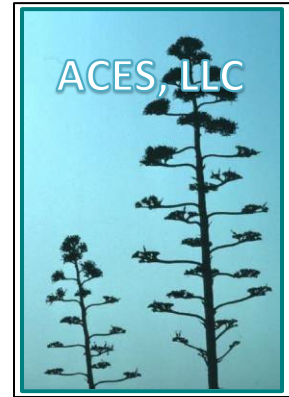


Andrew Conklin Environmental Services, LLC

Integrating Successful Development and Environmental Integrity

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January 16, 2022

Mr. Brian Herbert
424 NE 2nd Street
Boca Raton, Florida 33432

Re: 502, 514, & 526 Martin Road, Palm Bay
ACES File No. 2213

Dear Mr. Herbert,

Andrew Conklin Environmental Services, LLC (ACES) has completed a review of environmental issues associated with the above-referenced properties, consisting of Parcels 23, 24, and 25, a total of +/-2.03 acres, located in Section 3, Township 29 South, Range 37 East, Brevard County, Florida. Figure 1 depicts the location of the subject parcel and Figure 2 is a recent aerial photograph of the property depicting current conditions thereon. On January 5, 2022, ACES inspected the site for the presence of wetlands, protected species, and indications of protected species habitat. To assess the presence and extent of wetlands, we implemented the jurisdictional wetland identification methodologies of the St. Johns River Water Management District (SJRWMD) and the U.S. Army Corps of Engineers (ACOE), which incorporate an analysis of on-site vegetation, soils, and hydrology to determine the presence or absence of jurisdictional wetlands. The likelihood of protected species habitation was determined by identifying the various vegetative communities and habitat types currently present on the site and referencing these against standards and indicators used by the Florida Fish and Wildlife Conservation Commission (FWC) and the U.S. Fish and Wildlife Service (USFWS). Following is a presentation of our findings.

Soil Types

The USDA Natural Resource Conservation Service (NRCS) maps the site as being underlain by two soil types (see Figure 3). Soil maps are used by the environmental regulatory agencies as a general guideline to determine the likelihood of wetland and upland conditions on reviewed properties; soils more commonly associated with wetland conditions potentially indicate areas of lower elevation and greater surface hydrology, whereas soil types that are more commonly associated with uplands are expected to exhibit fewer or no wetland characteristics. Potentially hydric (i.e., wetland) soil types are listed in the *Hydric Soils of Florida Handbook* (Victor W. Carlisle, et al., 2007).

It should be noted that the original USDA soil survey of Brevard County was completed in 1974, and still remains the basis of the existing NRCS soils data; no new comprehensive field data has been generated for Brevard County since 1974. Due to this data gap, it is not uncommon for historical land uses, adjacent development, and drainage alterations to affect surface soils to the point where they might no longer reflect the conditions that existed in 1974.

ACES sampled soil types throughout the subject property by excavating cylindrical soil plugs from the surface, and assessing the soil profiles and characteristics of each plug. Following are brief descriptions of the soil types that are mapped on the subject site, compared to our observations of current soil conditions.

Basinger Fine Sand, 0 to 2 Percent Slopes – NRCS Code No. 7: This is listed as a nearly level, poorly drained sandy soil in sloughs of poorly defined drainageways and depressions in the flatwoods. It is occasionally flooded for two to seven days following heavy rains. In most years the water table is within a depth of ten inches for two to six months of the year, and between 10 and 40 inches for six months or more. In the dry seasons it is below a depth of 40 inches for short periods. The *Hydric Soils of Florida Handbook* identifies this as a hydric soil in 95 percent of the areas in which it is mapped.

This typically-hydric soil type is mapped over all but the southeast corner of the site. No hydric soils were found on the property. Rather, soils were found to consist of non-hydric sand.

