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REPORT REGARDING US ARMY CORPS OF ENGINEERS APPROVAL OF SOIL CONTAMINATION ASSESSMENT ACTIVITIES AND REVISED SOURCE REMOVAL PLAN AREA C NTC ORLANDO FL

3/13/2014

JACKSONVILLE DISTRICT UNITED STATES ARMY CORPS OF ENGINEERS

DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
COCOA REGULATORY FIELD OFFICE
400 HIGH POINT DRIVE, SUITE 600
COCOA, FLORIDA 32926

REPLY TO
ATTENTION OF

March 13, 2014

Regulatory Division
North Permits Branch
Cocoa Permits Section
SAJ-2014-00460(NPR-JLC)

David Criswell
Navy BRAC Program Management Office Southeast
203 South Davis Drive, Building 247
Joint Base Charleston, South Carolina 29404

Dear Mr. Criswell:

Reference is made to the correspondence received on February 12, 2014 to the U.S. Army Corps of Engineers (Corps) regarding the potential extent of Federal jurisdiction at Druid Lake on the property known as 899 Coy Drive, Orlando and also know as Parcel 19-22-30-2626-01-011 in Section 19, Township 22 South, Range 30 East, Orange County, Florida.

The project as proposed will not require a Department of the Army permit in accordance with Section 10 of the Rivers and Harbors Act of 1899 as it is not located within navigable waters of the United States, and a permit will not be required in accordance with Section 404 of the Clean Water Act as it will not involve the discharge of dredged or fill material into waters of the United States. Provided the work is done in accordance with the enclosed drawings and project description, Department of the Army authorization will not be required.

The evaluation of this determination involved many factors and included a field visit, review of aerial photographs, geological quad sheets, county soils maps, and site specific information provided by you. A copy of the approved jurisdictional determination form is enclosed.

This letter contains an approved jurisdictional determination for your subject site. If you object to this determination/decision, you may request an administrative appeal under Corps' regulations at 33 CFR Part 331. Enclosed you will find a Notification of Appeal Process (NAP) fact sheet and Request for Appeal (RFA) form. If you request to appeal this determination, you may request an administrative appeal under Corps' regulations at 33 CFR Part 331. If you request to appeal this determination, you must submit a completed RFA form to the South Atlantic Division Office at the following address:

Mr. Jason Steele
South Atlantic Division
U.S. Army Corps of Engineers
CESAD-CM-CO-R, Room 9M15
60 Forsyth St., SW.
Atlanta, Georgia 30303-8801.

Mr. Steele can be reached by telephone number at 404-562-5137, or by facsimile at 404-562-5138.

In order for an RFA to be accepted by the Corps, the Corps must determine that it is complete, that it meets the criteria for appeal under 33 CFR Part 331.5, and that it has been received by the Division office within 60 days of the date of the RFA. Should you decide to submit an RFA form, it must be received at the above address by April 25, 2014. It is not necessary to submit an RFA form to the Division office, if you do not object to the determination/decision in this letter.

The determination shown on the enclosed information represents the upland/wetland boundary for purposes of determining the Corps jurisdictional line. As depicted on the enclosed drawing, it has been determined you have waters of the United States onsite, which are subject to regulation by the Corps, and/or you have wetlands onsite which are considered to be isolated, and thus not subjected to regulation by the Corps. Please be advised that the jurisdictional determination shown is based on the Corps of Engineers Wetlands Delineation Manual (1987) or current regional supplement, and is valid for a period no longer than 5 years from the date of this letter unless new information warrants a revision of the determination before the expiration date. If, after the 5-year period, the Corps has not specifically revalidated this jurisdictional determination, it shall automatically expire. Any reliance upon this jurisdictional determination beyond the expiration date may lead to possible violation of current Federal laws and/or regulations. You may request revalidation of the jurisdictional determination prior to the expiration date. Any revalidation or updating will be considered under the method of jurisdictional determination and other applicable regulations in use at the time of the request. Additionally, this determination has been based on information provided by you or your agent; should we determine that the information was incomplete or erroneous this delineation would be invalid.

This determination has been conducted to identify the limits of the Corps Clean Water Act jurisdiction for the particular site identified in this request. This determination may not be valid for the wetland conservation provisions of the Food Security Act of 1985, as amended. If you or your tenant are U.S. Department of Agriculture (USDA) program participants, or anticipate participation in USDA programs, you should request a certified wetland determination from the local office of the Natural Resources Conservation Service prior to starting work.

You are cautioned that work performed below the mean high water line or ordinary high water line in waters of the United States, or the discharge of dredged or fill material into adjacent wetlands, without a Department of the Army permit could subject you to enforcement action. Receipt of a permit from the Department of Environmental Protection or the Water Management District does not obviate the requirement for

obtaining a Department of the Army permit for the work described above prior to commencing work.

The Corps' Jacksonville District Regulatory Division is committed to improving service to our customers. We strive to perform our duty in a friendly and timely manner while working to preserve our environment. We invite you to visit our web site at: http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey and complete the automated Customer Service Survey. Your input is appreciated – favorable or otherwise. Please be aware this Internet address is case sensitive and should be entered as it appears above.

Thank you for your cooperation with our permit program. Should you have any questions, please contact Jim Carr at the letterhead address or by telephone at 321-504-3771, Extension 26.

Sincerely,

James L. Carr
Project Manager

Enclosures

NOTIFICATION OF ADMINISTRATIVE APPEAL OPTIONS AND PROCESS AND REQUEST FOR APPEAL		
Applicant: Navy BRAC	File Number: SAJ-2014-00460	Date: 13 March 2014 February 2014
Attached is:		See Section below
	INITIAL PROFFERED PERMIT (Standard Permit or Letter of permission)	A
	PROFFERED PERMIT (Standard Permit or Letter of permission)	B
	PERMIT DENIAL	C
X	APPROVED JURISDICTIONAL DETERMINATION	D
	PRELIMINARY JURISDICTIONAL DETERMINATION	E

SECTION I - The following identifies your rights and options regarding an administrative appeal of the above decision. Additional information may be found at http://www.usace.army.mil/CECW/Pages/reg_materials.aspx or Corps regulations at 33 CFR Part 331.

A: INITIAL PROFFERED PERMIT: You may accept or object to the permit.

- *ACCEPT: If you received a Standard Permit, you may sign the permit document and return it to the district engineer for final authorization. If you received a Letter of Permission (LOP), you may accept the LOP and your work is authorized. Your signature on the Standard Permit or acceptance of the LOP means that you accept the permit in its entirety, and waive all rights to appeal the permit, including its terms and conditions, and approved jurisdictional determinations associated with the permit.*
- OBJECT: If you object to the permit (Standard or LOP) because of certain terms and conditions therein, you may request that the permit be modified accordingly. You must complete Section II of this form and return the form to the district engineer. Your objections must be received by the district engineer within 60 days of the date of this notice, or you will forfeit your right to appeal the permit in the future. Upon receipt of your letter, the district engineer will evaluate your objections and may: (a) modify the permit to address all of your concerns, (b) modify the permit to address some of your objections, or (c) not modify the permit having determined that the permit should be issued as previously written. After evaluating your objections, the district engineer will send you a proffered permit for your reconsideration, as indicated in Section B below.

B: PROFFERED PERMIT: You may accept or appeal the permit

- *ACCEPT: If you received a Standard Permit, you may sign the permit document and return it to the district engineer for final authorization. If you received a Letter of Permission (LOP), you may accept the LOP and your work is authorized. Your signature on the Standard Permit or acceptance of the LOP means that you accept the permit in its entirety, and waive all rights to appeal the permit, including its terms and conditions, and approved jurisdictional determinations associated with the permit.*
- APPEAL: If you choose to decline the proffered permit (Standard or LOP) because of certain terms and conditions therein, you may appeal the declined permit under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

C: PERMIT DENIAL: You may appeal the denial of a permit under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

D: APPROVED JURISDICTIONAL DETERMINATION: You may accept or appeal the approved JD or provide new information.

- *ACCEPT: You do not need to notify the Corps to accept an approved JD. Failure to notify the Corps within 60 days of the date of this notice, means that you accept the approved JD in its entirety, and waive all rights to appeal the approved JD.*
- APPEAL: If you disagree with the approved JD, you may appeal the approved JD under the Corps of Engineers Administrative Appeal Process by completing Section II of this form and sending the form to the division engineer. This form must be received by the division engineer within 60 days of the date of this notice.

SECTION II - REQUEST FOR APPEAL or OBJECTIONS TO AN INITIAL PROFFERED PERMIT

REASONS FOR APPEAL OR OBJECTIONS: (Describe your reasons for appealing the decision or your objections to an initial proffered permit in clear concise statements. You may attach additional information to this form to clarify where your reasons or objections are addressed in the administrative record.)

ADDITIONAL INFORMATION: The appeal is limited to a review of the administrative record, the Corps memorandum for the record of the appeal conference or meeting, and any supplemental information that the review officer has determined is needed to clarify the administrative record. Neither the appellant nor the Corps may add new information or analyses to the record. However, you may provide additional information to clarify the location of information that is already in the administrative record.

POINT OF CONTACT FOR QUESTIONS OR INFORMATION:

If you have questions regarding this decision and/or the appeal process you may contact:	If you only have questions regarding the appeal process you may also contact:
Project Manager as noted in letter	**Jason Steele** **404-562-5137**

RIGHT OF ENTRY: Your signature below grants the right of entry to Corps of Engineers personnel, and any government consultants, to conduct investigations of the project site during the course of the appeal process. You will be provided a 15 day notice of any site investigation, and will have the opportunity to participate in all site investigations.

	Date:	Telephone number:
_____ Signature of appellant or agent.		

