



**THE VILLAGE AT LAUREL AND JACARANDA**

**ENVIRONMENTAL NARRATIVE**

June 2022

Prepared for:

***NEAL COMMUNITIES***  
***5800 LAKEWOOD RANCH BLVD***  
***SARASOTA, FL 34240***

Prepared by:

***KIMLEY-HORN***  
**2619 CENTENNIAL BOULEVARD, SUITE 200**  
**TALLAHASSEE, FL 32308**

## **INTRODUCTION**

The proposed project is a commercial project known as The Village at Laurel and Jacaranda. The project is located in Venice at the intersection of Laurel Road and Jacaranda in Section 35, Township 38 South, Range 19 East, in Sarasota County. See attached Location Map.

## **METHODOLOGY**

The following methods were employed to assess the referenced parcel:

- Field inspection of the site for identification of habitats, protected species, or other sensitive environmental features.
- Listed species evaluations of the site were conducted in accordance with appropriate State or Federal agency requirements. Gopher Tortoise Surveys were conducted under the supervision of an Authorized Gopher Tortoise Agent. Methodology utilized to evaluate the site for gopher tortoise was consistent with FFWCC Gopher Tortoise Permitting Guidelines Appendix 4.
- Recent and historical aerial photograph interpretation of the subject property.
- Research of Sarasota County, and various State and Federal databases regarding protected wildlife species.

The jurisdictional limits of onsite wetlands and surface waters were established through the issuance of a Petition for Formal Determination of Wetlands and Surface Waters (41590.000). This permit expired on February 20, 2019, but subsequent permits issued for Aria, Cielo, and Jacaranda have utilized the previously approved wetland and surface water boundaries. Please see the attached FLUCCS Habitat Map for the approximate wetland and surface water locations within the subject parcel.

## **EXISTING CONDITIONS**

The existing conditions of the project including upland and wetland plant communities were mapped in accordance with Florida Land Use Cover Forms and Classification System (FLUCCS, Florida Department of Transportation 1999). Please see the attached FLUCCS Habitat Map for the location of habitats described below.

### **Upland Descriptions**

#### **Open Land (FLUCCS 190)**

Upland portions of the site have been disturbed during previous agricultural and construction activities and do not contain native habitat. The open land mostly contains a mix of ruderal plant species and Brazilian pepper (*Schinus terebinthifolius*), but some slash pine (*Pinus elliottii*), laurel oak (*Quercus laurifolia*), live oak (*Quercus virginiana*), and saw palmetto (*Serenoa repens*) are present adjacent to the on-site wetland.

### **Wetland and Other Surface Water Habitats**

#### **Reservoirs less than 10 acres (FLUCCS 534)**

There is one permitted stormwater pond located on the eastern portion of the subject parcel. This pond was excavated in uplands and was authorized by Environmental Resource Permits issued for previous development activities on the subject parcel. As this feature is a permitted stormwater pond, it will not be regulated as a jurisdictional surface water.

### **Freshwater Marsh (FLUCCS 641)**

Wetland habitats observed onsite include a freshwater marsh. The freshwater marsh, which is approximately 6.6 acres, exists on a significant portion of the project area. This marsh contains a mix of native and non-native wetland plants including sand cordgrass (*Spartina bakeri*), maidencane (*Panicum hemitomon*), torpedo grass (*Panicum repens*), arrowhead (*Sagittaria lancifolia*), pickerelweed (*Pontederia cordata*), spikerush (*Eleocharis* spp.), primrose willow (*Ludwigia peruviana*), floating heart (*Nymphoides* sp.), and other grasses and sedges. Much of the northern portion of this wetland was historically filled during the construction of the Venetian Golf and River Club and the construction of Laurel Road. In addition, a stock pond was excavated in the wetland during previous agricultural activities and the wetland was bisected by the FPL patrol road to the south. These disturbances have affected the hydrology of the wetland as well as the species composition and allowed invasive plants to become established.

### **SOILS**

According to the current Natural Resources Conservation Service (NRCS) web soil survey <http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx> for Sarasota County, there are three (3) soil types found within the project boundary. Please see the attached NRCS Soils Map. Soils found on site are listed below:

- 8 – Delray fine sand
- 22 – Holopaw fine sand, frequently ponded, 0-1% slopes
- 31 – Pineda – Pineda, wet, fine sand, 0-2% slopes

### **LISTED SPECIES**

Ardurra has reviewed the subject property for the potential presence of listed species. This review included multiple field surveys and research of available databases for documented listed species presence relative to the proposed project.

To assist in determining potential utilization of the subject parcel by listed species, a search of available databases was conducted including review of Florida Native Areas Inventory (FNAI) and Florida Fish and Wildlife Conservation Commission (FWC) bald eagle nest locator databases.

In addition to the database searches, Senior Scientists have performed numerous field surveys of the project beginning in 2014. No protected species were observed nesting or denning within the onsite habitats. Methodology utilized to evaluate the site for gopher tortoise was consistent with FFWCC Gopher Tortoise Permitting Guidelines Appendix 4.

Given the habitats present and the results of the recent listed species review, significant utilization by listed species is not anticipated, but if listed species are found during construction, appropriate measures will be taken with State and Federal regulatory agencies.

### **FNAI Biodiversity Matrix**

In addition to the previous listed species evaluations conducted on the site, the FNAI Biodiversity Matrix was consulted to determine documented, likely, and/or potentially



occurring rare animals in the vicinity of the project area. The only “documented” species to occur in the vicinity of the project is the Bald Eagle (*Haliaeetus leucocephalus*), and the most “likely” species to occur in the vicinity of the project as listed by FNAI (Matrix Units 27083 attached) is the Wood Stork (*Mycteria americana*), and the Eastern Indigo Snake (*Drymarchon couperi*).

