

Phase I Environmental Site Assessment

for the

**Bonita Estero Rail Trail (BERT)
Lee and Collier Counties, Florida**

July 21, 2026

Prepared for:



Prepared by:



Notice

This Phase I Environmental Site Assessment (ESA) report is presented for the use of the Trust for Public Land (TPL), the Village of Estero, the City of Bonita Springs, and Collier County (hereinafter referred to jointly as Users or “the client”), their agent(s), successors, and assigns. The information and conclusions reached herein are not intended to be relied on by any other person or entity. Though legal and/or regulatory information may be contained herein, said information is not intended to constitute legal advice or opinion, and, to the extent such legal advice or opinion is required, the client is advised to seek the advice of legal counsel. The findings contained herein are limited by the scope of the field activities specified in the report and the quality and type of information provided and/or made available to S&S Environmental Consultants, LLC (S&S) for review and are subject to revision if additional or more definitive information becomes available.

Executive Summary

S&S Environmental Consultants LLC (S&S) performed a Phase I Environmental Site Assessment (ESA) for the Trust for Public Land (TPL), the Village of Estero, the City of Bonita Springs, and Collier County, i.e., the Users of this Phase I ESA. This Phase I ESA has been prepared in response to the Notice to Proceed (NTP) received from TPL on July 1, 2026.

The purpose of the Phase I ESA was to determine if there are potential recognized environmental conditions (RECs), historical recognized environmental conditions (HRECs), or controlled recognized conditions (CRECs) at the subject property. This Phase I ESA was conducted in general conformance with American Society for Testing and Materials (ASTM) E1527-21, “Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process,” and the U.S. Environmental Protection Agency’s (USEPA’s) “Standards and Practices for All Appropriate Inquiries” (AAI) Final Rule, as promulgated on November 1, 2005 (amended December 15, 2022).

The subject property is an approximately 11.4-mile, unused railroad right-of-way (ROW) beginning immediately south of Estero Parkway extending south to Railhead Scrub Preserve in Collier County (see Figures 1, 2A, 2B, and 2C). According to information obtained from the Lee County and the Collier County Property Appraiser offices, the subject property is comprised of sixteen parcels (see Section 1 and Appendix A). The center of the subject property has an approximate latitude and longitude of 26.370759N and - 81.802379W in Sections 02, 03, 10, 15, 22, 26, 27, 28, 33 and 35; Townships 46, 47, and 48 South, Range 25 East.

S&S representatives Richard Stephens, the S&S qualified environmental professional (QEP) for this Phase I ESA and Mr. Chris Kennedy, S&S Staff Scientist, conducted the site reconnaissance on July 8, 2026.

Findings

A site map showing the general findings of the site reconnaissance are provided as Figures ES2A, ES2B and ES2C.

- The subject property was first developed as a railroad corridor in the 1920s. Residual contamination from former railroad operations may exist at the subject property. Some historic railroad operations involved the use of chemicals that may have resulted in the presence of contamination today. The most commonly reported contamination along rail lines includes metals, pesticides (such as lead arsenate), and constituents of oil or fuel (petroleum products). These chemicals have been associated with normal railroad operations and are likely to be found anywhere along the corridor. For example, it would not be uncommon to find arsenic present in the soil along a ROW from old railroad ties dipped in an arsenic solution, arsenic weed-control sprays, and arsenic-laced slag used as railroad bed fill. Lubricating oil and diesel that dripped from the trains are likely sources of the petroleum product found along the lines. Other sources of contaminants associated with historic railroad operation may include coal ash from engines, creosote from ties, and polynuclear aromatic hydrocarbons (PAHs) from the diesel exhaust (Commonwealth of

Massachusetts 2016). The potential presence of heavy metals (arsenic and lead) and PAHs should be considered an REC.

- The Tisch Laundry site (USEPA # FLD981859820; see Section 4.2) is located immediately adjacent to the subject property on West Terry Street in Bonita Springs. Tisch Laundry is under long-term monitoring for groundwater contamination. Based on the site file review and discussion with the USEPA project manager, groundwater beneath the railroad ROW may be impacted by chlorinated drycleaning solvents. The potential presence of contamination in the shallow groundwater beneath the subject should be considered a REC.

Conclusions and Opinions

S&S has performed a Phase I ESA of the subject property in general conformance with the scope and limitations of ASTM E1527-21 and the USEPA AAI. Exceptions to, or deletions from, this practice are described in Sections 1.2 and 1.3. The subject property is an 11.4-mile, unused railroad ROW that begins immediately south of Estero Parkway in the Village of Estero, extends south through the City of Bonita Springs, and then terminates at the southern end of the Railhead Scrub Preserve in Collier County (see Figures ES1, ES2A, ES2B, and ES2C). This assessment has revealed the following RECs in connection with the subject property.

- The subject property has been a railroad ROW since the 1920s and, as such, the soils along the ROW may have been impacted by railroad operations.
- The Tisch Laundry site is under long-term monitoring, and the available site information suggests that groundwater beneath the subject property may be impacted with drycleaning solvents.

It is our opinion that a Phase II ESA is warranted for this subject property.



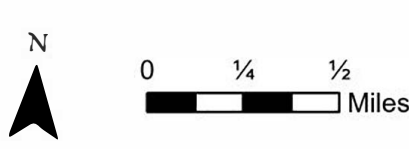
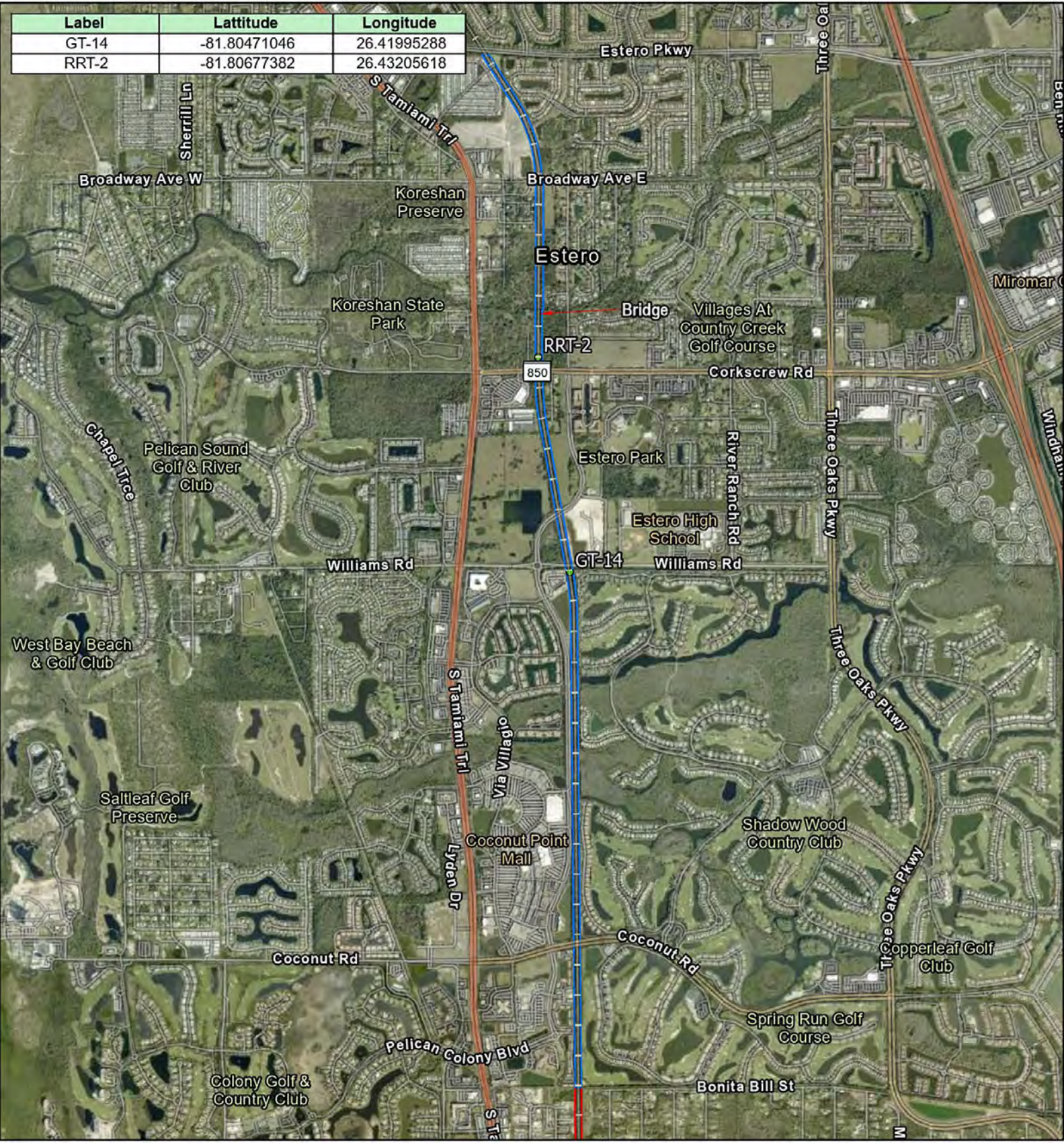
0 1/2 1 Miles

