

Ms. Ashleigh Blackford
US Fish and Wildlife Service
South Florida Ecological Services
1339 20th St.
Vero Beach, FL 39260

Miami, March 29, 2017

Dear Ms. Blackford:

About a year ago, you were kind enough to return my call and to discuss at length some of the issues surrounding the proposals to commercially develop parts of the Richmond pine rocklands tract surrounding Miami's MetroZoo. These issues have reemerged with the submission of RAM Realty's Draft Habitat Conservation Plan dated February 2017 for an area which it calls Coral Reef Commons.

The Draft Habitat Conservation Plan recently submitted by RAM Realty of Palm Beach is part of a fragmented piecemeal process which favors the development for private gain of property which even in its sadly neglected current state benefits the broader population of South Miami. This approval process allows incremental approvals of individual projects - even megaprojects like this RAM's and its sister project FOX's Miami Wilds and the many other developments occurring in the same general area - to be obtained without ever stepping back and answering the question: does this project (and related projects) improve the quality of life of the population of the County, of the people who live around the MetroZoo area and who currently enjoy the use of SW 152nd St, SW 137th Avenue and the Florida Turnpike from SW 152nd St. and to the south? Were those affected by this project and similar projects consulted, their answer would be a resounding "No."

To call this private encroachment on the greenspace around the Zoo a "Commons" is an affront to John R. Commons the father of institutional economics and to anyone who has studied the "Tragedy of the Commons." RAM's private commercial development if allowed will destroy the last significant intact green space in South Miami which already is a "commons". RAM's proposal is in fact the enclosure of a public commons for private gain. The parking lot opposite the Zoo did serve as a commons, a meeting point for the exchange of ideas where the Miami Pine Rockland Coalition held one of its first meetings to bring together people who want this habitat preserved. Walmart and the other corporations planning to take over the area around the zoo for themselves would never allow their parking lot, much less mall installations to be used for the exchange of ideas. This project and Miami Wilds together will destroy the last respite users of SW 152 Street have to the blight of excess commercial and residential development of South Miami.

For several minutes, drivers on SW 152nd Street get to rest their eyes on the greenery of a forest of sorts and to escape for a moment from the traffic jams and visual pollution which RAM, Odebrecht (contractor for Miami Wilds) and other developers plan to bring to South Miami. The

HCP makes a big point that business exposure to SW 152nd Street is essential to project profitability. However, from the point of view of users of that artery it is essential that no business be established since to do so would impede their view of nature. This point is underlined by view of the amount of time that drivers can will be stuck in traffic jams on a street which is fast becoming another Kendall Drive, jokingly know as Miami's longest parking lot. Of all the piecemeal studies done, the traffic study was perhaps the weakest in failing to measure traffic flows properly at the time the study was done, to factor in nickel-and-dime development which has slowed flows since that study was done. It also failed to take into account the impact cars entering and exiting businesses located along the road way would have in slowing traffic flow and increasing travel times.

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.

Economic and Financial Damage to the Community:

This megaproject and the associated Miami Wilds project together with nickel-and-dime development in the area around the tract (housing complexes, new businesses, etc) and in other areas south and west affect many thousands of people who use the main arteries: the Florida Turnpike, SW 117th Ave, SW 152nd St, SW 184th St. and SW 137th Ave. These projects plus increase vehicular traffic associated with the county's slow recovery from the Great Recession that started in 2007. Small developments have already increased commute times on these streets and avenues. And yet, the only people notified concerning RAM's project were limited to 1,625 residents within half a mile of the project. This appalling secrecy allowed a project which will hurt hundreds of thousands of people and proceed without giving each of them adequate notice of the damage it would do. My commute from my residence near Quail Roost to my office near the Tamiami Airport area has already increased by two minutes each way even before these mega projects even start. Most affected will be those people living on SW 152nd Street or using that street on daily commutes or when attempting to do business with the numerous small businesses located in the plazas off it. SW 152nd Street is not wide enough to handle current traffic and backups on the Florida Turnpike at the 152nd Street exit are already daily, large and dangerous. Residents of the communities on the north side of 152nd Street and which have only one exit, onto 152nd Street, will be bottled up in their communities; increased travel times will affect property values. Since the benefit from this development will go to RAM whereas external costs will be imposed on all road users for miles around, RAM should be required to compensate each person affected for the cost of increased travel time and other costs imposed by this development. Local realtors should be surveyed and estimates made of impacts on property values of homes on 152nd Street and on those farther south or west whose property values are affected by longer commutes attributable to increased traffic generated by these two megaprojects and by the nickel-and-dime development in the area.

