



Everglades Coalition

1000 Friends of Florida
Arthur R. Marshall Foundation
Audubon of Florida
Audubon Society of the Everglades
Audubon of Southwest Florida
Caloosahatchee River Citizens
Association/ Riverwatch
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 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 Wildlife Refuge
Friends of the Everglades
Hendry Glades Audubon Society
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
The Ocean Conservancy
The Pegasus Foundation
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
The Snook and Gamefish Foundation
South Florida Audubon Society
Tropical Audubon Society
The Urban Environment League
World Wildlife Fund

June 24, 2013

Gulf Coast Ecosystem Restoration Council,
c/o U.S. Department of Commerce
1401 Constitution Avenue, N.W., Room 4077
Washington, DC 20230

Dear Gulf Coast Ecosystem Restoration Council:

The Everglades Coalition, an alliance of 57 local, regional, state, and national conservation organizations, is dedicated to full restoration of the Greater Everglades Ecosystem, from the Kissimmee Chain of Lakes south of Orlando to Lake Okeechobee and to the estuaries, through the River of Grass, out to Biscayne and Florida Bays, and ultimately to the Atlantic Ocean and Gulf of Mexico. We are providing comments on the *Draft Initial Comprehensive Plan: Restoring the Gulf Coast's Ecosystem and Economy* (the *Draft Plan*).

The 2010 Deepwater Horizon oil spill brought tremendous environmental and economic damage to the natural ecosystems and communities scattered across America's Gulf Coast. We believe that the RESTORE Act provides an unprecedented opportunity to ensure that responsible parties are held accountable for the disaster and that financial penalties are returned to the region. The recently released *Draft Plan* reaffirms the legislative intent of the RESTORE Act, which calls for an ecosystem-based, landscape-scale approach for restoring the long-term health of the Gulf Coast region. The Goals, Objectives, and Evaluation Criteria discussed in Sections III and IV, if implemented as described, can lead to the recovery and restoration of the Gulf Coast region. However, to understand how these concepts will be implemented, a critical next step for the Gulf Coast Ecosystem Restoration Council (the Council) is to release the "Ten-Year Funding Strategy" to show how the funds will be allocated for the next ten years and the "Funded Priorities List" to show what will be funded over the next three years.

The Everglades Coalition supports the Council's commitments, as described in Section II of the *Draft Plan*, for science-based decision making, broad participation from diverse stakeholders, partnership leveraging, and the importance of measuring outcomes and impacts to ensure funds are invested meaningfully. We applaud the recognition that "upland, estuarine, and marine habitats are intrinsically connected," and that "a regional approach to restoration more effectively leverages the resources of the Gulf Coast and promotes holistic Gulf Coast recovery" (p. 6). The Comprehensive Everglades

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Restoration Plan (CERP), the world's largest ecosystem restoration effort and model for other large-scale restoration plans, includes guiding principles that are comparable to the commitments from the Council and have proven to be effective as CERP continues to be executed. We strongly encourage the Council to ensure that these commitments are fulfilled as the final comprehensive plan is developed and implemented.

Section IV of the *Draft Plan* discusses the Council-Selected Restoration Component and identifies seven Objectives that describe the types of activities that could be funded under the Council's Restoration Component. Each of these objectives are important components of ecosystem restoration and are appropriate for selecting and funding projects that will "restore and protect the natural resources, ecosystems, water quality, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region" (p.11). The Everglades Coalition appreciates the Council's affirmation that the purpose of the Council-Selected Restoration Component is to fund ecosystem restoration projects that contribute to the health and resiliency of the entire Gulf Coast ecosystem.

The RESTORE Act and the *Draft Plan* provide guidelines for evaluating restoration projects and programs that call for the Council to utilize the best available science and prioritize projects based on the four Priority Criteria for at least the first three years. The four Priority Criteria are as follows:

"(I) Projects that are projected to make the greatest contribution to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region, without regard to geographic location within the Gulf Coast region.

