

Appendix M: Comments and Responses on DEIS

MEMORANDUM

To: Peggy Kelley, Project Manager
Florida Department of Transportation, District 3

From: Metric Engineering Inc.

Project: SR 87 Connector PD&E Study/DEIS

Date: November 25, 2013

RE: To address CEMO comments in the DEIS

CEMO Comments - SR 87 DEIS 10/1/13

General

Please remove all Consultant logos from the documents. **Updated where possible, however some exhibits are from older environmental or engineering documents completed earlier in this study.**

I had very few comments on the documents reviewed. In general I think the District has done a good job on this study. My biggest issue was with keeping the documents consistent with each other.

Make sure Purpose and Need are the same in all documents, for example in the Access Management Document the Need is stated as being for a new Controlled Access facility. This is not stated in the other Documents. Most of the documents have a Purpose and Need section that differs from the DEIS. **Updated**

Overall this was a well-presented and clear project document. However, the historic and archaeological resources portions of the Affected Environment and Environmental Consequences narratives beg certain questions (included below). For the purposes of my review, the comments below are generally limited to the cultural resources and Section 4(f) materials included in the document, but I did make a few editorial remarks about the cover overview and the materials in Section 1 but in no other Sections following those. As a part of the review, I did read the ancillary information which I needed to consider in my review but made no comments upon it.

Cover Page

The revision number assigned to this DEIS is FHWA-FLA-EIS-13-04-D
Changed accordingly.

Acronyms

Pages IV-VI, DSL – Revise Department to Division. Add the following acronyms to list since they are referenced in the DEIS: FAST (Florida-Alabama Strategic Task Force); TNM; UMAM.

Changed accordingly.

1. Summary

1.1 Proposed Action

P. 1.1, First paragraph - Suggest adding that the study is being conducted by FDOT in coordination with FHWA as the lead federal agency. This document is an FHWA document.

P. 1.1, 1st sentence – added “... in coordination with FHWA as the lead federal agency...”

P. 1.1, Paragraph 2 of the Executive Summary should clearly state that this is the purpose and need for the project.

The Primary Objective stated on page 1.1 of the DEIS is not the same as the Purpose and Need on page 2.1. The primary objective is to provide more direct hurricane evacuation and serve freight movement. This is the only location that discusses freight movement. Should that be added to the Purpose and Need? Freight is also not considered in the Matrix figure 3.3.

Removed reference to freight, though SR 87 is on the TPO’s Freight network, and updated it to be reference to the military base activities.

P. 1.1 - Recommend including a brief explanation of the ETDM process to the reader.

Added intro to ETDM and the following: The ETDM process is composed of three phases which are planning, programming and project development. During the planning and programming phases, resource agencies review the purpose and need of the study, examine potential environmental and community impacts within the study area, and comment on these impacts. This information allows transportation planners to develop alternatives and minimize impacts within the study area in accordance with the agencies comments.

P. 1.1, third paragraph of Section 1.1 - please indicate that “Recommendations” is the title referenced for Section 7.3 by italicizing or placing parenthesis around the word.

P.1.1, 3rd paragraph – changed accordingly

1.2 Other Major Government Actions

In discussing the lands referenced in the third paragraph in Section 1.2, at the bottom of page 1.2: clarify any District involvement, action, or coordination toward ensuring that the designation of these conservation and Florida Forever public lands do not occupy lands needed for acquisition as FDOT right of way. Such a designation prior to our purchase of this right of way could require use to coordinate conversions through the ARC and could establish refuge lands subject to Section 4(f).

Added under 1.3, the Project Team has been in close coordination with the county on the county owned properties to ensure alternatives do not impact the proposed conservation areas.

1.3 Alternatives Considered

P. 1.3 - The alternatives map is difficult to read due to the scale of the project area. Recommend separating it out to be its own figure (Figure 1) and illustrating it as a full page alternative map.

P. 1.4, Changed accordingly

P. 1.3- Suggest adding language indicating that FDOT coordinated with FHWA in the elimination of corridors.

P. 1.3, 3rd paragraph, last sentence – changed accordingly

P. 1.4, 2nd paragraph under Alternative 2- Recommend rephrasing, this as FDOT's recommended alternative

P. 1.5, After Alternative 2 paragraph, added in the paragraph that Alt 1 is FDOT's alternative.

1.4 Major Environmental Impacts

P. 1.4-1.5 - Recommend adding a bullet on wildlife and habitat issues related to the project including federal threatened and endangered species requiring formal consultation with USFWS.

Section 1.4 – Added the following bullets:

Wetlands: Wetlands are present throughout the area and would be impacted by either alternative. The project would directly impact approximately 31 to 35 acres of wetlands of the nearly 57 acres of wetland located within Alternatives 1 and 2.

Federally Listed Species: Designated Critical Habitat for Gulf sturgeon and reticulated flatwoods salamander is present within the corridor and would

be impacted by the project. Formal consultation under ESA Section 7 will be required and is on-going.

Wildlife and wildlife habitat: Alternatives 1 and 2 would result in similar impacts to wildlife and habitat. Potential habitat in both corridors has undergone degradation through commercial forestry operations, rural development, commercial development, and utility easements. Alternative 2 would impact more sandhill habitat than Alternative 1 (83 vs. 57 acres), but most of this habitat is in planted pine. Both corridors traverse similar amounts of seepage slope (19.2 acres), basin swamp (8.9 acres), and bottomland forest (18.5 acres). Approximately 1 acre of dome swamp would be impacted by Alternative 1 but not Alternative 2. Portions of the project corridor, including most of the bottomland forest habitat will be bridged which will reduce potential impacts.

P. 1.5, sentence after 2nd bullet - States that there are no other “significant,” recommend that “major environmental impacts” be used. Suggest rewording.

Added: There are no other major environmental impacts associated with the proposed action. Additional discussion concerning other environmental consequences is included in Section 5.

1.6 List of Other Government Actions Required

P. 1.6- Is a bridge permit not needed from the USCG? There is no discussion of this in the DEIS. The USCG letter found in the correspondence appendix states that a USCG permit is not needed for this project if FHWA makes the determination that it meets the requirement for STAA. Has FHWA made this determination? If so please provide the documentation. Also please provide this letter in the Appendix of the DEIS.

Added: FHWA has made the determination that a bridge permit is not needed from the USCG. Reference Appendix A for letter and documentation.

P. 1.6- Mitigation – Suggest updating language to reflect that Section 373.4137, F.S. allows the department to “provide compensatory mitigation using mitigation banks and any other options that satisfy state and federal requirements.” Any references to “Senate Bill” should be deleted.

Added: Mitigation for unavoidable impacts can be accomplished under F.S. Section 373.4137, which allows FDOT to provide compensatory mitigation using mitigation banks and any other options that satisfy state and federal requirements.

1.7 Probable Adverse Environmental Effects Which Cannot Be Avoided

P. 1.6 - This section indicates that coordination with state and federal regulatory agencies will be required for wetland impacts. During this stage of the project, coordination with regulatory agencies should already be taken place. Please update this section to summarize these coordination efforts.

Updated to include 'Coordination is on-going with regulatory agencies with responsibilities for wetlands, including the USACE, FDEP, and NFWMD. Potential impacts have been estimated for each alternative alignment, but final impacts will be based on the final design and will be addressed during permitting. Several agencies, including FDEP, EPA, NFWMD, USFWS, NMFS, and USACE commented regarding potential wetland impacts, recommending minimization of wetland fill, avoidance of wetland areas, use of Best Management Practices, functional analysis of potentially impacted wetlands, and mitigation for unavoidable wetland impacts. These suggestions will be incorporated into the permitting and final design of the project'.

1.10 Short-Term Impacts Versus Long-Term Benefits

P. 1.9 - Please provide the date of the most recent Florida Statewide Regional Evacuation Study Program for the West Florida Region. Since the proposed alternatives include the construction of new bridges, please include more information about how the proposed alternative would improve current evacuation potential (such as whether these bridges will also be closed during high wind events, or will be constructed at lower bridge profile than those on SR 281 and CR 191, will there be any potential flooding impacts which would require closure of the new bridge(s), etc.). This section also stated that during evacuations, the SR 87S and US 90 intersection is listed as the most Critical Segments with Highest Queues in the Study. Please clarify what this means and which study so the information is clearer to the reader.

Updated section, added military information

P. 1.10 - This map is difficult to read due to the scale of the project study area. Recommend separating it out to be its own figure (Figure #) and illustrating it as a full page map.

Changed accordingly – Figure number 2.2

2. Introduction

2.1 Project Description

P. 2.1- Suggest adding that the study is being conducted by FDOT in coordination with FHWA as the lead federal agency. This DEIS is an FHWA document.

1st paragraph – changed accordingly

2.2 Purpose of and Need for Action

2.2.7 Planning Consistency

Suggest showing the interim bridge typical sections where you show the interim roadway sections in the documents, include proposed shoulder, lane width, etc.

Added bridge typicals

3. Alternatives Including the Proposed Action

3.1 Phase One: Conceptual Design Analysis

3.1.4 Construction Alternatives

P. 3.5, Figure 3.2 – The “SR 87 Connector Preliminary Corridors” map does a good job of depicting the segments that make up each corridor but the corridors themselves are not clearly identifiable on the map (only the segments). Could the map be revised to more clearly identify Corridors 1 through 6 or include a separate map just showing the corridors only then followed by the map showing the segment make-up of the corridors? It would also be helpful to the reader to more clearly see where all the proposed bridge crossings are for each corridor (such as using a separate color or symbol, and including it in legend).

Added updated map

P. 3.6- Description of Figure 3.3 – Noticed that the “weighting” value of each evaluation component was determined by consultant staff. Was FDOT or FHWA consulted about this methodology?

Added: This methodology of comparing corridors has been successfully used, in coordination with FDOT and FHWA, in obtaining Location Design and Concept Acceptance (LDCA) on over 15 PD&E studies throughout the state of Florida over the past 20 years.

P. 3.6 – Please explain how the ranking/weighting methodology was vetted. Was this methodology approved by FHWA? The four evaluation parameters indicated in the text is not entirely consistent with the tables shown in Figure 3.3, Page 3.7. Please review and revise wording to be more consistent with the figure.

The methodology used in the corridor analysis (Figure 3.3) was part of the Corridor Alternative Evaluation Summary Report, FDOT February 2011. The text was revised to be more explanatory.

P. 3.6-3.7, Figure 3.3 – The methodology, relative weights (or degrees of importance) assigned, and the scoring and ranking results on each evaluation parameter by the consultant’s team is unclear to the reader. There was not enough information provided in this section to explain and/or substantiate the results provided in Figure 3.3. For example, under “Environmental Rankings” in the figure, a score of “1” was given on T/E Species for Corridors 1 through 5 but a score of “6” for Corridor 6. Also, a score of “4”

was assigned on FFWCC 6-10 for Corridors 1-3, and a score of “1” for Corridors 4-6 but neither of these scores were discussed in the text.

Added: A rank of 1 reflects that the alternative is the best, while the higher numbers are reflective of less effective performances. If there is a tie, the corridors received the same rank, with the next highest score receiving the next available corridor ranking. For instance, under OFW in the Environmental Rankings, Corridors 4 - 6 included the same impact so all scored a ‘1’. Since three corridors scored a ‘1’, the next score available was a ‘4’. Likewise, Corridors 1-3 had the same impacts, they all scored a ‘4’ illustrating that all tied for 4th best Corridor.

It is also unclear how the amounts shown for construction costs were determined and specifically what costs were covered. For example, does the total estimated cost for each “corridor” include preliminary engineering, design, relocations, mitigation, etc.? Suggest beefing up this chapter to include this type of information and include a reference to the Corridor Alternatives Evaluation Summary Report. Also recommend including the date including the date of when the above-referenced report was approved by FHWA.

Added: “The methodology used in the corridor analysis (Figure 3.3) was part of the Corridor Alternative Evaluation Summary Report which was approved by FDOT February 17, 2011.”

Added: “while cost (construction and R/W) was the least important at 10%”

Added: Additional explanatory verbiage as requested.

P. 3.6, 2nd paragraph- Please state that FHWA approved the elimination of Corridors 4, 5, and 6 that were deemed fatally flawed, cite the documentation, and reference the meeting notes located in the Appendix G.

Added: Several design options were explored (e.g. – bridging the area, etc.) but the high cost ramifications were such that these options proved to be unfeasible by FHWA. FHWA correspondence added to Appendix A.

P. 3.6, 2nd paragraph - States that further coordination with FHWA has resulted in the removal of Corridor 3 from further consideration. Please add documentation of this coordination to Appendix G and reference it here. The information currently in the Appendix states that FHWA still wants to include Corridor 3. The BA states that in 2011 FDEP bought a tract of land for conservation and Corridor 3 was then eliminated. Please explain this here in the DEIS.

Added excerpt, Appendix A, added correspondence

3.2 Phase Two: Preliminary Alternative Evaluation

P. 3.10 - Weighting values of evaluation parameters. Why was the range from 4-13?
Seems random

Reworded: “Fourteen (14) different sub-criteria including engineering, socio-economic, environmental and cost factors were used. Each sub-criteria weight was assigned a weighted value depending on its degree of importance within the criterion, totaling the overall criterion number.”

The assigned criteria weights are not random but they reflect the relative importance assigned by the composite judgment of the evaluators. For example, in terms of the four major criteria (e.g. – engineering, environmental, socio-economic and cost) the engineering component was judged to have a relative importance of 31% in determining the ultimate selection of the preferred alternative (versus 25% for environmental; 29% for socio-economic and 15% for cost). The subcriteria weights again express their perceived relative importance and the total must add up to their corresponding major criterion category. For example, the sum of the traffic service (13%), safety (10%) and multimodal implications (8%) adds up to 31% which is the total for the engineering component. It is inherently clear that generally the greater the number of subcriteria used, the lower their relative value with respect to each other will be.

P.3.11 - The Preliminary Alternative Evaluation matrix is not legible and should be enlarged

Agree

3.3 Description of Alternative 1

P. 3.12- Appears to be missing a description of Alternative 2. Recommend this be included in order to compare the 2 alternatives.

Agree, added

4. Affected Environment

General

Recommend adding a new sub-section discussing existing and future land use. Some of the information from Section 5.1.3 Land Use could be moved over, as well as maps and figures.

The discussion of the “affected environment” in this DEIS is presented at a relatively high level lacking sufficient detail in proportion to the significance of the impacts. Descriptions of the affected environment should include discussion of ETAT

commentary as well as any scoping comments received through the AN, which are the basis of focusing the analysis of environmental issues.

Note: Added ETAT commentary throughout Section 4. Also added more detailed demographic information

4.1 Population and Community Characteristics

4.1.3 Existing Community Facilities

P. 4.3 – Government Facilities. What is HRS? If it is supposed to be for Health and Rehabilitative Services, that name and acronym no longer applies to that agency. If not, please spell out name before the acronym.

Agree, Added “Santa Rosa County Department of Health – Environmental Health Office”

4.5 Comprehensive Planning

P. 4.7- Suggest adding some of the planning consistency information from Section 2.2.7 Planning Consistency or reference it in this section.

Added: Section 2.2.7 Planning Consistency includes more information on the regional planning goals, agenda, and budget. Also added that the 2011 updated transportation maps and the updated 2014 SR County CIE includes this project.

4.6 Water Resources

P. 4.9, first half of the paragraph regarding EPA feedback- This discussion would be best moved to the Environmental Consequences section since it discusses project impacts.

Moved accordingly to section 5.4.5 Water Quality, second paragraph. Also added ETAT review information.

P. 4.9 - Suggest including the appropriate Florida Administrative Code for Outstanding Florida Waters.

Added: 62-302.700, F.A.C

4.7 Floodplains

P. 4.9- Recommend discussing and referencing the floodplains map in Appendix E.

Added the ETAT review and a reference to the Floodplain map.

4.8 Vegetation

P. 4.10, 2nd line in 1st paragraph – I think the word should be “alteration” instead of “alternation”.

P 4.10, Alternation is the correct term

P. 4.10 - Recommend listing the wetland FLUCCS types in the project area

Changed accordingly, Wetland classifications based on Florida Land Use, Cover and Forms Classification System (FLUCCS) include streams and waterways, wetland hardwood forests, wetland forested mixed, intermittent ponds and wetland shrub.

4.9 Wildlife and Habitat

P. 4.11 – Recommend moving the first paragraph down below the second paragraph and just prior to the paragraph discussing the reticulated flatwoods salamander critical habitat.

