



**Federal Emergency Management Agency**  
Region IV – Federal Insurance and Mitigation Division  
3003 Chamblee Tucker Road  
Atlanta, GA 30341  
Phone: (770) 220 5406  
Fax: (770) 220 5440

July 21, 2003

Mr. Allen Webb  
U.S. Fish and Wildlife Service  
South Florida Ecological Services Office  
1339 20<sup>th</sup> Street  
Vero Beach, Florida 32960-3559

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

Dear Mr. Webb

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 Bay Point Key/ Saddlebunch Key Wastewater System, Monroe County, Florida. A Programmatic Environmental Assessment (PEA) (referenced in the attachments) evaluating the environmental effects of wastewater management alternatives in the attachments) evaluating the environmental effects of wastewater management alternatives on a broad scale was completed in December 2002. The Draft SEA tiers from the PEA and evaluates three wastewater management alternatives proposed for Bay Point Key/Saddlebunch Key: No Action (Alternative 1); Centralized Wastewater Treatment Plant located on Bay Point Key (Alternative 2); and New Wastewater Transmission System Construction (Alternative 3). At this time, FEMA requests your concurrence with their findings of not likely to adversely effect in compliance with Section 7 of the Endangered Species Act and the Migratory Bird Treaty Act (MBTA) 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 Bay Point and Saddlebunch Keys 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 Bay Point and Saddlebunch Keys as the 3<sup>rd</sup> most critical "hot spot" in the Florida Keys. The "hot spot" ranking is linked to the use of cesspools and septic systems as Bay Point Key and Saddlebunch Key's main wastewater treatment systems. FEMA would provide funding assistance to the FKAA as part of their effort to assist residents on Bay Point and Saddlebunch Keys in meeting the Florida Statutory

Indian hemp (*Sida rhombifolia*), common wireweed (*Sida acuta*), wedelia (*Sphagneticola trilobata*), capeweed (*Phyla nodiflora*), West Indian dropseed (*Sporobolus indicus* var. *pyramidalis*), bluestem grasses (*Andropogon* spp.), and crowfootgrass (*Dactyloctenium aegyptium*).

No federal- or State-listed wildlife species were observed on the preferred site. No jurisdictional wetlands or surface waters or other critical habitat were identified at this site.

#### Description of Alternate Sites

Under Alternative 3, a transmission system would be constructed from Bay Point Key to an existing treatment plant on Stock Island. Under this alternative, a site located Bay Point Key located at approximately MM 14.8, south of US-1 and east of West Circle Drive (previously described under Alternative 2) would be used for the placement of a vacuum pump station. In addition, an approximately 11-mile transmission system corridor to an existing treatment plant on south Stock Island would be required. Portions of the transmission force main would be slip-lined in an abandoned 18-inch FKA water main that runs parallel to US-1. Areas not available for slip-lining would be trenched to accommodate the force main. The entire transmission system would be contained in the southern right-of-way (ROW) of US-1.

Much of the vegetation adjacent to the paved US-1 roadway, along the proposed transmission system route consists primarily of grasses and weeds typical of maintained ROW, grading south to a forested fringe of coastal wetland vegetation with an open connection to the Atlantic Ocean. Vegetation within the maintained ROW consists of Bermuda grass (*Cynodon dactylon*), St. Augustine grass (*Stenotaphrum secundatum*), and crowfootgrass. A few planted ornamentals consisting mainly of coconut palms (*Cocos nucifera*) are also present along portions of the 11-mile corridor. An 8-foot wide bicycle/pedestrian trail, extending from the Bay Point vacuum pump station site to Shark Channel, is located along the proposed transmission corridor.

Adjacent to the south of the maintained ROW, fringing coastal mangrove wetlands with open connections to the Atlantic Ocean form an almost continuous system from Bay Point Key to Shark Channel, broken only by a paved access road (Blue Water Drive) on Saddlebunch Key. The widths of the fringing coastal wetlands vary from approximately 10 feet to 40 feet. The tidal wetlands from Bay Point Key to Big Coppitt Key include the surface waters and mangrove islands of Saddlebunch 2, 3, 4, and 5 Bridge crossings. Dominant species within these coastal wetlands include red mangrove (*Rhizophora mangle*), black mangrove (*Avicennia germinans*), white mangrove (*Laguncularia racemosa*), buttonwood (*Conocarpus erectus*), and sea oxeye (*Borrchia frutescens*). Brazilian pepper and seagrape (*Coccoloba uvifera*) were also present along the outermost landward edge.

and rice rat have specific requirements for undisturbed nesting and foraging habitat, and any occurrences at these sites by these species would be transitory in nature.

The federally-threatened Stock Island tree snail (*Orthalicus reses reses*) may potentially occur in the area of the KWRU WWTP (Hipes et al, 2001), but due to the highly developed and urbanized environment it is unlikely that the site provides suitable habitat for this species.

The osprey (*Pandion haliaetus*) is listed by the State as a Species of Special Concern in Monroe County. One osprey nest was observed along the transmission system corridor on Boca Chica. Potential impacts to the osprey would be limited to temporary disruption of foraging along the fringe of mangrove trees directly adjacent to the construction area. No permanent impacts to the existing osprey nest are anticipated as a result of this project.