The table below lists the species that have the potential to utilize the project area.

Common Name	Scientific Name	Federal/State Status	Likelihood of Occurrence	Results of Updated Survey
<b>Bald Eagle</b>	<i>Haliaeetus leucocephalus</i>	Migratory Bird/X	Not Observed.	Documented nesting location located adjacent to the project area.
<b>Wood Stork</b>	<i>Mycteria americana</i>	E/T	Likely (FNAI)	Not observed.
<b>Gopher Tortoise</b>	<i>Gopherus polyphemus</i>	X/T	Potential (FNAI)	No active burrows identified.
<b>Eastern Indigo Snake</b>	<i>Drymarchon couperi</i>	T/T	Likely (FNAI)	Not observed.
<b>Sandhill Crane</b>	<i>Grus canadensis pratensis</i>	X/T	Potential (FNAI)	Not observed.
<b>Florida Burrowing Owl</b>	<i>Athene cunicularia floridana</i>	X/SSC	Potential (FNAI)	Little to no habitat exists on site.
<b>Gopher Frog</b>	<i>Lithobates capito</i>	X/T	Potential (FNAI)	No gopher tortoise burrows identified.

**Bald Eagle (*Haliaeetus leucocephalus*)**

A search of the Florida Fish and Wildlife Conservation Commission (FWC) bald eagle database was completed to determine whether any known bald eagle nests occur within the vicinity of the subject parcel. The database and field observations revealed that nest SA023 is located approximately 550’ south of the project area. Observation of the nest site during the 2021-2022 nesting season revealed no nesting activity in this location. Should the eagles return to the nest site during the construction of the proposed project, the appropriate U.S. Fish & Wildlife Service (USFWS) consultation will occur, and permits acquired, if necessary.

**Wood Stork (*Mycteria americana*) and Wading Birds**

The wood stork is listed as “Endangered” by the USFWS. According to USFWS data, the project does fall within the Core Foraging Areas (CFA) for the Blackburn Bay nesting colony (Atlas No. 615035). The Blackburn Bay nesting colony is located approximately 5.7 miles west of the project boundary. There is no evidence of breeding or significant foraging by wood storks occurring within the project area.

**Gopher Tortoise (*Gopherus polyphemus*)**

Senior Scientists have conducted preliminary gopher tortoise surveys within the project area. During these surveys no evidence of Gopher Tortoise or burrows were observed on-site. Ninety (90) days prior to construction and land clearing within the project area, a 100 percent survey of suitable habitat will be conducted. Should any gopher tortoise burrows be in or within 25' of the limits of clearing, a relocation permit from FWC will be obtained to remove all gopher tortoises within the project area.

**Eastern Indigo Snake (*Drymarchon corais couperi*)**

The eastern indigo snake is listed as "Threatened" by both the FWS and FWC. The snake occurs in a range of habitats, including pine flatwoods, scrubby flatwoods, dry prairie, edges of freshwater marshes, agricultural fields, and human-altered habitats. According to FNAI data, potential habitat for the eastern indigo snake may be present within the project area. During the field reviews and wetland evaluations, no eastern indigo snakes were observed within or adjacent to the project area. The project will likely implement the U.S. Fish and Wildlife Service's (USFWS) 'Standard Protection Measures for the Eastern Indigo Snake' (revised August 12, 2013) in order to prevent any adverse impacts to this species.

**Sand Hill Crane (*Antigone canadensis paratensis*)**

There were no Sandhill Crane, a 'Threatened' species, nesting areas observed during wildlife surveys conducted on the property. The distribution of this species can be found throughout Florida in open pasture, ditches, and certain wetland type habitats. During visits to the subject parcel, the edges of all wetland areas within the site were specifically evaluated for the presence of Sandhill cranes. None were observed. Surveys for nesting sandhill cranes will be conducted prior to construction activities, with nesting typically occurring during the December through August breeding season. If there is evidence of nesting by sandhill cranes during this period, FWC recommendations as specified in the Sandhill Crane Species Crane-Species-Guidelines-2016.pdf) and in the Florida Wildlife Conservation Guide (<http://myfwc.com/conservation/value/fwccg/>) will be followed.

**Florida Burrowing Owl (*Athene cunicularia floridana*)**

Florida Burrowing Owls are usually located within open prairie type landscapes with little to no understory vegetation. Based on the habitats present, it is unlikely the uplands on the subject property are utilized by Burrowing Owls. 100% of the areas identified as open lands were evaluated on numerous visits to the site by Senior Scientist, and no evidence of Florida Burrowing Owls or their burrows have been identified on the project site.

**Gopher Frog (*Lithobates capito*)**

The Gopher Frog is typically found within longleaf pine, xeric oak, and sandhills mostly, but also occurs in upland pine forest, scrub, xeric hammock, mesic and scrubby flatwoods, dry prairie, mixed hardwood-pine communities, and a variety of disturbed habitats. The Gopher Frog inhabits Gopher Tortoise burrows. It is

very unlikely that this species exists on this site due to the lack of Gopher Tortoise burrows located within the project boundaries.

