya Robert, Environmental Resources Manager

City of Cape Coral Environmental Resources Division

additional review outside of compliance request

Charlotte Harbor Preserve State Park – Draft Management Plan

City of Cape Coral Environmental Resources Division (ERD) • Comments for State DEP and City of Cape Coral
Planning Division Coordination • August 2026

Purpose	Provide ERD’s technical and policy comments in a format that can be used both for City coordination with the Planning Division and for formal comments to DEP.
Relationship to Comp Plan Review	ERD identifies which concerns should remain in the Comprehensive Plan consistency review and which are primarily State management-plan recommendations with a Comprehensive Plan nexus.
Review Limitation	ERD is not providing a legal interpretation of the State land leases. Lease disposition/renewal should be confirmed from the executed lease instruments and applicable State land-management procedures.

Purpose and Executive Summary

The Environmental Resources Division (ERD) reviewed the Charlotte Harbor Preserve State Park Draft Management Plan for consistency with the City of Cape Coral Comprehensive Plan and for technical/resource-management issues that may warrant City comment, even when they are not direct Comprehensive Plan compliance matters. This document is intended to support two audiences: (1) DEP, as suggested revisions or clarifications to the State Management Plan; and (2) City Planning Division colleagues, to identify where ERD believes the issues should be reflected in the City's Comprehensive Plan consistency review or otherwise considered in intergovernmental coordination.

ERD recommends retaining all four concerns identified below in the City's review package. Three have a clear Comprehensive Plan nexus and should remain visible in the compliance matrix. The invasive-reptile concern is primarily a resource-management implementation issue, but it also relates to the broader Comprehensive Plan objectives for ecological-community and listed-species protection. The most consequential issue is long-term management continuity: the draft states that Lease No. 4085 ends June 22, 2045, while also defining the preserve as a 45,507-acre natural buffer protecting five aquatic preserves. ERD is not concluding that conservation status ends in 2045; rather, ERD recommends that the State clarify the lease-renewal or successor-management process and that Planning retain this issue as a long-range consistency and coordination concern.

ERD Comment Tracking Summary

ERD Issue	Recommended Comp Plan Treatment	Priority	Primary Plan Connection	ERD Requested State Action
Lease / management continuity	Retain – Partial; frame as long-range coordination/implementation gap	High	Future Land Use Policy 1.2; Conservation state-preservation coordination	Document renewal/continuity path and schedule well before lease expiration.
Nile monitor / invasive reptiles	Retain – Partial; note primarily resource-management	Medium-High	Conservation Goal 1 / Objective 1.2	Add measurable surveillance, trapping/removal and adaptive control framework.
NW Cape sheet flow / drainage	Retain – Partial	High	Infrastructure Goal 3; Conservation Goal 6; Intergovernmental Coordination	Coordinate State hydrologic work with City drainage studies/data and identify City as technical partner.
Smalltooth sawfish habitat	Retain – Partial	High	Conservation Objective 1.2; listed-species coordination policies	Add species-specific monitoring/data-sharing and habitat-protection action for Cape Coral interface.

1. Lease expiration and continuity of conservation management

ERD assessment: Comprehensive Plan-related / High priority

State Plan Context

The draft identifies Lease No. 4085 as ending June 22, 2045 and describes Lease No. 4134 as a 50-year management agreement. The plan also states that the preserve functions as a natural buffer protecting five surrounding aquatic preserves. The draft does not explain the intended management or conservation status after the lease terms, nor does it provide a schedule for renewal, replacement, reassignment, or other continuity action.

ERD Comment for Planning Division

ERD recommends that this issue remain in the Comprehensive Plan consistency review. Future Land Use Policy 1.2 calls for protection of State-owned preservation lands, and Conservation/Coastal Management policies emphasize cooperation with State agencies to maintain natural reservations and protect Matlacha Pass/Charlotte Harbor resources. This plays an essential part in the City's Community Rating System (CRS) and residents' flood insurance premiums. Planning may wish to characterize this as a long-range coordination and implementation gap rather than a present inconsistency.

ERD Recommended Comment to DEP

ERD recommends that DEP add a long-term land-tenure and management-continuity discussion identifying the expiration dates and renewal/extension process for both leases, responsible agencies, a target schedule for initiating review well before expiration, and how uninterrupted conservation management and the preserve's water-quality buffer function will be assured. ERD also recommends clarifying that the absence of a stated legislative or executive directive is not intended to signal a change in conservation purpose.

2. Nile monitor and other invasive exotic reptiles

ERD assessment: Resource-management concern with Comprehensive Plan nexus / Medium-High priority

State Plan Context

The draft identifies Nile monitors as one of the preserve's most serious animal threats and notes an active University of Tampa research project intended to eradicate them. However, the formal invasive/nuisance animal objective and action list is focused on feral hog trapping, annual hog removal goals, and USDA funding. The draft does not establish a measurable park-level Nile monitor control objective, monitoring frequency, response threshold, or long-term control/eradication protocol.

