

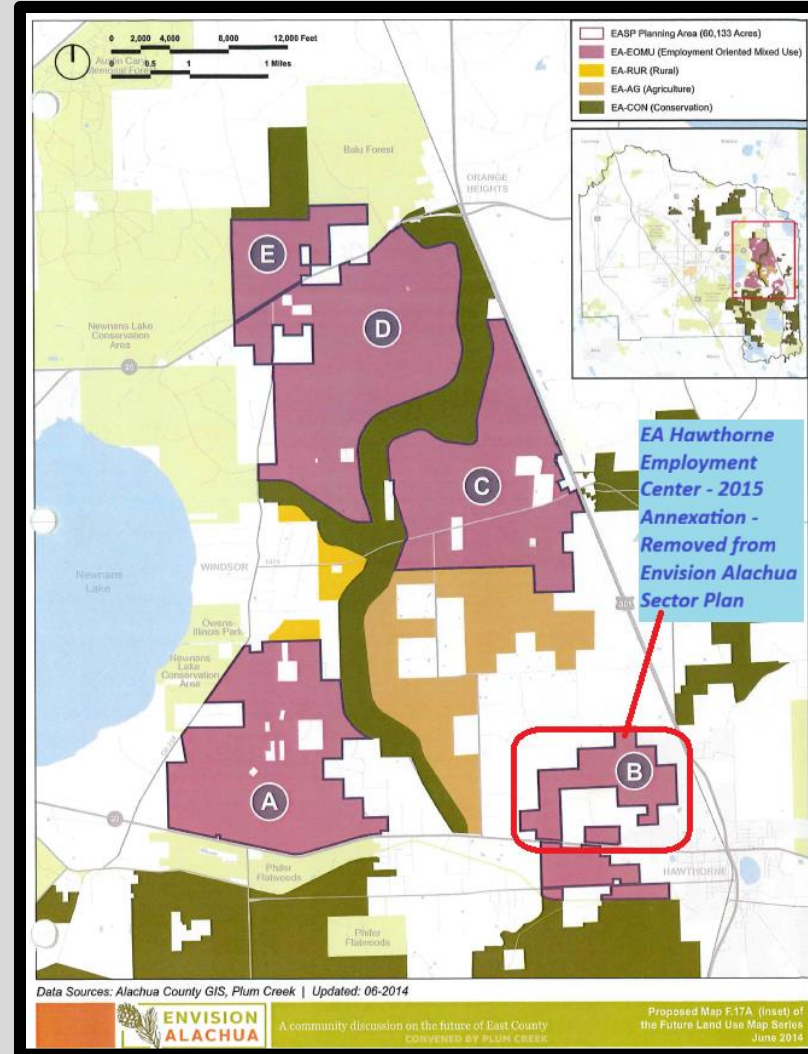
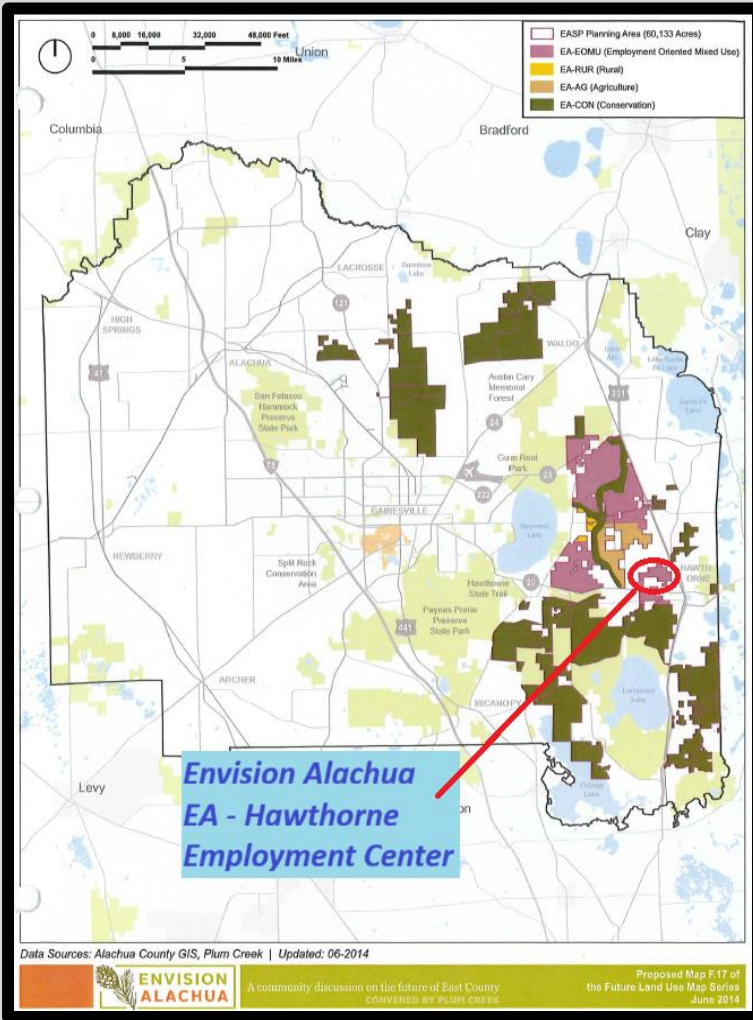


***Hawthorne Employment Center
Weyerhaeuser Company
Countywide Wetland Protection Code
Avoidance, Minimization &
Mitigation Plan***

BoCC Meeting – November 4, 2025

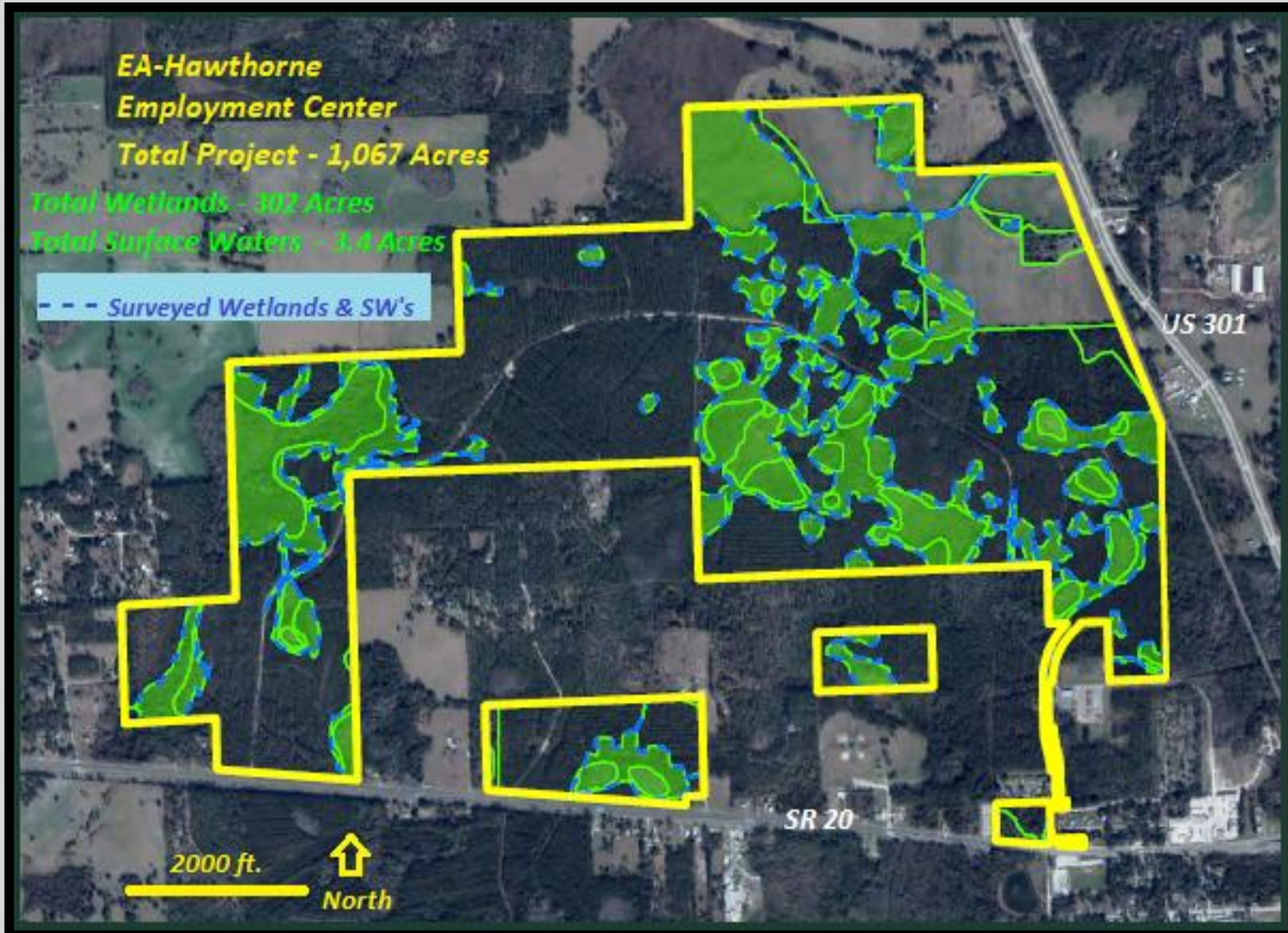
***Mark Brown
Natural Resources
Program Manager
Env. Protection Dept.***