P. 4.15 – changed accordingly.

P. 4.11, Last paragraph- Suggest changing “under the Florida Administrative Code (FAC) 62-302.700” to “... under section 62-302.700, F.A.C.”

P. 4.15 – Changed accordingly.

This section indicates that a number of federally and state listed wildlife species have a potential for involvement in this project. Suggest including a summary of these species in this section as well as a table with the species list prepared for this project. Also suggest summarizing the listed plant species known to occur or have potential for involvement in this project.

P. 4.12 – Added: The USFWS documents the potential occurrence of approximately 79 federal and or state listed species in Santa Rosa County. This includes approximately 34 plant species, 17 avian species, four amphibians, ten reptiles, four mammals, and four freshwater mussels. Most of these species are state listed only. There are 17 federally listed species potentially occurring in Santa Rosa County, along with one candidate species (gopher tortoise), one species proposed for listing (Red Knot), and one species with special protection status (Bald Eagle). Table 4.2 shows the list of federal and state listed species potentially occurring in Santa Rosa County. Table 4.2 added.

5. Environmental Consequences

General Comments – Many of the comments the ETAT made during the ETDM screening are not incorporated or discussed in each issue area. It would benefit the discussion to include what the agency issues were and how they were addressed.

Added information throughout

P. 5.1- Recommend dropping the reference to the top ranked alternative and just state “the 2 alternatives”

P. 5.1 – Changed Accordingly

Since the location of stormwater ponds for each alternative is known for this project, please include their impacts in the impact assessment for all the issues in this section.

Section 5.4.8 Added: The recommended pond sites were chosen based on numerous factors: ground water table height, soil permeability, profile grade, pre-development outfall locations, minimizing wetland impacts, avoiding floodplains, parcel owners, minimizing distance to pipe runoff to each pond, and avoidance of threatened and endangered species and cultural resources. The off-site pond locations were also determined based on allowable hydraulics and headloss (how far stormwater could be piped). There are areas close to the Blackwater River where some potential pond sites are within the floodplain. These ponds are wet ponds which will require berms (some embankment) and ultimately would affect the floodplain. However, the project design proposes to provide floodplain compensation upstream of these areas to help alleviate any potential staging due to the fill related to the entire project. Detailed information on these pond sites can be found in the Pond Siting Report.

5.1 Social and Economic Impacts

5.1.1 Social Impacts

P. 5.1, second sentence- change “potentials” to “potential”.

Changed accordingly

5.1.2 Economic Impacts

P. 5.2 – Replace “contract” in last paragraph with other terminology.

Changed to Study

5.1.3 Land Use

Recommend moving the land use maps to the Existing Conditions section, and referencing them here.

Moved Land Use maps (figures 4.3 and 4.4) and information to 4.6 as requested.

P. 5.3 – Suggest including some background information about the Project Team and Team Santa Rosa (such as its members and purpose).

Cover Page (VI) – TEAM Santa Rosa and Project Team defined in Section 8.

5.1.6 Mobility

P. 5.10, second paragraph – suggest spelling out NOLF.

P 5.10 – Changed accordingly

5.2 Utilities and Railroads

5.2.1 Utilities

P. 5.11 – The intent of the last 2 sentences is confusing. Please review and reword as needed.

Adjusted Text to state: As the study progresses, continued coordination will take place with all pertinent utility companies. It should be noted that location information was collected for planning purposes and more detailed information may be needed prior to construction.

P. 5.12- Suggest spelling out WWTP

Changed accordingly

5.3 Cultural and Historical Resources

5.3.1 Archaeological and Historical Resources

Second paragraph - please state the purpose of conducting a phased approach to the CRM study by including the purpose of the CRPA and then discuss how it was phased into the completed CRAS. Provide the rationale for the phasing of the CRM study in the DEIS too. Please also, provide a copy of the FHWA and SHPO approval letters cited for the phasing of the CRM study. CRM studies cannot be phased without the concurrence of the lead Federal agency.

Cultural and Historical Resource - Added: A phased approach to the CRM study was done due to the scope and magnitude of the project area, and the alternatives being considered. The imposing APE's along with a large number of potential historic structures requiring evaluation, and documentation within the project's vicinity made it difficult to complete this CRAS in one phase. Background research preceded field survey (ACI 2010) and was summarized in a CRPA. The CRPA identified significant cultural resources within and around the proposed alternatives in order to assist and facilitate project planning associated with the PD&E study. The CRPA, which implemented background research, data analysis and reconnaissance surveys, identified the SR 1 Historic Trail (8SR1313) (NRHP) as the only critical cultural resource that would be impacted. This was then submitted to and approved by both the FHWA and the State Historic Preservation Officer (SHPO) (Kammerer 2011; Kendall 2011). Afterwards a full CRAS report was initiated and completed in order to evaluate the preferred alternatives. Appendix A (March 30, 2011) includes the approval correspondence for the phased approach.

Third paragraph - please cite and provide SHPO and FHWA concurrence with the CRAS findings.

Added in Appendix A, Correspondence

6th paragraph (third paragraph on page 5.15) - please discuss proposed plan for dealing with this resource if it occurs since we are not including it in our environmental considerations at this point. If we encounter such a resource we may need to reanalyze our alternatives, this should be stated so that all parties are aware.

Added to Section 5.3.3: If this resource is encountered along the proposed corridor then a reanalysis of the corridor as well as a water survey will be implemented.

10th paragraph (second paragraph on page 5.16) - will any right of way be acquired at this intersection that may bring any portion of the brick road which is not already contained within our right of way into Department right of way? It is my understanding that the entirety of the brick road is in the right of way for SR-90, but, unless I missed it, this is not stated. Please illustrate existing right of way and proposed right of way for this location on the map at the top illustration on page 5.18. Then provide a designation for this map and cite it in this paragraph to illustrate acquisition or non-acquisition of portions of this resource.

Added: A review by both the SHPO and FHWA determined that there was no acquisition of land required (See Appendix A), nor are there any adverse effects to the property, the crossing of the SR 1 Historic Trail and its associated improvements do not constitute a Section 4(f) action.

11th paragraph (third paragraph on page 5.16) - please cite the letters which provide the effect findings from FHWA and SHPO and include these letters for comments and coordination. Also, state whether there will be any removal of historic materials from the brick road.

Information included in 5.3.1 Archeological and Historical

P. 5.14 - When reading this discussion, would like to see a map showing where SR87 crosses the historic road. Recommend referencing the Figure on p. 5.18 here.

5.3.3 Section 4(f)

4th paragraph titled *SR 1 Historic Trail* (last paragraph page 5.17) - Refer to comment above regarding question of right of way. Please reference both the SHPO and FHWA opinions on Section 106 effects, provide a detailed description of proposed alterations

to the current brick road, and include a statement as to why Section 4(f) does not apply to our project in regard to this resource (i.e. there is no acquisition of land from this property nor are there any adverse effects to the property).

Included

5.4 Natural and Physical Impacts

5.4.2 Air

Consistent with the comment provided on the Air Quality Memorandum, please provide the worst-case one (1) and eight (8) hour CO concentrations compared to the NAAQS.

Added: The maximum CO concentrations predicted for the entire screening model occurred at the 2035 Build Alternative 2 where the concentration at one hour was 7.9 ppm and the eight-hour concentration was 4.7 ppm. This does not exceed the NAAQS standards of 35 ppm and 9 ppm for one-hour and eight-hour levels.

5.4.3 Noise

P. 5.21, 2nd and 3rd paragraphs - The discussion should contain the respective Noise Abatement Criteria (NAC) category (B, C, etc.) that is approached or exceeded.

Added Table and 'For the Design Year 2035 Build Alternative, noise levels are predicted to approach or exceed the NAC for Categories B (residential) and C (public institutional structures, recreational areas, trails, trail crossings, etc.). Detailed information is in Table 3.5 of the Noise Study Report'.

Consistent with Chapter 17 of The FDOT PD&E Manual, the "Statement of Likelihood" (similar to that on Page 25 of the Noise Study Report) shall be included in the environmental clearance document.

Added: The Florida Department of Transportation is committed to the construction of feasible and reasonable noise abatement measures at the noise-impacted locations identified in Table 3.6 and on Sheet 10 of Appendix B of the Noise Report (also summarized in Table 5.6), contingent upon the following conditions:

- 1. Detailed noise analyses during the final design process supports the need, feasibility, and reasonableness of providing abatement;**
- 2. Cost analysis indicates that the cost of the noise barrier(s) will not exceed the cost reasonable criterion;**
- 3. Community input supporting types, heights, and locations of the noise barrier(s) is provided to the District Office; and**

4. Safety and engineering aspects as related to the roadway user and the adjacent property owner have been reviewed and any conflicts or issues resolved.

If, during the final design phase, abatement is no longer considered feasible or reasonable for a given location, such determination will be made prior to requesting approval for construction advertisement. Commitments regarding the exact abatement measure locations, heights, and type (or approved alternatives) will be made during the final design phase and at a time before the construction advertisement is approved.

Table 5.6 Noise Barrier Analysis – Harvest Point Area

Barrier Height (ft.) /Width (ft.)	Number of Impacted Receptor Sites	Number of Sites w/Insertion Loss of (dB(A)):						Number of Benefited Sites	Cost Per Benefited Site
		5+	6+	7+	8+	9+	10+		
8/1601	17	15	0	0	0	0	0	0	N/A
10/1401	17	3	7	6	0	0	0	16	\$26,269
10/1601	17	2	9	6	0	0	0	17	\$28,253
12/1401	17	2	2	4	10	0	0	18	\$28,020
12/1601	17	2	2	1	14	0	0	19	\$30,335
14/1401	17	3	4	1	3	10	0	21	\$28,020
14/1601	17	11	5	0	2	13	0	31	\$21,691

5.4.4 Wetlands

P. 5.21 – Recommend deleting “Planning level” from second paragraph begin sentence with “Assessments of wetland and environmental resources...”.

Changed accordingly.

P. 5.24, UMAM – suggest changing sentences in third paragraph to read: “Wetland quality associated with alternative alignments was also assessed within each unique wetland habitat polygon using the Uniform Mitigation Assessment Methodology (UMAM) as define in Chapter 62-345, F.A.C. UMAM is currently used by the FDEP and WMDs and was also accepted as the wetland assessment methodology by the Jacksonville District of the USACE ...”

Added: Wetland quality associated with alternative alignments was also assessed within each unique wetland habitat polygon using the Uniform Mitigation Assessment Methodology (UMAM) as define in Chapter 62-345, F.A.C. UMAM is currently used by the FDEP and WMDs and was also accepted as the wetland assessment methodology by the Jacksonville District of the USACE via a Public Notice dated August 18, 2005.

P. 5.24, 3rd paragraph - Wetland maps are cited as being located in Appendix F. They are instead located in Appendix D. Recommend including an explanation of the maps in this section.

Updated and described in Section 5.4.4.

Please ensure that acreage impacts provided are consistent with those in the WER.

Verified (1st sentence of 9th paragraph, Sec. 5.4.4): There are approximately 57 acres of wetlands within the Alternative 1 alignment and approximately 56 acres of wetlands within the Alternative 2 alignment. Approximately 35 acres of wetlands within alignment 1 and 31 acres of wetlands within alignment 2 are proposed for direct impact. Approximately 22 acres are potentially proposed for shading in both alignments.

P. 5.25, 4th paragraph, Direct and Shading Impacts- Recommend identifying which agencies may require permits and mitigation.

P. 5.30, 1st paragraph, last sentence – Added: Permitting will be required for direct and indirect wetland impacts by the regulatory agencies with jurisdiction, primarily USACE and FDEP. The State and Federal agencies will exert jurisdiction over the wetlands and waters delineated within the alignment areas. Coordination with the regulatory agencies will continue through the design phase to evaluate permitting and mitigation requirements. The project is anticipated to require an Environmental Resource Permit (ERP) from the FDEP since Sovereign Submerged Lands are involved, and a Section 404 dredge and fill individual permit from the USACOE. This project will also require a National Pollution Discharge Elimination System (NPDES) permit from the U.S. Environmental Protection Agency (EPA) since one or more acres of land are proposed to be filled. The FDOT will coordinate with the FDEP, USACOE, EPA, National Marine Fisheries Service (NMFS), US Fish and Wildlife Service (USFWS), and the Florida Fish and Wildlife Conservation Commission (FFWCC) regarding potential impacts to wetlands and wildlife species.

P. 5.26, UMAM explanation – suggest moving this section to page 5.24 right before the discussion of wetland impacts.

Comment noted, but UMAM explanation retained in current location.

P. 5.32- This section needs more discussion on the conceptual mitigation plan. Please add more detail on the PBMB mitigation bank and other mitigation options discussed in the WER (p. 25) and state whether they have available credit.

Added as last paragraph of Section 5.4.4 (wetlands): One option for mitigation is the Pensacola Bay Mitigation Bank (PBMB), a 1,200 acre site located in Santa Rosa County that offers hardwood, pine flatwoods, and herbaceous wetlands credits. The PBMB was permitted using UMAM and as “like-for-like” credits available to offset potential alignment impacts. At the time of document preparation, credits for the PBMB were priced between \$25,000 and \$50,000 per credit and there were approximately 25 credits available for purchase. The restoration activities that are required to obtain credit release are continuing on the PBMB and it is anticipated that additional credits may be available as the project moves into the design and construction phases. The Interagency Review Team (IRT) will evaluate the available options to determine the most suitable mitigation during the permitting of the proposed alignment impacts.

P. 5.33- Suggest deleting sentence discussing Senate Bill 1986. Mitigation language from previous page appears to be adequate.

P. 5.33 removed accordingly.

Recommend combining Tables 1 and 2 of the WER (P. 10) into one table (in order to compare alternatives) and add to this section of the DEIS.

P. 5.36, Added the following to Section 5.4.4:
 The existing land use within the alternative alignments was classified using FLUCCS. The dominant existing land use in both alignments was Wetlands Forested Mix, Hardwood Coniferous-Mixed, Coniferous Plantations, and Rangeland. The acreage and percent of existing land use cover by FLUCCS category is summarized in the following tables. A figure is available in Appendix D.

Table 5.7. Approximate FLUCCS Land Covers within Alternatives 1 and 2.

FLUCCS Code	FLUCCS Level 3 Descriptor	ACRES	ACRES
1100	RESIDENTIAL, MEDIUM DENSITY <TWO-FIVE DWELLING UNITS PER ACRE>	0.0	1.4
1200	RESIDENTIAL, MEDIUM DENSITY <TWO-FIVE DWELLING UNITS PER ACRE>	1.5	1.2
1400	COMMERCIAL AND SERVICES	10.7	9.7
1500	INDUSTRIAL	2.7	0.0
2100	CROPLAND AND PASTURELAND	37.4	22.3
2200	TREE CROPS	5.9	0.0
3200	SHRUB AND BRUSHLAND	3.6	0.0

4100	UPLAND CONIFEROUS FORESTS	217.1	251.1
4200	UPLAND HARDWOOD FORESTS	3.6	3.6
4340	HARDWOOD - CONIFEROUS MIXED	109.3	88.1
4410	CONIFEROUS PLANTATIONS	51.0	108.6
4430	FOREST REGENERATION AREAS	0.0	46.6
5100	STREAMS AND WATERWAYS	6.7	6.7
6100	WETLAND HARDWOOD FORESTS	14.4	12.5
6300	WETLAND FORESTED MIXED	46.5	39.1
6530	INTERMITTENT PONDS	4.6	4.6
6310	WETLAND SHRUB	19.1	19.1
8320	ELECTRICAL POWER TRANSMISSION LINES	55.8	55.8

Also added:

The delineated jurisdictional wetlands were classified according to the NWI/ Classification of Wetlands and Deepwater Habitats of the United States (Cowardin, 1979) (Appendix E). The acreage of each wetland classified by NWI is shown in Table 5.8. Wetland habitats were classified using the Florida Natural Areas Inventory (FNAI, 2009) (Table 5.8). The wetland habitats were also classified according to FLUCFCS (see Table 5.7 above). Maps depicting delineated wetlands and NWI classification are shown in Appendix F.

