

## Appendix A

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# Coastal Zone Management Consistency Evaluation

**FLORIDA COASTAL ZONE MANAGEMENT PROGRAM  
FEDERAL CONSISTENCY EVALUATION PROCEDURES**

**Village of Islamorada Wastewater Improvement Project**

1 Chapter 161, Beach and Shore Preservation.

The intent of the coastal construction permit program established by this chapter is to regulate construction projects located seaward of the line of mean high water and which might have an affect on natural shoreline processes.

Response: The proposed plans and information will be submitted to the state in compliance with this chapter. No work is proposed seaward of the mean high water line in beach areas.

2 Chapters 186 and 187, State and Regional Planning.

These chapters establish the State Comprehensive Plan that sets goals that articulate a strategic vision of the State's future. Its purpose is to define in a broad sense, goals and policies that provide decision-makers directions for the future and provide long-range guidance for an orderly social, economic and physical growth.

Response: The proposed project has been coordinated with various Federal, State, and local agencies during the planning process. The proposed project would achieve the goals of this chapter by contributing to a long-range master plan for South Florida's water resources and supporting the continued orderly social, economic and physical growth of the region.

3 Chapter 252, Disaster Preparation, Response and Mitigation.

This chapter creates a state emergency management agency, with the authority to provide for the common defense; to protect the public peace, health and safety; and to preserve the lives and property of the people of Florida.

Response: The proposed project would not jeopardize the public health, safety, or welfare in the project area. The proposed project would enhance the chapter's goals and would be consistent with the intent of this chapter.

4 Chapter 253, State Lands.

This chapter governs the management of submerged state lands and resources within state lands. This includes archeological and historical resources; water resources; fish and wildlife resources; near shore reefs; beaches and dunes; submerged grass beds and other benthic communities; swamps, marshes and other wetlands; mineral resources; unique natural features; submerged lands; spoil islands; and artificial reefs.

Response: The proposed project would make a positive contribution to preserving cultural, water, fish and wildlife, wetland and estuarine resources, including the Florida Keys National

Marine Sanctuary, which is a unique natural resource. The proposed project would comply with the intent of this chapter.

5 Chapters 253, 259, 260, and 375, Land Acquisition.

This chapter authorizes the state to acquire land to protect environmentally sensitive areas.

Response: These chapters are not applicable to the proposed project. The property for the proposed project is designated for public utilities.

6 Chapter 258, State Parks and Aquatic Preserves.

This chapter authorizes the state to manage state parks and preserves. Consistency with this statute would include consideration of projects that would directly or indirectly adversely impact park property, natural resources, park programs, management or operations.

Response: The *Proposed Action* does not include any activity within a state park or aquatic preserve, but would enhance environmental conditions at state parks or aquatic preserves in the region. The project is consistent with this chapter.

7 Chapter 267, Historic Preservation

This chapter establishes the procedures for implementing the Florida Historic Resources Act responsibilities.

Response: An investigation of historic properties of the proposed WWTF sites included an archival and literature review of the Florida Master Site File records. No archaeological artifacts, features, or sites have been identified on the sites, and no adverse impacts to resources are anticipated. Consultation with SHPO is on-going and will be completed upon purchase of the proposed properties by the Village of Islamorada. If historic or archeological items are found during project work, all activities on the site would be terminated and consultation with the Corps, SHPO, and other appropriate agencies would occur to identify actions necessary to comply with NHPA Section 106 and other applicable requirements. If human remains are discovered, the Florida unmarked human burial law (F.S. Title XLVI 872.05 Unmarked Human Burials) would be implemented.

8 Chapter 288, Economic Development and Tourism

This chapter directs the state to provide guidance and promotion of beneficial development through encouraging economic diversification and promoting tourism.

Response: The proposed project would achieve the goals of this chapter by contributing to a long-range master plan for South Florida's water resources, which would support economic diversification and tourism.

9 Chapters 334 and 339, Public Transportation.

This chapter authorizes the planning and development of a safe balanced and efficient transportation system.

Response: No public transportation systems would be impacted by this project.

10 Chapter 370, Saltwater Living Resources.

This chapter directs the state to preserve, manage and protect the marine, crustacean, shell and anadromous fishery resources in state waters; to protect and enhance the marine and estuarine environment; to regulate fishermen and vessels of the state engaged in the taking of such resources within or without state waters; to issue licenses for the taking and processing products of fisheries; to secure and maintain statistical records of the catch of each such species; and to conduct scientific, economic, and other studies and research.

