

**From:** [REDACTED]  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Addressed to David Dell and Ashleigh Blackford  
**Date:** Sunday, April 02, 2017 12:30:12 PM

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Hello,

I am writing this email concerning the pine rockland property owned by Ram Realty. I am opposed to their most recent plan to develop a shopping center.

With only 2% of pine rockland remaining, I find it sad to know it can dwindle to complete extinction in my lifetime with ongoing situations such as this.

I was born & raised in Miami, and I remember exploring pine rockland as part of my childhood. It is one of the few staple of nature that is almost exclusive to our region. It is a sense of pride and connection to us who have lived here all our life. And now, a faceless development company that is not from our area is coming to put the final nails in the coffin of our soon to be extinct land.

I ask that you please consider this email, and the countless messages from the local community. If things continue this path, there will be no more pine rockland, and I would hope that you would understand and not want this to have occurred under your watch. Please do what you can with all of your power to make a stand and preserve the little we have left of our pine rockland.

I thank you for your time.

Reuben Molinares

**From:** [REDACTED]  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Comments and concerns. Coral Reef Commons  
**Date:** Thursday, March 23, 2017 10:25:36 AM

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I oppose the development of the small remaining amount of Pine Rocklands in South Miami, it should be protected, not developed!

We demand a full, local public hearing so our voices of opposition can be heard loud and clear. The proposed "preferred alternative development" is inconceivable when you think of the endangered species that depend on this diminishing habitat. This project does not avoid, minimize, or mitigate impacts to eight threatened, endangered, and at-risk species in Miami-Dade county!

How do you plan to allow construction for a 137-acre residential and commercial property on the habitat of the Bartram's scrub-hairstreak butterfly, Florida leafwing butterfly, Fl bonneted bat, eastern indigo snake, rim rock crowned snake, gopher tortoise, Miami tiger beetle and white-crowned pigeon and expect them to survive? Please provide an honest answer.

We will persist in stopping this project.

This type of sprawl is inappropriate.  
Jason Biondi

**From:** [REDACTED]  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Comments for Coral Reef Commons HCP and EA - Save it, Don't pave it!  
**Date:** Thursday, March 23, 2017 10:16:23 AM

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Good morning,

I oppose the development of the small remaining amount of Pine Rocklands in South Miami, it should be protected, not developed!

We demand a full, local public hearing so our voices of opposition can be heard loud and clear. The proposed "preferred alternative development" is inconceivable when you think of the endangered species that depend on this diminishing habitat. This project **does not** avoid, minimize, or mitigate impacts to eight threatened, endangered, and at-risk species in Miami-Dade county!

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We will persist in stopping this project.

Sanna O'Sullivan  
Garden Guru



**Miami Beach Botanical Garden**



Virus-free. [www.avast.com](http://www.avast.com)

**From:** [REDACTED]  
**To:** [David\\_dell@fws.gov](mailto:David_dell@fws.gov); [Ashleigh\\_Blackford@fws.gov](mailto:Ashleigh_Blackford@fws.gov)  
**Cc:** [CRC\\_hcp@fws.gov](mailto:CRC_hcp@fws.gov)  
**Subject:** Coral Reef Commons Draft Habitat Conservation Plan Agency/Docket Number: FWS-R4-ES-2016-N223 Document Number: 2017-05767  
**Date:** Sunday, April 02, 2017 10:06:43 AM

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The entire Richmond Pine Rockland tract surrounding Miami's MetroZoo despite diverse ownership is a single unit from the point of view of the wildlife and plants which do not know boundaries and property lines and take advantage of whatever habitat is available which is adapted to their needs. My direct knowledge of the property is limited to what can be seen from the road and parking lots around the zoo and from the train tour. I would have traipsed the property from end-to-end as is my standard practice when asked to appraised a proposed project. Unfortunately, the property is posted to keep out anyone who might carry out an independent analysis of the land on which the RAM project is proposed to be built and to anyone who might be qualified to determine not simply what species are there now but which ones might potentially return if steps were taken to undo the years of neglect by the University of Miami. Under the supervision of appropriate scientists, habitat change fueled by years of fire-suppression could be reversed through selective logging and removal of detritus and accumulated organic matter and the reintroduction of periodic fire to return the area around the Zoo to its former status as a pine rockland.

More than two years have elapsed since RAM's consultants did a survey of some of the species which might be found on the area slated for development. A broader survey of the whole area around the Zoo is needed and it should be conducted by scientists who do not have a stake in the outcome of the survey. To atone for its neglect of its properties and the tax breaks it has received over the years when the property was designated as "agricultural," the University of Miami could provide the funding and a good part of the expertise needed for such an independent survey. Some of the species show dramatic changes measured in several hundred percent from one-year to the next; thus, scientists need more than one year to do their work. Independent experts should be given the same time that RAM's consultants had available to do this work (approximately 3 years). They should be given access to both the RAM and the Miami Wilds areas and all areas that the University of Miami owns. State and Federal owners of other segments of the Richmond tract should also be asked for permission to carry out a complete inventory first so that we will know what exactly it is that is being proposed for permanent destruction and then estimate the costs of destroying what we have, what it would cost to get back the habitats which have been degraded, and to estimate the costs and any conceivable benefits might be derived from their destruction, which is what the HCP proposes.

The HCP list of interested stakeholders shows no meetings by RAM with the principal coalition opposed to this project: the Miami Pine Rocklands Coalition.

[Eduardo de Aragon](#)  
[REDACTED]

Eddie

"love all, trust a few, do wrong to none" (Shakespeare)

**From:** [REDACTED]  
**To:** ["david\\_dell@fws.gov"](mailto:david_dell@fws.gov); ["ashleigh\\_blackford@fws.gov"](mailto:ashleigh_blackford@fws.gov)  
**Cc:** ["crc\\_hcp@fws.gov"](mailto:crc_hcp@fws.gov)  
**Subject:** Coral Reef Commons Draft Habitat Conservation Plan - Agency/Docket Number: FWS-R4-ES-2016-N223 - Document Number: 2017-05767  
**Date:** Thursday, March 30, 2017 3:41:50 PM  
**Importance:** High

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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

From: Paul Anthony, Miami Pine Rocklands Coalition

Re: Coral Reef Commons Draft Habitat Conservation Plan  
Agency/Docket Number: FWS-R4-ES-2016-N223  
Document Number: 2017-05767

Greetings,

I am begging you to not approve this revised RAM development plan of the Coral Reef Commons or AT LEAST demand a hearing to be heard by court. I was born and still reside in this area. My son and I used to enjoy nature runs and walks near and on this property. We were always under the assumption that the subject land was already protected by the county or neighboring Zoo. Later to shockingly find out that the University of Miami actually owned this land and sold it to the clutches of RAM development. How can I justify proper conservation and "the RIGHT thing to do" to my son when he is witnessing another natural and furthermore endangered forest land be paved over and destroyed? My stomach turns just pondering this. To make matters worse the traffic in the area is already beyond unbearable. This or any other large scale development in this area would turn the already slug moving traffic similar into literally a standing parking lot.

PLEASE PLEASE PLEASE execute your powers to protect this endangered forest, endangered plants and animal species that reside there. Moreover, please produce an everlasting example of proper conservation and stewardship to our youth by "doing the RIGHT THING" by instilling a natural park.

I along with our VP Cully Waggoner have read the original Ram Developments Habitat Conservation Plan for Coral Reef Commons and it is 504 pages of nonsense prepared in May 2015 by Johnson Engineering of Fort Myers, Florida. I have also read the 172 page Coral Reef Commons Draft Habitat Conservation Plan which was revised by Johnson Engineering in February 2017. While a lot of it is the same, one major difference is almost 51 acres Off Site Mitigation that was not part of the original plan and only appears to have been thrown in to make Ram look better to environmentalists.

In the revised HCP, Ram Development refuses to acknowledge most of the more than a dozen endangered, threatened or rare animal and plant species on the site and that call the Richmond Pine Rocklands home. The 2,100 acre Richmond Pine Rocklands are a "Life Boat Habitat" and the ONLY place in the World that they can live. The HCP minimizes the impact and breaks it down to only 8 animal species and of those 8, only, one, the Bartram's scrub-hairstreak butterfly has according to the HCP been documented on the CRC Property.

By comparison the original HCP listed 20 different "potential" animal species. It also noted that the Bartram's scrub-hairstreak butterfly was found on the property multiple times. However, the fact that a Fairchild Tropical Gardens person inadvertently posted a picture of it on Ram property might be why they had to acknowledge it exists there.

So, what happened to the other 12 species in the revised HCP? Unlike humans, animals and plants do not see property lines, and do not know that fences divide them. The Florida Bonneted Bat and the Butterflies fly and the Crown Rim Rock and the Eastern Indigo snakes slither all over and the plants they require grow all over the Richmond Pine Rocklands, including the Coral Reef Commons site.

The HCP refuses to recognize that the site was a toxic nuclear waste site, a Superfund Site, when the University of Miami did nuclear radiation experiments on primates and buried the exposed primate carcasses in trenches on the site and were fined by the Army Corps of Engineers as part of the cleanup. The word Radioactive does not appear anywhere in either the original or revised HCP.

While it acknowledges that Coral Reef Commons is 86 acres of mixed use development and 52 acres of conservation land it fails to note that only 88 acres of the 138 total acres has already been acquired by Ram Development that the rest of it remains in the hands of the University of Miami. UM has said privately to the Miami Pine Rocklands Coalition they intend to uphold the rest of their contract and sell Ram most of the remaining land that they were given for free by the Federal Government but they have yet to set a Sell Date for Phase 2 and 3 of the deal.

Ram Development down plays the total destruction of 86 plus acres of the last 2% of

remaining original Pine Rockland in Miami-Dade County. For a Walmart Super Center with additional retail and restaurant space along with upwards of 900 residential apartments They are requesting a "Take Permit" to validate their reasons for causing the extinction of several Federal and State endangered and threaten species. They minimize the impact of the species that they reluctantly had to include in the HCP that were found on the site while outright ignoring others that have been documented on the site in the past.

Nor does the HPC acknowledge that Pine Rocklands themselves are a globally imperiled and endangered habitat and that they can ONLY be found in South Florida, some parts of the Caribbean and Cuba. "The Miami Rock Ridge" is a ridge of zoolitic limestone the stretched from North Miami south to Florida City and the Everglades has been over developed because it was high ground. The threat of development continues not only with Coral Reef Commons, but Miami Wilds, a Universal Studios style theme / water park from 20th Century Fox and Sony.

I openly question why the Fish and Wildlife Service would even issue an Incidental Take Permit (ITP) to Ram Development to kill Endangered Species that FWS IS SUPPOSED TO BE PROTECTING IN THE FIRST PLACE! FWS historically has worked honorably and diligently to get these species on the Endangered Species List and to save them in the first place. To allow any Developer to cause the imminent extinction of any species because they want to put up another Walmart is beyond me. There are several other viable, non-Pine Rocklands, non-environmentally sensitive sites without endangered and threatened species living on it around Miami-Dade County that could be used if we really did need another Walmart.

I feel that I am uniquely qualified to comment on this HCP, not only because I am Vice President of the Miami Pine Rocklands Coalition, but that I am and have been on the Richmond Pine Rocklands nearly every weekend for the last three years. I volunteer at the Gold Coast Railroad Museum, less than 1,000 feet away from the southern border of the Coral Reef Commons property. I started volunteering at the Gold Coast to be able to keep an eye on my beloved Pine Rocklands, now I'm the Trainmaster and Yardmaster and I run the trains.

I want to make it clear to FWS, that I represent MYSELF in this matter. Not the Gold Coast Railroad Museum and not even the Miami Pine Rocklands Coalition, but simply myself. When I moved to the Deerwood area in 1990 I knew that most of the land around Metro Zoo was protected and in Local, State or Federal ownership. I never imagined that a Walmart would be put up right next to the Zoo Miami Main Entrance or a mega theme / water park would be put on the land either. I want to keep it that way and I expect FWS to do it.

There are so many valid reason for FWS to deny this HCP and deny Ram Development to build Coral Reef Commons regardless of plan, here is a Top 5.

- 1). Causing the extinction of one or more animal or plant species that require the Richmond Pine Rockland Habitat to survive.
- 2). Causing the continued destruction of original Pine Rockland and the Miami Rock Ridge.
- 3). Increased traffic on Coral Reef Drive, SW 152 Street, which currently handles 60,000 cars per day and with a Walmart and a Theme Park next to Zoo Miami, will easily add 30,000 more cars daily on a road than CANNOT be physically expanded or modified to handle it. It is the only street into or out of the area that currently is overburdened and there is no way to fix it.
- 4). Loss of Property Values for thousands of homeowners living in the Deerwood, Bonita Lakes, Three Lakes, and Richmond West areas.
- 5). Loss of Quality of Life for all citizens of Miami-Dade County. We have become a concrete jungle, we tear down the old but the new we put up is not always good. We desperately need more green space, to put it simply we need the trees. Losing even more trees and greenspace, especially Pine Rocklands is NOT a viable option.

While there are many reasons for FWC to deny the HCP and deny Coral Reef Commons to be built, there is only one reason to approve it. The ONE and ONLY reason to approve the HCP is the allow Peter Cummings and Ram Realty to make an obscene amount of money while destroying our unique South Florida Pine Rocklands ecosystem and causing Endangered and Threatened animal and plant species to become extinct.

I am counting on Fish and Wildlife Service to do the right thing, please do not let me and the rest of the citizens and endangered species of Miami-Dade County down.

Best Regards,

Paul Anthony  
Associate Portfolio Manager  
Bayview Loan Servicing, LLC  
NMLS ID: 9061



Equal Housing Lender

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attempt to collect a debt, and any information obtained will be used for that purpose. To the extent that your obligation has been discharged or is subject to an automatic stay in bankruptcy, this notice is for information purposes only and does not constitute a demand of payment or any attempt to collect such obligation. The information contained in this email is confidential for the sole use of the intended recipient. Any use, distribution, transmittal or re-transmittal of information contained in this email by persons who are not intended recipients is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies

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**From:** [REDACTED]  
**To:** [david\\_dell@fws.gov](mailto:david_dell@fws.gov)  
**Cc:** [ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov); [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Coral Reef Commons Draft Habitat Conservation Plan Agency/Docket Number: FWS-R4-ES-2016-N223 Document Number: 2017-05767  
**Date:** Saturday, March 25, 2017 9:43:52 AM

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Greetings FWS friends,

I am begging you to not approve this revised RAM development plan of the Coral Reef Commons. I was born and still reside in this area. My son and I used to enjoy nature runs and walks near and on this property. We were always under the assumption that the subject land was already protected by the county or neighboring Zoo. Later to shockingly find out that the University of Miami actually owned this land and sold it to the clutches of RAM development.

