Florida Department of Environmental Protection

Bob Martinez Center
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Rick Scott
Governor

Carlos Lopez-Cantera
Lt. Governor

Jonathan P. Steverson
Secretary

MEMORANDUM

TO: Jeffrey Brown, Deputy General Counsel

THROUGH: Cindy Mulkey, Program Administrator

FROM: Ann Seiler, Case Manager AS

DATE: November 4, 2015

SUBJECT: FPL Okeechobee Clean Energy Center First Completeness Determination

Pursuant to §403.5066, Florida Statutes, the Department of Environmental Protection (DEP), after consulting with the affected agencies, has determined that the Florida Power & Light Company (FPL) Okeechobee Clean Energy Center Site Certification Application is not complete.

Below are requests for additional or clarifying information from:

1. DEP Southeast District (SED) Office;
2. St. Johns River Water Management District; and,
3. Indian River County.

The following agencies found the application complete and/or did not provide comments:

1. Department of Economic Opportunity;
2. Florida Fish and Wildlife Commission;
3. Department of Transportation;
4. Department of State – Division of Historical and Cultural Resources
5. Department of Agriculture and Consumer Services
6. Okeechobee County; and
7. Department of Health.

Agency comments/questions are listed below "*as received*" by the Department. It should be noted that some questions proposed are those for which answers may not be available until the post-certification phase of the certification process, should the project be approved. FPL should identify those items it believes may be more suitably handled through post-certification submittals and propose related conditions of certification.

1. DEP SOUTHEAST DISTRICT - Submerged Lands and Environmental Resource Program (ERP)

A. Please provide documentation of the applicant's real property interest (e.g. warranty deed) over the land upon which the activities subject to the application will be conducted. Refer to 4.2.3 A.H. Volume I, for a list of acceptable forms of documentation that may be submitted. [62-330.301(1); 62-330.302(1), F.A.C.; 4.2.3 A.H. Volume I]

B. The submitted figures and information suggests that there will be no direct impacts to Wetlands K, J or N for construction of the OCEC Unit 1; however, there is insufficient detail provided on the submitted plans to show that there will be no impacts to these wetlands. Aside from noting that these areas are encompassed in the "Open Space," please provide additional notation on the plans that there will be no disturbance to the soils or vegetation within this area so that the Department has assurance that these wetlands will remain undisturbed. [62-330.301(1); 62-330.302(1), F.A.C.]

C. The figures and submitted information do not sufficiently address adverse secondary impacts to onsite and offsite wetlands. The submitted plans show that a 25-ft upland buffer will be provided around Wetland D in the NW section of project site; however, information regarding how this upland buffer will remain undisturbed in perpetuity has not been submitted. Please provide details for how this upland buffer will remain undisturbed in perpetuity. If you decide to record a conservation easement over this buffer, then please contact Monica Sovacool, FDEP Southeast District, at (561) 681-6698 or Monica.Sovacool@dep.state.fl.us for a list of required documents to record a conservation easement dedicated to FDEP. If other means are proposed, such as fencing with signage, then please revise the plans to depict this information.

Additionally, there is no proposed upland buffer surrounding the southern offsite wetland, Wetland O2-South, while the proposed construction activities appear to closely abut this wetland. Due to the nature of the proposed development, is anticipated that adverse secondary impacts (e.g. increased noise, light penetration, human disturbance) could extend a minimum of fifty (50) feet into Wetland O2-South where an undisturbed upland buffer is not proposed. Please provide details regarding whether or not an upland buffer is feasible adjacent to this wetlands, or alternately, please provide mitigation for adverse secondary impacts to this wetland. Please contact Monica Sovacool to discuss the potential Uniform Mitigation Assessment Method (UMAM) scores for adverse secondary impacts. [62-330.301(1); 62-330.302(1), F.A.C., 10.2.7(a), 10.2.7 & 10.3, A.H. Volume I]

D. Pursuant to section 10.2.2.2 A.H. Volume I, alterations in drainage ditches that were constructed in uplands will not be required to comply with the provisions of sections 10.2.2 through 10.2.2.3, 10.2.3 through 10.2.3.7, and 10.2.5 through 10.3.8, unless those ditches provide significant habitat for endangered or threatened species. Please provide details to support or refute that the ditches provide significant habitat for

the endangered and threatened species listed in your submittal. If the ditches are determined to not provide significant habitat to the listed species, the please revise your mitigation proposal to exclude the impacts to these ditches. Please note that a site visit may need to be conducted to verify this information. [10.2.2.2 A.H. Volume I]

