SOUTH FLORIDA WATER MANAGEMENT DISTRICT

South Florida Water Management District (SFWMD) staff has reviewed the First Sufficiency Responses for the above subject Development of Regional Impact (DRI) and has determined that the following require additional information/clarification.

Question 17: Water Supply

1. Please provide the project's irrigated acreage. This information is necessary to confirm that the project's 1.5 MGD non-potable water demand is reasonable. The statement that "Intuitively, it is unlikely that the 1.0 MGD withdrawal would have any measurable impact on the ENP groundwater levels or seepage in the area, considering the Project is located approximately 1.5 miles east of L-31" cannot be validated without modeling. If modeling indicated that impacts would occur, the applicant would need to identify an alternative water supply source for the 1 MGD portion of the overall 1.5 MGD non-potable demand. Also, the applicant will need to discuss the remaining 0.5 MGD proposed to be provided by a satellite reuse facility with the Miami-Dade Water and Sewer Department (WASD).

It is estimated that \pm 387 acres will be irrigated on this project. The applicant's hydrologic consultant, Hydrological Associates, Inc., will contact the SFWMD to discuss hydrological modeling.

The applicant met with Miami-Dade Water and Sewer Department on January 12, 2007. The satellite re-use facility was discussed at that meeting, but it is uncertain if WASD is comfortable with the concept of installing small satellite re-use facilities to serve individual projects.

We reaffirm our earlier contention that the proposed withdrawal of 1.5 MGD of water will not have an adverse effect on regional groundwater levels or seepage. Existing groundwater withdrawals for agricultural irrigation of the subject property is estimate to be approximately 3.5 MGD. The 1.5 MGD associated with the project is less than half of that volume. In any case, the applicant requests that any detailed modeling or analysis be deferred until an application is submitted for a Water Use Permit.

2. If the existing wells are not proposed to be used to serve the proposed development, they will need to be properly plugged and abandoned, pursuant to Chapter 373.203, F.S.

The existing wells will be properly abandoned.

3. The September 5, 2006 letter provided by the Miami-Dade WASD does not address all of the requirements of Question 17F.1 and 17F.2 of the ADA questionnaire. Since the project site is located outside of the UDB, it appears that the County will need to identify alternative water supply source(s) and make adequate provisions for all necessary capital facilities and associated infrastructure dedicated to serve the proposed development, if it is their desire to approve the proposed DRI. If this is incorrect, please identify the specific water supply sources and infrastructure that will be providing service to the proposed DRI.

The applicant met with Miami-Dade County Water and Sewer Department and Planning Department staffs on January 12, 2007. Representatives of the Regional Planning Council also attended that meeting, at which the county's regional water supply plans

were discussed. It was agreed that the county uses population projections to guide their water supply planning. How that population is distributed is irrelevant; only the total number of people is critical for planning purposes.

Miami Dade County is currently pursuing the renewal of the County's consumptive use permit for its entire regional water system, and is simultaneously proposing to amend its 5-year schedule of Capital Improvements in the Capital Improvements Element as well as its 10-year water supply facilities work plan. See attached Appendix I, showing projected 20-year water supply sources, and Appendix II, showing proposed amendments to Capital Improvements Element. When the consumptive use permit is issued, and the amendments to the Capital Improvements Element and the Water Supply Plan are adopted, an adequate water supply for this project will be available.

In addition, it was explained that all of the county's water treatment plants are interconnected, so that no single plant will be responsible for providing water for this project.