There is additional damage done by the increased traffic and congestion whose external cost needs to be evaluated and paid for by RAM to those affected by it. The emissions from automobile and engines of other vehicles will increase pollution, particularly because motors of these vehicles will be operating inefficiently at slow speeds or stopped completely due to gridlock. A new traffic study needs to be done using appropriate techniques (unlike the previous study which used axle counts) to estimate what these costs are in terms of higher levels of pollutants and higher levels of pulmonary diseases due to increased emissions. Because trade winds are generally from the southwest, residents on the north side of SW152nd St. will be the most severely affected but all road users will be affected and have a right to be compensated by RAM and other developers.

The proposed RAM development would directly affect existing businesses in the area surrounding the project through direct competition. Its sister megaproject Miami Wilds and the continuing nickel-and-dime development in neighboring areas would exacerbate congestion and increase travel times, making it harder for customers to get to these local businesses. Walmarts and similar big box stores have a negative impact on existing local businesses by providing

everything and competing not just with individual businesses but collectively with nearly all types of businesses. The additional retail space made available in the RAM project would continue the tendency of putting new businesses in competition with existing businesses to the point that neither the new businesses nor the existing businesses are able to operate as going concerns.

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

Section 2: Environmental Setting

The Richmond tract is the largest remaining area of pine rocklands outside of the Everglades (Long Pine, whose environmental characteristics are significantly different). It needs to be considered in its entirety and the analysis of the CRC area and off-site mitigation offset is partial, incomplete and unhelpful. If species that are currently found or which could return to the tract if remedial action were taken, are to continue to exist in Miami-Dade, the Richmond tract needs to be preserved and protected as a unit. Preservation actions need to address the entirety of the tract and partial analysis such as that presented in the HCP does not do this. The analysis of what is in the HCP can fairly be described as perfunctory: for species which vary wildly from year-to-year in their populations, some of which require fire to appear at all, a one or two year evaluation period is totally inadequate. That fact that the only experts having access to carry out such a survey are consultants hired by RAM makes any finding they come up with subject to question. Peer review requires that research be replicable by other independent researchers. This has not been allowed either by RAM or by the University of Miami, itself a research institution.

It is not possible to put an economic value on a species, although there is good reason to believe that all species have some value. Institutions like the Fish and Wildlife Service have pointed out the value of some species without quantifying what exactly the economic value of an individual species could be. (<https://www.fws.gov/nativeamerican/pdf/why-save-endangered-species.pdf>) Since the Richmond Pine Rocklands habitat is unique, it is not impossible that the cure for some of the diseases which affect South Florida or other parts of the United States could be found in the poorly studied habitat soon to be paved over for a parking lot for Walmart.

The progression of pine rockland habitats to climax hardwood forests has occurred in the Richmond tract due to years of fire suppression and neglect. In the CRC area, much of the fire suppression was the responsibility of the University of Miami, which has benefitted financially from the sale of a property on which it had paid negligible tax until land was rezoned and converted to commercial use. RAM's HCP classifies land in the CRC property as Developed Lands (**33.3** acres, of which 16.5 are sodded and 4.0 are monkey cages); some of this might be susceptible to reconversion to pine rocklands. The category "Disturbed Upland" accounts for **20.9** acres includes 10.1 described as exotic hardwood and 9.0 historically marl prairie plus 1.8 of scraped area dominated by turf species. Pinerock lands in various states of deterioration are reported to cover **80.0** acres. Rockland hammocks are reported to cover **4.0** acres. The total area

is given as **137.9** acres. No analysis is presented of what it would take to reconvert any of these areas to pine rocklands as they were before fire suppression occurred. Fortunately, the FWS has: it has shown what it takes to recover habitat for the deltoid spurge (which is covered in the HCP page 32) of the HCP. FWS prescribes **fire at 3-7 year intervals**, preceded by the removal of excess combustible material to keeps fire temperatures low. (<https://www.fws.gov/verobeach/MSRPPDFs/Deltoid.PDF>)

HCP Survey Methodology: Survey work took place mostly in September and October 2014 with some visits in October and one each in November 2014 and January 2015. So survey work was limited to a single year and specifically to the fall-winter months of that year. It seems likely that research at other times of the year might have turned up species that are prevalent in other months. Also, no multi-year research was conducted which would also give a better idea of what species are present on the property. No reports are available for the Miami Wilds or other parts of the Richmond tract.

