



# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
South Florida Ecological Services Office  
1339 20<sup>th</sup> Street  
Vero Beach, Florida 32960

May 6, 2004

Colonel Robert M. Carpenter  
District Engineer  
U.S. Army Corps of Engineers  
701 San Marco Boulevard, Room 372  
Jacksonville, Florida 32207-8175

Dear Colonel Carpenter:

We are pleased to provide the enclosed Planning Aid Report (PAR) as part of our contribution to the Initial Comprehensive Everglades Restoration Plan (CERP) Update (ICU). The Fish and Wildlife Service has prepared this PAR with substantial review and input from the Florida Fish and Wildlife Conservation Commission and National Park Service, Everglades National Park, in accordance with the Fish and Wildlife Coordination Act of 1958, as amended (FWCA) (48 Stat. 401; 16 U.S.C. 661 *et seq.*) and the Endangered Species Act of 1973, as amended (ESA) (16 U.S.C. 1531 *et seq.*). The purpose of the ICU is to update the 1999 Central and Southern Florida Project Comprehensive Review Study plan represented by model run D13R (Restudy Plan), and documented in the U.S. Army Corps of Engineers' July 1999 *Final Integrated Feasibility Report and Programmatic Environmental Impact Statement, Central and Southern Florida Project Comprehensive Review Study*. Because the ICU is a technical update of the Restudy Plan and not a decision-making process contemplating changes to the Restudy Plan, we are providing planning assistance updating our March 1, 1999, FWCA Report on the Restudy Plan through PARs rather than through a new FWCA Report.

This PAR is arranged in three sections. The first section covers overall CERP planning and assessment. The second section covers system-wide fish and wildlife resources issues. The final section addresses evaluation of the South Florida Water Management Model modeling conducted as part of the ICU. The report does not address Other Project Elements or Feasibility Studies that are not part of the CERP as authorized by Congress and does not include an analysis of CERP components outside the domain of the South Florida Water Management Model.

We continue to strongly support CERP implementation and are committed to assisting the Corps and the South Florida Water Management District in optimization or reformulation efforts. Our analysis of the ICU model runs indicates several areas of performance shortfalls in the CERP1 and CERP0 model runs that represent our current understanding of the hydrologic effects of CERP implementation, including shortfalls that were not predicted by Restudy Plan modeling. This particular set of model results does not represent a level of CERP performance that we believe is indicative of the CERP project goals, and this shortfall is likely a result of the current status of the modeling effort. Many individuals are working on improvements to the current runs



and predicted performance will likely improve as optimization efforts continue. We are working actively to help with this process to ensure that the final performance will achieve, and hopefully exceed, the Restudy Plan performance. Without corrections to this modeling, we are concerned that the performance of CERP components as predicted by the CERP1 and CERP0 model runs does not meet the standard set by the Restudy Plan modeling and indicates a need for optimization or reformulation of CERP operations and components in order to match or exceed the Restudy Plan performance.

Our analysis also indicates that CERP1 and CERP0 would affect several federally listed threatened and endangered species in a manner or to an extent not contemplated in our March 1, 1999, Programmatic Biological Opinion on the Restudy Plan. As noted in our June 5, 2003, letter, the Corps will need to reinitiate formal ESA section 7 programmatic consultation either: (1) when a decision is made not to modify the CERP plan based on the ICU results; or (2) at the conclusion of a National Environmental Policy Act process modifying the CERP plan.

The CERP continues to provide an unprecedented opportunity for conserving fish and wildlife resources. We pledge our continuing support in providing recommendations and assistance to maximize these CERP benefits. If you have any questions, please contact me at 772-562-3909 or Senior Biologist Heather McSharry at 772-562-3909 extension 247.

Sincerely yours,

A handwritten signature in black ink, appearing to read "James J. Slack". The signature is written in a cursive style with a large, looping initial "J".

James J. Slack  
Field Supervisor  
South Florida Ecological Services Office

Enclosure

cc: w/enclosure

Service, Atlanta, Georgia (Cindy Dohner)

Service, A.R.M. Loxahatchee National Wildlife Refuge, Boynton Beach, Florida (Mark Musaus)

Service, Jacksonville, Florida (Miles Meyer)

DOI, SFERTF, Miami, Florida (Rock Salt)

DOI, Washington D.C. (Don Jodrey)

NPS, ENP, Homestead, Florida (Dan Kimball)

EPA, West Palm Beach, Florida (Richard Harvey)

USGS, Miami, Florida (Ronnie Best)

BIA, Eastern Regional Office, Nashville, Tennessee (Kenneth Bailey)

FWC, Vero Beach, Florida (Joseph Walsh)

FDACS, West Palm Beach, Florida (Linda McCarthy)

DEP, Tallahassee, Florida

District, West Palm Beach, Florida (Henry Dean)

Miccosukee Tribe, Miami, Florida

Seminole Tribe, Hollywood, Florida

Miami-Dade County DERM, Miami, Florida (Gwen Burzycki)

bcc:Reading

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