

Appendix B: Efficient Transportation Decision Making
(ETDM) Summary Report

ETDM Summary Report

Project #12597 - SR 87 Connector

Finalized Programming Screen - Published on 10/13/2011

Generated by Peggy Kelley (on behalf of FDOT District 3)

Printed on: 10/14/2011

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Introduction to Programming Screen Summary Report

The Programming Screen Summary Report shown below is a read-only version of information contained in the Programming Screen Summary Report generated by the ETDM Coordinator for the selected project after completion of the ETAT Programming Screen review. The purpose of the Programming Screen Summary Report is to summarize the results of the ETAT Programming Screen review of the project; provide details concerning agency comments about potential effects to natural, cultural, and community resources; and provide additional documentation of activities related to the Programming Phase for the project. Available information for a Programming Screen Summary Report includes:

- Screening Summary Report chart
- Project Description information (including a summary description of the project, a summary of public comments on the project, and community-desired features identified during public involvement activities)
- Purpose and Need information (including the Purpose and Need Statement and the results of agency reviews of the project Purpose and Need)
- Alternative-specific information, consisting of descriptions of each alternative and associated road segments; an overview of ETAT Programming Screen reviews for each alternative; and agency comments concerning potential effects and degree of effect, by issue, to natural, cultural, and community resources.
- Project Scope information, consisting of general project commitments resulting from the ETAT Programming Screen review, permits, and technical studies required (if any)
- Class of Action determined for the project
- Dispute Resolution Activity Log (if any)

The legend for the Degree of Effect chart is provided in an appendix to the report.

For complete documentation of the project record, also see the GIS Analysis Results Report published on the same date as the Programming Screen Summary Report.

#12597 SR 87 Connector

District	District 3	Phase	Programming Screen
County	Santa Rosa	From	SR 87S or SR 87S/US 90
Planning Organization	FDOT District 3	To	SR87N/US90 or SR87N/Southridge
Plan ID		Financial Management No.	41674832201
Federal Involvement	Federal Permit Federal Action Federal Funding		
Contact Information	Name: Peggy Kelley Phone: (850) 415-9517 E-mail: peggy.kelley@dot.state.fl.us		
Project Web Site	http://www.sr87connector.com/		

Snapshot Data From: Programming Screen Summary Report Re-published on 10/13/2011 by Peggy Kelley

Overview

Legend	Evaluation of Direct Effects																	Secondary and Cumulative Effects			
	Natural							Cultural				Community									
	Air Quality	Coastal and Marine	Contaminated Sites	Farmlands	Floodplains	Infrastructure	Navigation	Special Designations	Water Quality and Quantity	Wetlands	Wildlife and Habitat	Historic and Archaeological Sites	Recreation Areas	Section 4(f) Potential	Aesthetics	Economic	Land Use		Mobility	Relocation	Social
N/A N/A / No Involvement																					
0 None (after 12/5/2005)																					
1 Enhanced																					
2 Minimal (after 12/5/2005)																					
3 Moderate																					
4 Substantial																					
5 Dispute Resolution (Programming)																					
ETAT Review Period: 12/17/2009 - 01/31/2010. Re-Published: 10/13/2011																					
Alternative #1 - # 1 Segments 1a, 1b, and 1c) From SR87S/US90 to SR 87N/SR 89S	2	2	2	2	4	1	3	3	4	4	4	3	3	3	2	1	2	1	2	3	4
Alternative #2 - # 2 (Segments 1a, 1b, and 2a) From SR87S/US90 to SR 87N/SR 89N	2	2	2	2	4	1	2	3	4	4	4	3	4	3	2	1	2	1	2	3	4
Alternative #3 - # 3 (Segments 1a and 3a) From SR87S/US90 to SR 87N north of Whiting Field	2	2	3	3	4	1	2	4	4	4	4	3	5	4	2	1	2	1	2	3	4
Alternative #4 - # 4 (Segments 4a and 4b) From SR87S/US90 to SR 87N/US 90	2	2	2	2	4	1	4	3	4	5	4	4	4	4	3	1	3	1	2	3	5
Alternative #5 - #5 (Segments 4a and 4c) From SR87S/US90 to SR 87N/US 90	2	2	2	2	4	1	3	3	4	5	4	4	4	4	3	1	3	1	2	3	5
Alternative #6 - #6 (Segments 4a, 4b, and 5a) From SR87S/US 90 to SR87N/US 90, & US90/Glover Ln.	2	2	2	2	4	1	3	3	4	5	4	4	4	4	3	1	3	1	2	3	5

Project Description Data

Description Statement

Project Description Summary

This project includes a proposed new roadway in Santa Rosa County. It is currently MPO Priority #9. The Project Development and Environment Study (PD&E) and a portion of the Design phase are the only phases in the 2020 Cost Feasible Plan. It is anticipated that the new roadway will be a two-lane facility with right-of-way for a future four-lane divided facility.

SR 87 Description

The existing SR 87 is primarily a south-north rural minor arterial roadway located in Santa Rosa County, Florida. The road extends from US 98 along the Gulf Coast to the Florida/Alabama State line. (See SR 87 Reference Maps, Map Number 1) The existing roadway combines multiple rural and urban cross-sections, but generally is rural in nature with the exceptions through the Town of Milton. SR 87 serves as a corridor for freight movement. The truck traffic along the SR 87 route ranges from 7.88% on the segment between I-10 and US 90, to 5.51% on US 90/SR 87, and 13.44% on SR 87N. However, it should also be noted that only the segment south of I-10, is part of the SIS.

In the Study Area (See SR 87 Reference Maps, Map Number 2), the segment of SR 87S from I-10 north to US 90 is four-lane divided, and has an Access Classification of 4. At US 90, SR 87S utilizes the US 90 alignment for approximately 4.6 miles and heads west over the Blackwater River, through the historic district of Milton to where it intersects with SR 87N. This segment is mostly a two-lane undivided roadway, and has Access Classifications of 4 and 6. From US 90, SR 87N runs north approximately 27.4 miles to the Florida/Alabama State line. The segment between US 90 and the southern SR 89 intersection, approximately 3.5 miles, is a five-lane urban section, and has an Access Classification of 6. The segment between the southern SR 89 split and Langley Street is a four-lane divided rural section, with an Access Classification of 4. It should be noted the segment from Langley Street to the Alabama State line is currently under-going a PD&E Study to increase its capacity from a two-lane undivided facility to a four-lane divided facility.

SR 87 serves as one of the State's primary emergency evacuation routes enabling evacuations from the coastline, north into Alabama and a host of other northern destinations. SR 87 also serves local and interregional traffic, from destinations such as the Gulf Coast, the Town of Milton, and the Naval Air Station Whiting Field, to I-10.

Subject Project

Currently, the US 90/SR 87 alignment has a failing level of service (LOS F) negatively impacting travel. In an effort to improve emergency evacuation, and to more effectively meet area commuter's needs, the Florida Department of Transportation is conducting this Project Development and Environment Study to evaluate the potential for providing a new corridor for the missing link of SR 87. The study area, as shown in Figure 2, extends from a southern boundary just north of I-10 along SR 87S; to the intersection of Southridge Road and SR 87N to the north; just west of SR 87N to the west; and just east of SR 87S to the east.

In addition to the No-build alternative and the Transportation System Management (TSM) alternative along the existing alignment, a number of new corridors will be identified and evaluated for improved mobility and safety. See Figure 3. SR 87 Connector Alternative Corridors Location Map.

As shown in the Alternative Corridors Location Map (See SR 87 Reference Maps, Map Number 3), Corridor 1 will extend north from the US 90/SR 87S intersection crossing the river in proximity of the existing eastern power easement crossings. Once across the river it will run parallel, or adjacent to the power easement, then connect with SR 87N in proximity of the southern split of SR 87N and SR 89 utilizing the Manning Lane right-of-way. This corridor would be roughly 6.5 miles in length.

Much like Corridor 1, Corridor 2 will also extend north from the US 90/SR 87S intersection crossing the river in proximity of the eastern most existing power easement crossing. Once across the river it will run slightly north of Corridor 1, and run adjacent to the Clear Water Creek environmental lands, where it then heads west to connect with SR 87N in proximity of the northern split of SR 87N and SR 89. This corridor would be roughly 7.2 miles in length.

Like Corridors 1 and 2, Corridor 3 will extend north from the US 90/SR 87S intersection crossing the river in proximity of the eastern most existing power easement crossing. Once across the river, the corridor will proceed north on the east side of Whiting Field possibly utilizing portions of the Pat Brown Road right-of-way. Once north of Whiting Field, the corridor will seek passage through a narrow gap between the Nature Conservancy/Florida Forever Lands and Whiting Field to a point where it then can be rejoined with SR 87N north of Whiting Field and south of Southridge Road. This corridor would be around 10.5 miles in length.

Corridor 4 will evaluate areas to the south of US 90, and will involve a new river crossing between Bagdad and Milton. The southern corridor will generally head west from SR 87S using a portion of the US 90 right-of-way than can accommodate widening, and reconnect with SR 87N at the US 90/SR 87N intersection. The western end of this corridor near SR 87N will utilize the right-of-way of the Blackwater Heritage Trail, and incorporating the trail into the roadways cross section. This corridor may be approximately 5.6 to 6.5 miles in length depending on which option is selected. (The options for this corridor include Alternative 4, Alternative 5, or Alternative 6.)

Additional Financial Project Numbers associated with this project: 41674832202, 41674842201, and 41674842202.

Summary of Public Comments

February 25, 2010: A Project Kick-off Meeting was held with the Santa Rosa County Commission

March 9, 2010: A Project Kick-off Meeting was held with the Milton City Council

March 10, 2010: A project Presentation was given at the Florida-Alabama Transportation Planning Organization

March 23, 2010: A Public Kick-off Meeting was conducted at the Santa Rosa County Auditorium. To see public comments go to Project Documents Section and refer to Public Involvement Comments published on June 8, 2010.

January 27, 2011: The public Corridor Alternatives Meeting was conducted at the Santa Rosa County Auditorium.

Consistency

- Consistency with Air Quality Conformity is unknown.
- **CONSISTENT, WITH COMMENTS** with Coastal Zone Management Program.
 - Comment: Based on the information contained in the AN and associated state agency comments, the state has no formal objections to allocation of federal funds for the subject project and, therefore, the funding award is consistent with the Florida Coastal Management Program (FCMP). The applicant must, however, address the concerns identified by our reviewing agencies prior to project implementation. The state's continued concurrence with the project will be based, in part, on the adequate resolution of issues identified during this and subsequent reviews. The state's final concurrence of the project's consistency with the FCMP will be determined during the environmental permitting process.
 - Submitted By: FL Department of Environmental Protection
 - Comment Date: 2010-02-05 16:26:48.0
- **Not consistent** with Local Government Comp Plan.
 - Comment: Consistency review for proposed State Road 87 Connector project Reviewed for consistency with the Santa Rosa County Comprehensive Plan and the City of Milton Comprehensive Plan The State Road 87 Connector ETDM project is a proposed new roadway in Santa Rosa County which consists of six alignment alternatives associated with this review. The project is intended to provide an alternative to the existing shared facility of State Road 87 and US 90 which currently operates at a failing level of service. The indicated need for a new corridor is to provide additional capacity and improve regional connectivity. Alternatives 1, 2 and 3 identify alternative connections to State Road 87 and US 90, which are located northeast of the City of Milton. Alternatives 2 and 3 traverse areas adjacent to Florida Forever lands. Alternatives 4, 5 and 6 connect State Road 87 to US 90 south of the City of Milton crossing the Blackwater River. The alternatives south of Milton are intended to route traffic around the City of Milton Historic District. A portion of State Road 87 is identified in the Santa Rosa Comprehensive Plan 2008-2025 Comprehensive Plan Capital Improvements Element as a Federal earmark multi-laning project. However, the Element does not reference project boundaries associated with this specific improvement. The ETDM Project Description does not identify a funding source for this project. None of the project alternatives are identified on Map 4-3 of the Santa Rosa County 2020 Future Transportation Map and none are identified on Map A of the City of Milton Future Transportation Map. The State Road 87 Connector project (including its alternatives) is not consistent with the comprehensive plans of Santa Rosa County or the City of Milton for the following reasons: (1) It is not specifically identified in the Santa Rosa County or the City of Milton Comprehensive Plans. (2) It is not identified on the Future Transportation Maps of Santa Rosa County or the City of Milton. (3) It is not specifically identified in the Five-Year Capital Improvement Schedule of Santa Rosa County and the City of Milton. (4) It is inconsistent with Policy 8.1.D.6 of the Conservation Element of the Santa Rosa County Comprehensive Plan, which states that new public infrastructure should not be planned where development may be promoted in environmentally sensitive lands. (5) It is inconsistent with Objective 3.3A of the Future Land Use Element of the Santa Rosa County Comprehensive Plan, which requires that future development within adopted Military Airport Zones (MAZs) not negatively impact current and long term viable use of airfields by limiting incompatible land uses. The project should be modified to be consistent with the policies identified above and the local government comprehensive plans should be revised to include this project before it advances into the FDOT Five Year Work program. Staff review of the project addressed the following concerns: Land use -- Alternatives 1, 2, and 3 of the State Road 87 Connector project are located to the northeast of the City of Milton and connect through land designated as "Agriculture (AG)" on Map 3-1 of the Santa Rosa County Future Land Use Map. Construction of a roadway along these corridors has the potential to promote urban sprawl, based on the definitions in Rules 9J-5.003(134) and 9J-5.006(5), F.A.C. (134) "Urban sprawl" means urban development or uses which are located in predominantly rural areas, or rural areas interspersed with generally low-intensity or low-density urban uses, and which are characterized by one or more of the following conditions: (a) The premature or poorly planned conversion of rural land to other uses; (b) The creation of areas of urban development or uses which are not functionally related to land uses which predominate the adjacent area; or (c) The creation of areas of urban development or uses which fail to maximize the use of existing public facilities or the use of areas within which public services are currently provided. Urban sprawl is typically manifested in one or more of the following land use or development patterns: Leapfrog or scattered development; ribbon or strip commercial or other development; or large expanses of predominantly low-intensity, low-density, or single-use development. The information provided in the ETDM Project Description is insufficient to determine the impacts of the project on urban sprawl or greenhouse gas emissions. The project has been discussed with Santa Rosa County planning staff who indicated that the selected alignment alternative is intended to be constructed as a limited access roadway. If so, contribution to urban sprawl and greenhouse gas emissions may be mitigated, depending on usage and access characteristics. Objective 3.1.A of the Santa Rosa County Comprehensive Plan Future Land Use Element requires future land uses to be coordinated in order to ensure the protection of natural resources and with the availability of adequate infrastructure, the reduction of greenhouse gas emissions. Alternatives 1, 2, and 3 connect through agricultural, single family residential, industrial and conservation/recreation land uses. While Alternatives 4, 5 and 6 maximize the use of existing roadway infrastructure as identified in the ETDM Project Description, Alternatives 1, 2 and 3 as described may not protect natural resources and reduce greenhouse gas emissions. The portions of alternatives traversing through the City of Milton connect through commercial uses as identified on the City Future Land Use Map. The City of Milton Comprehensive Plan does not contain policies within its plan that address the reduction of greenhouse gas emissions. Transportation -- The ETDM Purpose and Need Statement identifies State Road 87 as a vital evacuation route for Gulf Breeze and Navarre residents to travel northbound. State Road 87 is also identified as a hurricane evacuation route on Map 4-2 Santa Rosa Future Transportation Map 2025. However, the current route connects using a congested portion of US 90 through the City of Milton downtown section. The project is identified in the MPO 2020 Cost Feasible Plan as a Project Development and Environment Study (PD&E) consisting of preliminary design phases. The roadway corridor selected will be a two-lane facility with right-of-way acquired for a four lane facility. No funding sources have currently been identified for the project. Further, the anticipated residential and business growth of Santa Rosa County emphasizes the need for an improved roadway network which will better facilitate traffic along the existing corridor. Conservation - Policy 8.1.D.6 of the Santa Rosa County Comprehensive Plan Conservation Element requires that new public infrastructure be compatible with future and existing land uses and should not promote increased development located in environmentally sensitive lands. The proposed roadway alternatives located to the north and east of the City of Milton (Alternatives 1, 2 and 3) are located in agriculturally designated areas on the Santa Rosa County Future Land Use Map. Portions of the roadway alternatives are also located close to the Clear Creek/Whiting Field Florida Forever Project Boundary. Construction of a new roadway through and around areas designated for conservation has the potential to jeopardize environmental resources located in and around the Florida Forever project Boundary and surrounding agricultural areas. The project is therefore inconsistent with Santa Rosa Comprehensive Plan Policy 8.1.D.6. Military Facility-Objective 3.3.A of the Santa Rosa County Comprehensive Plan Future Land Use Element requires that future development within adopted Military Airport Zones (MAZs) and Public Airport Zones (PAZs) not negatively impact current and long term viable use of the airfield by limiting incompatible land uses. Portions of the proposed location of roadway Alternatives 1, 2 and 3 are located within, or near the Airport Zones

identified on Map 3-18 of the Future Land Use Map Series (NAS Whiting Field Military Airport Zone (MAZ) Map) contained within the Santa Rosa County Comprehensive Plan. The map identifies Accident Potential Zones within the MAZ boundaries. Accident Potential Zones refer to areas with a greater potential for accidents to occur around airport facilities. Alternatives 2 and 3 of this project are inconsistent with Objective 3.3.A of the Santa Rosa County Comprehensive Plan and Map 3-18 of the Santa Rosa County Future Land Use Map Series (NAS Whiting Field Military Facility) because of safety concerns involving the potentially adverse impacts of new roadway construction and vehicle traffic passing through Airport Zone boundaries around the existing military facility. Alternative 1 is located near the Airport Zone, but is located outside of the Airport Zone boundary.

- Submitted By: FL Department of Community Affairs
- Comment Date: 2010-03-02 10:34:03.0
- Consistent with MPO Goals and Objectives.

Lead Agency

Federal Highway Administration

Exempted Agencies

Agency Name	Justification	Date
Federal Transit Administration	FTA has requested to be exempt from reviewing any non-transit projects.	04/13/2011

Community Desired Features

No desired features have been entered into the database. This does not necessarily imply that none have been identified.

Purpose and Need

Purpose and Need Statement

The purpose of the SR 87 Connector Project Development and Environment (PD&E) Study is to develop a proposed improvement strategy that is technically sound, environmentally sensitive and publicly acceptable. This project is needed to provide for a new roadway facility linking SR 87S with SR 87N, as an alternative to the existing shared facility of SR 87 and US 90, which is a constrained facility that is currently operating at a failing level of service (LOS F). Therefore, the primary need for this new corridor is to provide additional capacity, and to improve regional connectivity by providing a more direct route from areas of high growth in northern Santa Rosa County, such as the Berryhill Road area, to I-10 and to areas further to the south. Likewise, access will be improved to and from I-10 for the Whiting Field U.S. Naval Air Station, and the County's Joint Use Planning Area near Whiting Field. It is also anticipated that this new facility would provide relief to Ward Basin Road and its intersection with US 90. It is also intended to provide much needed relief to the US 90 Blackwater Bridge.

Emergency Evacuation

SR 87 serves as a vital evacuation route for northbound traffic destined for I-65 in Alabama. During times of hurricane force winds, both the Escambia Bay Bridge and the Garcon Point Bridge close. This leaves SR 87, north to the interstate and beyond the only access point out for many beach area communities, such as Gulf Breeze and Navarre. It is the only access point into the area for Emergency First Responders. However, with a portion of the current alignment travelling along a congested portion of US 90, through historic downtown Milton, it cannot function as a contiguous roadway. The project will address future projected deficiencies on an established emergency hurricane evacuation route.

Multi-modalism

The project will also address the need for greater bicycle and sidewalk connectivity in the County with possible connections with the Blackwater Heritage Trail enabling area resident's direct access. Unfortunately, Escambia County Area Transit does not provide service to this area of Santa Rosa County. However, in the future if such services were to be provided, the proposed facility would offer greater opportunities in regional network systems for transit.

Roadway Characteristics

Depending on the corridor selected, the project could range between 6 and 12 miles in length. Based upon preliminary project review, the new facility will likely be a two-lane rural facility with an open drainage system; however, in areas where steep grades or poor soil conditions occur near wetlands, separate stormwater retention ponds may be required.

Social Demand and Economic Development

Santa Rosa County has been experiencing considerable growth over the past year, and has grown in its own right, but also as a bedroom community to the greater Pensacola area. This growth has spurred the need for an improved roadway network. In addition, there are several major traffic generators within the US 90 corridor area, such as new residential developments, the Santa Rosa Criminal Justice Center, the Santa Rosa Corrections Facility, Whiting Field U.S. Naval Air Station, Team Rosa Joint Planning area near Whiting Field, and the Santa Rosa Commerce Park, which would all benefit from the capacity this facility will provide. The need for the project is also related to committed trips associated with future development in the northern portions of Santa Rosa County, as well as, the future development along the US 90 corridor, which is hindered by the existing capacity limits of US 90.

Future Growth

Santa Rosa County has grown 173% since 1980 and is expected to grow another 92% by 2030. This increase will put further demand on the US 90/SR 87 segment, making growth and evacuation difficult due to a lack of capacity. In Traffic Analysis Zones adjacent to the corridor, population is anticipated to grow by 2,648 from 2,029 to 4,677, or 56.62 percent, between 1997 and 2020. Employment is projected to increase by 575 from 908 to 1,483, or 38.77 percent. The number of dwelling units is forecasted to rise by 1,114 from 827 to 1,941, or 57.39 percent.

Traffic Data

According to the Santa Rosa County Comprehensive Plan, the current adopted Level of Service (LOS) standard for US 90 is D. In 2008, US 90 from Ward Basin Road to SR 87N the road had a failing level of service. Without the proposed improvement, the operating conditions will continue to deteriorate. The Raw Model Volume for the 2020 Needs Plan for this new segment is 9,472. This would provide much needed relief to US 90.

Safety/Crash Rates

The information below contains crash data from the period of 2004 thru 2009 according to the Florida Department of Transportation TSAT data base.

On SR 87 south, from I-10 to US 90, between mile points 18.500 (I-10) and 19.769 (US 90), there were a total of 86 crashes, 47 of those were with

injuries, and 39 with property damage only. The majority of the crashes in this segment occurred at the US 90/SR 87S intersection.

On US 90, from 87 south to 87 north, between mile points 11.610 and 16.202, there were a total of 234 crashes, 144 of those were with injuries, 1 fatality, and 89 with property damage only. The majority of these crashes were distributed throughout the segment. There was, however, a slightly higher concentration of crashes at the US 90/SR 87N intersection. The single fatality in the segment occurred at mile point 13.847 just east of Ward Basin Road.

On SR 87N, from US 90 to Southridge Road, between mile points 11.610 and 16.202, there were a total of 166 crashes, 113 of those were with injuries, and 53 with property damage only. As with the segment along US 90, the majority of these crashes were distributed throughout the segment. There was, however, a slightly higher concentration of crashes at the US 90/SR 87N intersection.

The new proposed road way will connect SR 87S and SR 87N. Presently, the SR 87 corridor follows along US 90, a congested roadway, for five miles. This portion of the corridor is operating at a LOS F. Improvements to the existing roadway in this vicinity are difficult due to the historic downtown Milton area. By developing a new corridor that does not follow the existing US 90 alignment, the traveler would be able to avoid this high traffic area.

Plan Consistency

The proposed new facility is consistent with the Santa Rosa County Comprehensive Plan, and is also referenced in the County's Capital Improvements Schedule in Policy 4.1.E.3. The Comprehensive Plan design year for this facility is currently 2025. As the project moves through the next study phase and a formal forecast traffic report is completed, the design year will change to allow for a standard twenty year forecast year to comply with federal guidelines (Design Year 2035). Likewise, the proposed new facility is in the TIP and the STIP, as well as, in the Florida/Alabama TPO and listed in their five-year work program.

Purpose and Need Reviews

Agency	Acknowledgment	Review Date
FL Department of Community Affairs	Understood	03/02/2010
FL Department of Environmental Protection	Understood	01/29/2010
FL Fish and Wildlife Conservation Commission	Understood	01/19/2010
Federal Highway Administration	Accepted	04/01/2010

Comments: Since the intent seems to be to acquire enough right-of-way for an ultimate 4-lane project, the scope of the PD&E should assess the impacts of a 4-lane facility, with the understanding that it is likely to be a phased improvement.

DCA noted potential inconsistencies with comprehensive land use and environmental policies in their AN/ETDM review. Some of these concerns could potentially be addressed using access management standards for the project as a means of guiding secondary development to the most appropriate locations. This should be addressed during PD&E.

The project description states that the LRTP indicates the year 2025 as the design year for the project. Funding in the associated planning documents should therefore be consistent with this schedule. In other words, a portion of the construction funding would need to be indicated by the year 2025, with money for design and right-of-way programmed for earlier dates in the LRTP, TIP and STIP. FHWA would look for consistency with these documents, as well as the local comprehensive plans, before PD&E approval.

National Marine Fisheries Service	Understood	01/15/2010
Natural Resources Conservation Service	Understood	01/08/2010
Northwest Florida Water Management District	Understood	01/29/2010
US Army Corps of Engineers	Understood	12/23/2009
US Coast Guard	Understood	01/12/2010
US Environmental Protection Agency	Understood	01/14/2010
US Fish and Wildlife Service	Understood	01/22/2010

The following organizations were notified but did not submit a review of the Purpose and Need statement:

- FL Department of Agriculture and Consumer Services
- FL Department of State
- Federal Transit Administration
- Miccosukee Tribe of Indians of Florida
- National Park Service
- Seminole Tribe of Florida
- US Forest Service

Alternative #1 - # 1 Segments 1a, 1b, and 1c)

Alternative Description

From:	SR87S/US90	To:	SR 87N/SR 89S
Type:	New Alignment	Status:	ETAT Review Complete
Total Length:	6.5 mi.	Cost:	
Modes:	Roadway Bicycle Pedestrian	SIS:	N

Segment Description(s)

Location and Length							
Segment No.	Name	Beginning Location	Ending Location	Length (mi.)	Roadway Id	BMP	EMP
				2.35			
				8.15			
				0.47			
				1.69			
				1.69			
				0.47			
				0.87			
				2.35			
				3.16			
				5.18			
				5.18			
				2.35			
				0.36			
				2.45			
				5.18			

Jurisdiction and Class

Segment No.	Jurisdiction	Urban Service Area	Functional Class
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Base Conditions

Segment No.	Year	AADT	Lanes	Config
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Interim Plan

Segment No.	Year	AADT	Lanes	Config
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Needs Plan

Segment No.	Year	AADT	Lanes	Config
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Cost Feasible Plan

Segment No.	Year	AADT	Lanes	Config
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Funding Sources

No funding sources found.

Project Effects Overview

Issue	Degree of Effect	Organization	Date Reviewed
Natural			
Air Quality	2 Minimal	US Environmental Protection Agency	01/26/2010
Coastal and Marine	2 Minimal	National Marine Fisheries Service	01/15/2010
Contaminated Sites	2 Minimal	FL Department of Environmental Protection	01/29/2010
Contaminated Sites	2 Minimal	US Environmental Protection Agency	01/28/2010
Farmlands	2 Minimal	Natural Resources Conservation Service	01/08/2010
Floodplains	4 Substantial	Northwest Florida Water Management District	01/29/2010
Floodplains	3 Moderate	US Environmental Protection Agency	01/28/2010

Infrastructure	No reviews recorded.		
Navigation	2	Minimal	US Army Corps of Engineers 12/24/2009
Navigation	3	Moderate	US Coast Guard 12/18/2009
Special Designations	3	Moderate	US Environmental Protection Agency 01/29/2010
Water Quality and Quantity	4	Substantial	US Environmental Protection Agency 01/31/2010
Water Quality and Quantity	3	Moderate	FL Department of Environmental Protection 01/29/2010
Water Quality and Quantity	4	Substantial	Northwest Florida Water Management District 01/29/2010
Wetlands	4	Substantial	FL Department of Environmental Protection 01/29/2010
Wetlands	3	Moderate	US Environmental Protection Agency 01/29/2010
Wetlands	4	Substantial	Northwest Florida Water Management District 01/29/2010
Wetlands	4	Substantial	US Fish and Wildlife Service 01/22/2010
Wetlands	2	Minimal	National Marine Fisheries Service 01/15/2010
Wetlands	3	Moderate	US Army Corps of Engineers 12/24/2009
Wildlife and Habitat	2	Minimal	Naval Air Station Whiting Field 02/14/2010
Wildlife and Habitat	4	Substantial	US Fish and Wildlife Service 01/22/2010
Wildlife and Habitat	4	Substantial	FL Fish and Wildlife Conservation Commission 01/19/2010
Cultural			
Historic and Archaeological Sites	3	Moderate	Federal Highway Administration 04/08/2010
Historic and Archaeological Sites	3	Moderate	FL Department of State 01/25/2010
Historic and Archaeological Sites	2	Minimal	Miccosukee Tribe of Indians of Florida 01/19/2010
Recreation Areas	3	Moderate	FL Department of Environmental Protection 01/29/2010
Recreation Areas	3	Moderate	US Environmental Protection Agency 01/28/2010
Section 4(f) Potential	3	Moderate	Federal Highway Administration 04/08/2010
Section 4(f) Potential	N/A	N/A / No Involvement	National Park Service 01/15/2010
Community			
Aesthetics	No reviews recorded.		
Economic	No reviews recorded.		
Land Use	3	Moderate	FL Department of Community Affairs 03/02/2010
Land Use	2	Minimal	Naval Air Station Whiting Field 02/14/2010
Mobility	1	Enhanced	FL Department of Environmental Protection 01/29/2010
Relocation	No reviews recorded.		
Social	0	None	FL Department of Community Affairs 03/02/2010
Social	3	Moderate	US Environmental Protection Agency 02/01/2010
Secondary and Cumulative			
Secondary and Cumulative Effects	4	Substantial	Northwest Florida Water Management District 01/29/2010
Secondary and Cumulative Effects	4	Substantial	US Fish and Wildlife Service 01/22/2010

ETAT Reviews and Coordinator Summary: Natural Issues

Coordinator Summary: Air Quality Issue

2 Minimal assigned 05/12/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has evaluated comments from the US Environmental Protection Agency (USEPA) and recommends a Degree of Effect of Minimal.

The project is located in an area which is designated 'attainment' for all of the National Ambient Air Quality Standards under the criteria provided in the Clean Air Act.

An air quality analysis will be performed as part of the Project Development and Environment (PD&E) Study as outlined in the scope for this project.

The Federal Highway Administration (FHWA) did not provide comment.

ETAT Reviews: Air Quality Issue: 1 found

2 *Minimal* assigned 01/26/2010 by Madolyn Dominy, US Environmental Protection Agency

Coordination Document: No Selection

Dispute Information:N/A

Identified Resources and Level of Importance: Resources: Air Quality

Level of Importance: Low, due to minimal degree of effect. A minimal degree of effect is being assigned to the air quality issue for the proposed roadway project (ETDM #12597, SR 87 Connector, Alternatives 1 - 6).

Comments on Effects to Resources: Santa Rosa County (which includes the SR Connector Corridor) has not been designated non-attainment or maintenance for ozone, carbon monoxide (CO) or particulate matter (PM) in accordance with the Clean Air Act. There are no violations of National Ambient Air Quality Standards (NAAQS). Nevertheless, it is recommended that the environmental review phase of this project include air impact analyses which documents the current pollutant concentrations recorded at the nearest air quality monitors, an evaluation of anticipated emissions, and air quality trend analyses. It is also recommended that environmental reviews of the project include hot spot analyses at the points in time and places where congestion are expected to be greatest or in areas of sensitive receptors. Air quality modeling using an approved software program should be conducted to determine whether any conformity issues or violations of air quality standards are anticipated within the project area and/or counties. Current and proposed air quality requirements and standards should be used in modeling software programs.

Additional Comments (optional): As population growth and vehicle volumes increase, there is the potential to have air quality conformity and non-attainment issues in the future. FDOT, MPOs, municipalities, and regional planning agencies should conduct air quality modeling as traffic forecasts increase.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Air Quality issue for this alternative: Federal Highway Administration

Coordinator Summary: Coastal and Marine Issue

2 *Minimal* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has evaluated comments from the National Marine Fisheries Service (NMFS) and recommends a Degree of Effect of Minimal.

There are several important resources in the area; Pensacola Bay, East Bay, Blackwater Bay and the lower reaches of the Blackwater River, that contain habitats used by federally-managed fish species and their prey.

On January 12, 2010, NMFS staff conducted a site inspection of these areas. From this inspection, it was found that Alternative 1 does not appear to directly impact NMFS trust resources. However, due to possible indirect impacts, the FDOT acknowledges the NMFS recommendation that stormwater treatment systems be designed to prevent degraded water from reaching estuarine habitats. In addition, drainage and hydrologic functions will be considered during the design of the project and Best Management Practices (BMPs) will be utilized during construction to prevent siltation of downstream estuarine habitats.

The Federal Highway Administration (FHWA) did not provide comments.

ETAT Reviews: Coastal and Marine Issue: 1 found

2 *Minimal* assigned 01/15/2010 by David A. Rydene, National Marine Fisheries Service

Coordination Document: No Selection

Dispute Information:N/A

Identified Resources and Level of Importance: Pensacola Bay, East Bay, Blackwater Bay and the lower reaches of the Blackwater River. These systems contain estuarine and marine habitats used by federally-managed fish species and their prey.

Comments on Effects to Resources: Alternative 1 - NMFS staff conducted a site inspection of the project area on January 12, 2010, to assess potential concerns to living marine resources within Pensacola Bay, East Bay, Blackwater Bay, and the lower reaches of the Blackwater River. The lands adjacent to the proposed alignment appear to be mostly forested palustrine wetlands. It does not appear that Alternative 1 will directly impact NMFS trust resources. However, the road would cross both the Blackwater River (just northeast of Cooper Basin) and Clear Creek, both of which drain to Blackwater Bay, East Bay, and Pensacola Bay. Therefore, the project may result in indirect impacts to downstream NMFS trust resources. Use of the road could result in an increase in the amount of sediment, oil and grease, metals, and other pollutants reaching estuarine habitats utilized by marine fishery resources. Therefore, NMFS recommends that stormwater treatment systems be designed to prevent degraded water from reaching estuarine and marine habitats. Best management practices should be employed during road construction to prevent siltation of downstream estuarine habitats. Additionally, the manner in which the road may affect drainage within the watershed and hydrologic functions should be considered.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Coastal and Marine issue for this alternative: Federal Highway Administration

Coordinator Summary: Contaminated Sites Issue

2 *Minimal* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has reviewed the comments from the Florida Department of Environmental Protection (FDEP) and the US Environmental Protection Agency (USEPA) and recommends a Degree of Effect of Minimal.

Both agencies found that GIS data indicated there is one Brownfield area, the Santa Rosa Brownfield Redevelopment Area, and a solid waste facility, G&D Tires, Inc., within the 500-ft. project buffer zone. Due to the fact that there are few contaminated sites identified within Alternative 1, impacts are expected to be minimal. However, the FDOT acknowledges the FDEP comment that projects involving 'dewatering' should be discouraged and that dewatering projects would require permits / approval from the Northwest Florida Water Management District.

