



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

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Colonel Alan M. Dodd
Commander
United States Army Corps of Engineers
Jacksonville District
P.O. Box 4970
Jacksonville, Florida 32232-0019

Dear COL Dodd:

Thank you for the opportunity to review and provide comments on the *CENTRAL EVERGLADES PLANNING PROJECT DRAFT INTEGRATED PROJECT IMPLEMENTATION REPORT AND ENVIRONMENTAL IMPACT STATEMENT* (Draft PIR/EIS), dated August 2013. The Department of the Interior (Department) supports the Recommended Plan as contained in the Draft PIR/EIS. The Central Everglades Planning Project (CEPP) will provide meaningful steps toward restoration of the central Everglades, Everglades National Park (ENP) and coastal estuaries. The Department supports continuing forward with the CEPP approval process on an expedited schedule. The Department lauds the U.S. Army Corps of Engineers (Corps) for including the Central Everglades Planning Project (CEPP) as one of seven national pilot projects designed to improve the Federal planning process by significantly reducing the timeframe and process necessary to develop a Corps feasibility study. Successful restoration of the Everglades is contingent on streamlining both this timeframe and process. The Department, like the Florida Department of Environmental Protection (FDEP), would like to see the streamlining of both the timeframe and process for Corps feasibility studies utilized in this pilot program become a national practice for Corps feasibility studies.

The Department appreciates the progress that has been achieved in authorizing and implementing several Comprehensive Everglades Restoration Plan (CERP) projects located primarily on the periphery of the Everglades. The CEPP is the first major CERP project aimed at addressing ecological conditions and functions within the central portion of the Everglades, from ridge, slough, and tree island communities down through southern estuaries, all of which continue to decline due to lack of sufficient quantities of freshwater flow, obstructions to sheetflow, and altered flow timing and distribution problems. The purpose of the CEPP, which is comprised of multiple CERP components, is to identify and recommend an initial increment of restoration benefits by reducing damaging freshwater discharges from Lake Okeechobee to the St. Lucie and Caloosahatchee estuaries while restoring flows southward through the central Everglades to Florida Bay. This work is essential to restore or improve the central portion of the Everglades ecosystem (with component wetlands, uplands, and estuaries), including its water quality, habitats, and wildlife, while sustaining water supply, flood control, and cultural resources and values.

The Recommended Plan

The recommended plan, Alternative 4R2, when combined with ongoing non-CERP and planned CERP projects, addresses the primary objectives of Everglades restoration, which include expanded water storage, water quality treatment, improved conveyance, and seepage management. The CEPP recommended plan is comprised primarily of refined components of original CERP features including: the Everglades Agricultural Area Storage Reservoirs (CERP Component G), Water Conservation Area (WCA) 3 Decompartmentalization and Sheetflow Enhancement (CERP Components AA and QQ), S-356 Pump Station Modifications (CERP Component FF), L-31 Levee Seepage Management (CERP Component V), System-wide Operational Changes - Everglades Rain-Driven Operations (CERP Component H), and Flow to Northwest and Central WCA 3A (CERP Component II). The well-balanced Alternative 4R2 recommended plan was made possible by the innovative development and application of many cutting edge assessment and modeling tools, and the adoption of a highly inclusive planning process combining inter-agency project teams with regular stakeholder workshops. The Department commends the Corps and South Florida Water Management District (SFWMD) for these efforts.

