

Appendix K
Agency and Tribal DEIS Comments
and NPS Responses



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Comment ID	Ref./Page No.	Comment	Response
U.S. Environmental Protection Agency			
N/A	N/A	The Draft EIS has a thorough review of the setting and context related to climate change and level rise in the project area and does a good job of analyzing the potential for climate change impacts in each of the impact categories. However, there does not appear to be any discussion of the extent to which the current proposed design of Tamiami Trail will conform to the predictions of sea level rise in the foreseeable future discussed in the document. EPA recommends that the Final EIS include a discussion of sea level rise and adaptation of the preferred alternative in the context of the proposed modifications.	An operational plan is not included as a part of this project. Therefore, water operations, including the impacts of sea level rise and water operations on the proposed bridges, will be assessed as part of a separate operational plan. When water operations are addressed at a later date, the operational plan will have to be developed in association with the proposed project's infrastructure and will have to address the potential impacts of sea level rise.
N/A	N/A	At present an operational plan for manipulation of water levels in the L-29 Canal is being developed; however, since it has not been completed, it is not reviewed in the Draft EIS. Full realization of project benefits is dependent upon an operational plan that utilizes the structural capacity of the preferred alternative. Potential benefits that would occur once an operational plan is defined and executed include enhancement of degraded wetland habitats within the Northeast Shark River Slough system. The Draft EIS suggests that implementation of the preferred alternative in conjunction with a new operational plan would mitigate for itself, meaning that permanent and temporary wetland impacts associated with the construction of the proposed project would be offset by the enhancement to wetlands attributed to changed operations. However, long-term effects to wetlands resulting from operations remain unknown, since an operational plan has not yet been developed for the project alternatives. Since there is uncertainty as to the level of wetland improvements that would be achieved with the operation of the project, EPA recommends that the Final EIS discuss the timing of development of the operations plan. The Final EIS should also discuss an adaptive management strategy that would address appropriate mitigation responsibilities should anticipated project benefits not adequately offset the project's impacts to wetland value and functions. An off-site mitigation plan should be implemented. Potential off-site mitigation scenarios may include purchase of mitigation bank credits at Hole-in-the-Donut Mitigation Bank or performing mitigation elsewhere on ENP property.	Since this project only addresses the construction of the bridge and road infrastructure along Tamiami Trail, an operational plan is not included as a part of this project. Therefore, when water operations are addressed at a later date, the operational plan will have to be developed in association with the proposed project's infrastructure. It will be noted in the FEIS that "full realization of project benefits is dependent upon an operational plan that utilizes the structural capacity of the preferred alternative." To the extent that it is known, the timing for development of this plan will be discussed in the FEIS. While it is unlikely that this project will not be self-mitigating with a water operations plan in place, a discussion has been included in the FEIS, which addresses the need for an off-site mitigation as a contingency if anticipated project benefits do not adequately offset the project's impacts to wetland value and functions.
N/A	N/A	A number of specific resource protection measures, as well as a comprehensive monitoring and evaluation program, are proposed to be implemented during and after construction. Construction procedures would include the use of best management practices to contain disturbed sediments and reduce water quality impacts. These practices would include employment of staked silt fences and turbidity barriers. The turbidity barriers would be employed in canals and deep water sites prior to commencement of construction at a sufficient distance from the work zone. Anticipated monitoring during construction would include water quality monitoring and monitoring for protected wildlife species. A turbidity monitoring plan would be implemented during construction to ensure continued compliance with state water quality criteria. If monitoring reveals that turbidity levels exceed the standards, construction activities would be immediately halted and would not resume until corrective actions are employed. Anticipated long-term monitoring/maintenance would include roadway/bridge monitoring for maintenance activities conducted by FDOT.	Mitigation measures and BMPs for the project are discussed in Section 2.5. This section will be reviewed to ensure that all of the appropriate BMPs are included in the FEIS, including those necessary for the protection of water quality. Additionally, these mitigation measures and BMPs will be reviewed during the design stage of the project to ensure that all appropriate BMPs will be employed before, during, and after construction. FDOT will be responsible for the roadway upon completion of construction and will therefore be responsible for any long-term monitoring/maintenance of the roadway/bridges.
N/A	N/A	Because the project is located in an Outstanding Florida Water (OFW) which has restrictive water quality requirements including no degradation of water quality above ambient levels, EPA strongly recommends implementation of all mitigation measures described above and in the Draft EIS. All turbidity barriers should remain in place and be inspected daily throughout the construction phase of the project. After construction, temporarily disturbed areas should be restored to pre-existing conditions (e.g. regraded, soil uncompacted, etc) in upland areas and wetlands allowed to reestablish naturally. The Draft EIS does not identify any mitigation measures related to post-construction stormwater management associated with the roadway. To further assist in the long-term reduction of pollutant loadings to surface water resources in the project area, EPA recommends that all stormwater runoff from the proposed roadway be collected and treated before being discharged to surface waters. Drainage from bridges and elevated sections should be diverted and discharged to upland areas, as much as possible, to assist in attenuation of stormwater pollution. Given the large quantity of material excavated from the road bed, EPA also strongly recommends recycling as much material as possible for use in other area projects. All measures should be clearly identified in the Final EIS.	Mitigation measures and BMPs for the project are discussed in Section 2.5. This section will be reviewed to ensure that all of the appropriate BMPs are included in the FEIS, including those necessary for the protection of water quality. These mitigation measures and BMPs will be reviewed during the design stage of the project to ensure that all appropriate BMPs will be employed before, during, and after construction. Additionally, runoff from impervious bridge section will have treatment through CDS (Continuous Deflective Separation) units on either side of each bridged section. Other BMPs such as bridge sweeping will also be considered for minimizing contaminants in the runoff. The details for treatment of runoff will be included in the FEIS.

Please note that comments are quoted directly from correspondence received by NPS from agencies and tribes; therefore misspellings and typographical errors in comments were not corrected.

Comment ID	Ref./Page No.	Comment	Response
Florida Department of Transportation			
1	General	The document should clearly state the DOI is responsible for all aspects of this project including designing, permitting, building and implementing this project. In addition, the NPS/DOI needs to obtain FDOT approval on design, plans and specifications before proceeding to construction. This approval shall include submittal of all plans, designs and specifications signed and sealed by a Florida registered Professional Engineer. The NPS' commitment to do so should be stated in the FEIS and ROD.	The following language has been added to Section 2.2 of the FEIS: "All of the proposed alternatives would be built to satisfy FDOT standards. The NPS is only responsible for the content of the information contained in this EIS. All future actions associated with the implementation of the Tamiami Trail Modifications: Next Steps project subsequent to the release of this document, including design, permitting, and construction of the project will be determined at a later date. In addition, it should be noted that before proceeding with construction, it will be necessary to obtain FDOT approval on design, plans, and specifications of the project before proceeding to construction. This approval shall include submittal of all plans, designs, and specifications, which will be signed and sealed by a Florida registered Professional Engineer."
2	General	The NPS need to get FDOT approval on design, plans and specifications before proceeding to construction. This approval shall include submittal of all plans, designs and specifications signed and sealed by a Florida registered Professional Engineer. The NPS' commitment to do so should be stated in the Final EIS.	The following language has been added to Section 2.2 of the FEIS: "All of the proposed alternatives would be built to satisfy FDOT standards. The NPS is only responsible for the content of the information contained in this EIS. All future actions associated with the implementation of the Tamiami Trail Modifications: Next Steps project subsequent to the release of this document, including design, permitting, and construction of the project will be determined at a later date. In addition, it should be noted that before proceeding with construction, it will be necessary to obtain FDOT approval on design, plans, and specifications of the project before proceeding to construction. This approval shall include submittal of all plans, designs, and specifications, which will be signed and sealed by a Florida registered Professional Engineer."
3	General	We continue to have very serious concerns as expressed in our letter of June 3, 2010 and in previous correspondence, regarding misrepresentation of the 9.7 foot Design High Water (DHW) level as the "stage" water level to be achieved as a result of this project. Based on a joint meeting of the NPS, ACOE and FDOT on April 21, 2009, the NPS's letter of May 19, 2009 and our response of June 10, 2009 (attached), the FDOT and NPS agreed that the DHW for this project would be 9.7 feet (NGVD). Despite FDOT's repeated verbal and written requests to correct this information, the DEIS contains confusing and conflicting information regarding water levels and does not clearly and fully disclose the restoration water levels anticipated from this project. Per the information provided by NPS at the April 2009 meeting, the two modeling evaluations prepared for this project, specifically the Natural System Model (NSM) analysis and the Everglades National Park (ENP) Model analysis, resulted in October Mean Stages of 8.47 and 8.95 feet, respectively. These anticipated restoration water levels (also called 'stage' or 'operational' water level) serve as the basis upon which the DHW was calculated, and represent the canal stage water level constraint upon which the Next Step Project is designed. While the DEIS correctly describes 9.7 feet as the DHW for this project it appears to contain no information regarding the stage water level (up to 8.9 feet) upon which the DHW was calculated. This, combined with statements in the DEIS and Project Evaluation Report (May 2010) such as, "...Importantly, the increased bridging of Alternative 6E will allow stages in the L-29 Canal to be raised to 9.7 feet," gives the impression water levels in the L-29 can be raised, operated, or are expected to achieve through unconstrained flow, a 9.7 foot stage level on a regular basis. It is fundamentally imperative the DHW water level for this project not be misrepresented as the stage water level for this project. These two water levels are by definition mutually exclusive. The canal stage water level is by definition lower than the DHW water level, and, according to the NPS' models, is anticipated to be approximately up to 8.95 feet for this project.	The difference between the stage water level and the DHW for this project will be clarified in the document to avoid any further confusion between the 9.7-foot DHW and the stage water level.

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4	General	Allowance of a 9.7 foot stage water level in the L-29 Canal on a regular basis would expose the roadway base to risk of saturation during rainfall events by exceeding the design protections (20-yr., 24-hr. event) incorporated into the roadway design. This could result in compromising the serviceability, structural integrity and most importantly public safety on this roadway due to the risk of roadway base failure. A 9.7 foot stage level would also exceed the 8.75 foot Control Water Elevation (CWE) (i.e., the average high water elevation under the structure) for the Mod Waters 1-mile bridge presently under construction, as well as for the bridges planned under the Next Steps Project, by approximately a foot. This potentially may interfere with operation, inspection and maintenance of the Mod Waters 1-mile substitute facility as well as the new facility (roadway and bridges) proposed under the Tamiami Trail Next Steps Project.	The DHW of 9.7 is not an operational constraint and is not intended to be an operational constraint. The DHW is defined as the 20-year 24-hour stage, assuming a natural systems conditions, based on regional hydrologic model and a 36-year simulated period of record. The 100 year flood stage is 10.1 for this area in the NSM and was utilized for overtopping criteria. As mentioned in the response to comment #3, the difference between the 9.7-foot DHW and stage water level will be clarified in the document to avoid any further confusion.
5	General	While the FDOT agreed, at the request of the ACOE, to a series of operational controls under the Tamiami Trail Mod Waters Limited Reevaluation Report (LRR) Project to temporarily allow water levels to exceed the 7.89 foot stage and approach the 8.5 foot DHW during the dry season (approximately six months of the year), FDOT does not support this same approach as a long term solution under the Next Steps Project. This operational agreement was prepared to help maximize benefits under the Corps' cost-constrained design under the LRR and to minimize expenditure of funds on improvements that would be removed with a future Tamiami Trail Project (the Next Steps Project). However, per our letter of June 3, 2010, the Next Steps Project must be designed such that the 9.7 foot DHW criterion is met all 12 months of the year since this project provides final water restoration improvements to this segment of Tamiami Trail and since the ultimate goal of this project is to allow unregulated flows. The FDOT needs assurance the Next Steps Projects will be operated within the constraints of the NPS's selected design for this project (i.e., up to an approximate 8.95 foot stage) throughout all 12 months of the year. This assurance should be stated in the FEIS and ROD.	This project only addresses the construction of the bridge and road infrastructure along Tamiami Trail. An operational plan is not included as a part of this project. Therefore, when water operations are addressed at a later date, the operational plan will have to be developed in association with the proposed project's infrastructure. It will be noted in the FEIS that "full realization of project benefits is dependent upon an operational plan that utilizes the structural capacity of the preferred alternative."
6	General	The FEIS should further clarify the known present and future constraints on stage water levels under the designs selected by the ACOE (the Mod Waters 1-mile bridge) and NPS (Next Steps Project) for Tamiami Trail, on the Combined Structural and Operational Plan (CSOP) and other future operational plans.	The FEIS will include information about known present and future constraints on stage water levels as part of the cumulative impacts discussion.
7	General	If the anticipated River of Grass (ROG) purchase enables higher stage water levels than the approximate 8.95 foot stage currently planned for under Next Steps, it may be prudent to combine the Mod Waters 1-mile bridge (presently under initial stages of construction) and Next Steps Projects into one project which could be redesigned to accommodate a higher stage water level. The combination of these plans into one construction project would substantially reduce construction time as well as disruption to the motoring public, and could result in substantial cost savings by eliminating unnecessary construction on the roadway as planned under the Mod Waters/LRR Project. This may be feasible since no bridge pilings for the 1-mile bridge have yet been placed.	Due to the anticipated construction schedules for the two separate projects, it is unlikely that the two projects could be combined.
8	General	To the extent that more natural flows may be implemented under the 1-mile bridge by 2013, and would coincide with commencement of construction of the Next Steps Project, also scheduled to begin in 2013, the impacts from the higher stages of between 7.89 and 8.5 feet in L-29 Canal (under the Mod Waters /LRR Project) could impact the Next Steps construction activities due to wetter conditions and longer hydroperiods in the construction area. This may require a change in construction methodology resulting in higher construction costs and a longer construction time for this project, the impacts of which are not addressed in the DEIS. If, alternately, the higher flows enabled under the LRR Project need to be delayed to facilitate construction of the Next Steps Project, this would render the roadway improvements currently under construction for the Mod Waters Project unnecessary, since the Next Steps Project would immediately replace the newly completed roadway improvements built under the Mod Waters/LRR Project, with additional bridges and reconstructed roadway.	This project only addresses the construction of the bridge and road infrastructure along Tamiami Trail. An operational plan is not included as a part of this project. Therefore, any necessary changes in construction methodology required as a result of future changes in water operations will be addressed during the design phase of this project.

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9	General	Transmissivity in the region is also a very important design parameter. The differential between the higher proposed elevations of the Tamiami Canal west of Krome Avenue compared to the lower existing elevations of the canal east of Krome Avenue may impact and modify existing underground water movement (transmissivity rate). As a result, the water elevation of the canal east of Krome Avenue may increase if high stages in the canal west of Krome Avenue are maintained for a long period of time. This may negatively affect the drainage within the Cities of Sweetwater and Doral. These potential impacts will need to be evaluated as part of the future operational plan for this project.	This project only addresses the construction of the bridge and road infrastructure along Tamiami Trail. An operational plan is not included as a part of this project. Therefore, these issues associated with transmissivity will be addressed at a later date as part of a separate operational plan.
10	General	Recognizing that only some portions of Tamiami Trail will be bridged and that roadway segments will be required for the project, it is important that the pavement design abide by the FDOT Flexible Pavement Design Manual and the Plans Preparation Manual (PPM). Per our letter of June 10, 2009, a minimum two foot base clearance is required throughout this project. Since drawdown rates for water elevations in the Everglades after a heavy storm are relatively slow compared to that of a traditional roadway bounded by swales, it is imperative that the NPS / ACOE's design provide the required two feet of base clearance. This will serve as a safety factor as it relates to drawdown rates and the anticipated extended duration of the roadway base to wet conditions. While the Engineering Appendix references adherence to a two foot base clearance, the DEIS repeatedly states all project alternatives will be designed to a 12.3 foot crown elevation. This crown elevation correlates with the 12.3 foot crown elevation utilized in the 2005 RGRR preferred alternative project design, and appears to be based on an approximate one foot base clearance. While the RGRR project had a one foot clearance from bottom of base to the DHW of 9.7 feet, that clearance was based on a pavement design which included black (asphaltic) base and an asphalt overlay on the existing roadway. The Next Steps Project involves complete reconstruction of the roadway between the bridges and requires a minimum two foot base clearance. A two foot clearance above the DHW of 9.7 feet yields a crown elevation of roughly 13.8 feet. This higher crown elevation will likely result in additional construction costs and may require reassessment of project impacts as described in this DEIS. The DEIS should specify the pavement design on which the 12.3 foot crown elevation calculation is based, and should verify and revise the crown elevation as stated in the document, if necessary.	The pavement design for this project will abide by the FDOT Flexible Pavement Design Manual and the Plans Preparation Manual. This project will utilize a 2-foot base clearance, as requested by FDOT. The minimum crown elevation for the roadway is 13.13 ft-NGVD29. The 13.13-ft. was calculated as follows: EL 9.7 (DHW) + 2' base clearance + 10" base (OBG 9) +3.5" structural course +0.75" friction course +0.24' for 2% cross slope over 12' travel lane = 13.13'
11	General	Please provide information regarding emergency operations of the water management system and their impact on the Preferred Alternative 6E.	This project only addresses the construction of the bridge and road infrastructure along Tamiami Trail. An operational plan is not included as a part of this project. Therefore, emergency operations of the water management system will be addressed as part of a separate operational plan, which will have to be developed in association with the proposed project's infrastructure.
12	General	No supporting information or documentation regarding construction cost was provided in the DEIS or Engineering Appendix, therefore FDOT has not reviewed or evaluated the construction cost estimates for this project.	It is noted that FDOT has not reviewed the construction cost estimates for the project.
13	General	Per the DEIS, an Attorney's Opinion of Compensability has been prepared for estimated damages to Tamiami Trail as a result of this project. Please note that a new Highway Easement Deed and Relocation Agreement will be necessary for this project.	It is noted that a new Highway Easement Deed and Relocation Agreement will be necessary for this project.
14	Section 1.2, Page 1-3	DEIS erroneously states the 2005 RGRR recommended plan would "accommodate the higher water levels (up to 9.7 ft stage) under the road". This statement should be corrected to reflect the RGRR (Recommended Plan) project was designed to a 9.7 feet Design High Water (DHW) based on the 20-year 24- hour storm, which correlates to an average daily stage of approximately 8.88 feet NGVD.	The difference between the stage water level and the DHW for this project will be clarified in the document to avoid any further confusion between the 9.7-foot DHW and the stage water level.

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15	Chapter 2	Both the DEIS and the Engineering Appendix refer to an allowed stage elevation of 9.7 feet in the canal instead of referring to it as the DHW elevation. As per previous comments, the reports need to be consistent and refer to the 9.7 feet as the DHW elevation. Please reference page 3 of the April 21, 2009 meeting minutes provided by the Everglades National Park (ENP) regarding "Agreement of Design High Water Determination and Study Timeline" as follows: NSM Mean October + Storm Events Method: October Mean Stage = 8.47 feet NGVD 20-year, 24-hour storm = 0.82 feet 100 year storm = 1.1 feet DHW = 8.47 feet + 0.82 feet = 9.29 feet NGVD Overtopping Criteria = 8.47 feet + 1.1 feet = 9.57 feet NGVD CWE = 8.75 feet NGVD ENP Mean October + Storm Events Method: October Mean Stage = 8.95 feet NGVD 20 year, 24-hour storm = 0.82 feet 100 year storm = 1.1 feet DHW = 8.95 feet + 0.82 feet = 9.77 feet NGVD Overtopping Criteria = 8.95 feet + 1.1 feet = 10.05 feet NGVD CWE = feet NGVD Per the evaluation provided above, the daily stages in the L-29 Canal are expected range up to 8.47-8.95 ft (October mean stage). The DEIS and Engineering Appendix should be revised to accurately reflect the daily stage and DHW levels for this project.	The difference between the stage water level and the DHW for this project will be clarified in the document to avoid any further confusion between the 9.7-foot DHW and the stage water level.
16	Section 2.2, Pages 2-3 to 2-8	There is reference in several portions of the DEIS of reconstructing the highway embankment to "raise the crown elevation to 12.3 feet, the minimum required based on the design high water of 9.7 feet and the roadway cross section geometry". It is not clear where the 12.3 feet elevation is derived from. However, just based on the DHW = 9.7 feet + 2 feet base clearance would result in an elevation of 11.7 feet at the bottom of the base at the edge of shoulder; this only leaves 0.5 feet to the 12.3 feet crown elevation mentioned in the report. When the pavement and base thickness are added, in addition to the shoulder and lane width multiplied by the cross slopes (an estimated 1.8 feet, based on typical section design included in the Engineering Appendix); the minimum required crown elevation would be approximately 13.5 feet [9.7 feet DHW + 2 feet base clearance + 1.8 feet (thickness & cross slope)]. This needs to be verified and corrected in the FEIS and Engineering Appendix.	This project will utilize a 2-foot base clearance, as requested by FDOT. The minimum crown elevation for the roadway is 13.13 ft-NGVD29. The 13.13-ft. was calculated as follows: EL 9.7 (DHW) + 2' base clearance + 10" base (OBG 9) +3.5" structural course +0.75" friction course +0.24' for 2% cross slope over 12' travel lane = 13.13' Both the engineering appendix and FEIS will be checked for consistency and corrected as necessary.
17	Section 2.2.2, Page 2-6	DEIS, Table 2-1 (Action Alternative Comparison) Estimated Total Project Cost is different from Appendix A –Engineering Report Table 6-4 (Alternative Comparison) Estimated cost. Assure consistency between different sections of the project documentation.	Consistency between the appendices and the main document will be checked.
18	Section 2.2.2, Page 2-6	Construction of four (4) additional bridges appears to open the possibility of airboats to cross under Tamiami Trail from north to south and vice versa within the project area. Neither the DEIS nor the attached Engineering Appendix provides any evaluation or analysis of whether these bridges will allow or accommodate airboats crossing including the height range of these boats and whether they will be able to cross under the bridges all or part of the year. The FDOT is concerned regarding public safety, potential damage to the bridge structure, as well as damage to private property if proper clearances are not provided.	This project was not directed to address the issue of airboat passage under the bridges; therefore, clearance for airboat passage was not a bridge design criterion.
19	Section 2.2.3, Page 2-6	Recognizing that only some portions of Tamiami Trail will be bridged and that roadway segments will be required for the project, it is important that the pavement design abide by the FDOT Flexible Pavement Design Manual and the Plans Preparation Manual (PPM). Since drawdown rates for water elevations in the Everglades after a heavy storm are relatively slow compared to that of a traditional roadway bounded by swales, it is imperative that the NPS / ACOE's design provide two feet of base clearance. This will serve as a safety factor as it relates to drawdown rates and the anticipated extended duration of the roadway base to wet conditions.	The pavement design for this project will abide by the FDOT Flexible Pavement Design Manual and the Plans Preparation Manual.
20	Section 3.10, Page 3-76	Section 3.10 references noise modeling for three noise sensitive receivers. Was a separate Noise Study Report prepared for this project? If so, it is recommended that report be referenced in the DEIS.	A noise analysis was completed as part of the DEIS for this project, but a separate Noise Study Report was not prepared.