Response: This project would help improve ecological conditions in the Florida Keys National Marine Sanctuary. Based on the overall impacts of the project, the project is consistent with the goals of this chapter.

11 Chapter 372, Living Land and Freshwater Resources.

This chapter establishes the Game and Freshwater Fish Commission (now called the Florida Fish and Wildlife Conservation Commission) and directs it to manage freshwater aquatic life and wild animal life and their habitat to perpetuate a diversity of species with densities and distributions that provide sustained ecological, recreational, scientific, educational, aesthetic, and economic benefits.

Response: The project will have a long-term positive affect on freshwater aquatic life or wild animal life.

12 Chapter 373, Water Resources.

This chapter provides the authority to regulate the withdrawal, diversion, storage, and consumption of water.

Response: The non-federal sponsor for this project is the Village of Islamorada. The Village of Islamorada has coordinated with the South Florida Water Management District, which is the state agency responsible for implementing this statute, to ensure compatibility with established policies. The project is consistent with the goals of this chapter.

13 Chapter 376, Pollutant Spill Prevention and Control.

This chapter regulates the transfer, storage, and transportation of pollutants and the cleanup of pollutant discharges.

Response: The contract specifications will prohibit the contractor from dumping oil, fuel, or hazardous wastes in the work area and will require that the contractor adopt safe and sanitary measures for the disposal of solid wastes. A spill prevention plan will be required.

14 Chapter 377, Oil and Gas Exploration and Production.

This chapter authorizes the regulation of all phases of exploration, drilling, and production of oil, gas, and other petroleum products.

Response: This project does not involve exploration, drilling, or production of gas, oil or petroleum product and therefore, this chapter does not apply.

15 Chapter 380, Environmental Land and Water Management.

This chapter establishes criteria and procedures to assure that local land development decisions consider the regional impact nature of proposed large-scale development.

Response: The proposed project would achieve the goals of this chapter by contributing to a long-range master plan for South Florida's water resources, which would support the continued orderly social, economic and physical growth of the region.

16 Chapter 388, Arthropod Control.

This chapter provides for a comprehensive approach for abatement or suppression of mosquitoes and other pest arthropods within the state.

Response: The project would not further the propagation of mosquitoes or other pest arthropods.

17 Chapter 403, Environmental Control.

This chapter authorizes the regulation of pollution of the air and waters of the state by the Florida Department of Environmental Regulation (now a part of the Florida Department of Environmental Protection).

Response: An Environmental Assessment addressing project impacts has been prepared and will be reviewed by the appropriate resource agencies including the Florida Department of Environmental Protection. Environmental protection measures will be implemented to ensure that no lasting adverse affects on water quality, air quality, or

other environmental resources will occur. The project complies with the intent of this chapter.

18 Chapter 582, Soil and Water Conservation.

This chapter establishes policy for the conservation of state soil and water through the Department of Agriculture. Land use policies will be evaluated in terms of their tendency to cause or contribute to soil erosion or to conserve, develop, and utilize soil and water resources both onsite or in adjoining properties affected by the project. Particular attention will be given to projects on or near agricultural lands.

Response: Project construction and implementation will include appropriate erosion control plans and measures to ensure compliance with the intent of the chapter. There are no prime farmlands in the project area.

## **Appendix B**

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### **Hazardous Materials and Domestic Waste**

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In August 2005, PBS&J conducted desktop surveys to assess the potential for past or present hazardous materials and waste storage and handling activities on and in the vicinity of the three proposed Village of Islamorada WWTF construction sites. The purpose of these surveys was to identify potential environmental hazards associated with each of the subject properties due to present or past activities at each site and its vicinity. The desktop surveys to assess the potential for past or present hazardous materials and waste storage and handling activities are based on the following information:

- Topographic maps
- Historical aerial photographs
- Site photographs, taken from the perimeter of each site
- Regulatory agency file searches, including federal and state records and lists

It is important to note that a site reconnaissance of these properties has not been conducted at this time. Prior to construction of the proposed WWTFs, a full Phase I Environmental Site Assessment will be performed on the properties.

