



# Operational Audit

Steve Sarkozy  
June 19, 2024



Joanne Ribble  
Vice Mayor  
District One

Larry Fiesel  
District Two

Jon McLain  
Mayor  
District Three

Lari Payne  
District Four

Rafael Lopez  
District Five

Jim Ward  
District Six

George Zalucki  
District Seven

Steve Sarkozy  
Village Manager

Robert M.  
Eichenfelder, Esq.  
Village Attorney

June 7, 2024

Mr. Robert Samaan  
Region 4 Administrator  
FEMA Region IV  
3003 Chamblee-Tucker Road  
Atlanta, GA 30341

Re: Village of Estero Response to the FEMA April 8, 2024, Letter and Narrative

Dear Mr. Samaan:

Thank you for allowing us the opportunity to provide a narrative regarding the Village of Estero's proactive and comprehensive approach to floodplain management which goes far beyond the 62 properties in the FEMA identified list.

The Village is providing the following documentation to support our conclusion that we comply with FEMA's regulations and further that we have a very proactive floodplain management program that exceeds minimum requirements of the national Flood Insurance Program (NFIP). The information provided is as follows:

1. Narrative of Estero's compliance procedures and process, including its overall comprehensive approach to floodplain management.
2. Community Outreach/Communication – included in Narrative.
3. SOPs for floodplain management - included in Narrative.
4. Map series and other supporting documentation – attached to narrative.
5. List of properties determined to be substantially damaged – paper copies provided to FEMA (James Mascellino) under separate cover on May 3, 2024.
6. List of permits issued in SFHA as of April 8 – provided paper copy under separate cover to FEMA (James Mascellino) on May 13, 2024.
7. Copies of Elevation Certificates received as of April 8, 2024 – provided paper copies under separate cover to FEMA (James Mascellino) on May 10, 2024.
8. List of demolition permits issued in the SFHA as of April 8, 2024 – provided paper copy under separate cover to FEMA (James Mascellino) on May 24, 2024.
9. List of Code Violations/stop work orders as of April 8, 2024 – provided paper copies under separate cover to FEMA (James Mascellino) on May 18, 2024.

Additionally, documentation for the properties identified by FEMA was provided by paper copy to James Mascellino, in separate "batches" as requested by FEMA, as follows:

April 16, 2024 - 13 properties

April 30, 2024 - 10 properties

May 10, 2024 - 14 properties

May 17, 2024 - 12 properties

May 28, 2024 - 7 properties

May 31, 2024 - 7 properties

June 1, 2024 - 2 properties

The following narrative is intended to describe the proactive approach by the Village that was, and is, intended to comply with all federal, State, and local regulations, more specifically related to FEMA and the NFIP. Also, we will explain that the proactive approach by the Village has had the objective of reducing the risks associated with natural disasters for the protection of property and life, and to reduce financial risks for the property owners, residents, and FEMA. In short, it describes the consistent alignment of our local policies with those of FEMA while demonstrating compliance with NFIP standards.

We believe that we have supplied all of the information requested and remain available should you and your staff have any additional questions.

We believe in the approach of FEMA and are a willing local partner. We believe that you will see the true spirit of our policies. Moving forward, we would ask that FEMA help us improve any policy or procedure without penalizing the very community that clearly supports this common agenda.

Of course, we are available for any questions that you may have regarding any portion of the narrative.

Respectfully,

Steve Sarkozy,  
Estero Village Manager

Attachment: Narrative



## VILLAGE OF ESTERO – NARRATIVE

(Provided to FEMA, June 7, 2024)

When asked about what should be included in this Narrative we were told to “cover the universe of what we do” as it relates to FEMA and the CRS program. Also, describe in detail “how our operation is consistent with the minimum standards of the NFIP. This Narrative is intended to cover that entire spectrum in defense of our program.

Thus, this report will cover a wide range of topics to provide the context and specifics of what we do in partnership with FEMA.

### **BACKGROUND ON ESTERO, FLORIDA**

The Village of Estero is a relatively new community, only incorporated in 2015. As such, we are the 3<sup>rd</sup> newest Village, or City, in the State. The Incorporation was accomplished by an 85% plurality in the incorporation vote – the highest in any recent community-wide election and a true indication of the support for the Village among our community.