In addition, FDOT understands the importance of referencing "Section 120 Excavation and Embankment -- Subarticle 120-1.2 Unidentified Areas of Contamination of the Standard Specifications for Road and Bridge Construction" in the project's construction contract documents that would require specific actions by the contractor in the event of any hazardous material or suspected contamination issue arises. FDOT understands that potentially hazardous materials must be properly managed in accordance with Chapter 62-730, F.A.C. In addition, any solid wastes or other non-hazardous debris must be managed in accordance with Chapter 62-701, F.A.C. Petroleum cleanups must be managed in accordance with Chapter 62-770, F.A.C.

As suggested by the FDEP, a Contamination Screening Evaluation will be performed. Also, we have noted the FDEP comment on the new rule, 62-780, F.A.C., which became effective on April 17, 2005, as well as, Chapters 62-770, 62-777, 62-782 and 62-785, F.A.C., that were amended on April 17, 2005, to incorporate recent statutory changes. We understand that depending on the findings of the environmental assessments, there may be "off-property" notification responsibilities potentially associated with this project.

Finally, the FDOT understands the USEPA comment that remediation may be required if contaminated site features are impacted and area sampling determines pollutants are present above regulatory levels.

No Comments were received from the Federal Highway Administration (FHWA)

ETAT Reviews: Contaminated Sites Issue: 2 found

2 Minimal assigned 01/29/2010 by Lauren P. Milligan, FL Department of Environmental Protection

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: GIS data indicates that there is one brownfield area, the Santa Rosa Brownfield Redevelopment Area, and a solid waste facility, G&D Tires, Inc., within the 500-ft. project buffer zone.

Comments on Effects to Resources: Contamination Screening Evaluations should outline specific procedures that would be followed by the applicant in the event that drums, wastes, tanks or potentially contaminated soils are encountered during construction.

In the event contamination is detected during construction, the Department and Santa Rosa County should be notified, and the FDOT may need to address the problem through additional assessment and remediation activities. Reference should be made to the most recent FDOT specification entitled "Section 120 Excavation and Embankment -- Subarticle 120-1.2 Unidentified Areas of Contamination of the Standard Specifications for Road and Bridge Construction" in the project's construction contract documents that would require specific actions by the contractor in the event of any hazardous material or suspected contamination issue arises.

Depending on the findings of the Contamination Screening Evaluations and the proximity to known contaminated sites, projects involving "dewatering" should be discouraged or limited, since there is a potential to spread contamination to previously uncontaminated areas or less contaminated areas and affect contamination receptors, site workers and the public. Dewatering projects would require permits / approval from the Northwest Florida Water Management District.

Any land clearing or construction debris must be characterized for proper disposal. Potentially hazardous materials must be properly managed in accordance with Chapter 62-730, F.A.C. In addition, any solid wastes or other non-hazardous debris must be managed in accordance with Chapter 62-701, F.A.C. Petroleum cleanups must be managed in accordance with Chapter 62-770, F.A.C.

Please be advised that a new rule, 62-780, F.A.C., became effective on April 17, 2005. In addition, Chapters 62-770, 62-777, 62-782 and 62-785, F.A.C., were amended on April 17, 2005, to incorporate recent statutory changes. Depending on the findings of the environmental assessments, there are "off-property" notification responsibilities potentially associated with this project. These rules may be found at the following website: <http://www.dep.state.fl.us/waste/>

Based on our experience, the accurate identification, characterization and cleanup of sites requires experienced consulting personnel and laboratory support, management commitment of the project developers and their representatives, and will likely be very time-consuming. Early planning to address these issues is essential to meet construction and cleanup (if required) timeframes. Innovative technologies, such as special storm water management systems, engineering controls and institutional controls, such as conditions on water production wells and dewatering restrictions, may be required, depending on the results of environmental assessments.

Coordinator Feedback: None

2 Minimal assigned 01/28/2010 by Madolyn Dominy, US Environmental Protection Agency

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: Resources: Soils, groundwater, surface water which have the potential to be negatively affected by contaminated site features such as underground petroleum storage tanks, industrial/commercial facilities with onsite storage of hazardous materials, solid waste facilities, hazardous waste facilities, National Priority List (NPL) sites, etc.

Level of Importance: These resources are of a high level of importance in the State of Florida. However, a minimal degree of effect is being assigned for the proposed project Alternative 1 (ETDM #12597, SR 87 Connector).

Comments on Effects to Resources: EPA reviewed the following contaminated sites GIS analysis data for buffer distances of 100, 200, and 500 feet: Brownfield Location Boundaries, Geocoded Dry Cleaners, Geocoded Gasoline Stations, Geocoded Petroleum Tanks, Hazardous Waste Sites, National Priority List Sites, Nuclear Site Locations, Solid Waste Facilities, Superfund Hazardous Waste Sites, TANKS-NOV 2007, Toxic Release Inventory Sites, and USEPA RCRA Facilities.

Overall, for Alternative 1, there are very few contaminated sites features within proximity of the proposed alignment. The following features are listed in

the GIS analysis data at the programming screen phase of the project:

Brownfield Location Boundaries:

The Santa Rosa Brownfield Redevelopment Area is listed as being within proximity of the proposed roadway project. Brownfield projects are defined as abandoned, idled or under-utilized property where expansion or redevelopment is complicated by the presence or potential presence of environmental contamination. Previous thriving areas of economic activity are listed as Brownfield if the area is abandoned by contamination from past uses. Areas being unused or under-utilized are impediments to economic development in rural and urban communities. Redeveloped, these Brownfield areas can be catalysts for community revitalization. The Brownfield program brings together federal agencies to address cleanup and redevelopment in a more coordinated approach. Often times, federal grant programs and public/private organizations assist in the cleanup and redevelopment of Brownfield areas. The environmental review phase of the project should evaluate whether the classification of this area as a Brownfield Site will impact the roadway project.

Solid Waste Facilities:

G&D Tires, Inc (500-foot buffer distance)

No other contaminated sites features listed above were identified in the online EST GIS analysis data search.

Due to the fact that there are minimal to no contaminated sites features identified to be within the buffer boundaries, impacts to and/or from contaminated site features are expected to be minimal.

The environmental review (PD&E) phase of the project should include a survey of the area to confirm the location of current listed contaminated site features, along with other contaminated site features which may have been previously located in the area. If any contaminated sites features (e.g., petroleum storage tanks) are to be impacted or removed during the construction phase of the project, sampling and analysis should be conducted to determine if pollutants are present above regulatory levels. If high levels of pollutants are identified, remediation may be required prior to commencement of construction of the project.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Contaminated Sites issue for this alternative: Federal Highway Administration

Coordinator Summary: Farmlands Issue

2 *Minimal* assigned 03/30/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has reviewed the comments from the Natural Resources Conservation Service (NRCS) and recommends a Degree of Effect of Minimal.

The NRCS found that Alternative 1 impacts less than 1 acre of Prime Farmland at the 200 ft buffer width and nearly 8 acres at the 500 ft buffer width. Because the impact to Ag and Prime Farmland was determined to be minimal, the NRCS assigned a minimal impact rating for this Alternative.

No Comments were received from the Federal Highway Administration (FHWA)

ETAT Reviews: Farmlands Issue: 1 found

2 *Minimal* assigned 01/08/2010 by Rick Allen Robbins, Natural Resources Conservation Service

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: The USDA-NRCS considers soil map units with important soil properties for agricultural uses to be Prime Farmland. In addition, the USDA-NRCS considers any soils used in the production of commodity crops (such as, cotton, citrus, row crops, specialty crops, nuts, etc.) to possibly be considered as Unique Farmlands. Nationally, there has been a reduction in the overall amount of Prime and Unique Farmlands through conversion to non-farm uses. This trend has the possibility of impacting the nation's food supply and exporting capabilities.

Comments on Effects to Resources: Conducting GIS analysis of Prime Farmland (using USDA-NRCS data) and Important (Unique) Farmland Analysis (using 2004 NFWFMD data) has resulted in the determination that there are Prime Farmland soils at all buffer widths within the Project Area. Alternative #1 impacts less than 1 acre of Prime Farmland up to the 200 foot buffer width, and nearly 8 acres at the 500 foot buffer width. Impacts to Ag lands are primarily restricted to improved and unimproved pasture. Since the impact to Ag and Prime Farmland is minimal, we are assigning a minimal impact rating for this Alternative. Negative effects to important agricultural lands (pecan groves) occur only at the 5280 foot buffer.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Farmlands issue for this alternative: Federal Highway Administration

Coordinator Summary: Floodplains Issue

4 *Substantial* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has reviewed the comments from the Northwest Florida Water Management District (NFWFMD) and the US Environmental Protection Agency (USEPA) and recommends a Degree of Effect of Substantial.

The NFWFMD's review found that approximately 176 acres of special flood hazard area are within the 500 foot buffer for this alignment. The flood prone areas are associated with Blackwater River and Clear Creek. In addition, approximately 109 acres are designated as storm surge zones under a Category 5 storm and Elevation ranges from approximately 0 to 174 feet NAVD 88.

The USEPA review of GIS analysis data (DFIRM 100-Year Floodplain and Special Flood Hazard Areas) indicates that all of the Alternatives (1 through 6) have approximately 20% of their acreage within the 100-year floodplain, as designated primarily by Zone AE of the flood hazard zone designation.

The FDOT acknowledges the comments from both agencies concerning the placement of a new roadway and how it will impact flow and possibly alter

flood storage capacity. During the conceptual drainage analysis in the PD&E process, engineering design features and hydrological drainage structures will be proposed that will address stormwater transport, flow, and ensure discharge meets or exceeds flood control requirements. This analysis will ensure that the project will comply with the appropriate minimum FEMA floodplain management requirements for any changes in the floodplain elevations. This will include coordination on any appropriate studies and map revisions required by Title 44, Code of Federal Regulations. FDOT understands the need for consultation, and coordination with appropriate flood management agencies will occur relating to regulatory requirements, avoidance, minimization and/or mitigation strategies.

No Comments were received from the Federal Highway Administration (FHWA) or the FL Department of Environmental Protection (FDEP).

ETAT Reviews: Floodplains Issue: 2 found

4 *Substantial* assigned 01/29/2010 by Leigh Brooks, Northwest Florida Water Management District

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information: N/A

Identified Resources and Level of Importance: Approximately 176 acres of special flood hazard area are identified within the 500 foot buffer for this alignment. Flood prone areas are associated with Blackwater River and Clear Creek. Approximately 109 acres are designated as storm surge zones under a Category 5 storm. Elevation ranges from approximately 0 to 174 feet NAVD 88.

Comments on Effects to Resources: Floodplain function could be diminished with a new road, as water storage and flood attenuation potential will be impacted. Placement of roadway fill has the potential to impound waters and otherwise redirect flow, affecting floodplain, wetland, and riverine resources. Likewise, the use of culverts has the potential for altering stream channels and flow. Efforts should be made within the project area to protect floodplain resources and capacity and to prevent offsite flooding.

Proposed activities have the potential to diminish water quality, environmental resiliency, wetland and transitional habitat, and associated economic and environmental benefits provided by a fully functioning, intact floodplain.

Additional Comments (optional): Efforts should be made to protect floodplain resources and functions. Assurances should be provided that the project has complied with the appropriate minimum FEMA floodplain management requirements for any changes in the floodplain elevations. This includes appropriate studies and map revisions required by Title 44, Code of Federal Regulations.

Hydrologic connectivity and integrity should be maintained. Where impact avoidance is impossible and wetlands and streams must be crossed, extended elevated bridges should be employed to protect the integrity of stream corridors, hydrology, and floodplain functions.

Coordinator Feedback: None

3 *Moderate* assigned 01/28/2010 by Madolyn Dominy, US Environmental Protection Agency

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: Resources: Floodplains

Level of Importance: Development within the 100-year floodplain is of a high level of importance. Construction of roadways within the floodplain should not impede, obstruct or divert the flow of water or debris in the floodplain which would alter the roadway's discharge capacity or otherwise adversely affect public health, safety and welfare, or cause damage to public or private property in the event of a flood. A moderate degree of effect is being assigned for the proposed project (ETDM #12597, SR 87 Connector).

Comments on Effects to Resources: A review of GIS analysis data (DFIRM 100-Year Floodplain and Special Flood Hazard Areas) in the EST at the programming screen phase of the project indicates that all of the Alternatives (1 through 6) have approximately 20% of the acreage within the 100-year floodplain, as designated primarily by Zone AE of the flood hazard zone designation.

General comments relating to floodplains include the fact that any development within the 100-year floodplain has the potential for placing citizens and property at risk of flooding and producing changes in floodplain elevations and plan view extent. Development (such as roadways, housing developments, strip malls and other commercial facilities) within floodplains increases the potential for flooding by limiting flood storage capacity and exposing people and property to flood hazards. Development also reduces vegetated buffers that protect water quality and destroys important habitats for fish and wildlife. The area surrounding the proposed roadway project is expected to experience growth, and the SR 87 Connector would likely result in development which would have indirect and cumulative effects on floodplains in the SR 87 Connector corridor.

The PD&E phase of the project should include an evaluation of floodplain impacts. FDOT should consider alternatives to avoid adverse effects and incompatible development in the floodplains. Efforts should be made to avoid or minimize impacts to floodplain resources and functions. Engineering design features and hydrological drainage structures should be such that stormwater transport, flow, and discharge meet or exceed flood control requirements. Consultation and coordination with appropriate flood management agencies should occur relating to regulatory requirements, avoidance, minimization and/or mitigation strategies.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Floodplains issue for this alternative: FL Department of Environmental Protection, Federal Highway Administration

Coordinator Summary: Infrastructure Issue

1 *Enhanced* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) recommends a Degree of Effect of Enhanced for Infrastructure.

This Alternative provides for a much needed facility to more effectively distribute traffic throughout the area. One of the enhancements to the area infrastructure includes providing a new bridge crossing across the Blackwater River. It also provides a more direct connection between I-10 and the Naval Air Station, Whiting Field. Alternative 1 also positively contributes to bicycle and pedestrian modes of travel by linking areas currently isolated.

No comments were received from the Federal Highway Administration (FHWA).

ETAT Reviews: Infrastructure Issue: None found

The following organization(s) were expected to but did not submit a review of the Infrastructure issue for this alternative: Federal Highway Administration

Coordinator Summary: Navigation Issue

3 *Moderate* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has reviewed the comments from the US Army Corps of Engineers (USACOE) and the US Coast Guard (USCG) and recommends a Degree of Effect of Moderate.

The FDOT acknowledges the USACOE comment that the Blackwater River appears to be navigable and the bridge design should take into account the type of boat traffic traditionally on this waterway.

In addition, FDOT also notes the USCG comment that crossing this waterway at the Alternative 1 location will put the crossing in a possibly tidally influenced area as well as a recreational and other navigational use area. In addition, the crossing will need to be evaluated by the USCG to determine possible bridge permitting requirements.

No Comments were received from the Federal Highway Administration (FHWA).

ETAT Reviews: Navigation Issue: 2 found

2 *Minimal* assigned 12/24/2009 by Randy Turner, US Army Corps of Engineers

Coordination Document: No Selection

Dispute Information:N/A

Identified Resources and Level of Importance: Blackwater River appears to be navigable water for recreational users. The river is one of the four river systems that drains the Pensacola Bay watershed and drains into the Blackwater Bay estuary. Impacts to navigation should be minimal.

Comments on Effects to Resources: The bridge design should take into account the type of boat traffic that traditionally uses the waterway. A taller and longer span design would also reduce impacts to the abutting wetland system.

Coordinator Feedback: None

3 *Moderate* assigned 12/18/2009 by Philip R Johnson, US Coast Guard

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information:N/A

Identified Resources and Level of Importance: This proposed corridor crosses the Blackwater River north east of Milton, Florida. The Blackwater River may be tidally influenced at the proposed crossing and considered to be a navigable waterway of the United States and subject to Coast Guard jurisdiction for purposes of bridge permitting actions.

Comments on Effects to Resources: While the Blackwater River may not support commercial navigation at the proposed crossing site, the waterway at that location will need to be evaluated in terms of recreational or other navigational use for possible bridge permitting requirements.

Additional Comments (optional): Any other crossing of waterways associated with this corridor will also need to be independently evaluated for determining Coast Guard bridge permitting requirements.

CLC Commitments and Recommendations: Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Navigation issue for this alternative: Federal Highway Administration

Coordinator Summary: Special Designations Issue

3 *Moderate* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has reviewed the comments from the US Environmental Protection Agency (USEPA) and recommends a Degree of Effect of Moderate.

USEPA's review of GIS data included finding the following Special Designation Sites within the proximity of Alternative 1: Brownfield Location Boundaries, Special Flood Hazard Areas, Public Lands, Prime Farm Land, and Outstanding Florida Waters.

The USEPA assigned a Moderate degree of effect because of the inclusion of an Outstanding Florida Water in this list. The Blackwater River is listed as an Outstanding Florida Water (OFW) and as such, is provided the highest level of protection under the Florida Administrative Code (F.A.C.).

Degradation of water quality in an OFW is prohibited except under certain circumstances. Pollutant discharges must not lower existing ambient water quality. Any activity within an OFW requiring a Florida Department of Environmental Protection (FDEP) Environmental Resource Permit (ERP) must be deemed to be clearly in the public interest. FDOT will coordinate and consult with FDEP about the specific permitting requirements relating to this OFW.

No Comments were received from the Federal Highway Administration (FHWA) or the FL Department of Agriculture and Consumer Services.

ETAT Reviews: Special Designations Issue: 1 found

3 *Moderate* assigned 01/29/2010 by Madolyn Dominy, US Environmental Protection Agency

Coordination Document: No Selection

Dispute Information:N/A

Identified Resources and Level of Importance: Resources: Brownfield Location Boundaries, Special Flood Hazard Areas, Public Lands (such as conservation easements, preserves, and conservation areas), Outstanding Florida Waters, Prime Farm Lands.

Level of Importance: These special designation features are of a high level of importance in the State of Florida. A moderate degree of effect is being assigned to this issue due to the fact that are special designation features, including an Outstanding Florida Water, within proximity of the proposed

project.

Comments on Effects to Resources: A review of GIS analysis data at the programming screen phase of the project indicates that the following features identified as Special Designations are located within proximity of Alternative 1:

Brownfield Location Boundaries - See Comments under Contaminated Sites issue regarding Brownfield Redevelopment Areas.

Special Flood Hazard Areas - See Comments under Floodplains issue regarding potential floodplain impacts.

Public Lands - See Comments under Recreation Areas issue regarding potential impacts to public lands and sensitive recreational/natural resource areas.

Prime Farm Land - There are three tracts of land within the 500-foot buffer distances (Kalmia, Johns, Dothan) that are designated Prime Farm Land. Prime farm land is a designation assigned by the US Department of Agriculture for land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops and is also available for these uses. It has the soil quality, growing season, and moisture supply needed to produce economically sustained high yields of crops when treated and managed according to acceptable farming methods. Prime farmland in the U.S. has been prone to conversion when in proximity to urban growth areas. Having property designated as USDA prime farm land can help with growth management and resource conservation efforts. Zoning and conservation easements help to preserve prime farm land resources. FDOT should consult with appropriate regulatory agencies (e.g., NRCS) regarding potential impacts to prime farm land.

Outstanding Florida Waters - A review of GIS analysis data at the programming screen phase of the project indicates that the Blackwater River is within 100 feet of the proposed project. The Blackwater River is listed as an Outstanding Florida Water (OFW). OFWs are provided the highest level of protection under the Florida Administrative Code (F.A.C.). Degradation of water quality in an OFW is prohibited except under certain circumstances. Pollutant discharges must not lower existing ambient water quality. Any activity within an OFW requiring a Florida Department of Environmental Protection (FDEP) Environmental Resource Permit (ERP) must be deemed to be clearly in the public interest. FDOT should coordinate and consult with FDEP requiring specific permitting requirements relating to this OFW. Increased and/or future development in the corridor surrounding the project may also have indirect and cumulative impacts on the Blackwater River and its tributaries.

EPA is assigning a moderate degree of effect to this issue due to the fact that there are sensitive environmental and natural resource areas located directly adjacent to the project. Also, the possibility of increased future development in the area would have indirect and cumulative impacts on these types of resources.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Special Designations issue for this alternative: FL Department of Agriculture and Consumer Services, Federal Highway Administration

Coordinator Summary: Water Quality and Quantity Issue

4 Substantial assigned 05/12/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has reviewed the comments from the US Environmental Protection Agency (USEPA), the Florida Department of Environmental Protection (FDEP) and Northwest Florida Water Management District (NFWFMD) and recommends a Degree of Effect of Substantial.

FDOT acknowledges that protecting water resources such as surface water quality is a priority of federal and state environmental agencies. All agencies commented that every effort should be made to maximize the treatment of stormwater runoff, because area stormwater discharges to the Blackwater River and eventually to the Yellow River Marsh Aquatic Preserve, both designated Outstanding Florida Waters (OFW) under section 62-302.700(9), F.A.C., and afforded a high level of protection under sections 62-4.242(2) and 62-302.700, F.A.C. Pursuant to section 373.414(1), F.S., direct impacts to these waterbodies and associated wetlands must be demonstrated to be "clearly in the public interest" as part of the Environmental Resource Permitting (ERP) process. In addition, the permit applicant may be required to demonstrate that the proposed stormwater system meets the design and performance criteria established for the treatment and attenuation of discharges to OFWs, pursuant to Chapter 62-346, F.A.C., and the DEP and NFWFMD ERP Applicant's Handbook.

FDOT is also taking note of the USEPA and NFWFMD comments that the various Alternatives are located within proximity to water bodies that are impaired for various pollutants (coliforms and mercury). The PD&E study will include a review of water quality standards in water bodies listed on the Clean Water Act 303(d) list of impaired waters. The western end of the segment lies in a subwatershed of the Blackwater River which is verified impaired for coliforms and mercury. The GIS analysis indicates 6 wells within a 500 foot buffered polygon. The western end of the polygon lies in an area "vulnerable" to contamination of the Floridan Aquifer and the majority of the polygon shows as "more vulnerable" to contamination of the surficial aquifer, according to the Florida Aquifer Vulnerability Assessment. In addition, approximately 18 acres of the buffered polygon have a slope greater than 10 percent, mainly on the southern bank of the Blackwater River floodplain. This ranks as one of the lower amounts of the six alternatives. Steep slopes are susceptible to erosion initiated by ground disturbance.

NFWFMD also added a comment that the Blackwater River and its receiving water, Blackwater Bay, are components of the larger Pensacola Bay Watershed and are Surface Water Improvement and Management (SWIM) priority waters of the NFWFMD. It should be noted that the river and floodplain corridor are priority for acquisitions for NFWFMD. The river is federally designated critical habitat for the Gulf sturgeon (*Acipenser oxyrinchus desotoi*). Also, NFWFMD expressed concern about impacts to Clear Creek or any disturbance of the escarpment west of the creek because it could subject this water body to water quality problems. FDOT understands the request to review this alternative's alignment because in the area of the Clear Creek escarpment, it veers away from the powerline.

Considering the data provided as well as internal data and analysis, all of the proposed alternatives would have substantial impacts to water resources. According to the NFWFMD, the apparent least adverse impact would occur under Alternative 1, followed by Alternative 2. Alternatives 3, 4, 5 and 6 have greater wetland impacts, infringe on protected conservation lands, and have greater potential secondary and cumulative impacts. Alternative 3 has the greatest impact to floodplains, and Alternatives 4, 5 and 6 are more vulnerable to storm surges. Alternative 2 presents a concern due to alignment along a steeply sloped, erosion-prone valley wall and proximity to a stream.

FDOT will use appropriate storm water treatment systems, best management practices (BMPs), and land planning to prevent non point source pollution

as suggested by the NFWWMD.

No Comments were received from the Federal Highway Administration (FHWA).

ETAT Reviews: Water Quality and Quantity Issue: 3 found

4 *Substantial* assigned 01/31/2010 by Madolyn Dominy, US Environmental Protection Agency

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: Resources: Water quality, surface water, groundwater

Level of Importance: These resources are of a high level of importance in the State of Florida. A substantial degree of effect is being assigned to this issue.

Comments on Effects to Resources: Protecting water resources such as surface water quality is a priority of federal and state environmental agencies. Primary sources of surface water quality impairment include point and non-point sources. A primary concern regarding water quality for the proposed project is the impact to surface water quality as a result of stormwater runoff into nearby surface water bodies. Stormwater runoff from the roadway would directly affect Blackwater River and other surface water bodies (such as Clear Creek). Blackwater River drains to Blackwater Bay and is part of the Pensacola Bay watershed.

Stormwater runoff from urban sources, including roadways, carries pollutants such as volatile organics, petroleum hydrocarbons, heavy metals, and pesticides/herbicides. Proper stormwater conveyance, containment, and treatment will be required in accordance with state and federal regulations and guidelines. A comprehensive evaluation of stormwater management issues in the project drainage basins (watershed) should be conducted. The construction of the SR 87 Connector could lead to increased growth, development, and population in this section of Santa Rosa County. Increased development leads to the increase of impervious surfaces (leading to stormwater runoff). Stormwater management issues become more critical to the reduction of pollution into surface waters.

The Blackwater River is listed as an Outstanding Florida Water (OFW). OFWs are provided the highest level of protection under the Florida Administrative Code (F.A.C.). Degradation of water quality in an OFW is prohibited except under certain circumstances. Pollutant discharges must not lower existing ambient water quality. Any activity within an OFW requiring a Florida Department of Environmental Protection (FDEP) Environmental Resource Permit (ERP) must be deemed to be clearly in the public interest. FDOT should coordinate and consult with FDEP requiring specific permitting requirements relating to this OFW. Increased and/or future development in the corridor surrounding the project may also have indirect and cumulative impacts on the Blackwater River and its tributaries.

Another issue of concern regarding water quality is the potential for the project to impact any private or public drinking water wells identified as being within the project area. A review of the presence of and/or location of drinking water wells should be identified. The project should avoid impact to any private or public potable drinking water wells or their source. Coordination with local and state drinking water agencies may be necessary.

The various Alternatives are located within proximity to water bodies that are impaired for various pollutants (fecal coliform and mercury). The PD&E study should include a review of water quality standards in water bodies listed on the Clean Water Act 303(d) list of impaired waters. It should also evaluate sources of water quality impairments and TMDL requirements and how these regulations and/or requirements may affect the proposed project and environmental resource permits. It is recommended that FDOT consult with the Florida Department of Environmental Protection water quality program on this issue.

The proposed SR 87 Connector will include a bridge crossing over the Blackwater River and possibly other water bodies. Construction activities such as construction of a new bridge structure would likely have direct, indirect, and cumulative impacts on these surface waters. Impacts should be evaluated and clearly documented in PD&E technical documents or reports. Various bridge construction alternatives and opportunities to avoid or minimize impacts to water quality should be evaluated and considered to the greatest extent practicable.

Due to the potential to have a significant impact on surface water bodies, the PD&E study should include an indepth review of surface water quality data, any water quality concerns in nearby surface waters and wetlands, and groundwater concerns and/or issues. FDOT should consult with FDEP and the Northwest Florida Water Management District on stormwater permitting issues and other water quality issues relating to point and nonpoint source discharges into surface water bodies.

Coordinator Feedback: None

3 *Moderate* assigned 01/29/2010 by Lauren P. Milligan, FL Department of Environmental Protection

Coordination Document: Permit Required

Dispute Information: N/A

Identified Resources and Level of Importance: Every effort should be made to maximize the treatment of stormwater runoff from the proposed highway connector project, as area stormwater discharges to the Blackwater River and eventually to the Yellow River Marsh Aquatic Preserve, both designated Outstanding Florida Waters (OFW) under section 62-302.700(9), F.A.C., and afforded a high level of protection under sections 62-4.242(2) and 62-302.700, F.A.C. Pursuant to section 373.414(1), F.S., direct impacts to these waterbodies and associated wetlands must be demonstrated to be "clearly in the public interest" as part of the Environmental Resource Permitting (ERP) process. We recommend that the PD&E study include an evaluation of existing area stormwater treatment adequacy and details on the future stormwater treatment facilities. The permit applicant may be required to demonstrate that the proposed stormwater system meets the design and performance criteria established for the treatment and attenuation of discharges to OFWs, pursuant to Chapter 62-346, F.A.C., and the DEP and NFWWMD ERP Applicant's Handbook.

Comments on Effects to Resources: Stormwater runoff from the road surface may alter adjacent wetlands and surface waters through increased pollutant loading. Natural resource impacts within and adjacent to the proposed highway right-of-way will likely include alteration of the existing surface water hydrology and natural drainage patterns, and reduction in flood attenuation capacity of area creeks, ditches, and sloughs as a result of increased impervious surface within the watershed. Stormwater treatment should be designed to maintain the natural pre-development hydroperiod and water quality, as well as to protect the natural functions of adjacent wetlands, floodplains, and waterbodies.

Coordinator Feedback: None

4 *Substantial* assigned 01/29/2010 by Leigh Brooks, Northwest Florida Water Management District

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information: N/A

Identified Resources and Level of Importance: Surface water - Stormwater runoff from this project would directly affect the Blackwater River and its extensive floodplain, Clear Creek and one unnamed intermittent stream. The Blackwater River and its receiving water Blackwater Bay are components of the larger Pensacola Bay Watershed and are Surface Water Improvement and Management (SWIM) priority waters of the NFWFMD. The District has identified the river and floodplain corridor as a priority for acquisition. The Blackwater River receives additional protection as an Outstanding Florida Water. The river is federally designated critical habitat for the Gulf sturgeon (*Acipenser oxyrinchus desotoi*).

The western end of the segment lies in a subwatershed of the Blackwater River which is verified impaired for fecal coliforms and mercury.

Ground water - GIS analysis indicates 6 wells within a 500 foot buffered polygon. The western end of the polygon lies in an area "vulnerable" to contamination of the Floridan Aquifer and the majority of the polygon shows as "more vulnerable" to contamination of the surficial aquifer, according to the Florida Aquifer Vulnerability Assessment. The District has identified uplands at the southern terminus of the corridor for acquisition to protect groundwater recharge.

Slope - Approximately 18 acres of the buffered polygon have a slope greater than 10 percent, mainly on the southern bank of the Blackwater River floodplain. This ranks as one of the lower amounts of the six alternatives. Steep slopes are susceptible to erosion initiated by ground disturbance.

Comments on Effects to Resources: Construction and long-term use of roadway facilities would generate non-point source pollution associated with stormwater runoff and would impact receiving water bodies and wetlands. Crossing of Clear Creek or disturbance of the escarpment west of the creek could subject this water body to water quality problems. It is not explained why the alignment in the area of the Clear Creek escarpment veers away from the powerline.

Assurances should be provided that stormwater management and treatment as well as erosion control of sloped areas will be sufficient to prevent long-term, cumulative degradation of water quality and aquatic habitat.

Additional Comments (optional): Considering the data provided as well as internal data and analysis, all of the proposed alternatives would have substantial impacts to water resources. The apparent least adverse impact would occur under Alternative 1, followed by Alternative 2. Alternatives 3, 4, 5 and 6 have greater wetland impacts, infringe on protected conservation lands, and have greater potential secondary and cumulative impacts. Alternative 3 has the greatest impact to floodplains, and Alternatives 4, 5 and 6 are more vulnerable to storm surges. Alternative 2 presents a concern due to alignment along a steeply sloped, erosion-prone valley wall and proximity to a stream.

Appropriate stormwater treatment systems, best management practices, and land planning must be employed to prevent nonpoint source pollution and other potential impacts. The crossing for Clear Creek needs to be more clearly described in order to assess potential impacts. Roadway design should incorporate extended elevated bridges spanning the full floodplain with no supports in the flow way to reduce impacts to wetlands, allow for hydrologic and habitat connectivity, and protect water quality.

Project work would require stormwater permitting in compliance with the Environmental Resource Permitting program, per Chapter 62-346, F.A.C.

Additional local permit requirements may apply as well.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Water Quality and Quantity issue for this alternative: Federal Highway Administration

Coordinator Summary: Wetlands Issue

4 Substantial assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has evaluated comments from the FL Department of Environmental Protection (FDEP), the US Environmental Protection Agency (USEPA), the Northwest Florida Water Management District (NFWFMD), US Fish and Wildlife, National Marine Fisheries Service and the US Army Corps of Engineers (ACOE) and recommends a Degree of Effect of Substantial.

The FDOT understands the importance of the wetlands in the project area and we will make every effort to prioritize the alternatives, as well as the final alignment within the selected alternative, utilizing agency comments in order to reduce to the extent practicable any adverse impacts. Many of the comments made about the project were similar for all of the above agencies. The FDOT understands the common concerns, as per the agencies requests, that must be included in the PD&E Study process to be the following:

1. The GIS review found wetlands within 100, 200, and 500 ft buffers of all alternatives. FDOT understands that all alternatives will have an impact to water resources that must be mitigated.
2. The project area encompasses a major river system, the Blackwater and Big Coldwater Creek, Clear Creek and Pond Creek Tributaries.
3. Permitting - An environmental resource permit will be necessary and will need to reflect efforts made to reduce impacts. In addition, the project may require a Section 404 wetland permit.
4. The Blackwater River - designated Special Outstanding Florida Waters and Surface Water Improvement and Management (SWIM) priority waters - flows into the Yellow River Marsh Aquatic Preserve and Class II shellfish harvesting waters. The designations thus reflected in Chapters 253, 258, 373, and 403, F.S., afford the highest level of state protection to the Blackwater River and the downstream estuarine system of Blackwater Bay and East Bay. Every effort should be made to minimize impacts to these areas.
5. Possible Direct Effects that should be reviewed include stream diversion, wetland fill, erosion, etc. Indirect effects include stormwater runoff, increased pollutants into surface waters and wetlands (water quality), etc.
6. The Blackwater River is included in Critical Habitat Unit 4 - the Yellow River System - for the federally threatened Gulf sturgeon.

Comments on Alternative 1 were made by several agencies. The FLDEP stated that the EST indicated there are 184.2 acres of palustrine and 5.1 acres of riverine wetlands within the 500 ft buffer zone. FDOT will use this information during the PD&E study as a comparison to the other alternatives' impacts. The NFWFMD and USFWS further reviewed the NWI wetlands as well and stated that Alternative 1 has the second LEAST wetland acreage impact of the six alternatives. They further added that the alternative lies in the Gulf Coastal Lowlands and Western Highlands physiographic provinces and the Southern Pine Plains and Hills ecoregion. The alternative goes through a wetland designated as critical habitat for the reticulated flatwoods salamander (*Ambystoma bishop*), a federally listed endangered species. A known historic breeding pond for the flatwoods salamander, vegetated with pond cypress and slash pine, is located on private property adjacent to Alternatives 1-3. This pond and its associated uplands are designated as Critical

Habitat Unit RFS-2, Subunit A (162 acres). FDOT also notes the comments include that White-top pitcherplant (*Sarracenia leucophylla*) and Curtiss' sandgrass (*Calamovilfa curtissii*), state-endangered and state-threatened wetland plants respectively, occur within 600 feet of the alternative, and there is potential for them to occur within the alternative. Threatened and Endangered Species reviews will be done as part of the PD&E Study.

Current land use according to 2004 FDEP Land Use and Land Cover is primarily electrical power transmission lines, mixed upland and wetland forests, and coniferous plantations. The NFWFMD commented that Alternative 1, followed by Alternative 2 would have the apparent least adverse impacts. Finally, the NFWFMD also noted that Alternative 1 coincides for the most part with an existing utility alternative, thus minimizing new habitat fragmentation. Roughly 20 percent of this alternative is wetlands.

