

Jetta Point Park Business Case for Preservation

Prepared by Elliot Griffin on July 20, 2026 with input from concerned residents of Seminole County, FL and reinforced by 1,855 signatures opposing development of Jetta Point Park
www.change.org/jettapoint.

Summary of investments, cost avoidances and potential revenues:

1	(\$6,373,811)	Existing taxpayer investment to be protected
2	(\$10,000)	Future expense to reforest northern 10 acres
3	(\$112,500)	Future County administration expense of passive park
4	\$6,020,000	Cost avoidance flood liability
5	\$3,225,000	Cost avoidance lost tax revenue due to flood depreciation
6	\$2,904,000	Cost avoidance new flood infrastructure
7	\$1,200,000	Cost avoidance County hurricane expenses
8	\$800,000	Potential revenue from FWC Tortoise Donor Program
9	\$412,500	Potential tax revenue homes with adjacent passive park
10	\$300,000	Potential FDEP Resilient Florida grant
11	\$10,000	Potential FDACS Future Forest grant
	\$8,375,189	Potential net gain
	\$14,749,000	Potential future net position if past spending ignored

Calculations/Sources:

1. \$6,373,811 Cost Analysis Report, Response to Request for Additional Information Seminole County, Florida- Petition for Waiver OGC No.: 16-1342 Submitted By: Seminole County November 4, 2016
2. Reforestation means planting new native pines and palmettos as sustainable, deep-rooted erosion resistance means to slow, distribute and absorb stormwater. Reforestation of 10 acres will supplement the existing 35 acre forest on Jetta Point Park. Forest also provides clean water, clean air, cooling, recreation, and biodiversity. See Figure 1.

Reforestation Estimated Cost Breakdown

Activity	Estimated Cost per Acre	Total for 10 Acres
Site Preparation (<i>e.g., removal invasive plants, mulching</i>)	(\$200 - \$400)	(\$2,000 - \$4,000)
Seedlings (<i>Longleaf pine, palmettos</i>)	(\$100 - \$200)	(\$1,000 - \$2,000)
Planting Labor (<i>Hand planting</i>)	(\$200 - \$400)	(\$2,000 - \$4,000)
Total Reforestation Cost	(\$500 - \$1,000)	(\$5,000 - \$10,000)

3. Future County administration passive park of 45 acres x \$500/acre x 10 years forestation period = \$112,500 (conservatism considering 35 acres currently forested and volunteer potential).

- Passive implies: no additional parking or facilities, and a dirt trail using existing abandoned power easements and Jetta Point Road.
- Current tractor mowing cost unknown, estimation: 10 acres x \$100/acre x twice annually x 10 years = \$20,000 which could be completely avoided or replaced by expense of weeding new developing forest and dirt trail.
- Existing Black Hammock Trailhead and facilities would not be impacted by passive use: parking lot, restroom, water fountain, benches, trash cans, gazebos, and kiosks.

4. Cost of avoiding flood liabilities.

Statement of risk and involvement:

- Hurricanes Ian in 2022 and Fay in 2008 deposited 16 inches of rain in Seminole County.
- In Florida, retention ponds are designed to capture the first 1.25 inches of stormwater runoff from impervious surfaces (per F.A.C. 62-25), clearly insufficient to mitigate hurricane stormwater runoff. We observe retention ponds overflow during strong hurricanes. When insufficient ponds are designed to flood in hurricanes, they should only be allowed downhill of private property.
- FEMA flood maps don't reflect reality. See Figure 2 taken from [FEMA Flood Map Service Center | Welcome!](#) Eagle's Watch is not in a flood zone, yet has reported flooding.
- Howell Creek Watershed Management Plan Update CIP No. 02207094 (Seminole County BCC Districts 1, 2, 3, and 4) updated the 100-year inundation maps to supplement existing FEMA products and/or support the amendment of current FEMA maps. See Figure 3 for a section of the Ardurra 100 year-24 inundation zone: [task-7 1-report---draft---19aug2025 compressed part1.pdf](#).
- Potential commercial development of Jetta Point Park:
 - 2.5 acres (125 room hotel) of impervious surfaces will generate 1 million gallons of water from 16 inches of rain.
 - 10.5 acres (280 unit apartment complex) of impervious surfaces will generate 4.5 million gallons of water from 16 inches of rain.
- The impervious Cross Seminole Trail (~40' at Jetta Point Park) and parallel swales convey runoff toward downhill residential properties, including: Eagle's Watch (~35'), Howell Creek Reserve (~30'), and Tuskawilla (~28') homesites.