E. Pursuant to Section 10.2.3.6, A.H. Volume I, in reviewing and balancing the criterion regarding historical and archaeological resources in paragraph 10.2.3(f), the Department will evaluate whether the regulated activity located in, on, or over wetlands or other surface waters will impact significant historical or archaeological resources. Staff acknowledges that a Phase I Archaeological Survey has been completed, as described in the submittal. Please provide written assurance from the State Division of Historical Resources that the project will not adversely affect any archeological/historical resources. [10.2.3.6 and 10.2.7(c), A.H. Volume I]

F. It appears that the project may significantly reduce onsite and offsite wetland hydroperiods by controlling the surface water management system below the determined seasonal high water elevations of the onsite wetlands and diverting surface water flow that adjacent wetland receive in pre-development. However, the extent is not yet known because sufficient details regarding the proposed surface water management system were not provided. Additionally, the SHWL of the onsite and offsite wetlands that may be affected have not been field-verified. Groundwater depression and diversion of surface water flow from the proposed project may interrupt hydrologic patterns that sustain adjacent wetlands. The effects of your proposed hydrologic disturbance may confound succession patterns in the natural community.

Please provide sufficient details for the stormwater management system, including the invert and outfall elevations for all structures, so that staff can determine if the system will cause drawdown in adjacent wetland hydroperiods. Also, provide reasonable assurance that water table depression and surface water diversion will not result in adverse impacts to wetlands. Provide a map of the pre- and post-development contributing basin for each onsite and offsite wetland that receives runoff, or surficial flow (if relevant), from the site of the proposed project. Provide sufficient site-specific data (e.g., seasonal high and low water elevation estimates, water budget, rainfall patterns, ground water flow model, water table contour maps, etc.) to model the effects of the surface water management system on wetland hydroperiods and existing plant communities. If you cannot avoid hydroperiod impacts, then estimate and plot the impact area and propose suitable mitigation.
[62-330.301(1)(a) & 62-330.302(1)(a), F.A.C.; 10.3 A.H. Volume I]

G. Pursuant to 10.2.7(d), A.H. Volume I, please provide reasonable assurance that the future construction on the FPL site will not result in adverse impacts to wetlands and other surface waters. Specifically, how will these adverse impacts be offset if the proposed onsite mitigation area will not sufficiently offset all current and future proposed impacts? Please provide details for offsite mitigation areas or mitigation banks within the

same drainage basin that may be considered for these future phases. [62-330.301(1); 62-330.302(1), F.A.C., 10.2.7(d) & 10.3, A.H. Volume I]

H. The submitted mitigation plan describes enhancement of wetlands and preservation of uplands within the 376-acre mitigation site; however, it is not yet known if enhancement of the wetlands is appropriate given the existing high quality of these system that is described in the submittal and the proposed limited treatment (e.g. once a year for two years) of nuisance and invasive exotic vegetation. Please contact Monica Sovacool, FDEP Southeast District, at (561) 681-6698 or Monica.Sovacool@dep.state.fl.us, to coordinate a site visit to the mitigation area.

Depending on the degree to which nuisance and invasive exotic vegetation is present within the various systems in the mitigation area, it may be more appropriate to propose preservation of the entire mitigation area instead of enhancement. Once the site visit has been conducted, this can be further explored. Please note that preservation of a mitigation area, and specifically this proposed 376-acre area, should be accompanied by a thorough and detailed comprehensive management plan that includes management of nuisance and invasive exotic vegetation as part of the plan. The management plan should provide details for how nuisance/exotics will be managed in perpetuity, not just the first five years, and appropriate management activities, above and beyond nuisance/exotics control, should be identified up front. If enhancement is determined to be appropriate, then the submitted enhancement plan will likely not be sufficient and revisions to the plan will be necessary, including a cost estimate for the appropriate enhancement activities. If the cost estimate exceeds $25,000, then proof of financial responsibility will be necessary, pursuant to 10.3.7 A.H., Volume I.

Additionally, it does not appear to be appropriate to assign mitigation credit to the preservation/enhancement of the perimeter ditches located on the west and south sides of the mitigation area as the function of these ditches is such that they adversely impact or alter the connected and adjacent wetland systems. The Department advises these ditches be omitted from the submitted UMAM analysis; however, they may still be included in the conservation easement area if the applicant wishes.

