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Date 2024-01-23 17:49
PriorityHighest

Dear Mr. Donaldson:

The South Florida Water Management District (District) has completed its review of the proposed amendment package from Martin County (County). The amendment package includes two amendments to the County's Comprehensive Plan: a Text Amendment (DOC #23-5ESR) to the Future Land Use Element and a Future Land Use Map Amendment (#23-6ESR) that proposes to change the land use from Agricultural to Rural Lifestyle on 3,902 acres. The subject property, which lies outside the Primary and Secondary Urban Districts of Martin County, is located within the boundaries of the Comprehensive Everglades Restoration Plan (CERP) project area (PALMAR Complex Natural Storage and Water Quality Improvement project).

No comments are being raised on the Text Amendment (DOC #23-5ESR). However, the District has determined that regional water supply, wetlands and floodplain management will be impacted by the proposed Map Amendment, DOC #23-6ESR.

The District provides the following comments for the Future Land Use Map Amendment under Section 163.3184(4)(g), Florida Statutes, (F.S.). These comments need to be addressed before final adoption of the amendment (DOC #23-6ESR). If these comments are not addressed prior to adoption, the District may recommend the state land planning agency, the Department of Commerce, challenge the amendment.

- The Indian River Lagoon South project (IRL-S) is a federally authorized project with the goal of reducing freshwater inflows and generating habitat and water quality improvements in the St. Lucie Estuary and Indian River Lagoon. The Project Implementation Report (PIR) for the IRL-S was authorized by Congress in the Water Resources Development Act (WRDA) of 2007. Included in this plan is approximately 92,000 acres of Natural Storage and Water Quality Areas. Of these areas, the Pal-Mar Natural Storage and Water Quality Area (17,143 acres) was identified and included in this project acreage. The 3,904-acre parcel, related to the proposed Comprehensive Plan Amendment and associated development project, is located entirely within the designated Pal-Mar Natural Storage and Water Quality Area. Project features for restoration of the natural storage and treatment areas involve removing, filling, or plugging drainage features such as culverts, ditches and swales to retain site runoff to restore former wetland (and adjacent upland) hydrology to those areas. The proposed project associated with the proposed Comprehensive Plan Amendment, appears to be inconsistent with the goal of this federally authorized project. Once approved, the project will not allow for the use of the entire 3,904-acres as water storage and upland/wetland restoration. In addition, if approved, these lands will no longer be for public use and do not appear to allow for the use as Natural Storage and Water Quality Areas as defined by the IRL-S project. The proposed project associated with the proposed Comprehensive Plan Amendment will conflict with the Indian River Lagoon – South project (IRL-S). As the IRL-S is a CERP program, it is a 50-50 partnership between the State of Florida and the federal government. As a result, the United States Army Corps of Engineers (USACE) will need to be contacted and coordinated with as well. The applicable contact with the USACE is Michael Drog (904-303-2358, michael.j.drog@usace.army.mil). The applicable CERP contact with the District is Patrick Murphy (561-682-6419, pmurphy@sfwmd.gov).

- The Applicant must detail the methodologies, assumptions, data sources, and analyses that will be used to assess whether its development program will have adverse impacts to the CERP project.
- It is unclear where the development is deriving water for both consumption and irrigation. The staff analyses says "the site has access to the C-44 canal for irrigation water", while other sections infer water and sewer will **potentially** be served by Martin County Utilities with the costs borne by the persons in the project area. Martin County Utilities Department says they have yet to evaluate plant and infrastructure capacity in order to serve the project and that a wellfield study and plant expansion analysis is yet to be completed. Please provide more detailed information regarding the availability and impact of water supply sources proposed to serve this project.
- An analysis of stormwater management needs and potential flooding issues have not been included in the proposed amendment. The amendment should be revised to include the following information:
 - An analysis of stormwater management needs for the proposed land uses, including an identification of the appropriate stormwater management infrastructure needed.
 - A demonstration that the development proposal minimizes and mitigates negative impacts on existing flood control facilities.
 - A demonstration that there will be no adverse offsite impacts, including impacts to adjacent rivers (e.g., the adjacent St. Lucie Canal), and District Surface Water Projects.
 - Acknowledgement that a Stormwater Management Permit may be required from the District. Pre-application meetings with District staff are strongly encouraged to identify issues early in the process.
- Please describe the use of alternative water supply sources such as reclaimed water to meet future water needs and incorporation of water conservation projects, consistent with the District's UEC Water Supply Plan Update and the County's Water Supply Facilities Work Plan.
 - The amendment should be revised to demonstrate how the County will conserve, appropriately use, and protect existing or proposed water sources as required by Section 163.3177(6)(d), F.S.
- The proposed amendment should be revised to include amendments to the Capital Improvements Element (CIE) and the Five-Year Capital Improvements Schedule (CIS) for the needed facilities. This includes both publicly and privately funded projects necessary to achieve and maintain adopted level of service standards, including projects needed to serve all adopted or anticipated large-scale developments, even if the County is not responsible for the improvements. The following issues should be addressed, as applicable:
 - Amendments to the CIE and CIS to include the list of projects (alternative and traditional) to be undertaken to be consistent with the revised data and analysis for the plan amendment.
 - Indicate if the projects are funded or unfunded. If a project is unfunded, provide a level of priority for funding. If planned improvements for DOC #23-6ESR extend beyond the Five-Year CIS and how they will be implemented and funded.

- Revise all maps to include a title, date, legend, and source of information. Please ensure all maps are legible.

The District requests that the County forward a copy of the adopted amendment to the District at SFLOCALGOVPLAN@sfwmd.gov.

Please contact me if you have any questions or need additional information.

Respectfully,

Althea P. Jefferson, AICP

Senior Policy & Planning Analyst