How can I justify proper conservation and "the RIGHT thing to do" to my son when he is witnessing another natural and furthermore endangered forest land be paved over and destroyed? My stomach turns just pondering this. To make matters worse the traffic in the area is already beyond unbearable. This or any other large scale development in this area would turn the already slug moving traffic similar into literally a standing parking lot.

PLEASE PLEASE PLEASE execute your powers to protect this endangered forest, endangered plants and animal species that reside there. Moreover, please produce an everlasting example of proper conservation and stewardship to our youth by "doing the RIGHT THING" by instilling a natural park.

Respectfully,

Paul Anthony

Sent from my T-MobileG LTE Device

**From:** [REDACTED]  
**To:** [David\\_dell@fws.gov](mailto:David_dell@fws.gov); [Ashleigh\\_Blackford@fws.gov](mailto:Ashleigh_Blackford@fws.gov); [CRC\\_hcp@fws.gov](mailto:CRC_hcp@fws.gov)  
**Subject:** Coral Reef Commons Draft Habitat Conservation Plan Agency/Docket Number: FWS-R4-ES-2016-N223 Document Number: 2017-05767  
**Date:** Sunday, April 02, 2017 5:04:48 PM

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The entire Richmond Pine Rockland tract surrounding Miami's MetroZoo despite diverse ownership is a single unit from the point of view of the wildlife and plants which do not know boundaries and property lines and take advantage of whatever habitat is available which is adapted to their needs. My direct knowledge of the property is limited to what can be seen from the road and parking lots around the zoo and from the train tour. I would have traipsed the property from end-to-end as is my standard practice when asked to appraised a proposed project. Unfortunately, the property is posted to keep out anyone who might carry out an independent analysis of the land on which the RAM project is proposed to be built and to anyone who might be qualified to determine not simply what species are there now but which ones might potentially return if steps were taken to undo the years of neglect by the University of Miami. Under the supervision of appropriate scientists, habitat change fueled by years of fire-suppression could be reversed through selective logging and removal of detritus and accumulated organic matter and the reintroduction of periodic fire to return the area around the Zoo to its former status as a pine rockland.

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The HCP list of interested stakeholders shows no meetings by RAM with the principal coalition opposed to this project: the Miami Pine Rocklands Coalition.

Jeri Pollock-Leite  
[REDACTED]

--

I pledge allegiance to the earth  
And all the life which it supports,  
One planet in our care,

Irreplaceable,  
With sustenance and respect for all.

**From:** [REDACTED]  
**To:** [david\\_dell@fws.gov](mailto:david_dell@fws.gov); Ashleigh Blackford FWS; [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Coral Reef Commons Draft Habitat Conservation Plan  
**Date:** Friday, March 24, 2017 1:22:03 AM

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To: Mr. David Dell, Regional HCP Coordinator, Atlanta

[david\\_dell@fws.gov](mailto:david_dell@fws.gov).

CC: Ashleigh Blackford, Supervisory Wildlife Biologist, South Florida Ecological Services

[ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov)

[crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)

From: Cully Waggoner, Vice President of the Miami Pine Rocklands Coalition

[REDACTED]

Re: Coral Reef Commons Draft Habitat Conservation Plan

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

Document Number: 2017-05767

Dear Sir(s)

I have read the original Ram Developments Habitat Conservation Plan for Coral Reef Commons and it is 504 pages of nonsense prepared in May 2015 by Johnson Engineering of Fort Myers, Florida. I have also read the 172 page Coral Reef Commons Draft Habitat Conservation Plan which was revised by Johnson Engineering in February 2017. While a lot of it is the same, one major difference is almost 51 acres Off Site Mitigation that was not part of the original plan and only appears to have been thrown in to make Ram look better to environmentalists.

In the revised HCP, Ram Development refuses to acknowledge most of the more than a dozen endangered, threatened or rare animal and plant species on the site and that call the Richmond Pine Rocklands home. The 2,100 acre Richmond Pine Rocklands are a "Life Boat Habitat" and the ONLY place in the World that they can live. The HCP minimizes the impact and breaks it down to only 8 animal species and of those 8, only, one, the Bartram's scrub-

hairstreak butterfly has according to the HCP been documented on the CRC Property.

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Ram Development down plays the total destruction of 86 plus acres of the last 2% of remaining original Pine Rockland in Miami-Dade County. For a Walmart Super Center with additional retail and restaurant space along with upwards of 900 residential apartments They are requesting a “Take Permit” to validate their reasons for causing the extinction of several Federal and State endangered and threaten species. They minimize the impact of the species that they reluctantly had to include in the HCP that were found on the site while outright ignoring others that have been documented on the site in the past.

Nor does the HPC acknowledge that Pine Rocklands themselves are a globally imperiled and endangered habitat and that they can ONLY be found in South Florida, some parts of the Caribbean and Cuba. “The Miami Rock Ridge” is a ridge of oolitic limestone the stretched from North Miami south to Florida City and the Everglades has been over developed because it was high ground. The threat of development continues not only with Coral Reef Commons,

but Miami Wilds, a Universal Studios style theme / water park from 20<sup>th</sup> Century Fox and Sony.

I openly question why the Fish and Wildlife Service would even issue an Incidental Take Permit (ITP) to Ram Development to kill Endangered Species that FWS IS SUPPOSED TO BE PROTECTING IN THE FIRST PLACE! FWS historically has worked honorably and diligently to get these species on the Endangered Species List and to save them in the first place. To allow any Developer to cause the imminent extinction of any species because they want to put up another Walmart is beyond me. There are several other viable, non-Pine Rocklands, non-environmentally sensitive sites without endangered and threatened species living on it around Miami-Dade County that could be used if we really did need another Walmart.

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I want to make it clear to FWS, that I represent MYSELF in this matter. Not the Gold Coast Railroad Museum and not even the Miami Pine Rocklands Coalition, but simply myself. When I moved to the Deerwood area in 1990 I knew that most of the land around MetroZoo was protected and in Local, State or Federal ownership. I never imagined that a Walmart would be put up right next to the ZooMiami Main Entrance or a mega theme / water park would be put on the land either. I want to keep it that way and I expect FWS to do it.

There are so many valid reason for FWS to deny this HCP and deny Ram Development to build Coral Reef Commons regardless of plan, here is a Top 5.

- 1). Causing the extinction of one or more animal or plant species that require the Richmond Pine Rockland Habitat to survive.
  
- 2). Causing the continued destruction of original Pine Rockland and the Miami Rock Ridge.
  
- 3). Increased traffic on Coral Reef Drive, SW 152 Street, which currently handles 60,000 cars per day and with a Walmart and a Theme Park next to ZooMiami, will easily add 30,000 more cars daily on a road than CANNOT be physically expanded or modified to handle it. It is the

only street into or out of the area that currently is overburdened and there is no way to fix it.

4). Loss of Property Values for thousands of homeowners living in the Deerwood, Bonita Lakes, Three Lakes, and Richmond West areas.

5). Loss of Quality of Life for all citizens of Miami-Dade County. We have become a concrete jungle, we tear down the old but the new we put up is not always good. We desperately need more green space, to put it simply we need the trees. Losing even more trees and greenspace, especially Pine Rocklands is NOT a viable option.

While there are many reasons for FWC to deny the HCP and deny Coral Reef Commons to be built, there is only one reason to approve it. The ONE and ONLY reason to approve the HCP is the allow Peter Cummings and Ram Realty to make an obscene amount of money while destroying our unique South Florida Pine Rocklands ecosystem and causing Endangered and Threatened animal and plant species to become extinct.

I am counting on Fish and Wildlife Service to do the right thing, please do not let me and the rest of the citizens and endangered species of Miami-Dade County down.

Regards,

--

***Cully Waggoner***

Vice President, Miami Pine Rocklands Coalition

**Personal:**

[REDACTED]

**From:** [REDACTED]  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Coral Reef Commons Draft Habitat Conservation Plan  
**Date:** Friday, March 31, 2017 1:47:38 PM

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"We continue to have concerns just because this is such a rare habitat," says Jackie Lopez, the Florida director of the Center for Biological Diversity. "It supports a lot of species that don't really exist anywhere else."

"To allow any developer to cause the imminent extinction of any species because they want to put up another Walmart is beyond me," C. Waggoner wrote.

Florida is reaching the "tipping point" when it comes to population, and development. All another Walmart will do is drain even more money from the state – to say nothing about destroying local business efforts.

V/R

Rodney D. Peterson, Ph D  
Florida Resident

Sent from [Mail](#) for Windows 10

**From:** [REDACTED]  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Coral Reef Commons HCP and EA - SW 152nd St project - Miami Dade County - FI  
**Date:** Monday, April 03, 2017 11:13:18 AM

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I live in this area and use SW 152<sup>nd</sup> St daily passing in front of the area that is marked for development, next to the Metrozoo. Back in 1995 it took me 8 minutes in the middle of rush hours to reach the Turnpike ramp from my home in Country Walk, that was when SW 152<sup>nd</sup> was a 2 lane road, now SW 152<sup>nd</sup> street is a 6 lanes road total and to drive that distance in rush hours takes me 30 minutes in a good day, the bottlenecks are incredible.

With the construction of a shopping center – Walmart – Target or whatever you are planning plus additional retail area we will be jammed in the Country Walk area with traffic that will duplicate or triplicate the actual volume; what are Miami Dade County planners thinking on ? did they ever drive in this area ? this is pure insanity.

Sincerely

Rafael Quesada

[REDACTED]  
[REDACTED]  
[REDACTED]



This email has been checked for viruses by Avast antivirus software.

[www.avast.com](http://www.avast.com)

**From:** [REDACTED]  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Coral Reef Commons HCP and EA  
**Date:** Thursday, March 23, 2017 5:35:46 PM

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Good afternoon

I hope all is well. I would like to share my displeasure and disgust in the RAM/UM Project titled Coral Reef Commons. This habitat is home to an endangered wildlife and ecosystem that is quickly disappearing in South Florida. This draft or preferred alternative is not going to avoid, minimize, and mitigate impacts, to maintain the covered species, as well as protection and management of off-site restoration lands. There are no off-site lands available for restoration for the land and species that will be eradicated and put into extinction if this project is approved.

As a resident in the area, I would like to request that public meetings are held once again and notification of the immediately surrounding areas be notified of the meeting. This issue has not been discussed in over three years and many residents believe that this project was unapproved.

Thank you for your time

John Meizoso

[REDACTED]

**From:** [REDACTED]  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Coral Reef Commons HCP and EA  
**Date:** Sunday, April 02, 2017 2:09:02 PM

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PLEASE do NOT ruin what little wild places we have left.....some of it is found nowhere else and would have nowhere to go. Plus we do NOT need more traffic on SW 152 ST! It is horrible as it is. Do not allow this to happen!

Thank you,  
Darlene Melcon

[REDACTED]

**From:** [REDACTED]  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Coral Reef Commons  
**Date:** Thursday, March 23, 2017 5:46:13 PM

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To whom it may concern

I am hereby requesting as many of us are, a hearing regarding the proposed construction at the coral reef Commons which holds Pine Rocklands, an endangered habitats that holds many species that are only seen in areas such as the site where the proposed buildings will be - the Coral Reef Commons. Please keep me informed of any meetings or any plans, or notices regarding the fragile ecosystem that lies within the Coral Reef Commons and their current owner's plans.

Cordially, Julio C Ortega

**From:** [REDACTED]  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Coral Reef Commons  
**Date:** Friday, March 31, 2017 7:59:09 AM

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Urge you to protect this remnant endangered habitat.

Once destroyed it is irreplaceable.

Ellen Siegel

Sent from my iPhone. Please excuse any typos!

**From:** [REDACTED]  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Dade county Pine Rocklands  
**Date:** Friday, March 24, 2017 11:04:13 AM

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To whom it may concern,

I am a Miami-Dade county citizen, and I feel it is of the Utmost Importance to preserve the Richmond Pine Rocklands from development for all generations. The sale by the University of Miami to Ram Realty to build a Wal-Mart, I find completely unreasonable and shameful.. These lands need to be protected period.

Sincerely,  
Michael E. Whitney

Sent from my Sprint Samsung Galaxy S7.

**From:** [Ashleigh Blackford](#)  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** FW: Comment on the RAM Realty "Habitat Conservation Plan" (HCP) submitted February 2017  
**Date:** Thursday, March 30, 2017 8:27:03 AM  
**Attachments:** [EconAnalysisofRAM\\_HCPFeb2017on170326.docx](#)

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**From:** Jeff Dorsey [mailto:  
**Sent:** Wednesday, March 29, 2017 7:04 PM  
**To:** Ashleigh Blackford  
**Cc:** [David\\_dell@fws.gov](mailto:David_dell@fws.gov)  
**Subject:** Comment on the RAM Realty "Habitat Conservation Plan" (HCP) submitted February 2017

Dear Ms. Blackford:

My comments on this document are attached.

With input from the public and independent scientists, I'm sure that it will be possible to come up with a plan which really does conserve the Richmond pine rocklands that will then be acceptable to the FWS.

