



# **ENVIRONMENTAL ASSESSMENT REPORT**

**Gordy Road  
FORT PIERCE, FL**

***PREPARED BY:***  
**WGI, INC.**  
**2035 VISTA PARKWAY**  
**WEST PALM BEACH, FL 33411**  
**561-687-2220**

***PREPARED FOR:***  
**NVR., INC. D/B/A RYAN HOMES**

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## ENVIRONMENTAL FEASIBILITY REPORT

Gordy Road  
Fort Pierce, Florida  
December 1, 2025

### INTRODUCTION

The intent of this environmental report is to provide a preliminary assessment of the natural features within the below identified property including wetlands, uplands, and the potential for threatened and endangered species.

The subject property consists of three parcels totaling approximately 126.91 acres at 3605 Gordy Rd in Fort Pierce, Florida (Parcel Control Numbers: 2326-434-0000-000-0, 2326-413-0000-000-5, 2326-413-0001-000-2). Please refer to **Exhibit A** (Location Map) for details.

### SOURCES OF INFORMATION

Literature reviews, agency database searches and coordination, and a field review were conducted to document existing habitat types within and around the property. The information collected and databases reviewed included:

- U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Soil Map
- USDA NRCS Soil Survey of St. Lucie County, Florida, 1980
- Florida Association of Professional Soil Classifiers, Hydric Soils of Florida Handbook, 4<sup>th</sup> ed. (Hurt et. al. 2007)
- U.S. Fish and Wildlife Service (USFWS), Classification of Wetlands and Deepwater Habitats of the United States (Cowardin et. al. 1979; 2013)
- Florida Natural Areas Inventory (FNAI) Biodiversity Matrix (Matrix Unit ID 65561)
- National Wetland Inventory Maps
- Various Florida Fish and Wildlife Conservation Commission (FWC) GIS data layers
- USFWS, South Florida Ecological Services Office Wood Stork Florida Nesting Colonies Maps
- USFWS Critical habitat for threatened and endangered species mapper
- USFWS IPaC Planning Tool
- Florida Department of Transportation (FDOT) Florida Land Use, Cover and Forms Classifications System (FLUCFCS), 3<sup>rd</sup> ed., January 1999
- City of Fort Pierce Code of Ordinances
- Saint Lucie County Property Appraiser's Website
- South Florida Water Management District (SFWMD)

### SITE DESCRIPTION

Prior to the field review, the approximate boundaries of uplands and wetlands within the subject property were mapped on true color aerial photographs. Each community type was classified using FLUCFCS/FLUCCS (FDOT 1999).

WGI scientists familiar with Florida natural communities conducted a field review of the subject property on February 3, 2025. During this review, each vegetative community type was walked and visually inspected to verify community boundaries, dominant vegetation, and the presence or potential for occurrence of threatened and endangered species.

## SOILS

Based upon the USDA NRCS Soil Survey for St. Lucie County, Florida, seven soil types are mapped within the property. A soil map is included as **Exhibit B**. Listed below are each of the soil types found within the property and a general description of the characteristics of each soil type.

2) Ankona and Farmton sands: This poorly drained, nearly level soil is on broad flatwoods. The water table is within a depth of 10 inches for 1 to 4 months and between depths of 10 to 40 inches for 6 months or more during most years. Natural vegetation is south Florida slash pine, saw palmetto, wax myrtle, paw paw, inkberry, fetterbush, lopsided indiagrass, creeping bluestem, chalky bluestem, Florida three awn, and pineland three awn.

14) Fluvaquents, frequently flooded: This poorly drained, nearly level soil is on flood plains on marine terraces. The water table is within 6 inches for most of the year. Natural vegetation in the depressional areas is sandweed and stillingia. Blue maidencane and, in places cypress grow along the ridges of the depressional areas.

20) Kaliga Muck, frequently ponded, 0 to 1 percent slopes: This poorly drained, organic soil typically found in low-lying areas such as marshes, ponds, and depressions that are frequently ponded. Natural vegetation in the depressional areas is wax myrtle, bald cypress, spatterdock, duck potato, pickerelweed, and water hyssop.

37) Riviera sand, frequently ponded, 0 to 1 percent slopes: This poorly drained, nearly level soil is in depressional areas. This soil is ponded for 6 to 9 months or more annually. The water table is within a depth of about 40 inches for most of the rest of the year. Natural vegetation in the depressional areas is sandweed and stillingia. Blue maidencane and, in places cypress grow along the ridges of the depressional areas.

38) Riviera fine sand, 0 to 2 percent slopes: This poorly drained, nearly level soil is in hammocks and along drainageways. The water table is at a depth of less than 10 inches for 2 to 4 months in most years, and at a depth of 10 to 30 inches for most of the rest of the year. Natural vegetation is cabbage palms and scattered longleaf pine and slash pine and an understory of wax myrtle and saw palmetto. The most common native grasses are pineland three awn and blue maidencane.

44) Tantile and Pomona sands: This is typically well-drained to moderately well-drained sandy soils. These soils are often found in upland or slightly depressional areas and are generally associated with pine flatwoods, scrub, or prairie ecosystems, depending on the region. Natural vegetation is slash pines, cabbage palms, saw palmetto, longleaf pine, and wiregrass.

48) Wabasso sand, 0 to 2 percent slopes: This poorly drained, nearly level soil is in flatwoods areas. The water table is at a depth of less than 10 inches for 1 to 4 months during the summer rainy season and between depths of 10 to 40 inches for 6 to 9 months in most years. Natural vegetation is second growth longleaf pine or slash pine and scattered to many cabbage palms. The understory is saw palmetto, running oak, and in places inkberry

and fetterbush. The most common native grasses are Pineland three awn and Florida three awn and in places several varieties of bluestem.

### EXISTING LAND USES

Descriptions of the land use/cover types and the soil types that comprise the subject property are provided below. Existing land uses and natural habitats within the subject property were classified using the FLUCFCS (1999). Based on in-house and field review, five land use/cover types were determined to be present within the subject property. A map depicting the existing land use/cover types encountered within the subject property is provided as **Exhibit C** (Existing Land Use Map) and general descriptions of the land use/cover types are provided below.