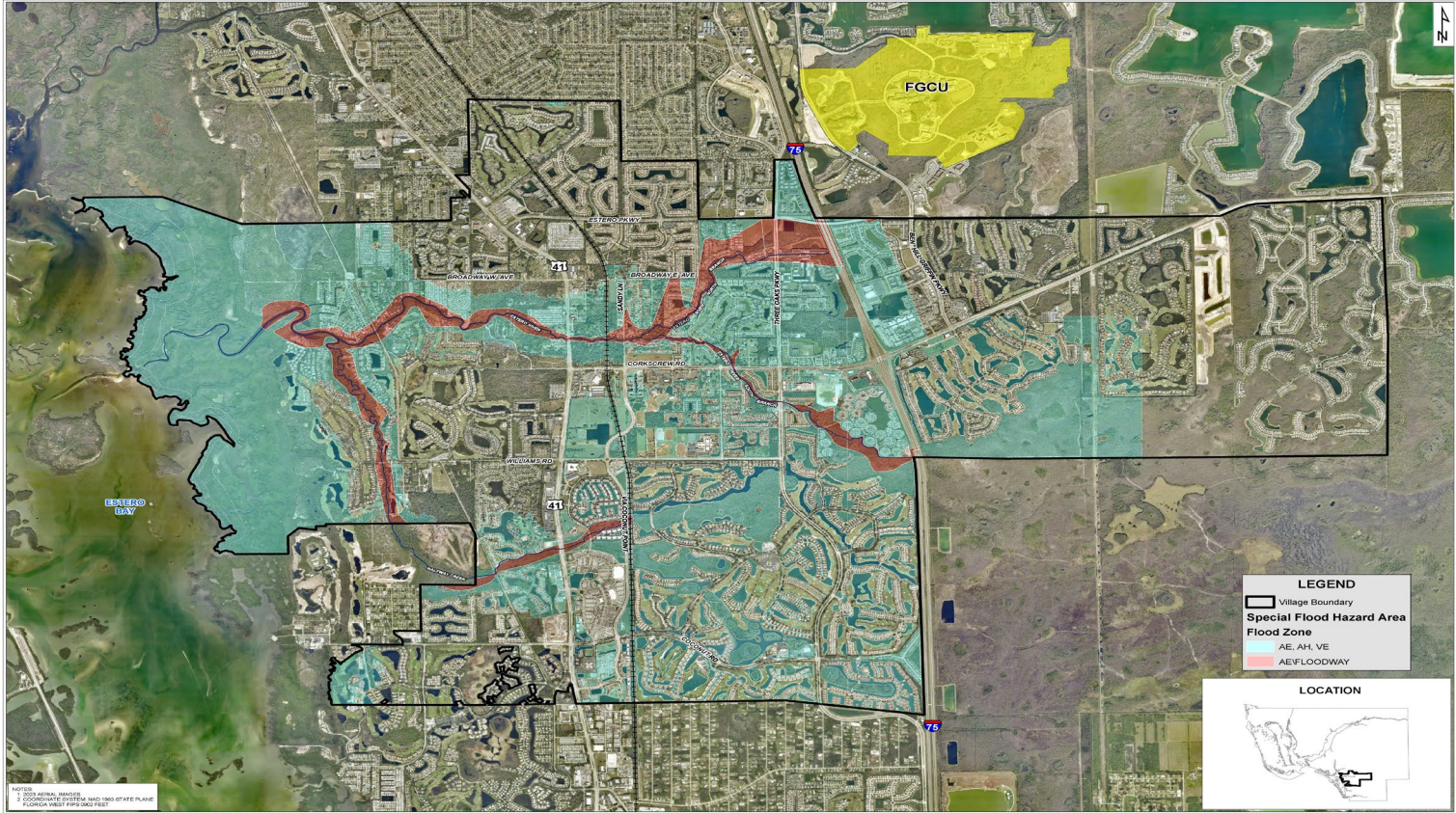
The Village has approximately 37,500 in population (60,000 in season). We have one of the lowest property tax rates in the State. We keep our property tax rate low as a benefit to all residents. We also operate on the principal of “Government Light”; with only 13 full-time employees. This formula allows us to direct financial resources on services, such as legacy property purchases, that benefit the community long-term.

The Village has also been proactive in its approach to the provision of services. Instead of managing Village services by political whim, we have adopted an approach of professional leadership whereby staff advises the Village Council utilizing “Master Plans” in each of our areas of operational responsibility. Thus, we have active Master Plans in the following functional areas:

- Parks and Open Space,
- Village Wide Transportation Study,
- Bike and Pedestrian Services,
- Community Comprehensive Plan and Land Development Code, and
- The Storm Water Master Plan

Of particular importance to this Narrative is the preparation and implementation of the Storm Water Master Plan. The entire focus of that Plan was, and is, to develop measures to protect people and property in the event of natural hazards, in particular major flooding and hurricanes.