Work Plan Addendum
Source Removal Action

Soil Excavation and Removal at Area C Southwest

Former Naval Training Center Orlando
Orlando, Florida

Revision No. 01

Contract No. N62470-08-D-1006
Task Order No. JM46

Submitted to:

NAVFAC
Naval Facilities Engineering Command

4130 Faber Place Drive, Suite 202
North Charleston, SC 29405

Prepared by:

AGVIQ
ENVIRONMENTAL SERVICES
CH2M HILL
JOINT VENTURE

Northpark 400
1000 Abernathy Road
Suite 1600
Atlanta, GA 30328

January 2014

Work Plan Addendum
Source Removal Action

Soil Excavation and Removal at
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Submitted to:

4130 Faber Place Drive, Suite 202
North Charleston, SC 29405

Prepared by:

Northpark 400
1000 Abernathy Road
Suite 1600
Atlanta, GA 30328

January 2014

Prepared/Approved By:

Amy Twitty, P.G., Project Manager — January 10, 2014 Date

Approved By:

Sam Naik, Deputy Program Manager — January 10, 2014 Date

Client Acceptance:

U.S. Navy Responsible Authority — JAN. 31, 2014 Date

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- Contractor Daily Quality Control Report
- Preparatory Phase Report

Acronyms and Abbreviations

AGVIQ-CH2M HILL	AGVIQ-CH2M HILL Constructors, Inc. Joint Venture III
ACO	Administrative Contracting Officer
AHA	Activity Hazard Analysis
BEQ	benzo[a]pyrene equivalent
bgs	below ground surface
BMP	best management practice
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CGPD	Community Garden, Playground and Dog Run
CH2M HILL	CH2M HILL Constructors, Inc.
CLEAN	Comprehensive Long-Term Environmental Action Navy
CO	Contracting Officer
DOD ELAP	Department of Defense Environmental Laboratory Accreditation Program
DOT	U.S. Department of Transportation
EPA	U.S. Environmental Protection Agency
F.A.C.	Florida Administrative Code
FDEP	Florida Department of Environmental Protection
GIS	geographical information system
GPS	global positioning system
HAZCOM	hazard communication
HAZWOPER	Hazardous Waste Operations and Emergency Response
F.A.C.	Florida Administrative Code
FDEP	Florida Department of Environmental Protection
FEAD	Facilities Engineering and Acquisitions Division
ID	identification
IRCDQM	Installation Restoration Chemical Data Quality Manual
LF	lineal feet
LGW	leachability to groundwater
MS/MSD	matrix spike/matrix spike duplicate
MSDS	Material Safety Data Sheet
NAVFAC SE	Naval Facilities Engineering Command, Southeast
NELAC	National Environmental Laboratory Accreditation Conference
NOI	Notice of Intent
NTC	Naval Training Center
NTR	Navy Technical Representative
NWI	National Wetlands Inventory
OSHA	Occupational Safety and Health Administration
OSR	Offsite Rule
PAH	polynuclear aromatic hydrocarbon
PCB	polychlorinated biphenyl

PPE	personal protective equipment
PSI	Professional Services Industries, Inc.
QA	quality assurance
QC	quality control
RCRA	Resource Conservation and Recovery Act
RFP	Request for Proposal
RMP	Remedial Project Manager
ROICC	Resident Officer in Charge of Construction
SAP	Sampling and Analysis Plan
SCTL	soil cleanup target level
SRA	Source Removal Action
SOP	Standard Operating Procedure
SSC	Site Safety Coordinator
SVOC	semivolatile organic compound
SW	Southwest
SWPPP	Storm Water Pollution Prevention Plan
T&D	transportation and disposal
TAL	Target Analyte List
TAT	turnaround time
TCL	Target Compound List
TCLP	Toxicity Characteristic Leaching Procedure
TO	Task Order
TRPH	total recoverable petroleum hydrocarbon
TSDF	treatment, storage, and disposal facility
TtNUS	Tetra Tech NUS, Inc.
UCL95	95 percent Upper Confidence Limit
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
VOC	volatile organic compound
WMP	Waste Management Plan
yd^3	cubic yards

1.0 Introduction

AGVIQ-CH2M HILL Constructors, Inc. Joint Venture III (AGVIQ-CH2M HILL) has been contracted by the Department of the Navy, Naval Facilities Engineering Command, Southeast (NAVFAC SE), to prepare this Work Plan Addendum under Contract No. N62470-08-D-1006, Task Order (TO) No. JM46. The purpose of this Work Plan Addendum is to outline the procedures to be used to implement a Source Removal Action (SRA) that includes excavating, loading, and transporting contaminated soil for offsite disposal from Building 148 and the proposed Community Garden, Playground and Dog Run (CGPD) located within Area C Southwest (SW) at the former Naval Training Center (NTC) Orlando in Orlando, Florida. This SRA is being executed under Florida Administrative Code (F.A.C.) Chapter 62-780.500. This Work Plan Addendum includes the procedures for the labor, equipment, and materials necessary to accomplish the targeted goals outlined within the Request for Proposal (RFP) dated December 22, 2011; and subsequent agreements, discussions and negotiations held with NAVFAC SE and NAVFAC Atlantic Division on January 13, 2012 and January 20, 2012; and the Letter of Concurrence submitted to NAVFAC SE on September 9, 2013. It should be noted that this Work Plan Addendum will serve as a "master" work plan to cover the tasks to be provided by AGVIQ under Contract No. N62470-12-D-7004, TO No. JM13.

Additional references provided to AGVIQ-CH2M HILL by NAVFAC SE and used to develop this Work Plan Addendum include the following documents:

- *Technical Memorandum, Limited Soil Sampling and Analysis Report, Building 148, Area C, Naval Training Center Orlando, Orlando, FL,* Tetra Tech NUS, Inc. (TtNUS), October 5, 2011
- *Limited Soil Sampling Activities Area C, Building 148, Former Naval Training Center Orlando, Orange County, Florida, Area,* Professional Services Industries, Inc. (PSI) June 6, 2011
- *Limited Soil Sampling Activities, Proposed Community Garden, Dog Run and Playground, Area C, Former Naval Training Center Orlando, Orange County, Florida,* PSI, September 19, 2011
- Figures and tables provided by Resolution Consultants showing the delineated soil areas and volumes, July 3, 2013

The following activities will be performed under this Work Plan Addendum:

- Evaluation of potential impacts to wetlands on the south side of Lake Druid, including the completion of a wetland delineation to be conducted in accordance with applicable state and federal rules
- Preparation and submittal of an Environmental Resource Permit application for authorization from the Florida Department of Environmental Protection (FDEP) and the U.S. Army Corps of Engineers (USACE) to address potential impact to the Lake Druid wetlands during the remediation activities

- Preparation of a Storm Water Pollution Prevention Plan (SWPPP) and submittal of a Notice of Intent (NOI) to obtain stormwater permit coverage
- Pre-excavation in situ soil sampling for waste characterization and backfill sampling from two area source locations
- Excavation of soil and direct loading of impacted soil for offsite disposal
- Backfill, compaction, site restoration (including hydroseeding with native seed mix), and wetland restoration
- Preparation and submittal of Interim Source Removal Report

This Work Plan Addendum has been prepared in accordance with NAVFAC SE and FDEP requirements. The objective of the Work Plan Addendum is to ensure the safe and efficient completion of soil removal activities.

1.1 Site Description and Background

In January 2009, Area C SW, a 19.73-acre parcel of the former NTC Orlando, was transferred to the City of Orlando for public park and recreation area purposes through the Federal Lands to Parks Program of the United States Department of Interior, National Park Service. In preparation for site development, Building 148, the former Cold Storage Building located at Area C SW, was demolished by the City of Orlando in May 2011. Following demolition, the soil beneath the building was stockpiled and sampled prior to disposal by the City of Orlando's environmental consultant, PSI.

The Navy received a Notice of Environmental Claim letter dated July 22, 2011 from the City of Orlando officially notifying the Navy of the surface soil sampling results from Building 148 that indicated concentrations of certain polynuclear aromatic hydrocarbons (PAHs) and pesticide compounds greater than FDEP Residential Soil Cleanup Target Levels (SCTLs).

The Comprehensive Long-Term Environmental Action Navy (CLEAN) contractors TtNUS and Resolution Consultants collected additional soil samples across Area C SW. Based on the additional soil sampling results, the Navy decided to remove the contaminated soil to concentrations at or below the residential land use based health-protective criteria based on the site-wide 95 percent Upper Confidence Limit (UCL95), and dispose of the excavated soil at an offsite, permitted, non-hazardous waste disposal facility. Appendix A presents the UCL95 results from Resolution Consultants.

Figure 1-1 shows the location of Area C SW, NTC Orlando, and Figure 1-2 shows the location of the site within Area C SW, NTC Orlando.

1.2 Project Objective

The project objective is to implement the SRA, by excavating contaminated soils to a maximum of 8 feet below ground surface (bgs) (or the water table, whichever is less) at Area C SW, and dispose of the soil offsite at a permitted facility approved to accept the wastes.

N

0 1,000 2,000 4,000 Feet

Figure 1-1
General Location Map
Work Plan, Naval Training Center Orlando

AGVIQ CH2M HILL

\\cypress\proj\environmental\drawings\Naval Training Center Orlando\MXD\Figure 1-1 Location Map.mxd 02/07/2014

2.0 Project Execution Plan

The scope of work, project schedule, communication plan, and traffic control plan are provided in this section.

2.1 Scope of Work

The activities associated with the scope of work at Area C SW include the following:

- Pre-disposal sampling of the in situ soil for waste characterization and the verification sampling of soil backfill sources to confirm that backfill is uncontaminated
- Preparation of a SWPPP and submittal of a NOI for coverage under the 2009 Generic Permit for Stormwater Discharge from Large and Small Construction Activities
- Delineation of the wetlands along the south side of Lake Druid
- Filing and obtaining an Environmental Resource Permit from FDEP or approval under the State's General Permit for Soil Remediation to perform excavations in a wetland and a federal dredge and fill permit from USACE if the site does not qualify for de minimus exemption
- Mobilization, site preparation, underground utility survey, installation of an erosion control silt fence, and establishment of proposed excavation boundaries
- Excavation of approximately 2,833 cubic yards (yd^3) of contaminated soil from 0 to 6 inches bgs from Building 148 and the CGPD areas
- Excavation of approximately 4,522 yd^3 of contaminated soil from 6 to 24 inches bgs from Building 148 and the CGPD areas
- Excavation of approximately 2,579 yd^3 (including 117 yd^3 of sloping material) of contaminated soil from 2 feet bgs to the water table from the Building 148 area
- Load-out, transport, and offsite disposal of excavated soil at a Subtitle D or C landfill
- Import and placement of pre-approved/certified clean backfill within the excavations
- Site restoration to original grade including hydroseeding with native grass seed mix and wetland mitigation/restoration
- Preparation and submittal of Interim Source Removal Report

Each of these activities is described further in the following sections.

