



St. Johns River Water Management District

Kirby B. Green III, Executive Director • David W. Fisk, Assistant Executive Director
David Dewey, Altamonte Springs Service Center Director

975 Keller Road • Altamonte Springs, FL 32714-1618 • (407) 659-4800
On the Internet at www.sjrwmd.com.

January 4, 2008

Mr. James A. Stivender, P.E., PLS
Public Works Director
Lake County Department of Public Works
437 Ardice Avenue
Eustis, FL 32726

Re: Hartwood Marsh Road – Phase I; Application Number 40-069-114354-1
(Please reference the above name and number on all correspondences)

Dear Mr. Stivender:

The St. Johns River Water Management District is in receipt of your Standard Environmental Resource Permit (ERP). Upon preliminary review of the proposed project, the following technical information is required to sufficiently review the possible impacts the project may have on the surrounding area. This information is being requested pursuant to the authority vested in the St. Johns River Water Management District under subsection 373.413(2), Florida Statutes, and sections 40C-4.101 and 40C-4.301, Florida Administrative Code (F.A.C.).

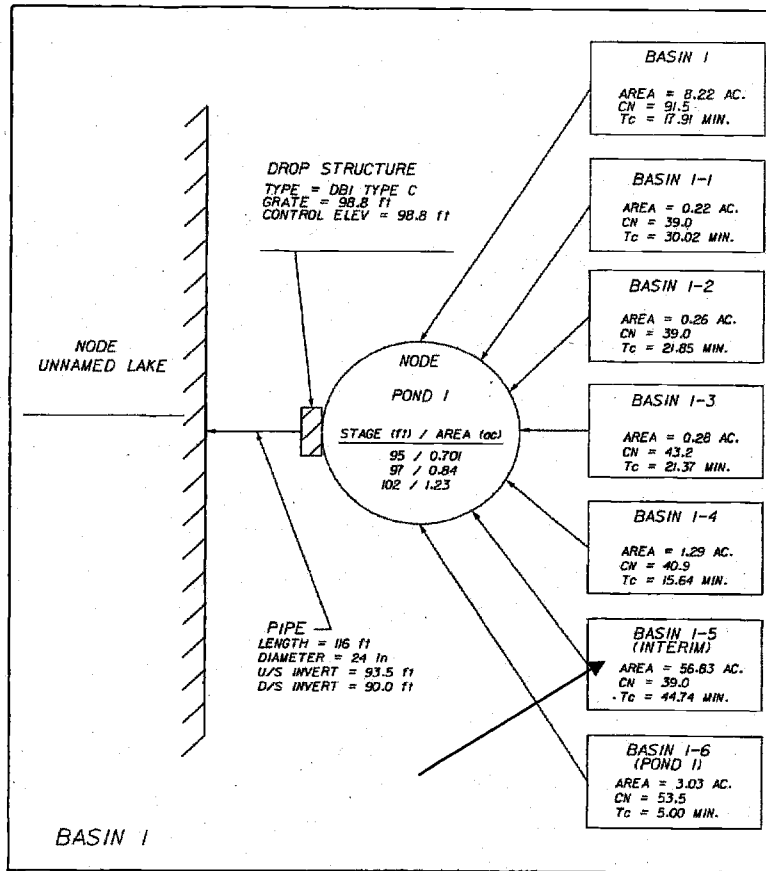
In order to expedite the review of your application, please use the application number referenced above on all correspondence, and submit **three (3) copies** of all requested information unless otherwise indicated by a specific information request.

1. Please provide revised pre, “interim”, and post-development drainage basin maps that include sufficient on and off-site area topographical elevations. Clearly delineate the specific flow paths used in determining the time-of-concentrations for each basin. This information is necessary to validate the water quality and quantity calculations submitted with your application. [40C-4.301(1)(a)(b)(c)(e)(i); 40C-42.026(1), F.A.C.; 10.3, 11.2 A.H]
2. Please amend *PLAN SHEETS 18* through *28* of the set of construction plans submitted to depict the existing grade elevations. This information is necessary to verify the stormwater drainage patterns. [40C-4.301(1)(a)(b)(c)(e)(i), F.A.C.]
3. Section 7.1 of the Drainage Calculations submitted states, in part, “*In the post development condition, the basin area contributing to Pond 1 consists of the roadway (Sta. 103+43 to Sta. 138+50) and offsite basins directly adjacent to the road. Pond 1 is considered a separate basin. The runoff from the area surrounding the pond will be bypassed around the pond. Pond 1 will discharge to the unnamed lake.*”