### UPLAND COMMUNITIES

The upland habitat on the subject property is predominantly characterized by improved pasture, which serves as grazing land for cattle. Interspersed throughout the pasture are patches of native vegetation, including sabal palms, slash pines, laurel oaks, and live oaks. However, the upland areas also exhibit the presence of invasive species, notably Brazilian pepper.

#### 110- – Residential low density (3.13 AC.)

This category includes land that contains less than two dwellings per acre. This includes the three residential homes located on the subject property over 129.91 acres.

WGI scientists identified the following vegetation within the upland community type listed above. The following is a list of those species observed.

<u>Common Name</u>	<u>Scientific Name</u>	<u>Designation</u>
Sabal Palm	<i>Sabal palmetto</i>	Native
Bahia Grass	<i>Paspalum notatum</i>	Non-native
Live Oak	<i>Quercus virginiana</i>	Native

#### 211 – Improved Pasture (100.15 AC.)

This category in most cases is composed of land which has been cleared, tilled, reseeded with specific grass types and periodically improved with brush control and fertilizer application. This land use makes up the majority of the subject property and is being used to graze cattle.

WGI scientists identified the following vegetation within the upland community type listed above. The following is a list of those species observed.

<u>Common Name</u>	<u>Scientific Name</u>	<u>Designation</u>
Sabal Palm	<i>Sabal palmetto</i>	Native
Bahia Grass	<i>Paspalum notatum</i>	Non-native
Live Oak	<i>Quercus virginiana</i>	Native
Laurel Oak	<i>Quercus laurifolia</i>	Native
Giant Smutgrass	<i>Sporobolus indicus</i>	Invasive
Brazilian Pepper	<i>Schinus terebinthifolia</i>	Invasive

## WETLANDS AND OTHER SURFACE WATERS

WGI scientists familiar with Florida wetland communities conducted a field review of the subject property. The purpose of the field review was to delineate the limits of, and gather pertinent information about, any wetlands that may exist onsite. It is WGI's opinion that there are wetlands located on the property.

Delineation of wetlands regulated by the South Florida Water Management District (SFWMD) is done according to Chapter 62-340 Florida Administrative Code (F.A.C.), Delineation of the Landward Extent of Wetlands and Surface Waters. The *Florida Wetlands Delineation Manual* (Gilbert et al., 1995) serves as a guide to Chapter 62-340. The United States Army Corps of Engineers (USACE) will delineate federal jurisdictional wetlands according to 40 CFR Part 120, the Waters of the United States (WOTUS) rule. The USACE 1987 Wetland Delineation Manual serves as a guide to 40 CFR Part 120. In this evaluation, WGI used the intent and methodology of the manual to form the opinion that wetlands are located within the boundaries of the subject property. The wetland communities listed below were observed within the subject property. A wetland boundary map is included as **Exhibit D**.

### 510 – Canal/Ditch (8.83 AC.)

This category includes rivers, creeks, canals, and other linear water bodies. There are drainage ditches and creeks on the subject property from agricultural use that are connected to offsite canals via culverts.

### 534 – Reservoir less than 10 acres (1.84 AC.)

These communities are associated with depressions and drainage areas that are not associated with streams or lakes. Wetlands 3 and 4 are historic wetlands that were dredged and are now used as drainage/irrigation ponds.

### 630 – Wetland Forested Mixed (8.78 AC.)

This category includes mixed wetland forest communities in which neither hardwoods or conifers achieve 66 percent dominance in the canopy. There are two wetland areas on the subject property that are vegetated and forested.

<u>Common Name</u>	<u>Scientific Name</u>	<u>Designation</u>
Sabal Palm	<i>Sabal palmetto</i>	Native
Bamboo	<i>Bambusoideae</i>	Invasive
Sword Ferns	<i>Polystichum munitum</i>	Native
Duckweed	<i>Lemna minor</i>	Native

### 640 – Vegetated Non-forested Wetlands (4.18 AC.)

This category includes marshes and seasonably flooded basins and meadows. These communities are usually confined to relatively level, low-lying areas. There are two wetland areas on the subject property that are vegetated but not forested.

<u>Common Name</u>	<u>Scientific Name</u>	<u>Designation</u>
Southern cattail	<i>Typha domingensis</i>	Native
Bahia Grass	<i>Paspalum notatum</i>	Non-native
Dollar Weed	<i>Hydrocotyle umbellata</i>	Native
Pickerelweed	<i>Pontederia cordata</i>	Native

## THREATENED AND ENDANGERED SPECIES

In order to determine federal and state listed protected plant and animal species that have the potential to occur within the property, available site-specific data was collected and evaluated, and a field review of the subject property was conducted on February 3, 2025. The purpose of the field review was to identify any listed species present within the subject property, to assess the potential for the occurrence of protected species within the subject property, and to identify any critical habitat that might be located within or adjacent to the subject property. During the field review, the property was canvassed for direct observations of listed species or signs of their presence, including trails, tracks, scats, nests (cavity or stick), burrows, or calls.

The Florida Natural Areas Inventory (FNAI) biodiversity matrix identifies federal or state-listed plant and animal species as occurring or having the potential to occur within the subject property. The potential of occurrence for each species was ranked as Low, Moderate, or High based on the habitat requirements for each species, the presence of habitat within the property and documented occurrences of the species within one mile of the property.

- A Low ranking indicates that preferred habitat for that species was found within the project area, but the species has not been documented within one mile of the project area.
- A Moderate ranking indicates that suitable habitat exists, and the species has been documented within one mile of the project area.
- A High ranking indicates that suitable habitat exists, and the species was observed during field reviews.

The following table lists the protected species, their federal or state protection status, preferred habitat, and a ranking of potential for occurrence within the property based on the results of the FNAI biodiversity matrix search and the field review.

