

October 1, 2020

Marie Huber, Project Manager
Biscayne Bay and Southeastern Everglades Ecosystem Restoration
Ecosystem Branch Programs and Project Management Division
U.S. Army Corps of Engineers
marie.l.huber@usace.army.mil

Re: BBSEER Scoping Comments

Dear Ms. Huber:

On behalf of Audubon Florida, Everglades Law Center, National Parks Conservation Association, Tropical Audubon Society, and our millions of members and supporters, we write to provide comments on the Biscayne Bay and Southeastern Everglades Ecosystem Restoration (BBSEER) Project Management Plan (PMP). The newly minted BBSEER project 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 two projects, given the great benefits they will provide to Biscayne National Park, Everglades National Park, Florida Bay, the Florida Keys National Marine Sanctuary, and surrounding ecosystems.

We want to acknowledge with appreciation the Corps' efforts to include climate change considerations within early stages of BBSEER planning. Climate change impacts such as sea level rise, increased salinity, more intense and frequent storms, and changing temperature variability will have significant impacts on the Greater Everglades ecosystem and must be considered in long-term project planning. At the same time, we know that Everglades restoration is among the best mitigation and adaptation strategies to safeguard our water resources, native wildlife, and South Florida's built communities against detrimental climate change impacts.

BBSEER must deliver on the ecological benefits of each individual project's purpose.

BBCW Phase II and C-111 SCE are unique projects that were conceptualized with clearly stated ecosystem benefits that must be achieved in order to restore the overall health of the Greater Everglades. BBCW is critical to restoring freshwater flow to Biscayne Bay and Biscayne National Park, and C-111 SCE will help restore the Model Lands and Southern Glades and enhance sheet flow to Florida Bay. Specific project goals of BBCW Phase II as outlined in the [Project Management Plan](#) released in July 2019 include: reestablish productive nursery habitat along the shoreline; redistribute freshwater flow to minimize point-source discharges to improve freshwater and estuarine habitat; restore and improve quantity, quality, timing, and distribution of freshwater flow into the bay, including Biscayne National Park; preserve and restore spatial extent of natural coastal glades habitat; reestablish connectivity between Biscayne coastal wetlands, C-111 Basin, Model Lands, and adjacent basins; and restore nearshore and saltwater wetland salinity regimes. Specific project goals of C-111 SCE as outlined in the [CERP](#) include restoration of natural features in Everglades National Park; and improved quality, quantity, timing, and distribution of freshwater into Florida Bay.

BBSEER must deliver on the ecological benefits of each individual project as authorized by Congress under CERP. It is essential that the end-result of this planning process not include incomplete or watered-down benefits from various project components. The end-result of this planning process should be to deliver the strongest ecological outcome for each Yellow Book component that is now included in BBSEER. We understand that achieving the full scope of benefits for these projects will require significant time and investment and we encourage the Corps to plan for this network of projects that together will deliver on the widespread goals outlined in CERP.

Alternatives must not trade-off between the health of Everglades and Biscayne National Parks.

Biscayne Bay, Florida Bay, and the Southeastern Everglades are all important parts of the Greater Everglades ecosystem. CERP sets out a path for restoration for each region; individual CERP projects should work synergistically, realising widespread benefits that extend beyond the study area of BBSEER. The success of this and other CERP efforts depends on the availability and distribution of clean water, particularly during Florida's dry season. As BBSEER alternatives are developed, it is critical that the Corps and other PDT members avoid providing options that pit two national parks against one another (EVER & BISC) in a competition for water. The goal of this effort must be to elevate and restore the entire region, not focus on localized benefits that may improve one Bay at the expense of the other.

Backfill of the lower C-111 canal is critical for Florida Bay and Biscayne Bay health.

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 concentration in 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. This project will have significant, direct benefits for both Florida Bay and Biscayne Bay. Backfill of the lower C-111 will also allow for operational changes that our groups have been requesting for decades: to raise water levels at the S-18C and to end harmful discharges at the S-197. We have long advocated for these operational changes, most recently throughout planning of the Combined Operational Plan (COP). By finally removing the lower portion of the C-111, these long-awaited ecological improvements can finally be achieved in BBSEER.

The South Florida Ecosystem Restoration Task Force should host BBSEER workshops.

Combining multiple CERP projects is a complicated endeavor that engages a wide range of stakeholders with interests in the Southeastern Everglades, Biscayne Bay, Florida Bay, and surrounding waters and communities. The level of public engagement allowed within a typical PDT meeting is minimal, and not sufficient to gain the important insight of stakeholders that will yield success for this project. Our organizations urge the Corps to work with the South Florida Ecosystem Restoration Task Force to facilitate a series of more inclusive workshops that allow for back-and-forth dialogue, question and answer sessions, and collaborative small group planning exercises. These workshops should include presentations by lead agencies explaining how this particular suite of CERP projects was chosen and grouped together for BBSEER, as this remains unclear to our organizations. We would also request the presentations provide a broader vision as to how this project will interface with the upcoming Southern Everglades project referenced in the PMP. We have successfully participated in such workshops previously, most notably during Central Everglades Planning Project (CEPP) planning, and believe that a similar series of workshops (even if virtual) could be beneficial for BBSEER planning.

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 possibility that combining multiple CERP projects may result in scaled-down benefits; 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. Please ensure that all representatives of our organizations as listed below are included on the project distribution list moving forward.

Thank you for your consideration.

Sincerely,

Beth Alvi
Director of Policy
Audubon Florida

Ansley Samson
General Counsel
Everglades Law Center

Cara Capp
Senior Everglades Program Manager
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