GOVERNING BOARD

David G. Graham, CHAIRMAN JACKSONVILLE	Ann T. Moore, SECRETARY BUNNELL	Duane L. Ottenstroer, TREASURER JACKSONVILLE	Susan N. Hughes PONTE VEDRA
Michael Ertel OVIEDO	Hersey “Herky” Huffman ENTERPRISE	Arlen N. Jumper FORT McCOY	William W. Kerr MELBOURNE BEACH
			W. Leonard Wood FERNANDINA BEACH

Please note that this appears to be inconsistent with the post development *Pond 1 Nodal Diagram* submitted, which indicates that runoff from *BASIN 1-5 (INTERIM)* will be routed into *Pond 1*, in addition to the offsite basins directly adjacent to the road. Reference the following excerpts from the Drainage Calculations submittal.



PROPOSED CONDITIONS:

LOCATION	STATION	To	STATION	BASIN WIDTH (ft)	IMP AREA (Acres)	PERV AREA (Acres)	TOTAL AREA (Acres)	REMARKS
ON-SITE:								
BASIN 1	103+43	-	138+50	100 to 110	7.12	1.09	8.22	
BASIN 1-6 POND AREA	-	-	-	-	0.00	3.03	3.03	Includes Pond Access Area
ON-SITE SUBTOTAL:					7.12	4.12	11.25	
OFF-SITE:								
BASIN 1-1 (OFF-SITE)	103+80	-	107+40	-	0.00	0.22	0.22	Runoff Conveyed to Pond
BASIN 1-2 (OFF-SITE)	107+90	-	111+40	-	0.00	0.26	0.26	Runoff Conveyed to Pond
BASIN 1-3 (OFF-SITE)	111+40	-	115+30	-	0.02	0.26	0.28	Runoff Conveyed to Pond
BASIN 1-4 (OFF-SITE)	116+00	-	138+50	-	0.04	1.20	1.24	Runoff Conveyed to Pond
BASIN 1-5 (OFF-SITE)					0.00	56.83	56.83	Diverted around pond, include interim runoff from what will be the future First Baptist Church.
OFF-SITE SUBTOTAL:					0.06	58.77	58.83	
TOTAL:					7.18	62.89	70.08	

- a. Accordingly, please revise the set of construction plans to clearly show the boundary limits of all areas draining to the proposed *Pond 1* system.
 - Ensure that these areas have been accounted for in the water quality and quantity calculations.
 - Be advised that stormwater treatment systems must be designed to provide the required treatment and attenuation from the entire contributing basin area (including the pond).
- b. For the proposed diversion of any off-site basin runoff flow around *Pond 1*, revise the set of plans to include a more detailed grading plan for the construction activity in its entirety.
 - Show how the proposed contour lines will tie into the existing contours along the outer perimeter of the proposed diversion area.
 - Include cross-section details, as needed, to clarify the proposed grades.
 - Show the extent of any fill to be placed, if applicable.

Submit any revised plans and calculations. [40C-4.301(1)(a)(b)(c)(d)(e)(i); 40C-42.026(1), F.A.C.]

4. Staff is unable to determine, from the information provided on the set of construction plans received by the District on December 6, 2007, as to whether or not the proposed *Pond 2* surface water management system will function as an off-line system, as indicated in the water quality calculations.

Please note that, all surface water management systems currently classified as off-line treatment must incorporate a diversion device within the design. The diversion device creates storage of a specified portion (i.e., first flush) of the stormwater in such a manner so that subsequent (i.e., second flush) runoff in excess of the specified volume of stormwater does not flow into the area storing the initial stormwater. In other words, the off-line system must direct the remaining flow (after the water quality volume is reached) to a separate system. The off-line system cannot be utilized to treat subsequent flushes of stormwater runoff in tandem with the storage of the first flush runoff.

- a. Please demonstrate that the proposed off-line system is designed in accordance with the above information.
- b. Or, as an option, redesign the system to meet on-line treatment volume requirements.

