

FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application for certificate to provide
wastewater service in Charlotte County, by
Environmental Utilities, LLC

Docket No.: 20240032-SU

**PALM ISLAND ESTATES ASSOCIATION, INC.'S NOTICE OF FILING PRE-FILED
TESTIMONY OF ELLEN HARDGROVE**

PALM ISLAND ESTATES ASSOCIATION, INC., gives notice of filing the attached Pre-
Filed Testimony of Ellen Hardgrove.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served and filed

this 1st day of November 2024 to:

Dean Mead
420 S. Orange Avenue
Suite 700
Orlando, FL 32801

Linda Cotherman
P.O. Box 881
Placida, FL 33946

Caroline Dike, Esq.
Major Thompson, Esq.
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0850

Robert Volpe, Esq.
Holtzman Vogel PLLC
119 S. Monroe Street
Suite 500
Tallahassee, FL 32301

KELSKY LAW, P.A.
Counsel for Palm Island Estates
Association, Inc.
150 S. Pine Island Road
Suite 300
Plantation, FL 33324
954.449.1400
bradkelsky@kelskylaw.com

BY: /s/ Brad E. Kelsky
BRAD E. KELSKY
FBN: 0059307

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

IN RE: Application for certificate to provide
wastewater service in Charlotte County, by
Environmental Utilities, LLC

DOCKET NO. 20240032-SU

DIRECT TESTIMONY

OF

ELLEN HARDGROVE, AICP

on behalf of

Palm Island Estates Association, Inc.

1 **Q. Please state your name, profession and address.**

2 A. My name is Ellen Hardgrove. I am a certified planner and my professional address is 315
3 Ivanhoe Blvd. NW, Orlando, FL 32804.

4 **Q. State briefly your educational background and experience.**

5 A. I have a Bachelor of Arts degree in Economics from Clemson University and a Master's
6 degree in Urban and Regional Planning from Florida State University. I have extensive,
7 direct and practical knowledge of land planning, including understanding comprehensive
8 planning, land development regulations, approval processes and the people/entities
9 involved with same.

10 **Q. Have you previously appeared and presented testimony before any regulatory
11 bodies?**

12 A. Yes, I've testified as a city planner for the City of Edgewood and have given testimony for
13 FDOT, Central Florida Expressway Authority, PSC and Sanford Airport Authority.

14 **Q. What is the purpose of your direct testimony?**

15 A. The purpose of my direct testimony is to discuss how provision of central sewer service in
16 the proposed service area is inconsistent with Charlotte County's Comprehensive Plan and
17 shows a lack of need for sewer service in the proposed service area.

18 **Q. Are you sponsoring any exhibits?**

19 A. Yes, I am sponsoring one exhibit. Exhibit EH-1 is my affidavit dated October 30, 2024
20 (with exhibits).

21 **Q. Does this exhibit set forth your opinions with respect to the Environmental Utilities'
22 application.**

23 A. Yes.

1 **Q. Was this Exhibit prepared by you?**

2 A. Yes, it was.

3 **Q. Does that conclude your direct testimony?**

4 A. Yes, it does.

Ellen S. Hardgrove, AICP, Planning Consultant, Inc.

October 30, 2024

Brad E. Kelsky, Esq.
Kelsky Law, P.A.
150 South Pine Island Road, Suite 300
Plantation, FL 33324

Re: PSC 20240032-SU

Dear Mr. Kelsky:

This report presents an evaluation of an application to provide sewer service on the Bridgeless Barrier Islands of Charlotte County, Florida, known as 20240032-SU, as was submitted by Environmental Utilities (EU), LLC, February 2024. The proposed utility service area is depicted in Exhibit 1 of this report.

My analysis is grounded in 42 years of experience in land planning, including 29 years as a consultant specializing in land use/development potential analysis, local government planning, and eminent domain issues. This experience has resulted in my extensive knowledge and understanding of comprehensive planning, land development regulations, and resources related to environmental factors.

This application is a resubmittal of a 2022 proposal (Application 20200226-SU), which was rightly denied by the Florida Public Service Commission (PSC) based on findings that there was no need for service and it was not in the public interest. The PSC determined, 1) there was insufficient evidence of demand for service; 2) there were no immediate health concerns; and 3) there were no regulatory mandates for a sewer system. The PSC also made a determination that the application was inconsistent with both the Charlotte County Sewer Master Plan and the Charlotte County Comprehensive Plan.

Despite the PSC's 2022 denial, the 2024 application continues to rely on a flawed characterization of Need for Service. The applicant's assertion that the conversion of septic tank to sewer is a County priority based on a County 2020 Bulk Sewer Treatment Agreement and the County Sewer Master Plan is misguided.

Contrary to the applicant's claim, the Bulk Sewer Treatment Agreement between EU and Charlotte County is not a criterion for the County's prioritization to convert the septic tanks to sewer; those criteria are in the County Master Sewer Plan. Moreover, the Bulk Sewer agreement may not even be valid as it is contingent upon the Florida Department of Environmental Protection (FDEP) granting the necessary easements for EU's utility lines within Don Pedro State

Park. Section Two, General Conditions (B) of the agreement specifically states that the County agrees to provide bulk sewer treatment only if EU obtains easements through Don Pedro Park. Attainment of the easements has not been documented by EU, and such attainment is doubtful given the substantial and long-term damage they would cause to the park's environmentally unique and irreplaceable lands, to be detailed later in this report. Thus, any reliance on the Bulk Sewer Treatment Agreement to justify need for service is unfounded.

EU's assertion that the conversion of septic tanks to sewer aligns with Charlotte County's Sewer Master Plan has already been refuted by the PSC. There have been no subsequent amendments to the Master Plan that added the project to the Sewer Master Plan.

A 2024 change to the Sewer Master Plan priority criteria makes the inconsistency with the Sewer Master Plan even more pronounced; i.e., the County replaced the assumption-based priority criteria with evidence-based decision-making, specifically mandating water quality data to justify septic tank to sewer conversions. Board of County Commissioner Tiseo effectively summarized this replaced criterion at the July 16, 2024 Utilities Department Quarterly Update Meeting [video position 2:19:57]:

"I made this crystal clear several times from the dais. I want that water testing done that represents a fair representation of what's existing out there, so in my mind I can understand the existing condition of water quality in regards to the septic tanks that are out there." Commissioner Tiseo

The water he was referencing was that proximate the Bridgeless Barrier Islands. Commissioner Dougherty agreed: [video position 2:21:24] :*"The testing you were talking about makes sense."* The EU application fails to document that water quality has been degraded by the existing septic tanks on the barrier islands.

As stated at the August 19, 2024 BCC meeting, the County has yet to contract for water quality testing. Dave Watson, Charlotte County Utilities Director, stated that a year or two of water quality testing would be needed to provide good base information.

Given the absence of necessary water quality data, EU's claim of alignment with the Sewer Master Plan is unsubstantiated.

EU's submittal of Resolution 2023-155 claiming consistency with the County Comprehensive Plan is meaningless. The resolution is fundamentally flawed and lacks factual basis. The resolution merely asserts consistency with the Comprehensive Plan without providing supporting evidence.

It is interesting to note that the Resolution was adopted at the September 12, 2023 BCC meeting as part of a consent agenda. Being on the consent agenda compromised transparency and

eliminated opportunities for public engagement and consideration of concerns, resulting in the potential to obscure the PSC's determination of Comprehensive Plan consistency.

The mere placing it on the consent agenda violated the County's Comprehensive Plan policies that safeguard private property rights and ensure that they are considered in local decision-making processes. These policies were adopted by the BCC in December 2021 in the Comprehensive Plan's Property Rights Element.

Public participation at the meeting would have exposed the inaccuracies of the Resolution. For example, the first "Whereas" clause of the Resolution's preamble is inconsistent with Comprehensive Plan Coastal Policy 3.2.7:

"WHEREAS, Charlotte County strongly supports the installation of a central wastewater system for the Barrier Islands to eliminate septic tanks."

