Richard Sommerville
PO Box 5940
Hudson, FL 34674-5940

Sent via email

December 13, 2019

Shayne Hayes
Pensacola Permits Section
41 N. Jefferson St.
Suite 301
Pensacola, FL 32502

Re: Permit Application No. SAJ-2011-00551 (SP-TSH)
Ridge Road Extension

Dear Shayne Hayes:

Please add this comment to the administrative record.

My 11-22-19 comment[1] stated that Tower Road was partially constructed at this time and that environmental impacts to date should not count as environmental impacts going forward when comparing alternatives. The example I gave in this previous comment was – wetlands along US 41 that were considered RRE impacts previous to 2011, were subsequently, in the 2011 Public Notice, considered impacted by others.[2]

In the 2015 Alternatives Analysis no part of Tower Road was considered constructed. I think of Alternatives Analyses as snap shots in time. Additional lanes added to that snap shot should be considered as satisfying the project purpose. Since Tower Road was considered practicable by the Corps in 2013,[3] and the 2015 Alternatives Analysis started with zero lanes constructed, the Corps should consider any subsequently constructed lanes as satisfying the project purpose.

Dan Rametta, in his comments, calculated the Tower Road wetland impacts already impacted as of 2019. He also calculated the remaining future impacts that should be used to compare to other alternatives.

The bulk of this comment includes aerial photographs from Google Earth or Google Maps to prove in the administrative record that part of Tower Road now exists. The existing Tower Road west of the Suncoast Parkway has been renamed Rangeland Blvd.

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[1] See "RRE-Practicability Comment-11-22-19"
[2] See "Exhibit A-US 41 Wetlands Impacted by Others.pdf," Additional Alternative Analysis-Appendix-H2_PhII_WetlandImpactMinimization.pdf, 2011 Public Notice, Pgs 1, 3, 4, and 14 of 37
[3] See "RRE-Practicability Comment-11-22-19," "Exhibit A-8-8-13 Letter," Tori White for Donald W. Kinard

In addition, looking at the aerial exhibits, it is noticeable that much of the right of way has been cleared of vegetation and degraded by construction activities. This shows that Tower Road would have even less environmental impacts going forward than Dan Rametta or I are stating.

The following exhibits are the aerial photographs sent via email and included with this comment.[4]

Exhibit B-Rangeland-SR 54-Starkey-1-9-19, Google Earth
Exhibit C-Starkey Blvd-Rangeland Blvd-Google Maps
Exhibit D-Starkey Blvd-Rangeland Blvd-Night Star Tr-Google Maps
Exhibit E-Night Star Tr-Rangeland Blvd-Long Spur-Google Maps
Exhibit F-Long Spur-Rangeland Blvd-Rail Spur-Google Maps
Exhibit G-Rail Spur-Rangeland Blvd-Gunn Hwy-Cattle Gap Trl-Google Maps
Exhibit H-Suncoast Parkway-SR 54-Bexley Village Dr-Google Maps
Exhibit I-Suncoast Parkway-Bexley Village Dr-Tower Road-Google Maps
Exhibit J-Bexley Village Dr-Tower Rd-Google Maps
Exhibit K-Bexley Village Dr-Tower Rd-Ballantrae Blvd-Google Maps
Exhibit L-Tower Rd and Ballantrae-Google Maps
Exhibit M-Tower Rd-Sunlake Blvd-Google Maps

Sinecerely,

Richard Somerville

cc:
Andrew D. Kelley, Colonel, Jacksonville Corps
Shawn Zinszer, Corps Regulatory Chief
Cynthia Vanderwiele, EPA
Annie Dziergowski, USFWS
Jacob A. Siegrist, Corps
Edgar W. Garcia, Corps

[4] Google Earth and Google Maps, Accessed 11-22-19 through 12-8-19