The National Marine Fisheries Services (NMFS) also commented on Alternative 1. After a site inspection on January 12, 2010 to assess the potential concerns within Pensacola Bay, East Bay, Blackwater Bay, and the lower reaches of Blackwater River, they found that it does not appear Alternative 1 will directly impact NMFS trust resources. However, FDOT understands that stormwater treatment systems must be designed to prevent indirect impacts to Blackwater Bay, East Bay, and Pensacola Bay.

Finally, the USACOE commented that the EST found that approximately 33.8 acres of NWI Palustrine wetlands and 0.7 acres of Blackwater River exist within the 100 ft buffer. They commented that Alternative 1 provides the third LEAST overall impacts to jurisdictional waters of the United States and appears to be the most favorable to the purpose and need of the project and the geographical areas the alternative is intended to service than any of the other alternatives.

Finally, there were several similar recommendations that should be noted that will be included as part of the PD&E Study. They were:

1. Early interagency planning and coordination of wetland mitigation alternatives are required in accordance with Section 373.4137, Florida Statutes;
2. The design of bridges and culverts should be adjusted to minimize unavoidable impacts;
3. Stormwater treatment systems should be designed to prevent degraded water from reaching estuarine and marine habitats;
4. Mitigation measures should be implemented to replace the areal extent as well as the functions and values of the aquatic resources that would be impacted.

The FDOT is aware that suitable mitigation measures include wetland restoration or enhancement, culvert/bridge design measures to enhance fish and wildlife movement at crossings, stream restoration measures such as replacing riprap with biotechnical erosion controls, or restoring suitable meander geometry. In addition, land acquisition and mitigation opportunities proximate to the project impacts may be the best options to offset wetland functional losses.

A Wetlands Evaluation Report (WER) and Endangered Species Biological Assessment (ESBA) will be prepared as part of the PD&E Study. Coordination with the commenting agencies will occur throughout the PD&E Study.

No Comments were received from the Federal Highway Administration (FHWA).

ETAT Reviews: Wetlands Issue: 6 found

4 *Substantial* assigned 01/29/2010 by Lauren P. Milligan, FL Department of Environmental Protection

Coordination Document: Permit Required

Dispute Information:N/A

Identified Resources and Level of Importance: The proposed project area encompasses a major river system - the Blackwater River and Big Coldwater Creek, Clear Creek and Pond Creek tributaries - together with associated floodplains and wetland areas, and is hydrologically connected to Blackwater Bay, East Bay and Pensacola Bay in the Blackwater River and Pensacola Bay basins.

The EST indicates that there are 184.2 acres of palustrine and 5.1 acres of riverine wetlands within the 500-ft. buffer zone of the project.

Comments on Effects to Resources: The environmental resource permit applicant will be required to eliminate or reduce the proposed wetland resource impacts of highway connector construction to the greatest extent practicable:

- Minimization should emphasize avoidance-oriented corridor alignments, wetland fill reductions via pile bridging and steep/vertically retained side slopes, and median width reductions within safety limits.
- Wetlands should not be displaced by the installation of stormwater conveyance and treatment swales; compensatory treatment in adjacent uplands is the preferred alternative.
- After avoidance and minimization have been exhausted, mitigation must be proposed to offset the adverse impacts of the project to existing wetland functions and values. Significant attention is given to forested wetland systems and seagrass beds, which are difficult to mitigate.
- The cumulative impacts of concurrent and future road improvement projects in the vicinity of the subject project should also be addressed.

Additional Comments (optional): In general, DEP recommends that transportation improvements projects not infringe upon environmentally sensitive areas such as flood zones, rare or endangered species' habitats, wetlands, or natural drainage courses. Such lands should be preserved for their environmental and aesthetic significance. The Blackwater River - designated Special Outstanding Florida Waters and Surface Water Improvement and Management (SWIM) priority waters - flows into the Yellow River Marsh Aquatic Preserve and Class II shellfish harvesting waters. The designations thus reflected in Chapters 253, 258, 373, and 403, F.S., afford the highest level of state protection to the Blackwater River and the downstream estuarine system of Blackwater Bay and East Bay.

Coordinator Feedback: None

3 *Moderate* assigned 01/29/2010 by Madolyn Dominy, US Environmental Protection Agency

Coordination Document: No Selection

Dispute Information:N/A

Identified Resources and Level of Importance: Resources: Wetlands, wetlands habitat, water quality

Level of Importance: These resources are of a high level of importance in the State of Florida and within the project corridor(s). Wetlands provide for water quality enhancement, flood storage capacity, drainage, and wildlife habitat. Due to the potential to directly impact wetlands, EPA is assigning a moderate degree of effect to the wetlands issue for Alternatives 1 through 6.

Comments on Effects to Resources: A review of GIS analysis data (National Wetlands Inventory) in the EST for wetlands indicates that there are

wetlands present along the roadway corridor within the 100, 200, and 500 foot buffer distances for all Alternatives.

The project has the potential to impact wetland resources, including wetlands associated with Blackwater River and its associated tributaries. Development activities, including the construction of new roadways, have the potential to directly and/or indirectly affect wetlands, water quality, and aquatic habitats associated with clearing operations and construction of new stream or wetland crossings.

Any land clearing operations involving vegetation removal with mechanized equipment such as front-end loaders, backhoes, or bulldozers with shear blades, rakes or discs in wetlands; or windrowing of vegetation, land leveling; or other soil disturbances are considered placement of fill material in wetlands and would likely require a Section 404 wetland permit. Any unavoidable wetland impacts should preferably be mitigated within the same watershed to result in no net loss of aquatic functions.

Other issues of concern include increased stormwater runoff and the increase of pollutants into surface waters and wetlands as a result of the roadway and other point and nonpoint sources. Design and planning should ensure that stormwater runoff does not enter surface waters directly. This can include the use of enhanced swales, stormwater ponds, and sediment basins to capture and treat post-construction stormwater runoff to minimize impacts to important aquatic resources and wetlands. Every effort should be made to maximize the treatment of stormwater. Stormwater treatment areas/ponds should be designed to protect the function of surrounding wetlands, floodplains, and surface water features.

It is recommended that the environmental phase (PD&E) of the project include delineation of wetlands; functional analysis of wetlands to determine their value and function; an evaluation of stormwater pond sites to determine their impact on wetlands; a review of surface water crossings (such as bridges) to determine their impact on wetlands and floodplains; avoidance and minimization strategies for wetlands; and mitigation plans to compensate for adverse impacts.

Indirect and cumulative effects on wetlands should be evaluated to identify and quantify incremental and cumulative impacts on natural resources (wetlands) as a result of past, present, and reasonably foreseeable actions, including the proposed project and other land use actions.

Coordinator Feedback: None

4 Substantial assigned 01/29/2010 by Leigh Brooks, Northwest Florida Water Management District

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information: N/A

Identified Resources and Level of Importance: Analysis provided shows that within a 500-foot buffer there are 144 acres of wetlands as determined by FDEP 2004 Land Use and Land Cover data (identified by DOT as NFWFMD Wetlands 2004) and 189 acres of NWI wetlands, mostly palustrine with some riverine wetlands. Adding water to FDEP Wetlands 2004 to provide a more direct comparison with NWI acreage results in 151 acres of wetlands and water. Roughly 20 percent of the corridor is wetlands. Alternative 1 has the second least wetland acreage impact of the six alternatives.

The corridor lies in the Gulf Coastal Lowlands and Western Highlands physiographic provinces and the Southern Pine Plains and Hills ecoregion. The corridor goes through a wetland designated as critical habitat for the reticulated flatwoods salamander (*Ambystoma bishop*), a federally listed endangered species. White-top pitcherplant (*Sarracenia leucophylla*) and Curtiss' sandgrass (*Calamovilfa curtissii*), state-endangered and state-threatened wetland plants respectively, occur within 600 feet of the corridor, and there is potential for them to occur within the corridor. Current land use according to 2004 FDEP Land Use and Land Cover is primarily electrical power transmission lines, mixed upland and wetland forests, and coniferous plantations. Land cover is mostly wooded.

Comments on Effects to Resources: New roadway construction would have direct impacts to environmentally sensitive wetlands. Potential indirect impacts include sedimentation, nonpoint source pollution, and hydrologic alternation. Impacts to riverine and palustrine habitats may be expected as a result of direct and indirect impacts.

Additional Comments (optional): Considering the data provided as well as internal data and analysis, all of the proposed alternatives would have substantial impacts to water resources. The apparent least adverse impact would occur under Alternative 1, followed by Alternative 2. Alternatives 3, 4, 5 and 6 have greater wetland impacts, infringe on protected conservation lands, and have greater potential secondary and cumulative impacts. Alternative 3 has the greatest impact to floodplains, and Alternatives 4, 5 and 6 are more vulnerable to storm surges. Alternative 2 presents a concern due to alignment along a steeply sloped, erosion-prone valley wall and proximity to a stream.

It is noteworthy that Alternative 1 coincides for the most part with an existing utility corridor, thus minimizing new habitat fragmentation.

Early interagency planning and coordination of wetland mitigation alternatives are required in accordance with Section 373.4137, Florida Statutes. Advance consultation and consensus between the District and FDOT are required.

Coordinator Feedback: None

4 Substantial assigned 01/22/2010 by Mary Mittiga, US Fish and Wildlife Service

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information: N/A

Identified Resources and Level of Importance: Water resources within the proposed corridor include the Blackwater River, its floodplain, and potentially high quality wetland communities. The Blackwater River is designated as an Outstanding Florida Water and is included in Critical Habitat Unit 4 - the Yellow River System - for the federally threatened Gulf sturgeon. The Blackwater River drains to Blackwater Bay, part of the Yellow River Marsh Aquatic Preserve. Wetlands may include areas of cypress/gum swamp, pitcher plant prairie, and wet pine flatwoods. A known historic breeding pond for the endangered reticulated flatwoods salamander (*Ambystoma bishopi*) vegetated with pond cypress and slash pine is located on private property adjacent to Corridors 1-3. This pond and its associated uplands are designated as Critical Habitat Unit RFS-2, Subunit A (162 acres).

Comments on Effects to Resources: The Blackwater River, its tributaries, floodplain, and associated wetlands provide habitat for a large number of fish and wildlife species including federally protected species. The Service recommends implementing measures to protect fish and wildlife resources from potential impacts resulting from the proposed project. Direct impacts may include, but are not limited to, stream diversion or culverting, wetland fill, erosion, siltation, and loss of shoreline vegetation. Indirect impacts may include introduction of exotic species adapted to colonizing disturbed areas, fragmentation of contiguous habitats, altered hydrology, increases in stormwater discharge, altered patterns of sediment erosion and deposition, increased impervious surface area, and additional disturbance in newly opened areas.

Impacts to wetlands and waterbodies can be minimized in a number of ways. Avoidance is often the most effective measure to reduce impacts; it can be accomplished either by locating the route to circumvent the most valuable resources or by reducing the project footprint. Unavoidable impacts can

be minimized by adjusting the design of bridges or culverts. The Service recommends using fluvial geomorphology analyses to design crossing structures that permit normal bedload movement, a low flow channel to allow fish passage and preserve water quality, and additional culverts installed above bankfull level to maintain the hydrologic regime of floodplain areas. These measures may also result in a reduction of blowout events and maintenance requirements. Measures should be implemented to minimize any hydrologic alteration to surrounding wetlands, especially to habitat used by the flatwoods salamander. Information should be provided on Best Management Practices (BMPs) to prevent degradation of aquatic resources from erosion, siltation, and nutrient discharges associated with the project site. Specialized measures may be required to prevent inadvertent impacts to high quality wetlands and designated critical habitat units.

After all efforts have been taken to avoid and minimize impacts to wetlands and other waters of the United States, mitigation measures should be implemented to replace the areal extent as well as the functions and values of the aquatic resources that would be impacted. Suitable mitigation measures include wetland restoration or enhancement, culvert/bridge design measures to enhance fish and wildlife movement at crossings, stream restoration measures such as replacing riprap with biotechnical erosion controls, or restoring suitable meander geometry. Land acquisition and mitigation opportunities proximate to the project impacts may be the best options to offset wetland functional losses.

Coordinator Feedback: None

2 *Minimal* assigned 01/15/2010 by David A. Rydene, National Marine Fisheries Service

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: Pensacola Bay, East Bay, Blackwater Bay and the lower reaches of the Blackwater River. These systems contain estuarine and marine habitats used by federally-managed fish species and their prey.

Comments on Effects to Resources: Alternative 1 - NMFS staff conducted a site inspection of the project area on January 12, 2010, to assess potential concerns to living marine resources within Pensacola Bay, East Bay, Blackwater Bay, and the lower reaches of the Blackwater River. The lands adjacent to the proposed alignment appear to be mostly forested palustrine wetlands. It does not appear that Alternative 1 will directly impact NMFS trust resources. However, the road would cross both the Blackwater River (just northeast of Cooper Basin) and Clear Creek, both of which drain to Blackwater Bay, East Bay, and Pensacola Bay. Therefore, the project may result in indirect impacts to downstream NMFS trust resources. Use of the road could result in an increase in the amount of sediment, oil and grease, metals, and other pollutants reaching estuarine habitats utilized by marine fishery resources. Therefore, NMFS recommends that stormwater treatment systems be designed to prevent degraded water from reaching estuarine and marine habitats. Best management practices should be employed during road construction to prevent siltation of downstream estuarine habitats. Additionally, the manner in which the road may affect drainage within the watershed and hydrologic functions should be considered.

Coordinator Feedback: None

3 *Moderate* assigned 12/24/2009 by Randy Turner, US Army Corps of Engineers

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: A review of GIS data provided in the screening tool indicates approximately 33.8 acres of NWI Palustrine wetlands and 0.7 acres of the Blackwater River exist within the 100-foot buffer. The wetlands appear to be high quality. The subject wetlands play a vital role for flood storage, water quality issues, and drainage for the surrounding areas. A functional analysis would determine the extent of their value.

Comments on Effects to Resources: Alternative 1 provides the third least overall impacts to jurisdictional waters of the United States and appears to be the most favorable to the purpose and need of the project and the geographical areas the corridor is intended to service than any of the other alternatives. Direct impacts would include the elimination of functions and values of the wetlands within the roadway footprint, any disturbed buffer, and create secondary effects along adjacent waters/buffer.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Wetlands issue for this alternative: Federal Highway Administration

Coordinator Summary: Wildlife and Habitat Issue

4 *Substantial* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has evaluated comments from the Naval Air Station Whiting Field, US Fish and Wildlife and the FL Fish and Wildlife Conservation Commission and recommends a Degree of Effect of Substantial.

FDOT understands the Naval Air Station's (Whiting Field) concern over the potential for increased bird animal strike hazard for Alternative 1 because NASWF aircraft fly entry and exit routes along the SR 87/89 Corridor. If this Alternative is chosen, it is understood mitigation strategies may need to be taken like minimizing stormwater retention to 48 hours, bird monitoring, and/or mowing schedule updates to reduce bird animal strike hazards.

The US Fish and Wildlife Service commented that all six alternatives cross critical habitat for the threatened Gulf Sturgeon (*Acipenser oxyrinchus desotoi*). Alternatives 1-3 cross 0.9 miles upstream of Cooper Basin, an area where fish congregate while Alternatives 4-6 cross the Blackwater River south of Milton, where fish are not known to congregate. Also, Alternatives 1-3 may impact flatwoods salamander habitat while all alternatives cross waters that are accessible to the federally endangered West Indian manatee (*manatus latirostris*). In addition, there is potential for the endangered red-cockaded woodpecker (RCW) (*Picoides borealis*) to occur along the proposed roadway where suitable habitat is present. The Department understands the importance of protecting the above species and their habitat. We have taken note of the proposed impact minimization techniques the US Fish and Wildlife Service listed in their comments. These include measures to protect the Gulf Sturgeon, including limiting in-water work activities when Gulf Sturgeon are present to the extent practicable, as well as using appropriate Standard Manatee Construction Conditions if they are found to be in the project area. In addition, the assessment of critical habitat for the flatwoods salamander and the RCW will be completed as suggested in the comments. Finally, the Department understands that new roadways may affect migrating animals and potentially costly measures such as designing bridges to span riverine floodplains and preserving wide riparian buffers should be reviewed and considered when prioritizing the alternatives.

The Florida Fish and Wildlife Conservation Commission (FWC) completed a 500 ft GIS analysis of the 6 Alternatives within the 4 corridors. The results of the analysis indicated that all six Alternative Corridors can be considered moderately to mostly rural in nature, as High and Low Impact Urban Lands vary from a low of only 79.0 acres for Alignment 3 to a high of 208.2 acres along Alignment 6. Wetlands along the Alignments vary from a low of 143.1 acres for Alignment 2, to a high of 256.3 acres for Alignment 6. Upland forests range from a low of 318.3 acres for Alignment 5 to a high of 763.8 acres

along Alignment 3. The wetlands are predominately characterized by freshwater marsh, cypress swamp, bay swamp, hardwood swamp, mixed wetland forest, and open water, while uplands are represented by upland hardwood forest, mixed hardwood-pine forests, pinelands, longleaf pine-turkey oak sandhills, and shrub and brushland. Based on known range and preferred habitat type, the following species listed by FWC as Endangered (E), Threatened (T), or Species of Special Concern (SSC) may occur and be impacted: gopher tortoise (T), Eastern indigo snake (T), Florida pine snake (SSC), gopher frog (SSC), pine barrens treefrog (SSC), snowy egret (SSC), little blue heron (SSC), tricolored heron (SSC), white ibis (SSC), wood stork (E), Southeastern American kestrel (T), red-cockaded woodpecker (SSC), Gulf sturgeon (SSC), blackmouth shiner (E), and possibly the eastern chipmunk (SSC) and Florida black bear (T). In addition, we understand FWCs concern that all six Alternatives could adversely impact good to high quality upland and wetland habitat as indicated by scores of 6 to 7 or 6 to 8 (10 = high, 0 = Low) on FWC's Integrated Wildlife Habitat Ranking System map. We will investigate the location of Priority Wetlands and Biodiversity Hotspots as outlined by FWC utilizing the FWC GIS Shapefiles to ensure minimal impact while offering the public a safe new transportation corridor. Priority Wetlands for Wetland Dependent Listed Species are capable of supporting 1 to 3 focal species in uplands, and 1 to 3 focal species in wetlands. In addition, high quality areas of upland and wetland habitat that have been designated by FWC as Biodiversity Hotspots can support 3 to 4, 5 to 6, and 6 to 7 or more focal species; and are within regional areas officially designated as consultation areas for the listed Gulf Sturgeon, and the red-cockaded woodpecker. In addition, FDOT's environmental research will include habitat location assessments for the other species FWC notes in their comments as species of conservation need: eastern cottontail rabbit, northern red-headed woodpecker, hairy woodpecker, bobwhite, southeastern fox squirrel, spotted skunk, striped skunk, southern hognose snake, alligator snapping turtle, Gulf coast box turtle, Escambia map turtle, Gulf coast smooth softshell turtle, carpenter frog, Florida bog frog, seal salamander, bald eagle, peregrine falcon, loggerhead shrike, brown headed nuthatch, ironcolor shiner, speckled darter, and southern starhead topminnow. Another comment made by FWC was concern that all of the alternatives have the potential to impact the Blackwater River Heritage State Trail, the Coldwater Creek Preserve, the Blackwater River State Forest, the Black Water River Water Management Area, and the lands of the Naval Air Station at Whiting Field. With the exception of the Heritage Trail, we believe that we may be able to avoid these properties utilizing FWCs GIS shapefiles and Santa Rosa County's Parcel data to locate them. In addition, the Heritage Trail, if impacted, will be incorporated into the roadway cross section to ensure its location is not dramatically shifted from its existing position along the historic railroad alignment.

In addition, we will review the following Best Management Practices (BMPs) during this PD&E Study listed by FWC as we determine which Alternative will effectively provide a new transportation corridor, while causing the least amount of negative environmental and social impacts. The BMPs include the review of the existing corridor for potential improvements to minimize impacts, development of a vegetative cover map to be used to mitigate habitat loss, assurance that mitigation sites are in the same regional area, coordination with FWC on listed species surveys, inclusion of design options that include spanning streambeds and wetland floodplain areas where possible, and inclusion of drainage design options to reduce the need for offsite Drainage Retention Areas.

No Comments were received from the Federal Highway Administration (FHWA) or the US Forest Service.

ETAT Reviews: Wildlife and Habitat Issue: 3 found

2 *Minimal* assigned 02/14/2010 by Randy Roy, Naval Air Station Whiting Field

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information:N/A

Identified Resources and Level of Importance: Alternative 1 may have minimal to moderate impact on Naval Air Station Whiting Field's mission.

Comments on Effects to Resources: Potential for increased Bird Animal Strike Hazards. Retention pond development to support project alternatives - Possible measures/mitigation strategies to consider would be to minimize storm water retention to 48-hours, provide active bird monitoring, and implement mowing schedules (Bird Animal Strike Hazard concerns). NASWF mission aircraft routinely fly entry and exit routes along/adjacent the 87/89 corridor.

Coordinator Feedback: None

4 *Substantial* assigned 01/22/2010 by Mary Mittiga, US Fish and Wildlife Service

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information:N/A

Identified Resources and Level of Importance: Federally Protected Species

Federally listed threatened and endangered species may occur along the proposed alignment. All six corridors cross critical habitat for the threatened Gulf sturgeon (*Acipenser oxyrinchus desotoi*). The Blackwater River from its confluence with Big Coldwater Creek downstream to its discharge into Blackwater Bay is included within Critical Habitat Unit 4 - the Yellow River System. Corridors 1-3 cross the Blackwater River approximately 0.9 mile upstream of Cooper Basin, an area where numerous fish congregate for summer resting and staging. Sturgeon occurrence drops significantly upstream of Cooper Basin at the proposed crossing. Corridors 4-6 cross the Blackwater River just south of Milton. While fish migrate through this area, it is not a known major congregation site.

Corridors 1, 2, and 3 may impact Critical Habitat Unit RFS-2, subunit A, for the endangered reticulated flatwoods salamander. Threats to this unit from the proposed corridor include potential urban development, potential hydrologic alterations to the habitat, and the potential for fire suppression.

The proposed project includes work in waters accessible to the federally endangered West Indian manatee (*Trichechus manatus latirostris*), an occasional, warm month visitor to the panhandle.

There is potential for the endangered red-cockaded woodpecker (RCW) (*Picoides borealis*) to occur along the proposed roadway where suitable habitat is present.

Other Fish and Wildlife Resources

The Blackwater River, its tributaries, floodplain, and associated wetlands provide habitat for a large number of fish and wildlife species. Much of the Blackwater River floodplain ranks as Priority 1 (highest) and 2 conservation areas for rare species using the Florida Natural Areas Inventory (FNAI) Habitat Conservation Priorities Geographic Information System data layer. Corridors 2 and 3 will cross proposed acquisition lands for the Clear Creek/Whiting Field Florida Forever project. Corridor 3 will cross the Phase I project between Whiting Field Naval Air Station and a 1,400-acre block of conservation lands to the northeast acquired under Florida Forever in 2009. Corridor 2 will cross proposed acquisition lands for Phase II of the project to the southwest of Whiting Field. The purpose of these conservation lands is to create a conservation land buffer to the Naval Air Station, protect surrounding water bodies, and allow for expanded recreation opportunities for the State of Florida.

Comments on Effects to Resources: Federally Protected Species

A complete description and map of Critical Habitat Unit 4 are given in the Designation of Critical Habitat for the Gulf Sturgeon Final Rule available on the internet at <http://alabama.fws.gov/gsf/>. Measures to protect the Gulf sturgeon should be incorporated in your project plans, and should include construction constraints to avoid and minimize effects to the sturgeon, their riverine habitat, and the primary constituent elements (PCEs) of sturgeon critical habitat essential to their conservation. In-water work activities should be avoided to the extent practicable during periods when Gulf sturgeon are present in their riverine habitat.

Measures to avoid and minimize impacts to reticulated flatwoods salamander critical habitat should be included in your project plans. Affects to the PCEs of critical habitat should be specifically assessed. Information on PCEs is available in the Designation of Critical Habitat for Frosted Flatwoods Salamander and Reticulated Flatwoods Salamander Final Rule at: <http://www.fws.gov/panamacity/species/pdf/FlatwoodsSalamander.pdf>. Your review should address direct, secondary, and cumulative effects to both the wetland and upland components of critical habitat. Examples of indirect effects include hydrologic alteration, reduced ability to manage property by prescribed burning, spread of exotic nuisance species, and roadkill.

We recommend including appropriate Standard Manatee Construction Conditions for your project to provide protection measures for the manatee.

For the RCW, if work impacts pine stands 30 years of age the stand should be surveyed for RCW. No other records for federally listed species were identified with the FNAI database. However, we assume that listed species occur in suitable ecological communities. Site surveys should be made to determine the presence or absence of listed species whenever suitable habitat is present.

Other Fish and Wildlife Resources

During this early phase of project development, the Service recommends implementing measures to protect fish and wildlife resources from potential impacts resulting from the proposed project. Corridors 2 and 3 will diminish the conservation value of the proposed acquisition lands for the Clear Creek/Whiting Field Florida Forever Project. Corridors 2 and 3 may facilitate growth in proximity to the Naval Air Station, impacting fish and wildlife habitat and reducing their land manager's ability to use prescribed burning to enhance conservation lands.

All the new corridors will result in further fragmentation of the regional landscape. Increasing fragmentation is correlated with isolated, less stable wildlife populations, particularly for small mammals. Roads form a barrier for taxa that are sensitive to surface microclimate changes (temperature, moisture, chemistry), and may detrimentally affect groups such as reptiles and amphibians which migrate annually to breeding sites. The Florida black bear and other wide-ranging species are especially vulnerable to roadkill because of frequent road crossing. Some measures which help maintain habitat linkage include designing bridges to span the riverine floodplain, preserving wide riparian buffers, and/or adding multi-species wildlife. These costs should also be incorporated in the project's cost-benefit analysis.

Degradation of adjacent habitat is a secondary effect of the proposed roadway, especially for migratory birds. Many migratory bird species prefer "deep woods" and require land tracts with low edge:area ratios. Increasing fragmentation results in smaller islands of habitat, favoring species adaptable to woodland edges. Mitigation costs for secondary effects in these habitats should be considered.

Coordinator Feedback: None

4 Substantial assigned 01/19/2010 by Scott Sanders, FL Fish and Wildlife Conservation Commission

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information: N/A

Identified Resources and Level of Importance: The Habitat Conservation Scientific Services Section of the Florida Fish and Wildlife Conservation Commission (FWC) has coordinated an agency review of ETDM #12597, Santa Rosa County, and provides the following comments related to potential effects to fish and wildlife resources on this Programming Phase project.

The Project Description Summary states that this project involves a Project Development and Environment (PD&E) Study to evaluate the potential for providing a new roadway corridor to serve as the missing link or bypass for connecting SR-87 South and SR-87 North as an Alternative to the existing shared facility of SR-87 South to SR-87 North via US-90, a portion of which runs through the Town of Milton, and is currently operating at a failing Level of Service (LOS F). According to information provided by the Florida Department of Transportation's (FDOT's) consultant, the No-build Alternative, and the Transportation System Alternative that involves improvements to intersections for traffic flow and safety and other measures along the existing Alignment will necessarily involve work in the downtown Historic District of Milton where Right-of-way expansion is problematic. However, since the existing SR-87 Alignment was not provided on the Environmental Screening Tool as one of the project options, we are unable to provide an assessment and comparison of fish and wildlife resource and habitat impacts together with the following four new corridors and six Alternative Alignments that have been identified for evaluation for improved mobility and safety on the project in the PD&E Study:

1. Corridor 1 (Alternative 1) extends from the existing intersection of US-90 and SR-87 South crossing the Blackwater River near the existing eastern power line easement; then continues to follow the power easement and connects to SR-87 North near the southern split of SR-87 North and SR-89, for a total length of about 6.5 miles.
2. Corridor 2 (Alternative 2) also runs to the north from the US-90 and SR-87 South intersection and crosses the Blackwater River near the easternmost power line crossing easement, and then runs just to the north of Corridor 1 adjacent to the Clear Water Creek environmental lands. This proposed route of about 7.2 miles then runs west to connect to SR-87 North near the northern split of SR-87 North and SR-89.
3. Corridor 3 (Alternative 3), which is about 10.5 miles in length, also runs to the north from the US-90 and SR-87 South intersection and crosses the Blackwater River near the easternmost power line crossing easement, then extends north on the east side of Whiting Field, possibly using portions of the Pat Brown Road Right-of-way (ROW). North of Whiting Field, the corridor will attempt to pass through a narrow gap between the Nature Conservancy and Florida Forever Lands, and Whiting Field, at a location where it can intersect SR-87 North, south of Southridge Road and north of Whiting Field.
4. Corridor 4 (Alternatives 4, 5, & 6) will evaluate areas to the south of US-90, which will involve a new crossing of the Blackwater River between Bagdad and Milton. The southern corridor will generally head west from SR-87 South, sharing a portion of US-90 ROW that will be expanded, and connect to SR-87 North at the intersection of US-90 and SR-87 North. The western end of this corridor near SR-87 North will utilize the ROW of the Blackwater Heritage Trail, and incorporate the trail in the roadway cross section. This corridor is approximately 5.6 to 6.5 miles long.

A GIS analysis within 500 feet of each of the six Alternative Alignments 1, 2, 3, 4, 5, and 6 within Corridors 1, 2, 3, and 4 was accomplished; and Table

1 provides the acreage of native upland forests and forested and herbaceous wetland plant community types, along with man-altered land use types that include Agricultural lands and High and Low Impact Urban lands. The results of our analysis indicates that all six Alternative Alignments can be considered moderately to mostly rural in nature, as High and Low Impact Urban Lands vary from a low of only 79.0 acres for Alignment 3 to a high of 208.2 acres along Alignment 6. Wetlands along the Alignments vary from a low of 143.1 acres for Alignment 2, to a high of 256.3 acres for Alignment 6. Upland forests range from a low of 318.3 acres for Alignment 5 to a high of 763.8 acres along Alignment 3.

According to our assessment of all six Alternatives, wetlands are predominately characterized by freshwater marsh, cypress swamp, bay swamp, hardwood swamp, mixed wetland forest, and open water, while uplands are represented by upland hardwood forest, mixed hardwood-pine forests, pinelands, longleaf pine-turkey oak sandhills, and shrub and brushland. Man-altered land use types include High and Low Impact Urban lands, and Agricultural lands. Based on known range and preferred habitat type, the following species listed by our agency as Endangered (E), Threatened (T), or Species of Special Concern (SSC) may occur and be impacted directly by loss or degradation of habitat within the project area Right-of-way (ROW), or indirectly due to associated residential or commercial development within the adjacent regional area: gopher tortoise (T), Eastern indigo snake (T), Florida pine snake (SSC), gopher frog (SSC), pine barrens treefrog (SSC), snowy egret (SSC), little blue heron (SSC), tricolored heron (SSC), white ibis (SSC), wood stork (E), Southeastern American kestrel (T), red-cockaded woodpecker (SSC), Gulf sturgeon (SSC), blackmouth shiner (E), and possibly the eastern chipmunk (SSC) and Florida black bear (T).

The following wildlife species that may occur in and adjacent to the project area, while not officially listed, are considered by our agency as species of greatest conservation need due to long-term and chronic habitat loss: eastern cottontail rabbit, northern red-headed woodpecker, hairy woodpecker, bobwhite, southeastern fox squirrel, spotted skunk, striped skunk, southern hognoe snake, alligator snapping turtle, Gulf coast box turtle, Escambia map turtle, Gulf coast smooth softshell turtle, carpenter frog, Florida bog frog, seal salamander, bald eagle, peregrine falcon, loggerhead shrike, brown headed nuthatch, ironcolor shiner, speckled darter, and southern starhead topminnow.

Furthermore, our analysis included an overall accounting, provided in Table 2, which includes a comparison of the potential for impacts or possible adverse interaction for all six Alternative Alignments with important and sensitive ecological features in the regional study area. Overall, our screening shows that all new Alignments have the potential for at least moderately high to substantial adverse effects on fish and wildlife and habitat resources. First, based on the information provided in the project description, all new Alignments would require construction of a new bridge across the Blackwater River and floodplain. Second, all six Alignments could adversely impact good to high quality upland and wetland habitat as indicated by scores of 6 to 7 or 6 to 8 (10 = high, 0 = Low) on FWC's Integrated Wildlife Habitat Ranking System map; impact areas designated by our agency as Priority Wetlands for Wetland Dependent Listed Species, which are capable of supporting 1 to 3 focal species in uplands, and 1 to 3 focal species in wetlands; impact high quality areas of upland and wetland habitat that have been designated by FWC as Biodiversity Hotspots that can support 3 to 4, 5 to 6, and 6 to 7 or more focal species; and are within regional areas officially designated as consultation areas for the listed Gulf sturgeon, and the red-cockaded woodpecker. Furthermore, all Alignments could impact the Blackwater and Yellow Rivers and other streams which support listed and rare fish species, while some of these Alignments could in addition adversely affect Clear Creek and Pond Creek. Finally, all Alignments could impact the Blackwater River Heritage State Trail, while other Alignments in varying degrees could adversely impact the Coldwater Creek Preserve, Blackwater River State Forest, Black Water River Water Management Area, and the lands of the Naval Air Station at Whiting Field.

Comments on Effects to Resources: Direct effects of the project could be substantial for all Alignments. Our analysis shows that all new Alignments have the potential for the direct loss of high quality and productive upland, wetland, and riverine habitat and will, to some degree, adversely impact public conservation lands by clearing within the ROW footprint, interchanges, and the construction of Drainage Retention Areas (DRAs).

Indirect effects could also be substantial since these new Alignments would cause detrimental habitat fragmentation and isolation of wetland and upland habitat; and result in impacts to a moderate number of listed species by decreased habitat connectivity and increased mortality through roadkills. Increased stormwater runoff could also degrade aquatic and wetland habitat by reduced water quality and through increased turbidity. Long-term Impacts from increased commercial and residential development could be encouraged and facilitated by the project and naturally follow the new roadway, causing significant loss and degradation of habitat, as could the construction of new secondary roads to connect with the new bypass. Public lands could be indirectly impacted by increased noise, artificial lighting, and possibly the reduced ability to perform prescribed burning necessary to maintain appropriate habitat conditions because of liability and concern for public safety due to smoke drift to the new roadway.

Additional Comments (optional): The following recommendations and Best Management Practices (BMPs) are offered for consideration in future planning efforts so that adequate funding can be justified for the PD&E study to design the project in a manner to avoid, minimize, or mitigate project effects to wildlife species and their habitat:

1. The Project Description defines the No-Build Alternative and the Transportation System Management (TSM) Alternative along the existing alignment, in addition to the new Bypass Alternatives, as viable parts of the total project to be addressed in the PD&E Study. The TSM Alternative along the existing Alignment appears to have potential for the least impacts to fish and wildlife and habitat resources. If improvement of the existing Alignment is found not to be a viable option after further study, we recommend a concerted effort during the PD&E Study Phase to avoid, minimize or properly mitigate impacts to the fish and wildlife and habitat resources we have detailed in our assessment above.

