

June 11, 2001

Colonel James G. May  
District Engineer  
U.S. Army Corps of Engineers  
P.O. Box 4970  
Jacksonville, Florida 32232-0019

Mr. Frank Finch  
Executive Director  
South Florida Water Management District  
P.O. Box 24680  
West Palm Beach, Florida 33416-4680

Re: Comprehensive Everglades Protection Plan:  
“Decomartmentalization” of Water  
Conservation Area 3

Dear Colonel May and Mr. Finch:

The purpose of this letter is to provide you an early alert to an issue that the Florida Fish and Wildlife Conservation Commission strongly believes will require detailed investigations by your staffs and ours during the development of the Comprehensive Everglades Restoration Plan. This plan aims to restore hydrological conditions in the Everglades to a state that more resembles that which supported it before it was diked and channelized into the system of Water Conservation Areas that we see today. Key components of this plan are water-quality treatment, the reestablishment of appropriate seasonal variation in water depth, and the reestablishment of sheetflow as water moves from the northern part of today’s Everglades, through the Water Conservation Areas and Everglades National Park, and ultimately to Florida Bay. We supported this approach when we reviewed the Integrated Feasibility Report and Environmental Impact Statement for the Review Study (“Restudy”) of the Central and South Florida Project, and we continue to do so.

Colonel James G. May and Mr. Frank Finch  
June 11, 2001  
Page 2

An issue that we brought up during our review, and which needs to be highlighted at this time, is the need to demonstrate the extent to which the removal of recreationally popular canals is necessary in order to meet the project goals. Our position during the Restudy was, and continues to be, that we could not support filling canals that provide high-quality recreational opportunities unless it was necessary to do so in order to accomplish hydrological restoration. Continuing to provide quality nature-based recreational opportunities is a major objective of the Florida Fish and Wildlife Conservation Commission, and the potential for loss of current recreational resources is therefore not one that we take lightly. The economic value of some of these south Florida canals can be considerable. Our Division of Freshwater Fisheries staff estimated that the L-67A canal, which supports some of the best catch rates in the state for largemouth bass, generated an estimated \$1,076,639 in benefits to the economy, most of which is spent locally, during the state fiscal year 2000-2001 (figure represents amount spent during the six-month period when fishing is at its peak in terms of public participation, and it is derived using the U.S. Fish and Wildlife Service's National Survey of Fishing, Hunting, and Wildlife-Associated Recreation approach). The future of this and other recreationally popular canals (i.e., the L-67C canal, the L-29 canal, and the Miami Canal) is therefore of considerable interest to us.

The CERP project that will have the greatest potential to remove recreationally popular canals is the one termed "Decomartmentalization." This project proposes to fill the Miami Canal and remove barriers to sheetflow. These barriers are identified as portions of the L-67A levee, L-67C levee, and the L-29 levee. The first part of this project has already been initiated, and our staff is actively participating on the Project Delivery Team. For the most part, we have noted that removal of these levees is discussed as if it were synonymous with filling in the associated canals. Since we strongly believe that this assumption is premature, we request that plans to manage this project explicitly include an analysis of the extent to which these canals must be filled to achieve hydrological targets, and that references to degrading the levees refrain from adding canal backfilling as a means until it has been shown to be necessary.

We appreciate your attention to this issue, which is important to the mission of our agency. If your staffs have any questions, please have them contact Mr. Jon Fury (phone: 561-625-5122; e-mail: [furyj@gfc.state.fl.us](mailto:furyj@gfc.state.fl.us)) in the Division of Freshwater Fisheries, South Region office in West Palm Beach.

Sincerely,

Allan L. Egbert, Ph.D.  
Executive Director

Colonel James G. May and Mr. Frank Finch  
June 11, 2001  
Page 3

ALE/MAP

ENV 2-16/2/1

a:\decompcanals.wpd

cc: Ms. Doris Marlin, COE, Jacksonville  
Mr. Fred Sklar, SFWMD, West Palm Beach  
Mr. Jon Fury, FWC, West Palm Beach