### **Plantation Key Site**

A hazardous materials and waste storage and handling survey was conducted for the Plantation Key Site, located west of US-1 at MM 89.8 on Plantation Key, Monroe County, Florida. According to the Monroe County Property Appraiser's Office (MCPA), the property is privately owned. The site is heavily vegetated and unimproved. The existing Plantation Key Colony/North Plantation WWTP property is located immediately adjacent to the south-southeast of the subject property. The adjacent property north of the Site is occupied by a residential street, followed by vacant, vegetated land and single family residences. The adjacent property east of this site is occupied by US-1, followed by a parking area, S.R. 4A, and a high school. The property adjacent to the west of this site is occupied by a residential street, followed by vacant, vegetated land and single family residences.

Though no site reconnaissance was conducted, photographs of the site were taken from the periphery of the property. Based on the 2003 aerial photograph and site photographs, the Plantation Key Site is heavily vegetated, unimproved property. No structures, roads, utilities, or issues of concern were observed on this site.

Plantation Key is located in the Keys archipelago, southwest of Tavernier and northeast of Windley Key. The Florida Bay/Gulf of Mexico lies to the north and west of the site and the Atlantic Ocean lies to the south and east. The site is less than one-half mile from both the Atlantic Ocean and the Florida Bay/Gulf of Mexico. In addition, a bay lies approximately 800 feet southwest of the site. According to the Plantation Key (1971) 7.5-Minute Series USGS topographic quadrangle map, the property has a topographic high of approximately five to seven (5-7) feet above mean sea level (MSL) and has little to no relief.

Due to the geology of Plantation Key, like most of the Keys, there is no significant surficial freshwater aquifer. As a result, the main subsurface water flow is the saltwater tidal flushing that occurs between the Florida Bay/Gulf of Mexico side and the Atlantic Ocean side. All potable water for the residence of the Keys is piped in from Homestead on the Florida mainland. There are no designated wellfield protection areas in the Keys. The entire Plantation Key Site is unpaved, allowing for natural percolation of stormwater.

**Regulatory Agency Database Review.** PBS&J retained the services of Environmental Data Resources, Inc., (EDR) an environmental database company, to search applicable regulatory agency lists and standard environmental record sources to identify locations of potential concern. For this desktop survey, record searches were conducted using the America Society for Testing and Materials (ASTM) standard search distances. The subject property did not appear on any of the databases searched. However, the EDR report did identify nine sites within one mile of the subject property: one auto repair facility; one Resource Conservation and Recovery Act (RCRA) small quantity generator facility; two Leaking Underground Storage Tank (LUST) sites; and five Underground Storage Tank (UST) sites.

The auto repair facility (Vics Auto Tech, 90575 Old Highway) is located approximately 850 feet northeast of the subject property and is at a lower elevation than the subject property. According to the EDR report, no violations were reported for this facility. Therefore, this facility should not be considered an environmental concern with regard to the Plantation Key Site.

One of the LUST sites (Plantation Key Professional Building, 88539 Overseas Highway) is located approximately 550 feet south of the subject property and is at a similar elevation. According to the EDR report, this facility had a leaded gasoline discharge in March 1987, followed by required cleanup involving soil removal. Cleanup was completed in December 1993 and the facility received a No Further Action status. Therefore, this facility should not be considered an environmental concern with regard to the Plantation Key Site.

The second LUST site (Monroe County School Board-Coral Shores High School, 89901 Old Highway) is located approximately 800 feet south of the subject property and is at a similar elevation. According to the EDR Report, this facility had a leaded gasoline discharge in April 1992, followed by required cleanup involving contaminated soil. No groundwater contamination was detected. Cleanup was completed in March 1998 and the facility received a No Further Action status. Therefore, this facility should not be considered an environmental concern with regard to the Plantation Key Site.

Based upon the distance (>500 feet) and lack of reported violations, the five UST facilities should not be considered an environmental concern with regard to the subject property.

**Historical Aerial Review.** All available aerial photographs of Section 5, Township 63 South, Range 38 East were obtained from the MCPA Mapping Division. Aerial photographs dated 2003, 2000, 1997, 1994, 1991, 1985, 1981, 1975, 1972, 1968, and 1964 were reviewed. The Plantation Key Site appeared as undeveloped, vegetated land in the 1964 through 2003 aerial photographs. No structures were observed on the site during this period; however, several unpaved paths/roads appeared on the site in the 1972 through 1981 aerials. The 1972

and 1975 aerials showed a cleared roadway through the site apparently used to access the residential area under construction west of the site. The 1981 aerial showed a variety of footpaths through the site.

