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Miami, FL 33135
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Memo

Date:	October 28, 2022
To:	Jason James, P.E., Project Manager
From:	David Landers, Senior Environmental Scientist
Re:	Homestead Self Storage, Miami-Dade County, Florida **Preliminary Wetland Jurisdiction Assessment**
CPH Job No.:	F17801

CPH, LLC (CPH), Environmental Services, conducted a preliminary wetland jurisdiction assessment on a property located in Section 19, Township 57 South, Range 39 East, in the City of Homestead, Miami-Dade County, Florida. The 2.68-acre subject property is located on the south side of SW 328th Street (aka SE 8th Street) immediately northwest of Florida's Turnpike (SR 821) (**Figure 1, attached**). The purpose of this preliminary assessment is to provide: 1) a general estimate of the extent and configuration of areas expected to fall within the wetland regulatory jurisdiction of the Florida Department of Environmental Protection 404 Program (FDEP 404) and the South Florida Water Management District (SFWMD); and 2) a preliminary assessment of the quality of the on-site wetland habitats, if applicable. A CPH environmental scientist conducted the field investigation on October 6, 2022.

Property Description

The subject property is an undeveloped field. Historical aerial photographs indicate the subject property was in agricultural use from at least 1994 until 2019. At the time of the field investigation, the subject property was vegetated with a variety of shrubs, grasses and other herbaceous vegetation. The predominant plant species observed were scarlett ammannia (*Ammannia coccinea*), danglepod (*Sesbania grandiflora*), fall panicgrass (*Panicum dichotomiflorum*), switchgrass (*Panicum virgatum*), Peruvian primrose (*Ludwigia peruviana*), sedges (*Cyperus* spp.), wild Taro (*Colocasia esculenta*) and swamp smartweed (*Persicaria hydropiperoides*).

The *Soil Survey of Dade County Area, Florida,* identifies three (3) soil types within the subject property boundaries (**Figure 2, attached**). A summary of the characteristics of these soil types as described by the USDA Natural Resource Conservation Service (formerly Soil Conservation Service) are as follows:

> **Pennsuco marl, drained**
> This deep, nearly level, poorly drained soil is on broad, low coastal flats and in transverse glades. Slopes are smooth or concave and are less than 1 percent. During most years the water table in the

Pennsuco soil remains within a depth of 10 inches for 2 to 4 months and is at a depth of 10 to 40 inches for the rest of the year. Permeability is moderately slow. The *Hydric Soils of Florida Handbook*, *Fourth Edition* (Hurt 2007), lists this soil as hydric. Hydric soils typically support wetland habitats in undrained areas.

Perrine marl, drained

This deep, nearly level, poorly drained soil is on broad, low coastal flats and in transverse glades. Slopes are smooth or concave and are less than 1 percent. Under natural conditions, the Perrine soil has water above the surface for 1 to 3 months during most years. During most years the water table remains within 10 inches of the surface for 2 to 4 months and is at a depth of 10 to 30 inches for most of the rest of the year. Permeability is moderately slow. The *Hydric Soils of Florida Handbook*, *Fourth Edition* (Hurt 2007), lists this soil as hydric. Hydric soils typically support wetland habitats in undrained areas.

Udorthents, marl substratum – Urban land complex

About 40 to 70 percent of this map unit consists of Udorthents in open areas, and 25 to 60 percent consists of Urban land, or areas covered by concrete and buildings. The Udorthents consist of heterogeneous geologic material that has been excavated and spread. The Udorthents and Urban land occur as areas so intermixed or so small that mapping them separately is impractical. Slopes are 0 to 2 percent. The Udorthents are in areas of lawns, vacant lots, parks, and playgrounds. The Urban land consists of streets, driveways, sidewalks, parking lots, buildings, and other structures in areas where the soil is covered and cannot be readily observed. Depth to the water table in the Udorthents is dominantly more than 40 inches, but it varies, depending on the thickness of the fill material. Permeability is moderately slow or moderate in the layers of marl.