2.1.1 Stormwater Permitting

Construction activities that will disturb more than 1 acre must obtain coverage under the 2009 Generic Permit for Stormwater Discharge from Large and Small Construction Activities (stormwater permit). To obtain permit coverage AGVIQ-CH2M HILL will submit

a NOI as the Operator as defined in Part II of the stormwater permit (contractor that operates the construction activity and that has authority to control those activities at the project necessary to ensure compliance with the stormwater permit). To comply with the stormwater permit, a SWPPP that includes the following will be prepared:

- Site description including a description of pollutant sources
- Description of best management practices (BMPs), specifically:
  - Erosion and sediment controls
  - Permanent stormwater management controls
  - Controls for pollutants other than sediment
- BMP maintenance
- BMP site inspections
- Non-stormwater discharges
- Contractor certification

AGVIQ-CH2M HILL will submit a Notice of Termination to FDEP within 14 days of final stabilization, as required by the stormwater permit. Final stabilization means that all soil disturbing activities at the site have been completed, and that a uniform (e.g., evenly distributed, without large bare areas) perennial vegetative cover with a density of at least 70 percent for all unpaved areas and areas not covered by permanent structures has been established or equivalent permanent stabilization measures (e.g., geotextiles) have been employed.

2.1.2 Wetland Delineation and Permitting

In accordance with the Florida Unified Wetland Delineation Methodology (Chapter 62-340 F.A.C.) and Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Atlantic and Gulf Coastal Plain Region (Version 2.0) (USACE, 2010), wetlands and surface waters within the limits of proposed excavation activities will be delineated to their full extent.

FDEP defines wetlands as "those areas that are inundated or saturated by surface water or groundwater at a frequency and duration sufficient to support, and under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soils. Soils present in wetlands generally are classified as hydric or alluvial, or possess characteristics that are associated with reducing soil conditions" (FDEP, 2012). FDEP goes on to describe Florida wetland habitats as "swamps, marshes, bayheads, bogs, cypress domes and strands, sloughs, wet prairies, riverine swamps and marshes, hydric seepage slopes, tidal marshes, mangrove swamps and other similar areas" (FDEP, 2012).

The aerial extent of existing wetland habitats on the south side of Lake Druid will be investigated by conducting desktop literature searches of available information (online and published), followed by field verification. The main literature source to be reviewed for historical documentation of the project area will be the National Wetlands Inventory (NWI) online Wetlands Mapper (U.S. Fish and Wildlife Service [USFWS], 2009).

Field delineation of wetlands and surface waters will entail identifying and quantifying hydrophytic vegetation, assessing for the presence of hydric soils and geomorphology, and identifying signs of hydrologic activity. Once wetland and/or surface water boundaries are identified by AGVIQ-CH2M HILL staff, the boundaries will be marked with bright pink wetland flagging tape and recorded with global positioning system (GPS). Data collected by GPS will be sent to a geographical information system (GIS) analyst for processing and mapping. Later, FDEP and USACE will formally verify and confirm the delineation during an onsite inspection.

The permitting phase of this task includes pre-application meetings between the Navy (as the permittee) and FDEP and USACE to discuss the appropriate types of permits and required information, preparing an application package for an ERP from FDEP and a Clean Water Act Section 404 Dredge and Fill Permit from USACE, and responding to agency requests for additional information after the application has been submitted.

2.1.3 Mobilization and Site Preparation

This task includes the mobilization of all personnel and equipment to the work area (shown on Figure 1-2) to implement field activities. Laydown areas will be located for staging of materials and equipment. If necessary, access roads and construction entrances will be prepared for the areas to be used and construction entrances established. The site access route is shown on Figure 2-1. Figure 2-2 presents the staging and decontamination areas.

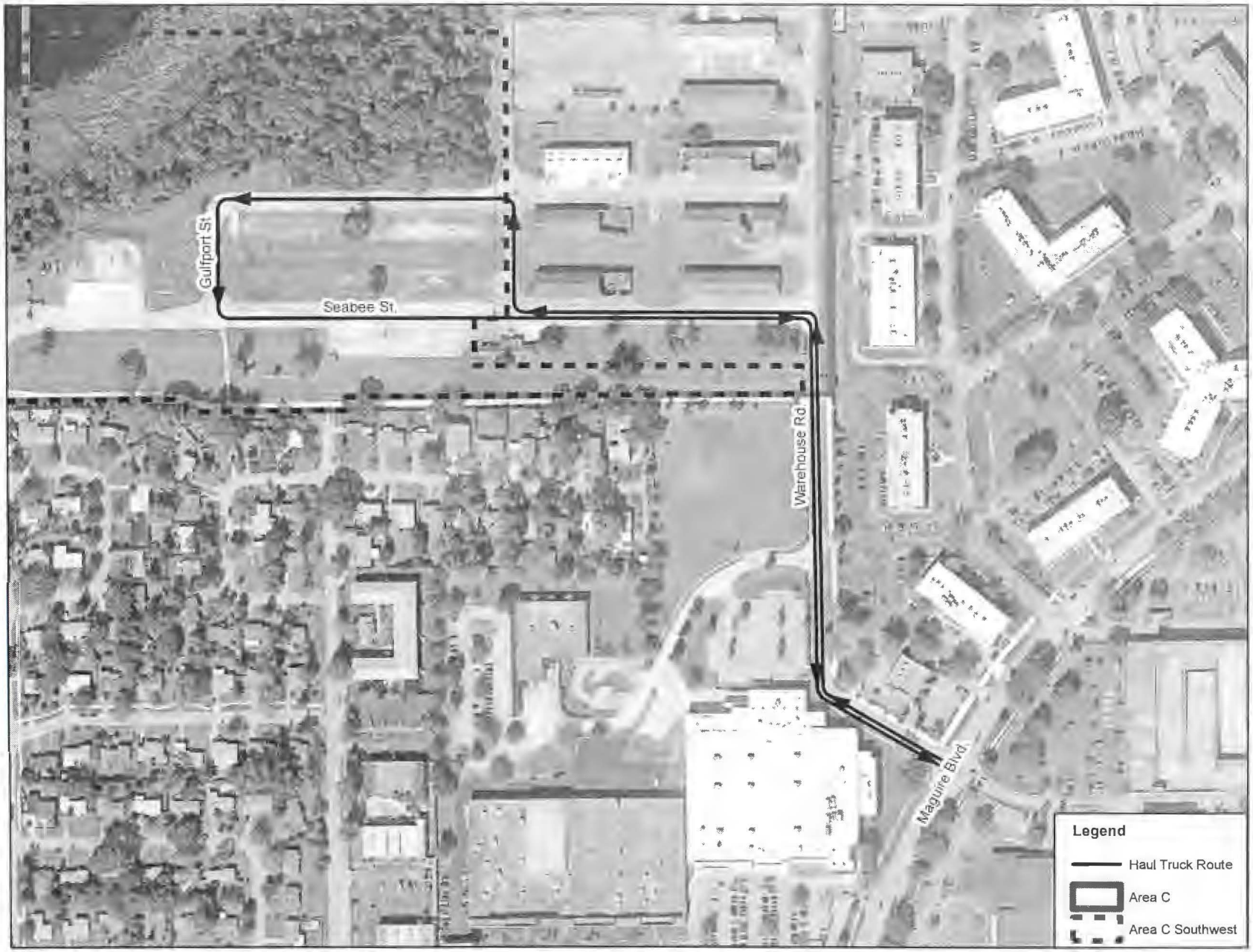
AGVIQ-CH2M HILL will coordinate with Sunshine State One Call of Florida and the City of Orlando to identify and conduct a third-party utilities locating survey to mark any known utilities in the excavation area with pin flags. Utilities that are identified in the work area will be protected during the work. Any damage to utilities will be immediately reported to the City of Orlando and the Facilities Engineering and Acquisitions Division (FEAD) and subsequently repaired using approved methods.

A Florida-registered surveyor will mobilize to the site to obtain coordinates of pre-excavation sampling locations (estimated to be about 100 points) and excavation layouts and elevations.

Silt fencing for temporary erosion and sediment control will be constructed in accordance with the SWPPP.

2.1.4 Soil Excavation

The final lateral and vertical dimensions of the excavations were determined after additional confirmatory soil sampling and analysis was completed by the CLEAN contractor, Resolution Consultants. The excavation extents were determined by delineating soil contaminant concentrations (dieldrin and benzo[a]pyrene equivalents [BEQs]) to Residential Soil Cleanup Target Levels (SCTLs), both horizontally and vertically. The excavation areas were determined using the Residential UCL95 for BEQs in multiple, quarter-acre exposure units.



