March 27, 2018

Stephen Mayer
City of Stuart, Development Department
121 SW Flagler Ave.
Stuart, FL 34994

Re: Response to EW Consultants Environmental Review
Martin Memorial CPUD
Indian Street Parcel

Dear Mr. Mayer:

The purpose of this letter is to provide a written response to the Memorandum from EW Consultants dated March 16, 2018 regarding an environmental review of proposed Martin Memorial CPUD in accordance with the City of Stuart. Each item of concern is addressed as follows:

Section 5.02.00 – Environmental Assessment Report

Vegetative Description

The combined site is ± 13.6954 acres within two parcels (7.91 and 5.7854 acres), and further located within Section 40, Township 38S, Range 41E, Martin County, Florida. It is located at the northeast corner of Kanner Highway and Indian Street in Stuart. The Martin County Property Appraiser Parcel ID Numbers are 40-38-41-001-013-00000-2 and 40-38-41-001-011-00000-0. A site location map (Exhibit 1) is attached.

Based on a review of the Soil Survey of Martin County Area, Florida (April, 1981), the site is composed of Salerno Sand (#35), Arents (#36) and Hobe Fine Sand (#61). Salerno Sand (#35) is a poorly drained soil that is nearly level and is found in broad areas of flatwoods. The surface layer for this soil type is typically black to very dark gray to brown fine sand, with a subsurface layer of dark gray to brown. The typical vegetation for this soil, on undisturbed sites, is South Florida Slash Pine, Saw Palmetto, Gallberry, Fetterbush, Wax Myrtle, Creeping Bluestem, Broomsedge Bluestem, Chalky Bluestem, Pineland Threeawn, and Panicums. Arents (#36) is a poorly drained to moderately well drained soil that is nearly level. The surface layer for this soil type is typically light brownish gray fine sand. Hobe Fine Sand (#61) is an excessively drained soil that is nearly level to gently sloping and is found on knolls and ridges in coastal areas of flatwoods. The typical vegetation consists of Sand Live Oak, Saw Palmetto, Fetterbush, Threeawn, Panicums and other grasses. The surface layer for this soil is typically gray fine sand with a subsurface layer of gray, white, and light gray fine sand. A soil map is attached for your review.

Based on the information from the Hydric Soils of Florida Handbook, third edition (March, 2000), Salerno sand is listed as 30% hydric. Arents and Hobe Fine Sand are not listed as having any hydric components.

There are multiple excavated ponds located on the southeastern portion of the property. Historical aerial photographs revealed that this area was previously utilized as a fish farm. Two substantial ditches were observed on this parcel. One ditch runs from north to south along the western edge of the property, and the other is located mainly on the northern portion of the parcel. Based on a review by the South Florida Water Management District and the US Army Corps of Engineers, there are State and Federal wetlands on the site. The wetlands have been severely impacted by invasive plant species.

A separate vegetative description for each FLUCCS code is included within an attached map.

Wetland Delineation

A determination of wetland boundaries was performed by the South Florida Water Management District and EDC, Inc. and Permit No: 43-100160-P was issued March 12, 2018. Based on the State review, there are three isolated wetlands located on the property; each is less than 0.30 acres. The following table describes the wetlands on the site as per the permit:

ID	Acres	Action	Vegetative Description	Current Score	With Project Score	UMAM Loss
1	0.28	Direct Impact	Mixed Wetland Hardwoods		0	0
2	0.13	Direct Impact	Hydric Pine Flatwoods		0	0
3	0.06	Direct Impact	Hydric Pine Flatwoods		0	0

Attached is a copy of the map (Exhibit 4) demonstrating the location and approved limits of onsite wetlands. Please note, the SFWMD vegetative description is not indicative of the invasive and exotic species within the wetland areas.

The first wetland is located in the southwest corner of the property. It occupies 0.28 acres of the parcel and is of relatively poor quality. Dominant vegetation consists of exotic species such as Melaleuca (*Melaleuca quinquenervia*) and Old World Climbing Fern (*Lygodium microphyllum*).

The second wetland is near the northwest property corner. It is 0.13 acres in size and is also of relatively poor quality. Dominant vegetation consists of exotic species such as Melaleuca (*Melaleuca quinquenervia*) and Old World Climbing Fern (*Lygodium microphyllum*).

The third and final wetland is located on the eastern edge of the parcel, approximately midway between the northern and southern boundaries. This wetland is the smallest of the three,

at 0.06 acres. Dominant vegetation consists of Slash Pine (*Pinus elliottii*) and Melaleuca (*Melaleuca quinquenervia*) with an understory of grasses.

