



**HUMISTON
& MOORE
ENGINEERS**

COASTAL
ENGINEERING DESIGN
AND PERMITTING

5679 STRAND COURT
NAPLES, FL 34110
PHONE: 239-594-2021
FAX: 239-594-2025
www.humistonandmoore.com

February 19, 2010

Sent via FedEx

Robert Brantly, P. E., Program Administrator
DEP Bureau of Beaches and Coastal Systems
3900 Commonwealth Boulevard
Tallahassee, FL 32399-3000

Reference: Collier County Beach Nourishment Project
Joint Coastal Permit No. 0222355-001-JC
Specific Condition 4.h.
HM File No: 19-043

Dear Bob,

This is a follow up to a conference call which you had with staff of Collier County and the City of Naples on September 23, 2009 regarding the intent of Specific Permit Condition 4.h. of the above referenced permit which states,

h. Outfall Management Plan. *The County shall submit a long-range management plan (including an identification of viable funding sources) for the removal of storm water outfalls from the beach. Submittal of an acceptable plan will be a requirement of the Notice to Proceed for the **second** nourishment.*

As these outfalls are located within the City of Naples, Ron Wallace, Director of the City's Department of Streets and Stormwater, has taken the lead in addressing this requirement. The attached report has been prepared under his direction to address this condition.

The County commissioned a *Conceptual Stormwater Management Analysis of the Naples Beach Outfalls* which was completed in November 2009 and is included as an attachment to this report. That work was conducted for Collier County by Gulfshore Engineering, Inc., a Naples based civil engineering firm, and Coastal Planning and Engineering, Inc. As part of the preparation of the *Conceptual Stormwater Management Analysis of the Naples Beach Outfalls*, Gulfshore Engineering, Inc. looked into the preliminary feasibility of redirecting flow away from the Gulf through the conveyance of water to Naples Bay to the east, or underground aquifer storage. In that Naples Bay is classified as an impaired waterbody, it is speculated that directing additional stormwater flow to the Bay would only add to existing water quality problems. Additionally, finding sufficient property, re-routing the conveyance system and meeting regulatory challenges makes implementation of underground aquifer storage impractical at this time.

Based on the findings and recommendations of the outfall stormwater management analysis, beach profile data collected to date after three years of monitoring, and ongoing water quality monitoring, continued operation of the stormwater outfall system is not expected to result in a

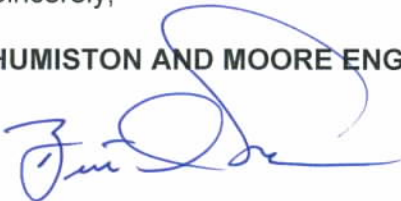
significant adverse impact in terms of erosion of the beaches, sea turtle nesting, lateral pedestrian access along the beach, or water quality. Recognizing the lack of impact and viable alternatives at this time, the City of Naples respectfully requests that the condition for removal of the outfalls be amended to allow the stormwater outfalls to remain, and Specific Condition 4.h. to be considered satisfied.

As stated within the report, the City will continue to comply with Best Management Practices to manage the outfalls in a manner which maximizes the treatment of water before entering the outfalls and continue to monitor the water quality to ensure compliance with standards as set forth by the South Florida Water Management District. Part of the City's ongoing program includes the creation of shallow retention swales designed to attenuate and capture source stormwater runoff entering the City roadways and right of ways. The City currently implements such improvements based on a stormwater tax implemented over 15 years and will continue to pursue ways within the financial means of the City to ensure improved water quality along the beaches as they represent a significant resource for both the City and the County.

Should you have any questions regarding this request, please give me a call.

Sincerely,

HUMISTON AND MOORE ENGINEERS



Brett D. Moore, P.E.

Enclosures

Copy with enclosures to:

Ron Wallace, P.E., City of Naples Director of Streets and Stormwater Department
Gary McAlpin, Collier County Director of Coastal Zone Management