



Environmental Engineer,
Biologists, & Planners

water & air
RESEARCH, INC.



August 23, 1999

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

Subject: Greenways of Gainesville

Dear Mr. Kiester:

We have completed our review of the Greenways of Gainesville DRI including their responses to questions and have the following comments and recommendations.

The information in the DRI clearly demonstrates that the site is flat with a significant amount of the site currently in wetlands and, per the applicant, 42 percent of the site lies below the 100 year, 24 hour flood elevation. Per the "Master Development Plan, Map H" the applicant proposes to develop 55 percent of the site (all land use categories except preserved wetlands, stormwater management area, park, and upland preservation/open space/buffer/miscellaneous.) Further, they have provided no documentation demonstrating how this can be accomplished consistent with acceptable off-site water quality and quantity impacts. In response to questions regarding this, the applicant has simply claimed that the problem can and will be handled.

In the absence of data to show otherwise, it is not at all obvious to us that an adequate stormwater management plan can be developed for this proposed development. We say this in full consideration of:

1. site characteristics,
2. the fact that development on the site will increase runoff, and
3. the fact that the applicant will be allowed zero degradation of downstream waters.

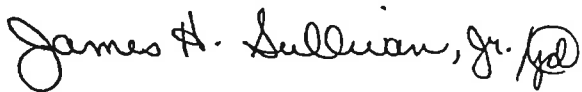
Consequently, we recommend that this development not be allowed to proceed until it can be clearly demonstrated that downstream waters can and will be adequately protected.

Additionally, we recommend that the applicant be required to develop a monitoring plan, subject to approval by regulatory agencies, for both surface and groundwater to provide additional protections against potential future adverse water quality impacts.

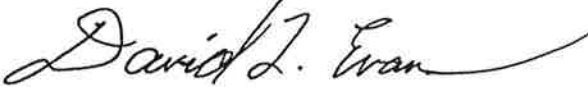
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On page 15-1 of the 2nd Response to Request for Additional Information the applicant states that a comprehensive on-site mitigation plan has been prepared. To our knowledge this plan has not been distributed for review. Given the considerable potential for impacts to wetlands, this information is a crucial element of the applicant's ability to ensure wetland protection. We recommend that the applicant provide a detailed comprehensive mitigation plan before the development is allowed to proceed. The plan should clearly demonstrate that wetlands both on and off the site will be protected.

Sincerely,



James H. Sullivan, Jr., Ph.D., P.E.



David L. Evans. Ph.D.