Legend

Subject Property

Figure ES1
Site Location Map
BERT Trail
Lee - Collier County, Florida

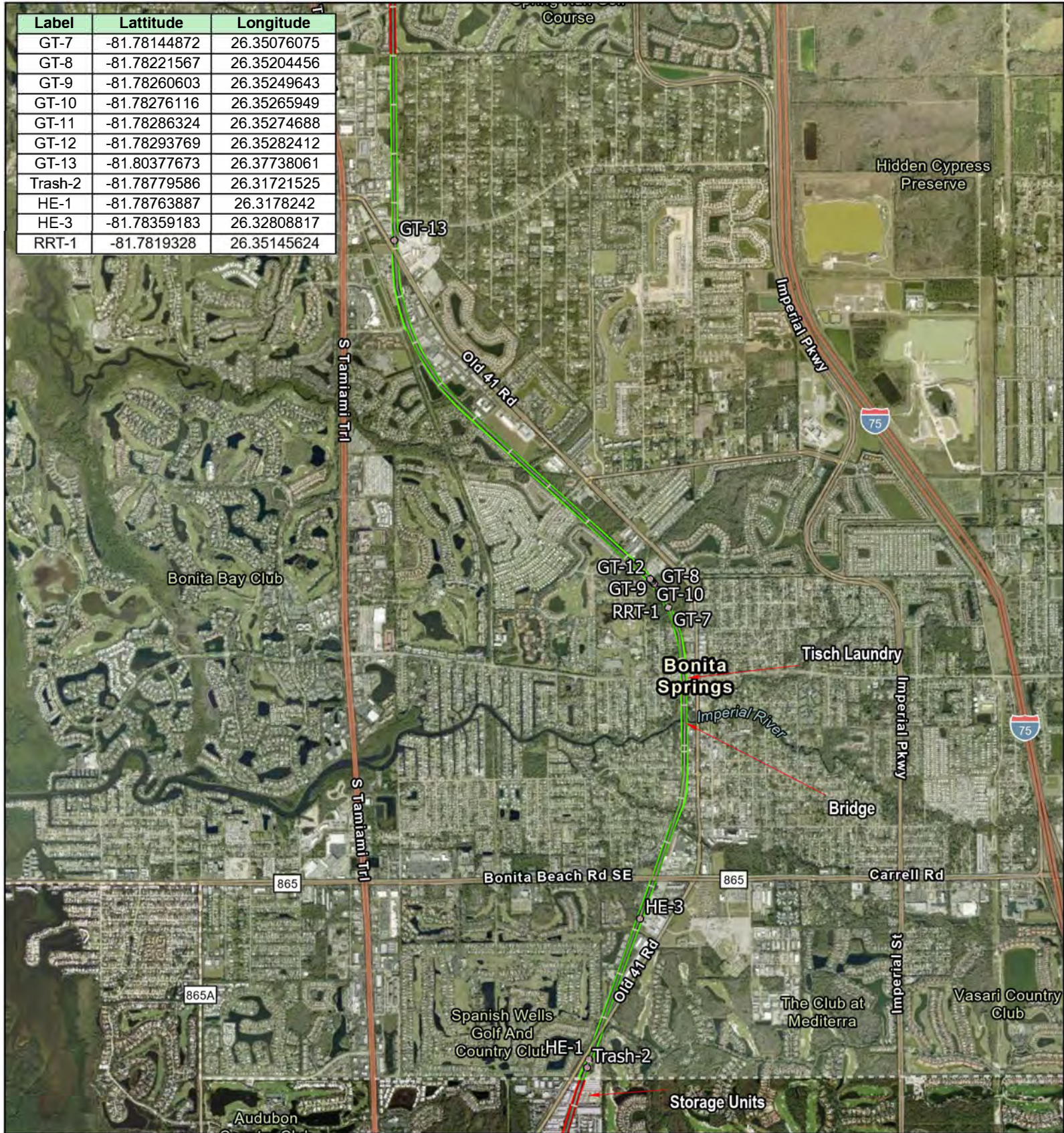
Label	Latitude	Longitude
GT-14	-81.80471046	26.41995288
RRT-2	-81.80677382	26.43205618



- Legend**
- Subject Property
 - Subject Property within Estero
 - Findings in Estero

Figure ES2A
Site Location Aerial Map
BERT Trail - Estero
Lee County, Florida

Label	Latitude	Longitude
GT-7	-81.78144872	26.35076075
GT-8	-81.78221567	26.35204456
GT-9	-81.78260603	26.35249643
GT-10	-81.78276116	26.35265949
GT-11	-81.78286324	26.35274688
GT-12	-81.78293769	26.35282412
GT-13	-81.80377673	26.37738061
Trash-2	-81.78779586	26.31721525
HE-1	-81.78763887	26.3178242
HE-3	-81.78359183	26.32808817
RRT-1	-81.7819328	26.35145624



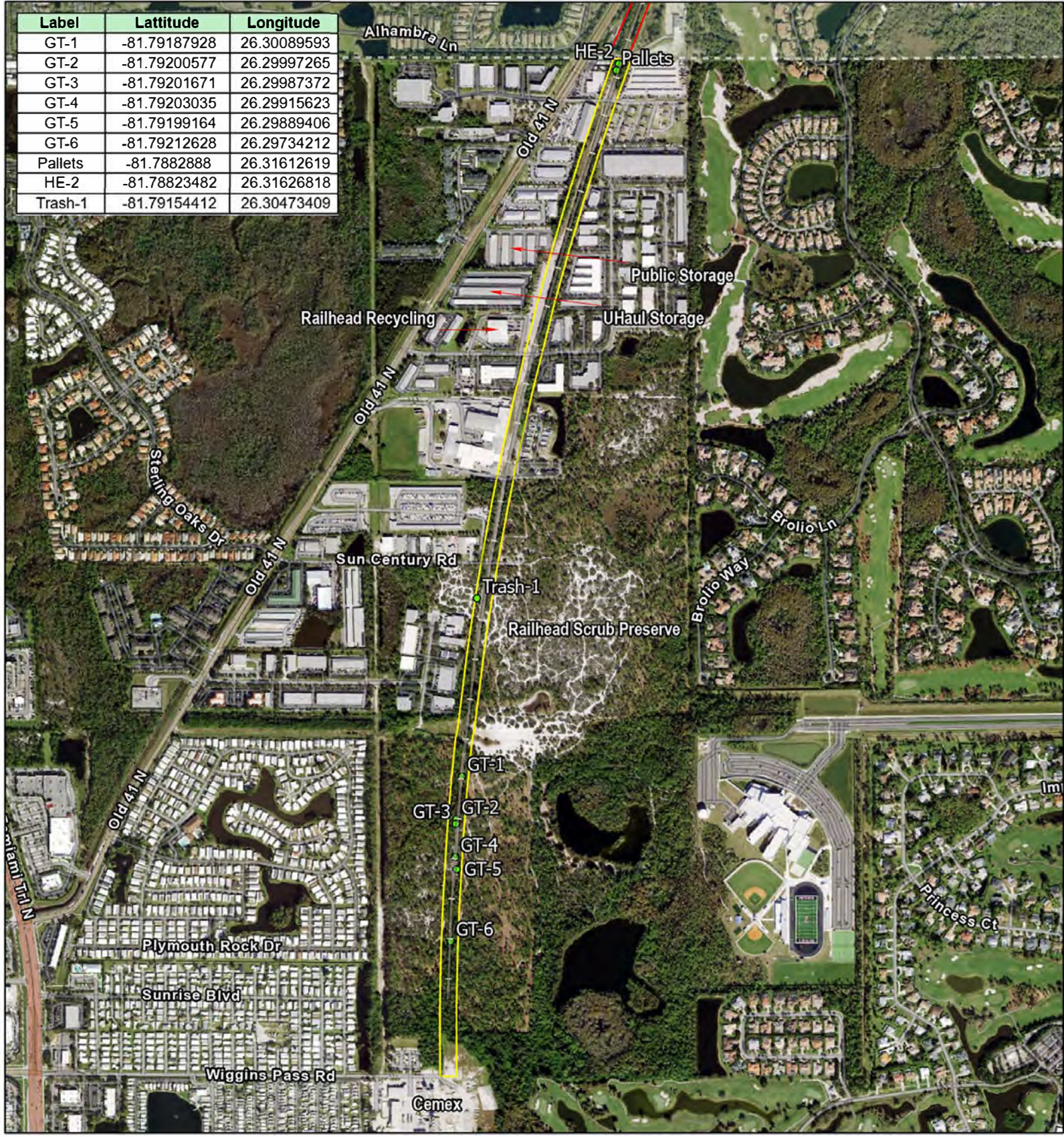
0 0.33 0.65
Miles

Legend

- Subject Property
- Bonita Springs
- Findings in Bonita Springs

Figure ES2B
Site Location Aerial Map
BERT Trail - Bonita springs
Lee County, Florida

Label	Latitude	Longitude
GT-1	-81.79187928	26.30089593
GT-2	-81.79200577	26.29997265
GT-3	-81.79201671	26.29987372
GT-4	-81.79203035	26.29915623
GT-5	-81.79199164	26.29889406
GT-6	-81.79212628	26.29734212
Pallets	-81.7882888	26.31612619
HE-2	-81.78823482	26.31626818
Trash-1	-81.79154412	26.30473409



0 0.07 0.15
Miles

Legend

- Subject Property
- Collier County
- Findings in Collier County

Figure ES2C
Site Location Aerial Map
BERT Trail - Collier County
Collier County, Florida