Additionally, due to its small size, proximity to US-1 and other developed areas and degraded habitat value due to exotic species invasion, the Preferred Site is not likely to provide significant nesting, roosting or foraging habitat for migratory birds or other transient species. The Alternate Site may provide some foraging habitat for migratory birds and other transient species, but no permanent impacts to foraging habitat are anticipated.

Under the No Action Alternative (Alternative 1), no changes would be made to the existing wastewater systems. It is likely that the benefits associated with improved water quality would be delayed and continued degradation in water quality would continue in the short-term.

Based on the results of the biological field visit, consultation with experts, and a review of special status species lists, FEMMA finds that the proposed alternatives would not result in the take of federally listed 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, FEMMA respectfully seeks written concurrence on this determination of no effect within 30 days to the letterhead address.

June 5, 2003

Georgia Crannmore, 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. Crannmore:

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

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.satfmc.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

Georgia Cranmore  
NMFS, Southeast Region  
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, 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.

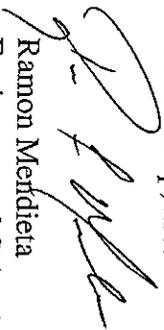
All equipment operating in the project area would be regularly cleaned, checked for leaks, and otherwise maintained. Equipment refueling would be done away from marine waters, and, in the unlikely event that a fuel leak or spill were to occur, adequate containment equipment and cleanup (absorbent material) 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 Kiher, FEMA Lead Environmental Specialist, at (770) 220-5357. Thank you very much for your assistance.

Sincerely,

URS Group, Inc.



Rannon Merdieta  
Environmental Scientist



Georgia Crammore  
NMFS, Southeast Region

June 5, 2003

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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.serco.nmfs.gov>

NOV 19 2003

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 V/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



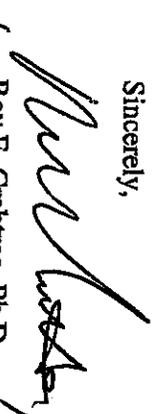
disposal wells. This project, when complete, will serve to improve water quality in an area that currently treats its sewage through the use of septic tanks and cesspools, and will, therefore, have a net benefit to marine ecosystems in the area. NOAA Fisheries, therefore, believes that the proposed action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

This letter concludes FEMMA'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

June 5, 2003

Ms. Jocelyn Karaszia  
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. Karaszia:

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.

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Ms. Jocelyn Karaszia  
National Marine Fisheries Service

June 5, 2003

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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 Karaszia  
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, 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.

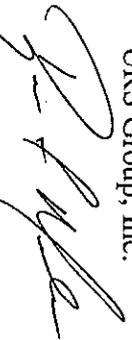
All equipment operating in the project area would be regularly cleaned, checked for leaks, and otherwise maintained. Equipment refueling would be done away from marine waters, and, in the unlikely event that a fuel leak or spill were to occur, adequate containment equipment and cleanup (absorbent material) 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 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 33156

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.

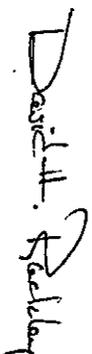
According to the information provided, no marine resources, tidal wetlands or other potential Essential Fish Habitat (EFH) exist within 150 feet of the proposed site of Alternative 2. Under Alternative 3, the proposed WWTP is located adjacent to the Straights of Florida. The site is completely developed 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

# FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION



JAMES L. "JAMIE" ADAMS, JR. Bushnell	BARBARA C. BARSH Jacksonville	QUINTON L. HEDGEPEITH, DDS Miami	H.A. "HERKY" HUFFMAN Deltona
DAVID K. MEEHAN St. Petersburg	JULIE K. MORRIS Sarasota	TONY MOSS Miami	EDWIN P. ROBERTS, DC Pensacola
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LAN I. EGBERT, Ph.D., Executive Director  
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OFFICE OF ENVIRONMENTAL SERVICES  
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July 14, 2000

Mr. John B. Copenhagen, Regional Director  
Federal Emergency Management Agency  
3003 Chamblee Tucker Road  
Atlanta, GA 30341-4130

Re: Preliminary Environmental Assessment  
Proposed Wastewater Treatment Plant Site  
Key Largo, Florida

Dear Mr. Copenhagen:

The Office of Environmental Services of the Florida Fish and Wildlife Conservation Commission would like to submit to you our comments concerning the referenced document. Our office has participated in several previous meetings pertaining to the siting of a sewage treatment plant, to be partially funded by FEMA, on Key Largo. Our staff was present at a recent interagency conference call hosted by the Florida Governor's office, and we participated in the interagency field inspection of the proposed site on July 10, 2000. We have also been following correspondence between your agency and the U. S. Fish and Wildlife Service (USFWS) pertaining to the potential need to prepare an Environmental Assessment for this project pursuant to the National Environmental Policy Act (NEPA) and to consult with USFWS under Section 7 of the U. S. Endangered Species Act. It appears that the referenced document may factor into FEMA's efforts to prepare an Environmental Assessment of the proposed site, and it also appears that present circumstances are compelling FEMA to expedite the process. Given these circumstances, we are providing you the following comments concerning the Preliminary Environmental Assessment prepared by Monroe County staff.

