



DEPARTMENT OF THE ARMY
JACKSONVILLE DISTRICT CORPS OF ENGINEERS
10117 PRINCESS PALM AVENUE, SUITE 120
TAMPA, FLORIDA 33610

March 4, 2013

REPLY TO
ATTENTION OF

Tampa Permits Section
SAJ-2011-00551 (IP-TEH)

Ms. Michele Baker
Pasco County Board of County Commissioners
7530 Little Road, Suite 320
New Port Richey, Florida 34654

Mr. John Post, Jr.
Florida Department of Transportation
Florida's Turnpike Enterprise
Post Office Box 613069
Ocoee, Florida 34761

Dear Ms. Baker and Mr. Post:

This is in reference to your permit application requesting authorization from the U.S. Army Corps of Engineers (Corps) to impact waters of the United States in association with a project known as "Ridge Road Extension" (SAJ-2011-00551 (IP-TEH)).

The Corps is in receipt of your February 13, 2013 letter, which contains your justification for the request to extend the time to submit a full response to the Corps's Request for Additional Information (RAI) dated July 23, 2012 and subsequent RAIs. Per your request, the Corps is extending the time to complete a full response to September 30, 2013.

The Corps independently defines the project purpose for both National Environmental Policy Act (NEPA) and Clean Water Act (CWA) purposes with input from the Applicant, the public, and other agencies. NEPA requires an examination of all reasonable alternatives to be considered during an agency's analysis of a project. Reasonable alternatives are those that are practicable or feasible from a technical and economic standpoint, not those that are simply desirable from the standpoint of an Applicant. For the reasons stated above and in our previous correspondence, the Corps has defined the project purpose as follows:

To improve east-west roadway capacity and enhance overall mobility within the area bounded by SR-52 to the north, SR-54 to the south, US-41 to the east, and Moon Lake Road / DeCubellis Road / Starkey Boulevard to the west in accordance with the County's current Comprehensive Plan and the Metropolitan Planning Organization's Long Range Transportation Plan. The project will also provide additional roadway capacity and improved routing away from coastal hazard areas and improve hurricane evacuation clearance times in the event of a hurricane or other major weather-related occurrence in accordance with State of Florida requirements and the County's current Comprehensive Plan.

The CWA 404(b)(1) Guidelines (Guidelines) state that an alternative is practicable if it is available and capable of being done after taking into consideration cost, existing technology and logistics in light of overall project purposes. Pursuant to the Guidelines, when the proposed activity does not require access or proximity to or siting within a special aquatic site (i.e., wetlands), the Corps presumes that practicable alternatives that do not involve special aquatic sites are available unless the applicant clearly demonstrates otherwise (40 C.F.R. 230.10(a)(3)). Furthermore, the Corps presumes that all practicable alternatives that do not involve a discharge into a special aquatic site have less adverse impacts on the aquatic ecosystem unless the applicant clearly demonstrates otherwise.

In your letter you provided a "Screening for Project Purpose and Practicability" that is proposed to be used to screen out alternatives. The Corps requests that you do not use this screening process and instead apply the 404(b)(1) Guidelines to determine which alternatives are practicable. If you determine, in accordance with the 404(b)(1) Guidelines, that an alternative is not practicable, please explain the rationale for that determination and supply supporting information so that the Corps can evaluate your determination. Please use the project purpose as described above for this analysis.

Should you have any questions or comments regarding this letter, please contact Tracy Hurst of my staff at the letterhead address, by phone at 813-769-7063, or by electronic mail at Tracy.E.Hurst@usace.army.mil.

Sincerely,



Kevin D. O'Kane
Chief, Tampa Permits Section