The adjacent property north of the Plantation Key Site appeared in its current state in the 1972 through 2003 aerial photographs. The 1968 aerial showed cleared land with no buildings north of Woods Avenue, the residential street bordering the site on the north. This area was vegetated, undeveloped land in the 1964 aerial.

The adjacent property east of the Plantation Key Site appeared in its current state in the 1975 through 2003 aerial photographs. In the aerials prior to 1975, the parking area between US-1 and the high school was not present and occupied by vegetation.

The adjacent property south of the Plantation Key Site appeared in its current state in the 1997 through 2003 aerial photographs. This area was occupied by undeveloped, vegetated land in the 1964 through 1994 aerials. Footpaths were observed south of the site in the 1972 and 1981 aerials and an area of cleared land or sand was observed in the 1994 aerial. Homes were visible south of the site in the 1975 through 2003 aerials.

The adjacent property west of the Plantation Key Site appeared in its current state in the 1981 through 2003 aerial photographs. The street and associated residential area layout were under construction in the 1972 and 1975 aerials. This property appeared as undeveloped land and the canal was not yet in place in the 1964 and 1968 aerials.

**Historical Sanborn Map Review.** A review of historical Sanborn fire insurance maps was made available through the services of EDR Sanborn, Inc. The review found no map coverage for the subject property.

**Previous Environmental Reports.** According to the FEMA Final Supplemental EA, dated October 20, 2003, a previous Phase I Environmental Property Assessment was conducted on the existing WWTF property (located immediately adjacent to the south-southeast of the Site) by Nutting Environmental, Inc. in November 2002. The results of this Phase I assessment indicated no evidence of “recognized environmental conditions” in connection with WWTF property.

Based upon a review of available information, including topographic maps, historical aerial photographs, site photographs, regulatory agency file searches, and previous environmental reports, there do not appear to be any environmental concerns associated with the Plantation Key Site.

### **Windley Key Site**

A hazardous materials and waste storage and handling survey was conducted for the Windley Key Site, located between US-1 and Old S.R. 4A, south of MM 85 on Windley Key, Monroe County, Florida. According to the MCPA, the property is privately owned. Though no site reconnaissance was conducted, photographs of the site were taken from the periphery of the property. Based on the 2003 aerial photograph and site photographs,

a one-story building, its associated parking area, and boat and/or vehicle storage are located in the central portion of the Windley Key Site. The eastern portion of the site appears to be grassy vegetation with a billboard and a footpath. Boat and vehicle storage are shown along the southern and western portions of the site. The boat storage was observed on open ground along the southern boundary of the site and a temporary trailer and parked vehicles were observed on open ground along the western portions of the site. The adjacent property north of the site consists of US-1, followed by undeveloped, vegetated land. The intersection of US-1 and Old S.R. 4A lies east of the site. Old S.R. 4A lies south of the site, followed by residential homes and a recreational vehicle park. The property adjacent to the west of the site is vegetated, undeveloped land and the “Theater of the Sea” facility.

Windley Key is located in the Keys archipelago, southwest of Plantation Key and northeast of Upper Matecumbe Key. The Florida Bay/Gulf of Mexico lies to the north of the site and the Atlantic Ocean lies to the south and east. The site is located approximately 450 feet from both the Atlantic Ocean and the Florida Bay/Gulf of Mexico. According to the Plantation Key (1980) 7.5-Minute Series USGS topographic quadrangle map, the property has a topographic high of approximately four to five (4-5) feet above MSL with little relief.

Due to the geology of Windley Key, like most of the Keys, there is no significant surficial freshwater aquifer. As a result, the main subsurface water flow is the saltwater tidal flushing that occurs between the Florida Bay/Gulf of Mexico side and the Atlantic Ocean side. All potable water for the residence of the Keys is piped in from Homestead on the Florida mainland. There are no designated wellfield protection areas in the Keys. At this time, the stormwater management system existing on the property is not known.

**Regulatory Agency Database Review.** PBS&J retained the services of EDR, an environmental database company, to search applicable regulatory agency lists and standard environmental record sources to identify locations of potential concern. For this desktop survey, record searches were conducted using the ASTM standard search distances. The Windley Key Site appeared on the Wastewater Facility Regulation Database (WASTEWATER). The subject property was identified in the EDR report as “Windley Key,” located at 84961 Overseas Highway. This property was listed on the WASTEWATER database as an active, existing permitted facility/site for which effluent, reclaimed water or wastewater residual discharge into the environment and/or monitoring is taking place. No violations were noted in association with this facility. However, the Monroe County Property Appraiser website indicates that the one-story building on subject property houses a business titled Michael’s Maintenance and Appliances Services. This facility was not listed in the EDR report and no other information was available for this facility based on the desktop survey methodology. The EDR report also identified two LUST facilities and one UST facility within one-half mile of the site.

