

Everglades Coalition

1000 Friends of Florida Arthur R. Marshall Foundation Audubon Florida Audubon of Southwest Florida Audubon of the Western Everglades Audubon Society of the Everglades

Backcountry Fly Fishers of Naples

Bullsugar Alliance

Caloosahatchee River Citizens Association/ Riverwatch

Center for Biological Diversity Clean Water Action

Conservancy of Southwest Florida

Defenders of Wildlife

"Ding" Darling Wildlife Society

Earthjustice

Environment Florida
Everglades Foundation

Everglades Law Center

Everglades Trust

Florida Conservation Voters Education Fund

Florida Defenders of the Environment

Florida Keys Environmental Fund

Florida Native Plant Society

Florida Oceanographic Society

Friends of the Arthur R. Marshall Loxahatchee National Wildlife Refuge

Friends of the Everglades

Hendry-Glades Audubon Society International Dark-Sky Association,

FL Chapter

Izaak Walton League of America Izaak Walton League Florida Division Izaak Walton League Florida Keys Chapter Izaak Walton League Mangrove Chapter Last Stand

League of Women Voters of Florida Loxahatchee River Coalition

Martin County Conservation Alliance

Miami Pine Rocklands Coalition

Miami Waterkeeper

National Audubon Society

National Parks Conservation Association

National Wildlife Refuge Association Natural Resources Defense Council

North Carolina Outward Bound School

Ocean Research & Conservation Association Reef Relief

Sanibel-Captiva Conservation Foundation Save It Now. Glades!

Sierra Club

Sierra Club Florida Chapter

Sierra Club Broward Group

Sierra Club Calusa Group Sierra Club Central Florida Group

Sierra Club Loxahatchee Group

Sierra Club Miami Group

Snook and Gamefish Foundation

South Florida Audubon Society

Southern Alliance for Clean Energy The Florida Wildlife Federation

The Institute for Regional Conservation

The National Wildlife Federation

The Urban Environment League of

Greater Miami

Theodore Roosevelt Conservation Committed to full protection and restoration of America's Everglades
Partnership

Tropical Audubon Society

January 13, 2018

Everglades National Park
Attention: Agnes McLean
Old Tamiami Trail Modifications EA
950 N. Krome Avenue, Homestead FL 33030

Re: Support for Modifications to Old Tamiami Trail to Benefit Everglades National Park

Dear Ms. McLean:

On behalf of the 62 member organizations of the Everglades Coalition committed to the protection and restoration of America's Everglades, we appreciate the opportunity to comment on the Old Tamiami Trail Modifications Environmental Assessment (EA) released by the National Park Service (NPS) in December 2017.

The Everglades Coalition supports advancing modifications to Old Tamiami Trail as outlined in the preferred alternative, which includes 5.45 miles of road removal to facilitate restoration of the natural ecosystem. This project was authorized by Congress within the Central Everglades Plan (CEP) in 2016. In combination with other CEP South project components, the removal of Old Tamiami Trail will enhance sheetflow from Water Conservation Area (WCA) 3A into Shark River Slough via the S-12C and S-12D structures. The Everglades Coalition fully supports the project purpose of enhancing natural resources of Everglades National Park (ENP) by improving marsh connectivity and wetland functionality.

We appreciate NPS leadership in advancing the EA for removal of Old Tamiami Trail.

As stated in the document, these modifications to Tamiami Trail will help accomplish the NPS mission to "preserve unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations."

Tamiami Trail has been an obstruction to freshwater flow into the Everglades since its construction in 1928. The Everglades Coalition has long supported

efforts to bridge Tamiami Trail, reestablishing freshwater flow and reconnecting habitat into ENP. With the first mile of bridging fully constructed and operational, and another 2.6 miles of bridging currently underway, we are beginning to realize the ecosystem benefits of that project. The urgent need for this project was highlighted during the extreme wet season events of 2017, when both Hurricane Irma and other isolated downpour incidents left the entire ecosystem inundated with water. Additional bridging and road raising along Tamiami Trail, coupled with the important work outlined in this EA to remove obstacles that currently inhibit flow, is critical for ENP and the entire Greater Everglades. Among other benefits, the preferred alternative will:

- Improve hydrology and water quality. "Removal of almost the entire Old Tamiami Trail would increase hydrologic connectivity, improve sheetflow, increase stages, and increase flow capacity at S-12C and S-12D" (Chapter 4, p. 57).
- **Expand wetlands and improve vegetation conditions.** The preferred alternative would expand critical ENP habitat, with up to 31 acres of uplands converted to wetlands. The outlined modifications to hydrologic connectivity would "improve vegetation and wetlands south of the roadway, resulting in beneficial impacts" (Chapter 4, pg. 60).
- **Provide benefits to the Everglades Snail Kite.** "Removal of 5.45 miles of the Old Tamiami Trail would result in long-term, direct and indirect, beneficial impacts from increased prey (apple snail) abundance and foraging opportunities associated with increased hydroperiods in the park and a net increase in wetland habitat. Cumulative mpacts would be long term and beneficial" (Chapter 4, p. 64).
- Provide benefits to colonial wading birds including the Little Blue Heron, Tricolored Heron,
 Reddish Egret, and Roseate Spoonbill. "Removing 5.45 miles of the Old Tamiami Trail would
 increase wetland habitat in the project area by up to 31 acres and partially restore predrainage
 hydrologic conditions in the park, resulting in improved foraging conditions and long-term,
 direct and indirect, beneficial impacts. Cumulative impacts would be long-term and beneficial"
 (Chapter 4, p. 79).
- Enhance visitor experience. In addition to the increased recreational value of a restored ecosystem, the Everglades Coalition appreciates the NPS vision for cultural interpretation of 0.25 miles of the historic Old Tamiami Trail, which will be enhanced with educational signage about the significant role this roadway played in the state's history.

Once again, the Everglades Coalition appreciates NPS leadership in working to advance removal of Old Tamiami Trail. We support the preferred alternative and the tremendous ecosystem benefits outline in the EA that will be achieved. As always, we appreciate the opportunity to provide comment and look

forward to our continued partnership as we work toward our shared goals for the protection and restoration of Everglades National Park.

Sincerely,

Mark Perry Co-Chair Michael J. Baldwin Co-Chair