Species	Designated Status			Habitat Preference	Potential for Occurrence Onsite
	USFWS	FWC	DOACS		
<b>FAUNA</b>					
<b>REPTILIAN / AMPHIBIAN</b>					
Eastern indigo snake ( <i>Drymarchon corais couperi</i> )	T			Pine and scrubby flatwoods, high pine, dry prairie, edges of freshwater marshes, agricultural fields, coastal dunes, and human altered habitats	Low
Gopher tortoise ( <i>Gopherus polyphemus</i> )		T		Upland habitats with relatively well- drained, sandy soils. Usually inhabits longleaf pine and xeric oak sandhills, scrub, xeric hammock, pine flatwoods, dry prairie, coastal grasslands and dunes, mixed hardwood-pine communities, and a variety of disturbed habitats.	Low
Gopher Frog ( <i>Lithobates capito</i> )		SSC		Inhabits longleaf pine, xeric oak, and sandhills. Inhabits gopher tortoise burrows.	Low
<b>AVIAN</b>					

Florida burrowing owl ( <i>Athene cunicularia floridana</i> )		T		Open prairies in Florida that have very little understory vegetation. These areas include golf courses, airports, pastures, agriculture fields, and vacant lots.	Low
Florida scrub jay ( <i>Aphelocoma coerulescens</i> )	T			Sand pine and xeric oak scrub, and scrubby flatwoods, which occur in some of the highest and driest areas of Florida. Peninsular Florida's ancient sandy ridges and dune ecosystems or scrubs, which occur on well-drained to excessively well-drained sandy soils. The species does best in areas that contain large quantities of oak shrubs that average 3.28-6.56 feet in height.	Low
Crested Caracara ( <i>Caracara cheriway</i> )	T			Inhabits wet prairies with cabbage palms. It may also be found in wooded areas with saw palmetto, cypress, scrub oaks and pastures.	Moderate
Snail kite ( <i>Rostrhamus sociabilis</i> )	E			Inhabits shallow freshwater marshes and shallow grassy shorelines of lakes.	Low
Florida sandhill crane ( <i>Grus canadensis pratensis</i> )		T		Foraging habitat includes shallow (0-32 inches deep) herbaceous wetlands, improved pastures, prairies, open pine forests, croplands, golf courses, airports, and sod farms. Freshwater marshes are critical for nesting and roosting. Preferred habitat contains short vegetation (e.g., < 20inches in uplands).	Observed
Red-cockaded woodpecker ( <i>Picoides borealis</i> )	E			Suitable nesting habitat includes pine stands or pine-dominated pine/hardwood stands with a sparse understory and ample old-growth pines.	Habitat not onsite
Wood stork ( <i>Mycteria americana</i> )	T			Fresh and saltwater marshes, tidal flats, wet prairies, forested wetlands, flooded pastures, and ditches.	Moderate
Bald eagle ( <i>Haliaeetus leucocephalus</i> )	N/A	N/A	N/A	Nesting and roosting habitat consists of forested habitats with mature canopy trees. Preferred foraging habitat consists of expanses of shallow fresh or salt water that includes a diversity and abundance of prey and access to shallow water and tall trees/structures for perching.	Low
<b>MAMMALS</b>					
Florida panther ( <i>Puma concolor coryi</i> )	E			Habitat selection is related to prey availability and suitable habitat includes dense understory vegetation for stalking/feeding, resting, and denning. Preferred habitat is typically forested habitat types interspersed with other habitat types. The species requires large, contiguous areas.	Habitat not onsite

Legend:

USFWS = United States Fish and Wildlife Service

FWC = Florida Fish and Wildlife Conservation Commission DOACS = Florida Department of Agriculture & Consumer Services E = Endangered T = Threatened

SSC = Species of Special Concern

(S/A) = Threatened/Similarity of Appearance

N/A = Not Applicable

Low = Suitable habitat found within the project area, but no documented element occurrence of the species within one (1) mile of the project area and no observations were made during field reviews.

Moderate = Suitable habitat exists and the species has been documented within one (1) mile of the project area, but no observations were made during field reviews.

High = Suitable habitat exists and species was observed within the project area during field reviews.

The FWC wading bird rookery database was searched for active wading bird rookeries within one mile of the subject property. According to this FWC database, there are no active wading bird rookeries within one mile of the subject property.

The USFWS **wood stork (*Mycteria americana*)** colony website was searched for active wood stork colonies located within 18.6 miles of the subject property. This 18.6-mile distance corresponds to the core foraging area (CFA) established by the USFWS for the wood stork. According to the USFWS wood stork colony website, the subject property is located within the 18.6-mile CFA of three wood stork nesting colonies.

The Audubon Florida EagleWatch Nest Map was searched for **bald eagle (*Haliaeetus leucocephalus*)** nests within the vicinity of the subject property. According to the Audubon GIS map, there are no known nests located within the 330-foot or 660-foot buffer of any active bald eagle nests.

The subject property is located within the USFWS Consultation Area for the federally threatened **Audubon's crested caracara (*Caracara cheriway*)**, which is protected under the federal Migratory Bird Treaty Act (MBTA). Caracara habitat includes wet prairies, wooded areas with saw palmetto, cypress, scrub oaks, and pastures. It is WGI's opinion that suitable habitat is present on the subject property. No Audubon's crested caracara were observed during the site visit.

**Sandhill cranes (*Grus canadensis pratensis*)** and Sandhill crane nesting habitat were identified on the subject property so it is possible that construction activities in that area will be required to be performed outside of nesting season which is between January and May.

## FINDINGS AND DISCUSSION

Based on the above findings, there are natural features present on the subject property that are regulated by federal, state, and local agencies and permits will be required as part of the entitlement process. The following is a summary of the environmental permitting efforts required for each component of this subject property.

### WETLANDS AND OTHER SURFACE WATERS

It is WGI's opinion that there are approximately 14.8 acres of herbaceous and forested wetlands, and 8.83 acres of surface waters, on the subject property. Wetlands 3 and 4 are historic wetlands that were dredged and are now being used as irrigation/drainage ponds. It is WGI's opinion that the regulatory agencies may consider these areas wetlands and not "other surface waters" due to their historic wetland status. WGI's opinion is based on preliminary reconnaissance only; WGI has not conducted official wetland delineation services for this site. Furthermore, wetland boundaries can only be verified by state and/or federal regulatory agency involvement. The State of Florida Department of Environmental Protection (FDEP) has established the Environmental Resource Program (ERP) under Chapter 62-330, F.A.C. that governs the "construction, alteration, operation, maintenance, repair, abandonment, and removal of stormwater management systems, dams, impoundments, reservoirs, appurtenant works, and works (including docks, piers, structures, dredging, and filling located in, on or over wetlands or other surface waters, as defined and delineated in chapter 62-340, F.A.C.)". The FDEP has delegated authority for certain ERP activities to the South Florida Water Management District (SFWMD).