Note:
© 2013 Google Aerial Dated 1/22/2013

FIGURE 2-1
Truck Route Map
Work Plan, Naval Training Center Orlando

AGVIQ CH2M HILL

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Note:
© 2013 Google Aerial Dated 1/22/2013

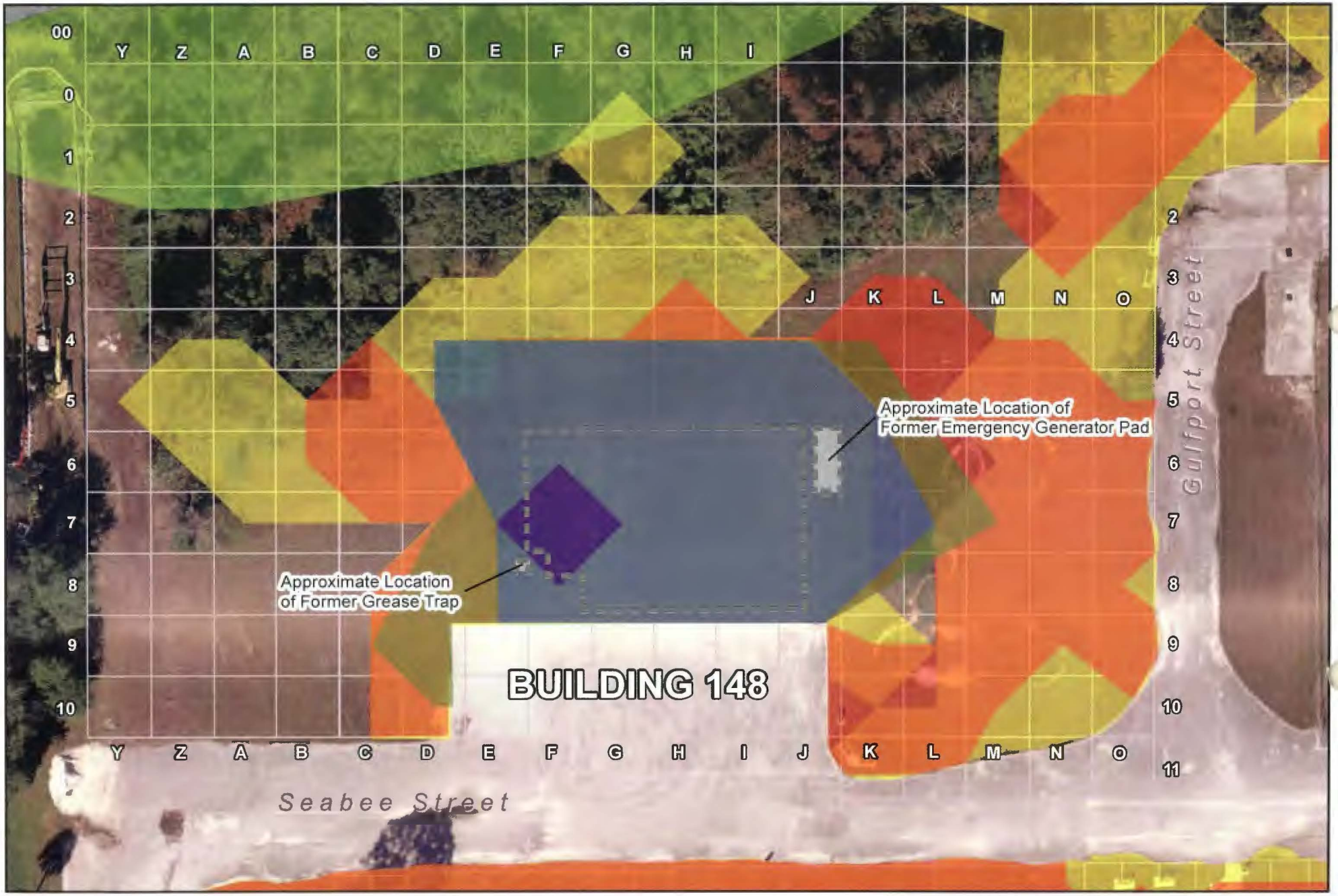
FIGURE 2-2
Site Laydown and Decontamination Area
Work Plan, Naval Training Center Orlando

AGVIQ CH2M HILL

\\cypress\proj\environmental\drawings\Naval Training Center Orlando\MXD\Figure 2-2 Naval Train Center.mxd 10/23/2013


BaP Equivalent Concentration (mg/kg)
BaP Eq ≤ Residential SCTL
Residential SCTL < BaP Eq ≤ 3x Residential SCTL
BaP Eq > 3x Residential SCTL
BaP Eq > 3x Recreational BaP Criteria
Dieldrin Concentration (mg/kg)
Residential SCTL < Dieldrin ≤ Industrial SCTL
Dieldrin > Industrial SCTL
Dieldrin < Residential SCTL
2003 PAH/Arsenic Sample Locations (0-24 Inches BLS)
2003 PAH Sample Locations (0-24 Inches BLS)
1996 Arsenic Screening Locations (0-12 Inches BLS)
Sample Collected by PBR; Residential SCTL < BaP Eq ≤ Industrial SCTL
Limits of Excavation Area to a Depth of 2 Feet BLS (Feb 2004)
Extent > Residential SCTL
Proposed Extent of Excavation > Residential 95% UCL
Proposed Additional 0-6" Excavation Due to 6-24" Excavation
95% UCL Exposure Units
Wet, Sample Not Collected
Former Location of Bldg 146
Freshwater Pond
Freshwater Emergent Wetland
SA 56 (PLAYGROUND)
SA 56 (GARDEN)
SA 56 (DOG RUN)
R11B=0.253 acres
R13B=0.247 acres
R18A=0.245 acres


SA 56 (PLAYGROUND)
SA 56 (GARDEN)
SA 56 (DOG RUN)
ScreeningScreening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Y Z A B C D E F G H I J K L M N O
Approximate Location of Former Emergency Generator Pad
Approximate Location of Former Grease Trap
BUILDING 148
Gulfport Street
Seabee Street

APPROVED JURISDICTIONAL DETERMINATION FORM
U.S. Army Corps of Engineers

This form should be completed by following the instructions provided in Section IV of the JD Form Instructional Guidebook.

SECTION I: BACKGROUND INFORMATION

A. REPORT COMPLETION DATE FOR APPROVED JURISDICTIONAL DETERMINATION (JD): 21 February 2014

B. DISTRICT OFFICE, FILE NAME, AND NUMBER: Cocoa Regulatory Field Office, Cocoa, Florida, Orlando, NAVY BRAC – Former Naval Training Center, Orlando , SAJ 2014-00460 (NPR-JLC)

C. PROJECT LOCATION AND BACKGROUND INFORMATION: The project is situated northeast of the intersection of State Road 50 and North Bumby Avenue on the southeast side of Druid Lake in Section 19, Township 22 South, Range 30 East, Orlando, Orange County, Florida.

State:FL County/parish/borough: Orange City: N/A
Center coordinates of site (lat/long in degree decimal format): Lat. 28.559395° N, Long. 81.348367° W.
Universal Transverse Mercator:
Name of nearest waterbody: Druid Lake
Name of nearest Traditional Navigable Water (TNW) into which the aquatic resource flows: None
Name of watershed or Hydrologic Unit Code (HUC): HUC 10 – 0309010101 – East Lake Tohopekaliga – (Source: USACE Google Earth Resources at Risk)

☒ Check if map/diagram of review area and/or potential jurisdictional areas is/are available upon request.
☐ Check if other sites (e.g., offsite mitigation sites, disposal sites, etc…) are associated with this action and are recorded on a different JD form.

D. REVIEW PERFORMED FOR SITE EVALUATION (CHECK ALL THAT APPLY):

☒ Office (Desk) Determination:. 21 February 2014
☒ Field Determination. Date(s): 21 February 2014

SECTION II: SUMMARY OF FINDINGS

A. RHA SECTION 10 DETERMINATION OF JURISDICTION.

There **Are no** *"navigable waters of the U.S."* within Rivers and Harbors Act (RHA) jurisdiction (as defined by 33 CFR part 329) in the review area. [*Required*]

☐ Waters subject to the ebb and flow of the tide.
☐ Waters are presently used, or have been used in the past, or may be susceptible for use to transport interstate or foreign commerce.
Explain: .

B. CWA SECTION 404 DETERMINATION OF JURISDICTION.

There Are NO *"waters of the U.S."* within Clean Water Act (CWA) jurisdiction (as defined by 33 CFR part 328) in the **review area**

1. Waters of the U.S.

a. Indicate presence of waters of U.S. in review area (check all that apply): [1]

☐ TNWs, including territorial seas
☐ Wetlands adjacent to TNWs
☐ Relatively permanent waters[2] (RPWs) that flow directly or indirectly into TNWs
☐ Non-RPWs that flow directly or indirectly into TNWs
☐ Wetlands directly abutting RPWs that flow directly or indirectly into TNWs
☐ Wetlands adjacent to but not directly abutting RPWs that flow directly or indirectly into TNWs
☐ Wetlands adjacent to non-RPWs that flow directly or indirectly into TNWs
☐ Impoundments of jurisdictional waters
☐ Isolated (interstate or intrastate) waters, including isolated wetlands

b. Identify (estimate) size of waters of the U.S. in the review area:
Non-wetland waters:
Wetlands:

c. Limits (boundaries) of jurisdiction based on: 1987 Delineation Manual and the Atlantic/Gulf Coastal Plain Supplement
Elevation of established OHWM (if known):.

2. Non-regulated waters/wetlands (check if applicable):[3]

☒ Potentially jurisdictional waters and/or wetlands were assessed within the review area and determined to be not jurisdictional.
Explain: **There is one lake (Druid Lake) that is approximately 21 acres in size including it associated**

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[1] Boxes checked below shall be supported by completing the appropriate sections in Section III below.
[2] For purposes of this form, an RPW is defined as a tributary that is not a TNW and that typically flows year-round or has continuous flow at least "seasonally" (e.g., typically 3 months).
[3] Supporting documentation is presented in Section III.F.

wetlands. Druid Lake has no wetland vegetative connection or surface hydrologic connection to other surface waters or wetlands. There are no known hydrologic data indicating a sub-surface water connection between Druid Lake and any other surface water systems. Druid Lake does not have a substantial nexus either alone or in combination with any known TNW.

SECTION III: CWA ANALYSIS

A. TNWs AND WETLANDS ADJACENT TO TNWs

The agencies will assert jurisdiction over TNWs and wetlands adjacent to TNWs. If the aquatic resource is a TNW, complete Section III.A.1 and Section III.D.1. only; if the aquatic resource is a wetland adjacent to a TNW, complete Sections III.A.1 and 2 and Section III.D.1.; otherwise, see Section III.B below.

1. **TNW**
   Identify TNW: .

   Summarize rationale supporting determination: .