Table 5.8. Wetlands Classification Based on NWI / Cowardin

NWI / Cowardin Classification	Alternative 1 (Acres)	Alternative 2 (Acres)
PF01/2F, Freshwater Forested/ Shrub Wetland	5.8	5.8
PF01F, Freshwater Forested/ Shrub Wetland	4.8	4.8
PF03C, Freshwater Forested/ Shrub Wetland	0.8	0.8
PF04/1B, Freshwater Forested/ Shrub Wetland	7.0	7.0
PSS1C, Freshwater Forested/ Shrub Wetland	0.4	0.5
PSS1F, Freshwater Forested/ Shrub Wetland	0.7	0.0
PF02/1F, Freshwater Forested/ Shrub Wetland	2.8	0.0
PF01/4C, Freshwater Forested/ Shrub Wetland	10.9	10.9
PF01C, Freshwater Forested/ Shrub Wetland	5.5	5.5
PF03/1C, Freshwater Forested/ Shrub Wetland	5.9	5.9
PSS1/3C, Freshwater Forested/ Shrub Wetland	0.6	0.6
PUBF, Freshwater Pond	0.3	0.3
R2UBH, Riverine	0.7	0.7

Table 5.9. Wetlands Classification Based on FNAI

FNAI Classification	Alternative 1 (Acres)	Alternative 2 (Acres)
Seepage Slope	23.48	23.23
Basin Swamp	10.28	10.28
Dome Swamp	1.43	0
Bottomland Forest	21.66	21.66

Recommend adding the table in the Conclusion section (Page 28) of the WER to this section of the DEIS

**P. 5.36, Added as last paragraph of Section 5.4.4:
 Both alignment alternatives will impact wetlands. The impacts and functional UMAM loss are summarized in the following table:**

Criteria	Alignment 1	Alignment 2
Direct Impact	34.64 Acres	30.62 Acres
Shading Impact	22.38 Acres	22.38 Acres
Indirect and Cumulative Impacts	139.40 Acres	134.01 Acres
Functional Loss (UMAM)	53.25 Units	50.60 Units

5.4.7 Contamination

P. 5.35, second paragraph - Please reference Figure 5.4 and move it before the Floodplains discussion

The Whiting Field Naval Air Station is a National Priorities List site. As a result the USEPA assigned Alternative 3 a ‘Moderate’ degree of effect, as this alternative was in close proximity to the air station. Although alternative 3 was not carried forward, a portion of alternative 2 seems to run within a mile of the southern boundary of the air station and is also down-gradient from the site. The CSER did not address this site so it is not known where the contamination occurred on this very large property. If the naval air base site is not a concern for alternative 2, due to the location of the contamination being greater than one (1) mile away, the CSER and the DEIS should mention or clarify this.

Added: It should be noted that Whiting Field NAS was included in the original July 2010 SR 87 Connector CSER, but was removed when Alternative #3 was dropped. It is now not a concern for the project due the location of contamination being greater than one (1) mile away from the remaining alternatives.

5.4.8 Floodplains

The Flood Plain Standard Statement found in the DEIS, PER and Flood Plains report states that the “changes have been reviewed by the appropriate regulatory authorities”. Is this a true statement?

Yes, the proposed design was reviewed by the District Drainage Engineer and the design development was in coordination with the Santa Rosa County Floodplain Manager, Karen Thornhill. We have requested formal documentation from Ms. Thornhill, and we have copies of electronic coordination.

5.4.10 Wildlife and Habitat

For the Gulf sturgeon and RFS, explain that these “may affect” determinations will be given a “likely to adversely affect” or “not likely to adversely affect” determination during formal consultation.

Please reference the figures in Appendix F and explain them in this section.

Recommend adding a figure to Appendix F showing natural wildlife habitat data (natural community FLUCCS, IWHRs) overlaid with the project alternatives.

Discuss the figure from P.4.6 and add it to Appendix F to show critical habitat. Recommend adding any bald eagle nests or FNAI occurrences to this figure.

This section should discuss indirect effects identified by the USFWS and FWC during the ETDM screening (fragmentation, roadkill, stormwater runoff, noise, light, potential for fire suppression, hydrologic alteration, the spread of exotic species, etc.). Also recommend referencing the discussion in Section 5.5.1 Indirect Impacts and update that section to include all of the above.

This section does not provide a comparison of wildlife and wildlife habitat impacts between alternatives. The only comparison provided is the number of GT burrows observed on each alternative. If all other wildlife impacts are the same between alternatives please explain this. If not please show the difference in table format.

One of the primary concerns with this project involve wildlife and habitat issues as discussed during the District 3/CEMO kick-off meeting to discuss this project and the Draft EIS. Overall, the information provided in this section does not appear sufficient to adequately evaluate the levels of environmental impacts associated with the alternatives presented. This section only provided a limited amount of specific information regarding these issues. This section should include more discussion of ETAT (USFWS, FWC – species of greatest conservation need, NMFS – indirect effects, FDEP on Critical Ecological Linkages, the Whiting Field Naval Air Station concerns about birdstrikes, etc.) considerations, coordination and/or consultation process that occurred concerning wildlife and habitat issues.

Both USFWS and FWC raised concerns about indirect and cumulative effects in the ETDM comments and requested information on vegetative community/FLUCCS types, habitats, and conservation areas as related to federally and state listed wildlife and plant species which were not addressed or provided in this section. It is recommended the ESBA include details on types of vegetative communities/habitats that each listed plant and/or wildlife species are found in. Basis of determination of effect should be based on habitat analysis (i.e., “this species was not observed during the field surveys and the probability of occurrence is low due to the absence of available habitat within the [X] alternative”). This section should also be updated to include information about Strategic Habitat Conservation Areas, Biodiversity Hot Spots, conservation and wildlife habitat priority lands as identified by FNAI and FWC’s Integrated Wildlife Habitat Ranking

System, and other specific data as described in the Corridor Analysis Report prepared for this project as well as in the ETAT commentaries on wildlife and habitat resources.

Please include information on how the species list was determined and how the wildlife and habitat assessment was conducted including how/when surveys were done, what resources were used to develop the list, conduct surveys, and prepare the wildlife and habitat assessment, the methodologies employed, surveys remaining to be conducted for specific species, and discuss wildlife connectivity issues in this section since this is a high priority issue in this area. In addition, please reference and explain the rationale for the ESBA and BA, the requirement for formal consultation, including documentation of agency coordination or where to locate this documentation.

Section 5.4.10 was revised extensively to address many of the comments above.

P. 5.40 – 1st paragraph, 1st sentence contains erroneous rule citations. Section 7(c) of the federal Endangered Species Act is not amended by the state of Florida rules of the Wildlife Code as indicated. In addition, the rules cited (rules of Chapter 39, F.A.C.) have been repealed and replaced by Chapter 68A-27, F.A.C. Please revise accordingly. In addition, please delete “Wildlife Code”.

Changed Accordingly: This project has been evaluated for potential impacts to threatened and endangered species in accordance with Section 7(c) of the Endangered Species Act of 1973 and Chapter 68A-27 of the State of Florida (F.A.C.). A separate Endangered Species Biological Assessment (ESBA) Report, dated September 5, 2013 has been prepared for the project and was submitted to the USFWS for their review and concurrence of determination of effect.

P. 5.40 – 1st paragraph, 2nd sentence indicates that the Endangered Species Biological Assessment (ESBA) was submitted for their review and a determination of effect. The “action agency” (FHWA/FDOT) for this project is the agency making the determination of effect. Please revise sentence to state “... submitted for their review and concurrence of effect determinations”.

Revised Accordingly.

P. 5.40 - There is limited discussion on wildlife habitat. Please explain what is meant by “distinct” plant communities. Please show these areas on a map in the Appendix. Will one alternative impact more of these “distinct” plant communities than another? Are there other FLUCCS types in the project that provide habitat for listed species and how do these compare for each alternative?

Please see revised Section 5.4.10. Distinct plant communities was revised to natural ecological communities.

P. 5.40 - Reference to the Sept 5, 2012 ESBA in Appendix G. The BA should not be included in the Appendix, only as an accompanying Technical Report, however do include the correspondence from Appendix A of the report.

Removed and changed accordingly.

The issues of concern mentioned by the Naval Air Station in the ETDM comments were not addressed. There should be some discussion of coordination with them regarding mitigation strategies, stormwater retention, bird monitoring, mowing schedule to reduce bird strike hazards, etc. as discussed in their ETDM comments.

Section 4.6 Land Use was revised to include the Navy comments.

This section should include more information tying conservation lands and wildlife habitat. Discussion of current and future conservation areas as they relate to wildlife habitat connectivity and the 2 alternative locations may further back the preferred alternative 1. It is not addressed or recognized that the USFWS ETDM comments stated that Corridor 2 and 3 diminish the conservation value of proposed conservation land and may facilitate growth near the air station.

There are a lot of unanswered questions about the wildlife and habitat assessment done for this section. How was the assessment done, when and for what species were surveys done, what habitats were surveyed? What data was used? A lot of this information is in the ESBA, yet should be summarized here.

Section 5.4.10 has been updated.

P. 5.40 through 5.4.48 – General comment - Please recheck and update the “State Status” listing designations as needed to comply with the new FFWCC Threatened and Endangered Species Listing Process rule (Chapter 68A-27, F.A.C., effective as of October 2010).

Listing status checked and updated. A table has been provided in Section 4.10.

P. 5.43 – Please update the information on freshwater mussels. The “eight additional species are proposed for listing under the ESA...” . The listings for these species were recently approved and no longer proposed.

Section 5.4.10 – Changed accordingly.

P. 5.44 – Please note that the FWC has recently changed their position regarding encouraging the relocation of commensal species from gopher tortoise borrows. Suggest rewording that FDOT will coordinate with FWC on addressing any commensal species found during relocations.

Section 5.4.10 – Changed accordingly.

P. 5.44 – Please note that FWC recently delisted the Florida black bear and is no longer listed as a threatened species. Recommend deleting that sentence but keeping the rest of the paragraph.

Section 5.4.10 – Changed accordingly.

Please note that in addition to compliance with the most recent guidance issued by the U.S. Fish and Wildlife Service (USFWS) relating to potential involvement with bald eagles, that compliance with the Florida Fish and Wildlife Conservation Commission's (FWC) Bald Eagle Management Plan and Bald Eagle Permitting Guidelines are also required. Please revise this section to document these requirements.

Section 5.4.10 – Changed accordingly.

Include information from P. 19, D. Anticipated Impacts of the ESBA to assist with comparison of the alternatives

Section 5.4.10 has been updated to more specifically describe potential impacts to wildlife habitat.

P. 20, 3. RFS CH of the ESBA states that FDOT is approaching a private landowner to acquire one of breeding pond areas for FS. Please add this to the DEIS.

Acquisition of the RFS critical habitat property by FDOT is no longer an option. It is understood that the property owner does not want to sell the property.

Please add Figure 2, Florida Elemental Occurrences Map of the ESBA to the Appendix and add an explanation of the data in this section

Added in Section 5.4.10.

Recommend combining Table 2 and 3 of the BA (P. 15) into one table (in order to compare alternatives) and include them in this section of the DEIS.

Added in Section 5.4.10 as well as in Wetland Section.

5.4.9 Coastal Zone Consistency

P. 5.40, Include the page documenting the consistency determination in the Appendix and reference it here.

Referenced in Appendix.

5.4.11 Essential Fish Habitat

P. 5.48, first paragraph- The PD&E Manual reference should be Part 2, Chapter 11. In this section may also want to mention NMFS comments on the EST. That alternative 1 will not directly impact NMFS trust resources. Also may want to state that stormwater treatment systems will be designed to prevent degraded waters from reaching estuarine and marine habitats to address their concerns.

Revised Text: The Magnuson-Stevens Fishery Conservation and Management Act requires federal agencies to consult with the National Marine Fisheries Service (NMFS) on actions that are authorized, funded, or undertaken that may adversely affect Essential Fish Habitat (EFH). EFH evaluations are also required as a component of the PD&E process in accordance with Part 2, Chapter 11 of the PD&E Manual.

EFH is defined as waters and substrate necessary for fishery species to spawn, breed, forage, and grow to maturity. An adverse effect would be any impact that reduces the quality and/or quantity of EFH. Consultation for EFH is triggered when an action may adversely affect EFH; otherwise, no consultation is required. A review of NMFS's EFH Mapper (http://sharpfin.nmfs.noaa.gov/website/EFH_Mapper/map.aspx) indicates that EFH is not present in the project area. The nearest mapped EFH is located approximately 3.1 miles downstream from the project area and corresponds with the approximate limits of tidal influence.

Any potential downstream impacts would be minimized through the use of bridges and erosion control measures. In summary, the SR 87 project would not have an adverse effect on EFH. NMFS reviewed the proposed location for Alternatives 1 and 2 as part of the program screening through the ETDM process and indicated that the project would not directly impact NMFS trust resources. In addition, due to the OFW requirements, the stormwater systems will be designed to prevent degraded waters from reaching estuarine and marine habitats.

Added information on Naval Air Station Whiting Field concerns on bird strikes, as well as preventive methods to minimize environmental impacts during construction processes to Section 4.6, Land Use.

5.4.12 Farmlands

P. 5.48 - Include the farmlands assessment in the Appendix and reference it here.

Results/Tables from assessment added, Appendix includes documentation.

5.5 Cumulative Impacts

P. 5.51, first paragraph – There is no difference between indirect and secondary impacts (as mentioned in the next sub-section). The term secondary should not be used to avoid confusion.

Entire document – Changed accordingly.

5.5.2 Cumulative Impacts

P. 5.52 – Please discuss the projects that have taken place in the area or that are reasonably expected to occur. These are mentioned, but not discussed in detail, nor do we know their location in relation to the project area. Please follow FDOT's CEE guidance.

Section 1.2: The following table summarizes the construction projects in the vicinity of the project study area as per the Florida-Alabama Transportation Improvement Program (TIP), amended April 2012. It should be noted that many of these projects are minor and are occurring outside of the study area, and would not impact the proposed action of this project.

Added to 5.5.2: The construction projects outlined in Section 1.2 will not provide any additional capacity to the roadways within the study area and will not assist the roadway network in supporting the growth in the area. In addition, there are planned projects for widening on SR 87 just north of Whiting Field. This may put more pressure on the need for this new corridor. Those widening projects are not currently funded in the FDOT District 3 Work Program.

Most of the lands surrounding the project are privately owned pine plantation. Analysis and discussion is needed to explain effects that may occur.

This is not necessarily true after a review of the property owners. However, the Farmlands coordination documentation has now been included as an Appendix.

P. 5.52, last paragraph – Please discuss access in common terms. The public is not going to know what Class 3 and Class 5 access classifications are.

The SR 87 Connector is proposed to be a divided highway. The proposed access management for the resulting alternatives was determined to include a restrictive median with full median openings spaced at ½ mile, directional openings spaced at ¼ mile and limited driveway/side street connections (Access Class 3). These restrictions will assist in the reduction of potential urban sprawl in the location of the conservation areas adjacent to Whiting Field.

6. Comments and Coordination

Recommend adding a section that discusses the ETDM Screening Events. See Part 2, Chapter 31, Comments and Coordination. This could easily be combined with the Advance Notification section.

Added to 6.2: The Florida Department of Transportation utilizes the ETDM process to accomplish major transportation project planning with early and continuous coordination with agencies. ETDM is carried out through the use of the Environmental Screening Tool (EST). The EST is a web based interactive database and mapping application that integrates a database of projects with over 550 environmental GIS data layers, an automated environmental screening analysis application, and multiple tools for entry, review, and reporting. The EST includes two screens, a Planning and Programming Screen. The Planning screen is the initial step in the project development process when projects are being considered for inclusion or prioritization within the cost feasible elements of the LRTP. For this project, it was for inclusion in the West Florida Regional Planning Council LRTP. The Programming Screen follows the Planning screen and initiates the Advance Notification (AN) process. Through this process, federal, state, autonomous regional and local agencies and other interested parties are informed of the existence of this project and its scope.

6.2 Advance Notification

P. 6.4 – Are the responses to the agencies the ETDM Coordinators Summary? Please clarify.

Added: The summary report includes the responses to the agencies as the ‘Coordinators Summary’ for each item evaluated.

6.3 Interagency Coordination

P. 6.4, first sentence – Please correct the statement that 6 build alternatives were advanced through the PD&E evaluation process. Only 2 were studied during PD&E.

Changed accordingly.

This section should also include any agency letters received on the project and FDOT’s response

Included in Correspondence.

7. Commitments and Recommendations

7.1 Commitments

Add that a site-specific survey will be conducted to determine the presence or absence of bald eagle nests in or near the construction zone. This was stated on P. 5.45, 2nd paragraph.