"(II) Large-scale projects and programs that are projected to substantially contribute to restoring and protecting the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast ecosystem.

"(III) Projects contained in existing Gulf Coast State comprehensive plans for the restoration and protection of natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands of the Gulf Coast region.

"(IV) Projects that restore long-term resiliency of the natural resources, ecosystems, fisheries, marine and wildlife habitats, beaches, and coastal wetlands most impacted by the Deepwater Horizon oil spill."¹

Based on the legislative intent of the RESTORE Act and the Goals, Objectives, and Priority Criteria described in the *Draft Plan*, the Everglades Coalition urges the Council to prioritize two Everglades restoration projects that will provide numerous environmental and economic benefits to critically important habitats and estuaries that are primary drivers of Gulf fisheries, wetlands on national significance, and habitats critical for resident and migratory birds and other wildlife. These two projects are the bridging of Tamiami Trail and the construction of the Caloosahatchee River (C-43) West Basin Storage Reservoir. Both of these projects meet the Goals, Objectives, and Priority Criteria, as defined in the *Draft Plan*. The natural resources, ecosystems, fisheries, marine and wildlife habitats, and coastal wetlands of the southwest coast of Florida and Florida Bay suffer from the management of existing water infrastructure that delivers too much or too little freshwater to these economically important Gulf of Mexico estuaries. These two large-scale projects are included in comprehensive restoration plans approved by Congress and are critical components that are necessary to fulfill the federal-state partnership to restore America's Everglades. They will contribute to restoring and protecting natural resources of the Gulf Coast and bring long-term resiliency to the natural resources impacted by the Deepwater Horizon oil spill and other environmental catastrophes, as outlined in the RESTORE Act criteria above and discussed in the *Draft Plan*.

Tamiami Trail Bridging

Tamiami Trail is a road that connects Tampa to Miami and forms a portion of the northern boundary of Everglades National Park. Since its construction in the 1920s, Tamiami Trail has acted as a dam, impeding the historic and natural north-south flow of water through Everglades National Park, south to Florida Bay and

¹ Moving Ahead for Progress in the 21st Century Act, H.R. 4348, § 1603 (t)(2)(D)(iii), 126 Stat. 405, at 599-600, 112th Congress (2012).

southwest to the Ten Thousand Islands on the Gulf Coast. As a result, this part of the Everglades is starved of vital water, causing deterioration of important bird and wildlife habitat and its unique ridge and slough landscape.

The lack of freshwater flowing from the Everglades into Florida Bay and the Ten Thousand Islands is one of the primary reasons for the decline of many fisheries and in turn, wading birds. Reconnecting this natural pattern and hydrating this region of the Gulf Coast will prevent further salt water intrusion and restore wildlife habitat and water quality in this mangrove labyrinth benefiting marine wildlife, fisheries, and nesting colonies of numerous bird species. Additionally, bridging Tamiami Trail will increase our capacity to move more water from Lake Okeechobee through the central Everglades, thus reducing the devastating water flows that are currently being forced into the Caloosahatchee and St. Lucie rivers and estuary. These unnatural water flows are killing the coastal estuaries, fueling red tides and other adverse environmental consequences, and wasting billions of gallons of freshwater.

Current construction on a one-mile bridge is almost complete, which is a critical first step to allow water to flow unimpeded into the central Everglades. However, it does not go far enough to achieve the results necessary to restore America's Everglades or to halt damaging water flow to the Gulf. Building an additional 5.5 miles of bridge spans is key to restoring the "River of Grass" and its historic water flow through Everglades National Park to the Ten Thousand Islands region and Florida Bay, where the interface of the marine waters of the Gulf of Mexico and the freshwater of the Everglades ranks among the most ecologically productive areas of the region.

