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Subject: GRU Comments to Pilot Plan: Off-Property Soil Replacement
Date: Wednesday, November 13, 2013 10:11:10 AM

GRU has the following comments that have not been stated by other parties:

- The selection of plants for installation in this pilot is outstanding. Kudos to the Beazer team and the homeowner.
- Beazer might consider moving the proposed location for staging of green waste to a higher elevation. The proposed location may be prone to flooding because it is toward the low side of a stormwater retention pond.
- Section 2.2.5 of the plan describes the clean soil stockpile. The plan is to store the soil on an impervious surface but there is no mention of capturing stormwater or controlling erosion/sedimentation off the stockpile. Please address this.

When it comes to full-scale removal of soil from offsite properties, Beazer should coordinate erosion and sedimentation control requirements with FDEP. My understanding is that clearing of more than one acre of land requires a permit. Permit conditions include, among other things, site inspection after any 0.5 inch rainfall event, and the most common violation of permit conditions is lack of adequate record keeping.

John Herbert