It is WGI's opinion that some of the wetlands present on the property may be federally jurisdictional, and therefore, a federal 404 Permit could be required for the development of the site. This project will require an

SFWMD individual permit and likely a USACE individual permit. WGI recommends that an approved jurisdictional determination from USACE be submitted as early as possible in the development process as USACE currently has a lengthy processing time (approximately 12-18 months) for 404 program related requests. Both agencies (SFWMD and USACE) require avoidance and minimization of impacts to wetlands prior to considering mitigation for impacting wetlands. The agencies may require some portion of the wetland to be preserved and enhanced unless there is adequate justification for impacting. Preservation of the wetland will require a conservation easement and preserve area management plan that will require maintenance of the wetland in perpetuity. Any impacts to the wetland will require compensatory mitigation. The preferred method of mitigation under federal regulations is via the purchase of mitigation credits from an approved mitigation bank that services the project area.

While WGI has provided reasonable estimates; ultimately, the regulatory agencies have final approval of the jurisdiction, quality, and amount of mitigation required for wetlands on the subject property, and therefore the estimates provided in this report may not match the final requirements.

#### THREATENED AND ENDANGERED SPECIES

Listed species are afforded special protective status by federal and state agencies. This special protection is federally administered by the United States Department of the Interior, USFWS pursuant to the Endangered Species act of 1973 (as amended). The USFWS administers the federal list of animal species (50 CFR 17.11) and plant species (50 CFR 17.12).

The State of Florida affords special protection to animal species designated as State designated threatened or species of special concern, pursuant to Chapter 68A-27, F.A.C., which is administered by the FWC. In November 2010, a revision to the FWC threatened species rules changed the designation of federal listed species that occur in Florida to federally designated endangered or federally designated threatened species. Those species that are only state listed are now designated as State threatened or State species of special concern.

The State of Florida also protects and regulates plant species designated as endangered, threatened or commercially exploited as identified on the Regulated Plant Index (5B- 40.0055, F.A.C.), which is administered by the Florida Department of Agriculture and Consumer Services (FDACS), Division of Plant Industry, pursuant to Chapter 5B-40, F.A.C.

The subject property lies within several critical habitats and consultation zones for state and federally protected species. Each of these species requires specific considerations during the permitting process to ensure compliance with the Endangered Species Act (ESA) and applicable state regulations.

The subject property is located within the USFWS Consultation Area for the **wood stork (*Mycteria americana*)**. Surface waters and wetlands with a seasonal high-water depth between 2 inches and 15 inches with 25 percent aquatic vegetation coverage or less are considered suitable foraging habitat (SFH) for the wood stork. SFH for the wood stork is present on the subject property. The USFWS will require consultation during the review process to ensure that there is no net loss of SFH. This no net loss of SFH is usually accomplished through the development of stormwater retention ponds and the planted littoral zones. A wood stork prey base analysis will be performed, if required, to quantify the offset of SFH in cases where more than five acres of SFH is impacted. Offsite mitigation can also be purchased from a wetland mitigation bank to offset SFH loss.

The subject property is located within the USFWS Consultation Area for the federally threatened **Eastern indigo snake (EIS, *Drymarchon corais couperi*)**. The property will be reviewed by the USFWS for a Section 7 Consultation for the EIS as it is anticipated that at least 25 acres or more of land would be altered for any proposed project development. Based on August 1, 2017, guidance from the USFWS regarding consultation measures for EIS, it is anticipated a project would “key out” for a determination of “may affect” EIS habitat, assuming a path of A > B > C > may affect. Informal consultation with USFWS will be required to determine if mitigation is required. Usually, mitigation is only required in cases where documented observations of EIS have been recorded on the property or nearby. If USFWS determines that the project “may affect” EIS habitat, there will be required compensatory mitigation for lost EIS habitat.

The subject property is located within the USFWS Consultation Area for **Audubon’s crested caracara (*Caracara ceriway*)**. Suitable habitats are dry or wet prairie areas with scattered sabal palms. It is WGI’s opinion that suitable habitat for Audubon’s crested caracara is present on the property. As such, it is anticipated that a USFWS consultation will be required for this species. USFWS may require a survey to determine if the subject property contains any nests or is being used for foraging. Consultation with USFWS will be required for any lawful activities that may result in the take of endangered or threatened animal species. Rather than perform a survey which is labor and time intensive, it may be preferred to assume the presence of caracara on the site and pursue an Incidental Take Permit (ITP). As part of the ITP application, a habitat conservation plan (HCP) will need to be prepared in reference to the Audubon’s crested caracara and meet the ESA section 10(a)(1)(B) incidental take permit issuance criteria and a contribution fee to the Fish and Wildlife Foundation of Florida’s Caracara Conservation Fund. The HCP will outline the anticipated effects of the proposed taking, how the impacts will be mitigated and minimized, and how the conservation measures included in the plan will be funded.

