

April 30, 2026

Mr. Stephen Pettko
Holiday Builders, Inc.
2293 Eau Gallie Boulevard
Melbourne, Florida 32935

Re: Environmental Assessment
120 District Street SE, Palm Bay, FL
Tax Account No. 2927305
Atlantic Environmental File No. 2607

Dear Mr. Pettko:

Atlantic Environmental of Florida, LLC (Atlantic Environmental) has completed an environmental assessment on the above-referenced ± 0.23 -acre parcel located at 120 District Street SE in Palm Bay, Florida (Figure 1). These services were completed on April 30, 2026. The following is a summary of our findings.

To determine the extent of Florida Department of Environmental Protection (FDEP) and U.S. Army Corps of Engineers (USACE) jurisdictional wetlands supported by this site, Atlantic Environmental utilized the protocol outlined in Chapter 62-340.300 in the *SJRWMD Management and Storage of Surface Waters Applicant's Handbook*, and the *Corps of Engineers Wetland Delineation Manual*. These methodologies allow the designation of wetland boundaries through the examination of certain physical indicators that may be apparent in current on-site conditions. Specifically, these indicators are: predominantly hydrophytic vegetation, hydric soil characteristics, and hydrology (signs of surface saturation or inundation for a significant length of time). In addition to the analysis of these indicators, the utilized protocols recognize the value of sound scientific judgment when determining the actual extent of state and federally jurisdictional wetlands.

Based on our findings, we determined that no FDEP or USACE jurisdictional wetlands exist on the Property and that the site consists solely of uplands (Figure 1). Vegetation on the property was dominated by slash pine (*Pinus elliottii*), cabbage palm (*Sabal palmetto*), saw palmetto (*Serenoa repens*), and cogongrass (*Imperata cylindrica*).

Lastly, Atlantic Environmental completed a listed species determination while on the subject site and determined that the site does contain gopher tortoises, a Threatened species. This species requires three environmental conditions: well drained loose soil in which to burrow, adequate low-growing herbs for food, and open sunlit sites for nesting. The entire subject site meets these criteria. After completing a 100% tortoise survey, three (3) potentially occupied tortoise burrows were located on the property (see attached Figure 1).

When a site is occupied by gopher tortoises and proposed development of the property is likely to disturb or destroy tortoise burrows, a permit is required to be obtained from the Florida Fish and Wildlife Conservation Commission (FWC) to relocate on-site resident tortoises prior to the initiation of site development.

Based on the current regulations, an applicant has the below options:

1. Avoidance: Avoid individual burrows by a sufficient distance (recommended to be 25 feet) to assure that the entire burrow is protected. FWC will prohibit such avoidance should the 25-foot buffer result in "crop circles" around the burrows isolating them from other suitable areas.

2. On-site Relocation: In cases where ten or fewer tortoise burrows are affected, a relocation permit can be obtained from FWC to relocate the tortoises on-site. For on-site relocations, adequate habitat must exist on-site following construction, upon which tortoises may be captured and released back onto the site in an area where they can move freely. A mitigation contribution of \$280.51 payable to the state is required by the FWC under this permit type. Just prior to construction, a trenched silt fence is required to be installed around the construction area at the time of the relocation to prevent any tortoises from getting in harm's way.

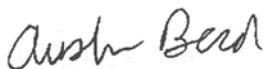
3. Off-site Relocation: If inadequate or no tortoise habitat will exist following construction, the landowner or his agents may only pursue an off-site relocation permit with an application fee of \$280.51. Also, FWC requires tortoises to be relocated to a long-term protected recipient site. The recipient site landowner's collect a fee per tortoise from the permittee to receive tortoises on their property, to employ soft release methods, and to manage tortoise habitat in perpetuity. The lowest price recipient site in this area currently charges \$6,000.00 per tortoise.

In this particular case, avoidance of the tortoise burrows does not appear to be an option nor is an on-site relocation likely feasible. As such, an off-site relocation remains the only option. The following worst-case scenario cost estimates for an off-site relocation option is as follows:

For an off-site relocation of three tortoises, the total costs include a \$280.51 application fee, \$18,000.00 in recipient site fees, \$450.00 for a backhoe, and \$1,800.00 for Atlantic Environmental's permitting and relocation fees. Please note that the actual recipient site costs won't be known until the excavation is completed.