Envision Alachua



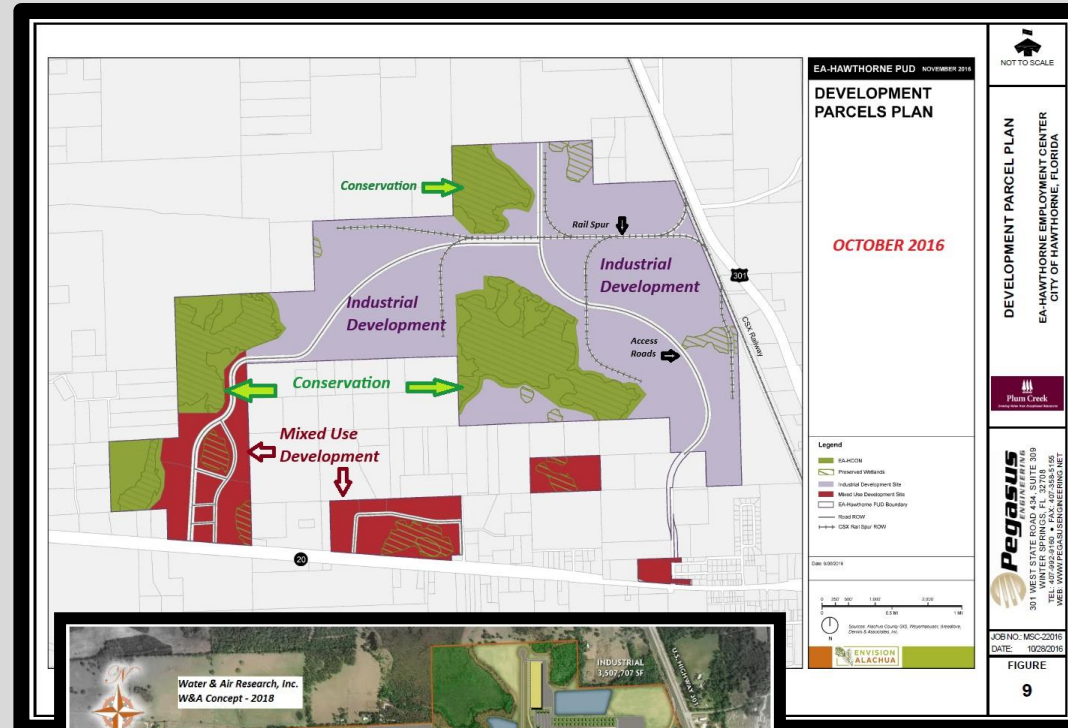
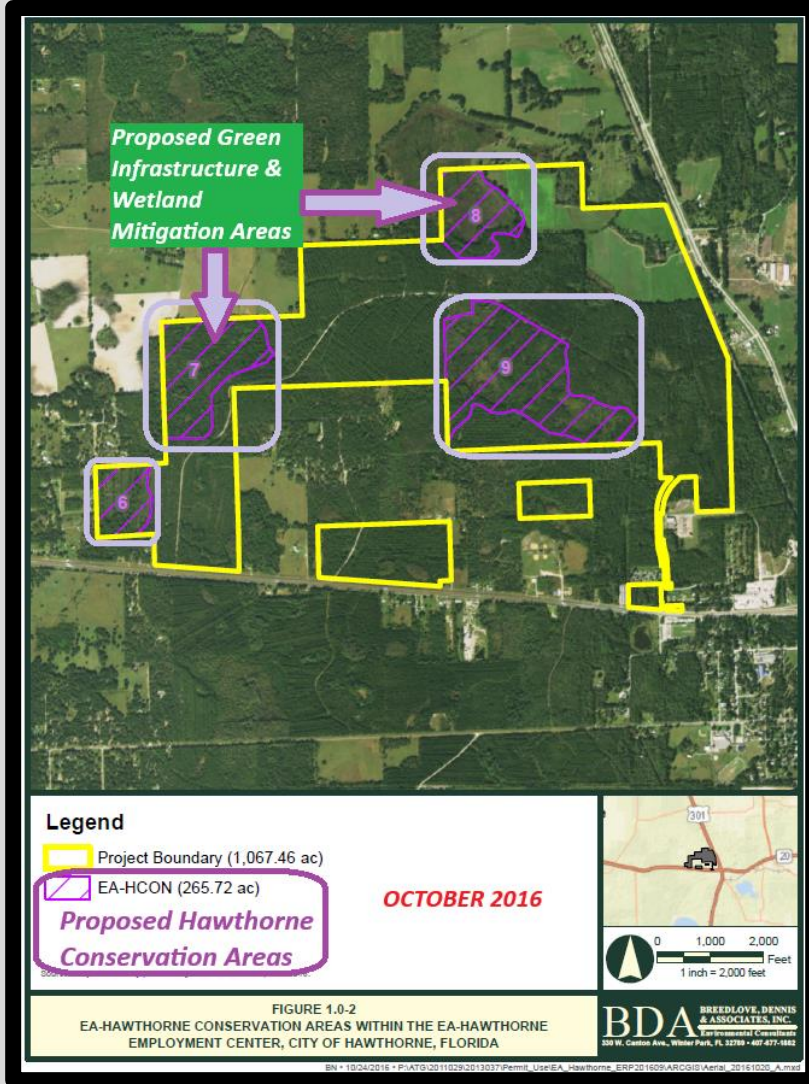
- 2011 – Plum Creek Timber Company forms “Envision Alachua Task Force.”
- 2013 – “Envision Alachua Sector Plan” (60,113 acres) submitted to Alachua County.
- 2015 – Employment Center property (1,067 acres) annexed into City of Hawthorne, removed from Sector Plan.
- 2016 – Sector Plan denied by the BoCC.