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Acronyms and Abbreviations

%	percent
°F	degrees Fahrenheit
AAI	all appropriate inquiries
ACL	Atlantic Coast Line
AMSL	above mean sea level
ASTM	ASTM International (<i>formerly</i> American Society for Testing and Materials)
AULs	Activity and Use Limitations
BERT	Bonita Estero Rail Trail (<i>also</i> subject property)
bls	Below land surface
Bonita Estero Rail Trail	subject property
CCPA	Collier County Property Appraiser
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
client, the	jointly, the Trust for Public Land, the Village of Estero, the City of Bonita Springs, and the Collier County
CREC	Conditioned Recognized Environmental Condition
DRF	Discharge Reporting Form
Envirosite	Envirosite Corporation
EPA	Environmental Protection Agency (<i>also</i> USEPA)
ERIC	Environmental Restoration Integrated Cleanup
ESA	Environmental Site Assessment
FDEP	Florida Department of Environmental Protection
FEMA	Federal Emergency Management Agency
FIM	Fire Insurance Map
Fm	formation
ft	feet/foot
HREC	Historical Recognized Environmental Condition
I-75	Interstate 75
LCPA	Lee County Property Appraiser
LLC	Limited Liability Company
LSAR	limited site assessment report

Acronyms and Abbreviations (continued)

LTGWMP	Long-Term Groundwater Monitoring Plan
LTMW	long-term monitoring wells
NFAP	No Further Action Proposal
NRCS	Natural Resources Conservation Service
NTP	Notice to Proceed
PAH	polynuclear aromatic hydrocarbon
PFAS	polyfluoroalkyl substances
QEP	Qualified Environmental Professional
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Condition
ROW	right-of-way
S&S	S&S Environmental Consultants LLC
SAR	Site Assessment Report
SCL	Seaboard Coast Line
SGLR	Seminole Gulf Railway, L.P.
South Tamiami Trail	U.S. Highway 41
SRCO	Site Rehabilitation Cleanup Order
subject property	Bonita Estero Rail Trail
TPL	Trust for Public Land
USEPA	United States Environmental Protection Agency (<i>also</i> EPA)
Users (of this Phase I ESA)	the Trust for Public Land, the Village of Estero, the City of Bonita Springs, and Collier County
USGS	United States Geological Survey
U.S. Highway 41	South Tamiami Trail
UST	underground storage tank
WWTP	wastewater treatment plant

Glossary of Key Terms

Recognized Environmental Condition (REC) — The term *recognized environmental condition* means (1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment. A *de minimis* condition is not a recognized environmental condition.

Controlled Recognized Environmental Condition (CREC) — A recognized environmental condition affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls.

De minimis condition — A condition related to a release that generally does not present a threat to human health.

Environmental professional — A person meeting the education, training, and experience requirements as set forth in 40 Code of Federal Regulations (CFR) § 312.10(b).

Historical Recognized Environmental Conditions — A previous release of hazardous substances or petroleum products affecting the subject property that has been addressed to the satisfaction of the applicable regulatory authority or authorities and meeting unrestricted use criteria established by the applicable regulatory authority or authorities without subjecting the subject property to any controls.

Key site manager — The person identified by the owner or operator of a subject property as having good knowledge of the uses and physical characteristics of the subject property.

Owner — Generally the fee owner of record of a property.

Release — A release of any hazardous substance or petroleum product shall have the same meaning as the definition of “release” in Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) 42 United States Code § 9601(22). There are a number of statutory exclusions from the definition of release that may impact the environmental professional’s opinions and conclusions, such as the normal application of fertilizer.

subject property — The property that is the subject of the environmental site assessment described in ASTM International (ASTM) E1527-21, “Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.”

User — The party(ies) seeking to use ASTM E1527-21 to complete an environmental site assessment of the subject property.

1 Introduction

S&S Environmental Consultants LLC (S&S) performed a Phase I Environmental Site Assessment (ESA) for the Trust for Public Land (TPL), the Village of Estero, the City of Bonita Springs, and Collier County, i.e., the Users of this Phase I ESA. This Phase I ESA has been prepared in response to the Notice to Proceed (NTP) received from TPL on July 1, 2026.

The Bonita Estero Rail Trail (BERT; subject property) is an approximately 11.4-mile, unused railroad right-of-way (ROW) beginning immediately south of Estero Parkway extending south to Railhead Scrub Preserve in Collier County (see Figures 1 and 2). For the purposes of this Phase I ESA, we have subdivided the subject property into the following three sections.

- **Estero (northern section)** – begins at Estero Parkway and extends south to just north of Bonita Bill Street in Bonita Springs.
- **Bonita Springs (central section)** – extends south from Bonita Bill Street to Channel 30 Drive.
- **Collier County (southern section)** – extends south from Channel 30 Drive and terminates at Railhead Scrub Preserve.

According to information obtained from the Lee County Property Appraiser (LCPA) and Collier County Property Appraiser (CCPA), the subject property is comprised of the following sixteen parcels (Appendix A). Fifteen parcels are in Lee County (seven in Estero and eight in Bonita Springs) and one parcel is in Collier County.

Lee County Parcels:

Estero: 284625E2U19492522, 284625E3U19562448, 334625E2U19562388, 334625E3U19642308, 034725E1U19782168, 104725E1U19792047, and 104725E4U19801966.

Bonita Springs: 154725B1000010000, 224725B4000010000, 274725B2000030000, 264725B1000010000, 354725B1000010010, 354725B4000010000, 024825B1000130000, and 034825B3000040000.

Collier County Parcel: 00145681504

The center of the subject property has an approximate latitude and longitude of 26.370759N and -81.802379W in Sections 02, 03, 10, 15, 22, 26, 27, 28, 33 and 35; Townships 46, 47, and 48 South, Range 25 East. This report presents the findings, opinions, and conclusions made as a result of assessing the subject property. The following appendices are also provided in support of this Phase I ESA.

- Appendix A – County Records: Lee and Collier County

- Appendix B – Title Search
- Appendix C –Envirosite Government Records Report
- Appendix D – Envirosite Historical Topographic Map Report
- Appendix E – Natural Resources Conservation Service Custom Soil Resource Report for Pinellas County, Florida – Bonita Estero Rail Trail
- Appendix F – Federal Emergency Management Agency Map
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- Appendix I – Envirosite Historical Aerial Photo Report
- Appendix J – Envirosite Historical Fire Insurance Maps Report
- Appendix K – Photographic Log
- Appendix L – Environmental Professional Resume

In addition, the following contractor’s checklist identifies sections of this report where relevant information can be located by the reader.

Bonita, Estero, Rail Trail (BERT)

EXHIBIT II

CONTRACTOR'S ITEMIZED CHECKLIST

Phase I ESA (ASTM E 1527 and ASTM E 2247); Updated Phase I ESA (ASTM E 1527 and ASTM E 2247)

Directions: Please fill in each blank with the appropriate response. An appendix may be indicated instead of page number(s), if appropriate.

- 1) YES/NO NA Have any requests for deviation to the DSL Scope of Services been approved?
- 2) Page # NA Certification to the Board of Trustees, with subsections a, b, c, d, and e.
- 3) Page # None Determination of whether other or previous ESAs or environmental work has been performed at the Subject Property. If other ESAs or environmental work exists, state the Appendix in which copies of the previous ESAs or environmental work can be found in the report: **Appendix** NA
- 4) Page # 16/17 Determination of existing environmental liens and AULs on the Subject Property.
Appendix G
- 5) Page # No Adjoining property landowner identification.
- 6) YES/NO YES Were any adjoining landowners interviewed? If so, what page number can this information be found on in the report? Page # —
- 7) Page # 22-25 Summary of current and historical aerial photographs.
Appendix I
- 8) Page # 30/32 GPS points and GPS manufacturer and model.
- 9) Page # Figures 2A, 2B & 2C Photograph points oriented on a site map to scale or current aerial photograph.
- 10) Page # 8/9 Groundwater information.
- 11) Page # 37 Data failure information.
- 12) Page # 35, 36, 38 Discussion and evaluation of findings, conclusions and recommendations.
Executive Summary

1.1 Purpose

The purpose of this Phase I ESA is to identify actual and potential recognized environmental conditions (RECs), historical recognized environmental conditions (HRECs), or controlled recognized environmental conditions (CRECs) associated with the subject property. This Phase I ESA was conducted in general conformance with American Society for Testing Materials (ASTM) E1527-21, “Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.”

On December 15, 2022, the United States Environmental Protection Agency (USEPA) published a Final Rule adopting ASTM E1527-21 as a standard satisfying the “all appropriate inquiries” (AAI) requirement for landowner liability defenses under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). As such, this assessment addresses RECs that indicate: (1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of a future release to the environment. RECs do not include *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate government agencies.

1.2 Scope of Services

This Phase I ESA was performed in accordance with ASTM E1527-21, “Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.” S&S reviewed readily available public records to determine the current and historical use of the subject property. S&S also examined readily available historical documents, governmental databases, deed records, aerial photographs, and governmental environmental files; conducted interviews with persons familiar with the subject property and/or surrounding area; and performed a site reconnaissance of the subject property to identify potential RECs that exist or may have existed at the site. Limitations, ASTM deviations, and significant data gaps (if identified) are noted in the applicable sections of this report.

S&S did not complete a chain-of-title search as part of this Phase I ESA; however, property records from Lee and Collier Counties were obtained and reviewed (Appendix A). Additionally, S&S did not perform a property valuation reduction for environmental issues as part of this Phase I ESA.

1.3 Limitations and Exceptions

This Phase I ESA is limited to the subject property, as described by TPL and detailed in Section 2.1. The information provided in this report is based on a review of the documents identified in Section 1.2; interviews with knowledgeable individuals; information provided by TPL, Lee County, Collier County, the Village of Estero, the City of Bonita Springs; and observations by an environmental professional.

The results, findings, opinions, and conclusions of this ESA are valid as of the date of the report. This ESA does not include any environmental sampling. Additionally, this ESA does not include an evaluation of non-scope items, per Section 13 of ASTM E1527-21.

