

**Appendix B**  
**Agency Coordination Letters**

**List of Agencies Contacted**

Jay Slack, Field Supervisor  
USFWS  
South Florida Ecological Services Office  
1339 20<sup>th</sup> Street  
Vero Beach, FL 32960  
cc: Phil Frank, Biologist  
U.S. Fish and Wildlife Service  
Winn-Dixie Plaza  
Big Pine Key, FL 33043

Georgia Cranmore, Acting Assistant  
Regional Administrator  
NMFS, Southeast Region  
Protective Resources Division  
9721 Executive Center Drive North  
St. Petersburg, FL 33702

Jocelyn Karazsia, Fishery Biologist  
National Marine Fisheries Service  
11420 N. Kendall Drive, Suite 103  
Miami, FL 33176  
cc: Rickey N. Ruebsamen, Acting Assistant

Regional Administrator  
NMFS, Southeast Region  
Habitat Conservation Division  
9721 Executive Center Drive North, Suite  
201  
St. Petersburg, FL 33702

Dr. Janet Matthews, Director  
State Historic Preservation Officer  
Division of Historical Resources  
R.A. Gray Building, Room 305  
500 South Bronough Street  
Tallahassee, FL 32399-0250  
cc: Laura Kammerer, Section Administrator  
Compliance and Review Section

Florida State Clearinghouse  
Department of Community Affairs  
2555 Shumard Oak Blvd.  
Tallahassee, Florida 32399-2100

Mark Robson, Regional Director  
Florida Fish and Wildlife Conservation  
Commission  
South Region  
8535 North Lake Blvd.  
West Palm Beach, FL 33412

Gus Rios, Branch Manager  
FDEP, South District - Marathon Branch  
2796 Overseas Highway, Suite 221  
Marathon, FL 33050  
cc: Richard Cantrell, South District Director  
FDEP – South District Office  
2295 Victoria Avenue, Suite 364  
Fort Myers, FL 33902-2549

Cecilia Weaver, Acting Director  
South Florida Water Management District  
Florida Keys Service Center  
80431 Old Hwy.  
Islamorada, FL 33036

John Studt, South Permits Branch Chief  
U.S. Army Corps of Engineers  
Regulatory Permits Division  
4400 PGA Blvd., Suite 500  
Palm Beach Gardens, FL 33410  
cc: Vic Anderson

U.S. Army Corps of Engineers  
Marathon Regulatory Office  
2796 Overseas Highway, Suite 221  
Marathon, FL 33050-4276

Heinz J. Mueller, Chief  
US EPA, Region 4  
Office of Environmental Assessment  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303

## Appendix B Agency Coordination Letters

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Gerald Briggs, Chief  
Florida Department of Health  
Bureau of Onsite Sewage, HSES  
4052 Bald Cypress Way, Bin #A08  
Tallahassee, FL 32399-1713

Bart Bibler, Chief  
Florida Department of Health  
Bureau of Water Programs, HSEW  
4042 Bald Cypress Way  
Tallahassee, FL 32311

Teresa Tinker, Policy Coordinator  
Growth Management and Strategic Planning  
Office of the Governor  
1501 Capitol  
Tallahassee, FL 32399-0001

Miles Anderson  
Division of Emergency Management  
Florida Department of Community Affairs  
2555 Shumard Oak Blvd.  
Tallahassee, FL 32399-2100



June 5, 2003

Miles Anderson  
Division of Emergency Management  
Florida Department of Community Affairs  
2555 Shumand Oak Blvd.  
Tallahassee, FL 32399-2100

**Subject: Notice of Draft Supplemental Environmental Assessment (SEA) for  
the Key Largo Wastewater System, Monroe County, Florida.**

Dear Mr. Anderson:

This purpose of this letter is to provide your agency with notice that URS Group, Inc., on behalf of the Federal Emergency Management Agency (FEMA), is preparing a Draft Supplemental Environmental Assessment (SEA) for the Key Largo Wastewater System, Monroe County, Florida. The Draft SEA evaluates several wastewater management alternatives proposed for Key Largo, and the potential environmental consequences associated with those alternatives. At this time, FEMA requests your comments regarding the range of alternatives (attached). Please note that this attachment represents only a portion of the draft SEA. Additionally, a street map of the project vicinity has also been attached.

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The National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR Parts 1500 through 1508), and FEMA regulations for NEPA compliance (44 CFR Part 10) direct FEMA and other Federal agencies to fully understand and take into consideration during decision making, the environmental consequences of proposed Federal actions (projects). Therefore,

URS Corporation  
Eastern Financial Building, Suite 1000  
700 South Royal Poinciana Boulevard  
Miami Springs, FL 33166  
Tel: 305.884.8900  
Fax: 305.884.2665



Miles Anderson  
Division of Emergency Management  
Florida Department of Community Affairs  
June 5, 2003  
Page 2 of 2

FEMA must comply with NEPA, and other applicable Federal laws and regulations, before making Federal funds available for any disaster recovery and mitigation actions. A Programmatic Environmental Assessment (PEA) for Wastewater Management Improvements in the Florida Keys was prepared in accordance with these regulations, and provides a framework to address impacts of a range of wastewater treatment projects in the Florida Keys. In accordance with 40 CFR Part 1508.28, the Draft SEA for Key Largo tiers from the PEA, and addresses issues specific to this project location.

FEMA respectfully seeks your written comments within 30 days to the letterhead address. If you have any questions or comments, please do not hesitate to contact me at (305) 884-8900, or Ms. Science Kilner, FEMA Lead Environmental Specialist, at (770) 220-5357. Thank you very much for your assistance. Your comments will be considered during the Draft SEA preparation process.

Sincerely,

URS Group, Inc.

A handwritten signature in black ink, appearing to read 'R. Mendieta', written over a horizontal line.

Ramon Mendieta  
Environmental Scientist

Attachments as noted

cc: Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Stephen Carruth, URS Group, Inc., Environmental Planner



June 5, 2003

Richard Cantrell, South District Director  
Florida Department of Environmental Protection  
South District Office  
2295 Victoria Avenue, Suite 364  
Fort Myers, Florida 33902-2549

**Subject: Notice of Draft Supplemental Environmental Assessment (SEA) for the Key Largo Wastewater System, Monroe County, Florida.**

Dear Mr. Cantrell:

This purpose of this letter is to provide your agency with notice that URS Group, Inc., on behalf of the Federal Emergency Management Agency (FEMA), is preparing a Draft Supplemental Environmental Assessment (SEA) for the Key Largo Wastewater System, Monroe County, Florida. The Draft SEA evaluates several wastewater management alternatives proposed for Key Largo, and the potential environmental consequences associated with those alternatives. At this time, FEMA requests your comments regarding the range of alternatives (attached). Please note that this attachment represents only a portion of the draft SEA. Additionally, a street map of the project vicinity has also been attached.

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Richard Cantrell, South District Director  
Florida Department of Environmental Protection  
June 5, 2003  
Page 2 of 2

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Sincerely,

URS Group, Inc.

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Ramon Mendieta  
Environmental Scientist

Attachments as noted

cc:

Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Stephen Carruth, URS Group, Inc., Environmental Planner



June 5, 2003

Gus Rios, Branch Manager  
Florida Department of Environmental Protection  
South District - Marathon Branch  
2796 Overseas Highway, Suite 221  
Marathon, FL 33050

**Subject: Notice of Draft Supplemental Environmental Assessment (SEA) for  
the Key Largo Wastewater System, Monroe County, Florida.**

Dear Mr. Rios:

This purpose of this letter is to provide your agency with notice that URS Group, Inc., on behalf of the Federal Emergency Management Agency (FEMA), is preparing a Draft Supplemental Environmental Assessment (SEA) for the Key Largo Wastewater System, Monroe County, Florida. The Draft SEA evaluates several wastewater management alternatives proposed for Key Largo, and the potential environmental consequences associated with those alternatives. At this time, FEMA requests your comments regarding the range of alternatives (attached). Please note that this attachment represents only a portion of the draft SEA. Additionally, a street map of the project vicinity has also been attached.

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Gus Rios, Branch Manager  
Florida Department of Environmental Protection  
June 5, 2003  
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URS Group, Inc.

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Ramon Mendieta  
Environmental Scientist

Attachments as noted

cc:

Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Stephen Carruth, URS Group, Inc., Environmental Planner



November 20, 2003

Mr. Gus Rios  
Branch Manager  
South District – Marathon Branch  
Florida Department of Environmental Protection (FDEP)  
2796 Overseas Highway, Suite 221  
Marathon, FL 33050

**Subject: Notice of Availability of the Draft Supplemental Environmental Assessment (SEA) of Proposed Wastewater Treatment Improvements for Key Largo in the Florida Keys, Florida.**

Dear Mr. Rios

On behalf of the Federal Emergency Management Agency (FEMA), URS Group, Inc. is providing your agency with a compact disk copy of the Draft Supplemental Environmental Assessment (SEA) for Wastewater Treatment Improvements in Key Largo, Monroe County, Florida. The SEA evaluates the impacts of constructing wastewater treatment facilities in the community of Key Largo. A separate, initial letter outlining FEMA's intent to prepare the Draft SEA for this project was sent to you and via the Florida State Clearinghouse on June 5, 2003. On August 5, 2003, Mr. Robert Hall of FDEP's Intergovernmental Programs Office replied with several concerns relating to the project, including: wastewater treatment system siting, sufficient distance and cross-connection avoidance between wastewater and potable water piping, and Environmental Resource Permitting. FEMA has worked with its applicant to resolve some of these issues, and the Draft SEA addresses pertinent FDEP concerns. FEMA has also completed a formal Endangered Species Act consultation with the U.S. Fish and Wildlife Service to address adverse biological resource effects. The remaining design/engineering/site mitigation issues will be resolved when our applicant coordinates project permits with your office and others. At this time, FEMA welcomes additional comments your agency may have to the entire document, which is provided on the enclosed CD.

A public meeting on the Draft SEA will be held for the Key Largo Project on December 3, 2003. The public review period for the Key Largo Draft SEA is from November 21 to December 19, 2003.

### **Background**

In 1998, during the aftermath of Hurricane Georges, Congress allocated additional monies for long-term disaster recovery projects in the State of Florida to assist counties whose needs were yet unmet through allocation of primary disaster relief funds. This Unmet Needs money was earmarked for the counties most impacted by Hurricane Georges, including Monroe County. Monroe County, Florida requested that wastewater management improvement projects be

URS Group, Inc.  
200 Orchard Ridge Drive, Suite 101  
Gaithersburg, MD 20878  
Tel: 301.258.9780  
Fax: 301.869.8728

Mr. Gus Rios  
Florida Department of Environmental Protection  
November, 20 2003  
Page 2

considered for disaster funding since many existing wastewater facilities in Monroe County do not provide adequate collection, treatment, or disposal, and thus contribute greatly to degraded water quality in the Florida Keys. Since then, FEMA has received grant applications from several Monroe County communities to upgrade their current wastewater treatment facilities.

The National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR Parts 1500 through 1508), and FEMA regulations for NEPA compliance (44 CFR Part 10) direct FEMA and other federal agencies to fully understand and take into consideration during decision making, the environmental consequences of proposed federal actions (projects). Therefore, FEMA must comply with NEPA, and other applicable federal laws and regulations, before making federal funds available for disaster recovery and mitigation actions. FEMA prepared a Programmatic Environmental Assessment (PEA) and reached a Programmatic Finding of No Significant Impact (PFONSI) on December 23, 2002, which was previously submitted to your office for review. This SEA tiers from that document.

### Submitting Comments

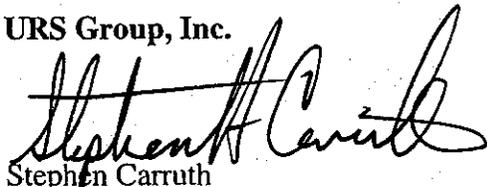
Please submit your comments on the Draft SEA in writing to Ms. Science Kilner, Lead Environmental Specialist, FEMA Region IV within 30 days of the receipt of this letter. Ms. Kilner's contact information is:

FEMA Region IV – Federal Insurance and Mitigation Division  
3003 Chamblee-Tucker Road  
Atlanta, GA 30341  
Fax: (770) 220-5440

Your comments will be considered during the Final SEA preparation process. Thank you for your involvement in this documentation process.

Sincerely,

URS Group, Inc.



Stephen Carruth  
Project Environmental Scientist

Attachments



June 5, 2003

Gerald Briggs, Chief  
Florida Department of Health  
Bureau of Onsite Sewage, HSES  
4052 Bald Cypress Way, Bin #A08  
Tallahassee, FL 32399-1713

**Subject: Notice of Draft Supplemental Environmental Assessment (SEA) for  
the Key Largo Wastewater System, Monroe County, Florida.**

Dear Mr. Briggs:

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700 South Royal Poinciana Boulevard  
Miami Springs, FL 33166  
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Gerald Briggs, Chief  
Florida Department of Health  
June 5, 2003  
Page 2 of 2

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URS Group, Inc.

