

From: gelianip
To: crc_hcp@fws.gov
Subject: Coral Reef Commons
Date: Friday, May 12, 2017 5:57:58 PM

David Dell
U.S. Fish and Wildlife Service
Southeast Region, Ecological Services
[1875 Century Boulevard](#)
[Atlanta GA 30345](#)

And

Ashleigh Blackford
South Florida Ecological Services Office
[1339 20th Street](#)
[Vero Beach FL 32960](#)

Good Afternoon,

The development and management of the Coral Reef Preserve under the proposed HCP is the best hope for preservation of this habitat.

I am writing in support of the Habitat Conservation Plan (HCP) by Coral Reef Commons. The opportunity for jobs and a common sense housing development is crucial for this area.

This plan will provide the necessary management to conserve the endangered species present from now and far into the future.

I hope you will approve the plan.

Thank you

Geliani Perez

From: [Kenneth Setzer](#)
To: crc_hcp@fws.gov; David_dell@fws.gov; [Ashleigh Blackford](#); [Ken Warren](#)
Subject: Coral Reef Commons HCP
Date: Friday, May 12, 2017 4:22:26 PM

Hello,

I urge you to please resist and oppose any and all destruction in the proposed Coral Reef Commons in Miami, Florida. It is a horrendous idea and a terrible burden to all in a typical underhanded South Florida business deal that benefits the developer and few others, not the natural community certainly and not the human community.

Thank you,

Kenneth Setzer

From: [Darren Cook](#)
To: crc_hcp@fws.gov
Subject: Coral Reef Commons HCP: Bad Deal for Species
Date: Saturday, May 13, 2017 6:31:55 PM

I'm writing to request you to provide pine rocklands plants and animals with the protections they urgently need to survive extinction. As you know, many of these species are found only in endangered pine rockland forests -- including the acres slated for the development of Coral Reef Commons.

The development project's promise to preserve some pine rockland habitat isn't good enough. The loss of this precious land could be a death sentence for many of these species, and the proposed habitat conservation plan doesn't account for the fact that, for some of the species, there's simply nowhere else to live. Nor does it explain how the Service will achieve its mandate of ensuring that these animals and plants not only survive but recover to the point where the protections of the Endangered Species Act are no longer needed.

Furthermore, I was disappointed to learn that despite tremendous public opposition to this project and support for the pine rockland forest habitat and its species, the Service declined to host a public hearing on the proposal. Please reconsider this misstep and give the public an opportunity to learn more about our amazing wildlife and the threats against them.

We don't need more development in South Florida. We do need to protect our wildlife -- including imperiled plants, beetles and butterflies -- and their forest home from vanishing.

Thank you,

Darren Cook



From: [Patricia Ferguson](#)
To: crc_hcp@fws.gov
Subject: Coral Reef Commons HCP: Bad Deal for Species
Date: Saturday, May 13, 2017 6:31:12 AM

I'm writing to request you to provide pine rocklands plants and animals with the protections they urgently need to survive extinction. As you know, many of these species are found only in endangered pine rockland forests -- including the acres slated for the development of Coral Reef Commons.

The development project's promise to preserve some pine rockland habitat isn't good enough. The loss of this precious land could be a death sentence for many of these species, and the proposed habitat conservation plan doesn't account for the fact that, for some of the species, there's simply nowhere else to live. Nor does it explain how the Service will achieve its mandate of ensuring that these animals and plants not only survive but recover to the point where the protections of the Endangered Species Act are no longer needed.

Furthermore, I was disappointed to learn that despite tremendous public opposition to this project and support for the pine rockland forest habitat and its species, the Service declined to host a public hearing on the proposal. Please reconsider this misstep and give the public an opportunity to learn more about our amazing wildlife and the threats against them.

We don't need more development in South Florida. We do need to protect our wildlife -- including imperiled plants, beetles and butterflies -- and their forest home from vanishing.

Thank you,

Patricia Ferguson


From: elaline_risch
To: crc_hcp@fws.gov
Subject: Coral Reef Commons HCP: Bad Deal for Species
Date: Friday, May 12, 2017 8:16:32 PM

I'm writing to request you to provide pine rocklands plants and animals with the protections they urgently need to survive extinction. As you know, many of these species are found only in endangered pine rockland forests -- including the acres slated for the development of Coral Reef Commons.

The development project's promise to preserve some pine rockland habitat isn't good enough. The loss of this precious land could be a death sentence for many of these species, and the proposed habitat conservation plan doesn't account for the fact that, for some of the species, there's simply nowhere else to live. Nor does it explain how the Service will achieve its mandate of ensuring that these animals and plants not only survive but recover to the point where the protections of the Endangered Species Act are no longer needed.

Furthermore, I was disappointed to learn that despite tremendous public opposition to this project and support for the pine rockland forest habitat and its species, the Service declined to host a public hearing on the proposal. Please reconsider this misstep and give the public an opportunity to learn more about our amazing wildlife and the threats against them.

We don't need more development in South Florida. We do need to protect our wildlife -- including imperiled plants, beetles and butterflies -- and their forest home from vanishing.

Thank you,

elaline risch


From: [Jenna Miles](#)
To: crc_hcp@fws.gov
Subject: Coral Reef Commons HCP: Bad Deal for Species
Date: Friday, May 12, 2017 9:24:21 AM

I'm writing to request you to provide pine rocklands plants and animals with the protections they urgently need to survive extinction. As you know, many of these species are found only in endangered pine rockland forests -- including the acres slated for the development of Coral Reef Commons.

The development project's promise to preserve some pine rockland habitat isn't good enough. The loss of this precious land could be a death sentence for many of these species, and the proposed habitat conservation plan doesn't account for the fact that, for some of the species, there's simply nowhere else to live. Nor does it explain how the Service will achieve its mandate of ensuring that these animals and plants not only survive but recover to the point where the protections of the Endangered Species Act are no longer needed.

Furthermore, I was disappointed to learn that despite tremendous public opposition to this project and support for the pine rockland forest habitat and its species, the Service declined to host a public hearing on the proposal. Please reconsider this misstep and give the public an opportunity to learn more about our amazing wildlife and the threats against them.

We don't need more development in South Florida. We do need to protect our wildlife -- including imperiled plants, beetles and butterflies -- and their forest home from vanishing.

Thank you,

Jenna Miles


From: [Claire Chambers](#)
To: crc_hcp@fws.gov
Subject: Coral Reef Commons HCP: Bad Deal for Species
Date: Friday, May 12, 2017 12:55:55 AM

I'm writing to request you to provide pine rocklands plants and animals with the protections they urgently need to survive extinction. As you know, many of these species are found only in endangered pine rockland forests -- including the acres slated for the development of Coral Reef Commons.

The development project's promise to preserve some pine rockland habitat isn't good enough. The loss of this precious land could be a death sentence for many of these species, and the proposed habitat conservation plan doesn't account for the fact that, for some of the species, there's simply nowhere else to live. Nor does it explain how the Service will achieve its mandate of ensuring that these animals and plants not only survive but recover to the point where the protections of the Endangered Species Act are no longer needed.

Furthermore, I was disappointed to learn that despite tremendous public opposition to this project and support for the pine rockland forest habitat and its species, the Service declined to host a public hearing on the proposal. Please reconsider this misstep and give the public an opportunity to learn more about our amazing wildlife and the threats against them.

We don't need more development in South Florida. We do need to protect our wildlife -- including imperiled plants, beetles and butterflies -- and their forest home from vanishing.

Thank you,

Claire Chambers



From: [Marcy Chamblin](#)
To: crc_hcp@fws.gov
Subject: Coral Reef Commons HCP: Bad Deal for Species
Date: Thursday, May 11, 2017 2:17:27 PM

I'm writing to request you to provide pine rocklands plants and animals with the protections they urgently need to survive extinction. As you know, many of these species are found only in endangered pine rockland forests -- including the acres slated for the development of Coral Reef Commons.

The development project's promise to preserve some pine rockland habitat isn't good enough. The loss of this precious land could be a death sentence for many of these species, and the proposed habitat conservation plan doesn't account for the fact that, for some of the species, there's simply nowhere else to live. Nor does it explain how the Service will achieve its mandate of ensuring that these animals and plants not only survive but recover to the point where the protections of the Endangered Species Act are no longer needed.

Furthermore, I was disappointed to learn that despite tremendous public opposition to this project and support for the pine rockland forest habitat and its species, the Service declined to host a public hearing on the proposal. Please reconsider this misstep and give the public an opportunity to learn more about our amazing wildlife and the threats against them.

We don't need more development in South Florida. We do need to protect our wildlife -- including imperiled plants, beetles and butterflies -- and their forest home from vanishing.

Thank you,

Marcy Chamblin



From: sonia.santos
To: crc_hcp@fws.gov
Subject: Coral Reef Commons HCP: Bad Deal for Species
Date: Wednesday, May 10, 2017 3:52:46 PM

I'm writing to request you to provide pine rocklands plants and animals with the protections they urgently need to survive extinction. As you know, many of these species are found only in endangered pine rockland forests -- including the acres slated for the development of Coral Reef Commons.

The development project's promise to preserve some pine rockland habitat isn't good enough. The loss of this precious land could be a death sentence for many of these species, and the proposed habitat conservation plan doesn't account for the fact that, for some of the species, there's simply nowhere else to live. Nor does it explain how the Service will achieve its mandate of ensuring that these animals and plants not only survive but recover to the point where the protections of the Endangered Species Act are no longer needed.

Furthermore, I was disappointed to learn that despite tremendous public opposition to this project and support for the pine rockland forest habitat and its species, the Service declined to host a public hearing on the proposal. Please reconsider this misstep and give the public an opportunity to learn more about our amazing wildlife and the threats against them.

We don't need more development in South Florida. We do need to protect our wildlife -- including imperiled plants, beetles and butterflies -- and their forest home from vanishing.

Thank you,

sonia.santos
amadora



From: [Andrea Cuccaro](#)
To: crc_hcp@fws.gov
Subject: Coral Reef Commons HCP: Bad Deal for Species
Date: Wednesday, May 10, 2017 11:21:54 AM

I'm writing to request you to provide pine rocklands plants and animals with the protections they urgently need to survive extinction. As you know, many of these species are found only in endangered pine rockland forests -- including the acres slated for the development of Coral Reef Commons.

