

BEFORE THE STATE OF FLORIDA
DIVISION OF ADMINISTRATIVE HEARINGS

PINNACLE RIO, LLC, DOAH Case Nos: 14-1398BID
14-1399BID
14-1400BID
Petitioner, 14-1425BID
14-1426BID
-vs- 14-1427BID
14-1428BID

FLORIDA HOUSING FINANCE
CORPORATION,

Respondent,

and

ALLAPATTAH TRACE APARTMENTS, LTD.,

Intervenor.

*****/*****

DEPOSITION OF: DOUGLAS PILE
DATE TAKEN: APRIL 18, 2014
TIME: 9:04 A.M. - 10:21 A.M.
PLACE: 3575 SOUTH LEJEUNE ROAD
MIAMI, FLORIDA 33233

REPORTED BY: JAZZMIN ALICEA, FPR
AND NOTARY PUBLIC

INDEX

1
2 TESTIMONY OF DOUGLAS PILE
3 Direct Examination By Mr. Glazer 4
4 Cross-Examination By Mr. Donaldson 19
5 Redirect Examination By Mr. Glazer 57
6 CERTIFICATE OF REPORTER 62
7 CERTIFICATE OF OATH 63
8 ERRATA SHEET 64
9 READ AND SIGN LETTER 65

EXHIBITS

10 Exhibit 1..... 7
11 Letter
12 Exhibit 2.....11
13 Letter
14 Exhibit 3.....11
15 Letter
16 Exhibit 4.....11
17 Letter
18 Exhibit 5.....14
19 Letter
20 Exhibit 6.....15
21 Letter
22 Exhibit 7.....24
23 FL Housing Verification
24 Exhibit 8.....31
25 Google Map
26 Exhibit 9.....37
27 Letter

STIPULATIONS

It is hereby agreed and so stipulated by and
between the parties hereto, through their respective
Counsel, that the reading and signing of the transcript
is expressly reserved by the deponent.

APPEARANCES:

1 Appearing on Behalf of Allapattah Trace Apartments:
2 MICHAEL J. GLAZER, ESQUIRE
3 Ausley McMullen
4 123 South Calhoun Street
5 PO Box 391 (32302)
6 Tallahassee, Florida 32301
7 MGlazer@ausley.com

8 Appearing on Behalf of Florida Housing:
9 HUGH R. BROWN, ESQUIRE (via telephone)
10 Florida Housing Finance Corporation
11 227 North Bronough Street
12 Suite 500
13 Tallahassee, Florida 32301
14 Hugh.Brown@floridahousing.org

15 Appearing on Behalf of Related Group:
16 MICHAEL P. DONALDSON, ESQUIRE (via telephone)
17 Carlton Fields Jordan Burt, P.A.
18 PO Box 190
19 Tallahassee, Florida 32302
20 MDonaldson@cfjblaw.com

PROCEEDINGS

THEREUPON:

DOUGLAS PILE,

having been first duly sworn to tell the truth, was
examined, and testified upon his oath as follows:

THE WITNESS: I do.

DIRECT EXAMINATION

BY MR. GLAZER:

Q. Good morning. Please state your name for the record.

A. My name is Douglas Pile. My address is 3575 South Lejeune Road in Miami, Florida 33146.

Q. Mr. Pile, my name is Michael Glazer; I am with the Ausley McMullen Law Firm in Tallahassee. I represent the Richman Group of Florida, and in particular, an applicant called the Allapattah Trace Apartments. I'll be ask you some questions this morning.

As you know, we've got several folks on the phone, so I'll try not to speak over you and ask you not to speak over me, and then if anybody from the phone pipes in, let's make sure we try to keep our record clear for our court reporter.

A. Okay.

Q. By whom are employed, Mr. Pile?

<p style="text-align: right;">Page 5</p> <p>1 A. Sorry?</p> <p>2 Q. By whom are you employed?</p> <p>3 A. I am employed by Miami-Dade County Water and</p> <p>4 Sewer Department.</p> <p>5 Q. And what is the business of Miami-Dade County</p> <p>6 Water and Sewer Department?</p> <p>7 A. We provide domestic potable water to retail and</p> <p>8 wholesale customers. We also take care of processing</p> <p>9 and treating the sewage for retail and wholesale</p> <p>10 customers.</p> <p>11 Q. In what geographic area?</p> <p>12 A. In Miami-Dade County.</p> <p>13 Q. And what is your title?</p> <p>14 A. New business contract officer.</p> <p>15 Q. And what are your duties and responsibilities in</p> <p>16 that position?</p> <p>17 A. I draft developer agreements with developers who</p> <p>18 need to install water and sewer facilities that are</p> <p>19 donated to the water and sewer department. I also write</p> <p>20 letters of availability for developers who are thinking</p> <p>21 of developing property. I also write service area</p> <p>22 agreements between different municipal utilities, if</p> <p>23 we're -- if they cannot serve an area and we can, you</p> <p>24 know, we will trade areas. And other various documents</p> <p>25 that are attached to these agreements, such as</p>	<p style="text-align: right;">Page 7</p> <p>1 A. Yes.</p> <p>2 Q. All right. And does that typically deal with</p> <p>3 availability of water and sewer?</p> <p>4 A. It typically deals with the -- they come us for</p> <p>5 letters of availability for water and sewer for their</p> <p>6 proposed developments.</p> <p>7 MR. GLAZER: I am going to ask our court</p> <p>8 reporter, now, to mark as our Deposition Exhibit 1 a</p> <p>9 letter dated November 12, 2013, addressed to the</p> <p>10 Richman Group of Florida.</p> <p>11 And I believe everybody on the phone should</p> <p>12 have a copy.</p> <p>13 (Whereupon, Exhibit 1 was marked for</p> <p>14 identification.)</p> <p>15 BY MR. GLAZER:</p> <p>16 Q. Mr. Pile, are you familiar with that?</p> <p>17 A. Yes, I am.</p> <p>18 Q. And is that, in fact, the letter of availability,</p> <p>19 like you were just referencing?</p> <p>20 A. Yes, this is.</p> <p>21 Q. Okay. And is that your signature on the letter?</p> <p>22 A. Yes, it is.</p> <p>23 Q. And how did you come to write this letter?</p> <p>24 A. Typically, the letters of availability -- an</p> <p>25 application by the -- by the developer. And it will</p>
<p style="text-align: right;">Page 6</p> <p>1 covenants, unities of title, and releases of same.</p> <p>2 Q. How long have you been in this position?</p> <p>3 A. Three years.</p> <p>4 Q. How long have you been with Miami-Dade County</p> <p>5 Water and Sewer, in total?</p> <p>6 A. Six years.</p> <p>7 Q. And are you a lawyer, by training?</p> <p>8 A. Yes, I am.</p> <p>9 Q. Mr. Pile, if a developer is going to develop an</p> <p>10 apartment complex in Miami-Dade County in a location</p> <p>11 that's served by Miami-Dade Water and Sewer, what is</p> <p>12 your role in the process that the developer would follow</p> <p>13 to gain approval for sewer services?</p> <p>14 A. If they come to us initially for a letter of</p> <p>15 availability, I would draft that letter. If they came</p> <p>16 to us for an agreement to develop a parcel of land that</p> <p>17 needed water and sewer facilities, I would also draft</p> <p>18 that agreement.</p> <p>19 Q. Now, are you generally familiar with Florida</p> <p>20 Housing Finance Corporation?</p> <p>21 A. I am familiar with the organization, yes.</p> <p>22 Q. Okay. And are you periodically approached by</p> <p>23 developers involved with submitting applications to</p> <p>24 Florida Housing seeking information about projects that</p> <p>25 they are proposing?</p>	<p style="text-align: right;">Page 8</p> <p>1 come to us, and then will be referred to an engineer to</p> <p>2 determine the points of connection. And after that is</p> <p>3 determined, it comes to me to write the letter of</p> <p>4 availability, based upon the -- the project that is</p> <p>5 going to be developed, and the required points of</p> <p>6 connection as determined by the engineer.</p> <p>7 Q. And are you familiar with the location of the</p> <p>8 properties that are identified on our Exhibit 1?</p> <p>9 A. Yes, I am.</p> <p>10 Q. And is it located in Miami-Dade County?</p> <p>11 A. Yes, it is.</p> <p>12 Q. And is it a location that is served by Miami-Dade</p> <p>13 Water and Sewer?</p> <p>14 A. Yes, it is.</p> <p>15 Q. And was Exhibit 1 accurate on November 12, 2013?</p> <p>16 A. Yes, it was.</p> <p>17 Q. Okay. Is it still accurate today?</p> <p>18 A. Yes, it is.</p> <p>19 Q. I would like to focus on the third paragraph</p> <p>20 regarding the county sewage pumping station.</p> <p>21 Why is the pump station, referenced in this</p> <p>22 paragraph, relevant to the properties that are</p> <p>23 identified in this letter?</p> <p>24 A. Pump Station 54 is the receiving pump station for</p> <p>25 the gravity sewer system that is abutting the proposed</p>

<p style="text-align: right;">Page 9</p> <p>1 development for Allapattah Trace. So the property's 2 sewer would flow into the abutting eight-inch gravity, 3 and then flow downhill, eventually to get to Pump 4 Station 54. 54 is currently in conditional moratorium, 5 at the time it was in, what we call, initial moratorium. 6 Q. What do those terms mean? 7 A. Initial moratorium is a status, after we have 8 submitted a remedial action plan, to address the -- the 9 moratorium issue. A moratorium is essentially when a 10 pump station exceeds its operating time. Pump stations 11 are rated based upon -- well, each individual pump has a 12 certain rating, and how many hours it is allowed to 13 operate at any one time. If it exceeds that hourly rate 14 in a 24-hour cycle, then it goes into moratorium. 15 Initial moratorium, when we notice that it gets 16 beyond a certain number of hours. And then conditional 17 moratorium, when we submit an action plan to DERM, the 18 regulatory agency. 19 Q. Okay. Why don't you give her what that acronym 20 is, for our court reporter. 21 A. Okay. DERM is Department of Environment Resource 22 Management. 23 Q. Okay. Despite that moratorium on November 12, 24 2013, was sewer service available to this site, 25 identified in Exhibit 1, for an apartment complex of</p>	<p style="text-align: right;">Page 11</p> <p>1 and this is the version marked as Site 2. 2 (Whereupon, Exhibits 2 and 3 were marked for 3 identification.) 4 BY MR. GLAZER: 5 Q. Mr. Pile, are you familiar with the Exhibits 2 6 and 3? 7 A. Yes, I am. 8 Q. And what are those letters? 9 A. These are also letters of availability for a 10 developer that is seeking to develop housing. But these 11 are in areas outside of our water and sewer service 12 area. 13 Q. And are you familiar with the actual locations 14 identified in these letters? 15 A. Yes. They are in the city of Opa-Locka. 16 MR. GLAZER: I am next going to mark as our 17 Deposition Exhibit 4, a letter dated October 21, 18 2013. It's addressed to Club Mariner Related, LLC. 19 (Whereupon, Exhibit 4 was marked for 20 identification.) 21 BY MR. GLAZER: 22 Q. Do you recognize our Exhibit 4? 23 A. Yes, I do. 24 Q. And what is that? 25 A. That is another letter of availability for a</p>
<p style="text-align: right;">Page 10</p> <p>1 approximately 80 units? 2 A. Yes, it was. 3 Q. And how would that be accomplished? 4 A. Any time a project is abutting a gravity sewer 5 that is in moratorium -- well, with the downstream pump 6 stations in moratorium, we give the developer the option 7 to install a private pump station that would pump the 8 sanitary sewage into a force main that would attach to a 9 Water and Sewer Department force main. And that force 10 main takes the sewage directly to our sewage treatment 11 center, bypassing the gravity sewer system, bypassing 12 the pump station that would be in moratorium. 13 Q. And would that option had been available to the 14 Allapattah Trace project in 2013? 15 A. Yes, it was. 16 MR. GLAZER: I am going to turn our attention 17 to our next exhibit. And I am actually going to mark 18 two of them at the same time. 19 The first one, which we'll mark as our 20 Deposition Exhibit 2, is an October 21, 2013 letter 21 to Town Center Phase Two, LLC. And for the benefit 22 of everyone on the phone, this is the letter that, in 23 "Re:" references Site 1. 24 And I'm also going to ask her to mark an 25 October 21, 2013, letter from Town Center Phase Two,</p>	<p style="text-align: right;">Page 12</p> <p>1 project in the southern part of Miami-Dade County. 2 Q. And are you familiar with the locations 3 identified on that letter? 4 A. Yes, I am. 5 Q. The letter indicates that a private pumping 6 station is needed for that project; why is that the 7 case? 8 A. The engineers looked at the project and its 9 location, with respect to abutting our nearby gravity 10 and force main for sewer capability. That particular 11 project was abutting, I think, a 20-inch sewer force 12 main. And that seemed to be the best point of 13 connection for that development, due to the size of the 14 project, which was 76 apartments. 15 I did discuss with the engineers why they could 16 not have -- why the developer did not have the option of 17 connecting to a gravity sewer system, which was further 18 down one of the roads. And the engineers suggested, 19 given the depth and the distance, it was not 20 economically feasible. At least not economically 21 preferable for the developer to install a gravity sewer 22 line from its project down the street to a very deep 23 manhole. 24 It would have been much faster and cheaper to 25 install a private pump station to service the property</p>

Page 13

1 and it's connect to an abutting force main.
 2 **Q. And is that a circumstances that you've run into**
 3 **in your experience in the past?**
 4 A. Oh, yeah. I mean, every project is unique, and
 5 the layout of the water and sewer facilities that are in
 6 the area are also unique. And, you know, the engineers
 7 look at the whole situation and see which is the -- the
 8 proper point of connection, and also compliant with the
 9 rules and regulations that they have requiring water and
 10 sewer connection.
 11 **Q. Is the private pumping station, referenced in the**
 12 **Club Mariner letter, the same concept that's referenced**
 13 **in the Allapattah Trace letter?**
 14 A. Yes, it is.
 15 A particular project will have a private pump
 16 station to serve its particular project. If it's a
 17 single building or attractive apartments, then the
 18 developer would have a -- essentially, a private
 19 collection system from those buildings that go to the
 20 private pump station. And from there it's pumped into
 21 the county-owned force main.
 22 MR. GLAZER: All right. Next I am going to ask
 23 that the court reporter mark as our Deposition
 24 Exhibit 5, a letter dated November 8, 2013, addressed
 25 to Earlington Square Apartments, LLC.

Page 14

1 (Whereupon, Exhibit 5 was marked for
 2 identification.)
 3 BY MR. GLAZER:
 4 **Q. And are you familiar with that letter?**
 5 A. Yes, I am.
 6 **Q. And is that your signature on it?**
 7 A. Yes, it is.
 8 **Q. All right. For what purpose was this letter**
 9 **written?**
 10 A. This also was a letter of availability for an
 11 apartment complex seeking water and sewer availability.
 12 **Q. Are you familiar with the location of this**
 13 **project?**
 14 A. Yes, I am.
 15 **Q. And what Miami-Dade Sewer Pump Station would**
 16 **serve the site of that project normally, the Earlington**
 17 **Square project?**
 18 A. The Earlington Square Apartments project is also
 19 abutting 8-inch gravity sewers that flow into the Pump
 20 Station 54.
 21 **Q. So the pump station that would serve the**
 22 **Allapattah Trace project?**
 23 A. I see it.
 24 **Q. And is the moratorium that's referenced in our**
 25 **Exhibit 5 the same moratorium that's referenced in the**

Page 15

1 **Allapattah Trace letter?**
 2 A. Yes, it is.
 3 **Q. What would be the solution for Earlington Trace**
 4 **(sic) to provide sewer to this site, if the moratorium**
 5 **is still in place when they're ready to build?**
 6 A. They would have the same option as the Allapattah
 7 project. They would do a private pump station and
 8 construct a force main that would connect to a water and
 9 sewer force main.
 10 MR. GLAZER: I am going to ask the court
 11 reporter to mark next our Deposition Exhibit
 12 Number 6, a letter dated October 21, 2013, addressed
 13 to Earlington Square Apartments, Limited.
 14 (Whereupon, Exhibit 6 was marked for
 15 identification.)
 16 BY MR. GLAZER:
 17 **Q. And are you familiar with Exhibit 6?**
 18 A. Yes, I am.
 19 **Q. What is that letter?**
 20 A. That is also a letter of availability for this
 21 project. But this was the initial letter of
 22 availability.
 23 **Q. And when you say "this project," you're referring**
 24 **to Earlington Square?**
 25 A. Yes. Earlington Square Apartments.

