

Robyn M. Severs, Esq.
Shareholder
Phone: (904) 423-5372 Fax: (904) 239-5938
rsevers@beckerlawyers.com



Becker & Poliakoff
100 Whetstone Place, Suite 302
St. Augustine, Florida 32086

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Via E-Mail: FEMA-R4-PA-Appeals@fema.dhs.gov

Federal Emergency Management Agency
Terry L. Quarles, CEM Director, Recovery Division
c/o Logan Rayburn, Appeals Coordinator
3003 Chamblee Tucker Road
Atlanta, GA 30341

Re: Response to Hammock Dunes Owners' Association, Inc.'s Pending First Appeal of Denial of Request for Public Assistance (FEMA-4337-DR-FL) - Request for Information

Dear Ms. Quarles,

The law firms of Becker & Poliakoff, P.A. and Clark Hill, PLC (Karen C. Bennett and Christopher B. Clare) represent Hammock Dunes Owners' Association, Inc. ("Applicant"), a FEMA-recognized private nonprofit ("PNP") organization as defined by the Stafford Act. I am also Applicant's Primary Contact/Authorized Agent for its Request for Public Assistance, and my direct office telephone line is 904-201-3681.

On May 21, 2018, FEMA requested that the Applicant provide (1) Federal law, regulation or policy which supports its assertion that the shoreline dune system owned and maintained by the Applicant constitutes an eligible critical or essential governmental-type service and (2) documentation demonstrating that the appealed facility provides a direct, governmental-type service, rather than an incidental benefit, to the general public. On June 13, 2018, FEMA granted a thirty (30) day extension to respond to the Request for Information permitting a response no later than July 20, 2018. On June 20, 2018, FEMA convened a facilitated discussion at Applicant's request.

The enclosed information is provided to augment the existing administrative record and to support the Applicant's claim that the engineered dune and berm system owned and maintained by Applicant performs essential flood control protection for Flagler County residents, utilities, and other structures, including those that are considered critical health and safety and emergency services. In addition, Applicant provides information to explain that Applicant's engineered flood control levee could itself be classified as a public utility in many parts of the

country. Finally, Applicant incorporates by reference the complete administrative record in the matter entitled, Hammock Dunes Owners' Association, Inc., Flagler County, Florida, Client/Matter: H23031/352615, Hurricane Matthew, PA-04-FL-4283-RPA-0210.¹

I. The Facility Provides Essential Health and Safety Services of a Governmental Nature.

A. The Facility is a Levee Designed for Flood Control.

Applicant's "shoreline dune system" is an engineered levee designed to provide flood control for the public (the "Flood Protection Facility" or "Facility"). FEMA's characterization of the Facility as recreational is simply wrong. FEMA has ignored evidence provided in Applicant's First Appeal Letter, explaining that Applicant's dune and berm flood control system is a levee, specifically engineered and built to perform permanent flood protection for Florida's citizens and natural resources, including major utility infrastructure that provide residents and non-residents with essential services such as potable water, wastewater treatment, stormwater management, and an emergency route on and off the barrier island.² The Facility provides flood control 100% of the time, and both public and private entities, homeowners, and FEMA itself rely on its continued integrity and ability to perform these essential services.

Evidence of the Facility's Flood Control is seen in a September 2014 U.S. Army Corps of Engineers ("Corps") report that assessed the feasibility of providing Federal Hurricane and Storm Damage Reduction measures to portions of the Flagler County shoreline.³ The Corps explained that the "four study reaches shown in Figure 1 encompass approximately 9.7 miles of coastline investigated in the Flagler County Feasibility Study. Other areas of the county did not have excessive erosion such that infrastructure was threatened, or potential benefits likely to outweigh the costs of implementing a solution." (Exhibit "B", Page ES-2.) More specifically, the Hammock (the location of the Facility) was not included in the study for the stated reasons. The study also noted that the structures are "buffered by a dune system that is wider than in other areas of Flagler County."

¹ FEMA's May 21, 2018 Request for Information referenced a first appeal decision denying a previous appeal on this facility under Hurricane Matthew on December 5, 2017. Since FEMA has referenced a previous denial on the same facility, Applicant requests the administrative record in that proceeding be incorporated by here.

² See the enclosed pictures depicting the back side of the dune/levee (Exhibit "A"). The Association maintains the dunes in a heavily vegetated manner for root stabilization and no construction is allowed to encroach on the full width of the dune. The uniform height and width and heavy vegetation demonstrate the inland construction and widening of the dune and that the levee is manmade, not used for recreation, and not a natural shoreline dune system. The levee was engineered and built as part of the DRI.