The development project's promise to preserve some pine rockland habitat isn't good enough. The loss of this precious land could be a death sentence for many of these species, and the proposed habitat conservation plan doesn't account for the fact that, for some of the species, there's simply nowhere else to live. Nor does it explain how the Service will achieve its mandate of ensuring that these animals and plants not only survive but recover to the point where the protections of the Endangered Species Act are no longer needed.

Furthermore, I was disappointed to learn that despite tremendous public opposition to this project and support for the pine rockland forest habitat and its species, the Service declined to host a public hearing on the proposal. Please reconsider this misstep and give the public an opportunity to learn more about our amazing wildlife and the threats against them.

We don't need more development in South Florida. We do need to protect our wildlife -- including imperiled plants, beetles and butterflies -- and their forest home from vanishing.

Thank you,

Andrea Cuccaro


From: [Sue White](#)
To: crc_hcp@fws.gov
Subject: Coral Reef Commons HCP: Bad Deal for Species
Date: Tuesday, May 09, 2017 6:23:35 PM

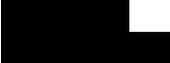
I'm writing to request you to provide pine rocklands plants and animals with the protections they urgently need to survive extinction. As you know, many of these species are found only in endangered pine rockland forests -- including the acres slated for the development of Coral Reef Commons.

The development project's promise to preserve some pine rockland habitat isn't good enough. The loss of this precious land could be a death sentence for many of these species, and the proposed habitat conservation plan doesn't account for the fact that, for some of the species, there's simply nowhere else to live. Nor does it explain how the Service will achieve its mandate of ensuring that these animals and plants not only survive but recover to the point where the protections of the Endangered Species Act are no longer needed.

Furthermore, I was disappointed to learn that despite tremendous public opposition to this project and support for the pine rockland forest habitat and its species, the Service declined to host a public hearing on the proposal. Please reconsider this misstep and give the public an opportunity to learn more about our amazing wildlife and the threats against them.

We don't need more development in South Florida. We do need to protect our wildlife -- including imperiled plants, beetles and butterflies -- and their forest home from vanishing.

Thank you,

Sue White


From: [Joseph Konig](#)
To: crc_hcp@fws.gov
Subject: Coral Reef Commons HCP: Bad Deal for Species
Date: Saturday, May 13, 2017 11:22:24 PM

I'm writing to request you to provide pine rocklands plants and animals with the protections they urgently need to survive extinction. As you know, many of these species are found only in endangered pine rockland forests -- including the acres slated for the development of Coral Reef Commons.

The development project's promise to preserve some pine rockland habitat isn't good enough. The loss of this precious land could be a death sentence for many of these species, and the proposed habitat conservation plan doesn't account for the fact that, for some of the species, there's simply nowhere else to live. Nor does it explain how the Service will achieve its mandate of ensuring that these animals and plants not only survive but recover to the point where the protections of the Endangered Species Act are no longer needed.

Furthermore, I was disappointed to learn that despite tremendous public opposition to this project and support for the pine rockland forest habitat and its species, the Service declined to host a public hearing on the proposal. Please reconsider this misstep and give the public an opportunity to learn more about our amazing wildlife and the threats against them.

We don't need more development in South Florida. We do need to protect our wildlife -- including imperiled plants, beetles and butterflies -- and their forest home from vanishing.

Thank you,

Joseph Konig


From: [Al Sunshine Gmail](#)
To: crc_hcp@fws.gov
Cc: [Ashleigh Blackford](#); David_dell@fws.gov
Subject: Coral Reef Commons Proposed HCP/ITP
Date: Saturday, May 13, 2017 5:28:34 PM

As a long time Miami Dade resident living across from the Richmond Pine Rocklands for some 3 decades, I urge the U-S Fish and Wildlife Service to DENY the Coral Reef Commons/Ram/University of Miami proposed Habitat Conservation Plan.

The FWS itself lists “Fragmentation” caused by local development as a major threat to Pine Rocklands Habitats in th United States, which are now down to their last 1.5% according to the most recent surveys of the USGS.

In addition, the Pine Rocklands are considered a Critically Imperiled Habitat, home to more than a dozen Rare, Threatened and Federally-Protected Plants and Animals.

The once thought extinct Miami Tiger Beetle is only found in Pine Rocklands around the Richmond Pine Rocklands, and this project could place it in jeopardy of extinction.

In addition, the Florida Bonneted Bat uses this Habitat as part of territory and there;s NO MENTION of any impact the additional Traffic, Lights and Human Activity would have on this Federally-Protected species.

1. The developer’s “science” is flawed and incomplete. Most of the endangered animals known or suspected to be on the site (the two butterflies, the beetle and the two snakes) were not properly surveyed for.
2. Their proposed mitigation is inadequate. Mitigation lands should be in ratio of at least 5:1 (protected areas : developed areas). The proposed mitigation ratio is at best 1.23 acres of preserved land for every acre of development. This is not within the "range of reason" esp. when compared to other HCPs, especially for a project contemplates the loss of a material portion of a globally-imperiled ecosystem, which is designated “Critical Habitat” for several species.
3. Burning is crucial but impossible. The proposed mitigation on what little land is being “preserved” and managed is a pine land and depends entirely on a robust and periodic fire regime, which is not feasible, especially with @2000 people (900 apts.), a Walmart , and a public school, all in immediate proximity to the areas which must be burned. As noted in the HCP, mechanical and/or chemical maintenance of pinelands is not an adequate substitute for fire.
4. "No Good Alternatives." All six of the proposed alternatives are fundamentally flawed because they do not provided sufficient mitigation for the damage to be done to this globally-imperiled habitat, and except forfor Alternative 1 (No Action Alternative) are either "straw men", or in the case of Alternative 6 (Preferred Alternative) seek to get mitigation credit for property which is already under a conservation easement (the so-called "Off-site Mitigation Area").
5. "Success” is illusory. The developer’s definition of “success” in mitigation is self-defined and not scientifically based: Their Habitat Value Units (HVUs) are “funny money.”
6. No penalty for failure. The developer's “success criteria” for restoration and maintenance of the preserves have no realistic penalty for failure. The developer gets to destroy a globally-

imperiled resource (their words) and “take” the endangered species, without any material financial risk or penalty, even if they fail to achieve their weak definition of “success.”

7. Failing grade for UM. By their consultant’s own admission, the Univ. of Miami has been a poor steward of the subject property, which was originally given to them by the federal govt. for educational purposes! Current Deed restrictions on the land prohibit any development anyways. Now UM wants “credit” for restoring a portion of the property, so they can destroy the rest (FOREVER). They should not be rewarded for bad stewardship, and they should not be trusted to protect the resource.

Al Sunshine

President

Miami Pine Rocklands Coalition



From: [norma.gutner](#)
To: crc_hcp@fws.gov
Subject: Coral Reef Commons
Date: Wednesday, May 10, 2017 12:46:22 AM

I am writing in support of the Habitat Conservation Plan (HCP) by Coral Reef Commons. As a long time Miami-Dade County resident I am familiar with this area and if left unattended will only further damage the viability of this habitat. The development and management of the Coral Reef Preserve under the proposed HCP will provide the necessary management to conserve the endangered species present from now and far into the future. I hope you will approve the plan.

Thank you,

Norma Gutierrez

From: [Heriberto Rivera](#)
To: crc_hcp@fws.gov
Subject: Coral Reef Commons
Date: Wednesday, May 10, 2017 12:06:40 AM

I am writing in support of the Habitat Conservation Plan (HCP) by Coral Reef Commons. The development and management of the Coral Reef Preserve under the proposed HCP is the best hope for preservation of this habitat. Right now it is an eyesore filled with trash and actually doing more harm to the environment. This plan will provide the necessary management to conserve the endangered species present from now and far into the future. Additionally it would also provide opportunities for employment and added commercial services. I hope you will approve the plan.

Thank you

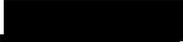
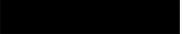
Heriberto Rivera

From: [Michael DiPietro](#)
To: crc_hcp@fws.gov
Cc: [Esther Monzon-Aguirre](#)
Subject: Coral Reef Commons
Date: Monday, May 08, 2017 4:55:18 PM

David Dell
U.S. Fish and Wildlife Service
Southeast Region, Ecological Services
[1875 Century Boulevard](#)
[Atlanta GA 30345](#)
Ashleigh Blackford
South Florida Ecological Services Office
[1339 20th Street](#)
[Vero Beach FL 32960](#)

As a life long resident of South Florida I am very familiar with the area scheduled for development. The development and management of the Coral Reef Preserve under the proposed HCP is a well thought out plan for the preservation of this habitat. I am writing in support of the Habitat Conservation Plan (HCP) by Coral Reef Commons. The opportunity for jobs and a common sense housing development is crucial for this area. This plan will provide the necessary management to conserve the endangered species present from now and into the future. I hope you will approve the plan.

Thank you.

Michael DiPietro
Cell 
Fax 

From: samhanlj@aim.com
To: crc_hcp@fws.gov
Subject: coral reef commons
Date: Tuesday, May 09, 2017 7:05:58 PM

For public comment: please do NOT permit the "Coral Reef Commons"! It will devastate an extremely rare habitat and likely cause the extinction of a number of endangered plant species found nowhere else. This development would be devastating to this already-fragmented habitat. And because of this fragmentation, "mitigation" will not work. The geography and topography of pine rockland cannot be reproduced elsewhere. Please save what little is left.

-Sincerely,

Lauren Johnson



From: [Alana Torraca](#)
To: crc_hcp@fws.gov
Subject: Corral Reef Commons Draft Habitat Conservation Plan
Date: Monday, May 08, 2017 8:49:56 PM

Dear David Dell and Ashleigh Blackford,

I am writing to submit my comment on the proposal to develop land in Miami Dade County, FL, destroying a rare corral reef pine forest to build a 137 acre residential and commercial lot. I believe that the incalculable value of preserving this rare pine rockland outweighs the commercial profit of the developer; its extremely rare plants and endangered animals should be preserved as a wild space to be enjoyed by the public and for scientific research rather than exploited for short term gains. With one third of all shopping malls predicted to close in the near future, it seems particularly shortsighted and foolish to destroy this irreplaceable habitat for something as ephemeral as a shopping mall.