Coastal Policy 3.2.7, which will be detailed later in this report, prohibits installation of a central wastewater system for the Bridgeless Barrier Islands; i.e., the location of EU's service area.

The following "Whereas" clause falsely implies that the Sewer Master Plan's 5-Year Improvement Plan includes a septic-to-sewer conversion on the Bridgeless Barrier Islands:

"WHEREAS, the 2017 Charlotte County Sewer Master Plan clearly indicates the provision of sewer services to the Barrier Islands is within the 5-Year Improvement Plan."

A simple review of the County Sewer Master Plan will show the only listed projects related to the Bridgeless Barrier Islands in the Master Plan's 5-Year Improvement Plan are the conversions of existing private wastewater treatment plants on Knight and Little Gasparilla Islands to pump stations and conveyance to an existing system: Knight Island Utilities (W2) and Hideaway Bay Beach Club (W5). Neither of these are the proposed EU project.

Not only does the 2017 Charlotte County Sewer Master Plan not indicate EU's proposed system within the 5-Year Improvement Plan, the conversion of septic tanks to sewer on the Bridgeless Barrier Island is not even included in the 10-Year or 15-Year (Build-out) Improvement Plans as listed in Tables 4-5, 4-6, and 4-7, and Figure 4-10 of the master plan.

Another "Whereas" clause claims the health, safety, and welfare of Charlotte County will be enhanced by the construction of a central sewer system on the Barrier Islands; this is totally unjustified.

"WHEREAS, the Board finds that the health, safety, and welfare of Charlotte County will be enhanced by requesting that the PSC recognize Charlotte County's support for the construction of a central sewer system and provision of central wastewater service to the Barrier Islands."

There has been no documentation that the health, safety and welfare of Charlotte County will be enhanced by the construction of a central sewer system and provision of central wastewater service

to the Barrier Islands.

The PSC rejected a similar County letter submitted with the 2022 application that stated the EU proposal was consistent with the Comprehensive Plan. Since the PSC 2022 decision, there have been no changes to the County's Comprehensive Plan that would make the EU application consistent with the Comprehensive Plan.

If the County had strongly supported the installation of a central wastewater system for the Bridgeless Barrier Islands to replace septic tanks, it would have taken steps to amend the Comprehensive Plan to address all inconsistencies.

The current EU proposal remains inconsistent with the Comprehensive Plan. As the PSC found in 2022, EU's replacing the septic tanks on the Bridgeless Barrier Islands with a central sewer system is inconsistent with the County's Comprehensive Plan. The following sections of this report provide that conclusive evidence.

As was the 2022 proposal, the current EU proposal conflicts with the County's Comprehensive Plan by proposing sewer service outside the designated Urban Service Area and the exception to allow service outside the Urban Service Area is not applicable to the EU proposal. Future Land Use Element (FLU) Policy 1.2.3 establishes the County's primary growth management tool: the Urban Service Area, which is depicted on Future Land Use Map (FLUM) Series Map #3 and copied to Exhibits 2A & B of this report. The Urban Service Area is the geographical limits where public facilities and services, such as a centralized sewage disposal system, are provided and is used to guide "predictable, fair and cost effective" public development decisions.

FLU Policies 1.2.4 and 3.2.4 prohibit sewer service outside the Urban Service Area; the EU proposal service area is outside the Urban Service Area. Per FLU Policy 1.2.4, the use of the Urban Service Area, among other benefits, establishes the priority locations for extension of the public facilities and services and FLU Policy 3.2.4 prohibits the provision of sewer infrastructure outside the Urban Service Area. The exception to the prohibition of extending sewer outside the Urban Service Area is only in cases where there is clear and convincing evidence that a health problem exists. The EU proposal does not qualify for the exception as no evidence that a health problem exists has been provided.

Any assertion that Potable Water and Sanitary Sewer (WSW) Policy 2.1.4 of the Comprehensive Plan would provide an exception for EU's provision of sewer service outside the Urban Service Area since it would be regulated by the PSC is categorically false. That policy exception is overridden by the County's explicit prohibition of sewer extension into the Barrier Island Overlay District (BIOD) as stated in Future Land Use Element Appendix I: "The County shall not expand the scope of potable water or sanitary sewer service to the Bridgeless Barrier Islands" (which is

the location of the EU proposed service area). FLUM Series Map #9, as copied to Exhibit 3 of this report, shows the BIOD consists of Charlotte County's barrier islands including the Bridgeless Barrier Island chain; i.e., where EU proposes service. Coastal Policy 3.2.7 makes the prohibition of expanding the scope of sanitary sewer service onto the Bridgeless Barrier Islands an adopted policy: "Infrastructure and services to the Bridgeless Barrier Islands, depicted in FLUM Series Map #9, are addressed in the Barrier Island Overlay in the FLU Appendix I." EU's application is clearly inconsistent with this policy since the proposed utility service area is within the BIOD.

As stated in FLU Policy 3.2.4, the County will continue to primarily rely upon individual on-site septic systems as the method of wastewater disposal in areas outside the Urban Service Area.

The Comprehensive Plan includes policies to ensure continued effective functioning of the septic tanks. For example, WSW Policies 5.1.1 and 5.1.2 of the Infrastructure Element direct the County to assist the Charlotte County Health Department (CCHD) Environmental Health Unit (EHU) in developing a schedule of septic system inspection and maintenance in order to safeguard the public health, safety, and welfare. WSW Policy 5.1.3 requires that all on-site septic systems, whether new or replacement, meet or exceed the treatment standard for on-site disposal systems within Chapter 64E-6, Florida Administrative Code, or local ordinance, whichever standard is higher. WSW Policy 5.2.1 provides for County assistance to the CCHD in collecting water and soil samples from various locations within the County to be analyzed for pollutant loadings, and WSW Policy 5.2.3 requires septic tanks to be repaired or replaced when analysis indicates the system is adversely impacting the environment according to State water quality standards (Chapter 62-302, F.A.C., for surface water, Chapter 62-520, F.A.C., for ground water, and Chapter 64E-9, F.A.C., for bathing places) or when public health is endangered.

Charlotte County Code of Ordinances Section 3-8-256 also provides for effective septic tank functioning by requiring all non-Aerobic Treatment Unit (ATU) on-site sewage systems located within three hundred (300) feet, as measured from the closest point of the drainfield to a canal or other surface waters, to be inspected by a representative of the Charlotte County Health Department at least once every five (5) years, and pumped empty at least once every five (5) years by a licensed septic tank contractor or plumber equipped and certified to pump on-site sewage systems. ATUs must be inspected by an approved maintenance entity at least every six (6) months.

The EU proposal will require public expenditures for a project within a Coastal High Hazard Area (where the service area is located) directly contradicting CIE Policy 1.5.1, which states that the County will "deny the use of public funding for capital improvements in Coastal High Hazard Areas." Whereas EU proposes private monies for the system, there would still be County expenditures associated with the proposal including, but not necessarily limited to, the ongoing operation and maintenance costs of the transmission line from the connection point to the County's water reclamation facility, maintenance of the flow meter at the connection point to the EU collection system, and funding capital improvements required to address any new regulations.

EU has not provided documentation to qualify for any of the policy's exceptions; i.e., to replace deficient or worn-out facilities; provide open space or recreational facilities; address a public health, safety, or welfare issue; or the project can only be located in such area due to its intrinsic nature.

EU has not provided a realistic customer projection thus, providing no proof that EU has the financial capability of meeting the required level of service of 190 gallons of sanitary sewage per day per ERC as is required by WSW Policy 1.1.3. The application assumes mandatory connection to sewer, which is incorrect. All residential units in EU's proposed service area will not be required to connect to the proposed utility. Whereas County Code Section 3-8-41 states all developed property must connect the plumbing system for any structure on the property to an available public or private sewer system within three hundred sixty-five (365) days after written notification by the public or private sewer system that the system is available for connection, such mandatory connection is only required for properties within the Urban Service Area or for new development per WSW Policies 3.1.2 and 3.1.3.