Wetlands & Surface Waters

According to wetland delineation methodologies outlined in the *Corps of Engineers Wetland Delineation Manual* (1987), the *2008 Corps Interim Regional Supplement to the Corps Wetland Delineation Manual: Atlantic & Gulf Coastal Plain Region* and the State of Florida Unified Wetland Delineation Methodology (Section 62-340, F.A.C.), habitats classified as wetlands were observed within the subject property boundaries during the October 6, 2022 field investigation.

South Florida Water Management District

The SFWMD regulates wetlands that are isolated and those considered within or connected to "Waters of the State" pursuant to Chapter 403 of the Florida Statutes, Rules 62-302 and 62-330 of the Florida Administrative Code (F.A.C.). Development activities altering wetlands and/or drainage will require an Environmental Resource Permit (ERP) from the SFWMD. Different ERP Permits for various activities,

General Permits and exemptions, can be found in the *State of Florida Environmental Resource Permit Applicant's Handbook*, *Volume I*. Specific design standards, basin specific criteria and procedures can be found in the *State of Florida Environmental Resource Permit Applicant's Handbook*, *Volume II*. Typical protocol for a project includes a SFWMD representative reviewing and approving the delineation of the landward extent of wetlands and surface waters subsequent to the submittal of a permit application for construction.

FDEP 404 Program

In December 2020, the U.S. Environmental Protection Agency (EPA) delegated responsibility to the FDEP to administer dredge and fill applications within "Assumed Waters" within the State of Florida that are regulated under Section 404 of the Clean Water Act (CWA). Assumed Waters generally include non-navigable freshwaters and wetlands that fall beyond 300 feet from a "Retained Water". Dredge and fill applications that include Retained Waters will continue to be processed by the ACOE. The State 404 Program rule was created to include federal requirements that were not addressed by the Florida ERP program. The State 404 Program is a separate program from the existing ERP program and projects within Assumed Waters will require both an ERP and State 404 authorizations.

During the field investigation, areas meeting the jurisdictional definition of "Assumed Waters" ("Waters of the United States" and "Adjacent Waters") pursuant to Section 404 of the Clean Water Act were observed within the subject property boundaries.

The FDEP 404 will require mitigation to compensate for impacts to the wetlands under their jurisdiction. Federal policy prefers the purchase of mitigation bank credits as compensatory mitigation rather than the applicant providing mitigation on- or off-site.

Wetland Mitigation

In most circumstances, SFWMD and FDEP 404 will require mitigation to compensate for direct and secondary impacts to the water resources (wetlands and surface waters). As part of the permitting process, avoidance and minimization criteria must be addressed. Before mitigation to compensate for wetland impacts is accepted, an applicant must clearly show that all alternatives to avoid and minimize impacts to wetlands are exhausted. If it is determined that impacts to wetlands are unavoidable, then proposed mitigation options will be evaluated by the regulatory agencies.

The subject property is within the East Everglades Drainage Basin and the Mitigation Service Area (MSA) of the Hole-in-the-Donut (HID) Mitigation Bank. HID is the only mitigation bank that may currently have the appropriate type of credits available. The current cost of mitigation at the HID Mitigation Bank is $78,000 per 1 UMAM credit. Credits are released to customers only through a lottery system. Reservations cannot be

made without a permit or permit application number. Below are policies published by the HID Mitigation Bank regarding the credit release process.

- Applications received must be for single projects.
- A waiting list for credits is not maintained by the project.
- We don't notify or otherwise advertise the availability of credits.
- The HID project reserves the right to schedule a credit release lottery at its convenience and at a date and time of their choosing.
- Applications for new credit reservations will only be processed during the credit release lottery. Applications received before or after the date and time specified for the credit release lottery will not be processed.
- Applications to reserve mitigation credits must show mitigation requirements in UMAM.
- Applications to reserve mitigation credits at the HID are processed via a credit release lottery.
- Each credit release lottery conducted by the HID is equally open to all permittees who need wetland mitigation credits. The credit release lottery process is random, free of bias or preference, and with no exclusion, stratification, prioritization or ranking of projects based on the number of credits a project requires, based on whether a project has previously satisfied a portion of its credit requirements, or based on who is submitting the applications.
- Requests to increase the number of credits on a current reservation letter require a new credit application form, reflecting the additional credits needed, to be submitted and processed with all other applications during the next credit release lottery.
- Reservation letters are valid for a 6-month period. Reservations can be extended once for an additional 6-month period.
- Reservations not paid within 12 months of the original reservation date (provided there has been an approved reservation extension) will be released back to the HID mitigation project.
- Reservations made without a valid permit or permit application number will be released back to the HID mitigation project.
- The HID does NOT alert customers when their reservation is nearing expiration.
- Expired reservations will not be reinstated or otherwise renewed. The credits associated with an expired reservation are immediately returned to the HID project.
- There are no refunds on paid reservations.
- Reserved or purchased credits are non-transferrable.
- Requests for administrative reservation letter modifications (permit numbers, addresses, reducing the number of credits) will be processed as they are received in writing via email to ever_hid_credit_application@nps.gov.
- Credits on expired reservations are retained by/released back to the HID mitigation project.