ERD Comment for Planning Division

ERD considers this primarily a State management-plan implementation issue. However, the City Comprehensive Plan strongly supports protection of ecological communities and listed species. Although the explicit invasive-species control policy is written for invasive exotic pest plants, the broader habitat and listed-species protection objectives provide a reasonable Comprehensive Plan nexus. Planning may retain the existing Partial finding, while noting that the requested correction is principally technical/resource-management in nature.

ERD Recommended Comment to DEP

ERD recommends retaining the existing research partnership while adding a formal invasive-reptile management action that identifies coordinated surveillance, reporting, trapping/removal protocols, priority target areas in the Cape Coral Management Area, responsible partners, annual performance measures, and an adaptive response if Nile monitors or other high-risk reptiles expand. Coordination with FWC and other qualified agencies should be identified.

3. Northwest Cape Coral sheet flow, flooding and drainage planning

ERD assessment: Comprehensive Plan-related implementation issue / High priority

State Plan Context

The draft documents increasing freshwater sheet flow from adjacent development, freshwater flooding observed during Hurricane Milton, and the need to coordinate hydrologic restoration with water management districts and local governments so restoration does not worsen upstream flooding. It also identifies ongoing assessments involving Yucca Pen Creek, Durden Creek, Greenwell Branch, Longview Run, and Gator Slough in northwest Cape Coral.

ERD Comment for Planning Division

ERD recommends that this issue remain in the compliance matrix because it directly relates to the City's stormwater, flooding, receiving-water protection, and intergovernmental coordination policies. The Northwest Cape Coral drainage/stormwater studies themselves are not Comprehensive Plan policies; however, they are important implementation information that can help the City and State coordinate hydrologic modeling, restoration assumptions, and project sequencing.

ERD Recommended Comment to DEP

ERD recommends that the final State Plan explicitly commit to coordination with the City on current and future Northwest Cape Coral drainage/stormwater studies and datasets, including shared assumptions, boundary conditions, existing and proposed conveyance, flood elevations, water-quality objectives, and project sequencing. The City should be identified as a formal technical coordination partner for Cape Coral Management Area hydrologic restoration.

4. Smalltooth sawfish critical habitat and local survey coordination

ERD assessment: Resource-management concern with direct listed-species policy nexus / High priority

State Plan Context

The draft recognizes federally endangered smalltooth sawfish and identifies red-mangrove shorelines and shallow waters under 3 feet MLLW in Charlotte Harbor as critical habitat. It describes general wildlife surveys and habitat protection but does not establish a sawfish-specific monitoring or coordination action for the Cape Coral interface.

ERD Comment for Planning Division

ERD recommends retaining a Partial finding in the compliance matrix because this issue directly relates to City policies for monitoring ecological communities and endangered/rare species, protecting listed-species habitat, and coordinating with FWC/USFWS and other agencies. Planning may wish to note that ERD's concern is not that the State Plan fails to recognize sawfish habitat, but that the plan could better connect that recognition to measurable monitoring and local data-sharing actions in the Cape Coral interface.

ERD Recommended Comment to DEP

ERD recommends adding a sawfish-specific coordination action for the Cape Coral Management Area. DEP should review and, where technically appropriate, incorporate existing or future sawfish observations/surveys from Glover Bight and Cape Coral canals; coordinate with the appropriate federal and State species agencies; identify priority red-mangrove/shallow-water habitat; and specify how hydrologic, access, shoreline, or restoration actions will avoid or minimize impacts to critical habitat.

Source Notes and Internal Coordination Context

Lease and buffer purpose: Draft Management Plan, Introduction / Location and Acquisition History. ERD recommends Planning retain this as a long-range consistency/coordination issue and DEP clarify the continuity process.

Schwarcom parcel: Draft Management Plan, Optimum Boundary. The early-2000s lease amendment adding approximately 32 acres of flatwoods and the proposed reassignment discussion reinforce ERD's recommendation that future lease/management actions be described before the current planning cycle closes.

Invasive animals: Draft Management Plan, Invasive Species. ERD supports the feral hog program and recommends a more explicit, measurable Nile monitor/invasive-reptile action framework.

Hydrology / Northwest Cape Coral: Draft Management Plan, Hydrology. ERD recommends direct technical coordination between DEP and City staff so State restoration work and City drainage planning use compatible data and assumptions.

Sawfish: Draft Management Plan, Imperiled Species. ERD recommends connecting the State plan's critical-habitat discussion to Cape Coral-area observations/surveys and agency coordination where technically appropriate.

Summary Consistency Review

Charlotte Harbor Preserve State Park Draft Management Plan vs. City of Cape Coral Comprehensive Plan

State Plan Reviewed	Charlotte Harbor Preserve State Park – Draft Management Plan
Local Plan Reviewed	City of Cape Coral Comprehensive Plan – Goals, Objectives, and Policies
Review Date	August 2026
Review Type	Executive planning-consistency review; not a legal opinion

Determination

Overall finding: The Charlotte Harbor Preserve State Park Draft Management Plan is generally consistent with and supportive of the major applicable goals, objectives, and policies of the City of Cape Coral Comprehensive Plan. No clear direct policy conflict was identified in the reviewed Comprehensive Plan elements. The strongest areas of alignment are natural-resource protection, estuarine and wetland conservation, hydrologic restoration, imperiled-species management, invasive-species control, passive recreation, cultural-resource protection, and intergovernmental coordination.