Furthermore, staff cannot determine if the submitted UMAM scores are sufficient until a site visit to the mitigation and impact areas has been conducted. From an initial review, it appears the Location and Landscape scores for at least part of the mitigation area will be lower in the “With Preservation” condition due to the barriers created by the proposed construction and future construction as well as decreased wildlife corridors that this construction will cause. It also appears that the “without Preservation” condition score for Community Structure may be too high. The UMAM scores can be further reviewed once the site visit has been completed. Please note that a conservation easement over the mitigation will be required as assurance the area will remain preserved in perpetuity. A list of required documents for this conservation easement will be provided once the full scope of the mitigation plan is realized.

[62-330.301(1); 62-330.302(1), F.A.C., 10.2.7(a); 10.3, A.H. Volume I]

I. Please indicate the depth of the proposed wet detention ponds. Section 8.8 Pond Depth - per Applicant Handbook indicate that detention systems shall provide for a maximum pond depth of 12 feet and a mean depth (pond volume divided by the pond area at the control elevation) between 2 and 8 feet. Provide assurance the pond depth will not penetrate into a zone of poorer water quality in terms of chlorides.

2. ST. JOHNS RIVER WATER MANAGEMENT DISTRICT (DISTRICT)

The St. Johns River Water Management District's (SJRWMD) comments on FPL Okeechobee Clean Energy Center Application (dated September 25, 2015) are below. The information requested below is required in rule 40C-2.301, Florida Administrative Code (F.A.C.), and the SJRWMD Applicant's Handbook: Consumptive Uses of Water (A.H.) as adopted by reference in rule 40C-2.101, F.A.C.

A. Please use a minimum 5-year average May head (e.g., May 2003-2007) for calculating interference with existing legal users. May 2005 potentiometric heads were higher than normal and thus would minimize the effect of drawdowns. However, as discussed during our pre-application meetings, you may use an average annual withdrawal rate (9 mgd instead of peak 11 mgd) during this analysis since you have indicated that the peak amount would not be used during this time of year. [Section 1.3.7.2, section 2.3 (a, f, g, h, i) and section 3.6, A.H.]

B. Please provide a surficial drawdown map, drawn to a clearly visible scale, showing labeled contour intervals. In addition to the on-site mitigation area, there are wetlands immediately adjacent to the project that are of concern. Please clarify the surficial drawdown within the on-site mitigation area as well as these adjacent wetlands. [Section 2.3 (f, g), section 3.5, section 3.7, A.H.]

C. Please provide a monitoring and mitigation plan to address potential interference with existing legal uses. Because of limited local information, District staff recommends that an Aquifer Performance Test (APT) analysis(es) be conducted to evaluate / compare assumptions of the submitted modeling and associated impacts evaluations. District guidelines for developing and conducting an APT are provided in Appendix D of the Applicant's Handbook. Modeling assumptions and impacts evaluations should be re-assessed with the additional site specific APT data, if the results are significantly different than the regional values used initially. [Section 1.3.7.2, section 2.3 (a, f, g, h, i) and section 3.6, A.H.]

D. Please provide a more detailed, quantitative alternative source feasibility analysis, including an analysis of the use of the LFA or APPZ. The submittal references higher withdrawal rates, increased deposition and higher treatment costs as prohibitive to the use of the APPZ or LFA. The cooling tower makeup water is designed to use water from the UFA with an estimated TDS of 1,740 ppm (page 4-15). As discussed, water

quality of the UFA may be significantly better than this assumed amount and the value you have assumed is more indicative of the poorer quality water from the APPZ since the modeled water balance indicates approximately half of the water will originate from the APPZ . As required by District criteria, you must use the lowest quality source, if technically, economically, and environmentally feasible. It appears your analysis supports the potential use of a lower quality source (i.e., the APPZ). Please consider deepening all or some of the proposed UFA wells into the APPZ. In addition, use of the APPZ would likely decrease potential interference to users of the UFA. If it is your position that this lower quality source is infeasible, please provide quantitative information (i.e, calculated treatment costs, number of pounds of increased deposition, how much additional saline water intrusion would result, quantity of additional water required, etc.) supporting your evaluation.

E. Your evaluation of the surface water sources currently available is acceptable. Please note that further evaluation of use of lower quality sources, including the Grove Land Reservoir and Stormwater Treatment Area, may be required in the future as a permit condition. [Section 2.3 (a, e, f, g, h), section 3.7, A.H.]