The US Army Corps of Engineers (ACOE) issued a Public Notice (PN) for the parcel on February 14, 2018. The following is an excerpt from the PN describing the Federal wetlands on the parcel:

"The project site contains 7.16 acres of uplands including Brazilian pepper (Florida Land Use Classification Code System (FLUCCS) 422) and mixed hardwoods (FLUCCS 438), 0.28 acres of exotic wetland hardwoods (Wetland 1, FLUCCS 619), 0.19 acres of hydric pine flatwoods (Wetland 2, FLUCCS 625), 0.06 acre of hydric pine flatwoods (Wetland 3, FLUCCS 625), 0.13 acres of abandoned aquaculture ponds (Wetlands 4-10, FLUCCS 254), and 0.16 acres of a tributary (FLUCCS 510). Wetland 1 is located in the southwest portion of the project site and is connected to a drainage ditch that extends to the north central portion of the property."

The ACOE permit is still currently under review. A copy of the permit will be submitted to the City of Stuart when issued.

Wildlife Evaluation

EDC, Inc. conducted a pedestrian survey throughout the property to investigate for the presence of any listed plant or animal species in accordance with City of Stuart requirements. No Federally listed species were observed on the parcel. However, during the January 2018 another gopher tortoise survey was conducted and documented one gopher tortoise burrow on the site.

Additionally, requests were submitted to Florida Fish and Wildlife Conservation Commission and the US Fish and Wildlife Service for database searches of listed species on or adjacent to the subject parcel. Florida Fish and Wildlife Conservation Commission responded and stated, "No records of listed species occurrence from the Florida Fish and Wildlife Conservation Commission database were located within the project area." No response has been received from the US Fish and Wildlife Service.

Preserve Area

The First Eastern Properties PUD(c), dated October 27, 1992, Item 14, Preserve Areas, states "The upland preservation requirement for this PUD(c) is being met by the preservation of the required acreage of habitat within the First Eastern Properties PUD(r) which lies adjacent to this PUD(c). This arrangement is desirable to enhance the value of the total habitat being preserved for the benefit of the two PUDs and to protect wetlands within the First Eastern Properties PUD(r)."

The First Eastern Properties PUD(r), dated October 27, 1992, Item 15 M, Preserve Areas, states that the amount of upland preservation required to satisfy the upland preservation requirement for

both the PUD(r) and the PUD (c) is no less than 11.23 acres. According to the Martin County Final Preserve Area Management Plan for PUD (r), "To meet the upland preserve requirement of both the PUD(c) and the PUD(r), approximately 11.18 acres of upland preserve area is required per the approved First Eastern PUD(r) master plan and PUD agreement. The proposed final development plan for the Crossings at Indian Run…identifies a total of 13.3 acres of native upland habitat set aside as preserve areas." "This combination of preserve area creates a semi-continuous preserve area and is an innovative approach which maximizes wetland protection, listed species protection, preserve area management, passive recreational opportunities and overall wildlife utilization. Based on this arrangement, no preserve areas are required within the PUD(c) and the preserve area management plan requirements become the sole responsibility of the owner of the Crossings at Indian Run."

The preserve areas noted above have been verified (formerly) by City of Stuart staff and the above statements were codified as part of the (former) Shoppes at Gateway PUD.

Section 5.03.00 – Wetlands

An ERP was submitted to SFWMD and approved on March 12, 2018. The US Army Corps of Engineers permit is currently being processed and will be submitted to the City of Stuart when issued. Please note, mitigation for wetland impacts has been completed via a transfer of credits from Bluefield Mitigation Bank.

Section 5.04.00 – Environmentally Sensitive Lands

Please see response to Preserve Area under Section 5.02.00 – Environmental Assessment Report above.

Section 5.05.00 – Trees

Please see response to Preserve Area under Section 5.02.00 – Environmental Assessment Report above. Additionally, under the Shoppes at Gateway PUD, the City of Stuart reviewed the trees on the site and accepted the submission and subsequent ownership transfer of an offsite parcel. The land transfer satisfied the requirements of the tree mitigation for the 7.91 acre parcel. Subsequently, the City of Stuart requested the applicant complete a "verification" tree survey to determine the current size of trees on the parcel. The verification survey was to define if the completed mitigation still satisfied the onsite debit.

Additionally, the applicant will be impacting a minor portion of the southern boundary of the 5.7854 acre parcel. A separate tree survey was completed for this parcel and is submitted herein for review.

Based on the comments from the City's environmental reviewer, a site visit will be conducted on April 4, 2017 to determine the final debits within the current proposed project. A tree mitigation plan will then be submitted under separate cover to finalize the proposed tree mitigation.

Objective A.5 Natural Systems –

Comment Noted

Objective A.6 – Wildlife Protection –

Comment Noted

Please feel free to contact me at (772) 223-5200 if you have any questions or if additional information is required.

Sincerely,
EDC, Inc.

Tobin R. Overdorf
Vice President

cc: Ed Weinberg, EW Consultants, Inc.
Matt Kelly, MMHS
Steven Garrett, Lucido & Associates
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