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21	Section 3.13, Page 3-88	Section 3.13 references a Phase I Hazardous, Toxic and Radioactive Waste Assessment prepared for the project. Was a separate report prepared? If so, it is recommended this report be referenced in the DEIS.	A separate Phase I HTRW report was prepared for this project. The Phase I HTRW Assessment will be referenced in the FEIS and included as an appendix.
22	Section 3.11 and 4.12, Page 3-78 and Page 4-67	The discussion of the roadway facility in the Affected Environment and Environmental Consequences sections should be strengthened to further expand on the importance of Tamiami Trail as an important east-west transportation facility which serves the motoring public and provides sole access to the Miccosukee Tribal Village, the numerous airboats concessions on the Trail and the Shark Valley Visitors Center of Everglades National Park. Tamiami Trail also serves as an alternate hurricane evacuation route as well as providing opportunity for bicyclist and recreational (consumptive and non-consumptive) uses.	<p>The following language has been added to section 3.12: "The segment of highway in Miami-Dade County is located approximately 26 miles south of Interstate-75, another major east-west route across South Florida. Since Tamiami Trail parallels Interstate-75 across South Florida, the highway serves as an alternate hurricane evacuation route for residents of both coasts. To the south is US Highway-1, which intersects the Tamiami Trail in eastern Miami-Dade County and provides thoroughfare to the Florida Keys.</p> <p>In addition to providing a major transportation link between South Florida's east and west coast population centers, the highway provides passage through Big Cypress National Preserve and a Miccosukee Indian Tribe reservation. Tamiami Trail also serves as the sole overland access route to two Miccosukee Indian tribal camps (Osceola and Tiger Tail) and several commercial airboat concessions. As a scenic byway, Tamiami Trail provides motorized and non-motorized travelers with 50 miles of picturesque landscape and wildlife viewing opportunities."</p> <p>The following language has been added to section 4.13.3: "Short-term transportation-related impacts such as lane closures, reduced speed limits, and reduced accessibility to visitor facilities/activities would be limited to the areas currently under construction and would be mitigated by measures such as a Maintenance of Traffic (MOT) plan and construction scheduling during off-peak traffic hours. At least one access route to all private, public, and commercial facilities would be kept open at all times during construction, thus further minimizing short-term impacts to the transportation facility. Additionally, in the event of an emergency evacuation event (such as evacuation orders for a major hurricane), all construction would cease during evacuation (and return) and at least one lane would be available and open in the direction of the ordered evacuation (and return)."</p>
23	Section 4.6, Page 4-35	This section indicates bridging will provide increased habitat connectivity for the Federally endangered Florida Panther, however neither the DEIS nor Engineering Appendix contain any information regarding whether materials to be used for the bridge slopes is suitable for use by panthers or other wildlife. It is recommended to confirm suitability of bridge slope materials with the appropriate wildlife agencies. This treatment may be beneficial/warranted as the Florida Panther may avoid the deepest/wettest area under the bridge	Project coordination with the FFWCC and the USFWS is ongoing. The suitability of bridge slope materials will be coordinated with these agencies now and during the design phase of this project.
24	Section 4.11, Page 4-66	The analysis of short-term (i.e. construction) noise and vibration on the residential areas within the project limits, including Osceola and Tiger Tail Camps, should include evaluation of specific construction activities such as blasting, pile driving and night time work, which may affect these areas.	Both short-term and long-term noise impacts to residential areas have been analyzed as part of the EIS. Specific construction methodology will be determined during the design and permitting phases of the project. When developing these construction methods, in accordance with NPS Management Practices, construction activities would be limited to the smallest area possible in order to minimize impacts, including noise impacts. Also, the contractor would be required to adhere to the latest edition of FDOT Standard Specifications for Road and Bridge Construction.

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25	Section 4.13, Page 4-73	The DEIS does not address the potential construction impacts from the higher water levels to be enabled by the Mod Waters Tamiami Trail Project, on the construction of the Tamiami Trail: Next Steps Project.	While water operations are not being analyzed as a part of this project, the discussion of cumulative impacts, including Mod Waters, will be expanded in the FEIS.
26	Section 4.14, Page 4-74	Please note an asbestos survey will be necessary for demolished structured including culverts, and asbestos abatement and removal may be required during construction	The following language has been added to section 4.14.3 in the discussion of potential impacts of each of the action alternatives: "It should also be noted that an asbestos survey will be necessary for the demolition of any structures in association with this alternative, including any buildings or drainage features (i.e., culverts). If asbestos is discovered during the survey, asbestos abatement and removal will be required during demolition."
27	Section 6	This section should be expanded to include a discussion of early coordination with FDOT regarding the DHW and roadway base clearance requirements for this project, as well as reference to the May 19, 2009 letter from ENP to FDOT and responses from FDOT to ENP dated June 10, 2009 and July 27, 2009.	This section has been expanded in the FEIS to include all coordination conducted to date between NPS and FDOT.
28	Section 6.3, Table 6-2, Page 6-6	According to the Council on Environmental Quality, Section 1502.17, the environmental impact statement shall list the names, together with their qualifications, of the persons who were primarily responsible for preparing the environmental impact statement or significant background papers, including basic components of the statement. FDOT staff member, Barbara Culhane, AICP, and its consultant representative Mary Tery Vilches, P.E. neither prepared, nor made major contributions to this DEIS document. Please delete these names from Table 6-2 –List of Preparers and Contributors.	Barbara Culhane and Mary Tery Vilches will be removed from the document preparers list.
29	Section 8.0, Page 8-1	In order to insure the use of proper and consistent terminology when describing water levels in this statement, we request that the Glossary (Section 8.0) be augmented in the FEIS to include definitions for "stage water level", "operational water level", "unconstrained flow", "control water elevation" and "design high water" since these technical terms are used throughout the DEIS and appendices.	These terms will be included in the glossary of the FEIS.
30	General	As expressed in our letter of June 3, 2010, key engineering information is not yet available for this project which could substantially affect its cost, design and potential impacts. To date, the engineering provided for this project consists primarily of a roadway alignment with some geometric features but few details regarding preliminary roadway typical section, preliminary pavement design, drainage design, geotechnical analysis, structural details, bridge profiles and clearances, and location of acceleration and deceleration lanes. Given the NPS's DEIS and required Project Evaluation Report are based on an alignment and without the above information, be aware that the many missing elements of the design which prohibit us from giving you more detailed comments at this time, are likely to affect the project design and cost as engineering plans are further developed for implementation by the Department of Interior (DOI).	Comment noted.
31	General	The project design needs to include measures and techniques to prevent differential settlement. The bridge plans need to include complete notes to address the preforming and grouting of the piles adequately, and avoid potential conflicts during construction. The clear and complete notes should be included in the design plans.	Concur; These items will be addressed as design progresses. The bridge plans will include complete notes to address performing and grouting of the piles and notes to avoid potential conflicts during construction.
32	General	Please be advised that during the design phase, add a note requesting a certification package after the piles of the bent are completed, certifying integrity and capacity (axial and lateral) of all piles in the bent. Each package shall include a signed and sealed certification letter, and clearly legible copies of the driving records, all dynamic tests and load tests performed in the bent, numerical analysis including GRLWEAPS and CAPWAPS performed during the driving criteria derivation, and PDA records performed in the bent.	Concur; These items will be addressed as design progresses. The bridge plans will include complete notes to address pile testing and certification required during construction.
33	General	Access must be maintained during all construction phases to the various businesses and private properties on the south-side of Tamiami Trail. The Maintenance of Traffic (MOT) does not indicate how access to these properties is to be maintained. Three of the major businesses include Cooper Town Airboat Rides and Restaurant, Gator Park, and Everglades Safari Park.	Concur; The MOT phasing typical sections provided allow for maintenance of both westbound and eastbound traffic during all phases of construction. MOT plan sheets and notes detailing connectivity to the existing businesses and corresponding signage will be developed during the final design phase of this project. A note will be added to Plate C-2 to indicate that access to existing properties will be maintained during all phases of construction and Section 6.4.1 of the report will be updated accordingly.

Comment ID	Ref./Page No.	Comment	Response
34	General	This general drainage review of this report focuses on the contents of the Draft Final Engineering Appendix for the Tamiami Trail Modifications: Next Steps report (2/19/10). This review does not include a detailed review of the modeling approach and assumptions implemented using the Natural Systems Model (NSM) or USACE RMA-2 model.	The modeling details are in USACE 2005 RGRR. This report only summarizes the 2005 RGRR modeling and its results. Hence, modeling details were omitted from this report.
35	General	Please note that all documents, plans, typical section package and pavement design package shall be signed and sealed by a Florida Registered Professional Engineer.	Concur, all documents, roadway plans, structure plans, typical section package and pavement design package developed during the final design phase of this project will be signed and sealed by a Florida registered Professional Engineer. A note will be added to the report confirming this requirement.
36	General	The discussion of the environmental impacts at the staging areas should be documented. If possible, it is advisable to test the soil, groundwater and/or surface water at a proposed staging area prior to use to establish pre-existing conditions. Closure of the site may require environmental sampling. Stormwater controls, such as silt fences, to prevent discharge of contaminated runoff into water bodies should be used where such discharge may cause violations of water quality standards.	The proposed staging areas are unchanged from the previous design for the 1-mile bridge and are currently being used for construction operations. The report will be updated to clarify that applicable BMPs will be utilized during construction to meet NPDES requirements.
37	General	Please note per our letter dated July 27, 2009, that the FDOT is not part of the Project Delivery Team; we request the FEIS document be corrected to reflect this prior to distribution to the public.	Information only; Comment noted.
38	General	Please submit during design phase a traffic lane closure analysis showing optimum lane closure hours.	Concur; If required, a traffic lane closure analysis will be performed during the design phase.
39	Section 1.1, Page 1	Regarding this statement, "...Alternative 6E was selected as the preferred alternative and consists of approximately 5.4 miles of girder bridges separated into 4 sections with the remaining Tamiami Trail roadway raised to allow a stage of 9.7 ft-NGVD in L-29C, and adding down ramps..." Please, be consistent throughout the report. It has been established that 9.7 ft is the DHW, not the daily stage in the L-29 Canal.	Concur; All applicable sections of the report will be revised to clarify an established DHW of 9.7 ft-NGVD29.
40	Section 1.1, Page 1	Please update the following statement, "...Plans for Modification to Tamiami Trail (Project Invitation No. W912EP-08-R-0025), for a 1-mile bridge construction project on the east end of the study area, with an anticipated construction start date in October 2009, is assumed as existing condition in this study." to reflect that this project is already under construction as of December 2009.	Concur; Section 1.1 will be revised to indicate a construction start date of December 2009.
41	Section 2.4 & 2.5, Pages 8 & 9	The CSOP analysis was used to determine the volume of water available and the NSM was utilized to determine the October mean stage and DHW. However, there does not appear to be a "feedback loop" where the DHW of 9.7 ft-NGVD is used as an operational constraint in the proposed structure operations in CSOP. The Draft GRR for CSOP shows flood releases when stages exceed 10.5 ft-NGVD in October which exceeds the DHW elevation. It is recommended that 2 separate notes be added: (1) the base clearance criteria will be included as a constraint in the proposed operational plan; (2) the proposed operational plan will call for a review of measured data on an inter-annual basis to verify the required base clearance is being provided.	Nonconcur: The DHW of 9.7 is not an operational constraint and is not intended to be an operational constraint. The DHW is defined as the 20-year 24-hour stage, assuming a natural systems conditions, based on regional hydrologic model and a 36 simulated period of record. The 100 year flood stage is 10.1 for this area in the NSM and was utilized for overtopping criteria. There is no Formal Draft GRR for CSOP. This criteria has already been reviewed by Mr. Ricardo Salazar from FDOT and found acceptable.
42	Section 2.8, Page 20	Please consider changing graph size to an 11 "x17" size page.	Concur. We will do our best to make the figure readable.
43	Section 4.4.1, page 25	The appendix notes "A scour analysis was not performed during this study." Per the FDOT Plans Preparation Manual, Chapter 27, a Bridge Hydraulic Report (BHR) and Bridge Hydraulic Recommendation Sheet shall be prepared for new structures and widening. Please include the guidelines for preparing the BHR and indicate it is required to be prepared during the final design phase. Since the BHR will use peak flows and design stages from the modeling efforts developed as part of this report, this report should document results to support future development of the BHR.	Concur; The report will be revised to include guidelines for preparing the BHR and indicate that it is required to be prepared during the final design phase.
44	Section 4.5, Page 28	The report does not mention the use of a surcharge (placing fill to induce stresses higher than the expected stresses during service, including the traffic surcharge loads) to address settlements, but does mention the use of settlement plates. If no surcharge is being placed, what is the plan to prevent settlement? If the proposed plan is monitoring only after placement of the base, please be advised this type of treatment that has not been successful in previous projects and FDOT does not anticipate accepting its use here. Observation of the behavior of fill over organic soils at a particular level does not yield information regarding how this fill will behave if the future loads are greater.	Information only; Based on the settlement calculations, the majority of settlement of the organic soils is anticipated to occur during the construction phase which settlement plates would be used to document. The use of a surcharge during the construction period to accelerate settlement of the organic soils and to reduce secondary settlement is not considered practical due to limited the ROW on this roadway. During the design phase, additional boings and consolidation testing should be performed within the organic material within and outside of the existing embankment to provide additional design data concerning this organic layer.

Comment ID	Ref./Page No.	Comment	Response
45	Section 6.0, Civil Design, Page 30-33	Please add a sub-section in Section 6 to require the following during the final design stage: Final design of drainage and stormwater management systems shall be in compliance with the FDOT Drainage Manual; the FDOT District Six Drainage Guidelines; Florida Administrative Code, Chapter 14-86; and the requirements of the regulatory agencies. Final design will include the engineering analysis necessary to design any or all of the following: cross drains, roadway ditches, outfall ditches, storm sewers, retention/detention facilities, roadway drainage and water management, and other drainage systems and elements of systems as required for a complete analysis. Continued coordination with the FDOT, District Six, Drainage Design Section will be required as the project Final Design proceeds. Full documentation of all meetings and decisions are to be documented as part of the Drainage documentation and reports.	Concur; Section 6.0 will be updated to include a Recommendations paragraph for the final design phase.
46	Section 6.1.4, Page 33	Please note the functional classification of Tamiami Trail is "rural principal arterial."	Concur; Functional classification will be revised.
47	Section 6.1.5, Page 33 Section 6.1.7, Page 33 & 34	According to Section 6.1.7 the paved shoulder width is 5 feet. However, Section 6.1.5 Typical Sections shows: The existing typical section for Tamiami Trail consists of two 12-foot travel lanes, one in each direction with 4 to 5 feet of paved shoulder on both sides. Please clarify the paved shoulder width for this project.	Concur; Section 6.1.7 will be revised to match the BASE PLANS showing five-foot paved shoulders.
48	Section 6.1.7, Page 33	Please modify the following statement to indicate which edition of the PPM is referenced "After the BASE PLANS construction is complete, the horizontal alignment on Tamiami Trail will satisfy the following FDOT Plans Preparation Manual (PPM) Volume 1 requirements."	Concur; Sentence will be revised to specify the 2008 PPM.
49	Section 6.1.8, Page 34	Please consider removing fatalities from the following statement: "careless driving is the most common contributing cause of crashes and fatalities..." This statement is appropriate when referring to crashes in general, but not fatalities since it implies all fatalities are related to this contributing cause. Section 6.1.8, Crash Data, has almost no information. Please provide the complete information so the crash analysis can be properly reviewed. The following expands on the information that should be included for the crash data Section 6.1.8, as indicated in the previous comment: <ol style="list-style-type: none"> 1. Include a summary table of the crashes by crash type, number of injury crashes, number of wet surface and night time crashes, contributing causes, etc. 2. Identify the probable causes for the occurrence of crashes in relation to the existing roadway conditions that could be mitigated with this project. 3. Identify crash clusters within the study corridor. 4. Perform an expected value analysis and confidence level analysis at critical intersections within the study corridor, as applicable. 5. Perform a confidence interval analysis for the study corridor. 6. Include in the crash data summary the latest two years 2007 and 2008 already available from FDOT to get a better representation of the crash data. 7. Please request from the Traffic Ops Office the High Crash Segment and Spot Lists for last 3 years to determine if there are any spots or segments within the study corridor that are considered high crash locations. 	Concur; Section 6.1.8 will be expanded as recommended using 2007-2008 crash data.
50	Section 6.1.10, Page 35	Please refer to comment No. 17 in the November 12, 2009 letter from FDOT to ENP. "Pavement condition survey is available from the Department and should reflect the most recent survey." Please coordinate with FDOT, District Six, Planning Office to obtain the latest information and include it in the Engineering Appendix.	Information only; Since the corridor is currently under construction, the BASE PLANS are considered as existing condition for discussion of pavement conditions. The FDOT, District Six Planning Office will be contacted for the most recent pavement condition survey report and applicable information will be included in the Final Engineering Appendix.
51	Section 6.2.2, Page 35	The Traffic Volume Projections section has almost no information. Please provide the complete information so it can be properly reviewed. Please elaborate more on the following items in relation to the traffic projections for this project: <ol style="list-style-type: none"> 1. Indicate the Interim Year of this project. 2. Indicate the yearly growth rate used to develop the AADTs, what sources were used to derive to this percentage, and include in the report the output trend analysis results. It is suggested to check with the Collier Metropolitan Planning Organization (MPO) model (Lee-Collier County regional model). 	Concur; Section 6.2.2 will be expanded as suggested to provide the interim year of the project and additional growth rate information.

Comment ID	Ref./Page No.	Comment	Response
52	Section 6.2, Page 35	Provide a diagram that illustrates in detail the geometry, lane configuration and connectivity for the preferred alternative (6E), especially for the down ramp connections. Analyze down ramp merge and diverge to Everglades Safari and Coopertown Airboat Rides using Highway Capacity Software (HCS) for opening, interim and design years. State/describe the ramp terminal conditions in the design year and whether it will be signalized or free flow. Provide HCS/Synchro analysis for the ramp terminals for the opening, interim and design years.	Partial-concur; The down ramp plan sheets will be updated to include the proposed decel/accel lanes at Everglades Safari and Coopertown. A roadway typical section will be added to the Final Engineering Appendix to detail accel/decel lane configuration at Everglades Safari and Coopertown. HCS analysis of the ramp terminals will be performed during the design phase as needed to support development of the Typical Section Package. Additional description of the ramp terminal conditions will be added to the Final Engineering Appendix.
53	Section 6.3.2, Page 37	Please specify the AASHTO edition to be used in the analysis of the Design Elements and Standards.	Concur; Section 6.3.2 will be revised to specify the 2004 edition.
54	Table 6-2, Page 37	Please indicate Minimum Vertical Clearance and related Clear Zone for cases of Roadway over Roadway.	Concur; Table 6-2 will be revised to specify a Roadway over Roadway minimum vertical clearance of 16'-6" and related clear zone requirements.
55	38, C-1	According to Section 8.4.2 and Table 8.1.1 of the FDOT Plans Preparation Manual - Volume 1, the proposed 5-foot paved shoulder meets FDOT requirements for adequate on-road bicycle facilities for all types of work beyond one mile of an urbanized area. Please note a minimum of 5 feet of clear width between the travel lane and the face of a vertical obstruction such as a guardrail, curb or other roadside barrier is required. Any drainage inlets located within the paved shoulder shall be bicycle safe inlets. The Tamiami Trail corridor is the alignment for the proposed River Of Grass Greenway (ROGG). The DEIS contains no engineering evaluation regarding viable location, design, detailed construction cost, or constructability of this proposed 10-12 ft shared use path which is proposed along Tamiami Trail in Collier and Miami-Dade Counties. It appears this multi-use facility would need to be designed as part of the Next Steps project in order to be consistent with the roadway and structure design and with the restoration objectives for this region.	Concur; Section 6.0 will be revised to include discussion of bicycle facilities.
56	Section 6.3.4, Page 39	The section notes "The edge of shoulder elevation will be higher than the 100-year flood elevation." Please reference Section 2.5 and include the 100-yr elevation (10.1 ft-NGVD) and the lowest shoulder elevation for the proposed profile.	Concur; Section 6.3.4 will be revised as requested.
57	Section 6.3.4, Page 39-40	The proposed water quality treatment for the roadway reconstruction is direct runoff through the paved shoulders and grassed shoulder. Please advise whether this is an acceptable method of water treatment by FDEP? Coordination with the FDEP should be documented in the DEIS/FEIS.	Information only; We are coordinating the proposed water quality treatment method with Inger Hansen of the FDEP.
58	Section 6.4, Page 39-40	Regarding the construction sequence and maintenance of traffic, the temporary asphalt on the eastbound shoulder will need to be placed in a separate, prior phase. Unless another option can be devised, this will require closing a lane and maintaining traffic with a one-way flagging operation, as is being done for current work on Tamiami Trail. The hours when this can be permitted will depend on a lane closure analysis. Attached herein are some suggestions depicting the typical construction phase.	Concur; Description will be revised to add a prior sub-phase for temporary overbuild on the eastbound shoulder. Detailed MOT plans will be developed during the final design phase and if required, a lane closure analysis will be performed.
59	Section 6.5, Page 41-42	Please elaborate on how the proposed roadway connections to the existing land uses will be developed within the existing right-of-way or if additional right-of-way will be required.	Information only; Please refer to Plates P-1 through P-29 for the limits of existing and proposed ROW as well as TCE's required to maintain connections to the existing land uses. Proposed ROW and TCE's will be added to the down ramp sheets.
60	Section 6.6.2, Page 43	The 2038 K30 was estimated at 8.07%. Based on the FDOT Traffic Forecasting Handbook, the recommended K30 range is 9.20%-11.50%. Please include the reason for using a lower value.	Concur; The 2038 K30 will be revised in accordance with the FDOT Traffic Forecasting Handbook or justification will be provided for using the lower value.
61	Section 6.6.4, Page 44-45	This section states that "Utility relocation will be integrated into the overall project construction schedule." However, the schedule does not include utility relocation.	Concur; Utility relocations will be added as an item in the construction schedule.
62	Section 6.6.4, Page 44-45	The project potentially impacts five major utilities. Please verify location of utilities in order to avoid conflicts during construction phase. It is our experience that it may require up to one year for utility relocation to occur prior and/or during the commencement of project construction.	Concur; The Utility Relocation section of the Final Engineering Appendix will be updated to provide additional discussion of the utility locations observed during construction of the 1-mile bridge project. Field verification of all utilities within the corridor will be performed during the design phase.
63	Section 7.1.1, Page 47 & 48	Please consider merging Table 7-1 on an 11"x17" page.	Concur; Table 7-1 will be merged onto one 11"x17" sheet.

Comment ID	Ref./Page No.	Comment	Response
64	Section 7.2, Page 50	Bridge Design Criteria refers to FDOT Structural Manual (January 2009) while the Roadway Design Criteria 6.3.2 refers to FDOT 2010 Standards. Please be consistent and use the latest version of the FDOT Structures Manual.	The bridge design criteria will be based on the 2010 FDOT Structural Manual, including Florida I-Beams instead of Bulb-T girders. This comment and response supersedes FDOT comment #29 from the Draft Submittal Comments.
65	Section 7.6, Page 51	Please include a statement in the Final Engineering Appendix that the wind load design methodology will be revised during Final Design as per the January 2010, or latest version, of the FDOT Structures Manual.	Concur; Section 7.6 of the Final Engineering Appendix will be updated to include the recommended statement.
66	Section 7.7, Page 51	The section infers that "spread analysis" has been performed in stating that runoff from a 4-inch per hour storm must not encroach on the lanes. No explanation of the analysis methodology or results is provided. Similarly with the use of Continuous Deflective Separation (CDS) devices, there is no explanation regarding the treatment capacity of the proposed devices and whether the proposed capacity will meet water quality treatment requirements. Please provide these analyses and explanation of evaluations performed. The referenced "Supplemental Hydraulic Modified Water Deliveries Analyses Report" was not included with this submittal; if the aforementioned information is included within, a summary of the significant findings should be provided here.	This paragraph was intended to indicate the criteria for the runoff treatment system of the proposed bridges in order to develop the cost estimate used in the EIS engineering appendix. The system will match what was used for the 1-mile bridge construction project on the east end of the study area, as described in the Supplemental Hydraulic Analyses / Drainage Report for that project. A complete drainage design including detailed spread analysis will be performed during final design of the structures. This section of the Final report will be updated to make this more clear.
67	Section 11, Page 52	The Engineering Appendix does not contain a detailed engineering cost estimate/Long Range Estimate (LRE), therefore the Department could not provide any comment on this section.	Comment noted.
68	Section 11.4, Page 53	Show the cost of the Right-of-Way (ROW) as part of the overall construction cost. Also, add the ROW cost to the Long Range Estimate (LRE)/Detailed Estimate for the preferred alternative as part of an Appendix to the Draft Engineering Report.	Non-concur; The cost of ROW is a real estate cost and will be shown in the real estate section of the EIS.
69	Plate C-2	The proposed Traffic Control Plans (TCP) are not typical, since the approaches are constructed at an angle to the existing road. It is recommended the TCP would work better if in the Phase I permanent and/or temporary embankment is built to allow for two lanes of traffic. Traffic can then remain on the existing road until the bridges are constructed and then be switched to Phase II, at which time the remaining portions of the Typical Section can be constructed. Phase III would consist of removal of all temporary items - asphalt and embankment, and completion of the work. Phase IV would consist of completion of the last lift of structural and friction courses. In addition, TCP Phasing does not include in which phase of the construction the bridge access ramps will be added to the structure.	There is insufficient width available between the L-29 Canal and the existing roadway to construct enough temporary/permanent embankment to allow for two lanes of traffic in Phase I. Due to this R/W constraint, a portion of the existing roadway must be maintained in Phase II to allow for eastbound traffic. MOT Phasing shown in the Draft Final Engineering Appendix specifies constructing the bridges, bridge approaches and down ramps during Phase II (page 40 of report).
70	Plates S-1, S-2 Estimates	Refer to FDOT comment 39 from the November 12, 2009 comment letter to the Engineering Appendix Draft: "Four Florida Bulb T (FBT) 72 beams are proposed for all the bridges with span length 99.15 ft. Has Florida I-beam been considered and compared in cost estimate?" Based on your response to this comment that this information was obtained from Appendix D of the 2005 RGRR/SEIS document, please be advised that these estimated costs can only be used for a comparison among the 10 alternatives presented in the Tamiami Trail : Next Steps Project, and cannot be used for cost estimating or budgeting purposes for structures. AASHTO and FBT beams are no longer used for new bridge designs, per the FDOT Design Bulletin below: Temporary Design Bulletin C09-03 (July 2, 2009): Florida I-Beams (FIB's) will be used on all new Design-Bid-Build projects having both a design start date of February 1, 2009 or later and a letting date of July 1, 2010 or later. The FIB's shall be used for preliminary design and estimates of projects with projected schedules falling on or after these dates. AASHTO Beams and Florida Bulb-T Beams will no longer be used in Design-Bid-Build projects where the design start date is scheduled on or after February 1, 2009 with a letting date on or after July 1, 2010. Bridge Development Reports (BDR's) for these projects shall not include AASHTO Beams and Florida Bulb-T Beams in cost comparisons. A completely new design using Florida I-Beam (FIB) for bridges must be done for cost estimating purposes. For 99 ft. span length and girder spacing of 12 ft., FIB 45 will be adequate. Compared to the FBT 72 beams, the profile can be lowered by 27 inches, resulting in savings in both bridges and roadway embankment. Please include a statement in the Final Engineering Appendix that the structures design will utilize the January 2010, or latest version, of the FDOT Structures Manual.	FIB will be used for the structural system of the selected alternative (6E) in the final report. Because of the limited geotechnical information available at this time, we anticipate that a complete new design using FIB will be done during the development of the Bridge Development Report / Phase I Plans stage when more complete geotechnical information is available. A statement will be added to the final report stating that the January 2010, or latest version, of the FDOT Structures Manual will be used for structures design.

