

RECEIVED**MAY 19 1993****D.E.R. SOUTH DISTRICT**

May 17, 1993

Ms. Susan Coughanour
South Florida Water Management District
3301 Gun Club Road
West Palm Beach, FL 33416-4680

Re: Lee County Solid Waste Energy Recovery Facility
Offsite Transmission and Utility Lines
Post Certification Submittal

Subject: Lee County's Response to SFWMD First Sufficiency Review dated May 5, 1993

Dear Ms. Coughanour:

Enclosed please find our responses to the comments issued by the South Florida Water Management District (SFWMD) on May 5, 1993 regarding the Lee County Solid Waste Energy Recovery Facility (SWERF) offsite transmission and utility lines. SFWMD comments are in bold face and the County's responses are in standard type below them. We trust that these responses adequately address the concerns of the SFWMD and appreciate your expeditious review of our submittal.

Water Use

SFWMD COMMENT # 1



Entered into
OCULUS
South District

The submittal does not indicate whether or not any dewatering activities will be required for the proposed construction activities. Please address. If dewatering activities are proposed, please submit a detailed plan for the proposed dewatering activities, pursuant to Certification Condition XV.B.3.a.

County Response:

At this point in time the contract for the installation of the offsite utility lines has not been awarded and therefore a contractor has not been selected for this portion of the project. We believe that some dewatering will be required on the project, however, we do not have current knowledge of the future contractor's intended means and methods. Thus any dewatering information we supply to you now would be premature. Please note that the contractor who is selected will submit his proposed methods of construction, i.e. dewatering, to SFWMD for their review.

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Wetlands

SFWMD COMMENT # 2

Please clarify if all proposed construction or construction-related activities will occur within the existing road rights of way? Are any activities proposed within the vegetated areas adjacent to the existing cleared portions of the road right-of-ways? If so, please describe.

County's Response:

All proposed construction or construction related activities will occur within the existing road right-of-ways except for two areas. One is within the Fort Myers cemetery south of Michigan Avenue. This is for a distance of approximately 220 linear feet and is immediately adjacent to the existing right-of-way. This area consists of 180 linear feet of maintained sod and 40 linear feet of an existing canal. The other area is in front of the Lee County Vo-Tech School and Health Department, also south of Michigan Avenue. This area consists of 2400 linear feet of sodded area and 20 linear feet of existing canal.

There are no proposed construction activities outside of the cleared portions of the existing right-of-ways.

SFWMD COMMENT # 3

Will the proposed construction activities require vegetative clearing or dredging and filling? If so, please designate the limits of such areas on the proposed construction plans. In addition, please contact Karen Johnson at the Ft. Myers Service Center to make arrangements to review the wetland limits located in the areas proposed for construction.

County's Response:

There will be minor vegetative clearing primarily of exotic plant species within the road right-of-way. Any dredging and filling activities will be temporary and the areas restored to existing grade following pipeline installation. The County's representatives are in the process of arranging a site inspection of the proposed utility line alignments with the SFWMD Ft. Myers office.

SFWMD COMMENT # 4

Pursuant to Certification Condition XV.D.2.c.(1), please provide specific acreage figures and locations of all wetlands within and adjacent to the rights-of-way proposed to be impacted by construction activities. Please include an explanation as to why no feasible alternatives exist to avoid the proposed wetland impacts.

County's Response:

Based on a preliminary wetland mapping inspection performed by Kevin L. Erwin Consulting Ecologists, Inc. to Malcolm Pirnie Inc. and Lee County, no native wetland habitats occur within the construction limits of the proposed utility line alignments. However, several drainage canals and roadside swales occur within the utility line alignments. A site inspection with SFWMD staff is being scheduled to determine which if any of these areas are considered to be SFWMD jurisdictional wetlands.

This alignment was chosen to utilize existing cleared right-of-way. Alternate routes would have required substantially more impact to native habitat.

SFWMD COMMENT # 5

Pursuant to Certification Condition XV.D.2.c.(4), please submit documentation which demonstrates that the proposed construction/excavation activities will not adversely impact off-site wetlands.

County's Response:

Appropriate turbidity and erosion control devices will be installed adjacent to all wetlands along the proposed utility line alignments. The construction of this project will not alter the current hydrology of offsite wetlands nor require the permanent dredging or filling of offsite wetlands.

SFWMD COMMENT # 6

Pursuant to Certification Conditions XV.D.2.c.(5) through (8), please describe any mitigation activities proposed to offset the wetland impacts associated with the construction of the transmission and utility lines.

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County's Response:

As described above, all construction impacts will occur within existing disturbed right-of-way areas. No long term wetland mitigation associated with the offsite utilities is proposed.

If you have any questions regarding the above responses, please do not hesitate to contact us.

Very truly yours,

MALCOLM PIRNIE, INC.



Donald R. Markley
Assistant Project Manager

- c: Karen Johnson, South Florida Water Management District
Lindsey Sampson, Lee County Department of Solid Waste
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Walter Stephens, Lee County Natural Resources Management
George Crawford, Lee County DOT&E
David Dee, Carlton, Fields, Ward et al.
Wayne Daltry, Southwest Florida Regional Planning Council
Ken Plante, Department of Natural Resources
James V. Antista, Florida Game & Freshwater Fish Commission
Steve Pfeifer, Department of Community Affairs
Dan Craig, Ink Engineering, Inc.
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jg/DM

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