

September 28, 2015
ECT No. 150630-0300

Stephen Hofstetter
Alachua County Environmental Protection Department
408 West University Avenue, Suite 106
Gainesville, Florida 32601

Re: Field Verification of Wetland Delineation lines for the Plum Creek Envision Alachua Project

Dear Mr. Hofstetter:

Two Environmental Consulting & Technology, Inc. (ECT), wetland ecologists visited the referenced property on September 8 through 10 and 23, 2015. The purpose of the field survey was to review the wetland delineation performed by environmental consultants from Breedlove, Dennis and Associates, Inc. (BDA), and provide the Alachua County Environmental Protection Department (ACEPD) an independent assessment of the accuracy of the wetland limits. Wetland limits were provided to ECT from BDA in the form of hardcopy maps and electronic shapefiles. Limits of surface waters were unavailable at the time of the field assessment. Two representatives from BDA and one representative from Plum Creek were present for a majority of ECT's field assessment. The following presents ECT's findings and opinions.

ECT's focus was to evaluate the existing wetland lines set by BDA and visit additional areas based on a desktop review of the following data:

- National Wetlands Inventory (NWI).
- Florida Land Use, Cover and Classification System (FLUCCS).
- U.S. Geological Survey (USGS) topography.
- National Resource Conservation Service (NRCS) soils.

These data were reviewed prior to the field effort, and areas of potential interest (i.e., potential presence of wetlands/surface water) were selected for ground truthing. ECT's determination of wetland and surface water presence was based on the methods described in Chapter 62-340, Florida Administrative Code.

ECT's scientists evaluated approximately 4.19 miles of wetland lines delineated by BDA (Figure 1). These wetlands mostly consisted of forested or shrub communities, as these were the dominant wetland type on the property. ECT is in general agreement with these wetland delineations. The landward extent of wetlands often corresponded to a relatively broad ecotone of gradually changing vegetative and topographic conditions. As such, application of reasonable scientific judgement was necessarily employed to make some wetland line determinations. It is ECT's opinion that the wetland limits evaluated were based on acceptable application of wetlands delineation methods and were within the realm of reasonable scientific judgement. However, there

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were several areas where ECT believes the wetland limits should be moved 10 or 25 feet (ft) landward based on these criteria.

Figure 1 illustrates additional wetland/surface water areas initially identified via desktop assessment. Based on vegetative and hydrological conditions present at the time of the field assessment, it is ECT's opinion that all of these areas would be considered wetlands and/or surface waters.

It should be noted that at the time of the survey, because of the abundance of recent rains, standing water was prevalent throughout the site. Determination of hydric soils was difficult, because the soil samples fell apart when pulled out of the ground.

Surface waters such as ponds or intermittent water courses that hold and/or transport water on the ground surface, excluding wetlands, were not flagged onsite. BDA consultants stated that onsite surface waters were identified, and, although requested, this data was not provided to ECT. Intermittent connections and channelized drainages that may convey water from wetland to wetland on- and offsite only during high-water events were observed during the field survey. There was also evidence of seasonal ponding in low-lying areas onsite, which may not have been present at the time of BDA's field work.

In summary, it is ECT's opinion that the existing wetland lines delineated by BDA are acceptable. However, a more thorough field effort is needed to delineate other wetlands that were not included in the original wetland delineation, as well as surface water areas including ponds or intermittent water courses. Surface waters such as watercourses should be flagged and surveyed and added to the overall map for onsite wetland delineations. These resources are considered to be a regulated resource according to the Alachua County Land Development Code, Chapter 406, Article 6.

Should you have any questions or require additional information, please contact me at (352) 332-0444 or msochier@ectinc.com or Dr. Bochnak at abochnak@ectinc.com.

Sincerely,

ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.