Please add my voice to the many who oppose seeing this incredibly beautiful and diverse habitat disappear under the asphalt of another parking lot.

sincerely,

Alana Torraca



From: [Jennifer Possley](#)
To: crc_hcp@fws.gov
Subject: CRC HCP Comments
Date: Friday, May 12, 2017 5:53:09 PM
Attachments: [Possley CRC HCP comments 12may17.docx](#)

Possley CRC HCP comments (*attached, and also pasted below*)

5/12/17

[Disclaimer: my opinions are my own, and do not reflect those of my employer.]

As a professional working in Miami's urban pine rocklands for over sixteen years (much of that in the Richmond pine rocklands), I am of the opinion that the "Coral Reef Commons" property holds extremely high ecological value, and that the complete acreage is capable of being fully restored to very healthy habitat that is of critical importance to South Florida.

I have carefully read through the Habitat Conservation Plan for Coral Reef Commons. I respectfully disagree with three fundamental tenets of the plan. First, the HCP claims that the proposed development will result in a "net conservation *gain*" for rare plants and animals in Richmond. I do not believe this to be true, and I think the quantitative habitat functional assessment is deeply flawed. Second, in regards to three particular federally listed/petitioned species, due diligence has not been exercised. The HCP is demonstrably going to cause harm (in one case), or has the high probability of causing harm (in two cases). Third, I do not believe that the fire needed to maintain the pine rockland preserves in and adjacent to Coral Reef Commons will be feasible to implement, given the scale of development proposed. I explain these statements further below.

1. Habitat Functional Assessment

-
The HCP proffers a quantitative "habitat functional assessment" for the CRC property (pages 82-90). The author cites my publications (Possley et al. 2014, Possley et al. 2016) in section 5.2. My works are cited because JEI used metrics similar to the ones my co-authors and I used to evaluate whether or not restoration goals were being reached in several different urban pine rockland preserves. In citing our methods, JEI is implying that the metrics we developed are appropriate for ranking some CRC parcels as more worthy of development than others; this is not the case. If I were to develop criteria to evaluate parcels for development vs. preservation, the metrics would be very different, and would take into account the fact that globally endangered pine rockland forests have been nearly wiped out of Miami. Criteria such as "time since fire" and "degree of hardwood invasion" are meaningful in the context of discussing management goals (like in Possley et al. 2014, and Possley et al. 2016), but to use these criteria to prioritize parcels for development is completely inappropriate.

The habitat assessment that JEI developed is most heavily weighted toward each parcel's

cover of canopy, non-native plants, and “pine rockland herbs” (20% for each factor, or 60% of total score). By using these particular metrics to evaluate parcels, the assessment uses to its advantage the property’s history of fire-suppression and lack of exotic vegetation management. If, for example, the habitat assessment instead gave more weight to the presence of federally listed species, the presence of designated critical habitat, presence of butterfly nectar sources, and connectivity, then the scores would be much different, and would likely show that all unpaved areas within the CRC property are highly valuable. A complete habitat functional assessment of the CRC property should be executed which considers all ecological factors—not just ones that support the development goals.

I also object to the characterization of “net conservation gain” that includes the addition of 50.96-acres of off-site mitigation. This off-site property is already under a conservation agreement through deed restriction and including it in the HFA does not change anything, as far as I can discern. To put it more simply, conserving something that is already conserved should not count.

2. Take of listed species: MTB, BHSB, RRCS, tiny polygala & deltoid spurge

As is indicated in the Service’s EA (and alluded to in the HCP), three of the rarest animal species on Earth could potentially suffer negative impacts from the planned development: the Miami tiger beetle (MTB), Bartram’s scrub hairstreak butterfly (BSHB), and the rim rock crowned snake (RRCS). Attempts thus far to establish whether the MTB or the RRCS are present on the property appear to have been far from adequate. BSHB is known to be present on the property.

The HCP (page 56) quotes Dr. Knisely in 2014 saying that “previous surveys [of CRC] provided a pretty good indication that this site was not suitable habitat [for MTB].” I recall that, at that time, similar statements were made about the antenna fields at the US Coast Guard Station, an area in which I spent dozens of hours helping to survey for MTBs in summer 2016. Several biologists (led by Miami-Dade PROS) systematically swept through those fields and found MTBs to be present nearly throughout. That same year, PROS and Zoo staff found that MTBs were completing their life cycles in fire breaks (service roads) between pine rockland parcels at Zoo Miami. Basically, since 2014, the concept of MTB habitat requirements has been turned on its head. We know much more now that we did back then: MTBs can and do complete their life cycle in disturbed areas as well as areas where vegetation is predominantly non-native.

Table 3.1 of the HCP lists the dates when JEI biologists and subconsultants conducted listed species surveys. The majority of these survey dates were conducted during the time of year when MTB is underground and not even possible to detect. It has been well documented (by Dr. Knisely and others) that MTBs go subterranean by the end of September and do not re-emerge until June. USFWS’ own survey guidelines (compiled for PROS in 2016 by USFWS biologist Jeff Howe) state that MTB surveys should not be held after September 15th due to

low detectability. It is concerning to me that only four of JEI's sixteen surveys for listed species occurred during the MTB's known "flight window" (per Table 3-1). Furthermore, it isn't clear if the staff performing the surveys had training on how to identify MTBs or their habitat; this would be a requisite for surveying such a tiny, difficult-to-detect species. This evidence strongly suggests to me that surveys on the CRC property have not been adequate to determine whether MTBs are present (and whether and to what extent "take" of MTBs will occur). As a final point on this topic, it is noteworthy that MTBs seem to require the same soil type as Tiny Polygala: namely, sand deposits. In fact, at Zoo Miami, the MTB and the Tiny Polygala have tightly overlapping ranges. The well-documented presence of Tiny Polygala at CRC (historically in several places, per DERM's 1994 maps) provides a strong argument that MTBs are also likely to be present on property.

BSHB is well known to be present in Richmond, and has been documented on the CRC property (per Figure 3.2 of HCP), despite the fact that surveys were not conducted in the species' peak flight season (spring and summer). "Take" of BHSB, possibly of the bulk of the population on the property, is almost certain to occur from the proposed development. In Figure 3.2, it appears that more than half of the *Croton linearis* datapoints are in the area slated for development. Because BHSB rarely strays more than 5 meters from its larval host plant (per USFWS recovery plan), this strongly suggests that at least half of the population of BHSB could be impacted (i.e., killed) by this development.

Even if the expanse between the two preserve areas did not contain approximately half of the CRC property's *Croton* population, it would be critical for maintaining healthy BHSB populations. First, these areas with few trees and increased sunlight mimic frequently burned pinelands in that (unlike the fire-suppressed forested areas) they contain hundreds of nectar plants that are critical food for adult BHSBs (for example, *Bidens alba*, *Richardia grandiflora*, *Rhynchospora floridensis*, *Metastelma blodgettii*). Once this expanse is developed, the BSHB may be without small nectar flowers until or unless a regular fire regime is established in the preserves, which could take many years to occur (and which I think is extremely unlikely). Besides being a source of nectar plants, the area between the two preserves is critical for BHSB, and for all plants and animals in the preserve, because it allows migration of genes. One big population of BHSB is stronger and therefore less likely to become extirpated than two smaller, genetically isolated ones.

Information about RRCS and its habitat requirements is very sparse. The species is so poorly understood and has such a narrow distribution that the real possibility exists that the CRC development (or any development in Richmond) could have a major negative impact on the species (up to and including extinction), and no one would ever know. Experienced herpetologists need to survey CRC for the presence of these tiny snakes in the appropriate manner and at the appropriate time of year for the species' life cycle.

Regarding listed plant species, Figure 3.5 in the HCP clearly shows that tiny polygala will be impacted by the proposed development. Deltoid spurge was not currently found in the project footprint, but appropriate habitat for this Miami-Dade endemic plant certainly exists in the development footprint (see Map 4, “pine rockland possibly once scraped but with pine canopy” in Appendix D).

3. Fire Suppression

The HCP states (page 114) that prescribed burning will be an important component of the on-site CRC preserves mitigation plan. I agree that this is a good plan, however, it is not realistic to expect that the prescribed fire could be implemented in preserves which surround 900 homes and dozens of businesses. This is because the conditions needed (wind direction, smoke dispersion, etc.) for FFS to safely conduct a burn so close to dense housing will probably only happen once or twice a year. The chances are extremely low that the stars will align so that FFS personnel would be available on the only day(s) when the weather conditions laid out in the burn prescription are met. Without fire, the preserves will require more and more mechanical treatment to keep a structure somewhat similar to a healthy pine rockland. In turn, the understory (including *Polygala smallii*, *Chamaesyce deltoidea*, *Croton linearis*, etc.) will be lost, gaps of bare soil will disappear, and habitat for endangered species will shrink and eventually disappear.

-

Conclusions

-

In conclusion, I reject the HCP claim of “net conservation gain.” I assert that methods used to calculate gain are flawed and there will actually be a net conservation *loss*. If adequate surveys were performed, or if an appropriate functional assessment of habitat was undertaken which accounted for the true ecological value of the area, I believe this project will be shown to cause substantial negative impacts to the 2 federally listed species which are verified to be present in the project area (BSHB, Tiny Polygala), and to the 3 federally listed/petitioned species which are very likely to be present in the project area (MTB, RRCS, deltoid spurge). Clearly, the project will also result in the permanent loss of 86 acres of former pine rockland— a plant community so rare (“globally critically imperiled”) that the next rarest world heritage designation is “extinct.”

Respectfully submitted,

Jennifer Possley, MS

Biologist



This email has been scanned for email related threats and delivered safely by Fairchild Tropical Botanic Garden's email security system.