According to a representative of the HID Mitigation Bank, applications for credits must be submitted within two days prior to the credit release lottery. The only notification of credit release lottery is through a press release and on the HID Mitigation Bank website (**https://www.nps.gov/ever/getinvolved/hole-in-the-donut-mitigation-bank.htm**). The most recent credit release lottery was held in April 2022. The HID bank released 100 credits in that lottery but had applications for over 400 credits. The bank representative stated that the next lottery is expected to occur in Spring 2023.

Summary and Conclusion

CPH conducted a preliminary wetland jurisdiction assessment on a 2.68-acre property located on the south side of SW 328th Street (aka SE 8th Street) immediately northwest of Florida's Turnpike (SR 821). A CPH environmental scientist conducted the field investigation on October 6, 2022.

The subject property is a vacant field which was in agricultural use for decades until 2019. The shrubby and herbaceous vegetation observed on the subject property is predominantly hydrophytic. The *Soil Survey of Dade County Area, Florida*, identifies three (3) soil types within the subject property boundaries. The two soil types that cover a majority of the property are listed as hydric by The *Hydric Soils of Florida Handbook*, *Fourth Edition* (Hurt 2007). Based on observations of the vegetation and soils on the subject property during the October 6, 2022 field investigation. CPH has made a preliminary determination that approximately 2.32 acres of the subject property are jurisdictional wetland that fall under the jurisdiction of the South Florida Water Management District and the Florida Department of Environmental Protection 404 Program. (**Figure 3, attached**). Based on the vegetative composition of the wetland, observed evidence of hydrology and a cursory review of the surrounding landscape, it appears the on-site wetland is lower-functioning, or of lower quality.