- Storm water moves to lower elevation, which is Howell Creek (14') and Lake Jessup (0'), and moves faster over smooth surfaces.
- Potential commercial development of Jetta Point Park will require impervious hardscape connecting 417, 434, and Cross Seminole trail. See Figures 4 & 5.
- Such government infrastructure (connecting roads) will efficiently convey additional water toward downhill residential properties.
- Zoning and permitting of such potential roads involves the County and/or State in the potential risk of stormwater conveyance from public property toward private property/residential properties.

Statement of just compensation:

- Private property owners made respective past purchases with FEMA flood maps available at the time. Flood zones will widen as more impervious surfaces are added to uphill areas.
- Flood insurance premiums for affected private properties impacted by the zoning and permitting of commercial real estate and public infrastructure (roads and stormwater management) required to access such property is just compensation.
- Omitted for conservatism: legal expenses, insurance premium increases, insurance deductibles, damages (out of pocket homeowner expenses), and market value of taken property.
- Required flood insurance premiums could potentially reach \$6,020,000 considering \$700/policy x 50 years of the following 172 private properties within the predicted Ardurra 100 year / 24 hour inundation model result:
 - Eagle's Watch: 110 homes
 - Vistawilla Drive: 17 homes
 - Seneca Boulevard: 11 homes
 - Grizzly Court: 6 homes
 - Wildcat Court: 7 homes
 - Cougar Court: 8 homes
 - Woodchuck Court: 13 homes

Inverse condemnation is a claim when the government essentially "takes" or destroys the value of private property for a public use. Government is financially responsible for infrastructure which fails to maintain the value of downhill residences used for floodwater mitigation from uphill public projects. Examples:

- [Volusia County homeowners sue over stormwater mismanagement, floods](#)
- [Courts have ruled that flooding from public projects can trigger compensation.](#)
- [ASSOCIATES OF MEADOW LAKE INC v. CITY OF EDGEWATER \(1998\) | FindLaw](#)

5. Whole life cost avoidance of new flood mitigation infrastructure is sum of initial investment estimated by Ardurra at \$1,404,000 in addition to estimated maintenance costs of \$30,000/year x 50 years of \$1,500,000 = \$2,904,000 total.

The 2025 Ardurra Howell Creek Watershed Management Plan Update Task 7.1 - Draft Report, August 2025 (DRAFT Version 1) recommends to construct a positive outfall from Jetta Point Tract to wetlands directly connected to Bear Creek. See Figure 6 [task-7_1-report---draft---19aug2025_compressed_part1.pdf](#).