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Ramon Mendieta  
Environmental Scientist

Attachments as noted

cc: Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Stephen Carruth, URS Group, Inc., Environmental Planner



June 5, 2003

Bill Causey, Superintendent  
Florida Keys National Marine Sanctuary  
P.O. Box 500368  
Marathon, FL 33050

**Subject: Notice of Draft Supplemental Environmental Assessment (SEA) for the Key Largo Wastewater System, Monroe County, Florida.**

Dear Mr. Causey:

This purpose of this letter is to provide your agency with notice that URS Group, Inc., on behalf of the Federal Emergency Management Agency (FEMA), is preparing a Draft Supplemental Environmental Assessment (SEA) for the Key Largo Wastewater System, Monroe County, Florida. The Draft SEA evaluates several wastewater management alternatives proposed for Key Largo, and the potential environmental consequences associated with those alternatives. At this time, FEMA requests your comments regarding the range of alternatives (attached). Please note that this attachment represents only a portion of the draft SEA. Additionally, a street map of the project vicinity has also been attached.

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Eastern Financial Building, Suite 1000  
700 South Royal Poinciana Boulevard  
Miami Springs, FL 33166  
Tel: 305.884.8900  
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Bill Causey, Superintendent  
Florida Keys National Marine Sanctuary  
June 5, 2003  
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Sincerely,

URS Group, Inc.

Ramon Mendieta  
Environmental Scientist

Attachments as noted

cc: Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Stephen Carruth, URS Group, Inc., Environmental Planner



June 5, 2003

Florida State Clearinghouse  
Department of Environmental Protection  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

**Subject: Notice of Draft Supplemental Environmental Assessment (SEA) for  
the Key Largo Wastewater System, Monroe County, Florida.**

Dear Sir or Madam:

This purpose of this letter is to provide your agency with notice that URS Group, Inc., on behalf of the Federal Emergency Management Agency (FEMA), is preparing a Draft Supplemental Environmental Assessment (SEA) for the Key Largo Wastewater System, Monroe County, Florida. The Draft SEA evaluates several wastewater management alternatives proposed for Key Largo, and the potential environmental consequences associated with those alternatives. At this time, FEMA requests your comments regarding the range of alternatives (attached). Please note that this attachment represents only a portion of the draft SEA. Additionally, a street map of the project vicinity has also been attached.

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Florida State Clearinghouse  
Department of Environmental Protection  
June 5, 2003  
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Ramon Mendieta  
Environmental Scientist

Attachments as noted

cc: Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Stephen Carruth, URS Group, Inc., Environmental Planner



# Department of Environmental Protection

Jeb Bush  
Governor

Marjory Stoneman Douglas Building  
3900 Commonwealth Boulevard  
Tallahassee, Florida 32399-3000

David B. Struhs  
Secretary

August 5, 2003

RECEIVED AUG 11 2003

Mr. Ramon Mendieta  
Environmental Scientist  
URS Corporation  
Eastern Financial Building  
Suite 1000  
700 South Royal Poinciana Boulevard  
Miami Springs, Florida 33166

Re: Federal Emergency Management Agency, Hazard Mitigation Assistance, Draft Supplemental Environmental Assessment (DSEA) for the Key Largo Wastewater System, Monroe County, Florida

SAI: FL200306112523C

Dear Mr. Mendieta:

The Florida State Clearinghouse, pursuant to Executive Order 12372, Gubernatorial Executive Order 95-359, the Coastal Zone Management Act, 16 U.S.C. §§ 1451-1464, as amended, and the National Environmental Policy Act, 42 U.S.C. §§ 4321, 4331-4335, 4341-4347, as amended, has coordinated the review of the above-referenced Draft Supplemental Environmental Assessment (DSEA) for the proposed project.

The Department of Environmental Protection (DEP) outlines several concerns related to the proposed locations of the wastewater treatment systems, and enumerates the requirements for Advanced Waste Treatment, cross connection control and Environmental Resource Permitting. Please see the attached DEP memo for additional comments, concerns and details.

The Florida Fish and Wildlife Conservation Commission (FFWCC) indicates that the information provided is not sufficient for State review of the potential impacts to ecological resources at the candidate sites. Information on fish, wildlife and other environmental resources is missing from evaluation of the alternative project sites. The FFWCC has previously submitted its written opposition to the 22-acre site at Mile Marker 100.5 (Alternative 2) as well as its opposition to construction of the proposed wastewater treatment facility at this site. The Commission recommends that the proposed sewage treatment facility be constructed on the disturbed site at MM 98, Alternative 3. Please see the enclosed letter from the FFWCC for additional details.

The South Florida Water Management District (SFWMD) states that inadequate information has been provided from which to determine the environmental impacts of the project, and its consistency with the Florida Coastal Management Program. The District indicates that Alternative 1 has no details that can be assessed, and the fact that FEMA will not provide funding does not adequately explain this alternative. The SFWMD recommends that the DSEA describe the current system for wastewater

*"More Protection, Less Process"*

Printed on recycled paper.

Mr. Ramon Mendieta  
August 5, 2003  
Page 2

removal and treatment, and outline the requirements of the Florida Statutory Treatment Standard of 2010, and how it applies to this project. The District indicates that alternative 2 is confusing with respect to which numbers apply to Phase I and which numbers apply to phase II. Please see the enclosed letter from the SFWMD for additional issues and concerns.

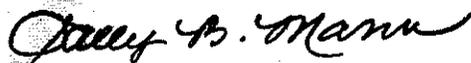
The South Florida Regional Planning Council (SFRPC) believes that the project will further its goals for a more livable, sustainable and competitive region and has summarized the relevant goals and policies that apply to this project. Please see the attached comments from the SFRPC and specific recommendations for complying with permitting requirements.

The Florida Department of Transportation (FDOT) states that the project may impact its road rights-of-way and may require permits. Lane closures or traffic channelization on the state roadway system may require permits from the FDOT permit Office. Please see the FDOT comments on the Clearinghouse printout for additional information.

Based on the information contained in the DSEA, and the comments provided by our reviewing agencies, as summarized above and enclosed, the state has determined that, at this stage, the above-referenced project is consistent with the Florida Coastal Management Program (FCMP). All subsequent environmental documents prepared for this project must be reviewed to determine the project's continued consistency with the FCMP. The state's continued concurrence with the project will be based, in part, on the adequate resolution of issues identified during this and subsequent reviews. The state's final concurrence on the project's consistency with the FCMP will be determined during the environmental permitting stage.

Thank you for the opportunity to review this project. If you have any questions regarding this letter, please contact Mr. Bob Hall at 850/245-2163.

Sincerely,



Sally B. Mann, Director  
Office of Intergovernmental Programs

SBM/rwh  
Enclosures

cc: Jim Golden, SFWMD  
Gus Rios, DEP Marathon  
Natalie R. Schneider, SFRPC  
Brian Barnett, FFWCC  
Sandra Whitmire, DOT

Florida Department of  
**Environmental Protection**

**Memorandum**

**TO:** Florida State Clearinghouse

**FROM:** Robert W. Hall, Environmental Specialist   
Office of Intergovernmental Programs

**DATE:** August 5, 2003

**PROJECT:** Federal Emergency Management Agency, Hazard Mitigation Assistance,  
Draft Supplemental Environmental Assessment (SEA) for the Key Largo  
Wastewater System, Monroe County, Florida

**SAI:** FL200306112523C

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The Department has reviewed the above-referenced project and offers the following comments.

Several major concerns have been expressed by the DEP Marathon office, and include the location of the vacuum station and wastewater treatment plant on the northern site, or the location of the vacuum station on the northern site with the treatment plant on the southern site. This location will disturb a high quality hardwood hammock, which may not be in compliance with the Monroe County Comprehensive Plan.

If there is to be dredging and filling of surface waters or impacts to wetlands, an Environmental Resource Permit will be required from the department's Marathon office. The NPDES office in Tallahassee will also be contacted to determine if the proposed projects will require NPDES permits for stormwater management.

The proposed treatment plants will be required to meet Advanced Waste Treatment (AWT) standards, and the wastewater collection system must meet the separation standards of Chapter 62-604, F.A.C., with prevention of cross connections between potable water mains and wastewater collection systems.

Please see the attached summary report for further details on the Florida Keys requirements for wastewater treatment, to include permitting requirements. For technical assistance with DEP's requirements please contact Mr. Gus Rios at 305/289-2310.

Key Largo Wastewater System SEA Comments  
SAI #: FL03-2523C

**General:**

- ❖ The construction of the wastewater collection, treatment and disposal systems will require wastewater permits from the DEP's South District Office in Ft. Myers.
- ❖ On February 26, 2003, an application (application number: 211402-001) to construct a collection/transmission system was received in the Department's South District Office/Ft. Myers. Russell Eastenes is the Department engineer assigned to process the application. He will be responsible for reviewing the documents for compliance with all applicable Department regulations prior to issuing any permits. Since the application was received, the following activities have occurred:
  - On March 26, 2003, a Request for Additional Information (RAI) was sent by Russell Eastenes to the permittee.
  - On April 25, 2003, a response was sent to the Ft. Myers District office in response to the Department's 3/25/03 RAI.
  - On May 23, 2003, a second RAI was sent from Ft. Myers.
- ❖ Any dredging or filling in wetlands or surface waters will require Environmental Resource Permits (ERP) from the DEP's Marathon office.
- ❖ The location of the vacuum station and wastewater treatment plant on the Northern site or the vacuum station in this location (with the treatment plant on the Southern site) will disturb a high quality hardwood hammock. Please be advised that the Department of Community Affairs and Monroe County should be contacted to ensure compliance with the Monroe County Comprehensive Plan.
- ❖ The Department's NPDES Section in Tallahassee shall be contacted to determine if the construction projects will require NPDES permits for stormwater.

**Alternative 2-new treatment plant and collection system**

- ❖ Section 1.2 *New wastewater treatment plant on Northern site*
  - It is stated that Phase I will provide new service to residents and business owners in Key Largo Trailer Village and Key Largo Park, a flow of approximately 0.122 MGD. This size treatment plant will need to meet Advanced Waste Treatment (AWT) standards of 5 mg/L for Carbonaceous Biochemical Oxygen Demand (CBOD<sub>5</sub>) and Total Suspended Solids (TSS), 3 mg/L Total Nitrogen, and 1 mg/L Total Phosphorus.
  - The Phase II wastewater treatment facility, capable of serving the entire Key Largo Wastewater Service District from the 91 Mile Marker to the 106.5 Mile Marker, with a capacity of 2.25 MGD will also be required to meet effluent AWT standards.
- ❖ Section 1.2.1 *Wastewater collection system*
  - The Department will require reasonable assurance that, pursuant to Chapter 62-604, FAC:
    1. separation distances between potable water mains and wastewater collection systems are maintained
    2. cross connections between potable water mains and wastewater collection systems shall be prevented
  - Regarding plumbing connections at individual homes, FAC Rule 62-604.100(1) states that any single, individual gravity service connection to a collection system sized and intended to serve a single building is exempted from the requirements of this rule. The Department of Health (DOH) is responsible for ensuring the homeowners' on site systems are properly abandoned in accordance with the requirements of FAC Rule 64E-6.011.
  - On page 5 it is stated that "vacuum collection stub-outs would be provided to the existing residential side streets on the bayside of US1 in order to facilitate the future extension of wastewater collection and transmission services to the Key Largo Park and Sunset Waterways subdivisions." Please be advised that any additional collection systems or modifications to existing systems will require Department permits.

Key Largo Wastewater System SEA Comments  
SAI #: FL03-2523C

❖ Section 1.2.2 Wastewater Treatment Plant

- The location of the treatment plant on a lot that is comprised of high quality hardwood hammock will need to be coordinated with Monroe County and the Department of Community Affairs for compliance with the Monroe County Comp Plan.
- On Page 9, it is stated that “filtration may also be needed to produce effluent with TSS of not more than 10 mg/L.” The facility, a 0.150 MGD facility, will need to meet AWT effluent standards of 5 mg/L TSS.
- Also on page 9 it is stated that “The effluent disinfection process would consume all calcium hypochlorite or sodium hypochlorite prior to effluent discharge.” In accordance with F.A.C. Rule 62-600.440(4)(b), the effluent must maintain a total residual chlorine (TRC) of no less than 0.5 mg/L after 15 minutes of contact at peak hourly flow.

Alternative 3-New Wastewater treatment plant on Southern Site

❖ Section 1.3.2 Vacuum Pump Station

- the location of the vacuum pump station on a high quality hardwood hammock lot will need to be coordinated with Monroe County and the Department of Community Affairs for compliance with the Monroe County Comp Plan.