1.4 Standard of Care

This Phase I ESA was performed in accordance with the accepted practices of this profession. Any specific limitations to this accepted standard are discussed in the text of this report and an evaluation of their significance is presented in Section 9. Phase I ESAs are of limited scope, non-invasive, and cannot eliminate the potential that hazardous, toxic, or petroleum substances are present or have been released at the site beyond what is identified by the limited scope of this ESA. No ESA can wholly eliminate uncertainty regarding the potential for RECs in connection with a property. Performance of this Phase I ESA is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs. No warranties, express or implied, are intended or made. The limitations herein must be considered when the User of this report formulates opinions as to risks associated with the site or otherwise uses the report for any other purpose. These risks may be further evaluated—but not eliminated—through additional research or assessment. We will, upon request, advise TPL, the Village of Estero, the City of Bonita Springs, and Collier County of additional research or assessment options that may be available and the associated costs.

1.5 User Reliance

This Phase I ESA was prepared for the exclusive use and reliance of TPL, the Village of Estero, the City of Bonita Springs, and Collier County. The continued viability of this report is subject to ASTM E1527-21, Sections 4.6 and 4.8. If the Phase I ESA will be utilized by a different user (third party) than the one for whom the Phase I ESA was originally prepared, the third party must also satisfy the User's responsibilities in Section 6 of ASTM E1527-21 and the USEPA's AAI Final Rule, as amended. Key viability dates for this Phase I ESA are provided in Table 1.

Table 1: Key Dates for Continued Viability	
Action	Date
Historical Topographic Maps	July 1, 2026
Government Search	July 2, 2026
Historical Aerial Photographs	July 2, 2026
Fire Insurance Maps	July 2, 2026
Owner Questionnaire	June 7, 2026
Site Reconnaissance	July 9, 2026
Environmental Lien and Activity/Use Limitations Search 1980	July 20, 2026
Qualified Environmental Professional Signature	July 21, 2026

2 Site Description

2.1 Location and Legal Description

The subject property is an approximately 11.4-mile, unused railroad ROW that begins immediately south of Estero Parkway, extends south through the City of Bonita Springs, and terminates at the southern end of the Railhead Scrub Preserve in Collier County (Figures 1, and 2A through 2C). According to information obtained from the LCPA and CCPA, the subject property is comprised of sixteen parcels (see Section 1 and Appendix A). The center of the subject property has an approximate latitude and longitude of 26.370759N and - 81.802379W in Sections 02, 03, 10, 15, 22, 26, 27, 28, 33 and 35; Townships 46, 47, and 48 South, Range 25 East.

The legal description for the subject property is provided in the Commonwealth Land Title Insurance Company Title Commitment (Appendix B).

A strip of land 130 feet wide being 65 feet on each side of the center line of the Fort Myers Southern Railroad as located and constructed through the east halves of Sections 10 and 15, Township 48 South, Range 25 East, extending southerly from the North line of Section 10 Township 48 South, Range 25 East to the Northerly right of way line of Wiggins Pass Road, being in Collier County, Florida. Also being Collier County Property Appraiser's Parcel No. 00145681504.

AND

A strip of land (variable width) extending southerly from the North line of Estero Parkway in Section 21, Township 46 South, Range 25 East to the South line of Section 3, Township 48 South, Range 25 East, in Lee County, Florida as located and constructed through:

The NE 1/4 of Section 28 and the East 1/2 of Section 28, Township 46 South, Range 25 East;

The East 1/2 of Section 33, Township 46 South, Range 25 East, lying North of Corkscrew Rd and

The East 1/2 of Section 33, Township 46 South, Range 25 East, lying South of Corkscrew Rd;

The Northeast corner of Section 4, Township 47 South, Range 25 East and

The West 1/2 of Section 3, Township 47 South, Range 25 East;

The West 1/2 of Section 10, Township 47 South, Range 25 East, lying North of Coconut Road and lying South of Coconut Road;

The West 1/2 of Section 15, Township 47 South, Range 25 East;

Southeasterly through Section 22, Township 47 South, Range 25 East;

The Northeast 1/4 of Section 27, Township 47 South, Range 25 East;

Southeasterly through the West 1/2 of Section 26, Township 47 South, Range 25 East (being 100' thru the South 1/2 of Sec 26);

The West 1/2 of Section 35, Township 47 South, Range 25 East, lying North of River and the West 1/2 of Section 35, Township 47 South, Range 25 East, lying South of River, (Less that part in DB 292-458);

The West 1/2 of Section 2, Township 48 South, Range 25 East and

The Southeast 1/4 of Southeast 1/4 of Section 3, Township 48 South, Range 25 East

ALL OF THE ABOVE DESCRIBED LAND ALSO BEING DESCRIBED AS FOLLOWS:

Segment 1: Estero

A segment of the above-described strips of land lying between approximately Mile Post 979.4 and approximately Mile Post 983.5, said segment being approximately 4.1 miles long and located in Lee County.

AND ALSO:

Segment 2: Bonita Springs

A segment of the above-described strips of land lying between approximately Mile Post 983.5 and approximately Mile Post 989.3, said segment being approximately 5.8 miles long and located in Lee County.

AND ALSO:

Segment 3: Unincorporated Collier County

2.2 Site and Vicinity General Characteristics

The following site and vicinity general characteristics were obtained from the EnviroSite Radius Map Report with GeoCheck (Appendix C), the EnviroSite Historical Topographic Map Report (Appendix D), and other applicable records. Full references for all resources used in the preparation of this report are provided in Section 10.

2.2.1 Topography, Physiography, and Geology

The subject property is generally flat with an average surface elevation of 12 feet (ft) above mean sea level (AMSL; Appendices C and D).

Regional and local geology and hydrogeology were obtained from the 2007 “Site Assessment Report 7-Eleven #32597” (Facility ID: 36/9800973) located at 26975 Old U.S. Highway 41 Bonita Springs, Florida.

The geology of southwestern Florida is comprised of sedimentary rocks of the Cenozoic age. In geologic time, these rocks are of relative young age, 65 million years old to present.

The exposed landmass of southwest Florida is primarily the result of climatic fluctuations from the Pliocene age through the Pleistocene Epoch with the advances and declines in sea level 1.8 million to 8,000 years ago. The underlying limerock formations are also of more recent Cenozoic age, with the Suwannee Limestone formed in the Oligocene, 34 to 24 million years ago. These rocks are primarily carbonates (limestone) in the lower portion with elastics (sand and clay) in the upper part. The movement of groundwater from the inland areas to the Gulf occurs primarily through the carbonate rocks. In this region of Florida, the geologic units generally consist, from oldest to youngest, of the Suwannee Limestone of Oligocene age, Hawthorn Group (Arcadia and Peace River Formations [Fm]) of Oligocene to Pliocene age, Tamiami Fm of Pliocene age, and undifferentiated sediments of Holocene to Pleistocene age.

The Suwannee Limestone is composed of fossiliferous, calcarenitic limestone with minor amounts of quartz sand. The thickness of the limestone varies widely but is commonly greater than 100 meters in Lee and Collier Counties. The basal Suwannee Limestone generally contains fine-grained, phosphatic, elastic material with interbeds of micritine and clay.

The Hawthorn Group is divided into the Arcadia Fm and the Peace River Fm. The Arcadia Fm, which overlies the Suwannee Limestone, consists of fine-grained carbonate sediments, as well as sandy limestone, shell beds, dolomite, phosphatic and carbonate sand, silt and clay. The predominantly elastic Peace River Fm has a highly irregular erosional and karstic surface. The sediments of the Peace River Fm consist of interbedded, fine to coarse grained quartz sand, quartz silt, gravel, clay carbonate, and phosphatic sand. The Tamiami Fm overlies the Peace River Fm and consists of varying amounts of silt, sandy clay, micritic limestone, sandy and shelly limestone, calcareous sandstone, and quartz sand. The lithology of the Tamiami Fm varies greatly because of the complex nature of the depositional environment. The limestone is slightly phosphatic, variably sandy, and fossiliferous. The sand varies from well sorted, clean sand with abundant shells and traces of silt-size phosphate, to clayey sand with sand-size phosphate, clay-size carbonate matrix, and abundant well-preserved mollusk shells. The indifferiated sediments of Holocene to Pleistocene age overlie the Tamiami Fm at land surface. These deposits mainly consist of quartz sand with minor amounts of shell and clay, and contain limestones, sandstones, and shell beds. With increasing elevation inland, the sand becomes thicker and less calcareous. The sand varies from fine to coarse grained, non-indurated to poorly indurated, and nonclayey to slightly clayey. Included in this group are marine terrace sediments, aeolian sand dunes, fluvial deposits, freshwater carbonated, peats and clay beds.

The three main water-producing aquifers that underlay the area are the Floridan aquifer, the Intermediate aquifer system, and the Surficial aquifer system.

The Floridan aquifer system underlies an area over 100,000 square miles and is a source of water for many major cities in Florida. The recharge area for this aquifer is north-central Florida. The Floridan aquifer is comprised locally of the lower Hawthorn and Suwannee Limestone Fms. In southwest Florida, the water in this aquifer contains levels of salinity above recommended potable (drinking) water standards and requires extensive treatment for use. This aquifer is used for public water supplies in Lee County where the other shallower aquifers are not available in quantity or have been degraded by saltwater intrusion. The Intermediate aquifer system contains both the Sandstone and the Mid-Hawthorn aquifers, along with the confining basal layers that underlie each within the Hawthorn Group. The Intermediate aquifer system extends beneath a twelve-county area in southwest and west-central Florida. This system contains water that is under confined conditions; that is, the aquifer is underlain and overlaid by confining layers. This aquifer is not as productive as the Floridan, and consequently, not studied as extensively. However, it is of great significance as it is the main water supply of Lee, Charlotte, and Sarasota Counties. The Surficial aquifer system comprises two aquifers: the water table aquifer and the lower Tamiami aquifer. Throughout many areas of Lee County, these two aquifers function as one aquifer with the absence of a confining layer between them.

