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November 10, 2022

VIA DIRECT UPLOAD

Brandon Dunn, Principal Planner
Department of Community Development, Zoning Section
Lee County
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COMMUNITY DEVELOPMENT

**RE: Daniels South Comprehensive Plan Amendments
CPA2021-00017 & CPA2021-00018 – 3rd Insufficiency Response**

Dear Mr. Dunn,

The purpose of this letter is to provide a response to the Lee County Department of Community Development's review comments dated October 28th, 2022, for the Comprehensive Plan Amendment applications referenced above. We are in receipt of the Serv-U File Share from Janet Miller on November 2, 2022 and have also provided copies of the requested electronic files to that link. We believe that with this additional information, the comprehensive plan amendment applications can be scheduled for consideration by the Local Planning Agency and Board of County Commissioners. However, we continue to welcome additional calls and emails from County Staff to address any substantive comments ahead of the public hearings.

1. The integrated surface and groundwater model files were not provided as part of the resubmittal. Please provide the model files to Lee County Division of Natural Resources. Please note Staff will run the models.

Response: The requested digital model files have been uploaded through Lee County's Serv-U File system on November 3, 2022 and should be available to County staff.

If there is any issue accessing the files, they are also available through Progressive Water Resources' (PWR) Sharefile link below. As indicated in the model output files previously submitted, Peter A. Brown, P.E., certified the results and if staff has any questions or comments, please do not hesitate to contact Peter directly at PWR's Sarasota office. Please note that during their development, the model files were reviewed by the firm that created ICPR4, Streamline Technologies, Inc. After review of the model files, Streamline was in agreement with both the approach and results determined by PWR.

<https://prowatersource.sharefile.com/d-sec48e31b96e7442ea021b450416c4aa7>

2. On Page 2 of the Response Letter the applicant states "On June 28, 2022 a dry season groundwater level elevation was recorded in the monitor well at a depth of 20.96 feet below the measuring point". Lee County rain gauges at the Gateway Water Treatment Plant received 9.9 inches in May and 15.34 inches in June for a combined rainfall of 25.24 inches. This is

not considered an accurate account for a "Dry Season" data point. Please use a more accurate "Dry Season" water level reading from the months of February, March, or April. Please revise the groundwater model accordingly.

Response: Staff is correct in that rainfall amounts in Lee County are typically lower from January through May as compared to June and the amount of rain reported at the Gateway Water Treatment Plant for May and June 2022 was well above the 30-year mean for those same months. However, as staff is also aware there is a delay in which rainfall recharges (increases groundwater levels) within the underlying confined Sandstone Aquifer and records indicate that seasonal highs for the Sandstone Aquifer typically occur from September through November.

To provide additional assurance that the proposed project will not result in adverse impacts to the water resources, PWR looked at the period of record groundwater elevations recorded at USGS Sandstone Aquifer monitoring well L-729, located to the east, within Lehigh Acres. L-729 has been monitored since May 1977 and on April 15, 2017 (prior to Hurricane Irma) groundwater levels exhibited a period of record low of -3.74 feet NGVD or -4.94 feet NAVD. As previously provided, the Sandstone Aquifer at the Applicant's Timber Creek development located across Daniels Parkway occurs at elevation -55.45 feet NAVD. Therefore, the Maximum Developable Limit (MDL) in the vicinity of the proposed Daniels South development is anticipated to occur at approximately -35.45 feet NAVD. Assuming the highly conservative period of record low groundwater elevation recorded at monitor well L-729, Sandstone Aquifer groundwater levels would remain 30.51 feet above the MDL at the applicant's property.

As indicated in PWR's groundwater flow modeling, the Applicants' proposed use of the Sandstone Aquifer for irrigation is predicted to exhibit approximately 1-foot of drawdown at the property boundary. Using the same conservative approach described above, even under the worst-case scenario (using the period of record low from L-729) groundwater levels would remain approximately 29.51 feet above the MDL and 49.51 feet above the Sandstone Aquifer. Therefore, no adverse impacts to the water resources are anticipated. Please note that to date, groundwater levels collected at Timber Creek's Sandstone Aquifer monitoring well exhibits less variability, as compared to monitor wells within, or in close proximity to, Lehigh Acres. This is not surprising given the extraordinary number of Sandstone Aquifer wells within Lehigh Acres.

3. Please provide the groundwater model results including water level contours resulting from a maximum water withdrawal for 90 days with no recharge. Please detail which well and what qualifying dry season water level was used for the model.

Response: Please note that the 90-day Maximum Month groundwater flow modelling performed by PWR computes drawdown and is independent of groundwater levels. Once the model run is complete, the results are then superimposed on groundwater levels to determine potential impacts to the MDL, exiting legal users, etc. (see response to Question No. 2). Therefore, the model results previously submitted are still relevant.

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We believe that the responses above and attached materials provide the information necessary to appropriately respond to the comments provided. Should additional information be necessary to find the application sufficient, please do not hesitate to contact me at 850-354-7624 or email me at tekblad@stearnsweaver.com.

Sincerely,



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