Additionally note that proposed off-line systems that also serve to provide significant detention storage above the off-line treatment volume storage will be considered to function as on-line systems. [40C-4.301(1)(e)(i); 40C-42.026(1), F.A.C.]

5. Section 7.2 of the Drainage Calculations submitted states, in part, *"In the post development condition, the basin area contributing to Pond 2 consists of the roadway (Sta. 138+50 to Sta. 152+39) and offsite basins directly adjacent to the road. Pond 2 is considered a separate basin. Pond 2 is located on the future First Baptist Church of Clermont property. The County has had discussions with the property owner to coordinate joint use opportunities. The County has designed this pond to accommodate the runoff from the First Baptist church site assuming that the future development will be no more than 80% impervious. In addition, Pond 2 has been designed to include runoff from a section of the future South Hancock Road extension."*

Accordingly, please provide a draft copy of the joint use agreement between Lake County and the First Baptist Church of Clermont. Clearly identify, in the agreement, which components of the *Pond 2* system each entity will maintain. [40C-4.301(1)(i); 40C-42.027(1)(2); 40C-42.025(6), F.A.C.]

6. Section 7.3 of the Drainage Calculations submitted states, in part, *"In the post development condition, the Basin 3 area consists of the roadway (Sta. 152+39 to Sta. 161+50) and offsite basins directly adjacent to the road. This runoff from this basin will be treated in the Hartwood Marsh Road Phase II project. In the interim condition, the runoff from this basin will discharge to the roadside swales. Ditch blocks paced 50 feet apart in the swales on both side of the road will retain a portion of the runoff. Because this is an interim condition and the roadway is transitioning to match the existing two lane road, a best management practices approach was taken to address storm water treatment and attenuation. Currently the roadside swales are very shallow or nonexistent. In the interim condition, better defined swales will be provided to retain as much runoff as possible without requiring the purchase of additional right of way that would not be needed in the future when the Phase II retention ponds are constructed."*

Please be advised that there are no rule exemptions regarding the life of your project (i.e., temporary, interim or permanent) as a factor in determining as to whether or not the water quality and quantity requirements must be met.

Accordingly, please submit a revised design and calculations demonstrating that the water quality and quantity requirements for the *Basin 3* area have been met, pursuant to current District criteria. Include all pertinent geotechnical information to support the parameters utilized in the recovery analyses. [40C-4.301(1)(a)(b)(c)(e)(i); 40C-42.026, F.A.C.]

7. Please justify the *Pond 2* base of aquifer and seasonal high water table elevations of 85.00 and 101.90 feet, respectively, as utilized in the PONDSD-Version 3.2.0145 Retention Pond Recovery Analysis. Based on the recommendations presented on Page 6 of the September 6, 2007 revised *Roadway Soil Survey* by Ardamon & Associates, Inc., the *Boring Nos. AB-P3* and *AB-P4* profiles, the maximum depth of the soil borings (i.e.,

20.0 feet), it appears that the average base of aquifer and seasonal high water table elevations may be located at elevations 101.90 and 106.90 feet, respectively.

- a. Accordingly, please clarify. Provide revised calculations demonstrating that 1) the *Pond 2* required treatment volume will be recovered within 72-hours and 2) the *Pond 2* storage capacity will be recovered within 14 days following the design storm event.
- b. Or, as an option, provide additional geotechnical information to support the aquifer base and seasonal high water table elevations utilized in the analyses.

Submit any revised plans and calculations, as appropriate. [40C-4.301(1)(e)(i), F.A.C.]