2. A vegetative cover map and accounting by acreage for each plant community type should be made for the affected project area. Compensatory mitigation for all upland and wetland habitat loss should be accomplished. If wetlands are mitigated under the provisions of Chapter 373.4137 F.S., the proposed mitigation sites should be located within the immediate or same regional area; be functionally equivalent; equal to or of higher functional value; and as or more productive as the impacted wetlands. Land acquisition and restoration of appropriate tracts adjacent to existing public lands, or other tracts placed under conservation easement or located adjacent to large areas of jurisdictional wetlands that currently serve as regional core habitat areas, would be supported by our agency. An important focus of the selection process for mitigation lands for this project should include a strong consideration of, and habitat replacement for the listed and non-listed birds, mammals, amphibians, reptiles, and fish that are discussed above as potentially occurring in the project area.

3. Surveys for listed species should be accomplished within and adjacent to the ROW of all Alignments and proposed sites for DRAs. The methodology for these surveys should be coordinated with FWC early in the PD&E Study and follow appropriate survey techniques or guidelines to determine presence, absence, or probability of occurrence of various species, and to assess habitat quality. These study methods should be designed considering the potential listed species discussed above. Please note that some species are known to use atypical habitat types and transitional habitat areas; therefore, due diligence and thorough coverage during field investigations are key to adequately determining presence or absence of all species. Based on the survey results, a plan should be developed to address direct, indirect, and cumulative effects of the project on wildlife and habitat resources, including listed species, and other important species we have included above. Avoidance, minimization, and mitigation measures should also be formulated and implemented. Permits may be needed from the FWC for impacts to the gopher tortoise, and possibly other listed species; and due diligence and coordination with FWC is recommended.

4. We strongly recommend that all new bridges over streams, and in particular the Blackwater River, be constructed to span completely the streambed and wetland floodplain along with the upland transitional area. We also recommend that FDOT develop and implement customized BMPs especially formulated for this project as they pertain to dredging and filling, control of siltation and turbidity, and the nutrient loading associated with discharge of roadside runoff, to reduce effects within freshwater basin wetlands and riparian systems. The PD&E Study should address the potential for treating roadside runoff within the median and roadside swales to reduce the need for offsite Drainage Retention Areas and avoid habitat loss. Appropriately designed fencing should also be erected within rural habitat areas to reduce roadkills, and improve public safety. The design of this fence should include smaller mesh at ground level to preclude access onto the roadway by various mammals, amphibians and reptiles. Our biologists are available to provide input on appropriate fence design.

5. Construction equipment staging areas; storage of oils, greases, and fuel; fill and roadbed material; and equipment maintenance activities should be sited in previously disturbed areas far removed from streams, wetlands, or surface water bodies. Staging areas, along with borrow areas, should also be surveyed for listed species. Close coordination with federal, state and local permitting agencies is recommended.

We appreciate the opportunity to provide input on highway design and the conservation of fish and wildlife resources. Please contact Terry Gilbert at (850) 402-6311 or email terry_gilbert@urscorp.com to initiate the process for further overall coordination on this project.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Wildlife and Habitat issue for this alternative: Federal Highway Administration, US Forest Service

ETAT Reviews and Coordinator Summary: Cultural Issues

Coordinator Summary: Historic and Archaeological Sites Issue

3 *Moderate* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has reviewed the comments submitted by the Federal Highway Administration (FHWA), the Florida Department of State, and the Miccosukee Tribe of Indians of Florida, and recommends a Degree of Effect of Moderate.

The FDOT is aware of Historic State Road 1 that parallels US 90. The design for a possible crossing will include measures to address this historic facility. Likewise, as part of this Study the Department will be performing a CRAS to identify and evaluate any cultural resources that might be affected by this project.

No comments were received from the Seminole Tribe of Florida.

ETAT Reviews: Historic and Archaeological Sites Issue: 3 found

3 *Moderate* assigned 04/08/2010 by Cathy Kendall, Federal Highway Administration

Coordination Document: PD&E Support Document As Per PD&E Manual

Dispute Information: N/A

Identified Resources and Level of Importance: Alternatives 1, 2 and 3 may have fewer impacts for historic resources than alternatives 4-6. Alternatives 1-3 have a potentially historic structure located within 500 feet of the proposed road improvement. Alternatives 4-6 have a potentially historic structure within 200 feet of the proposed improvement. Alternatives 4-6 also have a potentially significant archaeological site (lumber mill) located within 100 feet. Alternatives 4-6 also have a potentially historic bridge located within 500 feet.

All alternatives potentially impact SR 1, an NRHP resource known as Red Brick Road.

Alternative 4 goes through a portion of the town of Milton, and would potentially impact historic structures that have not yet been identified.

Comments on Effects to Resources: Impacts to known historic sites should be avoided. A CRAS will determine the significance of the known as well as the yet to be identified historic properties. Of all the alternatives, Alternative 4 may have the most impacts to historic resources. This will need to be verified with the CRAS.

Coordinator Feedback: None

3 *Moderate* assigned 01/25/2010 by Alyssa McManus, FL Department of State

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: There are few identified resources located within the Alternative 1 project corridor. There is one National Register- listed site, which is Florida State Road No. 1, 8SR1313, located within the 100 ft boundary of this project corridor. This is also the only resource group identified within this buffer.

In 1929, Florida State Road 1 became part of the federal highway system and officially became US 90. It was listed in the NRHP in 2002. Careful consideration should be taken to determine if this project will adversely affect this resource.

Comments on Effects to Resources: The lack of identified cultural resources most probably reflects the lack of any formal CRAS for this project corridor. Also, it is unknown what impact this project will have on State Road 1. For this reason, we are recommending that a CRAS be performed to identify and evaluate any cultural resources that might be affected by this project.

Coordinator Feedback: None

2 *Minimal* assigned 01/19/2010 by Steve Terry, Miccosukee Tribe of Indians of Florida

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: There are no recorded archaeological sites reported near this project. However, a Cultural Resources Survey will need to be done to ascertain if there are any archaeological sites within the project boundaries.

Comments on Effects to Resources: Once a Cultural Resources Survey has been done, then effects, if any, to archaeological sites can be ascertained.

Additional Comments (optional): If the Cultural Resources Survey shows there are no archaeological sites that will be impacted by this project, then no further consultation is necessary. However, if the Cultural Resources Survey does show that archaeological sites will be impacted by this project, then further consultation with the Miccosukee Tribe should be done.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Historic and Archaeological Sites issue for this alternative: Seminole Tribe of Florida

Coordinator Summary: Recreation Areas Issue

3 Moderate assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has reviewed the comments submitted by the Florida Department of Environmental Protection (FDEP) and the US Environmental Protection Agency (EPA), and recommends a Degree of Effect of Moderate.

The FDOT is aware Alternate 1 will need to cross the Blackwater Heritage State Trail. As such, coordination and mitigation as necessary will be pursued with OGT, the Board of Trustees of the Internal Improvement Trust Fund or any other Governing Board.

No Comments were received from the Federal Highway Administration (FHWA) or the National Park Service.

ETAT Reviews: Recreation Areas Issue: 2 found

3 Moderate assigned 01/29/2010 by Lauren P. Milligan, FL Department of Environmental Protection

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information: N/A

Identified Resources and Level of Importance: Alternative 1 crosses the Blackwater Heritage State Trail.

Comments on Effects to Resources: These lands contain significant natural communities and numerous element occurrences of listed species, as indicated by the Florida Natural Areas Inventory. The Department is interested in preserving the area's natural communities, wildlife corridor functions, natural flood control, stormwater runoff filtering capabilities, aquifer recharge potential, and recreational trail opportunities. Therefore, future environmental documentation should include an evaluation of the primary, secondary, and cumulative impacts of roadway construction on the above public lands and proposed acquisition sites.

Additional Comments (optional): Under Article X, Section 18 of the Florida Constitution (as amended in 1998), dispositions of state-owned conservation lands are restricted to those lands "no longer needed for conservation purposes." If the proposed highway connector construction activities necessitate right-of-way creation within these state and water management district lands, the applicant will need to request that the Board of Trustees of the Internal Improvement Trust Fund or Northwest Florida Water Management District Governing Board determine whether the subject properties are no longer needed for conservation purposes. This requirement must be met before the conveyance of these lands can proceed. In addition, please be advised that proposals to utilize state conservation lands may be required to meet the guidelines of the state's linear facility policy, POLICY Use of Natural Resource Lands by Linear Facilities As Approved By Board of Trustees of the Internal Improvement Trust Fund on January 23, 1996.

Coordinator Feedback: None

3 Moderate assigned 01/28/2010 by Madolyn Dominy, US Environmental Protection Agency

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: Resources: Recreation Areas - recreational trails, conservation lands, wildlife management areas, Florida Forever BOT Projects, Florida Managed Areas, Greenways and Trails, Public Parks, etc.

Level of Importance: These recreational areas are of a high level of importance in the State of Florida. A moderate degree of effect is being assigned to this issue for the proposed project Alternative 1 (ETDM #12597, SR 87 Connector).

Comments on Effects to Resources: The alignment for Alternative 1 is within close proximity to the Blackwater Heritage State Trail. The Blackwater Heritage State Trail is part of Florida's System of Greenways and Trails and is managed by the Florida Park Service. It is the State's westernmost rail trail and runs from Milton to Whiting Field Naval Air Station. The trail could be directly and indirectly impacted by the roadway project.

EPA is assigning a moderate degree of effect to this issue due to the fact that the roadway could impact this recreation area. Also, resulting development in the corridor would have significant indirect and cumulative impacts on these types of resources. FDOT should evaluate direct, indirect, and cumulative impacts to recreation areas features such as the one listed and any other public or private parks within the vicinity. The PD&E study should include a survey of the area to identify if any recreation areas which would require a Section 4(f) review are present in the project area. Opportunities to avoid and or minimize impacts and fragmentation to recreational resources should be evaluated and considered to the greatest extent practicable.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Recreation Areas issue for this alternative: Federal Highway Administration, National Park Service

Coordinator Summary: Section 4(f) Potential Issue

3 Moderate assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has reviewed the comments from the Federal Highway Administration (FHWA) and recommends a Degree of Effect of Moderate.

As outlined in the FHWA comments, the SR 1 Red Brick Road (Trail) historic site, and the Blackwater River Heritage Trail will be crossed with this

corridor. As such, in conjunction with the CRAS that will be prepared for this Study a determination of applicability will be needed to determine if the facilities are Section 4(f)resources.

ETAT Reviews: Section 4(f) Potential Issue: 2 found

3 *Moderate* assigned 04/08/2010 by Cathy Kendall, Federal Highway Administration

Coordination Document: PD&E Support Document As Per PD&E Manual

Dispute Information:N/A

Identified Resources and Level of Importance: Alternatives 3-6 have potential impacts to recreational lands or lands used as a wildlife refuge, that may be protected under Section 4(f).

All alternatives have potential to affect historic resources that may be protected under Section 4(f). The extent of these potential historic resources for each alternative are described below (as previously stated in comments for historic resources). Alternatives 4-6, however, appear to have greater potential to impact historic resources, which may be protected under Section 4(f)

Alternatives 1, 2 and 3 may have fewer impacts for historic resources than alternatives 4-6. Alternatives 1-3 have a potentially historic structure located within 500 feet of the proposed road improvement. Alternatives 4-6 have a potentially historic structure within 200 feet of the proposed improvement. Alternatives 4-6 also have a potentially significant archaeological site (lumber mill) located within 100 feet. Alternatives 4-6 also have a potentially historic bridge located within 500 feet.

All alternatives potentially impact SR 1, an NRHP resource known as Red Brick Road.

Alternative 4 goes through a portion of the town of Milton, and would potentially impact historic structures that have not yet been identified.

Comments on Effects to Resources: Impacts to known parks, recreation and wildlife refuge areas and historic sites protected under Section 4(f) should be avoided. A CRAS will determine the significance of the known as well as the yet to be identified historic properties. Of all the alternatives, Alternative 4 may have the most impacts to historic resources. This will need to be verified with the CRAS. A determination of applicability will be needed to determine if each park, recreation area or wildlife refuge area is, in fact, a Section 4(f) resource.

Coordinator Feedback: None

N/A *N/A / No Involvement* assigned 01/15/2010 by Anita Barnett, National Park Service

Coordination Document: No Involvement

Dispute Information:N/A

Identified Resources and Level of Importance: None found.

Comments on Effects to Resources: None found.

Coordinator Feedback: None

ETAT Reviews and Coordinator Summary: Community Issues

Coordinator Summary: Aesthetics Issue

2 *Minimal* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) recommends a Degree of Effect of Minimal for aesthetics.

The majority of land within the project area is agriculture with a few residential homes dispersed in the area. The proposed roadway improvements should not significantly alter any views or vistas, but may contribute to changing the rural character of the area. However, the Blackwater River is an established aesthetic feature in the project area. The proposed river crossing is to co-locate with a major power transmission line that crosses the river. Therefore, the Alternative crosses the river in an area that already has a significant disruption to the view sheds.

During the Project Development and Environment (PD&E) Study, a noise evaluation will be conducted. In addition, input from the public will be solicited on potential project effects on community aesthetics. The FDOT will consider incorporating aesthetic enhancements such as landscaping, into project design plans. Coordination with the community will occur throughout the PD&E Study.

No comments were received from the Federal Highway Administration (FHWA), the Florida-Alabama Transportation Planning Organization (TPO).

ETAT Reviews: Aesthetics Issue: None found

The following organization(s) were expected to but did not submit a review of the Aesthetics issue for this alternative: Federal Highway Administration

Coordinator Summary: Economic Issue

1 *Enhanced* assigned 04/20/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) recommends a Degree of Effect of Enhanced for economic.

Access to intermodal facilities and movement of goods and freight are also important considerations in the development of an effective transportation system. This is an enhancement provided with this Alternative by providing a link from northern areas of the County to areas in the southern end of the County. In addition it would establish the needed SIS link between Whiting Field and I-10 and the SR 87S SIS facility. The Santa Rosa County Aviation Industrial Park will also be provided improved access to the SIS facilities to the south.

The bicycle and pedestrian enhancements and improvements proposed along the new facility would increase safety, pedestrian mobility, connectivity between residential and nonresidential areas, and would provide access for transportation disadvantaged populations. As a result of the proposed improvements, property values for commercial uses within the County that benefit from this Alternative are likely to increase along with the County's tax base.

The FDOT will conduct public outreach to residents and businesses in the area to solicit input on the project, particularly concerning access. The FDOT will also develop and maintain channels of communication between the proposed subdivision developers, the City of Milton and Santa Rosa County officials, and the NASWF concerning the proposed project, including notifying them of upcoming public meetings.

No comments were received from the Federal Highway Administration (FHWA), and the Florida-Alabama Transportation Planning Organization (TPO).

ETAT Reviews: Economic Issue: None found

The following organization(s) were expected to but did not submit a review of the Economic issue for this alternative: Federal Highway Administration

Coordinator Summary: Land Use Issue

2 *Minimal* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation has reviewed the comments submitted by the Florida Department of Community Affairs (DCA), and the Naval Air Station Whiting Field (NASWF), and recommends a Degree of Effect of Minimal.

Through consultation with Santa Rosa County Land Use staff, it was confirmed that the County's Map 4-3 "Needs Not Cost Feasible with Existing Resources," modified November 2008, the project is identified and it was on the previous Map 4-4 "Not Cost Feasible with Existing Revenue Sources," dated April 2002. Only one general alignment was shown which is similar to the general alignment in the TPO's Long Range Transportation Plan. The map does not, however, show the alternative alignments because they are determined through the corridor analysis and PD&E study. One will be selected as the preferred alignment, and it will go into the Comprehensive Plan. It will remain on the "Not Cost Feasible" map until we can show construction is cost feasible.

In addition, funding for this project is on Table 10-1 of the Schedule of Capital Improvements, page 10-13 of the Comprehensive Plan. It was \$490,000 in FY 09, a federal earmark. The description is not more specific because we generally use the language of the earmark itself; however, we can be more specific in the future. This PD&E study is actually funded by three earmarks with the \$490,000 as the second earmark. The first was originally appropriated in FY 07, so it is not shown in the Schedule of Capital Improvements, since it was outside the five-year window of the schedule: FY 08 - FY 12. The third was \$475,000 appropriated for FY 10, which should be added to the Comprehensive Plan. No funding has been identified for the further phases of final design, right-of-way, or construction. But, this is typical of most projects. It is very rare that a project is funded through all phases at one time. The funding that we knew of at the time is in the Schedule of Capital Improvements. All earmark funds have been in the TIP and STIP.

The County also believes that if an alternative is not found to the existing roadways, sprawl will extend even further beyond the study area, congestion will worsen on US 90/SR 87 and job growth in particular in the East Milton industrial area will halt. The County's Comprehensive Plan also provides guidance on development around the military base, but application of the land development code (LDC) further defines, for instance, protections for military airport zones (MAZs). In the LDC, some types of development are compatible with air operations, such as industrial development. The County is building an aviation industrial park adjacent to NAS Whiting Field, made possible by an agreement with the Navy.

Santa Rosa County is nationally known for its cooperation with the Navy to achieve goals of both the County and the military. So, at the very general level of the Comprehensive Plan, a project may appear to be inconsistent, but in fact stronger protections exist such as in the LDC.

The project is also in the Florida - Alabama Transportation Planning Organization (TPO)'s 2025 Long Range Transportation Plan Cost Feasible Plan, adopted in Dec 2005.

The Federal Highway Administration (FHWA) did not provide comments.

ETAT Reviews: Land Use Issue: 2 found

3 *Moderate* assigned 03/02/2010 by Gary Donaldson, FL Department of Community Affairs

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: Consistency review for proposed State Road 87 Connector project

Reviewed for consistency with the Santa Rosa County Comprehensive Plan and the City of Milton Comprehensive Plan

The State Road 87 Connector ETDM project is a proposed new roadway in Santa Rosa County which consists of six alignment alternatives associated with this review. The project is intended to provide an alternative to the existing shared facility of State Road 87 and US 90 which currently operates at a failing level of service. The indicated need for a new corridor is to provide additional capacity and improve regional connectivity.

Alternatives 1, 2 and 3 identify alternative connections to State Road 87 and US 90, which are located northeast of the City of Milton. Alternatives 2 and 3 traverse areas adjacent to Florida Forever lands. Alternatives 4, 5 and 6 connect State Road 87 to US 90 south of the City of Milton crossing the Blackwater River. The alternatives south of Milton are intended to route traffic around the City of Milton Historic District.

A portion of State Road 87 is identified in the Santa Rosa Comprehensive Plan 2008-2025 Comprehensive Plan Capital Improvements Element as a Federal earmark multi-laning project. However, the Element does not reference project boundaries associated with this specific improvement. The ETDM Project Description does not identify a funding source for this project.

None of the project alternatives are identified on Map 4-3 of the Santa Rosa County 2020 Future Transportation Map and none are identified on Map A of the City of Milton Future Transportation Map.

The State Road 87 Connector project (including its alternatives) is not consistent with the comprehensive plans of Santa Rosa County or the City of Milton for the following reasons:

(1) It is not specifically identified in the Santa Rosa County or the City of Milton Comprehensive Plans.

- (2) It is not identified on the Future Transportation Maps of Santa Rosa County or the City of Milton.
- (3) It is not specifically identified in the Five-Year Capital Improvement Schedule of Santa Rosa County and the City of Milton.
- (4) It is inconsistent with Policy 8.1.D.6 of the Conservation Element of the Santa Rosa County Comprehensive Plan, which states that new public infrastructure should not be planned where development may be promoted in environmentally sensitive lands.
- (5) It is inconsistent with Objective 3.3A of the Future Land Use Element of the Santa Rosa County Comprehensive Plan, which requires that future development within adopted Military Airport Zones (MAZs) not negatively impact current and long term viable use of airfields by limiting incompatible land uses.

The project should be modified to be consistent with the policies identified above and the local government comprehensive plans should be revised to include this project before it advances into the FDOT Five Year Work program.

Staff review of the project addressed the following concerns:

Land use --

Alternatives 1, 2, and 3 of the State Road 87 Connector project are located to the northeast of the City of Milton and connect through land designated as "Agriculture (AG)" on Map 3-1 of the Santa Rosa County Future Land Use Map. Construction of a roadway along these corridors has the potential to promote urban sprawl, based on the definitions in Rules 9J-5.003(134) and 9J-5.006(5), F.A.C.

(134) "Urban sprawl" means urban development or uses which are located in predominantly rural areas, or rural areas interspersed with generally low-intensity or low-density urban uses, and which are characterized by one or more of the following conditions: (a) The premature or poorly planned conversion of rural land to other uses; (b) The creation of areas of urban development or uses which are not functionally related to land uses which predominate the adjacent area; or (c) The creation of areas of urban development or uses which fail to maximize the use of existing public facilities or the use of areas within which public services are currently provided. Urban sprawl is typically manifested in one or more of the following land use or development patterns: Leapfrog or scattered development; ribbon or strip commercial or other development; or large expanses of predominantly low-intensity, low-density, or single-use development.

The information provided in the ETDM Project Description is insufficient to determine the impacts of the project on urban sprawl or greenhouse gas emissions. The project has been discussed with Santa Rosa County planning staff who indicated that the selected alignment alternative is intended to be constructed as a limited access roadway. If so, contribution to urban sprawl and greenhouse gas emissions may be mitigated, depending on usage and access characteristics.

Objective 3.1.A of the Santa Rosa County Comprehensive Plan Future Land Use Element requires future land uses to be coordinated in order to ensure the protection of natural resources and with the availability of adequate infrastructure, the reduction of greenhouse gas emissions. Alternatives 1,2, and 3 connect through agricultural, single family residential, industrial and conservation/recreation land uses. While Alternatives 4, 5 and 6 maximize the use of existing roadway infrastructure as identified in the ETDM Project Description, Alternatives 1,2 and 3 as described may not protect natural resources and reduce greenhouse gas emissions.

The portions of alternatives traversing through the City of Milton connect through commercial uses as identified on the City Future Land Use Map. The City of Milton Comprehensive Plan does not contain policies within its plan that address the reduction of greenhouse gas emissions.

Transportation --

The ETDM Purpose and Need Statement identifies State Road 87 as a vital evacuation route for Gulf Breeze and Navarre residents to travel northbound. State Road 87 is also identified as a hurricane evacuation route on Map 4-2 Santa Rosa Future Transportation Map 2025. However, the current route connects using a congested portion of US 90 through the City of Milton downtown section.

The project is identified in the MPO 2020 Cost Feasible Plan as a Project Development and Environment Study (PD& E) consisting of preliminary design phases. The roadway corridor selected will be a two-lane facility with right-of way acquired for a four lane facility. No funding sources have currently been identified for the project. Further, the anticipated residential and business growth of Santa Rosa County emphasizes the need for an improved roadway network which will better facilitate traffic along the existing corridor.

Conservation -

Policy 8.1.D.6 of the Santa Rosa County Comprehensive Plan Conservation Element requires that new public infrastructure be compatible with future and existing land uses and should not promote increased development located in environmentally sensitive lands. The proposed roadway alternatives located to the north and east of the City of Milton (Alternatives 1, 2 and 3) are located in agriculturally designated areas on the Santa Rosa County Future Land Use Map. Portions of the roadway alternatives are also located close to the Clear Creek/Whiting Field Florida Forever Project Boundary. Construction of a new roadway through and around areas designated for conservation has the potential to jeopardize environmental resources located in and around the Florida Forever project Boundary and surrounding agricultural areas. The project is therefore inconsistent with Santa Rosa Comprehensive Plan Policy 8.1.D.6.

Military Facility-

Objective 3.3.A of the Santa Rosa County Comprehensive Plan Future Land Use Element requires that future development within adopted Military Airport Zones (MAZs) and Public Airport Zones (PAZs) not negatively impact current and long term viable use of the airfield by limiting incompatible land uses. Portions of the proposed location of roadway Alternatives 1, 2 and 3 are located within, or near the Airport Zones identified on Map 3-18 of the Future Land Use Map Series (NAS Whiting Field Military Airport Zone (MAZ) Map) contained within the Santa Rosa County Comprehensive Plan. The map identifies Accident Potential Zones within the MAZ boundaries. Accident Potential Zones refer to areas with a greater potential for accidents to occur around airport facilities.

Alternatives 2 and 3 of this project are inconsistent with Objective 3.3.A of the Santa Rosa County Comprehensive Plan and Map 3-18 of the Santa Rosa County Future Land Use Map Series (NAS Whiting Field Military Facility) because of safety concerns involving the potentially adverse impacts of new roadway construction and vehicle traffic passing through Airport Zone boundaries around the existing military facility. Alternative 1 is located near the Airport Zone, but is located outside of the Airport Zone boundary.

Comments on Effects to Resources: see above

Coordinator Feedback: None

2 *Minimal* assigned 02/14/2010 by Randy Roy, Naval Air Station Whiting Field

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information: N/A

Identified Resources and Level of Importance: Alternative 1 will have minimal to moderate effects on Naval Air Station Whiting Field's (NASWF) mission.

Comments on Effects to Resources: Possible increase in development immediately adjacent NASWF. Though existing zoning regulations and an approved Joint Land Use Study are in place to protect the installation from incompatible development, it is important to highlight potential consequences with development trends adjacent project area. Detailed maps and land development code can be reference and included in the assessment (references are located on the Santa Rosa County Planning and Zoning website).

NASWF has two multi-year agreements to acquire conservation lands and properties adjacent the installation. The goal is to partner with county and state to conserve environmentally sensitive lands and buffer the installation's mission from incompatible development. Encourage study incorporate language/maps identifying these targeted areas of concern and their potential impacts on the planning/alternative selection. The specifics in regards to these on-going conservation efforts are listed in the Florida Forever project list (Clear Creek I, Clear Creek II, and a potential add-on project called Wolfe Creek Forest). Santa Rosa County and NAS Whiting Field have also partnered in developing an Area of Concern Map (available via the SRC Planning and Zoning website).

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Land Use issue for this alternative: Federal Highway Administration

Coordinator Summary: Mobility Issue

1 *Enhanced* assigned 04/21/2010 by FDOT District 3

Comments: The FDOT agrees with the Florida Department of Environmental Protection and recommends a Degree of Effect of Enhanced.

This project will not only improve mobility for motoring traffic, but it will also enhance bicycle and pedestrian travel by providing an improved and expanded network.

The Federal Highway Administration (FHWA) and the Federal Transit Administration did not provide comments.

ETAT Reviews: Mobility Issue: 1 found

1 *Enhanced* assigned 01/29/2010 by Lauren P. Milligan, FL Department of Environmental Protection

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information: N/A

Identified Resources and Level of Importance: The project provides connectivity between several "High" Multi-Use Trail Priority Corridors: the Blackwater Heritage Trail, the Highway 191 (Munson Highway) Corridor and the Whiting Bike Trail Corridor. Alternative 1 crosses the Blackwater Heritage Trail; Alternative 3 is in close proximity to the Naval Air Station at Whiting Field, the Coldwater Creek Florida Forever Project and the proposed Blackwater Heritage State Trail Extension; and multiple alternatives cross the Florida National Scenic Trail. Steps should be taken to ensure the protection and enhancement of the existing trails. Inclusion of a multi-use trail facility within the entire project area could enhance connectivity between the various existing and future trail systems, alleviate traffic and enhance mobility while enhancing alternate forms of transportation. Location of the road alignment could, however, make access difficult for trail users. Future adjacent development could affect the trail by generating increased vehicular traffic. Enhancements to alternate transportation and trail safety would occur if a grade separated crossing (for the trail) is included with the roadway design. Coordination is recommended to ensure that impacts to the trail are given due consideration and that they can benefit the multiple uses of the trail.

Comments on Effects to Resources: Since 1995, the Florida Department of Environmental Protection's Office of Greenways & Trails (OGT) has been working with the University of Florida to identify the best opportunities to protect ecological connectivity statewide. To that end, the Florida Ecological Greenways Network (Network) was developed through a decision support model and collaborative process involving technical input from the Florida Greenways Commission, the Florida Greenways Coordinating Council, state, regional and federal agencies, scientists, conservation groups, planners and the general public. Since its legislative adoption in 1999, the Network has been prioritized to rank all areas into classes based upon value for ecological connectivity. The Ecological Linkages represent areas that are most important to protect because of their ability to connect existing ecological hubs and because of the potential threats of development.

The proposed project is in an area that has been identified as a Critical Ecological Linkage within Florida. Because of the long range potential for this area to serve as an ecological connector for protection of wildlife, OGT staff suggests that appropriate steps be considered as part of the project. Underpasses or other steps may be appropriate in order to maintain or establish habitat connectivity and a safe path for wildlife.

For further information and assistance, please contact Ms. Robin Turner at (850) 245-2909.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Mobility issue for this alternative: Federal Highway Administration, Federal Transit Administration

Coordinator Summary: Relocation Issue

2 *Minimal* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) recommends a Degree of Effect of Minimal for relocation.

Additional ROW will be required to accommodate the improvements and associated ponds. There are a few residences within the 200-foot buffer distance that may be effected as the Alternative approaches SR 87N.

Potential residential, business, and public facility relocations will be analyzed in detail throughout the Project Development and Environment (PD&E) Study. Depending on the project alignment and alternative selected, there is a potential for displacement of residences. Relocation efforts will be further analyzed as more detailed project information and ROW needs become available. Relocations should be minimized and any identified historic residences located along the project should be avoided where reasonable and feasible. Any potential relocation should be evaluated to ensure that there are no disproportionate adverse impacts to any distinct minority, ethnic, elderly, or handicapped groups and/or low-income households.

This project will be developed in accordance with the Civil Rights Act of 1964, as amended by the Civil Rights Act of 1968. Along with Title VI of the Civil Rights Act, Executive Order 12898 (Environmental Justice) which ensures that minority and/or low-income households are neither disproportionately adversely impacted by major transportation projects, nor denied reasonable access to them by excessive costs or physical barriers (Environmental Protection Agency [EPA], 1994).

No comments were received from the Federal Highway Administration (FHWA), or the Florida-Alabama Transportation Planning Organization (TPO).

ETAT Reviews: Relocation Issue: None found

The following organization(s) were expected to but did not submit a review of the Relocation issue for this alternative: Federal Highway Administration

Coordinator Summary: Social Issue

3 Moderate assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has reviewed the comments made by the US Environmental Protection Agency (EPA) and recommends a Degree of Effect of Moderate. The FL Department of Community Affairs had no comments.

The DOT agrees with EPA's assessment that there will be social benefits from this project. However, the FDOT understands there may be issues associated with the effects caused from a new roadway facility. To address those issues, the project team will be utilizing an on-going public involvement program throughout the PD&E Study.

The Federal Highway Administration (FHWA) did not comment.

ETAT Reviews: Social Issue: 2 found

0 None assigned 03/02/2010 by Gary Donaldson, FL Department of Community Affairs

Coordination Document: No Selection

Dispute Information:N/A

Identified Resources and Level of Importance: Social impacts cannot be determined for the project at this time.

Comments on Effects to Resources: None found.

Coordinator Feedback: None

3 Moderate assigned 02/01/2010 by Madolyn Dominy, US Environmental Protection Agency

Coordination Document: No Selection

Dispute Information:N/A

Identified Resources and Level of Importance: Resources: Social impacts to features such as residential populations, residential communities, commercial businesses, social service facilities, minority or low-income populations, disadvantaged populations, archeological and historic areas or structures, etc.

Level of Importance: These resources are of a high level of importance. Impacts to these types of resources, both positive and negative, should be evaluated and documented in the PD&E phase of the project. A moderate degree of effect is being assigned to this issue for the SR 87 Alternatives.

Comments on Effects to Resources: According to the project description, the primary need for this new corridor is to provide additional capacity, and to improve regional connectivity by providing a more direct route from areas of high growth in northern Santa Rosa County, such as the Berryhill Road area, to I-10 and to areas further to the south. Likewise, access will be improved to and from I-10 for the Whiting Field U.S. Naval Air Station, and the County's Joint Use Planning Area near Whiting Field. It is also anticipated that this new facility would provide relief to Ward Basin Road and its intersection with US 90. It is also intended to provide much needed relief to the US 90 Blackwater Bridge.

Santa Rosa County has been experiencing considerable growth over the past year, and has grown in its own right, but also as a bedroom community to the greater Pensacola area. This growth has spurred the need for an improved roadway network. In addition, there are several major traffic generators within the US 90 corridor area, such as new residential developments, the Santa Rosa Criminal Justice Center, the Santa Rosa Corrections Facility, Whiting Field U.S. Naval Air Station, Team Rosa Joint Planning area near Whiting Field, and the Santa Rosa Commerce Park, which would all benefit from the capacity this facility will provide. The need for the project is also related to committed trips associated with future development in the northern portions of Santa Rosa County, as well as, the future development along the US 90 corridor, which is hindered by the existing capacity limits of US 90. Santa Rosa County has grown 173% since 1980 and is expected to grow another 92% by 2030. This increase will put further demand on the US 90/SR 87 segment, making growth and evacuation difficult due to a lack of capacity.

EPA is assigning a moderate degree of effect to this issue. There will be social benefits resulting from the project due to congestion relief and an improvement in mobility with the new SR 87 Connector project. However, there are several social issues to be considered. The project should take into account various social issues and impacts for each of the Alternatives. These issues may include, but are not limited to, population and growth estimates, community cohesion, noise, vibration, visual aesthetics, environmental justice issues, low income populations, elderly populations, economic development, land acquisition, displacements or relocations, effects on special populations, archeological and historic areas or structures, and other social features that may be affected by the project.

These issues should be evaluated and addressed during the PD&E phase of the project. EPA recommends that any negative direct and indirect impacts to social resources and affected communities be avoided or minimized to the best extent practicable. Public involvement on this project should be ongoing and continual throughout the project.

EPA recommends that a Sociocultural Effects (SCE) Evaluation be considered as detailed in the FDOT document entitled Sociocultural Effects in ETDM. This document outlines the importance of evaluating sociocultural effects throughout the transportation planning and development process. An SCE Evaluation is used to assess community impacts utilizing both quantitative and qualitative methods. The SCE Evaluation should be based on the best available data and provide for adequate public involvement and outreach activities.

Some of the issues to be considered when conducting an SCE Evaluation include: social consequences to surrounding or interconnected communities; demographics of affected community; displacement of population; increase/decrease of population as a result of the project; displacement of minority populations; and disproportionate effects on special populations. The particular types of social issues that are important for this proposed project should be evaluated.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Social issue for this alternative: Federal Highway Administration

ETAT Reviews and Coordinator Summary: Secondary and Cumulative Issues

Coordinator Summary: Secondary and Cumulative Effects Issue

4 *Substantial* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has evaluated comments from the US Fish and Wildlife Service (USFWS), and the Northwest Florida Water Management District (NFWFMD) and recommends a Degree of Effect of Substantial.

The FDOT, in conjunction with the Federal Highway Administration (FHWA), will be facilitating a task force to evaluate and provide guidance on Indirect (Secondary) and Cumulative Effects. This task force consists of representatives from the FHWA, the FDOT, various agencies and regional planning councils. The output of this task force will be guidance in the form of a White Paper along with possible revisions to the Environmental Screening Tool (EST) to facilitate Indirect and Cumulative Effects Analysis. A Cumulative Effects Evaluation will also be conducted as part of the Project Development and Environment (PD&E) Study.

ETAT Reviews: Secondary and Cumulative Effects Issue: 2 found

4 *Substantial* assigned 01/29/2010 by Leigh Brooks, Northwest Florida Water Management District

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information: N/A

At-Risk Resource: Water Quality and Quantity

Comments on Effects: Existence of the new roadway could lead to development of undeveloped proximate areas, particularly approaching SR 87 North. Conversion of the natural landscape that reduces vegetation, exposes bare soil, and alters surface hydrology would degrade water quality.

