February 11, 2020

FWC Commenting Coordinator

Florida Fish and Wildlife Conservation Commission 620 S. Meridian Street

Tallahassee, FL 32399

**Transmitted** **via email to** *fwcconservationp/anninoservices@myfwc.com*

RE: LISTED SPECIES COORDINATION

 *Project Name: Suncoast Parkway – From SR 44 TO CR 486*

*FPID No.: 442764-1*

*Location: Township 18 S, Range 18 E, Sections 29, 30, 32*

*County: Citrus*

To Whom it May Concern:

The Florida Department of Transportation (FDOT), Florida’s Turnpike Enterprise, is proposing the construction of a four-lane limited-access divided toll facility that would extend the Suncoast Parkway 2 northward from its intersection with State Road (SR) 44 to County Road (CR) 486, a distance of approximately 2.4 miles (Figure 1). The project includes stormwater treatment facilities and an extension of the Suncoast Trail along the proposed alignment. The proposed project right-of-way (R/W) width is 350 ft and the project area is approximately 208 acres. The purpose of this new alignment is to extend Suncoast Parkway, which will increase mobility between the Tampa Bay region and Citrus County and relieve traffic congestion on local routes. R/W acquisition will be required. Permanent lighting is proposed to meet roadway safety criteria. FDOT Florida’s Turnpike Enterprise is seeking your review and comment on our finding that the project may affect state-protected resources. This project is also being coordinated with the U.S. Fish and Wildlife Service (FWS).

**Existing Conditions**

Seventeen land use and vegetative cover type classifications were mapped within the project area, based upon the Florida Land Use, Cover, and Forms Classification system (FLUCCS) data (Southwest Florida Water Management District 2014) (Figure 2). Approximately one-fourth of the project area was mapped as natural habitat, which is predominately upland hardwood forest (FLUCCS 4200 and 4340) with nine acres of long leaf pine – xeric oak forest (FLUCCS 4120). Natural habitats within the project area are in private ownership, are fire-suppressed and fragmented by lands modified or developed for human use. These land uses, including agriculture, mining, utilities, transportation, and residential development, comprise the remainder of the project area. Table 1 lists these land use classifications, as well as the approximate acreage and percentage of each land use designation within the project area.

**Table 1. Existing land use within the project area**

|  |  |  |  |
| --- | --- | --- | --- |
| **FLUCCS** | **Description** | **Acres** | **Percent of Project Area** |
| 1100 | RESIDENTIAL LOW DENSITY < 2 DWELLING UNITS PER ACRE | 18.9 | 9.1% |
| 1180 | RURAL RESIDENTIAL 2 TO 5 ACRES FOR EACH DWELLING | 15.5 | 7.4% |
| 1300 | RESIDENTIAL HIGH DENSITY | 0.1 | 0.03% |
| 1500 | INDUSTRIAL | 0.5 | 0.3% |
| 1600 | EXTRACTIVE | 68.0 | 32.7% |
| 1700 | INSTITUTIONAL | 0.4 | 0.2% |
| 2110 | IMPROVED PASTURES | 12.6 | 6.1% |
| 2120 | UNIMPROVED PASTURES | 9.9 | 4.8% |
| 3100 | HERBACEOUS | 11.7 | 5.6% |
| 3300 | MIXED RANGELAND | 8.5 | 4.1% |
| 4120 | LONGLEAF PINE - XERIC OAK | 9.1 | 4.4% |
| 4200 | UPLAND HARDWOOD FORESTS  | 7.8 | 3.8% |
| 4340 | UPLAND HARDWOOD - CONIFEROUS MIX | 31.7 | 15.3% |
| 4400 | TREE PLANTATION | 6.0 | 2.9% |
| 6530 | INTERMITTENT PONDS | 1.1 | 0.5% |
| 8100 | TRANSPORTATION | 1.4 | 0.7% |
| 8300 | UTILITIES | 4.7 | 2.2% |
|  | **Total** | 208 | 100% |

**Protected Species**

Literature and database searches were conducted using information from the FWS, the Florida Fish and Wildlife Conservation Commission (FWC), and the Florida Natural Areas Inventory (FNAI). Based on information collected from these sources, state and federally protected species that have historically been documented in the project area or may occur within or adjacent to the project area and the anticipated project impact, are discussed below.

Five state-listed species are documented from, or have the potential to, occur in the project area:

* Short-tailed snake *(Lampropeltis extenuate*): *May affect*
* Florida pine snake(*Pituophis melanoleucus mugitus*): *May affect*
* Southeastern American kestrel(*Falco sparverius paulus*): *May affect* (pending survey results)
* Florida burrowing owl(*Speotyto cunicularia floridana*): *No effect* (pending survey results)
* Gopher tortoise *(Gopherus polyphemus*): *May affect but not likely to adversely affect*

For the cryptic short-tailed snake and pine snake, Florida’s Turnpike Enterprise is assuming presence, thereby eliminating the need for population or density studies. Gopher tortoises and southeastern American kestrels have been documented within or near the project area. The nearest documented burrowing owl observation is over 6 miles south of the project area. Species-specific surveys for the southeastern American kestrel, Florida burrowing owl and gopher tortoise are proposed to determine presence within the project area. Florida’s Turnpike Enterprise will coordinate with FWC to request an Incidental Take Permit for impacted species.