2. **Wetland adjacent to TNW**
   Summarize rationale supporting conclusion that wetland is "adjacent": .

B. CHARACTERISTICS OF TRIBUTARY (THAT IS NOT A TNW) AND ITS ADJACENT WETLANDS (IF ANY):

This section summarizes information regarding characteristics of the tributary and its adjacent wetlands, if any, and it helps determine whether or not the standards for jurisdiction established under *Rapanos* have been met.

The agencies will assert jurisdiction over non-navigable tributaries of TNWs where the tributaries are "relatively permanent waters" (RPWs), i.e. tributaries that typically flow year-round or have continuous flow at least seasonally (e.g., typically 3 months). A wetland that directly abuts an RPW is also jurisdictional. If the aquatic resource is not a TNW, but has year-round (perennial) flow, skip to Section III.D.2. If the aquatic resource is a wetland directly abutting a tributary with perennial flow, skip to Section III.D.4.

A wetland that is adjacent to but that does not directly abut an RPW requires a significant nexus evaluation. Corps districts and EPA regions will include in the record any available information that documents the existence of a significant nexus between a relatively permanent tributary that is not perennial (and its adjacent wetlands if any) and a traditional navigable water, even though a significant nexus finding is not required as a matter of law.

If the waterbody[4] is not an RPW, or a wetland directly abutting an RPW, a JD will require additional data to determine if the waterbody has a significant nexus with a TNW. If the tributary has adjacent wetlands, the significant nexus evaluation must consider the tributary in combination with all of its adjacent wetlands. This significant nexus evaluation that combines, for analytical purposes, the tributary and all of its adjacent wetlands is used whether the review area identified in the JD request is the tributary, or its adjacent wetlands, or both. If the JD covers a tributary with adjacent wetlands, complete Section III.B.1 for the tributary, Section III.B.2 for any onsite wetlands, and Section III.B.3 for all wetlands adjacent to that tributary, both onsite and offsite. The determination whether a significant nexus exists is determined in Section III.C below.

1. **Characteristics of non-TNWs that flow directly or indirectly into TNW**

   (i) General Area Conditions:
   Watershed size:
   Drainage area:
   Average annual rainfall: inches
   Average annual snowfall:

   (ii) Physical Characteristics:
   (a) Relationship with TNW:
   ☐ Tributary flows directly into TNW.
   ☐ Tributary flows through one tributary before entering TNW.

   Project waters are 0 river miles from TNW.
   Project waters are 0 river miles from RPW.
   Project waters are 0 aerial (straight) miles from TNW.
   Project waters are 0 aerial (straight) miles from RPW.

[4] Note that the Instructional Guidebook contains additional information regarding swales, ditches, washes, and erosional features generally and in the arid West.

Project waters cross or serve as state boundaries. Explain:.
Identify flow route to TNW[5]: .
Tributary stream order, if known:

(b) General Tributary Characteristics (check all that apply):

Tributary is: ☐ Natural
☐ Artificial (man-made). Explain:.
☐ Manipulated (man-altered).

Tributary properties with respect to top of bank (estimate):
Average width:
Average depth: t
Average side slopes:

Primary tributary substrate composition (Estimates):

☐ Silts	☐ Sands	☐ Concrete
☐ Cobbles	☐ Gravel	☐ Muck
☐ Bedrock	☐ Vegetation. Forested:	
☐ Other. Explain: .		

Tributary condition/stability [e.g., highly eroding, sloughing banks]. Explain: .
Presence of run/riffle/pool complexes.
Tributary geometry:
Tributary gradient (approximate average slope):

(c) Flow:
Tributary provides for:
Estimate average number of flow events in review area/year:
Describe flow regime:
Other information on duration and volume:
Surface flow is: continuous
Subsurface flow: Pick List. Explain findings: .
☐ Dye (or other) test performed: .
Tributary has (Estimated check all that apply):
☐ Bed and banks
☐ OHWM[6] (check all indicators that apply): estimated based on other similar streams in the area

☐ clear, natural line impressed on the bank	☐ the presence of litter and debris
☐ changes in the character of soil	☐ destruction of terrestrial vegetation
☐ shelving	☐ the presence of wrack line
☐ vegetation matted down, bent, or absent	☐ sediment sorting
☐ leaf litter disturbed or washed away	☐ scour
☐ sediment deposition	☐ multiple observed or predicted flow events
☐ water staining	☐ abrupt change in plant community
☐ other (list):	

☐ Discontinuous OHWM.[7] Explain: .

If factors other than the OHWM were used to determine lateral extent of CWA jurisdiction (check all that apply):

☐ High Tide Line indicated by:	☐ Mean High Water Mark indicated by:
☐ oil or scum line along shore objects	☐ survey to available datum;
☐ fine shell or debris deposits (foreshore)	☐ physical markings;
☐ physical markings/characteristics	☐ vegetation lines/changes in vegetation types.
☐ tidal gauges	
☐ other (list):	

(iii) Chemical Characteristics:

(iv) Biological Characteristics. Channel supports (check all that apply):
☐ Riparian corridor. Characteristics (type, average width):
☐ Wetland fringe. Characteristics:.
☐ Habitat for:
☐ Federally Listed species. ,
☐ Fish/spawn areas.Flowing river system and its associated lake is expected to contain fish and areas for spawning.
☐ Other environmentally-sensitive species. ,

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[5] Flow route can be described by identifying, e.g., tributary a, which flows through the review area, to flow into tributary b, which then flows into TNW.
[6] A natural or man-made discontinuity in the OHWM does not necessarily sever jurisdiction (e.g., where the stream temporarily flows underground, or where the OHWM has been removed by development or agricultural practices). Where there is a break in the OHWM that is unrelated to the waterbody's flow regime (e.g., flow over a rock outcrop or through a culvert), the agencies will look for indicators of flow above and below the break.
[7] Ibid.

☐ Aquatic/wildlife diversity..

2. **Characteristics of wetlands adjacent to non-TNW that flow directly or indirectly into TNW. See Section III D 4 for wetlands directly abutting an RPW.**

(i) Physical Characteristics: Forested wetland abutting RPW, See Section III D 4.

(a) General Wetland Characteristics:
Properties:
Wetland size:
Wetland type.
Wetland quality.
Project wetlands cross or serve as state boundaries.:.

(b) General Flow Relationship with Non-TNW:
Flow is:
Surface flow is:
Characteristics:

Subsurface flow: Pick List. Explain findings: not known.
☐ Dye (or other) test performed: .

(c) Wetland Adjacency Determination with Non-TNW:
☐ Directly abutting
☐ Not directly abutting
☐ Discrete wetland hydrologic connection. Explain: .
☐ Ecological connection. Explain: .
☐ Separated by berm/barrier. Explain: .

(d) Proximity (Relationship) to TNW
Project wetlands are
Project waters are
Flow is from north to south:.
Estimate approximate location of wetland as within the floodplain.

(ii) Chemical Characteristics:
Characterize wetland system (e.g., water color is clear, brown, oil film on surface; water quality; general watershed characteristics; etc.). Explain:.
Identify specific pollutants, if known:.

(iii) Biological Characteristics. Wetland supports (check all that apply):
☐ Riparian buffer. Characteristics (type, average width).
☐ Vegetation type/percent cover. 100% Explain:. \
☐ Habitat for:
☐ Federally Listed species. Explain findings:
☐ Fish/spawn areas. Explain findings:.
☐ Other environmentally-sensitive species. Explain findings
☐ Aquatic/wildlife diversity. Explain findings:

3. **Characteristics of all wetlands adjacent to the tributary (if any)**
All wetland(s) being considered in the cumulative analysis:

Directly abuts? (Y)	Size (in acres)
Wetland .	

Summarize overall biological, chemical and physical functions being performed:.

C. SIGNIFICANT NEXUS DETERMINATION

A significant nexus analysis will assess the flow characteristics and functions of the tributary itself and the functions performed by any wetlands adjacent to the tributary to determine if they significantly affect the chemical, physical, and biological integrity of a TNW. For each of the following situations, a significant nexus exists if the tributary, in combination with all of its adjacent wetlands, has more than a speculative or insubstantial effect on the chemical, physical and/or biological integrity of a TNW. Considerations when evaluating significant nexus include, but are not limited to the volume, duration, and frequency of the flow of water in the tributary and its proximity to a TNW, and the functions performed by the tributary and all its adjacent wetlands. It is not appropriate to determine significant nexus based solely on any specific threshold of distance (e.g. between a tributary and its adjacent wetland or between a tributary and the TNW). Similarly, the fact an adjacent wetland lies within or outside of a floodplain is not solely determinative of significant nexus.

Draw connections between the features documented and the effects on the TNW, as identified in the *Rapanos* Guidance and discussed in the Instructional Guidebook. Factors to consider include, for example:

- Does the tributary, in combination with its adjacent wetlands (if any), have the capacity to carry pollutants or flood waters to TNWs, or to reduce the amount of pollutants or flood waters reaching a TNW?
- Does the tributary, in combination with its adjacent wetlands (if any), provide habitat and lifecycle support functions for fish and other species, such as feeding, nesting, spawning, or rearing young for species that are present in the TNW?
- Does the tributary, in combination with its adjacent wetlands (if any), have the capacity to transfer nutrients and organic carbon that support downstream foodwebs?
- Does the tributary, in combination with its adjacent wetlands (if any), have other relationships to the physical, chemical, or biological integrity of the TNW?

Note: the above list of considerations is not inclusive and other functions observed or known to occur should be documented below:

1. **Significant nexus findings for non-RPW that has no adjacent wetlands and flows directly or indirectly into TNWs.** Explain findings of presence or absence of significant nexus below, based on the tributary itself, then go to Section III.D: .

2. **Significant nexus findings for non-RPW and its adjacent wetlands, where the non-RPW flows directly or indirectly into TNWs.** Explain findings of presence or absence of significant nexus below, based on the tributary in combination with all of its adjacent wetlands, then go to Section III.D: .

3. **Significant nexus findings for wetlands adjacent to an RPW but that do not directly abut the RPW.** Explain findings of presence or absence of significant nexus below, based on the tributary in combination with all of its adjacent wetlands, then go to Section III.D: .