The principal opportunities for improvement are documentation and implementation details rather than changes to the preserve's fundamental management direction. In particular, the draft State Plan would benefit from a more explicit Cape Coral consistency statement, a formalized monitoring/data-sharing framework for the Chiquita Lock and Ceitus/Spreader Waterway interfaces, clearer sea-level-rise and coastal-resilience criteria, and more explicit coordination for North Cape Flats access improvements and future projects affecting City infrastructure or adjacent properties.

1. Basis and Scope of Review

The review compares the State Plan's stated purpose, resource-management objectives, management actions, and conceptual land-use proposals with the City's adopted goals, objectives, and policies. Particular attention was given to provisions that materially intersect with State preserve management in Cape Coral: Conservation and Coastal Management, Future Land Use, Intergovernmental Coordination, Recreation and Open Space, Infrastructure, and Capital Improvements. Transportation, Economic Development, Property Rights, and Housing were reviewed for potential conflicts or ancillary consistency issues.

The State Plan describes a 45,507-acre preserve whose primary function is to buffer and protect Charlotte Harbor and five surrounding aquatic preserves while providing passive resource-based recreation. The Cape Coral Management Area extends along the Harbor and Matlacha Pass interface and includes mangrove swamp, salt marsh, mesic flatwoods, canals/creeks, public access points, and hydrologic connections influenced by the City's spreader waterways.

2. Major Areas of Compliance and Consistency

Natural-resource and wetland protection: The City Comprehensive Plan calls for preservation, protection and enhancement of natural resources, estuarine waters, wetlands, listed-species habitat and State-owned preservation lands. The State Plan's preserve classification, conservation-first purpose, mangrove/salt-marsh management, prescribed fire, invasive-species control, imperiled-species monitoring and hydrologic restoration strongly support these policies.

Water quality, hydrology and spreader-waterway interface: The City Plan emphasizes estuarine water quality, stormwater impacts, spreader-waterway performance and protection of Matlacha Pass/Charlotte Harbor. The State Plan identifies impaired waters, altered hydrology, stormwater inputs, salinity/nutrient/turbidity concerns, and the need for hydrologic studies and water-budget models. It directly addresses the Ceitus boat lift and Chiquita Lock removals and calls for continued work with Cape Coral and other partners.

Intergovernmental coordination: Both plans recognize that Charlotte Harbor, Matlacha Pass, estuaries, hydrologic systems and natural communities cross jurisdictional boundaries. The State Plan repeatedly calls for coordination with Cape Coral, Lee County, DEP, SFWMD, FWC, research partners and other stakeholders. This directly advances the City's Intergovernmental Coordination and Conservation/Coastal Management policies.

Imperiled species and invasive-species management: The State Plan inventories and monitors imperiled species, including Cape Coral-area occurrences, and includes recovery-oriented habitat management. It also establishes extensive survey, early-detection, treatment and follow-up programs for invasive plants and feral hogs, consistent with City policies for habitat and listed-species protection.

Passive recreation and public access: The City’s policies support public access and open space while protecting coastal resources. The State Plan gives natural-resource conditions priority over user considerations, limits development to the minimum necessary, and provides passive access through the North Cape Flats Trailhead and trail system. This is consistent with the City’s conservation-oriented recreation framework.

Cultural resources: The State Plan contains archaeological inventories, site-condition assessment, monitoring, pre-project survey requirements, preservation measures and anti-looting actions, aligning with City policies that call for protection of historic and archaeological resources in coordination with State/Federal agencies.

3. Key Gaps / Partial-Consistency Issues

1. Water-quality monitoring is recognized but not fully institutionalized at the park level. The State Plan states that the park does not itself conduct water-quality sampling and instead relies on DEP Aquatic Preserves and partner networks. This is not a conflict, but it leaves the Cape Coral interface dependent on external programs. A formal data-sharing and monitoring protocol would better support City policies calling for ongoing assessment of estuarine conditions.

2. Sea-level rise and climate resilience are not explicit enough. The State Plan documents king tides, storm surge, hurricane erosion, flooding and increasingly extreme wet/dry conditions. The City Comprehensive Plan expressly requires consideration of climate change and sea-level rise. The State Plan should translate observed conditions into explicit resilience assumptions, thresholds and adaptation strategies.

3. Chiquita/Ceitus monitoring needs measurable implementation criteria. The State Plan appropriately calls for continued coordination and monitoring, but the language would be stronger if it identified parameters, responsible entities, data-sharing frequency, evaluation thresholds, and how monitoring results would trigger restoration or adaptive-management actions.

4. North Cape Flats improvements need a clearer City coordination pathway. The conceptual plan proposes improvements to the North Cape Flats trailhead/parking. This is generally consistent with recreation and open-space policies, but project-level coordination should address access, drainage, flood exposure, wayfinding, visitor impacts and any applicable local permits or service impacts.

5. Optimum-boundary language should acknowledge private-property protections. The State Plan identifies inholdings and larger parcels for possible acquisition. Because the City’s Property Rights Element requires consideration of private rights, the State Plan should clarify that optimum-boundary designation itself does not alter private property rights and that acquisition follows applicable voluntary/statutory procedures.