SJRWMD & USACOE PERMITTING



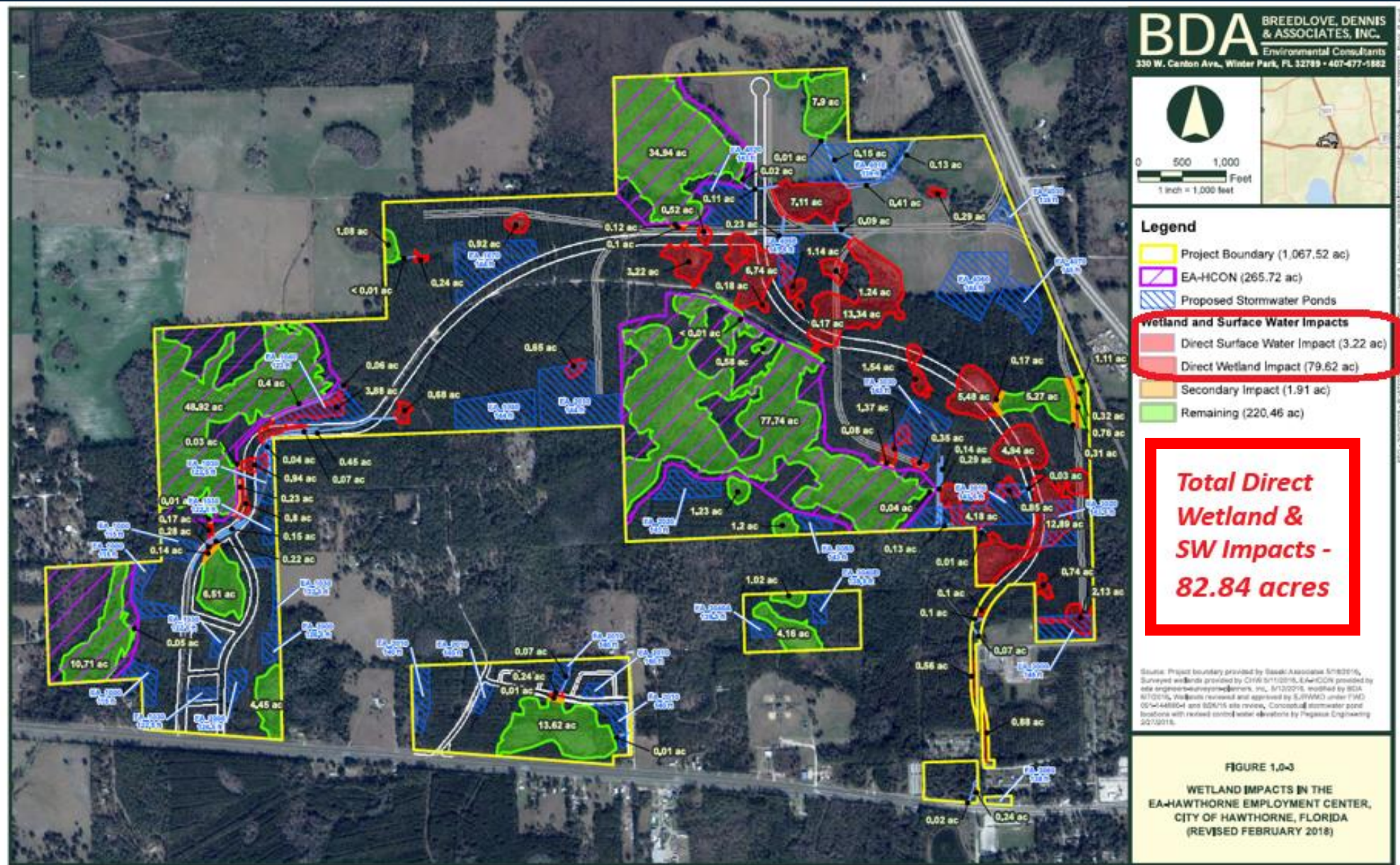
- **2015-2016 – BDA conducts Formal Wetland Delineation (FWD), verified and issued by SJRWMD.**
- **2016 - Merger of Plum Creek Timber and Weyerhaeuser NR Co.**
- **2017-2018 - Permit applications reviewed by SJRWMD & USACOE.**

SJRWMD & USACOE PERMITTING



- 2018 – Conceptual ERP issued by SJRWMD & Individual Permit issued by USACOE.
- 2023 - Conceptual ERP expired due to no Construction ERP applications submitted within five years. Requested permit extension issued by WMD.

SJRWMD - Wetland & SW Impacts



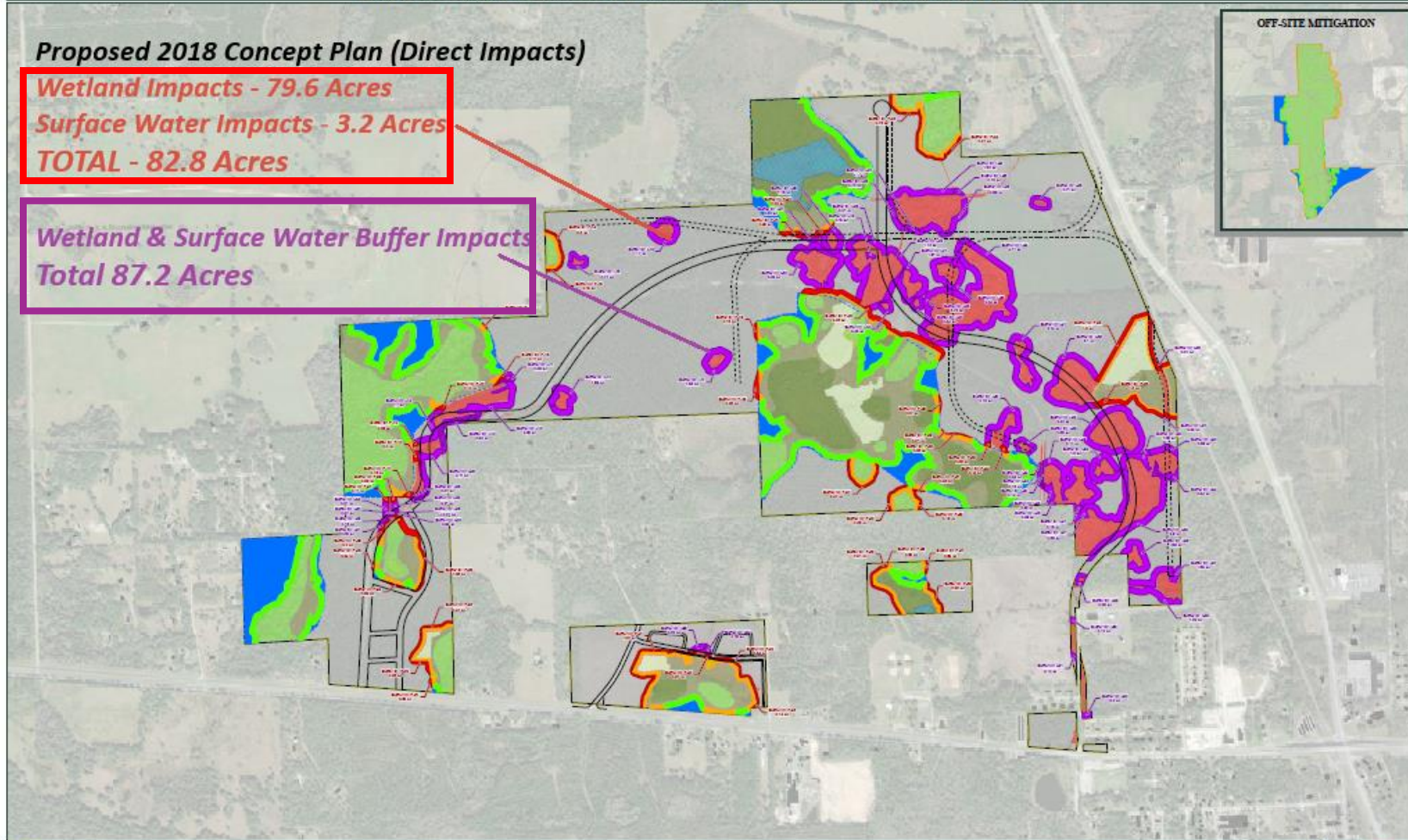
CWPC – Proposed Wetland, SW & Wetland Buffer Impacts

EXHIBIT 2. ALACHUA COUNTYWIDE WETLAND PROTECTION CODE UPLAND BUFFER ANALYSIS ON THE EA-HAWTHORNE EMPLOYMENT CENTER PROJECT SITE, ALACHUA COUNTY, FLORIDA

Proposed 2018 Concept Plan (Direct Impacts)

Wetland Impacts - 79.6 Acres
 Surface Water Impacts - 3.2 Acres
TOTAL - 82.8 Acres

