



FLORIDA NATIVE PLANT SOCIETY

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May 2, 2025

Jazlyn Heywood, P.E., Project Manager
Florida's Turnpike Enterprise
Post Office Box 613069
Ocoee, Florida 34761-3069

SUBJECT: Alternative Corridor Evaluation for the Central Polk Parkway East

Dear Ms Heywood:

The Florida Native Plant Society has reviewed the alternative corridors being considered for the Central Polk Parkway East Extension and concluded that Corridor A is the only potentially acceptable alternative. The other alternatives (B-F) would result in far too many impacts to environmentally sensitive areas, including especially the projected impacts on habitat for critically imperiled plant species.

Figure 1 delineates the six routes designated as A, B, C, D, E and F. Each of these would impact environmentally sensitive areas as illustrated graphically in Figure 2. The data used to construct the chart in Figure 2 was derived from the Evaluation Matrix provided by Florida's Turnpike Enterprise (FTE). Although this analysis does not include the recently added alternatives E and F, we observed that they overlap extensively with alternatives B and C and would result in impacts similar in scope and scale. We have seen no indication that FTE is considering a "no build" alternative and believe "no build" should be part of the discussion. If you do proceed with the project, we must strongly recommend you choose Alternative A.

Your own Evaluation Matrix indicates that Alternative A would result in far fewer impacts than the other alternatives. For example, Alternative D would result in nearly double the impact on environmentally sensitive areas. Direct impacts to existing conservation lands range from a low of zero acres for Alternative A" to 67.58 acres for Alternative D. "D" would eliminate 55.9 acres in the Horse Scrub Tract, 9.03 acres in the Marion Creek Wildlife Management area and 2.75 acres in the Lake Wales Ridge National Wildlife Refuge. Routes "B" and "C" would each eliminate 6.77 acres in the Serenoa Preserve and 0.16 acres in the Horse Creek Scrub Tract.

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Central Polk Parkway - Corridors Impact on the Florida Wildlife Corridor