³ Hurricane and Storm Damage Reduction Project Final Integrated Feasibility Study and Environmental Assessment, Flagler County, September 2014 by the US Army Corps of Engineers, Jacksonville District (Exhibit "B"). Due to the voluminous size of the report, only relevant pages were included. However, the full report can be viewed at http://www.flaglercounty.org/document_center/BOCC%20administration/FlaglerCoSPP_FinalMainSep2014.pdf.

Thus, before Hurricanes Matthew and Irma hit Flagler County, the Corps had recognized the strength and importance of the Applicant's engineered levee system and that the Facility had been constructed to provide a flood control barrier from storm damage.

The significance of the flood control provided by Applicant's Facility is also supported by the fact that Flagler County is still under a local State of Emergency. On January 8, 2018, Flagler County identified the damaged dune system of the entire coastline of the County, including Plaintiff's Facility, as the primary reason the County continues to declare a State of Local Emergency to this date. See Emergency Berm (Dune) and Partial Engineered Dune Restoration Agreement, pg. 1. (Exhibit "H"). The damaged dune system and severe erosion of the beach makes the public infrastructure and neighborhoods on the barrier island, where the Facility is located, vulnerable to storm and tidal events. If the Facility did not provide a direct governmental type service, or a critical service to the general public, then the County would not continue to be under a local state of emergency. However, due to the damaged Facility, the County will not even consider lifting the state of emergency until the Dunes Restoration Project is completed.

B. The Facility is Part of a Private-Public Utility System.

The Facility was developed in partnership with local government pursuant to Flagler County Resolution 84-7 dated March 30, 1984, and the Hammock Dunes Development of Regional Impact ("DRI").⁴ Under the DRI, acting as an instrument of local government, the developer undertook the cost of providing essential infrastructure and flood protection that the County was unable to provide. Among other things, the DRI required Hammock Dunes' development company to provide: surface water management system; internal potable water distribution and fire hydrant system; wastewater collection; treatment and disposal systems; major north/south arterial roads (main road network); Intracoastal Waterway Bridge; and repair/improve the dune system in order to protect the utilities from ocean flooding through the dune. Responsibility for this infrastructure was intended to be later transferred to an independent "unit of special purpose local government."

In 1985, the developer, with help and approval of the County and State of Florida, established the Dunes Community Development District ("DCDD") for this purpose. The developer and DCDD worked in unison to engineer the surface water retention system and the potable water/irrigation water/and wastewater treatment systems, as an integrated (Applicant & DCDD) utility system with the assured assumption that the Applicant's flood control dune/levee would be built and maintained. Applicant's role in DCDD's ability to provide essential utility services is more than significant.

⁴ The 1974 Flagler County Property Appraiser's Aerial Map depicts pre-DRI conditions and the Google Earth Photo, 2/16/2016, pre-Matthew depicts ocean-front flood control berm system and development it protects from 100-year storm events. The residential community could not have been developed in the flood plain without Applicant's engineered flood protection dune system. See also 1980 U.S. Department of Agriculture Aerial Photo depicting dune breaches and flooding prior to DRI in 1983. (See Maps in Composite Exhibit "C").

Additionally, over the past decade, Applicant has spent hundreds of thousands of dollars maintaining the banks of the inland lake system to control water flow into the lakes, and to maintain the lake run-off capacities for rain water. Without coordinated land management/maintenance by the Applicant, the lake systems cannot be successfully managed by DCDD. However, the capacity of the inland lakes are designed only for several feet of rainfall over a few days of a large storm, not to contain any water from an ocean breach through the dune. Should the inland lake system flood with ocean water, emergency route A1A would be blocked and hundreds if not thousands of residences would be damaged or destroyed. Salt water infiltration and flooding would destroy the ability to use water from the inland lake system for irrigation. Salt water infiltration would destroy the wastewater return flows and cause the utility to undertake costly remediation of its water source. Moreover, through an exclusive perpetual easement with Applicant, the DCDD is using Applicant's property for water wells necessary to provide a reliable potable water source.⁵ These essential services can only be provided through the closely integrated (direct, shared, and essential) government-type relationship between Applicant and the DCDD.