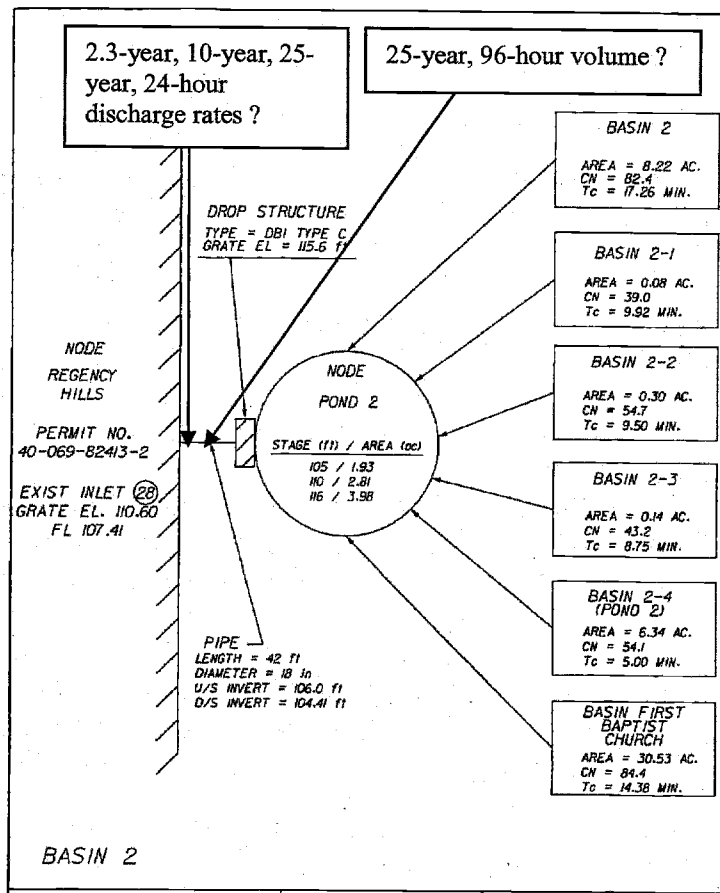
8. The time of concentration T_c parameters utilized in the pre, "interim", and post development design storm event analyses appear to be low, especially for the existing land condition. Accordingly, please clarify and provide additional calculations that reconfirm the time of concentration parameters utilized, as follows:
 - a. Provide revised calculations using the kinematic formula for the first drainage sheet flow length of 300 feet followed by shallow concentrated flow for the remaining flow lengths.
 - b. Ensure consistency with the specific flow paths indicated on the revised pre, "interim", and post-development drainage basin maps.

[40C-4.301(1)(a)(b)(c)(e)(i), F.A.C.]

9. The water quantity calculations appear to have utilized infiltration during routing of the mean annual (2.3-year, 24-hour), the 10-year, 24-hour, the 25-year, 24-hour, and the 25-year, 96-hour (i.e., design) storm events.
 - Please note that, when utilizing infiltration during routing of the storm events, the proposed pond area must contain a curve number that is representative of an impervious surface to the design high water elevation in the post-development calculations.
 - Further note that, the analyses must exclude unsaturated flow.

Accordingly, please clarify and provide revised calculations demonstrating consistency with the above. [40C-41.063(2)(a); 40C-4.301(1)(a)(b)(c)(d)(i), F.A.C.]

10. Based on the incomplete water quantity analyses provided, it cannot be determined as to whether or not the proposed discharge from *Pond 2* will meet or exceed the discharge rates and volumes previously established by District Permit No. 40-069-82413-2 for the Regency Hills system. Reference the following notations provided on the excerpt below.



Accordingly, please clarify. Provide additional calculations demonstrating that the post-development discharge rates and volumes from *Pond 2* will not exceed those previously established for the Regency Hills system. Include all supporting information. [40C-4.301(1)(a)(b)(c)(i), F.A.C.]

11. Please provide revised calculations for each proposed surface water management system demonstrating recovery of the storage capacity within 14 days following the design (i.e., 25-year, 96-hour) storm event.

If back-to-back storm events are elected to satisfy this criteria, please input two repetitions into the POND5 model to simulate back-to-back storm events and the recovery period between each storm event. Please note that the analyses provided with this submittal did not consider this criteria. Provide the Detailed Results output file, as part of your response, in demonstrating that each pond is designed in accordance with this criteria. [40C-4.301(1)(a)(b)(c)(i), F.A.C.]