- Ardurra concept conveys water into a floodzone reflected by both FEMA map and Ardurra model result for 100 year / 24 hour inundation.
 - When conveyance sink capacity is exceeded, flow is expected to pass beneath Vistawilla Dr, into [Bear Creek](#), beneath east Northern Way bridge, and eventually into [Howell Creek](#) at the Bear Creek Nature Trail area, beneath the west Northern Way bridge, beneath the Howell Creek trestle bridge, and into Howell Creek. This long and tortuous path involves significant public infrastructure and private property.
 - Residential wetlands located in current FEMA flood zone is of questionable validity as an effective sink for rapid infiltration of stormwater.
 - Vistawilla Drive Bridge (culvert) has limited capacity for higher flow.
 - Proposed construction of conveyance is within 660' of active bald eagle nests SE004 and SE100 and directly over active gopher tortoise burrows. See Figures 7 and 8.
 - Ardurra cites model uncertainties and disruptions to use of Cross Seminole Trail during construction.
 - Reference: [Whole life costing for sustainable drainage](#)
6. Potential lost tax revenue due to flood depreciation assuming 5% loss of home values with flood history or increased potential risk of flooding.
- 172 properties x average assessed value greater than \$150,000 x 5% depreciation for flood risk would potentially total \$1,290,000 in lost property value.
 - Assuming a millage rate of 5% for County x \$1,290,000 x 50 years = \$3,225,000
 - Assuming a millage rate of 2.5% for City x \$1,290,000 x 50 years = \$1,612,500
7. Cost avoidance Seminole County major hurricane expenses.
- Relevant examples correlated to increased runoff flow: repair of erosion of Cross Seminole Trail, repair of Howell Creek trestle bridge foundation, repair of Northern Way bridges, maintenance of swales, drains and ponds impacted by erosion and storm debris, Howell creek debris removal.
 - Historical itemized expenses for subject area not available.

- Winter Springs population / Seminole County population = 8%
 - 8% of \$15,000,000 total Seminole County 2022 Hurricane Ian related expenses = \$1,200,000.
 - Hurricane Ian affected Winter Springs more than other cities, only second to Unincorporated areas, in number of impacted properties. [Florida's Seminole County experiences millions in Hurricane Ian damage - Orlando Business Journal](#)
8. Potential revenue from FWC tortoise donor site
- 80 tortoises x \$10,000/tortoise = \$800,000 total.
 - Jetta Point currently has at least 26 active burrows occupying over 26 dry inhabited acres, satisfying the minimum requirements for FWC donor site. See Figure 8.
 - Tortoises typically live 40-60 years, are “keystone species” which support 350 other species, and can simultaneously inhabit four or more burrows at a time.
 - Program limit is 4 tortoises per acre x 26 acres = 104 tortoises, with 80 additional tortoises estimated to be received with fees paid by developers, due to rapid development of Florida. [Gopher Tortoise | FWC](#)
 - Reforestation will enhance current gopher tortoise habitat. Several of the existing plant species, and especially the prickly pear cactus, furnish excellent food resources for the gopher tortoise.
9. Potential gain tax revenue from residential property with adjacent passive public park / greenspace with walking trail. Properties located within walking distance, e.g. within a half a mile of such a park command a baseline price premium of 5% or more. Considering only the 110 home neighborhood of Eagle’s Watch with average assessed taxable value greater than \$150,000: 110 homes x \$150,000 x 5% appreciation x 50 years x 5 % County millage rate = \$412,500.
10. FDEP Resilient Florida Program grant, Howell Creek stormwater management project.
- September 1, 2026 application deadline.
 - The [UCF Stormwater Academy](#) is available to enhance proposals for FDEP Florida Resilience grants.
 - Average amount of FY25/26 active projects is approximately \$300,000.
 - No cities in Seminole County have FY25/26 active projects.
 - Identification of candidate sites of floodwater rapid infiltration ponds upstream or downstream of Howell Creek Trestle
 - Alternate concept study for conveyance of runoff from Vistawilla Drive flood zone directly toward Howell creek
- <https://floridadep.gov/rcp/resilient-florida-program/content/resilient-florida-grants>
11. Grant to offset costs of reforestation of ~10 acres in north section, see Figure 1. [Florida's Future Forests Program - Florida Department of Agriculture & Consumer Services](#)

Reference elevations, taken from Google Earth:

417 overpass of the Cross Seminole Trail:	75'
Cross Seminole Trail beneath 417:	55'
417 overpass of 434:	50'
434 near Jetta Point Park:	40'
Cross Seminole Trail south of Howell Creek Reserve:	38'
Eagle's Watch Streets:	35'
Cross Seminole Trail bridge over Howell Creek:	30'
Howell Creek Reserve Streets:	30'
434 crosses Howell Creek:	15'
Lake Jessup:	0' (100 year flood level 8.7')



Figure 1: Proposed 10 acre area of reforestation: current vs 1995

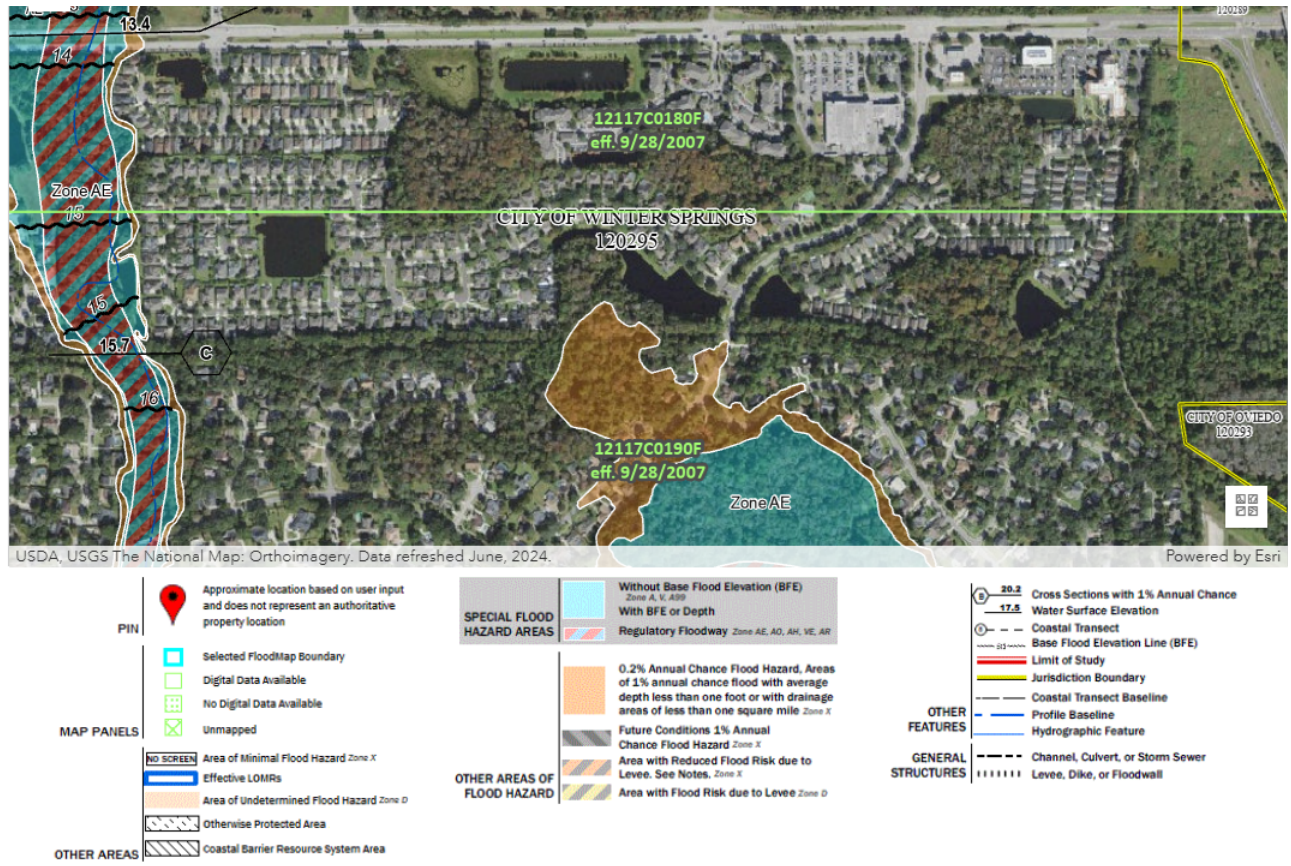


Figure 2: FEMA map zoomed in on subject area

Figure 4-3 - Modeled 100-Year/24-Hour Flood Inundation Comparison to Effective FEMA Flood Zones