The projected cost for the 5.5 miles of bridging is \$320 million, and the project is being phased so the full amount is not needed at once. The National Park Service (NPS) is currently designing the next 2.6-mile bridge, estimated to cost approximately \$100 to \$150 million. According to the final Environmental Impact Statement, Tamiami Trail bridging will create more than 3,700 jobs. Many of these jobs are in the hard-hit construction sector. These direct economic benefits are in addition to those from constructing the one-mile bridge, for which an \$81 million contract was awarded to Kiewit Construction that created more than 1,200 jobs from 2010 to 2012. Additional bridging was authorized by Congress in 2012 and is currently being planned and designed by NPS at their Denver Service Center.

Caloosahatchee River (C-43) West Basin Storage Reservoir

The Comprehensive Everglades Restoration Plan calls for the construction of the C-43 Reservoir on 11,000 acres of former farmland in Hendry County, Florida. This project will capture and store stormwater runoff and water releases from Lake Okeechobee so that salinity balances and other estuary needs can be properly met during wet and dry seasons. The C-43 Reservoir will improve the health of the Caloosahatchee estuary on the Gulf of Mexico to benefit commercial and recreational fisheries, oyster and bird habitat, and the many livelihoods that depend on the healthy coasts.

Currently, when Lake Okeechobee rises to a level that threatens the integrity of the Herbert Hoover Dike, large pulses of polluted water are discharged to coastal estuaries of national significance on both the Gulf and Atlantic coasts. The high-nutrient loads of the released water have triggered algal blooms, washed out seagrass beds, and disrupted the salinity balance required to maintain healthy estuaries and protect sensitive wildlife habitat. In times of drought and during the annual "dry season," the Caloosahatchee estuary needs additional freshwater to maintain salinity levels that make it home to nearly 40 percent of Florida's rare, threatened, and endangered species.

To benefit the Gulf of Mexico and the C-43 basin, which spans Hendry, Glades, Charlotte, Collier, and Lee counties, the proposed C-43 Reservoir will hold freshwater from the lake, enhancing community resilience to seasonal variability by preventing the massive, harmful releases in times of flood while providing a necessary freshwater source in times of drought. This will allow for more natural, seasonal fluctuations in estuarine salinity that are conducive to estuarine fish and shellfish species. The C-43 project has tremendous value for the people who

depend on the ecological health of the unique marine, estuarine, and freshwater wetlands of the Caloosahatchee Gulf Coast estuary for their livelihood.

The projected cost for the C-43 Reservoir is approximately \$580 million. The State of Florida has already invested \$100 million to purchase land; construct and monitor test cells; and finish the project design. According to the South Florida Water Management District, the project can be phased so the full amount is not needed at once. The U.S. Army Corps of Engineers estimates that the C-43 Reservoir will create 7,800 jobs, many of which are construction jobs.

Restoration of the Everglades, Florida Bay, and the Caloosahatchee estuary will help ensure long-term environmental and economic viability to the Gulf Coast. A recent report by Mather Economics found that every \$1 investment in Everglades restoration generates \$4 in return in ecosystem benefits such as drinking water supply, tourism, park visitation, recreation, and wildlife habitat. The Mather study estimates that more than 442,000 jobs will be created by Everglades restoration over the next 50 years. Over the last three years, Everglades restoration projects have generated 10,500 jobs. According to the National Park Service, in 2010 alone, Everglades National Park created more than 2,000 jobs and generated more than \$136 million in visitor spending. Utilizing RESTORE Act funds on these two projects will improve the health and vitality of the Gulf of Mexico and protect the ecosystem, economy, and drinking water supply for 7.5 million Americans.

The Everglades Coalition appreciates the opportunity to comment on the *Draft Plan* and looks forward to working with the Council over the coming months as it develops the final comprehensive plan that includes the "Ten-Year Funding Strategy" and the "Funded Priorities List." Based on the Goals, Objectives, and Priority Criteria outlined in the *Draft Plan*, we urge the Council to include these two Everglades projects in the "Funded Priorities List" because they are shovel-ready projects that will bring tangible environmental and economic benefits to the Gulf region and fulfill the goals and objectives contained in the *Draft Plan*. Please feel free to contact us if you have any questions or thoughts about the best ways to fund these two vital restoration projects.

Sincerely,



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