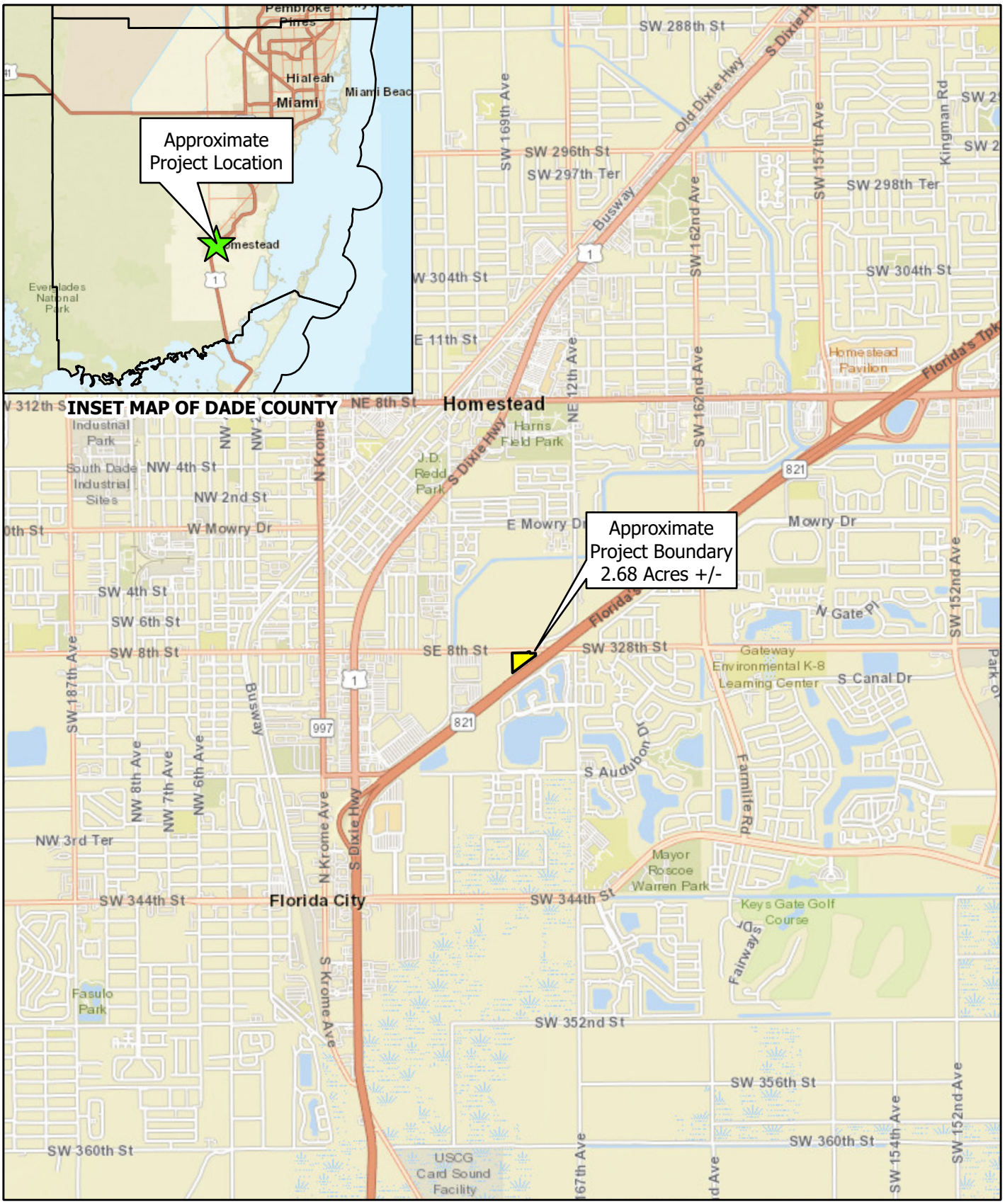
As part of the permitting process, avoidance and minimization criteria must be addressed. Before mitigation to compensate for wetland impacts is accepted, an applicant must clearly show that all alternatives to avoid and minimize impacts to wetlands are exhausted. If it is determined that impacts to wetlands are unavoidable, then proposed mitigation options will be evaluated by the regulatory agencies. The Hole-in-the-Donut (HID) Mitigation Bank is currently the only mitigation bank that may have the appropriate type of wetland credits available. The current cost of mitigation at the HID Mitigation Bank is $78,000 per 1 UMAM credit.

If an applicant intends to obtain permits for development of the subject property, CPH recommends that a prospective applicant budget $63,000 in mitigation costs for each acre of wetland impact that would be authorized by permitting agencies. However, at the present time, the availability and cost of wetland mitigation credits is uncertain.

Nothing in this report regarding environmental laws, rules and regulations is intended to be a legal interpretation or opinion, thus readers of this report should contact an attorney concerning any matters of law.

If you have any questions, please contact me at 941-587-7436 or via email at dlanders@cphcorp.com.