Page 16

1 **Q. And do you know what happened that led from the**
 2 **October 21 letter to the November 8th letter that was**
 3 **our Exhibit 5?**
 4 A. Yes, I do. I pulled the project folder and I
 5 looked at the contents. The first letter, the one dated
 6 October 21, had a point of connection for water and also
 7 for sewer, suggested that the Pump Station 54 was in
 8 moratorium, and that they were not going to allow sewer
 9 connection unless the developer could show a No Net
 10 Increase. Which essentially says that the project
 11 that's being proposed has the same or less sewer flow
 12 than the existing buildings.
 13 **Q. All right. And then after the October 21st**
 14 **letter was written, did Miami-Dade County receive a call**
 15 **from the developer?**
 16 A. I believe so. There are some handwritten notes
 17 on a copy of the October 21st letter.
 18 **Q. Do you recognize the name "Related Group"?**
 19 A. Yes. I recognize the name Related Group and the
 20 name Jason Goldfarb.
 21 **Q. And how are you familiar with them?**
 22 A. Related Group and Jason are frequent requesters
 23 for letters of availability for Affordable Housing.
 24 **Q. You've interacted with them in the past?**
 25 A. Yes, I have.

Page 17

1 **Q. Multiple occasions?**
 2 A. Multiple occasions.
 3 **Q. And so what, then, changed between the**
 4 **October 21st and the November 8th letter?**
 5 A. The handwritten note on the letter says, Per
 6 customer, please revise for private pump station.
 7 **Q. And so what, then, was done leading up to the**
 8 **November 8th letter?**
 9 A. The handwritten notes, I believe, were written by
 10 the engineer; I recognize his handwriting.
 11 **Q. And that's an engineer for who?**
 12 A. For Miami-Dade Water and Sewer Department.
 13 **Q. And then what?**
 14 A. And subsequent to that call, there was a revision
 15 to the points of connection by that same engineer,
 16 providing an option for the developer to connect a
 17 private pump station to connect to -- to install a force
 18 main to connect to the department-owned force main.
 19 **Q. In your experience, is it common for developers**
 20 **to seek revisions to these types of letters of**
 21 **availability?**
 22 A. Yes, it is.
 23 **Q. And, in fact, in advance of the Florida Housing**
 24 **cycles, do you get a lot of requests for these kinds of**
 25 **letters?**

Page 18

1 A. We get a -- a huge number of Affordable Housing
 2 LOA requests during the course of cycle for the Florida
 3 Housing Finance Corporation. But throughout the years,
 4 developers will come in anticipation of development,
 5 just to make sure that we do have the water sewer
 6 availability, and to have some notice as to what those
 7 points of connection would be.
 8 **Q. With regard to the Earlington Square Apartments**
 9 **project, on November 8, 2013, was sewer service**
 10 **available to this project on the date of the letter as**
 11 **the same way as you testified it was available for**
 12 **Allapattah Trace?**
 13 A. Yes, the same way.
 14 **Q. And that is?**
 15 A. The developer would install a private pump
 16 station and install a force main that would connect to a
 17 county-owned force main.
 18 **Q. By the way, do you know whether or not the**
 19 **Earlington Square site is closer or further from Pump**
 20 **Station 54 as the Allapattah Trace site?**
 21 A. It is slightly further away. Both of them are on
 22 city blocks that are on, I think, Northwest 17 Avenue.
 23 But Allapattah is actually abutting Northwest 17 Avenue,
 24 and the Earlington Heights (sic) is halfway in the
 25 block; so a hundred, a couple hundred feet.

Page 19

1 **Q. Earlington Square is a couple hundred feet**
 2 **further from the pump station?**
 3 A. Yes.
 4 **Q. And --**
 5 A. I'm sorry. Further away from --
 6 **Q. Not the pump station, the force main; my mistake.**
 7 **Let me make sure our record is clear.**
 8 **Which project is further from the force main?**
 9 A. Earlington Heights.
 10 **Q. Earlington Square?**
 11 A. Earlington Square.
 12 **Q. Okay. And, finally, Mr. Pile, do you anticipate**
 13 **being in or within Tallahassee the week of April 29th,**
 14 **2014?**
 15 A. No, I do not.
 16 MR. GLAZER: I don't have any further questions
 17 right now. Some of the other folks on the phone
 18 might.
 19 CROSS-EXAMINATION
 20 BY MR. DONALDSON:
 21 **Q. Mr. Pile, this is Michael Donaldson. I am in**
 22 **Tallahassee, Florida. I am the lawyer for the Related**
 23 **Group, and specifically for purposes of the proceeding**
 24 **today, we are Town Center; and that's one of the letters**
 25 **I think you looked at.**

Page 20

1 A. Okay.
 2 **Q. I'm going to be asking you some follow-up**
 3 **questions to what Mike asked. None of my questions are**
 4 **designed to fool you in anyway.**
 5 **Is the reception good enough down there that you**
 6 **can hear me?**
 7 A. Yes, I can hear you fine.
 8 **Q. Okay. If at any time I ask you a question that's**
 9 **confusing -- obviously you did very good with**
 10 **Mr. Glazer -- I am sure you'll tell me you don't**
 11 **understand, and then we'll go on and I'll try to**
 12 **rephrase it.**
 13 **I am going to call -- well, I will call it**
 14 **Allapattah Trace, because that's the applicant. And I**
 15 **will tell you. What Town Center is doing here is,**
 16 **basically, we're challenging whether or not Allapattah**
 17 **has turned in an acceptable response to Florida**
 18 **Housing's latest process, which is the request for**
 19 **admissions -- request for applications process.**
 20 **Now, you indicated that you're familiar with the**
 21 **previous Florida Housing application processes; are you**
 22 **familiar with the current one?**
 23 A. I am familiar with the requests that come in. I
 24 don't work closely with Florida Housing Finance
 25 Corporation, as far as their regulations or procedures.

<p style="text-align: right;">Page 21</p> <p>1 We deal with the applications for letter of availability 2 that come in from developers.</p> <p>3 Q. Fair enough. So let me ask you some specific 4 questions in follow up to what Mr. Glazer asked you.</p> <p>5 Now, this kind of goes to your question -- or to 6 your answer of, capacity was available as of the 7 application deadline. Let me ask you this first: Did 8 Allapattah submit plans to you?</p> <p>9 And I am going to call "you" the Department of 10 Water and Sewer. I am just going to call it WASA, 11 because I understand that's the short name for your 12 department; is that okay?</p> <p>13 A. WASA is fine.</p> <p>14 MR. GLAZER: And for the court reporter, that 15 would be W-A-S-A?</p> <p>16 MR. DONALDSON: Yes. Thanks.</p> <p>17 BY MR. DONALDSON:</p> <p>18 Q. Did Allapattah submit plans to WASA for approval 19 of the private sewer pump station prior to November 12th 20 of 2013?</p> <p>21 A. No. Not to my knowledge.</p> <p>22 Q. Okay. And that's -- I am talking about the 23 private pump station that is in the letter that you 24 wrote concerning Allapattah and sewer capacity, okay?</p> <p>25 A. Okay.</p>	<p style="text-align: right;">Page 23</p> <p>1 A. Correct. Plans do not have to be submitted 2 for a letter of availability.</p> <p>3 Q. Now, is the approval of the private pump station 4 only required from WASA? In other words, is WASA the 5 only entity within Miami-Dade County that approves a 6 private pump station?</p> <p>7 A. That, I don't know. But we have to approve 8 the -- the plans for use of private pump station, 9 because they're connecting to our -- our force main. 10 There may be other regulatory agencies that regulate 11 private pump stations; probably DERM, maybe some others. 12 I don't know.</p> <p>13 Q. What about Department of Environmental 14 Protection?</p> <p>15 A. That is DERM.</p> <p>16 Q. Okay. What about --</p> <p>17 A. I'm sorry.</p> <p>18 Q. What about the Florida Department?</p> <p>19 A. Florida Department. I don't know if DEP 20 regulates private pump stations, or if they leave that 21 to the county environmental protection agencies.</p> <p>22 Q. Now, your letter also talks about a consent order 23 and all kind of things going on in Dade County. 24 Are there federal regulatory agencies that need 25 to be consulted about sewer determination?</p>
<p style="text-align: right;">Page 22</p> <p>1 Q. That's what I am talking about, in terms of the 2 private pump station.</p> <p>3 A. Right. I'm sorry. In a letter of availability, 4 they don't typically -- the developer typically does not 5 submit plans other than, you know, the statement of what 6 they're trying to build. You know, if they're building 7 100 units, 200 units, office, retail, whatever. And 8 they don't have to submit site plans, building plans, 9 construction plans, anything regarding what their -- how 10 they're going to construct what they're going to 11 construct.</p> <p>12 Q. Okay. So in terms of sewer capacity as of the 13 application deadline, could the Allapattah development 14 site hook up to sewer?</p> <p>15 A. Yes.</p> <p>16 Q. And they would hook up to sewer via your 17 alternative?</p> <p>18 A. They would hook up to a force main by use of a 19 private pump station.</p> <p>20 Q. Okay. So there was capacity to the Allapattah 21 site -- it's your testimony that there is sewer capacity 22 to the Allapattah site on November 12th, 2013?</p> <p>23 A. Yes. Absolutely.</p> <p>24 Q. Okay. Even though no plans were submitted for 25 the private pump station, correct?</p>	<p style="text-align: right;">Page 24</p> <p>1 A. The paragraph we have regarding all of those 2 other regulatories is a standard paragraph we put in 3 every letter of availability, and every developer 4 agreement. Simply, to notify the developer that the 5 department is subject to regulations by local, state, 6 and federal entities, including the consent decree and 7 other regulatory action.</p> <p>8 Q. Now. Mr. Pile, I sent with Mr. Glazer a couple 9 of the documents that I wanted to talk to you about as 10 well. Do you have those?</p> <p>11 MR. GLAZER: I've got them.</p> <p>12 MR. DONALDSON: Can you give them to him, 13 please, Mike?</p> <p>14 MR. GLAZER: Okay. Any particular order? One 15 of them was the Earlington -- the Allapattah Trace 16 letter, which we've already talked about. And then 17 I've got three others.</p> <p>18 MR. DONALDSON: Okay. I want to ask him about 19 the verification form now.</p> <p>20 MR. GLAZER: Okay. You want her to mark it?</p> <p>21 MR. DONALDSON: Yes, please.</p> <p>22 And we are up to Number 7?</p> <p>23 MR. GLAZER: Correct, Number 7.</p> <p>24 (Whereupon, Exhibit 7 was marked for 25 identification.)</p>

<p style="text-align: right;">Page 25</p> <p>1 MR. GLAZER: All right. He's got it and it's 2 been marked. 3 BY MR. DONALDSON: 4 Q. Mr. Pile, have you seen that document before? 5 A. Yes, I have. 6 Q. Okay. And it's my understanding that Miami-Dade 7 County doesn't -- has historically, or at least for the 8 last few years, has not signed for Florida Housing 9 forms; is that correct? 10 A. That's correct. 11 Q. Okay. But, nonetheless, the letters that you 12 write are supposed to be consistent with this form, is 13 that understanding -- is that your understanding? 14 A. If the Florida Housing Finance Corporation 15 requires either this form or a letter from the utility, 16 then, I mean, that's up to the Florida Housing Finance 17 Corporation regulation. 18 I surmise if our letters of availability were not 19 acceptable to the Florida Housing Finance Corporation, 20 then we would be doing something else. 21 Q. Correct. Okay. Correct. Fair enough. 22 Now, if you read that form, about halfway 23 through -- and would you agree with me that this is a 24 form that should be signed by the service provider? 25 A. Yes. The form looks like it should be signed by</p>	<p style="text-align: right;">Page 27</p> <p>1 the specified waste treatment service, other than 2 payment of hookup or installation fees, line extensions 3 to be paid for by the applicant, in connection with the 4 construction of the development, or such routine 5 administrative proceedings. 6 Could you confirm that? 7 A. Yes, I could confirm that also. 8 Q. So there's no impediments? 9 A. None that I am aware of. 10 Q. Okay. Now, when you say -- when you say there's 11 none that you're aware of, the alternative that's in 12 your letter -- and that's the letter to Allapattah that 13 mentions the private pump station -- is that guaranteed? 14 A. What, the private pump station guaranteed? 15 Q. Yes. 16 In other words, if the applicant did that 17 alternative, is there a guaranteed approval? 18 A. A private pump station, if it's regulated by 19 other entities, has to secure those approvals just like 20 the building they're constructing has to secure 21 approvals from the Building Department. So we don't 22 make guarantees about that. 23 Q. Okay. So there is no guarantee about that? 24 A. Well, the developer is responsible for installing 25 a private pump station in accordance with whatever</p>
<p style="text-align: right;">Page 26</p> <p>1 whatever utility is providing the water or sewer 2 service. 3 Q. Okay. And the -- now, about halfway down the 4 form says, and I am going to quote: The undersigned 5 service provider confirms that on or before the 6 submission deadline for the above FHSP request form, 7 proposal, or application; and then it lists four 8 different criteria. 9 Do you see those? 10 A. Yes, I do. 11 Q. And the first one is sewer capacity package 12 treatment or septic tank is available to the proposed 13 development. 14 Do you see that? 15 A. Yes, I do. 16 Q. And if you were to sign this form, I think your 17 testimony -- what would your testimony be? If you had 18 to sign this form, could you make that conformation? 19 A. I absolutely could confirm that number one is 20 correct; we do have sewer capacity. 21 Q. And that would be using the private pump station 22 alternative, correct? 23 A. Correct. 24 Q. Okay. How about Number 2? There are no 25 impediments for the proposed development for obtaining</p>	<p style="text-align: right;">Page 28</p> <p>1 regulations regulate the construction and installation 2 of the private pump stations. 3 Q. Okay. So that wouldn't, at the end of the day, 4 be WASA's call, correct? 5 A. Right. We would approve the use of the private 6 pump station, because it connects to our force main. 7 Q. Let's go to Number 3. To the best of our 8 knowledge, no variance or local hearing is required to 9 make this service available to the proposed development. 10 A. I would also agree to that. But that's also 11 outside my jurisdiction. Since I am not a municipality 12 that, I don't know if they would require additional 13 hearings for the proposed development. 14 Q. All right. What about Number 4: To the best of 15 our knowledge, there are no moratoriums pertaining to 16 this service, which were applicable to the proposed 17 development. 18 A. That's the one I am hesitant on. Because if it 19 speaks to a moratorium, there is a moratorium of the 20 gravity system; but there's no moratorium on a private 21 pump station's connecting to a force main. 22 Q. What about sewer capacity? As of November 12, 23 2013, would the moratorium allow capacity as of 24 November 12, 2013? 25 A. The moratorium for Pump Station 54 does not</p>

