

SOUTH FLORIDA ECOSYSTEM RESTORATION TASK FORCE

May 18, 2006

Honorable John Paul Woodley
Assistant Secretary of the Army
U.S Department of the Army
Office of Assistant Secretary Civil Works
108 Army Pentagon
Washington, DC 20310-0108

Dear Mr. Secretary:

On behalf of the South Florida Ecosystem Restoration Task Force (Task Force) I am writing to convey the recommendations of the Combined Structural and Operating Plan Advisory Team (Team) concerning the Tentatively Selected Plan (TSP). The Team has conducted 23 meetings since December 2003 for the purpose of providing the Task Force with consensus recommendations concerning the Combined Structural and Operating Plan and developed performance expectations to help define broad strategic goals in critical areas.

The Team carefully considered the TSP developed by the U.S. Army Corps of Engineers. While substantial progress has been made, the Team believes that the TSP did not achieve the performance expectations in a few areas. The Team developed the attached consensus recommendations that it believes will help to improve the performance of the TSP in key areas. Where improvements are beyond the limits of the Combined Structural Operating Plan, the Task Force asks the U.S. Army Corps of Engineers to consider the performance expectations in the formulation and design of future projects.

The Task Force appreciates the opportunity to work with the U.S. Army Corps of Engineers to bring this important effort to a successful conclusion. Thank you for your consideration.

Sincerely,



Kameron Onley
Chair, South Florida Ecosystem Restoration
Task Force

Attachment

TO: South Florida Ecosystem Restoration Task Force
FROM: Loly Espino, Chair, CSOP Advisory Team
DATE: May 1, 2006

On behalf of the CSOP Advisory Team I am pleased to forward to you our consensus recommendations on the CSOP Tentatively Selected Plan.

The CSOP Team first met in December, 2003. Over the past 2 ½ years the Team has met 23 times working in coordination with the Corps for the purpose of providing the Task Force with consensus recommendations concerning the CSOP. Initially the team was chaired by Carol Rist. My appointment as chair commenced in March, 2005. The Team has periodically reported to the Task Force with its expectations and recommendations.

The Team acknowledges the Corps' cooperation and its efforts to address the competing and sometimes conflicting interests presented by the diverse group of stakeholders appointed by the Task Force. Some of these competing interests remain unresolved at this point. In October, 2005, the Team forwarded to you its recommendations on key issues regarding Alternative 5 that it believed remained unresolved. In January, 2006, the Team met to review the Alt5R modeling results. On April 25-26, 2006, the Team and its Technical Panel met to review the Tentatively Selected Plan and develop its consensus recommendations to the Task Force for its consideration.

A theme that runs throughout our recommendations is strong consensus support for the adaptive management approach the Corps has taken with the TSP to deal with the uncertainties associated with modeling such a complex and large system. However, we have underscored that this will require a sustained commitment to the necessary ongoing monitoring, assessment and responses for those charged with implementing the plan.

The Team experienced some frustration and disappointment as it sought to meet its expectations for success for CSOP in the face of project constraints. As we point out in several places, subsequent CERP and other related projects will need to be developed in ways that take into account the CSOP. These projects should actively seek to enhance the successful operations of the CSOP and help to achieve some of the Team's consensus expectations for this critical part of the Everglades system over time.

CSOP ADVISORY TEAM

TENTATIVELY SELECTED PLAN CONSENSUS RECOMMENDATIONS

Adopted Unanimously April 26, 2006

DRAFT RECOMMENDATIONS ON KEY REMAINING ISSUES ON THE CSOP TENTATIVELY SELECTED PLAN

The CSOP Technical Panel and Advisory Team met on April 25-26, 2006 to review the Tentatively Selected Plan in relation to the consensus statements were developed and agreed to by the CSOP Team on October 14, 2005 and accepted by the Task Force at its December, 2005 Meeting.

Issue 1: High water levels in WCA 3A and 3B

October 14, 2005 Consensus Statements on Alt 5

The Corps in developing its Tentatively Selected Plan should:

- ✦ Consider change in operation schedule of 3A to reduce high water levels in 3A without over drying 3A.
- ✦ Continue to maintain Alt 5 distribution and timing of flows to North East Shark River Slough.
- ✦ Not cause additional impacts to 3B beyond those in Alt 5
- ✦ Try to meet balance of flows between 3A and 3B
- ✦ Consider changing rainfall targets during high water periods below the regulatory action levels
- ✦ Consider deferring the closure of flash board risers in L67 by 60 days.
- ✦ Consider increasing S333 capacity.

April 26, 2006 Advisory Team Consensus Statements

The following recommendations were unanimously supported by the members of the Technical Panel reviewed, refined and adopted by the CSOP Advisory Team:

- A. The TSP addressed our consensus recommendations and is headed in the right direction in addressing high water levels in 3A and not cause additional impacts in 3B.

- B. The team supports adaptive management as part of the TSP that provides for improved performance of the CSOP and meets the Teams consensus expectations for success.
- C. Detailed systematic monitoring and assessment, addressing all the stakeholders' interests, needs to be performed so that there are assurances that the adaptive management approach can be implemented
- D. The Corps should review the potential impacts on the performance of the CSOP of other projects such as the EAA Reservoir.