Site-specific geology does not exist for the subject property. General site lithology was obtained from the 2008 “Pilot Test Plan for the 7-Eleven Store No. 32597” (Florida Department of Environmental Protection [FDEP] Facility ID No. 36/9800973). The site lithology at this site was summarized as follows.

- Surface to 2 ft below land surface (bls): A mix of coarse, medium- to fine-grained, white to light brown, silica sands mixed with limestone fragments ranging from approximately 5 to 15 percent (%).
- 2 to 8 ft bls: a mix of pea gravel; fill sand; and white, tan, gray, and brown, medium- to fine-grained sands.
- 8 to 22 ft bls: clayey sand and gray and brown and light brown, medium- to fine-grained silica sands with shell fragments, in addition to weathered and compacted limestone.
- 22 to 46 ft bls: clayey sands.
- 46 to 50 ft bls: clayey sand mixed with limestone fragments.

Depth to water has ranged from approximately 6.5 to 9.5 ft bls across the site with recent depths being approximately 8 ft bls.

2.2.2 Soils

Soils data on the subject property is provided in Tables 2A (Estero), 2B (Bonita Springs), and 2C (Collier County). Also see Appendix E.

Immokalee sand-Urban land complex, 0 to 2% slopes, is the most prevalent soil unit in the Estero section of the subject property, encompassing 26.5% or 17.7 acres of the subject property.

Table 2A: Estero – Soil Resource Report		
Map Unit Name	Acres in Area of Interest	Percent of Area of Interest (%)
Immokalee sand-Urban land complex, 0 to 2 percent slopes	17.7	26.5
Felda fine sand, frequently ponded, 0 to 1 percent slopes	0.6	0.9
Floridana sand, frequently ponded, 0 to 2 percent slopes	0.5	0.7
Brynwood fine sand, wet-Urban land complex, 0 to 2 percent slopes	5.0	7.4
Pineda fine sand, frequently ponded, 0 to 1 percent slopes	0.0	0.0
Cypress Lake fine sand-Urban land complex, 0 to 2 percent slopes	2.8	4.3
Malabar fine sand-Urban land complex, 0 to 2 percent slopes	3.3	5.0
Pineda fine sand-Urban land complex, 0 to 2 percent slopes	8.2	12.3
Pineda fine sand, ponded-Urban land complex, 0 to 1 percent slopes	0.5	0.8
Pompano fine sand-Urban land complex, 0 to 2 percent slopes	3.0	4.5
Pompano fine sand, ponded-Urban land complex, 0 to 1 percent slopes	1.8	2.7
Valkaria fine sand-Urban land complex, 0 to 2 percent slopes	11.1	16.7
Cocoa fine sand-Urban land complex, 0 to 2 percent slopes	10.6	16.0
Brynwood fine sand, slough-Urban land complex, 0 to 1 percent slopes	1.4	2.2
Totals	66.5	100

Brynwood fine sand, wet-Urban land complex, 0 to 2% slopes, is the most prevalent soil unit in the Bonita Springs section of the subject property, encompassing 22.4% or 19.5 acres of the subject property.

Table 2B: Bonita Springs – Soil Resource Report		
Map Unit Name	Acres in Area of Interest	Percent of Area of Interest (%)
Immokalee-Oldsmar, limestone substratum-Urban land complex, 0 to 2 percent slopes	0.1	0.1
Matlacha gravelly fine sand-Urban land complex, 0 to 2 percent slopes	4.2	4.9
Immokalee sand-Urban land complex, 0 to 2 percent slopes	15.5	17.8
Brynwood fine sand, wet-Urban land complex, 0 to 2 percent slopes	19.5	22.4
Waters of the Gulf of America	0.2	0.3
Cypress Lake fine sand-Urban land complex, 0 to 2 percent slopes	7.5	8.6
Copeland fine sandy loam, ponded-Urban land complex, 0 to 1 percent slopes	0.9	1.1
Felda fine sand, ponded-Urban land complex, 0 to 1 percent slopes	1.3	1.5
Isles fine sand, ponded-Urban land complex, 0 to 1 percent slopes	0.8	0.9
Malabar fine sand-Urban land complex, 0 to 2 percent slopes	4.3	4.9
Myakka fine sand-Urban land complex, 0 to 2 percent slopes	3.3	3.8
Myakka fine sand, ponded-Urban land complex, 0 to 1 percent slopes	0.8	0.9
Orsino fine sand-Urban land complex, 0 to 5 percent slopes	3.2	3.6
Pineda fine sand-Urban land complex, 0 to 2 percent slopes	8.8	10.1
Pompano fine sand-Urban land complex, 0 to 2 percent slopes	0.6	0.6
Pompano fine sand, ponded-Urban land complex, 0 to 1 percent slopes	1.0	1.2
Satellite fine sand-Urban land complex, 0 to 2 percent slopes	2.9	3.3
Valkaria fine sand-Urban land complex, 0 to 2 percent slopes	11.9	13.7
Cocoa fine sand-Urban land complex, 0 to 2 percent slopes	0.3	0.3
Totals	87.1	100

Satellite fine sand-Urban land complex, 0 to 2% slopes, is the most prevalent soil unit in the Collier County section of the subject property, encompassing 34.6% or 8.4 acres of the subject property.

Table 2C: Collier County – Soil Resource Report		
Map Unit Name	Acres in Area of Interest	Percent of Area of Interest (%)
Satellite fine sand, 0 to 2 percent slopes	1.5	6.1
Basinger fine sand-Urban land complex, 0 to 2 percent slopes	4.1	16.9
Holopaw-Basinger-Urban land complex, 0 to 2 percent slopes	2.5	10.1
Immokalee fine sand-Urban land complex, 0 to 2 percent slopes	7.2	29.4
Immokalee-Oldsmar, limestone substratum-Urban land complex, 0 to 2 percent slopes	0.7	2.8
Satellite fine sand-Urban land complex, 0 to 2 percent slopes	8.4	34.6
Totals	24.3	100

2.2.3 Water Resources

The subject property transects nine Federal Emergency Management Agency panels ([FEMA] Panels 12021C0183J, 12021C0191J, 12071C0583G, 12071C0591H, 12071C0593H, 12071C0656G, 12071C0657G, 12071C0658G, and 12071C0659G; see Appendix F). Based on the length of the subject property, it transects several floodplain designations including Zone X, Zone AE, Zone AH, and Regulatory Floodways associated with several river crossings.

2.2.4 Climate

The climate in Lee and Collier Counties is humid subtropical characterized by mild and relatively dry winters and warm and wet summers. The Gulf of Mexico has a moderating influence on the maximum and minimum temperatures in summer and winter, particularly in coastal areas. Colder winter temperatures are closely tied to the advance of cold fronts emanating from the north. However, this cold continental air must pass over water and much of peninsular Florida. As such, the cold air is appreciably modified during that journey. Summer temperatures are also tempered by the shade provided by the formation of cumulus clouds and rain showers. Based on weather records from Fort Myers, Florida, the normal monthly mean temperature ranges from 63.5 degrees Fahrenheit (°F) in January to 82.8°F in August. The mean annual rainfall is approximately 54 inches with the heaviest rainfall, approximately 60%, occurring during the rainy season which extends from June to September. This is the result of afternoon and evening thunderstorms. Thunderstorms occur about 80 days per year. Tropical storms or depressions and hurricanes are often associated with part of the rainy season. The average relative humidity in mid-afternoon is 50 to 60%. At night, just before dawn, the average relative humidity is about 80% (McCarthy 2014 and 2015).

2.3 Current Use of the Property

Based upon available site history, the subject property is an unused rail line ROW corridor, constructed in the 1920s, and last used in 2008. As indicated in Section 1, fifteen of the subject property parcels are in Lee County (seven in Estero and eight in Bonita Springs) and one parcel in Collier County.

The City of Bonita Springs Community Development indicated that the parcels comprising the subject property in Lee County are designated as ROW, making the zoning category not applicable. Additionally, the City of Bonita Springs Comprehensive Plan, Policy 1.2.16 states: *“The City shall investigate railroad and electric power rights-of-way for their potential inclusion in the system of public bike paths and other ancillary recreational uses. Policies under Objective 1.6 of the Transportation Element describe the potential use of the CSX/Seminole Gulf rail corridor for hiking/biking/walking trail”*.

The Transportation components of the Village of Estero Comprehensive Plan (2018, amended in 2019) has a linkage component stating, *“Estero residents want to feel connected to their community’s parks, recreation, and centers of activity. Pathways along roadways, greenways that are away from roadways, and blueways along the Estero River are desired to link residents to these community’s assets. Opportunities to link to destinations beyond Estero along the CSX rail corridor and FPL corridor are also important,”* and further stating, *“Blueways, bikeways, pedestrian paths and use of the CSX rail corridor and FPL corridor are important and viable alternatives to traditional roadway infrastructure. Estero is committed to identifying and expanding these options where and when feasible.”*

The Collier County parcel has a property use of 91 - Utility, Gas, Electric, telephone, local. The railroad corridor transects the 135-acre Railhead Scrub Preserve. The Railhead Scrub Preserve is an imperiled endemic oak scrub habitat with dense populations of gopher tortoise (*Gopherus polyphemus*), rare plant species, and large mammal populations (e.g., bobcats [*Lynx rufus*], coyotes [*Canis latrans*], and Florida black bear [*Ursus americanus floridanus*]). An additional description of the subject property and the adjacent uses is provided in Section 5.