4. Recommended State Plan Improvements

Priority	Recommended Improvement	Rationale
High	Add a dedicated “Consistency with Local Comprehensive Plans” subsection for the Cape Coral Management Area, citing the City’s Conservation and Coastal Management, Future Land Use, Intergovernmental Coordination, Recreation/Open Space, Infrastructure and Capital Improvements policies.	Addresses the most material cross-jurisdictional consistency and implementation issues.
High	For Chiquita Lock and Ceitus/Spreader Waterway effects, establish a joint monitoring framework that identifies parameters (e.g., salinity, nutrients, turbidity, water levels/flows, erosion and mangrove condition), responsible partners, data-sharing cadence, reporting intervals and adaptive-management triggers.	Addresses the most material cross-jurisdictional consistency and implementation issues.

Priority	Recommended Improvement	Rationale
High	Add explicit sea-level-rise and coastal-resilience considerations for restoration, trailheads, parking, low-water crossings and other infrastructure. Tie design/maintenance decisions to high-tide, storm-surge, rainfall/flooding and long-term sea-level scenarios.	Addresses the most material cross-jurisdictional consistency and implementation issues.
Medium	Include North Cape Flats in the interpretive-sign/visitor-management framework and identify coordination with the City for safe access, parking, drainage, wayfinding and protection of adjacent sensitive resources.	Improves implementation clarity and local coordination.
Medium	For projects that could affect City drainage, canals, flood levels, utilities, road access or emergency functions, add a project-level coordination checkpoint before design and implementation.	Improves implementation clarity and local coordination.
Medium	Add a brief private-property statement to the Optimum Boundary section clarifying that boundary recommendations are planning concepts and that any acquisition will respect applicable ownership rights and acquisition procedures.	Improves implementation clarity and local coordination.
Low	Cross-reference relevant City and regional water-quality, resilience and Charlotte Harbor planning documents in the bibliography or partnership discussion to make consistency traceable over the 10-year management horizon.	Improves traceability and long-term planning integration.

5. Conclusion

On the basis of the supplied documents, the State Park draft is substantively aligned with the City of Cape Coral Comprehensive Plan's environmental and intergovernmental direction. The plan's conservation-first management model, hydrologic restoration program, listed-species and invasive-species management, and explicit Cape Coral coordination on the Chiquita and Ceitus interfaces are particularly strong. The identified partial-consistency items do not presently appear to be fundamental conflicts; they are principally opportunities to make local-plan consistency, monitoring responsibilities, climate resilience, public-access coordination and property-rights safeguards more explicit and auditable.

6. Source Documents Reviewed

State Plan: Charlotte Harbor Preserve State Park - draft management plan.pdf

Conservation and Coastal Management: Exhibit B Chapter 2 CONSERVATION AND COASTAL MANAGEMENT 020123version.pdf

Future Land Use: Chapter 4 Future Land Use Element GOP.pdf

Intergovernmental Coordination: Exhibit F Chapter 6 Intergovernmental Coordination Element 020123version.pdf

Recreation and Open Space: Exhibit G Chapter 7 Recreation and Open Space Element 020123version.pdf

Infrastructure: Exhibit E Chapter 5 Infrastructure Element GOP 012626version.pdf

Capital Improvements: Exhibit A Chapter 1 Capital Improvement Element 020123version.pdf

Transportation: Exhibit H Chapter 8 Transportation Element 020123version.pdf

Economic Development: Exhibit I Chapter 9 ECONOMIC DEVELOPMENT ELEMENT 020123version.pdf

Property Rights: Chapter 11_PROPERTY RIGHTS ELEMENT_120121.pdf

Housing: Exhibit C Chapter 3 Housing Element GOP 020123version.pdf

Comprehensive Plan Consistency Matrix

Charlotte Harbor Preserve State Park Draft Management Plan vs. City of Cape Coral Comprehensive Plan

Rating key:

- Yes = substantively consistent/supportive;
- Partial = generally aligned but documentation, implementation detail, or scope is incomplete;
- No = direct inconsistency identified;
- N/A = policy is not materially applicable to the State Preserve Management Plan. The matrix is a planning review, not a legal opinion.

References use PDF page numbers from the supplied files. State Plan references identify the relevant section and PDF page. Where a Comprehensive Plan policy is directed to City actions rather than State land management, the rating reflects whether the State Plan creates a consistency issue rather than whether DEP performs the City's duty.

Matrix Summary

Reviewed entries: 50. Yes: 34 • Partial: 13 • No: 0 • N/A: 3. No direct Comprehensive Plan conflict was identified. The added Partial findings address long-term lease/management continuity, Northwest Cape Coral hydrologic coordination, Nile monitor control planning, and smalltooth sawfish monitoring/data-sharing.

Supplemental note: Four City review concerns were incorporated after the initial matrix was prepared. These additions do not change the overall consistency conclusion, but they identify important long-term and implementation issues that should be resolved or clarified in the final State Management Plan.