## **PROPOSED CONDITIONS**

### **Wetlands and Surface Waters**

#### **Impacts**

Based on the proposed commercial use of this parcel, there are limited alternatives available that allow an economically viable project on the subject parcel without impacting most, if not all, of the on-site wetland. As a result, the applicant proposes to fill approximately 6.6 acres of the on-site wetland and provide mitigation utilizing marsh credits from the Myakka Mitigation Bank. Earth Balance, who manages the mitigation bank, and staff from SWFWMD during a pre-application meeting have both confirmed that credits from the Myakka Mitigation Bank can be used for a project on the subject parcel.

In addition to economic viability, the long-term functional viability of the project wetland was evaluated prior to proposing the impacts described above. Given the location of the wetland, which is adjacent to a major intersection, and the historical activities that have impacted the hydrology and allowed for the establishment of invasive species, it is anticipated that the functions of the wetland will continue to degrade in the future. The functions currently provided by this wetland on a regional level will be maintained in perpetuity through the long-term preservation and management of the Myakka Mitigation Bank.

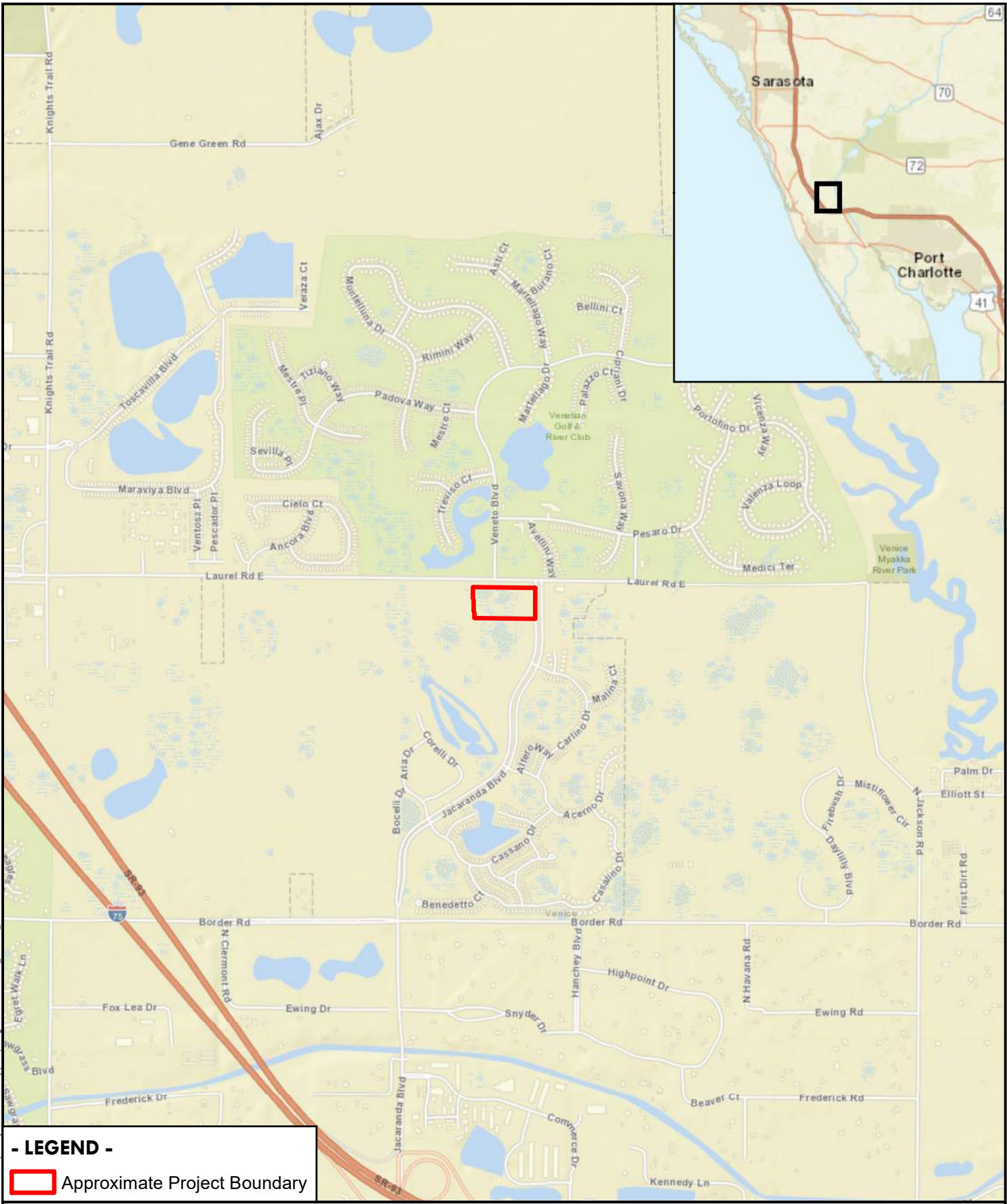
The on-site stormwater pond will be filled during the construction of the proposed project. As this is a permitted stormwater pond, it is not regulated as a jurisdictional surface water, and should not be considered an impact.

#### **Mitigation**

The attached Uniform Mitigation Assessment Method (UMAM) analysis was conducted to determine the mitigation required for impacts to the 6.6-acre project wetland. Based on the results of the UMAM four (4) credits will be required.

#### **Wetland Buffers**

Not applicable since the on-site wetland will be filled.

