

WQEA comments - Lee County Dept of Natural Resources

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To:WQEA_2023 <WQEA_2023@floridadep.gov>

EXTERNAL MESSAGE

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Good morning,

Below are my comments for your consideration:

Line 48 - "Natural System" defined as a "man-made" or "altered ecological system" is a little confusing on its own. Understood its intent is to help define the project to obtain WQE credits.

Line 63 - Do we really care if its downstream or upstream within a watershed, as long as it is providing benefit to the receiving waterbody at large? Does it matter if it's an in-line or off-line treatment facility?

Line 81 - What about inter-governmental transfers of credit? No real "sales" involved.

Line 85 - Is there any need if the new stormwater rules are not adopted?

Line 114 - This discourages a governmental agency in building regional projects in a growing area for the economy of scale benefits it receives. The agency should be able to recoup some of the costs through rebatable agreements or other private public partnerships.

Line 254 – see above

Line 311 - Is this sufficient should the owner fail to perform and possibly becomes defunct? What onus is reverted back to the purchaser?

Regards,



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