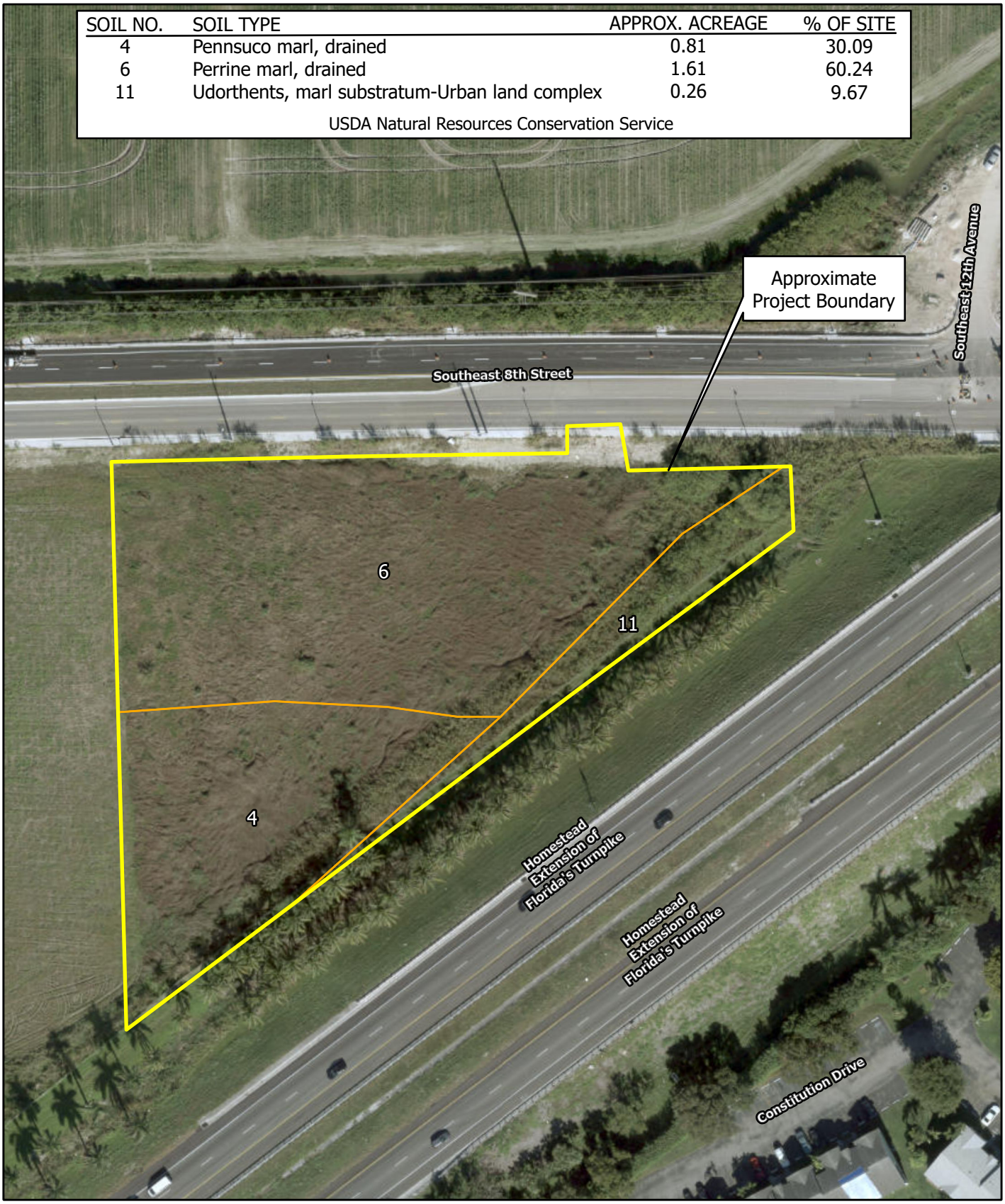
Attachments:
Figure 1 Location Map
Figure 2 Soils Map
Figure 3 Preliminary Wetland and Surface Water Location Map



cph	Scale: 1 in = 1 mi Date: 10/28/2022 Photo Date: N/A Project No. F17801 Biologist: AED GIS: AV	N	LOCATION MAP HOMESTEAD SELF STORAGE SECTION 18 & 19 , TOWNSHIP 57 SOUTH, RANGE 39 EAST DADE COUNTY, FLORIDA	FIGURE 1

SOIL NO.	SOIL TYPE	APPROX. ACREAGE	% OF SITE
4	Pennsuco marl, drained	0.81	30.09
6	Perrine marl, drained	1.61	60.24
11	Udorthents, marl substratum-Urban land complex	0.26	9.67

USDA Natural Resources Conservation Service



Scale:	1 in = 100 ft
Date:	10/28/2022
Photo Date:	2021
Project No.	F17801
Biologist: AED	GIS: ACV