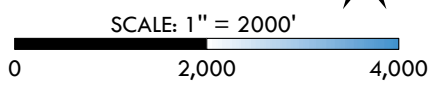


**- LEGEND -**  
 Approximate Project Boundary

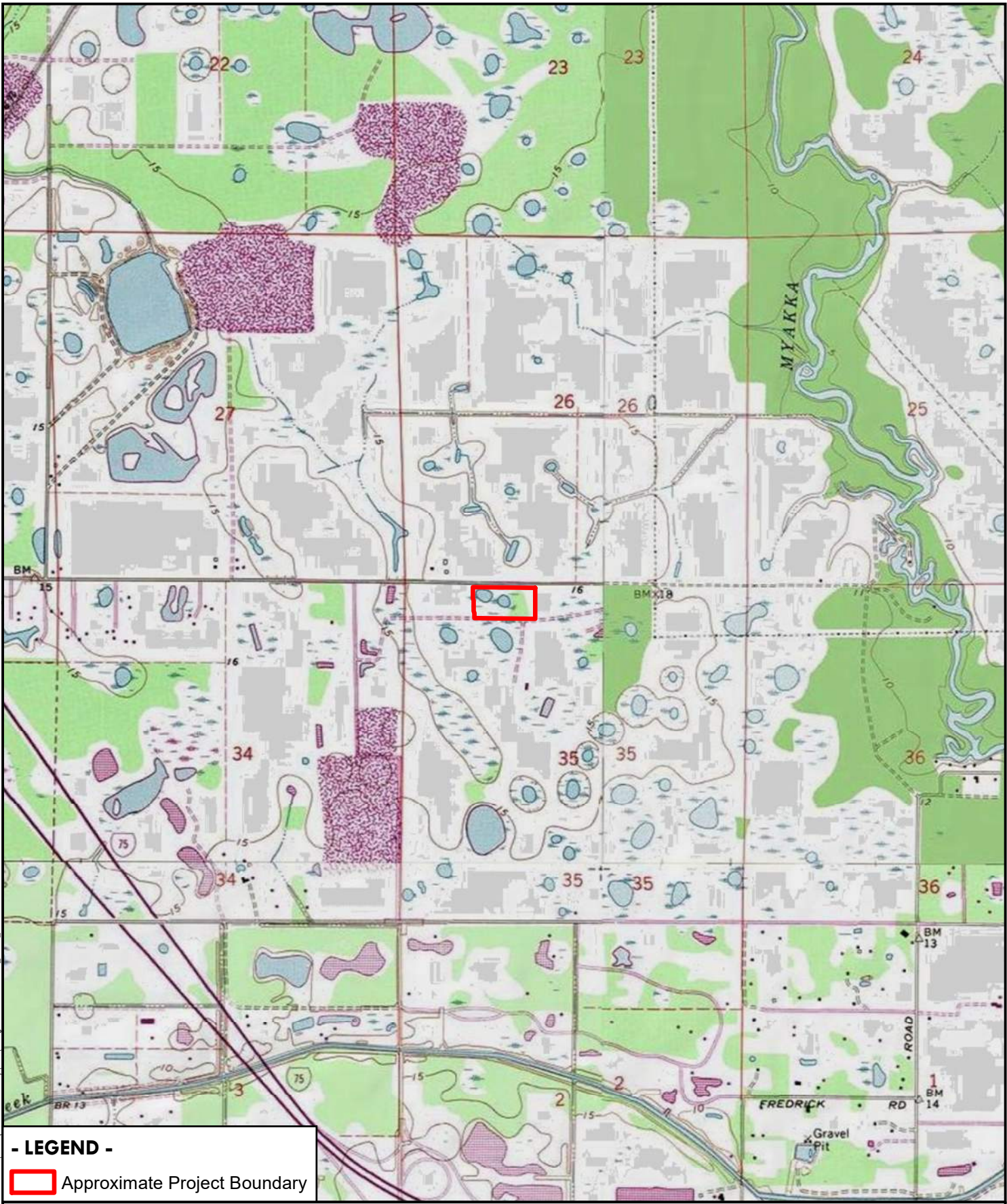


**Client:** Neal Communities  
**Project:** The Village at Laurel & Jacaranda  
**Location:** Sarasota County, Florida  
**TRS:** Sec: 35 Twp: 38S Rng: 19E  
**Title:** Location Map  
**Source:** ESRI World Street Map

**Drawn By:** KS  
**Date:** 6/7/2022  
**Sheet:** 1



D:\1\_Sarasota\Neal Communities of Southwest Florida\Clelio (aka Milano NW)\GIS\ Villages\Laurel\Jacaranda\_Location\_060722.mxd



**- LEGEND -**

 Approximate Project Boundary

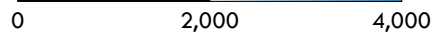


**Client:** Neal Communities  
**Project:** The Village at Laurel & Jacaranda  
**Location:** Sarasota County, Florida  
**TRS:** Sec: 35 Twp: 38S Rng: 19E  
**Title:** USGS Quad Map  
**Source:** USGS Topo Maps

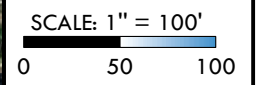
**Drawn By:** KS  
**Date:** 6/7/2022  
**Sheet:** 1



SCALE: 1" = 2000'







Drawn By: KS  
 Date: 6/7/2022  
 Sheet: 1



Client: Neal Communities  
 Project: The Village at Laurel & Jacaranda  
 Location: Sarasota County, Florida  
 TRS: Sec: 35 Twp: 38S Rng: 19E  
 Title: NRCS Soils Map  
 Source: Sarasota County Imagery (2021), NRCS