Flagler County has continued this private-public utility system by proceeding to perform the necessary reparations now on its dunes as well as on the Applicant's Facility, under the same Florida Department of Environmental Protection Permit⁶ with partial payment already made and with the expectation that it will be further reimbursed by the Applicant at a later date. Evidence of Flagler County's position is further supported by the enclosed Resolution Creating the Dunes Restoration Project Special Assessment District to Install an Emergency Protective Berm as well as in the Emergency Berm (Dune) and Partial Engineered Dune Restoration Agreement. (Exhibit "I"). In the Resolution and the Agreement, the County recognizes the "paramount public purpose" and the essential governmental health and safety services provided by the Facility to prevent loss of property, to prevent contamination, and to prevent hazardous structures. As in *Hancock* (explained below), the Applicant serves a prominent role in providing essential governmental services and this Agreement evidences the Applicant's unique relationship with the County, strongly supporting the granting of its eligibility request.

C. Applicant is Legally Required to Provide Health and Safety Services.

The Stafford Act, 42 U.S.C. 5122(8)(A), defines local government to include an agency or instrumentality of a local government. The DRI established that the Applicant operates as an instrumentality on behalf of the local government (Flagler County) and the DCDD. Letters from Flagler County and the DCDD verify the private-public partnership between these governmental entities and the Applicant, and the critical role the Applicant's dune system plays in protecting

⁵ See, Grant of Exclusive Perpetual Easement (Raw Water Wells and Facilities) between HDOA and Flagler County, Final Easement Agreement, May 15, 2006. (Exhibit "D").

⁶ Permit Number: FL-384 E issued by the State of Florida, Department of Environmental Protection, Dec. 12, 2017 (Exhibit "E"), which followed the Applicant's permit FL-381E for the repair of the dunes after Hurricane Matthew.

the public and its essential utility and emergency assets, on behalf of the local government. (Exhibits “J”).

Applicant also provided evidence establishing that it is legally required to provide essential health and safety services to the public by ensuring that the Facility is maintained and protects the public from flooding. Section 380.06, Florida Statutes, defines a DRI as a development that has “*a substantial effect upon the health, safety or welfare of citizens of more than one county.*” (Emphasis added.) Hammock Dunes is a DRI, and thus, by its very nature, Hammock Dunes has a substantial effect on the health and safety of the public. *See also* pg. 3 of the Applicant’s Jan. 31, 2018, First Appeal Letter for more information as to the specific services provided by the Facility.

D. Applicant’s Facility Operates Part and Parcel with Local Government to Provide Services Considered to be of a Governmental Nature under the Stafford Act.

Under 44 C.F.R. § 206.221(e)(7), eligible private non-profit (“PNP”) facilities include those that “provide health and safety services of a governmental nature.” What constitutes a “health and safety service of a governmental nature” is not further defined; however, Section 102 of the Stafford Act defines eligible “public facilities” as including “[a]ny flood control, navigation, irrigation, reclamation, public power, sewage treatment and collection, water supply and distribution, watershed development, or airport facility.”

The explicit inclusion of “flood control” as an example of an eligible public facility makes it abundantly clear that flood control facilities are “of a governmental nature.” Furthermore, the County has already applied and received approval for funding to restore an immediately adjacent berm system that provides the same health and safety services. The Applicant’s Facility is directly adjacent to the County’s berm facility, and these facilities indeed “tie into” one another to provide a unified and effective flood control system for the area. As further evidence of the importance of Applicant’s dune system to the County’s overall flood control system, Applicant provides a copy of a joint agreement between the County and Applicant to jointly repair the damaged dune system, as well as an “Emergency Permit and Notice to Proceed for Construction” issued by the State of Florida, Department of Environmental Protection, which covers the rest of the County’s system and Applicant’s 2.34 miles of dune under one permit. (Exhibit “E”). This evidence establishes that Applicant’s Facility operates, part and parcel, with the County’s flood protection system.

In *Hancock County Amateur Radio Association*, FEMA 4081-DR-MS (June 3, 2014), which involved a privately-owned radio broadcast service, FEMA explained:

Under the facts of this case, however, FEMA recognizes the Applicant’s radio station as an “essential governmental service facility” because it provides “health and safety services of a governmental nature.” In reaching this conclusion, FEMA has taken into consideration a variety of factors, including the Applicant’s

unique relationship with the Hancock County government and the prominent role it has played in providing information to community residents during past disasters and emergencies. According to documentation provided by the Applicant, the Applicant's radio station serves as the lead broadcast station for the county for issuing warnings and notifications to the public during hurricanes and tropical storms and other catastrophic events. ... In light of the role the Applicant's radio station plays during community disasters and emergencies, FEMA finds that the Applicant operates an "essential governmental service facility" that provides health and safety services. As such the Applicant is eligible as a PNP to apply for assistance.