2.4 Descriptions of Structures, Roads, and Other Improvements on the Site

In 1922, Barron Collier and other Fort Myers businessmen formed the Fort Myers Southern Railway through a joint venture with the Atlantic Coast Line (ACL) to construct a railroad to Naples. ACL reached Bonita Springs on October 8, 1924, and western Naples on January 7, 1927. Seaboard Air Line Railway, ACL’s main competitor, had its own track through Fort Myers and constructed a line to Naples on December 7, 1926. ACL completed a line to Marco Island on June 27, 1927.

In 1967, ACL and Seaboard Air Line merged to form the Seaboard Coast Line (SCL). This merger proved beneficial to the region by eliminating the duplication of tracks and stations. However, the age

of railroad passenger service was over, replaced by improved airline service and highways, as well as the formation of Amtrak. In May 1971, SCL ended passenger service in southwest Florida. Further industry consolidation led to the 1980 merger of SCL with the Chessie System and other railroads to form CSX. In November 1987, Seminole Gulf Railway, L.P. (SGLR) acquired 118 miles of CSX track between North Naples and Arcadia, including the subject property, as well as between Oneco (Bradenton) and Sarasota.

SGLR filed a Notice with the Surface Transportation Board on June 26, 2026. SGLR filed a verified notice of exemption under 49 Code of Federal Regulations (CFR) part 1152 subpart F, Exempt Abandonments, to abandon a line of railroad from the northern ROW boundary of Estero Parkway at approximately SGLR Milepost AX 979.39 in the Village of Estero, Lee County, Florida, south through the remainder of Estero, and through the City of Bonita Springs, Lee and Collier Counties, Florida, to the corridor's terminus at the conceptual northern ROW extension of Wiggins Pass Road at approximately SGLR Milepost AX 990.80 (the Line). There are three freight stations on the Line. The Line traverses U.S. Postal Service zip codes 33928, 34134, 34135, and 34110.

SGLR has certified that: (1) no local traffic has moved over the Line since 2008; (2) there is no overhead traffic because the Line is not a through line; (3) no formal complaint filed by a user of rail service on the Line (or by a state or local government on behalf of such user) regarding cessation of service over the Line is pending with either the Surface Transportation Board or any U.S. District Court or has been decided in favor of a complainant within the two-year period prior to the filing of the notice; and (4) the requirements at 49 CFR 1105.7(b) and 1105.8(c) (notice of environmental and historic reports), 49 CFR 1105.12 (newspaper publication), and 49 CFR 1152.50(d)(1) (notice to government agencies) have been met.

Since service terminated in 2008, the railroad is overgrown and the tracks remain on the entire length of the subject property.

2.5 Current Use of Adjoining Properties

The 11.4-mile subject property transects multiple use areas in the Village of Estero, the City of Bonita Springs, and Collier County. The following describes the land or properties within the immediate vicinity of the subject property (see Table 3, and Figures 1, 2A through 2C). The information presented was primarily obtained from the LCPA, CCPA, and Google Earth Pro, and was supplemented by observations made during the July 9, 2026, site reconnaissance.

Table 3: Current Use of Adjoining Properties

Direction	Description
North	The northern terminus of the subject property is Estero Parkway. The rail line extends further north through a residential area.
East	Estero (northern section) – Most of the properties east of the subject property through Estero are residential, with many golf course neighborhoods occurring toward the southern portion of the Village. The Village of Estero is located east of the railroad off Corkscrew Road, and Estero High School is east of the railroad off Williams Road. Bonita Springs (central section) – The properties east of the subject property in the northern section of Bonita Springs are residential until the railroad crosses Old 41 Road where the eastern properties are predominantly commercial. The “old” commercial section of Bonita Springs is located east of the railroad south of Terry Street. The southern section of Bonita Springs is a golf course neighborhood. Collier (southern section) – The northern properties to the east of the railroad in Collier County are commercial/light industrial. Railhead Scrub Preserve borders the railroad to the east in the southern section of Collier County.
South	The southern railroad terminus is at the Railhead Scrub Preserve in Collier County. The Cemex Wiggins Pass North Naples Ready-Mix Concrete Plant is located immediately south of the terminus.
West	Estero (northern section) – The properties west of the subject property are residential and commercial along the South Tamiami Trail (US Highway 41) which runs parallel to the railroad in a north-south direction. Bonita Springs (central section) – The properties west of the subject property in the northern section of Bonita Springs are commercial until the railroad crosses Old 41 Road where the properties are predominantly residential. Depot Park, immediately south of the Imperial River, was the location of the former railroad depot for passenger service. Collier (southern section) – Most of the properties to the west of the subject property within Collier County are commercial/light industrial until the southernmost area which is within Railhead Scrub Preserve in Collier County.

3 User-Provided Information

3.1 Title Records

S&S did not perform a title records search as part of the preparation of this Phase I ESA; however, readily accessible property records from Lee and Collier Counties are provided in Appendix A.

- The subject property is currently owned by Seminole Gulf Railway, L.P., which acquired the property from CSX Transportation, Inc., on November 1, 2018 (Collier County Book 5568, Page 941: see Appendix A).

Additionally, TPL provided a Draft Title Commitment completed by Commonwealth Land Title Insurance Company on February 12, 2026 (see Appendix B). Commonwealth Land Title Insurance Company indicated that the Title is, at the Commitment Date, vested in: Seminole Gulf Railway, L.P., a Delaware limited partnership and as disclosed in the Public Records, has been since November 2, 2018, in Collier County, Florida and November 7, 2018, in Lee County, Florida.

3.2 Environmental Liens or Activity and Use Limitations

S&S tasked Envirosite Corporation (Envirosite) to perform an environmental lien and activity/use limitations (AULs) search (see Appendix G). Envirosite searched records from Lee and Collier Counties back to 1980 in compliance with ASTM E1527-21.

Envirosite did not identify any environmental liens for any of the subject property parcels.

Envirosite identified the following activity/use limitations (AULs) for the subject property parcels

Land Use Restrictions as recited in Quit Claim Deed recorded 11/2/2018 in OR Book 5568 Page 941.

and

Land Use Restrictions as recited in Confirmatory Quit Claim Deed recorded 6/26/2019 in OR Book 5645 Page 3121.

S&S reviewed the most recent deed which has a deed restriction for the parcels that form the subject property:

Grantee acknowledges that the Land conveyed hereunder has been historically used for railroad industrial operations and other uses and is being conveyed for use only as industrial, commercial or non-residential property, Grantee, by acceptance of this deed, hereby covenants that it, its successors, heirs, legal representatives or assigns shall not use the Land for any purpose other than industrial or commercial purposes, and that the Land will not be used for (a) any residential purpose of any kind or nature (residential use shall be defined broadly

*to include, without limitation, any use of Land by individuals or families for purposes of personal living, dwelling, or overnight accommodations, whether such uses are in single family residences, apartments, duplexes, or other multiple residential dwellings, trailers, trailer parks, camping sites, motels, hotels, or any other dwelling use of any kind), (b) any public or private school, day care, or any organized long-term or short-term child care of any kind, (c) **any recreational purpose (recreational use shall be defined broadly to include, without limitation, use as a public park, hiking or biking trail, athletic fields or courts, or public gathering place),** (d) any agricultural purpose that results in, or could potentially result in, the human consumption of crops or livestock raised on the property (agricultural purpose shall be defined broadly to include, without limitation, activities such as food crop production, dairy farming, livestock breeding and keeping, and cultivation of grazing land that would ultimately produce, or lead to the production of, a product that could be consumed by a human or (e) establishment of a mitigation bank and/or the sale, lease, license, conveyance or in any way distribution of mitigation credits (collectively the “Environmental Use Restrictions”). Notwithstanding the foregoing, the above restrictions shall not apply to any uses of the Land pursuant to occupancy agreements with Grantee at the time of conveyance from Grantor to Grantee. By acceptance of this deed, Grantee further covenants that it, its successors, heirs, legal representatives or assigns shall not use the groundwater underneath the Land for human consumption, irrigation or other purposes.*

3.3 Specialized Knowledge

Mr. Robert H. Fay, Executive Vice President, Seminole Gulf Railway, L.P., confirmed that the subject property was historically undeveloped prior to the construction of the railroad in the 1920s. Mr. Fay also stated that there was a deed restriction on the future use (see Appendix H and Section 3.2). Neither the current owner nor the Users, provided any specialized knowledge or information pertaining to the presence of RECs, CRECs, and HRECs in connection with the subject property (see Appendix H).

3.4 Commonly Known or Reasonably Ascertainable Information

Representatives for the current owner did not provide S&S with commonly known or reasonably ascertainable information regarding the presence of RECs, CRECs, and HRECs in connection with the subject property (see Appendix H).

3.5 Valuation Reduction for Environmental Issues

S&S did not perform a valuation reduction for environmental issues as part of this Phase I ESA. According to Mr. Doug Hattaway, Southeast Region Conservation Director, TPL, the purchase price

reflects fair market value. As a rail corridor with historic industrial use, contamination is expected, which can be addressed through a soil management plan with capping. The corridor is inactive and all parties have negotiated a purchase price that will ensure project success for a rail-to-trail conversion to support public use and the local economy.

3.6 Owner, Property Manager, and Occupant Information

According to information obtained from LCPA and CCPA, the subject property is owned by SGLR, who acquired the property from CSX (see Appendix A). The entire 11.4-mile section is currently not in use and mostly overgrown.

3.7 Reason for Performing ESA

This Phase I ESA was performed for TPL, the Village of Estero, City of Bonita Springs, and Collier County to support the acquisition of the unused railway line for trail conversion to support public use and the local economy.

