

Sandy Schildhorn

From: Manning, Terese <tmanning@sfwmd.gov>
Sent: Thursday, August 26, 2021 2:55 PM
To: Mary Holden
Cc: Ray Eubanks (DCPexternalagencycomments@deo.myflorida.com); Margaret Wuerstle (mwuerstle@swfrpc.org); justin.stiell@deo.myflorida.com
Subject: City of Marco Island, DEO #21-1ESR, Comments on Proposed Comprehensive Plan Amendments

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Dear Ms. Holden:

The South Florida Water Management District (District) has completed its review of the proposed amendment package from the City of Marco Island (City). The amendment package includes amendments to update the City's Comprehensive Plan. The District provides the following comments under Section 163.3184(3)(g), Florida Statutes, (F.S.). The important state resource impacted by this amendment is regional water supply. These comments need to be addressed before final adoption of this amendment. If these comments are not addressed prior to adoption, the District may recommend the state land planning agency, the Department of Economic Opportunity, challenge the amendment.

Future Land Use Element

- Revise Policy 5.1.1 to demonstrate how the City will coordinate future changes of land use with the availability of water supply and water supply facilities.

Infrastructure Element and Assessment Report/Plan Framework Section

- The City is required to revise its Water Supply Facilities Work Plan (Work Plan) within 18 months after approval of the Lower West Coast (LEC) Water Supply Plan Update by the District's Governing Board. The District's Governing Board approved the LWC Water Supply Plan Update on December 14, 2017. Therefore, the City's Work Plan was to be adopted **by June 14, 2019**; however, the District has not received the updated Work Plan for review to date. The City will need to include updated water demand projections for the identified planning period, identify alternative and traditional water supply projects, and conservation and reuse activities needed to meet the projected future demands. Planning tools are available on the District's website for your use and District Staff are available to provide technical assistance to update the Work Plan, including reviewing draft Work Plans prior to formal plan amendment submittal. The planning tools are located at this link: <https://www.sfwmd.gov/doing-business-with-us/work-plans>.
- The Element and the Section are not based on adequate and relevant data and analysis and is inconsistent with the requirements of Section 163.3177(1)(f), F.S. because the data and analysis is based on the City's 2013 Work Plan. Revise the Element and Section to be based on an updated Work Plan, as described in the comment above.
- Revise Policy 1.2.4 to specify which water supplier in the City is being referred to. Include in the Policy how the supplier plans to increase capacity.
- Revise Objective 1.3 to describe what are considered as non-household consumptive uses. Expand the Objective to include the state of current household consumptive uses.
- Revise Policy 1.3.1 to describe the City's present conservation program, which is being implemented and maintained.

Conservation and Coastal Management Element

- Revise Policies 1.1.5, 1.2.2, and 1.4.3 to include specific ways in which the referenced programs and activities will be conducted or undertaken to achieve water conservation goals. Include when the referenced programs will be created.
- Revise Objective 1.2 to describe how the City works with and supports Collier County and the District to promote conservation and water quality. Include if any conservation efforts are needed to be updated and how they will be updated.

Intergovernmental Coordination Element

- Revise Element to describe how the City coordinates with Collier County (with whom water service is provided to and provides water service to portions of the City), relevant agencies, and partners to ensure water services are planned for, adequately available, and provided to the water customers of the City. The information should address the following:
 - Needs for additional coordination activities.
 - Information on Memoranda of Understanding, bulk service agreements, contracts, etc.
 - Coordination with the LEC Plan Update.
- Revise Policy 1.1.5 to clarify what public facilities are being referenced. Determine which entity is responsible for such facilities.
- Revise Objective 2.5, Policies 2.5.1 to 2.5.3 to reflect the updated data and analysis for the City's current intergovernmental coordination activities. Policy 2.5.3 should be revised to include which water supply activities the City will participate in.

Capital Improvements Element

- Revise Element to include a review of the existing Capital Improvements Element and the 5-Year Schedule of Improvements to identify any water supply projects to be implemented that will be needed in the first five years after adoption of the amendment and the public or private entity responsible for the project, even if the City is not responsible for the projects. This would include any Collier County projects, if applicable.
- Policy 1.2.1 is not supported by adequate and appropriate data and analysis, including the established a City-wide Level of Service Standard (LOS), because the Policy is based on the City's 2013 Work Plan. A LOS should be established for each water provider that serves the City.

General Comments

- Include a policy for all documents that are being incorporated in the City's Comprehensive Plan by reference to identify the document by the title and author(s) of the document and indicate clearly what provisions and date or edition of the documents are being adopted, consistent with the requirements of Section 163.3177(1), F.S.

The District requests that the City forward a copy of the adopted amendments to the District at the following email mailbox address: SFLOCALGOVPLAN@sfwmd.gov. District staff is available to meet by teleconference to go over the comments above and to discuss possible solutions and options to resolve the comments. Please contact me if you have any questions, need additional information, or would like to arrange a meeting.

Sincerely,

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