Eau Gallie Sand, 0 to 2 Percent Slopes – NRCS Code No. 17: Eau Gallie Sand is a nearly level, poorly drained sandy soil in broad, low ridges in the flatwoods. In most years the water table is within a depth of 10 inches for one to four months and between 10 and 40 inches for more than six months. In dry seasons it is below a depth of 40 inches. This soil type is typically associated with uplands, but can also qualify as hydric when it contains significant components of Malabar Sand or Pineda Sand. The *Hydric Soils of Florida Handbook* list this soil type as a hydric soil in only about seven percent of the areas in which it is mapped.

This typically non-hydric soil type is mapped within the southeast site corner. Soils in this area are similar to those examined elsewhere on the property, being composed of non-hydric sand.

Community Types

Using the Florida Land Use, Cover and Forms Classification System (FLUCFCS) as a guideline, ACES categorized the site for the presence of distinct natural communities and land uses according to FLUCFCS designations and code numbers. Figure 4 depicts the FLUCFCS code designations on the property. These are:

Shrub and Brushland – FLUCFCS Code No. 320: This shrubby upland community occupies most of the two southern lots, covering a total of about 1.06 acres. It contains a mixture of saltbush, Brazilian pepper, American beauty berry, cogon grass, ragweed, and scattered cajeput. Underlying soils are composed of non-hydric sand. No wetland hydrologic indicators were found.

Pine Flatwoods – FLUCFCS Code No. 411: This forested upland community occupies most of the northern lot and extends along the west and southern property boundaries, covering a total of about 0.97 acres. It contains a canopy of slash pine with components of Darlington's oak and Brazilian pepper over a midstory of scattered saw palmetto and saltbush, and a ground cover of cogon grass and American beauty berry. Soils are composed of non-hydric sand, with no indication of wetland hydrology.

Wetland Considerations

No wetlands are present on the property. As such, no permits or mitigation for wetland impacts are

applicable for this site.

Protected Species

On the date of our site assessment, ACES assessed the property for any indications of habitation by protected wildlife species. This included examining the property for direct visual and auditory evidence of protected species themselves, as well as assessing the site for the presence of secondary indicators, such as burrows, nests, nesting cavities, scat, tracks, trails, rookeries, etc. No evidence was found of any protected species or protected species habitat on the site. We therefore expect that the property can be developed without the need for permitting or mitigation for potential impacts to protected species.

