



SOUTH FLORIDA WATER MANAGEMENT DISTRICT

** Delivered Via Email*

August 28, 2020

Dennis Shultz *
Flynn Engineering Services, PA
241 Commercial Blvd
Lauderdale-By-The-Sea, 33308

**Subject: Jonathans Landing Old Trail Golf Club- Golf Course Mod
Request for Additional Information
Application No. 200812-4045
Martin County**

Dear Mr. Shultz:

District staff reviewed the above-referenced application. As discussed with you on August 26, 2020, the District is requesting the following information, in accordance with Section 5.5.3.1 of the Environmental Resource Permit Applicant's Handbook Volume I (Vol. I), adopted by reference in Section 62.330.010(4)(a), Florida Administrative Code (F.A.C.), to complete the application and provide reasonable assurances for permit issuance:

1. The request to modify the permit does not qualify for a minor modification because the proposed modification will substantially alter the conditions of the permit. This application for modification will be processed as a new Individual Permit major modification. Please submit the required \$3,300.00 fee. Payment of application fees can be done by credit card on the District's ePermitting website, or by check. If submitted by check, please make the check payable to the South Florida Water Management District and reference Application No. 200812-4045 in the memo section of the check to ensure adequate processing. [Section 6.2.1, Vol. I; Rule 62-330.071, F.A.C.]
2. What type of water quality pretreatment will be provided for runoff from golf course areas prior to discharge into wetlands? Please provide calculations which demonstrate that all runoff which enters each wetland area will receive the required water quality treatment prior to entering the wetland. Also, please provide construction details of the proposed water quality treatment method. [Section C, Form 62-330.060(1), F.A.C. and Sections 10.2.2.4 and 10.2.4.1, AH Vol. I]
3. Is the receiving waterbody known to be impaired and/or has a Total Maximum Daily Load (TMDL) or Basin Management Action Plan (BMAP) been established for the receiving waterbody? If so, please provide specific descriptions of all water quality parameters for which the waterbody is known to be impaired. Demonstrate that the proposed project will not contribute to violations of state water quality standards in accordance with Applicant's Handbook, Vol. II. Further, please be advised that projects discharging to an impaired water body are required to provide 150% of the normal water quality treatment. Please submit revised calculations and plans to show that these requirements are met.[Form

62-330.060(1)1.2.b.] [Section 4.2.1, AH Vol. II]

4. Please provide drainage calculations that show that the proposed project is consistent with the assumptions in Permit No. 43-00221-S, provides the required water quality treatment, does not result in higher stages than previously permitted and does not result in exceedance of the maximum allowable discharge. The calculations must be signed, sealed, and dated by a registered professional. [Section 3.7, AH Vol. II].
5. Please provide reasonable assurance that the proposed construction activities will not cause adverse secondary impacts to the functions of wetlands. Based on the submitted plans, it is unclear if there will still be a sufficient upland buffer between the proposed constructions and the wetland areas; and if there will still be sufficient pre-treatment of runoff before entering the wetland areas. Please revise the construction plans to incorporate the following information [Section C, Form 62-330.060(1), F.A.C.]:
 - a) Labels which include both the preserved wetlands and upland buffer zones;
 - b) Labels of any existing and proposed water quality treatment swales located along the wetland boundaries;
 - c) Labels which denote the limits of construction;
 - d) Cross-sections showing the transition from the proposed construction areas into adjacent wetlands;
 - e) Include details of slope grades, location of temporary and permanent turbidity control devices, and methods of slope stabilization and re-vegetation.
6. The proposed relocation and reshaping of the stormwater management lakes may affect the existing hydroperiod of certain wetland preserve areas. Please demonstrate that the proposed relocation of the lakes will not result in adverse impacts to wetlands' existing hydrology by providing an analysis of gradient criteria evaluating the compatibility of the proposed control elevations with the preserved and offsite wetlands, in accordance with Section 3.12, AH Vol. II]. In order for Staff to assess whether the proposed relocations of the storm water management lakes will cause significant drawdown impacts to adjacent wetlands, please provide calculations of the gradients resulting from the separation distance and driving head between the lake control elevations and adjacent wetlands.
7. Permit No. 43-00221-S required the installation of impermeable barriers between all lake areas and wetland preserves to protect the wetlands from hydrological impacts. If impermeable barriers are proposed for the relocated lakes, please update the plans to show their locations and provide details for each impermeable barrier. Please also provide soil borings which document the presence of a natural impermeable or semi-impermeable soil horizon into which the proposed impermeable barrier can be anchored. Also, please provide details of the interface between the impermeable barrier and the impermeable or semi-impermeable horizon within the soil. [Section C, Form 62-330.060(1), F.A.C.]
8. Please indicate the proposed control elevations for the lakes and provide documentation of the seasonal high water and normal wet season water elevations for each wetland preserve within the project area. Include dates, datum, and methods used to determine these elevations. Such documentation may consist of lichen lines, algal mats or rafted debris, and buttressed tree trunks, etc. Additional information and a site inspection by District Staff may be required based on the documentation that will be provided. [Section C, Form 62-330.060(1), F.A.C.]

