

From: Richard@brownscombe.net 

Subject: Save Four FXE Natural Areas

Date: April 10, 2019 at 12:12 PM

To: Chris Lagerbloom CLagerbloom@fortlauderdale.gov

Cc: Mayor Dean Trantalis DTrantalis@fortlauderdale.gov, Ben Sorensen BSorensen@fortlauderdale.gov, HMoraitis@fortlauderdale.gov, PRaju@fortlauderdale.gov, RMckinzie@fortlauderdale.gov, Burke, Peter PBURKE@broward.org



Dear Mr. Lagerbloom,

**Summary Statement: Please take the two NRAs out of the lease agreements. Miller Legg and Associates is incapable of preparing required species lists or assessing habitat scarcity. Please use the recommendations provided to help the City hire a qualified expert. Save the last 1% of Fort Lauderdale's natural land for the rare and endangered plants and wildlife there. Don't violate environment law.**

Thank you for the letter (attached) and 36 pages of two NRA (Natural Resource Area or natural areas) mitigation site documents.

Although I believe you, that "the NRA's are not part of the construction development that has been proposed," it is highly peculiar that they are contained INSIDE the lease boundaries and in the lease asset descriptions. It will be difficult to explain to the public that they are not under the lessees' control. I suggest removing the NRAs from all the lease documents and ads.

Thank you also for that statement that you "will continue to review your concerns with Miller Legg and Associates, specifically related to the status of Parcel 12A/12B and Lot 20/21", but there are two big problems with this as an answer.

First, Miller Legg and Associates are incapable of identifying rare and endangered species or assessing habitat scarcity. Species identification and habitat assessment inform the City Commission's and City attorneys' and public's understanding of whether it is legal to destroy them and whether it is desirable to destroy them as natural areas.

Rare species identification is hard. It requires years of experience with South Florida species and habitats. It's a scientific determination. That's why I recommended (in prior emails or just ask) three sources who can help the City identify an expert capable of making a rare species list and a habitat scarcity assessment (comparing these properties to the scarcity or abundance of similar habitats in Broward and South Florida). We are lucky to have a scientific nonprofit environmental conservation organization (highly recognized in Florida and internationally), the Institute of Regional Conservation under George Gann, Chief Conservation Strategist, nearby in Delray Beach. Because they are South Florida experts, they can help Fort Lauderdale hire an expert for this assessment. If you have the "Mayo Clinic of natural areas" next door, it makes sense to ask their advice.

Second, these are not "my" concerns, as you stated. They are our concerns. We have already put literally 99% of Fort Lauderdale land to human use leaving only 1% for all the species of plants and wildlife that lived here before us. People are surprised that on these odd lots and parcels (409 properties in Broward County, most tiny) still live these last remaining populations. Some, endemic species, live nowhere else in the world. Environmental laws were written to help keep us from destroying them against intense financial incentives to take the land. It is the City Commissioners, hopefully representing the public interest (not Miller Legg and Associates), who should decide to protect Lot 20/21 and Parcel 12A/12B.

#### END WORDS

**The easier and right thing to do: The City Comprehensive Plan shows Lot 20/21 (5.43 acres) as one of only five Local Area[s] of Particular Concern (because it is rare Scrub habitat) and the Plan shows Parcel 12A/12B (6 acres) as "Freshwater Forest ... Wetland" (a wetland forest, see photo below). Just protect them as natural areas because both contain rare and protected species and habitat and because protecting them avoids violating environmental law.**

Richard Brownscombe

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Letter from  
Lagerb...19.pdf

Broward Chapter of Florida Native Plant Society April Newsletter

<https://mailchi.mp/06b849b62f48/save-four-fort-lauderdale-natural-areas-from-destruction?e=d7895d764d>