From: [Jody F](#)
To: crc_hcp@fws.gov; David_dell@fws.gov; Ashleigh_Blackford@fws.gov
Subject: Federal Kill Permits/Pine Rocklands Coral Reef Commons HCP and EA
Date: Friday, May 12, 2017 4:15:29 PM

I am writing in opposition of the federal lill permits for developers that will allow them to bulldoze and destroy our protected Pine Rocklands here in Miami, Fl.

I am disheartened it has come to the public pleading with officials to step back and see how flawed and incomplete the developer's science is with regard to this endangered area. The butterflies, beetles and snakes were not properly surveyed. On any given day you can see observe them in their natural habitat.

Mitigation lands are woefully inadequate. There is no 5:1 ratio of protected area to developed area. It's hovering at 1:1 which falls well below the range of reason relative to other HCPs. This is a globally-imperiled ecosystem which is designated a Critical Habitat. It simply can not be destroyed and replaced with concrete.

The burning is impossible by the proposed standards. Absolutely impossible yet crucial for the rocklands survival. There would be no way to continue a robust and periodic fire regime with nearly 2000 people next door. AND the amount of traffic this project will create is obscene. It already takes 1 solid hour of bumper-to-bumper traffic to drive 10 miles in this area. The HCP has stated that the mechanical and/or chemical maintenance of pinelands is not an adequate substitute for fire.

I would ask that you follow the money. The developer has no material, legally-enforceable obligation(s) (and no funds on deposit or bond) to restore and maintain the natural areas, as outlined in the HCP. A promise is not legally binding.

Success must be scientifically based. The developers idea of success defies science. Further, there is no penalty at all for failure. They can destroy forever a globally-imperiled resource, kill endangered species and there is no financial risk or penalty whatsoever. All for a chicken shop, gym and yet another sprawled development on roads that can't withstand additional traffic.

The University of Miami has been an environmental hazard and poor steward of the subject property. We can not rewarded bad stewardship, and they should not be trusted to protect the resource.

Thank you for taking the time to read my letter.

Please oppose this project. History will look upon you kindly.

Sincerely,

Jody Finver

A black rectangular redaction box covering the signature area.

From: [Ashleigh Blackford](#)
To: crc_hcp@fws.gov
Subject: FW: Coral Reef Commons Draft Habitat Conservation Plan
Date: Thursday, May 11, 2017 8:13:58 AM

From: EarthSave Florida [mailto:infoearthsavemiami@gmail.com]
Sent: Tuesday, May 09, 2017 10:45 PM
To: david_dell@fws.gov; ashleigh_blackford@fws.gov
Subject: Re: Coral Reef Commons Draft Habitat Conservation Plan

Re: Coral Reef Commons Draft Habitat Conservation Plan

Agency/Docket Number: FWS-R4- ES-2016- N223

Document Number: 2017-05767

Dear Mr. David Dell, Regional HCP Coordinator, Atlanta

and Ashleigh Blackford, Supervisory Wildlife Biologist, South Florida Ecological Services

Please give full and serious consideration to the numerous disadvantages of damaging the Pine Rockland and the numerous benefits of preserving it,

Peas In – Peace Out

Jeff 'VeganMan' Tucker

a/k/a Prof. Veghead | Chef Jef | Wiser Adviser

Chairperson, FL Chapter of 501C3 EarthSave Int'l

Text/Vmail/Tel [REDACTED] | JMTUCKER@EARTHSAVEMIAMI.ORG | www.earthsavemiami.org

[REDACTED]

YouTube Channel > tinyurl.com/EarthSaveFlorida-YouTube

MediaKit Downloads > <https://tinyurl.com/EarthSaveMediaKit>

Upload/SharePhotos/Videos > tinyurl.com/Share-Images-to-EarthSave

Donate to 501C3 EarthSave > <https://secure.meetup.com/Earthsave-South-Florida/contribute/>

FL. REGISTERED SOLICITOR # CH47114

Advocating Healthy-Humane-(Holy)Holistic Vegan Lifestyle for People, Animals and (Sacred) Environment

End Global Warming, Dimming and Depletion- One Bite at a Time

'South Florida's Original Public Vegan Dinners & Portal'

Vegetarians eat veggies, Fruitarians... fruit, So what do Humanitarians eat?

From: [Ashleigh Blackford](mailto:Ashleigh.Blackford@fws.gov)
To: crc_hcp@fws.gov
Subject: FW: Dade County Richmond Pine Rocklands Habitat in Dade County
Date: Thursday, May 11, 2017 8:13:26 AM

From: hrg4@aol.com [mailto:hrg4@aol.com]
Sent: Tuesday, May 09, 2017 4:57 PM
To: ashleigh_blackford@fws.gov
Subject: Dade County Richmond Pine Rocklands Habitat in Dade County

Hello Mr. Asheigh Blackford, Let me be brief since this and e-mail. I oppose the development of the Pine Docklands on 152 Street. There are many reasons but let me mention a few. There are less than 2% of these natural habitats left in Dade County which originally extended throughout South Florida. We must protect these areas for our offspring. Many species of insects, plants, and animals are endangered and can only be found in the Rocklands. Finally, 152 Street has congested traffic already. Adding a Walmart and further development will only compound the problem of traffic in the area. Please consider my comments in your decision. Thank you,
Hugh Gilmore IV [REDACTED].

From: [Andrea Villafana](#)
To: crc_hcp@fws.gov
Subject: Fw: HCP Coral Reef
Date: Wednesday, May 10, 2017 9:15:12 AM

To whom it may concern:

I am writing in support of the Habitat Conservation Plan (HCP) by Coral Reef Commons. As a teacher, I want my students to have many experiences with nature. The development and management of the Coral Reef Preserve under the proposed HCP will provide the necessary management to conserve the endangered species present from now and far into the future. I hope you will approve the plan.

Thank you
Andrea Villafana, M. Ed.

From: [Ashleigh Blackford](#)
To: crc_hcp@fws.gov
Subject: FW: Pine Rocklands Conservation
Date: Thursday, May 11, 2017 8:15:48 AM

From: Katherine Abad [mailto:katherina0501@gmail.com]
Sent: Wednesday, May 10, 2017 10:11 AM
To: david_dell@fws.gov; ashleigh_blackford@fws.gov
Subject: Pine Rocklands Conservation

To whom it may concern,

I am writing to you about the Pine Rocklands and my concern regarding their future in South Florida. About 20% of plant species found in these rocklands, cannot be found anywhere else in the world. I am sending this email as a concerned citizen of Dade County, who has been enjoying the amenities the Everglades has to offer since I could remember, like biking at Shark Valley and walking tours around endless acres of mangroves. What will another Walmart do for us? We should better preserve our already diminishing environments and the intricate ecosystems that reside in them. Urban Sprawl has already caused the downfall of million of acres of exotic wildlife all around the world and it is time for that to end. Thank you for your time, and I hope the pending plans of development are not granted, because just like me, millions of citizens not only from Florida, but from all over the world enjoy the Everglades, and nobody would enjoy a giant super center with a Walmart and food amenities.

Katherine Abad.

From: [Blackford, Ashleigh](#)
To: [FW4 CRC_HCP](#)
Subject: Fwd: Coral Reef Commons Concerns
Date: Monday, May 08, 2017 11:47:49 AM

----- Forwarded message -----

From: **EsteeNicole** <esteenicole13@gmail.com>
Date: Mon, May 8, 2017 at 10:39 AM
Subject: Coral Reef Commons Concerns
To: ashleigh_blackford@fws.gov

Ms. Ashleigh Blackford

US Fish and Wildlife Services

South Florida Ecological Services

1339 20th St.

Vero Beach, FL 39260

Miami, May 8, 2017

Dear Ms. Blackford:

I am currently writing to you in order to express my concern for the development known as Coral Reef Commons, a part of a larger pine rockland parcel known as the Richmond Pineland Complex that encompasses Zoo Miami, University of Miami property, U.S. Coast Guard property, the Luis Martinez Army Reserve Base, the Robert Morgan Vocational School, and a large Miami-Dade County Park called Larry &

Penny Thompson Park.

I am a Conservation Teen Scientist for Zoo Miami and have been given extensive knowledge of the areas and habitats surrounding our zoo, such as the rock pinelands, and the importance of their biodiversity. The importance of this critically imperiled habitat is unprecedented, and I urge you not to allow the development of the 158,000-square-foot Walmart, an LA Fitness facility, Chick-fil-A and Chili's restaurants, and about 900 apartments. The developer is highly aware that the Florida rock pinelands houses a multitude of species that are not found anywhere else on Earth, and yet are still moving forward with development plans despite the threat this poses to these species.

The rock pinelands have shrunk to about two-percent of its historic territory, and there are multiple species at risk of extinction, amongst those, which include the Florida bonneted bat. This species was once thought to be extinct, but are now known to use the pine rocklands for foraging. Another species thought to be extinct was the Miami tiger beetle. After not having been observed for 50 years, it was rediscovered residing in the pine rocklands. Other

species at risk include Bartram's scrub-hairstreak butterfly, the Florida brickell-bush, and Carter's small flowered flax.

As a biologist with extensive knowledge on the importance of habitat and biodiversity preservation, I hope you can agree that the destruction of Florida's pine rocklands, some of the most imperiled lands in the world, is detrimental to our moral responsibility to protect biodiversity and the world we live in. We have to remember that we do not exist apart from nature, but are part of a wider creation. This habitat has a right to exist. These endangered species that reside in these lands have a right to exist, just as we do. When we choose profit and economical gain over the protection of a land that is now regarded as critically imperiled globally, we show to the rest of the world that we do not value the same lands that have sustained every single citizen's needs and that have given us all life. As Mahatma Gandhi said, *"What we are doing to the forests of the world is but a mirror reflection of what we are doing to ourselves and to one another."*

In short, this development is unacceptable on a number of issues and should be denied. I hope you will listen to the public concerns and more fully discuss the impacts of Coral Reef Commons on federal and state endangered and threatened species through public hearings. I look forward to your reply.