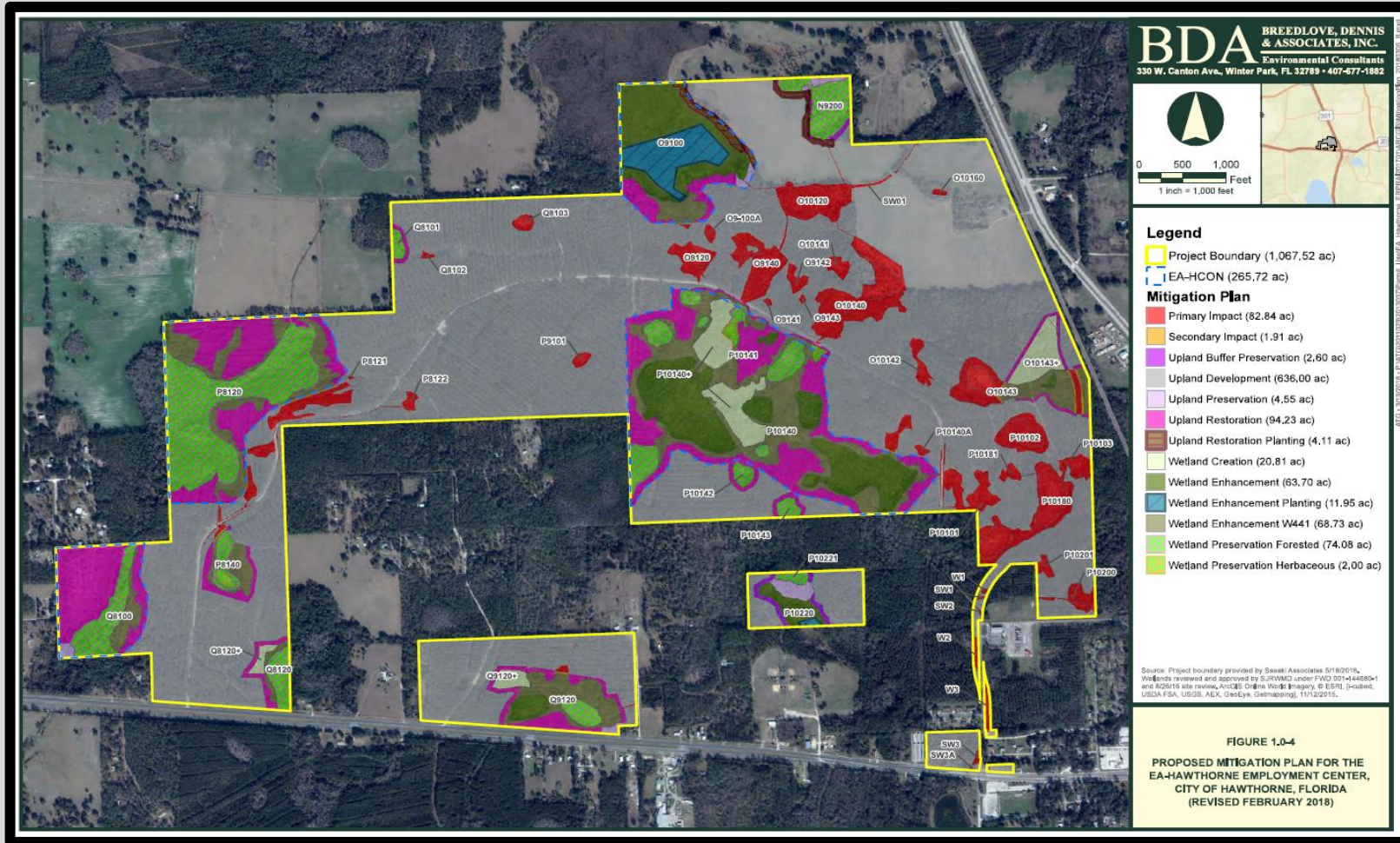
Wetland & Surface Water Buffer Impacts
Total 87.2 Acres



Legend	SJRWMD Permitted Plan	SJRWMD Permitted Offsite Mitigation Plan
CA-Hawthorne Alachua County Upland Buffer Code	Primary Impact (52.84 ac)	Upland Buffer Preservation (8.54 ac)
Road ROW	Secondary Impact (1.91 ac)	Upland Restoration (72.26 ac)
Railroad ROW	Upland Buffer Preservation (2.80 ac)	Wetland Enhancement W441 (2.16 ac)
Upland Buffer Satisfies CWPC (70.79 ac)	Upland Development (808.00 ac)	Wetland Enhancement W442 (205.10 ac)
Upland Preservation (Beyond Required CWPC Buffer) (62.18 ac)	Upland Preservation (4.55 ac)	Wetland Preservation Forested (74.06 ac)
Remaining Buffer (Does Not Satisfy CWPC) (24.40 ac)	Upland Restoration (94.23 ac)	Wetland Preservation Herbaceous (2.05 ac)
Upland Buffer Impact (15.05 ac)		
Upland Buffer Impact due to Wetland Impact (71.12 ac)		
	Upland Restoration Planting (4.11 ac)	
	Wetland Creation (20.91 ac)	
	Wetland Enhancement (83.70 ac)	
	Wetland Enhancement Planting (11.85 ac)	
	Wetland Enhancement W441 (66.73 ac)	
	Wetland Preservation Forested (74.06 ac)	
	Wetland Preservation Herbaceous (2.05 ac)	

- 2018, January – BoCC approves adoption of the CWPC.
- 2018, May – ACEPD Director submits notification letter to WMD Gov. Board, copied City of Hawthorne, Weyerhaeuser & BoCC
- 2023, July – CWPC Application with associated Avoidance, Minimization & Mitigation Plan submitted to EPD for Employment Center.

Proposed SJRWMD, USACOE & CWPC Mitigation



BDA BREEDLOVE, DENNIS & ASSOCIATES, INC.
 Environmental Consultants
 530 W. Canton Ave., Winter Park, FL 32789 • 407-677-1862

Legend

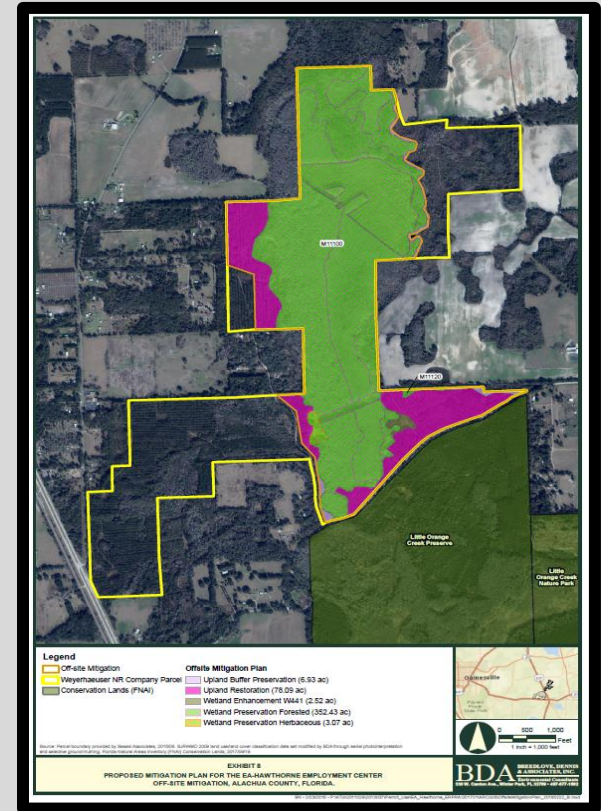
- Project Boundary (1,067.52 ac)
- EA-HCON (265.72 ac)

Mitigation Plan

- Primary Impact (82.84 ac)
- Secondary Impact (1.91 ac)
- Upland Buffer Preservation (2.60 ac)
- Upland Development (636.00 ac)
- Upland Preservation (4.55 ac)
- Upland Restoration (94.23 ac)
- Upland Restoration Planting (4.11 ac)
- Wetland Creation (20.81 ac)
- Wetland Enhancement (63.70 ac)
- Wetland Enhancement Planting (11.95 ac)
- Wetland Enhancement W441 (68.73 ac)
- Wetland Preservation Forested (74.08 ac)
- Wetland Preservation Herbaceous (2.00 ac)

Source: Project boundary provided by Sasaki Associates 5/16/2016. Wetlands reviewed and approved by SJRWMD under FWD 051444866-1 and 602915 site review, ArcGIS Online World Imagery. © ESRI, Inc., USDA FSA, USGS, ALA, GeoEye, GeoWorld, 11/20/2015.

FIGURE 1.0-4
 PROPOSED MITIGATION PLAN FOR THE
 EA-HAWTHORNE EMPLOYMENT CENTER,
 CITY OF HAWTHORNE, FLORIDA
 (REVISED FEBRUARY 2018)



Legend

- Off-site Mitigation
- Weyerhaeuser NR Company Parcel
- Conservation Lands (PMA)

Off-site Mitigation Plan

- Upland Buffer Preservation (5.93 ac)
- Upland Restoration (71.39 ac)
- Wetland Enhancement W441 (2.52 ac)
- Wetland Preservation Forested (352.43 ac)
- Wetland Preservation Herbaceous (3.27 ac)

