

**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 native Floridian and long-time resident of Miami-Dade County, I would like to voice my concerns regarding the development along SW 152 Avenue (Coral Reef Drive) in Miami-Dade County, FL, known locally as Coral Reef Commons. This is the site of a proposed Walmart, LA Fitness, Chick-fil-A, and an apartment complex.

I am a botanist and author of *Everglades Wildflowers* and other popular Florida wildflower and exploring guides, and am also a charter member of the Florida Native Plant Society along with being a member of Tropical Audubon Society's Board of Directors and a member of the plant list committee for the Florida Exotic Pest Plant Council.

The development known as Coral Reef Commons is a part of a larger pine rockland parcel known as the Richmond Pineland Complex that encompasses Zoo Miami, University of Miami property, U.S. Coast Guard property, the Luis Martinez Army Reserve Base, the Robert Morgan Vocational School, and a large Miami-Dade County Park called Larry & Penny Thompson Park. Globally imperiled pine rockland habitat occurs on all of those properties and I have photographed the federal endangered deltoid spurge (*Chamaesyce deltoidea* subsp. *deltoidea*) and the federal threatened Mosier's false boneset or Florida brickellbush (*Brickellia mosieri*) within Larry & Penny Thompson Park, Zoo Miami, the U.S. Coast Guard property, and on the Luis Martinez Army Reserve Base, so it is difficult to believe that these two federally-protected taxa do not occur on the property owned by Coral Reef Commons. Much of that property is degraded but, with proper resource management, coupled with the introduction of prescribed fire, it is highly likely that these and other protected plants would be present in the soil seed bank. There are numerous state-listed threatened and endangered species throughout the Richmond Pineland Complex and, being surrounded by a sea

of development, the habitat serves as a critically important natural area for resident and migratory birds as well as other wildlife. The federally-listed Florida bonneted bat and the Miami tiger beetle also occur within the Richmond Pineland Complex.

One important concern is that the University of Miami is now offering 50 acres of pine rockland habitat as a preserve to help mitigate the loss of habitat from the proposed development. Pine rockland habitat cannot exist as a viable plant community without fire, and pine rockland habitat historically burned on a 3 to 5 year frequency, which is the preferred time frame for conducting prescribed burns in the absence of naturally-occurring wildfires. As a former naturalist and resource manager for Miami-Dade Parks Department, I do not see how prescribed burns on 50 acres could possibly be conducted adjacent to a Walmart, LA Fitness, a restaurant, and apartment buildings. And, without fire, the viability of the habitat is jeopardized through natural succession. If this natural succession is allowed to occur, the maturing understory will create a major fire hazard should there be a wildfire (which is a 100% chance) and a hot wildfire with a heavy fuel load will kill the slash pine overstory and would pose a serious danger to nearby homes and businesses.

In short, this development is unacceptable on a number of issues and should be denied. At the very least, there should be a public hearing so the people can voice their concerns. Traffic gridlock created by this development would be a major concern for all residents in the vicinity.

Cordially

Roger L. Hammer, Ph.D