With kind regards,

Dr. Jeff Dorsey  
Agriculture, Business, Credit and Development LLC



**From:** [Ashleigh Blackford](#)  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** FW: Coral Reef Commons Draft Habitat Conservation Plan Agency/Docket Number: FWS-R4-ES-2016-N223  
Document Number: 2017-05767  
**Date:** Tuesday, April 04, 2017 2:12:49 PM

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**From:** Luis Garcia [mailto:████████████████████]  
**Sent:** Monday, April 03, 2017 2:43 PM  
**To:** [david\\_dell@fws.gov](mailto:david_dell@fws.gov); [ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov)  
**Subject:** Coral Reef Commons Draft Habitat Conservation Plan Agency/Docket Number: FWS-R4-ES-2016-N223 Document Number: 2017-05767

Hello Mr. Dell and Mrs. Blackford,

I am Luis Garcia Falcon, a resident and citizen of Miami and I am emailing to voice my opposition to the development of the Richmond Pine Rockland Habitat into a Walmart. Not only in this habitat have they found rare species that could be killed in the process of development but, also it destroys an endangered ecosystem of South Florida which is Pine Rockland, which barely exists anymore. Additionally, not only nature will be affected but also, the traffic flow of SW 152nd will be affected drastically increasing noise pollution and pollution in general and traffic congestion in that area, leading to property value loss and loss of quality of life for all of Miami-Dade. Also, If anything I request that a public hearing is carried out on this matter.

--

Sincerely,

Luis Garcia

**From:** [REDACTED]  
**To:** ["ashleigh\\_blackford@fws.gov"](mailto:ashleigh_blackford@fws.gov); ["david\\_dell@fws.gov"](mailto:david_dell@fws.gov)  
**Cc:** ["crc\\_hcp@fws.gov"](mailto:crc_hcp@fws.gov)  
**Subject:** FW: Coral Reef Commons Draft Habitat Conservation Plan - Agency/Docket Number: FWS-R4-ES-2016-N223 - Document Number: 2017-05767  
**Date:** Thursday, March 30, 2017 3:42:43 PM  
**Importance:** High

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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

From: Paul Anthony, Miami Pine Rocklands Coalition

Re: Coral Reef Commons Draft Habitat Conservation Plan  
Agency/Docket Number: FWS-R4-ES-2016-N223  
Document Number: 2017-05767

Greetings,

I am begging you to not approve this revised RAM development plan of the Coral Reef Commons or AT LEAST demand a hearing to be heard by court. I was born and still reside in this area. My son and I used to enjoy nature runs and walks near and on this property. We were always under the assumption that the subject land was already protected by the county or neighboring Zoo. Later to shockingly find out that the University of Miami actually owned this land and sold it to the clutches of RAM development. How can I justify proper conservation and "the RIGHT thing to do" to my son when he is witnessing another natural and furthermore endangered forest land be paved over and destroyed? My stomach turns just pondering this. To make matters worse the traffic in the area is already beyond unbearable. This or any other large scale development in this area would turn the already slug moving traffic similar into literally a standing parking lot.

PLEASE PLEASE PLEASE execute your powers to protect this endangered forest, endangered plants and animal species that reside there. Moreover, please produce an everlasting example of proper conservation and stewardship to our youth by "doing the RIGHT THING" by instilling a natural park.

I along with our VP Cully Waggoner have read the original Ram Developments Habitat

Conservation Plan for Coral Reef Commons and it is 504 pages of nonsense prepared in May 2015 by Johnson Engineering of Fort Myers, Florida. I have also read the 172 page Coral Reef Commons Draft Habitat Conservation Plan which was revised by Johnson Engineering in February 2017. While a lot of it is the same, one major difference is almost 51 acres Off Site Mitigation that was not part of the original plan and only appears to have been thrown in to make Ram look better to environmentalists.

In the revised HCP, Ram Development refuses to acknowledge most of the more than a dozen endangered, threatened or rare animal and plant species on the site and that call the Richmond Pine Rocklands home. The 2,100 acre Richmond Pine Rocklands are a "Life Boat Habitat" and the ONLY place in the World that they can live. The HCP minimizes the impact and breaks it down to only 8 animal species and of those 8, only, one, the Bartram's scrub-hairstreak butterfly has according to the HCP been documented on the CRC Property.

By comparison the original HCP listed 20 different "potential" animal species. It also noted that the Bartram's scrub-hairstreak butterfly was found on the property multiple times. However, the fact that a Fairchild Tropical Gardens person inadvertently posted a picture of it on Ram property might be why they had to acknowledge it exists there.

So, what happened to the other 12 species in the revised HCP? Unlike humans, animals and plants do not see property lines, and do not know that fences divide them. The Florida Bonneted Bat and the Butterflies fly and the Crown Rim Rock and the Eastern Indigo snakes slither all over and the plants they require grow all over the Richmond Pine Rocklands, including the Coral Reef Commons site.

The HCP refuses to recognize that the site was a toxic nuclear waste site, a Superfund Site, when the University of Miami did nuclear radiation experiments on primates and buried the exposed primate carcasses in trenches on the site and were fined by the Army Corps of Engineers as part of the cleanup. The word Radioactive does not appear anywhere in either the original or revised HCP.

While it acknowledges that Coral Reef Commons is 86 acres of mixed use development and 52 acres of conservation land it fails to note that only 88 acres of the 138 total acres has already been acquired by Ram Development that the rest of it remains in the hands of the University of Miami. UM has said privately to the Miami Pine Rocklands Coalition they intend to uphold the rest of their contract and sell Ram most of the remaining land that they were given for free by the Federal Government but they have yet to set a Sell Date for Phase 2 and 3 of the deal.

Ram Development down plays the total destruction of 86 plus acres of the last 2% of remaining original Pine Rockland in Miami-Dade County. For a Walmart Super Center with

additional retail and restaurant space along with upwards of 900 residential apartments They are requesting a "Take Permit" to validate their reasons for causing the extinction of several Federal and State endangered and threaten species. They minimize the impact of the species that they reluctantly had to include in the HCP that were found on the site while outright ignoring others that have been documented on the site in the past.

Nor does the HPC acknowledge that Pine Rocklands themselves are a globally imperiled and endangered habitat and that they can ONLY be found in South Florida, some parts of the Caribbean and Cuba. "The Miami Rock Ridge" is a ridge of zoolitic limestone the stretched from North Miami south to Florida City and the Everglades has been over developed because it was high ground. The threat of development continues not only with Coral Reef Commons, but Miami Wilds, a Universal Studios style theme / water park from 20th Century Fox and Sony.

I openly question why the Fish and Wildlife Service would even issue an Incidental Take Permit (ITP) to Ram Development to kill Endangered Species that FWS IS SUPPOSED TO BE PROTECTING IN THE FIRST PLACE! FWS historically has worked honorably and diligently to get these species on the Endangered Species List and to save them in the first place. To allow any Developer to cause the imminent extinction of any species because they want to put up another Walmart is beyond me. There are several other viable, non-Pine Rocklands, non-environmentally sensitive sites without endangered and threatened species living on it around Miami-Dade County that could be used if we really did need another Walmart.

I feel that I am uniquely qualified to comment on this HCP, not only because I am Vice President of the Miami Pine Rocklands Coalition, but that I am and have been on the Richmond Pine Rocklands nearly every weekend for the last three years. I volunteer at the Gold Coast Railroad Museum, less than 1,000 feet away from the southern border of the Coral Reef Commons property. I started volunteering at the Gold Coast to be able to keep an eye on my beloved Pine Rocklands, now I'm the Trainmaster and Yardmaster and I run the trains.

I want to make it clear to FWS, that I represent MYSELF in this matter. Not the Gold Coast Railroad Museum and not even the Miami Pine Rocklands Coalition, but simply myself. When I moved to the Deerwood area in 1990 I knew that most of the land around Metro Zoo was protected and in Local, State or Federal ownership. I never imagined that a Walmart would be put up right next to the Zoo Miami Main Entrance or a mega theme / water park would be put on the land either. I want to keep it that way and I expect FWS to do it.

There are so many valid reason for FWS to deny this HCP and deny Ram Development to build Coral Reef Commons regardless of plan, here is a Top 5.

- 1). Causing the extinction of one or more animal or plant species that require the Richmond

Pine Rockland Habitat to survive.

2). Causing the continued destruction of original Pine Rockland and the Miami Rock Ridge.

3). Increased traffic on Coral Reef Drive, SW 152 Street, which currently handles 60,000 cars per day and with a Walmart and a Theme Park next to Zoo Miami, will easily add 30,000 more cars daily on a road than CANNOT be physically expanded or modified to handle it. It is the only street into or out of the area that currently is overburdened and there is no way to fix it.

4). Loss of Property Values for thousands of homeowners living in the Deerwood, Bonita Lakes, Three Lakes, and Richmond West areas.

5). Loss of Quality of Life for all citizens of Miami-Dade County. We have become a concrete jungle, we tear down the old but the new we put up is not always good. We desperately need more green space, to put it simply we need the trees. Losing even more trees and greenspace, especially Pine Rocklands is NOT a viable option.

While there are many reasons for FWC to deny the HCP and deny Coral Reef Commons to be built, there is only one reason to approve it. The ONE and ONLY reason to approve the HCP is the allow Peter Cummings and Ram Realty to make an obscene amount of money while destroying our unique South Florida Pine Rocklands ecosystem and causing Endangered and Threatened animal and plant species to become extinct.

I am counting on Fish and Wildlife Service to do the right thing, please do not let me and the rest of the citizens and endangered species of Miami-Dade County down.

Best Regards,

Paul Anthony  
Associate Portfolio Manager  
Bayview Loan Servicing, LLC  
NMLS ID: 9061



Equal Housing Lender

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**From:** [Ashleigh Blackford](#)  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** FW: Coral Reef Commons Draft Habitat Conservation Plan Agency/Docket Number: FWS-R4-ES-2016-N223 Document Number: 2017-05767  
**Date:** Tuesday, April 04, 2017 2:13:13 PM

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**From:** Eric Streett [mailto:████████████████████]  
**Sent:** Monday, April 03, 2017 1:28 PM  
**To:** [David\\_dell@fws.gov](mailto:David_dell@fws.gov); [Ashleigh\\_Blackford@fws.gov](mailto:Ashleigh_Blackford@fws.gov)  
**Subject:** Coral Reef Commons Draft Habitat Conservation Plan Agency/Docket Number: FWS-R4-ES-2016-N223 Document Number: 2017-05767

The entire Richmond Pine Rockland tract surrounding Miami's MetroZoo despite diverse ownership is a single unit from the point of view of the wildlife and plants which do not know boundaries and property lines and take advantage of whatever habitat is available which is adapted to their needs. My direct knowledge of the property is limited to what can be seen from the road and parking lots around the zoo and from the train tour. I would have traipsed the property from end-to-end as is my standard practice when asked to appraised a proposed project. Unfortunately, the property is posted to keep out anyone who might carry out an independent analysis of the land on which the RAM project is proposed to be built and to anyone who might be qualified to determine not simply what species are there now but which ones might potentially return if steps were taken to undo the years of neglect by the University of Miami. Under the supervision of appropriate scientists, habitat change fueled by years of fire-suppression could be reversed through selective logging and removal of detritus and accumulated organic matter and the reintroduction of periodic fire to return the area around the Zoo to its former status as a pine rockland.

More than two years have elapsed since RAM's consultants did a survey of some of the species which might be found on the area slated for development. A broader survey of the whole area around the Zoo is needed and it should be conducted by scientists who do not have a stake in the outcome of the survey. To atone for its neglect of its properties and the tax breaks it has received over the years when the property was designated as "agricultural," the University of Miami could provide the funding and a good part of the expertise needed for such an independent survey. Some of the species show dramatic changes measured in several hundred percent from one-year to the next; thus, scientists need more than one year to do their work. Independent experts should be given the same time that RAM's consultants had available to do this work (approximately 3 years). They should be given access to both the RAM and the Miami Wilds areas and all areas that the University of Miami owns. State and Federal owners of other segments of the Richmond tract should also be asked for permission to carry out a complete inventory first so that we will know what exactly it is that is being proposed for permanent destruction and then

estimate the costs of destroying what we have, what it would cost to get back the habitats which have been degraded, and to estimate the costs and any conceivable benefits might be derived from their destruction, which is what the HCP proposes.

The HCP list of interested stakeholders shows no meetings by RAM with the principal coalition opposed to this project: the Miami Pine Rocklands Coalition.

Thank you for your consideration,

Eric Streett

[REDACTED]  
[REDACTED]  
[REDACTED]

**From:** [Ashleigh Blackford](#)  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** FW: Correction of Error in Comment on the RAM Realty "Habitat Conservation Plan" (HCP) submitted February 2017  
**Date:** Monday, April 03, 2017 8:37:25 AM

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**From:** Jeff Dorsey [mailto:████████████████████]  
**Sent:** Saturday, April 01, 2017 9:08 AM  
**To:** Ashleigh Blackford  
**Cc:** [David\\_dell@fws.gov](mailto:David_dell@fws.gov)  
**Subject:** Re: Correction of Error in Comment on the RAM Realty "Habitat Conservation Plan" (HCP) submitted February 2017

Dear Ms. Blackford:

I found the following error in the comment I sent you a few days ago, which is corrected here.

With kind regards,

"introducing a systematic regime of controlled fire every 2-4 years [CORRECTION, should be: 3-7 years]  
(UF-IFAS, [http://solutionsforyourlife.ufl.edu/hot\\_topics/environment/fire\\_habitat.shtml](http://solutionsforyourlife.ufl.edu/hot_topics/environment/fire_habitat.shtml))"

Dr. Jeff Dorsey  
Agriculture, Business, Credit and Development LLC

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**From:** Jeff Dorsey [mailto:████████████████████]  
**To:** Ashleigh Blackford <[ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov)>  
**Cc:** "[David\\_dell@fws.gov](mailto:David_dell@fws.gov)" <[David\\_dell@fws.gov](mailto:David_dell@fws.gov)>  
**Sent:** Wednesday, March 29, 2017 7:04 PM  
**Subject:** Comment on the RAM Realty "Habitat Conservation Plan" (HCP) submitted February 2017

Dear Ms. Blackford:

My comments on this document are attached.

With input from the public and independent scientists, I'm sure that it will be possible to come up with a plan which really does conserve the Richmond pine rocklands that will then be acceptable to the FWS.