<p style="text-align: right;">Page 29</p> <p>1 prohibit connecting to our force main through a private 2 pump station. So we do have capacity through the force 3 main, but we don't have capacity, currently, when a pump 4 station is in moratorium.</p> <p>5 Q. So you said you were hesitant about that, because 6 there actually is a moratorium in place within the area 7 of the Allapattah Trace complex, the -- the proposed 8 development, correct?</p> <p>9 A. The moratorium that would connect to a gravity 10 system. But the moratorium is not a universal 11 moratorium on all sewer service, because they can do a 12 private pump station.</p> <p>13 Q. Mr. Pile, I want to go through your -- this is 14 Deposition Exhibit Number 1. This is your November 12, 15 2013 letter.</p> <p>16 A. Okay.</p> <p>17 Q. And I want to ask you a couple of things. 18 I think you kind of answered some of these in 19 responses to Mr. Glazer's question. This letter 20 indicates that there is an initial moratorium, and I 21 understand that you said a conditional moratorium, 22 what -- explain those again, if you would.</p> <p>23 What is an initial moratorium?</p> <p>24 A. An initial moratorium is -- and some of this may 25 be better answered by engineers -- but from -- when</p>	<p style="text-align: right;">Page 31</p> <p>1 requirements are met. Now, in that -- in that final 2 statement, all legal requirements, were you talking 3 about the approvals of the other agencies that may need 4 to grant approval for this? Is that correct?</p> <p>5 A. For the private pump station, yes.</p> <p>6 Q. Okay. Now, you're focusing in on the private 7 pump station, too. Your letter goes on to talk about, 8 which appears to me to be the installation of pipes; is 9 that correct?</p> <p>10 A. Yes.</p> <p>11 Q. And it looks like to me -- and I am not that 12 familiar with the area -- but it looks like, to me, the 13 installation of those pipes goes about five city blocks; 14 would you agree with that?</p> <p>15 A. Yes, I would.</p> <p>16 Q. Okay. Now, can you look at -- I did a Google 17 map -- well, I didn't do it, because I am not very 18 computer literate -- I also gave Mr. Glazer, in the 19 documents I gave him, a Google map; do you see that?</p> <p>20 A. Yes, I do.</p> <p>21 MR. GLAZER: Do you want this marked? 22 MR. DONALDSON: Yes, please. 23 (Whereupon, Exhibit 8 was marked for 24 identification.) 25 BY MR. DONALDSON:</p>
<p style="text-align: right;">Page 30</p> <p>1 drafted, I see initial moratorium and a conditional 2 moratorium.</p> <p>3 My understanding is an initial moratorium is when 4 Water and Sewer Department notices that the pump station 5 it's nominal average pump operating time -- which is 6 called NAPOT -- exceeds whatever hourly rate that pump 7 station is rated at.</p> <p>8 And then after we submit an action plan to remedy 9 that situation, then it goes into conditional 10 moratorium.</p> <p>11 Q. Okay. Now, the letter -- I am at the third 12 paragraph, too -- it talks about -- about three 13 sentences down, after you mentioned the Department of 14 Regulatory and Economic Resources. I am going to ask 15 you some questions about that in a minute -- but it says 16 the owner cannot increase the flow to the gravity system 17 that the property is already connected to.</p> <p>18 Do you see that?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. So then you talk about, if at the time 21 this project is ready for construction, and the pump 22 station is still in moratorium, a private pump station 23 is acceptable, correct?</p> <p>24 A. Yes.</p> <p>25 Q. And then it says, as long as all legal</p>	<p style="text-align: right;">Page 32</p> <p>1 Q. Okay. Now, Mr. Pile, I think you testified 2 earlier, you're very familiar with this area, correct?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. Now, does that fairly represent -- and, I 5 mean, specifics, I don't know -- but does that fairly 6 represent the length of the installation of the pipe 7 that your letter talks about?</p> <p>8 A. Yes, it would.</p> <p>9 Q. Okay. And that's roughly five city blocks, 10 correct?</p> <p>11 A. Correct.</p> <p>12 Q. Now, I don't know if that -- if the -- the amount 13 is accurate; I think we basically used the Google scale. 14 But it appears to be approximately 2,700 square feet of 15 linear pipe (sic); would you agree with that?</p> <p>16 MR. GLAZER: You said "square feet." 17 MR. DONALDSON: I am sorry; linear feet. 18 THE WITNESS: Yes, I would agree. 19 BY MR. DONALDSON: 20 Q. Okay. Now, this is a fairly dense area in Dade 21 County, isn't it?</p> <p>22 In other words, the density is pretty high; there 23 is a lot of development in this area, right?</p> <p>24 A. Yes. Almost fully developed.</p> <p>25 Q. Okay. And it appears as though no matter where</p>

<p style="text-align: right;">Page 33</p> <p>1 the path of that pipe goes, it's going to go through 2 both public and private property, correct? 3 A. No. The -- the force main would have to go 4 through the public right of way. So it would go down 5 34th Street. 6 Q. Okay. So if it goes through the public right of 7 away, who approves that? 8 A. The developer would have to go to, I guess, the 9 governmental entity that has control over that 10 particular road. If it's a city road, I guess they -- 11 and I am guessing, because I don't put pipes in the 12 ground. They coordinate through Public Works to get 13 permission to dig up the streets, and go through the -- 14 the local police department for traffic control; 15 whatever they have to do to install pipes in the ground. 16 Q. Okay. So that wouldn't be WASA, correct? 17 A. We would still have to inspect the installation 18 of this stuff. So, yeah, we know -- we would have to 19 know when these pipes are going into the ground so we 20 can make certain it's being done correctly. 21 Q. Okay. What -- did you know what -- what the 22 procedure for going down a public right of way would be, 23 in terms of -- do you have to close roads? I mean, do 24 you have to hire police? Do you know what that would 25 entail?</p>	<p style="text-align: right;">Page 35</p> <p>1 Is it practical to go five city blocks with the 2 Allapattah Trace project? 3 A. It depends on the size of the project. I mean, I 4 don't make those type of economic decisions; the 5 developer does. And they'll weigh their different 6 options. And, again, those are decisions that I don't 7 see. 8 Q. Okay. Do you have any idea how much it would 9 cost just to install the pipes? Do you know -- have any 10 idea how much per linear feet it would cost to install a 11 pipe like this? 12 A. I do not have any -- not even an ballpark idea. 13 Q. Okay. Now, do you know how long -- I am just -- 14 I am just looking at your alternative now. And I am 15 looking at the construction of a private pump station, 16 and I am looking at the installation of the 2,700 17 feet -- linear feet of pipe, and the connection of the 18 sewer main. 19 With permitting and application, do you 20 understand or have any idea how long that would take to 21 actually finish? 22 A. Actually, no, I don't. I mean, the -- the 23 contractors know all of this stuff, because they 24 actually put the pipes in the ground. And I don't -- I 25 don't participate in that part of the process.</p>
<p style="text-align: right;">Page 34</p> <p>1 A. I do not know. All of that happens after my 2 involvement in the Water and Sewer Agreement. 3 Q. Okay. And I am assuming the private pump station 4 would actually be constructed on the development site; 5 is that correct? 6 A. Right. The private pump station would be on the 7 developer's property. 8 Q. Okay. So we're talking about the construction of 9 a private pump station and roughly five city blocks 10 installation of pipeline, correct? 11 A. Yes. 12 Q. And that gets you -- that gets you to this other 13 sewer main, correct? 14 A. Correct. 15 Q. Okay. Now, you were asked some questions about 16 Club Mariner, and it just kind of fits in what we're 17 talking about here. And you said that Club Mariner 18 wasn't offered -- and if I am putting words in your 19 mouth, tell me, and I'll go back and look at my notes. 20 With Club Mariner, a decision was made by an 21 engineer dealing with the practicality of hooking up to 22 a sewer main some distance away from the development 23 site. Do you remember that? 24 A. Yes, I do. 25 Q. And that's why that wasn't offered here.</p>	<p style="text-align: right;">Page 36</p> <p>1 Q. So there could be impediments to the construction 2 of this alternative, correct? 3 A. Not sure what you mean by "impediments." But, 4 certainly, there are other things that the developer has 5 to do to put the pipes in the public right of way. 6 Q. Could that be denied? 7 A. I don't know how a municipality or Public Works 8 Department would deny the placement of utilities in a 9 public right of way, because that's how utilities are 10 installed. 11 Q. All right. Could it lead to maybe even a 12 reconfiguration of this line; because there are other 13 lines there, I am assuming? 14 A. I assume there are other utility lines in 34th 15 Street. And so whenever a contractor, you know, is 16 submitting plans, you know, they ask you where 17 everything else is that's in the street. Especially 18 when they cross streets, and they have to go above or 19 below, you know, other pipes that are going north-south, 20 since this pipe would be going east-west. 21 Q. Now, Mr. Pile, you're not an engineer, right; 22 you're a lawyer by trade, correct? 23 A. Correct. 24 Q. I am not sure which is more dangerous. But we'll 25 just leave that alone.</p>

<p style="text-align: right;">Page 37</p> <p>1 So you're not familiar with the other processes</p> <p>2 that a developer would go through here, in order to get</p> <p>3 this alternative private pump station installed and</p> <p>4 constructed; is that correct?</p> <p>5 A. I don't have any first-hand knowledge, correct.</p> <p>6 Q. Okay. My hesitation is I am looking through my</p> <p>7 notes, Mr. Pile; so I am still here.</p> <p>8 A. That's fine.</p> <p>9 MR. DONALDSON: I think the last document I</p> <p>10 sent you, and let's go ahead and mark it as, I guess,</p> <p>11 Exhibit 9.</p> <p>12 MR. GLAZER: Nine. Hold on one second.</p> <p>13 (Whereupon, Exhibit 9 was marked for</p> <p>14 identification.)</p> <p>15 MR. GLAZER: Go ahead.</p> <p>16 BY MR. DONALDSON:</p> <p>17 Q. Okay. Mr. Pile, I would ask you if you have ever</p> <p>18 seen that before; I don't think you have. But go ahead</p> <p>19 and look at the letter from Mr. Lezcano to Mr. Luis</p> <p>20 Castellon, vice president of development at RUDG.</p> <p>21 Do you see that?</p> <p>22 A. Yes, I do.</p> <p>23 Q. Okay. Let me know when you're finished.</p> <p>24 A. I got it.</p> <p>25 Q. Okay. Now, this is a letter from the Regulatory</p>	<p style="text-align: right;">Page 39</p> <p>1 agreement, then we would need a site plan and a lot more</p> <p>2 other information about the project from them.</p> <p>3 Q. Okay. Now, Mr. Lezcano -- do you know</p> <p>4 Mr. Lezcano, by the way?</p> <p>5 A. Yes, I do.</p> <p>6 Q. And he's apparently an engineer through the plan</p> <p>7 and review section, correct?</p> <p>8 A. Yes.</p> <p>9 Q. Now, his letter, in the first paragraph, it talks</p> <p>10 about the same county pump station as being in</p> <p>11 moratorium, which I think we all agree with, correct?</p> <p>12 A. Yes.</p> <p>13 Q. And then it goes on to say, at the end of this</p> <p>14 sentence: No sewer capacity certification is available</p> <p>15 for connections between these dates, and the dates are</p> <p>16 October 10th of 2013 through December 31st of 2018; do</p> <p>17 you see that?</p> <p>18 A. Yes, I do.</p> <p>19 Q. Now, if there's no sewer capacity certification,</p> <p>20 how can you conclude that there was actually sewer</p> <p>21 capacity as of November 12th, 2013?</p> <p>22 A. This letter from Frank Lezcano speaks only to the</p> <p>23 moratorium for Pump Station 54, which is the pump</p> <p>24 station that is under moratorium. And that pump station</p> <p>25 cannot receive any additional flow, any new connections.</p>
<p style="text-align: right;">Page 38</p> <p>1 and Economic Resources Environmental Plan Review section</p> <p>2 of Miami-Dade County are you familiar with that?</p> <p>3 A. Yes, I am -- in fact, that's the new name for</p> <p>4 DERM. And as you may know, some departments retain</p> <p>5 their old acronyms, even when the official name changes.</p> <p>6 Q. What is the relationship between DERM and WASA?</p> <p>7 A. DERM is the regulatory agency that oversees</p> <p>8 environmental issues with ground water, air pollution,</p> <p>9 that type of stuff. And Water and Sewer Department is a</p> <p>10 utility; we provide the service.</p> <p>11 Q. Okay. But you -- do you approve plans?</p> <p>12 A. Water and Sewer Department approves the water and</p> <p>13 sewer plans, as far as constructing the water and sewer</p> <p>14 facilities, yes.</p> <p>15 Q. And I think you have already testified earlier,</p> <p>16 that at least as of the application deadline, no plans</p> <p>17 have been turned in by Allapattah Trace, correct?</p> <p>18 A. Correct.</p> <p>19 Q. Okay. Have they turned in any, subsequent to the</p> <p>20 application deadline?</p> <p>21 A. There's no need for them to turn in anything.</p> <p>22 All they have to do is submit the application for the</p> <p>23 scope of the project; and then we do the rest, regarding</p> <p>24 the points of connection.</p> <p>25 If they were to come back to us for a developer</p>	<p style="text-align: right;">Page 40</p> <p>1 But this letter does not speak to sewer capacity in the</p> <p>2 county sewer system through its force main.</p> <p>3 Q. So as to the pump station nearest this proposed</p> <p>4 development, there's a moratorium; but your alternative</p> <p>5 basically allows the developer to pump around the pump</p> <p>6 station, for lack of a better way to say it?</p> <p>7 A. Right. The two ways to our sewage treatment</p> <p>8 center, either through the gravity sewer collection</p> <p>9 system, which flows downhill, and further pumped along</p> <p>10 perhaps by other pumping stations, as Pump Station 54</p> <p>11 does, or directly into the sewage treatment center from</p> <p>12 other force mains.</p> <p>13 Q. Now, the Regulatory and Economic Resource</p> <p>14 Division, which is now DERM, that's the division that</p> <p>15 actually -- "create" is not the right word -- implements</p> <p>16 the moratorium; is that correct?</p> <p>17 A. You may have to talk to an engineer regarding</p> <p>18 how -- how that operates. I know there are -- I mean,</p> <p>19 there is a moratorium. And it's a conditional at some</p> <p>20 point. After we submit remedial action plan, it's</p> <p>21 either -- and then, like, an initial moratorium when the</p> <p>22 NAPOT exceeds whatever hourly rating that particular</p> <p>23 pump station has.</p> <p>24 Q. Now, you -- you answered Mr. Glazer's questions</p> <p>25 about, you know, having dealt with developers</p>