Acoustic surveys were done for a limited number of species including bats, birds, insects, snakes, and turtles, limited to the following:

Eastern Indigo Snake
Rimrock crowned snake
Gopher tortoise
Florida Leafwing Butterfly
Miami Tiger Beetle (found on 4 sites in the Richmond tract and one nearby but unidentified site)
White-Crowned Pigeon
Tiny polygala
(100 plants found).
Deltoid Spurge
Crenulate Lead-plant
Florida Brickell Bush
Garber's Spurge
Small's Milkpea
Sand Flax
Carter's Small-Flowered Flax
Blodgett's Silver Bush
Florida Prairie Clover
Florida Pineland Crabgrass
Everglades Bully
Florida Bristle Fern
Clamshell Orchid

Summary: The findings are repetitive because of the degradation of the habitat surveyed and can be summarized as follows. Most of them are not found either in the CRC site or the mitigation area which have been extremely degraded from their original state which was mostly pine

rocklands, due to fire suppression and neglect. Areas that were built over or otherwise taken from their original land use were not restored to prior conditions upon sale of the property to RAM. Fire-suppression allowed detritus and organic material to build up and encouraged the transition from native pine rockland species to invasive non-native species, requiring remedial manual clearing and soil restoration before fire could again carry out its role to keep the understory reasonably clear and open to support the growth of species typical of pine rockland habitats. The fact that some species are found on other pine rocklands within a few miles of the Richmond Pine Rockland tract indicates that habitat was restored, many of these species would return either on their own or with outside support.

Alternatives:

The HCP provides a number of alternatives which is the strategy preferred by the World Bank in costing and determining benefits from development projects. (<https://openknowledge.worldbank.org/bitstream/handle/10986/2561/624700PUB0Cost00Box0361484B0PUBLIC0.pdf?sequence=1.pdf>) However, as is often the case in such analysis, alternatives generally are chosen before any economic analysis is done and what analysis is carried out focuses on alternatives of interest to those proposing the projects. Alternatives often do not include those which make the most sense from the standpoint of the larger society. The alternative most favorable to the needs of the people of South Miami and South Florida for greenspace and for a quality of life that does not require them to spend inordinate amounts of time in their cars stalled in traffic jams: preservation and restoration with no development. None of the alternatives are costed nor are the financial benefits for the developer valued and shown in the report. External costs to society are ignored, and as are benefits (in any) to the affected populations.

The alternatives proposed are:

- 4.1.1 No action (Do nothing)
- 4.1.2 Redevelopment Only - No Restoration
- 4.1.3 Maximum build-out
- 4.1.4 County-approved Zoning 2013
- 4.1.5 County Approved Zoning/Stepping Stones and Southern Corridor
- 4.1.6 Reduced Commercial/Increased Preserve

The missing alternative which should be numbered 4.1.0 since it should be the first alternative considered: No development for the entire Richmond Tract; Restoration of Neglected Habitat.

4.1.0. No commercial development on Entire Tract; Restoration of Neglected Habitat.

Besides being the only intact green space in South Miami, much of the tract can be restored to pine rocklands habitat by doing what should have been during the years of neglect: removing

exotic species and hardwood physically, removing excess organic material, 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) (more frequent perhaps in initial years while rebuilding the habitat) and reintroduction of species found in similar pine rocklands habitats which do not reappear spontaneously, elimination of the RAM residential/commercial development project and the Miami Wilds water-theme park). The University of Miami was given stewardship over this federal land in part because of its expertise and commitment to management of the environment. It failed to maintain this legacy and through a combination of neglect and suppression of fire, assured the degradation of pine rockland habitat. Miami-Dade should capture some of the windfall from the tax advantages conferred on the University of Miami from the sale of the current property forming the basis of the CRC and any remaining properties, earmarking proceeds for use in restoration of this habitat.

