

From: [Van Der Wiele, Cynthia](#)
To: [Ornella, Michael A II CIV USARMY CESAJ \(USA\)](#)
Subject: [Non-DoD Source] Re: SAJ-2008-02431 Tarpon Blue Silver King I, LLC Mixed Use Community
Date: Friday, November 15, 2024 4:06:57 PM
Attachments: [image001.png](#)
Importance: High

Good afternoon Michael,

The Rural Lands West / Tarpon Blue project site consists of approximately 10,148.02 total acres. Freshwater wetland systems comprise approximately a total of 4,490.66 acres or approximately 44 percent of the project site. As noted in the PN, the applicant proposes seeks authorization to discharge fill over approximately 116.86 acres of wetlands and other waters and the excavation of approximately 159.19 acres for a total of 274.27 acres of impacts to wetlands and water features for the construction of a mixed-use community. The proposed impacts are primarily associated with infrastructure improvements to allow for road crossings and construction of the project's surface water management system.

The applicant has provided the following information in support of efforts to avoid and/or minimize impacts to the aquatic environment: Rural Lands West follows the rural planning strategy adopted for the Collier County Rural Lands Stewardship Area (RSLA) overlay, which is specifically designed to minimize impacts of development to natural systems. However, while the narrative describes adopted county development model, it does not discuss site design alternatives that would lead one to arrive at the conclusion that the depicted site design is the Least Environmentally Damaging Practicable Alternative (LEDPA). For example, one method of avoiding and reducing impacts is to design the site as a conservation subdivision. Further, the PN does not describe the methodology used to determine high or lower habitat or wetland values. It is also not clear whether remaining wetlands that are bisected will maintain hydraulic and hydrologic connectivity as this is not indicated in the graphics. With regard to compensatory mitigation, the applicant did not describe the stepwise process [as is typical with the 2008 Mitigation Rule in which the first preference is with mitigation banks and the least preferable is on-site permittee responsible mitigation and preservation] to arrive at the conclusion that the proposed compensatory mitigation is the only option. However, it seems that due to the location of the site within the [rapidly-shrinking] habitat and ranging area of the Florida panther and other listed species, that a discussion to determine a compensatory mitigation scheme that would yield the optimal outcome for both listed species and aquatic resources would be beneficial before issuing a permit under Section 404 of the Clean Water Act.

Finally, it is not clear whether the US Fish and Wildlife Service has completed a Biological Opinion regarding this project or the cumulative impact of proposed projects in the region.

The EPA believes that further information regarding the above issues is merited given the size and magnitude of the proposed project.

V/r,
Cynthia

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Please contact me through Microsoft Teams between my normal working hours of 08:00 - 17:30.



United States Environmental Protection Agency