<p style="text-align: right;">Page 41</p> <p>1 previously. And usually when the -- well, when the 2 Florida Housing cycle begins, you get flooded with 3 requests for sewer capacity, sewer availability letters. 4 Do you recall how many you got this year? 5 A. I believe this year -- well, for this particular 6 cycle, it was over 100. 7 Q. Okay. How about for this particular area where 8 this moratorium is in place; do you recall that? 9 A. I don't have a breakdown by pump station by area. 10 I mean, we might be able to, but I don't have any 11 recollection of how many were in this particular area. 12 Q. Okay. And let's -- let's assume -- we know it's 13 at least two, okay. And let's just assume that it was 14 just those two, and each of those two are granted this 15 alternative, okay. 16 What if they both came to you at the same time, 17 would they both necessarily be approved? 18 I mean, is it a guarantee that if you do the pump 19 station with the installation of the linear feet of pipe 20 that you're going to ultimately be approved? 21 A. I believe so. The only caveat I would have there 22 would be the force main pressure analysis. But that is 23 done by the engineers to make certain that whatever 24 private pump station each development has, has 25 sufficient force to pump into whatever pressure is in</p>	<p style="text-align: right;">Page 43</p> <p>1 we have a shallow water table down here. Plus, we're 2 probably only a quarter mile away from a canal. 3 So there's a lot of de-watering issues. You 4 would have to brace the side of the trench, and then run 5 it whatever distance that they need to. Whereas, the 6 private pump station, you should have your private 7 collection system within the property, and then you're 8 abutting a 20-inch force main. So that seemed to be 9 much cheaper. 10 But if the developer wanted the option, then they 11 go -- after this -- after this letter was sent, the 12 developer could very easily have given us a call and 13 said, Hey, we want the option of doing gravity sewer; in 14 which case we would revise the point of connection and 15 provide that option for the developer. 16 Q. Is that what happened with Allapattah Trace; did 17 they come back to you, and say we want the alternative? 18 A. No. I believe Allapattah Trace was initially 19 offered with the -- the private pump station, force main 20 connection. 21 Q. Okay. So there was no letter -- an initial 22 letter that Allapattah Trace then came back and said, 23 Can we have the alternative? Their letter always 24 included the alternative, correct? 25 A. Correct.</p>
<p style="text-align: right;">Page 42</p> <p>1 the force main that they are connecting to. 2 But these are pretty sizable force mains. I 3 think the one that they're connecting to is an 18 inch. 4 So the private pump station is supposed to be ready to 5 handle that. So, yeah, there's -- there should be no 6 problems with both of them connecting to the same force 7 main at the same time. 8 Q. I want to ask you some -- about Club Mariner 9 again; I want to compare Club Mariner to with 10 Allapattah. 11 A. Okay. 12 Q. In Club Mariner's situation, how could -- you 13 indicated that -- that the Club Mariner option, or 14 whatever alternative, was not practical; who made that 15 decision? 16 A. The engineer. The water -- the water and sewer 17 engineer. 18 Q. Do you know why it was impractical or not 19 practical? 20 A. I had a discussion with him, and he suggested 21 because the -- the closest manhole, which is the closest 22 point of connection for the gravity sewer, was at a 23 depth of about 16 feet; that's very deep. And it's much 24 more expensive to connect to a very deep manhole, 25 because you have to trench it, and you have de-water it;</p>	<p style="text-align: right;">Page 44</p> <p>1 Q. Now, why would that be? 2 A. I am sorry? Why would -- 3 Q. Yeah. When you're asked for a sewer capacity 4 letter, do you always include alternatives? 5 A. It depends on the situation. As I said, every 6 property is unique to its points of connection. And 7 sometimes there are options, you know, for gravity 8 sewer. You know, you can connect to an abutting sewer, 9 the northern part of the property or the western part of 10 the property. Or if they want, they can do a private 11 pump station, you know, connect to another force main. 12 And we'll give developers these options for whatever is 13 most convenient or economical to them. 14 Q. Now, who within Dade County actually grants sewer 15 allocation; is it WASA or is it DERM? 16 A. I believe it's DERM that gives the allocation 17 letter. And that's something they have to do when they 18 come for a developer agreement, but not something they 19 have to do for a letter of availability. 20 Q. Now, the alternative that's in your letter of 21 availability, can DERM deny that alternative? 22 A. No. 23 Q. Why not? 24 A. Because we have capacity. I mean, I don't know 25 of any reason why they could. Maybe Frank Lezcano can</p>

<p style="text-align: right;">Page 45</p> <p>1 think of a reason, but I certainly cannot. There's no 2 moratorium for a force main, and so they can connect to 3 our force main.</p> <p>4 Q. Even though, I think you said, it's actually DERM 5 that determines sewer capacity, correct?</p> <p>6 A. They do the capacity for the pump stations. And, 7 you know, I imagine you'll be deposing Frank, or another 8 engineer for DERM, so maybe they can talk more about 9 their regulatory side.</p> <p>10 But certainly, from WASD's point of view, we have 11 capacity in our force mains. Because it flows directly 12 to the treatment center and no there's no moratorium; so 13 there's no impediment to them connecting to our force 14 main for capacity.</p> <p>15 Q. Now, this is not a situation where you have, I 16 think it's called, No Net Increase, right?</p> <p>17 In other words, the -- the new proposed 18 development will need more capacity than the existing 19 development on the site, correct?</p> <p>20 A. That's what we anticipate. Of course, that 21 depends upon what the existing use of the property is 22 right now, and what's going to be put up in its 23 replacement.</p> <p>24 Q. Okay. Do you know what's on the site right now?</p> <p>25 A. I don't know in detail. Just from an aerial</p>	<p style="text-align: right;">Page 47</p> <p>1 A. No. The moratorium is there until the -- the 2 pump station is improved, and the NAPOT, the nominal 3 operating pump time, is reduced, and is under the 4 maximum.</p> <p>5 And that will come whenever, you know, the county 6 is able to do whatever is necessary to do that. Whether 7 it's adding another pump, upgrading the pump, or fixing 8 the pipes to prevent infiltration of ground water.</p> <p>9 Q. And, Mr. Pile, this may get out of -- out of your 10 realm of experience, but I am going to just ask you some 11 questions anyway. And I want to deal with a concept 12 called ability to proceed; which is an important concept 13 for Florida Housing and its application process.</p> <p>14 Do you have any understanding as to what "ability 15 to proceed" means?</p> <p>16 A. No. I mean, I could guess. But I don't know 17 what Florida Housing Finance Corporation determines that 18 to mean.</p> <p>19 Q. Right. I will represent to you that we deposed 20 Mr. Ken Reecy, who is a Florida Housing employee. And 21 he agreed with me that ability to proceed basically 22 means the more shovel-ready a project is, the better its 23 ability to proceed.</p> <p>24 Do you have that understanding?</p> <p>25 A. Sure. Sounds reasonable.</p>
<p style="text-align: right;">Page 46</p> <p>1 view, you see some other buildings, and you see the 2 zoning; so you assume it's retail or office. But a much 3 smaller square footage than 80 apartment units would 4 have.</p> <p>5 Q. Okay. Now, you -- you said -- I think you said 6 you've been in your current position for approximately 7 three years, correct?</p> <p>8 A. Yes.</p> <p>9 Q. Now, in your experience, is it usual and 10 customary to provide a private pump station for a 11 development which would then require the installation of 12 a sewer line spanning five city blocks from the 13 development site to a sewer main connection? Is that 14 customary?</p> <p>15 A. Customary? I mean, we do private pump stations, 16 you know, every week, depending upon the circumstance. 17 The distance? This one seems longer than others. I 18 don't know if it's the longest I have seen. I am -- I 19 am probably certain I've seen longer; usually it's only 20 a block or two that the developer would have to run to 21 find a force main.</p> <p>22 Q. Now, does the fact that your -- I am going back 23 to your November 12th letter to Allapattah.</p> <p>24 Does the fact that you mention an alternative 25 list the moratorium?</p>	<p style="text-align: right;">Page 48</p> <p>1 Q. If there was no moratorium, would Allapattah, 2 today, be able to hook up to the sewer? Would it have 3 sewer capacity today, remove the moratorium?</p> <p>4 A. Yes.</p> <p>5 Q. Now, with the moratorium in place, and let's take 6 out, for purposes of this question, the alternative; 7 let's take that out. We're not talking about a pump 8 station, and we're not talking about the 2,700 square 9 feet of linear feet (sic), okay?</p> <p>10 A. Okay.</p> <p>11 Q. Would Allapattah have sewer capacity today?</p> <p>12 MR. GLAZER: Object to the form.</p> <p>13 You can answer.</p> <p>14 THE WITNESS: If there were no -- if there were 15 no WASD force main available, and there was only 16 gravity, but that was in moratorium, then, no, there 17 would be no sewer capacity that WASD could provide.</p> <p>18 BY MR. DONALDSON:</p> <p>19 Q. All right. And what about as of November 12th of 20 2013; same answer?</p> <p>21 A. Well, we had -- I'm sorry. You're assuming that 22 there was no force main available?</p> <p>23 Q. I am assuming that there was a moratorium on the 24 force main.</p> <p>25 A. There's no such thing of moratorium on the force</p>

Page 49

1 main.

2 **Q. Yeah. I'm sorry.**

3 **There was moratorium on the private pump station.**

4 **And we're not talking about the alternative right now,**

5 **we're just talking about the...**

6 A. Okay. I'm sorry. There's no moratorium on the

7 private pump station? There could be moratorium --

8 okay -- if there's a moratorium on the public Pump

9 Station 54, and there were no public force main

10 available, then, no, there would be no -- no

11 availability for sewer, because we could not provide

12 gravity or force main.

13 BY MR. DONALDSON:

14 **Q. Okay. So let's add the alternative to that. I**

15 **think you testified you didn't know how long it would**

16 **take to get that alternative permitted and constructed;**

17 **is that correct?**

18 A. Correct.

19 **Q. If it takes a year, is that project shovel-ready?**

20 A. Shovel-ready, yeah. Yeah, because they could put

21 the shovels in the ground as soon as they start getting

22 permits for whatever project. I mean, if it takes them

23 a year to complete the project -- I mean, shovel-ready,

24 you know, even President Obama was confused about that

25 term.

Page 50

1 **Q. Okay. Let's modify "shovel-ready." Could they**

2 **start building their development, their actual**

3 **development?**

4 A. The -- the contractors have got to go through

5 whatever building permit process to approve whatever

6 plans. And you've got to get your plans approved before

7 you can put the shovels in the ground. But, you know,

8 before they can get their plans approved, they've got to

9 get water and sewer availability.

10 So if we tell them they can connect via gravity

11 or via private pump station in a force main, then they

12 submit those plans and we approve those, and they go to

13 the Building Department. And then they approve those

14 plans, and then they can start putting shovels in the

15 ground.

16 **Q. And how long would that take?**

17 A. I am not a contractor; I don't know.

18 **Q. Okay. Can WASA sign a developer agreement**

19 **without an allocation letter from DERM?**

20 A. No, I don't think we can.

21 **Q. Okay. And that's kind of where I am -- that's**

22 **really kind of where I am going with the questions.**

23 **The fact that there's this alternative, doesn't**

24 **the applicant actually have to construct and complete**

25 **the alternative before they can actually ask to develop**

Page 51

1 **the property?**

2 A. No. They can -- you know, they can start

3 construction on the water and sewer portions. And,

4 again, I am not a contractor. But I -- but I do not

5 think they have to install the water and sewer

6 facilities before they start construction on their

7 actual building.

8 I think they can do it all together, but they

9 certainly cannot connect to water and sewer facilities

10 until they have installed, and approved, and properly

11 conveyed.

12 **Q. Okay. Let me try it this way: Do you know if**

13 **Allapattah could obtain a permit without an allocation**

14 **letter from either DERM or WASA -- or whoever signed**

15 **developer agreement from WASA -- could they start**

16 **building?**

17 A. No, I don't think they can. I think they need a

18 sewer allocation before they can get these plans

19 approved.

20 **Q. How do you get a sewer allocation?**

21 A. Well, they need to have sewer availability,

22 either through an abutting gravity sewer, or through a

23 private pump station force main.

24 **Q. Do they need to construct that?**

25 A. No.

Page 52

1 **Q. Going through my notes, Mr. Pile, bear with me.**

2 **One thing I just saw.**

3 **The allocation letter that you were talking**

4 **about, who issues that?**

5 A. I think the allocation letter is issued by DERM.

6 **Q. So you would need that letter from DERM before**

7 **the developer could actually move forward with anything,**

8 **correct?**

9 A. They need sewer capacity, water and sewer

10 capacity -- water availability and sewer capacity.

11 **Q. And that would be even your alternative, right?**

12 **DERM would still ultimately have to approve it, correct?**

13 A. Yes. DERM has to approve, you know, their water

14 and sewer availability. And I tell you, I am not a

15 contractor, so I don't know what form they get from

16 them. You know, if it's a private pump station force

17 main rather than abutting gravity. But either way, from

18 water and sewer -- from our department's perspective,

19 they have sewer capacity if they can do private pump

20 station or gravity; either one is good for us.

21 **Q. If the developer cannot obtain a permit to start**

22 **construction without this allocation letter, which DERM**

23 **gives, and an agreement from WASA depends on the DERM**

24 **letter, then how can there be sewer capacity as of**

25 **November 12th, 2013?**

<p style="text-align: right;">Page 53</p> <p>1 A. Because they have capacity through the private 2 pump station to the force main.</p> <p>3 Q. Even though there's no guarantee that that will 4 be approved?</p> <p>5 MR. GLAZER: Object to the form.</p> <p>6 THE WITNESS: You're asking about approval. 7 Water and Sewer Department approves that method of 8 connecting to our sewer system. The fact that they 9 have to go through, you know, Public Works or the 10 Building Department for other stuff, other regulatory 11 agencies, that's fine.</p> <p>12 BY MR. DONALDSON:</p> <p>13 Q. So if you need to get ultimate approval from DERM 14 as to sewer capacity, how can your letter be used to 15 establish that there was sewer capacity as of 16 November 13th -- November 12, 2013?</p> <p>17 A. Because we -- we can provide, and this letter 18 does it -- it's the letter of availability of sewer, 19 they can connect; if they can't connect to the gravity, 20 then they connect to the force main. They've got either 21 option.</p> <p>22 Q. So you're -- WASA determines points of 23 connection, not necessarily allocation, correct?</p> <p>24 A. Yeah. I think that DERM does, like, the 25 allocation; they determine what type of flow is going to</p>	<p style="text-align: right;">Page 55</p> <p>1 extremely uneconomical for you. Or maybe we'd just tell 2 them, okay, connect and run a force main ten miles.</p> <p>3 Q. So the sewer capacity determination that you make 4 in your letter is based on the existence of the 5 alternative, correct?</p> <p>6 A. Correct.</p> <p>7 Q. If there was no alternative, then there would be 8 no capacity, correct?</p> <p>9 MR. GLAZER: Objection; form. 10 Mike, we're getting a little repetitive here. 11 MR. DONALDSON: Okay. That's fine. 12 Just trying to make sure that it's clear. 13 THE WITNESS: Yes, that's clear.</p> <p>14 BY MR. DONALDSON:</p> <p>15 Q. And this might be my last question: Can your 16 engineers affirmatively determine that the force main 17 we're talking about here that's, I guess, five blocks 18 away, and that's listed in your letter, can that be 19 tapped without ever reviewing any plans? Can your 20 engineers determine that?</p> <p>21 A. Our engineers determine that the force main is 22 the point of connection. When the contractor submits 23 the plans to install the force main down Northwest 34th 24 Street, there are plans reviewers, inspectors, and we've 25 got to make certain that they're doing it correctly.</p>
<p style="text-align: right;">Page 54</p> <p>1 come from a particular development. You know, whether 2 it's apartments, office, retail, or what have you, 3 there's a certain flow associated with that, the number 4 of persons or square footage.</p> <p>5 And they also determine if there's capacity in 6 the system, such as a moratorium on the gravity system. 7 So if one is unavailable because there's a moratorium, 8 then the next option is a force main. And those are 9 the -- the points of availability as determined by the 10 Water and Sewer Department.</p> <p>11 Q. Okay. And I don't mean to sign flippant by this, 12 but -- so, in essence, if there's a moratorium in place, 13 you will always have an alternative, even if it's a 14 private pump station and the connection point is a mile 15 from the development site; there's always an 16 alternative, correct?</p> <p>17 A. Engineers will tell you, anything is possible; 18 it's just a matter of getting it done. From our point 19 of view, we would -- if there's moratorium on the -- the 20 gravity sewer that serves that particular area, then we 21 would write a point of connection for private pump 22 station and a force main. If that were, you know, 23 five miles -- ten miles, you know, I don't know if we 24 would draft that. Certainly we would contact the 25 developer and say, you know, a force main may be</p>	<p style="text-align: right;">Page 56</p> <p>1 You know, it's not, you know, we get them a point 2 of connection and then just leave them to go willy-nilly 3 and digging up the streets and tapping into our force 4 mains. It's all heavily regulated and very well 5 inspected. And that's why we're one of the largest 6 utilities in the southeast in the country, and we do 7 this stuff every day.</p> <p>8 Q. Last two questions, Mr. Pile: Did WASA, as of 9 November 12, 2013, have the authority to approve, on its 10 own, the private pump station mentioned in your letter?</p> <p>11 A. I don't know who else approves the installation 12 of private pump stations. If there's a municipal 13 component or a building code component. We just 14 approve the letter of availability, that's all it is. 15 It's a letter of availability. It's preliminary; it 16 doesn't review plans. They don't have to submit plans 17 for a letter of availability.</p> <p>18 Q. So would you agree that there are other steps -- 19 maybe we don't know how many steps -- but there are 20 other steps and other approvals required to actually 21 complete the private pump station and the installation 22 of the 2,700 linear feet of pipe?</p> <p>23 A. Yes. Obviously. And all of that would come 24 after they would submit a developer -- a request for a 25 developer agreement.</p>

