

Florida Department of Environmental Protection

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2600 Blair Stone Road
Tallahassee, Florida 32399-2400

Charlie Crist
Governor

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Lt. Governor

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Secretary

WETLAND RESOURCE/MITIGATION BANK PERMIT

PERMITTEE:

MC Davis 2006 Trust
c/o Bosso, Dentzau & Imhof, Inc.
Michael Dentzau
1882 Log Ridge Trail
Tallahassee, FL 32312

PROJECT:

Nokuse Plantation Mitigation Bank
Permit Number: 0283695-001
Date of Issue: July 3, 2008
Expiration Date: July 3, 2013, if not initiated
County: Walton

This permit is issued under the authority of Part IV of Chapter 373, F.S., and Chapter 62-342, Florida Administrative Code (F.A.C.). The activity is not exempt from the requirement to obtain this mitigation bank/wetland resource permit. Pursuant to operating agreements executed between the Department and the Water Management Districts, as referenced in Chapter 62-113, F.A.C., the Department is responsible for reviewing and taking final agency action on this activity.

This permit also constitutes certification of compliance with water quality standards under Section 401 of the Clean Water Act, 33 U.S.C. 1341, and a finding of consistency with Florida's Coastal Zone Management Program, as required by Section 307 of the Coastal Management Act.

A copy of this authorization also has been sent to the U.S. Army Corps of Engineers (USACOE) for review. The USACOE may require a separate permit. Failure to obtain this authorization prior to construction could subject you to enforcement action by that agency. You are hereby advised that authorizations also may be required by other federal, state, and local entities. This authorization does not relieve you from the requirements to obtain all other required permits and authorizations.

The above named permittee is hereby authorized to construct the work shown on the application and approved drawing(s), plans, and other documents attached hereto or on file with the Department and made a part hereof. This permit is subject to the limits, conditions, and locations of work shown in the attached drawings, and is also subject to the attached General Conditions and Specific Conditions, which are a binding part of this permit. You are advised to read and understand these drawings and conditions prior to commencing the authorized activities, and to ensure the work is conducted in conformance with all the terms, conditions, and drawings. If you are utilizing a contractor, the contractor also should read and understand these drawings and conditions prior to commencing the authorized activities. Failure to comply with all

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drawings and conditions shall constitute grounds for revocation of the permit and appropriate enforcement action. Operation of the facility is not authorized except when determined to be in conformance with all applicable rules and with the general and specific conditions of this permit, as specifically described below.

PROJECT DESCRIPTION:

On October 30, 2007, the MC Davis 2006 Trust (Davis) applied to the Department of Environmental Protection for a permit/water quality certification to establish the Nokuse Plantation Mitigation Bank (NPMB) on a \pm 2,080 acre parcel. The project includes the restoration or enhancement of wet prairie, wet flatwoods, forested depressional wetlands, mixed wetland forests, mesic flatwoods and sandhills communities. Restoration and enhancement will be accomplished by the removal of planted pine, reestablishment of historic fire regimes, planting of longleaf pine and wiregrass, controlling erosion, treating and managing exotic and nuisance species, elimination of timber roads, installation of 2 railcar bridges and 9 ditch blocks, grading of some certain bedding furrows, and the implementation of a long-term management and prescribed burn program. The mitigation was assessed by the Uniform Mitigation Assessment Method (UMAM) (Chapter 62-345, F.A.C.) as having a potential of 248.52 credits (216.21 wet prairie/wet flatwoods credits and 32.31 forested wetlands credits).

PROJECT LOCATION:

The bank site is in Sections 27-29 and 32-35, Township 1 South, Range 18 West, Walton County just south of State Road 20 and 5 miles east of US 331 near Bruce, FL (Figures 1 and 2), Class III waters, and has a service area that includes portions of Walton, Washington, Holmes, Jackson, Bay and Okaloosa Counties (Figure 3). The NPMB is bordered by Black Creek, Camp Creek, and conservation properties that form an essential link in the Northwest Florida Greenway initiative.

GENERAL CONDITIONS:

1. The terms, conditions, requirements, limitations and restrictions set forth in this permit, are "permit conditions" and are binding and enforceable pursuant to sections 403.141, 403.727, or 403.859 through 403.861, F.S. The permittee is placed on notice that the Department will review this permit periodically and may initiate enforcement action for any violation of these conditions.
2. This permit is valid only for the specific processes and operations applied for and indicated in the approved drawings or exhibits. Any unauthorized deviation from the approved drawings, exhibits, specifications, or conditions of this permit may constitute grounds for revocation and enforcement action by the Department.

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3. As provided in subsections 403.087(6) and 403.722(5), F.S., the issuance of this permit does not convey any vested rights or any exclusive privileges. Neither does it authorize any injury to public or private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. This permit is not a waiver of or approval of any other Department permit that may be required for other aspects of the total project which are not addressed in this permit.

4. This permit conveys no title to land or water, does not constitute State recognition or acknowledgment of title, and does not constitute authority for the use of submerged lands unless herein provided and the necessary title or leasehold interests have been obtained from the State. Only the Trustees of the Internal Improvement Trust Fund may express State opinion as to title.

5. This permit does not relieve the permittee from liability for harm or injury to human health or welfare, animal, or plant life, or property caused by the construction or operation of this permitted source, or from penalties therefore; nor does it allow the permittee to cause pollution in contravention of Florida Statutes and Department rules, unless specifically authorized by an order from the Department.

6. The permittee shall properly operate and maintain the facility and systems of treatment and control (and related appurtenances) that are installed and used by the permittee to achieve compliance with the conditions of this permit, are required by Department rules. This provision includes the operation of backup or auxiliary facilities or similar systems when necessary to achieve compliance with the conditions of the permit and when required by Department rules.

7. The permittee, by accepting this permit, specifically agrees to allow authorized Department personnel, upon presentation of credentials or other documents as may be required by law and at reasonable times, access to the premises where the permitted activity is located or conducted to:

- a. Have access to and copy any records that must be kept under conditions of the permit;
- b. Inspect the facility, equipment, practices, or operations regulated or required under this permit; and
- c. Sample or monitor any substances or parameters at any location reasonable necessary to assure compliance with this permit or Department rules.

Reasonable time may depend on the nature of the concern being investigated.

8. If, for any reason, the permittee does not comply with or will be unable to comply with any condition or limitation specified in this permit, the permittee shall immediately provide the Department with the following information:

- a. A description of and cause of noncompliance; and

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- b. The period of noncompliance, including dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncompliance. The permittee shall be responsible for any and all damages which may result and may be subject to enforcement action by the Department for penalties or for revocation of this permit.

9. In accepting this permit, the permittee understands and agrees that all records, notes, monitoring data and other information relating to the construction or operation of this permitted source which are submitted to the Department may be used by the Department as evidence in any enforcement case involving the permitted source arising under the Florida Statutes or Department rules, except where such use is prescribed by sections 403.111 and 403.73, F.S. Such evidence shall only be used to the extent it is consistent with the Florida Rules of Civil Procedure and appropriate evidentiary rules.

10. The permittee agrees to comply with changes in Department rules and Florida Statutes after a reasonable time for compliance; provided, however, the permittee does not waive any other rights granted by Florida Statutes or Department rules. A reasonable time for compliance with a new or amended surface water quality standard, other than those standards addressed in rule 62-302.500, F.A.C., shall include a reasonable time to obtain or be denied a mixing zone for the new or amended standard.

11. This permit is transferable only upon Department approval in accordance with rules 62-4.120 and 62-730.300, F.A.C., as applicable. The permittee shall be liable for any non-compliance of the permitted activity until the transfer is approved by the Department.

12. This permit or a copy thereof shall be kept at the work site of the permitted activity.

13. This permit also constitutes Certification of Compliance with State Water Quality Standards (Section 401, PL 92-500).

14. The permittee shall comply with the following:
 - a. Upon request, the permittee shall furnish all records and plans required under Department rules. During enforcement actions, the retention period for all records will be extended automatically unless otherwise stipulated by the Department.
 - b. The permittee shall hold at the facility or other location designated by this permit records of all monitoring information (including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation) required by the permit, copies of all reports required by this permit, and records of all data used to complete the

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application for this permit. These materials shall be retained at least three years from the date of the sample, measurement, report, or application unless otherwise specified by Department rule.

- c. Records of monitoring information shall include:
 1. the date, exact place, and time of sampling or measurements;
 2. the person responsible for performing the sampling or measurements;
 3. the dates analyses were performed;
 4. the person responsible for performing the analyses;
 5. the analytical techniques or methods used; and
 6. the results of such analyses.

15. When requested by the Department, the permittee shall within a reasonable time furnish any information required by law which is needed to determine compliance with the permit. If the permittee becomes aware the relevant facts were not submitted or were incorrect in the permit application or in any report to the Department, such facts or information shall be corrected promptly.

SPECIFIC CONDITIONS: Please note that some specific conditions may further define or substitute for some of the requirements of the general conditions listed above.

1. The permittee is hereby advised that Florida law states: "No person shall commence any excavation, construction, or other activity involving the use of sovereign or other lands of the state, title to which is vested in the Board of Trustees of the Internal Improvement Trust Fund or the Department of Environmental Protection under Chapter 253, until such person has received from the Board of Trustees of the Internal Improvement Trust Fund the required lease, license, easement, or other form of consent authorizing the proposed use." Pursuant to Florida Administrative Code Rule 18-14, if such work is done without consent, or if a person otherwise damages state land or products of state land, the Board of Trustees may levy administrative fines of up to \$10,000 per offense.

2. Prior to conducting the restoration activities involving soil disturbance authorized by this permit, a cultural resource survey shall be conducted consistent with the Department of Historical Resources (DHS) letter dated January 30, 2008 (attached). The findings of this survey shall be reported to the Department as well as DHS, and additional avoidance and minimization measures may be required. Further, if, at any time, historical or archaeological artifacts, such as Indian canoes, are discovered at any time within the project site the permittee shall immediately notify the Department and the Bureau of Historic Preservation, Division of Historical Resources, at (800) 847-7278, R. A. Gray Building, 500 S. Bronough St., Tallahassee, Florida 32399-0250.

Commencement requirements:

3. At least 48 hours prior to commencement of work authorized by this permit, the permittee shall notify the Department of Environmental Protection, Office of Submerged Lands and Environmental Resources, MS 2500, 2600 Blair Stone Road, Tallahassee, Florida 32399, and the Northwest District Office, Submerged Lands and Environmental Resource Permitting, 160 Governmental Center, Pensacola, FL 32502 in writing of this commencement.
4. Unless otherwise specified, all reports and other information required for this permit shall be submitted to the Florida Department of Environmental Protection, Office of Submerged Lands and Environmental Resources, MS 2500, 2600 Blair Stone Road, Tallahassee, Florida 32399-2400.
5. No credits may be released until the following requirements are completed:
 - a. A qualified mitigation supervisor (QMS) is retained as required in Specific Condition 7;
 - b. The site has been protected in accordance with Specific Condition 8; and
 - c. The applicant is in compliance with Specific Condition 9 regarding documentation of financial assurance.
6. This mitigation bank permit shall automatically expire five years from the date of issuance if the permittee has not recorded a conservation easement in accordance with the permit and Rule 62-342.750 (2) F.A.C. Except as provided above, this mitigation bank permit shall be perpetual unless revoked or modified.
7. Project Oversight. Prior to commencement of mitigation activities authorized in Specific Conditions 10-14 of this permit, the permittee shall retain a qualified mitigation supervisor (QMS) to oversee all aspects of mitigation bank site implementation, management, monitoring, and corrective actions in this permit until final success criteria are met and a long-term management entity is established.
 - a. The QMS will serve as the principle contact and manager regarding mitigation activities, including reporting; however, the permittee shall have ultimate responsibility to ensure that the mitigation bank requirements are conducted in accordance with the permit.
 - b. Within 30 days of issuance of this permit the permittee shall submit the name of the QMS retained to oversee the mitigation work and provide supporting documentation demonstrating that the QMS is authorized and qualified to oversee this work. The QMS must be approved by the Department prior to commencement of the mitigation activities.

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c. Within 30 days of the discharge of any approved QMS, the permittee shall submit the name and supporting documentation of a new QMS to the Department for its review and approval.

d. The permittee shall have the approved QMS review the conditions of this permit that pertain to environmental improvement. The purpose of this review is to ascertain whether any criteria need to be modified to ensure ecological success. If the Department concurs that any proposed modifications would improve the likelihood of mitigation success, these changes shall be incorporated into this permit as a minor modification.

8. Protection and Preservation. The Nokuse Plantation area shown in Figure 2 has already been protected with a conservation easement that was granted to the Board of Trustees of the Internal Improvement Trust Fund of the State of Florida, a copy of which is contained in the permit application file. This easement restricts development on the site but does not require restoration or enhancement of the property. Thus, prior to the release of credits, the Nokuse Plantation Mitigation Bank area shall be preserved and protected in accordance with an additional conservation easement granted to the Department of Environmental Protection. A copy of draft language is contained in the permit application file; however, prior to recording the conservation easement, the permittee shall provide the final draft of the easement, survey and title commitment to the Department for approval.

After recording the conservation easement, the permittee shall provide original copies of the following:

- a. A title insurance policy for the easement.
- b. Copies of subordination, release, or joinder agreements for any lien on the property, as identified by the Title Commitment, unless such lien does not adversely affect the ecological viability of the Bank.
- c. A specific purpose survey and sketches of the conservation easement signed by a Florida registered land surveyor.
- d. A clerk-of-the-court certified copy of the conservation easement.

