

ALLIANCE TO PROTECT WATER RESOURCES, INC.

P.O. Box 120444

Clermont, Florida 34711

Lake County Board of County Commissioners

Tavares, Florida 32778

RE: Wellness Way Sector Plan

Commissioners Cadwell, Campione, Conner, Parks, & Sullivan;

The Alliance To Protect Water Resources (APWR) has the following objections to the proposed Wellness Way Sector Plan. Our focus is the lack of specific recommendations for protection of critical water resources in the Sector Plan area, and the lack of specific requirements for the water supply needs of the future. F.S. 163.3245-Sector Plans, calls for long term Master Plans to identify future demand for potable water including water supply development projects and water conservation measures needed. Similarly, Policies setting forth procedures for protection and conservation of specific natural resources are to be identified in the long term Master Plan.

The draft of the Sector Plan identifies the natural resources through the Critical Lands and Waters Identification Project (CLIP) very well. We are concerned with the lack of specific protections within the Master Plan (instead of in DSAPS) for areas identified as highest priority surface waters by CLIP. One is the specific area of wetlands in the northwest corner of the Sector Plan that drain to Lake Louisa, designated as an Outstanding Florida Water. Given the continued negative impacts to the Clermont Chain of Lakes from polluted runoff, stormwater, and low water levels, this contributing source to the Lake must have stronger protection. The natural flow from this area to the west must be preserved. Other areas of wetlands identified by CLIP as high priority natural waters, including some that are hydrologically connected to areas west of US Hwy 27 in the Green Swamp, need to have specific protections. The draft plan states that "no specific recommendations for conservation are offered at this time". Recommendations need to be specific at the Master Plan level. These natural water resources are too important to be left to individual DSAP developments to make policy for their preservation and protection. Policies that govern all of them should be made in the Master Plan for uniformity and assurance that they will be met.

The high recharge areas of the Lake Wales Ridge are identified in the draft plan, but recommendations are mainly about more artificial recharge areas through Rapid Infiltration Basins (RIBs) without addressing other impacts to the high recharge area of the development. The framework map identifies most of that area as Rural Reserve, with very low densities for housing and little commercial development allowed. That does not address the impacts of infrastructure like roads, rail and other transportation corridors,

water and sewer pipes in this area and how that should be mitigated, if at all. Another place where area wide policies need to be formulated for the impacts that new infrastructure will have area wide.

Under Water Supply/Natural Groundwater Aquifer Recharge the future potable water demand for the Sector plan is estimated to be 21.3 million gallons per day at or near build out. It is stated that this future need should be met by continued use of the Floridan aquifer via existing or new wells within the Wellness Way Sector Plan. How will that be possible? What recommendations are proposed for the very real possibilities that the current potable water suppliers, Clermont and Utilities, Inc. and others, will be restrained by upcoming Water Management District restrictions on new and increased withdrawals from the Floridan Aquifer? Another concern is the recommendation for non-potable demands that importing AWS (Alternative Water Supplies) for irrigation and/or aquifer recharge "may be required". For this Sector Plan to be forward looking, able to meet future water demands, the sentence should say "Shall be required", in reference to non-potable water needs being met by AWS.

In the actual Comp Plan Future Land Use Element Goals, Objectives, and Policies for the Wellness Way Sector Plan: Goal I-8, is conflicting language. In Objective I-8.4 ENVIRONMENTAL RESOURCES AND OPEN SPACE, it states under Policy I-8.4.3 that delineation of wetlands and water bodies shall occur in a manner consistent with the Lake County Comprehensive Plan Conservation Element and Federal, Regional, and State regulations. Then....

Under GOAL I-8 for the Wellness Way Sector Plan it is stated that the following objectives and policies Shall govern the Wellness Way area as depicted on the FLUM. Then it states that if the Wellness Way Goals, Objectives, and Policies have a direct or indirect conflict with the goals, objectives and policies now in Lake County's Comprehensive Plan, that the provision in direct or indirect conflict with the Wellness Way goals, objectives or policies will Not apply to Wellness Way. The Lake County Comp Plan was just adopted a few years ago after several years of public and professional input and work. APWR strongly opposes this language of deferral for the proposed Wellness Way Sector Plan goals, objectives and policies under the Lake County Comprehensive Plan.

Also under Objective I-8.4; Policy I-8.4.2; Conservation of Regionally Significant Natural Resources, is language that states "known locations of rare or imperiled species shall be given the highest consideration for protection or preservation within a DSAP". These rare or imperiled species Shall be protected or preserved, not just considered for it.

Under Objective I-8.5: PUBLIC FACILITIES is another example of language that will not adequately protect our water resources. It currently says; "Non-potable demand shall utilize Alternative Water Supplies, such as reclaimed water, when available." The language should reflect the importance of having policies of water conservation. Alternative Water Supplies, such as reclaimed water Shall be required within the Wellness Way Sector Plan for non-potable water needs.

Another big area of concern is the total lack of language dealing with the topography of these ridges and hills that compose a large part of the proposed Sector Plan. There must be policies in the Future Land Use Element that restrict the grading of the hills and the

ridges to a specific height. Clermont has a grading restriction that is enforced for new development. The ridges and hills of south Lake County are what define our area and the beauty of that topography and our beautiful lakes and water resources are a leading reason why people choose to live here. APWR opposes any plan that does not address preservation of the natural contours of the ridges and hills of the proposed Sector Plan area.

In total, APWR, considers this plan to be premature. At this time, the County has already approved 3,500+ residential units and 350,000 sq.ft. of commercial/retail space, waiting to be built, within the boundaries of the Sector Plan area. But the biggest impact of new growth is north of SR 50 encompassing Lake county, Clermont, and Minneola lands with large approved developments that provide for 10,885 residential dwelling units, 850,000 sq.ft. of Office/Professional space(Hills of Minneola DRI), 1.2 million sq.ft. of Industrial space, and 2.120 million sq.ft. of Commercial/Retail space(this includes the 1.2 msq.ft. of Plaza Collina on SR 50). All of this APPROVED development is being built between SR 50 and near the new Minneola Interchange on the Florida Turnpike that breaks ground next spring. It is likely that the new Minneola Turnpike interchange will be the economic driver in south Lake county for years to come. The county and the cities of south Lake county are going to have serious hurdles in finding the necessary financial resources to handle the demands this new development will bring. To add another huge area for new development, regardless of the build out date, is not responsible to us. Considering the lack of development in the previously approved (1998) Horizon West Plan (as of 2010, 5600 dwelling units built, out of apprx. 41,000 approved) in Orange county directly east of the proposed Wellness Way Sector Plan, proposing a similar plan in Lake county seems unwise. The Wellness Way goal of economic development and better jobs coming to Lake county is a needed and good goal, but the space and land to achieve that seem to be available in areas with already approved development. APWR respectfully asks that the Wellness Way Sector Plan not be approved at this time.

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