

May 10, 2022

April Patterson, Project Manager
Biscayne Bay and Southeastern Everglades Ecosystem Restoration
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Brenda Mills, Project Manager
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South Florida Water Management District
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Re: Biscayne Bay and Southeastern Everglades Ecosystem Restoration (BBSEER)

Dear Ms. Patterson, Ms. Mills, and Members of the Project Delivery Team (PDT):

The undersigned organizations write to provide comments on the three BBSEER alternatives presented at the most recent PDT meeting on March 29, 2022. BBSEER combines multiple components of the Comprehensive Everglades Restoration Plan (CERP), including Phase II of the Biscayne Bay Coastal Wetlands (BBCW) and the C-111 Spreader Canal Eastern (C-111 SCE) projects. Our organizations have long advocated for these projects, given the great benefits they will provide to Biscayne Bay, Biscayne National Park, Everglades National Park, Florida Bay, the Florida Keys National Marine Sanctuary, and surrounding waters and ecosystems. BBSEER has the potential to deliver on significant, long-awaited benefits to the Southern Everglades; we are grateful that project planning has resumed with the support of significant state and federal resources to ensure that the final outcome is a plan that will deliver on the full array of ecosystem benefits outlined in CERP.

We appreciate that all three of the alternatives presented at the March 29th PDT meeting – Alternatives 11, 12, and 13 – include backfilling of the lower C-111 canal. Our organizations continue to assert that backfilling of the lower C-111 is critical for Florida Bay and Biscayne Bay. The current operations of the C-111 canal has serious impacts on the health of both Everglades and Biscayne National Parks; the canal diverts high volumes of freshwater away from coastal wetlands and deposits the flow in an artificially high proportion into extreme northeastern Florida Bay. This results in disruptions in natural salinity levels that are detrimental to wildlife and overall ecosystem health. BBSEER must deliver on the C-111 SCE objective outlined in CERP: fill the southern portion of the canal and replace it with an east-west “spreader” canal to better manage both flood protection and water distribution in the Southeastern Everglades. Backfilling of the lower C-111 will also allow for operational changes that our groups have been requesting for decades: eliminate the artificially low water levels at the S-18C and to end harmful discharges at the S-197. By removing the lower portion of the C-111, these long-awaited ecological improvements can finally be achieved in BBSEER.

As BBSEER planning and modeling continues, we look forward to reviewing more detail about project specifics so that we can provide thorough feedback on the plan alternatives. Such important information will include an accurate depiction of where backfill of the lower C-111 canal will start and stop, and an exact alignment of the proposed spreader canal. These important factors are not shown clearly on the maps shown at the March 29th PDT meeting. Furthermore, as modeling results become available, we urge the agencies and the PDT to pursue the combination of project features and components that provides the greatest ecosystem benefits.

Further, we want to emphasize that water quality remains a central concern for both Florida Bay and Biscayne Bay. While the volume, timing, and distribution of water flow are critically important aspects of Southern Everglades restoration, understanding how adjustments to flow will impact water quality is also critical. We urge the PDT to provide stakeholders with a clean understanding about how water quality will be ensured throughout BBSEER planning and in the final plan.

In particular, we look forward to reviewing additional information about the proposed “northwest chain of wetlands” feature in alternatives 11 and 13, alone and in combination with the Kendall mine storage feature. We are encouraged to see modeling of these options to move water through the Pennsuco wetlands and Bird Drive basin to southern parts of the Everglades ecosystem and Biscayne Bay. We support these efforts, including efforts to evaluate water quality implications. We also support efforts to evaluate alternatives to problematic agricultural drawdown operations in the southern part of the system. Although dewatering wells in agricultural zones would likely – on their own – have adverse effects to environmental resources in the Everglades similar to those associated with agricultural drawdown operations, *in combination with* redistribution of the flows effectively intercepted by the wells, they may be a preferable option.

In addition to backfill of the lower C-111 canal, the other critical project goal of BBSEER – and one that remains unquantified – is addressing the dire need to deliver more clean, freshwater to Biscayne Bay during the dry season. We understand that the PDT continues to explore all options for increasing water flow including operational changes, redistribution features, and wastewater reuse. **We strongly urge the PDT to thoroughly assess opportunities for natural storage features in southern Miami-Dade County as the preferred method of securing new water.** Undertaking a comprehensive real estate assessment of the study area will be critical to understanding the capacity to store freshwater to benefit Biscayne Bay and Florida Bay. Should the PDT move forward with considering wastewater reuse in the suite of alternatives, we urge the PDT to prioritize advanced wastewater treatment for reuse options to protect water quality in and around the project footprint.

Our organizations have supported a number of CERP efforts over the years, and we appreciate the partnership of USACE and SFWMD in advancing key projects to protect and restore the ecosystem. As BBSEER moves forward, we ask the PDT to ensure that organizations like ours – and other engaged stakeholders and members of the public – can productively participate in project planning by advertising PDT and other planning meetings with at least one week notice, and providing meeting materials ahead of time. This will ensure that we can review new information and be prepared to provide feedback to PDT members during the limited public comment opportunities.

Our organizations remain committed to the protection and restoration of America’s Everglades, including Everglades National Park, Biscayne National Park, and the Florida Keys National Marine Sanctuary and we appreciate that BBSEER seeks to improve ecological conditions for these critical protected areas. We recognize the challenges presented by combining multiple CERP projects; however, it is critically important that the complexity of the process not detract from achieving the full ecosystem benefits envisioned in each project. Thus, we look forward to remaining engaged throughout BBSEER planning to ensure the result of this effort includes ecological benefits for the Southeastern Everglades, Florida Bay, and Biscayne Bay as authorized by Congress under CERP.

Thank you for your consideration.

Sincerely,

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