# Special Flood Hazard Area Map 1



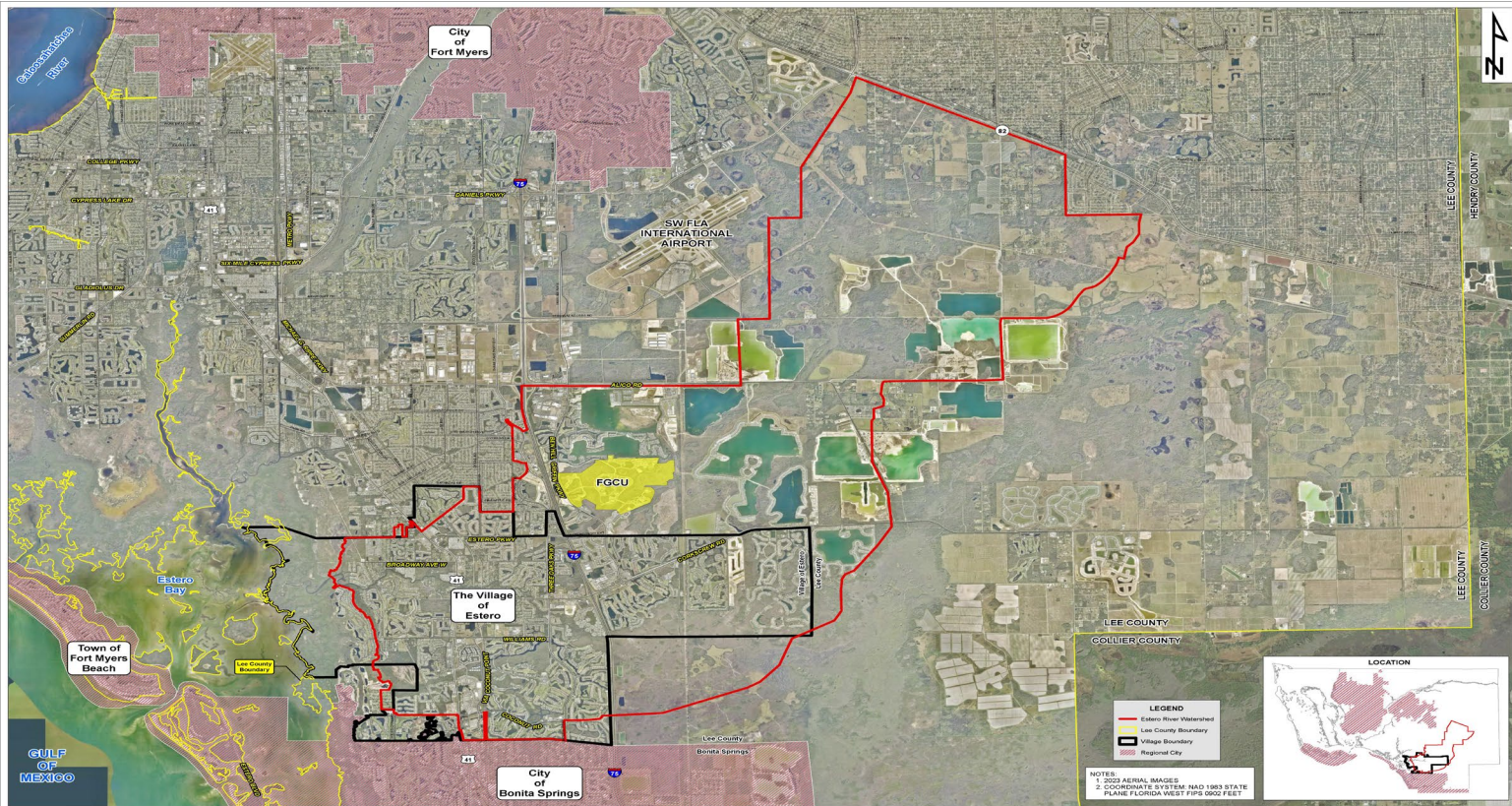
NOTES:  
1. 2023 AERIAL PHOTO  
2. COORDINATE SYSTEM: NAD 83 08 STATE PLANE  
3. SOURCE: WEST PAPERLANDS

**LEGEND**

- Village Boundary
- Special Flood Hazard Area
- Flood Zone
  - AE, AH, VE
  - AE FLOODWAY