WSW Policy 3.1.2: Connection of Developed Property In the Urban Service Area, whenever centralized potable water or sanitary sewer service is made available to any developed property, the constructing utility shall require the landowner to connect to the utility upon written notification by the utility provider that service is available for the property. "Available" means that the utility has adequate permitted capacity to serve the development and that a utility line is within the distance from the property as specified by County ordinance or State Statute.

WSW Policy 3.1.3: Connection of Property under Development The County shall require that whenever central potable water or sanitary sewer service is made available, as established in WSW Policy 3.1.2, to any property with a new structure under construction, the landowner shall connect the structure to the utility system prior to receiving a certificate of occupancy or its functional equivalent.

Per FLU Policy 1.1.6, which states "all County regulations are subordinate to the Plan..." the above policies would take precedence over the regulation.

New development connections also should not be relied upon for level of service compliance or financial forecasting given the County's policy to limit density on the Bridgeless Barrier Islands to one dwelling unit per gross acre (Coastal Policy 3.2.3) as well as incentivizing transfer of development rights out of the CHHA (FLU Policy 1.2.7).

A realistic customer projection is necessary to prove EU has the financial capability of meeting the required level of service. A reduction of customers will result in a lower revenue stream for EU, which could make it difficult to meet the mandated level of service. Per WSW Policy 1.1.1, the level of service applies to all utilities serving the unincorporated areas of Charlotte County, public or private.

EU's failure to provide a plan to avoid irreparable damage to rare and imperiled natural communities is inconsistent with the Comprehensive Plan's Natural Resource Element. This conflict is particularly evident in the proposed system's pipe layout through Don Pedro State Park, which has an extensive amount of rare and imperiled communities as identified on Supporting Policy and Analysis Map Series Map #50, as is copied to Exhibits 4A and B of this report. Natural Resource Element (ENV) Policy 2.3.3 requires avoiding the destruction of the rare and imperiled natural communities. The extensive length of excavation that will be needed in the park for these lines, which are the largest diameter pipes of system (see Exhibit 5 of this report), would cause significant damage to the park's environmentally unique and irreplaceable lands, both initially and long term.

The installation of the pipes will likely require more than simple trenching due to the unsuitable soil conditions throughout the park. The soil is rated "Very Limited" by the United States Department of Agriculture, explicitly indicating that the soil has severe limitations that cannot be easily overcome. Furthermore, several locations where lines are proposed are "Estuarine and Marine Wetlands" according to the National Wetland Inventory. Clearing and trenching the park's fragile native ecosystems and habitat will have irreversible damage.

The potential for severe adverse effects to one of Florida's most unique ecosystems would be ongoing due to the critical need for pipeline maintenance. Continual clearing will be needed to prevent leaks or even structural collapse resulting from tree roots and other vegetation infiltrating the pipes. Even the 2019 Preliminary Engineering Report, prepared by Giffels-Webster Engineers, Inc. for EU, acknowledges the potential for leaks and spills associated with the proposed project.

Laying the pipes in the park would also be in direct conflict with ENV Policy 2.2.6, which states, "the County shall protect environmental lands using all available methods," which could include prohibiting the pipelines in Don Pedro State Park.

ENV Policy 2.2.6 could also preclude the proposed pipeline in the Lemon Bay Aquatic Preserve; i.e., the water between the islands and the mainland. Lemon Bay Aquatic Preserve's unique, submerged ecosystem of mangrove, seagrass and oyster communities could be severely harmed by sewer pipes running through it. A pipeline leak could release a substantial concentration of harmful pollutants, such as bacteria, viruses, and chemicals, into the bay, jeopardizing marine life and rendering the area unsuitable for recreational activities.

The EU application lacks the specific engineering assessment and scientifically grounded analysis of potential environmental impacts, as well as the process for mitigating the impacts, as is required by Comprehensive Plan ENV Policy 2.2.3. Until this report is submitted and approved by the County, the proposed pipe layout is inconsistent with the Comprehensive Plan.

EU's failure to provide sufficient information to assess the potential detrimental impacts of the proposed sewer system construction on natural and cultural resources also does not align with FDEP Park Management Plan and a Community Plan. FDEP has a specific plan related to Don Pedro Island, as mandated plan under Florida Statutes Chapter 259.032(9)(a), that the EU proposal is inconsistent with. The Don Pedro Island State Park Unit Management Plan establishes Don Pedro Island State Park for "single-use": the sole purpose is to provide for protection of natural Florida and its cultural resources on the public's behalf. As part of development of the plan, the potential to accommodate secondary purposes was analyzed; the conclusion was that "no secondary purposes could be accommodated in a manner that would not interfere with the primary purpose of resource-based outdoor recreation and conservation."

Moreover, the park management plan specifically identifies the areas proposed to be used for EU pipelines as "Protected Zones." These areas include the beach dune, restored coastal berm, maritime hammock, coastal grassland, salt marsh, and mangrove swamp communities as are delineated on the Conceptual Land Use Plan in Exhibit 6 of this report. A protected zone is an area of high sensitivity or outstanding character from which most types of development are excluded as a protective measure. Any use that will involve extensive land alteration, which would include trenching for pipe installation, is not permitted in protected zones.

The park management plan not only includes the land portion of the State park, but also the mangroves and adjacent waters of Lemon Bay, which EU proposes to traverse with utility lines. These submerged areas provide additional protection to park resources and serve as one of the most cost-effective ways to manage disaster risk along coastlines. They help to protect coastal areas from storm surge, erosion, and flooding; and remove pollutants. They also provide protection to nursery areas for fish, crustaceans and shellfish. Their branches and roots serve as nesting areas for coastal birds and provide food and shelter for migratory birds.

The management plan also establishes a goal, which is consistent with the County Comprehensive Plan FLU Policies 1.3.2 and 6.2.12, that all significant archaeological sites within the park are preserved in good condition in perpetuity and protected from physical threats. As noted by the FDEP, Florida's coastal areas, including along and within the Don Pedro State Park and the Lemon Bay Aquatic Preserve, often have a rich history of human settlement dating back to the Archaic period, 10,500 to 3,000 years ago.

As shown in Exhibits 7A and B of this report, which are exhibits from the County Comprehensive Plan Future Land Use Element, significant historic resources have been identified on the Bridgeless Barrier Islands. While many historic sites have already been discovered, much of the area along Lemon Bay Aquatic Preserve and Don Pedro State Park has not been surveyed. This suggests that there are likely many unrecorded sites located along this coastline and in Don Pedro

State Park, which is echoed on other exhibits in the Comprehensive Plan, as are copied to Exhibits 8A and B of this report. The EU proposal threatens these areas contrary to the park management plan's goal of preserving significant archaeological sites.

The need for preservation of Don Pedro State Park is also documented in the Thornton Key Palm Island Knight Island Don Pedro Island Community Plan. As succinctly stated in that plan, “the existing green spaces on the islands must be preserved as much as possible. The loss of this resource will adversely affect not only the quality of life of current residents and visitors but also that of generations to come. Any loss of habitat will also have a profound impact on the wildlife that already exists in a precarious state due to development.”

EU has failed to provide critical information to assess the potential detrimental impacts of the proposed sewer system construction on natural and cultural resources not only in the park but also island-wide.

In addition to no documentation to the right to use FDEP controlled land for the proposed EU system, the EU application does not indicate they have the right to use private property for pipeline. Acquisition of easements on private property will be necessary for the EU pipeline system due to lack of public rights-of-way on the islands. As stated in the Comprehensive Plan Property Rights Element, property owners have the right to physically possess and control his or her interests in the property, have the right to use and maintain his or her property for personal use, and to exclude others from the property to protect the owner’s possessions and property. Given the significant opposition from the island property owners to the EU proposal, EU’s acquisition of the needed easements could prove impossible.