Comment ID	Ref./Page No.	Comment	Response
71	Plates S-2	On the plan dated 10-09-2009, the bridge storm water collection system was proposed to be located outside the exterior girder right below the gutter line, and the FP&L utilities were proposed inside the exterior girder. On the plan dated 10-16-2009, which supersedes the plan on 10-09-2009, the locations of the proposed storm water collection system and FP&L utilities were switched. What is the reason for that change? It appears the locations proposed on 10-09-2009 plan are better. Has the change been discussed with FDOT Maintenance Office? Per the FDOT Maintenance Office, the Bridge Storm Water Collection System needs to be located beneath the cantilever portion of the bridge structure deck overhang, not inside the bridge exterior girder. Please revise plan sheet S-2.	The FP&L utilities and drainage trunkline were switched on 10/16/2009 based on USACE input to match the utility arrangement used for the 1-mile bridge currently under construction. The FP&L utilities are located beneath the cantilever portion of the bridge structure deck overhang to allow for maintenance access to the large FP&L pull boxes spaced at 0.5-mile intervals. The final arrangement of the utilities will be determined during the design phase of this project.
72	Plate S-2 Bridge Section	Ratio of deck overhang to Girder spacing is such that the exterior Girder will control the Load Capacity of the Structure if the exterior and interior Girders have the same overall capacity. Since the Girder spacing is at the maximum desirable (12 feet) we recommend designing the exterior Girder such that its reserve capacity for Live Load is the same as for the interior Girders. This was done for the Mod Waters Tamiami Trail 1-mile bridge (Type IV Beam interior girders have 38 strands & exterior girders have 42 strands).	Concur; This is a final design issue and is typically done for bridge designs.
73	Plates DR-C1-DR-E4	We strongly recommend acceleration and deceleration lanes be provided for connections to the major businesses along Tamiami Trail. For instance, the figures, DR-C1, through DR-E4, showing the proposed entrance/exit ramps (down ramps) do not appear to have these lanes. Please confirm the required stopping sight distance.	Concur; Accel-Decel lanes will be added at the down ramp locations in the final report. The required stopping sight distance will be confirmed during development of the final report.
74	Plate DR-E4	Proposed profile for the entrance/exit ramps (down ramps) is not given. Since the proposed profile elevation for the new bridge will be approximately at 22.0 ft., how will the down ramp be able to cross under the bridge with enough clearance for vehicles to reach the existing roadway/new parking area that exists at an approximately elevation of 12 ft.? This problem may be avoided by constructing the entrance/exit ramps (down ramps) on the north side of the existing road and therefore providing direct access to the proposed parking area. Visitors may access the Safari facilities through a pedestrian walkway with low vertical clearance. In order for traffic to turn into the entrance/exit ramps (down ramps), the pavement will have to be widened at the intersection to create a turn lane. This concept would likely reduce the impact to the environmental sensitive area to the south of the bridge, by utilizing the existing road to approach the proposed parking area.	The bridge profile will be adjusted to maintain the minimum required vertical clearance of 16'-6". Down ramp profiles will be included with the Final report.
75	Plate DR-C5	See comment #74 for Plate DR-E4	The bridge profile will be adjusted to maintain the minimum required vertical clearance of 16'-6". Down ramp profiles will be included with the Final report.
76	Plans C-1, C-3, C-4, S-1 through S-4	There are not typical section showing the bridge access ramps.	Concur; A bridge access ramp typical section will be included with the Final report.
77	Plans C-3, C-4, CP 301, CP 302, CP 303 and CP 304	The profiles shown are "typical approaches" with stationing unlike the stationing provided in the typical sections. However the typical sections do not provide elevation information for the Profile Grade Line (PGL), edge of shoulder or bottom of base. Correspondingly it is difficult to accurately verify elevations at the lowest point of the proposed profile. It is recommended that an elevation range to the PGL and edge of shoulder be added for each cross section on CP 301 through CP 304. Also recommend is noting the Control Water Elevation (CWE) and 100-yr elevation in addition to DHW on each typical section sheet.	Typicals located on CP-301 to CP-304 are from BASE PLANS which is currently under construction. The proposed typical section for this study is located on plate C-1 with the DHW noted. The suggested elevation ranges will be added to this typical section.
78	P-3	The reverse curves (Tamiami 2 and 3) will require superelevation (0.023 for an 8,200' radius). The length of the curves should be a minimum of 500 ft. long due to small delta and the tangent length between the curves should be a minimum of 300 ft. Please check geometry criteria for curves: Tamiami 4 and 5, Tamiami 6 and 7, Tamiami 8 and 9, and Tamiami 10 and 11.	1) Superelevation was considered as per the PPM and is shown in the typical transition detail on Plate C-4. 2) The minimum length criteria of 400 ft as stated in table 2.8.2a of PPM volume 1 was used. The Tamiami corridor is considered an environmentally restrictive area, therefore the 500-foot criteria was not used. 3) A transition rate of 225:1 and an approximate tangent of 200 feet is provided between reverse curves.

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Florida Department of Environmental Protection			
N/A	N/A	Impacts to wetlands associated with Alternative 6e are predicted to be 59.22 acres of permanent impacts and 42.85 acres of temporary impacts (102.07 acres of impact total). The area of pavement proposed to be removed under Alternative 6e to allow for flow under the bridges is approximately 50 acres. The EA states that the "areas of pavement to be removed to allow flow under the bridges would be restored to wetland grade and planted with native wetland vegetation." The Draft EIS goes on to state that these efforts would be considered as partial mitigation for the project impacts. Additional information (i.e., monitoring of mitigation efforts, ratio of proposed mitigation, invasive species control, etc.) associated with these areas will be required to determine whether the mitigation for the proposed wetland impacts are considered sufficient, appropriate and ultimately successful in the absence of an operational plan that would offset the project's long-term effects.	A site specific field evaluation (i.e., UMAM) will be conducted in coordination with FDEP and other relevant agencies during the permitting stage of the project. During the permitting process, it will be determined, in coordination with the permitting agencies, if the removal of pavement will serve as mitigation for the project and to what extent. If an operational plan has not been developed at the time of construction of the Tamiami Trail Modifications: Next Steps project or if the proposed operational plan does not adequately provide for full self-mitigation of the project, the NPS will develop an alternative mitigation plan in coordination with the permitting agencies.
N/A	N/A	The Draft Environmental Impact Statement (EIS) did not provide a site specific wetland assessment to determine environmental impacts, but relied on a table top analysis derived from the Uniform Mitigation Assessment Method (UMAM) done for the Tamiami Trail Pilot Swales project. Please note that a site specific field evaluation (i.e., UMAM) should be conducted in coordination with the Department to satisfy future permitting requirements.	A site specific field evaluation (i.e., UMAM) will be conducted in coordination with FDEP and other relevant agencies during the permitting stage of the project. A footnote has been added to the FEIS to clarify this commitment.
N/A	N/A	In order to completely realize the environmental benefits expected from the proposed project, it is necessary for an operational plan to be developed that will successfully take advantage of the hydrologic connectivity provided by the proposed bridges. It is anticipated that the preferred alternative, in combination with an operation plan that takes advantage of this improved flow, will enhance wetlands and possibly offset the permanent and temporary loss of wetlands. However, the Draft EIS acknowledges the uncertainty surrounding proposed benefits in the absence of such an operational plan. In light of this, an alternative mitigation plan is being developed to offset the loss of the observed wetland impacts, both permanent and temporary, caused by construction of the alternative. The Department requests that any mitigation plan be coordinated with the Department to ensure that the proposed plan is consistent with Department Rules and Statutes.	If an operational plan has not been developed at the time of construction of the Tamiami Trail Modifications: Next Steps project or if the proposed operational plan does not adequately provide for full self-mitigation of the project, the NPS will develop an alternative mitigation plan in coordination with the FDEP.
N/A	N/A	The Department recommends a closer evaluation of the eastern bridge segment proposed under Alternative 6e. This suggestion is based on the proximity to the northern boundary of the Tamiami Trail East Wood Stork Colony. This Colony is a rookery that supports both state and federally listed species. The Department suggests ongoing coordination with the U.S. Fish and Wildlife Service, as well as the State of Florida's Fish and Wildlife Conservation Commission, to identify whether potential impacts to the Tamiami Trail East Wood Stork Colony and the rookery have been fully determined.	Coordination with the FFWCC and the USFWS is ongoing. All issues involving all threatened and endangered species, including the wood stork will be resolved with these agencies before the NPS publishes the FEIS or ROD.
N/A	N/A	The proposed 0.7-mile eastern bridge segment, a component of the preferred alternative, is in close proximity to the L-31 North Canal and in a relatively low topographic location. As noted in the Draft EIS, seepage concerns have been identified in association with this segment. Park staff has determined that a seepage evaluation would be necessary to evaluate seepage impacts associated with constructing a bridge between the existing Tamiami Trail Bridge and the S-334 Structure. Prior to moving forward with any construction, a seepage analysis should be undertaken to determine potential seepage impacts of the proposed project. The cost of the additional seepage management measures should also be considered when evaluating cost effectiveness between the alternatives.	This project only addresses the construction of the bridge and road infrastructure along Tamiami Trail. A seepage management study will be conducted at a later date during the final design phase of this project.
N/A	N/A	The Draft EIS concludes that for all of the action alternatives short-term water quality impacts in Northeast Shark River Slough are expected to occur during project implementation. These impacts are expected to result in temporary increases in total phosphorous (TP), total suspended solids (TSS) and turbidity in the surface waters adjacent to bridge construction sites. Best Management Practices have been proposed to minimize impacts to water quality resulting during construction and maintenance-related activities. The EIS also reports that "Based on the results of the S-12D Flow-way Maintenance Plan water quality monitoring and the scope of the bridging projects, it is anticipated that the water quality impacts resulting from construction-related activities for all bridging alternatives would be adverse, local, minor, and short-term." Further qualification should be provided as to what these water quality impacts are expected to be.	Additional language will be added to the FEIS to clarify the potential water quality impacts of the proposed project.

Comment ID	Ref./Page No.	Comment	Response
N/A	N/A	The Draft EIS states that a selected culvert set would be blocked during construction to avoid excess turbidity. Please provide a detailed analysis of the potential impact that blocking of the culverts during construction may cause (Page 2-20).	This statement has been removed from the FEIS. Since the blocking of culverts will be dependent upon the final design specifications of the project, it is not yet known whether it will be necessary to block culverts during construction of this project. Therefore, if it is necessary to block culverts during construction, the impacts of such action will be addressed during the permitting phase of this project.
N/A	N/A	The Department suggests looking at swales and/or shallow stormwater treatment areas along the old portion of the Tamiami Trail to address runoff from impervious surfaces. Each of the bridges will require long stretches of approach ramps where excess runoff is expected occur. These areas, as well as the bridges, will be required to incorporate the treatment and treatment capacity for runoff prior to it being discharged. Shallow swales or wetland treatment systems could be considered along the north end of the ramps, in the footprint of the old roadway.	<p>Runoff from impervious bridge sections will have treatment through CDS (Continuous Deflective Separation) units on either side of each bridged section as explained in Appendix A - Engineering Report: "Bridges and down ramps will include a runoff treatment system as described in the Supplemental Hydraulic Modified Water Deliveries Analyses Drainage Report. Runoff from a 4-inch per hour intensity storm must not encroach on the travel, turning or auxiliary lanes adjacent to barrier walls. The bridge deck drainage comprises four independent systems that collect and convey storm runoff for the southwest, southeast, northwest and northeast segments of the bridge. Each system consists of scupper drains at approximately 200-foot spacing and two shoulder gutter inlets. The scupper drains are connected to drainage pipes that are hung from the bridge decking on the north and south sides of each bridge. The shoulder gutter inlets and scupper drains are connected to CDS (Continuous Deflective Separation) units constructed on the adjacent roadway approach segments where water quality treatment takes place prior to discharge through minimum 24-inch outfall pipes. Two CDS units will be installed at each bridge and down ramp touchdown point. The final design of the drainage system will use the Interconnected Pond Routing (ICPR) computer model to simulate the proposed conditions of the four independent treatment systems for each bridge. Runoff from the roadway pavement on the precast arch-type bridge culverts flows off the road and across a six-foot wide grass strip prior to discharge. Runoff is discharged into the adjacent canal on the north side of the roadway or into the wetlands on the south side after passing through scuppers on the precast arch-type bridge culvert barrier walls."</p> <p>Other BMPs such as bridge sweeping will also be considered for minimizing contaminants in the runoff. Thus, a wetland system in the footprint of old roadway may not be needed for runoff treatment and it would function better as natural marsh system. There are also some concerns for conversion of old roadway into runoff treatment area, such as:</p> <ul style="list-style-type: none"> • Compatibility with future projects (DECOMP), • Invasion of exotics in the disturbed area, • Management and maintenance (Which agency?), • Design, cost and long term viability, • Erosion from canal water and sedimentation downstream.

Comment ID	Ref./Page No.	Comment	Response
N/A	N/A	Chapter 3 of the Draft EIS addresses existing water quality conditions that may affect the proposed project. As noted in Chapter 3, the 12-month flow weighted mean TP concentration at inflows to the ENP through Shark River Slough have achieved the interim and the long-term TP concentrations for inflow to the Park since the limits were put into effect by the United States v. South Florida Water Management District, S.D. Fla. Case No. 88-1886 (a.k.a. the Settlement Agreement). However, as noted, the TP concentrations for water year 2008 and 2009 were equal to or close to the limits. Modifications to water deliveries may reasonably be expected to result in non-compliance. A comprehensive analysis of hydrologic modifications and their effects on water quality shall be required by the Department in order to ensure any modification to the delivery of water from the proposed project will not result in a violation of water quality standards.	The Water Quality section of the EIS has been updated.
N/A	N/A	Regarding water quality and Dissolved Oxygen (DO), one item that should be taken into account is that concentrations in the Everglades routinely fall below the 5.0 mg/l state Class III water quality criteria (Rule 62-302.530, F.A.C.) due to natural background conditions. As a result, the Department has developed a Site Specific Alternative Criteria (SSAC) for DO within the Everglades Protection Area, which includes discharges to the marsh within Everglades National Park. In order to determine whether DO concentrations are in compliance with water quality standards, the EIS should include an evaluation of the measured DO concentrations using the SSAC.	The Water Quality section of the EIS has been updated.
N/A	N/A	It is important to note that the NPS concludes that the cumulative impacts from any of the action alternatives will not detract from the water quality benefits anticipated from current and future projects associated with the Modified Water Deliveries Project (MWD) and the Comprehensive Everglades Restoration Plan (CERP). The NPS states that "It is expected that the total cumulative impacts to water quality given the action alternatives of the proposed project combined with related projects would be beneficial and long-term." However, long-term effects to water quality resulting from operations are claimed to be unknown since an Operational Plan has not yet been developed for this project (page 4-17). The Department believes that it is critical to evaluate and assess potential water quality impacts as part of evaluating the feasibility of providing additional bridge length. Specifically, the potential impacts of increased flow and potential increased nutrient loading.	The Water Quality section of the EIS has been updated.
N/A	N/A	The Draft EIS recognizes that there is a potential for nutrient impacts to the Park with the increased flows from the proposed bridge alternatives, yet these impacts are not quantified in the Draft EIS. Chapter 4 of the Draft EIS makes little mention of environmental consequence of long-term water quality impacts associated with this project as a specific operation plan has not yet been developed. Even though the evaluation does not attempt to develop a specific operation plan, there should be an evaluation of potential impacts based upon any increase or modification to flow that may be reasonably expected to exist at the time of project implementation. For example, it is anticipated that the Everglades Restoration Transition Plan, which is also in the NEPA process and is currently expected to have a final record of decision issued by the U.S. Army Corps of Engineers in January 2011, would have operational modifications. The Department believes that these modifications should be evaluated as part of the EIS since these conditions are reasonably expected to exist upon implementation of any of the alternatives contemplated in the Draft EIS.	The Water Quality section of the EIS has been updated.
N/A	N/A	The potential increases in the TP concentration to the Park should be analyzed, so that all stakeholders have a clear understanding of the potential impacts, risks and uncertainties associated with moving forward with any alternative. Water quality effects from the project, whether short-term or long-term, should not conflict with the requirements of State law or the Settlement Agreement. A determination regarding consistency with Florida Statutes will be made when the Department receives and reviews an application for the construction and operation of the proposed project pursuant to its authority under Chapters 373 and 403, Florida Statutes, and under the authority delegated to the State under the federal Coastal Zone Management Act.	The Water Quality section of the EIS has been updated.
N/A	N/A	A more detailed discussion is expected during the permitting process regarding temporary impacts of construction on water quality and the justification for a temporary mixing zone for elevated turbidity levels within the Park.	An appropriate level of documentation (to be determined in coordination with the permitting agencies) will be provided to all relevant agencies during the permitting phase of the project.
N/A	N/A	The second sentence "It is possible to complete this evaluation without knowing precisely whether artifacts or significant sites are present on the properties."Should the sentence read "it is not possible (Page 2-14, section 2.3.7)"?	Text has been removed.

Comment ID	Ref./Page No.	Comment	Response
N/A	N/A	It is stated that climate change and the resulting sea level rise are affecting all of South Florida, especially low-lying areas such as Everglades National Park (Park), and therefore will be addressed as part of this EIS (page 4-9). On page 4-10 it is stated that sea level change will be monitored and evaluated and its impacts on the Park's landscape will be predicted. However, it is unclear how impacts caused by sea level change have been taken into consideration in the comparison of the alternatives for this draft EIS.	Climate change and sea level rise have been analyzed in the DEIS per the most recent guidance from the CEQ. NPS will check the language in the document regarding climate change to ensure clarity and consistency.
N/A	N/A	The Department recommends integrating wildlife corridors into the bridge flowway design. Looking at the Panther data provided in the report, it becomes clear that the existing road and canal is a barrier to Panthers migrating and moving from the Park north to the WCA 3. Recognizing that the ultimate plan is to connect the Water Conservation Areas and the Park, wildlife crossings should be integrated into the design of any new bridge provided.	Wildlife crossings will be considered during the final design phase of this project and impacts will be addressed during the permitting phase of the project.
N/A	N/A	Proposed modifications to Tamiami Trail are adjacent to the northern edge of ENP and span eastward from the L-67 to the L-30 levee. This study area, identified as the Tamiami Trail Corridor, has been assigned a high priority ranking on the State's Multi-use Trail Network Opportunity Map. The Department suggests looking for opportunities to include such passive recreational amenities as part of the project design at a later date, regardless of the final selected alternative.	Additional public access will be addressed as part of the Park's General Management Plan. Language regarding additional public access will be added to Section 1.5.3 (Issues Not Addressed in this Plan) of the FEIS to clarify this.
N/A	N/A	Provided the necessary environmental approvals and permits can be obtained, the Department requests that consideration be given to the inclusion of a nonmotorized bicycle and pedestrian pathway, separated from vehicular traffic. This would ensure a cross-state alternative transportation corridor that would expand visitor use; encourage ecotourism; and reduce carbon emissions.	The NPS supports the addition of a multi-use/bicycle path as a part of the Tamiami Trail Modifications: Next Steps Project. A discussion of the significant public support for a multi-use/bicycle path will be included in the FEIS. A recommendation to consider a multi-use/bicycle path in the design phase of the project will also be included in the FEIS.
N/A	N/A	Fencing, as used successfully along other Florida highways to protect wildlife, should be evaluated to protect animals from crossing on un-bridged areas and divert them to a safe crossing that could be provided as part of this project.	Fencing will be considered as a possible BMP for protection of wildlife. The following BMP has been added to the document: "Erection of fencing along un-bridged sections of roadway will be considered to protect animals from crossing over the roadway and divert them to a safe crossing under one of the bridged sections of the roadway."

Comment ID	Ref./Page No.	Comment	Response
Florida Department of State			
PEPC 654	N/A, N/A	The DOS concurs with the NPS' finding that the proposed undertaking will have an adverse effect on historic properties. The procedures outlined in 36 CFR 800.6 regarding SHPO consultation and development and evaluation of alternatives or modifications that avoid, minimize or mitigate adverse effects must, therefore, be followed.	Agree, the NPS will follow all of the procedures outlines in 36 CFR 800.6. Coordination between NPS and SHPO for this project is ongoing.