Comp Plan Element	Section / Policy Ref.	Requirement / Intent	State Management Plan Ref.	Compliance	Explanation / Basis	Suggested Improvement
Chapter 2 - Conservation and Coastal Management	Goal 1 / Obj. 1.1 (PDF p. 1)	Preserve, protect and enhance natural resources; maintain/improve estuarine water quality and prevent degradation of adjacent waters.	Introduction – Park Purpose (PDF p. 12)	Yes	The preserve's core purpose is conservation and buffering of Charlotte Harbor/aquatic preserves. This is strongly consistent with the City goal.	—
Chapter 2 - Conservation and Coastal Management	Goal 1 / Objective 1.2	Protect natural communities, flora/fauna and listed-species habitat.	Invasive Species – Nile monitor / nuisance animal control	Partial	The draft identifies Nile monitors as a serious threat and supports an eradication research project, but the formal nuisance-animal objective/actions are centered on feral hogs and lack measurable Nile monitor control targets.	Add a formal invasive-reptile surveillance and control action with partners, target areas, reporting, removal protocols, annual measures and adaptive triggers.

Comp Plan Element	Section / Policy Ref.	Requirement / Intent	State Management Plan Ref.	Compliance	Explanation / Basis	Suggested Improvement
Chapter 2 - Conservation and Coastal Management	Policy 1.1.1 (PDF p. 1)	Improve estuarine environmental quality through habitat restoration and public education.	Resource Management – Hydrology / Restoration (PDF p. 6)	Yes	The State Plan includes major wetland/fish-nursery restoration and habitat restoration actions. Public interpretation is also addressed in the land-use component.	—
Chapter 2 - Conservation and Coastal Management	Policy 1.1.2 (PDF p. 1)	Continue surface-water quality monitoring to identify problems and evaluate effectiveness of measures.	Hydrology – Water Quality (PDF p. 32)	Partial	The State Plan recognizes impaired waters and relies on DEP Aquatic Preserves/partner monitoring, but the park itself does not sample.	Add CHNEP coordination/ State/ Cape Coral-area monitoring/data-sharing framework with measurable indicators for Chiquita/Ceitus-related effects.
Chapter 2 - Conservation and Coastal Management	Policy 1.1.6 (PDF p. 1)	Minimize stormwater runoff impacts on estuarine water quality through comprehensive stormwater management.	Hydrology – Monitoring and Assessment (PDF p. 35)	Yes	The State Plan identifies upstream stormwater as a hydrologic/water-quality driver and calls for hydrologic studies, water budgets and coordination with local governments.	—
Chapter 2 - Conservation and Coastal Management	Policy 1.1.8 (PDF p. 2)	Cooperatively investigate spreader-waterway effectiveness and improvements affecting Matlacha Pass.	Hydrology – Ceitus / Spreader Waterway (PDF p. 36)	Yes	Direct alignment. The State Plan identifies spreader-waterway breaches, Ceitus removal, water-quality concerns and continuing coordination with Cape Coral, DEP, Lee County and stakeholders.	—
Chapter 2 - Conservation and Coastal Management	Objective 1.2 (PDF p. 3)	Monitor ecological communities and flora/fauna, especially endangered and rare species, and protect habitats.	Imperiled Species (PDF p. 61)	Yes	The State Plan contains community inventories, imperiled-species inventories and monitoring protocols, including Cape Coral populations of beautiful pawpaw and bonneted bat.	—

Comp Plan Element	Section / Policy Ref.	Requirement / Intent	State Management Plan Ref.	Compliance	Explanation / Basis	Suggested Improvement
Chapter 2 - Conservation and Coastal Management	Objective 1.2 / Policies 1.2.5, 1.7.8	Monitor/protect ecological communities and listed species; coordinate with wildlife agencies.	Imperiled Species – Smalltooth sawfish critical habitat (State Plan, Imperiled Species section)	Partial	The draft recognizes sawfish critical habitat in red-mangrove shorelines and waters <3 ft MLLW, but does not identify a sawfish-specific monitoring/data-sharing action for the Cape Coral interface.	Coordinate with appropriate State/federal species agencies and incorporate relevant Glover Bight/Cape Coral canal survey or observation data where technically appropriate; define habitat-monitoring and avoidance measures.
Chapter 2 - Conservation and Coastal Management	Policy 1.2.5 (PDF p. 3)	Assist implementation of state/federal listed-species protections.	Imperiled Species – Objectives and Actions (PDF p. 7)	Yes	State management is explicitly structured around imperiled species and federal/state recovery or monitoring protocols.	—
Chapter 2 - Conservation and Coastal Management	Policies 1.2.8 & 1.2.18 (PDF p. 4)	Control invasive exotic plants and restore/enhance degraded natural areas, including natural hydrology.	Invasive Species / Natural Community Restoration (PDF p. 7)	Yes	The State Plan has extensive invasive-species survey/treatment actions, early detection/rapid response, hydrologic restoration, prescribed fire and native-community restoration.	—
Chapter 2 - Conservation and Coastal Management	Objective 1.5 / Policy 1.5.2 (PDF p. 7)	Improve surface water and conserve/protect wetlands consistent with FDEP/SFWMD standards.	Natural Communities – Mangrove Swamp / Salt Marsh (PDF p. 52)	Yes	The State Plan prioritizes mangrove/salt-marsh conservation, hydrologic restoration, invasive control and protection of wetland function.	—
Chapter 2 - Conservation and Coastal Management	Policy 1.6.1 (PDF p. 8)	Maintain design and function of canal structures and take corrective measures as needed.	Hydrology – Chiquita/Ceitus Monitoring (PDF p. 6)	Partial	The policy is directed to City-owned structures. The State Plan does not maintain City canal structures, but it expressly addresses effects of the Chiquita and Ceitus removals.	Clarify roles and trigger points for corrective/restoration actions affecting preserve lands.