4 Records Review

4.1 History of Railroads in Southwest Florida

In 1885, the Florida Southern Railroad began construction of the first rail line from Arcadia to Punta Gorda. By March 1886, the railbed was finished and the first train operated into Punta Gorda on July 24, 1886. This line was originally built as a 3-foot narrow gauge. The tracks were widened to standard gauge (4 feet, 8.5 inches) on December 17, 1892.

The extension from Punta Gorda to Fort Myers was built by ACL. Construction began shortly after the ACL purchased the Plant System and Florida Southern Railroads in 1903. The first locomotive crossed the Caloosahatchee River on February 2, 1904. Nine days later, the tracks reached Fort Myers city limits and scheduled passenger services began May 10, 1904.

In 1922, Barron Collier and other Fort Myers businessmen formed the Fort Myers Southern Railway as a joint venture with ACL to construct a railroad to Naples. The company reached Bonita Springs on October 8, 1924, and western Naples on January 7, 1927. ACL's main competitor, the Seaboard Air Line Railway, which had its own track through Fort Myers, also constructed a line reaching Naples on December 7, 1926. ACL completed a line to Marco Island on June 27, 1927.

In 1967, ACL and Seaboard Air Line merged into one company, SCL which proved beneficial to rail travel within the region by eliminating duplicate tracks and stations. However, the age of railroad passenger service was over, replaced by improved airline service and highways as well as the formation of Amtrak. SCL ended passenger service in southwest Florida in May 1971. In 1980, SCL merged with the Chessie System and other railroads to form CSX. In November 1987, SGLR acquired 118 miles of CSX track between North Naples and Arcadia, including the subject property, and between Oneco (Bradenton) and Sarasota.

4.2 Standard Environmental Record Sources

4.2.1 Environmental Database Search Findings

S&S tasked Envirosearch to perform a search of reasonably ascertainable government and tribal records. Envirosearch conducted a site records search compliant with the requirements of ASTM E1527-21 "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process" and the USEPA's "Standards and Practices for All Appropriate Inquiries" (40 CFR Part 312), which included searching a prescribed array of federal, state, local, and tribal databases. The purpose of Envirosearch's environmental database search was to identify the available (reasonably ascertainable) government and tribal records for mapped facilities/sites either on the subject property or within the prescribed search radius as defined by ASTM. The complete online Envirosearch environmental database search is provided in Appendix C. In addition to the search conducted by Envirosearch, S&S completed a site search using the FDEP Contamination Locator Map and the FDEP Storage Tanks and Contamination Monitoring Map.

The Envirosearch Government Records Report identified approximately 170 environmental sites and/or addresses (including the subject property) within the ASTM-defined radius of the subject property (see Appendix C). Given the large number of sites identified in the ASTM database search, the table detailing these sites is provided in Appendix C. The subject property is located in a mixed-use area of Lee and Collier Counties. The following provides a summary of the current status of those sites with known environmental investigations identified in proximity to the subject property.

- The Corkscrew Energy, LLC site (FDEP Site # 36/9806315) is located at 8800 Corkscrew Road in Estero. In 2011, a limited site assessment report (LSAR) was completed for the 2007 spill bucket discharge. Based on the findings of the LSAR the contractor recommends no further soil or groundwater assessment. On June 17, 2011, FDEP agreed with the recommendation and issued a Site Rehabilitation Completion Order (SRCO). This closed site would have no impact on the subject property.
- Palmer Cablevision of SW Fl Inc (FDEP Site # 36/8627269) is located at 26790 Old 41 Road in Bonita Springs. The Underground Storage Tank (UST) was removed in 1990 and in 1991 soil contamination was detected in the area of the former tank. An SRCO was issued in 1999 and the wells were abandoned in 2011. This closed site would not have any impact on the subject property.
- The Tisch Coin Laundry site (USEPA Resource Conservation and Recovery Act [RCRA] ID No. FLD981859820) is located at 10450 West Terry Street in Bonita Spring, immediately east of the subject property. Tisch Coin Laundry is currently an active laundromat (known as Tisch Laundry and Dry Cleaning), but historically, it also conducted drycleaning operations. Investigations conducted by FDEP and USEPA in 1999 indicated the facility discharged wastewater into two percolation ponds located south of the facility. Subsequent FDEP and USEPA investigations revealed drycleaning solvents had been discharged into the percolation ponds.

USEPA issued a Consent Agreement and Final Order (Docket No: RCRA-04-2000-12) on June 1, 2001, requiring the submittal of a Closure Plan to adequately assess and remediate the contamination identified on the property. The Closure Plan was received on October 15, 2007. Pursuant to the Closure Plan, the percolation ponds and associated soils were removed from the site. According to a 2024 Compliance Evaluation Inspection conducted by FDEP, approximately 292 tons of hazardous waste soil and 820 tons of non-hazardous waste soil were excavated. Soil removal and subsequent groundwater assessment activities were completed in 2010.

A Long-Term Groundwater Monitoring Plan (LTGWMP) was approved by FDEP and USEPA in 2012. The LTGWMP consists of biennial sampling of four long-term monitoring wells (LTMWs) in odd years for volatile organic compounds via USEPA Method 8260B. In addition to water quality analyses, water level data is collected for determination of potentiometric groundwater flow direction at the site.

According to the 2023 Groundwater Monitoring Report, groundwater samples were collected from all four LTMWs on November 17, 2023. Results indicated most of the monitored constituents showed a general decreasing trend since biennial monitoring began in 2013. However, concentrations of daughter products of trichloroethene and/or tetrachloroethene degradation (notably cis-1,2-dichloroethene and vinyl chloride) continue to significantly exceed Florida Groundwater Cleanup Target Levels and Florida Natural

Attenuation Default Concentrations at source area and downgradient wells. The report for the November 2023 groundwater monitoring event recommended continuation of groundwater monitoring with the next event scheduled in November 2025. The 2025 data was not available from the FDEP OCULUS database.

The available site file indicates that USEPA attempted to gain access to the railroad in 2013 to install temporary monitoring wells on the railroad ROW to further delineate groundwater contamination to the west. Site access was declined and the monitoring wells were never installed. S&S contacted the USEPA Region IV site manager, Mr. Brian Bastek, to obtain the most recent information pertaining to the Tisch site. Mr. Bastek could not provide any additional information but commented that he did not believe there would be chlorinated solvent source on the railroad ROW. He did state that groundwater beneath the railroad ROW could be contaminated with drycleaning solvents attributable to the Tisch Laundry site.

The Bonita Springs Fire Control & Rescue (FDEP Site # 36/8627258) is located at 27490 Old 41 Road in Bonita Springs. After remedial and assessment activities were completed, FDEP issued an SRCO in October 2020 for the 1993 petroleum discharge at this site. This site would not have any impact on the subject property.

- The Naples Tomato Growers site (FDEP Site # 11/8518313) is located at 15000 Old 41N in Collier County. Review of the available site file indicates that a discharge reporting form was submitted to FDEP in 1990. The site received a No Further Action Order on May 10, 1991. This closed site would not have any impact on the subject property.
- The Cemex-Wiggin Pass Ready-Mix, Block and Paver site (FDEP Site # 11/8518892) is located at 1425 Wiggins Pass Road East. A Site Assessment Report (SAR) and No Further Action Proposal (NFAP) was submitted to FDEP in May 2016 for the 1992 and 1993 discharges. FDEP reviewed the SAR/NFAP request and issued an SRCO on February 24, 2017. This closed site would not have any impact on the subject property.

S&S reviewed the location and the current regulatory status of the sites listed in the Envirosearch database search (see Appendix C). It is noted that many of the listed sites store or use hazardous materials or petroleum products. However, except for Tisch Laundry, it is our opinion that the sites listed in the Environmental Database Search table and described above would not have a likely impact on the subject property.

4.2.2 Contaminants of Emerging Concern

According to the USEPA, Contaminants of Emerging Concern are increasingly being detected at low levels in ground and surface water. There is concern that these compounds may have an impact on human health and the environment. On July 8, 2024, the USEPA designated two polyfluoroalkyl substances (PFAS)—perfluorooctanoic acid and perfluorooctane sulfonic acid, including their salts and structural isomers—as “hazardous substances” under CERCLA.

Envirosearch conducted a search of the publicly available PFAS databases, identifying six facilities in the PFAS Industry database, which are sites where regulators and the public have expressed interest in knowing which regulated entities may be using PFAS (see Appendix C). These facilities include Goodcat LLC, Earth Supplied Products LLC, Etura Corp., MOOG, Inc., March Performance, Inc., and Bonita Springs Utilities

Wastewater Treatment Plant (WWTP)/Water Reclamation Facility. None of these facilities are listed on the FDEP Environmental Restoration Integrated Cleanup (ERIC) PFAS database indicating any ongoing investigative activities. Additionally, the subject property transects several areas of commercial/light industrial facilities that are likely to use materials containing PFAS.

4.2.3 Unmappable Sites

Unmappable orphan sites are sites with poor or inadequate address information that cannot be mapped. The Envirosearch did not identify any unmappable sites.

4.3 Physical Setting Sources

The most recent topographic data were obtained from the Environmental Systems Research Institute, United States Geological Survey (USGS), and the Envirosearch government records report (Appendix C). Historical topographic maps are provided in Appendix D.

4.4 Historical Use Information

S&S reviewed the following historical sources to develop a history of the previous uses of the subject property and surrounding area to assist with identifying the past uses for indications of RECs. S&S tasked Envirosearch to perform a search of reasonably available historical USGS topographic maps, historical aerial photographs, and historical fire insurance maps. These maps and photos were reviewed to evaluate land development and obtain information concerning the history of development on and near the subject property. Reviewed historical topographic maps, aerial photographs, and Sanborn Maps are summarized below.