P. 7.1, last bullet – Changed accordingly.

Appendices

Appendix A- ETDM Summary Report

This section needs an introduction to ETDM to discuss how the ETDM alternatives relate to Alternatives 1 and 2 of the PD&E Study. Do they have the same alternative numbers? This is hard to tell from the alternative description on page 2 of the report.

The Project Description and information is in the final version now Appendix B.

The DEIS provided included a draft ETDM report. Please include the final report prior to submitting to FHWA for review

Updated.

In the BA it states that the summary report was completed and published on May 12, 2010. The summary report in the DEIS a draft that is dated April 2012. Please provide the finalized, or most up to date version of the summary report in the DEIS.

The BA was removed.

ETDM comments show inconsistency with the SRC Comp Plan, yet Section 2.2.7 states that it is consistent. Please include any correspondence that may bridge the gap in Appendix G, or discuss when it was added to the plan in Section 2.2.7.

Included.

Appendix B- Planning Consistency Form

Please attach copies the actual pages of the STIP and other long range planning documents to Appendix B of the DEIS, the same as was included in Appendix B of the PER

Included.

Appendix D- Wetland Exhibit

The third map in Appendix D of the DEIS has no label

Updated

Appendix F- Wildlife Exhibit

Include the figure from P. 4.6 here with requested modifications.

Appendix F was entirely updated.

Figure 4 - It would be helpful if the figures showed the bridge location so you can see what listed plants may be spanned by the bridge and which ones may be directly impacted.

A map depicting bridge locations is included now as Figure 3.2.

Appendix G- Correspondence

Please remove the BA from the document. It should only be included as an accompanying Technical Report. Include the correspondence included in Appendix A of the report.

Updated.

The coordination documents in this section do not show that FHWA approves the elimination of alternative 3. Please add updated coordination showing their approval of its elimination.

Updated.

Appendix H- Public Involvement Program

The Public Involvement Plan included in Appendix H of the DEIS did not have any FDOT approval signatures.

Updated.

ESBA September 2011 **Updated Document**

General

Is this the latest draft of the ESBA? The BA states that the ESBAR was finalized in March 2012. This version has not been updated with information from the BA.

It is very confusing to have an ESBA and a BA as a separate document. The difference between these two should be clearly explained in the DEIS. The information in the ESBA and DEIS is typically consistent, with the ESBA showing the details of the research provided in the DEIS

This report does not support the conclusions made in the DEIS and seems to be more of a summary rather than an in depth technical report

This report should provide more information on species that were not observed in the area, but that may be there due to habitat. I do not feel that there is documentation to justify that there will be no effect on these species.

This report is lacking information for which to compare alternatives on impacts to wildlife habitat.

P. 6, 1st paragraph – Delete “and included in the ESBA report”, this is the ESBA report.

P. 6, Table A1 – Please provide an explanation of which of these soil types provides good habitat for gopher tortoises. What does this data mean?

P. 7, 2. Plant Communities – It is not clear why only these plant communities are discussed. As a technical report this should provide background on all the communities and FLUCCS types within the project area.

P. 11, Table B. – Please provide the acreage within each alternative’s footprint.

P. 19, D. Anticipated Impacts – Recommend adding this information to the DEIS to assist with comparison of the alternatives

P. 20, 2. Gulf Sturgeon CH – States construction of the bridge will be during non-migratory times of the year, while the DEIS states during spawning. Is this the same timeframe?

P. 20, 3. RFS CH – States that FDOT is approaching a private landowner to acquire one of breeding pond areas. Please add this to the DEIS.

Figure 2, Florida Elemental Occurrences Map – Please add this figure and an explanation of the data to the DEIS

Biological Assessment **Updated Document**

P. 15, Table 2 and 3 - Recommend combining these into one table (in order to compare alternatives) and include them in the DEIS and ESBA.

P. 17, First paragraph – Add the description of DEP coordination and how in 2011 FDEP bought the Whiting Field tract and Corridor 3 was eliminated to the DEIS.

It states that the summary report was completed and published on May 12, 2010. Why is the summary report in the DEIS a draft Preliminary Programming Screen Summary Report that is dated April 2012? Please provide the finalized, or most up to date version of the summary report in the DEIS.

P.18, States that the ESBAR was finalized in March 2012. The version CEMO was given to review states September 2011. CEMO should be provided the most up to date technical report to review.

States the WER was finalized in May 2012, CEMO was provided an April 2012 version. CEMO should be provided the most up to date technical report to review.

Wetland Evaluation Report April 2012 **Updated Document**

The BA states that the WER was finalized in May 2012. CEMO was provided an April 2012 version. CEMO should be provided the most up to date technical report to review.

P. 2, third paragraph – Please update and exclude Senate Bill terminology

P. 9- suggest adding a reference to Part 2, Chapter 18 of the PD&E Manual – Wetlands and Other Surface Waters

P. 10, - Recommend combining Tables 1 and 2 into one table (in order to compare alternatives) and add to the DEIS.

P. 12, E. – Are these areas of impact or areas within the alternative alignment? Please clarify.

P. 14, F.1. – Please state the names of the agencies requiring permits

P. 25 – please delete any references to Senate Bill 1986. The current terminology is to reference Section 373.4137, F.S. This statute allows the FDOT to provide mitigation “to offset the adverse effects of these transportation projects be funded by the Department

of Transportation and be carried out by the use of mitigation banks and any other mitigation options that satisfy state and federal requirements.” The statute was revised in 2012 to allow the Department to use any option available that meets state and federal requirements. The Senate Bill no longer refers to use of WMDs exclusively. Also, in item 2. Suggest changing the heading of “Senate Bill 1986” to NFWFMD mitigation.

P. 25, second paragraph, 1. PBMB – Add the info on this mitigation bank to the Wetland section of the DEIS

P. 25, third paragraph – Please give this another title than Senate Bill 1986

P. 27 – The letter states that a USCG permit is not needed for this project if FHWA makes the determination that it meets the requirement for STAA. The Department needs to work with FHWA to determine that the Blackwater River meets the criteria for the STAA. Please include this coordination/documentation in the DEIS.

Air Quality Memorandum (Dated October 2, 2012)

Page 1, First paragraph: In the last sentence, “zone” should be replaced with “zoned”.

“zone” has been replaced with “zoned” on page 1.

Please reference Chapter 16 (Air Quality) of the FDOT PD&E Manual

Reference to Chapter 16 of the PD&E manual has been added as the 2nd paragraph to paragraph 3.

The memorandum references the FDOT’s CO Florida 2004 screening model. A newer, updated version of that model (CO Florida 2012) was released in 2012. Suggest updating using the most recent version of the screening model, or providing justification as to why the older version was used.

The project has been updated using the 2012 screening model. The 2012 modeling output sheets are attached to the memo.

On page 2 of the memorandum, please include a table showing the predicted worst-case one (1) and eight (8) hour CO concentrations when compared to the NAAQS. Otherwise, the reader has to scroll through the model output sheets to find the results of the screening analysis.

A table (Table 1) has been added on the 2nd page showing a summary of the predicted worst-case 1- and 8-hour CO concentrations.

Noise Study Report (Dated October 23, 2012)

Page 3, Section 1.1.5: In the first sentence, “Level of Service” is spelled out, with the acronym LOS following, however, LOS is already used on the previous page (Section 1.1).

LOS was not spelled out on page 2 (Section 1.1). Section 1.1 has been revised to spell out LOS and Section 1.1.5 has been revised to remove the spelling out and just show LOS.

Page 9, Table 3-2: Please add a footnote/reference to the “Dn” column that explains what the letters N, S, E and W following the distance refer to. While the reviewer understands/assumes that it indicates the direction, others reviewing the document may not.

The N, S, E, & W have been spelled out under footnote⁴ DN.

Why are vacant lands included in the analysis? Have building permits been issued for individual structures on each of those parcels? If so, then that should be detailed in the text. If no building permit has been issued, no analysis is necessary. The design phase analysis shall also include a review of any building permits that may have been issued after the completion of the noise study but prior to FHWA approval of the environmental document.

The project corridor contains many parcels that are zoned residential that have structures (vacant residences, fallen down structures, barns/sheds, etc.), have been scraped/cleared for house construction, or are within subdivisions that has residential construction occurring. A current review of recent aerials and the property appraisers’ information has been reviewed again to determine the current status of building (residences) approvals. Because of this review, the following receptor sites have been updated:

R10 – the structure on the property is not a residence (probably a barn or shed). Therefore, this receptor has been eliminated.

R35 – there is a small mobile home on the property that is vacant. The word ‘vacant’ has been removed from the tables.

R37 – there is a structure (small residence) on the property that is vacant. The word ‘vacant’ has been removed from the tables.

R47, 60, 61, 62, 69, 70, 84, 85, 87, & 96 – These lands are vacant and no structure can be found on the aerials or in the field, even though the property appraiser lists the lands as residential, vacant. Therefore, they have been removed from the analysis and deleted from the tables and maps.

R64, 80, & 98 – These lands were vacant and/or were cleared for development in 2012 but currently have houses built on the land. Therefore, the word ‘vacant’ has been removed from the tables.

R74, 83, 86, & 89 – These receptors represent several residences that were combined for modeling. The lands were vacant and/or were cleared for development in 2012 but currently have at least one house built on the land. Therefore, the word ‘vacant’ has been removed from the tables.

R108 – In 2012 this parcel contained a foundation for a house that appears to have been removed at the time. Currently, the property appraiser indicates that there is a residence at this location. The word ‘vacant’ has been removed from the tables.

R115 – there is a stable located at this site. The land has been cleared and it appears that additional structures (residences?) were historically on the site. In addition, the property appraiser indicates that this land is residential but vacant. Therefore, the word ‘vacant’ has been removed from the tables.

With these revisions Tables 3.2 and 3.5 and Appendix B maps have been revised to reflect the results of the recent review and updated analysis. In addition, the word ‘vacant’ has been deleted from the text.

Page 16, Table 3-4 and associated discussion: Please provide the date, time, and monitoring period duration for the measurements used to determine the existing condition. Additionally, it is not clear to the reviewer which existing monitoring site data was used to represent the existing conditions at respective receptors, vs. when TNM-modeled existing noise levels were used.

The date, time, and monitoring period duration for the measurements used to determine the existing condition has been added to Table 3-4. In addition, a paragraph has been added on page 16 to explain what existing noise levels were used for the receptor sites.

Page 16, Section 3.3: Do any of the commercial land uses identified along the project corridor contain exterior areas of frequent human use that should be included in the analysis? If so (or if not), that should be explained in the text.

There were no commercial or industrial sites along the project that contained areas of frequent human use. Therefore, commercial and industrial were deleted as a noise sensitive land uses and the following sentence was added on page 16: “No industrial or commercial sites with frequent human use are located adjacent to the project corridor.”

Page 20, third bullet item: Please include the current unit cost (\$30/ft²) that was used to estimate total barrier cost.

The unit cost of \$30/ft² was added to the third bullet on page 20.

Page 21, Discussion of barrier analysis for receptor R10 (NSA 2): Per FDOT policy, a noise barrier must benefit two (2) or more impacted receptors to be considered feasible. If receptor R10 is the only impacted receptor being evaluated, than no barrier analysis is necessary (i.e.: an isolated impact). It appears this comment can also be applied to the barrier discussions for receptors R17, R34, R39, and R42.

R10 is not a noise sensitive receptor and has been deleted from the noise analysis. For R17, R34, R39, and R42 a statement indicating that the barrier does not benefit two or more impacted receptors has been added.

Page 21, Discussion of barrier analysis for receptor R11: Since this barrier was evaluated using the “Special Land Use Methodology”, please state the assumptions or actual usage data for the special use facility that was used to determine the unreasonableness of the barrier.

Information used in the special land use method has been added to the discussion.

Page 22, Discussion of barrier analysis for receptors R48, R49, and R50: Why were only three barrier heights (12, 14, and 16 feet) evaluated? Are there design/engineering limitations that preclude evaluating different heights? If so, they should be detailed in the text.

As shown on Table 3.6, five barrier heights (8, 10, 12, 14, & 16) were evaluated for these receptors. The text only discusses the heights (12, 14, & 16) that provided at least a 7 decibel reduction.

Page 23, Discussion of barrier analysis for receptors R79, R80, R81, R89, R90, R98, and R99: The same comment as above applies. Why were only those barrier heights (10, 12, and 14 feet) evaluated? Could additional heights above 14 feet provide a benefit to additional impacted receptors?

An additional barrier analysis has been performed for these receptors for barrier heights of 16, 18, 20, and 22 feet. This information has been added in Table 3.6 and the write-up for these receptors.

Page 23, Discussion of barrier analysis for receptor R106: Are there any improvements to SR 87N being made as a part of this project, or is the realignment of Season Drive a part of this project? If so, then a barrier analysis is warranted and should be stated. However, the site is an isolated impact so the previous comments concerning isolated impacts will apply.

This noise study did not anticipate any improvements to SR 87N. However, Season Drive is proposed to be realigned west of SR 87N. Therefore, a noise barrier analysis has been conducted for this receptor. This analysis

has been added to Table 3.6 and the text for this receptor, similar to other isolated impact areas.

Page 26, Section 5.0 Construction Noise and Vibration: This section should be improved to better reflect the requirements of Section **17-9 CONSTRUCTION NOISE AND VIBRATION IMPACTS** of Part 2 Chapter 17 of the PD&E Manual specifically the following:

“The early identification of potential construction noise and/or vibration impacts that may result from the construction of the project is important. Any potential construction noise or vibration impacts that are identified in the PD&E phase shall be documented in the **NSR** and in the environmental clearance document, along with any identified abatement measures that are potentially feasible and reasonable. A list of example construction noise and vibration sensitive receptors has been developed and can be found in **Table 17.3**. This will allow avoidance and/or mitigation options to be developed during the final design phase. These options can then be placed in the construction plans and applied during the construction of the project by the Contractor.” Just referring to the standard specifications is not sufficient anymore.

This paragraph has been added to Section 5.0.

Page 27, Figure 6 “Noise Contours”: Why are there different noise contour distances for each side of the roadway? The peak traffic should be modeled on each side of the roadway (not simultaneously) to arrive at the worst case predicted traffic noise level/contour distance.

Figure 27 has been revised to show the worst-case noise contour which is the same on each side of the roadway.

Appendix A “Traffic Data”: Please highlight the volume (LOS C or Demand) that was used in the analysis for each of the roadways/roadway segments.

The volumes (LOS C) used in the analysis has been highlighted and noted in Appendix A Traffic Data table.

Appendix D “TNM Model Inputs/Output: A quick review of the TNM input/output provided in Appendix D indicates that roadway shoulders were not modeled and that roadways do not overlap, per FHWA guidance. Also, the default “Height Above Ground” value of 4.92 feet for TNM Receivers should be changed to 5.0 feet. Additionally, per Chapter 17 of the FDOT PD&E Manual (Section 17-8.1), TNM input/output sheets should not be included in the NSR.

The TNM noise modeling has been updated to add roadway shoulders to the proposed SR 87 Connector, to add additional width to the roads so that they overlap, and to increase the receptor height to 5.0 feet. The tables and

text reflect these changes. TNM input/output sheets have been deleted from the NSR.

Pond Siting Report

In Section 4 I would suggest adding information about the storage volume needed in the basins.

The estimated required storage volume has been included in the write up for each individual basin in Section 4. These volumes were calculated by adding the estimated attenuation volume to the estimated treatment volume, per FDOT's Stormwater Management Facility Handbook dated January 2004.

Access Management Study

In the Access Management Study - The typical sections used did not match those in the DEIS or the PER. In the Access Management study the typical sections showed a suburban typical and not a rural typical.

The Access Management Study has been updated to include the latest urban and rural typical sections for the interim and full build out options.

SR 87 Determination of Applicability for Section 4(f)

I have no comments on this document. However, we do need a record somewhere as to whether our action in relation to the historic brick road does not constitute a Section 4(f) use of that historic resource. It would not be in this appendix, but this seemed to be an appropriate moment to reiterate this issue.

Added information in Correspondence Appendix of DEIS.