On February 3, 2025, sandhill cranes and potential nesting habitat were observed on the subject property. **Florida sandhill cranes (*Grus canadensis pratensis*)**, along with their active nests, eggs, and young, are protected under the Federal Migratory Bird Treaty Act, as well as state regulations Rule 68A-16.001 and Rule 68A-4.001, F.A.C. Sandhill crane nesting season occurs between January and May, with nests typically found in seasonally flooded emergent wetlands such as freshwater marshes. The site may provide foraging habitat for Florida sandhill cranes, while the wetlands in the southeastern portion of the property could serve as potential nesting areas. The Florida Fish and Wildlife Conservation Commission (FWC) recommends conducting nesting surveys before any construction activities, particularly during the breeding season from December through August. Since Florida sandhill cranes do not reuse the same nesting sites annually, surveys may need to be conducted each year if construction is ongoing. If active nests are identified onsite, the Species Conservation Measures and Permitting Guidelines advise establishing a 400-foot buffer around the nest to minimize human disturbance. Pre-construction surveys should be conducted within 30 days of project initiation and must include either one aerial survey or two ground surveys. To avoid the need for an FWC take permit, activities should not impact natural wetlands used by sandhill cranes for breeding, feeding, or sheltering. A 400-foot buffer must be maintained around active nests, and if flightless young are present, land use conversion within 1,500 feet of the nest should be avoided until they are capable of sustained flight, typically within 70 days of hatching.

During the field review on February 3, 2025, no evidence of gopher tortoises, burrowing owls or their burrows were observed on the property.

## UPLANDS AND TREES

Mitigation for trees is not necessary if at least 25% of the site's upland habitat is preserved. A tree survey and removal permit are required. Mitigation is required for the removal of any native tree at least 14 inches DBH, except palms, which must have a minimum clear trunk of ten feet. If trees are to be mitigated on-site the mitigation plan must include: replacement trees (preserved, relocated, or newly planted) of the same or another native species. Replacement trees must exceed minimum landscape requirements and be at least 12 feet tall and 2½ inches DBH, except palms, which must have a ten-foot clear trunk. Trees must be replaced at a ratio of one inch DBH for each inch removed, with palm trees preserved or relocated counting one-for-one towards mitigation.

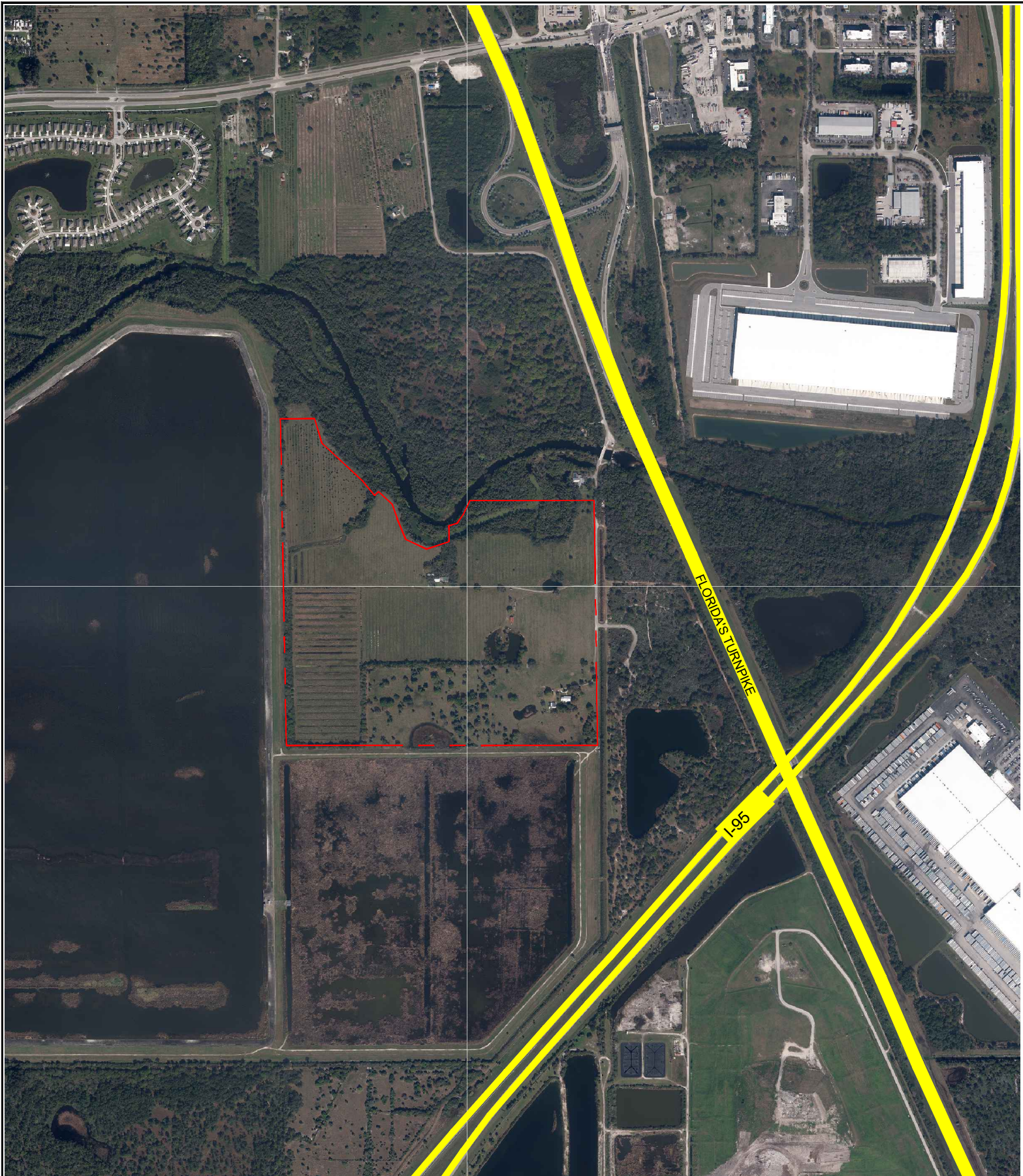
The onsite uplands consist primarily of vegetated improved pasture, with a few scattered residential areas and associated yard vegetation. These upland areas are heavily managed and lack the structure and species diversity characteristic of native upland communities. As a result, the site does not contain any high-quality upland habitat, and the existing uplands provide minimal ecological value beyond their current agricultural and residential use.

