

ATTACHMENT 2

Letter from Barbara Okorn, EPA, to Melissa Nash, Army Corps of Engineers (June 11, 2019)
("Okorn Letter (June 11, 2019)")

From: [Okorn, Barbara](#)
To: [Nash, Melissa A CIV USARMY CENAO \(US\)](#)
Cc: [Kubico, Stephanie](#); [Frost, Mack \(FHWA\)](#)
Subject: Nimmo Road Phase VIB Purpose and Need
Date: Tuesday, June 11, 2019 4:42:48 PM

Melissa,

Thank you for the opportunity to review the Purpose and Need for the proposed project. It is our understanding that the project will be administered at a local level, but may initiate the NEPA process in the future. Based on our review, we have the following suggestions:

- Background information is provided describing the history of the project area, but the document does not mention the already permitted activities proposed for Sandbridge Road. We suggest these be included in the discussion.
- We suggest the project purpose and need be further clarified. The stated need is to “provide reliable access and connectivity to the Sandbridge community”. There are other issues identified throughout the document- emergency response, limitations of using military property, flooding, safety, accidents, congestion, a narrow 2 lane existing roadway, etc. The purpose and need statement is important because it helps explain why a proposed action is being undertaken, the objectives the project intends to achieve, and the measures to determine how well alternatives meet needs. The purpose of the proposed action is typically the specific objectives of the activity. The need should explain the underlying problem.
- Based on the information provided and the project corridor depicted, it seems that the range of alternatives evaluated is being limited in this assessment. For example, since part of Sandbridge Road is being upgraded and elevated and a bridge is being elevated, possible alternatives to consider may be addressing the remaining portion of Sandbridge Road (which is outside of the depicted project corridor). Evaluating planned activities that may address improvement goals (safety, flooding, etc) and evaluating alternative approaches to meeting the area’s need, will strengthen the planning and decision-making process. It is recommended that a larger study area be considered to be able to assess factors in the area.
- It is important to identify resources from the natural and human environment in the area. Approaches to avoid and minimize impacts to high quality resources should be considered. Preserving functions of the resource, for instance wetland function in flood mitigation, can be incorporated into the project purpose.
- Is pedestrian/ bike traffic a need for this proposed project? It is our understanding that it is part of the Sandbridge project. If so, it should be discussed.

We look forward to working with you and the project team as the proposed project advances. Please let me know if you have any questions.

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