The preservation of the lands has not been assigned any environmental lift in this permit and has not been used to generate credits. Locked gates, fencing as appropriate, signage identifying the Bank, and monitoring shall be implemented in accordance with Attachment A - Security Plan, no later than 30 days after permit issuance.

9. Financial Assurance. The permittee shall provide the Department with the financial responsibility mechanisms required by Rule 62-342.700 F.A.C. The permittee shall secure financial assurance for implementation (construction activities, monitoring,

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maintenance, and reporting prior to success), and for long-term management activities as follows:

- a. The permittee shall establish the financial assurance for implementation prior to a credit release (Rule 62-342.700 (4), F.A.C.) in a form of a standby trust secured with a letter of credit for \$500,000.00. The permittee may request a partial reduction in the amount of the implementation assurance after the successful completion significant mitigation activities, based upon a revised cost estimate. The permittee may request a release from its implementation financial assurance obligation upon the determination that the bank has attained final success criteria and the long-term management has been properly funded.
- b. The permittee shall establish the financial assurance for perpetual management at least 60 days prior to the withdrawal of credits from the Mitigation Bank (Rule 62-342.700(9), F.A.C.). The amount of financial responsibility provided shall be sufficient to generate annual revenue equal to the anticipated annual cost of perpetual management at an assumed average rate of return of 6% per annum. Prior to the determination of final success in accordance with Specific Condition 22, the long-term management trust fund shall be fully funded in cash.

All cost-estimates shall be reviewed and appropriate financial responsibility adjustments shall be conducted by the banker on a minimum of two-year intervals, in accordance with Rule 62-342.700 (11) F.A.C. and prior to the final credit release. The cost estimate for the restoration and management activities defined in this permit are provided in Attachment B - Cost Estimate.

Mitigation Activities:

Figure 4 shows the existing community types and configuration. The goals of the mitigation activities, schematically represented in Figure 5 and defined in Specific Conditions 10-13, are to establish native wetland and upland habitats in the existing silviculture property resulting in the community configuration shown in Figure 6, and described in Attachment C - Target Natural Community Descriptions. The mitigation activities are to be initially implemented by management units as represented in Figure 7 which have been determined based upon existing management roads and fire breaks. Once communities have been re-established, these management units will blend into larger areas based upon the roads and trails which need to be left in place (Figure 8). The mitigation activities are to include harvesting of silviculture pines, planting of longleaf pine, prescribed fire management, abandonment of roads, removal of culverts, herbaceous augmentation, leveling of pine beds, installation of timber bridges, and installation of ditch blocks.

10. Community restoration activities are as follows:

a. Pine and Brush Reduction.

1. Pine Plantation to Wet Flatwoods: Within the Bank there are approximately 711 acres of wet pine plantation as shown in Figure 4. Within 1 year of permit issuance, the planted pine within the wet pine plantation shall be thinned/reduced to no more than 75 trees/acre in a manner that is consistent with "Silviculture Best Management Practices for Florida", 1993, Florida Department of Agriculture and Consumer Services, 98 pp., herein referenced as silviculture "BMPs". Within the 100 foot area of plantation surrounding the depressional hardwood wetlands (Figure 5), the trees will be further reduced to no more than 35 trees/acre. Precautions to minimize disturbance of groundcover and non-target species will be implemented. These activities will be completed during dry times, to the greatest extent possible, to minimize soil disturbance.
2. Wet Prairie/ Wet Flatwoods Enhancement: Within the Bank there are approximately 278 acres of wet prairie and flatwoods as shown in Figure 4. Within 1 year of permit issuance, the pine within this area shall be thinned/reduced to no more than 35 trees/acre. Given the substantial groundcover in this community, this thinning will be conducted by hand through either girdling and leaving in place or chain saw felling in place.
3. Pine Plantation to Mesic Flatwoods: There are approximately 575 acres of upland pine plantation as shown in Figure 4. Within 1 year of permit issuance, the planted pine shall be thinned/reduced to no more than 100 trees/acre using accepted BMPs.
4. Hardwood Depressional Wetlands Enhancement: There are approximately 27 acres of Depressional Wetlands (gum swamps) within the Bank as shown in Figure 4. Within 1 year of permit issuance, the pine shall be thinned/reduced to no more than 15 trees/acre. Trees on the perimeter of these areas will be cut and removed, while those in the interior will be girdled and left standing to minimize impacts to soils.
5. Brush Reduction. Within 1 year of permit issuance, the subcanopy coverage of woody shrub material (d.b.h. <4"), including slash pine, gallberry, fetterbush and titi, will be reduced by mechanical cutting with low ground-pressure equipment within approximately 82 acres encompassing the Depressional Wetlands (gum swamps) and a 100' zone surrounding the depressions (Figure 5). Brush reduction may be completed in other areas

based upon the discretion of the QMS. Such areas might include, but not be limited to, the transitional zones to forested wetlands in an effort to increase the diversity of the transitional zone.

b. Recontouring of Elevations.

1. **Wet Flatwoods.** Within 2 years of permit issuance, certain pine beds shall be partially leveled based upon the evaluation of the QMS. The criteria to be evaluated to determine if these actions are warranted include an assessment of the indication of drainage through the furrows, the degree of coverage by fire adapted native herbaceous species, and the height of the bedding. If drainage is deemed to be occurring, the Department will be notified and minor grading and/or the construction of shallow fill blocks will be conducted. Additionally, in areas where minimal herbaceous cover exists, regardless of whether drainage is occurring, the pine beds will be bladed perpendicular to the beds in a manner that excavates elevated ridges and fills depressions. An alternative methodology consisting of disking the bedded areas may also be employed if deemed appropriate to loosen soils. The degree of these restoration activities will be based upon the assessment of the QMS in concurrence with the Department.
2. **Wet Flatwoods Surrounding Depressional Wetlands.** Within 2 years of permit issuance, any pine bedding within 100' surrounding the Depressional Wetlands (Figure 9), will be recontoured. This will be accomplished by blading or disking perpendicular to the beds in a manner that excavates elevated ridges and fills depressions on a minimum of 100' intervals.

c. Planting and Seeding.

1. **Mesic Flatwoods from Plantation.** After the reduction of pines to less than 100 trees/acre as outlined in 10(a)(3) above, but no later than 6 years after permit issuance, 100 longleaf pine seedlings/acre will be planted over approximately 575 acres (total of 57,500 longleaf seedlings) in an irregular pattern.
2. **Wet Flatwoods (Hydric Pine Flatwoods) from Plantation.** Subsequent to pine reduction as outlined in 10(a)(1) above and two (2) prescribed fires, but no later than 5 years from issuance of permit, the herbaceous ground cover will be reviewed to determine the percent cover of fire dependent herbaceous species. If this cover/density is less than 35%, then the Groundcover Restoration protocol provided in Attachment D, will be implemented in the next planting/seeding season.

3. **Depressional Wetlands and Surrounding Flatwoods in 100' Buffer.**
Within 2 years of the pine, brush and bedding removal and at least one prescribed burn, the Groundcover Restoration protocol provided in Attachment D will be implemented where herbaceous cover/density is less than 45% (Figure 5).

11. Exotic and nuisance vegetation control. Invasive exotic and nuisance vegetation, including but not limited to Chinese tallow (*Sapium sebiferum*), cogon grass (*Imperata cylindrica*) and Japanese climbing fern (*Lygodium japonicum*) shall be controlled by appropriate measures including herbicide application and/or physical removal. Exotic and nuisance species control will be conducted under the direction of the QMS. Prior to any treatment event, it will be the responsibility of the QMS to review the current status of the science to determine the most effective treatment that minimizes non-target impact. These efforts will be fully documented in the monitoring reports detailed in Specific Condition Nos. 26 and 27. An initial survey for exotic coverage shall be completed within 30 days of issuance of the permit. This will entail the identification and GPS location of areas of infestation by species and a recommended action plan which will be submitted to the Department and the MBRT prior to execution for review and approval. Invasive exotic and nuisance species of concern shall be those listed by the Florida Exotic Pest Plant Council (FLEPPC), 2007 (attached and also at Internet: http://www.fleppc.org/list/07list_ctrfld.pdf) in Category I and II.

12. Fire Management Plan. Prescribed fire shall be implemented in the upland, wet flatwoods and wet prairie communities on a 1-3 year schedule to attain the proposed enhancement, and as a long-term management tool to sustain the proposed communities and function. The site has initially been divided into 27 burn units that have been determined by natural fire breaks (flood plain systems) and existing roads/trails. These burn units correspond to the Management Units defined in Figure 7, and burning shall be in accordance with the approved fire management plan in Attachment E.

Each management unit shall be burned with a maximum return interval of 4 years. If, for any reason, all or portions of the upland, wet flatwoods or wet prairie management units are not burned within 4 years of the day of the previous burn in that management unit(s), the permittee shall provide a report to the Department within 30 days that documents why this permit criterion could not be attained, and assesses the condition and suggested remedies for the management unit.

A conceptual fire prescription is included in the fire management plan; however, each prescribed burn activity will be developed and supervised by a certified burn specialist. Within 30 days following each prescribed burn activity conducted at the bank, the permittee shall submit documentation, signed by the QMS and certified burn specialist, that a burn was conducted, and provide a summary of the unit(s) and acres treated with

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assessment of burn success, including photographs. For the purposes of this permit, a successful burn shall mean the fire shall carry over a minimum of 70% of each targeted community within the burn unit, and the herbaceous groundcover is regenerating ("greening up") in the burned area.

After substantial community restoration has been completed and roads for timber harvesting are abandoned, these fire management units will coalesce into larger units as depicted in Figure 8.

13. Hydrologic Enhancements. Within 3 years of permit issuance, hydrologic enhancements including the abandonment and removal of approximately 10 acres of dirt roads, the removal of road fill and culverts at 6 creek crossings, the installation of railroad box car bridges at 2 locations, and the placement of ditch blocks in any roadside ditches that prevent flow into natural drainage sloughs or stringers shall be conducted in accordance with Figures 10-14 and the following conditions. During all construction activities, BMPs including silt fences and staked hay bales shall be used as necessary to prevent turbid runoff into adjacent surface waters.

a. After pine removal activities described in Specific Condition 10.a. have been completed, approximately 10 acres of dirt roads within wetlands will be abandoned and removed as necessary (Figures 10 and 11). This will involve an inspection of each road to determine the specific requirements for removal, which will consist, at a minimum, of grading elevated portions of roads into adjacent borrow ditches, removing fill and culverts from floodplain crossings, and the filling of vehicular ruts. Following this inspection, the final plan for removal will be submitted to the Department as a modification of the permit. In addition, any and all areas that have been negatively impacted by the timber removal will be graded and stabilized to enhance re-vegetation and reduce the potential for future erosion.

b. Six road crossings of wetlands or streams shall be restored to natural contours after pine removal activities have been completed (Figures 10 and 12). These areas consist of traditional access points that are either substantially at grade or are culverted. The road fill and culverts shall be excavated to attain adjacent natural grade, or when apparent, to the native soils. Fill material will be removed to an appropriate upland site. Care will be taken to leave a surface area that has appropriate soils for colonization by native plants typical of the community type.

c. A railroad boxcar bridge shall be installed at two stream crossings to maintain access within minimal impact on natural contours and vegetation (Figures 10 and 13).

d. A minimum of nine (9) ditch blocks will be established in the approximate locations to block drainage from roadside ditches into natural drainage sloughs or

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stringers, as shown in Figures 10 and 14. These blocks will be established from existing material onsite to match adjacent elevations.

e. All culverts and rubbish shall be removed from the site to an appropriate upland disposal area. Silt fence shall remain as necessary until such time as all grades have been stabilized, then removed.

f. The permittee shall submit a detailed report of all restorations within 60 days of completion of the work at each site noted above. In addition, when all hydrologic enhancements are substantially completed, and prior to the credit release associated with the completion of construction, the permittee shall arrange a post-construction site visit that includes the Department, QMS, and any Mitigation Bank Review Team (MBRT) members that are available to review the activities. The permittee shall submit a summary of the site visit for the file to facilitate future compliance reviews.

14. Turbidity Controls. Best Management Practices for the control of turbidity and erosion, and for silviculture associated with pine harvesting, shall be implemented on site. Erosion and turbidity control measures shall be inspected regularly and turbidity monitored as necessary until work has been completed to ensure that the water quality standards are not violated.

The graded areas shall be stabilized within 48 hours of attaining final grades and at any other time necessary to prevent erosion, siltation and turbid discharges into surface waters in violation of state water quality standards.

The following measures shall be taken by the permittee whenever construction activities result in the turbidity levels in surface waters surrounding the project site exceed state water quality standards pursuant to Rule 62-302, F.A.C.:

- a. Immediately cease work contributing to the water quality standard exceedence.
- b. Modify the work procedures that were responsible for the exceedence, install more turbidity controls if necessary, and repair any non-functioning turbidity containment devices.
- c. Notify the Office of Submerged Lands and Environmental Resources at 850-245-8492, or Northwest Florida Office of the Department, within 24 hours of the time the exceedence is first detected.