Figure 3: Detail of 2025 Ardurra Howell Creek Watershed Management Plan Update Task 7.1 - Draft Report, August 2025 (DRAFT Version 1)



Figure 4: Past commercial vehicle access was via 434 east to 417 south on-ramp turn lane

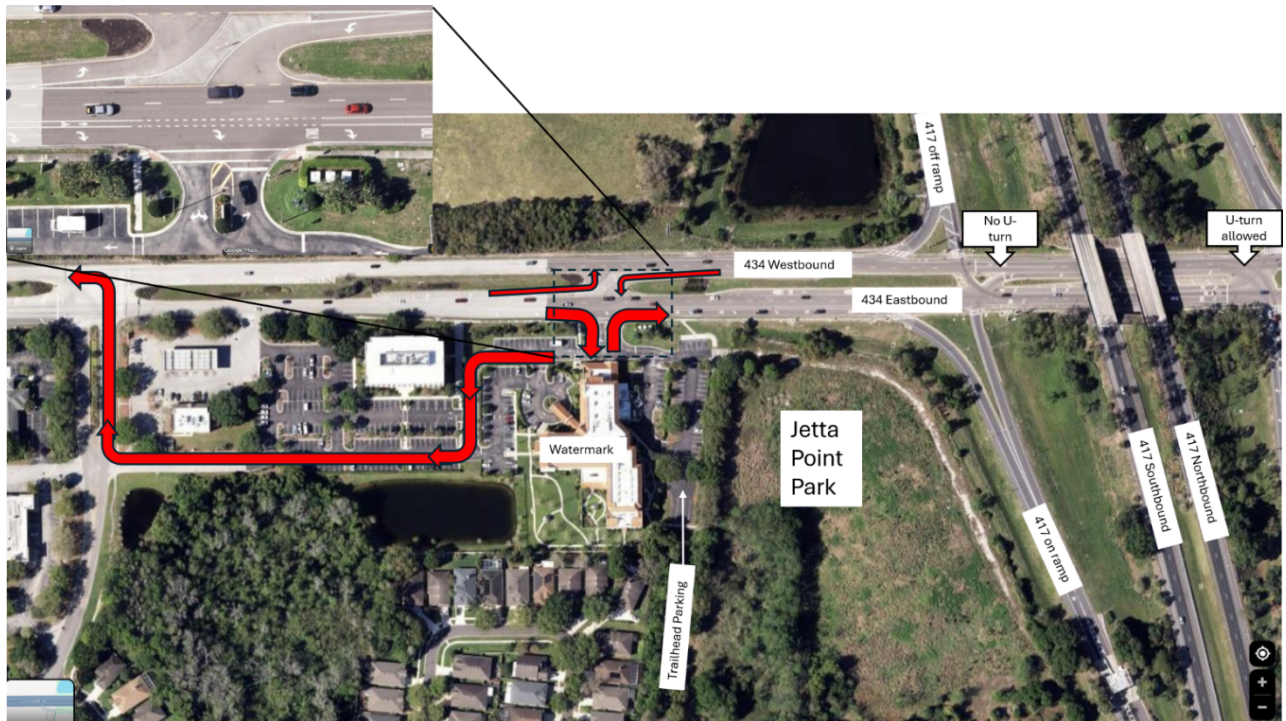


Figure 5: Traffic for current uncommercial access to small existing parking lot