4.1.1. Do nothing.

This alternative is a strawman: no one at this point in time proposes allowing degradation to continue. Point 1 of the section on feasibility is in essence that the project should make RAM immensely wealthy and that conserving part of the habitat is the price of making this single goal possible. Point 2 notes that the goals of the investors to make a fortune at the expense of the citizens of Miami would not be realized if some development does not go ahead. Any investments which RAM and others have made are sunken costs which economist learn to ignore and were made in order to promote a project which is detrimental to the interest of the county and its citizens and which has gotten as far as it has, by a non-transparent process based on inaccurate and tendentious information. This argument is of no value in analyzing the economic merits of the proposed alternative. The management covenant would be vacated, allowing the county to put in place a better management plan designed to preserve the entire Richmond tract for the benefits of the citizens and their progeny. Point 4 is incorrect (do no restoration or even maintenance), since the public now understands how the resource of inestimable value has been allowed to degrade in order to justify private appropriation and use while making promises which cannot be kept to preserve a small part of the area covered by the HCP.

4.1.2 Redevelopment Only

This option would allow development only on 25 acres (parking lots and blimp field) which are so seriously disturbed as to be prohibitively expensive to return to their former status. It is actually the best option that includes any development at all because such development is limited to area that is already disturbed beyond recovery. It also preserves the view of drivers and passers by of nature (even if initially this is nature of a degraded sort) from SW 152nd St; they are thus rewarded with a view of nature instead of the visual assault of another few minutes of urban sprawl. That this alternative is less profitable to RAM and its investors is again of no concern for economists who look to the good of the society as a whole which would be largely preserved. The additional traffic would continue to be a problem but would be far less than under the alternatives which follow. The absence of an “anchor” (bigbox) store should be perceived as an

advantage from the point of view of the public and the county, for reasons which will be discussed below.

An aware citizenry is not going to permit development which ignores habitat restoration and which impacts negatively on their quality of life.

4.1.3 Maximum build-out

This “alternative” is not relevant because it would never meet environmental objections.

4.1.4. County Approved Zoning in 2013

This “alternative” is not relevant because it would never meet environmental objections.

4.1.5 County Approved Zoning/Stepping Stones and Southern Corridor

This alternative adds 2.2 acres of “stepping stones”: tiny islands of habitat separated by roadways carrying an estimated 10,000 speeding cars a day across the corridor. Anyone who has ridden on rural roads in Miami-Dade knows how roads act as slaughterhouses for wildlife of all kinds particularly when habitat exists on both sides of the road, particularly for slow-moving insects and snakes which take a long time to cross wide swaths of asphalt.

4.1.6 Reduced Commercial/Increased Preserve

The HCP lists this as the preferred alternative because it meets the private financial criteria of return on RAM’s investment, increases stepping stones to 3.9 acres, on-site preserves to 52.3 acres and includes a 50.1 acre off-site mitigation area.

Assumptions underlying the HCP

The underlying assumption of all these alternatives is what the World Bank calls EGAP = Everything Goes as Planned. (World Bank, p. 20) Anyone who has lived in South Florida knows that almost nothing goes as planned, with cost over-runs and delays on public project, including those managed by Miami Wilds contractor Odebrecht. World Bank cautions its staff in doing economic analysis to assign probabilities to outcomes and to conduct analysis on the value of each outcome weighted by the probability of its occurrence, with the expected value for the project being the sum of the value of individual outcomes weighted by the likelihood of their occurrence. (World Bank, p. 16) The Bank calls for maximum likelihood estimates rather than the rosy “best case” scenarios, such as those presented in documents such as RAM’s draft HCP.

The Richmond tract should be analyzed holistically and not on a piecemeal basis. The question to be answered is this one: Do we, the people of south Florida, want our remaining green space preserved, restored and put to use for us? Or do we want to allow what little remains to be chipped away piecemeal, by a RAM for its project of residences for the wealthy buyers and

another Walmart here, by a Fox for a water park misnomered “Miami Wilds” there, and nickel-and-dime development everywhere, chipping away at our quality of life as people and as habitat for the creatures with whom we should share the limited space of south Florida. A holistic approach would weigh the probability of an occurrence by its value to society.