**LOCATION**

# Estero River Watershed Map 2



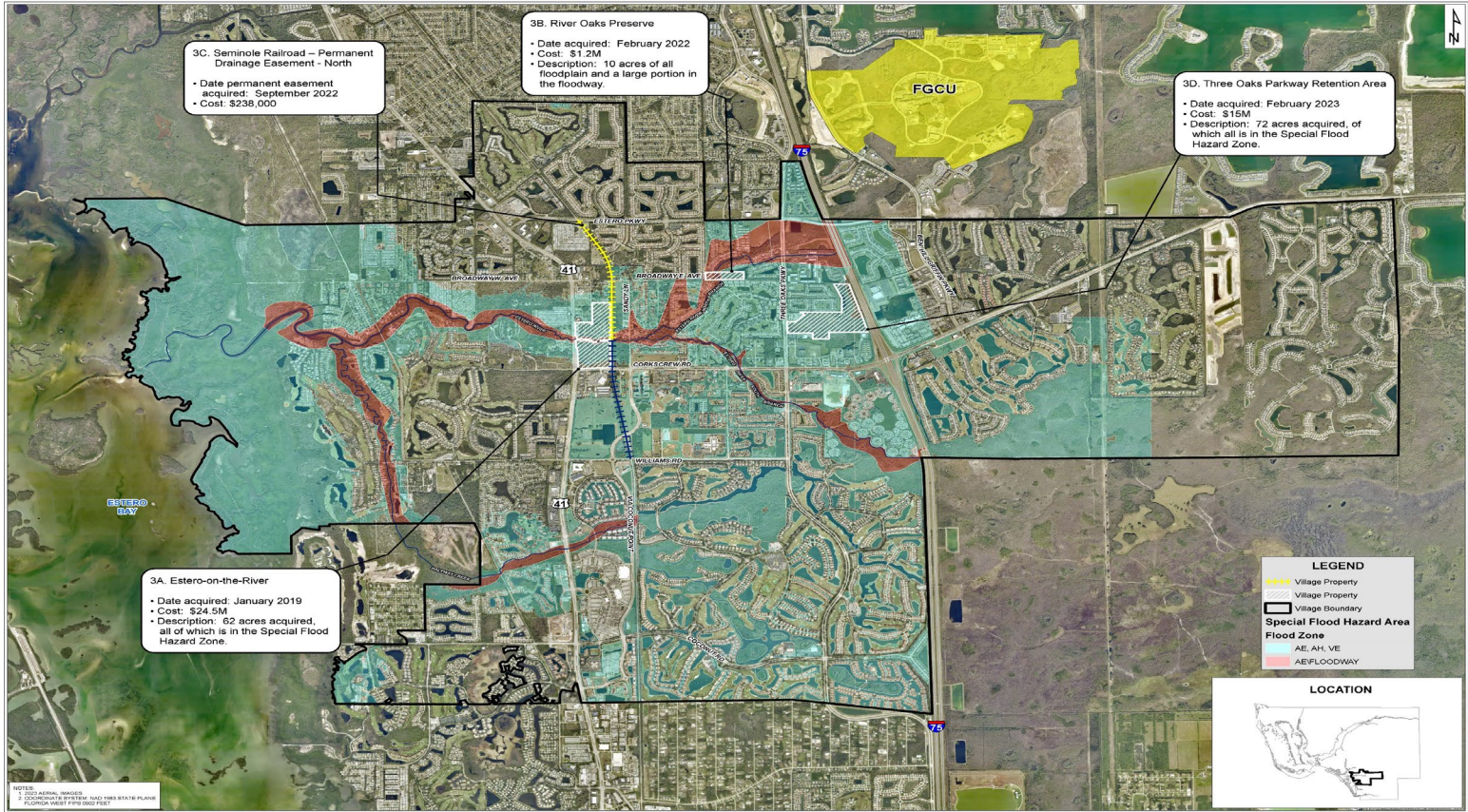
**LEGEND**

- Estero River Watershed
- Lee County Boundary
- Village Boundary
- Regional City

**NOTES:**  
 1. 2024 AERIAL IMAGES  
 2. COORDINATE SYSTEM: NAD 1983 STATE PLANE FLORIDA WEST FIPS 5002 FEET

**LOCATION**

# Village Properties in Special Flood Hazard Area Map 3



**3C. Seminole Railroad – Permanent Drainage Easement - North**

- Date permanent easement acquired: September 2022
- Cost: \$238,000

**3B. River Oaks Preserve**

- Date acquired: February 2022
- Cost: \$1.2M
- Description: 10 acres of all floodplain and a large portion in the floodway.

**3D. Three Oaks Parkway Retention Area**

- Date acquired: February 2023
- Cost: \$15M
- Description: 72 acres acquired, of which all is in the Special Flood Hazard Zone.

**3A. Estero-on-the-River**

- Date acquired: January 2019
- Cost: \$24.5M
- Description: 62 acres acquired, all of which is in the Special Flood Hazard Zone.