F. Please provide proposed well casing diameter, cased depth, total depth, pump capacity (gpm) and type, and flow measurement method (i.e, flow meter or alternative method) for all wells proposed. As discussed, we understand this may change during design & construction; however, we will update to final construction specs at that time. [Section 2.3 (a, d), A.H.]

G. Please clarify the construction dewatering request including the amounts, location, schedule, duration, and routing for each dewatering activity. [Section 2.3 (a, f, g, h), section 3.7, A.H.]

H. What is the total irrigated area associated with the power plant (and corresponding to requested 20 gpm irrigation water use)? [Section 2.3 (a), A.H.]

I. Please provide more detail on process water use and efficiency and conservation, including:

1) What are the operating parameters for the cooling tower, that is, the estimated TDS for makeup water and the TDS threshold for discharge or blowdown.

2) Please provide your analysis for determining the five cycles of concentration (water use efficiency in the cooling tower). Please consider the feasibility of increasing the number of cycles. [Section 2.2, 2.3 (a), A.H.]

3. INDIAN RIVER COUNTY (IRC)

(Advisory) Staff acknowledges that FPL is working with the County on an impact fee issue that is subject to the FPL/IRC franchise agreement and on a future ILA regarding

special emergency services. It is staff s understanding that these issues will be addressed by mutual agreement prior to commencement of project construction.

A. Traffic (Public Works Director Chris Mora, P.E.: 772-226-1234) The applicant and its representatives have coordinated with Indian River County Traffic Engineering and submitted a traffic impact study. Based on that study, Traffic Engineering and the Public Works Director have determined that an eastbound right turn lane on SR 60 at the Main Project Entrance is required. That required improvement needs to be reflected in a revised application section 5.7.2, current page 5-18. Section 6.9.1 (current page 6-20) and possibly other figures and/or sections need to be updated accordingly.

B. Emergency Services (Emergency Services Director John King: 772-226)

1) Section 3.2.8.3 Medical Facilities: The application states "There are nine hospitals within 30 miles of the Site." A MapQuest search for road miles, with a starting point at the Main Project Road/SR 60 entrance, yields the following:

- Indian River Medical Center is 25.2 miles
- Sebastian River Medical Center is 34.1miles
- Lawnwood Regional Medical Center is 35.9 miles
- Raulerson Hospital is 42.2 miles
- Florida Hospital Kissimmee is 66.3 miles

It appears that the section needs to be revised accordingly. With respect to Indian River County Fire Rescue Station 7, the mileage appears accurate.

2) (Advisory) Staff agrees with FPL attorney Michael Tammarro's email to Indian River County staff dated September 30, 2015 wherein he suggests: 1) a conference call with Indian River County risk management representative and 2) a future ILA (inter-local agreement) for reimbursement related to special emergency services.

C. Utility Services/Water Supply (Utility Services Director Vincent Burke: 772-226-1830)

1) Figure 1 under Appendix 10.9 should identify "Indian River County".

2) Figure 4.5-1, it appears the water balance from the cooling tower may be a typographical error (466000).

3) Wastewater from the water treatment system will be routed to the injection wells. As noted in the water balance on Figure 4.5-1, the peak short duration industrial wastewater sent to injection well from water plant is estimated

to be 8.68MGD when 11 MGD is being pulled from the UFA. This is very close to a single pass through scenario.

4) Sample flows for domestic sanitary uses are shown on 4-16; therefore, the industrial/process WW flows (aka water plant effluent) should also be noted in the body of the text as well (i.e. Average injection 1.92MGD, max month of 2.33MGD & 8.68MGD Peak).

5) Figure 8 under Appendix 10.9 should be extended to show the impacts of the 1-foot drawdown contour.

6) Also, if the 1-foot drawdown contour is to extend beyond the ECFS groundwater model, is it accurate to only use the subject model or should it be combined with the SEC model (which covers the east portion of Indian River County)?

7) When firing ULSD oil, when natural gas is not used, emissions of NOx will be controlled using water injection and SCR. How much additional water (process or treated) will be used in this effort?

8) "A supplemental SCA describing the solar facility layout, engineering design, drainage system, and construction specifications would be submitted prior to development of the future solar generation area of the Site." How much process/treated water, if any, will be used in the future solar panel array for cooling? If water will be used, will this future additional water be factored into the CUP allocation being requested now?