Comp Plan Element	Section / Policy Ref.	Requirement / Intent	State Management Plan Ref.	Compliance	Explanation / Basis	Suggested Improvement
Chapter 2 - Conservation and Coastal Management	Policy 1.7.12 (PDF p. 9)	Cooperate with State/Federal government to maintain natural reservations in State-owned preservation areas.	Purpose / Internal Classification (PDF p. 12)	Yes	The State Plan is itself a State-preserve management framework and gives resource protection priority over user considerations.	—
Chapter 2 - Conservation and Coastal Management	Policy 1.7.14 (PDF p. 9)	Coordinate management of cross-boundary bays, estuaries, harbors and unique vegetative communities.	Hydrology – Monitoring and Assessment (PDF p. 35)	Yes	Strong alignment. The plan repeatedly requires or recommends local/state coordination on hydrology and cross-boundary environmental issues.	—
Chapter 2 - Conservation and Coastal Management	Policy 1.7.16 (PDF p. 10)	Protect the Matlacha Pass Preservation Area; limit development except compatible public access.	Land Use – Recreational Infrastructure (PDF p. 117)	Yes	The State Plan’s preserve classification and minimal-development standard are consistent with this protective direction.	—
Chapter 2 - Conservation and Coastal Management	Policy 1.7.18 (PDF p. 10)	Discourage destruction of natural systems by off-road recreational vehicles.	Land Use – Catfish Creek / Visitor Use (PDF p. 118)	Yes	The State Plan recognizes impacts from unauthorized motorized use and manages access with resource protection as the priority.	—
Chapter 2 - Conservation and Coastal Management	Objective 1.8 / Policy 1.8.2 (PDF p. 10)	Increase public awareness through education, interpretive displays and trails.	Conceptual Land Use – Interpretation (PDF p. 117)	Yes	The State Plan includes interpretive kiosks and a parkwide objective to improve orientation and interpretation.	Include North Cape Flats explicitly in the interpretive sign plan for stronger Cape Coral linkage.
Chapter 2 - Conservation and Coastal Management	Goal 2 / Policy 2.1.3 (PDF p. 12)	Maintain/increase coastal access without damaging coastal natural resources.	Cape Coral Management Area – North Cape Flats Trailhead (PDF p. 8)	Yes	The plan provides passive access while explicitly subordinating development to resource protection. Improvements should retain visitor-impact monitoring and avoidance criteria.	—

Comp Plan Element	Section / Policy Ref.	Requirement / Intent	State Management Plan Ref.	Compliance	Explanation / Basis	Suggested Improvement
Chapter 2 - Conservation and Coastal Management	Goal 3 / Policy 3.1.1 (PDF p. 12)	Protect historic/archaeological resources in cooperation with federal and state agencies.	Cultural Resources – Condition Assessment (PDF p. 105)	Yes	The State Plan inventories cultural sites, calls for archaeological surveys before major work, monitoring, preservation and anti-looting measures.	—
Chapter 2 - Conservation and Coastal Management	Policy 4.5.5 (PDF p. 17)	Use strategies/engineering solutions to reduce coastal flood risk from high tide, surge, runoff and sea-level rise.	Hydrology – Water Quantity / Coastal Erosion (PDF p. 31)	Partial	The State Plan addresses king tides, storm surge, hurricanes, flooding and erosion but does not clearly establish a sea-level-rise adaptation/resilience framework.	Add explicit climate/SLR assumptions and adaptation criteria for Cape Coral-area facilities and restoration.
Chapter 2 - Conservation and Coastal Management	Goal 6 / Policies 6.1.1–6.1.3 (PDF p. 17)	Use intergovernmental coordination for system-wide environmental/coastal resource management and Charlotte Harbor/spreader issues.	Hydrology – Interagency Coordination (PDF p. 6)	Yes	This is one of the strongest areas of consistency. The State Plan identifies Cape Coral, DEP, Lee County, SFWMD and other partners in monitoring and restoration coordination.	—
Chapter 3 - Housing	Element-wide (PDF p. 1)	Provide housing opportunities, affordability, quality, special needs and related infrastructure.	Introduction – Preserve Purpose (PDF p. 11)	N/A	The State Preserve Management Plan does not propose residential development or housing programs in Cape Coral. No direct consistency issue identified.	—
Chapter 4 - Future Land Use	Policy 1.1 (PDF p. 1)	Consider climate change and sea-level rise in future land-use decisions.	Hydrology – Coastal Conditions (PDF p. 31)	Partial	The State Plan recognizes climate-related stressors and extreme events but does not explicitly tie management decisions to sea-level-rise scenarios.	Add a resilience/SLR subsection and adaptive-management triggers.