9. Will temporary dewatering be required as part of the construction activities? Please contact Alberto Naya from the Water Use Bureau at (561) 682-2513, or via email anaya@sfwmd.gov, to determine if a Water Use Permit will be required for dewatering. Because of the inseparable nature of water use and surface water management, and in accordance with Subsection 2.3(b), Environmental Resource Permit Applicant's Handbook Volume II, District staff will review these applications concurrently and final agency action will be taken once both applications are deemed complete.
10. The submitted application requests the permit be issued to Jonathan's Landing Golf Club Inc. The proposed project area is currently owned by Jonathan's Landing Golf Club Inc. and Jonathan's Landing Inc., an inactive corporation. Please provide application form (Section A) with an authorized signature for Jonathan's Landing Inc. or the current entity requesting the permit be issued to them as a joint permittee. [Section 4.2.3(d), Vol. I]
11. Provide documentation of real property interest for Jonathan's Landing Inc. or the current entity, such as a warranty deed, over the property subject to the proposed activities. If Jonathan's Landing Golf Club Inc. is to be the sole permittee, provide documentation of real property interest for the entire proposed project area. [Section 4.2.3(d), Vol. I]

Advisory Comments: The following comments are advisory in nature and do not require a response to the District.

A1. Please note: As of October 1, 2017, the SFWMD will no longer send a copy of an application to the U.S. Army Corps of Engineers (Corps). You will need to apply separately to the Corps using the federal application form (ENG 4345) for activities under federal jurisdiction. Please see the Corps' Jacksonville District Regulatory Division Sourcebook (www.saj.usace.army.mil/Missions/Regulatory/Source-Book/) for more information about federal permitting. Please call your local Corps office if you have questions about federal permitting.

A2. Included with this letter/permit is a brochure from the Florida Department of Environmental Protection (FDEP) on Florida's National Pollutant Discharge Elimination System (NPDES) program for construction activities.

As the brochure indicates, the U.S. Environmental Protection Agency authorized the FDEP in October 2000 to implement the NPDES stormwater permitting program in Florida. The District is assisting FDEP by distributing this information to entities which may be subject to regulation under the NPDES program. No response to the District is required.

A "Generic Permit for Stormwater Discharge from Large and Small Construction Activities" (CGP) is required for a construction activity which ultimately disturbs an acre or more and contributes stormwater discharges to surface waters of the State or into a municipal separate storm sewer system.

The permit required under FDEP's NPDES stormwater permitting program is separate from the Environmental Resource Permit required by the District. Receiving a permit from the District does not exempt you from meeting the NPDES program requirements.

If you have any questions on the NPDES Stormwater program, call 866-336-6312 or email FDEP at NPDES-stormwater@dep.state.fl.us. For additional information on the NPDES

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Stormwater Program including all regulations and forms cited in the brochure visit:
www.dep.state.fl.us/water/stormwater/npdes/.

Prior to responding to this letter, please contact the assigned staff members to discuss solutions to the above questions and/or set a meeting to resolve the remaining issues: Morgan Reins, Environmental Analyst 3 at (561) 682-2149 or via email at mreins@sfwmd.gov; Carolyn McCreedy, Engineering Specialist 4 at (863) 462-5260 x3042 or via email at cmccreed@sfwmd.gov; and Rich Walker, Property Analyst at (561) 682-6741 or via email at rdwalker@sfwmd.gov.

Please submit the complete response electronically on the District's ePermitting website (www.sfwmd.gov/epermitting) using the 'Additional Submittals' link. Information on the District's ePermitting program is enclosed. Alternatively, please provide (1) original hard copy of the requested information, clearly labeled with the application number, to District Headquarters, 3301 Gun Club Road, West Palm Beach, Florida, 33458.

If a complete response is not provided within 90 days of this letter, this application will be processed for denial, in accordance with Section 5.5.3.5 of Vol. I. If additional time is necessary, please submit a written request for an extension via the ePermitting website before the 90-day period ends, including a description of the circumstances requiring the extension of time.

For projects where more than 90 days will be needed to develop a complete application, it is recommended that the applicant withdraw the current application and resubmit a complete application at a later date. The processing fee, if paid, can be applied to a new application that is submitted within 365 days, pursuant to Rule 62-330.071(3), F.A.C. If the application is denied by the agency, fees will not be returned or credited.

Sincerely,



Gary Priest
Section Leader, Environmental Resource Bureau

c: Robert Widman, Jonathans Landing Golf Club, Inc *
Jonathan's Landing Inc