Five federally listed species are documented from, or have the potential to, occur in the project area:

* Eastern indigo snake (*Drymarchon corais couperi*): *May affect*
* Florida scrub-jay (*Aphelocoma coerulescens*): *No effect* (pending survey results)
* Red cockaded woodpecker (*Picoides borealis*): *No effect*
* Bald eagle (*Haliaeetus leucocephalus*): *No effect*
* Wood stork (*Mycteria* a*mericana*): *No effect*

Preliminary project impact determinations for these species were discussed during a December 11, 2019 Go-To Meeting with FWS.

FWS records indicate an Eastern Indigo Snake (EIS) was observed within 1 mile of the project area in the 1990’s. Because of its cryptic nature, species-specific surveys for EIS are not proposed and it is anticipated that the proposed project will receive a **May affect** (A>B>C>D) determination based on the Eastern Indigo Snake Programmatic Key (2013).

Because four Florida scrub-jay groups were documented near the project area in the State Environmental Impact Report study in 1998, rigorous species-specific surveys were conducted in spring and fall 2007–2009. Surveys were repeated in spring 2014 based on agency approved survey methods. Survey results indicate that scrub-jays are no longer present within the proposed project area. However, Florida’s Turnpike Enterprise has initiated coordination with the FWS and will fulfill an existing Planning, Development and Environment (PD&E) commitment to survey all Type I Florida scrub jay habitat within the project area and all-natural habitat within ¼ mile of the Type I habitat. Pending these survey results, the project is anticipated to have **No effect**on the Florida scrub-jay.

A **No effect** determination is also anticipated for red cockaded woodpecker, bald eagle and wood stork because of lack of suitable habitat within the project area.

**Avoidance and Minimization Measures**

Unlike commercial or residential developments, the routing and construction of a highway system is often less flexible. Given the placement of the already constructed Suncoast Parkway, it is nearly impossible for FDOT to employ traditional avoidance measures, and some impacts could not be avoided.

Despite these restrictions, FDOT made a conscious effort to avoid and minimize impacts and expended considerable effort in the selection of the proposed final alignment and supporting facilities.

Some of the relevant minimization measures that FDOT will implement include the following:

* Following the Standard Protection Measures for Eastern Indigo Snake (FWS 2013)

during the construction of the Parkway. These protection measures will also be adapted to provide protection measures for the state-listed snake species. If an eastern indigo snake is discovered during project construction activities, the standard protection measures state that the FWS shall be contacted within one business day to obtain further guidance, which may result in further project consultation. In the event that a clutch of eastern indigo snake eggs is discovered while searching the apron of tortoise burrows for tortoise eggs, the snake eggs would be removed without rotation, placed in moist sand and taken to the Orianne Center for Indigo Conservation (OCIC) for incubation and captive rearing to benefit the OCIC eastern indigo snake reintroduction program. Agents authorized to temporarily handle eastern indigo snakes and their eggs for this purpose would be limited to the following qualified personnel: Biological Monitors, FWC-approved Gopher Tortoise Authorized Agents and their designated Assistants, and Environmental Inspectors with experience identifying and handling eastern indigo snakes.

* Installing and maintaining silt fence along the entire project boundary to help reduce wildlife interactions within the construction zone, in addition to the silt fence operating as an erosion and turbidity control measure.
* Limiting clearing and grubbing to only those areas necessary for construction.
* If survey results indicate kestrels are utilizing the project area, FDOT proposes installing kestrel nesting boxes adjacent to the Parkway to provide supplemental nesting habitat for this species.

**Mitigation Measures**

FDOT has committed to providing mitigation for unavoidable direct impacts associated with the project. Possible mitigation measures may include the purchase of habitat credits from an approved conservation bank, the acquisition of approved parcels that improve connectivity between or add to the inventory of existing public conservation lands or a monetary contribution. Gopher tortoises within the project area will be relocated to an FWC-approved, long-term recipient site prior to construction in accordance with the most current FWC permitting guidelines. A mitigation plan for unavoidable species will be developed through coordination FWS and FWC.

Your review and comment with the findings that this project is not likely to adversely affect state- protected resources will be greatly appreciated. Should you have any questions or comments concerning the proposed project, please contact Tiffany Crosby at 407-264-3828 or Tiffany.Crosby@dot.state.fl.us.

Sincerely,

Annemarie Hammond

Environmental Permits Coordinator

Florida’s Turnpike Enterprise

Attachments: Location Map, Land Use Map

cc: Terry Gilbert, FWC

Tiffany Crosby, Atkins