

Marjorie Holt

From: Marjorie Holt [marjorieholt@earthlink.net]
Sent: Tuesday, September 13, 2016 12:35 PM
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Cc: Lori.Cunniff@ocfl.net; Tim.Hull@ocfl.net; Daniel.Negron@ocfl.net; Tim.Hull@ocfl.net; marjorieholt@earthlink.net
Subject: BCC Agenda Item Harrod Robert Wayne Trustee (SADF-15-10-013) Shoreline Alteration/Dredge and Fill Permit Application

Dear Mayor Jacobs and County Commissioners,

I am contacting you to express concerns regarding the above subject rip rap request including 100 year floodplain discrepancies along many nodes of the Little Econlockhatchee River. On behalf of the Sierra Club Central Florida Group, we are concerned about negative impacts to the Little Econlockhatchee River including the riparian habitat protection zone (RHPZ). Installing stone rip rap creates an unnatural shoreline that could further exacerbate downstream impacts.

Additionally, many homes have been built in the Little Econ riverine system, an Outstanding Florida Water, where FEMA flood plain discrepancies exist in Orange and Seminole Counties. The Harrod property is located adjacent to the Orange/Seminole County Line in an area where lowered 100 year floodplain elevations were adopted from a flawed report produced by Singhofen & Associates in 1985. This report was later adopted as a Flood Insurance Study by Seminole County. Subsequently, development was approved in the Little Econ Basin area resulting in millions of dollars identified to flood proof homes as recommended in Singhofen's 2001 Engineering Study and Drainage Inventory for the Little Econlockhatchee River Basin. Unfortunately, some homes are too expensive for the County to fund flooding relief. These property owners face the financial responsibility to fund their own flood proofing and live with the risk of flood prone areas along the River.

The St. Johns River Water Management District granted the applicant a two year permit duration extension for the construction of River Isle, a 9.77 acre project. The permit for construction is to expire on May 23, 2018. This permit request is separate from the River Isle project; however, we believe the applicant may be stabilizing the shoreline so development of River Isle can commence. The Sierra Club believes that development along the Little Econ River potentially exacerbates problems for flood prone areas, increasing risks for residents and ecological damage along the Little Econ River and the Econ River Basin.

It is unsettling to know that inaccurate 100 year floodplain elevations exist in Orange County as well. Again, we request Orange County correct 100 year floodplain elevations

in the draft flood insurance study. The Sierra Club supports a continuance of this agenda item until the applicant produces required information from Orange County Public Works. Thank you for the opportunity to comment. Please submit this communication to the public record.

Marjorie Holt
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