15. Work schedule. Mitigation activities are expected to occur over a 6-10 year period. The sequence of activities and dates given below are relative estimates to be used as guidelines. Variation in this schedule may be authorized with concurrence of the Department upon written request from the permittee.

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Activity	Estimated Completion Date
▶ Baseline assessments of vegetation.	2007/2008
▶ Selection/approval of QMS (SC #7)	Completed 5/08
▶ Fencing and signage of site (SC #8)	Completed 5/08
▶ Implementation of Security Plan (SC #8)	4/08 and Ongoing
▶ First Prescribed Fire in Management Units 1-8 (SC#12)	2008
▶ Inspect Site for Exotic and Nuisance Species	Spring '08
▶ Exotic and Nuisance Species Control, as necessary	2008 and Ongoing
▶ Pine and Brush Reduction (SC #10)	2008
▶ Monitoring Year 1 / Annual Report Preparation	Fall 2008
▶ Recontouring of Pine Beds as Necessary (SC #10)	2009
▶ Installation of 2 Railcar Bridges (SC #13)	2009
▶ Groundcover Augmentation in Depressional Wetlands and Surrounding Wet Flatwoods (SC #10)	2009
▶ Monitoring Year 2 / Annual Report Preparation	Fall 2009
▶ Remove Fill-Road Crossings; Install Ditch Blocks (SC #13)	2010
▶ First Prescribed Fire in Management Units 9-27	2010
▶ Second Prescribed Fire in Management Units 1-8	2010
▶ Monitoring Year 3 / Annual Report Preparation	Fall 2010
▶ Monitoring Year 4 / Annual Report Preparation	Fall 2011
▶ Second Prescribed Fire in Management Units 9-27	2012
▶ Monitoring Year 5 / Annual Report Preparation	Fall 2012
▶ Groundcover Augmentation in Wet Flatwoods (SC #10)	2013
▶ Monitoring Year 6 / Annual Report Preparation;	Fall 2013
▶ Groundcover/Longleaf Planting-Mesic Flatwoods (SC10)	2013
▶ Monitoring Year 7 / Annual Report Preparation	Fall 2014
▶ Monitoring Year 8 / Annual Report Preparation	Fall 2015
▶ Monitoring Year 9/ Annual Report Preparation	Fall 2016
▶ Monitoring Year 10/ Annual Report Preparation.	Fall 2017
▶ Perpetual ecological management.	2017+

Banking Operations:

16. As specified in Rule 62-342.470(4) F.A.C., if at any time the bank is not in material compliance with the terms of this permit or subsequent modifications, no mitigation credits may be released or withdrawn. Mitigation credits shall again be available if the permittee comes back into compliance.

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17. Assessment of Credits: As a result of mitigation activities, the Nokuse Plantation Mitigation Bank has the potential to provide for a total of 248.52 credits (216.21 Wet Prairie/Wet Flatwoods mitigation credits and 32.31 Forested Wetland mitigation credits) following final bank wide success. Credits were assessed using the Unified Mitigation Assessment Method (UMAM), Chapter 62-345, F.A.C., as shown in Attachment F. These credits will be released incrementally, as detailed in Specific Condition 19.

18. Ledger: In order to track credit releases and withdrawals, the Department and permittee shall keep a ledger indicating all potential, released, withdrawn and available credits. The format for the ledger, indicating potential credits, is attached as Attachment G.

19. Credit Release Schedule. Mitigation credits will be released for use according to the following Credit Release Schedule table based on the timeframes anticipated in Specific Condition 15. The actual credit release will be determined by when the specified activity is completed or criteria achieved, which may be before or after the estimated date. Credit releases shall be in accordance with the following table.

Task	Specific Conditions	% Credit Release	Flatwoods/ Wet Prairie Credits	Mixed Hardwoods Credits	Total Credits
Record CE; Security; QMS; Financial Assurances	5, 7, 8, 9	10.0	21.6	3.23	24.83
Exotics Control; Pine and Brush Reduction	10,11	10.0	21.6	3.23	24.83
1 st Prescribed Fire; Recontour Beds.	10,12	10.0	21.6	3.23	24.83
Hydrologic Work;	13,14	10.0	21.6	3.23	24.83
Second Prescribed Fire; Groundcover planting	10, 12	10.0	21.6	3.23	24.83
Attainment of 1 st Interim Success	23	10.0	21.6	3.23	24.83
Attainment of 2 nd Interim Success	23	10.0	21.6	3.23	24.83
Attainment of 3 rd Interim Success	23	10.0	21.6	3.23	24.83
Attainment of 4 th Interim Success	23	10.0	21.6	3.23	24.83
Attainment of final success criteria	22	10.0	21.81	3.24	25.05
TOTALS		100.0	216.21	32.31	248.52

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Successive interim credit releases are anticipated to be 2 years apart; however, they may be released on an annual basis provided the criteria in Specific Condition 23 are met.

Upon completion of a credit release activity, the permittee may submit a minor modification request, along with supporting documentation, for the release of the appropriate number of credits. This request shall be made in writing to the Office of Submerged Lands and Environmental Resources. The Department shall review the documentation, conduct a site visit to determine if the documentation is representative of on-site conditions, and perform a compliance review of the permit, prior to the issuance or denial of the minor modification to release credits. An updated ledger indicating the additional available credits shall be attached to the minor modification.

20. Mitigation Credit Withdrawal: Withdrawal of the mitigation bank credits as mitigation for wetland impacts shall be accomplished through a minor modification of this permit. Modification requests for credit withdrawal shall not require a modification fee. Modification requests shall be made in writing to the Office of Submerged Lands and Environmental Resources in Tallahassee. Minor modification requests shall only be submitted by the bank permittee. The modification request shall include:

- a. a complete list of all Department or Water Management District permits (or other applicable regulatory actions) that require mitigation credits from the NPMB,
- b. the permit number, issue date and environmental permit processor/reviewer,
- c. an identification of the number and type of wetland credits required under each of these permits.

An updated mitigation bank credit ledger sheet shall be included by the Department as an attachment to each minor modification approval for credit withdrawal.

21. Mitigation Service Area: The mitigation service area (MSA) is the geographic area within which adverse impacts may be offset by the bank. The MSA for the Nokuse Plantation Mitigation Bank is depicted in Figure 3. The MSA includes lands within Walton, Washington, Holmes, Jackson, Bay and Okaloosa Counties. The Bank will not be used as mitigation for areas of South Walton County that drain southerly into either the Gulf of Mexico or the Coastal Dune Lakes.

Release and Success Criteria:

22. Final Success. The goal of the mitigation is to rehabilitate or enhance the existing communities shown in Figure 4 into the target communities shown in Figure 6 and as described in Attachment C. The bank shall be deemed successful when all of the following criteria, in addition to the community descriptions in Attachment C, have been met for one full year without intervention in the form of nuisance and exotic vegetation treatment, pine harvesting or replanting of desirable vegetation.

- a. Entire Site. Nuisance exotic species listed in FLEPPC are restricted to less than 1% cover in any one acre.
- b. Uplands – Mesic Flatwoods and Sandhills.
 1. Less than 100 trees/acre of slash (*Pinus eliotii*) and loblolly pines (*Pinus taeda*) with a d.b.h. ≥ 4 ”;
 2. A minimum of 50 longleaf pine (*Pinus palustris*) subcanopy and/or canopy trees/acre, but no more than 150/ac. of planted longleaf pine.
 3. Fire-adapted, native herbaceous species are of adequate density to carry a prescribed fire over an average of at least 70% of the upland communities.
 4. Subcanopy shrub cover/density (>1 ” and <4 ” d.b.h.) is less than 35% as determined by a combination of density and coverage estimates.
 5. Gopher tortoise burrows average a minimum of one burrow per acre over the approximate 500 acres suitable for burrow habitat.
- c. Wet Flatwoods (from Pine Plantation).
 1. Less than 75 trees/acre canopy pines (*Pinus* spp.) with a d.b.h. ≥ 4 ”.
 2. Gallberry, yaupon, wax myrtle, fetterbush, titi and other woody shrubs shall be no taller than the coppice sprouts that could have arisen from root crowns following the most recent successful fire. Areas dominated by woody shrubs (i.e. areas with shrubs averaging 1.5 meters in height and a collective canopy coverage of over 50%) shall be limited to random spots of 1 ac. or less where fire did not burn and shall represent an insignificant feature in this community type.
 3. The average cover/density of herbaceous groundcover (including graminoids, forbs and ferns) shall be 70% or greater, with no one monitoring quadrat having less than 50% cover/density, and the collective coverage of *Andropogon* spp. (except *A. liebmannii*) shall not exceed 25% in any one quadrat.

4. Prescribed fire routinely carries over a minimum of 70% of the community type after each burn. The exception to this would be for extremely wet years in which a burn was implemented to comply with the maximum burn intervals stated in the permit even though the conditions were not ideal from a hydrologic standpoint.
 5. There is an average of at least of 40 species typical of wet flatwoods and prairie such as those listed in Attachment H). Species may be added to the list with the written consent of the Department.
 6. Evidence of flowering by helophytic plant species.
- d. Wet Prairie/Wet Flatwoods Enhancement Area.
1. Less than 35 trees/acre canopy pines (*Pinus* spp.) with a d.b.h. $\geq 4''$.
 2. Gallberry, yaupon, wax myrtle, fetterbush, titi and other woody shrubs shall be no taller than the coppice sprouts that could have arisen from root crowns following the most recent successful fire. Areas dominated by woody shrubs (i.e. areas with shrubs averaging 1.5 meters in height and a collective canopy coverage of over 50%) shall be limited to random spots of 1 ac. or less where fire did not burn and shall represent an insignificant feature in this community type.
 3. The average cover/density of herbaceous groundcover (including graminoids, forbs and ferns) shall be 70% or greater, with no one monitoring quadrat having less than 50% cover/density, and the collective coverage of *Andropogon* spp. (except *A. liebmannii*) shall not exceed 25% in any one quadrat.
 4. Prescribed fire routinely carries over a minimum of 70% of the community type after each burn. The exception to this would be for extremely wet years in which a burn was implemented to comply with the maximum burn intervals stated in the permit even though the conditions were not ideal from a hydrologic standpoint.
 5. There is an average of at least of 40 species typical of wet flatwoods and prairie such as those listed in Attachment H. Species may be added to the list with the written consent of the Department.
 6. Evidence of flowering by helophytic plant species.
- e. Hardwood Depression Wetlands & 100' Buffer Surrounding Depressions.
1. Less than 15 trees/acre canopy pines (*Pinus* spp.) with a d.b.h. $\geq 4''$ on average within the Depressional Wetlands and less 35 trees/acre on average within the surrounding 100' buffer.
 2. Subcanopy shrub (>1" and <4" d.b.h.) cover/density within the buffer and into the edge of the Depressional Wetlands is less than 20%.

3. The average cover/density of herbaceous groundcover (including graminoids, forbs and ferns) shall be 70% or greater, with no one monitoring quadrat having less than 50% cover/density, and the collective coverage of *Andropogon spp.* (except *A. liebmannii*) shall not exceed 25% in any one quadrat.
4. Prescribed fire routinely carries over a minimum of 70% of the perimeter of the depression area and may burn into the depression on occasion. The exception to this would be for extremely wet years in which a burn was implemented to comply with the maximum burn intervals stated in the permit even though the conditions were not ideal from a hydrologic standpoint.

f. Mixed Forest Wetlands and Baygall.

1. Inspections shall indicate that conditions are not exhibiting signs of degradation or impact.
2. Management is appropriate to ensure that plants are reproducing naturally, either by normal, healthy vegetative spread (in ways that would be normal for each wetland species) or through seedling establishment, growth and survival.

g. Hydrologic Enhancements (stream crossing, road removal, ditch blocks).

1. Non-vegetated open water area in stream crossings shall be less than 20%.
2. All slopes are stabilized with native vegetation.
3. Restored/abandoned areas shall not be substantially distinct topographically from the surrounding undisturbed areas.
4. Recruitment of native vegetation is demonstrated.
5. Ditch blocks are in place and stabilized and successfully eliminating water flow through or around the block.

h. UMAM Assessment: Using monitoring data and reports and in conjunction with the permittee and available members of the Mitigation Bank Review Team, the Department shall inspect the site and conduct a UMAM analysis to ensure that all communities have reached, or are expected to reach and maintain, the "with bank" scores in Attachment F or community descriptions in Attachment C, under the permitted management requirements in Specific Condition 24.

i. Compliance:

1. The permittee has conducted inspections, monitoring and management, including the appropriate schedule of prescribed burns,

as defined herein and in the attachments, and has submitted all required reports to the satisfaction of the Department.

2. All security measures are established and in working order.
3. A long term management plan as defined in Specific Condition 24.f. and long term management entity has been submitted and approved, and the long term management trust fund has been funded in compliance with Specific Condition 9.

