



NATURAL RESOURCES DEFENSE COUNCIL

Randall A. McElheney  
Chairman NWFTCA  
C/O HDR Engineering  
109 Harrison Avenue  
Panama City, FL 32401

March 29, 2007

*VIA ELECTRONIC MAIL*

Dear Chairman McElheney:

These comments on the Northwest Florida Transportation Corridor Authority's ("NFTCA") recommended master plan are submitted on behalf of the Natural Resources Defense Council, Inc. ("NRDC"), a national environmental organization with more than 650,000 members nationwide, including more than 29,000 members residing in Florida. NRDC is dedicated to the preservation, protection, and defense of the environment and natural resources.

NRDC is very concerned about the NFTCA's recommended master plan and the effects that it would have on the region's tremendous biodiversity and aquatic resources. As you know, the Florida Panhandle is one of the most biologically diverse regions in the country and is home to a variety of ecosystems, ranging from rare coastal dune lakes to cypress swamps. The region provides habitat for twenty-eight species identified as endangered under the Endangered Species Act, including the green turtle, red-cockaded woodpecker, wood stork, and the ivory-billed woodpecker, as well as fifteen threatened species, including the American alligator and loggerhead turtle. Nevertheless, the recommended master plan was designed without any attempt to avoid and minimize impacts to wildlife, aquatic resources, and conservation lands.

The NFTCA's enabling statute provides

The primary purpose of the authority is to improve mobility on the U.S. 98 corridor in Northwest Florida to enhance traveler safety, identify and develop hurricane evacuation routes, promote economic development along the corridor, and implement transportation projects to alleviate current or anticipated traffic congestion.

Chapter 343.82, Fla. Stat. However, instead of focusing on solving the problems with U.S. 98, the recommended master plan is designed to facilitate travel to the controversial proposal to construct a new airport at the West Bay site in Bay County, and to encourage sprawl in undeveloped portions of the Panhandle that are dominated by wetlands and serve as important

wildlife habitat. NFTCA's plans for alleviating congestion should not assume that a new airport will be built at the West Bay site because the project violates strict natural resource protections in the Airport and Airways Improvement Act that prevent the FAA from approving the project because there are feasible alternatives that would result in far less damage to the natural environment.

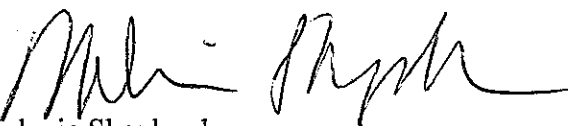
NRDC is particularly concerned about two projects identified on the recommended master plan map. (1) The "West Bay Bypass," project 38 on the recommended master plan map, would be a new 16.20 mile four lane highway that NFTCA would like to build to connect US98 and CR30A, running from the coast east to the proposed airport. (2) The Freeport-West Bay Connector, project 40 on the recommended master plan, also a new four lane highway, would stretch 31.30 miles, from the West Bay site proposed for a new airport in Bay County north to Ebro and Freeport. The recommended master plan map illustrates that the proposed airport is the central landmark to which the proposed highways lead, showing beyond doubt that the new highway projects are designed to provide a new transportation corridor to the proposed airport. Remarkably, even though the NFTCA indicates that it has been working on its master plan since 2005, the FAA did not consider the impacts of these highways that are connected to the proposed airport in its Environmental Impact Statement disclosing the impacts of the proposed airport.

The recommended master plan's proposal to build a new four lane highway north of West Bay across the Choctawhatchee River is particularly troubling because it would impact conservation lands and habitat for the critically endangered ivory-billed woodpecker. Researchers from the University of Auburn and Windsor University announced in September 2006 that they had sighted the ivory-billed woodpecker in bottomland swamps along the Choctawhatchee in the same vicinity as the area NFTCA has identified for a new four lane highway. Details of their ongoing research and continued sightings can be found at <http://www.auburn.edu/ivorybill>. At twenty inches in length with a thirty-one inch wingspan, ivory-billed woodpeckers are the largest woodpeckers known to inhabit the United States. Until recently, ornithologists widely believed the ivory-billed woodpecker to be extinct.

In sum, the recommended master plan would not achieve the goals of alleviating congestion on U.S. 98 and providing hurricane evacuation routes and the plan would have devastating impacts on wildlife, aquatic resources, and conservation lands that are unacceptable. The recommended master plan should be abandoned by NFTCA in favor of an approach that would achieve NFTCA's goals and be designed to avoid an minimize impacts to wildlife, aquatic resources, and conservation lands.

Thank you for considering NRDC's views. Please keep me informed of additional public notices and developments regarding the master plan.

Sincerely,



Melanie Shepherdson  
Staff Attorney