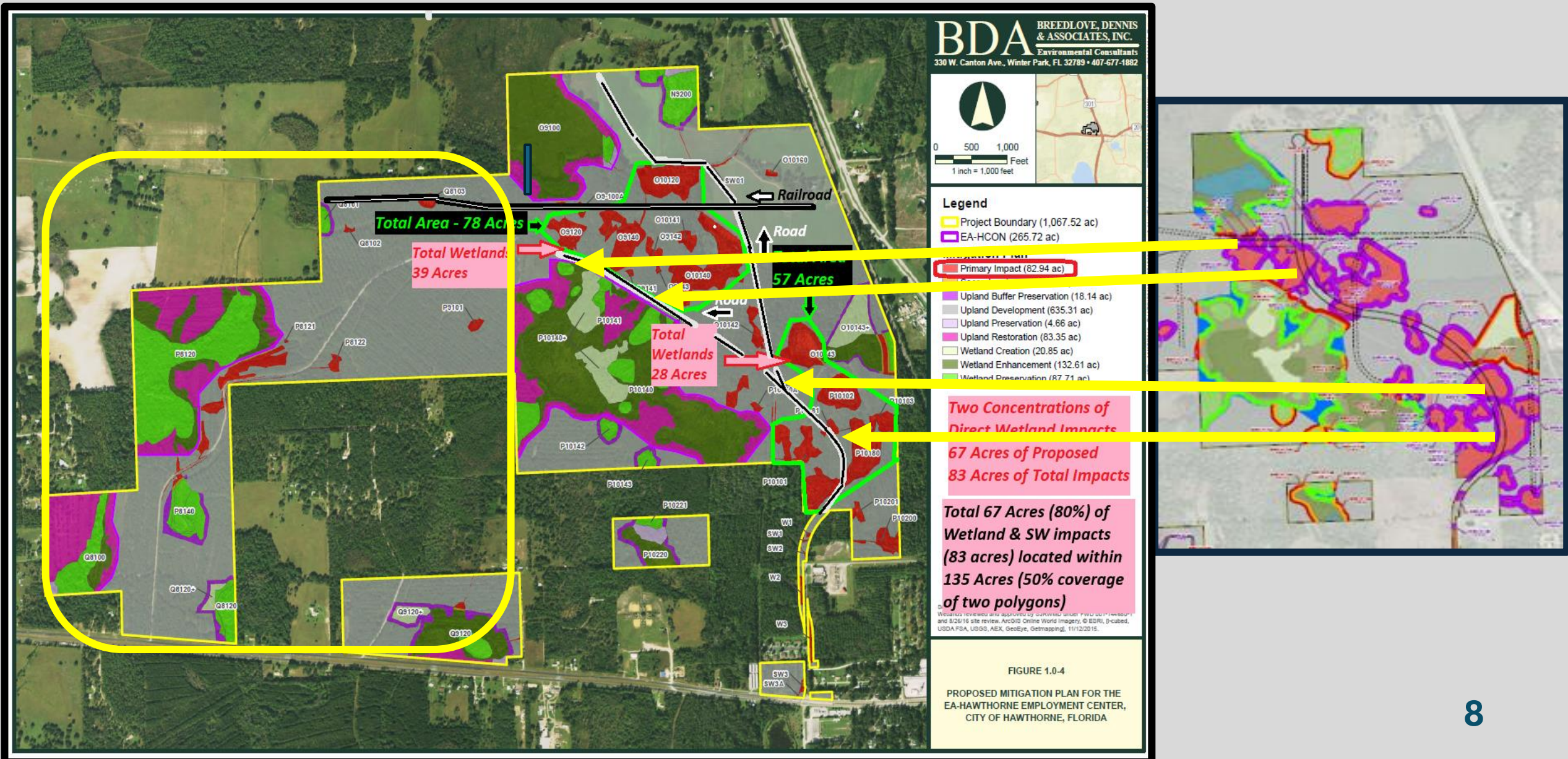
Source: Wetland boundary provided by Sasaki Associates, 5/16/2016. USACOE 2018 and USACE 2018 wetland delineation data are provided by BDA through their photo interpretation. © ESRI, Inc., USDA FSA, USGS, ALA, GeoEye, GeoWorld, 11/20/2015.

EA-Hawthorne Employment Center Proposed Wetland and Buffer Mitigation

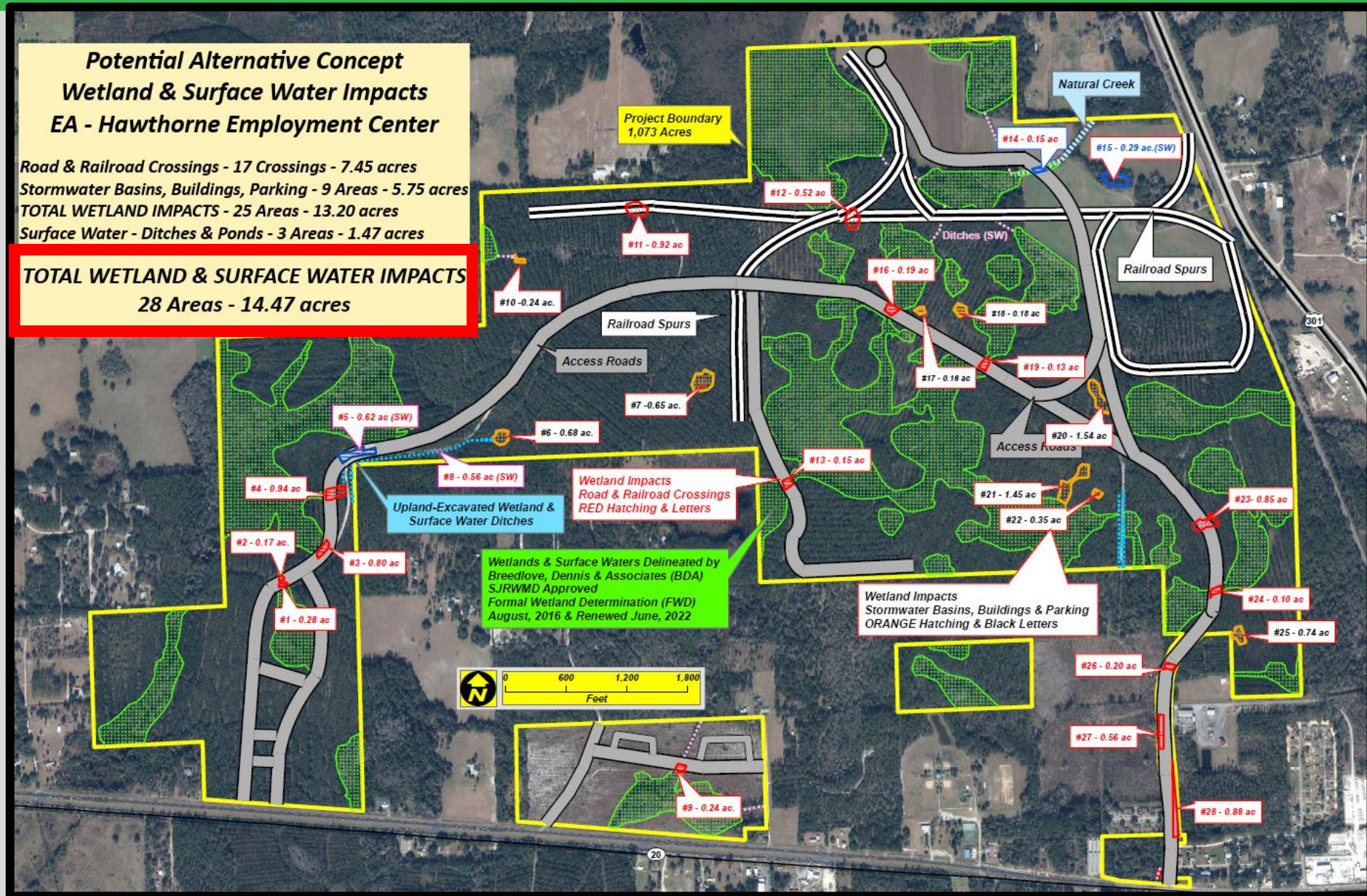
Habitat / Activity	Acreeage
Upland Preservation	23.62
Upland Restoration	248.82
Wetland Preservation	789.53
Wetland Enhancement	150.06
Wetland Creation	20.81
TOTAL	1,232.84

SJRWMD Permitted Plan		SJRWMD Permitted Offsite Mitigation Plan	
Primary Impact (82.84 ac)	Upland Restoration Planting (4.11 ac)	Upland Buffer Preservation (9.54 ac)	Upland Restoration (72.39 ac)
Secondary Impact (1.91 ac)	Wetland Creation (20.81 ac)	Upland Preservation (9.54 ac)	Upland Restoration (72.39 ac)
Upland Buffer Preservation (2.60 ac)	Wetland Enhancement (63.70 ac)	Upland Preservation (9.54 ac)	Upland Restoration (72.39 ac)
Upland Development (636.00 ac)	Wetland Enhancement Planting (11.95 ac)	Upland Preservation (9.54 ac)	Upland Restoration (72.39 ac)
Upland Preservation (4.55 ac)	Wetland Enhancement W441 (68.73 ac)	Upland Preservation (9.54 ac)	Upland Restoration (72.39 ac)
Upland Restoration (94.23 ac)	Wetland Enhancement W441 (68.73 ac)	Upland Preservation (9.54 ac)	Upland Restoration (72.39 ac)
	Wetland Enhancement Planting (11.95 ac)	Upland Preservation (9.54 ac)	Upland Restoration (72.39 ac)
	Wetland Enhancement W441 (68.73 ac)	Upland Preservation (9.54 ac)	Upland Restoration (72.39 ac)
	Wetland Preservation Forested (74.08 ac)	Upland Preservation (9.54 ac)	Upland Restoration (72.39 ac)
	Wetland Preservation Forested (74.08 ac)	Upland Preservation (9.54 ac)	Upland Restoration (72.39 ac)
	Wetland Preservation Herbaceous (2.00 ac)	Upland Preservation (9.54 ac)	Upland Restoration (72.39 ac)
	Wetland Preservation Herbaceous (2.00 ac)	Upland Preservation (9.54 ac)	Upland Restoration (72.39 ac)