## Listed Species

The Preliminary Environmental Assessment identifies a set of species listed by either State or federal agencies as endangered, threatened, or species of special concern as occurring, or potentially occurring, on the site. The list is not complete. First, the site contains potential habitat for the rim rock crowned snake (*Tamilla oolitic*), a species listed as threatened by the State of Florida due to the rapid rate of loss of its habitat. The rim rock crowned snake is endemic to a small area of southeast Florida, including the upper Keys. It is a secretive burrower

that occupies a variety of habitats including tropical hardwood hammocks. Second, the environmental assessment did not include a number of State-listed plants likely to occur on site. The proposed site for the Key Largo sewage treatment plant is a 22-acre parcel of land that has been targeted for acquisition by the State of Florida under the Conservation and Recreation Lands (CARL) program. The parcel is included within the larger 191-acre Newport Hammocks tract, a part of the Florida Keys Ecosystem CARL project. The Florida Keys Ecosystem CARL project ranks number two out of 32 priority projects identified for acquisition under the CARL program. The Newport Hammocks tract has been surveyed for the presence or rare and imperiled species by various biologists. The Florida Natural Areas Inventory element occurrence database indicates that the following listed plants occur on the Newport Hammocks tract: wild cinnamon (*Canella winteriana*, endangered), yellowwood (*Schaefferia frutescens*, endangered), Simpson's prickly apple (*Harrisia simpsonii*, endangered), whitish passionflower (*Passiflora multiflora*, endangered), milkbark (*Drypetes diversifolia*, endangered), banded wild-pine (*Tillandsia flexuosa*, endangered), wild cotton (*Gossypium hirsutum*, endangered), Florida thatch palm (*Thrinax radiata*, endangered), joewood (*Jacquinia keyensis*, threatened), wild dilly (*Manilkara bahamensis*, threatened), and golden leather fern (*Acrostichum aureum*, threatened). While these plants are known from the Newport Hammocks CARL site, they are not necessarily present on the proposed wastewater treatment plant site. Nevertheless, their potential presence should be discussed in the environmental assessment, and any surveys planned for the site should include these species as potential candidates.

The Preliminary Environmental Assessment provides a brief discussion of the potential presence of Schaus' swallowtail butterfly (*Heracles aristodermus ponceanus*) on the site. This butterfly is listed by State and federal agencies as an endangered species. This endangered species has been reintroduced to John Pennecamp Coral Reef State Park within two miles of the proposed site. This reintroduction effort has been successful thus far. While Schaus' swallowtail butterfly may or may not be present on the site at the present time, the potential exists for it to colonize this part of its historic range some time in the relatively near future. Similarly, the assessment contains a brief discussion of the potential presence of Stock Island tree snail (*Orthalicus reses reses*), a species listed as endangered by both State and federal agencies. While not known with certainty to be present at this site, the Stock Island tree snail is known to be present within one mile of the proposed sewage treatment site. If not present, the potential also exists for this species to colonize this site at some future date.

The Preliminary Environmental Assessment included a number of species of animals as potentially occurring on site that are very unlikely to be present. The following species probably do not occur on the site and should be withdrawn from further consideration: American alligator (*Alligator mississippiensis*), American crocodile (*Crocodylus acutus*), Florida brown snake (*Storeria dekayi victa*), southeastern kestrel (*Falco sparverius paulus*), Arctic peregrine falcon (*Falco peregrinus tundrius*), southern bald eagle (*Haliaeetus leucocephalus*), least tern (*Sterna antillarum*), and roseate tern (*Sterna dougalli*). The Key Largo woodrat (*Neotoma floridana smalli*) and Key Largo cotton mouse (*Peromyscus gossypinus allapaticola*) are both listed as endangered by State and federal agencies, and the project site is within the historic range of these small mammals. However, at this point in time, these species are known to occur only in North

Key Largo. While this site probably should be surveyed for these endangered mammals, it is unlikely that they will be found.

#### Strategic Habitat Conservation Area

The Preliminary Environmental Assessment did not include a discussion of the ecological importance of this site as identified in our 1994 report entitled, "Closing the Gaps in Florida's Wildlife Habitat Conservation System." The purpose of this report was to assess the habitat conservation needs of rare and imperiled animals, plants, and natural communities in Florida. The report used a set of indicator species and communities to assess current levels of biodiversity protection and to identify lands in need of protection. Lands identified for protection were referred to as strategic habitat conservation areas, which were defined as privately owned lands that, taken in conjunction with existing publicly owned lands, have the best chances of meeting the long-term habitat needs of most components of Florida's biological diversity. The intent was that, if strategic habitats could be protected, future extinctions of plant and animal species in Florida could be averted.