Comment ID	Ref./Page No.	Comment	Response
Florida Fish and Wildlife Conservation Commission			
PEPC 651	N/A	<p>Issues and Recommendations</p> <p>The FWC has fish and wildlife and land management responsibilities for WCAs 2 and 3, which are managed as the Everglades and Francis S. Taylor Wildlife Management Area. We fully support actions that will restore hydropatterns that improve current conditions that affect fish and wildlife and their habitats; however, we have identified the following issues that should be addressed during the planning process for this project.</p> <p>We also ask that the NPS address our prior relevant concerns and recommendations on the Tamiami Trail projects. Our original concerns on raising the height of Tamiami Trail were conveyed to the COE in a letter (enclosed) dated June 13, 2000, to James C. Duck. Subsequently, we have relayed additional detailed comments and recommendations on the various Tamiami Trail features directly to the COE through several Fish and Wildlife Coordination Act Report (FWCAR) documents as well as through the Florida State Clearinghouse. This correspondence includes a preliminary supplemental FWCAR (enclosed) dated August 11, 2005; a letter (enclosed) dated March 17, 2004, to James C. Duck; a preliminary FWCAR (enclosed) dated June 24, 2003, on the preliminary draft GRRJSEIS; a Planning Aid Letter (PAL; enclosed) dated February 26, 2001; a letter (enclosed) dated September 14, 2001, to Col. James G. May; and letters (enclosed) via the Florida State Clearinghouse dated March 4, 2008, and May 14, 2008, to Lauren Milligan; and another dated January 16, 2002, to Jasmine Raffington.</p> <p>Water management operations: We note that an operational plan for water levels in the L-29 canal has not yet been developed for this project, and the DEIS states that full realization of project benefits is dependent upon this operational plan. Additionally, seepage concerns and the operational aspects of how and when future flows would be delivered under the bridges were not addressed in the DEIS. We recommend that these operational aspects be addressed prior to the release of the final EIS for this project.</p> <p>State-listed species: We recommend taking all state-listed fish and wildlife species into account when analyzing a project and its alternatives. Doing so is necessary for us to concur with any determination of consistency under the Coastal Zone Management Act/Florida Coastal Management Program that NPS may provide in the future. The following species from the state list of endangered species (E), threatened species (T), and species of special concern (SSC) potentially occur within the project area and/or could be impacted by the project: American alligator (<i>Alligator mississippiensis</i>, SSC), Florida burrowing owl (<i>Athene cunicularia floridana</i>, SSC), roseate spoonbill (<i>Platalea ajaja</i>, SSC), limpkin (<i>A. ramus guarauna</i>, SSC), little blue heron (<i>Egretta caerulea</i>, SSC), snowy egret (<i>Egretta thula</i>, SSC), tricolored heron (<i>Egretta tricolor</i>, SSC), white ibis (<i>Eudocimus albus</i>, SSC), wood stork (<i>Mycteria americana</i>, E), snail kite (<i>Rostrhamus sociabilis plumbeus</i>, E), Florida manatee (<i>Trichechus manatus latirostris</i>, E), Cape Sable seaside sparrow (<i>Ammodramus maritimus mirabilis</i>, E), Florida panther (<i>Puma concolor coryi</i>, E), and Everglades mink (<i>Mustela vison evergladensis</i>, T). In cases where state-listed species may be impacted, we recommended compliance with all federal and state regulations and recommendations concerning each species.</p> <p>The Everglades mink approaches the eastern limits of its distribution in the project area. The Everglades mink is known to utilize all types of shallow wetland habitats, but exhibits a decided preference for swamp forest habitat. Smith (1980) found Everglades mink to be most abundant around old agricultural canals, levees, and the Tamiami Trail roadway. Although road-kill data indicate that minks historically occurred along the entire length of the roadway, a higher incidence of mortality tended to occur where old agricultural canals and/or spoil areas intersected the Tamiami Trail. Consequently, these man-made upland habitats are more likely to be used by the Everglades mink for hunting and den placement. Bridges "A1 and B2" and "G 1 and II" in alternative 6e (Figure 2-5) would traverse old agricultural canals that may be affected by road removal and/or bridge construction. An experienced biologist should survey areas near construction sites with suitable</p>	<p>Coordination has been conducted with the FFWCC and USFWS and updated information has been incorporated into the EIS and the Biological Opinion issued for this project.</p>

Comment ID	Ref./Page No.	Comment	Response
		<p>potential habitat prior to the initiation of construction activity to help determine whether any mink are present in the study area, and if any den areas may be present. Ideally, the survey should be done during the mink mating season which extends from September through November. We ask that FWC be notified if any mink are detected.</p> <p>Snail kites have been documented nesting within WCA 3B as recently as the 2010 breeding season. We note that NPS will actively monitor for snail kite nesting during the construction of the project and will implement the U.S. Fish and Wildlife Service's (USFWS's) snail kite management guidelines if any nesting sites are detected.</p> <p>The Florida burrowing owl inhabits open native prairies and cleared areas that offer short groundcover; these include pastures, agricultural fields, golf courses, and vacant lots. Burrowing owls have also been associated with unnatural elevated areas such as road berms, canal banks, and levee sides. The FWC recommends that an experienced biologist survey areas near construction sites with suitable potential habitat prior to the initiation of construction activity to help determine whether any burrowing owl nest burrows are present in the project area. We ask that the FWC be notified if any burrows are detected.</p> <p>Modification of the roadway could result in work that affects the surrounding canals, in which manatees have been observed. The FWC recommends adherence to the "Guidelines for Manatee Conservation during Comprehensive Everglades Restoration Plan (CERP) Implementation" prepared by the CERP Interagency Manatee Task Force in October of 2006 (CERP Manatee Task Force 2006). The document recommends that careful consideration be given to any project implemented that either alters manatee accessibility or adds new structures that may result in physical harm to or entrapment of manatees (Section III (B)). The manatee conservation guidelines include protection measures to avoid adverse impacts, such as physical harm or entrapment, to manatees to be implemented during project design and construction.</p> <p>Florida panthers have been recorded within five miles of the project area on 117 occasions since 1989 (USFWS 2006). No panthers have been documented north of the Tamiami Trail in this area, however, suggesting that the roadway and/or L-29 canal may act as a barrier to panther movements.</p> <p>Wading bird nesting habitat: Bridges identified as "II" and "11" in Alternative 2a (Figure 2-2) and as "AI and B2," "G 1 and II," and "11" in Alternative 6e (Figure 2-5) would be constructed close to three wading bird colonies (Tamiami West, Tamiami East, and Tamiami East 1) located immediately south of the Tamiami Trail. State-listed wading birds, including white ibis, snowy egret, tricolored heron, little blue heron, and wood stork, are known to nest in these colonies (Cook and Kobza 2009, Frederick 1995). The removal of woody colony vegetation could negatively impact these colonies. While Tamiami East and Tamiami East 1 are currently small in terms of size and abundance, these colonies could become more productive once anticipated increased flows to NESRS are realized and the hydroperiod of the area increases. Additionally, alternative 6e would result in the removal of colony vegetation at Tamiami West, a larger and consistently active colony that supported 1,300 wood stork, 5,000 white ibis, and 300 tri-colored heron nests in 2009 (Cook and Kobza 2009).</p> <p>The Tamiami Trail road-kill survey conducted by the FWS in 2002-2003 documented the mortality of a wood stork and a snowy egret along the current roadway (USFWS 2004). With elevated bridges, wading birds departing from colonies or from nearby foraging sites would be required to gain additional altitude to avoid passing traffic. This could lead to a slight increase in risk for wading birds being struck by passing traffic.</p> <p>The DEIS states that guidelines for wood stork protection would be followed during all phases of project construction. We request that appropriate precautions are taken to avoid disrupting the nesting efforts of state-listed wading birds that also use these same colonies. The FWC has developed set-back distances to protect nesting bird colonies from human disturbance (Rodgers and Smith 1994). These guidelines establish a minimum 100-meter recommended set-back</p>	

Comment ID	Ref./Page No.	Comment	Response
		<p>distance around mixed wading bird colonies. Human disturbance should be restricted around the colony site during the wading bird nesting season and during roosting periods.</p> <p>We ask that the NPS reconsider the necessity of the easternmost bridge in the selected alternative, given the potential impacts to nesting wading birds as well as to a lack of an effective seepage management plan for the L-31 levee (see below).</p> <p>Wildlife passage improvements: The DEIS states that all action alternatives would result in an increase in ecological connectivity, and that the construction of bridges would provide much improved access for species to move between habitats in the WCAs and NESRS as well as reduced wildlife mortality along the Tamiami Trail; however, we note that there are no wildlife crossing features associated with the planned bridges. We have previously expressed concerns regarding wildlife crossings in our prior letter to the COE concerning the construction of the one-mile bridge for MWD.</p> <p>The Tamiami Trail road-kill survey conducted by the USFWS in 2002-2003 documented 991 road-killed vertebrates along two miles of selected transects over 13 monthly sampling periods (USFWS 2004). The Everglades mink, which has been documented from roadkills along this section of the Tamiami Trail (Smith 1980), is particularly vulnerable to highway-related mortality (Humphrey 1992). To reduce road-related mortality of the Everglades mink and other riparian wildlife, we recommend that underpass shelves be incorporated into bridge and culvert designs. Wildlife underpass shelves have proven to be effective in promoting the safe passage of three mustelid species in The Netherlands (Veenbaas and Brandjes 1999). The installation of wildlife crossing shelves would create a safe passage corridor for large mammals (including the endangered Florida panther), medium-sized mammals, and other wildlife that use the L-31 levee and the tree-lined agricultural canals within WCA 3B. A shelf width of 10 to 15 feet placed at an elevation slightly above the mean high water line would accommodate the large and small animals. A shelf width of 2 to 3 feet would be sufficient to accommodate the Everglades mink.</p> <p>The DEIS states that permanent removal of peat soils (ranging from 8 to 51 inches in depth) would occur for all action alternatives. Absent wildlife shelves or other elevated passage features, the deeper water below the bridged expanses where soil removal occurred would not provide for the safe passage of terrestrial and semi-aquatic animals as stated in the DEIS. We recommend that those areas beneath the bridge where terrestrial wildlife are most likely to occur, in particular at the intersection of the agricultural canals within WCA 3B, retain their peat soil and the additional elevation and vegetative cover it provides.</p> <p>We would be glad to work with ENP to determine the best locations for crossing features or prioritize locations for leaving the existing peat soil in place to facilitate animal passage beneath the planned bridge expanses.</p> <p>Recreational fishing: The DEIS states that boat ramps would experience either no longterm impacts or very negligible long-term impacts to visitor use and experience as a result of any of the action alternatives. We recommend that particular consideration be given to how increased water levels in the L-29 canal may impact the existing function and accessibility of our boat ramp that is located between the S-333 and S-334 structures and provides access into the L-29 canal. We recommend that actions are identified to provide continued public utilization of this ramp. The increased connectivity of the L-29 canal to a long hydroperiod marsh has the potential to improve fishing in this canal segment, and this boat ramp may become even more valuable in the future.</p> <p>Other related projects: We recommend consideration be given to the Pilot Spreader Swale project and its potential impacts to this project. There may be overlap between implementation and monitoring of the pilot test and the construction schedule for the proposed bridges. In addition, if flows can be adequately handled by the spreader swales, all of the bridges in the preferred alternative may not be necessary.</p>	

Comment ID	Ref./Page No.	Comment	Response
		<p>The easternmost bridge in alternatives 2a and 6e, identified as J1 in the DEIS, is in close proximity to the L-31 levee. We note that it may exacerbate seepage across the L-31, and increase the need to operate the S-356 pump station to return the increased seepage back to the L-29 canal. This additional pumping at S-356 during high water events in WCA 3 may compete with the S-333 or S-355 structures and prolong the duration of such events. Conversely, such bridge placement could contribute to excessive dry downs in southeastern WCA 3B during severe droughts (assuming removal of the L-29 levee under the Decpartmentalization project under CERP), particularly if no effective seepage barriers are in place along the L-31 levee. In addition, we understand that the project delivery team recommended exclusion of the easternmost bridge from the preferred alternative due to seepage concerns. We recommend that ENP provide more information regarding these concerns and the incremental ecological benefits to be derived from the construction of the easternmost bridge.</p> <p>Summary</p> <p>In summary, the FWC supports the ecological benefits expected from this project. The NPS has not appeared to have provided a consistency determination under the Coastal Zone Management Act/Florida Coastal Management Program with this DEIS; therefore, we are not obligated to provide concurrence at this time. We note that when the NPS does provide a consistency determination, we will need to be able to review an analysis of the impacts not just to federally listed fish and wildlife species, but also impacts to those listed by the State of Florida in order to concur with their determination</p>	

Comment ID	Ref./Page No.	Comment	Response
South Florida Water Management District			
PEPC 648	N/A	<p>There are two substantive concerns that that were common among SFWMD reviewers. The first deals with potential impacts of the proposed project on water quality within ENP. The draft summary report and EIS emphasize the point that under current conditions, total phosphorus concentrations are often very close to violating the phosphorus limits specified by the Consent Decree. However, the documents do not adequately discuss how the project will be implemented to avoid exacerbating this issue. For example, the project may need to be phased and sequenced in coordination with other planned restoration efforts to avoid water quality violations that would result from additional flows and phosphorus loading. If ENP desires to implement the entire project in the near-term, additional treatment capacity may need to be incorporated into the project, at Federal expense, to avoid causing a violation, or it may be necessary to modify the Consent Decree.</p> <p>The second common concern identified by SFWMD reviewers was the lack of a draft operating plan for the project. The discussion of cumulative effects and benefits of the project are based on an assumed operating plan to be developed in the future. However, there is no discussion of when or under what authority this operating plan will be developed. There is no discussion of interim project operations in the event that the conveyance features of the Modified Water Deliveries Project are not completed on schedule. Without a better understanding of the potential flexibility in the operating plan for this project, it is difficult to evaluate potential effects on the existing C&SF Project and the South Dade Conveyance System features. For example, if it is assumed that the project operations would rigidly adhere to a 9.7 foot design maximum operating stage in the L-29 Canal, there would likely be significant impacts to WCA-3B and urban areas in southwest Miami Dade County due to the significantly higher canal operating levels unless other mitigating measures were implemented. It is also difficult to determine the impacts and constraints that would be placed on formulation of future Everglades restoration projects under CERP and the State's Long-Term Plan if this project is authorized and is subsequently required as a "without project condition". While SFWMD supports the goal of increasing stages and flows in the southern Everglades, we are not prepared to fully adopt a 9.7 foot stage in the L-29 Canal as the maximum design operating stage without further analysis of the potential collateral impacts on the environmental resources in WCA3B and regional flood control. It seems prudent that development and evaluation of interim and final operating plans would be necessary to determine whether the proposed 9.7 foot design maximum can be achieved. It is recommended that the final documents include a discussion of the assumed operating conditions that resulted in the specified impacts and benefits, as well as a commitment to develop an interim and final operating plan during subsequent design analyses, and to adjust the assumed operating parameters (e.g., 9.7 ft. stage) based on these subsequent analyses.</p>	<p>In response to the first substantive concern provided by the SFWMD, the potential impacts of the proposed project on water quality within ENP, additional language regarding potential water quality impacts will be added to the FEIS. In response to the second substantive concern, the lack of a draft operating plan for the project, NPS will clarify the following. This project only addresses the construction of the bridge and road infrastructure along Tamiami Trail. An operational plan is not included as a part of this project. Therefore, when water operations are addressed at a later date, the operational plan will have to be developed in association with the proposed project's infrastructure. It will be noted in the FEIS that "full realization of project benefits is dependent upon an operational plan that utilizes the structural capacity of the preferred alternative." The DHW of 9.7 is not an operational constraint and is not intended to be an operational constraint. The difference between the stage water level and the DHW for this project will also be clarified in the document to avoid any further confusion between the 9.7-foot DHW and the stage water level. Responses to the detailed staff comments are provided in the attached spreadsheet.</p>
N/A	Page v - Executive Summary; 2nd Paragraph and Page 2-3 ; 2nd Paragraph Section 2.2	Editorial suggestion: Through further discussion and refinement other project alternatives emerged and if the adjustment were small, the they were small adjustments to an existing alternative there- were given a lower case letter designation (e.g. a, b, or c) depending on the order in which they were developed.	Done. Revision made in main document as well.
N/A	Page vi - Executive Summary; 1st Paragraph	Editorial suggestion: The lengths of the bridges, transition areas between the bridges and the roadway, and the roadway are separated in the descriptions. Please note that Alternative 3 was eliminated per direction of the USACE. <u>Make a statement as to why it was requested to be eliminated.</u>	Disagree on editorial change. Reasoning for elimination has been added to text.

Comment ID	Ref./Page No.	Comment	Response
N/A	Page 2-16 Section alternatives Considered and Dismissed	Recent studies by ENP concerning placement of swales downstream of the existing TT culverts suggest a significant improvement can be achieved in the volume of water flow from L-29 to ENP utilizing the existing culverts. This would suggest that smaller bridges in combination with the swales could provide the target flow of 6,200 cfs. It would be prudent to acknowledge this new information and discuss why an alternative using a combination of swales and existing culverts was not considered.	Culvert-only alternatives were evaluated and dismissed in previous MWD projects and in this project due to their inability to provide the volume, distribution, and timing of flows required for restoration of NESRS. According to the technical analysis in the SEIS for the 2005 RGRR, without more bridging "Future volume and culvert stage increase for the L-29C will reduce the roadway base clearance and likely cause roadway failure." Moreover, the USACE concluded in the 2005 RGRR that culvert-only alternatives would result in "adverse flooding impacts to adjacent properties and WCA-3B." The 2009 Omnibus Act specifically directed the NPS to investigate additional bridging to restore more natural water flow and improve ecological connectivity between WCA-3 and Everglades National Park. A culvert-only alternative would not provide natural water flow conditions or ecological connectivity.
N/A	Page 2-26 Section 2.9 - 3rd Paragraph	<p>"Alternative 6e most closely meets the project objectives and the National Park Service mission by having the highest total importance value after summing the importance scores for each of the eight factors for each alternative." The eight factors are not listed and should be described. Appendix B identifies and describes these factors on page 17. It would be useful to reference this page. The performance measures identified for the project are also the factors used in the CBA scoring. It would less confusing to also identify these similarities early.</p> <p>In the following paragraph, analysis is presented from USACE (Table 2-14) which also justifies the selection of Alternative 6e as the most efficient alternative. However, the documentation of these calculations are not presented in the report. This latter analysis appears less subjectively influenced by the weighting method used in the CBA but without the supporting documentation it is not possible to make an informed decision. Recommend this information be incorporated into the report.</p> <p>The following paragraph references USACE cost benefit analysis but provides no detail description of how the USACE arrived at these calculations in the main body of the report or in the appendices. Since this information is used as supporting documentation for the 6e selection as the preferred plan, additional details should be provided.</p>	The text has been revised to clarify that the PMs are the factors that were used in the CBA. Documentation about the development of the preliminary cost analysis is included in Appendix A, Engineering Report.
N/A	Page 3-15; Last Sentence	"In addition, the plant community composition directly downstream of some of the Tamiami Trail culvert sets show evidence of nutrient enrichment with cattails pluming in some of the immediate downstream culvert pool locations (Figure 3-8)." The description of "pluming" is misleading. There are multiple factors that may contribute to the presence and dispersal of cattail within the Everglades environment. Recent research shows that cattail may also expand in response to changes in hydrology.	Text has been revised to state that "some of the Tamiami Trail culvert sets <i>may</i> show evidence of potential nutrient enrichment with cattails pluming in some of the immediate downstream culvert pool locations." While there could be other reasons for this pluming, nutrient enrichment is likely one of the causes.

Comment ID	Ref./Page No.	Comment	Response
N/A	Page 4-3; 2nd Paragraph, last sentence	<p>"Next Steps project is to provide the additional modifications to the trail needed to meet the restoration objectives of the MWD and CERP projects. No adverse environmental impacts are identified. "</p> <p>The lack of environmental impacts is predicated on broad assumptions concerning future operating conditions that have not been defined in this document. A number of operational constraints were previously identified in the 2008 Tamiami Trail LRR/EAA and these are presumed to be alleviated by the proposed 6e plan. The selection of a preferred alternative in absence of an operational plan imposes significant burden on the State and a future yet to be defined process to adopt an operational plan capable of fulfilling the benefits assumed in the preferred alternative 6e with no discernable long term environmental consequences. The history of similar projects relying on future efforts to define acceptable operating conditions commensurate with these expectations has not been encouraging. Moreover, the selection of the preferred alternative in the absence of an operational plan commits future actions in CERP or other related projects to provide the requisite infrastructure, capacity and water quality necessary to sustain these presumed benefit levels. This will result in future projects having to consider higher cost alternatives to comply with the flow expectations of the TT Next Steps project. Future proposed projects and their related operating plans will be costly and less expensive plans will be judged as circumventing the environmental benefits and purposes of the recommended TT Next Steps project.</p> <p>It is also not possible to determine if the proposed bridging and assumed design high water operating stage of 9.7 feet is consistent with Florida Department of transportation requirements to maintain adequate and safe operating conditions for the road. Reconstruction of the unbridged portions of TT is proposed to increase the road crown elevation to 12.3 ft NGVD. NSM model results were used to define a frequency of L-29 canal elevations reaching a specific peak stage in the simulated period of record that may cause concern for the road. Based on the information presented, it is not possible to determine if a storm event coupled with an operating stage of 9.7 ft would cause topping of the road surface.</p> <p>There is also a high probability of increased erosion of the L-29 canal at these higher operating stages that would lead to greater maintenance costs for the canal embankment and for the road shoulder.</p>	<p>Per language from Congress in the 2009 Omnibus Appropriations Act and per DOI guidance, this project only addresses the construction of the bridge and road infrastructure along Tamiami Trail. An operational plan is not included as a part of this project. Therefore, any impacts that may occur as a result of future water operations will be assessed as part of the operational plan.</p>
N/A	Page 4-5; 1st Paragraph	<p>"While the recommended plan of the 2005 RGRR/SEIS was abandoned due to escalating costs, and the CSOP was not finalized after selecting a preferred plan in 2006, the modeling evaluations of both plans show the potential regional benefits that can be achieved by providing increased flow capacity into Northeast Shark River Slough."</p> <p>Since the CSOP document referenced was not released to the public, it would be fitting to provide relevant portions of the document as an appendix supporting the benefit of increased conveyance via bridge openings.</p>	<p>Since CSOP was not finalized, it is probably not the best reference for potential project benefits. Also, this project only addressed the construction of the bridge and road infrastructure along Tamiami Trail. Therefore, the discussion of any other operational plan would not be appropriate. The document includes much support for the benefits of increased conveyance via bridges openings.</p>
N/A	Section 4.3 Page 4-13	<p>Impacts of the alternatives and their respective cumulative impacts are discussed in light of NPS regulations and policies. There is no assessment of the potential flood control impact differences among the alternatives considered or the potential cumulative impacts of prior projects in combination with the proposed bridge openings concerning the L-31N canal and S. Dade operations. Operations of the regional water system in this area are sensitive to water level changes within ENP and the proximity of these changes to the canal system. Although no specific water operating plan has been proposed for this project, a discussion of the potential influence on the regional canal system is warranted based on the available data and historical operations. It is particularly important that dependent projects either in the planning or construction phase be identified that will be required to compensate for any specific mitigation needed to offset potential reduced flood storage within the L-31 N and S. Dade Conveyance System resulting from the improved conveyance of water afforded by more bridging of TT. The dependent improvements would be pre-requisite for the full implementation of the TT Next Step recommended plan.</p>	<p>This project only addresses the construction of the bridge and road infrastructure along Tamiami Trail. An operational plan is not included as a part of this project. Therefore, any impacts associated with future water operations will be assessed as part of the operational plan. Flood control will also be assessed as part of a future seepage management study.</p>

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N/A	Section 4.3.2 Water Quality	<p>Recent court rulings have created uncertainty concerning the added measures that may be imposed to meet mandated water quality standards for the Everglades. There is no information or discussion of the proposed bridges and added flow benefits in light of the water quality constraints. This is in stark contrast to the text presented in the Affected Environment (chapter 3) describing the long term trends in water quality and potential for non-compliance. The document acknowledges that water quality is related to the operating plan which is undefined for this project. Without additional information it is impossible to determine if the proposed plan is implementable or can be operated under the existing or future likely water quality constraints.</p> <p>Accordingly, the flow benefits may be constrained or additional water quality treatment required to fully implement the desired levels of flow. The costs and responsibility of these requirements are undefined.</p>	The Water Quality section of the EIS has been updated.
N/A	Section 4.3.3 Wetlands	<p>The proposed higher operating levels of 9.7 feet will create a significant tail water on the outflow structures for WCA3B resulting in potentially adverse peak stages for long periods within the WCA3B marsh. This impact was acknowledged in the Final 2008 Tamiami Trail Modifications LRR and EA Engineering Appendix as stated:</p> <p>"The L-29BC acts as a stage equalizer upstream of the roadway embankment and this increased stage is then propagated into WCA-3B as water is discharged through the S-355s and potentially other passive structures (L~S) in L-29 (resulting in a stage increase for WCA-3B of ~H + ~S)."</p> <p>The current wetlands assessment does not discuss these potential impacts to WCA3B and the related environmental resources. It can be anticipated that some habitat impacts are likely as water levels in WCA3B are increased and these should be tempered with proposed measures to limit these impacts until the marsh has adapted to a new equilibrium around the higher operating water levels. This progression would affect the timing of when the desired flow rates and operating maximum could be achieved.</p>	Text has been revised.
N/A	Section 4.12 Socioeconomics	Staffs at SFWMD and ENP have previously discussed the potential impact of increased water levels resulting from TT Next Steps implementation on the S-12D communication tower owned by SFWMD. There is no mention of this need in the real estate discussion on page 4-72 or within the Real Estate Appendix G. Please provide justification why this relocation is no longer required by the project. If this relocation is still desired by ENP, the real estate appendix should reflect this requirement as justification to secure federal funding.	The Real Estate Appendix has been updated.
N/A	Real Estate - page 4-72	Construction of the new bridges and other road improvements require additional road right of way south of the existing highway. There is no discussion of the options ENP would exercise to replace park lands impacted by the new bridges and road improvements. Would the impacts fall within the ENP authority to modify the park boundary to accommodate these impacts or would Congressional approval be required? Will replacement lands be required and what lands would ENP seek to incorporate?	The project is expected to be self-mitigating. If mitigation for impacts is required, it will be conducted at Hole in the Donut (ENP). There is no intent to replace any park lands or to modify the boundaries of ENP.
N/A	Engineering Appendix; Section 6.3.4 and 7.7 Drainage and Runoff Treatment	<p>There is no description of the anticipated volume of water to be treated as runoff from the bridge surface and therefore, the adequacy of the treatment cannot be determined. A more definitive analysis will be required to obtain permits and additional retention/treatment may be required.</p> <p>This could impact the anticipated design on the collection system at the ends of the proposed bridges.</p>	The Engineering Report has been updated.