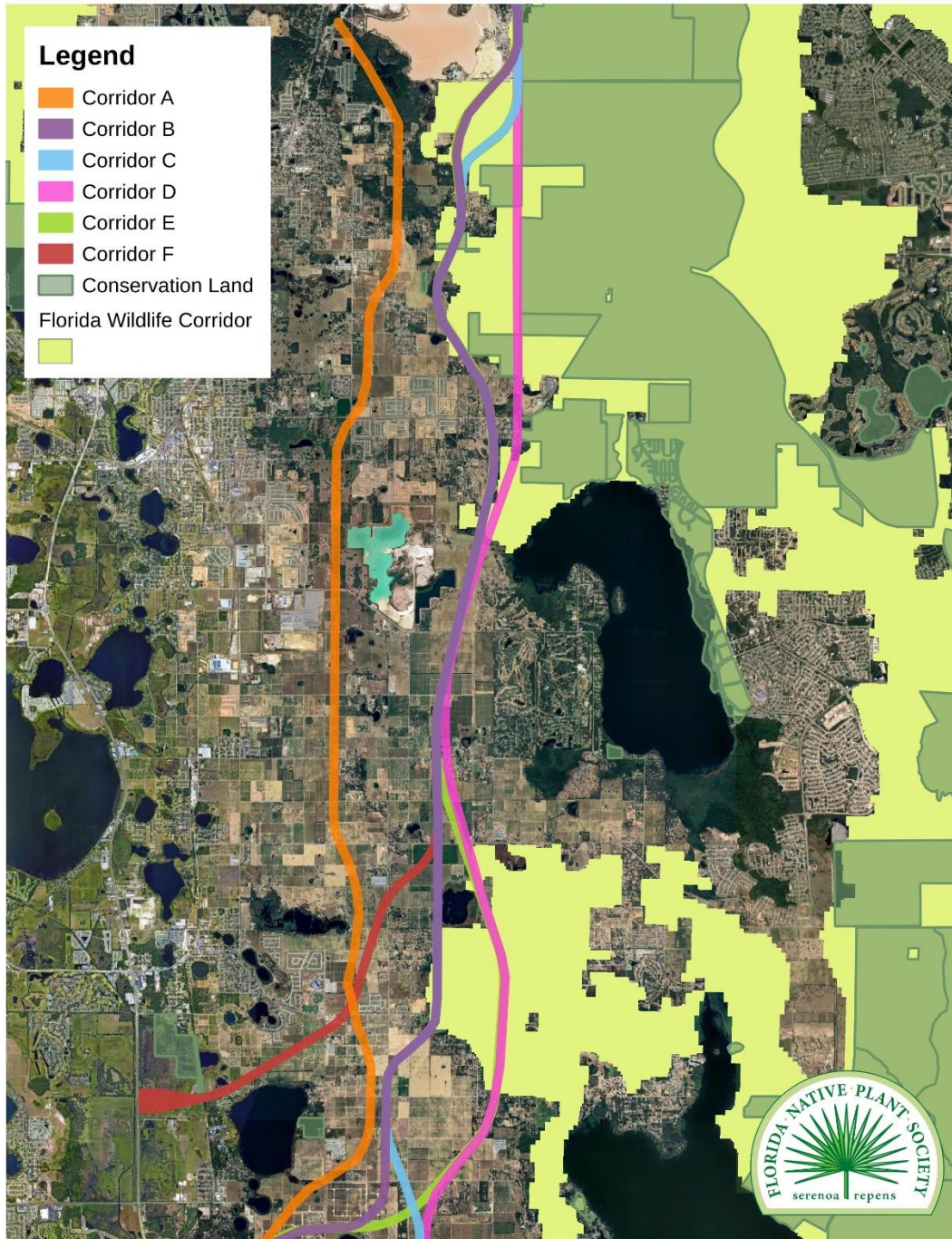


Figure 1. Overview of Alternative Corridors and Potential Impacts to Conservation Land and Unprotected Portions of the Florida Wildlife Corridor.

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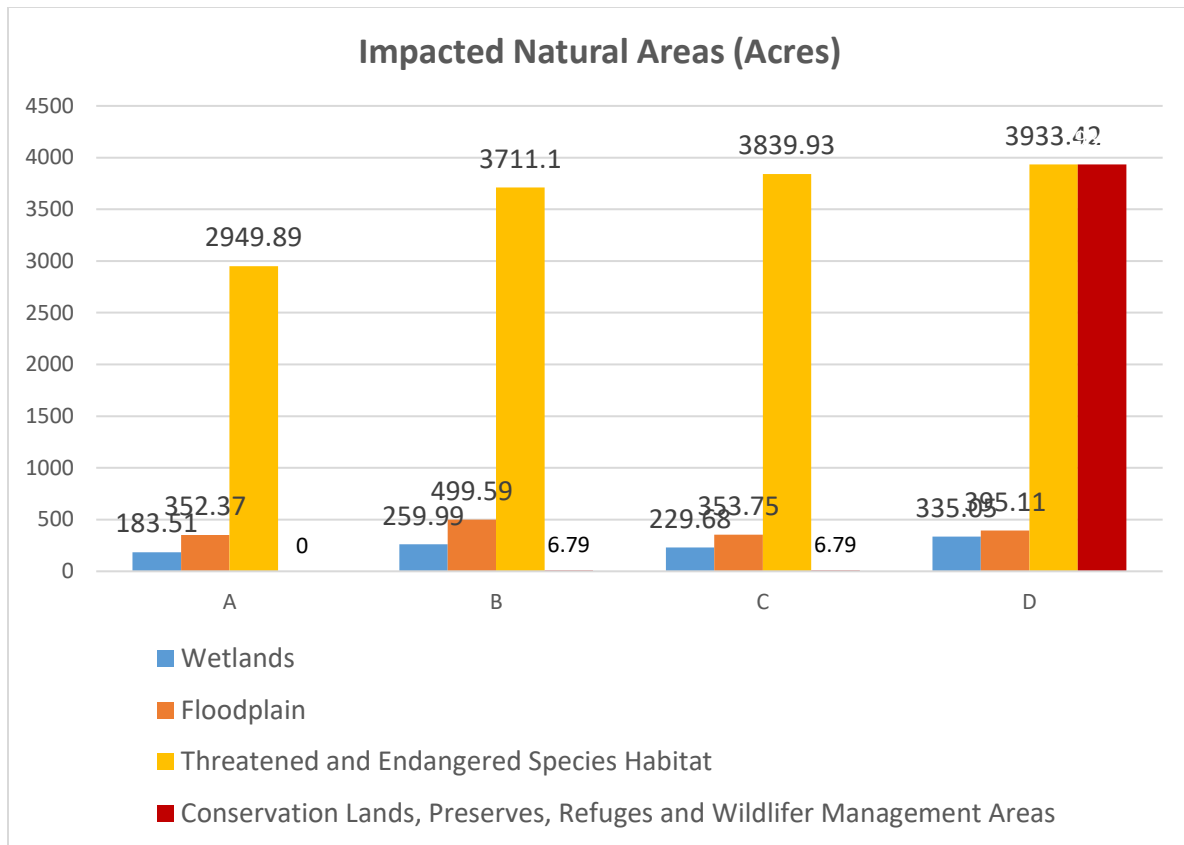


Figure 2. Impacts to wetlands, floodplains, imperiled species habitat and conservation lands resulting from proposed construction of the Central Polk Parkway extension. Data derived from Evaluation Matrix provided by Florida's Turnpike Enterprise.

