



Everglades Coalition

1000 Friends of Florida
Arthur R. Marshall Foundation
Audubon Florida
Audubon Society of the Everglades
Audubon of Southwest Florida
Caloosahatchee River Citizens
Association / Riverwatch
Center for Biological Diversity
Clean Water Action
Collier County Audubon Society
Conservancy of Southwest Florida
Defenders of Wildlife
Ding Darling Wildlife Society
Earthjustice
Environment Florida
Everglades Coordinating Council
Everglades Foundation
Everglades Law Center
Florida Conservation Alliance
Florida Defenders of the
Environment
Florida Keys Environmental Fund
Florida Native Plant Society
Florida Oceanographic Society
Florida Wildlife Federation
Friends of the Arthur R. Marshall
Loxahatchee National Wildlife
Refuge
Friends of the Everglades
Hendry Glades Audubon Society
Institute for Regional
Conservation
Izaak Walton League Florida
Division
Izaak Walton League Florida Keys
Chapter
Izaak Walton League Mangrove
Chapter
Izaak Walton League of America
Last Stand
League of Women Voters of Florida
Loxahatchee River Coalition
Martin County Conservation
Alliance
National Audubon Society
National Parks Conservation
Association
National Wildlife Federation
National Wildlife Refuge
Association
Natural Resources Defense
Council
Reef Relief
Sanibel-Captiva Conservation
Foundation
Save It Now, Glades!
Sierra Club
Sierra Club Broward Group
Sierra Club Calusa Group
Sierra Club Central Florida Group
Sierra Club Florida Chapter
Sierra Club Loxahatchee Group
Sierra Club Miami Group
Snook and Gamefish Foundation
South Florida Audubon Society
Tropical Audubon Society
The Urban Environment League
of Greater Miami

July 28, 2014

Angelique Bochnak, Ph.D.
AMEC
Environment & Infrastructure
404 SW 140th Terrace, Newberry, FL 32669-3000

Dear Dr. Bochnak:

The Everglades Coalition of 54 organizations, which are committed to protecting and restoring America's Everglades, submits the following comments on the Draft Environmental Assessment (EA) for the Fisheating Creek Wetland Reserve Program:

The 34,000 acre Fisheating Creek Wetland Reserve project lies in Highlands County, upstream of its course in Glades County. It will be the largest contiguous wetland reserve project in the history of the United States. More than \$100 million of taxpayer's money has been invested in the acquisition of easements for this project, so it is crucially important that the benefits of this public investment are fully realized. We believe they will be when proposed wetland restoration programs are implemented in this severely over-drained area. The programs adopted by the Natural Resources Conservation Service will set a national benchmark for watershed enhancement through hydrologic restoration of wetlands that re-establish the connectivity of the Fisheating Creek site's varied habitats.

The Fisheating Creek basin in Highlands County is important habitat for a variety of iconic wildlife species, including Audubon's Crested Caracara, Bald Eagles, and Sandhill Cranes. This project is located at the crossroads of habitats favored by the Florida Panther and the Florida Black Bear and when implemented promises to become the central link between the Everglades National Headwaters Refuge and the Florida Panther National Wildlife Refuge, allowing bears and panthers to comfortably expand their range.

Agricultural drainage ditches have had adverse effects on the hydrologic regime of Fisheating Creek and hence Lake Okeechobee and need to be removed. Restoring thousands of acres of agriculturally drained wetlands in Fisheating Creek basin in Highlands County will recreate the habitat

and hydrology that has been lost. The hydrological restoration benefits will contribute toward system-wide goals for Okeechobee, the Northern Estuaries, and the Everglades.

To ensure the nation's investment in this program is fully realized, it is essential that the Draft EA includes alternatives that set robust goals for wetland restoration and habitat improvement. We urge updating the Draft EA to add alternatives to reflect the following suggestions:

1. Maximize the acreage of restored wetlands on the property

The Draft EA recognizes that "Over 50 percent of the nation's wetlands in the lower 48 states have been lost since colonial times...Although much progress has been made in recent years, valuable wetlands in the US continue to disappear." The EA explicitly states that the Fisheating Creek project is "intended to help restore and protect these valuable wetlands." Draft EA, pg.1-1.

However, the alternatives in the Draft EA fall short in their quantity and quality of wetland restoration. Historically, there were an estimated 23,623 acres of wetlands throughout the property. The alternatives propose to restore only up to 13,218 acres, leaving more than 10,000 acres still overly drained. Many of the acres that are not restored in the current EA alternatives are short hydroperiod wetlands- crucial areas for wading bird foraging. We urge the NRCS to develop an alternative that includes as much restoration as possible of these short hydroperiod wetlands on these 10,000 acres. The EA should be amended to assess how much it would cost and how many more acres of wetlands could be restored.

2. Invest more dollars per acre for improvements ensuring greater wetland restoration

The federal government has already invested more than \$100 million in the acquisition of the Fisheating Creek WRP. NRCS has a responsibility to make sure this initial investment is protected by restorative improvements to the land that will ensure benefits are actually realized. The Environmental Assessment sets out restoration alternatives costing approximately \$130 per acre. To implement full restoration on these properties, however, it is likely that \$400 to \$500 per acre will be needed to backfill and/or remediate many more miles of ditches than is proposed in the Draft EA. Moreover, control of invasive vegetation will require consistent long-term management to maintain the integrity of all of these restored habitats. The EA should include realistic calculations of these annual costs and identify specific funding sources.

3. Revisit restoration plans for the 4,600 acre Grassy Slough.

This large marsh has the most water-storage capacity on the property. It is essential to restore Grassy Slough to the fullest extent possible. Yet the EA and Wetland Reserve Plan of Operation reports that the only modeled options would leave the central

drainage ditch in place; only two different weir elevations were looked at before recommending the same elevation as the current weir be maintained. Before selecting the existing condition as NRCS's "final alternative," the EA should further explore other options and determine, in fact, whether they could improve water flow and increase storage while requiring less costly maintenance. Those options include various backfilling configurations, notched weirs at different elevations, and/or operable structures. All should be fully evaluated before a final alternative is selected.

NRCS must seize this unprecedented and widely supported opportunity to restore a sizable portion of these Northern Everglades wetlands.

Sincerely,



Cara Capp
National Co-Chair



Jason Totoiu
State Co-Chair