Comment ID	Ref./Page No.	Comment	Response
N/A	Engineering Appendix; Section 10 Operations and Maintenance	<p>This section identifies SFWMD as the party responsible for maintenance of the areas under the constructed bridges. These costs are not captured in the project costs as long term maintenance costs associated with this project. Without this information, there is no mechanism to secure federal funding of these costs and these costs are not currently part of the anticipated SFWMD future maintenance plans.</p> <p>Maintenance costs of the L-29 canal and control structures S-333, S-334, and S-355A1B would also be greater than current conditions under a higher operating water level as proposed with new bridging. These costs should be factored into the overall plan and the appropriate federal funding of these costs included in the project total.</p>	The Engineering Report has been updated.
N/A	Engineering Appendix; Section 12.1 Construction Durations	This section identifies a Notice to Proceed (NTP) construction start of January 2, 2013 and is dependent on the completion of the currently authorized 1.0 mile bridge project on TT. Additional dependent projects such as the Modwaters Seepage and Conveyance components should be completed prior to a NTP for the new bridge sections and an operational permit acquired for the S-356 pump station.	The Engineering Report has been updated.
N/A	Appendix A - Section 2	Much of the material currently provided in Section 2 of Appendix A provides project background, but is not directly applicable to the hydrology and hydraulic analysis performed as part of the evaluation criteria for the EIS.	The Engineering Report has been updated.
N/A	Appendix A - Section 2	An additional sub-section (2.11) of Appendix A is needed to further describe the application and assumption of terms in the manning's equation analysis described in section 2.3.3 of the main body of the EIS.	The Engineering Report has been updated.
N/A	Appendix A - Section 2	An additional sub-section (2.12) of Appendix A is needed to further describe the HECRAS application and derivation of the normalized scores described in section 2.3.4 of the main body of the EIS.	The Engineering Report has been updated.
N/A	Appendix A - Section 2	The hydrologic and hydraulic PMs used in the EIS are not described in sufficient detail in the main body or the Appendix. While I am confident that this is primarily a documentation issue (the previously performed analyses detailed in the appendix would lead to similar conclusions), it is none-the-less something that should be addressed prior to finalizing the report.	The Engineering Report has been updated.
N/A	Appendix A - Section 2	In general, the appendix provides an appropriate level of previously published background information. The conclusions drawn in the main body of the EIS are consistent with analysis performed by earlier efforts, although this is not explicitly stated.	The Engineering Report has been updated.
N/A	Appendix A - Section 2	The hydrology and hydraulic analysis described in sections 2.3.3 and 2.3.4 of the main body of the document are largely independent of the material in Appendix A, with the exception of section 2.5 (NSM) which is directly used in the development of PM3.	The Engineering Report has been updated.
N/A	Appendix A - Section 2	While the results of the NSM data analysis and RMA-2 modeling performed for the 2005 RGRR are presented in detail, no description is given of the Manning's data analysis (PM3) or HEC-RAS modeling effort (PM4) used in the evaluation criteria of the EIS is provided.	The Engineering Report has been updated.
N/A	Appendix A - Section 2	I'm not sure what the basis is for using the 0.1 fps threshold as an indicator of damaging conditions to ridge and slough environment. Some of Jud Harvey's work (2008) indicates that flow velocities of equal to or even greater than 0.1 fps (e.g. 3.3 to 6.4 cm/s) are needed for Everglades sediment entrainment. These types of conditions may be necessary under some circumstances.	The Engineering Report has been updated.
N/A	Appendix A - Section 2	Section 2.3, paragraph 1, sentence 1: revise to " ... from rainfall, from Lake Okeechobee and from upstream basins ... "	The Engineering Report has been updated.
N/A	Appendix A - Section 2	Section 2.5, paragraph 1, sentence 4: replace "NSM accounts for" with "simulated NSM conditions are an appropriate surrogate for the expected outcomes of"	The Engineering Report has been updated.
N/A	Appendix A - Section 2	Table 2.1, column headers: Should "West Brook" and "East Brook" be "West Book" and "East Book"?	The Engineering Report has been updated.
N/A	Appendix A - Section 2	Image quality of Figure 2-10 needs to be improved (cannot read tables even when enlarged).	The Engineering Report has been updated.

Comment ID	Ref./Page No.	Comment	Response
N/A	Chapter 4 (Environmental Consequences)	Chapter 4 is a very comprehensive discussion of all the specific and perceived impacts associated with the six action alternatives of the Tamiami Trail Modifications: Next Steps project. Impacts were grouped into sixteen topics, of which many had multiple sub-topics such as, the Special Status Species topic, which had subtopics dealing with the Florida Panther, manatee, Snail Kite, Eastern Indigo snake, Cape Sable Seaside Sparrow and the Wood Stork. Each topic was discussed using the same format; policies and regulations, methodologies used, no-action alternative evaluation, and action alternatives evaluations. The impacts of the no action alternative were said to be "already realized from the construction of the 2008 LRR/EA preferred alternative (1-mile eastern bridge)," and as a result the analysis for each topic was exactly the same: "If the No-Action Alternative is selected as the preferred alternative, there would be no additional direct or indirect short- or long-term impacts."	No change.
N/A	Chapter 4 (Environmental Consequences)	This repetition of findings was also prevalent throughout Chapter 4 whenever it was required, by Executive Order 13514, to discuss climate change. Chapter 4 does a very good job of describing the findings of the Intergovernmental Panel on Climate Change (IPCC) and the Second Report of the Miami-Dade County Climate Change Advisory Task Force (CCATF). It does not do a very good job discussing the implications of these findings relative to the action alternatives. Rather than incorporate the large-scale implications of climate change and sea level rise into the section on Cumulative Impacts, this EIS simply repeats "that global warming would result in many changes in the natural environment" and that "sea level would rise an additional 1.5 feet in the next 50 years." It is not clear why this was repeated over and over, or why climate change was not mentioned in, the most appropriate action topic of, Hydrology.	Climate change was addressed per the most recent guidance from CEQ. Impacts to hydrology as a result of climate change will be addressed as part of a future water operations plan.
N/A	Chapter 4 (Environmental Consequences)	A discussion of Cumulative Impacts as part of the Action Alternatives is a valuable and important element of this EIS. It helped point out the dependencies of this Next Steps program on other projects such as River of Grass, WCA-3A Decompartmentalization and MWD. However, Cumulative Impacts made a very simple but possibly incorrect assumption that these upstream programs will supply the water quantity and water quality needed to produce the flow capacities and habitat needs without damaging upstream habitats. The Cumulative Impacts sections reads like a justification to move forward due to large-scale downstream benefits, but there was no discussion of possible large-scale upstream impairments.	The Cumulative Impacts Analysis has been updated.
N/A	Chapter 4 (Environmental Consequences)	Also, discussing the construction of additional bridges across Tamiami Trail without a concomitant discussion of the operational plan creates a serious inability to evaluate any of the alternatives, and although the Cumulative Impact discussions goes a long way to reduce this deficit, it is not enough, especially in terms of water quality. Discussion of water quality in relation to greater residence times upstream, loading rates, and potential downstream impacts was particularly inadequate in light of the fact that much is known about the reasons for this Extra Steps program and the water quality benefits and impacts associated with the operations of any of these action alternatives.	This project only addresses the construction of the bridge and road infrastructure along Tamiami Trail. An operational plan is not included as a part of this project. Therefore, any impacts that may occur as a result of future water operations will be assessed as part of the operational plan.
N/A	Chapter 4 (Environmental Consequences)	Finally, there was a tendency to couch the Minor, Moderate, and Major impacts thresholds over a relatively large area and long-term characteristic of the landscape. However, The analysis area was consistently disconnected by instead referring to "the 10.7 -mile project corridor including the 50-foot right of way" (see pg 4-25 on Floodplains).	The area of analysis for all topics is described under each topic and may include either the primary area along the Tamiami Trail roadway corridor (including a 50 foot easement) or the expanded study area, including indirect impacts to Northeast Shark River Slough and the entirety of Everglades National Park. Impacts were analyzed within these areas defined by the project limits.
N/A	Pg 4-1 - 4.2:	Definitions of analysis terms is well done.	No change.
N/A	Pg 4-2:	Cumulative Impact analysis technique would have been better implemented if there was a numeric measure used. A numeric approach would have removed the perception that this is a very subjective evaluation tool.	The Cumulative Impacts Analysis has been updated.
N/A		The Design High Water (DHW) discussion is confusing. Is the Next Steps program based upon the 20-year 9.7 ft criteria of the 100-yr 10.1 ft criteria?	The DHW is defined as the 20-year 24-hour stage, assuming a natural systems conditions, based on regional hydrologic model and a 36-year simulated period of record. The 100 year flood stage is 10.1 for this area in the NSM and was utilized for overtopping criteria. This will be clarified in the document and the definition of the DHW will be added to the glossary.
N/A	Pg 4-10 - 4.12:	The whole topography and soils topic should have tried to deal with a more CERP-like performance measure such as, Ridge and Slough microtopography. Peat loss is indeed important, however returning Everglades function requires differential peat loss and accumulation rates.	This section will be reviewed.

Comment ID	Ref./Page No.	Comment	Response
N/A	Pg 4-11:	The statement that" the implementation of MWD and CERP projects planned for the Everglades area is anticipated to result in a cumulated long-term beneficial effect on soils" is false because these programs do not have plans for water quality improvement projects, and because nutrient loading rates to the Park will likely increase soil TP.	Water quality has been analyzed as part of this document. These impacts have been considered in the long-term effect to soils.
N/A	Pg 4-15:	References for the velocity targets should be given since this is a goal with much uncertainty.	Additional information about the HEC-RAS modeling analysis has been provided in Appendix C.
N/A	Pg 4-28 -- pg 4-29:	Even without an Operational Plan it is clear that all action plans will increase ecological connectivity. The problem is that this is considered to be completely beneficial in this EIS when the spread of exotic fish from upstream canals may be an impairment to the Park. How can one implement exotic species control for exotic fish?	This project only addresses the construction of the bridge and road infrastructure along Tamiami Trail. An operational plan is not included as a part of this project. Therefore, any impacts that may occur as a result of future water operations will be assessed as part of the operational plan.
N/A	Pg 4-67 - 4-72:	This topic on Socioeconomics is complex. It is great that a actual model was used to supplement the evaluations. However, more effort should have been spent upon the cumulative impacts associated with recreation, fishing and environmental justice.	This section will be reviewed.
N/A	Chapter 2 – Alternatives - Introduction/Outline:	The following is an assessment of the alternative evaluation approach, including a) the appropriateness of the recommended Performance Measures (PMs) to quantify attainment of project specific goals and objectives, b) a review of PM scoring and ranking methods and c) a review of the overall ranking or integration of PM scores (to select a TSP).	No change.
N/A	Chapter 2 – Alternatives - Appropriateness or relevance of PMs to project goals and objectives:	<p>The goals and objectives of the Tamiami Trail Modification project include: attainment of more natural connectivity including increased flows and velocities and increased sheetflow. Increased connectivity is expected to benefit ridge and slough habitat within ENP wetlands. In addition to flow and habitat benefits, the project is expected to benefit (or at least not harm) wildlife and cultural resources.</p> <p>Eight of the original 13 PMs used in the 2005 RGRR and 4 additional PMs from the 2008 LRR were screened out of the original list of potential PMs because no hydrologic model output was available for the alternatives in question.</p> <p>The Draft EIS indicated that two types of PMs were applied to evaluate the varying (6) project alternatives. The first class of PMs was ecological and the later set was developed for cultural resources. In total 8 PMs were applied to the Tamiami Trail Modification project. The main focus of this evaluation is the ecological PMs.</p> <p>a. Ecological PMs included:</p> <p>i. PM-1 Potential connectivity of Water Conservation Area 3B marsh and Northeast Shark River Slough as percent of total project length- the PM is justified and consistent with the goals of the project. The metric used was miles of bridges (relative to the potential 10.7 miles maximum bridging extent).</p> <p>ii. PM-2 Number of sloughs crossed by each alternative- although the goal of the program is not only to rehydrate sloughs, but rather to achieve natural system hydroperiods, the metric is consistent with the goals and objectives of the project. By hydrating sloughs one also hydrates neighboring habitats within the ridge and slough mosaic of the Everglades. Without hydrologic output, one cannot evaluate the effects on varying habitat types. During alternative design and associated modeling, potential effects of high stages and extremes should be evaluated. Similar to the PM above, this PM uses miles of bridges as the metric but combines location to determine the number of historic sloughs the bridges will cross.</p> <p>iii. PM-3 Flows into NE Shark River Slough (NESRS) provided via bridge- The PM is consistent with the goals and objectives of the project and the metric effectively characterizes relative potential flows of the varying alternatives to the estimated marsh capacity of an approximately 11 mile stretch of marsh across NESRS (from the L-67 to the L-31 ext). The metric used was miles of bridges. (One uncertainty is the 200ft wide intervals used to calculate marsh capacity. Given that the HAED is not available at 200ft intervals it s unclear what data was used)? Additional uncertainty associated with actual bridge length and sloping and support features-detailed design phase.</p> <p>iv. PM-4 Difference between average velocity in Marsh and average velocity at road- this PM is consistent with the goals and objectives of increased flows and sheetflow. The model HECRAS was used to simulate the bridge and culvert alternative. HECRAS indicated that all alternatives could</p>	No change. The PMs for this project were determined by the PDT based on current available information and past studies done for this roadway corridor. The assumptions and uncertainty associated with the PMs is noted.

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		<p>pass the potential needed maximum flows of 6200 cfs. Although noted in the Choosing by Advantage (CAB) report- table 4 lacks the average flow velocity in the marsh and hence the normalized scores are assumed to be correct. Additionally, it is unclear that the normalization effectively characterizes the ecological impact of varying flow velocities associated with each alternative. It more or less assumes a linear relationship between equitable flows and ecological performance. There is considerable uncertainty surrounding the exact shape of this curve and the range of velocities needed.</p> <p>v. PM-5 Reduction in wildlife mortality- consistent with the do no harm objective, this PM aims to forecast the effects of bridging on highway mortality of Everglades wildlife. Although an understandable objective and important, the methods used to quantify this effect appear to be crude and lack references and supporting evidence. The general assumption that increased bridging will decrease access to the road may be correct, but without a stronger understanding of species and population dynamics, this is a big assumption. An alternative assumption could be that bridging leads to concentration effects by neighboring structures thereby making wildlife more susceptible. This PM is focused on the footprint of the project and does not account for the potential benefits that the hydrologic feature can provide across the larger domain (ponded upstream habitat and dry downstream of Tamiami Trail.)</p> <p>vi. PM-8 Impacts to wetlands (Uniform Mitigation Assessment Method or UMAM approach)- The UMAM PM is focused on the footprint of the project. Construction features were intersected with the Land Use Land Classification layer to estimate the amount of permanent effects to wetlands. The impacted area before and after alternative implementation are compared. Without a specific listing of the acreages used, the UMAM scores cannot be replicated.</p> <p>b. Cultural resource PMs included:</p> <p>i. PM-6 Impacts of Tamiami Trail as cultural resource- under this PM, the alternative that minimizes the length of roadway removal performs the best.</p> <p>ii. PM-7 Impacts to historic properties- provides a qualitative description of the potential impacts to 3 historic properties. Impacts are described as limiting access, loss of usable ground, degradation of the visual setting, etc.</p>	
N/A	Chapter 2 – Alternatives - PM Scoring and weighting/ranking methods:	<p>The PM scoring methods were more or less described in the CAB document and in Chapter 2. Because bridge length (and in some cases location) were used as metrics for the first five environmental PMs, all of the PMs score similarly. The rank performance for each alternative is the same for each of these PMs. Only the UMAM PM scores differently. It is difficult to evaluate the UMAM PM given the limited documentation available. For PMs 1 -5, the alternatives rank (from best to worst) is 6E, 2A, 1, 5, 4, and lastly the no-action alternative. The UMAM PM, which is mainly focused on the project footprint, scores the no-action alternative the best, followed by 6e. The remaining alternatives perform more or less the same.</p>	No change. In regards to the UMAM PM, a site specific field evaluation (i.e., UMAM) will be conducted in coordination with the relevant agencies during the permitting stage of the project.
N/A	Chapter 2 – Alternatives - PM Scoring and weighting/ranking methods:	<p>The weighting/ranking methods are not described in detail. A table of PM scores and importance values is provided. The current method assigns the most importance to the sheet flow factor and then workshop participants weighted all other factors on the same scale. This is an outcome of both the CBA and the defender-challenger process. One would likely have to refer to detailed meeting notes to determine what factors were considered when establishing the relative weights. It is more transparent to apply equal weights across alternatives for each PM thereby providing a weighted score for each metric which can then be aggregated to select the TSP.</p>	No change.

Comment ID	Ref./Page No.	Comment	Response
N/A	Chapter 2 – Alternatives - Aggregation and synthesis of PMs:	<p>Once performance of alternatives was evaluated using individual PMs and the PMs were ranked based on importance, scores were then aggregated to come up with a single importance score. The alternative scoring the highest was selected as the recommended alternative. It should be noted that the measure or metric used for Performance Measures 1, 2,3 and 5 was the same measure. Bridge length was used as a proxy for these PMs (noted above). For some of the PMs bridge location was also part of the consideration. Although the ecological justification is warranted, using the same measure leads to similar results. Although the goals are appropriate, it is likely better to provide the narrative about goals and objectives and point out that a single measure can be applied. Although PM 4 does not use bridge length as the measure, alternatives rank exactly the same for PMs 1-5. (Basically the goals are correlated yet not exactly the same, yet the same metric was applied. Essentially this can overweight the goal relative to other project goals). In addition to having the same or highly correlated metrics, these same PMs were all weighted as the most important factors. This compounds the potential weighting bias. Although the results would likely be the same, the perception is that there is overemphasis on a single or highly correlated set of metrics. It should also be noted that the cultural resource PMs and the UMAM PM were weighted the least (see discussion above). Although the cultural resource PMs score the alternatives nearly opposite to the ecological PMs, when aggregated these measures provide little input to the total alternative score given the low weights assigned.</p>	The PMs and weights were determined by the PDT through a series of meetings. No change.
N/A	Chapter 2 – Alternatives - Value analysis/cost benefit:	<p>Overall this is a cost accounting section that compares the estimated benefits with costs. Figure 2-6 and table 2-14 show the distribution in cost-benefits across alternatives. Although all alternatives (except the no-action) were deemed cost effective, alternative 6e was decided to be the most efficient. Alternative 6e clearly provides the most benefit yet it should be noted that it is hard to say that the alternative is the most cost efficient. Given the uncertainties associated with the above methods, alternative 2a also appears to be very cost efficient relative to the other alts. The cost per unit lift for Alt 6e and alt 2a is \$0.99 and \$1.0, respectively. One factor not included is the potential adaptive management costs if alt 2e is not sufficient in scale. Alt 6a provides needed flexibility and robustness.</p>	The additional USACE cost analysis was conducted because of the similar inflection points of alt. 2a and 6e. Alternative 6e is slightly more cost efficient and better meets the project purpose, need, and objectives.
N/A	Chapter 2 – Alternatives - Assumptions and related Uncertainty:	<p>Achievement of the benefits noted in chapter two and the CBA document (Appendix A&B) is based on set of critical assumptions. Given that timelines and certainties of the scale and scope of other everglades restoration projects is uncertain, the benefits ultimately achieved by the TSP are also uncertain. This approach is different from the traditional USACE planning process of looking at the project in isolation (or the next added increment process). The following list of assumptions must be met to maximize the restoration benefits of the selected plan.</p> <p>Assumptions:</p> <ol style="list-style-type: none"> All of the alternatives assume 9.7 foot stage constraint in the L-29. L-29 levee and canal will need to be removed for true marsh connectivity and sheetflow to occur. In the interim the S333 and L-29 will still be used. A seepage buffer along the E levee is needed or much of the flow is likely to be lost to seepage Lack of modeling results limit the understanding across the larger spatial extent N and S of the Tamiami Trail and this has led to dependency on earlier efforts and BPJ. <p>Uncertainty:</p> <ol style="list-style-type: none"> Section 5 of CBA indicates equitable distribution of flows yet introduction indicates distribution was not even? This is a bit unclear and the exact distribution of flows or target distribution has uncertainty associated with it. Location of culverts- this is based on historic distributions since road construction. Landscape features may have changed in the region (sediment deposition, TI formation, etc) adding uncertainty to PM-2 Relationship to CERP and other programs/projects 	Assumptions and uncertainty are noted.

Comment ID	Ref./Page No.	Comment	Response
N/A	Chapter 2 – Alternatives - Conclusions and recommendations/ Take home result:	Chapter two of the Draft environmental impact statement links the goals and objectives of the project to the specific performance measures applied. Additionally the chapter and related materials (Appendix A&B) provide an overview of the PMs and how they were scored and how the PMs were weighted and aggregated in order to select a Tentatively Selected Plan. Overall the PMs selected were consistent with the goals and objectives. Although the metrics associated with the PMs were duplicative, this would likely not have changed the result of the evaluation. Increased bridging is expected to increase sheet-flow and provide more natural hydroperiods. Key assumptions include future projects degrading and removing the L-29 levee and canal, thereby leading to true sheet-flow (as well as some form of seepage buffer in NESRS). Currently although flows would pass into NE shark river slough via the bridges, water would still pass through the canal. Under current conditions some control capacity is likely desirable given the potential to have effects upstream of the project. Without alternative hydrologic model results this factor cannot be effectively evaluated. Over time as increased water storage and treatment are available, the northern and southern projects are expected to come into alignment. Current discussions with the CERP DECOMP project include a Northern spreader canal that would increase sheet flow at the NWCA3A boundary. Maximizing natural flows at Tamiami Trail through increased bridging is consistent with the system level objectives including those of the CERP program and the Long-term Plan. Alternative 6e provides the greatest potential benefits given the above assumptions are met. It will also likely provide some interim benefit to some of NE SRS. Ultimately shifting flows from WCA3A (including the S-12s, etc) toward NESRS is highly desirable to achieve natural system hydrologic targets and to achieve corresponding ecological benefits in the ridge and slough and neighboring systems.	No change.
N/A	Chapter 3 (Affected Environment)	This chapter describes the current environmental conditions within the project area, basically setting the stage for Chapter 4 in which potential impacts of the alternatives are noted. In its present format this chapter is repetitive, however, that may be the nature of an EIS document. If not, I suggest the length of the chapter be cut by 50 percent. Also, perhaps use a single editor to ensure the style and level of detail provided are more consistent throughout the chapter. Throughout the chapter, the Water Conservation Areas are discussed as though they are not part of the Everglades, while it is true they are not Everglades National Park, they provide more environmental benefits than just impoundments. I only make this point, because in Chapter 4 significant emphasis is placed on the importance of reconnecting the ecosystem.	The EIS document is formatted per NPS guidance for NEPA documents. The document will be reviewed and edited for consistency.
N/A	Chapter 3 (Affected Environment)	Add P values for all statements that suggest significant differences were found, or remove the word significant.	P values have been added or the word "significant" has been removed from all statements that suggest a significant difference was found.
N/A	Chapter 3 (Affected Environment) - Figure 3-3.	Suggest the addition of the equation for the trend line for Transect 2. For transect 3, a straight line may be equally viable, indicating no change with distance from canal. Suggest evaluating both no trend and trend line.	No change.
N/A	Chapter 3 (Affected Environment) - Page 3-8, second line.	The L67's were constructed to stop eastward seepage.	Text has been revised.
N/A	Chapter 3 (Affected Environment)	Many of the detailed information, e.g., number of birds in the system, use Lodge 2005 as a reference. More technical references would be appropriate. Many of the figure legends, e.g., Figure 3-3, have a heading of time series. Yet values over time are not presented, but summarized in box plots. Suggest eliminating time series from the name.	References will be checked for accuracy. The term "time series" has been removed.
N/A	Chapter 3 (Affected Environment)	Table 3-2. Assuming TP load, Kgs, is kilograms, the correct unit is kg. Given the other units are imperial, suggest switching all units to metric, or all units to imperial.	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment)	Page 3-15. Statement that "average TP concentrations into Northeast Shark River Slough are above this ecologically meaning threshold ... " needs to be clarified. The TP threshold is based on geometric means, it is not clear from this statement whether arithmetic or geometric means were calculated.	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment)	Page 3-15, nutrient effects downstream of culverts may also be attributed to localized loading, even if TP concentrations were at or below the TP threshold. This may be a good place to make this point because it provides further support for creating larger openings in the landscape, as opposed to smaller bridges or culverts.	The Water Quality section of the EIS has been updated.

