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April 5, 1999

Mr. Steve Dopp
North Central Florida Regional Planning Council
2009 NW 67 Place, Suite A
Gainesville, Florida 32653-1603

Re: Greenways of Gainesville DRI,
Alachua County

Dear Mr. Dopp:

We have reviewed the applicant's response to the request for additional information. Following our field survey of the above referenced project site on 5 April 1999 and discussions with Mr. Jeffrey Collins of the applicants consulting firm, we need the following additional information relating to quantification of impacts to gopher tortoises and their habitats, and proposed components of the mitigation plan to compensate for wildlife and habitat impacts on the site:

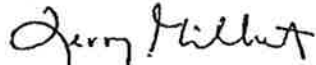
1. The total acreage of gopher tortoise habitat, and an estimate of the tortoise populations within occupied habitat areas of the project site based on survey data.
2. More detail is needed on the proposed mitigation plan for impacts to listed species.
 - The plan should address whether onsite or offsite compensatory mitigation is planned for the gopher tortoise.
 - The mitigation plan should also address how anticipated habitat impacts will be compensated for the eastern indigo snake and the Sherman's fox squirrel, two listed species which the consultant concurred during our field visit as having a high probability of

occurrence onsite. Potential methods to provide suitable areas of habitat for these species, as discussed during our field review, included expanding the widths of upland buffers around wetlands in strategic areas, and creating additional blocks of upland habitat adjacent to the larger wetland systems. With appropriate management, this scenario would also improve habitat values and provide more viable travel corridors, allowing wildlife access and use of the remaining protected habitat systems on the site. Specific management prescriptions should also be discussed, including the early use of prescribed fire within the protected uplands to improve habitat value, and long-term maintenance using a combination of mechanical methods and prescribed fire.

3. After completing efforts to further minimize wetland impacts, more information should be provided on the proposed compensatory mitigation plan for wetland losses. The detailed plan should specify how wetland enhancement would be accomplished, what habitat and water quality benefits would accrue, and how these improvements would be managed and maintained over the long-term. Of particular concern is the maintenance of appropriate hydroperiods within the wooded wetlands, and avoiding adverse impacts to vegetation within preserved areas caused by increased post-development runoff and flooding.

Thank you for the opportunity to provide input on this project. Please call me at (850-488-6661) if I can provide additional information.

Sincerely,


Terry Gilbert
Biological Scientist IV

TG

ENV 1-11-3

Green.inf

cc: Jeffrey S. Collins - Glatting, Jackson, Kercher, Anglin, Lopez, Rhinehart



Jeb Bush
Governor

Department of Environmental Protection

Northeast District
7825 Baymeadows Way, Suite B200
Jacksonville, Florida 32256-7590

David B. Struhs
Secretary

August 17, 1999

Mr. Chuck Keister
North Central Florida
Regional Planning Council
2009 NW 67th Place, Suite A
Gainesville, FL 32653-1603

Dear Mr. Keister:

Re: Greenways of Gainesville
Final Recommendations

The DEP Northeast District staff has completed the review of all documents provided to date concerning the Greenways of Gainesville DRI. And so, with the information provided in the second sufficiency response a comprehensive and complete review of the project can now be made.

The Greenways of Gainesville DRI site is flat with little topographical change. Approximately 40% of the site are jurisdictional wetlands and the majority of the site soils are poorly drained and are described as severely limited for the proposed use. Also, four facultative wetland species appear over the majority of the site and approximately half the site is within the 100-year flood zone. With this information – the topography, the soil types, the existing wetlands, the plant species and the flood zone – it is demonstrated that the site is clearly a flat, wet site that is prone to flooding. To compound the potential flooding problem the development will bring impervious surfaces to the site that will reduce the pervious surface area where stormwater could naturally percolate. Therefore, based on the site characteristics and the extent of the proposed development, suitability of the site for major development is in question. It is requested that the following recommendations be incorporated into the project design prior to approval of a development order:

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

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1. Surface Water and Ground Water Quality Monitoring Plan (SGWQMP).

The applicant shall prepare a site-specific plan to monitor the surface water and ground water at the site. The plan should be developed and implemented prior to initiation of any construction. Components of the plan shall include a minimum of six baseline sample events prior to any land clearing on site, sampling locations, sampling of specific environmental parameters throughout buildout and project quality assurance. The proposal shall include a quarterly and cumulative annual reporting system with copies of the reports being submitted to the reviewing agencies within fifteen days of receipt of the monitoring data from the reporting laboratory. Enclosed is a sample environmental parameter list and an example of a Surface Water Quality Monitoring Plan (SWQMP). The plan to be developed for the Greenways of Gainesville DRI should also include ground water monitoring. The SGWQMP for this site needs to be approved by the FDEP and the ACEPD and incorporated into the Development Order. The requirement for a SGWQMP is an established process that has been required by other projects including Haile Plantation, Progress Center, and Alachua General Hospital.

2. Wetland Monitoring Program (WMP).

A site-specific plan to monitor the wetlands at the site should be developed and implemented prior to initiation of any construction. Components of the plan include sampling locations, a minimum of six baseline sample events prior to any land clearing on site, sedimentation rate, sediment trace metal concentrations, sediment nitrogen and phosphorus concentrations, changes in frequency, abundance and distribution of vegetation and inflow and outflow surface water quality for nutrients, metals, turbidity, oils, greases and bacteria. The proposal shall include a quarterly and cumulative annual reporting system with copies of the reports being submitted to the reviewing agencies within fifteen days of receipt of the monitoring data from the reporting laboratory. The WMP for this site needs to be approved by the FDEP and the ACEPD and incorporated into the Development Order.

3. It is recommended that the minimum upland buffer widths (not average) conform to the minimum buffers for sedimentation control identified in the document, "Buffer Zones For Water, Wetlands And Wildlife In The East Central Florida Region." No land clearing, pruning or tree removal should be allowed in the buffer areas. All construction should begin at least 25 feet from the landward edge of the upland buffer.

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4. It is recommended that the density of development be decreased to lessen the amount of impervious area on site.

5. It is recommended that all wetland road crossings utilize an elevated design to lessen hydrological alterations and the potential for increased flooding.

If you have any questions or concerns I can be reached at (904) 448-4300, extension 207 or jan.brewer@dep.state.fl.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Jan P. Brewer". The signature is fluid and cursive, with a large initial "J" and "B".

Jan P. Brewer
Environmental Manager