The Closing the Gaps report identified the proposed sewage treatment plant site as a strategic habitat conservation area for white-crowned pigeon (*Columba leucocephala*, threatened), black-whiskered vireo (*Vireo altiloquus*, unlisted), and tropical hardwood hammock natural community. In our opinion, the importance of this site to the long-term conservation needs of biodiversity in Florida is clearly indicated by the presence of three of our indicator species and communities.

#### Current Status of the Tropical Hardwood Hammock Community

In our opinion, the Preliminary Environmental Assessment overlooks the significance of the proposed site within the context of the bigger picture of conservation of tropical hardwood hammocks as a rare natural community type. Tropical hardwood hammocks are the successional climax community of the rockland habitats of extreme south Florida. This community type supports a high diversity of plants and animals found nowhere else in the United States. A minimum of 30-40 years are needed for a hammock community to begin to mature following disturbance. Thus, the presence of a high quality tropical hardwood hammock on the proposed site attests to the time since last disturbance as well as the time frame over which the ecological conditions necessary to support associated rare and imperiled plants and animals have been developing.

The best remaining examples of tropical hardwood hammocks in the United States are found in the Florida Keys, and most of these are on Key Largo. While we have never seen an estimate of the original area of Florida covered by tropical hardwood hammocks, our inventories of vegetation types statewide indicated that there were no more than 15,345 acres remaining in Florida in the late 1980s, and almost all of it was found in the Keys. As of December 1999, only 8,137 acres of tropical hardwood hammock were protected by public ownership despite much of the remainder having been targeted for public acquisition for over 10 years. When compared with the status of other natural communities in Florida, these are alarmingly small numbers. The

only secure future for the rare tropical hammock community type hinges on land management practices on existing public lands and on land use decisions made for the development of private lands. The variety of rare and imperiled plants and animals found in tropical hardwood hammocks and the very limited amount of land available to support these species dramatically increases the ecological significance of remaining tracts such as the one on the proposed site.

Over years of human development, the tropical hardwood hammock community has become highly fragmented. That is, due to habitat loss, remaining patches have become smaller in size and isolated from one another. A consequence of converting large contiguous patches of habitat into small isolated fragments is that wide-ranging species with large area requirements (e.g., eastern indigo snake) are eliminated from smaller patches. As an example, the white-crowned pigeon typically does not forage in forest patches smaller than 12 acres. Past developments that have resulted in fragmentation effects at the project site include US 1 along the west boundary, the Florida Keys Aqueduct Authority facility to the southwest of the site, the road along the east boundary, and a small private development to the southeast of the site. Nevertheless, the tropical hardwood hammock on site is contiguous with a much larger patch of tropical hardwood hammock that extends to the northeast. A portion of the adjacent hammock is already in State ownership and is managed as part of John Pennekamp Coral Reef State Park. Thus, despite past disturbances surrounding the site, the proposed site is part of a much larger patch of tropical hardwood hammock, portions of which are in public ownership. This contiguity increases the likelihood that this site is used by species such as the indigo snake, and it enhances the overall ecological importance of the site for a variety of rare and imperiled species.

#### Potential for Residential Development

The Preliminary Environmental Assessment asserts that a minimum of eleven single-family homes could be permitted on the proposed site, and that the number could increase to as many as 22 single-family homes through the use of Transferable Development Rights (TDR). The assessment further states that, despite habitat constraints contained within the Monroe County Land Development Regulations (LDR), it is not practical to assume that the County could constrain the ultimate configuration of residential lots. The purpose for this statement is to suggest that the impacts to ecological resources associated with clearing 3.6 acres of tropical hardwood hammock in a rectangular patch would be less than those associated with conversion of the site to evenly distributed residential use. While these points are technically accurate, such a development scenario is highly unlikely to occur under the current regulatory environment existing in Monroe County.

Until such time as concerns over hurricane evacuation times are resolved, the Monroe County Rate of Growth Ordinance (ROGO) limits the number of building permits than can be issued throughout the Keys to 225 per year. The number that can be issued in the Upper Keys (excluding Islamorada) is 52 per year, and these are further limited to no more than 13 per quarter. Because the demand for building permits is greater than the supply, the ROGO provides for a point system to score individual permit applications based on site-specific conditions. Proposed developments having higher scores are more likely to receive one of the 13 building permits available quarterly. In general, positive points are assigned to projects that are in a

plated subdivision, have infrastructure available, that aggregate vacant lots, that employ TDRs, that incorporate water and energy conservation features, and have high integrity of construction. On the other hand, negative points are assigned to sites with high quality habitats (high quality hammock such as that on the proposed site has the highest rank), with threatened or endangered species or their habitats, that are on the State's CARL list, and that are in coastal high hazard areas.

