



# Everglades Coalition

1000 Friends of Florida  
Arthur R. Marshall Foundation  
Audubon of Florida  
Audubon Society of the Everglades  
Broward County Audubon Society  
Caloosahatche River Citizens  
Association  
Clean Water Action  
Clean Water Network  
Collier County Audubon Society  
Conservancy of Southwest Florida  
Defenders of Wildlife  
Ding Darling Wildlife Society  
Earthjustice  
Environment Florida  
The Environmental Coalition  
Everglades Coordinating Council  
Everglades Foundation  
Everglades Law Center  
Florida Defenders of the  
Environment  
Florida Keys Environmental Fund  
The Florida Native Plant Society  
Florida Oceanographic Society  
Florida Sierra Club  
Florida Wildlife Federation  
Friends of Arthur R. Marshall  
Loxahatchee Wildlife Refuge  
Friends of the Everglades  
Izaak Walton League  
Florida Keys Chapter  
Florida Division  
Izaak Walton League of America  
Mangrove Chapter  
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  
Natural Resources  
Defense Council  
The Ocean Conservancy  
The Pegasus Foundation  
Sanibel-Captiva  
Conservation Foundation  
Save It Now, Glades!  
Sierra Club  
Sierra Club Broward Group  
Sierra Club Central Florida Group  
Sierra Club Loxahatchee Group  
Sierra Club Miami Group  
Tropical Audubon Society  
The Urban Environment League  
World Wildlife Fund

December 10, 2008

Col. Paul Grosskruger  
U.S. Army Corp of Engineers  
701 San Marco Boulevard  
Jacksonville, FL 32207-8175

Dear Colonel Grosskruger,

On behalf of the Everglades Coalition, and the more than 6 million members it represents among 51 organizations, we write to express our deep concern about the Corps' *Proposed Interim Operating Criteria for the 8.5 Square Mile Area Project* ("Operating Criteria"). Based on the proposed Operating Criteria, the Corps has given local flood mitigation operational priority over the intended project purpose: restoring more natural water conditions to Everglades National Park. Therefore, we urge you to reconsider this Operating Criteria, and instead adopt operations that are consistent with the General Reevaluation Report of 2000.

The proposed operations for the pump station S-331 will assure that pumping will be at least as much as it is currently, and will likely increase with restoration. Current pumping volumes at S-331 have been tied to major ecological damage, especially in lower C-111 canal. As a result, the entire C-111 Project was designed based upon the assumption that S-331 pumping would be reduced. These proposed operations threaten to overwhelm the C-111 Project features, jeopardize the entire C-111 Project and perpetuate the decades long decline in Florida Bay. In short, this proposal seems to overlook the operational lessons of the past two decades: massive pumping at S-331 causes environmental damages downstream; it also undermines ongoing efforts to remedy the damages this pumping has already caused. These proposed operations reverse the stated Corps policy to use new features solely to mitigate for the effects of the Modified Water Deliveries Project – which have not yet been realized. Yet the operations are proposed without an assessment of the impacts, as the analysis contained in the document is not the same as the proposed operations.

In addition, the Operating Criteria now also proposes to operate the new S-357 pump in a nearly identical manner to S-331, resulting in much higher than anticipated pumping and using Everglades National Park as a dumping ground for 8.5 Square Mile Area flood water. If this Operating Criteria is adopted in its current form, it will subvert the key objectives of the Modified Water Deliveries project and the C-111 Project. In addition to our environmental concerns, we are also alarmed that this approach will induce even more inappropriate development into this area due to the misplaced commitment for more flood mitigation.

This document, combined with statements by your staff at the November 19th public meeting that these pumps can and should be used to *improve* flood protection, suggests that the Corps will build projects ostensibly for environmental restoration, but divert their use to increase flood control after construction. We rely on the Corps leadership to make sure that every aspect of these projects conforms to the project purposes and objectives, and look to you to correct this grievous proposal.

Sincerely,

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State Co-Chair  
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