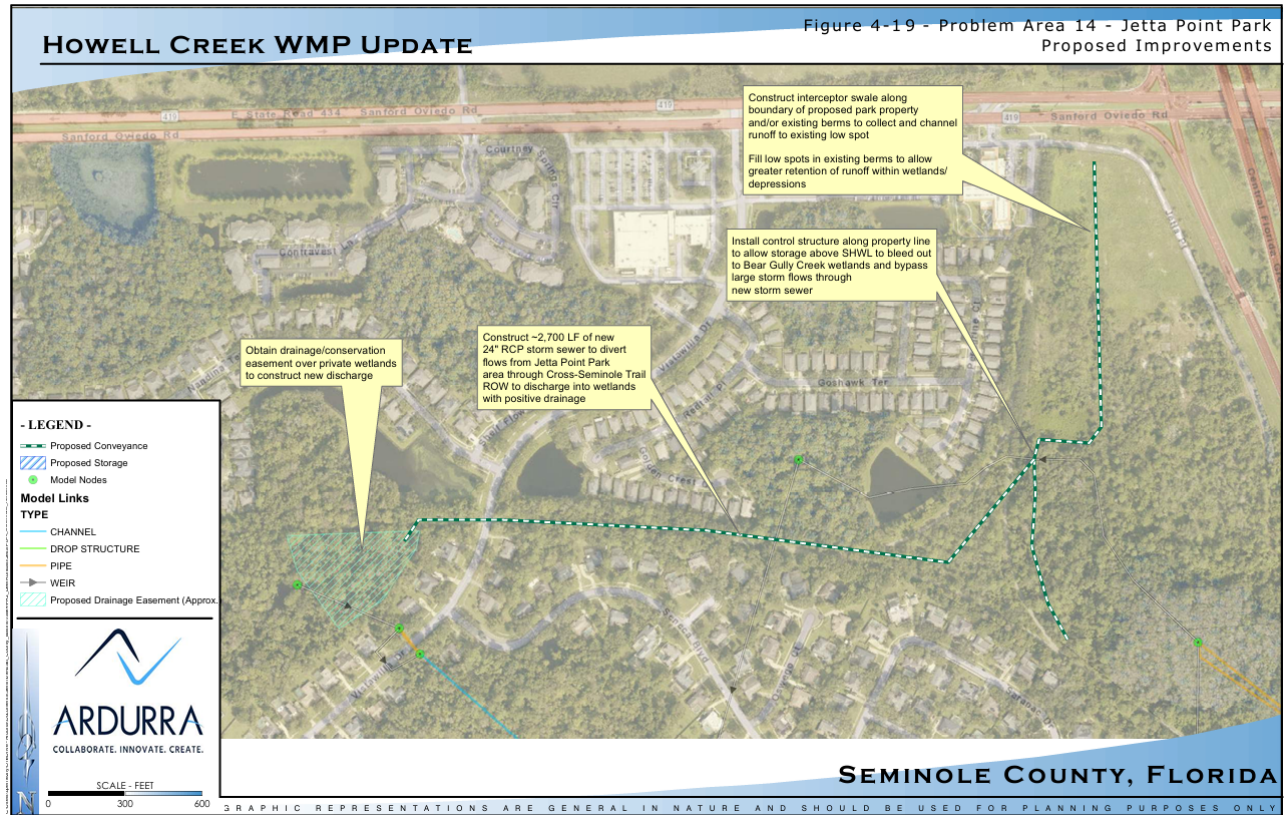


Figure 6: Detail of 2025 Ardurra Howell Creek Watershed Management Plan Update Task 7.1 - Draft Report, August 2025 (DRAFT Version 1), where green line is the conceptual conveyance and the cross hatched area at left is the proposed sink for stormwater.