Regional Environmental Benefits

- *Benefits to the Upstream Everglades Watershed*

The recommended plan provides **significant** environmental benefits across much of the South Florida Ecosystem, including to numerous land, water and wildlife resources for which the Department has management, stewardship and/or regulatory responsibilities. Alternative 4R2 will provide benefits in the upstream Everglades watershed by reducing the number and severity of harmful, high-volume discharges from Lake Okeechobee to the northern estuaries, and re-directing these flows back into the historical southern flow path. This will improve the overall salinity and nutrient conditions in the St. Lucie and Caloosahatchee estuaries. In addition to redistributing the existing treated water that enters WCA 3A in a more natural sheetflow pattern, the CEPP recommended plan will provide an average of approximately 210,000 acre-feet per year of additional clean freshwater flowing into and through the central Everglades. The Draft PIR/EIS states that this increase in freshwater flow to the Everglades represents approximately two-thirds of the additional flow estimated to be provided by the CERP. A key premise of Everglades restoration has always been that the best available scientific information will guide planning and decision-making. It is important to note that after the authorization of CERP, a scientific consensus developed (in part via scientific workshops convened by the Science Coordination Group and the CEPP interagency science team) that increased flows of freshwater, over and above the CERP estimate, are needed to re-establish more natural marsh water depths and flooding durations, as well as salinity patterns in the southern estuaries. The CEPP recommended plan represents an important first increment toward our longer-term efforts to restore the historic flow connection between Lake Okeechobee and the downstream Everglades.

- *Benefits to the Central and Southern Marsh Habitats*

The Draft PIR/EIS recognizes that large regions of the central and southern Everglades have been degraded in response to drainage, altered flow patterns, and the loss of sheetflow. The combination of CEPP recommended incremental levee removal, canal back-filling, and additional water flowing into

northern WCA 3A, WCA 3B, and ENP will help to reverse the overly-dry conditions that have contributed to peat oxidation, increased fire intensities, and invasions by woody vegetation. The recommended plan also includes significant infrastructure and operational improvements to ensure that water flows through the Everglades, thereby reducing the likelihood and severity of harm caused by prolonged ponding, such as in southern WCA 3A. By slowing changing water flow patterns and increasing water volumes we can begin to restore the pre-drainage vegetative communities and habitat that are critical to supporting native populations of fish and wildlife. This will also afford incremental restoration of the natural processes critical for the development of peat soils and tree islands, which are essential features of the ridge, slough, and tree island landscape of the Everglades.

- *Benefits to the Southern Estuaries*

The embayments and nearshore areas of Florida Bay currently experience wide seasonal fluctuations in salinities and frequent peaks of damaging hyper-salinity. With increased freshwater flows through ENP and into the southern estuaries of Florida Bay we expect modest improvements in nearshore salinities in Central Florida Bay. The CEPP recommended plan shows a significant reduction in salinity in these areas, which should result in greater abundance and diversity of seagrass habitat and will benefit animal populations (including important recreational fishery species) that depend on this habitat, and are harmed by high salinity. Within the nearshore areas of Biscayne Bay, recent operational changes have been implemented that redirect additional available freshwater into the southern Miami-Dade coastal canal system. These small flow changes appear to temper high salinity events and lengthen the beneficial salinity window as the region transitions into the dry season. These operational flow improvements should be sustained and, where possible, expanded through the implementation of the CEPP and the Biscayne Bay Coastal Wetlands project. In addition, the Department recommends that the CEPP Adaptive Management Plan include an acknowledgement of the importance of maintaining beneficial freshwater flows to Biscayne Bay.

Incremental Progress, Adaptive Management and Ecological Monitoring

The Department notes that the sequential improvements from the combination of ongoing pre-CERP projects (such as the Modified Water Deliveries and C-111 South Dade projects) and the CEPP will incrementally improve water flows and marsh water depths in the Everglades and downstream estuaries over time. This incremental approach will give the ecosystem time to adjust to these changes. The CEPP recommended environmental monitoring program (as envisioned in the CEPP Adaptive Management and Ecological Monitoring Plans (Annex D)) is a critically important to tracking the health of key ecosystem features. The Department recommends that the Corps also implement a robust endangered species monitoring plan and assess the results in coordination with the U.S. Fish and Wildlife Service and other wildlife agencies to allow timely modifications to project operations for the protection of those species. Given the uncertainty and risk associated with mercury in the Everglades, the Department recommends additional monitoring and assessment at major project features and in associated downstream systems, beyond Annex D's sole specification for monitoring the A-2 Flow Equalization Basin (FEB).

