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June 13, 2000

Mr. James C. Duck
Chief, Planning Division
ATTN: Mr. Elmar Kurzbach
U.S. Army Corps of Engineers
P.O. Box 4790
Jacksonville, Florida 32232-0019

Re: Scoping Notice for Modified Water
Deliveries to Everglades National Park:
Raising Tamiami Trail, Broward and Miami
Dade Counties

Dear Mr. Duck:

The Office of Environmental Services of the Florida Fish and Wildlife Conservation Commission has received the scoping notice for the referenced project, and offers the following concerns that we would like to see addressed during the development of a General Reevaluation Report (GRR) and Supplemental Environmental Impact Statement (SEIS).

The reason that a GRR and SEIS are being developed is that new information acquired since the project was approved in 1992 indicates that the original design would be insufficient to pass the volume of water that would need to be conveyed under the Tamiami Trail via the program of Modified Water Deliveries to Everglades National Park. Four options are being considered: (1) construct four bridges and institute a maintenance program for the remaining roadway, (2) construct four bridges and raise the remaining roadbed one to two feet; (3) construct a new roadway north of the existing alignment, and (4) construct a new roadway south of the existing alignment. The portion of Tamiami Trail that would be affected by this project is limited to that stretch which lies between Water Conservation Area 3B and Everglades National Park; however, the extent to which construction might alter the highway immediately west and east of this stretch is not clear.

We have three major areas of concern with regard to the potential impacts of this project.

1. Maintenance or enhancement of existing recreational access points. Depending on the extent of construction, as many as five access areas to Water Conservation Area 3B and the eastern corner of Water Conservation Area 3A could be affected by the redesign and construction. We request that we be consulted early in the planning stages so that we

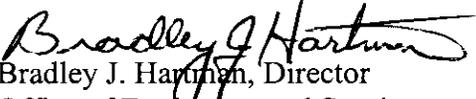
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may work with the U.S. Army Corps of Engineers and the Florida Department of Transportation to maintain or, if feasible, improve these access points and reduce impacts during construction.

2. Potential loss of Everglades marsh. The third option would likely eliminate portions of Water Conservation Area 3B, particularly as the road would need to circumvent the Tigertail Camp, which lies along the L-29 levee. The fourth option would similarly affect Everglades National Park, particularly as the road would need to circumvent the Osceola Camp. Given the loss of native habitat that has already occurred in the Everglades, we would find it difficult to support any alternative that would result in further loss of native Everglades marsh.
3. Protection of nearby active rookeries. Two active rookeries occur very near this portion of Tamiami Trail. One of these, "Tamiami West," has had a recent history of nesting activity by wood storks (endangered) and tricolored herons, little blue herons, snowy egrets, and white ibis (all species of special concern). This past year, an estimated 1,200 to 1,300 wood stork nests were observed at this colony (T. Towles, FWC, pers. comm.). While the recent blasting for the S-355 structures did not appear to cause any disruption in nesting that was already underway at the time, we are concerned that prolonged construction that starts during the nesting season might prove to be more damaging; therefore, we would recommend that any construction near the rookery be started outside of the nesting season. Our staff would be happy to work with yours during the planning process to determine the appropriate distance to satisfy this particular concern.

Because our concerns with regard to recreational access are likely to be unique to the Florida Fish and Wildlife Conservation Commission, we intend to submit to you Planning Aid Letters and a Fish and Wildlife Coordination Act report independent of those submitted by the U.S. Department of the Interior. If you have any further questions, please feel free to contact Mr. Timothy Towles (561-778-5094) in our office in Vero Beach.

Sincerely,


Bradley J. Hartman, Director
Office of Environmental Services

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cc: Ms. Marjorie Bixby, FDOT, Miami
Mr. Stephen Forsythe, FWS, Vero Beach
Superintendent Richard Ring, ENP, Homestead