In conclusion, EU's 2024 application for a proposed wastewater system on the Bridgeless Barrier Islands of Charlotte County, Florida is fundamentally flawed and undeniably inconsistent with the Charlotte County Comprehensive Plan and Sewer Master Plan, as well as violates several other plans. The application lacks a clear demonstration of need and therefore should be denied.

If you have any questions, please call without hesitation.

Sincerely,



Ellen S. Hardgrove, AICP
President

Exhibit 1

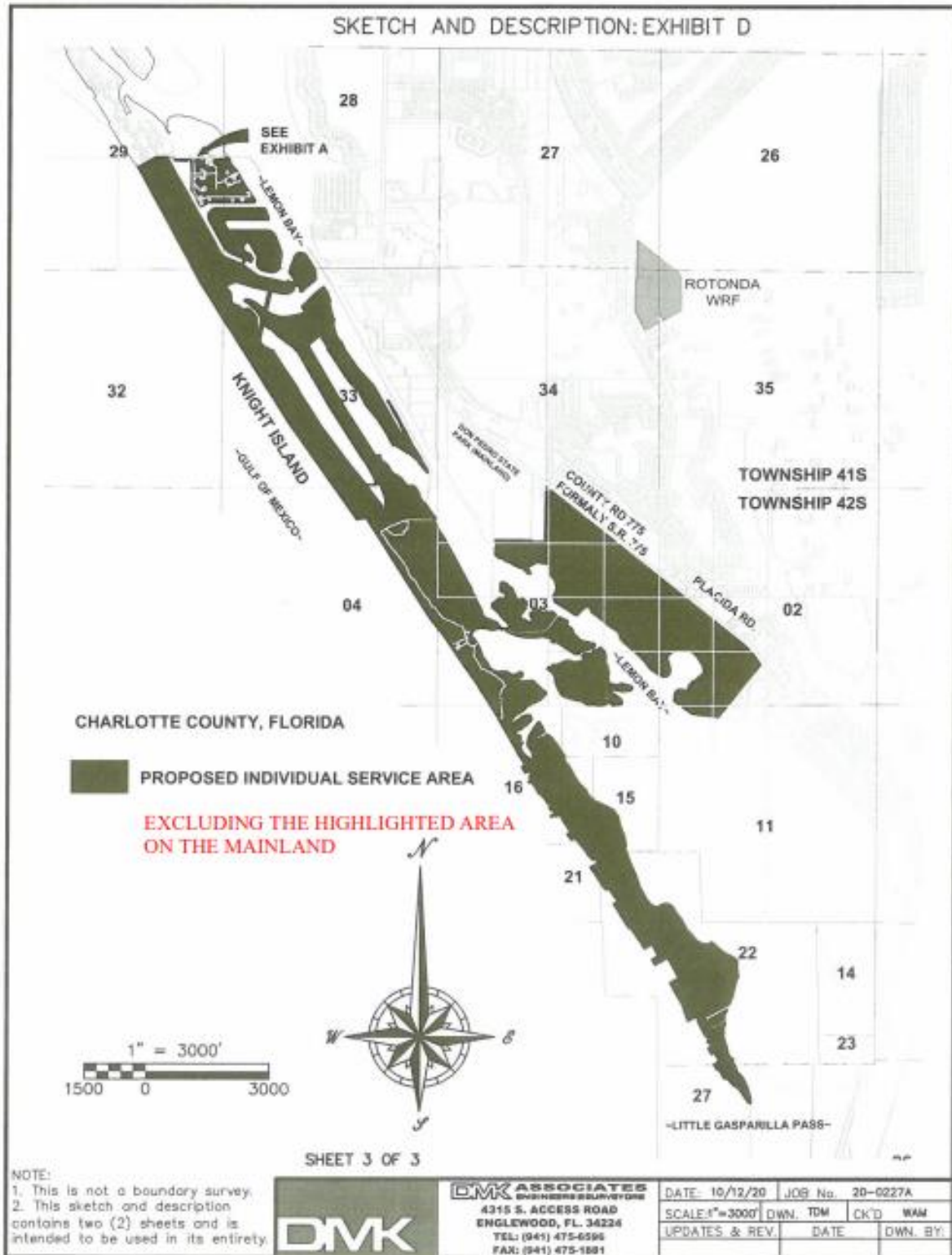


Exhibit 2A

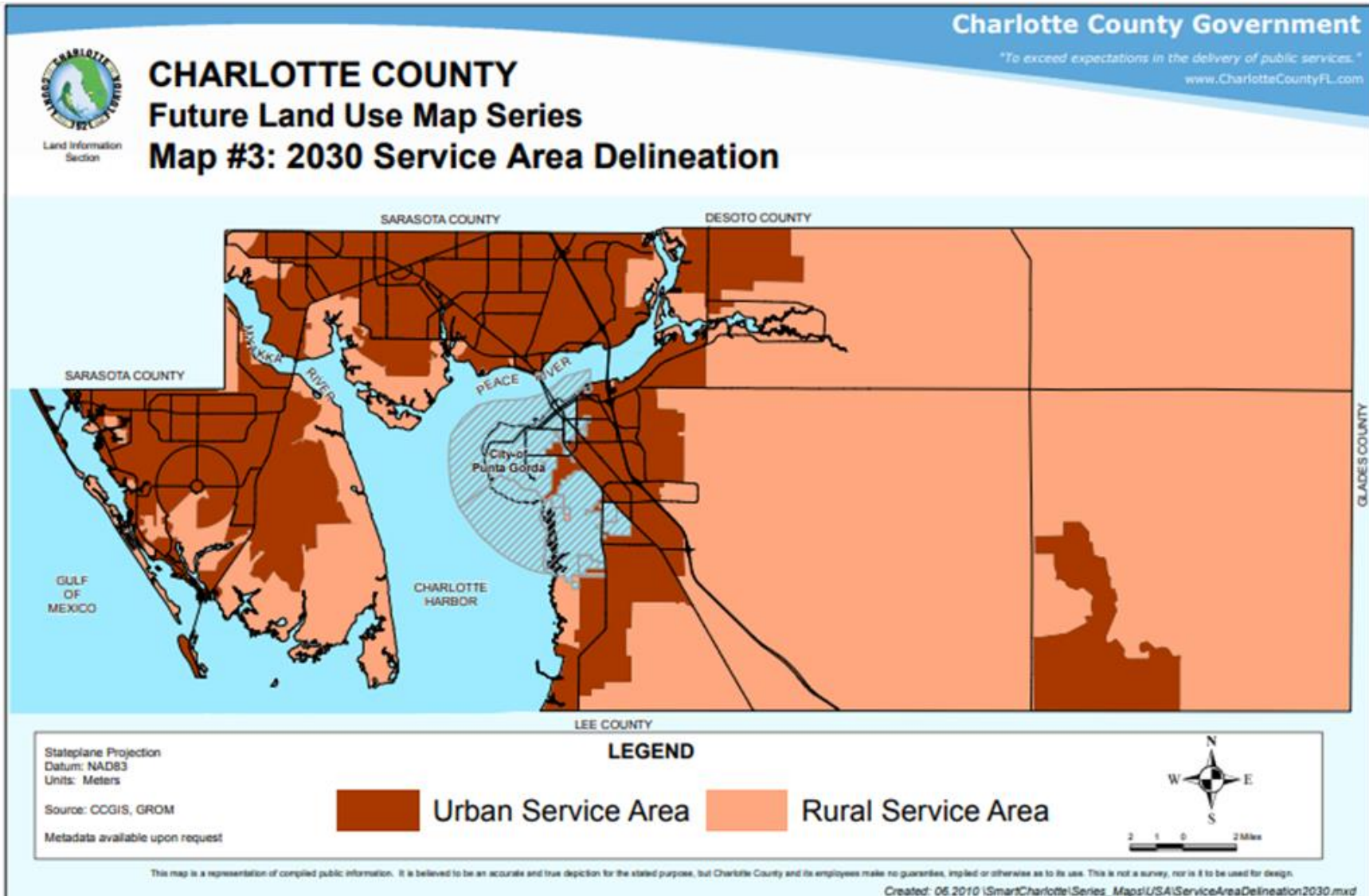


Exhibit 2B– Exhibit 2A Enlarged

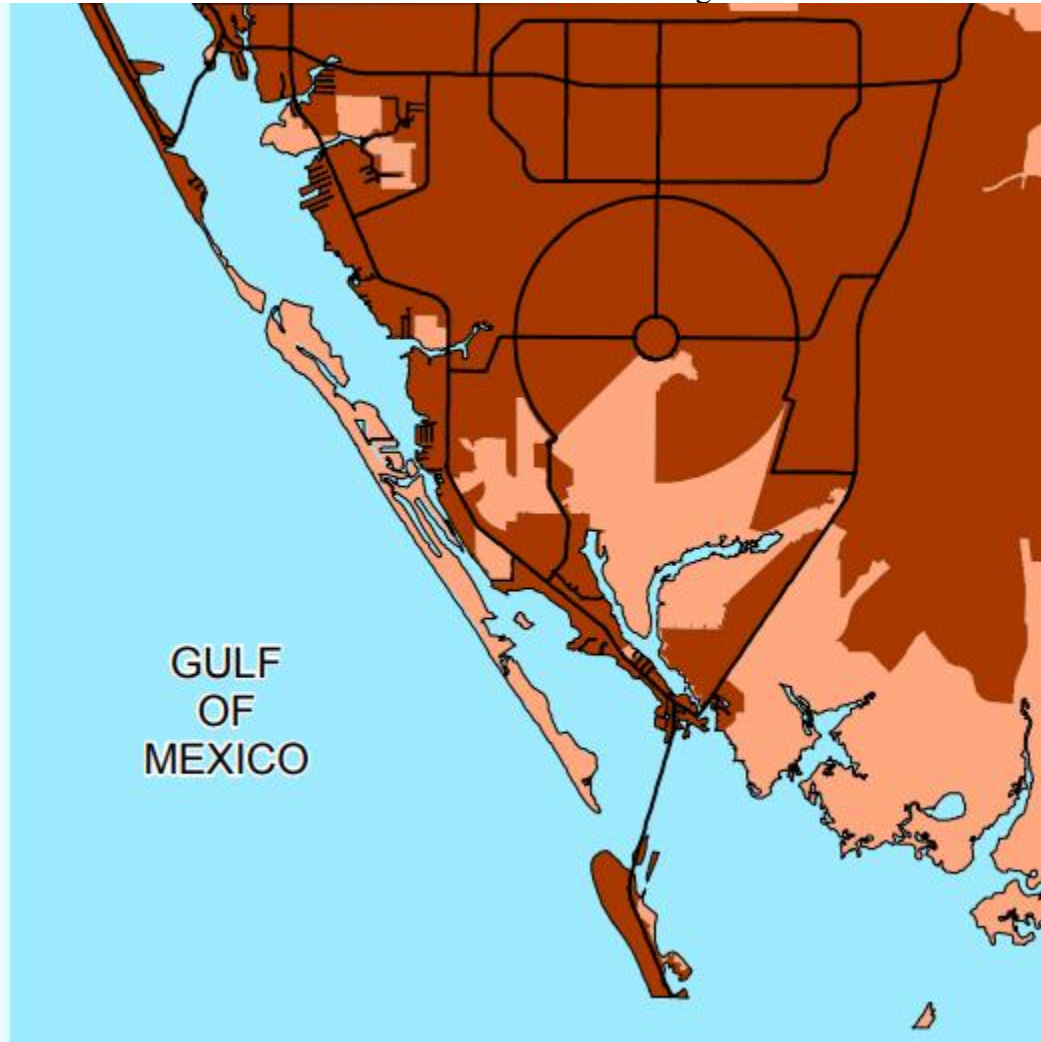


Exhibit 3*



*The islands in the image are incorrectly labeled. The island currently labeled as "Palm Island" should be identified as "Thornton Key" and "Knight Island" (top outer part). The island labeled as "Knight Island" should be labeled "Don Pedro Island", and the island labeled as "Don Pedro Island" should be labeled as "Don Pedro State Park."