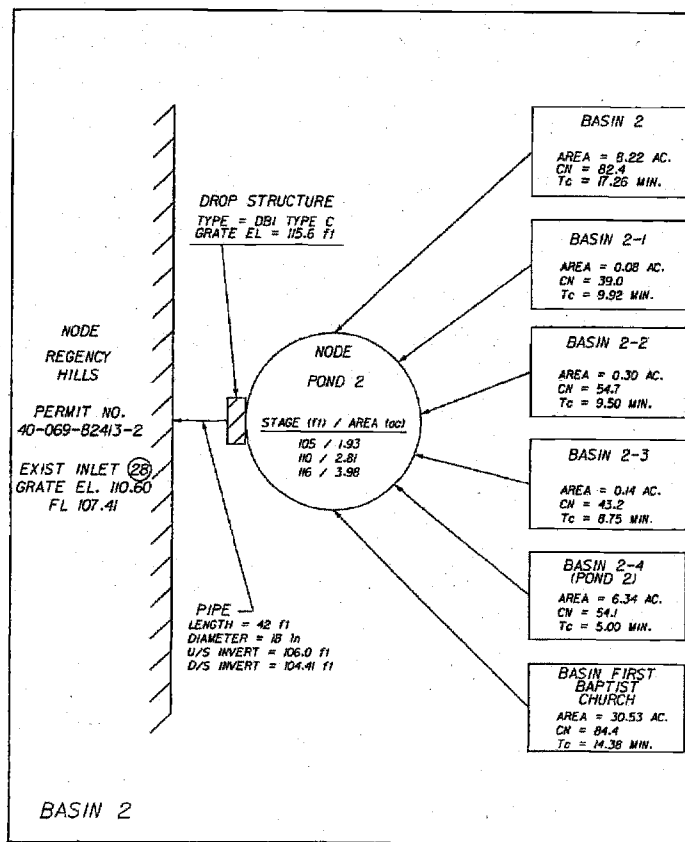
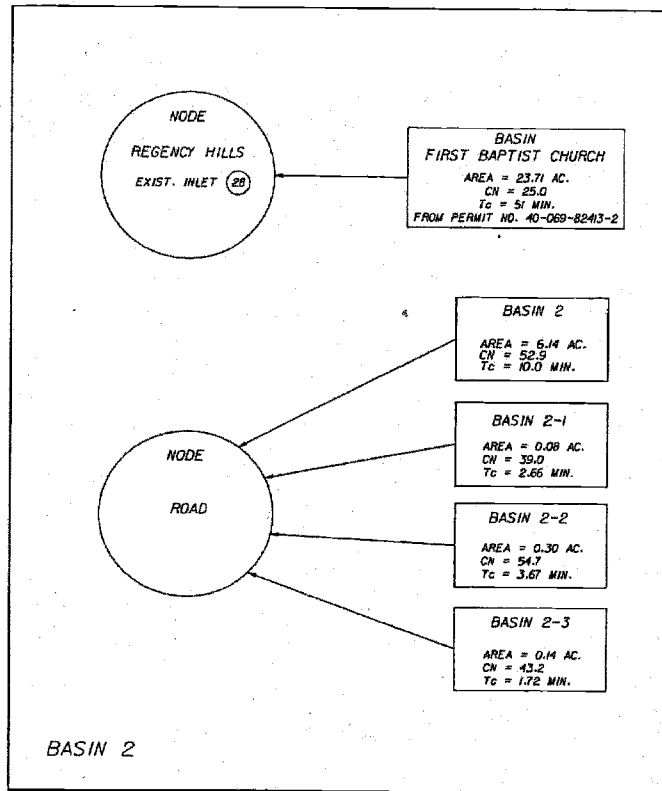
12. Please address and/or provide the following with respect to *Sheet Nos. 67, 88, 91, 92, 93, and 94* of the set of construction plans submitted:

- a. Revise *Sheet No. 67* to include specifications for the proposed *Pond 1 S-128* outfall pipe. Include all pertinent information and invert elevations.