Incremental and interactive effects on wetland and floodplain resources, water quality, and associated sensitive terrestrial and aquatic habitats can be expected. These changes may reduce the quality of remaining resources and cause further wetland impacts, fragmentation, hydrologic alteration, and associated impacts to water quality and habitats. Impacts from development associated with this corridor present less of a concern because there are suitable upland areas for development, however development will increase impervious surface and could increase stormwater runoff, diminishing water quality.

Recommended Avoidance, Minimization, and Mitigation Measures: Minimizing the total project footprint, especially in sensitive areas, combined with strict stormwater controls will help minimize impacts to water quality. Impacts to wetlands and surface hydrology could be minimized this way as well, and more so by raising the roadway over wetlands and flood hazard areas in the form of a viaduct or extended elevated bridge, allowing for free movement of plants, animals and water and maintaining the natural water quality benefits provided by these lands.

Recommended Actions to Improve At-Risk Resources: - Plan stormwater treatment and management to provide for protection of both flows and water quality, and identify and implement opportunities for retrofit.

- Carefully examine and resolve any existing issues with drainage related impacts.
- Develop a detailed plan of best management practices encompassing both construction and facility design. These should be designed to protect against nonpoint source pollution (both long-term and during construction), prevent offsite wetland and water quality impacts, and maintain hydrologic connectivity.
- Protect wetland systems and functions, including isolated wetlands.
- Conduct early consultation with the District to develop wetland mitigation alternatives.
- Plan stream and bank protection measures so as to protect and/or restore riparian habitat the full width of the natural floodplain.
- Incorporate extended bridging in areas important to hydrologic and habitat connectivity.
- Minimize the total footprint of the project.
- Minimize the effective impervious area.
- Conduct advance planning with local governments and state agencies to prevent adverse cumulative impacts associated with anticipated and spin-off development.

At-Risk Resource: Wetlands

Comments on Effects: The overall and long-term cumulative effects of the proposed roadway include direct project impacts and related development along with incremental and interactive effects from anticipated and spin off development to wetland and floodplain resources, water quality, and

associated sensitive terrestrial and aquatic habitats. These changes will reduce the quality of remaining resources and cause further wetland impacts, fragmentation, hydrologic alteration, and associated impacts to water quality and habitats.

Impacts from development associated with this corridor present less of a concern because there are suitable upland areas for development.

Recommended Avoidance, Minimization, and Mitigation Measures: Early interagency planning and coordination of wetland mitigation alternatives are required in accordance with Section 373.4137, Florida Statutes.

Work with local government to discourage development activities adjacent to environmentally sensitive water resources. Determine the future land uses for currently undeveloped regions and design roadway infrastructure and mitigation measures to accommodate associated development activities.

Minimize the project footprint; use extended bridges in areas important to hydrologic and habitat connectivity.

Recommended Actions to Improve At-Risk Resources: - Follow the process for mitigation of wetland impacts required under s. 373.4137, F.S. Initiate coordination with the District as soon as possible.

- Develop a detailed plan of best management practices encompassing both construction and facility design. These should be designed to maintain hydrologic connectivity and to prevent nonpoint source pollution (both long-term and during construction), offsite wetland and water quality impacts, and habitat fragmentation.
- Protect wetland systems and functions, including isolated wetlands.
- Carefully examine and resolve any existing issues with drainage related impacts.
- Plan stream and bank protection measures so as to protect and/or restore riparian habitat the full width of the natural floodplain.
- Incorporate extended bridging in areas important to hydrologic and habitat connectivity.
- Minimize the project footprint.
- Minimize the effective impervious area.
- Conduct advance planning with local governments and state agencies to prevent adverse cumulative impacts associated with anticipated and spin-off development.

Coordinator Feedback: None

4 Substantial assigned 01/22/2010 by Mary Mittiga, US Fish and Wildlife Service

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information: N/A

At-Risk Resource: Wildlife and Habitat

Comments on Effects: The secondary effects of a new road alignment will extend outward from the roadway for variable distances, depending on the nature of the effect. Examples of secondary effects to wildlife and habitat include: transport of particulate and chemical materials, such as sediment, mineral nutrients, and heavy metals; micro-climate changes; roadkill; roadside maintenance activities; traffic noise; traffic vibration; the attraction effect of light; hydrological alterations; habitat fragmentation; disruption of wildlife movement corridors; increased human access; new development with habitat loss, and the spread of invasive, non-native plant species. A new roadway will provide access for development into adjoining natural lands which provide habitat for numerous wildlife species. Corridors 2 and 3 may result in additional development near to Naval Air Station Whiting Field, impacting land manager's ability to implement prescribed burning for habitat improvement. Due to recent rapid coastal development in Florida and throughout the U.S., the secondary and cumulative effects of new growth associated with the corridor should be evaluated.

Recommended Avoidance, Minimization, and Mitigation Measures: The following measures are recommended to avoid and minimize secondary and cumulative impacts to wildlife and habitat:

Environmentally-sensitive bridge construction should be used.

Post-project monitoring should occur regularly to determine identify and control invasive, non-native species.

Water quality protection measures to Environmental Resource Permitting (ERP) standards or better should be in place within these high quality undeveloped watersheds.

Specific water quality protection Best Management Practices (BMPs) should be developed to avoid and minimize potential effects to designated critical habitat for the Gulf sturgeon and reticulated flatwoods salamander.

Recommended Actions to Improve At-Risk Resources: None found.

At-Risk Resource: Wetlands

Comments on Effects: The secondary effects of a new road alignment will extend outward from the roadway for variable distances, depending on the nature of the effect. Examples of secondary effects to wetlands include: transport of particulate and chemical materials, such as sediment, mineral nutrients, and heavy metals; micro-climate changes; roadside maintenance activities; hydrological alterations; increased human access; new development, and the spread of invasive, non-native plant species. A new roadway can provide access for development into adjoining natural/open lands, of which much are wetlands. Due to the recent rapid coastal development in Florida and throughout the U.S., the secondary and cumulative

effects of new growth associated with the corridor should be evaluated.

Recommended Avoidance, Minimization, and Mitigation Measures: Other measures to avoid and minimize impacts to wetlands include: post-project monitoring to identify and control invasive, non-native species; additional culverts to maintain hydrologic connections between wetlands; environmentally sensitive bridge construction; and water quality protection measures.

Recommended Actions to Improve At-Risk Resources: None found.

Coordinator Feedback: None

Alternative #2 - # 2 (Segments 1a, 1b, and 2a)

Alternative Description

From:	SR87S/US90	To:	SR 87N/SR 89N
Type:	New Alignment	Status:	ETAT Review Complete
Total Length:	7.2 mi.	Cost:	
Modes:	Roadway Bicycle Pedestrian	SIS:	N

Segment Description(s)

Location and Length							
Segment No.	Name	Beginning Location	Ending Location	Length (mi.)	Roadway Id	BMP	EMP
				2.35			
				8.15			
				0.47			
				1.69			
				1.69			
				0.47			
				0.87			
				2.35			
				3.16			
				5.18			
				5.18			
				2.35			
				0.36			
				2.45			
				5.18			

Jurisdiction and Class			
Segment No.	Jurisdiction	Urban Service Area	Functional Class

Base Conditions				
Segment No.	Year	AADT	Lanes	Config

Interim Plan				
Segment No.	Year	AADT	Lanes	Config

Needs Plan				
Segment No.	Year	AADT	Lanes	Config

Cost Feasible Plan				
Segment No.	Year	AADT	Lanes	Config

Funding Sources
No funding sources found.

Project Effects Overview

Issue	Degree of Effect	Organization	Date Reviewed
Natural			
Air Quality	2 Minimal	US Environmental Protection Agency	01/26/2010
Coastal and Marine	2 Minimal	National Marine Fisheries Service	01/15/2010
Contaminated Sites	2 Minimal	FL Department of Environmental Protection	01/29/2010
Contaminated Sites	2 Minimal	US Environmental Protection Agency	01/27/2010
Farmlands	2 Minimal	Natural Resources Conservation Service	01/08/2010
Floodplains	4 Substantial	Northwest Florida Water Management District	01/29/2010
Floodplains	3 Moderate	US Environmental Protection Agency	01/28/2010

Infrastructure	No reviews recorded.		
Navigation	2	Minimal	US Army Corps of Engineers 12/24/2009
Navigation	2	Minimal	US Coast Guard 12/18/2009
Special Designations	3	Moderate	US Environmental Protection Agency 01/29/2010
Water Quality and Quantity	4	Substantial	US Environmental Protection Agency 01/31/2010
Water Quality and Quantity	3	Moderate	FL Department of Environmental Protection 01/29/2010
Water Quality and Quantity	4	Substantial	Northwest Florida Water Management District 01/29/2010
Wetlands	4	Substantial	FL Department of Environmental Protection 01/29/2010
Wetlands	3	Moderate	US Environmental Protection Agency 01/29/2010
Wetlands	4	Substantial	Northwest Florida Water Management District 01/29/2010
Wetlands	4	Substantial	US Fish and Wildlife Service 01/22/2010
Wetlands	2	Minimal	National Marine Fisheries Service 01/15/2010
Wetlands	3	Moderate	US Army Corps of Engineers 12/24/2009
Wildlife and Habitat	2	Minimal	Naval Air Station Whiting Field 02/14/2010
Wildlife and Habitat	4	Substantial	US Fish and Wildlife Service 01/22/2010
Wildlife and Habitat	4	Substantial	FL Fish and Wildlife Conservation Commission 01/19/2010
Cultural			
Historic and Archaeological Sites	3	Moderate	Federal Highway Administration 04/08/2010
Historic and Archaeological Sites	3	Moderate	FL Department of State 01/25/2010
Historic and Archaeological Sites	2	Minimal	Miccosukee Tribe of Indians of Florida 01/19/2010
Recreation Areas	4	Substantial	FL Department of Environmental Protection 01/29/2010
Recreation Areas	3	Moderate	US Environmental Protection Agency 01/29/2010
Section 4(f) Potential	3	Moderate	Federal Highway Administration 04/08/2010
Community			
Aesthetics	No reviews recorded.		
Economic	No reviews recorded.		
Land Use	3	Moderate	FL Department of Community Affairs 03/02/2010
Land Use	2	Minimal	Naval Air Station Whiting Field 02/14/2010
Mobility	1	Enhanced	FL Department of Environmental Protection 01/29/2010
Relocation	No reviews recorded.		
Social	0	None	FL Department of Community Affairs 03/02/2010
Social	3	Moderate	US Environmental Protection Agency 02/01/2010
Secondary and Cumulative			
Secondary and Cumulative Effects	4	Substantial	Northwest Florida Water Management District 01/29/2010
Secondary and Cumulative Effects	4	Substantial	US Fish and Wildlife Service 01/22/2010

ETAT Reviews and Coordinator Summary: Natural Issues

Coordinator Summary: Air Quality Issue

2 Minimal assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has evaluated comments from the US Environmental Protection Agency (USEPA) and recommends a Degree of Effect of Minimal.

The project is located in an area which is designated 'attainment' for all of the National Ambient Air Quality Standards under the criteria provided in the Clean Air Act.

An air quality analysis will be performed as part of the Project Development and Environment (PD&E) Study for this project.

The Federal Highway Administration (FHWA) did not provide comment.

ETAT Reviews: Air Quality Issue: 1 found

2 Minimal assigned 01/26/2010 by Madolyn Dominy, US Environmental Protection Agency

Coordination Document: No Selection

Dispute Information:N/A

Identified Resources and Level of Importance: Resources: Air Quality

Level of Importance: Low, due to minimal degree of effect. A minimal degree of effect is being assigned to the air quality issue for the proposed roadway project (ETDM #12597, SR 87 Connector, Alternatives 1 - 6).

Comments on Effects to Resources: Santa Rosa County (which includes the SR Connector Corridor) has not been designated non-attainment or maintenance for ozone, carbon monoxide (CO) or particulate matter (PM) in accordance with the Clean Air Act. There are no violations of National Ambient Air Quality Standards (NAAQS). Nevertheless, it is recommended that the environmental review phase of this project include air impact analyses which documents the current pollutant concentrations recorded at the nearest air quality monitors, an evaluation of anticipated emissions, and air quality trend analyses. It is also recommended that environmental reviews of the project include hot spot analyses at the points in time and places where congestion are expected to be greatest or in areas of sensitive receptors. Air quality modeling using an approved software program should be conducted to determine whether any conformity issues or violations of air quality standards are anticipated within the project area and/or counties. Current and proposed air quality requirements and standards should be used in modeling software programs.

Additional Comments (optional): As population growth and vehicle volumes increase, there is the potential to have air quality conformity and non-attainment issues in the future. FDOT, MPOs, municipalities, and regional planning agencies should conduct air quality modeling as traffic forecasts increase.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Air Quality issue for this alternative: Federal Highway Administration

Coordinator Summary: Coastal and Marine Issue

2 Minimal assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has evaluated comments from the National Marine Fisheries Service (NMFS) and recommends a Degree of Effect of Minimal.

There are several important resources in the area; Pensacola Bay, East Bay, Blackwater Bay and the lower reaches of the Blackwater River, that contain habitats used by federally-managed fish species and their prey.

On January 12, 2010, NMFS staff conducted a site inspection of these areas. From this inspection, it was found that Alternative 2 does not appear to directly impact NMFS trust resources. However, due to possible indirect impacts, the FDOT acknowledges the NMFS recommendation that stormwater treatment systems be designed to prevent degraded water from reaching estuarine habitats. In addition, drainage and hydrologic functions will be considered during the design of the project and Best Management Practices (BMPs) will be utilized during construction to prevent siltation of downstream estuarine habitats.

The Federal Highway Administration (FHWA) did not provide comments.

ETAT Reviews: Coastal and Marine Issue: 1 found

2 Minimal assigned 01/15/2010 by David A. Rydene, National Marine Fisheries Service

Coordination Document: No Selection

Dispute Information:N/A

Identified Resources and Level of Importance: Pensacola Bay, East Bay, Blackwater Bay and the lower reaches of the Blackwater River. These systems contain estuarine and marine habitats used by federally-managed fish species and their prey.

Comments on Effects to Resources: Alternative 2 - NMFS staff conducted a site inspection of the project area on January 12, 2010, to assess potential concerns to living marine resources within Pensacola Bay, East Bay, Blackwater Bay, and the lower reaches of the Blackwater River. The lands adjacent to the proposed alignment appear to be mostly forested palustrine wetlands. It does not appear that Alternative 2 will directly impact NMFS trust resources. However, the road would cross both the Blackwater River (just northeast of Cooper Basin) and Clear Creek, both of which drain to Blackwater Bay, East Bay, and Pensacola Bay. Therefore, the project may result in indirect impacts to downstream NMFS trust resources. Use of the road could result in an increase in the amount of sediment, oil and grease, metals, and other pollutants reaching estuarine habitats utilized by marine fishery resources. Therefore, NMFS recommends that stormwater treatment systems be designed to prevent degraded water from reaching estuarine and marine habitats. Best management practices should be employed during road construction to prevent siltation of downstream estuarine habitats. Additionally, the manner in which the road may affect drainage within the watershed and hydrologic functions should be considered.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Coastal and Marine issue for this alternative: Federal Highway Administration

Coordinator Summary: Contaminated Sites Issue

2 Minimal assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has reviewed the comments from the Florida Department of Environmental Protection (FDEP) and the US Environmental Protection Agency (USEPA) and recommends a Degree of Effect of Minimal.

Both agencies found that GIS data indicated there is one Brownfield area, the Santa Rosa Brownfield Redevelopment Area, and a solid waste facility, G&D Tires, Inc., within the 500-ft. project buffer zone. Due to the fact that there are few contaminated sites identified within Alternative 2, impacts are

expected to be minimal.

However, the FDOT acknowledges the FDEP comment that projects involving 'dewatering' should be discouraged and that dewatering projects would require permits / approval from the Northwest Florida Water Management District.

In addition, FDOT understands the importance of referencing "Section 120 Excavation and Embankment -- Subarticle 120-1.2 Unidentified Areas of Contamination of the Standard Specifications for Road and Bridge Construction" in the project's construction contract documents that would require specific actions by the contractor in the event of any hazardous material or suspected contamination issue arises. FDOT understands that potentially hazardous materials must be properly managed in accordance with Chapter 62-730, F.A.C. In addition, any solid wastes or other non-hazardous debris must be managed in accordance with Chapter 62-701, F.A.C. Petroleum cleanups must be managed in accordance with Chapter 62-770, F.A.C.

As suggested by the FDEP, a Contamination Screening Evaluation will be performed. Also, we have noted the FDEP comment on the new rule, 62-780, F.A.C., which became effective on April 17, 2005, as well as, Chapters 62-770, 62-777, 62-782 and 62-785, F.A.C., that were amended on April 17, 2005, to incorporate recent statutory changes. We understand that depending on the findings of the environmental assessments, there may be "off-property" notification responsibilities potentially associated with this project.

Finally, the FDOT understands the USEPA comment that remediation may be required if contaminated site features are impacted and area sampling determines pollutants are present above regulatory levels.

No Comments were received from the Federal Highway Administration (FHWA)

ETAT Reviews: Contaminated Sites Issue: 2 found

2 Minimal assigned 01/29/2010 by Lauren P. Milligan, FL Department of Environmental Protection

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: GIS data indicates that there is one brownfield area, the Santa Rosa Brownfield Redevelopment Area, and a solid waste facility, G&D Tires, Inc., within the 500-ft. project buffer zone.

Comments on Effects to Resources: Contamination Screening Evaluations should outline specific procedures that would be followed by the applicant in the event that drums, wastes, tanks or potentially contaminated soils are encountered during construction.

In the event contamination is detected during construction, the Department and Santa Rosa County should be notified, and the FDOT may need to address the problem through additional assessment and remediation activities. Reference should be made to the most recent FDOT specification entitled "Section 120 Excavation and Embankment -- Subarticle 120-1.2 Unidentified Areas of Contamination of the Standard Specifications for Road and Bridge Construction" in the project's construction contract documents that would require specific actions by the contractor in the event of any hazardous material or suspected contamination issue arises.

Depending on the findings of the Contamination Screening Evaluations and the proximity to known contaminated sites, projects involving "dewatering" should be discouraged or limited, since there is a potential to spread contamination to previously uncontaminated areas or less contaminated areas and affect contamination receptors, site workers and the public. Dewatering projects would require permits / approval from the Northwest Florida Water Management District.

Any land clearing or construction debris must be characterized for proper disposal. Potentially hazardous materials must be properly managed in accordance with Chapter 62-730, F.A.C. In addition, any solid wastes or other non-hazardous debris must be managed in accordance with Chapter 62-701, F.A.C. Petroleum cleanups must be managed in accordance with Chapter 62-770, F.A.C.

Please be advised that a new rule, 62-780, F.A.C., became effective on April 17, 2005. In addition, Chapters 62-770, 62-777, 62-782 and 62-785, F.A.C., were amended on April 17, 2005, to incorporate recent statutory changes. Depending on the findings of the environmental assessments, there are "off-property" notification responsibilities potentially associated with this project. These rules may be found at the following website: <http://www.dep.state.fl.us/waste/>

Based on our experience, the accurate identification, characterization and cleanup of sites requires experienced consulting personnel and laboratory support, management commitment of the project developers and their representatives, and will likely be very time-consuming. Early planning to address these issues is essential to meet construction and cleanup (if required) timeframes. Innovative technologies, such as special storm water management systems, engineering controls and institutional controls, such as conditions on water production wells and dewatering restrictions, may be required, depending on the results of environmental assessments.

Coordinator Feedback: None

2 Minimal assigned 01/27/2010 by Madolyn Dominy, US Environmental Protection Agency

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: Resources: Soils, groundwater, surface water which have the potential to be negatively affected by contaminated site features such as underground petroleum storage tanks, industrial/commercial facilities with onsite storage of hazardous materials, solid waste facilities, hazardous waste facilities, National Priority List (NPL) sites, etc.

Level of Importance: These resources are of a high level of importance in the State of Florida. However, a minimal degree of effect is being assigned for the proposed project Alternative 2 (ETDM #12597, SR 87 Connector).

Comments on Effects to Resources: EPA reviewed the following contaminated sites GIS analysis data for buffer distances of 100, 200, and 500 feet: Brownfield Location Boundaries, Geocoded Dry Cleaners, Geocoded Gasoline Stations, Geocoded Petroleum Tanks, Hazardous Waste Sites, National Priority List Sites, Nuclear Site Locations, Solid Waste Facilities, Superfund Hazardous Waste Sites, TANKS-NOV 2007, Toxic Release Inventory Sites, and USEPA RCRA Facilities.

Overall, for Alternative 2, there are very few contaminated sites features within proximity of the proposed alignment. The following features are listed in

the GIS analysis data at the programming screen phase of the project:

Brownfield Location Boundaries:

The Santa Rosa Brownfield Redevelopment Area is listed as being within proximity of the proposed roadway project. Brownfield projects are defined as abandoned, idled or under-utilized property where expansion or redevelopment is complicated by the presence or potential presence of environmental contamination. Previous thriving areas of economic activity are listed as Brownfield if the area is abandoned by contamination from past uses. Areas being unused or under-utilized are impediments to economic development in rural and urban communities. Redeveloped, these Brownfield areas can be catalysts for community revitalization. The Brownfield program brings together federal agencies to address cleanup and redevelopment in a more coordinated approach. Often times, federal grant programs and public/private organizations assist in the cleanup and redevelopment of Brownfield areas. The environmental review phase of the project should evaluate whether the classification of this area as a Brownfield Site will impact the roadway project.

Solid Waste Facilities:

G&D Tires, Inc (500-foot buffer distance)

No other contaminated sites features listed above were identified in the online EST GIS analysis data search.

Due to the fact that there are minimal to no contaminated sites features identified to be within the buffer boundaries, impacts to and/or from contaminated site features are expected to be minimal.

The environmental review (PD&E) phase of the project should include a survey of the area to confirm the location of current listed contaminated site features, along with other contaminated site features which may have been previously located in the area. If any contaminated sites features (e.g., petroleum storage tanks) are to be impacted or removed during the construction phase of the project, sampling and analysis should be conducted to determine if pollutants are present above regulatory levels. If high levels of pollutants are identified, remediation may be required prior to commencement of construction of the project.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Contaminated Sites issue for this alternative: Federal Highway Administration

Coordinator Summary: Farmlands Issue

2 *Minimal* assigned 03/30/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has reviewed the comments from the Natural Resources Conservation Service (NRCS) and recommends a Degree of Effect of Minimal.

The NRCS found that Alternative 2 impacts less than 1 acre of Prime Farmland at the 200 ft buffer width and nearly 8 acres at the 500 ft buffer width. Because the impact to Ag and Prime Farmland was determined to be minimal, the NRCS assigned a minimal impact rating for this Alternative.

No Comments were received from the Federal Highway Administration (FHWA)

ETAT Reviews: Farmlands Issue: 1 found

2 *Minimal* assigned 01/08/2010 by Rick Allen Robbins, Natural Resources Conservation Service

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: The USDA-NRCS considers soil map units with important soil properties for agricultural uses to be Prime Farmland. In addition, the USDA-NRCS considers any soils used in the production of commodity crops (such as, cotton, citrus, row crops, specialty crops, nuts, etc.) to possibly be considered as Unique Farmlands. Nationally, there has been a reduction in the overall amount of Prime and Unique Farmlands through conversion to non-farm uses. This trend has the possibility of impacting the nation's food supply and exporting capabilities.

Comments on Effects to Resources: Conducting GIS analysis of Prime Farmland (using USDA-NRCS data) and Important (Unique) Farmland Analysis (using 2004 NFWFMD data) has resulted in the determination that there are Prime Farmland soils at all buffer widths within the Project Area. Conducting GIS analysis of Prime Farmland (using USDA-NRCS data) and Important (Unique) Farmland Analysis (using 2004 NFWFMD data) has resulted in the determination that there are Prime Farmland soils at all buffer widths within the Project Area. Alternative #2 impacts less than 1 acre of Prime Farmland up to the 200 foot buffer width, and nearly 8 acres at the 500 foot buffer width. Impacts to Ag lands are primarily restricted to improved and unimproved pasture. Since the impact to Ag and Prime Farmland is minimal, we are assigning a minimal impact rating for this Alternative.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Farmlands issue for this alternative: Federal Highway Administration

Coordinator Summary: Floodplains Issue

4 *Substantial* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has reviewed the comments from the Northwest Florida Water Management District (NFWFMD) and the US Environmental Protection Agency (USEPA) and recommends a Degree of Effect of Substantial.

The NFWFMD's review found that approximately 180 acres of special flood hazard area are within the 500 foot buffer for this alignment. The flood prone areas are associated with Blackwater River and Clear Creek. In addition, approximately 109 acres are designated as storm surge zones under a Category 5 storm and Elevation ranges from approximately 0 to 182 feet NAVD 88.

The USEPA review of GIS analysis data (DFIRM 100-Year Floodplain and Special Flood Hazard Areas) indicates that all of the Alternatives (1 through 6) have approximately 20% of their acreage within the 100-year floodplain, as designated primarily by Zone AE of the flood hazard zone designation.

The FDOT acknowledges the comments from both agencies concerning the placement of a new roadway and how it will impact flow and possibly alter flood storage capacity. During the conceptual drainage analysis in the PD&E process, engineering design features and hydrological drainage structures will be proposed that will address stormwater transport, flow, and ensure discharge meets or exceeds flood control requirements. This analysis will ensure that the project will comply with the appropriate minimum FEMA floodplain management requirements for any changes in the floodplain elevations. This will include coordination on any appropriate studies and map revisions required by Title 44, Code of Federal Regulations.

FDOT understands the need for consultation, and coordination with appropriate flood management agencies will occur relating to regulatory requirements, avoidance, minimization and/or mitigation strategies. Hydrologic connectivity and integrity should be maintained and where impact avoidance is impossible and wetlands and streams must be crossed, extended elevated bridges should be employed to protect the integrity of stream corridors, hydrology, and floodplain functions.

No Comments were received from the Federal Highway Administration (FHWA).

ETAT Reviews: Floodplains Issue: 2 found

4 *Substantial* assigned 01/29/2010 by Leigh Brooks, Northwest Florida Water Management District

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: Approximately 180 acres of special flood hazard area are identified within the 500 foot buffer for this alignment. Flood prone areas are associated with Blackwater River and Clear Creek. Approximately 109 acres are designated as storm surge zones under a Category 5 storm. Elevation ranges from approximately 0 to 182 feet NAVD 88.

Comments on Effects to Resources: Floodplain function could be diminished with a new road, as water storage and flood attenuation potential will be impacted. Placement of roadway fill has the potential to impound waters and otherwise redirect flow, affecting floodplain, wetland, and riverine resources. Likewise, the use of culverts has the potential for altering stream channels and flow. Efforts should be made within the project area to protect floodplain resources and capacity and to prevent offsite flooding.

Proposed activities have the potential to diminish water quality, environmental resiliency, wetland and transitional habitat, and associated economic and environmental benefits provided by a fully functioning, intact floodplain.

Additional Comments (optional): Efforts should be made to protect floodplain resources and functions. Assurances should be provided that the project has complied with the appropriate minimum FEMA floodplain management requirements for any changes in the floodplain elevations. This includes appropriate studies and map revisions required by Title 44, Code of Federal Regulations.

Hydrologic connectivity and integrity should be maintained. Where impact avoidance is impossible and wetlands and streams must be crossed, extended elevated bridges should be employed to protect the integrity of stream corridors, hydrology, and floodplain functions.

Coordinator Feedback: None

3 *Moderate* assigned 01/28/2010 by Madolyn Dominy, US Environmental Protection Agency

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: Resources: Floodplains

Level of Importance: Development within the 100-year floodplain is of a high level of importance. Construction of roadways within the floodplain should not impede, obstruct or divert the flow of water or debris in the floodplain which would alter the roadway's discharge capacity or otherwise adversely affect public health, safety and welfare, or cause damage to public or private property in the event of a flood. A moderate degree of effect is being assigned for the proposed project (ETDM #12597, SR 87 Connector).

Comments on Effects to Resources: A review of GIS analysis data (DFIRM 100-Year Floodplain and Special Flood Hazard Areas) in the EST at the programming screen phase of the project indicates that all of the Alternatives (1 through 6) have approximately 20% of the acreage within the 100-year floodplain, as designated primarily by Zone AE of the flood hazard zone designation.

General comments relating to floodplains include the fact that any development within the 100-year floodplain has the potential for placing citizens and property at risk of flooding and producing changes in floodplain elevations and plan view extent. Development (such as roadways, housing developments, strip malls and other commercial facilities) within floodplains increases the potential for flooding by limiting flood storage capacity and exposing people and property to flood hazards. Development also reduces vegetated buffers that protect water quality and destroys important habitats for fish and wildlife. The area surrounding the proposed roadway project is expected to experience growth, and the SR 87 Connector would likely result in development which would have indirect and cumulative effects on floodplains in the SR 87 Connector corridor.

The PD&E phase of the project should include an evaluation of floodplain impacts. FDOT should consider alternatives to avoid adverse effects and incompatible development in the floodplains. Efforts should be made to avoid or minimize impacts to floodplain resources and functions. Engineering design features and hydrological drainage structures should be such that stormwater transport, flow, and discharge meet or exceed flood control requirements. Consultation and coordination with appropriate flood management agencies should occur relating to regulatory requirements, avoidance, minimization and/or mitigation strategies.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Floodplains issue for this alternative: FL Department of Environmental Protection, Federal Highway Administration

Coordinator Summary: Infrastructure Issue

1 *Enhanced* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) recommends a Degree of Effect of Enhanced for Infrastructure.

This Alternative provides for a much needed facility to more effectively distribute traffic throughout the area. One of the enhancements to the area infrastructure includes providing a new bridge crossing across the Blackwater River. It also provides a more direct connection between I-10 and the

Naval Air Station, Whiting Field. Alternative 2 also positively contributes to bicycle and pedestrian modes of travel by linking areas currently isolated.

No comments were received from the Federal Highway Administration (FHWA).

ETAT Reviews: Infrastructure Issue: None found

The following organization(s) were expected to but did not submit a review of the Infrastructure issue for this alternative: Federal Highway Administration

Coordinator Summary: Navigation Issue

2 *Minimal* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has reviewed the comments from the US Army Corps of Engineers (USACOE) and the US Coast Guard (USCG) and recommends a Degree of Effect of Minimal.

The FDOT acknowledges the USACOE comment that Blackwater River appears to be navigable and the bridge design should take into account the type of boat traffic traditionally on this waterway. In addition, FDOT also notes the USCG comment that crossing this waterway will need to be evaluated by the USCG to determine possible bridge permitting requirements.

No Comments were received from the Federal Highway Administration (FHWA).

ETAT Reviews: Navigation Issue: 2 found

2 *Minimal* assigned 12/24/2009 by Randy Turner, US Army Corps of Engineers

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: Blackwater River appears to be navigable water for recreational users. The river is one of the four river systems that drains the Pensacola Bay watershed and drains into the Blackwater Bay estuary. Impacts to navigation should be minimal.

Comments on Effects to Resources: The bridge design should take into account the type of boat traffic that traditionally uses the waterway. A taller and longer span design would also reduce impacts to the abutting wetland system.

Coordinator Feedback: None

2 *Minimal* assigned 12/18/2009 by Philip R Johnson, US Coast Guard

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information: N/A

Identified Resources and Level of Importance: This segment of the project does not appear to cross any major navigable waterways.

Comments on Effects to Resources: Segment 2 does not appear to have a substantial effect on major waterway crossings. However any crossing of waterways will need to be evaluated by the Coast Guard to determine possible bridge permitting requirements.

CLC Commitments and Recommendations: Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Navigation issue for this alternative: Federal Highway Administration

Coordinator Summary: Special Designations Issue

3 *Moderate* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has reviewed the comments from the US Environmental Protection Agency (USEPA) and recommends a Degree of Effect of Moderate.

USEPA's review of GIS data included finding the following Special Designation Sites within the proximity of Alternative 2: Brownfield Location Boundaries, Special Flood Hazard Areas, Florida Forever BOT Lands, Public Lands, Prime Farm Land, and Outstanding Florida Waters.

The USEPA assigned a Moderate degree of effect because of the inclusion of an Outstanding Florida Water in this list. The Blackwater River is listed as an Outstanding Florida Water (OFW) and as such, is provided the highest level of protection under the Florida Administrative Code (F.A.C.). Degradation of water quality in an OFW is prohibited except under certain circumstances. Pollutant discharges must not lower existing ambient water quality. Any activity within an OFW requiring a Florida Department of Environmental Protection (FDEP) Environmental Resource Permit (ERP) must be deemed to be clearly in the public interest. FDOT will coordinate and consult with FDEP about the specific permitting requirements relating to this OFW.

No Comments were received from the Federal Highway Administration (FHWA) or the FL Department of Agriculture and Consumer Services.

ETAT Reviews: Special Designations Issue: 1 found

3 *Moderate* assigned 01/29/2010 by Madolyn Dominy, US Environmental Protection Agency

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: Resources: Brownfield Location Boundaries, Florida Forever BOT Projects, Special Flood Hazard Areas, Public Lands (such as conservation easements, preserves, and conservation areas), Outstanding Florida Waters, Prime Farm Lands.

Level of Importance: These special designation features are of a high level of importance in the State of Florida. A moderate degree of effect is being assigned to this issue due to the fact that are special designation features, including an Outstanding Florida Water, within proximity of the proposed project.

Comments on Effects to Resources: A review of GIS analysis data at the programming screen phase of the project indicates that the following features identified as Special Designations are located within proximity of Alternative 2:

Brownfield Location Boundaries - See Comments under Contaminated Sites issue regarding Brownfield Redevelopment Areas.

Special Flood Hazard Areas - See Comments under Floodplains issue regarding potential floodplain impacts.

Florida Forever BOT Projects - See Comments under Recreation Areas issue regarding potential impacts to Florida Forever BOT Projects and sensitive recreational/natural resource areas.

Public Lands - See Comments under Recreation Areas issue regarding potential impacts to public lands and sensitive recreational/natural resource areas.

Prime Farm Land - There are three tracts of land within the 500-foot buffer distances (Kalmia, Johns, Dothan) that are designated Prime Farm Land. Prime farm land is a designation assigned by the US Department of Agriculture for land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oilseed crops and is also available for these uses. It has the soil quality, growing season, and moisture supply needed to produce economically sustained high yields of crops when treated and managed according to acceptable farming methods. Prime farmland in the U.S. has been prone to conversion when in proximity to urban growth areas. Having property designated as USDA prime farm land can help with growth management and resource conservation efforts. Zoning and conservation easements help to preserve prime farm land resources. FDOT should consult with appropriate regulatory agencies (e.g., NRCS) regarding potential impacts to prime farm land.

Outstanding Florida Waters - A review of GIS analysis data at the programming screen phase of the project indicates that the Blackwater River is within 100 feet of the proposed project. The Blackwater River is listed as an Outstanding Florida Water (OFW). OFWs are provided the highest level of protection under the Florida Administrative Code (F.A.C.). Degradation of water quality in an OFW is prohibited except under certain circumstances. Pollutant discharges must not lower existing ambient water quality. Any activity within an OFW requiring a Florida Department of Environmental Protection (FDEP) Environmental Resource Permit (ERP) must be deemed to be clearly in the public interest. FDOT should coordinate and consult with FDEP requiring specific permitting requirements relating to this OFW. Increased and/or future development in the corridor surrounding the project may also have indirect and cumulative impacts on the Blackwater River and its tributaries.