With kind regards,

Dr. Jeff Dorsey  
Agriculture, Business, Credit and Development LLC



**From:** [Ashleigh Blackford](#)  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** FW: Miami Pine Rocklands - Coral Reef Commons  
**Date:** Monday, April 03, 2017 8:41:41 AM

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**From:** Jennifer Patti [mailto:████████████████████]  
**Sent:** Sunday, April 02, 2017 10:05 PM  
**To:** [David\\_dell@fws.gov](mailto:David_dell@fws.gov); [Ashleigh\\_Blackford@fws.gov](mailto:Ashleigh_Blackford@fws.gov)  
**Subject:** Miami Pine Rocklands - Coral Reef Commons

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 longstanding 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.

We hope you will grant the public the opportunity to more fully discuss the impacts of Coral Reef Commons on federal and state endangered and threatened species through a public hearing. I look forward to your reply.

In addition, I would 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.

Sincerely,

Jennifer Meizoso



**From:** [Ashleigh Blackford](#)  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** FW: Miami Rocklands  
**Date:** Tuesday, April 04, 2017 2:13:37 PM

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**From:** Darlene Melcon [mailto:  
**Sent:** Monday, April 03, 2017 12:11 PM  
**To:** [Ashleigh.Blackford@fws.gov](mailto:Ashleigh.Blackford@fws.gov)  
**Subject:** Miami Rocklands

PLEASE do not allow some of the last remnants of wild South Florida to be given over to developers.

This is re FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL

Even if saving this pristine wild habitat is not enough reason, we who live in the area do not need more traffic on the already over-crowded and horrendous SW 152 St or Coral Reef Dr, as it is known by both.

Miami-Dade County is already over-built; every major road and highway is lined with shops and malls.....and any photo of this area will showcase the huge high rises we have everywhere. There are spaces available on said roads where more buildings would just be accepted.

Please do not allow this to happen.

Sincerely,  
Darlene Melcon



**From:** [Ashleigh Blackford](mailto:Ashleigh.Blackford@fws.gov)  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** FW: No Walmart on 152 street  
**Date:** Thursday, March 30, 2017 8:26:39 AM

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-----Original Message-----

From: Robert Valido Prestige Marine [REDACTED]  
Sent: Wednesday, March 29, 2017 6:30 PM  
To: Ashleigh\_Blackford@fws.gov  
Subject: No Walmart on 152 street

Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.

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.

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[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.

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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 longstanding 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.

We hope you will grant the public the opportunity to more fully discuss the impacts of Coral Reef Commons on federal and state endangered and threatened species through a public hearing. I look forward to your reply.

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.

Sincerely,

Sent from my iPhone

**From:** [Ashleigh Blackford](#)  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** FW: Preserve the Richmond Pine Rockland Habitat  
**Date:** Tuesday, April 04, 2017 2:10:56 PM

---

**From:** Maria Gonzalez [mailto:██]  
**Sent:** Tuesday, April 04, 2017 12:43 PM  
**To:** [dell@fws.gov](mailto:dell@fws.gov); [ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov)  
**Subject:** Preserve the Richmond Pine Rockland Habitat

Dear David Dell and Ashleigh Blackford:

I am sending you this email to request a public hearing be held on the preservation of the Richmond Pine Rockland Habitat, the property scheduled to be developed into a Walmart and 900 apartments.

This will be a loss for all Miami-Dade County residents. We cannot continue to give away our green spaces to a concrete jungle. We desperately need the trees and more green spaces for the nourishment of our souls. This will also increase traffic and these roads cannot handle this amount of traffic. Streets are already over saturated. This development will also compromise the existence of wild animals. We cannot continue to push them into extinction.

It is up to us to properly manage and hold off developers that only have profits in mind. You must stand up for the citizens of this county and state.

Thank you for listening to my plea.

Sincerely,

Maria Gonzalez

**From:** [Ashleigh Blackford](#)  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** FW: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Com  
**Date:** Tuesday, April 04, 2017 2:13:59 PM

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-----Original Message-----

**From:** Ty Shlackman [REDACTED]  
**Sent:** Monday, April 03, 2017 11:40 AM  
**To:** David\_dell@fws.gov; Ashleigh\_Blackford@fws.gov  
**Subject:** Re: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Com

April 3, 2017

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.

We hope you will grant the public the opportunity to more fully discuss the impacts of Coral Reef Commons on federal and state endangered and

threatened species through a public hearing. I look forward to your reply.

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.

Sincerely,

Ty Shlackman

**From:** [Ashleigh Blackford](#)  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** FW: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comme  
**Date:** Thursday, April 06, 2017 1:21:48 PM

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**From:** Darlene Melcon [mailto:████████████████████]  
**Sent:** Thursday, April 06, 2017 12:20 PM  
**To:** [David\\_dell@fws.gov](mailto:David_dell@fws.gov); [Ashleigh\\_Blackford@fws.gov](mailto:Ashleigh_Blackford@fws.gov)  
**Subject:** Re: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comme

Re: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.

Dear Mr. Dell and Ms. Blackford,

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

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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.

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Sincerely,

Darlene Melcon

[REDACTED]  
[REDACTED]

**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: 59 Days to comment - Save the PineRocklands  
**Date:** Monday, March 27, 2017 7:07:32 AM

---

David Dell  
Southeast Region  
HCP and Safe Harbors Coordinator  
404/679-7313  
fax: 7081  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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

**From:** PalsAroundtheWorld [REDACTED]  
**Date:** Fri, Mar 24, 2017 at 5:30 PM  
**Subject:** Fwd: 59 Days to comment - Save the PineRocklands  
**To:** [david\\_dell@fws.gov](mailto:david_dell@fws.gov), [ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov)

Please allow for a hearing to protect the endangered species at risk if this project passes. As an alumni of the University of Miami and as the initiator of my own petition when the Miami herald first reported this story capturing 10,000 signatures - and over 100,000 collectively by the Pinerockland Coalition team along with many concerned citizens and growing - I am doing my part and forwarding this letter in the hopes that we can have a fair hearing to salvage what's left of the Pine Rocklands and stop this horrible project from passing. Thank you

Warmest Regards,

Leslye Jacobs  
Executive Director  
Pals Around the World

Sent from my iPhone

Begin forwarded message:

**From:** Miami Pine Rocklands Coalition <[\[REDACTED\]](#)>  
**Date:** March 24, 2017 at 3:54:06 PM EDT  
**To:** [REDACTED]  
**Subject:** 59 Days to comment - Save the PineRocklands  
**Reply-To:** Miami Pine Rocklands Coalition <[\[REDACTED\]](#)>

[org](#)>

Dear Friends:

The clock is ticking and we now have 59 days to let the Feds know what WE think about this horrible project.

We can make a difference if we choose to.

"Save it, Don't Pave It!"

Please consider printing this out and sending it as a letter and email.

Send via Email and Certified Mail Return Receipt

---

March 24, 2017

David Dell

U.S. Fish and Wildlife Service U.S. Fish and Wildlife Service

Atlanta Regional Office,

1875 Century Blvd.

Atlanta, GA 30345

[David\\_dell@fws.gov](mailto:David_dell@fws.gov)

Ashleigh Blackford

South Florida Ecological Services

1339 20th Street

Vero Beach, FL 32960

[Ashleigh\\_Blackford@fws.gov](mailto:Ashleigh_Blackford@fws.gov)

Re: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.

Dear Mr. Dell and Ms. Blackford,

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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.

Sincerely,



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You are a member of the Pine Rocklands Coalition.

**Our mailing address is:**

[Redacted mailing address]

[Add us to your address book](#)

Want to change how you receive these emails?

You can [update your preferences](#) or [unsubscribe from this list](#)



**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: Comment on the RAM Realty "Habitat Conservation Plan" (HCP) submitted February 2017  
**Date:** Thursday, March 30, 2017 7:10:24 AM  
**Attachments:** [EconAnalysisofRAM\\_HCPFeb2017on170326.docx](#)

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David Dell  
Southeast Region  
HCP and Safe Harbors Coordinator  
404/679-7313  
fax: 7081  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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

**From:** Jeff Dorsey [REDACTED]  
**Date:** Wed, Mar 29, 2017 at 7:04 PM  
**Subject:** Comment on the RAM Realty "Habitat Conservation Plan" (HCP) submitted February 2017  
**To:** Ashleigh Blackford <[ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov)>  
**Cc:** "[David\\_dell@fws.gov](mailto:David_dell@fws.gov)" <[David\\_dell@fws.gov](mailto:David_dell@fws.gov)>

Dear Ms. Blackford:

My comments on this document are attached.

With input from the public and independent scientists, I'm sure that it will be possible to come up with a plan which really does conserve the Richmond pine rocklands that will then be acceptable to the FWS.

With kind regards,

Dr. Jeff Dorsey  
Agriculture, Business, Credit and Development LLC

[REDACTED]

**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: Coral Reef Commons development  
**Date:** Monday, March 27, 2017 7:17:33 AM

---

David Dell  
Southeast Region  
HCP and Safe Harbors Coordinator  
404/679-7313  
fax: 7081  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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

**From:** Martha S Bryan [REDACTED]  
**Date:** Sat, Mar 25, 2017 at 9:32 AM  
**Subject:** Coral Reef Commons development  
**To:** [David\\_dell@fws.gov](mailto:David_dell@fws.gov)

Dear David,

Please reconsider developing Coral Reef Commons in south Miami for the following reasons:

Most importantly there are endangered species, plants and Pinelands at risk. Also, this zip code 33186 is the second most populous in Miami Dade County, with an estimated population of 70,000 according to [miamidadematters.org](http://miamidadematters.org). The traffic is currently congested as there are only two major streets running west to east, SW 152 St, and SW 182 (184) St due to the Zoo, The Coast Guard and other undeveloped property which is supposed to be protected. Adding a shopping development and apartment building on 152 St would OVERWHELM this already overburdened traffic area.

Thank you for your prompt attention to this problem.

Martha S Bryan, retired RN, PhD  
[REDACTED]



Sent from my iPad

**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:** Tuesday, April 04, 2017 7:14:36 AM

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David Dell  
Southeast Region  
HCP and Safe Harbors Coordinator  
404/679-7313  
fax: 7081  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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**From:** **luis Garcia** [REDACTED]  
**Date:** Mon, Apr 3, 2017 at 2:42 PM  
**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](mailto:david_dell@fws.gov), [ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov)

Hello Mr. Dell and Mrs. Blackford,

I am Luis Garcia Falcon, a resident and citizen of Miami and I am emailing to voice my opposition to the development of the Richmond Pine Rockland Habitat into a Walmart. Not only in this habitat have they found rare species that could be killed in the process of development but, also it destroys an endangered ecosystem of South Florida which is Pine Rockland, which barely exists anymore. Additionally, not only nature will be affected but also, the traffic flow of SW 152nd will be affected drastically increasing noise pollution and pollution in general and traffic congestion in that area, leading to property value loss and loss of quality of life for all of Miami-Dade. Also, If anything I request that a public hearing is carried out on this matter.

--

Sincerely,

Luis Garcia

**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:** Tuesday, April 04, 2017 7:12:39 AM

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**David Dell**  
**Southeast Region**  
**HCP and Safe Harbors Coordinator**  
**404/679-7313**  
**fax: 7081**  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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**From:** **Eric Streett** [REDACTED]  
**Date:** Mon, Apr 3, 2017 at 1:28 PM  
**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](mailto:David_dell@fws.gov)" <[David\\_dell@fws.gov](mailto:David_dell@fws.gov)>, "[Ashleigh\\_Blackford@fws.gov](mailto:Ashleigh_Blackford@fws.gov)" <[Ashleigh\\_Blackford@fws.gov](mailto:Ashleigh_Blackford@fws.gov)>

The entire Richmond Pine Rockland tract surrounding Miami's MetroZoo despite diverse ownership is a single unit from the point of view of the wildlife and plants which do not know boundaries and property lines and take advantage of whatever habitat is available which is adapted to their needs. My direct knowledge of the property is limited to what can be seen from the road and parking lots around the zoo and from the train tour. I would have traipsed the property from end-to-end as is my standard practice when asked to appraise a proposed project. Unfortunately, the property is posted to keep out anyone who might carry out an independent analysis of the land on which the RAM project is proposed to be built and to anyone who might be qualified to determine not simply what species are there now but which ones might potentially return if steps were taken to undo the years of neglect by the University of Miami. Under the supervision of appropriate scientists, habitat change fueled by years of fire-suppression could be reversed through selective logging and removal of detritus and accumulated organic matter and the reintroduction of periodic fire to return the area around the Zoo to its former status as a pine rockland.

More than two years have elapsed since RAM's consultants did a survey of some of the species which might be found on the area slated for development. A broader survey of the

whole area around the Zoo is needed and it should be conducted by scientists who do not have a stake in the outcome of the survey. To atone for its neglect of its properties and the tax breaks it has received over the years when the property was designated as “agricultural,” the University of Miami could provide the funding and a good part of the expertise needed for such an independent survey. Some of the species show dramatic changes measured in several hundred percent from one-year to the next; thus, scientists need more than one year to do their work. Independent experts should be given the same time that RAM’s consultants had available to do this work (approximately 3 years). They should be given access to both the RAM and the Miami Wilds areas and all areas that the University of Miami owns. State and Federal owners of other segments of the Richmond tract should also be asked for permission to carry out a complete inventory first so that we will know what exactly it is that is being proposed for permanent destruction and then estimate the costs of destroying what we have, what it would cost to get back the habitats which have been degraded, and to estimate the costs and any conceivable benefits might be derived from their destruction, which is what the HCP proposes.

The HCP list of interested stakeholders shows no meetings by RAM with the principal coalition opposed to this project: the Miami Pine Rocklands Coalition.