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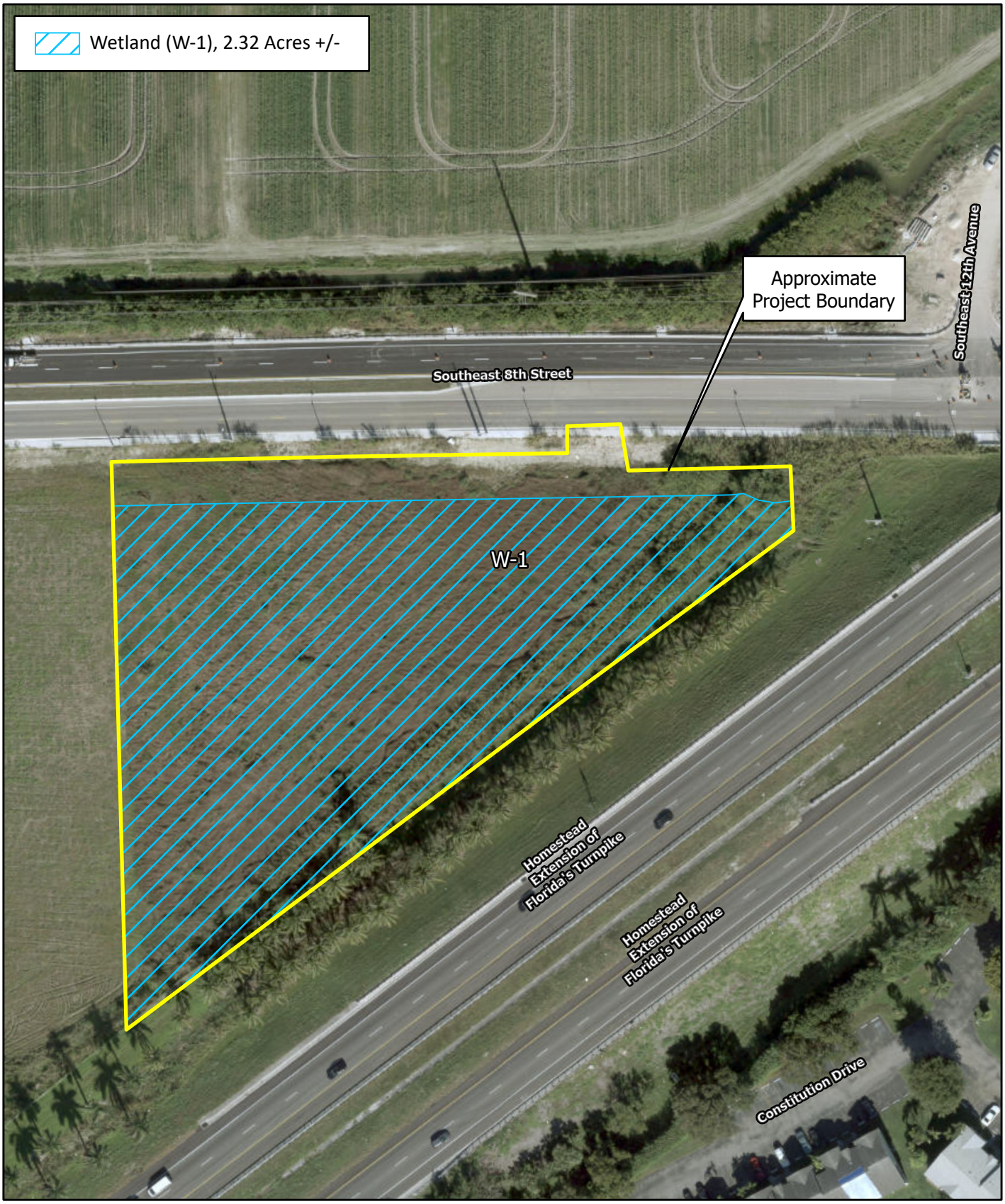
SOILS MAP

HOMESTEAD SELF STORAGE
SECTION 18 & 19 , TOWNSHIP 57 SOUTH, RANGE 39 EAST
DADE COUNTY, FLORIDA

FIGURE 2



cph	Scale: 1 in = 100 ft Date: 10/28/2022 Photo Date: 2021 Project No. F17801 Biologist: AED GIS: ACV	N	WETLAND LOCATION MAP HOMESTEAD SELF STORAGE SECTION 18 & 19 , TOWNSHIP 57 SOUTH, RANGE 39 EAST DADE COUNTY, FLORIDA

FIGURE 3