Other conservation areas proximate to the alternative corridors include the Barbara B. Pedersen Wildlife Preserve (A); Reedy Creek Mitigation Bank and Barbara B. Pedersen Wildlife Preserve (B, C and D); Bok Tower Gardens Pine Ridge Preserve (C and D); and the Sherwood L Stokes Preserve ("D"). Proximity to these protected conservation areas would greatly limit the ability to manage these areas with prescribed fire, which is essential to maintaining their habitat viability and overall ecological value. Highway construction would also spur residential and commercial development in nearby areas, further impacting the conservation values of these lands by severing wildlife corridor connections and imposing additional constraints on the use of prescribed fire. Figure 1 illustrates the direct impacts the various alternatives would have on unprotected portions of the Florida Wildlife Corridor.

As noted, FNPS is particularly concerned about projected impacts to critically imperiled, narrowly endemic plant species. Table 1 identifies the plant species that would potentially be affected and includes their listing status. Of particular concern is the presence of one of Florida's most endangered plant species. The blushing scrub balm (*Dicerandra modesta*) is

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BOTANICAL NAME	COMMON NAME	FEDERAL STATUS	STATE STATUS
<i>Chionanthus pygmaeus</i>	pygmy fringe tree	LE	LE
<i>Clitoria fragrans</i>	Scrub pigeon-wing	LT	LE
<i>Eriogonum longifolium</i> <i>var.gnaphalifolium</i>	Scrub buckwheat	LT	LE
<i>Nolina brittoniana</i>	Florida beargrass	LE	LE
<i>Paronychia chartacea</i> var. <i>chartacea</i>	Paper-like nailwort	LT	LE
<i>Polygala lewtonii</i>	Lewton's polygala	LE	LE
<i>Prunus geniculata</i>	Scrub plum	LE	LE
<i>Schizachyrium niveum</i>	Scrub bluestem	N	LE
<i>Stylisma abdita</i>	Scrub stylisma	N	LE
<i>Warea amplexifolia</i>	Clasping warea	LE	LE
<i>Conradina etonia</i> (Cultivated)	etonia rosemary	LE	LE
<i>Dicerandra modesta</i> (Cultivated)	Blushing scrub balm	LE	LE
<i>Ziziphus celata</i> (Cultivated)	Scrub ziziphus	LE	LE
<i>Chionanthus pygmaeus</i>	pygmy fringe tree	LE	LE
<i>Illicium parviflorum</i>	Star anise	N	LE
<i>Lobelia cardinalis</i>	Cardinal flower	N	LT
<i>Ophioglossum palmatum</i>	Hand fern	N	LE
<i>Osmunda cinnamomoea</i>	Cinnamon fern	N	CE
<i>Osmunda regalis</i>	Royal fern	N	CE
<i>Rhaphidophyllum hystrix</i>	Needle palm	N	CE
<i>Tillandsia fasciculata</i>	Cardinal airplant	N	LE
<i>Tillandsia utriculata</i>	Giant airplant	N	LE

Table 1. Listed Plant Species Potentially Impacted by Proposed Highway Construction Within the Alternative Corridors. LE – Listed Endangered, LT – Listed Threatened, N – Not Listed, CE – Commercially Exploited

listed as Endangered under the US Endangered Species Act and known to occur naturally at only one location – the Lake Marion Creek Wildlife Management Area. It is the only known
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population within the species' entire geographic range and is likely the last wild population in existence. FNPS has been engaged in a joint project with the Florida Forest Service to monitor the species and enhance habitat conditions. Alternative D would bisect the blushing scrub balm's only known habitat and effectively preclude the future use of prescribed fire to manage this species, as well as other endemic scrub species listed in Table 1 that co-occur with the blushing scrub balm. Figure 3 depicts the locations of the proposed alternative corridors relative to the known habitat of the blushing scrub balm.