Like the radio services at issue in *Hancock County Amateur Radio Association*, the facts here, including the Applicant's unique relationship with the County and the prominent role the Facility has played in flood protection during past disasters and emergencies, support a finding that the Applicant's Facility provides health and safety services of a governmental nature.

Accordingly, the evidence unequivocally establishes that the Applicant is acting as an instrumentality of local government by stepping into the shoes of the County to provide essential health and safety services, and critical flood control for the area protected by its Facility, including utilities that provide essential health and safety services without which homeowners would be displaced by flooding and lack of potable water and sewer services.

E. FEMA Also Relies on Applicant's Facility to Provide Flood Protection

Furthermore, FEMA itself relies on the flood protection provided by Applicant's Facility for purposes of depicting risk on flood maps that make it possible for homes to be built in the 100-year floodplain.⁷ As indicated on the aerial photos included as Exhibit "C", the Facility was engineered pursuant to the terms of the DRI to create a direct barrier for flooding. Before the establishment of the DRI, only natural dunes existed along the beach, which dunes contained approximately twenty (20) breaches and were not designed or engineered to provide any flood protection. With the establishment of the DRI, the Facility was designed and constructed as a flood protection barrier or berm. FEMA's March 2016 Flood Maps illustrate that the Facility would prevent any flooding, in a 100 year rated storm event. However, as Hurricanes Matthew and Irma exceeded a 100 year rated storm event, the Facility was breached in various places. FEMA's Flood Map dated, June 2018, nonetheless still illustrates that FEMA expects the Facility to prevent any flooding past the Facility. As the Facility was severely compromised by Hurricanes Matthew and Irma and contained breaches, the only way FEMA could conclude that flooding would not penetrate past the Facility, is if it expected the Facility to be reconstructed. Accordingly, FEMA's own flood map department is relying on the direct, essential flood protection that is provided by the Facility.

⁷ FEMA Flood Maps 2016-2018 predicting flood risk assume Applicant's berm system would effectively protect against hurricane storm surges. (Exhibit "F").

II. There is No Requirement that Homeowners Associations Own Utility or Emergency Facilities, but Flood Control Levees Could be Classified as Levee Districts, which are Utilities, Expressly Eligible for FEMA Funding.

FEMA's denial of Applicant's funding request asserted that if owned by a property or homeowners association, only those facilities used to provide utility and emergency services are considered to be eligible facilities. This position is not supported by the Stafford Act, the regulations, or even the policy document (the Public Assistance Program and Policy Guide ("PAPPG")) cited by FEMA to support its denial. The PAPPG page cited by FEMA does not state that all facilities owned by homeowners association are ineligible unless they are utilities or emergency facilities; it simply indicates that "facilities such as roads and recreational facilities" are ineligible unless they "could be classified as utilities or emergency facilities," PAPPG, pg. 15. Furthermore, the PAPPG explicitly includes an example of an eligible facility owned by a homeowners association that is *not* a utility or emergency facility (*i.e.*, a community open to the public and used for social, educational, enrichment, and community service activities). See PAPPG, pg. 171.

Even assuming, however, that such a requirement did exist, Applicant's Facility could be classified as a levee district, which is a utility and, thus, it is eligible to apply for public assistance. As set forth above, Applicant's Facility forms an integral part of the special utility district directed by the DRI for purposes of flood control and which is considered a utility in other parts of the country. Accordingly, even if FEMA could appropriately limit eligible facilities to utilities or emergency facilities, Applicant's Facility could be properly classified as a utility, and would nonetheless remain eligible for PA funding.

III. There is no "Direct" Requirement in Law or Policy, but the Facility Nonetheless Provides a Direct, Governmental-Type Service.

A. There is no "Direct" Requirement.

Initially, it is worth emphasizing that there is no legal basis in statute or regulation to support the notion that Applicant's Facility must provide a "direct service" to the general public to be eligible for Public Assistance ("PA") funding. Indeed, the direct service criteria requirement suggested in FEMA's RFI letter does not even exist in any formal FEMA policy.