- b. The stormsewer pipe connection between drainage structures *S-127* and the *Pond 1* mitered end section (*Sheet No. 67*), indicates a 36-inch diameter *RCP* is proposed. This appears to be inconsistent with the profile view (*Sheet No. 88*), which indicates a 42-inch diameter *RCP* is proposed. Please clarify and revise where appropriate, for accuracy with the post development condition.
- c. The *Sheet No. 88* plan view indicates 105 linear feet of 18-inch diameter *RCP* is proposed between drainage structure *S-128* and the *Pond 1* outfall. This appears to be inconsistent with the pond plan view (*Sheet No. 91*), which indicates 109 linear feet of 24-inch diameter *RCP* is proposed and the routing calculations, which indicate that 116 linear feet of 24-inch diameter *RCP* is proposed. Please clarify and revise where appropriate, for accuracy with the post development condition.
- d. The *Pond 1* bottom elevation (95.0 feet) utilized in the calculations and delineated on *Sheet Nos. 88* and *91*, appears to be inconsistent with that (less than 95.0 feet) indicated by the vertical scale for *STA 19+00.00* and *19+50.00* on *Sheet No. 93*. Please clarify and revise where appropriate, for accuracy with the post development condition.
- e. The *Pond 1* bottom elevation (95.0 feet) utilized in the calculations and delineated on *Sheet Nos. 88* and *91*, appears to be inconsistent with that (greater than 95.0 feet) indicated by the vertical scale for *STA 20+00.00* and *20+50.00* on *Sheet No. 94*. Please clarify and revise where appropriate, for accuracy with the post development condition.
- f. Amend *Sheet No. 92* to include the *SECTION A-A* detail.
- g. Revise the *Ponds 1* and *2* section details to indicate that non-muck grown sod will be used for stabilization of the proposed retention ponds. Please note that the placement of muck-grown sod may impede the percolation of runoff into the ground and is, therefore, not recommended for the stabilization of retention pond bottoms. Provide notes, as necessary, for clarification.

[40C-4.301(1)(a)(b)(c)(e)(i); 40C-42.025(4); 40C-42.026(1), F.A.C.]

- 13. Please provide documentation from the appropriate entity allowing the connection of the *Pond 2* overflow into the existing Regency Hills surface water management system. Be advised that the previously permitted master system did not include the overflow discharge from the additional basin areas. Reference the following excerpts.



Be advised that this documentation is needed in order to verify District presumptive criteria pursuant to 40C-42.025 (6) ***Design and Performance Criteria for Stormwater Management Systems***, which states that *the applicant must obtain sufficient legal authorization as appropriate prior to permit issuance for stormwater management systems which propose to utilize offsite areas to satisfy the requirements in subsection 40C-42.023(1), F.A.C. [40C-4.301(1)(i); 40C-42.025(6); 40C-42.026(1), F.A.C.]*

14. Please delineate and detail, on the set of revised plans, the physical locations of all erosion, sediment and turbidity control best management practices that will be utilized during construction of the proposed project.

- a. Include the erosion, sediment and turbidity control best management practices that will be utilized during placement of the proposed *Pond 1* outfall pipe within the wetlands.
- b. Provide details, as appropriate.

[40C-4.301(1)(i); 40C-42.025(1), F.A.C.]

15. District staff needs to be able to determine the location of all wetlands and other surface waters within the project area and the extent of work proposed within wetlands and other surface waters. During a visit to the project site on December 11, 2007, staff could not locate the wetland flags in the field. It appears that widening of the roadway may result in impacts to the wetlands along the southern lobe of Johns Lake and other unnamed wetlands and surface waters within to the project area. Note also that an environmental report included with the submittal also does not consider the location of the proposed retention pond(s) for the road expansion in relation to existing wetlands. Please address the following:

- a. Reestablish the wetland flags and contact Gayle Albers at 407-659-4882 to set up a site inspection. Provide a survey depicting the wetland flag numbers at a scale that is legible at the time of inspection.
- b. Provide an aerial map clearly labeling the onsite wetlands and other surface waters (e.g., Wetlands 1-X) and all associated impacts (e.g., Impacts 1-X).
- c. Describe how any temporarily disturbed areas will be revegetated after the proposed work is completed. Please note that the planting of non-native vegetation within these areas could adversely affect the surrounding wetland by encouraging the spread of nuisance species.
- d. Revise the construction plans to clearly depict the extent of wetlands and other surface waters within and adjacent to the project area on a plan view. Crosshatch any proposed impact areas.

e. Revise the application form (Sections A, C, and E, Tables 1-3), as necessary:

- total existing onsite wetland and other surface water acreages;
- proposed impact acreages for each wetland and other surface water;
- proposed unaffected acreages for each wetland and other surface water;
- natural community type (e.g., FLUCCS code or list abundant canopy and groundcover species) of each wetland and other surface water;
- type of impact (temporary or permanent) to each wetland and other surface water.

[40C-4.301 (1); 40C-4.302(1)(a), F.A.C.]

