Exhibit P

March 8, 2021, Wetlands/Transition Area Investigation from Environmental Technology, Inc

ENVIRONMENTAL TECHNOLOGY INC.

Environmental Consultants

CELEBRATING 30 YEARS IN BUSINESS

March 8, 2021

SENT VIA EMAIL: mike@rothengineers.com

Mr. Michael J. Roth, P.E., P.P.
Roth Engineering, LLC
10 Main Street
Chester, NJ 07930

Re: Wetlands/Transition Area Investigation
32 Ironia Road
Block 109, Lot 23
Township of Mendham, Morris County, N.J.

Dear Michael:

Per your request, Environmental Technology Inc. (ETI) has visited the above referenced property to determine if the proposed project is impacted by any wetlands or wetland transition areas. The plan reviewed was prepared by your office, entitled "Preliminary & Final Major Site Plans for Proposed Farm Based Brewery at Backer Farm, Grading, Utility and Soil Erosion & Sediment Control Plan, Block 109, Lot 23, Township of Mendham, Morris County, New Jersey," dated March 8, 2021. This review was pursuant to the Freshwater Wetlands Protection Act Rules (N.J.A.C. 7:7A). Our methodology and findings are as follows:

STUDY METHODOLOGY

The investigation of the site was performed by David C. Krueger of Environmental Technology, Inc. on October 28, 2020.

In accordance with the New Jersey Freshwater Wetlands Protection Act, and outlined by the New Jersey Department of Environmental Protection (NJDEP), the extent of the wetlands were determined by implementing the methodology that is currently accepted by the United States Environmental Protection Agency (USEPA), namely Federal Manual for Identifying and Delineating Jurisdictional Wetlands dated January 10, 1989 and supplements. This methodology states that for an area to be considered wetland all three of the following parameters must be present:

1. Hydric Soils

2. A Predominance of Hydrophytic Vegetation

3. Hydrology

The determination of hydric soils in the field is made by the use of a manually operated soil sampler. Then a determination of hydric soils is made by using Munsell Soil Color Charts. Transects are made from the wetlands to the uplands to determine the point at which soils no longer were determined to be hydric. Hydric soils are those soils that have a chroma of less than or equal to 1 (when no mottling is present) or a matrix chroma of less than or equal to 2 when mottling is present.

When soils classified as a sand soil are encountered Munsell Soil Color Charts are not used exclusively. In these instances hydric determinations are also made by the presence of one or more of the following conditions: high organic matter content in the surface horizon, the streaking of subsurface horizons by organic matter, or the presence of organic pans.

In situations in which soils exhibit significant coloration due to the nature of the parent material (e.g. red shales) the soils often do not exhibit the characteristic chromas associated with hydric soils. In the above situations the Munsell Soil Color Charts cannot always be used to evaluate the hydric nature of the soil. In these cases their hydric nature according to the Soil Conservation Service (SCS), and the other criteria carry more weight.

Vegetation is classified according to the Eastern Mountains and Piedmont 2014 Regional Wetland Plant List prepared by the USACOE. The classifications, according to this list are as follows:

Obligate (OBL) Always found in wetlands under natural (not planted) conditions (frequency greater than 99%), but may persist in nonwetlands if planted there by man or in wetlands that have been drained, filled, or otherwise transformed into nonwetlands.

Facultative Wetland (FACW) Usually found in wetlands (67%-99% frequency), but occasionally found in nonwetlands.

Facultative (FAC) Sometimes found in wetlands (34%-66% frequency), but also occurs in nonwetlands.

Facultative Upland (FACU) Seldom found in wetlands (1%-33% frequency) and usually occurs in nonwetlands.

Nonwetland (UPL) Occurs in wetlands in another region, but not found (<1% frequency) in wetlands in the region specified. If a species does not occur in wetlands in any region, it is not on the list.

According to the Federal Manual for Identifying and Delineating Jurisdictional Wetlands dated January 10, 1989, an area has hydrophytic vegetation, when under normal circumstances more than 50 percent of the composition of the dominant species from all strata are obligate wetland (OBL), facultative wetland (FACW), and/or facultative (FAC) species. However, when a plant community has less than or equal to 50 percent of the dominant species from all strata represented by OBL, FACW, and/or FAC species, and hydric soils and wetland hydrology are present, the area

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also has hydrophytic vegetation. (NOTE: These areas are considered problem area wetlands.)

In the non-growing season hydrophytic vegetation is assumed to be present, since during this time of the year many herbaceous species are either unidentifiable or non-existent.

Hydrology is determined by the evidence of water, either visible or indicators that water was present. This is noted by visible factors such as drift lines, high water marks on trees, sediment deposits including encrusted detritus, displacement of leaf litter as the result of water flowage, and drainage patterns. During the growing season, saturated soil samples and/or the water table is noted as evidence of hydrology when they are encountered within 12 inches of the soil surface.

Seasonal high-water table information is used, when available, from the Soil Conservation Service. Recent rainfall and/or other precipitation is also considered when evaluating hydrology.

In situations where the native conditions have been altered such as; cleared lands (e.g. agricultural lands), areas where the original soil has been altered (such as formerly plowed or filled lands), certain criteria are given more weight than others due to the lack of reliability of the affected parameter as an indicator.

FINDINGS

The investigation found the property to be developed as a farm with barns, paddocks, livestock areas, residential structure and other appurtenant structures. The undeveloped portions of the site are a combination of hayfields and wooded areas in the western section along the stream corridor.

No freshwater wetlands were identified within 150 feet of the proposed improvements. The maximum wetlands transition area is 150 feet; therefore, the proposed project is not within a wetland, State open water or wetland transition area.

Soil samples on the site were non-hydric, with Munsell Soil Color Chart Readings of 10YR 4/4 from 0 to 8 inches and 10YR 5/4 from 8 to 18 inches.

The proposed project area in general consisted of maintained farming areas and hayfields.

CONCLUSIONS

Based on the methodology currently accepted by the NJDEP pursuant to N.J.A.C. 7:7A, the proposed project is not within a wetland transition area or wetland.

The information provided is based on the most current information available and our best professional judgment. This letter does not consider pending or future legislation or regulations that may change the opinions provided.

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Mr. Michael J. Roth

March 8, 2021

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Please do not hesitate to contact our office if you should have any questions regarding our findings.

Very truly,

ENVIRONMENTAL TECHNOLOGY INC.

David C. Krueger, President
Professional Wetland Scientist 000662
Certified Wetland Delineator WDCP94MD03101146B

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