



United States Department of the Interior

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



September 19, 2005

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 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) (87 Stat. 884; 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' (Corps) 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 addresses evaluation of the South Florida Water Management Model modeling conducted as part of the ICU. The report does not address Other Project Elements of the Restudy Plan 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 CERPA model run that represents 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 would accomplish CERP program goals; however, we believe this shortfall is likely a result of the current status of the modeling effort, including model operational assumptions.



Without corrections to this modeling, we are concerned that the performance of CERP components as predicted by the CERPA model run 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 CERPA 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 Assistant Field Supervisor Barry Rosen at 772-562-3909, extension 299.

Sincerely yours,



James J. Slack
Field Supervisor
South Florida Ecological Services Office

Enclosure

cc: w/enclosure

Service, Atlanta, Georgia (Dave Horning)
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