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Chapter 4 - Future Land Use	Goal / Policy 1.2 (PDF p. 1)	Protect public investment and natural resources; regulate land/water to protect State-owned preservation lands, canals, Caloosahatchee River and Charlotte Harbor.	Introduction – Purpose and Significance (PDF p. 11)	Yes	The State Plan directly advances protection of State-owned preservation lands and the Charlotte Harbor system.	—
Chapter 4 - Future Land Use	Policy 1.2 (PDF p. 1)	Protect State-owned preservation lands and waters of Charlotte Harbor.	Introduction – Leases 4085/4134 and preserve buffer purpose (State Plan PDF p. 1)	Partial	The draft establishes a conservation purpose and long-term preserve role, but it does not explain how management continuity will be assured when the existing management leases expire.	Add lease-expiration dates, renewal/extension or reassignment process, responsible agencies, milestones, and an explicit commitment to uninterrupted conservation/buffer management.
Chapter 4 - Future Land Use	Policy 1.3 (PDF p. 1)	Regulate flood-prone areas and provide drainage/stormwater management.	Hydrology – Restoration Coordination (PDF p. 35)	Yes	The State Plan explicitly considers flooding, stormwater and off-site effects when planning hydrologic restoration.	—
Chapter 4 - Future Land Use	Policy 1.11 (PDF p. 3)	Encourage acquisition/assembly of land for public uses.	Optimum Boundary (PDF p. 128)	Yes	The State Plan identifies inholdings and larger parcels whose acquisition would improve preserve integrity and buffering.	—
Chapter 4 - Future Land Use	Policy 9.2 (PDF p. 28)	Use climate-resiliency strategy and other studies to plan for climate impacts.	Imperiled Species / Coastal Conditions (PDF p. 70)	Partial	Storm-event vulnerability is discussed, but the State Plan would be more consistent if it referenced local/regional resilience studies or incorporated comparable sea-level/flood planning assumptions.	—
Chapter 4 - Future Land Use	Policy 11.2 (PDF p. 29)	Use inland dredge-spoil sites to protect marine and estuarine resources.	Natural Communities – Spoil Area (PDF p. 56)	N/A	This is a City operational policy. The State Plan addresses existing spoil areas and restoration/invasive management but does not establish City dredge-spoil siting policy.	—

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Chapter 4 - Future Land Use	Policies 12.1–12.2 (PDF p. 29)	Coordinate land-use planning and cooperate with State/Federal agencies on natural-resource issues.	Hydrology / Resource Management Coordination (PDF p. 6)	Yes	The State Plan is built around interagency research, management and restoration coordination.	—
Chapter 5 - Transportation	Goal 1 (PDF p. 1)	Transportation should be safe, balanced and consistent with future-land-use and environmental goals.	Cape Coral Management Area – Trailhead Parking (PDF p. 8)	Partial	No major transportation project is proposed in Cape Coral, but trailhead parking expansion should be coordinated for safe access, drainage and environmental compatibility.	—
Chapter 5 - Transportation	Non-motorized transportation objectives (PDF p. 1)	Support safe non-motorized travel and pedestrian/bicycle connections where appropriate.	Cape Coral Management Area – Existing Trail (PDF p. 8)	Yes	The preserve provides hiking access and passive recreation. Any connection to City bicycle/pedestrian networks should be coordinated separately.	—
Chapter 6 - Intergovernmental Coordination	Goal / Objective 1 (PDF p. 1)	Maximize coordination with other governments/agencies through staff interaction, agreements, written communication and public meetings.	Hydrology – Coordination (PDF p. 6)	Yes	The State Plan repeatedly identifies joint work with Cape Coral and other agencies; this is consistent with the City’s coordination framework.	—
Chapter 6 - Intergovernmental Coordination	Policy 1.4 (PDF p. 1)	Coordinate management of bays, estuaries and harbors crossing City borders, including DEP/CHNEP.	Water Quality / Partner Monitoring (PDF p. 32)	Yes	The State Plan relies on DEP/CHNEP-related monitoring and calls for coordination on cross-boundary hydrologic issues.	Need to specifically call out the Coastal Heartland National Estuary Partnership (CHNEP) work in coordinating sampling with state and local government partners, including the City of Cape Coral. Water Atlas data repository.