❖ Section 1.3.3 Wastewater Transmission System

- The Department will require reasonable assurance that, pursuant to Chapter 62-604, FAC:
  1. separation distances between potable water mains and wastewater collection systems are maintained
  2. cross connections between potable water mains and wastewater collection systems shall be prevented

❖ Section 1.3.4 Wastewater Treatment Plant

- The location results in the closest private residence being a distance of 100' away. This may provide a very good possibility for noise, lighting, odor complaints. F.A.C. Rule 62-600.400(2)(a) requires the facility shall be designed and located on the site so as to minimize adverse effects from odors, noise, aerosol drift and lighting.
- The basis of design comments for this facility are the same as those for the construction of the alternate location, and are:
  1. On Page 9, it is stated that “filtration may also be needed to produce effluent with TSS of not more than 10 mg/L.” The facility, a 0.150 MGD facility, will need to meet AWT effluent standards of 5 mg/L TSS.
  2. On page 9 it is stated that “The effluent disinfection process would consume all calcium hypochlorite or sodium hypochlorite prior to effluent discharge.”  
In accordance with F.A.C. Rule 62-600.440(4)(b), the effluent must maintain a total residual chlorine (TRC) of no less than 0.5 mg/L after 15 minutes of contact at peak hourly flow.

**For Florida Fish and Wildlife Conservation Commission Response to Florida State Clearinghouse dated June 19,2003 see Appendix H – Biological Resources**



## SOUTH FLORIDA WATER MANAGEMENT DISTRICT

3301 Gun Club Road, West Palm Beach, Florida 33406 • (561) 686-8800 • FL WATS 1-800-432-2045 • TDD (561) 697-2574  
Mailing Address: P.O. Box 24680, West Palm Beach, FL 33416-4680 • www.sfwmd.gov

GOV 04-14

July 2, 2003

Ms. Lauren Milligan  
Florida State Clearinghouse  
Florida Dept. of Environmental Protection  
3900 Commonwealth Blvd., MS 47  
Tallahassee, FL 32399-3000

Dear Ms. Milligan:

**Subject: Key Largo Wastewater System, Monroe County  
Supplemental Environmental Assessment [SAI#: FL200306112523C]**

In response to your request, South Florida Water Management District (SFWMD) staff has reviewed the Draft Supplemental Environmental Assessment (DSEA) for the above subject project for consistency with the Florida Coastal Zone Management Program (FCMP). The purpose of the DSEA is to evaluate several wastewater management alternatives proposed for Key Largo and the potential environmental consequences associated with the alternatives evaluated.

Projects reviewed by the SFWMD, pursuant to the FCMP, are reviewed for consistency with the provisions of Chapter 373, F.S. (Florida Water Resources Act of 1972, as amended), as well as the programs and regulations developed thereunder. Chapter 373, F.S. authorizes the SFWMD to regulate the withdrawal, diversion, storage, and consumptive uses of water, the construction and operation of stormwater management systems, and work in, on, or over surface waters or wetlands. Chapter 373, F.S. also authorizes the SFWMD to acquire and manage land, to conduct research and investigations into all aspects of water resource management, and to disseminate information relating to the water resources of the state to public and private users.

Based on an analysis of the mandatory enforceable provisions and recommended policies of the core FCMP statutes and implementing rules administered by the SFWMD, staff has determined that inadequate information has been provided to determine the consistency of this project with the FCMP. Although fairly detailed design information has been provided for the proposed wastewater treatment facilities, insufficient information has been provided regarding the potential environmental impacts associated with the construction of the proposed wastewater treatment facilities on the northern and southern sites. While the DSEA contains a number of references to the Programmatic Environmental Assessment (PEA) and the PEA may very well contain a more detailed evaluation of the potential environmental impacts associated with the construction of the proposed wastewater

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Michael Collins  
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Lennart E. Lindahl, P.E.

Kevin McCarty  
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Henry Dean, *Executive Director*

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treatment facilities on the northern and southern sites, SFWMD staff reviewing the DSEA is not familiar with the PEA nor the information contained therein. Consequently, the SFWMD's review of the proposed project (see below) is based solely on the information contained in the DSEA.

#### General Comments

- (1) The DSEA does not include a detailed environmental assessment of any of the three alternatives. Current environmental conditions, the impacts and/or benefits of each alternative on the environment, and an environmental comparison of one alternative to another are not provided. In particular, there is no mention of groundwater and/or surface water impacts and/or benefits.
- (2) Alternatives 2 and 3 are essentially the same project located on different sites. The DSEA should evaluate alternatives using disposal methods other than shallow injection wells (e.g., reclaimed water). Please note that reclaimed water may be a more cost-effective alternative to shallow injection wells.

#### Alternative 1 – No Action Alternative

- (3) No details are provided for this alternative. Stating that FEMA will not provide funding is not an alternative. The DSEA should describe the current system for wastewater removal and treatment, outline the requirements of the Florida Statutory Treatment Standard of 2010, indicate how it applies to this project, and discuss the current and future environmental conditions and issues if no action is taken.

#### Alternative 2 – New Wastewater Treatment Plant on Northern Site

- (4) The entire description for Alternative 2 is very confusing with respect to which numbers apply to Phase I and which apply to Phase II. The DSEA does not specify whether the 2.6 acres required for the site is only for Phase I or for Phases I and II combined. No details are provided on the treatment equipment associated with Phase II or the actual Phase II construction except for "expansion of modular increments". The DSEA should either state that it only covers Phase I for Alternatives 2 and 3 and a supplemental EA will be performed for Phase II or it should address both Phases I and II in their entirety.
- (5) The success of this alternative (as well as Alternative 3) is dependent on the economic ability of the homeowners to decommission and properly abandon their existing on-site waste disposal systems and to connect to the service laterals. An economic analysis should be performed to verify that the residents will be

- able to pay for the proposed wastewater improvements. Otherwise, a significant number of existing on-site waste disposal systems may not be properly decommissioned/abandoned. This could pose a continuing environmental risk to ground and surface water quality.
- (6) There is no mention of groundwater-related issues in the DSEA. The DSEA should include a discussion of groundwater levels on and in the vicinity of the proposed site and should address the potential impacts to ground water levels/quality during construction and operation of the proposed facilities.
  - (7) The potential site for the pump station and treatment plant is described as a high quality hardwood hammock habitat. There is no mention of existing wildlife. There is no mention of the site's hydrology, existing surface water features, surface water conveyances, and drainage conditions. All of the potential impacts associated with the proposed pump station and treatment plant that will affect any of these environmental characteristics need to be identified. The DSEA should clearly state if any direct conveyances to the Straits of Florida (1,500 feet away) or to Florida Bay (2,500 feet away) are proposed. A plan for collecting and treating stormwater runoff should be included.
  - (8) The potential impacts associated with injecting 400 gallon per minute (gpm) per well of effluent into the ground needs to be addressed as well as the quality of the water being injected compared to the current groundwater quality. The DSEA should address whether the site's geology supports shallow well injection.
  - (9) The DSEA should include additional information to substantiate that one groundwater monitoring well be sufficient to monitor the effects of the shallow well injection and the operation of the wastewater treatment plant. Detailed design information should be included indicating that a monitoring well depth of 30 feet is sufficient for a 60 foot deep injection well with a 60 to 90 foot deep gravel-packed open hole section.
  - (10) Peak hourly flows are reported in gallons per day (gpd). Peak flows are usually calculated on a daily basis, during morning hours, at noon, and in the afternoon, not for 24 hours.
  - (11) The DSEA indicates that vacuum pumps will be used instead of submersible pumps. Consequently, the DSEA should confirm that the grade elevation for the proposed vacuum pumps is above maximum flood levels.

- (12) The DSEA should address whether the pretreatment screenings can be disposed of from the collection hopper or trash receptacle directly into a sanitary landfill without any treatment such as chlorination.
- (13) The SBR, USBF, Bardenpho, and Ludzak-Ettinger processes are not recommended for these applications. Conventional activated sludge or an immerse membrane bioreactor with nitrification and chemical addition for phosphorus removal offer more flexibility and ease of operation than the above-mentioned processes.
- (14) Disinfection with calcium hypochlorite tablets or briquettes is not cost-effective for plants larger than 100,000 gpd. Chlorine in liquid or gas form is acceptable; however, it is highly toxic and requires handling and storage facilities. Ultraviolet (UV) disinfection is the preferred method of disinfection in an environmentally sensitive area such as the Florida Keys.
- (15) On-site dewatering of the digested bio-solids (e.g., filterpress) may be more cost-effective than hauling 5,000-gallon/month of bio-solids to a municipality. This option should be considered.

#### Alternative 3 – New Wastewater Treatment Plant on Southern Site

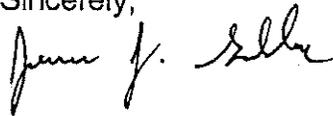
- (16) For Alternative 2 (northern site), the DSEA indicates that the finished floor elevations for the pump station and treatment plant will be built “above the base flood elevation of 8 feet National Geodetic Vertical Datum.” However, for Alternative 3, which utilizes the same location for the pump station, the DSEA indicates that the pump station will be constructed “above the 100-year floodplain level.” This discrepancy should be clarified.
- (17) Similar to Alternative 2, the DSEA does not include any information on the site’s hydrology, existing surface water features, surface water conveyances, and drainage conditions.
- (18) The DSEA indicates that Alternative 2 requires 2.6 acres for both the Phase I pump station and the treatment plant. Alternative 3 requires 3.8 acres for the treatment plant only. The DSEA should specify if all of the southern site will be utilized for Alternative 3 and indicate if it is large enough for the Phase II expansion.
- (19) For Alternative 3, there is no mention of the injection wells, the number of wells, and where they will be located. In addition, there is no mention of the geology of

Ms. Lauren Milligan  
July 2, 2003  
Page 5

this site or an evaluation of the appropriateness of this site for shallow well injection.

If you have any questions concerning the above or if I can be of further assistance, please do not hesitate to contact me at (561) 682-6862.

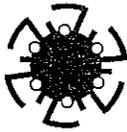
Sincerely,

A handwritten signature in cursive script, appearing to read "James J. Golden".

James J. Golden, AICP  
Senior Planner  
Environmental Resource Regulation

/jjg

c: Ramon Mendiata, URS Corporation



June 30, 2003

Ms. Lauren Milligan  
Florida State Clearinghouse  
Florida Department of Environmental Protection  
3900 Commonwealth Boulevard, Mail Station 47  
Tallahassee, FL 32399-3000

RE: SFRPC #03-0633, SAI #FL200306112523C, Request for comments on a Notice of Draft Environmental Assessment for the Key Largo Wastewater System, URS Group, Inc. on behalf of U.S. Department of Commerce - Federal Emergency Management Agency, Monroe County.

Dear Ms. Milligan:

We have reviewed the above-referenced program and have the following comments:

- Council staff believes the project will further our goals for a more livable, sustainable, and competitive region. The project is generally consistent with the goals and policies of the *Strategic Regional Policy Plan for South Florida*, particularly the following:

**Strategic Regional Goal**

2.2 Revitalize deteriorating urban areas.

**Regional Policies**

2.2.1 Give priority to development in areas that are blighted, characterized by underdevelopment or underemployment and are in need of redevelopment; among these, secondary priority should be given to areas within which adequate infrastructure and support services are either programmed or available.

2.2.2 Public facility and service providers should give priority to eliminating any infrastructure deficiencies which would impede rehabilitation or redevelopment of blighted areas.

**Strategic Regional Goal**

2.3 Enhance the economic competitiveness of the region and ensure the adequacy of its public facilities and services by eliminating the existing backlog, meeting the need for growth in a timely manner, improving the quality of services provided and pursuing cost-effectiveness and equitability in their production, delivery and financing.

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**Regional Policies**

- 2.3.3 The public sector should give priority to the funding of those improvements which support the general welfare of its citizenry and promote public goals, objectives and plans.
- 2.3.11 Give priority to the construction, maintenance or reconstruction of public facilities needed to serve existing development most effectively.
- 2.3.12 Provide incentives for development and redevelopment to use existing public facilities and services.
- 2.3.13 Local governments should provide centralized sewer service in areas where existing septic tanks are a problem and adopt and implement stormwater level of service standards consistent with those recommended by the South Florida Water Management District.
- 2.3.15 Impact review procedures shall consider the impacts of development on state, regional and local public facilities and services.
- 2.3.30 Local governments should establish as wide a range of financing methods for the provision of public facilities as possible. Where impact fees are assessed, procedures, schedules, and programs for the expenditure of these fees in a timely and equitable manner shall be developed.

Thank you for the opportunity to comment. If you require further information, please contact me.