23. Interim release criteria. Ecological enhancement over time or “trending toward success” provides environmental lift for which credit may be released incrementally prior to achieving all the final success criteria delineated in Specific Condition 22. Forty percent of the total potential credits are reserved for interim credit releases, anticipated for years 2, 4, 6 and 8. However, credits may be released on an annual basis whenever representative monitoring data provided in Annual Reports, as verified by a Department site inspection, indicate that:

- a. There is less than 1% FLEPPC nuisance exotic vegetation cover per acre;
- b. Preservation areas are maintaining or improving in function;
- c. Target pine density in the Mesic Flatwoods, Sandhills, Wet Flatwoods, Wet Prairie and Depressional Wetlands is maintained.
- d. Prescribed burns have been conducted in accordance with the season and schedule described in Attachment E;
- e. The project is in compliance with this permit and subsequent modifications.
- f. For the 1st interim success period, there is at least 35% cover by herbaceous species within wet flatwoods community and ditch blocks and railcar bridges have been installed.
- g. For the 2nd interim success period, there is at least 40% cover by herbaceous species and at least one successful prescribed fire within wet flatwoods community, and all hydrologic enhancements in Specific Condition 13 have been completed and stabilized.
- h. For the 3rd interim success period, there is at least 45% cover by herbaceous species within wet flatwoods community.
- i. For the 4th interim success period, there is at least 50% cover by herbaceous species and at least two successful prescribed fires within wet flatwoods community.

24. Management and Long-term Maintenance. Monitoring data, observation and the QMS's professional judgment will dictate the type and frequency of management activities described below. Additional brush reduction, exotic species treatment, vegetation seeding or planting, along with fire management, may be required to achieve success and shall be conducted as necessary to ensure that success criteria are maintained in perpetuity. At a minimum, the following activities are required:

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- a. Conducting prescribed burns in accordance w/ attached plan at a frequency and season optimal to promote desirable vegetation and wildlife, with a minimum of one growing season burn every 4 years;
- b. Conducting exotic and nuisance plant control, as necessary, to avoid infestation of these species. At no time shall the cover of these species exceed 5% in any one acre prior to remedial eradication activities;
- c. Quarterly inspection of the property for signs of trespassing, poaching or dumping and to ensure that the structures and security features are in good working order;
- d. Reporting and timely maintenance, restoration, stabilization or repair of any damaged structures, fencing, equipment, roads or erosion areas identified in the quarterly inspection; and
- e. Removing feral/exotic animals that threaten the mitigation activities or success, such as feral hogs.
- f. Prior to final release, the permittee shall prepare a Department-approved, updated, stand-alone management plan for long-term management to be used as enforceable conditions for the long-term manager.

25. Monitoring. Qualitative and quantitative monitoring of vegetation and community structure shall be conducted for the baseline condition and annually thereafter until the bank is determined to have achieved the success criteria in Specific Condition 22. The Department has reviewed the proposed monitoring plan in Attachment I. This plan has been determined to be substantively adequate to evaluate progress toward restoration goals, identify potential roadblocks or impacts that may hamper attaining those goals, provide opportunities for scientific assessment of wetland functions and processes, and ultimately demonstrate that the Bank's success criteria have been met. However, after completing the initial baseline monitoring and reporting, and in consultation with the Department, the permittee shall submit, for the Department's written approval, an updated monitoring plan prior to conducting the next annual monitoring for this permit. This plan shall include the following attributes:

- a. a figure showing all sampling locations;
- b. a table indicating all sampling frequencies and/or dates;
- c. a detailed description of all sampling methodologies to be utilized;
- d. samples of field and data tables;
- e. photographic information.

In addition, this monitoring plan shall include a section detailing the proposed analyses and reporting that will be conducted utilizing the collected data. This section shall include:

- f. proposed reporting format;
- g. sample data summary tables and graphs;
- h. proposed analytical assessments and discussion contents; and
- i. a success/progress assessment.

26. Progress Reports. Beginning the first June or December after permit issuance and every 6 months thereafter, the permittee shall submit semi-annual status reports or letters containing the following information regarding the project:

- a. Date permitted activities were begun or are anticipated to begin;
- b. Brief description and extent of construction or management work completed since the previous report or since the permit was issued;
- c. Copies of permit drawings indicating areas where work has been completed;
- d. A description of problems encountered and solutions undertaken;
- e. A brief description of the work and/or site management the permittee anticipates commencing, continuing or completing in the next six months; and
- f. Site management undertaken, including type of management and dates each type was undertaken.

27. Annual Reports. The Annual Report is a summary of the yearly monitoring for success and an assessment of the degree to which the bank is attaining success. This report shall be submitted after completion of the vegetation monitoring (conducted in October or November) and shall be prepared according to the format required and approved in accordance with Specific Condition 25. This report is due by January 31 and shall be submitted annually until the Bank site has been determined to be successful. The Annual Report included with a request for determination of final success in accordance with Specific Condition 22 shall also include the following information:

- a. a summary of all previous Annual Reports, including, as appropriate, timeline graphics;
- b. a list of each success criterion and documentation of how and when it was attained;
- c. a notation of problems encountered in attaining the success criteria and how the problems were solved, and a notation of any exceptionally successful management activity;
- d. a summary of compliance and/or enforcement submittals or actions during the implementation of the bank; and
- e. a stand-alone, updated long term management plan for approval.

This final report shall be submitted to both the Department and the long-term manager.

28. Compliance: Prior to the initial credit release, the permittee shall prepare a checklist showing all compliance activities required in this permit, and the actual or relative dates for these activities. This checklist, with appropriate items "checked", shall be included with each annual monitoring report submittal and credit release modification request.

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Attachments:

Figures 1-14

Attachment A - Security Plan

Attachment B - Cost Estimate

Attachment C - Target Natural Community Descriptions

Attachment D - Groundcover Restoration

Attachment E - Prescribed Fire Management Plan

Attachment F - UMAM Credit Summary

Attachment G - Mitigation Credit Ledger

Attachment H - Desirable Flatwoods/Prairie Species

Attachment I - Monitoring Plan

January 30 DHS letter

FLEPPC species list

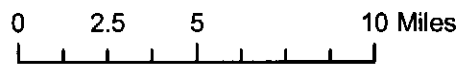
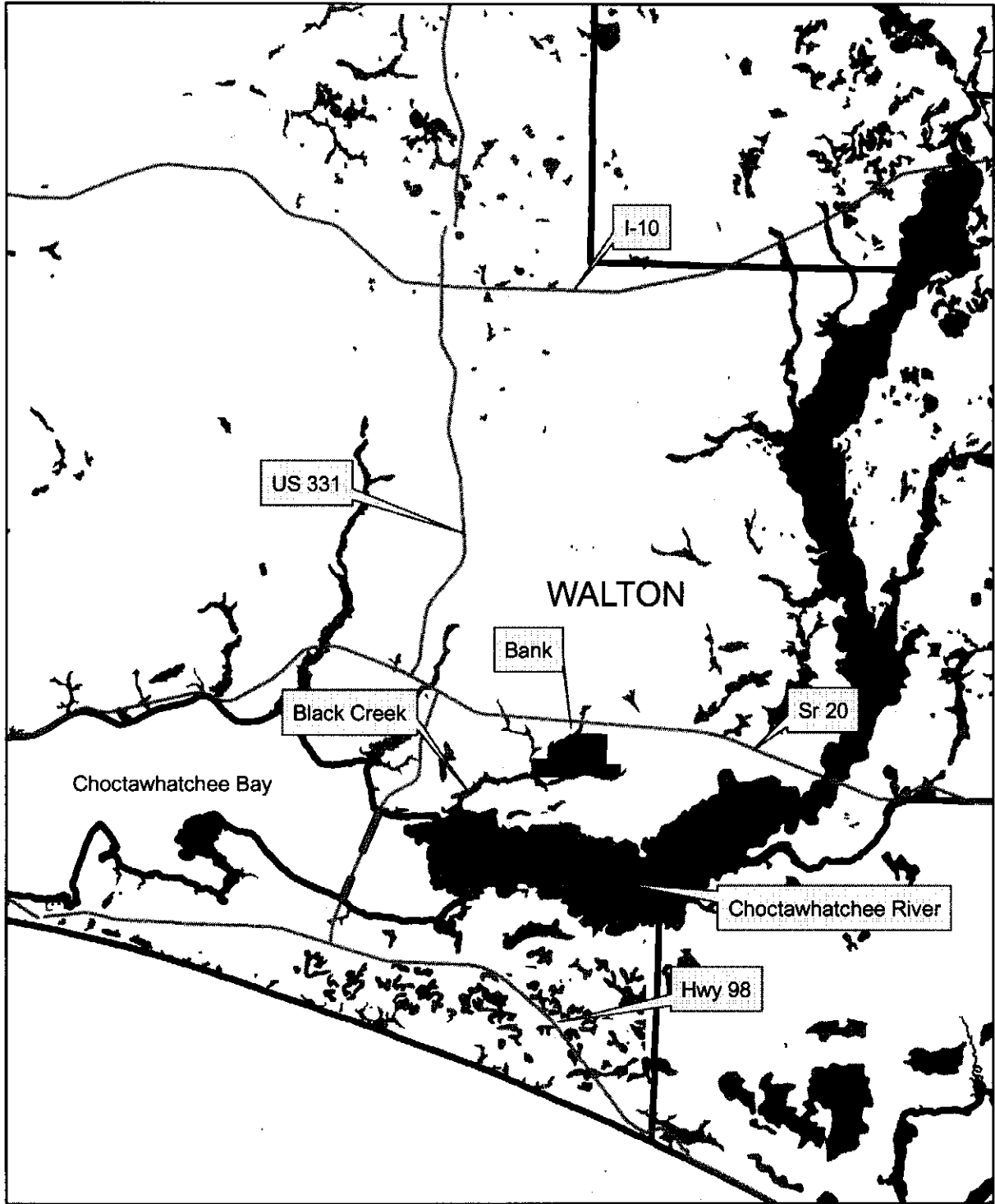
Recommended by:



STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION

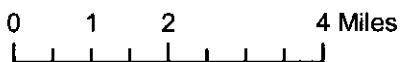
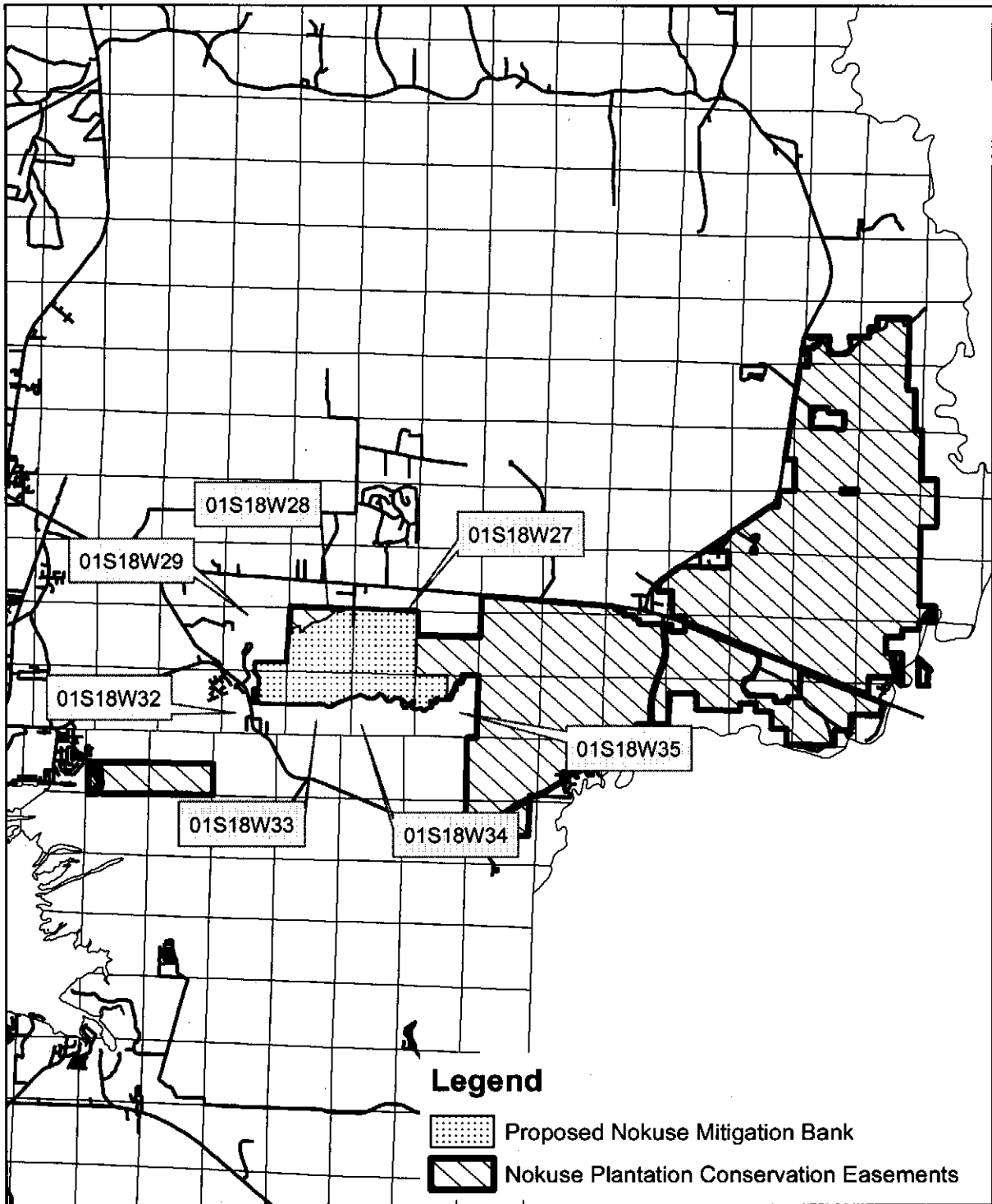