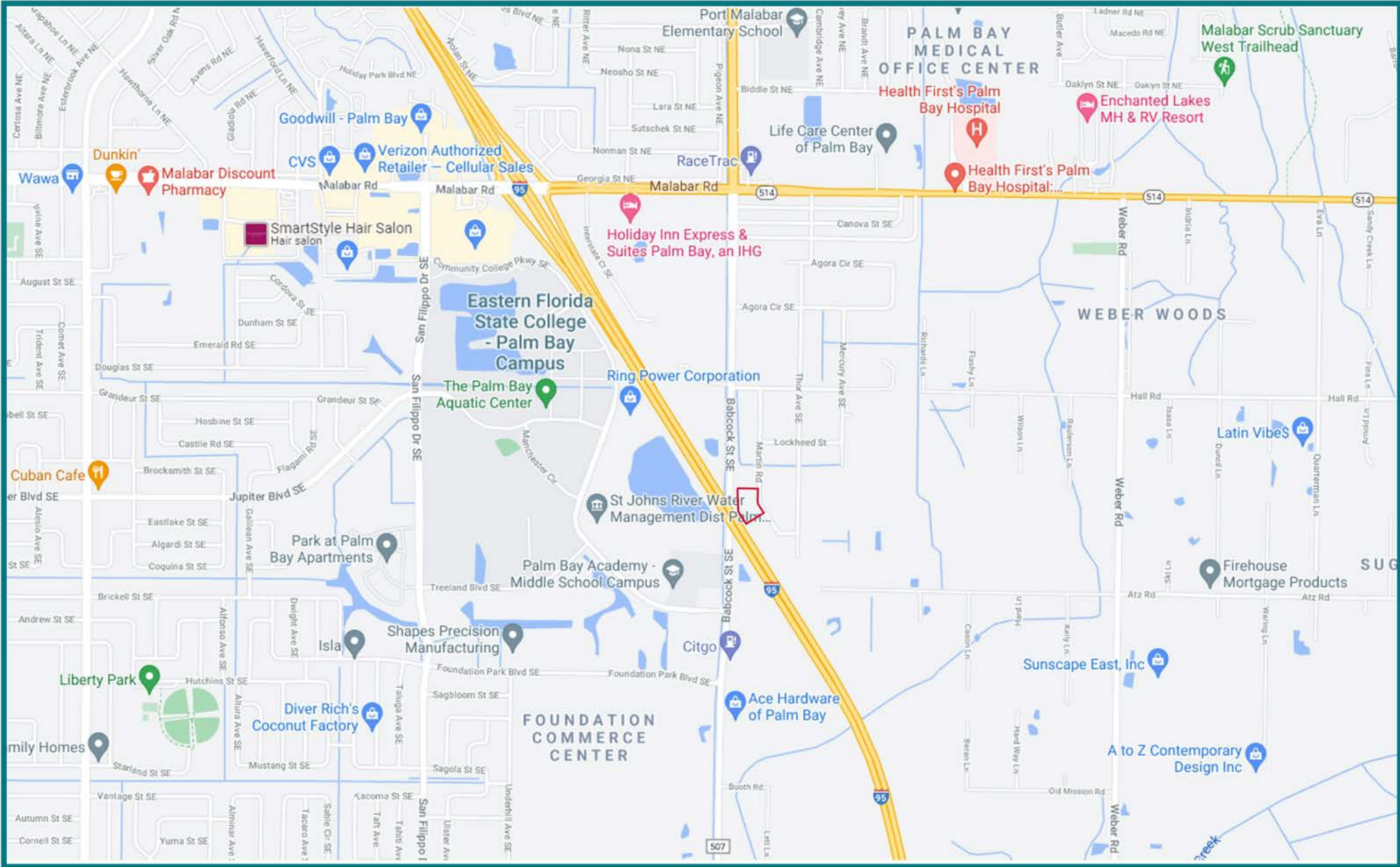
Summary and Conclusion

ACES has completed an environmental assessment of 502, 514, and 526 Martin Road in Palm Bay, Florida. It is our determination that the site consists entirely of uplands. No permits or mitigation for impacts to wetlands or surface waters are expected to be required in association with the development of this property. Furthermore, no evidence of protected species was found on the site; as such, it is our professional opinion that site development will not adversely affect any listed species of wildlife. If you have any questions or are in need of any further information, please do not hesitate to contact our office.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Conklin". The signature is fluid and cursive, with a large initial "A" and a distinct "C" for "Conklin".