Sincerely,



Natalie R. Schneider  
Senior Planner

NRS/

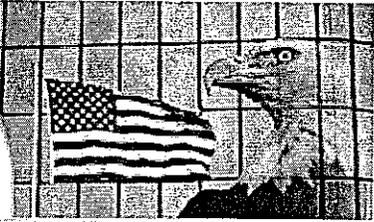
cc: Timothy McGarry, Monroe County Growth Management



# Florida

Department of Environmental Protection

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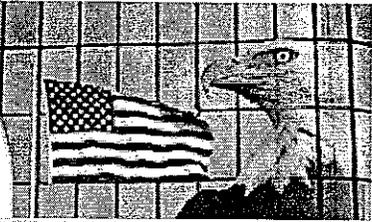
Project Information	
<b>Project:</b>	FL200306112523C
<b>Comments Due:</b>	July 09, 2003
<b>Letter Due:</b>	August 08, 2003
<b>Description:</b>	FEDERAL EMERGENCY MANAGEMENT AGENCY - HAZARD MITIGATION ASSISTANCE - DRAFT SUPPLEMENTAL ENVIRONMENTAL ASSESSMENT (SEA) FOR THE KEY LARGO WASTEWATER SYSTEM - MONROE COUNTY, FLORIDA.
<b>Keywords:</b>	FEMA - HAZARD MITIGATION - KEY LARGO WASTEWATER SYSTEM - MONROE COUNTY
<b>CFDA #:</b>	83.519
Agency Comments:	
<b>SOUTH FL RPC - SOUTH FLORIDA REGIONAL PLANNING COUNCIL</b>	
No Final Comments Received	
<b>MONROE -</b>	
No Final Comments Received	
<b>ENVIRONMENTAL POLICY UNIT - OFFICE OF POLICY AND BUDGET, ENVIRONMENTAL POLICY UNIT</b>	
nc	
<b>COMMUNITY AFFAIRS - FLORIDA DEPARTMENT OF COMMUNITY AFFAIRS</b>	
Released Without Comment	
<b>FISH and WILDLIFE COMMISSION - FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION</b>	
3-PAGE LETTER BY BRIAN BARNETT DATED JUNE 19, 2003 (PLUS ENCLOSURE)	
<b>HEALTH - FLORIDA DEPARTMENT OF HEALTH</b>	
NC	
<b>STATE - FLORIDA DEPARTMENT OF STATE</b>	
nc	
<b>TRANSPORTATION - FLORIDA DEPARTMENT OF TRANSPORTATION</b>	
<p>The purpose of this assessment is to evaluate several wastewater alternatives proposed for Key Largo, and the potential environmental consequences associated with those alternatives. A Programmatic Environmental Assessment (PEA) for Wastewater Management Improvements in the Florida Keys was prepared in accordance with NEPA providing a framework to address impacts of a range of wastewater treatment projects in the Florida Keys. Alternatives identified in the Monroe County Sanitary Wastewater Master Plan (2000) and in the PEA are evaluated for the proposed Key Largo Wastewater Management System. 1. FDOT permits may be required for project-related activities, which occur within FDOT right-of-way. Therefore, it may be necessary to coordinate with the FDOT's Permit Office. 2. Should the need for lane closures or traffic channelization on the state roadway system arise, Maintenance-of-Traffic Plans may be necessary. Coordination with the FDOT Traffic Operations Office will be required. 3. Field assessment may be required to determine the presence of wetlands adjacent to the project corridor. Thank you for providing DEMO with the opportunity to comment. Should you have any questions please contact Xavier Pagan or Marjorie Bixby at (305) 470-5220.</p>	
<b>ENVIRONMENTAL PROTECTION - FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION</b>	
Memo attached outlining DEP concerns and requirements.	
<b>SOUTH FLORIDA WMD - SOUTH FLORIDA WATER MANAGEMENT DISTRICT</b>	
Letter faxed/mailed on 7/7/03	



# Florida

Department of Environmental Protection

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Project Comment Confirmation	
<b>Project:</b>	FL200306112523C
<b>Due Date:</b>	JULY 09, 2003
<b>Description:</b>	FEDERAL EMERGENCY MANAGEMENT AGENCY - HAZARD MITIGATION ASSISTANCE - DRAFT SUPPLEMENTAL ENVIRONMENTAL ASSESSMENT (SEA) FOR THE KEY LARGO WASTEWATER SYSTEM - MONROE COUNTY, FLORIDA.
<b>Keywords:</b>	FEMA - HAZARD MITIGATION - KEY LARGO WASTEWATER SYSTEM - MONROE COUNTY
<b>Program:</b>	83.519
<b>Comment:</b>	Memo attached outlining DEP concerns and requirements.
<b>Comment Type:</b>	FINAL
<b>Comment Saved Date:</b>	AUGUST 04, 2003

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For more information please contact the Clearinghouse Office at:

AGENCY CONTACT AND COORDINATOR (SCH)  
 3900 COMMONWEALTH BOULEVARD MS-47  
 TALLAHASSEE, FLORIDA 32399-3000  
 TELEPHONE: (850) 245-2161  
 FAX: (850) 245-2190

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COUNTY: MONROE - 2003-5190  
SAI - FEMA

DATE: 6/9/2003  
COMMENTS DUE DATE: 7/9/2003  
CLEARANCE DUE DATE: 8/8/2003  
SAI#: FL200306112523C

MESSAGE:

<b>STATE AGENCIES</b>	<b>WATER MNGMNT. DISTRICTS</b>	<b>OPB POLICY UNIT</b>	<b>RPCS &amp; LOC GOVS</b>
COMMUNITY AFFAIRS	SOUTH FLORIDA WMD	ENVIRONMENTAL POLICY UNIT	
ENVIRONMENTAL PROTECTION			
FISH and WILDLIFE COMMISSION			
HEALTH			
X STATE			
TRANSPORTATION			

The attached document requires a Coastal Zone Management Act/Florida Coastal Management Program consistency evaluation and is categorized as one of the following:

- X Federal Assistance to State or Local Government (15 CFR 930, Subpart F).  
Agencies are required to evaluate the consistency of the activity.
- Direct Federal Activity (15 CFR 930, Subpart C). Federal Agencies are required to furnish a consistency determination for the State's concurrence or objection.
- Outer Continental Shelf Exploration, Development or Production Activities (15 CFR 930, Subpart E). Operators are required to provide a consistency certification for state concurrence/objection.
- Federal Licensing or Permitting Activity (15 CFR 930, Subpart D). Such projects will only be evaluated for consistency when there is not an analogous state license or permit.

**Project Description:**

FEDERAL EMERGENCY MANAGEMENT AGENCY  
- HAZARD MITIGATION ASSISTANCE - DRAFT  
SUPPLEMENTAL ENVIRONMENTAL  
ASSESSMENT (SEA) FOR THE KEY LARGO  
WASTEWATER SYSTEM - MONROE COUNTY,  
FLORIDA.

**To: Florida State Clearinghouse**

AGENCY CONTACT AND COORDINATOR (SCH)  
3900 COMMONWEALTH BOULEVARD MS-47  
TALLAHASSEE, FLORIDA 32399-3000  
TELEPHONE: (850) 245-2161  
FAX: (850) 245-2190

**EO. 12372/NEPA Federal Consistency**

- No Comment
- Comment Attached
- Not Applicable
- No Comment/Consistent
- Consistent/Comments Attached
- Inconsistent/Comments Attached
- Not Applicable

**From:**

Division of Historical Resources  
Bureau of Historic Preservation

Division/Bureau: Bureau of Historic Preservation  
Reviewer: SARAH JALVINS JUL 7/13/03  
Date: 7/11/03

*Jessie Snyder Matthews*

02/39/5  
ROHA: 48MM  
NHPA

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COUNTY: MONROE

DATE: 6/9/2003

COMMENTS DUE DATE: 7/9/2003

CLEARANCE DUE DATE: 8/8/2003

SAI#: FL200306112523C

MESSAGE:

<b>STATE AGENCIES</b>	<b>WATER MNGMNT. DISTRICTS</b>	<b>OPB POLICY UNIT</b>	<b>RPCS &amp; LOC GOVS</b>
COMMUNITY AFFAIRS	SOUTH FLORIDA WMD	X ENVIRONMENTAL POLICY UNIT	
ENVIRONMENTAL PROTECTION			
FISH and WILDLIFE COMMISSION			
HEALTH			
STATE			
TRANSPORTATION			

The attached document requires a Coastal Zone Management Act/Florida Coastal Management Program consistency evaluation and is categorized as one of the following:

- Federal Assistance to State or Local Government (15 CFR 930, Subpart F).  
Agencies are required to evaluate the consistency of the activity.
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- Federal Licensing or Permitting Activity (15 CFR 930, Subpart D). Such projects will only be evaluated for consistency when there is not an analogous state license or permit.

**Project Description:**

FEDERAL EMERGENCY MANAGEMENT AGENCY  
 - HAZARD MITIGATION ASSISTANCE - DRAFT  
 SUPPLEMENTAL ENVIRONMENTAL  
 ASSESSMENT (SEA) FOR THE KEY LARGO  
 WASTEWATER SYSTEM - MONROE COUNTY,  
 FLORIDA.

**To: Florida State Clearinghouse**

AGENCY CONTACT AND COORDINATOR (SCH)  
 3900 COMMONWEALTH BOULEVARD MS-47  
 TALLAHASSEE, FLORIDA 32399-3000  
 TELEPHONE: (850) 245-2161  
 FAX: (850) 245-2190

**EO. 12372/NEPA Federal Consistency**

- No Comment
- No Comment/Consistent
- Comment Attached
- Consistent/Comments Attached
- Not Applicable
- Inconsistent/Comments Attached
- Not Applicable

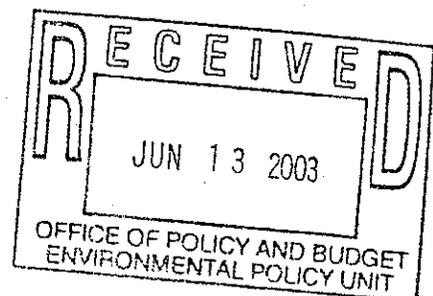
**From:**

Division/Bureau: OPB. Env.  
 Reviewer: M. Janner  
 Date: 7/8/03

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COUNTY: MONROE

DATE: 6/9/2003

COMMENTS DUE DATE: 7/9/2003

CLEARANCE DUE DATE: 8/8/2003

SAI#: FL200306112523C

BH

MESSAGE:

<b>STATE AGENCIES</b>	<b>WATER MNGMNT. DISTRICTS</b>	<b>OPB POLICY UNIT</b>	<b>RPCS &amp; LOC GOVS</b>
COMMUNITY AFFAIRS	SOUTH FLORIDA WMD	ENVIRONMENTAL POLICY UNIT	
ENVIRONMENTAL PROTECTION			
FISH and WILDLIFE COMMISSION			
X HEALTH			
STATE			
TRANSPORTATION			

The attached document requires a Coastal Zone Management Act/Florida Coastal Management Program consistency evaluation and is categorized as one of the following:

- X Federal Assistance to State or Local Government (15 CFR 930, Subpart F). Agencies are required to evaluate the consistency of the activity.
- \_ Direct Federal Activity (15 CFR 930, Subpart C). Federal Agencies are required to furnish a consistency determination for the State's concurrence or objection.
- \_ Outer Continental Shelf Exploration, Development or Production Activities (15 CFR 930, Subpart E). Operators are required to provide a consistency certification for state concurrence/objection.
- \_ Federal Licensing or Permitting Activity (15 CFR 930, Subpart D). Such projects will only be evaluated for consistency when there is not an analogous state license or permit.

**Project Description:**

FEDERAL EMERGENCY MANAGEMENT AGENCY  
 - HAZARD MITIGATION ASSISTANCE - DRAFT  
 SUPPLEMENTAL ENVIRONMENTAL  
 ASSESSMENT (SEA) FOR THE KEY LARGO  
 WASTEWATER SYSTEM - MONROE COUNTY,  
 FLORIDA.

*WWTTP EXPANSION*

To: Florida State Clearinghouse

EO. 12372/NEPA Federal Consistency

AGENCY CONTACT AND COORDINATOR (SCH)  
 3900 COMMONWEALTH BOULEVARD MS-47  
 TALLAHASSEE, FLORIDA 32399-3000  
 TELEPHONE: (850) 245-2161  
 FAX: (850) 245-2190

- No Comment
- No Comment/Consistent
- Comment Attached
- Consistent/Comments Attached
- Not Applicable
- Inconsistent/Comments Attached
- Not Applicable

HSES Onsite Sewage Programs

From:

Dale Holcomb

Division/Bureau: 6-23-2003

Reviewer: \_\_\_\_\_

Date: \_\_\_\_\_

RECEIVED

JUN 30 2003

OIP/OLGA



June 5, 2003

Teresa Tinker, Policy Coordinator  
Growth Management and Strategic Planning  
Office of the Governor  
1501 Capitol  
Tallahassee, FL 32399-0001

**Subject: Notice of Draft Supplemental Environmental Assessment (SEA) for  
the Key Largo Wastewater System, Monroe County, Florida.**

Dear Ms. Tinker:

This purpose of this letter is to provide your agency with notice that URS Group, Inc., on behalf of the Federal Emergency Management Agency (FEMA), is preparing a Draft Supplemental Environmental Assessment (SEA) for the Key Largo Wastewater System, Monroe County, Florida. The Draft SEA evaluates several wastewater management alternatives proposed for Key Largo, and the potential environmental consequences associated with those alternatives. At this time, FEMA requests your comments regarding the range of alternatives (attached). Please note that this attachment represents only a portion of the draft SEA. Additionally, a street map of the project vicinity has also been attached.

In 1998, during the aftermath of Hurricane Georges, Congress allocated additional monies for long-term disaster recovery projects in the State of Florida to assist counties whose needs were yet unmet through allocation of primary disaster relief funds. This Unmet Needs money was earmarked for the counties most impacted by Hurricane Georges, including Monroe County. Monroe County requested that wastewater management improvement projects be considered for disaster funding since many existing wastewater facilities do not provide adequate collection, treatment, or disposal, and thus contribute to degrading water quality in the Florida Keys. Since then, FEMA has received a grant application from the Florida Keys Aqueduct Authority requesting Federal assistance to upgrade the current wastewater treatment facilities on Key Largo.