Issue 2: Alt 5 and a 950 cfs pump

October 14, 2005 Consensus Statements on Alt 5

In order to make G211 a divide and to handle both existing and additional seepage due to CSOP implementation, consider providing the additional capacity of 950 cfs (in Alt5) by leaving a 500 cfs pump at 356 and placing additional pumps south of the Trail. This will seek to:

- ↓ Improve hydrologic performance in the Park;
- ↓ Maintain the canal levels at Alt 7r5 levels during the wettest 10% of the time;

In addition, evaluate existing data and monitor water quality during operation to avoid any adverse water quality discharges to the Park. Design the project so that discharges of urban runoff from areas east of L31N to the Park will be prohibited.

April 26, 2006

- *The Technical Panel and Advisory Team were unable to reach consensus on recommendations regarding the adequacy of how the Tentatively Selected Plan addressed its recommendations on the 950 cfs pump.*

Issue 3: Ecological benefits to Florida Bay

October 14, 2005 Consensus Statements on Alt 5

To enhance ecological benefits for Florida Bay, the Corps should consider backfilling the canals associated with the aerjet property and the L31 W canal (south of s175 to its terminus) under appropriate authorities without delaying implementation of the CSOP.

Following the preliminary TSP selection, the Corps should model the following to determine whether the following can provide positive impacts for Florida Bay:

- ✚ Using the eastern portion of Frog Pond for storage
- ✚ C-111 N Spreader canal

April 26, 2006 Advisory Team Consensus Statements

- A. The Corps has addressed the Teams recommendations regarding the backfilling of the L31W canal. Using plugs to block the confluence of the four canals on the Aerojet property may provide further benefits and should be analyzed further. In addition, plugs in the middle of the northern north-south reach and the middle of the eastern east-west reach may also provide benefits. The plug between the L-31W and the western east-west reach needs to be repaired and augmented.
- B. The C111 spreader canal project will address additional modeling concerns currently outside scope of the CSOP.
- C. The TSP provides a large improvement for Florida Bay in the dry season.
- D. The wet season flows in the TSP remain a concern with too much water flowing to the Panhandle and too little to the Slough. This must be addressed by other processes beyond the CSOP (e.g. the C-111 spreader canal project).
- E. Through the CSOP modeling process further reduction in flows through S-18C could only be achieved by causing additional flooding. The potential of providing additional benefits and meeting the CSOP Advisory Team's consensus expectations for Florida Bay is beyond what the CSOP/TSP provides. It should be addressed by the CERP C-111 spreader canal project by looking at further reducing seepage losses from Taylor Slough into the C111 canal

Issue 4: Operations for the C111 buffer system (for both wet season and dry season operations).

October 14, 2005 Consensus Statements on Alt 5

Corps should maximize the use of the Buffer by refining the buffer system operations in Alt 5 to:

- ↓ Increase the depth of reservoirs to help Taylor Slough and Rocky Glades to decrease S176 flows and peak stages
- ↓ Develop criteria to adjust operations based on actual wet or dry period conditions
- ↓ Consider adjustments that lower canal levels based on above ground surface water levels in the Rocky Glades to better utilize the buffer.

In addition, the Corps should evaluate existing data and monitor water quality during operation to ensure that discharges from the detention areas meet water quality standards.

April 26, 2006 Advisory Team Consensus Statements

- A. The TSP increased use of the buffer but it is desirable to further reduce the flows through S-176.
- B. There is a continuing importance to evaluate data and monitor water quality during the buffer system operation to avoid adverse effects.

Issue 5: CSOP sequencing

October 14, 2005 Consensus Statements on Alt 5

The Corps should consider developing a transitional operational plan that can take advantage of the CSOP components as they are constructed to achieve benefits where possible without adversely affecting any of the stakeholders.

April 26, 2006 Advisory Team Consensus Statements

- A. The CSOP team recognizes that significantly more water cannot be put into WCA 3B and Northeast Shark River Slough without the completion of the Tamiami Trail improvements. This project must be prioritized in order to achieve any significant restoration benefits.
- B. Detailed systematic monitoring and assessment, addressing all the stakeholders' interests, needs to be performed so that there are assurances that the adaptive management approach can be implemented.

Issue 6: Flood protection in the 8.5 Square Mile Area and east of 8.5 SMA in Alt 5

October 14, 2005 Consensus Statements on Alt 5

- ↓ The Corps should refine Alt 5 to operate the reach of L31N between G211 and S331, to avoid flooding impacts east of that section of canal.
- ↓ S357 should be operated, in conjunction with operations of S331, to provide flood protection for the 8.5 Square Mile Area consistent with the benefits to the natural system provided by Alt 6D.

April 26, 2006 Advisory Team Consensus Statements

- A. The Corps must meet Congressionally authorized flood protection for the 8.5 SMA and areas east while maintaining Congressionally authorized environmental benefits for ENP