4. **Significant nexus findings for wetlands directly abutting an RPW.**

5. **Significant nexus findings for an RPW (perennial or seasonal).** Explain findings of presence or absence of significant nexus below, based on the tributary, then go to Section III.D: Please see the Section C4 above. .

D. DETERMINATIONS OF JURISDICTIONAL FINDINGS. THE SUBJECT WATERS/WETLANDS ARE (CHECK ALL THAT APPLY):

1. **TNWs and Adjacent Wetlands.** Check all that apply and provide size estimates in review area:
   - ☒ TNWs: linear feet width (ft), Or, acres.
   - ☒ Wetlands adjacent to TNWs: acres.

2. **RPWs that flow directly or indirectly into TNWs.**
   - ☒ Tributaries of TNWs where tributaries typically flow year-round are jurisdictional. Provide data and rationale indicating that tributary is perennial: ..
   - ☒ Tributaries of TNW where tributaries have continuous flow "seasonally" (e.g., typically three months each year) are jurisdictional. Data supporting this conclusion is provided at Section III.B. Provide rationale indicating that tributary flows seasonally: .

   Provide estimates for jurisdictional waters in the review area (check all that apply):
   - ☒ Tributary waters (ft).
   - ☒ Other non-wetland waters: acres.
     Identify type(s) of waters:.

3. **Non-RPWs[8] that flow directly or indirectly into TNWs.**
   - ☒ Waterbody that is not a TNW or an RPW, but flows directly or indirectly into a TNW, and it has a significant nexus with a TNW is jurisdictional. Data supporting this conclusion is provided at Section III.C.

   Provide estimates for jurisdictional waters within the review area (check all that apply):
   - ☒ Tributary waters: linear feet width (ft).
   - ☒ Other non-wetland waters: acres.
     Identify type(s) of waters: .

4. **Wetlands directly abutting an RPW that flow directly or indirectly into TNWs.**
   - ☒ Wetlands directly abut RPW and thus are jurisdictional as adjacent wetlands.
     - ☒ Wetlands directly abutting an RPW where tributaries typically flow year-round. Provide data and rationale indicating that tributary is perennial in Section III.D.2. above..

[8]See Footnote # 3.

☐ Wetlands directly abutting an RPW where tributaries typically flow "seasonally." Provide data indicating that tributary is seasonal in Section III.B and rationale in Section III.D.2, above. Provide rationale indicating that wetland is directly abutting an RPW:.

☐ Provide acreage estimates for jurisdictional wetlands in the review area:

5. **Wetlands adjacent to but not directly abutting an RPW that flow directly or indirectly into TNWs.**
☐ Wetlands that do not directly abut an RPW, but when considered in combination with the tributary to which they are adjacent and with similarly situated adjacent wetlands, have a significant nexus with a TNW are jurisidictional. Data supporting this conclusion is provided at Section III.C.

Provide acreage estimates for jurisdictional wetlands in the review area: acres.

6. **Wetlands adjacent to non-RPWs that flow directly or indirectly into TNWs.**
☐ Wetlands adjacent to such waters, and have when considered in combination with the tributary to which they are adjacent and with similarly situated adjacent wetlands, have a significant nexus with a TNW are jurisdictional. Data supporting this conclusion is provided at Section III.C.

Provide estimates for jurisdictional wetlands in the review area: acres.

7. **Impoundments of jurisdictional waters.**[9]
As a general rule, the impoundment of a jurisdictional tributary remains jurisdictional.
☐ Demonstrate that impoundment was created from "waters of the U.S.," or
☐ Demonstrate that water meets the criteria for one of the categories presented above (1-6), or
☐ Demonstrate that water is isolated with a nexus to commerce (see E below).

E. ISOLATED [INTERSTATE OR INTRA-STATE] WATERS, INCLUDING ISOLATED WETLANDS, THE USE, DEGRADATION OR DESTRUCTION OF WHICH COULD AFFECT INTERSTATE COMMERCE, INCLUDING ANY SUCH WATERS (CHECK ALL THAT APPLY):[10]
☐ which are or could be used by interstate or foreign travelers for recreational or other purposes.
☐ from which fish or shellfish are or could be taken and sold in interstate or foreign commerce.
☐ which are or could be used for industrial purposes by industries in interstate commerce.
☐ Interstate isolated waters. Explain: .
☐ Other factors. Explain: .

Identify water body and summarize rationale supporting determination: .
Provide estimates for jurisdictional waters in the review area (check all that apply):
☐ Tributary waters: linear feet width (ft).
☐ Other non-wetland waters: acres.
Identify type(s) of waters: .
☐ Wetlands: acres.

F. NON-JURISDICTIONAL WATERS, INCLUDING WETLANDS (CHECK ALL THAT APPLY):
☐ If potential wetlands were assessed within the review area, these areas did not meet the criteria in the 1987 Corps of Engineers Wetland Delineation Manual and/or appropriate Regional Supplements.
☒ Review area included isolated waters with no substantial nexus to interstate (or foreign) commerce.
☒ Prior to the Jan 2001 Supreme Court decision in "*SWANCC*," the review area would have been regulated based solely on the "Migratory Bird Rule" (MBR).
☐ Waters do not meet the "Significant Nexus" standard, where such a finding is required for jurisdiction. Explain: .
☐ Other: (explain, if not covered above):.

Provide acreage estimates for non-jurisdictional waters in the review area, where the sole potential basis of jurisdiction is the MBR factors (i.e., presence of migratory birds, presence of endangered species, use of water for irrigated agriculture), using best professional judgment (check all that apply):
☐ Non-wetland waters (i.e., rivers, streams): linear feet width (ft).
☒ Lakes/ponds: 21 acres.
☐ Other non-wetland waters:.
☐ Wetlands: .

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[9] To complete the analysis refer to the key in Section III.D.6 of the Instructional Guidebook.
[10] **Prior to asserting or declining CWA jurisdiction based solely on this category, Corps Districts will elevate the action to Corps and EPA HQ for review consistent with the process described in the Corps/EPA *Memorandum Regarding CWA Act Jurisdiction Following Rapanos.***

Provide acreage estimates for non-jurisdictional waters in the review area that do not meet the "Significant Nexus" standard, where such a finding is required for jurisdiction (check all that apply):

- ☐ Non-wetland waters (i.e., rivers, streams): linear feet, width (ft).
- ☐ Lakes/ponds: acres.
- ☐ Other non-wetland waters: acres. List type of aquatic resource:.
- ☐ Wetlands: acres.

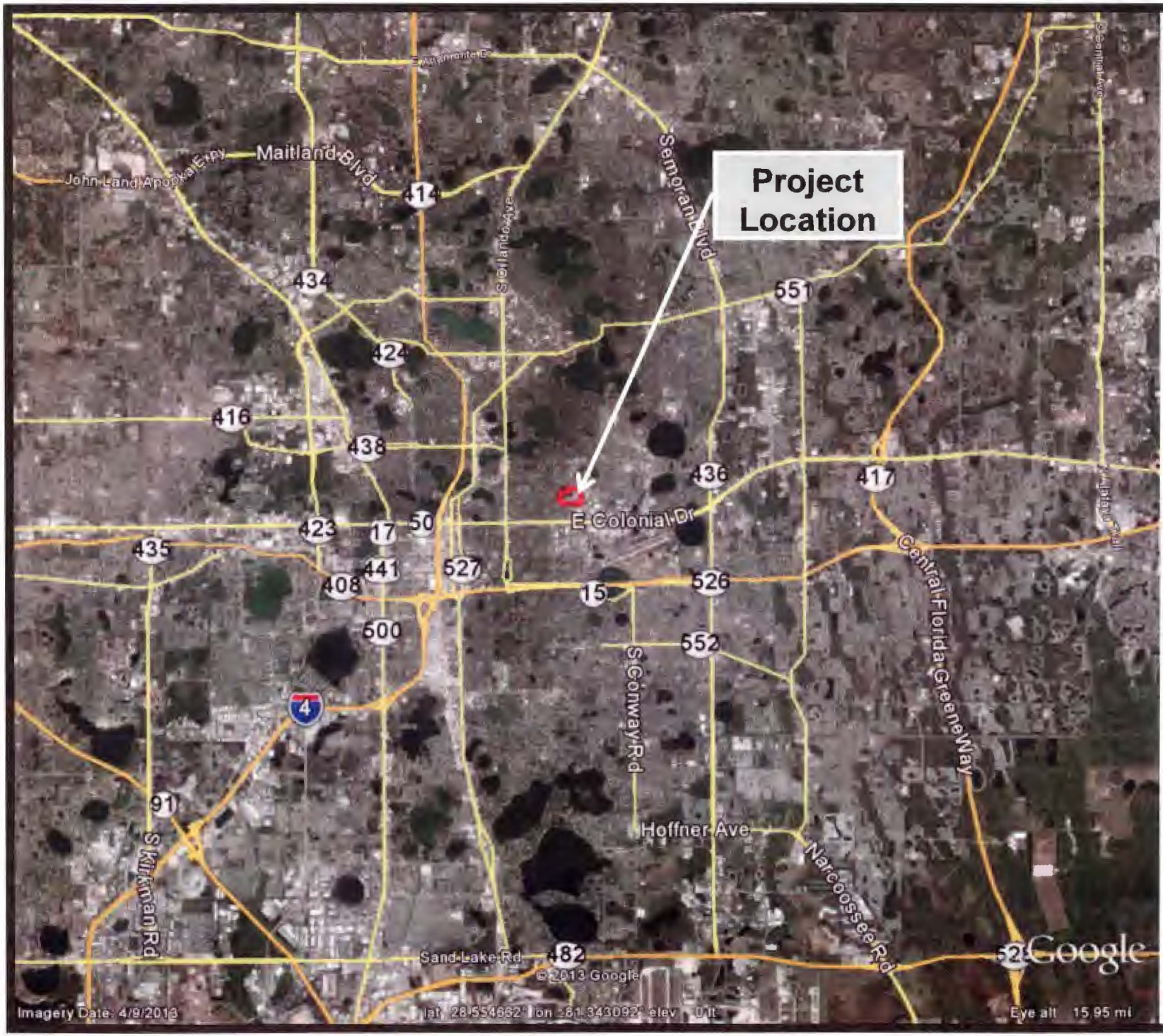
SECTION IV: DATA SOURCES.