<p style="text-align: right;">Page 57</p> <p>1 For a letter of availability, all it is, is 2 simply, this is where we have water, this is where we 3 have sewer; this is where you would connect to them. If 4 they decided to go forward with a project, then they 5 would have to get the actual, you know, allocation 6 letters from DERM. Start submitting plans. Give us a 7 lot more information about the project. And then if 8 they sign that with us, then they go forward going to 9 Public Works or the Building Code and, you know, putting 10 the shovels in the dirt. 11 Q. And I think your letter is only -- only good for 12 30 days, right, the letter of availability? 13 A. Yes. That's correct. 14 MR. DONALDSON: All right. That's all I have. 15 Thank you. 16 REDIRECT EXAMINATION 17 BY MR. GLAZER: 18 Q. Mr. Pile, a couple of follow-ups. 19 If a developer was connecting their development 20 to a county pump station, would there still be other 21 steps that they would have to do, beyond simply having 22 the letter of availability? 23 A. Yes. 24 Q. And are they the same kind of steps you just 25 described, with regard to the use of the private pump</p>	<p style="text-align: right;">Page 59</p> <p>1 moratorium on a public pump station, then that option is 2 closed, as long as the pump station is under moratorium, 3 unless they can get a No Net Increase letter. And then 4 their other option is to connect with a private pump 5 station to a force main. 6 Q. You said that in this last cycle you did roughly 7 100 letters of availability; is that correct? 8 A. Yes. 9 Q. And for any of those letters of availability, did 10 you need to communicate with DERM to write any of them? 11 A. Me? No. 12 Q. Is interaction with DERM necessary for Miami-Dade 13 Water and Sewer to write letters of availability? 14 A. For letters of availability, generally, no. 15 Although, some of that -- the engineers are making the 16 points of connection, they might. Only when they have 17 pump stations that are in moratorium and then maybe they 18 get information from DERM. I don't know what 19 information those engineers share with each other. 20 But for me, I -- I know Frank Lezcano; I have 21 talked to some people from DERM. But I rarely have to 22 interact with them, because I rarely require any 23 information from them. 24 Q. All right. The form that was marked as 25 Exhibit 7, the Florida Housing Verification Form, I</p>
<p style="text-align: right;">Page 58</p> <p>1 station? 2 A. Right. Even if they were connecting to an 3 abutting gravity -- let's say the project sits on the 4 south side of the street, but the gravity sewer is on 5 the north side of the street, they would still have to 6 go Public Works, or the local municipality. Because 7 they would have to stop traffic to dig up the trench, to 8 go across the street. 9 So even if it was on the south -- the gravity 10 sewer was on the south side of the street, they would 11 still have to dig a trench, you know, to tap into the 12 gravity -- the publicly-owned gravity sewer system to 13 run their gravity sewer lateral from the building to our 14 gravity sewer. 15 Q. And would they still need a permit from 16 Mr. Lezcano's department? 17 A. Right. Before they connect, before they can get 18 their building plans approved, they have to have water 19 and sewer plans approved. They have to have a sewer 20 availability, or sewer allocation from DERM. 21 Q. And DERM's role is the same, whether it's the 22 county pump station or private pump station? 23 A. Well, the pump station issue -- DERM regulates 24 public pump stations. I imagine they also regulate 25 private pump stations, but differently. If there was a</p>	<p style="text-align: right;">Page 60</p> <p>1 believe you testified that Miami-Dade does not sign 2 these forms, correct? 3 A. Correct. 4 Q. Do you know whether your letter of availability 5 is intended by Miami-Dade Water and Sewer to be the 6 alternative to the Florida Housing Form? 7 A. I imagine so. Again, I don't have the Florida 8 Housing Finance Corporation regulations in front of me. 9 But, obviously, if they have been accepting our letters 10 of availability in lieu of that form, then -- then we 11 have -- then this is the option for those developers 12 applying. 13 Q. And then looking at the Exhibit 8, which is the 14 Google Earth map, and the approximately 2,700 square 15 not square feet -- 2,700 linear feet of pipe, do you 16 know whether the Earlington Square project, if it's 17 approved and built, would require more or less linear 18 feet? 19 A. It would require a little bit more, since it's a 20 little bit further away from the 18-inch force main in 21 Northwest 22 Avenue. 22 MR. GLAZER: Mr. Pile, I think that's all I 23 have. 24 Anybody else? 25 MR. BROWN: This is Hugh Brown. No questions.</p>

1 MR. DONALDSON: Nothing from me.
 2 MR. GLAZER: Mr. Pile, you have the right to
 3 read and sign the deposition, to be sure the court
 4 reporter took it down accurately, or you can waive
 5 that right. It's up to you.
 6 THE WITNESS: Do I have to decide that now?
 7 MR. GLAZER: Pretty soon; you can just let me
 8 know.
 9 THE WITNESS: Okay. Thank you.
 10 THE COURT REPORTER: Would you like this
 11 transcribed?
 12 MR. GLAZER: Yes, we'll need this by the end of
 13 next week; you can e-mail it to me.
 14 (Whereupon, the deposition concluded at
 15 10:21 a.m.)
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25

1 CERTIFICATE OF OATH
 2 STATE OF FLORIDA
 3 COUNTY OF MIAMI-DADE
 4
 5 I, Jazzmin Alicea, FPR, Notary Public, State of
 6 Florida, certify that DOUGLAS PILE personally appeared
 7 before me on the 18th of April, 2014, and was duly
 8 sworn.
 9 WITNESS my hand and official seal this Friday, the
 10 24th of April, 2014.
 11
 12
 13
 14
 15 Jazzmin Alicea, FPR
 Notary Public, State of Florida
 MY COMMISSION #EE185242
 EXPIRES April 20, 2016
 16
 17
 18
 19
 20
 21
 22
 23
 24
 25



1 REPORTER'S CERTIFICATE
 2 STATE OF FLORIDA
 3 COUNTY OF MIAMI-DADE
 4 I, JAZZMIN ALICEA, FPR, certify that I was
 5 authorized to and did stenographically report the
 6 foregoing deposition of DOUGLAS PILE; that a review of
 7 the transcript was requested; and that the transcript,
 8 Pages 4 through 61, is a true record of my stenographic
 9 notes.
 10 I FURTHER CERTIFY that I am not a relative,
 11 employee, attorney, or counsel of any of the parties'
 12 attorneys or counsel connected with the action, nor am I
 13 financially interested in the action.
 14 The certification does not apply to any
 15 reproduction of the same by any means unless under the
 16 direct control and/or direction of the Reporter.
 17
 18 DATED this 25th day of April, 2014.
 19
 20
 21
 22
 23
 24
 25

1 ERRATA SHEET
 2 IN RE: PINNACLE RIO v. FLORIDA HOUSING FINANCE CORP.
 3 DEPOSITION OF: DOUGLAS PILE - TAKEN: 4/18/2014
 4 DO NOT WRITE ON THE TRANSCRIPT - ENTER CHANGES HERE
 5 Please sign, date, and return this sheet to our office.
 6 If additional lines are required for corrections, attach
 7 additional sheets.
 8 At the time of the reading and signing of the
 9 deposition, the following changes were noted:
 10
 11
 12
 13
 14
 15
 16
 17
 18
 19
 20
 21 Under penalty of perjury, I declare that I have read my
 22 deposition and that it is true and correct subject to
 23 any changes in form or substance entered here.
 24 SIGNATURE OF DOUGLAS PILE
 25

1 APRIL 18, 2014
2 Mr. Douglas Pile
3 3575 South Lejeune Road
4 Miami, Florida 33146

5 IN RE: PINNACLE RIO v. FLORIDA HOUSING FINANCE CORP.

6 Dear Mr. Pile:

7 Please take notice that on April 18, 2014, you gave your
8 deposition in the above-referenced case. At that time
9 you did not waive your signature. It is now necessary
10 that you sign your transcript.

11 Please contact our office at (954)525-2221 to make the
12 necessary arrangements to read and sign your transcript.
13 Our office hours are from 9:00 a.m. to 5:00 p.m., Monday
14 through Friday. You have 30 days in which to complete
15 this.

16 If your transcript is not signed within 30 days after
17 this letter has been furnished to you, the transcript
18 will be processed without a signed errata sheet. If you
19 wish to waive your right to read and sign, please sign
20 your name at the bottom of this letter and return it to
21 our office at 1218 Southeast 3rd Avenue, Fort Lauderdale,
22 Florida 33316.

23 Thank you for your cooperation in this matter.

24 Sincerely,

25 

JAZZMIN ALICEA, NOTARY PUBLIC,
STATE OF FLORIDA
UNITED REPORTING, INC.

I do hereby waive my signature

DOUGLAS PILE

A				
ability 47:12,14,21 47:23	52:23 56:25	appeared 63:6	attorney 62:11	bottom 65:14
able 41:10 47:6 48:2	agreements 5:17,22 5:25	appearing 2:2,7,12	attorneys 62:12	box 2:4,14
abovereferenced 65:7	ahead 37:10,15,18	appears 31:8 32:14 32:25	attractive 13:17	brace 43:4
absolutely 22:23 26:19	air 38:8	applicable 28:16	ausley 2:3,5 4:14	breakdown 41:9
abutting 8:25 9:2 10:4 12:9,11 13:1 14:19 18:23 43:8 44:8 51:22 52:17 58:3	alicea 1:17 62:4,22 63:5,15 65:19	applicant 4:16 20:14 27:3,16 50:24	authority 56:9	bronough 2:9
acceptable 20:17 25:19 30:23	allapattah 1:9 2:2 4:16 9:1 10:14 13:13 14:22 15:1,6 18:12,20,23 20:14 20:16 21:8,18,24 22:13,20,22 24:15 27:12 29:7 35:2 38:17 42:10 43:16 43:18,22 46:23 48:1,11 51:13	application 7:25 20:21 21:7 22:13 26:7 35:19 38:16 38:20,22 47:13	authorized 62:5	brown 2:8,10 60:25 60:25
accepting 60:9	allocation 44:15,16 50:19 51:13,18,20 52:3,5,22 53:23,25 57:5 58:20	applications 6:23 20:19 21:1	availability 5:20 6:15 7:3,5,18,24 8:4 11:9,25 14:10,11 15:20,22 16:23 17:21 18:6 21:1 22:3 23:2 24:3 25:18 41:3 44:19 44:21 49:11 50:9 51:21 52:10,14 53:18 54:9 56:14 56:15,17 57:1,12 57:22 58:20 59:7,9 59:13,14 60:4,10	build 15:5 22:6
accomplished 10:3	allow 16:8 28:23	apply 62:14	available 9:24 10:13 18:10,11 21:6 26:12 28:9 39:14 48:15,22 49:10	building 13:17 22:6,8 27:20,21 50:2,5,13 51:7,16 53:10 56:13 57:9 58:13 58:18
accurate 8:15,17 32:13	allows 40:5	approached 6:22	avenue 18:22,23 60:21 65:14	buildings 13:19 16:12 46:1
accurately 61:4	alternative 22:17 26:22 27:11,17 35:14 36:2 37:3 40:4 41:15 42:14 43:17,23,24 44:20 44:21 46:24 48:6 49:4,14,16 50:23 50:25 52:11 54:13 54:16 55:5,7 60:6	approval 6:13 21:18 23:3 27:17 31:4 53:6,13	average 30:5	built 60:17
acronym 9:19	alternatives 44:4	approvals 27:19,21 31:3 56:20	aware 27:9,11	burt 2:13
acronyms 38:5	amount 32:12	approve 23:7 28:5 38:11 50:5,12,13 52:12,13 56:9,14		business 5:5,14
action 9:8,17 24:7 30:8 40:20 62:12 62:13	analysis 41:22	approved 41:17,20 50:6,8 51:10,19 53:4 58:18,19 60:17	B	bypassing 10:11,11
actual 11:13 50:2 51:7 57:5	answer 21:6 48:13,20	approves 23:5 33:7 38:12 53:7 56:11	b 3:9	
add 49:14	answered 29:18,25 40:24	approximately 10:1 32:14 46:6 60:14	back 34:19 38:25 43:17,22 46:22	C
adding 47:7	anticipate 19:12 45:20	april 1:14 19:13 62:18 63:7,10,16 65:1,6	ballpark 35:12	c 4:1
additional 28:12 39:25 64:5,6	anticipation 18:4	area 5:11,21,23 11:12 13:6 29:6 31:12 32:2,20,23 41:7,9,11 54:20	based 8:4 9:11 55:4	calhoun 2:4
address 4:11 9:8	anybody 4:21 60:24	areas 5:24 11:11	basically 20:16 32:13 40:5 47:21	call 9:5 16:14 17:14 20:13,13 21:9,10 28:4 43:12
addressed 7:9 11:18 13:24 15:12	anyway 20:4 47:11	arrangements 65:9	bear 52:1	called 4:16 30:6 45:16 47:12
administrative 1:1 27:5	apartment 6:10 9:25 14:11 46:3	asked 20:3 21:4 34:15 44:3	begins 41:2	canal 43:2
admissions 20:19	apartments 1:9 2:2 4:17 12:14 13:17 13:25 14:18 15:13 15:25 18:8 54:2	asking 20:2 53:6	behalf 2:2,7,12	cant 53:19
advance 17:23	apparently 39:6	associated 54:3	believe 7:11 16:16 17:9 41:5,21 43:18 44:16 60:1	capability 12:10
aerial 45:25	appearances 2:1	assume 36:14 41:12 41:13 46:2	beyond 9:16 57:21	capacity 21:6,24 22:12,20,21 26:11 26:20 28:22,23 29:2,3 39:14,19,21 40:1 41:3 44:3,24 45:5,6,11,14,18 48:3,11,17 52:9,10 52:10,19,24 53:1 53:14,15 54:5 55:3 55:8
affirmatively 55:16		assuming 34:3 36:13 48:21,23	bit 60:19,20	care 5:8
affordable 16:23 18:1		attach 10:8 64:5	block 18:25 46:20	carlton 2:13
agencies 23:10,21,24 31:3 53:11		attached 5:25	blocks 18:22 31:13 32:9 34:9 35:1 46:12 55:17	case 1:2 12:7 43:14 65:7
agency 9:18 38:7		attention 10:16		castellon 37:20
agree 25:23 28:10 31:14 32:15,18 39:11 56:18				caveat 41:21
agreed 3:21 47:21				center 10:11,21,25 19:24 20:15 40:8 40:11 45:12
agreement 6:16,18 24:4 34:2 39:1 44:18 50:18 51:15				certain 9:12,16 33:20 41:23 46:19 54:3