One of the LUST sites (Holiday Isle Marina, MM 84.5 on US-1) is located approximately one-half mile southwest of the subject property at a similar elevation. According to the EDR report, this facility has had three discharges of unleaded gasoline, one in December 1988, one in October 1996, and one in November 2001. No cleanup was required for the December 1988 discharge, cleanup is on-going for the October 1996 discharge, and cleanup is required

and active for the November 2001 discharge. Based on the distance of this facility from the subject property, this facility should not be considered an environmental concern with regard to the Windley Key Site.

The second LUST site (Tropical Reef Resort, 84977 Overseas Highway) is located approximately one-half mile north-northwest of the subject property. This facility is also listed on the UST database. According to the EDR Report, this facility had a diesel gasoline discharge in June 1992 with soil and groundwater contamination reported. The facility is involved in on-going cleanup. Based on the distance of this facility from the subject property, this facility should not be considered an environmental concern with regard to the subject property.

**Historical Aerial Review.** All available aerial photographs of Section 23, Township 63 South, Range 37 East were obtained from the MCPA Mapping Division. Aerial photographs dated 2003, 2000, 1997, 1994, 1991, 1985, 1981, 1975, 1972, 1968, and 1964 were reviewed. The Windley Key Site appeared in its current state in the 2003 aerial photograph. The existing one-story building was observed in the 1964 through 2003 aerials. The paved parking area associated with the building was not observed prior to the 2003 aerial. Prior to the 1985 aerial, the site contained the existing building and low-lying vegetation with no boat, vehicle, or trailer storage on the subject property.

The adjacent property north of the Windley Key Site appeared in its current state, US-1, followed by undeveloped land, in the 1964 through 2003 aerial photographs. The adjacent property east of the site was shown as the intersection of Old S.R. 4A and US-1 in the 1964 through 2003 aerials. The adjacent property south of the site was occupied by Old S.R. 4, followed by residential properties and a recreational vehicle park in the 1964 through 2003 aerials. The adjacent property west of the site appeared in its current state in the 1991 through 2003 aerials. Prior to the 1991 aerial, the Theater of the Sea buildings were not visible.

**Historical Sanborn Map Review.** A review of historical Sanborn fire insurance maps was made available through the services of EDR Sanborn, Inc. The review found no map coverage for the subject property.

Based upon a review of available information, including topographic maps, historical aerial photographs, site photographs, and regulatory agency file searches, environmental concerns have been identified in association with the Windley Key Site. Specifically, the nature of the business currently taking place on the property, Michael's Maintenance and Appliances Service, is unknown and could potentially be cause for environmental concern. This facility was not identified in the EDR report. Additionally, the long-term storage of boats, vehicles, and trailers poses a potential environmental concern. Therefore, prior to construction of the proposed WWTF, a full Phase I Assessment must be performed on the property and potential soil and groundwater testing may be required.

### **Lower Matecumbe Key Site**

A hazardous materials and waste storage and handling survey was conducted for the Lower Matecumbe Key Site, located north of US-1 and north of MM 74 on Lower

Matecumbe Key, Monroe County, Florida. According to the MCPA, the property is privately owned. The Lower Matecumbe Site is comprised of undeveloped, vegetated land. The adjacent property north of the site consists of a residential street, followed by a marina and residential homes. The adjacent property east of the site consists of a residential street, followed by cleared land with vehicle parking and a marina. A real estate building is located adjacent to the southeast of the property. US-1, followed by undeveloped land occupied the property south of the site. The property adjacent to the west of the site is occupied by a gasoline service station and vacant, undeveloped property with vehicle parking and materials storage, followed by a residential street and undeveloped land.

Though no site reconnaissance was conducted, photographs of the site were taken from the periphery of the property. Based on the 2003 aerial photograph and site photographs, the Lower Matecumbe Key Site consists of undeveloped, vegetated land. There are no permanent structures, roads, or utilities on the site. Based on a review of the site photographs, an abandoned shed and boat were observed on the northern portion of the site, a cellular tower is located on the parcel adjacent to the northwest corner of the site, and a small, abandoned boat fueling facility (aboveground storage tank and fuel pump) is located north of site, on the north side of Lake View Drive adjacent to the marina.