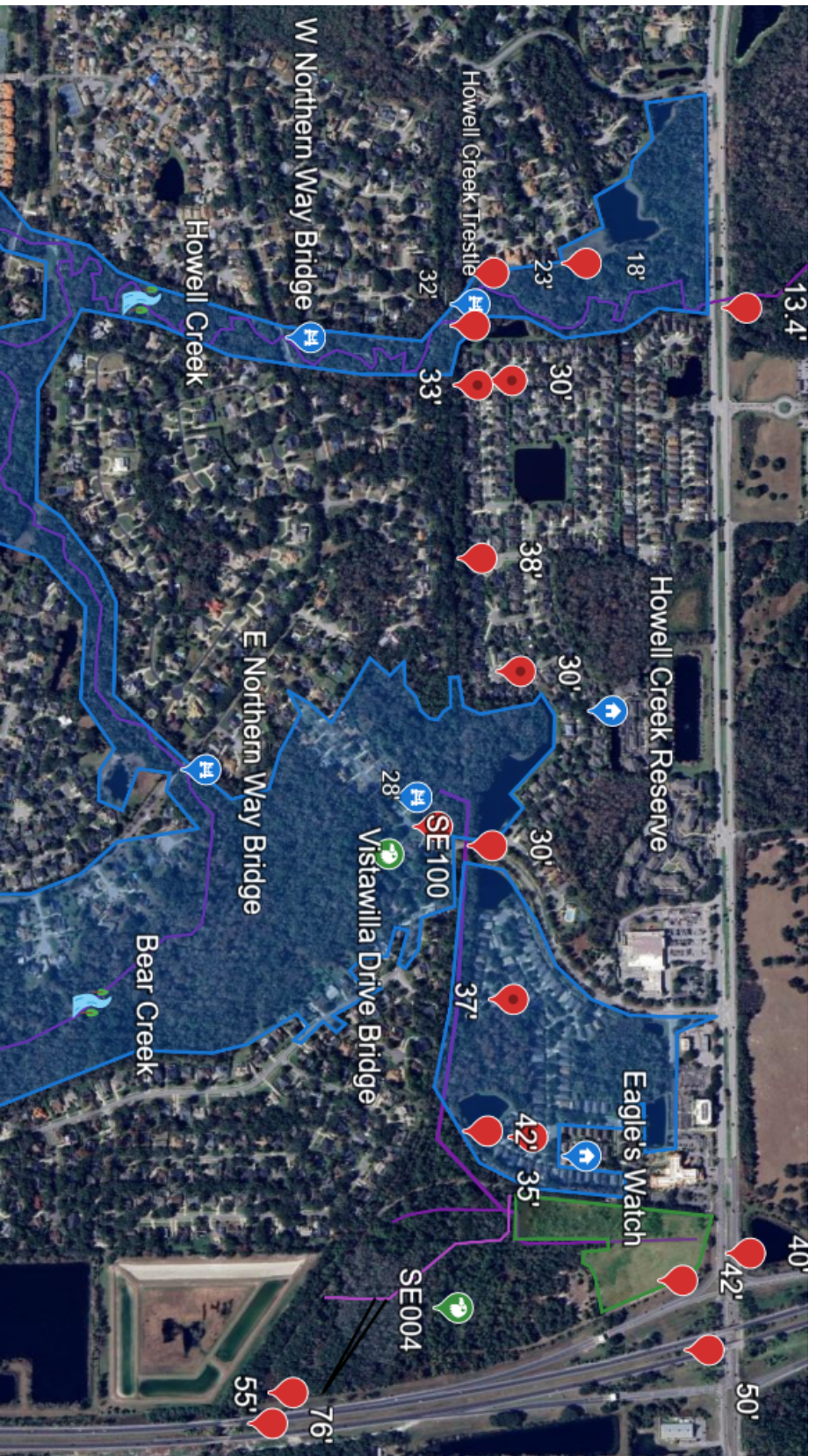


Figure 7: Overlay of Google Earth 2025 reference elevations, proposed area of reforestation (green) 2025 Ardurra proposed conveyance (purple), and Ardurra 100 year-24 hour inundation model results (blue), and active eagle nests SE004 and SE100.