## CONCLUSION

- Uplands and Trees:
  - A vegetation removal permit will be required, and mitigation for tree removal may be waived if at least 25% of the site's upland habitat is preserved.
  - Mitigation is necessary for removing native trees at least 14 inches DBH (10-foot clear trunk for palms). On-site mitigation must include native replacement trees exceeding landscape requirements, with a one-inch DBH replacement per inch removed. Preserved or relocated trees count fully, while newly planted trees count as half credit. Property owners must maintain mitigation trees, with a 12-month inspection and a 60-day correction period if noncompliant. If on-site mitigation is not feasible, applicants may plant on public land with city approval or pay a fee to the city's Tree Preservation Fund.
  
- Wetlands and Other Surface Waters: There are approximately 14.8 acres of herbaceous and forested wetlands, and 8.83 acres of surface waters, on the subject property. Wetlands 3 and 4 are historic wetlands that were dredged and are now being used as irrigation/drainage ponds. It is WGI's opinion that the regulatory agencies may consider these areas wetlands and not "other surface waters" due to their historic wetland status. An official wetland delineation is recommended to confirm the boundaries of the suspected wetlands. Some of the wetlands on the subject property likely fall under the jurisdiction of the USACE, requiring an Approved Jurisdictional Determination (AJD) to confirm. Additionally, the project will necessitate an Individual Environmental Resource Permit (ERP) from the SFWMD and possibly an Individual Permit from USACE.
  
- Listed Species:
- Consultation with USFWS and FWC will take place through the required wetland permitting with SFWMD and USACE.
  - **Audubon's Crested Caracara**
    - The property is within the USFWS Consultation Area for the species and the USFWS may

require a survey to determine if the property contains nests or is used for foraging. Survey protocol requires monitoring the entire subject property plus a 1,500-meter radius buffer around the subject property. Monitoring must be done at a certain time of year (from January to April) so caracaras should be considered in project scheduling.

- If a survey is requested by the USFWS, it may be more efficient to assume the presence of the caracara, in which case an Incidental Take Permit (ITP) may be required along with the preparation of a Habitat Conservation Plan.
- **Wood Stork**
  - Suitable foraging habitat mitigation can be provided by creating habitat through the proposed stormwater management system (shorelines of lakes and ponds) and/or purchasing wetland mitigation credits. The impact to wood stork habitat is unlikely to incur additional mitigation costs above and beyond the mitigation needed for other wetland impacts.
- **Florida Sandhill Crane**
  - To avoid the need for an FWC take permit, activities should not impact natural wetlands when there are active nests. A 400-foot buffer must be maintained around active nests. If eggs or flightless young are present, land use conversion within 1,500 feet of the nest should be avoided until they reach sustained flight, typically at 70 days old.
- **Eastern Indigo Snake**
  - USFWS consultation will be required which will occur during wetland permit review with SFWMD and USACE. This generally does not require additional permitting or mitigation costs above and beyond wetland and stormwater permitting.



SOURCE: GOOGLE EARTH PRO

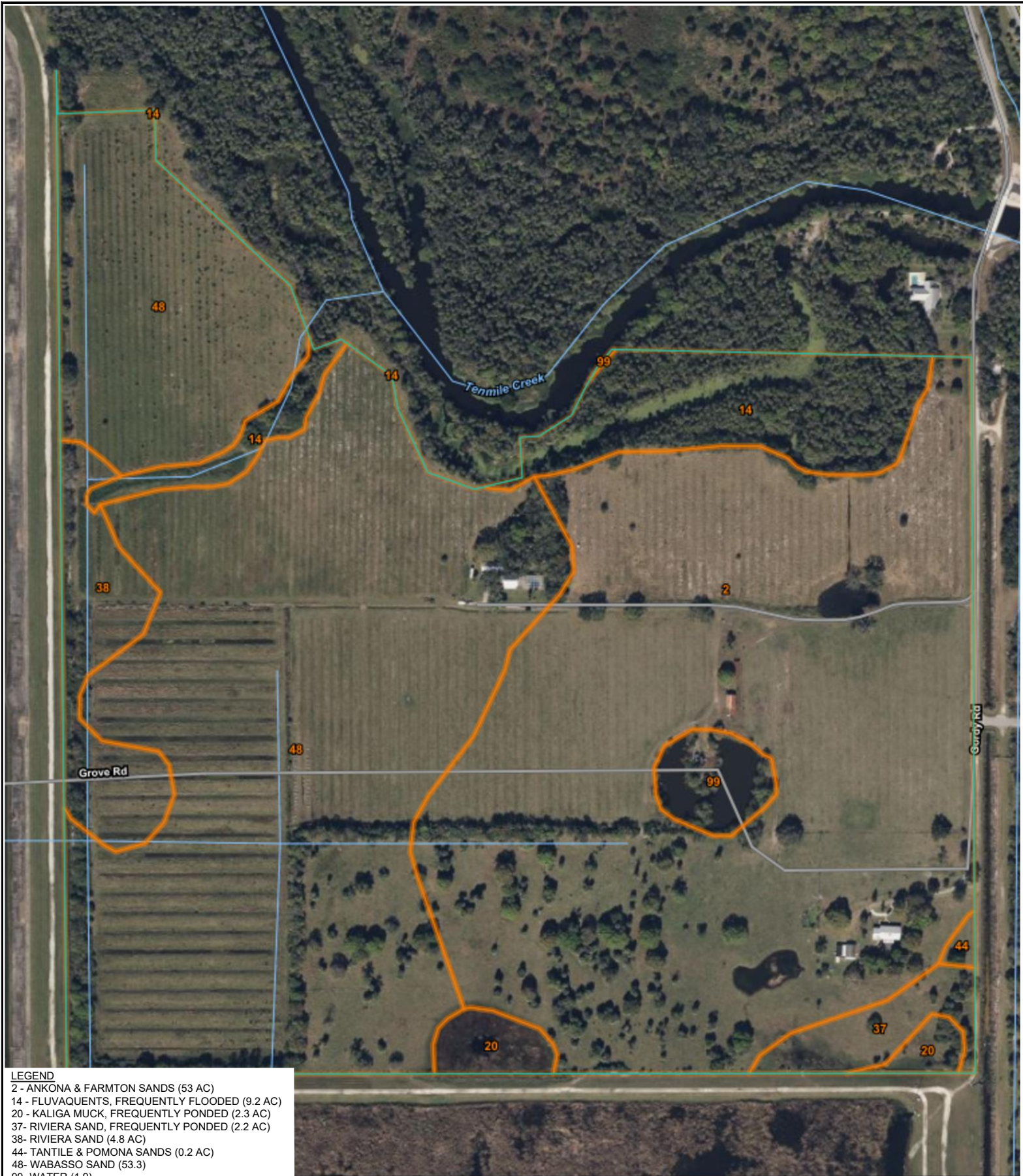
PROJECT NAME: GORDY ROAD  
PROJECT #: 11131.00  
DATE: 02/07/25  
CREATED BY: AMS  
CHECKED BY: RMH