A recent phone call to Monroe County staff verified that, during the last quarter, applicants allocated building permits in the Upper Keys had projects scoring a minimum of 18 ROGO points. Our staff applied the ROGO scoring system to a hypothetical building permit application for a single-family dwelling on the proposed site, and concluded that such an application would probably have a score of around -14 ROGO points. A few points could be added through density reduction, land dedication, TDRs, and perseverance, but these additional points probably would not even get the project into the plus column for ROGO points. In other words, the most well-designed single-family residence proposed for this site would likely fall far short of the number of ROGO points needed to obtain a building permit in today's competitive market. In fact, for the amount of money one would have to spend to obtain the maximum number of ROGO points at this site, a person could more than likely purchase an existing developable canal-front lot, and maybe even an ocean-front lot. Moreover, upon designing a project with the maximum possible ROGO points, the project would still likely fall short of the 18 points needed to obtain a building permit allocation for the last quarter.

For these reasons, we conclude that it is highly unlikely that the site proposed for the sewage treatment plant could actually accommodate the suggested 22 single-family dwelling units in today's regulatory environment. In fact, it is more likely that no one would even seek a building permit at this location because of the disincentives built into the system. However, even if we assume building permits could be obtained for at least a few single-family dwelling units, the amount of clearing on the site would still be limited to 4.4 acres by the 80% open space requirement in the Monroe County LDR. Section 9.5-345(a)(3) of the Monroe County LDR requires that developments on a site containing one ecologically sensitive habitat type shall be clustered in the least ecologically valuable area of habitat on the site. This means that single-family residences probably would have to be clustered in the southwest corner of the site near the Florida Keys Aqueduct Authority facilities, the portion of the site adjacent to the greatest amount of disturbance. We conclude from this language that, in the highly unlikely event that building permits could be obtained, the County has the regulatory authority to limit the footprint of the development to one similar to that of the proposed sewage treatment plant. Therefore, impacts from residential versus sewage treatment plant development may not be dissimilar.

### Conclusion

The Preliminary Environmental Assessment prepared by Monroe County staff underrates the ecological importance of the 22-acre site proposed for a sewage treatment plant. The site is completely covered by mature tropical hardwood hammock, a very rare natural community type found almost exclusively in the Florida Keys. Fewer than 15,000 acres of tropical hardwood hammocks remain in the United States, and only 8,000 acres are currently in public ownership.

Mr. John B. Copenhagen

July 14, 2000

Page 6

This site is included within parcels targeted for acquisition as part of the CARL program's Florida Keys Ecosystem project, the number two ranked priority project for public land acquisition in Florida. The high ranking of this CARL project site is due largely to its recognized ecological values. The site is adjacent to and contiguous with lands owned by the State of Florida and managed by John Pennkamp Coral Reef State Park. The site is occupied by, or provides potential habitat for, numerous animals and plants listed by State or federal agencies as endangered, threatened, or species of special concern. Our own work has identified this site as a strategic habitat conservation area for three indicators of biodiversity, the white-crowned pigeon, black-whiskered vireo, and tropical hardwood hammock natural community. The suggestion that siting a sewage treatment plant on this site will save the ecological resources from the impacts of dispersed residential development appears to be unfounded.

We urge you to consider these factors as you prepare your Environmental Assessment for the NEPA process. Moreover, we recommend against FEMA funding for land acquisition and construction of a sewage treatment plant at this site because of its high ecological values. Monroe County staff recommended two other candidate sites for this use, neither of which has the significant ecological values found on the 22-acre site.

If you need additional information or would like to discuss our concerns further, you may contact me at 850-488-6661.

Sincerely,

  
Bradley J. Hartman, Director  
Office of Environmental Services

BJH/RK

cc: William Straw, FEMA  
Science Kilner, FEMA  
James Slack, FWS  
Tom Grahl, FWS  
Jeanette Gallhugh, FWS  
Tom Beck, DCA  
Eva Armstrong, DEP  
Fran Mainella, DEP  
Mimi Drew, DEP  
Teresa Tinker, Governor's Office  
Ralph Gouldy, Monroe County

**URS**

January 23, 2001

Mr. Randy Kautz  
Florida Fish and Wildlife Conservation Commission  
620 South Meridian Street  
Tallahassee, FL 32399-1600

Re: **Biological Assessment for Wastewater Treatment Plant Site – Mile Marker 100.5,  
Key Largo, Florida**

Dear Mr. Kautz:

Per request of Ms. Science Kilner with the Federal Emergency Management Agency, Region IV, I've enclosed a copy of the Biological Assessment (BA) that URS completed in conjunction with Monroe County Department of Marine Resources.

This BA addresses the potential effects of constructing a proposed regional wastewater treatment system in Key Largo, Florida, with an emphasis on the specific site for a regional wastewater treatment plant selected by the Board of County Commissioners on May 18, 2000. This BA is based on existing documents and information, as well as site-specific information, for the treatment plant site that was developed by staff of the Monroe County Department of Marine Resources.

This document constitutes a Biological Assessment in accordance with the rules requiring federal agency consultation under the Endangered Species Act.

We welcome your comments on this document, if you so choose. Please send your comments to the address below. If you have any questions, please feel free to call me at (678) 356-8223.

Sincerely,

URS



Kenneth W. Branton  
Senior Project Engineer

KWB/kwb  
Enclosure

URS Corporation  
5900 Windward Parkway, Suite 400  
Alpharetta, GA 30005  
Tel: 678.356.8300  
Fax: 678.356.0055

June 5, 2003

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

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

Dear Mr. Robson:

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,



Mark Robson, Regional Director  
Florida Fish and Wildlife Conservation Commission

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".