55:25	conclude 39:20	control 33:9,14 62:16	crossexamination	17:18
certainly 36:4 45:1	concluded 61:14	convenient 44:13	3:4 19:19	departments 38:4
45:10 51:9 54:24	conditional 9:4,16	conveyed 51:11	current 20:22 46:6	52:18
certificate 3:5,6 62:1	29:21 30:1,9 40:19	cooperation 65:16	currently 9:4 29:3	depending 46:16
63:1	confirm 26:19 27:6,7	coordinate 33:12	customary 46:10,14	depends 35:3 44:5
certification 39:14	confirms 26:5	copy 7:12 16:17	46:15	45:21 52:23
39:19 62:14	conformation 26:18	corp 64:2 65:4	customer 17:6	deponent 3:24
certify 62:4,10 63:6	confused 49:24	corporation 1:6 2:8	customers 5:8,10	deposed 47:19
cfjblaw 2:15	confusing 20:9	6:20 18:3 20:25	cycle 9:14 18:2 41:2	deposing 45:7
challenging 20:16	connect 13:1 15:8	25:14,17,19 47:17	41:6 59:6	deposition 1:13 7:8
changed 17:3	17:16,17,18 18:16	60:8	cycles 17:24	10:20 11:17 13:23
changes 38:5 64:4,7	29:9 42:24 44:8,11	correct 22:25 23:1		15:11 29:14 61:3
64:22	45:2 50:10 51:9	24:23 25:9,10,21	D	61:14 62:6 64:3,7
cheaper 12:24 43:9	53:19,19,20 55:2	25:21 26:20,22,23	d 3:1 4:1	64:21 65:7
circumstance 46:16	57:3 58:17 59:4	28:4 29:8 30:23	dade 23:23 32:20	depth 12:19 42:23
circumstances 13:2	connected 30:17	31:4,9 32:2,10,11	44:14	derm 9:17,21 23:11
city 11:15 18:22	62:12	33:2,16 34:5,10,13	dangerous 36:24	23:15 38:4,6,7
31:13 32:9 33:10	connecting 12:17	34:14 36:2,22,23	date 1:14 18:10 64:5	40:14 44:15,16,21
34:9 35:1 46:12	23:9 28:21 29:1	37:4,5 38:17,18	dated 7:9 11:17	45:4,8 50:19 51:14
clear 4:23 19:7 55:12	42:1,3,6 45:13 53:8	39:7,11 40:16	13:24 15:12 16:5	52:5,6,12,13,22,23
55:13	57:19 58:2	43:24,25 45:5,19	62:18	53:13,24 57:6
close 33:23	connection 8:2,6	46:7 49:17,18 52:8	dates 39:15,15	58:20,23 59:10,12
closed 59:2	12:13 13:8,10 16:6	52:12 53:23 54:16	day 28:3 56:7 62:18	59:18,21
closely 20:24	16:9 17:15 18:7	55:5,6,8 57:13 59:7	days 57:12 65:10,12	derms 58:21
closer 18:19	27:3 35:17 38:24	60:2,3 64:21	deadline 21:7 22:13	described 57:25
closest 42:21,21	42:22 43:14,20	correction 64:8	26:6 38:16,20	designed 20:4
club 11:18 13:12	44:6 46:13 53:23	corrections 64:5	deal 7:2 21:1 47:11	despite 9:23
34:16,17,20 42:8,9	54:14,21 55:22	correctly 33:20	dealing 34:21	detail 45:25
42:12,13	56:2 59:16	55:25	deals 7:4	determination 23:25
code 56:13 57:9	connections 39:15,25	cost 35:9,10	dealt 40:25	55:3
collection 13:19 40:8	connects 28:6	counsel 3:23 62:11	dear 65:5	determine 8:2 53:25
43:7	consent 23:22 24:6	62:12	december 39:16	54:5 55:16,20,21
com 2:5,15	consistent 25:12	country 56:6	decide 61:6	determined 8:3,6
come 6:14 7:4,23 8:1	construct 15:8 22:10	county 5:3,5,12 6:4	decided 57:4	54:9
18:4 20:23 21:2	22:11 50:24 51:24	6:10 8:10,20 12:1	decision 34:20 42:15	determines 45:5
38:25 43:17 44:18	constructed 34:4	16:14 23:5,21,23	decisions 35:4,6	47:17 53:22
47:5 54:1 56:23	37:4 49:16	25:7 32:21 38:2	declare 64:21	develop 6:9,16 11:10
comes 8:3	constructing 27:20	39:10 40:2 44:14	decree 24:6	50:25
commission 63:16	38:13	47:5 57:20 58:22	deep 12:22 42:23,24	developed 8:5 32:24
common 17:19	construction 22:9	62:3 63:3	denied 36:6	developer 5:17 6:9
communicate 59:10	27:4 28:1 30:21	countyowned 13:21	dense 32:20	6:12 7:25 10:6
compare 42:9	34:8 35:15 36:1	18:17	density 32:22	11:10 12:16,21
complete 49:23	51:3,6 52:22	couple 18:25 19:1	deny 36:8 44:21	13:18 16:9,15
50:24 56:21 65:10	consult 23:25	24:8 29:17 57:18	dep 23:19	17:16 18:15 22:4
complex 6:10 9:25	contact 54:24 65:9	course 18:2 45:20	department 5:4,6,19	24:3,4 27:24 33:8
14:11 29:7	contents 16:5	court 4:23 7:7 9:20	9:21 10:9 17:12	35:5 36:4 37:2
compliant 13:8	contract 5:14	13:23 15:10 21:14	21:9,12 23:13,18	38:25 40:5 43:10
component 56:13,13	contractor 36:15	61:3,10	23:19 24:5 27:21	43:12,15 44:18
computer 31:18	50:17 51:4 52:15	covenants 6:1	30:4,13 33:14 36:8	46:20 50:18 51:15
concept 13:12 47:11	55:22	create 40:15	38:9,12 50:13 53:7	52:7,21 54:25
47:12	contractors 35:23	criteria 26:8	53:10 54:10 58:16	56:24,25 57:19
concerning 21:24	50:4	cross 36:18	departmentowned	developers 5:17,20

6:23 17:19 18:4 21:2 34:7 40:25 44:12 60:11 developing 5:21 development 9:1 12:13 18:4 22:13 26:13,25 27:4 28:9 28:13,17 29:8 32:23 34:4,22 37:20 40:4 41:24 45:18,19 46:11,13 50:2,3 54:1,15 57:19 developments 7:6 dewater 42:25 dewatering 43:3 didnt 31:17 49:15 different 5:22 26:8 35:5 differently 58:25 dig 33:13 58:7,11 digging 56:3 direct 3:3 4:7 62:16 direction 62:16 directly 10:10 40:11 45:11 dirt 57:10 discuss 12:15 discussion 42:20 distance 12:19 34:22 43:5 46:17 division 1:1 40:14,14 doah 1:2 document 25:4 37:9 documents 5:24 24:9 31:19 doesnt 25:7 50:23 56:16 doing 20:15 25:20 43:13 55:25 domestic 5:7 donaldson 2:13 3:4 19:20,21 21:16,17 24:12,18,21 25:3 31:22,25 32:17,19 37:9,16 48:18 49:13 53:12 55:11 55:14 57:14 61:1 donated 5:19 dont 9:19 19:16 20:10,24 22:4,8 23:7,12,19 27:21	28:12 29:3 32:5,12 33:11 35:4,6,22,24 35:25 36:7 37:5,18 41:9,10 44:24 45:25 46:18 47:16 50:17,20 51:17 52:15 54:11,23 56:11,16,19 59:18 60:7 douglas 1:13 3:2 4:3 4:11 62:6 63:6 64:3 64:24 65:2,25 downhill 9:3 40:9 downstream 10:5 draft 5:17 6:15,17 54:24 drafted 30:1 due 12:13 duly 4:4 63:7 duties 5:15 <hr/> E <hr/> e 3:1,9 4:1,1 64:1,1,1 earlier 32:2 38:15 earlington 13:25 14:16,18 15:3,13 15:24,25 18:8,19 18:24 19:1,9,10,11 24:15 60:16 earth 60:14 easily 43:12 eastwest 36:20 economic 30:14 35:4 38:1 40:13 economical 44:13 economically 12:20 12:20 ed 23:25 ee185242 63:16 eightinch 9:2 either 25:15 40:8,21 51:14,22 52:17,20 53:20 email 61:13 employed 4:25 5:2,3 employee 47:20 62:11 engineer 8:1,6 17:10 17:11,15 34:21 36:21 39:6 40:17 42:16,17 45:8 engineers 12:8,15,18	13:6 29:25 41:23 54:17 55:16,20,21 59:15,19 entail 33:25 enter 64:4 entered 64:22 entities 24:6 27:19 entity 23:5 33:9 environment 9:21 environmental 23:13 23:21 38:1,8 errata 3:6 65:13 especially 36:17 esquire 2:3,8,13 essence 54:12 essentially 9:9 13:18 16:10 establish 53:15 eventually 9:3 everybody 7:11 examination 3:3,4 4:7 57:16 examined 4:5 exceeds 9:10,13 30:6 40:22 exhibit 3:10,11,12,13 3:14,15,16,17,18 7:8,13 8:8,15 9:25 10:17,20 11:17,19 11:22 13:24 14:1 14:25 15:11,14,17 16:3 24:24 29:14 31:23 37:11,13 59:25 60:13 exhibits 11:2,5 existence 55:4 existing 16:12 45:18 45:21 expensive 42:24 experience 13:3 17:19 46:9 47:10 expires 63:16 explain 29:22 expressly 3:24 extensions 27:2 extremely 55:1 <hr/> F <hr/> facilities 5:18 6:17 13:5 38:14 51:6,9 fact 7:18 17:23 38:3 46:22,24 50:23	53:8 fair 21:3 25:21 fairly 32:4,5,20 familiar 6:19,21 7:16 8:7 11:5,13 12:2 14:4,12 15:17 16:21 20:20,22,23 31:12 32:2 37:1 38:2 far 20:25 38:13 faster 12:24 feasible 12:20 federal 23:24 24:6 fees 27:2 feet 18:25 19:1 32:14 32:16,17 35:10,17 35:17 41:19 42:23 48:9,9 56:22 60:15 60:15,18 fhsp 26:6 fields 2:13 final 31:1 finally 19:12 finance 1:6 2:8 6:20 18:3 20:24 25:14 25:16,19 47:17 60:8 64:2 65:4 financially 62:13 find 46:21 fine 20:7 21:13 37:8 53:11 55:11 finish 35:21 finished 37:23 firm 4:14 first 4:4 10:19 16:5 21:7 26:11 39:9 firsthand 37:5 fits 34:16 five 31:13 32:9 34:9 35:1 46:12 54:23 55:17 fixing 47:7 fl 3:16 flippant 54:11 flooded 41:2 florida 1:1,6,16 2:5,7 2:8,10,14 4:12,15 6:19,24 7:10 17:23 18:2 19:22 20:17 20:21,24 23:18,19 25:8,14,16,19 41:2 47:13,17,20 59:25	60:6,7 62:2 63:2,6 63:15 64:2 65:3,4 65:15,19 floridahousing 2:10 flow 9:2,3 14:19 16:11 30:16 39:25 53:25 54:3 flows 40:9 45:11 focus 8:19 focusing 31:6 folder 16:4 folks 4:19 19:17 follow 6:12 21:4 following 64:7 follows 4:5 followup 20:2 followups 57:18 fool 20:4 footage 46:3 54:4 force 10:8,9,9 12:10 12:11 13:1,21 15:8 15:9 17:17,18 18:16,17 19:6,8 22:18 23:9 28:6,21 29:1,2 33:3 40:2,12 41:22,25 42:1,2,6 43:8,19 44:11 45:2 45:3,11,13 46:21 48:15,22,24,25 49:9,12 50:11 51:23 52:16 53:2 53:20 54:8,22,25 55:2,16,21,23 56:3 59:5 60:20 foregoing 62:6 form 24:19 25:12,15 25:22,24,25 26:4,6 26:16,18 48:12 52:15 53:5 55:9 59:24,25 60:6,10 64:22 forms 25:9 60:2 fort 65:14 forward 52:7 57:4,8 four 26:7 fpr 1:17 62:4,22 63:5 63:15 frank 39:22 44:25 45:7 59:20 frequent 16:22 friday 63:9 65:10 front 60:8
--	---	---	--	---

fully 32:24	32:13 60:14	hold 37:12	infiltration 47:8	16:1 18:18 22:5,6
furnished 65:12	governmental 33:9	hook 22:14,16,18	information 6:24	23:7,12,19 28:12
further 12:17 18:19	grant 31:4	48:2	39:2 57:7 59:18,19	32:5,12 33:18,19
18:21 19:2,5,8,16	granted 41:14	hooking 34:21	59:23	33:21,24 34:1 35:9
40:9 60:20 62:10	grants 44:14	hookup 27:2	initial 9:5,7,15 15:21	35:13,23 36:7,15
<hr/>	gravity 8:25 9:2 10:4	hourly 9:13 30:6	29:20,23,24 30:1,3	36:16,19 37:23
G	10:11 12:9,17,21	40:22	40:21 43:21	38:4 39:3 40:18,25
g 4:1	14:19 28:20 29:9	hours 9:12,16 65:10	initially 6:14 43:18	41:12 42:18 44:7,8
gain 6:13	30:16 40:8 42:22	housing 1:6 2:7,8	inspect 33:17	44:11,24 45:7,24
generally 6:19 59:14	43:13 44:7 48:16	3:16 6:20,24 11:10	inspected 56:5	45:25 46:16,18
geographic 5:11	49:12 50:10 51:22	16:23 17:23 18:1,3	inspectors 55:24	47:5,16 49:15,24
getting 49:21 54:18	52:17,20 53:19	20:21,24 25:8,14	install 5:18 10:7	50:7,17 51:2,12
55:10	54:6,20 58:3,4,9,12	25:16,19 41:2	12:21,25 17:17	52:13,15,16 53:9
give 9:19 10:6 24:12	58:12,13,14	47:13,17,20 59:25	18:15,16 33:15	54:1,22,23,23,25
44:12 57:6	ground 33:12,15,19	60:6,8 64:2 65:4	35:9,10 51:5 55:23	56:1,1,11,19 57:5,9
given 12:19 43:12	35:24 38:8 47:8	housings 20:18	installation 27:2 28:1	58:11 59:18,20
gives 44:16 52:23	49:21 50:7,15	huge 18:1	31:8,13 32:6 33:17	60:4,16 61:8
glazer 2:3 3:3,4 4:8	group 2:12 4:15 7:10	hugh 2:8,10 60:25	34:10 35:16 41:19	knowledge 21:21
4:13 7:7,15 10:16	16:18,19,22 19:23	hundred 18:25,25	46:11 56:11,21	28:8,15 37:5
11:4,16,21 13:22	guarantee 27:23	19:1	installed 36:10 37:3	<hr/>
14:3 15:10,16	41:18 53:3	<hr/>	51:10	L
19:16 20:10 21:4	guaranteed 27:13,14	I	installing 27:24	I 3:20
21:14 24:8,11,14	27:17	idea 35:8,10,12,20	intended 60:5	lack 40:6
24:20,23 25:1	guarantees 27:22	identification 7:14	interact 59:22	land 6:16
31:18,21 32:16	guess 33:8,10 37:10	11:3,20 14:2 15:15	interacted 16:24	largest 56:5
37:12,15 48:12	47:16 55:17	24:25 31:24 37:14	interaction 59:12	lateral 58:13
53:5 55:9 57:17	guessing 33:11	identified 8:8,23 9:25	interested 62:13	latest 20:18
60:22 61:2,7,12	<hr/>	11:14 12:3	intervenor 1:10	lauderdale 65:14
glazers 29:19 40:24	H	ill 4:17,20 20:11	involved 6:23	law 4:14
go 13:19 20:11 28:7	h 3:9 64:1	34:19	involvement 34:2	lawyer 6:7 19:22
29:13 33:1,3,4,8,13	halfway 18:24 25:22	im 10:24 19:5 20:2	isnt 32:21	36:22
34:19 35:1 36:18	26:3	22:3 23:17 48:21	issue 9:9 58:23	layout 13:5
37:2,10,15,18	hand 63:9	49:2,6	issued 52:5	lead 36:11
43:11 50:4,12 53:9	handle 42:5	imagine 45:7 58:24	issues 38:8 43:3 52:4	leading 17:7
56:2 57:4,8 58:6,8	handwriting 17:10	60:7	ive 24:11,17 46:19	leave 23:20 36:25
goes 9:14 21:5 30:9	handwritten 16:16	impediment 45:13	<hr/>	56:2
31:7,13 33:1,6	17:5,9	impediments 26:25	J	led 16:1
39:13	happened 16:1 43:16	27:8 36:1,3	j 2:3	legal 30:25 31:2
going 6:9 7:7 8:5	happens 34:1	implements 40:15	jason 16:20,22	lejeune 1:16 4:12
10:16,17,24 11:16	hear 20:6,7	important 47:12	jazzmin 1:17 62:4,22	65:2
13:22 15:10 16:8	hearing 28:8	impractical 42:18	63:5,15 65:19	length 32:6
20:2,13 21:9,10	hearings 1:1 28:13	improved 47:2	jorden 2:13	letter 3:7,10,11,12,13
22:10,10 23:23	heavily 56:4	inch 42:3	jurisdiction 28:11	3:14,15,18 6:14,15
26:4 30:14 33:1,19	heights 18:24 19:9	include 44:4	<hr/>	7:9,18,21,23 8:3,23
33:22 36:19,20	hereto 3:22	included 43:24	K	10:20,22,25 11:17
41:20 45:22 46:22	hes 25:1 39:6	including 24:6	keep 4:22	11:25 12:3,5 13:12
47:10 50:22 52:1	hesitant 28:18 29:5	increase 16:10 30:16	ken 47:20	13:13,24 14:4,8,10
53:25 57:8	hesitation 37:6	45:16 59:3	kind 21:5 23:23	15:1,12,19,20,21
goldfarb 16:20	hey 43:13	indicated 20:20	29:18 34:16 50:21	16:2,2,5,14,17 17:4
good 4:9 20:5,9	high 32:22	42:13	50:22 57:24	17:5,8 18:10 21:1
52:20 57:11	hire 33:24	indicates 12:5 29:20	kinds 17:24	21:23 22:3 23:2,22
google 3:17 31:16,19	historically 25:7	individual 9:11	know 4:19 5:24 13:6	24:3,16 25:15