Andrew Conklin – President, ACES, LLC

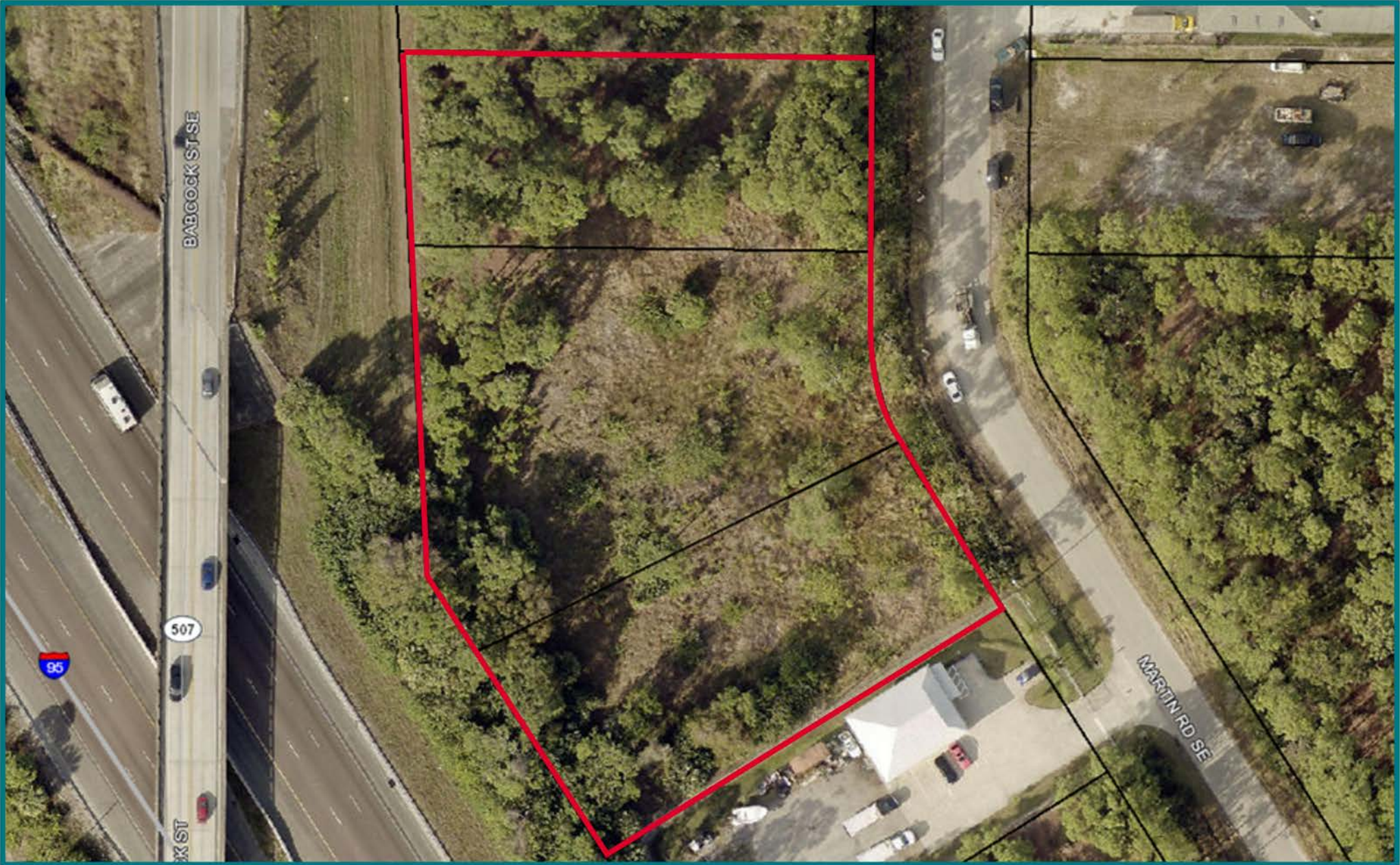


Source: Google Maps



Fig. 1 - Location Map
ACES File No. 2213 - 502, 514, & 526, Martin Rd.

