## QUESTION 15 ENVIRONMENT AND NATURAL RESOURCES: SOILS

VOLUSIA COUNTY GROWTH AND RESOURCE MANAGEMENT (LETTER DATED JANUARY 15, 2008)

<u>Pre-application Conference Items 1 - 5, Volusia County Comment Letter Dated October 4, 2006:</u> The applicant has previously been made aware that agreement on the assumptions and methodologies had not been reached, pursuant to State Statute (Section 380.06(7)(a)), prior to preparing the Application for Development Approval (ADA) for the following items. These issues were previously raised by County staff during the pre-application conference charrette and the response by the County in writing to the Pre-application Conference Summary.

3. Conducting a detailed geotechnical analysis or other appropriate analysis to assess impacts to ground water quality and potential drawdown to wetlands due to the extensive wellfield development associated with the DRI; and

<u>Update:</u> The applicant has included sub-surface soil analysis and ground water quality assessment with this sufficiency response which can be considered a sufficient response at this time.

The Applicant considers the supplemental material provided in RAI #2 sufficient to answer soils and hydrogeology questions at this time.

<u>Question 15, Soils, D. 15-1:</u> As noted above, please clarify whether the development plan contemplates excavating the site (particularly wetlands) to generate fill in addition the area/volume needed to address stormwater management requirements. Impacts to wetlands for this purpose clearly do not meet the avoidance and minimization criteria of the minimum standards.

Based on the currently contemplated revised Development Plan, some necessary on-site excavations will occur to construct the stormwater management system. Excavations within wetlands have been minimized to the greatest extent practicable as evidenced in Map H, Master Development Plan (Revised). The Applicant recognizes the potential impacts of excavations proximate to retained and/or restored wetland systems and the Applicant will address these technical issues and hydro-geologic interactions more fully as part of final design based on final site geometry, further geotechnical exploration and in compliance with the requirements of the St. Johns River Water Management District and City of Edgewater criteria. At this point in time, it can be estimated that approximately 8,000,000 cubic yards of material will be excavated from proposed on-site stormwater and floodplain management lakes to be utilized to elevate the development areas included on Map H, Master Development Plan. The area and volume relationships of the proposed stormwater management requirements are outlined in Question 19.