Cultural Resources Probability Assessment

The use of this document needs to be clarified. The CRM narrative in the DEIS addresses the cultural resources survey, identification and evaluation, as well as the effects discussions as completed and concurred with by FHWA and SHPO (except for the potential for underwater resources). However, the DEIS only contains this probability assessment and its findings. Statements in the Probability Assessment reference the need for archaeological testing in several high probability areas. Reference is made in Section 5.3 of the DEIS to a completed CRAS, but this document only contains the probability assessments for archaeological resources. Please clarify

the status of the testing more clearly. Also, Section 5.3 states that FHWA and SHPO have concurred with the CRAS for this project, the only actual concurrence cited in the report is for this probability assessment. In addition, the DEIS states that effects determinations have been made for the Red Brick Road and that SHPO and FHWA agree that there is no adverse effect to this resource. However, there are no letters cited or included which show this. Please clarify the reasons for the phased approach as well as a description on how the phased approach was completed along with the appropriate supporting documents.

This leads to several questions such as (1) whether or not the probability assessment was followed up with a complete field assessment, (2) whether or not further assessment was needed based upon the proposed activities, (3) whether archaeological testing will be conducted between the DEIS and the FEIS (4) if archaeological testing was initiated, why was it not included with this package, and (5) why are the approvals for the probability assessment by FHWA referenced and cited in the DEIS but there are no such references or citations of the ultimate CRAS findings despite a statement that such concurrence was given? The narrative needs to clarify these issues.

#12597 SR 87 Connector- Purpose and Need Sheet **Updated**

On the cover sheet) some editorial work needs to be completed: on the third line of first full paragraph, remove the word “for” from “to provide for a”

On the second and third lines of the third paragraph: “resident’s” should be plural not possessive. Also, remove the word “Unfortunately.” In other places of the document, please edit for clarity and avoid split infinitives as they can cloud the meanings of the sentences and make your points unclear to public readers.

FHWA Comments SR 87 Connector, DEIS review, from US 90 to SR 87 North		
Comment # (color code)	Comment topic and reference (e.g.; ENGR, p. 47, tab. 4-11): Page (p.) / Section (s.) / Paragraph (par.)/ Figure (Fig.)/ Table (Tab.)	<p>Directions: Please add a row below the comment and respond to the comment with specific response location as well as information regarding changes made in document(s). Please use the abbreviations provided to indicate the location(s) of changes made in the document.</p> <p>Date DEIS received by FHWA/review started:</p> <p>Date transmitted to District:</p> <p>Date responses/comments received from District:</p> <p>Date FHWA approved document for public review:</p> <p>Orange = critical to meet minimum requirements, Yellow = enhances document, Blue = editorial comment.</p>
1	General comment, Section 1.1, page 1.1, third paragraph	Should the third paragraph be expanded to include safety as an objective of the project. If this is acceptable, please also incorporate 'safety' into the discussion in Section 2.2.
	Response	Added, "In addition, the project will reduce traffic congestion within the City of Milton, improving safety and reducing travel demand on the section of US 90 currently shared with SR 87" to the third paragraph. Safety is section 2.2.6.
2	General comment, Section 1.1, page 1.2, first paragraph	The following sentence should be expanded and clarified in the document, "In addition, the Beltway Project was also studied by the Turnpike Enterprise.' What was their conclusion relating to the beltway project? Is it supported? Please expand this discussion.
	Response	The following was added for clarification: The results of the Turnpike study showed that the Beltway would be 20-30% feasible overall. The only segment that was determined to be feasible was the segment in this project's study area. The remaining portion of the Beltway project, from SR 87N to US 29 in Escambia County, remains in the TPO's LRTP Needs Plan (outside 2035). The following is a statement from the LRTP, "While the need for this project (Beltway) is beyond 2035 it was included in the LRTP as a regionally significant project that will serve as a limited access alternate to US 90 through Santa Rosa and Escambia Counties".
3	General comment, Section 1.3, page 1.4, second paragraph	The document needs to be expanded to discuss the existing and future traffic levels of service for the proposed project; existing, opening and design year.
	Response	Updated the paragraph to be more descriptive: "SR 87 Connector is projected to carry approximately 11,000 vehicles daily in 2015; 15,000 in 2025; and 20,000 in 2035. This will provide much needed relief (18% reduction in trips) to the existing US 90 corridor which is currently functioning at capacity or failing through the eastern portion of the City of Milton. The new roadway will function at better than a level of service of C for the opening year, and future design years. The SR 87 Connector is anticipated to provide a comfortable

		level of service for vehicles and trucks beyond 2035 as well. The operational performance of both alternatives is quite similar, with Alternative 1 carrying approximately 10% more traffic than Alternative 2.”
4	General comment, Section 2.2.2, page 2.3, first paragraph	Can this section be expanded to clarify the need for bicycle and sidewalk connectivity within the County, see page 1.12 second paragraph.
	Response	<p>Added the following to better outline the connectivity: “This project will also address the need for greater bicycle and sidewalk connectivity within the county. This new north-south link over Blackwater River will establish a county-wide network that will serve the east and northeast portions of the county connecting a trail along US 90 to areas north of Whiting Field and State Lands. Most notably will be a connection between the Blackwater Heritage State Trail (BHST) and the Historic State Road 1 Trail. The BHST is a linear park that has been embraced by the community. There is a very active bicycling, horse riding, running, etc. population in the surrounding area that utilizes the trail, and future plans call for the trail’s extension to both the north and south. The Historic State Road 1 Trail has just undergone a revitalization project that repaired much of its brick path, making it a desired trail as well. In addition, Whiting Field is in the process of expanding its trail system to circle its perimeter.</p> <p>As there is no transit in the area, the multimodal improvements are based on the pedestrian and bicycle facilities provided in conjunction with the roadway, as well as connectivity to the Park-and-Ride Lot at US 90 and SR 87S and the new Whiting Aviation Park located on the east side of NAS Whiting Field.”</p>
5	General comment, section 2.2.2, page 2.4, second paragraph	The paragraph refers to a ‘failing level of service’ and a ‘comfortable level of service for the vehicles and trucks beyond 2035’. A reader may not understand what these statements mean. Please clarify this section and these statements for the reader.
	Response	<p>Added: “There are six levels of service (LOS) defined for capacity analysis on roadways. They are given letter designations A through F, with LOS A representing the best range of operating conditions and LOS F the worst. The specific terms in which each level of service is defined vary with the type of facility involved. In general, LOS A describes a free-flowing condition in which individual vehicles of the traffic stream are not influenced by the presence of other vehicles. LOS F generally describes breakdown operations (except for signalized intersections) which occur when flow arriving at a point is greater than the facility’s capacity to discharge flow. Levels of service B, C, D, and E represent intermediate conditions, with the lower bound of LOS E often corresponding to at or near capacity operations.</p> <p>According to the Santa Rosa County Comprehensive Plan, the current adopted LOS Standard for US 90 is D. In 2008 before this study began, US 90 from Ward Basin Road to SR 87N had a failing level of service (LOS</p>

		F)."... "The SR 87 Connector is anticipated to provide a comfortable level of service (LOS C or better) for vehicles and trucks beyond 2035."
6	General comment, section 3.4, page 2.15, second paragraph	This section discusses the typical section for Alternative 2, but does not reference a figure for this proposed typical section. The document should reference a figure showing the proposed typical sections for Alternative 2.
	Response	Added reference to Figure 3.5, Section 3.1.4, Construction Alternatives
7	General comment, Section 5.3.1, page 5.12, third paragraph	Please spell out the acronym 'CRM' in the document if it has not.
	Response	The following was added for clarification, "A phased approach to assess the Section 106 resources was done due to the scope and magnitude of the project area, and the alternatives being considered." CRM was removed to eliminate confusion.
8	General comment, Section 5.3.2, page 5.14, third paragraph	The document indicates that 'No bridge pilings or other bridge infrastructure will be installed within the trail corridor.' If this is a commitment, perhaps it should be folded into the commitment list in Section 7.1
	Response	Expanded the first bullet under Commitments for FDEP/OGT: "To provide grade separation between the proposed facility and the BHST to avoid Section 4(f) impacts. No bridge pilings or other infrastructure will be installed within the trail corridor."
9	General comment, Section 5.3.3, page 5.15, last paragraph	The term 'Section 4(f) action' is incorrect. Please change this to 'Section 4(f) involvement'.
	Response	Updated to involvement
10	General comment, Section 5.4.3, page 5.20, last paragraph	The document indicates that a noise barrier 'may be' reasonable and feasible. A noise barrier wall is either feasible or not. Please clarify this paragraph.
	Response	To explain "may", added: "Two out of the 11 scenarios do result in a benefit of over \$42,000 per site." <i>Note: not all Barrier height/width combinations achieved the required benefit.</i>
11	General comment, Section 5.4.10, page 5.41, first paragraph	The document refers to the ESA Section 7 Formal Consultation. The ESA Section 7 Formal Consultation process should be briefly explained for reader.
	Response	Added, "Under Section 7, federal agencies must consult with USFWS when an agency action may affect a listed or endangered species. If it is determined the action will likely adversely affect a listed species, the

		agency submits to USFWS a request for formal consultation. During the informal review of this project, it was determined that formal consultation should be requested for possible impacts to the Gulf sturgeon and the reticulated flatwoods salamander. During the formal consultation process, our project team and USFWS shared information about the project and the likely impacted species. USFWS followed this with the preparation of a Biological Opinion on whether this project will jeopardize the continued of existence these species. (Appendix A Correspondence, Appendix I, Biological Opinion/Formal Consultation Responses).”
12	General comment	Despite block data, it appears that Alternative 1 has fewer overall potential adverse social impacts than does Alternative 2.
	Response	Agreed. Alternative 2 had fewer impacts during the initial data collection for this project. However, a new subdivision has started right along the alignment of Alternative 2 and is now up to over 100 homes. The public hearing will be the first time some of these new residents will have the opportunity to meet with the project team, though a newsletter with project updates was sent after the 2013 tax rolls were updated to catch any new residents and give them a status.
13	General comment	Not really discussed, but it seems that elimination of the southern routes avoided potential adverse impact to a black community (low as 35% as high as 100% in area blocks). The census data for income for that part of southeast Milton may also be low income. Please add to reasoning supporting elimination of Alts 4-6 if applicable.
	Response	Agreed, included: Of particular note, the elimination of the southern alternatives due the inability to traverse protected lands also resulted in the avoidance of Census areas within Santa Rosa County that had the highest minority percentages, and included some of the lowest income per household amounts as well.
14	p.iv/acronyms	ADA is defined, but not LEP, Title VI, EJ, etc. If referenced in the document, it might be helpful to include those definitions in the acronym section.
	Response	LEP and Title VI has been added to the acronyms, the following was also added under 5.1.1, Social Impacts: “During the alternatives location development, the project team considered community cohesion, noise, visual aesthetics, potential relocations, archeological and/or historical areas, etc. In addition, environmental justice concerns were also addressed. Environmental justice is the fair treatment and meaningful involvement of all people impacted by this project regardless of race, color, national origin, or income.”
15	p.1.3/s.1.2/top of page	Is the County planning to bring back transit anyway or is it project dependent? If the decision is dependent upon or related to this project, then the project may be a modal benefit that the EIS might want to identify. Please clarify.
	Response	Transit is dependent on county funding. Currently, it is not planned to be reinstated until funding becomes available.
16	p.3.12 & 13/Tables	Understanding that this was a preliminary evaluation of the two corridors, the socio-economic judgmental categories should be more broadly identified than ‘relocation and cultural services’. This limited assessment

		reinforces the notion that relocation is the only real social impact. Another category is Community and Cultural Resources. Please discuss this and other the socio-economic judgmental categories.
	Response	Agreed, the Controversy Potential scoring was related to the impacts to existing neighborhoods. This should have been more appropriately titled Community and Cultural Resource Impacts. This was updated, and more verbiage added to 5.0 Environmental Consequences to better define this.
17	p.4.4/s.4.1.2 LEP	Use of past tense is a bit confusing. Recommend, “given the low percentage of LEP, language services for this project are not required. However, FDOT will provide interpretation services, free of charge, with reasonable notice.”
	Response	Updated past tense and added statement.
18	p.4.2/4.1.2 Demographics	Does the 8.40% blacks, etc. represent a cohesive community (cluster) or based on site visits does race/ethnicity seem disbursed? In other words, has a community been identified for which impacts must be analyzed? It isn’t clear whether two of the 36 impacted blocks require further analysis or whether it is determined that there isn’t a significant presence of minority populations. If the former, then further discussion is recommended of why the impacts, if any, are not disproportionately high or adverse (see the LEP and Mobility sections – both have analysis and conclusions). Please provide clarification.
	Response	Added the following, and also updated 5.1 Environmental Consequences. “In all of the above blocks, existing road right-of-way was utilized where possible to minimize any residential impacts, though impacts associated with roadway widening will apply. More information on the impacts in these areas is found in Section 5.1, Environmental Consequences.
19	p.4.4/s.4.1.2 mobility	Nice, brief analysis. Very to the point regarding benefits and in outlining why there is no apparent burden.
	Response	Thanks!
20	p.4.7/s. 2.3 par. 3	Similar to comment on demographics. Is this a conclusion of no significant low income population or of no disproportionately high and adverse impacts? If the latter, then there needs to be more discussion of likely impacts. If the former, then no analysis is required. Simply state that there does not appear to be a significant low income population . . . no analysis is required.
	Response	Updated to include: “According to the Census Block information, there is an average of less than 3 persons per household (after removing the blocks with no population). As a result, none of the Block Groups reflect a significant low income population. There are no likely disproportional impacts to citizens below the poverty line of \$19,530. Of particular note, the elimination of the southern alternatives due to the inability to traverse protected lands also resulted in the avoidance of Census areas within Santa Rosa County that had the highest minority percentages, and included some of the lowest income per household amounts as well.

21	p.5.1/s. 5.1.1 par. 2	We agree with the conclusion, but displacement is not synonymous with adverse impacts. Rather, it is often those whose properties now front a roadway that are more impacted (noise, pollution, cohesion, safety, etc.), for example those on Oakland for Alt. 1 and Seasons/Fall for Alt 2. Apparently there will be few adverse impacts to affected residents generally, with the most serious being the minimal relocation. Is this correct?
	Response	<p>Added: “The social impacts expected generally arise from the requirements for right of way associated with the proposed action, and apply to both of the remaining alternatives. The majority of the study area does not include dense residential areas, or areas with extensive housing. However, both alternatives do intersect SR 87N in areas that have seen growth since the study began in 2009. Alternative 1 joins SR 87N at Oakland Drive. This roadway includes scattered established homes. Property lines for the residences were followed for the roadway widening to ensure the residential parcels were not impacted. Alternative 2 intersects SR 87 and realigns SR 89 just north of a new subdivision. When this study began, there were few homes in the area. Now there are nearly 100 homes within this subdivision, with 16 of the now developed parcels within 50 ft. of the proposed corridor.</p> <p>Apart from the two displaced vacant homes, the short term effects of the proposed action will be felt by those that reside nearby during the period of construction. The long term effects will be associated with increased noise from a new/widened roadway (See 5.4.3 Noise). In comparison, other long term effects are improved mobility for residents as well as through traffic; savings in time and fuel provided by a new, more direct connection from I-10 to Whiting Field and the northern part of the county; multi modal enhancements and opportunities; and enhanced motorist safety by removing nearly 20% of the traffic from constrained portions of US 90.</p>
22	p.5.8/s.5.1.5 Relocation	Please add the following general nondiscrimination statement upfront in Section 5.1. ‘This is project is being advanced in compliance with nondiscrimination authorities, including Title VI of the Civil Rights Act. FDOT will not exclude from participation in, deny the benefits of or discriminate against anyone on the basis of race, color, national origin, sex, age, disability, religion or family status.’
	Response	Added
23	p.5.8/s.5.1.6 Mobility	Recommend adding an ADA compliance statement to the section 5.1.6. While NEPA documents do not specifically require an ADA compliance statement, it makes a logical tie when pedestrian facilities are a part of the project. It also serves as a reminder that each stage of transportation from planning to maintenance has an ADA role. It does not rest entirely in design.
	Response	Added to this section: “The pedestrian features included in this project will be designed following the FDOT Design Standards that have been revised to reflect accessibility requirements required by the Americans with Disabilities Act Accessibility Guidelines (ADAAG) and the Florida Accessibility Code (FACBC).”

