

March 2, 2007

Steve Wilson
HDR Engineering
109 Harrison Avenue
Panama City, Florida 32401-2726

Dear Mr. Wilson:

The Clean Water Network of Florida, Inc. offers the following comments regarding the Northwest Florida Transportation Corridor Authority's proposed transportation corridors and the final master plan. It appears that the Authority is offering very little time for the public to become familiar with these proposals, digest the scant information they offer and then provide meaningful comments. Your recommendation will apparently will be made between now and March 15th. There is **NO OPPORTUNITY** for the public to review and comment on your recommendation for the proposed Final Master Plan before it is presented to the Authority for approval on March 15. This gives the impression that the Authority does not really want public input on your recommendation. This leads a citizen to ask what other opportunity exists for meaningful participation in this process? A Chapter 120 hearing? If that is our only other forum, then please let me know as soon as possible when the Authority considers the window to open for a citizen or organization to file a Chapter 120 petition for an administrative hearing.

A more reasonable schedule would be to offer the public ample opportunity to review and comment on the proposed Final Master Plan that HDR Engineering will deliver on or before the March 15th meeting. This public review time should be at least 30 days to review the Final Master Plan and then postpone the final approval hearing until after the public has had time for its review. This could give the Authority the opportunity to meet its stated objectives in the Goals and Objectives on the NWFTCA website which are to **“provide for early, continuing, timely, and proactive opportunities in the Master Plan process for the public to express their views and become educated on the issues and potential solutions”**. In addition, another of the objectives listed in the Goals and Objectives on the NWFTCA website seeks to “Improve transportation access to rural and economically distressed counties and communities in the northwest Florida region ...**in a manner that reflects regional and community visions**”. You will get the best sense of what those regional and community visions are if you give the taxpayers from the region a meaningful opportunity to participate in the decision-making. I doubt seriously that Governor Crist will approve of your rush to make these important decisions without adequate public input.

Common sense, if not state and federal law requires decisions about major new transportation corridors to be based on sound land-use planning and existing transportation needs. It appears from your proposals that your primary goal is to provide infrastructure for future development on St. Joe properties that are currently inaccessible or have limited access. The state and its taxpayers should not be subsidizing development for St. Joe. Florida, and particularly the panhandle have real transportation needs that should be addressed with our precious tax-dollars.

Hurricane evacuation is a valid reason to re-evaluate current transportation routes, especially since the state and local governments have all but abandoned any effective review of adequate hurricane evacuation routes before new developments are approved. This has resulted in inadequate roads leading out of coastal high hazard areas where the majority of new developments have been (and continue to be) located. None of these alternatives adequately solve this problem, perhaps because a major goal of this work was to provide infrastructure in currently undeveloped areas of the Panhandle, which will lead to new developments and more traffic but not necessarily abate existing problems. A four lane highway parallel to Hwy 20 would provide the most logical, shortest and most cost effective route between Pensacola and Tallahassee, which appears to be one of your goals. The 4-laning of North/South roads such as Hwy 87 in Santa Rosa County, Hwy 331 in Walton County, Hwy 77 or 79 in Bay/Washington Counties, etc on across the counties to the east, would provide adequate hurricane evacuation if the state and local governments would limit future development in the high hazard coastal areas of these counties.

This transportation corridor should not be created in a vacuum. It should be done in conjunction with sound land-use planning, with the land-use planning leading the way. Building a major turnpike through north Bay County for the sole purpose of providing infrastructure for the proposed Bay County airport will squander our transportation tax-dollars on an unwanted¹ and unneeded project. This corporate welfare, airport scam is in litigation and if justice prevails, it will be denied the environmental permits, final FAA approvals and funding that it will require. Once that responsible decision is made, there will be no need to build a U-shaped turnpike through north Bay County (and across the headwaters of West Bay).

Another major consideration that must be addressed is the environmental impacts that all of your proposals will have on the riverine and estuarine systems along the Panhandle. The Panhandle has some of the last fairly clean rivers and estuaries in the state. These resources must be protected – by law and by common sense. Building east-west corridors through large tracts of wetlands will impede ground and surface water flow from north to south. This impediment will cause massive adverse impacts to the near-shore waters of the Gulf of Mexico. Some of these waters are among the most diverse and productive waters found in North America. St. Andrews Bay is among the six most diverse estuaries in our hemisphere. Apalachicola Bay is an extremely valuable shellfish harvesting resource. Development opportunities and economic windfalls for a handful of special interests do not outweigh the value of these resources. You only need to look at the impact Alligator Alley in South Florida had on Florida Bay to get a snap-shot of what another major thoroughfare through NW Florida's wetlands could do to our estuaries. The cumulative impact of these roads will further degrade these valuable resources.

While it is obvious to those of us who live in South Santa Rosa and Okaloosa Counties that something needs to be done about the traffic problems on Hwy. 98, your proposals offer little relief. Much of the traffic on Hwy 98 in Santa Rosa and Okaloosa Counties is local traffic – people traveling to and from work and the alternative routes will do little or nothing to alleviate the traffic problems in that area which are the result of poor and/or no land use planning by local

¹ Voters in Bay County voted against relocating their airport to the West Bay location.

governments. Some through traffic may take an alternative toll road, but it would seem that most of that traffic would already be using I-10.

Alternatives #2, #3 and #4 are all longer routes than the two existing routes and have unacceptable environmental consequences as well as contributing to sprawl in environmentally sensitive areas. Alt #3 and #4 would require slicing through Point Washington State Forest and a lot of high quality wetlands that drain into Choctowhatchee Bay.

Alternatives #3 and #4 are even more hideous in that there is absolutely no reason/transportation need to create an alternative north of I-10 between Milton and Pensacola. The only reason for this new road would be to encourage sprawl. Your proposed route will impact environmentally sensitive areas and encourage development in these areas that are inappropriate for development.

Alternative #4 – this scenario assures the greatest adverse impacts to the natural resources of the Apalachicola Basin. It proposes an entirely new road well north of the present US Highway 98, a new bridge across the Apalachicola River and a new piece of road down from the new corridor to Apalachicola or East Point. Apparently this road would most likely go through Tate's Hell State Forest. This alternative would cause direct and indirect impacts to wildlife and would dramatically diminish the pristine, natural, relatively undisturbed character of the lands north of the coast on both sides of the Apalachicola River.

Our suggestion is that you go back to the drawing board. If you proceed with any of these alternatives your efforts will be hindered by public opposition and litigation. You will need both state and federal permits and the federal permits will require an EIS, a thorough review of practicable alternatives, endangered species analysis and more. Our organization is committed to seeing that these protections which are guaranteed to the citizens of Florida, will be fully utilized.

Sincerely,

Linda L. Young
Director

cc:

Governor Charlie Crist
Dept. of Community Affairs Secretary Thomas Pelham
Carl Wernicke, Pensacola News Journal
Tom McLaughlin, Northwest Florida Daily News
Gabriel Tines, Walton Sun
Bruce Ritchie, Tallahassee Democrat
Timothy Croft, Port St. Joe Star
Celeste Cobena, Beach to Bay Connection, Inc.
Dan Tonsmeire, Apalachicola Riverkeeper, Inc.
Aaron Deslatte, Gannett Newspapers, Tallahassee

Allen Jelks, Attorney at Law, Panama City
Charlene Walker, League of Women Voters
Craig Pitman, St. Pete Times
Mike Odom, Navarre Press