EPA is assigning a moderate degree of effect to this issue due to the fact that there are sensitive environmental and natural resource areas located directly adjacent to the project. Also, the possibility of increased future development in the area would have indirect and cumulative impacts on these types of resources.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Special Designations issue for this alternative: FL Department of Agriculture and Consumer Services, Federal Highway Administration

Coordinator Summary: Water Quality and Quantity Issue

4 Substantial assigned 05/12/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has reviewed the comments from the US Environmental Protection Agency (USEPA), the Florida Department of Environmental Protection (FDEP) and Northwest Florida Water Management District (NFWFMD) and recommends a Degree of Effect of Substantial.

FDOT acknowledges that protecting water resources such as surface water quality is a priority of federal and state environmental agencies. All agencies commented that every effort should be made to maximize the treatment of stormwater runoff, because area stormwater discharges to the Blackwater River and eventually to the Yellow River Marsh Aquatic Preserve, both designated Outstanding Florida Waters (OFW) under section 62-302.700(9), F.A.C., and afforded a high level of protection under sections 62-4.242(2) and 62-302.700, F.A.C. Pursuant to section 373.414(1), F.S., direct impacts to these waterbodies and associated wetlands must be demonstrated to be "clearly in the public interest" as part of the Environmental Resource Permitting (ERP) process. In addition, the permit applicant may be required to demonstrate that the proposed stormwater system meets the design and performance criteria established for the treatment and attenuation of discharges to OFWs, pursuant to Chapter 62-346, F.A.C., and the DEP and NFWFMD ERP Applicant's Handbook.

FDOT is also taking note of the USEPA and NFWFMD comments that the various Alternatives are located within proximity to water bodies that are impaired for various pollutants (coliforms and mercury). The PD&E study will include a review of water quality standards in water bodies listed on the Clean Water Act 303(d) list of impaired waters. The western end of the segment lies in a subwatershed of the Blackwater River which is verified impaired for coliforms and mercury. The GIS analysis indicated there were 5 wells within a 500 foot buffered polygon. The western end of the polygon lies in an area "vulnerable" to contamination of the Floridan Aquifer and the majority of the polygon shows as "more vulnerable" to contamination of the surficial aquifer, according to the Florida Aquifer Vulnerability Assessment. In addition, approximately 33 acres of the buffered polygon have a slope greater than 10 percent. This ranks as the highest of the six alternatives. Most of these areas are located on the southern bank of the Blackwater River floodplain and the west bank of Clear Creek, along which the roadway would traverse for about 1.5 miles. Steep slopes are susceptible to erosion initiated by ground disturbance

NFWFMD also added a comment that the Blackwater River and its receiving water, Blackwater Bay, are components of the larger Pensacola Bay Watershed and are Surface Water Improvement and Management (SWIM) priority waters of the NFWFMD. It should be noted that the river and floodplain corridor are priority for acquisitions for NFWFMD and the river is federally designated critical habitat for the Gulf sturgeon (*Acipenser oxyrinchus desotoi*). Also, NFWFMD expressed concern about impacts to Clear Creek or any disturbance of the escarpment west of the creek because it could subject this water body to water quality problems.

Considering the data provided as well as internal data and analysis, all of the proposed alternatives would have substantial impacts to water resources. According to the NFWFMD, the apparent least adverse impact would occur under Alternative 1, followed by Alternative 2. Alternatives 3, 4, 5 and 6 have greater wetland impacts, infringe on protected conservation lands, and have greater potential secondary and cumulative impacts. Alternative 3 has the greatest impact to floodplains, and Alternatives 4, 5 and 6 are more vulnerable to storm surges. Alternative 2 presents a concern due to alignment along a steeply sloped, erosion-prone valley wall and proximity to a stream.

FDOT will use appropriate storm water treatment systems, best management practices (BMPs), and land planning to prevent non point source pollution

as suggested by the NFWWMD.

No Comments were received from the Federal Highway Administration (FHWA).

ETAT Reviews: Water Quality and Quantity Issue: 3 found

4 *Substantial* assigned 01/31/2010 by Madolyn Dominy, US Environmental Protection Agency

Coordination Document: No Selection

Dispute Information:N/A

Identified Resources and Level of Importance: Resources: Water quality, surface water, groundwater

Level of Importance: These resources are of a high level of importance in the State of Florida. A substantial degree of effect is being assigned to this issue.

Comments on Effects to Resources: Protecting water resources such as surface water quality is a priority of federal and state environmental agencies. Primary sources of surface water quality impairment include point and non-point sources. A primary concern regarding water quality for the proposed project is the impact to surface water quality as a result of stormwater runoff into nearby surface water bodies. Stormwater runoff from the roadway would directly affect Blackwater River and other surface water bodies (such as Clear Creek). Blackwater River drains to Blackwater Bay and is part of the Pensacola Bay watershed.

Stormwater runoff from urban sources, including roadways, carries pollutants such as volatile organics, petroleum hydrocarbons, heavy metals, and pesticides/herbicides. Proper stormwater conveyance, containment, and treatment will be required in accordance with state and federal regulations and guidelines. A comprehensive evaluation of stormwater management issues in the project drainage basins (watershed) should be conducted. The construction of the SR 87 Connector could lead to increased growth, development, and population in this section of Santa Rosa County. Increased development leads to the increase of impervious surfaces (leading to stormwater runoff). Stormwater management issues become more critical to the reduction of pollution into surface waters.

The Blackwater River is listed as an Outstanding Florida Water (OFW). OFWs are provided the highest level of protection under the Florida Administrative Code (F.A.C.). Degradation of water quality in an OFW is prohibited except under certain circumstances. Pollutant discharges must not lower existing ambient water quality. Any activity within an OFW requiring a Florida Department of Environmental Protection (FDEP) Environmental Resource Permit (ERP) must be deemed to be clearly in the public interest. FDOT should coordinate and consult with FDEP requiring specific permitting requirements relating to this OFW. Increased and/or future development in the corridor surrounding the project may also have indirect and cumulative impacts on the Blackwater River and its tributaries.

Another issue of concern regarding water quality is the potential for the project to impact any private or public drinking water wells identified as being within the project area. A review of the presence of and/or location of drinking water wells should be identified. The project should avoid impact to any private or public potable drinking water wells or their source. Coordination with local and state drinking water agencies may be necessary.

The various Alternatives are located within proximity to water bodies that are impaired for various pollutants (fecal coliform and mercury). The PD&E study should include a review of water quality standards in water bodies listed on the Clean Water Act 303(d) list of impaired waters. It should also evaluate sources of water quality impairments and TMDL requirements and how these regulations and/or requirements may affect the proposed project and environmental resource permits. It is recommended that FDOT consult with the Florida Department of Environmental Protection water quality program on this issue.

The proposed SR 87 Connector will include a bridge crossing over the Blackwater River and possibly other water bodies. Construction activities such as construction of a new bridge structure would likely have direct, indirect, and cumulative impacts on these surface waters. Impacts should be evaluated and clearly documented in PD&E technical documents or reports. Various bridge construction alternatives and opportunities to avoid or minimize impacts to water quality should be evaluated and considered to the greatest extent practicable.

Due to the potential to have a significant impact on surface water bodies, the PD&E study should include an indepth review of surface water quality data, any water quality concerns in nearby surface waters and wetlands, and groundwater concerns and/or issues. FDOT should consult with FDEP and the Northwest Florida Water Management District on stormwater permitting issues and other water quality issues relating to point and nonpoint source discharges into surface water bodies.

Coordinator Feedback: None

3 *Moderate* assigned 01/29/2010 by Lauren P. Milligan, FL Department of Environmental Protection

Coordination Document: Permit Required

Dispute Information:N/A

Identified Resources and Level of Importance: Every effort should be made to maximize the treatment of stormwater runoff from the proposed highway connector project, as area stormwater discharges to the Blackwater River and eventually to the Yellow River Marsh Aquatic Preserve, both designated Outstanding Florida Waters (OFW) under section 62-302.700(9), F.A.C., and afforded a high level of protection under sections 62-4.242(2) and 62-302.700, F.A.C. Pursuant to section 373.414(1), F.S., direct impacts to these waterbodies and associated wetlands must be demonstrated to be "clearly in the public interest" as part of the Environmental Resource Permitting (ERP) process. We recommend that the PD&E study include an evaluation of existing area stormwater treatment adequacy and details on the future stormwater treatment facilities. The permit applicant may be required to demonstrate that the proposed stormwater system meets the design and performance criteria established for the treatment and attenuation of discharges to OFWs, pursuant to Chapter 62-346, F.A.C., and the DEP and NFWWMD ERP Applicant's Handbook.

Comments on Effects to Resources: Stormwater runoff from the road surface may alter adjacent wetlands and surface waters through increased pollutant loading. Natural resource impacts within and adjacent to the proposed highway right-of-way will likely include alteration of the existing surface water hydrology and natural drainage patterns, and reduction in flood attenuation capacity of area creeks, ditches, and sloughs as a result of increased impervious surface within the watershed. Stormwater treatment should be designed to maintain the natural pre-development hydroperiod and water quality, as well as to protect the natural functions of adjacent wetlands, floodplains, and waterbodies.

Coordinator Feedback: None

4 *Substantial* assigned 01/29/2010 by Leigh Brooks, Northwest Florida Water Management District

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information: N/A

Identified Resources and Level of Importance: Surface water - Stormwater runoff from this project would directly affect the Blackwater River and its extensive floodplain, Clear Creek and one unnamed intermittent stream. The Blackwater River and its receiving water Blackwater Bay are components of the larger Pensacola Bay Watershed and are Surface Water Improvement and Management (SWIM) priority waters of the NFWFMD. The District has identified the river and floodplain corridor as a priority for acquisition. The Blackwater River receives additional protection as an Outstanding Florida Water. The river is federally designated critical habitat for the Gulf sturgeon (*Acipenser oxyrinchus desotoi*).

Ground water - GIS analysis indicates 5 wells within a 500 foot buffered polygon. The western end of the polygon lies in an area "vulnerable" to contamination of the Floridan Aquifer and the majority of the polygon shows as "more vulnerable" to contamination of the surficial aquifer, according to the Florida Aquifer Vulnerability Assessment. The District has identified uplands at the southern terminus of the corridor for acquisition to protect groundwater recharge.

Slope - Approximately 33 acres of the buffered polygon have a slope greater than 10 percent. This ranks as the highest of the six alternatives. Most of these areas are located on the southern bank of the Blackwater River floodplain and the west bank of Clear Creek, along which the roadway would traverse for about 1.5 miles. Steep slopes are susceptible to erosion initiated by ground disturbance. In fact, LIDAR coverage shows that this area is already plagued with gully erosion from unpaved roads. Clear Creek appears to contain numerous seepage ravines and is therefore a sensitive resource.

Comments on Effects to Resources: Construction and long-term use of roadway facilities would generate non-point source pollution associated with stormwater runoff and would impact receiving water bodies and wetlands. Inadequate crossing of Clear Creek or disturbance of the escarpment west of the creek could subject this water body to water quality problems.

Assurances should be provided that stormwater management and treatment as well as erosion control of steep slopes will be sufficient to prevent long-term, cumulative degradation of water quality and aquatic habitat.

Additional Comments (optional): Considering the data provided as well as internal data and analysis, all of the proposed alternatives would have substantial impacts to water resources. The apparent least adverse impact would occur under Alternative 1, followed by Alternative 2. Alternatives 3, 4, 5 and 6 have greater wetland impacts, infringe on protected conservation lands, and have greater potential secondary and cumulative impacts. Alternative 3 has the greatest impact to floodplains, and Alternatives 4, 5 and 6 are more vulnerable to storm surges. Alternative 2 presents a concern due to alignment along a steeply sloped, erosion-prone valley wall and proximity to a stream.

Appropriate stormwater treatment systems, best management practices, and land planning must be employed to prevent nonpoint source pollution and other potential impacts. The crossing for Clear Creek needs to be more clearly described in order to assess potential impacts. Roadway design should incorporate extended elevated bridges spanning the full floodplain with no supports in the flow way to reduce impacts to wetlands, allow for hydrologic and habitat connectivity, and protect water quality.

Project work would require stormwater permitting in compliance with the Environmental Resource Permitting program, per Chapter 62-346, F.A.C.

Additional local permit requirements may apply as well.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Water Quality and Quantity issue for this alternative: Federal Highway Administration

Coordinator Summary: Wetlands Issue

4 Substantial assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has evaluated comments from the FL Department of Environmental Protection (FDEP), the US Environmental Protection Agency (USEPA), the Northwest Florida Water Management District (NFWFMD), US Fish and Wildlife, National Marine Fisheries Service and the US Army Corps of Engineers (ACOE) and recommends a Degree of Effect of Substantial.

The FDOT understands the importance of the wetlands in the project area and we will make every effort to prioritize the alternatives, as well as the final alignment within the selected alternative, utilizing agency comments in order to reduce to the extent practicable any adverse impacts. Many of the comments made about the project were similar for all of the above agencies. The FDOT understands the common concerns, as per the agencies requests, that must be included in the PD&E Study process to be the following:

1. The GIS review found wetlands within 100, 200, and 500 ft buffers of all alternatives. FDOT understands that all alternatives will have an impact to water resources that must be mitigated.
2. The project area encompasses a major river system, the Blackwater and Big Coldwater Creek, Clear Creek and Pond Creek Tributaries.
3. Permitting - An environmental resource permit will be necessary and will need to reflect efforts made to reduce impacts. In addition, the project may require a Section 404 wetland permit.
4. The Blackwater River - designated Special Outstanding Florida Waters and Surface Water Improvement and Management (SWIM) priority waters - flows into the Yellow River Marsh Aquatic Preserve and Class II shellfish harvesting waters. The designations thus reflected in Chapters 253, 258, 373, and 403, F.S., afford the highest level of state protection to the Blackwater River and the downstream estuarine system of Blackwater Bay and East Bay. Every effort should be made to minimize impacts to these areas.
5. Possible Direct Effects that should be reviewed include stream diversion, wetland fill, erosion, etc. Indirect effects include stormwater runoff, increased pollutants into surface waters and wetlands (water quality), etc.
6. The Blackwater River is included in Critical Habitat Unit 4 - the Yellow River System - for the federally threatened Gulf sturgeon.

Comments on Alternative 2 specifically were made by several agencies. The FLDEP stated that the EST indicated there are 163.1 acres of palustrine and 5.1 acres of riverine wetlands within the 500 ft buffer zone. FDOT will use this information during the PD&E study as a comparison to the other alternatives' impacts. The NFWFMD and USFWS further reviewed the NWI wetlands as well and stated that Alternative 2 has the LEAST wetland acreage impact of the six alternatives. Roughly 16 percent of this alternative is wetlands. They further added that the alternative lies in the Gulf Coastal Lowlands and Western Highlands physiographic provinces and the Southern Pine Plains and Hills ecoregion. The alternative goes through a wetland designated as critical habitat for the reticulated flatwoods salamander (*Ambystoma bishop*), a federally listed endangered species. A known historic breeding pond for the flatwoods salamander, vegetated with pond cypress and slash pine, is located on private property adjacent to Alternatives 1-3.

This pond and its associated uplands are designated as Critical Habitat Unit RFS-2, Subunit A (162 acres). FDOT also notes the comments include that White-top pitcherplant (*Sarracenia leucophylla*) and Curtiss' sandgrass (*Calamovilfa curtissii*), state-endangered and state-threatened wetland plants respectively, occur within 600 feet of the alternative, and there is potential for them to occur within the alternative. Threatened and Endangered Species reviews will be done as part of the PD&E Study.

Current land use according to 2004 FDEP Land Use and Land Cover is primarily upland and wetland mixed forest, forest regeneration areas, coniferous plantations, shrub and brushland, electrical power transmission lines, and mixed rangeland. Land cover is mostly wooded. The NFWFMD commented that Alternative 1, followed by Alternative 2 would have the apparent least adverse impacts. This alternative is tangent to an undeveloped public parcel encompassing a portion of Clear Creek managed as part of the Blackwater Heritage State Trail. Alternative 2 presents a concern due to alignment along a steeply sloped, erosion-prone valley wall and proximity to a stream.

The National Marine Fisheries Services (NMFS) also commented on Alternative 2. After a site inspection on January 12, 2010 to assess the potential concerns within Pensacola Bay, East Bay, Blackwater Bay, and the lower reaches of Blackwater River, NMFS found that it does not appear Alternative 2 will directly impact NMFS trust resources. However, FDOT understand stormwater treatment systems must be designed to prevent indirect impacts to Blackwater Bay, East Bay, and Pensacola Bay.

Finally the USACOE commented that the EST found that approximately 33.1 acres of NWI Palustrine wetlands and 0.7 acres of Blackwater River exist within the 100 ft buffer. They commented that Alternative 2 provides the second LEAST overall impacts to jurisdictional waters of the United States.

Finally, there were several similar recommendations that should be noted that will be included as part of the PD&E Study. They were:

1. Early interagency planning and coordination of wetland mitigation alternatives are required in accordance with Section 373.4137, Florida Statutes;
2. The design of bridges and culverts should be adjusted to minimize unavoidable impacts;
3. Stormwater treatment systems should be designed to prevent degraded water from reaching estuarine and marine habitats;
4. Mitigation measures should be implemented to replace the areal extent as well as the functions and values of the aquatic resources that would be impacted.

The FDOT is aware that suitable mitigation measures include wetland restoration or enhancement, culvert/bridge design measures to enhance fish and wildlife movement at crossings, stream restoration measures such as replacing riprap with biotechnical erosion controls, or restoring suitable meander geometry. In addition, land acquisition and mitigation opportunities proximate to the project impacts may be the best options to offset wetland functional losses.

A Wetlands Evaluation Report (WER) and Endangered Species Biological Assessment (ESBA) will be prepared as part of the PD&E Study. Coordination with the commenting agencies will occur throughout the PD&E Study.

No Comments were received from the Federal Highway Administration (FHWA).

ETAT Reviews: Wetlands Issue: 6 found

4 *Substantial* assigned 01/29/2010 by Lauren P. Milligan, FL Department of Environmental Protection

Coordination Document: Permit Required

Dispute Information:N/A

Identified Resources and Level of Importance: The proposed project area encompasses a major river system - the Blackwater River and Big Coldwater Creek, Clear Creek and Pond Creek tributaries - together with associated floodplains and wetland areas, and is hydrologically connected to Blackwater Bay, East Bay and Pensacola Bay in the Blackwater River and Pensacola Bay basins.

The EST indicates that there are 163.1 acres of palustrine and 5.1 acres of riverine wetlands within the 500-ft. buffer zone of the project.

Comments on Effects to Resources: The environmental resource permit applicant will be required to eliminate or reduce the proposed wetland resource impacts of highway connector construction to the greatest extent practicable:

- Minimization should emphasize avoidance-oriented corridor alignments, wetland fill reductions via pile bridging and steep/vertically retained side slopes, and median width reductions within safety limits.
- Wetlands should not be displaced by the installation of stormwater conveyance and treatment swales; compensatory treatment in adjacent uplands is the preferred alternative.
- After avoidance and minimization have been exhausted, mitigation must be proposed to offset the adverse impacts of the project to existing wetland functions and values. Significant attention is given to forested wetland systems and seagrass beds, which are difficult to mitigate.
- The cumulative impacts of concurrent and future road improvement projects in the vicinity of the subject project should also be addressed.

Additional Comments (optional): In general, DEP recommends that transportation improvements projects not infringe upon environmentally sensitive areas such as flood zones, rare or endangered species' habitats, wetlands, or natural drainage courses. Such lands should be preserved for their environmental and aesthetic significance. The Blackwater River - designated Special Outstanding Florida Waters and Surface Water Improvement and Management (SWIM) priority waters - flows into the Yellow River Marsh Aquatic Preserve and Class II shellfish harvesting waters. The designations thus reflected in Chapters 253, 258, 373, and 403, F.S., afford the highest level of state protection to the Blackwater River and the downstream estuarine system of Blackwater Bay and East Bay.

Coordinator Feedback: None

3 *Moderate* assigned 01/29/2010 by Madolyn Dominy, US Environmental Protection Agency

Coordination Document: No Selection

Dispute Information:N/A

Identified Resources and Level of Importance: Resources: Wetlands, wetlands habitat, water quality

Level of Importance: These resources are of a high level of importance in the State of Florida and within the project corridor(s). Wetlands provide for water quality enhancement, flood storage capacity, drainage, and wildlife habitat. Due to the potential to directly impact wetlands, EPA is assigning a moderate degree of effect to the wetlands issue for Alternatives 1 through 6.

Comments on Effects to Resources: A review of GIS analysis data (National Wetlands Inventory) in the EST for wetlands indicates that there are

wetlands present along the roadway corridor within the 100, 200, and 500 foot buffer distances for all Alternatives.

The project has the potential to impact wetland resources, including wetlands associated with Blackwater River and its associated tributaries. Development activities, including the construction of new roadways, have the potential to directly and/or indirectly affect wetlands, water quality, and aquatic habitats associated with clearing operations and construction of new stream or wetland crossings.

Any land clearing operations involving vegetation removal with mechanized equipment such as front-end loaders, backhoes, or bulldozers with shear blades, rakes or discs in wetlands; or windrowing of vegetation, land leveling; or other soil disturbances are considered placement of fill material in wetlands and would likely require a Section 404 wetland permit. Any unavoidable wetland impacts should preferably be mitigated within the same watershed to result in no net loss of aquatic functions.

Other issues of concern include increased stormwater runoff and the increase of pollutants into surface waters and wetlands as a result of the roadway and other point and nonpoint sources. Design and planning should ensure that stormwater runoff does not enter surface waters directly. This can include the use of enhanced swales, stormwater ponds, and sediment basins to capture and treat post-construction stormwater runoff to minimize impacts to important aquatic resources and wetlands. Every effort should be made to maximize the treatment of stormwater. Stormwater treatment areas/ponds should be designed to protect the function of surrounding wetlands, floodplains, and surface water features.

It is recommended that the environmental phase (PD&E) of the project include delineation of wetlands; functional analysis of wetlands to determine their value and function; an evaluation of stormwater pond sites to determine their impact on wetlands; a review of surface water crossings (such as bridges) to determine their impact on wetlands and floodplains; avoidance and minimization strategies for wetlands; and mitigation plans to compensate for adverse impacts.

Indirect and cumulative effects on wetlands should be evaluated to identify and quantify incremental and cumulative impacts on natural resources (wetlands) as a result of past, present, and reasonably foreseeable actions, including the proposed project and other land use actions.

Coordinator Feedback: None

4 Substantial assigned 01/29/2010 by Leigh Brooks, Northwest Florida Water Management District

Coordination Document: No Selection

Dispute Information:N/A

Identified Resources and Level of Importance: Analysis provided shows that within a 500-foot buffer there are 118 acres of wetlands as determined by FDEP 2004 Land Use and Land Cover data (identified by DOT as NWFWMW Wetlands 2004) and 168 acres of NWI wetlands, mostly palustrine with some riverine wetlands. Adding water to FDEP Wetlands 2004 to provide a more direct comparison with NWI acreage results in 125 acres of wetlands and water. Roughly 16 percent of the corridor is wetlands. Alternative 2 has the least wetland acreage impact of the six alternatives.

The corridor lies in the Gulf Coastal Lowlands and Western Highlands physiographic provinces and the Southern Pine Plains and Hills ecoregion. The corridor goes through a wetland designated as critical habitat for the reticulated flatwoods salamander (*Ambystoma bishop*), a federally listed endangered species. White-top pitcherplant (*Sarracenia leucophylla*) and Curtiss' sandgrass (*Calamovilfa curtissii*), state-endangered and state-threatened wetland plants respectively, occur within 600 feet of the corridor, and there is potential for them to occur within the corridor. Current land use according to 2004 FDEP Land Use and Land Cover is primarily upland and wetland mixed forest, forest regeneration areas, coniferous plantations, shrub and brushland, electrical power transmission lines, and mixed rangeland. Land cover is mostly wooded. This corridor is tangent to an undeveloped public parcel encompassing a portion of Clear Creek managed as part of the Blackwater Heritage State Trail.

Comments on Effects to Resources: New roadway construction would have direct impacts to environmentally sensitive wetlands. Potential indirect impacts include sedimentation, nonpoint source pollution, and hydrologic alternation. Impacts to riverine and palustrine habitats may be expected as a result of direct and indirect impacts.

Additional Comments (optional): Considering the data provided as well as internal data and analysis, all of the proposed alternatives would have substantial impacts to water resources. The apparent least adverse impact would occur under Alternative 1, followed by Alternative 2. Alternatives 3, 4, 5 and 6 have greater wetland impacts, infringe on protected conservation lands, and have greater potential secondary and cumulative impacts. Alternative 3 has the greatest impact to floodplains, and Alternatives 4, 5 and 6 are more vulnerable to storm surges. Alternative 2 presents a concern due to alignment along a steeply sloped, erosion-prone valley wall and proximity to a stream.

Early interagency planning and coordination of wetland mitigation alternatives are required in accordance with Section 373.4137, Florida Statutes.

Advance consultation and consensus between the District and FDOT are required.

Coordinator Feedback: None

4 Substantial assigned 01/22/2010 by Mary Mittiga, US Fish and Wildlife Service

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information:N/A

Identified Resources and Level of Importance: Water resources within the proposed corridor include the Blackwater River, its floodplain, and potentially high quality wetland communities. The Blackwater River is designated as an Outstanding Florida Water and is included in Critical Habitat Unit 4 - the Yellow River System - for the federally threatened Gulf sturgeon. The Blackwater River drains to Blackwater Bay, part of the Yellow River Marsh Aquatic Preserve. Wetlands may include areas of cypress/gum swamp, pitcher plant prairie, and wet pine flatwoods. A known historic breeding pond for the endangered reticulated flatwoods salamander (*Ambystoma bishopi*) vegetated with pond cypress and slash pine is located on private property adjacent to Corridors 1-3. This pond and its associated uplands are designated as Critical Habitat Unit RFS-2, Subunit A (162 acres).

Comments on Effects to Resources: The Blackwater River, its tributaries, floodplain, and associated wetlands provide habitat for a large number of fish and wildlife species including federally protected species. The Service recommends implementing measures to protect fish and wildlife resources from potential impacts resulting from the proposed project. Direct impacts may include, but are not limited to, stream diversion or culverting, wetland fill, erosion, siltation, and loss of shoreline vegetation. Indirect impacts may include introduction of exotic species adapted to colonizing disturbed areas, fragmentation of contiguous habitats, altered hydrology, increases in stormwater discharge, altered patterns of sediment erosion and deposition, increased impervious surface area, and additional disturbance in newly opened areas.

Impacts to wetlands and waterbodies can be minimized in a number of ways. Avoidance is often the most effective measure to reduce impacts; it can be accomplished either by locating the route to circumvent the most valuable resources or by reducing the project footprint. Unavoidable impacts can be minimized by adjusting the design of bridges or culverts. The Service recommends using fluvial geomorphology analyses to design crossing

structures that permit normal bedload movement, a low flow channel to allow fish passage and preserve water quality, and additional culverts installed above bankfull level to maintain the hydrologic regime of floodplain areas. These measures may also result in a reduction of blowout events and maintenance requirements. Measures should be implemented to minimize any hydrologic alteration to surrounding wetlands, especially to habitat used by the flatwoods salamander. Information should be provided on Best Management Practices (BMPs) to prevent degradation of aquatic resources from erosion, siltation, and nutrient discharges associated with the project site. Specialized measures may be required to prevent inadvertent impacts to high quality wetlands and designated critical habitat units.

After all efforts have been taken to avoid and minimize impacts to wetlands and other waters of the United States, mitigation measures should be implemented to replace the areal extent as well as the functions and values of the aquatic resources that would be impacted. Suitable mitigation measures include wetland restoration or enhancement, culvert/bridge design measures to enhance fish and wildlife movement at crossings, stream restoration measures such as replacing riprap with biotechnical erosion controls, or restoring suitable meander geometry. Land acquisition and mitigation opportunities proximate to the project impacts may be the best options to offset wetland functional losses.

Coordinator Feedback: None

2 *Minimal* assigned 01/15/2010 by David A. Rydene, National Marine Fisheries Service

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: Pensacola Bay, East Bay, Blackwater Bay and the lower reaches of the Blackwater River. These systems contain estuarine and marine habitats used by federally-managed fish species and their prey.

Comments on Effects to Resources: Alternative 2 - NMFS staff conducted a site inspection of the project area on January 12, 2010, to assess potential concerns to living marine resources within Pensacola Bay, East Bay, Blackwater Bay, and the lower reaches of the Blackwater River. The lands adjacent to the proposed alignment appear to be mostly forested palustrine wetlands. It does not appear that Alternative 2 will directly impact NMFS trust resources. However, the road would cross both the Blackwater River (just northeast of Cooper Basin) and Clear Creek, both of which drain to Blackwater Bay, East Bay, and Pensacola Bay. Therefore, the project may result in indirect impacts to downstream NMFS trust resources. Use of the road could result in an increase in the amount of sediment, oil and grease, metals, and other pollutants reaching estuarine habitats utilized by marine fishery resources. Therefore, NMFS recommends that stormwater treatment systems be designed to prevent degraded water from reaching estuarine and marine habitats. Best management practices should be employed during road construction to prevent siltation of downstream estuarine habitats. Additionally, the manner in which the road may affect drainage within the watershed and hydrologic functions should be considered.

Coordinator Feedback: None

3 *Moderate* assigned 12/24/2009 by Randy Turner, US Army Corps of Engineers

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: A review of GIS data provided in the screening tool indicates approximately 33.1 acres of NWI Palustrine wetlands and 0.7 acres of the Blackwater River exist within the 100-foot buffer. The wetlands appear to be high quality. The subject wetlands play a vital role for flood storage, water quality issues, and drainage for the surrounding areas. A functional analysis would determine the extent of their value.

Comments on Effects to Resources: Alternative 2 provides the second least overall impacts to jurisdictional waters of the United States and is more favorable to the purpose and need of the project and the geographical areas the corridor is intended to service than any of the other alternatives. Direct impacts would include the elimination of functions and values of the wetlands within the roadway footprint, any disturbed buffer, and create secondary effects along adjacent waters/buffer.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Wetlands issue for this alternative: Federal Highway Administration

Coordinator Summary: Wildlife and Habitat Issue

4 *Substantial* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has evaluated comments from the Naval Air Station Whiting Field, US Fish and Wildlife and the FL Fish and Wildlife Conservation Commission and recommends a Degree of Effect of Substantial.

FDOT understands the Naval Air Station's (Whiting Field) concern over the potential for increased bird animal strike hazard for Alternative 2 because NASWF aircraft fly entry and exit routes along the SR 87/89 Corridor. If this Alternative is chosen, it is understood mitigation strategies may need to be taken like minimizing stormwater retention to 48 hours, bird monitoring, and/or mowing schedules updates to reduce bird animal strike hazards.

The US Fish and Wildlife Service commented that all six alternatives cross critical habitat for the threatened Gulf Sturgeon (*Acipenser oxyrinchus desotoi*). Alternatives 1-3 cross 0.9 miles upstream of Cooper Basin, an area where fish congregate while Alternatives 4-6 cross the Blackwater River south of Milton, where fish are not known to congregate. Also, Alternatives 1-3 may impact flatwoods salamander habitat while all alternatives cross waters that are accessible to the federally endangered West Indian manatee (*manatus latirostris*). In addition, there is potential for the endangered red-cockaded woodpecker (RCW) (*Picoides borealis*) to occur along the proposed roadway where suitable habitat is present. The Department understands the importance of protecting the above species and their habitat. We have taken note of the proposed impact minimization techniques the US Fish and Wildlife Service listed in their comments. These include measures to protect the Gulf Sturgeon, including limiting in-water work activities when Gulf Sturgeon are present to the extent practicable, as well as using appropriate Standard Manatee Construction Conditions if they are found to be in the project area. In addition, the assessment of critical habitat for the flatwoods salamander and the RCW will be completed as suggested in the comments. Finally, the Department understands that new roadways may affect migrating animals and potentially costly measures such as designing bridges to span riverine floodplains and preserving wide riparian buffers should be reviewed and considered when prioritizing the alternatives.

The Florida Fish and Wildlife Conservation Commission (FWC) completed a 500 ft GIS analysis of the 6 Alternatives within the 4 corridors. The results of the analysis indicated that all six Alternative Corridors can be considered moderately to mostly rural in nature, as High and Low Impact Urban Lands vary from a low of only 79.0 acres for Alignment 3 to a high of 208.2 acres along Alignment 6. Wetlands along the Alignments vary from a low of 143.1 acres for Alignment 2, to a high of 256.3 acres for Alignment 6. Upland forests range from a low of 318.3 acres for Alignment 5 to a high of 763.8 acres along Alignment 3. The wetlands are predominately characterized by freshwater marsh, cypress swamp, bay swamp, hardwood swamp, mixed wetland

forest, and open water, while uplands are represented by upland hardwood forest, mixed hardwood-pine forests, pinelands, longleaf pine-turkey oak sandhills, and shrub and brushland. Based on known range and preferred habitat type, the following species listed by FWC as Endangered (E), Threatened (T), or Species of Special Concern (SSC) may occur and be impacted: gopher tortoise (T), Eastern indigo snake (T), Florida pine snake (SSC), gopher frog (SSC), pine barrens treefrog (SSC), snowy egret (SSC), little blue heron (SSC), tricolored heron (SSC), white ibis (SSC), wood stork (E), Southeastern American kestrel (T), red-cockaded woodpecker (SSC), Gulf sturgeon (SSC), blackmouth shiner (E), and possibly the eastern chipmunk (SSC) and Florida black bear (T). In addition, we understand FWCs concern that all six Alternatives could adversely impact good to high quality upland and wetland habitat as indicated by scores of 6 to 7 or 6 to 8 (10 = high, 0 = Low) on FWC's Integrated Wildlife Habitat Ranking System map. We will investigate the location of Priority Wetlands and Biodiversity Hotspots as outlined by FWC utilizing the FWC GIS Shapefiles to ensure minimal impact while offering the public a safe new transportation corridor. Priority Wetlands for Wetland Dependent Listed Species are capable of supporting 1 to 3 focal species in uplands, and 1 to 3 focal species in wetlands. In addition, high quality areas of upland and wetland habitat that have been designated by FWC as Biodiversity Hotspots can support 3 to 4, 5 to 6, and 6 to 7 or more focal species; and are within regional areas officially designated as consultation areas for the listed Gulf Sturgeon, and the red-cockaded woodpecker. In addition, FDOT's environmental research will include habitat location assessments for the other species FWC notes in their comments as species of conservation need: eastern cottontail rabbit, northern red-headed woodpecker, hairy woodpecker, bobwhite, southeastern fox squirrel, spotted skunk, striped skunk, southern hognose snake, alligator snapping turtle, Gulf coast box turtle, Escambia map turtle, Gulf coast smooth softshell turtle, carpenter frog, Florida bog frog, seal salamander, bald eagle, peregrine falcon, loggerhead shrike, brown headed nuthatch, ironcolor shiner, speckled darter, and southern starhead topminnow. Another comment made by FWC was concern that all of the alternatives have the potential to impact the Blackwater River Heritage State Trail, the Coldwater Creek Preserve, the Blackwater River State Forest, the Black Water River Water Management Area, and the lands of the Naval Air Station at Whiting Field. With the exception of the Heritage Trail, we believe that we may be able to avoid these properties utilizing FWCs GIS shapefiles and Santa Rosa County's Parcel data to locate them. In addition, the Heritage Trail, if impacted, will be incorporated into the roadway cross section to ensure its location is not dramatically shifted from its existing position along the historic railroad alignment. Finally, we understand and will consider the comment that Alternatives 2 and 3 will diminish the conservation value of the proposed acquisition lands for the Clear Creek/Whiting Field Florida Forever Project and may facilitate growth in proximity to the Naval Air Station, impacting fish and wildlife habitat and reducing their land manager's ability to use prescribed burning to enhance conservation lands during our Alternative Corridor selection process.