Sincerely,

Estee Arias

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Ashleigh Blackford

U.S. Fish and Wildlife Service

Supervisory Wildlife Biologist

Planning & Resource Conservation - East

South Florida Ecological Services Office

1339 20th Street - Vero Beach, FL 32960

phone: [REDACTED]

ashleigh_blackford@fws.gov

NOTE: This email correspondence and any attachments to and from this sender is subject to the Freedom of Information Act (FOIA) and may be disclosed to third parties.

From: [Dell, David](#)
To: [FW4 CRC HCP](#)
Subject: Fwd: Coral Reef Commons Draft Habitat Conservation Plan Agency/Docket Number: FWS-R4-ES-2016-N223
Document Number: 2017-05767
Date: Monday, May 15, 2017 7:27:40 AM

David Dell
Southeast Region
HCP and Safe Harbors Coordinator
404/[REDACTED]
fax: 7081
david_dell@fws.gov

NOTE: All email correspondence and attachments received from or sent to me are subject to the Freedom of Information Act (FOIA) and may be disclosed to third parties.

----- Forwarded message -----

From: **Roberta Neway** <robertajn@att.net>
Date: Sun, May 14, 2017 at 10:32 AM
Subject: Coral Reef Commons Draft Habitat Conservation Plan Agency/Docket Number: FWS-R4-ES-2016-N223 Document Number: 2017-05767
To: "David_dell@fws.gov" <David_dell@fws.gov>, "Ashleigh_Blackford@fws.gov" <Ashleigh_Blackford@fws.gov>

Dear Mr. Dell and Ms. Blackford,

Please do not allow commercial development to take over the subject pine rockland.

This ecosystem is irreplaceable.

Thank you in advance for protecting this small piece of Florida.

Sincerely,
Roberta Neway

[REDACTED]

From: [Dell, David](#)
To: [FW4 CRC_HCP](#)
Subject: Fwd: Coral Reef Commons Draft Habitat Conservation Plan
Date: Wednesday, May 10, 2017 7:21:03 AM

David Dell
Southeast Region
HCP and Safe Harbors Coordinator
404/[REDACTED]
fax: 7081
david_dell@fws.gov

NOTE: All email correspondence and attachments received from or sent to me are subject to the Freedom of Information Act (FOIA) and may be disclosed to third parties.

----- Forwarded message -----
From: EarthSave Florida <infoearthsavemiami@gmail.com>
Date: Tue, May 9, 2017 at 10:44 PM
Subject: Re: Coral Reef Commons Draft Habitat Conservation Plan
To: david_dell@fws.gov, ashleigh_blackford@fws.gov

Re: Coral Reef Commons Draft Habitat Conservation Plan

Agency/Docket Number: FWS-R4- ES-2016- N223

Document Number: 2017-05767

Dear Mr. David Dell, Regional HCP Coordinator, Atlanta

and Ashleigh Blackford, Supervisory Wildlife Biologist, South Florida Ecological Services

Please give full and serious consideration to the numerous disadvantages of damaging the Pine Rockland

and the numerous benefits of preserving it,

Peas In – Peace Out

Jeff 'VeganMan' Tucker

a/k/a Prof. Veghead | Chef Jef | Wiser Adviser

Chairperson, FL Chapter of 501C3 EarthSave Int'l

Text/Vmail/Tel [REDACTED] | JMTUCKER@EARTHSAVEMIAMI.ORG | www.earthsavemiami.org

[REDACTED]

YouTube Channel> [tinyurl.com/EarthSaveFlorida-YouTube](https://www.youtube.com/channel/UC...)

MediaKit Downloads> <https://tinyurl.com/EarthSaveMediaKit>

Upload/SharePhotos/Videos> tinyurl.com/Share-Images-to-EarthSave

Donate to 501C3 EarthSave> <https://secure.meetup.com/Earthsave-South-Florida/contribute/>

FL. REGISTERED SOLICITOR # CH47114

Advocating Healthy-Humane-(Holy)Holistic Vegan Lifestyle for People, Animals and (Sacred) Environment

End Global Warming, Dimming and Depletion- One Bite at a Time

'South Florida's Original Public Vegan Dinners & Portal'

Vegetarians eat veggies, Fruitarians... fruit, So what do Humanitarians eat?

Florida Reg. Solicitor: Save The Earth EcoCenter, Inc. #CH47114

From: [Blackford, Ashleigh](#)
To: [FW4 CRC HCP](#)
Subject: Fwd: Coral Reef Commons Draft Habitat Conservation Plan Agency/Docket Number: FWS-R4-ES-2016-N223
Document Number: 2017-05767
Date: Monday, May 15, 2017 8:50:06 AM

----- Forwarded message -----

From: **Roberta Neway** <robertajn@att.net>
Date: Sun, May 14, 2017 at 10:32 AM
Subject: Coral Reef Commons Draft Habitat Conservation Plan Agency/Docket Number: FWS-R4-ES-2016-N223 Document Number: 2017-05767
To: "David_dell@fws.gov" <David_dell@fws.gov>, "Ashleigh_Blackford@fws.gov" <Ashleigh_Blackford@fws.gov>

Dear Mr. Dell and Ms. Blackford,

Please do not allow commercial development to take over the subject pine rockland.

This ecosystem is irreplaceable.

Thank you in advance for protecting this small piece of Florida.

Sincerely,
Roberta Neway



--

Ashleigh Blackford
U.S. Fish and Wildlife Service
Supervisory Wildlife Biologist
Planning & Resource Conservation - East
South Florida Ecological Services Office
1339 20th Street - Vero Beach, FL 32960
phone: 

ashleigh_blackford@fws.gov

NOTE: This email correspondence and any attachments to and from this sender is subject to the Freedom of

Information Act (FOIA) and may be disclosed to third parties.

From: [Gigi Paldi](#)
To: crc_hcp@fws.gov
Cc: [Esther Monzon-Aguirre](#)
Subject: Fwd: Coral Reef Commons
Date: Thursday, May 11, 2017 5:46:01 PM
Attachments: [image003.png](#)

Mr. David Dell
U.S. Fish and Wildlife Service
Southeast Region, Ecological Services
1875 Century Boulevard
Atlanta GA 3034

The development and management of the Coral Reef Preserve under the proposed HCP is the best hope for preservation of this habitat.

I am writing in support of the Habitat Conservation Plan (HCP) by Coral Reef Commons. The opportunity for jobs and a common sense housing development is crucial for this area.

This plan will provide the necessary management to conserve the endangered species present from now and far into the future.

I hope you will approve the plan.

Thank you,

Ms. Gigi Paldi

From: [Dell, David](#)
To: [FW4 CRC_HCP](#)
Subject: Fwd: Florida Rockland
Date: Monday, May 08, 2017 2:24:30 PM

David Dell
Southeast Region
HCP and Safe Harbors Coordinator
404/ [REDACTED]
fax: 7081
david_dell@fws.gov

NOTE: All email correspondence and attachments received from or sent to me are subject to the Freedom of Information Act (FOIA) and may be disclosed to third parties.

----- Forwarded message -----
From: **Jessica Feltrin** <jessicaofeltrin@gmail.com>
Date: Mon, May 8, 2017 at 2:20 PM
Subject: Florida Rockland
To: david_dell@fws.gov

Esteemed Mr. David Dell,

It has come to my attention that the Florida Pine Rockland habitat is under extreme endangerment. These Pine Rocklands are native to Florida, but due to urbanization and industrialization, the coverage of this habitat has reduced to 2% of its former glory. This open canopy of south Floridian slash pine and its patchy understory of tropical and temperate shrubs and palms is crucial to the survival of many species such as the Zebra long-wing butterfly and the Florida Panther. Walmart, among other industries, seek to buy the rights to this land in order to build in the area. This would destroy the habitat completely and be extremely environmentally damaging. My request is to prevent this from happening. In order to do this, I ask that the permits to complete this task be denied. This would be a significant conservation of Florida's native flora and fauna, which has been almost completely decimated. This topic is special to me since I used to run cross country races in these Rocklands and would hate to see them wiped out. Thank you for your attention; I appreciate the time and effort you and your colleagues put into reading and taking emails like mine into consideration. I look forward to your reply.

Best regards,

Jessica Feltrin

From: [Dell, David](#)
To: [FW4 CRC HCP](#)
Subject: Fwd: Pine Docklands Development Proposal
Date: Monday, May 15, 2017 7:18:40 AM

David Dell
Southeast Region
HCP and Safe Harbors Coordinator
404/ [REDACTED]
fax: 7081
david_dell@fws.gov

NOTE: All email correspondence and attachments received from or sent to me are subject to the Freedom of Information Act (FOIA) and may be disclosed to third parties.

----- Forwarded message -----
From: **Tom H Southern** <tomhsouthern@gmail.com>
Date: Sat, May 13, 2017 at 2:15 PM
Subject: Pine Docklands Development Proposal
To: Ashleigh_Blackford@fws.gov, David_dell@fws.gov

Good Morning:

Please add me to those who oppose this development in its entirety. There is SO little natural land left in Miami and traffic is SO bad. And as Roger Hammer has stated and proved because he's done it as the head naturalist for Miami Dade County, the portion of this land that has been 'degraded', can, with a little effort and fire, be restored, no if, ands, or butts, about it.

Thank you, and please, base your decision on science. Please do not bow to political pressure from those who would, as Jackson Browne put it in a song, "forge her beauty into power."

Tom Southern
[REDACTED]

From: [Blackford, Ashleigh](#)
To: [FW4 CRC_HCP](#)
Subject: Fwd: Pine Docklands Development Proposal
Date: Monday, May 15, 2017 8:49:16 AM

----- Forwarded message -----

From: **Tom H Southern** <tomhsouthern@gmail.com>
Date: Sat, May 13, 2017 at 2:15 PM
Subject: Pine Docklands Development Proposal
To: [Ashleigh Blackford@fws.gov](mailto:Ashleigh.Blackford@fws.gov), David_dell@fws.gov

Good Morning:

Please add me to those who oppose this development in its entirety. There is SO little natural land left in Miami and traffic is SO bad. And as Roger Hammer has stated and proved because he's done it as the head naturalist for Miami Dade County, the portion of this land that has been 'degraded', can, with a little effort and fire, be restored, no if, ands, or buts, about it.