Comment ID	Ref./Page No.	Comment	Response
N/A	Chapter 3 (Affected Environment)	Page 3-16, statement that community changes with even small increments ofTP, e.g., 5 ug/L above background, should also note that the loads were high too.	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment)	Page 3-17, define Spc.	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment)	Page 3 -19. Referring to Figure 3 -13 .. "During recent years, since 2007, an increasing trend in sulfate ... ". It should also be noted that higher values were observed in 2004 and 2005. The trend lines alone are not that convincing, suggest further data analysis.	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment)	Table 3-3. Because data are not paired, e.g., S333 has a POR of 1997-2007 for Cd (n=56), while Frog City POR= 1997-2000 (n=7), it is hard to draw any conclusions about the data. Suggest running comparisons for paired data to see if the same differences were observed.	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment)	Page 3-21, 1 st line, last paragraph- remove quarterly from descriptor of ambient monitoring program, because later on state that sediment samples were collected semiannually. Also add when the program began, such that the above detection values observed since March 2008 can be put in context.	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment)	Figure 3-15, not sure that I agree that values changed with distance from the S333 as there is no apparent consistency and values are all low. Were statistical tests run?	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment)	Page 3-23. Not clear what is meant by (Fig 3.16b)?	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment)	Figure 3-17. Suggest using different symbols of similar size for clarity because it is hard to see the decrease that is discussed in the text.	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment)	Page 3-26. Suggest rewording sentence that suggests soil depth, plant composition etc are metrics of water depth.	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment)	Page 3-27. The sulfate concentration bullet is misleading because high concentrations were also observed in earlier years. See prior comment on Figure 3-13.	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment) - Figure 3-19.	Appears to be a lot of sawgrass in this slough?	Photo was taken in Everglades National Park.
N/A	Chapter 3 (Affected Environment) - Page 3-33	... "dahoon (Ilex ... " should be dahoon holly.	Done.
N/A	Chapter 3 (Affected Environment) - Page 3-36.	No scientific name for banana lily.	Text has been corrected.
N/A	Chapter 3 (Affected Environment) - Page 3-38.	I think the author means WCA3. Because while WCA3B is the Francis Taylor Wildlife management area it does not have a western boundary of Cypress trees. USFWS should be the Florida Fish and Wildlife Conservation Commission, as the State agency manages the land.	Text has been corrected.
N/A	Chapter 3 (Affected Environment) - Page 3-41.	WCA3B is not a reservoir.	Text has been corrected.
N/A	Chapter 3 (Affected Environment) - Page 3-43.	Gray Fox and Racoon should not have the same genus and species.	Gray fox has been removed from the species list. The entire list has been checked for accuracy of scientific names.
N/A	Chapter 3 (Affected Environment) - Page 3-49.	Suggest identifying panther symbols by color based on year of observation. This would alleviate any confusion with data range 1981 to 2009, yet no panthers found in the area during the last six years. Conversion between metric and imperial is incorrect for weight. Also, in some cases a weight range is given therefore the conversion should be provided as a weight range.	The Special Status Species section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment)	Too much detail in describing individual birds and animals, and no consistency in format, e.g. some have weight, eye color, leg color, others do not. Suggest reducing the length of the descriptions.	The Special Status Species section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment)	Page 3-55. Suggest adding a map showing the location of the sub-populations of the cape sable seaside sparrow.	The Special Status Species section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment)	Page 3-57. "Three wood stork rookeries" .. This is a little confusing, as Figure 4 has four rookery symbols in the area.	The Special Status Species section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment) - Page 3-76, para 2	"slight modifications to the roadway" ... wasn't the road significantly rebuilt- hence the old tamiami trail? Somewhat misleading.	Text has been revised.

Comment ID	Ref./Page No.	Comment	Response
N/A	Chapter 4 (Environmental Consequences)	<p>It is currently impossible to assess the environmental impact of the alternative options because, as noted throughout the chapter, no operational plan has been developed.</p> <p>For example, in the discussion on water quality impacts "Long-term effects on water quality would result from implementation of an operational plan in association with this project alternative. Long-term effects to water quality resulting from operations remain unknown since an operational plan has not yet been developed for this project alternative. Since a water operations plan has not yet been developed and is not being analyzed as part of this EIS, long-term effects to water quality would need to be assessed as part of any future project that implements an operational plan"</p> <p>How the system is operated will have a significant impact on downstream areas. For example, localized loading of nutrients was a key point made in chapter 3, resulting in vegetative "halos". As a result of just nutrients, one alternative is likely to have a greater long term impact than another. Higher flows through smaller gaps will likely have a greater local impact, than lower flows through larger gaps. Similarly, gaps more widely distributed across the project area are likely more beneficial than those located at either end.</p> <p>Philosophically, increasing the connectivity is a key goal in Everglades restoration, and this document frequently cites the role this project plays in concert with other restoration efforts. Ultimately this is likely a positive move, however without any understanding of how the system will be operated, both before, during, and after the completion of other listed projects, the impact of this project this cannot be assessed.</p>	This project only addresses the construction of the bridge and road infrastructure along Tamiami Trail. An operational plan is not included as a part of this project. Therefore, any impacts that may occur as a result of future water operations will be assessed as part of the operational plan.
N/A	Chapter 3 (Affected Environment)	In general, the information contained within the chapter is adequate to describe existing conditions; however, the document contains speculative and statistically unsupported trends, conclusions, and predictions. In some cases data are presented without context or an inappropriate context. There are also numerous factual errors.	This chapter will be reviewed for errors.
N/A	Chapter 3 (Affected Environment)	<p>It is recommended that Chapter 3 be substantially revised. Specifically:</p> <ul style="list-style-type: none"> o The document needs a thorough review for accuracy o Statements regarding data trends and significance should be limited to published statements (i.e., authors of the EIS should avoid drawing their own conclusions unless supported by a rigorous analysis) o Statements relating data to environmental impacts require context so that the reader can draw their own conclusion; and o Use of ambiguous terms and statements should be removed (text should be factual). 	This chapter will be reviewed for accuracy.
N/A	Chapter 3 (Affected Environment)	It is also suggested that the authors make use of an additional data source. There have been numerous Investigator Annual Reports (IAR) and Comprehensive Annual Reports (CAR) submitted to ENP by SFWMD as required by the Test-7 Collection Permit. These reports contain environmental monitoring summaries for sites in Shark River Slough and WCA-3B.	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment) - Page 3-2-	Provide the value(s) of the correlation coefficients (r=?) such that the strength of the relationship can be quantitatively established.	The value of the correlation coefficients has been provided.
N/A	Chapter 3 (Affected Environment) - Page 3-4-	Is the statement "Since Tamiami Trail was constructed ..." supported by independent research or is this an author's supposition? I am not aware of any study or data that concludes that sediment in sloughs has accumulated as a result of the influx of sediments.	Text has been revised.
N/A	Chapter 3 (Affected Environment) - Pages 3-8 and 3-9-	The section on "Current Surface Water Conditions" should be reviewed to produce a concise and accurate summary of current conditions.	This section will be reviewed.
N/A	Chapter 3 (Affected Environment) - Page 3-9-	The term "dwindling" is vague. This sentence implies that there will be less water in the future than now, not that human resources will require more water resulting in less water for the environment.	The term "dwindling" has been removed.
N/A	Chapter 3 (Affected Environment) - Fig 3-5 and 3-6-	It would be helpful if the sampling locations labels were the same.	The figures/tables have been revised to show the same sampling location labels on all applicable figures/tables.
N/A	Chapter 3 (Affected Environment) - Fig 3-6-	"Mean time series" is a redundant and meaningless phrase when reporting box plots.	The Water Quality section of the EIS has been updated.

Comment ID	Ref./Page No.	Comment	Response
N/A	Chapter 3 (Affected Environment) - Page 3-14-	What are the annual TP loads for the S-333?	The Water Quality section of the EIS has been updated.
N/A	Comments on Chapter 3 (Affected Environment) - Page 3-15-	The statement "However, it should be noted ... " should be removed given the hyperoligotrophic nature of the Everglades, the entire systems is sensitive to "slight" increases in nutrients and teeters constantly on noncompliance.	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment) - Page 3-15-	The TP threshold is a geometric mean of 0.010 mg/L not an arithmetic mean. Are the references to "average" TP concentrations the geometric or arithmetic mean? This needs to be made clear throughout the entire document.	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment) - Page 3-16-	Example of context issues. While it is true that the DO standard for Class III waters is 5.0 mg/L, it must be stated this value is not appropriate for the Everglades. Oxygen values fluctuate greatly throughout a 24 hr period and the Florida's Department of Environmental Protection has suggested a mathematical procedure to convert point measurements to a daily value. Daily DO values in wetlands rarely meet this standard due to shallow water depths and greater amount of organic matter increasing respiration rates. It is unclear why discussion of standards for Class III waters was limited to just DO and did not include reference to other constituents, like specific conductivity? There is a value, and like DO, has little relevance to wetlands. Nonetheless, consistent context should be maintained throughout the document. I disagree with the statement that SpC increased with distance from the S-333. The means are likely not statistically significant given the box-plot characteristics. It is highly probable that sample size is having a profound effect on the author's interpretation. More importantly, one would be hard pressed to conclude that patterns in DO, pH, and SpC along the L-29 are ecologically significant or meaningful. Scientifically and statistically there is no gradient.	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment) - Page 3-18 and Fig. 3-12-	Again I disagree that a discernable and ecologically meaningful pattern can be drawn from the presented data. Suggest that just the data be presented and interpretations left to a minimum or qualified expert.	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment) - Page 3-19, Fig 3-13, and Fig-14-	The statement regarding an increasing trend is unsupported and meaningless given that they fall within historical patterns. Moreover, outlandish statements like "During recent years, since 2007, an increasing trend in sulfate concentration was recorded at the S-333 monitoring station is a concern due to concentrations of mercury ... " need to be avoided. The data presented in no way supports this statement and is pure speculation. The fish data in Fig 3-14 are not from Shark River Slough, as stated in the text, but the L-67 canals. Also the trend in fish mercury concentrations does not follow the sulfate trend at the S-333.	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment) - Page 3-20, Fig 3-15, Table 3-3.	The values reported for these constituents are close to the minimum detection limits. With regards to the outliers, was there a QA/QC procedure utilized by the authors to warrant inclusion in the data presentation? Were the datasets reviewed for flags and qualifying statements? These values need to be put in context regarding the ecological concern (e.g., LD50's). It is highly likely that the purported trends lack an ecological concern.	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment) - Page 3-26-	What is the definition of an aquatic consumer? Does this include macroinvertebrates, fish, birds, reptiles?	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment) - Page 3-26-	I strongly disagree that a water quality gradient exists across the L-29.	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment) - Page 3-27-	Quantify what is meant by a strong relationship. A statistically strong relationship is defined by high correlation and regression coefficients.	The Water Quality section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment) - Page 3-38 and 3-39-	Example of inaccuracies in the document- Management of the Francis S. Taylor Wildlife Management Area is the responsibility of the FWC not the USFWS and a cypress forest does not fringe the western border of WCA-3B.	Text has been corrected.
N/A	Chapter 3 (Affected Environment) - Page 3-42-	Odd that bass are not included in the recreational fishery.	The text mentions that "approximately 28 native fish species .. may occur within the project area." A few of these species are mentioned as examples.

Comment ID	Ref./Page No.	Comment	Response
N/A	Chapter 3 (Affected Environment) - Page 3-46-	Anthropomorphic should be changed to anthropogenic disturbances.	Change made.
N/A	Chapter 3 (Affected Environment) - Page 3-48-	"The American alligator, federally listed due to similarity in appearance ... ", similar to what?	The Special Status Species section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment) - Table 3-8-	Are there no federally listed plants in the project area? If not, state so.	The Special Status Species section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment) - Page 3-49-	"The Florida panther. .. would reach seven feet. ... ", what prohibits males from reaching this?	The Special Status Species section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment) - Page 3-51-	Accuracy, 1000 lbs does not equate to 200 kg.	The Special Status Species section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment) - Page 3-55-	Taylor Slough is not in the vicinity of Collier County.	The Special Status Species section of the EIS has been updated.
N/A	Chapter 3 (Affected Environment) - Page 3-81-	A map depicting the census zones 1, 2, and 3 for the project would be helpful. I find it difficult to believe that 30,000+ people live within 3 miles of the project area.	The Socioeconomic Report has been updated.
N/A	Chapter 4 (Environmental Consequences)	Chapter 4: Environmental Consequences examines the impact of each project alternative as they relate to the affected environments described in Chapter 3 both in terms of beneficial and adverse impacts. Summaries of relevant laws, policies, and assessment methods are also provided.	No change.
N/A	Chapter 4 (Environmental Consequences)	One issue that could be better addressed is the analysis of Water Quality (section 4.3.2). Granted it is difficult to know with certainty what long-terms effects are likely without an operational plan; however, the topic still should be addressed in the EIS because the greatest negative ecological impact associated with the Tamiami Trail modifications will occur in the interim period between completion of this project and the entire restoration effort. Any interim operational plan implemented before the "Cumulative Impacts" can be realized will have likely have an impact that can be described in as a "realm of possibilities" or "worst case scenario". It is one thing to admit there will be a long-term effect and another to say that it remains unknown and it will be dealt with later (Page 4-17, 2nd paragraph in the analysis section). The EIS should outline what the concerns are and offer suggestions to have them minimized when the operation plan is developed.	The Water Quality section of the EIS has been updated.
N/A	Appendix F - Socioeconomic Report - Cost Effective Analysis: Page 23.	Need to provide a reference where this method has been applied elsewhere in a similar context. I cannot follow the logic of how these numbers were calculated. For example, how were the "Importance Score" numbers calculated and how were these numbers converted into "Cost per lift"? In addition, how does the no Action Plan achieve a score of 70? What is the uncertainty of these analyses? This section needs a lot of work in terms of explaining the methodology especially since these numbers are converted directly into a cost which appears to the primary basis for the selection of the final alternative 6e. This section is weak and needs significant improvement for the noneconomist to understand. Perhaps the method is explained in another part of the document which I have not read.	The Socioeconomic Report has been updated.
N/A	Appendix F - Socioeconomic Report - Impacts to Regional Water Supply:	Similarly, the report does not address potential impacts of alternative 6E on regional water supplies and existing legal users located within the project area. Water levels maintained in WCA-3B currently seep underneath the eastern perimeter levee providing recharge to Miami-Dade County's Northwest wellfield. The draft report does not address potential impacts of alternative 6E on the adjacent Northwest wellfield which seems like a major deficiency in the draft report and not accounted for in its economic analysis. As stated in the report, the Northwest wellfield is the largest drinking water well field in the state and supplies 40 percent of Miami-Dade County's potable water.	The Socioeconomic Report has been updated.

Comment ID	Ref./Page No.	Comment	Response
N/A	Appendix F - Socioeconomic Report - Recreation:	The FFWCC and the South Florida Anglers for Everglades Restoration (SF AER) have previously identified the WCA canal system and adjacent marshes as an important recreational fishery for the region. Florida is the fishing capital of the world. A survey take in 2006 found that 14% of Florida residents fish. The WCAs represent one of the "Top 10" bass fishing destinations in Florida and supports the highest catch per angler effort for largemouth bass of any water body in the state and also supports excellent catfish and bluegill fishing. The WCAs support hundreds of bass fishing tournaments each year, are important to the state in terms of fishing licenses issued, and to the local economy that support local bait-and-tackle shops, fishing marinas and fishing guide services. I was surprised that Table 16 in the report (Demand & Facility Needs) did not include fishing within the Regional 11 nor was the economic impact of fishing in the WCAs specifically addressed in the report. I would have to assume that alternative 6e will have little impact on fishing in the WCA canal system. If that is true it should be stated in the report.	The Socioeconomic Report has been updated.
N/A	Appendix F - Socioeconomic Report - Page 3, paragraphs 2 & 3.	Provide reference where this information comes from.	The Socioeconomic Report has been updated.
N/A	Appendix F - Socioeconomic Report - Page 4,	Eliminate the acronyms RED, SAP and OSE in report, they are not necessary.	The Socioeconomic Report has been updated.
N/A	Appendix F - Socioeconomic Report - Page 6,	Fix the obvious problems (column width/point size) in Tables 1, 12, 14	The Socioeconomic Report has been updated.
N/A	Appendix F - Socioeconomic Report - Page 7.	It would be helpful to provide a map of where Zones 1,2 & 3 are located.	The Socioeconomic Report has been updated.
N/A	Appendix F - Socioeconomic Report - Page 10.	Need a summary paragraph to Section 3:Socio-Economic Profile. What does all the demographic/statistical data tell us?	The Socioeconomic Report has been updated.
N/A	Appendix F - Socioeconomic Report - Page 10	Last paragraph. part of first sentence making the state a significant tourism and retirement destination	The Socioeconomic Report has been updated.
N/A	Appendix F - Socioeconomic Report - Page 15, 3.3 Land Use, 2nd paragraph.	The dominant natural features are the Everglades National Park, WCA-3A and WCA-3B (Everglades and Francis S. Taylor Wildlife Management Area), and Biscayne National Park	The Socioeconomic Report has been updated.
N/A	Appendix F - Socioeconomic Report - Page 17, 3.4 Water Demand	Suggest replacing 1st sentence with The principal ground water resources within the study area are the Surficial Aquifer System (SAS), including the Biscayne Aquifer, and the Floridan Aquifer system (F AS). Both are critical to the local ecology and economy of the region. The surficial and Biscayne aquifers provide most of the fresh water for public water supply and agriculture within the region. Due to the regional importance of the Biscayne aquifer, it has been designated as a sole source aquifer by the U.S. Environmental Protection Agency under the Safe Drinking Water Act and is therefore provided stringent protection This designation was made because the Biscayne aquifer is the principal source of drinking water for the region and high vulnerable to contamination due to it high permeability and proximity to land surface. (from LEC Water Supply Plan, SFWMD 2000).	The Socioeconomic Report has been updated.
N/A	Appendix F - Socioeconomic Report - Page 17	The figure showing the location of the major wellfields in Broward/Miami-Dade County needs a number, a title and a source.	The Socioeconomic Report has been updated.
N/A	Appendix F - Socioeconomic Report - Table 14.	Might want to add a column to Table 14 adding up the numbers from Broward, Miami-Dade and Monroe counties so you know where the numbers come from in the text shown above the table.	The Socioeconomic Report has been updated.
N/A	Appendix F - Socioeconomic Report - Page 19, Recreation	May want to mention that freshwater fishing, canoe/kayaking, airboating, birding, are also important recreational activities within the study area. See also my previous comments on recreation (page 2).	The Socioeconomic Report has been updated.

Comment ID	Ref./Page No.	Comment	Response
N/A	Chapter 2, Section 2.2.3, Page 2-7, Pavement Design; Appendix A Engineering Report, Section 6.6.2 Pavement Design, Figure 6-1: Pavement Section (New Construction), Page 43	Revise 12" Type B, LBR 40, SN=0.96 to 12" Type B Stabilized Subgrade, LBR 40, SN=0.96	Main document is consistent with the Engineering Appendix.
N/A	Chapter 4, Section 4.3.3.3, Action Alternatives, Analysis, Page 4-21; Chapter 4, Section 4.3.3.3, Action Alternatives, Conclusion, Page 4-23	Consider the creation of wetlands as a result of the degradation of the road and construction of the bridge as one advantage (positive impact).	Road removal activities have been included as a beneficial effect in the analysis.
N/A	Chapter 4, Section 4.5.3, Impacts of the Alternatives, Action Alternatives, Analysis, Page 4-31; Appendix A Engineering Report, Section 6.6.6 Wetland Impacts, Page 45	The conversion/degradation of the existing road to wetland should also be quantified and presented as part of the Analysis.	Road removal activities have been included as a beneficial effect in the analysis.
N/A	Chapter 4, Section 4.9.3, Impacts of the Alternatives, Action Alternatives, Analysis, Page 4-54.	Revise the analysis. The airboat tour facilities are visitor use facilities.	Accessibility to the commercial airboat facilities has been included in this analysis. Continued operation of these facilities will be determined as part of the Park GMP.
N/A	Chapter 4, Section 4.9.3, Impacts of the Alternatives, Action Alternatives, Analysis, Page 4-57, 3rd Paragraph.	This estimate for adding a bike path is too high. The minimum bridge width which has a 10-foot wide shoulder (Table E-1, page vii) can incorporate the bike path at no additional bridge construction cost. Likewise, the cost for widening the road for a bike path should be approximately \$200K per mile.	The bike path estimates were based on the FDOT required criteria for a bike/multi-use path on this type of roadway/bridge. The NPS supports the addition of a multi-use/bicycle path as a part of the Tamiami Trail Modifications: Next Steps Project. A discussion of the significant public support for a multi-use/bicycle path will be included in the FEIS. A recommendation to consider a multi-use/bicycle path in the design phase of the project will also be included in the FEIS.
N/A	Appendix A Engineering Report, Section 2.62.6 2005 RGR Alternatives for Tamiami Trail Roadway Modifications, Page 13	Match the numbering system for each alternative with those shown in the Draft EIS Report	The Engineering Report has been updated.

Comment ID	Ref./Page No.	Comment	Response
N/A	Appendix A Engineering Report, Section 2.10 Basis of Design for the Modifications to the Tamiami Trail Roadway, Page 22, 3rd Paragraph	Correct the length of the bridges. Alternative 2A in the Engineering Report sums up to 3.4 miles vs. 3.3 miles in the Draft EIS	The Engineering Report has been updated.
N/A	Appendix A Engineering Report, Section 2.10 Basis of Design for the Modifications to the Tamiami Trail Roadway, Page 23, 2nd Paragraph	Correct the length of the bridges. Alternative 6E in the Engineering Report sums up to 5.4 miles vs. 5.5 miles in the Draft EIS	The Engineering Report has been updated.
N/A	Appendix A Engineering Report, Section 4.4.1 Bridge Structures, 1st Paragraph, Page 25; Appendix A Engineering Report, Section 4.6 Anticipated Construction Techniques, Limitations and Problems, 1st Paragraph, Page 28	Specify removal of muck prior to performing and driving of piles. This will eliminate the possibility of muck filling the preformed hole voids.	The Engineering Report has been updated.
N/A	Appendix A Engineering Report, Section 4.4.1 Bridge Structures, Page 26, 3rd Paragraph	Consider using clean sand to fill the preformed holes. Refer to FDOT 455-5.9.	The Engineering Report has been updated.
N/A	Appendix A Engineering Report, Section 6.1.2 Culverts, Page 31; Appendix A Engineering Report, Section 7.1.5 Existing Culvert Extension, Page 50	Identify size and length of existing culverts.	The Engineering Report has been updated.
N/A	Appendix A Engineering Report, Section 6.1.2 Culverts, Page 31,	When were the existing culverts installed? If these are nearing the Design Service Life of 50 years, replace these with new culverts.	The Engineering Report has been updated.
N/A	Appendix A Engineering Report, Section 6.4.1 Roadway, Down Ramps and Bridges/Precast Arch-Type Bridge Culverts, Page 40	Revise MOT phasing to match plans and intent of project which is to widen the roadway towards the south.	The Engineering Report has been updated.

Comment ID	Ref./Page No.	Comment	Response
N/A	Appendix A Engineering Report, Section 6.6.1.1 Roadway, Page 43	Consider adding bike path on each side of the roadway.	The NPS supports the addition of a multi-use/bicycle path as a part of the Tamiami Trail Modifications: Next Steps Project. A discussion of the significant public support for a multi-use/bicycle path will be included in the FEIS. A recommendation to consider a multi-use/bicycle path in the design phase of the project will also be included in the FEIS.
N/A	Appendix A Engineering Report, Section 7.4 Vertical Clearances, Page 50	Provide an 8-foot vertical clearance from high water elevation to allow for continuous access by SFWMD motor/air boats from the L-29 Canal to the south side of Tamiami Trail.	The Engineering Report has been updated.
N/A	Appendix A Engineering Report, Section 12.1 Construction Durations, Page 55, 2nd Paragraph	Clarify duration to specify 6-day, 10 hour/day work week instead of 6 to 10-hour/day work week.	The Engineering Report has been updated.
N/A	Appendix A Engineering Report, Section 4.4.2 Precast Arch-Type Bridge Culverts, Page 27; Appendix A Engineering Report, Section 6.4.1 Roadway, Down Ramps and Bridges/Precast Arch-Type Bridge Culverts, Page 40; Appendix A Engineering Report, Section 7.1.3 Precast Arch-Type Bridge Culverts, Page 49 Appendix A Engineering Report, Plates A-1 through A-2B; Appendix A Engineering Report, Plates S-3, S-4	Consider using a girder bridge in lieu of the arch-type bridge.	The Engineering Report has been updated.
N/A	Appendix A Engineering Report, Plate DR-E2, Option 2	Consider Option 2 but reduce taper length to minimize impact to existing wetlands.	The Engineering Report has been updated.
N/A	Appendix A Engineering Report, Plate DR-C2, Option 2	Consider Option 2 but reduce taper length to minimize impact to existing wetlands. In addition, construct the eastbound exit ramp between the road and Coopertown. Shift the road alignment to the north to provide sufficient room between the road and Coopertown.	The Engineering Report has been updated.
N/A	Chapter 4, 4.8.3 Impacts of the Alternatives, Action Alternatives, Analysis, Pages 4- 48 through 4-51.	If bridges are constructed in areas where existing cultural resources exist, and if the bridges were designed to allow parking areas and traffic underneath, then relocation of the buildings may not be required.	The bridges have not been designed to allow for passage of traffic or parking underneath them. The areas under the bridges will be maintained as natural habitat.