The Department is committed to working with its bureaus and all partner agencies to ensure that wise and efficient resource investments are made to provide incremental progress towards meeting the goals of CERP, and restoring the central Everglades and downstream estuaries.

Water Quality

The suite of projects proposed in the CEPP Draft PIR are dependent on the existing system of stormwater treatment areas (STAs) in the Everglades Agricultural Area, as well as the proposed A-1 FEB in the central flow path of the State's Everglades Water Quality Restoration Strategies Plan (Restoration Strategies). The Department commends the State for their commitment to complete the Restoration Strategies plan and to commit the funding necessary to implement this \$880 million plan. Once the Restoration Strategies and CEPP features are implemented, they should provide both hydrologic and water quality benefits to significant portions of the Everglades Protection Area (EPA), and northern and southern estuaries. The recommended CEPP features will improve the function and capacity of the STAs by increasing the acreage of FEBs, distributing flows to WCA 3A with sheet-flow over its northwestern marshes, which have been damaged by decades of drainage, and reducing the short-circuiting of southward flows by the Miami Canal.

The CEPP Draft PIR/EIS acknowledges that there may be some concerns that the redistribution of additional water in the Everglades could cause compliance problems related to the Consent Decree in the *United States of America vs. South Florida Water Management District, et al* (Consent Decree). These would likely be temporally and spatially limited impacts as a result of construction and stabilization activities. The combination of Restoration Strategies and the CEPP proposed projects should result in long-term water quality improvements throughout the affected areas of the EPA, including lowering the flow-weighted mean total phosphorous (TP) concentration entering the ENP. The Department lauds the efforts of the State of Florida and the Federal government in negotiating an agreed-upon framework to address water quality issues that may occur as a result of the implementation of CEPP. The Department concurs with the FDEP that the Draft PIR/EIS, as currently written, provides the appropriate framework to address water quality issues that may occur as a result of the implementation of CEPP.

Component Sequencing

The Department agrees with the State of Florida that although the implementation schedule requires refinement and optimization, this need not and should not delay completion of the PIR/EIS and submittal to the Congress for authorization. The implementation schedule should be flexible to allow changes in the sequencing of CERP projects (including the CEPP components) and non-CERP projects and activities as appropriate. Flexibility is essential to successful CEPP implementation given the uncertainties associated with the lengthy implementation period and the inevitable improvement in scientific knowledge about the functioning of the greater Everglades and estuaries that will occur as planned CERP and non-CERP projects and activities are completed. The Department recommends that the Corps explicitly acknowledge, in the PIR/EIS, the importance of such flexibility.

The well documented history of high water problems in southern WCA 3A is a good example of how modest refinements in CEPP project sequencing *could* be used to address adverse ecological conditions more quickly than the CEPP component sequencing currently proposes. As the CERP/CEPP planning

process moves forward, the Department will recommend at the appropriate time that the Corps adjust the timing of conveyance and seepage management features around Tamiami Trail to move toward earlier implementation of WCA 3A outflow capacity improvements to convey existing water southward during times of high rainfall. The State's recent commitment to jointly fund the 2.6-mile Tamiami Trail Bridge (the first increment of the Tamiami Trail Next Steps project) creates a unique opportunity to pull several, relatively low cost CEPP southern conveyance and seepage management features (S-333N, the S-355W/L-29 divide structure, and the removal of Old Tamiami Trail) forward and make faster progress on improving the conditions in both WCA 3A and Northeast Shark River Slough. The current CEPP implementation schedule assumes that these features will not be implemented for approximately 15-20 years, while our Tamiami Trail Next Steps first increment efforts would presumably have the western portion of the Tamiami Trail flow-ready 5-10 years earlier. We acknowledge that moving these CEPP conveyance and seepage management features earlier would require completion of upstream water quality improvements (specifically the A-1 FEB). Fortunately, the A-1 FEB is currently scheduled to be on-line by approximately 2019, which should either coincide with or precede the completion of Tamiami Trail Next Steps first increment. We also believe that we would gain significant additional public support for, and alleviate stakeholder concerns about, the upstream WCA 3A hydropattern restoration improvements by focusing on addressing the current WCA 3A high water problems and generally on increasing WCA 3A outflow capacity prior to increasing inflow capacity.