Thank you for your consideration,

Eric Streett

[REDACTED]  
[REDACTED]  
[REDACTED]

**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:** Thursday, March 30, 2017 3:45:59 PM

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David Dell  
Southeast Region  
HCP and Safe Harbors Coordinator  
404/679-7313  
fax: 7081  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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**From:** Paul Anthony [REDACTED]  
**Date:** Thu, Mar 30, 2017 at 3:40 PM  
**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](mailto:david_dell@fws.gov)" <[david\\_dell@fws.gov](mailto:david_dell@fws.gov)>, "[ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov)" <[ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov)>  
**Cc:** "[crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)" <[crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)>

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

From: Paul Anthony, Miami Pine Rocklands Coalition

Re: Coral Reef Commons Draft Habitat Conservation Plan  
Agency/Docket Number: FWS-R4-ES-2016-N223  
Document Number: 2017-05767

Greetings,

I am begging you to not approve this revised RAM development plan of the Coral Reef Commons or AT LEAST demand a hearing to be heard by court. I was born and still reside in this area. My son and I used to enjoy nature runs and walks near and on this property. We were always under the assumption that the subject land was already protected by the county or neighboring Zoo. Later to shockingly find out that the University of Miami actually owned this land and sold it to the clutches of RAM development. How can I justify proper conservation and "the RIGHT thing to do" to my son when he is witnessing another natural and furthermore endangered forest land be paved over and destroyed? My stomach turns just pondering this. To make matters worse the traffic in the area is already beyond unbearable. This or any other large scale development in this area would turn the already slug moving traffic similar into literally a standing parking lot.

PLEASE PLEASE PLEASE execute your powers to protect this endangered forest, endangered plants and animal species that reside there. Moreover, please produce an everlasting example of proper conservation and stewardship to our youth by "doing the RIGHT THING" by instilling a natural park.

I along with our VP Cully Waggoner have read the original Ram Developments Habitat Conservation Plan for Coral Reef Commons and it is 504 pages of nonsense prepared in May 2015 by Johnson Engineering of Fort Myers, Florida. I have also read the 172 page Coral Reef Commons Draft Habitat Conservation Plan which was revised by Johnson Engineering in February 2017. While a lot of it is the same, one major difference is almost 51 acres Off Site Mitigation that was not part of the original plan and only appears to have been thrown in to make Ram look better to environmentalists.

In the revised HCP, Ram Development refuses to acknowledge most of the more than a dozen endangered, threatened or rare animal and plant species on the site and that call the Richmond Pine Rocklands home. The 2,100 acre Richmond Pine Rocklands are a "Life Boat Habitat" and the ONLY place in the World that they can live. The HCP minimizes the impact and breaks it down to only 8 animal species and of those 8, only, one, the Bartram's scrub-hairstreak butterfly has according to the HCP been documented on the CRC Property.

By comparison the original HCP listed 20 different "potential" animal species. It also noted that the Bartram's scrub-hairstreak butterfly was found on the property multiple times. However, the fact that a Fairchild Tropical Gardens person inadvertently posted a picture of it on Ram property might be why they had to acknowledge it exists there.

So, what happened to the other 12 species in the revised HCP? Unlike humans, animals and plants do not see property lines, and do not know that fences divide them. The Florida Bonneted Bat and the Butterflies fly and the Crown Rim Rock and the Eastern Indigo snakes slither all over and the plants they require grow all over the Richmond Pine Rocklands, including the Coral Reef Commons site.

The HCP refuses to recognize that the site was a toxic nuclear waste site, a Superfund Site, when the University of Miami did nuclear radiation experiments on primates and buried the exposed primate carcasses in trenches on the site and were fined by the Army Corps of

Engineers as part of the cleanup. The word Radioactive does not appear anywhere in either the original or revised HCP.

While it acknowledges that Coral Reef Commons is 86 acres of mixed use development and 52 acres of conservation land it fails to note that only 88 acres of the 138 total acres has already been acquired by Ram Development that the rest of it remains in the hands of the University of Miami. UM has said privately to the Miami Pine Rocklands Coalition they intend to uphold the rest of their contract and sell Ram most of the remaining land that they were given for free by the Federal Government but they have yet to set a Sell Date for Phase 2 and 3 of the deal.

Ram Development down plays the total destruction of 86 plus acres of the last 2% of remaining original Pine Rockland in Miami-Dade County. For a Walmart Super Center with additional retail and restaurant space along with upwards of 900 residential apartments They are requesting a "Take Permit" to validate their reasons for causing the extinction of several Federal and State endangered and threaten species. They minimize the impact of the species that they reluctantly had to include in the HCP that were found on the site while outright ignoring others that have been documented on the site in the past.

Nor does the HPC acknowledge that Pine Rocklands themselves are a globally imperiled and endangered habitat and that they can ONLY be found in South Florida, some parts of the Caribbean and Cuba. "The Miami Rock Ridge" is a ridge of zoolitic limestone the stretched from North Miami south to Florida City and the Everglades has been over developed because it was high ground. The threat of development continues not only with Coral Reef Commons, but Miami Wilds, a Universal Studios style theme / water park from 20th Century Fox and Sony.

I openly question why the Fish and Wildlife Service would even issue an Incidental Take Permit (ITP) to Ram Development to kill Endangered Species that FWS IS SUPPOSED TO BE PROTECTING IN THE FIRST PLACE! FWS historically has worked honorably and diligently to get these species on the Endangered Species List and to save them in the first place. To allow any Developer to cause the imminent extinction of any species because they want to put up another Walmart is beyond me. There are several other viable, non-Pine Rocklands, non-environmentally sensitive sites without endangered and threatened species living on it around Miami-Dade County that could be used if we really did need another Walmart.

I feel that I am uniquely qualified to comment on this HCP, not only because I am Vice President of the Miami Pine Rocklands Coalition, but that I am and have been on the Richmond Pine Rocklands nearly every weekend for the last three years. I volunteer at the Gold Coast Railroad Museum, less than 1,000 feet away from the southern border of the Coral Reef Commons property. I started volunteering at the Gold Coast to be able to keep an eye on my beloved Pine Rocklands, now I'm the Trainmaster and Yardmaster and I run the trains.

I want to make it clear to FWS, that I represent MYSELF in this matter. Not the Gold Coast Railroad Museum and not even the Miami Pine Rocklands Coalition, but simply myself. When I moved to the Deerwood area in 1990 I knew that most of the land around Metro Zoo was protected and in Local, State or Federal ownership. I never imagined that a Walmart would be put up right next to the Zoo Miami Main Entrance or a mega theme / water park would be put on the land either. I want to keep it that way and I expect FWS to do it.

There are so many valid reason for FWS to deny this HCP and deny Ram Development to build Coral Reef Commons regardless of plan, here is a Top 5.

- 1). Causing the extinction of one or more animal or plant species that require the Richmond Pine Rockland Habitat to survive.
- 2). Causing the continued destruction of original Pine Rockland and the Miami Rock Ridge.
- 3). Increased traffic on Coral Reef Drive, SW 152 Street, which currently handles 60,000 cars per day and with a Walmart and a Theme Park next to Zoo Miami, will easily add 30,000 more cars daily on a road than CANNOT be physically expanded or modified to handle it. It is the only street into or out of the area that currently is overburdened and there is no way to fix it.
- 4). Loss of Property Values for thousands of homeowners living in the Deerwood, Bonita Lakes, Three Lakes, and Richmond West areas.
- 5). Loss of Quality of Life for all citizens of Miami-Dade County. We have become a concrete jungle, we tear down the old but the new we put up is not always good. We desperately need more green space, to put it simply we need the trees. Losing even more trees and greenspace, especially Pine Rocklands is NOT a viable option.

While there are many reasons for FWC to deny the HCP and deny Coral Reef Commons to be built, there is only one reason to approve it. The ONE and ONLY reason to approve the HCP is the allow Peter Cummings and Ram Realty to make an obscene amount of money while destroying our unique South Florida Pine Rocklands ecosystem and causing Endangered and Threatened animal and plant species to become extinct.

I am counting on Fish and Wildlife Service to do the right thing, please do not let me and the rest of the citizens and endangered species of Miami-Dade County down.

Best Regards,

Paul Anthony

Associate Portfolio Manager

Bayview Loan Servicing, LLC

NMLS ID: 9061

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

f: 305.644.8143

[paulanthony@bayviewloanservicing.com](mailto:paulanthony@bayviewloanservicing.com)

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**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, March 27, 2017 7:18:22 AM

---

David Dell  
Southeast Region  
HCP and Safe Harbors Coordinator  
404/679-7313  
fax: 7081  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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**From:** r\_paul\_anthony [REDACTED]  
**Date:** Sat, Mar 25, 2017 at 9:43 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](mailto:david_dell@fws.gov)  
**Cc:** [ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov), [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)

Greetings FWS friends,

I am begging you to not approve this revised RAM development plan of the Coral Reef Commons. I was born and still reside in this area. My son and I used to enjoy nature runs and walks near and on this property. We were always under the assumption that the subject land was already protected by the county or neighboring Zoo. Later to shockingly find out that the University of Miami actually owned this land and sold it to the clutches of RAM development.

How can I justify proper conservation and "the RIGHT thing to do" to my son when he is witnessing another natural and furthermore endangered forest land be paved over and destroyed? My stomach turns just pondering this. To make matters worse the traffic in the area is already beyond unbearable. This or any other large scale development in this area would turn the already slug moving traffic similar into literally a standing parking lot.

PLEASE PLEASE PLEASE execute your powers to protect this endangered forest, endangered plants and animal species that reside there. Moreover, please produce an everlasting example of proper conservation and stewardship to our youth by "doing the RIGHT THING" by instilling a natural park.

Respectfully,

Paul Anthony

Sent from my T-MobileG LTE Device

**From:** [REDACTED]  
**To:** [david\\_dell@fws.gov](mailto:david_dell@fws.gov)  
**Cc:** [ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov); [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Fwd: Coral Reef Commons Draft Habitat Conservation Plan Agency/Docket Number: FWS-R4-ES-2016-N223 Document Number: 2017-05767  
**Date:** Tuesday, April 04, 2017 9:46:35 AM

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----- Original message -----

**From:** r\_paul\_anthony [REDACTED]  
**Date:** 03/25/2017 9:43 AM (GMT-05:00)  
**To:** [david\\_dell@fws.gov](mailto:david_dell@fws.gov)  
**Cc:** [ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov), [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Coral Reef Commons Draft Habitat Conservation Plan Agency/Docket Number: FWS-R4-ES-2016-N223 Document Number: 2017-05767

Greetings FWS friends,

I am begging you to not approve this revised RAM development plan of the Coral Reef Commons. I was born and still reside in this area. My son and I used to enjoy nature runs and walks near and on this property. We were always under the assumption that the subject land was already protected by the county or neighboring Zoo. Later to shockingly find out that the University of Miami actually owned this land and sold it to the clutches of RAM development.

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PLEASE PLEASE PLEASE execute your powers to protect this endangered forest, endangered plants and animal species that reside there. Moreover, please produce an everlasting example of proper conservation and stewardship to our youth by "doing the RIGHT THING" by instilling a natural park.

Respectfully,

R Paul Anthony  
[REDACTED]

Sent from my T-MobileG LTE Device

**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: Coral Reef Commons Project  
**Date:** Tuesday, March 28, 2017 6:59:27 AM

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**David Dell**  
**Southeast Region**  
**HCP and Safe Harbors Coordinator**  
**404/679-7313**  
**fax: 7081**  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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**From:** **Lynn Kupkee** [REDACTED]  
**Date:** Mon, Mar 27, 2017 at 10:12 PM  
**Subject:** Coral Reef Commons Project  
**To:** [David\\_dell@fws.gov](mailto:David_dell@fws.gov)

David Dell  
U.S. Fish and Wildlife Service U.S. Fish and Wildlife Service  
Atlanta Regional Office,  
1875 Century Blvd.  
Atlanta, GA 30345

[David\\_dell@fws.gov](mailto:David_dell@fws.gov)

Ashleigh Blackford  
South Florida Ecological Services  
1339 20th Street  
Vero Beach, FL 32960

[Ashleigh\\_Blackford@fws.gov](mailto:Ashleigh_Blackford@fws.gov)

Re: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.

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 longstanding 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.

We hope you will grant the public the opportunity to more fully discuss the impacts of Coral Reef Commons on federal and state endangered and threatened species through a public hearing. I look forward to your reply.

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.

Sincerely,

---

**Lynn Kupkee**  
**Sabal Chase Animal Clinic**



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**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: Correction of Error in Comment on the RAM Realty "Habitat Conservation Plan" (HCP) submitted February 2017  
**Date:** Tuesday, April 04, 2017 6:53:15 AM

---

David Dell  
Southeast Region  
HCP and Safe Harbors Coordinator  
404/679-7313  
fax: 7081  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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**From:** Jeff Dorsey [REDACTED]  
**Date:** Sat, Apr 1, 2017 at 9:08 AM  
**Subject:** Re: Correction of Error in Comment on the RAM Realty "Habitat Conservation Plan" (HCP) submitted February 2017  
**To:** Ashleigh Blackford <[ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov)>  
**Cc:** "[David\\_dell@fws.gov](mailto:David_dell@fws.gov)" <[David\\_dell@fws.gov](mailto:David_dell@fws.gov)>

Dear Ms. Blackford:

I found the following error in the comment I sent you a few days ago, which is corrected here.

With kind regards,

"introducing a systematic regime of controlled fire every 2-4 years [CORRECTION, should be: 3-7 years]  
(UF-IFAS, [http://solutionsforyourlife.ufl.edu/hot\\_topics/environment/fire\\_habitat.shtml](http://solutionsforyourlife.ufl.edu/hot_topics/environment/fire_habitat.shtml))"

Dr. Jeff Dorsey  
Agriculture, Business, Credit and Development LLC



---

**From:** Jeff Dorsey [REDACTED]  
**To:** Ashleigh Blackford <[ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov)>  
**Cc:** "[David\\_dell@fws.gov](mailto:David_dell@fws.gov)" <[David\\_dell@fws.gov](mailto:David_dell@fws.gov)>  
**Sent:** Wednesday, March 29, 2017 7:04 PM

**Subject:** Comment on the RAM Realty "Habitat Conservation Plan" (HCP) submitted February 2017

Dear Ms. Blackford:

My comments on this document are attached.

With input from the public and independent scientists, I'm sure that it will be possible to come up with a plan which really does conserve the Richmond pine rocklands that will then be acceptable to the FWS.