27:12,12 29:15,19 30:11 31:7 32:7 37:19,25 39:9,22 40:1 43:11,21,22 43:23 44:4,17,19 44:20 46:23 50:19 51:14 52:3,5,6,22 52:24 53:14,17,18 55:4,18 56:10,14 56:15,17 57:1,11 57:12,22 59:3 60:4 65:12,14 letters 5:20 7:5,24 11:8,9,14 16:23 17:20,25 19:24 25:11,18 41:3 57:6 59:7,9,13,14 60:9 lezcano 37:19 39:3,4 39:22 44:25 59:20 lezcanos 58:16 lieu 60:10 limited 15:13 line 12:22 27:2 36:12 46:12 64:8 linear 32:15,17 35:10 35:17 41:19 48:9 56:22 60:15,17 lines 36:13,14 64:5 list 46:25 listed 55:18 lists 26:7 literate 31:18 little 55:10 60:19,20 llc 1:2 10:21 11:18 13:25 loa 18:2 local 24:5 28:8 33:14 58:6 located 8:10 location 6:10 8:7,12 12:9 14:12 locations 11:13 12:2 long 6:2,4 30:25 35:13,20 49:15 50:16 59:2 longer 46:17,19 longest 46:18 look 13:7 31:16 34:19 37:19 looked 12:8 16:5 19:25 looking 35:14,15,16	37:6 60:13 looks 25:25 31:11,12 lot 17:24 32:23 39:1 43:3 57:7 luis 37:19 <hr/> M <hr/> m 1:15,15 61:15 65:10,10 main 10:8,9,10 12:10 12:12 13:1,21 15:8 15:9 17:18,18 18:16,17 19:6,8 22:18 23:9 28:6,21 29:1,3 33:3 34:13 34:22 35:18 40:2 41:22 42:1,7 43:8 43:19 44:11 45:2,3 45:14 46:13,21 48:15,22,24 49:1,9 49:12 50:11 51:23 52:17 53:2,20 54:8 54:22,25 55:2,16 55:21,23 59:5 60:20 mains 40:12 42:2 45:11 56:4 making 59:15 management 9:22 manhole 12:23 42:21 42:24 map 3:17 31:17,19 60:14 mariner 11:18 13:12 34:16,17,20 42:8,9 42:13 mariners 42:12 mark 7:8 10:17,19 10:24 11:16 13:23 15:11 24:20 37:10 marked 7:13 11:1,2 11:19 14:1 15:14 24:24 25:2 31:21 31:23 37:13 59:24 matter 32:25 54:18 65:16 maximum 47:4 mcmullen 2:3 4:14 mdonaldson 2:15 mean 9:6 13:4 25:16 32:5 33:23 35:3,22 36:3 40:18 41:10	41:18 44:24 46:15 47:16,18 49:22,23 54:11 means 47:15,22 62:15 mention 46:24 mentioned 30:13 56:10 mentions 27:13 met 31:1 method 53:7 mglazer 2:5 miami 1:16 4:12 65:3 miamidade 5:3,5,12 6:4,10,11 8:10,12 12:1 14:15 16:14 17:12 23:5 25:6 38:2 59:12 60:1,5 62:3 63:3 michael 2:3,13 4:13 19:21 mike 20:3 24:13 55:10 mile 43:2 54:14 miles 54:23,23 55:2 minute 30:15 mistake 19:6 modify 50:1 monday 65:10 moratorium 9:4,5,7 9:9,9,14,15,17,23 10:5,6,12 14:24,25 15:4 16:8 28:19,19 28:20,23,25 29:4,6 29:9,10,11,20,21 29:23,24 30:1,2,3 30:10,22 39:11,23 39:24 40:4,16,19 40:21 41:8 45:2,12 46:25 47:1 48:1,3,5 48:16,23,25 49:3,6 49:7,8 54:6,7,12,19 59:1,2,17 moratoriums 28:15 morning 4:9,18 mouth 34:19 move 52:7 multiple 17:1,2 municipal 5:22 56:12 municipality 28:11 36:7 58:6	<hr/> N <hr/> n 3:1,20 4:1 name 4:9,11,13 16:18,19,20 21:11 38:3,5 65:14 napot 30:6 40:22 47:2 nearby 12:9 nearest 40:3 necessarily 41:17 53:23 necessary 47:6 59:12 65:7,9 need 5:18 23:24 31:3 38:21 39:1 43:5 45:18 51:17,21,24 52:6,9 53:13 58:15 59:10 61:12 needed 6:17 12:6 net 16:9 45:16 59:3 new 5:14 38:3 39:25 45:17 nine 37:12 nominal 30:5 47:2 normally 14:16 north 2:9 58:5 northern 44:9 northsouth 36:19 northwest 18:22,23 55:23 60:21 nos 1:2 notary 1:18 63:5,15 65:19 note 17:5 noted 64:7 notes 16:16 17:9 34:19 37:7 52:1 62:9 notice 9:15 18:6 65:6 notices 30:4 notify 24:4 november 7:9 8:15 9:23 13:24 16:2 17:4,8 18:9 21:19 22:22 28:22,24 29:14 39:21 46:23 48:19 52:25 53:16 53:16 56:9 number 9:16 15:12 18:1 24:22,23 26:19,24 28:7,14 29:14 54:3	<hr/> O <hr/> o 3:20 4:1 oath 3:6 4:5 63:1 obama 49:24 object 48:12 53:5 objection 55:9 obtain 51:13 52:21 obtaining 26:25 obviously 20:9 56:23 60:9 occasions 17:1,2 october 10:20,25 11:17 15:12 16:2,6 16:13,17 17:4 39:16 offered 34:18,25 43:19 office 22:7 46:2 54:2 64:5 65:9,10,14 officer 5:14 official 38:5 63:9 oh 13:4 okay 4:24 6:22 7:21 8:17 9:19,21,23 19:12 20:1,8 21:12 21:22,24,25 22:12 22:20,24 23:16 24:14,18,20 25:6 25:11,21 26:3,24 27:10,23 28:3 29:16 30:11,20 31:6,16 32:1,4,9,20 32:25 33:6,16,21 34:3,8,15 35:8,13 37:6,17,23,25 38:11,19 39:3 41:7 41:12,13,15 42:11 43:21 45:24 46:5 48:9,10 49:6,8,14 50:1,18,21 51:12 54:11 55:2,11 61:9 old 38:5 opalocka 11:15 operate 9:13 operates 40:18 operating 9:10 30:5 47:3 option 10:6,13 12:16 15:6 17:16 42:13 43:10,13,15 53:21 54:8 59:1,4 60:11 options 35:6 44:7,12
--	--	--	--	--

order 23:22 24:14
37:2
org 2:10
organization 6:21
outside 11:11 28:11
oversees 38:7
owner 30:16

P

p 2:13,13 3:20 4:1
65:10
package 26:11
page 64:8
pages 62:8
paid 27:3
paragraph 8:19,22
24:1,2 30:12 39:9
parcel 6:16
part 12:1 35:25 44:9
44:9
participate 35:25
particular 4:16
12:10 13:15,16
24:14 33:10 40:22
41:5,7,11 54:1,20
parties 3:22 62:11
path 33:1
payment 27:2
penalty 64:21
people 59:21
periodically 6:22
perjury 64:21
permission 33:13
permit 50:5 51:13
52:21 58:15
permits 49:22
permitted 49:16
permitting 35:19
personally 63:6
persons 54:4
perspective 52:18
pertaining 28:15
petitioner 1:4
phase 10:21,25
phone 4:20,21 7:11
10:22 19:17
pile 1:13 3:2 4:3,11
4:13,25 6:9 7:16
11:5 19:12,21 24:8
25:4 29:13 32:1
36:21 37:7,17 47:9
52:1 56:8 57:18

60:22 61:2 62:6
63:6 64:3,24 65:2,5
65:25
pinnacle 1:2 64:2
65:4
pipe 32:6,15 33:1
35:11,17 36:20
41:19 56:22 60:15
pipeline 34:10
pipes 4:22 31:8,13
33:11,15,19 35:9
35:24 36:5,19 47:8
place 1:16 15:5 29:6
41:8 48:5 54:12
placement 36:8
plan 9:8,17 30:8 38:1
39:1,6 40:20
plans 21:8,18 22:5,8
22:8,9,24 23:1,8
36:16 38:11,13,16
50:6,6,8,12,14
51:18 55:19,23,24
56:16,16 57:6
58:18,19
please 4:9 17:6 24:13
24:21 31:22 64:5
65:6,9,13
plus 43:1
po 2:4,14
point 12:12 13:8 16:6
40:20 42:22 43:14
45:10 54:14,18,21
55:22 56:1
points 8:2,5 17:15
18:7 38:24 44:6
53:22 54:9 59:16
police 33:14,24
pollution 38:8
portions 51:3
position 5:16 6:2
46:6
possible 54:17
potable 5:7
practical 35:1 42:14
42:19
practicality 34:21
preferable 12:21
preliminary 56:15
president 37:20
49:24
pressure 41:22,25
pretty 32:22 42:2

61:7
prevent 47:8
previous 20:21
previously 41:1
prior 21:19
private 10:7 12:5,25
13:11,15,18,20
15:7 17:6,17 18:15
21:19,23 22:2,19
22:25 23:3,6,8,11
23:20 26:21 27:13
27:14,18,25 28:2,5
28:20 29:1,12
30:22 31:5,6 33:2
34:3,6,9 35:15 37:3
41:24 42:4 43:6,6
43:19 44:10 46:10
46:15 49:3,7 50:11
51:23 52:16,19
53:1 54:14,21
56:10,12,21 57:25
58:22,25 59:4
probably 23:11 43:2
46:19
problems 42:6
procedure 33:22
procedures 20:25
proceed 47:12,15,21
47:23
proceeding 19:23
proceedings 27:5
process 6:12 20:18
20:19 35:25 47:13
50:5
processed 65:13
processes 20:21 37:1
processing 5:8
prohibit 29:1
project 8:4 10:4,14
12:1,6,8,11,14,22
13:4,15,16 14:13
14:16,17,18,22
15:7,21,23 16:4,10
18:9,10 19:8 30:21
35:2,3 38:23 39:2
47:22 49:19,22,23
57:4,7 58:3 60:16
projects 6:24
proper 13:8
properly 51:10
properties 8:8,22
property 5:21 12:25

30:17 33:2 34:7
43:7 44:6,9,10
45:21 51:1
propertys 9:1
proposal 26:7
proposed 7:6 8:25
16:11 26:12,25
28:9,13,16 29:7
40:3 45:17
proposing 6:25
protection 23:14,21
provide 5:7 15:4
38:10 43:15 46:10
48:17 49:11 53:17
provider 25:24 26:5
providing 17:16 26:1
public 1:18 33:2,4,6
33:12,22 36:5,7,9
49:8,9 53:9 57:9
58:6,24 59:1 63:5
63:15 65:19
publiclyowned 58:12
pulled 16:4
pump 8:21,24,24 9:3
9:10,10,11 10:5,7,7
10:12 12:25 13:15
13:20 14:15,19,21
15:7 16:7 17:6,17
18:15,19 19:2,6
21:19,23 22:2,19
22:25 23:3,6,8,11
23:20 26:21 27:13
27:14,18,25 28:2,6
28:21,25 29:2,3,12
30:4,5,6,21,22 31:5
31:7 34:3,6,9 35:15
37:3 39:10,23,23
39:24 40:3,5,5,10
40:23 41:9,18,24
41:25 42:4 43:6,19
44:11 45:6 46:10
46:15 47:2,3,7,7
48:7 49:3,7,8 50:11
51:23 52:16,19
53:2 54:14,21
56:10,12,21 57:20
57:25 58:22,22,23
58:24,25 59:1,2,4
59:17
pumped 13:20 40:9
pumping 8:20 12:5
13:11 40:10

purpose 14:8
purposes 19:23 48:6
put 24:2 33:11 35:24
36:5 45:22 49:20
50:7
putting 34:18 50:14
57:9

Q

quarter 43:2
question 20:8 21:5
29:19 48:6 55:15
questions 4:17 19:16
20:3,3 21:4 30:15
34:15 40:24 47:11
50:22 56:8 60:25
quote 26:4

R

r 2:8 4:1 64:1,1
rarely 59:21,22
rate 9:13 30:6
rated 9:11 30:7
rating 9:12 40:22
read 3:7 25:22 61:3
64:21 65:9,13
reading 3:23 64:7
ready 15:5 30:21
42:4
really 50:22
realm 47:10
reason 44:25 45:1
reasonable 47:25
recall 41:4,8
receive 16:14 39:25
receiving 8:24
reception 20:5
recognize 11:22
16:18,19 17:10
recollection 41:11
reconfiguration
36:12
record 4:10,22 19:7
62:8
redirect 3:4 57:16
reduced 47:3
reecy 47:20
referenced 8:21
13:11,12 14:24,25
references 10:23
referencing 7:19
referred 8:1