# LOCATION MAP EXHIBIT A



PHONE NO. 561.687.2220  
CERT NO. 33574  
LB NO. 7055  
2035 VISTA PARKWAY  
WEST PALM BEACH, FL 33411





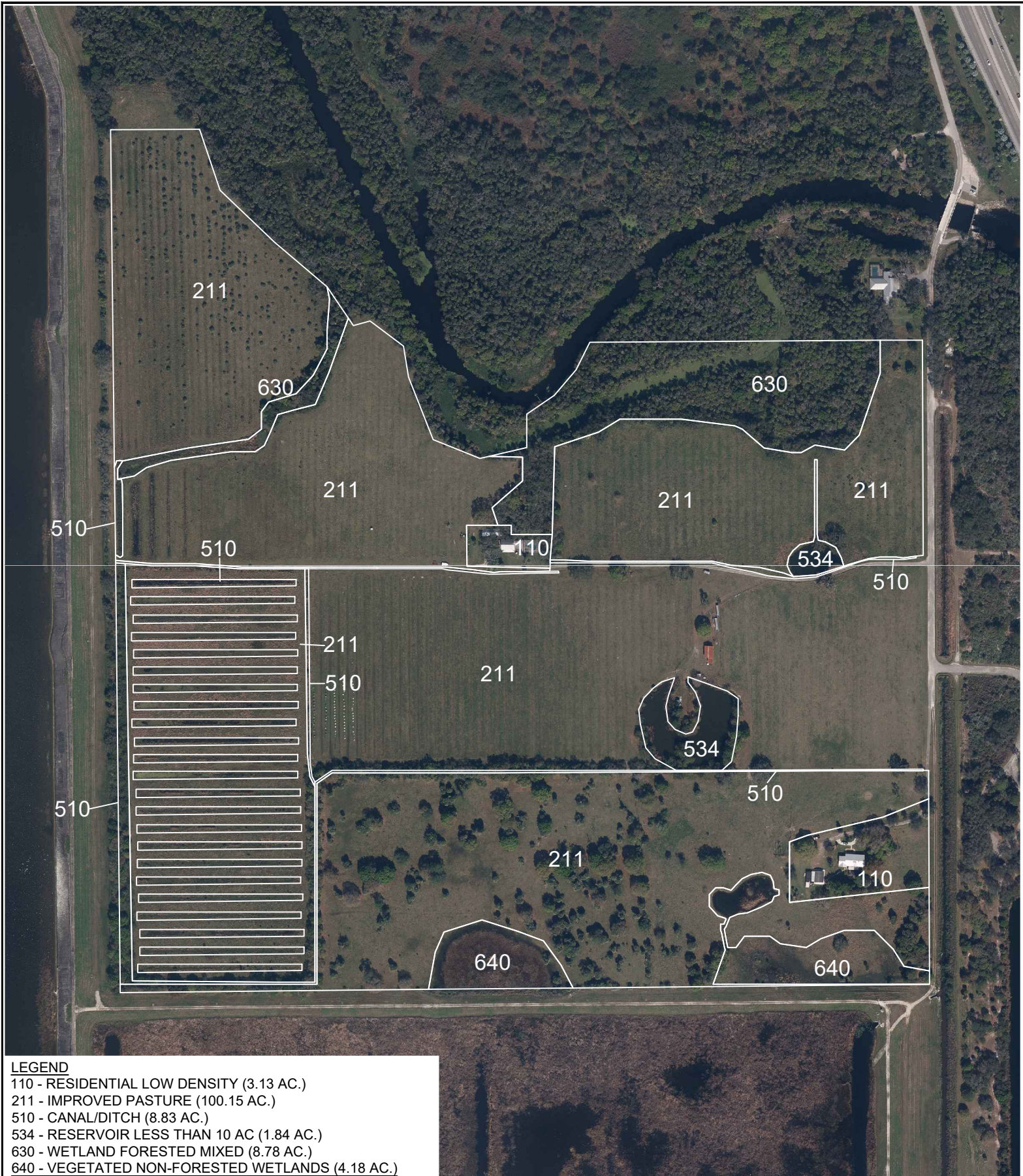
SOURCE: USDA WEB SOIL SURVEY

PROJECT NAME: GORDY ROAD  
 PROJECT #: 11131.00  
 DATE: 12/01/25  
 CREATED BY: CAO  
 CHECKED BY: RMH

## SOIL SURVEY MAP EXHIBIT B

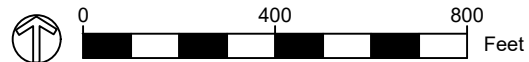


PHONE NO. 561.687.2220  
 CERT NO. 33574  
 LB NO. 7055  
 2035 VISTA PARKWAY  
 WEST PALM BEACH, FL 33411



**LEGEND**  
 110 - RESIDENTIAL LOW DENSITY (3.13 AC.)  
 211 - IMPROVED PASTURE (100.15 AC.)  
 510 - CANAL/DITCH (8.83 AC.)  
 534 - RESERVOIR LESS THAN 10 AC (1.84 AC.)  
 630 - WETLAND FORESTED MIXED (8.78 AC.)  
 640 - VEGETATED NON-FORESTED WETLANDS (4.18 AC.)  
 TOTAL = 126.91 AC.

