

APALACHICOLA RIVERKEEPER

2 March 2007

Steve Wilson, Project Manager
HDR Engineering
109 Harrison Avenue
Panama City, FL

RE: Northwest Florida Transportation Corridor Authority – Alternatives & Proposed Final Master Plan

Dear Steve:

Thanks for the opportunity to submit these comments and for your help last week and the week before. On behalf of the Board of Directors, staff and the 1,000 members of the Apalachicola Riverkeeper, I submit these comments on the 4 alternatives presented by HDR Engineering as part of Northwest Florida Transportation Corridor Authority (NWFTCA or the Authority) Master Plan Phase process.

I am not sure whether you have seen the letter 1000 Friends of Florida, Florida Wildlife Federation, The Nature Conservancy, and Audubon of Florida sent to Governor Crist last week. I have attached a copy for your review and submission to the Authority. The Apalachicola Riverkeeper supports this letter and believes that the concepts expressed in it apply to the NWFTCA process. We believe planning for growth in the Apalachicola Basin is prudent and requires state, regional and local governments as well as interested citizens and citizen groups, such as the Apalachicola Riverkeeper, to come together to discern, deliberate and decide how to best manage growth and its impacts. We believe it is self-evident that real property development and growth follow roads. By proposing transportation improvements, particularly Alternatives 2 and 4, which will have original impacts to natural resources and community culture and will seed trends for land development, HDR Engineering and the Authority are in effect stepping into the role of the Florida Department of Community Affairs, the Apalachee Regional Planning Council, the local governments of the Apalachicola Basin and the citizens of the region as the proper progenitors of growth management planning. We do not believe this is a wise course of action.

In addition, we request that the Authority refrain from approving the Final Master Plan that HDR Engineering will present on 15 March 2007, in Pensacola. We request that the citizens of the Apalachicola Basin be allowed ample opportunity to review the proposed Final Master Plan prior to the Authority casting its vote. Yes, we have been allowed to review the “alternatives” – however, as you and the Authority know, it is the Final Master Plan that the Legislature charged the Authority to create and that will set the tone for the future. As you have publicly stated, you anticipate that the proposed Final Master

Plan will be composed of pieces and parts pulled from each of the alternatives. Thus, no one in the public will have an opportunity to review and comment on the actual proposal you will make to the Authority. By this process you and the Authority are effectively denying the public the opportunity to participate in the most crucial and important part of the process. Please refer to the Authority's commitment in Goal E, where it lists the objective to "provide for **early, continuing, timely, and proactive** opportunities in the Master Plan process for the public to express their views and become educated on the issues and potential solutions". Does the absence of an opportunity to review the proposed Final Master Plan square up with that objective?

Furthermore, in Goal D, the Authority states that one of its objectives is to "Improve transportation access to rural and economically distressed counties and communities in the northwest Florida region ...in a manner that reflects regional and community visions". Neither the Apalachicola Riverkeeper nor the public at large has been privy to any visioning related to the proposed corridor. Has visioning occurred out of public view? Has it occurred at all? If not, how will or how has HDR Engineering or the Authority come to understand the "regional and community visions"? In addition, why were no public workshops held in Apalachicola, Eastpoint, or Carrabelle, the three cities of the Apalachicola Basin that will be most impacted?

In this vein we will promote an initiative for the Florida Department of Community Affairs, the regional planning councils, the local governments, and most important, the citizens of the region to come together to create a collaborative vision of how road building fits into a well conceived "regional and community vision" before going forward with a Final Master Plan.

Were seasonal variations in volume taken into account in the traffic projection studies? Surely you are not projecting full volume use of the roads of the Apalachicola Basin as the standard for future road building and growth? We believe the "regional and community visions" of many, many of the people of the Apalachicola Basin includes vision where the presently existing character of the region continues for the foreseeable future. Not everyone is interested in growth regardless of cost, nor is everyone convinced that the reality of life and growth in the western panhandle and central and south Florida is the desired vision for the Apalachicola Basin. It is crucial that HDR Engineering assess realistic, actual traffic volumes and patterns and accurately assess the desires of folks in the region when planning for the future. By your own projections, population growth in Franklin County, Florida will be relatively modest – resist the temptation to speed it up with maxed out traffic volumes.

From reviewing the exhibits and conferring with you at the Crawfordville workshop it is apparent HDR Engineering does not consider alternatives 1 and 3 as viable. Once again, are you certain that this fits with the "regional and community visions" and if so, how did you come to this conclusion? Please realize that the near complete, near intact natural areas, such as the partially restored Tate's Hell State Forest, just north of the coast are a major, vital and essential component of what makes the Apalachicola Basin what it is.

Certainly, Alternatives 2 and especially 4 are entirely out of sync with the present, and I would argue, desired character of the region.

We have noted the Goal A objectives to reduce overall network travel time in the eight-county region by at least 20% over the no-build condition for year 2030 and to pave the way for a 4-hour latitudinal traverse across the eight county region. We believe that this concept, especially as expressed in the creation of entirely new segments, such as Alternative 2 and 4, north of the current path of US Highway 98, flies in the face of our community character.

We recommend rerouting and reconstructing the vulnerable areas of the current US Highway 98. Though this would entail a sizeable amount of construction activity, it fits with “No Build” Alternative 1. If required to choose, we would favor a combination of Alternatives 1 and 3 for the Apalachicola Basin. Alternative 1 provides the needed upgrades, improvements and rerouting of existing US Highway 98 to avoid highly vulnerable areas. Alternative 3 provides the capacity to more efficiently accommodate east/west traffic across the Basin without the construction of new roads in the lower basin, thus relieving some of the pressure of east/west traffic in the lower basin and preserving natural resources. Many of the through-traffic folks who use US Highway 98 use it for the scenery not for the speed; if the goal is speed – plan for it along existings corridor best suited and already used for that purpose – Interstate 10 and State Road 20. We believe that the combination of Alternatives 1 and 3 would best satisfy the need for hurricane evacuation improvements and shield the road from direct impacts from storms while causing minimal negative impacts to natural resources and community character.

Nonetheless, I shall restate that we believe the wisest choice would be for the bona fide governmental planning agencies and interested citizens and groups to engage in practical planning for the Apalachicola Basin, with road building as one component to be considered, rather than allowing road building to lead the process.

In summary, the Apalachicola Riverkeeper is concerned that the Authority may have lost the thread given by the Florida Legislature to “develop methods of building partnerships with local governments, other state and federal entities, the private-sector business community, and the public in **support** of corridor improvements”. This has not been obtained with the public or with governmental planning agencies. We do support needed upgrades for reliable and safe hurricane evacuation; however, these upgrades and any transportation systems should result in minimal impacts to natural resources, maintain community character, and support community visions.

I will submit these comments via email, fax and US mail.

All the best,

Andrew Jubal Smith, Executive Director

CC: Governor Charlie Crist
Stephanie Kopelousos, DOT Interim Secretary
Tom Pelham, DCA Secretary
Mile Sole, DEP Secretary.