Exhibit 4A

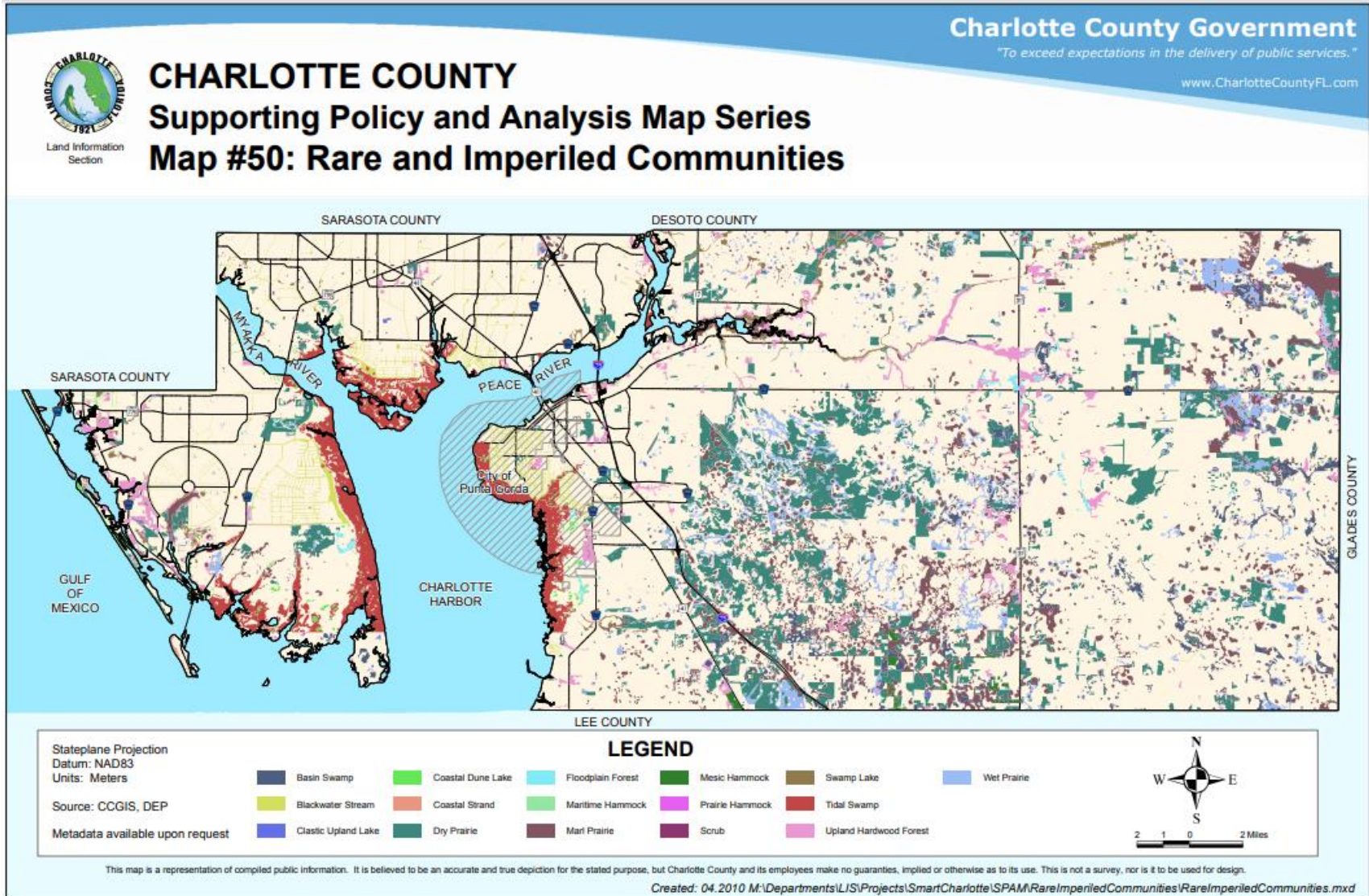


Exhibit 4B – Exhibit 4A Enlarged