Thank you, and please, base your decision on science. Please do not bow to political pressure from those who would, as Jackson Browne put it in a song, "forge her beauty into power."

Tom Southern



--

Ashleigh Blackford
U.S. Fish and Wildlife Service
Supervisory Wildlife Biologist
Planning & Resource Conservation - East
South Florida Ecological Services Office
1339 20th Street - Vero Beach, FL 32960
phone: 
ashleigh_blackford@fws.gov

NOTE: This email correspondence and any attachments to and from this sender is subject to the Freedom of

Information Act (FOIA) and may be disclosed to third parties.

From: [Dell, David](#)
To: [FW4 CRC HCP](#)
Subject: Fwd: Pine Rocklands Conservation
Date: Wednesday, May 10, 2017 10:15:35 AM

David Dell
Southeast Region
HCP and Safe Harbors Coordinator
404/ [REDACTED]
fax: 7081
david_dell@fws.gov

NOTE: All email correspondence and attachments received from or sent to me are subject to the Freedom of Information Act (FOIA) and may be disclosed to third parties.

----- Forwarded message -----
From: **Katherine Abad** <katherina0501@gmail.com>
Date: Wed, May 10, 2017 at 10:11 AM
Subject: Pine Rocklands Conservation
To: david_dell@fws.gov, ashleigh_blackford@fws.gov

To whom it may concern,

I am writing to you about the Pine Rocklands and my concern regarding their future in South Florida. About 20% of plant species found in these rocklands, cannot be found anywhere else in the world. I am sending this email as a concerned citizen of Dade County, who has been enjoying the amenities the Everglades has to offer since I could remember, like biking at Shark Valley and walking tours around endless acres of mangroves. What will another Walmart do for us? We should better preserve our already diminishing environments and the intricate ecosystems that reside in them. Urban Sprawl has already caused the downfall of million of acres of exotic wildlife all around the world and it is time for that to end. Thank you for your time, and I hope the pending plans of development are not granted, because just like me, millions of citizens not only from Florida, but from all over the world enjoy the Everglades, and nobody would enjoy a giant super center with a Walmart and food amenities.

Katherine Abad.

From: [Dell, David](#)
To: [FW4 CRC HCP](#)
Subject: Fwd: Richmond Pine Rockland Habitat in Dade County
Date: Wednesday, May 10, 2017 7:20:17 AM

David Dell
Southeast Region
HCP and Safe Harbors Coordinator
404/ [REDACTED]
fax: 7081
david_dell@fws.gov

NOTE: All email correspondence and attachments received from or sent to me are subject to the Freedom of Information Act (FOIA) and may be disclosed to third parties.

----- Forwarded message -----

From: hrg4@aol.com <hrg4@aol.com>
Date: Tue, May 9, 2017 at 4:54 PM
Subject: Richmond Pine Rockland Habitat in Dade County
To: david_dell@fws.gov

Hello Mr. David Dell, Let me be brief since this and e-mail. I oppose the development of the Pine Docklands on 152 Street. There are many reasons but let me mention a few. There are less than 2% of these natural habitats left in Dade County which originally extended throughout South Florida. We must protect these areas for our offspring. Many species of insects, plants, and animals are endangered and can only be found in the Rocklands. Finally, 152 Street has congested traffic already. Adding a Walmart and further development will only compound the problem of traffic in the area. Please consider my comments in your decision. Thank you,
Hugh Gilmore IV [REDACTED].

From: [Dell, David](#)
To: [FW4 CRC_HCP](#)
Subject: Fwd: Save the Pine Rocklands
Date: Monday, May 08, 2017 2:41:48 PM

David Dell
Southeast Region
HCP and Safe Harbors Coordinator
404/ [REDACTED]
fax: 7081
david_dell@fws.gov

NOTE: All email correspondence and attachments received from or sent to me are subject to the Freedom of Information Act (FOIA) and may be disclosed to third parties.

----- Forwarded message -----

From: **Micaela Giberti** <micaelagiberti@gmail.com>
Date: Mon, May 8, 2017 at 2:24 PM
Subject: Save the Pine Rocklands
To: david_dell@fws.gov

Dear David Dell,

I am writing today to express my concern over the destruction of the Pine Rocklands. This destruction would eliminate various valuable species that cannot be found anywhere else, create large-scale traffic jams ultimately increasing air pollution, and remove yet another area of wildlife for the spread of chain stores. Despite the economic growth this plan promotes, the loss of an extremely rare wilderness area is more important.

While I understand the prospect of gaining economic wealth in the establishment of a Walmart, apartment complexes, and a waterpark is important to the growth of the economy, these establishments will bring many problems. For one, many rare endangered species such as the Eastern Indigo Snake and Gopher Tortoise, and the Florida Bonneted bat will be lost forever. Another issue would be the increase of traffic brought on by this large establishment, this area of Florida already experiences severe traffic jams. Last, the increase of air pollution generated by these establishments as well as the increase of traffic will have a great impact on the environment.

If this project and the permits needed to complete it are approved, it will prove to be a serious catastrophe. Your past involvement in other projects shows that you are willing to consider the environmental side of this project and how the loss of the Pine Rocklands will negatively affect the environment of Southern Florida.

The safety of the Pine Rocklands is important to me because of the continuous loss of important wildlife habitats in Florida. If this issue continues to occur, future generations of Floridians will not have the pleasure of having to these areas.

Please keep me informed of your involvement in this legislation and any additional comments you may have.

Sincerely,
Micaela Giberti

From: [Sarah Peake](#)
To: crc_hcp@fws.gov
Cc: emonzonaguirre@evservicesinc.com
Subject: Habitat Conservation Plan
Date: Wednesday, May 10, 2017 9:36:57 AM

I am writing in support of the Habitat Conservation Plan (HCP) by Coral Reef Commons. My family and I are very familiar with the area as frequent visitors to the neighboring zoo. The development and management of the Coral Reef Preserve under the proposed HCP will provide the necessary management to conserve the endangered species. Please approve the plan.

Thanks!
Sarah Peake

From: [Ricardo Melendez](#)
To: crc_hcp@fws.gov
Cc: [Esther Monzon-Aguirre](#)
Subject: HCP-Coral Reef
Date: Wednesday, May 10, 2017 9:16:45 AM

To whom it may concern:

I am writing in support of the Habitat Conservation Plan (HCP) by Coral Reef Commons. My family and I are very familiar with the area as frequent visitors to the neighboring zoo. The development and management of the Coral Reef Preserve under the proposed HCP will provide the necessary management to conserve the endangered species. Please approve the plan.

Sincerely,

Ricardo Melendez

From: [M. Belen Valladares](#)
To: [David_dell@fws.gov](#); [Ashleigh_Blackford@fws.gov](#); [crc_hcp@fws.gov](#)
Subject: Letter to Fish and Wildlife opposing Kill Permits in the Richmond site
Date: Friday, May 12, 2017 8:19:39 PM
Attachments: [Letter to Fish and Wildlife opposign Kill Permits.docx](#)
Importance: High

Good evening,

Please see attached letter opposing kill permits in the Richmond site. Here is a link to the book mentioned in the letter. <https://www.miamipinerocklandscoalition.org/pine-rockland-critters.html>

Sincerely,



M. Belen Valladares

Board Member

Miami Pine Rocklands Coalition

Cell: (305) [REDACTED]

Email: BV@DynamicPA.com

www.MiamiPineRocklandsCoalition.org

From: Sanna O'Sullivan
To: crc_hcp@fws.gov
Subject: Listen to the people
Date: Friday, May 12, 2017 7:08:54 PM

Good evening,

The ecosystem of Pine Rocklands that Miami was built on are so important to preserving key endangered species and habitat of our one of a kind environment that us as a community and city need to come together to protect it. Enough is enough for developing over critically endangered ecosystems - it's absolutely shameful. Especially for our future generations.

As protection agency like yourselves, please see why paving it and building on top of a globally endangered habitat is so awfully wrong today. Stand up to it! Considerig the following points -

The endangered animals known or suspected to be on the site (the two butterflies, the beetle and the two snakes) were not properly surveyed for.

Their proposed mitigation is inadequate. Mitigation lands should be in ratio of at least 5:1 (protected areas : developed areas). The proposed mitigation ratio is at best 1.23 acres of preserved land for every acre of development. This is not within the "range of reason" esp. when compared to other HCPs, especially for a project contemplates the loss of a material portion of a globally-imperiled ecosystem, which is designated "Critical Habitat" for several species.

Burning is crucial but impossible. The proposed mitigation on what little land is being "preserved" and managed is a pine land and depends entirely on a robust and periodic fire regime, which is not feasible, especially with @2000 people (900 apts.), a Walmart , and a public school, all in immediate proximity to the areas which must be burned. As noted in the HCP, mechanical and/or chemical maintenance of pinelands is not an adequate substitute for fire.

The developer has no material, legally-enforceable obligation(s) (and no funds on deposit or bond) to restore and maintain the natural areas, as outlined in the HCP. There are only promises, no financially-backed guaranties.

"Success" is illusory. The developer's definition of "success" in mitigation is self-defined and not scientifically based: Their Habitat Value Units (HVUs) are "funny money."

No penalty for failure. The developer's "success criteria" for restoration and maintenance of the preserves have no realistic penalty for failure. **The developer gets to destroy a globally-imperiled resource and "take" the endangered species, without any material financial risk or penalty, even if they fail to achieve their weak definition of "success."**

Sincerely,
Sanna O'Sullivan

From: [Shelley Whittington](#)
To: crc_hcp@fws.gov
Subject: pine forest
Date: Monday, May 08, 2017 8:43:01 AM

Please save this last remaining tract of land, Florida's pine rockland forest, for the native plants and animals that live here and have lived here for millions of years before us! Habitat is being destroyed at an alarming rate and we have the power to save the last stretched of wild. Please stop this Walmart from destroying this globally endangered ecosystem land. I will never be able to return to Florida again if this is how you treat our earth.