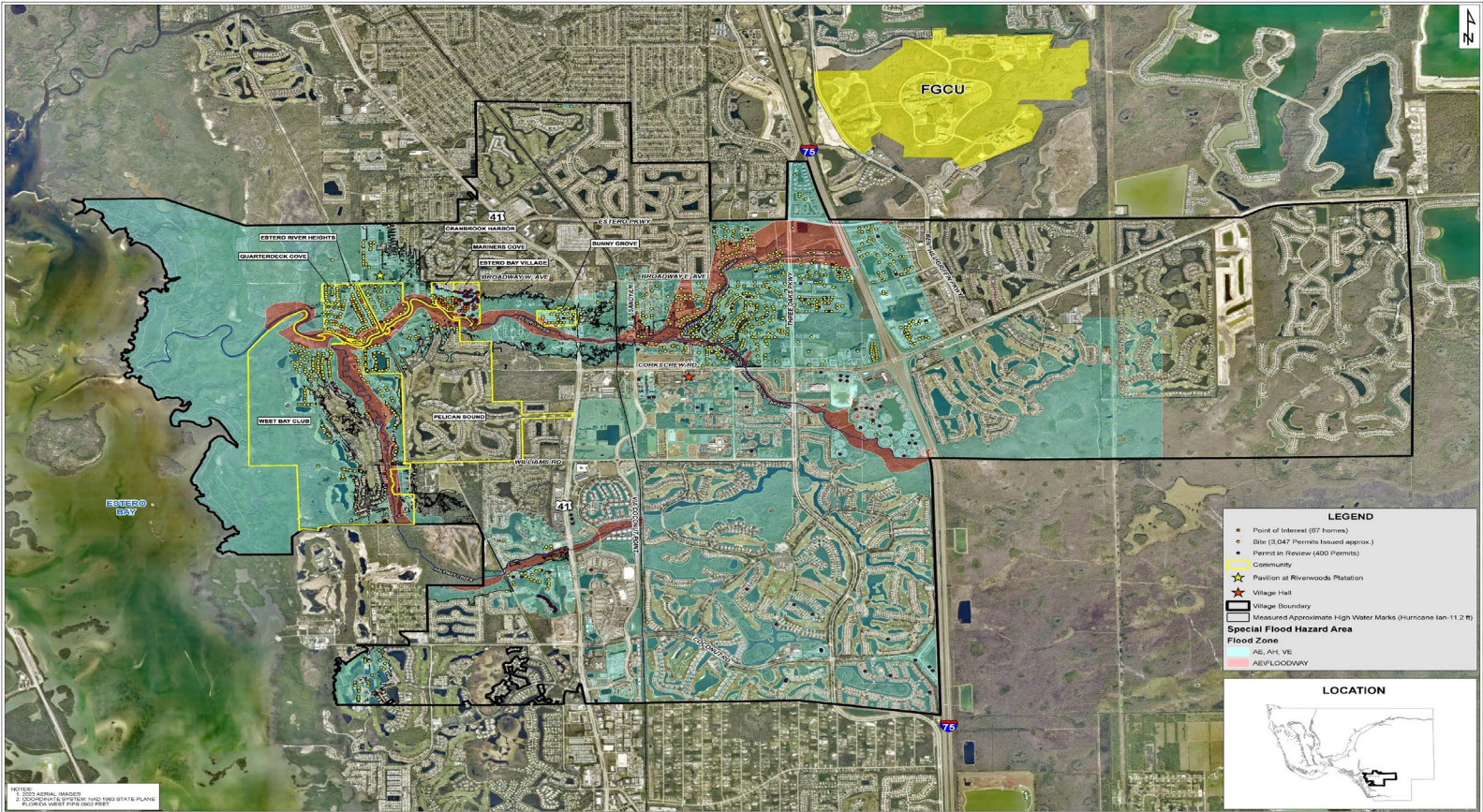
**LEGEND**

- Yellow outline: Village Property
- Black outline: Village Boundary
- Red: Special Flood Hazard Area
- Pink: Flood Zone
- AE, AH, VE
- AE/FLOODWAY



NOTES:  
1. COASTAL AERIAL IMAGES: 1/2013 (1985 STATE PLAN)  
FLORIDA WEST F 198 5002 FEET

# Permits in Special Flood Hazard Area Map 4



NOTES:  
1. 2001 AERIAL IMAGERY  
2. COMMUNITY MAP SYSTEM AND 1995 STATE PLANS  
3. FEDERAL AERIAL PHOTOGRAPHY (FAP) 1987

**LEGEND**

- Point of Interest (57 homes)
- Site (3,047 Permits Issued approx.)
- Permit in Review (400 Permits)
- Community
- ★ Pavilion at Riverwoods Plantation
- ★ Village Hall
- ▭ Village Boundary
- ▭ Measured Approximate High Water Marks (Hurricane Ian-11.2 Ft)