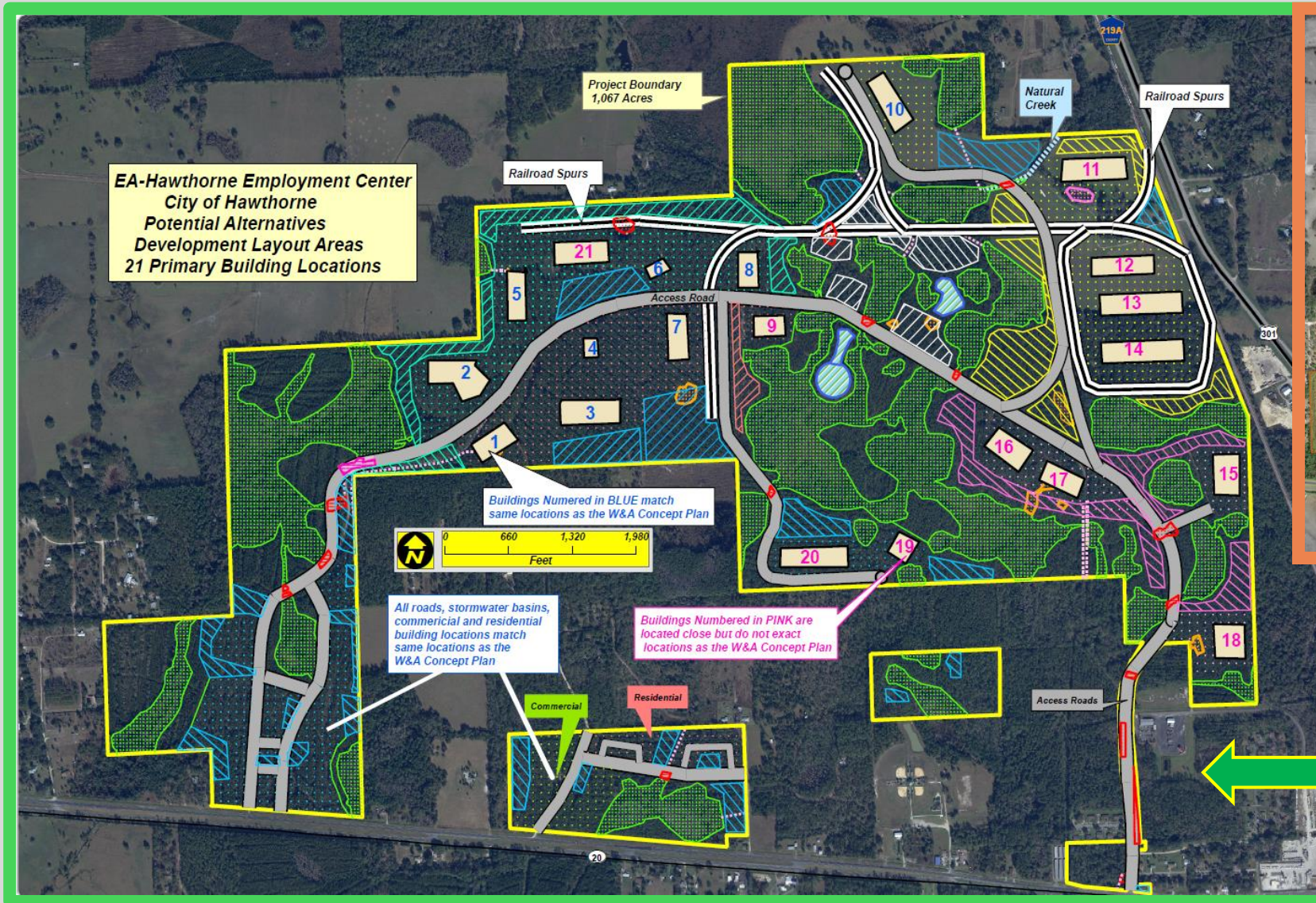
CWPC – Preliminary Site & Concept Evaluation