The National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR Parts 1500 through 1508), and FEMA regulations for NEPA compliance (44 CFR Part 10) direct FEMA and other Federal agencies to fully understand and take into consideration during decision making, the environmental consequences of proposed Federal actions (projects). Therefore, FEMA must comply with NEPA, and other applicable Federal laws and regulations,

URS Corporation  
Eastern Financial Building, Suite 1000  
700 South Royal Poinciana Boulevard  
Miami Springs, FL 33166  
Tel: 305.884.8900  
Fax: 305.884.2665



Teresa Tinker, Policy Coordinator  
Growth Management and Strategic Planning  
June 5, 2003  
Page 2 of 2

before making Federal funds available for any disaster recovery and mitigation actions. A Programmatic Environmental Assessment (PEA) for Wastewater Management Improvements in the Florida Keys was prepared in accordance with these regulations, and provides a framework to address impacts of a range of wastewater treatment projects in the Florida Keys. In accordance with 40 CFR Part 1508.28, the Draft SEA for Key Largo tiers from the PEA, and addresses issues specific to this project location.

FEMA respectfully seeks your written comments within 30 days to the letterhead address. If you have any questions or comments, please do not hesitate to contact me at (305) 884-8900, or Ms. Science Kilner, FEMA Lead Environmental Specialist, at (770) 220-5357. Thank you very much for your assistance. Your comments will be considered during the Draft SEA preparation process.

Sincerely,

URS Group, Inc.

A handwritten signature in black ink, appearing to read 'R. Mendieta', written over a horizontal line.

Ramon Mendieta  
Environmental Scientist

Attachments as noted

cc: Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Stephen Carruth, URS Group, Inc., Environmental Planner



June 5, 2003

Rebecca Jetton  
Planning Manager  
Marathon Regional Service Center  
2796 Overseas Highway, Suite 212  
Marathon, FL 33050

**Subject: Notice of Draft Supplemental Environmental Assessment (SEA) for the Key Largo Wastewater System, Monroe County, Florida.**

Dear Ms. Jetton:

This purpose of this letter is to provide your agency with notice that URS Group, Inc., on behalf of the Federal Emergency Management Agency (FEMA), is preparing a Draft Supplemental Environmental Assessment (SEA) for the Key Largo Wastewater System, Monroe County, Florida. The Draft SEA evaluates several wastewater management alternatives proposed for Key Largo, and the potential environmental consequences associated with those alternatives. At this time, FEMA requests your comments regarding the range of alternatives (attached). Please note that this attachment represents only a portion of the draft SEA. Additionally, a street map of the project vicinity has also been attached.

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The National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR Parts 1500 through 1508), and FEMA regulations for NEPA compliance (44 CFR Part 10) direct FEMA and other Federal agencies to fully understand and take into consideration during decision making, the environmental consequences of proposed Federal actions (projects). Therefore, FEMA must comply with NEPA, and other applicable Federal laws and regulations,

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Fax: 305.884.2665



Rebecca Jetton  
Planning Manager  
June 5, 2003  
Page 2 of 2

before making Federal funds available for any disaster recovery and mitigation actions. A Programmatic Environmental Assessment (PEA) for Wastewater Management Improvements in the Florida Keys was prepared in accordance with these regulations, and provides a framework to address impacts of a range of wastewater treatment projects in the Florida Keys. In accordance with 40 CFR Part 1508.28, the Draft SEA for Key Largo tiers from the PEA, and addresses issues specific to this project location.

FEMA respectfully seeks your written comments within 30 days to the letterhead address. If you have any questions or comments, please do not hesitate to contact me at (305) 884-8900, or Ms. Science Kilner, FEMA Lead Environmental Specialist, at (770) 220-5357. Thank you very much for your assistance. Your comments will be considered during the Draft SEA preparation process.

Sincerely,

URS Group, Inc.

Ramon Mendieta  
Environmental Scientist

Attachments as noted

cc: Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Stephen Carruth, URS Group, Inc., Environmental Planner



June 5, 2003

Tim McGarry  
Monroe County Growth Management Director  
2798 Overseas Highway  
Marathon, FL 33052

**Subject: Notice of Draft Supplemental Environmental Assessment (SEA) for  
the Key Largo Wastewater System, Monroe County, Florida.**

Dear Mr. McGarry:

This purpose of this letter is to provide your agency with notice that URS Group, Inc., on behalf of the Federal Emergency Management Agency (FEMA), is preparing a Draft Supplemental Environmental Assessment (SEA) for the Key Largo Wastewater System, Monroe County, Florida. The Draft SEA evaluates several wastewater management alternatives proposed for Key Largo, and the potential environmental consequences associated with those alternatives. At this time, FEMA requests your comments regarding the range of alternatives (attached). Please note that this attachment represents only a portion of the draft SEA. Additionally, a street map of the project vicinity has also been attached.

In 1998, during the aftermath of Hurricane Georges, Congress allocated additional monies for long-term disaster recovery projects in the State of Florida to assist counties whose needs were yet unmet through allocation of primary disaster relief funds. This Unmet Needs money was earmarked for the counties most impacted by Hurricane Georges, including Monroe County. Monroe County requested that wastewater management improvement projects be considered for disaster funding since many existing wastewater facilities do not provide adequate collection, treatment, or disposal, and thus contribute to degrading water quality in the Florida Keys. Since then, FEMA has received a grant application from the Florida Keys Aqueduct Authority requesting Federal assistance to upgrade the current wastewater treatment facilities on Key Largo.

The National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR Parts 1500 through 1508), and FEMA regulations for NEPA compliance (44 CFR Part 10) direct FEMA and other Federal agencies to fully understand and take into consideration during decision making, the environmental consequences of proposed Federal actions (projects). Therefore, FEMA must comply with NEPA, and other applicable Federal laws and regulations, before making Federal funds available for any disaster recovery and mitigation actions.

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700 South Royal Poinciana Boulevard  
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Tim McGarry  
Monroe County Growth Management Director  
June 5, 2003  
Page 2 of 2

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FEMA respectfully seeks your written comments within 30 days to the letterhead address. If you have any questions or comments, please do not hesitate to contact me at (305) 884-8900, or Ms. Science Kilner, FEMA Lead Environmental Specialist, at (770) 220-5357. Thank you very much for your assistance. Your comments will be considered during the Draft SEA preparation process.

Sincerely,

URS Group, Inc.

A handwritten signature in black ink, appearing to read 'R. Mendieta'.

Ramon Mendieta  
Environmental Scientist

Attachments as noted

cc: Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Stephen Carruth, URS Group, Inc., Environmental Planner



June 5, 2003

Ms. Jocelyn Karazsia  
National Marine Fisheries Service  
Division of Habitat Conservation  
11420 N. Kendall Drive, Suite 103  
Miami, Florida 33176

**RE: NEPA Notice of Draft Supplemental Environmental Assessment (SEA); ESA Section 7 Informal Consultation Request; and MSFCMA Consultation Request for the Key Largo Wastewater System, Monroe County, Florida**

Dear Ms. Karazsia:

The purpose of this letter is to provide your agency with notice that URS Group, Inc. (URS), on behalf of the Federal Emergency Management Agency (FEMA), is preparing a Draft Supplemental Environmental Assessment (SEA); pursuant to the National Environmental Policy Act; for the Key Largo Wastewater System, Monroe County, Florida. The Draft SEA evaluates three wastewater management alternatives proposed for Key Largo: No Action (Alternative 1); Centralized Wastewater Treatment Plant located on Key Largo (Alternative 2); and New Wastewater Transmission System Construction (Alternative 3). At this time, FEMA requests your concurrence with their findings of no effect in compliance with Section 7 of the Endangered Species Act, and the Essential Fish Habitat (EFH) provisions of the Magnuson-Stevens Fishery Conservation and Management Act for the three alternatives under review.

FEMA is considering funding an application from the Florida Keys Aqueduct Authority (FKAA) to construct a wastewater treatment system that would serve residents of two communities located on Key Largo in the Florida Keys. The purpose of the FKAA project is to reduce wastewater nutrient loading at selected Monroe County-identified "hot spots" to improve water quality; these "hot spots" are believed to contribute to water quality degradation. The Monroe County Sanitary Wastewater Master Plan ranked Key Largo Trailer Village as the 4<sup>th</sup> most critical "hot spot" in the Florida Keys. The "hot spot" ranking is linked to the use of cesspools and septic systems as Key Largo Trailer Village's main wastewater treatment systems. FEMA would provide funding assistance to the FKAA as part of their effort to assist residents of Key Largo Trailer Village and Key Largo Park in meeting the Florida Statutory Treatment Standards of 2010 for wastewater effluent disposal to shallow wells. A description of the range of alternatives for the proposed wastewater treatment system is attached. Please note that this attachment represents only a portion of the draft SEA. Additionally, a street map of the

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Fax: 305.884.2665



Ms. Jocelyn Karazsia  
National Marine Fisheries Service  
June 5, 2003  
Page 2 of 4

project vicinity has also been attached. Your comments on the range of alternatives will be considered and incorporated into the final SEA document, which is slated for completion later this year.

Current lists of special status species with the potential to occur in Monroe County were obtained from "Threatened and Endangered Species Software (TESS), Version 2.0," from the U.S. Fish and Wildlife Service (FWS) Threatened and Endangered Species Internet site (<http://endangered.fws.gov/>), as well as the internet sites for the Gulf of Mexico Fishery Management Council (<http://www.gulfcouncil.org/>) and the South Atlantic Fishery Management Council (<http://www.safmc.net/>).

On October 25, 2000 a Biological Assessment (BA) of the preferred site was prepared by URS. On March 24, 2003, URS biologists Ramon Mendieta and Michael Breiner performed reconnaissance level field surveys at the alternate site. The purpose of the BA and the survey was to investigate the potential presence of federally protected species and/or suitable habitat for these species at each of the sites. The following sites were investigated:

- **Preferred Site for Construction of a New Treatment Plant – Wastewater Treatment Plant (WWTP) Preferred Site** located on the oceanside (east) of US Route 1 (US-1) near mile marker (MM) 100.5; and
- **Alternate Site for a Vacuum Pump Station, and Corridor for Construction of a New Transmission System to a New Treatment Plant – Alternate Site** for a vacuum pump station, located on the oceanside (east) of US-1 at approximately MM 100.5; an approximately 2.5-mile corridor for wastewater transmission system that would be constructed along the east side of the US-1 right-of-way (ROW); and a new WWTP located on the oceanside of US-1 near MM 98.0.

Under Alternatives 2, no marine resources, tidal wetlands or other potential EFH typically occur within 150 feet of the proposed site. Under Alternative 3, the proposed WWTP site is located adjacent to the Straits of Florida. The site is completed developed; tidal wetlands or other potential EFH were not observed on site. Neither construction nor operation of either alternative would affect EFH. Further, as described in Section 3.3 (Biological Resources) and Section 3.6.2 (Fishing Industry) of the Programmatic Environmental Assessment for Wastewater Improvements in the Florida Keys, implementation of the either alternative is expected to improve nearshore water quality, by reducing nutrient loading. Seagrasses, mangroves and hardbottom habitats serve as



Ms. Jocelyn Karazsia  
National Marine Fisheries Service  
June 5, 2003  
Page 3 of 4

critical nursery habitat for commercially significant fisheries species as well as several Federal and state-listed marine species. Their health is dependent to a large degree on water quality. Therefore, the implementation of the either alternative is expected to have a net positive effect on EFH as well as Federally-listed marine species.

In order to further ensure that EFH is not affected, FCAA would employ best management practices (BMPs) to prevent concrete, steel and other demolition debris, waste, and construction material from entering tidal wetlands and/or marine waters. These measures may include the deployment of silt screens, turbidity curtains, or other barriers prior to commencement of construction.

All equipment operating in the project area would be regularly cleaned, checked for leaks, and otherwise maintained. Equipment refueling would be done away from marine waters, and, in the unlikely event that a fuel leak or spill were to occur, adequate containment equipment and cleanup (absorbent material) supplies would be readily available at the worksite.

No species listed for protection at the State or Federal levels were observed in either of the proposed areas alternative sites. Based on the results of the biological field visit, consultation with experts, and a review of special status species lists, FEMA finds that the proposed alternatives would not result in the take of threatened or endangered species or species protected under the Migratory Bird Treaty Act (MBTA), jeopardize the continued existence of these species, or adversely affect their habitat.

As part of the informal consultation process, FEMA respectfully seeks written concurrence with this determination of no effect within 30 days to the letterhead address. If you have any questions or comments, please do not hesitate to contact me at (305) 884-8900, or Ms. Science Kilner, FEMA Lead Environmental Specialist, at (770) 220-5357. Thank you very much for your assistance.

Sincerely,

URS Group, Inc.