A. SUPPORTING DATA. Data reviewed for JD (check all that apply - checked items shall be included in case file and, where checked and requested, appropriately reference sources below):

- ☒ Maps, plans, plots or plat submitted by or on behalf of the applicant/consultant: Yes
- ☒ Data sheets prepared/submitted by or on behalf of the applicant/consultant. Yes.
  - ☒ Office concurs with some of the data sheets/delineation report.
  - ☐ Office does not concur with some of data sheets/delineation report.
- ☒ Data sheets prepared by the Corps: Approved JD Form.
- ☐ Corps navigable waters' study:
- ☐ U.S. Geological Survey Hydrologic Atlas: .
  - ☒ USGS NHD data. NHD Flow Lines Figure 5
  - ☐ USGS 8 and 12 digit HUC maps.
- ☒ U.S. Geological Survey map(s). Figure ,3 Orlando East
- ☒ USDA Natural Resources Conservation Service Soil Survey. Figure 4:
- ☒ National wetlands inventory map(s). Figure 5
- ☐ State/Local wetland inventory map(s): .
- ☐ FEMA/FIRM maps: .
- ☐ 100-year Floodplain Elevation is:
- ☒ Photographs: ☒ Aerial (Name & Date):2013 (Figure 2)
  - or ☐ Other (Name & Date): .
- ☐ Previous determination(s). .
- ☐ Applicable/supporting case law: .
- ☐ Applicable/supporting scientific literature: .
- ☐ Other information (please specify):

B. ADDITIONAL COMMENTS TO SUPPORT JD:

Druid Lake is an Urban Lake that is shown on the NWI map as wetlands and not open water as indicated by the color coding. A review of aerials back to 1940 indicates Druid Lake is an open water body. There are no rivers, streams, creeks or other drainage features that flow out of the lake.



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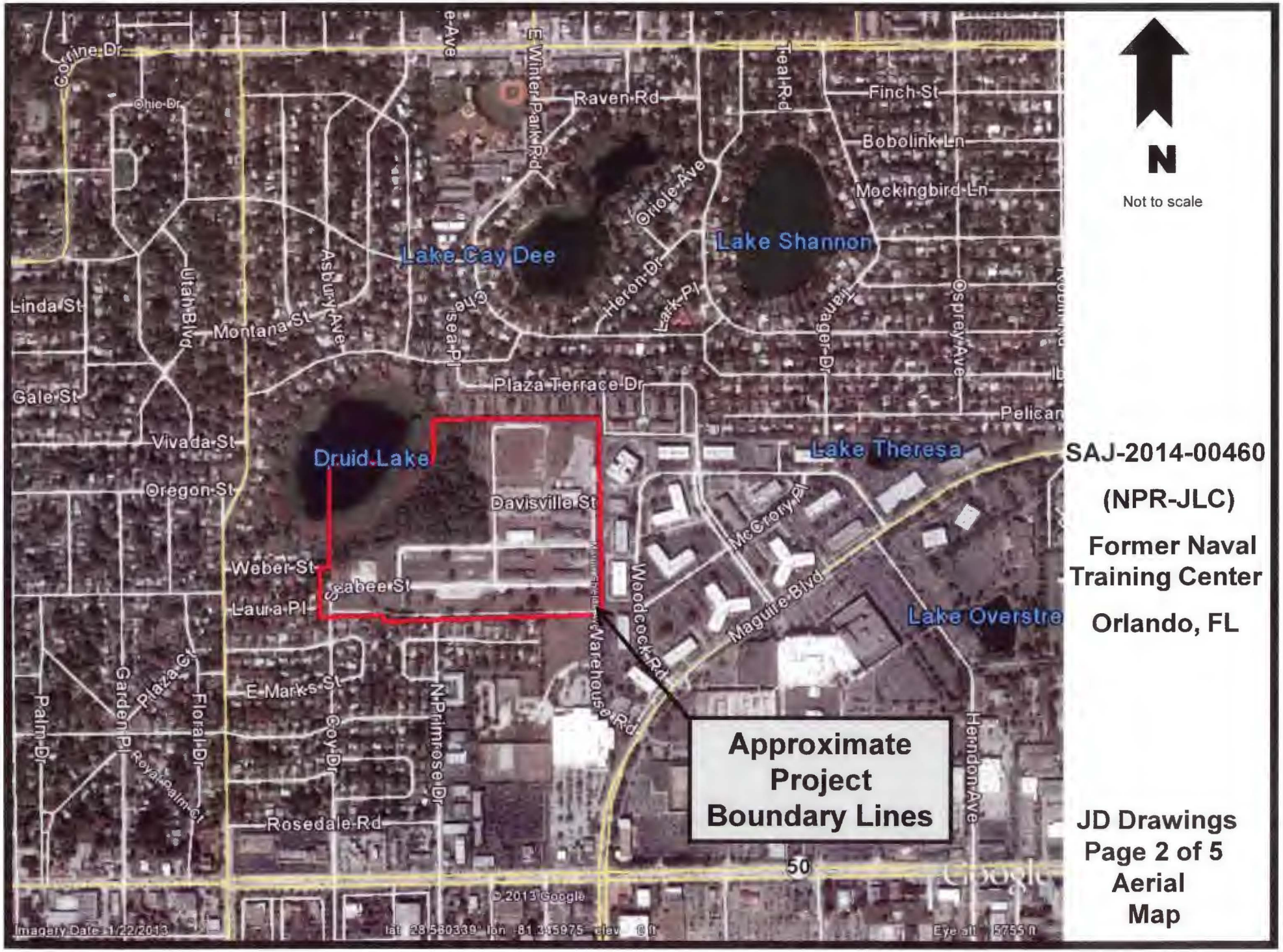
Orlando, FL

JD Drawings
Page 1 of 5
Vicinity Map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Orlando, FL
Approximate Project Boundary Lines
JD Drawings
Page 2 of 5
Aerial Map
Lake Cay Dee
Lake Shannon
Druid Lake
Lake Theresa
Lake Overstre
Raven Rd
Finch St
Bobolink Ln
Mockingbird Ln
Oriole Ave
Heron Dr
Lark Pl
Osprey Ave
Teal Rd
E Winter Park Rd
Asbury Ave
Utah Blvd
Linda St
Montana St
Gale St
Vivada St
Oregon St
Plaza Terrace Dr
Davisville St
Weber St
Laura Pl
Seabeer St
Woodcock Rd
Warehouse Rd
McCrory Pl
Maguire Blvd
Herndon Ave
Garden Pl
Plaza Ct
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E Marks St
Coy Dr
N Primrose Dr
Rosedale Rd
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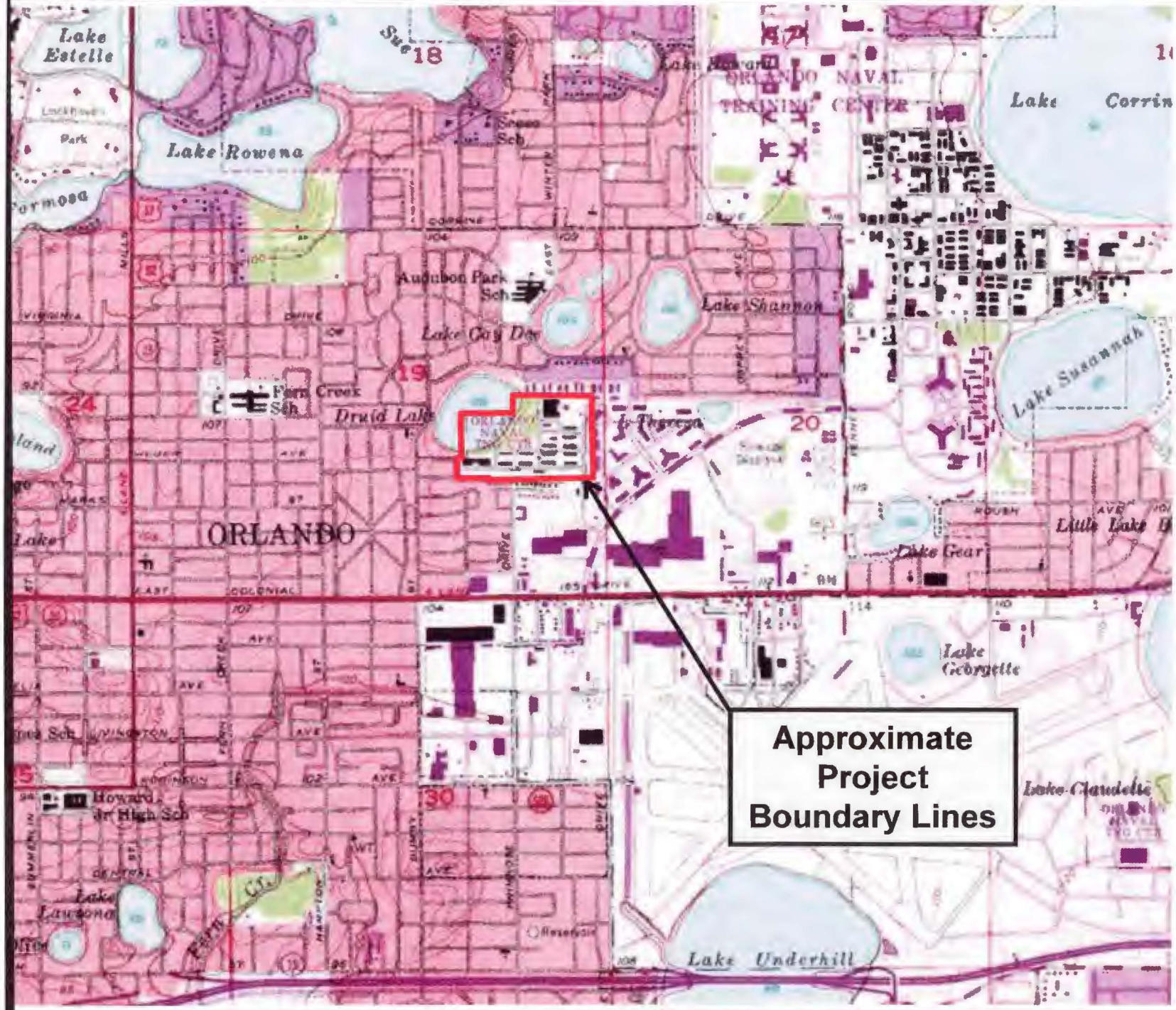
© 2013 Google
Imagery Date: 1/22/2013



