UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

FEB 21 2012

Colonel Alfred A. Pantano Jr.
District Engineer
Jacksonville District, Corps of Engineers
Attn: Tracy Hurst
U.S. Army Corps of Engineers
10117 Princess Palm Avenue, Suite 120
Tampa, Florida 33610

Subject: Supplemental Comments on Ridge Road Extension, Public Notice SAJ-2011-00551
Pasco County Board of Commissioners and Florida Turnpike Enterprise, Applicants

Dear Colonel Pantano:

This letter follows our most recent comment letter, dated January 27, 2012, from the U.S. Environmental Protection Agency regarding the subject public notice by the U.S. Army Corps of Engineers, for the proposed Ridge Road Extension project in central Pasco County, Florida. The proposed Ridge Road Extension project is a divided roadway extending 7.7 miles in an east-west direction, to connect Moon Lake Road at the western end, with Suncoast Parkway in the approximate middle, and U.S. Hwy. 41 at the eastern terminus.

This letter summarizes the EPA's position on this proposed project, concentrating specifically on the Clean Water Act (CWA) Section 404 (b)(1) Guidelines (Guidelines) and the implementing regulations at 40 CFR Part 230. The purpose of the Guidelines is to restore and maintain the chemical, physical and biological integrity of waters of the United States. These goals are achieved, in part, by prohibiting discharges of dredged or fill material that would result in avoidable or significant adverse impacts on the aquatic environment. The burden to demonstrate compliance with the Guidelines rests with the permit applicant.

In our comment letter of January 27, 2012, we described our concerns with the proposed project, particularly about the need for: (1) an updated jurisdictional determination, (2) an appropriate alternatives analysis to enable the Corps to determine the Least Environmentally Damaging Project Alternative (LEDPA), and (3) traffic modeling for different alternative roadway alignments and widenings that would aid in the analysis for the LEDPA determination. Our prior comments also noted that the land preservation actions proposed by the applicants as compensatory wetland mitigation would be premature and inappropriately speculative for the EPA to review at this time, because wetland impact avoidance and minimization have not been adequately demonstrated and a LEDPA has not yet been selected.

The proposed roadway and its highway interchanges would directly and adversely impact more than 59 acres of wetlands, comprised mostly as cypress-dominated and bottomland hardwood swamps, wet prairie, wetland scrub and other shrub-dominated native wetland plant communities. Five stream

crossings at the headwaters and tributaries of Pithlachascotee River and Anclote River also would be impacted. The EPA considers these wetland areas within the project site to exhibit high quality ecological functions, based upon their intact native plant communities, lack of any substantial invasive vegetation, relatively large stands of mature cypress (*Taxodium distichum*) trees in wetlands scattered throughout the site, and field indicators of seasonally fluctuating water levels and a natural wetland hydroperiod.

The western segment of the proposed Ridge Road Extension corridor bisects the Serenova Tract property (6,533 acres) that is a northern addition to the larger Starkey Wilderness Preserve (18,000 acres), owned and managed by Southwest Florida Water Management District. The Serenova Tract also features a wellfield that contributes to the regional water supply system of Tampa Bay Water Agency. The EPA conducted wetland field inspections of the Serenova Tract property on two separate site visits in July and September 2011.

The EPA considers wetlands of the Starkey Wilderness Preserve and the upper Pithlachascotee River and Anclote River watersheds to be Aquatic Resources of National Importance (ARNI), because of their existing and intact wetland functions, including wildlife habitat, floodwater storage, groundwater recharge and water quality enhancements for the nearby downstream estuaries along the Gulf of Mexico.

Based on the above observations and our most recent comment letter, the EPA has determined that the project, as currently proposed, does not comply with the Guidelines and will have substantial and unacceptable adverse impacts on an ARNI. Therefore, we recommend denial of the project, as currently proposed. This letter follows the field-level procedures outlined in the August 1992 Memorandum of Agreement between the EPA and the Department of the Army, Part IV, paragraph 3(b) regarding Section 404(q) of the CWA.

Thank you for the opportunity to comment on the subject public notice. If you have any questions, please contact the Project Manager, David Pritchett, at telephone (404) 562-8004 or email pritchett.davida@epa.gov.

Sincerely,

Gwendolyn Keyes Fleming
Regional Administrator