4.4.1 Aerial Photographs from 1944 through 2023

Historical aerial photographs from 1944 through 2023 from Envirosearch's Historical Aerial Photo Report (Appendix I) were reviewed to identify historical uses on the subject property and the surrounding area. The findings of the historical aerial review are summarized in Table 4.

Table 4: Aerial Photographs	
Direction	Comments
Subject Property	The subject property appears as a rail ROW in all reviewed historical aerial photographs (1944–2023). Due to the extent of the historical aerial photographs, it is difficult to discern years of operation.

Table 4: Aerial Photographs	
Direction	Comments
North	Estero (northern section) – The areas north of the subject property are mostly out of the extent of all reviewed historical aerial photographs (1944–2023). From what is visible, this area appears mostly undeveloped until the 1999 historical aerial photograph, which showed a roadway traveling west to east, and the 2007 historical aerial photograph, which showed single-family residential development. Bonita Springs (central section) – In all reviewed historical aerial photographs (1944–2023), the areas north of the subject property within this segment are a continuation of the rail line ROW corridor. Due to the extent of the historical aerial photographs, it is difficult to discern years of operation. Collier County (southern section) – In all reviewed historical aerial photographs (1944–2023) the areas north of the subject property within this segment are the continuation of the rail line ROW corridor. Due to the extent of the historical aerial photographs, it is difficult to discern years of operation.
East	Estero (northern section) – Earliest historical aerial photographs (1944–1950) show areas east of the subject property as primarily undeveloped with wetlands visible. Only a small portion along the Estero River is developed, likely for agricultural purposes with a grid pattern observed. In the 1958 historical aerial photograph, an expansion of agricultural land is observed in the northern portion with row crops visible and a reduction in canopy cover within the southern portion. In the 1969 historical aerial photograph, sparse residential development is observed and by the 1978 historical aerial photograph, another expansion of agricultural land is along the northern boundary of the subject property. By the 1995 historical aerial photograph, there is a large increase in development within the northern portion, with single-family residential development surrounding what appears to be manmade ponds. Residential development is observed in the southern portion within the 1999 historical aerial photograph and by the 2007 historical aerial photograph this appears as a golf course surrounded by single-family homes and numerous ponds likely for stormwater retention. The northern area is also dominated by high-density single-family residential development with ponds, likely for stormwater retention, by the 2007 historical aerial photograph. No other significant changes are observed in all other historical aerial photographs (2010–2023) reviewed. Bonita Springs (central section) – The earliest historical aerial photographs (1944–1950) depict the areas east of the subject property as mainly undeveloped with wetlands visible. A small portion in the middle of this segment is slightly developed along a grid network of streets. Imperial River is also visible running east to west. While the northern portion remains largely undeveloped with some minimal road development from the 1958 to 1978 historical aerial photographs, the middle to southern portion continues to grow along a grid network with agriculture visible on the outer extents beginning on the 1969 historical aerial photograph. The 1971 to 2015 historical aerial photographs show primarily residential development continuing to gradually increase into a high-density residential area. No other significant changes are observed in all other reviewed historical aerial photographs (2019–2023). Collier County (southern section) – The areas east of the subject property remain largely undeveloped in the earliest historical aerial photographs (1944–1958) with Old 41 Road extending northeast of the subject property and continuing southwest. In the 1969 historical aerial photograph, minimal development is depicted with land being used primarily for agricultural purposes further east. Beginning in the 1978 historical aerial photograph, more development occurs with the construction of a golf course and continues to grow through the 1980 historical aerial photograph. By the 1995 historical aerial photograph there appears to be some development directly adjacent to the subject property which can be discerned as being for commercial use in the 1999 historical aerial photograph. No agricultural land exists within the 2007 historical aerial photograph; rather, this land is dominated by golf courses surrounded by single-family residences. No other significant changes are observed in all other reviewed historical aerial photographs (2010–2023).

Table 4: Aerial Photographs

Direction	Comments
South	Estero (northern section) – In all reviewed historical aerial photographs (1944–2023), the areas south of the subject property within this segment are the continuation of the rail line ROW corridor. Due to the extent of the historical aerial photographs, it is difficult to discern years of operation. Bonita Springs (central section) – In all reviewed historical aerial photographs (1944–2023), the areas south of the subject property in this segment are the continuation of the rail line ROW corridor. Due to the extent of the historical aerial photographs, it is difficult to discern years of operation. Collier County (southern section) – Areas south of the subject property appear undeveloped in the earliest historical aerial photographs (1944–1958) until the 1969 historical aerial photograph when what appears to be a single-family residential neighborhood is being developed southeast of the subject property. Gradual growth continues until the 1995 historical aerial photograph when a substantial growth in development can be seen south of the subject property becoming a high-density residential area. No other significant changes are observed in all other reviewed historical aerial photographs (1999–2023) as areas south of the subject property remain residential.
West	Estero (northern section) – In the earliest historical aerial photographs (1944–1950), areas west of the subject property appear mostly undeveloped with some agricultural land. Estero River is visible running east to west near the northern portion of the subject property. South Tamiami Trail is also visible in the northern portion and appears to expand to the southern portion by the 1958 historical aerial photograph. Beginning in the 1969 historical aerial photograph, residential development is observed in the northern portion which appears to develop gradually until the 1995 historical aerial photograph when a significant increase in development is observed. Large agricultural properties remain in the 1999 historical aerial photograph along the subject property's boundary in the northern portion with areas west of South Tamiami Trail being further developed with what appears to be manmade ponds. By the 2007 historical aerial photograph, single-family residential development is depicted surrounding these ponds along with a large commercial development along the boundary of the subject property's southern portion. No other significant changes are observed in all later reviewed historical aerial photographs (2010–2023) with residential and commercial development remaining the prominent use west of the subject property. Bonita Springs (central section) – The areas west of the subject property appear as largely undeveloped with wetlands and only a few unimproved roads visible in the earliest historical aerial photographs (1944–1950). In the 1958 historical aerial photograph, South Tamiami Trail is visible extending north to south. Portions of land being used for agricultural purposes are depicted too. Portions of these are visible as row crops in the 1969 historical aerial photograph. Beginning with the 1969 historical aerial photograph, development expands near the central portion of this segment. Development, particularly residential, continues to gradually expand until the 2007 historical aerial photograph with what appears to be manmade ponds and golf courses. The northern portion of this segment experiences a significant increase in residential development by the 1995 historical aerial photograph and continues to grow through the 2007 historical aerial photograph. No other significant changes are observed in all later reviewed historical aerial photographs (2010–2023). Collier County (southern section) - The areas west of the subject property remain largely undeveloped in the earliest historical aerial photographs (1944–1958) with Old 41 Road extending from the northeast and continuing southwest. In the 1969 historical aerial photograph, there is development along the subject property's western boundary. This development appears to expand by the 1978 historical aerial photograph and what appears to be high-density residential development begins just west of the subject property's southern boundary. This residential development continues to expand through the 1995 historical aerial photograph. Commercial development near the subject property's western boundary appears to increase through the 1999 historical aerial photograph. No other significant changes are observed in all later reviewed historical aerial photographs (2010–2023).

None of the available historical aerial photographs identified additional sites or sources of concern that were not identified in other historical resources.

4.3.2 Topographic Maps from 1958 through 2025

Topographic data from 1958 through 2025 were obtained from Envirosite’s “Historical Topographic Map Report” (Appendix D). The findings of the historical topographic map review are summarized in Table 5.

Table 5: Topographic Maps	
Direction	Comments
Subject Property	The subject property appears as an active railroad ROW in the earliest historical topographic maps (1958–1958, revised 1972); the available topographic maps do not show specifically when operations ceased, however it appears they have by the 1958, revised 1987, interlocal topographic map. The subject property is depicted as the Atlantic Coast Line and then the Seaboard Coast Line.
North	Estero (northern section) – The area north of the subject property appears mostly undeveloped in the 1958 historical topographic map with what appears to be the beginning of a neighborhood, with only a few structures depicted, slightly north of the subject property. Several lakes are visible within this area, including Pine Lake, Cedar Lake, Spruce Lake, Rose Apple Lake, and Lily Lake. There is only a slight increase in homes visible in the 1958, revised 1972, historical topographic map, however, by the 1958, revised 1987, historical topographic maps an expansive residential area appears to be located between Alico Road and the subject property. This area appears highly developed by the 2012 historical topographic map with San Carlos Park, Three Oaks, and Miromar Lakes identified, in addition to several golf courses. In the 2015 historical topographic map, Florida Gulf Coast University is depicted northeast of the subject property. Despite extensive development, the 2025 historical topographic map depicts some remaining marshes directly north of the subject property. What appears to have been a northern continuation of the subject property, when in operation, is labeled as the Atlantic Coast Line in the 1958 historical topographic map, the Seaboard Coast Line in the 1958, revised 1972, historical topographic map, and by the 1958, revised 1987, historical topographic map, it remains present but no longer labeled. Bonita Springs (central section) – The area north of this portion of the subject property is a continuation of the subject property in Estero. It is labeled as the Atlantic Coast Line in the 1958 historical topographic map, the Seaboard Coast Line in the 1958, revised 1972, historical topographic map. By the 1958, revised 1987, historical topographic map, it remains present but no longer labeled. Collier County (southern section) – The area north of this portion of the subject property is a continuation of the subject property in Bonita Springs. It is labeled as the Atlantic Coast Line in the 1958 historical topographic map, the Seaboard Coast Line in the 1958, revised 1972, historical topographic map, and by the 1958, revised 1987, historical topographic map, it remains present but no longer labeled.