With kind regards,

Dr. Jeff Dorsey  
Agriculture, Business, Credit and Development LLC



**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: CRC-HCP Comment FWS-R4-ES-2016-N223  
**Date:** Monday, March 27, 2017 7:16:02 AM

---

David Dell  
Southeast Region  
HCP and Safe Harbors Coordinator  
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**From:** Al Sunshine Gmail [REDACTED] >  
**Date:** Fri, Mar 24, 2017 at 2:47 PM  
**Subject:** CRC-HCP Comment FWS-R4-ES-2016-N223  
**To:** [David\\_dell@fws.gov](mailto:David_dell@fws.gov), Ashleigh Blackford <[Ashleigh\\_Blackford@fws.gov](mailto:Ashleigh_Blackford@fws.gov)>, [REDACTED]

March 24, 2017

David Dell  
U.S. Fish and Wildlife Service U.S. Fish and Wildlife Service  
Atlanta Regional Office,  
1875 Century Blvd.  
Atlanta, GA 30345

Ashleigh Blackford  
South Florida Ecological Services  
1339 20th Street  
Vero Beach, FL 32960

**Re: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.**

Dear Mr. Dell and Ms. Blackford,

As a President of the Miami Pine Rocklands Coalition with more than 1000 members, 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: "Forums 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.

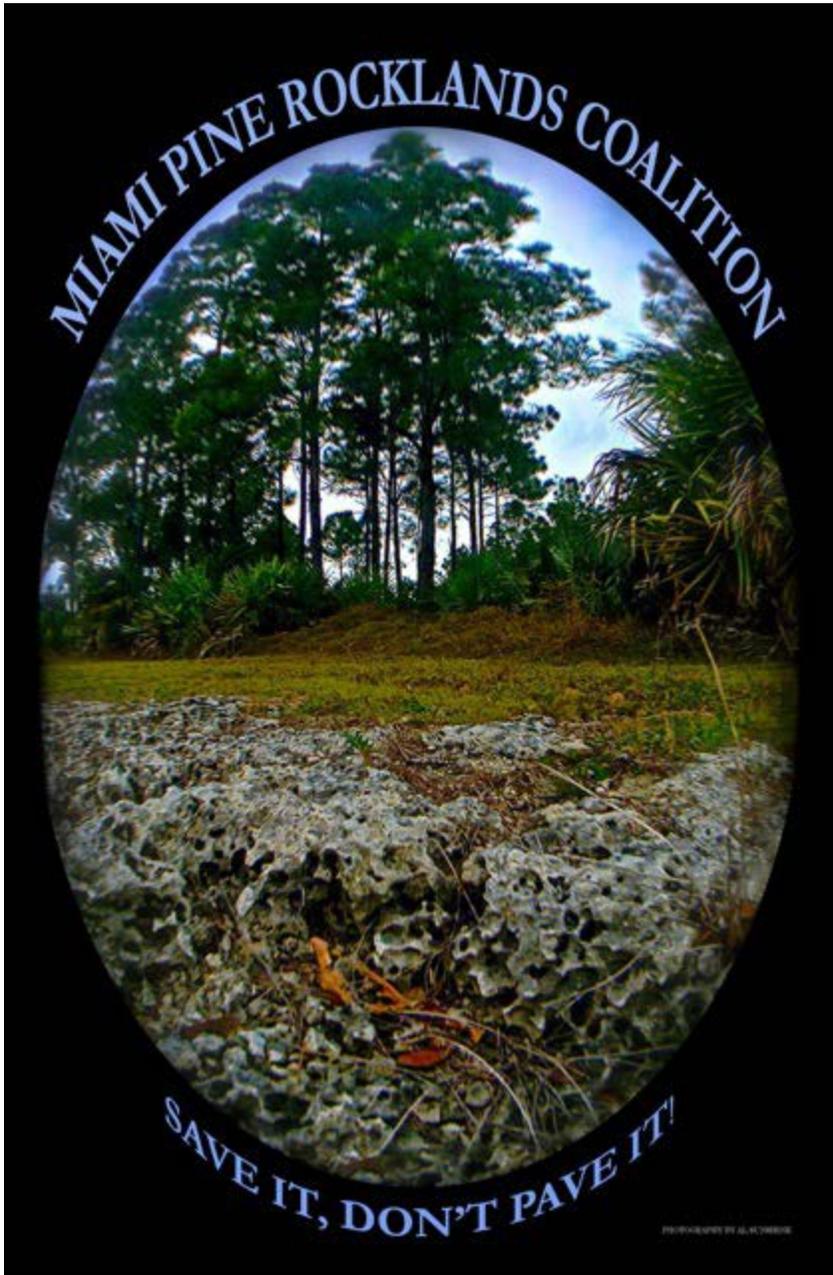
It is evident that a substantial environmental controversy concerning the proposed action and a substantial interest in holding the hearing exist.

We hope you will grant the public the opportunity to more fully discuss the impacts of Coral Reef Commons on federal and state endangered and threatened species through a public hearing. I look forward to your reply.

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.

Sincerely,

Al Sunshine  
President  
Miami Pine Rocklands Coalition  
Florida Non-Profit, 501(C) 3



**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: documents requested for [FWS-R4-ES-2016-N223]; [FXES11140400000-178-FF04E00000]  
**Date:** Monday, March 27, 2017 8:54:56 AM

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**David Dell**  
**Southeast Region**  
**HCP and Safe Harbors Coordinator**  
**404/679-7313**  
**fax: 7081**  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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**From:** **Jacki Lopez** [REDACTED]  
**Date:** Wed, Mar 22, 2017 at 11:05 AM  
**Subject:** documents requested for [FWS-R4-ES-2016-N223]; [FXES11140400000-178-FF04E00000]  
**To:** [david\\_dell@fws.gov](mailto:david_dell@fws.gov), [ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov)

Hello Mr. Dell and Ms. Blackford,

Please send me electronic copies or links to electronic copies to the draft Habitat Conservation Plan, Incidental Take Permit, and Environmental Assessment for the above referenced project (AKA Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL).

Thank you

---

Jaclyn Lopez | Florida Director, Staff Attorney

Center for Biological Diversity | [www.biologicaldiversity.org](http://www.biologicaldiversity.org)

[REDACTED]

[REDACTED]



**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: Fwd: Coral Reef Commons Draft Habitat Conservation Plan Agency/Docket Number: FWS-R4-ES-2016-N223 Document Number: 2017-05767  
**Date:** Friday, April 07, 2017 7:43:15 AM

---

David Dell  
Southeast Region  
HCP and Safe Harbors Coordinator  
404/679-7313  
fax: 7081  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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**From:** r\_paul\_anthony [REDACTED]  
**Date:** Tue, Apr 4, 2017 at 9:46 AM  
**Subject:** Fwd: Coral Reef Commons Draft Habitat Conservation Plan Agency/Docket Number: FWS-R4-ES-2016-N223 Document Number: 2017-05767  
**To:** [david\\_dell@fws.gov](mailto:david_dell@fws.gov)  
**Cc:** [ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov), [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)

----- Original message -----

**From:** r\_paul\_anthony [REDACTED]  
**Date:** 03/25/2017 9:43 AM (GMT-05:00)  
**To:** [david\\_dell@fws.gov](mailto:david_dell@fws.gov)  
**Cc:** [ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov), [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Coral Reef Commons Draft Habitat Conservation Plan Agency/Docket Number: FWS-R4-ES-2016-N223 Document Number: 2017-05767

Greetings FWS friends,

I am begging you to not approve this revised RAM development plan of the Coral Reef Commons. I was born and still reside in this area. My son and I used to enjoy nature runs and walks near and on this property. We were always under the assumption that the subject land was already protected by the county or neighboring Zoo. Later to shockingly find out that the University of Miami actually owned this land and sold it to the clutches of RAM development.

How can I justify proper conservation and "the RIGHT thing to do" to my son when he is witnessing another natural and furthermore endangered forest land be paved over and destroyed? My stomach turns just pondering this. To make matters worse the traffic in the area is already beyond unbearable. This or any other large scale development in this area would

turn the already slug moving traffic similar into literally a standing parking lot.

PLEASE PLEASE PLEASE execute your powers to protect this endangered forest, endangered plants and animal species that reside there. Moreover, please produce an everlasting example of proper conservation and stewardship to our youth by "doing the RIGHT THING" by instilling a natural park.

Respectfully,

R Paul Anthony



Sent from my T-MobileG LTE Device

**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: Miami Pine Rocklands - Coral Reef Commons  
**Date:** Tuesday, April 04, 2017 6:58:59 AM

---

**David Dell**  
**Southeast Region**  
**HCP and Safe Harbors Coordinator**  
**404/679-7313**  
**fax: 7081**  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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

**From:** **Jennifer Patti** [REDACTED]  
**Date:** Sun, Apr 2, 2017 at 10:05 PM  
**Subject:** Miami Pine Rocklands - Coral Reef Commons  
**To:** "[David\\_dell@fws.gov](mailto:David_dell@fws.gov)" <[David\\_dell@fws.gov](mailto:David_dell@fws.gov)>, "[Ashleigh\\_Blackford@fws.gov](mailto:Ashleigh_Blackford@fws.gov)" <[Ashleigh\\_Blackford@fws.gov](mailto:Ashleigh_Blackford@fws.gov)>

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 longstanding 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.

We hope you will grant the public the opportunity to more fully discuss the impacts of Coral Reef Commons on federal and state endangered and threatened species through a public hearing. I look forward to your reply.

In addition, I would 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.

Sincerely,

Jennifer Meizoso



**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: Miami Rocklands  
**Date:** Tuesday, April 04, 2017 7:11:25 AM

---

David Dell  
Southeast Region  
HCP and Safe Harbors Coordinator  
404/679-7313  
fax: 7081  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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

**From:** **Darlene Melcon** [REDACTED]  
**Date:** Mon, Apr 3, 2017 at 12:09 PM  
**Subject:** Miami Rocklands  
**To:** [David\\_dell@fws.gov](mailto:David_dell@fws.gov)

Sir: PLEASE do not allow some of the last remnants of wild South Florida to be given over to developers.

This is re FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL

Even if saving this pristine wild habitat is not enough reason, we who live in the area do not need more traffic on the already over-crowded and horrendous SW 152 St or Coral Reef Dr, as it is known by both.

Miami-Dade County is already over-built; every major road and highway is lined with shops and malls.....and any photo of this area will showcase the huge high rises we have everywhere. There are spaces available on said roads where more buildings would just be accepted.

Please do not allow this to happen.

Sincerely,  
Darlene Melcon



**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: No Walmart on 152st  
**Date:** Thursday, March 30, 2017 7:00:17 AM

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**David Dell**  
**Southeast Region**  
**HCP and Safe Harbors Coordinator**  
**404/679-7313**  
**fax: 7081**  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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

**From: Robert Valido Prestige Marine** [REDACTED]  
**Date:** Wed, Mar 29, 2017 at 6:29 PM  
**Subject:** No Walmart on 152st  
**To:** [David\\_dell@fws.gov](mailto:David_dell@fws.gov)

Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.

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

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I have a longstanding 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.

We hope you will grant the public the opportunity to more fully discuss the impacts of Coral Reef Commons on federal and state endangered and threatened species through a public hearing. I look forward to your reply.

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.

Sincerely,

Sent from my iPhone

**From:** [Dell, David](#)  
**To:** [FW4\\_CRC\\_HCP](#)  
**Subject:** Fwd: PUBLIC COMMENT ON FEDERAL REGISTER THIS BUDILING SHOULD NOT BE PERMITTED - FLA IS SINKING  
**Date:** Monday, March 27, 2017 8:32:54 AM

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David Dell  
Southeast Region  
HCP and Safe Harbors Coordinator  
404/679-7313  
fax: 7081  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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

**From:** Jean Public [REDACTED]  
**Date:** Thu, Mar 23, 2017 at 3:14 PM  
**Subject:** Re: PUBLIC COMMENT ON FEDERAL REGISTER THIS BUDILING SHOULD NOT BE PERMITTED - FLA IS SINKING  
**To:** [REDACTED]

THIS PROPOSAL SHOULD BE DENIED COMPLETELY. ALL OF FLIRIDA IS SINKING SO ALLOWING THIS ENDLES BUILDING MAKES NO SENSE AT ALL. IN ADDITION THE SITE IS LOADED WITH HUNDREDS OF ENDANGERED ANIMALS THAT RELY ON THIS LAND FOR THEIR HOME. THAT SHOULD BE RESPECTED. THERE IS ABSOLUTELY NO REASON TO ALLOW A PROFITEER TO COME IN THERE AND DESTROY ALL THOSE LANDS FOR LIFE IN AMERICA. THE BUTTERFIES ARE ALL VANISHING FROM EARTH, THE BATS, THE MANY MANY PLANTS THAT WERE LISTED. THEY CANNOT EXIST ON JUST PART OF THEIR FORMER LAND. IF THEY COULD THEY WOULD HAVE ALL CLUSTERED THERE BEFORE. THIS PLAN TAKES AWAY THE LAND THEY NEED TO LIVE ON. THIS PLAN SHOULD BE TOTALLY AND COMPLETELY REJECTED AS HARMFUL TO ALL LIFE IN AMERICA. THIS COMMENT IS FOR THE PUBLIC RECORD. PLEASE RECEIPT. JEAN PUBLIEE [REDACTED], PLEASE RESPOND BY EMAIL. THANK YOU.

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[Federal Register Volume 82, Number 55 (Thursday, March 23, 2017)]  
[Notices]  
[Pages 14908-14910]  
From the Federal Register Online via the Government Publishing Office [[www.gpo.gov](http://www.gpo.gov)]  
[FR Doc No: 2017-05767]

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DEPARTMENT OF THE INTERIOR

Fish and Wildlife Service

[FWS-R4-ES-2016-N223]; [FXES11140400000-178-FF04E00000]

Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL

AGENCY: Fish and Wildlife Service, Interior.

ACTION: Notice of availability; request for comments.

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SUMMARY: Under the Endangered Species Act of 1973, as amended (Act),

[[Page 14909]]

we, the U.S. Fish and Wildlife Service, announce the receipt and availability of a proposed habitat conservation plan and accompanying documents related to an application from four applicants for a permit associated with construction of the Coral Reef Commons mixed-use development (project) in Miami-Dade County, Florida. If issued, the permit would authorize take of three federally listed species, one Federal candidate, and two State-listed species, incidental to project development, occupation, and use. We invite the public to comment on these documents.