Sadly
Shelley Whittington



From: [Leo Jacobs](#)
To: crc_hcp@fws.gov
Subject: Pine Rocklands
Date: Monday, May 08, 2017 1:29:04 PM

According to Miami Herald 4/9/17 "UM trying to clear path for walmart in rare forest" , The entomologist, Barry Kinisley, never conducted a survey for the Tiger Beetle. He said, " the environment looked degraded".

The developer said there were none found. Two different statements. The developer gives no potential environmental value to the land.

The article states there were 25 Bat calls recorded. The developer said there were no bats living in the forest. Logically they must have been foraging for food as they eat insects on the wing.

They are social animals and call to each other when a food source is found. If they find food over the forest, that is what's called living. Take away my food source, I can't live.

When the UM, developer Peter Cummings, and the Federal Wildlife staff team up to build a model to calculate how to mitigate the last Pine Rockland in private hands, they must do a more

responsible job. Even if all three participants agree that they did a fantastic job, or the best they could do, It's not good enough.

Not good enough because at the outset it assumes that a Walmart and 900 apartments is the best use of the land. That's what Mr. Cimmings wants and what the UM wants. It seems the Federal

Fish and Wildlife staff want that too. It doesn't seem the Feds are looking out for the endangered species, both plants and animals that presently exist on the property.

Bring in a restoration expert like Mr. Roger Hammer as a consultant on your plan to mitigate for some credibility.

Thank You,
Lee Jacobs



From: [Daniel Kinka](#)
To: crc_hcp@fws.gov
Subject: Please DO NOT Imperil Pine Rockland Habitat
Date: Saturday, May 13, 2017 4:32:25 PM

To whom it may concern,

Pine rockland was once one of the dominant habitats in South Florida. It is home to the highest native plant biodiversity of any Florida ecosystem and is one of the rarest types of forest in the entire world. Nevertheless, today less than 2 percent of pine rockland habitat remains in Miami-Dade County. Of the dwindling remnants of pine rockland in South Florida, the largest habitat patch outside a National Park is the South Dade Richmond Pine Complex, which is scheduled to be bulldozed, or at the least, further fragmented to construct yet another residential and commercial complex.

In addition to threatening one of the few remnants of a globally imperiled habitat, the Coral Reef Commons Draft Habitat Conservation Plan imperils numerous at-risk species, including Bartram's scrub-hairstreak butterfly, Florida leafwing butterfly, Florida bonneted bat, eastern indigo snake, rim rock crowned snake, gopher tortoise, Miami tiger beetle, white-crowned pigeon, Florida Brickell bush, and Carter's small flowered flax.

Every vanishing patch of pine rockland, and each species that it supports, warrant protection. They are a rare and a unique part of the country's natural history, and should be protected in perpetuity. Strip malls are an ephemeral and ubiquitous feature of the American landscape which deserve none of the same considerations.

Please do not approve any habitat conservation plan that threatens to replace a single square-yard of precious pine rockland habitat. And thank you for your consideration.

Sincerely,

--

Daniel Kinka

Ph.D. Candidate in Ecology /
Utah Public Radio Science Reporter
Wildland Resources Department
Utah State University

From: [Patti Reynolds](#)
To: crc_hcp@fws.gov
Subject: Preserve the land!
Date: Tuesday, May 09, 2017 3:39:21 PM

To whom it may concern,

This is simple...we have to protect precious land which inhabits endangered species of animals and plants! We have enough Walmarts! If we don't stop destroying rare forests, our entire ecosystem is in danger. This is a no brainer! PLEASE DON'T DO THIS!!!

Sincerely,
Patti Reynolds

Sent from my iPad

From: [Julie Young](#)
To: crc_hcp@fws.gov
Subject: Protect Pine Rockland
Date: Sunday, May 14, 2017 12:24:50 AM

Please do not approve any habitat conservation plan that threatens to replace a single square-yard of precious pine rockland habitat.

Pine rockland was once one of the dominant habitats in South Florida. It is home to the highest native plant biodiversity of any Florida ecosystem and is one of the rarest types of forest in the entire world. Nevertheless, today less than 2 percent of pine rockland habitat remains in Miami-Dade County. Of the dwindling remnants of pine rockland in South Florida, the largest habitat patch outside a National Park is the South Dade Richmond Pine Complex, which is scheduled to be bulldozed, or at the least, further fragmented to construct yet another residential and commercial complex.

In addition to threatening one of the few remnants of a globally imperiled habitat, the Coral Reef Commons Draft Habitat Conservation Plan imperils numerous at-risk species, including Bartram's scrub-hairstreak butterfly, Florida leafwing butterfly, Florida bonneted bat, eastern indigo snake, rim rock crowned snake, gopher tortoise, Miami tiger beetle, white-crowned pigeon, Florida Brickell bush, and Carter's small flowered flax.

Every vanishing patch of pine rockland, and each species that it supports, warrant protection. They are a rare and a unique part of the country's natural history, and should be protected in perpetuity. Strip malls are an ephemeral and ubiquitous feature of the American landscape which deserve none of the same considerations.

Sincerely,

Julie Young

From: [Jason Nall](#)
To: David_dell@fws.gov; Ashleigh_Blackford@fws.gov; crc_hcp@fws.gov
Subject: Protect The Pine Rockland Near The Miami Zoo, Over Any Current & Future Construction Plans!
Date: Monday, May 08, 2017 3:09:12 PM

Dear Mr. Dell and Ms. Blackford,

As a concerned Florida Resident I respectfully request a public hearing on the above-referenced proposed incidental take permit and environmental assessment on the commercial mixed-use development locally known as Coral Reef Commons.

We request that this public hearing take place during the comment period and in a location and timeframe that ensures members of the public will be able to meaningfully participate.

As you are aware, native habitats in Florida are rapidly disappearing.

Perennially rare communities, such as the pine rocklands that would be impacted by Coral Reef Commons, are among the native habitats in Florida that have been drastically reduced in area.

Pine rockland is a globally endangered plant community with more than 98 percent decline in its pre-settlement area due to significant ecological degradation, conversion to other land uses, and outright destruction.

This important community provides vital habitat for many endangered species, including those at issue in this permit application.

The U.S. Fish and Wildlife Service's (Service) review of the Coral Reef Commons application requires compliance with the Endangered Species Act, National Environmental Policy Act (NEPA), and Administrative Procedure Act.

The Service's Habitat Conservation Planning and Incidental Take Permit Processing Handbook (2016) (hereinafter, Handbook), a policy document intended to inform how the Service processes Endangered Species Act Section 10 incidental take permits, describes public hearings as: [a] common method for soliciting stakeholder input on

agency actions. Hearings provide all or selected participants an opportunity to present their opinions on an issue, usually in a formal manner in an allotted amount of time The information is recorded and becomes part of the public record. Laws and agency regulations often mandate public hearings.

Likewise, the Handbook describes public meetings as:

[f]orums in which our staff can present information to interested stakeholders.

Many public meetings . . . are designed to encourage discussion and feedback. Public meetings can be very effective and useful for conveying information, educating the interested public, and identifying interested parties.

This guidance echoes the requirements of NEPA, which at every turn emphasize the importance of public participation.

The Council on Environmental Quality’s (CEQ) regulations implementing NEPA state that “[a]ccurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA.” 40 C.F.R. § 1500.1.

Indeed, CEQ regulations require that the Service hold a public hearing or meeting “whenever appropriate,” taking into account factors such as “substantial environmental controversy concerning the proposed action or substantial interest in holding the hearing.” 40 C.F.R. § 1506.6(c)(1).

I have a long standing interest in the protection of Pine Rocklands and their endangered and threatened species.

I have also have carefully followed years of additional requests for more Pine Rockland Protection.

For example, in 2014, the Center for Biological Diversity, South Florida Wildlands Association, Tropical Audubon Society, Miami Blue Chapter of the North American Butterfly Association and Miami Pine Rocklands Coalition petitioned the Service to list the Miami tiger beetle, one of the species impacted by the incidental take permit, as endangered.

Additionally, as the result of a settlement agreement reached between the Center for

Biological Diversity and the Service in 2011, the Service listed the Florida bonneted bat as endangered in 2013 ; listed as endangered and designated critical habitat for the Bartram's scrub-hairstreak butterfly and Florida leafwing butterfly in 2014 ; and listed as endangered and designated critical habitat for the Carter's small-flowered flax and Florida brickell-bush in 2015. All are species that would be negatively impact by Coral Reef Commons.

I understand there have been more than 14,000 letters to the developer of Coral Reef Commons asking it to protect listed species and not move forward with the project.

Many concerned residents appear to oppose the project and would benefit from the opportunity to attend a public hearing on the application.

It is evident that a substantial environmental controversy concerning the proposed action and a substantial interest in holding the hearing exist.

In addition, I'd also like to request the Public Comment Period be extended to 90 days to allow the Public to carefully examine the proposed Coral Reef Commons HCP in light of the more than 3 years the applicants have had to develop it jointly with the FWS. I look forward to your reply.

--

Sincerely Thank you, for your time & patience in reading my E-mail,

Jason Nall

I am a:

Professional animals, humans and homes sitter,

Elections day worker- applying to Kitsap County Elections Department,

Trying to become an inventor/entrepreneur*,

Trying to find a Co-Op organic and sustainable Fruit and Vegetables Farm, Market & hopefully, feeding the hungry and educating the children,

And ride my bicycle everywhere.

***Like Politics &/or card & board games**

I am creating The Civic Game:

See if you and your fellow players can create and maintain the most successful political party or country, within The Civic Game,

Expansion cards for adding more than one-country and ambassadors,

If you cannot create and maintain the most successful political party or country, within The Civic Game, then you and your fellow players can create their own version of The Civic Game.

Great tool for understanding politics and finding a love for politics and its importance to be involved in,

***Like PC &/or video gaming football?**

I am creating The G.reat W.hite's F.ootB.all A.ssociation:

Yearlong football schedule, using brand new FootBall game & demo, will be on The Internet, ?Kingston, WA's OR Miami, FL's MPCs?,

Own franchises, programs, teams, Watch their games & events, customize their players/owners/fans/employees, mentor younger owners, GW'sFBA's merchandise,

?Like Playing Football outside?, ?The GW'sFBA outside the PC? In the far future The GW'sFBA might be creating a real world football association.

