August 1, 2014

Eric Summa, Environmental Branch Chief
Planning and Policy Division
U.S. Army Corps of Engineers
701 San Marco Boulevard
Jacksonville, Florida 32207

Dear Mr. Summa:

On behalf of the Everglades Coalition, an alliance of 55 local, state and national conservation and environmental organizations committed to the restoration of the Greater Everglades Ecosystem, we are writing to call upon the U.S. Army Corps of Engineers to reconvene a CERP Interagency Manatee Task Force to update the 2006 “Guidelines for Manatee Conservation during Comprehensive Everglades Restoration Plan Implementation (the Guidelines).”

Much of the content in the Guidelines has become dated at this point. With more CERP projects coming on line since the document was produced, it is vitally important to update the Guidelines to enable greater interagency coordination to protect manatees during construction and implementation of CERP projects. Starting with the contact information for the CERP Manatee Task Force Members, most of the people listed are no longer in these positions. Furthermore, the Appendix for “Observers, Standard Manatee Construction Conditions, Thermal Guidelines, and Blasting” are all out of date and new information is available. In addition, the maps that are included in the document are still used, but they need to be reviewed and revised as changes have been made during the implementation of CERP and other projects in this region that may have altered some of the areas that are identified as accessible or non-accessible areas for manatees. Inaccurate information could result in entrapment, injury or death to manatees.

A general update would greatly benefit users of this document and could probably be undertaken relatively easily if the Corps could assemble a temporary working group to take on the task. The Florida Fish and Wildlife Conservation Commission (FWC) would be willing to participate and the U.S. Fish and Wildlife Service would also provide staff participation in the working group. Several other agencies, including the South Florida Water Management District, Miami-Dade County Department of Environmental Resources Management, U.S. Geological...
Survey and Everglades National Park, may be needed to participate at least to some degree.

Ron Mezich of FWC will include updating the Guidelines on the agenda at the next Water Control Structure Task Force meeting on August 28.

As the manatee is an integrally important species in the Greater Everglades, protections must remain in place to safeguard against harm. We appreciate your consideration of our request to update the Guidelines to protect manatees.

Sincerely,

Cara Capp
National Co-Chair

Jason Totoiu
State Co-Chair