Richard W. Cantrell, Deputy Director
Division of Water Resource Management



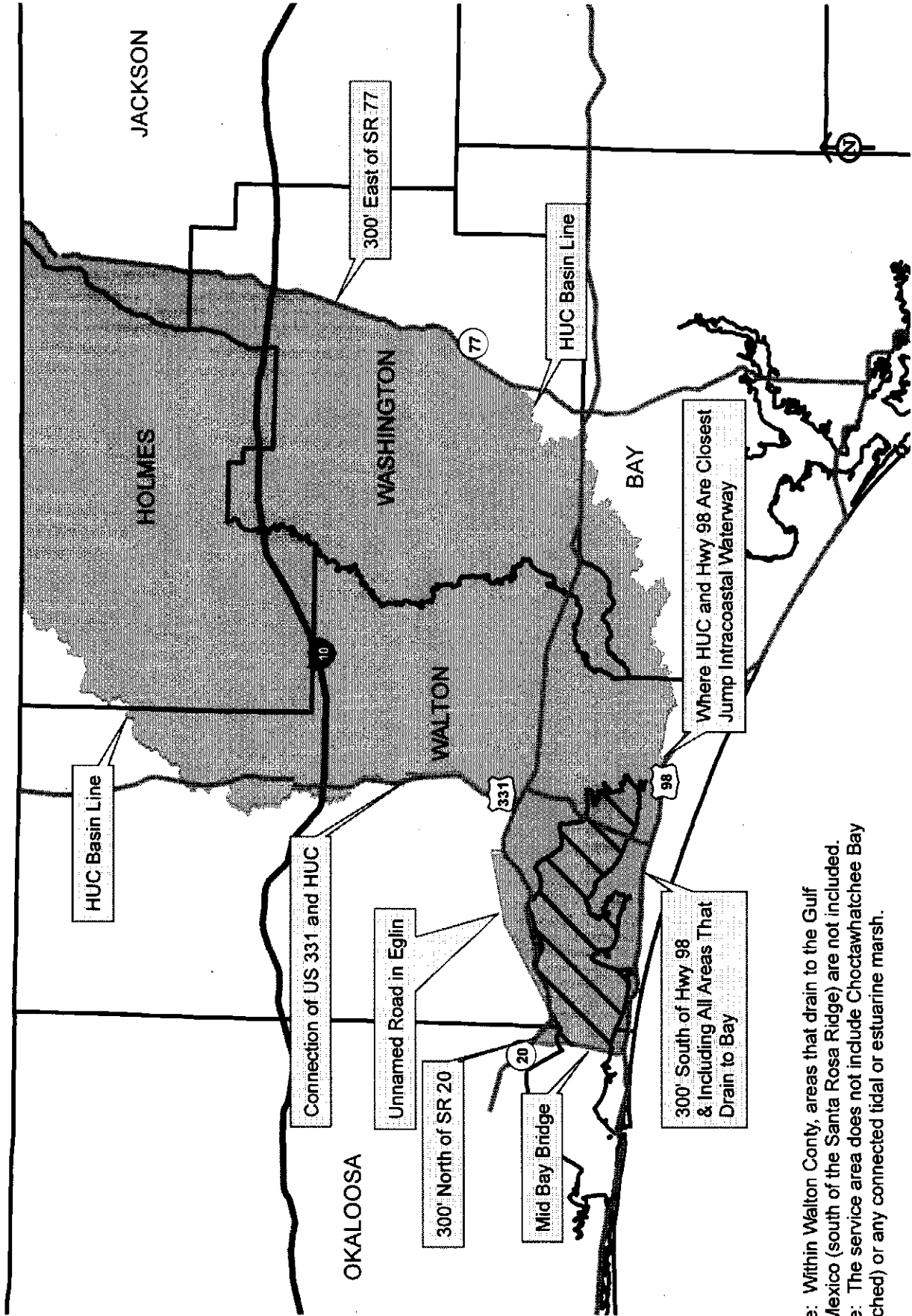
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Figure 1 - Position of Bank in Walton County



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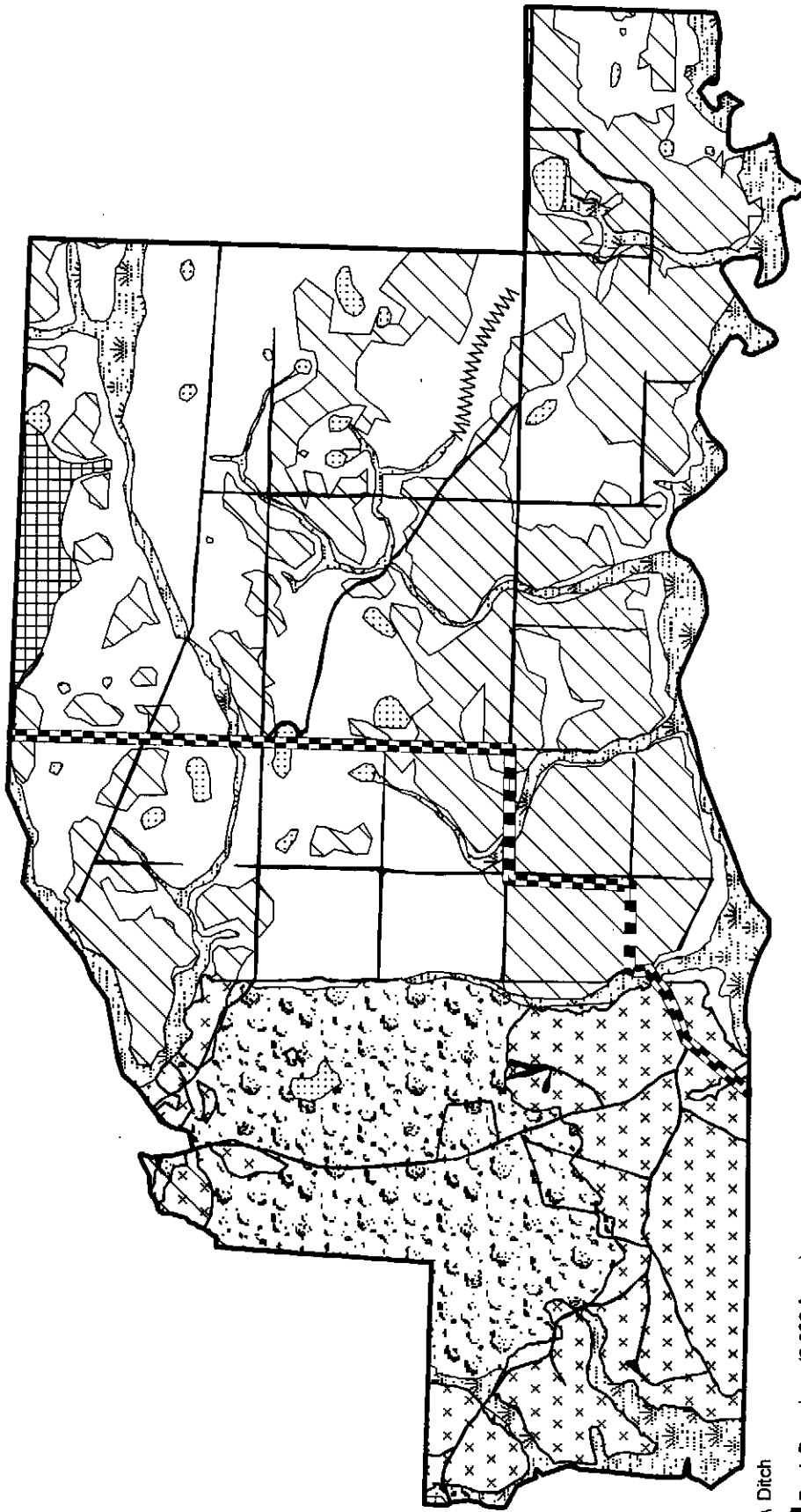
Figure 2 - Bank Location (STR) in Relationship
 to Florida Forever Conservation Easement Purchased by State













Note: Within Walton County, areas that drain to the Gulf of Mexico (south of the Santa Rosa Ridge) are not included.
 Note: The service area does not include Choctawhatchee Bay (hatched) or any connected tidal or estuarine marsh.

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Figure 3 - Mitigation Bank Service Area



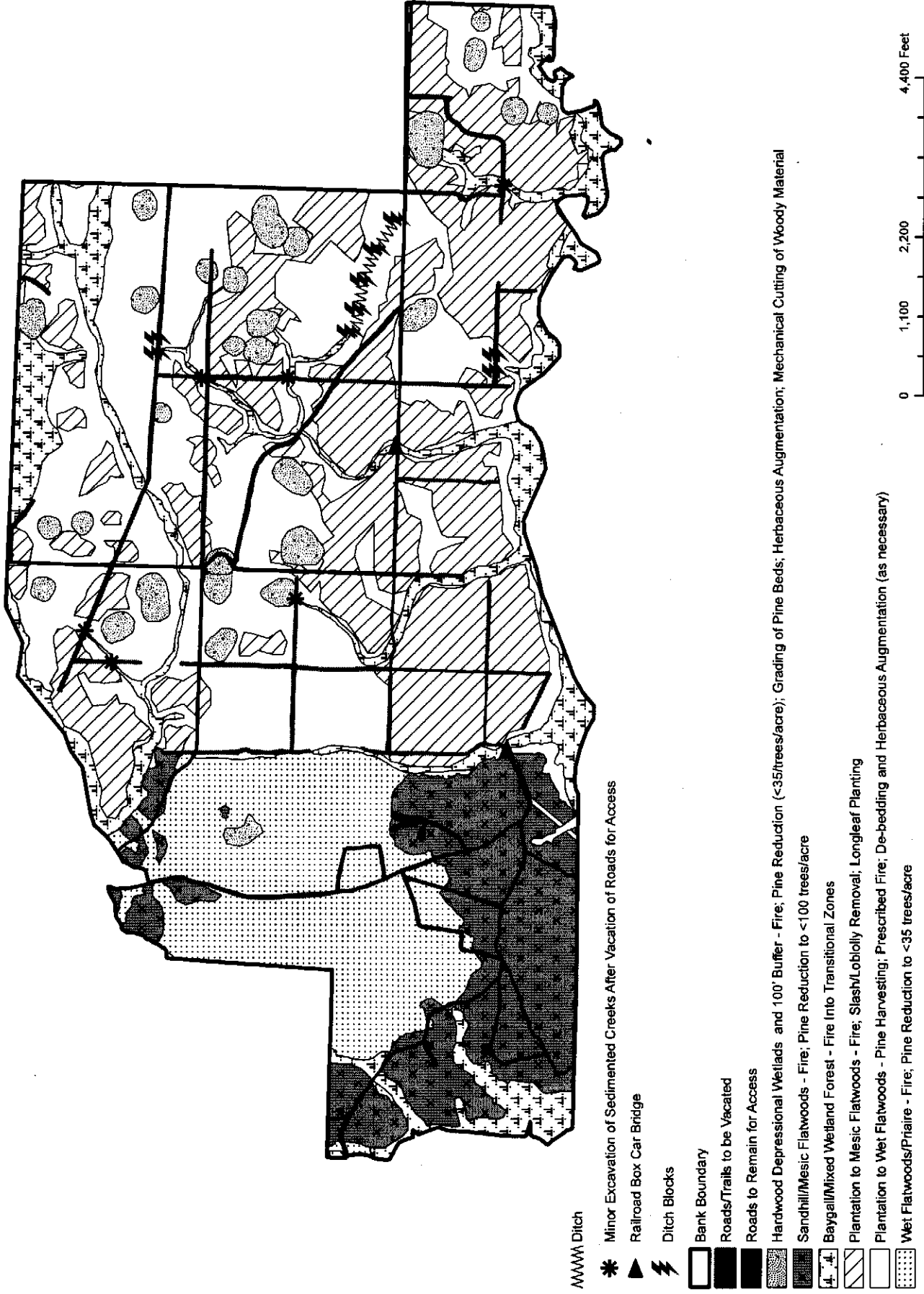
MMMM Ditch

-  Bank Boundary (2,080 Acres)
-  Dedicated Access Easement - FLUCCS 8146
-  Timber Roads/Trails - FLUCCS 8146
-  Upland/Mesic Pine Plantation - FLUCCS 441
-  Sandhill Uplands - FLUCCS 412/Longleaf-Oak
-  Baygall - FLUCCS 611/ Bay Swamps
-  Hardwood Depressional Wetlands- FLUCCS 613/Gum Swamps
-  Mixed Forested Wetlands - FLUCCS 610/Wetland Hardwood Forests
-  Wet Prairie/Wet Flatwoods - FLUCCS 625/Hydric Pine Flatwoods
-  Hydric Pine Plantation - FLUCCS 441