**- LEGEND -**

Approximate Project Boundary

**Soil Descriptions**

8: Delray fine sand, depressional

22: Holopaw fine sand, frequently ponded, 0 to 1 percent slopes

31: Pineda-Pineda, wet, fine sand, 0 to 2 percent slopes

Soil Code	Descriptions	± Acreage
8	Delray fine sand, depressional	2.33
22	Holopaw fine sand, frequently ponded, 0 to 1 percent slopes	3.88
31	Pineda-Pineda, wet, fine sand, 0 to 2 percent slopes	4.20
<b>Total Project Acreage</b>		<b>10.42</b>



GRAPHIC REPRESENTATIONS ARE GENERAL IN NATURE AND SHOULD BE USED FOR PLANNING PURPOSES ONLY



SCALE: 1" = 100'  
0 50 100

Drawn By: KS  
Date: 6/7/2022  
Sheet: 1



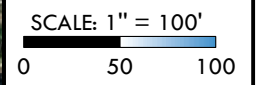
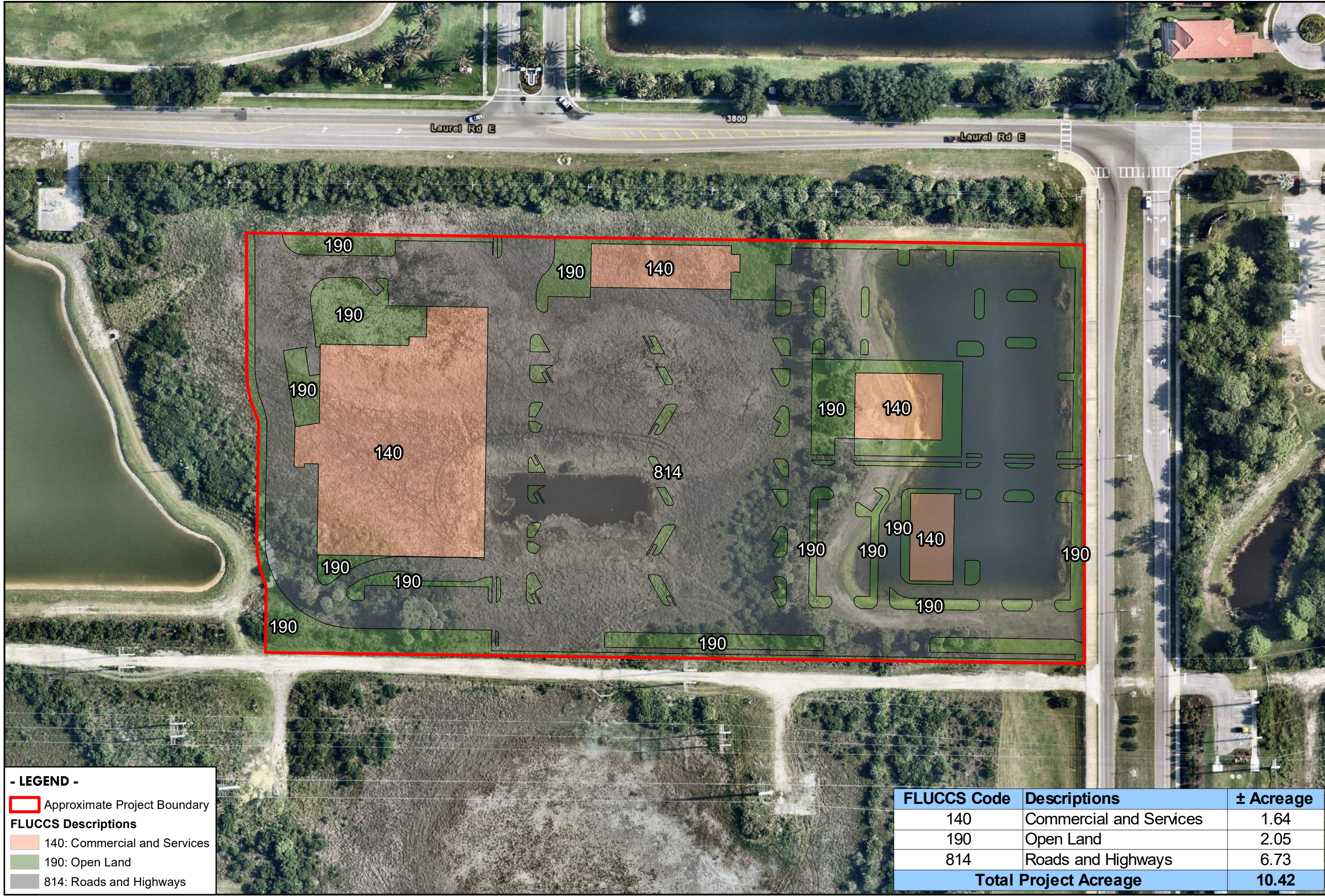
Client: Neal Communities  
Project: The Village at Laurel & Jacaranda  
Location: Sarasota County, Florida  
TRS: Sec: 35 Twp: 38S Rng: 19E  
Title: FLUCCS Habitat Map  
Source: Sarasota County Imagery (2021)

**- LEGEND -**  
 Approximate Project Boundary  
 Approximate FLUCCS Habitat Lines

FLUCCS Code	Descriptions	± Acreage
190	Open Land	1.58
534	Reservoirs less than 10 Acres	2.24
641	Freshwater Marshes	6.60
<b>Total Project Acreage</b>		<b>10.42</b>



GRAPHIC REPRESENTATIONS ARE GENERAL IN NATURE AND SHOULD BE USED FOR PLANNING PURPOSES ONLY



Drawn By: KS  
 Date: 6/7/2022  
 Sheet: 1



**Client:** Neal Communities  
**Project:** The Village at Laurel & Jacaranda  
**Location:** Sarasota County, Florida  
**TRS:** Sec: 35 Twp: 38S Rng: 19E  
**Title:** Post FLUCCS Habitat Map  
**Source:** Sarasota County Imagery (2021)