Another example of beneficial sequencing flexibility is the implementation of the L-31N seepage barrier in the CEPP, which is currently included in phase 7 (contract 10), or near the end of the CEPP implementation. The CEPP recommended plan conservatively included a seepage barrier of the length and depth necessary for CEPP project seepage management requirements, in the event the barrier must be constructed as part of CEPP. The recently completed 2-mile L-31N seepage barrier project constructed by the Miami-Dade Limestone Products Association (Association), as mitigation for seepage increases caused by rock mining, is currently being analyzed. If this segment of the seepage barrier shows positive results, then it is anticipated that the Association will construct, for additional mitigation credit, the remaining 3 to 5 miles of seepage wall to extend this seepage barrier south, as required by the *Final Supplemental Environmental Impact Statement on Rock Mining in the Lake Belt Region of Miami-Dade County, Florida*, dated May 2009. This non-CERP approach could pull these features forward to correspond with the general completion of the Tamiami Trail Next Steps first increment, or approximately 15-20 years earlier than is currently anticipated in CEPP. This possibility should be examined in future revisions to the sequencing schedule.

Establishing Clear Restoration Goals for Biscayne National Park and Biscayne Bay

It is important for CEPP to maintain the existing beneficial freshwater flows to Biscayne National Park (BISC) and the broader Biscayne Bay. Modeling for CEPP indicates that the recommended plan produces a small reduction in wet season canal discharges to the Bay, which can be beneficial, particularly if this freshwater can be redirected into the Biscayne Bay coastal wetlands. We commend the Corps and SFWMD for sustaining the more critical dry season flows, and focusing on smoothing out the seasonal change in flows. The Department recommends that further improvements in freshwater flows to BISC and Biscayne Bay be included in the next increment of CEPP, as most of the Bay is designated as an Outstanding Florida Water (OFW). These important coastal ecosystems depend on freshwater inflows

from the Lower East Coast canal system to sustain current habitats and salinity regimes. Additional freshwater will be needed to meet our established restoration targets and to achieve the full benefits of the CERP Biscayne Bay Coastal Wetlands project features. Restoration goals for future CEPP increments and system-wide operational modifications that increase the historic flow connection between Lake Okeechobee and the Everglades, should include extending the transition from the wet season to the dry season and increasing freshwater flows to Biscayne Bay. As an example, the supplemental deliveries to the south Miami-Dade canal system in water year 2013 were a critical component of providing more freshwater to the Bay and BISC, and they highlight the benefits that supplemental dry season flows can have in the Bay.

Modified Water Deliveries to Everglades National Park

The Modified Water Deliveries Project (MWD) is an essential part of the restoration of Everglades National Park, and the completion of MWD is one of the Department's top priorities. The physical features of the MWD project are either completed or under construction, and in any case will be completed by the spring of 2014. However, the Corps has not yet established a timeline for the development of the Water Control Plan (WCP) that is necessary to operate the physical features of MWD. While the completion of MWD is not a precondition for CEPP authorization, as CEPP moves toward authorization this spring, the Department urges the Corps to work with the Department, FDEP and the SFWMD to initiate the development of a WCP so that MWD features are operational as soon as possible and long before the *construction* of WCA 3 decompartmentalization and sheetflow enhancement features of CEPP.

The Department and its bureaus were extensively involved in the planning and development of the CEPP recommended plan and Draft PIR/EIS, and we look forward to continuing to work with the Corps and the SFWMD as we move toward authorization and implementation of CEPP and future phases of CERP.

Sincerely,



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