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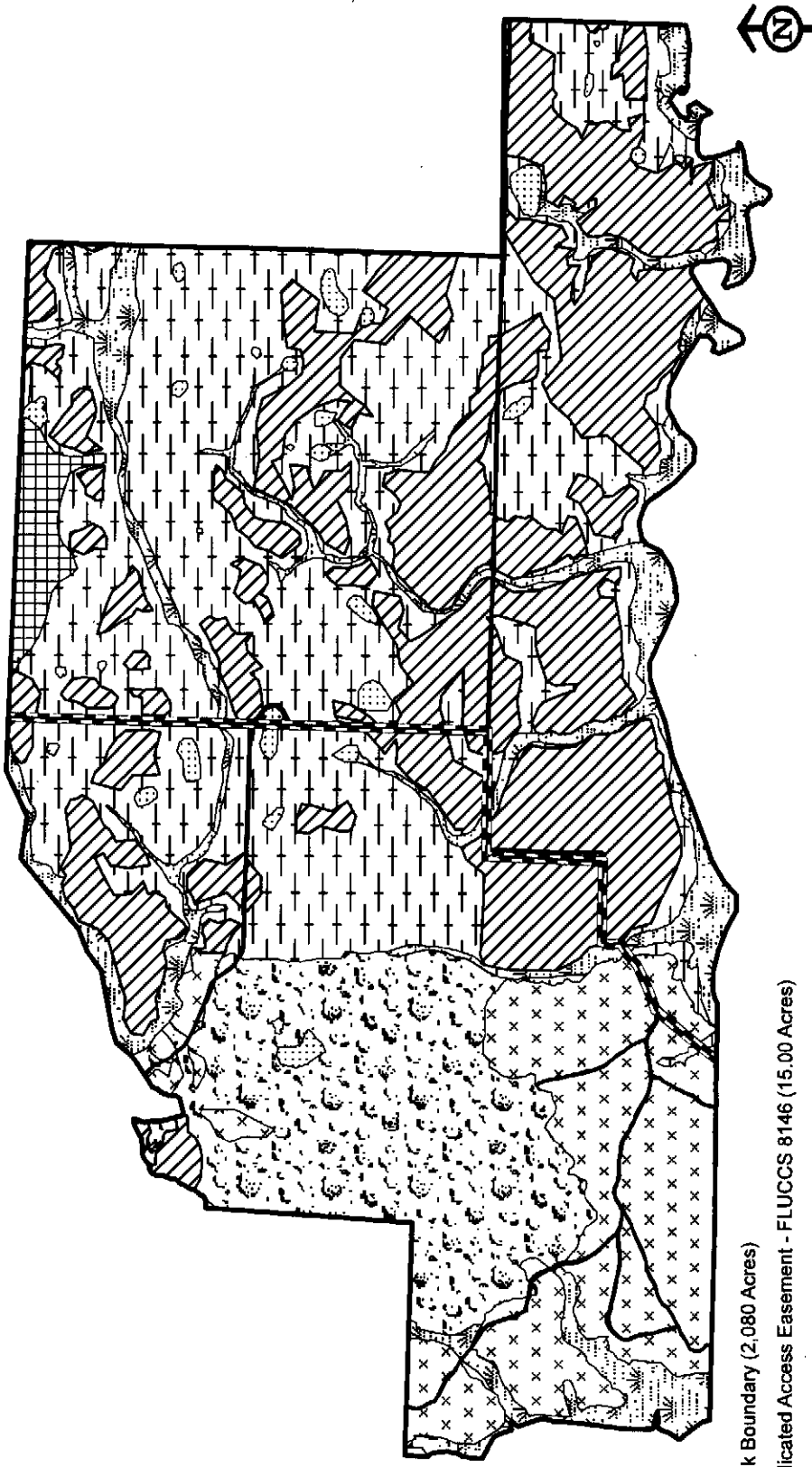
Figure 4 - Existing Communities Described Using FNAI Classification and FLUCCS

0 1,000 2,000 4,000 Feet













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Figure 5 - Proposed Restoration Activities

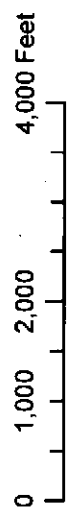


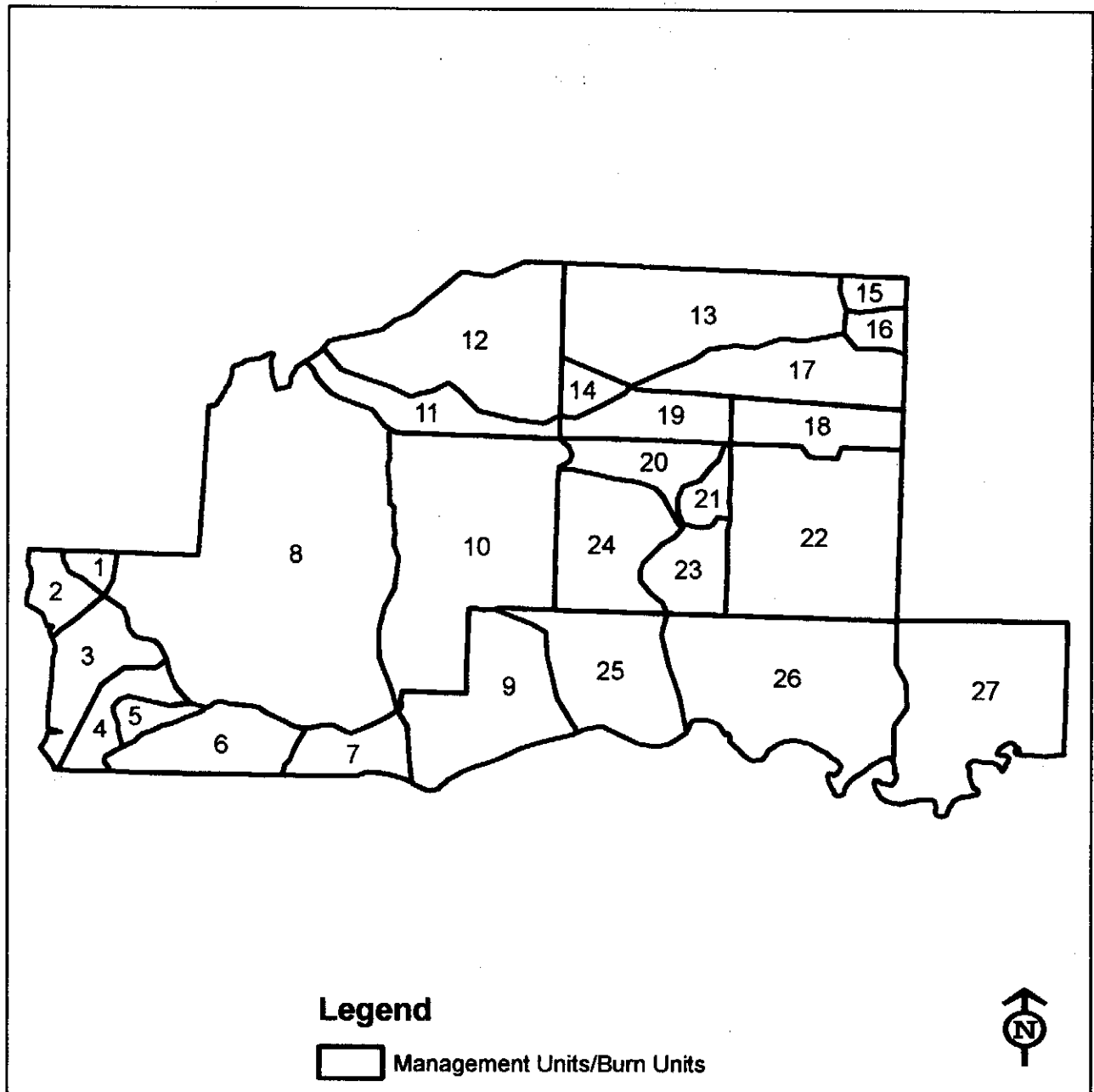
Legend

-  Bank Boundary (2,080 Acres)
-  Dedicated Access Easement - FLUCCS 8146 (15.00 Acres)
-  Timber Roads/Trails - FLUCCS 8146 (16.18 Acres)
-  Mesic Flatwoods (from plantation)/FLUCCS 411/ Upland Pine Plantation to Flatwoods (574.82 Acres)
-  Sandhill Uplands/FLUCCS 412/Upland Flatwoods and Sandhill Enhancement (243.32 Acres)
-  Baygall/ FLUCCS 611/Bay Swamps (27.74 Acres)
-  Hardwood Depressional Wetlands/ FLUCCS 613/Gum Swamps) (26.80 Acres)
-  Mixed Forested Wetlands - FLUCCS 610/Wetland Hardwood Forests (187.72 Acres)
-  Wet Prairie/Wet Flatwoods- FLUCCS 626/Hydric Pine Savanna (277.78 Acres)
-  Wet Flatwoods (from plantation)/ FLUCCS 625/Pine Plantation to Wet Flatwoods and Prairie (710.64 Acres)

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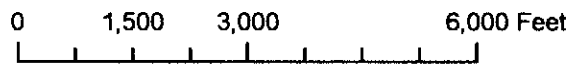
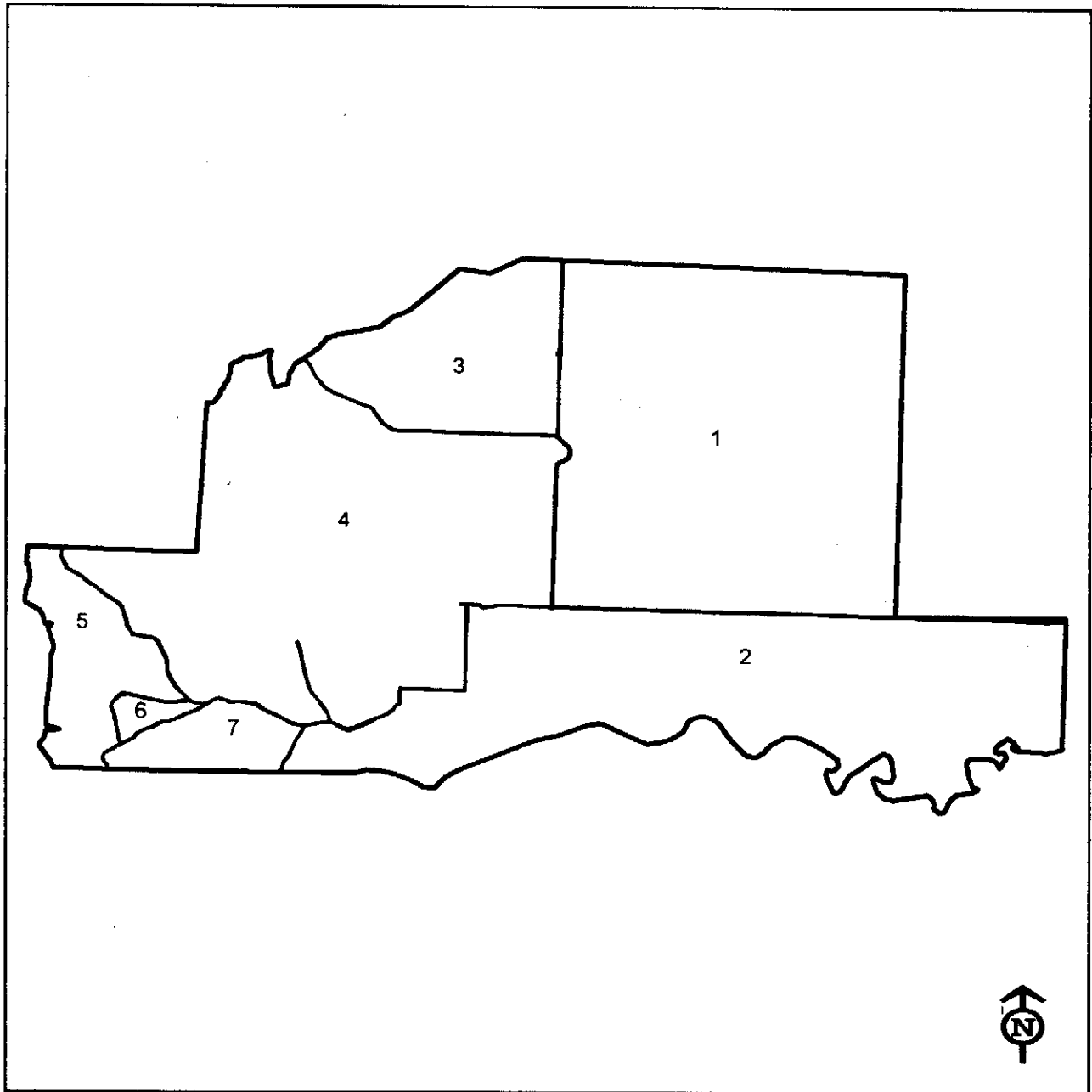
Figure 6 - Proposed Communities After Restoration using FNAI Classification and FLUCCS Codes





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Figure 7 - Initial Mangement Units



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Figure 8 - Long-Term Mangement Units