**- LEGEND -**

Approximate Project Boundary

**FLUCCS Descriptions**

140: Commercial and Services

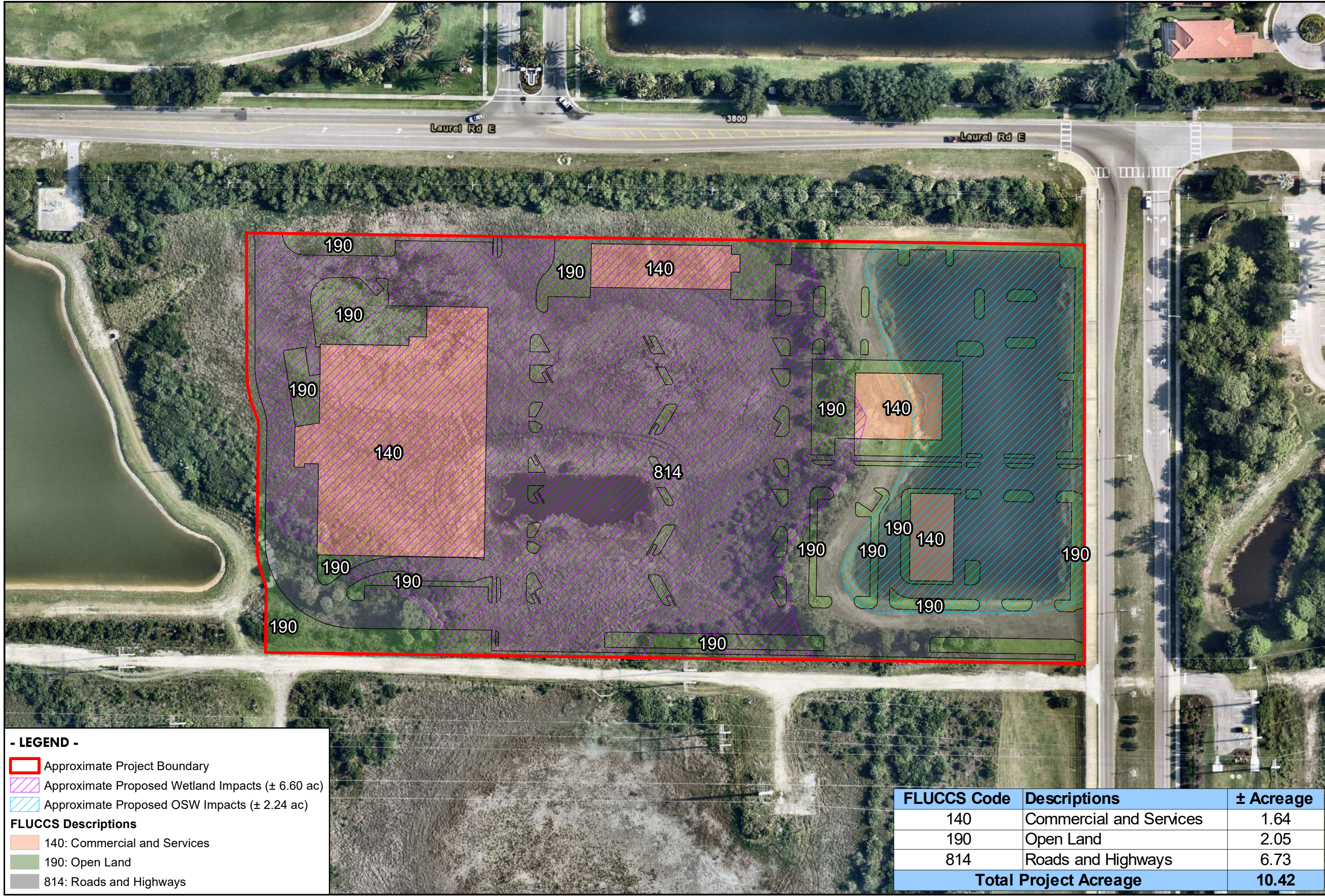
190: Open Land

814: Roads and Highways

FLUCCS Code	Descriptions	± Acreage
140	Commercial and Services	1.64
190	Open Land	2.05
814	Roads and Highways	6.73
<b>Total Project Acreage</b>		<b>10.42</b>



GRAPHIC REPRESENTATIONS ARE GENERAL IN NATURE AND SHOULD BE USED FOR PLANNING PURPOSES ONLY



SCALE: 1" = 100'  
0 50 100

Drawn By: KS  
Date: 6/8/2022  
Sheet: 1



Client: Neal Communities  
Project: The Village at Laurel & Jacaranda  
Location: Sarasota County, Florida  
TRS: Sec: 35 Twp: 38S Rng: 19E  
Title: Post FLUCCS Habitat & Proposed Impact Map  
Source: Sarasota County Imagery (2021)

**- LEGEND -**

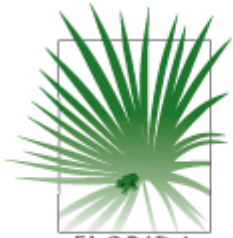
- Approximate Project Boundary
- Approximate Proposed Wetland Impacts (± 6.60 ac)
- Approximate Proposed OSW Impacts (± 2.24 ac)