Rannon Mendieta  
Environmental Scientist

Attachments as noted

cc:

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

# FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION



EDWIN P. ROBERTS, DC  
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July 1, 2003

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

Re: Draft Supplemental Environmental  
Assessment for the Key Largo  
Wastewater System, Monroe County

Dear Mr. Mendieta:

The Office of Environmental Services of the Florida Fish and Wildlife Conservation Commission has reviewed the proposed alternatives for the referenced project. Alternative 2 would impact approximately 2.6 acres of a 22 acre high-quality hardwood hammock owned by Monroe County. The tropical hardwood hammocks with the Florida keys are a unique and rapidly disappearing habitat and we would not be in favor of utilizing this hammock for a wastewater system. Alternative 3 would locate the proposed plant on a previously cleared 3.8 acre site. Therefore, we strongly recommend that Alternative 3, the southern site be utilized for the proposed project.

Sincerely,

A handwritten signature in black ink, appearing to read "Stephen R. Lau".

Stephen R. Lau  
Biological Administrator

ENV 1-10-2  
SRL/js

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  
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', written over a horizontal line.

Rannon 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

SAL: 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 Mendietta  
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, FWCC  
Sandra Whitmore, DOT

Memorandum

Florida Department of  
**Environmental Protection**

**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

---

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 64F-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.
      - 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.
    - 2.



**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](http://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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Dean, Executive Director

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treatment facilities on the northern and southern sites, SFWMMD staff reviewing the DSEA is not familiar with the PEA nor the information contained therein. Consequently, the SFWMMD'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-Etinger 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

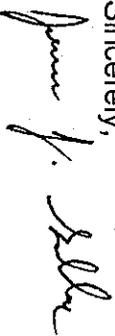
- (16) For Alternative 2 (northern site), the DSEA indicates that the finished floor elevations for the pump station and treatment plant will be built "above the base flood elevation of 8 feet National Geodetic Vertical Datum." However, for Alternative 3, which utilizes the same location for the pump 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,



James J. Golden, AICP  
Senior Planner  
Environmental Resource Regulation

/jig

c: Ramon Mendiatá, URS Corporation

# FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION



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(850)488-6661 TDD (850)488-9542  
FAX (850)922-5679

June 19, 2003

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

Re: SAI# FL200306112523C  
Draft Supplemental Environmental Assessment (SEA)  
Key Largo Wastewater System, Monroe County, Florida

Dear Ms. Milligan:

The Office of Environmental Services of the Florida Fish and Wildlife Conservation Commission has reviewed the referenced document, and submits the following comments.

As indicated in the cover letter to the Clearinghouse, URS Group, Inc., is preparing the Draft SEA on behalf of the Federal Emergency Management Agency (FEMA). URS indicates that the "Draft SEA evaluates several wastewater management alternatives proposed for Key Largo, and the potential environmental consequences associated with those alternatives." URS further states that the information that has been submitted for review represents "only a portion of the Draft SEA."

The information submitted to the Clearinghouse is not sufficient for State review of the potential impacts of the proposed alternatives on the ecological resources of the candidate sites. The information that was submitted is limited to a set of engineering specifications for the proposed wastewater treatment facility. The portion of the Draft SEA submitted to the Clearinghouse contains almost no information concerning the fish, wildlife, or other ecological resources on the alternative project sites.

Nevertheless, we have been involved with the planning for this project since early in 2000, and we are very familiar with the alternative sites. Members of our staff have participated

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in numerous meetings pertaining to this project, we were present at a conference call sponsored by the Governor's Office, and we have conducted several field inspections of the proposed sites. On July 14, 2000, we sent a letter (attached) to Mr. John Copenhagen, Regional Director of FEMMA, providing ecological resource information concerning the 22-acre site at Mile Marker (MM) 100.5 (Alternative 2 in the Draft SEA). We also registered our opposition to construction of the proposed wastewater treatment facility at this site.

A summary of our reasons for opposing construction of a sewage treatment facility at MM 100.5 is as follows. The 22-acre site is completely covered by mature tropical hardwood hammock, a very rare natural community type found almost exclusively in the Florida Keys. Fewer than 15,000 acres of tropical hardwood hammocks remain in the United States, and only 8,000 acres are currently in public ownership. This site is included within parcels targeted for acquisition by the State of Florida under the State's Florida Forever land acquisition program. This parcel is part of the Florida Keys Ecosystem project, which is on the A list, and its high ranking is due largely to its recognized ecological values. The site is adjacent to and contiguous with lands owned by the State of Florida and managed by John Pennekamp Coral Reef State Park. The site is occupied by, or provides potential habitat for, numerous animals and plants listed by State or federal agencies as endangered, threatened, or species of special concern. Our own work has identified this site as a strategic habitat conservation area for three indicators of biodiversity, the white-crowned pigeon, black-whiskered vireo, and the tropical hardwood hammock natural community. Earlier drafts of the environmental assessment for this project suggested that the best way to save the ecological resources of this site from the adverse impacts of potential residential development was to construct a sewage treatment plant on the site. However, we concluded that this assertion was unfounded. More detail concerning the ecological resource values of the MM 100.5 site are contained in the attached letter.