Ramon Mendieta  
Environmental Scientist



Ms. Jocelyn Karazsia  
National Marine Fisheries Service  
June 5, 2003  
Page 4 of 4

---

Attachments as noted

cc: Rickey N. Ruebsamen, NMFS Southeast Region  
Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Stephen Carruth, URS Group, Inc., Environmental Planner



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office  
9721 Executive Center Drive North  
St. Petersburg, Florida 33702

June 24, 2003

Mr. Ramon Mendieta  
URS Corporation  
Eastern Financial Building, Suite 1000  
700 South Royal Poinciana Boulevard  
Miami Springs, Florida 33166

Dear Mr. Mendieta:

The National Marine Fisheries Service (NOAA Fisheries) has reviewed the June 5, 2003, **Notice of Draft Supplemental Environmental Assessment (SEA) for the Key Largo Wastewater System, Monroe County, Florida**, which you provided. By letter dated February 18, 2003, to the Federal Emergency Management Agency (FEMA), we provided comments on the September 20, 2002, Draft Programmatic Environmental Assessment (PEA) for the Proposed Wastewater Treatment Improvements in the Florida Keys, Florida. In addition, by letters dated February 27, 2003, March 17, 2003, and May 29, 2003, to URS Corporation, NOAA Fisheries provided comments on the Draft Supplemental Environmental Assessments for the Conch Key, the Plantation Key, and the Bay Point Saddlebunch Key Wastewater Systems, respectively, in Monroe County, Florida.

According to the information you provided, URS Group, Inc., on behalf of FEMA, is preparing a SEA for the Key Largo Wastewater System in Monroe County, Florida. FEMA is considering funding an application from the Florida Keys Aqueduct Authority (FKAA) to construct a wastewater treatment system that would serve residents of two communities on Key Largo in the Florida Keys. The purpose of the FKAA's project is to reduce wastewater nutrient loading at selected Monroe County identified "hot spots," thereby improving water quality. These hot spots are believed to contribute to water quality degradation. The Monroe County Sanitary Wastewater Master Plan ranked Key Largo as the 4<sup>th</sup> most critical hot spot in the Florida Keys. The hot spot ranking is linked to the use of cesspools and septic systems as Key Largo Trailer Village's principal means for wastewater treatment.

The Draft SEA evaluates three wastewater management alternatives proposed for Key Largo. These alternatives include, Alternative 1: No Action; Alternative 2: Centralized Wastewater Treatment Plant located on the Northern Side; and Alternative 3: New Wastewater Treatment Plant on the Southern Side. These three alternatives are briefly described below.



The No Action Alternative would not provide funding assistance to the FKAA for the proposed wastewater management project. In order to meet the Florida Statutory Treatment Standards of 2010, the FKAA and service area, residents would need to identify another source of funding for upgrading currently inadequate wastewater treatment systems.

The New Wastewater Treatment Plant on the Northern Site (Alternative 2 and the Preferred Alternative) would involve construction of a new wastewater collection system, vacuum pump station, and wastewater treatment plant (WWTP) that would be located on Key Largo. This alternative would be designed to meet the Florida Statutory Treatment Standards of 2010, for effluent disposal to shallow injection wells. The new system would service about 500 land parcels, or about 1,000 people, within the service area. Through this alternative, approximately 467 cesspools and septic systems would be removed from property owners in the service area.

The New Wastewater Treatment Plant on the Southern Side (Alternative 3) would involve construction of a vacuum pump station and a wastewater transmission system extending from the vacuum pump station to a new community WWTP. Like Alternative 2, approximately 467 cesspools and septic systems would be removed from property owners in the service area.

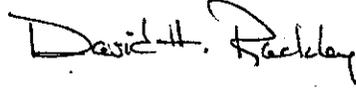
According to the information provided, no marine resources, tidal wetlands or other potential Essential Fish Habitat (EFH) exist within 150 feet of the proposed site of Alternative 2. Under Alternative 3, the proposed WWTP is located adjacent to the Straights of Florida. The site is completely developed and tidal wetlands or other EFH were not observed at the site. Neither construction or operation of either Alternative 2 or 3, would affect EFH. Furthermore, Alternatives 2 and 3 are expected to improve nearshore water quality by reducing nutrient loading. Through execution of either alternative, a net positive effect on EFH is expected, given that the health of seagrass, mangrove, and hardbottom habitats is dependent, to a large degree, on water quality. In addition, the FKAA would employ best management practices, as outlined in the information provided, to further ensure that EFH is not affected.

NOAA Fisheries concurs with the determination that construction of a Key Largo Wastewater System would have a beneficial effect with regard to EFH. Nearshore marine habitats including seagrass communities and coral reefs are likely to benefit as a result of reductions in total suspended solids, nutrients, and pathogens that are expected in connection with wastewater improvement activities.

In conclusion, NOAA Fisheries supports improvement of the existing wastewater treatment facilities Keys-wide, including the proposed improvements at Key Largo. Reducing nutrient loading into nearshore waters from outdated septic systems and cesspits should result in improved water quality and positive effects on EFH and other NOAA Fisheries-trust resources in the Florida Keys.

At this time, we do not have specific comments or recommendations to provide. We look forward to working with FEMA and URS, Inc., as you develop more detailed information. If we can be of further assistance, please advise. Related comments, questions or correspondence should be directed to Ms. Jocelyn Karazsia in Miami, Florida, at (305) 595-8352.

Sincerely,



Frederick C. Sutter III  
Deputy Regional Administrator

cc:  
EPA, Marathon  
DEP, Marathon  
FFWCC, Tallahassee  
FWS, Big Pine Key  
F/SER4  
F/SER45-Karazsia



November 20, 2003

Ms. Jocelyn Karazsia  
National Marine Fisheries Service  
Division of Habitat Conservation  
11420 N. Kendall Drive, Suite 103  
Miami, Florida 33176

**Subject: Notice of Availability of the Draft Supplemental Environmental Assessment (SEA) of Proposed Wastewater Treatment Improvements for Key Largo in the Florida Keys, Florida.**

Dear Ms. Karazsia:

On behalf of the Federal Emergency Management Agency (FEMA), URS Group, Inc. is providing your agency with a compact disk copy of the Draft Supplemental Environmental Assessment (SEA) for Wastewater Treatment Improvements in Key Largo, Monroe County, Florida. The SEA evaluates the impacts of constructing wastewater treatment facilities in the community of Key Largo. A separate, initial letter outlining FEMA's intent to prepare the Draft SEA for this project was transmitted to your agency on June 5, 2003. On June 24, 2003, your office replied that the project is expected to have a beneficial effect with regard to Essential Fish Habitat. At this time, FEMA welcomes additional comments your agency may have to the entire document, which is provided on the enclosed CD.

A public meeting on the Draft SEA will be held for the Key Largo Project on December 3, 2003. The public review period for the Key Largo Draft SEA is from November 21 to December 19, 2003.

### **Background**

In 1998, during the aftermath of Hurricane Georges, Congress allocated additional monies for long-term disaster recovery projects in the State of Florida to assist counties whose needs were yet unmet through allocation of primary disaster relief funds. This Unmet Needs money was earmarked for the counties most impacted by Hurricane Georges, including Monroe County. Monroe County, Florida requested that wastewater management improvement projects be considered for disaster funding since many existing wastewater facilities in Monroe County do not provide adequate collection, treatment, or disposal, and thus contribute greatly to degraded water quality in the Florida Keys. Since then, FEMA has received grant applications from several Monroe County communities to upgrade their current wastewater treatment facilities.

The National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR Parts 1500 through 1508), and FEMA

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200 Orchard Ridge Drive, Suite 101  
Gaithersburg, MD 20878  
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Ms. Jocelyn Karazsia  
National Marine Fisheries Service  
November 20th, 2003  
Page 2

regulations for NEPA compliance (44 CFR Part 10) direct FEMA and other federal agencies to fully understand and take into consideration during decision making, the environmental consequences of proposed federal actions (projects). Therefore, FEMA must comply with NEPA, and other applicable federal laws and regulations, before making federal funds available for disaster recovery and mitigation actions. FEMA prepared a Programmatic Environmental Assessment (PEA) and reached a Programmatic Finding of No Significant Impact (PFONSI) on December 23, 2002, which was previously submitted to your office for review. This SEA tiers from that document.

### Submitting Comments

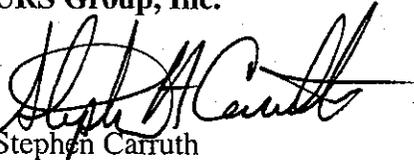
Please submit your comments on the Draft SEA in writing to Ms. Science Kilner, Lead Environmental Specialist, FEMA Region IV within 15 days of the receipt of this letter. Ms. Kilner's contact information is:

FEMA Region IV – Federal Insurance and Mitigation Division  
3003 Chamblee-Tucker Road  
Atlanta, GA 30341  
Fax: (770) 220-5440

Your comments will be considered during the Final SEA preparation process. Thank you for your involvement in this documentation process.

Sincerely,

URS Group, Inc.



Stephen Carruth  
Project Environmental Scientist

Attachments



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL MARINE FISHERIES SERVICE

Southeast Regional Office  
9721 Executive Center Drive North  
St. Petersburg, Florida 33702

December 19, 2003

Ms. Science Kilner  
FEMA Region IV  
Federal Insurance and Mitigation Division  
3003 Chamblee-Tucker Road  
Atlanta, GA 30341

Dear Ms. Kilner:

The National Marine Fisheries Service (NOAA Fisheries) has reviewed the November 20, 2003, Draft Supplemental Environmental Assessment (DSEA) for Proposed Wastewater Treatment Improvements for Key Largo in the Florida Keys, Monroe County, Florida, which you provided. By letter dated June 20, 2003, we provided comments on the Notice of Draft Supplemental Environmental Assessment (DSEA) for the Key Largo Wastewater System, Monroe County, Florida. We also provided comments on the September 20, 2002, Draft Programmatic Environmental Assessment (DPEA) for the Proposed Wastewater Treatment Improvements in the Florida Keys, Florida.

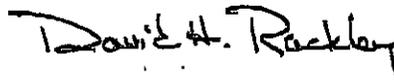
NOAA Fisheries concurs with the determination that construction of a Key Largo Wastewater System is expected to have a beneficial effect with regard to Essential Fish Habitat (EFH). Nearshore marine habitats including seagrass communities and coral reefs are likely to benefit as a result of reductions in total suspended solids, nutrients, and pathogens that are discharged in connection with wastewater treatment activities.

In conclusion, NOAA Fisheries supports improvement of the existing wastewater treatment facilities Keys-wide, including the proposed improvements at Key Largo. Reducing nutrient loading into nearshore waters from outdated septic systems and cesspits should result in improved water quality and positive effects on EFH and other NOAA Fisheries-trust resources in the Florida Keys. Therefore, the actions to be implemented largely address NOAA Fisheries' recommendations and the intent and procedural requirements of the Magnuson-Stevens Fishery Conservation and Management Act and the regulations for implementing the EFH requirements of the Act have been met.



We sincerely appreciate efforts by FEMA to protect Florida's living marine resources. Related correspondence should be addressed to the attention of Ms. Jocelyn Karazsia at our Miami Office. She may be reached at 11420 North Kendall Drive, Suite #103, Miami, Florida 33176, or by telephone at (305) 595-8352.

Sincerely,



Miles M. Croom  
Assistant Regional Administrator  
Habitat Conservation Division

cc:  
EPA, Marathon  
DEP, Marathon  
FFWCC, Tallahassee  
FWS, Vero Beach  
F/SER4  
F/SER45-Karazsia  
F/SER43-Ruebsamen



June 5, 2003

Georgia Cranmore, Acting Assistant Regional Administrator  
NMFS, Southeast Region  
Protective Resources Division  
9721 Executive Center Drive North  
St. Petersburg, FL 33702

**RE: NEPA Notice of Draft Supplemental Environmental Assessment (SEA); ESA Section 7 Informal Consultation Request; and MSFCMA Consultation Request for the Key Largo Wastewater System, Monroe County, Florida**

Dear Ms. Cranmore:

The purpose of this letter is to provide your agency with notice that URS Group, Inc. (URS), on behalf of the Federal Emergency Management Agency (FEMA), is preparing a Draft Supplemental Environmental Assessment (SEA); pursuant to the National Environmental Policy Act; for the Key Largo Wastewater System, Monroe County, Florida. The Draft SEA evaluates three wastewater management alternatives proposed for Key Largo: No Action (Alternative 1); Centralized Wastewater Treatment Plant located on Key Largo (Alternative 2); and New Wastewater Transmission System Construction (Alternative 3). At this time, FEMA requests your concurrence with their findings of no effect in compliance with Section 7 of the Endangered Species Act, and the Essential Fish Habitat (EFH) provisions of the Magnuson-Stevens Fishery Conservation and Management Act for the three alternatives under review.