Comment ID	Ref./Page No.	Comment	Response
N/A		In discussing the impacts of the alternatives, this draft EIS states that there is no water operations plan associated with the proposed project alternatives and therefore the longterm impacts cannot be assessed, specifically those associated with water quality and wetlands.	Per language from Congress in the 2009 Omnibus Appropriations Act and per DOI guidance, this project only addresses the construction of the bridge and road infrastructure along Tamiami Trail. An operational plan is not included as a part of this project. Therefore, any impacts that may occur as a result of future water operations will be assessed as part of the operational plan.
N/A		The current draft of the Corps' ERTTP document, (the proposed near-term operations plan) also does not address the potential impacts on water quality and wetlands. Perhaps the current draft ERTTP is looking at a different timeframe, but if the Corps and ENP are not addressing these issues in the respective EISs, where does that leave the remainder of CERP and Everglades restoration efforts?	Per language from Congress in the 2009 Omnibus Appropriations Act and per DOI guidance, this project only addresses the construction of the bridge and road infrastructure along Tamiami Trail. An operational plan is not included as a part of this project. Therefore, any impacts that may occur as a result of future water operations will be assessed as part of the operational plan.

Comment ID	Ref./Page No.	Comment	Response
Miami-Dade County Department of Environmental Resources Protection			
N/A	N/A	<p>Over one year ago, during the process for scoping of this DEIS, Miami-Dade DERM provided written recommendations, which stated in pertinent part:</p> <p>“...The County recognizes that improvements to the Tamiami Trail are part of a critical step in achieving more natural flow of water from the Water Conservation Areas (WCA) to northeast Shark River Slough and Everglades National Park (ENP)... Miami-Dade County expects that improved flow will not only benefit hydrology and the ecosystem in ENP, but will also help to relieve unnaturally high water levels in portions of the WCAs, benefit fish and wildlife species (including listed species) in marshes and downstream areas, and enhance water quality and potential for water deliveries for human water supply. However, increased stages in eastern portions of the WCA and ENP and in certain canals may affect seepage and flood protection level of service to the east. The EIS should include evaluation of ecological and hydrological benefits, including effects on fish, birds, and other wildlife in WCA3a and WCA3b, as well as ENP. It should also evaluate water quality and quantity effects on the natural system and regional wellfields. The EIS should evaluate flood protection, including operational criteria for the S-356 and other seepage features under various canal stages and high water conditions.”</p> <p>DERM staff continues to support this type of holistic approach. However, we understand that the DEIS is intended only to address alternative locations and sizes of bridge spans, and that changes to water levels, operations of water management features, and seepage management are to be evaluated in separate planning projects. DERM staff also acknowledges that stages in the L-29 and completion of other elements of restoration, such as Decompartmentalization, rather than the bridges alone, will have the most significant effects on hydrologic restoration and the volume of water that will ultimately move from the WCA3s to ENP, as well as related effects such as seepage to the east. Though the DEIS assumes a Design High Water of 9.7 feet for the purposes of evaluating potential of the various alternatives for passing water and for designing elements of the road and bridge elevations, this project will only address construction of the selected bridge configurations, and not itself result in changed water levels. Thus, it is expected that most hydrologic benefits associated with additional flow and possible impacts on ecological restoration targets (especially in the WCA3s), water supply or flood protection to the east will be limited, and therefore evaluation of these types of performance measures is largely absent from the DEIS.</p>	No change. Comments noted.
N/A	N/A	<p>In initial review of some sections of the DEIS, we find that it is not as clear as it should be the 9.7-foot Design High Water elevation is not recommended as an operating criterion, or that operating criteria and seepage will be addressed through a separate process. For example, in the current Section 1.5.3 Issues Not Addressed in this Plan (page 1-22 and 1-23), the Combined Operating Plan is mentioned only parenthetically, and water levels or benefits or impacts of increased water flows are mentioned only in a brief phrase. Also, some statements in other sections that refer to the 9.7-foot elevation could be misinterpreted as including an operation plan element (eg. page 2-13 “For this project the Tamiami Trail would be improved to allow for a maximum stage in the L-29 Canal of 9.7 feet” or page 1 of the Engineering Appendix “Alternative 6E was selected as the preferred alternative and consists of approximately 5.4 miles of girder bridges separated into 4 sections with the remaining Tamiami Trail roadway raised to allow a stage of 9.7 ft-NGVD in L-29C...”). Additionally, in the Appendix D: Floodplains Statement of Findings, Item 7 does not include any discussion on future operational criteria, future modeling studies, minimum flood protection level of service, possible benefits or possible impacts to the areas east of the L31-N, and to the floodplain. DERM staff recommends that a more detailed explanation of the process that will be used to address operating criteria in the region, flood protection, seepage management, and integration with other CERP projects be included prominently at the beginning of the report. If possible, a projected timeline should be included. There should also be clearer explanations of how the 9.7 foot DHW was selected and used in the development of alternatives, to distinguish it from an operating criterion. This explanation could be included or cited whenever the 9.7 foot figure appears in a description of the selected alternative, especially in introductory or summary sections of the DEIS.</p>	The difference between the stage water level and the DHW for this project will be clarified in the document to avoid any further confusion between the 9.7-foot DHW and the stage water level. Additionally, the cumulative impacts discussion of the combined impacts from this project and other CERP projects will be expanded. This discussion will be included prominently at the beginning of the report.

Comment ID	Ref./Page No.	Comment	Response
N/A	N/A	DERM staff generally concurs that alternatives with larger bridge openings may have some immediate benefits related to more even distribution of existing flows to a larger area of sloughs and also may provide benefits for passage of wildlife, and even recreational users, from one side of the Tamiami Trail to the other. DERM supports the efforts to select alternatives that avoid and minimize direct impacts to cultural resources of the Miccosukee Tribe and to historic legal uses of marsh habitats for recreation. DERM staff also generally supports the selection of an alternative that will optimize future flexibility and potential for conveyance of clean water from the WCA3 to the south, since this is expected to offer greatest potential benefit to habitat and wildlife in Shark River Slough and in ponded areas of the southern WCA3A, and also to recharge the aquifer to help sustain existing water supply quantity and quality to the east. The selected Tamiami Trail alternative should not constrain future operational opportunities or coupling with related projects in the area. However, the county's full support for the Tamiami Trail improvements is conditioned upon a more comprehensive analysis, which includes operating criteria, seepage management and flood protection, and sequencing and integration with other restoration projects that address WCA3A and WCA3B.	Coordination with the Miccosukee Tribe and the Seminole Tribe has been ongoing throughout the project development process. All efforts have been made to select an alternative that avoids and minimizes impact to cultural resources. Additionally, this project only addresses the construction of the bridge and road infrastructure along Tamiami Trail and an operational plan is not included as a part of this project. Therefore, when water operations are addressed at a later date, the operational plan will have to be developed in association with the proposed project's infrastructure. It will be noted in the FEIS that "full realization of project benefits is dependent upon an operational plan that utilizes the structural capacity of the preferred alternative."
N/A	N/A	DERM staff understands that CERP projects, and presumably other restoration projects must maintain existing level of flood protection and that projects must be designed and operated accordingly, and that this will occur as part of the Combined Operating Plan and Seepage Management Project. When this more extensive assessment of flooding and seepage occurs, it is important that information, either through modeling or other evaluation methods, be included to allow for objective validation of assumptions and conclusions. Following are more specific technical comments from the DERM Water Management Division outlining the type of flood level of service assessment that would be necessary for a more holistic review of the proposed bridge alternative as it would function together with a water management operations plan.	No change. Comments noted.
N/A	N/A	There was no flood routing analysis provided in the DEIS to evaluate possible impacts to the flood plain under stages as high as the Design High Water stage used in the report. The DEIS Report states that the Design High Water of 9.7 feet is based on the NSM and therefore does not take into consideration the urban areas to the east. A 100-year storm flood routing is necessary to map possible impacts to the floodplain, showing a comparison between 100-year maximum stages before and after the implementation of the alternatives. The last 100-year flood routing and mapping was performed under CSOP, but did not address this project. USACE and ENP should demonstrate that the new flood plain would not result in any impacts to the urbanized areas east of the L-31 canal, south of the Tamiami Trail, and C-1 canals, for the 100-year event conditions. The information in Appendix D is limited largely to the construction only and is insufficient for any determination of impacts to outside the immediate area of the bridges.	This project only addresses the construction of the bridge and road infrastructure along Tamiami Trail. An operational plan is not included as a part of this project. Therefore, water operations, seepage management, and flood protection will be assessed as part of a separate operational plan. When water operations are addressed at a later date, the operational plan will have to be developed in association with the proposed project's infrastructure. It will be noted in the FEIS that "full realization of project benefits is dependent upon an operational plan that utilizes the structural capacity of the preferred alternative."
N/A	N/A	The stages provided by the systemwide model are not adequate to establish minimum flood protection levels of service (daily time step, 2-mile grid).	This project only addresses the construction of the bridge and road infrastructure along Tamiami Trail. An operational plan is not included as a part of this project. Therefore, water operations, seepage management, and flood protection will be assessed as part of a separate operational plan. When water operations are addressed at a later date, the operational plan will have to be developed in association with the proposed project's infrastructure. It will be noted in the FEIS that "full realization of project benefits is dependent upon an operational plan that utilizes the structural capacity of the preferred alternative."

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N/A	N/A	The RMA analysis provided in the engineering appendix is only adequate to calculate the bridge capacity and surface flow velocity, once a complete flood routing is conducted.	This project only addresses the construction of the bridge and road infrastructure along Tamiami Trail. An operational plan is not included as a part of this project. Therefore, water operations, seepage management, and flood protection will be assessed as part of a separate operational plan. When water operations are addressed at a later date, the operational plan will have to be developed in association with the proposed project's infrastructure. It will be noted in the FEIS that "full realization of project benefits is dependent upon an operational plan that utilizes the structural capacity of the preferred alternative."
N/A	N/A	The Table 2-11 – in the main body of the report - provided comments related to impacts to flood plain without the benefit of a floodplain analysis. There is no mapping of the modified floodplain after implementation of the project. This mapping needs to be performed at least for the preferred alternative, based on modeling, and presented in the Appendix D.	This project only addresses the construction of the bridge and road infrastructure along Tamiami Trail. An operational plan is not included as a part of this project. Therefore, water operations, seepage management, and flood protection will be assessed as part of a separate operational plan. When water operations are addressed at a later date, the operational plan will have to be developed in association with the proposed project's infrastructure. It will be noted in the FEIS that "full realization of project benefits is dependent upon an operational plan that utilizes the structural capacity of the preferred alternative."
N/A	N/A	There is no mention of possible seepage control methods or mitigation for flood plain impacts other than within the 8.5 Square Mile Area.	This project only addresses the construction of the bridge and road infrastructure along Tamiami Trail. An operational plan is not included as a part of this project. Therefore, water operations, seepage management, and flood protection will be assessed as part of a separate operational plan. When water operations are addressed at a later date, the operational plan will have to be developed in association with the proposed project's infrastructure. It will be noted in the FEIS that "full realization of project benefits is dependent upon an operational plan that utilizes the structural capacity of the preferred alternative."
N/A	N/A	Issues related to the operation of the S-356 pump station must be resolved, including proximity of the easternmost bridge opening.	This project only addresses the construction of the bridge and road infrastructure along Tamiami Trail. An operational plan is not included as a part of this project. Therefore, water operations, seepage management, and flood protection will be assessed as part of a separate operational plan. When water operations are addressed at a later date, the operational plan will have to be developed in association with the proposed project's infrastructure. It will be noted in the FEIS that "full realization of project benefits is dependent upon an operational plan that utilizes the structural capacity of the preferred alternative."

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Seminole Tribe of Florida			
PEPC 531	N/A	<p>The Seminole Tribe of Florida is in receipt of a request for review of the Draft EIS for the Everglades National Park Tamiami Trail Modifications Preferred Alternative 6E. In review of the documents provided on the Alternative and Assessments of Effect of Modifications to the Tamiami Trail, the Seminole Tribe of Florida requests response to and consideration of the following: Will the project interfere with traditional cultural properties utilized by the native peoples such as medicinal and plant gathering areas? Please provide a response to this inquiry. Should you have any questions, please do not hesitate to contact myself or Anne Mullins, Compliance Review Supervisor at (863)983-6549. Willard Steele Tribal Historic Preservation Officer Seminole Tribe of Florida 34725 W. Boundary Road Clewiston, FL 33440 (863)983-6549</p>	<p>No Tribal traditional cultural properties were identified during consultation with the Seminole Tribe of Florida. The project will not interfere with any known traditional cultural properties utilized by native peoples.</p>

Comment ID	Ref./Page No.	Comment	Response
Miccosukee Tribe of Indians of Florida			
N/A	II-A-1	<p>The Draft EIS waits until late in the document to disclose the fact that the full realization of project benefits for the Park directly depend on an operational plan which has not yet been developed. The NPS knows that the bridges can not operate without removing the L-29 canal, which will be far into the future. But, NPA fails to address it. Instead, the NPS is attempting to have it both ways and analyzes the "potential" benefits to ENP that will only occur from operations while refusing to analyze the adverse impacts on both: (1) flood control in the Tribal Everglades in WCA 3A; and (2) flood control in Miami-Dade County.</p>	<p>The 2009 Omnibus Appropriations Act directed the NPS to investigate additional bridging beyond what is being constructed as part of the 2008 LRR plan in order to restore more natural water flow to Northeast Shark River Slough (NESRS). While this direction from Congress required the NPS to complete its investigation in one year, precluding the time to conduct new system-wide modeling for an operational plan, DOI believes there is sufficient technical information collected in the 20 years devoted to development of the Modified Water Deliveries (MWD) to Everglades National Park Project— modeling and evaluation of operational plans—to make informed recommendations to Congress on needed modifications to the Tamiami Trail. Between 2003 and 2008 three projects—2003 GRR, 2005 RGRR SEIS, and 2008 LRR—and hundreds of regional model runs evaluated the ecological benefits of raising the Tamiami Trail. These assessments indicated that substantial modifications (bridging and road-raising) of the Tamiami Trail were needed to substantially improve flows and ecological conditions in NESRS and Water Conservation Area 3 (WCA-3). In addition, three years of modeling for the Combined Structural and Operational Plan (CSOP) component of the MWD project indicated the MWD flood mitigation components would allow for these modifications to the trail, while not adversely impacting private properties along the trail or east of the park (Miami-Dade County). Furthermore, the modeling indicated that even without removal of the L-29 Levee, the additional bridging and road-raising in combination with a future operational plan would substantially improve the volumes and distribution of flows from the L-29 Canal to NESRS.</p>

Comment ID	Ref./Page No.	Comment	Response
N/A	II-A-2	<p>The Draft EIS fails to analyze the impact of both "actual" operation, and de facto operations, of the bridges on both the WCAs and western Miami-Dade County. This is especially disconcerting in that page 4-5 appears to state that the NPS intends to use these bridges as part of the Combined Structural and Operational Plan ("CSOP") even though their operations have not been analyzed and important flood protection projects have not yet been built. Additionally, the NPS is well aware that construction of these bridges will result in an average annual increase in flows into the Park, and a de facto change in operations, that could flood Indian camps, flood Tribal private property, and flood western Miami-Dade County.</p> <p>The full impact of operations on the Miccosukee Reserved Area, the Miccosukee Resort, and the Tiger Tail and Osceola Camps, as well as the Tribe's perpetual lease lands in WCA 3A should have been analyzed in the Draft EIS. They were not. The Draft EIS should have also analyzed the impacts and benefits from operations and selected alternatives that would maximize benefits to the greater Everglades ecosystem. It failed to do so. Alternatives should have been assessed on whether they provide improvements in ecological and hydrological conditions, not just in the Park, but in the WCAs, as well. That too, simply was not done.</p>	<p>As mentioned in our response to Comment 1, the CSOP component of the MWD project was developed in conjunction with completion of the 2005 RGRR SEIS; however, since the 2005 RGRR SEIS was not authorized, CSOP could not be adopted at that time. The 3-year CSOP effort (2003-2006) still provides critical information that can be used when CSOP is reformulated starting this fall. In addition, due to the many similarities between the 2005 RGRR SEIS and the Tamiami Trail Modifications: Next Steps Project (TTM:NS), the 3-year CSOP effort provides valuable information on likely future effects of the TTM:NS Project on WCA-3A and NESRS once CSOP is reconstituted. Importantly, the 3-years of CSOP modeling indicated that raising the Tamiami Trail to allow essentially unconstrained flows between WCA-3B and NESRS—criteria in both the 2005 RGRR SEIS and TTM:NS projects—will substantially improve ecological conditions in WCA-3A and NESRS, without adversely impacting Tribal private property or Miami-Dade County. Technical analysis by the USACE indicate that bridge construction on the trail without raising water levels in the L-29 Canal—considered "de facto" operations in your comment—will only slightly increase flows from the L-29 Canal to NESRS; however, CSOP modeling indicates the completed MWD seepage management components are more than adequate to address this minor increase in flows to NESRS and associated seepage to the east. The TTM:NS Project does contain flood mitigation costs to ensure Tribal Camps and private properties within the footprint of the project will not be adversely impacted by this project.</p>
N/A	II-A-3	<p>Contrary to the NPS' contention that it is conducting a public process, NPS' selection of the Preferred Alternative, its summary dismissal of superior alternatives, and its lack of any meaningful analysis show that the "process" was an exercise in futility. The outcome had already been determined.</p>	<p>Section 102(2)(c) of the National Environmental Policy Act (NEPA) requires that an environmental analysis be prepared for proposed federal actions that may significantly affect the quality of the human environment or are major or controversial federal actions. Section 102(2)(c) of this act also requires that an Environmental Impact Statement (EIS) be prepared for proposed major federal actions that may significantly affect the quality of the human environment. NEPA is implemented through regulations of the Council on Environmental Quality (CEQ) (40 CFR 1500-1508). The NPS has, in turn, adopted procedures to comply with the act and the CEQ regulations, as found in Director's Order 12: Conservation Planning, Environmental Impact Analysis, and Decision Making, and its accompanying handbook (NPS 2001a).</p> <p>Under direction from Congress in the 2009 Omnibus Appropriations Act "to immediately evaluate the feasibility of additional bridge length... for the Tamiami Trail (U.S. Highway 41) to restore more natural water flow to Everglades National Park and Florida Bay and for the purpose of restoring habitat within the Park and the ecological connectivity between the Park and the Water Conservation Areas," the NPS has prepared an EIS for the Tamiami Trail Modifications: Next Steps project. This EIS was prepared in accordance with NEPA, the CEQ regulations guiding NEPA, and the NPS Director's Order 12.</p> <p>The process which the NPS followed for the Tamiami Trail Modifications: Next Steps project to comply with NEPA, the</p>

Comment ID	Ref./Page No.	Comment	Response
			<p>CEQ regulations, and the NPS Director's Order 12 included the following steps:</p> <ul style="list-style-type: none"> - Development of project purpose and need – The project purpose for the Tamiami Trail Modifications: Next Steps project was developed as part of the 2009 Omnibus Appropriations Act passed by Congress on March 10, 2009. The need for action was then outlined based on the project purpose developed by Congress. - Internal scoping - Internal scoping involved the use of NPS staff at multiple levels to decide what needed to be analyzed in the EIS. During this interdisciplinary process, the project issues, alternatives, and data needs were identified. The internal scoping process was also used to develop the public involvement strategy for the project. <ul style="list-style-type: none"> o Development of preliminary alternatives – During the internal scoping process, the NPS examined a full range of alternatives and eliminated alternatives that were not economically or technically feasible. Based on this analysis, the NPS developed a preliminary set of project alternatives (including a no action alternative). - Public and agency scoping – The public involvement process for this project has been well documented and began when NPS published the Notice of Intent (NOI) in the Federal Register. Public and agency scoping in the early stages of the project development process included assembling a Project Development Team (PDT) that included all interested agencies and tribes; several PDT meetings were held to discuss project development, alternatives, and pertinent project issues; a project newsletter was distributed to agencies and the public; a public scoping meeting was held (which was advertised on the Park website and local newspapers); and opportunities for agencies/tribes and the public to comment on the project alternatives, purpose, and need via multiple methods (i.e., PEPC, email, comment forms, etc.) were provided. - Development of reasonable and feasible alternatives – Based on the input received from the PDT, agencies/tribes, and the public during the project scoping process, the NPS developed a reasonable and feasible set of alternatives for analysis in the EIS. - Draft Environmental Impact Statement – The draft EIS for this project was prepared with the following components, per NEPA, CEQ regulations, and NPS Director's Order 12: <ul style="list-style-type: none"> o Cover sheet, summary, table of contents o Purpose and need for action – This included a discussion of the purpose and significance of the National Park Service and Everglades National Park, the proposed action's purpose and need, the relationship to laws and other plans, the tribal and public involvement in the process, the impact topics that were selected for detailed analysis, and the impact topics that were dismissed from further analysis. o Alternatives - This included a description of the Action Alternatives and the No-Action Alternative. It also discussed alternatives considered but dismissed. Alternatives considered included alternatives without any additional bridging, such as the No Action Alternative, and alternatives ranging in bridge lengths from 1-mile (Alternative 4) to 5.5 miles (Alternative 6E).

Comment ID	Ref./Page No.	Comment	Response
			<p>o Affected environment – This described existing environmental conditions in the areas potentially affected by the alternatives. This section addressed the following impact topics: geologic resources/soils, water resources (water quality, hydrology, wetlands, and floodplains), wildlife and vegetation, land use, special status species, wilderness/unique ecosystems, cultural resources, visitor use and experience, park management and operations, noise/soundscapes, socioeconomics, transportation, and hazardous/toxic/radioactive waste.</p> <p>o Environmental consequences – This chapter presented the methods and analysis of the potential impacts for each topic under each alternative and the No-Action Alternative.</p> <p>o Environmental compliance for the preferred alternative - This portion of the EIS presented the cumulative impacts; unavoidable adverse environmental impacts; irreversible and irretrievable commitment of resources; relationship between local short-term uses of the human environment and the maintenance and enhancement of long-term productivity; effects on energy requirements and conservation potential; compatibility with federal, state, and local objectives; conflicts and controversy; uncertain, unique, or unknown risks; precedent and principle for future actions; environmental commitments; and environmental compliance.</p> <p>o Consultation and coordination - This chapter summarized the consultations undertaken in the preparation and review of this document, including the scoping process, public involvement, and agency and tribal coordination. It also included a list of document preparers who contributed to the draft EIS.</p> <p>o References and glossary</p> <p>- Agency/tribal coordination and public involvement – The NPS made the draft EIS available for public review for a 60-day comment period. During this time, the NPS welcomed comments from agencies/tribes and the public via PEPC, email, letter, park form, or any other reasonable method. The NPS also held a public meeting (advertised on the Park website and local newspapers), which was attended by over 100 participants, and an agency meeting to discuss any comments/issues from the agencies/tribes about the project. During this time, over 14,000 pieces of correspondence were received from the public and nine agencies/tribes provided formal comments on the project.</p> <p>- Final Environmental Impact Statement and Record of Decision – At this point in the process, the NPS will work to resolve any issues brought up by agencies/tribes or the public and incorporate appropriate revisions into the Final EIS. A Record of Decision for the Final EIS must be approved by the NPS Regional Director.</p>