The Stafford Act does not confer FEMA with authority to rely on unwritten rules that arbitrarily discriminate against PNP applicants based on vague standards with no legal basis. Instead, it requires that FEMA must distribute its funds "in an equitable and impartial manner." 42 U.S.C. § 5151(a).⁸ Additionally, it provides that FEMA must "provide notice and opportunity

⁸ The United States Constitution's Due Process Clause provides similar protections against such discriminatory conduct.

for comment before adopting any new or modified policy that (A) governs implementation of the [PA Program]; and (B) could result in a significant reduction of assistance under the [PA Program].” 42 U.S.C. § 5165c(a)(1). And that “[a]ny policy adopted under paragraph (1) shall apply only to a major disaster or emergency declared on or after the date on which the policy is adopted.” 42 U.S.C. § 5165c(a)(2). Therefore, under 42 U.S.C. § 5165c, with respect to applicants seeking relief based on a particular major disaster or emergency, FEMA cannot rely on a policy that was not published for public notice and comment before the declaration of the major disaster or emergency in question.

FEMA’s own publications recognize the federal government’s commitment to “protecting people and property” from flooding; that flood control is “a national priority”; and that flood protection is a “vital benefit.”⁹ It is indefensible for FEMA to describe flood control as a “vital benefit” that is eligible for recovery in the case of governmental entities, and then, in another instance, conclude that these same activities are a mere incidental benefit where performed by a nongovernmental Applicant.¹⁰ FEMA’s suggestion that Applicant’s engineered flood control facility is an unimportant part of Flagler County’s emergency flood control system finds no support in reality, law or FEMA policy, and makes no sense.

Any final FEMA determination denying Applicant’s eligibility to apply for PA funding that relies on unwritten requirements of “directness” (or an unwritten requirement that homeowners’ association facilities are ineligible unless they are utilities or emergency facilities) would violate the Stafford Act. Such a decision would also have the negative impact of discouraging other PNPs from providing these essential health and safety services.

B. The Facility Provides a Direct Benefit.

Although there is no “direct” benefit requirement, the Flood Protection Facility nonetheless provides a direct benefit. The Flood Protection Facility was specifically designed to perform permanent flood protection for Florida’s citizens and important natural resources. As detailed in the First Appeal Letter, the Facility provides a direct service to the public in the following manner:

- Protects a power grid that serves the entire island;
- Protects a water system that serves a major portion of the entire island;

⁹ *History of Levees*, Federal Emergency Management Agency, available at https://www.fema.gov/media-librarydata/1463585486484-d22943de4883b61a6ede15aa57a78a7f/History_of_Levees_0512_508.pdf; *Living with Dams*, Federal Emergency Management Agency, at *1, available at https://www.fema.gov/media-library-data/20130726-1845-25045-7939/fema_p_956_living_with_dams.pdf. U.S. Army Corps of Engineers publications also recognize that “[t]he proper operation and maintenance of a flood control system is . . . vital.” *Levee Owner’s Manual for Non-Federal Flood Control Works*, U.S. Army Corps of Engineers, available at [http://www.nws.usace.army.mil/Portals/27/docs/emergency/LeveeOwnersManual\(final\).pdf](http://www.nws.usace.army.mil/Portals/27/docs/emergency/LeveeOwnersManual(final).pdf).

¹⁰ See also Webster’s Thesaurus, available at <https://www.merriam-webster.com/thesaurus/essential> (stating that “vital” is a synonym of “essential”).

- Protects a sewer system and waste water treatment facility that serves a major portion of the entire island from flooding and salt;
- Protects communications systems that serve the entire island;
- Protects the only evacuation route that serves the entire island; and
- Protects the natural resources, animals and plant life in the Facility.

If the Facility is breached, every one of these critical and essential governmental services would fail and the residents on the island would be without each and every one.¹¹ Suggesting that flood protection is not a “direct” service to the public simply ignores reality. Like the radio broadcast service at issue in *Hancock County Amateur Radio Association*, the Flood Protection Facility provides direct health and safety support to the public in times of emergencies. It is hard to imagine a more “direct” service to the public during such times.

As in *Ocean Grove Camp Meeting Association*, FEMA-4086-DR-NJ (Dec. 9, 2013), a unique relationship exists between the County and the Applicant pursuant to the DRI.¹² Indeed, the Applicant’s Facility is part and parcel to Flagler County’s flood control system (which has already been approved for PA funding). There is no reason to treat Applicant’s Facility any differently than one owned and maintained by a governmental entity, particularly where the Applicant acts as an agent or instrumentality of local government. Instead, as in *Ocean Grove*, the Applicant’s Request should be approved.