FEMA is considering funding an application from the Florida Keys Aqueduct Authority (FKAA) to construct a wastewater treatment system that would serve residents of two communities located on Key Largo in the Florida Keys. The purpose of the FKAA project is to reduce wastewater nutrient loading at selected Monroe County-identified "hot spots" to improve water quality; these "hot spots" are believed to contribute to water quality degradation. The Monroe County Sanitary Wastewater Master Plan ranked Key Largo Trailer Village as the 4<sup>th</sup> most critical "hot spot" in the Florida Keys. The "hot spot" ranking is linked to the use of cesspools and septic systems as Key Largo Trailer Village's main wastewater treatment systems. FEMA would provide funding assistance to the FKAA as part of their effort to assist residents of Key Largo Trailer Village and Key Largo Park in meeting the Florida Statutory Treatment Standards of 2010 for wastewater effluent disposal to shallow wells. A description of the range of alternatives for the proposed wastewater treatment system is attached. Please note that this attachment represents only a portion of the draft SEA. Additionally, a street map of the

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Miami Springs, FL 33166  
Tel: 305.884.8900  
Fax: 305.884.2665



Georgia Cranmore  
NMFS, Southeast Region  
June 5, 2003  
Page 2 of 4

project vicinity has also been attached. Your comments on the range of alternatives will be considered and incorporated into the final SEA document, which is slated for completion later this year.

Current lists of special status species with the potential to occur in Monroe County were obtained from "Threatened and Endangered Species Software (TESS), Version 2.0," from the U.S. Fish and Wildlife Service (FWS) Threatened and Endangered Species Internet site (<http://endangered.fws.gov/>), as well as the internet sites for the Gulf of Mexico Fishery Management Council (<http://www.gulfcouncil.org/>) and the South Atlantic Fishery Management Council (<http://www.safmc.net/>).

On October 25, 2000 a Biological Assessment (BA) of the preferred site was prepared by URS. On March 24, 2003, URS biologists Ramon Mendieta and Michael Breiner performed reconnaissance level field surveys at the alternate site. The purpose of the BA and the survey was to investigate the potential presence of federally protected species and/or suitable habitat for these species at each of the sites. The following sites were investigated:

- **Preferred Site for Construction of a New Treatment Plant – Wastewater Treatment Plant (WWTP) Preferred Site** located on the oceanside (east) of US Route 1 (US-1) near mile marker (MM) 100.5; and
- **Alternate Site for a Vacuum Pump Station, and Corridor for Construction of a New Transmission System to a New Treatment Plant – Alternate Site** for a vacuum pump station, located on the oceanside (east) of US-1 at approximately MM 100.5; an approximately 2.5-mile corridor for wastewater transmission system that would be constructed along the east side of the US-1 right-of-way (ROW); and a new WWTP located on the oceanside of US-1 near MM 98.0.

Under Alternatives 2, no marine resources, tidal wetlands or other potential EFH typically occur within 150 feet of the proposed site. Under Alternative 3, the proposed WWTP site is located adjacent to the Straits of Florida. The site is completely developed; tidal wetlands or other potential EFH were not observed on site. Neither construction nor operation of either alternative would affect EFH. Further, as described in Section 3.3 (Biological Resources) and Section 3.6.2 (Fishing Industry) of the Programmatic Environmental Assessment for Wastewater Improvements in the Florida Keys, implementation of either alternative is expected to improve nearshore water quality, by reducing nutrient loading. Seagrasses, mangroves and hardbottom habitats serve as



Georgia Cranmore  
NMFS, Southeast Region  
June 5, 2003  
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critical nursery habitat for commercially significant fisheries species as well as several Federal and state-listed marine species. Their health is dependent to a large degree on water quality. Therefore, the implementation of the either alternative is expected to have a net positive effect on EFH as well as Federally-listed marine species.

In order to further ensure that EFH is not affected, FKAA would employ best management practices (BMPs) to prevent concrete, steel and other demolition debris, waste, and construction material from entering tidal wetlands and/or marine waters. These measures may include the deployment of silt screens, turbidity curtains, or other barriers prior to commencement of construction.

All equipment operating in the project area would be regularly cleaned, checked for leaks, and otherwise maintained. Equipment refueling would be done away from marine waters, and, in the unlikely event that a fuel leak or spill were to occur, adequate containment equipment and cleanup (absorbent material) supplies would be readily available at the worksite.

No species listed for protection at the State or Federal levels were observed in either of the proposed areas alternative sites. Based on the results of the biological field visit, consultation with experts, and a review of special status species lists, FEMA finds that the proposed alternatives would not result in the take of threatened or endangered species or species protected under the Migratory Bird Treaty Act (MBTA), jeopardize the continued existence of these species, or adversely affect their habitat.

As part of the informal consultation process, FEMA respectfully seeks written concurrence with this determination of no effect within 30 days to the letterhead address. If you have any questions or comments, please do not hesitate to contact me at (305) 884-8900, or Ms. Science Kilner, FEMA Lead Environmental Specialist, at (770) 220-5357. Thank you very much for your assistance.

Sincerely,

URS Group, Inc.

Ramon Merdieta  
Environmental Scientist



Georgia Cranmore  
NMFS, Southeast Region  
June 5, 2003  
Page 4 of 4

---

Attachments as noted

cc:

Rickey N. Ruebsamen, NMFS Southeast Region  
Ms. Jocelyn Karazsia, NMFS  
Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Stephen Carruth, URS Group, Inc., Environmental Planner



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL MARINE FISHERIES SERVICE  
Southeast Regional Office  
9721 Executive Center Drive North  
St. Petersburg, FL 33702  
(727) 570-5312; Fax 570-5517  
<http://caldera.sero.nmfs.gov>

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F/SER3:DK

Ramon Mendieta  
Environmental Scientist  
URS Corporation  
Eastern Financial Building, Suite 1000  
Miami Springs, FL 33166

Dear Mr. Mendieta:

This correspondence is in reply to your June 5, 2003, letter on behalf of the Federal Emergency Management Agency (FEMA), and accompanying information, regarding the proposed Key Largo Wastewater System. FEMA has requested section 7 consultation from the National Marine Fisheries Service (NOAA Fisheries), pursuant to the Endangered Species Act of 1973 (ESA). The proposed action is FEMA funding of an application from the Florida Keys Aqueduct Authority (FKAA) to construct and operate a wastewater treatment system that would serve residents of two communities located on Key Largo in the Florida Keys. The NOAA Fisheries' consultation number for this project is I/SER/2003/00773; please refer to this number in future correspondence on this project.

The proposed action is FEMA authorization and funding assistance for a wastewater treatment plant to be constructed and operated by FKAA. This plant would serve two communities on Key Largo that are currently using cesspools and septic tanks, and have been identified as "hot spots" believed to contribute to water quality degradation in the area. With the treatment plant, the wastewater would be treated to meet the Florida Statutory Treatment Standards of 2010 for wastewater effluent disposal to shallow wells. There are two alternative sites analyzed for the treatment plant in Key Largo. The preferred site is on the oceanside (east) of US Route 1 (US-1) near mile marker (MM) 100.5, in a hardwood hammock area. The alternate site would have the vacuum pump station at the same area as the preferred site, connected via pipeline along US-1 with the treatment plant located on the east side of US-1 near MM 98.0 in an area that is already developed.

ESA-listed species under the purview of NOAA Fisheries which potentially occur in the vicinity of the project area include: the green (*Chelonia mydas*), loggerhead (*Caretta caretta*), Kemp's ridley (*Lepidochelys kempii*), leatherback (*Dermochelys coriacea*), and hawksbill (*Eretmochelys imbricata*) sea turtles; the smalltooth sawfish (*Pristis pectinata*); and the fin (*Balaenoptera physalus*), humpback (*Megaptera novaeangliae*), sei (*Balaenoptera borealis*), blue (*Balaenoptera musculus*), and sperm (*Physeter macrocephalus*) whales; and the smalltooth sawfish (*Pristis pectinata*). No critical habitat has been designated or proposed for listed species within the project area.

Construction of either one of the two alternatives will not occur in or over marine ecosystems. In addition, FKAA will employ best management practices (BMPs) to prevent concrete, steel, and any other debris or waste related to construction from entering any tidal wetlands or marine systems, and to keep construction machinery clean and free from leaking oil. Treated wastewater will be pumped into shallow



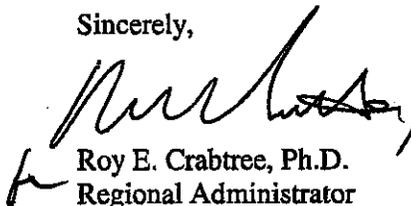
disposal wells. This project, when complete, will serve to improve water quality in an area that currently treats its sewage through the use of septic tanks and cesspools, and will, therefore, have a net benefit to marine ecosystems in the area. NOAA Fisheries, therefore, believes that the proposed action is not likely to adversely affect any listed species or designated critical habitat under our purview.

This letter concludes FEMA's consultation responsibilities under section 7 of the ESA for the proposed action for federally-listed species, and their critical habitat, under NOAA Fisheries' purview. Be advised that a new consultation must be initiated if a take occurs or new information reveals effects of the action not previously considered, or the identified action is subsequently modified in a manner that causes an effect to the listed species or critical habitat in a manner or to an extent not previously considered, or if a new species is listed or critical habitat is designated that may be affected by the identified action.

The action agency is also reminded that, in addition to its protected species/critical habitat consultation requirements with NOAA Fisheries' Protected Resources Division pursuant to section 7 of the ESA, prior to proceeding with the proposed action the action agency must also consult with NOAA Fisheries' Habitat Conservation Division (HCD) pursuant to the Magnuson-Stevens Fishery Conservation and Management Act's requirements for essential fish habitat (EFH) consultation (16 U.S.C. 1855 (b)(2) and 50 CFR 600.905-.930, subpart K). The action agency should also understand the ESA and EFH processes; that ESA and EFH consultations are separate, distinct, and guided by different statutes, goals, and time lines for responding to the action agency; and that the action agency will receive separate consultation correspondence on NOAA Fisheries letterhead from HCD regarding their concerns and/or finalizing EFH consultation. Consultation is not complete until EFH and ESA concerns have been addressed.

If you have any questions about EFH consultation for this project, please contact Ms. Jocelyn Karazsia, HCD, at (305) 595-8352. If you have any questions about this ESA consultation, please contact Dennis Klemm, fishery biologist, at the number above or by e-mail at [Dennis.Klemm@noaa.gov](mailto:Dennis.Klemm@noaa.gov).

Sincerely,



Roy E. Crabtree, Ph.D.  
Regional Administrator

cc: F/PR3  
F/SER43-Karazsia

File: 1514-22 O.3 FL.  
O:\section 7\informal\00773 Key Largo Wastewater System.wpd



November 20, 2003

Georgia Cranmore  
Acting Assistant Regional Administrator  
NMFS, Southeast Region  
Protective Resources Division  
9721 Executive Center Drive North  
St. Petersburg, Florida 33702

**Subject: Notice of Availability of the Draft Supplemental Environmental Assessment (SEA) of Proposed Wastewater Treatment Improvements for Key Largo in the Florida Keys, Florida.**

Dear Ms. Cranmore:

On behalf of the Federal Emergency Management Agency (FEMA), URS Group, Inc. is providing your agency with a compact disk copy of the Draft Supplemental Environmental Assessment (SEA) for Wastewater Treatment Improvements in Key Largo, Monroe County, Florida. The SEA evaluates the impacts of constructing wastewater treatment facilities in the community of Key Largo. A separate, initial letter outlining FEMA's intent to prepare the Draft SEA, along with a request for informal Endangered Species Act (ESA) consultation for this project, was transmitted to your agency on June 5, 2003. On November 19, 2003, your office replied that the project would not likely adversely affect any listed species or critical habitat protected by the ESA under the National Marine Fishery Service (NMFS) purview. The Draft SEA incorporates the ESA consultation, and at this time, FEMA welcomes additional comments your agency may have to the entire document, which is provided on the enclosed CD.

A public meeting on the Draft SEAs will be held for the Key Largo Project on December 3, 2003. The public review period for the Key Largo Draft SEA is from November 21 to December 19, 2003.

### **Background**

In 1998, during the aftermath of Hurricane Georges, Congress allocated additional monies for long-term disaster recovery projects in the State of Florida to assist counties whose needs were yet unmet through allocation of primary disaster relief funds. This Unmet Needs money was earmarked for the counties most impacted by Hurricane Georges, including Monroe County. Monroe County, Florida requested that wastewater management improvement projects be considered for disaster funding since many existing wastewater facilities in Monroe County do not provide adequate collection, treatment, or disposal, and thus contribute greatly to degraded water quality in the Florida Keys. Since then, FEMA has received grant applications from several Monroe County communities to upgrade their current wastewater treatment facilities.

URS Group, Inc.  
200 Orchard Ridge Drive, Suite 101  
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Fax: 301.869.8728



Georgia Cranmore  
NMFS, Southeast Region  
November 20, 2003  
Page 2

The National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR Parts 1500 through 1508), and FEMA regulations for NEPA compliance (44 CFR Part 10) direct FEMA and other federal agencies to fully understand and take into consideration during decision making, the environmental consequences of proposed federal actions (projects). Therefore, FEMA must comply with NEPA, and other applicable federal laws and regulations, before making federal funds available for disaster recovery and mitigation actions. FEMA prepared a Programmatic Environmental Assessment (PEA) and reached a Programmatic Finding of No Significant Impact (PFONSI) on December 23, 2002, which was previously submitted to your office for review. This SEA tiers from that document.

