



Everglades Coalition

February 20, 2020

Melissa Nasuti
U.S. Army Corps of Engineers
Jacksonville District
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Jacksonville, FL 32232
Melissa.A.Nasuti@usace.army.mil

Re: COP Draft EIS Comments from the Everglades Coalition

Dear Ms. Nasuti:

On behalf of its 62 member organizations committed to the protection and restoration of America's Everglades, the Everglades Coalition submits the following comments on the Draft Environmental Impact Statement (EIS) for the Combined Operational Plan (COP).

COP is the long-awaited operations guide to utilize restoration infrastructure that has been constructed to deliver clean, freshwater to Everglades National Park (ENP) and Florida Bay. These projects include the Modified Water Deliveries Project, C-111 South Dade, C-111 Spreader Canal, and bridged portions of Tamiami Trail. For decades, member organizations of the Everglades Coalition have worked to support the planning, funding, and construction of these projects to further our shared goal of delivering more freshwater south to ENP and Florida Bay, and for the overall health of the Greater Everglades ecosystem.

Unfortunately, the preferred alternative presented in the Draft EIS does not deliver ecosystem benefits that are desperately needed to restore the Everglades, failing to:

1. Deliver more water to Everglades National Park and Florida Bay, especially during the dry season and droughts. The current COP preferred alternative underperforms especially during drought and towards the end of the dry season, exactly when water need is the greatest in the Southern Everglades.
2. Stop the harmful practice of discharging water to tide, which impacts Florida Bay and Biscayne Bay. The "Extreme High-Water Line" operations adopted in the preferred COP alternative continue to rely on this detrimental practice, further exacerbating the lack of dry season water flows.

1000 Friends of Florida
Angler Action Foundation
Audubon Florida
Audubon of Southwest Florida
Audubon of the Western Everglades
Audubon Society of the Everglades
Backcountry Fly Fishers of Naples
Calusa Waterkeeper
Cape Coral Friends of Wildlife
Center for Biological Diversity
Conservancy of Southwest Florida
Defenders of Wildlife
"Ding" Darling Wildlife Society
Earthjustice
Environment Florida
Everglades Foundation
Everglades Law Center
Everglades Trust
Florida Bay Forever
Florida Conservation Voters Education Fund
Florida Defenders of the Environment
Florida Keys Environmental Fund
Florida Native Plant Society
Florida Oceanographic Society
Friends of the Arthur R. Marshall
Loxahatchee National Wildlife Refuge
Friends of the Everglades
Hendry-Glades Audubon Society
International Dark-Sky Association,
FL Chapter
Izaak Walton League of America
Izaak Walton League Florida Division
Izaak Walton League Florida Keys Chapter
Izaak Walton League Mangrove Chapter
Lake Worth Waterkeeper
Last Stand
League of Women Voters of Florida
Martin County Conservation Alliance
Miami Pine Rocklands Coalition
Miami Waterkeeper
National Audubon Society
National Parks Conservation Association
National Wildlife Refuge Association
Natural Resources Defense Council
North Carolina Outward Bound School
Ocean Research & Conservation Association
Peace River Audubon Society
Reef Relief
Sanibel-Captiva Conservation Foundation
Sierra Club
Sierra Club Florida Chapter
Sierra Club Broward Group
Sierra Club Calusa Group
Sierra Club Central Florida Group
Sierra Club Loxahatchee Group
Sierra Club Miami Group
South Florida Audubon Society
Southern Alliance for Clean Energy
The Florida Wildlife Federation
The Institute for Regional Conservation
The National Wildlife Federation
Theodore Roosevelt Conservation
Partnership
Tropical Audubon Society

Committed to full protection and restoration of America's Everglades

American taxpayers have funded projects operated under COP with over \$1 billion over the course of several decades. These projects – authorized by Congress for the benefit of federal lands and waters that belong to all Americans – were intended to relieve the Southern Everglades and Florida Bay from extreme drought conditions and high salinity that caused widespread seagrass die-offs in the late 1980s and again in 2015. Delivering more freshwater during the dry season is of utmost importance for the health of the ecosystem and the surrounding communities.

We appreciate that current alternative does offer benefits to ENP and is a step in the right direction. Increased flow to Northeast Shark River Slough is a positive development and will provide much-needed relief to that area of the park. However, COP delivers most of the increased flow during Florida’s rainy months, when water is already abundant in the system. **We urge the Army Corps to revisit opportunities to flow more freshwater south to ENP during the dry months between October and April, when the Southern Everglades and Florida Bay are most susceptible to harm.**

As currently written, COP does not improve ENP and Florida Bay’s resiliency to drought. Instead, ENP and Florida Bay will continue to be vulnerable to seagrass die-offs and fish kills until Central Everglades Planning Project (CEPP) South components are constructed – at least seven years from now. Congress charged the Army Corps with drafting an operations plan that delivers significantly more water than the previously guaranteed minimum flows to ENP year-round. The alternative as presented in the Draft EIS does not ensure that Congressionally mandated minimum flows for ENP will be met in times of severe drought.

Moving freshwater south is critical to the health of the Greater Everglades ecosystem, from the northern estuaries to the Florida Keys. Having infrastructure to move more water south to ENP and Florida Bay can help alleviate damaging Lake Okeechobee releases that harm the Caloosahatchee and St. Lucie estuaries. COP is our roadmap to success as we implement CEPP, but it cannot fall short of Congress’ mandate to meet minimum deliveries for ENP and rely on CEPP to meet that threshold. Minimum deliveries represent the absolute floor, and CEPP aims to go above that mark.

With the significant \$1 billion investment by American taxpayers, COP must go farther in achieving significant progress for the health of the Greater Everglades. Instead, the final COP alternative in the Draft EIS includes only marginal benefits for the ecosystem. As such, the Everglades Coalition urges the Army Corps and its agency partners (including South Florida Water Management District, National Park Service, U.S. Fish and Wildlife Service, and Florida Fish and Wildlife Conservation Commission) to reevaluate the Draft EIS and find ways to increase ecosystem benefits for the Everglades Florida Bay, particularly during the dry season, before COP is finalized.

Thank you for your consideration of our comments.

Sincerely,



Mark Perry
Co-Chair



Marisa Carrozzo
Co-Chair

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