<p> referring 15:23 regard 18:8 57:25 regarding 8:20 22:9 24:1 38:23 40:17 regulate 23:10 28:1 58:24 regulated 27:18 56:4 regulates 23:20 58:23 regulation 25:17 regulations 13:9 20:25 24:5 28:1 60:8 regulatories 24:2 regulatory 9:18 23:10,24 24:7 30:14 37:25 38:7 40:13 45:9 53:10 related 2:12 11:18 16:18,19,22 19:22 relationship 38:6 relative 62:10 releases 6:1 relevant 8:22 remedial 9:8 40:20 remedy 30:8 remember 34:23 remove 48:3 repetitive 55:10 rephrase 20:12 replacement 45:23 report 62:5 reported 1:17 reporter 3:5 4:23 7:8 9:20 13:23 15:11 21:14 61:4,10 62:16 reporters 62:1 reporting 65:20 represent 4:15 32:4,6 47:19 reproduction 62:15 request 20:18,19 26:6 56:24 requested 62:7 requesters 16:22 requests 17:24 18:2 20:23 41:3 require 28:12 46:11 59:22 60:17,19 required 8:5 23:4 28:8 56:20 64:5 </p>	<p> requirements 31:1,2 requires 25:15 requiring 13:9 reserved 3:24 resource 9:21 40:13 resources 30:14 38:1 respect 12:9 respective 3:22 respondent 1:7 response 20:17 responses 29:19 responsibilities 5:15 responsible 27:24 rest 38:23 retail 5:7,9 22:7 46:2 54:2 retain 38:4 return 64:5 65:14 review 38:1 39:7 56:16 62:6 reviewers 55:24 reviewing 55:19 revise 17:6 43:14 revision 17:14 revisions 17:20 richman 4:15 7:10 right 7:2 13:22 14:8 16:13 19:17 22:3 25:1 28:5,14 32:23 33:4,6,22 34:6 36:5 36:9,11,21 40:7,15 45:16,22,24 47:19 48:19 49:4 52:11 57:12,14 58:2,17 59:24 61:2,5 65:13 rio 1:2 64:2 65:4 road 1:16 4:12 33:10 33:10 65:2 roads 12:18 33:23 role 6:12 58:21 roughly 32:9 34:9 59:6 routine 27:4 rudg 37:20 rules 13:9 run 13:2 43:4 46:20 55:2 58:13 </p> <hr/> <p style="text-align: center;">S</p> <p> s 3:9,20,20 4:1 64:1 sanitary 10:8 saw 52:2 </p>	<p> says 16:10 17:5 26:4 30:15,25 scale 32:13 scope 38:23 seal 63:9 second 37:12 section 38:1 39:7 secure 27:19,20 see 13:7 14:23 26:9 26:14 30:1,18 31:19 35:7 37:21 39:17 46:1,1 seek 17:20 seeking 6:24 11:10 14:11 seen 25:4 37:18 46:18,19 sent 24:8 37:10 43:11 sentence 39:14 sentences 30:13 septic 26:12 serve 5:23 13:16 14:16,21 served 6:11 8:12 serves 54:20 service 5:21 9:24 11:11 12:25 18:9 25:24 26:2,5 27:1 28:9,16 29:11 38:10 services 6:13 sewage 5:9 8:20 10:8 10:10,10 40:7,11 sewer 5:4,6,18,19 6:5 6:11,13,17 7:3,5 8:13,25 9:2,24 10:4 10:9,11 11:11 12:10,11,17,21 13:5,10 14:11,15 15:4,9 16:7,8,11 17:12 18:5,9 21:10 21:19,24 22:12,14 22:16,21 23:25 26:1,11,20 28:22 29:11 30:4 34:2,13 34:22 35:18 38:9 38:12,13,13 39:14 39:19,20 40:1,2,8 41:3,3 42:16,22 43:13 44:3,8,8,14 45:5 46:12,13 48:2 48:3,11,17 49:11 </p>	<p> 50:9 51:3,5,9,18,20 51:21,22 52:9,9,10 52:14,18,19,24 53:7,8,14,15,18 54:10,20 55:3 57:3 58:4,10,12,13,14 58:19,19,20 59:13 60:5 sewers 14:19 shallow 43:1 share 59:19 sheet 3:6 64:5 65:13 sheets 64:6 short 21:11 shovelready 47:22 49:19,20,23 50:1 shovels 49:21 50:7,14 57:10 show 16:9 sic 15:4 18:24 32:15 48:9 side 43:4 45:9 58:4,5 58:10 sign 3:7 26:16,18 50:18 54:11 57:8 60:1 61:3 64:5 65:8 65:9,13,13 signature 7:21 14:6 64:24 65:7,22 signed 25:8,24,25 51:14 65:12,13 signing 3:23 64:7 simply 24:4 57:2,21 sincerely 65:17 single 13:17 site 9:24 10:23 11:1 14:16 15:4 18:19 18:20 22:8,14,21 22:22 34:4,23 39:1 45:19,24 46:13 54:15 sits 58:3 situation 13:7 30:9 42:12 44:5 45:15 six 6:6 sizable 42:2 size 12:13 35:3 slightly 18:21 smaller 46:3 solution 15:3 soon 49:21 61:7 sorry 5:1 19:5 22:3 </p>	<p> 23:17 32:17 44:2 48:21 49:2,6 sounds 47:25 south 1:16 2:4 4:12 58:4,9,10 65:2 southeast 56:6 65:14 southern 12:1 spanning 46:12 speak 4:20,21 40:1 speaks 28:19 39:22 specific 21:3 specifically 19:23 specifics 32:5 specified 27:1 square 13:25 14:17 14:18 15:13,24,25 18:8,19 19:1,10,11 32:14,16 46:3 48:8 54:4 60:14,15,16 standard 24:2 start 49:21 50:2,14 51:2,6,15 52:21 57:6 state 1:1 4:9 24:5 62:2 63:2,5,15 65:19 statement 22:5 31:2 station 8:20,21,24,24 9:4,10 10:7,12 12:6 12:25 13:11,16,20 14:15,20,21 15:7 16:7 17:6,17 18:16 18:20 19:2,6 21:19 21:23 22:2,19,25 23:3,6,8 26:21 27:13,14,18,25 28:6,25 29:2,4,12 30:4,7,22,22 31:5,7 34:3,6,9 35:15 37:3 39:10,23,24,24 40:3,6,10,23 41:9 41:19,24 42:4 43:6 43:19 44:11 46:10 47:2 48:8 49:3,7,9 50:11 51:23 52:16 52:20 53:2 54:14 54:22 56:10,21 57:20 58:1,22,22 58:23 59:1,2,5 stations 9:10 10:6 23:11,20 28:2,21 40:10 45:6 46:15 </p>
---	--	---	--	---

56:12 58:24,25 59:17 status 9:7 stenographic 62:8 stenographically 62:5 steps 56:18,19,20 57:21,24 stipulated 3:21 stop 58:7 street 2:4,9 12:22 33:5 36:15,17 55:24 58:4,5,8,10 streets 33:13 36:18 56:3 stuff 33:18 35:23 38:9 53:10 56:7 subject 24:5 64:21 submission 26:6 submit 9:17 21:8,18 22:5,8 30:8 38:22 40:20 50:12 56:16 56:24 submits 55:22 submitted 9:8 22:24 23:1 submitting 6:23 36:16 57:6 subsequent 17:14 38:19 substance 64:22 sufficient 41:25 suggested 12:18 16:7 42:20 suite 2:9 supposed 25:12 42:4 sure 4:22 18:5 19:7 20:10 36:3,24 47:25 55:12 61:3 surmise 25:18 sworn 4:4 63:8 system 8:25 10:11 12:17 13:19 28:20 29:10 30:16 40:2,9 43:7 53:8 54:6,6 58:12	taken 1:14 64:3 takes 10:10 49:19,22 talk 24:9 30:20 31:7 40:17 45:8 talked 24:16 59:21 talking 21:22 22:1 31:2 34:8,17 48:7,8 49:4,5 52:3 55:17 talks 23:22 30:12 32:7 39:9 tallahassee 2:5,10,14 4:14 19:13,22 tank 26:12 tap 58:11 tapped 55:19 tapping 56:3 telephone 2:8,13 tell 4:4 20:10,15 34:19 50:10 52:14 54:17 55:1 ten 54:23 55:2 term 49:25 terms 9:6 22:1,12 33:23 testified 4:5 18:11 32:1 38:15 49:15 60:1 testimony 3:2 22:21 26:17,17 thank 57:15 61:9 65:16 thanks 21:16 thats 6:11 13:12 14:24,25 16:11 17:11 19:24 20:8 20:14 21:11,22 22:1 25:10,16 27:11,12 28:10,18 32:9 34:25 36:9,17 37:8 38:3 40:14 42:23 44:17,20 45:20 50:21,21 53:11 55:11,13,17 55:18 56:5,14 57:13,14 60:22 theres 27:8,10 28:20 38:21 39:19 40:4 42:5 43:3 45:1,12 45:13 48:25 49:6,8 50:23 53:3 54:3,5,7 54:12,15,19 56:12 theyll 35:5	theyre 15:5 22:6,6,10 22:10 23:9 27:20 42:3 55:25 theyve 50:8 53:20 thing 48:25 52:2 things 23:23 29:17 36:4 think 12:11 18:22 19:25 26:16 29:18 32:1,13 37:9,18 38:15 39:11 42:3 45:1,4,16 46:5 49:15 50:20 51:5,8 51:17,17 52:5 53:24 57:11 60:22 thinking 5:20 third 8:19 30:11 three 6:3 24:17 30:12 46:7 time 1:15 9:5,10,13 10:4,18 20:8 30:5 30:20 41:16 42:7 47:3 64:7 65:7 title 5:13 6:1 today 8:17 19:24 48:2,3,11 total 6:5 town 10:21,25 19:24 20:15 trace 1:9 2:2 4:16 9:1 10:14 13:13 14:22 15:1,3 18:12,20 20:14 24:15 29:7 35:2 38:17 43:16 43:18,22 trade 5:24 36:22 traffic 33:14 58:7 training 6:7 transcribed 61:11 transcript 3:23 62:7 62:7 64:4 65:8,9,12 65:12 treating 5:9 treatment 10:10 26:12 27:1 40:7,11 45:12 trench 42:25 43:4 58:7,11 true 62:8 64:21 truth 4:4 try 4:20,22 20:11 51:12	trying 22:6 55:12 turn 10:16 38:21 turned 20:17 38:17 38:19 two 10:18,21,25 40:7 41:13,14,14 46:20 56:8 type 35:4 38:9 53:25 types 17:20 typically 7:2,4,24 22:4,4	<hr/> U <hr/> u 3:20 ultimate 53:13 ultimately 41:20 52:12 unavailable 54:7 undersigned 26:4 understand 20:11 21:11 29:21 35:20 understanding 25:6 25:13,13 30:3 47:14,24 uneconomical 55:1 unique 13:4,6 44:6 united 65:20 unities 6:1 units 10:1 22:7,7 46:3 universal 29:10 upgrading 47:7 use 22:18 23:8 28:5 45:21 57:25 usual 46:9 usually 41:1 46:19 utilities 5:22 36:8,9 56:6 utility 25:15 26:1 36:14 38:10	<hr/> W <hr/> waive 61:4 65:7,13 65:22 want 24:18,20 29:13 29:17 31:21 42:8,9 43:13,17 44:10 47:11 wanted 24:9 43:10 wasa 21:10,13,15,18 23:4,4 33:16 38:6 44:15 50:18 51:14 51:15 52:23 53:22 56:8 wasas 28:4 wasd 48:15,17 wasds 45:10 wasnt 34:18,25 waste 27:1 water 5:3,6,7,18,19 6:5,11,17 7:3,5 8:13 10:9 11:11 13:5,9 14:11 15:8 16:6 17:12 18:5 21:10 26:1 30:4 34:2 38:8,9,12,12 38:13 42:16,16 43:1 47:8 50:9 51:3 51:5,9 52:9,10,13 52:18 53:7 54:10 57:2 58:18 59:13 60:5 way 18:11,13,18 33:4 33:22 36:5,9 39:4 40:6 51:12 52:17 ways 40:7 wed 55:1 week 19:13 46:16 61:13 weigh 35:5 western 44:9 weve 4:19 24:16 55:24 whats 45:22,24 wholesale 5:8,9 willynilly 56:2 wish 65:13 witness 4:6 32:18 48:14 53:6 55:13 61:6,9 63:9 word 40:15 words 23:4 27:16 32:22 34:18 45:17
<hr/> T <hr/> t 3:9,20,20 64:1,1 table 43:1 take 5:8 35:20 48:5,7 49:16 50:16 65:6			<hr/> V <hr/> v 64:2 65:4 variance 28:8 various 5:24 verification 3:16 24:19 59:25 version 11:1 vice 37:20 view 45:10 46:1 54:19 vs 1:5		

work 20:24
works 33:12 36:7
 53:9 57:9 58:6
wouldnt 28:3 33:16
write 5:19,21 7:23
 8:3 25:12 54:21
 59:10,13 64:4
written 14:9 16:14
 17:9
wrote 21:24

X

x 3:1,9

Y

yeah 13:4 33:18 42:5
 44:3 49:2,20,20
 53:24
year 41:4,5 49:19,23
years 6:3,6 18:3 25:8
 46:7
youll 20:10 45:7
youre 15:23 20:20
 27:11 31:6 32:2
 36:21,22 37:1,23
 41:20 43:7 44:3
 48:21 53:6,22
youve 13:2 16:24
 46:6 50:6

Z

zoning 46:2

0

00 65:10,10
04 1:15

1

1 3:10 7:8,13 8:8,15
 9:25 10:23 29:14
10 1:15 61:15
100 22:7 41:6 59:7
10th 39:16
11 3:11,12,13
12 7:9 8:15 9:23
 28:22,24 29:14
 53:16 56:9
1218 65:14
123 2:4
12th 21:19 22:22
 39:21 46:23 48:19
 52:25

13th 53:16
14 3:14
141398bid 1:2
141399bid 1:3
141400bid 1:3
141425bid 1:4
141426bid 1:4
141427bid 1:5
141428bid 1:5
15 3:15
16 42:23
17 18:22,23
18 1:14 42:3 64:3
 65:1,6
18inch 60:20
18th 63:7
19 3:4
190 2:14

2

2 3:11 10:20 11:1,2,5
 26:24 32:14 35:16
 48:8 56:22 60:14
 60:15
20 63:16
200 22:7
2013 7:9 8:15 9:24
 10:14,20,25 11:18
 13:24 15:12 18:9
 21:20 22:22 28:23
 28:24 29:15 39:16
 39:21 48:20 52:25
 53:16 56:9
2014 1:14 19:14
 62:18 63:7,10 64:3
 65:1,6
2016 63:16
2018 39:16
20inch 12:11 43:8
21 1:15 10:20,25
 11:17 15:12 16:2,6
 61:15
21st 16:13,17 17:4
22 60:21
227 2:9
24 3:16
24hour 9:14
24th 63:10
25th 62:18
29th 19:13

3

3 3:12 11:2,6 28:7
30 57:12 65:10,12
31 3:17
31st 39:16
32301 2:5,10
32302 2:4,14
33146 4:12 65:3
33233 1:16
33316 65:15
34th 33:5 36:14
 55:23
3575 1:16 4:11 65:2
37 3:18
391 2:4
3rd 65:14

4

4 3:3,13 11:17,19,22
 28:14 62:8 64:3

5

5 3:14 13:24 14:1,25
 16:3 65:10
500 2:9
5252221 65:9
54 8:24 9:4,4 14:20
 16:7 18:20 28:25
 39:23 40:10 49:9
57 3:4

6

6 3:15 15:12,14,17
61 62:8
62 3:5
63 3:6
64 3:6
65 3:7

7

7 3:10,16 24:22,23,24
 59:25
700 32:14 35:16 48:8
 56:22 60:14,15
76 12:14

8

8 3:17 13:24 18:9
 31:23 60:13
80 10:1 46:3
8inch 14:19
8th 16:2 17:4,8

9

9 1:15 3:18 37:11,13
 65:10
954 65:9