Lower Matecumbe Key is located in the Keys archipelago, southwest of Upper Matecumbe Key and northeast of Long Key. The Florida Bay/Gulf of Mexico lies to the north of the site and the Atlantic Ocean lies to the south and east. The site lies approximately 300 feet from the Atlantic Ocean and one-half mile from the Florida Bay/Gulf of Mexico. A marina lies parallel to the site, on the north side of Lake View Drive. According to the Lower Matecumbe Key (1980) 7.5-Minute Series USGS topographic quadrangle map, the property has a topographic high of approximately four to five (4-5) feet above MSL with little relief.

Due to the geology of Lower Matecumbe Key, like most of the Keys, there is no significant surficial freshwater aquifer. As a result, the main subsurface water flow is the saltwater tidal flushing that occurs between the Florida Bay/Gulf of Mexico side and the Atlantic Ocean side. All potable water for the residence of the Keys is piped in from Homestead on the Florida mainland. There are no designated wellfield protection areas in the Keys. The entire site is unpaved, allowing for natural percolation of stormwater.

PBS&J retained the services of EDR to search applicable regulatory agency lists and standard environmental record sources to identify locations of potential concern (using the ASTM standard search distances). The subject property appeared on the Facility Index System/Facility Registry System (FINDS) database. The subject property was identified in the EDR Report as the "Lower Matecumbe Key Stormwater" site, located between MM 74 and MM 75. This property was listed on the FINDS database based on its Permit Compliance System. No other facilities were identified within the search distances.

**Historical Aerial Review.** All available aerial photographs of Section 20, Township 64 South, Range 36 East were obtained from the MCPA Mapping Division. Aerial photographs dated 2003, 2000, 1997, 1994, 1991, 1985, 1981, 1975, 1972, 1968, and 1964 were reviewed. The Lower Matecumbe Key Site appeared as undeveloped, vegetated (at times partially cleared) land in the 1964 through 2003 aerial photographs. The 1994 aerial photograph showed a structure in the southeastern portion of the site, which could have been either a small building or a shipping container. The 1968 aerial photograph showed some type of structure in the northern portion of the site, which again could have been a small building or a shipping container.

The adjacent property north of the Lower Matecumbe Key Site appeared in its current state in the 1968 through 2003 aerial photographs. The 1964 aerial showed the residential street and marina north of the site under construction.

In the 2003 aerial photograph, the adjacent property east of the Lower Matecumbe Key Site was occupied by a residential street, followed by a marina and a vacant lot with vehicle parking. In the 2000 aerial, no vehicles were parked in this vacant lot. In the 1968 through 1997 aerials, the marina is visible and the lot east of the residential street is either vegetated or partially cleared. The 1964 aerial showed the residential street and marina east of the site under construction and the adjacent lot is vegetated and undeveloped.

The adjacent property south of the Lower Matecumbe Key Site appeared in its current state (real estate building located adjacent to the southeast of the Site and US-1 located south of the Site) in the 1975 through 2003 aerial photographs. In the 1968 and 1972 aerials, a small building is visible just west of the real estate building. In the 1964 aerial, the real estate building has not been constructed and the area south of the Site is cleared with some low-lying vegetation.

The adjacent property west of the Lower Matecumbe Key Site appeared in its current state (gas station buildings and a vacant property with vehicle parking) in the 2000 and 2003 aerial photographs. In the 1991 through 1997 aerials, the current gas station buildings are not visible, and there are several smaller structures in this adjacent property. One of these structures may be a gasoline station awning. The 1985 aerials depict one larger building and two smaller structures on this adjacent site, while the 1964 through 1981 aerials depict only the larger building.

**Historical Sanborn Map Review.** A review of historical Sanborn fire insurance maps was made available through the services of EDR Sanborn, Inc. The review found no map coverage for the subject property.

Based upon a review of available information, including topographic maps, historical aerial photographs, site photographs, and the regulatory agency file searches, environmental concerns have been identified in association with the Lower Matecumbe Key Site. Specifically, the gasoline station located on the property adjacent to the west of the site presents a potential for the presence of groundwater contamination. This gasoline

station did not appear in the regulatory agency database search. In addition, there is an abandoned boat fueling facility located north of the subject property, adjacent to the marina. Therefore, prior to construction of the proposed WWTF, a complete Phase I Environmental Site Assessment must be performed on the property and potential groundwater testing may be required.