



St. Johns River

Water Management District

Ann B. Shortelle, Ph.D., Executive Director

601 South Lake Destiny Road, Suite 200 • Maitland, FL 32751 • (407) 659-4800
On the Internet at www.sjrwmd.com.

April 6, 2016

Thomas H Skelton
207 N Moss Rd Ste 211
Winter Springs, FL 32708-2591

Re: Application No. 145576-1
CubeSmart @ Hancock Road
(Please reference application number on all correspondence.)

Dear Mr. Skelton:

The St. Johns River Water Management District has received your Individual Environmental Resource Permit application. Upon review of the proposed project, the following technical information is needed to sufficiently review the application. This information is being requested under the authority granted to the St. Johns River Water Management District by sections 373.413(2) and 373.4131, Florida Statutes (F.S.), and rules 62-330.054, 62-330.060, 62-330.301 and 62-330.302, Florida Administrative Code (F.A.C.).

In order to expedite the review of your application, please use the application number referenced above and respond electronically through e-Permitting at floridaswater.com/permitting or submit all requested information to the District.

1. In demonstrating that the post-development phosphorus loading does not exceed the pre-development phosphorus loading per Lake Apopka Basin criteria:
 - a. Revise the land use in the pre-development condition to be the actual land use as of 2003. Based on historical aerial images from 2003, the site does not appear to have a land use of pasture. The land use in 2003 appears to be better represented by the "Forests/Abandoned Tree Crops" or "Fallow Groves" land use.
 - b. Revise the land uses in the post-development condition. It appears "Commercial" would be more appropriate for the developed area instead of "Highway." It also appears that the undeveloped portion of the basin would not have a land use of pasture. A land use of "Forests/Abandoned Tree Crops" or "Fallow Groves" may be more appropriate.
 - c. Revise the retention depth over the basin area for the post-development condition. The depth of retention should be the same over the entire basin and should not differ based on varying land use.

[62-330.301(1), F.A.C.; Section 13.7, A.H. Volume II]

2. In demonstrating that the post-development peak rate of discharge does not exceed the pre-development peak rate of discharge for the 25-year, 24-hour; 10-year, 24-hour; and the mean

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annual, 24-hour storm event, please provide the input summary and routing summary for all specified storm events. [62-330.301(1), F.A.C.]

3. The site discharges to a land-locked basin. Please demonstrate that the post-development volume of runoff does not exceed the pre-development volume of runoff for the 25-year, 96-hour storm. [62-330.301(1), F.A.C.]
4. On the plans, include a detail of the diversion walls in the inlets and manholes, and include details of the exfiltration trench. [62-330.301(1), F.A.C.]
5. Please include the parcel boundary on a plan sheet to verify the location of "Temporary Retention Area #1." It appears this retention area may be located in a parcel not owned by the applicant. If this is the case, the District would need to see additional documentation of sufficient real property interest, as specified in Section 4.2.3(d), A.H. Volume I. [Section 4.2.3(d), A.H. Volume I]
6. Please specify the operation and maintenance entity for the stormwater systems and submit documentation demonstrating this entity is acceptable. [Section 12.3, A.H. Volume I]
7. The application fee for this project is \$1,190. The District has received \$490. Please remit the remaining \$700 of the application fee. [62-330.060(2); 62-330.071(1), F.A.C.]
8. It appears that grading will occur within the ditch along the northern property boundary. Please label and quantify work within the ditch on your sheet plans (by shading or cross-hatching). [62-330.301(1); 62-330.302(1)(a), F.A.C.]

Please be aware, that suggestions or other direction provided by District staff are offered to assist applicants in complying with District rules. However, applicants bear the burden of demonstrating that their application meets the applicable rule requirements. Although District staff may provide suggestions to applicants that would allow staff to recommend approval of an application to the District's Executive Director or delegatee, the final decision regarding the approval of a permit application is up to the District's Executive Director or delegatee. If an application is recommended for denial, the application will be scheduled for consideration by the District's Governing Board. Applicants are hereby advised that the Governing Board and the Executive Director or delegatee are not bound by previous statements or recommendations of District staff regarding an application.

If the applicant desires 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, F.S, and Section 5.5.3.6, Volume I, Environmental Resource Permit Applicant's Handbook (October 1, 2013) (A.H) 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, F.S. hearing pursuant to Chapter 28-106 and rule 40C-1.1007, F.A.C.

Please be advised, that under Section 5.5.3.5, A.H., Vol. I, the applicant has 90 days from the date the District makes a timely request for additional information to submit that information to the District. If an applicant requires more than 90 days to respond, it must notify the District in writing of the circumstances, at which time the application shall remain in active status for one additional period of up to 90 days. The District will grant additional extensions for good cause shown by the applicant. A showing that the applicant is making a diligent effort to obtain the requested additional information, and that the additional time period is both reasonable and necessary to supply the information will be considered good cause. In such case, the District will grant a specified amount of additional time.

If the applicant chooses not to, or is unable to, respond to the request for additional information within the above time frames, the application will be recommended for denial at the next regularly scheduled Governing Board meeting. An administrative denial is not a determination of the merit of an application and does not preclude the applicant from reapplying at a later time. However, the applicant will not receive a refund of processing fees submitted, and the District will not apply those processing fees to a subsequently submitted permit application or notice. If an applicant cannot provide the information within the applicable timeframes, the applicant may wish to withdraw the application in accordance with section 5.5.3.7, A.H., Vol. I.

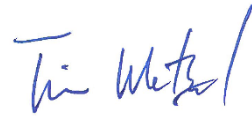
Please note that no construction may begin on the proposed project until a permit is issued by the St. Johns River Water Management District. Rule 62-330.020(2), F.A.C, requires that a permit be obtained prior to the construction, alteration, operation, maintenance, abandonment or removal of any project (as defined by rule).

If you have any questions, you are encouraged to contact Lindsey Porter at (407) 215-1453 (email at lporter@sjrwmd.com) or Tim Wetzel at (407) 659-4859 (email at twetzel@sjrwmd.com).

Sincerely,



Lindsey Porter
Engineer II
Division of Regulatory Services



Tim Wetzel
Senior Regulatory Scientist
Division of Regulatory Services

CC: Marjorie Cook, Victoria Nations

Richard Beavers, Clermont Storage Center, LLC, 1041 Crown Park Cr, Winter Garden, FL 34787