From: [Luria Lee](#)
To: crc_hcp@fws.gov
Subject: Public Comment on the draft Coral Reef Commons HCP and EA
Date: Saturday, May 13, 2017 7:24:13 PM

As a resident of Broward County who regularly enjoys exploring the unique natural wonders of South Florida, and as a future conservationist, I urge the developers of Coral Reef Commons to halt construction on this unique site, and find another site to develop a mixed use residential/commercial project that is not an endangered habitat, preferably an already developed site for urban renewal.

The site proposed to be developed is one of the rarest habitats in the world, the pine rock land. 2% of it remains today, and although the development is 137 acres, for such a small habitat containing demanding biota it is not a good idea in the long run survival.

In addition, since South Miami is one of the most poverty segregated cities in the nation, building such a project in an area already congested with commercial developments, this would not do much to help communities that need it the most. What use is another residential structure that people cannot access?

Again, I urge the USFWS to not give the go ahead to start building the project. This is a short-term economic benefit for few people, for the detriment of most and more importantly, the unique treasure we have in this environment.

Sincerely,

from Luria Lee

From: [Cully Waggoner](#)
To: [M. Belen Valladares](#)
Cc: [David_dell@fws.gov](#); [Ashleigh Blackford FWS](#); [crc_hcp@fws.gov](#)
Subject: Re: Letter to Fish and Wildlife opposing Kill Permits in the Richmond site
Date: Saturday, May 13, 2017 9:59:33 PM

Good letter, we need as many good letters as we can get.

Cully

On Fri, May 12, 2017 at 8:17 PM, M. Belen Valladares <BV@dynamicpa.com> wrote:

Good evening,

Please see attached letter opposing kill permits in the Richmond site. Here is a link to the book mentioned in the letter. <https://www.miamipinerocklandscoalition.org/pine-rockland-critters.html>

Sincerely,



M. Belen Valladares

Board Member

Miami Pine Rocklands Coalition

Cell: (305) [REDACTED]

Email: BV@DynamicPA.com

www.MiamiPineRocklandsCoalition.org

--

Cully Waggoner
Vice President, Miami Pine Rocklands Coalition

Personal:

Cell: [REDACTED]

Home: [REDACTED]

E-Mail: cullywaggoner@gmail.com;

MSN IM: cullywaggoner@hotmail.com;

Facebook: <http://www.facebook.com/cully.waggoner>

Twitter: <http://twitter.com/CullyWaggoner>

LinkedIn: <http://www.linkedin.com/in/cullywaggoner>

Instagram: <http://instagram.com/cullywaggoner>

Skype: cully.waggoner

From: bv@dynamicpa.com
To: [Cully Waggoner](mailto:Cully_Waggoner)
Cc: david_dell@fws.gov; [Ashleigh Blackford FWS](mailto:Ashleigh.Blackford@FWS); crc_hcp@fws.gov
Subject: Re: Letter to Fish and Wildlife opposing Kill Permits in the Richmond site
Date: Sunday, May 14, 2017 6:43:03 PM

Thank you Cully.

M. Belén Valladares
Excuse typos and brevity, sent from cell phone [REDACTED]

On Sat, May 13, 2017 at 9:59 PM -0400, "Cully Waggoner" <cullywaggoner@gmail.com> wrote:

Good letter, we need as many good letters as we can get.

Cully

On Fri, May 12, 2017 at 8:17 PM, M. Belen Valladares <BV@dynamicpa.com> wrote:

Good evening,

Please see attached letter opposing kill permits in the Richmond site. Here is a link to the book mentioned in the letter. <https://www.miamipinerocklandscoalition.org/pine-rockland-critters.html>

Sincerely,



M. Belen Valladares

Board Member

Miami Pine Rocklands Coalition

Cell: [\(305\) \[REDACTED\]](tel:(305) [REDACTED])

Email: BV@DynamicPA.com

www.MiamiPineRocklandsCoalition.org

--

Cully Waggoner

Vice President, Miami Pine Rocklands Coalition

Personal:

Cell: [REDACTED]

Home: [REDACTED]

E-Mail: cullywaggoner@gmail.com;

MSN IM: cullywaggoner@hotmail.com;

Facebook: <http://www.facebook.com/cully.waggoner>

Twitter: <http://twitter.com/CullyWaggoner>

LinkedIn: <http://www.linkedin.com/in/cullywaggoner>

Instagram: <http://instagram.com/cullywaggoner>

Skype: cully.waggoner

From: [RayH](#)
To: crc_hcp@fws.gov
Cc: David_dell@fws.gov; Ashleigh_Blackford@fws.gov
Subject: Richmond Pine Rocklands
Date: Friday, May 12, 2017 5:51:44 PM

Please...do the right thing.

1. The developer's "science" is flawed and incomplete. Most of the endangered animals known or suspected to be on the site (the two butterflies, the beetle and the two snakes) were not properly surveyed for.
2. Their proposed mitigation is inadequate. Mitigation lands should be in ratio of at least 5:1 (protected areas : developed areas). The proposed mitigation ratio is at best 1.23 acres of preserved land for every acre of development. This is not within the "range of reason" esp. when compared to other HCPs, especially for a project contemplates the loss of a material portion of a globally-imperiled ecosystem, which is designated "Critical Habitat" for several species.
3. Burning is crucial but impossible. The proposed mitigation on what little land is being "preserved" and managed is a pine land and depends entirely on a robust and periodic fire regime, which is not feasible, especially with @2000 people (900 apts.), a Walmart, and a public school, all in immediate proximity to the areas which must be burned. As noted in the HCP, mechanical and/or chemical maintenance of pinelands is not an adequate substitute for fire.
4. "Show me the money." The developer has no material, legally-enforceable obligation(s) (and no funds on deposit or bond) to restore and maintain the natural areas, as outlined in the HCP. There are only promises, no financially-backed guaranties.
5. "Success" is illusory. The developer's definition of "success" in mitigation is self-defined and not scientifically based: Their Habitat Value Units (HVUs) are "funny money."

WE trust you with the future of Florida.

Ray Henderson


PS Our Ahole commissioner has his own agenda so we know why he's pushing this.

From: [Alice Chan](#)
To: crc_hcp@fws.gov
Subject: Rockland Tract
Date: Monday, May 08, 2017 1:56:27 PM

Good Morning

I am writing in regards to the proposed development of the Rockland tract near Miami Zoo. This piece of land represents some of the last 1.5 percent of this unique habitat outside of Everglades National Park home to endangered plants and animals. We do not need a Wal-Mart or additional apartments!

Please see this decisions as a duty to preserve and pass on to future generations.

A gift to our children that they too can enjoy the beauty of OUR South Florida. Let's not allow South Florida become as wall to wall strip malls and apartments.

Sincerely

Alice Chan

From: [Cory Driscoll](#)
To: crc_hcp@fws.gov
Subject: Save Pine Rockland
Date: Sunday, May 14, 2017 7:35:13 AM

To whom it may concern,

Pine rockland was once one of the dominant habitats in South Florida. It is home to the highest native plant biodiversity of any Florida ecosystem and is one of the rarest types of forest in the entire world. Nevertheless, today less than 2 percent of pine rockland habitat remains in Miami-Dade County. Of the dwindling remnants of pine rockland in South Florida, the largest habitat patch outside a National Park is the South Dade Richmond Pine Complex, which is scheduled to be bulldozed, or at the least, further fragmented to construct yet another residential and commercial complex.

In addition to threatening one of the few remnants of a globally imperiled habitat, the Coral Reef Commons Draft Habitat Conservation Plan imperils numerous at-risk species, including Bartram's scrub-hairstreak butterfly, Florida leafwing butterfly, Florida bonneted bat, eastern indigo snake, rim rock crowned snake, gopher tortoise, Miami tiger beetle, white-crowned pigeon, Florida Brickell bush, and Carter's small flowered flax.

Every vanishing patch of pine rockland, and each species that it supports, warrant protection. They are a rare and a unique part of the country's natural history, and should be protected in perpetuity. Strip malls are an ephemeral and ubiquitous feature of the American landscape which deserve none of the same considerations.

Please do not approve any habitat conservation plan that threatens to replace a single square-yard of precious pine rockland habitat.

Sincerely,

Cory Driscoll

Sent from my iPhone

From: [Sarah Ridgway](#)
To: crc_hcp@fws.gov
Subject: saving the pine rockland
Date: Tuesday, May 09, 2017 3:44:33 PM

Dear representative,

I am writing in support of saving the parcel of pine rockland that is located just north of Larry and Penny Johnson Park and slated for the development of a Walmart. It is imperative that we preserve these remaining parcels of South Florida's heritage for future generations and to perpetuate the habitat for many rare species that are not found anywhere else in the world. Please protect these lands from future development!

Regards,
Sarah Ridgway

From: [Dell, David](#)
To: [FW4 CRC_HCP](#)
Subject: Scans made May 9
Date: Tuesday, May 09, 2017 2:37:49 PM
Attachments: [letter bdaniels.pdf](#)
[letter kleas.pdf](#)
[stack of 6 form letters may9.pdf](#)
[letter djacobs.pdf](#)

David Dell
Southeast Region
HCP and Safe Harbors Coordinator
404/ [REDACTED]
fax: 7081
david_dell@fws.gov

NOTE: All email correspondence and attachments received from or sent to me are subject to the Freedom of Information Act (FOIA) and may be disclosed to third parties.

From: [Robert Spencer](#)
To: crc_hcp@fws.gov
Subject: TO MANY WALL-MARTS
Date: Tuesday, May 09, 2017 6:06:52 PM

Sir,

I write to you to voice my opinion and to try to stop an atrocity. I read that a RARE pine forest near Miami is in danger from a Wal-Mart. This cannot be tolerated. Just another Wal-Mart? No. There are many of them. Do not allow us and our future generations no longer have this rare gem of a forest, in exchange for another big box hub of capitalism, low wage jobs and sub standard products. Need I go on? With a administration ready to steal all our natural area, each one, every one, is now a point of contention. Be smart, and look past the horrible installation of this horrible corporation and preserve this gem of nature.

Thank you,

Bob Spencer