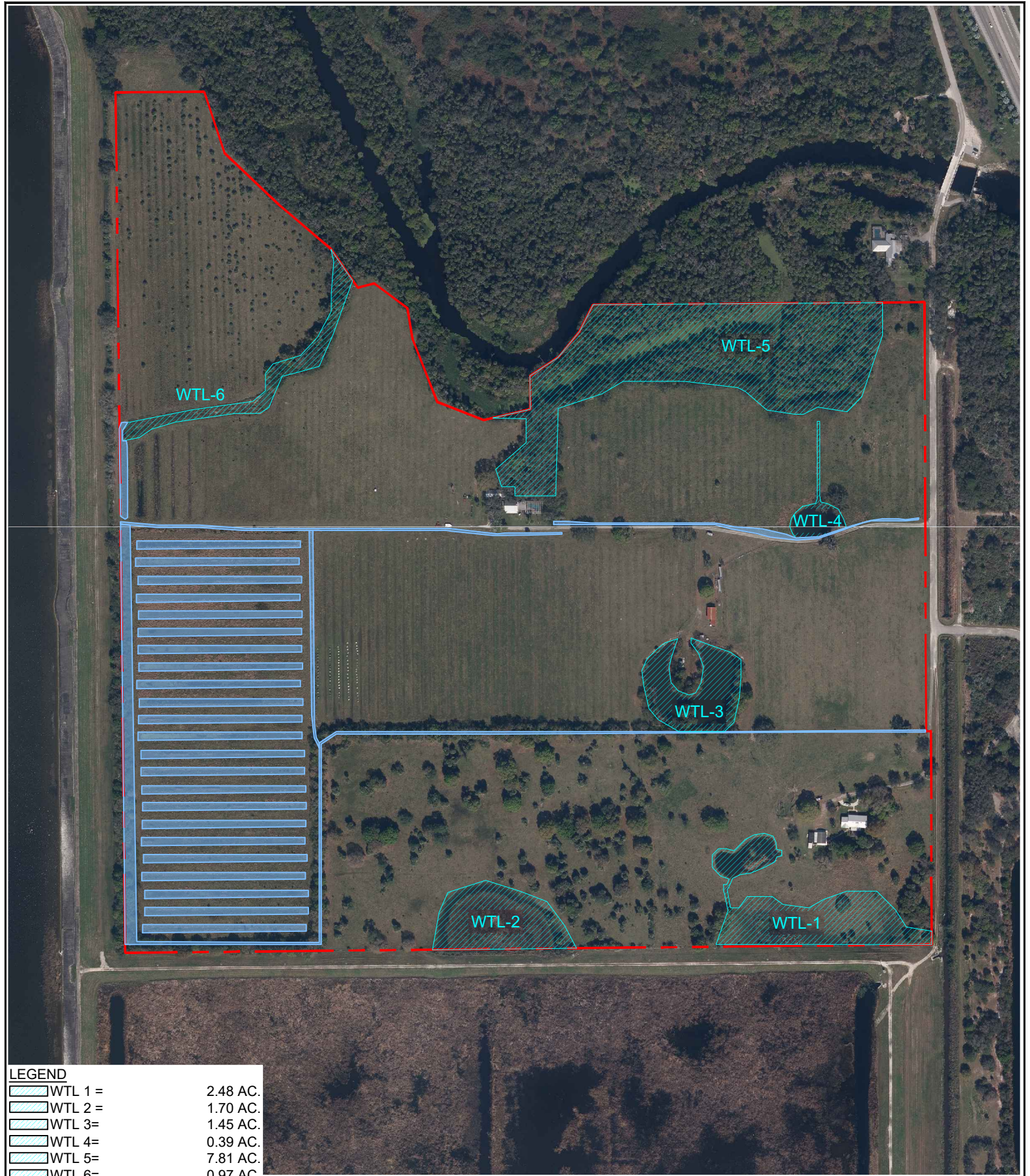
SOURCE: FDOT AERIALS GIS



PROJECT NAME: GORDY ROAD  
 PROJECT #: 11131.00  
 DATE: 12/01/25  
 CREATED BY: CAO  
 CHECKED BY: RMH

LAND USE MAP  
 EXHIBIT C

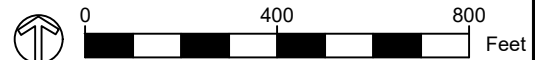
PHONE NO. 561.687.2220  
 CERT NO. 33574  
 LB NO. 7055  
 2035 VISTA PARKWAY  
 WEST PALM BEACH, FL 33411



**LEGEND**

	WTL 1 =	2.48 AC.
	WTL 2 =	1.70 AC.
	WTL 3 =	1.45 AC.
	WTL 4 =	0.39 AC.
	WTL 5 =	7.81 AC.
	WTL 6 =	0.97 AC.
	TOTAL =	14.8 AC.
	SURFACE WATERS =	8.83 AC.

SOURCE: FDOT AERIALS GIS



PROJECT NAME: GORDY ROAD  
 PROJECT #: 11131.00  
 DATE: 12/01/25  
 CREATED BY: CAO  
 CHECKED BY: RMH

## WETLAND BOUNDARY MAP EXHIBIT D



PHONE NO. 561.687.2220  
 CERT NO. 33574  
 LB NO. 7055

2035 VISTA PARKWAY  
 WEST PALM BEACH, FL 33411

Exhibit E



Photo Number: 1	View of one of the southern wetlands on the subject property that is possibly suitable foraging and nesting habitat for sandhill cranes.
Photo date: 2/03/2025	
Direction: S	



Photo Number: 2
Photo date: 2/03/2025
Direction: S

View of the southern wetland and Sandhill Cranes.



Photo Number: 3	View of the southern residential area with some large specimen oaks.
Photo date: 2/03/2025	
Direction: NE	



Photo Number: 4
Photo date: 2/03/2025
Direction: W

View of the cattle pasture showcasing possible Audubon Crested Caracara habitat.



Photo Number: 5
Photo date: 2/03/2025
Direction: W

View of one of the drainage ditches that flows into an offsite canal.



Photo Number: 6
Photo date: 2/03/2025
Direction: N

View of a wet area near one of the drainage ditches.



Photo Number: 7
Photo date: 2/03/2025
Direction: NW

View of the centrally located pond by the maintenance area.