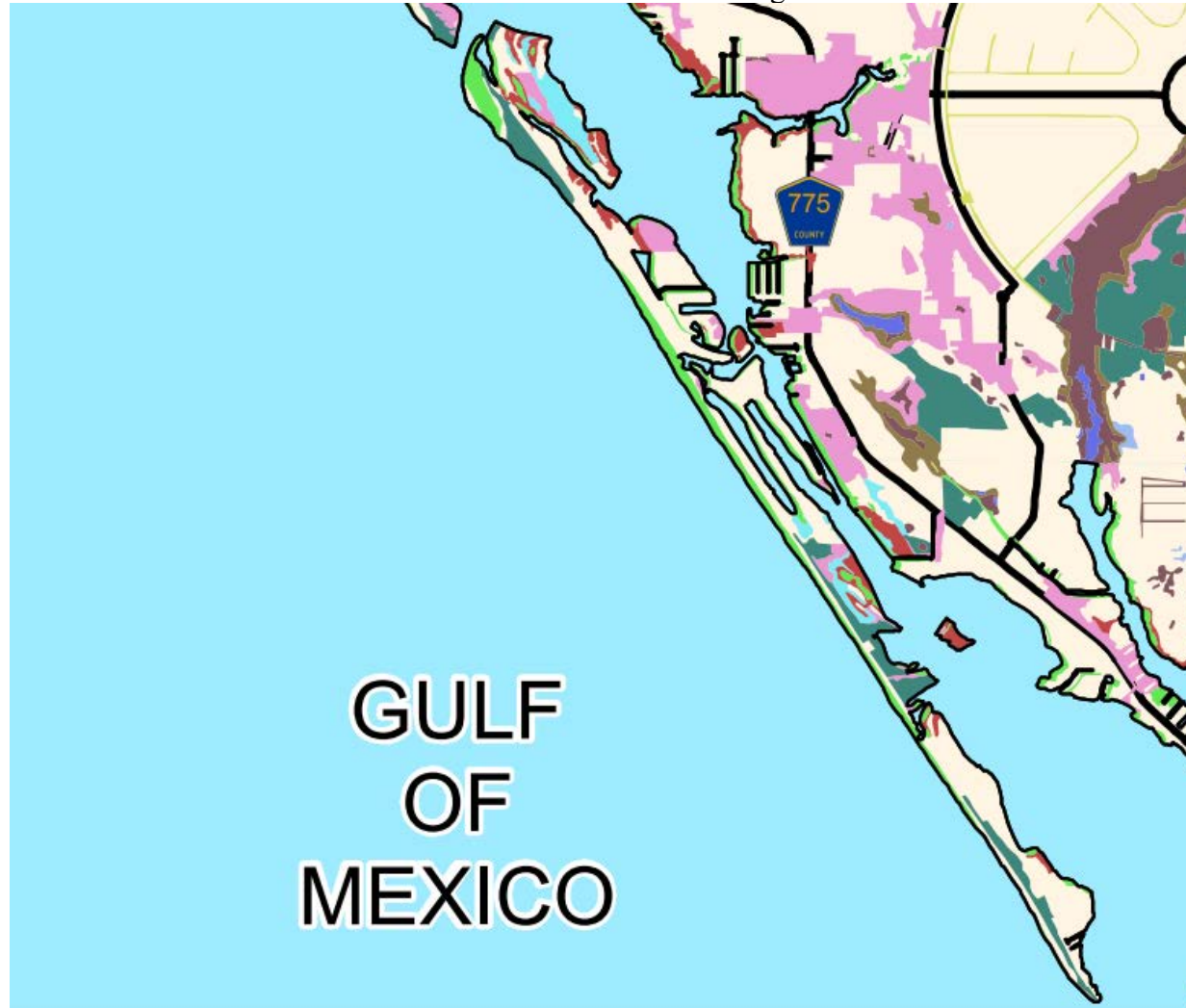
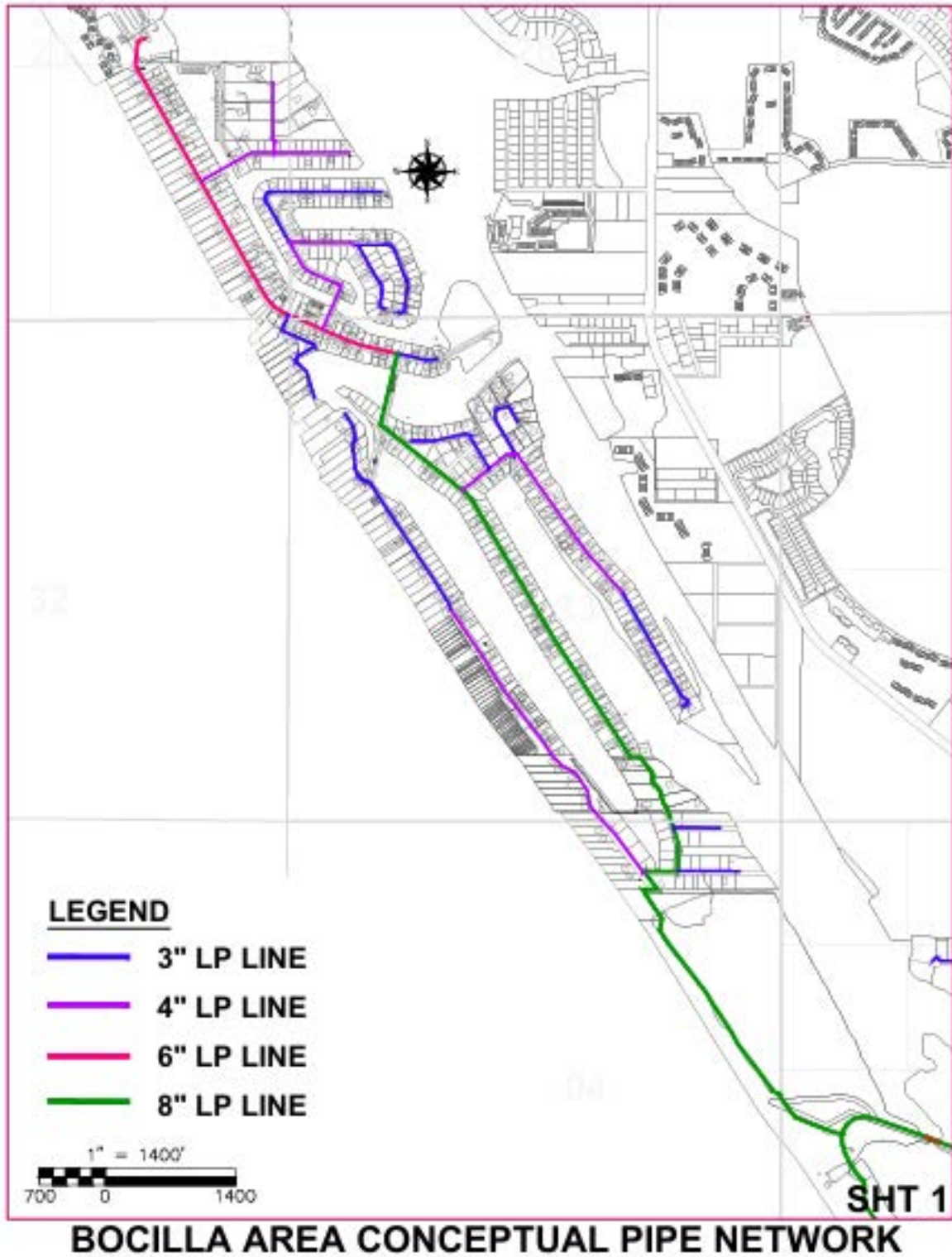
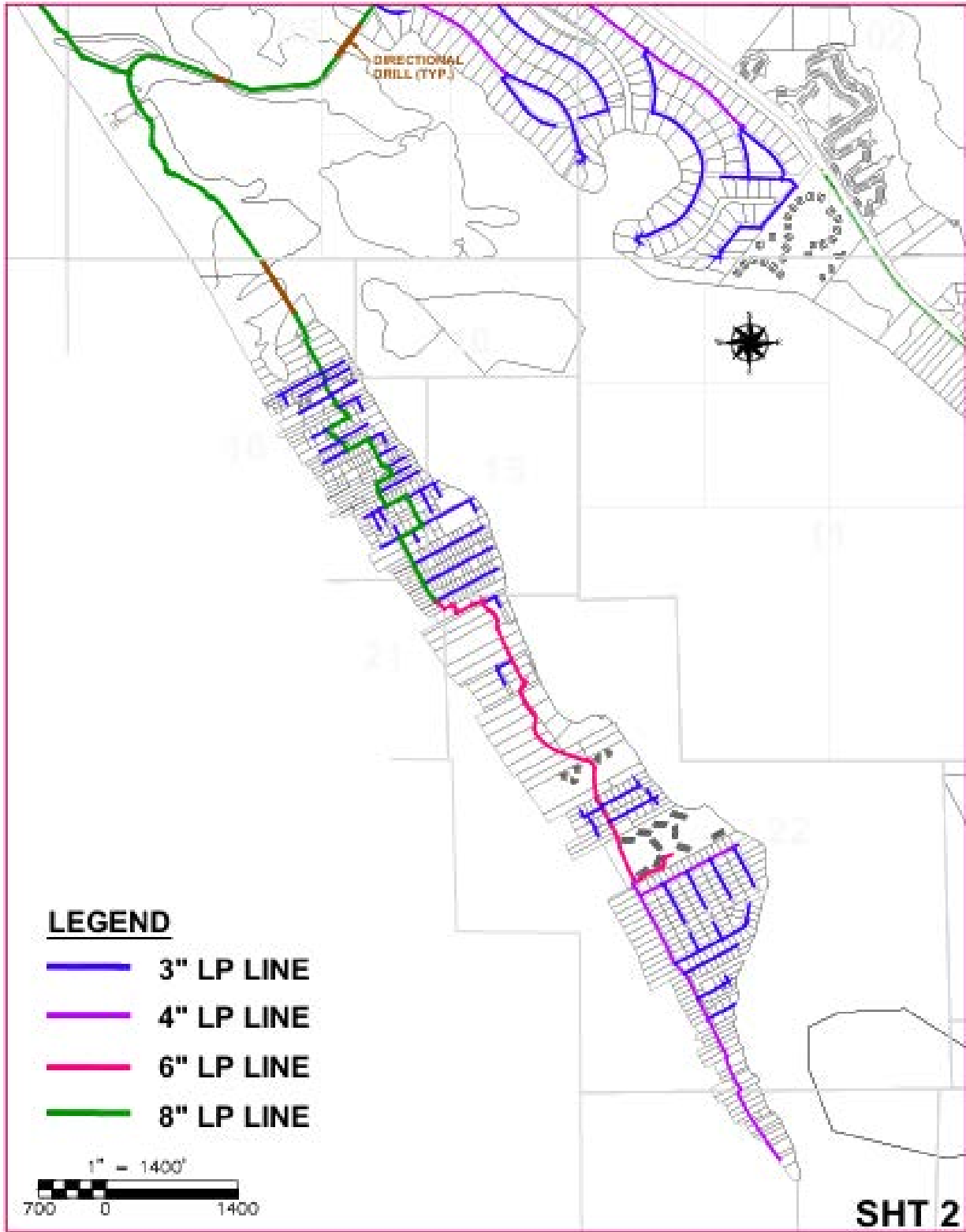