DATES: To ensure consideration, please send your written comments by May 22, 2017.

ADDRESSES: Obtaining Documents: Documents are available for public inspection by appointment during regular business hours at either of the following locations:

Atlanta Regional Office, Ecological Services, U.S. Fish and Wildlife Service, 1875 Century Boulevard, Atlanta, GA 30345.

South Florida Ecological Services Office, U.S. Fish and Wildlife Service, 1339 20th Street, Vero Beach, FL 32960.

Submitting Comments: Submit comments by one of the following methods. Please reference TE15009C-0 in all comments. For additional guidance, please see Public Comments under SUPPLEMENTARY INFORMATION.

U.S. mail: You may mail comments to the Fish and Wildlife Service's Atlanta Regional Office.

Hand-delivery: You may hand-deliver comments to the Atlanta or the Vero Beach Office.

Email: You may email comments to [david\\_dell@fws.gov](mailto:david_dell@fws.gov). Please include your name and return address in your email message. If you do not receive a confirmation from us that we have received your email message, contact us directly at either telephone number in FOR FURTHER INFORMATION CONTACT.

FOR FURTHER INFORMATION CONTACT: Mr. David Dell, Regional HCP Coordinator, Atlanta (see ADDRESSES), telephone: 404-679-7313; or Ashleigh Blackford, Supervisory Wildlife Biologist, at the South Florida Ecological Services Office (see ADDRESSES), telephone: 772-469-4246. If you use a telecommunications device for the deaf (TDD), please call the Federal Relay Service at 800-877-8339.

SUPPLEMENTARY INFORMATION: Under the Endangered Species Act of 1973, as amended (Act), we, the U.S. Fish and Wildlife Service, announce the receipt and availability of a proposed habitat conservation plan (HCP), accompanying incidental take permit (ITP) application, and environmental assessment (EA) related to an application from Coral Reef Retail LLC, Coral Reef Residential Phase I LLC, Ramdev LLC, and the University of Miami (applicants) for a permit associated with construction of the Coral Reef Commons mixed-use development (project) in Miami-Dade County, Florida. We invite the public to comment on these documents.

The applicants' proposed HCP describes the mitigation and minimization measures proposed to address the impacts to the covered species. Per the National Environmental Policy Act (42 U.S.C. 4321 et

seq.; NEPA), the EA analyzes the take of the covered species and the environment. The applicants request a 30-year ITP under section 10(a)(1)(B) of the Act, as amended (16 U.S.C. 1531 et seq.).

#### Covered Species

The covered species are the following:

Federally listed as endangered: Bartram's scrub-hairstreak butterfly (*Strymon acis bartrami*), Florida leafwing butterfly (*Anaea troglodyta floridalis*), Florida bonneted bat (*Eumops floridanus*), and Miami tiger beetle (*Cicindela scabrosa floridana*).

Federally listed as threatened: Eastern indigo snake (*Drymarchon corais cooperi*).

Federal candidate: Gopher tortoise (*Gopherus polyphemus*).

State-listed: Rim rock crowned snake (*Tantilla oolitica*) and white-crowned pigeon (*Patagioenas leucocephala*).

Because the project would likely have adverse effects on several plant species, the HCP includes conservation measures for the following plant species:

Federally listed as endangered: Tiny polygala (*Polygala smallii*), deltoid spurge (*Chamaesyce deltoidea*), crenulate lead-plant (*Amorpha crenulata*), Florida brickell bush (*Brickelia mosieri*), Small's milkpea (*Galactia smallii*), and Carter's small-flowered flax (*Linum carteri* var. *carteri*).

Federally listed as threatened: Garber's spurge (*Chamaesyce garberi*).

Federal candidates: Sand flax (*Linum arenicola*), Blodgett's silver bush (*Argythamnia blodgettii*), Florida prairie clover (*Dalea carthagenensis* var. *floridana*), Florida pineland crabgrass (*Digitaria pauciflora*), Everglades bully (*Sideroxylon reclinatum* ssp. *austrofloridense*), and Florida bristle fern (*Trichomanes punctatum* ssp. *floridanum*).

State-listed: Clamshell orchid (*Encyclia cochleata* var. *triandra*).

#### Environmental Assessment

The EA assesses the likely environmental impacts associated with the project, including the environmental consequences of the no-action and the proposed action alternatives. The proposed action alternative is issuance of the ITP and implementation of the HCP as submitted by the applicants. The HCP area is comprised of a 137.9-acre tract, of which 86.49 acres are proposed for development, in addition to a

separate 50.96-acre tract proposed for off-site mitigation. These tracts lie in an area known as the Richmond Pine Rocklands. Construction of the project would impact 86.49 acres of pine rockland habitat and would take covered species that occupy the area.

#### Habitat Conservation Plan

The minimization and mitigation measures proposed in the HCP include the setting aside and maintenance of 51.41 acres of conservation areas within the 137.9-acre tract, supplemented by 3.88 acres of intermediate conservation ``stepping stones'' to provide for movement of covered species among the conservation areas. In addition to the conservation areas, the 50.96-acre tract would serve as off-site mitigation and be protected and maintained as habitat for the covered species. The conservation and off-site mitigation areas would be managed by prescribed fire, other vegetation control measures, and removal of exotic invasive species. The areas also would be protected, as appropriate, by association covenants, deed restrictions, and/or conservation easements.

#### Public Comments

We specifically request information, views, and opinions from the public on our proposed Federal action, including identification of any other aspects of or impacts to the human environment not already identified in the EA prepared pursuant to the NEPA regulations at 40 CFR 1506.6. Further, we specifically solicit information regarding the adequacy of the HCP per 50 CFR parts 13 and 17.

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment--including your personal identifying information--may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

[[Page 14910]]

#### Covered Area

The covered species historically occurred in the Richmond pine rockland habitats. Portions of the HCP covered area consist of

pine  
rockland habitat that is either currently occupied by the  
covered  
species or suitable for restoration as habitat for the species.

#### Next Steps

We will evaluate the ITP application, including the HCP, and  
any  
comments we receive to determine whether the application meets  
the  
requirements of section 10(a)(1)(B) of the Act. We will also  
evaluate  
whether a section 10(a)(1)(B) ITP should be issued, as well as  
conduct  
an intra-Service consultation pursuant to section 7 of the Act.  
We will  
use the results of this consultation and the above findings in  
our  
final analysis to determine whether to issue the ITP. If we  
determine  
that the requirements are met, we will issue the ITP for  
incidental  
take of the covered species.

#### Authority

We provide this notice under section 10 of the Act (16  
U.S.C. 1531  
et seq.) and NEPA regulations (40 CFR 1506.6).

Dated: March 3, 2017.  
Mike Oetker,  
Acting Regional Director.  
[FR Doc. 2017-05767 Filed 3-22-17; 8:45 am]  
BILLING CODE 4333-15-P

**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.  
**Date:** Friday, April 07, 2017 7:01:56 AM

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**David Dell**  
**Southeast Region**  
**HCP and Safe Harbors Coordinator**  
**404/679-7313**  
**fax: 7081**  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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

**From:** RayH [REDACTED]  
**Date:** Thu, Apr 6, 2017 at 6:40 PM  
**Subject:** Re: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.  
**To:** [Ashleigh\\_Blackford@fws.gov](mailto:Ashleigh_Blackford@fws.gov), [David\\_dell@fws.gov](mailto:David_dell@fws.gov), [REDACTED]

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.

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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.

We hope you will grant the public the opportunity to more fully discuss the impacts of Coral Reef Commons on federal and state endangered and threatened species through a public hearing. I look forward to your reply.

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.

Sincerely,

Raymond Henderson

[REDACTED]

[REDACTED]

**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.  
**Date:** Thursday, April 06, 2017 12:29:29 PM

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**David Dell**  
**Southeast Region**  
**HCP and Safe Harbors Coordinator**  
**404/679-7313**  
**fax: 7081**  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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

**From:** **Darlene Melcon** [REDACTED]  
**Date:** Thu, Apr 6, 2017 at 12:19 PM  
**Subject:** Re: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.  
**To:** [David\\_dell@fws.gov](mailto:David_dell@fws.gov), [Ashleigh\\_Blackford@fws.gov](mailto:Ashleigh_Blackford@fws.gov)

Re: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.

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.

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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.

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We hope you will grant the public the opportunity to more fully discuss the impacts of Coral Reef Commons on federal and state endangered and threatened species through a public hearing. I look forward to your reply.

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.

Sincerely,

Darlene Melcon

[REDACTED]

[REDACTED]

**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request  
**Date:** Tuesday, April 04, 2017 7:07:31 AM

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**David Dell**  
**Southeast Region**  
**HCP and Safe Harbors Coordinator**  
**404/679-7313**  
**fax: 7081**  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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

**From:** **Ty Shlackman** [REDACTED]  
**Date:** Mon, Apr 3, 2017 at 11:40 AM  
**Subject:** Re: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request  
**To:** [David\\_dell@fws.gov](mailto:David_dell@fws.gov), [Ashleigh\\_Blackford@fws.gov](mailto:Ashleigh_Blackford@fws.gov)

April 3, 2017

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.

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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.

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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.

We hope you will grant the public the opportunity to more fully discuss the impacts of Coral Reef Commons on federal and state endangered and threatened species through a public hearing. I look forward to your reply.

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.

Sincerely,

Ty Shlackman

**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: Request for Local Public Hearing on FWS-R4-ES-2016-N223  
**Date:** Monday, March 27, 2017 7:13:02 AM

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**David Dell**  
**Southeast Region**  
**HCP and Safe Harbors Coordinator**  
**404/679-7313**  
**fax: 7081**  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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

**From:** **Carolina V.** [REDACTED]  
**Date:** Sat, Mar 25, 2017 at 12:30 AM  
**Subject:** Request for Local Public Hearing on FWS-R4-ES-2016-N223  
**To:** [David\\_dell@fws.gov](mailto:David_dell@fws.gov), [Ashleigh\\_Blackford@fws.gov](mailto:Ashleigh_Blackford@fws.gov)

**Re: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.**

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.

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Sincerely,

**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.  
**Date:** Monday, March 27, 2017 7:09:23 AM

---

David Dell  
Southeast Region  
HCP and Safe Harbors Coordinator  
404/679-7313  
fax: 7081  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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

**From:** SabalChase Vet [REDACTED]  
**Date:** Fri, Mar 24, 2017 at 8:28 PM  
**Subject:** Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.  
**To:** [David\\_dell@fws.gov](mailto:David_dell@fws.gov)

March 24, 2017

David Dell  
U.S. Fish and Wildlife Service U.S. Fish and Wildlife Service  
Atlanta Regional Office,  
1875 Century Blvd.  
Atlanta, GA 30345  
[David\\_dell@fws.gov](mailto:David_dell@fws.gov)

**Re: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.**

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Sincerely,

Ian Bruce Kupkee DVM

[REDACTED]

[REDACTED]

**From:** [Ashleigh Blackford](#)  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Fwd: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.  
**Date:** Friday, April 07, 2017 7:54:09 AM

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ashleigh

Please excuse typos, Sent from my iPhone, which is sometimes not as smart as it thinks it is.

Begin forwarded message:

**From:** RayH [REDACTED]  
**Date:** April 6, 2017 at 6:40:13 PM EDT  
**To:** <[Ashleigh.Blackford@fws.gov](mailto:Ashleigh.Blackford@fws.gov)>, <[David\\_dell@fws.gov](mailto:David_dell@fws.gov)>, [REDACTED]  
**Subject:** **Re: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.**

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Sincerely,

Raymond Henderson

[REDACTED]

[REDACTED]

**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: Request for Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL  
**Date:** Monday, March 27, 2017 7:04:43 AM  
**Attachments:** [2017\\_03\\_24 request for public hearing FWS-R4-ES-2016-N223.pdf](#)

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David Dell  
Southeast Region  
HCP and Safe Harbors Coordinator  
404/679-7313  
fax: 7081  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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**From:** Jacki Lopez [REDACTED]  
**Date:** Fri, Mar 24, 2017 at 4:04 PM  
**Subject:** Request for Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL  
**To:** "Dell, David" <[david\\_dell@fws.gov](mailto:david_dell@fws.gov)>, Ashleigh Blackford <[ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov)>  
**Cc:** Sandy Koi <[\[REDACTED\]@fws.gov](mailto:[REDACTED]@fws.gov)>, Dennis Olle <[\[REDACTED\]@fws.gov](mailto:[REDACTED]@fws.gov)>, Erin Clancy <[\[REDACTED\]@fws.gov](mailto:[REDACTED]@fws.gov)>, Matthew Schwartz <[\[REDACTED\]@fws.gov](mailto:[REDACTED]@fws.gov)>, Al Sunshine Gmail <[\[REDACTED\]@gmail.com](mailto:[REDACTED]@gmail.com)>

Greetings,

The Center for Biological Diversity, Tropical Audubon Society, South Florida Wildlands Association, North American Butterfly Association, Miami Pine Rocklands Coalition, and The Institute for Regional Conservation, and our thousands of members in south Florida, 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.

The attached letter details the reasons supporting the request.

Please let me know if you have any questions. We look forward to your prompt reply.

Thank you,

---

Jaclyn Lopez | Florida Director, Staff Attorney

Center for Biological Diversity | [www.biologicaldiversity.org](http://www.biologicaldiversity.org)

[Redacted]

[Redacted]

**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: Request for Public Hearing on FWS-R4-ES-2016-N223  
**Date:** Thursday, March 30, 2017 6:59:04 AM

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David Dell  
Southeast Region  
HCP and Safe Harbors Coordinator  
404/679-7313  
fax: 7081  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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**From:** Cully Waggoner [REDACTED]  
**Date:** Wed, Mar 29, 2017 at 6:03 PM  
**Subject:** Request for Public Hearing on FWS-R4-ES-2016-N223  
**To:** [david\\_dell@fws.gov](mailto:david_dell@fws.gov), Ashleigh Blackford FWS <[ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov)>, [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)

March 28, 2017

David Dell  
U.S. Fish and Wildlife Service  
Atlanta Regional Office, Ecological Services  
1875 Century Blvd.  
Atlanta, GA 30345  
[David\\_dell@fws.gov](mailto:David_dell@fws.gov)

Ashleigh Blackford  
U.S. Fish and Wildlife Service  
South Florida Ecological Services

1339 20th St.