Maya Scohier, PWS
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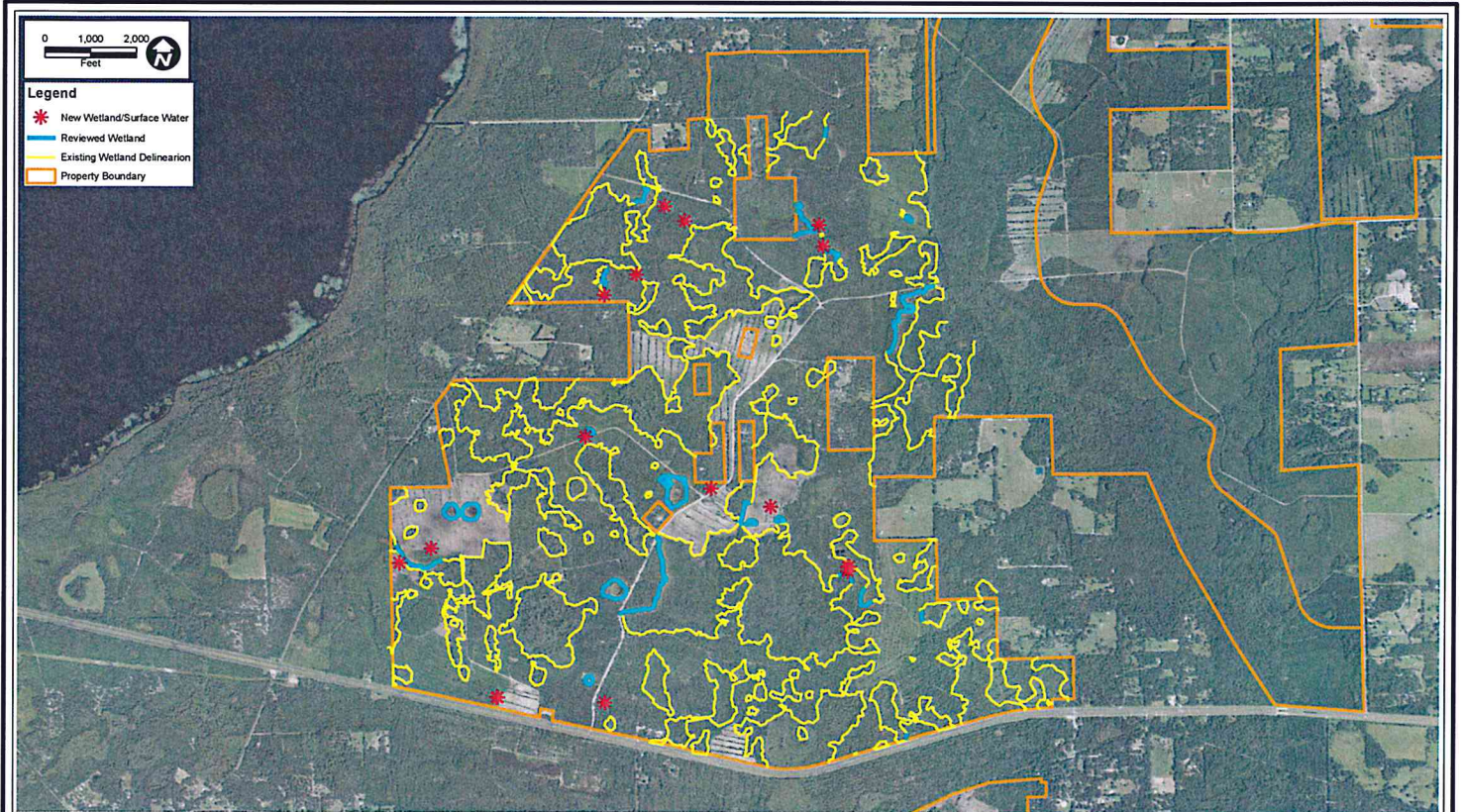


FIGURE 1.
FIELD ASSESSMENT

Sources: BDA Environmental Consulting, 2015; ECT, 2015.

ECT Environmental
Consulting &
Technology, Inc.