Additional support that demonstrates that the Facility provides a direct essential governmental-type service to the general public is found in the following enclosed documents, as further explained above:

1. Hurricane and Storm Damage Reduction Project Final Integrated Feasibility Study and Environmental Assessment, Flagler County, September 2014 by the U.S. Army Corps of Engineers, Jacksonville District (Exhibit “B”);
2. FEMA’s Flood Maps (Exhibit “F”);
3. Flagler County Proclamation Extending State of Local Emergency (Exhibit “K”).
4. Flagler County Resolution Creating Dunes Restoration Project Special Assessment District to Install an Emergency Protective Berm and Emergency Berm Restoration Agreement (Exhibit “I”);

¹¹ See Exhibit “G” for photos illustrating flooding potential.

¹² Pursuant to Section 380.03 and 380.06, Florida Statutes, the Board of County Commissioners of Flagler County, is authorized and required by law to consider the Hammock Dunes application for development approval for a DRI known as Hammock Dunes.

5. Letter from Craig M. Coffey, Administrator, Flagler County to Terry L. Quarles, CEM Director, Recovery Division, FEMA, July 13, 2018 (Exhibit “J”); and
6. Letter from Gregory L. Peugh, PE, District Manager, DCDD to Terry L. Quarles, CEM Director, Recovery Division, FEMA, July 13, 2018 (Exhibit “J”).

IV. Whether the Facility is “Critical” is Irrelevant, but the Facility is Nonetheless Critical.

The RFI asks for support of the position that the Facility provides an eligible “critical or essential governmental-type service.” As outlined above and in the First Appeal Letter, it is clear that the Facility provides “critical” services by any reasonable definition of that word, but the Applicant believes it is worth explaining that whether the facility provides “critical” services should not be at issue here. 44 C.F.R. § 206.221(e) provides the definition for “private nonprofit facility.” Notably, this definition includes a “facility providing essential governmental type services to the general public.” 44 C.F.R. § 206.221(e)(7) then defines “other essential government services facility” to include, among others, “facilities which provide health and safety services of a governmental nature.” The phrase “critical services” does not, however, appear anywhere in this definition.

In reality, the word “critical” appears only one time in the entire section of the regulations on PA funding, in 44 C.F.R. § 206.226, which concerns the permanent restoration of damaged facilities. 44 C.F.R. § 206.226(c) provides that a PNP facility is eligible under the PA program if it: (1) “provides critical services, which include power, water (including water provided by an irrigation organization or facility in accordance with § 206.221(e)(3)), sewer services, wastewater treatment, communications, emergency medical care, fire department services, emergency rescue, and nursing homes;” **or** (2) the relevant private nonprofit organization has applied for an Small Business Administration (“SBA”) disaster loan. (Emphasis added.)

Therefore, whether a PNP facility provides “critical services” is a separate inquiry from whether it provides “health and safety services of a governmental nature,” and should only be considered with respect to whether a PNP is required to apply for an SBA loan when seeking PA funding for permanent work. While the materials submitted in the record thus far provide more than an adequate demonstration that the Flood Protection Facility provides critical services, the Applicant has nonetheless also applied for an SBA loan. Therefore, the analysis as to whether the Facility provides “critical” services is not relevant to determine eligibility.

V. Conclusion.

In conclusion, the Applicant's Flood Protection Facility unquestionably provides essential health and safety services of a governmental nature, and is eligible to apply for PA funding. There are no legal requirements that limit eligible homeowners' association facilities to utilities or emergency facilities or that an eligible PNP facility provide "direct" essential government-type services. However, even if such requirements did exist, the Facility's engineered dune and beach system provides a direct essential governmental service to the public and could be classified as a utility, or as an agent of the local government. Applicant respectfully requests that the denial of its Request be overturned.

I look forward to hearing from you soon.

Very truly yours,



Robyn M. Severs

Karen C. Bennett
Christopher B. Clare
CLARK HILL PLC
1001 Pennsylvania Avenue NW, Suite 1300 South | Washington, DC 20004
202.572.8676 (Direct) | 202.255.0291 (Cell) | 202.552.2369 (Fax)
KBennett@ClarkHill.com | www.clarkhill.com

cc: Hammock Dunes Owners' Association, Inc.
Amanda Campen, FDEM Appeals Officer (Amanda.Campen@em.myflorida.com)
Ashley Cook, North Florida Regional Director, Office of Senator Marco Rubio
(Ashley_Cook@rubio.senate.gov)
Josiah Manzo, Director of Constituent Services (Josiah_Manzo@billnelson.senate.gov)
Dustin Carmack, Chief of Staff, Office of Congressman De Santis
(Dustin.Carmack@mail.house.gov)

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