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JD Drawings
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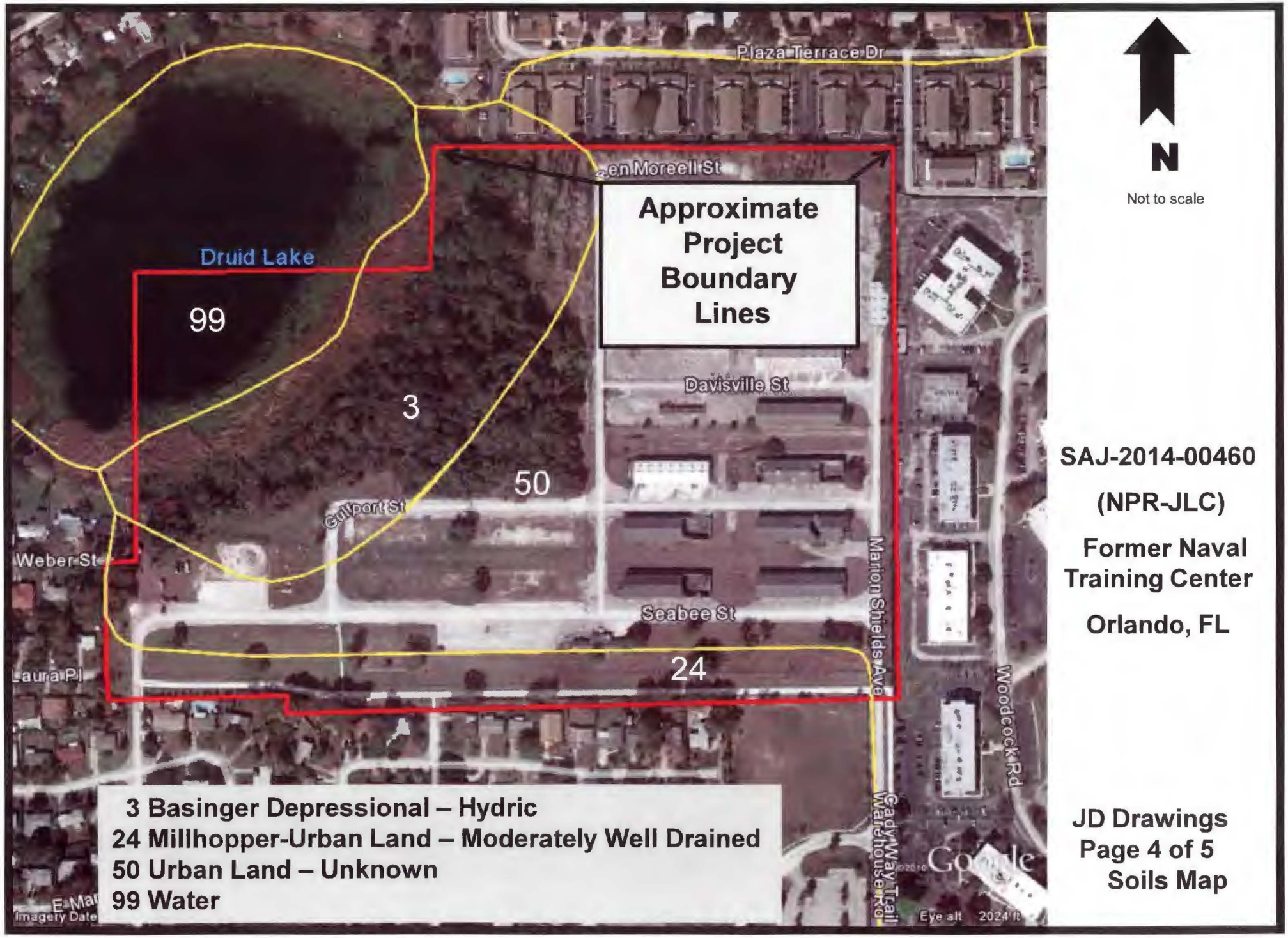
USGS
Quad Map
Orlando East


Plaza Terrace Dr
Moreell St
Approximate Project Boundary Lines
Druid Lake
99
3
50
24
Davisville St
Gulfport St
Weber St
Seabee St
Laura Pl
Marion Shields Ave
Woodcock Rd
Cady Way Trail
Warehouse Rd
Eye alt 2024 ft
3 Basinger Depressional – Hydric
24 Millhopper-Urban Land – Moderately Well Drained
50 Urban Land – Unknown
99 Water
N
Not to scale
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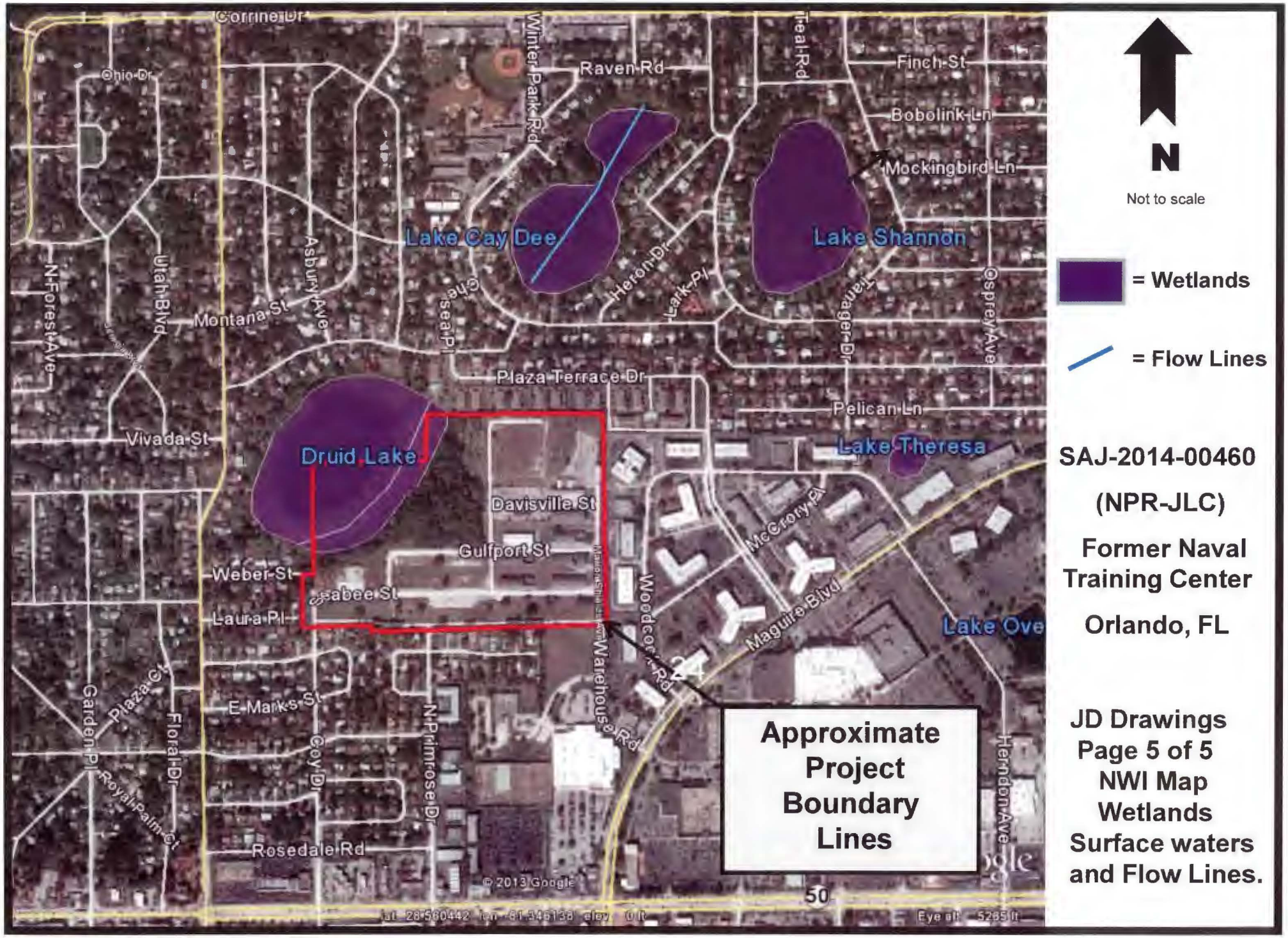
Soils Map


Corrine Dr
Ohio Dr
Winter Park Rd
Raven Rd
Teal Rd
Finch St
Bobolink Ln
Mockingbird Ln
Lake Cay Dee
Lake Shannon
Heron Dr
Lark Pl
Tanager Dr
Osprey Ave
Asbury Ave
Utah Blvd
N Forest Ave
Montana St
Plaza Terrace Dr
Pelican Ln
Lake Theresa
Vivada St
Druid Lake
Davisville St
Gulfport St
McCrory Pl
Weber St
Isabee St
Laura Pl
Warehouse Rd
Maguire Blvd
Lake Ove
Plaza Ct
Garden Pl
E Marks St
Floral Dr
Coy Dr
N Primrose Dr
Royal Palm Ct
Rosedale Rd
Herndon Ave
© 2013 Google
Approximate Project Boundary Lines
N
Not to scale
= Wetlands
= Flow Lines
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NWI Map
Wetlands
Surface waters
and Flow Lines.