



# Audubon FLORIDA

January 29, 2018

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**RE: CFX Environmental Advisory Committee Meeting, January 31, 2018, Concept Studies, Osecola County**

Dear Ms. Brooks:

I will not be able to attend the EAC meeting on January 31 due to family travel commitments. The following constitute my comments on the Concept Studies alternate alignments under consideration:

- (a) **Southport Expressway/Southport Connector alignments** – I recommend that the maximum possible avoidance of areas near the Disney Wilderness Preserve/Southport Ranch Mitigation Bank complex of conservation land be achieved by the route chosen. This generally translates into choosing the northernmost alignment possible. I recognize that there are site specific resource impacts implicated by all routes, however the greatest long term good from a conservation perspective will be achieved by a decision that will have the least management impact on such practices as prescribed fire with regard to the large conservation tracts already dedicated in perpetuity to that use, or which (such as Southport Ranch) are planned for 100% conservation easement protection. ALT 300 appears to be the route that practically achieves the greatest protection.
- (b) **Northeast Connector**- The most significant conservation land threat/opportunity relates to the 10,000+ acre Lake Conlin/Kirchman Foundation conservation land tract. Part of an alignment for the Northeast Connector crosses into this tract. However, the greatest threat to the existence of the Lake Conlin/Kirchman tract is the potential for an inadequate management endowment to trigger a legal process in the trust documents that will mandate that the tract be moved out of conservation and liquidated. Involving the Kirchman Foundation in the overall mitigation process for the Northeast Connector could help with the long term endowment of conservation management with this tract. Utilizing this tract as mitigation for CFX impacts in Osceola County should be pursued.
- (c) **Osceola Parkway Extension** – The challenge with this project involves minimization of the impacts to Split Oak Preserve/Mitigation area, Moss Park, and Isle of Pines Preserve.

It must be recognized that there is a linkage between road construction and the rapidly expanding urban growth in the “Northeast District” plan area of Osceola County that fronts on several miles of the boundary of Split Oak, Moss Park, and Isle of Pines. Looking at the road issue standing alone, it would be better to select a route that avoids Split Oake Preserve entirely. However, selecting such a route may not be practical considering the very expensive land acquisition cost associated with taking land in an area of rapidly developing and previously approved residential subdivision projects. Given those facts, choosing a route that minimally impacts Split Oak Preserve, and which also offers very substantial compensating land benefits to Split Oak, Moss Park, and Isle of Pines is the solution that would appear to benefit these conservation lands to the greatest degree. Recent presentations by CFX staff of alignment “RFNMT 1” suggest that a route could be located in the southwest extremity of Split Oak Preserve with an impact on the preserve in the range of 150 acres of land within Split Oak that either would be occupied by the expressway right of way or would be land isolated to the south and west of the right of way. Such an alignment, combined with the acquisition of approximately 1,500 acres of compensating lands located on the east and south boundaries of Split Oak, the south boundary of Moss Park, and the south boundary of Isle of Pines in Osceola County, and the east boundary of Isle of Pines in Orange County would be a beneficial solution. Given the major cost savings in right of way acquisition to CFX if such a route were chosen, CFX should be prepared to commit substantial economic resources to land acquisition, restoration, and long term management of such compensation lands. Portions of the compensation land could also be utilized by CFX to meet mitigation needs for the entire Osceola Parkway Extension alignment. Above all else, the original PDE alignment that “splits Split Oak” in two portions near the Orange County Line must be avoided. It must be understood that any land within Split Oak Preserve that remains south of a new expressway will not be able to be managed properly due to the inability of management agencies to continue prescribed fire management. A decision by CFX to simply terminate the Osceola Parkway Extension at Narcoosee Road, leaving a decision on its future eastward route to a later date is likewise an unacceptable course of action. This course of action would almost certainly only allow time for residential and commercial development to preclude the available right of way alignments that today could provide for the above described minimization of impacts to Split Oak Preserve.

In conclusion, I regret being unable to attend the meeting on January 31, and hope these comments will be entered into the record of the meeting.

Sincerely,



Charles Lee  
Director of Advocacy

CC: Laura Kelley, Executive Director, CFX