For example, if Miami Wilds phase I and phase II were built, a total of 2,750 low-wage jobs are promised; whether or not they would materialize is another issue. But economists love to make assumptions, so let’s assume that Phase I materializes and produces half the combined phase I and phase II jobs (1,375 jobs). These jobs won’t pay much more than \$12 per hour, or \$25,000 per worker per year. Thus, the total wage bill would be \$34.4 million per year, with struggling workers competing for expensive housing and trying to pay student loans. If the project lasted 10 years, the local economy would be \$344 million richer. But let’s suppose instead and as the World Bank does for its projects, that this water park takes a dive and closes after only 5 years in operation. Workers would be left stranded; Miami would be left high and dry, with a derelict waterpark like so many others all over Florida. (<http://www.businessinsider.com/photos-of-the-abandoned-disney-river-country-water-park-2016-8#>
https://en.wikipedia.org/wiki/List_of_defunct_amusement_parks#United_States_of_America) This outcome has a high probability of occurrence since it will take visitors them an hour to get off the Turnpike and into the park and the same to get back on it at the end of the day. Meanwhile, the green space paved over for the park will be gone forever and with it the habitat for the species which proper management would have encouraged to stay and which proper restoration would have brought back from near extinction.

RAM’s project entails similar risks. Forgetting about Amazon and eBay which are already taking customers away brick-and-mortar stores, there are already more bigbox stores in south Florida than the economy can support. Furthermore, a new megamall, the biggest in the United States, is slated for development in northwestern Miami-Dade county. Approved by the same process which allowed the RAM and Miami Wilds project to get as far as they have gotten, the NW Miami-Dade supermall will be built by the same people who developed the Mall of the Americas; the difference is that this supermall will not be developed in the middle of the boondocks but in already heavily populated and developed Miami-Dade. Other bigbox stores exist within an easy drive of the MetroZoo area: Walmart on South Dixie Highway and SW 211th St. and another on Kendall Drive and 158th Ave. Sears Southland store South Dixie Highway and SW 112th Ave. may close leaving another anchor store empty. Without an anchor to bring in “traffic” into the mall, other retailers in the complex would probably also fail, with a devastating impact on the tax-base and leaving behind a derelict development for which the community has permanently sacrificed its greenspace, wildlife and quality of life for the false promise of economic prosperity. Many communities are faced with this plight but few are asked to sacrifice what those of south Miami are being asked to give up, an irreplaceable habitat which has almost disappeared through overdevelopment and careless stewardship.

Periodic controlled fires are essential to restoring and then preserving resurrected pine rockland habitats. Fire in the middle of a residential/commercial development will be difficult to start and

to maintain. Florida is below the national average for asthma but nonetheless, 6.6% of adults and 8.3% of children currently have asthma in Florida. (https://www.cdc.gov/asthma/stateprofiles/asthma_in_fl.pdf) Even some economists suffer from asthma, and so do some lawyers. Is it conceivable that in a residential complex full of expensive units sold to well-connected, wealthy people, there will not be a single smart lawyer? Or that business like Walmart and LA Fitness won't have lawyers of their own? Each prescribed burn will be object of a lawsuit. If any development is permitted, fire as the necessary tool to restore and preserve pine rockland habitats will not be available. Each prescribed burn will be the subject of a lawsuit, and, if they are allowed at all, fires will occur if and when lawsuits is settled and not at the time of the year called for by scientific management of the habitat.

Annex 10 on economic analysis is very superficial, designating MSA (minor statistical area 6.2) as the primary market for the Walmart-anchored business and saying that MSAs 6.1 and 7.2 would also form part of its secondary market areas. The report does not provide so much as a map to show where the primary and secondary statistical areas referred to as primary and secondary markets are located. Nevertheless annex 10 argues that there won't be enough acres of retail space available in the statistical areas (6.1, 6.2 and 7.2) on aggregate without providing figures to differentiate between the primary and secondary markets. It notes that space is adequate out to the 2020 planning horizon but argues that this fact should be ignored.) It talks about construction jobs which based on construction wage averages for Miami-Dade construction workers, would bring each worker \$62,000; the numbers may be correct perhaps but the workers won't be from Miami-Dade. RAM Realty is based in Palm Beach and can be expected to bring in its own crew; most construction workers will not be from Miami-Dade county. Furthermore, most construction workers in Miami-Dade are already fully employed in the growing economy. Annex 10 also talks about permanent retail jobs, but when you work through the numbers, the wage rate used is \$12 per hours, not exactly a living wage in what is becoming an expensive part of the country for workers to live in. It also notes that Perrine and Richmond Heights (majority black areas) are nearby and presumably would provide much of the workforce for retailers; this statement is not corroborated by past experience. Retail is a language-intensive business and requires a bilingual workforce to sell to a clientele which includes a high proportion of Spanish-language speakers; most blacks do not speak Spanish and will not be hired. The inclusion of this statement is another example of false promises made by the HCP in an attempt to convince the population of neighboring areas that they would benefit from this project.