 - Subject Site

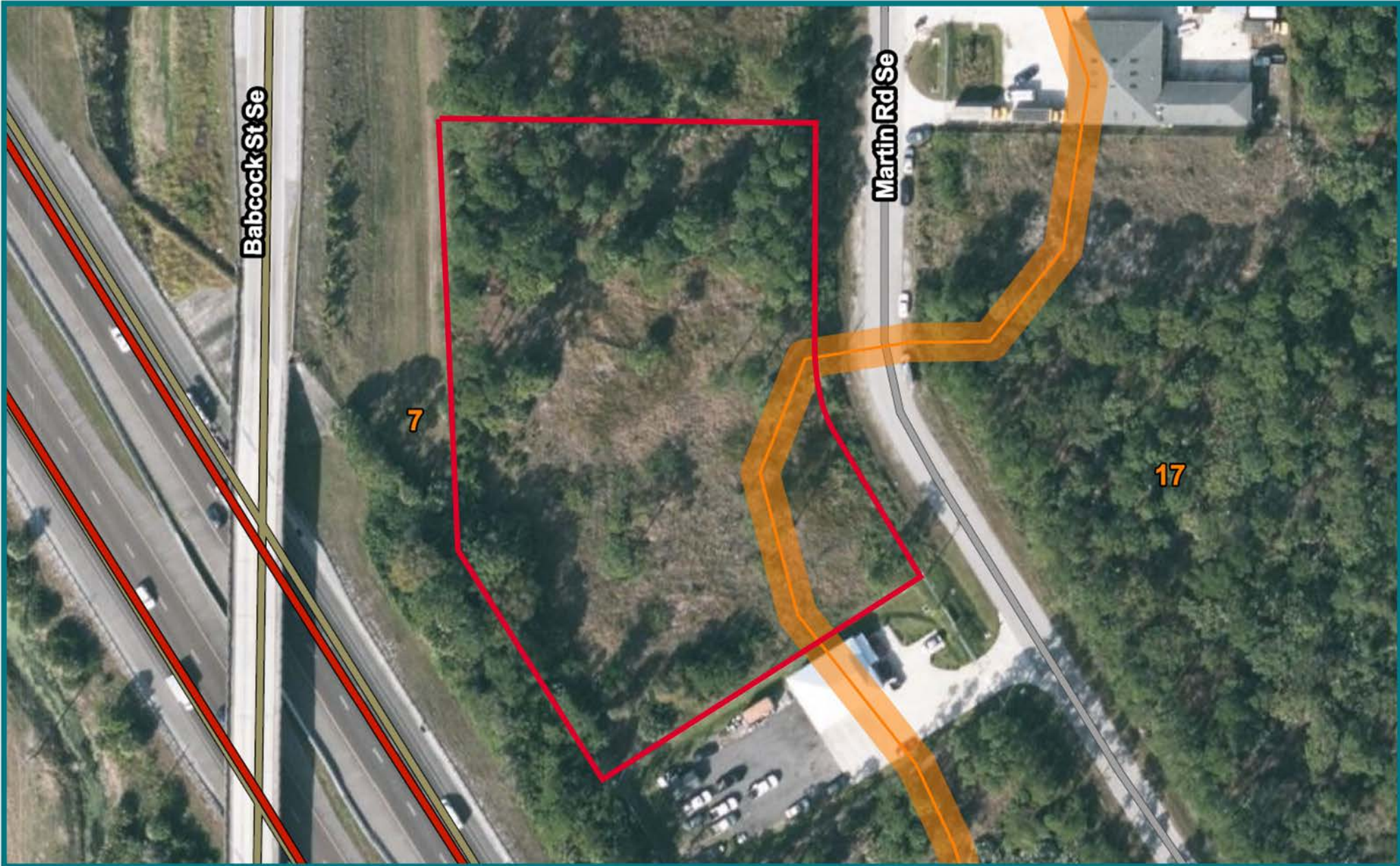


Source: Brevard County Property Appraiser



Fig. 2 - Aerial Site Photograph
ACES File No. 2213 - 502, 514, & 526, Martin Rd.

 - Subject Site



Source: USDA Natural Resources Conservation Service (NRCS)