9) Cooling Towers

- Cooling tower bactericides used in controlling microbial growth in the draft cooling tower should be evaluated to take into account drift that may affect neighbors, cattle, drivers on SR60, and visitors to the Fort Drum conservation area.
- Cooling towers, evaporative condensers, and fluid coolers use a fan to move air through a recirculated water system. This allows a considerable amount of water vapor and sometimes droplets to be introduced into the surroundings, despite the presence of drift eliminators designed to limit droplet release. This water may be in the ideal temperature range for Legionnaires' disease bacteria (LDB) growth, 20°-50°C (68°- 122°F). Good maintenance is necessary, both to control LDB growth and for effective operation. Does the report address either of these issues?
- OCEC Unit 1 will utilize water from the UFA, with the expected water quality resulting in deposition ranging between 2.6 and 6 kg/ha/month within 2,000 meters of the cooling towers. These values are within the range of natural background deposition and are not anticipated to result in any adverse impacts to vegetation in the vicinity. Are these figures based on virgin process water or 5th cycle concentration?

10) If a regional WW facility becomes available at the OCEC, should connection of the facility to domestic WW be a condition of the certification/permit?

11) Have OCEC's engineers looked at the feasibility of going to a "zero liquid discharge" system for the RO/NF concentrate (Water plant wastewater) such as the anion exchange system in use at Palm Coast Utilities?

12) Section 5.3: What is the age of existing 10" artesian well? Please confirm the casing is in good shape and that there are no lateral leaks of artesian water.

13) Section 5.3.1 states "Dewatering of the surficial aquifer will have no adverse impact on water levels or water supplies in the Upper Floridan Aquifer because the two aquifer systems are hydrologically separated by almost 300 feet of a clay-rich confining unit. What effect, if any, will the "dewatering of the SAS" have on the Fort Drum Marsh Conservation Area? As noted, the SJRWMD's Fort Drum Marsh Conservation Area is located adjacent to the Site, on the eastern boundary.

14) Section 6.8 should list IRC Utilities which has l MGD reuse available now. Transmission logistics from IRC to OCEC remain (to be determined).

15) Report states "Additionally, using groundwater with higher chloride concentrations could reduce acceptable cooling tower cycles of concentration which in turn would increase the amount of groundwater withdrawals required for makeup and increase the discharge rate to the injection wells." Agreed, but additional process treatment technologies exist that can lessen chloride concentrations prior to cooling tower use. Has use of such technologies been considered?

D. Planning (Community Development Director Stan Boling, AICP 772-226-1253)

There are no planning-related issues with respect to the subject certification application.

From:	Callie Register
To:	Seiler, Ann
Cc:	"Colios, Thomas"; Karen Ferguson; Mary Ellen Winkler; Richard Burklew; Patricia Renish
Subject:	SJRWMD Completeness Review for FPL - Okeechobee Clean Energy Center Application
Date:	Monday, October 26, 2015 12:43:24 PM
Attachments:	image001.png image002.png

Ms. Seiler,

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   [Section 2.2, 2.3 (a), A.H.]

Callie Register, P.E.
Hydrologist PG/PE
Regulatory, Engineering and Environmental Services
St. Johns River Water Management District
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Email: cregister@sjrwmd.com
Website: floridaswater.com
Connect with us: Newsletter, Facebook, Twitter, YouTube

We value your opinion. Please take a few minutes to share your comments on the service you received from the District by clicking this link

Notices

- Emails to and from the St. Johns River Water Management District are archived and, unless exempt or confidential by law, are subject to being made available to the public upon request. Users should not have an expectation of confidentiality or privacy.
- Individuals lobbying the District must be registered as lobbyists (§112.3261, Florida Statutes). Details, applicability and the registration form are available at http://floridaswater.com/lobbyist.

INDIAN RIVER COUNTY
COMMUNITY DEVELOPMENT DEPARTMENT
1801 27th Street, Vero Beach FL 32960
772-226-1237 / 772-978-1806 fax
www.ircgov.com

October 21, 2015

Ann Seiler
Florida Department of Environmental Protection
Siting Coordination Office
2600 Blairstone Road, MS 5500
Tallahassee, FL 32399-2400

RE: Indian River County Staff Completeness Review Comments on Site Certification Application – FPL Okeechobee Clean Energy Center (PA15-58)

Dear Ms. Seiler:

Indian River County staff appreciates the opportunity to provide completeness and information-related comments on the subject powerplant application. Staff also acknowledges diligent efforts by FPL representatives to coordinate multiple issues with county staff.

