

Waterway Commission

Wetlands Loss; Fill permits; Flood resiliency

1. Underlying perceptions that we would like to confirm or rebut- if not within your ability, can you suggest someone who could speak to the topic

➤ Water quality/ fill permitting

- SJRWMD looks only at water quality when issuing fill permits- if not correct, what is the scope of review?
- Fill permits for wetlands can be obtained without regard to floodplain designation, habitat loss, etc.- just pay to mitigate or mitigate elsewhere
- Mitigation does not necessarily occur in immediate vicinity, or on the same tributary
- How is the loss of filtration value to a particular tributary addressed by remote mitigation?
- COJ does not regulate or permit wetland or floodplain filling but simply relies on SJRWMD permits
- COJ does permit the drainage structures installed on filled sites to insure no offsite flooding
- FEMA requires filling prior to development of lots in the floodplain, or do they only require elevation of the habitable space?

➤ Flood prevention, control, retention capacity and function of wetland

- Wetlands serve a valuable flood prevention/ retention function in their immediate vicinity beyond the water quality filtration aspect – are compensatory ponds always required on-site?

➤ Habitat protection, corridors

- Wetlands serve a wildlife habitat and marine species function beyond just water quality

2. Why do we not apply language of 2030 Comprehensive plan when reviewing applications for all land development permits? I have heard it said that if SJRWMD allows the fill, once it is filled none of the provisions regarding water dependent uses, wetland densities, etc. apply because there is no longer any wetland. If that is accurate, then do these provisions have any applicability at all? Please discuss not just Goal 4 of the CCME, but also Objectives 2.3, 2.7, Goal 3 and implementing objectives and policies, Objective 6.7 and policies, Objective 11.3 and policies.