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Bio-Tech Consulting

An EnviroTrac Company

EnviroTrac

May 26, 2026

Proj: Challenger Parkway Lot 1 – Orange County, Florida

Parcel ID: 15-22-31-1218-32-010

(BTC File #1535-167)

Re: Wetlands Report

On May 20, 2026, Bio-Tech Consulting, Inc. (BTC) conducted a wetland delineation of the approximately 32.14-acre Challenger Parkway Lot 1, located on the east side of Chalenger Parkway, ¼ mile north of East Colonial Drive, Orange County, Florida.

Wetlands

All wetlands and surface waters on the site have been delineated by BTC in accordance with local, state and federal guidelines utilizing pink “Bio-Tech Consulting” flagging tape (**Figures 1 & 2**). All wetland/surface water flag locations will need to be approved by the appropriate regulatory agencies during the permitting process.

The following information describes the expected permitting agencies having jurisdiction over the subject site wetlands.

Orange County Environmental Protection Division

Wetland Determination (WD)

A Wetland Determination (WD) will be required from the Orange County Environmental Protection Division (OCEPD) to determine the extent of any wetlands and surface waters that exist within the subject site, or the absence of wetlands and surface waters within the subject site. During this process, a signed and sealed boundary survey describing the metes and bounds of all the on-site wetlands and surface waters tied to the boundary will be required. This permit will be valid for five (5) years, unless extended under a permit modification.

Natural Resource Impact Permit (NRIP)

All wetland and/or surface water impacts will require either a Noticed General Permit (NGP) or Standard Permit (SP) from OCEPD. Due to the various impact thresholds for meeting either a NGP or SP permit, the type of NRIP cannot be determined until a site plan has been created. All wetlands and/or surface waters now require a 100-ft upland buffer; including ditches and man-made ponds. Additionally, a permit will be required for development within the 100-foot upland buffer surrounding any wetland or surface water, even if no wetland impacts are proposed.

Under the Standard Permit (SP) process, there are three (3) levels of permit review criteria based on the total wetland and surface water impact acreage and habitat criteria of the wetland impacts. Some review criteria that may be required include a Cumulative Impact Analysis, Secondary Impact Analysis and/or an Alternate Site Analysis to demonstrate that the proposed site plan and project site location are the least environmentally damaging project design. Level 3 Standard Permits will require Board of County Commission approval, while other permit applications may be approved by staff.

Based on historical permitting documents, wetlands on the site were preserved as mitigation for the overall Research Park Orange County mitigation plan. If wetland impacts are proposed, additional mitigation will be required to replace the mitigation value that the site currently provides in addition to any new impacts. The OCEPD will require a permit modification for the project that utilizes this area as mitigation. Mitigation bank credits will need to be purchased from an approved mitigation bank.

St. Johns River Water Management District (SJRWMD)

An Environmental Resource Permit (ERP) will be required through the St. Johns River Water Management District (SJRWMD) to authorize construction and operation of a stormwater management system for the site in association with a proposed project. This includes new activities in uplands that generate stormwater runoff from upland construction, as well as dredging and filling in wetlands and other surface waters. Impacts to the site's wetland and other surface water communities would be permissible by SJRWMD as long as the issues of elimination and reduction of wetland impacts have been addressed and as long as the mitigation offered is sufficient to offset the functional losses incurred via the proposed impacts. Coordination with the Division of Historical Resources (DHR) and the FFWCC will be necessary as part of the ERP process.

Based on historical permitting documents, the subject property was utilized as mitigation for the overall Research Parkway and is encumbered with a conservation easement dedicated to the SJRWMD. In order to authorize construction and operation of a stormwater management system for the site in association with a proposed project, the existing conservation easement will require a "Request for Conservation Easement Release" with the SJRWMD. The SJRWMD will require a permit modification for the project that utilizes this area as mitigation. Mitigation bank credits will need to be purchased from an approved mitigation bank.

U.S. Army Corps of Engineers (USACE)

On February 15, 2024, the U.S. District Court in Washington DC issued a "Memorandum Opinion" regarding the case of Center for Biological Diversity v. United States Environmental Protection Agency (EPA), State of Florida, et al. This ruling immediately returned the Federal Review of Section 404 of the Clean Water Act back to the USACE completely within the State of Florida and vacating the Florida State 404 program.

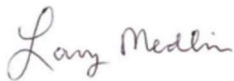
Section 404 of the Clean Water Act (CWA) requires that federal authorization be obtained for all activities that propose the placement of dredged or fill material in "Waters of the United States" (WOTUS). The regulatory program established by CWA Section 404 is jointly implemented by the US Environmental Protection Agency (USEPA) and the USACE. Criteria for permit review and issuance are described in CWA Section 404(b)(1) Guidelines. Included in those guidelines, but not limited to, is the requirement to (a) justify jurisdictional wetland impacts with an alternative sites analysis that demonstrates the subject site is the most viable site in the vicinity for the project and will result in the least damaging environmental impacts compared to alternative site locations, and (b) demonstrate on-site avoidance and minimization of impacts have been limited to the maximum practicable extent while allowing for the project purpose. The USACE rarely accepts on-site preservation as mitigation for wetland impacts. All USACE impacts will be required to be

off-set by purchase of credits from an approved federal mitigation bank. The USACE will coordinate with the Division of Historical Resources (DHR) regarding potential impacts to archaeological and cultural resources, as well as the USFWS regarding impacts to species listed under the Endangered Species Act. The permitting process with the USACE is a much longer process than the State ERP program with potential permitting timeframes of 12-18 months depending on the complexity of the wetland impacts and mitigation. The USACE permit cannot be issued without a copy of the State ERP.

In regards to this parcel, the on-site wetlands appear to be USACE jurisdictional due to the hydrologic connection to the Econlockhatchee River.

The environmental limitations described in this document are based on observations and technical information available on the date of the on-site evaluation. This report is for general planning purposes only. The limits of any on-site wetlands/surface waters can only be determined and verified through field delineation and/or on-site review by the pertinent regulatory agencies. Should you have any questions or require any additional information, please do not hesitate to contact our office at (407) 894-5969. Thank you.

Regards,



Larry Medlin
Environmental Lead



John Miklos
President