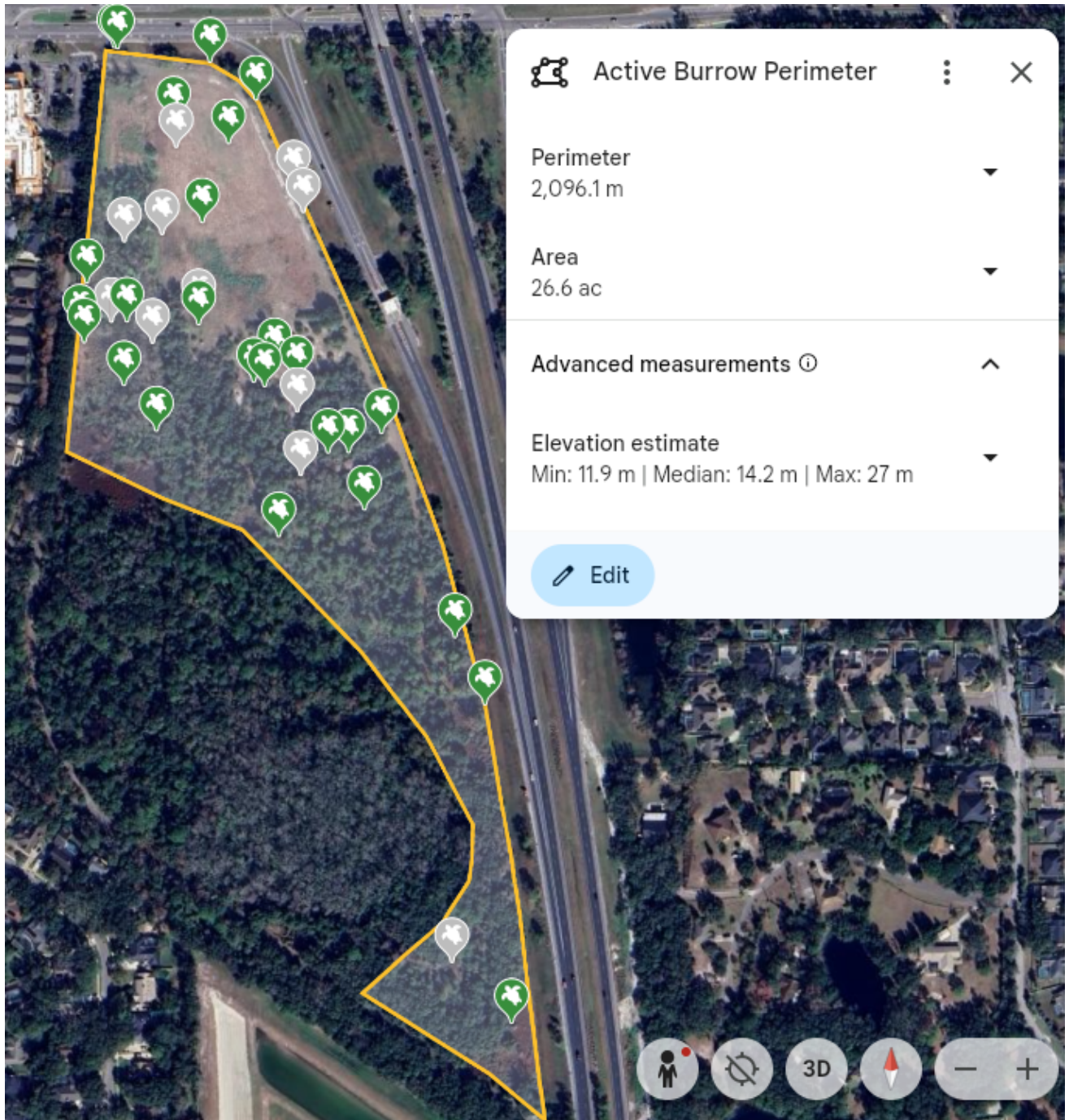


Figure 8: Gopher tortoise burrows (green=active, grey=inactive)