Economic analysis should focus on the external costs which the RAM and its sister Miami Wilds project impose on the population in terms of longer average commute times, the loss of greenspace, the slower travel times and increased congestion on SW 152nd St and on alternate arteries and on north-south arteries near the project. Proponents of these projects should reimburse those of us who are affected for our additional fuel costs, additional insurance premiums from more and worse accidents, for additional commuting time, the lower property values of our homes, and lost time with family and friends and for the inability to get to the mom-and-pop businesses we now patronize because we can get to them in a reasonable time.

The RAM and associated project will make road congestion worse and impede access to these business and other day-to-day activities in the area around the Zoo while trapping shoppers in their malls. The visual pollution of having to look at more ugly businesses instead of trees along the south side of SW 152nd St, and the irreparable loss of pine rockland habitat and species which will be lost as a result of these unwanted developments should also be compensated. Miami-Dade County has a responsibility to its citizens to improve their quality of life and not to make it worse through greenspace depletion, species extinction and more urban sprawl in order to bring greater returns to the University of Miami and to a few investors not based in Miami-Dade county.

Conclusion

The Habitat Conservation Plan which was three years in the making cannot be independently corroborated and cannot even be fact-checked in the 60 days allowed for comment. The comment period should be extended to 90 days. However, public hearings on the proposal for the RAM site and more broadly on the fate of how the entire Richmond pine rocklands tract surrounding MetroZoo and to allow FWS to provide guidance to the public and to the County on how it should be restored and conserved.

The FWS should allow independent scientists the same amount of time that the developers had (3 years). These independent researchers should have unfettered access to all properties that make up the Richmond tract and should be able to carry out their work during whatever months that they deem most appropriate.

Part of what needs to be done is to undo on some significant area what has been wrought by years of neglect. The University of Miami is one of the world renowned research institutions in research and learning on the environment. Its reputation is on the line. The University was given the stewardship over significant areas of federal land which at the time, if not pristine, was much closer to what a pine rocklands is understood to be than what is there today. It failed to take care of what it was freely given and ex post did not merit the trust that the Federal Government put in it. Even back when the University of Miami received this land, its scientists knew that periodic fire was an integral part of the maintenance of a pine rocklands ecosystem. The UM accepted that the stewardship and took advantage of the classification of the land as agricultural, paying negligible taxes until harvesting its windfall with the sale of the land to RAM Realty for development. If this land had been in the middle of the Redlands Agricultural Area and UM had let noxious weeds overrun the area, neighboring farmers would have been up in arms.

Under the supervision of its own scientists and in concert with independent scientists and following guidance provided by the FWS, the University of Miami should be required to immediately pick a significant compact area (say 25 acres) and restore it at its own expense. This restoration should be carried out with the agreement and under the supervision of the FWS which should be properly compensated, in this age of proposed federal budget cuts, for its efforts. This restoration would include the manual removal of non-native plant, cutting and removal

hardwoods not found in pine rockland and removal of excess organic material and controlled burns and to restore this block to as a block as a witness to what is truly being lost as a result of the conversion from the pine rocklands habitat that it constituted at the time that the UM's stewardship started to the mess that it is in now and which is described in RAM's HCP. Annual monitoring at appropriate times of the year by UM and other scientists will confirm if the restoration is bringing back species not found at the time that the HCP survey was done but which could be expected to be found in a pine rocklands such as that of the Richmond tract. After three years, the FWS will have a better idea of what species this habitat will support. At that time, FWS and the community and the county should revisit the question of whether or not the entire Richmond tract should be carved up piecemeal with projects like RAM's and FOX's into commercial and residential development of which Miami already has a surfeit or restored and preserved for use in perpetuity by the community, including not just people but also the other species with whom we share the land of south Florida.

I'll be looking forward to learning your decision on restoring and conserving the habitat of the Richmond pine rocklands.

With kind regards,

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