24	p.5.19/s.5.4.3 Noise	Are the sites that will exceed NAS located in areas identified as higher minority (i.e., near the two impacted blocks)? If so, then this should be part of the disproportionately high/adverse impact analysis.																																
	Response	The sites are associated with a new subdivision that was not part of the Census data (after 2010).																																
25	p.6.1/s.6.1 Comments/Co ordination also Appendix J	Please include the FDOT approved PI nondiscrimination statement. “Public participation is solicited without regard to race, sex, color, national origin, age, disability, relegation and family status. Persons required special accommodation under the Americans with Disabilities Act (ADA) or language services (free of charge), should contact XXXXXXXX (project manager or PIO) at XXXXXXXX or xxxx@xx.com or Florida Relay 711”. While not currently required, it’s a good idea to also include the FDOT approved statement on <i>all</i> documents meant for the public.																																
	Response	Added, but changed relegation to religion																																
26	DEIS / p . 2.4 / s. 2.2.6 / Tab. 2.1	As the P&N is congestion-based, it would be helpful to breakout the types of crashes (e.g., sideswipe, rear-end) to show how the alternative alleviates these. The detailed information can be brought up to Section 3.																																
	Response	<p>Added the following to this section: “Likewise, the number and types of crashes were also gathered for several segments. The following is a summary of the five most predominant crash types on segments of US 90 and SR 87N, as well as bicycle and pedestrian crashes.</p> <table border="1" data-bbox="487 743 1759 1192"> <thead> <tr> <th>Crash Type</th> <th>Rear End (%)</th> <th>Angle (%)</th> <th>Side-swipe (%)</th> <th>ROR (%)</th> <th>Left Turn (%)</th> <th>Bike (#)</th> <th>Pedestrian (#)</th> </tr> </thead> <tbody> <tr> <td>US 90 from SR 87N to Ward Basin</td> <td>42.3%</td> <td>22.7%</td> <td>10.3%</td> <td>9.3%</td> <td>3.1%</td> <td>2</td> <td>1</td> </tr> <tr> <td>US 90 from Ward Basin to SR 87s</td> <td>39.2%</td> <td>18.6%</td> <td>7.8%</td> <td>11.8%</td> <td>4.9%</td> <td>0</td> <td>0</td> </tr> <tr> <td>SR 87N from US 90 to Harvest Point</td> <td>19.7%</td> <td>28.2%</td> <td>2.6%</td> <td>13.7%</td> <td>8.5%</td> <td>3</td> <td>3</td> </tr> </tbody> </table> <p>The majority of crashes on SR 87S from I-10 to US 90 occurred at the US 90/SR 87S intersection. The crashes along US 90, from SR 87S to SR 87N 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 milepost 13.847 just east of Ward Basin Road. The crashes along SR 87N from US 90 to Southridge Road were generally distributed throughout the segment. The six pedestrian/ bicycle crashes on SR 87N all occurred at</p>	Crash Type	Rear End (%)	Angle (%)	Side-swipe (%)	ROR (%)	Left Turn (%)	Bike (#)	Pedestrian (#)	US 90 from SR 87N to Ward Basin	42.3%	22.7%	10.3%	9.3%	3.1%	2	1	US 90 from Ward Basin to SR 87s	39.2%	18.6%	7.8%	11.8%	4.9%	0	0	SR 87N from US 90 to Harvest Point	19.7%	28.2%	2.6%	13.7%	8.5%	3	3
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		<p>different intersections, with no concentration in any one area. However, two out of the three pedestrian/ bicycle crashes on US 90 occurred in the historic downtown Milton area just west of the Blackwater River bridge, with the final at Ward Basin Road.</p> <p>On the portion of US 90 that is shared with SR 87, the majority of the crashes are Rear End collisions, followed by Angle collisions. This portion of roadway is generally a two lane typical section, with turning lane improvements at signalized intersections. This segment of US 90 had an Actual Crash Rate for years 2005, 2006, 2007, and 2009 that exceeded the statewide average for other roads of similar type in Florida with enough statistical significance to be considered outside of random variation (>99.9%). On SR 87N from US 90 to Harvest Point (location of intersection with Alternative 2), Angle collisions are the most prominent followed by Rear End and Run off Road (ROR) collisions. This roadway is generally a four lane divided typical section. SR 87N had higher crashes than the statewide average for 3 out of the 5 years, but only 2008 was statistically considered outside of random variation.</p> <p>Rear End collisions are indicative of congested conditions where there is stop-and-go traffic, inadequate gaps between vehicles, large numbers of turning vehicles, drivers unaware of intersections, etc. Angle collisions are indicative of restricted site conditions, large intersection volumes, excessive speeds at approaches, etc. ROR crashes are generally due to inadequate shoulders, inadequate roadway design, narrow lanes and improper channelization. It should be noted that on SR 87N, the clusters of these type of accidents occurred at a median change, from a continuous bidirectional median to a restricted median, and at the intersection where SR 87 and SR 89 converge. According to the Highway Safety Improvement Program Manual, the countermeasures for Rear End collisions are to widen the roadway, add turn lanes, add warning/flashing signals, reduce speed, etc. Countermeasures for Angle collisions include removing sight obstructions, add traffic lanes, or reroute traffic. The countermeasures for ROR crashes are to improve pavement markings, upgrade roadway shoulders, widen lanes, reduce congestion, improve channelization, relocate islands, etc.</p>
27	DEIS / p. 2.4 / s. 2.2.5	As the P&N is congestion-based, the relevant Origin-Destination (i.e., showing which areas could shift their travel to the new alternative) information should be brought forward in the report, which would better describe the existing conditions.
	Response	Added to this section: “Presently, SR 87 follows along the congested US 90 Corridor for five miles. This portion of the corridor is operating generally at a LOS F and is the area where the only fatality in the study area occurred. Improvements to the existing roadway in this vicinity are difficult due to the historic downtown Milton area. Currently having only the US 90 two-lane bridge crossing the Blackwater River, all vehicle trips from the east and SR 87S to as far south as Navarre Beach, as well as trips heading north up Ward Basin Road,

		are forced to cross the US 90 bridge exacerbating it's congestion. The SR 87 Connector will provide a new roadway to connect SR 87S and SR 87N. This will reroute through-traffic headed north from I-10, and is projected to remove 18% of the traffic off of US 90 east of Milton in the study 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. With this new and additional river crossing afforded by Alternatives 1 or 2, the traffic can be expected to re-distribute. Trips from east US 90 and SR 87S that are destined for SR 87N, Whiting Field or Munson Highway will no longer be forced to use the US 90 Bridge and go through the congestion of downtown Milton. Likewise, trips using northbound Ward Basin Road will have the option to head east on US 90 to connect with the Connector crossing the river at the new location. This redistribution of traffic would also hold true for the opposite flow of traffic as well. "
28	General comment;	Please arrange all DEIS and supporting documents, once comments have been satisfied, in the format provided by EPA for submittal to the Federal Register (see e-NEPA procedural pamphlet).
	Response	Done
29	General comment;	Please include a statement on the cover page (not the logo page) and in the document text of FHWA's intent to combine the FEIS/ROD. I have attached the FEIS/ROD communication plan for guidance.
	Response	Done, according to the guidance. Also included the standard statement that FHWA will select the final alternative in Section 7.3 Recommendations.
30	Summary; p. 1.1, s. 1.1	Third paragraph; the statement "the project will reduce traffic congestion within the City of Milton and alleviate travel demand on the section of US 90 currently shared with SR 87" is very strong. Please parenthetically reference where the reader can get more information that supports that argument.
	Response	Added after the statement: More information on the benefits to US 90 can be found in Section 1.3 of this document, as well as in Section 10 of the SR 87 Connector PD&E Study Design Traffic Technical Memorandum, dated October 2012.
31	Section 7; p. 1.6, s. 1.4	Third bullet point; Section 7 consultation was completed per the Services Biological Opinion issued on December 20, 2013. The bullet point information should accurately reflect that fact. The document should be reviewed to correct other future tenses used when referring to the Section 7 consultation (i.e. p. 1.7, 1.8, 5.57).
	Response	Bullet updated to state: "Federally Listed Species: Designated Critical Habitat for Gulf sturgeon and reticulated flatwoods salamander is present within the corridor and would be impacted by the project. Formal Consultation under ESA Section 7 is required and was completed per the Services Biological Opinion issued on December 20, 2013 (See Appendix I)."
32	General comment; Figures, Apdx	Names presented in the legend of each figure in Appendix E are non-descriptive of the differences in the associated NWI code. Please provide a descriptive name (i.e.: PFO1/4C - hydric pine flatwood, PSS1C – seasonally flooded wetland shrub). Please check the scale in each of these figures as well as other figures in the

	E	DEIS. Scale on 'FLUCCS Map' is 1:45,159. Please change to multiple of 6000 (1:6000).
	Response	The maps in Appendix E were updated as requested, UMAM codes were used
33	Bike/Ped; p. 2.3, s. 2.2.2	If the project "will also address" connectivity for bikes/pedestrians, then it will have connection to a trail. The paragraph says "with possible connections" to existing bike/ped facility. Will the SR 87 connector have a connection to BWHT? Commitment (blt pt 3) of s. 7.2 says this project will 'enhance alternative modes of transportation by linking existing multi-use trail facilities'. Is this commitment refereeing to connecting bike/ped paths on SR 87 to the existing facility? Please clarify.
	Response	Removed 'possible'. It will have a connection as stated in the Commitments.
34	General comment; s. 2.2.6	The safety section did not reference a pedestrian or cyclist safety issue. Is there a pedestrian and/or cyclist safety issue currently? Either in crashes or in the general design of the current facility?
	Response	Though there is no specific pattern to the crashes, information was added to this section. See response to #26; also added the following to section 5.1.6 Mobility, under Multi-modalism: "The SR 87 Connector will greatly enhance the trail system by providing the community pedestrian/bicycle facilities linking the BHST to the Historic SR 1 Trail along US 90. Likewise, future links can be made to area parks and recreation facilities. It should be noted that though the US 90 Corridor shared between SR 87 and US 90 in the study area has five foot paved shoulders to serve as bicycle lanes, it currently has unconnected pedestrian features. There are no pedestrian features from historic downtown east to just prior to the Ward Basin intersection. There are sidewalks that begin just east of Marquis Bayou Bridge on US 90 and are continued east as part of the improvements to the Ward Basin Rd. intersection. Though the sidewalks end just east of the intersection, the rest of the US 90 corridor to the east in the study area has the SR 1 Trail that runs parallel along the roadway, serving as a multiuse path. The SR 87 Connector will provide pedestrian and bicycle features from the SR 1 Historic Trail, over Blackwater River, and will tie into the Blackwater Heritage Trail. This provides a link for the two trails that has never existed. The pedestrian features included in this project will be designed following the FDOT Design Standards that have been revised to reflect accessibility requirements required by the Americans with Disabilities Act Accessibility Guidelines (ADAAG) and the Florida Accessibility Code (FACBC)."
35	Safety; p. 2.4, s. 2.2.6	Please include how the crash rate or lack of safety is compared to a standard or other similar roads in the State or region. Will avoiding the high traffic area improve safety conditions and decrease crash rates?
	Response	Added to this section: On the portion of US 90 that is shared with SR 87, the majority of the crashes are Rear End collisions, followed by Angle collisions. This portion of roadway is generally a two lane typical section, with turning lane improvements at signalized intersections. This segment of US 90 had an Actual Crash Rate for years 2005, 2006, 2007, and 2009 that exceeded the statewide average for other roads of similar type in Florida with enough statistical significance to be considered outside of random variation (>99.9%). On SR 87N from US 90 to Harvest Point (location of intersection with Alternative 2), Angle collisions are the most

		prominent followed by Rear End and Run off Road (ROR) collisions. This roadway is generally a four lane divided typical section. SR 87N had higher crashes than the statewide average for 3 out of the 5 years, but only 2008 was statistically considered outside of random variation.																				
36	Planning; p. 2.5, s. 2.2.7	<p>The planning section (section 2.2.7) does a nice job of explaining the project and how it will be completed. As a condensed explanation please provide a brief table in the text with phase [PE (PD&E and Design), ROW, Construction], year phase to be implemented (i.e.: 2016-2020), approximate cost (i.e.: \$2.5 million), and funding source (i.e.: TPO earmark, State, Federal, State/Fed). The table should follow the second paragraph of s. 2.2.7.</p> <p>This is an example of a table used recently in another district. Due to the long term phasing you may need additional rows or phasing for short term vs long term. This table gives the public a reasonable expectation and understanding of project timeframes and total cost. A brief project description which generally follows the table should be added to the Planning section.</p> <table border="1"> <thead> <tr> <th></th> <th>\$Millions</th> <th>Time Frame</th> <th>Funding Type</th> </tr> </thead> <tbody> <tr> <td>PE</td> <td>\$21.5</td> <td>2012-2014</td> <td>State</td> </tr> <tr> <td>ROW</td> <td>\$46.0</td> <td>2013-2015</td> <td>State/Fed</td> </tr> <tr> <td>Construction</td> <td>\$98.3</td> <td>2015-2016</td> <td>State</td> </tr> <tr> <td>Total:</td> <td>\$165.7</td> <td></td> <td></td> </tr> </tbody> </table>		\$Millions	Time Frame	Funding Type	PE	\$21.5	2012-2014	State	ROW	\$46.0	2013-2015	State/Fed	Construction	\$98.3	2015-2016	State	Total:	\$165.7		
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	Response	<p>Added the following table:</p> <table border="1"> <thead> <tr> <th>Phase</th> <th>\$ Millions Alt 1/Alt2</th> <th>Time Frame</th> <th>Funding Type</th> </tr> </thead> <tbody> <tr> <td>PE (from LRTP)</td> <td>\$14.71/\$14.71</td> <td>2016-2020</td> <td>State/Federal</td> </tr> <tr> <td>ROW</td> <td>\$5.06/\$5.63</td> <td>2041-2050</td> <td>State/Federal</td> </tr> <tr> <td>Construction</td> <td>\$116.78/\$120.41</td> <td>2046-2055</td> <td>State/Federal</td> </tr> <tr> <td>Totals</td> <td>\$136.55/\$140.75</td> <td></td> <td></td> </tr> </tbody> </table> <p>The Project description follows the table, along with proposed typical sections.</p>	Phase	\$ Millions Alt 1/Alt2	Time Frame	Funding Type	PE (from LRTP)	\$14.71/\$14.71	2016-2020	State/Federal	ROW	\$5.06/\$5.63	2041-2050	State/Federal	Construction	\$116.78/\$120.41	2046-2055	State/Federal	Totals	\$136.55/\$140.75		
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37	Planning; p. 2.5, s. 2.2.7	Per previous conversations between FHWA and District 3, please make a commitment to leave adjacent unused ROW purchased for future expansion in natural generally un-impacted state (not cleared or grubbed) until such time as it is needed for the proposed expansion to 4 lanes. This should be added as a commitment in Section 7.1.																				
	Response	Added																				
38	Planning, general;	TIP – The submittal included old TIP pages and referenced old TIPs. The project is in the current TIP (search by project number 4167483). It is programmed for \$2M in current year funding for PDE/EMO Study. Our office cannot find the Design work shown in the TIP. The Design phase needs to be added to the TIP.																				

		Action Item – Add Design Phase to the TIP for \$14,714,314 in current year.
	Response	This project started in 2009, so the old TIP pages are included. The new TIP pages are in error and were not included. The design funds in the current TIP are actually for the US 90 PD&E, not for SR 87 Connector.
39	Planning, general;	STIP – The project package documentation states it is not in the STIP, while the cover sheet indicates this project is in the STIP. The submittal includes STIP sheets from old STIPs. The current STIP only includes the EMO study, no design work. The design money will need to be done after the project is added to the TIP. Action Item – Add Design money to STIP, show Design Phase (\$14,714,314) after project is added to the FL-AL TIP.
	Response	The design funds in the current TIP and STIP are for the US 90 PD&E study. We are working with FDOT and the TPO to update this. The planned design funds in the LRTP are correct.
40	Wildlife; p. 4.19, s. 4.10	Third paragraph: the sentence starting “Specifically, the alternatives traverse...” and ending with a figure reference should be moved to the end of the next paragraph.
	Response	This was moved
41	Wildlife; p. 4.21, s. 4.10	The final paragraph on the page is repetitive. Please remove it.
	Response	Removed
42	Economic Impacts; p. 5.2, s. 5.1.2	Please define “NOLF”.
	Response	Added the definition to NOLF in the acronyms: Naval Outlying Fields, an auxiliary airfield associated with a Naval Air Station
43	Cultural Resources; p. 5.13, s. 5.3.1	Second paragraph: There is an implication in this section of a commitment based on a local interview. Please clarify if District 3 will provide an underwater CRAS once the bridge location is determined? If so, please add the commitment into Section 7.1.
	Response	There are no plans at this time to conduct an underwater survey due to the property owner’s comment. Remains of at least 15 commercial vessels are located in the Blackwater River near Milton and Bagdad. The Bethune Blackwater Schooner, located near the former Morton Brickyard and Mill, is well-preserved, with nearly its entire hull intact. Other shipwrecks include the Cedar Wreck in Wright Basin and the Snapper Ketch above Bagdad’s Shipyard Point. The most visible shipwrecks are located in Shield’s Cove near the historic Bay Point Mill. Ships sunk here, including the “Palafox”, “Dinty Moore”, “George T. Locke” and “Guanacastle”, transported lumber. In the 1920s, the passenger steamer “City of Tampa” caught fire, and was pushed from the Bay Point docks and sank in Blackwater Bay. These and other shipwrecks are part of Santa Rosa County’s vibrant maritime heritage that made this region a center of commerce from the late 1800s through the 1930s. However, these vessels are not in the area being crossed by this proposed roadway.