**FLUCCS Descriptions**

- 140: Commercial and Services
- 190: Open Land
- 814: Roads and Highways

FLUCCS Code	Descriptions	± Acreage
140	Commercial and Services	1.64
190	Open Land	2.05
814	Roads and Highways	6.73
<b>Total Project Acreage</b>		<b>10.42</b>





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 www.fnai.org

FLORIDA  
**Natural Areas**  
 INVENTORY

# Florida Natural Areas Inventory

## Biodiversity Matrix Query Results

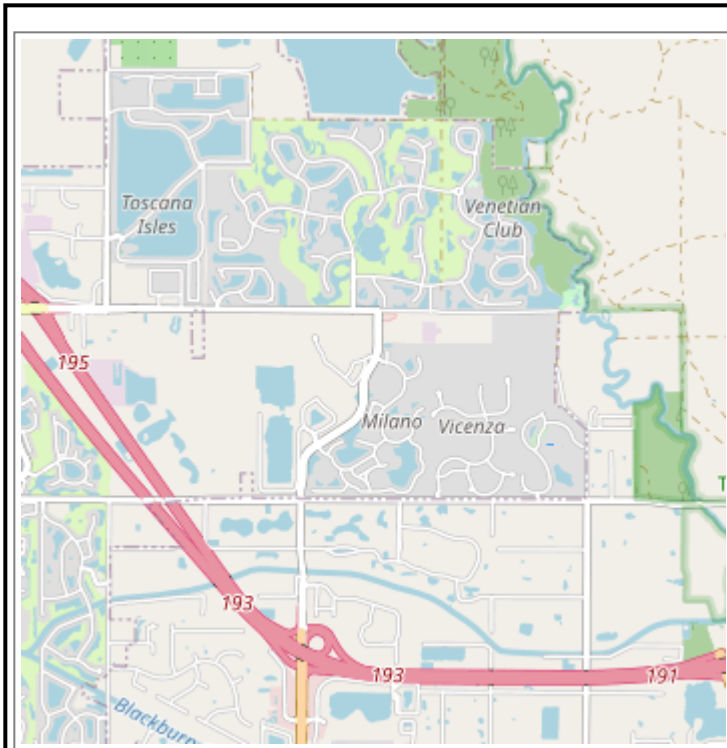
### UNOFFICIAL REPORT

Created 6/13/2022

(Contact the FNAI Data Services Coordinator at 850.224.8207 or  
 kbrinegar@fnai.fsu.edu for information on an official Standard Data Report)

NOTE: The Biodiversity Matrix includes only rare species and natural communities tracked by FNAI.

### Report for 1 Matrix Unit: 27083



#### Descriptions

**DOCUMENTED** - There is a documented occurrence in the FNAI database of the species or community within this Matrix Unit.

**DOCUMENTED-HISTORIC** - There is a documented occurrence in the FNAI database of the species or community within this Matrix Unit; however the occurrence has not been observed/reported within the last twenty years.

**LIKELY** - The species or community is *known* to occur in this vicinity, and is considered likely within this Matrix Unit because:

1. documented occurrence overlaps this and adjacent Matrix Units, but the documentation isn't precise enough to indicate which of those Units the species or community is actually located in; *or*
2. there is a documented occurrence in the vicinity and there is suitable habitat for that species or community within this Matrix Unit.

**POTENTIAL** - This Matrix Unit lies within the known or predicted range of the species or community based on expert knowledge and environmental variables such as climate, soils, topography, and landcover.

### Matrix Unit ID: 27083

#### 1 Documented Element Found

Scientific and Common Names	Global Rank	State Rank	Federal Status	State Listing
<a href="#">Haliaeetus leucocephalus</a> Bald Eagle	G5	S3	N	N

#### 0 Documented-Historic Elements Found

#### 3 Likely Elements Found

Scientific and Common Names	Global Rank	State Rank	Federal Status	State Listing
<a href="#">Drymarchon couperi</a> Eastern Indigo Snake	G3	S2?	T	FT
<i>Mesic flatwoods</i>	G4	S4	N	N
<a href="#">Mycteria americana</a>	G4	S2	T	FT

**Matrix Unit ID: 27083****17 Potential** Elements for Matrix Unit 27083

<b>Scientific and Common Names</b>	<b>Global Rank</b>	<b>State Rank</b>	<b>Federal Status</b>	<b>State Listing</b>
<i>Antigone canadensis pratensis</i> Florida Sandhill Crane	G5T2	S2	N	ST
<a href="#"><i>Athene cunicularia floridana</i></a> Florida Burrowing Owl	G4T3	S3	N	ST
<a href="#"><i>Calopogon multiflorus</i></a> many-flowered grass-pink	G2G3	S2S3	N	T
<a href="#"><i>Centrosema arenicola</i></a> sand butterfly pea	G2Q	S2	N	E
<i>Flatwoods/prairie lake</i>	G4	S3	N	N
<a href="#"><i>Gopherus polyphemus</i></a> Gopher Tortoise	G3	S3	C	ST
<a href="#"><i>Lechea cernua</i></a> nodding pinweed	G3	S3	N	T
<i>Lithobates capito</i> Gopher Frog	G2G3	S3	N	N
<i>Lythrum flagellare</i> lowland loosestrife	G3	S3	N	E
<a href="#"><i>Matelea floridana</i></a> Florida spiny-pod	G2	S2	N	E
<i>Mustela frenata peninsulæ</i> Florida Long-tailed Weasel	G5T3?	S3?	N	N
<a href="#"><i>Nemastylis floridana</i></a> celestial lily	G2	S2	N	E
<a href="#"><i>Nolina atopocarpa</i></a> Florida beargrass	G3	S3	N	T
<i>Phyllophaga elongata</i> Elongate June Beetle	G3	S3	N	N
<a href="#"><i>Rhynchospora megaplumosa</i></a> large-plumed beaksedge	G2	S2	N	E
<i>Sciurus niger niger</i> Southeastern Fox Squirrel	G5T5	S3	N	N
<a href="#"><i>Zephyranthes simpsonii</i></a> redmargin zephyrlily	G2G3	S2S3	N	T

