



SOUTH FLORIDA WATER MANAGEMENT DISTRICT

October 14, 2010

Ray Eubanks, Administrator
Plan Review and DRI Processing
Department of Community Affairs
2555 Shumard Oak Boulevard
Tallahassee, FL 32399-2100

Dear Mr. Eubanks:

**Subject: Collier County
Comments on Proposed Evaluation and Appraisal Report (EAR)**

The South Florida Water Management District (District) has completed its review of the proposed Evaluation and Appraisal Report (EAR) transmitted by Collier County (County) for preliminary review. The District appreciates the opportunity to provide water resource-related technical assistance during the County's evaluation of major issues and comprehensive plan elements. The County has committed to working with the District in updating the County's adopted Water Supply Facilities Work Plan as the Lower West Coast Regional Water Supply Plan is updated. The District requests the Department of Community Affairs (DCA) consider the following recommendations in its EAR sufficiency analysis:

Water Quality

- Retain the current language of Objective 2.2, in the Conservation and Coastal Management Element, which requires that surface waters discharging into estuaries shall meet Federal, State, or local water quality standards. The proposed change weakens the objective in providing protection to the County's surface waters. The District looks forward to working with the County on achieving water quality standards within the County's water bodies.
- Include an objective and related policies describing the strategies (including funding mechanisms) designed to achieve Total Maximum Daily Loads (TMDLs) and Nutrient Loading Criteria established for water bodies in the County.
- Incorporate objectives and policies for coordinating with the State in its TMDL program including efforts in assessing the verified list of impaired waters under Section 303(d) of the Clean Water Act and any subsequent TMDLs developed for those waters. This section should also address the planning and implementation of any future Everglades West Coast Basin Management Action Plans developed for water bodies with TMDLs in the Southwest Coast and Interdrainage Area Planning Units.

Ecosystem Restoration

- Include objectives and related policies describing planned coordination with the District in implementing the Lake Trafford Critical Restoration Project, Lake Trafford Watershed Management Plan, and Picayune Strand Restoration Project.
- Include a policy to emphasize land uses should not be inconsistent with adjacent restoration programs, such as the Comprehensive Everglades Restoration Plan (CERP).

Flood Protection

- Incorporate objectives and policies for floodplain management in the Stormwater Management Sub-Element. Floodplain management policies should include the implementation of floodplain management regulations, including provisions for incorporating compensating storage in development plans.
- Add a policy to the Immokalee Area Master Plan that provides a requirement for detailed design segments and development of funding mechanisms for the stormwater management improvements identified in the recommended alternatives of the Immokalee Stormwater Management Plan.
- Include a policy that addresses coordination with the District regarding the use of and/or connection to Works of the District. The County must coordinate with the District Right-of-Way Program for appropriate authorization prior to making use or connecting to Works of the District. The coordination includes but is not limited to canals and associated overbanks and water conservation areas. Specific requirements are codified in Chapter 40E-6, Florida Administrative Code.

Natural Systems

- Provide a policy that requires the development of management and restoration plans for the Pepper Ranch Conservation Area (Pepper Ranch) to protect its unique terrestrial biota and habitat. Management and restoration plans should be completed prior to incorporating the Pepper Ranch into the County's regional park system.

Water Supply

- Describe the programs in the Intergovernmental Coordination Element that provide coordination between the County and the other water suppliers to ensure that water supplies will be sufficient to meet projected water demands for the unincorporated areas.

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The District offers planning and technical assistance to the County and the Department of Community Affairs in developing sound, sustainable solutions to meet the County's future water supply needs and to protect the region's water resources. For assistance or additional information, please contact Deborah Oblaczynski, Senior Planner, at (561) 682-2544 or doblaczy@sfwmd.gov.

Sincerely,



Rod Braun

Director

Intergovernmental Policy and Planning Division
South Florida Water Management District

c: Mike Bosi, AICP, Collier County
Ken Heatherington, AICP, SWFRPC
Deborah Oblaczynski, SFWMD
Jim Quinn, FDEP
Brenda Winningham, DCA