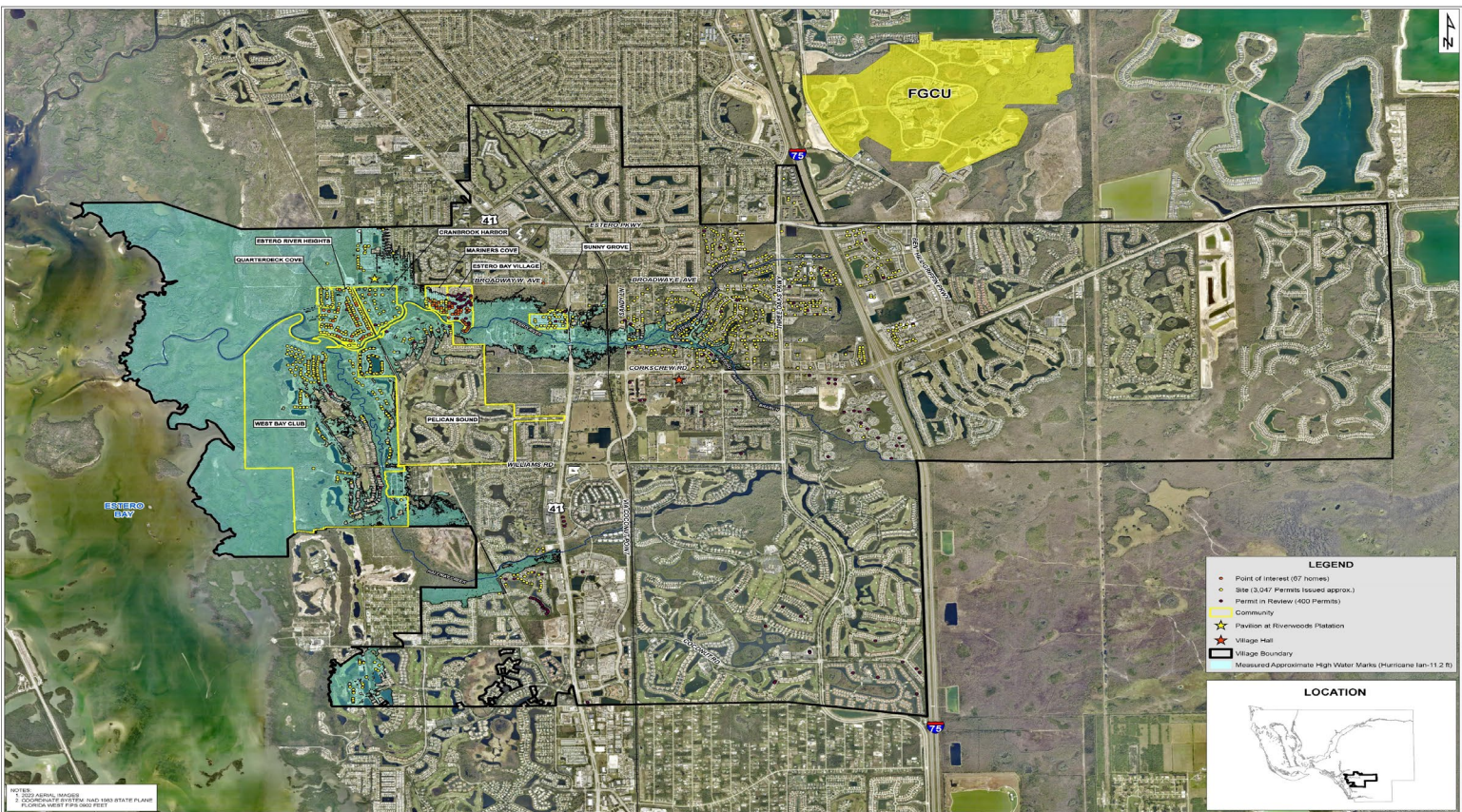
**Special Flood Hazard Area**

**Flood Zone**

- AE1 VE
- AE1 FLOODWAY

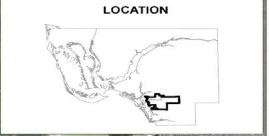
**LOCATION**

# Permits in Hurricane IAN Flood Area Map 5



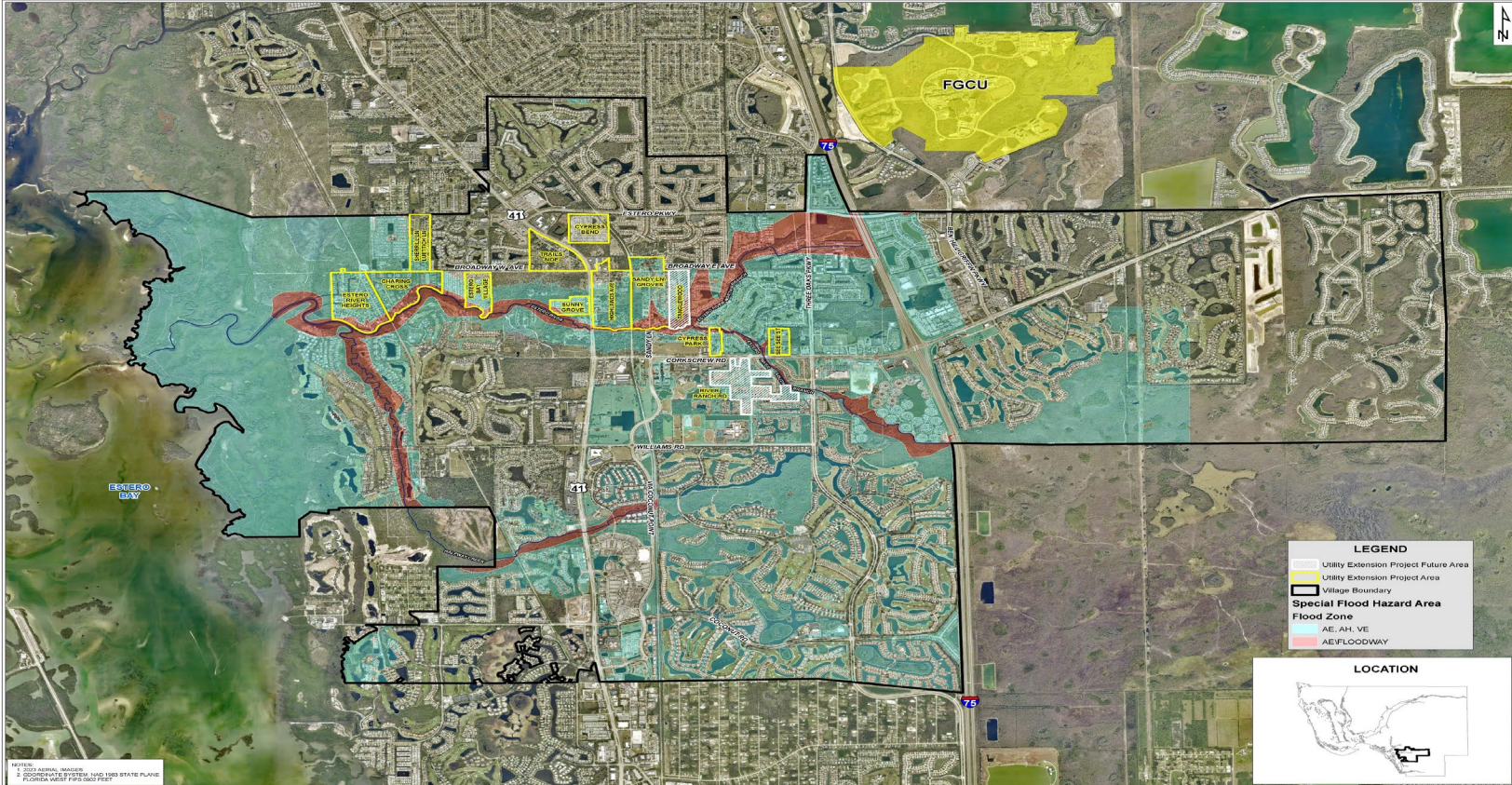
NO 2019 AERIAL IMAGES  
© 2008/2014 ESSEX ROAD 1883 STATE PLANT  
FLORIDA WEST FPS 0602 FEET

- LEGEND**
- Point of Interest (67 features)
  - Site (3,047 Permits (Issued approx.))
  - Permit in Review (400 Permits)
  - Community
  - ★ Pavilion at Riverwoods Station
  - ★ Village Mall
  - ▭ Village Boundary
  - ▭ Measured Approximate High Water Marks (Hurricane Ian-11.2 ft)





# Utility Extension Projects (Septic to Sewer) Special Flood Hazard Area Map 6



MAP 6  
 2024 AERIAL IMAGES  
 1. 2024 AERIAL IMAGES  
 2. COORDINATE SYSTEM: NAD 83 UTM STATE PLANE  
 3. GEOTIFF: 2024\_AERIAL\_000000000000.tif