**Disclaimer**

The data maintained by the Florida Natural Areas Inventory represent the single most comprehensive source of information available on the locations of rare species and other significant ecological resources statewide. However, the data are not always based on comprehensive or site-specific field surveys. Therefore, this information should not be regarded as a final statement on the biological resources of the site being considered, nor should it be substituted for on-site surveys. FNAI shall not be held liable for the accuracy and completeness of these data, or opinions or conclusions drawn from these data. FNAI is not inviting reliance on these data. Inventory data are designed for the purposes of conservation planning and scientific research and are not intended for use as the primary criteria for regulatory decisions.

**Unofficial Report**

These results are considered unofficial. FNAI offers a [Standard Data Request](#) option for those needing certifiable data.

**(See Section 62-345.400, F.A.C.)**

Site/Project Name The Village at Laurel and Jacaranda		Application Number		Assessment Area Name or Number Project Wetland	
FLUCCs code 641		Further classification (optional)		Impact or Mitigation Site? Impact	
				Assessment Area Size 6.6 Acres	
Basin/Watershed Name/Number Myakka River/Southern Coastal		Affected Waterbody (Class)		Special Classification (i.e.OFW, AP, other local/state/federal designation of importance)	
Geographic relationship to and hydrologic connection with wetlands, other surface water, uplands Pipes under the FPL patrol road connect the subject wetland to offsite wetlands to the south. It is also connected through control structures to the adjacent stormwater management system.					
Assessment area description The subject wetland is a remnant of a much larger wetland that was partially filled for the construction of the Venetian Golf and River Club and the construction Laurel Road. It functions as herbaceous marsh with mostly low growing wetland plant species.					
Significant nearby features None			Uniqueness (considering the relative rarity in relation to the regional landscape.) Not unique.		
Functions Wetland provides some habitat for wading birds and other wetland dependant species.			Mitigation for previous permit/other historic use Not applicable		
Anticipated Wildlife Utilization Based on Literature Review (List of species that are representative of the assessment area and reasonably expected to be found ) It is anticipated that the wetland is used for foraging by several species of wading birds. It also most likely provides habitat for small fishes, reptiles, and amphibians.			Anticipated Utilization by Listed Species (List species, their legal classification (E, T, SSC), type of use, and intensity of use of the assessment area) No significant utilization anticipated. See environmental narrative.		
Observed Evidence of Wildlife Utilization (List species directly observed, or other signs such as tracks, droppings, casings, nests, etc.): Wading birds have been observed foraging in the wetland.					
Additional relevant factors:					
Assessment conducted by: Alec Hoffner			Assessment date(s): 6/13/2022		

**PART II – Quantification of Assessment Area (impact or mitigation)**  
**(See Rules 62-345.500 and .600, F.A.C.)**

Site/Project Name <p align="center">The Village at Laurel and Jacaranda</p>	Application Number	Assessment Area Name or Number <p align="center">Project Wetland - 6.6 Acres</p>
Impact or Mitigation <p align="center">Impact</p>	Assessment conducted by: <p align="center">Alec D. Hoffner, Senior Scientist</p>	Assessment date: <p align="center">Jun-22</p>

Scoring Guidance  The scoring of each indicator is based on what would be suitable for the type of wetland or surface water assessed	<b>Optimal (10)</b>	<b>Moderate(7)</b>	<b>Minimal (4)</b>	<b>Not Present (0)</b>
	Condition is optimal and fully supports wetland/surface water functions	Condition is less than optimal, but sufficient to maintain most wetland/surface waterfunctions	Minimal level of support of wetland/surface water functions	Condition is insufficient to provide wetland/surface water functions

.500(6)(a) Location and Landscape Support  w/o pres or current 4	with 0	The project wetland is located at the intersection of Laurel and Jacaranda. It is bordered to the north by Laurel Road, to the south by an FPL patrol road, and to the east by a stormwater pond.
.500(6)(b)Water Environment (n/a for uplands)  w/o pres or current 7	with 0	
.500(6)(c)Community structure  1. Vegetation and/or Community 2. Benthic  w/o pres or current 7	with 0	
		This marsh contains a mix of native and non-native wetland plants including sand cordgrass ( <i>Spartina bakeri</i> ), maidencane ( <i>Panicum hemitomon</i> ), torpedo grass ( <i>Panicum repens</i> ), arrowhead ( <i>Sagittaria lancifolia</i> ), pickerelweed ( <i>Pontederia cordata</i> ), spikerush ( <i>Eleocharis</i> spp.), primrose willow ( <i>Ludwigia peruviana</i> ), floating heart ( <i>Nymphoides</i> sp.), and other grasses and sedges.

Score = sum of above scores/30 (if uplands, divide by 20)  current or w/o pres 0.6	with 0
--	-----------

If preservation as mitigation, Preservation adjustment factor = Adjusted mitigation delta =
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For impact assessment areas  FL = delta x acres = 0.6 x 6.6 = 3.96
--

Delta = [with-current]  -0.6
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If mitigation Time lag (t-factor) = Risk factor =
---

For mitigation assessment areas
---------------------------------