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October 12, 2001

City Commissioner Pegeen Hanrahan
P.O. Box 490
Gainesville, Florida 32602

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Ref: Wetland Policies

Dear Commissioner Hanrahan:

We submit this letter as a concerned citizen of Alachua County and as a practicing Professional Engineer. As a Professional Engineer, I have practiced in the Gainesville Area since 1983 (1983-1988 as an Engineer Intern with a local firm and 1988-Current as a Professional Engineer and owner of a local firm).

During this period I have designed and permitting well in excess of 150 projects within the city limits of Gainesville. Several of these projects included on-site wetlands, and of these projects, several included wetland impacts which required mitigation. If wetland impacts with an appropriate mitigation were not permitted, many of these projects would have been eliminated and all would have been modified or moved to another location. The following defines a representative list of the projects to which I refer:

<u>Project</u>	<u>Description</u>	<u>Location</u>
Alachua County Health Department	74,000 s.f. public health unit facility	SE 24 th Avenue
Hogtown Creek Greenway	Boardwalk & trail system	Loblolly to NW 8 th Avenue
Royal Village Apartments	Multi-Family apartment complex	SW 6 th Street & Depot Avenue
Eden Park	Multi-Family (affordable housing) Apartment complex not yet constructed	NE 39 th Avenue & NE 15 th Street
Northwest Commercial Industrial Park Master Stormwater System for The City of Gainesville	Master Stormwater Basin serving the NW Commercial/Industrial Park	SR-121, north US-441
Rosemont Subdivision	Single-Family subdivision	NW 37 th Street, north of NW 53 rd Avenue
Burkhardt Distributor	Distribution warehouse	Northwest Commercial/Industrial Park
Pepsi	Distribution warehouse	Northwest Commercial/Industrial Park
PCR Facility Improvements	Industrial facility	Airport Industrial Park

Be advised development within the Hogtown Creek Greenway property from NW 23rd Avenue to Lake Kanapaha would be significantly impacted by a wetland policy that did not include the allowance of wetland impacts. It would be safe to say that a continuous trail system would be eliminated if wetland impacts were not allowed. The ½ mile section between Loblolly & NW 8th Avenue included wetland impacts (the boardwalk facility spans wetland areas).

The wetland policies recommended by the Sierra Club would have tremendous impacts on development of parcels that contain or are near wetland systems, including the Hogtown Creek Greenway. If 100% wetland preservation is required, urban development cannot occur on parcels that contain wetlands.

The preservation of all wetlands regardless of quality, function, and other characteristics is not reasonable. Wetland mitigation for losses to poor quality wetland systems can be utilized to improve the quality and function of other higher quality and more function wetland systems, thereby, improving the overall quality and function of wetland systems and their habitat within the City of Gainesville.

All State Water Management Districts, the Florida Department of Environmental Protection, and the Department of the Army Corp of Engineers allow mitigation for wetland impacts. Mitigation in the forms of preservation, enhancement, and creation are permitted. Mitigation ratios are dependent upon the characteristics of the impacted wetland and the specifics of the mitigation.

I support the City's Staff recommendation dated September 24, 2001 with the following suggested modifications:

- 1.1.1.b.5.** Subparagraph 2 requires the establishment of ratios for wetland preservation, restoration, & creation. The provision of a minimum ratio of 5:1 seems arbitrary. Suggest deleting this item and retain item 2 only.
- 1.1.1.b.7.** Subparagraph 6 is supported scientifically. Subparagraph 7 is only supported politically. Suggest deleting item 7.
- Objective 2.1 & Policy 1.1.1.** The objective includes maintenance of acreage. If this is the case, then any wetland impacts must at least include a "creation" mitigation plan in order to maintain acreage. If the acreage criteria is not included, mitigation would not have to include "creation", but would include preservation and enhancement as mitigation tools. Suggest evaluating the requirement to maintain wetland acreage City wide.
- 2.4.6.C.** No net increase in the rate of runoff from development sites adjacent to regulated creeks, lakes, & wetlands. I agree with this requirement as it relates to creeks & lakes, but not wetlands.

Otherwise, utilization of isolated wetland systems located wholly within a parcel could not be used for stormwater management. This prohibition would have an effect on the hydrology of wetland systems. Suggest modifying language to permit "wetland" stormwater treatment.

The above suggestions are offered to develop policies with language that does not prevent the intent or objectives.

In closing, the provision to maintain a strict no net loss of wetland acreage and to not allow any form of any wetland impact are very restrictive and detrimental policies. The allowance of wetland impacts with proper and strong mitigation policies is better for the environment of the City of Gainesville.

Sincerely,

CAUSSEAUX & ELLINGTON, INC.



Rory P. Causseaux, P.E.
President

cc: Mayor Thomas Bussing
City Commissioner Chuck Chestnut
City Commissioner John Barrow
City Commissioner Warren Nielsen