In addition, we will review the following Best Management Practices (BMPs) during this PD&E Study listed by FWC as we determine which Alternative will effectively provide a new transportation corridor, while causing the least amount of negative environmental and social impacts. The BMPs include the review of the existing corridor for potential improvements to minimize impacts, development of a vegetative cover map to be used to mitigate habitat loss, assurance that mitigation sites are in the same regional area, coordination with FWC on listed species surveys, inclusion of design options that include spanning streambeds and wetland floodplain areas where possible, and inclusion of drainage design options to reduce the need for offsite Drainage Retention Areas.

No Comments were received from the Federal Highway Administration (FHWA) or the US Forest Service.

ETAT Reviews: Wildlife and Habitat Issue: 3 found

2 *Minimal* assigned 02/14/2010 by Randy Roy, Naval Air Station Whiting Field

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information: N/A

Identified Resources and Level of Importance: Alternative 2 may have minimal to moderate impact on Naval Air Station Whiting Field's mission.

Comments on Effects to Resources: Potential for increased Bird Animal Strike Hazards. Retention pond development to support project alternatives - Possible measures/mitigation strategies to consider would be to minimize storm water retention to 48-hours, provide active bird monitoring, and implement mowing schedules (Bird Animal Strike Hazard concerns). NASWF mission aircraft routinely fly entry and exit routes along/adjacent the 87/89 corridor.

Coordinator Feedback: None

4 *Substantial* assigned 01/22/2010 by Mary Mittiga, US Fish and Wildlife Service

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information: N/A

Identified Resources and Level of Importance: Federally Protected Species

Federally listed threatened and endangered species may occur along the proposed alignment. All six corridors cross critical habitat for the threatened Gulf sturgeon (*Acipenser oxyrinchus desotoi*). The Blackwater River from its confluence with Big Coldwater Creek downstream to its discharge into Blackwater Bay is included within Critical Habitat Unit 4 - the Yellow River System. Corridors 1-3 cross the Blackwater River approximately 0.9 mile upstream of Cooper Basin, an area where numerous fish congregate for summer resting and staging. Sturgeon occurrence drops significantly upstream of Cooper Basin at the proposed crossing. Corridors 4-6 cross the Blackwater River just south of Milton. While fish migrate through this area, it is not a known major congregation site.

Corridors 1, 2, and 3 may impact Critical Habitat Unit RFS-2, subunit A, for the endangered reticulated flatwoods salamander. Threats to this unit from the proposed corridor include potential urban development, potential hydrologic alterations to the habitat, and the potential for fire suppression.

The proposed project includes work in waters accessible to the federally endangered West Indian manatee (*Trichechus manatus latirostris*), an occasional, warm month visitor to the panhandle.

There is potential for the endangered red-cockaded woodpecker (RCW) (*Picoides borealis*) to occur along the proposed roadway where suitable habitat is present.

Other Fish and Wildlife Resources

The Blackwater River, its tributaries, floodplain, and associated wetlands provide habitat for a large number of fish and wildlife species. Much of the Blackwater River floodplain ranks as Priority 1 (highest) and 2 conservation areas for rare species using the Florida Natural Areas Inventory (FNAI) Habitat Conservation Priorities Geographic Information System data layer. Corridors 2 and 3 will cross proposed acquisition lands for the Clear Creek/Whiting Field Florida Forever project. Corridor 3 will cross the Phase I project between Whiting Field Naval Air Station and a 1,400-acre block of conservation lands to the northeast acquired under Florida Forever in 2009. Corridor 2 will cross proposed acquisition lands for Phase II of the project to the southwest of Whiting Field. The purpose of these conservation lands is to create a conservation land buffer to the Naval Air Station, protect

surrounding water bodies, and allow for expanded recreation opportunities for the State of Florida.

Comments on Effects to Resources: Federally Protected Species

A complete description and map of Critical Habitat Unit 4 are given in the Designation of Critical Habitat for the Gulf Sturgeon Final Rule available on the internet at <http://alabama.fws.gov/gsf/>. Measures to protect the Gulf sturgeon should be incorporated in your project plans, and should include construction constraints to avoid and minimize effects to the sturgeon, their riverine habitat, and the primary constituent elements (PCEs) of sturgeon critical habitat essential to their conservation. In-water work activities should be avoided to the extent practicable during periods when Gulf sturgeon are present in their riverine habitat.

Measures to avoid and minimize impacts to reticulated flatwoods salamander critical habitat should be included in your project plans. Affects to the PCEs of critical habitat should be specifically assessed. Information on PCEs is available in the Designation of Critical Habitat for Frosted Flatwoods Salamander and Reticulated Flatwoods Salamander Final Rule at: <http://www.fws.gov/panamacity/species/pdf/FlatwoodsSalamander.pdf>. Your review should address direct, secondary, and cumulative effects to both the wetland and upland components of critical habitat. Examples of indirect effects include hydrologic alteration, reduced ability to manage property by prescribed burning, spread of exotic nuisance species, and roadkill.

We recommend including appropriate Standard Manatee Construction Conditions for your project to provide protection measures for the manatee.

For the RCW, if work impacts pine stands 30 years of age the stand should be surveyed for RCW. No other records for federally listed species were identified with the FNAI database. However, we assume that listed species occur in suitable ecological communities. Site surveys should be made to determine the presence or absence of listed species whenever suitable habitat is present.

Other Fish and Wildlife Resources

During this early phase of project development, the Service recommends implementing measures to protect fish and wildlife resources from potential impacts resulting from the proposed project. Corridors 2 and 3 will diminish the conservation value of the proposed acquisition lands for the Clear Creek/Whiting Field Florida Forever Project. Corridors 2 and 3 may facilitate growth in proximity to the Naval Air Station, impacting fish and wildlife habitat and reducing their land manager's ability to use prescribed burning to enhance conservation lands.

All the new corridors will result in further fragmentation of the regional landscape. Increasing fragmentation is correlated with isolated, less stable wildlife populations, particularly for small mammals. Roads form a barrier for taxa that are sensitive to surface microclimate changes (temperature, moisture, chemistry), and may detrimentally affect groups such as reptiles and amphibians which migrate annually to breeding sites. The Florida black bear and other wide-ranging species are especially vulnerable to roadkill because of frequent road crossing. Some measures which help maintain habitat linkage include designing bridges to span the riverine floodplain, preserving wide riparian buffers, and/or adding multi-species wildlife. These costs should also be incorporated in the project's cost-benefit analysis.

Degradation of adjacent habitat is a secondary effect of the proposed roadway, especially for migratory birds. Many migratory bird species prefer "deep woods" and require land tracts with low edge:area ratios. Increasing fragmentation results in smaller islands of habitat, favoring species adaptable to woodland edges. Mitigation costs for secondary effects in these habitats should be considered.

Coordinator Feedback: None

4 *Substantial* assigned 01/19/2010 by Scott Sanders, FL Fish and Wildlife Conservation Commission

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information: N/A

Identified Resources and Level of Importance: The Habitat Conservation Scientific Services Section of the Florida Fish and Wildlife Conservation Commission (FWC) has coordinated an agency review of ETDM #12597, Santa Rosa County, and provides the following comments related to potential effects to fish and wildlife resources on this Programming Phase project.

The Project Description Summary states that this project involves a Project Development and Environment (PD&E) Study to evaluate the potential for providing a new roadway corridor to serve as the missing link or bypass for connecting SR-87 South and SR-87 North as an Alternative to the existing shared facility of SR-87 South to SR-87 North via US-90, a portion of which runs through the Town of Milton, and is currently operating at a failing Level of Service (LOS F). According to information provided by the Florida Department of Transportation's (FDOT's) consultant, the No-build Alternative, and the Transportation System Alternative that involves improvements to intersections for traffic flow and safety and other measures along the existing Alignment will necessarily involve work in the downtown Historic District of Milton where Right-of-way expansion is problematic. However, since the existing SR-87 Alignment was not provided on the Environmental Screening Tool as one of the project options, we are unable to provide an assessment and comparison of fish and wildlife resource and habitat impacts together with the following four new corridors and six Alternative Alignments that have been identified for evaluation for improved mobility and safety on the project in the PD&E Study:

1. Corridor 1 (Alternative 1) extends from the existing intersection of US-90 and SR-87 South crossing the Blackwater River near the existing eastern power line easement; then continues to follow the power easement and connects to SR-87 North near the southern split of SR-87 North and SR-89, for a total length of about 6.5 miles.
2. Corridor 2 (Alternative 2) also runs to the north from the US-90 and SR-87 South intersection and crosses the Blackwater River near the easternmost power line crossing easement, and then runs just to the north of Corridor 1 adjacent to the Clear Water Creek environmental lands. This proposed route of about 7.2 miles then runs west to connect to SR-87 North near the northern split of SR-87 North and SR-89.
3. Corridor 3 (Alternative 3), which is about 10.5 miles in length, also runs to the north from the US-90 and SR-87 South intersection and crosses the Blackwater River near the easternmost power line crossing easement, then extends north on the east side of Whiting Field, possibly using portions of the Pat Brown Road Right-of-way (ROW). North of Whiting Field, the corridor will attempt to pass through a narrow gap between the Nature Conservancy and Florida Forever Lands, and Whiting Field, at a location where it can intersect SR-87 North, south of Southridge Road and north of Whiting Field.
4. Corridor 4 (Alternatives 4, 5, & 6) will evaluate areas to the south of US-90, which will involve a new crossing of the Blackwater River between Bagdad and Milton. The southern corridor will generally head west from SR-87 South, sharing a portion of US-90 ROW that will be expanded, and connect to SR-87 North at the intersection of US-90 and SR-87 North. The western end of this corridor near SR-87 North will utilize the ROW of the Blackwater Heritage Trail, and incorporate the trail in the roadway cross section. This corridor is approximately 5.6 to 6.5 miles long.

A GIS analysis within 500 feet of each of the six Alternative Alignments 1, 2, 3, 4, 5, and 6 within Corridors 1, 2, 3, and 4 was accomplished; and Table 1 provides the acreage of native upland forests and forested and herbaceous wetland plant community types, along with man-altered land use types that include Agricultural lands and High and Low Impact Urban lands. The results of our analysis indicates that all six Alternative Alignments can be considered moderately to mostly rural in nature, as High and Low Impact Urban Lands vary from a low of only 79.0 acres for Alignment 3 to a high of 208.2 acres along Alignment 6. Wetlands along the Alignments vary from a low of 143.1 acres for Alignment 2, to a high of 256.3 acres for Alignment 6. Upland forests range from a low of 318.3 acres for Alignment 5 to a high of 763.8 acres along Alignment 3.

According to our assessment of all six Alternatives, wetlands are predominately characterized by freshwater marsh, cypress swamp, bay swamp, hardwood swamp, mixed wetland forest, and open water, while uplands are represented by upland hardwood forest, mixed hardwood-pine forests, pinelands, longleaf pine-turkey oak sandhills, and shrub and brushland. Man-altered land use types include High and Low Impact Urban lands, and Agricultural lands. Based on known range and preferred habitat type, the following species listed by our agency as Endangered (E), Threatened (T), or Species of Special Concern (SSC) may occur and be impacted directly by loss or degradation of habitat within the project area Right-of-way (ROW), or indirectly due to associated residential or commercial development within the adjacent regional area: gopher tortoise (T), Eastern indigo snake (T), Florida pine snake (SSC), gopher frog (SSC), pine barrens treefrog (SSC), snowy egret (SSC), little blue heron (SSC), tricolored heron (SSC), white ibis (SSC), wood stork (E), Southeastern American kestrel (T), red-cockaded woodpecker (SSC), Gulf sturgeon (SSC), blackmouth shiner (E), and possibly the eastern chipmunk (SSC) and Florida black bear (T).

The following wildlife species that may occur in and adjacent to the project area, while not officially listed, are considered by our agency as species of greatest conservation need due to long-term and chronic habitat loss: eastern cottontail rabbit, northern red-headed woodpecker, hairy woodpecker, bobwhite, southeastern fox squirrel, spotted skunk, striped skunk, southern hognose snake, alligator snapping turtle, Gulf coast box turtle, Escambia map turtle, Gulf coast smooth softshell turtle, carpenter frog, Florida bog frog, seal salamander, bald eagle, peregrine falcon, loggerhead shrike, brown headed nuthatch, ironcolor shiner, speckled darter, and southern starhead topminnow.

Furthermore, our analysis included an overall accounting, provided in Table 2, which includes a comparison of the potential for impacts or possible adverse interaction for all six Alternative Alignments with important and sensitive ecological features in the regional study area. Overall, our screening shows that all new Alignments have the potential for at least moderately high to substantial adverse effects on fish and wildlife and habitat resources. First, based on the information provided in the project description, all new Alignments would require construction of a new bridge across the Blackwater River and floodplain. Second, all six Alignments could adversely impact good to high quality upland and wetland habitat as indicated by scores of 6 to 7 or 6 to 8 (10 = high, 0 = Low) on FWC's Integrated Wildlife Habitat Ranking System map; impact areas designated by our agency as Priority Wetlands for Wetland Dependent Listed Species, which are capable of supporting 1 to 3 focal species in uplands, and 1 to 3 focal species in wetlands; impact high quality areas of upland and wetland habitat that have been designated by FWC as Biodiversity Hotspots that can support 3 to 4, 5 to 6, and 6 to 7 or more focal species; and are within regional areas officially designated as consultation areas for the listed Gulf sturgeon, and the red-cockaded woodpecker. Furthermore, all Alignments could impact the Blackwater and Yellow Rivers and other streams which support listed and rare fish species, while some of these Alignments could in addition adversely affect Clear Creek and Pond Creek. Finally, all Alignments could impact the Blackwater River Heritage State Trail, while other Alignments in varying degrees could adversely impact the Coldwater Creek Preserve, Blackwater River State Forest, Black Water River Water Management Area, and the lands of the Naval Air Station at Whiting Field.

Comments on Effects to Resources: Direct effects of the project could be substantial for all Alignments. Our analysis shows that all new Alignments have the potential for the direct loss of high quality and productive upland, wetland, and riverine habitat and will, to some degree, adversely impact public conservation lands by clearing within the ROW footprint, interchanges, and the construction of Drainage Retention Areas (DRAs).

Indirect effects could also be substantial since these new Alignments would cause detrimental habitat fragmentation and isolation of wetland and upland habitat; and result in impacts to a moderate number of listed species by decreased habitat connectivity and increased mortality through roadkills. Increased stormwater runoff could also degrade aquatic and wetland habitat by reduced water quality and through increased turbidity. Long-term Impacts from increased commercial and residential development could be encouraged and facilitated by the project and naturally follow the new roadway, causing significant loss and degradation of habitat, as could the construction of new secondary roads to connect with the new bypass. Public lands could be indirectly impacted by increased noise, artificial lighting, and possibly the reduced ability to perform prescribed burning necessary to maintain appropriate habitat conditions because of liability and concern for public safety due to smoke drift to the new roadway.

Additional Comments (optional): The following recommendations and Best Management Practices (BMPs) are offered for consideration in future planning efforts so that adequate funding can be justified for the PD&E study to design the project in a manner to avoid, minimize, or mitigate project effects to wildlife species and their habitat:

1. The Project Description defines the No-Build Alternative and the Transportation System Management (TSM) Alternative along the existing alignment, in addition to the new Bypass Alternatives, as viable parts of the total project to be addressed in the PD&E Study. The TSM Alternative along the existing Alignment appears to have potential for the least impacts to fish and wildlife and habitat resources. If improvement of the existing Alignment is found not to be a viable option after further study, we recommend a concerted effort during the PD&E Study Phase to avoid, minimize or properly mitigate impacts to the fish and wildlife and habitat resources we have detailed in our assessment above.

2. A vegetative cover map and accounting by acreage for each plant community type should be made for the affected project area. Compensatory mitigation for all upland and wetland habitat loss should be accomplished. If wetlands are mitigated under the provisions of Chapter 373.4137 F.S., the proposed mitigation sites should be located within the immediate or same regional area; be functionally equivalent; equal to or of higher functional value; and as or more productive as the impacted wetlands. Land acquisition and restoration of appropriate tracts adjacent to existing public lands, or other tracts placed under conservation easement or located adjacent to large areas of jurisdictional wetlands that currently serve as regional core habitat areas, would be supported by our agency. An important focus of the selection process for mitigation lands for this project should include a strong consideration of, and habitat replacement for the listed and non-listed birds, mammals, amphibians, reptiles, and fish that are discussed above as potentially occurring in the project area.

3. Surveys for listed species should be accomplished within and adjacent to the ROW of all Alignments and proposed sites for DRAs. The methodology for these surveys should be coordinated with FWC early in the PD&E Study and follow appropriate survey techniques or guidelines to determine presence, absence, or probability of occurrence of various species, and to assess habitat quality. These study methods should be designed considering the potential listed species discussed above. Please note that some species are known to use atypical habitat types and transitional habitat areas; therefore, due diligence and thorough coverage during field investigations are key to adequately determining presence or absence of all species. Based on the survey results, a plan should be developed to address direct, indirect, and cumulative effects of the project on wildlife and habitat resources, including listed species, and other important species we have included above. Avoidance, minimization, and mitigation measures should also be

formulated and implemented. Permits may be needed from the FWC for impacts to the gopher tortoise, and possibly other listed species; and due diligence and coordination with FWC is recommended.

4. We strongly recommend that all new bridges over streams, and in particular the Blackwater River, be constructed to span completely the streambed and wetland floodplain along with the upland transitional area. We also recommend that FDOT develop and implement customized BMPs especially formulated for this project as they pertain to dredging and filling, control of siltation and turbidity, and the nutrient loading associated with discharge of roadside runoff, to reduce effects within freshwater basin wetlands and riparian systems. The PD&E Study should address the potential for treating roadside runoff within the median and roadside swales to reduce the need for offsite Drainage Retention Areas and avoid habitat loss. Appropriately designed fencing should also be erected within rural habitat areas to reduce roadkills, and improve public safety. The design of this fence should include smaller mesh at ground level to preclude access onto the roadway by various mammals, amphibians and reptiles. Our biologists are available to provide input on appropriate fence design.

5. Construction equipment staging areas; storage of oils, greases, and fuel; fill and roadbed material; and equipment maintenance activities should be sited in previously disturbed areas far removed from streams, wetlands, or surface water bodies. Staging areas, along with borrow areas, should also be surveyed for listed species. Close coordination with federal, state and local permitting agencies is recommended.

We appreciate the opportunity to provide input on highway design and the conservation of fish and wildlife resources. Please contact Terry Gilbert at (850) 402-6311 or email terry_gilbert@urscorp.com to initiate the process for further overall coordination on this project.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Wildlife and Habitat issue for this alternative: Federal Highway Administration, US Forest Service

ETAT Reviews and Coordinator Summary: Cultural Issues

Coordinator Summary: Historic and Archaeological Sites Issue

3 *Moderate* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has reviewed the comments submitted by the Federal Highway Administration (FHWA), the Florida Department of State, and the Miccosukee Tribe of Indians of Florida, and recommends a Degree of Effect of Moderate.

The FDOT is aware of Historic State Road 1 that parallels US 90. The design for a possible crossing will include measures to address this historic facility. Likewise, as part of this Study the Department will be performing a CRAS to identify and evaluate any cultural resources that might be affected by this project.

No comments were received from the Seminole Tribe of Florida.

ETAT Reviews: Historic and Archaeological Sites Issue: 3 found

3 *Moderate* assigned 04/08/2010 by Cathy Kendall, Federal Highway Administration

Coordination Document: PD&E Support Document As Per PD&E Manual

Dispute Information: N/A

Identified Resources and Level of Importance: Alternatives 1, 2 and 3 may have fewer impacts for historic resources than alternatives 4-6. Alternatives 1-3 have a potentially historic structure located within 500 feet of the proposed road improvement. Alternatives 4-6 have a potentially historic structure within 200 feet of the proposed improvement. Alternatives 4-6 also have a potentially significant archaeological site (lumber mill) located within 100 feet. Alternatives 4-6 also have a potentially historic bridge located within 500 feet.

All alternatives potentially impact SR 1, an NRHP resource known as Red Brick Road.

Alternative 4 goes through a portion of the town of Milton, and would potentially impact historic structures that have not yet been identified.

Comments on Effects to Resources: Impacts to known historic sites should be avoided. A CRAS will determine the significance of the known as well as the yet to be identified historic properties. Of all the alternatives, Alternative 4 may have the most impacts to historic resources. This will need to be verified with the CRAS.

Coordinator Feedback: None

3 *Moderate* assigned 01/25/2010 by Alyssa McManus, FL Department of State

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: There are few identified resources located within the Alternative 1 project corridor. There are two standing structures, SR1095 and SR1208, within the 500 ft boundary of this project corridor. Neither of these buildings appears to have been evaluated. There is one National Register- listed site, which is Florida State Road No. 1, 8SR1313, located within the 100 ft boundary of this project corridor. This is also the only resource group identified within this buffer.

In 1929, Florida State Road 1 became part of the federal highway system and officially became US 90. It was listed in the NRHP in 2002. Careful consideration should be taken to determine if this project will adversely affect this resource.

Comments on Effects to Resources: The lack of identified cultural resources most probably reflects the lack of any formal CRAS for this project corridor. Also, it is unknown what impact this project will have on State Road 1. For this reason, we are recommending that a CRAS be performed to identify and evaluate any cultural resources that might be affected by this project.

Coordinator Feedback: None

2 *Minimal* assigned 01/19/2010 by Steve Terry, Miccosukee Tribe of Indians of Florida

Coordination Document: No Selection

Dispute Information:N/A

Identified Resources and Level of Importance: There are no recorded archaeological sites reported near this project. However, a Cultural Resources Survey will need to be done to ascertain if there are any archaeological sites within the project boundaries.

Comments on Effects to Resources: Once a Cultural Resources Survey has been done, then effects, if any, to archaeological sites can be ascertained.

Additional Comments (optional): If the Cultural Resources Survey shows there are no archaeological sites that will be impacted by this project, then no further consultation is necessary. However, if the Cultural Resources Survey does show that archaeological sites will be impacted by this project, then further consultation with the Miccosukee Tribe should be done.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Historic and Archaeological Sites issue for this alternative: Seminole Tribe of Florida

Coordinator Summary: Recreation Areas Issue

4 Substantial assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has reviewed the comments submitted by the Florida Department of Environmental Protection (FDEP) and the US Environmental Protection Agency (EPA), and recommends a Degree of Effect of Substantial.

The FDOT is aware Alternative 2 will need to cross the Blackwater Heritage State Trail. As such, coordination and mitigation as necessary will be pursued with OGT, the Board of Trustees of the Internal Improvement Trust Fund, or any other Governing Board.

In addition, FDOT is aware that Alternative 2 traverses lands that are planned for purchase as part of the The Clear Creek/Whiting Field Florida Forever BOT Project. Should this alternative be selected, the location and design efforts will be closely coordinated with the Naval Air Station, BOT, and Santa Rosa County to ensure minimal impacts to the project.

No Comments were received from the Federal Highway Administration (FHWA) or the National Park Service.

ETAT Reviews: Recreation Areas Issue: 2 found

4 Substantial assigned 01/29/2010 by Lauren P. Milligan, FL Department of Environmental Protection

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information:N/A

Identified Resources and Level of Importance: Alternative 2 crosses the Blackwater Heritage State Trail and Clear Creek/Whiting Field Florida Forever BOT Project.

Comments on Effects to Resources: These lands contain significant natural communities and numerous element occurrences of listed species, as indicated by the Florida Natural Areas Inventory. The Department is interested in preserving the area's natural communities, wildlife corridor functions, natural flood control, stormwater runoff filtering capabilities, aquifer recharge potential, and recreational trail opportunities. Therefore, future environmental documentation should include an evaluation of the primary, secondary, and cumulative impacts of roadway construction on the above public lands and proposed acquisition sites.

Additional Comments (optional): Under Article X, Section 18 of the Florida Constitution (as amended in 1998), dispositions of state-owned conservation lands are restricted to those lands "no longer needed for conservation purposes." If the proposed highway connector construction activities necessitate right-of-way creation within these state and water management district lands, the applicant will need to request that the Board of Trustees of the Internal Improvement Trust Fund or Northwest Florida Water Management District Governing Board determine whether the subject properties are no longer needed for conservation purposes. This requirement must be met before the conveyance of these lands can proceed. In addition, please be advised that proposals to utilize state conservation lands may be required to meet the guidelines of the state's linear facility policy, POLICY Use of Natural Resource Lands by Linear Facilities As Approved By Board of Trustees of the Internal Improvement Trust Fund on January 23, 1996.

Coordinator Feedback: None

3 Moderate assigned 01/29/2010 by Madolyn Dominy, US Environmental Protection Agency

Coordination Document: No Selection

Dispute Information:N/A

Identified Resources and Level of Importance: Resources: Recreation Areas - recreational trails, conservation lands, wildlife management areas, Florida Forever BOT Projects, Florida Managed Areas, Greenways and Trails, Public Parks, etc.

Level of Importance: These recreational areas are of a high level of importance in the State of Florida. A moderate degree of effect is being assigned to this issue for the proposed project Alternative 2 (ETDM #12597, SR 87 Connector).

Comments on Effects to Resources: The alignment for Alternative 2 is within close proximity to the Blackwater Heritage State Trail and the Clear Creek/Whiting Field Florida Forever BOT Project.

The Blackwater Heritage State Trail is part of Florida's System of Greenways and Trails. It is the State's westernmost rail trail and runs from Milton to Whiting Field Naval Air Station. The trail could be directly and indirectly impacted by the roadway project.

The Clear Creek/Whiting Field Florida Forever BOT Project is also within the proposed Alternative 2 alignment. Florida Forever Board of Trustees (BOT) projects are lands that have been proposed for acquisition because of outstanding natural resources, opportunity for natural resource-based recreation, or historical and archaeological resources. Portions of these projects may have already been acquired by the State and/or its acquisition partners. The Clear Creek/Whiting Field Florida Forever BOT project is one of the top projects on the 'A' priority list. The project helps to create a conservation land buffer to Naval Air Station Whiting Field which will protect surrounding water bodies and allowing for expanded recreation opportunities. The Clear Creek/Whiting Field Florida Forever BOT project connects to a portion of the Blackwater River State Forest, one of the state's largest natural areas, and provides habitat for many endangered and threatened plants and animals, including gopher tortoises, southeastern weasel, white-topped pitcher plant, spoon-leaved sundew, panhandle lily and the hairy-peduncled beakrush. Located near Milton in Santa Rosa County, the majority of the project consists of upland pine forests, sand hills, and mature and young pine plantations.

EPA is assigning a moderate degree of effect to this issue due to the fact that the roadway could impact these recreation areas. Also, resulting development in the corridor would have significant indirect and cumulative impacts on these types of resources. FDOT should evaluate direct, indirect, and cumulative impacts to recreation areas features such as the one listed and any other public or private parks within the vicinity. The PD&E study should include a survey of the area to identify if any recreation areas which would require a Section 4(f) review are present in the project area. Opportunities to avoid and or minimize impacts and fragmentation to recreational resources should be evaluated and considered to the greatest extent practicable.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Recreation Areas issue for this alternative: Federal Highway Administration, National Park Service

Coordinator Summary: Section 4(f) Potential Issue

3 *Moderate* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has reviewed the comments from the Federal Highway Administration (FHWA) and recommends a Degree of Effect of Moderate.

As outlined in the FHWA comments, the SR 1 Red Brick Road (Trail) historic site, and the Blackwater River Heritage Trail will be crossed with this corridor. As such, in conjunction with the CRAS that will be prepared for this Study a determination of applicability will be needed to determine if the facilities are Section 4(f)resources.

ETAT Reviews: Section 4(f) Potential Issue: 1 found

3 *Moderate* assigned 04/08/2010 by Cathy Kendall, Federal Highway Administration

Coordination Document: PD&E Support Document As Per PD&E Manual

Dispute Information:N/A

Identified Resources and Level of Importance: Alternatives 3-6 have potential impacts to recreational lands or lands used as a wildlife refuge, that may be protected under Section 4(f).

All alternatives have potential to affect historic resources that may be protected under Section 4(f). The extent of these potential historic resources for each alternative are described below (as previously stated in comments for historic resources). Alternatives 4-6, however, appear to have greater potential to impact historic resources, which may be protected under Section 4(f)

Alternatives 1, 2 and 3 may have fewer impacts for historic resources than alternatives 4-6. Alternatives 1-3 have a potentially historic structure located within 500 feet of the proposed road improvement. Alternatives 4-6 have a potentially historic structure within 200 feet of the proposed improvement. Alternatives 4-6 also have a potentially significant archaeological site (lumber mill) located within 100 feet. Alternatives 4-6 also have a potentially historic bridge located within 500 feet.

All alternatives potentially impact SR 1, an NRHP resource known as Red Brick Road.

Alternative 4 goes through a portion of the town of Milton, and would potentially impact historic structures that have not yet been identified.

Comments on Effects to Resources: Impacts to known parks, recreation and wildlife refuge areas and historic sites protected under Section 4(f) should be avoided. A CRAS will determine the significance of the known as well as the yet to be identified historic properties. Of all the alternatives, Alternative 4 may have the most impacts to historic resources. This will need to be verified with the CRAS. A determination of applicability will be needed to determine if each park, recreation area or wildlife refuge area is, in fact, a Section 4(f) resource.

Coordinator Feedback: None

ETAT Reviews and Coordinator Summary: Community Issues

Coordinator Summary: Aesthetics Issue

2 *Minimal* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) recommends a Degree of Effect of Minimal for aesthetics.

The majority of land within the project area is agriculture with a few residential homes dispersed in the area. The proposed roadway improvements should not significantly alter any viewsheds or vistas, but may contribute to changing the rural character of the area. However, the Blackwater River is an established aesthetic feature in the project area. The proposed river crossing is to co-locate with a major power transmission line that crosses the river. Therefore, the Alternative crosses the river in an area that already has a significant disruption to the view sheds.

During the Project Development and Environment (PD&E) Study, a noise evaluation will be conducted. In addition, input from the public will be solicited on potential project effects on community aesthetics. The FDOT will consider incorporating aesthetic enhancements such as landscaping, into project design plans. Coordination with the community will occur throughout the PD&E Study.

No comments were received from the Federal Highway Administration (FHWA), the Florida-Alabama Transportation Planning Organization (TPO).

ETAT Reviews: Aesthetics Issue: None found

The following organization(s) were expected to but did not submit a review of the Aesthetics issue for this alternative: Federal Highway Administration

Coordinator Summary: Economic Issue

1 *Enhanced* assigned 04/20/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) recommends a Degree of Effect of Enhanced for economic.

Access to intermodal facilities and movement of goods and freight are also important considerations in the development of an effective transportation system. This is an enhancement provided with this Alternative by providing a link from northern areas of the County to areas in the southern end of the County. In addition it would establish the needed SIS link between Whiting Field and I-10 and the SR 87S SIS facility. The Santa Rosa County Aviation Industrial Park will also be provided improved access to the SIS facilities to the south.

The bicycle and pedestrian enhancements and improvements proposed along the new facility would increase safety, pedestrian mobility, connectivity between residential and nonresidential areas, and would provide access for transportation disadvantaged populations. As a result of the proposed improvements, property values for commercial uses within the County that benefit from this Alternative are likely to increase along with the County's tax base.

The FDOT will conduct public outreach to residents and businesses in the area to solicit input on the project, particularly concerning access. The FDOT will also develop and maintain channels of communication between the proposed subdivision developers, the City of Milton and Santa Rosa County officials, and the NASWF concerning the proposed project, including notifying them of upcoming public meetings.

No comments were received from the Federal Highway Administration (FHWA), and the Florida-Alabama Transportation Planning Organization (TPO).

ETAT Reviews: Economic Issue: None found

The following organization(s) were expected to but did not submit a review of the Economic issue for this alternative: Federal Highway Administration

Coordinator Summary: Land Use Issue

2 *Minimal* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation has reviewed the comments submitted by the Florida Department of Community Affairs (DCA), and the Naval Air Station Whiting Field (NASWF), and recommends a Degree of Effect of Minimal.

Through consultation with Santa Rosa County Land Use staff, it was confirmed that the County's Map 4-3 "Needs Not Cost Feasible with Existing Resources," modified November 2008, the project is identified and it was on the previous Map 4-4 "Not Cost Feasible with Existing Revenue Sources," dated April 2002. Only one general alignment was shown which is similar to the general alignment in the TPO's Long Range Transportation Plan. The map does not, however, show the alternative alignments because they are determined through the corridor analysis and PD&E study. One will be selected as the preferred alignment, and it will go into the Comprehensive Plan. It will remain on the "Not Cost Feasible" map until we can show construction is cost feasible.

In addition, funding for this project is on Table 10-1 of the Schedule of Capital Improvements, page 10-13 of the Comprehensive Plan. It was \$490,000 in FY 09, a federal earmark. The description is not more specific because we generally use the language of the earmark itself; however, we can be more specific in the future. This PD&E study is actually funded by three earmarks with the \$490,000 as the second earmark. The first was originally appropriated in FY 07, so it is not shown in the Schedule of Capital Improvements, since it was outside the five-year window of the schedule: FY 08 - FY 12. The third was \$475,000 appropriated for FY 10, which should be added to the Comprehensive Plan. No funding has been identified for the further phases of final design, right-of-way, or construction. But, this is typical of most projects. It is very rare that a project is funded through all phases at one time. The funding that we knew of at the time is in the Schedule of Capital Improvements. All earmark funds have been in the TIP and STIP.

The County also believes that if an alternative is not found to the existing roadways, sprawl will extend even further beyond the study area, congestion will worsen on US 90/SR 87 and job growth in particular in the East Milton industrial area will halt. The County's Comprehensive Plan also provides guidance on development around the military base, but application of the land development code (LDC) further defines, for instance, protections for military airport zones (MAZs). In the LDC, some types of development are compatible with air operations, such as industrial development. The County is building an aviation industrial park adjacent to NAS Whiting Field, made possible by an agreement with the Navy.

Santa Rosa County is nationally known for its cooperation with the Navy to achieve goals of both the County and the military. So, at the very general level of the Comprehensive Plan, a project may appear to be inconsistent, but in fact stronger protections exist such as in the LDC.

The project is also in the Florida - Alabama Transportation Planning Organization (TPO)'s 2025 Long Range Transportation Plan Cost Feasible Plan, adopted in Dec 2005.

The Federal Highway Administration (FHWA) did not provide comments.

ETAT Reviews: Land Use Issue: 2 found

3 *Moderate* assigned 03/02/2010 by Gary Donaldson, FL Department of Community Affairs

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: Consistency review for proposed State Road 87 Connector project

Reviewed for consistency with the Santa Rosa County Comprehensive Plan and the City of Milton Comprehensive Plan

The State Road 87 Connector ETDM project is a proposed new roadway in Santa Rosa County which consists of six alignment alternatives associated with this review. The project is intended to provide an alternative to the existing shared facility of State Road 87 and US 90 which currently operates at a failing level of service. The indicated need for a new corridor is to provide additional capacity and improve regional connectivity.