Alternative Concept – Stage 1 – Road & Railroad Infrastructure



Alternative Concept – Stage 3 – Building & Parking Locations

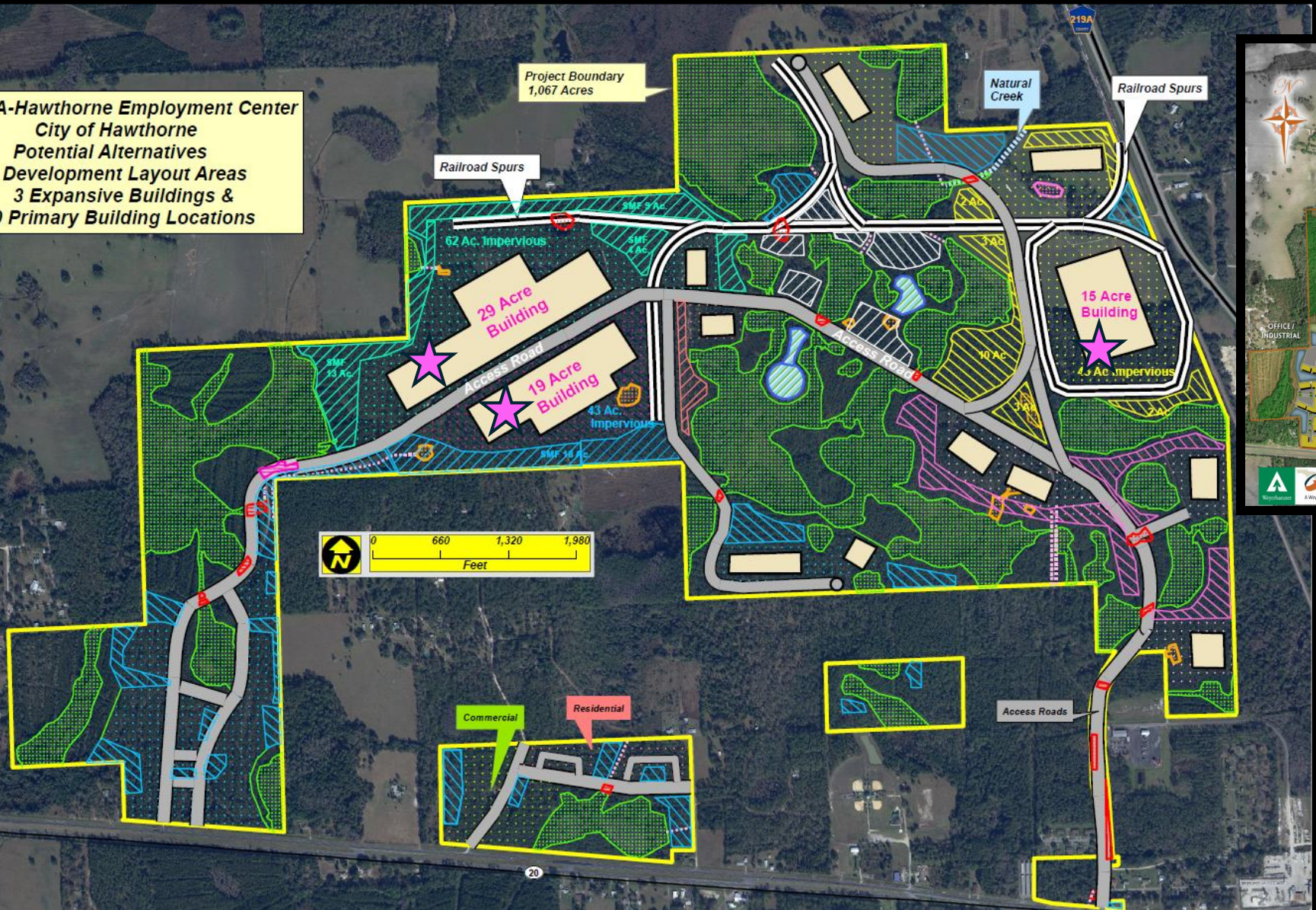


**2018 Concept Plan
21 Primary Buildings**

**Alternative Concept
21 Primary Buildings**

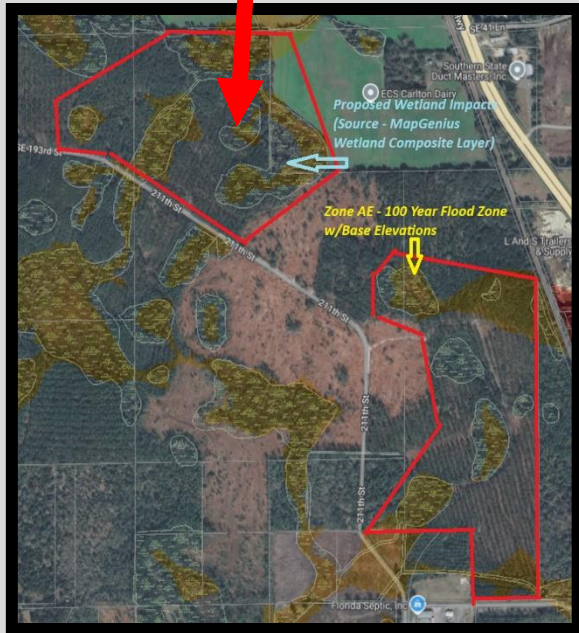
Alternative Concept – Stage 3 – Potential Building Options

EA-Hawthorne Employment Center
City of Hawthorne
Potential Alternatives
Development Layout Areas
3 Expansive Buildings &
10 Primary Building Locations



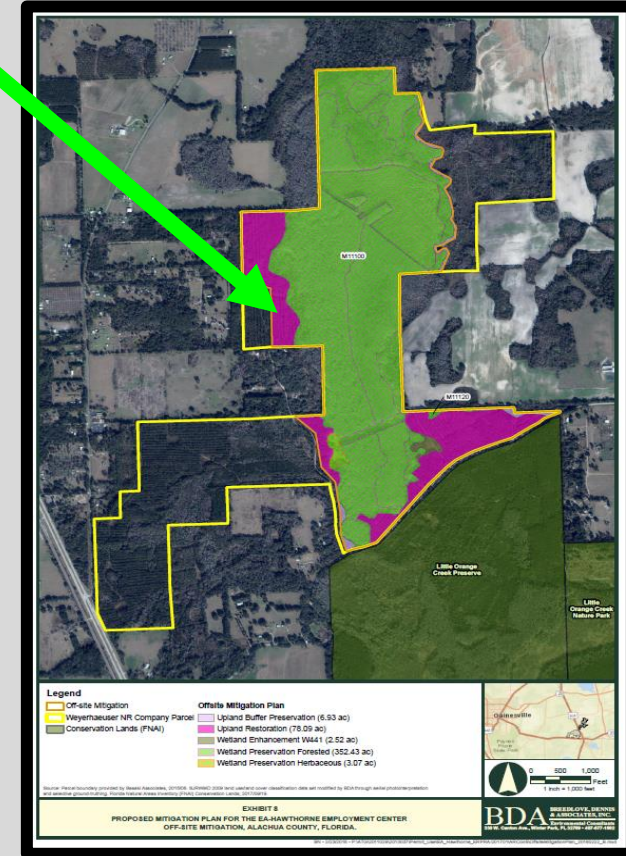
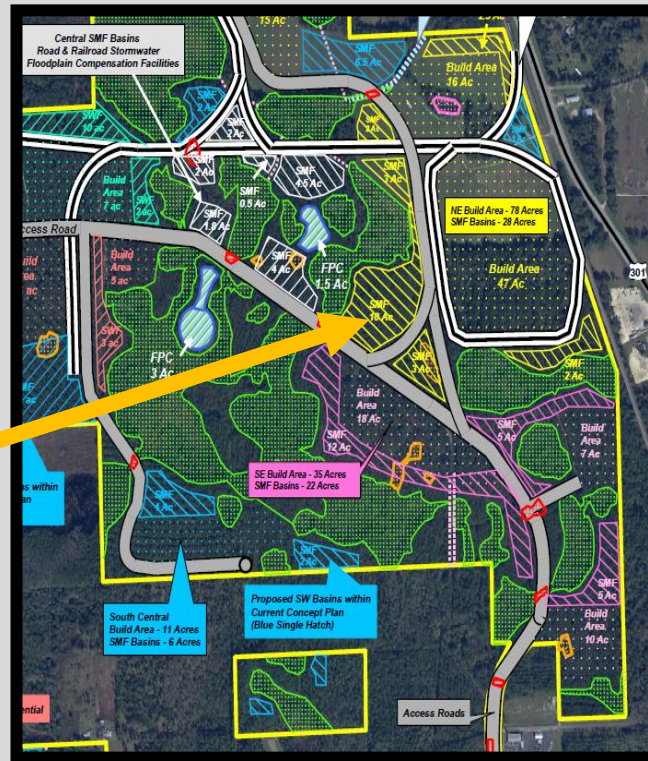
2018 Concept & Alternative Concept, Water Resources Comparison

100 Year Flood Zone



Stormwater Treatment & Attenuation

Wetland, SW & Buffer Mitigation



Article II - Countywide Wetland Protection Code

Sec. 77.20. - Authorized impacts.

The following CWPC criteria are required in the evaluation of projects proposing impacts to wetlands, surface waters, and/or wetland buffers.

(a) Alteration activities shall not be authorized in wetlands or wetland buffers except when the following criteria are met:

*(1) The applicant has taken **every reasonable step to avoid** adverse impact to the wetland and buffer; **and***

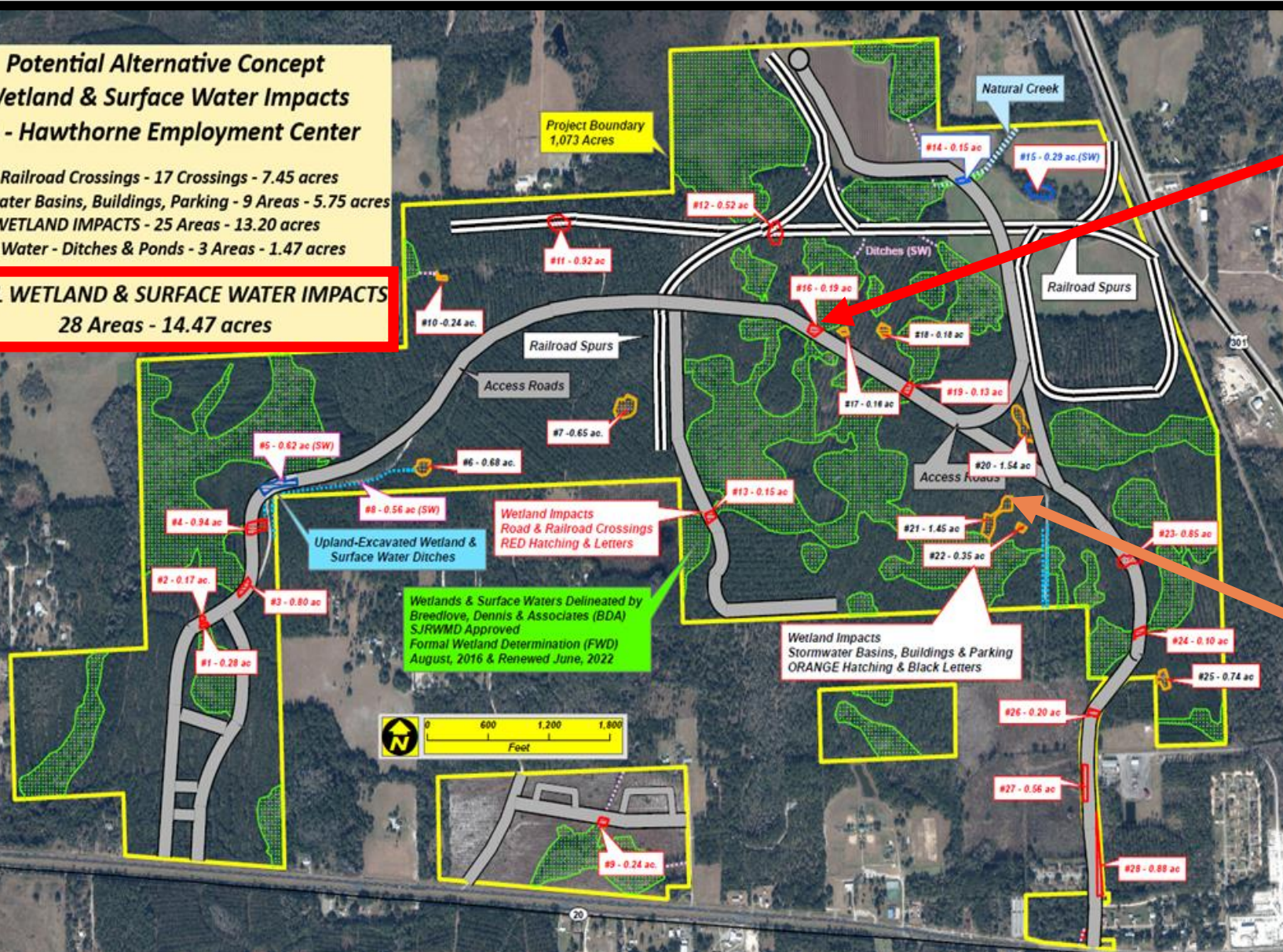
*(2) The applicant has taken **every reasonable step to minimize** adverse impact to the wetland and buffer; **and***