8401 COORINGREW PALMS CIRCLE  
 ESTERO, FL 33928  
 P: 239.211.9239  
 Web: EsteroFL.gov

**UTILITY EXTENSION PROJECTS**  
 VILLAGE OF ESTERO - FLORIDA

SCALE: 1" = 0.2 mi  
 PRINTED: 6/6/2024

**MAP 6**

# CIP FY 2024-2025



Capital Improvement Plan - FY 2024-2025									EXHIBIT "F"
Project Name	Estimated Project Cost	Funding Source	Budget FY 24-25	Budget FY 25-26	Budget FY 26-27	Budget FY 27-28	Budget FY 28-29	Total Cost	
<b>Utility Improvements</b>									
1	Package WWTP UEP Design & Permitting	Grant - Reimburse	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
1		PA	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
1		GF	\$ 110,000	\$ -	\$ -	\$ -	\$ -	\$ 110,000	
2	Broadway W UEP Design & Permitting	Grant - Reimburse	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
2		PA	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
2		GF	\$ 147,500	\$ -	\$ -	\$ -	\$ -	\$ 147,500	
3	Broadway E UEP Design & Permitting	Grant - Reimburse	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
3		PA	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
3		GF	\$ 697,500	\$ -	\$ -	\$ -	\$ -	\$ 697,500	
4	See See Street UEP Design & Permitting	Grant - Reimburse	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
4		PA	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
4		GF	\$ 48,100	\$ -	\$ -	\$ -	\$ -	\$ 48,100	
5	Cypress Park UEP Design & Permitting	Grant - Reimburse	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
5		PA	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	
5		GF	\$ 280,485	\$ -	\$ -	\$ -	\$ -	\$ 280,485	
6	Estero Bay Village UEP	Grant - Reimburse	\$ -	\$ (962,040)	\$ -	\$ -	\$ -	\$ (962,040)	
6		PA	\$ -	\$ -	\$ (962,040)	\$ -	\$ -	\$ (962,040)	
6		GF	\$ -	\$ 1,924,080	\$ -	\$ -	\$ -	\$ 1,924,080	
7	Sunny Groves UEP	Grant - Reimburse	\$ (1,450,000)	\$ -	\$ -	\$ -	\$ -	\$ (1,450,000)	
7		PA	\$ -	\$ (1,450,000)	\$ -	\$ -	\$ -	\$ (1,450,000)	
7		GF	\$ 2,900,000	\$ -	\$ -	\$ -	\$ -	\$ 2,900,000	
8	Cypress Bend UEP	Grant - Reimburse	\$ (850,000)	\$ -	\$ -	\$ -	\$ -	\$ (850,000)	
8		PA	\$ -	\$ (850,000)	\$ -	\$ -	\$ -	\$ (850,000)	
8		GF	\$ 1,700,000	\$ -	\$ -	\$ -	\$ -	\$ 1,700,000	

# CIP FY 2024-2025 con't



Capital Improvement Plan - FY 2024-2025								
Project Name	Estimated Project Cost	Funding Source	Budget FY 24-25	Budget FY 25-26	Budget FY 26-27	Budget FY 27-28	Budget FY 28-29	Total Cost
9 Estero River Heights UEP	\$ 10,773,521	Grant - Reimburse	\$ (4,750,000)	\$ -	\$ -	\$ -	\$ -	\$ (4,750,000)
9		PA	\$ -	\$ (6,023,521)	\$ -	\$ -	\$ -	\$ (6,023,521)
9		GF	\$ 10,773,521	\$ -	\$ -	\$ -	\$ -	\$ 10,773,521
10 Charring Cross UEP	\$ 5,497,502	Grant - Reimburse	\$ (2,750,000)	\$ -	\$ -	\$ -	\$ -	\$ (2,750,000)
10		PA	\$ -	\$ (2,747,502)	\$ -	\$ -	\$ -	\$ (2,747,502)
10		GF	\$ 5,497,502	\$ -	\$ -	\$ -	\$ -	\$ 5,497,502
11 Sherrill & Luetich UEP	\$ 7,739,585	Grant - Reimburse	\$ -	\$ -	\$ (7,739,585)	\$ -	\$ -	\$ (7,739,585)
11		PA	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
11		GF	\$ -	\$ -	\$ 7,739,585	\$ -	\$ -	\$ 7,739,585
12 Trailside UEP	\$ 6,840,000	Grant - Reimburse	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
12		PA	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
12		GF	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
13 Broadway E-Highlands UEP	\$ 4,200,000	Grant - Reimburse	\$ -	\$ (2,100,000)	\$ -	\$ -	\$ -	\$ (2,100,000)
13		PA	\$ -	\$ -	\$ (2,100,000)	\$ -	\$ -	\$ (2,100,000)
13		GF	\$ -	\$ 4,200,000	\$ -	\$ -	\$ -	\$ 4,200,000
14 Sandy Ln-Groves UEP	\$ 5,160,000	Grant - Reimburse	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
14		PA	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
14		GF	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
15 Tanglewood UEP	\$ 1,440,000	Grant - Reimburse	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
15		PA	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
15		GF	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
16 See See Street UEP	\$ 1,070,000	Grant - Reimburse	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
16		PA	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
16		GF	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
17 Cypress Park UEP	\$ 1,820,000	Grant - Reimburse	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
17		PA	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
17		GF	\$ 272,000	\$ -	\$ -	\$ -	\$ -	\$ 272,000
			\$ 22,426,608	\$ 6,124,080	\$ 7,739,585	\$ -	\$ -	\$ 36,290,273