16. The submittal for the proposed road project does not include details on how you intend to address secondary impacts to wetlands or other surface waters that may be caused during and after construction. An applicant must provide reasonable assurance that a regulated activity will not cause unacceptable adverse secondary impacts to water resources (12.2.7, ERP A.H.). Reasonably expected activities (e.g., landscaping maintenance, increased traffic, litter) will diminish the ecological functions provided by the wetlands by destroying wildlife habitat and introducing nuisance plant species. Pursuant to subsection 12.2.7 (a), ERP A.H., one way to demonstrate that the proposed project will not have adverse secondary impacts to water resources is to establish a 15-foot minimum, 25-foot average undisturbed upland buffer landward of wetlands and other surface waters. The present design does not specify upland buffers on the construction plans or clearly demonstrate that the proposed works are sufficiently distant from offsite water resources. Please indicate how you will demonstrate that the proposed project will not have adverse unacceptable secondary impacts to water resources. Alternatively, secondary impacts will be assessed. Provide the linear extent of all impacted wetlands where adverse secondary impacts are expected to occur. Additional mitigation may be required to offset these impacts.

[40C-301(1)(d)(e)(f)(3); 40C-4.302(1)(a)2.,7.,(b), F.A.C.]

17. Should you choose to utilize upland buffers as the recourse for addressing secondary impacts to water resources, you must provide reasonable assurance that the upland buffers and unaffected onsite wetlands will remain in an undisturbed condition and that the buffers it will be sufficient to prevent secondary impacts to water resources in perpetuity. Pursuant to Subsection 12.2.7 (a), Applicant's Handbook, one way to provide such assurance is to place the upland buffer and wetland areas under a conservation easement (CE) dedicated to the District that will adequately preserve buffer structure and function. If you choose to establish a conservation easement, please specify the acreage for the preservation of onsite wetlands and uplands separately in the supporting documentation.

Please submit a draft conservation easement that is consistent with Section 704.06, Florida Statutes, and that contains restrictions ensuring the ecological viability of the site. The draft easement must (i) identify the grantor of the easement and include an appropriate signature block for the grantor, (ii) include a "Return Recorded Original to:" block in the top left hand corner of the first page of the conservation easement indicating

the recorded original easement should be returned to the Office of General Counsel, St. Johns River Water Management District, 4049 Reid Street, Palatka, Florida 32177-2529, and (iii) the permit number for the proposed project in the opening recitals. Please note that if the mitigation areas are owned in fee simple by different entities or individuals, a draft conservation easement must be submitted for each mitigation area owned by each entity or owner. Be sure to attach Exhibits. Additionally, please **submit** the following documentation in support of each conservation easement:

- a) Proof of ownership of the real property described in the conservation easement area by the grantor. Examples of such documents include, but are not limited to, an attorney's title opinion, title certificate, owners and encumbrance report or warranty deed.
- b) An attorney's title opinion, title certificate, or ownership and encumbrance report to demonstrate that the conservation easement area is not subject to any encumbrance(s) (e.g. utility easements and right of way easements) which may impair the ecological value of the area subject to the conservation easement. If encumbrances exist or will exist at the time the conservation easement is recorded, please provide a copy of the instrument creating each such encumbrance and depict the location of the encumbrance within the conservation easement area on the mitigation plans and/or surveyor's sketch.
- c) Is the property that will be encumbered by a conservation easement subject to a mortgage? If so, please submit a draft Consent and Joinder of Mortgagee containing the name of the mortgagee, the title of the mortgage document(s), including any amendments and UCC financing statements, and the official records book and page number(s) of the public records of the county where the mortgage is recorded. The Consent and Joinder of Mortgagee will need to be executed by the lending institution in the presence of two witnesses.
- d) The conservation easement must be executed by an individual who has the authority to transfer interests in the real property being encumbered by the conservation easement. Therefore, please identify the person who will be executing the easement on behalf of the grantor. If the grantor is a business entity (corporation, limited liability company, limited partnership, etc.), please identify the name and title or position of the signatory in the signature block appearing at the end of the conservation easement. Please also submit documentation of the signatory's authority to convey property interests on behalf of the business entity. Examples of such documents include, a corporate resolution, partnership or limited liability company affidavit, or partnership/operating agreement.
- e) The draft conservation easement should include as an attachment: (1) a metes and bounds legal description of the area to be placed under conservation easement, and (2) a surveyor's sketch with the easement area clearly delineated and labeled, with the acreage of the easement area noted on the sketch. Please clearly label the pages as Exhibit "___", page _ of _ . The District will need to review these

documents and approve them in writing before the easement may be recorded. Please provide the acreages for the uplands and wetlands for each easement separately.