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Chapter 6 - Intergovernmental Coordination	Objective 2 / Policy 2.1 (PDF p. 2)	Coordinate impacts with local, regional and State agencies.	Ceitus / Chiquita Coordination (PDF p. 32)	Yes	The State Plan explicitly identifies these parties and recommends continued collaborative monitoring and restoration evaluation.	—
Chapter 6 - Intergovernmental Coordination	Objective 3 / Policy 3.1 (PDF p. 3)	Coordinate level-of-service standards with other governmental entities.	Cape Coral Management Area – Trailhead (PDF p. 8)	N/A	The State Plan does not establish City LOS standards.	Any future Cape Coral trailhead expansion should be coordinated with City transportation/public-service capacity as applicable.
Chapter 7 - Infrastructure	Policy 2.2.1 – Chiquita Lock Project (PDF p. 4)	City short-term infrastructure program identifies the Chiquita Lock Project.	Hydrology – Chiquita Lock (PDF p. 36)	Yes	The State Plan documents the removal and calls for joint monitoring/quantification of impacts and identification of beneficial restoration actions.	—
Chapter 7 - Infrastructure	Goal 3 (PDF p. 7)	Provide adequate stormwater drainage while preventing degradation of receiving waters.	Hydrology – Spreader Waterways (PDF p. 32)	Yes	The State Plan identifies the receiving-water consequences of altered canal/spreader discharges and supports monitoring/restoration.	—
Chapter 7 - Infrastructure (cross-reference: Chapter 6 - Intergovernmental Coordination)	Infrastructure Goal 3; Conservation Goal 6; IGC Policy 1.4	Prevent receiving-water degradation and flooding; coordinate cross-boundary hydrologic/resource management.	Hydrology – sheet flow, upstream flooding, Yucca Pen/Gator Slough assessments	Partial	The draft correctly identifies increased freshwater sheet flow, flooding risk and the need for local-government coordination. The City’s northwest drainage/stormwater work should be explicitly integrated at implementation level.	Coordinate State hydrologic models/restoration with City northwest drainage/stormwater studies and data; document shared assumptions, flood/water-quality objectives, sequencing and recurring technical coordination.
Chapter 7 - Infrastructure	Policy 3.1.5 (PDF p. 8)	Prioritize correction of stormwater deficiencies based on flooding or pollutant loading.	Hydrology – Monitoring and Assessment (PDF p. 35)	Yes	The State Plan identifies water quantity/quality, altered conveyance and flooding as restoration drivers.	A shared priority list for Cape Coral interface areas would improve implementation.

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Chapter 7 - Infrastructure	Policy 4.1.2 (PDF p. 8)	Coordinate with federal/state/local agencies on regional aquifer recharge protection.	Hydrology – Studies / Water Budgets (PDF p. 6)	Partial	The State Plan supports hydrologic studies and coordination but focuses mainly on surface/estuarine hydrology.	Explicitly document groundwater/recharge relevance where applicable to Cape Coral management zones.
Chapter 8 - Recreation and Open Space	Goal 1 (PDF p. 1)	Provide parks/open space while preserving, protecting and enhancing natural amenities.	Purpose / Internal Classification (PDF p. 12)	Yes	The preserve’s classification and management priorities directly support this goal.	—
Chapter 8 - Recreation and Open Space	Policy 1.1 (PDF p. 1)	Maintain appropriate park land and open space in the public domain.	Overview / Acreage (PDF p. 5)	Yes	The State preserve is a major public conservation/open-space resource adjoining Cape Coral.	—
Chapter 8 - Recreation and Open Space	Public access / open-space objectives (PDF p. 1)	Provide appropriate access and recreational opportunities consistent with preservation.	Cape Coral Management Area – Existing Facilities / Conceptual Land Use (PDF p. 8)	Yes	North Cape Flats provides public trail access and the conceptual plan proposes amenity/parking improvements.	Add impact thresholds and coordination with City access/wayfinding planning.
Chapter 8 - Recreation and Open Space	Regional Park definition (PDF p. 2)	Regional parks should serve recreation needs while preserving unique landscapes, environmental areas and open space.	Park Purpose (PDF p. 5)	Yes	The State Plan balances resource-based recreation with conservation and gives resource protection priority.	—
Chapter 9 - Capital Improvements	Policy 1.5 (PDF p. 1)	Locate public facility expansion/construction to avoid impacts on unique or significant natural systems.	Land Use – Development Standard (PDF p. 117)	Yes	The State Plan explicitly restricts development to the minimum necessary for protection, limited access, safety and interpretation.	—

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Chapter 9 - Capital Improvements	Objective 2 / Policy 2.2 (PDF p. 2)	Limit new public facilities in the Coastal High-Hazard Area, except recreation/open space and resource protection.	Cape Coral Management Area – Trailhead Improvements (PDF p. 8)	Partial	The proposed Cape Coral action is recreational and therefore compatible in principle.	Before implementation, document CHHA/flood exposure and resilient design for parking/amenity improvements.
Chapter 9 - Capital Improvements	Policy 5.5(d) (PDF p. 7)	Avoid adverse effects on state-agency facility plans.	Hydrology – Interagency Coordination (PDF p. 35)	Yes	The State Plan itself calls for cross-agency coordination to avoid unintended off-site impacts.	—
Chapter 10 - Property Rights	Goal / Policy 1.1 (PDF p. 1)	Consider private property rights in local decision-making.	Optimum Boundary – Acquisition (PDF p. 128)	Partial	The State Plan identifies desired acquisitions but does not provide detail on acquisition procedures or private-property safeguards.	Add a statement that optimum-boundary identification does not alter private rights and that acquisition follows applicable voluntary/statutory processes.
Chapter 11 - Economic Development	Policy 2.4 (PDF p. 2)	Attract/develop businesses that do not negatively affect the natural environment and resources.	Secondary Uses / Revenue (PDF p. 12)	Yes	Although this policy is City/business-focused, the State Plan’s conservation-first restrictions are fully compatible with avoiding environmentally damaging economic uses.	—