# PROPERTY ACQUISITIONS & PERMANENT MAINTENANCE EASEMENTS



## EXHIBIT "E"

**PROPERTY ACQUISITIONS & PERMANENT MAINTENANCE EASEMENTS**

- Map "3.A": Estero-on-the-River
  - Date acquired: January 2019
  - Cost: \$24.5M
  - Description: 62 acres acquired, all of which is in the Special Flood Hazard Zone. 40 will be retained as Open Space – Parks Preserve.
  - Development precluded: previously rezoned (by Lee County prior to our incorporation) with 300,000 square feet of commercial and 530 residential housing units
- Map "3.B": River Oaks Preserve
  - Date acquired: February 2022
  - Cost: \$1.2M
  - Description: 10 acres of all floodplain and a large portion in the floodway; entire site to be held as Open Space – Park Preserve.
  - Development precluded: Previously rezoned (by Lee County prior to our incorporation) with 40 housing units (all in the floodplain)
- Map "3.C": Seminole Railroad – Permanent Drainage Easement - North
  - Date permanent easement acquired: September 2022
  - Cost: \$238,000 one-time cost; annual cost to maintain = \$100,000.
  - Description: This ditch along the railroad tracks was never acquired or officially designated as part of the storm water channel – and, never maintained. The lack of maintenance led to substantial flooding during Hurricane IRMA, now corrected.
- Map "3.D": Three Oaks Parkway Retention Area
  - Date acquired: February 2023
  - Cost: \$15M
  - Description: 72 acres acquired, of which all is in the Special Flood Hazard Zone. Entire site to be used for Open Space – Storm Water Detention Area that is designed to mitigate any future flooding in the immediate area.
  - Development precluded: Previously rezoned (by Lee County prior to incorporation) and permitted for the removal of all on-site wetlands by the Lee County Public Schools for the potential development of 300 to 500 housing units (at only 6 to 8 units per acre)

**PROPOSED PROPERTY ACQUISITIONS:**

- Map "3.E": Seminole Railroad – Permanent Drainage Easement – South
  - Similar to Map 3.C above; in negotiation
  - Expected date of completion: early 2025.
- No map designation: Estero River Frontage Property Acquisitions
  - Proposed acquisitions of multiple home sites along the River.
  - Expected date of completion: efforts are on-going, yet unsuccessful to date.

=====

**SUMMARY OF PROPERTY ACQUISITIONS:**

**144.5 acres acquired**

**All in the Special Flood Hazard Zone**

**Total cost of \$40,700,000**

**Acquisitions by the Village prevented the impacts of previously permitted development activity including:**

- **300,000 square feet of commercial development, and**
- **Between 870 and 1,070 additional housing units – all in the Special Flood Hazard Zone**

**Entire cost of \$40.7M paid entirely by the Village of Estero**

**No grants used in the purchase of property**



6/11/24, 8:46 AM

CIS: CRS What If

## CRS What-If

Application   Contacts   Activity Points   Chronology   ECR Report Findings   Comments   What If   GTA

Community: ESTERO, VILLAGE OF   State: FLORIDA  
 County: LEE COUNTY   CID: 120260

Current CRS Class = 6 (Printable Version)

	TOTAL	SFHA *	X- STDJAR/A99 **	PRP ***
PIF	1,022	160	882	0
PREMIUM	\$704,187	\$134,701	\$569,486	\$0
AVERAGE PREMIUM	\$689	\$842	\$681	\$0

CRS Class				
09	Per Policy	\$39	\$53	\$37
	Per Community	\$40,057	\$8,419	\$31,638
08	Per Policy	\$47	\$105	\$37
	Per Community	\$48,476	\$16,838	\$31,638
07	Per Policy	\$56	\$158	\$37
	Per Community	\$56,894	\$25,256	\$31,638
06	Per Policy	\$95	\$210	\$73
	Per Community	\$96,852	\$33,675	\$63,277
05	Per Policy	\$103	\$263	\$73
	Per Community	\$105,371	\$42,094	\$63,277
04	Per Policy	\$111	\$316	\$73
	Per Community	\$113,790	\$50,513	\$63,277
03	Per Policy	\$120	\$368	\$73
	Per Community	\$122,208	\$58,932	\$63,277
02	Per Policy	\$128	\$421	\$73
	Per Community	\$130,627	\$67,350	\$63,277
01	Per Policy	\$136	\$474	\$73
	Per Community	\$138,046	\$75,769	\$63,277

\* SFHA (Zones A, AE, A1-A30, V, V1-V30, AO, and AH); Discount varies depending on class.

\*\* SFHA (Zones A99, AR, ARIA, ARAE, ARIA1-A30, ARIA/1, and ARIA/O); 10% discount for Classes 1-6; 5% discount for Classes 7-9.

\*\*\* Preferred Risk Policies are not eligible for CRS Premium Discounts.



[FEMA OPERATIONAL AUDIT - Village of Estero,  
FL \(estero-fl.gov\)](http://estero-fl.gov)



# QUESTIONS?