- f) If the conservation easement area will be described by reference to a plat, please provide a copy of the plat. The conservation easement must reference the book and page number in a recorded plat. If the plat has not yet been recorded, please provide a preliminary or draft plat with the following note added to the face of the plat:

Tracts _____ are subject to a Conservation Easement in favor of the St. Johns River Water Management District pursuant to Section 704.06, Florida Statutes.

- g) Please submit a USGS quadrangle map depicting the area to be preserved by conservation easement. Please ensure that the official quad map name is included on your submittal.
- h) The District must be assured of access to mitigation areas that will be encumbered by the conservation easement. Please provide information confirming the District's right of access via public road or, if not available, a draft access easement conveying a right of access to the District.

[Sections 40C-4.301(1)(d),(f), F.A.C.; 40C-4.302(1)(a)2,7, F.A.C., 12.3.8, A.H.]

Please note that suggestions or other direction provided by District staff are offered to assist you in complying with District rules. However, even with as much guidance as we can provide, you still bear the burden of demonstrating that your proposed project meets the applicable rule requirements. Although District staff may provide suggestions to applicants that would allow staff's recommendation of approval of an application, the final decision regarding the issuance or denial of a permit may ultimately be left up to the District Governing Board. Be advised that the Governing Board is not bound by previous statement or recommendations of District staff regarding an application.

If the applicant wishes to dispute the necessity for any information requested on an application form or in a letter requesting additional information, he or she may, pursuant to section 373.4141, Florida Statutes, request that District staff process the application without the requested information. If the applicant is then unsatisfied with the District's decision regarding issuance or denial of the application, the applicant may request a section 120.569, Florida Statutes, hearing pursuant to Chapter 28-106 and section 40C-1.1007, F.A.C.

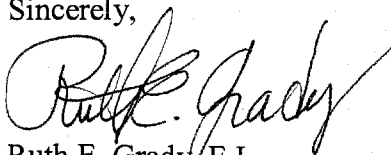
Please be advised, pursuant to subsection 40C-1.1008, F.A.C., the applicant shall have 120 days from receipt of a request for additional information regarding a permit or license application undergoing review by the District to submit that information to the District. If an applicant requires more than 120 days in which to complete an application, the applicant may notify the District in writing of the circumstances and for good cause shown, the application shall

be held in active status for additional periods commensurate with the good cause shown. Any application which has not been completed by the applicant within the given time period following a request for additional information by the District shall be subject to denial. Denial of an application due to failure to submit requested additional information shall be a denial without prejudice to the applicant's right to file a new application.

In addition, no construction shall begin on the proposed project until the St. Johns River Water Management District issues a permit. This is pursuant to subsection 40C-40.042(2), F.A.C., which states, "No construction, operation, maintenance, alteration, abandonment or removal shall be commenced until the permittee receives a written authorization to proceed from the District"; and subsection 40C-42.024(1), F.A.C, which states in relevant part, "No construction, alteration, removal, operation, maintenance, or abandonment of a stormwater management system shall be undertaken without a valid standard or individual environmental resource stormwater permit as required pursuant to this section."

District staff recommends a meeting to discuss the proposed surface water management system design and regulatory requirements. Please contact us at 407/659-4800 to arrange for an appointment to discuss the aforementioned issues.


Sincerely,



Ruth E. Grady, E.I.
Department of Water Resources



Gayle Albers, Regulatory Scientist II
Department of Water Resources

cc: PDS/RAIL-1, Sandra Joiner, Victoria Nations 

Lake County Board of County Commissioners
315 West Main Street; Tavares, FL 32778

HNTB Corporation, Attn: Ms. Karen Van den Avont, P.E.
300 Primera Boulevard, Suite 200; Lake Mary, FL 32746

Lotspeich and Associates, Inc.
2711 West Fairbanks Avenue, Winter Park, FL 32789-3314