In contrast, the proposed site at MM 98 (Alternative 3 in the Draft SEA) includes 3.8 acres that have already been cleared, grubbed, and developed. The site is presently used for boat and vehicle storage and other uses. There would be virtually no impact to rare and imperiled species of fish and wildlife or natural plant communities associated with construction of a sewage treatment facility at the MM 98 site.

In summary, the submitted information contains no characterization of the ecological resources at the two sites proposed for construction of a sewage treatment facility on Key Largo. However, we are familiar with these sites and this project. We recommend that the proposed sewage treatment facility be constructed on the disturbed site at MM 98 (Alternative 3). We recommend against location of the facility in the 22-acre site at MM 100.5 (Alternative 2). The tropical hardwood hammock at MM 100.5 is a rare natural community type found only in extreme south Florida; it hosts several species of plants and animals listed as rare and endangered; it is contiguous with other hammock parcels that are contiguous with John Pennekamp Coral Reef State Park; and it is proposed for acquisition under the Florida Forever program.

Ms. Lauren Milligan  
June 19, 2003  
Page 3

Thank you for the opportunity to comment on this project. If you need additional information concerning this matter, please contact me or Mr. Randy Kautz at (850) 488-6661.

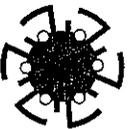
Sincerely,

A handwritten signature in cursive script that reads "Brian Barnett".

Brian S. Barnett, Interim Director  
Office of Environmental Services

ENV 8-4/10  
Attachment

South  
Florida  
Regional  
Planning  
Council



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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3440 Hollywood Boulevard, Suite 140, Hollywood, Florida 33021  
Broward (954) 985-4416, State (800) 985-4416  
SunCom 473-4416, FAX (954) 985-4417, Sun Com FAX 473-4417  
email: sfadmin@sfrpc.com, website: www.sfrpc.com

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/

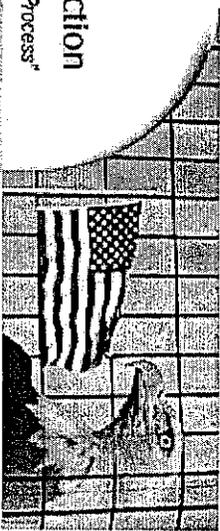
cc: Timothy McGarry, Monroe County Growth Management



# 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>	PEMA - HAZARD MITIGATION - KEY LARGO WASTEWATER SYSTEM - MONROE COUNTY
<b>CEDA #:</b>	83.519
<b>Agency Comments:</b>	
SOUTH FL RPC - SOUTH FLORIDA REGIONAL PLANNING COUNCIL	
No Final Comments Received	
MONROE -	
No Final Comments Received	
ENVIRONMENTAL POLICY UNIT - OFFICE OF POLICY AND BUDGET, ENVIRONMENTAL POLICY UNIT	
nc	
COMMUNITY AFFAIRS - FLORIDA DEPARTMENT OF COMMUNITY AFFAIRS	
Released Without Comment	
FISH and WILDLIFE COMMISSION - FLORIDA FISH AND WILDLIFE CONSERVATION COMMISSION	
3-PAGE LETTER BY BRIAN BARNETT DATED JUNE 19, 2003 (PLUS ENCLOSURE)	
HEALTH - FLORIDA DEPARTMENT OF HEALTH	
nc	
STATE - FLORIDA DEPARTMENT OF STATE	
nc	
TRANSPORTATION - FLORIDA DEPARTMENT OF TRANSPORTATION	
<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>	
ENVIRONMENTAL PROTECTION - FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION	
Memo attached outlining DEP concerns and requirements.	
SOUTH FLORIDA WMD - SOUTH FLORIDA WATER MANAGEMENT DISTRICT	

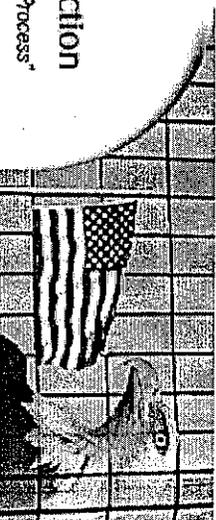
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# Florida

Department of Environmental Protection

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<b>Project Comment Confirmation</b>	
<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  
SPE-FEMA

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

MESSAGE:

STATE AGENCIES	WATER MNGMNT. DISTRICTS	OPB POLICY UNIT	RPCS & LOC GOVS
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 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
- Comment Attached
- Not Applicable
- No Comment/Consistent
- Consistent/Comments Attached
- Inconsistent/Comments Attached
- Not Applicable