Alternatives 1, 2 and 3 identify alternative connections to State Road 87 and US 90, which are located northeast of the City of Milton. Alternatives 2 and 3 traverse areas adjacent to Florida Forever lands. Alternatives 4, 5 and 6 connect State Road 87 to US 90 south of the City of Milton crossing the Blackwater River. The alternatives south of Milton are intended to route traffic around the City of Milton Historic District.

A portion of State Road 87 is identified in the Santa Rosa Comprehensive Plan 2008-2025 Comprehensive Plan Capital Improvements Element as a Federal earmark multi-laning project. However, the Element does not reference project boundaries associated with this specific improvement. The ETDM Project Description does not identify a funding source for this project.

None of the project alternatives are identified on Map 4-3 of the Santa Rosa County 2020 Future Transportation Map and none are identified on Map A of the City of Milton Future Transportation Map.

The State Road 87 Connector project (including its alternatives) is not consistent with the comprehensive plans of Santa Rosa County or the City of Milton for the following reasons:

- (1) It is not specifically identified in the Santa Rosa County or the City of Milton Comprehensive Plans.
- (2) It is not identified on the Future Transportation Maps of Santa Rosa County or the City of Milton.
- (3) It is not specifically identified in the Five-Year Capital Improvement Schedule of Santa Rosa County and the City of Milton.
- (4) It is inconsistent with Policy 8.1.D.6 of the Conservation Element of the Santa Rosa County Comprehensive Plan, which states that new public infrastructure should not be planned where development may be promoted in environmentally sensitive lands.
- (5) It is inconsistent with Objective 3.3A of the Future Land Use Element of the Santa Rosa County Comprehensive Plan, which requires that future development within adopted Military Airport Zones (MAZs) not negatively impact current and long term viable use of airfields by limiting incompatible land uses.

The project should be modified to be consistent with the policies identified above and the local government comprehensive plans should be revised to include this project before it advances into the FDOT Five Year Work program.

Staff review of the project addressed the following concerns:

Land use --

Alternatives 1, 2, and 3 of the State Road 87 Connector project are located to the northeast of the City of Milton and connect through land designated as "Agriculture (AG)" on Map 3-1 of the Santa Rosa County Future Land Use Map. Construction of a roadway along these corridors has the potential to promote urban sprawl, based on the definitions in Rules 9J-5.003(134) and 9J-5.006(5), F.A.C.

(134) "Urban sprawl" means urban development or uses which are located in predominantly rural areas, or rural areas interspersed with generally low-intensity or low-density urban uses, and which are characterized by one or more of the following conditions: (a) The premature or poorly planned conversion of rural land to other uses; (b) The creation of areas of urban development or uses which are not functionally related to land uses which predominate the adjacent area; or (c) The creation of areas of urban development or uses which fail to maximize the use of existing public facilities or the use of areas within which public services are currently provided. Urban sprawl is typically manifested in one or more of the following land use or development patterns: Leapfrog or scattered development; ribbon or strip commercial or other development; or large expanses of predominantly low-intensity, low-density, or single-use development.

The information provided in the ETDM Project Description is insufficient to determine the impacts of the project on urban sprawl or greenhouse gas emissions. The project has been discussed with Santa Rosa County planning staff who indicated that the selected alignment alternative is intended to be constructed as a limited access roadway. If so, contribution to urban sprawl and greenhouse gas emissions may be mitigated, depending on usage and access characteristics.

Objective 3.1.A of the Santa Rosa County Comprehensive Plan Future Land Use Element requires future land uses to be coordinated in order to ensure the protection of natural resources and with the availability of adequate infrastructure, the reduction of greenhouse gas emissions. Alternatives 1,2, and 3 connect through agricultural, single family residential, industrial and conservation/recreation land uses. While Alternatives 4, 5 and 6 maximize the use of existing roadway infrastructure as identified in the ETDM Project Description, Alternatives 1,2 and 3 as described may not protect natural resources and reduce greenhouse gas emissions.

The portions of alternatives traversing through the City of Milton connect through commercial uses as identified on the City Future Land Use Map. The City of Milton Comprehensive Plan does not contain policies within its plan that address the reduction of greenhouse gas emissions.

Transportation --

The ETDM Purpose and Need Statement identifies State Road 87 as a vital evacuation route for Gulf Breeze and Navarre residents to travel northbound. State Road 87 is also identified as a hurricane evacuation route on Map 4-2 Santa Rosa Future Transportation Map 2025. However, the current route connects using a congested portion of US 90 through the City of Milton downtown section.

The project is identified in the MPO 2020 Cost Feasible Plan as a Project Development and Environment Study (PD& E) consisting of preliminary design phases. The roadway corridor selected will be a two-lane facility with right-of way acquired for a four lane facility. No funding sources have currently been identified for the project. Further, the anticipated residential and business growth of Santa Rosa County emphasizes the need for an improved roadway network which will better facilitate traffic along the existing corridor.

Conservation -

Policy 8.1.D.6 of the Santa Rosa County Comprehensive Plan Conservation Element requires that new public infrastructure be compatible with future and existing land uses and should not promote increased development located in environmentally sensitive lands. The proposed roadway alternatives located to the north and east of the City of Milton (Alternatives 1, 2 and 3) are located in agriculturally designated areas on the Santa Rosa County Future Land Use Map. Portions of the roadway alternatives are also located close to the Clear Creek/Whiting Field Florida Forever Project Boundary. Construction of a new roadway through and around areas designated for conservation has the potential to jeopardize environmental resources located in and around the Florida Forever project Boundary and surrounding agricultural areas. The project is therefore inconsistent with Santa Rosa Comprehensive Plan Policy 8.1.D.6.

Military Facility-

Objective 3.3.A of the Santa Rosa County Comprehensive Plan Future Land Use Element requires that future development within adopted Military

Airport Zones (MAZs) and Public Airport Zones (PAZs) not negatively impact current and long term viable use of the airfield by limiting incompatible land uses. Portions of the proposed location of roadway Alternatives 1, 2 and 3 are located within, or near the Airport Zones identified on Map 3-18 of the Future Land Use Map Series (NAS Whiting Field Military Airport Zone (MAZ) Map) contained within the Santa Rosa County Comprehensive Plan. The map identifies Accident Potential Zones within the MAZ boundaries. Accident Potential Zones refer to areas with a greater potential for accidents to occur around airport facilities.

Alternatives 2 and 3 of this project are inconsistent with Objective 3.3.A of the Santa Rosa County Comprehensive Plan and Map 3-18 of the Santa Rosa County Future Land Use Map Series (NAS Whiting Field Military Facility) because of safety concerns involving the potentially adverse impacts of new roadway construction and vehicle traffic passing through Airport Zone boundaries around the existing military facility. Alternative 1 is located near the Airport Zone, but is located outside of the Airport Zone boundary.

Comments on Effects to Resources: see above

Coordinator Feedback: None

2 *Minimal* assigned 02/14/2010 by Randy Roy, Naval Air Station Whiting Field

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information: N/A

Identified Resources and Level of Importance: Alternative 2 may have minimal to moderate impact on Naval Air Station Whiting Field's mission.

Comments on Effects to Resources: Possible increase in development immediately adjacent Naval Air Station Whiting Field (NASWF). Though existing zoning regulations and an approved Joint Land Use Study are in place to protect the installation from incompatible development, it is important to highlight potential consequences with development trends adjacent project area. Detailed maps and land development code can be reference and included in the assessment (references are located on the Santa Rosa County Planning and Zoning website).

NASWF has two multi-year agreements to acquire conservation lands and properties adjacent the installation. The goal is to partner with county and state to conserve environmentally sensitive lands and buffer the installation's mission from incompatible development. Alternative 2 could have potential impacts due to acquired conservation lands located immediately south of NASWF. Encourage study incorporate language/maps identifying these targeted areas of concern and their potential impacts on the planning/alternative selection. The specifics in regards to these on-going conservation efforts are listed in the Florida Forever project list (Clear Creek I, Clear Creek II, and a potential add-on project called Wolfe Creek Forest). Santa Rosa County and NAS Whiting Field have also partnered in developing an Area of Concern Map (available via the SRC Planning and Zoning website).

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Land Use issue for this alternative: Federal Highway Administration

Coordinator Summary: Mobility Issue

1 *Enhanced* assigned 04/21/2010 by FDOT District 3

Comments: The FDOT agrees with the Florida Department of Environmental Protection and recommends a Degree of Effect of Enhanced.

This project will not only improve mobility for motoring traffic, but it will also enhance bicycle and pedestrian travel by providing an improved and expanded network.

The Federal Highway Administration (FHWA) and the Federal Transit Administration did not provide comments.

ETAT Reviews: Mobility Issue: 1 found

1 *Enhanced* assigned 01/29/2010 by Lauren P. Milligan, FL Department of Environmental Protection

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information: N/A

Identified Resources and Level of Importance: The project provides connectivity between several "High" Multi-Use Trail Priority Corridors: the Blackwater Heritage Trail, the Highway 191 (Munson Highway) Corridor and the Whiting Bike Trail Corridor. Alternative 1 crosses the Blackwater Heritage Trail; Alternative 3 is in close proximity to the Naval Air Station at Whiting Field, the Coldwater Creek Florida Forever Project and the proposed Blackwater Heritage State Trail Extension; and multiple alternatives cross the Florida National Scenic Trail. Steps should be taken to ensure the protection and enhancement of the existing trails. Inclusion of a multi-use trail facility within the entire project area could enhance connectivity between the various existing and future trail systems, alleviate traffic and enhance mobility while enhancing alternate forms of transportation. Location of the road alignment could, however, make access difficult for trail users. Future adjacent development could affect the trail by generating increased vehicular traffic. Enhancements to alternate transportation and trail safety would occur if a grade separated crossing (for the trail) is included with the roadway design. Coordination is recommended to ensure that impacts to the trail are given due consideration and that they can benefit the multiple uses of the trail.

Comments on Effects to Resources: Since 1995, the Florida Department of Environmental Protection's Office of Greenways & Trails (OGT) has been working with the University of Florida to identify the best opportunities to protect ecological connectivity statewide. To that end, the Florida Ecological Greenways Network (Network) was developed through a decision support model and collaborative process involving technical input from the Florida Greenways Commission, the Florida Greenways Coordinating Council, state, regional and federal agencies, scientists, conservation groups, planners and the general public. Since its legislative adoption in 1999, the Network has been prioritized to rank all areas into classes based upon value for ecological connectivity. The Ecological Linkages represent areas that are most important to protect because of their ability to connect existing ecological hubs and because of the potential threats of development.

The proposed project is in an area that has been identified as a Critical Ecological Linkage within Florida. Because of the long range potential for this area to serve as an ecological connector for protection of wildlife, OGT staff suggests that appropriate steps be considered as part of the project. Underpasses or other steps may be appropriate in order to maintain or establish habitat connectivity and a safe path for wildlife.

For further information and assistance, please contact Ms. Robin Turner at (850) 245-2909.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Mobility issue for this alternative: Federal Highway Administration,

Coordinator Summary: Relocation Issue

2 *Minimal* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) recommends a Degree of Effect of Minimal for relocation.

Additional ROW will be required to accommodate the improvements and associated ponds. There are a few residences within the 200-foot buffer distance that may be effected as the Alternative approaches SR 87N.

Potential residential, business, and public facility relocations will be analyzed in detail throughout the Project Development and Environment (PD&E) Study. Depending on the project alignment and alternative selected, there is a potential for displacement of residences. Relocation efforts will be further analyzed as more detailed project information and ROW needs become available. Relocations should be minimized and any identified historic residences located along the project should be avoided where reasonable and feasible. Any potential relocation should be evaluated to ensure that there are no disproportionate adverse impacts to any distinct minority, ethnic, elderly, or handicapped groups and/or low-income households.

This project will be developed in accordance with the Civil Rights Act of 1964, as amended by the Civil Rights Act of 1968. Along with Title VI of the Civil Rights Act, Executive Order 12898 (Environmental Justice) which ensures that minority and/or low-income households are neither disproportionately adversely impacted by major transportation projects, nor denied reasonable access to them by excessive costs or physical barriers (Environmental Protection Agency [EPA], 1994).

No comments were received from the Federal Highway Administration (FHWA), or the Florida-Alabama Transportation Planning Organization (TPO).

ETAT Reviews: Relocation Issue: None found

The following organization(s) were expected to but did not submit a review of the Relocation issue for this alternative: Federal Highway Administration

Coordinator Summary: Social Issue

3 *Moderate* assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has reviewed the comments made by the US Environmental Protection Agency (EPA) and recommends a Degree of Effect of Moderate. The FL Department of Community Affairs had no comments.

The DOT agrees with EPA's assessment that there will be social benefits from this project. However, the FDOT understands there may be issues associated with the effects caused from a new roadway facility. To address those issues, the project team will be utilizing an on-going public involvement program throughout the PD&E Study.

The Federal Highway Administration (FHWA) did not comment.

ETAT Reviews: Social Issue: 2 found

0 *None* assigned 03/02/2010 by Gary Donaldson, FL Department of Community Affairs

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: Social impacts cannot be determined for the project at this time.

Comments on Effects to Resources: None found.

Coordinator Feedback: None

3 *Moderate* assigned 02/01/2010 by Madolyn Dominy, US Environmental Protection Agency

Coordination Document: No Selection

Dispute Information: N/A

Identified Resources and Level of Importance: Resources: Social impacts to features such as residential populations, residential communities, commercial businesses, social service facilities, minority or low-income populations, disadvantaged populations, archeological and historic areas or structures, etc.

Level of Importance: These resources are of a high level of importance. Impacts to these types of resources, both positive and negative, should be evaluated and documented in the PD&E phase of the project. A moderate degree of effect is being assigned to this issue for the SR 87 Alternatives.

Comments on Effects to Resources: According to the project description, the primary need for this new corridor is to provide additional capacity, and to improve regional connectivity by providing a more direct route from areas of high growth in northern Santa Rosa County, such as the Berryhill Road area, to I-10 and to areas further to the south. Likewise, access will be improved to and from I-10 for the Whiting Field U.S. Naval Air Station, and the County's Joint Use Planning Area near Whiting Field. It is also anticipated that this new facility would provide relief to Ward Basin Road and its intersection with US 90. It is also intended to provide much needed relief to the US 90 Blackwater Bridge.

Santa Rosa County has been experiencing considerable growth over the past year, and has grown in its own right, but also as a bedroom community to the greater Pensacola area. This growth has spurred the need for an improved roadway network. In addition, there are several major traffic generators within the US 90 corridor area, such as new residential developments, the Santa Rosa Criminal Justice Center, the Santa Rosa Corrections Facility, Whiting Field U.S. Naval Air Station, Team Rosa Joint Planning area near Whiting Field, and the Santa Rosa Commerce Park, which would all benefit from the capacity this facility will provide. The need for the project is also related to committed trips associated with future development in the northern portions of Santa Rosa County, as well as, the future development along the US 90 corridor, which is hindered by the existing capacity limits of US 90. Santa Rosa County has grown 173% since 1980 and is expected to grow another 92% by 2030. This increase will put further demand on the US 90/SR 87 segment, making growth and evacuation difficult due to a lack of capacity.

EPA is assigning a moderate degree of effect to this issue. There will be social benefits resulting from the project due to congestion relief and an improvement in mobility with the new SR 87 Connector project. However, there are several social issues to be considered. The project should take into account various social issues and impacts for each of the Alternatives. These issues may include, but are not limited to, population and growth estimates, community cohesion, noise, vibration, visual aesthetics, environmental justice issues, low income populations, elderly populations, economic development, land acquisition, displacements or relocations, effects on special populations, archeological and historic areas or structures, and other social features that may be affected by the project.

These issues should be evaluated and addressed during the PD&E phase of the project. EPA recommends that any negative direct and indirect impacts to social resources and affected communities be avoided or minimized to the best extent practicable. Public involvement on this project should be ongoing and continual throughout the project.

EPA recommends that a Sociocultural Effects (SCE) Evaluation be considered as detailed in the FDOT document entitled Sociocultural Effects in ETDM. This document outlines the importance of evaluating sociocultural effects throughout the transportation planning and development process. An SCE Evaluation is used to assess community impacts utilizing both quantitative and qualitative methods. The SCE Evaluation should be based on the best available data and provide for adequate public involvement and outreach activities.

Some of the issues to be considered when conducting an SCE Evaluation include: social consequences to surrounding or interconnected communities; demographics of affected community; displacement of population; increase/decrease of population as a result of the project; displacement of minority populations; and disproportionate effects on special populations. The particular types of social issues that are important for this proposed project should be evaluated.

Coordinator Feedback: None

The following organization(s) were expected to but did not submit a review of the Social issue for this alternative: Federal Highway Administration

ETAT Reviews and Coordinator Summary: Secondary and Cumulative Issues

Coordinator Summary: Secondary and Cumulative Effects Issue

4 Substantial assigned 04/21/2010 by FDOT District 3

Comments: The Florida Department of Transportation (FDOT) has evaluated comments from the US Fish and Wildlife Service (USFWS), and the Northwest Florida Water Management District (NFWFMD) and recommends a Degree of Effect of Substantial.

The FDOT, in conjunction with the Federal Highway Administration (FHWA), will be facilitating a task force to evaluate and provide guidance on Indirect (Secondary) and Cumulative Effects. This task force consists of representatives from the FHWA, the FDOT, various agencies, and regional planning councils. The output of this task force will be guidance in the form of a White Paper along with possible revisions to the Environmental Screening Tool (EST) to facilitate Indirect and Cumulative Effects Analysis. A Cumulative Effects Evaluation will also be conducted as part of the Project Development and Environment (PD&E) Study.

ETAT Reviews: Secondary and Cumulative Effects Issue: 2 found

4 Substantial assigned 01/29/2010 by Leigh Brooks, Northwest Florida Water Management District

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information: N/A

At-Risk Resource: Water Quality and Quantity

Comments on Effects: Existence of the new roadway could lead to development of undeveloped proximate areas, particularly approaching SR 87 North. Conversion of the natural landscape that reduces vegetation, exposes bare soil, and alters surface hydrology would degrade water quality.

Incremental and interactive effects on wetland and floodplain resources, water quality, and associated sensitive terrestrial and aquatic habitats can be expected. These changes may reduce the quality of remaining resources and cause further wetland impacts, fragmentation, hydrologic alteration, and associated impacts to water quality and habitats.

Impacts from development associated with this corridor present less of a concern because there are suitable upland areas for development, however development will increase impervious surface and could increase stormwater runoff, diminishing water quality.

Recommended Avoidance, Minimization, and Mitigation Measures: Minimizing the total project footprint, especially in sensitive areas, combined with strict stormwater controls will help minimize impacts to water quality. Impacts to wetlands and surface hydrology could be minimized this way as well, and more so by raising the roadway over wetlands and flood hazard areas in the form of a viaduct or extended elevated bridge, allowing for free movement of plants, animals and water and maintaining the natural water quality benefits provided by these lands.

Recommended Actions to Improve At-Risk Resources: - Plan stormwater treatment and management to provide for protection of both flows and water quality, and identify and implement opportunities for retrofit.

- Carefully examine and resolve any existing issues with drainage related impacts.
- Develop a detailed plan of best management practices encompassing both construction and facility design. These should be designed to protect against nonpoint source pollution (both long-term and during construction), prevent offsite wetland and water quality impacts, and maintain hydrologic connectivity.
- Protect wetland systems and functions, including isolated wetlands.
- Conduct early consultation with the District to develop wetland mitigation alternatives.
- Plan stream and bank protection measures so as to protect and/or restore riparian habitat the full width of the natural floodplain.
- Incorporate extended bridging in areas important to hydrologic and habitat connectivity.
- Minimize the total footprint of the project.
- Minimize the effective impervious area.
- Conduct advance planning with local governments and state agencies to prevent adverse cumulative impacts associated with anticipated and spin-off development.

At-Risk Resource: Wetlands

Comments on Effects: The overall and long-term cumulative effects of the proposed roadway include direct project impacts and related development along with incremental and interactive effects from anticipated and spin off development to wetland and floodplain resources, water quality, and associated sensitive terrestrial and aquatic habitats. These changes will reduce the quality of remaining resources and cause further wetland impacts, fragmentation, hydrologic alteration, and associated impacts to water quality and habitats.

Impacts from development associated with this corridor present less of a concern because there are suitable upland areas for development.

Recommended Avoidance, Minimization, and Mitigation Measures: Early interagency planning and coordination of wetland mitigation alternatives are required in accordance with Section 373.4137, Florida Statutes.

Work with local government to discourage development activities adjacent to environmentally sensitive water resources. Determine the future land uses for currently undeveloped regions and design roadway infrastructure and mitigation measures to accommodate associated development activities.

Minimize the project footprint; use extended bridges in areas important to hydrologic and habitat connectivity.

Recommended Actions to Improve At-Risk Resources: - Follow the process for mitigation of wetland impacts required under s. 373.4137, F.S. Initiate coordination with the District as soon as possible.

- Develop a detailed plan of best management practices encompassing both construction and facility design. These should be designed to maintain hydrologic connectivity and to prevent nonpoint source pollution (both long-term and during construction), offsite wetland and water quality impacts, and habitat fragmentation.
- Protect wetland systems and functions, including isolated wetlands.
- Carefully examine and resolve any existing issues with drainage related impacts.
- Plan stream and bank protection measures so as to protect and/or restore riparian habitat the full width of the natural floodplain.
- Incorporate extended bridging in areas important to hydrologic and habitat connectivity.
- Minimize the project footprint.
- Minimize the effective impervious area.
- Conduct advance planning with local governments and state agencies to prevent adverse cumulative impacts associated with anticipated and spin-off development.

Coordinator Feedback: None

4 Substantial assigned 01/22/2010 by Mary Mittiga, US Fish and Wildlife Service

Coordination Document: To Be Determined: Further Coordination Required

Dispute Information: N/A

At-Risk Resource: Wildlife and Habitat

Comments on Effects: The secondary effects of a new road alignment will extend outward from the roadway for variable distances, depending on the nature of the effect. Examples of secondary effects to wildlife and habitat include: transport of particulate and chemical materials, such as sediment, mineral nutrients, and heavy metals; micro-climate changes; roadkill; roadside maintenance activities; traffic noise; traffic vibration; the attraction effect of light; hydrological alterations; habitat fragmentation; disruption of wildlife movement corridors; increased human access; new development with habitat loss, and the spread of invasive, non-native plant species. A new roadway will provide access for development into adjoining natural lands which provide habitat for numerous wildlife species. Corridors 2 and 3 may result in additional development near to Naval Air Station Whiting Field, impacting land manager's ability to implement prescribed burning for habitat improvement. Due to recent rapid coastal development in Florida and throughout the U.S., the secondary and cumulative effects of new growth associated with the corridor should be evaluated.

Recommended Avoidance, Minimization, and Mitigation Measures: The following measures are recommended to avoid and minimize secondary and cumulative impacts to wildlife and habitat:

Environmentally-sensitive bridge construction should be used.

Post-project monitoring should occur regularly to determine identify and control invasive, non-native species.

Water quality protection measures to Environmental Resource Permitting (ERP) standards or better should be in place within these high quality undeveloped watersheds.

Specific water quality protection Best Management Practices (BMPs) should be developed to avoid and minimize potential effects to designated critical habitat for the Gulf sturgeon and reticulated flatwoods salamander.

Recommended Actions to Improve At-Risk Resources: None found.

At-Risk Resource: Wetlands

Comments on Effects: The secondary effects of a new road alignment will extend outward from the roadway for variable distances, depending on the nature of the effect. Examples of secondary effects to wetlands include: transport of particulate and chemical materials, such as sediment, mineral nutrients, and heavy metals; micro-climate changes; roadside maintenance activities; hydrological alterations; increased human access; new development, and the spread of invasive, non-native plant species. A new roadway can provide access for development into adjoining natural/open lands, of which much are wetlands. Due to the recent rapid coastal development in Florida and throughout the U.S., the secondary and cumulative effects of new growth associated with the corridor should be evaluated.

Recommended Avoidance, Minimization, and Mitigation Measures: Other measures to avoid and minimize impacts to wetlands include: post-project monitoring to identify and control invasive, non-native species; additional culverts to maintain hydrologic connections between wetlands; environmentally sensitive bridge construction; and water quality protection measures.

Recommended Actions to Improve At-Risk Resources: None found.

Coordinator Feedback: None

Eliminated Alternatives

Alternative #3 - Eliminated

- **Date Updated:** 10/12/2011
- **Updated By:** FDOT District 3
- **Justification for Elimination:**

Corridor 3

Per the Federal Highway Administration's (FHWA) determination dated August 8, 2011: "Alternative 3A has been considered for elimination from further analysis. Documentation of recent State purchase of properties within the Alternative 3 corridor support elimination from further analysis. Confirmation that standard Navy covenants over the purchased property will not be modified to allow the proposed road project also supports elimination of Alternative 3A from further analysis.

The purchase of a property by the State does not specifically remove an alternative from consideration for use. Use of a resource designated as 4(f) property may not be approved unless there is no feasible and prudent avoidance alternative and the action includes all possible planning to minimize harm to the property resulting from the proposed use. It should also be noted that resources along Alternative 3A will likely be afforded Section 4(f) protection and the process to acquire rights of way from State lands with this designation is particularly arduous. Given the apparent viable alternatives that exist, Alternative 1 and Alternative 2, which do not have these identified constraints it is reasonable that Alternative 3A be removed from requiring further analysis. If Alternatives 1 or 2 have equal or nearly equal constraints which need to be considered then further analysis of the Alternative 3A corridor may be required."

Alternative #4 - Eliminated

- **Date Updated:** 10/13/2011
- **Updated By:** FDOT District 3
- **Justification for Elimination:**

Corridor 4

Per the Federal Highway Administration's (FHWA) determination dated July 26, 2011: "Multiple State and Federal ETAT members identified alternatives 4, 5, and 6 as having substantial effects on water quality, wetlands, wildlife and habitat, historical sites, recreational areas, parks, and floodplains. These effects are counter to State and Federal responsibility to avoid and minimize impacts to natural resources within this interconnected, ecologically important, highly productive, and protected area proposed project corridor.

Effects on wetlands and potential for secondary and cumulative effects were identified as topics of potential dispute by Northwest Florida Water Management District. Their dispute justification is as follows. "The proposed use is incompatible with the purpose for which District lands were acquired under the Florida Preservation 2000 program with public funds of the Florida Preservation 2000 Trust Fund, such purpose to protect valuable natural resources. (Florida Preservation 2000 Act: Florida Statute 259.101(7)). "

Additionally, alternatives 4, 5, and 6 provide only marginal improvements to providing "a more direct route from areas of high growth in northern Santa Rosa County to I-10" and improved access to I-10 from Whiting Field US Naval Air Station.

Based on the combination of identified land use, public funds invested to support that use, and other reasons it is reasonable that Alternatives 4, 5, and 6 do not require further analysis given the apparent viable alternatives exist which do not have these constraints."

Alternative #5 - Eliminated

- **Date Updated:** 10/13/2011
- **Updated By:** FDOT District 3
- **Justification for Elimination:**

Corridor 5

Per the Federal Highway Administration's (FHWA) determination dated July 26, 2011: "Multiple State and Federal ETAT members identified alternatives 4, 5, and 6 as having substantial effects on water quality, wetlands, wildlife and habitat, historical sites, recreational areas, parks, and floodplains. These effects are counter to State and Federal responsibility to avoid and minimize impacts to natural resources within this interconnected, ecologically important, highly productive, and protected area proposed project corridor.

Effects on wetlands and potential for secondary and cumulative effects were identified as topics of potential dispute by Northwest Florida Water Management District. Their dispute justification is as follows. "The proposed use is incompatible with the purpose for which District lands were acquired under the Florida Preservation 2000 program with public funds of the Florida Preservation 2000 Trust Fund, such purpose to protect valuable natural resources. (Florida Preservation 2000 Act: Florida Statute 259.101(7)). "

Additionally, alternatives 4, 5, and 6 provide only marginal improvements to providing "a more direct route from areas of high growth in northern Santa Rosa County to I-10" and improved access to I-10 from Whiting Field US Naval Air Station.

Based on the combination of identified land use, public funds invested to support that use, and other reasons it is reasonable that Alternatives 4, 5, and 6 do not require further analysis given the apparent viable alternatives exist which do not have these constraints."

Alternative #6 - Eliminated

- **Date Updated:** 10/13/2011
- **Updated By:** FDOT District 3
- **Justification for Elimination:**

Corridor 6

Per the Federal Highway Administration's (FHWA) determination dated July 26, 2011: "Multiple State and Federal ETAT members identified alternatives 4, 5, and 6 as having substantial effects on water quality, wetlands, wildlife and habitat, historical sites, recreational areas, parks, and floodplains. These effects are counter to State and Federal responsibility to avoid and minimize impacts to natural resources within this interconnected, ecologically important, highly productive, and protected area proposed project corridor.

Effects on wetlands and potential for secondary and cumulative effects were identified as topics of potential dispute by Northwest Florida Water

Management District. Their dispute justification is as follows. "The proposed use is incompatible with the purpose for which District lands were acquired under the Florida Preservation 2000 program with public funds of the Florida Preservation 2000 Trust Fund, such purpose to protect valuable natural resources. (Florida Preservation 2000 Act: Florida Statute 259.101(7)). "

Additionally, alternatives 4, 5, and 6 provide only marginal improvements to providing "a more direct route from areas of high growth in northern Santa Rosa County to I-10" and improved access to I-10 from Whiting Field US Naval Air Station.

Based on the combination of identified land use, public funds invested to support that use, and other reasons it is reasonable that Alternatives 4, 5, and 6 do not require further analysis given the apparent viable alternatives exist which do not have these constraints."

Project Scope

General Project Commitments

No General Project Commitments Found

Required Permits

No Permits Found.

Required Technical Studies

No Technical Studies Found.

Class of Action

Class of Action Determination

Class of Action: Environmental Impact Statement with **Lead Agency** Federal Highway Administration

Other Actions: Section 4(f) Evaluation

Class of Action Signatures

ACCEPTED by Peggy Kelley, FDOT ETDM Coordinator for FDOT District 3 on 05/12/2010

ACCEPTED by Cathy Kendall, Lead Agency ETAT Member for Federal Highway Administration on 05/21/2010

Comments: The following notes were included in the FHWA acceptance of the P&N, which should be reflected as the project moves forward into PD&E:

Since the intent seems to be to acquire enough right-of-way for an ultimate 4-lane project, the scope of the PD&E should assess the impacts of a 4-lane facility, with the understanding that it is likely to be a phased improvement.

DCA noted potential inconsistencies with comprehensive land use and environmental policies in their AN/ETDM review. Some of these concerns could potentially be addressed using access management standards for the project as a means of guiding secondary development to the most appropriate locations. This should be addressed during PD&E.

The project description states that the LRTP indicates the year 2025 as the design year for the project. Funding in the associated planning documents should therefore be consistent with this schedule. In other words, a portion of the construction funding would need to be indicated by the year 2025, with money for design and right-of-way programmed for earlier dates in the LRTP, TIP and STIP. FHWA would look for consistency with these documents, as well as the local comprehensive plans, before PD&E approval.

Dispute Resolution Activity Log

No Dispute Actions Found.

Project-Level Hardcopy Maps

No Project-Level Hardcopy Maps Available.

Appendices

Degree of Effect Legend

Legend			
Color Code	Meaning	ETAT	Public Involvement
N/A	Not Applicable / No Involvement	There is no presence of the issue in relationship to the project, or the issue is irrelevant in relationship to the proposed transportation action.	
0	None (after 12/5/2005)	The issue is present, but the project will have no impact on the issue; project has no adverse effect on ETAT resources; permit issuance or consultation involves routine interaction with the agency. The <i>None</i> degree of effect is new as of 12/5/2005.	No community opposition to the planned project. No adverse effect on the community.
1	Enhanced	Project has positive effect on the ETAT resource or can reverse a previous adverse effect leading to environmental improvement.	Affected community supports the proposed project. Project has positive effect.
2	Minimal	Project has little adverse effect on ETAT resources. Permit issuance or consultation involves routine interaction with the agency. Low cost options are available to address concerns.	Minimum community opposition to the planned project. Minimum adverse effect on the community.
2	Minimal to None (assigned prior to 12/5/2005)	Project has little adverse effect on ETAT resources. Permit issuance or consultation involves routine interaction with the agency. Low cost options are available to address concerns.	Minimum community opposition to the planned project. Minimum adverse effect on the community.
3	Moderate	Agency resources are affected by the proposed project, but avoidance and minimization options are available and can be addressed during development with a moderated amount of agency involvement and moderate cost impact.	Project has adverse effect on elements of the affected community. Public Involvement is needed to seek alternatives more acceptable to the community. Moderate community interaction will be required during project development.
4	Substantial	The project has substantial adverse effects but ETAT understands the project need and will be able to seek avoidance and minimization or mitigation options during project development. Substantial interaction will be required during project development and permitting.	Project has substantial adverse effects on the community and faces substantial community opposition. Intensive community interaction with focused Public Involvement will be required during project development to address community concerns.
5	Potential Dispute (Planning Screen)	Project may not conform to agency statutory requirements and may not be permitted. Project modification or evaluation of alternatives is required before advancing to the LRTP Programming Screen.	Community strongly opposes the project. Project is not in conformity with local comprehensive plan and has severe negative impact on the affected community.
5	Dispute Resolution (Programming Screen)	Project does not conform to agency statutory requirements and will not be permitted. Dispute resolution is required before the project proceeds to programming.	Community strongly opposes the project. Project is not in conformity with local comprehensive plan and has severe negative impact on the affected community.
	No ETAT Consensus	ETAT members from different agencies assigned a different degree of effect to this project, and the ETDM coordinator has not assigned a summary degree of effect.	
	No ETAT Reviews	No ETAT members have reviewed the corresponding issue for this project, and the ETDM coordinator has not assigned a summary degree of effect.	

GIS Analyses

Since there are so many GIS Analyses available for Project #12597 - SR 87 Connector, they have not been included in this ETDM Summary Report. GIS Analyses, however, are always available for this project on the Public ETDM Website. Please click on the link below (or copy this link into your Web Browser) in order to view detailed GIS tabular information for this project:

<http://etdmpub.fl-a-etat.org/est/index.jsp?tpID=12597&startPageName=GIS%20Analysis%20Results>

Special Note: Please be sure that when the GIS Analysis Results page loads, the **Programming Screen Summary Report Re-published on 10/13/2011 by Peggy Kelley Milestone** is selected. GIS Analyses snapshots have been taken for Project #12597 at various points throughout the project's life-cycle, so it is important that you view the correct snapshot.

Project Attachments

Note: Attachments are not included in this Summary Report, but can be accessed by clicking on the links below:

Date	Type	Size	Link / Description
06/08/2010	Meeting Minutes	924 KB	http://etdmpub.fl-a-etat.org/est/servlet/blobViewer?blobID=10076 Public Involvement Comments: Comments received from the March 23rd Kick-Off Mtg
12/17/2009	Ancillary AN Package Documentation	4.04 MB	http://etdmpub.fl-a-etat.org/est/servlet/blobViewer?blobID=9215 SR 87 Maps: SR 87 Connector Project Description Reference Maps
12/14/2009	Form SF-424: Application for Federal Assistance	246 KB	http://etdmpub.fl-a-etat.org/est/servlet/blobViewer?blobID=9172 SR 87 Connector: SR 87 from SR 87S to SR 87N