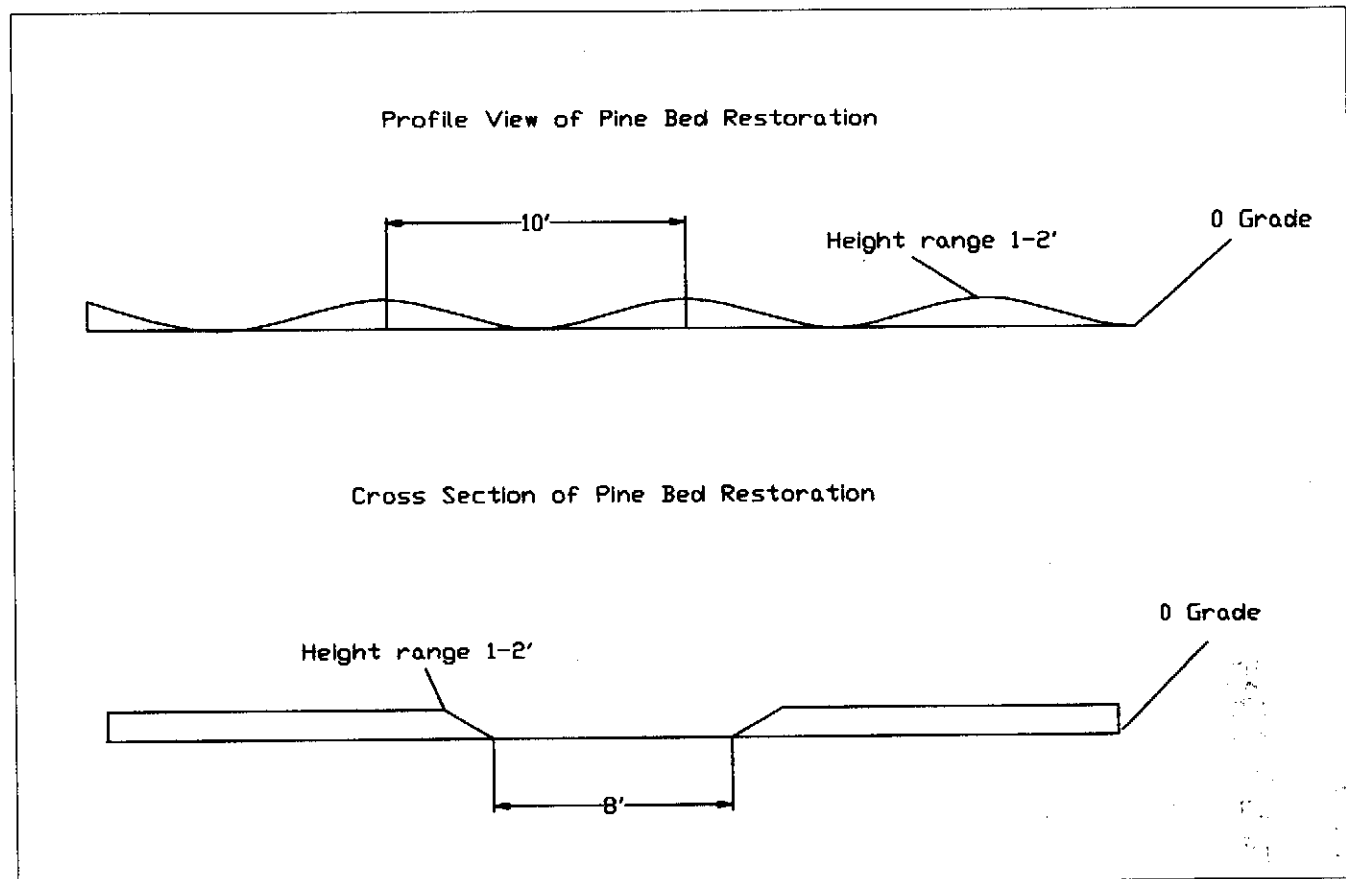
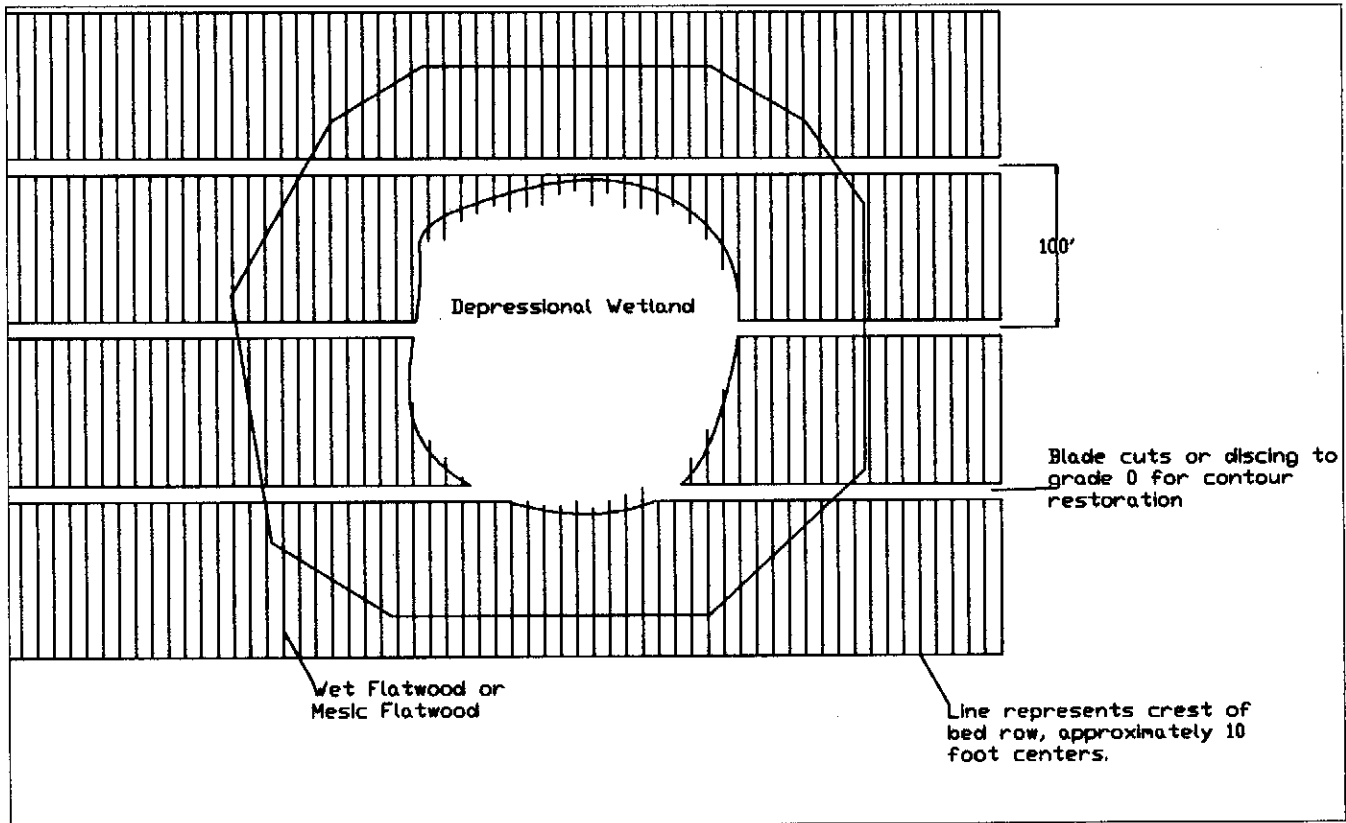
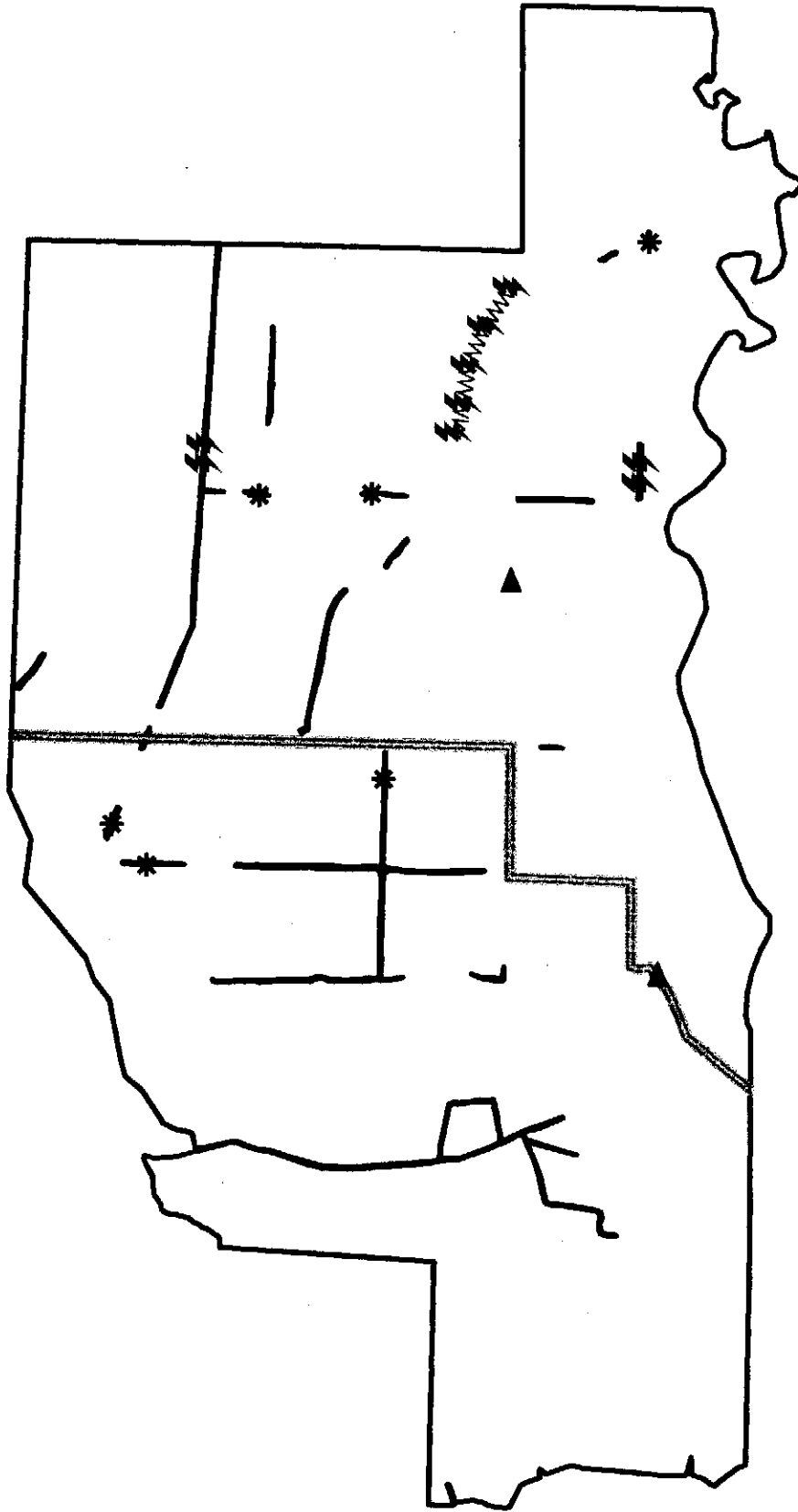


Figure 9 - Typical Pine Bed Restoration N.T.S.



- AAAA Ditch
- * Minor Excavation of Sedimented Creeks/Culvert Removal
- ▲ Railroad Box Car Bridge
- ⚡ Ditch Blocks
- Access Easement
- ▨ Removed/Vacated Wetland Roads
- Bank Boundary

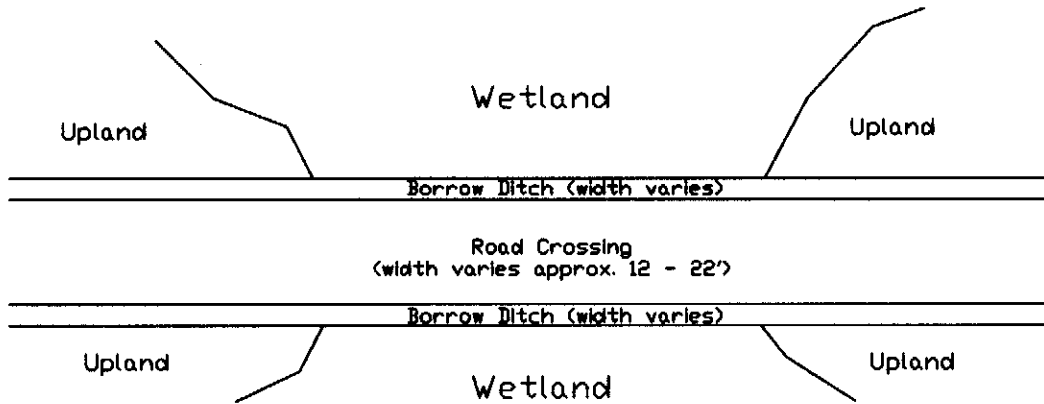


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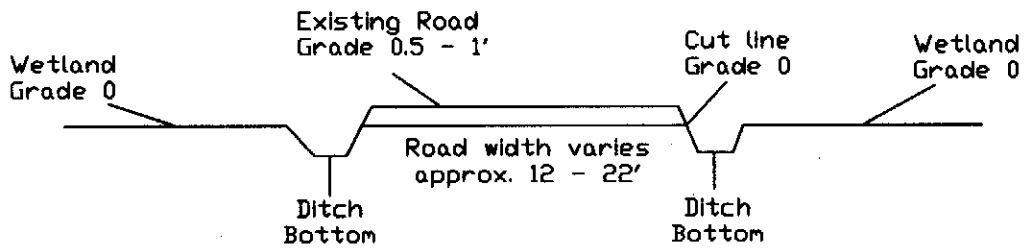
Figure 10 - Hydrologic Enhancement Activities