Vero Beach, FL 32960

[Ashleigh.Blackford@fws.gov](mailto:Ashleigh.Blackford@fws.gov)

**Re:** Request for Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.

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.

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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 longstanding 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.

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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 the FWS.

Sincerely,

--



**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: Reuest for Local Public Hearing on FWS-R4-ES-2016-N223  
**Date:** Monday, March 27, 2017 7:21:41 AM  
**Attachments:** [Request for local public hearing.doc](#)

---

David Dell  
Southeast Region  
HCP and Safe Harbors Coordinator  
404/679-7313  
fax: 7081  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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

**From:** Maria V. Flores <[lucylut42@aol.com](mailto:lucylut42@aol.com)>  
**Date:** Sat, Mar 25, 2017 at 8:50 PM  
**Subject:** Reuest for Local Public Hearing on FWS-R4-ES-2016-N223  
**To:** [David\\_dell@fws.gov](mailto:David_dell@fws.gov)

**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: Rocklands  
**Date:** Tuesday, March 28, 2017 12:37:47 PM

---

**David Dell**  
**Southeast Region**  
**HCP and Safe Harbors Coordinator**  
**404/679-7313**  
**fax: 7081**  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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----- Forwarded message -----  
**From: Stephanie Brovold** [REDACTED] >  
**Date:** Tue, Mar 28, 2017 at 11:43 AM  
**Subject:** Rocklands  
**To:** "[David\\_dell@fws.gov](mailto:David_dell@fws.gov)" <[David\\_dell@fws.gov](mailto:David_dell@fws.gov)>

David Dell

U.S. Fish and Wildlife Service Atlanta Regional Office,  
1875 Century Blvd.  
Atlanta, GA 30345

[David\\_dell@fws.gov](mailto:David_dell@fws.gov)

Ashleigh Blackford  
U.S. Fish and Wildlife Service U.S. Ecological Services South Florida Ecological Services  
1339 20th St.  
Vero Beach, FL 32960

[Ashleigh\\_Blackford@fws.gov](mailto:Ashleigh_Blackford@fws.gov)

Here's a copy of a recent letter you can print out or email to demand the Public's Voice be heard on this critical environmental issue:

Sent via Email and Certified Mail Return Receipt

March 24, 2017

Re: Request for Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.

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.[3] 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.[4] 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.[5] This important community provides vital habitat for many endangered species, including those at issue in this permit application.[6]

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I have a longstanding 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.

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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.[11] Many concerned residents appear to oppose the project and would benefit from the opportunity to attend a public hearing on the application.[12]

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

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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 the FWS.

Sincerely,

**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd: URGENT  
**Date:** Monday, March 27, 2017 7:25:59 AM

---

David Dell  
Southeast Region  
HCP and Safe Harbors Coordinator  
404/679-7313  
fax: 7081  
[david\\_dell@fws.gov](mailto: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:** Dawn Gmail Acct [REDACTED] >  
**Date:** Mon, Mar 27, 2017 at 5:24 AM  
**Subject:** URGENT  
**To:** [David\\_dell@fws.gov](mailto:David_dell@fws.gov), [Ashleigh\\_Blackford@fws.gov](mailto:Ashleigh_Blackford@fws.gov)

March 24, 2017  
David Dell  
U.S. Fish and Wildlife Service U.S. Fish and Wildlife Service  
Atlanta Regional Office,  
1875 Century Blvd.  
Atlanta, GA 30345

Ashleigh Blackford  
South Florida Ecological Services  
1339 20th Street  
Vero Beach, FL 32960

Re: Request for Local Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.

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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.

Sincerely,

Dawn martinez

**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Fwd:  
**Date:** Monday, March 27, 2017 7:25:18 AM

---

David Dell  
Southeast Region  
HCP and Safe Harbors Coordinator  
404/679-7313  
fax: 7081  
[david\\_dell@fws.gov](mailto:david_dell@fws.gov)

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

**From:** sebas mor [REDACTED]  
**Date:** Sun, Mar 26, 2017 at 12:10 PM  
**Subject:**  
**To:** [david\\_dell@fws.gov](mailto:david_dell@fws.gov)  
**Cc:** [ashleigh\\_blackford@fws.gov](mailto:ashleigh_blackford@fws.gov)

Sent from my iPhone

Hello FWS

I was informed that you guys were going to build a Walmart near my home, and I am very furious to hear that because you guys aren't just building a Walmart that will cause a massive amount of traffic, but your also going to build it in the pine rock land forest where im sure you know that it has endangered animals and endangered plants,I am asking on behalf of everybody that lives around there to not build it, I go to school in the morning and theirs a lot of traffic as it is already,and if theirs more,the number of crashes around there will increase, wich is not good as you may know. Money helps us live well, but plants and trees are essential to live.

**From:** [REDACTED]  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** In opposition of the Walmart Development scheduled to start on Pinerockland  
**Date:** Sunday, April 02, 2017 11:38:33 AM

---

To whom It May Concern,

I am writing in complete opposition of the proposed Walmart Development scheduled to take place on Pinerockland Habitats in Miami, FL, specifically at 127th avenue and 152nd Street.

Miami residents do not need, nor do we want another development. The lands should not be altered in any way. As citizens of this beautiful landscape, so much has already been destroyed at the hands of developers. Please stand with us against this horrific proposal.

Cheers,

Danielle Bender

[REDACTED]

**From:** [REDACTED]  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Oppose the building of Walmart and Townhomes for Coral Reef Commons  
**Date:** Wednesday, March 29, 2017 12:28:22 PM

---

To Whom It May Concern,

I am writing to oppose the building of a Walmart and 900 townhouses at the sight surrounding ZooMiami. That area which is habitat for **Bartram's scrub-hairstreak butterfly**, Florida leafwing butterfly, Florida bonneted bat, eastern indigo snake, rim rock crowned snake, gopher tortoise, Miami tiger beetle and white-crowned pigeon. These species are incredibly valuable and this area should be made into a nature reserve rather than townhouse development. Florida possesses so many amazing natural resources and this area needs to be preserved. Please do not allow this horrible development to take place.

Thank you,

Nikki Traylor-Knowles

--

**Nikki Traylor-Knowles, Ph.D.**

\*\*\*\*\*

Assistant Professor  
Department of Marine Biology and Ecology  
Rosenstiel School of Marine and Atmospheric Science  
University of Miami

[REDACTED]

[REDACTED]

[REDACTED]

**From:** [REDACTED]  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Pine Rockland Development  
**Date:** Saturday, April 01, 2017 11:14:53 PM

---

To Whom it May Concern,

I'm writing to express my deep concern that a Walmart is already planning to be built on the scarce amount of nature we have left in Miami. This violates animals habitats, some of which are endangered and nature benefits all residents of miami. There are plenty of other places a large corporation like Walmart could develop on. As a resident of Miami, a taxpayer, and a lifetime Florida native I am against this we need to protect the natural habitats we have.

Sincerely,  
Julie Fliegenspan

**From:** [REDACTED]  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Pine Rockland habitat Walmart  
**Date:** Saturday, April 01, 2017 5:45:37 AM

---

To whom it may concern:

Please say no to the development being proposed. Our Wverglades and other wild areas are vastly more valuable then yet another soulless strip mall.

Once those natural areas are gone, they're gone for good. We cannot let that happen in pursuit of money.

Thank you.

Dana Hoffman

[REDACTED]

**From:** [REDACTED]  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Pine Rocklands and Potential Developments  
**Date:** Sunday, April 02, 2017 8:17:30 PM

---

To whom it may concern,

The Pine Rocklands is a nearly extinct habitat, and if we choose to destroy what little we have left in Miami, we will not be getting it back. This land should not be used for development, especially of a company as notorious and unhealthy for our community as Wal-Mart. There have been many protests of this rash and destructive development, speaking to the will of the people to save this icon of the Florida environment. Please deny requests to damage and develop on the habitat on this property.

Thanks for your time,  
Evan Morrison  
University of Miami

**From:** [REDACTED]  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Pine Rocklands  
**Date:** Thursday, March 23, 2017 7:35:02 AM

---

The commercial development of this property will destroy endangered species. Coral Reef Drive is already so congested it takes 15 minutes to drive 1 mile, not during rush hour. We will be worse prisoners in our homes. We don't need a Walmart in our community. The restaurants in this area are not filled with customers. Why need more restaurants? Or more cars to turn 152 St into a more congested parking lot?

Sent from my iPhone

**From:** [REDACTED]  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Please do not allow any development of our remaining Pine Rocklands  
**Date:** Thursday, April 06, 2017 11:07:48 AM

---

Please do not allow any development of our remaining Pine Rocklands. This is an issue on which too much compromise has already been made. There are just 2% remaining and it is disturbing that allowing that to drop any further is even being considered.

Miami, despite existing between the Florida Reef and the Everglades, is overlooked as a place of any value in the eyes of people who appreciate nature, and part of that is because of actions like this. Because we as a community don't bother to protect it, and because when we do, when we speak out, we are ignored. The wallets of developers and corporations from afar are appreciated far more than the voices of locals who would be affected by this.

We do not want this Walmart. We do not want the low paying jobs it will bring, we do not want the traffic and congestion, and we do not want the urban sprawl that it will help worsen. We know urban sprawl is bad for us, for our communities, for our health.

We do want these Pine Rocklands. We know time in nature, the air cleaning affects of trees, even the mere presence of trees is good for us physically and mentally. We want this habitat of tremendous biodiversity, of wildlife and plants unique to Miami. This is far too special and too rare to allow to be developed. We have compromised so much already and we are no better for it. In fact, we are worse. Saving a tiny chunk and allowing the rest to be developed will do nothing to mitigate the impact.

Please consider the importance of this ecosystem and the voice of the people who will be affected by this.

Thank you,  
Dylann Turffs

**From:** [REDACTED]  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Please don't develop globally imperiled Pine Rocklands in Miami  
**Date:** Thursday, March 23, 2017 8:47:05 AM

---

Hello! I strongly OPPOSE the further development of our globally imperiled Pine Rocklands in Miami. The remaining fragments of this ecosystem are so incredible special and necessary for the wildlife that depends on it.

Just because Miami was born out of this upland environment with mostly all the Miami Dade slash pine logged, doesn't mean we should continue to obliterate it! It is essential these plants and animals have habitat to survive off.

I'm begging you to consider to services these ecosystems brings to the community and world. Money is NOT as important. The children and people of the present and future need these very small remaining fragments of Pine Rocklands to know what was before and what is natural. What is truly important.

Sincerely,  
Miami native  
Sanna O'Sullivan

**From:** [REDACTED]  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Please No !  
**Date:** Sunday, April 02, 2017 2:56:04 PM

---

Do not allow further development in the Coral Reef area ! The traffic now is horrendous and our natural spaces are dwindling. We need nature !

Paula Baxter

**From:** [REDACTED]  
**To:** [david\\_dell@fws.gov](mailto:david_dell@fws.gov); [Ashleigh Blackford FWS](mailto:Ashleigh.Blackford@fws.gov); [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Request for Public Hearing on FWS-R4-ES-2016-N223  
**Date:** Wednesday, March 29, 2017 6:03:25 PM

---

March 28, 2017

David Dell

U.S. Fish and Wildlife Service

Atlanta Regional Office, Ecological Services

1875 Century Blvd.

Atlanta, GA 30345

[David\\_dell@fws.gov](mailto:David_dell@fws.gov)

Ashleigh Blackford

U.S. Fish and Wildlife Service

South Florida Ecological Services

1339 20th St.

Vero Beach, FL 32960

[Ashleigh.Blackford@fws.gov](mailto:Ashleigh.Blackford@fws.gov)

**Re:** Request for Public Hearing on FWS-R4-ES-2016-N223, Endangered and Threatened Wildlife and Plants; Incidental Take Permit Application and Environmental Assessment for Commercial Mixed-Use Development; Miami-Dade County, FL and 90 Day Public Comment Request.

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Sincerely,

--

*Cully Waggoner*  
Vice President, Miami Pine Rocklands Coalition

**Personal:**

[REDACTED]

**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Scan of Public hearing Request  
**Date:** Thursday, March 30, 2017 3:03:00 PM  
**Attachments:** [Kupkee request hearing.pdf](#)

---

David Dell  
Southeast Region  
HCP and Safe Harbors Coordinator  
404/679-7313  
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**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Scanned Comments Anthony  
**Date:** Thursday, April 06, 2017 9:05:28 AM  
**Attachments:** [Anthony comments.pdf](#)

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**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Scanned Comments: Meizoso  
**Date:** Thursday, March 30, 2017 7:59:05 AM  
**Attachments:** [Meizoso comments.pdf](#)

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**From:** [Dell, David](#)  
**To:** [FW4 CRC\\_HCP](#)  
**Subject:** Scanned Request for Hearing: Meizoso  
**Date:** Thursday, March 30, 2017 7:59:49 AM  
**Attachments:** [Meizoso request hearing.pdf](#)

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**From:** [REDACTED]  
**To:** [Ashleigh.Blackford@fws.gov](mailto:Ashleigh.Blackford@fws.gov); [CRC\\_hcp@fws.gov](mailto:CRC_hcp@fws.gov); [David\\_dell@fws.gov](mailto:David_dell@fws.gov)  
**Subject:** Subject: Coral Reef Commons Draft Habitat Conservation Plan Agency/Docket Number: FWS-R4-ES-2016-N223  
Document Number: 2017-05767  
**Date:** Sunday, April 02, 2017 6:56:48 PM

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**Amazing that in 2017 the public still needs to write FWS to explain why is it important to preserve some of the last vestiges of pinelands in Dade County and keep it from turning into yet another Walmart and dime a dozen shops and restaurants.**

One reason to preserve the area is to protect the gene pool for these threatened plants.

Fernando de Aragon  
Ithaca, NY

**From:** [REDACTED]  
**To:** [crc\\_hcp@fws.gov](mailto:crc_hcp@fws.gov)  
**Subject:** Wal-Mart  
**Date:** Friday, April 07, 2017 8:20:33 AM

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Don't do it