Should you desire further services or have any questions, please do not hesitate to contact our office.

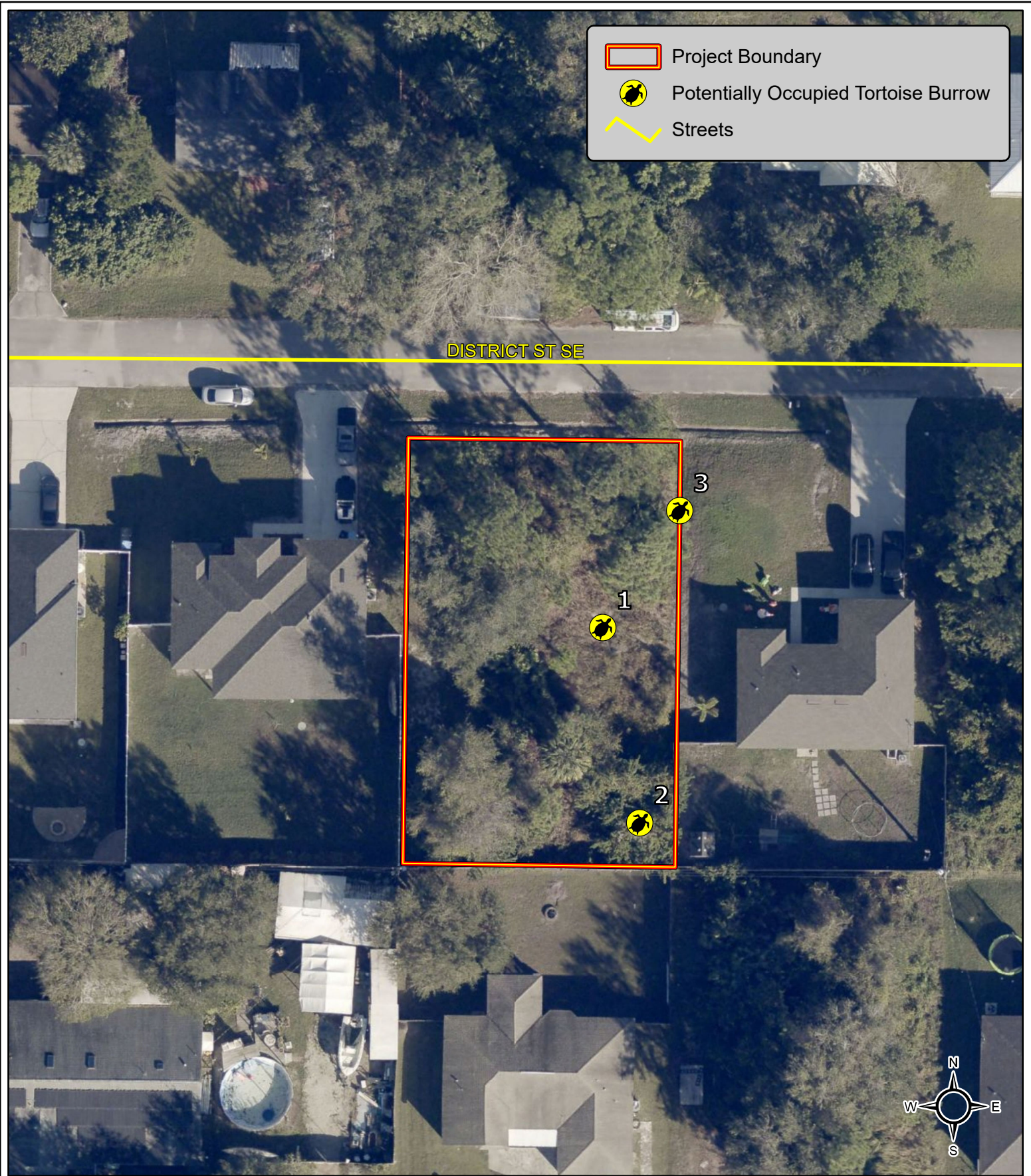
Sincerely,



Austin K. Beard, BS
Project Ecologist



Jon H. Shepherd, MS, PWS
President/Ecologist



Project: Holiday Builders - 120 District Street SE

Figure 1: Aerial Map

0 25 50 100 Feet

2025 Aerial, Brevard County, Florida



AE Proj #: 2607