		<p>Sponsors: The Blackwater Pyrates and the Florida Department of State.</p> <p>Updated the section to read: “It should also be noted that an interview with Mr. Michael Brown, a property owner, disclosed the potential for a sunken vessel (boat, barge of unknown date) in the Blackwater River, west of the power line corridor and purportedly near both proposed SR 87 alignments. However, an underwater survey is not within the scope of this project. Rather, survey and evaluation of this resource may best be addressed at a later date when a bridge design and location have been determined. There are remains of at least 15 known commercial vessels in the Blackwater River near Milton and Bagdad. These shipwrecks are part of Santa Rosa County’s vibrant maritime heritage that made the region a center of commerce from the late 1800s through the 1930s. All of the known vessels are associated with deeper water areas, and are not in the shallow area that is being crossed by the proposed structure for this project.”</p>
44	Noise; p. 5.19, s. 5.4.3	Third paragraph: Please add a commitment to conduct noise abatement analysis during design into Section 7.1 of document.
	Response	Added
45	Noise; p. 5.19, s. 5.4.3	The right most column header should likely read ‘Increase of 15 dB(A) or More’ not “Move”. Please correct.
	Response	Updated
46	Wetlands; p. 5.22 and 5.23, s. 5.4.4	Table 5.7: Please place parenthesis around ACRES in two right column headers for both portions of Table 5.7.
	Response	Updated
47	Wetlands; p. 5.26, s. 5.4.4	UMAM polygon evaluation sheets are not present in Appendix E. Please provide UMAM worksheets.
	Response	Added to Appendix E, Wetland Exhibit
48	Figure 5.4; p. ~5.38	Site ID 10 is missing from map but is shown in legend. Likely, one of the two site 9s is actually #10. Please correct.
		Figure was updated
49	Floodplains; p. 5.39, s. 5.4.8	This section references that the bridges of the Blackwater River and Clear Creek will have no less than 6 feet of clearance above MHW elevation. Please briefly explain why that number is used as the minimum clearance above MHW.
	Response	Added to 5.4.8: “This is the minimum requirement for navigational purposes outlined in FDOT’s Plans Preparation Manual.”
50	Floodplains; p. 5.40, s. 5.4.8	The italicized quote on page 5.40 has no reference and it is unclear how it applies to this project. Please provide the reader background/reference for the italicized quote and its implications to this project.
	Response	Added the following to 5.4.8 for clarification: “The following statement, taken from the Location Hydraulics

		Report, summarizes the overall encroachments this project will have with regards to the floodplain:”
51	Floodplains; p. 5.40, s. 5.4.9	Please provide a page reference in 64 page ETDM Summary Report for the Coastal Zone Consistency where the “adequate resolution of issues” statement is located.
	Response	Added Page 4
52	Commitments and Recommendations : p. 7.1, s. 7.2	First bullet point: Please clarify or correct the statement. ‘.... A multi-use path from the project southern extent to....’
	Response	Updated to be: “multi-use path connecting the Historic SR 1 Trail and the BHST. Phase two would be built as traffic demand dictates, and would be a four-lane facility with bike lanes and will retain the multi-use path.”
53	Commitments and Recommendations : p. 7.1, s. 7.2	FDEP/OGT: Please don’t avoid the Section 4(f) process. But feel free to avoid Section 4(f) impacts.
	Response	Changed to Impacts
54	Commitments and Recommendations : p. 7.1, s. 7.3	Please discuss what input is considered when choosing the recommended alternative (i.e.: public input, agency input, evaluations provide in the NEPA documents).
	Response	Added: Due to the similarities in the two alignments, no preferred alternative will be presented in this document. The results of the alternative selection process indicate that both alternatives have similar impacts and provide similar benefits. This process reviewed engineering criteria such as safety, costs, traffic analysis, and multimodal implications. It took into account environmental impacts to wetlands, threatened and endangered species, noise, air, contamination, etc. It also included studying socio-economic factors such as hurricane evacuation, community and cultural resource impacts, historic site impacts, Section 4(f) impacts, and relocation impacts. Likewise community and agency input has also shaped the type and location of the alternatives, as well as the features, such as the connection to the BHST. FHWA will make the final determination on a preferred alternative once alternative impacts and agency comments on this DEIS and public input resulting from the public hearing have been fully evaluated. Unless new information is brought forward through the public and agency comment period, FHWA intends to select the preferred alternative and will issue a combined Final Environmental Impact Statement and Record of Decision (FEIS/ROD) in accordance with Pub. L. 112-141, 126 Stat. 405, Section 1319(b). If FHWA selects another alternative based on public or agency input, FHWA will issue a separate FEIS and ROD in accordance with 23 CFR 771.”
55	List of Preparers: p. 8.1	Please correct the spelling of my first name: “Joseph”. Please include, after identifying my degree, “15 years of experience in environmental analysis and State and Federal permitting”
	Response	Updated, and added

Comments from Mary Mittiga, US Fish and Wildlife:

1. DEIS Page 5.50. The Service didn't concur with a determination of "may affect, not likely to adversely affect". We completed formal consultation and determined that 1) the proposed project "may affect, but is not likely to jeopardize the continued existence of the Gulf sturgeon or destroy or adversely modify its designated critical habitat"; and 2) the proposed project "may affect, but is not likely to jeopardize the continued existence of the reticulated flatwoods salamander or destroy or adversely modify its designated critical habitat".

Response:

Updated text to be: The Blackwater River is designated as Gulf sturgeon critical habitat by the USFWS and is traversed by both alternatives 1 and 2. The project "may affect, but is not likely to jeopardize the continued existence of the Gulf sturgeon or destroy or adversely modify its designated critical habitat". See **Appendix I** for USFWS formal consultation coordination and determination.

Updated text to be: Due to the presence of the critical habitat, the observed appropriate habitat within the alignments, and the efforts proposed by FDOT to minimize direct impacts to the critical habitat, the proposed project "may affect, but is not likely to jeopardize the continued existence of the reticulated flatwoods salamander or destroy or adversely modify its designated critical habitat". See **Appendix I** for USFWS formal consultation coordination and determination.

2. DEIS Page 7.1, Section 7.1. A line should be added to the commitment section to indicate that all commitments made as terms and conditions of the Biological Opinion (Appendix I) will be fulfilled.

Thanks for providing these documents for comments. Please give a call if you have any questions or comments.

Response

Added Commitment as outlined above.

July 31, 2015

Submitted to James Christian, PE, FHWA

Ms. Joyce Stanley
Regional Environmental Protection Specialist
Office of Environmental Policy and Compliance
United States Department of the Interior
Richard B. Russell Federal Building
75 Spring Street, S.W., Suite 1144
Atlanta, Georgia 30303

RE: Comments and Recommendations on the Reevaluation of the Draft Environmental Impact Statement for the SR 87 Connector Project, Santa Rosa County, Florida

Dear Ms. Stanley:

Thank you for your comments on the Draft Environmental Impact Statement for the above referenced project. The following presents our proposed responses to those comments.

Comment: The Department requests that the Final EIS include a commitment to provide the U.S. Fish and Wildlife Service with an opportunity to comment on the final design plans prior to construction. In particular, the Stormwater Pollution Prevention Plan and Stormwater Management Plan should be provided for approval to assure that the locations of stormwater treatment ponds do not negatively affect the reticulated flatwoods salamander, Gulf sturgeon, and their critical habitat units beyond levels considered during the formal Section 7 consultation.

Response: The commitment has been added that the U.S. Fish and Wildlife Service will be able to review the final design plans. These plans will be sent to Ms. Mary Mittiga.

Comment: The Department is concerned that during construction there will be disruption to the public's use of the trail and requests that the FHWA contact John Barrett to develop commitments to minimize disruption of the public's use of the trail during construction. Also please provide a copy of the bridge design to John Barrett, Program Manager, Federal Lands to Parks, National Park Service, Southeastern Region, 100 Alabama St., SW, Atlanta, GA 30303.

Response: It is estimated that the portion of the bridge over the Blackwater Heritage State Trail will take 20 weeks to construct. During this time, the contractor will provide a detour route. After the bridge is constructed, the contractor will open up the trail to its previous function. The finalized bridge design will be sent to Mr. John Barrett during the design phase. Please see Section 5.3.3 4(f) for more information as well as 7.2 Commitments.



Florida Department of Transportation

RICK SCOTT
GOVERNOR

605 Suwannee Street
Tallahassee, FL 32399-0450

JIM BOXOLD
SECRETARY

July 31, 2015

Mr. Heinz J. Mueller, Chief
NEPA Program Officer
United States Environmental Protection Agency
Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street
Atlanta, Georgia 30303-8960

RE: Draft Environmental Impact Statement for the SR 87 Connector
Santa Rosa County, Florida
CEQ No. 20140301

Dear Mr. Mueller:

Thank you for your comments on the Draft Environmental Impact Statement for the above referenced project. The following presents our proposed responses to those comments.

Comment: EPA recommends that the Final EIS include a commitment for noise mitigation if warranted by the selected alternative. The Final EIS should include a description of the types of noise mitigation measures that will be utilized for noise impacts attributable to the preferred alternative, if necessary. Using more than one form of incremental mitigation should be considered in the Final EIS.

Response: After the public hearing, Alternative 2 was shifted to the north at the Harvest Point Subdivision. With this shift, the proposed noise impacts were reevaluated which determined that the areas which previously warranted noise mitigation no longer exceed a change of 10dB(A). Therefore, no areas along the preferred alternative meet the cost feasible requirement for noise mitigation. For more information, the Noise Report has been updated with an addendum to reflect this new information.

Comment: What percentage of the project traffic will consist of trucks and can this be reduced? Although slow speed limits for cars may not be practical to reduce noise, slower speed limits for trucks may be more reasonable and should be discussed. This could be important since tire and engine noise from one truck equals the noise generated by many cars.

Response: Current truck traffic along the shared portion of U.S. 90/S.R. 87 is 8.4%. One goal of this project is to draw truck traffic away from the historic downtown Milton area as well as to provide a more direct connection to service military truck traffic

between Eglin and Whiting Field. After the public hearing, the proximity of Alignment 2 with respect to the Harvest Point subdivision was reconsidered. The option which has been brought forth for further analysis is approximately 200' from the Harvest Point subdivision.

Comment: The Draft EIS does not include the analyses and/or listing of construction noise sensitive sites and EPA recommends the adherence to construction practices to control noise and vibration impacts. Although construction noise is temporary, Best Management Practices (BMPs) including the use of screens (hush houses) around stationary equipment and mufflers for earthmoving equipment would help attenuate noise at its source. The Final EIS should estimate the time of construction (months) to help document the magnitude of construction noise.

Response: The table below shows each Noise Sensitive Area and the estimated construction length for the full build out typical section. This was added to **5.4.13 Construction**.

Noise Sensitive Area	Roadway Length (LF)	Construction Length (Days)
1	7,500	278
2	8,900	247
3	7,200	225
4	2,100	58
5	5,000	156

Comment: EPA strongly supports bridging the entire floodplain, wetland, and critical habitat area associated with the Blackwater River, Clear Creek, and the reticulated flatwoods salamander. This commitment should be included in the Final EIS and Record of Decision.

Response: The floodway instead of the floodplain is planned to be bridged. The floodplain was initially discussed and planned, but became cost prohibitive as design of the structure moved forward. To span the floodplain, an additional 2,252 feet of bridge would need to be constructed. At an estimated cost per square foot of \$126.69 dollars, the bridge would cost an additional \$28,282,371.88. However, the over mile long bridge over the Blackwater River will meet regulations by spanning the entire floodway. Floodplain mitigation will be provided upstream of the proposed bridge. The proposed floodplain mitigation may be used in conjunction with the proposed stormwater management facilities to provide additional treatment through a by-pass train away from Cooper Basin. Extensive coordination with the County Floodplain manager was done to ensure correct locations and placement of the structure. Likewise the study team traversed the area around Blackwater River and Clear Creek adjacent to a disturbed area (the existing powerline easement) to minimize impacts. The EIS was revised in all locations discussing the structures for clarity.

Comment: Wetlands mitigation planning should not be deferred until the permitting phase, and the Final EIS should include detailed information regarding a wetlands mitigation plan. As part of the LEDPA decision, FDOT and USACE should ensure

that adequate compensatory mitigation is available for the selected alternative and after avoidance and minimization has been accomplished.

Response: A conceptual mitigation plan has been added as part of **Appendix E, Wetland Exhibit**. It is also referenced in **Section 5.4.4 Wetlands** in the document.

Comment: Detailed information regarding pond sites is included in a Pond Siting Report. However, the body of the Draft EIS document does not list or illustrate where potential stormwater pond sites are proposed for each Alternative. This information should be included in the Final EIS.

Response: Additional information and a figure have been added to **5.4.5 Water Quality** in the EIS, and the figure is included in **Appendix K, Section 3.2.3 Water Quality**. The figure illustrates the locations of the potential stormwater pond sites for each alternative. Please see the Pond Siting Report for more detailed information on potential pond sites.

Comment: The Final EIS should identify the specific BMPs to be applied to attain appropriate reductions in sediment loads and what additional monitoring will be conducted to achieve pollutant reductions.

Response: The following was added to **Section 5.4.13**, "During construction, the contractor will utilize Best Management Practices (BMPs) which will minimize any sedimentation and erosion impacts to areas outside of the limits of construction. BMPs may include silt fence, hay bales, turbidity barriers, and ditch blocks. These are standard practices outlined in the Florida Stormwater Management Plan. This project will require an NPDES permit and submission of a Stormwater Pollution Prevention Plan".

Comment: EPA recommends careful consideration of all water quality impacts, including whether the preferred alignment has first avoided, then minimized impacts to water quality, and then whether there are feasible mitigation measures that will be utilized to rectify any unavoidable impacts to affected waterbodies. The Final EIS should identify whether the preferred alternative is the least environmentally damaging practicable alternative that satisfies the Purpose and Need per Clean Water Act Section 404(b)(1) Guidelines (Title 40 of the Code of Federal Regulation, Section 230).

Response: With the selection of Alternative 2 as the proposed alignment, the minimum quantity of water quality impacts has been achieved. Alternative 2 avoids additional wetland impacts that were found in Alternative 1. Additional mitigation information has also been included in **Appendix E**. This information discusses the preferred alternatives impacts and mitigation suggestions.

Comment: EPA recommends that the Final EIS include information regarding contamination sites associated with the preferred alternative and what type of additional site assessment will be needed. It should also include what type, if any; site remediation may be needed in order for construction activities to proceed.

Response: The following has been added to **Section 5.4.7 Contamination**:

The outlined brownfield areas are similar for both alternatives. However, it is not estimated that any impacts to contaminated areas will be encountered. Therefore, remediation will not likely be necessary. With the close proximity of the existing gas station at the end of Alternative 1, Alternative 2 is a lesser risk. It is **RECOMMENDED** that additional testing be conducted if acquisition of right-of-way or construction of the roadway is located within and/or adjacent to any of the above sites that rank **HIGH**. Testing **SHOULD BE CONSIDERED** for those sites that rank **MEDIUM** and are located within and/or adjacent to the corridor alternatives. The recommendations for environmental testing for the identified sites are included in the Contamination Screening Evaluation Report. The testing procedure should be conducted as follows:

- Install three soil borings to a depth of 25-feet;
- Install three temporary monitoring wells in the surficial ground water within the proposed area of acquisition;
- Collect soils samples on 2.5-foot intervals during the installation of the soil borings and monitoring wells. The soil samples should be tested in the field using the head-space analysis technique recommended by the FDEP. The samples should be tested for the presence of petroleum hydrocarbons using a Flame Ionization Detector – Organic Vapor Analyzer (**FID-OVA**); and,
- Collect a representative soil sample from each soil boring and a ground water sample from each monitoring well and have it analyzed for the parameters identified in the parameters outlined in the SR 87 Connector Contamination Screening Evaluation Report.