Existing Conditions - Wetland Road Crossing



Existing Condition - Profile View



Completed Conditions - Profile View

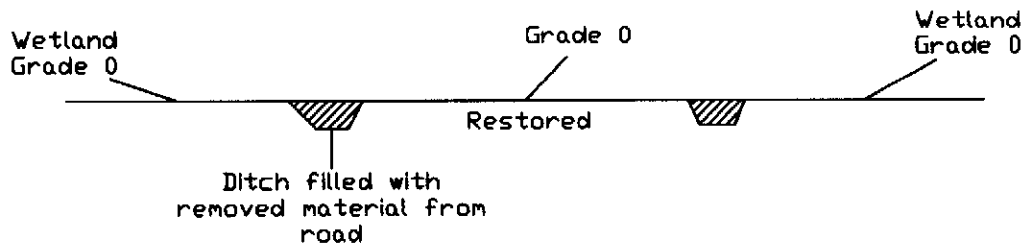
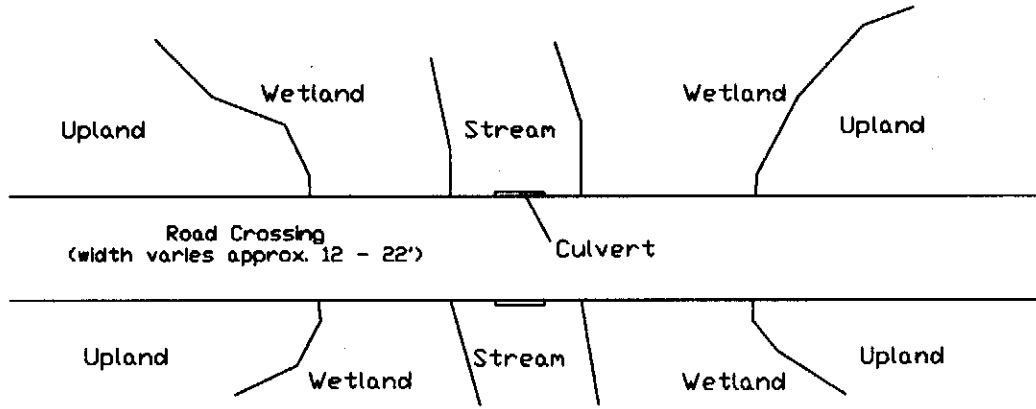


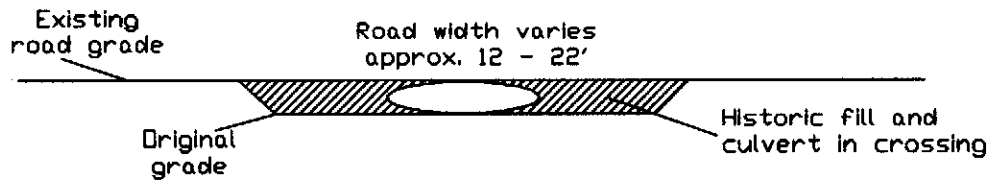
Figure 11 - Typical Road Abandonment

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Existing Conditions - Culverted Wetland Road Crossing



Existing Condition - Profile View



Completed Conditions - Profile View

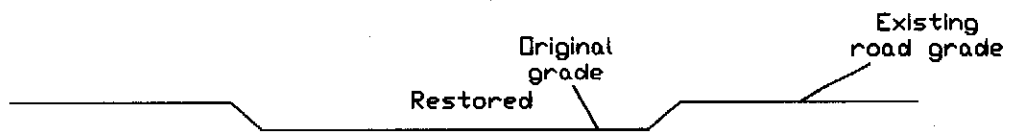
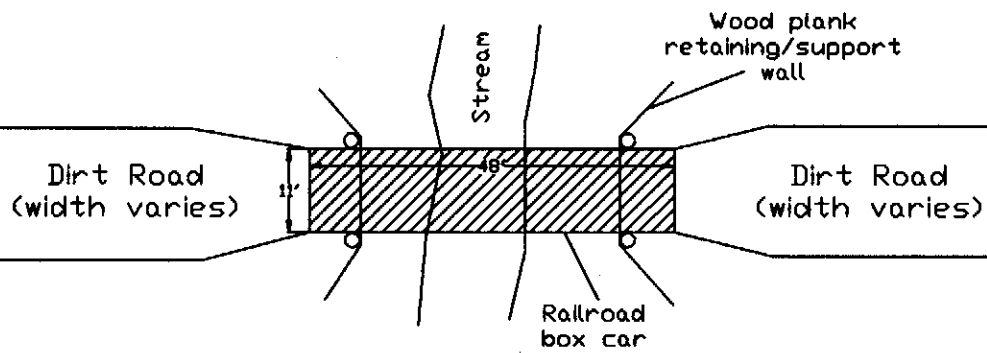


Figure 12 - Typical Wetland/Stream Crossing Restoration (NTS)

Plan View - Boxcar Bridge Crossing



Profile View - Boxcar Bridge Crossing

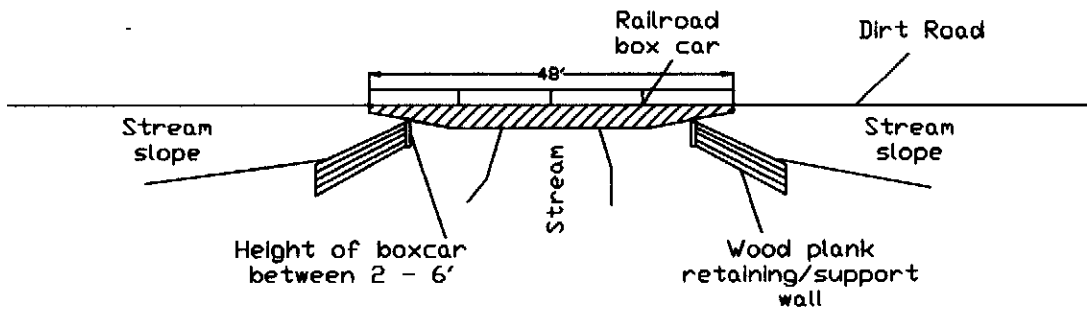


Figure 13 - Typical Box Car Bridge Crossing

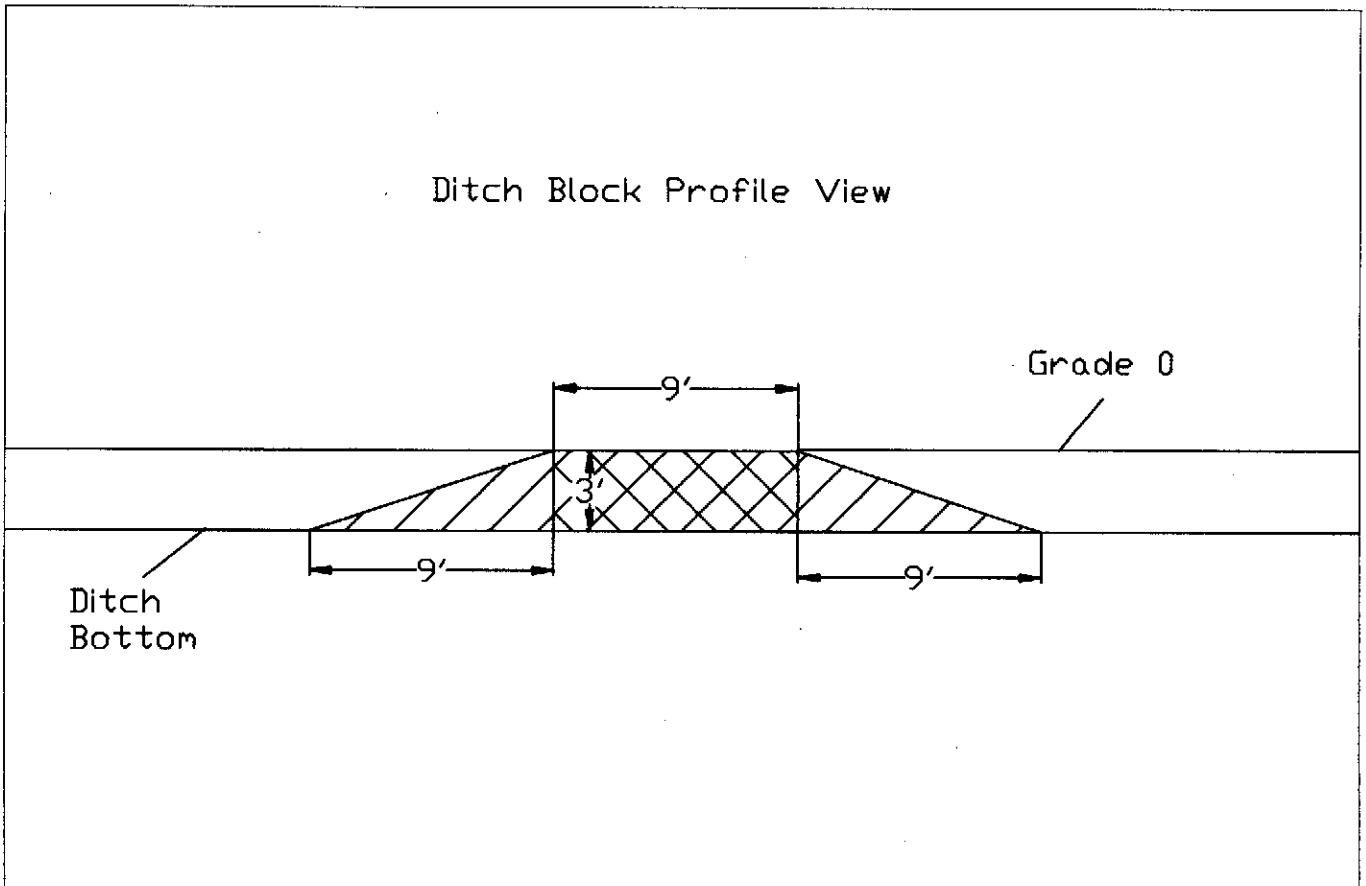
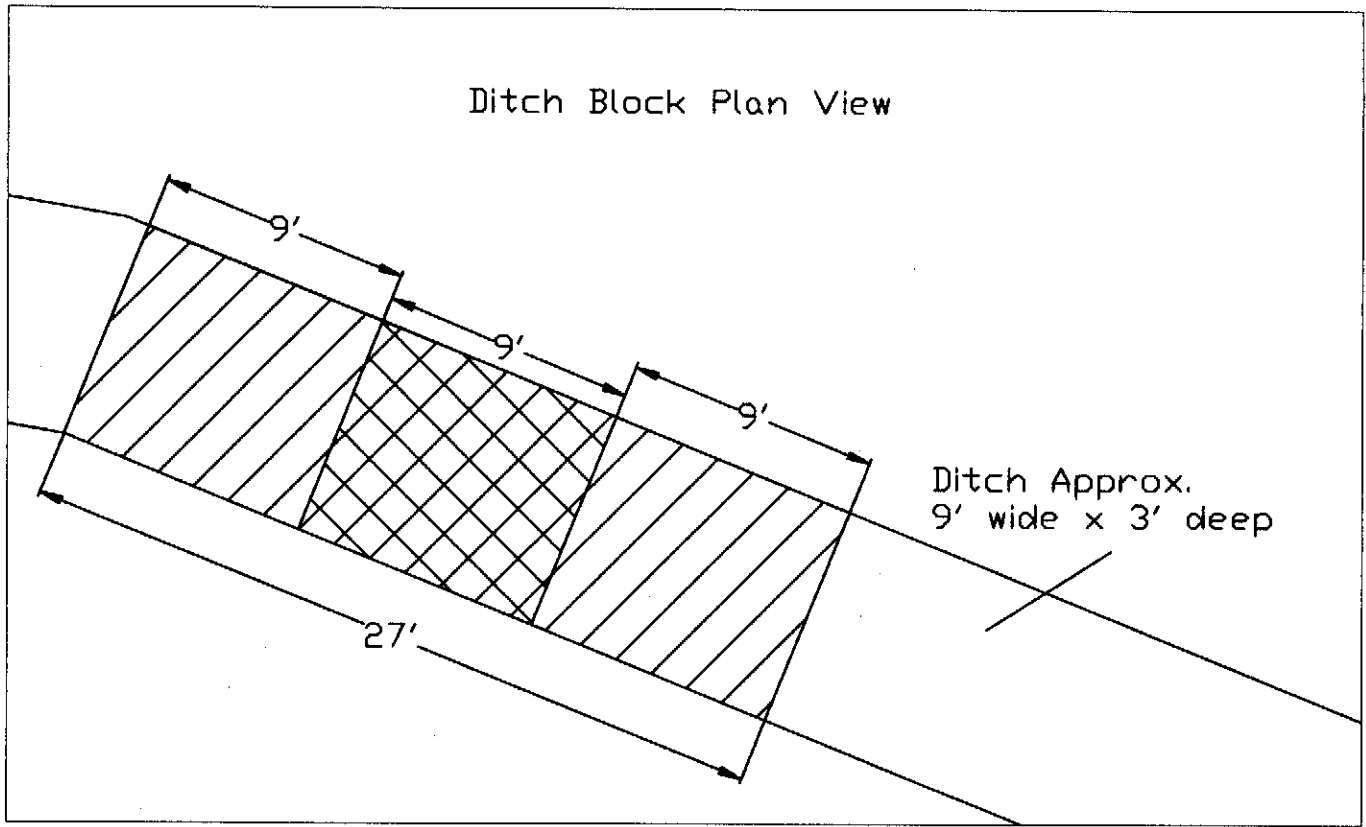


Figure 14 - Typical Ditch Block N.T.S.