Fig. 3 - NRCS Soils Map

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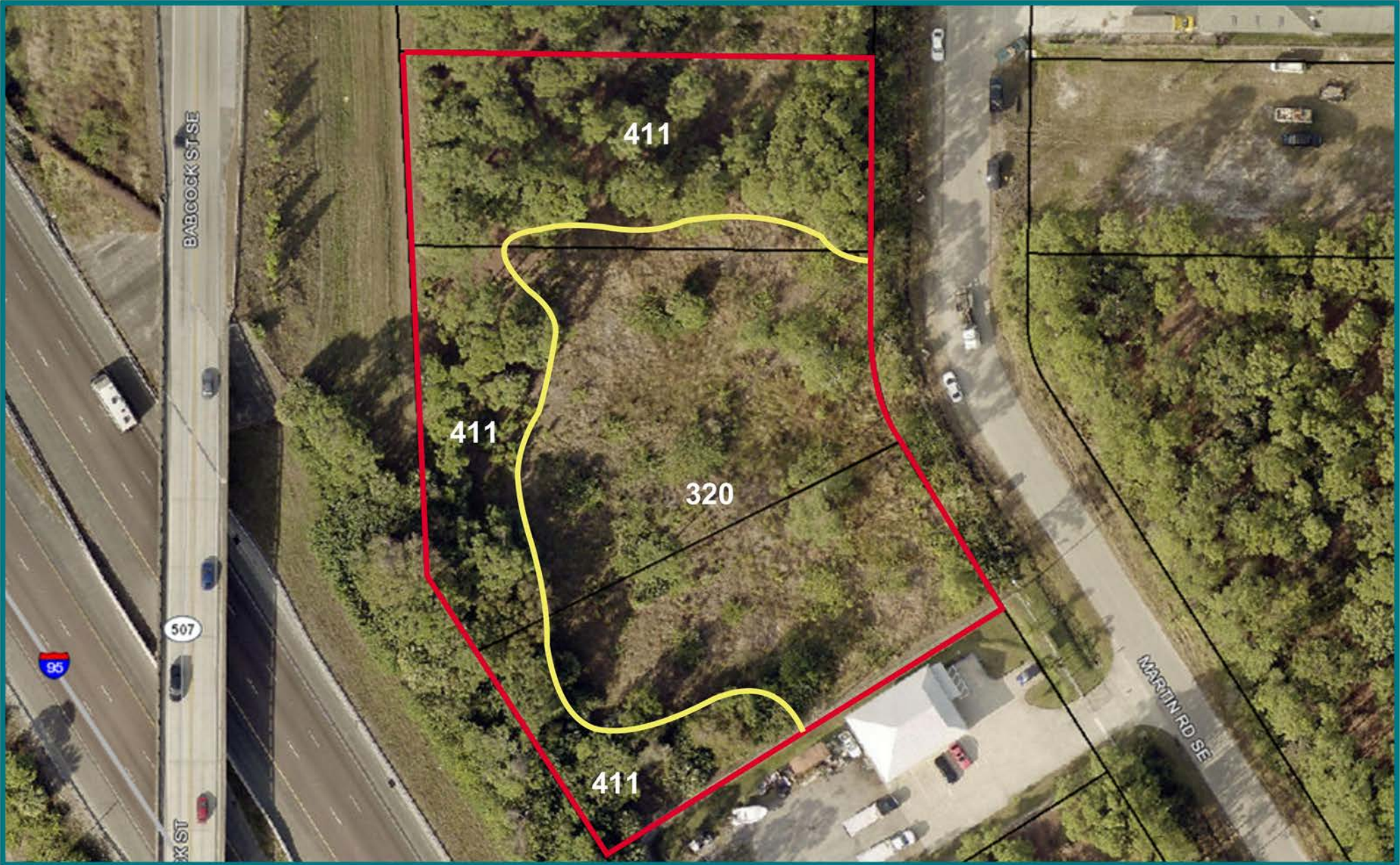
- Subject Site



- NRCS Soil Type Boundaries

7 - Basinger Sand, 0 to 2 Percent Slopes

17 - Eau Gallie Sand, 0 to 2 Percent Slopes



Source: Brevard County Property Appraiser
 Codes referenced to the Florida Land Use Cover and Forms Classification System (FLUCFCS)



Fig. 4 - Environmental Survey Map
 ACES File No. 2213 - 502, 514, & 526, Martin Rd.



- Subject Site



- FLUCFCS Community Boundaries

320 - Shrub and Brushland
 411 - Pine Flatwoods