“Reasonable Step” - Design Options

Potential Alternative Concept Wetland & Surface Water Impacts EA - Hawthorne Employment Center

Road & Railroad Crossings - 17 Crossings - 7.45 acres
Stormwater Basins, Buildings, Parking - 9 Areas - 5.75 acres
TOTAL WETLAND IMPACTS - 25 Areas - 13.20 acres
Surface Water - Ditches & Ponds - 3 Areas - 1.47 acres

TOTAL WETLAND & SURFACE WATER IMPACTS
28 Areas - 14.47 acres



- **Narrow wetland areas necessary to construct road connection between uplands.**
- **Small wetland areas with limited options to retain ecological functions after construction.**

“Reasonable Step” – Municipalities & County Projects 2008-2025

CWPC (Municipalities) and ULDC-Section 406 (Unincorporated) Projects - Wetland and Wetland Buffer Impacts - 2018 - 2025

Project	Year	Public or Private	Municipality	Wetland Impact (Direct)	Wetland Impact (Secondary)	Wetland Buffer	Wetland Mitigation On-Site	Wetland Mitigation Bank	Buffer Mitigation On-Site	Buffer Mitigation Fee-in-Lieu
Mill Ck.W.Q. Project	2020	Public	City of Alachua	NA	NA	0.7	NA	NA	1.1	NA
SW 62nd Blvd.	2021	Public	City of Gainesville	4.5	6.8	1.1	NA	Mill Ck.	NA	Bivens Arm
GRU-Deerhaven Transmission	2022	Public	Unincorporated	0.4	7.0	1.7	NA	Blackwater	NA	ACF
Cornerstone Eastside	2023	Public	City of Gainesville	1.2	NA	1.9	NA	Mill Ck.	NA	Bivens Arm
Bickmeyer Residence	2024	Private	Unincorporated	NA	NA	0.2	NA	NA	NA	ACF
Rodriguez Residence	2025	Private	Unincorporated	0.07	0.1	0.06	NA	NA	NA	ACF
Total Acreage				6.2	13.9	5.66			1.1	

Total of 17.2 acres of direct wetland impacts between 2008-2025 (17 years) authorized by the individual City Commissions and/or Alachua County BoCC. **The Alachua County Strategic Guide, Policy 5.4.5 - target goal of less than one acre annually of wetland and surface water impacts authorized by the Board.**

“Reasonable Step” – 5% Impact Criteria

Sec. 77.20. - Authorized impacts (continued)

(c) Impact area shall not exceed the rate of one-half acre per ten acres of wetland area, including the footprint of principal and accessory structures and parking, allowing for reasonable access.

Weyerhaeuser – W&A 2018 Concept (Proposed)

Total Project Site – 1,067 acres

Total Wetlands & Surface Waters – 305 acres

Total Proposed Direct Wetlands & Surface Water Impacts – **83 acres (27%)**

Alternative Concept provided by EPD

Total Project Site – 1,067 acres

Total Wetlands & Surface Waters & Rate per 10 acres – 305 acres / 10 acres = 30.5

Total Direct Wetland & SW Water Impacts – to achieve less than 5% – 30.5 x 0.5 rate = 15.3 acres

Total Proposed Direct Wetlands & Surface Water Impacts – **15 acres (5%)**

“Reasonable Step” - Summary

Applicant ‘s Statement for Proposed Wetland Impacts – “It is important to note that the Site Plans are conceptual in nature, and development of the site will be tailored to the end user(s) needs, around the identified green infrastructure.”

EPD Staff Evaluation – There are no regulatory criteria in the wetland requirements of the Municipalities’ LDC’s, County’s ULDC-Section 406, and the CWPC that encourages, supports, justifies or authorizes conversion of avoidable regulated wetlands, surface waters and/or wetland buffers into upland areas to tailor development designs based on potential end user(s) needs.

EPD Staff Summary – Criteria (a), (1) and (2) - Since the CWPC application in 2023, EPD has not received any proposed revisions of the 2018 Conceptual Plan. Without providing evidence and appropriate documentation to demonstrate and justify on-site avoidance and minimization for the proposed wetland, surface waters and wetland buffer impacts, **staff has determined the submitted Avoidance, Minimization & Mitigation Plan doesn’t comply with the criteria required by paragraph (a), (1) and (2).**

Article II - Countywide Wetland Protection Code

Sec. 77.20. - Authorized impacts (continued)

*(3) The applicant has provided appropriate mitigation for adverse impacts to the wetland and buffer; **and***

***EPD Staff Evaluation** – Based on information provided in the CWPC application, staff agree the applicant has provided appropriate and sufficient mitigation activities to compensate for the proposed wetland, surface water and wetland buffers impacts.*

Article II - Countywide Wetland Protection Code

Sec. 77.20. - Authorized impacts (continued).

*(4) Mitigation may be permitted for new wetland loss **only** where the applicant demonstrates that the activity **cannot** practically be located on the upland portion of the parcel or contiguous parcels under common ownership or control. The applicant must demonstrate that **one** of the following applies:*

i. Minimal impact activity;

***EPD Staff Evaluation** - The provided Alternative Concept demonstrates except for approximately 7.4 acres of wetland impacts associated with road and railroad crossings, other proposed activities such as infrastructure and buildings can be located within upland areas of the project site.*

Article II - Countywide Wetland Protection Code

Sec. 77.20. - Authorized impacts (continued).

ii. *Overriding public interest; or*

***EPD Staff Evaluation** –For purposes of CWPC evaluations, overriding public interest refers to projects that are beneficial to the public as a whole. These projects are sponsored and/or primarily funded through public resources. Examples would be public schools, public roads, fire and police protection. Public interest can also apply to activities that provide environmental benefits for the public. As examples, protection of wetlands and buffers provide critical flood protection, water quality treatment and groundwater recharge to benefit the public as a whole.*

Article II - Countywide Wetland Protection Code

Sec. 77.20. - Authorized impacts (continued).

iii. All economically viable use of the property is otherwise precluded;

EPD Staff Evaluation –The provided Alternative Concept demonstrates that if even partially incorporated, similar quantity, locations and size of buildings and infrastructure submitted with the 2018 Concept Plan could be constructed on the project site with substantially less wetland and buffer impacts.

*EPD Staff Summary for Criteria (4), i, ii, iii – The Alternative Concept evaluated and prepared by EPD staff demonstrates incorporating minor design revisions into the submitted 2018 Concept Plan can result in avoidance and minimization of proposed wetland, surface water and buffer impacts. **Therefore, staff has determined that the submitted CWPC application doesn't comply with any of the criteria required by paragraph (4) i, ii or iii.***

Article II - Countywide Wetland Protection Code

EPD Staff - Conclusion - staff does not agree the submitted AM&M Plan with proposed 83 acres of wetland/surface waters and 87 acres of wetland buffer impacts successfully demonstrate achieving the CWPC criteria. Staff evaluated, prepared and provided potential alternatives; recognizing the challenges of the site conditions and goals to benefit the current and future citizens of Hawthorne. As a result, EPD staff can support and recommend BoCC approval of the AM&M Plan **with limitations**. These limitations would be successfully demonstrated by incorporating design revision to **decrease direct wetland and surface water impacts to not exceed a total of 15 acres (5% of total wetlands on the project site); primarily associated with the impacts depicted within the provided Alternative Concept.**