Exhibit 5 (two pages)





LGWU AREA CONCEPTUAL PIPE NETWORK

Exhibit 6 – Don Pedro Park Conceptual Land Use Plan



Exhibit 7A

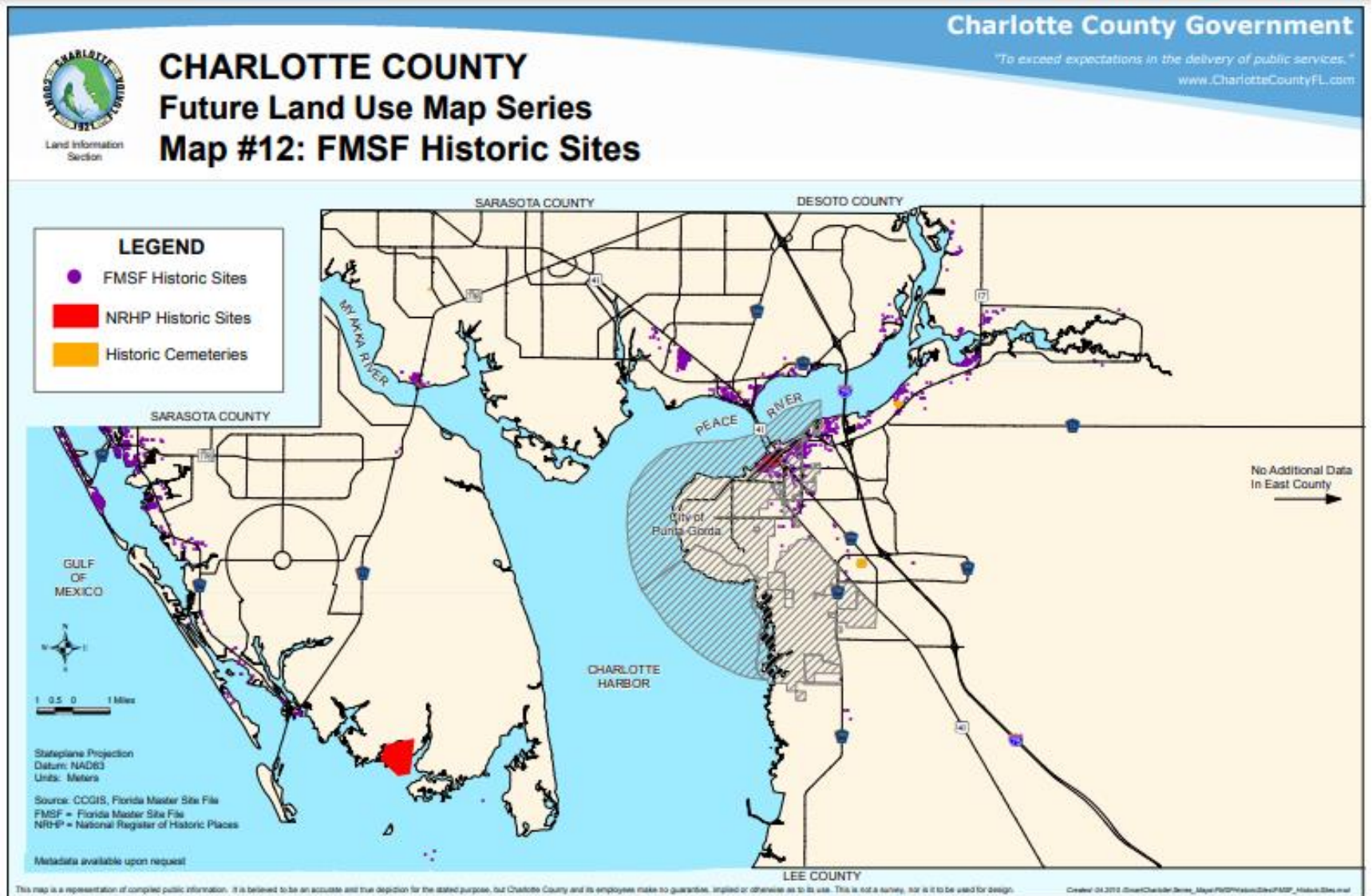


Exhibit 7B – Exhibit 7A Enlarged

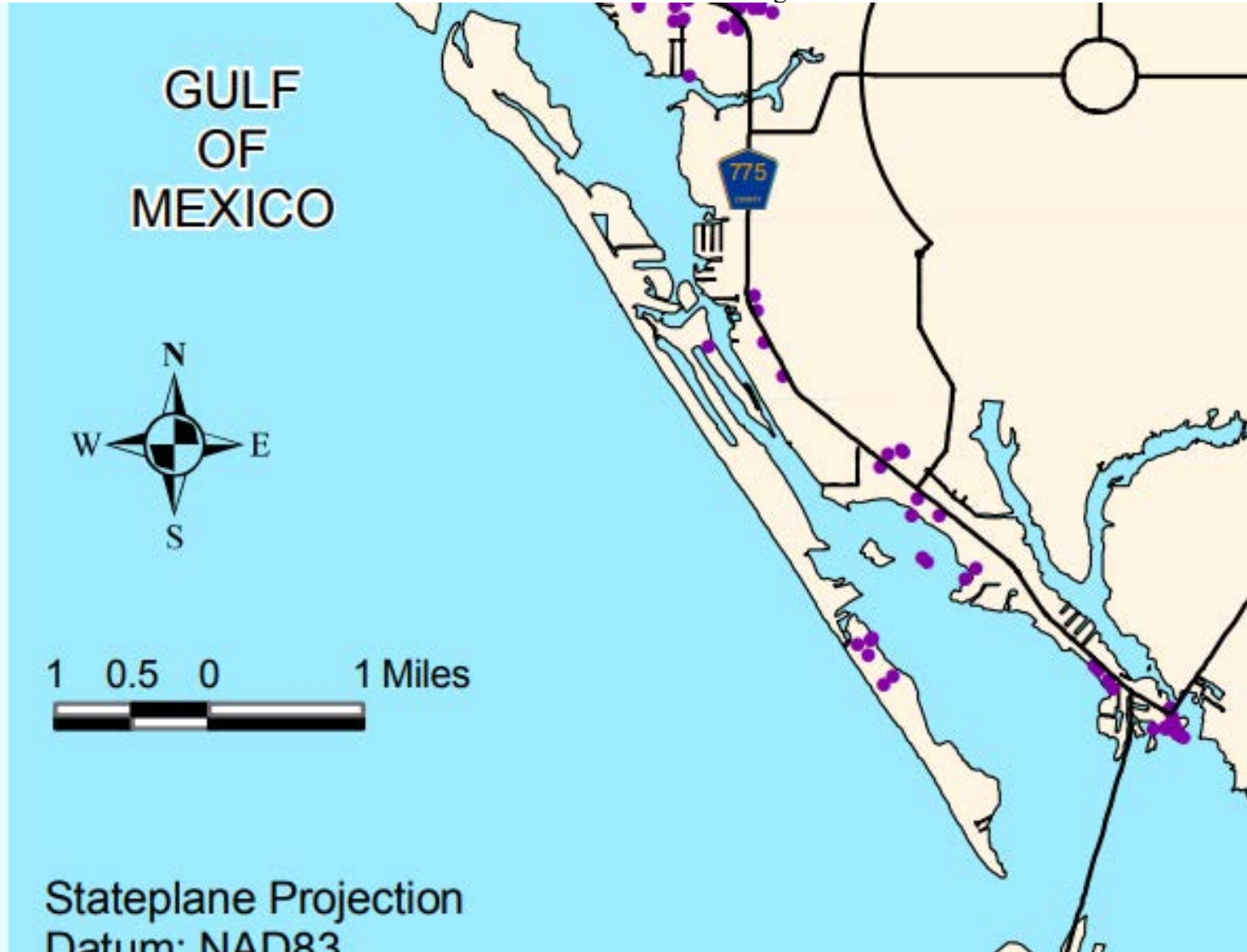


Exhibit 8A

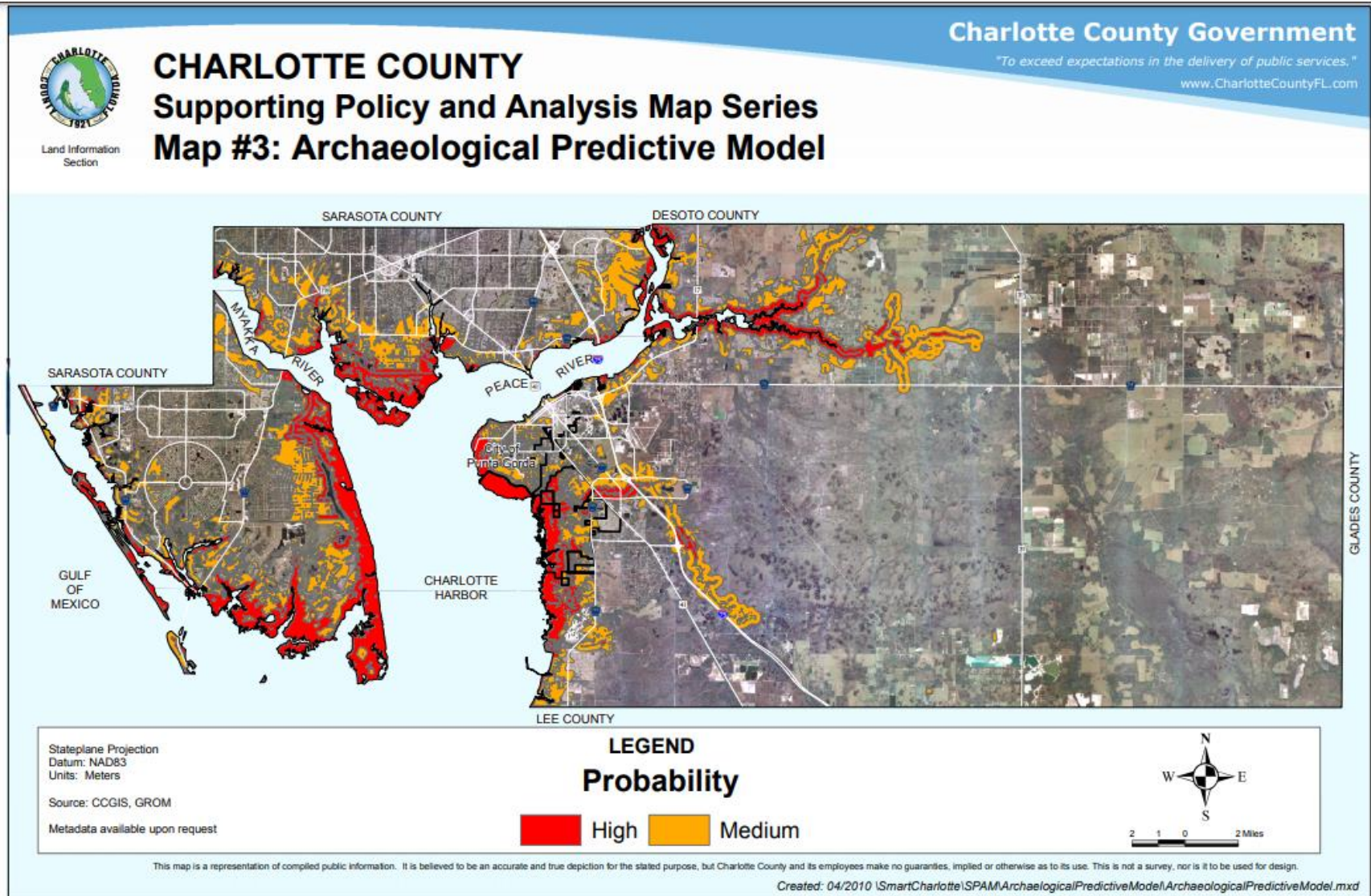


Exhibit 8B– Exhibit 8A Enlarged