Comment ID	Ref./Page No.	Comment	Response
N/A	II-A-4	<p>Contrary to NEPA, and requests by the Tribe, the Draft EIS fails to conduct an analysis of all reasonable alternatives. For instance, the reasonable culvert/swale/road raising alternative suggested by the Tribe was rejected from consideration even though NPS Staff reported that DOI Leadership Guidance includes the recommendation to "use con-span-like structures (prefabricated culverts) as potentially a more cost effective way to meet the Congressional intent to improve connectivity." Since con-spans are essentially large culverts, and culverts are technically small bridges, clearing out the exotic vegetation downstream of the existing culverts, and constructing additional culverts and swales, should have been evaluated in the Draft EIS as a cost-effective alternative to meet Congressional intent. It was not.</p>	<p>Culvert-only alternatives were evaluated and dismissed in previous MWD projects and in this project due to their inability to provide the volume, distribution, and timing of flows required for restoration of NESRS. According to the technical analysis in the SEIS for the 2005 RGRR, without more bridging "Future volume and culvert stage increase for the L-29C will reduce the roadway base clearance and likely cause roadway failure." (DEIS Engineering Appendix, page 2). Moreover, the USACE concluded in the 2005 RGRR that culvert-only alternatives would result in "adverse flooding impacts to adjacent properties and WCA-3B." The 2009 Omnibus Act specifically directed the NPS to investigate additional bridging to restore more natural water flow and improve ecological connectivity between WCA-3 and Everglades National Park. A culvert-only alternative would not provide natural water flow conditions or ecological connectivity.</p>
N/A	II-A-5	<p>NEP A requires that connected projects should be evaluated in a single Environmental Impact Statement (EIS). (40 C.F.R. § 1502.4). The Council on Environmental Quality ("CEQ") regulations governing NEP A further state that, proposals or parts of proposals which are related to each other closely enough to be, in effect, a single course of action shall be evaluated in a single impact statement. This improper segmentation has caused the Draft EIS to adequately assess impacts on Tribal lands and resources.</p>	<p>This project was authorized by Congress in the 2009 Omnibus Appropriations Act to "immediately evaluate the feasibility of additional bridge length, beyond that to be constructed pursuant to the Modified Water Deliveries to Everglades National Park Project (16 U.S.C. § 410r-S), including a continuous bridge, or additional bridges or some combination thereof, for the Tamiami Trail (U.S. Highway 41) to restore more natural water flow to Everglades National Park and Florida Bay and for the purpose of restoring habitat within the Park and the ecological connectivity between the Park and the Water Conservation Areas" [H.R. 1105: Omnibus Appropriations Act of 2009 ((P.L. 111-008, dated March 11, 2009)]. In contrast, the conceptual plan for Decomp and many other CERP projects were authorized in the 2000 WRDA, which is a separate piece of legislation largely directing the Army Corps of Engineers. The scope of the Decomp Project is all of WCA-3A and WCA-3B, while the scope of this project is just the 10.7 mile eastern corridor of the Tamiami Trail. Due to its separate authorization for study, it is entirely appropriate for NPS, as the agency authorized to complete the study, to analyze the additional bridging as directed by Congress separate and apart from the CERP DECOMP project which is the responsibility of the Army Corps of Engineers.</p>
N/A	II-A-6	<p>The Project Area analyzed in the Draft EIS was limited to only 10.7 miles along Tamiami Trail and a section of Everglades National Park. The Project and Study Area in which impacts were analyzed should have included the Water Conservation Areas (including WCA 3A) and western Miami-Dade County. The Study area in the Draft EIS should have included the WCAs, Northeast Shark River Slough and the Shark River Slough Basin of ENP. It did not. As a result, the narrow purpose and scope of the study area in the Draft EIS resulted in a flawed and incomplete analysis that omits issues of vital importance, such as the impact of the project and project delays on Tribal Everglades and the endangered and threatened species that inhabit these areas.</p>	<p>See Responses to Comments 1 and 2 on scope of the project. The FWS is updating their Biological Opinion (due September 14, 2010) on potential effects of this project on T & E species. The DEIS identifies only one T & E species, the wood stork, that would be adversely impacted by this project—approximately 4 acres of impacts to primary wood stork habitat in NESRS. However, based on preliminary FWS comments, the proposed modifications to the Tamiami Trail and subsequent improved ecological conditions in NESRS will fully mitigate for these impacts.</p>

Comment ID	Ref./Page No.	Comment	Response
N/A	II-A-7	The Cumulative Impact Analysis in the Draft EIS is woefully inadequate. It merely lists projects. It does not analyze their cumulative impacts. CEQ implementing regulations require that the cumulative impacts of past, present, and future actions be analyzed in an EIS. Unfortunately, Section 4.13 does not contain any meaningful analysis of the cumulative impact. Instead, the section merely reiterates NEP A requirements for a cumulative impact analysis, and discusses the history of the Everglades. It ignores vast areas of the Everglades, such as the Tribal Everglades in WCA 3A. They are simply not discussed. Neither is there discussion of how the projects will impact one another.	Since this project does not have an operational plan to deliver water to NESRS, it does not affect water levels or ecological conditions in WCA-3; however, the Cumulative Impact Analysis uses the best available information, including previous CSOP modeling and the 2005 RGRR, to evaluate potential effects of this project when added to other past, present, and reasonably foreseeable future actions as required by NEPA. Regional modeling conducted between 2003 and 2008 in development of CSOP and other MWD project components indicate the improved capacity to restore natural flow volumes and distributions to NESRS through bridging and road-raising the 10.7 mile eastern section of the trail will substantially improve ecological conditions in WCA-3 and Everglades National Park. This information is provided in the CIA Section.
N/A	II-A-8	Although Tribal representatives made NPS Staff aware that culverts could be blocked during construction to protect water quality in the Park, the NPS failed to analyze its impact on the flora and fauna of Tribal lands in WCA 3A, including the endangered Snail Kite.	Since the blocking of culverts will be dependent upon the final design specifications of the project, it is not yet known whether it will be necessary to block culverts during construction of this project. Therefore, if it is necessary to block culverts during construction, the impacts of such action will be addressed during the permitting phase of this project.
N/A	II-A-9	The Draft EIS fails to fully explain the concept of "unconstrained flows" that NPS has declared for the alternatives. The Draft EIS also fails to analyze whether these "unconstrained flows" will result in flooding of the Osceola Camp, private property, and Miami-Dade County, in general. Peak and annual flows should have been analyzed for each of the alternatives, including the increase in average annual flow into the Park that will result from a de facto change in operation from just building the bridge. The impact of these de facto changes was not adequately analyzed. Neither were the changes actually proposed. Instead, the NPS improperly rejected the volume performance measure for the Draft EIS. Without knowing the volume desired, and delivered, the EIS can not possibly analyze what is necessary. Neither can it adequately evaluate the actual impact on the environment.	The term "unconstrained flows" is used to describe conditions consistent with the Natural System Model (NSM) simulation of a fully restored Everglades where the Tamiami Trail no longer obstructs the natural flow of water between WCA-3 and Everglades National Park. The NSM functions as the restoration target for full restoration of flows and hydrological conditions in the Everglades. It does this by assuming all CERP projects are completed, including filling in the L-29 Canal and removing the L-29 Levee. Thus, water stages between WCA-3 and ENP are no longer controlled or constrained by water management practices (structures and operations) in the NSM simulation. Completion of this project will elevate the roadway to allow conditions consistent with the NSM. It is important to understand that "unconstrained flows" does not describe attainment of a water stage in NESRS. It simply reflects a future condition in which structure controls to manage stages in the L-29 Canal are no longer needed.
N/A	II-A-10	Since benefits to the Park cannot be realized until seepage out of the Park is controlled, seepage control should have been a component of the preferred alternative. It was not. Seepage to the east of the Park into the flood protected areas in western Miami-County must be controlled. Unfortunately NPS failed to even analyze seepage control in the Draft EIS. As stated above, this is especially disconcerting since the NPS has telegraphed that they intend to use these bridges under CSOP.	This project does not deliver any flows to NESRS or raise water levels in NESRS. The road-raising and bridging of the Tamiami Trail in this project provides the infrastructure necessary for the greater volumes of flows to NESRS and Florida Bay that will be possible one day when a number of CERP and non-CERP projects are completed. Without this project, all future CERP projects that restore flows to the southern and central Everglades cannot proceed. The updated CSOP will identify the volumes of flows to NESRS and antecedent water depths in NESRS that can be achieved with MWD flows and seepage management components in conjunction with CERP projects completed at this time. Completed MWD seepage management components include the C-111 detention areas, the S-356 pump station, and flood mitigation for the 8.5 SMA.

Comment ID	Ref./Page No.	Comment	Response
N/A	II-A-11	The Draft EIS states that the Project Purpose is the language in the Omnibus Appropriations Act which only directed DOI to evaluate the feasibility of additional bridge length. This language is also listed under Project Authorization. The language in the Omnibus Appropriation Act is not authorization to construct a project. The Tribe is concerned that the federal government will once again use language in an appropriations act to attempt to evade the requirements of NEPA and other applicable laws.	The decision to conduct an EIS was made by the National Park Service and the Department subsequent to direction from Congress which directed that the National Park Service "immediately evaluate the feasibility of additional bridge length, beyond that to be constructed pursuant to the Modified Water Deliveries to Everglades National Park Project (16 U.S.C. § 410r-S), including a continuous bridge, or additional bridges or some combination thereof, for the Tamiami Trail (U.S. Highway 41) to restore more natural water flow to Everglades National Park and Florida Bay and for the purpose of restoring habitat within the Park and the ecological connectivity between the Park and the Water Conservation Areas" [H.R. 1105: Omnibus Appropriations Act of 2009 ((P.L. 111-008, dated March 11, 2009)]. It was determined that the NEPA process, with its requirements for public input associated with the preparation of an environmental impact statement was the best way to involve local, state, and federal agencies, as well as Indian Tribes and public stakeholders to identify the modifications to the Tamiami Trail needed to fully restore flows and ecological conditions in NESRS, while also addressing potential adverse impacts to adjacent businesses, Tribal camps, cultural resources, and the environment consistent with the direction from the Congress to recommend additional bridging for the Tamiami Trail. The Department agrees that the language directing the preparation of this study is not an authorization for the project, however, and that for this project to go forward it must be authorized and funded by the Congress.
N/A	II-A-12	Tribal representatives were told repeatedly that there would be no time for modeling of the alternatives. However, the Draft EIS refers to a simplistic River Analysis Model in an attempt to provide some justification for the rushed analysis that was conducted. The Tribe continues to contend that the SFWMM 2x2 model should have been used to assess the benefits and impacts of alternatives on a larger study area. It is incomprehensible to the Tribe that the NPS is attempting to get more than \$300 million dollars for a series of bridges and has never analyzed the impact of operations, including with the 2x2 model.	While the Tribe and public was informed that there would not be new regional (SFWMD Model) modeling, the NPS stressed that the extensive regional and localized modeling that has been conducted in the last several years for other projects associated with modifications to the Tamiami Trail would be used to access potential benefits and impacts both within the footprint of the project and regionally, including WCA-3A. This assessment is contained in the Cumulative Impact Assessment Section of the DEIS (Chapter 4, section 1.3). Please see responses to Comments 1 and 2 for Tribal concern with operations.
N/A	II-A-13	Members of the Miccosukee Tribe live along Tamiami Trail, and their safety is of the utmost importance. The Draft EIS contains no details as to what will be done to ensure the safety of the Tamiami Trail. Nor are there any details on how adjacent Tribal property is going to be protected and preserved. Details on how the Park envisions this is to be accomplished are simply scant, at best. It is unclear whether the Corps or the Department of Transportation ("DOT") will construct the bridges and raise the road. There is no detailed engineering analysis of the road modifications and cost. Moreover, a review of the multiple on and off ramps and segments in the Preferred Alternatives also raises safety questions which have clearly not been reviewed.	The DEIS plans and specifications for the recommended plan are preliminary and more detailed specifications will be included in the final design, if authorized. The USACE has contracted an engineering firm, HNTB, to work closely with the FDOT to ensure that all modifications to the roadbed, during and after construction, will not pose any human safety risk, including any risk to the Indian camps located along the trail.
N/A	II-A-14	The Draft EIS contains a skewed, and incomplete, environmental benefits analysis that uses a reduced area of impact to analyze the impacts of alternatives only in the Park. It is improper to conduct a realistic assessment of the environmental impact of alternatives, if the analysis is improperly limited to a limited area in Everglades National Park when (as is the case here) the area actually impacted by operations of the bridges, will be much larger and includes Tribal lands in WCA 3A. This skewed analysis was used by the CBA advisory group in the screening of alternatives. It should not have been.	See response to Comments 1 and 2.

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N/A	II-A-15	<p>The Draft EIS does not contain an adequate analysis of the water quality impacts of the alternatives, including 6(e). This is especially important, because the bridges would be built in the Park, which is an Outstanding Florida Water ("OFW"). The DOI is a party to the Consent Decree in the federal Everglades lawsuit. Yet the Draft EIS only contains a general section on water quality and does not adequately analyze the impacts of the alternatives and/or de facto operations on water quality into the Park. Nor does it analyze whether Stormwater Treatment Area ("STA") or STAs may be necessary to meet water quality requirements. Neither does the Draft EIS mention the fact that the S-9 pump could discharge water into the Park under the MWD Project. All such factors should be considered.</p>	<p>See response to Comment 2 concerning operations. For all bridging alternatives (Alternatives 1-6E), soils and vegetation would be excavated in the bridging footprint during construction and long-term maintenance procedures would be implemented to permanently maintain the bridging footprint devoid of soils and vegetation. Best management practices would be implemented to minimize impacts to water quality resulting from construction and maintenance-related activities. Based on the results of the S-12D Flow-way Maintenance Plan water quality monitoring and the scope of the bridging projects, it is anticipated that the water quality impacts resulting from construction-related activities for all bridging alternatives would be local, minor, and short-term. Long-term effects to water quality resulting from operations remain unknown since an operational plan has not yet been developed for this project. Since a water operations plan has not yet been developed and is not being analyzed as part of this EIS, long-term effects to water quality would need to be assessed as part of any future project that implements an operational plan.</p>
N/A	II-A-16	<p>The Draft EIS also fails to adequately address the compatibility of the alternatives with Comprehensive Everglades Restoration Projects ("CERP") projects and non-CERP projects. Specifically, the Draft EIS fails to divulge the time frame in which these bridges would be used by any CERP or pre-CERP project. Since the modifications to the Tamiami Trail (which were supposed to be part of CERP Decompartmentalization) are being considered out of sequence, there is no way to assess if they will be compatible with the final design for CERP. The Draft EIS also fails to address or analyze whether the alternatives are compatible with the spreader swale pilot project.</p>	<p>Compatibility with future CERP projects is addressed in the Cumulative Impact Assessment. For example, the CIA states, "The hydrologic conditions of the area have been modeled on a regional scale, covering the entire south Florida ecosystem. As part of the modeling analysis, a set of performance measures was applied to ecological targets to predict the restoration benefits of the hydrologic improvements. The CERP models include fundamental assumptions about the future status of CERP and pre-CERP projects. CERP assumes that the Modified Water Deliveries to Everglades National Park (MWD) project would include modifications to the Tamiami Trail to allow essentially unconstrained flows to Northeast Shark River Slough, substantially improving the distribution, timing and volumes of flows to Everglades National Park. Due to cost constraints, the MWD project was unable to meet the MWD and CERP flow targets. The purpose of the Tamiami Trail Modifications: Next Steps project is to provide the additional modifications to the trail needed to meet the restoration objectives of both the MWD and CERP projects. No adverse environmental impacts are identified. The spreader swale pilot project is not a pre-CERP or CERP project; hence, knowledge gained from this pilot can be readily incorporated into future CERP projects.</p>

Comment ID	Ref./Page No.	Comment	Response
N/A	II-A-17	<p>It is difficult to believe that in the present critical fiscal climate, the DOI leadership would advise a regulatory agency that there should be NO COST CAP for the preferred alternative. Unfortunately, they did. This is not divulged in the Draft EIS. It should be. The public has a right to know. The public also has a right to know that even though another alternative provided a better benefit to cost ratio, and was more than \$100 million dollars less, NPS chose the most expensive alternative in a time of required fiscal restraint.</p>	<p>The NPS NEPA process incorporates the use of a Choosing by Advantages evaluation to identify the recommended plan. While no cost cap is placed on this evaluation, the preferred plan was determined to be the most cost-effective plan, i.e., "When the total project cost is plotted against the importance scores for all alternatives, the results produce a somewhat linear relationship between the variables, indicative of similar benefit-to-cost ratios; however, an inflection point for Alternative 2A indicates this alternative may provide the best cost-to-benefit value. Since it was unclear whether Alternative 2A was a true best value, or simply an artifact of the Choosing by Advantages scoring methodology, the National Park Service requested that the Corps apply the cost-benefit analysis technique commonly used in its project assessments. This evaluation resulted in all alternatives being characterized as cost effective, but Alternative 6E was determined to be a better value (most efficient) when compared to the other alternatives, including Alternative 2A. Therefore, the National Park Service Choosing by Advantages Importance Analysis, coupled with the Corps cost-benefit analysis, resulted in the decision to identify Alternative 6E as the preferred alternative."</p>
N/A	II-A-18	<p>Irreversible damage to the Everglades must be stopped. So must the governments' failure to comply with judicial mandates. Both will be rendered more adverse under the EIS Draft. Delay of important restoration projects will result. Money will be siphoned from restoration projects to fund the building of bridges that will not be used for years. All alternatives analyzed should have been looked at in terms of the cost of delay to the Everglades. The amount of time it would take to implement each alternative should also have been used as a performance measure. It was not.</p>	<p>The very specific language in the Omnibus Appropriations Act authorizing the preparation of this study and instructing the Corps to immediately construct the 2008 LRR plan, which was on hold delayed due to litigation, was predicated on the awareness of how endless delays in completion of the MWD project, which was authorized over 20 years ago, have contributed to chronic debilitating conditions in the remaining Everglades. The Draft EIS responds to direction from Congress related to recommendations for additional bridging for the Tamiami Trail for the purpose of restoring more natural water flow to the park and Florida Bay and for increasing the ecological connectivity between the park and the water conservation areas. The performance measures that were established to evaluate alternatives are adequate to determine the performance of each alternative in meeting these legislative requirements.</p>
N/A	II-B	<p>Section 4(t) of the Department of Transportation Act ("DOT") of 1966, which protects public lands and historic sites was codified without substantive change as 49 U.S.C. 303 in 1983. Congress declares that it is a national policy to preserve public park lands. Congress also prohibits the Department of Transportation ("DOT") from approving any program that uses publicly owned lands unless: 1) there is no feasible and prudent alternative, and 2) such use includes all possible planning to minimize harm. Nowhere in the Draft EIS does it discuss that Section 4(t) must be followed to build 5.5 miles of bridges in Everglades National Park. Nor does the Draft EIS discuss whether these Park lands will have to be transferred to construct the bridge. It is clear that Alternative 6(e) will use Section 4(t) lands. So, a Section 4(t) review is required. Yet, the Park contains no discussion of this requirement. The Tribe contends that a Section 4(t) review is required here, because the federal government plans to build 5.5 miles of bridges on national park lands. The Tribe suspects that the Park does not want to conduct a Section 4 (t) review, because it knows that such a review would show that there are feasible and prudent alternatives to constructing a bridge on these federal park lands.</p>	<p>Projects requiring FDOT approval or using FDOT funds may trigger the applicability of 4(f). However, this is not a FDOT project. This project is funded through the Department of Interior, and it does not involve approval by FDOT. Therefore, this project is not subject to 4(f) regulations, and a 4(f) evaluation is not required.</p>

Comment ID	Ref./Page No.	Comment	Response
N/A	II-C	The NPS failed to comply with the Endangered Species Act ("ESA") in that, among other things, it failed to conduct Section 7 consultation with the Fish and Wildlife Service ("FWS") on the impacts on Water Conservation Area 3A, and the endangered Snail Kite, as a result of constructing and operating the Preferred Alternative. The NPS has a duty to conduct Section 7 consultation with the FWS on the impacts that the Preferred Alternative will have on the Snail Kite and its critical habitat in WCA 3A. It failed to do so. Likewise, the FWS failed to issue a Biological Opinion ("BO") prior to the Draft EIS being issued. The NPS also failed to adequately analyze the impact that operations, including de facto operations, will have on other endangered and threatened species.	Section 7 consultation with the FWS has been officially initiated by the NPS (see page 6-5) on February 25, 2010 and is ongoing.
N/A	II-D	The so-called CBA Team discussed in the Draft EIS is a federal advisory group that screened alternatives, and made recommendations to NPS. Unfortunately, it did so, without complying with the Federal Advisory Committee Act ("FACA"). The advisory group included non-federal entities, who developed performance measures and screened alternatives at nonpublic meetings. This same advisory group also held a CBA Workshop. This group made recommendations to a federal agency. Yet, the NPS failed to follow the requirements of FACA when establishing and/or utilizing this advisory group.	The Unfunded Mandates Reform Act of 1995 allows representatives of Federal, State, local and Tribal governments to meet without triggering the requirements of the Federal Advisory Committee Act. The CBA team and Project Delivery Team (PDT) consisted of representatives from local, state, and federal agencies and did not include other representatives although representatives of the Miccosukee Tribe were present but not officially recognized as part of this group. Accordingly, because all of the members of the CBA team and the Project Delivery Team were representatives of Federal, State or local officials, the requirements of the Federal Advisory Committee Act were not triggered and the meetings that occurred met existing legal requirements.
N/A	II-E	DOI agencies, including NPS, have a Trust responsibility to the Tribe. Contrary to this Trust responsibility, the NPS failed to analyze a culvert/swale alternative in the Draft EIS despite requests from Tribal representatives to do so. The NPS also allowed a CBA advisory group to rate performance measures and give a low rating to cultural resources. The NPS also refused to analyze the impacts of the alternatives on Tribal resources in WCA 3A, including from construction, operations and de facto operations, despite repeated requests that it do so. The NPS has a solemn trust responsibility: (1) to protect Tribal natural resources; (2) to preserve Trust resources; and (3) to maintain all such property in its "natural state." As a result, the NPS should have analyzed the impacts of the alternatives on Tribal lands. Finally, the NPS should have analyzed alternatives that did not require the destruction of lands in Everglades National Park to which the Tribe has customary use and occupancy rights. Again, the NPS failed to do so.	In carrying out the requirements for the study as directed by the Congress, the NPS fully met its obligations to the Miccosukee Tribe (the Tribe). The NEPA process which the NPS follows (outlined in NPS Director's Order 12) welcomes agency/tribal and public coordination/involvement throughout the NEPA process. As outlined in the response to Comment 3 above, the agencies/tribes and the public were involved throughout the NEPA process. The Tribe was invited to participate in the Project Development Team (PDT), an inter-agency/Tribal team assembled to help develop the DEIS, where they participated in each of the PDT meetings, even though they did not wish to be recognized as members of this team. In addition, the Tribe participated in the internal and public scoping process where they provided comments that are summarized in the Scoping Report and addressed in the Draft EIS for this project. The Tribe also provided comments on the Draft EIS, for which these responses are being provided.
N/A	III-A	The Draft EIS contains no modeling or analysis of the impact that the operation of the Preferred Alternative will have on Tribal lands. The NPS must analyze the impact that operations will have on the MRA, other Tribal properties, and, on the Tiger Tail and Osceola Camps.	See response to Comments 1 and 2.
N/A	III-B	The Draft EIS does not assess the impact that both construction and operation of Alternative 6(e) would have on Tribal businesses, such as the Miccosukee Resort and Gaming Facility, and the Tribe's Miccosukee Indian Village, Airboats, Restaurant, and Gas Station along Tamiami Trail. It should.	See response to Comments 1 and 2 concerning operations. The DEIS will allow continued access to the Tribal businesses during construction.

Comment ID	Ref./Page No.	Comment	Response
N/A	III-C	Tamiami Trail is the only hurricane evacuation route for Tribal members who live along it. Since the Miccosukee Tribal members and others in the Service Area use Tamiami Trail to travel across the Everglades, it is vital that the NPS conduct an analysis of the impact that a one lane evacuation route would have on hurricane evacuation capability in the Final EIS. Access must be maintained to protect the health and safety of both Tribal members and the public.	In 1999, the Governor's Hurricane Evacuation Task Force identified seven limited access routes in south Florida with a potential "need to reverse" to enhance regional evacuations (FDOT web site). U.S. 41 (Tamiami Trail) is not one of the designated routes; the closest designated east-west, coast-to-coast hurricane evacuation route (with a need to reverse lane) is Interstate Highway 75 (Alligator Alley), which is located approximately 20 miles to the north. However, because of its location as the southernmost east-west artery across the state, Tamiami Trail provides coast-to-coast access between Miami and Naples and would undoubtedly be used for hurricane evacuation, if necessary, but traffic would be maintained in both directions.
N/A	III-D	The Draft EIS states at Appendix G that it has been determined that project implementation will cause an increase in water elevations south but it does not adequately analyze the impact on real estate. Nor does the Draft EIS adequately assess all real estate costs that will result from the Preferred Alternative. The Draft EIS states that the costs of real estate "may vary drastically." It is the responsibility of the NPS to assess some costs, and add them to the costs of the bridges to fully evaluate impacts and costs in the Draft EIS.	<p>Total implementation costs for all alternatives were estimated and included the following (see Table 2 in the Real Estate Appendix for detailed cost figures):</p> <ul style="list-style-type: none"> • Construction costs — includes all costs for materials and labor for construction of bridges and road improvements to the portion of the project area not containing bridges • Real estate costs — includes all costs for the in-fee acquisition of three commercial airboat facilities, two commercial radio towers currently operating within the park, the relocation of a radio tower facility operated by the South Florida Water Management District, a flowage easement for a private airboat facility, as well as additional costs associated with business impacts and required demolition • Management Costs — includes engineering and design (estimated at 10 percent of the construction costs), construction management (estimated as 10 percent of the construction costs), and contingency or potential error in the cost estimate (estimated at 25 percent of the construction costs).
N/A	III-E	Tribal representatives were told repeatedly that there would be no time for modeling of the alternatives. However, the Draft EIS refers to a simplistic River Analysis Model in an attempt to provide some justification for the rushed analysis that was conducted. The Tribe continues to contend that the SFWMM 2x2 model should have been used to assess the benefits and impacts of alternatives on a larger study area. It is incomprehensible to the Tribe that the NPS is attempting to get more than \$300 million dollars for a series of bridges, but has never analyzed the impact of operations, including with the 2x2 model.	See response to Comments 1 and 2 concerning operations. The River Analysis Model is a simple, steady-state, surface water flow model used to identify how well different bridging alternatives equitably distribute flows across the 10.7 section of eastern Tamiami Trail.