Comment: EPA recommends that the Final EIS include information regarding floodplains associated with the preferred alternative. The Final EIS should also include the mitigation commitments for unavoidable floodplain impacts.

Response: The following statement has been added to **Section 5.4.8**:

Both alternatives transverse the 100 year floodplain at the same locations: the Blackwater River and Clear Creek. The following table outlines the impacted floodplains associated with each alternative. Specific locations of impacted floodplains in relation to each alternative can be found in **Appendix F**.

Alternative	Impacted Floodplains (Ac)
1	42.13
2	42.13

The following has been added to **Section 7.1 Commitments**: Mitigation for unavoidable environmental impacts will be accomplished under F.S. Section 373.4137, which allows FDOT to provide compensatory mitigation using mitigation banks and any other options that satisfy state and federal requirements.

Floodplain mitigation (compensation) is outlined in **Section 5.4.8 Floodplains**. Wetland mitigation is outlined in **Appendix G, Wetlands**.

Comment: The Final EIS should describe how the preferred alternative avoids, minimizes, or mitigates potential impacts to wildlife habitat and species.

Response: Both Alternatives are very similar in their impacts and mitigation options, and both include structures of over a mile long to allow connectivity and minimize impacts to the OFW and its associated floodway. In addition, the proposed alternative minimizes direct impacts to the Flatwoods Salamander Habitat by bridging the critical habitat area. The impacts to Gulf Sturgeon have been minimized during construction with commitments in Section 7. These include construction activity limitations as well as choosing a stormwater retention facility on the east side of the proposed roadway. This stormwater pond will potentially utilize a treatment train to the flood plain mitigation area which will result in additional treatment and a discharge point farther away from Cooper Basin. Please see **Sections 5.4.10, 5.4.11** and **Appendix E and G** for more information.

Comment: EPA recommends that indirect and cumulative impacts be further assessed and described in the Final EIS document. FDOT should carefully assess both indirect and cumulative effects on the surrounding area and the effect that this project has on resources of concern when selecting the preferred alternative.

Response: With the proposed Alternative 2, the indirect and cumulative impacts were addressed. As a result, **Section 5.5, Cumulative Impacts** was completely rewritten. Please also see the section concerning indirect and cumulative impacts in **Appendix K**.

Comment: The Final EIS should include the indirect and cumulative effects associated with the preferred alternative. It should also include avoidance, minimization and mitigation measures that will be utilized to help reduce indirect and cumulative effects.

Response: With the proposed Alternative 2, the indirect and cumulative impacts were addressed. As a result, **Section 5.5, Cumulative Impacts** was completely rewritten. Please also see the section concerning indirect and cumulative impacts in **Appendix K**.

Comment: The Final EIS should provide the local communities with a better understanding of the land use changes that can be expected from implementation of this project.

Response: Please see the Section **5.1.3 Land Use** under **Environmental Consequences**. The following was edited/added. 'Existing Land Uses have been previously described in Section 4.6. Changes in land use consist of the conversion to transportation land use from single family residential, industrial and agricultural land uses. Among the affected parcels, the majority are assigned land use categories of agriculture/silviculture and industrial according to the Santa Rosa

County Land Use information obtained from their GIS department. There are some Single Family Residential areas in the vicinity the alternatives intersect SR 87N, as well as in the area near the proposed Munson Highway intersection. The future land use maps for Santa Rosa County indicate that much of the area surrounding the southern portion of the proposed roadway (both alternatives) will remain industrial, or will convert from silviculture to industrial. See **Figure 4.4 Future Land Use**.

The Project Team has also recognized the County and Team Santa Rosa's efforts on a Joint Land Use Planning initiative. This study is a joint land use study that incorporates the land use planning efforts between Santa Rosa County and the NAS Whiting Field Military Installation. The study area encompasses a nearly 8,000 acre area around Whiting Field in northern Santa Rosa County and includes an Aviation park on the east side of the base. With regards to Land Use in the vicinity of Whiting Field, the County's Comprehensive Plan provides guidance on development around the military base. In addition, the County's 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 the aviation industrial park adjacent to NAS Whiting Field, made possible by an agreement with the Navy. Santa Rosa County is nationally recognized for its cooperation with the Navy to achieve goals of both the county and the military. As a result, any Land Use in the vicinity of the military base and just north of both alternatives is protected by the county's comprehensive plan. Extensive coordination between the project team and those involved in the Joint Land Use Planning initiative resulted in slight alignment shifts, proper pond designs, access management classifications, etc. to ensure the best possible locations and typical sections for the alternatives.

The continuity of the SR 87 roadway will mean growth at either end of the connector. Alternatives 1 and 2 provide a bypass around Milton and a more direct route to SR 87N and the Joint Land Use Planning Area from I-10. In addition, both alternatives intersect SR 87N in moderately developed areas, potentially serving existing residents and businesses more efficiently. Likewise, they will serve the economic development of the area as they both provide an additional North-South Corridor; and a more direct route to the Aviation Park, Whiting's East Gate and to the proposed four-lane section of SR 87N to the State Line from I-10. In addition, growth in and around the county's industrial park near the military base should be expected. This expected growth does correspond to the Future Land Use maps. It should be noted that the project team considered the future land use maps, as well as protection of the existing Silviculture areas during the development of the corridors. For instance, the roadway adjoins a gulf power easement limiting adjacent development to the south, whereas the county comprehensive plan will limit development to the north adjoining the base. Likewise, both alternatives will include over a mile of structures that will span the entire floodways of Clear Creek, and Blackwater River, as well as the known salamander habitat and the BHST. Also, the connector will be designed with access restrictions in the rural areas. Once the full build out is completed, this project will have an Access Management Classification of 3. Access Management is the careful planning of the location, type, and design of access to

parcels, businesses and homes. It also includes median opening and driveway location guidelines. The Access Management standards are officially outlined in Chapter 14-97 of the Florida Administrative Code. Access Management Class 3 has restrictive median openings. The openings will be placed every 2,640 feet for full openings and 1,320 feet for directional (left turn only into a parcel). One intent of these access restrictions is to ensure the corridor's effectiveness as an evacuation route. The access management restrictions along with the current comprehensive plan land use restrictions, and the extensive floodplain/wetland locations in the study area, will work in concert to deter development in the rural areas adjacent to the roadway. As a result, the land use changes that may result as part of this study will occur at the southern terminus (US 90) and northern terminus (SR 87N), and at the new roadway intersection at Munson Highway. The future land use maps show the future land use to be industrial at the southern terminus, and commercial/residential at the northern terminus of both alternatives. As previously mentioned, these land uses are compatible with this project. The land use that may be reasonably expected to be altered is at the intersection with Munson Highway. The future land use is currently Agriculture in this area. With this project, residential and possibly commercial development may be likely at this intersection as the connectivity is improved to I-10. Please also see **5.4.4 Wetlands** for Land Use information in the wetland areas.

Sincerely,

J. Brandon Bruner, P.E.
Environmental Management Engineer



Florida Department of Transportation

RICK SCOTT
GOVERNOR

605 Suwannee Street
Tallahassee, FL 32399-0450

JIM BOXOLD
SECRETARY

July 31, 2015

Ms. Lauren Milligan, Coordinator
Office of Intergovernmental Programs
Department of Environmental Protection
3900 Commonwealth Blvd. MS 47
Tallahassee, Florida 32399-3000

RE: Department of Transportation - Draft Environmental Impact Statement -
SR 87 Connector PD&E Study - Milton, Santa Rosa County, Florida.
SAI # FL201410277084C (Reference ETDM # 12597)

Dear Ms. Milligan:

Thank you for compiling comments on the Draft Environmental Impact Statement for the above referenced project. The following presents our proposed responses to those comments.

Division of Recreation and Parks

Thank you for your comments.

Comment: Exhibit 4 of the Presentation: A 20-foot drainage ditch is aligned with the western border of BHST, which shows it draining into an adjacent potential pond siting for stormwater collection. The siting of this potential pond is within the area delineated by the U.S. Fish and Wildlife Service as potential flatwoods salamander habitat. A portion of that habitat lies within BHST. This drainage area and pond siting present probable impacts to a section of wet prairie within BHST that support wetland listed species such as *Sarracenia leucophylla* and the endangered plant *Oxypolis greenmanii*. If the area supporting these wetland species and their associates is drained in conjunction with construction of SR 87, it will likely create impacts by altering inundation durations and stormwater sheetflow. Such alterations have the potential to impact flatwoods salamander habitat.

Response: The referenced stormwater pond from the exhibit in the Public Hearing presentation has been adjusted to avoid impacts to the flatwoods salamander habitat. Initial investigations indicated that the area outlined for the potential pond is uplands. It will be the intent of the design to maintain existing outfall locations to the surrounding wetlands. The Pond Siting report exhibits have been updated to reflect the new location. Appendix K in the EIS document has also been updated with a figure of potential pond sites.

Comment: The design shown at the meeting and the information provided did not make clear that the bridge extending over the Blackwater River, associated floodplain forest and BHST is extended far enough to the north and east of the BHST to allow for 20 feet of clearance from the multiuse trail before it loses elevation. Currently, park staff use a batwing mower to maintain the trail as well as trucks towing a chipper attachment for pruning and exotic plant removal. For equestrians, that section and areas within sight of the trail should receive a design similar to the Land Bridge at I-75, where irrigated planters shield equestrian use on the elevated Marjorie Harris Carr Cross Florida Greenway from traffic on I-75. This design would allow for safe passage of visitors along the trail corridor, minimize impacts to vegetation and allow for the continuation of current recreational and wildlife corridor usage.

Response: The preliminary bridge design does not include any grading within the 100 foot of trail right-of-way. This should allow for the 20 feet of clearance from the trail. This FDEP request was added to the EIS, Section 5.3.3, Section 4(f).

Comment: How will construction of the SR 87 corridor impact recreational use and wildlife use during construction and what provisions will be made to limit siltation/impacts to adjacent and contiguous areas of Outstanding Florida Waters (OFW)?

Response: During construction of the SR 87 Connector, the contractor will utilize Best Management Practices (BMPs) which will limit any sedimentation and erosion impacts to areas outside of the limits of construction. BMPs may include silt fence, hay bales, turbidity barriers, and ditch blocks. See Section 5.4.13 Construction for more information.

It is estimated that the portion of the bridge over the BHST will take 20 weeks to construct. During this time, the contractor will be required to maintain access and/or provide a detour. See Section 5.3.3. 4(f) for more information.

Comment: Alternative 2a: This alternative is within close proximity to a portion of BHST that is incorrectly labelled "greenways" and not state park lands. This alternative is close to 124 acres of BHST outlying the trail corridor, and pond siting may pose impacts to wetlands or other areas of BHST.

Response: The GIS layer labeled 'Grnwys, ConsEsmnt, WldlfMgmnt' is a combination of all 'protected' lands within the project area. These include parks, forests, greenways, management areas, FL Forever lands, etc. to reflect areas on maps that are protected. We will rename the layer to protected lands in future illustrations to better suit its function.

Existing outfall locations will be maintained to ensure current drainage patterns will remain, reducing the potential for impacts to adjacent lands.

Comment: Alternative 3a: It appears that this alternative aligns/overlaps with the trail corridor in certain areas, which would potentially impact recreational use of the trail along that portion of the route and the corresponding function as a wildlife habitat corridor. Will the final project design provide for continued use of a trail and a corridor in that area?

- Response: This alternative was discounted early during the PD&E study due to property purchased within the corridor utilizing Florida Forever funds. It will not be continued to design.
- Comment: Alternative 4b: This alternative appears to aligns/overlaps with BHST lands in certain areas and eliminate the BHST at the southern terminus of the trail. This could impact recreational use of the trail and the wildlife habitat corridor. Will the final project design provide for continued use of a trail and a corridor in that area?
- Response: This alternative was discounted early during the PD&E study due to Water Management District lands within the Blackwater River. It will not be continued to design.
- Comment: Section 2.2.2: Please add language regarding the Florida Greenways and Trails System (FGTS) in this section, and/or others as appropriate: *The BHST and Historic SR 1 Trail serve as a conceptual network within a statewide system. This effort is called the Florida Greenways and Trails System (FGTS). The FGTS Network is meant to establish a regionally connected system of greenways and trails through a priority network, based off of opportunity corridors. Under this system, local governments have shared their unique vision to connect trails to one another throughout the state. While the connection from the Historic SR 1 Trail to the BHST is not on the priority network, it serves as a vital connection between the two priorities lines on the statewide network.*
- Response: This wording was added to Section 2.2.2, Multi-modalism, of the Environmental Impact Statement as requested.
- Comment: Section 4.3 – Cultural Resources: Page 4.8 of the EIS states, “The BHST is an 8.02 mile recreational trail and conservation land managed by the Florida Department of Environmental Protection (FDEP) Office of Greenways and Trails.” While this statement was correct in previous years, management has since changed to District 1 of the Division of Recreation and Parks within the Florida Department of Environmental Protection. OGT recently merged with this division.
- Response: The EIS was updated to include the changed management entity.
- Comment: Section 4.3.1 – Section 4(f): Please remove “Office of Greenways and Trails” as a management entity and leave FDEP “Division of Recreation and Parks, District 1 Office.” Old SR 1 Trail is also considered a part of the FGTS; Paragraph 2 does not mention this detail.
- Response: The EIS was updated to include the changed management entity.
- Comment: Section 5.3.2 – Recreation and Parkland: Same issues as above, management entity.
- Response: The EIS was updated to include the changed management entity.

Comment: Section 4.10 – Wildlife and Habitat: Staff advises that the primary purpose of the Ecological Greenways Network (EGN) is to support connectivity between natural areas using a set of criteria to establish the statewide network. The EGN criteria uses existing ecosystem data, wildlife migration habits and populations, disturbance regimes, and many others to rank locations on a scale of one to six, with one being the highest priority. While the EGN is also meant to guide acquisition and planning projects, it can also be used in evaluation of projects that transect the Ecological Network. Of note, the study area in question is a level 2 link within the EGN. There are many possible effects of this project on the wildlife in the area due to the development of this road project. Due consideration should be given to the criteria used within the EGN to mitigate impacts on wildlife, especially on endangered species.

Response: The EIS was updated to include information regarding the Ecological Greenways Network. **Section 4.10 Wildlife and Habitat** under ***Affected Environment*** introduced the EGN in the document, and the following was added to **5.4.10 Wildlife and Habitat** under ***Environmental Consequences***:

“As stated under ***Affected Environment*** in **Section 4.10, Wildlife and Habitat**, both alternatives transverse an area that is considered a type 2 link in the Florida Ecological Greenways Network. The criteria reviewed for the EGN during the prioritization process include: maintaining or restoring populations of wide ranging species; maintaining a statewide, connected reserve network from south Florida to the Panhandle; landscape linkages for connectivity, especially higher priority linkages; and importance of riparian corridors to protect water resources and connectivity.

The proposed alternatives were designed to minimize fragmentation of wildlife movement and habitat, as well effects on river hydraulics, the river floodplain, and flow patterns. A structure is proposed for both alternatives over the waterway and entire floodway of the Blackwater River continuing northwest to also include bridging over the salamander habitat. In addition, a structure is also proposed over the waterway and entire floodway of Clear Creek. The proposed bridges include over a mile of structure and will allow for habitat connectivity in an effort to minimize indirect impacts to wildlife movement. Wetlands connectivity in other areas will be preserved with cross drains located under the proposed roadway. These drainage structures will be evaluated to determine if additional wildlife connections can be included in the design. Likewise, development is protected on the north side of both alternatives by land use limitations in the county’s comprehensive plan around Whiting Field. The project is also proposed to be a restricted access roadway with an Access Management Class of 5 to further restrict development around the roadway. Following is a summary of the potential impacts and mitigation efforts for this project.”

Thank you for your comments.

Sincerely,

Ms. Milligan
January 12, 2015
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J. Brandon Bruner, P.E.
Environmental Management Engineer