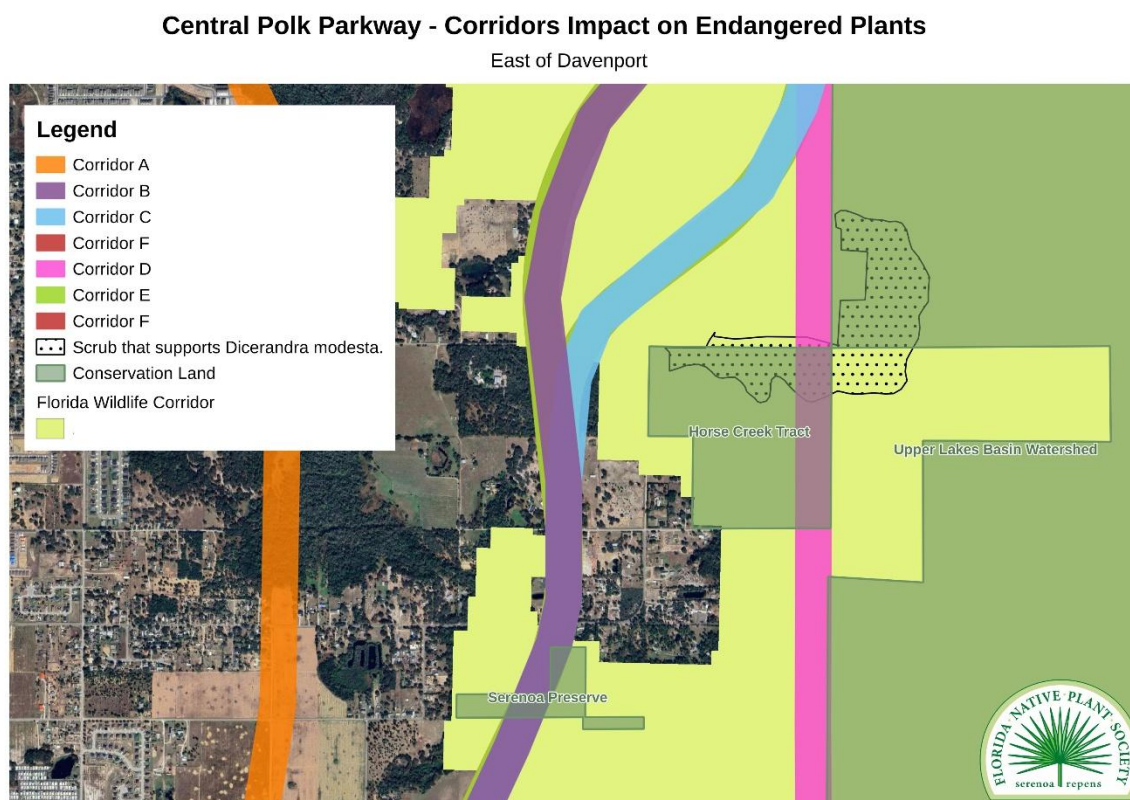


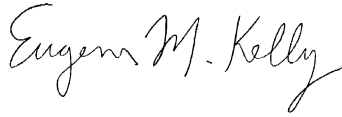
Figure 3. Location of Alternative Corridors Relative to Blushing Scrub Balm Habitat.

Significant occurrences of many of the plants listed in Table 1 are also present on private land that would experience direct impacts from road construction within Alternatives B, C, E and F. The 34.4-acre property is owned by William and Nancy Bisset and protected under a conservation easement held by the Green Horizon Land Trust. The northernmost parcel of the property is designated the Serenoa Preserve and is labeled as such in Figure 3. Although part of the property is managed as a nursery specializing in the propagation and sale of native plants, most of it supports functional habitat including mixed hardwood swamp, xeric oak hammock, scrub, scrubby flatwoods and sandhill. Several small streams pass through the nursery area that eventually flow into Snell Creek and could be affected by hydrologic impacts associated with highway construction. Most of the species listed in Table 1 are present on the property.

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FNPS appreciates the opportunity to review and comment on the proposed alternative corridors and suggests choosing a “no build” alternative. If the road is ultimately constructed, Alternative A is the only option for avoiding significant impacts to a large number of Florida’s most imperiled and unique plant species.

Respectfully,

A handwritten signature in black ink that reads "Eugene M. Kelly". The signature is written in a cursive, flowing style.

Eugene M. Kelly, President
Florida Native Plant Society

cc: Jared W. Perdue, P.E., Secretary, Florida Department of Transportation
Henry Pinzon, Environmental Management Engineer, Florida Turnpike Enterprise