



Everglades Coalition

October 20, 2017

Melissa Nasuti
U.S. Army Corps of Engineers
Jacksonville District
P.O. Box 4970
Jacksonville, FL 32232-0019
Melissa.a.nasuti@usace.army.mil

Re: Scoping Comments for the Combined Operational Plan for constructed features of Modified Water Deliveries to Everglades National Park, C-111 Spreader Canal, and C-111 South Dade

Dear Ms. Nasuti:

On behalf of its 61 member organizations committed to the protection and restoration of America's Everglades, the Everglades Coalition submits these comments on the scoping assessment for the Combined Operational Plan (COP), to define operations for the constructed features of the Modified Water Deliveries (MWD) to Everglades National Park (ENP), C-111 Spreader Canal, and C-111 South Dade Projects.

We understand that the COP will result in a comprehensive, integrated water control plan for the operation of water management infrastructure associated with the MWD and C-111 projects. The Everglades Coalition and its member organizations have long advocated for the planning, funding, and construction of these critical projects to advance ecological restoration of the Southern Everglades and Florida Bay. MWD is a project initiated and funded by the National Park Service with the primary intention to benefit ENP, with ancillary goals for South Dade agriculture. The C-111 Spreader Canal and South Dade Projects seek to further correct the damage inflicted to Florida Bay and ENP by the C&SF Flood Control Project by reestablishing the hydrologic flow between Taylor Slough and Shark River Slough. Just like MDW, these projects keep the water in the natural areas and away from South Dade.

We appreciate the work by state and federal agencies that has resulted in the restoration infrastructure that is on the ground today and look forward to remaining engaged stakeholders through the COP planning process.

1000 Friends of Florida
Arthur R. Marshall Foundation
Audubon Florida
Audubon of Southwest Florida
Audubon of the Western Everglades
Audubon Society of the Everglades
Backcountry Fly Fishers of Naples
Caloosahatchee River Citizens Association/
Riverwatch
Center for Biological Diversity
Clean Water Action
Conservancy of Southwest Florida
Defenders of Wildlife
"Ding" Darling Wildlife Society
Earthjustice
Environment Florida
Everglades Foundation
Everglades Law Center
Everglades Trust
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
Last Stand
League of Women Voters of Florida
Loxahatchee River Coalition
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
Reef Relief
Sanibel-Captiva Conservation Foundation
Save It Now, Glades!
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
Snook and Gamefish Foundation
South Florida Audubon Society
Southern Alliance for Clean Energy
The Florida Wildlife Federation
The Institute for Regional Conservation
The National Wildlife Federation
The Urban Environment League of
Greater Miami

Committed to full protection and restoration of America's Everglades

Finalizing the COP will be the realization of decades of work and millions of dollars in taxpayer investment by the American people to benefit Everglades National Park and Florida Bay. As such, maximizing ecological benefits to the Southern Everglades must be the primary focus of the COP. Specifically, the final plan should:

1. Eliminate the use of the S-197, as identified in the project documents.
2. Increase the canal stages of the C-111 at S-18C, as stated in the project documents.
3. Achieve restoration of water levels in ENP and Florida Bay, as stated in project documents.
4. Set the stage for more water deliveries to ENP and Florida Bay in anticipation of the Central Everglades Plan (CEP), as planned in CERP.
5. Work to reduce harmful discharges to Barnes Sound and Manatee Bay.

With a completed network of restoration and flood control infrastructure in place, the COP can outline a plan to move away from damaging emergency operations that continue to harm the Greater Everglades ecosystem. Instead, we can rely on the restoration infrastructure that has long been planned to move water in a way that is both beneficial to the natural system and protective of stakeholders in Miami-Dade County.

We look forward to remaining engaged through the COP planning process and appreciate the opportunity to provide comments on the scope of this effort. Thank you for your consideration.

Sincerely,



Mark Perry
Co-Chair



Michael J. Baldwin
Co-Chair

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