

Avoidance and Minimization

Response: I recognize that Avoidance and Minimization is required for projects of this scope. However, due to the nature of this property, it is not possible avoid impacts to regulated nontidal resources. The primary fact for this is that the project is to redevelop a golf course that is located within a floodplain in its entirety. Associated with the golf course floodplain are man-made wetlands that are the result of 65+ years of historical development. The development of the golf course resulted in the creation of “water hazards” that include ponds which function as golf course hazards, as well as irrigation ponds to provide adequate water storage for maintaining the greens. These ponds are interconnected via an underground drainage system or open conveyances. In addition, these ponds drain to a single pond on the eastside of the property where there is a water control structure. This water control structure houses a large electric pump that removes excess surface and ground waters that have an adverse effect on play on the golf course. The property is therefore unique in the fact that it is a redevelopment of an area that has been significantly altered by past land use activities.

To develop the entire property located in a regulated floodplain necessitates both the excavation of material and deposition of material (fill) within the floodplain. Either activity will have an unavoidable adverse impact to the man-made wetlands on the golf course. To completely avoid and minimize impacts to these resources is not possible. However, the plans are being revised to remove the stormwater management facilities out of the nontidal wetlands.

You should also be aware that the Federal Emergency Management Agency (FEMA) issued their Conditional Letter of Map Revision (CLOMR) for this property on August 27, 2018. This document was provided to Mr. Imtiaz Choudhry in late August of this year. The conditional approval by FEMA is based on the floodplain study prepared by Rogers Consulting. A copy is enclosed for your review.