The subject powerplant facility is proposed to be located in northeastern Okeechobee County near the Okeechobee/Indian River County line, and will be accessed solely through Indian River County to SR 60. Impacts will occur during project construction and operation. Indian River County staff have reviewed the FPL site certification application submitted September 25, 2015 and offer the following comments.

Traffic (Public Works Director Chris Mora, P.E.: 772-226-1234)

1. The applicant and its representatives have coordinated with Indian River County Traffic Engineering and submitted a traffic impact study. Based on that study, Traffic Engineering and the Public Works Director have determined that an eastbound right turn lane on SR 60 at the Main Project Entrance is required. That required improvement needs to be reflected in a revised application section 5.7.2, current page 5-18. Section 6.9.1 (current page 6-20) and possibly other figures and/or sections need to be updated accordingly.

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   - Cooling tower bactericides used in controlling microbial growth in the draft cooling tower should be evaluated to take into account drift that may affect neighbors, cattle, drivers on SR60, and visitors to the Fort Drum conservation area

- Cooling towers, evaporative condensers, and fluid coolers use a fan to move air through a recirculated water system. This allows a considerable amount of water vapor and sometimes droplets to be introduced into the surroundings, despite the presence of drift eliminators designed to limit droplet release. This water may be in the ideal temperature range for Legionnaires' disease bacteria (LDB) growth, 20°-50°C (68°-122°F). Good maintenance is necessary, both to control LDB growth and for effective operation. Does the report address either of these issues?

- OCEC Unit 1 will utilize water from the UFA, with the expected water quality resulting in deposition ranging between 2.6 and 6 kg/ha/month within 2,000 meters of the cooling towers. These values are within the range of natural background deposition and are not anticipated to result in any adverse impacts to vegetation in the vicinity. Are these figures based on virgin process water or 5th cycle concentration?

10. If a regional WW facility becomes available at the OCEC, should connection of the facility to domestic WW be a condition of the certification/permit?

11. Have OCEC's engineers looked at the feasibility of going to a "zero liquid discharge" system for the RO/NF concentrate (Water plant wastewater) such as the anion exchange system in use at Palm Coast Utilities?

12. Section 5.3: What is the age of existing 10" artesian well? Please confirm the casing is in good shape and that there are no lateral leaks of artesian water.

13. Section 5.3.1 states "Dewatering of the surficial aquifer will have no adverse impact on water levels or water supplies in the Upper Floridan Aquifer because the two aquifer systems are hydrologically separated by almost 300 feet of a clay-rich confining unit. What effect, if any, will the "dewatering of the SAS" have on the Fort Drum Marsh Conservation Area? As noted, the SJRWMD's Fort Drum Marsh Conservation Area is located adjacent to the Site, on the eastern boundary.

14. Section 6.8 should list IRC Utilities which has 1MGD reuse available now. Transmission logistics from IRC to OCEC remain (to be determined).

15. Report states "Additionally, using groundwater with higher chloride concentrations could reduce acceptable cooling tower cycles of concentration which in turn would increase the amount of groundwater withdrawals required for makeup and increase the discharge rate to the injection wells." Agreed, but additional process treatment technologies exist that can lessen chloride concentrations prior to cooling tower use. Has use of such technologies been considered?

Planning (Community Development Director Stan Boling, AICP 772-226-1253)

There are no planning-related issues with respect to the subject certification application.

(Advisory) Staff acknowledges that FPL is working with the County on an impact fee issue that is subject to the FPL/IRC franchise agreement and on a future ILA regarding special emergency services. It is staff's understanding that these issues will be addressed by mutual agreement prior to commencement of project construction.

Again, Indian River County staff appreciates the opportunity to review and comment. If you have any questions, please do not hesitate to contact me at (772) 226-1253.

Sincerely,

Stan Boling, AICP
Community Development Director, Indian River County

cc: Board of County Commissioners (via e-mail)
Joe Baird, County Administrator (via e-mail)
Mike Zito, Assistant County Administrator (via e-mail)
Dylan Reingold, County Attorney (via e-mail)
Bill DeBraal, Deputy County Attorney (via e-mail)
Jason Brown (via e-mail)
Vincent Burke, P.E. (via e-mail)
Arjuna Weragoda, P.E. (via e-mail)
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Mike Busha, Treasure Coast Regional Planning Council (via e-mail)