From: Division of Historical Resources  
Bureau of Historic Preservation

Reviewer: SARAH JAYVINS SAC 7/5/03

Date: 7/11/03

02/39/S  
ROHA: 48MM  
NIPPA

*Sarah Jayvins*

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JUL 22 2003

23:3 HD 31 NIPPA

NOTIFIED BY JUDITH  
BUREAU OF  
DEALING

COUNTY: MONROE

DATE: 6/9/2003

COMMENTS DUE DATE: 7/9/2003

CLEARANCE DUE DATE: 8/8/2003

SA#: FL200306112523C

BH

MESSAGE:

STATE AGENCIES	WATER MNGMNT. DISTRICTS	OPB POLICY UNIT	RPCS & LOC GOVS
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:

- 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 G). 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

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

- |  |   |
|--|---|
| <input checked="" type="checkbox"/> No Comment | <input type="checkbox"/> No Comment/Consistent          |
| <input type="checkbox"/> Comment Attached      | <input type="checkbox"/> Consistent/Comments Attached   |
| <input type="checkbox"/> Not Applicable        | <input type="checkbox"/> Inconsistent/Comments Attached |
|  | <input type="checkbox"/> Not Applicable                 |

From:

Division/Bureau:

Reviewer:

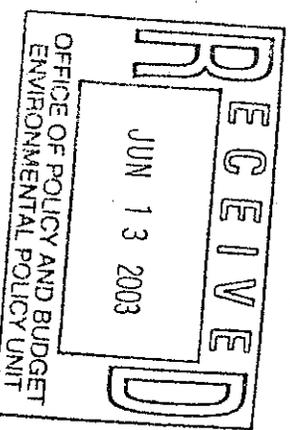
Date:

*OPB. Srv. P. Cannon*  
 7/8/03

RECEIVED

JUL 14 2003

OIP/OLGA



COUNTY: MONROE

DATE: 6/9/2003

COMMENTS DUE DATE: 7/9/2003

CLEARANCE DUE DATE: 8/8/2003

SA#: FL200306112523C

*BR*

MESSAGE:

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

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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.

*WWTP 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  
 Comment Attached  
 Not Applicable  
 No Comment/Consistent  
 Consistent/Comments Attached  
 Inconsistent/Comments Attached  
 Not Applicable

HSES Onsite Sewage Programs

From:

Dale Holcomb

Division/Bureau: 6-23-2003

Reviewer:



Date:

RECEIVED

JUN 3 0 2003

OIP/OLGA



**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](http://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 [SAL#: 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

*GOVERNING BOARD*

Nicolás J. Gutiérrez, Jr., Esq., *Chair*  
Pamela Brooks-Thomson, *Vice-Chair*  
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Hugh M. English  
Lennart E. Lindahl, P.E.

Kevin McCarty  
Harkley R. Thornton  
Trudi K. Williams, P.E.

*EXECUTIVE OFFICE*

Henry Dean, *Executive Director*

Ms. Lauren Milligan  
July 2, 2003  
Page 2

treatment facilities on the northern and southern sites, SFWMMD staff reviewing the DSEA is not familiar with the PEA nor the information contained therein. Consequently, the SFWMMD'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,



James J. Golden, AICP  
Senior Planner  
Environmental Resource Regulation

/jig

c: Ramon Mendata, URS Corporation



June 5, 2003

Laura Kammerer, Section Administrator  
Compliance and Review Section  
Division of Historical Resources  
R.A. Gray Building, Room 305  
500 South Bronough Street  
Tallahassee, FL 32399-0250

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

Dear Ms. Kammerer:

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,

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



Laura Kammerer, Section Administrator  
Compliance and Review Section  
Division of Historical Resources

June 5, 2003

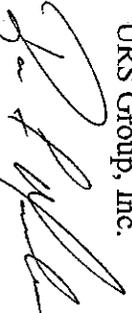
Page 2 of 2

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.



Rannon Merdieta  
Environmental Scientist

Attachments as noted

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

June 5, 2003

Miles Anderson  
Division of Emergency Management  
Florida Department of Community Affairs  
2555 Shumard 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.

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,



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

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FEMMA 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, FEMMA 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 Mendifera  
Environmental Scientist

Attachments as noted

cc: Science Kilner, FEMMA 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,

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

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:

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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Gerald Briggs, Chief  
Florida Department of Health  
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 "Ramon Mendietta".

Ramon Mendietta  
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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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.

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



Bill Causey, Superintendent  
Florida Keys National Marine Sanctuary  
June 5, 2003  
Page 2 of 2

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

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  
Page 2 of 2

FEMMA 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.

FEMMA 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, FEMMA 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, FEMMA Region IV, Lead Environmental Specialist  
Stephen Carruth, URS Group, Inc., Environmental Planner

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,



Cecilia Weaver, Acting Director  
South Florida Water Management District  
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

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.

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Tim McGarry  
Monroe County Growth Management Director  
June 5, 2003  
Page 2 of 2

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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

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.

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Teresa Tinker, Policy Coordinator  
Growth Management and Strategic Planning

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

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.



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

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.

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John Shudt, South Permits Branch Chief  
U.S. Army Corps of Engineers

June 5, 2003

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URS Group, Inc.

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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  
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Rannon Mendieta  
Environmental Scientist

Attachments as noted

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