#### Submitting Comments

Please submit your comments on the Draft SEAs in writing to Ms. Science Kilner, Lead Environmental Specialist, FEMA Region IV within 30 days of the receipt of this letter. Ms. Kilner's contact information is:

FEMA Region IV – Federal Insurance and Mitigation Division  
3003 Chamblee-Tucker Road  
Atlanta, GA 30341  
Fax: (770) 220-5440

Your comments will be considered during the Final SEA preparation process. Thank you for your involvement in this documentation process.

Sincerely,

URS Group, Inc.

Stephen Carruth  
Project Environmental Scientist

Attachments



June 5, 2003

Cecilia Weaver, Acting Director  
South Florida Water Management District  
10 High Point RD #B  
Tavernier, FL 33070-2006

**Subject: Notice of Draft Supplemental Environmental Assessment (SEA) for  
the Key Largo Wastewater System, Monroe County, Florida.**

Dear Ms. Weaver:

This purpose of this letter is to provide your agency with notice that URS Group, Inc., on behalf of the Federal Emergency Management Agency (FEMA), is preparing a Draft Supplemental Environmental Assessment (SEA) for the Key Largo Wastewater System, Monroe County, Florida. The Draft SEA evaluates several wastewater management alternatives proposed for Key Largo, and the potential environmental consequences associated with those alternatives. At this time, FEMA requests your comments regarding the range of alternatives (attached). Please note that this attachment represents only a portion of the draft SEA. Additionally, a street map of the project vicinity has also been attached.

In 1998, during the aftermath of Hurricane Georges, Congress allocated additional monies for long-term disaster recovery projects in the State of Florida to assist counties whose needs were yet unmet through allocation of primary disaster relief funds. This Unmet Needs money was earmarked for the counties most impacted by Hurricane Georges, including Monroe County. Monroe County requested that wastewater management improvement projects be considered for disaster funding since many existing wastewater facilities do not provide adequate collection, treatment, or disposal, and thus contribute to degrading water quality in the Florida Keys. Since then, FEMA has received a grant application from the Florida Keys Aqueduct Authority requesting Federal assistance to upgrade the current wastewater treatment facilities on Key Largo.

The National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR Parts 1500 through 1508), and FEMA regulations for NEPA compliance (44 CFR Part 10) direct FEMA and other Federal agencies to fully understand and take into consideration during decision making, the environmental consequences of proposed Federal actions (projects). Therefore, FEMA must comply with NEPA, and other applicable Federal laws and regulations,

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Miami Springs, FL 33166  
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Cecilia Weaver, Acting Director  
South Florida Water Management District  
June 5, 2003  
Page 2 of 2

before making Federal funds available for any disaster recovery and mitigation actions. A Programmatic Environmental Assessment (PEA) for Wastewater Management Improvements in the Florida Keys was prepared in accordance with these regulations, and provides a framework to address impacts of a range of wastewater treatment projects in the Florida Keys. In accordance with 40 CFR Part 1508.28, the Draft SEA for Key Largo tiers from the PEA, and addresses issues specific to this project location.

FEMA respectfully seeks your written comments within 30 days to the letterhead address. If you have any questions or comments, please do not hesitate to contact me at (305) 884-8900, or Ms. Science Kilner, FEMA Lead Environmental Specialist, at (770) 220-5357. Thank you very much for your assistance. Your comments will be considered during the Draft SEA preparation process.

Sincerely,

URS Group, Inc.

A handwritten signature in black ink, appearing to read 'R. Mendieta'.

Ramon Mendieta  
Environmental Scientist

Attachments as noted

cc:

Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Stephen Carruth, URS Group, Inc., Environmental Planner



November 20, 2003

Mr. James Golden, AICP  
Senior Planner  
Environmental Resource Regulation  
South Florida Water Management District  
3301 Gun Club Road  
West Palm Beach, Florida 33406

**Subject: Notice of Availability of the Draft Supplemental Environmental Assessment (SEA) of Proposed Wastewater Treatment Improvements for Key Largo in the Florida Keys, Florida.**

Dear Mr. Golden

On behalf of the Federal Emergency Management Agency (FEMA), URS Group, Inc. is providing your agency with a compact disk copy of the Draft Supplemental Environmental Assessment (SEA) for Wastewater Treatment Improvements in Key Largo, Monroe County, Florida. The Draft SEA evaluates the impacts of constructing wastewater treatment facilities in the communities of Key Largo Trailer Park and Key Largo Park. A separate, initial letter outlining FEMA's intent to prepare the Draft SEA for this project was transmitted to your agency on June 5, 2003. On July 2, 2003, your office replied with two general comments, one comment on Alternative 1, 12 comments on Alternative 2, and four comments on Alternative 3 for this project. Broader issues such as wastewater treatment technology alternatives, general environmental (including water quality) and economic effects (including cost reasonableness) were considered in the Programmatic Environmental Assessment. A draft of this document was provided to Ms. Rhonda Haag for SFWMD comment in a letter dated September 17, 2002. Many of the SFWMD's project and site-specific comments are addressed in the Draft SEA, including the existing environment and consequences to various resources. FEMA has also worked with its applicant, the Key Largo Wastewater Treatment District, to consider pertinent SFWMD design/engineering comments in the Draft SEA. At this time, FEMA welcomes additional comment your agency may have to the entire document, which is provided on the enclosed CD.

A public meeting on the Draft SEAs will be held for the Key Largo Project on December 3, 2003. The public review period for the Key Largo Draft SEA is from November 21 to December 19, 2003.

### **Background**

In 1998, during the aftermath of Hurricane Georges, Congress allocated additional monies for long-term disaster recovery projects in the State of Florida to assist counties whose needs were yet unmet through allocation of primary disaster relief funds. This Unmet Needs money was earmarked for the counties most impacted by Hurricane Georges, including Monroe County.

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Mr. James Golden, AICP  
South Florida Water Management District  
November, 20 2003  
Page 2

Monroe County, Florida requested that wastewater management improvement projects be considered for disaster funding since many existing wastewater facilities in Monroe County do not provide adequate collection, treatment, or disposal, and thus contribute greatly to degraded water quality in the Florida Keys. Since then, FEMA has received grant applications from several Monroe County communities to upgrade their current wastewater treatment facilities.

The National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR Parts 1500 through 1508), and FEMA regulations for NEPA compliance (44 CFR Part 10) direct FEMA and other federal agencies to fully understand and take into consideration during decision making, the environmental consequences of proposed federal actions (projects). Therefore, FEMA must comply with NEPA, and other applicable federal laws and regulations, before making federal funds available for disaster recovery and mitigation actions. FEMA prepared a Programmatic Environmental Assessment (PEA) and reached a Programmatic Finding of No Significant Impact (PFONSI) on December 23, 2002, which was previously submitted to your office for review. This SEA tiers from that document.

### Submitting Comments

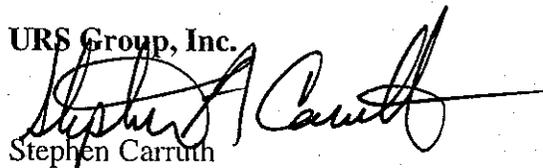
Please submit your comments on the Draft SEA in writing to Ms. Science Kilner, Lead Environmental Specialist, FEMA Region IV within 30 days of the receipt of this letter. Ms. Kilner's contact information is:

FEMA Region IV – Federal Insurance and Mitigation Division  
3003 Chamblee-Tucker Road  
Atlanta, GA 30341  
Fax: (770) 220-5440

Your comments will be considered during the Final SEA preparation process. Thank you for your involvement in this documentation process.

Sincerely,

URS Group, Inc.



Stephen Carruth  
Project Environmental Scientist

Attachments



June 5, 2003

John Studt, South Permits Branch Chief  
U.S. Army Corps of Engineers  
Regulatory Permits Division  
4400 PGA Blvd., Suite 500  
Palm Beach Gardens, FL 33410

**Subject: Notice of Draft Supplemental Environmental Assessment (SEA) for  
the Key Largo Wastewater System, Monroe County, Florida.**

Dear Mr. Studt:

This purpose of this letter is to provide your agency with notice that URS Group, Inc., on behalf of the Federal Emergency Management Agency (FEMA), is preparing a Draft Supplemental Environmental Assessment (SEA) for the Key Largo Wastewater System, Monroe County, Florida. The Draft SEA evaluates several wastewater management alternatives proposed for Key Largo, and the potential environmental consequences associated with those alternatives. At this time, FEMA requests your comments regarding the range of alternatives (attached). Please note that this attachment represents only a portion of the draft SEA. Additionally, a street map of the project vicinity has also been attached.

In 1998, during the aftermath of Hurricane Georges, Congress allocated additional monies for long-term disaster recovery projects in the State of Florida to assist counties whose needs were yet unmet through allocation of primary disaster relief funds. This Unmet Needs money was earmarked for the counties most impacted by Hurricane Georges, including Monroe County. Monroe County requested that wastewater management improvement projects be considered for disaster funding since many existing wastewater facilities do not provide adequate collection, treatment, or disposal, and thus contribute to degrading water quality in the Florida Keys. Since then, FEMA has received a grant application from the Florida Keys Aqueduct Authority requesting Federal assistance to upgrade the current wastewater treatment facilities on Key Largo.

The National Environmental Policy Act of 1969 (NEPA), the Council on Environmental Quality (CEQ) regulations implementing NEPA (40 CFR Parts 1500 through 1508), and FEMA regulations for NEPA compliance (44 CFR Part 10) direct FEMA and other Federal agencies to fully understand and take into consideration during decision making, the environmental consequences of proposed Federal actions (projects). Therefore, FEMA must comply with NEPA, and other applicable Federal laws and regulations,

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John Studdt, South Permits Branch Chief  
U.S. Army Corps of Engineers  
June 5, 2003  
Page 2 of 2

before making Federal funds available for any disaster recovery and mitigation actions. A Programmatic Environmental Assessment (PEA) for Wastewater Management Improvements in the Florida Keys was prepared in accordance with these regulations, and provides a framework to address impacts of a range of wastewater treatment projects in the Florida Keys. In accordance with 40 CFR Part 1508.28, the Draft SEA for Key Largo tiers from the PEA, and addresses issues specific to this project location.

FEMA respectfully seeks your written comments within 30 days to the letterhead address. If you have any questions or comments, please do not hesitate to contact me at (305) 884-8900, or Ms. Science Kilner, FEMA Lead Environmental Specialist, at (770) 220-5357. Thank you very much for your assistance. Your comments will be considered during the Draft SEA preparation process.

Sincerely,

URS Group, Inc.

A handwritten signature in black ink, appearing to read "Ramon Mendieta".

Ramon Mendieta  
Environmental Scientist

Attachments as noted

cc:

Vic Anderson, U.S. Army Corps of Engineers, Marathon Regulatory Office  
Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Stephen Carruth, URS Group, Inc., Environmental Planner



June 5, 2003

Heinz J. Mueller, Chief  
US Environmental Protection Agency, Region 4  
Office of Environmental Assessment  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303

**Subject: Notice of Draft Supplemental Environmental Assessment (SEA) for  
the Key Largo Wastewater System, Monroe County, Florida.**

Dear Mr. Mueller:

This purpose of this letter is to provide your agency with notice that URS Group, Inc., on behalf of the Federal Emergency Management Agency (FEMA), is preparing a Draft Supplemental Environmental Assessment (SEA) for the Key Largo Wastewater System, Monroe County, Florida. The Draft SEA evaluates several wastewater management alternatives proposed for Key Largo, and the potential environmental consequences associated with those alternatives. At this time, FEMA requests your comments regarding the range of alternatives (attached). Please note that this attachment represents only a portion of the draft SEA. Additionally, a street map of the project vicinity has also been attached.

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Heinz J. Mueller, Chief  
US Environmental Protection Agency, Region 4  
June 5, 2003  
Page 2 of 2

FEMA must comply with NEPA, and other applicable Federal laws and regulations, before making Federal funds available for any disaster recovery and mitigation actions. A Programmatic Environmental Assessment (PEA) for Wastewater Management Improvements in the Florida Keys was prepared in accordance with these regulations, and provides a framework to address impacts of a range of wastewater treatment projects in the Florida Keys. In accordance with 40 CFR Part 1508.28, the Draft SEA for Key Largo tiers from the PEA, and addresses issues specific to this project location.

FEMA respectfully seeks your written comments within 30 days to the letterhead address. If you have any questions or comments, please do not hesitate to contact me at (305) 884-8900, or Ms. Science Kilner, FEMA Lead Environmental Specialist, at (770) 220-5357. Thank you very much for your assistance. Your comments will be considered during the Draft SEA preparation process.

Sincerely,

URS Group, Inc.

A handwritten signature in black ink, appearing to read 'R. Mendieta'.

Ramon Mendieta  
Environmental Scientist

Attachments as noted

cc:

Science Kilner, FEMA Region IV, Lead Environmental Specialist  
Stephen Carruth, URS Group, Inc., Environmental Planner